



Reagen Stoddart
Regulatory Lead Norman Wells
+1 587 962 4484
reagen.a.stoddart@exxonmobil.com

July 20, 2026

Mackenzie Valley Environmental Impact Review Board
Attn: JoAnne Deneron, Chairperson
Box 938, 200 Scotia Centre
5102 – 50 Avenue
Yellowknife, NT X1A 2N7

Submitted via email

Dear Ms. Deneron,

**Re: EA2526-01: Closure and Reclamation – Imperial’s Norman Wells Facilities
Imperial Oil Resources N.W.T. Limited (Imperial) Reply to Information Request from the
Mackenzie Valley Environmental Impact Review Board (MVEIRB) Dated June 17, 2026**

Information Request: Authorizations Required

The Review Board requested that Imperial provide a detailed matrix or table identifying:

1. **Current Authorizations:** All existing land use permits, water licences, leases, and authorizations currently held that permit closure, decommissioning, or reclamation activities.
2. **Pending/Future Authorizations:** All new, amended, or renewed authorizations, licences, permits, approvals, or leases that Imperial anticipates needing from federal, territorial, Indigenous and other regulatory authorities to fully execute the closure plan.
3. **Regulatory Bodies:** The specific oversight body responsible for issuing each identified authorization (e.g., Mackenzie Valley Land and Water Board, Sahtú Land and Water Board, Canada Energy Regulator, Department of Fisheries and Oceans, Government of the Northwest Territories).
4. **Scope and Timeline:** A brief description of the scope of work covered by each authorization and the anticipated timelines for submission and approval.

Imperial Reply

Table 1 shows the current leases held by Imperial and Table 2 summarizes the information requested regarding current and anticipated future regulatory approvals. Regulatory requirements in the tables assume final Closure and Reclamation activities will occur within and adjacent to the Proven Area, as outlined in the Interim Closure and Reclamation Plan (ICRP) and in draft scoping that has been undertaken by MVEIRB for EA2526-01 Closure and Reclamation – Imperial’s Norman Wells Facilities (Closure EA).

The existing authorizations from the Sahtu Land and Water Board (SLWB) and the Canada Energy Regulator (CER) include conditions related to closure, decommissioning, and reclamation activities. Furthermore, progressive closure, decommissioning, and reclamation activities are anticipated to be required during the period of Interim Care & Maintenance (IC&M) between the end of production and the conclusion of the Closure EA and subsequent permitting of full closure activities. The activities undertaken during the period of IC&M are intended to progressively reduce potential risk to people and the environment while supporting economic activity and capacity in the region until the final closure plan for the site is assessed and permitted.

Table 1: Leases held by Imperial Oil for the Norman Wells Facilities

Project Type	Document Type	Imperial Land File Number	Description	Effective Date
Artificial Island	Lease	SNT00091	Rauka Island (1)	November 15, 1982
Artificial Island	Lease	SNT00092	Rampart Island (2)	November 15, 1982
Artificial Island	Lease	SNT00093	Dechco Island (3)	November 15, 1982
Artificial Island	Lease	SNT00094	Ekwe Island (4)	November 15, 1982
Artificial Island	Lease	SNT00095	Iteh K'ee Island (5)	November 15, 1982
Artificial Island	Lease	SNT00096	Little Bear Island (6)	November 15, 1982
Pipeline	Lease	SNT00137	P/L Gathering Line 1	January 24, 1983
Pipeline/Access Rd	Lease	SNT00308	P/L & A/R Line 2	May 23, 2001
Pipeline/Access Rd	Lease	SNT00165A	P/L & A/R Line 3	January 1, 2015
Dock	Lease	SNT00135	Dock 1	May 1, 1992
Dock 2	Lease	SNT00305	Dock 2	November 1, 2001
Bridge Crossing	Licence	SNT00195	Bosworth Bridge	August 21, 1981

Note: all leases are issued by Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC)

Table 2: Summary of Imperial Norman Wells Permits and Authorizations

Regulator(s)	Status	Permit / Approval	Estimated Time of Renewal, Modification	Description
SLWB	Current	Type A Water Licence S13L1.007	2026	Type A Water Licence for the use of water and deposit of waste. A Type A Water Licence has been in place for the operation of the expanded Norman Wells facilities since the 1980's. The licence conditions describe how water can be withdrawn from and returned to the Mackenzie River, how waste is managed, and environmental protection, monitoring, and reporting requirements. The water licence also contains conditions related to progressive reclamation and development of closure plans. Modifications to specific conditions within the licence are required to reflect the circumstances of the site once production of oil and gas has ended. For example, withdrawal and discharge of water for cooling the Central Processing Facility will end and the associated Surveillance Network Program sampling locations will be inoperable.
SLWB	Future	Type A Water Licence	2028	A renewal of the Type A Water Licence will be required to continue care and maintenance activities at site. The application for this licence will have a project description that will describe the proposed activities necessary at the site prior to completion of the Closure EA. Activities at the site are expected to include progressive remediation/reclamation (well suspensions, well abandonments, removal of some infrastructure, environmental site assessment, environmental monitoring, and remediation of soil and groundwater). The proposed activities are intended to reduce potential risks to the surrounding environment and to complement future closure requirements based on the outcomes of the Closure EA.
SLWB	Future	Type A Water Licence	2034	Water Licence(s) will be required for activities related to final closure and post-closure water and waste management. The activities undertaken during these phases are expected to reflect the outcomes of the final closure and reclamation plan and the results of the Closure EA.

