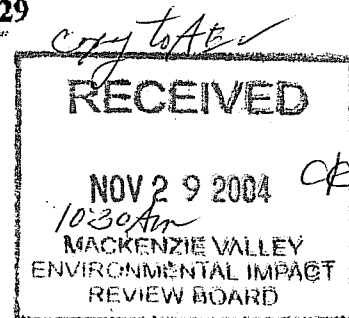




Pehdzeh Ki First Nation
GENERAL DELIVERY
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Saturday, 27 November 2004

Alan Ehrlich
Mackenzie Valley Environmental Impact Review Board
Box 938, 200 Scotia Centre, (5102-50th Avenue),
Yellowknife, NT. X1A 2N7
Fax: (867) 766-7074



To Mr. Ehrlich;

RE: EA03-009 Imperial Oil Geotechnical Program in the Dehcho Region

Please find attached a presentation that the Pehdzeh Ki First Nation Pipeline Working Group would like to present at the Wrigley public hearing December 1, 2004.

Our presentation is a 17 page summary of PKFN impacted sites arising from the EA03-009 Imperial Oil Geotechnical Program in the Dehcho Region and using only the Pehdzeh Ki First Nation's traditional use area. Of which is Sixty-seven percent of the identified areas of impact for the aforesaid application are on Pehdzeh Ki First Nation's Traditional Lands.

PKFN will also have two other presentations both orally, one from the elders and the other from the community. We would also like to be asking some questions with regards to other concerns that have arisen from our presentations.

PKFN would also request that leader and former Chief Tim Lennie makes an oral presentation at the Fort Simpson hearing December 2, 2004 as he will be a wealth of information that needs to be taken into consideration.

Mahsi Cho
Chief Dave Moses

C.c PKFN PWG
DAS

Draft Presentation

For:

EA03-009 Imperial Oil Geotechnical Program in the Dehcho Region

Submitted to:

Mackenzie Valley Environmental Impact Review Board

Submitted by:

Pehdzeh Ki First Nation Pipeline Working Group

November 26th, 2004

The Pehdzeh Ki First Nation is deeply concerned about what the impacts might be and or will be created from this project *EA03-009 Imperial Oil Geotechnical Program in the Dehcho Region*. We are just now being able to realize and gather some understanding and capacity for and there of as in regards to the magnitude of development ahead. The proponent of this application will set the stage in motion to have our Traditional Lands as well as our way of life changed forever. More to the point, we are alarmed that if our way of life, culture, ideas, concern, and TK are not mitigated into the application as soon as possible the relation these winter works have to the MGP will make them null and void. For this reason we formed our own pipeline working group and will work in parallel with and as part of the Dehghah Alliance Society to ensure our way of life is preserved forever, we hope.

The Pehdzeh Ki First Nation Pipeline Working Group held a two day work shop with Pehdzeh Ki Band Council and community to conform all the available known reliable information, other workshops, Imperial's winter works application, consultation, Traditional Knowledge, and compensation agreements so we can have an idea of the impact that is ahead of us on our lands. The rationale for this was to identify what sites are acceptable by The Pehdzeh Ki First Nation's People for the winter work proposed in this application.

We only have the time and resource to study and identify the ecological impacts of the winter works sites only. The considerable social –economical, safety, engineering, and other impacts for this application are yet too vast for comprehension by our people.

First of all we are greatly concerned with the proponent's negligence to address the Blackwater project area work adequately. We have requested, various times, to be consulted with them many times about the great significance of this area being spiritually, culturally, and ecologically beyond measure to our people. This area is a treasure trove of biodiversity as this presentation will prove. We have appealed many times that there is at least a 15 kilometre buffer zone on both the north and south sides of the Blackwater River. Yet the proponent still seeks to explore in this area for development and this is not acceptable by The Pehdzeh Ki First Nation's People.

The two maps (pg.15, 16) in the presentation have decidedly useful insightful and the PKFN people believe they will be of considerable value to the board as verification. So much so, that data on these maps has never been released before without a sign confidentially agreement.

