



Mackenzie Valley Land and Water Board
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Staff Report

Applicant: Pine Point Mining Ltd.	
Location: Pine Point, NT	File Number: MV2017C0024
Date Prepared: November 26, 2018	Date of Board Meeting: January 17, 2019
Subject: Updated Waste Management Plan 2.0	

1. Purpose

The purpose of this Report is to present to the Mackenzie Valley Land and Water Board (MVLWB/the Board) an updated Waste Management Plan Version 2.0 (WMP or the Plan) submitted by Pine Point Mining Ltd. (PPML) to satisfy Condition 52 of Land Use Permit (Permit) MV2017C0024.

2. Background

- July 20, 2017 – Permit issuance;
- October 12, 2017 – Permit amendment granted to include additional mineral claims (conditions unchanged);
- October 29, 2018 – updated WMP received;
- October 31, 2018 – updated WMP distributed for review;
- November 14, 2018 – Reviewer comments and recommendations due and received;
- November 21, 2018 – Responses due and received;
- **January 17, 2019 – Waste Management Plan 2.0 presented to the Board for decision.**
- July 19, 2022 – Expiration of Permit.

3. Discussion

PPML holds Permit MV2017C0024 for mineral exploration around the area of the historic Pine Point mine property west of Fort Resolution, NT. The Permit scope includes construction and maintenance of a camp to support drilling operations, however, PPML has not yet utilized a camp in their operations. For this reason, their current approved Waste Management Plan did not include camp-related waste management activities.

On October 29, 2018, PPML submitted a letter indicating that they would like to construct and operate a camp in accordance with the Permit, and included an updated Waste Management Plan in accordance with Condition 52 of the Permit, which requires the Permittee to make revisions to the Plan to reflect changes in operations, and that revisions be submitted to the Board for approval.

Condition 52 reads as follows:

The Permittee shall adhere to the **Waste Management Plan**, once approved, and shall annually review the plan and make any necessary revisions to reflect changes in operations, technology, chemicals, or fuels, or as directed by the Board. Revisions to the plan shall be submitted to the Board for approval.

Description of Plan Updates

PPML included a summary of changes to the Plan in their submission. They are as follows:

- Table 1 – changed maximum volume of greywater to be produced on site;
- Removed references to disposal of waste in Fort Resolution;
- Section 4.3 – added reference to use of incinerating toilets;
- Section 4.3 – changed text from hauling greywater off-site to disposing of greywater on-site into a sump;
- Section 5 – added description of greywater sump; and
- Updated Plan to reflect name-change from Darnley Bay Resources Limited (the previous name of the company) to PPML.

4. Comments

Board staff have reviewed the Plan and confirmed the above-noted updates have been made. Board staff note that disposal of greywater into a sump is an activity which is typical of exploration camps operated under permits issued by the Board. As noted by PPML in their cover letter, sewage will not be disposed of in the sump, this would be disposed of through haul-out to Hay River, or incineration, and appropriate disposal of incinerator ash at an approved facility. The Town of Hay River previously issued a letter indicating they were amenable to receiving waste associated with PPML's project (letter attached to issuance package, attached).

5. Public Review

By November 14, 2018, comments and recommendations on the Plan were received from 3 reviewers:

- Environment and Climate Change Canada (no comment);
- Government of the Northwest Territories (GNWT) – Environment and Natural Resources (no comment); and
- GNWT – Lands.

PPML responded by November 21, 2018. The Review Summary and Attachments (attached) presents the concerns identified through this review.

The GNWT-Lands Inspector recommended that grey water be screened to reduce wildlife attraction, and that any sump not be deeper than four metres. PPML agreed to both recommendations.

Board staff included a comment requesting clarification from PPML regarding relation of the submission to their other permit MV2018C0005. PPML noted that they continue to consider activities between the two permits separate and will conduct activities accordingly. They further noted they have discussed their plans for the camp with an Inspector and did not receive any concerns. The GNWT-Lands Inspector did not raise any concerns related to PPML's plans for the camp, or with the updated Waste Management Plan.

Preliminary Screening

The most recent Preliminary Screening of this project (attached with Amendment Approval) was conducted on October 12, 2017. Board staff reviewed the Preliminary Screening report and confirmed that camp-related activities were screened prior to issuance of the Permit.

6. Security

The status of security for this Project will not be affected by the Board's decisions related to the Plan. Liabilities associated with camp construction and operation were included in security estimates considered by the Board when security was set in the Permit at issuance (see attached July 20, 2017 Staff Report), therefore, no updates to security are required.

7. Conclusion

Board staff conclude there are no outstanding issues or concerns with this Plan.

8. Recommendation

Board staff recommend the Board **make a motion to approve the updated Waste Management Plan Version 2.0** as required by Condition 52 of Land Use Permit MV2017C0024.

A draft decision letter is attached.

