

Review Comment Table

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| Board: | WLWB |
| Review Item: | Adamera - Application for Land Use Permit - Camp and Fuel Storage for Mineral Exploration (W2015C0002) |
| File(s): | W2015C0002 |
| Proponent: | Adamera Minerals Corp |
| Document(s): | Land Use Permit Application (2 MB) Closure and Reclamation Plan (0.5 MB) Engagement Plan - Version 1.0 (0.5 MB) Spill Contingency Plan - Version 2.0 (1.8 MB) Waste Management Plan - Version 1.0 (2.3 MB) Draft Land Use Permit (0.5 MB) |
| Item For Review Distributed On: | Feb 20 at 14:57 Distribution List |
| Reviewer Comments Due By: | Mar 11, 2015 |
| Proponent Responses Due By: | Mar 17, 2015 |
| Item Description: | <p>Adamera Minerals Ltd. has submitted a Land Use Permit application for a camp and fuel storage on the shore of Hepburn Lake. The camp and fuels would support the proposed mineral exploration for Iron Oxide Copper Gold deposits at the seven lease areas identified in the application. Exploration activities would include prospecting, mapping, and possible ground geophysics. Drilling is not planned by the proponent and has therefore not been included in the scope of the Draft Permit. Adamera Minerals Ltd. was previously permitted to conduct mineral exploration in this area under Permit W2009C0003.</p> <p>Together with this application, Adamera has also submitted its:</p> <ul style="list-style-type: none"> • Engagement Plan, Version 1.0; • Waste Management Plan, Version 1.0; • updated an version of its Spill Contingency Plan (Version 2.0); and, • Closure and Reclamation Plan for the camp and fuel cache site. |

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| Contact Information: | <p>A draft Land Use Permit has been developed using the current MVLWB Standard Land Use Permit Conditions. The purpose of this draft Land Use Permit is to allow parties to comment on Board staff's suggested conditions. These draft materials are not intended to limit in any way the scope of parties' comments. The Board is not bound by the contents of the draft Permit and will make its decision at the close of the proceeding on the basis of all the evidence and arguments filed by all parties.</p> <p>For renewal applications to be exempt from preliminary screening, the requested activities must have previously undergone the screening/assessment process as required by Part 5 of the MVRMA. WLWB staff believe this application is exempt from preliminary screening as the proposed activities were screened on February 23, 2009.</p> <p>The WLWB encourages reviewers to ask questions and provide comments and recommendations on the content of this Land Use Permit application, associated management plans, and the draft Land Use Permit conditions.</p> |
| Contact Information: | <p>Elissa Berrill 867-765-4581 Roberta Judas 867-713-2500</p> |

Comment Summary

| Environment Canada: Melissa Pinto | | | | |
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| ID | Topic | Reviewer Comment/Recommendation | Proponent Response | Board Staff Response |
| 1 | General File | Comment (doc) EC Comment Letter Recommendation | | |
| 2 | General File | Comment (doc) Table 1 Recommendation | | |
| 3 | Migratory Birds | Comment EC is responsible for implementing the Migratory Birds Convention Act, which provides for the protection of migratory birds through the Migratory Birds Regulations, and to develop and implement policies and regulations to ensure the protection of migratory birds, their eggs, and their nests. Paragraph 6(a) of the Migratory Bird Regulations states that no | Mar 18: Acknowledged. Adamera Minerals is committed to complying with all regulations regarding Migratory Birds and their nests. | Board staff acknowledge Adamera's commitment to remain in compliance with the Migratory Birds Convention Act. |

