



## MEMO

**TO:** Kearn Oil Sands Mine

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**COMPANY:** Imperial Oil Resources Limited

**FROM:** [REDACTED] (WSP)

**DATE:** 15 April 2023

**CC:** [REDACTED] (WSP), [REDACTED] (WSP), [REDACTED] (Imperial), [REDACTED] (Imperial)

**PROJECT NO.:** CE0489223B.006

**SUBJECT:** Imperial Kearn Oil Sands Mine Seep Investigation

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## 1 INTRODUCTION

On May 19, 2022, Imperial Oil Resources Limited (Imperial) notified the Alberta Energy Regulator (AER) of seeps to the north and east of the Kearn Oil Sands Mine (KOSM) Lease boundary. The four potentially impacted areas identified during field and desktop investigations include (Figure 1):

- North Overburden Disposal Area (NODA);
- West External Tailing Area (WETA);
- Drainage Pond 4 (DP4); and
- Waterbody 3 (WB3).

Following the discovery of the seeps, Imperial set up a Task Team and launched an investigation to understand the cause of the observations and potential environmental impacts. Additional water sampling, soil sampling, vegetation and wildlife assessments were conducted at the impacted areas as part of the initial investigation. In addition to environmental monitoring, Imperial drew down the water levels in operations ponds and ditches near the perimeter of the site and initiated a geochemistry study to help determine the source of the water.

Imperial developed an Action Plan which was submitted to the AER on June 28, 2022. The Action Plan described the work conducted prior to that point with preliminary results, a preliminary conceptual site model (CSM) and the tasks planned to help refine the CSM and to confirm the source/pathways of potential contamination. A Surface Water Monitoring Plan for 2022 was also included in the June 28 Action Plan. Imperial provided an update to the AER on the investigation on November 29, 2022. A Source Control Action Plan and Preliminary Delineation and Remediation Action Plan for Iron Precipitate (iron solids creating staining) Locations was submitted to the AER on December 22, 2022.

A second release event occurred on January 31, 2023, which involved surface flow of 5,300 m<sup>3</sup> of industrial wastewater from Drainage Pond 4 (DP4) to the north of the lease boundary.

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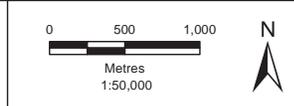
S:\GIS\Projects\CE\0489222\_Imperial\_Kearl\_Monitoring\ArcGIS\Fig 1 Study Area Overview.mxd ANALYST: trevor.robertson 23-04-14 2:25:36 PM



Projection: NAD 1983 UTM Zone 12N  
 QA/QC: KW CF  
 Sources: AB TPR, Centre for Cadastral Management, Geomatics Canada  
 - Contains information licensed under the Open Government licence - Alberta, Canada.  
 Source: Esri, Maxar, Earthstar Geographics, and the GIS User Community

**Imperial**  
**Kearl Oil Sands Mine**

**Study Area**  
**Overview**



April  
 2023

Figure 1

A new Sampling and Monitoring Plan (SMP) was developed in response to the Environmental Protection Order (EPO) issued by the AER to Imperial on February 6, 2023, and updated on March 27, 2023. The SMP has been developed to address the seeps (i.e., iron precipitate observed in the terrestrial and wetland environment) to the north and east of the KOSM and the release from DP4.

## **2 PURPOSE**

This memo provides an update on the surface water quality monitoring conducted for the SMP that includes data collected in the spring of 2023. The data and summary do not include results from samples collected by communities and regulatory agencies. The recent data is used to support a discussion of potential environmental effects from the KOSM seeps and the second release described above.

## **3 SAMPLING PROGRAM OVERVIEW**

### **3.1 NORTH OVERBURDEN DISPOSAL AREA (NODA)**

NODA is an above grade overburden disposal area located west of the external tailings area and north of the North Pit (Figure 1). The initial seep at this location was observed at the toe of the NODA, along the northern edge of the lease boundary. Surface water sample locations for the NODA area are shown on Figure 2 and are described in Appendix A.

### **3.2 WEST EXTERNAL TAILINGS AREA (WETA)**

KOSM utilizes the external tailings areas to store tailings generated through the extraction and processing of bitumen from oil sands. The deposition of Coarse Sand Tailings (CST), Flotation Tailings (FT), and Tailings Solvent Recovery Unit (TSRU) tailings is ongoing in WETA. Surface water with iron precipitate was identified north of WETA. Surface water sample locations for the WETA area are shown on Figure 2 and are described in Appendix A.

### **3.3 DRAINAGE POND 4 (DP4)**

DP4 is a lined industrial wastewater pond along the northern boundary of the KOSM Lease and north of the East External Tailing Area (EETA). DP4 collects runoff from the EETA side slopes, water from the internal external tailings area drains, and groundwater extracted from the external tailings areas Seepage Interception System (SIS). Surface water sample locations for the DP4 area are shown on Figure 2 and are described in Appendix A.

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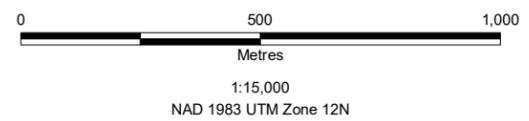
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**Surface Water Investigation Locations**

- DP4
- NODA
- WETA

Notes:  
 - Background Imagery Source: Esri, Maxar, Earthstar Geographics, and the GIS User Community, September 2021



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| <b>IMPERIAL<br/>KEARL OIL SANDS MINE</b>  |              |  |           |
| <b>SURFACE WATER INVESTIGATION LOCATIONS</b>  |              |  |           |
| Date: 06-APR-23   | Drawn by: KR | Edited by: KR                            | App'd by: |
|   |              | Worley Project No.<br>417085-47599-23090 |           |
|   |              | FIG No<br><b>2</b>                       | REV<br>B  |
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### **3.4 WATERBODY 3 (WB3)**

WB3 is a natural waterbody located on the eastern edge of the KOSM Lease, east of the EETA, and releases to a tributary of the Firebag River. The initial seep (WB3-SW-01, formerly WB-3-1) at this location was observed in a low area between WB3 and the EETA perimeter road (Figure 1).

Waterbody 3 has been sampled at three locations (CP-FT-A, CP-FT-A-2 and CP-FT-A-3) between 2012 and 2023. In May 2022 after the seep was observed on the east side of the lease near WB3, samples were collected at additional locations within the waterbody, along the shoreline nearest to the seep and from the seep itself. Surface water sample locations for the WB3 area are shown on Figure 3 and are described in Appendix A.

### **3.5 FIREBAG RIVER (FB)**

The Firebag River is a tributary to the Athabasca River that flows generally to the northeast approximately 3.3 km to the north of the KOSM Lease. The Firebag River has been sampled downstream of the KOSM site from 2013 to 2020. In December 2022, Imperial began monthly water quality sampling in the Firebag River upstream and downstream of potential influence from KOSM. Additional sample locations have been added to assess water quality in tributaries between KOSM and the Firebag River (Figure 4 and Appendix A).

