

**From:** [Andrew Wheeler](#)  
**To:** [Terence.Hughes@paramountres.com](mailto:Terence.Hughes@paramountres.com)  
**Cc:** [Andrea Cleland](#); [Erica Janes](#); [Heather Scott](#)  
**Subject:** FW: MV2020L1-0007 – Paramount Resources Ltd. – Updated Security  
**Date:** Wednesday, November 23, 2022 3:31:00 PM  
**Attachments:** [image004.png](#)  
[Conformity Notes.xlsx](#)

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Hi Terence,

The additional information received via ORS file upload on November 1, 2022 has been deemed incomplete. For additional information requirements for the Closure and Reclamation Plan, please see the attached conformity spreadsheet.

With respect to security, Paramount's request is not clear. The submission included a closure cost estimate which differs from the security requirements of the Licence and Permit, without context as to whether Paramount is seeking an adjustment. I advise Paramount to review the [Closure Cost Guidelines](#) for the LWBs' expectations for these requests. Further, Paramount does not acknowledge a request they made on February 12, 2021 to which LWB staff responded with an incomplete letter dated [February 22, 2021](#). This letter directed Paramount to engage with the GNWT and identified additional information requirements necessary to support their request; however, this submission does not address those requirements. Please note also that an adjustment to security requires an amendment to the Permit, while an adjustment to the security required by the Licence requires a change to the applicable schedule; however, it is not clear from Paramount's submission whether these as well have been requested. To deem the request to adjust security complete, the following information is required:

1. Clearly indicate whether Paramount is seeking an adjustment to security requirements. If yes, see additional requirements below.
2. Describe why Paramount is seeking an adjustment.
3. Address items 1-4, and any other applicable items, from the February 22, 2021 letter.
4. Provide an updated closure cost estimate. The estimate must be based on the version in which the Board made its decision at issuance, and must clearly identify the following:
  - a. any inputs that differ,
  - b. a detailed description of each adjusted line item,
  - c. rationale for the adjustment, and
  - d. supporting documentation.

Items 4a-c must be clearly identified within the spreadsheet, though, another supporting document can be provided if more room is necessary. The estimate can be access via this link: [MV2020A0010 MV2020L1-0007 - Paramount - Liard East - Renewal Applications - GNWT RECLAIM Estimate - Apr\\_19](#)

5. Submit a request to amend the Permit, a request to change the schedule of the Licence, and the associated submission requirements. Submission requirements are described in the [Guide to the Permitting Process](#) and the [Guide to the Water Licensing Process](#).

Andy

Andrew Wheeler  
Regulatory Specialist  
Mackenzie Valley Land and Water Board



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**From:** Andrew Wheeler  
**Sent:** Wednesday, September 21, 2022 2:47 PM  
**To:** Terence.Hughes@paramountres.com  
**Cc:** Andrea Cleland <acleland@mvlwb.com>; Erica Janes <ejanes@mvlwb.com>  
**Subject:** FW: MV2020L1-0007 – Paramount Resources Ltd. – Updated Security

Hi Terence,  
The Liard East CRP and security adjustment request are deemed incomplete as they do not meet conformity requirements. Please see the attached spreadsheet for detail.

Of note, the LWB staff managing Paramount's authorizations have been updated: Andrea Cleland is the lead for Liard South and Celibeta, while Erica Janes is lead for Pointed Mountain. Please include them in correspondence related to their respective files. Andrea and Erica are cc'ed on this email and additional contact information is [available on our website](#). I remain the main contact for Liard East and West.

Thanks,  
Andy

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**From:** Andrew Wheeler  
**Sent:** Wednesday, September 21, 2022 11:37 AM  
**To:** [Terence.Hughes@paramountres.com](mailto:Terence.Hughes@paramountres.com)  
**Cc:** Sean Joseph <[sjoseph@mvlwb.com](mailto:sjoseph@mvlwb.com)>; Chris Hotson <[chotson@mvlwb.com](mailto:chotson@mvlwb.com)>  
**Subject:** FW: MV2020L1-0007 – Paramount Resources Ltd. – Updated Security

Hi Terence,  
This email provides further information regarding Paramount's request to keep the Excel versions of the closure cost estimates off the public registry. To consider the request, Paramount is required to submit a Request for Ruling in accordance with [Rules 22, 23, and 59 of the LWBs' Rules of Procedure](#). Let me know if you have any questions.

