



# Waste Management Plan

**PROJECT ID:** Gordon Lake Group Remediation Project

**DATE OF SUBMISSION:** August 4, 2016

**SUBMITTED BY:** Carey Ogilvie – Indigenous and Northern Affairs Canada (INAC)

**SUBMITTED TO:** Mackenzie Valley Land and Water Board



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# 1 Introduction

Indigenous and Northern Affairs Canada (INAC; formerly Aboriginal Affairs and Northern Development Canada (AANDC)) – Contaminants and Remediation Directorate (CARD), through the Northern Contaminated Sites Program (CSP) has developed the Gordon Lake Group (GLG) Remediation Project – Waste Management Plan (Plan) in accordance with the MacKenzie Valley Land and Water Board (MVLWB) Guidelines for Developing a Waste Management Plan (2011). Although conceptual in nature, the Plan is being submitted in support of the Type “A” Land Use Permit application for the Project. A more comprehensive plan will be submitted by the successful Primary Remediation Contractor as part of their contract submittal process and in advance of their mobilization to site.

This plan is considered as the minimum standard that submittals will be measured against.

## 1.1 Key Information

Table 1 presents key corporate information pertaining to CARD and the GLG Project sites.

**Table 1 Key information pertaining to CARD and the Gordon Lake Group Remediation Project sites**

<b>Federal Department</b>	Indigenous and Northern Affairs – Contaminants and Remediation Directorate																																																						
<b>Contact Person</b>	Alison Heslep Project Manager Telephone number: (867) 669-2769 Fax number: (867) 669-2715																																																						
<b>Project Office Location</b>	4923 52 <sup>nd</sup> Street Yellowknife, NT, X1A 2R3																																																						
<b>Project Locations</b>	<table border="1"> <thead> <tr> <th>Site</th> <th>Easting</th> <th>Northing</th> <th>Latitude</th> <th>Longitude</th> </tr> </thead> <tbody> <tr> <td>Burnt Island</td> <td>390583</td> <td>6994487</td> <td>63.063316</td> <td>-113.165136</td> </tr> <tr> <td>Camlaren</td> <td>388375</td> <td>6986147</td> <td>62.987838</td> <td>-113.203133</td> </tr> <tr> <td>Goodrock</td> <td>391626</td> <td>6990869</td> <td>63.031177</td> <td>-113.142138</td> </tr> <tr> <td>Kidney Pond</td> <td>381568</td> <td>6982743</td> <td>62.955158</td> <td>-113.334924</td> </tr> <tr> <td>Murray Lake</td> <td>378134</td> <td>6989336</td> <td>63.013144</td> <td>-113.407426</td> </tr> <tr> <td>Storm Property</td> <td>392362</td> <td>6987434</td> <td>63.000593</td> <td>-113.125360</td> </tr> <tr> <td>Treacy</td> <td>381077</td> <td>6981363</td> <td>62.942623</td> <td>-113.343596</td> </tr> <tr> <td>Try Me</td> <td>374546</td> <td>6995744</td> <td>63.069387</td> <td>-113.483110</td> </tr> <tr> <td>West Bay</td> <td>386382</td> <td>6977315</td> <td>62.908017</td> <td>-113.236380</td> </tr> </tbody> </table>					Site	Easting	Northing	Latitude	Longitude	Burnt Island	390583	6994487	63.063316	-113.165136	Camlaren	388375	6986147	62.987838	-113.203133	Goodrock	391626	6990869	63.031177	-113.142138	Kidney Pond	381568	6982743	62.955158	-113.334924	Murray Lake	378134	6989336	63.013144	-113.407426	Storm Property	392362	6987434	63.000593	-113.125360	Treacy	381077	6981363	62.942623	-113.343596	Try Me	374546	6995744	63.069387	-113.483110	West Bay	386382	6977315	62.908017	-113.236380
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## 1.2 Effective Date of Waste Management Plan

This Waste Management Plan is effective as of the above date of submission and will be adhered to once approved by the MVLWB. This Plan is considered to be a living document that will undergo review, at minimum, annually prior to the start of any site activities with additional reviews as warranted to reflect changes in operations, technology, chemicals or fuels, or as directed by the MVLWB. Any revisions to the plan will be submitted to the MVLWB for review and approval.

