



Imperial Oil

ERD-001
Imperial Round 2
IR Responses.

Imperial Oil Resources Ventures Limited

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November 11, 2004

Mackenzie Valley Environmental Impact Review Board
P.O. Box 938
5102 - 50th Avenue
Yellowknife, NT X1A 2N7

(via e-mail & hard copy)

Attention: Mr. Alan Ehrlich
Senior Environmental Assessment Officer

Dear Mr. Ehrlich,

**Re: Responses to Round 2 Information Requests regarding the Developer's
Assessment Report Supporting the MVEIRB Environmental Assessment of the
2004 Winter Field Geotechnical Investigation Program - Deh Cho Region
(MVEIRB Reference EA 03-009)**

Imperial Oil Resources Ventures Limited (Imperial) received the MVEIRB Round 2 Information Requests regarding the Developer's Assessment Report supporting the MVEIRB Environmental Assessment of the 2004 Winter Field Geotechnical Investigation Program - Deh Cho Region issued by the MVEIRB on 26 October, 2004. Of the 30 Information Requests, 26 were directed to Imperial. Many of these 26 Information Requests had multiple parts, so 49 individual responses have been provided by Imperial.

The attachment to this letter contains the responses developed by Imperial to the MVEIRB Round 2 Information Requests. With the submission of this information, I look forward to confirmation that the MVEIRB Round 2 Information Request process is now complete. If you have any questions regarding these matters please contact Jim Hawkins at (403) 237-2806.

Sincerely,

S. D. Martin
Manager, Regulatory Affairs
Mackenzie Gas Project

Attachment

Imperial Response - IR 2.1A (MVEIRB)

Application Name: 2004 Winter Field Geotechnical Investigation Program in the Deh Cho Region

Document Reference: Developer's Assessment Report

Request From: Deh Cho First Nations - Pipeline Working Group

Regulatory Agency Reference: 1A

DAR Section: 1.4 Developer's Profile

ToR Section: B-1 Developer Profile

Imperial Reference: DAR IR 2.1A (MVEIRB)

INFORMATION REQUEST:

2.1A In Section 1.4, Imperial Oil states that it has successfully completed similar geotechnical investigation programs in other northern regions in a safe and environmentally sensitive manner. These other programs include projects in the Inuvialuit, Gwich'in and Sahtu land claim areas during the winters of 2003 and 2004.

INAC and the NEB both have responsibilities for inspecting oil and gas projects such as those noted above and should have inspection reports available.

- Please provide the following information:
 - Copies of all inspection reports resulting from Imperial Oil's 2003 and 2004 winter geotechnical projects in the Inuvialuit, Sahtu and Gwich'in land claim areas. Highlight any problems, concerns or infractions.

RESPONSE:

This Information Request was directed by the MVEIRB to Indian and Northern Affairs Canada. Preparing the response to this Information Request is the responsibility of Indian and Northern Affairs Canada.

Imperial Response - IR 2.1B (MVEIRB)

Application Name: 2004 Winter Field Geotechnical Investigation Program in the Deh Cho Region

Document Reference: Developer's Assessment Report

Request From: Deh Cho First Nations - Pipeline Working Group

Regulatory Agency Reference: 1B

DAR Section: 1.4 Developer's Profile

ToR Section: B-1 Developer Profile

Imperial Reference: DAR IR 2.1B (MVEIRB)

INFORMATION REQUEST:

2.1B In Section 1.4, Imperial Oil states that it has successfully completed similar geotechnical investigation programs in other northern regions in a safe and environmentally sensitive manner. These other programs include projects in the Inuvialuit, Gwich'in and Sahtu land claim areas during the winters of 2003 and 2004.

INAC and the NEB both have responsibilities for inspecting oil and gas projects such as those noted above and should have inspection reports available.

- Please provide the following information:
 - Copies of any orders or instructions that were issued to Imperial.

RESPONSE:

This Information Request was directed by the MVEIRB to Indian and Northern Affairs Canada. Preparing the response to this Information Request is the responsibility of Indian and Northern Affairs Canada.

Imperial Response - IR 2.1C (MVEIRB)

Application Name: 2004 Winter Field Geotechnical Investigation Program in the Deh Cho Region

Document Reference: Developer's Assessment Report

Request From: Deh Cho First Nations - Pipeline Working Group

Regulatory Agency Reference: 1C

DAR Section: 1.4 Developer's Profile

ToR Section: B-1 Developer Profile

Imperial Reference: DAR IR 2.1C (PWG-DFN & MVEIRB)

INFORMATION REQUEST:

1.1C In Section 1.4, Imperial Oil states that it has successfully completed similar geotechnical investigation programs in other northern regions in a safe and environmentally sensitive manner. These other programs include projects in the Inuvialuit, Gwich'in and Sahtu land claim areas during the winters of 2003 and 2004.

INAC and the NEB both have responsibilities for inspecting oil and gas projects such as those noted above and should have inspection reports available.

- Please provide the following information:
 - Identify any outstanding concerns and plans for resolving those concerns.

RESPONSE:

This Information Request was directed by the MVEIRB to Indian and Northern Affairs Canada. Preparing the response to this Information Request is the responsibility of Indian and Northern Affairs Canada.

Imperial Response - IR 2.1D (MVEIRB)

Application Name: 2004 Winter Field Geotechnical Investigation Program in the Deh Cho Region

Document Reference: Developer's Assessment Report

Request From: Deh Cho First Nations - Pipeline Working Group

Regulatory Agency Reference: 1D

DAR Section: 2.4 Developer's Profile

ToR Section: B-1D Developer Profile

Imperial Reference: DAR IR 2.1D (MVEIRB)

INFORMATION REQUEST:

2.1D In Section 1.4, Imperial Oil states that it has successfully completed similar geotechnical investigation programs in other northern regions in a safe and environmentally sensitive manner. These other programs include projects in the Inuvialuit, Gwich'in and Sahtu land claim areas during the winters of 2003 and 2004.

INAC and the NEB both have responsibilities for inspecting oil and gas projects such as those noted above and should have inspection reports available.

- Please provide the following information:
 - Assuming that Imperial Oil will receive the approvals required to proceed with the winter work in the Deh Cho Region, please confirm that the INAC inspectors will provide the Deh Cho Pipeline Working Group and the individual Deh Cho communities with copies of inspection reports, and any orders or instructions issued to Imperial, as soon as they are prepared.
-

RESPONSE:

This Information Request was directed by the MVEIRB to Indian and Northern Affairs Canada. Preparing the response to this Information Request is the responsibility of Indian and Northern Affairs Canada.

Imperial Response - IR 2.1E (MVEIRB)

Application Name: 2004 Winter Field Geotechnical Investigation Program in the Deh Cho Region

Document Reference: Developer's Assessment Report

Request From: Deh Cho First Nations - Pipeline Working Group

Regulatory Agency Reference: 1E

DAR Section: 1.4 Developer's Profile

ToR Section: B-1 Developer Profile

Imperial Reference: DAR IR 2.1E (MVEIRB)

INFORMATION REQUEST:

2.1E In Section 1.4, Imperial Oil states that it has successfully completed similar geotechnical investigation programs in other northern regions in a safe and environmentally sensitive manner. These other programs include projects in the Inuvialuit, Gwich'in and Sahtu land claim areas during the winters of 2003 and 2004.

INAC and the NEB both have responsibilities for inspecting oil and gas projects such as those noted above and should have inspection reports available.

- Please provide the following information:
 - If the position taken in responding to (d) is that the INAC and NEB inspectors will not provide inspection information directly to the Deh Cho Pipeline Working Group and the individual communities, please explain how INAC and the NEB will ensure that the Pipeline Working Group and the individual communities will be made aware of, and kept informed on, environmental problems identified by the inspectors.

RESPONSE:

This Information Request was directed by the MVEIRB to Indian and Northern Affairs Canada. Preparing the response to this Information Request is the responsibility of Indian and Northern Affairs Canada.

Imperial Response - IR 2.2A (MVEIRB)

Application Name: 2004 Winter Field Geotechnical Investigation Program in the Deh Cho Region

Document Reference: Developer's Assessment Report

Request From: Deh Cho First Nations - Pipeline Working Group

Regulatory Agency Reference: 2A

DAR Section: 2.1 Public Involvement

ToR Section: F-1 Methods and Issues

Imperial Reference: DAR IR 2.2A (MVEIRB)

INFORMATION REQUEST:

2.2A Imperial describes the consultation program it has been using for the project, which includes "ensuring ... the protocols and traditional communication structure are respected". However, Imperial fails to mention the Deh Cho Consultation Principles, which were provided to it by the PWG on Oct. 30th, 2003.

On June 1, 2004, the Review Board issued its Report of Environmental Assessment and Reasons for Decision on the Paramount Resources Ltd. Cameron Hills Extension Project. On Page 51 of that report, the Review Board stated:

"The Review Board further acknowledges the efforts of the Deh Cho First Nation in establishing the Deh Cho First nation Consultation Principles (Appendix D), and supports the use of these principles as guidelines to conducting meaningful consultation with Deh Cho communities."

- Please provide the following information:
 - Does Imperial Oil accept that its consultation activities must abide by the Deh Cho Consultation Principles?
-

RESPONSE:

Imperial has not adopted the Deh Cho Consultation Principles for consultations related to the Program. For the Land Use Permit and Water License applications related to the Program which are filed with the Mackenzie Valley Land and Water Board, Imperial has used the consultation principles specified in the "Public Involvement Guidelines for Permit and License Applications to the Mackenzie Valley Land and Water Board, October 2003."

Imperial Response - IR 2.2B (MVEIRB)

Application Name: 2004 Winter Field Geotechnical Investigation Program in the Deh Cho Region

Document Reference: Developer's Assessment Report

Request From: Deh Cho First Nations - Pipeline Working Group

Regulatory Agency Reference: 2B

DAR Section: 2.1 Public Involvement

ToR Section: F-1 Methods and Issues

Imperial Reference: DAR IR 2.2B (MVEIRB)

INFORMATION REQUEST:

2.2 B Imperial describes the consultation program it has been using for the project, which includes "ensuring ... the protocols and traditional communication structure are respected". However, Imperial fails to mention the Deh Cho Consultation Principles, which were provided to it by the PWG on Oct. 30th, 2003.

On June 1, 2004, the Review Board issued its Report of Environmental Assessment and Reasons for Decision on the Paramount Resources Ltd. Cameron Hills Extension Project. On Page 51 of that report, the Review Board stated:

"The Review Board further acknowledges the efforts of the Deh Cho First Nation in establishing the Deh Cho First nation Consultation Principles (Appendix D), and supports the use of these principles as guidelines to conducting meaningful consultation with Deh Cho communities."

- Please provide the following information:
 - If yes, explain how your consultation process for this project has satisfied the requirements of the Deh Cho Consultation Principles.

RESPONSE:

The response provided in IR 2.2A describes the approach taken by Imperial with respect to consultation.

Imperial Response - IR 2.2C (MVEIRB)

Application Name: 2004 Winter Field Geotechnical Investigation Program in the Deh Cho Region

Document Reference: Developer's Assessment Report

Request From: Deh Cho First Nations - Pipeline Working Group

Regulatory Agency Reference: 2C

DAR Section: 2.1 Public Involvement

ToR Section: F-1 Methods and Issues

Imperial Reference: DAR IR 2.2C (MVEIRB)

INFORMATION REQUEST:

2.2C Imperial describes the consultation program it has been using for the project, which includes "ensuring ... the protocols and traditional communication structure are respected". However, Imperial fails to mention the Deh Cho Consultation Principles, which were provided to it by the PWG on Oct. 30th, 2003.

On June 1, 2004, the Review Board issued its Report of Environmental Assessment and Reasons for Decision on the Paramount Resources Ltd. Cameron Hills Extension Project. On Page 51 of that report, the Review Board stated:

"The Review Board further acknowledges the efforts of the Deh Cho First Nation in establishing the Deh Cho First nation Consultation Principles (Appendix D), and supports the use of these principles as guidelines to conducting meaningful consultation with Deh Cho communities."

- Please provide the following information:
 - If no, identify which principles Imperial Oil does not accept and explain why.

RESPONSE:

The response provided in IR 2.2A describes the approach taken by Imperial with respect to consultation.

Imperial Response - IR 2.3A (MVEIRB)

Application Name: 2004 Winter Field Geotechnical Investigation Program in the Deh Cho Region

Document Reference: Developer's Assessment Report

Request From: Deh Cho First Nations - Pipeline Working Group

Regulatory Agency Reference: 3A

DAR Section: no reference

ToR Section: no reference

Imperial Reference: DAR IR 2.3A (MVEIRB)

INFORMATION REQUEST:

2.3A Government agencies that issue authorizations must discharge the Crown's fiduciary duty in an effort to justify infringement of aboriginal or treaty rights. The Supreme Court of Canada has established conditions that must be satisfied in this process such as ensuring that aboriginal people receive economic benefits from the land and resources in question and that management decisions and processes about land and resources must include significant involvement, with the bare minimum being deep and meaningful consultation.

On June 1, 2004, the Review Board issued its Report of Environmental Assessment and Reasons for Decision on the Paramount Resources Ltd. Cameron Hills Extension Project. On Page 51 of that report, the Review Board Stated:

"The Review Board further acknowledges the efforts of the Deh Cho First Nation Consultation Principles (Appendix D) and supports the use of these principles as guidelines to conducting meaningful consultation with Deh Cho communities."

- Please provide the following information:
 - Does your organization accept that its consultation activities must abide by the Dehcho Consultation Principles?

RESPONSE:

This Information Request was directed by the MVEIRB to Indian and Northern Affairs Canada. Preparing the response to this Information Request is the responsibility of Indian and Northern Affairs Canada.

Imperial Response - IR 2.3B (MVEIRB)

Application Name: 2004 Winter Field Geotechnical Investigation Program in the Deh Cho Region

Document Reference: Developer's Assessment Report

Request From: Deh Cho First Nations - Pipeline Working Group

Regulatory Agency Reference: 3B

DAR Section: no reference

ToR Section: no reference

Imperial Reference: DAR IR 2.3B (MVEIRB)

INFORMATION REQUEST:

2.3 B Government agencies that issue authorizations must discharge the Crown's fiduciary duty in an effort to justify infringement of aboriginal or treaty rights. The Supreme Court of Canada has established conditions that must be satisfied in this process such as ensuring that aboriginal people receive economic benefits from the land and resources in question and that management decisions and processes about land and resources must include significant involvement, with the bare minimum being deep and meaningful consultation.

On June 1, 2004, the Review Board issued its Report of Environmental Assessment and Reasons for Decision on the Paramount Resources Ltd. Cameron Hills Extension Project. On Page 51 of that report, the Review Board Stated:

"The Review Board further acknowledges the efforts of the Deh Cho First Nation Consultation Principles (Appendix D) and supports the use of these principles as guidelines to conducting meaningful consultation with Deh Cho communities."

- Please provide the following information:
 - If yes, explain how your consultation process for this project has satisfied the requirements of the Dehcho Consultation Principles.

RESPONSE:

This Information Request was directed by the MVEIRB to Indian and Northern Affairs Canada. Preparing the response to this Information Request is the responsibility of Indian and Northern Affairs Canada.

Imperial Response - IR 2.3C (MVEIRB)

Application Name: 2004 Winter Field Geotechnical Investigation Program in the Deh Cho Region

Document Reference: Developer's Assessment Report

Request From: Deh Cho First Nations - Pipeline Working Group

Regulatory Agency Reference: 3C

DAR Section: no reference

ToR Section: no reference

Imperial Reference: DAR IR 2.3C (MVEIRB)

INFORMATION REQUEST:

2.3 C Government agencies that issue authorizations must discharge the Crown's fiduciary duty in an effort to justify infringement of aboriginal or treaty rights. The Supreme Court of Canada has established conditions that must be satisfied in this process such as ensuring that aboriginal people receive economic benefits from the land and resources in question and that management decisions and processes about land and resources must include significant involvement, with the bare minimum being deep and meaningful consultation.

On June 1, 2004, the Review Board issued its Report of Environmental Assessment and Reasons for Decision on the Paramount Resources Ltd. Cameron Hills Extension Project. On Page 51 of that report, the Review Board Stated:

"The Review Board further acknowledges the efforts of the Deh Cho First Nation Consultation Principles (Appendix D) and supports the use of these principles as guidelines to conducting meaningful consultation with Deh Cho communities."

- Please provide the following information:
 - If no, identify which principles your organization does not accept and explain why.

RESPONSE:

This Information Request was directed by the MVEIRB to Indian and Northern Affairs Canada. Preparing the response to this Information Request is the responsibility of Indian and Northern Affairs Canada.