We have broken all the winter works down into individual impacted sites so that our people and community can and did then decided which were appropriate and which are not. Each impacted site was detailed into the following descriptions Site ID (a), Application Tab (b), Pipeline KP (c), Location Description (d), Access Route (e), Community Knowledge and Use of Area (f), and Acceptability.

Winter works Camps

There is some confusion of winter camp sites for this application, the Pehdzeh Ki First Nation has requested that there not be allowed any camp within the fifteen kilometre buffer zone. Former Chief Tim Lennie has request many a times for the Blackwater area to be a hands off site. This is a significant cultural meeting place and has many spiritual sites (sacred rock, people turn to stone), harvest area (moose pastures, caribou migration zone) as well as a managed candidate protected area.

In IR 2.27 the proponent says there are now only two camps plan for the winter works Willow Lake and Blackwater River. Yet the proponent's subcontractor contacts us Friday November 26, 2004 to arrange for a suitable location* for the Wrigley camp?

A; Blackwater River

B; Tab LUP 5

C; 697

D; 4-hectare site beside the Mackenzie Highway winter road, about 0.5 km east of the Mackenzie River and 1 km north of the Blackwater River. Level terrace. Shrub/low brush clearing will be necessary with some salvaging and decking of merchantable timber.

E; Access is directly from the Mackenzie Highway winter road.

F; Moose pasture, Good wildlife habitat and denning sites. Cultural meeting place, Spiritual sites (sacred rock, people turn to stone). Local residents hunt bear caribou, and moose. Cultural

Not Acceptable

A; Wrigley

B; LUP Tab 28

C; 790

D; 4-hectare site beside the Mackenzie Highway winter road, about 2 km east of Wrigley. The site is an old camp location. Flat terrain with a cover of mixed forest and shrubs. Well-drained with no evidence of surface water.

E; Access is directly from the Mackenzie Highway winter road.

F; Good wildlife habitat and potential denning sites. Used for hunting by local residents.

Acceptable * Location .5 km south of 808 KP.

A; Willowlake River

B; LUP Tab 39

C; 858

D; 4-hectare site beside the Mackenzie Highway about 3.75 km south of the Willowlake River bridge. Level terrain. Well-drained. Mixed wood forest of pine and spruce.

E; Access is directly from the Mackenzie Highway.

F; Good wildlife habitat.

Acceptable at the old bridge construction site

Frost Heave (HP)

A; FH 12

B; LUP Tab 1

C; 690

D; Between the pipeline route and the winter road, about 2 km from the Sahtu border. About 3.5 km from the Mackenzie River. Flat terrain with mostly muskeg and shrub vegetation. Low area that may have ponding.

E; 720 m of new access from the winter road.
Flat muskeg. Low scrub. No merchantable timber. No lakes or watercourse need to be crossed.

F; Used by numerous wildlife species, particularly moose. Community harvest area.

Acceptable

A; FH 13

B; LUP Tab 12

C; 720

D; On the pipeline route (and beside the Enbridge ROW), 32 km from the Sahtu border. 21 km south of Blackwater River and 39 km north of Ochre River. About 5.5 km from the Mackenzie River. Flat terrain. Scrub pine/spruce and muskeg.

E; 500 m of new access from the winter road, along an existing cut line for 4 km then 1.5 km along the Enbridge ROW. Some brush will need to be cleared. Either snow or ice road.

F; Good wildlife habitat.

Acceptable

A; FH 14

B; LUP Tab 14

C; 739

D; On the pipeline route (and beside the Enbridge ROW), 49 km from the Sahtu border. 40 km south of Blackwater River and 20 km north of Ochre River. About 6 km from the Mackenzie River.

E; Flat terrain. Scrub spruce and muskeg. No lakes or watercourses.
6 km along an existing cutline from the winter road to the Enbridge ROW. Clearing and brush removal will be required close to the winter road. Either snow or ice road.

F; Used by numerous wildlife species.

Acceptable

A; FH15

B; LUP Tab 22

C; 777

D; On the pipeline route (and beside the Enbridge ROW), about 0.5 km north of Hodgson Creek and 13 km north of Wrigley. About 9 km from the Mackenzie River. Flat terrain. Spruce trees but no merchantable timber.

