



INUVIALUIT GAME COUNCIL

April 30, 2014

Jon Pierce
Chair
Environmental Impact Review Board
Box 2120
Inuvik, NT X0E 0T0

Re: IGC comments on EIRB Draft Terms of Reference

Dear Mr. Pierce,

The Inuvialuit Game Council (IGC) has reviewed the Draft Terms of Reference for the Environmental Impact Review of the Beaufort Sea Exploration Joint Venture Drilling Program ("the ToR") and offers the following comments.

Overall the ToR are extensive and cover many of the areas of interest and concern for the IGC. Of particular interest are topics surrounding oil spill prevention and response, as well as protection of natural resources in the case accidental releases of hydrocarbons into the environment. Understanding the potential impacts of such an event will be critical, as will understanding the potential impacts on harvesting by Inuvialuit.

The ToR, in the *Preparedness and Response* section, requests for a "description of any capping and containment equipment and personnel that would be deployed..." in the event of a hydrocarbon release. The IGC would like an addition to this point for details on where such capping equipment would be located during drilling activities and the time required to mobilize and deploy such equipment onto a well. For example, will a capping stack be located on site (e.g. on a support vessel), or at a nearby location such as Tuktoyaktuk, or at a remote location (e.g. Alaska, Singapore)? The location of a capping stack will be vital to understanding the total amount of time required from the moment mobilization is initiated to the placement on a well and closing off the flow of hydrocarbons, and subsequently killing the well, in a blowout scenario. This in turn would give a greater understanding of the potential impacts from such a scenario, as well as what the appropriate operating season should be in order to allow time for such a deployment, if needed.

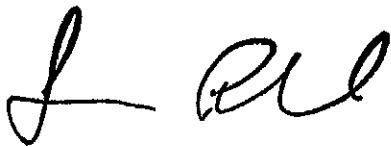
In the 'description of oil and chemical spill countermeasures' there should be information on how storage of liquid chemicals would be handled, particularly if they are to be stored in a location that could be subject to cold weather. What measures would be in place to ensure that any liquid chemicals stored for spill countermeasures would not freeze and thus not be available for immediate use if necessary.

The IGC agrees that a critical part of the review of this project will lie in the "[d]escription of how the NEB's SSRW policy expectations would be met." Given the well(s) are expected to take multiple seasons to drill, it is impractical to expect that it will be possible to drill a relief well in the same season. The SSRW equivalency issue will be at the heart of this entire process. While it is the National Energy Board that ultimately makes the determination on an equivalency, this issue will directly relate to several other aspects of the EIRB's environmental assessment of the project, including estimates of liability for the developer based on the Worst Case Scenario.

As mentioned in several places in the ToR, it would be beneficial for the proponent to clearly explain the methodologies and data used to reach its conclusions on assessments of environmental effects. Without sufficient information on how conclusions were reached it will difficult for other participants in the review - and for the EIRB itself - to make a determination whether the proponent's conclusions are satisfactory or not.

Thank you for the opportunity to provide our comments on the Draft ToR.

Sincerely,

A handwritten signature in black ink, appearing to read 'F. Pokiak', written in a cursive style.

Frank Pokiak
Chair

cc:
All HTC's