The Aboriginal Role in the Development of Albertan Oil and Gas Reserves

By

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Executive Summary

Canada is currently the third-largest producer of natural gas and the ninth-largest producer of crude oil in the world and has 15% of oil reserves and 1% of natural gas reserves globally[1]. Successful development of Canadian petroleum reserves largely depends on reasonable and timely access to resources and perceived investment security. Understanding aboriginal issues, such as land claim issues and requirements for consultation, represent a key aspect of achieving timely access to oil and gas resources. This paper examines Aboriginal issues pertinent to the development of oil and gas reserves within Alberta, which holds 80% and 75% of estimated Canadian oil and gas reserves, respectively[2].

After the confederation of Canada in 1867, the Government of Canada sought to develop the new country and thus entered into a series of treaties with various First Nations to enable the active pursuit of settlement, agriculture and resource development in Western and Northern provinces. Under these treaties, the Indian Bands ceded, surrendered and yielded all their rights, titles and privileges to the designated lands to the Crown in exchange for such things as reserve lands and other benefits.[3]

The Canadian legal system is based on common or judge-made law. Consequently, Aboriginal rights are impacted by the interpretation of existing constitutional, treaty or other rulings in legal proceedings. Any legally enforced judicial outcome sets a "precedent" and will thus serve as a rule to guide judges in making subsequent decisions in similar cases. Aboriginal rights are not absolute and they may be infringed upon by a constitutionally competent government, provided that it can justify doing so. Justification of infringement is measured by the Sparrow Test, which includes a component of consultation.

In theory, there are clear boundaries between Federal and Provincial authority, however, in reality, there is substantial gray area. The *Indian Act* gives the Government of Canada jurisdiction over "Indians and Land reserved for Indians" and the *Constitution Act* 1981 gives the provinces jurisdiction over non-renewable natural resources. Case law from the Supreme Court of Canada has determined that the Crown has a fiduciary duty to consult where there is an infringement of an existing aboriginal or treaty right. The exact implications of these findings are the cause of much debate in Canada today.

The Canadian Association of Petroleum Producers (CAPP) has identified several methods for Energy Producers of engaging Aboriginal communities in consultation efforts. These include: Workforce Development initiatives, Business development initiatives, Community relations efforts, Collaborative resource management and Demonstrating Corporate Commitment. [4]

Uncertainty and changing expectations within the legal and regulatory institutions and stakeholder communities are the key challenges in Aboriginal consultation. The key issues are: The legal framework governing Aboriginal engagement and public involvement is based on case law, which continues to develop with the processing of each legal dispute. The federal, provincial and territorial governments each regulate case law and have specific, sometimes overlapping authority in the development of oil and gas reserves. Unresolved, specific treaty land claims. Regulatory requirements represent the minimum guidelines with respect to adequate Aboriginal consultation and engagement.

Aboriginal involvement or consultation is the primary vehicle for understanding and reflecting Aboriginal rights in development projects. In lieu of finalized legal procedures, it is advisable for industry to meet or exceed the currently accepted practices, in order to ensure timely development of their mineral rights holdings.

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1.0 Introduction

Canada is currently the third-largest producer of natural gas and the ninth-largest producer of crude oil in the world; with estimated reserves in Canada of 180 billion barrels of crude oil and 60 trillion cubic feet of natural gas, which represent 15% of oil reserves and 1% of natural gas reserves globally[5]. Development of these reserves represents a great opportunity to both meet future North American energy demand and maintain a strong Canadian economy. Successful development of Canadian petroleum reserves largely depends on reasonable and timely access to resources and perceived investment security.

Understanding aboriginal issues, such as unresolved First Nations Treaty and land claim issues and federal and provincial requirements for consultation on treaty and fiduciary obligations, are key elements of achieving timely access to oil and gas resources. This paper examines Aboriginal issues pertinent to the development of oil and gas reserves within Alberta, which holds 80% and 75% of estimated Canadian oil and gas reserves, respectively[6].

