

## Review Comment Table

<b>Board:</b>	WLWB
<b>Review Item:</b>	Platinum Group Metals - Application for Land Use Permit - Camp and Fuel Storage for Mineral Exploration (W2015C0008)
<b>File(s):</b>	<a href="#">W2015C0008</a>
<b>Proponent:</b>	Platinum Group Metals
<b>Document(s):</b>	<a href="#">LUP Application</a> (252 KB) <a href="#">Project Summary</a> (2 MB) <a href="#">Engagement Plan - Version 1.1</a> (215 KB) <a href="#">Spill Contingency Plan - Version 1.1</a> (237 KB) <a href="#">Waste Management Plan - Version 1.0</a> (351 KB) <a href="#">Certificate - Reinstatement</a> (122 KB) <a href="#">GIS Shape files</a> (23 KB) <a href="#">GIS Metadata</a> (49 KB) <a href="#">DRAFT Land Use Permit</a> (215 KB)
<b>Item For Review Distributed On:</b>	Aug 25 at 13:56 <a href="#">Distribution List</a>
<b>Reviewer Comments Due By:</b>	Sep 15, 2015
<b>Proponent Responses Due By:</b>	Sep 22, 2015
<b>Item Description:</b>	Platinum Group Metals Ltd. (PTM) has submitted a Type A Land Use Permit application to the Wek'èezhìi Land and Water Board (WLWB) on August 17, 2015. The purpose of this Land Use application is to continue mineral exploration around Lake Providence and to continue use of the existing camp and fuel cache at Credit Lake.

<b>Contact Information:</b>	<p>Together with this application, PTM has also submitted it's:</p> <ul style="list-style-type: none"> <li>• Engagement Plan - Version 1.1;</li> <li>• Spill Contingency Plan - Version 1.1; and,</li> <li>• Waste Management Plan - Version 1.0.</li> </ul> <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 development must not have been modified and 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 are the same as those screened on <a href="#">October 3, 2008</a>.</p> <p>The WLWB encourages reviewers to ask questions and provide comments and recommendations on the content of this Land Use Permit application and the draft Land Use Permit conditions.</p>
	<p>Elissa Berrill 867-765-4581  Roberta Judas 867-713-2500</p>

## Comment Summary

Environment Canada: Melissa Pinto				
ID	Topic	Reviewer Comment/Recommendation	Proponent Response	Board Staff Response
15	General File	<b>Comment</b> <a href="#">(doc)</a> EC Cover Letter <b>Recommendation</b>		

16	General File	<p><b>Comment</b> (<a href="#">doc</a>) Table 1. Species at Risk That May Be Encountered in the Project Area</p> <p><b>Recommendation</b></p>		
1	Requirements of the Fisheries Act	<p><b>Comment</b> 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><b>Recommendation</b> Compliance with the Fisheries Act is required. No deleterious substances from the Providence Lake Project (the Project) can enter fish bearing waters.</p>	<p><b>Sep 16:</b> The Fisheries Act will be available and reviewed in the camp for all employees and contractors that carry out activities to ensure compliance. To date the pre-existing camp and exploration activities have been in compliance with the Fisheries Act with no deleterious substances entering fish bearing waters. The Proponent is committed to continued compliance with the Fisheries act.</p>	
2	Spill Contingency Plan - Secondary Containment	<p><b>Comment</b> Environment Canada (EC) notes that secondary containment was not mentioned in the Spill Contingency Plan.</p> <p><b>Recommendation</b> 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</p>	<p><b>Sep 16:</b> Fuel cache and use is currently consists of temporary 200L drums. Inspections of fuel storage by Government inspectors under the previous Land Use Permit show no issues and indicate compliance with regulations. However, if further containment measures are recommended these will be implimented upon commencement of exploration activities. Spill kits and clean up materials are kept within 25m of the drum cache area and are marked with yellow sinage for recognition.</p>	

		<p>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 devices, etc.) must be on hand during any transfer of fuel or hazardous substances and at vehicle-maintenance areas.</p>		
3	Spill Contingency Plan - Location of Spill Kits	<p><b>Comment</b> EC notes that the Spill Contingency Plan does not indicate that spill kits and a copy of the Spill Contingency Plan are kept on-site where fuel and/or hazardous material are stored.</p> <p><b>Recommendation</b> EC recommends that the Proponent keep spill kits and copies of the Spill Contingency Plan on site where fuel and/or hazardous material are stored.</p>	<p><b>Sep 16:</b> There are spill kits located at the fuel cache in camp, the drilling sites when drilling and near the transfer sites when filling equipment or camp heating tanks.</p>	
4	Waste Management Plan - Incineration	<p><b>Comment</b> The Waste Management Plan indicates that combustible wastes are burned in an on-site incinerator.</p> <p><b>Recommendation</b> Should the Proponent choose to continue burning solid waste, EC recommends the use of an approved incinerator for the disposal of combustible wastes. EC has developed a technical document for batch waste incineration, and is available at the following web link: <a href="http://www.ec.gc.ca/gdd-mw/default.asp?lang=En&amp;n=F53EDE13-1">www.ec.gc.ca/gdd-mw/default.asp?lang=En&amp;n=F53EDE13-1</a>. The technical document provides information on appropriate</p>	<p><b>Sep 16:</b> The Proponent will review the EC technical document given with the link and assess whether the current incinerator at camp is an approved unit. If the current incinerator is deemed insufficient it will be replaced or solid waste will be removed from site under the solid waste management plan. The solid waste management plan will be revised and posted prior to the commencement of activities.</p>	

		incineration technologies, best management and operational practices, monitoring and reporting.		
5	Spill Contingency Plan - Contaminated materials	<p><b>Comment</b> The Spill Contingency Plan indicates that in the event of a spill, contaminated soils and contaminated soaked moss will be burned in the incinerator.</p> <p><b>Recommendation</b> EC recommends that the Proponent ensure all hazardous wastes, including contaminated soils and contaminated absorbents, are disposed of at an approved facility.</p>	<p><b>Sep 16:</b> The Spill Contingence Plan will be revised to remove the procedure of burning contaminated soils or soaked moss. These materials will be removed from site and disposed of at an approved facility in Yellowknife. Facilities locations are in the current waste disposal plan and will also be added to the revised Spill Contingency Plan.</p>	
6	Migratory Birds and Species at Risk	<p><b>Comment</b> 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 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.</p> <p><b>Recommendation</b> If active nests are encountered during the project activities, the nesting area should be avoided</p>	<p><b>Sep 16:</b> The Proponent will consult the Ec's web page for guidance in avoiding detrimental effects to migratory birds. The current policy of the company is to brief employees and contractors prior to work to report wildlife sightings and avoid contact and interference with migratory birds. Posters in camp indicate the proper action if encountering wildlife.</p>	

