

Vuntut Gwitchin Government: Conformity Review of Chance Oil and Gas Ltd.'s September 2020 YESAB Project Proposal: Eagle Plains Well Maintenance and Winter Activities

ID	Reference	Context	Rationale	Request
1.	Section 1.2 Location Page 3	The Project Proposal states "The project area is within the Traditional Territories of the Vuntut Gwitchin (VG)."	The correct term is "Vuntut Gwitchin First Nation," abbreviated to "VGFN."	Please revise the statement as follows: "The project area is within the Traditional Territories of the Vuntut Gwitchin First Nation (VGFN)." Please ensure that the correct abbreviation is applied throughout the Project Proposal.
2.	Section 1.5 Regulatory Requirements Page 5	Section 1.5 does not identify Well Operation Approvals required for the Project. Well Operation Approvals are issued by the Chief Operations Officer of the Oil and Gas Resources Branch, Yukon Government, pursuant to the Oil and Gas Act and Oil and Gas Drilling and Production Regulations (OGDPR).	A full listing of regulatory requirements is needed to understand the regulatory context of the Project.	Please provide information about Well Operation Approvals required for the Project, including information about COGL's current and planned submissions and proposals to the Oil and Gas Resources Branch with respect to the project. Please describe how the proposed Project aligns with the OGDPR.
3.	Section 2.1.2.1 Legacy Wells Page 15	The Project Proposal states "Once pressure, SCVF, and gas migration testing is complete, the service rig, support	COGL's July 21 2020 response to VGG's Information requirement #8, provided to COGL on July 10 2020, indicates	Please revise the statement in Section 2.1.2.1 to indicate the purpose of the moving the

		equipment, and wireline will be moved to the well site.”	that the service rig, support equipment and wireline will be moved to the wellsite to replace wellbore fluid.	service rig, support equipment and wireline to the wellsite.
4.	Section 2.1.2.3 Wellbore Integrity Analysis Page 16	The Project Proposal states that the wellbore integrity analysis will include “Bit and scraper run on tubing to ensure the wellbore is still full drift”.	This statement includes technical jargon. The Project Proposal must be presented in a manner that is understandable to a lay audience.	Please replace technical terms in the statement in Section 2.2.1.3 with plain language descriptions or provide a definition.
5.	Section 2.1.6 Well Conversion to Deep Injection Wells Page 20	The Project Proposal states that wells A-25 and E-78 will be converted to deep injection wells and that wellbore fluids removed from A-25 and E-78 (and possibly from H-28 and/or B-73) will be injected into the wells.	Section 2.1.6 does not describe future use of the wells A-25 and E-78 following injection of wellbore fluids 78 (and possibly from H-28 and/or B-73).	Please describe anticipated future use of wells A-25 and E-78 following injection of wellbore fluids 78 (and possibly from H-28 and/or B-73), including the anticipated duration of such use.
6.	Section 2.1.8 Well Site and Winter Road Reclamation p. 23	The Project Proposal states that “Reclamation activities will aim to return the site as closely as possible to its pre-Project condition, with the exception of well sites around wells A-25 and E-78, where the insulated fluid tanks and structure	<p>“Pre-project condition” is not defined and it is unclear whether “pre-project condition” refers to current conditions or conditions prior to historic well-development.</p> <p>Reclamation end land use objectives need to be clearly defined in order to assess the</p>	<p>a) Please define the “pre-project condition” and describe how the success of reclamation measures will be determined and how reclamation progress will be reported to VGG.</p> <p>b) Please identify the infrastructure that will remain</p>

enclosing the pumps and piping will remain at the sites.”

effectiveness of proposed reclamation measures. This should include objectives related to traditional land use.

at wells M-59, M-08, and J-19 if the wells are suspended.

In addition, the section notes that wells M-59, M-08, and J-19 may not be returned to “pre-project condition” (if EFT proves there is sufficient resources and wells are suspended). However, the section does not identify what infrastructure will remain at these wellsites.

7. Section 2.3
COVID-19
Safety
Considerations,
p. 25

The Project Proposal outlines the proponent’s COVID-19 safety considerations.

The Proponent’s COVID-19 plans are not sufficiently detailed and do not include information about how they will be enforced.

Please revise Section 2.3 to include the following information:

- Policies regarding mask wearing in indoor public places (including hotels)
- Policies regarding mask wearing when in close contact with other workers
- Measures to monitor and verify self-isolation for workers from outside of BC, NWT, and Nunavut or anyone testing positive for COVID-19.

