

TAB 9

Ralph, Peter

From: Chippett, Jamie
Sent: Wednesday, January 16, 2019 9:31 AM
To: 'GBennett@nalcoreenergy.com'
Cc: DeanneFisher@nalcoreenergy.com; smarshall@nalcoreenergy.com
Subject: RE: Wetland Capping initiative

Gilbert,

Noted. This is consistent with our discussion on Monday. I am available at any point in time to discuss path forward.

Jamie

From: GBennett@nalcoreenergy.com <GBennett@nalcoreenergy.com>
Sent: Wednesday, January 16, 2019 9:04 AM
To: Chippett, Jamie <JamieChippett@gov.nl.ca>
Cc: DeanneFisher@nalcoreenergy.com; smarshall@nalcoreenergy.com
Subject: Wetland Capping initiative

Jamie,

Further to our discussions on Monday regarding potential wetland capping, there are a number of points arising from the SNC-Lavalin report on wetland capping that need to be carefully considered in determining next steps.

In their report to the IEAC, SNC Lavalin assumed that work would be undertaken starting in the fall of 2018 and completed prior to April 2019 (Ref SNC-L Report, Attachment 2 - Assumptions). Section 5 of the report outlines the assumption that work be completed prior to the 2019 spring freshet, which in turn is prior to impoundment in 2019. They assumed that the contractor for the work would be mobilized over the summer and fall of 2018 so that work could be undertaken during the winter of 2018-19. That construction window is no longer available to us.

On the other end of the schedule, we are now running up against our impoundment window, which begins mid July and runs until September 30, 2019. From a construction perspective, we need to maintain the impoundment schedule and impound as early as possible to complete the spillway concrete placement and to permit commissioning activities for Unit 1 in advance of first power this year.

The areas targeted for capping are low lying wetlands, and as such, site conditions will not enable construction activities until after spring has passed and conditions have dried out this summer. Further, six of the 10 prospective areas are on the south bank of the Churchill River and access from our previous reservoir clearing program would have to be re-established before we could access those areas. I don't see a scenario where a contractor could complete the capping work after the spring thaw and before scheduled impoundment in mid July.

To summarize, the conditions assumed by SNC Lavalin in their report for the IEAC are no longer applicable, and consequently their execution plan and cost estimates are no longer valid. To understand what could be

undertaken given the current situation, I have asked SNC Lavalin to identify whether any mitigation might be available to us. This could be in the form of work done after impoundment, which they discussed briefly in their report, or through some alternate approach that they may be able to suggest.

Gilbert



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