



October 24, 2024

Mark Cliffe-Phillips
Executive Director
Mackenzie Valley Environmental Impact Review Board
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YELLOWKNIFE NT X1A 2N7

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Dear Mark Cliffe-Phillips,

Thank you for the opportunity to review and provide comments on Imperial Oil Resources NWT Limited's (Imperial) request for ruling submitted on October 9, 2024 relating to the Norman Wells Operations and further to the Mackenzie Valley Environmental Impact Review Board's (the Board) Directive issued on October 16, 2024. The Board has asked governments and organizations with referral authority under subsection 126(2) of the *Mackenzie Valley Resource Management Act* (the Act) for their views on Imperial's request for ruling to the Board. Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC) and the Canadian Northern Economic Development Agency (CanNor) collaborated on this response, and note that it does not necessarily represent the views of the other potential federal referral authorities, as there was insufficient time to consult them in the circumstances.

The Board's jurisdiction to conduct an environmental assessment is set out in the Act. Section 157.1 sets out expectations to the application of Part 5 of the Act, and therefore the jurisdiction of the Board, including to conduct an environmental assessment. The application of section 157.1 to the Norman Wells Operations will turn on factual findings that the Board is best placed to make, now that this request for ruling is before it. We respectfully acknowledge the submissions made on October 23, 2024 to the Board by the Sahtu Secretariat Incorporated and the Tłı̨chǫ Government regarding the relationship between the Sahtu Dene and Metis Comprehensive Settlement Agreement and the Act, as it pertains to this request for a ruling. Canada has not had sufficient time to prepare a considered submission specifically responsive in that regard.

CIRNAC and CanNor appreciate the Board and its staff's work to this point in the process, and have utmost confidence in the Board's ability to make a fair and reasoned decision that upholds the co-management regime as set out in the Act.

Sincerely,

Kim Pawley
Director, Environment and Renewable Resources
Natural Resources and Environment Branch

c.c. Lisa Dyer, Canadian Northern Economic Development Agency



GCDPCS # 130377790