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February 27, 2025

File: MV2023L1-0010  
MV2023A0028

Mark Cliffe-Phillips  
Mackenzie Valley Review Board  
200 Scotia Centre  
Box 938, 5102-50th Avenue  
Yellowknife NT X1A 2N7

Sent by email

Dear Mark Cliffe-Phillips,

**Re: Paramount Resources Ltd. – Notice of Preliminary Screening Determination – Applications for Land Use Permit and Water Licence – Pointed Mountain Gas Field Remediation Project – Pointed Mountain (Shih T'ah), NT**

The Mackenzie Valley Land and Water Board (Board) met on February 20, 2025 and considered the Application Packages from Paramount Resources Ltd. for Land Use Permit (Permit) MV2023A0028 and Water Licence (Licence) MV2023L1-0010 for the Pointed Mountain Gas Field Remediation Project (Project) in accordance with the *Mackenzie Valley Resource Management Act* (MVRMA).

The Board conducted a preliminary screening based on the public record for the proceedings. Based on the evidence provided, the Board is satisfied the screening has been completed according to section 125 of the MVRMA and has decided **not to refer** the changes to the Project to environmental assessment. The Board's Preliminary Screening Determination and Reasons for Decision, as required by section 121 of the MVRMA, is attached.

If the Board does not receive notice of referral to environmental assessment, it will continue with the regulatory proceedings.

The Board and staff look forward to continued communications throughout the pause period. Please contact Kathy Racher via [email](#) or at (867) 766-7457 with any questions or concerns regarding this letter.

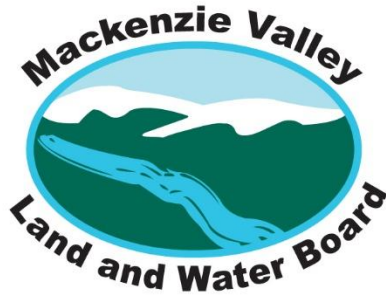
Yours sincerely,

A handwritten signature in blue ink that reads "Tanya MacIntosh". The signature is written in a cursive style with a long horizontal stroke at the beginning.

Tanya MacIntosh  
Chair, Mackenzie Valley Land and Water Board

BCC'd to: Paramount ORS Distribution List  
Terence Hughes, Paramount Resources Ltd.  
Chirag Patney, Shared Values Solutions on behalf of Acho Dene Koe First Nation  
Tamarra Lewis, Shared Values Solutions on behalf of Acho Dene Koe First Nation

Attached: Preliminary Screening Determination and Reasons for Decision



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## Preliminary Screening Determination and Reasons for Decision

Water Licence and Land Use Permit Applications	
File Number	MV2023L1-0010 and MV2023A0028
Company	Paramount Resources Ltd.
Project	Pointed Mountain Gas Field Remediation Project
Location	Pointed Mountain (Shih t'ah), NT
Activity	Industrial Undertaking
Date of Decision	February 20, 2025

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### 1.0 Decision

In accordance with subsection 124(1) of the [Mackenzie Valley Resource Management Act](#) (MVRMA), the Mackenzie Valley Land and Water Board (MVLWB or Board) met on February 20, 2025 to make a preliminary screening determination on the Applications from Paramount Resources Ltd. (Paramount or Applicant) for Land Use Permit MV2023A0028 (Permit)<sup>1</sup> and Water Licence MV2023L1-0010 (Licence)<sup>2</sup> for the Pointed Mountain Gas Field Remediation Project (Project).

The Board has determined that some Project activities are exempt from preliminary screening because they were previously screened. The Applicant has proposed new Project activities and some activities that were previously screened have been changed (collectively proposed changes to the Project). However, and the Board has decided not to refer the proposed changes to the Project to the Mackenzie Valley Environmental Impact Review Board (the Review Board) for Environmental Assessment. This is because, based on the evidence, it is the Board's opinion that the proposed changes to the Project will not have a significant adverse impact on the environment or be a cause of public concern.

The Board's determinations, including reasons for its decisions, are detailed in sections [3.0](#) and [4.0](#).

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<sup>1</sup> See MVLWB Online Registry [www.mvlwb.com](http://www.mvlwb.com) for [MV2023A0028](#) – Application and Related Docs.

<sup>2</sup> See MVLWB Online Registry [MV2023L1-0010](#) – Application and Related Docs.

