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VIA E-MAIL (hwiebe@dehcholands.org)

Heidi Wiebe  
Executive Director  
Dehcho Land Use Planning Committee  
General Delivery  
Fort Providence NT  
X0E 0L0

Ms. Wiebe,

**Re: Comments on the November 2005 Draft of the Proposed  
Dehcho Land Use Plan**

Imperial Oil Resources Ventures Limited (Imperial) has reviewed the November 2005 Draft Dehcho Land Use Plan and Background Report and is pleased to provide the following comments in response to your letter dated November 8, 2005.

Imperial recognizes and appreciates the consideration by the Dehcho Land Use Planning Committee to our previous suggestions. We note a number of instances in the November 2005 draft where you have incorporated our previous suggestions and addressed our concerns. We trust these comments will be received in the same light.

As the operator of the proposed Mackenzie Valley Pipeline (MVP) our comments address aspects of the draft plan that pertain to the construction and operation of the MVP in the Dehcho. I have included some general comments in this letter and provided more detailed comments in Table 1 attached to this letter. In addition, a map indicating our proposed developments for the MVP will be forwarded to you separately.

Imperial is a member of the Canadian Association of Petroleum Producers (CAPP) and participated in an oil and gas industry meeting on the November 2005 draft, held with the Dehcho Land Use Planning Committee in CAPP's office on December 16, 2005. Imperial contributed to the development of a letter outlining industry concerns regarding the November 2005 draft which will be forwarded by CAPP to the Dehcho Land Use Planning Committee. Imperial supports the recommendations included in the CAPP submission.

Imperial understands that the Dehcho First Nations, the Pehdzeh Ki First Nation, and Indian and Northern Affairs Canada have recently negotiated a corridor for the Mackenzie Valley pipeline and associated infrastructure in the traditional use area of the Pehdzeh Ki First Nation. This corridor extends north from Fort Simpson, through Wrigley to the boundary with the Sahtu Settlement Area. It traverses the western edges of the

proposed Pehdzeh Ki Deh candidate protected area (Zone 1) and the Wrigley special management zone (Zone 29). It also crosses the northern portion of the proposed Fort Simpson special management zone (Zone 23). The November 2005 draft indicates that, once the corridor negotiations are included in the Land Use Plan, the Special Infrastructure Corridor (Zone 30) will be extended through zones 1 and 29. Imperial supports the results of these negotiations, and requests that this extension and revision to Zone 30 be incorporated into the next draft of the Dehcho land use plan.

Imperial has determined that certain infrastructure developments, in particular a borrow site and access road associated with the Mackenzie Valley pipeline will be located in the proposed JMR Five Lakes (Zone 2) conservation zone. We recognize that your previous considerations of our requests have resulted in the proposal of a pipeline corridor through Zone 2. We request that the boundary to Zone 2 be further modified to provide for the proposed borrow site and connecting access road.

For consistency with other conservation zones potentially affected by the MVP, Imperial requests that the conformity requirement (CR #12) for the Mackenzie Valley Pipeline be added to the land use zone description for Zone 2. This description currently appears in Chapter 5 of the Background Report. Other related modifications are also recommended, including the lists of special management and conservation zones that are subject to CR #12.

Imperial now notes that the definition of the Mackenzie Valley Pipeline in the November 2005 draft differs from the one we had provided and was included in the June 2005 draft land use plan. The June 2005 definition provided a comprehensive list of the pipeline facilities, pipeline appurtenances and infrastructure developments that might be required to construct and operate the Mackenzie Valley pipeline within the Dehcho territory. That definition was flexible enough to accommodate refinements to the pipeline design within the defined pipeline corridor that might occur. Imperial requests that the next draft of the Dehcho land use plan revert to the June 2005 definition of the Mackenzie Valley pipeline, as it provides a better and more accurate depiction of MVP development activities.

Thank you for your consideration of these comments. If you have any concerns or questions, please contact J.R. Hawkins, by telephone at 403-237-2806 or via e-mail at [jim.r.hawkins@exxonmobil.com](mailto:jim.r.hawkins@exxonmobil.com).