Imperial Response - IR 2.4A (MVEIRB)

Application Name: 2004 Winter Field Geotechnical Investigation Program in the Deh Cho Region

Document Reference: Developer's Assessment Report

Request From: Deh Cho First Nations - Pipeline Working Group

Regulatory Agency Reference: 4A

DAR Section: 2.1 Public Involvement

ToR Section: F-1 Methods and Issues

Imperial Reference: DAR IR 2.4A (MVEIRB)

INFORMATION REQUEST:

2.4 A In Table 2-1, Imperial explains that individuals from Pehdzeh Ki, Liidlil Kue and Sambaa K'e were used in the field for project planning.

- Please provide the following information:
 - Explain why no individuals were used from the Jean Marie River First Nation or Ka'a'Gee Tu First Nation.

RESPONSE:

The Band Council of Jean Marie River First Nation was offered the opportunity to participate in the 2003 summer reconnaissance work used for planning the Program. They chose not to participate in the 2003 summer reconnaissance work.

Elders from the Ka'a'Gee Tu First Nation were involved in the 2003 summer reconnaissance work near Sambaa K'e.

Imperial Response - IR 2.4B (MVEIRB)

Application Name: 2004 Winter Field Geotechnical Investigation Program in the Deh Cho Region

Document Reference: Developer's Assessment Report

Request From: Deh Cho First Nations - Pipeline Working Group

Regulatory Agency Reference: 4B

DAR Section: 2.1 Public Involvement

ToR Section: F-1 Methods and Issues

Imperial Reference: DAR IR 2.4B (MVEIRB)

INFORMATION REQUEST:

2.4 B In Table 2-1, Imperial explains that individuals from Pehdzeh Ki, Liidlil Kue and Samba K'e were used in the field for project planning.

- Please provide the following information:
 - Identify which proposed project locations and access routes in the land use area of these 2 communities were selected without their involvement.

RESPONSE:

The following proposed sites are located in the Jean Marie River First Nation traditional land use area:

- 11.192P
- 11.204PA
- 11.204PB
- 20.057P

As mentioned in the response to IR 2.4A, the Jean Marie River First Nation was offered the opportunity to participate in the selection of sites and access routes in their traditional land use area. As well, information regarding Imperial's selection of the sites and access routes was offered to the Jean Marie River First Nation. The Jean Marie River First Nation chose not to receive this information.

As described in the response to IR 2.4A, the Ka'a'Gee First Nation did participate in the selection of sites and access routes in the traditional land use area.

Imperial Response - IR 2.4C (MVEIRB)

Application Name: 2004 Winter Field Geotechnical Investigation Program in the Deh Cho Region

Document Reference: Developer's Assessment Report

Request From: Deh Cho First Nations - Pipeline Working Group

Regulatory Agency Reference: 4C

DAR Section: 2.1 Public Involvement

ToR Section: F-1 Methods and Issues

Imperial Reference: DAR IR 2.4C (MVEIRB)

INFORMATION REQUEST:

2.4C In Table 2-1, Imperial explains that individuals from Pehdzeh Ki, Liidlil Kue and Sambaa K'e were used in the field for project planning.

- Please provide the following information:
 - Explain what Imperial Oil has and/or will do to address this problem.

RESPONSE:

Imperial has described the opportunities provided to the communities to participate in the planning for the Program in the responses to IR 2.4A and IR 2.4C.

Imperial is not aware of any problem in this regard.

Imperial Response - IR 2.5 (MVEIRB)

Application Name: 2004 Winter Field Geotechnical Investigation Program in the Deh Cho Region

Document Reference: Developer's Assessment Report

Request From: Deh Cho First Nations - Pipeline Working Group

Regulatory Agency Reference: 5

DAR Section: 2.1 Public Involvement

ToR Section: F-1 Methods and Issues

Imperial Reference: DAR IR 2.5 (MVEIRB)

INFORMATION REQUEST:

2.5 In Table 2-1, Imperial states that bid evaluations will have a specific component concerning northern benefits.

- Please provide the bid evaluation criteria and criteria weighting.

RESPONSE:

The specifics of Imperial's commitment to northern contractors are found throughout the procurement process. The procurement process begins with prequalification, where advertisements are only placed in the Northwest Territories newspapers. From the northern companies that express an interest in the work, a bid list is generated based on their ability to meet the minimum requirements of the pre-qualification process.

The bid evaluation criteria focuses on safety, quality, cost and schedule. The weighing of these criteria varies based on the scope of work being bid and evaluated. The final determination on contract awards is based on consideration of northern and aboriginal content. The weightings used by Imperial in bid evaluation are confidential, however the bid evaluation criteria are all provided to prospective bidders.

Imperial Response - IR 2.6 (MVEIRB)

Application Name: 2004 Winter Field Geotechnical Investigation Program in the Deh Cho Region

Document Reference: Developer's Assessment Report

Request From: Deh Cho First Nations - Pipeline Working Group

Regulatory Agency Reference: 6

DAR Section: 2.1 Public Involvement

ToR Section: F-1 Methods and Issues

Imperial Reference: DAR IR 2.6 (MVEIRB)

INFORMATION REQUEST:

2.6 In Table 2-1, Imperial states that standard Imperial contract procurement practices would be followed.

- Please explain these standard Imperial contract procurement practices and provide additional rationale as to why Imperial refuses to deviate from them to accommodate community concerns.

RESPONSE:

Imperial has developed a set of procurement practices that ensure that all contractors being considered for work are treated fairly and equitably. These practices are entrenched in all procurement activities from the development of contracting strategies to contract award.

The specific actions which Imperial has taken to accommodate community concerns in the Deh Cho Region include:

- Breaking down work scopes into smaller packages to allow local companies greater access to the opportunity
- Restricting bid lists to Deh Cho Region businesses (including joint venture businesses) when there are at least two businesses that can supply the required goods or services
- Advertising the work scope and pre-qualification opportunities only in Northern papers
- Giving preference to businesses in the Deh Cho Region, with priority to Deh Cho corridor businesses in all bid evaluations

Procurement practices of ColtKBR, the prime contractor responsible for contracting of the Program, have been reviewed to ensure their practices meet the standards and expectations of Imperial.

Imperial Response - IR 2.7 (MVEIRB)

Application Name: 2004 Winter Field Geotechnical Investigation Program in the Deh Cho Region

Document Reference: Developer's Assessment Report

Request From: Deh Cho First Nations - Pipeline Working Group

Regulatory Agency Reference: 7

DAR Section: 2.1 Public Involvement

ToR Section: F-1 Methods and Issues

Imperial Reference: DAR IR 2.7 (MVEIRB)

INFORMATION REQUEST:

2.7 In Table 2-1, Imperial states that it would evaluate options for the control and direction of the local environmental monitors.

- Please describe the options that Imperial has developed and considered. Identify whether or not the options are acceptable or unacceptable to Imperial and explain why. Identify Imperial's preferred option.

RESPONSE:

Imperial proposes to use the same approach for the involvement of Local Environmental and Wildlife Monitors in the Program as has been used in similar programs in other regions. The local Environment and Wildlife Monitors are hired by and are responsible to their community organizations. The communities bill ColtKBR for these services according to an agreed set of terms. Local Environment and Wildlife Monitors are not controlled or directed by Imperial or ColtKBR. The responsibilities of the local Environment and Wildlife Monitors are outlined in the Environmental Protection Plan, which was filed with the Land Use Permit application.

Imperial Response - IR 2.8A (MVEIRB)

Application Name: 2004 Winter Field Geotechnical Investigation Program in the Deh Cho Region

Document Reference: Developer's Assessment Report

Request From: Deh Cho First Nations - Pipeline Working Group

Regulatory Agency Reference: 8A

DAR Section: 3.1 Table 3-1

ToR Section: G-1 and G-2

Imperial Reference: DAR IR 2.8A (MVEIRB)

INFORMATION REQUEST:

2.8A In Table 3-1, Imperial Oil explains the EA criteria and ratings that it used in the DAR.

For Duration, Long-Term extends to 10 years but Far Future doesn't start until 30 years.

For Frequency, Imperial includes the phrase "during program" for all three ratings. Limiting the ratings to "during program" is inconsistent with the Duration ratings, which recognize that the duration of the impacts can extend well beyond the duration of the program.

Imperial used 50 years as the time frame for rating impacts as either Reversible or Irreversible.

In assessing Significance, Imperial only considered 3 criteria (magnitude, geographic extent and duration) of the 8 criteria that are listed in the table.

- Please provide the following information:
 - Explain whether an impact of duration 11 to 29 years would be rated as Long-Term or Far Future.
-

RESPONSE:

In Table 3-1 of the Developer's Assessment Report, "Long-term" should have been listed as from 1 to 30 years instead of 1 to 10 years.

Imperial Response - IR 2.8B (MVEIRB)

Application Name: 2004 Winter Field Geotechnical Investigation Program in the Deh Cho Region

Document Reference: Developer's Assessment Report

Request From: Deh Cho First Nations - Pipeline Working Group

Regulatory Agency Reference: 8B

DAR Section: 3.1 Table 3-1

ToR Section: G-1 and G-2

Imperial Reference: DAR IR 2.8B (MVEIRB)

INFORMATION REQUEST:

2.8B In Table 3-1, Imperial Oil explains the EA criteria and ratings that it used in the DAR.

For Duration, Long-Term extends to 10 years but Far Future doesn't start until 30 years.

For Frequency, Imperial includes the phrase "during program" for all three ratings. Limiting the ratings to "during program" is inconsistent with the Duration ratings, which recognize that the duration of the impacts can extend well beyond the duration of the program.

Imperial used 50 years as the time frame for rating impacts as either Reversible or Irreversible.

In assessing Significance, Imperial only considered 3 criteria (magnitude, geographic extent and duration) of the 8 criteria that are listed in the table.

- Please provide the following information:
 - Does Imperial agree that the phrase "during program" should be deleted from the 3 ratings under Frequency? If no, explain why.

RESPONSE:

Imperial believes that the phrase "during program" is correct in the three ratings under Frequency. The Duration attribute describes the length of time that the effect of an impact occur whereas the Frequency attribute describes how often an impact might occur.

A potential effect of the Program on moose could be as a result of sensory disturbance from noise at a camp. The Frequency would be rated as High because the noise occurs continuously at the camp during the Program. The Duration would be rated as short-term because the effects from noise only occur during the Program.

Imperial Response - IR 2.8C (MVEIRB)

Application Name: 2004 Winter Field Geotechnical Investigation Program in the Deh Cho Region

Document Reference: Developer's Assessment Report

Request From: Deh Cho First Nations - Pipeline Working Group

Regulatory Agency Reference: 8C

DAR Section: 3.1 Table 3-1

ToR Section: G-1 and G-2

Imperial Reference: DAR IR 2.8C (MVEIRB)

INFORMATION REQUEST:

2.8C In Table 3-1, Imperial Oil explains the EA criteria and ratings that it used in the DAR.

For Duration, Long-Term extends to 10 years but Far Future doesn't start until 30 years.

For Frequency, Imperial includes the phrase "during program" for all three ratings. Limiting the ratings to "during program" is inconsistent with the Duration ratings, which recognize that the duration of the impacts can extend well beyond the duration of the program.

Imperial used 50 years as the time frame for rating impacts as either Reversible or Irreversible.

In assessing Significance, Imperial only considered 3 criteria (magnitude, geographic extent and duration) of the 8 criteria that are listed in the table.

- Please provide the following information:
 - Explain why Imperial used 50 years as the threshold for rating reversibility instead of the 30 year time period used for the Far Future rating under Duration.

RESPONSE:

Effects on vegetation might require up to 50 years to return to pre-disturbance conditions.

Imperial Response - IR 2.8D (MVEIRB)

Application Name: 2004 Winter Field Geotechnical Investigation Program in the Deh Cho Region

Document Reference: Developer's Assessment Report

Request From: Deh Cho First Nations - Pipeline Working Group

Regulatory Agency Reference: 8D

DAR Section: 3.1 Table 3-1

ToR Section: G-1 and G-2

Imperial Reference: DAR IR 1.8D (MVEIRB)

INFORMATION REQUEST:

1.8D In Table 3-1, Imperial Oil explains the EA criteria and ratings that it used in the DAR.

For Duration, Long-Term extends to 10 years but Far Future doesn't start until 30 years.

For Frequency, Imperial includes the phrase "during program" for all three ratings. Limiting the ratings to "during program" is inconsistent with the Duration ratings, which recognize that the duration of the impacts can extend well beyond the duration of the program.

Imperial used 50 years as the time frame for rating impacts as either Reversible or Irreversible.

In assessing Significance, Imperial only considered 3 criteria (magnitude, geographic extent and duration) of the 8 criteria that are listed in the table.

- Please provide the following information:
 - Explain why Imperial only considered 3 of the 8 EA criteria when assessing significance.

RESPONSE:

The environmental assessment considered all of the effects attributes listed in Table 3-1 of the Developer's Assessment Report. The primary attributes used were Magnitude, Geographic Extent, and Duration. The Direction attribute is straight forward and was considered but not stated explicitly. Attributes that support the primary attributes included Probability, Reversibility and Confidence. Environmental assessment findings are presented under the primary effects attributes to simplify and assist in clarifying the effects.

Imperial Response - IR 2.9 (MVEIRB)

Application Name: 2004 Winter Field Geotechnical Investigation Program in the Deh Cho Region

Document Reference: Developer's Assessment Report

Request From: Dehcho First Nations - Pipeline Working Group

Regulatory Agency Reference: 9

DAR Section: 4.2 – Vegetation, Rare Plants and Sections 5.1, 5.2 and 5.3

ToR Section: no reference

Imperial Reference: DAR IR 2.9 (MVEIRB)

INFORMATION REQUEST:

2.9 In Section 4.1, Imperial states: "Areas that might be affected by the program will be surveyed for the presence of rare plants and vegetation communities of concern before execution of the program. Using a precautionary approach, mitigation will be applied to reduce or avoid effects where possible."

In Sections 5.1, 5.2 and 5.3, Imperial repeatedly refers to 2004 vegetation and rare plant surveys. The PWG expects that these surveys should have been completed by now.

- Please provide the following information:
 - Please describe the vegetation and rare plant surveys (methodology and activities) that have been completed by Imperial, provide the results of these surveys and identify any mitigation measures that have been developed and will be applied during the completion of the project.
-

RESPONSE:

Two types of surveys were conducted:

- Vegetation surveys designed to assist in mapping and describing dominant vegetation types
- rare plant surveys designed to identify smaller uncommon vegetation communities and rare plant species.

Survey Methods:

1. Vegetation Survey:

Vegetation surveys were guided by the British Columbia Terrestrial Ecosystem Mapping inventory standards for 1:20,000 scale mapping (Resource Inventory Committee [RIC] 1998). This system was developed to provide a uniform method, i.e. using an ecological land classification approach for describing vegetation, soil and terrain characteristics based on aerial photograph interpretation and field data collection. These guidelines provide a previously evaluated system of designing a sampling strategy that is scientifically accurate and efficient, particularly for collecting data in remote locations with limited access (RIC 1998). The field-sampling program included detailed plots, ground inspections and visual checks. Each was conducted within a homogeneous area of vegetation within or near the proposed site of interest.

Detailed Plots

Detailed plots provided the most comprehensive vegetation data for an area. Detailed plot sites were set up as 20 m x 20 m plots in homogeneous vegetation, at least 20 m away from any

disturbance or edge to avoid edge effects. Plots were selected within reasonably uniform vegetation types with a size of at least 1 ha where possible.

Tree Layer

The following was recorded, where relevant, for the tree layer of the plot, within the canopy and subcanopy:

- all tree species
- percent cover
- average height
- average age (coniferous trees only)
- average diameter at breast height (DBH)

For measuring diameter at breast height (DBH), height and age for both the canopy and subcanopy, one representative individual that reflected the average for each layer at the site was used. A tree core from the representative individual was obtained using an incremental tree corer. The core was collected at breast height and later sanded and the tree rings counted.

Shrub Layer

In the shrub layer, percent cover and average height were recorded for each shrub species. Species recorded in the shrub layer included all woody plants greater than 20 cm tall. Two height classes were distinguished:

- low shrubs – between 20 cm and 150 cm tall
- tall shrubs – greater than 150 cm tall and less than 5 m tall

For a shrub species occupying multiple layers, percent cover and average height were estimated for both shrub layers separately.

Ground Cover Layer

Ground cover layer data was collected on a 20 m transect set up through the centre of the detailed plot. Ten microplots, of 1 m x 1 m each, for the taiga forest ecological zones were sampled along the transect. In each microplot, botanists recorded species and estimated a percent cover of each plant for all vascular vegetation less than or equal to 20 cm, including: tree species, shrub species, grasses, sedges, rushes, and forbs.

Total percent surface cover of vascular plants, nonvascular plants, i.e.. bryophytes and lichens, litter, bare ground and water were also estimated for each microplot.