E; 3.5 km along an existing cutline from the winter road to the Enbridge ROW. 7 km south along the ROW. Clearing and brush removal will be required. Either snow or ice road.

F; Good wildlife habitat and denning sites. Eagle nests, Caribou migration trails.

Acceptable

A; FH 16

B; LUP Tab 24

C; 782

D; Between the winter road and the pipeline route. About 1 km west of Hodgson Creek and 7 km north of Wrigley. About 4.5 km from the Mackenzie River. Low lying area with scattered spruce and poplar.

E; 2.4 km of new access north-easterly from the winter road. Flat to undulating terrain. Crosses a tributary of Hodgson Creek. Either snow or ice road.

F; Good wildlife habitat and potential denning sites.

Acceptable

A; FH 17

B; LUP Tab 31

C; 800

D; On the pipeline route (and beside the Enbridge ROW) about 11 km southeast of Wrigley. About 2 km from the Mackenzie River. Flat terrain. Spruce forest with shrubs.

E; 1 km along an existing cut line from the highway to the Enbridge ROW. 1.7 km north along the ROW. Clearing and brush removal will be required.

F; Good wildlife habitat and potential denning sites. Area is used by residents for hunting. **Not Acceptable-** The work is too close to town and the Pehdzeh Ki First Nation wants the line move toward to Enbridge pipeline starting from KP 785 line.

A; FH 18

B; LUP Tab 45

C; 943

D; 5 km northeast of the pipeline route and about 42 km northwest of Fort Simpson. About 15 km from the Mackenzie River. Flat and poorly drained with stunted scrub vegetation.

E; 55 km west of Fort Simpson along the Enbridge ROW, 16.3 km north along an existing cut line and 1.3 west along another existing cut line. Clearing and brush removal will be required. 3 watercourse crossings.

F; Good wildlife habitat including denning sites. Extensive use of the area for hunting, trapping, fishing and general recreational use by residents.

Acceptable

Borrow Sites

This high concentration of sites in the Blackwater area reinforces our concerns for this special of all places, once again. Here we grouped the first six impacted sites together.

A; 9.038PA, 9.038PB, 9.091P, 9.044PA, 9.044PB, 10.001P

B; LUP Tab 2, LUP Tab 3, LUP Tab 6, LUP Tab 7, LUP Tab 8, LUP Tab 9

C; 692, 692, 701, 702, 700, 704

D; 1) West of the Mackenzie Highway winter road, about 0.5 km from the Mackenzie River and 3 km south of the Sahtu border.

2) West of the Mackenzie Highway winter road, about 2.5 km from the Mackenzie River and 1 km south of the Sahtu border. Site is adjacent to wetland/marsh drainage so a buffer area is required. The area does feed a small creek.

3) About 0.5-1.5 km west of the Mackenzie River and about 1.5 km south of where the Blackwater River enters the Mackenzie. Two unnamed creeks bordering the area require buffer zones. No open water flow within the site.

4) Located about 1 km east of the winter road and 1 km west of the Blackwater River. About 4 km south of where the Blackwater River enters the Mackenzie. No open water flow on the site but a buffer must be maintained to protect the Blackwater River from siltation during site access.

5) Located about 1.5 km east of the winter road and 0.5 km south of the Blackwater River. About 2.5 km east of where the Blackwater River enters the Mackenzie. A buffer must be maintained to protect the Blackwater River from siltation during site access.

6) Located on both sides of the winter road about 1 km from the Mackenzie River. About 5 km south of where the Blackwater River enters the Mackenzie.

E; 1) About 2.5 km of new access SW from the winter road.

2) About 1.75 km of new access NNW from borrow site 9.038PA.

3) About 1.25 km along a cut line from the winter road, 2.2 km crossing of the Mackenzie River and then 800 m of new access on the west bank of the Mackenzie.