Sincerely,

*Original signed by Randy Ottenbreit*

R.J. Ottenbreit

Attach

<b>TABLE 1 – RECOMMENDED CHANGES to November 2005 Draft Dehcho Land Use Plan</b>	
<b>Location in draft plan</b>	<b>Existing Wording with Recommendations Highlighted</b>
Plain Language Summary, p. 4, Revised Draft Plan, p. 11	This zone overlays, or floats, over the underlying zones. The intent is to add an additional permitted use (the Mackenzie Valley pipeline and associated infrastructure) and set of conditions for pipeline development within a restricted portion of each of those zones.
Plain Language Summary, p. 6-7 Revised Draft Plan, p. iv	<b>Mackenzie Valley Pipeline</b> Subject to regulatory approval, the Mackenzie Valley Pipeline and associated infrastructure or a similar pipeline will be allowed in the special infrastructure corridor (Zone 30). The pipeline corridor crosses many Conservation Zones so the Developer should reduce impacts and disturbance within these areas. The Developer should consult with the Committee to determine if special steps are needed to protect important values in the zones it crosses.
Revised Draft Plan, p. iii Background Report, p. iii, 85	<b>Conservation Zones</b> are designated in areas having significant ecological and cultural values. Conservation Zones are meant to provide flexible protection to lands of important cultural or ecological value. All developments except tourism prohibited in Conservation Zones. Two of the zones prohibit tourism as well.. There are 17 Conservation Zones covering 40.7% of the Plan Area. The Special Infrastructure Corridor provides a passage through four Conservation Zones.
Revised Draft Plan, p. iv, 7 Background Report, p. iv, 85	The <b>Special Infrastructure Corridor</b> (Zone 30) delineates a corridor for the Mackenzie Valley Pipeline and associated infrastructure based on the routing of the proponent and negotiated corridors through current withdrawals. This corridor overlaps the other zone types rather than cutting a portion out of them. The current routing crosses Zones 1, 3, 4, 5, 19, 21, 22, 23, and 29. A pipeline and infrastructure corridor has recently been negotiated north of Fort Simpson to the Sahtu Settlement Area boundary, which includes a passage through Zone 1 (Pehdzeh Ki Deh). This zone covers 0.4% of the Plan Area. The final routing of the corridor north of Fort Simpson will be reflected in the Plan as an extension to the Special Infrastructure Corridor.
Revised Draft Plan, p. xiii-xiv, Background Report, p. xix June 2005 Draft Plan, p. xix	<b>Mackenzie Valley Pipeline:</b> As defined in Section 1.1.1.2 of the October 2004 “Application for Approval of the Mackenzie Valley Pipeline, Volume 1: Pipeline Project Overview” submitted to the National Energy Board. This includes the possible expansion to 1.9 Bcf/d described in this section insofar as all additional components remain within the defined pipeline corridor. The pipeline includes ancillary infrastructure and activities including but not limited to compressor stations, heater stations, meter stations, block valves, pig receivers, gathering systems, processing facilities, well sites, pump stations, production facilities, remote maintenance base sites, access roads, camps, barge landings, airstrips, staging areas, borrow sites, water crossings, road/pipeline crossings, land leases, quarrying, water use, timber storage and any other construction only workspace required, and any other infrastructure or activity essential to the construction or operation of the Mackenzie Valley pipeline within the Dehcho territory.

<b>TABLE 1 – RECOMMENDED CHANGES to November 2005 Draft Dehcho Land Use Plan</b>	
<b>Location in draft plan</b> Revised Draft Plan, p. 22, 61	<p><b>Existing Wording with Recommendations Highlighted</b></p> <p><b>CR #12: Mackenzie Valley Pipeline:</b> Subject to regulatory approval and any conditions imposed on them by the appropriate Regulatory Authorities and Agencies, development of the Mackenzie Valley Pipeline and associated infrastructure, or an alternative pipeline with similar specifications, will be permitted within the Special Infrastructure Corridor, including the recently negotiated corridor north of Fort Simpson to the boundary with Sahtu Settlement Area (Zone 30). The Plan recognizes the need for access and infrastructure outside of this corridor. The pipeline corridor, additional access, gravel resources, camps and minor infrastructure will be managed in accordance with regulatory approvals and any conditions imposed on them by the appropriate Regulatory Authorities and Agencies. The terms for Access, Granular Resources and Minor Infrastructure in the approved Plan should be considered by the Regulatory Authorities and agencies in the regulatory approvals granted and the conditions imposed on them. Regulatory Authorities should direct larger infrastructure requirements to be located in General Use Zones and Special Management Zones in order of preference and where practical. Pipeline and associated infrastructure will be considered a permitted use in Conservation Zones providing it meets the following conditions:</p> <ul style="list-style-type: none"> <li>• There is no reasonably feasible alternative to the proposed location of infrastructure in the Conservation Zone;</li> <li>• The proposed infrastructure avoids the most sensitive ecological and cultural areas and reduces disturbances to Dehcho First nation(s) traditional land use and occupancy activities in the area;</li> <li>• The proposed infrastructure reduces the area affected, the intensity of disturbance, and uses established practices to reduce environmental impacts; and</li> <li>• The Developer can demonstrate that meaningful consultation has been held with affected First Nations on the construction, operation, reclamation and abandonment of the infrastructure.</li> </ul> <p>All future expansions or tie-ins and related infrastructure, will be subject to the applicable conditions in each of the underlying zones. Any requests to address future expansion of the pipeline and related infrastructure, or to extend feeder pipelines across any Conservation Zone, will be addressed by exception or amendment to the approved Plan or during Plan revision.</p>
<b>Revised Draft Plan, p. 22, 69</b>	<p><b>R #14:</b> The Mackenzie Valley Pipeline and associated infrastructure is expected to cross Zones 1, 3, 4, 5, 19, 21, 22, 23 and 29 and lie within Zone 30 (the Special Infrastructure Corridor). Infrastructure associated with the Mackenzie Valley Pipeline will also be required in Zone 2.</p>

