

SAHTU LAND AND WATER BOARD

APPLICATION FOR RENEWAL OF WATER LICENSE

LICENSEE: Imperial Oil Resources N.W.T Limited

LICENCE NUMBER: Water Licence S03L1 – 001

DATE OF ISSUANCE: 30 August 2004

MOTION

OF IMPERIAL OIL RESOURCES N.W.T LIMITED TO

AND WHEREAS section 30(1)(b) of the *Mackenzie Valley Resources Management Act* provides that a board may make rules for preventing trade secrets and other confidential information from being disclosed or made public as a result of their being used as evidence before the board, including rules providing for hearings to be held in private;

AND WHEREAS section 68 of the Mackenzie Valley Land and Water Board *Rules of Procedure* provides that, unless a motion to protect the confidentiality of information is filed with and approved by the Board, all information will be placed on the public record;

AND WHEREAS Imperial submitted confidential information to the Board on May 29, 2014, and has been requested by the Board to submit further confidential information;

AND WHEREAS Imperial is willing to provide certain confidential information to the Board in order to enable it to make a proper determination of the end-of-life abandonment and reclamation liabilities in respect of those undertakings which fall within its jurisdiction;

AND WHEREAS Imperial wishes to ensure that all confidential information which it submits to the Board will be managed in a way which protects it from improper disclosure.

NOW THEREFORE by this MOTION:

1. Imperial requests that the Board apply its protocol for protecting confidential information to the specifically identified proprietary commercial and financial information which Imperial submits as evidence to the Board.
2. Imperial requests that its confidential information be disclosed only to those parties which have a genuine, direct and identifiable, interest in knowing the exact financial details of Imperial's abandonment and reclamation plan.
3. An undertaking from a party's legal counsel to preserve confidentiality will be sufficient to satisfy Imperial's concerns for the protection of its privacy.

ALL OF WHICH IS RESPECTFULLY SUBMITTED

Dated this 30TH day of May, 2014, in the City of Calgary, in the Province of Alberta.

Peter L Miller

Barrister and Solicitor

Imperial Oil Resources N.W.T. Limited