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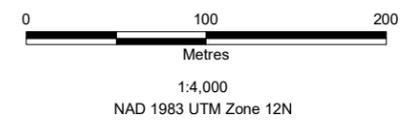
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**Surface Water Investigation Locations**

- Waterbody 3

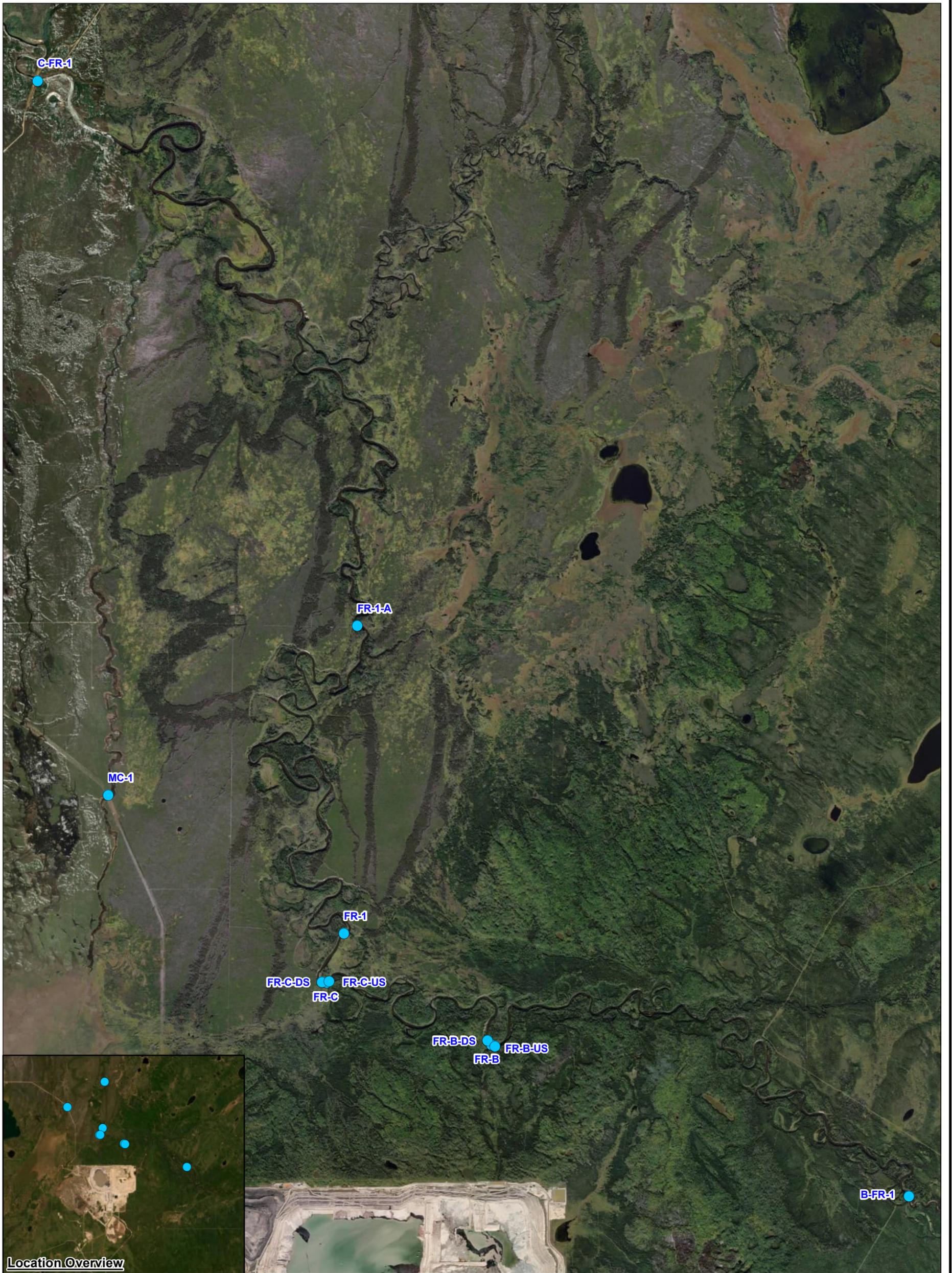
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| <b>SURFACE WATER INVESTIGATION LOCATIONS</b>  |              |  |           |
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|   |              | FIG No<br><b>3</b>                       | REV<br>B  |
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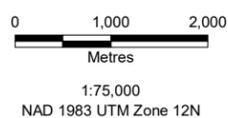
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**Surface Water Investigation Locations**

- Firebag River



**Notes:**

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IMPERIAL  
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**SURFACE WATER INVESTIGATION LOCATIONS**

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FIG No. **4** REV **B**

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## 4 DATA ANALYSIS

Surface water analytical results were compared against Alberta Environment and Parks (AEP) Environmental Quality Guidelines for Alberta Surface Waters (GOA 2018) for the protection of freshwater aquatic life (AEP PAL) and, in the absence of an AEP guideline, compared to the Canadian Council of Ministers of the Environment (CCME) Canadian Environmental Quality Guidelines (CEQGs) (CCME 2023).

## 5 RESULTS

Key Indicator Parameters (KIPs) for seep source sampling locations are detailed in the SMP. These chemical substances are evaluated in the sections below. Full analytical test results of surface water samples are in Appendix B.

