

Affidavit #1 of Marvin L'Hommecourt  
Sworn January 30<sup>th</sup>, 2009  
Action No. 0803 17419  
Edmonton Registry

**IN THE COURT OF QUEEN'S BENCH OF ALBERTA  
JUDICIAL DISTRICT OF EDMONTON**

BETWEEN:

ATHABASCA CHIPEWYAN FIRST NATION

*Applicant*

-and-

MINISTER OF ENERGY, CANADIAN COASTAL RESOURCES LTD.,  
STANDARD LAND COMPANY INC., and SHELL CANADA LTD.

*Respondents*

**AFFIDAVIT #1 OF MARVIN L'HOMMECOURT**

I, Marvin Bert L'Hommecourt, heavy equipment operator, of 2 Bruyer Crescent, Cold Lake, Alberta, SOLEMNLY AFFIRM AND DECLARE THAT:

**Personal History**

1. I am a member of the Athabasca Chipewyan First Nation ("ACFN") and have lived, hunted, trapped, fished and gathered in the area around Chipewyan Indian Reserve 201G ("Poplar Point Reserve"), and as such I have personal knowledge of the facts and matters hereinafter deposed to except where otherwise stated to be based upon information and belief, in which case, I verily believe the facts and matters to be true.

2. I was born at Poplar Point Reserve in July 13, 1954. I was raised at Poplar Point. I went to residential school in Fort Chipewyan. I went to high school in Saint Paul, Alberta. As an adult I lived in Calgary for about 20 years, and Fort McMurray and Fort McKay for about 15 years. I moved to Cold Lake a year and a half ago. I am a registered "Indian" under the *Indian Act*.

### **Family and Community Life in Poplar Point Area**

3. My father's name was Norbert L'Hommecourt. My dad was 75 or so when he passed away about 12 or 15 years ago. His father was Moise L'Hommecourt. My grandfather was quite old when he passed away, probably in his 80s. He passed away around 1968 or 1969. I never met my father's mother. They were all members of ACFN.
4. My grandfather, Moise L'Hommecourt, told me that he used to go trapping up in the barrens in the Northwest Territories, and then trap all the way down to the Poplar Point area again. He was free to go wherever he wanted then. This was around the time of Treaty. He told me about hunting caribou. He told me that his family, his brothers and relatives, trapped all the way down the east side of the Athabasca River, all the way from Fort Chipewyan to Fort McMurray to sell furs. That was way before I was born. His family were all ACFN people. He told me stories about growing up around Poplar Point. That was the most southern place that he lived. He liked it there.
5. My mom, Annie L'Hommecourt, was 80 when she passed away about six months ago. Her parents were Moise and Philamina Boucher. Her mother was from further south, and her father was from Fort McKay First Nation. My mother was originally a member of Fort McKay First Nation. She switched to ACFN when she married my dad. After my dad died, she switched back to Fort McKay First Nation.

6. I was born and raised at Poplar Point Reserve with my mother, father, seven sisters, my older brother Roy, and my dad's father, Moise L'Hommecourt. Attached hereto as **Exhibit "A"** is a map of part of the Athabasca River and Poplar Point Reserve (the "Map"). My mom's brothers lived on the other side of the Athabasca River. Their names were Raymond, Willy, Ted and Henry Boucher. They were from Fort McKay First Nation. My mom's father, Moise Boucher, lived with my uncles.
7. I was close to both sides of the family. My mom's brothers, they used to tease me and throw me in the snow. They taught me quite a bit. They took me all over the place with them when I was a child and teenager.
8. Poplar Point is part of ACFN's Traditional Territory. It was an ACFN community. Everyone at Poplar Point spoke Dene. Prior to going to residential school, I didn't speak a word of English. When I came out, I didn't speak a word of Dene. That's all my parents spoke though, so I still understand it.
9. My dad built a cabin at Poplar Point Reserve when I was a child, which I marked with a "△" on the Map. He got the trees from across with river, and the dogs pulled them over. They dragged the trees right up the river bank. We had a warehouse, too, where we kept our traps, snowshoes, all our hunting and trapping gear. It smelt like dog harnesses. We had a potato garden and a cellar where we kept our vegetables. We hung our dried meat in big canvas bags in the house.
10. There were half a dozen cabins on Poplar Point Reserve, and about the same number on the other side of the Athabasca River, where my mother's brothers lived. I marked the area where my mother's brothers had their cabins with a "△" on the Map. There were other families that lived at Poplar Point and around there. The Cypriens lived at Point Brule, which is just north of Poplar Point. There were Piches that lived at both Poplar Point and Point Brule. The Cypriens and the Piches are ACFN families.

