



Our file: EA0506-007

February 23, 2007

Shirley Maaskant,  
Manager, Regulatory and Community Affairs  
Paramount Resources Ltd.  
4700 Bankers Hall West  
868-3<sup>rd</sup> Street SW  
Calgary, AB T2P-5C5

**By: fax and email**

Dear Ms. Maaskant,

**Re: MVEIRB response to Paramount February 2nd, 2007 letter**

On February 8<sup>th</sup>, 2007, the Mackenzie Valley Environmental Impact Review Board (Review Board) received your letter, dated February 2<sup>nd</sup>, 2007, regarding the significance determination and recommended mitigation measures identified in the Review Board's Report of Environmental Assessment for the SDL8 seismic exploration program EA0506-007.

I would first like to respond to Paramount's concerns presented in the last paragraph of the letter,

*"In light of the uncertainty surrounding caribou management and the absence of specific caribou management objectives in the Northwest Territories, Paramount requires a better understanding of the MVEIRB decision making process to comfortably contemplate the proposed seismic program, as well as future development in Northwest Territories."*

The Review Board stresses that its determination of significance and the associated recommended mitigation measures are only for the SDL8 program. It is not appropriate to extrapolate the conclusions of the SDL8 environmental assessment decision to all seismic exploration programs in the NWT. Each proposed development that comes before the Review Board is assessed on a case-by-case basis.

The Review Board is pleased to note that Environment Canada, Indian and Northern Affairs Canada and the Government of Northwest Territories – Environment and Natural Resources have recently signed a Letter of Agreement for the development of NWT-Wide Guidelines for Seismic Operations with a goal to have these guidelines developed by March 31, 2008. It is hoped that these guidelines will be able to provide companies such as Paramount, with greater certainty as to how seismic operations should be conducted in the NWT.

In response to your concerns regarding the Review Board's determination of significance and its recommended mitigation measures, I refer you again to the Report of Environmental Assessment, which summarizes the evidence that the Review Board considered in making its decisions.

I disagree with your assertion that the Review Board's determinations of significance, or its recommended mitigation measure were undertaken in "*the absence of sound evidence*". The Review Board had received considerable advice from knowledgeable individuals and organizations. This included advice from government departments with responsibility for, and expertise in boreal caribou, as well as documentation from credible sources such as the Boreal Caribou Committee.

I appreciate Paramount's efforts in researching and providing arguments regarding the determination of significance and the recommendation of mitigation measures. Certain references you have provided appear to be new information. However, most references you have cited were on the public record, either directly or indirectly, for this EA and therefore part of the evidence taken into consideration by the Board in its assessment of Paramount's proposed SDL-8 Seismic development.

Some of the references you provide in your letter have been cited as source material in documents on the public record; for example, CWS (2004); Dunford, J. (2003a); Dyer, S.J. *et al* (2002); James A.R.C. (2004); Neufeld L. (2005) and Oberg, P.R. (2001). Others such as BCC (2001); Dyer, S.J. *et al* (2001) and McLoughlin, P.D. *et al* (2003) were cited in the Government of the Northwest Territories' Information Request Response #7 received by the Review Board on May 15, 2006. Finally, a number of the references were added to the public record by the Review Board itself either at the commencement of the assessment or on August 9, 2006 when the Board identified a number of related documents that would be placed on the public record.

Unfortunately the time has passed for consideration of new information by the Board for this environmental assessment. Opportunities were available to Paramount and to the other parties to this EA to add to or question the evidence that had been placed on the public record while the record was still open. However, the public record for this EA is now closed and the Report of Environmental Assessment has been submitted to the Minister of Indian and Northern Affairs. The Review Board cannot further consider the matter at this time.

Should you have any further concerns about this matter, please do not hesitate to contact me at 766-7055 or by email at [vchristensen@mveirb.nt.ca](mailto:vchristensen@mveirb.nt.ca)

Sincerely,



Vern Christensen,  
Executive Director