## 1.3 Revisions to the Waste Management Plan

Table 2 will be used to track reviews and revisions to the Waste Management Plan, and ensure that all stakeholders have the most up to date copy of the plan.

**Table 2 Revision history of the Waste Management Plan**

Version #	Contractor Approval	Date	Crown Approval	Date	Sections Revised	Comments	Revision Distribution Date
v.1	n/a	n/a	Alison Heslep Project Manager	August 4, 2016	n/a	First Approval	n/a

## 1.4 Environment, Health and Safety Policy

INAC’s Environment, Health and Safety (EHS) Policy provides direction in order to meet the requirements of the Canada Labour Code, applicable federal and territorial environmental regulations and policies, and related policies of the Treasury Board in the implementation of the Northern CSP. The policy serves as an integral component of INAC’s CSP and applies to all individuals, including contractors, involved with contaminated sites. Within the Northern CSP, health and safety of employees and protection of the environment are an overriding priority. Management is committed to doing everything possible to prevent injuries and to maintain a healthy environment. To this end:

- Senior managers are responsible for ensuring that all the requirements of the EHS Policy are fully implemented.
- All managers and supervisors are responsible for ensuring that their employees are trained in safe work procedures, to undertake their assigned duties without accidents, injuries or harm to the environment, and for ensuring that employees follow safe work methods and all related regulations. This includes training on industry best practices, assessing and managing EHS risks, and the emergency spill response plan (outlined in the Spill Contingency Plan, to be provided by the Primary Consultant).
- All personnel are required to support and comply with the EHS program, making safety, health and protection of the environment a part of their daily routine, and ensuring that they follow safe work methods and relevant regulations.
- All personnel will be held accountable for implementing, and adhering to, the requirements of



the EHS program.

- All personnel are accountable for reporting to their immediate supervisor any unsafe practices or areas in need of improvement. Personnel are further accountable for bringing such reports to the attention of higher levels in the organization, without fear of reprisal, if the situation is not addressed appropriately.
- All relevant territorial and federal laws, regulations, policies, and industry best practices including the requirements of INAC's CSP Management Framework, are incorporated into our program as minimum standards.
- Pollution prevention practices and programs to achieve continuous improvement will be implemented as an ongoing requirement of the program, and will include recycling when possible.
- Where a conflict arises due to different standards or requirements between different regulations or standards, the more stringent of the two will apply.

This Plan will be presented to all staff during their on-site orientation sessions. During the worker orientation seminar, training sessions will be scheduled to ensure employees have an understanding of their role within the waste management strategy on site.

## 1.5 Purpose and Scope

The purpose of this Plan is to guide the effective waste management activities for the GLG Remediation Project. The Plan is intended to mitigate the effect of two general waste sources: 1) existing legacy waste from the mine and advanced exploration sites; and 2) waste generated from remediation activities. It is intended to be the minimum standard for waste management that CARD requires of itself and its contractors for the duration of the project. Application of this plan to all potential waste generating operations is intended to mitigate any potential EHS risks associated with the project, and will ensure its operations and activities meet all applicable environmental regulatory requirements. All garbage, waste and debris will be disposed of as described in the final approved version of the Waste Management Plan, to be submitted by the Primary Contractor, unless otherwise authorized in writing by an inspector. Waste management practices which best serve the public interest will be employed. This occurs through engagement with and consideration of the Aboriginal communities of the project area. CARD and its contractors will comply with all applicable territorial and federal legislation. The following federal and territorial key acts, regulations and guidelines are applicable to the Project:

- **Federal:**
  - *Transportation of Dangerous Goods Act* and Regulations
  - *Hazardous Products Act*
    - Controlled Products Regulations
  - *Canadian Environmental Protection Act* and Regulations
    - Interprovincial Movement of Hazardous Waste Regulations