## 2.0 List of Defined Terms and Acronyms

ADKFN	Acho Dene Koe First Nation
Applicant	Paramount Resources Ltd.
Applications	The Application packages submitted by the Applicant for Water Licence MV2023L1-0010 and Land Use Permit MV2023A0028.
Board	Mackenzie Valley Land and Water Board
CRP	Closure and Reclamation Plan
EA	Environmental Assessment
GNWT	Government of the Northwest Territories
GNWT-ECC	Government of the Northwest Territories – Environment and Climate Change
MVLWB	Mackenzie Valley Land and Water Board
MVRMA	<a href="#">Mackenzie Valley Resource Management Act</a>
Minister	Minister of the Government of the Northwest Territories – Environment and Climate Change
ORS	Online Review System ( <a href="http://www.new.onlinereviewssystem.ca">www.new.onlinereviewssystem.ca</a> )
Party	As per the LWB <a href="#">Rules of Procedure</a> , an applicant, a person, or an organization participating in the regulatory proceeding for the Applications.
Project	Pointed Mountain Gas Field Remediation Project, which is the proposed development (as defined in Part 5 of the MVRMA). <sup>3</sup>
Review Board	Mackenzie Valley Environmental Impact Review Board
SCP	Spill Contingency Plan
Standard Licence Conditions	LWB <a href="#">Standard Water Licence Conditions Template</a>
Standard Permit Conditions	LWB <a href="#">Standard Land Use Permit Conditions Template</a>
TK	Traditional Knowledge
WMP	Waste Management Plan

<sup>3</sup> “development” is defined in Part 5 of the [MVRMA](#) as:

“any undertaking, or any part or extension of an undertaking, that is carried out on land or water and includes an acquisition of lands pursuant to the *Historic Sites and Monuments Act* and measures carried out by a department or agency of government leading to the establishment of a park subject to the *Canada National Parks Act* or the establishment of a park under a territorial law.”

### **3.0 Background and Scope of Screening**

On October 3, 2023, Paramount submitted Applications for a Type A Licence and a Type A Permit (the Applications) for the remediation, reclamation, and closure work at the former Pointed Mountain Gas Field. The Applications were deemed incomplete due to a lack of information around the project description, closure costs, engagement, and proposed approaches specified in management plans. Paramount submitted additional information on February 29, 2024, after which Board staff distributed the Applications for public review.

The Engagement Log and additional supporting documentation provided with the Applications indicate Paramount engaged affected parties regarding the Project in December 2022, April 2023, and May 2023, with additional correspondence with specific parties occurring into fall 2023.<sup>4</sup> While the engagement in 2022 was with respect to previous type B applications which were subsequently withdrawn, they were for the same Project, with the exception of an onsite landfill. The Applications indicate the method of engagement has been via email correspondence.

During the review of Information Requests, ADKFN indicated “there has been a lack of meaningful engagement and adequate consultation with Acho Dene Koe (ADK) First Nation throughout the project history and license application process”<sup>5</sup> and recommended “A clear communication plan is to be written for the activities throughout the lifespan of this license with the ADK First Nation.” The Board understands ADKFN’s concern and looks forward to receiving recommendations from Parties on this matter as the proceeding continues. The Board also notes that ongoing engagement will be required throughout the life of the authorizations.

The Applications include proposed changes to the Project. Under Part 1, Schedule 1, section 2.1 of the Exemption List Regulations to the [MVRMA](#), Project areas and activities that have already been subject to Part 5 of the MVRMA are exempt from preliminary screening. The changes to the Project require screening by the Board in accordance with subsection 124(1) of the MVRMA.

In accordance with paragraph 125(1)(a) of the [MVRMA](#), the Board must conduct a preliminary screening of the proposed changes to the Project to determine and report to the Review Board whether, in its opinion, the proposed changes to the Project might have a significant adverse impact on the environment, or might be a cause of public concern. The details of the Board’s analysis are set out in section [4.0](#) below.

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<sup>4</sup> See [Pointed Mountain - Engagement Log - Oct3 23](#), pgs. 1 and 5, and [Pointed Mountain - Additional Application Information - Feb29 24](#), pg. 17.

<sup>5</sup> See MVLWB Online Review System for [Paramount - Pointed Mountain Gas Field Remediation Project Responses to Information Requests](#), ADKFN comment 3.

### 3.1 Scope of Screening:

#### Previously Screened or Assessed Activities, Areas, and Temporal Boundaries

Three screenings have been previously conducted on the Project prior to the current Applications: the initial screening on June 7, 2007 for Permit MV2007X0007, a second screening on June 5, 2014 for Permit MV2014X0011, and the third on February 3, 2016, for an amendment to Permit MV2014X0011.<sup>6</sup>

Activities, areas, and temporal boundaries that the Board understands to have been previously considered,<sup>7</sup> and which therefore do not require preliminary screening at this time, are identified in Table 1 below.

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<sup>6</sup> See MVLWB Online Registry for [MV2007X0007 - Preliminary screening - Jun7-07](#), [MV2014X0011 - Apache Canada Ltd - Preliminary Screening Report - Jun5-14](#), and [MV2014X0011 - Apache Canada - Amendment - Preliminary Screening Report - Feb3-16](#).

<sup>7</sup> *Ibid.*

**Table 1: Previously Screened or Assessed Areas, Activities, and Temporal Boundaries**

Table 1 presents the areas and activities that have been previously screened.

