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ETUS-003
Paramount RE: REA

June 14, 2004

Mackenzie Valley Environmental Impact Review Board
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MACKENZIE VALLEY
ENVIRONMENTAL IMPACT
REVIEW BOARD

Attention: Todd Burlingame, Chair

Dear Sir:

**Re: MVEIRB Report of Environmental Assessment and Reasons for Decision
for Paramount Resources Ltd Cameron Hills Extension Project EA 03-005**

As you know the Mackenzie Valley Environmental Impact Review Board ("MVEIRB" or the "Board") issued the Report of Environmental Assessment and Reasons for Decision on the Paramount Resources Limited Cameron Hills Extension Project on June 1, 2004 (the "Report").

Paramount has previously acknowledged the newness of the northern regulatory regime and the challenges regulatory tribunals face. It is essential that the regime evolve in a way that ensures fairness to all stakeholders while accommodating the industry's legitimate exploration and development pursuits. In that context, Paramount wishes to provide its comments on some of the measures that have been recommended (the "Recommendations") by the MVEIRB for your consideration.

As a preliminary matter, Paramount wishes to express its concern that a number of the Recommendations appear to fail to take into account uncontradicted evidence provided by Paramount. Independent consultants retained by Paramount, Golder Associates, conducted an extensive assessment using accepted engineering and environmental methodologies to determine that there would be no significant adverse effects of the Project. While the MVEIRB is certainly entitled to reach a different conclusion than that put forward by Paramount and its consultants, it must do so in accordance with the evidence presented to it and current federal and territorial legislation and guidelines. In a number of cases, the Recommendations fail to do so. Paramount's comments below will specifically set out where this is the case.

Recommendation 1

The Review Board recommends that regulatory authorities include in their authorizations those items set out in the Developer's commitments, outlined in Appendix A, that are within their jurisdiction.

Paramount's Comments:

Paramount has no comment on this recommendation.

Recommendation 2

The Review Board recommends that Paramount prepare a report within 12 months and thereafter, annually, until the developments on the SDL are abandoned and restored, for distribution in plain language to the parties in this EA. This report will outline the implementation status of each commitment made during the course of this EA, as set out in Appendix A.

Paramount's Comments:

To minimize the duplication of effort, Paramount suggests that this recommendation be deleted. As outlined in Recommendation 1, Paramount's commitments will be monitored and enforced by the regulators empowered to do so. Paramount suggests that interested parties should be able to obtain information regarding compliance and enforcement activities by contacting the appropriate regulatory body.

Recommendation 3

The Review Board recommends that prior to the issuance of any further licenses or permits Paramount install a meteorological station (at minimum must monitor wind speed, wind direction and temperature) in the Cameron Hills SDL to gather baseline data related to its development. Meteorological data will be provided annually to air quality staff of GNWT-RWED and Environment Canada along with a detailed re-modeling of Paramount's various development scenarios to ensure onsite meteorological conditions are reflected in the modeled outputs.

Paramount's Comments:

Paramount suggests that this recommendation be amended to reflect the following: The air quality assessment completed as part of the DAR confirmed that all air quality guidelines would be met not only for the proposed development but also for all of Paramount's planned activities in the Cameron Hills. While Environment Canada also independently confirmed that the current application as well as the planned developments in the Cameron Hills would meet all relevant guidelines, Paramount recognizes that concerns remain regarding the use of meteorological data from Fort Smith. Though Paramount believes that it is not necessary, we are willing to install a meteorological station to collect a full year of on-site data. Since the draft modeling guidelines for the Northwest Territories confirm that the use of one year of on-site or five years of data from a nearby airport are suitable for dispersion modeling, the station would be decommissioned once a full year of data were collected.

As stated by Paramount's Corporate Operating Officer for the region, Mr. Doyle, during the MVEIRB hearings (Volume 1, page 75 lines 18 through 23), air modeling has been completed each year when new developments are put forward and he felt this practice of completing air modeling to confirm compliance with the guidelines will continue. Once a full year of on-site meteorological data has been gathered, it is likely that this data would be used in future air modeling.

Recommendation 4

The Review Board recommends that Paramount install a continuous gas analysis monitoring system to track ambient air quality (at minimum 1 hour SO₂ and NO₂) and provide the data to the general public via website, to be updated no less than monthly if a live connection is not available. Annual reports on the status of the air quality at Cameron Hills will be provided by Paramount to all potentially affected communities and government in a plain language document throughout the life of the Paramount operations at Cameron Hills.