- Storage Tank Systems for Petroleum Products and Allied Petroleum Products Regulations
  - *Mackenzie Valley Resource Management Act* and Regulations
- **Territorial**
  - *Environmental Protection Act*
    - Used Oil and Waste Fuel Management Regulations
    - Guideline for General Management of Hazardous Waste
    - Guideline on Waste Batteries
    - Guideline on Waste Antifreeze
    - Guideline on Waste Solvents
    - Guideline on Waste Paint
  - *Transportation of Dangerous Goods Act* and Regulations
  - *Northwest Territories Waters Act*

The primary objective of the GLG Remediation Project is to remediate the existing legacy waste at all nine mine and advanced exploration sites. Waste management for the legacy waste is described within the associated Land Use Permit application (MVLWB) and the Remedial Action Plan (RAP). To avoid repetition, this Waste Management Plan will only consider Project generated waste streams.

## 1.6 Project Description

The GLG Remediation Project consists of nine mine and advanced exploration sites (Burnt Island, Camlaren, Goodrock, Kidney Pond, Murray Lake, Storm Property, Treacy, Try Me and West Bay) located 110 km northeast of Yellowknife around Gordon Lake, Northwest Territories (NWT), within the asserted Akaitcho Territory, homeland of the Weledeh people (Yellowknives Dene First Nations (YKDFN)) since time immemorial. The sites are also located in the Mowhì Gogha De Niitlèè boundary within the Wek'èezhìi management area of the Tlicho settlement area, the asserted Akaitcho Dene territory and traditional lands of the NWT Métis. The GLG sites are located northwest of the East Arm of Great Slave Lake, which falls into the Northwestern Boreal Uplands of Canada. Gordon Lake and surrounding sites are located in the Taiga Shield - Great Slave Upland Low Subarctic (LS) Ecoregion of the NWT. All nine sites fall under the custodial responsibility of INAC, and site remediation is coordinated by INAC's CARD.

The primary objective of this Project is to reduce, and where possible, eliminate the risk to the environment and human health caused by legacy environmental concerns from the nine abandoned mine and advanced exploration sites, to leave as minimal a presence in the area as possible, and to promote socio-economic benefits to Aboriginal people and other northerners.

The Project is expected to span approximately three years (not including monitoring post remediation). Project activities will primarily be limited to the open water season, with the exception of site mobilization and demobilization via a winter road (Tibbitt to Contwoyto Joint Venture (JV winter road)), and winter transportation of equipment and material on winter roads/spurs. Work will commence in December 2016 with a winter road survey and site access preparation, followed by the staging of camps and heavy equipment (February 2017 to March 2017), and initial remediation activities beginning in May 2017. Demobilization of equipment will commence in 2020.



A summary of the Project related activities for the GLG Remediation Project, including a project schedule, are provided in the Table 3. Note this schedule will be finalized by the Primary Contractor.

**Table 3 Project related activities and schedule for the Gordon Lake Group Remediation Project**

Site	Activity	Date
GLG sites	Site Preparation and Staging Material: <ul style="list-style-type: none"> <li>• Winter road track survey</li> <li>• Site access preparation</li> </ul>	December 2016 to February 2017
Burnt Island, Camlaren, Kidney Pond, West Bay (and GD-37), Borrow Source GD-18 and Zenith and North Cabin	Mobilization: Staging Camps and Heavy Equipment; Construct Spur Roads Off JV Winter Road to Access Sites.	February 2017 to March 2017
Burnt Island, Camlaren, Zenith and North Cabin, Kidney Pond, West Bay (GD-37), Goodrock, Murray Lake, Storm Property and Try Me	Construct Road from Borrow Sources to Work Sites; Construct Staging Camps; Quarry Development; Construct Floating Docks and Barge Landing Areas; Commence TCSA and WRSCA Construction; Mobilize Helicopter Portable Excavator; Construct Kidney Pond Portal Seem Management system. Remediation Tasks: <ul style="list-style-type: none"> <li>• Excavate, Stockpile and Consolidate Material;</li> <li>• Non-Hazardous Waste Collection;</li> <li>• Hazardous Waste Collection;</li> <li>• Wood Burning Activities.</li> </ul>	May 2017 to September 2017
Burnt Island, Camlaren, Zenith and North Cabin, Kidney Pond, West Bay, and Borrow Source GD-18	Construct Spur Roads Off JV Winter Road to Access Zenith Island. Remediation Tasks: <ul style="list-style-type: none"> <li>• Transport borrow material to sites and stockpile;</li> <li>• Transport excavated materials and debris to sites for disposal;</li> <li>• Transport hazardous material off-site for disposal.</li> </ul>	February 2018 to March 2018
Burnt Island, Kidney Pond	Excavation and Disposal of On-Site Contaminated Soils; Shaft and Portal Capping; Trench Backfill and Grading; Construct Berms; and Monitor and Adjust Kidney Pond Portal system as required.	May 2018 to September 2018
Camlaren, GLG sites	Treat PHC Impacted Soil; Construct Cover Systems to Close WRSCA and TSCA; Demobilization of Equipment	March 2019 – Winter 2020