				<ul style="list-style-type: none"> • Policies for testing all employees for COVID 19, particularly if an employee tests positive.
8.	Section 2.4 Fuel Storage Page 26	The Project Proposal states “A draft Spill Contingency Plan has been developed and is available in Appendix B. The plan will outline the procedures to be followed in the event of a petroleum product spill during all phases of the Project. It will also include safety procedures for personnel and proper equipment usage during or after a spill.”	The draft Spill Contingency Plan does not identify how spill events will be communicated or how VGG will be involved in spill contingency planning or response.	Please describe how spill events will be communicated to VGG and how VGG will be involved in spill contingency planning or response.
9.	Section 3.2.1 Vuntut Gwitchin (Summary of Consultation) Page 30	The Project Proposal identifies information requested by VGG on July 10, 2020.	VGG’s list of information requirements also included access management and reclamation plans.	Please add “access management” and “reclamation plans” to the list in Section 3.2.1.
10.	Section 3.2.1 Vuntut Gwitchin (Summary of	The Project Proposal states “feedback from VG impacted the development of mitigation measures and contributed to identifying additional information that was not	Information regarding VGG’s influence on the Project Proposal is required to determine the adequacy of engagement.	Please identify the mitigation measures that were influenced by feedback from VGG.

<p>Consultation) Page 30</p>	<p>provided in the earlier draft of the Project Description and the Project Proposal as a whole (e.g., additional information on the regulatory context and the rationale for maintaining the wells in suspended well status versus abandonment).”</p>		
<p>11. Section 4.1 Assessment Scope Page 36</p>	<p>The Project Proposal states “The VCs selected for this assessment were based on Project relevance and importance to First Nations [...]”</p>	<p>Engagement with Indigenous communities is an essential step in VC selection. The Project Proposal contains insufficient information about the nature and extent of such engagement and how it influenced the selection of VCs for the assessment.</p>	<p>Please provide information about how the “relevance and importance” of VCs to Indigenous communities was determined.</p>
<p>12. Section 4.2 Establishing Assessment Boundaries Table 4.1 Spatial and Temporary Boundary Definition Page 36</p>	<p>The Project Proposal states “The spatial boundaries of the Project area are outlined in Figure 2-1.” Figure 2-1 identifies a “Project Area.”</p>	<p>Spatial boundaries are defined to capture potential effects on VCs and should consider the spatial characteristics of VCs as well as potential direct and indirect interactions with project components and activities.</p>	<p>Please describe how the “Project Area” was designed to capture potential effects on VCs.</p>

<p>13. Section 4.2 Establishing Assessment Boundaries Table 4.1 Spatial and Temporary Boundary Definition Page 36</p>	<p>The Project Proposal states “the temporal scope of this assessment is 2 years.”</p>	<p>A temporal scope of 2 years may be too short to detect long-term effects on VCs and the operating life of deep injection wells. Temporal boundaries should consider characteristics of VCs in addition to the temporal limits of the project.</p>	<p>Please provide a rationale for the temporal scope of the Project in reference to the anticipated duration of potential effects on VCs, including effects from ongoing activities at the injection wells.</p>
<p>14. Section 4.3 Establishing Baseline Conditions Page 37</p>	<p>The Project Proposal states “The first step in performing an environmental and socio-economic effects assessment is to understand the existing environmental and socio-economic conditions currently present within the assessment area.”</p>	<p>The temporal period used to establish baseline conditions has a direct bearing on the effects assessment. Current conditions may reflect an already-impacted environment, particularly for the Project given that the area includes existing wells. An appropriate baseline period would be inclusive of pre-impact conditions and change over time. This provides a more fulsome understanding of project effects as well as an indication of the vulnerability and resiliency of VCs to project impacts.</p>	<p>Please identify the temporal boundary used to determine environmental and socio-economic baseline conditions.</p>

<p>15. Section 4.5 Characterization of Effects and Determination of Significance Page 37</p>	<p>The Project Proposal provides a general definition and general ratings for residual effects characterization criteria. However, the effects assessment in Section 6 does not provide definitions for criteria ratings for residual effects. In addition, criteria ratings are not systematically provided for residual effects assessments for Vegetation or Heritage Resources.</p>	<p>VC-specific definitions for residual effects criteria ratings are required in order to understand how the Project Proposal has determined the significance of adverse effects.</p>	<p>Please provide definitions for criteria ratings for each VC.</p>
<p>16. Section 5 Valued Component Scoping Page 30</p>	<p>The Project Proposal states that valued components “were selected based on the results of environmental and archaeological field studies, literature reviews, consultation with First Nations, and professional expertise.”</p>	<p>The Project Proposal does not indicate how engagement with Indigenous groups informed the selection of valued components.</p>	<p>Please describe how engagement with Indigenous groups informed the selection of valued components, by Indigenous group.</p>
<p>17. Section 5 Valued Component Scoping Page 39</p>	<p>The Project Proposal states that “Social and cultural [valued components] were based primarily on current and historic human use, such as</p>	<p>It is unclear how information about current and historic human use has been collected by the Proponent or how such information informed the</p>	<p>Please provide sources for information about current and historic human use collected by the Proponent and how it influenced the selection of</p>