<b>June 7, 2007, MV2007X0007</b> Description: Pointed mountain gas plant and associated well-sites and infrastructure (four producing wells, 1 injection well, 2 water source wells) Physical boundaries: 60°27"N, 124°00"W; 60°27"N, 123°35"W; 60°10"W, 124°00"W; 60°10"N, 123°35"W Temporal boundaries: June to September 2007 - 2012		
<ul style="list-style-type: none"> <li>• Phase 2 assessments</li> <li>• Ice bridge construction - Liard River</li> <li>• Use of existing roads</li> <li>• Cut and cap wellheads, flow line abandonment, well abandonment</li> <li>• Groundwater monitoring</li> <li>• On site treatment of impacted soil</li> <li>• Off site disposal of material</li> <li>• Remediation and reclamation</li> <li>• On site soil landfilling</li> <li>• Off site soil landfilling</li> <li>• Incineration of soil</li> <li>• Disposal of contaminated surface water and groundwater into injection well</li> </ul>	<ul style="list-style-type: none"> <li>• Recontouring</li> <li>• Vegetation management and monitoring</li> <li>• Fuel storage and use: diesel, gasoline, propane</li> <li>• Use of heavy equipment: earth moving equipment, transport equipment, oil and gas related equipment<sup>8</sup></li> <li>• Excavation</li> <li>• Seeding</li> <li>• Maintenance</li> <li>• Operation</li> <li>• Research</li> <li>• Industrial</li> <li>• Decommissioning</li> <li>• Sewage</li> </ul>	<ul style="list-style-type: none"> <li>• Solid waste</li> <li>• Access road</li> <li>• Abandonment/removal</li> <li>• Automobile, aircraft or vessel movement</li> <li>• Burning</li> <li>• Cut and Fill</li> <li>• Topsoil, overburden or soil: disposal, removal, storage</li> <li>• Waste management</li> <li>• Disposal of hazardous waste</li> <li>• Geoscientific sampling</li> <li>• Site restoration: planting / seeding, recontouring</li> <li>• Soil testing</li> <li>• Stream crossing / bridging</li> </ul>

<sup>8</sup> A detailed list of equipment can be viewed as part of the preliminary screened dated June 7, 2007 MV2023L1-0010 and MV2023A0028 – Paramount Resources Ltd.

**Table 1 Continued.**

<b>June 5, 2014, MV2014X0011</b> Description: Pointed mountain gas plant and associated sites Physical boundaries: 60°11' 19" N, 123°39' 18" W; 60°27'30" N, 123°5'10" W Temporal boundaries: May to October, no year specified		
<ul style="list-style-type: none"> <li>• Downhole disposal</li> <li>• Onsite treatment of contaminated soil</li> <li>• Off site disposal of waste</li> <li>• 49-person camp at airstrip</li> <li>• Sewage - sludge off site to facility, liquid to septic field</li> <li>• Incinerating burnable waste, ash disposed off site</li> <li>• Other domestic waste disposed off site</li> <li>• Use of groundwater wells for potable water</li> <li>• Fuel: 37000 L diesel, 4500 L gasoline</li> <li>• Use of heavy equipment: earth moving equipment, transport equipment, oil and gas related equipment<sup>9</sup></li> <li>• Road crossings</li> </ul>	<ul style="list-style-type: none"> <li>• Vegetation clearing - one hectare</li> <li>• Construction</li> <li>• Maintenance</li> <li>• Operation</li> <li>• Repair</li> <li>• Research</li> <li>• Water Intake</li> <li>• Remediation</li> <li>• Industrial</li> <li>• Linear / corridor</li> <li>• Decommissioning</li> <li>• Abandonment</li> <li>• Sewage</li> <li>• Camp</li> </ul>	<ul style="list-style-type: none"> <li>• Solid waste</li> <li>• Access road: construction, abandonment/removal, modification</li> <li>• Automobile, aircraft or vessel movement</li> <li>• Burning</li> <li>• Cut and fill</li> <li>• Cutting of trees or removal of vegetation</li> <li>• Excavation</li> <li>• Topsoil, overburden or soil: disposal, removal, storage</li> <li>• Waste management: disposal of hazardous waste, waste generation, disposal of sewage</li> <li>• Site restoration: recontouring</li> <li>• Soil testing</li> <li>• Stream crossing / bridging</li> <li>• Air emissions</li> </ul>

<sup>9</sup> A detailed list of equipment can be viewed as part of the preliminary screened dated June 7, 2007 MV2023L1-0010 and MV2023A0028 – Paramount Resources Ltd.