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| | <p>one shall disturb or destroy the nests or eggs of migratory birds. Migratory birds, the nests of migratory birds and/or their eggs can be inadvertently harmed or disturbed as a result of many activities including but not limited to clearing trees and other vegetation, draining or flooding land, or using fishing gear. The inadvertent harming, killing, disturbance or destruction of migratory birds, nests and eggs is known as incidental take. Incidental take, in addition to harming individual birds, nests or eggs, can have long-term consequences for migratory bird populations in Canada, especially through the cumulative effects of many different incidents. Currently the regulations do not provide for authorizations or permits for the incidental take of migratory birds or their nests or eggs in the course of industrial or other activities. As such, to minimize the possibility of contravening the law, taking reasonable care, and avoidance are the best approaches to take when contemplating any activity or decision that has the potential to impact migratory birds, nests or eggs. Proponents are responsible for taking appropriate measures to ensure that they comply with the legislation and regulations.</p> <p>Recommendation To prevent detrimental effects on migratory birds, nests and eggs and help maintain sustainable populations of migratory birds, EC recommends that the Proponent know their legal obligations; avoid engaging in potential destructive or disruptive activities in key sensitive periods and locations; and develop and implement appropriate preventative and mitigation measures to minimize the risk of incidental take. It is important to note that breeding periods may vary from year to year due to</p> | | |
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| | | <p>climatic conditions and some species may nest outside the dates provided, if conditions are favourable. Migratory birds may be found nesting from the beginning of May until mid-August. This general nesting period covers most federally protected migratory bird species and may not include the complete nesting period for species under territorial jurisdiction (such as jays, owls, hawks and blackbirds). If nests containing eggs or young of migratory birds are located or discovered, all disruptive activities in the nesting area should be halted until nesting is completed. Any nest found should be protected with a buffer zone appropriate for the species and the surrounding habitat until the young have naturally left the vicinity of the nest. Moreover, if there are migratory bird nests where work is proposed, options like avoiding, adapting, rescheduling or relocating activities that could disturb or destroy the nests should be considered. For further information on how to protect migratory birds and their nests and eggs when planning or carrying out project activities, consult EC's Incidental Take web page and the fact sheet: Planning Ahead to Reduce the Risk of Detrimental Effects to Migratory Birds, and their Nests and Eggs at: www.ec.gc.ca/paom-itmb/.</p> | | |
| 4 | Migratory Birds | <p>Comment EC notes that the project will include a camp.</p> <p>Recommendation EC recommends that food, domestic wastes, and petroleum-based chemicals (e.g., greases, gasoline, glycol-based antifreeze) be made inaccessible to wildlife at all times. Such items can attract predators of migratory birds such as foxes, ravens, gulls, and bears. Although these animals may initially be attracted to the novel food sources, they often will</p> | <p>Mar 18: Acknowledged. Steps will be taken to ensure food, domestic waste and other animal attractants will be inaccessible to wildlife and odours minimized before being back hauled to Yellowknife for disposal or recycling at an approved facility.</p> | <p>Adamera's Waste Management Plan identifies how it will manage all identified camp wastes. The standard conditions in the Draft LUP include conditions for the proper</p> |

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| | | also eat eggs and young birds in the area. These predators can have significant negative effects on the local bird populations. | | Fuel Storage and Waste Management. |
| 5 | Species at Risk | <p>Comment EC notes that the project falls within the historical range of the Eskimo Curlew.</p> <p>Recommendation Eskimo Curlew is designated as Endangered and listed on Schedule 1 of the Species at Risk Act. There have been no confirmed sightings of Eskimo Curlew since 1963, and no unconfirmed sightings on the breeding grounds since 1992. The National Recovery Team for this species has determined that recovery is not feasible at this time. It is EC's view that, in light of its current status, there is no need for further action with respect to Eskimo Curlew. An appropriate mitigation and monitoring plan should be developed with the Proponent if it is established that this species does occur in the area.</p> | Mar 18: Acknowledged. | No Board staff comment required. |
| 6 | Species at Risk | <p>Comment The following comments are pursuant to the Species at Risk Act (SARA). SARA is directed towards preventing wildlife species from becoming extinct or lost from the wild, helping in the recovery of species that are at risk as a result of human activities, and promoting stewardship. The killing, harming or harassing of listed species; the damage and destruction of their residences; and the destruction of critical habitat is prohibited under SARA. The prohibitions apply to all Threatened, Endangered and Extirpated species listed on Schedule 1 of SARA on federal lands and to Migratory Birds (as defined under the Migratory Birds Convention Act) and aquatic species (as defined under the Fisheries Act) everywhere they are found. Subsection 79(2) of SARA, states that during an assessment of a project, the</p> | Mar 18: Acknowledged. Adamera field employees and contractors will be made aware of and will implement mitigation measures for species at risk that may be encountered. Any sightings will be recorded on the NWT Wildlife Sightings Log and a complete list will be submitted to the GNWT Department of Environment and Natural Resources at the end of each field season. | Board staff acknowledge Adamera's commitment to implement the mitigation measures recommended by Environment Canada. Board staff encourages Adamera to continue its communication with Environment Canada on wildlife-related issues. |