2.0 Overview of Aboriginal Rights Related to Oil and Gas Development in Alberta

2.1 Legal and Political Framework for Canadian Aboriginal Rights

In Canada, the term “Aboriginal people” is a collective name that refers to the original peoples of North America and their descendants or in more specific terms First Nations (Status and Non-status), Inuit and Métis. Current Aboriginal rights are derived from a combination of treaties, or legal agreements between the Crown and the First Nations, the *Canadian Constitution, 1982* and case law.

2.1.1 Treaties

Definition and recognition of Aboriginal rights within what would eventually become Canada commenced in 1701 with the establishment of the first treaty between the British Crown and First Nations[7]. The objective of this landmark treaty, as with other early treaties, was to secure and maintain peace, trade, alliances, neutrality and military support. However, as European settlement grew, treaties were made to both establish relations for peaceful coexistence and acquire Aboriginal lands and resources.

After the confederation of Canada in 1867, the Government of Canada sought to develop the new country and thus entered into a series of treaties between 1871 and 1921, known as the Numbered Treaties, with various First Nations to enable the active pursuit of settlement, agriculture and resource development of the Canadian West and North. The Numbered Treaties cover Northern Ontario, Manitoba, Saskatchewan, Alberta, and parts of the Yukon, the Northwest Territories, Nunavut and British Columbia. Under these treaties, the Indian Bands ceded, surrendered and yielded all their rights, titles and privileges to the designated lands to the Crown in exchange for such things as reserve lands and other benefits like farm equipment and animals, annual payments, ammunition, clothing and certain rights to hunt, trap and fish.[8]

Treaty development continues even today through negotiation and settlement of what are known as specific and comprehensive land claims. Specific claims are based on an outstanding historical grievance between a First Nation and the Crown related to an unfulfilled obligation from an existing treaty or a breach of statutory responsibilities by the Crown. One form of specific claim is known as treaty land entitlement claims, which address situations where First Nations did not receive all the land they were entitled to under treaties signed by the Crown and First Nations. Once land quantum is determined through the negotiation process, a First Nation may purchase federal, provincial (territorial), or private land to settle a land debt.

Comprehensive land claim settlements are based on the recognition that there are continuing Aboriginal rights to lands and natural resources in the parts of Canada where Aboriginal title and rights that have not been previously addressed by treaties or other legal means. Comprehensive claims may address land title, fishing and trapping rights, and financial compensation.

The Inuvialuit Final Agreement in the Western Arctic is an example of a settled comprehensive claim, and in fact is one of the few to have proceeded past the agreement in-principle stage before 1990. Typically, consultation with Aboriginal people is a significant part of the regulatory approval process in areas covered by comprehensive claims (or subject to current negotiations)[9]. Since Alberta is entirely covered by Treaties 6, 7 and 8 there are no comprehensive claims within the province. See the Appendix 1 for a map of Canada, Appendix 2 for a map of Treaty Settlements in Alberta and Appendix 3 for a chronological description of land claim and treaty settlements.

2.1.2 Canadian Constitution

Today, treaty rights, which either existed in 1982 or arose afterwards, are both recognized and affirmed in Section 35 of Canada's Constitution (*Constitution Act, 1982),* which reads:

35(1) The existing aboriginal and treaty rights of the aboriginal peoples of Canada are hereby recognized and affirmed;

(2) In this Act, 'aboriginal peoples of Canada' includes the Indian, Inuit and Metis peoples of Canada.

(3) For greater certainty, in subsection (1) 'treaty rights' includes rights that now exist by way of land claims agreements or may be so acquired.

(4) Notwithstanding any other provision of this Act, aboriginal and treaty rights referred to in subsection (1) are guaranteed equally to male and female persons."

2.1.3 Case Law

The Canadian legal system is based on common or judge-made law. Consequently, Aboriginal rights are impacted by the interpretation of existing constitutional, treaty or other rulings in legal proceedings. Any legally enforced judicial outcome sets a "precedent" and will thus serve as a rule to guide judges in making subsequent decisions in similar cases. Case based law is beneficial in that it makes laws flexible and adaptable to changing circumstances, but equally this can be disadvantageous to creating a secure, stable framework with predictable outcomes, which is necessary to encourage long-term investment.

