



June 8, 2015

Mr. Simon Toogood
Environmental Assessment Officer
Mackenzie Valley Environmental Impact Review Board
PO Box 938
YELLOWKNIFE NT X1A 2P1
VIA EMAIL

Dear Mr. Toogood;

Husky Chedabucto Mineral Exploration Project Environmental Assessment (EA 1415-01) – GNWT Intervention

Please find attached the Government of the Northwest Territories' (GNWT's) intervention for the Husky Chedabucto Mineral Exploration Project environmental assessment. The GNWT will present its position at the June 23 - 24, 2015 public hearing in Yellowknife. The GNWT will also attend the June 18, 2015 community hearing in Behchokò.

Should MVEIRB or any of the EA participants have any questions, please contact Lorraine Seale, Manager, Project Assessment Branch (Lorraine_seale@gov.nt.ca) or Charlotte Henry, Project Assessment Analyst (charlotte_henry@gov.nt.ca).

The GNWT looks forward to participating in the June 18 and June 23 - 24 hearings.

Sincerely,

Terry Hall
Director, Land Use and Sustainability



**GOVERNMENT OF THE NORTHWEST TERRITORIES
INTERVENTION**

FOR

**HUSKY OIL OPERATIONS LIMITED'S
CHEDABUCTO MINERAL EXPLORATION PROJECT
EA1415-02**

Submitted to:

Mackenzie Valley Environmental Impact Review Board

200 Scotia Centre
Box 938, 5102-50th Ave
Yellowknife, NT X1A 2N7

June 8, 2015

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LIST OF ACRONYMS

AANDC	Aboriginal Affairs and Northern Development Canada
AIA	Archaeological Impact Assessment
EA	Environmental Assessment
EC	Environment Canada
ENR	Environment and Natural Resources
GNWT	Government of the Northwest Territories
IRs	Information Requests
MVEIRB	Mackenzie Valley Environmental Impact Review Board
MVRMA	Mackenzie Valley Resource Management Act
PAS	Protected Areas Strategy
PR	Public Registry
PWNHC	Prince of Wales Northern Heritage Centre
SOPs	Standard Operating Procedures
TG	Tłıchǫ Government
WLWB	Wek'èezhii Land and Water Board
YKDFN	Yellowknives Dene First Nation

1. INTRODUCTION

This intervention summarizes the Government of the Northwest Territories' (GNWT's) participation in and conclusions with respect to the environmental assessment of Husky Oil Operations Limited's proposed Chedabucto Mineral Exploration Project (MVEIRB EA 1415-02). This submission takes into consideration all of the documents posted to the Mackenzie Valley Environmental Impact Review Board (MVEIRB) public registry as of 5 pm June 5, 2015.

This intervention makes the following recommendation for MVEIRB's consideration:

RECOMMENDATION:

In the interest of a fair and efficient process, GNWT recommends that, before the hearings, MVEIRB compile and post on the public registry for intervenor review and comment a draft list of all developer commitments made during the preliminary screening and environmental assessment (EA). GNWT further recommends that MVEIRB set deadlines for comments and MVEIRB review of this list such that intervenors and the developer are able to make their final submissions based on a complete and final list of developer commitments.

GNWT is satisfied that, if all developer commitments and standard legislative and regulatory tools and practices are implemented, the development is unlikely to result in significant adverse impacts to components of the environment within GNWT jurisdiction. Accordingly, the GNWT is not requesting that MVEIRB recommend any measures.

The GNWT appreciates the opportunity to express its views and provide recommendations to the Review Board for this EA. Representatives from the GNWT will attend the hearings in Behchokò on June 18, 2015 and in Yellowknife on June 23 - 24, 2015 in order to assist the Review Board in making its significance determination for the proposed development.

2. GNWT MANDATE AND EA PARTICIPATION

As set out in the Land Use and Sustainability Framework, the GNWT is committed to making balanced land management decisions in the context of sound environmental stewardship, with consideration of ecological, social, cultural and economic values to ensure maximum benefits to current and future generations.