		<p>until nesting is complete (i.e., the young have naturally left the vicinity of the nest). For further information on how to protect migratory birds and their nests and eggs when planning or carrying out project activities, consult EC's web page at: <a href="http://www.ec.gc.ca/paom-itmb/">www.ec.gc.ca/paom-itmb/</a> for general guidance on avoidance of incidental take of migratory birds and the linked fact sheet "Planning Ahead to Reduce the Risk of Detimental Effects to Migratory Birds, and their Nests and Eggs".</p>		
7	Migratory Birds and Species at Risk	<p><b>Comment</b> EC notes that there will be a camp as part of the project activities.</p> <p><b>Recommendation</b> 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 also eat eggs and young birds in the area. These predators can have significant negative effects on the local bird populations.</p>	<p><b>Sep 16:</b> As part of the solid waste management plan solid waste that is approved for incineration is burned daily to avoid attractants. Other attractants are stored in containers within the kitchen building annex to avoid attracting wild life. These wastes are flown out.</p>	
8	Migratory Birds and Species at Risk	<p><b>Comment</b> Section 5.1 of the Migratory Birds Convention Act prohibits persons from depositing substances harmful to migratory birds in waters or areas frequented by migratory birds or in a place from which the substance may enter such waters or such an area.</p> <p><b>Recommendation</b> EC recommends that the Proponent ensure that substances harmful to migratory birds are not deposited in areas or waters (such as sumps) frequented by migratory birds or in a place from which these substances may enter such waters or such an area.</p>	<p><b>Sep 16:</b> The policy of the company is that no material what so ever is deposited in areas of water. Materials harmful to migratory birds are kept in containers and disposed of appropriately so that there is no chance of these materials entering water or land. This is strictly enforced.</p>	

9	Migratory Birds and Species at Risk	<p><b>Comment</b> EC notes that project activities will occur from spring to fall and may require use of aircraft.</p> <p><b>Recommendation</b> In order to reduce aircraft disturbance to migratory birds, EC recommends the following, subject to pilot discretion regarding safety: - Fly at times when few birds are present (e.g., early spring, late fall, winter) and minimize flights during particularly sensitive periods (i.e. during migration, nesting, and moulting). - If flights cannot be scheduled when few birds are present, plan flight paths that minimize flights over habitat known or likely to have birds and maintain a minimum flight altitude of 650 metres (2,100 feet). - Avoid known concentrations of birds (e.g., bird colonies, moulting areas) by a lateral distance of at least 1.5 kilometres. If avoidance is not possible, maintain a minimum flight altitude of 1,100 metres (3,500 feet) over these areas. - Avoid excessive hovering or circling over areas known or likely to have birds. - Inform pilots of these recommendations and of areas known to have birds.</p>	<p><b>Sep 16:</b> Pilots flying into the area will be informed of any bird activity in the area prior to leaving Yellowknife in order to avoid encounters. I times when sufficient ice is present and there are any birds in the area the pilots will be directed to land in an alternative area. Helicopter activity will be scheduled or modified to avoid areas that are likely to contain birds.</p>	
10	Migratory Birds and Species at Risk	<p><b>Comment</b> 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</p>		

found. Subsection 79(2) of SARA, states that during an assessment of a project, the 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 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.

**Recommendation** – 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. – 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

		<p>the Species at Risk registry at <a href="http://www.sararegistry.gc.ca">www.sararegistry.gc.ca</a> for information on specific species as well as the booklet "Species at Risk in the Northwest Territories" (2014 Edition) available at <a href="http://www.nwtspeciesatrisk.ca/sites/default/files/pdf/SpeciesatRiskintheNWT_English.pdf">http://www.nwtspeciesatrisk.ca/sites/default/files/pdf/SpeciesatRiskintheNWT_English.pdf</a>. As new species may have been assessed by COSEWIC or added to Schedule 1 of SARA since the booklet was last published, proponents should always check the Species at Risk registry to obtain the most current information. 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>		
11	Migratory Birds and Species at Risk	<p><b>Comment</b> Eskimo Curlew is designated as Endangered and listed on Schedule 1 of the Species at Risk Act. The project falls within the historical range of Eskimo Curlew, however,</p>	<p><b>Sep 16:</b> There will be an image of the Eskimo Curlew in camp and employees and contractors</p>	

		<p>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.</p> <p><b>Recommendation</b> 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 is found in this area.</p>	<p>will be asked to keep an eye out for any sightings and to report these to EC.</p>	
12	Migratory Birds and Species at Risk	<p><b>Comment</b> All mitigation measures identified by the Proponent, and the additional measures suggested herein, should be strictly adhered to in conducting project activities. This will require awareness on the part of the Proponent's representatives (including contractors) conducting operations in the field.</p> <p><b>Recommendation</b> EC recommends that all field operations staff be made aware of the Proponent's commitments to these mitigation measures and provided with appropriate advice / training on how to implement these measures.</p>	<p><b>Sep 16:</b> The Camp Manager will be responsible for making all employees and contractors on site aware of the mitigation measures for wildlife disturbance and ensure that the measures are adhered to. An</p>	
13	Migratory Birds and Species at Risk	<p><b>Comment</b> Implementation of the above-mentioned measures 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.</p> <p><b>Recommendation</b> EC recommends that the Proponent ensure they remain in compliance during all phases and in all undertakings related to the project.</p>	<p><b>Sep 16:</b> The Proponent will have these Acts and Regulations on site and the site manager will review and ensure compliance with the acts.</p>	

14	Migratory Birds and Species at Risk	<p><b>Comment</b> 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 (NWT) 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 &gt;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 NWT 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 NWT and Nunavut, especially in the eBird database, it would be invaluable for project location data to be included.</p> <p><b>Recommendation</b> EC recommends that the Proponent submit the data to eBird. If you have any questions about the program or uploading your data to eBird, contact the NWT/Nunavut Bird Checklist program at <a href="mailto:NWTchecklist@ec.gc.ca">NWTchecklist@ec.gc.ca</a></p>	<p><b>Sep 16:</b> Currently in camp there is a wildlife sightings list that is filled in by employees and contractors. Bird identification sheets should be added to allow for the specific reporting of different species to the eBird data site. The link is noted and will be added to teh sighting sheet for convienience of reporting.</p>	
GNWT - Environment and Natural Resources: Central Email GNWT				
ID	Topic	Reviewer Comment/Recommendation	Proponent Response	Board Staff Response

