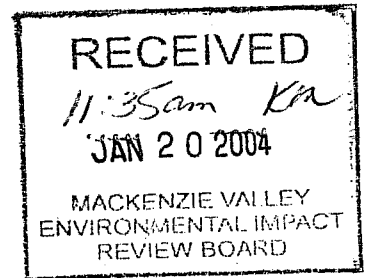


**Information Request Response
Paramount Cameron Hills Extension
Environmental Assessment (EA 03-005)**



IR Number: 1.2.21 and 1.2.39 (IDENTICAL QUESTIONS)
Source: Fort Providence Metis Council and KTFN
To: Government of the Northwest Territories
DAR Section: N/A (previous commitments)
Terms of Reference Section: N/A

Preamble

In its Report of Environmental Assessment on EA01-005, the Review Board made 7 suggestions. Of those 7, 1 (#2) was directed solely at the GNWT concerning compensation for impacts to traditional harvesting.

Request

Please provide the MVEIRB with the following information:

- a) Describe in full what the GNWT has done in response to Suggestion #2.
- b) Provide any reports that were generated as a result.

Response

Please provide the MVEIRB with the following information:

Suggestion #2 "The GNWT should develop a procedure to determine acceptable amounts of compensation that should be provided to trappers and other resource harvesters in the event that developments are proven to have impacted their harvesting activities. If the development of this procedure determines that insufficient data is currently being collected to allow compensation to be calculated, then the GNWT should expand its data collection process to obtain the required data."

Suggestion #2 from the previous MVEIRB requests actions from the Government of the Northwest Territories (GNWT) in regards to compensation to harvesters proven to have had their resource activities impacted. The MVEIRB suggests that two actions are required:

- firstly, in regard to procedure to determine acceptable amounts of compensation, and

- secondly, in regard to the adequacy of data and process to obtain such.

The GNWT recognized that the suggestion of the MVEIRB is an aspect of its ongoing operations. No action has been taken specifically as a result of the suggestion. However that said, actions the GNWT has undertaken that relate to Suggestion #2 include:

1. Discussion of harvest data during consultation on the current development of a new NWT Wildlife Act.

Community members and land claim organizations, along with the GNWT, recognize the need for a comprehensive approach to understanding the amounts of wildlife harvested annually in the NWT. Aspects of this information could act to substantiate compensation claims.

There are two kinds of wildlife harvesting: hunting and trapping. Trapping information is more succinct and easier to collect. Most furs that enter the market are accounted for through commercial reporting. There are some furbearers that are harvested for personal use. Harvesting for hunting is more complex. The GNWT authorizes non-resident hunters who must report their take through the outfitters.

Resident hunters voluntarily participate in an annual harvest survey. There is a requirement to report harvest of selected species under the current Hunting Regulations.

There is currently no requirement for Aboriginal harvesters to report their harvest. In some areas, land claim organizations have carried out short-term wildlife harvest studies, but the vast majority of the Aboriginal harvest is unreported.

Given these multiple avenues to assemble comprehensive information on the harvest of the wildlife in the NWT, the Government of the Northwest Territories is working together with Aboriginal organizations to develop more comprehensive system to compile and manage harvest data.

2. The GNWT is working to ensure that the federal Species at Risk Act is upheld. As well, the GNWT is developing an NWT Species at Risk Act.

Under this Act, harvesting of all species at risk is through authorization only. Therefore, theoretically, records will be complete.

3. RWED continues to work on the development of appropriate legislative and policy instruments to facilitate compensation for harvesters of the NWT impacted by industrial development.

The issue of compensation is complex. Compensable losses relate to lost opportunities. While it is easier to determine the costs of lost opportunities for single animals such a polar bear lost to a single activity such as a sport hunt, it is far more difficult to assess the value of impacted caribou. A team of RWED officials continues to research and discuss this issue and possible policy and legislation actions.

Compensation for losses through impacts from development is an aspect of federal legislation and its associated plans. Actions are generally taken between two parties: the developer; and the individual or Aboriginal organization concerned. RWED continues to look into what the GNWT can do under its mandate to facilitate the compensation of harvesters for resources lost. While research progress has been made, there are no research reports publicly available at this time.