4) 2.25 km SE along existing cut lines from site 9.044PB. Significant clearing will be required. Recoverable timber will be salvaged and decked

5) 1.8 km ENE of new access from the winter road

6) Access will be directly from the winter road.

F; 1) Supports numerous wildlife species and moose in particular. High with known resources within 5 km.

2) Supports numerous wildlife species, especially moose, which are hunted in this area. High with known resources within 5 km.

3) Provides good wildlife habitat, especially for moose, and denning sites for bears. High with known resources within 2 km.

4) Provides good wildlife habitat, including denning sites for bears. Local residents use the area for hunting. High with known resources within 2 km.

5) Provides good wildlife habitat, including denning sites for bears. Local residents use the area for hunting. High with known resources within 2 km.

6) Provides good wildlife habitat, including denning sites for bears. Local residents use the area for hunting. Caribou, deer and wolf tracks were observed in the area. Moderate with known resources within 5 km.

Not Acceptable – This area of Blackwater has burial sites link at two of the borrow locations. This is also an extremely significant cultural meeting place and has many spiritual sites (sacred rock, people turn to stone), harvest area (moose pastures, caribou migration zone) as well as a managed candidate protected area.

We are also to the highest degree troubled about the impact on our lands in this area once again as we believe that these many impacts could push this area to beyond the ecological thresholds (point of no return).

A; 10.003P

B; LUP Tab 10

C; 713

D; About 3.5 km east of the winter road and 1 km east of the proposed pipeline route. About 14 km south of where the Blackwater River enters the Mackenzie River.

E; 500 m of new access east from the winter road, 3.75 km NE along an existing cutline, 5.3 km NW along the Enbridge ROW and 0.9 km NE along an existing cutline.

F; High country is caribou summer range. Caribou use this area and migrate along the valley. Provides good wildlife habitat, including denning sites for bears. Local residents use the area for hunting.

Acceptable

A; 10.004P

B; LUP Tab 11

C; 715

D; Located just east of the winter road and about 0.7 km east of the Mackenzie River. About 16 km south of where the Blackwater River enters the Mackenzie.

E; Access will be directly from the winter road

F; Stands of black spruce with abundant shrubs including cranberry and bearberry. Some evidence of caribou use. Provides good wildlife habitat, including denning sites for bears. Local residents use the area for hunting and trapping. A number of cabins in the area. High with known resources within 10 km.

Acceptable

A; 10.007P

B; LUP Tab 13

C; 732

D; Located just east of the winter road and about 0.5 km east of the Mackenzie River. Vermillion Creek crosses the south end of the site. Sedimentation into Vermillion Creek will need to be prevented.

E; 200 m of new access east from the winter road. Likely snow road only.

F; Good wildlife habitat. Local residents use the area for hunting and trapping. High with known resources within 2 km.

Acceptable

The next three winter works impacted sites are grouped together.

A; 10.013P, 10.014AP, 10.020P

B; LUP Tab 15, LUP Tab 17, LUP Tab 18

C; 747, 752, 758

D; 1) Located about 1 km east of the Enbridge ROW and about 7 km east of the winter road. A potential rock quarry located on a cliff outcrop to the southeast of Whitesands Creek. Part of a group of rocky hills, this site has been quarried previously.

2) Located about 0.5 km east of the winter road and 1 km east of the Mackenzie River. The site is bordered on the south by Whitesands Creek.

3) Located beside (east side) the winter road and 1 km east of the Mackenzie River. The site is 1.5 km from the Ochre River to the south and southeast.

E; 1) Another 8.5 km SE along the Enbridge ROW and then 850 m of new access up the hillside.

2) 650 m ENE of new access from the winter road.

3) Access directly from the winter road.

F; 1) Area supports numerous species of wildlife. Caribou habitat and harvest area. Trail along the bottom of the outcrop.

2) Some cranberry and bearberry. Excellent habitat for marten. Evidence of moose Provides good wildlife habitat, including denning sites for bears. Local residents use the area for hunting. High with known resources within 2 km

3) Good moose habitat. Cranberry is abundant. Raspberries beside the pit. Provides good wildlife habitat, including denning sites for bears. Local residents use the area for hunting and trapping. High with known resources within 2 km.