13	General File	<b>Comment</b> ( <a href="#">doc</a> ) ENR Letter with Comments and Recommendations <b>Recommendation</b>		
1	Topic 1: Storage, Handling and Disposal of Solid and Liquid Wastes	<b>Comment</b> A Waste Management Plan 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. Platinum Group Ltd. has submitted a Waste Management Plan for review and North Slave Region (NSR) has the following recommendations and suggestions to 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. <b>Recommendation</b> Condition #35 1) ENR recommends that the proponent submits an Incineration Management Plan providing more detailed plans for incineration management prior to the commencement of operations. I.e. Incinerator type, staff training, contingencies, etc.	<b>Sep 16:</b> The current Waste Management Plan will be revised and posted prior to field activity within the next year to include more detailed procedures for the segregation, storage, treatment, transfer and disposal of wastes, amount of waste generated, contingencies measures and staff training. The Incineration Section will include details such as incinerator type, daily incineration schedule, training for incineration is a prerequisite for incinerator operation to ensure total burn, as well as a contingency plan in the case of incinerator failure to avoid any accumulation of wildlife attractants. This may include more frequent flights to remove waste to teh approved facility in Yellowknife.	
2	None	<b>Comment</b> None <b>Recommendation</b> 2) That all secure containers are cleaned once emptied.	<b>Sep 16:</b> The cleaning of both pre-incineration storage containers as well as ash/non-combustible materials storage containers will be added to the revised Waste Management Plan and posted prior to commencement of field activities in the next year.	
3	None	<b>Comment</b> None <b>Recommendation</b> 3) The Requirement for removal of scrap metal, discarded machinery parts, tires, and drums to an	<b>Sep 16:</b> The revised Waste Management Plan will be more specific in listing non-combustible materials to be removed and disposed of at a approved facility. The List will include scrap	

		approved waste disposal facility should also be included in the Waste Management Plan.	metal, tires, discarded machinery parts, worn drill rods and drums.	
4	Topic 2: Caribou Water Crossings	<p><b>Comment</b> Water crossings are limited on the landscape and as such are very important in facilitating movements of wildlife across the land. Any diversion from a crossing could result in substantial increases in energy expenditures as caribou backtrack to find another appropriate route on their migratory path.</p> <p><b>Recommendation</b> Recommendation(s): 1) The proponent shall ensure that no operating activities will occur between May 15th to June 15th and October 15th to November 30th, within 10 km of known caribou water crossing.</p>	<p><b>Sep 16:</b> The Proponent will adhere to the regulations and ensure that no operation activities will occur between May 15th to June 15th and October 15th to November 30th, within 10km of known water crossings. Known watercrossings will be posted on a map of the property so the helicopter pilot also avoids the areas during these time of year.</p>	
5	Topic 3: Page 2, Item 3(d)	<p><b>Comment</b> ENR does not allow this method of soil remediation and is an air quality issue.</p> <p><b>Recommendation</b> 1) That proponent contacts Aileen Stevens, Air Quality Programs Coordinator, Environment Division, ENR for further advice prior to the start of project activities for further information as this is an air quality issue.</p>	<p><b>Sep 16:</b> The Proponet will contact Aileen Stevens for further guidance when revising the Spill Contingency Plan. The Spill Contingence Plan will be revised to remove the procedure of burning contaminated soils or soaked moss. These materials will be removed from site and disposed of at an approved facility in Yellowknife. Facilities locations are in the current was</p>	
6	Topic 4: Facility Map	<p><b>Comment</b> None</p> <p><b>Recommendation</b> 1) The map should be to scale and be large enough to include the location of your facility, nearby buildings or facilities, roads, culverts, catch basins, drainage patterns and any nearby bodies of water which could be impacted by a spill or topographic features which would affect access and response.</p>	<p><b>Sep 16:</b> The Proponent will survey the camp and draft a map the at the commencement of field activities within the next year. Currently there is a photo in the Land Use Permit Application taken from the air of the camp which consists of two insulated plywood buildings, 6 tents on wood platforms, outhouse pit toilet, firts aid shack, generator shack, Pacto toilet shack and water line. The picture shows drummed fuel cache in camp. The topography is such that teh drainage</p>	

			<p>from the entire camp area is to the south, &gt;100m from the lake for the drums. There are natural rock outcrop ridges that form elongate troughs parallel the lake shore further increasing the flow distance to water. There are no flowing water systems, creeks. The camp is situated on esker material and there is minimal ground and fauna disturbance of mosses due to this. No roads or culverts exist. The topography is such that there is no affect to access and response.</p>	
7	Topic 5: Spill Reponses Plan Activation Process	<p><b>Comment</b> None  <b>Recommendation</b> 1) This section should outline internal company procedures to activate appropriate response equipment and personnel.</p>	<p><b>Sep 16:</b> The procedures are posted with the emergency spill kits in camp and mobile to drilling. These procedures will be included in the revised Spill Contingency Plan to be completed prior to field activities and posted. The small scale of the camp makes it quick to respond to any spill. The trigger is any spill is to be dealt with immediately. All work must stop until spill has been cleaned up. Non-compliance will result in removal from the project.</p>	
8	Topic 6: Spill Reponses Plan Activation Process	<p><b>Comment</b> None  <b>Recommendation</b> 1) This section should outline internal company procedures to activate appropriate response equipment and personnel.</p>	<p><b>Sep 16:</b> The procedures are posted with the emergency spill kits in camp and mobile to drilling. These procedures will be included in the revised Spill Contingency Plan to be completed prior to field activities and posted. The small scale of the camp makes it quick to respond to any spill. The trigger is any spill is to be dealt with immediately. All work must stop until spill has been cleaned up. Non-compliance will result in removal from the project.</p>	

9	Topic 7: Training for Spill Response	<p><b>Comment</b> None</p> <p><b>Recommendation</b> 1) A sound training program is necessary when dealing with an emergency situation. The description can include a syllabus or brief outline of any training, whether it is on-the-job or formal courses. Fundamentals should include knowledge and use of any response equipment that may be used as well as knowledge of the hazards from the products that may be encountered. The training should provide for rapid and competent response consistent with company policies and procedures.</p>	<p><b>Sep 16:</b> The Camp Manager will be responsible for training and implimenting in regards to the Spill Contingency Plan. All Employees and contractors will be made aware of the location of the well marked spill kits and made aware of the proper technique and reporting of any spills Imediate response is key to mitigating the Spill from any of the 200L drums or smaller containers.</p>	
10	Topic 8: Spill Response Personnel	<p><b>Comment</b> None</p> <p><b>Recommendation</b> 1) A list of local contractors or clean-up specialists who may be called upon to assist in responding to spills should be provided.</p>	<p><b>Sep 16:</b> Due to the remote nature of the camp the Field response in critical to mitigatring Spill Effects. If further clean up is needed approved speciallist contractors will be flown in to assist. The contact information is with the camp manager but will be added to the revised Spill Contingency Plan to be completed at the commencement of field activities within teh next year</p>	
11	Topic 9: Material Safety Data Sheets for Hazardous Substances	<p><b>Comment</b> None</p> <p><b>Recommendation</b> 1)Ã,Ã Ã,Ã Ã,Ã Material Safety Data Sheets (MSDS) for each product or contaminant stored or used in the project should be provided in the application.</p>	<p><b>Sep 16:</b> MSDS sheets will be provided prior to any feild activities once the nature of contaminants is known. Currently only diesel fuel and Jet B are on site. Further contaminants stored on site will be supplied by the drill contractor and added to the revised Spill Contingency Plan once known and prior to the commencement of feild activities. All sheets are kept on site as well within the first aid room.</p>	