**Table 1 Continued.**

<b>February 3, 2016, MV2014X0011</b> Amendment application: purpose was to work in winter season (Jan to April) and to enable use of additional equipment Description: Pointed mountain gas plant and associated sites Physical boundaries: 60°11' 19" N, 123°39' 18" W; 60°27' 30" N, 123°55' 10" W Temporal boundaries: January to October		
<ul style="list-style-type: none"> <li>• Winter access road</li> <li>• Downhole disposal</li> <li>• On-site treatment of contaminated soil</li> <li>• Off-site disposal of waste</li> <li>• 49-person camp at airstrip</li> <li>• Sewage - sludge off site to facility, liquid to septic field</li> <li>• Incinerating burnable waste, ash disposed off site</li> <li>• Other domestic waste disposed off site</li> <li>• Use of groundwater wells for potable water</li> <li>• Fuel: 37000 L diesel, 4500 L gasoline</li> <li>• Vegetation clearing</li> <li>• Construction</li> </ul>	<ul style="list-style-type: none"> <li>• Maintenance</li> <li>• Operation</li> <li>• Repair</li> <li>• Research</li> <li>• Water Intake</li> <li>• Remediation</li> <li>• Industrial</li> <li>• Linear / corridor</li> <li>• Decommissioning</li> <li>• Abandonment</li> <li>• Solid waste</li> <li>• Access road: construction, abandonment/removal, modification</li> </ul>	<ul style="list-style-type: none"> <li>• Automobile, aircraft or vessel movement</li> <li>• Burning</li> <li>• Cut and Fill</li> <li>• Cutting of trees or removal of vegetation</li> <li>• Excavation</li> <li>• Topsoil, Overburden or Soil: fill, disposal, removal, storage</li> <li>• Waste management: disposal of hazardous waste, waste generation, disposal of sewage</li> <li>• Site restoration: recontouring</li> <li>• Soil testing</li> <li>• Stream crossing / bridging</li> <li>• Air emissions</li> </ul>

**Table 2: Evaluation of Current Applications to Determine Screening Requirements**

Table 2 below identifies all activities, areas, and temporal boundaries included in the current Applications; these have been evaluated against the previous screenings summarized in Table 1. Any aspects of the Project deemed to have been previously screened are listed in the left-hand column. Those Project components that have not yet been screened are deemed to be changes to the Project and are listed in the right-hand column.

Items Previously Screened	Changes to the Project
<p>Activities included in the current Applications that have been screened already:</p> <ul style="list-style-type: none"> <li>• 50-person camp<sup>10</sup></li> <li>• Barge use</li> <li>• Ice bridge over Liard</li> <li>• Use of heavy equipment: earth moving equipment, transportation equipment, oil and gas related equipment, other<sup>11</sup></li> <li>• Incinerating camp waste</li> <li>• Vegetation clearing</li> <li>• Site monitoring</li> <li>• Onsite soil treatment: phytoremediation, soil washing, bioremediation, thermal methods, in-situ treatments, chemical remediation<sup>12</sup></li> <li>• Offsite disposal of waste: debris, camp waste, NORM contaminated soil, etc.</li> <li>• Disposal of wastewater via downhole injection</li> <li>• Landfilling impacted soil</li> <li>• Site assessments: tracer testing, soil sampling, water sampling</li> <li>• Maintain existing roads</li> <li>• Reconstruct existing roads</li> <li>• Water treatment</li> <li>• Water use</li> <li>• Closure and reclamation</li> </ul> <p>Physical boundary of the current Applications:</p> <ul style="list-style-type: none"> <li>• Longitude -123° 55' 10" Latitude 60° 27' 30"</li> <li>• Longitude -123° 39' 18" Latitude 60° 27' 30"</li> <li>• Longitude -123° 55' 10" Latitude 60° 11' 19"</li> <li>• Longitude -123° 39' 18" Latitude 60° 11' 19"</li> </ul>	<p>Activities included in the current Applications that that have not yet been screened:</p> <ul style="list-style-type: none"> <li>• Accessing the site via helicopter</li> <li>• Fuel storage – 130,000 litres of liquid hydrocarbon fuel (diesel and gasoline)</li> <li>• Usage of chemicals for vegetation management</li> <li>• Re-activating disposal well C1</li> <li>• Storage of contaminated soil in a lined containment cell</li> <li>• Permanent landfilling of impacted soil<sup>13</sup></li> <li>• Permanent deposit of wastes: relocation of shallow soils to deeper depths, leaving buried inert waste in place</li> <li>• Drilling for purposes of site assessments</li> <li>• Use of borrow sources and material (response to IR 15 and 16)<sup>14</sup></li> <li>• Use of soil amendments for treatment purposes</li> </ul> <p>Temporal boundary of the current Applications:</p> <ul style="list-style-type: none"> <li>• Seasonality was expanded beyond previous screenings as the Applications indicate activity could occur in any month (response to MVLWB 6).</li> <li>• Permanent waste storage is included: soil landfill in perpetuity, and relocation of waste at shallow depths to deeper depths, buried inert waste.</li> </ul> <p>Cumulative impacts resulting from the Applications:</p> <ul style="list-style-type: none"> <li>• Consideration of the increased and cumulative nature of the impacts associated with these changes to the Project.</li> </ul>

<sup>10</sup> While the previous screenings accounted for 49-person camps, the 50-person camp was considered equivalent for screening purposes.

