



THE SAHTU SECRETARIAT INCORPORATED

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May 14, 2026

Paul Dixon, Executive Director
Sahtu Land & Water Board
PO Box 1
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Re: Norman Wells Operation – Security Deposit and EA Timelines

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 raise two concerns with your Board.

Imperial Oil Resources N.W.T. Limited (**Imperial**) will cease commercial operations at its Norman Wells Operations (**NWO**) this fall, with the closure being subject to an environmental assessment (**EA**). SSI writes this letter with two central concerns in mind:

- The adequacy of Imperial's security deposit in respect of the NWO closure, and
- Imperials proposed 5-7 year EA timeline.

Review of Imperial's Security Deposit

Imperial's NWO is subject to the terms and conditions of its Type A Water Licence (#S13L1-007) (the **Water Licence**).¹ The Water Licence, at Schedule 2 Part C, sets out the amount of Imperial's security deposit: a total of \$180,883,606.

The Water Licence includes conditions governing the Closure and Reclamation Plan (**CRP**) for the NWO.² The CRP (at section 10) indicates Imperial's financial security obligations should be based on an approved CRP, as set out in the *Mackenzie Valley Land and Water Board Guidelines for the Closure and Reclamation of Advanced Mineral Exploration and Mine Sites in the Northwest Territories (Guidelines)*.³ Imperial's approved CRP is 10 years old. An addendum to the CRP, in 2022, does not address the security deposit.

The Guidelines clearly state that operations "must be able to support the cost of reclamation and be able to provide adequate security to ensure the operator, rather than the landowner, bears the cost of reclamation".⁴

¹ 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

² *Ibid*, Part J.

³ Mackenzie Valley Land and Water Board, *Guidelines for the Closure and Reclamation of Advanced Mineral Exploration and Mine Sites in the Northwest Territories* (November 2013), online (pdf): <https://mvlwb.com/media/873/download?inline>

⁴ *Ibid*, at 27.

It is concerning that Imperial relies on an *interim* CRP, completed 10 years ago, for the liability estimates which inform Imperial's security deposit. Perhaps more alarming is Imperial's admission that even those liability estimates *pre-date* the interim CRP.⁵ It's simply not clear if Imperial's outdated liability estimates are adequate for the restoration of the NWO site.

Imperial's Water Licence requires a final CRP 24 months prior to ceasing commercial operations.⁶ In fact, in 2019 Imperial made a commitment to the Working Group for the Interim Closure and Reclamation Plan for the NWO that "[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."⁷

Imperial has failed to do this.

If Imperial was held to their Water Licence conditions, Imperial would have provided updated liability estimates with an updated CRP. This would in turn have provided a more accurate assessment of what security deposit amount is required to restore land and water disturbed and damaged by the NWO. No such updates have been provided.

SSI is deeply concerned that Imperial's security deposit (which is not indexed to inflation) is based on 10-year-old assumptions about closure and restoration of the NWO. The *Mackenzie Valley Resource Management Act Regulations* give a board the authority to require security for restoration of the land-use operation, based in part on the probability of environmental damage or the significance of any environmental damage.⁸

Imperial has an obligation to provide a recent and accurate evaluation of both the security required and the potential for environmental damage.

SSI requests the Sahtu Land and Water Board evaluate Imperial's security deposit and determine if it is adequate.

Imperial's Proposed 5-7 Year EA Timeline

Imperial has suggested the NWO EA "will take between 5 and 7 years to complete".⁹ As noted in SSI's May 16, 2025, correspondence with the Mackenzie Valley Review Board, SSI opposes such lengthy timelines for the EA.

¹⁰

Imperial's Water Licence expires May 3, 2028. There is no question Imperial will need to apply for a new licence to complete future restoration activities. Imperial should have the EA complete prior to the expiration of the Water Licence, and a new water licence application must be made for the restoration activities. SSI intends to oppose Imperial's future water licence applications in the event the EA is not complete.

⁵ Imperial Oil Limited, *Norman Wells Operations Interim Closure and Reclamation Plan Submitted for Approval March 2016*, (March 2016) at 220.

⁶ *Supra*, note 2 at Part J Item 5.

⁷ 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

⁸ *Mackenzie Valley Land Use Regulations*, SOR/98-429 at s 32(1)(a) and 32(1)(d).

⁹ 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

¹⁰ 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

Additionally, Imperial's Canada Energy Regulator (**CER**) authorization expires May 3, 2028. SSI will also oppose a new CER authorization on the same grounds.

Conclusion

SSI is committed to providing our time and knowledge to the NWO EA process. Restoration of the NWO represents an opportunity to reconcile past exploitation and degradation of Sahtu land with healing of the land.

To achieve this, Imperial must do its part by complying with the conditions of its Water Licence, ensuring their security deposit is adequate for the formidable task ahead, and participating in the EA process in a timely manner.

100 years of Imperial's NWO are coming to a close, and we must all do our part to heal Sahtu lands and waters.

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.