4. As well as investigating compensation and preventive actions for lost wildlife resources, RWED is investigating actions that could facilitate the prevention and compensation for the loss of vegetative resources as well.
5. "Impacted harvesting activities" may result from far more than direct loss of individual animals through a developer's activities. A broader understanding of impacts is being gained through several activities underway. Phase 1 of the NWT Biodiversity Study is developing an annotated list of these initiatives. Information on this initiative is available at:
http://www.nwtwildlife.rwed.gov.nt.ca/Biodiversity/biodiversity_action_plan.htm

As well, a draft text regarding the history of harvesting in the NWT is available at:
<http://www.nwtwildlife.rwed.gov.nt.ca/Biodiversity/Trapping%20Hunting%20and%20fishing%20Perspective%20Box%20v.2.pdf>

In conclusion, multiple actions are being taken to meet the intent of Suggestion #2. Information is made public as appropriate.

**Information Request Response
Paramount Cameron Hills Extension
Environmental Assessment (EA 03-005)**

IR Number: 1.2.22 and 1.2.43 (IDENTICAL QUESTIONS)

Source: Fort Providence Metis Council / KTFN

To: Government of the Northwest Territories

DAR Section: 3.2.1

Terms of Reference Section: C-2

Preamble

Paramount says that the size and volume of the trees that will be cut down, in conjunction with the travel distance may reduce the economic viability of salvaging timber.

Paramount also says that excess timber not rolled-back or used for corduroy will be decked, and the appropriate companies notified of the volume and location.

Request

Please provide the MVEIRB with the following information:

Please provide the MVEIRB with the following information:

- a) Identify what, if any, authorizations Paramount will require from the GNWT to allow it to cut down trees.
- b) Provide the GNWT's analysis on the economic viability of salvaging trees cut down in the Cameron Hills by Paramount.
- c) Identify under what authority Paramount is permitted to use the trees that it cuts down for its own purposes, such as the construction of corduroy roads.
- d) What are the GNWT's requirements for Paramount paying for the right to cut down trees, to salvage merchantable timber, to pay to use trees for its own purposes and to replant the areas that have been cleared?

Response

Question a), c) & d)

There currently are no Forest Management Authorizations required by Paramount to conduct their activities. Paramount may cut down trees to fulfill the

activities authorized under a land use permit (for example, construction of a well pad or a seismic line). Under its land use permit, Paramount can deck any cut timber or roll the timber back. All regulations related to these activities under the Mackenzie Valley Resource Management Act apply.

However, the timber remains under the control of the GNWT. Therefore, Paramount cannot use the timber for any purpose nor could Paramount move the timber harvested off the area authorized in the land use permit. If Paramount wishes to use the timber for any purpose (for example: construction of corduroy for roads or chipping for insulation) a Forest Management Authorization would be required. If this occurs, timber cutting and reforestation dues would be paid to the GNWT.

Question b)

Through the Forest Resources Section of Forest Management Division, digital data for the project footprint is analyzed and an attempt is made to determine the amount of forest vegetation that is affected by the project. Volumes are determined and a cost for that timber based on merchantable standards can be assessed.

**Information Request Response
Paramount Cameron Hills Extension
Environmental Assessment (EA 03-005)**

IR Number: 1.2.41

Source: KTFN

To:
**Indian and Northern Affairs Canada
Government of the Northwest Territories**

Dar Section: 3.2.1

Terms of Reference Section: C-2

Preamble

As the regulators and reviewers of this project, the above organizations have a responsibility to approve Paramount's selected access and pipeline routes.

Request

Please provide the MVEIRB with the following information:

a) Explain the criteria, and criteria weighting, that your organization considers acceptable for use by Paramount in selecting access and pipeline routes.

Response

The GNWT does not have formal criteria or criteria weighting for selecting access or pipeline routes per se. Except for Commissioner's land, the GNWT is afforded an opportunity to review land use permits and to make comments on access or pipeline routes by the Mackenzie Valley Land and Water Board (MV L&WB). The GNWT typically provides comments that are geared to avoiding site specific impacts (for example, avoiding bear dens or critical habitats, protected areas, or avoidance of certain terrain, etc).