<sup>11</sup> A complete list is available at [Pointed Mountain - Attachment A - Oct3 23](#), pgs. 14 and 15. While there are differences in specific types of equipment, their impacts were assessed in terms of the activity with usage of the equipment.

<sup>12</sup> These are deemed to have been included in previous screenings for on-site treatment of soil.

<sup>13</sup> The scale of current proposal was not accounted for. Documentation indicates a larger volume than previously screened (Pointed Mountain - EOL Liability Estimate – June18\_24, pgs. 11 and 80).

<sup>14</sup> See MVLWB Registry for [Paramount Pointed Mountain - Paramount response to Borrow Sources Information Request - Feb12 25](#)

MV2023L1-0010 and MV2023A0028 – Paramount Resources Ltd.

### 3.2 Public Record and Regulatory Proceeding

To assist the Board in its preliminary screening determination for the Project, the Board distributed the Applications for public review on May 8, 2024, inviting reviewers to provide comments and recommendations on the Applications and the preliminary screening (e.g., on impacts and mitigation measures) using the Online Review System (ORS). Comments were due June 19, 2024, with responses from the Applicant originally due July 3, 2024; on June 10, 2024 Paramount requested an extension to respond to comments until August 7, 2024, and submitted their responses on that date. The Board received comments and recommendations from Environment and Climate Change Canada, Fisheries and Oceans Canada, and the Government of the Northwest Territories Department of Environment and Climate Change.<sup>15</sup> Board staff also submitted comments and questions for the purposes of clarification.

Since there were no requests to extend the reviewer comment deadlines, the Board is satisfied that a reasonable period of notice was given to affected communities and First Nations, as required by subsection 63(2) of the [MVRMA](#).

Pursuant to Schedule 4.1 of [Northwest Territory Métis Nation \(NWTMN\) Interim Measures Agreement](#),<sup>16</sup> the Board determined that written notice was given to the NWTMN and that a reasonable period of time was allowed for NWTMN to make representations with respect to the Applications.

Pursuant to section 27, paragraphs (a) and (b) of the [Dehcho First Nations \(DCFN\) Interim Measures Agreement](#),<sup>17</sup> the Board has determined that written notice was given to the DCFN, and that a reasonable period of time was allowed for DCFN to make representations with respect to the Applications.

### 4.0 Potential Impacts and Proposed Mitigations

Table 3 below summarizes:

- the potential impacts of the proposed changes to the Project;
- the concerns related to impacts from the Project that were identified during the regulatory proceeding and how the Applicant addressed those concerns;
- the proposed and potential mitigations for the potential impacts; and
- the Board's analysis of the potential impacts and proposed mitigations.

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<sup>15</sup> See MVLWB Online Registry for Paramount - [Pointed Mountain Gas Field Remediation Project - New Water Licence and Land Use Permit Applications - May8 24](#).

<sup>16</sup> See MVLWB Land Claims, IMAs, and Land Use Plans webpage to access the [Northwest Territory Métis Nation Interim Measures Agreement](#).

<sup>17</sup> See MVLWB Land Claims, IMAs, and Land Use Plans webpage to access the [Dehcho First Nations Interim Measures Agreement](#).

**Table 3: Potential Impacts, Proposed and Potential Mitigations for the Proposed Changes to the Project**

Based on the described mitigations, it is the Board’s opinion that the proposed activities will not have a significant adverse impact on the environment and will not be a cause of public concern. The rationale for this decision is as follows:

- The Project is being carried out in areas that have already been disturbed; some areas have known contamination that in its current state could pose a risk to traditional land users, valued components, and environmental receptors;
- The intent of the Project is to improve the condition of land and water that has been adversely affected by historic activities;
- The extent to which the areas are impacted as a result of historic activities is not fully known, but will be better understood as the Project advances;
- The Project proposes to use technology that is well established;
- The likely means of mitigating impacts associated with the Project are generally well understood by the scientific community;
- The significance of the impacts as a result of the changes to the Project are not of a magnitude that cannot be mitigated;
- A licence provides a mechanism for traditional land users to contribute to improving the area impacted by the Project;
- Any uncertainties regarding the Project can be addressed post-issuance through the development of a closure and reclamation plan. This will provide Parties further opportunities to consider how the Project is remediated, closed, and reclaimed, including end land use goals.

