



**Introduction**

As requested, the Round 2 Information Request (IR) responses submitted to the MVEIRB by Environment Canada, for the Paramount Cameron Hills EA.

**IR Number: 1.2.1**

**Source: GNWT**

**To: Environment Canada (Canadian Wildlife Service)**

**Preamble: Species at Risk Act (SARA)**

**Environment Canada (Canadian Wildlife Service) Response:**

The Canadian Wildlife Service has requested that an extension be given to address this information request. We anticipate a formal response to the board in early February.

**IR Number: 1.2.45**

**Source: KTFN**

**To: Environment Canada  
GNWT, INAC**

**Preamble: Species content of Certified Canada Seed #1**

**Environment Canada (CWS) Response:**

**a) Are the species identified indigenous to the project area?**

The Canadian Wildlife Service has no expertise in this area and defers to the GNWT.

**b) What is your organization's policy on the use of non-indigenous plant species?**

The Canadian Wildlife Service advocates the use of native species for re-vegetating purposes, further; we advocate the use of **local cultivars** (varieties) grown in the Northwest Territories or at least Canada. Cultivars from other jurisdictions (i.e. the United States) may not be adapted to the harsh Canadian environment.

**d) Are there any concerns with the species that have been identified?**

The Canadian Wildlife Service has no expertise in this area and defers to the GNWT.

**e) What is your organization's policy on acceptable rutting depth?**

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The Canadian Wildlife Service has no expertise in this area and defers to the GNWT.

**IR Number:** 1.2.50  
**Source:** KTFN  
**To:** Environment Canada

**Preamble:** Windrow Breaks

**Environment Canada (CWS) Response:**

- a) Explain whether or not your organization agrees that the proposed windrow break spacing is sufficient to achieve the dual purposes stated by Paramount.

The Canadian Wildlife Service finds the proposed windrow break spacing to be acceptable.

- b) If no, then what does your organization believe is the minimum acceptable distance?

Not applicable.

- c) Provide the rationale for your proposed spacing.

Not applicable.

**IR Number** 1.2.51  
**Source** KTFN  
**To:** Environment Canada

**Preamble:** Paramount is proposing to dispose of drill cuttings in remote pits

**Environment Canada (Environmental Protection Branch) Response:**

- a) Summarize any information or research that EC has as to the effectiveness of remote pits to contain contaminants in drill cuttings.

Attached is a selective bibliography which highlights the areas of knowledge that are related to drilling waste in the North. Due to the limited amount of northern research, Environment Canada has concerns with the use of in-sumps in the Northern regions. In addition, an informal review of current and historic northern sump sampling techniques, monitoring methods, reporting formats and archiving systems have demonstrated that information collected regarding in-ground sumps is significantly varied, disjointed and difficult to collate. Environment Canada believes it is critical for all parties involved to develop coordinated reporting methods that the advance scientific knowledge and are

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meaningful for environmental management purposes (e.g.: cumulative impacts and environmental risk assessment).

**b) Describe any concerns that EC has with regards to Paramount's proposed method of disposing drill cuttings as described in the DAR and in Paramount's responses to IR 1.1.17 and 1.1.35.**

1. Environment Canada has concerns with the limited background information provided on soil type, permafrost zones, and depth of active layer specific to the final in-ground sump/remote pit location. Such data is critical in determining the short and long term performance of the sump on the surrounding environment (e.g. permafrost impact and contaminant/migration). The design criteria for the remote pits should be appropriate, minimizing the footprint and surface impacts.

**2. DAR 3.4.2.2**

The Indian and Northern Affairs Canada's *Environmental Operating Guidelines: Hydrocarbon Well-sites in Northern Canada* (1986) and the Alberta Energy and Utilities Board *Guide 50: Drilling Waste Management* (1996) guidelines were developed to communicate the best operating practices to protect the environment, and reduce the overall extent of the land surface disturbance. The proponent is advised to adhere closely to the requirements of these guidelines, as well as to be cognizant of and adhere to any industry best practices that are developed subsequent to these guidelines. Notwithstanding this, waste management and operating guidelines are subordinate to all existing acts, regulations, and terms and conditions of permits.