Vascular and nonvascular specimens that could not be identified in the field were collected for later identification, given sufficient population size (i.e. more than 20 plants were observed).

Site Parameters

Data on moisture and nutrient regime, soils and terrain was also collected. The site was assigned a vegetation type and marked on the field atlas, once all of the information was recorded. A global positioning system (GPS) location was recorded and photographs were taken of every site.

Ground Inspections

Ground inspections provided basic ecological data and were used to confirm identified vegetation types.

Vegetation data on the tree layer, shrub layer and site parameters in ground inspections was collected in the same manner as that of detailed plots.

Ground cover layer data was collected within the 20 m x 20 m plot used to assess tree and shrub cover. Ground cover included all vascular vegetation species less than or equal to 20 cm tall, including tree species, shrub species and other vascular plants. Vascular and nonvascular specimens that could not be identified in the field were collected for later identification, given sufficient population size (i.e., more than 20 plants observed).

Total percent surface cover of vascular plants, nonvascular plants, litter, bare ground and water were estimated for the entire 20 m x 20 m plot.

Visual Checks

Visual checks were the least detailed type of field data collection. They were performed to collect additional vegetation cover information to verify the accuracy of the map data. Visual checks were conducted from a helicopter or on the ground.

2. Rare Plant Surveys:

Rare plant surveys of the Program sites focused on fine-scale landscape features and small patch vegetation communities within the proposed footprint with the potential to support rare plant species and rare associations. These are not usually mapable, using the available 1:30,000 air photos. Areas representative of typical vegetation types were also surveyed, but not as intensively.

At each survey site, the survey team walked through the search area and recorded all observed vascular plant species, until no new species were observed. Species unidentifiable in the field were collected given sufficient population size (i.e. more than 20 plants were observed) and were identified later. Nonvascular species were recorded. Dominant species were collected and sent for identification by a nonvascular specialist. The vegetation association, terrain features and habitat and soil characteristics of the survey site were also recorded. All survey locations were identified using a handheld GPS unit.

Where rare plants were found, photographs were taken of the plants, habitat and site. Samples were collected where populations were sufficient; a maximum of one plant in every 20 individuals.

Potential rare plant species were identified using information from Rare Vascular Plants in the Northwest Territories (McJannet et al. 1995).

Results:

Sixty-three of the sixty-nine proposed Program sites were surveyed and the results are summarized in Table 9-1. Vegetation mapping surveys were conducted at fifty-six sites, and rare plant surveys were conducted at thirty-one sites. Rare plant surveys were not conducted at most of the sites north of Willow Lake River since access agreements were not in place in time to conduct the work. Some sites were surveyed in previous years. Rare plant surveys of site 20.066P could not be conducted due to a lack of safe landing access.

Uncommon and sensitive vegetation types and smaller communities were recorded at 37 of the proposed sites as shown in attached Table 9-1. Uncommon vegetation types and communities consisted of:

- stands of mature tall forest, uncommon in the region due to frequent forest fires and limited growing conditions in most areas;
- riparian willow, only found along the banks of rivers;
- riparian willow – red osier dogwood, only found along the banks of creeks and rivers;
- plant communities associated with springs;
- grasslands, only recorded at three locations in the Program study area.

Sensitive vegetation types and communities include:

- black spruce / cloudberry – lichen bog and leatherleaf / bog rosemary – peat moss bog, vulnerable to Program disturbance, because of the limited ability of vegetation to recover from disturbance effects and instability of permafrost in the region; and
- graminoid fens, which tend to be species rich and support a high number of unique species.

Twelve rare plant species were recorded in ten sites shown in Table 9-1:

- broad-leaved water-plantain (*Alisma triviale*)
- Indian hemp (*Apocynum cannabinum*)
- narrow sedge (*Carex arcta*)
- poverty oat grass (*Danthonia spicata*)
- Canada wild rye (*Elymus canadensis*)
- linear-leaved willowherb (*Epilobium leptophyllum*)
- prairie gentian (*Gentiana affinis*)
- round-leaved orchid (*Platanthera orbiculata*)
- Rolland's bulrush (*Scirpus rollandii*)
- flat-top fragrant golden rod (*Solidago graminifolia* var. *graminifolia*)
- alkali cordgrass (*Spartina gracilis*)

An additional two species, pondweed species (*Potamogeton natans* and *Potamogeton obtusifolius*), were recorded in the vicinity of site 11.005PB, and may also be impacted. These species occur in a wetland south of the proposed borrow pit. Development of the pit may impact the hydrology and alter the water levels of the wetland and change the conditions these species require. The majority of the rare species were found at proposed river crossings, mainly at Willow Lake River, River Between Two Mountains and Mackenzie River.

Non-native invasive species (weeds) were recorded at three sites: Mackenzie River crossing, Willow Lake River crossing and adjacent to 11.055PB. Species recorded consist of foxtail barley (*Hordueum jubatum*), white sweetclover (*Melilotus alba*), black medic (*Medicago lupulina*) and reed canarygrass (*Phalaris arundinacea*). The greatest abundance and number of invasive species was recorded adjacent to site 11.055PB, in an existing clearing directly east of the proposed footprint. All four invasive species were recorded at this location.

All the rare species observed are classified as peripherally rare species with one exception. Peripheral species are at the edge of their range in the territory but are widespread, with secure populations in other regions. There is one Nationally rare species, dwarf clubrush, present on the Smith Creek crossing. None of these species are recorded in Canada's Species at Risk legislation.

Table 9-1: Vegetation and Rare Plant Survey results for 2005 winter geotechnical sites

Site ID	Activity Type	Vegetation Survey (Y/N)	Rare Plant Survey (Y/N)	Uncommon Vegetation Type/Community	Sensitive Vegetation Type/Community	Rare Species Recorded ¹	Weed Species Recorded
10.001P	Borrow	Y	N	None	None	None	None
10.003P	Borrow	Y	N	None	None	None	None
10.004P	Borrow	Y	N	None	None	None	None
10.007P	Borrow	Y	N	None	graminoid fen	None	None
10.013P	Borrow	Y	N	None	black spruce / cloudberry – lichen bog and leatherleaf / bog rosemary – peat moss bog	None	None
10.014AP	Borrow	Y	N	None	None	None	None
10.020P ²	Borrow	Y	Y	None	None	None	None
10.022P	Borrow	Y	N	None	None	None	None
10.030P	Borrow	Y	N	None	None	None	None
10.033P	Borrow	Y	N	tall forest	None	None	None
10.037P	Borrow	Y	N	None	None	None	None
10.038PA	Borrow	Y	N	None	None	None	None
10.043P	Borrow	Y	N	tall forest	None	None	None
10.044BP	Borrow	Y	N	tall forest	None	None	None
10.055P	Borrow	Y	N	None	None	None	None
10.071P	Borrow	Y	N	None	None	None	None
10.072P	Borrow	Y	N	tall forest	None	None	None
10.120P	Borrow	Y	N	tall forest	None	None	None
11.019P	Borrow	Y	Y	None	None	None	None
11.021P	Borrow	Y	Y	riparian willow	None	None	None
11.033P	Borrow	Y	Y	tall forest, riparian willow	None	None	None
11.055PA	Borrow	N	Y	None	None	None	None

Site ID	Activity Type	Vegetation Survey (Y/N)	Rare Plant Survey (Y/N)	Uncommon Vegetation Type/Community	Sensitive Vegetation Type/Community	Rare Species Recorded ¹	Weed Species Recorded
11.055PB ³	Borrow	Y	Y	None	None	<i>Platanthera orbiculata</i> , <i>Potamogeton natans</i> <i>Potamogeton obtusifolius</i>	<i>Hordeum jubatum</i> , <i>Melilotus alba</i> , <i>Medicago lupulina</i> , <i>Phalaris arundinacea</i>
11.067P	Borrow	N	Y	None	None	None	None
11.071P	Borrow	Y	Y	None	None	None	None
11.174P	Borrow	Y	Y	None	None	None	None
11.192P	Borrow	Y	Y	tall forest	None	<i>Platanthera orbiculata</i>	None
11.204PA	Borrow	Y	Y	tall forest	leatherleaf / bog rosemary – peat moss bog	None	None
11.204PB	Borrow	Y	Y	None	None	None	None
20.002P	Borrow	N	N	None	None	None	None
20.003P	Borrow	N	N	None	None	None	None
20.004PA	Borrow	Y	Y	None	None	<i>Epilobium leptophyllum</i>	None
20.004PB	Borrow	Y	Y	None	None	None	None
20.006P	Borrow	Y	N	None	None	None	None
20.008P	Borrow	Y	N	tall forest	None	None	None
20.015P	Borrow	Y	Y	None	None	None	None
20.018P	Borrow	Y	Y	None	None	<i>Platanthera orbiculata</i>	None
20.057P	Borrow	Y	Y	None	None	None	None
20.064P	Borrow	Y	Y	grassland	None	<i>Carex acuta</i>	None
20.066P	Borrow	Y	N	None	black spruce / cloudberry – lichen bog	None	None

Site ID	Activity Type	Vegetation Survey (Y/N)	Rare Plant Survey (Y/N)	Uncommon Vegetation Type/Community	Sensitive Vegetation Type/Community	Rare Species Recorded ¹	Weed Species Recorded
20.068P	Borrow	Y	Y	tall forest	black spruce / cloudberry – lichen bog and leatherleaf / bog rosemary – peat moss bog	None	None
9.038PA	Borrow	Y	N	None	None	None	None
9.038PB	Borrow	Y	N	None	None	None	None
9.044PA	Borrow	Y	N	tall forest	None	None	None
9.044PB	Borrow	Y	N	None	None	None	None
9.091P	Borrow	Y	N	tall forest	None	None	None
FH 17	Frost Heave	Y	N	None	None	None	None
FH 18	Frost Heave	N	N	None	None	None	None
FH 20	Frost Heave	N	Y	None	None	<i>Carex arctica</i>	None
FH 21	Frost Heave	N	Y	None	None	None	None
FH 22	Frost Heave	N	N	None	None	None	None
FH12	Frost Heave	Y	N	None	None	None	None
FH13	Frost Heave	Y	N	None	None	None	None
FH14	Frost Heave	Y	N	None	None	None	None
FH15	Frost Heave	N	Y	None	None	None	None
FH16	Frost Heave	Y	N	None	None	None	None
Blackwater River	Crossing	Y	Y	None	None	<i>Gentiana affinis</i>	None
Blackwater River Camp	Camp	Y	N	None	None	None	None
Fort Simpson Camp	Camp			None	None	None	None
Mackenzie River	Crossing	N	Y	None	None	<i>Apocynum cannabinum</i> , <i>Danthonia spicata</i> , <i>Solidago graminifolia</i> var. <i>graminifolia</i> , <i>Spartina gracilis</i>	<i>Phalaris arundinacea</i>
Ochre River	Crossing	Y	Y	None	None	None	None

Site ID	Activity Type	Vegetation Survey (Y/N)	Rare Plant Survey (Y/N)	Uncommon Vegetation Type/Community	Sensitive Vegetation Type/Community	Rare Species Recorded ¹	Weed Species Recorded
River Between Two Mountains	Crossing	Y	Y	tall forest	None	<i>Apocynum cannabinum</i> , <i>Danthonia spicata</i> , <i>Gentiana affinis</i>	None
Smith Creek	Crossing	Y	Y	riparian willow	None	<i>Scirpus rollandii</i>	None
Trout Lake Road Camp	Camp	Y	Y	None	None	None	None
Trout River	Crossing	N	Y	None	None	None	None
White Sands Creek	Crossing	Y	N	spring community tall forest	None	None	None
Willowlake River	Crossing	Y	Y	riparian willow – red osier dogwood	None	<i>Alisma triviale</i> , <i>Apocynum cannabinum</i> , <i>Elymus canadensis</i> , <i>Solidago graminifolia</i> var. <i>gracilis</i>	<i>Hordueum jubatum</i>
Willowlake River Camp	Camp	Y	Y	None	None	None	None
Wrigley Camp	Camp	N	N	None	None	None	None

Note: 1. Awaiting confirmation on species identification.

2. Survey done in the vicinity in similar vegetation type.

3. Pondweed species (*Potamogeton natans* and *Potamogeton obtusifolius*), recorded in the vicinity of site 11.005PB and may potentially be impacted by site development.

NOTE: Rare species are defined as peripherally rare and are geographic extensions of range. These species are not listed under Canada's Species at Risk legislation.

Mitigation:

Areas of uncommon or sensitive vegetation types and communities will be avoided, where possible. Impacts will be minimized in areas that cannot be avoided using the following techniques:

- restricting activities to winter;
- hand cutting trees and shrubs in sensitive areas and along stream buffers;
- construction of snow ramps or ice bridges to protect the bases of the shrubs in riparian areas;
- snow or ice road buffers in bogs;
- Reduce grading and levelling to that required to prepare a safe and efficient working surface;

Known rare plant locations will be avoided and locations buffered by a 30 m radius where possible. Where this is not possible i.e., river crossings where the data collected indicates extensive populations along riverbanks, some plants may be lost. However, impacts will be reduced by restricting activities to winter and minimizing the areas disturbed. Populations also appear to occur elsewhere along the riverbanks and impacts should therefore, not result in the elimination of any species from an area.

The nationally rare plant, dwarf clubrush, is found in a small rich fen fed by a warm spring in the Smith Creek valley. This site will be avoided by a buffer of 30m from the edge of the rich fen. The additional mitigation measures outlined in the preceding paragraph will further buffer effects to this site.

Equipment will be cleaned prior to entering undisturbed areas. This should reduce the likelihood of introducing new invasive species to these areas. Operating on snow cover will also reduce potential for spread of non-native invasive plants currently present on sites. However, weed species from existing on site or nearby populations may invade disturbed areas, particularly at river crossings and site 11.055PB.

References:

Resource Inventory Committee (RIC). 1998. Standards for Terrestrial Ecosystem Mapping in British Columbia. Victoria, BC.

McJannet, C.L., G.W. Argus, W.J. Cody. 1995. Rare Vascular Plants in the Northwest Territories. Canadian Museum of Nature. Syllogens 33.

Imperial Response - IR 2.10A (MVEIRB)

Application Name: 2004 Winter Field Geotechnical Investigation Program in the Deh Cho Region

Document Reference: Developer's Assessment Report

Request From: Deh Cho First Nations - Pipeline Working Group

Regulatory Agency Reference: 10A

DAR Section: 5.1, Primary Access Review Board IR 1.4C

ToR Section: no reference

Imperial Reference: DAR IR 2.10A (MVEIRB)

INFORMATION REQUEST:

2.10A Imperial identifies 3 public roads as primary access routes for this project: the Mackenzie Highway, the Mackenzie Highway winter road north of Wrigley and the Trout Lake Winter Road.

Imperial states that the primary access winter roads (Mackenzie Highway north of Wrigley and the Trout Lake Winter Road) "will likely require additional maintenance as a result of increased vehicle and equipment costs".

In its response to Review Board IR 1.4C, Imperial says that reduced speed limit signs will be posted along the Mackenzie Highway in the vicinity of the camp and the community of Wrigley. However, Imperial Oil does not explain under what authority it will be changing the speed limit on a public road.

The Mackenzie Highway and the two winter roads are constructed and maintained by the GNWT's Department of Transportation.

- Please provide the following information:
 - Describe and provide any agreements between Imperial Oil and the GNWT regarding the construction, use, upgrading and/or maintenance of the Mackenzie Highway and the 2 winter roads due to this project.
-

RESPONSE:

This information request was directed by the MVEIRB to both Imperial and the Government of the Northwest Territories. The response by Imperial is as follows:

There are no agreements in place at this time between Imperial and the Government of the Northwest Territories – Department of Transportation regarding construction, use, upgrading or maintenance of the three highway corridors associated with the Program. Imperial understands that there might be two levels of maintenance programs by the Government of the Northwest Territories - Department of Transportation. One will be normal maintenance and the other might address maintenance resulting from additional use of the Winter Road as a result of Program activities. Imperial will work closely with the Government of the Northwest Territories – Department of Transportation and the approved Department of Transportation local contractor, to ensure that the roads are maintained to a standard which ensures that Program related traffic does not hinder use of the road by the public.

Imperial Response - IR 2.10B (MVEIRB)

Application Name: 2004 Winter Field Geotechnical Investigation Program in the Deh Cho Region

Document Reference: Developer's Assessment Report

Request From: Deh Cho First Nations - Pipeline Working Group

Regulatory Agency Reference: 10B

DAR Section: Section 5.1, Primary Access Review Board IR 1.4C

ToR Section: no reference

Imperial Reference: DAR IR 2.10B (MVEIRB)

INFORMATION REQUEST:

2.10B Imperial identifies 3 public roads as primary access routes for this project: the Mackenzie Highway, the Mackenzie Highway winter road north of Wrigley and the Trout Lake Winter Road.