Activity	Potential Impact	Proposed and Potential Mitigations <i>Description of measures to reduce potential impacts, including consideration of cumulative impacts and climate change.</i>	Board Determination
Accessing the site via helicopter	<ul style="list-style-type: none"> <li>• Noise pollution</li> <li>• Terrestrial wildlife disturbance</li> </ul>	GNWT-ECC require a Wildlife Mitigation and Monitoring Plan for this Project to proceed. This plan could include mitigations to manage any identified potential impacts.	Based on the described mitigations, it is the Board’s opinion that the proposed activities will not have a significant adverse impact on the environment and/or will not be a cause of public concern.
Fuel storage up to 130,000 litres of liquid hydrocarbon fuel	<ul style="list-style-type: none"> <li>• Soil: reduced soil quality, change in structure, inability to support vegetation, changes in productivity</li> <li>• Reduced groundwater quality</li> <li>• Reduced surface water quality</li> <li>• Direct loss of vegetation</li> <li>• Direct loss of terrestrial habitat</li> <li>• Reduced aesthetic quality of land and</li> </ul>	The Board has standard permit and licence conditions that are typically used to mitigate the identified potential impacts. These standard conditions could include: <ul style="list-style-type: none"> <li>○ SPILL CONTINGENCY PLAN</li> <li>○ FUEL STORAGE SETBACK</li> <li>○ FUEL CACHE SECONDARY CONTAINMENT</li> <li>○ FUEL CONTAINMENT</li> <li>○ SPILL RESPONSE</li> </ul>	Based on the described mitigations, it is the Board’s opinion that the proposed activities will not have a significant adverse impact on the environment and/or will not be a cause of public concern.

Activity	Potential Impact	Proposed and Potential Mitigations <i>Description of measures to reduce potential impacts, including consideration of cumulative impacts and climate change.</i>	Board Determination
	water	<ul style="list-style-type: none"> <li>○ CLEAN UP SPILLS</li> <li>○ REPORT SPILLS</li> </ul>	
Use of chemicals for vegetation managements	<ul style="list-style-type: none"> <li>• Direct loss of vegetation</li> <li>• Reduced plant health</li> <li>• Groundwater: changes to infiltration, reduction in quality</li> </ul>	<p>The Applicant proposed the following mitigations as part of the public review of the Applications (response to GNWT 19):</p> <ul style="list-style-type: none"> <li>○ Commitment to adhere to all terms and conditions required by the GNWT under a permit for pesticide usage as per the <i>Pesticide Act</i> and Pesticide Regulations.</li> </ul> <p>GNWT-ECC could require a permit for pesticide usage to proceed. This plan could include mitigations to manage any identified potential impacts.</p> <p>The Board’s standard condition CLOSURE AND RECLAMATION PLAN can be used to mitigate the identified potential impacts.</p> <p>The Board may consider non-standard conditions that require the submission of applicable authorizations from other regulators prior to work commencing.</p>	Based on the described mitigations, it is the Board’s opinion that the proposed activities will not have a significant adverse impact on the environment and/or will not be a cause of public concern.
Re-activating disposal well C-1	<ul style="list-style-type: none"> <li>• Reduced surface water quality</li> <li>• Reduced groundwater quality</li> <li>• Soil: reduced soil quality, change in structure, inability to support vegetation, changes in productivity</li> <li>• Compaction of vegetation</li> <li>• Noise, light, air pollution</li> </ul>	<p>The Office of the Regulator of Oil and Gas Operations (OROGO) may require an authorization under the <i>Oil and Gas Operations Act (OGOA)</i> for this activity. This authorization could include conditions to manage any identified potential impacts.</p> <p>The Board has standard permit and licence conditions that are typically used to mitigate the identified potential impacts. These standard conditions could include:</p> <ul style="list-style-type: none"> <li>○ WASTE MANGEMENT PLAN</li> <li>○ EFFLUENT QUALITY CRITERIA</li> <li>○ CLOSURE AND RECLAMATION PLAN</li> </ul> <p>The Board may consider non-standard conditions that require</p>	Based on the described mitigations, it is the Board’s opinion that the proposed activities will not have a significant adverse impact on the environment and/or will not be a cause of public concern.