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| | <p>adverse effects of the project on listed wildlife species and their critical habitat must be identified, that measures are taken to avoid or lessen those effects, and that the effects need to be monitored. This subsection applies to all species listed on Schedule 1 of SARA. However, as a matter of best practice, EC suggests that similar consideration be given to species on other Schedules of SARA and under consideration for listing on SARA, including those designated as "at risk" by the Committee on the Status of Endangered Wildlife in Canada (COSEWIC). Table 1 (see attached) lists species that may be encountered in the project area that have been designated as at risk by COSEWIC as well as their current listing on Schedules 1, 2 and 3 of SARA (and designation if different from that of COSEWIC). This list may not include all species identified as at risk by the Territorial Government. It does not include aquatic species, which are under the responsibility of Fisheries and Oceans Canada. Project impacts could include species disturbance, attraction to operations, and destruction of habitat.</p> <p>Recommendation For any Species at Risk that could be encountered or affected by the project, the Proponent should note any potential adverse effects of the project to the species, its habitat, and/or its residence. All direct, indirect, and cumulative effects should be considered. Refer to species status reports and other information on the Species at Risk registry at www.sararegistry.gc.ca for information on specific species as well as the booklet Species at Risk in the Northwest Territories (2014 Edition) available at www.nwt-species-at-risk.com/en/Documents. As new species may have been assessed by COSEWIC or added to Schedule 1 of SARA since the booklet was last</p> | | |
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| | | <p>published, Proponents should always check the Species at Risk registry to obtain the most current information. If Species at Risk are encountered or affected, the primary mitigation measure should be avoidance. The Proponent should avoid contact with or disturbance to each species, its habitat and/or its residence. Monitoring should be undertaken by the Proponent to determine the effectiveness of mitigation and/or identify where further mitigation is required. As a minimum, this monitoring should include recording the locations and dates of any observations of Species at Risk, behaviour or actions taken by the animals when project activities were encountered, and any actions taken by the Proponent to avoid contact or disturbance to the species, its habitat, and/or its residence. This information should be submitted to the appropriate regulators and organizations with management responsibility for that species, as requested. The Territorial Government should be consulted to identify other appropriate mitigation and/or monitoring measures to minimize project effects to species under their management responsibility. Mitigation and monitoring measures must be taken in a way that is consistent with applicable species at risk recovery strategies and action/management plans.</p> | | |
| 7 | Wildlife | <p>Comment Implementation of these recommendations may help to reduce or eliminate some effects of the project on migratory birds and Species at Risk, but will not necessarily ensure that the proponent remains in compliance with the Migratory Birds Convention Act, Migratory Birds Regulations, and the Species at Risk Act. The Proponent must ensure they remain in compliance during all phases and in all undertakings</p> | <p>Mar 18: Acknowledged.</p> | <p>No Board staff comment required.</p> |

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| | | related to the project. Recommendation Comment is for Proponent's information. | | |
| 8 | Wildlife | <p>Comment The Canadian Wildlife Service (CWS) of EC is interested in observations of birds, especially observations of birds identified as Species at Risk or of species occurring outside their known ranges. Since 1995 CWS has been collecting observations on northern birds through its Northwest Territories and Nunavut Bird Survey Checklist program. This program relied on the assistance of hundreds of volunteers to submit their bird observations throughout the territories. Over the past 2 decades CWS has collected >100,000 observations of over 20 million individuals birds. The checklist program is the first to provide wide-scale information on northern bird populations. In 2012, CWS integrated the Northwest Territories and Nunavut Bird Checklist Survey program into eBird and we plan to use eBird as the main database for northern bird observations going forward. Given that there are few observations for remote locations in the Northwest Territories and Nunavut, especially in the eBird database, it would be invaluable for project location data to be included.</p> <p>Recommendation To submit data to eBird, an account must be created. Visit www.eBird.org and register as a new user. If you have any questions about the program or uploading your data to eBird, contact the NWT/Nunavut Bird Checklist program at NWTchecklist@ec.gc.ca.</p> | Mar 18: Acknowledged. | Board staff encourage Adamera to participate in CWS Northwest Territories and Nunavut Bird Survey, as is appropriate. |
| 9 | Spill Contingency Plan | Comment Pg 6 of the Spill Contingency Plan, under Regulatory Bodies, indicates an incorrect EC environmental emergency contact. | Mar 18: This contact information has been updated and the revised Spill Contingency | Board staff anticipates submission of an updated Spill Contingency Plan, |

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| | | <p>Recommendation For information relating to the environmental enforcement and reporting requirements under the Canadian Environmental Protection Act, 1999 and the Fisheries Act please contact the EC Environmental Enforcement 24 Hour Duty Officer at 780-499-2432. EC also has a National Environmental Emergencies Centre (NEEC) whose primary role is to provide technical and scientific environmental advice and assistance to the lead agency, in the event of an environmental emergency. A lead agency is described as the governmental authority that regulates or has authority over the activity from which the emergency originated. EC helps to identify the environmental protection priorities and provide advice on ways to reduce the pollution's impact on the environment. This advice can include weather forecasts, location of wildlife and sensitive ecosystems, and expertise on spill counter-measure and remediation options. NEEC can be contacted at 849-997-2800.</p> | <p>Plan will be submitted before the commencement of operations.</p> | <p>prior to commencement of operations in 2015, for a conformity check.</p> |
| 10 | Spill Contingency Plan | <p>Comment Pg 9 of the Spill Contingency Plan, under Spills on Water, indicates that booms (containment and sorbent) should be used. On pg 10 of the Spill Contingency Plan, under Resource Inventory, booms are not listed.</p> <p>Recommendation EC recommends that booms (containment and sorbent) be added to the spill kit and be listed in the Spill Contingency Plan under Resource Inventory. EC also recommends that a copy of the Spill Contingency Plan be available on all sites where fuel and/or hazardous materials are stored.</p> | <p>Mar 18: The oversight on P.10 has been corrected to include booms, as are listed in Appendix III - Spill Kit Contents. The revised Spill contingency Plan will be submitted before the commencement of operations.</p> | <p>Board staff anticipates submission of an updated Spill Contingency Plan, prior to commencement of operations in 2015, for a conformity check.</p> |