Imperial states that the primary access winter roads (Mackenzie Highway north of Wrigley and the Trout Lake Winter Road) "will likely require additional maintenance as a result of increased vehicle and equipment costs"

In its response to Review Board IR 1.4C, Imperial says that reduced speed limit signs will be posted along the Mackenzie Highway in the vicinity of the camp and the community of Wrigley. However, Imperial Oil does not explain under what authority it will be changing the speed limit on a public road.

The Mackenzie Highway and the two winter roads are constructed and maintained by the GNWT's Department of Transportation.

- Please provide the following information:
 - Describe the upgrades and maintenance expected for each of these 3 access routes, including associated costs, due to this project. Please discuss how the forest fire this summer could impact the construction and maintenance of the Trout Lake Winter Road. Also, please discuss how increased construction and maintenance costs will impact the Samba K'e Development Corporation given that it has a fixed value contract with the Government of the Northwest Territories – Department of Transportation for the construction and maintenance of the Trout Lake Winter Road. (Imperial/Government of the Northwest Territories – Department of Transportation).
-

RESPONSE:

This information request was directed by the MVEIRB to both Imperial and the Government of the Northwest Territories. The response by Imperial is as follows:

Imperial will work closely with the Government of the Northwest Territories – Department of Transportation and with their local contractor to ensure roads utilized for Program related activities are upgraded and maintained to accommodate normal traffic flow.

Imperial Response - IR 2.10C (MVEIRB)

Application Name: 2004 Winter Field Geotechnical Investigation Program in the Deh Cho Region

Document Reference: Developer's Assessment Report

Request From: Deh Cho First Nations - Pipeline Working Group

Regulatory Agency Reference: 10C

DAR Section: Section 5.1, Primary Access Review Board IR 1.4C

ToR Section: no reference

Imperial Reference: DAR IR 2.10C (MVEIRB)

INFORMATION REQUEST:

2.10C Imperial identifies 3 public roads as primary access routes for this project: the Mackenzie Highway, the Mackenzie Highway winter road north of Wrigley and the Trout Lake Winter Road

Imperial states that the primary access winter roads (Mackenzie Highway north of Wrigley and the Trout Lake Winter Road) "will likely require additional maintenance as a result of increased vehicle and equipment costs"

In its response to Review Board IR 1.4C, Imperial says that reduced speed limit signs will be posted along the Mackenzie Highway in the vicinity of the camp and the community of Wrigley. However, Imperial Oil does not explain under what authority it will be changing the speed limit on a public road.

The Mackenzie Highway and the two winter roads are constructed and maintained by the GNWT's Department of Transportation.

- Please provide the following information:
 - Identify any unrecoverable costs (including construction, operation, maintenance and closure costs to the GNWT as a result of the increased use and maintenance of each of these 3 roads. (GNWT)

RESPONSE:

This Information Request was directed by the MVEIRB to Indian and Northern Affairs Canada. Preparing the response to this Information Request is the responsibility of Indian and Northern Affairs Canada.

Imperial Response - IR 2.10D (MVEIRB)

Application Name: 2004 Winter Field Geotechnical Investigation Program in the Deh Cho Region

Document Reference: Developer's Assessment Report

Request From: Deh Cho First Nations - Pipeline Working Group

Regulatory Agency Reference: 10D

DAR Section: Section 5.1, Primary Access Review Board IR 1.4C

ToR Section: no reference

Imperial Reference: DAR IR 2.10D (MVEIRB)

INFORMATION REQUEST:

2.10D Imperial identifies 3 public roads as primary access routes for this project: the Mackenzie Highway, the Mackenzie Highway winter road north of Wrigley and the Trout Lake Winter Road

Imperial states that the primary access winter roads (Mackenzie Highway north of Wrigley and the Trout Lake Winter Road) "will likely require additional maintenance as a result of increased vehicle and equipment costs"

In its response to Review Board IR 1.4C, Imperial says that reduced speed limit signs will be posted along the Mackenzie Highway in the vicinity of the camp and the community of Wrigley. However, Imperial Oil does not explain under what authority it will be changing the speed limit on a public road.

The Mackenzie Highway and the two winter roads are constructed and maintained by the GNWT's Department of Transportation.

- Please provide the following information:
 - Explain under what authority the speed limits on the Mackenzie Highway will be changed near the Wrigley camp. (Imperial/GNWT).

RESPONSE:

This Information Request was directed by the MVEIRB to Indian and Northern Affairs Canada. Preparing the response to this Information Request is the responsibility of Indian and Northern Affairs Canada.

Imperial Response - IR 2.11 (MVEIRB)

Application Name: 2004 Winter Field Geotechnical Investigation Program in the Deh Cho Region

Document Reference: Developer's Assessment Report

Request From: Deh Cho First Nations - Pipeline Working Group

Regulatory Agency Reference: 11

DAR Section: 5.1, Fuel Supplies for Program Equipment; 9.1, Economic Impacts and Mitigation

ToR Section: no reference

Imperial Reference: DAR IR 2.11 (MVEIRB)

INFORMATION REQUEST:

2.11 In Section 5.1, Imperial states that: "Fuel trucks from Fort Simpson and Wrigley will provide fuel to the temporary rig camps along the Mackenzie Highway and existing winter roads."

Imperial Oil states that access to Fort Simpson will be restricted to camp supply contractors, including fuel and food suppliers.

- Please provide additional information regarding the project re-supply process. The information should be sufficiently detailed to allow the following question to be answered: Could this project have a negative impact upon the distribution and availability of fuel, food or other supplies within Fort Simpson or the other PWG communities?

RESPONSE:

Imperial will ensure the re-supply of fuel, food, parts or other supplies will be from southern locations if it is determined that re-supply from the local sources will negatively affect local residents.

The preference of Imperial is to provide supplies for Program activities from local sources whenever it is deemed to be a local benefit.

Imperial Response - IR 2.12A (MVEIRB)

Application Name: 2004 Winter Field Geotechnical Investigation Program in the Deh Cho Region

Document Reference: Developer's Assessment Report

Request From: Deh Cho First Nations - Pipeline Working Group

Regulatory Agency Reference: 12A

DAR Section: 5.1, Access

ToR Section: no reference

Imperial Reference: DAR IR 2.12A (MVEIRB)

INFORMATION REQUEST:

2.12A Imperial identifies 3 public roads as primary access routes for this project: the Mackenzie Highway, the Mackenzie Highway Winter Road north of Wrigley and the Trout Lake Winter Road.

- Please provide the following information:
 - Please provide data on the anticipated increases (both absolute and percentage) in traffic volume due to this project on the following portions of the public highway system:
 - Mackenzie Highway from the Alberta border to the Highway #3 turn-off;
 - Mackenzie Highway from the Highway #3 turn-off to Fort Simpson;
 - Mackenzie Highway from Fort Simpson to Wrigley,
 - Mackenzie Highway Winter Road from Wrigley to the Deh Cho border; and
 - The Trout Lake Winter Road.

Differentiate between passenger vehicles (such as cars, SUVs, vans, pick-ups) and larger vehicles (flatbeds, tractor trailers, fuel delivery, etc.).

RESPONSE:

There will be approximately 20 to 30 pick-up trucks, 3 low-boys, one fuel truck, one water truck, one hydrovac truck, two passenger vans, two mechanic rigs on each of the work areas (Deh Cho North and Deh Cho South) associated with the Program.

During the Program, the majority of the travel will be along the Mackenzie Highway Winter Road from Blackwater River to Wrigley, Mackenzie Highway from Wrigley to the Trout Lake Road, and along the Trout Lake Road from its intersection with the Mackenzie Highway to its intersection with the Enbridge right-of-way.

Imperial Response - IR 2.12B (MVEIRB)

Application Name: 2004 Winter Field Geotechnical Investigation Program in the Deh Cho Region

Document Reference: Developer's Assessment Report

Request From: Deh Cho First Nations - Pipeline Working Group

Regulatory Agency Reference: 12B

DAR Section: Section 5.1, Access

ToR Section: no reference

Imperial Reference: DAR IR 2.12B (MVEIRB)

INFORMATION REQUEST:

2.12B Imperial identifies 3 public roads as primary access routes for this project: the Mackenzie Highway, the Mackenzie Highway Winter Road north of Wrigley and the Trout Lake Winter Road.

- Please provide the following information:
- Describe the variations in traffic volume increases over time from December 2004 to April 2005.

RESPONSE:

Mobilization (early January) and demobilization (mid to late March) will be the heaviest periods for lowboy traffic. The crew movements with the pick-ups will be heaviest from mid-January to mid-March.

Imperial Response - IR 2.12C (MVEIRB)

Application Name: 2004 Winter Field Geotechnical Investigation Program in the Deh Cho Region

Document Reference: Developer's Assessment Report

Request From: Deh Cho First Nations - Pipeline Working Group

Regulatory Agency Reference: 12C

DAR Section: 5.1, Access

ToR Section: no reference

Imperial Reference: DAR IR 2.12C (MVEIRB)

INFORMATION REQUEST:

2.12C Imperial identifies 3 public roads as primary access routes for this project: the Mackenzie Highway, the Mackenzie Highway Winter Road north of Wrigley and the Trout Lake Winter Road.

- Please provide the following information:
 - Identify the anticipated speeds and lengths of travel time for each of the above portions of highway for both passenger vehicles and larger vehicles.

RESPONSE:

Vehicles assigned to the Program will travel along the three public roads at speeds in accordance with the Government of the Northwest Territories – Department of Transportation *Motor Vehicles Act*. These limits are:

- Arterial Roads (Hwy #1) - 90 km/h for light or heavy vehicles.
- Trout Lake Winter Road - 35 km/hr for light vehicles and 17.5 km/hr for heavy vehicles.
- Mackenzie Highway #1 Winter Road - 35 km/hr for light vehicles and 17.5 km/hr for heavy vehicles.

Travel time will vary depending on road and weather conditions along the Mackenzie Highway Winter Road from the Deh Cho - Sahtu Boundary to Wrigley (approx. 110 km). However, for travel at a rate of 75% of the posted speed limits, typical travel times will vary from about 4 hours for light vehicles to about 8 hours for heavy vehicles. Travel time along the Mackenzie Highway from Wrigley to the Trout Lake Road Intersection (approx. 321 km) is about 5 hours for all traffic. Travel time along the Trout Lake Road to the intersection with the Enbridge right-of-way (approx. 73 km) will vary from 3 hours for light vehicles to about 6 hours for heavy vehicles.

Imperial Response - IR 2.13A (MVEIRB)

Application Name: 2004 Winter Field Geotechnical Investigation Program in the Deh Cho Region

Document Reference: Developer's Assessment Report

Request From: Deh Cho First Nations - Pipeline Working Group

Regulatory Agency Reference: no reference

DAR Section: 5.1, Access

ToR Section: no reference

Imperial Reference: DAR IR 2.13A (MVEIRB)

INFORMATION REQUEST:

2.13 Imperial identifies 3 public roads as primary access routes for this project: the Mackenzie Highway, the Mackenzie Highway Winter Road north of Wrigley and the Trout Lake Winter Road.

- Please provide the following information:
Excluding this project, please provide data on the expected traffic volumes on the following portions of the public highway system between December 2004 and April 2005:
 - Mackenzie Highway from the Alberta border to the Highway #3 turn-off;
 - Mackenzie Highway from the Highway #3 turn-off to Fort Simpson;
 - Mackenzie Highway from Fort Simpson to Wrigley;
 - Mackenzie Highway Winter Road from Wrigley to the Dehcho border; and
 - The Trout Lake Winter Road.Differentiate between passenger vehicles (such as cars, SUVs, vans, pick-ups) and larger vehicles (flatbeds tractor trailers, fuel delivery, etc.)

RESPONSE:

This Information Request was directed by the MVEIRB to Indian and Northern Affairs Canada. Preparing the response to this Information Request is the responsibility of Indian and Northern Affairs Canada.

Imperial Response - IR 2.13B (MVEIRB)

Application Name: 2004 Winter Field Geotechnical Investigation Program in the Deh Cho Region

Document Reference: Developer's Assessment Report

Request From: Deh Cho First Nations - Pipeline Working Group

Regulatory Agency Reference: 13B

DAR Section: 5.1, Access

ToR Section: no reference

Imperial Reference: DAR IR 2.13B (MVEIRB)

INFORMATION REQUEST:

1.13B Imperial identifies 3 public roads as primary access routes for this project: the Mackenzie Highway, the Mackenzie Highway Winter Road north of Wrigley and the Trout Lake Winter Road.

- Please provide the following information:
 - Describe the predicted variations in traffic volume over time from December 2004 to April 2005.

RESPONSE:

This Information Request was directed by the MVEIRB to Indian and Northern Affairs Canada. Preparing the response to this Information Request is the responsibility of Indian and Northern Affairs Canada.

Imperial Response - IR 2.14 (MVEIRB)

Application Name: 2004 Winter Field Geotechnical Investigation Program in the Deh Cho Region

Document Reference: Developer's Assessment Report

Request From: Deh Cho First Nations - Pipeline Working Group

Regulatory Agency Reference: no reference

DAR Section: 5.1, Access

ToR Section: no reference

Imperial Reference: DAR IR 2.14 (MVEIRB)

INFORMATION REQUEST:

2.14 Imperial Oil has identified wildlife mortality due to wildlife-vehicle collisions as being a potential impact of this project.

The deer whistle is intended as an alarm device, designed to get the attention of the deer without causing flight. They are designed to be effective at distances from 100m to 2km away from the vehicle.

- Please provide the following information:
 - Please provide some analysis on the potential effectiveness of deer whistles, and other alternative alert devices, to minimize the potential of wildlife-vehicle collisions for this project.
 - Please comment on the trade-off between creating additional project noise versus the potential value of using such alert devices.

RESPONSE:

The response to this information request has been provided to the MVEIRB by Environment Canada in their letter dated October 27, 2004.

Imperial Response - IR 2.15A (MVEIRB)

Application Name: 2004 Winter Field Geotechnical Investigation Program in the Deh Cho Region

Document Reference: Developer's Assessment Report

Request From: Deh Cho First Nations - Pipeline Working Group

Regulatory Agency Reference: 15A

DAR Section: 8.2 and 9.3, Heritage Resources

ToR Section: no reference

Imperial Reference: DAR IR 2.15A (MVEIRB)

INFORMATION REQUEST:

2.15A On page 8-7, Imperial states, "An interim report of this work was prepared and submitted to PWNHC in December 2003 (Clarke et al. 2003)."

On page 9-3, Imperial states, "A pre-disturbance heritage resources impact assessment will be completed at all locations of high potential for heritage resources where subsurface impacts might occur... At the completion of the pre-disturbance impact assessment, an interim report will be submitted to the PWNHC for their review."

On page 8-11, Imperial states, "The south side of the river and several borrow sites south of the river are planned for heritage resources investigations in the summer of 2004."

- Please provide the following information:
 - Please provide the report referred to above as Clarke et al. 2003 to the PWG, its member communities and the Review Board (on a confidential basis if necessary).
-

RESPONSE:

Imperial has requested approval from the Prince of Wales Northern Heritage Centre to release the report referenced as Clarke et al 2003. After approval is obtained, Imperial will forward those sections of the report authorized for release. Because of the confidential nature of the material in the report, distribution might be restricted, including preclusion from posting on the public record for this environmental assessment. Imperial understands from the Prince of Wales Northern Heritage Centre that confidentiality conditions under which the report would be provided to the Mackenzie Valley Environmental Impact Review Board have to be established. Imperial expects to receive approval to release the report or sections of the report to the Pipeline Working Group and its member communities.

The member communities to whom this report will be forwarded will include:

Grand Chief Mr. Herb Norwegian
Deh Cho First Nations
PO Box 89
Fort Simpson, NT X0E 0N0

Chief David Moses
Pehdzeh Ki First Nation
General Delivery
Wrigley, NT X0E 1E0

Chief Kenya Norwegian
Liidlili Kue First Nations
PO Box 469
Fort Simpson, NT X0E 0N0

Chief Fred Norwegian
Jean Marie First Nation
General Delivery
Fort Simpson, NT X0E 0N0

Chief Dennis Deneron
Sambaa Ke Dene Band
General Delivery
Trout Lake, NT X0E 1E0

Imperial Response - IR 2.15B (MVEIRB)

Application Name: 2004 Winter Field Geotechnical Investigation Program in the Deh Cho Region

Document Reference: Developer's Assessment Report

Request From: Deh Cho First Nations - Pipeline Working Group

Regulatory Agency Reference: 15B

DAR Section: 8.2 and 9.3, Heritage Resources

ToR Section: no reference

Imperial Reference: DAR IR 2.15B (MVEIRB)

INFORMATION REQUEST:

2.15B On page 8-7, Imperial states, "An interim report of this work was prepared and submitted to PWNHC in December 2003 (Clarke et al. 2003)."

