



***“Bad administration, to be sure, can destroy good policy; but good administration can never save bad policy” Adlai Stevenson, Sept 11, 1952***

September 26, 2017

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Dear Premier Notley, Premier of Alberta:

Dear Honourable Richard Feehan:

Dear Honourable Deron Bilous:

Dear Honourable Shannon Phillips:

The Canadian Association of Petroleum Landmen would like to address some unfortunate developments with the Aboriginal Consultation Office. First, CAPL wishes to reassure the Government that communication with the various levels of the ACO have been first rate and requests for assistance have been met with and responded to very well.

Currently energy companies are experiencing increased time lines on receiving pre-consultation assessments and adequacy assessments for proposed projects on Crown lands. This is unfortunate and concerning for several reasons. For instance, in the case of pre-consultation assessment, the timeline diverges from the stated timeline expectation in the GoA’s Guidelines for Consultation with First Nations on Land and Natural Resource Management. In the early days of the ACO the timeline was acceptable and understandable if it passed typically stated timelines of 4 – 10 days depending the level of consultation required. Gradually the timeline has grown to what proponents have indicated to our office is 4 weeks. The current timeline for adequacy assessments is running at about 4 – 6 weeks. The ACO has indicated they are aware they are experiencing delays and are working to resolve the issues. Thank you to the office for the effort to clear the backlog but it still does not cure the concern. Consider that industry is entering its busiest period, the winter drilling season. Further complicating this are other policies, wetlands reviews for instance, that are now effectively narrowing the operating window on Crown lands. In addition, it must be recognized the level of activity is clearly less than the number of projects licensed prior to the dive in oil prices – pre 2014. Not that anyone is anticipating a rebound in prices to those heady levels any time soon but the concern remains that, should there be, through some fortuitous circumstances, a renewal of activity approximating those halcyon days one cannot wonder the ACO would be permanently overwhelmed and



industry would slow inexorably. Now no one expects that to happen but the increased timelines from the stated 4 – 10 days for pre-consultation and 10 days for adequacy assessment in the guidelines to 4 - 6 weeks seems entirely excessive. Part of a solution we would suggest to streamline the process would be to have regulatory bodies sync applications to run in parallel.

The CAPL, on behalf of its members, asks if there is not some direction you can provide to cure this backlog and prevent a similar occurrence in the future. I am always open to a conversation as well and I can be reached at [president@landman.ca](mailto:president@landman.ca) or at my office at (403) 774-2906. Thank you again for this opportunity to present our opinion on these matters.

Thank you,  
Sincerely,

**Larry Buzan, P.Land**  
**President, CAPL 2016-2017**

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