GNWT's participation in this environmental assessment to date has included:

- Reviewing and commenting on Husky's Type "A" Land Use Permit application (W2014Q0005) and the Wek'èzhìi Land and Water Board's (WLWB's) draft land use permit¹ (January 2015);
- Identifying the participation and status of GNWT departments in the EA (March 25, 2015);
- Meeting with the developer, at the developer's request² (March 31, 2015);
- Writing to Aboriginal Groups and Organizations to encourage their participation in the EA, particularly with respect to submitting evidence related to potential negative effects of the development on asserted or established Aboriginal and/or Treaty rights (April 7, 2015);
- Commenting on the proposed scoping document (April 10, 2015);
- Submitting and responding to Information Requests (IRs), including meeting with Yellowknives Dene First Nation (YKDFN) to clarify IRs (April and May 2015);
- Providing relevant documents to MVEIRB for filing on the public registry; and
- Reviewing all submissions to the WLWB and MVEIRB public registries.

GNWT representatives will participate in the remainder of the EA.

Because the proposed development is located partially on federal land (Wrigley Point), Canada's March 27, 2014 delegation of certain *Mackenzie Valley Resource Management Act* (MVRMA) authorities under the Devolution Final Agreement to the GNWT Minister of Lands does not apply. For this particular EA, it is GNWT's understanding that the Minister of Aboriginal Affairs and Northern Development Canada (AANDC) retains the authority to:

- receive and distribute the Report of Environmental Assessment under MVRMA paragraph 128(2)(a),
- participate in and distribute decisions made under paragraphs 130(1)(a) and (b) and subsections 130(3), 130(4) and 130(4.01), and
- extend time limits under subsections 128(2.2) and 130(4.03).

The Ministers of relevant GNWT departments will participate in the MVRMA section 130 EA decision process as Responsible Ministers.

GNWT will work closely with Canada to ensure that the Crown's duty to consult Aboriginal peoples and, where applicable, accommodate potential negative effects of the development on asserted or established Aboriginal and/or Treaty rights are met.

¹ See MVEIRB Public Registry (PR) Item 10 for reviewers' comments and the developer's responses.

² Meeting notes are posted to the public registry (Item 31).

3. TECHNICAL ANALYSIS

3.1. Overview

Husky is proposing to conduct a two phase exploration program to evaluate a high-quality silica deposit in the Whitebeach Point area. During the land use permit application review and preliminary screening phase in January 2015, GNWT departments provided comments related to land use permit conditions, access considerations, existing land interests in the area, land use planning, the Dinàgà Wek'èhodì Candidate Protected Area, archaeological site protection, timing of proposed activities, public health, waste management, spill contingency planning, and impacts to species at risk and other wildlife. Husky addressed most of these concerns to GNWT's satisfaction in its responses to reviewers' comments on January 28, 2015³. Concerns that GNWT carried forward into the EA are discussed below.

MVEIRB issued a draft scoping document in March 2015 setting out the scope of development and the scope of assessment. In its April 10, 2015 comments on this document, GNWT supported MVEIRB's proposal to exclude from the scope of assessment large scale silica extraction and the potential use of extracted silica in hydraulic fracturing operations.

GNWT notes that intervenors have raised a variety of issues during the process. Based on its review of the evidence filed to date, GNWT has not identified any potential adverse environmental impacts of the development within its jurisdiction that cannot be addressed through the use of standard legislative and regulatory tools and practices. Accordingly, GNWT is not requesting that MVEIRB recommend any measures in relation to the proposed development.

In many MVEIRB EAs, guideline documents are incorporated into an EA by reference in an appendix to the Terms of Reference. Since MVEIRB used the Final Scoping Document and Information Requests (IRs) to the developer instead of a Terms of Reference for this EA, GNWT has ensured that relevant guidance documents are available on the MVEIRB public registry:

- Sample Site Map [attached to comments on land use permit application – PR Item #10]
- Wildlife Sightings Log [PR Item #10]
- Low Flying Aircraft – Brochure [PR Item #10]
- Bear Occurrence Procedures Manual [PR Item #10]
- Camp Waste and Wildlife Attraction Manual [PR Item #10]
- Draft Wildlife and Wildlife Habitat Protection Plan and Wildlife Effects Monitoring Program Guidelines [attached to IR #1]
- Guidelines for Developers for the Protection of Archaeological Sites in the NWT [PR Item #66]
- Northern Land Use Guidelines: Access: Roads and Trails [PR Item #(Not Assigned)]

³ See Annex A for GNWT comments and developer responses and commitments during the preliminary screening and EA to date.