Furthermore, for the oil and gas industry, the initial disturbances often occur as seismic operations, some dating back to the 1960s. Depending on terrain constraints, proponents normally request re-use of these seismic lines for winter road access for exploration wells as an impact mitigation measure. This then sets the pattern for subsequent disturbances as a proponent works toward a production phase (i.e. development of production wells, pipelines, access). Depending on the assessment process (e.g. Land and Water Board or National

Energy Board (NEB)), the GNWT may provide comments on preferred route alternatives but these comments are not based on a formal criteria basis. The GNWT is not aware if the Department of Indian and Northern Affairs, the NEB or MV L&B apply criteria or criteria weighting at this last stage beyond what the proponent provides in their applications for their authorizations.

**Information Request Response
Paramount Cameron Hills Extension
Environmental Assessment (EA 03-005)**

IR Number: 1.2.45

Source: KTFN

To: Government of the Northwest Territories
Indian and Northern Affairs Canada
Environment Canada

DAR Section: 3.2.1

Terms of Reference Section: C-2

Preamble

Paramount provides a break-down of the species content of Certified Canada Seed #1.

Paramount says that rutting to a depth of 30 cm will be permitted.

Request / Response

Please provide the MVEIRB with the following information:

- a) Are the species identified indigenous to the project area?

- b) What is your organization's policy on the use of non-indigenous plant species?

The GNWT promotes the use of indigenous species. Recognizing that this is not always possible, the GNWT promotes the exclusion of species recognized as invasive (i.e. hard to control species ... many of which are identified as weed species in agricultural legislation in western provinces). The GNWT recognizes that Canada Select #1 is one means of reducing this potential, however, the use of seed batch analysis in addition to specification of seed quality in order to exclude hard to control species is the preferred means.

- c) Are there any concerns with the species that have been identified?

Paramount Resources Seed Mix

With regards to the Paramount Resources activity in the Cameron Hills, at least two and possibly three different seed mixes (wet sites, mesic sites and possibly dry sites) would likely be required. Fall Rye can be a component on any mix given its tolerance for a wide range of conditions. However, when combined with any other species (i.e., regreen wheat x wheatgrass), the purchase of which is to act as a non-persisting nurse crop, the total percentage in the mix should not exceed 50%.

Mesic Sites

The specific seed mix that Paramount is proposing to use would probably work fine on mesic sites in the Cameron Hills. Some consideration should also be given to including a couple of other commercially available early-mid successional native grass species with different growth habits in the mix (i.e., diversity is also a good thing). These could include spike trisetum (*Trisetum spicatum*), hairy wild rye (*Elymus innovatus*), Rocky Mountain fescue (*Festuca saximontana*), fowl bluegrass (*Poa palustris*) and/or possibly alpine timothy (*Phleum commutatum*) – a species native to the NWT but which may or may not occur in the Cameron Hills.

Wet Sites (Subhydric to Hydric)

In the Cameron Hills, erosion prone sites will probably more often than not be wet sites. A few native grass species are available in commercial quantities that may be more appropriate and effective on wet sites. This would include early-mid successional species like tufted hair grass (*Deschampia cespitosa*), fowl bluegrass (*Poa palustris*) and slough grass (*Beckmannia syzigachne*).

Dry Sites (Subxeric to Submesic)

These sites may not constitute a revegetation or erosion concern in the Cameron Hills. However, if they do some of the commercially available early-mid successional native grass species that could be considered would include hairy wild rye (*Elymus innovatus*), Canada wild rye (*Elymus canadensis*) and fringed brome (*Bromus ciliatus*). A couple of other species potential species could include June grass (*Koeleria macrantha*) and northern wheat grass (*Agropyron dasystachyum*). Although native to northern Alberta, it is uncertain whether or not these last two species occur in the NWT.

Prepared by: Bob Decker, Forest Ecologist, Forest Resources, FMD, Hay River

d) What is your organization's policy on acceptable rutting depth?