On page 9-3, Imperial states, "A pre-disturbance heritage resources impact assessment will be completed at all locations of high potential for heritage resources where subsurface impacts might occur... At the completion of the pre-disturbance impact assessment, an interim report will be submitted to the PWNHC for their review."

On page 8-11, Imperial states, "The south side of the river and several borrow sites south of the river are planned for heritage resources investigations in the summer of 2004."

- Please provide the following information:
 - Please provide the pre-disturbance impact assessment reports to the PWG, its member communities and the Review Board (on a confidential basis if necessary).

RESPONSE:

Imperial has requested approval from the Prince of Wales Northern Heritage Centre to release the final report written under Archaeologist's Permit 2002-915, and the interim and final reports written under Archaeologist's Permit 2003-933. After approval is obtained, Imperial will forward those sections of the report authorized for release. Because of the confidential nature of the material in the report, distribution might be restricted, including preclusion from posting on the public record for this environmental assessment. Imperial understands from the Prince of Wales Northern Heritage Centre that confidentiality conditions under which the report would be provided to the Mackenzie Valley Environmental Impact Review Board have to be established. Imperial expects to receive approval to release the report or sections of the report to the Pipeline Working Group and its member communities.

The member communities to whom the reports will be forwarded include:

Grand Chief Mr. Herb Norwegian
Deh Cho First Nations
PO Box 89
Fort Simpson, NT X0E 0N0

Chief David Moses
Pehdzeh Ki First Nation
General Delivery
Wrigley, NT X0E 1E0

Chief Kenya Norwegian
Liidlii Kue First Nations
PO Box 469
Fort Simpson, NT X0E 0N0

Chief Fred Norwegian
Jean Marie First Nation
General Delivery
Fort Simpson, NT X0E 0N0

Chief Dennis Deneron
Sambaa Ke Dene Band
General Delivery
Trout Lake, NT X0E 1E0

Imperial Response - IR 2.15C (MVEIRB)

Application Name: 2004 Winter Field Geotechnical Investigation Program in the Deh Cho Region

Document Reference: Developer's Assessment Report

Request From: Deh Cho First Nations - Pipeline Working Group

Regulatory Agency Reference: 15C

DAR Section: 8.2 and 9.3, Heritage Resources

ToR Section: no reference

Imperial Reference: DAR IR 2.15C (MVEIRB)

INFORMATION REQUEST:

2.15C On page 8-7, Imperial states, "An interim report of this work was prepared and submitted to PWNHC in December 2003 (Clarke et al. 2003)."

On page 9-3, Imperial states, "A pre-disturbance heritage resources impact assessment will be completed at all locations of high potential for heritage resources where subsurface impacts might occur... At the completion of the pre-disturbance impact assessment, an interim report will be submitted to the PWNHC for their review."

On page 8-11, Imperial states, "The south side of the river and several borrow sites south of the river are planned for heritage resources investigations in the summer of 2004."

- Please provide the following information:
 - Please provide the reports referred to on page 8-11. The reports should be provided to the PWG, its member communities and the Review Board (on a confidential basis if necessary).
-

RESPONSE:

This report has not been completed. When it is available, it will be distributed according to the conditions stipulated by the Prince of Wales Northern Heritage Centre.

Imperial Response - IR 2.15D (MVEIRB)

Application Name: 2004 Winter Field Geotechnical Investigation Program in the Deh Cho Region

Document Reference: Developer's Assessment Report

Request From: Deh Cho First Nations - Pipeline Working Group

Regulatory Agency Reference: 15 D

DAR Section: 8.2 and 9.3, Heritage Resources

ToR Section: no reference

Imperial Reference: DAR IR 2.15D (MVEIRB)

INFORMATION REQUEST:

2.15D On page 8-7, Imperial states, "An interim report of this work was prepared and submitted to PWNHC in December 2003 (Clarke et al. 2003)."

On page 9-3, Imperial states, "A pre-disturbance heritage resources impact assessment will be completed at all locations of high potential for heritage resources where subsurface impacts might occur... At the completion of the pre-disturbance impact assessment, an interim report will be submitted to the PWNHC for their review."

On page 8-11, Imperial states, "The south side of the river and several borrow sites south of the river are planned for heritage resources investigations in the summer of 2004."

- Please provide the following information:
 - Please provide any other heritage resource reports not specifically requested in a), b) or c).
-

RESPONSE:

There are no heritage resource reports other than those reports referred to in Imperial's responses to IR 2.15A (MVEIRB), 2.15B (MVEIRB), and 2.15C (MVEIRB).

Imperial Response - IR 2.15E (MVEIRB)

Application Name: 2004 Winter Field Geotechnical Investigation Program in the Deh Cho Region

Document Reference: Developer's Assessment Report

Request From: Deh Cho First Nations - Pipeline Working Group

Regulatory Agency Reference: 15E

DAR Section: 8.2 and 9.3, Heritage Resources

ToR Section: no reference

Imperial Reference: DAR IR 2.15E (MVEIRB)

INFORMATION REQUEST:

2.15E On page 8-7, Imperial states, "An interim report of this work was prepared and submitted to PWNHC in December 2003 (Clarke et al. 2003)."

On page 9-3, Imperial states, "A pre-disturbance heritage resources impact assessment will be completed at all locations of high potential for heritage resources where subsurface impacts might occur... At the completion of the pre-disturbance impact assessment, an interim report will be submitted to the PWNHC for their review."

On page 8-11, Imperial states, "The south side of the river and several borrow sites south of the river are planned for heritage resources investigations in the summer of 2004."

- Please provide the following information:
 - For the reports referred to in b), c) and d), please provide any recommendations that were made by the PWNHC and describe what Imperial has done, or will do, in response to those recommendations.

RESPONSE:

Recommendations are made within each of the heritage resource reports on a location specific basis. As heritage resource sites are associated with fixed locations on the land each site is checked to determine if there is overlap with a known heritage resource site. These are presented in each of the heritage resource reports as well as descriptions of heritage resource sites that were investigated as part of the particular field program.

In response to the 2003-933 Interim report that was submitted to the Prince of Wales Northern Heritage Centre, Imperial provided the Mackenzie Valley Land and Water Board with a list of the locations that were proposed for the Program and a list of recommendations under which the Territorial Archaeologist felt that the Program could proceed. These are listed in the Table 15-1.

Table 15-1: Prince of Wales Northern Heritage Centre Recommendations for the Program Sites

NAME	KP	2002 Archeological Potential Rating	Proponent's Recommendation	PWNHC Recommendation
FH12	824	Moderate	Proceed	Post Impact Assessment
9.038PA	827	High	Proceed	Post Impact Assessment
9.038PB	825	High	Proceed	Post Impact Assessment
Blackwater R. Crossing	831	High	Post Impact	Post Impact Assessment
9.091P	833	High	Proceed	Post Impact Assessment
9.044PA	836	High	Post Impact	Post Impact Assessment
9.044PB	836	High	Post Impact	Post Impact Assessment
10.001P	837	Moderate	Proceed	Post Impact Assessment
10.004P	844	High	Proceed	Post Impact Assessment
10.003P	846	Moderate	Proceed	Post Impact Assessment
FH13	853	Moderate	Proceed	Post Impact Assessment
10.007P	868	High	Post Impact	Post Impact Assessment
FH14	873	Moderate	Proceed	Post Impact Assessment
10.013P	881	Low	Proceed	Proceed
White Sands Cr. Crossing	884	Moderate	Proceed	Post Impact Assessment
10.014 AP	884	High	Proceed	Post Impact Assessment
10.020P	892	High	Proceed	Post Impact Assessment
Ochre River Crossing	893	Moderate to High	Post Impact	Post Impact Assessment
10.022P	895	High	Proceed	Post Impact Assessment
10.030P	908	Moderate	Proceed	Post Impact Assessment
FH15	911	Moderate	Proceed	Post Impact Assessment
10.033P	912	High	Avoid Creek Bank/Post Impact	Avoid Creek Bank Post Impact Assessment
FH16	916	Moderate	Proceed	Post Impact Assessment
10.036P	921	High	Proceed	Post Impact Assessment
10.120P	923	High	Proceed	Post Impact Assessment
10.038PA	923	High	Avoid Creek Bank/Post Impact	Avoid Creek Bank Post Impact Assessment
Wrigley Camp	923	Moderate	Proceed	Post Impact Assessment
Smith Creek Crossing	930	None	Post impact	Post Impact Assessment
10.043P	930	High	Proceed	Post Impact Assessment
FH17	934	High	Proceed	Post Impact Assessment
10.044BP	932	High	Post Impact	Post Impact Assessment
10.055P	945	Moderate	Proceed	Post Impact Assessment
River Between Two Mountains	961	High	Post Impact	Post Impact Assessment
10.071P	963	High	Post Impact	Post Impact Assessment
10.072P	968	Moderate	Proceed	Post Impact Assessment

NAME	KP	2002 Archeological Potential Rating	Proponent's Recommendation	PWNHC Recommendation
Willowlake R. Crossing	989	High	Post impact	Site Avoidance and Post Impact Assessment
20.015P	991	High	Post Impact	Post Impact Assessment
Willowlake Camp	992	High	Post impact	Post Impact Assessment
11.019P	1017	Moderate	Proceed	Post Impact Assessment
11.021P	1023	Moderate	Proceed	Post Impact Assessment
11.033P	1033	Low	Proceed	Proceed
11.055PA	1055	High	Proceed	Post Impact Assessment
11.055PB	1057	High	Proceed	Post Impact Assessment
FH18	1082	Moderate	Proceed	Post Impact Assessment
20.018P	1086	Moderate	Proceed	Post Impact Assessment
11.067P	1097	High	Post Impact	Post Impact Assessment
11.071P	1123	Low	Proceed	Proceed
Mackenzie R. Crossing	1137	Moderate	Assessed (N. Side)	No ground disturbance on south side before full HRIA conducted. Post Impact Assessment
FH19	1140	Moderate	Proceed	Post Impact Assessment
FH19T1	1145	Moderate	Proceed	Post Impact Assessment
11.174P	1146	High	Monitoring	On-site Monitoring
Fort Simpson	1146	Moderate	Proceed	Post Impact Assessment
11.192P	1181	High	Monitoring	On-site Monitoring
11.204PA	1192	Low	Proceed	Post Impact Assessment
11.204PB	1193	Moderate	Proceed	On-site Monitoring
20.057P	1203	High	Monitoring	On-site Monitoring
FH20	1231	Moderate	Proceed	Post Impact Assessment
Trout Lake Camp	1237	High	Post impact	Post Impact Assessment
Trout River Crossing	1238	High	Post impact	Post Impact Assessment
20.064P	1250	Moderate	Proceed	Post Impact Assessment
20.002P	1259	Low	Proceed	Post Impact Assessment
20.003P	1282	Moderate	Proceed	Post Impact Assessment
FH21	1298	Moderate	Proceed	Post Impact Assessment
20.004PA	1307	High	Proceed	Post Impact Assessment
20.004PB	1305	High	Proceed	Post Impact Assessment
FH22	1318	Moderate	Proceed	Post Impact Assessment
20.006P	1319	Low	Proceed	Proceed
20.066P	1330	Low	Proceed	Proceed
20.008P	1338	High	Proceed	Post Impact Assessment
20.068P	1348	Low	Proceed	Proceed

Imperial Response - IR 2.16A (MVEIRB)

Application Name: 2004 Winter Field Geotechnical Investigation Program in the Deh Cho Region

Document Reference: Developer's Assessment Report

Request From: Deh Cho First Nations - Pipeline Working Group

Regulatory Agency Reference: 16A

DAR Section: 8.2 and 9.3, Heritage Resources

ToR Section: no reference

Imperial Reference: DAR IR 2.16A (MVEIRB)

INFORMATION REQUEST:

2.16A On page 9-9, Imperial states, "All supervisory and environmental staff will be provided with maps and documentation identifying the location and nature of heritage resource sites near the work areas. This documentation will be created in such a way that known heritage resources will be avoided where required."

On page 9-9, Imperial states, "...if unexpected heritage resources are encountered during activities, all work in the immediate area will stop..."

On page 9-11, Imperial states, "All supervisory staff will be provided a manual detailing procedures to follow should previously unidentified heritage resources be encountered."

- Please provide the following information:
 - Please confirm that the maps will be provided to project personnel on an as-needed basis only. Also please describe the process that Imperial Oil will have in place to ensure these maps are all recovered from the project personnel once work at a particular location has been completed.

RESPONSE:

Imperial proposed to use the same approach in the Deh Cho Region that was used during the 2004 Winter Field Geotechnical Investigation Program in the Gwich'in Settlement Area with respect to known heritage resource sites.

Maps with heritage resource sites located with GPS coordinates providing an approximate location (buffer area drawn around the heritage resource) will be provided to ColtKBR staff listed below on an as-needed basis only.

The ColtKBR staff with responsibility to protect heritage resources include:

- Field Superintendent
- Supervisory and Environmental staff
- Environmental Inspector
- Program Engineer
- Topographical Surveyor

At the conclusion of the Program, all heritage resource maps will be gathered and returned to Imperial.

Imperial Response - IR 2.16B (MVEIRB)

Application Name: 2004 Winter Field Geotechnical Investigation Program in the Deh Cho Region

Document Reference: Developer's Assessment Report

Request From: Deh Cho First Nations - Pipeline Working Group

Regulatory Agency Reference: 16B

DAR Section: 8.2 and 9.3, Heritage Resources

ToR Section: no reference

Imperial Reference: DAR IR 2.16B (MVEIRB)

INFORMATION REQUEST:

2.16B On page 9-9, Imperial states, "All supervisory and environmental staff will be provided with maps and documentation identifying the location and nature of heritage resource sites near the work areas. This documentation will be created in such a way that known heritage resources will be avoided where required."

On page 9-9, Imperial states, "...if unexpected heritage resources are encountered during activities, all work in the immediate area will stop..."

On page 9-11, Imperial states, "All supervisory staff will be provided a manual detailing procedures to follow should previously unidentified heritage resources be encountered."

- Please provide the following information:
- Will a local community monitor be present at all groundbreaking activities to look for evidence of heritage resources?

RESPONSE:

The responsibilities of the Local Environmental and Wildlife Monitors include assisting the Topographical Surveyor in confirming in the route from the primary access, along the secondary access to the investigation sites. During site investigation activities, the Wildlife and Environmental Monitors will be present to examine the test materials for evidence of heritage resources.

Imperial Response - IR 2.16C (MVEIRB)

Application Name: 2004 Winter Field Geotechnical Investigation Program in the Deh Cho Region

Document Reference: Developer's Assessment Report

Request From: Deh Cho First Nations - Pipeline Working Group

Regulatory Agency Reference: 16C

DAR Section: 8.2 and 9.3, Heritage Resources

ToR Section: no reference

Imperial Reference: DAR IR 2.16C (MVEIRB)

INFORMATION REQUEST:

2.16C On page 9-9, Imperial states, "All supervisory and environmental staff will be provided with maps and documentation identifying the location and nature of heritage resource sites near the work areas. This documentation will be created in such a way that known heritage resources will be avoided where required."

On page 9-9, Imperial states, "...if unexpected heritage resources are encountered during activities, all work in the immediate area will stop..."

On page 9-11, Imperial states, "All supervisory staff will be provided a manual detailing procedures to follow should previously unidentified heritage resources be encountered."

- Please provide the following information:
- Please identify the individuals who will have the authority to stop the work. If the local community monitor is not included among this list, then please explain why not.

RESPONSE:

All Program staff including Environmental and Wildlife Monitors have the authority to stop work if heritage resources are uncovered during site activities. The work stoppage is then reported to the Field Superintendent for further action as set out in the Environmental Protection Plan.

Imperial Response - IR 2.16D (MVEIRB)

Application Name: 2004 Winter Field Geotechnical Investigation Program in the Deh Cho Region

Document Reference: Developer's Assessment Report

Request From: Deh Cho First Nations - Pipeline Working Group

Regulatory Agency Reference: 16D

DAR Section: 8.1 and 9.3, Heritage Resources

ToR Section: no reference

Imperial Reference: DAR IR 2.16D (MVEIRB)

INFORMATION REQUEST:

2.16D On page 9-9, Imperial states, "All supervisory and environmental staff will be provided with maps and documentation identifying the location and nature of heritage resource sites near the work areas. This documentation will be created in such a way that known heritage resources will be avoided where required."

On page 9-9, Imperial states, "...if unexpected heritage resources are encountered during activities, all work in the immediate area will stop..."

On page 9-11, Imperial states, "All supervisory staff will be provided a manual detailing procedures to follow should previously unidentified heritage resources be encountered."