- Guidelines for Safe Ice Construction 2015 [PR Item #(Not Assigned)]
- Forest Fire Prevention and Suppression Guidelines for Industrial Activities (2001) [PR Item #(Not Assigned)]

GNWT understands that in reaching a conclusion under MVRMA s. 128, MVEIRB will consider all commitments made by Husky during the environmental impact assessment process to date, and that MVEIRB will specify in its Report of Environmental Assessment the commitments upon which its findings depend. Annex A provides a list of GNWT comments and developer responses and commitments to date.

RECOMMENDATION:

In the interest of a fair and efficient process, GNWT recommends that, before the hearings, MVEIRB compile and post on the public registry for intervenor review and comment a draft list of all developer commitments made during the preliminary screening and environmental assessment. GNWT further recommends that MVEIRB set deadlines for comments and MVEIRB review of this list such that intervenors and the developer are able to make their final submissions based on a complete and final list of developer commitments.

3.2. Archaeological Resources

MVEIRB granted GNWT's April 10, 2015 request to include potential impacts to archaeological sites as a line item in the scope of assessment. In May 2015, GNWT answered IRs from YKDFN concerning archaeological site protection and received and reviewed the final report for the archaeological impact assessment (AIA) completed for the Husky Chedabucto Project (NWT Archaeology Permit 2014-010).

The scope of the AIA included Husky's first set of proposed drill holes (n=100), and resulted in the documentation of 18 archaeological sites; 7 previously recorded archaeological sites were also revisited during the AIA. Based on these results, Husky has deleted 9 drill holes to avoid impacts to archaeological sites. Given the high density of archaeological sites in the development area, it is very important that pre-disturbance AIAs are done in advance of the additional land disturbing activities listed in the Scope of Development section in the EA scoping document. Husky committed to this course of action in its response to GNWT's comments on the land use permit application.

Condition 43 of the WLWB's draft land use permit W2014Q005 establishes a 150 metre buffer for archaeological sites. The PWNHC's comments on this draft permit recommended that archaeological sites KcPj-6 and KcPj-7 be listed as exceptions to this condition due to their closer proximity to the existing road route. Based on the information in the final report for the AIA of the project, GNWT would provide advice to the WLWB during the regulatory phase concerning revisions to this list. KcPj-7 was revisited during the AIA and its revised boundary intersects the existing winter access road. Impacts to this site must be re-assessed once the routes for the winter access trails required for Phase 2 of the project are determined. Archaeological sites KcPj-6 (ca. 35 m from the existing winter access), KcPj-25 (ca. 45 m from a drill hole), and KcPj-26 (ca. 55 m from a drill hole) will also require exceptions to draft condition 43.

These sites will be avoided if the existing access route is not altered and the drill holes are not moved.

CONCLUSION:

GNWT has reviewed Husky's commitments and the draft land use permit and is satisfied that, if all developer commitments and standard regulatory tools and practices are implemented, the development is unlikely to result in significant adverse impacts to archaeological resources.

3.3. Wildlife

The developer submitted a Wildlife, Archeological and Environmental Awareness Plan as part of the land use permit application. During the IR phase, the GNWT filed the draft Wildlife and Wildlife Habitat Protection Plan and Wildlife Effects Monitoring Program Guidelines and requested that the developer strengthen its Awareness Plan by incorporating information from these draft guidelines. The GNWT also asked the developer to incorporate Standard Operating Procedures (SOPs) into its Plan, to provide onsite mitigation and monitoring instructions for field staff and outline roles and responsibilities of the wildlife monitor.

GNWT also answered IRs from the YKDFN and the Tłı̨chǫ Government (TG) with respect to potential impacts on wildlife. After reviewing the GNWT's response to IR #7, Round 1, the YKDFN requested that GNWT provide any available reports from the moose jaw collection study. GNWT ENR biologists advise that as of June 5, 2015, no such reports are available.

The GNWT is pleased that the developer has committed to address GNWT's requests by submitting a revised Wildlife Awareness Plan prior to commencement of operations (Husky's letter posted to the public registry on May 29, 2015). The GNWT confirms that there are no outstanding issues related to wildlife, which includes species at risk, at this time.

CONCLUSION:

GNWT is satisfied that, if all developer commitments and standard regulatory tools and practices are implemented, the development is unlikely to result in significant adverse impacts to wildlife.

3.4. Conservation Planning

During the preliminary screening and EA, the developer and several intervenors, including the GNWT⁴, provided comments related to the Dinàgà Wek'èhodì candidate protected area.