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| 11 | Spill Contingency Plan | <p>Comment Subsection 36(3) of the Fisheries Act states that, unless authorized by federal regulation, no person shall deposit or permit the deposit of any deleterious substances of any type in water frequented by fish, or in any place under any conditions where the deleterious substance may enter any such water. The legal definition of deleterious substance, as outlined in Section 34(1) of the Fisheries Act, includes any substance with a potentially harmful chemical, physical or biological effect on fish or fish habitat.</p> <p>Recommendation The following prevention/mitigation recommendations are made with respect to the transportation, storage, use and disposal of petroleum products and hazardous substances which, when employed, may minimize the risk of chronic and accidental spills and their impacts to the environment. The use of secondary containment with an impervious liner, such as self-supporting insta-berms, is recommended for storage of all barrelled fuel rather than relying on natural depressions to contain spills. Fuel storage areas should be lined with an impervious liner as a preventative measure against potential future soil and groundwater contamination from fuel spills. Extra precaution in the installation of liners is strongly recommended since the integrity of the liner is key to preventing leaks. As for the bermed area requirements, the standard requirement is for 110% of the largest container, OR, if there are multiple containers: 100% of the largest container plus 10% of the cumulative volume of all the other containers combined. The fuel caches should be inspected on a regular basis and appropriate spill response equipment and clean-up materials (absorbents, containment</p> | <p>Mar 18: Acknowledged. Fuel cache will have secondary containment.</p> | <p>Conditions included in the Draft LUP regulate fuel storage and ensure secondary containment is used during storage and re-fuelling activities.</p> |
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| | | devices, etc.) must be on hand during any transfer of fuel or hazardous substances and at vehicle-maintenance areas. | | |
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| 12 | Waste Disposal | <p>Comment While conducting background research on the project, EC noticed discrepancies between the Waste Management Plan and the Safety Manual uploaded onto the Public Registry.</p> <p>Recommendation EC recommends that the Proponent update the Safety Manual to reflect relevant content from the approved Waste Management Plan and other approved management plans, as applicable, to maintain consistency.</p> | <p>Mar 18: The Safety Manual will be updated and re-submitted before the commencement of operations.</p> | Acknowledged. |
| GNWT - Environment and Natural Resources: Central Email GNWT | | | | |
| ID | Topic | Reviewer Comment/Recommendation | Proponent Response | Board Staff Response |
| 11 | General File | <p>Comment (doc) ENR letter with Comments and Recommendations</p> <p>Recommendation</p> | | |
| 1 | Topic 1: Storage, Handling and Disposal of Refuse or Sewage | <p>Comment Comment(s): A Waste Management Plan (WMP) should provide additional details for the methods that will be used for procedures implemented onsite in regards to segregation, storage, treatment, transfer and disposal of wastes, amount of waste generated, contingencies measures, and staff training. Adamera has submitted a WMP for review and ENR has the following recommendations for terms and conditions are suggested to help ensure the protection of project staff or clients and also to protect wildlife within their natural habitat by reducing or preventing human/bear conflicts that could lead to the destruction of nuisance bears.</p> <p>Recommendation Recommendation(s): 1) The Permittee shall use food handling as well as garbage</p> | <p>Mar 18: Acknowledged.</p> | <p>Adamera's Waste Management Plan identifies how it will manage all identified camp wastes. Board staff anticipates submission of an updated Waste Management Plan, prior to commencement of operations in 2015, for a conformity check.</p> <p>The standard conditions in the Draft LUP include</p> |