The landmark legal case, ***R. v. Sparrow*** [1990]**,** which prompted a marked change in the role of Aboriginals in land use and development, was where the Supreme Court of Canada effectively established a duty to consult when projects may have impacts upon First Nations and other aboriginal communities. More specifically, the Supreme Court of Canada said that although the constitutional protection of aboriginal and treaty rights must be taken seriously, it did not mean that such rights were absolute – "no rights are absolute", said the Court[10]. Since aboriginal

rights are not absolute they may be infringed upon by a constitutionally competent government, provided that it can justify doing so.

The Sparrow ruling established that the first question is whether the pending law has the effect of interfering with an existing aboriginal or treaty right[11], where infringement can be established using the following questions:[12]

- First, is the limitation is unreasonable?
- Second, does the regulation impose undue hardship?
- Third, does it deny the holders of the right their preferred means of exercising that right?

The Supreme Court further stated that once infringement has been demonstrated, the Crown must justify regulating the constitutional right under these conditions through following a two stage justification test, known as the Sparrow Test that applies whenever a person seeking to rely on s. 35 established a case of *prima facie* infringement. The Sparrow Test requires that the Crown: [13]

- Establish a legitimate purpose for the infringing legislative or regulatory measure, such as conservation of resource management.
- Demonstrate that the infringement is consistent with the honour of the Crown and the fiduciary nature of the relationship between the Crown and the aboriginal peoples of Canada considering the following:
    - Priority in allocating the resource after conservation objectives have been met is given to First Nation people;
    - There has been as little infringement as possible to achieve the desired result;
    - In an expropriation situation, fair compensation is available;
    - Consultation with the aboriginal group has occurred in relation to the restriction.

The second precedent case was ***R. v. Badger*** [1996] in which the Supreme Court of Canada effectively said that according to the treaties, there is a geographical restriction on the treaty rights, in that as land "is taken up for settlement, mining, lumbering, or other purposes by Her said Government the Dominion of Canada", this incompatible use would restrict the exercising of the right to hunt on those lands.[14] This means that there can be hunting, fishing and trapping

on the remaining lands that have not been “taken up”, and that consultation occurred at Treaty Making, and does not need to occur with each development.

In 1999, the decision in the ***Halfway River First Nation versus British Columbia*** (Ministry of Forestry) defined consultation process as having a proactive element, such that it extends beyond mere notice, as is evident in Justice Finch’s judgment:[15]

> *“The Crown’s duty to consult imposes on it a positive obligation to reasonably ensure that Aboriginal peoples are provided with all necessary information in a timely way so that they have an opportunity to express their interest and concerns, and to ensure that their representations are seriously considered and, wherever possible demonstrably integrated into the proposed plan of action."*

Other cases have shown that where meaningful consultation occurs, there is no duty to reach agreement, and further that the Province is not required to develop a special consultation process to address First Nation’s concerns, outside of current regulations.[16]

A more recent, precedent setting case, which is expected to be appealed at Canada’s Supreme Court in March 2005, is ***Sheila Copps v. Mikisew Cree First Nation***. The results of this case may show that “where a taking up occurs in accordance with treaty, there is no infringement and therefore no requirement to justify under Sparrow”[17], and thus no need to consult. Still, the Court will likely stress that consultation to an appropriate level based on the magnitude of the development occur within the existing, accepted consultation framework.

Notably, there is not legal requirement for the Crown to consult Aboriginals when making regulatory decisions regarding disputed land that has not been resolved. However, in reality the federal government will not proceed with regulatory approval unless developers have consulted the relevant tribes and developed an acceptable cooperation agreement.