⁴ For GNWT comments, see January 21, 2015 comments on land use permit application, minutes of March 31, 2015 meeting with the developer, April 10, 2015 comments on draft scoping document, and May 27, 2015 response to TG IR #1.

The Dinàgà Wek'èhodì candidate protected area was formally delineated in April 2010, after Environment Canada (EC) agreed to act as a sponsoring agency at the request of the Tl'ichô Government (TG). As a means to ensure temporary protection of the area, EC submitted an interim land withdrawal application to AANDC in September 2011. In September 2013, AANDC granted the Order-in-Council that forms the interim protection of this area. In December 2011, during the federal processing of the interim land withdrawal application, AANDC issued the Husky and Aurora Geoscience mineral claims. Some of these mineral claims overlap with the Dinàgà Wek'èhodì candidate protected area. On April 1, 2014, as part of Devolution, the GNWT mirrored and assumed administration of this interim land withdrawal and also assumed administration of the mineral claims.

The current Order-in-Council includes a land description that encompasses the total 593 km² of the original Dinàgà Wek'èhodì candidate protected area, while recognizing pre-existing land and mineral tenure, including existing mineral claims held by Husky.

As noted in GNWT's January 21, 2015 comments on the developer's land use permit application, the TG and relevant planning partners, including the YKDFN, the North Slave Métis Alliance, the Northwest Territory Métis Nation, the Community Government of Behchokò and the Wek'èezhii Renewable Resources Board, are currently engaged in a conservation planning process which has generated a significant amount of information on the ecological, cultural, social and economic values of Dinàgà Wek'èhodì. This process is guided by the principles of the NWT Protected Areas Strategy (PAS), which recognize the need to honour existing third party rights and ensure that areas recommended for permanent protection avoid areas of high economic value. As noted in GNWT's May 27, 2015 response to TG IR#1, this process is not yet complete.

GNWT has no further evidence to provide on this matter at this time.

3.5. Land Use Planning

In its January 21, 2015 comments on the developer's land use permit application and its response to TG IR#3, GNWT advised that the Department of Lands had initiated a land use plan scoping study for the Wek'èezhii Management Area. As of June 5, 2015, GNWT advises that it is actively working on this initiative with the TG and other partners, and that no reports are yet available. GNWT is committed to promoting and supporting effective land-use planning in all regions in the NWT, which appropriately respects asserted or established Aboriginal and/or Treaty rights as well as third-party land interests and legal rights.

4. CONCLUSION

GNWT has reviewed all the evidence filed during the preliminary screening and environmental assessment and is satisfied that, if all developer commitments are implemented, the development is unlikely to result in significant adverse impacts to components of the environment within GNWT jurisdiction.

REFERENCES

Government of the Northwest Territories. 2001. Forest Fire Prevention and Suppression Guidelines for Industrial Activities.

Government of the Northwest Territories. 2007. Brochure: Flying Low? Think again...

Government of the Northwest Territories. 2014. Northern Lands Northern Leadership - The GNWT Land Use and Sustainability Framework.

Government of the Northwest Territories. 2014. Bear Occurrence Procedures Manual.

Government of the Northwest Territories. 2014. Camp Waste & Wildlife Attraction Manual.

Government of the Northwest Territories. 2014. Map of Existing Winter Road Route from Highway #3 to Whitebeach Point.

Government of the Northwest Territories. 2014. Wildlife Sightings Log.

Government of the Northwest Territories. 2014. DRAFT Wildlife & Wildlife Habitat Protection Plan and Wildlife Effects Monitoring Program Guidelines.

Government of the Northwest Territories. 2015. Prince of Wales Northern Heritage Centre's Guidelines for Developers for the Protection of Archaeological Sites in the Northwest Territories.

Government of the Northwest Territories. 2015. Northern Land Use Guidelines, Access: Roads and Trails.

Government of the Northwest Territories. 2015. Guidelines for Safe Ice Construction.