		hunting, recreation, and heritage values”.	selection of social and cultural valued components.	social and cultural valued components.
18.	Section 5.0 Valued Component Scoping Page 39	The Project Proposal states “technical feasibility was considered for selection of VC subcomponents. These criteria relate to technical factors that could affect the effects assessment, such as the availability of baseline data or the level of understanding of how the project could affect the VC subcomponent.”	The availability of baseline data or the level of understanding of how a project could affect a valued component should not preclude selection of a valued component. The selection of valued components should guide baseline data collection needs and inform methods to address uncertainty.	Please identify any valued components that were excluded for reasons of “technical feasibility” and describe the availability of baseline information and level of understanding of how the project could affect the valued component and how any deficits will be addressed.
19.	Section 5.1 Valued Components Selected Page 39	The Project Proposal identifies Valued Components selected for the assessment. This section does not include surface water quantity.	Section 2.1.1.2 states that up to 100 cubic metres (m3) of water may be withdrawn daily from the Eagle River or Ogilvie River.	Please consider surface water quantity as a Valued Component and provide a rationale for its exclusion if appropriate.
20.	Section 5.2.5 Fish and Wildlife Harvesting Page 45	The Project Proposal states that although the Project has the potential to impact caribou migration and in turn caribou hunters, Fish and Wildlife Harvesting was not considered as a VC because these effects will be mitigated by measures from the Wildlife and Wildlife	Given the potential for Project interactions with the Porcupine Caribou Herd and moose, evaluating the corresponding impact to VGFN Fish and Wildlife Harvesting is necessary to ensure that Project impacts are adequately assessed and that appropriate mitigation,	Please include Fish and Wildlife Harvesting as a VC with the inclusion of Project impact pathways, effects, mitigations and monitoring of VGFN caribou and moose harvest. Please additionally describe the Proponent’s plans to engage

Habitat section. The Proponent cites human health and safety as potential Project impacts on caribou hunters, but does not address impacts to VGFN rights and use of the land for caribou harvest.

monitoring and adaptive management measures are in place. Fish and Wildlife Harvesting must be considered as a VC to address the potential Project impacts on VGFN rights and land use for caribou and moose harvesting.

Furthermore, VC scoping and subsequent effects characterization and determination for Fish and Wildlife Harvesting should be informed through consideration of VGFN knowledge to ensure that the analysis is grounded in the best available science and Indigenous knowledge.

with VGG to identify baseline conditions related to VGFN land use and harvesting and potential impacts of the Project on VGFN land use and harvesting.

21. Section 5.2.10
Traditional
Land Use
Page 46

The Project Proposal states, "Given the scope (i.e., spatial and temporal), relative scale, and nature (i.e., abandonment and reclamation of 6 wells) of this Project, impacts on the ability of First Nations to enjoy traditional pursuits on the land are not expected. Project activities are not expected to have lasting interaction with traditional land use beyond the

The rationale provided for excluding traditional land use from further assessment is insufficient. Despite its relative scale, the Project has the potential to extend and compound existing adverse impacts on traditional land use. Following completion of the project, well abandonment has the potential to re-establish traditional use (a beneficial

Please provide an assessment of the Project's potential impacts on traditional use, including how the Project may extend and compound existing impacts. Please indicate how such impacts will be mitigated.

This assessment should consider cultural impacts,

Project's construction schedule; therefore, this candidate VC was not considered further in this assessment."

effect). Note that the Project may result in the abandonment of 3 wells, with 3 wells reverting to suspended status. These potential effects need to be assessed and characterized.

including disruption of cultural transmission.

The assessment may also consider any beneficial impacts on traditional use resulting from well abandonment, including measures to enhance traditional use following such abandonment.

Please identify the Proponent's plans to collect baseline information regarding traditional use in the project area and how such information will inform Project activities.

22. Section 6.1
Wildlife and
Wildlife Habitat
Page. 47

The Proponent appears to have based the wildlife and wildlife habitat existing conditions and effects pathways sections on western science, only. This represents a gap due to lack of consideration of Indigenous knowledge in identifying baseline conditions and impact pathways.

Indigenous knowledge should be included to ensure that a holistic understanding of wildlife and wildlife habitat informs the characterization of baseline conditions and impact pathway mechanisms.