12	Topic 10: Spill Report Form Update	<p><b>Comment</b> None</p> <p><b>Recommendation</b> 1) The Spill Report Form provided is antiquated; the form should be updated to the current standard.</p>	<p><b>Sep 16:</b> The Spill Report Form will be updated to the current standard and added to the revised Spill Contingency Plan prior to the commencement of field activities within the next year.</p>	
<b>GNWT - Lands: Erin Anderson</b>				
<b>ID</b>	<b>Topic</b>	<b>Reviewer Comment/Recommendation</b>	<b>Proponent Response</b>	<b>Board Staff Response</b>
1	Draft LUP Application	<p><b>Comment</b> <a href="#">(doc)</a> The Department of Lands, North Slave Regional Office and Lands Administration, as well as the Mining Recorder's Office, have reviewed the application and are now submitting our comments.</p> <p><b>Recommendation</b> See attached letter for official recommendation.</p>	<p><b>Sep 16:</b> <a href="#">(doc)</a> Proponent has read the recommendation that the permit be granted.</p>	
<b>GNWT - Lands: Joseph Heron</b>				
<b>ID</b>	<b>Topic</b>	<b>Reviewer Comment/Recommendation</b>	<b>Proponent Response</b>	<b>Board Staff Response</b>
1	Inspectors Comments - DRAFT Land Use Permit	<p><b>Comment</b> <a href="#">(doc)</a> Please find attached the .pdf document concerning the Inspectors Comments on the DRAFT Land Use Permit.</p> <p><b>Recommendation</b> Inspectors recommend changes to the DRAFT Land Use Permit as attached.</p>	<p><b>Sep 16:</b> <a href="#">(doc)</a> Proponent has reviewed the comments made by the inspectors on the DRAFT Land Use Permit and is in agreement. No further comments added.</p>	
2	Inspectors Comments - Spill Contingency Plan	<p><b>Comment</b> <a href="#">(doc)</a> Please find attached a .pdf of Immediately Reportable Spill Quantities Table that is currently omitted from the applicants Spill Contingency Plan.</p> <p><b>Recommendation</b> Inspectors recommend the Immediately Reportable Spill Quantities Table be included in the applicants Spill Contingency Plan.</p>	<p><b>Sep 16:</b> <a href="#">(doc)</a> The attached Reportable Spill Quantities Table has been added to the revised Spill Contingency Plan that will be submitted prior to field activities within the next year.</p>	

**GNWT - Prince of Wales Northern Heritage Centre: Glen Mackay**

ID	Topic	Reviewer Comment/Recommendation	Proponent Response	Board Staff Response
1	Archaeological Site Avoidance	<p><b>Comment</b> There are several recorded archaeological sites in the proponent's exploration area. These sites must be avoided by exploration activities.</p> <p><b>Recommendation</b> We recommend that the proponent obtain the locations of the recorded archaeological sites in their exploration area via licence agreement with the PWNHC. The required forms are available here: <a href="http://www.pwnhc.ca/cultural-places/archaeology-program/#tab-id-2">http://www.pwnhc.ca/cultural-places/archaeology-program/#tab-id-2</a></p>	<p><b>Sep 16:</b> The Proponent is aware of a number of these sites which are located away from any work activity. Employees and contractors are made aware to not disturb any additional sites found during work and report them to the Camp Manager who will report them to GNWT, Glen Mackay.</p>	

**WLWB: Elissa Berrill**

ID	Topic	Reviewer Comment/Recommendation	Proponent Response	Board Staff Response
1	Engagement Plan - Conflict Resolution Process	<p><b>Comment</b> 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><b>Recommendation</b> Provide details on the dispute resolution process which would be followed in the event that an issue or conflict arises.</p>	<p><b>Sep 16:</b> If an issue or dispute arises conflict resolution will be held by the CEO and directors of the company. Platinum Group Metals has a strong commitment to working with all stakeholders as exemplified on the South African Development and Mine Projects. Issues are dealt with immediately in a fair and non-intimidating manner. Open communication is the key to successful engagement and the developing engagement plan reflects that. The Engagement Plan will be reviewed and updated within the next year or if exploration activity commences.</p>	

2	Engagement Plan-Triggers to Engagement	<p><b>Comment</b> Section 3.4 of the Board's Engagement Guidelines identifies the must-haves of an engagement plan; many of these requirements can be clearly identified through development of a "triggers table." Appendix F includes a template which assists with identification of when, why, who with, and how engagement will take place. Platinum Group Metals Ltd. has not outlined these details in its Engagement Plan.</p> <p><b>Recommendation</b> Develop a triggers table which addresses the must have's outlined in section 3.4 and explains how engagement will be conducted, with whom, and what activities would trigger a need to engage with affected parties.</p>	<p><b>Sep 16:</b> The triggers for engagement include informing of the planned program giving scope, nature of work and drill locations prior to commencement, any employment needs for field work, any changes in scope as soon as they are available, discovery of any new archeology sites, any environmental concerns and mitigation measures and finally if any effected party requests information or engagement. If it is a program longer than 1 month give update throughout, completion of any programs. Engagement will increase as if the scope increases. The engagement will be with all effected parties when general updates and notifications occur. These contacts are listed in the Engagement log. Currently the project is small scale exploration in nature but if it moves to the next level the Engagement Plan will be revised and improved in consultation with the affected parties. The Proponent has read section 3.4 Engagement Planning, noted Appendix F and will adhere to the form in the revised Engagement Plan to be completed prior to field work within teh next year. Engagement is initiated through written and e-mailed notification and proceeds to face to face meetings as the scope changes from early stage program. Engagement is started early in teh life of teh program to establish a good foundation.</p>	
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3	Camp - Maximum occupancy	<p><b>Comment</b> Platinum Group Metals Ltd. has indicated in its application that it anticipates both winter and summer work for this project. In order to calculate security associated with the project, the number of people anticipated to be at the camp during each season must be specified.</p> <p><b>Recommendation</b> Indicate the maximum number of individuals who are anticipated to be at the exploration camp during the winter programs and summer geology work.</p>	<p><b>Sep 16:</b> The maximum number of expected in camp during the winter program is 20. The maximum number of people during the summer geology work is 20. These numbers will generally be less.</p>	
4	Waste Management Plan - Total Waste Produced	<p><b>Comment</b> Section 2.2 of The Board's Waste Management Guidelines require the proponent to outline logistical considerations related to the waste produced by the project including characteristics of waste, an estimate the total volume of waste anticipated to be produced (annually or in total) by the project, and site considerations.</p> <p><b>Recommendation</b> Provide an estimate of the total volume of waste anticipated to be produced by the Project, to complement the characterization of wastes and site description included in the Waste Management Plan.</p>	<p><b>Sep 16:</b> During exploration activities there are scheduled flights no more that a week apart. The maximum build up of non combustible domestic waste to be flown out during a week is approximately 7 green garbage bags full. Empty 200L drums and 20L pails used for grease and drill additives are back hauled with the waste and during a drill program most of the 100 drums are flown out to Yellowknife on backhauls. The remaining drums are picked up when new fuel is brought in for the following program.</p>	
5	Waste Management Plan - Sumps and Incinerators - required details	<p><b>Comment</b> Section 3.4 outlines general information that is required for all infrastructure present at the site, such as sumps and incinerators. Sections 3.4.3 and 3.4.7 indicate specific details that must be included in the Waste Management Plan for the chosen sumps and combustion equipment used at the site.</p> <p><b>Recommendation</b> Please provide additional details regarding the type of sump and incinerator being used at the site in accordance with the Board's Waste Management</p>	<p><b>Sep 16:</b> The sump is located within 10m of the kitchen and dry building. It is dug into esker material approximately 2m deep, 1.3m wide and 2m long. It is covered with plywood weighed down with rocks. Perforated plywood sides within th sump prevent slumping but allow filtering. It also prevents wildlife from digging around the edges. Heated drain lines into the sump prevent freezing. It has been in use for</p>	

