



December 15, 2022

Ref. 117812

VIA EMAIL: [chiefjoe@tletincox.ca](mailto:chiefjoe@tletincox.ca)

Chief Joe Alphonse  
Tla'etinqox Government  
PO BOX 168  
Alexis Creek, BC V0L 1A0

Dear Chief Joe Alphonse:

**RE: Proposed regulatory amendments under the *Oil and Gas Activities Act*, the *Petroleum and Natural Gas Act*, and the *Energy Statutes Amendments Act*, 2022**

I am writing to provide you with an overview of multiple regulatory amendments and supporting policy development that the Ministry of Energy, Mines and Low Carbon Innovation (EMLI) is proposing.

The proposed regulatory amendments can be described as follows:

- amendments to bring the *Energy Statutes Amendment Act*, 2022 (Bill 37) into force, and
- amendments to the Petroleum and Natural Gas Storage Reservoir Regulations under the *Petroleum and Natural Gas Act* (PNGA).

EMLI is also presently developing other regulatory amendments and policies that your Nation may be interested in:

- amendments to bring into force changes to the *Heritage Conservation Act* (HCA) authorities under the *Oil and Gas Activities Act* (OGAA);
- potential changes to permit application disclosure requirements within the OGAA General Regulation; and
- exploring options for improving pipeline crossing safety under OGAA.

Some of these proposed regulatory amendments stem from the legislative changes EMLI wrote to you about in March and July of 2022. This past engagement was on the topics of:

- expanding the jurisdiction of the BC Oil and Gas Commission (Commission) to include the regulation of hydrogen;
- renaming and restructuring the Commission; and
- changes to the deep underground pore space resource management for carbon capture and storage activities.

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EMLI is working to advance and uphold British Columbia's (BC) commitment to reconciliation, as outlined in the *Declaration on the Rights of Indigenous Peoples Act* (Declaration Act). Consultation and cooperation with Indigenous Peoples are an important part of the development of the proposed regulatory amendments addressed in this letter. We are undertaking this engagement in support of the ministry's commitment to ensure that the laws of BC are consistent with the United Nations Declaration on the Rights of Indigenous People (UNDRIP), and section 3 of the Declaration Act. We have identified that the proposed regulations intersect with Articles 11, 12, 18, 19, 26, 29, 31, 32 and 38 of UNDRIP.

EMLI proposes to bring these amendments forward in 2023. We invite you to participate in the continued consultation. Further details about these amendments follows in this letter and appendices.

#### Overview of the proposed regulations to bring the *Energy Statutes Amendments Act, 2022* (Bill 37) into force

With respect to the *Energy Statutes Amendments Act, 2022* (Bill 37), EMLI is proposing regulations that will bring into force aspects of Bill 37. Bill 37 renames and restructures the Commission and expands its jurisdiction to include the regulation of hydrogen production. Amendments are being proposed to various regulations under multiple Acts to support the implementation of Bill 37, such as updating references to the Commission. These amendments would have no direct impacts on land or resource use themselves. Any subsequent regulatory decisions taken by the Commission that have potential to impact rights held by Indigenous Nations would require comprehensive consultation.

#### Amendments to the Petroleum and Natural Gas Storage Reservoir Regulations under PNGA

The proposed changes to the storage reservoir tenure provisions are to update the application requirements and to provide clarity for industry (and others) on the tenure process in regulation. These changes would provide for the consideration of specific key matters when evaluating an application for a storage reservoir licence, including effects on Indigenous Nations and section 35 rights, as well as provide for greater government oversight of the storage reservoir licence transfer process. The amendments will support the regulation of carbon capture and storage projects and the Province's Clean BC plan and roadmap. The proposed regulatory amendments follow legislative amendments to the PNGA in the *Natural Gas Development Statutes Amendment Act, 2015* and the *Energy Statutes Amendment Act, 2022* which recently received Royal Assent. The specifics of the proposal are identified in Appendix 1.

#### Amendments to the *Heritage Conservation Act* authorities under OGAA

The proposed changes to OGAA will bring into force Section 1 of Bill 15, *Energy, Mines and Petroleum Resources Statutes Amendment Act, 2018*. This will enable the BC Oil and Gas Commission (the Commission) to use specified enactment authorities to exercise powers under sections 12.2 and 12.3 of the HCA. A summary of the proposed HCA specified enactment Order in Council is provided in Appendix 2.

