Mackenzie Valley Review Board

How the Closure EA Framework fits within the environmental assessment

Imperial Oil Norman Wells Closure Environmental Assessment | EA2526-01

A broader, SEA-style front end to define what successful closure should support — while Imperial continues the **site-specific closure planning** that it is responsible for.

Draft process overview

Why add a Closure EA Framework?

It gives Part One a broader, future-focused front end without replacing closure planning.

1

Regional planning and context

Broader setting and direction

2

Closure EA Framework

What does that context mean for successful closure?

3

Imperial's Closure Plan

What specifically does Imperial propose to do?

The Framework is a bridge between broader regional context and project-specific closure planning.

Key boundary: this is a scaling exercise, not a regional land-use planning exercise.

Part One: two workstreams moving in parallel

The timing is connected, but Imperial does not have to wait for the Framework to continue its Closure Plan.

Review Board / EA stream

SEA-style front end

Starts with regional and long-term context

Defines a Regional Vision and Desired Future Conditions

Develops Framework Goals, Outcomes, Indicators and Initial Assessment Questions

Looks beyond Imperial's direct control where broader context is needed to understand effects and successful closure

Imperial / closure-planning stream

Project-specific closure planning

Continues technical work and engagement

Develops site-specific closure goals and objectives

Develops and compares closure options

Defines criteria, monitoring, implementation and other details under applicable closure and regulatory guidance

The two streams come together for scoping and the Terms of Reference.

The Review Board's SEA-style front end

Strategic assessment thinking applied within a project-specific EA.

1 — Regional & long-term context
What does the broader setting mean for closure?

2 — Regional Vision
What future should successful closure help support?

3 — Desired Future Conditions
What should that future look like?

4 — Framework Goals
What broad outcomes should closure contribute toward?

5 — Framework Outcomes
What more specific outcomes would support those goals?

6 — Indicators & initial EA questions
What information and questions carry forward?

The purpose is to ask first: What should successful closure contribute toward? — before evaluating individual closure options in detail.

Imperial's closure planning: site-specific and within its control

Mackenzie Valley Review Board

The Framework informs the context; Imperial still develops and justifies the closure proposal.

Imperial's Closure Plan

Under applicable Land and Water Board closure and reclamation guidance and other regulatory requirements:

- closure goals and objectives
- closure options and technical design
- closure criteria
- monitoring and implementation
- mitigation and long-term management within Imperial's authority and capabilities

What the Framework asks of Imperial

Consider the broader closure-EA context as its proposal develops

Explain how the proposed closure responds to the Closure Vision, Desired Future Conditions, Framework Goals and Outcomes

Explain relevant differences, trade-offs, limitations or uncertainties

Do not reproduce the Framework word-for-word

Different roles — connected processes.

What is in Imperial's control — and what may be broader than Imperial?

The EA may need to understand the full context even where Imperial cannot deliver the entire outcome.

Primarily within Imperial's control

- How facilities and disturbed areas are closed or reclaimed
- Closure alternatives and design choices
- Mitigation and monitoring tied to the project
- Project-specific access, maintenance and long-term management measures
- Information and commitments Imperial can reasonably provide or implement

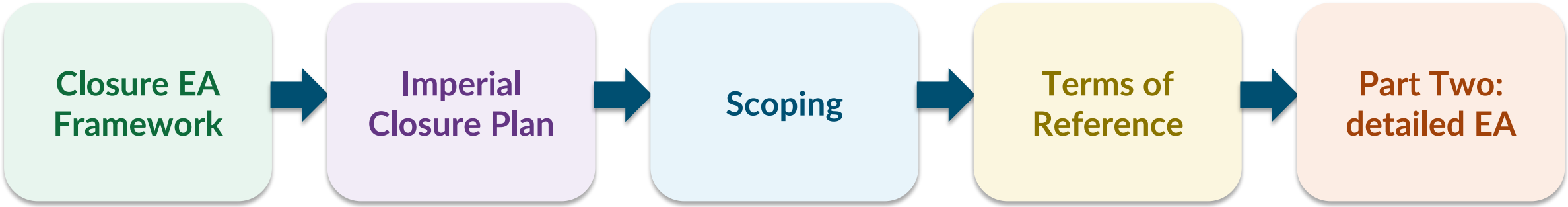
Broader issues the EA may still need to examine

- Future land and water use at local and regional scales
- Indigenous Knowledge, cultural use and community priorities
- Cumulative change and interactions with other activities
- Community well-being and long-term stewardship
- Responsibilities of governments, Indigenous Governments, co-management boards, CER and other regulators

The Framework helps separate what needs to be understood from who has authority or responsibility to address it.

How the Framework and Closure Plan come together in the EA

The Framework does not replace the proposal; it helps the Review Board assess it in context.



+ broader EA record

Closure EA Framework provides context for scoping.
Scoping identifies the closure activities, potential impacts and broader matters that require detailed assessment. The Terms of Reference then identifies the information Imperial must provide for Part Two.

Key messages

1. **The Framework is part of the EA — not a new land-use plan or a replacement for the Closure Plan.**
2. **The Review Board uses a broader, SEA-style front end to connect regional and long-term context to project-specific closure.**
3. Imperial continues the site-specific closure planning it controls, using applicable closure and regulatory guidance.
4. The EA may need to examine broader local and regional issues that are important to successful closure even where Imperial cannot resolve them alone.
5. The Framework, Imperial's Closure Plan and the EA record come together at scoping and the Terms of Reference for Part Two.