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September 11, 2020

File: W2020L8-0003

Joel Gowman
Crown-Indigenous Relations and
Northern Affairs Canada –
Contaminants and Remediation Division
P.O. Box 1500
Yellowknife, NT X1A 2R3

Sent by e-mail

Dear Joel Gowman,

Re: CIRNAC-CARD – Water Licence Application Incomplete – Rayrock Remediation Project – former Rayrock Mine, NT

On September 1, 2020, Wek'èezhii Land and Water Board (Board) staff received the Application for Water Licence (Licence) W2020L8-0003¹ for the Rayrock Remediation Project (Project) from Crown-Indigenous Relations and Northern Affairs Canada – Contaminants and Remediation Division (CIRNAC-CARD).

The Application has been reviewed and found to be lacking information required under section 6 of the Mackenzie Valley Federal Areas Waters Regulations. For the Application to be considered complete, refer to the MVLWB *Guide To Completing Water Licence Applications to the Mackenzie Valley Land and Water Board*² (Guide) and submit the following information to the Board's office:

1. **Closure and Reclamation Plan:** Describe the Closure and Reclamation Plan, including any temporary closure(s) and seasonal shutdowns, in the Application Package. As per the Boards' Standard Water Licence Conditions and Schedules,³ a CRP is required for remediation projects. While CIRNAC-CARD submitted a Remediation Action Plan (RAP), as explained in the Boards' public review responses regarding the Standard Water Licence Conditions, a RAP is not a Board requirement.⁴ A CRP was not submitted as part of the Application Package, nor did the Application Package clearly identify how the *Guidelines for the Closure and Reclamation of Advanced Mineral and Exploration and Mine Sites in the Northwest Territories* (the Closure Guidelines)⁵ will be addressed. The updated Application Package must include a CRP or an explanation of how the CRP requirements have been addressed. It is noted that the CRP is to include Closure and Reclamation for any processes, structures, facilities, and/or Wastes that are introduced by a remediation project.

¹ See WLWB Online Registry (www.wlwb.ca) for [W2020L8-0003](#).

² MVLWB [Guide To Completing Water Licence Applications to the Mackenzie Valley Land and Water Board](#).

³ See WLWB 'Policies and Guidelines' webpage for [MVLWB Standard Water Licence Conditions and Schedules – Basic \(2020\)](#)

⁴ See WLWB 'Latest News' webpage for [LWBs Draft Standard Water Licence Conditions Responses to Review Comments and Recommendations \(April 2020\)](#)

⁵ See WLWB 'Policies and Guidelines' webpage for [MVLWB Guidelines for the Closure and Reclamation of Advanced Mineral Exploration and Mine Sites in the Northwest Territories \(2013\)](#)

In addition to the information required above, we recommend that CIRNAC-CARD confirm the following:

In the Remedial Action Plan submitted with the Applications, CIRNAC-CARD indicates that it has developed a Rayrock Remediation Project Aquatic Effects Monitoring Program (AEMP Design Plan) and that it would be submitted in support of the Type A Water Licence application. This Plan was not included in the documents submitted in support of the Application. CIRNAC-CARD should confirm if it intends to include an AEMP Design Plan to support the Application.

When submitting its updated Application Package, CIRNAC-CARD is reminded to submit documents according to the *Document Submission Standards*⁶ with respect to submission of large electronic document (i.e., over 20 MB).

It is noted that the Application was submitted using an older version of the Application form. An up-to-date Application form can be found [here](#).

Upon receipt of this information, the Application will be reviewed as per the Mackenzie Valley Federal Areas Waters Regulations. If this information is not provided within 90 days of the date of this letter, staff will return the Application.

Please contact Anneli Jokela at (867) 765-4588 with any questions or concerns regarding this letter.

Yours sincerely,



Rhiana Bams
Regulatory Specialist

Copied to: Andrew Richardson - Project Officer, CIRNAC-CARD
Ron Breadmore - Project Manager, CIRNAC-CARD
Tim Morton – Inspector, CIRNAC
Mike Roesch, CIRNAC

⁶ See WLWB Online 'Policies and Guidelines' webpage for [MVLWB Document Submission Standards \(2019\)](#)