

## Review Comment Table

<b>Board:</b>	SLWB
<b>Review Item:</b>	Great Bear Lake Sites 2016 Revised Water Quality Monitoring Report (S17L8-002)
<b>File(s):</b>	<a href="#">S17L8-002</a>
<b>Proponent:</b>	INAC - Contaminants and Remediation Directorate
<b>Document(s):</b>	<a href="#">2016 WQMR Cover letter</a> (34.0kB) <a href="#">Great Bear Lake Sites 2016 Water Quality Monitoring Report</a> (49.1 MB) <a href="#">2016 WQMR review comment table (S15L8-001)</a> (1.4 MB)
<b>Item For Review Distributed On:</b>	May 15 at 10:20 <a href="#">Distribution List</a>
<b>Reviewer Comments Due By:</b>	June 12, 2018
<b>Proponent Responses Due By:</b>	June 26, 2018
<b>Item Description:</b>	<p>Indigenous and Northern Affairs Canada (INAC) - Contaminants and Remediation Division (CARD) has submitted Great Bear Lake Sites 2016 Revised Water Quality Monitoring Report (WQMR) for Water Licence S17L8-002. The revised report is being submitted in response to SLWB letter dated September 11, 2017 that granted interim approval of the 2016 WQMR (submitted under WL S15L8-001) and required subsequent revisions be made in accordance with comments made during the review (attached) with consideration that emphasis should be on presenting the 2016 results.</p> <p>This report is being submitted to satisfy Part D conditions 9 and 10 for a Baseline/Pre-remediation Water Quality Monitoring Report. As per Part D, Condition 9 "the Plan will include an outline of sampling locations, methodology, and analytical testing parameters with QA/QC" and Par D, Condition 10 " This report will include a summary of all pre-remediation water quality monitoring results with statistical analysis to determine the ability to detect changes in the water chemistry during the construction/remediation."</p> <p>Reviewers are invited to submit comments and recommendations through the Online Review System by <b>June 12, 2018</b>.</p>
<b>General Reviewer Information:</b>	If you have any questions about this review item or the Online Review System please contact Bonnie Bergsma at (867) 496-2778 or email <a href="mailto:bonnie.bergsma@slwb.com">bonnie.bergsma@slwb.com</a> .
<b>Contact Information:</b>	Bonnie Bergsma Sabrina Sturman 867-598-2413

## Comment Summary

Environment and Climate Change Canada: Bradley Summerfield				
ID	Topic	Reviewer Comment/Recommendation	Proponent Response	Board Staff Response
1	ECCC no comments	<b>Comment</b> ECCC is generally satisfied with INAC-CARD's responses to comments and concerns raised by ECCC regarding the initial version of the 2016 Water Quality Monitoring Report, and with the commitment to incorporate the broader recommendations in future monitoring reports. <b>Recommendation</b> N/A	<b>June 27:</b> INAC appreciates the feedback.	No comment
GNWT - ENR: Central Email GNWT				
ID	Topic	Reviewer Comment/Recommendation	Proponent Response	Board Staff Response
7	General File	<b>Comment</b> ( <a href="#">doc</a> ) ENR Letter with Comments and Recommendations <b>Recommendation</b>		
1	Topic 1: Trend Analysis	<b>Comment</b> ENR provided comments on Version 1 of the plan on August 15, 2017. Within those comments, ENR recommended that INAC CARD assess any implications of the 2016 results as they related to trend analysis and if there were any issues moving forward in understanding site conditions over time. In their response, it was noted that INAC CARD will incorporate this recommendation into the 2017 Monitoring Report. <b>Recommendation</b> 1) ENR will provide comments on the 2017 Monitoring Report upon its submission.	<b>June 27:</b> INAC submitted the 2017 Water Quality Monitoring Report to the Sahtu Land and Water Board (SLWB) in March 2018. As with other similar projects, this was included as part of the Annual Water Licence Report (Appendix C), due to the presence of Water Licence Surveillance Network Protocol (SNP) stations in the monitoring campaign. The SLWB included ENR on the distribution list and comments were received from a representative of the department. It is noted that INAC was requested by the	Response acceptable