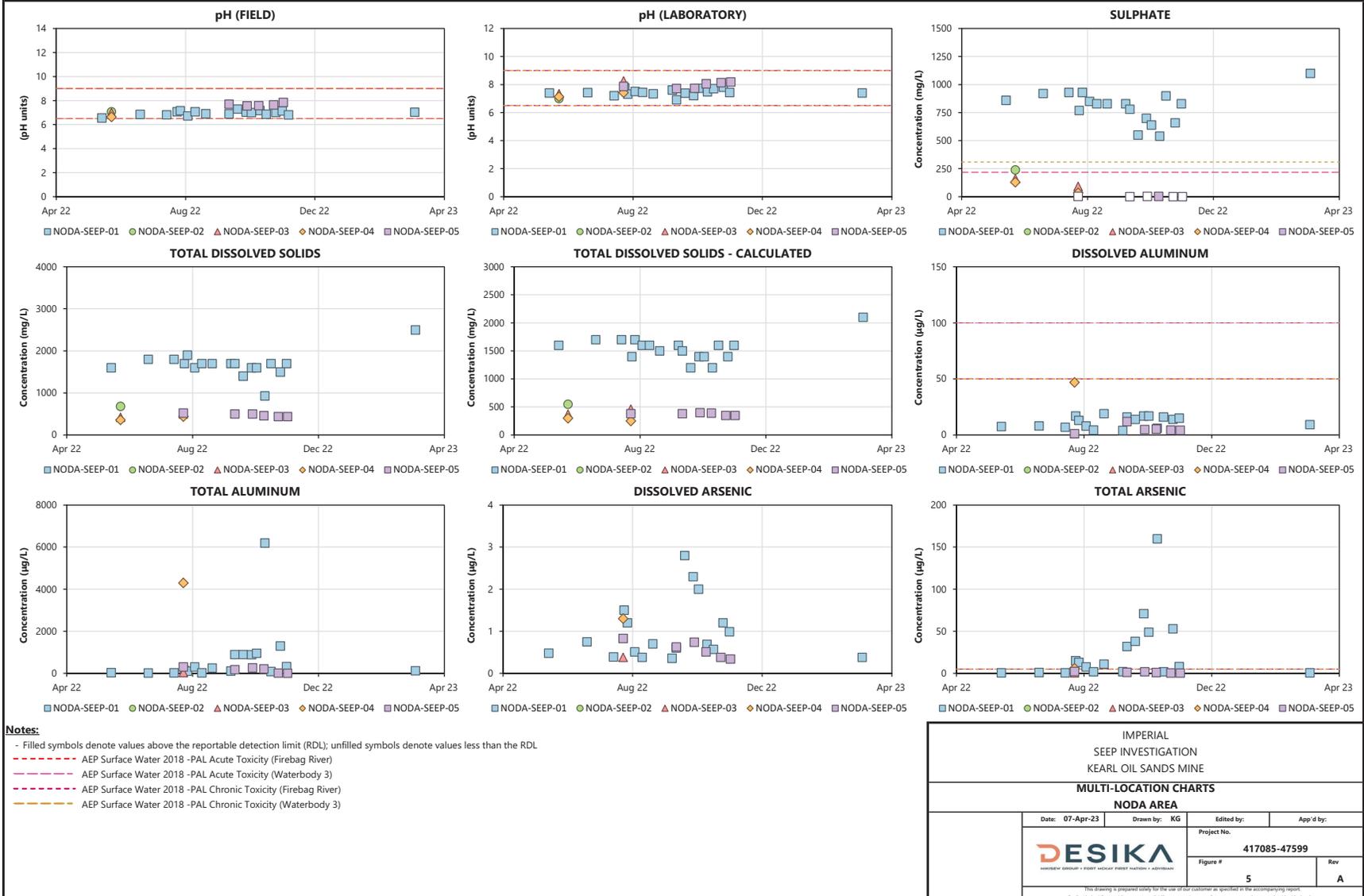
### 5.1 NORTH OVERBURDEN DISPOSAL AREA (NODA)

NODA surface water analytical results are presented in Figures 5 to 7 and tabulated in Appendix B. NODA-Seep-01 is located at the edge of the lease boundary and was sampled weekly between July and November 2022 and once in March 2023. Between November and March this seep was dry or frozen, and sampling was not possible. Water quality data for most parameters were higher at this location than the other NODA sample sites. Concentrations of sulphate, dissolved iron, total arsenic, and total zinc were consistently above either the AEP PAL guidelines or the CCME CEQGs. Between August and November 2022, concentrations of both dissolved and total arsenic and iron were generally higher than samples collected before or after this period. The sample collected in March 2023 generally had similar concentrations compared to previous monitoring results for all parameters; exceptions were sulphate, total dissolved nickel and dissolved nickel which increased compared to previous results.

NODA-Seep-02 is located approximately 150 m north of NODA-Seep-01 and was sampled only once in May 2022. Sulphate and dissolved iron concentrations exceeded the AEP PAL guidelines. This site also had the highest concentration of dissolved manganese of all the samples collected from the NODA seep sites.

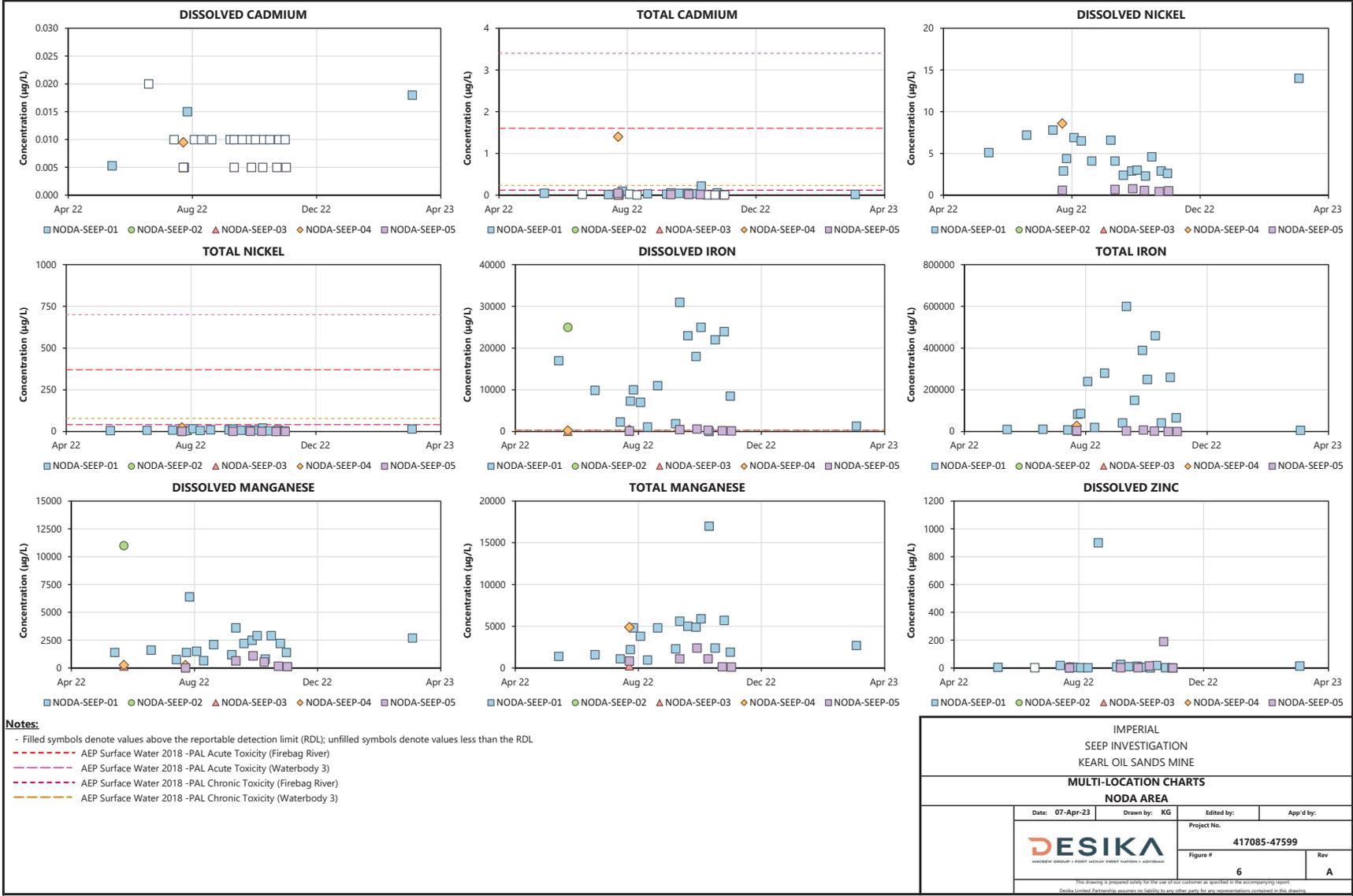
NODA-Seep-03 and NODA-Seep-04 are located approximately 400 and 585 m north of NODA-Seep-01, respectively. These sites were sampled once in May 2022 and then once in July 2022. Additional samples were not collected due to the seep being dry during subsequent sampling attempts. No exceedances were recorded for samples collected from NODA-Seep-03. However, the July NODA-Seep-04 sample exceeded or was slightly above the AEP PAL guidelines for dissolved iron, total arsenic, total cadmium, and total zinc.