Paramount's Comments:

Paramount suggests that this recommendation be deleted. There is no precedent in the Northwest Territories for requiring the installation of a continuous air-monitoring trailer nor was any evidence presented that indicated there was a need. Conservative dispersion modeling indicated that all applicable guidelines would be met for both the proposed development as well as for all of Paramount's planned activities in the Cameron Hills. Environment Canada independently confirmed that all relevant guidelines would be met for the proposed current application, therefore, annual reporting should not be required.

Recommendation 5

The Review Board recommends that Paramount install an amine fuel sweetening unit at the Central Battery (H-03) location prior to bringing any further wells online or pipe in sweet fuel from outside Cameron Hills, as per Paramount's original development plan.

Paramount's Comments:

Paramount suggests that this recommendation be deleted. The conservative dispersion modeling results presented in the DAR as well as Environment Canada's independent analysis confirm that all relevant air guidelines will be met for the currently proposed application. Therefore an amine-sweetening unit is not required. During the hearing, Mr. Doyle indicated that: "*Paramount is not currently undertaking to install the amine unit and the earliest that it could be installed would be 2005. Paramount would endeavor to install this technology at a time in which it would maximize shareholder value.*" (Volume 1, page 72, lines 14 through 19). This would include the economic evaluation of an additional two million (\$2,000,000) dollar investment for the installation of an amine unit.

The GNWT representatives at the hearing acknowledged that the current SO₂ guideline levels are "protective of health" and "protective of the environment"

[Transcript Vol I, p. 202, lines 10-13, 23-25]. All of Paramount's modeling showed that its emissions would be within the guidelines. There was no evidence produced that contradicted this modeling, other than comments that it was "difficult to verify that the values used in the emission estimates represent worse case" [Transcript Vol I, p. 171, lines 9 to 14]. There was no basis, other than the general point that less pollution is always better, for the Board to conclude that the air emissions would be problematic or that the additional mitigation measures are required. In the absence of evidence that Paramount's modeling is flawed, there is no basis for requiring Paramount to exceed current guidelines.

Recommendation 6

The Review Board recommends that any further combustion engines being installed for line heaters and pumpjacks at the Cameron Hills operation must use the sweetened fuel or an alternate source of no sulphur fuel.

Paramount's Comments:

Paramount suggests that this recommendation be deleted. There is no evidence, nor any legislation supporting a prohibition on the use of sour fuel for developments such as Cameron Hills. In many cases, using available fuel in a safe manner is the most energy efficient manner to power heaters and pumpjacks at Cameron Hills. In some cases, Paramount has made use of electric pumps and avoided using heaters where such solutions were practical and efficient. In addition, the conservative dispersion modeling confirms that all relevant guidelines will be met even when sour fuel is used at the approved and current applied for equipment.

Recommendation 7

The Review Board recommends that the Government of Canada (INAC and Environment Canada) and the Government of the Northwest Territories, implement recommendation 7 from the Ranger-Chevron EA by June 2005.

Paramount's Comments:

Paramount understands that Recommendation 7 from the Ranger-Chevron EA to be as follows:

Air Quality – The Review Board recommends that the GNWT and Environment Canada, working with industry and affected communities, develop enforceable air quality guidelines or standards for the oil and gas industry operating in the NWT, or adopt regulations from adjoining jurisdictions as appropriate. These guidelines should include the use of latest technologies and good industry practices, and a system of monitoring that would be sufficient to build a baseline database over the long-term, and to demonstrate the maintenance of existing environmental quality.

The Review Board recommends that any baseline data so developed be compiled annually and contribute to the overall cumulative effects monitoring framework to

be established under Part VI of the MVRMA when it is implemented and be made available to the public immediately.

The Review Board recommends that the GNWT and Environment Canada outline a work plan to satisfy this recommendation within four months of this decision.

The developer is encouraged to participate in the NWT Greenhouse Gas Emissions Reduction Strategy, which is a GNWT multi-stakeholder initiative to limit greenhouse gas emissions.

It is Paramount's understanding that the Government of the Northwest Territories has already started this process and has produced a draft Code of Practice for the Upstream Oil and Gas Industry. Paramount and the Canadian Association of Petroleum Producers (CAPP) and Paramount's consultant (Golder Associates) have participated in this process and have provided the GNWT with extensive input and feedback regarding the draft code. The design of the Cameron Hills project and the air modeling completed as part of the DAR follows the draft code of practice and the results comply with all relevant guidelines. In addition, the GNWT has already installed and is operating ambient air monitoring stations at key locations within the Northwest Territories.

