



THE SAHTU SECRETARIAT INCORPORATED

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May 14, 2026

Mark Cliffe-Phillips
Executive Director
Mackenzie Valley Environmental Impact Review Board
P.O. Box 938, 200 Scotia Centre
Yellowknife, NT, X1A 2N7

Re: Norman Wells Operations Closure and Reclamation EA2526-01.

Dear Mr. Cliffe-Phillips,

I am writing in my capacity as Chair of the Sahtu Secretariat Inc. (**SSI**), the regional land claim body in the Central Mackenzie Valley, with reference to the Mackenzie Valley Review Board's (**MVRB**) document *Environmental Assessment (EA) Process and Next Steps Closure and Reclamation for EA2526-01*, issued on February 10, 2026.¹

SSI welcomes the establishment of an EA process for the closure of Imperial Oil Resources N.W.T. Limited's (**Imperial**) Norman Wells Operations (**NWO**). However, SSI is seriously concerned about proposed timelines for the NWO EA. Imperial has suggested the EA "will take between 5 and 7 years to complete".² As noted in SSI's May 16, 2025, correspondence with the MVRB, SSI opposes such lengthy timelines for the EA.³

On October 17, 2025, SSI provided comments on the EA's Draft Scoping Document via the Online Review System (**ORS**), stating SSI's clear opposition to such long timelines, and more specifically the lengthy scoping timeline proposed by Imperial (3 years). In response, Imperial indicated part of this time will be used to develop Imperial's Closure and Reclamation Plan (**CRP**).⁴ However, SSI notes that Imperial's Type A Water Licence (#S13L1-007) (the **Water Licence**) conditions require Imperial to submit a final CRP 24 months *prior* to ceasing commercial operations.⁵

¹ Mackenzie Valley Review Board, *EA Process and Next Steps Closure and Reclamation – Imperial Oil's Norman Wells Facilities (EA2526-01)* (10 February 2026), online (pdf):

https://new.reviewboard.ca/sites/default/files/project_document/imperial-oil-closure-ea-next-steps-feb-10-2026.pdf

² 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): https://new.reviewboard.ca/sites/default/files/project_document/2025-03-31-imperial-norman-wells-operations-closure-and-reclamation-environmental-assessment-self-referral-1.pdf

³ Mackenzie Valley Review Board, *SSI letter to MVEIRB re: scoping timeline* (16 May 2025), online (pdf): https://new.reviewboard.ca/sites/default/files/project_document/2025-05-16-ssi-to-mveirb-re-scoping-timeline.PDF

⁴ Mackenzie Valley Environmental Impact Review Board, *Review of Draft Scoping Document: Review - Sahtu Secretariat Incorporated at comment 01* (14 October 2025), online: <https://new.onlinereviewssystem.ca/review/B0F4D9FA-A469-F011-8DCA-0022483DCAB3>

⁵ 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->

Imperial is well aware of its obligations to provide the final CRP. In a September, 2019 letter to the Working Group for the Interim Closure and Reclamation Plan for the NWO, Imperial confidently told the Working Group “[t]he final closure and reclamation (C&R) plan will be filed with the [Sahtu Land and Water Board] two years ahead of end of operational field life.”⁶

Imperial has failed to submit the CRP in compliance with their Licence conditions, and now expects to extend the EA process, and ultimately the NWO’s restoration, to remedy their failure. This is simply not reasonable.

SSI again urges the MVRB to ensure the entire EA is completed within reasonable timelines: 3 years as opposed to Imperial’s proposed 5-7 years.

Until the NWO is fully restored, environmental risks remain and those risks are borne by the land and people of the Sahtu. Putting off NWO restoration work until 2030, as proposed by Imperial, is unacceptable. 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.

In addition to the NWO EA timelines, SSI brings further EA-related concerns to the MVRB’s attention.

Economic Benefits for the Sahtu

SSI appreciates the MVRB’s inclusion of local capacities, economic transition, and socio-economic conditions to be considered in the EA scoping.

As indicated by SSI’s ORS comments on the EA’s Draft Scoping Document, SSI remains concerned that the social and economic well-being of Sahtu people has never been at the forefront of Imperial’s NWO.

SSI specifically recommended that scoping include Imperial’s 100-year legacy of depleting Sahtu resources, and asked what legacy projects or benefits Sahtu people may see post-closure. Imperial’s tepid response is that Imperial is “committed to providing opportunities for people of the Sahtu”. This is simply not good enough, and SSI needs to see benefits included in the scoping of this EA. Ultimately, it is a Sahtu resource that has earned Imperial, and the federal government, billions of dollars.

Restoration, not Reclamation

The goal of the EA must be that the land is restored, rather than the lower standard of “reclaimed”. And the land must be restored to the satisfaction of Sahtu rights holders.

Sahtu people have been stewards of Sahtu lands since time immemorial. Restoring the ecological integrity of the land is of utmost importance. This is why the standard of “reclamation” is not sufficient to ensure NWO lands are adequately healed.

For this reason, the term “restoration” must be used throughout the NWO EA. Restoration ensures the land and ecosystems are returned as closely as possible to their natural, pre-disturbance state. Restored land will support the full spectrum of traditional land uses, including harvesting, trapping, fishing and spiritual use. Restoration of land is in alignment with Dene and Métis rights and the United Nations Declaration on the Rights of Indigenous Peoples.⁷

1.amazonaws.com/Documents/S13L1-007/S13L1-007%20-%20Board-Initiated%20Three-Year%20Renewal%20-%20Type%20A%20Licence%20-%20Mar28_25.pdf

⁶ 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

⁷ United Nations, *United Nations Declaration on the Rights of Indigenous Peoples, General Assembly Resolution* (13 September 2007) at arts. 25, 26 online (pdf): https://www.un.org/development/desa/indigenouspeoples/wp-content/uploads/sites/19/2018/11/UNDRIP_E_web.pdf; see also *United Nations Declaration on the Rights of Indigenous Peoples Implementation Act*, SNWT 2023, c 36, <<https://canlii.ca/t/564ch>>.

Restoration provides an opportunity for us to all work collectively to heal Sahtu lands and waters exploited by Imperial and the Crown for over a hundred years. Where exploitation of our land has pushed us apart, restoration of our land will bring us together. Restoration is an opportunity to foster reconciliation.

Imperial's Future Water Licence

Imperial's Water Licence expires May 3, 2028, and Imperial will require a Water Licence extension or a new licence to carry it through the EA and restoration process.

SSI will oppose further water licensing unless EA timelines are realistic, such as a 3-year EA timeline. Realistic timelines are a pre-condition for SSI to support Imperial's future water licence application.

It should be noted that SSI supported Imperial's Water Licence extension to May 3, 2028 in exchange for Imperial self-referring the NWO closure for an EA. Imperial's self-referral gets the EA moving and brings us closer to the day the NWO is restored, and environmental risks are reduced or eliminated.

Conclusion

SSI understands it is the MVRB, and not Imperial, that will define and schedule the EA process. SSI wants to make clear our strong opposition to the lengthy timelines proposed by Imperial for this EA.

Now that Imperial has wrung all value out of Sahtu land and ceases commercial operations, completing the EA and restoring the land is in the best interests of Sahtu people, lands and waters. We must all put the effort in to ensure this happens sooner, rather than later.

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

Ayoni Keh Land Corporation – Deline Gotine Government – Norman Wells Land Corporation – Fort Norman Métis
Community– Tuli't'a Land Corporation – Yamoga Land Corporation – Fort Good Hope Métis Local #54 Land Corporation.