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Potential changes to the permit application disclosure requirements within the OGAA General Regulations

EMLI is considering amendments to the OGAA General Regulation that would maintain a requirement to have permit applications available to the public but additionally enable the Commission to withhold parts of an application, such as proprietary business information or information that would be harmful to an Indigenous People if disclosed.

Indigenous Nations interested in hearing more as this policy develops or wishing to provide feedback on the proposal are encouraged to respond to this letter.

Exploration of options for improvements to the pipeline crossing safety under OGAA  
Regulatory amendments are being considered by EMLI for the following aspects of pipeline safety:

- pipeline and Right of Way (RoW) crossing by heavy loads (equipment and vehicles);
- other surface loads (structures without foundations and storage areas) in the vicinity of pipelines and their RoWs; and
- excavation practices (using machinery near pipelines).

Changes are being considered to strengthen these aspects of pipeline safety, which may require regulatory amendments under the OGAA to build a more comprehensive pipeline integrity and damage prevention framework. Indigenous Nations land planning and development interests may be impacted by this policy change. Indigenous Nations interested in hearing more as this policy develops or wishing to provide feedback on the proposal are encouraged to respond to this letter.

EMLI is committed to consulting with Indigenous Nations on these proposed regulations and policy considerations. As stated above, we are proposing to bring these regulations forward in 2023. We welcome any questions, comments, or feedback that you may have on the proposed regulations by January 31, 2023.

To support consultations and engagement between you and EMLI there are funds available. For more information about this funding or on the subjects in this letter please do not hesitate to contact Evan Hauser, Indigenous Engagement Lead, Regulatory Policy, at [OGDConsultation@gov.bc.ca](mailto:OGDConsultation@gov.bc.ca).

Thank you in advance for your time and consideration.

Sincerely,



Nathaniel Amann-Blake  
Assistant Deputy Minister  
Oil and Gas Division

## **Appendix 1: Summary of proposed amendments to the Petroleum and Natural Gas Storage Reservoir Regulations**

Summarized below are the proposed regulatory amendments that follow legislative amendments to:

- The *Petroleum and Natural Gas Act*<sup>1</sup> (PNGA) in the *Natural Gas Development Statutes Amendment Act, 2015*<sup>2</sup> and the *Energy Statutes Amendment Act, 2022*<sup>3</sup>.

Proposed Action	<ul style="list-style-type: none"><li>• Bring storage reservoir licence related amendments into force:<ul style="list-style-type: none"><li>○ <i>Natural Gas Development Statutes Amendment Act, 2015</i> – primarily clauses 28 and 29;</li><li>○ <i>Energy Statutes Amendment Act, 2022</i> – primarily clauses 48 and 50.</li></ul></li><li>• Change references from “lease” to “licence”.<ul style="list-style-type: none"><li>○ This is a result of the amendments in the <i>Energy Statutes Amendment Act, 2022</i> which change lease of a storage reservoir to storage reservoir licence.</li></ul></li><li>• Broaden the scope of who can apply for a storage reservoir licence.<ul style="list-style-type: none"><li>○ Currently a person must hold specific permits, licences or leases in order to apply. We are proposing to remove this limitation.</li></ul></li><li>• Update the application requirements for an exploration licence and a storage reservoir licence.<ul style="list-style-type: none"><li>○ The application requirements under the existing regulation currently refer to the oil and gas handbook which is out of date and not readily available.</li><li>○ The proposed new application requirements are not as detailed or specific as those identified in the handbook because more detailed information is required when applying to the BC Oil and Gas Commission for the authorizations required to undertake storage or exploration activities.</li></ul></li><li>• Allow for the publication of certain application information.<ul style="list-style-type: none"><li>○ The published information is proposed to include date of application, name of applicant, proposed area and proposed substances to be stored.</li></ul></li><li>• Require the Minister to consider specific matters when evaluating an application for a storage reservoir licence.<ul style="list-style-type: none"><li>○ Some matters currently contemplated are:</li></ul></li></ul>

<sup>1</sup> *Petroleum and Natural Gas Act* (PNGA):

[https://www.bclaws.gov.bc.ca/civix/document/id/complete/statreg/96361\\_01](https://www.bclaws.gov.bc.ca/civix/document/id/complete/statreg/96361_01)

