



# Husky Oil Operations Limited

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707 8th Avenue S.W.  
Box 6525, Station D  
Calgary, Alberta, Canada  
T2P 3G7

Bus: (403) 298-6111  
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June 15, 2015

Mackenzie Valley Environmental Impact Review Board  
Box 938, #200 Scotia Centre  
5102 - 50 Avenue  
Yellowknife, NT  
X1A 2N7

Attention: Simon Toogood, Environmental Assessment Officer

Via email: [stoogood@reviewboard.ca](mailto:stoogood@reviewboard.ca)

**Re: Deninu K'ue First Nation Intervention for Environmental Assessment of Husky Oil Operations Limited Chedabucto Silica Project**

Husky Oil Operations Limited (Husky) has received an Intervention from the Deninu K'ue First Nation regarding the Environmental Assessment ("EA") of Husky's Chedabucto Silica Project. The Intervention was submitted to the Mackenzie Valley Environmental Impact Review Board (MVEIRB) on June 8, 2015.

Husky would like to extend its appreciation to the Deninu K'ue First Nation ("DKFN") for the information provided in their Intervention and submits the following information in response to the Intervention.

**Impact to Wildlife and Aquatic Resources**

The proposed exploration program was specifically designed to minimize the impact on wildlife and the environment. The short duration of the proposed exploration drilling and mini-bulk sampling programs, conducted in March/April under frozen ground condition in combination with the recommended mitigation measures should result in little to no risk of wildlife habitat loss. Avoidance is the principle means for mitigation of impact to wildlife. Local Monitors will be employed as part of the field crew and will be expected to recognize and advise the Project Field Supervisor of situations with high potential for wildlife encounters. Field personnel will be instructed to record all wildlife sightings and communicate the observations to the wildlife monitor. The monitor's chain of reporting will be directly to the Project Field Supervisor however, the monitor will be encouraged to report their findings to GNWT Land Use Inspector as well as their own organization. Field personnel will not be permitted to feed or interact with wildlife, hunt, trap, harass or otherwise disturb wildlife during the program.



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## Concerns about Cumulative Effects

Previous use in the area of the Chedabucto Mineral Claims including traditional use activities, recreational, mineral exploration programs and industrial uses are discussed at length in the Land Use Permit ("LUP") application, in responses to Information Requests during the Preliminary Screening and Environmental Assessment, and in the Interventions. The short duration exploration program proposed in Husky's LUP application is not expected to have any long term impact. It is premature to speculate on options for resource extraction. Considerations regarding possible future mining activity are not part of the scope of the EA.

## Engagement

Husky is committed to meaningful discussion and engagement with affected parties. Our intent is to be inclusive, so the DKFN will be contacted with respect to future engagement opportunities.

I trust the additional information and clarifications provided are sufficient for your requirements. Should you have any further requests for information, please contact the undersigned by telephone at (403) 298-6655 or by email at [ken.hansen@huskyenergy.com](mailto:ken.hansen@huskyenergy.com).

Sincerely,  
**HUSKY OIL OPERATIONS LIMITED**

for : Kenneth F. Hansen, P. Geol.  
Project Manager - NWT



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**Re: Government of the Northwest Territories' Intervention for Environmental Assessment of Husky Oil Operations Limited Chedabucto Silica Project**

Husky Oil Operations Limited (Husky) has reviewed the Intervention from the Government of the Northwest Territories' ("GNWT") regarding the Environmental Assessment ("EA") of Husky's Chedabucto Silica Project. The Intervention was submitted to the Mackenzie Valley Environmental Impact Review Board (MVEIRB) on June 8, 2015.

Husky submits the following information in response to the Intervention.

[Husky appreciates the information provided in the Intervention and has no further comment.](#)

I trust the additional information and clarifications provided are sufficient for your requirements. Should you have any further requests for information, please contact the undersigned by telephone at (403) 298-6655 or by email at [ken.hansen@huskyenergy.com](mailto:ken.hansen@huskyenergy.com).

Sincerely,  
**HUSKY OIL OPERATIONS LIMITED**

Kenneth F. Hansen, P. Geol.  
Project Manager - NWT



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Attention: Simon Toogood, Environmental Assessment Officer

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**Re: North Slave Métis Alliance Intervention for Environmental Assessment of Husky Oil Operations Limited Chedabucto Silica Project**

Husky Oil Operations Limited (Husky) has reviewed the Intervention from the North Slave Métis Alliance ("NSMA") regarding the Environmental Assessment ("EA") of Husky's Chedabucto Silica Project. The Intervention was submitted to the Mackenzie Valley Environmental Impact Review Board (MVEIRB) on June 8, 2015.

Husky submits the following information in response to the Intervention.

**#2 NSMA Traditional Knowledge in White Beach Point/Chedabucto Lake Area**

TK Research is ongoing, and relevant TK will be shared with the Review Board for consideration. NSMA anticipates the TK will include key fish and wildlife habitats, spiritual and archaeological sites, and other considerations pertinent to mitigation of impacts to the land and Aboriginal rights of our people. For example, one member frequently uses the Project area during winter season for hunting, indicating habitat quality, animal movements, as well as potential conflict with the exploration schedule.