11. There are graveyards on both sides of Poplar Point, which I marked with “#” symbols on the Map. My dad told me that lots of people from Poplar Point died during a flu epidemic when he was young, sometime around the 1930s. Seven of his brothers died in the epidemic and are buried there. My father is buried there, too. He passed away 12 or 15 years ago.
12. Poplar Point is half way between Fort McKay and Fort Chipewyan. There were a lot of dances there when I was young. ACFN people, and other relatives, would come from all around because Poplar Point is a central meeting place. They would stop when they were traveling up and down the Athabasca River.
13. I remember that when I was young, in the winter, I would wake up in the morning and go sliding down the river banks in my long johns. My uncles would tease me about it. I had a few dogs and I would hitch them up for a ride. Then I'd go check the rabbit snares. I went hunting for chickens and squirrels with a sling shot. Everyday I had to haul water and chop wood. There was always lots of work to do.

### **Traditional Hunting, Trapping, Fishing and Gathering Around Poplar Point**

14. Our cabin at Poplar Point Reserve was our home base. My parents and grandfathers travelled out from there for hunting, trapping, gathering and fishing. We would go for days or months at a time. We had regular campsites that we used. There were trails that ran directly to from Poplar Point Reserve to our campsites. I remember traveling by dog team in the winter. We traveled by boat on the river, when it wasn't frozen. Otherwise we walked. We took the dogs and put packs on their backs. I would go with my parents, uncles or one of my grandfathers, until I went to the residential school when I was about 7 years old. All my siblings and I went to residential school in Fort Chipewyan. When I was out of residential school for the summer, I would go to Poplar Point to hunt around all summer long.

15. I remember going with my family across to the Birch Mountains with three or four dog teams and hunting and trapping as we went. I marked this area with red dashed lines and an "E" on the Map. This is an important area for my family. This is the area where I have lived throughout my life. I, and my family, went there all year-round. My dad's father, Moise L'Hommecourt, showed me that area. We had a cabin out there too, which I marked with a "△" symbol. It was on a ridge, built into the hill. My grandfather, Moise L'Hommecourt, built the cabin when he was young. He went to that area to hunt and trap. We hunted *deneee* there, which is moose in Dene, and *edsheere*, which is buffalo in Dene. We shot beaver there in the spring, fall and winter. We got squirrels there, too. We got hundreds of squirrels. My grandfather, Moise L'Hommecourt, would gather plants and medicine in this area, and I went with him. We went to Diana Lake for canoeing and fishing, which I marked with an "F" on the Map. There's good fishing in that area. I marked with blue dashed lines the area where we went fishing. We set nets for whitefish and lake trout in those lakes. We fished at Ronald Lake. In Dene it's called *Tucho*, meaning Big Lake. Other ACFN families hunted and trapped in this area too. Both my parents' families would go there. I remember going there with my mom's brothers.

16. I still go to the places my grandfather showed me to hunt, trap and gather, in the area I marked with red dashed lines and an "E" on the Map. When I lived in Fort McKay and Fort McMurray, I went every day off for the entire summer, while I was working six days on, six days off. I was there last summer. I hunt moose and buffalo there. There's a buffalo herd back there. I took a buffalo a couple of years ago. I snare rabbits. It's a good year for rabbit fur this year.