In the "Mackenzie Valley Environmental Impact Review Board Report of Environmental Assessment On the Paramount Resources Ltd. Cameron Hills Gathering System and Pipeline Development" release in 2001, the MVEIRB stated that "the GNWT expressed concern regarding Paramount's reference to a rutting depth of 30 cm and submitted that, although some rutting is unavoidable, Paramount should commit to undertaking mitigative action if rutting of any depth occurs during construction" (5.2 Terrain and Soils). The GNWT has not changed its position on this matter.

**Information Request Response
Paramount Cameron Hills Extension
Environmental Assessment (EA 03-005)**

IR Number: 1.2.45

Source: KTFN

To: Government of the Northwest Territories
Indian and Northern Affairs Canada
Environment Canada

DAR Section: 3.2.1

Terms of Reference Section: C-2

Preamble

Paramount provides a break-down of the species content of Certified Canada Seed #1.

Paramount says that rutting to a depth of 30 cm will be permitted.

Request / Response

Please provide the MVEIRB with the following information:

- a) Are the species identified indigenous to the project area?

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**Information Request Response
Paramount Cameron Hills Extension
Environmental Assessment (EA 03-005)**

IR Number: 1.2.50

Source: KTFN

To: Government of the Northwest Territories
Environment Canada

DAR Section: 3.2.11

Terms of Reference Section: C-2

Preamble

Paramount proposes windrow breaks every 400 m of at least 10 m in length to minimize the potential wicking effect during forest fires and to promote wildlife movement.

Request/Response

Please provide the MVEIRB with the following information:

a) Explain whether or not your organization agrees that the proposed windrow break spacing is sufficient to achieve the dual purposes stated by Paramount.

No.

b) If no, then what does your organization believe is the minimum acceptable spacing for windrow breaks.

Forest Management requests a maximum of 100 metres with a 10 metre break.

c) Provide the rationale for your proposed spacing.

To reduce the effect of fire wicking and insect transmission.

**Information Request Response
Paramount Cameron Hills Extension
Environmental Assessment (EA 03-005)**

IR Number: 1.2.56

Source: KTFN

To: Indian and Northern Affairs Canada
Government of the Northwest Territories

DAR Section: 6.2

Terms of Reference Section: F-2

Preamble

Paramount has encountered significant erosion problems. None of the MVLWB, NEB, INAC or the GNWT ensured that the Ka'a'Gee Tu First Nation had been informed of these problems and involved in discussions on how to repair and avoid these problems.

Request

Please provide the MVEIRB with the following information:

a) Explain why your organization did not consult with, or ensure that Paramount consulted with, the KTFN on the erosion problems encountered by Paramount. If the position taken is that your organization is not the organization responsible for informing the KTFN of environmental problems, then please identify the organization that is responsible for doing so.

Response

The Department of Indian and Northern Affairs issues leases on federal crown land. The Mackenzie Valley Land and Water Board (MVL&WB) issues land use permits and water licences in the Cameron Hills and, through Land Use Inspectors employed by the Department of Indian and Northern Affairs, manages problem situations as they arise.

The GNWT, while concerned about land use and activities that occur, does not have a mandate or authority on federal crown land. The Mackenzie Valley Land and Water Board recognizes the interest of other parties and the GNWT receives a copy of reports filed by Paramount as courtesy.

**Information Request Response
Paramount Cameron Hills Extension
Environmental Assessment (EA 03-005)**

IR Number: 1.2.90
Source: KTFN
To: Government of the Northwest Territories
DAR Section: 7.9.2.6
Terms of Reference Section: G-7

Preamble

In Section 7.9.2.6, Paramount describes how it developed its heritage resource potential map, including the use of a list of criteria for selecting higher probability locations for resource discoveries.

Request

Please provide the MVEIRB with the following information:

Please note that our comments are restricted to archaeological resources.

a) Review and comment on Paramount's methodology.

Paramount has attempted to model archaeological potential based on available heritage and terrain data. Though a common technique in other jurisdictions, archaeological predictive modeling has not been widely used in the NWT, due largely to the lack of baseline data. Indeed, only a single archaeological inspection (Andrew Mason NWT 2000-901) has been carried out in the Cameron Hills area, and there is also very little, if any, published data available on traditional land use in the area. (Traditional land use can help inform on the more recent archaeological record.) The archaeological inspection (conducted on behalf of the proponent) which, to the best of our knowledge covered only a small fraction of the SDL in any detail, failed to record any known archaeological sites. Detailed terrain data is also lacking in the NWT, though the proponent may have access to proprietary data for the SDL. Generally, models of this nature should be viewed with care and should not be accepted as direct evidence until adequate ground-truthing has been conducted to assess the model's accuracy.

b) Are the criteria that were used appropriate?

