

September 14, 2023

Canada Energy Regulator Suite 210 – 517 Tenth Avenue SW Calgary, Alberta T2R 0A8

Attention: Michael Van Appelen VP, Energy Adjudication

Dear Sir:

Re: Imperial Oil Resources N.W.T. Limited ("Imperial") statement that it has not been made aware of "any specific concerns regarding continued operations" of the Norman Wells Operations ("NWO")

We are writing in response to a letter from Imperial to the Canadian Energy Regulator, dated July 28, 2023, regarding the NWO.

Yamoga Lands Corporation is a Designated Sahtu Organization under the Sahtu Dene and Métis Comprehensive Land Claim Agreement and represents the rights and interests of Dene Participants in the community of Fort Good Hope.

We note that Imperial's July 28, 2023 letter, at the bottom of page 3, says the following:

"Through Imperial's engagement with communities and other stakeholders to date, <u>Imperial has</u> not been made aware of any specific concerns regarding continued operations at <u>NWO</u> beyond the current term of the OA or the Water Licence."

Contrary to Imperial's assertion, we have repeatedly voiced concerns regarding the continued operations at NWO. On May 16, 2023, the Dene and Métis leadership of Fort Good Hope hosted Imperial for a lengthy meeting where the leadership expressed very strong concerns regarding the risks created by the NWO to the constitutionally protected rights of the Dene and Métis, including their right to the maintenance of the quality of water in the Mackenzie River. Fort Good Hope leadership will be meeting again with Imperial in October 2023 and will once again express our very strong concerns regarding the continued operations at NWO.

The Yamoga Lands Corporation intends to submit a statement of concern to the Canada Energy Regulator to provide a brief summary of our concerns. Canada via the Canada Energy Regulator, the Sahtu Land and Water Board and the Mackenzie Valley Environmental Impact Review Board have a constitutional

obligation to consult, and where appropriate accommodate the Dene and Métis of Fort Good Hope with respect to decisions impacting our rights, including decisions respecting the operations and closure and reclamation of NWO. However, we are not in a position to participate in consultation or accommodation on an informed or meaningful basis because we do not have funding to support our sustained involvement in the NWO and regulatory processes. As a result, there is a real risk that the Canada Energy Regulator will issue authorizations that affect our rights without Canada having discharged its duty to consult.

To support our continued engagement, we expect Canada to provide sustained and long-term funding for our participation in regulatory processes for NWO. We are in the process of finalizing a workplan and budget for sustained funding in respect of NWO, which we expect to share with Canada and Imperial shortly.

Yours Truly

Edwin Erutse,

President, Yamoga Lands Corporation

Cc John Gregory and Sarah McLaren, Imperial

Director Regional General – Northwest Territories, Crown Indigenous Relations Canada

P. Dixon – Executive Director, Sahtu Land and Water Board

M. Cliff, Philips – Executive Director, Mackenzie Valley Environmental Impact Review Board

C. McNeely - Chair, Sahtu Secretariat Incorporated