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Paul Dixon, Executive Director
Sahtú Land and Water Board
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Ken Hansen, Manager - Frontier Exploration
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Calgary, Alberta T2P 3G7

Delivered via email

April-24-14

RE: Request for removal of select materials from Public Registry – Husky applications S14S-003 and S14L-003: Slater River Exploratory Horizontal Program Application

Dear Mr Dixon and Mr. Hansen:

The Zehdzo Got'ine Gots'ë Nákedí (Sahtú Renewable Resources Board) has found serious errors in Figure C: “Land Resources- Caribou Habitat,” a map referring to tǒdzı (woodland caribou) winter habitat that is included as part of Appendix 1C of Husky’s S14A-003 and S14L1-002 application.

The map is misleading to interested parties reviewing the application and thus may have implications for their comments regarding the impacts of the proposed development on woodland caribou populations (both mountain and boreal). Boreal woodland caribou are listed as threatened under the NWT and Federal Species At Risk Act. As the main instrument of wildlife management in the Sahtú Region, we hereby formally request that this map be removed immediately from the Public Registry.

A similar map was included as part of the applications for Land Use Permit S13A-002 and Water License S13L1-005, and in our comment the Board noted a discrepancy. No response was received from Husky on this item at that time. We have since done further research to understand the source of the error, and have developed a Briefing Note that provides details and context. In short, Figure C is incorrectly labeled and does not represent woodland caribou winter habitat, but rather important calving and early to midsummer areas of the Redstone herd of mountain woodland caribou.

Thank you for your consideration of this request. Please don’t hesitate to contact me if you have any questions.