17. Another area where I hunted, and still hunt, was the Firebag area, which I marked with red dashed lines and a "G". I hunted moose and bear there with my cousins, John Flett and the other Fletts from ACFN, back when we were teenagers. We fished with rod and reel down there too, when we went hunting. We caught pickerel, grayling and jackfish.

18. I still go to Firebag, the area I marked with a "G" on the Map, for moose hunting. I still gather plants in this area as well, while I'm hunting. I go fishing there too, at the mouth of Firebag River, in the area I marked with a blue circle and an "H". There's been a decrease in the amount of fish and moose, since I was young. Sometimes there are half a dozen boats at the mouth of the river, with non-First Nations people fishing. I just fish for fun now, not for food. The fish don't taste as good anymore. I wouldn't give away the fish that I get out of Firebag. I wouldn't want to poison anyone.
19. We went with my dad, up and down the Athabasca River from Fort McMurray to Fort Chipewyan. He'd hunt on the banks of the Athabasca River. He'd kill a moose and that was where we'd camp for a couple of weeks. I still use the Athabasca River for hunting. I have a favourite moose hunting spot on the way to Poplar Point Reserve, which I marked with a red line and a "D" on the Map. I also stop at Clausen's Landing on the way and camp. I like it there. I go for maybe a two hour walk in all kinds of directions and hunt. I marked this area with red lines and an "I" on the Map. My auntie Mary, from Fort McKay, has a cabin just south of there, across from Bitumount, that I marked with a cabin symbol "△" on the Map. We used to fish in the Athabasca River on these trips. I don't fish out of the Athabasca River anymore. There's foam on the river on the sides, stuff floating in there, debris, garbage. I don't eat the fish out of the Athabasca River, because of the pollution.
20. My parents moved from Poplar Point Reserve in the late 1960s. For awhile they lived in Fort McMurray in the summer. They traveled around, following the work, but they would always go back to Poplar Point to trap in the winter, to the area that I marked with red dashed lines and an "E" on the Map. They went back to Poplar Point whenever they could.

## **Current Community Life at Poplar Point Reserve**

21. I still go back to Poplar Point whenever I can. As soon as the ice breaks, I head off for Poplar Point. I go there spring, summer and fall. I have never missed a summer in my life.
22. I travel there by boat, although I have to be careful now, because the water on the Athabasca River is much lower now. People get stuck in their boats all along the river. I have to stop and help pull people off the sand bars all summer long.
23. I have three children. My son is 30, my daughter is about 28, and my little guy is 16. I took them out to Poplar Point and to my trapline when they were growing up. I took both my sons out hunting at Poplar Point last summer. I taught all my kids how to hunt and how to prepare the meat. Shooting is the easy part. Then you have to skin it and make the dry meat. I've taught them how to prepare the traditional foods in the traditional way. I taught them all the basics, like how to make fire and set rabbit snares. When we travel by boat up the Athabasca River from Fort McKay or Fort McMurray to Poplar Point Reserve, I keep an eye out for good areas for rabbits. If I see one, we'll stop and camp for a couple of nights on the river banks and set the snares.
24. I taught my kids how to survive, so that if they want to go back into the woods, they would know how to live. Those skills, that knowledge, the ability to survive is our culture itself. That instinct to survive is our culture, and we're losing it. It is part of what it means to be an ACFN person. That's why it is important that they go to Poplar Point to learn and practice those things. It's their culture. My son is very interested in learning it. I can't wait until spring for the breakup on the Athabasca River to take him to Poplar Point.
25. There are ACFN people that have homes at Poplar Point Reserve today. Paul Cyprien is there, and so are Mary Deranger and her husband Ron McNeil. You can still see the old cabins that were there when I was young, although they've fallen down now. One of the

old cabins is still there. Travellers, mostly ACFN people, stop and use it, because Poplar Point is halfway between Fort McKay and Fort Chipewyan. We keep it stocked for that reason.

