

OCT 04 2006

Mr. Patrick Duxbury
Environmental Assessment Officer
Mackenzie Valley Environmental
Impact Review Board
PO BOX 938, 5102-50TH AVENUE
YELLOWKNIFE NT X1A 2N7

VIA FACSIMILE

Dear Mr. Duxbury:

PARAMOUNT RESOURCES LTD., EA0506-007 - SDL8
Comments on Request for Ruling

The Government of Northwest Territories (GNWT) appreciates the opportunity to respond to Paramount Resources Ltd. (Paramount) Request for Ruling to be heard on October 13, 2006, and submits the following comments.

Paramount has requested from the Mackenzie Valley Environmental Assessment Impact Review Board (MVEIRB) that:

1. Draft reference documents should not be considered by the MVEIRB in their deliberations.
2. The project area contemplated in this environmental assessment is exempt from the Deh Cho Land Use Plan – draft or otherwise.

With respect to the first matter, Paramount's reasoning that "draft documents have not been accepted by a regular review process and/or have not been adopted and proclaimed officially" should not be sufficient grounds for not considering their content. The draft documents in the reference list pertaining to caribou and MVEIRB's own draft seismic guidelines consolidate current thought and help to identify current best practices and expertise on the topic of minimizing development impacts to caribou and other wildlife species. By not considering this information, the Board and participants in the Environmental Assessment would miss an opportunity to use what may be best available sources of information whether "adopted" or "proclaimed" in any formal process or not.

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We are also concerned with the precedent such a ruling would set, and the implications for what is not an uncommon practice. For example, the GNWT notes that currently the Joint Review Panel for the Mackenzie Gas Project has at least one hundred documents listed in their public registry with "draft" in the title that are used as reference documents. We would expect that Boards and Panels apply the 'weight of evidence' criteria when considering such materials in their deliberations.

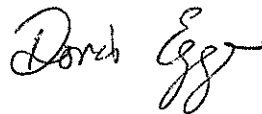
Should Paramount have a particular concern with a document they could be invited to address their concern with the content. If there are specific reasons for this request then a proper response could be made.

Regarding the second request, Paramount Resources suggests that the project area be exempt from the Dehcho Land Use Plan (DLUP) - draft or otherwise. It should be noted the DLUP is currently a draft that has been approved only by the Dehcho First Nation and has been submitted to the GNWT for its approval and Indian and Northern Affairs Canada for its consideration. While draft, the DLUP is not currently being implemented but it does contain valuable background information that the Board may wish to consider.

Given our above concerns, the GNWT submits that the MVEIRB should deny the Request for Ruling as submitted by Paramount Resources.

Should you have any questions regarding the above, please contact Mr. Joel Holder at 920-6106 or by e-mail at joel_holder@gov.nt.ca.

Sincerely,



Doris Eggers
Director
Policy, Legislation and Communications