## 1.7 Site Description

All nine sites of the GLG Remediation Project are remote with no nearby inhabitants. Access to the sites in the summer is limited to fixed-wing aircraft on floats or helicopter. Winter access to the sites is via the Tibbitt to Contwoyto JV (Joint Venture) Winter Road that runs through the middle of Gordon Lake (north-south),



connecting the Ingraham Trail (Highway 4) to the sites northeast of Yellowknife. Site maps are attached in Appendix A. Table 4 presents the coordinates for individual GLG site locations.

**Table 4 Coordinates for Gordon Lake Group Remediation Project site locations - NAD\_1983\_UTM\_Zone\_12N**

Site	Easting	Northing	Latitude	Longitude
Burnt Island	390583	6994487	63.063316	-113.165136
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## 2 Waste Management Hierarchy

A waste management hierarchy is useful in identifying what waste management strategies are most desirable. The methodology and definitions here are based on MVLWB Guidelines for Developing a Waste Management Plan. In order of preference (from most preferable to least), the options to be considered for each type of waste are:

1. **Source Reduction:** Elimination or decrease of the volume, mass and/or toxicity of waste generated.
2. **Reuse:** Reuse of a product more than once for the same or different purpose, either on or off-site.
3. **Recycle/Recovery:** Materials otherwise destined for disposal are collected, processed and remanufactured either on or off-site.
4. **Treatment:** Method to reduce the volume, mass and/or toxicity prior to disposal.
5. **Release to the Receiving Environment:** Least desirable option, often involving landfilling or other storage and containment options.

Prior to beginning Work on site, the successful Contractor is required to submit a detailed Waste Reduction Work Plan (as a component of the overall Waste Management Plan).

## 3 Identification of Waste Types

Waste management for the existing legacy mines has been developed and is available within the RAP. As previously mentioned, this Waste Management Plan only considers Project generated waste streams. Table 5 displays a breakdown of waste types and the associated document that describes their specific management for reference. Any waste stream that is shared between existing mine waste and Project generated waste will be addressed in both the Waste Management Plan and the RAP.



**Table 5 Waste streams and associated management documents**

Waste Stream	Waste Management Plan (Project generated waste)	Remedial Action Plan (legacy mine waste)
<b>Hazardous Wastes</b>		
Ash or Incinerator Residue	✓	
Batteries	✓	✓
Asbestos Containing Materials		✓
Lead-Based Painted Materials		✓
Co-Mingled Impacted Soil		✓
Metals Impacted Soil		✓
Chemical Wastes – Liquids and Solids	✓	
Metals Impacted Surface Water and Groundwater		✓
Petroleum Hydrocarbon Contaminated Soils		✓
Used Oil, Fuels, Lubricants, Greases, Oil Filter, and Solvents	✓	
<b>Non-Hazardous Waste</b>		
Building Materials	✓	✓
Construction/Demolition Waste	✓	
Camp Facilities Refuse	✓	
Metal Debris	✓	✓
Plastics	✓	
Sewage / Grey water	✓	
<b>Mineral Waste</b>		
Tailings		✓
Waste rock		✓