			<p>SLWB to provide results of 2017 monitoring as “data report” while trend analysis is to be incorporated in the forthcoming Baseline Water Quality Monitoring Report, as required in Water Licence S17L8-002 Part D, Item 10 (due six months prior to the start of remediation).</p> <p>Notwithstanding this upcoming deliverable, consultations were conducted with the SLWB to clarify their preference for “data reports” and future monitoring reports will include reference to historic monitoring results at the sampling stations.</p>	
2	Topic 2: Adaptive Management	<p><b>Comment</b> In ENR's comments dated August 15, 2017, it was requested that INAC CARD outline if any closure criteria had been developed for the various Great Bear Lake (GBL) mine sites and if so, if there would be comparisons provided in the future comparing how water quality on-site relates to these values. In their response, INAC CARD noted that: "Site Specific Target Levels (SSTL) for Arsenic were developed for discharge waters from the Terra Mine Ho Hum Tailings Containment Area (TCA) wetland into Moose Bay of the Camsell River. For all other waterbodies, an adaptive management framework will be developed where applicable and detailed</p>	<p><b>June 27:</b> Water Licence S17L8-002 Schedule D, Part D, Item 4 details the requirements of the Construction Monitoring Plan. Sub-section L includes the specific requirements of the Adaptive Management Plan as part of this deliverable, to be submitted to the SLWB 90 days prior to the commencement of remediation. In the current pre-remediation stage, there have been no earthworks or site alterations to date which could be expected to alter the receiving environment or aquatic conditions. An adaptive management framework is not typically employed in such pre-activity environments. Nevertheless,</p>	Response acceptable

		<p>within the WQMP, as discussed in response to ENR Comment 2." The response to ENR comment 2 indicated that an Adaptive Management Plan will be presented in a Water Quality Monitoring Plan to be applied during and following remediation. As per the SLWB's Staff Report dated August 28, 2017, the Board amended that Water Licence to include Pre-Construction/Baseline Monitoring Report, Construction Monitoring Plan, Post-Construction Monitoring Plan and Long-Term Monitoring Plan. As such, it isn't clear how and when then the adaptive management framework will be developed.</p> <p><b>Recommendation</b> 1) ENR requests clarification on the timing of development of an adaptive management framework as it relates to the updated Water Licence including requirements for monitoring plans at different phases of the project.</p>	<p>INAC has committed to conduct increased sampling should ongoing monitoring indicate rising contaminant concentrations or emerging concerns.</p>	
3	Topic 3: Contact Lake Radionuclides	<p><b>Comment</b> ENR had previously asked questions regarding the status of surface water at Contact Lake as it relates to drinking water guidelines for radioactivity and asked clarification if monitoring will continue. In their response, INAC CARD notes that this recommendation will be incorporated into the 2017 Monitoring Report and Water</p>	<p><b>June 27:</b> As detailed within the Great Bear Lake Sites 2017 Water Quality Monitoring Report, additional sampling was conducted at Contact Lake Mine in 2017, including for radionuclides. Moving forward, radionuclide analysis will be incorporated in a subset of samples, though it is noted that there are no</p>	Response acceptable

		<p>Quality Monitoring Plan requirements.</p> <p><b>Recommendation</b> 1) ENR will review subsequent submissions as they relate to this topic, when available.</p>	<p>radiological concerns identified in Contact Lake or other downstream receiving environments.</p>	
4	<p>Topic 4: Temporal Trends</p>	<p><b>Comment</b> ENR had requested that INAC CARD provide additional information (i.e. narratives, figures, etc.) on temporal trends for water quality for parameters of concern at the Terra Mine, Northrim and Norex/Graham Vien. In response, INAC CARD concurred with this recommendation and noted that it would be incorporated into the 2017 Monitoring Report and Water Quality Monitoring Plan requirements.</p> <p><b>Recommendation</b> 1) ENR will review subsequent submissions as they relate to this topic, when available.</p>	<p><b>June 27:</b> INAC submitted the 2017 Water Quality Monitoring Report to the Sahtu Land and Water Board (SLWB) in March 2018. Consistent with other similar projects, this was included as part of the Annual Water Licence Report (Appendix C), due to the inclusion of SNP stations in the monitoring campaign. The SLWB included ENR on the distribution list and comments were received from a representative of the department. It is noted that INAC was requested by the SLWB to provide results of 2017 monitoring as “data report” and trend analysis is to be included in the forthcoming Baseline Water Quality Monitoring Report as required in Water Licence S17L8-002 Part D, Item 10 (due six months prior to the start of remediation). Notwithstanding this upcoming deliverable, consultations were conducted with the SLWB to clarify their preference for “data reports” and future monitoring reports will include reference to historic monitoring results at the sampling stations.</p>	<p>Response acceptable</p>