26. My nephew Mark L'Hommecourt is living out at Poplar Point Reserve. He started going out there two years ago. This is his first winter. He's been there since summer. He grew up in the city. I help him out. I gave him my quad and skidoo. I go there and teach him. I taught him how to skin moose. He killed his first moose late last fall and I taught him how to quarter it, skin it, and to see what the good parts to eat. I talk to Mark every couple of days. He calls me to complain and to ask me questions about how to live out there and how to do things. Since he's been there, I took him out once to show him the same places that my grandfather showed to me. I'm going to take him out more.
27. When I'm out around Poplar Point, I see other ACFN members, like John Flett, Edward Flett and Joe Flett, and their families. I see them out on the river, going from Fort Chipewyan and back.
28. We still gather at Poplar Point Reserve as a family. I go out there to go camping with my sisters a couple times each summer and a couple times each early fall. My sisters hang around Poplar Point Reserve with their kids, and I go hunting with my brothers-in-law. It's a family event. My mom liked going there, right to the end. My sisters go berry picking along the Athabasca River. We'd get the moose and my sisters prepare the meat. I marked an area with red dashed lines and a "J" on the Map, because it is a good place for moose hunting.
29. Mark and I built an arbour there, so that we can hold gatherings and meetings. I just got married there on August 23, 2008. We had a traditional wedding. There were about 40 people there, mostly family. We are starting an annual gathering that's going to happen every spring at Poplar Point Reserve. We're going to talk about how to keep all the development south of Poplar Point, way south. Our meeting will be done in the old way, when people gather around the fire and discuss the direction of the band, without all this



minute taking. We're inviting people by word of mouth, the way we used to. Hopefully it's the start of discussions about what we want to do to keep the hunting territory alive with life! So that instead of going 40 miles to get a moose, you only go two.

30. My family is rebuilding Poplar Point Reserve, so that we have a place to get away from it all. When I retire, I want to go back there more often. I plan to build a house there. I'll go all summer, and I'll get all my food and water off the land.

### **Personal, Family and Community Need for Traditional Foods**

31. I was raised on wild foods, and I have a craving for them. I don't like hamburgers. Wild foods are part of my culture, and my spirituality. People in the south go to pow wows. They drum and sweat, and that's spiritual. In my culture, we go hunting. I eat what I kill and live off it, that's the spirituality.

32. I share all the traditional foods that I harvest with my family. Traditional foods supplement my diet. It helps financially because groceries are expensive. It's the same thing for my sisters. It helps with their grocery bills. They don't hunt, so I share with them. They need it, especially if they're not working. My nephew Mark isn't working right now, because he's living at Poplar Point Reserve, so he needs to get moose.

33. Some of my friends, ACFN members that live in Fort Chipewyan, they have to go out moose hunting and fishing because groceries are so expensive there. I bring them fish, because they're scared of the fish in Lake Athabasca. No one eats the fish out of there anymore.

## **Traditional Hunting, Trapping and Gathering at My Trapline**

34. I marked the area of my trapline with red lines and an "A" on the Map. It was my mother's trapline first. She had it for about 30 years ago. I took it over about 12 or 15 years ago. We have two cabins there, which I marked with cabin symbols, "△", on the Map. The one on the left is my mother's cabin, and the one on the right is mine. I have a sweat lodge near my cabin. My sister Jean's husband comes to use the sweat lodge.
35. Every fall I had to go and get everything ready for trapping season. I had to go out and clear the trails. I fixed up the lynx houses, made of branches, so that they were ready for me to put the snares inside. We'd start going to trap in early winter until about March. My mother and I used to trap fisher, marten, beaver, lynx and otter.
36. We used the cabins and the lands at the trapline all year-round. When my mother was alive, we always went to the trapline together. Sometimes my sisters came with us with their kids and husbands. My sisters were all born ACFN, but some switched over to Fort McKay First Nation when my mom did.
37. Sometimes we would stay at the trapline for a couple of weeks at a time, but at minimum, not a week went by without me going there, if I was in town. The last eight years that I lived in Fort McMurray, I would work six days on, six days off. I always spent my six days off in the bush. Before that job, I went whenever I could. Even when I lived in Calgary I'd be back for a good week or so every summer.
38. I hunted moose there, and when my brother-in-laws came to the trapline, we'd hunt moose together. There used to be lots of moose around my trapline in the winter. The moose used run across from the Birch Mountains, travel down through the willow stands on the west side of the Athabasca River, and winter around my trapline. I marked this migration route and area with brown dashed lines and a "B" on the Map.