2.2 Respective Authorities of the Federal and Alberta Provincial Governments

Like the United Sates of America, Canada is a federal state. The founding vision for Canadian governance, which was reflected in the *Constitution Act, 1867,* was one of a strong, centralized federal government. Consequently the constitution promised that any classes of subjects not specifically assigned exclusively to the Legislatures of the Provinces would fall under Federal or Crown authority. As the precise meaning of the written constitution is settled by the courts, which have in general interpreted the Constitution so as to narrow federal power and widen provincial power, the result is that Canada now has a much less centralized governing structure than originally intended, which includes ten largely self-governing provinces and three territories controlled by the central government.[18]

In terms of division of power, the founding and subsequent constitutional Act expressly gives jurisdiction over the "Indians and Land reserved for Indians" to the Government of Canada. This was later confirmed in the *Indian Act,* which describes a reserve as lands which have been set apart for the use and benefit of a Band, and for which the legal title rests with the Crown in right of Canada.[19]

The *Constitution Act, 1981* gave provincial governments responsibility for certain legal areas, including non renewable energy, as per Section 92A of the Act provides that provincial legislature may exclusively make laws in relation to:

A. *Exploration for non-renewable natural resources in the province;*
B. *Development, conservation and management of non-renewable natural resources and forestry resources in the province, including laws in relation to the rate of primary production therefrom;*
C. *Development, conservation and management of sites and facilities in the province for the generation and production of electrical energy*

Additionally, subsection 92A, 1 states that:

> *Each province, the legislature may make laws in relation to the export from the province to another part of Canada of the primary production from non-renewable natural resources and forestry resources in the province and the production from facilities in the province for the generation of electrical energy, but such laws may not authorize or provide for discrimination in prices or in supplies exported to another part of Canada.*

The province gained further authority in 1930, when the Natural Resources Transfer Agreement (*Constitution Act, 1930*) was established, under which the Government of Canada transferred ownership of public lands and resources in Alberta to the Province of Alberta.[20] The Government of Alberta accepted not only the constitutional mandate to manage public lands and natural resources in the province, but also Aboriginal use of public lands as provided for in the treaties and NRTA, including the rights to hunt, fish and trap on the public lands.[21] In practical terms, provincial laws apply generally throughout Alberta, unless they are in direct conflict with First Nation treaties.[22]

The actual management of Oil and Gas development in Alberta is conducted by the Alberta Energy and Utilities Board (EUB), which is an independent, quasi-judicial agency of the provincial government that established to ensure that the discovery, development, and delivery of Alberta's energy resources and utilities services takes place in a manner that is fair, responsible, and in the public interest.

By default, the Federal government has authority over issues related to inter-provincial and international transport and export, as well as development in offshore and frontier resources. Policy issues that arose as a result of the discovery and development of Canadian Oil and Gas Reserves in Western Canada; particularly relating to construction of new pipelines and the approval of long-term exports, prompted the federal government to recognize and define the scope of it responsibilities in these areas [23]. Consequently, in November 1959, it proclaimed the

National Energy Board Act, under which the National Energy Board (NEB) was created. The National Energy Board is responsible for:

- Construction and operation of inter-provincial and international oil and gas pipelines and power lines, including additions to existing pipeline systems under federal jurisdiction. This includes evaluation of economic, technical and financial feasibility, and the environmental and *socio-economic* impact of the project.
- Pipeline traffic, tolls and tariffs;
- Export and import of natural gas;
- Export of oil and electricity;
- Frontier oil and gas activities.

2.3 Aboriginal Rights in the Context of Oil and Gas Development in Alberta

Based on the preceding description of the Canadian legal and political context, there are clearly several critical factors which underpin the role of Aboriginals in the development of oil and gas reserves within Alberta, including:

- The provincial government has authority in the development of oil and gas reserves within Alberta, which is largely managed by the Alberta Energy and Utilities Board. The EUB outlines its requirements for public consultation in specific guides (Guide 56, 71, 60, 65, 28, etc).
- The Federal government has authority over energy projects involving
    - Inter provincial or international transport of natural gas and oil in pipeline;
    - Export of oil and natural gas.
- Development of energy projects impacts First Nations and other Aboriginals treaty rights to hunt and fish on public lands.
- The Crown has a fiduciary duty to consult where there is an infringement of an existing aboriginal or treaty right (as per the Sparrow Test).

