

May 6, 2025

JoAnne Deneron, Chair
Mackenzie Valley Environmental Impact Review Board
Box 938, #200 Scotia Centre 5102-50th Ave Yellowknife, NT X1A 2N7

**Re: EA2424-01, Line 490 Replacement Project Environmental Assessment
Imperial Oil Resources N.W.T. Ltd – Request for Adjournment**

I write, on behalf of the K'ahsho Got'ine Committee (the "Committee")¹ in response to Imperial Oil Resources N.W.T. Ltd's ("Imperial") request for adjournment of the Line 490 Replacement Project Environmental Assessment (the "Line 490 Environmental Assessment").

The Committee supports an adjournment of the Line 490 Environmental Assessment, on the condition that the record for intervenors remains open and the deadline for interventions is extended until after the Line 490 Environmental Assessment resumes.

The Committee supports an adjournment because, as indicated by Imperial, an adjournment would allow the parties to address broader operational impacts in the environmental assessment of the overall Norman Wells Operations (EA2425-02, the "Overall Operations Environmental Assessment"), prior to addressing the specific impacts of the Line 490 Replacement Project. An adjournment would also allow the Review Board to establish more reasonable timelines for the Line 490 Environmental Assessment hearing process for intervenors to engage in both environmental assessments in a meaningful and informed manner.


However, if the Review Board grants an adjournment of the Line 490 Environmental Assessment, the Committee seeks a further extension of the deadline for intervention until after the Line 490 Environmental Assessment resumes. The Committee seeks a further extension to ensure procedural fairness. Imperial and Intervenors must be given an equal opportunity to review and consider the evidence and decisions at the Overall Operations Environmental Assessment before the record on the Line 490 Environmental Assessment is closed for intervenors. Furthermore, it would be procedurally unfair if Imperial has the benefit of several months to review and prepare a response to interventions while intervenors had only a few weeks. Finally, Imperial's recent application for an adjournment has taken time, energy and resources away from the Committee's preparation of its intervention, leaving the Committee rushed in its preparation of an intervention, despite the already extended timeline.

¹ The Committee consists of the Fort Good Hope Dene Community Council, the Yamoga Lands Corporation, the Fort Good Hope Metis Nation Local #54 Land Corporation, the Fort Good Hope Renewable Resources Council and the K'ahsho Development Foundation. Each member of the Committee plays a key role in representing the K'ahsho Got'ine of Fort Good Hope and protecting K'ahsho Got'ine Rights.



We also remind the Review Board that, if the Line 490 Environmental Assessment is adjourned to prioritize the Overall Operations Environmental Assessment, the schedule and timelines for the Overall Environmental Assessment must be procedurally fair and must allow for informed and meaningful engagement.

Sincerely,

A handwritten signature in black ink, appearing to read 'CSM', followed by a long horizontal line extending to the right.

Ceilidh Stubbs
Legal Counsel for the K'ahsho Got'ine Committee