NODA-Seep-05 is located approximately 1,750 m north of NODA-Seep-01. It was first sampled in July 2022 and biweekly beginning in September 2022. Concentrations of all parameters from this site were either below or within the range of values from the other sites. Sulphate and total arsenic concentrations were consistently below AEP PAL guidelines. Dissolved iron concentrations were near or slightly above the AEP PAL guideline value.



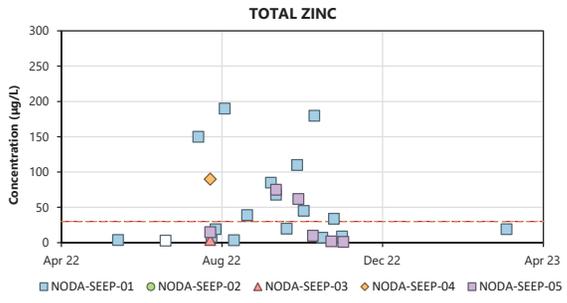
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**Notes:**

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- - - - - AEP Surface Water 2018 -PAL Acute Toxicity (Firebag River)
- - - - - AEP Surface Water 2018 -PAL Acute Toxicity (Waterbody 3)
- - - - - AEP Surface Water 2018 -PAL Chronic Toxicity (Firebag River)
- - - - - AEP Surface Water 2018 -PAL Chronic Toxicity (Waterbody 3)

|  |              |                                 |           |
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| IMPERIAL<br>SEEP INVESTIGATION<br>KEARL OIL SANDS MINE   |              |                                 |           |
| <b>MULTI-LOCATION CHARTS</b><br><b>NODA AREA</b>   |              |                                 |           |
| Date: 07-Apr-23  | Drawn by: KG | Edited by:                      | App'd by: |
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| Figure # <b>7</b>  |              | Rev <b>A</b>                    |           |
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## 5.2 WEST EXTERNAL TAILINGS AREA (WETA)

WETA surface water analytical results are presented in Figures 8 to 10 and tabulated in Appendix B. Samples from 13 sample locations were collected from the WETA seeps between May 2022 and March 2023. All samples had concentrations of sulphate below the AEP PAL guidelines and results were similar between sample locations. One sample collected from 22-Seep-02 had a dissolved aluminum concentration notably above the AEP PAL guideline but based on the remaining samples being below the guideline, this value is suspected to be an outlier caused by sampling or laboratory error. Dissolved iron concentrations were above the AEP PAL guideline in most samples and concentrations were similar to the other seep areas sampled in NODA and DP4 areas. Three samples had concentrations of total zinc that were above the guideline, but these values also appear to be outliers as most other samples were well below the guideline value. The results indicate that the seeps sampled in the WETA had similar water chemistry with most parameters having ranges in concentrations below corresponding guidelines.



**Notes:**

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- - - - AEP Surface Water 2018 -PAL Chronic Toxicity (Waterbody 3)