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| | | collection, transfer, storage and disposal procedures that minimize wildlife attraction. | | conditions for the proper Waste Management. |
| 2 | None | Comment None Recommendation 2) The Permittee shall keep all waste, cleaned recyclables and debris in a central area within sealed animal proof metal containers until final disposal. | Mar 18: Acknowledged. | See response to ENR-1 |
| 3 | None | Comment None Recommendation 3) The Permittee shall ensure that the sealed animal proof metal containers are cleaned once emptied. | Mar 18: Acknowledged. | See response to ENR-1 |
| 4 | None | Comment None Recommendation 4) The Permittee shall remove all non-combustible and cleaned recyclables and debris, from the land use area, to an approved waste disposal site. | Mar 18: Acknowledged. | See response to ENR-1 |
| 5 | None | Comment None Recommendation 5) The Permittee shall ensure that all grease and oils from the exploration activities/camp are stored in a manner that reduces the release of odours and prevents wildlife from accessing the attractants. | Mar 18: Acknowledged. | Fuel storage is regulated by the standard conditions included in Draft LUP. |
| 6 | None | Comment None Recommendation 6) The Permittee shall remove scrap metal, discarded machinery parts, tires, drums to an approved waste disposal facility. | Mar 18: Acknowledged. | See response to ENR-1 |
| 7 | None | Comment None Recommendation 7) The Permittee shall ensure that any residue, if incinerating, is disposed of in a manner that will not attract wildlife | Mar 18: Acknowledged. | See response to ENR-1 |

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| 8 | Topic 2: Protection of Wildlife and Fish Habitat | <p>Comment Comment(s): There has been a growing concern over the protection of wildlife and wildlife habitat on project footprints. Adamera has not attached a Wildlife & Wildlife Habitat Protection Plan (WWHPP) that addresses aspects of Wildlife protection on the property. A WWHPP outline in more detail the standard operating procedures (SOPs) deemed necessary to protect on-site personnel, wildlife and wildlife habitat within the project footprint, including the use of road/trail access and wildlife monitoring. The WWHPP would be developed in a manner that would be appropriate to the location, scope and size of the project.</p> <p>Recommendation Recommendation(s): 1) The Permittee shall submit a Wildlife & Wildlife Habitat Protection Plan (WWHPP) annually to regulatory agencies for review to ensure that damage to wildlife and wildlife habitat within the project footprint including use of new and existing access roads/trails are minimized.</p> | <p>Mar 18: A Wildlife and Wildlife Habitat Protection Plan will be submitted before the commencement of operations.</p> | <p>Acknowledged.</p> |
| 9 | Topic 3: Establishment of Petroleum Fuel Storage Facilities | <p>Comment Comment: Ensure provisions are in place for appropriate storage of fuel and disposal fuel contaminated materials. Ensure mitigative measures are in place in the event of spills of any hazardous materials and reduce the release of contaminated materials. Adamera has submitted a Spill Contingency Plan for review and ENR has the following comments and recommendations to help ensure provisions are in place for appropriate storage of fuel and disposal fuel contaminated materials. Ensure mitigation measures are in place in the event of spills of any hazardous materials and reduce the release of contaminated materials.</p> <p>Recommendation Recommendation(s): 1) The</p> | <p>Mar 18: Acknowledged. A revised Spill Contingency Plan which addresses secondary containment, a site map, contact information for the site manager, staff training and disposal of waste oils, filters, etc. will be submitted before the commencement of operations.</p> | <p>See Board staff response to EC-10.</p> |

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| | | Permittee shall submit a revised Spill Contingency Plan to regulatory agencies for approval and implementation prior to commencement of operations which enact measures that minimize the release of contaminants and mitigate potential spills, including the establishment of designated fuel storage and refueling areas that are: Stored within a secondary containment (i.e. berm, impermeable liner, double walled tank, etc.); Site map(s) with fuel storage and transfer areas clearly identified; 24 hours contact information for site manager (once available); Staff training; and Report all spills immediately to the 24 hour Spill Report Line (867) 920-8130, which is in accordance with instructions contained in "Spill Report" form N.W.T. 1752/0593. | | |
| 10 | None | Comment None Recommendation 2) The Permittee shall ensure any waste oils, including used filters, oily rags, used drums and contaminated soils are removed from site and disposed of at an approved facility. | Mar 18: See above. | See Board staff response to ENR-1 |
| GNWT - Lands: Erin Anderson | | | | |
| ID | Topic | Reviewer Comment/Recommendation | Proponent Response | Board Staff Response |
| 1 | General File | Comment (doc) Recommendations from Department of Lands for issuance of LUP. Recommendation | | |
| GNWT - Lands: Joseph Heron | | | | |
| ID | Topic | Reviewer Comment/Recommendation | Proponent Response | Board Staff Response |
| 1 | Conditions | Comment Inspectors reviewed the Draft LUP and there are no issues with the document as written. Recommendation Inspectors recommend the use of the LUP and its conditions as written. | | Acknowledged. |

