



Mackenzie Valley Land and Water Board
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December 4, 2018

File: MV2018A0022 & MV2018L1-0005

Jessica Jumbo
Environmental Coordinator
Sambaa K'e First Nation
PO Box 10
Trout Lake, NT X0E 1Z0

Email: environment@sambaakefn.com

Dear Ms. Jumbo:

Late Review Comments submitted on Paramount Resources Ltd. Land Use Permit and Water Licence Applications

On November 27, 2018, late comments were posted by Sambaa K'e First Nation (SKFN) to the Mackenzie Valley Land and Water Board's (MVLWB/the Board) Online Review System (ORS) regarding Paramount Resource Ltd.'s (Paramount's) Land Use Permit MV2018A0022 and Water Licence MV2018L1-0005 Applications. Please note that the online review was started on October 29, 2018, with reviewer comments due on November 16, and proponent responses due on November 23.

The following is a summary of some of SKFN's comments and concerns, Paramount's responses, and follow-up clarification requested by Board staff. Please note that the Board has a legislated 42-day timeline in which to process land use permit applications, and that deadline in this instance is December 10, 2018.

SKFN Comments Regarding Engagement

SKFN commented that Paramount's pre-submission engagement was not adequate, as they were only contacted via telephone on one occasion in August and did not receive the message. Based upon the information received by the Board it is our understanding that the following occurred:

1. **July 4, 2018** - the Engagement Plan was sent by email to chief@sambaakefn.com and environment@sambaakefn.com. Paramount, in their response, provided an [email confirmation](#) that the messages were received. Paramount also indicated that this package contained contracting information which SKFN commented on during their review.
2. **July 11, 2018** - follow up to the Engagement Plan was via a phone call. No evidence was provided in support of this effort by Paramount other than stating it on the record, in their response, that this occurred.
3. **July 20, 2018** - the application notification package was sent to stakeholders to inform them that Paramount would be moving forward with application submissions to the Board. Included in the list of stakeholders for the SKFN are Chief Dolphus Jumbo and Jessica Jumbo. Paramount,

in their response, provided an [email confirmation](#) that the messages were received by the email addresses of chief@sambaakefn.com and environment@sambaakefn.com.

4. **August 13, 2018** - follow up phone call from Paramount to SKFN. The Engagement Plan submitted has a consultation log that indicates that a message was left.

Additionally, the Permit and Licence applications, all management plans, including the Engagement Plan, and draft conditions were distributed by email by Board staff on October 29, 2018 to Jessica Jumbo and Chief Dolphus Jumbo, with the comment period closing on November 16, 2018. During the designated comment period, no comments were received from SKFN on the applications, draft conditions, or engagement, nor was a request for an extension to the review period received. Board staff attempted to contact the SKFN environment office to seek clarification on the concerns raised by SKFN following receipt of the late comment; a voice message was left with the office staff, but we did not receive a response.

SKFN has indicated they would like more information on the project, and that they would like to meet with Paramount to discuss mitigations for the project.

In order to assist with the Board process, we are requesting that SKFN provide the following:

- i. **If the above noted proponent engagement record is not accurate, please correct it.**
- ii. **Please outline what additional information SKFN would like on the project that is not already presented as part of the online review (information found at http://lwbors.yk.com/LWB_IMS/ReviewComment.aspx?appid=12609, including review comments and responses by Paramount).**

Please provide the response by email by **5:00 pm MT on Thursday, December 6, 2018**. Please contact Board staff with any questions at (867) 766-7470 or via email at kleach@mvlwb.com.

Sincerely,



Shelagh Montgomery
Executive Director

Linked Information:

[Paramount July 4 and 20 engagement receipt confirmation](#)
[July 4, 2018 email sent to all stakeholders on the Engagement Plan](#)
[July 20, 2018 email sent to all stakeholders regarding applications](#)