Not Acceptable- This area of impacted sites is a prime community harvest area and has trap lines. Moose, bear, caribou, and martin are abundant.

A; 10.022P, 10.030P, 10.033P

B; LUP Tab 20, LUP Tab 21, LUP Tab 23

C; 762, 774, 778

D; 1) Located about 0.5 km west of the winter road and 0.5 km east of the Mackenzie River. The site is 1 km south of where the Ochre River enters the Mackenzie River.

2) Located beside the Enbridge ROW and about 4.5 km east of the winter road. 15 km north of Wrigley and 3 km north of Hodgson Creek.

3) Located beside the Enbridge ROW and about 0.5 km south of where the Enbridge pipeline crosses Hodgson Creek. 11 km north of Wrigley.

E; 1) 550 m of new access from the winter road. Likely snow road.

2) 6.25 km of existing outlines from the winter road and 4 km along the Enbridge ROW.

3) 1.4 km farther along the Enbridge ROW from frost heave site FH 15. A crossing of Hodgson Creek is required.

F; 1) Local residents use the area for hunting and fishing. High with known resources within 2 km.

2) Area is a travel corridor for caribou. Provides good wildlife habitat, including denning sites. Moderate with known resources within 10 km.

3) Excellent moose habitat. Evidence that bears, wolves, moose and caribou use the area.

Acceptable

A; Sites 10.037P to 10.038PA

B; LUP Tab 25, Tab 26, Tab 27

C; 788 to 790

D; Located 0.5 km from the Mackenzie River and 3.5 km NW of Wrigley to South of Hodgson Creek and just outside of Wrigley.

E; 5.6 km ice road on the Mackenzie from Wrigley to the west bank of the Mackenzie just north of the Wrigley River. Then 3.5 km along existing outline. 200 m of new access required.

F; Caribou marten, and rabbit habitat. A wildlife travel corridor.

Not Acceptable- This work is too close to our community and we have requested the proponent to move the line away from the community towards the Enbridge line.

The next five sites are fine with the Pehdzeh Ki First Nation and therefore we will not comment.

A; 20.015P

B; LUP Tab 38

C; 856

D; Just west of the highway and 0.5 km from Willowlake River.

The site is a relatively flat plain containing sand above the south bank of Willowlake River near where it enters the Mackenzie River. Cranberry and grasses dominate the ground cover.

E; Less than 200 m of new access. Access crosses a well-drained gravel plain with no watercourses.

F; Prime habitat for numerous species moose. Provides local residents use the area as primary site for hunting and fishing. High with known resources within 2 km.

Not Acceptable - This area is one of our communities' primary sites for hunting and fishing. It is also under interim protection as a protected area (Edehzie).

There are also old Archlogical and Historical sites such as Old Fort Alexander.

The next six winter works sites are filled with trap lines from our community as well as moose pastures and excellent stands of timbers.

We feel that as long as the proponent is negotiating an MOU that these impacted sites can be effectively mitigated.

A; 11.019P to 20.018

B; LUP Tab 40 to Tab 42

C; 883 to 950

D; 1 km east of the highway and about 50 km from Camsell Bend to Located beside the Enbridge ROW about 1.5 km from the east bank of the Mackenzie River.

E; 1.5 km of existing access from the highway to Continuation of the access to borrow site 11.067P. Continues along the Enbridge ROW for 13.5 km NW then 1 km east along an existing outline

F; Provides good wildlife habitat, including potential denning sites. Local residents use the area for hunting. Cranberries. High with known resources within 2 km.

Acceptable- We feel that as long as the proponent is negotiating an MOU that these impacted sites can be effectively mitigated.

Water Crossings

A; Blackwater River

B; LUP Tab 4

C; 699

D; About 1.5 km from the mouth of Blackwater River, just upstream of the Enbridge ROW. A maximum of 7 boreholes will be drilled on the river valley slopes and banks (4 on the north side and 3 on the south side). 1 borehole will be drilled from an ice bridge across the channel of the river.

