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August 19, 2026

File: S13L1-007

Jacki Costley
Environment & Regulatory Advisor
Imperial Oil Limited
505 Quarry Park Blvd S.E.
Calgary, AB T2C 5N1

Sent by [email](#)

Re: Request to modify water withdrawal approach – Modification - Part G

Dear Jacki Costley,

The Sahtú Land and Water Board (SLWB or Board) received the proposed plan to modify the method and locations of withdrawing water from the Mackenzie River for the Norman Wells Operations (NWO) as requested by Imperial Oil Resources N.W.T. Limited (Imperial) on June 22, 2026.^{1,2} The SLWB determines that this proposal is a Modification as per Part G: of Water Licence S13L1-007. As the proposed Modification results in changes to the Surveillance Network Program (SNP) and the Quality Assurance/Quality Control (QA/QC) Plan, both which require Board approval to be updated, the requested Modification was reviewed and approved by the Board. This proposal is subject to the following:

- Imperial shall include a summary of water use activities and volumes in the NWO Annual Report 2026 and subsequent annual reports;
- Imperial shall complete the following steps prior to converting the CPF settling pond into a Category A holding pond as outlined in the July 31, 2026, Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC) Inspector letter to the Board:

¹ See SLWB Online Registry for [S13L1-007 – 2026 Water Withdrawal Approach – Imperial to SLWB – Updated Modification Request – Jun22_26](#).

² See SLWB Online Review System for [Imperial Water Withdrawal Approach Modification Request – Jun25_26](#).

- Sample water currently contained in the CPF settling pond to confirm it meets Category B criteria
 - Clean the CPF settling pond in accordance with current procedures outlined in the QAQC Manual
 - Collect, sample and appropriately dispose of sediment accumulated in the CPF settling pond in accordance with current procedures
 - Sample water from within the CPF settling pond once refilled to confirm Category B status
 - Report the results of the water and sediment sampling to the Sahtú Land and Water Board and the Inspector
- Imperial shall submit an updated QA/QC Plan; and
 - Imperial shall contact the Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC) Inspector Erika Nissen two weeks prior to the change in the water withdrawal approach at 819-920-4703.

Changes to the Surveillance Network Program (SNP)

Imperial is requesting to change the status of the two SNP surface water monitoring stations to inactive. Once these monitoring stations become inactive, sampling under Section C and measured water temperatures under Section H of the SNP will no longer be conducted. Imperial is also requesting to change the CPF Settling Pond from a Category B facility to a Category A facility, reducing the sampling and analysis requirements for the Settling Pond.

The Board determined that the Modification proposes changes to the SNP and not to specific water licence conditions. Changes to the SNP do not warrant a water licence amendment process but require approval from the Board. The Board approves the status change for the two surface water monitoring stations, S13L1-007-1 and S13L1-007-2, to inactive, and the CPF Settling Pond from Category B to Category A, subject to this letter's requirements. Imperial is required to continue to follow the SNP requirements, including measuring, recording and reporting the quantities of fresh water pumped from the Mackenzie River at all withdrawal locations.

Submission Requirements

The Board requires that the QA/QC Plan be revised to include all changes detailed in the Modification and submitted by September 9, 2026. The revised QA/QC Plan will be considered to be approved when the Licensee receives written confirmation of conformity from Board staff. Until the revised QA/QC Plan is approved, the Licensee may not commence the activities associated with the Modification, and must comply with the QA/QC Plan, Version 1.5.

CIRNAC has provided a letter of conditions and support (attached and available on the Public Registry).

Please contact Natalie Lipa via [email](#) or at (867) 322-6868 with any questions or concerns regarding this letter.

Yours sincerely,



Valerie Gordon
Chair, Sahtú Land and Water Board

CC'd to: Abul Kabir - Compliance Program Manager (North) - CER
 Megan Larose – Environmental Specialist – CIRNAC
 Erika Nissen – Resource Management Officer – CIRNAC
 Josh Hutchings - Conventional Oil and Gas Assets Manager – Imperial
 Chris Sieben - Norman Wells Technical Supervisor – Imperial
 Jason Tarcon – Norman Wells Maintenance Supervisor – Imperial

Attached: Water Withdrawal Approach Modification – CIRNAC Communication Approval



Resource and Land Management
PO Box 1500, 4923 52nd Street
Yellowknife, Northwest Territories X1A 2R3

July 31, 2026

Sent Via: e-mail

Natalie Lippa; Regulatory Specialist
Sahtu Land and Water Board
PO Box 1, Fort Good Hope, Northwest Territories X0E 0H0

RE: S13L1-007 - Imperial Oil Resources N.W.T Limited Request to Modify Water Withdrawal Approach

Dear Natalie,

Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC) – Resource and Land Management (RLM) reviewed Imperial Oil Resources N.W.T. Limited's (Imperial's) June 22, 2026 modification request for Water Licence S13L1-007. The request includes the following changes:

- Addition of twelve new water withdrawal locations along the Mackenzie River, Goose Island, Bear Island, and the six artificial islands (including seasonal/ice-based options)
- Discontinue the surveillance network program (SNP) sampling required as per Annex A Part C Condition 1 and 2 of the Water Licence
- Conversion of the central processing facility (CPF) settling pond to a Category A holding pond which will result in ending the SNP sampling required as per Annex A Part C Condition 3, 4, and 6.

Given Imperial's transition toward cessation of production and the reduced water use needs, CIRNAC-RLM generally support carrying out the proposed changes as a modification in accordance with Part G Condition 1 of Water Licence S13L1-007 subject to Imperial carrying out the following activities.

- Water use volume tracking and reporting from each separate withdrawal location will continue in accordance with the SNP identified in Annex A Part H.
- Intakes used to withdraw water at all locations will follow Fisheries and Oceans Canada guidance for end-of-pipe fish screens.
- Prior to converting the CPF settling pond into a Category A holding pond, the following will be completed:
 - Sample water currently contained in the CPF settling pond to confirm it meets Category B criteria
 - Clean the CPF settling pond in accordance with current procedures outlined in the QAQC Manual
 - Collect, sample and appropriately dispose of sediment accumulated in the CPF settling pond in accordance with current procedures
 - Sample water from within the CPF settling pond once refilled to confirm Category B status
 - Report the results of the water and sediment sampling to the Sahtú Land and Water Board and the Inspector.

If you have any questions or need any additional information, please contact Resource Management Officer (Inspector) Erika Nissen (Erika.Nissen@rcaanc-cirnac.gc.ca) or the undersigned.

Regards,

Megan Larose
Environmental Specialist
Resource and Land Management, NWT Region
Crown-Indigenous Relations and Northern Affairs Canada
Email: megan.larose@rcaanc-cirnac.gc.ca

