



## THE SAHTU SECRETARIAT INCORPORATED

P.O. Box 155,  
Deline, NT X0E 0G0  
Tel: (867) 589-4719, Fax: (867) 589-4908

May 14, 2026

The Honourable Jay Macdonald, M.L.A., Minister of Environment and Climate Change  
Department of Environment and Climate Change  
PO Box 1320  
Yellowknife, NT X1A 2L9

### **Re: Imperial Oil's Norman Wells Operations Final Closure and Reclamation Plan and Proposed Timeline for Environmental Assessment**

Dear Minister Macdonald,

I am writing in my capacity as Chair of the Sahtu Secretariat Inc. (**SSI**), the regional land claim body in the Central Mackenzie Valley, to draw your attention to two major concerns with Imperial Oil Resources N.W.T. Limited's (**Imperial**) closure of its Norman Wells Operations (**NWO**) and associated environmental assessment (**EA**).

#### **Imperial's Final Closure and Reclamation Plan for the NWO is Overdue.**

On March 28, 2025, the Sahtu Land and Water Board issued a renewal of Imperial's Type A Water Licence for the NWO. Water Licence S13L1-007 (the **Licence**) was renewed for a period of three years, effective May 4, 2025, and expiring May 3, 2028, with no changes to the Licence conditions.<sup>1</sup>

The Licence requires a Closure and Reclamation Plan (**CRP**), and conditions applying to the CRP are found in the Licence at Part J: Conditions Applying to Closure and Reclamation. Item 5 of Part J states: "A minimum of 24 months prior to the end of Commercial Operations, the Licensee shall submit a Final Closure and Reclamation Plan to the Board for approval".<sup>2</sup>

However, on January 30, 2026, Imperial informed the Mackenzie Valley Environmental Impact Review Board (**MVRB**) that Imperial will cease production at the NWO in the third quarter of 2026.<sup>3</sup> Imperial's announcement came without an accompanying final CRP. Instead of the final CRP, Imperial continues to rely on an out of date CRP first provided in March 2016 and amended in 2022.

---

<sup>1</sup> Sahtu Land and Water Board, *Imperial Oil Resources N.W.T. Limited – S13L1-007 Board-Initiated Three Year Renewal Type A Licence* (28 March 2025), online: [https://lwb-registry-867.s3.ca-central-1.amazonaws.com/Documents/S13L1-007/S13L1-007%20-%20Board-Initiated%20Three-Year%20Renewal%20-%20Type%20A%20Licence%20-%20Mar28\\_25.pdf](https://lwb-registry-867.s3.ca-central-1.amazonaws.com/Documents/S13L1-007/S13L1-007%20-%20Board-Initiated%20Three-Year%20Renewal%20-%20Type%20A%20Licence%20-%20Mar28_25.pdf)

<sup>2</sup> *Ibid*, Part J at item 5.

<sup>3</sup> Imperial Oil Resources N.W.T. Ltd., *Imperial Oil Resources N.W.T. Limited ("Imperial") Environmental Assessments EA2425-01 and EA2425-02 Notification of Withdrawal of Applications*, (30 January 2026) online (pdf): [https://new.reviewboard.ca/sites/default/files/project\\_document/imperial-letter-to-review-board-cancelation-of-ea\\_0.pdf](https://new.reviewboard.ca/sites/default/files/project_document/imperial-letter-to-review-board-cancelation-of-ea_0.pdf)

Imperial committed to filing a final CRP with the Sahtu Land and Water Board “two years ahead of end of operational field life”.<sup>4</sup> That commitment was made on September 27, 2019, to the Working Group for the Interim Closure and Reclamation Plan for the NWO, well over 6 years ago.<sup>5</sup>

Imperial has failed to act in accordance with the conditions of the Licence and is therefore in breach of section 10(1) of the *Waters Act*, SNWT 2015, c 18.<sup>6</sup>

It is imperative that the Minister to take immediate enforcement action to require Imperial to comply with its Licence conditions, including submitting a final CRP for approval by the Sahtu Land and Water Board. Anything less would send the message that non-compliance with licence conditions issued under a constitutionally protected co-management regime is acceptable.

