

May 21, 2024

Mackenzie Valley Land & Water Board
7th Floor, 4922 48th Street
P.O. Box 2130
Yellowknife, NT
X1A 2P6

Attention: Erica Janes

RE: Draft Work Plan for Land Use Permit MV2023A0028 and Water Licence MV2023L1-0010 for Pointed Mountain NWT

Dear Ms. Janes,

Paramount Resources Ltd. (Paramount) has reviewed the Draft Work Plan proposed by the Mackenzie Valley Land and Water Board (“MVLWB”) for the Pointed Mountain Remediation Project Applications (MV2023L1-0010 and MV2023A0028). Paramount provides the comments and table below as a response to the Draft Work Plan.

Paramount has a long history of applying for and receiving regulatory approvals from the MVLWB. It has been the experience of Paramount that timelines are weighted towards reviewers and the MVLWB. Given the MVLWB day count starts and stops numerous times during the Draft Work Plan, working in additional, appropriate time for proponent responses from the outset seems reasonable. Further, it will reduce or eliminate the requirement for Paramount to submit a request(s) for additional time during the process.

The table below outlines a revised Work Plan timeline. Paramount provides reasoning along with the revised dates it has proposed. Paramount expects large volumes of comments and requests during the various stages of the process and needs to be afforded a fair and reasonable amount of time to respond.

Task	Responsible Party	Date Due (Date Completed)	Paramount Suggested Date and Rationale
Application Package Submitted	Applicant	October 3, 2023	N/A
Additional Information Submitted	Applicant	February 29, 2024 April 29, 2024	N/A

Task	Responsible Party	Date Due (Date Completed)	Paramount Suggested Date and Rationale
Application Package Distributed for Review with Draft Work Plan	Board staff	May 8, 2024	N/A
Deadline for Comments on Draft Work Plan	All Parties	May 15, 2024	May 21, 2024 based on approved Paramount request
Deadline for Comments on Application Package and for Notices of Compensation Claims	Reviewers	June 19, 2024	N/A
Deadline for Applicant's Responses to Comments	Applicant	July 3, 2024	July 12, 2024. Reviewers have nearly 6 weeks to create inquiries/comments, additional time will be needed to respond due to anticipated volume (based on Project and proponent experience). Original timeframe does not account for statutory holiday.
Technical Session	All Parties (location TBD)	July 16-17 2024	August 7-8, 2024. Allow reasonable time for reviewers and the MVLWB to review Paramount responses. Paramount suggests a virtual session. Paramount staff unavailable in late July.
Distribute Technical Session or Workshop Information Requests	Board Staff	July 19, 2024	August 12, 2024. Accounts for August long weekend holiday
Deadline for Responses to Information Requests	All Parties	July 26, 2024	September 7, 2024. It has been the experience of Paramount in the previous technical session it took place in a large number of detailed information requests result. Allow for sufficient time for response and account that not all staff are available during late August.
Preliminary Screening Determination	Board	July, 2024	September 2024
Pre-Hearing Conference	All Parties (location TBD)	July 31, 2024	Late September 2024. Paramount suggests a virtual conference
Deadline for Interventions and for Compensation Claims	Interveners and Compensation Claimants	August 30, 2024	Late October 2024
Deadline for Applicant's Response to Interventions	Applicant	September 11, 2024	November 30, 2024 It has been the experience of Paramount that a large number of detailed interventions should be expected

Task	Responsible Party	Date Due (Date Completed)	Paramount Suggested Date and Rationale
Deadline for Interveners' Public Hearing Presentations*	Interveners	September 25, 2024	December 13, 2024
Deadline for Applicant's Public Hearing Presentation*	Applicant	October 2, 2024	December 20, 2024
Public Hearing*	All Parties (location TBD)	October 9-10, 2024	January 15 and 16 2025. Paramount suggests a virtual hearing
Distribute Public Hearing Undertakings	Board Staff	October 15, 2024	January 23, 2025
Deadline for Public Hearing Undertakings	All Parties	October 29, 2024	February 13, 2025. Allow for appropriate time for undertakings to be completed. Paramount's previous experience is undertakings tend to be numerous and detailed.
Draft Licence and Permit Distributed for Review*	Board Staff	November 25, 2024	March 13, 2025
Deadline for Comments on Draft Licence and Permit*	Reviewers	December 19, 2024	April 3, 2025
Deadline for Applicant's Comments on Draft Licence and Permit*	Applicant	January 7, 2025	April 24, 2025 or May 1, 2025. Unclear if Paramount is expected to respond to reviewer comments, if so the later day of May 1 is more appropriate
Deadline for Closing Arguments*	Reviewers	January 14, 2025	May 8, 2025
Deadline for Applicant's Closing Arguments*	Applicant	January 21, 2025	May 15, 2025
Board Meeting	Board	March, 2025	July 2025
Board Recommendation to the Minister	Board	March, 2025	July 2025
Minister's Decision	Minister	Up to 90 days	Up to 90 days

*No new evidence can be submitted in these steps of the proceeding without a Request for Ruling (see Rules 37 and 38 in the LWB [Rules of Procedure](#)).

If the MVLWB has any questions or requires any clarity on the points raised above, please contact the undersigned via phone at 403-206-3859 or via email at terence.hughes@paramountres.com .

Yours truly,

PARAMOUNT RESOURCES LTD.

A handwritten signature in blue ink that reads "Terence Hughes". The signature is written in a cursive style with a prominent flourish at the end.

Terence Hughes
Regulatory and Community Affairs Advisor