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File No.: 4462

VIA EMAIL: chair@mvlwb.com

Original to follow by Mail

April 29, 2020

Mackenzie Valley Land and Water Board
4922 – 48th Street
7th Floor YK Centre Mall
PO Box 2130
Yellowknife, NT X1A 2P6

ATTENTION: Mavis Cli-Michaud, Chair

Dear Ms. Cli-Michaud:

Re: Paramount Resources Ltd., Forthcoming Engagement Plan and Applications, Ft. Liard, dated April 1, 2020

We represent the Acho Dene Koe First Nation (“ADKFN”) of Fort Liard, NT. On April 1, 2020, ADKFN received an Engagement Plan and notice from Paramount Resources regarding its intent to file new applications with the MVLWB for activities at Liard West and Liard East.

As we have previously advised the Board in our correspondence dated April 23, 2018, Paramount was required to file benefits plans for its Ft. Liard operations prior to project authorization under section 17(2) of the NWT *Oil and Gas Operations Act*, SNWT 2014, c 14. As you are also aware, the existence and contents of, and Paramount’s compliance with these benefits plans is currently before the Supreme Court of the Northwest Territories in Action no. S-1-CV-2018 000373. The parties are currently awaiting a decision from the Court.

It is our understanding that the MOU between the MVLWB and the Office of the Regulator of Oil and Gas Operations states that each party should “work together cooperatively in the exercise of their respective statutory duties and powers,” with the goal of facilitating “ease of participation by proponents and stakeholders.”

The *MVLWB Consultation and Engagement Policy* states that, “A proponent...is expected to respond to... concerns where it can do so and work with affected parties to jointly resolve...issues.” It also states that, “the Boards must ensure that the concerns of Aboriginal people and the general public are taken into account, and that their decisions

have regard for the protection of the social, cultural, and economic well-being of residents of the Mackenzie Valley.”

Since the Supreme Court has yet to rule on whether Paramount is in compliance with its authorizations from the Office of the Regulator of Oil and Gas Operations, it would be premature for the MVLWB to approve Paramount’s forthcoming Engagement Plan or to approve further Land Use Permits and Water Licences until such time as the Court has made its ruling. As well, the MVLWB should not make any determinations of Paramount’s compliance with currently issued Permits and Licences until such time as the Court has issued a ruling in action no. S-1-CV-2018 000373.

Should anything be of concern, please contact the undersigned.

Yours truly,

Rae and Company



L. Douglas Rae
LDR/ms

for:

cc. Acho Dene Koe First Nation Chief and Council