

Environmental Protection Operations Directorate (EPOD)  
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October 26, 2015

EC file: 5100 000 017  
MV2015L2-0003

Jen Potten  
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Via email: [jpotten@mvlwb.com](mailto:jpotten@mvlwb.com)

Attention: Ms. Potten

**RE: MV2015L2-0003 - North American Tungsten Corporation Ltd. - Cantung Mine – Draft Type A Water Licence Renewal**

Environment Canada (EC) has reviewed North American Tungsten Corporation Ltd.'s (NATCL) responses to reviewer comments regarding Draft Type A Water Licence MV2015L2-003 to renew Water Licence MV2002L2-0019 as prepared by the Mackenzie Valley Land and Water Board (MVLWB) and provides the following closing comments for your consideration.

EC's specialist advice is provided pursuant to the *Canadian Environmental Protection Act, 1999*, the pollution prevention provisions of the *Fisheries Act*, the *Migratory Birds Convention Act, 1994*, and the *Species at Risk Act*.

## **Part A: 2. Definitions**

***EC#5 Comment: Broaden the definition of "Seepage" (pg. 6) to include structures that are not engineered, such as waste rock piles.***

***NATCL#6 Response: The water from the non-engineered structures is referred to as 'drainage' in the WL. Keeping the separation between engineered and non-engineered, seepage vs. drainage, will be important for development and understanding in management plans and reporting.***

***NATCL#7 Response: Suggest adding a definition for "Runoff" – the water collected and moved in ditches to tributary streams or the Flat River, not impacted by Project activities. This is an important distinction for the water management and hydrology plans and the subsequent reporting requirements. "Runoff" is used in the reporting requirements section, without a definition this requirement is ambiguous.***

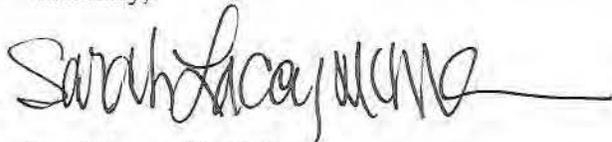
In regards to NATCL's #6 response, Environment Canada recommends that the definition of *seepage* include water coming out of non-engineered structure such as waste rock piles, etc. given that the *Metal Mining Effluent Regulations* (MMER) includes *seepage* as part of definition of effluent. Referring to water coming out of non-engineered structures such as waste rock pile as *drainage* may create some confusion whether that water is captured under the definition of effluent and by extension, MMER or not.

Similarly, with respect to NATCL's #7 response, Environment Canada recommends that "runoff" not be separately defined, given that "effluent" as defined under the MMER (below) includes surface drainage (whereby runoff is generally regarded as water that flows overland from higher ground to low land areas). Therefore, if the Board were to accept NATCL's suggestion of including the definition for runoff within the WL, there may be some confusion as to whether or not it is captured under the definition of effluent under the MMER.

*MMER "effluent" means an effluent — hydrometallurgical facility effluent, milling facility effluent, mine water effluent, tailings impoundment area effluent, treatment pond effluent, seepage and surface drainage, treatment facility effluent other than effluent from a sewage treatment facility — that contains a deleterious substance. (effluent)*

Should you require further information, please do not hesitate to contact Ms. Lisa Lowman at 204-984-0668 or via email at [lisa.lowman@ec.gc.ca](mailto:lisa.lowman@ec.gc.ca).

Sincerely,



Sarah-Lacey McMillan  
A/Head EA North

Cc: Lisa Lowman (Senior EA Coordinator, Environmental Assessment – EA South, EC)  
EC Internal Distribution