		<p>Guidelines in consideration of the scale, scope, nature, and duration of the Project.</p>	<p>several winter and summer programs previously and has proven to be of sufficient capacity to allow for proper filtration. The water intake for drinking is located in the lake down hill approximately 75m. This water was tested for camp consumption and shows no contamination. The sump has been cleaned of grease periodically which is shipped out for disposal at the appropriate facilities in Yellowknife. The incinerator is of unknown make, made of 1/4 thick steel with a fuel feed and electric blower attachment. It produces pure ash or full incineration. It is run daily to remove all combustible animal attractant waste. Ash and scrap metal is removed into a steel drum and shipped to Yellowknife to the approved disposal facility.</p>	
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Environment  
Canada

Environnement  
Canada

Environmental Protection Operations Directorate (EPOD)  
Prairie & Northern Region (PNR)  
5019 52<sup>nd</sup> Street, 4<sup>th</sup> Floor  
P.O. Box 2310  
Yellowknife, NT X1A 2P7

September 15, 2015

EC File: 5100 000 069/001  
WLWB File: W2015C0008

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

Via online submission

**RE: W2015C0008 – Platinum Group Metals Limited – Providence Lake Project –  
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 land use permit application 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](mailto:Melissa.Pinto@ec.gc.ca).

Sincerely,

Melissa Pinto  
Environmental Assessment Coordinator

Attachment(s): EC comments Excel Sheet  
Table 1

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

**Table 1.** Species at Risk That May Be Encountered in the Project Area

<b>Terrestrial Species at Risk potentially within project area<sup>1</sup></b>	<b>COSEWIC Designation</b>	<b>SARA Status</b>	<b>Government Organization with Primary Management Responsibility<sup>2</sup></b>	<b>Recovery Strategy, Action Plan or Management Plan posted on the Species at Risk Public Registry</b>
Eskimo Curlew	Endangered	Schedule 1, Endangered	EC	Recovery Strategy - Final
Peregrine Falcon ( <i>anatum-tundrius</i> complex)	Special Concern	Schedule 1, Special Concern	GNWT	Management Plan – Proposed
Rusty Blackbird	Special Concern	Schedule 1, Special Concern	GNWT	Management Plan - Proposed
Short-eared Owl	Special Concern	Schedule 1, Special Concern	GNWT	
Red-necked Phalarope	Special Concern	No Status	EC	
Grizzly Bear (Western population)	Special Concern	No Status	GNWT	
Wolverine	Special Concern	No Status	GNWT	

Notes:

*1 Fisheries and Oceans Canada has responsibility for aquatic species.*

*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 Migratory Birds Convention Act (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.*

September 16, 2015

Violet Camsell Blondin  
Chair  
Wekeezhii Land and Water Board  
#1-4905 48<sup>th</sup> Street  
Yellowknife, NT  
X1A 3S3

Dear Ms. Camsell Blondin,

Re: **Platinum Group Metals  
Land Use Permit Application – MV2015C0008  
Camp and Fuel Storage for Mineral Exploration  
Request for Comment**

The Department of Environment and Natural Resources (ENR) has reviewed the application at reference based on its mandated responsibilities under the *Environmental Protection Act*, the *Forest Management Act*, the *Forest Protection Act*, *Waters 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 Solid and Liquid Wastes**

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

A Waste Management Plan 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.

Platinum Group Ltd. has submitted a Waste Management Plan for review and North Slave Region (NSR) has the following recommendations and suggestions to 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):**

Condition #35

- 1) ENR recommends that the proponent submits an Incineration Management Plan providing more detailed plans for incineration management prior to the commencement of operations. *I.e. Incinerator type, staff training, contingencies, etc.*
- 2) That all secure containers are cleaned once emptied.
- 3) The Requirement for removal of scrap metal, discarded machinery parts, tires, and drums to an approved waste disposal facility should also be included in the Waste Management Plan.

**Topic 2: Caribou Water Crossings****Comment:**

Water crossings are limited on the landscape and as such are very important in facilitating movements of wildlife across the land. Any diversion from a crossing could result in substantial increases in energy expenditures as caribou backtrack to find another appropriate route on their migratory path.

**Recommendation(s):**

- 1) The proponent shall ensure that no operating activities will occur between May 15<sup>th</sup> to June 15<sup>th</sup> and October 15<sup>th</sup> to November 30<sup>th</sup>, within 10 km of known caribou water crossing.

**Topic 3: Page 2, Item 3(d)****Comment(s):**

ENR does not allow this method of soil remediation and is an air quality issue.

**Recommendation(s):**

- 1) That proponent contacts Aileen Stevens, Air Quality Programs Coordinator, Environment Division, ENR for further advice prior to the start of project activities for further information as this is an air quality issue.

**Topic 4: Facility Map****Comment(s):**

A map is intended to illustrate the facilities relationship to other areas that may be affected by a spill.

**Recommendation(s):**

- 1) The map should be to scale and be large enough to include the location of your facility, nearby buildings or facilities, roads, culverts, catch basins, drainage patterns and any nearby bodies of water which could be impacted by a spill or topographic features which would affect access and response.

**Topic 5: Spill Reponses Plan Activation Process**

**Recommendation(s):**

- 1) This section should outline internal company procedures to activate appropriate response equipment and personnel.

**Topic 6: Spill Reponses Plan Activation Process**

**Recommendation(s):**

- 1) This section should outline internal company procedures to activate appropriate response equipment and personnel.

**Topic 7: Training for Spill Response**

**Recommendation(s):**

- 1) A sound training program is necessary when dealing with an emergency situation. The description can include a syllabus or brief outline of any training, whether it is on-the-job or formal courses. Fundamentals should include knowledge and use of any response equipment that may be used as well as knowledge of the hazards from the products that may be encountered. The training should provide for rapid and competent response consistent with company policies and procedures.

