



Mackenzie Valley
Environmental Impact
Review Board

MACKENZIE VALLEY ENVIRONMENTAL IMPACT REVIEW BOARD

**EA0506-007 Paramount Significant
Discovery Licence 8, 2D Geophysical
Program (SDL8)**

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Information Requests – Round Two

EA0506-007 Paramount SDL 8, 2D Geophysical Program (SDL8) – Information Requests

IR Number: IR0506-007-15
Source: Ka'a'gee Tu First Nation (modified by MVEIRB)
To: Paramount Resources Ltd.
Reference: DAR Section D(I)

Preamble

Paramount uses the phrase “low impact seismic” or “LIS” in referring to its seismic activities but does not explain the reference for the phrase.

Request

Please provide the origin, definition and details of “low-impact seismic” as that phrase is used by Paramount. Provide evidence to support Paramount’s response.

EA0506-007 Paramount SDL 8, 2D Geophysical Program (SDL8) – Information Requests

IR Number: IR0506-007-16
Source: Ka'a'gee Tu First Nation
To: Paramount Resources Ltd.
Reference: DAR Section D(2)

Preamble

Paramount refers to the use of mulchers as a method for reducing line widths to 4 m but only if mulchers were available for use on this project.

Request

Please comment on the likelihood that mulchers will be available for use on this project. If the use of mulchers is unlikely, please explain why.

EA0506-007 Paramount SDL 8, 2D Geophysical Program (SDL8) – Information Requests

IR Number: IR0506-007-17
Source: Ka'a'gee Tu First Nation
To: Paramount Resources Ltd.
Reference: DAR Section D(4)

Preamble

Paramount states that lines will be hand-cut to a width of 1.75 m on steep slopes to allow the placement of geophones and a receiver tailspread but notes that there will be no source points.

Request

Please explain the comment about no source points. What information will be collected by the geophones if there is no source?

IR Number: IR0506-007-18
Source: Ka'a'gee Tu First Nation (modified by MVEIRB)
To: Paramount Resources Ltd.
Reference: DAR Section D(5)
DAR Section D(6)

Preamble

Paramount does not provide a satisfactory answer to D(5). For example in answering D(5)(a), Paramount seems to imply that its proposed program will reduce the impacts on the environment as compared to a heli-portable project. However, Paramount provides absolutely no evidence to support this contention.

Similarly, in answering D(5)(b), Paramount implies that the use of hand-cutting and helicopters is unsafe but provides no evidence to support this contention.

Paramount says that its proposed line widths represent the upper end of the spectrum but does not explain what factors require the use of these upper end line widths for this project.

Despite hand-cutting being specifically mentioned by the MVEIRB in D(6)(b), Paramount's response makes no mention of it.

Request

1. While recognizing that various species might be impacted differently, 1) contrast the potential overall impacts on wildlife due to various project alternatives in an impact matrix, and 2) rank the overall impacts of the various combinations of alternatives and suggest the optimal alternatives scenario that would achieve the objective of minimizing overall wildlife impacts due to noise, habitat disturbance, increased hunting access, etc.

The project alternatives which should be considered are:

- Project Timing – spring, summer, fall and winter
 - Project Clearing Methods – hand cut, mulchers and bulldozer
 - Project Data Collection – Standard Dynamite Drill, Enviro-Drill, Vibroseis, Mini-Vibrator
 - Project Access Routes – only existing lines versus a combination of existing and new lines
 - Project Access Methods– helicopter, ground vehicle
2. Reference and provide statistics on accident and injury rates, for both Paramount and industry-wide, for 1) seismic projects as proposed by Paramount and 2) seismic projects utilizing hand-cutting and helicopter support.
 3. Explain why Paramount is proposing to use line widths that are at the upper end of the spectrum.
 4. Estimate the timber volume cutting requirements for 1.75 m wide lines versus 6 m wide lines.

IR Number: IR0506-007-19
Source: Ka'a'gee Tu First Nation
To: Paramount Resources Ltd.
Reference: DAR Section E(I)

Preamble

The MVEIRB requested Paramount to provide the employment requirements for the project as proposed by Paramount but did not ask for the employment requirements for the alternative means of conducting the project.

Request

1. A listing of all employment requirements for the SDL8 program for the following project alternatives:
 - a. a heliportable seismic program with all hand-cut lines;
 - b. a vibroseis program as proposed by Paramount but with all lines hand-cut; and
 - c. a dynamite seismic as program as proposed by Paramount but with all lines hand-cut.
2. Estimates of total project equipment costs and labor costs for the project as proposed by Paramount versus the 3 alternative means outlined in the first part of this IR.

IR Number: IR0506-007-20
Source: Ka'a'gee Tu First Nation
To: Paramount Resources Ltd.
Reference: No reference provided

Preamble

The COGOA requires Development Plans and Benefits Plans prior to the undertaking of certain oil and gas activities on frontier lands.

Request

Is there a Development Plan and Benefits Plan in place for SDL 8? If yes, please provide copies. If no, please describe the timing and process that will be used by Paramount in developing and obtaining approval for these documents.

EA0506-007 Paramount SDL 8, 2D Geophysical Program (SDL8) – Information Requests

IR Number: IR0506-007-21
Source: Ka'a'gee Tu First Nation (modified by MVEIRB)
To: Paramount Resources Ltd.
Reference: No reference provided

Preamble

A harvester compensation agreement (HCA) is a KTFN requirement for companies such as Paramount that wish to work on KTFN traditional lands.

Request

Is it Paramount's opinion that the SDL8 program will have a significant adverse impact on harvesting in the development area? If so, has Paramount established a process to compensate harvesters for losses incurred? Please describe and provide details of the process if it has been established.