5	Topic 5: Revisions Table	<p><b>Comment</b> ENR notes that without doing a detailed cross-reference between the different versions of the report it is difficult to determine which sections have been updated since the last iteration. As such, ENR limited its review to comments provided during the last review period and responses provided by INAC CARD. During the past several years, the Land and Water Boards and proponents have been moving towards the inclusion of a "Revisions Table" for updated versions of Plans at the beginning of the document to assist reviewers in focusing on changes and updates and assist in limiting the scope of the review.</p> <p><b>Recommendation</b> 1) ENR recommends the Board include a request for revisions tables in future plans.</p>	<p><b>June 27:</b> INAC appreciates that it would facilitate review to track report changes. However, INAC's efforts to incorporate the reviewer's comments often requires comprehensive document revisions. As was the case in the current document, hundreds of individual revisions were made and tracking would have been prohibitive. INAC feels that the use of this current SLWB reviewer table is a thorough but practical approach to documenting report revisions.</p>	Response acceptable
6	Topic 6: 2017 Monitoring Report	<p><b>Comment</b> As noted above, there were several references to future information being provided in the "2017 Monitoring Report". ENR has reviewed Water Licence S17L8-002 and isn't clear as to submissions dates or requirements related to this report.</p> <p><b>Recommendation</b> 1) ENR requests that INAC CARD clarify the submission date and Water Licence requirements related to the 2017 Monitoring Report referenced in their responses.</p>	<p><b>June 27:</b> INAC submitted the 2017 Water Quality Monitoring Report to the SLWB in March 2018. Consistent with other similar projects, this was included as part of the Annual Water Licence Report (Appendix C), due to the inclusion of SNP stations in the monitoring campaign. The SLWB included ENR on the distribution list and comments were received from a representative of the department.</p>	Response acceptable

Sahtu Renewable Resource Board: Colin Macdonald

ID	Topic	Reviewer Comment/Recommendation	Proponent Response	Board Staff Response
1	General Report	<p><b>Comment</b> Overall, the report is well written and organised. The sections for each site are concise and the results of past and 2016 sampling are well organised in the tables. It is important to note that none of these sites have matching reference sites or background sites. Elevated metal levels are probably associated with previous mining activity, but it isn't surprising to find elevated metals levels in surface waters in mineral-rich areas, which might affect remediation objectives.</p> <p><b>Recommendation</b> One recommendation would be to include results of site specific risk assessments that place the 2016 data in context of the site remediation goals. Water is one of the weaker media to monitor site conditions due to variation in weather conditions, single sample/single time sampling and local environmental chemistry. Water monitoring data could be supported by the analysis of other media (e.g., sediment and soil) for better integration of local conditions.</p>	<p><b>June 27:</b> INAC concurs that the results of site specific risk assessments and site remediation goals provide valuable context to monitoring data. It is INAC's intention to incorporate these considerations into the forthcoming Construction/Remediation Monitoring Plan and Post-Construction Monitoring Plan, during which phases the reduction of site risks and achievement of remedial goals are principal objectives. In contrast, INAC feels that during pre-remediation, there are no site activities toward the remedial goals and inclusion in a data report provides minimal value. INAC agrees with the reviewers suggested inclusion of sampling other media and it is INAC's intention to do so during the Post-Construction phases.</p>	Response acceptable
2	General Report	<p><b>Comment</b> The report uses CCME AFW guidelines for metals and water quality and drinking water guidelines for radioactivity for comparison with 2016 values. This doesn't make sense in the case of small streams without</p>	<p><b>June 27:</b> INAC will present the objectives of the water sampling program within the preliminary sections of the report. However, it is noted that site cleanup guidelines will be refined as part of subsequent</p>	INAC will address these comments in a revised report