Recommendation 8

The Review Board recommends that Paramount modify its spill reporting procedures for the Paramount Cameron Hills developments to include notice of spill occurrences to potentially affected communities. Spills must be reported according to the NWT Spill Reporting Procedures.

Paramount's Comments:

Paramount suggests that this recommendation be deleted. Paramount currently reports spills adhering to the NWT Spill Reporting Procedures and the National Energy Board (NEB) requirements for Frontier Lands. In addition, as stated in Paramount's testimony, Paramount's Emergency Response Plan already mandates notification to communities where such communities are potentially affected by a spill. As a result, no modification to the spill reporting procedures is required.

Recommendation 9

The Review Board recommends that Paramount continue to monitor all work sites for erosion, and take appropriate measures in advance to avoid such problems. The Review Board recommends appropriate erosion mitigation measures be identified in advance and authorized by the NEB and INAC inspectors, and that any remediation of sites be documented and reported to regulators and the Ka'a'Gee Tu First Nation on a quarterly basis.

Paramount's Comments:

Paramount suggests that this recommendation be deleted. Paramount is already designing the appropriate mitigation, obtaining the required permits and licences, and

reporting to the appropriate regulatory agencies on erosion. The information regarding their efforts is publicly available and in addition, field activity is generally conducted during the winter season only, and therefore Paramount sees no basis for quarterly reporting to regulators and/or the public.

Paramount has committed to ongoing monitoring of our operations at Cameron Hills, through the efforts of the on-site production operators. To this end, Paramount has produced the Cameron Hills Operator Erosion Monitoring Manual (Golder Associates 2003) and subsequently implemented training for its employees and contractors. This document outlines corporate communication links to address potential issues, and as relevant the notification of the Mackenzie Valley Land and Water Board (MVLWB), Department of Fisheries and Oceans (DFO), the NEB, and the Indian and Northern Canada (INAC), to ensure regulatory compliance.

In response to erosion issues identified in the spring of 2002, Paramount completed the Environmental Assessment and Remediation Plan For the Erosion Issues at the Paramount Resources Ltd. Cameron Hills Gathering System and Transborder Pipeline (Parkvalley, August 7, 2002) and the Erosion Survey and Mitigation Plan for the Cameron Hills Gathering System and Pipeline (Golder Associates 2002), considering the Environmental Inspection Report, Land Use Permit MV2000P0055 prepared by INAC (2002). The Paramount remediation plan report was completed, and submitted to INAC, MVLWB and the NEB for their approval. Paramount has, or is the process of, completing the recommendations outlined in this report, and has received positive feedback about their efforts from the regulators.

Paramount has Land Use Permits and Water Licences from the MVLWB for their projects, as well as the appropriate approvals from the NEB and INAC. All the license and/or permit applications have been accompanied by environmental assessments that outline the proposed erosion mitigation measures to be applied to that particular project component. Further, Paramount responds to findings and recommendations from the INAC Land Use Inspector Reports related to the Cameron Hills project. As such, all information provided to the regulators becomes publicly available information.

Recommendation 10

The Review Board recommends that Paramount, in the case of isolated water crossings, maintain downstream water flow at pre-in-stream work levels. All in-stream work must be completed as expediently as possible to mitigate disruption of fish movements.

Paramount's Comments:

Paramount suggests that this recommendation be deleted. Paramount complies with DFO guidelines, regulations and the Fisheries Act that protects fish and fish habitat; therefore this recommendation is a duplication of existing regulatory requirements.

Recommendation 11

The Review Board recommends that the Department of Fisheries and Oceans conduct regular site visits to the Cameron Hills to inspect for determine if any impacts to fish or fish habitat. Reports of these inspections must be made publicly available via DFO and also be sent directly to the Ka'a'Gee Tu First Nation, in a plain language version.

Paramount's Comments:

Paramount has no comment on this recommendation

Recommendation 12

The Review Board recommends that RWED will, within the next six months, initiate the formation of a Deh Cho Boreal Caribou Working Group (DCBCWG). The Working Group will, among other things, consider: habitat identification, range plan development, thresholds, monitoring systems, adaptive mitigation, research programs and cumulative effects models. In addition, it will coordinate its activities with similar working groups in Alberta and British Columbia.