EA0506-007 Paramount SDL 8, 2D Geophysical Program (SDL8) – Information Requests

IR Number: IR0506-007-22
Source: Ka'a'gee Tu First Nation
To: Paramount Resources Ltd.
Reference: No reference provided

Preamble

Paramount has been conducting a seismic line revegetation study in the Cameron Hills.

Request

Please provide a copy of the seismic line revegetation study and discuss how the results of this study can be used to improve this project.

IR Number: IR0506-007-23
Source: Ka'a'gee Tu First Nation
To: Paramount Resources Ltd.
Reference: No reference provided

Preamble

Paramount should have an environmental protection plan manual.

Request

Please provide a copy of the environmental protection plan manual for this project

IR Number: IR0506-007-24
Source: Ka'a'gee Tu First Nation
To: Indian and Northern Affairs Canada
Reference: INAC response to IR 0506-007-12

Preamble

In considering Paramount's proposed revegetation seed mix, INAC states: *"They would not be expected to persist, or to spread. As such, they pose no danger of out-competing local species, nor otherwise affecting vegetation native to the area."*

Request

Does INAC have any field research applicable to this seed mix and the SDL 8 landscape to justify this position? If yes, please provide it. If no, please provide the evidence that INAC is using to support this position.

EA0506-007 Paramount SDL 8, 2D Geophysical Program (SDL8) – Information Requests

IR Number: IR0506-007-25
Source: Ka'a'gee Tu First Nation
To: Indian and Northern Affairs Canada
Reference: INAC response to IR 0506-007-11

Preamble

One of the conditions proposed by INAC would give the Inspector the authority to extend project activities beyond Apr. 1st but does not mention any authority to end project activities prior to Apr. 1st.

Request

Does the MVLWB or the Inspector have the authority to order a halt to project activities prior to Apr. 1st in the event of an early spring? If yes, describe the process and speed with which such an order could be issued.

IR Number: IR0506-007-26
Source: Ka'a'gee Tu First Nation (modified by MVEIRB)
To: Indian and Northern Affairs Canada
Reference: INAC response to IR 0506-007-12

Preamble

The conditions of the LUP and the WL would be enforced by the INAC Inspector.

INAC provided a copy of its compliance and enforcement policy from Nov. 19, 1998, which pre-dates the existence of the MVLWB and is from a period in which INAC both issued the LUP and inspected for compliance.

Request

Please provide the following information.

1. What would be the frequency and timing of the Inspector's visits to the project area before, during and after the project activities?
2. Will the KTFN be immediately informed of any potential problems encountered during inspection of the SDL8 development and consulted on the manner in which these problems are to be corrected?
3. A detailed description of the role of the MVLWB in the inspection and enforcement of LUP and WL conditions. Is there a protocol in place between INAC and the MVLWB to ensure swift, coordinated action can occur to enforce conditions and perhaps order additional conditions as needed to protect the environment? If yes, please provide copies of this protocol. If there is no protocol, please explain why not.

IR Number: IR0506-007-27
Source: Ka'a'gee Tu First Nation
To: Indian and Northern Affairs Canada
Reference: No reference

Preamble

One of the conditions proposed by INAC would give the Inspector the authority to extend project activities beyond Apr. 1st but does not mention any authority to end project activities prior to Apr. 1st.

Request

Please provide the following information.

1. Copies of all previous inspection reports of Paramount seismic projects in the NWT with any problems, concerns or infractions highlighted. Does the MVLWB or the Inspector have the authority to order a halt to project activities prior to Apr. 1st in the event of an early spring? If yes, describe the process and speed with which such an order could be issued.
2. Copies of any orders or instructions that were issued to Paramount.
3. Identification of any outstanding concerns and plans for resolving those concerns.

EA0506-007 Paramount SDL 8, 2D Geophysical Program (SDL8) – Information Requests

IR Number: IR0506-007-28
Source: Ka'a'gee Tu First Nation
To: Indian and Northern Affairs Canada
Reference: No reference

Preamble

Increased access both to and within the project area is a concern for the KTFN.

Request

Please provide an analysis of Paramount's ability to prevent public use of the winter access roads into and within the project area. Does Paramount have the ability to prevent public use of its winter roads? If no, please explain whether or not INAC or another organization does. What specific measures can be undertaken to prevent this project from increasing access both to and within this project area.

IR Number: IR0506-007-29
Source: Ka'a'gee Tu First Nation
To: National Energy Board
Reference: No reference

Preamble

The NEB has inspection responsibilities for this project.

Request

Please provide the following information.

1. If environmental problems are encountered during inspections, please explain the NEB process for informing and involving the KTFN on these problems and developing solutions.
2. Copies of all previous inspection reports of Paramount seismic projects in the NWT with any problems, concerns or infractions highlighted.
3. Copies of any orders or instructions that were issued to Paramount.
4. Identification of any outstanding concerns and plans for resolving those concerns.

IR Number: IR0506-007-30
Source: Ka'a'gee Tu First Nation
To: Government of the Northwest Territories
Reference: GNWT response to IR 0506-007-7

Preamble

The GNWT discussed the potential impacts of the project upon forest resources.

Request

Please provide the following information.

1. Does the GNWT have any direct control over Paramount's timber cutting activities, such as through a permit or license, or does the GNWT have to rely on other organizations such as the MVLWB and the NEB? Is there any financial charge to Paramount for the cutting of timber given that a portion of the allowable harvest is being lost to this project? What rights does Paramount have respect to the use of cut timber?
2. Does the GNWT (or the MVLWB or the NEB) have the authority to require Paramount to conduct tree planting to expedite the revegetation of the seismic lines? If yes, please provide a description of the tree planting program that would be appropriate for this project.