		<p>aquatic life (e.g., transient drainage streams from water rock piles) or which will not be used for drinking water.</p> <p><b>Recommendation</b> Provide objectives of the water sampling program in the early sections of the report. Express the objectives in terms of site cleanup guidelines or site risk assessments. Sampling adit water probably doesn't make sense except as a source of contamination for local surface water. The report should also provide a performance target for QA/QC of chemical analysis (90% of analyses within QA targets).</p>	<p>monitoring plans (e.g. Construction/Remediation Monitoring Plan and Post-Construction Monitoring Plan) and will be incorporated within these reports. INAC continued monitoring a select number of adit water stations in 2017. However, as suggested by the reviewer, this will be removed in future monitoring campaigns. Wthin the current report, CCME-FAL guideline comparisons were not removed for adit water, though clarification will be added that these comparisons were used to highlight elevated concentrations and not to indicate in-situ risk to aquatic receptors. INAC agrees with the addition of performance targets for QA/QC parameters and will include this in the report revisions.</p>	
3	Abbreviations â€“ Pg vi	<p><b>Comment</b> CARD definition</p> <p><b>Recommendation</b> Correct to: Contaminants and Remediation Directorate. Check other acronyms</p>	<p><b>June 27:</b> Quite recently, the section name has changed from Contaminants and Remediation Directorate to Division.</p>	No comment
4	Page 3	<p><b>Comment</b> The list of analytes.</p> <p><b>Recommendation</b> The analytes should go into a table, preferably with detection limits of the analysis.</p>	<p><b>June 27:</b> A table of analytes with detection limits will be added to the report.</p>	INAC will address these comments in a revised report
5	Page 8 Table 3-1	<p><b>Comment</b> There should be 1 more reference to add to the list - SENES Consultants. June 2010. 2009 Baseline Monitoring Program. We</p>	<p><b>June 27:</b> The report will be added to the list of references.</p>	INAC will address these comments in a revised report



		analysed water as part of the program at Sawmill Bay in 2009. <b>Recommendation</b> Add to list.		
6	Section 5.2.2	<b>Comment</b> “elevated concentrations of some metals in the surface water on site” <b>Recommendation</b> Please provide more details as it helps to interpret results from the 2016 program, which showed exceedances of arsenic, copper, mercury, silver and uranium.	<b>June 27:</b> Additional discussion will be added to clarify the nature of elevated metal concentrations.	INAC will address these comments in a revised report
7	Section 5.3.4 Radionuclides	<b>Comment</b> The report applies drinking water standards to the stream draining the waste rock and the tailings pond. This doesn’t seem appropriate, given the risk models used to calculate the drinking water standard probably don’t apply here. <b>Recommendation</b> Provide justification for drinking water standards in this case. (Is there a radiation exposure/risk model for Contact Lake which is more appropriate?).	<b>June 27:</b> Drinking water standards were applied as a screening tool only, which will be clarified in the report. The Contact Lake Human Health and Ecological Risk Assessment stated that “Radioactive releases from the Contact Lake Mine site do not pose any risk of adverse effects to aquatic biota in any water body on or in the vicinity of the sites.” and “the radiological dose estimates for the hypothetical campers on the Contact Lake Mine site were below the Health Canada “dose constraint” of 300 microS/y”(SENES Consultants Ltd. 2007).	INAC will address these comments in a revised report
8	Table 7-4	<b>Comment</b> Dissolved arsenic is higher than total in a couple of samples. <b>Recommendation</b> Consider ceasing analysing samples for dissolved metal, as the data often aren’t reproducible and CCME guidelines are	<b>June 27:</b> INAC made commitments to conduct dissolved metal analysis at SNP stations to address specific questions by Environment Canada during review of the Draft Water Licence. Where not	Response acceptable

