

16 January 2019

Tyree Mullaney,
Regulatory Specialist
Mackenzie Valley Land and Water Board
4922 48th Ave., 7th Floor, YK Centre Mall
PO Box 2130
Yellowknife, NT
X1A 2P6

Dear Ms. Mullaney,

Re. MV2018F0024: Nahanni Construction Ltd.'s Lupin Winter Access, Supplemental Information

Further to your letter dated 27 December 2018 and the subsequent phone discussion, please find enclosed the following supplemental documents in support of Nahanni Construction Ltd.'s (NCL; the Applicant) application to construct, operate and close a winter road within the existing Tibbitt to Contwoyto Winter Road (TCWR) corridor extending from the Ekati Mine turnoff on Lac de Gras to the Lupin Mine in Nunavut:

- Revised application form;
- Revised Community Engagement Plan;
- Updated Engagement Log;
- Revised security estimate;
- Shapefiles and coordinates for the road route; and
- Waste Management Plan.

Further, the following sections addresses the MVLWB's requests for additional information.

Item 1: Project Coordinates

Further to a phone discussion between NCL and MVLWB staff, it was determined that minimum and maximum latitudes and longitudes, as listed *Section 16 Location of Activities by Map Coordinates* of the Application Form, are not required for this proposed scope. Instead, it was determined that a table providing coordinates along the route would suffice. Accordingly, please refer to Table 1, appended to this letter. The Application Form has been updated to reflect this.

Item 2: Equipment List

As per section 10 of the Application Form, equipment is listed. Should extra space be required, the Form directs the Applicant to "Use a separate page, if necessary". Accordingly, the equipment list is continued in *Section 19 Additional Information* under the subheading *10. Equipment List Continued* on the final page of the Application Form.

There remains only one equipment list included in the Application. It is understood that the original Application was not incomplete in this regard.

Item 3: GIS Data

Shapefiles pertaining to the existing road route have been included herein.

Item 4: Waste Management Plan

Other than in an emergency situation, no waste will be generated by the proposed scope of work. Regardless, the *Waste Management Plan, Lac de Gras to Lupin* (Nahanni Construction Ltd. 2018) was requested and has been appended to this submission.

Item 5: Engagement Plan and Engagement Log

Your letter states that an Engagement Plan and Engagement Log need to be submitted in order for the Application to be considered complete. Through discussion over the phone it was confirmed that the *Community Engagement Plan, Lac de Gras to Lupin* (Nahanni Construction Ltd. 2018; the Engagement Plan) and the related *Engagement Summary* provided by the Applicant with the Application were in fact received by the MVLWB, and so it is understood that the original Application was not incomplete in this regard.

Through that discussion it is now understood, however, that the format in which triggers for engagement were identified in the *Engagement Plan* was insufficient. Accordingly, the *Engagement Plan* has been updated to clearly list this information in a tabular format, as requested.

Further, through that discussion, an updated *Engagement Summary* was requested, listing ongoing engagements. An updated engagement record has been appended to this submission.

Item 6: Security Estimate

As requested in your letter and discussed over the phone, the *Security Estimate* has been revised to include construction and closure of the road only; please see attached.

Closure

In addition to email, hardcopies and additional softcopies of this submission have been provided to your office.

NCL expects that the appended materials satisfy the MVLWB's completeness review and are hopeful that the Application may proceed through the review process. Should you have any questions about the attached materials, please contact Sharleen Hamm at 604-996-1110 or via email at regulatory@nahannincl.com.

Regards;



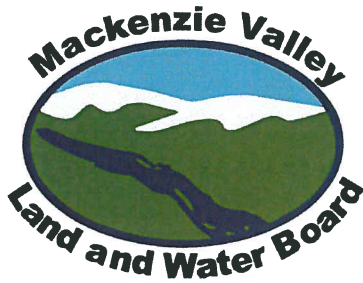
Kenny Ruptash
Vice President - Projects
Nahanni Construction Ltd.

Encl.

- cc. S. Poole, Screening Officer, Akaitcho Territory Government
R. Bjornsen, Resource Management Coordinator, Deninu Kue First Nation
L. King, Lands Manager, Lutsel'Ke Dene First Nation
T. Huron, Lands and Resource Manager, NWT Metis Nation
M. Birlea, Manager of Lands Protection, Tli Cho Government
J. Black, Yellowknives Dene First Nation
G. Clark, Director of Lands, Kitikmeot Inuit Association
R. Near, TCJV Committee
T. Arko, Technical Director, Nunavut Impact Review Board

Table 1. Coordinates for points along the proposed winter road route alignment.