As previously mentioned, the Primary Contractor will be required to prepare a comprehensive Waste Management Plan outlining the proposed method of handling each kind of Project generated waste streams listed in Table 5. In addition, the Primary Contractor will be required to developed and maintain at the site, one copy of each of the following documents:

- Record of wastes generated and disposed, broken down as follows:
  - Volume of equipment removed from the sites;
  - Volume of material burned prior to placing in the engineered containment area, if any;



- Volume of demolition debris, including ashes generated from buildings that were burned, if any;
  - Volume of demolition debris generated from buildings that were demolished without burning;
  - Volume of broken concrete generated and hauled to the containment area; and
  - Volume of miscellaneous waste collected at the site and along shorelines.
- Record of inert waste material disposed including:
    - Asbestos; and
    - Lead-based paint material.
  - Record of chemicals and reagents collected for off-site disposal including:
    - Chemicals and reagents located on site;
    - Hydrocarbon sludge, and other hydrocarbon wastes on site;
    - Disposal of materials used to decontaminate equipment prior to demobilization;
    - Record of materials protected from landfilling at the request of the NWT Heritage Society; and
    - Record of materials, separate from items requested by the NWT Heritage Society, salvaged by the Primary Contractor.

### 3.1 Description of Waste

Successful waste management requires the separation of different types of wastes, as appropriate. The Primary Contractor will include detailed descriptions, as suggested in the MVLWB Guidelines for Developing a Waste Management Plan for each type of waste management infrastructure. The GLG Remediation Project will require, but not limited to, the following types of waste infrastructure:

1. Incineration;
2. Recyclable Material;
3. Transfer to an Approved Facility; and
4. Wastewater Treatment and Discharge Facilities.

#### 3.1.1 Incineration

Several types of Project generated material will be eligible for incineration. Any incineration should occur after source reduction, reuse and recycling have been considered. Incinerators must meet the requirements of the Canada-wide Standards for Dioxins and Furans and the Canada-wide Standards for Mercury Emissions. An Incineration Management Plan will be submitted by the Primary Contractor to the Departmental Representative for review and approval. The plan must be aligned with Environment Canada's Technical Document for Batch Waste Incineration and comply with the Government of Northwest Territories Environment and Natural Resources guidance document Municipal Wastes Suitable for Open Burning. Incineration is proposed to be used for various reasons, including reduced wildlife attractant to solid waste, and reduction of waste volumes. Incineration of eligible waste will generate ash. Any ash produced from incineration may be subject to testing for contents of hazardous materials. Ash material will be disposed of accordingly, which may include disposing of material in the engineered containment area.

Some items may be appropriate for incineration, while others should never be burned. The following



materials are appropriate for incineration on site, provided the incineration equipment is operating properly:

- Camp facilities food waste;
- Camp facilities refuse (including, paper products, cardboard, paper, newspapers and magazines, most packaging, waxed paper, paper towels, serviettes, and paper cups);
- Natural cloth materials, including clothes, linens, towels, rags;
- Certain building materials; and
- Certain construction and demolition materials.

Fires and burning of rubbish on site, other than waste incineration in accordance with the applicable permits and regulations, is not permitted unless approved by Departmental Representatives, with the exception of unpainted wood.

### 3.1.2 Recyclable Material

All materials appropriate for normal recycling (i.e. empty food cans, plastics) will be bagged and shipped to an appropriate recycling facility. Materials such as plastics, foams and rubbers can be separated on-site and shipped to an approved facility. Select items on site can be sent back to the manufacturer for recycling or reuse. Large, reusable containers such as drums can be sent back to the supplier. Metal parts from heavy equipment can also be sent back to the supplier for reconditioning and reuse.

### 3.1.3 Waste for Transfer to Approved Facility

All project-generated hazardous waste as well as any material which cannot be incinerated or recycled will be packaged and shipped to an approved waste management facility for disposal. This includes material such as:

- Scrap metal;
- Waste oil from vehicles;
- Vehicle components (e.g. anti-freeze and tires);
- Lead acid or alkaline batteries;
- Incinerator ash and residue; and
- Solvents and paint.