- Please provide the following information:
 - Please provide the manual that will be provided to supervisory staff.

RESPONSE:

The manual consists of the Heritage Resources Protection Plan and Environmental Protection Plan, both of which are included in the Land Use Permit Application.

Imperial Response - IR 2.17A (MVEIRB)

Application Name: 2004 Winter Field Geotechnical Investigation Program in the Deh Cho Region

Document Reference: Developer's Assessment Report

Request From: Deh Cho First Nations - Pipeline Working Group

Regulatory Agency Reference: 17A

DAR Section: 9.1, Economic Impacts and Mitigation

ToR Section: no reference

Imperial Reference: DAR IR 2.17A (MVEIRB)

INFORMATION REQUEST:

2.17A On page 9-3, Imperial states, " The program in the Fort Simpson area would include using Fort Simpson streets to move approximately 20 loads of equipment across the Mackenzie River via ice bridge. These moves will be made during the winter and little impact to the integrity of the streets is expected. These moves will take place at times that avoid disruption of the local traffic."

- Please provide the following information:
 - Please provide the rationale for Imperial's conclusion that there will be little impact to Fort Simpson streets.

RESPONSE:

The majority of Program traffic on the Fort Simpson streets will be pick-up truck traffic with some lowboy, water truck and hydrovac truck traffic on occasion. The frequency of this traffic is expected to be moderate from January to March.

The 20 loads of equipment will be staggered and would not disrupt daily traffic. The route would bypass the asphalted streets of Fort Simpson and travel along Antoine Drive to the Ice Bridge (truck route). The axle loads of the vehicles will not exceed any traditional loadings and, as a result, should not damage the route.

Imperial Response - IR 2.17B (MVEIRB)

Application Name: 2004 Winter Field Geotechnical Investigation Program in the Deh Cho Region

Document Reference: Developer's Assessment Report

Request From: Deh Cho First Nations - Pipeline Working Group

Regulatory Agency Reference: 17B

DAR Section: 9.1, Economic Impacts and Mitigation

ToR Section: no reference

Imperial Reference: DAR IR 2.17B (MVEIRB)

INFORMATION REQUEST:

2.17B On page 9-3, Imperial states, " The program in the Fort Simpson area would include using Fort Simpson streets to move approximately 20 loads of equipment across the Mackenzie River via ice bridge. These moves will be made during the winter a little impact to the integrity of the streets is expected. These moves will take place at times that avoid disruption of the local traffic."

- Please provide the following information:
 - Has Imperial discussed the impact on the streets with the Village of Fort Simpson? What was the Village's view on this matter? Please provide any agreements that are in place between the Village and Imperial. If there are no agreements, then under what authority will Imperial have its contractors "establish a maintenance program to maintain these local roads?"
-

RESPONSE:

Imperial has made no agreements with the Village of Fort Simpson. With the axle loadings and frequency of the vehicles traveling along Antoine Drive, additional maintenance requirements are not anticipated. Imperial will respond to any concerns raised by the Village of Fort Simpson regarding traffic issues.

Imperial Response - IR 2.17C (MVEIRB)

Application Name: 2004 Winter Field Geotechnical Investigation Program in the Deh Cho Region

Document Reference: Developer's Assessment Report

Request From: Deh Cho First Nations - Pipeline Working Group

Regulatory Agency Reference: 17C

DAR Section: Section 9.1, Economic Impacts and Mitigation

ToR Section: no reference

Imperial Reference: DAR IR 2.17C (MVEIRB)

INFORMATION REQUEST:

2.17C On page 9-3, Imperial states, " The program in the Fort Simpson area would include using Fort Simpson streets to move approximately 20 loads of equipment across the Mackenzie River via ice bridge. These moves will be made during the winter and little impact to the integrity of the streets is expected. These moves will take place at times that avoid disruption of the local traffic."

- Please provide the following information:
 - How has, or will, Imperial determine when the project traffic should move through Fort Simpson to minimize traffic disruption? Has this issue been discussed with the Village? If yes, please summarize those discussions.
-

RESPONSE:

Imperial will consult with the Village of Fort Simpson prior to movement of the heavy loads along Antoine Drive to explore methods to reduce traffic disruption within Fort Simpson. No discussions have been carried out between Imperial and the Village.

Imperial Response - IR 2.18A (MVEIRB)

Application Name: 2004 Winter Field Geotechnical Investigation Program in the Deh Cho Region

Document Reference: Developer's Assessment Report

Request From: Deh Cho First Nations - Pipeline Working Group

Regulatory Agency Reference: 18A

DAR Section: 9.1, Economic Impacts and Mitigation

ToR Section: no reference

Imperial Reference: DAR IR 2.18A (MVEIRB)

INFORMATION REQUEST:

2.18A Imperial Oil states that local airstrips will be used during the program.

- Please provide the following information:
 - Will project personnel use scheduled public flights? If yes, then please estimate the project's impact on seat availability for the traveling public.

RESPONSE:

Program personnel will use scheduled public flights. The Program personnel will have staggered start dates so problems with seat availability are not anticipated. Experience conducting geotechnical programs in the Mackenzie Delta and McKenzie Valley over the past two years indicates that these programs have not had a significant impact on access by the public to air travel.

Imperial Response - IR 2.18B (PWG-DFN & MVEIRB)

Application Name: 2004 Winter Field Geotechnical Investigation Program in the Deh Cho Region

Document Reference: Developer's Assessment Report

Request From: Deh Cho First Nations - Pipeline Working Group

Regulatory Agency Reference: no reference

DAR Section: 9.1, Economic Impacts and Mitigation

ToR Section: no reference

Imperial Reference: DAR IR 2.18B (PWG-DFN & MVEIRB)

INFORMATION REQUEST:

2.18B Imperial Oil states that local airstrips will be used during the program.

- Please provide the following information:
 - Describe and provide any agreements between Imperial Oil and the GNWT regarding the use, upgrading and/or maintenance of public airports due to this project. (Imperial)
-

RESPONSE:

No agreements are required and none are in place regarding the use, upgrading or maintenance of public airstrips in the Deh Cho Region for the Program.

Imperial Response - IR 2.18C (MVEIRB)

Application Name: 2004 Winter Field Geotechnical Investigation Program in the Deh Cho Region

Document Reference: Developer's Assessment Report

Request From: Deh Cho First Nations - Pipeline Working Group

Regulatory Agency Reference: 18C

DAR Section: 9.1, Economic Impacts and Mitigation

ToR Section: no reference

Imperial Reference: DAR IR 2.18C (MVEIRB)

INFORMATION REQUEST:

2.18C Imperial Oil states that local airstrips will be used during the program.

- Please provide the following information:
 - Identify any unrecoverable costs to the GNWT as a result of this project's use of public airports. (GNWT)

RESPONSE:

This Information Request was directed by the MVEIRB to the Government of the Northwest Territories. Preparing the response to this Information Request is the responsibility of the Government of the Northwest Territories.

Imperial Response - IR 2.19A (MVEIRB)

Application Name: 2004 Winter Field Geotechnical Investigation Program in the Deh Cho Region

Document Reference: Developer's Assessment Report

Request From: Deh Cho First Nations - Pipeline Working Group

Regulatory Agency Reference: 19A

DAR Section: 9.2, Social Impacts and Mitigation

ToR Section: no reference

Imperial Reference: DAR IR 2.19A (MVEIRB)

INFORMATION REQUEST:

2.19A On page 9-7, Imperial Oil acknowledges that the access trails opened by this project could increase hunting, trapping and fishing.

There is also a community concern about clearings created by this project providing landing areas for helicopters transporting hunters from outside the region.

Imperial says that the community assigned environmental monitors will traverse the program area regularly to monitor for potential illegal hunting and fishing.

- Please provide the following information:
- Beyond rolling back the slash, please discuss what other measures, such as creating barriers or planting trees, are available to limit the inappropriate use of access trails and clearings?

RESPONSE:

Rolling back slash to limit inappropriate use of access trails and clearings has been a suitable deterrent in other regions. Imperial plans to use the same approach for the Program.

Imperial Response - IR 2.19B (MVEIRB)

Application Name: 2004 Winter Field Geotechnical Investigation Program in the Deh Cho Region

Document Reference: Developer's Assessment Report

Request From: Deh Cho First Nations - Pipeline Working Group

Regulatory Agency Reference: 19B

DAR Section: 9.2, Social Impacts and Mitigation

ToR Section: no reference

Imperial Reference: DAR IR 2.19B (MVEIRB)

INFORMATION REQUEST:

2.19B On page 9-7, Imperial Oil acknowledges that the access trails opened by this project could increase hunting, trapping and fishing.

There is also a community concern about clearings created by this project providing landing areas for helicopters transporting hunters from outside the region.

Imperial says that the community assigned environmental monitors will traverse the program area regularly to monitor for potential illegal hunting and fishing.

- Please provide the following information:
 - Please explain under what authority the environmental monitors will be able to request proof of legal hunting and fishing. What actions will be taken if illegal activities are found?
-

RESPONSE:

Local Wildlife and Environmental Monitors have no authority to request proof of legal hunting and fishing activities. If illegal hunting and fishing activities are detected, the local band office, Government of Northwest Territories – Department of Resources, Wildlife and Economic Development, Indian and Northern Affairs Canada and the local RCMP detachment will be notified by the monitors.

Imperial Response - IR 2.20 (MVEIRB)

Application Name: 2004 Winter Field Geotechnical Investigation Program in the Deh Cho Region

Document Reference: Developer's Assessment Report

Request From: Deh Cho First Nations - Pipeline Working Group

Regulatory Agency Reference: no reference

DAR Section: Section 9.4, Traditional Land Use

ToR Section: no reference

Imperial Reference: DAR IR 2.20 (MVEIRB)

INFORMATION REQUEST:

2.20 Imperial Oil states that the issue of compensating trappers will be addressed in the context of the negotiations of a benefits agreement between Imperial and the Deh Cho First Nations.

However, these negotiations failed to produce an agreement in 2003 and might not produce an agreement in 2004.

- If the Imperial Oil and the Deh Cho are unable to conclude a benefits agreement, please describe the trapper compensation procedure that will be put for this project.
-

RESPONSE:

Imperial will work with communities to help identify any trappers that could be impacted by the Program.

Imperial will contact potentially impacted trappers to address possible prevention and mitigation measures. If a trapper suffers a loss or damage as a result of the Program activities, Imperial will compensate that trapper for actual loss or damage. It is the responsibility of the trapper to contact Imperial regarding loss or damage.

In discussion with the affected trapper, Imperial's compensation offer for fur loss will be based on market value of the fur and estimated harvest loss (referenced to current and historic records). If the trapper and Imperial are unable to reach agreement regarding compensation, Imperial would propose a mediation or arbitration process to determine the compensation.

Imperial Response - IR 2.21 (MVEIRB)

Application Name: 2004 Winter Field Geotechnical Investigation Program in the Deh Cho Region

Document Reference: Developer's Assessment Report

Request From: Deh Cho First Nations - Pipeline Working Group

Regulatory Agency Reference: 21

DAR Section: 9.4, Traditional Land Use

ToR Section: no reference

Imperial Reference: DAR IR 2.21 (MVEIRB)

INFORMATION REQUEST:

2.21 *Imperial Oil has only completed traditional knowledge studies with 3 of the 6 communities that are part of the PWG. The other 3 TK projects will likely be underway soon.*

- Please explain how Imperial Oil will incorporate the recommendations of the 3 unfinished TK studies into the design of this project.

RESPONSE:

Traditional Knowledge (TK) contracts are cooperative agreements signed between Imperial and those communities that have chosen to undertake the TK studies. Input from the TK studies that have been completed to date has been integrated into the design of the Program. Input from any other studies will be integrated into the Program design on an ongoing basis. To the extent possible, the Program will be revised to integrate information from the TK studies as it becomes available.

Imperial Response - IR 2.22 (MVEIRB)

Application Name: 2004 Winter Field Geotechnical Investigation Program in the Deh Cho Region

Document Reference: Developer's Assessment Report

Request From: Deh Cho First Nations - Pipeline Working Group

Regulatory Agency Reference: 22

DAR Section: Deficiency Response 1.1

ToR Section: no reference

Imperial Reference: DAR IR 2.22 (MVEIRB)

INFORMATION REQUEST:

2.22 *During previous negotiations, Imperial Oil has always met the PWG with refusal on altering Imperial's contracting process to address concerns of the communities.*

However, in DR 1.1, Imperial is suggesting that it would alter its contracting process by stating "Any contracting strategy ... for the Deh Cho Region will be subject to any agreement that is the product of such discussions."

- Please explain Imperial Oil's refusal to alter its contracting process in light of the above-noted statement.

RESPONSE:

Imperial has taken the additional steps described IR 2.6 (MVEIRB) accommodate community concerns with respect to the contracting process. These steps were developed to enhance the opportunity for Deh Cho businesses to successfully compete for work within their region.

Imperial Response - IR 2.23 (MVEIRB)

Application Name: 2004 Winter Field Geotechnical Investigation Program in the Deh Cho Region

Document Reference: Developer's Assessment Report

Request From: Deh Cho First Nations - Pipeline Working Group

Regulatory Agency Reference: no reference

DAR Section: Deficiency Responses 4.0 (A.)(1) and 10.0 PWG IR 4.0

ToR Section: no reference

Imperial Reference: DAR IR 2.23 (MVEIRB)

INFORMATION REQUEST:

2.23 DR 4.0 (A.)(1) Imperial states: *"On a 6 m x 10 m area, topsoil will be pushed to one side for the drilling rig operation" (emphasis added).*

In DR 10.0 Imperial states: "On a smaller portion of this area, topsoil might be pushed to one side for operating the drilling rig" (emphasis added).

In PWG IR 4.0, Imperial states: "No area around the borehole is stripped of surficial organic material".

These statements by Imperial Oil are at best unclear and at worst contradictory.

- Please provide a clear answer that resolves the inconsistencies in Imperial's submissions on this matter. If DR 10.0 is correct and topsoil might be removed, please describe the conditions that would require topsoil removal before drilling.
-

RESPONSE:

The response to this information request has been provided in Imperial Response – DAR IR 4.0 (Pipeline Working Group – Deh Cho First Nations). That response is provided below:

Boreholes

At borehole locations, an area of approximately 6 metres x 10 metres will be cleared of vegetation. Clearing involves falling trees and walking over the smaller trees and brush. Cut trees will be stacked at the side of the access. Previous submissions referenced a cleared area of 10 metres x 10 metres. This area would be the maximum area disturbed in the event that unforeseen environmental issues arise. As well, 10 metres x 10 metres (0.01 hectares) was used as an estimate for land use fee calculation purposes. Actual land use fees are calculated upon completion of the program and final land use inspection.

As the drill rig is moved into place, the snow is packed down, creating a protective cover over the ground's surface. The drill rig, bulldozer and equipment shack would be located on the 6 metre x 10 metre working area. No area around the borehole is stripped of surficial organic material. The drilling is conducted directly through the snow and ice and surficial organic material. The drill (250 mm in diameter) creates a disturbed area of .05 m², within the 6 metre x 10 metre working area. Once the drilling is completed, drill cuttings are placed into the hole forming a level contour with the surrounding surface. Any excess material is removed for disposal.

Test Pits

At test pit locations, an area of approximately 15 metres x 15 metres will be cleared of vegetation. Clearing involves falling trees and walking over the smaller trees and brush. Cut trees will be stacked at the side of the access. In some instances additional clearing may be required (depending on equipment and local terrain conditions) to a maximum area of 25 metres x 25 metres. Previous submissions

referenced a disturbed area of 25 metres x 25 metres. This area would be the maximum area disturbed in the event that unforeseen environmental issues arise. As well, an area of 25 metres x 25 metres (0.6 hectares) was used as an estimate for land use fee calculation purposes. Actual land use fees are calculated upon completion of the program and final land use inspection.

As the access is prepared and the backhoe is moved into place, the snow is packed down, creating a protective cover over the ground's surface. The backhoe, bulldozer and equipment shack would be located on the 15 metre x 15 metre working area. Previous plans indicated that a 6 metre x 15 metre area would be stripped of surficial organic material. After conducting geotechnical investigation programs in other regions of the Mackenzie Valley in the winters of 2003 and 2004, experience provides that the work can be accomplished by only stripping organic surficial material from an area of 6 metres x 6 metres. This provides a one metre wide buffer area around the test pit. The organic surficial material is pushed to one side of the area to be excavated. As the 5 metre x 5 metre test pit area is excavated to a depth of 5 metres, the spoil (inorganic material) is placed on the other side of the test pit. The organic surficial material and spoil are separated in this way. The 6 metre x 6 metre stripped area ensures that the inorganic spoil material is not mixing with organic surficial material as it comes out of the pit.