39. In the spring we shot beaver when the creeks break up and the ponds open up. We also shot beaver before the ice comes on.
40. There used to be more caribou that migrated south and east of my trapline. When I was in my early 20s, I got maybe two or three of them. Right after that, someone told me I couldn't hunt them, so I stopped. They still migrate down, but I don't see much sign of them. The last one that I saw was three or four years ago.
41. I used to take my mom and go to the blueberry patches in September. We'd set up the tent in the patches and fill up buckets for a few days. We did the same at the cranberry patches in October. My mom made jam with them. She gave it all away. I'd go hunting for moose and she'd give it all away. I marked our berry picking areas in orange dashed lines on the Map. I still use those berry picking sites.

### **Development and Industry on My Trapline**

42. Back when I started going with to the trapline with my mom, there was just a little trail. We'd walk in or go in the jeep. Now there's a paved, two-lane highway, just like Highway 63.
43. Syncrude, Shell, Albion Sands, Husky, Suncor, Imperial Oil and Exxon Mobil all have projects there. There's an airport right on the border of my trapline. There's been forestry activity and road building. There are cut lines and drilling all over. You can't swing a frozen rabbit without hitting them.
44. Every fall the oil sands people come over with their maps and say they're going to drill here and there. I've got hundreds of maps. I think about telling them that they can't, but they tell me that all they have to do is inform me about their activity. I never felt like I

had a choice to say no. They were coming in and saying, "This is what we're going to do, here's the money."

45. There are almost no animals on my trapline now, ever since they opened the road 10 or 15 years ago. I haven't even seen a *gleee* there, which is squirrel in Dene. Everyone and their grandma are on my trapline now though. There are camps all over the place.
46. Same with the moose, when they opened up the road and cleared all the brush, the moose changed their migration route. Some moose, the stubborn ones, still winter around my trapline, but most have moved north and have a new migration route that I marked with brown dashed lines and a "C" on the Map. I now go to the Firebag River area to hunt moose, which I marked with red dashed lines and a "G" on the Map.
47. They drained the creeks and ponds. I used to camp there, and now there's nothing there. And it's been cleared anyway.
48. Imperial Oil put up a security gate, with a guard, and sign that say "No Hunting" right by my cabin. I have to give the guard my name and he writes down my licence plate, in order to pass. He knows me now. I have to go through there to get to my cabin. I can't bring my guns through the security gates, so I can't take my guns to my cabin.
49. There's a big camp with 500 men across the creek from my cabin. When I go to my cabin they're all rubbernecking, staring and watching me. It bothers me to no end. They come in on school buses to go to work. The camps are dry, so they go to my cabin to party and they wreck it. They wrecked my mom's cabin.
50. It's not safe on my trapline, because there are too many people out hunting. It seems like there are non-First Nations people in every cutline hunting moose. That's partially why there's less moose, there's more competition.
51. Every time I go there I get discouraged. I still take my friends and family to pick berries, but we wouldn't set up camp like we used to, we just pick a gallon or so and leave.

52. I'm angry. I want to protect my trapline.

### **Importance of Traditional Lands Around Poplar Point**

53. The oil companies are coming north, so the animals have to keep moving north. I used to have places I liked to camp, I went there for years. Now I hear the boom of the propane barrels, the pile drivers and the machinery. It carries across the land and it scares the ducks away. Industry gets closer and closer, and I move farther and farther away, like an animal.

54. My concerns about development on the traditional lands are that they are going to chase all the game away and cut the trees down, just like in my trapline. I know what happened in my trapline, and that's what will happen over around Poplar Point if they develop. There will be more people there, I won't be able to go there and be by myself or with my family. There will be more disturbance, and more garbage.