Sincerely,

Deborah Simmons
Executive Director

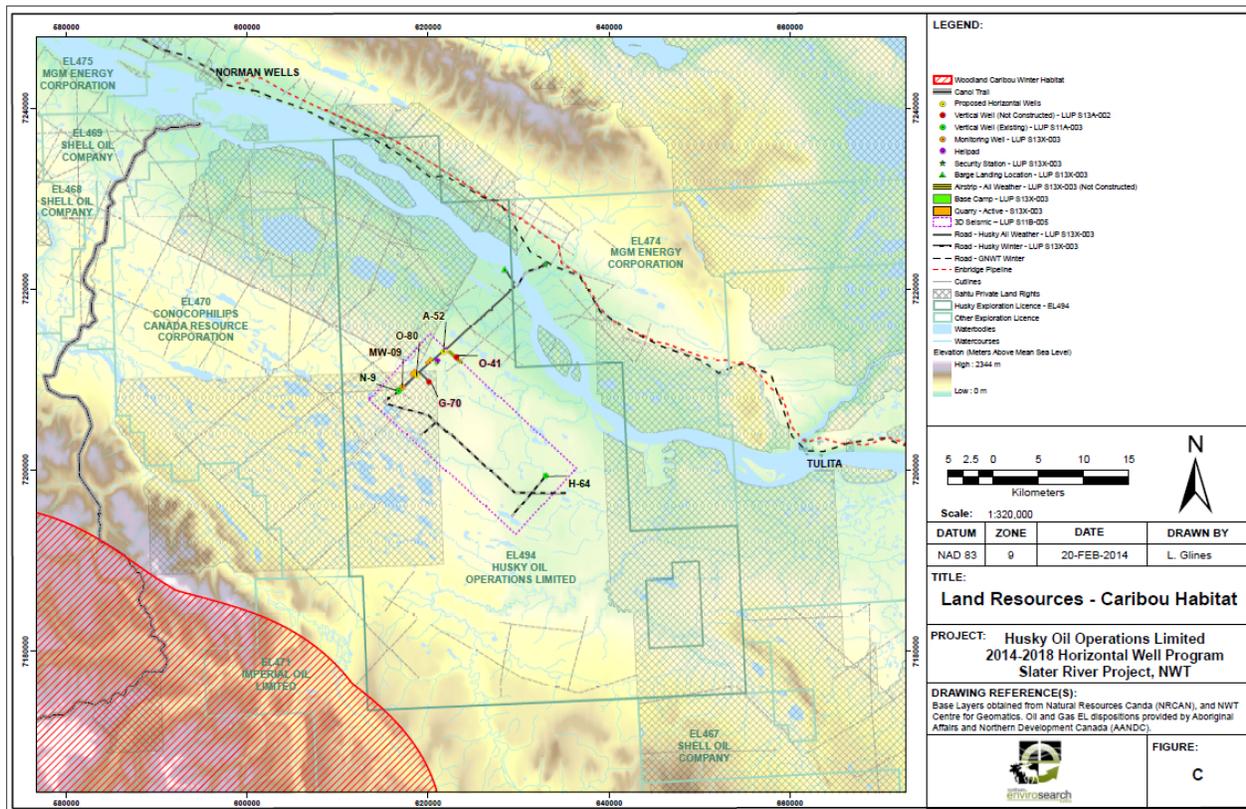
Briefing Note



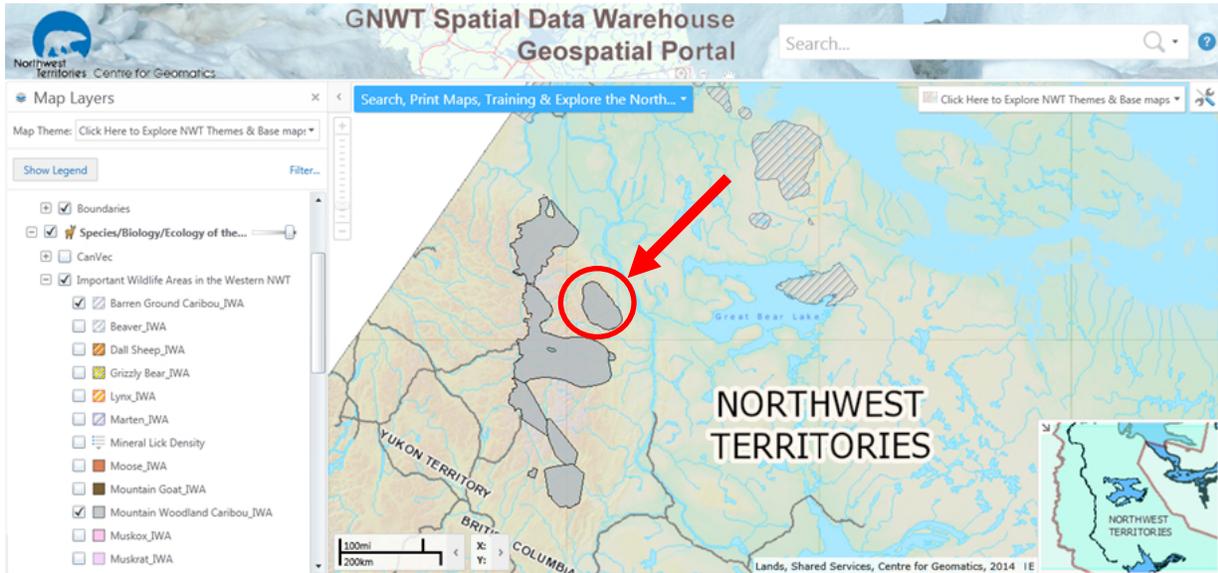
17 April 2014

RE: Errors in Figure C: “Land Resources- Caribou Habitat,” Appendix 1-C - Husky applications S14S-003 and S14L-003

The figure below, Figure C in Appendix 1-C includes a red polygon that is labeled as “woodland caribou winter habitat”. The source of the red polygon labeled “woodland caribou winter habitat” is a GIS data file from the NWT Centre for Geomatics. The layer includes important caribou areas and is publically available through the Centre for Geomatics GNWT Spatial Data Warehouse Geospatial Portal.

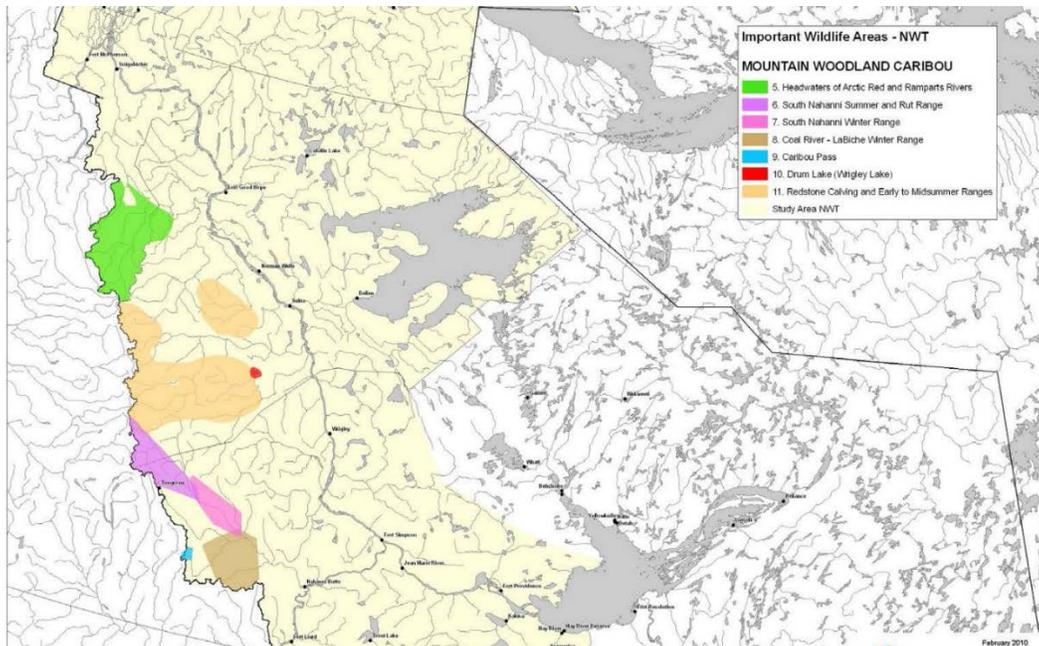


The red polygon in the Husky report comes directly from the grey shaded areas available in the Geospatial Portal below. These polygons represent Mountain Woodland Caribou important areas.



