

FAX COVER SHEET

DATE: January 12, 2006

CLIENT #: 216-00.4

TO: Mackenzie Valley Environmental Impact
Review Board
Attention: Martin Haefele

FAX: 1-867-766-7074

CC: Ka'a'Gee Tu First Nation
Attention: Chief Lloyd Chicot & Council and
Allan Landry

FAX: 1-867-825-2002

CC: Joe Acorn

VIA EMAIL

CC: Gowlings
Attention: Alan Hollingworth, Q.C.

FAX: 1-403-263-9193

CC: Paramount Resources Ltd.
Attention: Shirley Maaskant

FAX: 1-403-262-7994

CC: Deh Gah Got'ie Dene Council
Attention: Theresa Bonnetrouge

FAX: 1-867-699-3134

CC: Fort Providence Métis Council
Attention: Albert J. Lafferty

FAX: 1-867-699-4319

FROM: Louise Mandell, Q.C.

RE: Environmental Assessment EA0506-007:
Paramount SDL-8 2-D Geophysical Program

ORIGINAL BEING SENT BY MAIL: No

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MESSAGE

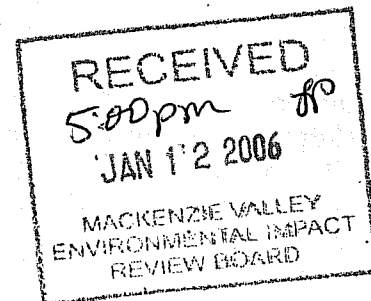
Please see attached correspondence.

Thank you.

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AS SOON AS POSSIBLE.**



FROM MANDRELL PINDER

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January 12, 2006

By Fax: (867) 766-7074

Mackenzie Valley Environmental Impact Review Board
Box 938 - 200 Scotia Centre
5102 - 50th Avenue
Yellowknife, NT X1A 2N7

Attention: Martin Haefele

Dear Sir:

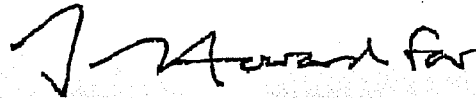
**Re: Environmental Assessment EA0506-007:
Paramount SDL-8 2-D Geophysical Program**

We have received the responses to our motion of December 16, and provide the following by way of reply.

With respect to the submissions of Paramount and INAC, we submit that they miss the point. The fundamental rationale for the requested suspension, is that the reconciliation of the Crown's authorization of Paramount's developments in the Cameron Hills with the Ka'a'Gee Tu's constitutionally protected aboriginal and treaty rights, has not been achieved. This Board has twice now determined that specific measures are required in relation to that reconciliation, and twice now the Minister of INAC has disregarded those recommendations. The current litigation squarely addresses the legality of that conduct, and we respectfully submit that the Review Board should not push ahead with yet another stage of development when such fundamental legal and constitutional issues remain outstanding. This position applies regardless of whether the current EA is within or without the cumulative effects assessment area previously considered in EA 05006-07.

With respect to the submissions of the other parties, we note that they do not oppose our motion. On behalf of the Ka'a'Gee Tu First Nation, we appreciate this opportunity to provide our further submissions.

Yours very truly,
MANDELL PINDER



Louise Mandell, Q.C.
Barrister and Solicitor

ccs: Clients
Gowlings: Alan Hollingworth, Q.C.
Paramount Resources Ltd.: Shirley Maaskant
DGGDC
FPMC

