



August 17, 2020

Mavis Cli-Michaud, Chair
Mackenzie Valley Land and Water Board
7th Floor - 4922 48th Street
PO Box 2130, Yellowknife NT X1A 2P6

Re: Intervention for NorZinc's Application for Renewal of MV2008L2-0002 and MV2008D0014

Dear Ms. Cli-Michaud,

The proposed Prairie Creek Mine and All Season Road fall within Łíídlíı Kúé First Nation's traditional territory. Our community has been engaged on this file for numerous years and is committed to advancing socially and environmentally responsible development projects that increase the prosperity of our Region.

NorZinc is requesting a renewal of water licence MV2008L2-0002 for a 3-year term and a replacement of land use permit MV2008D0014 for a 5-year term. We understand that NorZinc is making these requests to ensure their mining authorizations remain valid while they complete their plans for expanding the throughput of ore at the mine. Since NorZinc plans to make an amendment application in the next year to accommodate their expansion plans, they are not seeking any changes to either the licence or the permit at this time.

As part of our review of the application, we have identified the need for some updates to the current authorizations based on changes in policy (e.g., new AEMP guidelines, new CCME guideline for dissolved zinc) or studies done (e.g., baseline water quality in Prairie Creek, updated groundwater modelling) since the original licence/permit were granted in 2013. However, since additional amendments will be necessary to accommodate NorZinc's mine expansion proposal, we believe that it makes most sense to consider all the potential changes to the mining authorizations when the final details of the mine expansion are available. Since NorZinc is still gathering the information that will be needed to consider the mine expansion amendment, the current renewal process could only consider changes to the authorizations based on the original mine plan (i.e., as presented in 2014 water licensing process).



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Overall, while we acknowledge that updates to the authorizations will be needed prior to mine construction and operation, it seems like a waste of time and resources to consider changes based on an outdated mine plan this year only to have to repeat the entire process again in 2021/22 for a new mine plan. For these reasons:

- We support NorZinc's request for a 3-year term for its mining water licence and a 5-year term for its mining land use permit.
- We agree with NorZinc that this application should be exempted from preliminary screening.
- We have no recommendations for changes to the conditions of the current mining water licence and land use permit as part of the renewal process.

Based on our position, we do not believe a public hearing is needed prior to approving the current application. Furthermore, we believe that requiring a public hearing will cause our communities and other parties to waste limited resources that could be better used for meaningful participation in the future amendment process for the mine.

NDDDB and LKFN have regular meetings with NorZinc and so are aware of their future plans for the site. We plan to fully engage in the regulatory process for amendments to the current authorizations in support of NorZinc's expansion proposal in the coming months.

Mahsi,

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