		expressed as total metal.	required under this commitment, INAC will evaluate a reduction/removal of dissolved metal sampling in the future.	
9	Pg 33	<p><b>Comment</b> Total ammonia high in one sample, but not the duplicate.</p> <p><b>Recommendation</b> Please provide rationale for accepting the data of the sample and not discarding the data as inaccurate or an outlier.</p>	<p><b>June 27:</b> INAC concurs that the low ammonia concentration in the duplicate, combined with the other ammonia results from the site, suggest that there is a source of error. This uncertainty will be clarified in the report. During the 2017 sampling program, there were no ammonia exceedances at this location.</p>	INAC will address these comments in a revised report
10	Pg 34	<p><b>Comment</b> “the 2016 site is approximately 15 m further west near a sulphur rich pile than the historic sampling location.” Is there acid generating potential in this pile (presumably waste rock)?</p> <p><b>Recommendation</b> Discuss the possibility of acid generation in terms of water sampling and whether it affects the water chemistry results through time.</p>	<p><b>June 27:</b> The Silver Bear Mine Remedial Action Plan presents the following summary of geochemical considerations at Northrim Mine, “Laboratory tests suggested that there is little potential for acidic conditions to develop in the Northrim waste rock in the future. About half of the waste rock samples had NPR values greater than two, and about one-third of the samples were in the uncertain range between one and two. Three samples had NPR values less than one, and would be designated as potentially acid generating. One of those samples was taken from a naturally mineralized un-mined outcrop, and the other two came from the small waste rock deposit immediately in</p>	INAC will address these comments in a revised report

			<p>front of the mine entrance.” and “The results as a whole show that the Northrim waste rock is currently a source of some metal loadings to the Camsell River although, water quality monitoring data indicated no changes to Camsell River water quality is occurring. The relatively small area of waste rock means that these loadings are not expected to increase the metal concentrations in the river.” (SENES Consultants Ltd., 2008). Notwithstanding this assessment, at any mineralized area there may be small areas which demonstrate anomalous ARD or metal leaching potential. With respect to results of sample NO-5, the pH was slightly alkaline (7.78) and the sulphate concentration (17 mg/L) was approximately consistent with the upstream Camsell River reference station R-4 (15 mg/L). These factors suggest that should any ARD be occurring at this station, the effects aren’t exhibited in the sample. The elevated copper and lead concentration reported in the sample may be the result of suspended solids; however, in the absence of dissolved metal results or total suspended solids, this cannot be confirmed. 2017 sampling results indicated</p>	
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			all Camsell River sample results were below respective guidelines and it is suspected this is a sampling artifact from the disruption of fine grained shoreline materials. This information will be clarified in the report as well.	
11	10.1 Duplicate Samples	<p><b>Comment</b> “Ten blind field duplicate (BFD) sample sets were analyzed for general parameters and RPD values calculated where possible.”</p> <p><b>Recommendation</b> Please specify when RPD conditions apply (only when analytes are 5x the DL?). Specify the number of analytes included in the calculation.</p>	<p><b>June 27:</b> Discussion of the RPD conditions and when applicable will be added to the report, as well as the number of analytes.</p>	INAC will address these comments in a revised report
12	10.1.3 Dissolved Metals	<p><b>Comment</b> Dissolved metal sometimes exceeds total metal but that won't be evaluated from the RPD calculation.</p> <p><b>Recommendation</b> Please provide a brief analysis of data on the percent dissolved relative to total for the 2016 program.</p>	<p><b>June 27:</b> A brief discussion will be added summarizing the general relationship between dissolved and total metal concentrations with respect to QA/QC samples. Further analysis on the 2016 samples will be completed in the Baseline Data Report.</p>	INAC will address these comments in a revised report



June 12, 2018

Bonnie Bergsma  
Regulatory Specialist  
Sahtu Land and Water Board  
Box 1, Fort Good Hope  
Northwest Territories  
X0E 0H0

Dear Ms. Bergsma,

**Re: INAC CARD  
Water Licence – S17L8-002  
Great Bear Lake Sites 2016 Revised Water Quality Monitoring Report  
Request for Review and Comments**

The Department of Environment and Natural Resources (ENR), Government of the Northwest Territories has reviewed the report 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 provides the following comments and recommendations for the consideration of the Board.