55. If the Poplar Point area was developed, it would be a cultural loss. I wouldn't want to go there and do my cultural practices, like hunting. It is very important to me to be able to hunt in that area. If I don't do it, I'll go crazy. It's good to be on the land, that's where the spirit is. If industry digs a big hole in the ground, they'll destroy the spirit of the land. If you go out and see beer cans, people that don't respect the way of the land, it's depressing. They destroy the spirit of the land, and then I won't want to go there. But I have to go there anyway, because it's part of me, part of my heritage.

56. If the oil companies destroy that land, then I can't eat the geese, duck, moose, or buffalo. I like to go out there and survive. It's part of my spirituality. The areas around Poplar Point have special spiritual significance to me. I want to protect the inland lakes, like



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IN THE COURT OF QUEENS BENCH  
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Applicant

- and -

**MINISTER OF ENERGY, CANADIAN  
COASTAL RESOURCES LTD.  
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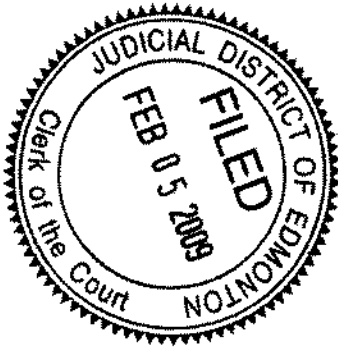
**AFFIDAVIT #1 OF  
MARVIN L'HOMMECOURT**

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MILLER THOMSON LLP  
816 - 1175 Douglas Street  
Victoria, BC V8W 2E1

Attn: Robert J.M. Janes/Robert C. Freedman  
Tel: 250-405-3460  
Fax: 250-381-8567

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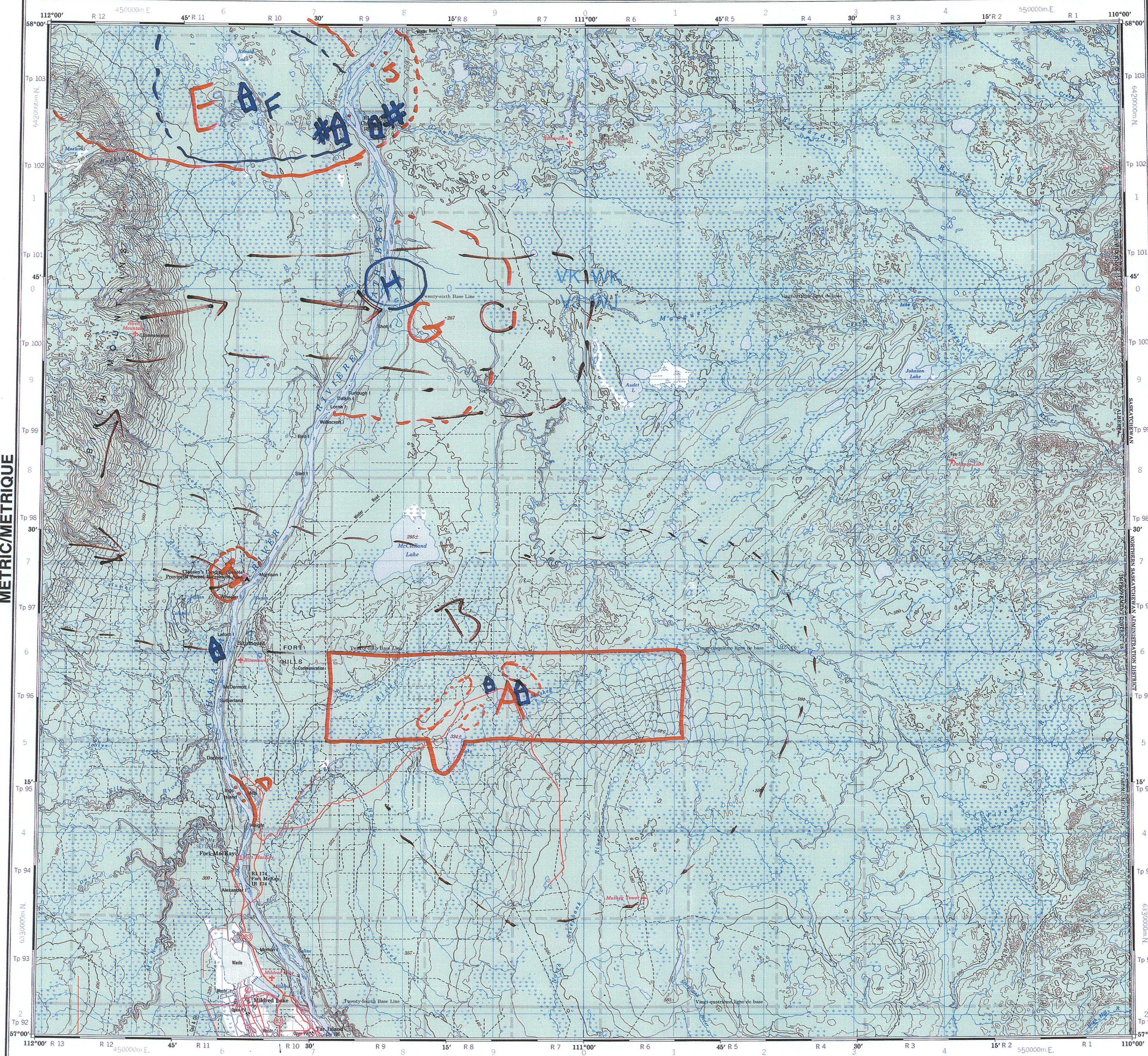
Military users, refer to this map as: **SERIES A 502 SÉRIE MAP 74 E CARTE**  
 Références de cette carte: **EDITION 3 MCE ÉDITION**  
 pour usage militaire.