**IR Number: 1.2.129**

**Source: MVEIRB**

**To: Environment Canada, GNWT, INAC**

**Preamble:** Policy related to air quality applicable in the development area (and the Mackenzie Valley in general) includes Air Quality Standards set out under the territorial Environmental Protection Act. The environmental management of impacts often requires effective monitoring, inspection, and enforcement. It is unclear how this is presently done with respect to air.

**Environment Canada (Air Quality Section) Response:**

**a) Specify what binding legal air quality guidelines or standards your organization is responsible for.**

Environment Canada does not have specific standards for ambient air quality. There are, however, a number of regulations under the Canadian Environmental Protection Act (CEPA) that impact on ambient air quality. These regulations include: Gasoline; Benzene in Gasoline; Sulphur in Gasoline; Sulphur in Diesel Fuel; Off-Road Small Spark-Ignition Engine Emission; On-Road Vehicle and Engine Emission; Secondary Lead Smelter Release; Solvent Degreasing; Tetrachloroethylene; and, Vinyl Chloride Release regulations.

As well, Canada (with the other provinces and territories, excepting Quebec) is a signatory to the Canada-wide Standard (CWS) sub-agreement to the Canada-wide Accord on Environmental Harmonization. Under this sub-agreement, a number of Canada-wide Standards have or are being developed which will impact on ambient air quality, although these are not legally binding commitments. For example, all signatories have committed to meeting ambient air quality standards for particulate matter and ozone within their jurisdictions by the year 2010.

The federal government, the provinces and the territories cooperatively established National Ambient Air Quality Objectives (NAAQOs) for Canada through the Canadian Council of Ministers of the Environment for five common pollutants: sulphur dioxide; suspended particulate; ozone; carbon monoxide; and nitrogen dioxide. These objectives are target levels, defined to provide protection for humans, other life-forms, and/or inanimate objects such as soil and water. There are also CEPA guidelines and codes of practice, such as the New Source Emission Guidelines for Thermal Electricity Generation, which indirectly impact on air quality. These objectives, guidelines, and codes of practice are not legally binding, but may form the basis for laws and regulations.

**b) Specify if regular compliance inspections for air quality are conducted by your organization to ensure that developments in operation are meeting those standards. If your organization does not conduct such inspections, please specify who currently is responsible for doing so.**

Because Environment Canada does not have ambient air quality regulations and does not issue permits for stack emissions, compliance inspections are not conducted. As noted above, a number of regulations under CEPA indirectly impact on air quality, and Environment Canada undertakes compliance, inspection, and enforcement activities related to these regulations. These regulations may also include reporting requirements. As well, the National Pollutant Release Inventory (NPRI) requires the reporting of facility-specific information regarding on-site releases and off-site transfers of 268 substances listed on the inventory. Companies that manufacture, process or otherwise use one of the listed substances, and meet the reporting thresholds, must report their releases or transfers to Environment Canada annually. The information is used by the department in its toxics management programs, and is made publicly available to Canadians each year.

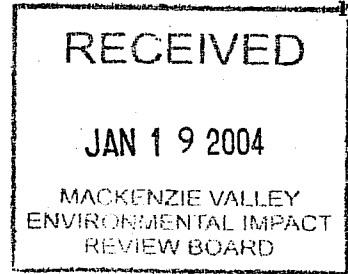
It is noted that the National Energy Board (NEB) and the Mackenzie Valley Land and Water Board have the authority to issue permits, and these may provide opportunities to address issues relating to air quality.

**c) Specify if your organization is responsible for air quality enforcement, and if so, exactly how it is currently done. Provide examples.**

Please see comments above.

***Bibliography of Permafrost and Drilling Waste  
Studies as Pertaining Toward the Use of Sumps in  
the Mackenzie Delta Region***

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