**[Husky's Response to #2](#)**

**[Acknowledged.](#)**

**#4 Closure and Reclamation**

NSMA has asked the Proponent to clarify what is meant by "industry best practices". After the IR rounds, NSMA is still unclear what specific set of practices and guidelines the Proponent is going to follow. NSMA requests that the Proponent develop a defensible and demonstrated, by examples from actual industry practices and literatures, Closure and Reclamation Plan.



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## Husky's Response to #4

Appendix II of the Land Use Permit Application contains a Closure and Reclamation Plan that we believe is scaled appropriate for the scope of the proposed program. Additional clarity and detail was provided in responses to Information Requests received during the Preliminary Screening and subsequent Environmental Assessment.

## #6 Assessment of Potential Impacts to the NSMA Members and Their Aboriginal Rights

Due to the delay in the completion of TK Research, adequate assessment of the Project's potential impact to North Slave Métis Aboriginal rights has yet to be done. However, NSMA would like to note that we recognize the Project under consideration is an early exploration, involving relatively small disturbance to the land. We also acknowledge that the Project has agreed to avoid archaeological and other culturally significant sites that have so far been identified. This lends us certain confidence that the proposed Project is unlikely to significantly impact the land and Aboriginal rights of our members.

However, as further evidences are collected and analyzed through the ongoing TK Research, NSMA will likely request additional specific mitigation measures, including exclusion of certain areas or seasons, and specific closure and reclamation practices. This will be provided to the Review Board prior to the Public Hearing.

## Husky's Response to #6

We look forward to the completion of the TK Research and intend to incorporate the results in planning for the field programs.

I trust the additional information and clarifications provided are sufficient for your requirements. Should you have any further requests for information, please contact the undersigned by telephone at (403) 298-6655 or by email at [ken.hansen@huskyenergy.com](mailto:ken.hansen@huskyenergy.com).

Sincerely,  
**HUSKY OIL OPERATIONS LIMITED**

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Via email: [stoogood@reviewboard.ca](mailto:stoogood@reviewboard.ca)

**Re: Tłıchǰ Government Intervention for Environmental Assessment of Husky Oil Operations Limited Chedabucto Silica Project**

Husky Oil Operations Limited (Husky) has reviewed the Intervention from the Tłıchǰ Government regarding the Environmental Assessment ("EA") of Husky's Chedabucto Silica Project. The Intervention was submitted to the Mackenzie Valley Environmental Impact Review Board (MVEIRB) on June 8, 2015.

Husky submits the following information in response to the Intervention.

Consultation on the issuance of mineral claims

Husky has no comment.

Land withdrawal

The relationship of the Chedabucto Mineral Claims and the Dinàgà Wek'èhodi as a candidate for a National Wildlife Area and as part of the NWT Protected Areas Strategy (PAS), has been reviewed extensively in the Preliminary Screening and subsequent Environmental Assessment ("EA") Information Requests ("IRs") and in Husky's responses thereto. The principle reason for Environment Canada's sponsorship of the PAS Area was protection of the Important Bird Area which is located along the northeastern shore of the North Arm and does not extend across the Chedabucto Mineral Claims (see "NT086\_IBA\_North Arm with Husky claims" map that we submitted to MVEIRB (PR #80)). Husky has been quite clear in our position that the Chedabucto Mineral Claims are exempt from, and are not part of, the Interim Land Withdrawal.



## Potential for mining activity

Husky's Land Use Permit application seeks approval to conduct an early stage exploration program to obtain the geological information necessary to assess whether or not the Chedabucto silica deposit could meet the threshold for commercial development. It is premature to speculate on options for resource extraction. Considerations regarding possible future mining activity are not part of the scope of the EA.

## Co-location with significant areas

It is Husky's opinion, that the information obtained by the proposed exploration program would complement the non-renewable resource assessment commissioned by the Kwets'ootl'aa Working Group in 2013. All of the available data will be used to evaluate the economic potential of the silica resource. This approach is consistent with the PAS process which "promotes a sound approach to land use decision-making by including the best available traditional, ecological, cultural, and economic knowledge". Future land-use decisions for the Chedabucto area should take into consideration all of these factors.

## Impacts of the activity

The proposed exploration program was specifically designed to minimize the impact on wildlife and the environment. Considerable effort has been made through Archaeological and TK studies to identify areas of potential concern; nine proposed drill locations were deleted to avoid impacts to sites of archaeological interest. The short duration of the proposed exploration program, conducted under frozen ground condition in combination with the recommended mitigation measures, should result in little to no risk of wildlife habitat loss.

I trust the additional information and clarifications provided are sufficient for your requirements. Should you have any further requests for information, please contact the undersigned by telephone at (403) 298-6655 or by email at [ken.hansen@huskyenergy.com](mailto:ken.hansen@huskyenergy.com).

Sincerely,  
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