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December 15, 2020

File: MV2019L2-0006

David Harpley  
VP, Environment and Permitting Affairs  
Canadian Zinc Corporation  
SUITE 1710-650 West Georgia Street  
Vancouver BC V6B 4N9

Sent by e-mail

Dear David Harpley:

**RE: Closure and Reclamation Plan  
Prairie Creek Mine – Mineral Exploration**

On September 9, 2019, the Mackenzie Valley Land and Water Board (MVLWB or the Board) issued Water Licence (Licence) MV2019L2-0006<sup>1</sup> to Canadian Zinc Corporation (CZN). As per Part G, Condition 1 of Licence MV2019L2-0006, CZN was required to submit a Closure and Reclamation Plan one year following the effective date of the Licence, for approval.

Board staff note that CZN submitted a Closure and Reclamation Plan on October 2, 2020.<sup>2</sup> The Closure and Reclamation Plan was not in conformity with the requirements of Part G, Condition 1 and Schedule D, Condition 1 of Licence MV2019L2-0006. Board staff sent CZN comments outlining the details of non-conformity on October 5, 2020 (see Appendix A, Table 1). Board staff note that it has been over one year and three months since Licence MV2019L2-0006 was issued, therefore, the submission deadline for the Closure and Reclamation Plan has passed. Board staff remind CZN that if a compliance date cannot be met, CZN must submit an extension request with rationale for the Board's consideration.

Please resubmit a revised Closure and Reclamation Plan as soon as possible that addresses the non-conformity comments sent on October 5, 2020. Board staff will distribute the revised Closure and Reclamation Plan once it is complete. CZN's full cooperation is anticipated and appreciated. If you have any questions or concerns, please contact [Kim Murray](#) at (867) 766-7458 or [Jacqueline Ho](#) at (867) 766-7455.

<sup>1</sup> See MVLWB Public Registry ([www.mvlwb.com](http://www.mvlwb.com)). MV2019L2-0006 – CZN – Mineral Exploration – Issuance Type B Water Licence ([hyperlink](#)), dated September 9, 2019.

<sup>2</sup> See MVLWB Public Registry ([www.mvlwb.com](http://www.mvlwb.com)). Closure and Reclamation Plan ([hyperlink](#)), dated October 2, 2020.

Sincerely,



Kim Murray  
Regulatory Specialist

Copied to: CZN Distribution List  
Kyle Christiansen, Inspector, GNWT-ENR  
Danielle Rogers, Inspector, GNWT-Lands

Attached: Appendix A:  
Table 1: Board Staff Conformity Comments on CZN's Mineral Exploration  
Closure and Reclamation Plan (Licence Requirements)

**Table 1: Board Staff Conformity Comments on CZN’s Mineral Exploration Closure and Reclamation Plan (Licence Requirements)<sup>3</sup>**

#	Licence MV2019L2-0006 Part B, Condition 6 Requirement	Section in Plan	Conformity Comment
1	Conformity table	n/a	Not included, update with conformity table
2	Licence MV2019L2-0006 Schedule D, Condition 1 Requirements	Section in Plan	Conformity Comment
3	A plain language summary of the Plan;	Summary	Present
4	A description of the overall goals for Closure and Reclamation of the Project, including expected future land use;	2.2 Reclamation Goals	Present
5	A description of the Closure and Reclamation planning team;	3.0 Planning Team	Present
6	A description of engagement related to Closure and Reclamation planning, including a summary of completed and planned engagement, and links to the Engagement Plan referred to in Part B of this Licence for the Project;	4.0 Engagement	Present
7	A list of any other regulatory instruments required for Closure and Reclamation of the Project;	5.0 Regulatory Instruments	Present
8	A description of the pre-existing and current Project environment, including, but not limited to:	6.0 Project Environment	
9	climatic conditions;	6.1 Climatic Conditions	Present
10	physical conditions;	6.2 Physical Conditions	Present
11	chemical conditions;	6.3 Chemical Conditions	Present
12	biological conditions;	6.4 Biological Conditions	Present

<sup>3</sup> See MVLWB Public Registry ([www.mvlwb.com](http://www.mvlwb.com)). MV2019L2-0006 – CZN – Mineral Exploration – Issuance Type B Water Licence ([hyperlink](#)), dated September 9, 2019.