E; Access will be obtained through the winter road, existing cutlines and the Enbridge ROW. 1.25 km of new access might be required to reach the river.

F; Provides good wildlife habitat, including potential denning sites. Local residents use the area for hunting and fishing.

High with known heritage resources within 2 km.

Acceptable- if there is no new access as they use the old Enbridge line.

A; White Sands Creek

B; LUP Tab 16

C; 750

D; About 6.5 km from the mouth of White Sands Creek, adjacent to the Enbridge ROW. A maximum of 6 boreholes will be drilled on the river valley slopes and banks (3 on the north side and 3 on the south side).

E; Access will be 6.5 km from the winter road along the frozen surface of White Sands Creek. Some new access will be required on the north slope. The Enbridge ROW will provide access on the south slope.

F; Provides good wildlife habitat, including denning sites. Local residents use the area for hunting. Rutting and spawning areas. High with known heritage resources within 5 km.

Acceptable

A; Ochre River

B; LUP Tab 19

C; 759

D; About 5 km from the mouth of Ochre River, adjacent to the Enbridge ROW.

E; Access will be obtained through the winter road, existing cut lines, the Enbridge ROW and the frozen surface of the river.

F; Provides good wildlife habitat, including denning sites. Local residents use the area for hunting and fishing. High with known heritage resources within 2 km.

Acceptable

A; Smith Creek

B; LUP Tab 29

C; 797

D; About 2.5 km from the mouth of Smith Creek. A maximum of 4 boreholes will be drilled on the river valley slopes and banks (2 on the north side and 2 on the south side).

E; Access will be 800 m along an existing cutline from the highway and then another 150 m of new access.

F; Provides good wildlife habitat, including denning sites. Local residents use the area for hunting. High with known heritage resources within 10 km.

Not Acceptable- The reason being is because of the traditional uses for the hot springs and water falls

A; River Between Two Mountains

B; LUP Tab 34

C; 827

D; About 5 km from the mouth of River Between Two Mountains.

E; Access will be on existing cut lines and the Enbridge ROW.

F; Provides good wildlife habitat, including potential denning sites, fish habitat Grayling Pickerel. Local residents use the area for hunting. Moderate with known heritage resources within 5 km.

Acceptable – if no boreholes will be drilled in the channel of the river

A; Willowlake River

B; LUP Tab 37

C; 855

D; About 1 km from the mouth of Willowlake River.

E; Access will be on existing outline.

F; Provides good wildlife habitat, including potential denning sites. Local residents use the area for hunting and fishing. Old Fort Alexander

Acceptable – if no bore holes will be drilled in the channel of the river.

Recommendations;

All recoverable timber will be salvaged and decked next to the winter road, and or back hauled to Wrigley or other mutual sites.

That the proponent for the *EA03-009 Imperial Oil Geotechnical Program in the Dehcho Region* enter into a Memorandum of Understanding (MOU) in hopes that they can proceed safe and sound while at the same time address our concerns successfully.

The added infrastructure that the Pehdzeh K area has developed and in place as compared to the Sahtu, Gwich'en and Inuvialuit have made it more feasible for southern companies to out compete our business. So there for there should be a cost factor for work done in The Pehdzeh Ki First Nation Land Use Area.

That we the regulatory agencies, proponents and us work together to find out what all the thresholds are for the Pehdzeh Ki First Nation's people.

That the proponent identify (with the help of available sources) and prioritize a list of protected areas for the application.