With respect to royalty payments within the province, the Government of Alberta collects royalties on the all oil and gas production as representing the Crown's portion of the natural resource. However, the exception is on Reserve Lands, where the royalties are held in trust by the Federal Government for the Band whose land produced the oil or gas.

2.3.1 Aboriginal Consultation Obligations on Treaty Lands

Interpretation and implementation of the *fiduciary duty to consult* is currently driving Canadian policy issues related to Aboriginals and natural resource development. More specifically,

unresolved issues regarding Aboriginal rights and who and when there is a duty to consult is both the focal point of this paper and the "hot topic" in Alberta's Energy Industry.

Decisions made by courts define both the federal and provincial governments' obligations to consult with Aboriginal people.[24] Where consultation is required on land and resource issues relating to an infringement of an existing treaty, NRTA or other constitutional right, it is the Government of Alberta's role to consult affected Aboriginal people, not the role of industry.[25] The Crown may delegate procedural aspects of consultation to industry; however, the duty derives from the Honour of the Crown, which cannot be delegated.[26]

In the technical view of the law, the Alberta Government's position is that:[27]

- AB does not have fiduciary duty to Aboriginals;
- AB does not have duty to consult regarding resource development;
- AB is the one to consult, not industry.

Current practices follow the law and are being enhanced by policy development. Under policy, the Government has decided to consult with Aboriginals regarding natural resource development on Crown Lands where existing Aboriginal or treaty rights are impacted.[28] To this end, Alberta has engaged in developing Consultation Guidelines which is a policy expected to be passed by the Provincial Cabinet Legislature in the spring of 2005 and follows the intent of the original Aboriginal Policy Framework from 2000.[29] In recognition of the importance to First Nations of cultural sites, the Government of Alberta also requires developers to undertake historical resources impact and mitigation studies and encourages co-operative baseline studies of such sites on public lands.[30]

For perspective, Alberta had record Drilling activity in 2003 with 14,966 conventional oil and gas wells completed,[31] which does not even consider the associated roads, pipelines, or power

lines. Therefore, it is conceivable how employing the need to consult on every application would essentially shut down the development of Alberta's energy industry.

2.3.2 Aboriginal Consultation Obligations and Rights on Reserve Lands

As per the Federal *Indian Oil and Gas Act,* the Minister consults on a continuing basis the representative persons of the Indian bands most directly affected.[32] Any royalties obtained from Indian lands is subject to payment to Her Majesty in right of Canada, in trust for the Indian bands concerned.[33] Notably, companies negotiate directly with Aboriginals in order to gain access to Reserve lands as is necessary to explore or develop oil and gas reserves near or on reserve lands.

As per the *Indian Oil and Gas Regulations*, all provincial laws applicable to non-Indian lands that relate to the environment or to the exploration and production of oil and gas that are not in conflict with the Act or Regulations apply to wells and pipelines on reserve lands as well.[34]

3.0 Examples of Aboriginal Consultation by Industry in Practice

Raised stakeholder expectations, regulatory requirements and increased focus on corporate responsibility have prompted the petroleum industry to recognize a need for increased public involvement, which includes Aboriginal stakeholders. Consequently, companies have focused on providing stakeholders with the opportunity to participate in and possibly have increasing levels of influence over business activities that may affect them in order to:

- Establish or improve relations with residents and representatives of communities, interest groups, agencies and governments;
- Identify and understand stakeholders' interests, concerns and priorities in the planning stage of development
- Proactively communicate important issues to stakeholders in order to reduce opposition and the likelihood of costly delays, stoppages, litigation, or bad press;
- Establish a medium for working with stakeholders to resolve problems, make informed decisions, and reach a common goal;
- Support routine and streamlined license application process;
- Meet regulatory requirements for meaningful consultation with stakeholders;
- Maintain a license to operate; both regulators and markets penalize companies for poor social and environmental performance.