9. Attachments

- [Waste Management Plan Version 2.0](#)
 - [Cover Letter](#)
- [July 20, 2017 Staff Report and Comments for Permit Issuance](#)
- [October 12, 2017 Amendment Approval with Preliminary Screening](#)
- Review Summary and Attachments
- Draft Decision Letter from the Board

Respectfully submitted,



Julian Morse
Regulatory Specialist

Review Comment Table

Board:	MVLWB
Review Item:	Pine Point Mining Limited - Revised Waste Management Plan (MV2017C0024)
File(s):	MV2017C0024
Proponent:	Pine Point Mining Limited
Document(s):	MV2017C0024 - PPML - Revised WMP Cover Letter (683KB) MV2017C0024 - PPML - Revised Waste Management Plan - Oct29_18 (323KB)
Item For Review Distributed On:	Oct 31 at 16:46 Distribution List
Reviewer Comments Due By:	Nov 14, 2018
Proponent Responses Due By:	Nov 21, 2018
Item Description:	<p>Pine Point Mining Limited (PPML) submitted a Revised Waste Management Plan on October 29, 2018. This Plan is required by Permit MV2017C0024 condition 52. PPML has updated this Plan to account for operation of a camp, in particular, deposit of greywater at the site. Reviewers will note that construction and operation of a camp is included in the scope of the Permit.</p> <p>Reviewers are invited to submit comments and recommendations using the Online Review System (ORS) by the review comment deadline specified below. If reviewers seek clarification on the submission, they are encouraged to correspond directly with the proponent prior to submitting comments and recommendations.</p> <p>Reviewers may also wish to consider providing an indication of whether they are in support of the submission to provide context for comments and recommendations and to assist the Board with its decision.</p> <p>All documents that have been uploaded to this review are also available on our public registry. If you have any questions or comments about the ORS or this review, please contact Board staff identified below.</p>
General Reviewer Information:	<p>This review item has also been distributed by fax to the following organizations:</p> <p>NWT Metis Nation Tim Heron NWTMN IMA Coordinator (867)872-3586; rcc.nwtmn@northwestel.net;</p> <p>Fort Simpson Métis Local #52 Marie Lafferty President (867)695-2040;</p>
Contact Information:	Jen Potten 867-766-7468 Julian Morse 867-766-7453

Comment Summary

Environment and Climate Change Canada: Eva Walker				
ID	Topic	Reviewer Comment/Recommendation	Proponent Response	Board Staff Analysis
1	ECCC No Comment	<p>Comment Environment and Climate Change Canada has reviewed the materials provided for the revised waste management plan in accordance with the department's mandate and has no comments at this time.</p> <p>Recommendation N/A</p>		N/A
GNWT - ENR: Central Email GNWT				
ID	Topic	Reviewer Comment/Recommendation	Proponent Response	Board Staff Analysis
1	General File	<p>Comment (doc) ENR Letter - No Comments or Recommendation at this time</p> <p>Recommendation</p>		N/A
GNWT - Lands - South Slave Region - Fort Smith: Mike Vassal				
ID	Topic	Reviewer Comment/Recommendation	Proponent Response	Board Staff Analysis
1	Sumps at the PPM camp	<p>Comment Pine Point Mining plans to put their camp on a waste rock pile approximately 6 metres above the surrounding land. The sump(s) will be above the height of the surrounding land, so grey water will not be going directly into the water table.</p> <p>Recommendation Ensure that the sump(s) are not deeper than the height above the surrounding landscape. Sump(s) should be no deeper than 4 metres.</p>	Nov 16: PPML agrees.	Noted
2	Grey water at PPM camp	<p>Comment Pine Point Mining is proposing to have the camp run during both the summer and winter seasons. Grey water is a known attract for wildlife.</p> <p>Recommendation Recommend that grey water from the kitchen be thoroughly screened to minimize the amount of food material going into the sump.</p>	Nov 16: PPML agrees.	Noted
MVLWB: Julian Morse				
ID	Topic	Reviewer Comment/Recommendation	Proponent Response	Board Staff Analysis
1	Camp Use Associated with MV2018C0005	<p>Comment Board staff note that the changes to the Waste Management Plan are associated with construction and operation of a camp under Permit MV2017C0024. In his August 23, 2018 Inspection Report, the Inspector noted that PPML was using a</p>	Nov 16: PPML does not concur with the Inspector's conclusions related to camp usage as	Satisfactory response. Board staff notes that PPML has discussed the