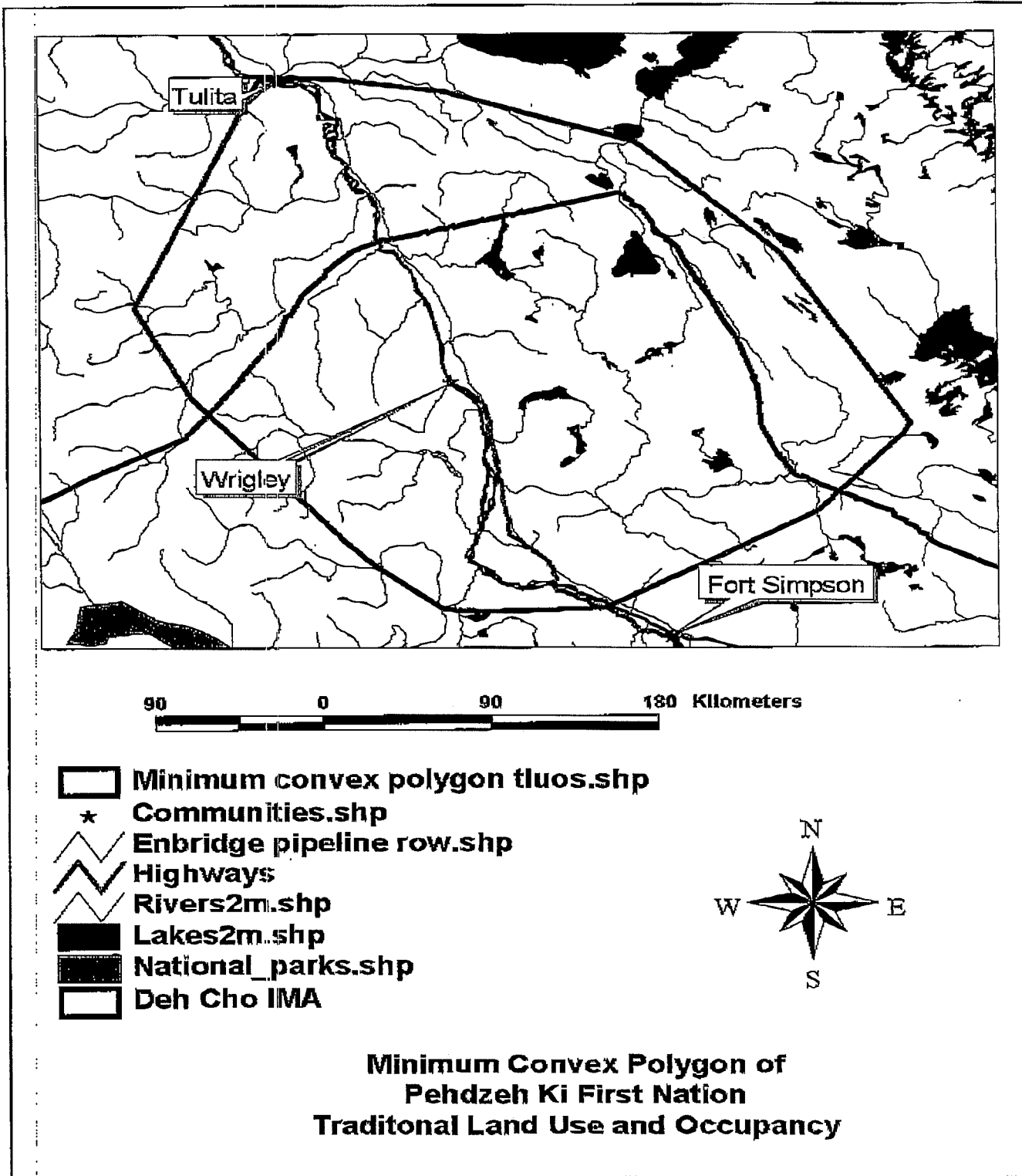
The Pehdzeh Ki First Nation people would like that the proponent to know that work for kilometre posts 785 to 800 is too close to our community and therefore should be move further east where the Enbridge pipeline runs as well as any further development.

That a PKFN environmental monitor is use at every impacted site and report to the people of PKFN.