Given the extent of available baseline data the proponent's criteria were appropriate, though the value of modeling with available data remains questionable.

c) Are there other criteria that should have been applied?

The fact that the area is still actively trapped suggests that distribution of fur-bearing species, location of traplines and trails may have provided further refinement to the model.

d) Any other comments about Paramount's heritage resource investigation methodology or conclusions?

The topographic prominence of the feature (Cameron Hills) suggests that it may have been used for a variety of uses in the past, including defense, trapping, moose hunting, and others. Consequently it is reasonable to assume that archaeological resources exist within the development area. Given that development has extended beyond the bounds of the 2000 archaeological impact assessment undertaken by the proponent it is reasonable to expect that unrecorded archaeological sites may exist within the new development areas.

An effective mitigation technique would be to prescribe a follow-up effects monitoring program. However, if further expansion is contemplated in the future the proponent should be directed to undertake an archaeological impact assessment focused on these areas. With proper planning it would be feasible to conduct both a follow-up effects monitoring program covering projects areas already under review, in combination with an archaeological assessment of future development areas.

Prepared by: Prince of Wales Northern Heritage Centre
Education, Culture and Employment
Government of the Northwest Territories
January 19, 2004

**Information Request Response
Paramount Cameron Hills Extension
Environmental Assessment (EA 03-005)**

IR Number: 1.2.95
Source: KTFN
To: Government of the Northwest Territories
DAR Section: 7.10.2 and 7.10.5.1.1
Terms of Reference Section: G-8

Preamble

Paramount attributes some statements to several GNWT employees. Al Hymers told Paramount that harvesting and trapping records for the Cameron Hills are not available. Al Helmer said that there is very little hunting activity in the Cameron Hills. Similarly, Deb Johnson said that most of the caribou hunting in the region is well outside of the SDL, occurring mainly west of Kakisa Lake.

Request

Please provide the MVEIRB with the following information:

- a) Provide evidence that supports the statements made by Al Helmer and Deb Johnson, given that there are no harvesting and trapping records available upon which to base or dispute those statements.

GNWT Response

Preamble

We assume that Al Hymers, RWED pers. comm. 2003 p295) and Al Helmer (Renewable Resource Officer, RWED, Hay River, pers. comm. 2003) are the same individual. Al Helmer has been a resource officer for the past 30 years and has extensive personal knowledge of the Cameron Hills and South Slave region. Deb Johnson, South Slave Regional Biologist, has several years experience and is currently conducting studies of boreal caribou in the South Slave.

Wildlife Harvest

The GNWT does not collect information on hunting activity in the NWT unless a reporting requirement is identified in the *Northwest Territories Hunting Regulations* for a given species. There is currently no requirement to report the

harvest of boreal caribou in the NWT, and consequently, there is no written report of hunting activity in the SDL.

Therefore, GNWT biologists and resource officers, staff that have a responsibility to manage the wildlife resource in the NWT, rely on becoming knowledgeable about hunting activities in the areas they work in through a variety of means. This includes observations made during field work and air and ground patrols, file reports and publications, information from colleagues, and discussions with community members regarding their experience and local observations of wildlife populations and hunter activity. Other observations come from a variety of sources including industry personnel, pilots, tourists and others. Some reports, such as that by Gunn et al (Draft) combine scientific knowledge with the traditional knowledge of community members in the South Slave and Deh Cho regions. While GNWT resource officers and biologists regularly travel throughout the Slave Lake Region, certain areas are visited more frequently. The amount of travel within the Significant Discovery Licence (SDL) within the Cameron Hills area varies.