IMPERIAL  
SEEP INVESTIGATION  
KEARL OIL SANDS MINE

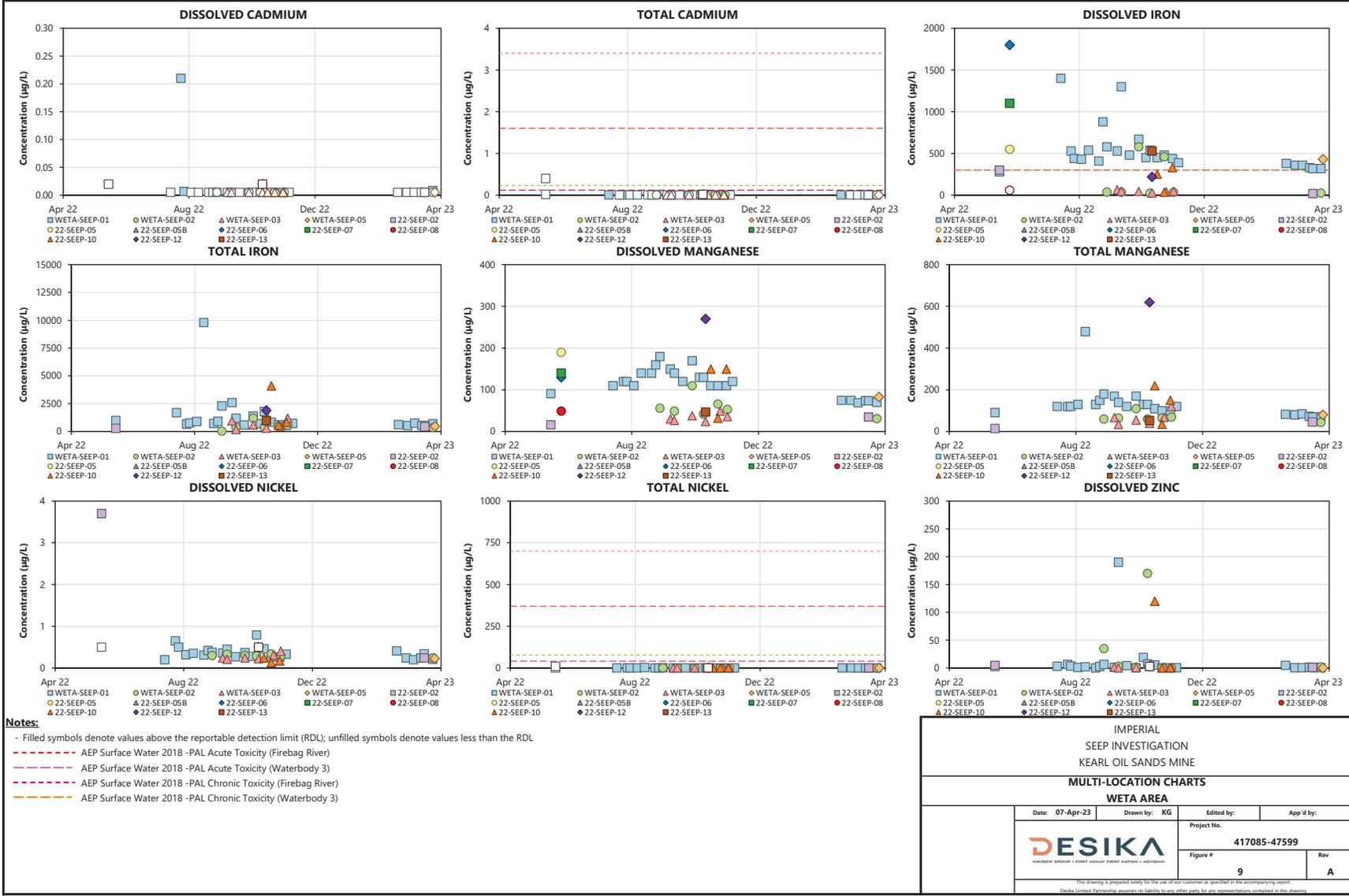
**MULTI-LOCATION CHARTS**

**WETA AREA**

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| <small>DESIKA GROUP - FIRST NATION PARTNERSHIP - ADVISIAN</small>  |              | Figure # <b>8</b>               | Rev <b>A</b> |
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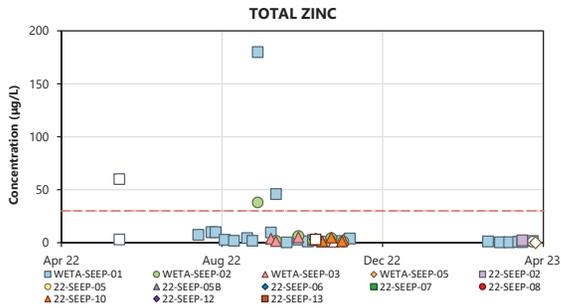
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| IMPERIAL<br>SEEP INVESTIGATION<br>KEARL OIL SANDS MINE  |              |                                    |           |
| <b>MULTI-LOCATION CHARTS</b><br><b>WETA AREA</b>  |              |                                    |           |
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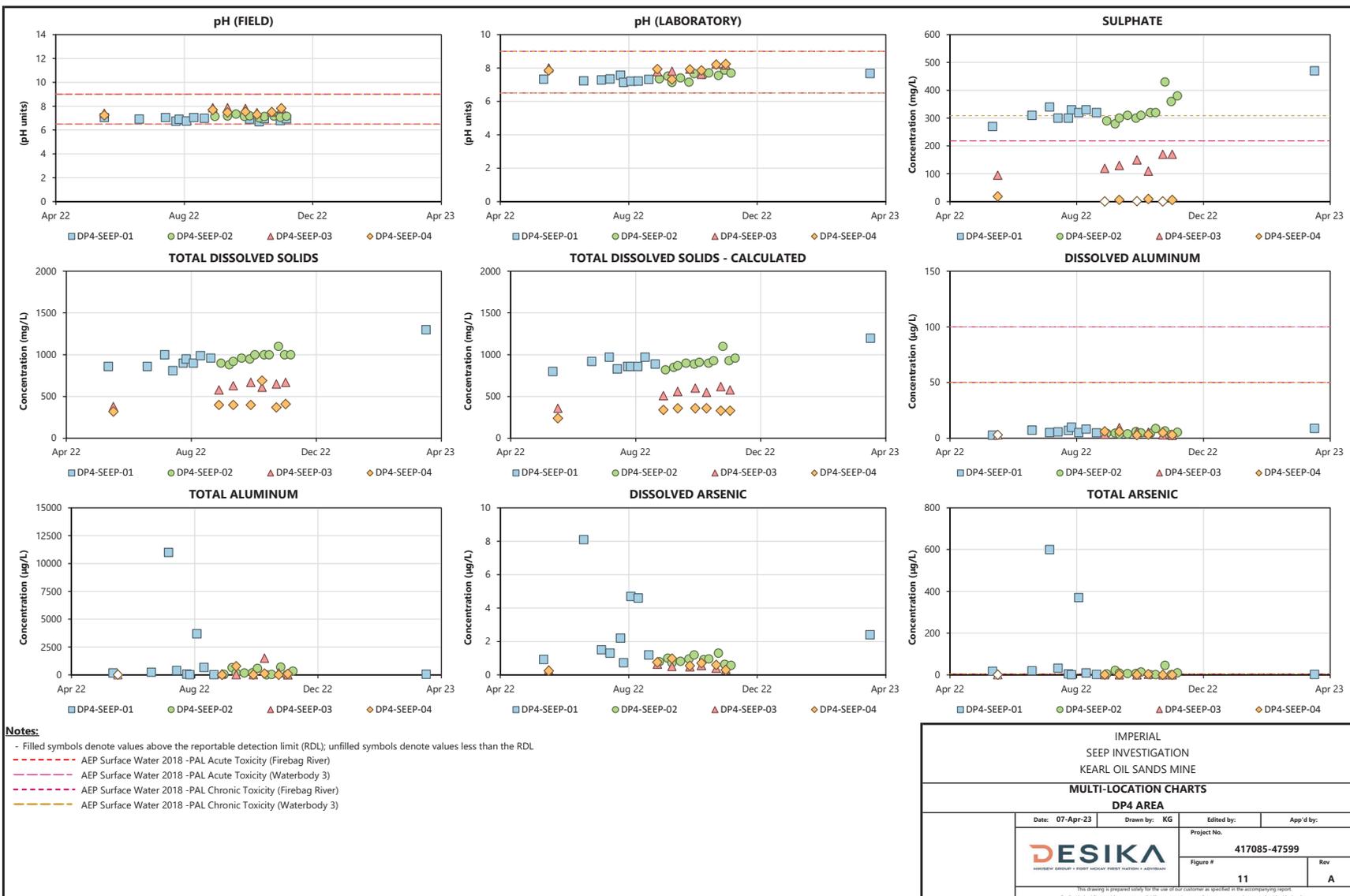
### 5.3 DRAINAGE POND 4M (DP4)

DP4 surface water analytical results are presented in Figures 11 to 13 and are tabulated in Appendix B.

DP4-Seep-01 is located on the north dyke of DP4 and just within the lease boundary. The seep was sampled weekly between July and August 2022, and then once in March 2023. Dissolved iron and sulphate concentrations were above the AEP PAL guideline in all samples. Concentrations of total arsenic, cadmium, nickel and zinc also exceeded AEP PAL guidelines in some samples collected in 2022. The sample collected in March 2023 had similar concentrations for all parameters compared to previous monitoring results with exceedances recorded for sulphate, dissolved iron, total arsenic.