**Topic 8: Spill Response Personnel**

**Recommendation(s):**

- 1) A list of local contractors or clean-up specialists who may be called upon to assist in responding to spills should be provided.

**Topic 9: Material Safety Data Sheets for Hazardous Substances**

**Recommendation(s):**

- 1) Material Safety Data Sheets (MSDS) for each product or contaminant stored or used in the project should be provided in the application.

## Topic 10: Spill Report Form Update

### Recommendation(s):

- 1) The Spill Report Form provided is antiquated; the form should be updated to the current standard.

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

Should you have any questions or concerns please do not hesitate to contact Patrick Clancy, Environmental Regulatory Analyst, at (867) 920-6118.

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



September 14, 2015

Roberta Judas  
Wek'èezhìi Land and Water Board (WLWB)  
PO Box 32  
WEKWEÈTI NT X0E 1W0

Dear Ms. Judas:

**Land Use Permit Application: W2015C0008 – Platinum Group Metals Ltd.**  
**Type of Operation: Mineral Exploration**  
**Location: Lake Providence Area**

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The Government of the Northwest Territories (GNWT) reviewed Land Use Permit Application W2015C0008 and recommends that the permit be granted.

On September 11, 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 Inspectors, Clint Ambrose at (867) 765-6648 or Joe Heron at (867) 765-6684.

Sincerely,

Marty Sanderson  
A/Regional Superintendent  
North Slave Region

c. North Slave Region - Yellowknife

SS/eka

\*All **Green highlights** – Standard Conditions that have been added to this Permit.

\*All **Yellow highlights** – areas where Board staff request input from the Inspector.

\*Conditions without highlights – conditions that were in the previous LUP (have been updated to match the language of the MVLWB’s List of Standard Conditions, as applicable).



**Conditions Annexed to and Forming Part  
of Land Use Permit # W2015C0008**

**Part A: Scope of Permit**

1. This Permit entitles Platinum Group Metals Ltd. to conduct the following land-use operation: 
  - a) use of a campsite, and
  - b) establishment of petroleum fuel storage facilities.
2. This Permit is issued subject to the conditions contained herein with respect to the use of land for the activities and area identified in Part A, item 1 of this Permit.
3. Compliance with the terms and conditions of this Permit does not excuse the Permittee from its obligation to comply with the requirements of any applicable Federal, Territorial, Tłı̨chǫ, or Municipal laws.

**Part B: Definitions** (defined terms are capitalized throughout the Permit)

**Act** - the *Mackenzie Valley Resource Management Act*.

**Archaeological Overview** - as defined by the Prince of Wales Northern Heritage Centre – Guidelines for Developers.

**Archaeological Impact Assessment** - as defined by the Prince of Wales Northern Heritage Centre – Guidelines for Developers.

**Board** - the Wek'èezhìi Land and Water Board established in subsection 57.1(1) of the *Mackenzie Valley Resource Management Act*.

**Borehole** - a hole that is made in the surface of the ground by drilling or boring.

**Drilling Fluids** - any liquid mixture of water, sediment, drilling muds, chemical additives or other wastes that are pumped down hole while drilling and are specifically related to drilling activity.

**Drilling Waste** - all materials or chemicals, solid or liquid, associated with drilling, including drill cuttings and Drilling Fluids.

**Fuel Storage Container** - a container for the storage of petroleum or allied petroleum products with a capacity of less than 230 litres.

**Fuel Storage Tank** - a closed container for the storage of petroleum or allied petroleum products with a capacity of more than 230 litres.

**Greywater** - all liquid wastes from showers, baths, sinks, kitchens, and domestic washing facilities but not including toilet wastes.

**Habitat** - the area or type of site where a species or an individual of a species of wildlife naturally occurs or on which it depends, directly or indirectly, to carry out its life processes.

**Inspector** - an Inspector designated by the Minister under the *Mackenzie Valley Resource Management Act*.

**Minister** - the Minister of Indian Affairs and Northern Development. 

**Ordinary High Water Mark** - the usual or average level to which a body of water rises at its highest point and remains for sufficient time so as to change the characteristics of the land. In flowing waters (rivers, streams) this refers to the “active channel/bank-full level” which is often the 1:2 year flood flow return level. In inland lakes, wetlands, or marine environments, it refers to those parts of the Watercourse bed and banks that are frequently flooded by water so as to leave a mark on the land and where the natural vegetation changes from predominately aquatic vegetation to terrestrial vegetation (excepting water tolerant species). For reservoirs, this refers to normal high operating levels (full supply level).

**Secondary Containment** - containment that prevents liquids that leak from Fuel Storage Tanks or containers from reaching outside the containment area and includes double-walled Tanks, piping, liners, and impermeable barriers.

**Sewage** - all toilet wastes and Greywater.

**Sewage Disposal Facilities** - Sump(s) and/or Sewage collection tank(s) and/or storage containers designed to hold Sewage.

**Spill Contingency Plan** - a document, developed in accordance with Indian and Northern Affairs Canada’s *Guidelines for Spill Contingency Planning* (April 2007), that describes the set of procedures to be implemented to minimize the effects of a spill.

**Sump** - a man-made pit or natural depression in the earth's surface used for the purpose of depositing waste that does not contain Toxic Material, such as non-toxic Drilling Waste or Sewage, therein.

**Toxic Material**- any substance that enters or may enter the environment in a quantity or concentration or under conditions such that it:

- a) Has or may have an immediate or long-term harmful effect on the environment or its biological diversity;
- b) Constitutes or may constitute a danger to the environment on which life depends; or
- c) Constitutes or may constitute a danger in Canada to human life or health.

**Waste** – any garbage, debris, chemical, or Toxic Material to be used, stored, disposed of, or handled on land, and also as defined in section 51 of the Act.

**Waste Management Plan (WMP)** - a document, developed in accordance with the Board's *Guidelines for Developing a Waste Management Plan*, that describes the methods of waste management from waste generation to final disposal.

**Watercourse** - a natural body of flowing or standing water or an area occupied by water during part of the year, and includes streams, springs, swamps and gulches but does not include groundwater.