Activity	Potential Impact	Proposed and Potential Mitigations <i>Description of measures to reduce potential impacts, including consideration of cumulative impacts and climate change.</i>	Board Determination
		submission of applicable authorizations from other regulators.	
Permanent landfill with impacted soil	<ul style="list-style-type: none"> <li>• Surface water: changes in flows or levels, drainage patters, and reduced quality</li> <li>• Groundwater: changes in flow, and reduced quality</li> <li>• Vegetation: compaction, reduction in abundance</li> <li>• Noise pollution</li> <li>• Light pollution</li> <li>• Air pollution, including greenhouse gas emissions</li> <li>• Terrestrial wildlife: disturbances to key lifecycle stages of terrestrial wildlife species (breeding, feeding, nesting, staging), effects to population abundance, species diversity, health, migratory movement pathways, terrestrial wildlife predator-prey relationships, human-wildlife conflicts</li> <li>• Aquatic wildlife: breeding disturbances, diversity changes, effects to health, population abundance, species diversity, changes to habitat</li> <li>• Potential fire</li> <li>• Reduced recreational and traditional usage, including traditional harvesting, and subsistence</li> <li>• Human health risk</li> <li>• Reduced aesthetic quality of land and water</li> <li>• Soil: compaction, reduced soil quality,</li> </ul>	<p>The Applicant proposed the following mitigations in the Applications and responses to review comments:</p> <ul style="list-style-type: none"> <li>○ Appropriate design, construction and monitoring should reduce impacts (response to MVLWB 60, 70 application review)</li> <li>○ Recontouring as needed (MVLWB 70, 71)</li> <li>○ Use of a previously disturbed area.</li> <li>○ Paramount will, when appropriate employ a wildlife monitor. (MVLWB 77, 80)</li> <li>○ Paramount has policies related to wildlife harassment, appropriate speed limits, etc. (MVLWB 77, 80)</li> <li>○ Equipment will be turned off when not in use (MVLWB 78)</li> <li>○ Proper maintenance of equipment and waste disposal practices. (MVLWB 82)</li> </ul> <p>The Board has standard permit and licence conditions that are typically used to mitigate the identified potential impacts. These standard conditions could include:</p> <ul style="list-style-type: none"> <li>○ FIRE-FIGHTING EQUIPMENT</li> <li>○ WASTE MANGEMENT PLAN</li> <li>○ ENGINEERED STRUCTURES – GENERAL</li> <li>○ DESIGN AND CONSTRUCTION PLAN</li> <li>○ DESIGN DRAWINGS</li> <li>○ NOTIFICATION CONSTRUCTION – ENGINEERED STRUCTURES</li> <li>○ CONSTRUCT AS DESIGNED – ENGINEERED STRUCTURE(S)</li> <li>○ AS-BUILT REPORT – ENGINEEERED STRUCTURE(S)</li> <li>○ EFFLUENT QUALITY CRITERIA</li> <li>○ SPILL CONTINGENCY PLAN</li> <li>○ CLOSURE AND RECLAMATION PLAN</li> <li>○ POST-CLOSURE MONITORING AND MAINTENANCE PLAN</li> <li>○ PERFORMANCE ASSESSMENT REPORT</li> </ul>	Based on the described mitigations, it is the Board’s opinion that the proposed activities will not have a significant adverse impact on the environment and/or will not be a cause of public concern.

Activity	Potential Impact	Proposed and Potential Mitigations <i>Description of measures to reduce potential impacts, including consideration of cumulative impacts and climate change.</i>	Board Determination
	change in structure, inability to support vegetation, changes in productivity		
Permanent deposit of waste: relocation of impacted soil at shallow depths to deeper depths, leaving buried inert waste in place	<ul style="list-style-type: none"> <li>• Groundwater: changes in flow, and reduced quality</li> <li>• Soil: compaction, reduced soil quality, change in structure, inability to support vegetation, changes in productivity</li> <li>• Vegetation: reduction in abundance</li> </ul>	The Boards standard condition CLOSURE AND RECLAMATION PLAN can be used to mitigate the identified potential impacts.	Based on the described mitigations, it is the Board’s opinion that the proposed activities will not have a significant adverse impact on the environment and/or will not be a cause of public concern.
Drilling for the purpose of site assessments	<ul style="list-style-type: none"> <li>• Noise pollution</li> <li>• Light pollution</li> <li>• Wildlife: sensory disturbance</li> <li>• Soil: compaction, reduced soil quality, change in structure, inability to support vegetation, changes in productivity</li> <li>• Surface water: reduced quality</li> <li>• Groundwater: reduced quality</li> </ul>	The Board has standard permit and licence conditions that are typically used to mitigate the identified potential impacts. These standard conditions could include: <ul style="list-style-type: none"> <li>○ DRILLING SETBACK</li> <li>○ EQUIPMENT: WATERCOURSE BUFFER</li> </ul>	Based on the described mitigations, it is the Board’s opinion that the proposed activities will not have a significant adverse impact on the environment and/or will not be a cause of public concern.
Use of borrow material	<ul style="list-style-type: none"> <li>• Erosion and sedimentation</li> <li>• Soil contamination</li> <li>• Surface water: changes in flows or levels, drainage patters, and reduced quality</li> <li>• Groundwater: changes in flow, and reduced quality</li> <li>• Acid rock drainage</li> <li>• Terrestrial wildlife: disturbances to key lifecycle stages of terrestrial wildlife species (breeding, feeding, nesting,</li> </ul>	The Applicant proposed the following mitigations in response to IR 16 <ul style="list-style-type: none"> <li>○ Borrow material will be used for maintaining the access road. Drip trays, clean equipment and appropriate speed limits will reduce the risk of soil contamination related to vehicle/equipment traffic</li> <li>○ Appropriate sloping will be used</li> <li>○ Soil will be removed</li> <li>○ Water could accumulate in the borrow sources. Paramount will utilize the water for dust control when needed.</li> </ul> The Board has standard permit and licence conditions that are	Based on the described mitigations, it is the Board’s opinion that the proposed activities will not have a significant adverse impact on the environment and/or will not be a cause of public concern.