<b>TABLE 1 – RECOMMENDED CHANGES to November 2005 Draft Dehcho Land Use Plan</b>	
<b>Location in draft plan</b>	<b>Existing Wording with Recommendations Highlighted</b>
Revised Draft Plan, p. 30, 65	<p>The Developer of the Mackenzie Valley Pipeline, or an alternative pipeline with similar specifications, should recognize the values and intent of these underlying zones and harmonize its activities with the intent of those zones.</p> <p><b>CR # 25: Cumulative Effects Management:</b> A pipeline constructed and operated in Zone 30, as extended north of Simpson to the Sahtu Settlement Area boundary, will also be exempt from this term.</p>
Background Report, p. 112	<p><b>Zone 1: Pehdzeh Ki Deh:</b> The Mackenzie Valley Pipeline as currently proposed will run the length of this zone from north to south just inside the western boundary. DFN, the Pehdzeh Ki First Nation, and the Indian and Northern Affairs Canada recently negotiated an infrastructure corridor through this area. As a result, Zone 30 will be extended to recognize this corridor.</p>
Background Report, p. 113	<p><b>Zone 2: JMR 5 Lakes</b></p> <p>Resource Potential</p> <p>Infrastructure associated with the Mackenzie Valley Pipeline will be required in this zone.</p> <p>Specific Terms</p> <p><b>CR #12: Mackenzie Valley Pipeline</b></p>
Background Report, p. 141	<p>The proposed Mackenzie Valley Pipeline runs northwest to southeast through the length of the northern portion of this zone. DFN, the Pehdzeh Ki First Nation, and the Indian and Northern Affairs Canada recently negotiated an infrastructure corridor through this area. As a result, Zone 30 will be extended to recognize this corridor.</p>
Background Report, p. 150	<p>The Mackenzie Valley pipeline as currently proposed will run the length of this zone from north to south just inside the western boundary. DFN, the Pehdzeh Ki First Nation, and the Indian and Northern Affairs Canada recently negotiated an infrastructure corridor through this area. As a result, Zone 30 will be extended to recognize this corridor.</p>

**TABLE 1 – RECOMMENDED CHANGES to November 2005 Draft Dehcho Land Use Plan**

<b>Location in draft plan</b>	<b>Existing Wording with Recommendations Highlighted</b>
Background Report, p. 152	<p>A Special Infrastructure Corridor (SIC) was established to address the proposed Mackenzie Valley Pipeline and associated infrastructure. The proposed routing crosses Zones 1, 3, 4, 5, 19, 21, 22, 23 and 29, all of which have different objectives. This SIC delineates a corridor within which the Mackenzie Valley Pipeline can occur, subject to regulatory approval and any conditions imposed on them by the appropriate Regulatory Authorities and Agencies, and the Mackenzie Valley Term described in the Plan (CR #12). This zone overlays or floats over the underlying zones instead of cutting through them. The intent is to add an additional permitted use (the Mackenzie Valley pipeline and associated infrastructure) and set of conditions for pipeline development within a restricted portion of each of those zones. The Mackenzie Valley Pipeline is encouraged to recognize the values and objectives of the zones within the corridor and align its activities with the surrounding intent wherever possible.</p> <p>The current zone reflects a combination of existing land withdrawals south of Fort Simpson and an infrastructure corridor that was recently negotiated by the DFN, the Pehdzeh Ki First Nation, and the Indian and Northern Affairs Canada. Zone 30 has been amended to reflect this corridor, which extends north of Fort Simpson to the boundary with the Sahtu Settlement Area. The corridor south of Fort Simpson varies from 2-5 km, whereas the corridor north of Fort Simpson is generally less than 2 km.</p>