		<p>camp under the authority of a different permit for drilling associated with MV2017C0024. The Inspector's comments were as follows: "The Inspectors note that the drilling activities are being conducted under the authority of Land Use Permit MV2018C0005 (Confirmation Drilling) and use of the camp is under the authority of MV2017C0024 (Exploration Drilling). Land Use Permit MV2018C0005 does not authorize the use of a camp. The use of a camp under the authority of MV2017C0024 for drilling activities under a different permit will only be permitted for this falls drill program. The Inspector recommends that Pine Point Mining Limited consider the following options to ensure there is no project-splitting and that all activities are covered under the appropriate permit: 1. Land Use Permits MV2017C0024 and MV2018C0005 be combined into one land use permit or: 2. Pine Point Mining Limited apply for an amendment to MV2018C0005 to include the use of a camp." PPML have not formally responded to the Inspector's recommendations. Board staff concur with the Inspector's first recommendation, that PPML apply to combine the two permits and include a camp under the new permit, which will streamline permitting for the project and reduce the potential for confusion. PPML appears to be addressing the Inspector's concerns associated with Permit MV2017C0024. It is unclear however, whether PPML's intention is to use this camp exclusively for activities associated with that Permit, or with both of their permits.</p> <p>Recommendation: Does PPML intend to address the need for camp use associated with MV2018C0005? Board staff recommend PPML clarify their intentions, and respond to the Inspector's recommendations.</p>	<p>stated in the August 23, 2018 Inspection Report. An existing camp in the Pine Point District was in operation in 2018 by a separate permittee for a separate project. Beds became available as that project was winding down and the camp contractor offered camp services to PPML's drilling team and consultants on a daily room and board basis. PPML had no responsibility for the operation of the camp or the camp contractor's permit compliance. PPML made no decisions about camp operations; PPML just paid the daily rate and took advantage of the proximity of the camp to our work location. The camp was occupied by the permittee's staff and contractors during the entire time PPML rented beds there. PPML was assured by the camp operators that PPML's use of camp beds had been cleared by the</p>	<p>camp issue with an Inspector. Board staff raised the issue for the purpose of clarification. The Inspector did not raise any concerns with PPML's proposal through the changes to the Waste Management Plan.</p>
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			<p>issuer of the permit for the camp. All PPML invoicing for camp use was received from and paid to DKFN, which was responsible for camp operations for the permittee. PPML is no longer renting any beds at that camp. PPML met with the Inspector on August 31, 2018, explained the current housing situation, and discussed camp options going forward (please see Sept. 13, 2018 Inspection Report for Permit MV2018C0005). PPML's understanding from that conversation was that if a camp was established by PPML to house the exploration program's workers (under the conditions described in LUP MV2017C0024) and that there were empty beds at the camp, that PPML could fill those beds with other PPML workers and contractors as long as some of the beds were occupied by exploration drilling</p>	
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			<p>workers (operating under MV2017C0024). As stated in our application for this WMP Amendment, worker safety is one of the reasons that we wish to establish a camp at the site. We have recently had an incident where a worker fell asleep at the wheel and went off the road when commuting back to town after their long work shift at the drill. Fortunately, no one was hurt, but this does reinforce for us the importance of having flexibility to fill camp beds if they are available. As for Inspector's Recommendation #1 (combine permits), PPML does not wish to adopt this recommendation at this time. The Permits are for different projects and have different time-lines. The company has invested most of its 2018 resources into the Confirmation Drilling program (covered by MV2018C0005) and anticipates that it</p>	
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			<p>may be possible to close out that program and permit prior to its expiry in 2020. The Exploration program was reduced in the summer of 2018 (covered by MV2017C0024), but it picked up this fall and will comprise a substantial part of our work during the winter 2019 on through 2020 and will serve the company for years to come. As all are aware, significant costs would be incurred by both the company, the GNWT and the MVLWB to accomplish the issuance of a new combined permit that might not even be needed by the time it is issued. As for Inspector's Recommendation #2 (amend 2nd permit in order to build a 2nd camp), PPML does not wish to adopt this recommendation at this time. It would be cost prohibitive and inefficient to have 2 camps. In the short term, PPML will be running an</p>	
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			<p>exploration drilling program this winter (notification of drill targets at W-85 and N-204, etc. have already been sent to the Inspector). PPML respectfully requests that our request be approved to make minor changes to the Waste Management Plan for camp operations under this exploration program. Please note that PPML may decide, as a separate matter in the future, to apply to modify MV2018C0005 to be allowed to house confirmation drilling program workers at an existing PPML camp facility. Such an application might meet the needs of the company while simultaneously helping the MVLWB to accomplish what they feel is a shortcoming in the permit structure. However, that matter is not something that the company wishes to have tied to this application at this time.</p>	
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November 14, 2018

Jen Potten
Regulatory Officer
Mackenzie Valley Land and Water Board
7th Floor – 4910 50th Avenue
P.O. Box 2130
Yellowknife, NT
X1A 2P6

Dear Ms. Potten,

**Re: Pine Point Mining Ltd.
Land Use Permit – MV2017C0024
Revised Waste Management Plan
Request for Comments**

The Department of Environment and Natural Resources, Government of the Northwest Territories has reviewed the plan at reference based on its mandated responsibilities under the *Environmental Protection Act*, the *Forest Management Act*, the *Forest Protection Act*, the *Species at Risk (NWT) Act*, the *Waters Act* and the *Wildlife Act* and has no comments or recommendations for the consideration of the Board at this time.

Should you have any questions or concerns, please do not hesitate to contact Patrick Clancy, Environmental Regulatory Analyst at (867) 767-9233 Ext: 53096 or email patrick.clancy@gov.nt.ca.

Sincerely,

Patrick Clancy
Environmental Regulatory Analyst
Environmental Impact Assessment Section
Conservation, Assessment and Monitoring Division
Department of Environment and Natural Resources
Government of the Northwest Territories