<sup>2</sup> *Natural Gas Development Statutes Amendment Act, 2015*:

<https://www.bclaws.gov.bc.ca/civix/document/id/lc/billsprevious/4th40th:gov40-1>

<sup>3</sup> *Energy Statutes Amendment Act, 2022*:

<https://www.bclaws.gov.bc.ca/civix/document/id/bills/billscurrent/3rd42nd:gov37-1>

	<ul style="list-style-type: none"> <li>▪ The effects of a storage licence on Indigenous Nations and rights recognized and affirmed by section 35 of the <i>Constitution Act, 1982</i><sup>4</sup></li> <li>▪ the best use of the proposed storage reservoir</li> <li>▪ the use of groundwater.</li> <li>▪ supporting a diverse oil and gas sector.</li> <li>▪ Government's emission reduction targets.</li> </ul> <ul style="list-style-type: none"> <li>• Require a minimum size of a storage reservoir licence. <ul style="list-style-type: none"> <li>○ The minimum size is proposed to be four (4) contiguous units (as defined in the Petroleum and Natural Gas Grid Regulation).<sup>5</sup></li> </ul> </li> <li>• Require a minimum depth of a storage reservoir. <ul style="list-style-type: none"> <li>○ The minimum depth is proposed to align with the depth criteria for deep groundwater in section 51 of the Water Sustainability Regulation under the <i>Water Sustainability Act</i>. Some exceptions may be contemplated.</li> </ul> </li> <li>• Set a term for a storage reservoir licence. <ul style="list-style-type: none"> <li>○ The term is proposed to be 15 years and can be renewed on one or more occasions for up to 15 years.</li> </ul> </li> <li>• Allow for the extension of a storage reservoir licence. <ul style="list-style-type: none"> <li>○ Allow for a licence to be extended for up to two (2) years on one or more occasions.</li> </ul> </li> <li>• Allow the Minister to add conditions to a licence.</li> <li>• Provide government oversight to the transfer of a storage reservoir licence. <ul style="list-style-type: none"> <li>○ The transfer must be approved by the Minister and the Minister may approve if satisfied that the safe development or use of the storage reservoirs would not be compromised.</li> </ul> </li> </ul>
Background	<ul style="list-style-type: none"> <li>• Storage reservoirs may be used to store petroleum, natural gas, carbon dioxide, and/or water produced from the production of petroleum or natural gas, waste or other prescribed substances underground.</li> <li>• The goal of the changes to the storage reservoir licence related provisions is to: <ul style="list-style-type: none"> <li>○ update the application requirements, and</li> <li>○ provide clarity for industry (and others) on the tenure process in regulation, specifically to support carbon capture and storage (CCS).</li> </ul> </li> </ul>
What this could mean for Indigenous Nations	The proposed amendments to the PNGA would create a new scheme for issuance of licences to storage reservoirs. While there is no immediate impact to land and resources from the amendments themselves, there is the potential for future surface disturbance

<sup>4</sup> The *Constitutions Acts, 1867 to 1982*, <https://laws-lois.justice.gc.ca/eng/const/page-13.html#h-53>

<sup>5</sup> Petroleum and Natural Gas Grid Regulation:  
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	<p>associated with the storage reservoir use, likely for carbon dioxide storage, when licences are issued.</p> <p>These activities could affect:</p> <ul style="list-style-type: none"> <li>• how hunting, fishing, trapping, gathering or other cultural activities would be exercised by Indigenous Nation members if development overlaps with areas where those activities occur or alters the area's ability to support the plants and animals previously living at a site;</li> <li>• how land will be managed or developed;</li> <li>• access to land for other reasons, and subsequent economic benefits derived therefrom.</li> </ul> <p>These surface disturbances can take place over an extended period of time as well sites, facilities and pipelines. The lifespan of a well can vary from a few years to many decades, for example.</p> <p>Consultation with potentially affected Indigenous Nations would occur prior to issuance of storage reservoir licences and, as noted above, the Ministry is considering specifying in the regulations that effects on Indigenous Nations and s. 35 rights must be considered.</p>
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## Appendix 2: Amendments to the *Heritage Conservation Act* authorities under the OGAA

Summarized below are the proposed changes to:

- the *Oil and Gas Activities Act*<sup>6</sup> (OGGA) by regulation bringing into force Section 1 of Bill 15, *Energy, Mines and Petroleum Resources Statutes Amendment Act, 2018*<sup>7</sup>.