ANNEX A: GNWT Recommendations and Husky's Responses and Commitments to Date

	Stage	GNWT Recommendation	Husky's Response
1.	Land Use Permit Application Review, January 21, 2015	GNWT recommends that the proponent submit the required spatial data for the previously unrecorded archaeological sites and high potential landforms recorded during the 2014 AIA to the PWNHC at least 30 days in advance of exploration activities. The PWNHC will provide site-specific management recommendations based on these data.	January 28, 2015: Husky will submit the required spatial data for the previously unrecorded archaeological sites recorded during the 2014 AIA to the PWNHC at least 30 days in advance of exploration activities.
2.	Land Use Permit Application Review, January 21, 2015	The PWNHC recommends that the Board require AIAs of any areas of the project footprint that will extend beyond the areas assessed in the 2014 AIA.	January 28, 2015: Acknowledged. Husky recognized that no more than 100 holes could realistically be drilled in the March-April timeline and therefore conducted an AIA of those first 100 holes. Upon the results of this winter's drilling, Husky will determine if additional holes, up to a total of 200, are required and will conduct AIA's prior to drilling.
3.	Land Use Permit Application Review, January 21, 2015	The PWNHC recommends that the Board list archaeological sites KcPj-6 and KcPj-7 as exceptions to Condition 43 of the Draft Land Use Permit.	January 28, 2015: Acknowledged.
4.	Land Use Permit Application Review, January 21, 2015	Waste disposal: GNWT notes that the City of Yellowknife's, Director, PW&S, noted "We can accept wastes generated from the site provided they are not contaminated. They will also be charged the non-resident tipping fees as the site is outside the City of Yellowknife." It is GNWT's understanding that the City would subcontract the remediation work of all contaminated materials.	January 28, 2015: Acknowledged
5.	Land Use Permit Application Review, January 21, 2015	In the absence of an approved land use plan, GNWT encourages the proponent to continue engaging with Aboriginal organizations and other land use stakeholders on important values within the study area. This will ensure that traditional and local knowledge with regard to land use and places of recreational, economic, scenic, cultural, historical, and ecological values are incorporated into operational plans for the site.	January 28, 2015: Agreed. Husky will continue to engage with the designated Aboriginal organizations to consult on the details of any proposed post-2015 activity well in advance of conducting field operations. Meaningful discussion and engagement will be a critical part of the planning process for any post- 2015 field operations.
6.	Land Use Permit Application Review,	Permission will be required from Department of Transportation, GNWT, to utilize Quarry Reserve	January 28, 2015: Acknowledged. February 6, 2015 – follow up email from Husky indicating

	January 21, 2015	085J06001 for a camp. The proponent is to contact the Department of Transportation Highways Division prior to beginning operations in order to receive authorization to access the highway. DOT will issue a highway access permit once this condition has been satisfied. For more information please contact Del Miller, Regional Manager, Highway Operations, North Slave at 867-920-3432 or del_miller@gov.nt.ca; or Darin Murphy, Regional Manager, Highway Operations, South Slave at 867-874-5008 or darin_murphy@gov.nt.ca.	that they had met with DOT and DOT had no concerns with Husky using the quarry or the access trail behind the sand yard February 10, 2015 – letter from DOT to Aurora Geosciences confirming that DOT does not have concerns with the proposed use of the quarry, and confirming that Husky is responsible for maintaining the environmental stewardship for this access.
7.	Land Use Permit Application Review, January 21, 2015	Targeted time for the phase 1 exploration activity is March to April 2015. Specifications could be made to ensure activity does not extend into May to avoid interference with staging waterfowl or calving moose. The coastal area of Whitebeach Point should be avoided if exploration work is to take place when open water exists.	January 28, 2015: Husky confirms that the winter field work will be completed by April 30th.
8.	Land Use Permit Application Review, January 21, 2015	It would be advantageous to have more detail on the extent and timing of phase 2 activities such as required new cut lines, referenced on page 12 of the application, in order to assess potential impacts and ensure minimal disturbance to wildlife, waterfowl and associated habitat.	The results of the 2015 winter drilling program will be used to determine if mini bulk samples are needed. Should over land access be required for Phase 2 (mini-bulk sampling), a rubber tracked vehicle with a sloop or sled will be employed to access program area from Highway 3 along the existing winter access trail to the existing DOT quarry and on snow covered trails from the quarry to the sampling sites. Post-2015, Phase 2 would take place in the "March-April" time period and would involve the minimal clearing of trails approximately 4 metres wide. Trails will be scouted on foot or snowmobile to minimize forested areas so that slashing can be kept to a minimum and large stands of trees will be avoided. No water will be required for building the winter access. The lake crossing will not require any flooding. Given that this work would take place during the winter, there will be no disturbance to waterfowl and minimal impact on wildlife and habitat. By using a tracked snow cat vehicle, the trails will not be traversible by any wheeled vehicle.
9.	Land Use Permit Application Review, January 21, 2015	The Permittee shall use food handling as well as garbage collection, transfer, storage and disposal procedures that minimize the attraction of wildlife to the camp or drilling areas.	January 28, 2015: Confirmed.

