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July 7th, 2023

Mr. Roy S. Belden
Vice President
Moraine Initiatives Limited
4000, 421 – 7th Avenue SW
Calgary AB
T2P 4K9

Moraine Power Generation Project
Impact Assessment Agency of Canada
(IAAC)
9700 Jasper Avenue, Suite 1145
Edmonton, Alberta T5J 4C3

Dear Mr. Belden and IAAC,

The following information is intended to provide comments on the Project Description Summary for the Moraine Power Generation Project.

Section 2.1 Indigenous Engagement

1. Métis Nation of Alberta (MNA) Region 5 was not identified in the use of the LAIRT process by the proponent or IAAC.
2. How will this project advance reconciliation? I suggest the project will require reconciliation planning with Indigenous communities, measurable goals, transparency in reporting and commitments over the longer term during construction activities, startup and operations.
3. Since MNA Region 5 was not identified in the LAIRT process, how can this project provide for meaningful engagement with our community?

Section 3.2 Purpose of and Need from the Project Description Summary

There is very little information and numbers in the description on how the project will supply reliable, affordable, and on-demand low-emitting electricity generation to Albertans.

I wonder if there is further information on how this project could potentially affect the Alberta wholesale electricity market structure. Could there be a short or long term financial impact to the residential consumers in Alberta from increased electricity added to the grid or rising natural gas prices due to the use of 85,000 GJ/d of natural gas to



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generate 465 megawatts of power? I don't consider myself well-informed on these subjects so please add more detail.

Section 3.3 Alternatives to and Alternative Means of Carrying Out the Project

I wish to know more about the options for the facility siting. Please provide further information.

Section 3.4.1 Construction

Please provide applicable onsite and offsite general construction schedules to Indigenous groups at least 60 days prior to requesting contractors to solicit bidding packages to undertake the construction work.

Further information is required on the following items,

- Construction of the water supply system, offsite or onsite.
- Installation of Stormwater Management, erosion prevention, and sediment control including the use of berms around the project area.
- Construction of the CO₂ and NG pipelines and electrical transmission line.
- Safety, environmental and emergency management of the construction work.
- The installation details and depth/geological formation of the disposal well.

3.4.2 Operations

Further information is required on the following items,

What kind of chemicals and their annual usage amounts are required for the operation of the facility on a yearly basis? What are the safety and environmental controls during construction?

3.4.4 Physical activities incidental to the Project

Further information is required on the following items,

More information on the Parking lot siting and all vehicle and access from the highway

More information on the control building and the storage warehouse as well as any potential temporary construction offices and large structures/lay down areas.



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3.6 Project Emissions, Discharges and Waste

What is the plan to dispose of liquid discharges during construction prior to installation of the disposal well?

3.7.1 Project Location, Land and Water Use

It is assumed that the 12 km CO₂ pipeline and the 30 km Natural Gas pipeline will fall under the regulations of the CER since the project is under review by IAAC. If the pipelines intersect significantly sized tributaries of the Athabasca River, I prefer that HDD methods be used to install the pipelines rather than open cut methods to cross rivers and streams.

3.7.2 Project Water Use

The water draw of 833,000 liters per day may likely require several groundwater wells that will have to optimally placed on or near the Project area. I would be concerned if a sustainable yield of water for the project would result in a significant lowering of the water table.

4.0 Regulatory Context

The federal government co-developed an Action Plan for implementation of UN Declaration on the Rights of Indigenous Peoples Act (UNDA) was published on June 21, 2023. It's important for this project that the project proponent addresses UNDA within the regulatory context. The following information provides direction on this project.

“The implementation of the UN Declaration will inform how the Government approaches meeting these legal duties going forward. It will do so in a way that provides greater clarity and creates greater certainty over time for Indigenous groups and all Canadians”ⁱ.

“The UN Declaration Act mandates the Government of Canada to not only consult with Indigenous peoples, but also cooperate with them. This means that Indigenous peoples have the opportunity, including through their representative organizations, to participate in and to positively influence federal decision-making processes with adequate time and supported by adequate resources.”ⁱⁱ

5.2.2 Surface Water and Fish Habitat



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It's important that any vegetation management treatment by chemicals not be allowed to runoff offsite where it can be carried by groundwater and still be chemically active by the time it reaches the Athabasca River to adversely affect and/or potentially pollute fish habitat and wildlife. MNA Region 5 members should be allowed to undertake a Traditional Land Use Project at the PGF.

5.2.3 Vegetation and Wetland Resources

MNA Region 5 members should be allowed to undertake a Traditional Land Use Project on the proposed 12 and 32 km pipeline Right of Way's (ROW) and the Power Tower Structure locations and it's 10 km ROW to observe the vegetation.

5.2.4 Wildlife and Wildlife Habitat

MNA Region 5 members should be allowed to undertake a Traditional Land Use Project on the proposed 12 and 32 km pipeline Right of Way's (ROW) and the Power Tower Structure locations and it's 10 km ROW to observe the Animal signs and trails.

5.4.1 Project Related Effects to Indigenous Groups

Please provide Economic Development bidding opportunities to Indigenous contracting services during the construction project phase and quality Indigenous employment opportunities during the construction phase and also longer-term operations phase.

This concludes the MNA Region 5 review of the Project Description Summary for the Moraine Power Project.

Walter Andreeff BSc.
Consultation Coordinator
MNA Region 5

ⁱ Department of Justice Canada, Implementing the United Nations Declaration on the Rights of Indigenous Peoples Act, June 28, 2023, <https://www.justice.gc.ca/eng/declaration/index.html>.

ⁱⁱ Department of Justice Canada, United Nations Declaration on the Rights of Indigenous Peoples Act Action Plan, June 21, 2023, <https://www.justice.gc.ca/eng/declaration/ap-pa/ah/index.html>.