### **Topic 1: Trend Analysis**

#### **Comment(s):**

ENR provided comments on Version 1 of the plan on August 15, 2017. Within those comments, ENR recommended that INAC CARD assess any implications of the 2016 results as they related to trend analysis and if there were any issues moving forward in understanding site conditions over time.

In their response, it was noted that INAC CARD will incorporate this recommendation into the 2017 Monitoring Report.

#### **Recommendation(s):**

- 1) ENR will provide comments on the 2017 Monitoring Report upon its submission.

## **Topic 2: Adaptive Management**

### **Comment(s):**

In ENR's comments dated August 15, 2017, it was requested that INAC CARD outline if any closure criteria had been developed for the various Great Bear Lake (GBL) mine sites and if so, if there would be comparisons provided in the future comparing how water quality on-site relates to these values.

In their response, INAC CARD noted that:

*"Site Specific Target Levels (SSTL) for Arsenic were developed for discharge waters from the Terra Mine Ho Hum Tailings Containment Area (TCA) wetland into Moose Bay of the Camsell River. For all other waterbodies, an adaptive management framework will be developed where applicable and detailed within the WQMP, as discussed in response to ENR Comment 2."*

The response to ENR comment 2 indicated that an Adaptive Management Plan will be presented in a Water Quality Monitoring Plan to be applied during and following remediation. As per the SLWB's Staff Report dated August 28, 2017, the Board amended that Water Licence to include Pre-Construction/Baseline Monitoring Report, Construction Monitoring Plan, Post-Construction Monitoring Plan and Long-Term Monitoring Plan. As such, it isn't clear how and when then the adaptive management framework will be developed.

### **Recommendation(s):**

- 1) ENR requests clarification on the timing of development of an adaptive management framework as it relates to the updated Water Licence including requirements for monitoring plans at different phases of the project.

## **Topic 3: Contact Lake Radionuclides**

### **Comment(s):**

ENR had previously asked questions regarding the status of surface water at Contact Lake as it relates to drinking water guidelines for radioactivity and asked clarification if monitoring will continue.

In their response, INAC CARD notes that this recommendation will be incorporated into the 2017 Monitoring Report and Water Quality Monitoring Plan requirements.

**Recommendation(s):**

- 1) ENR will review subsequent submissions as they relate to this topic, when available.

**Topic 4: Temporal Trends****Comment(s):**

ENR had requested that INAC CARD provide additional information (i.e. narratives, figures, etc.) on temporal trends for water quality for parameters of concern at the Terra Mine, Northrim and Norex/Graham Vien.

In response, INAC CARD concurred with this recommendation and noted that it would be incorporated into the 2017 Monitoring Report and Water Quality Monitoring Plan requirements.

**Recommendation(s):**

- 1) ENR will review subsequent submissions as they relate to this topic, when available.

**Topic 5: Revisions Table****Comment(s):**

ENR notes that without doing a detailed cross-reference between the different versions of the report it is difficult to determine which sections have been updated since the last iteration. As such, ENR limited its review to comments provided during the last review period and responses provided by INAC CARD. During the past several years, the Land and Water Boards and proponents have been moving towards the inclusion of a “Revisions Table” for updated versions of Plans at the beginning of the document to assist reviewers in focusing on changes and updates and assist in limiting the scope of the review.

**Recommendation(s):**

- 1) ENR recommends the Board include a request for revisions tables in future plans.

## Topic 6: 2017 Monitoring Report

### Comment(s):

As noted above, there were several references to future information being provided in the “2017 Monitoring Report”. ENR has reviewed Water Licence S17L8-002 and isn’t clear as to submissions dates or requirements related to this report.

### Recommendation(s):

- 1) ENR requests that INAC CARD clarify the submission date and Water Licence requirements related to the “2017 Monitoring Report” referenced in their responses.

Comments and recommendations were provided by ENR technical experts in the Water Resources Division and the Sahtu Region and were coordinated and collated by the Environmental Assessment and Monitoring Section (EAM), Conservation, Assessment and Monitoring (CAM).

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](mailto:patrick.clancy@gov.nt.ca).

Sincerely,



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