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| 2 | Spill Contingency Plan | <p>Comment On page 6 of the Spill Contingency Plan, the Regulatory Bodies: section contains old contact information for the NWT. It reads "Department of Indian and Northern Development - Yellowknife: (867) 920-8240.</p> <p>Recommendation Update GNWT contact information to read: Government of the Northwest Territories Department of Lands - North Slave Region (867) 765-6648</p> | <p>Mar 18: This contact information has been updated and the revised Spill Contingency Plan will be submitted before the commencement of operations.</p> | See Board staff response to EC-10. |
| 3 | Waste Management Plan | <p>Comment Section 4.0: INFRASTRUCTURE REQUIRED FOR WASTE MANAGEMENT - <i>Incinerator</i> Combustible, non-hazardous waste will be incinerated daily in a modified burn barrel...</p> <p>Recommendation As a modified burn barrel is to be used onsite for incineration of wastes, Inspectors deem that only cardboard and lumber may be incinerated onsite. The <i>Waste Management Plan</i> must be updated to reflect acceptable practices</p> | <p>Mar 18: This section of the Waste Management Plan has been revised and will be re-submitted. Food waste will not be incinerated but properly contained and stored so as not to attract wildlife before being back hauled to Yellowknife for disposal at an approved facility.</p> | See Board staff response to ENR-1. |

WLWB: Elissa Berrill

| ID | Topic | Reviewer Comment/Recommendation | Proponent Response | Board Staff Response |
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| 1 | Engagement Plan - Communicating with affected parties - community meetings | <p>Comment Section 3.4 of the Board's Engagement Guidelines requires the proponent to "allow opportunities for, when appropriate, community meetings to take place to be inclusive of perspectives from all sectors of the community" (bullet 4). Adamera's Engagement Plan Triggers Table identifies letters, emails, and phone calls as formats of engagement; it has not included community meetings as a format of engagement.</p> <p>Recommendation Confirm that Adamera is available for community/in-person meetings, as appropriate.</p> | <p>Mar 18: Adamera is committed to conducting ongoing engagement and will allow for opportunities, when appropriate, for community meetings. The Engagement Plan will be revised and re-submitted before the commencement of operations.</p> | Board staff recommends that Adamera include this commitment in its triggers table, and submit an updated Engagement Plan, for a conformity check, prior to commencement of operations in 2015. |

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| 2 | Engagement Plan - conflict resolution process | <p>Comment Bullet 5 in Section 3.4 of the Board's Engagement Guidelines reads "ensure the proponent has procedures in place to understand and respond to issues as they arise."</p> <p>Recommendation Provide details on the dispute resolution process which would be followed in the event that an issue or conflict arises.</p> | <p>Mar 18: In the event of a conflict arising with a planned activity, Adamera will consult the concerned party and other applicable stakeholders to fully understand and identify the issue. Where appropriate, the plan could then be modified to incorporate the feedback of the concerned party, and be re-submitted for review and comment before the plan is put into action. The engagement process is ongoing throughout the life of the project, and Adamera welcomes participation in the planning process.</p> | <p>Board staff recommends that Adamera include its conflict resolution plan in its Engagement Plan, and submit an updated version, for a conformity check, prior to commencement of operations in 2015.</p> |
| 3 | Waste Management Plan and Security - Total number of structures | <p>Comment The size and number of structures listed in Section 1.7 of Adamera's Waste Management Plan, under the heading "structures" does not match the details provided in the paragraph above this list, or those details included in the LUP application. Structures are considered when calculating total security for a Project.</p> <p>Recommendation Provide a list of all structures on site and the approximate area of each structure in square meters.</p> | <p>Mar 18: 6 plywood floored canvas tents (3 sleep tents, one kitchen, 1first aid/dry, 1 office/storage), each approximately 20.8 square metres, 1 outhouse approximately 1.5 square metres, 1 generator shack approximately 2.2 square metres. The Waste Management Plan has been revised to list all structures and their size and will be re-submitted before the commencement of operations.</p> | <p>Acknowledged.</p> |
| 4 | Waste Management Plan - Incineration | <p>Comment Section 3.4.7 of the Board's Guidelines for Developing a Waste Management Plan specify the details to be provided with respect to use of an incinerator onsite. Adamera has provided design drawings of the type of incinerator to be used, and explained that all ash will be removed from site.</p> <p>Recommendation Provide details on how Adamera will store ash on site, prior to removal and disposal at an approved facility.</p> | <p>Mar 18: Ash will be collected and barreled until being transported to Yellowknife for disposal at an approved facility.</p> | <p>Board staff recommends Adamera include this information in its Waste Management Plan.</p> <p>See Board staff response to ENR-1.</p> |



Environment Canada Environnement
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Environmental Protection Operations Directorate (EPOD)
Prairie & Northern Region (PNR)
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Yellowknife, NT X1A 2P7

March 11, 2015

EC File: 5100 000 056/001
WLWB File: W2015C0002

Elissa Berrill
Regulatory Specialist
Wek'eezhii Land and Water Board
1-4905 48th Street
Yellowknife, NT X1A 3S3

Via online submission

**RE: W2015C0002 – Adamera Minerals Ltd. – Hepburn Camp and Fuel Storage –
Type A Land Use Permit Application**

Attention: Elissa Berrill

Environment Canada (EC) has reviewed the information submitted to the Wek'eezhii Land and Water Board (WLWB) regarding the above-mentioned project and is submitting comments via the online review system as requested by the WLWB. 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*.

