



ʔehdzo Got'ıne Gots'ę Nákedı

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Larry Wallace, Chair
Sahtú Land and Water Board

Delivered via email

October-9-13

RE: Husky applications S13X-003 and S13L1-006

Dear Mr. Wallace,:

The ʔehdzo Got'ıne Gots'ę Nákedı (Sahtú Renewable Resources Board, the Board) has reviewed Husky Oil Operations' Land Use Permit and Water License Applications based on its mandated responsibilities under the Sahtú Dene and Métis Comprehensive Land Claim Agreement, and has also received some input from local harvesters which has been incorporated into this letter.

The Board has general concerns about the construction and further expansion of all-weather facilities, because year-round operations have significantly greater impacts on wildlife than winter-only operations. For example, drilling and activities that involve a lot of road and/or air traffic could have significant impacts on wildlife during the fall (rutting season for moose and caribou and bird migration), and during the spring (nesting season and calving season). Moreover, all-weather access roads and well pads will create irreversible changes to the wetlands and hydrology of the area.

Harvesters attempting to hunt near the Husky lease this past fall found that the helicopter traffic scared away the animals and interfered with harvesters' experience of being out on the land. **The Board asks Husky to consult with ʔehdzo Got'ıne (Renewable Resource Councils, or RRCs) and local harvesters before the fall hunt, and reroute helicopter traffic over those identified hunting areas. We suggest Husky should follow the Sahtú Land Use Plan recommendation for horizontal setbacks of 2000 metres and minimum altitude of 300 metres for ungulates.**

With regard to the conversion of groundwater monitoring well MW-09 to a water source, the Board would like further assurance that the removal of groundwater will not impact (in the short-term or long-term) groundwater or surface water levels in the area. While the Board appreciates the initial groundwater testing completed by Husky, as outlined in the Groundwater Investigation Report, more information is required as to whether the extraction will impact surface water bodies. **We urge Husky to provide the following information:**

- **a cross-section showing the location of the wells, geometry of the aquifer, and its relationship to nearby water bodies; and**

- **how pumping is expected to affect the water table of the aquifer and any connected water bodies.**

It may be valuable to perform pump tests on MW-09A using the second existing groundwater well (MV-09B) as a monitoring well to determine how drawdown in MV-09A affects groundwater levels a short distance away.

In addition, **groundwater levels should be monitored closely for the duration of Husky's operations to verify whether Husky's predictions about recharge rates and impacts on surface water bodies are correct.**

Thank you for taking the Board's comments into consideration.

Sincerely,

A handwritten signature in black ink, appearing to read 'D. Simmons', with a long horizontal stroke extending to the right.

Deborah Simmons
Executive Director