



## SAHTU RENEWABLE RESOURCES BOARD

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Larry Wallace  
Sahtu Land and Water Board

*Delivered via email*

January-17-13

***RE: Explor Geophysical Ltd. Program Amendment (Type A Land Use Permit S11B-004)***

Dear Mr. Wallace:

The SRRB has reviewed the subject program amendment. We note that the general approach to the seismic activity does not differ from already licensed activities.

We are aware that although the Tulit'a and Norman Wells RRCs have submitted letters of support for the proposed amendment, this support is qualified by concerns about potential impacts. The Tulit'a Renewable Resources Council (RRC) has expressed concerns based on their ecological knowledge of the specific locations of the new proposed seismic lines. Moreover, the Norman Wells RRC has requested more information about planned mitigations related to the new lines. Such information is not provided with the amendment proposal. We would like to echo the requests from the two RRCs that Explor to provide this information.

Explor's approved program does not follow current industry best practices for seismic exploration. This being said, we appreciate that Explor has shown willingness to work with the SRRB and RRCs in developing protocols for monitoring wildlife through a project proposed to the Cumulative Impact Monitoring Program (CIMP). In a letter to ENR, Explor has also committed to meeting with RRCs, the SRRB, and ENR to address any concerns about impacts of increased access to wildlife harvesting opened up by the seismic lines. We support this meeting, and would further propose that the meeting address a range of additional key topics, including:

- Results of last year's monitoring, with an assessment of impacts and discussion of potential mitigations.
- Development of improved monitoring standards, protocols and methods.
- Possibilities for reducing seismic line widths, and any other low impact methods that could be adopted or improved, including means of acquiring updated, lower impact equipment.

Thanks for the opportunity to comment on this program amendment.

Sincerely,

Deborah Simmons  
Executive Director