### **Imperial’s Proposed EA Timeline is Too Long**

Further, Imperial’s failure to provide a final CRP in compliance with the Licence conditions delays the EA. The MVRB indicates Imperial’s interim CRP “does not provide a detailed enough description of the project to allow for the usual initial scoping steps of an EA.”<sup>7</sup>

On March 31, 2025, Imperial self-referred for the EA of the NWO Closure and Reclamation.<sup>8</sup> Imperial’s self-referral indicates a proposed EA schedule as follows:

- EA Start-up Phase – 2025
- EA Scoping Phase – 2025-2028
- EA Analysis Phase – 2028 (Imperial proposes their final CRP is submitted here)
- EA Hearing Phase – 2029
- EA Decision - 2030

This is far too long for this EA.

First, Imperial failed to provide a Final CRP as required by the NWO Licence. Imperial cannot rely on the breach of its own Licence condition to cause further delay to the EA process. Imperial’s proposed schedule has the final CRP submitted in 2028, *four years* after it was due.

Second, the longer the EA timeline, the greater the environmental risks to the Sahtu. Putting off NWO restoration work until 2030 is not acceptable. Climate change, the age and deterioration of NWO infrastructure, and the potential for reduced maintenance and inspection vigilance post-closure, all increase the environmental risks to the Sahtu.

---

<sup>4</sup> Imperial Oil Resources N.W.T. Ltd., *Update RE: Interim Closure and Reclamation Plan, Norman Wells Operations* (27 September 2019), online (pdf): [https://lwb-registry-867.s3.ca-central-1.amazonaws.com/Documents/S13L1-007/S13L1-007%20-%20Norman%20Wells%20ICRP%20update%20to%20Working%20Group%20-%20Seo%2027\\_19.pdf](https://lwb-registry-867.s3.ca-central-1.amazonaws.com/Documents/S13L1-007/S13L1-007%20-%20Norman%20Wells%20ICRP%20update%20to%20Working%20Group%20-%20Seo%2027_19.pdf)

<sup>5</sup> Imperial Oil Resources N.W.T. Limited, *Update RE: Interim Closure and Reclamation Plan, Norman Wells Operations* (27 September 2019), online (pdf): [https://lwb-registry-867.s3.ca-central-1.amazonaws.com/Documents/S13L1-007/S13L1-007%20-%20Norman%20Wells%20ICRP%20update%20to%20Working%20Group%20-%20Seo%2027\\_19.pdf](https://lwb-registry-867.s3.ca-central-1.amazonaws.com/Documents/S13L1-007/S13L1-007%20-%20Norman%20Wells%20ICRP%20update%20to%20Working%20Group%20-%20Seo%2027_19.pdf)

<sup>6</sup> *Waters Act*, SNWT 2015, c 18 at s 10(1).

<sup>7</sup> Mackenzie Valley Environmental Impact Review Board, *EA Process and Next Steps Closure and Reclamation - Imperial Oil’s Norman Wells Facilities (EA2526-01)* (10 February 2026) online (pdf): [new.reviewboard.ca/sites/default/files/project\\_document/imperial-oil-closure-ea-next-steps-feb-10-2026.pdf](http://new.reviewboard.ca/sites/default/files/project_document/imperial-oil-closure-ea-next-steps-feb-10-2026.pdf)

<sup>8</sup> Imperial Oil Resources N.W.T. Limited, *Self-referral for Environmental Assessment of Imperial Oil Resources N.W.T. Limited’s Norman Wells Operation Closure and Reclamation* (31 March 2025), online (pdf): [new.reviewboard.ca/sites/default/files/project\\_document/2025-03-31-imperial-norman-wells-operations-closure-and-reclamation-environmental-assessment-self-referral-1.pdf](http://new.reviewboard.ca/sites/default/files/project_document/2025-03-31-imperial-norman-wells-operations-closure-and-reclamation-environmental-assessment-self-referral-1.pdf)

As long as the NWO remains unrestored, it is Sahtu communities that carry the burden of such risks, including:

- Contamination of the Mackenzie River from ruptured or at-risk underground pipelines,
- Contamination of water and land from aging infrastructure such as oil tanks, pumping stations and pipelines,
- Continued accretion of Imperial's artificial islands and their effect on the Mackenzie River, and
- Ongoing environmental risks posed by inactive machinery and plant.

