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May 11, 2011

Gwich'in Land and Water Board  
P.O. Box 2018  
Inuvik, Northwest Territories  
Canada X0E 0T0

To Whom It May Concern:

**RE: Application G11Q001**

Indian and Northern Affairs Canada (INAC) appreciates the opportunity to review the application for a Land Use Permit (LUP) made by Bob's Welding Ltd. It should be noted that some of my comments refer to Bob's Welding Ltd's. old LUP conditions and some of the issues that we have encountered over the duration of their last permit. With that, I offer the below comments.

As the Crown is the land owner of this specific site, it is important to recognize that a Management Plan has been drafted and is currently being reviewed and is very near to completion. This management plan outlines phases of how INAC plans on developing this quarry site as well as other factors.

Condition 1.1, 1.3 and 1.9 of Bob's Welding Ltd's expired LUP states:

**1.0 26 (1) (a) – LOCATION AND AREA**

1.1 The Permittee shall not conduct this land use operation on any lands not designated in the accepted application, unless otherwise authorized in writing by the Board. **PLANS USED**

I recommend wording in this condition that directs the Permittee to conform to any management plan that may be developed for this site.

1.3 The Permittee shall only stockpile in areas designated by a Land Use Inspector

I recommend that the above condition be removed as there is a different condition that INAC proposes to use in the recommendation part of this letter to better manage this source.

1.9 The Permittee shall locate all camps on gravel, sand or other durable land.

I recommend removal of this condition as INAC would prefer that no camps be on site as this is a multi-user site and camps may occupy valuable space in the quarry if there are multiple users on site at one time. This could be addressed by giving the inspector the option to give written permission for camps to be set up during "quiet" times.

I would also recommend that the following conditions be added to the new LUP in addition to the previous conditions on the old LUP. These additional conditions would give INAC more tools to manage this site as well as ensure compliance.

1.6	The Permittee shall only excavate and stockpile in areas Designated in the accepted application, unless otherwise Authorized in writing by a Land Use Inspector.	LOCATION OF QUARRY OPERATION
1.10	The Permittee shall not construct parallel lines or roads, unless otherwise authorized in writing by a Land Use Inspector.	PARALLEL ROADS
3.2	The Permittee shall ensure a garbage container is on site.	GARBAGE
9.1	The Permittee shall dispose of all sewage and grey water as proposed in the accepted application, or in a manner as directed by a Land Use Inspector.	SEWAGE DISPOSAL
9.9	The Permittee shall remove all non-combustible garbage and debris, including plastics, from the area of this land use operation as specified in the accepted application, or as authorized in writing by a Land Use Inspector.	REMOVE GARBAGE
11.1	The Permittee shall not establish any camps or store equipment or supplies in the (insert location).	NO CAMPS/ STORAGE
12.3	The Permittee shall be responsible for all costs to remediate the land used in this Land Use Permit.	REMEDIATION COSTS
13.14	The Permittee shall examine all fuel storage containers for leaks a minimum of once a day; and shall repair all leaks immediately.	CHECK FOR LEAKS
14.1	The Permittee shall dispose of all debris and brush prior to removal of men or equipment from the land use area.	BRUSH DISPOSAL

17.9 Subject to section 29 (1) of the Mackenzie Valley Resource Management Act, the Permittee shall, within sixty (60) days after the completion of this land use operation or the expiration of this Land Use Permit, whichever occurs first, submit a final plan in duplicate to the Board and, where the land use operation was carried out on private lands, to the landowner thereof, showing: FINAL PLAN

(a) the lands on which the land use operation was conducted;  
and

(b) the location of

(i) lines, trails, rights-of-way and cleared areas that were used by the Permittee during the land use operation, specifying those that were cleared by the Permittee and those that existed before the operation began; and

(ii) buildings, structures, campsites, air landing strips, air navigation aids, fuel and supply storage sites, waste disposal sites, excavations and other works and places that were constructed or used by the Permittee in the land use operation; and

(iii) bridges, dams, ditches, railroads, roads, transmission lines, pipelines, survey lines, monuments, air landing strips, watercourses, traplines and cabins and all other features or works that were affected by the land use operation; and

(c) calculations of the area of the lands used in the land use operation.

Again, INAC would like to thank you for the opportunity to comment on this application. If you have any questions or concerns please contact me at the number below.

Respectfully yours,



Don Arey  
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**Canada**