Staff also make inferences based on access availability, habitat availability, and common habits of hunters. Discussions with community members indicates that moose are the most heavily harvested species in the South Slave region of the NWT, partly due to the low density and secretive nature of boreal caribou. Therefore, based on professional judgement, GNWT staff believe that few people specifically hunt boreal caribou, rather caribou are harvested by chance when people are out on the land hunting moose or on their trap lines. Additionally, it is most probable that people who are harvesting boreal caribou would frequent areas that are closer to the communities than the Cameron Hills and are more easily accessed due to the low success level.

It is a reasonable statement that there is little hunting activity in the SDL based on a number of points including:

- the fact that most people harvest moose and that the productive areas for moose occur outside of the SDL,
- the low number of people that specifically hunt caribou,
- the difficulty in accessing the SDL,
- the lack of people seen when travelling in the SDL over the years, and
- the observation that boreal caribou hunting would occur in areas that are more easily accessed by the community members of Kakisa and Hay River.

Fur Harvest

The GNWT operates a Fur Advance Program to assist the fur industry. This program means that trappers bring their fur to a GNWT office and receive an advance for their fur. The GNWT ships the fur to a Canadian fur auction house. The GNWT manages an administrative system to track the fur and payments.

While not intended as a fur harvest record, the system does keep records of furs that are received from local trappers. Northern trappers also have the option of selling their furs to a licensed Fur Dealer in the NWT, keeping the fur for clothing or craft making, or shipping their furs directly to an auction house. Fur dealers must provide their records to the GNWT.

Trapping areas are tied to family groups, which have been passed down through the generations. There are no registered trappers in the SDL but there are two trappers with traplines that cover the larger area of the Cameron Hills including the SDL. Although the administrative fur advance system could be queried to determine whether there may have been trapping activity by a particular individual, there is no site specific information to identify the specific area of that individual's trapline was involved or the specific time of trapping. However, as Renewable Resource Officers are responsible for grading and shipping all fur under the Fur Advance Program, they tend to know the approximate amount of fur bought in by a trapper or they can query the database. This allows them to make an informed statement regarding the approximate level of trapping activity by an individual. However, GNWT staff are required to respect the privacy legislation and an officer would not provide information on individuals. Any information released would normally be at the regional level by species only.

Interviewing Staff

It should be noted by reviewers of documents that GNWT staff are often "interviewed" by proponents. However, the context of the original questions and the eventual use of the "quotes" may have decidedly different contexts. Proponents do not normally inform GNWT staff that their comments will be quoted in documents nor are they provided an opportunity to review these "quotes" to ensure an accurate message is published. For example, an officer asked about existence of fur harvest data would indicate that it is "not available" but would mean that it is "not available for public distribution". Further questions could have revealed that an accounting system does track fur that is sold to auction houses through the fur advance program but that privacy legislation restricts release of data other than as generalized information.

Similarly, unless a proponent discusses more specifically the areas patrolled, locations of studies, access and time of year of access, etc. even generalized information can be misleading. Without providing a context for the eventual use of the information, the resulting quote can be inappropriate, misleading or inaccurate. Proponents are always encouraged to use multiple sources and, in particular, to consult with persons in local communities.

It should also be remembered that proponents may quote from "earlier documents" without citing that document nor indicate that the interview did not pertain to the current project (for example Tom Chowns 2000 is used elsewhere in the document). This increases the likelihood that new departmental

information or policy is not included and that the context of the quotes are not valid. In some circumstances, the staff no longer work for the GNWT and it is not possible to validate the quote and the understanding of the person interviewed.

Prepared by: Deborah Johnson, Regional Biologist
January 19, 2004

**Information Request Response
Paramount Cameron Hills Extension
Environmental Assessment (EA 03-005)**

IR Number: 1.2.129

Source: MVEIRB

To: GNWT
INAC
EC

DAR Section: 7.2

Terms of Reference Section: G-2

Preamble

Policy related to air quality applicable in the development area (and the Mackenzie Valley in general) includes Air Quality Standards set out under the territorial Environmental Protection Act. The environmental management of impacts often requires effective monitoring, inspection and enforcement. It is unclear how this is presently done with respect to air.