Once the test pit is excavated and the samples are removed, the inorganic spoil material is pushed back into the pit. The organic surficial material is then placed in the test pit forming a crown to allow for subsidence. The protective snow pack on the remainder of the site is left intact.

Imperial Response - IR 2.24 (MVEIRB)

Application Name: 2004 Winter Field Geotechnical Investigation Program in the Deh Cho Region

Document Reference: Developer's Assessment Report

Request From: Deh Cho First Nations - Pipeline Working Group

Regulatory Agency Reference: 24

DAR Section: Various locations

ToR Section: no reference

Imperial Reference: DAR IR 2.24 (MVEIRB)

INFORMATION REQUEST:

2.24 *Imperial Oil says that a high percentage of its secondary access routes will be along existing lines but does not elaborate on the extent of the re-growth on these existing lines.*

Increasing access to the land is a concern for the communities. In the material provided by Imperial, it is not possible to accurately determine the increase in access as the extent to which the existing lines proposed for use by Imperial are currently usable without clearing is unknown.

- For the project as a whole and within each of the protected and withdrawn areas, please provide the percentage of the existing secondary access lines that are currently usable for motorized transportation (including snowmobiles and ATVs) without any clearing activity required.
-

RESPONSE:

Within the Deh Cho Region, the Program's primary access includes the Mackenzie Highway, Enbridge Right-of-Way, Trout Lake Winter Road and the Winter Road north of Wrigley. All of these access routes are accessible to motorized transportation without additional clearing activity required.

All secondary access including existing cutlines and new access will require clearing and brushing to some degree. Aerial reconnaissance of both primary and secondary access was undertaken in the summer of 2003 and 2004 to provide an assessment of clearing requirements, however no quantitative assessment is available.

Imperial Response - IR 2.25 (MVEIRB)

Application Name: 2004 Winter Field Geotechnical Investigation Program in the Deh Cho Region

Document Reference: Developer's Assessment Report

Request From: Deh Cho First Nations - Pipeline Working Group

Regulatory Agency Reference: Review Board IR 1.1B

DAR Section: 25

ToR Section: no reference

Imperial Reference: DAR IR 2.25 (MVEIRB)

INFORMATION REQUEST:

2.25 *Imperial Oil says that for the geotechnical projects already completed in the ISR, the GSA and the SSA, the contracts have been awarded to either regional companies or regional companies or regional joint venture companies. Imperial also says that 14 of the 16 conditional contracts awarded in the Deh Cho Region in 2003 were awarded to Deh Cho companies or joint ventures.*

By focusing on the number of contracts conditional awarded, the provision of local benefits is perceived to be higher than is accurate. A more accurate view would be realized by looking at the total dollar value of the contracts.

- For each of the projects completed in the ISR, the GSA and the SSA, please provide the total dollar value of all contracts awarded along with the total value of all contracts awarded to companies located in the region or to regional joint ventures.
- For the conditional contracts awarded in the Deh Cho Region in 2003, please provide the total dollar value of all 16 contracts awarded along with the total value of all 14 contracts awarded to companies located in the region or to the regional joint ventures.

RESPONSE:

In Table 25.1 a summary of the bid awards in previous geotechnical investigations is provided. For the conditionals awards related to the 2004 Program in the Deh Cho, 7 of the 8 contracts will conditional awarded to local Deh Cho businesses. There was no conditional award of the contracts for the remaining work scope.

Table 25-1 Summary of Contract Awards in Geotechnical Investigation Programs

Program	Contract \$	# of Scopes of work	Scopes awarded to local business
2003 Winter Field Geotechnical Investigation Program in the Inuvialuit Settlement Region	\$4.7 million	8	8
2003 Winter Field Geotechnical Investigation Program in the Gwich'in Settlement Region	\$0.94 million	8	8
2004 Winter Field Geotechnical Investigation Program in the Gwich'in Settlement Region	\$8.98 million	8	8
2004 Winter Field Geotechnical Investigation Program in the Sahtu Settlement Region	\$8.69 million	8	8
2004 Winter Field Geotechnical Investigation Program in the Deh Cho (North) Region	\$5.43 million	8	7*
2004 Winter Field Geotechnical Investigation Program in the Deh Cho (South) Region	\$5.21 million	8	7*

* Conditionally awarded

Imperial Response - IR 2.26A (MVEIRB)

Application Name: 2004 Winter Field Geotechnical Investigation Program in the Deh Cho Region

Document Reference: Developer's Assessment Report

Request From: Deh Cho First Nations - Pipeline Working Group

Regulatory Agency Reference: no reference

DAR Section: 5.3, Drilling and Test Pits
PWG IR 4.0

ToR Section: no reference

Imperial Reference: DAR IR 2.26A (MVEIRB)

INFORMATION REQUEST:

1.26A *Imperial does not explain the decision process for deciding whether or not to drill a borehole or dig a test pit.*

The communities are concerned about size of 25 m x 25 m clearings for the test pits and do not want such clearings created unnecessarily. It would be preferable for Imperial to drill a successful borehole before digging a test pit at any locations

- Please provide the following:
 - Explain the process Imperial Oil will use for deciding whether or not to drill a borehole and/or dig a test pit. Will Imperial require the successful drilling of a borehole prior to deciding to dig a test pit to minimize the total number of test pits (and the total cleared area)?
-

RESPONSE:

There are generally three factors, technical, logistics and physical conditions that determine if a borehole or a test pit is required. The decision is made in the field with consultation among the Geotechnical Consultant, ColtKBR Superintendent and the Drilling Subcontractor.

Technical: Boreholes are used on borrow sites to determine the thickness of the material in the site and to determine the gross stratigraphy of the borrow site. Test pits are used to determine the detailed stratigraphy and ice content of the near surface materials and to obtain samples for laboratory testing. A combination of these exploration methods is required at every borrow site. Closely spaced boreholes or test pits are needed to prepare development plans for each site.

Logistics: Frequently during the Program drills may take additional time to investigate river crossings due to the depths of holes, hard rock, steep embankments or breakdowns. As a result, excavated test pits are used instead of boreholes to ensure the program remains on schedule.

Physical: Drill rigs are less capable of negotiating steep terrain than excavators. Consequently in some circumstances test pits are excavated rather than drilling boreholes to reduce disturbance to the access road.

Imperial Response - IR 2.26B (MVEIRB)

Application Name: 2004 Winter Field Geotechnical Investigation Program in the Deh Cho Region

Document Reference: Developer's Assessment Report

Request From: Deh Cho First Nations - Pipeline Working Group

Regulatory Agency Reference: 26B

DAR Section: 5.3, Drilling and Test Pits
PWG IR 4.0

ToR Section: no reference

Imperial Reference: DAR IR 2.26B (MVEIRB)

INFORMATION REQUEST:

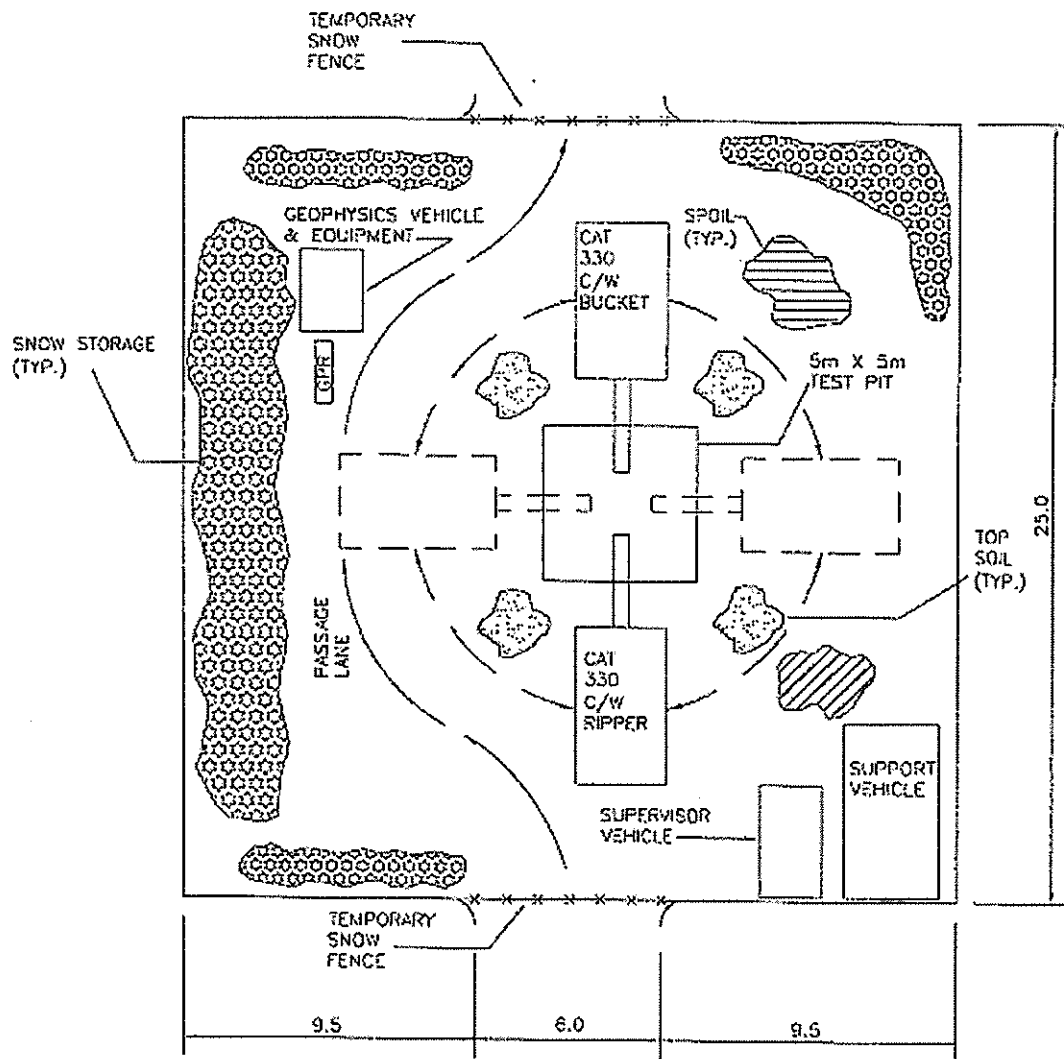
2.26B *Imperial does not explain the decision process for deciding whether or not to drill a borehole or dig a test pit.*

The communities are concerned about size of 25 m x 25 m clearings for the test pits and do not want such clearings created unnecessarily. It would be preferable for Imperial to drill a successful borehole before digging a test pit at any locations

- Please provide the following information:
 - Please provide diagrams justifying the dimensions discussed in PWG IR 4.0.

RESPONSE:

A schematic drawing of a typical clearing for a test pit is attached in Figure 26-1.



**Figure 26-1: Schematic Drawing of a Typical Test Pit
(all dimensions in metres)**

Imperial Response - IR 2.27 (MVEIRB)

Application Name: 2004 Winter Field Geotechnical Investigation Program in the Deh Cho Region

Document Reference: Developer's Assessment Report

Request From: Deh Cho First Nations - Pipeline Working Group

Regulatory Agency Reference: 27

DAR Section: Land Use Permit Application PWG IRs 3.0 and 5.0

ToR Section: no reference

Imperial Reference: DAR IR 2.27 (MVEIRB)

INFORMATION REQUEST:

2.27 *In the LUP application, the camps were described as being used in a consecutive manner with a single 65-person camp starting at the Trout Lake winter road and then being moved first to Fort Simpson and then to Willowlake River.*

However, in the responses to PWG Irs 3.0 and 5.0, Imperial Oil describes these camps being used concurrently with a 65-person camp at Fort Simpson for a 75-day period at the Trout Lake winter road camp.

- For the entire program, please clarify the number, sizes and locations of all camps along with their sequence of use.
-

RESPONSE:

Execution plans for the Program will not be finalized until the contractors have been selected. Current plans call for four (4) temporary camps to be established in the Deh Cho Region in order to conduct the Program. 50 person camps will be established at Checkpoint, near the confluence of the Willowlake River and Mackenzie River and near the confluence of the Blackwater River and the Mackenzie River. A 30 person camp will be established at the future site of the Trout Lake Heater Station, approximately 3 kilometers south of the intersection of the Trout Lake Winter Road and the Enbridge right-of-way.

Current plans split the Deh Cho Region into two (2) work areas: Deh Cho North and Deh Cho South. Commencing in early January, subject to receipt of all regulatory authorizations and weather conditions and two (2) camps will be established in the Deh Cho North Work Area: one near the Willowlake River and one near the Blackwater River. The access and drilling/excavation crews will mobilize from Fort Simpson and move to the Willowlake River camp. Access will be prepared and site investigations will be conducted from that camp. Once the sites have been completed within a 1.5 hour travel time from Willowlake River, the crews will move to the camp that has been established at the Blackwater River. The remaining sites will be investigated from the Blackwater River camp. Once investigation at these sites has been completed, both camps will be demobilized to Fort Simpson.

In the Deh Cho South Work Area, two (2) camps will be established; one at Checkpoint and one at the future site of the Trout Lake Heater Station. Crews will mobilize from Fort Simpson and move to the Checkpoint camp. Access will be prepared and site investigations will be conducted from that camp. Once the sites have been completed with a 1.5 hour travel time from Checkpoint Camp, part of the crew will be moved to the Trout Lake Heater Station camp and the remaining crew members will be demobilized to Fort Simpson. Once investigation of the sites in the southern Deh Cho Region has been completed, both camps will be demobilized to Fort Simpson (no later than spring break-up).

Imperial Response - IR 2.28A (MVEIRB)

Application Name: 2004 Winter Field Geotechnical Investigation Program in the Deh Cho Region

Document Reference: Developer's Assessment Report

Request From: Deh Cho First Nations - Pipeline Working Group

Regulatory Agency Reference: 28A

DAR Section: no reference

ToR Section: no reference

Imperial Reference: DAR IR 2.28A (MVEIRB)

INFORMATION REQUEST:

2.28A *The Ka'aGee Tu First Nation and the Jean Marie River First Nation are concerned about the protection of Jean Marie Creek and Kakisa River, respectively.*

Imperial's MGP applications have 3 crossings of Jean Marie Creek. No crossings of the Kakisa River are identified but it is likely that tributaries of the river are going to be crossed.

The communities want to be assured that pipeline crossings either on these watercourses or on their tributaries will be designed using the best information available.

- Please provide the following information:
 - Please explain why Imperial Oil is not proposing to do any geo technical investigations for pipeline crossings of Jean Marie Creek.
-

RESPONSE:

Geotechnical drilling is conducted at river crossings in order to obtain sub-surface information that can be used to determine the suitability of the site for a potential pipeline crossing that would utilize horizontal directional drilling (HDD). No HDD pipeline crossings are contemplated at any of the three (3) Jean Marie Creek crossings, therefore geotechnical drilling is not required.

Imperial Response - IR 2.28B (MVEIRB)

Application Name: 2004 Winter Field Geotechnical Investigation Program in the Deh Cho Region

Document Reference: Developer's Assessment Report

Request From: Deh Cho First Nations - Pipeline Working Group

Regulatory Agency Reference: 28B

DAR Section: no reference

ToR Section: no reference

Imperial Reference: DAR IR 2.28B (MVEIRB)

INFORMATION REQUEST:

2.28B *The Ka'aGee Tu First Nation and the Jean Marie River First Nation are concerned about the protection of Jean Marie Creek and Kakisa River, respectively.*

Imperial's MGP applications have 3 crossings of Jean Marie Creek. No crossings of the Kakisa River are identified but it is likely that tributaries of the river are going to be crossed.

The communities want to be assured that pipeline crossings either on these watercourses or on their tributaries will be designed using the best information available.

- Please provide the following information:
 - Please confirm that there will be no pipeline crossing of the Kakisa River or its tributaries. If this cannot be confirmed, then please explain why Imperial Oil is not proposing to do any geotechnical investigations on Kakisa River or its tributaries.
-

RESPONSE:

No pipeline crossing of the Kakisa River is contemplated. However, the investigation of potential pipeline routes does include crossing several tributaries of the Kakisa River. Geotechnical drilling is conducted at river crossings in order to obtain sub-surface information that can be used to determine the suitability of the potential site for horizontal directional drilling (HDD). No HDD crossings are contemplated at any of these tributaries; therefore, no geotechnical drilling is required.