The objective of this proposed change is to provide a more coordinated process for heritage resource protection.

Proposed Action	<ul style="list-style-type: none"><li>• The proposed regulation would bring into force section 1 of Bill 15, <i>Energy, Mines and Petroleum Resources Statutes Amendment Act, 2018</i>.</li><li>• This would, for the regulation of oil and gas activities, give the BC Oil and Gas Commission (Commission) the power to authorize and require heritage inspections and investigations under the <i>Heritage Conservation Act</i><sup>8</sup> (HCA).</li><li>• Specifically, the proposed regulation would transfer the following authorities under the HCA from the Ministry of Forests to the Commission in cases where a heritage inspection or investigation relates to an oil and gas activity:<ul style="list-style-type: none"><li>○ Authorize heritage inspection and investigations by permit (section 12.2)</li><li>○ Require heritage inspections and investigations by order (section 12.3).</li></ul></li><li>• This would include the authority to:<ul style="list-style-type: none"><li>○ Issue, amend, suspend, or cancel permits</li><li>○ Stipulate requirements, specifications, and conditions for permits and orders</li></ul></li></ul>
Background	<ul style="list-style-type: none"><li>• The purpose of sections 12.2 [Heritage inspection and heritage investigation by permit] and 12.3 [Heritage inspection and heritage investigation by ministerial order] of the HCA is to enable action to strengthen protection and conservation of archaeological sites and objects within specified sites that have potential for heritage value.</li><li>• The Commission is the single-window regulator for oil and gas activities and related activities.</li></ul>

<sup>6</sup> *Oil and Gas Activities Act*: [https://www.bclaws.gov.bc.ca/civix/document/id/complete/statreg/08036\\_01](https://www.bclaws.gov.bc.ca/civix/document/id/complete/statreg/08036_01)

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<sup>8</sup> *Heritage Conservation Act*: [https://www.bclaws.gov.bc.ca/civix/document/id/complete/statreg/96187\\_01](https://www.bclaws.gov.bc.ca/civix/document/id/complete/statreg/96187_01)

	<ul style="list-style-type: none"> <li>• Oil and gas companies often need to complete heritage inspections and investigations in relation to oil and gas activities.</li> <li>• The Commission already has decision-making authority under sections 12.4 to 12. 8 of the HCA. These sections relate to permits authorizing certain actions under that Act.</li> <li>• Heritage inspections and investigations are often closely related to the permits the Commission already issues under the HCA.</li> </ul>
What this could mean for Indigenous Nations	<ul style="list-style-type: none"> <li>• The decision maker for sections 12.2 to 12.3 of the HCA would change from the Ministry of Forests to the Commission with respect to oil and gas activities.</li> <li>• The Commission would become the consolidated regulatory agency issuing permits and orders for heritage inspections and investigations. This may have positive impacts on implementing the protection of cultural artifacts and heritage sites, which is the purpose of these provisions.</li> </ul>





December 19, 2022

Ref. 117812

Executive Director Jenny Philbrick  
T̓silhqot'in National Government  
253 4th Ave N  
Williams Lake, BC V2G 4T4

Dear Executive Director Jenny Philbrick:

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oversight of the storage reservoir licence transfer process. The amendments will support the regulation of carbon capture and storage projects and the Province's Clean BC plan and roadmap. The proposed regulatory amendments follow legislative amendments to the PNGA in the *Natural Gas Development Statutes Amendment Act, 2015* and the *Energy Statutes Amendment Act, 2022* which recently received Royal Assent. The specifics of the proposal are identified in Appendix 1.

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Thank you in advance for your time and consideration.

Sincerely,



Nathaniel Amann-Blake  
Assistant Deputy Minister  
Oil and Gas Division

cc: Chief Jimmy Lulua  
Xeni Gwet'in First Nations Government

Chief Otis Guichon  
Alexis Creek/Ts'ideldel First Nation  
[chief@tsideldel.org](mailto:chief@tsideldel.org)

Chief Joe Alphonse  
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Chief Troy Baptiste  
?Esdilagh First Nation  
[temp@esdilagh.ca](mailto:temp@esdilagh.ca)

Chief Francis Laceese  
Tl'esqox of the Tsilhqot'in  
[chieflaceese@gmail.com](mailto:chieflaceese@gmail.com)

## **Appendix 1: Summary of proposed amendments to the Petroleum and Natural Gas Storage Reservoir Regulations**

Summarized below are the proposed regulatory amendments that follow legislative amendments to:

- The *Petroleum and Natural Gas Act*<sup>1</sup> (PNGA) in the *Natural Gas Development Statutes Amendment Act, 2015*<sup>2</sup> and the *Energy Statutes Amendment Act, 2022*<sup>3</sup>.

