



Suncor Energy Inc.

Exploration & Production

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VIA EMAIL [submissions@nunavut.ca](mailto:submissions@nunavut.ca)

Nunavut Planning Commission

Box 1797

Iqaluit, NU X0A 0H0

**Attention: Andrew Nakashuk, Commission Chair  
Sharon Ehaloak, Executive Director**

**Re: 2021 Draft Nunavut Land Use Plan (DNLUP)**

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Suncor Energy Inc. (Suncor) is writing to communicate its concerns to the Nunavut Planning Commission (NPC) over the DNLUP and its impacts on future oil and gas exploration and development in Nunavut, as well as the overall consultative process employed by the NPC to arrive at this draft document.

Suncor and its predecessor companies, most notably Petro-Canada, have an extensive exploration history in the Canadian North, including Nunavut. Substantial and material investment (in excess of \$1 billion CAD) was made to acquire and exercise rights to explore and assess the hydrocarbon potential in this region, beginning as early as the 1960s. The numerous Significant Discovery Licenses (SDLs) and associated hydrocarbon resource held today by Suncor are strategic assets that could potentially yield benefits for all at a future point in time if development is feasible and appropriate – not least of which are the socioeconomic benefits that development could deliver to neighbouring Inuit communities. The areas proposed for Limited Use by DNLUP, and the effective prohibition of oil and gas development in these areas will directly impact Suncor's interests in Nunavut, which given the above factors and history is of serious concern to Suncor, as it is tantamount to an expropriation of the assets without any compensation.

In addition, Suncor has concerns with how the NPC ensured all relevant stakeholders were properly engaged and consulted in the development of the DNLUP and its proposed implementation schedule. Suncor was unaware of both the July 2021 release of the DNLUP and the October 8<sup>th</sup>, 2021 deadline for comment until notification was received from Annie Cyr-Parent (Acting Director, Minerals and Petroleum Resources) via email on October 1, 2021. The DNLUP and its supporting documents are substantial in volume, and their resulting impacts on Suncor's interests in Nunavut will require additional time beyond October 8, 2021 to properly understand and provide comment thereon.

In closing, Suncor looks forward to future dialogue and improved collaboration with NPC over the DNLUP, as a responsible path towards economic development of hydrocarbons in Nunavut is forged. Suncor further asks the NPC to directly include Suncor in future consultations regarding this important document.



Yours very truly,

**SUNCOR ENERGY INC., as successor to PETRO-CANADA**

A handwritten signature in black ink, appearing to read 'Ken Saunders', with a horizontal line underneath.

Ken Saunders

Vice President, Engineering & Geoscience, Upstream

Cc: Annie Cyr-Parent, Acting Director, Minerals and Petroleum Resources, Department of Economic Development and Transportation