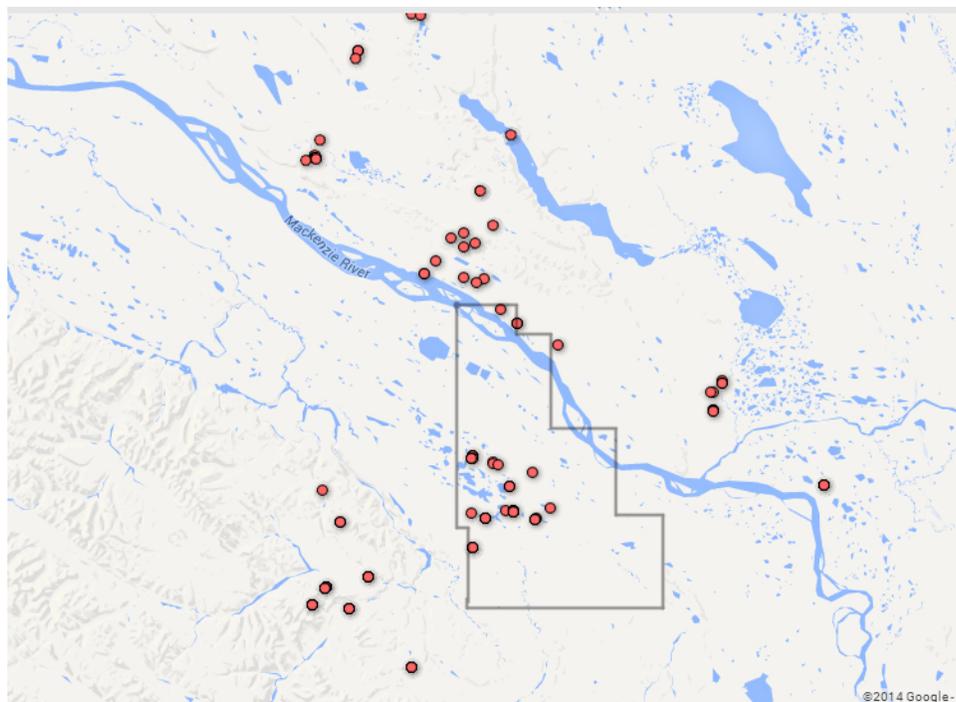
More specifically, the gray polygons supplied by the Centre for Geomatics are from a report titled: *Important wildlife areas in the western Northwest Territories* by Joanna M. Wilson and Claudia A. Haas. Environment and Natural Resources, Government of the Northwest Territories. 2012. Manuscript Report No. 221.

The specific polygon (in the Husky map) is from Figure 4 of the report and is labeled as: Redstone Calving and Early to Midsummer Ranges Study Area NWT.



The Husky map is misleading because it suggest that “woodland caribou winter range” only occurs outside of the Husky block in the mountains. In fact, the polygon was mislabeled. The polygon instead shows **mountain woodland caribou** and represents important calving and early to midsummer ranges of the Redstone herd. These important area polygons **are not population distribution maps**, but rather maps representing “Important Wildlife Areas, to the best knowledge of the people involved, based on discussions during 2006 to 2009 with communities, co-management boards, departmental staff and others as well as review of available reports” (page 2). The maps should not be used to represent species, population, or ecotype boundaries.

Further, data are available that provide evidence for the presence of woodland caribou (likely of the boreal woodland caribou ecotype) within Husky’s block year round. Scat samples have been collected from Feb-March and in August (2013-2014) by EnviroSearch, Explor, ENR, and PhD student Jean Polfus. The map below shows caribou scat samples collected between 2013-2014 in and near the Husky block.



ENR has also conducted TEK boreal caribou habitat surveys (2000-2001), Explor has flown surveys that indicate woodland caribou presence in the Husky block, and Husky has documented caribou presence in the block through sightings, tracks, and remote cameras (see page 5-49 of Appendix 1, Environmental Effects Report). Finally, boreal woodland and mountain woodland caribou range boundaries are also available from the Centre for Geomatics GNWT Spatial Data Warehouse Geospatial Portal. This spatial data should not be left out of maps that indicate woodland caribou seasonal habitat.