Three seep sample sites (DP4-Seep-02, DP4-Seep-03, and DP4-Seep-04) were sampled from August to November 2022. Sulphate concentrations at DP4-Seep-02 were near or above the AEP PAL guideline in all samples, whereas the other sites had concentrations below the guideline by November. Site DP4-Seep-02 also had higher concentrations for total dissolved solids, total arsenic and dissolved manganese compared to DP4-Seep-03, and DP4-Seep-04. Dissolved iron concentrations exceeded guidelines in the majority of samples and a few exceedances for total zinc were recorded. These results are similar to the monitoring results from other seep sampling locations in NODA and WETA areas.

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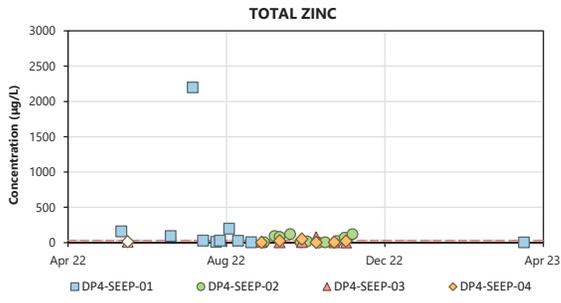
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| IMPERIAL<br>SEEP INVESTIGATION<br>KEARL OIL SANDS MINE  |              |                                 |           |
| <b>MULTI-LOCATION CHARTS</b><br><b>DP4 AREA</b>   |              |                                 |           |
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| Figure # <b>13</b>  |              | Rev <b>A</b>                    |           |
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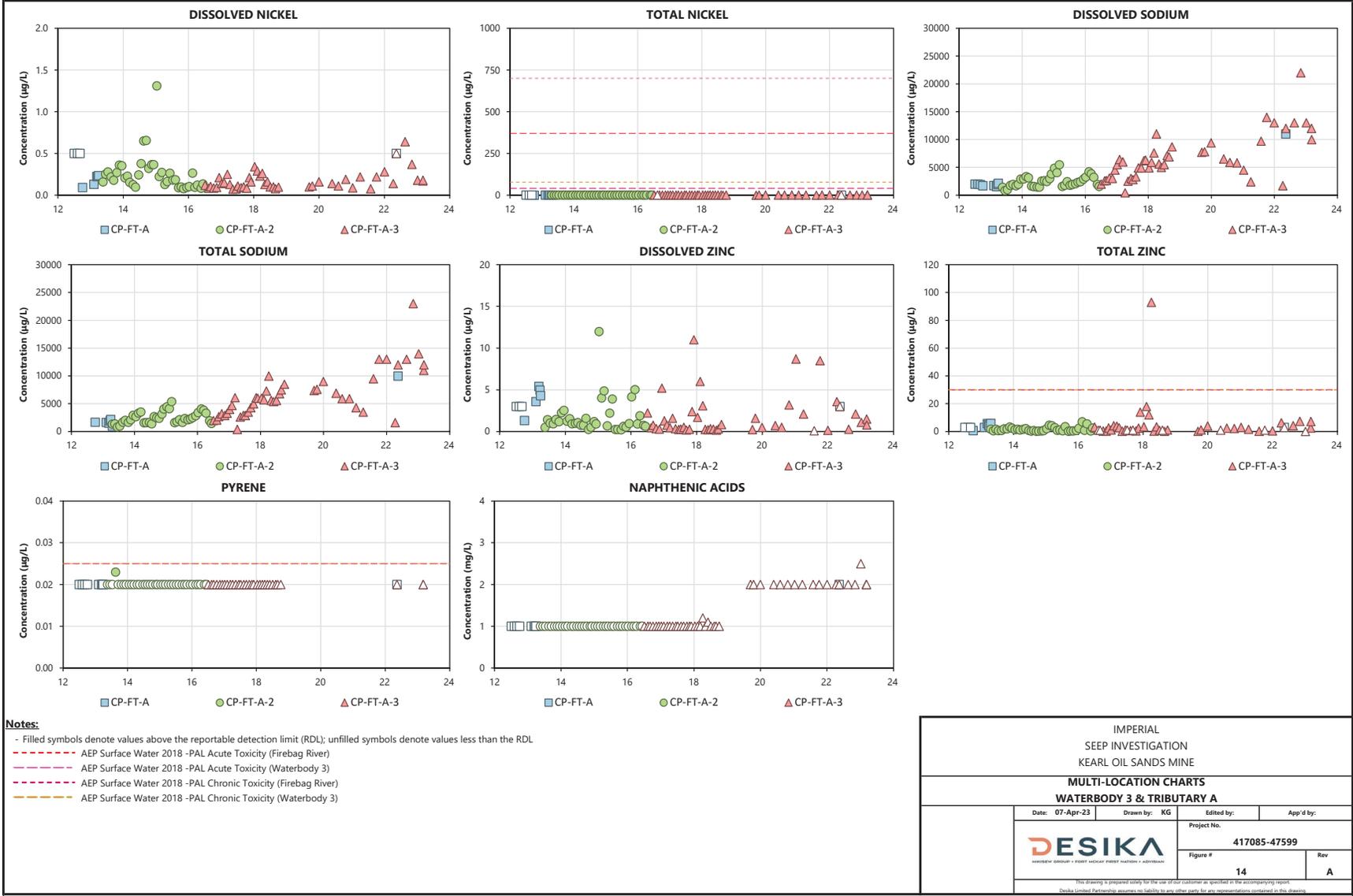
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## 5.4 WATERBODY 3 (WB3)

WB3 surface water analytical results are presented in Figures 14 to 16 and are tabulated in Appendix B. Seeps WB3-SW-11, WB3-SW-16, WB3-SW-17, WB3-SW-18, and WB3-SW-20 were sampled between 1 to 4 times from September to October 2022. Exceedances for sulphate, total arsenic and dissolved iron were intermittently recorded. WB3-SW-17 had higher concentrations of sulphate, total dissolved solids and dissolved iron when compared to the other four WB3 sites. Samples from WB3-SW-11, WB3-SW-16 had higher concentrations of total aluminum, total arsenic, total iron, and total manganese than the other locations. Results from the other parameters were generally similar in concentrations when comparing these five sample sites.

Seep WB3-SW-01 was sampled weekly between July and October 2022 and 5 times between late February and March 2023. Dissolved iron and PHC F2 exceeded AEP PAL guidelines and fluoride exceeded the CCME CEQGs. Total arsenic and sulphate concentrations exceeded the AEP PAL guideline intermittently. Sulphate, chloride and sodium were elevated above background but below applicable guidelines. Results from the 2023 samples had generally higher concentrations of sulphate, dissolved arsenic and dissolved iron. Values for other parameters were similar in concentration to the 2022 sample results.