All materials destined for off-site disposal must be stored safely and securely before transport. Storage of liquid and solid wastes destined for off-site disposal will be stored in steel drum containers meeting *Transportation of Dangerous Goods Act* and Regulations, closeable lids, and labels for marking contents and date filled. Specific agreements have yet to be established for off-site disposal options. Efforts will be made to ensure that the selected landfill can accept all waste or other landfill options will be explored.

### 3.1.4 Wastewater

A wastewater treatment facility will be required to treat and filter contact water and/or process water generated from activities such as excavations, and camp operations (including, but not limited to grey water, kitchen sumps, traps and black water). The Primary Contractor will be required to submit a design, and



operation and maintenance details of the wastewater treatment facilities, conforming to all applicable regulations sixty days after contract award date. Wastewater treatment facility designs will be required to be stamped by an Engineer registered or licensed to practice in the NWT. The treatment facility will be required to be operated by experienced, qualified personnel in accordance with manufacturer's instructions and procedures submitted by the Primary Contractor and approved by the Departmental Representative. Wastewater storage tanks will be required to store all wastewater. Separate storage facilities will be required for wastewater generated from camp operations and wastewater generated from remediation activities. Wastewater storage tank locations will require approval by the Departmental Representative.

Water discharge on-site must be in compliance with applicable permits, authorizations and approvals. Treated wastewater will be released onto the ground at a location that is a minimum of 30 m from natural drainage courses and 100 m from fish bearing waters (where possible). No direct discharge to surface waters or wetlands is allowed. The Primary Contractor must obtain approval from the Departmental Representative prior to discharging treated wastewater. The Primary Contractor will also be responsible for transporting and disposing of all wastewater to an approved off-site disposal facility in the event that the on-site facility is not functioning.

Grey water produced at camp represents an example where release to the receiving environment is deemed acceptable, as it is not considered hazardous. The water will be placed into natural depressions or sumps in the ground. Potential sumps will be regularly inspected to ensure proper functioning. Potential sumps will be located a minimum of 100 m from any water body, and a final location will be approved by an Inspector. This grey water management strategy has been recommended by Inspectors as an acceptable approach during previous CARD Remediation Projects. In the event that an Inspector is not able to approve grey water disposal at a specific site (e.g. non-conductive surficial material), grey water at that site will be securely stored in tanks, and will either be disposed of by being transported to an approved off-site disposal facility, or transported to a project site that has an approved grey water discharge location.

## 4 Closure

Upon completion of Work, all salvaged materials that remain the property of the Primary Contractor must be removed from the site. All materials that are the property of the Departmental Representative must also be removed from the site as directed by the Departmental Representatives. Material that is removed cannot be stockpiled on any Crown Land.

