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October 18, 2023

File: MV2023C0022

Dave R. Webb
Prestige Lithium Inc.
280-1090 West Georgia Street
Vancouver, BC V6E 3V7

Sent by e-mail

Dear Dave R. Webb,

Re: Prestige Lithium Project – Land Use Permit Application – Information Request – Scope of Authorization

On July 4, 2023, Mackenzie Valley Land and Water (Board) staff received the Application Package (Application) for a new Land Use Permit (Permit) MV2023C0022¹ for the Prestige Lithium Project (Project) from Prestige Lithium Inc. (Prestige). On July 7, 2023, the Application was deemed incomplete as Board staff identified missing information required for the Board to process the Application.² Additional information was received on August 3 and 14, 2023. Public review of the Application commenced on August 11, 2023, with comments and recommendations due September 22, 2023, and responses due September 29, 2023.

In accordance with subsection 124(1) of the *Mackenzie Valley Resource Management Act* (MVRMA), the Board is required to make a preliminary screening determination on any part of a proposed development that is not exempt from screening. During the review of the Application, comments and recommendations on the scope of the proposed Project activities were submitted.³

As described in section 3.2, item 17 of the Land and Water Board (LWB) *Guide to the Land Use Permitting Process* (Guide)⁴, unless the proposed project could be exempt from preliminary screening, all potential impacts and proposed mitigations for the proposed activities are to be identify and described. For the identified potential impacts, a description of the proposed mitigations, including the environmental management

¹ See the MVLWB Online Registry www.mvlwb.com for [MV2023C0022](#).

² See the MVLWB for Prestige Lithium - [Land Use Permit Application - Incomplete - July 7 23](#).

³ See MVLWB Online Registry for Prestige Lithium Project - New Land Use Permit - [Review Summary Table - Sept 22 23](#) GNWT ECC-comments 1, 4, 9, 12, 13, 14, and 15; and Board staff-comments 9 and 11.

⁴ See the MVLWB Policies and Guidelines webpage for the LWB [Guide to the Land Use Permitting Process](#).

systems, treatment systems, and monitoring programs, and explanation of how the potential effects of climate change were considered are to be provided.

On review of Prestige's responses to the comments and recommendations noted above, Board staff have determined that additional evidence is required, as the Application does not provide details on all of the potential impacts and proposed mitigations for the change in scope. In an effort to ensure the necessary evidence is on the record, Board staff are requesting additional information from Prestige at this time. The details of the requested information are described below.

Background

In response to the July 7, 2023, incomplete letter, Prestige submitted additional information, including an updated Application on August 14, 2023.

In the updated Permit Application form,⁵ Prestige stated that:

- No camp will be needed as operations will be based from Yellowknife using helicopter support; and no camp will be installed.
- Proposed equipment to be used consisted of 1 helicopter and 1 diamond drill.
- All the fuel types to be used consisted of 8 x 205L barrels of diesel and 1 x 100lb bottle of propane.

In the closure cost estimate worksheet submitted August 3, 2023,⁶ Prestidge noted:

- No camp, either temporary or fixed structures, or # of person days for solid waste.
- Included a total volume of gasoline and diesel of 1670 L.
- Accounted for 1 piece of heavy equipment and 2 small generators or pumps.

New Information Submitted During Review: Camp, Equipment, and Fuel

In response to review comments and recommendations, Prestige stated that:

- A single structure will be near the drill that would house a medica and provide emergency shelter and in the future, a 12 person campsite may be added, site to be determined, so is now included here.⁷
- An increase in the limits of fuel to be stored onsite to 8 drums of diesel, 4 drums of Jet B, and a 20 litre container of gasoline.⁸
- The equipment list updated to add two snowmachines and a boat.⁹

⁵ See the MVLWB for Prestige Lithium - [Land Use Permit Application - Updated - Aug 14 23](#).

⁶ See the MVLWB for Prestige Lithium - [Security Estimate - Aug 3 23](#).

⁷ See the MVLWB for Prestige Lithium Project - New Land Use Permit - [Review Summary Table - Sept 22 23](#) Response to GNWT ECC-comments 1, 4, and 12.

⁸ See MVLWB Online Registry for Prestige Lithium Project - New Land Use Permit - [Review Summary Table - Sept 22 23](#) GNWT ECC-comments 9, 14, and 15; and Board staff-comments 9 and 11.

⁹ See the MVLWB for Prestige Lithium Project - New Land Use Permit - [Review Summary Table - Sept 22 23](#) Responses to GNWT ECC-comments 13; and Board staff-comment 10.

Information Requests

At this time, Board staff have identified missing information required for the Board to process the Application. For the Application to continue in the regulatory process, refer to the Application Form¹⁰ and the LWB *Guide to the Land Use Permitting Process* (Guide)¹¹ and submit the following information to the Board's office:

1. Camp: As described in section 3.2, item 9 of the Guide, if the project includes a camp, a description is required. The submitted updated Application notes that no camp would be installed.

Further information is required on the now proposed camp size and layout, including the following information:

- a. camp layout, including the number, type, and dimension of structures;
- b. water sources and maximum quantity of water to be used (rate, volumes in m³/day) to support the camp;
- c. number of people to be stationed in the camp and the duration of their stay;
- d. number of person-days;

Explain, with rationale, any variations in this information throughout the duration of the proposed activities.

2. Equipment: As described in section 3.2, item 12 of the Guide, all equipment proposed to be used is to be included. The submitted updated Application identifies the types of equipment proposed as 1 helicopter and 1 diamond drill.