WB3 has been sampled extensively at three locations (CP-FT-A, CP-FT-A-2 and CP-FT-A-3) beginning in 2012. Between 2012 and the discovery of the seep in May 2022, one sample in 2018 exceeded the AEP PAL guideline for total zinc. Concentrations of both total and dissolved nickel, sodium, and zinc were consistent during this period. Samples analyzed for pyrene and naphthenic acids had concentrations below detection limits except for one pyrene sample collected in late 2013. After the seep was discovered, additional samples were collected at 4 sites along the margin of the waterbody closest to the seep between May 2022 and April 2023. The water samples collected from WB3 after the seep occurred show no increase in concentrations for any parameters when compared to historical data. Concentrations of metals and sulphate were lower in samples collected from WB3 than the seep sample sites. This suggests that the surface water chemistry of WB3 has not been impacted by the seeps.



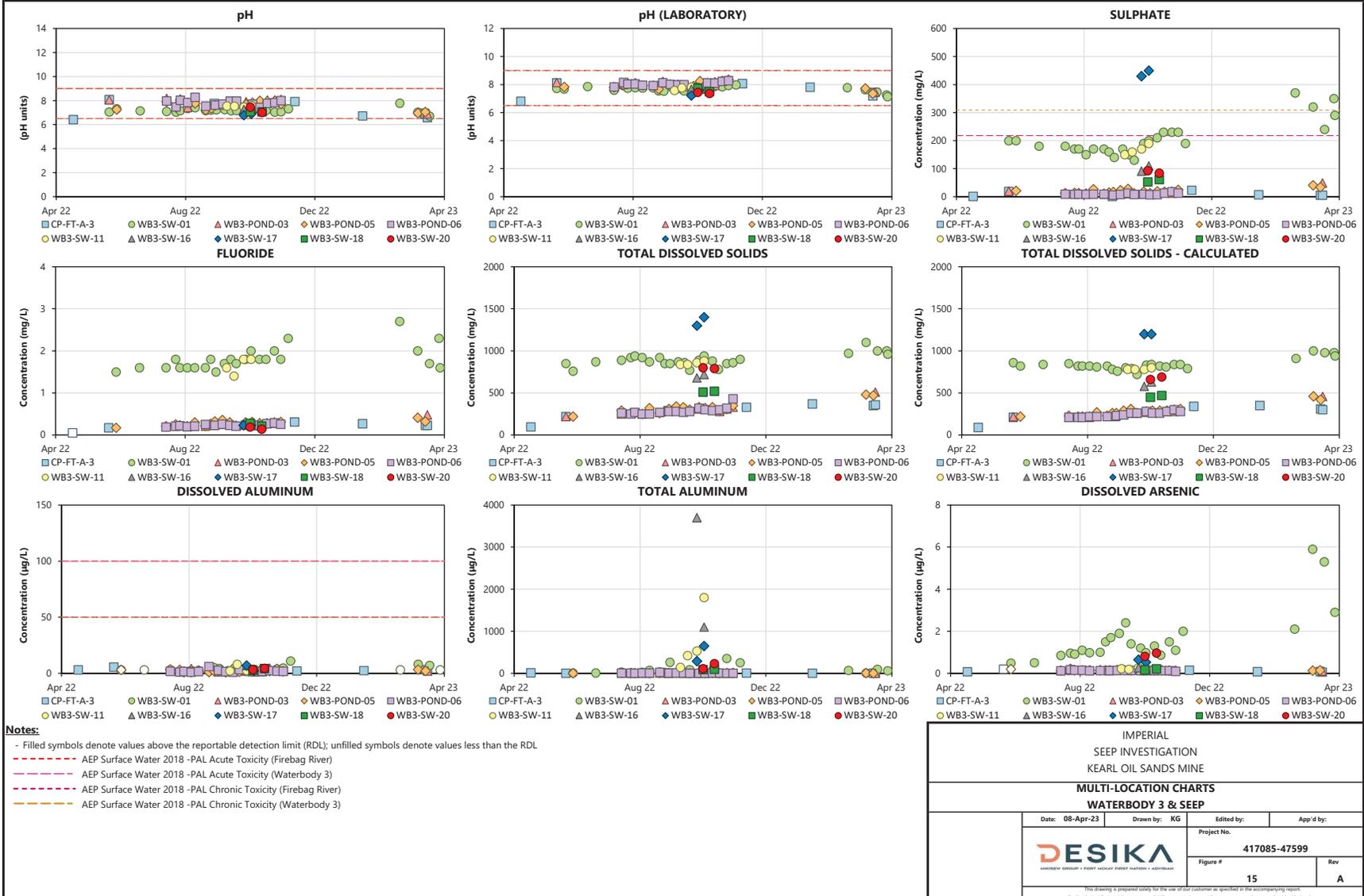
**Notes:**

- Filled symbols denote values above the reportable detection limit (RDL); unfilled symbols denote values less than the RDL
- - - - - AEP Surface Water 2018 -PAL Acute Toxicity (Firebag River)
- - - - - AEP Surface Water 2018 -PAL Acute Toxicity (Waterbody 3)
- - - - - AEP Surface Water 2018 -PAL Chronic Toxicity (Firebag River)
- - - - - AEP Surface Water 2018 -PAL Chronic Toxicity (Waterbody 3)

|  |              |             |              |
|--|--------------|-------------|--------------|
| IMPERIAL<br>SEEP INVESTIGATION<br>KEARL OIL SANDS MINE   |              |             |              |
| <b>MULTI-LOCATION CHARTS</b><br><b>WATERBODY 3 &amp; TRIBUTARY A</b>   |              |             |              |
| Date: 07-Apr-23  | Drawn by: KG | Edited by:  | App'd by:    |
|   |              | Project No. | 417085-47599 |
|  |              | Figure #    | 14           |
|  |              | Rev         | A            |
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## 5.5 FIREBAG RIVER (FB)

The Firebag River has been sampled downstream of the KOSM site from 2013 to 2022, and the data is presented in Figures 17 to 19 and Appendix B. Samples collected during this period frequently exceeded the AEP PAL guideline for dissolved iron. Concentrations of sulphate and naphthenic acids were near or below detection limits for all samples. After the observation of the seeps in May 2022, sampling was completed at one location upstream of the KOSM site, three sites directly north of the lease and one downstream location. Water quality results from all the sites were similar and there was no discernible difference in the water chemistry between any of the sample sites. Dissolved iron concentrations did periodically exceed the AEP PAL guideline in samples collected after the seep was discovered. However, the concentrations of all parameters were similar to values recorded within the Firebag River before the seeps occurred.