Activity	Potential Impact	<b>Proposed and Potential Mitigations</b> <i>Description of measures to reduce potential impacts, including consideration of cumulative impacts and climate change.</i>	Board Determination
	staging), effects to population abundance, species diversity, health, migratory movement pathways, terrestrial wildlife predator-prey relationships, human-wildlife conflicts <ul style="list-style-type: none"> <li>• Aquatic wildlife: breeding disturbances, diversity changes, effects to health, population abundance, species diversity, changes to habitat</li> <li>• Impacts to heritage and cultural resources</li> </ul>	typically used to mitigate the identified potential impacts. These standard conditions could include: <ul style="list-style-type: none"> <li>○ QUARRY SETBACK</li> <li>○ CONSTRUCTION MATERIAL – GEOCHEMICAL CRITERIA</li> <li>○ GEOCHEMICAL RECORDS</li> <li>○ GEOCHEMICAL CHARACTERIZATION AND MONITORING PLAN</li> <li>○ WATER MONITORING PLAN</li> <li>○ EROSION CONTROL</li> <li>○ SEDIMENT AND EROSION CONTROL PLAN</li> <li>○ PROGRESSIVE EROSION CONTROL</li> <li>○ REPAIR EROSION</li> <li>○ ARCHAEOLOGICAL BUFFER</li> <li>○ SITE DISTURBANCE</li> <li>○ SITE DISCOVERY AND NOTIFICATION</li> <li>○ ARCHAEOLOGICAL OVERVIEW</li> <li>○ AIA – HIGH POTENTIAL</li> <li>○ AIA</li> </ul> The Board may consider non-standard conditions as well: <ul style="list-style-type: none"> <li>○ BORROW SOURCE MANAGEMENT PLAN</li> </ul>	
Use of soil amendments for treatment landfills	<ul style="list-style-type: none"> <li>• Surface water: changes in flows or levels, drainage patterns, and reduced quality</li> <li>• Groundwater: changes in flow, and reduced quality</li> <li>• Aquatic wildlife: breeding disturbances, diversity changes, effects to health, population abundance, species diversity, changes to habitat</li> </ul>	The Board has standard permit and licence conditions that are typically used to mitigate the identified potential impacts. These standard conditions could include: <ul style="list-style-type: none"> <li>○ WASTE MANAGEMENT PLAN</li> <li>○ CLOSURE AND RECLAMATION PLAN</li> <li>○ HYDROCARBON-CONTAMINATED SOIL TREATMENT FACILITIES</li> <li>○ DESIGN AND CONSTRUCTION PLAN</li> <li>○ WATER MONITORING PLAN</li> </ul>	Based on the described mitigations, it is the Board’s opinion that the proposed activities will not have a significant adverse impact on the environment and/or will not be a cause of public concern.

#### 4.1 Consideration of Potential Impacts

Based on the potential impacts and proposed and potential mitigations identified above in Table 3, the Board considered whether the changes to the Project might have a significant adverse impact on the environment. In general, impacts of the changes to the Project on the environment can be mitigated through the use of standard permit and/or licence conditions and/or project-specific conditions established by the Board as per the LWB [Standard Process for Creating New Conditions](#). These conditions may include requirements for management and monitoring plans that provide detailed information regarding the implementation of mitigation measures and the evaluation of their effectiveness.

The conditions will be discussed in further detail by all Parties through the regulatory proceeding and will be finalized by the Board following completion of the regulatory proceeding.

#### 4.2 Consideration of Public Concern

In addition to considering the potential impacts of the changes to the Project, the Board considered whether the changes to the Project might be a cause of public concern.

Based on the evidence provided during the regulatory proceeding thus far, the Board did not identify any comments or issues that indicate that the Project is a cause of public concern.

#### 5.0 Conclusion

The Board completed preliminary screenings of the Project on June 7, 2007, June 5, 2014, and February 3, 2016;<sup>18</sup> however, the Applications include proposed changes to the Project. Accordingly, the Board has determined that Project activities that have already been subject to Part 5 of the [MVRMA](#) are exempt from preliminary screening under Part 1, Schedule 1, section 2.1 of the Exemption List Regulations to the MVRMA. The Board has conducted a preliminary screening of the proposed changes to the Project.

The Board has reviewed all the evidence received during the regulatory process with respect to the Preliminary Screening of the proposed changes to the Project. Based on the evidence, it is the Board's opinion that the proposed changes to the Project will not have a significant adverse impact on the environment or be a cause of public concern, as set out in paragraph 125(1)(a) of the [MVRMA](#). The Board has therefore decided not to refer the proposed changes to the Project to Environmental Assessment and will resume the regulatory proceeding.

SIGNATURE



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**Tanya MacIntosh, Chair**  
**Mackenzie Valley Land and Water Board**

February 27, 2025

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**Date**

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<sup>18</sup> See MVLWB Online Registry for [MV2007X0007 - Preliminary screening - Jun7-07](#), [MV2014X0011 - Apache Canada Ltd - Preliminary Screening Report - Jun5-14](#), and [MV2014X0011 - Apache Canada - Amendment - Preliminary Screening Report - Feb3-16](#)