This is Exhibit "A" referred to in the affidavit of Marvin L'Homme court sworn before me at Fort McMurray, Alberta this 30<sup>th</sup> day of January, 2009  
J. Baker  
 A Commissioner for taking Affidavits  
 Within British Columbia  
 Notary public

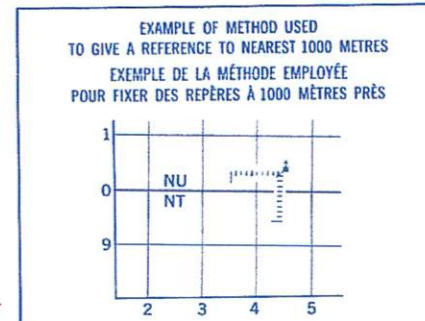
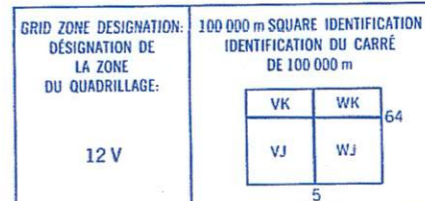
LEIGH ANNE BAKER  
 WOODWARD & COMPANY  
 Barristers & Solicitors  
 2nd Floor - 844 Courtney Street  
 Victoria, BC V8W 1C4

METRIC/MÉTRIQUE

METRIC/MÉTRIQUE



TEN THOUSAND METRE  
 UNIVERSAL TRANSVERSE MERCATOR GRID  
 ZONE 12  
 QUADRILLAGE UNIVERSEL TRANSVERSE DE MERCATOR  
 DE DIX MILLE MÈTRES