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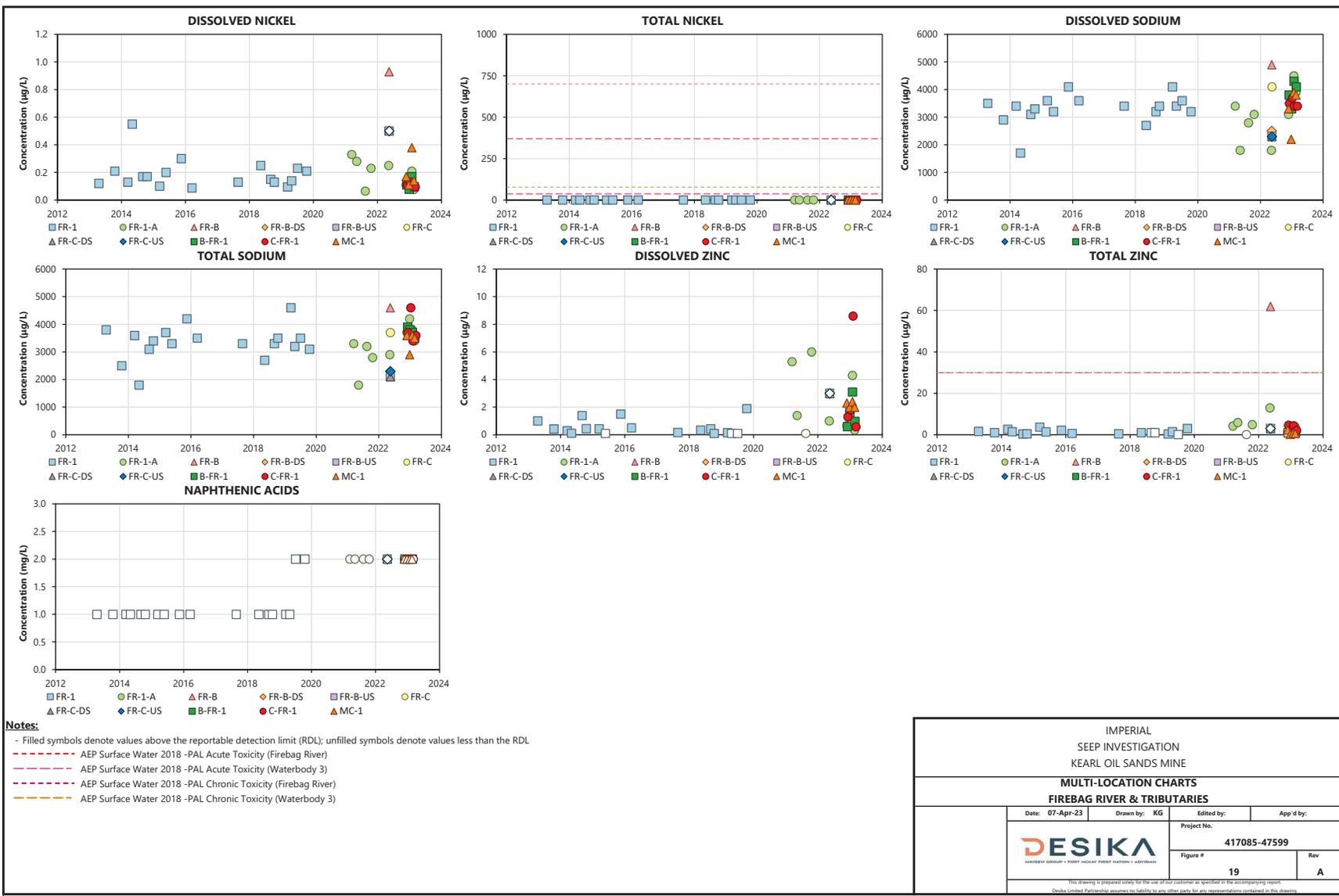
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|   |              |                                    |                 |
|---|--------------|------------------------------------|-----------------|
| IMPERIAL<br>SEEP INVESTIGATION<br>KEARL OIL SANDS MINE<br><b>MULTI-LOCATION CHARTS</b><br><b>FIREBAG RIVER &amp; TRIBUTARIES</b>  |              |                                    |                 |
| Date: 07-Apr-23   | Drawn by: KG | Edited by:                         | App'd by:       |
|    |              | Project No.<br><b>417085-47599</b> | Rev<br><b>A</b> |
| Figure #<br><b>18</b>   |              |                                    |                 |
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## 6 DISCUSSION

Based on the water sampling results from 2022, Imperial characterized the composition of the seeps and contributions from process affected water and coarse sand tailings porewater. Coarse Sand Tailings and Process Affected Water are generated as a waste product from the extraction and processing of bitumen from oilsands (Sutton et al. 2022; Gault 2019). While the majority of process-water is recycled through centrifugation or gravitational settling, a portion remains in the pore spaces of the sand particles, leaving residual quantities of salts and hydrocarbons in the pore-water (Simhayov et al. 2017). Process affected water generally contains a complex and environmentally persistent dissolved organic mixture that can be toxic to aquatic organisms (Gault 2019).

A water sample was collected from the DP4-Seep-01 location on March 18 following the overland release of 5,300 m<sup>3</sup> of industrial wastewater from DP4. The majority of parameters were similar to historic results for the location with the exception of a detectable concentration of naphthenic acids and a concentration of F2 hydrocarbons that was above guideline. Sampling of the DP4 pond is proposed to be completed as part of the 2023 surface water monitoring program under the EPO issued to Imperial by the AER.

In 2023 Imperial will complete the drilling of additional groundwater monitoring wells both within and outside of the lease boundary at all seep locations. These wells will provide additional ground water quality data to characterize the seeps and monitor the affected areas for any groundwater movement or changes in chemistry.

Under the Condition 14 of the EPO, Imperial will submit the results and analysis for the surface and groundwater sampling program on a weekly basis to the AER. The sampling program will monitor affected areas and indicate whether receiving areas and waterbodies including the Firebag River, and Waterbody 3 have been affected.

Based on the water quality data collected in 2022 and March 2023, there has been no evidence of adverse impacts to the Firebag River or Waterbody 3. Proposed mitigation and additional monitoring measures to be employed by Imperial in 2023 (including, but not limited to, interception trenches, pumping wells, backfilled areas, drilling groundwater monitoring wells, and establishing additional surface water monitoring sites) are expected to prevent further release events and provide more information on the potential effects of the release events.

## 7 CLOSURE

Surface water quality data, charts and figures used in this memo were prepared by Desika Limited Partnership and were provided to WSP by Imperial. WSP assumes no liability for the information presented in these charts, figures, and the data attached in the appendices. This report is based on information and conditions at the time of data collection as referenced in the report. Conclusions reached in this memo are based on third party data for which WSP assumes no liability. WSP has performed its services in a manner consistent with the standard of care and skill ordinarily exercised by members of the profession practicing in Alberta at the time that the services were performed. If you have any questions, please feel free to contact the undersigned at 403-660-3668.

Sincerely,

*Reviewed by:*

██████████, B.Sc., P.Biol., R.P. Bio.  
Aquatic Biologist

██████████, B.Sc., P.Biol., R.P. Bio.  
Associate Aquatic Biologist

## 8 REFERENCES

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# Appendix A

## EPO Surface Water Sampling Locations





# Appendix B

## Surface Water Quality Data Tables

































































































































