With respect to Aboriginals specifically, both judicial and regulatory bodies have increased requirements for Aboriginal involvement during the past decade. It is clearly recognized that failure to adequately engage and consult Aboriginal people will lead to intervention and thus jeopardize projects.

Government mandated Aboriginal consultation is largely prompted by the regulatory and approval process for new projects. However, since the Aboriginal community especially values the development of relationships, prior to any assessment they may carry out regarding a particular project; many companies have embarked on ongoing initiatives and efforts in order to cultivate a strong, long-term and mutually beneficial relationship.

The Canadian Association of Petroleum Producers (CAPP) has identified several methods for Energy Producers of engaging Aboriginal communities in consultation efforts. These include but are not limited to:[35]

- ***Workforce Development initiatives*** that support education, employment-related training and recruitment, retention and advancement. This may include supporting pre-employment and educational upgrading to improve pre-recruitment qualifications, internal and external mentoring programs that reach out to Aboriginal students in schools, scholarships and support for apprenticeship programs.

- ***Business development initiatives*** through providing business opportunities, equitable partnerships and joint ventures or strengthening business capabilities/capacity. Examples include employing Aboriginal suppliers.

- ***Community relations efforts*** to foster long-term relationships between industry and Aboriginal communities. Such efforts may include participation in community development initiatives and community investment.

- ***Collaborative resource management*** which includes collaborative and consultative processes between industry and Aboriginal communities. It may include environmental studies, ecological and wildlife studies, archeological studies, joint field studies and involvement of Elders in defining areas of traditional interest or activities.

- ***Demonstrating Corporate Commitment*** by building commitment into corporate policies, such as workforce diversity, cross cultural training programs, Aboriginal Relations policy, and benchmarking performance in Aboriginal relations. Aboriginal relations policies may outline the goals, objectives and outcomes that a company hopes to foster through the development of positive relationships with Aboriginal communities.

4.0 Key Issues and Opportunities

Uncertainty and changing expectations within the legal and regulatory institutions and stakeholder communities are the key challenges in Aboriginal consultation. More specifically, the key issues can be described as:

1. The legal framework governing Aboriginal engagement and public involvement is based on case law, which continues to develop with the processing of each legal dispute.

2. The federal, provincial and territorial governments each regulate case law and have specific, sometimes overlapping authority in the development of oil and gas reserves. Regulatory requirements are evolving and not always aligned or broadly accepted.

   For example the NEB issued a Memorandum of Guidance (MOG) with respect to Consultation with Aboriginal Peoples, which has since prompted considerable discussion between various levels of government and agencies, the Board, companies and Aboriginal representatives related to the practical implications of the directive contents. The NEB has subsequently further defined expectations regarding aboriginal consultation. Most provincial and territorial regulators are also undergoing various reviews regarding their own aboriginal consultation requirements.

3. Unresolved specific claims, including treaty land claims; resolution of the claims is a long and involved process and oftentimes the exact nature and locations of claims are considered confidential and are revealed to the public and/or petroleum development parties only at the discretion of the tribal council or the chief of the bands involved in the course of face-to-face consultations. Additionally, the crown will not make regulatory

decisions regarding disputed land, unless the project developer has negotiated a cooperation plan with relevant Aboriginal parties.Consequently, unresolved specific claims significantly complicate negotiations with Aboriginal communities.

4. Regulatory requirements represent the minimum guidelines with respect to adequate Aboriginal consultation and engagement. Based on the legal outcomes to date, the following legal requirements exist today:

   - Consultation must be meaningful and undertaken in good faith.
   - Proponents must provide sufficient information on the proposed project to enable Aboriginal communities to determine the effect of potential infringement on rights.
   - Communities must be given opportunity to express their views and concerns, and the regulator must give serious consideration to that concern.