Regulator(s)	Status	Permit / Approval	Estimated Time of Renewal, Modification	Description
CER	Current	Operations Authorization OA-1210-001	2026	An Operations Authorization (OA) is in place to manage the CER's responsibilities for the full life cycle of oil and gas activities in the Proven Area. The CER has oversight of operating licences and authorizations for work, safety of works and activities, financial requirements, certificates, environmental impacts and reclamation. The CER is the regulator with oversight of the hydrocarbon resource and the equipment/infrastructure used for production. The CER's oversight includes closure related activities throughout the development's lifecycle (examples: replacement and decommissioning of equipment, well maintenance, suspension, and abandonment, flowline management, and reservoir management). The CER has an overlapping mandate with the SLWB for environmental protection and reclamation applicable to the current and future phases of the development. The CER is expected to continue it's regulation of environmental site assessments, remediation, and reclamation activities related to the Closure EA while the Closure EA progresses.
CER	Future	Operations Authorization	2028	A variance or replacement of the OA will be required to continue the care and maintenance activities at site. Specific activities include environmental monitoring, progressive reclamation, well suspensions, abandonments, removal of infrastructure, reservoir monitoring. An updated OA is anticipated to have an overlapping mandate with the SLWB for environmental protection and reclamation while the Closure EA process progresses.
CER	Future	Operations Authorization	2034	Closure-phase activities for decommissioning and post-closure are expected to reflect the outcomes of the final closure and reclamation plan and the results of the Closure EA.
SLWB	Future	Land Use Permit	2028	A Land Use Permit (LUP) is anticipated to be required for the use of equipment and activities such as demolition, earthworks, quarry activities, temporary access and laydown areas, during IC&M. The application for the LUP will be submitted at the same time and align with the Water Licence application.

Regulator(s)	Status	Permit / Approval	Estimated Time of Renewal, Modification	Description
SLWB	Future	Land Use Permit	2034	A closure-phase LUP for is expected for equipment, demolition, earthworks, temporary access and laydown areas, etc. that reflect the outcomes of the final closure and reclamation plan and the results of the Closure EA.
CIRNAC	Future	Quarry Permit	2028	To provide soil for backfill of remedial excavations and earthworks for construction requirements.
CIRNAC	Future	Quarry Permit	2034	As above and may need to be amended depending on the closure options selected as part of the Closure EA.
DFO	Current	Scientific Licence	Annually	Sampling fish for the Aquatic Effects Monitoring Program. This licence is anticipated to be needed each year the fish sampling is conducted.
DFO	Current	File SC00170	Ongoing	Annual maintenance of the mainland dock and approaches at landing areas for road repairs is expected to continue to be required during IC&M and closure activities.
DFO	Future	Fisheries Act Authorization	2034	Fisheries Act authorizations for closure-related works affecting fish or fish habitat (e.g., quarrying of sandbars, stream crossings, alteration of banks, shoreline stabilization, removal of infrastructure).
GNWT ECC	Current	Hazardous Waste Generator NTG339	Ongoing	Registration as a hazardous waste generator will continue to be required during IC&M and closure activities to manage hazardous waste that may be produced during well work, decommissioning, progressive reclamation, and day to day maintenance of the site.
GNWT ECC	Current	Hazardous Waste Storage NTR019	Ongoing	Registration to manage a hazardous Waste Storage facility will continue to be required during IC&M and closure activities to manage hazardous waste that may be produced during well work, decommissioning, progressive reclamation, and day to day maintenance of the site.
GNWT ECC	Current	Pesticide Application Permit	Biannually	Vegetation management of weeds and overgrowth in and around the site is expected to be required during IC&M and closure activities.
GNWT ECC	Future	Wildlife Permit	As required	Management of potential nuisance wildlife, if necessary, during IC&M and closure activities.

Regulator(s)	Status	Permit / Approval	Estimated Time of Renewal, Modification	Description
Transport Canada	Current	NPP Approval	Ongoing	Navigation protection program approval for artificial islands navigation aids.
Transport Canada	Future	NPP Approval	2034	Navigation-related authorizations for removal or modification of structures in navigable waters (e.g., docks, barge landings, artificial islands) is expected to be required during IC&M and closure activities.
Transport Canada	Current	Vessel Licence	Ongoing	Marine Small Commercial Vessel Licences are required for the operation of the vessels used for access between the mainland and islands. Operation of commercial vessels is expected to be required for cross-river access during IC&M and closure activities.
Transport Canada	Current	Aviation advisory/ notification	2026	Aviation Navigation related to the existing flare stack and near-term demolition.
Town of Norman Wells	Current	Business Licence	Annual	The site is situated within the municipal boundaries of Norman Wells and maintains the necessary business licence.
GNWT ECE	Future	Archaeological Permits	As required	Archaeological permits (Class 1 / Class 2) for any closure works that affect archaeological sites. These are generally expected to be covered by notifications in the event there is a chance find.

Note: the future permits and approvals listed in this table are based on the regulatory framework that is in place at the time of this submission.

Closing

Please contact the undersigned at reagen.a.stoddart@exxonmobil.com if you have any further questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Reagen Stoddart".

Reagen Stoddart
Regulatory Lead, Norman Wells
Imperial Oil Resources N.W.T Limited