10.	Land Use Permit Application Review, January 21, 2015	The Permittee shall keep all waste, recyclables and debris in a central area within sealed animal proof metal containers until final disposal. (Proposed change to WLWB's DRAFT LUP #40)	January 28, 2015: Husky confirms that all waste, recyclables and debris will be stored in animal proof metal containers and will be removed site and backhauled on flights for proper disposal in Yellowknife.
11.	Land Use Permit Application Review, January 21, 2015	The Permittee shall ensure that the sealed animal proof metal containers are cleaned once emptied.	January 28, 2015: Confirmed.
12.	Land Use Permit Application Review, January 21, 2015	The Permittee shall remove all noncombustible and recyclable garbage and debris, from the land use area, to an approved waste disposal site as described in the approved Waste Management Plan. (Proposed change to WLWB's DRAFT LUP #41)	January 28, 2015: Confirmed.
13.	Land Use Permit Application Review, January 21, 2015	The Permittee shall ensure that all grease and oils from the exploration activities are stored in a manner that reduces the release of odours and prevents wildlife from accessing the attractants.	January 28, 2015: Husky confirms that these will be stored in sealed plastic pails and removed daily.
14.	Land Use Permit Application Review, January 21, 2015	The Permittee shall remove scrap metal, discarded machinery parts, tires, drums to an approved waste disposal facility.	January 28, 2015: Confirmed.
15.	Land Use Permit Application Review, January 21, 2015; GNWT IR #1 (round 1) April 10, 2015;	The Permittee shall submit a Wildlife & Wildlife Habitat Protection Plan (WWHPP) annually to regulatory agencies for review to ensure that negative effects to wildlife and wildlife habitat, within the project footprint including use of new and existing access roads/trails, are minimized. The GNWT requests revised Wildlife, Archeological, and Environmental Awareness Plans that incorporate information from the attached DRAFT GNWT Wildlife & Wildlife Habitat Protection Plan and Wildlife Effects Monitoring Program Guidelines.	January 28, 2015: Given the short duration and small scope of this early phase exploration program, Husky feels that a WWHPP is not warranted at this time. Husky and contractors will endeavour to record general wildlife sightings using the "Wildlife Observation" form provided by GNWT-ENR. Husky will submit completed forms to ENR at the end of each field operating season and copies can be obtained directly from them. April 30, 2015: In Husky's response to Environment Canada and GNWT comments during the Preliminary Screening process, Husky indicated that we will endeavour to record general wildlife sightings using the "Wildlife Observation" form provided by GNWT-ENR. Husky will submit completed forms to ENR at the end of each field operating season. In addition, Husky commits to reviewing the Wildlife, Archeological, and Environmental Awareness Plan and, where appropriate, incorporate information from the DRAFT GNWT Wildlife & Wildlife Habitat Protection Plan and Wildlife Effects Monitoring Program Guidelines, while