5. Future developments in Aboriginal consultation are expected in the following areas:

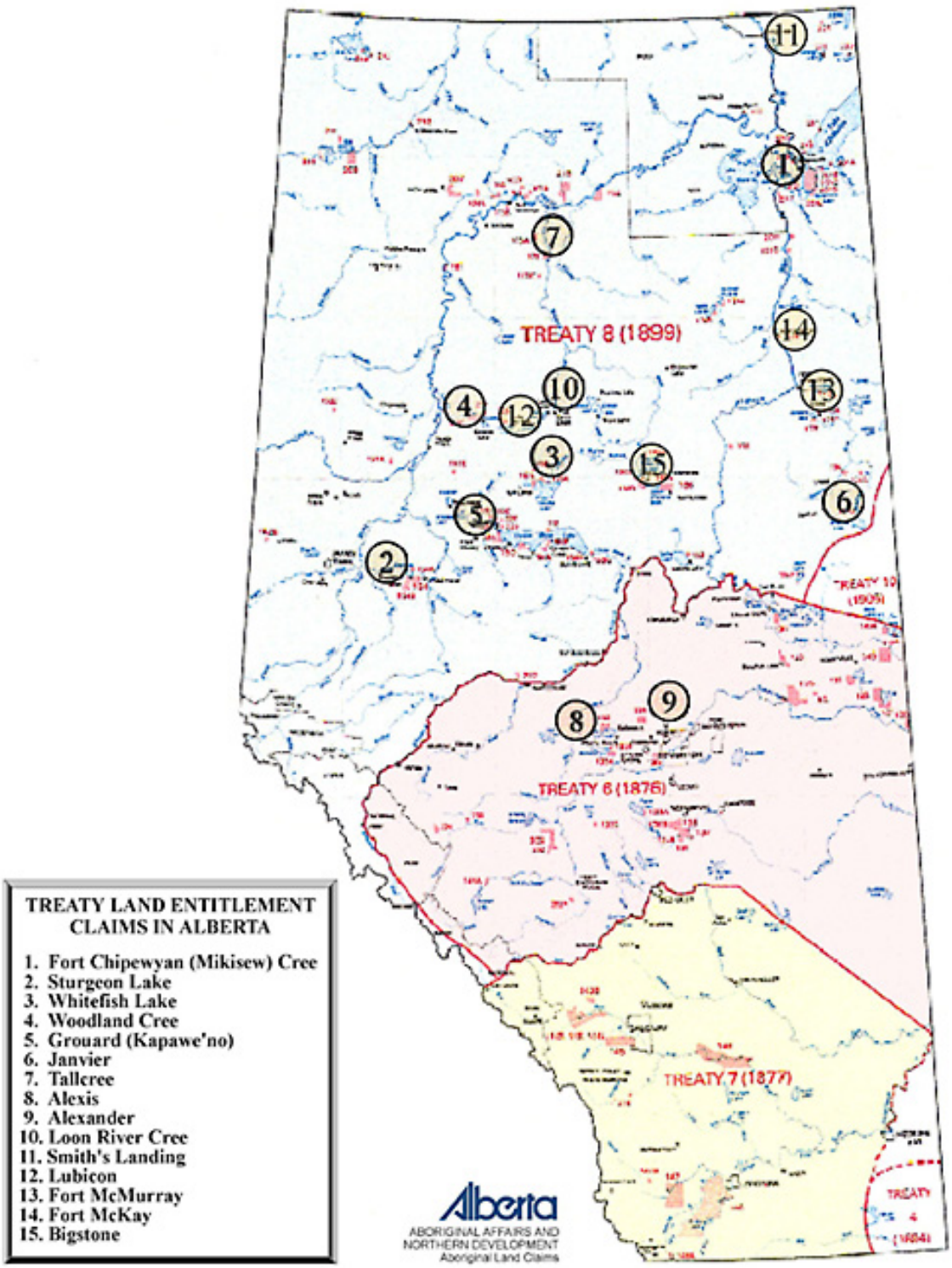
   - Increased financial funding to Aboriginals in order to support their efforts to participate in meaningful consultation; the federal department of Indian and Northern Affairs currently provides some funding for this purpose. However, Aboriginals do not consider the funding to be adequate given the complexity of the issues in question.
   - Self-government may lead to Aboriginals taxing oil and gas development on reserve lands.