Paramount's Comments:

Paramount suggests that this recommendation be deleted as it refers to the more general jurisdiction of the Government of the Northwest Territories and is not a measure that will specifically mitigate any adverse effects of the Project. Further, Paramount has committed to participating in a Boreal Caribou Working Group, once it has been formed in the NWT, and providing in-kind support in the form of use of our camp and facilities at Cameron Hills.

Recommendation 13

The Review Board recommends that the MVLWB adopt an average linear disturbance target of 1.8 km per km² as a boreal caribou disturbance threshold for the entire Cameron Hills, NT area, in order to prevent significant adverse environmental impacts on boreal caribou populations whose range includes the Paramount SDL and surrounding area. This shall be considered in all future land use applications for the area.

Paramount's Comments:

Paramount suggests that this recommendation be deleted. The peer reviewed science presented by Paramount, as it relates to caribou, sensory disturbance and access, appears to have been discounted, or not considered during the analysis. There is no justification presented in the Environmental Assessment Report for the value of 1.8 km per km² value, and the relevance of any studies with respect to study area, habitat quantity and quality, existing disturbance, assess density, etc. have not been presented. Paramount is particularly concerned by the fact that it provided considerable evidence to refute the comments by the GNWT on boreal caribou, and yet there is no reference to any of this evidence in the MVEIRB's discussion of impacts on caribou at page 35 of the Report, suggesting that Paramount's evidence in this regard did not receive the Board's consideration.

As currently worded, the reference to linear disturbance is too broad, and would preclude required components of oil and gas, such as 3D seismic, even where it is low-impact. The recommendation provides no reference to the area that should be used to calculate the average. Paramount does not believe that the general reference to the linear disturbance value of 1.8 km per km² is scientifically defensible, unless it is in reference to developed highways, roads, pipelines, or railway lines that would typically increase access into the area. This is not the case currently presented for the Cameron Hills. The project is in a remote location, has vehicle access only during the winter months (with the access gated), and with no large communities or cities in close proximity (i.e., potential for access is minimal). Disturbance to caribou is particularly related to chronic human use of trails or roads within a known caribou range.

The Recommendation mentions the boreal caribou populations whose range includes the Paramount SDL and surrounding area. Kakisa stated at the Kakisa community meeting, that most caribou were found north of the Cameron Hills, between Tathlina Lake and Kakisa Lake. Most sightings of Boreal Caribou during Paramount's winter construction occurred in Alberta south of the SDL. No caribou tracks have been recorded during the winter track count surveys.

Much of the research and models developed for caribou by the Boreal Caribou Committee in Alberta, deal with habitat effectiveness targets for caribou ranges in Alberta, for which there has been extensive historical caribou location data, range data and population data collected. None of this information is available for the Cameron Hills.

Further, Recommendation 12 suggests that RWED initiate the formation of a Deh Cho Boreal Caribou Working Group that would consider several factors, including thresholds. Until such time as work was completed in the NWT to address this issue in a scientific manner, with the involvement of industry, Paramount suggests that establishing any unsubstantiated thresholds or limits is premature.

Recommendation 14

The Review Board recommends that Paramount locate at least 50% of all proposed and planned development in the Cameron Hills SDL, as described in Paramount's Developer's Assessment Report, on areas that are currently disturbed (as of the date of Ministerial approval of this Report of Environmental Assessment). This requirement should be included as a condition in land use permit MV2002A0046.

Paramount's Comments:

Paramount suggests that this recommendation be re-worded. Paramount does support utilizing as much existing linear disturbance as is technically and environmentally practical and we hope to greatly exceed the 50% amount on much of our planned development where existing disturbance exists. It is not possible to locate at least 50% of all proposed and planned development in the Cameron Hills SDL, on areas that are currently disturbed, particularly seismic and exploration programs which are

typically done to explore previously undisturbed areas. It is only after seismic has been completed that disturbance corridors are created that can be used for drilling access, pipelining and facilities construction and operations. The current wording of the Recommendation would certainly eliminate activity on certain areas of the SDL.

Paramount would suggest, that alternative wording could be: "The Review Board recommends that Paramount maximize the use of existing disturbance corridors, as technically and environmentally feasible, for all proposed and planned projects."