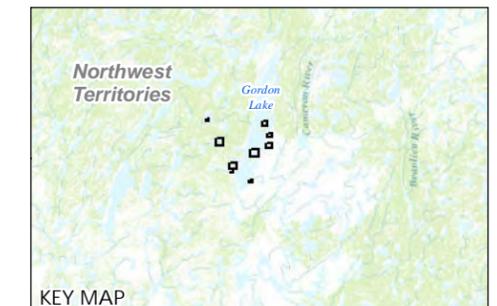
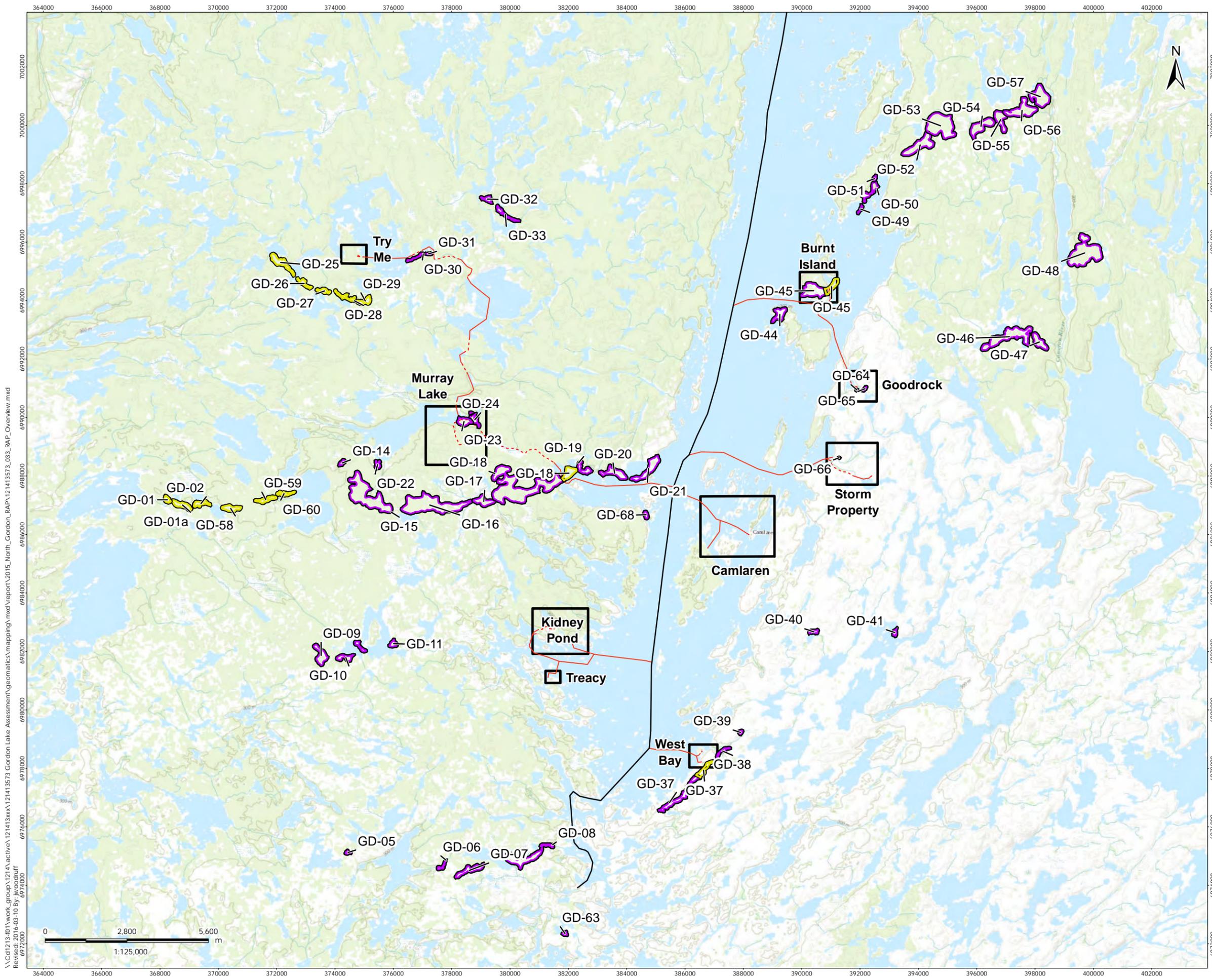


# Appendix A

## Site Map

**Legend**

- - - Over Land Road Section
- Over Water Road Section
- Tibbitt To Contwoyto Winter Road
- Potential Borrow Sources
- Potential Borrow Areas Assessed
- Mine Site Location



- Notes**
1. Coordinate System: NAD 1983 UTM Zone 12N
  2. Basemapping: CANVEC © Department of Natural Resources Canada. All rights reserved.
  3. Geonames from GeoBase®, Downloaded March 2013.
  4. Orthoimagery © MapMart, 2011.
  5. Not all features included in the legend are visible within the map extent

March 2016  
121413573-033

Client/Project  
Public Works and  
Government Services Canada  
Gordon Lake Group Remedial Action Plan

Figure No.  
**1**

Title  
**Gordon Lake Group  
Site Locations**

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 Revised: 2016-03-10 By: jwoodruff