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Background	<ul style="list-style-type: none"> <li>• Storage reservoirs may be used to store petroleum, natural gas, carbon dioxide, and/or water produced from the production of petroleum or natural gas, waste or other prescribed substances underground.</li> <li>• The goal of the changes to the storage reservoir licence related provisions is to: <ul style="list-style-type: none"> <li>○ update the application requirements, and</li> <li>○ provide clarity for industry (and others) on the tenure process in regulation, specifically to support carbon capture and storage (CCS).</li> </ul> </li> </ul>
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The objective of this proposed change is to provide a more coordinated process for heritage resource protection.

Proposed Action	<ul style="list-style-type: none"><li>• The proposed regulation would bring into force section 1 of Bill 15, <i>Energy, Mines and Petroleum Resources Statutes Amendment Act, 2018</i>.</li><li>• This would, for the regulation of oil and gas activities, give the BC Oil and Gas Commission (Commission) the power to authorize and require heritage inspections and investigations under the <i>Heritage Conservation Act</i><sup>8</sup> (HCA).</li><li>• Specifically, the proposed regulation would transfer the following authorities under the HCA from the Ministry of Forests to the Commission in cases where a heritage inspection or investigation relates to an oil and gas activity:<ul style="list-style-type: none"><li>○ Authorize heritage inspection and investigations by permit (section 12.2)</li><li>○ Require heritage inspections and investigations by order (section 12.3).</li></ul></li><li>• This would include the authority to:<ul style="list-style-type: none"><li>○ Issue, amend, suspend, or cancel permits</li><li>○ Stipulate requirements, specifications, and conditions for permits and orders</li></ul></li></ul>
Background	<ul style="list-style-type: none"><li>• The purpose of sections 12.2 [Heritage inspection and heritage investigation by permit] and 12.3 [Heritage inspection and heritage investigation by ministerial order] of the HCA is to enable action to strengthen protection and conservation of archaeological sites and objects within specified sites that have potential for heritage value.</li><li>• The Commission is the single-window regulator for oil and gas activities and related activities.</li></ul>

<sup>6</sup> *Oil and Gas Activities Act*: [https://www.bclaws.gov.bc.ca/civix/document/id/complete/statreg/08036\\_01](https://www.bclaws.gov.bc.ca/civix/document/id/complete/statreg/08036_01)

<sup>7</sup> *Energy, Mines and Petroleum Resources Statutes Amendment Act, 2018*:  
<https://www.bclaws.gov.bc.ca/civix/document/id/lc/billsprevious/3rd41st.gov15-1>

<sup>8</sup> *Heritage Conservation Act*: [https://www.bclaws.gov.bc.ca/civix/document/id/complete/statreg/96187\\_01](https://www.bclaws.gov.bc.ca/civix/document/id/complete/statreg/96187_01)



	<ul style="list-style-type: none"> <li>• Oil and gas companies often need to complete heritage inspections and investigations in relation to oil and gas activities.</li> <li>• The Commission already has decision-making authority under sections 12.4 to 12. 8 of the HCA. These sections relate to permits authorizing certain actions under that Act.</li> <li>• Heritage inspections and investigations are often closely related to the permits the Commission already issues under the HCA.</li> </ul>
What this could mean for Indigenous Nations	<ul style="list-style-type: none"> <li>• The decision maker for sections 12.2 to 12.3 of the HCA would change from the Ministry of Forests to the Commission with respect to oil and gas activities.</li> <li>• The Commission would become the consolidated regulatory agency issuing permits and orders for heritage inspections and investigations. This may have positive impacts on implementing the protection of cultural artifacts and heritage sites, which is the purpose of these provisions.</li> </ul>

## Crockett, Janine EMLI:EX

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**From:** Jay Nelson <jay@jaynelsonlaw.com>  
**Sent:** January 12, 2023 5:29 PM  
**To:** Minister, EMLI EMLI:EX  
**Cc:** Minister, IRR IRR:EX  
**Subject:** 118047 - Meeting Request T̓silhqot̓in National Government / Newton Project  
**Attachments:** s.16

**Importance:** High

**[EXTERNAL] This email came from an external source. Only open attachments or links that you are expecting from a known sender.**

Good afternoon,

Please find attached correspondence sent on behalf of the T̓silhqot̓in National Government, requesting a meeting to discuss mining reform in T̓silhqot̓in territory, as well as the immediate conflict in respect of the Newton Project.