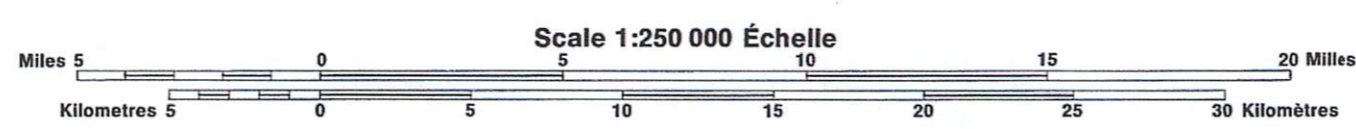
REFERENCE POINT CHURCH - EGLISE (as above) (ci-dessus)  
 POINT DE REPÈRE  
 SQUARE: Read letters of 100 000m square  
 CARRÉ: Lire les lettres du carré de 100 000m  
 EASTING: Read number on grid line immediately to left of point.  
 ASCISSE: Lire le chiffre de la ligne de quadrillage immédiatement à gauche du repère.  
 Estimate tenths of a square from this line eastward to point.  
 Estimer le nombre de dixièmes du carré entre cette ligne et le repère en direction est.  
 NORTHING: Read number on grid line immediately below point.  
 ORDONNÉE: Lire le chiffre de la ligne de quadrillage immédiatement en dessous du repère.  
 Estimate tenths of a square from this line northward to point.  
 Estimer le nombre de dixièmes du carré entre cette ligne et le repère en direction nord.  
 GRID REFERENCE: NU4504  
 RÉFÉRENCE AU QUADRILLAGE: NU4504  
 If reporting beyond 18° in any direction, prefix Grid Zone designation as: 14VNU4504  
 Si vous faites connaître votre position à quelque un qui se trouve à plus de 18°, pour importer la direction, indiquez également la zone de quadrillage tel que: 14VNU4504

|      |      |      |
|------|------|------|
| 1978 | 1980 | 1978 |
| 1974 |      | 1975 |
|      |      | 1978 |

PRODUCED BY THE CANADA CENTRE FOR MAPPING, DEPARTMENT OF ENERGY, MINES AND RESOURCES. DERIVED FROM 1:50 000 MAPS. INFORMATION CURRENT AS SHOWN IN DIAGRAM. PUBLISHED 1983.  
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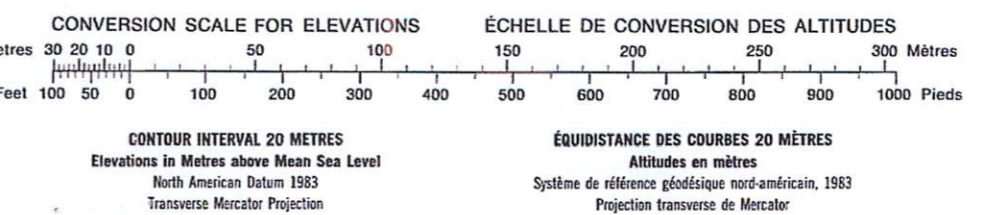
Information concerning bench marks and horizontal survey monuments can be obtained from Geodetic Survey, Canada Centre for Surveying, Ottawa.

**BITUMOUNT**  
 ALBERTA SASKATCHEWAN



Pour tout renseignement concernant les repères de nivellement et les bornes géodésiques, prière de s'adresser à la Division des levés géodésiques, Centre canadien des levés, Ottawa.

ÉTABLI PAR LE CENTRE CANADIEN DE CARTOGRAPHIE, MINISTÈRE DE L'ÉNERGIE, DES MINES ET DES RESSOURCES. TITRE DE CARTES À 1:50 000. RENSEIGNEMENTS À JOUR TELS QU'INDIQUÉS DANS LE DIAGRAMME. PUBLIÉE EN 1983.  
 © 1993, SA MAJESTÉ LA REINE DU CHEF DU CANADA, MINISTÈRE DE L'ÉNERGIE, DES MINES ET DES RESSOURCES.



Updated for features visible on 1991 satellite imagery. Mise à jour pour illustrer les éléments cartographiques visibles sur les images satellites de 1991.

FOR COMPLETE REFERENCE SEE REVERSE SIDE POUR UNE LISTE COMPLÈTE DES SIGNES, VOIR AU VERSO

Magnetic declination 1993 varies from 21° 12' easterly at centre of sheet to 17° 45' easterly at centre of east edge. Mean annual change decreasing 12.2'.  
 En 1993, la déclinaison magnétique varie de 21° 12' vers l'est au centre de la feuille jusqu'à 17° 45' vers l'est au centre de l'extrémité est. La variation annuelle moyenne décroît de 12,2'.