Recommendation 15

The Review Board recommends that Paramount and the other parties to the unfinished Cameron Hills Wildlife and Resources Harvesting Compensation Plan developed in response to measures 13 and 15 of EA01-005 complete the compensation plan. If a compensation plan cannot be completed by these parties within 90 days of the federal Minister's acceptance of this report, this matter will proceed to binding arbitration, pursuant to the NWT Arbitration Act. A letter signed by the parties, indicating agreement to the compensation plan or in the case of arbitration, the arbitrator's decision must be filed with NEB and MVLWB prior to the commencement of Paramount's operations under land use permit MV2002A0046.

Paramount's Comments:

Paramount is extremely concerned by the fact that the Compensation Plan must be completed prior to commencement of operations under the land use permit. This appears to give one side an ability to extract concessions by using delay of the Project. Evidence provided in the EA process confirmed that Paramount provided full participation and cooperation in the negotiation/mediation process and that the Ka'a'Gee Tu First Nation chose to not participate and the other communities requested the process be put on hold. In addition, the MVEIRB's conclusion regarding the reason that the process failed to bring about an agreement appears to be inconsistent with the statement by the mediator in his letter dated March 18, 2003 to INAC. This letter states "...there is a desire to put the mediation process 'on hold' at this time. My understanding that the communities are currently making decisions on the overall approach that will be used for oil and gas related projects. This includes the Cameron Hills mediation process." In Paramount's view, it is inappropriate for the project start to be delayed until the agreement is finalized.

Recommendation 16

The Review Board recommends that the GNWT develop a socio-economic agreement with Paramount in consultation with affected communities before operations proceed under the land use permit MV2002A0046. The socio-economic agreement is to address issues such as employment targets, educational and training opportunities for local residents and a detailed ongoing community consultation plan.

Paramount's Comments:

Paramount suggests that this recommendation be deleted. As with Recommendation 15, Paramount is very concerned about the potential for the development of this

agreement to unduly delay the commencement of the Project. Paramount is in compliance with current legislation and regulation and has a Benefit Plan signed by the Minister of INAC. Significant information was provided during this EA process to demonstrate that Paramount has fulfilled or exceeded its requirements under the Benefit Plan.

Recommendation 17

The Review Board recommends the KTFN be notified directly if any heritage resources are suspected or encountered during Paramount's activities in the Cameron Hills.

Paramount's Comments:

Paramount suggests that this recommendation be deleted. As stated in the *Summary of Legislation Protecting Heritage Resources in the Northwest Territories* (PWNHC no date), sections 6(a) and 12 of the Mackenzie Valley Land Use Regulations state:

"6(a). Unless expressly authorized by a permit or in writing by an inspector, no permittee shall conduct a land use operation with 30 m of a known monument or a known or suspected historical, archaeological site or burial ground; and

12. Where, in the course of a land use operation, a suspected historical or archaeological site or burial ground is discovered,

(a) the permittee shall immediately suspend operations on the site or burial ground and notify the Board or inspector; and

(b) the Board or inspector shall notify any affected First Nation and the department of the Government of the Northwest Territories responsible therefore of the location of the site or burial ground and consult them regarding the nature of the materials, structures or artifacts and any further actions to be taken."

As per Paramount's previous commitments and IR responses (e.g., IR 1.2.42), if previously unknown historical or archaeological sites were discovered during Paramount's operations, including the on-going monitoring of well site and pipeline construction, work would immediately cease at that location and the Board or Land Use inspector would be notified. As per the above legislation, it is the Board or the Land Use Inspector that is to notify any affected First Nation.

Suggestion 1

The Review Board suggests that a member of the Ka'a'Gee Tu First Nation be invited by DFO to accompany its inspectors while conducting inspections in the Cameron Hills operations area.

Paramount's Comments:

Paramount has no comment on this suggestion.

Suggestion 2

The Review Board suggests the agencies responsible for water resource management and protection increase their monitoring and enforcement efforts commensurate with the increase in the scope of Paramount's development in the Cameron Hills area.

Paramount's Comments:

Paramount suggests that this Suggestion be removed. Paramount has in the past, and will continue in the future, to comply with applicable laws, regulations, conditions and guidelines, as they relate to our operations. Paramount feels that the Suggestion is inappropriate and misleading and implies wrongdoing by Paramount. There is no evidence that any such wrongdoing has taken place.

