



October 29, 2013

John Ondrack, Chair  
Environmental Impact Screening Committee  
Box 2120  
Inuvik, Northwest Territories  
OXE OTO

**Re. Imperial Oil Resources Ventures Limited - Beaufort Sea Exploration Joint Venture Drilling Program Project Description (file: 09-13-01)**

Further to the Council's receipt and review of Imperial Oil Resources Venture Project Description for the Beaufort Sea Joint Exploration Joint Venture Drilling Program (hereafter referred to as "the proposed Project" and "the PD"), and pursuant to sections 11(13)(b), 12(22), 13(9) and 13(10) of the Inuvialuit Final Agreement (IFA), the Council recommends referral of the Proposed Project to the Environmental Impact Review Board for assessment and review.

The PD recognizes that in some circumstances (non-routine events) certain significant adverse impacts could result from the Proposed Project. With regard to these and a number of other matters relating to routine and non-routine activities as defined in the PD (section 14), further assessment of the Proposed Project would be helpful to confirm the significance judgments of the Proponent as described in the PD with regard to the character and significance of potential impacts that may result. The consideration of additional information that may or may not support these judgments would be helpful and should be considered.

We would note that the proponent in its program planning (PD, p. 4-2; Table 4-1) has anticipated the possibility of a referral by the Environmental Impact Screening Committee (EISC) and made accommodation for such a decision by the EISC in its planning schedule.

The Council's interest in the Proposed Project follows from its mandate as established in the IFA and the area of the Yukon North Slope potentially affected by the Proposed Project. To be clear, the IFA (s. 12(1)) defines the Yukon North Slope as the lands between the Alaska and Northwest Territories borders with the Yukon **and** (emphasis added) the Beaufort Sea and including adjacent nearshore and offshore waters and islands. Activities in the offshore as they affect the conservation of wildlife, habitat and Inuvialuit use of the Yukon North Slope are of central interest to the Council.

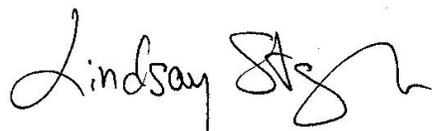
The Project Description refers to the Arctic Offshore Drilling Review conducted by the National Energy Board (NEB). The Council would suggest that some of the matters considered by the NEB in that review have relevance and bear further discussion in a project-specific context as in the case of the environmental screening and review of the Proposed Project. Deep water drilling and associated conditions in the Beaufort Sea are deserving of special attention. Drilling activities, spill fate modeling, monitoring and management, and mitigation, contingency planning and risk assessment are complex areas with evolving approaches, methodologies and technologies.

As well, the IFA provides for the Environmental Impact Review to determine a worst case scenario and an estimate of the potential liability of the developer to address matters of wildlife compensation (as established pursuant to IFA, s.13).

A full assessment and review conducted by the EIRB would provide for assessment of the Proposed Project in the aforementioned and other areas as they affect the biophysical environment of the Yukon North Slope and Inuvialuit use of that environment.

Thank you for your consideration.

Sincerely,

A handwritten signature in black ink that reads "Lindsay Staples". The signature is written in a cursive, flowing style.

Lindsay Staples  
Chair

cc: Dan Lindsey, Director  
Fish and Wildlife Branch, Government of Yukon

Dianne Wilson, Field Unit Superintendent  
Western Arctic, Parks Canada

Eric Shroff, Director  
Yukon Parks

Frank Pokiak, Chair  
Inuvialuit Game Council

Larry Carpenter, Chair  
Wildlife Management Advisory Council (NWT)

Billy Storr, President  
Aklavik Hunters and Trappers Committee