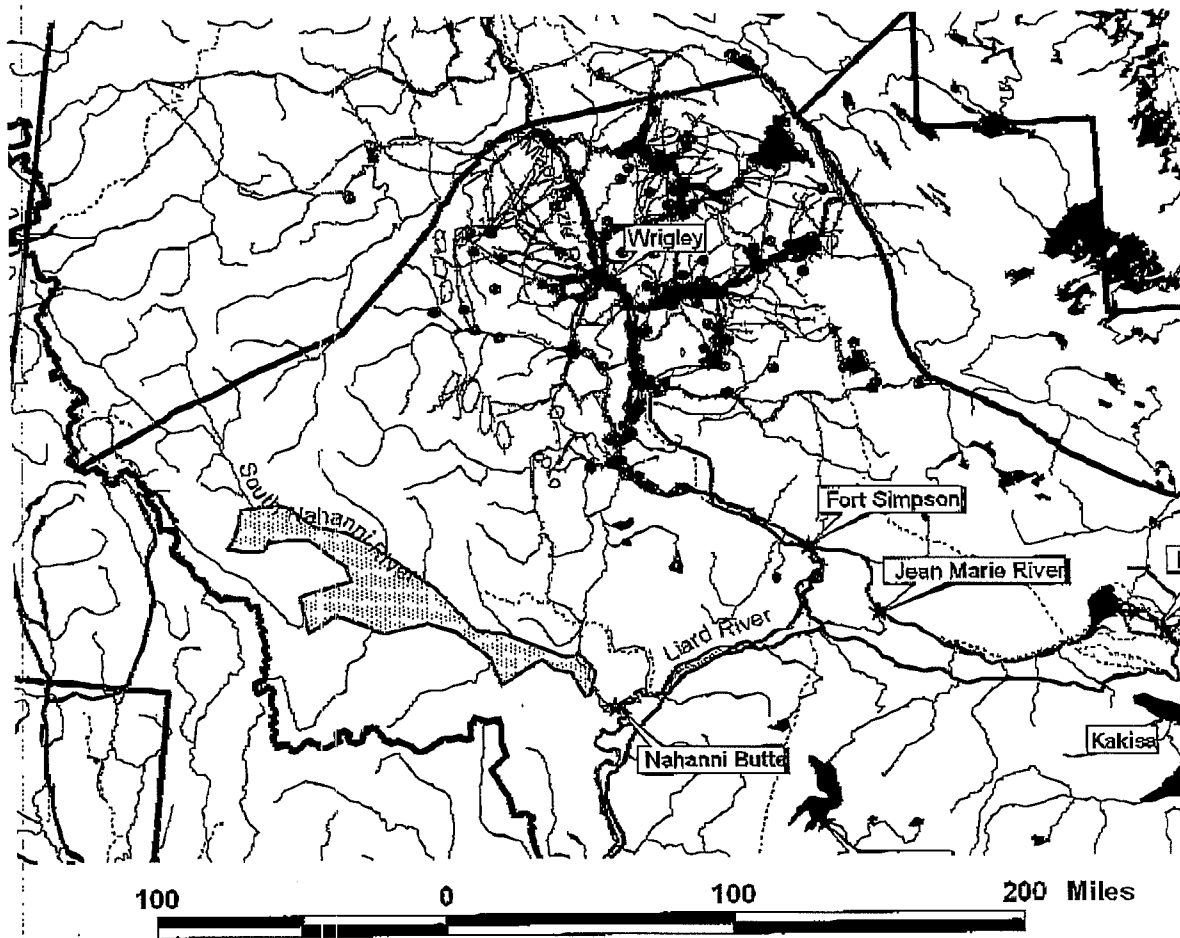
That there is a fifteen kilometre buffer zone around the Blackwater area were no intrusive work will be done.

We the Pehdzeh Ki First Nation People have review the environmental impacts for the *EA03-009 Imperial Oil Geotechnical Program in the Dehcho Region* and have made recommendations through out this presentation that we feel if combined with recommendations from the Dehghah Alliance Society's this application would be adequately mitigated.

Our worry for our livelihoods can not meet the expenses created by the impacts that this application will cause.



PKFN Raw (limited) Data



- PKFN Land Use
- PKFN Land Use
- Communities
- Deh Cho Study Area
- Deh Cho Interim Measures Agreement Boundary
- Wildlife Sanctuaries**
- Mackerzie Bison
- National Parks**
- Nahanni
- Wood Buffalo
- Seasonal Roads
- All-weather Roads
- Rivers 2M
- Lakes 2M