Feature ID	Point ID	Longitude	Latitude
0	1	-111.2341594	65.77917122
1	2	-111.1403304	65.79441198
2	3	-110.8681918	65.69651677
3	4	-110.6811563	65.64789779
4	5	-110.4514014	65.5243696
5	6	-110.2309842	65.39993098
6	7	-109.8783989	65.28732641
7	8	-109.7757167	65.20286566
8	9	-109.680819	65.12185807
9	10	-109.7171734	65.03356105
10	11	-109.7194375	65.03082829
11	12	-109.725032	65.02407207
12	13	-109.739037	65.00714399
13	14	-109.7874266	64.94848779
14	15	-109.917558	64.86167221
15	16	-109.9697881	64.85429591
16	17	-110.0272751	64.84615326
17	18	-110.0978356	64.82855087
18	19	-110.1408717	64.71880059
19	20	-110.0476168	64.57102691
20	21	-110.1915516	64.51178426



Mackenzie Valley Land and Water Board

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Land Use Permit Application Form

(Subsection 19(2) and Schedule 2 of the Mackenzie Valley Land Use Regulations)

1 Applicant Name: Nahanni Construction Ltd. Applicant's Mailing Address: PO Box 2076 Yellowknife, NT X1A 2P6		Fax no.: 867-873-9620 Telephone no.: 867-873-2975
2 Head office address: PO Box 2076 Yellowknife, NT X1A 2P6 Field supervisor: Jared Buchco		Fax no.: 867-873-9620 Telephone no.: 867-873-2975 Email address: jared@nahannincl.com
3 Other personnel (subcontractor, contractors, company staff etc.): Total number of persons on site: Up to 15 at one time		
4 Eligibility (Refer to section 18 of the Mackenzie Valley Land Use Regulations): <input type="checkbox"/> (a)(i) <input type="checkbox"/> (a)(ii) <input type="checkbox"/> (a)(iii) <input checked="" type="checkbox"/> (b)		
5 Other rights, licences or permits related to this permit application (mineral rights, timber permits, water licences, etc.): <i>To complete this section of the Application Form, please see page 16 of the Board's Guide to the Land Use Permitting Process for more information.</i> Tibbitt to Contwoyto Joint Veinture holds a LOO for the corridor. INAC-Lands (NU) Land use permit (underway) Nunavut Water Board Approval for Use Without a Licence (underway)		
6 a) Summary of operation (describe purpose, nature and location of all activities). Refer to paragraph 19(3)(b) of the Mackenzie Valley Land Use Regulations: <i>To complete this section of the Application Form, please see page 15 of the Board's Guide to the Land Use Permitting Process for more information.</i> The Applicant wishes to obtain access to a portion of the Tibbitt to Contwoyto Winter Road (TCWR) route from the Ekati Mine turnoff on Lac de Gras in the Northwest Territories (NT; Lac de Gras) to the Lupin Mine in Nunavut (NU; Lupin) in order to construct and operate this		
b) Indicate if a camp is to be set up. If yes, indicate size of camp or describe camp. (Provide details on a separate page, if necessary): No camp is proposed. A tow-behind camp will be used as an emergency shelter during construction.		

7 Summary of potential environmental and resource impacts and mitigation measures (describe the effects of the proposed land-use operation on land, water, flora and fauna and related socio-economic impacts). (Use separate page if necessary):

To complete this section of the Application Form, proponents are encouraged to use Appendix B of the Board's [Guide to the Land Use Permitting Process](#).

Refer to attached Environmental and Resource Effects Assessment and the attached Environment and Heritage Resources Protection Plan

8 Proposed restoration plans (Use a separate page if necessary):

To complete this section of the Application Form, please see page 16 of the Board's [Guide to the Land Use Permitting Process](#) for more information.

Refer to the attached Abandonment and Restoration Plan.

Roads:

(Provide details on a separate page.)

Is this to be a pioneered (new) road?

Has the route been laid out or ground truthed?

