

From: [Chuck Hubert](#)
To: [Malorey Nirlungayuk](#)
Subject: FW: Imperial Oil Line 490- Developers Assessment Report
Date: November 8, 2024 10:10:32 AM

From: Mark Cliffe-Phillips <mcliffephillips@reviewboard.ca>
Sent: November 8, 2024 9:45 AM
To: Chuck Hubert <chubert@reviewboard.ca>
Subject: Fw: Imperial Oil Line 490- Developers Assessment Report

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I am blessed to live, play, learn and work in Chief Drygeese Territory of the Yellowknives Dene First Nation, within Treaty 8 Akaitcho Territory, M̄qwhí Gogha Dè N̄jtłèè, and home of the North Slave Métis Alliance.

message sent from my mobile

From: Aaron Sanders <aaronsanders20201@gmail.com>
Sent: Wednesday, October 23, 2024 7:04:32 PM
To: Mark Cliffe-Phillips <mcliffephillips@reviewboard.ca>
Subject: Imperial Oil Line 490- Developers Assessment Report

Mr Mark Phillips

Developers Assessment Report

- According to Cabin Radio, the Mackenzie Valley Environmental Impact review board made a decision to exempt Imperial Oil from submitting a 'Developer's Assessment Report (DAR) for its Line 490 project , thereby reducing the EA process to 6 months. [Six-month timeline proposed for Imperial Line 490 assessment](#)
- In the spirit of procedural fairness,.the MVEIRB should treat all companies/proponents the same, rather than give preferential treatment to companies like Imperial. MVEIRB should not "cherry pick" which company submits a DAR, and which one doesn't.
- This sets a terrible precedent and greatly undermines the First Nations that have raised concern with the project.
- Imperial should have to submit a Developer's Assessment Report (DAR) like all the other proponents.

Number of Environmental Assessments

- MVEIRB made the decision to combine the two environmental assessments (EA's) for Imperial into one.
- MVEIRB should respect the authority of Sahtu Secretariat Inc (SSI) to decide the number of EA's.
- If SSI has decided it is two separate assessments, then it must be two, and the MVEIRB should not try to undermine their authority.

Aaron Sanders.

From: [Chuck Hubert](#)
To: [Malorey Nirlungayuk](#)
Subject: FW: Imperial Oil- Environmental Assesment
Date: November 8, 2024 10:11:00 AM

From: Mark Cliffe-Phillips <mcliffephillips@reviewboard.ca>
Sent: November 8, 2024 9:43 AM
To: Chuck Hubert <chubert@reviewboard.ca>
Subject: Fw: Imperial Oil- Environmental Assesment

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message sent from my mobile

From: Aaron Sanders <aaronsanders20201@gmail.com>
Sent: Wednesday, October 23, 2024 11:02:12 PM
To: Mark Cliffe-Phillips <mcliffephillips@reviewboard.ca>; valerie.gordon@slwb.com <valerie.gordon@slwb.com>; jenna.grandjambe@slwb.com <jenna.grandjambe@slwb.com>
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Subject: Imperial Oil- Environmental Assesment

Attn: Mr. Mark Cliff Phillips

The Sahtu Secretariat Inc has recently referred Imperial Oil's entire Norman wells operation, as well as its Line 490 project to environmental assessment.

I would like to bring to your attention section 25.3.5 (c) of the Sahtu Dene & Metis Comprehensive Land Claim Agreement, that states:

- *"No license or approval that would have the effect of permitting a development proposal to proceed shall be issued in respect of the proposal until the processes referred to in (a) and (b), and 25.3.7 or 25.3.8 have been completed."*

Both the MVEIRB and CER are in direct contravention of section 25.3.5 (c) of the Sahtu Dene & Metis land claim agreement by allowing Imperial Oil to continue operations during an ongoing environmental Assessment.

Imperial Oil Resources must therefore cease all operations immediately, until the environmental assessment is complete. The "Operations authorizations" cannot override the Sahtu Land Claim agreement.

Also the MVEIRB and CER do not have authority to combine the two environmental assessments into one. This should be up to the referring entity (the Sahtu Secretariat Inc).

Aaron Sanders

Reference

[Sahtu Dene and Metis Comprehensive Land Claim Agreement](#)