13	any physical or chemical assessments of soil, Water, and Permafrost; and	unknown	If n/a, indicate in conformity table
14	traditional uses;	6.5 Traditional Uses	Present
15	A description of the Project, including, but not limited to:	7.0 Project Description	
16	site history;	7.1 Site History	Present
17	Project development;	7.0 Project Description	Present
18	current status of the Project;	7.2 Proposed Further Exploration	Present
19	maps delineating all disturbed areas, Borrow locations, site facilities, hydrological features, and elevation contours; and	unknown	Not included
20	photographs.	Photo 1 and 2 (mine water treatment images)	Present
21	A description of each Project component, including, but not limited to:	8.0 Closure and Reclamation Description	
22	the Water intake facilities;	8.2 Water Intake Facilities	Present
23	the Water treatment and Waste disposal sites and facilities;	8.3 Water Treatment and Waste Disposal Sites and Facilities	Present
24	the petroleum and chemical storage areas;	8.4 Petroleum and Chemical Storage Areas	Present
25	the natural Runoff Waters from the development site;	8.6 Natural Runoff	Present
26	the restoration of natural drainage and the restoration of stream banks at the operation site(s);	8.7 Restoration of Natural Drainage/Stream Banks	Present
27	the potential for Groundwater contamination;	8.8 Potential Groundwater Contamination	Present
28	any facilities or areas which may be affected by development such that potential pollution problems exist;	unknown	If n/a, indicate in conformity table
29	the Waste Rock storage areas;	8.5 Waste Rock	Present

30	areas affected by spills or Unauthorized Discharges; and	unknown	Not included
31	other areas affected by Project activities;	unknown	Not included
32	For each Project component identified in Condition (h) above, a description of Closure and Reclamation plans, including, but not limited to:	8.0 Closure and Reclamation Description	
33	Closure Objectives and Closure Criteria;		Not included. See below; for each reclamation method there should be closure objectives and criteria.
34	preferred Closure and Reclamation option and method;		There is an approach for Drill Pads and Access Roads (to scarify the surface where necessary to allow natural invasion). Indicating that facilities (e.g. Water Intake Facilities, Water Treatment and Waste Disposal Sites and Facilities, Petroleum and Chemical Storage Areas) will be maintained as part of the ongoing site care and maintenance in anticipation for future use during mine operations is not a Closure and Reclamation option and method; it is a description of care and maintenance. If CZN wants to continue to hold separate authorizations for exploration and mining and milling, then closure options and methods for all Project components currently authorized under MV2019L2-0006 and MV2020C0008 will have to be developed (i.e. if the site were abandoned before mining and milling started what closure methods would be applicable to all the Project components related to exploration).
35	design drawings, signed and stamped by a Professional Engineer, for any Engineered Structures;		Not included; can indicate that these will be developed later.
36	Water management and restoration of natural drainage;	8.7 Restoration of Natural Drainage/Stream Banks	Present
37	predicted environmental effects during and after Closure and Reclamation activities;		Not included as Closure and Reclamation activities are not presented for all Project components.
38	post-closure monitoring, maintenance, and reporting;		Not included
39	uncertainties and contingencies;		Not included

40	climate change considerations; and		Not included
41	Closure and Reclamation Research plans;		Not included
42	A description of any planned Progressive Reclamation;	9.0 Progressive Reclamation	Present
43	A plan for Temporary Closure, including, but not limited to the following information:	10.0 Temporary Closure Plan	
44	Temporary Closure goals and objectives;		Not included
45	a description of activities and methods;		Present
46	a description of monitoring, maintenance, and reporting;		Not included
47	contingencies; and		Not included
48	an implementation schedule;		Not included
49	An implementation schedule that includes Progressive Reclamation and final Closure and Reclamation activities; and		Present
50	A Closure Cost Estimate.		Suggest indicating that no update to closure costs are proposed at this time, given the recent decision on security re: MV2020C0008 and MV2019L2-0006.