Request/ Response

Please provide the MVEIRB with the following information:

- a. Specify what binding legal air quality guidelines or standards you(r) organization is responsible for.**

The Department of Resources, Wildlife and Economic Development (RWED) has adopted the Guideline for Ambient Air Quality Standards in the NWT pursuant to the Environmental Protection Act subsection 2.2(c). The Guideline establishes ambient air quality standards for sulphur dioxide, ground-level ozone, total suspended particulate and fine particulate matter (PM_{2.5}). These standards are applied as long-term management goals for air quality over the entire Northwest Territories. In the absence of NWT standards for specific pollutants (e.g. nitrogen dioxide), the appropriate National Ambient Air Quality Objectives (NAAQO) are used.

The Guideline is applied to RWED's assessment of the acceptability of ambient air quality and emissions from proposed and existing developments. RWED air specialists review reports, assessments, and related documents and provide comments and suggestions to the appropriate regulatory authority – i.e. those responsible for the issuance of permits, licences or other authorizations.

The Guideline is also used for the reporting of air quality in the NWT.

Further, RWED is developing a Code of Practice for the Upstream Oil and Gas Industry. This Code of Practice will provide guidance, similar to that evolving in other jurisdictions, to the oil and gas industry with respect to best management practices in such areas as emissions quality, monitoring and reporting, and pollution control technology. Once completed, the Code of Practice will be forwarded for adoption by the Minister of RWED pursuant to Environmental Protection Act

subsection 2.2(c). It is envisioned that, once adopted, the Code of Practice will be applied in a similar manner to the Guideline for Ambient Air Quality Standards.

The Guideline for Ambient Air Quality Standards and the draft Code of Practice are not legally binding instruments.

The GNWT, along with the federal government and governments of the other provinces and territories (except Quebec), is a signatory to the Canada-wide Standard (CWS) sub-agreement of the Canada-wide Accord on Environmental Harmonization. CWS's relating to air quality have been endorsed by federal, provincial and territorial Ministers under the sub-agreement, most notably the CWS's for particulate matter and ozone. While compliance with the CWS's for particulate matter and ozone is not required until 2010, the GNWT adopted the numeric CWS values as part of the NWT Ambient Air Standards in December 2002. Similarly, the Code of Practice will incorporate commitments made under the CWS for benzene related to oil and gas facility emissions from sources such as glycol dehydrators and storage tanks.

- b. Specify if regular compliance inspections for air quality are conducted by your organization to ensure that developments in operation are meeting those standards. If your organization does not conduct such inspections, please specify who currently is responsible for doing so.**

RWED monitors ambient air quality from community-based air quality monitoring stations operating in Fort Liard, Norman Wells, Inuvik and Yellowknife. Results are reported to the public annually.

The majority of industrial development activity in the NWT occurs on federal land. RWED does not conduct inspections to ensure compliance with territorial (or federal) air quality standards (or objectives) related to development activities on federal land. There is an expectation that the appropriate regulatory authorities - i.e. those responsible for the issuance of permits and licences or other authorizations - will conduct such inspections. It is noted that the two main "permitting" agencies - the National Energy Board and the Mackenzie Valley Land and Water Board - are absent from the recipient list for this IR.

- c. Specify if your organization is responsible for air quality enforcement, and, if so, exactly how it is currently done. Provide examples.**

As stated above, RWED does not conduct compliance inspections or enforcement activities related to air quality on federal land.

RWED will re-examine its role in air quality management, compliance inspections and enforcement activities on federal land following the devolution of land and water, and minerals, oil and gas management responsibilities from the Government of Canada.

Prepared by: Graham Veale
January 19, 2004

BDY.TXT

Hi Kimberley

Please find attached the responses to the IRs addressed to the GNWT. Please note that IR 1.2.61 is not yet included but will be forwarded as soon as possible. These are sent as separate word files to allow the Review Board to insert them in the appropriate order. Please note that four IRs were composed of two duplicate questions. These have been amalgamated into two responses and the appropriate duplicate IR #s provided to eliminate confusion.

The GNWT has received a binder of responses from Paramount. This is appreciated and will help store the hard copies once received from all parties. To facilitate circulation to my internal contacts, it would be helpful to receive an electronic version as well.

Gavin More
Manager, EA - GNWT