Imperial Response - IR 2.29 (MVEIRB)

Application Name: 2004 Winter Field Geotechnical Investigation Program in the Deh Cho Region

Document Reference: Developer's Assessment Report

Request From: Deh Cho First Nations - Pipeline Working Group

Regulatory Agency Reference: 29

DAR Section: no reference

ToR Section: no reference

Imperial Reference: DAR IR 2.29 (MVEIRB)

INFORMATION REQUEST:

2.29 *On July 19, 2004, former Chief Tim Lennie of Pehdzeh Ki First Nation provided a letter to Imperial that stated the community's opposition to work in the vicinity of the Blackwater River, Ochre River and Willowlake River.*

- Please explain what Imperial Oil has done, or will do, in response to this letter including changing the project design and/or identifying alternative project sites.
-

RESPONSE:

Imperial has extended offers to meet with the Pehdzeh Ki First Nation (PKFN) regarding proposed facilities and activities at Blackwater River since becoming aware of this concern in early April of 2004. These offers were extended in letters addressed to PKFN SAO Wilson Dimsdale dated April 11 and 29th 2004. This was again extended in letters addressed to PKFN Chief Tim Lennie dated July 12 and Sept 22 2004. Imperial Oil has recently extended the offer to meet with PKFN in a letter addressed to PKFN Chief David Moses dated October 13, 2004. These letter are attached.

Imperial welcomes the opportunity to meet with PKFN to further clarify our development plans, understand issues and concerns PKFN may have with these plans and work with the community to identify appropriate ways to address their concerns.

2436

Imperial Oil Resources Ventures
Limited
237 Fourth Avenue S.W.
Calgary, Alberta
Canada T2P 0H6

D.F. (Darrell) Becker
Consultations and Community Affairs
Lead - Deh Cho Region
Mackenzie Gas Project

Tel. 403 237 3532
Fax. 403 237 2073

April 11, 2004

Wilson Dimsdale
Pehdzeh Ki First Nation

Re: Request for information

Dear Wilson,

As discussed at the NGO workshop in Yellowknife and again on the phone last week, I have committed to sending you a project information package with the latest information regarding the Deh Cho. I will try and have this package to you within the next 7 - 10 days. (we are currently reformatting the information). Will also look for meeting minutes from last September MOU discussion in Wrigley for possible follow-up.

As noted in our conversations, I believe it best to hold a community meeting (2nd round EIS meeting) to properly scope issues and mitigation options with appropriate MGP experts in attendance. If PKFN won't support such a meeting, I would still propose a smaller meeting with yourself and other PKFN representatives to review the material, answer questions and ensure clear understanding of our plans.

I have also been in discussion with our environmental and engineering people regarding the proposed Blackwater Compressor site as you had noted it is a concern to PKFN. I will be ready to discuss this site with you once I return from vacation April 26th.

Wilson, PKFN should currently have a copy of the large wall map of the proposed Deh Cho route, the smaller (1:30,000) series of routing maps, copies of the Deh Cho infrastructure maps (shows each planned temporary and permanent infrastructure and facility site) and artists sketches of typical compression station. Please advise if these materials are not in your possession and I will add copies to your information package.

If you would like someone to come to the community to review these materials with you (or for a larger community meeting) before I return from vacation, please contact the Fort Simpson office (695-2624) and we will respond.

Wilson, as noted to Chief Lennie, I remain committed to meeting the information needs of your community and look forward to the time where the project can interact freely with Pehdzeh Ki First Nation.

Sincerely,



Darrell Becker

***** -COMM. JOURNAL- ***** DATE APR-11-2004 ***** TIME 15:37 *****

MODE = MEMORY TRANSMISSION

START=APR-11 15:36

END=APR-11 15:37

FILE NO.=395

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001	OK	*	618675813229	002/002	00:00:41

-IOR MACKENZIE GAS PROJECT-

***** -MGP

- ***** - 403 237 2102- *****



Imperial Oil Resources Ventures Limited
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Calgary, Alberta
Canada, T2P 3M9

Mackenzie Gas Project

Fax. 403 237 2102

Facsimile Transmission Cover Sheet

Date: April 11/04

To: Wilson Dimsdale

From: Darren Becker

Company: PKEN

City:

IOR

Telephone:

Calgary

Fax: (867) 581-3229

(403) 237-3532

Number of pages sent including this one: 2

Message:

Wilson, please see letter attached.
D. Becker

NOTICE: If you have received this facsimile in error, any personal use, copying or dissemination of its contents is prohibited. Please notify the sender immediately by telephone at the number indicated on this page to arrange return of the facsimile to the sender. Thank you for your co-operation.

000004
FAX SHEET - MGP

2437

Imperial Oil Resources Ventures
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237 Fourth Avenue S.W.
Calgary, Alberta
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D.F. (Darrell) Becker
Consultations and Community Affairs
Lead - Deh Cho Region
Mackenzie Gas Project

Tel. 403 237 3532
Fax. 403 237 2073

April 29, 2004

Wilson Dimsdale
Pehdzeh Ki First Nation

Re: Request for information

Dear Wilson,

This letter is follow-up to your request for information at the 2nd NGO workshop in Yellowknife and further to the letter sent to you on April 11th.

As noted in the previous letter, I would still welcome the opportunity to visit your community and take the time necessary to complete a thorough, public review of Mackenzie Gas Project development plans in the Deh Cho. This would be the best way to ensure that are plans are well understood by Pehdzeh Ki First Nation and that any issues or concerns from your community are identified for our project team so we can find ways to minimize or eliminate these issues.

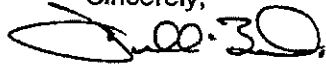
Until the project is given the opportunity to visit in your community, I will ensure that you continue to receive current information regarding project plans. You can expect 4 updated drawings; 1 routing map, 1 infrastructure map for the entire project and 2 infrastructure maps for the Deh Cho region. You will also receive artists sketch of typical compression facility (Blackwater and Trail Rivers) as well as the proposed heater station near Trout Lake. I will also include a booklet describing proposed project plans for the Deh Cho region. As three of these items are currently being updated to reflect our main application filing basis, I will send all out to you as soon as they are available (within 2 weeks).

Regarding your request for our response to issues raised in meetings held last September in Wrigley, I have reviewed the minutes from the community (late afternoon) meeting and could see no issues remaining for follow-up. The material to be provided to you will add more clarity on some of the questions concerning number and location of access roads.

I discussed the meeting regarding an MOU for winter work with Norm Tatlow (as I was not in attendance) and he is unaware of any specific follow-up from this meeting that wasn't dealt with at subsequent meetings with the Deh Cho Pipeline Working Group.

Please reply with specific questions you feel are outstanding and I will get a response back to you as soon as possible.

Sincerely,



Darrell Becker

***** -COMM. JOURNAL- ***** DATE APR-29-2004 ***** TIME 16:40 *****

MODE = MEMORY TRANSMISSION

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END=APR-29 16:40

FILE NO.=580

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-IOR MACKENZIE GAS PROJECT-

***** -MGP

- ***** - 403 237 2102 -*****



Imperial Oil Resources Ventures Limited Mackenzie Gas Project
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Fax. 403 237 2102

Facsimile Transmission Cover Sheet

Date: Apr 29/04

To: WILSON DIMSDALE

From: DARREN BECKER

Company: PEABODY Ki FIRST NATION

IOR

City: 8

Calgary

Telephone: (867) 581-3321

(403) 237-3532

Fax: (867) 581-3229

Number of pages sent including this one: 2

Message:

Wilson, please see attached letter
and call my cell (403 651 8181) if you
would like to discuss.

NOTICE: If you have received this facsimile in error, any personal use, copying or dissemination of its contents is prohibited. Please notify the sender immediately by telephone at the number indicated on this page to arrange return of the facsimile to the sender. Thank you for your co-operation.

Imperial Oil Resources Ventures
Limited
237 Fourth Avenue S.W.
Calgary, Alberta
Canada T2P 0H6

D.F. (Darrell) Becker
Consultations and Community Affairs
Deh Cho Region
Mackenzie Gas Project

Tel. 403 237 3532
Fax. 403 237 2073

July 12, 2004

Chief Tim Lennie
Pehdzeh Ki First Nation
Wrigley

Re: updated project information

Dear Chief Lennie,

The Mackenzie Gas Project continues to refine its plans as a result of input from many areas. This input is from a number of ongoing studies (ie; Traditional Knowledge, Environmental, and Engineering) as well as direct feedback from communities and other land users.

To help ensure your community is kept current, we have developed some additional and updated information for your use. This information reflects the most recent plans of the Mackenzie Gas Project.

You will find updated maps as well as two publications.

The maps include:

- (1) revised version (large wall map) of the proposed routing in the Deh Cho showing the development corridor (dwg # 249-01 rev D).
- (1) infrastructure maps showing proposed development locations in the Deh Cho (dwg # 321-003/4 rev D)
- (2) revised bound copy of 1:30,000 scale maps (53 maps) showing route detail through the Deh Cho (titled 'Proposed Deh Cho Pipeline Routing' - May 2004)

The 'booklet' type publications include:

- (2) document titled 'Project Illustrations' - June 2004. This is meant primarily for people who have had limited experience with our industry and is intended to help visualize what the activities involved in pipeline construction could look like.
- (2) document titled 'Deh Cho Project Plans'. This document is meant to help communities better understand the execution plans the Project has in the Deh Cho. These plans are also shown in four geographical segments to help communities focus on their traditional areas or specific areas of interest.

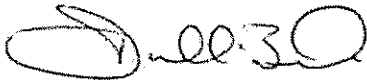
If you would like additional copies of these materials, please let me know.

We remain ready to come to Wrigley to discuss these plans with the Pehdzeh Ki First Nation as well as any concerns your membership may have with these plans. We are also waiting for the opportunity to visit your community to discuss the Project Permit Applications (PPA's) which provides further detail on a site by site basis.

I understand that Pehdzeh Ki First Nation has concerns with the proposed compressor site near Blackwater River. As indicated in my letters to Wilson Dimsdale April 11th and April 29th, the MGP is prepared to review this particular site and to look at options with you at your request.

The MGP remains committed to full involvement of the community leadership, elders, harvesters and other land users in helping to identify and resolve concerns related to our project. I remain hopeful that we can find a way to engage your stakeholders while the PWG continues to work other pipeline-related issues.

Sincerely,

A handwritten signature in black ink, appearing to read "Darrell Becker", with a stylized flourish at the end.

Darrell Becker

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237 Fourth Avenue S.W.
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D.F. (Darrell) Becker
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Deh Cho Region
Mackenzie Gas Project

Tel. 403 237 3532
Fax. 403 237 2073

September 22nd, 2004

Chief Tim Lennie
Pehdzeh Ki First Nation
Fax (867) 581-3229

Re: Request for community meeting

Dear Chief Lennie,

On May 31st of this year, I sent you a letter requesting the opportunity to hold a two-day meeting in your community. The intent of this meeting was to hold a one-day workshop with elders and harvesters followed by a one-day open house meeting to review in detail the project plans on Pehdzeh Ki First Nation traditional lands. This would use the Project Permit Applications (PPA's) detail as the basis for discussion.

We have been waiting through a series of decision points over the past few months, which it was explained to me may have allowed PWG/Corridor Communities to engage in this process. Examples of these decision points were: Kakisa Assembly (June/July), various meetings with Federal officials concerning JRP representation (July/Aug) and PWG membership meeting (late Aug). Once again, I would like to offer to meet and execute consultations as outlined in my letter from May (attached). I would also like to add an additional day for an open house meeting to allow for introduction to the proposed 2005 winter work program and a report-out of the Environmental Impact Statement (EIS) findings.

From your letter to Imperial Oil dated July 19th 2004, it is clear that your community has concerns with some of our development plans, particularly in the Blackwater River, Ochre River and Willowlake River areas. This proposed three-day meeting would allow for an excellent opportunity to further explore these issues, any mitigation options we may have or alternatives we may want to consider.

We would compensate the participants of the one-day elder and harvester workshop in the same fashion as the EIS workshop held in Fort Simpson in May.

The community open house meetings the following two days would make this information available to community residents to increase their knowledge of the project and help identify concerns and issues with our plans.

The material to be covered would include proposed watercourse crossings, all major infrastructure and facility sites, water use plans, access road plans and current logistics and construction plans.

We also offer short-term employment for two community residents through your Band office to support follow-up PPA consultation on a one to one or small group basis in your community. We would expect the duration of this work to be 2-3 weeks.

We have updates to some of the information provided to you in July (Project Plans and infrastructure maps) as well as details on the PPA's (booklet and maps) that we will send you copies of within the next 1-2 weeks. We would like the opportunity to review these changes and new material with your community during this proposed meeting.

As indicated many times in the past, we continue to look forward to the opportunity to work cooperatively and productively with corridor communities and individual land users in further identifying issues and concerns with our plans and make changes and/or add mitigation steps to alleviate these concerns. We take the responsibility to inform and consult very seriously and would certainly prefer to work collaboratively in the communities to resolve as many concerns as possible prior to any potential hearing process.

I will contact your office during the next week to follow-up on this request.

Sincerely,

A handwritten signature in black ink, appearing to read "Darrell Becker", with a stylized flourish at the end.

Darrell Becker

cc. Bob Norwegian

MODE = MEMORY TRANSMISSION

START=SEP-22 12:09

END=SEP-22 12:11

FILE NO.=065

STN NO.	COMM.	ONE-TOUCH/ ABBR NO.	STATION NAME/TEL NO.	PAGES	DURATION
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-FOR MACKENZIE GAS PROJECT-

***** -MGP

- ***** -

403 237 2102- *****

Imperial Oil Resources Ventures
Limited
237 Fourth Avenue S.W.
Calgary, Alberta
Canada T2P 0H6

**Mackenzie
Gas Project**

Fax

To:	Chief Tim Lennie	From:	Darrell Becker
Company:	Pehdzeh Ki First Nation	Company:	Mackenzie Gas Project
City:	Wrigley	City:	Calgary
Telephone:		Telephone:	(403) 237-3532
Fax No:	(867)581-3229	Fax No.	(403) 237-2073

Number of pages sent including this one: 5

Message:

Chief Lennie, please find attached a letter requesting meetings with your community. The meeting is intended to provide for review of project plan details and updates to previous information.

Please call me at (403) 237-3532 if you have any questions or concerns

Darrell

Imperial Oil Resources Ventures
Limited
237 Fourth Avenue S.W.
Calgary, Alberta
Canada T2P 0H6

D.F. (Darrell) Becker
Consultations and Community Affairs
Deh Cho Region
Mackenzie Gas Project

Tel. 403 237 3532
Fax. 403 237 2073

October 13, 2004

Chief David Moses
Pehdzeh Ki First Nation
Fax (867) 581-3229

Re: 2005 Winter Work Application

Dear Chief Moses,

Please find enclosed a binder titled 'Deh Cho Winter 2005 - Geotechnical Investigation - Field Operations Plan'. This material is to allow for review of this proposed program prior to our submission of the Land Use Application for this program.


Please note that the attached maps indicate the new sites we would like to investigate but the execution plan is designed to complete the work scope of the 2004 geo-technical application (currently undergoing an environmental assessment) as well as these proposed new sites.

Whereas the 2004 program is focussed on granular deposits and river crossings, these new site investigations (2005 program) are required to determine the foundation requirements at proposed facility and infrastructure sites and confirm soil type/characteristics at various points along the proposed route.

I remain available to meet with your representatives or as a community to discuss this application and any concerns with scope, execution plan, individual sites or proposed access. This could be combined with a larger meeting (as per my letter to former PKFN Chief Tim Lennie dated September 22nd '04) or a separate meeting at your preference.

I will contact your office during the next week to follow-up on this request.

Sincerely,



Darrell Becker

cc. Bob Norwegian

Imperial Response - IR 2.30 (MVEIRB)

Application Name: 2004 Winter Field Geotechnical Investigation Program in the Deh Cho Region

Document Reference: Developer's Assessment Report

Request From: Deh Cho First Nations - Pipeline Working Group

Regulatory Agency Reference: 30

DAR Section: Section 9.1, Economic Impacts and Mitigation

DR 1.2

PWG IR 5.0

ToR Section: no reference

Imperial Reference: DAR IR 2.30 (MVEIRB)

INFORMATION REQUEST:

2.30 In DAR Section 9.1, Imperial states: "Imperial intends to source potable water from the community nearest the operations, where feasible".

In DR 1.2, Imperial states: "Imperial intends to purchase potable water from local sources in the communities nearest the operations."

In PWG IR 5.0, which concerned the Trout Lake Camp, Imperial states: "Water trucks will be used to supply potable water supplies form Fort Simpson".

DAR Section 9.1 and DR 1.2 conflict with PWG IR 5.0

- Please explain where, and why, potable water will be sourced for all of the proposed camp locations.

RESPONSE:

Imperial intends to purchase potable water from the communities nearest the camps whenever feasible. The water will be hauled by truck from the communities to the camps. A factor in a commercial arrangement to provide potable water will be the Program's requirement to dispose of sewage and grey water at sewage treatment facilities, preferably in community facilities nearest the camps. Potable water supply and sewage disposal are often provided in the same contract. Negotiations for the supply of potable water and the use of sewage treatment facilities have not commenced.