Third, Imperial's proposed EA timeline frustrates Sahtu rights. The purpose of the MVRB (among other boards) "is to enable residents of the Mackenzie Valley to participate in the management of its resources for the benefit of the residents and of other Canadians".<sup>9</sup> This is foundational to Article 1.1.1 of the *Sahtu Dene and Métis Comprehensive Land Claim Agreement*. Sahtu community members and organizations are ready and willing to exercise their right to participate in this regulatory process, but the lengthy timeline proposed by Imperial for the EA frustrates this right.

Fourth, no comparable projects have endured such a long EA timeframe. Imperial's proposed EA timeline is unprecedented. Only the Giant Mine Remediation EA, at 5 years 2 months, was near the 5-6 year timeline Imperial proposes for the NWO EA. The Ekati Mine Expansion, Snap Lake Diamond Mine, and the Nechalacho Rare Earth Project were all approximately 3 years or less, including scoping. In fact, Imperial supports shorter regulatory timelines when they favour Imperial.

An April 30, 2025 open letter to Prime Minister Carney, signed by Imperial among other industrial proponents, urged the Prime Minister to reduce regulatory timelines on major projects to 6 months or less.<sup>10</sup> Imperial has complained to the MVRB about regulatory timelines in EAs related to the NWO, claiming such EAs "added additional delay for a regulatory decision upon which an investment decision depends".<sup>11</sup>

And fifth, the long EA and delays to NWO restoration increase economic uncertainty in the Sahtu. The closure of Imperial's NWO means less jobs and economic activity in the Sahtu generally, and Norman Wells in particular. Delaying the NWO restoration work pending an unnecessarily long EA increases economic uncertainty in the region. A more reasonable timeline will bring jobs, businesses and services to Norman Wells sooner rather than later and preserve the economic prospects and well-being of Sahtu residents.

### **Restoration is Reconciliation**

Imperial must be held responsible for failing to provide a final CRP in violation of its Licence requirements. After 100 years of exploiting the Sahtu for Imperial's profit, Imperial must not be allowed to continue to delay the pace of the EA nor delay restoration of the NWO site.

People of the Sahtu need to be assured that the lands and waters they have relied on since time immemorial will be restored in a time-sensitive manner. This mitigates environmental risks to land, water, animals and people and ensures the NWO site and surrounding areas, including the Mackenzie River, will continue to provide for Sahtu people.

---

<sup>9</sup> *Mackenzie Valley Resource Management Act*, S.C. 1998, c. 25 at s 9.1.

<sup>10</sup> Build Canada Now: An open letter to the Prime Minister of Canada, April 30, 2025:

<https://www.enbridge.com/stories/2025/april/build-canada-now-prime-minister-mark-carney-strengthen-economic-sovereignty-resilience>

<sup>11</sup> Imperial Oil, *Letter from Jaclyn Mersereau (Environment and Regulatory Technical Lead) to MVRB* (November 13, 2024):

[https://reviewboard.ca/upload/project\\_document/PR46%20ORS%20review%20of%20the%20Scoping%20document%20and%20workplan%20with%20attachments.pdf](https://reviewboard.ca/upload/project_document/PR46%20ORS%20review%20of%20the%20Scoping%20document%20and%20workplan%20with%20attachments.pdf)

SSI remains committed to working with all parties for a timely and effective EA and looks forward to starting the restoration and healing of land and waters impacted by Imperial's NWO.

Restoration of Sahtu land that has been degraded over a century of industrial use, with little long-term benefit accruing to Sahtu residents, represents a collective act of renewal, trust-building, and reconciliation.

Yours very truly,



Charles McNeely  
Chair, SSI

cc SSI Board Members  
Sahtu MLA Daniel McNeely  
MVEIRB  
SLWB  
Mayor Frank Pope, Norman Wells  
Deline Got'ine Government  
Tlegotine Got'ine Government  
Honourable Rebecca Chartrand, Minister of Northern and Arctic Affairs