Thanks,

Andrew Wheeler  
Regulatory Specialist  
Mackenzie Valley Land and Water Board  
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**From:** Andrew Wheeler

**Sent:** Monday, September 19, 2022 10:15 AM

**To:** [Terence.Hughes@paramountres.com](mailto:Terence.Hughes@paramountres.com)

**Cc:** Sean Joseph <[sjoseph@mvlwb.com](mailto:sjoseph@mvlwb.com)>; Chris Hotson <[chotson@mvlwb.com](mailto:chotson@mvlwb.com)>

**Subject:** RE: MV2020L1-0007 – Paramount Resources Ltd. – Updated Security

Hi Terence,

The regulatory process is public. Information requirements such as Excel formats of closure cost estimates increase affected parties' accessibility and their ability to participate in regulatory processes. Same for separating large documents into multiple smaller documents. This is a standard means of increasing accessibility for communities who often have limited internet speed and bandwidth.

Note that the format of the information does not change the evidence that has been submitted by Paramount.

Paramount's cooperation is anticipated and appreciated. Thanks,  
Andy

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**From:** Terence Hughes <[Terence.Hughes@paramountres.com](mailto:Terence.Hughes@paramountres.com)>

**Sent:** Monday, September 19, 2022 9:39 AM

**To:** Andrew Wheeler <[awheeler@mvlwb.com](mailto:awheeler@mvlwb.com)>

**Cc:** Sean Joseph <[sjoseph@mvlwb.com](mailto:sjoseph@mvlwb.com)>; Chris Hotson <[chotson@mvlwb.com](mailto:chotson@mvlwb.com)>

**Subject:** RE: MV2020L1-0007 – Paramount Resources Ltd. – Updated Security

Andrew,

Paramount Resources Ltd. ("Paramount") is not comfortable providing easily editable documents to the public registry. Paramount reluctantly provides unsecured documents (PDFs) for the public registry to assist the MVLWB and reviewers. Paramount in the past has provided feedback relating to board guidelines and processes noting concerns with document security (see email below as an example). Paramount notes the *LWB/GNWT/CIRNAC Guidelines for Closure and Reclamation Cost Estimates for Mines* you refer to state:

"These Guidelines can be used to inform closure cost estimates for projects which require a water

licence but are not mining, milling, or advanced mineral exploration projects (e.g., oil and gas projects<sup>7</sup>); the Boards' processes and expectations for closure cost estimates will typically be the same as those outlined in these Guidelines."

Can be used and typically provide space for our request in the opinion of Paramount Resources Ltd. of posting the security as a PDF, which would be consistent with all other documents that Paramount submits to the MVLWB. Why does the MVLWB want the document in Excel (other than allow others to edit the work of Paramount)?

The ESAs are part of the CRP so Paramount expects them to be posted. Your question again highlights Paramount's concern with breaking up documents for ease of review. A PDF of the security estimate is attached for ease of reference.

Terence

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**From:** Andrew Wheeler <[awheeler@mvlwb.com](mailto:awheeler@mvlwb.com)>  
**Sent:** Monday, September 19, 2022 8:43 AM  
**To:** Terence Hughes <[Terence.Hughes@paramountres.com](mailto:Terence.Hughes@paramountres.com)>  
**Cc:** Sean Joseph <[sjoseph@mvlwb.com](mailto:sjoseph@mvlwb.com)>; Chris Hotson <[chotson@mvlwb.com](mailto:chotson@mvlwb.com)>  
**Subject:** RE: MV2020L1-0007 – Paramount Resources Ltd. – Updated Security

Please provide rationale as to why Paramount has requested the Excel version of the closure cost estimate not be loaded to the public registry. Please note that it is a standard requirement for proponents to submit closure cost estimates in Excel format, and that they be posted to the registry. See the [Closure Cost Guidelines](#) for additional information.

Further to this, was a PDF version of the closure cost estimate provided? I cannot locate one within the submissions provided. If a PDF version has not been provided, please submit that as well. Ultimately, a copy of the closure cost estimate will be distributed as part of the public review for this submission (once deemed complete) to allow reviewers to understand Paramount's position and provide evidence.

Please also clarify whether Paramount is requesting that the ESAs be kept off the registry and why.

Andy

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**From:** Terence Hughes <[Terence.Hughes@paramountres.com](mailto:Terence.Hughes@paramountres.com)>  
**Sent:** Friday, September 16, 2022 2:01 PM  
**To:** Andrew Wheeler <[awheeler@mvlwb.com](mailto:awheeler@mvlwb.com)>  
**Cc:** Sean Joseph <[sjoseph@mvlwb.com](mailto:sjoseph@mvlwb.com)>; Chris Hotson <[chotson@mvlwb.com](mailto:chotson@mvlwb.com)>  
**Subject:** RE: MV2020L1-0007 – Paramount Resources Ltd. – Updated Security

Andrew,

Paramount Resources Ltd. has attached the requested excel version, this is not for the public registry

and is for the use of Board staff internally. Paramount Resources Ltd. does not grant the Mackenzie Valley Land and Water Board permission to share this document with other parties. Paramount Resources Ltd. is requesting an adjustment to the security requirements. Our position regarding security has been well documented through direct correspondence and on the public registry. To help Board staff with their review separated documents are attached, again this is not for the public registry and not for the Mackenzie Valley Land and Water Board to share with other parties.