Should you require further information, please do not hesitate to contact me at (867) 669-4733 or Melissa.Pinto@ec.gc.ca.

Sincerely,

Melissa Pinto
Environmental Assessment Coordinator

Attachments: EC comments Excel Sheet, Table 1

cc: Loretta Ransom, Senior Environmental Assessment Coordinator, PNR-EPOD
Dave Fox, A/Head, Environmental Assessment North (NT and NU), PNR-EPOD

Canada

www.ec.gc.ca

Table 1. Species at Risk That May Be Encountered – Hepburn Lake Camp

| Terrestrial Species at Risk¹ | COSEWIC Designation | SARA Status | Government Organization with Primary Management Responsibility² | Recovery Strategy, Action Plan or Management Plan posted on the Species at Risk Public Registry |
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| Eskimo Curlew | Endangered | Schedule 1, Endangered | EC | Recovery Strategy - Final |
| Peregrine Falcon (<i>anatum-tundrius</i> complex) | Special Concern | Schedule 1, Special Concern | GNWT | |
| Short-eared Owl | Special Concern | Schedule 1, Special Concern | GNWT | |
| Grizzly Bear (Western population) | Special Concern | No Status | GNWT | |
| Wolverine | Special Concern | No Status | GNWT | |
| <p>Notes:</p> <p>¹ Fisheries and Oceans Canada has responsibility for aquatic species.</p> <p>² Environment Canada (EC) has a national role to play in the conservation and recovery of Species at Risk in Canada, as well as responsibility for management of birds described in the <i>Migratory Birds Convention Act</i> (MBCA). Day-to-day management of terrestrial species not covered in the MBCA is the responsibility of Government of the Northwest Territories (GNWT). Populations that exist in National Parks are managed under the authority of the Parks Canada Agency.</p> | | | | |

March 11, 2015

Roberta Judas
Regulatory Specialist
Wekeezhii Land and Water Board
#1-4905 48th Street
Yellowknife, NT
X1A 3S3

Dear Ms. Judas,

**Re: Adamera Minerals Corp.
 Land Use Permit Application – W2015C0002
 Camp and Fuel Storage for Mineral Exploration
 Request for Comment**

The Department of Environment and Natural Resources (ENR), Government of the Northwest Territories, has reviewed the project at reference based on its mandated responsibilities under the *Environmental Protection Act*, the *Forest Management Act*, the *Waters Act*, the *Forest Protection Act* and the *Wildlife Act* and provides the following comments and recommendations for the consideration of the Board.

Topic 1: Storage, Handling and Disposal of Refuse or Sewage

Comment(s):

A Waste Management Plan (WMP) should provide additional details for the methods that will be used for procedures implemented onsite in regards to segregation, storage, treatment, transfer and disposal of wastes, amount of waste generated, contingencies measures, and staff training.

Adamera has submitted a WMP for review and ENR has the following recommendations for terms and conditions are suggested to help ensure the protection of project staff or clients and also to protect wildlife within their natural habitat by reducing or preventing human/bear conflicts that could lead to the destruction of nuisance bears.

Recommendation(s):

- 1) The Permittee shall use food handling as well as garbage collection, transfer, storage and disposal procedures that minimize wildlife attraction.
- 2) The Permittee shall keep all waste, cleaned recyclables and debris in a central area within sealed animal proof metal containers until final disposal.
- 3) The Permittee shall ensure that the sealed animal proof metal containers are cleaned once emptied.
- 4) The Permittee shall remove all non-combustible and cleaned recyclables and debris, from the land use area, to an approved waste disposal site.
- 5) The Permittee shall ensure that all grease and oils from the exploration activities/camp are stored in a manner that reduces the release of odours and prevents wildlife from accessing the attractants.
- 6) The Permittee shall remove scrap metal, discarded machinery parts, tires, drums to an approved waste disposal facility.
- 7) The Permittee shall ensure that any residue, if incinerating, is disposed of in a manner that will not attract wildlife

Topic 2: Protection of Wildlife and Fish Habitat

Based on past and current knowledge of the distribution and movement of the barren ground caribou around the area, there is a very high possibility that the Bluenose East caribou herd will use this area during the summer and fall distribution during the proposed period of operation between July 1st to September 30th.