**Part C: Conditions Applying to All Activities** (headings correspond to subsection 26(1) of the Mackenzie Valley Land Use Regulations)

**26(1)(a) Location and Area**

- |    |  |   |
|----|--|---|
| 1. | The Permittee shall use an existing campsite, as described in the complete application.  | <b>Existing Camp</b>  |
| 2. | Prior to the commencement of drilling, the Permittee shall submit the drill target locations on a 1:50,000-scale map with coordinates and map datum to an Inspector and the Board. | <b>Drill Locations</b>  |
| 3. | The Permittee shall not conduct this land-use operation on any lands not designated in the complete application.   | <b>Location of Activities</b>   |
| 4. | <del>Prior to the commencement of the land-use operation, the Permittee shall accompany an Inspector during an inspection of the proposed land-use area.</del>                     | <b>Inspect Locations</b><br> |

**26(1)(b) Time**

- |    |  |                               |
|----|--|-------------------------------|
| 5. | At least 48 hours prior to the commencement of this land-use operation, the Permittee's Field Supervisor shall contact an Inspector at (867) 765-6648.   | <b>Contact Inspector</b>      |
| 6. | At least 48 hours prior to commencement of this land-use operation, the Permittee shall provide the following information, in writing, to the Board <u>and</u> an Inspector:<br>(a) the name(s) of the person(s) in charge of the field operation; (b) alternates; and (c) all methods for contacting the above person(s). | <b>Identify Agent</b>         |
| 7. | At least ten days prior to the completion of the land-use operation, the Permittee shall advise an Inspector of: (a) the plan for removal or storage of equipment and materials; and (b) when final cleanup and reclamation of the land used will be completed.  | <b>Reports Before Removal</b> |

**26(1)(c) Type and Size of Equipment**

- |    |  |                                |
|----|--|--------------------------------|
| 8. | The Permittee shall not use any equipment except of a similar type, size, and number to that listed in the complete application. | <b>Only Approved Equipment</b> |
|----|--|--------------------------------|

**26(1)(d) Methods and Techniques**

- |     |  |  |
|-----|--|--|
| 9.  | Immediately upon completion of operations at each Borehole, the Permittee shall remove or cut off and seal each drill casing at ground level.                                  | <b>Mineral Exploration Drill Casings</b> |
| 10. | The Permittee shall construct and maintain the overland portion of winter roads with a minimum of 10 cm of packed snow and/or ice at all times during this land-use operation. | <b>Winter Roads</b>                      |
| 11. | The Permittee shall not erect camps or store material, other than that required for immediate use, on the ice surface of a Watercourse.  | <b>Storage on Ice</b>                    |

**26(1)(e) Type, Location, Capacity, and Operation of All Facilities**

- 12. The Permittee shall ensure that the land use area is kept clean at all times. **Clean Work Area**
- 13. The Permittee shall not locate any Sump within 100 metres of the Ordinary High Water Mark of any Watercourse, unless otherwise authorized in writing by an Inspector. **Sumps From Water**

**26(1)(f) Control or Prevention of Ponding of Water, Flooding, Erosion, Slides, and Subsidence of Land**

- 14. ~~The Permittee shall insulate the ground surface beneath all structures associated with this land use operation to prevent: (a) any vegetation present from being removed; (b) the melting of Permafrost; and (c) the ground settling and/or eroding.~~ **Permafrost Protection** 
- 15. The land-use operation shall not cause obstruction to any natural drainage. **Natural Drainage**
- 16. ~~The Permittee shall minimize erosion by installing erosion control structures as the land use operation progresses.~~ **Progressive Erosion Control** 
- 17. The Permittee shall, where flowing water from a Borehole is encountered: (a) plug the Borehole in such a manner as to permanently prevent any further outflow of water; and (b) immediately report the occurrence to the Board and an Inspector. **Flowing Artesian Well**
- 18. The Permittee shall not conduct off-road vehicle travel in areas without snow-covered surfaces. **Off-road Vehicle Travel**
- 19. The Permittee shall prepare the site in such a manner as to prevent rutting of the ground surface. **Prevention of Rutting**
- 20. The Permittee shall suspend overland travel of equipment or vehicles at the first sign of rutting. **Suspend Overland Travel**
- 21. The Permittee shall not move any equipment or vehicles unless the ground surface is in a state capable of fully supporting the equipment or vehicles without rutting or gouging. **Vehicle Movement Freeze-up**
- 22. ~~The Permittee shall not ford wet streams.~~ **No Fording of Streams** 
- 23. ~~The Permittee shall not remove vegetation or operate heavy equipment within 100 metres of the Ordinary High Water Mark of any Watercourse.~~ **Watercourse Buffer** 

**26(1)(g) Use, Storage, Handling, and Ultimate Disposal of Any Chemical or Toxic Material**

- 24. ~~The Permittee shall not use any Drilling Fluids, muds, or additives that were not identified in the complete application, unless the MSDSs are provided to the Board and Inspector and usage of the chemical(s) is authorized in writing by the Board.~~ **Drilling Chemicals** 

<p>25. At least seven days prior to the use of any chemicals that were not identified in the complete application, the MSDS sheets must be provided to an Inspector and the Board.</p>	<p><b>Chemicals</b> </p>
<p>26. When drilling within 100 metres of the Ordinary High Water Mark of any Watercourse, and when drilling on ice, the Permittee shall contain all drill water and waste in a closed circuit system for reuse, off-site disposal, or deposit into a land-based Sump or natural depression.</p>	<p><b>Drilling Near Water or On Ice</b></p>
<p>27. The Permittee may deposit Drilling Waste that does not contain Toxic Material in a Sump or natural depression. Any Sumps or natural depressions used to deposit Drilling Waste must be located at least 100 metres from the Ordinary High Water Mark of any Watercourse, unless otherwise authorized in writing by an Inspector.</p>	<p><b>Drilling Waste</b></p>
<p>28. The Permittee shall remove all Drilling Waste containing Toxic Material to an approved disposal facility.</p>	<p><b>Drilling Waste Disposal</b></p>
<p>29. The Permittee shall not allow any Drilling Waste to spread to the surrounding lands or Watercourses.</p>	<p><b>Drilling Waste Containment</b></p>
<p>30. Prior to the expiry date of this Permit or the end of operations, whichever comes first, the Permittee shall backfill and restore all Sumps, unless otherwise authorized in writing by an Inspector.</p>	<p><b>Backfill Sumps</b></p>
<p>31. The Permittee shall maintain a record of all spills. For all reportable spills, in accordance with the GNWT <i>Spill Contingency Planning and Reporting Regulations</i>, the Permittee shall: (a) immediately report each spill to the 24-hour Spill Report Line (867) 920-8130; (b) report each spill to an Inspector within 24 hours (867) 765-6648; and (c) submit, to the Board and an Inspector, a detailed report on each spill within 30 days.</p>	<p><b>Report Spills</b></p>
<p>32. The Permittee shall dispose of all Toxic Material as described in the approved Waste Management Plan.</p>	<p><b>Waste Chemical Disposal</b> </p>
<p>33. The Permittee shall dispose of all combustible waste petroleum products by removal to an approved disposal facility.</p>	<p><b>Waste Petroleum Disposal</b></p>
<p><b>26(1)(h) Wildlife and Fish Habitat</b></p>	
<p>34. The Permittee shall take all reasonable measures to prevent damage to wildlife and fish Habitat during this land-use operation.</p>	<p><b>Habitat Damage</b></p>
<p><b>26(1)(i) Storage, Handling, and Disposal of Refuse or Sewage</b></p>	
<p>35. 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.</p>	<p><b>Waste Management</b></p>