5.0 Conclusions

Clearly, oil and gas development must take into account Aboriginal treaty, title and rights. Aboriginal involvement or consultation is the primary vehicle for understanding and reflecting Aboriginal rights in development projects. The legal and regulatory requirements governing consultation are continuously evolving based on new legal decisions and are considered the minimum requirements for meaningful engagement of Aboriginal peoples. In lieu of finalized legal procedures, it is advisable for industry to meet or exceed the currently accepted practices, in order to ensure timely development of their mineral rights holdings.

Appendix 1: Map of Canada

Appendix 2: Map of Numbered Treaty Settlements and Reserve Locations in Alberta



Appendix 3: Chronology of Treaty Land Claims in Alberta

Treaty Land Settlements within Alberta[36]

2000:
Settlement of the Smith's Landing treaty land entitlement claim under which the First Nation will receive 21,500 acres of land and $31,000,000. The Government of Alberta will provide 19,000 acres of provincial Crown land and $3,000,000; the Government of Canada will provide 2,500 acres of land and $28,000,000.

1999:
Settlement of the Loon River Cree treaty land entitlement claim under which the First Nation will receive 44,800 acres of land and $22,000,000. The Government of Alberta will contribute the land and $7,500,000; the Government of Canada, $14,500,000. In addition, over a period of five years, the Government of Canada is providing $29,500,000 for capital construction on the new reserves.

1998:
Settlement of the Alexander treaty land entitlement claim under which the First Nation will receive up to 15,140 acres of additional reserve and $10,000,000. The Government of Alberta will provide 5,140 acres of provincial Crown land and $3,000,000; the Government of Canada $7,000,000.

1995:
Settlement of the Alexis treaty land entitlement claim under which the First Nation will receive up to 23,000 acres of additional reserve and $12,000,000. The Government of Alberta will provide 20,824 acres of provincial Crown land and $2,000,000; the Government of Canada $10,000,000.

1993:
Settlement of the Tallcree treaty land entitlement claim under which the First Nation received 13,000 acres and $7,000,000. The Government of Alberta is providing the land and $1,500,000; the Government of Canada, $5,500,000.

1993:
Settlement of the Janvier treaty land entitlement claim under which the First Nation received 3,400 acres of land and $5,000,000. The Government of Alberta contributed the land and $1,800,000; the Government of Canada $3,200,000.

1992:
Settlement of the Grouard treaty land entitlement claim under which the First Nation received 2,600 acres of land and $3,005,688. The Government of Alberta contributed the land and $982,000; the Government of Canada, $2,023,688.

1991:
Settlement of the Woodland Cree land claim under which the First Nation received 35,200 acres of land and $19,512,000. The Government of Alberta contributed the land and $5,000,000; the Government of Canada, $14,512,000. In addition, over a period of five years, the Government of Canada is providing $35,200,000 for capital construction on the new reserves and the

Government of Alberta is funding a special training and employment program at a cost of $3,000,000.

1990:
Settlement of the Whitefish Lake treaty land entitlement claim under which the First Nation received 5,830 acres of land and $19,166,000. The Government of Alberta contributed the land and $10,833,000; the Government of Canada, $8,333,000.

1990:
Settlement of the Sturgeon Lake treaty land entitlement claim under which the First Nation received 16,207 acres of land and $5,575,000. The Government of Alberta contributed the land and $1,425,000; the Government of Canada, $4,150,000.

1986:
Settlement of the Fort Chipewyan (Mikisew) Cree treaty land entitlement claim under which the First Nation received 12,280 acres of land and $26,600,000. The Government of Alberta contributed the land and $17,600,000; the Government of Canada, $9,000,000.

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