Please identify plans to engage with VGG to conduct an Indigenous ecological knowledge study related to caribou and moose ecology, spatial and temporal distribution, and preferred seasonal habitat areas in the Project area (for this Project or the Eagle Plains Exploration Project). Please indicate how the preliminary or final results

				of this study may be drawn on to inform Project activities.
23.	Section 6.1.2.2 Project Interactions with Moose Page 52	The Proponent states that physiological stress responses and behaviour changes for moose “are not anticipated to occur for this Project because moose can move away from the work areas to avoid them.” The Proponent has not provided spatial data to support the underlying assumptions of moose distribution and habitat use.	Without clear evidence outlining moose distribution and habitat, predator (e.g. wolf) distribution and habitat, the zone of influence for Project-related sensory disturbance and the zone of influence for any existing disturbance for the area of interest it is not possible to sufficiently evaluate the validity of the Proponent’s statement that moose will be able to move away from Project work areas to avoid sensory disturbance.	Please provide a description and map(s) of the following spatial data for the area in the vicinity of the Project: <ul style="list-style-type: none"> • Moose distribution and preferred seasonal habitat areas • Wolf distribution and preferred seasonal habitat areas • Zone of influence for sensory disturbance from the Project • Zone of influence for any existing sensory disturbance • Any existing linear or polygonal disturbance features
24.	Section 6.1.4.1 Caribou (Effects Characterization and	The Project Proposal states that the Project will not have a significant effect on caribou because the project and zone of influence is a small proportion	Although the Proponent referenced a study (Russell and Gunn 2017) of overlap between the Porcupine Caribou Herd and a similar project, the Proponent	Please provide a detailed description and map(s) to contextualize potential Project impacts on caribou within the results of the referenced study.

Significance)
Page 55

of the caribou herd's winter range, the winter season is of low importance for caribou, the most likely effect is temporary, localized avoidance and the Project will not create new access features.

has not provided sufficient Project-specific data or maps that frame the proposed Project impact pathways within the results of the referenced study. Lack of clarification to spatially and temporally link the results of the referenced study with the proposed Project makes it difficult to sufficiently assess the accuracy of the Proponent's claims regarding caribou habitat range and alternative habitat.

The updated description and map(s) should illustrate any spatial and temporal overlap between the following:

- Porcupine Caribou Herd range and distribution (e.g. telemetry data)
- Preferred seasonal caribou habitat areas
- Caribou migration corridors
- Predator (e.g. wolf) range, distribution and habitat areas
- Chance Oil and Gas Limited Project Eagle Plains Well Maintenance Project area and zone(s) of influence for caribou
- Project area and zone(s) of influence from Russell and Gunn (2017)
- Any existing linear and polygonal disturbance and zone(s) of influence

Where information is lacking, please identify how this influences the level of confidence in assessment conclusions and the monitoring and adaptive management measures that will be used to address remaining uncertainty.

Reference:

Russell, Don, and Anne Gunn. 2017. "Assessing Caribou Vulnerability to Oil and Gas Exploration and Development in Eagle Plains, Yukon." Yukon Department of Energy, Mines and Resources.

25. Section 6.1.4.2
Moose (Effects
Characterization
and
Significance)
Page 59

The Project Proposal states that Project effects on moose will not be significant because the Project constitutes a small proportion of moose winter range and alternative habitat is available, the most likely effect is temporary localized avoidance and the Project will not create new access features.

The Proponent has not provided a Project-specific analysis of the overlap of the Project with moose winter range, distribution and preferred habitat, predator distribution and habitat and any existing disturbance. It is not possible to assess the validity of the Proponent's assertion that the Project accounts for a small proportion of moose winter range and alternative habitat is

Please provide the following information:

- a) Project-specific assessment of the overlap between the Project and moose range, preferred seasonal moose habitat areas and distribution, predator distribution and habitat areas as well as any existing linear or polygonal disturbance features within

		<p>available because the Proponent has not provided any evidence to support this claim.</p> <p>The Proponent has additionally neglected to provide a Project-specific analysis of moose avoidance of sensory disturbance, and has failed to adequately consider the potential for re-establishment of winter roads to facilitate predator movement and prey mortality.</p>	<p>the Project's zone of influence and the moose range.</p> <p>b) Description and maps of the spatial data used to conduct the Project-specific assessment.</p> <p>c) Updated effects characterization for moose based on any updated assessment results for moose.</p>
<p>26. Section 6.2.4 Effects characterization and Significance Determination: Disturbance to Rare Plants Page 69</p>	<p>The Project Proposal describes potential impacts to rare plants but does not appear to consider Project impacts to plant species of cultural importance to VGFN.</p>	<p>Consideration of VGFN culturally important plant species is necessary to ensure that VGFN rights and interests are protected. For example, Tamarack is a culturally important plant that is rare in the context of VGFN's traditional territory. Additionally, red ochre is a culturally important mineral that should be avoided.</p>	<p>Please clarify as to whether attempts were made by the Proponent to characterize Project effects to VGFN culturally important plants. The Proponent should furthermore engage with VGG to identify areas that should be avoided if the project is to proceed.</p>