



Shell Canada Limited

<contact information removed>

November 4, 2013

Lisa King
Director, Athabasca Chipewyan First Nation IRC
<contact information removed>

Dear Ms. King:

Re: Shell Canada Limited (Shell)
Use of ACFN Traditional Knowledge in Appendix 7.0, Appendix 2.0, and Appendix 3.8 of Shell's Response to the JRP SIRs for PRM

In accordance with ACFN/Shell Traditional Knowledge (TK) sharing agreement which outlines the terms and conditions by which Shell will use ACFN's TK in Shell's project development, Shell provided ACFN with the relevant portions of its draft responses to the Pierre River Mine Joint Review Panel (JRP) Supplemental Information Requests (SIRs) on October 2, 2013.

Shell received ACFN's letter entitled *Use of ACFN Traditional Knowledge in Appendix 7.0, Appendix 2, and Appendix 3.8 of Shell's Response to the JRP SIRs for PRM* on October 16, 2013.

Shell appreciated ACFN's prompt feedback. We have reviewed and modified, where practical, Appendices 2.0, 3.8 and 7.0 to address ACFN's comments. Shell's revisions focused on clarifying references and quotations, clarifying the language used when interpretation from original source material was required, and clarifying ACFN's traditional territory boundaries considered in the assessment. The updated appendices will be included as part of Shell's PRM SIR Response to the JRP. As noted in the sharing agreement, ACFN's concerns may warrant further discussions, and Shell is willing to continue the discussion of these concerns at future consultation sessions.

In regards to ACFN's concerns regarding Shell's reason for conducting the review of First Nations' culture, traditional knowledge, and the scope of the review, Shell would like to point out that the review was requested by the JRP, and that the scope was set out in PRM's JRP Terms of Reference. However, in order to address ACFN's concerns in this regard, Shell has added a clarifying statement to Appendices 3.8 and 7.0 to inform reviewers of the summarizing nature of Shell's review, as well as the purpose and perspective of the documents that were considered.

Shell would like to address two of ACFN's key review comments pertaining to the three appendices:

- The first comment states that the Shell documents do not explicitly distinguish factual ACFN information from the interpretive language of the authors. In preparing a concise review based on multiple lengthy literature sources, it is reasonable and necessary to paraphrase, summarize and

interpret the information contained in the source material. Based on ACFN's feedback, Shell has attempted to further clarify this distinction in the information provided as part of the final submitted appendices and has included a disclaimer that all source material should be reviewed.

- The second comment is that Shell has minimized and undermined ACFN's Traditional Knowledge and their concerns and/or implied that the responsibility for impacts lies with Aboriginal persons. Shell has no intention of minimizing or undermining the information provided by ACFN, or implying responsibilities as part of this submission. Paraphrasing and summarizing by its very nature may simplify information or omit words the ACFN believe are important for the JRP to be aware of. Due to this practical limitation, Shell is recommending that the JRP and other reviewers review the referenced source material in its entirety to have a complete perspective of the ACFN information provided in those documents. Language providing this guidance to the reader has been added to Appendices 3.8 and 7.0.

The ACFN also states in their October 16, 2013 letter that several relevant ACFN publications that should inform any Environmental Setting Report were not reviewed by Shell. However, no references to these additional publications were provided. Shell would appreciate if ACFN could provide references to these publications so that they may be used in the future.

A number of concerns are raised in the letter that have been previously addressed in Shell's responses during the consultation process with ACFN and were addressed in Shell's responses to ACFN's technical review of the PRM applications. These include topics such as the scope of the human health risk assessment, the use of Key Indicator Resources to represent multiple species, and water flows in the Athabasca River.

Shell appreciates the ongoing participation of the ACFN in consultation on the Project. Should there be any questions or concerns pertaining to this letter, please contact Sandi Morrisseau at 403-691-3259.

Kind regards,

<original signed by>

Sandi Morrisseau
Manager, Consultation
<contact information removed>