Further information is required on the number and types of equipment now proposed to be used.

3. Fuel: As described in section 3.2, item 13 of the Guide, all petroleum-based fuel types to be used are to be provided. The submitted updated Application identifies all the fuel types to be used as 8 x 205L barrels of diesel and 1 x 100lb bottle of propane.

Further information is required on the number and types of fuel now proposed to be used.

4. Proposed Waste Management Methods: As described in section 3.2, item 11 of the Guide, all applicants must submit detailed waste management information. The submitted Waste Management Plan, Version 1.1,¹² identifies that:

- a. Project staff will include up to six people and no camp is required as staff will be returning to Yellowknife each day.
- b. No greywater will be produced under this Permit as the Project will not have a camp.

Further information is required on the handling of waste generated at the now proposed camp.

¹⁰ See the MVLWB Apply for Permit/Licence webpage for the Land Use Permit [Application Form](#).

¹¹ See the MVLWB Policies and Guidelines webpage for the LWB [Guide to the Land Use Permitting Process](#).

¹² See the MVLWB for Prestige Lithium - [Waste Management Plan Version 1.1 - Aug 3 '23](#).

5. Spill Contingency Plan: As described in section 3.2, item 15 of the Guide, all applicants must describe spill contingency planning. The submitted Spill Contingency Plan, Version 1.1,¹³ identifies that:
- a. Project staff will include up to six people and no camp is required as staff will be returning to Yellowknife each day.
 - b. Estimated quantities of spillable fuels to be used includes 8 x 205L barrels of diesel and 1 x 100lb tank of propane.
 - c. Helicopters will be fueled in Yellowknife, not at the Project site.
 - d. The Safety Data Sheets for hazardous fuel materials were included as an appendix for diesel, propane, and gasoline.

Further information is required on the number and types of fuel now proposed to be used as well as clarification on the activities now being proposed.

6. Potential Environmental Impacts of The Project and Proposed Mitigations: As described in section 3.2, item 17 of the Guide, unless the proposed project could be exempt from preliminary screening, all potential impacts and proposed mitigations for the proposed activities are to be identify and described. The Impact-Mitigation Table in the submitted updated Application did not identify any potential impacts from the establishment of a camp.

The information provided about potential impacts and proposed mitigations will be used in the preliminary screening of the Project and/or to develop permit conditions. Further information on the potential impacts and proposed mitigations is required on the activities now being proposed, including but not limited to:

- a. Land
 - i. Soil compaction
 - ii. Destabilization/erosion
 - b. Permafrost
 - i. Loss or change in extent
 - c. Surface Water
 - i. Water flow or level changes (permanent, temporary, seasonal)
 - d. Terrestrial Wildlife Habitat
 - i. Direct injury or mortality
 - ii. Human-wildlife conflicts
7. Closure and Reclamation – Closure Cost Estimate: As described in section 3.2, item 18 of the Guide, the Board will set the amount of security based on the estimated costs of closing and reclaiming the Project site, and the applicant’s proposed closure plans for the Project. To inform the Board’s decision, the applicant must develop a closure cost estimate to include in the application package. The submitted closure cost estimate does not account for the activities now being proposed, as noted during the review period.

Based on the Information Requests 1-3, listed above, a revised closure cost estimate on the activities now being proposed is required.

¹³ See the MVLWB for Prestige Lithium - [Spill Contingency Plan Version 1.1 - Aug 3 '23](#).

8. Additional Supporting Information – Engagement: As described in section 3.2, item 19 of the Guide, prior to submitting an Application package, applicants must identify and contact any other parties potentially affected by the Project. Expectations regarding this engagement is set out in the MVLWB [Engagement Guidelines for Applicants and Holders of Water Licences and Land Use Permits](#). The Engagement Plan submitted with the Application included an Engagement Record that noted engagement commenced December 2022 and concluded July 2023.¹⁴ Detailed information on discussions were not provided.

Based on the Information Requests 1-3, listed above, Prestige to confirm the engagement conducted to date was inclusive of all proposed activities for the Project.

The submitted Engagement Plan, Version 1.1, identifies that:

- a. Project staff will include up to six people and no camp is required as staff will be returning to Yellowknife each night.

Additional clarification required on the activities now being proposed.

9. Additional Supporting Information: The Erosion Management Plan, Version 1.1,¹⁵ identifies that:

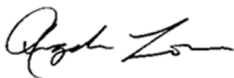
- a. Project staff will include up to six people and no camp is required as staff will be returning to Yellowknife each night.

Additional clarification required on the activities now being proposed.

These additional requirements are set out in the numbered Information Requests above and in accordance with the LWB [Rules of Procedure](#).¹⁶ Responses to these Information Requests should be submitted to Board staff by **5:00pm November 13, 2023**. The information will be distributed for a public review process that allows Prestige Lithium Inc. to provide responses.

Please contact Angela Love via [email](#) with any questions or concerns regarding this letter.

Yours sincerely,



Angela Love
Regulatory Specialist

BCC'd to: Akaitcho Distribution List

¹⁴ See the MVLWB for Prestige Lithium - [Engagement Plan V1.1 - Aug 3 23](#).

¹⁵ See the MVLWB for Prestige Lithium - [Erosion Management Plan Version 1.1 - Aug 3 23](#).

¹⁶ See the MVLWB Rules of Procedure page to access the LWB [Rules of Procedure](#). Rules 61 and 63.