Suggestion 3

The Review Board suggests that the MVLWB and NEB specify low-impact seismic lines (currently =4.5 m wide average, maximum =5 m wide, maximum line of sight =200 m) as the current standard for geophysical programs in boreal caribou habitat, as outlined in the MVEIRB 2003 draft document: Reference Bulletin – Preliminary Screening of Seismic Operations in the Mackenzie Valley.

Paramount's Comments:

Paramount questions this suggestion for the reasons listed below:

Paramount suggests that the Review Board has not appropriately considered the commitments that Paramount has undertaken with respect to protecting potential caribou habitat, and caribou on the Cameron Hills. Paramount uses low impact seismic approaches with the use of vibroseis techniques, restricting drilling and construction to the winter months, and gating the winter road to preclude non-project traffic. Much of the concern about caribou and disturbance, as it relates to roads and trails, is from the amount of human use these trails are subjected to, and not merely their existence on the landscape.

The Boreal Caribou Committee (BCC 2001) best practices for seismic exploration require 3 m (or less) width LIS lines (using enviro-drill technology) in caribou ranges which may be compromised by incremental linear development (ranges with priority include Chinchaga, ESAR and Red Earth).

In cases, 5.5 m shot lines in areas of severe surface gravels may be required for safe operation of vibroseis programs may be allowed if it can be shown that ground conditions prevent normal drilling and that caribou will not be impacted.

According to the BCC, LIS methods should also:

- minimize line-of-sight down the seismic lines (i.e., meander);
- zero ground disturbance through high blading and use of mulchers to promote fast recovery of vegetation (operation on frozen or dry ground only; remedial work on existing disturbances encouraged);
- timing to avoid late winter and caribou calving periods;

- render lines impassable through the use of rollback, etc. Make rollback intermittent to allow caribou passage.

Paramount suggests that until RWED completes their caribou studies (and collects credible, scientific data), and the Deh Cho Boreal Caribou Working Group has been formed, and has had time to appropriately analyze data and formulate defensible decisions, this Recommendation should be removed.

Suggestion 4

The Review Board suggests that RWED determine the need for cooperative research to document the impacts of the Cameron Hills development on marten, wolf, and wolverine populations.

Paramount's Comments:

Paramount questions this suggestion for the following reasons:

Paramount suggests that the focus of cooperative research on marten, wolf, and wolverine wholly on the Cameron Hills, and by default, on Paramount's activities there, is inappropriate. Rather, Paramount feels that if RWED chooses to pursue cooperative research, that it should have a wider scope.

Suggestion 5

The Review Board suggests that the discussion and drafting of the community investment plan be resumed between the KTFN and Paramount, with a target date of completion and implementation of November 30, 2004.

Paramount's Response:

Paramount's proposal of a community investment plan was previously made on a purely goodwill basis. As such, Paramount will consider the possibility of a community investment plan in conjunction with outcome of a number of other Recommendations found within the report, but otherwise questions the appropriateness of inclusion of this suggestion as there is no legislation requiring community investment plans with the public.

Suggestion 6

The Review Board suggests that Paramount continue discussions with the Hay River Health and Social Services with regards to services (emergency or other) that may be utilized by the company in certain instances.

Paramount's Comments:

Paramount made this commitment through the EA process.

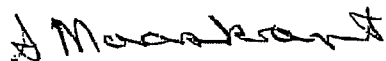
Paramount Resources Ltd. appreciates the opportunity to provide Paramount's perspective on the MVEIRB Report of Environmental Assessment and Reasons for Decision for Paramount Resources Ltd. Cameron Hills Extension Project EA03-005.

Paramount sincerely believes that it has, through extensive research and application of accepted science, made every effort to satisfy the requirements of each of the regulatory agencies. We respect and adhere to current federal and territorial legislation and guidelines. We appreciate the concerns of northerners regarding their culture, communities and environment, and we recognize the value of a mutually beneficial working relationship with the affected communities.

Where there is room for compromise, Paramount has been willing to compromise. However, in cases where Paramount is already meeting all legislation and guidelines, we fail to understand why our Project should be delayed further.

Thank you for your careful consideration of our response to the MVEIRB Report. If we can be of further assistance, please do not hesitate to call Shirley Maaskant, at (403) 290-3619.

Yours truly,



for Lloyd Doyle, Corporate Operating Officer

CC: Chair, NEB
Chair, MVLWB
Minister, INAC
Mr. Hanna, DFO