	<p>GNWT IR #1 (round 2) May 15, 2015</p>	<p>GNWT reiterates that the wildlife aspects of the submitted Wildlife, Archaeological, and Environmental Awareness Plans could be strengthened by incorporating detailed Standard Operating Procedures (SOPs) that protect wildlife and wildlife habitat, including along the proposed winter access route.</p> <p>Developing and implementing SOPs is not only beneficial to stakeholders in providing more detailed information, it has a dual purpose of providing onsite mitigation and monitoring instructions for field staff. The topics and number of SOPs would be appropriate to the spatial and temporal scale of the project.</p> <p>SOP Examples: Roles and responsibilities of the Wildlife Monitor or protocols for the mitigation and reporting for incidents on the winter access road.</p> <p>GNWT requests that the proponent submit, prior to the start of operations, revised Wildlife, Archaeological, and Environmental Awareness Plans that incorporate detailed SOPs and information from the DRAFT GNWT Wildlife & Wildlife Habitat Protection Plan and Wildlife Effects Monitoring Program Guidelines. This type of information would likely be required by the Land and Water Board as a condition of the Land Use Permit.</p>	<p>keeping it scaled to the actual scope of the project which is temporary and short duration.</p> <p>May 22, 2015: Husky has corresponded with Monica Wendt of GNWT Environment and Natural Resources (ENR) regarding our Wildlife, Archaeological, and Environmental Awareness Plan. Ms. Wendt has proposed to send examples of recently approved Plans that could be used as guidance to Husky as we review our own Plan. Husky acknowledges that ENR is looking for a revised Plan that incorporates SOPs that protect and mitigate impacts to wildlife and wildlife habitat. Since February 2015, when the EA process commenced, Husky has responded to several IRs regarding wildlife and habitat and has identified a number of SOPs and mitigation measures that we have since committed to and recognize that these would be incorporated into our revised Plan.</p> <p>Husky appreciates GNWT's acknowledgement that the revised Plan would be appropriate to the spatial and temporal scale of the project and would also allow us to consolidate our SOPs and mitigation measures into one document.</p> <p>In our response to the first round of IRs from GNWT, submitted to MVEIRB on April 30; 2015, Husky has already committed to reviewing the Wildlife, Archeological, and Environmental Awareness Plan and, where appropriate, incorporate information from the DRAFT GNWT Wildlife & Wildlife Habitat Protection Plan and Wildlife Effects Monitoring Program Guidelines, while keeping it scaled to the actual scope of the project which is temporary and short duration. As requested, the revised Plan will be submitted to ENR prior to the start of operations.</p>
<p>16.</p>	<p>Land Use Permit Application Review, January 21, 2015;</p>	<p>The Permittee shall provide the WLWB with shape files of their proposed project footprint, and that the shape files be shared and annually updated with responsible co-management authorities for boreal caribou in order to keep track of habitat disturbance within the NWT boreal woodland</p>	<p>January 28, 2015: Husky did submit our complete set of GIS files to the WLWB along with our application. We have committed to submitting our shapefiles of the final access routes, staging areas, storage areas, tent camp and cut areas upon project completion. Husky suggested in our response to Environment Canada that we keep a single</p>

		caribou range.	point of contact for this information and will provide this information to the Wek'eezhii Land and Water Board so that it can be posted on the registry and accessed by all organizations.
17.	Land Use Permit Application Review, January 21, 2015;	<p>The Permittee shall ensure the protection of species and key habitat listed under Species at Risk Act (SARA), assessed by the Committee on the Status of Endangered Wildlife in Canada (COSEWIC) or assessed by the NWT Species at Risk Committee (SARC).</p> <p>Table 1 – Terrestrial species at risk potentially occurring in the project area:</p> <p>Species: SARA Schedule 1, COSEWIC, SARC (NWT)</p> <ul style="list-style-type: none"> - Boreal Caribou: Threatened Threatened Threatened - Little Brown Myotis: Endangered Endangered Not Assessed - Wolverine (western pop.): Under consideration Special Concern Not At Risk - Wood Bison: Threatened Special Concern Not Assessed - Bank Swallow: Under Consideration Threatened Not Assessed - Barn Swallow: Under Consideration Threatened Not Assessed - Common Nighthawk: Threatened Threatened Not Assessed - Horned Grebe: Under Consideration Special Concern Not Assessed - Olive-sided Flycatcher: Threatened Threatened Not Assessed - Rusty Blackbird: Special Concern Special Concern Not Assessed - Short-eared Owl: Special Concern Special Concern Not Assessed - Yellow Rail: Special Concern Special Concern Not Assessed 	<p>January 28, 2015: Husky is committed to conducting the exploration program in the manner that minimizes impact on wildlife and habitat. Husky and contractors will endeavour to record general wildlife sightings using the "Wildlife Observation" form provided by GNWT-ENR. Husky will submit completed forms to ENR at the end of each field operating season and copies can be obtained directly from them.</p>

18.	Land Use Permit Application Review, January 21, 2015;	<p>The Permittee shall enact measures that minimize the release of contaminants and mitigate potential spills, including the establishment of all designated fuel storage and refueling areas that are:</p> <ul style="list-style-type: none"> At a distance greater than 30 meters from any local high water marks; Stored within a secondary containment (i.e. berm, double walled tank, etc.); Not located in a drainage channel; Subject to daily visual inspections; Spill kits located at all fuel storage, refueling and transfer locations. 	January 28, 2015: These commitments are already outlined in our Spill Contingency Plan.
19.	Land Use Permit Application Review, January 21, 2015;	The Permittee shall ensure any waste oils, including used filters, oily rags, used drums and contaminated soils are removed from site and disposed of at an approved waste disposal facility.	January 28, 2015: These commitments are already outlined in our Spill Contingency Plan.