Comment(s):

There has been a growing concern over the protection of wildlife and wildlife habitat on project footprints. Adamera has not attached a Wildlife & Wildlife Habitat Protection Plan (WWHPP) that addresses aspects of Wildlife protection on the property.

A WWHPP outline in more detail the standard operating procedures (SOPs) deemed necessary to protect on-site personnel, wildlife and wildlife habitat within the project footprint, including the use of road/trail access and wildlife monitoring. The WWHPP would be developed in a manner that would be appropriate to the location, scope and size of the project.

Recommendation(s):

- 1) The Permittee shall submit a Wildlife & Wildlife Habitat Protection Plan (WWHPP) annually to regulatory agencies for review to ensure that damage to wildlife and wildlife habitat within the project footprint including use of new and existing access roads/trails are minimized.

Topic 3: Establishment of Petroleum Fuel Storage Facilities

Comment:

Ensure provisions are in place for appropriate storage of fuel and disposal fuel contaminated materials. Ensure mitigative measures are in place in the event of spills of any hazardous materials and reduce the release of contaminated materials.

Adamera has submitted a Spill Contingency Plan for review and ENR has the following comments and recommendations to help ensure provisions are in place for appropriate storage of fuel and disposal fuel contaminated materials. Ensure mitigation measures are in place in the event of spills of any hazardous materials and reduce the release of contaminated materials.

Recommendation(s):

- 1) The Permittee shall submit a revised Spill Contingency Plan to regulatory agencies for approval and implementation prior to commencement of operations which enact measures that minimize the release of contaminants and mitigate potential spills, including the establishment of designated fuel storage and refueling areas that are:
 - Stored within a secondary containment (i.e. berm, impermeable liner, double walled tank, etc.)
 - Site map(s) with fuel storage and transfer areas clearly identified;
 - 24 hours contact information for site manager (once available);
 - Staff training; *and*
 - Report all spills immediately to the 24 hour Spill Report Line (867) 920-8130, which is in accordance with instructions contained in "Spill Report" form N.W.T. 1752/0593.
- 2) The Permittee shall ensure any waste oils, including used filters, oily rags, used drums and contaminated soils are removed from site and disposed of at an approved facility.

Comments and recommendations were provided by ENR technical experts in the North Slave Region and were coordinated and collated by the Environmental Impact Assessment Section, Conservation, Assessment and Monitoring Division (CAM).

If you have any questions or concerns, please do not hesitate to contact me at 920-6118 or patrick_clancy@gov.nt.ca

Sincerely,

A handwritten signature in black ink, appearing to read 'P. Clancy', written in a cursive style.

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



March 10, 2015

Elissa Berrill
Wek'èezhìi Land & Water Board
P.O. Box 32]
Wek'èezhìi, NT X0E 1W0

Dear Ms. Berrill:

Land Use Permit Application: W2015C0002 – Adamera Minreals Corp.
Type of Operation: Camp and Fuel Storage for Mineral Exploration
Location: Hepburn Lake

The Government of the Northwest Territories (GNWT) reviewed Land Use Permit Application W2015C0002 and recommends that the permit be granted.

On March 9, 2015, our Inspector Joe Heron, provided his comments and recommendations for your consideration, via the LWB Online Review System.

Comments received from the Lands Administration Division and the Mining Recorders Office indicate no concerns.

Thank you for the opportunity to comment on this application. Should you have any questions or concerns regarding our comments, please contact our Inspector(s), Clint Ambrose, at (867) 765-6648, or Joe Heron, at (867) 765-6684.

Sincerely,

Scott Stewart
Regional Superintendent
North Slave Region

c. North Slave Region - Yellowknife

SS/eka

Elissa Berrill

From: Elissa Berrill <eberrill@wlwb.ca>
Sent: March 19, 2015 08:45
To: eberrill@wlwb.ca
Subject: FW: Submission of LUP for Hepburn Property

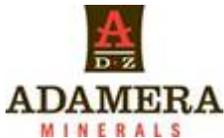
From: Zoe Pratt <z.pratt@adamera.com>
Sent: Wednesday, February 11, 2015 4:38 PM
To: Ryan Fequet (rfequet@wlwb.ca); Clint Ambrose (Clint_Ambrose@gov.nt.ca)
Subject: Submission of LUP for Hepburn Property

Good afternoon Ryan and Clint,

I have just uploaded Adamera's Land Use Permit Application to the Online Review System FTP submission site. Two paper copies of the application will be mailed to the WLWB office. The cheque to cover the Application fee was mailed to Ryan Fequet at the WLWB on January 22. Please let me know if you need any further information.

Best Regards,
Zoe

Zoë Pratt
GIS Manager
Adamera Minerals Corp.



ADZ – TSX Venture

Tel: 604 689-2010
Fax: 604 484-7143
Email: z.pratt@adamera.com