36. The Permittee shall keep all garbage and debris in a secure container until disposal.	<b>Garbage Container</b>
37. The Permittee shall dispose of all garbage, waste, and debris as described in the approved Waste Management Plan, unless otherwise authorized in writing by an Inspector.	<b>Remove Garbage</b>
38. The Permittee shall dispose of all Sewage and Greywater as described in the approved Waste Management Plan.	<b>Sewage Disposal</b>
<b>26(1)(j) Protection of Historical, Archaeological, and Burial Sites</b>	
39. The Permittee shall not operate any vehicle or equipment within 150 metres of a known or suspected historical or archaeological site or burial ground.	<b>Archaeological Buffer</b>
40. The Permittee shall not knowingly remove, disturb, or displace any archaeological specimen or site.	<b>Site Disturbance</b>
41. The Permittee shall, where a suspected archaeological or historical site, or burial ground is discovered: (a) immediately suspend operations on the site; and (b) notify the Board at (867) 765-4592 or an Inspector at (867) 765-6648, and the Prince of Wales Northern Heritage Centre at (867) 920-6182 or 873-7688.	<b>Site Discovery and Notification</b>
42. At least _____ days prior to any new land disturbance, including new drill sites, the Permittee shall conduct an Archaeological Overview to identify areas of high and low potential for archaeological and burial sites and shall submit a summary report to the Board and the Prince of Wales Northern Heritage Centre.	<b>Archaeological Overview</b>
43. Prior to disturbance in areas of high potential for archaeological or burial sites identified in the Archaeological Overview, the Permittee shall conduct an Archaeological Impact Assessment of the sites where disturbance is planned and shall submit a summary report to the Board and the Prince of Wales Northern Heritage Centre.	<b>AIA – High Potential</b>
<b>26(1)(k) Objects and Places of Recreational, Scenic, and Ecological Value</b>	
<b>26(1)(l) Security Deposit</b>	
44. Prior to the commencement of the land-use operation, the Permittee shall deposit with the Minister a security deposit in the amount of \$_____.	<b>Security Deposit</b>
45. All costs to remediate the area under this Permit are the responsibility of the Permittee.	<b>Responsibility for Remediation Costs</b>
<b>26(1)(m) Fuel Storage</b>	
46. The Permittee shall not place any Fuel Storage Containers or Tanks within 100 metres of the Ordinary High Water Mark of any Watercourse, unless otherwise authorized in writing by an Inspector.	<b>Fuel Near Water</b>

47.	The Permittee shall ensure that all fuel caches have adequate Secondary Containment.	<b>Fuel Cache Secondary Containment</b>
48.	The Permittee shall set up all refueling points with Secondary Containment.	<b>Secondary Containment - Refueling Fuel Containment</b>
49.	The Permittee shall not allow petroleum products to spread to surrounding lands or Watercourses.	
50.	The Permittee shall mark all Fuel Storage Containers and Tanks with the Permittee's name.	<b>Mark Containers</b>
51.	Within ten days of the establishment of any fuel cache, the Permittee shall report the location and quantity of the cache in writing to an Inspector and the Board.	<b>Report Fuel Location</b>
52.	The Permittee shall seal all outlets of Fuel Storage Containers and store the containers on their sides with the outlets located at 3 and 9 o'clock, except for containers currently in use.	<b>Seal Outlet</b>
53.	The Permittee shall adhere to the Spill Contingency 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.	<b>Spill Contingency Plan</b>
54.	Prior to commencement of operations, the Permittee shall ensure that spill-response equipment is in place to respond to any potential spills.	<b>Spill Response</b>
55.	All equipment that may be parked for two hours or more, shall have a haz-mat/drip tray under it or be sufficiently diapered. Leaky equipment shall be repaired immediately.	<b>Drip Trays</b>
56.	The Permittee shall clean up all leaks, spills, and contaminated material.	<b>Clean Up Spills</b>
	<b>26(1)(n) Methods and Techniques for Debris and Brush Disposal</b>	
	<b>26(1)(o) Restoration of the Lands</b>	
57.	Prior to the expiry date of this Permit, the Permittee shall complete all cleanup and restoration of the lands used.	<b>Final Cleanup and Restoration</b>
58.	The Permittee shall carry out progressive reclamation of disturbed areas as soon as it is practical to do so.	<b>Progressive Reclamation</b>
	<b>26(1)(p) Display of Permits and Permit Numbers</b>	
59.	The Permittee shall display a copy of this Permit in each campsite established to carry out this land-use operation.	<b>Display Permit</b>
	<b>26(1)(q) Biological and Physical Protection of the Land</b>	

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| 60. | If any plan is not approved by the Board, the Permittee shall revise the plan according to the Board's direction and re-submit it to the Board for approval.  | Resubmit Plan      |
| 61. | The Permittee shall adhere to the Engagement Plan, once approved, and shall annually review the plan and make any necessary revisions to reflect changes in operations or as directed by the Board. Revisions to the plan shall be submitted to the Board for approval. | Engagement Plan    |
| 62. | All revised plans submitted to the Board shall include a brief summary of the changes made to the plan.   | Summary of Changes |

### Appendix 3: Immediately Reportable Spill Quantities

<b>TDG Class</b>	<b>Substance</b>	<b>Immediately Reportable Quantities for NWT 24 Hour Spill Line</b>
1 2.3 2.4 6.2 7 None	Explosives Compressed gas (toxic) Compressed gas (corrosive) Infectious substances Radioactive Unknown substance	Any amount
2.1 2.2	Compressed gas (flammable) Compressed gas (non-corrosive, non flammable)	Any amount of gas from containers with a capacity greater than 100 L
3.1 3.2 3.3	Flammable liquids	≥ 100 L
4.1 4.2 4.3	Flammable solids Spontaneously combustible solids Water reactant	≥ 25 kg
5.1 9.1	Oxidizing substances Miscellaneous products or substances excluding PCB mixtures	≥ 50 L or 50 kg
5.2 9.2	Organic Peroxides Environmentally hazardous	≥ 1 L or 1 kg
6.1 8 9.3	Poisonous substances Corrosive substances Dangerous wastes	≥ 5 L or 5 kg
9.1	PCB mixtures of 5 or more ppm	≥ 0.5 L or 0.5 kg
None	Other contaminants (e.g. crude oil, drilling fluid, produced water, waste or spent chemicals, used or waste oil, vehicle fluids, waste water, etc.)	≥ 100 L or 100 kg
None	Sour natural gas (i.e. contains H <sub>2</sub> S) Sweet natural gas	Uncontrolled release or sustained flow of 10 minutes or more

In addition, all releases of harmful substances, regardless of quantity, are to be reported to the NWT spill line if the release is near or into a water body, is near or into a designated sensitive environment or sensitive wildlife habitat, poses imminent threat to human health or safety, poses imminent threat to a listed species at risk or its critical habitat, or is uncontrollable.