9 Proposed disposal methods:

To complete this section of the Application Form, a waste management plan for the proposed activities is to be developed in accordance with the Board's [Guidelines for Developing a Waste Management Plan](#) and submitted as an attachment to the Application Form. A template for this Plan is provided in the Guidelines.

a) Garbage: transported offsite for disposal

b) Sewage (Sanitary and grey water): transported offsite for disposal

c) Brush & trees: no disturbance to trees and brush is proposed

d) Overburden (Organic soils, waste material, etc.): no disturbance to overburden is proposed

10 Equipment (includes drills, pumps, etc.) (Use separate page if necessary):

Number	Type and Size	Proposed use
2	Loaders	Snow clearing
6	Snowmobiles	Support route selection and to transport people and supplies
2	Ice profilers	Determine ice thickness
8	Water pumps	Winter road construction
2	Dozers	Portage construction
1	Haglund	Snow compaction
2	Water trucks	Road construction
2	Snow cats	Snow clearing

11 Fuels:	Number of containers:	Capacity of containers:	Location:
Diesel	6	450 L	Various, tidy tanks in the back of pick-up
Gasoline	10	50L	Various, for refueling water pumps as r
Aviation Fuel	-		
Propane	5	100 lb	Emergency shelter/sled camp
Other	5	210 L	Diesel for emergency shelter

12 Containment fuel spill contingency plans (attach separate contingency plan if necessary):

A spill contingency plan for the proposed activities is to be developed in accordance with INAC's Guidelines for Spill Contingency Planning, April 2007 (accessible [here](#)). This Plan is to be submitted as an attachment to the Application Form.

See attached Spill Contingency Plan.

13 Methods of fuel transfer (to other tanks, vehicles, etc.):

Heavy equipment constructing the road will be refueled from pick-up truck mounted tidy tanks. Pick-up truck mounted tidy tanks will be refueled off-site at a suitable facility.

14 Period of operation (includes time to cover all phases of project work applied for, including restoration):

From (DD/MM/YY) 15/01/19

To (DD/MM/YY) 15/05/23

15 Period of permit (up to five years, with maximum of two years of extension):

Start Date (DD/MM/YY): 15/01/19

Completion Date (DD/MM/YY): 01/01/24

16 Location of activities by map coordinates (attach maps and sketches):

To complete this part of the Application Form, please see the [Standards for Geographic Information Systems \(GIS\) Submissions](#).

Minimum latitude (degree, minute): See attached shapefiles and related table of coordinates.

Maximum latitude (degree, minute):

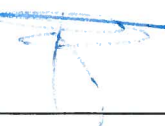
Minimum longitude (degree, minute):

Maximum longitude (degree, minute):

Map Sheet no.:

17 Applicant (print name in full, in upper case): KENNY RUPTASH

Signature:



Date (DD/MM/YY):

18 Application fees for Type A or Type B permit (for federal and non-federal lands)¹:

a) Application fees for Type A or Type B permit (include the first two hectares) - \$150.00: \$ 150.00

AND

b) Land-use fees for **federal public lands only**:

If more than two hectares of federal public lands are being used, enter the number of hectares in excess of the two hectares included in the Application fee.

_____ hectares at \$50.00/hectare \$

1. To help identify whether your activity is on federal lands, please see [this map](#).

Total fees²: \$ 150.00

2. Please make all cheques payable to the Receiver General for Canada.

Continued from Application

8. The route has been laid out and established by the TCWR JV.

10.

Equipment list continued.

- 1 temporary, mobile camp on a sled for use as an emergency shelter during construction
- 3 graders for snow clearing
- 8 pick-up trucks for snow removal and transport of crew, supplies and fuel (in a tidy tank)
- 1 side-by-side for crew transport

The following pieces of equipment are expected to transit the road during operations

- 40 Super B trucks, for transporting fuel and lubricants to Lupin
- 10 end dump trucks for use at and transport of parts and tires to Lupin
- 1 drill rig for use at Lupin
- 2 B trains to transport supplies to Lupin
- 4 flat decks to transport supplies to Lupin

11. In addition to the fuel that may be contained or consumed on site, 1,500,000 L of diesel and 80,000 L of lubricants will be transported along the winter road to Lupin, in Super B trucks. Further, 40,000 kg of lime and 10,400 kg of ANFO will also be transported along the road to Lupin.

The following documents are appended to this application form:

- Cover letter;
- Certificate of incorporation;
- Project Description;
- Figure 1 (map);
- Road route shapefiles and table of coordinates;
- Environmental and Resources Effects Assessment;
- Community Engagement Plan;
- Engagement Log;
- Spill Contingency Plan;
- Wildlife Protection Plan;
- Waste Management Plan
- Environment and Heritage Resources Protection Plan;
- Abandonment and Restoration Plan;
- Indication of support from the TCJV;
- Cheque for application fees;
- Security estimate.