I would be happy to assist with arrangements for this meeting. My contacts are below. Please let me know if I can assist in any way.

All the best,

J.

### Jay Nelson

Senior Advisor to the Nits̓il̓in-Qi (Council of Chiefs)  
T̓silhqot̓in National Government  
1729 S. Lakeside Drive, Williams Lake, British Columbia, V2G 3A9  
direct: (250) 305-1828  
email: [jay@jaynelsonlaw.com](mailto:jay@jaynelsonlaw.com)

TNG offices are now fully open to serve the T̓silhqot̓in communities and our staff will be happy to assist you.

**TNG Downtown Office - Ph: (250) 392-3918 – E-mail [reception@tsilhqotin.ca](mailto:reception@tsilhqotin.ca)** to contact TNG staff on regular TNG business.

**TNG Lakeside Office – Ph: (778) 799-2145 – E-mail [receptionn@tsilhqotin.ca](mailto:receptionn@tsilhqotin.ca)**

**TNG Health Office - Ph: (250) 398-8575** – if you have questions or concerns related to COVID-19 or other health matters.

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Page 19 of 29 to/à Page 22 of 29

Withheld pursuant to/removed as

s.16

**From:** [Jay Nelson](#)  
**To:** [Hyam, Ross EMLI:EX](#)  
**Subject:** Re: Correspondence from the T̓silhqot̓in National Government / Newton Project  
**Date:** January 16, 2023 9:42:08 AM

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**[EXTERNAL]** This email came from an external source. Only open attachments or links that you are expecting from a known sender.

Thanks for your note Ross. Do you happen to have any availability on Thursday morning?

---

**From:** Hyam, Ross EMLI:EX <Ross.Hyam@gov.bc.ca>  
**Date:** Thursday, January 12, 2023 at 7:43 PM  
**To:** Jay Nelson <jay@jaynelsonlaw.com>  
**Subject:** Re: Correspondence from the T̓silhqot̓in National Government / Newton Project

Hi Jay,

Thank you for including me in this correspondence. I will work on briefing the Minister and we too will reach out to Carlyle to convey the importance of this meeting.

Would you be open to a call with me in the next week or so to discuss this and anything else that comes to mind? I am open tomorrow afternoon if you are available. Otherwise, if you have times that you are available next week let me know and I am sure we can make something work.

Thank you for your time,

Ross

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**From:** Jay Nelson <jay@jaynelsonlaw.com>  
**Sent:** Thursday, January 12, 2023 5:30:18 PM  
**To:** Hyam, Ross EMLI:EX <Ross.Hyam@gov.bc.ca>  
**Subject:** FW: Correspondence from the T̓silhqot̓in National Government / Newton Project

**[EXTERNAL]** This email came from an external source. Only open attachments or links that you are expecting from a known sender.

Good afternoon Ross, you were copied on this letter from the T̓silhqot̓in National Government to Minister Osborne, attached (with enclosure).

All the best,

J.

From: Jay Nelson <jay@jaynelsonlaw.com>  
Date: Thursday, January 12, 2023 at 5:29 PM  
To: EMPR.Minister@gov.bc.ca <EMPR.Minister@gov.bc.ca>  
Cc: Minister, IRR IRR:EX <IRR.Minister@gov.bc.ca>  
Subject: Correspondence from the T̓silhqot̓in National Government / Newton Project

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All the best,

J.

Jay Nelson

Senior Advisor to the Nits̓il̓in-Qi (Council of Chiefs)

T̓silhqot̓in National Government

1729 S. Lakeside Drive, Williams Lake, British Columbia, V2G 3A9

direct: (250) 305-1828

email: [jay@jaynelsonlaw.com](mailto:jay@jaynelsonlaw.com)<<mailto:jay@jaynelsonlaw.com>>

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Page 26 of 29 to/à Page 29 of 29

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s.16