Paramount Resources Ltd. has serious concerns with portions of project documents being separated and not being viewed within their proper context and/or with accompanying details.

The broken up document will come in several emails. B-41 information is attached to this email.

Respectfully,

Terence Hughes  
Regulatory and Community Affairs Advisor  
Paramount Resources Ltd.  
Phone: 403-206-3859

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**From:** Andrew Wheeler <[awheeler@mvlwb.com](mailto:awheeler@mvlwb.com)>  
**Sent:** Tuesday, September 13, 2022 4:09 PM  
**To:** Terence Hughes <[Terence.Hughes@paramountres.com](mailto:Terence.Hughes@paramountres.com)>  
**Cc:** Sean Joseph <[sjoseph@mvlwb.com](mailto:sjoseph@mvlwb.com)>  
**Subject:** RE: MV2020L1-0007 – Paramount Resources Ltd. – Updated Security

Hi Terence,

The document is being reviewed for conformity. A few notes at this time:

- Please provide Excel versions of the closure cost estimates as they will be needed for completeness.
- Clarify whether Paramount is seeking an adjustment to security requirements.
- Please submit a version reduced in size, or one that has the appendices separated because the document is cumbersome to use.

Thanks,  
Andy

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**From:** Sean Joseph <[sjoseph@mvlwb.com](mailto:sjoseph@mvlwb.com)>  
**Sent:** Tuesday, August 30, 2022 3:11 PM  
**To:** Terence Hughes <[Terence.Hughes@paramountres.com](mailto:Terence.Hughes@paramountres.com)>; Andrew Wheeler <[awheeler@mvlwb.com](mailto:awheeler@mvlwb.com)>  
**Subject:** Re: MV2020L1-0007 – Paramount Resources Ltd. – Updated Security

Hi Terence,

I will get back to you on this as I need to discuss your concerns with Andy, who is away from the office right now.

Regards,  
Sean

Sean Joseph, Regulatory Specialist

Mackenzie Valley Land and Water Board

7th Floor, 4922 48th St. | PO Box 2130 | Yellowknife, NT | Canada | X1A 2P6

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**From:** Terence Hughes <[Terence.Hughes@paramountres.com](mailto:Terence.Hughes@paramountres.com)>

**Sent:** Tuesday, August 30, 2022 2:49 PM

**To:** Andrew Wheeler <[awheeler@mvlwb.com](mailto:awheeler@mvlwb.com)>; Sean Joseph <[sjoseph@mvlwb.com](mailto:sjoseph@mvlwb.com)>

**Subject:** FW: MV2020L1-0007 – Paramount Resources Ltd. – Updated Security

Sean and Andrew,

Paramount Resources Ltd. ("Paramount") submitted a Closure and Reclamation Plan that included an updated Security for Liard East in July. What is the status of that document with the MVWLB?

Thanks,

Terence Hughes  
Regulatory and Community Affairs Advisor  
Paramount Resources Ltd.  
Phone: 403-206-3859

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**From:** Amanda Gauthier <[agauthier@mvlwb.com](mailto:agauthier@mvlwb.com)>  
**Sent:** Tuesday, August 30, 2022 2:07 PM  
**To:** Distribution List <[mvr+b+7A426074-48D4-EB11-A7AD-0050F22DCB89@simensma.onmicrosoft.com](mailto:mvr+b+7A426074-48D4-EB11-A7AD-0050F22DCB89@simensma.onmicrosoft.com)>; Terence Hughes <[Terence.Hughes@paramountres.com](mailto:Terence.Hughes@paramountres.com)>  
**Cc:** Andrew Wheeler <[awheeler@mvlwb.com](mailto:awheeler@mvlwb.com)>  
**Subject:** MV2020L1-0007 – Paramount Resources Ltd. – Updated Security

Good day,

Please see the attached document. if you have any questions, please contact [Andrew Wheeler](mailto:Andrew.Wheeler@mvlwb.com) at (867) 766-7467.

Regards,  
Amanda Gauthier  
Executive Coordinator  
Mackenzie Valley Land and Water Board  
7th Floor, 4922 48th St, PO Box 2130 | Yellowknife, NT | X1A 2P6  
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