

From: webmaster@onlinereviewsystem.ca
To: [Erica Janes](#)
Subject: chotson@mvlwb.com | Paramount Pointed Mount Type A licence Proceeding- Board Response to Request for revised workplan
Date: Friday, January 31, 2025 2:56:31 PM
Attachments: [image002.png](#)
[Paramount Resources Ltd. - Pointed Mountain - Board Response to Workplan Request - Jan31_25 .pdf](#)

Please see the attached response from the Executive Director to Paramount

Chris Hotson

Regulatory Manager

Mackenzie Valley Land and Water Board

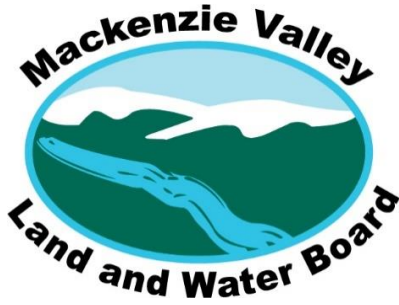
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January 31, 2025

File: MV2023L1-0010
MV2023A0028

Terence Hughes
Regulatory and Community Affairs Advisor
Paramount Resources Ltd.
2800, 421-7 Avenue SW
Calgary AB T2P 4K9

Sent by e-mail

Dear Terence Hughes,

Re: Pointed Mountain Gas Field Remediation Project – Water Licence and Land Use Permit – New Applications – Proposed Submission and Workplan – Not Approved

Thank you for your letter of January 27, 2025, in which you requested that the Board revise the Workplan for this file so that parties would have an opportunity to review Paramount Resources Ltd.'s (Paramount) Interim Closure and Reclamation Plan (ICRP) as part of the proceeding for the Pointed Mountain project.

Board staff have carefully considered the suggestion, including the proposed revisions to the Workplan, and have decided that we cannot grant this request.

The main issue for the Board is that Paramount's suggested timelines do not align with the legislated timelines for the issuance of water licences, as laid out in the *Waters Act*. Section 47(1) states that "...the board shall make a decision within a period of nine months after the day on which the application is made or on which notice of the Board's intention is published..." The current Work Plan (Version 5) forecasts a Board decision in August 2025, which should meet the nine-month timeline. Paramount's proposed Work Plan forecasts a Board decision being made in March 2026, which is well beyond the legislated timeline. Although section 52 of the *Waters Act* and section 72.24 of the MVRMA allows extensions of this time limit, we feel it would be challenging for the Board justify given that the Board's Standard Water Licence Conditions and Schedules allow for the submission, review and consideration of an ICRP after issuance of a water licence.

Paramount may still choose to submit an ICRP mid-proceeding and after the public record has closed; if this is the case, Board staff will post the submission to the public registry pages for Licence MV2023L1-0010 and Permit MV2023A0028, but no public review will occur, and the ICRP will not be presented to the Board for consideration. This will also allow for Paramount to engage with parties further on the draft ICRP, as the Board requires adequate engagement in its consideration of closure planning. It is also important to note that the submission requirements for a CRP will be outlined in the water licence, upon issuance. In this case, Paramount may be required to revise its ICRP to meet the requirements of the water licence.

Overall, we are confident that under the current Work Plan this Proceeding will result in Paramount receiving authorizations that are appropriate for the Project.

Sincerely,



Kathy Racher
Executive Director

Copied to: Paramount Resources Ltd.
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Nathen Richea – Assistant Deputy Minister, GNWT-ECC
Bill Pain, GNWT-ECC