



Sahtu Land and Water Board

Staff Report

Applicant: Integral Metals Corp.	
Location: Mackenzie Mountains, Ravens Throat River	File Numbers: S24C-004
Date Prepared: May 30, 2024	Date of Board Meeting: July 18, 2024
Subject/Project Name: The KAP Project (Type A Land Use Permit Application)	

1. Purpose/Report Summary

The purpose of this Report is to present to Sahtu Land and Water Board for decision and direction:

- a) Application for a Type A Land Use Permit (LUP or Permit) S24S-003
- b) Draft Preliminary Screening Determination
- c) Draft Reasons for Decision
- d) Draft Preliminary Screening Determination Letter to Mackenzie Valley Environmental Impact Review Board (MVEIRB)
- e) Draft Permit Conditions
- f) Security Estimate
- g) Sahtu Land Use Plan Conformity Check
- h) Wildlife and Archaeology Protection Plan
- i) Waste Management Plan
- j) Spill Contingency Plan
- k) Engagement Plan and Log
- l) Closure and Reclamation Plan

2. Background

Integral Metals Corp. (Integral) holds a 100% interest in the mining claims associated with the KAP Project and intends on conducting mineral exploration of previous exploration holes and new holes to find zinc, gallium, and germanium in sufficient quantities to justify subsequent further evaluation and potentially extraction. The KAP project is located in the Mackenzie Mountains 315km northwest of Fort Simpson near Camp Dal and the Raven's Throat River.

Integral Metals Corp's exploration activities will be following up on a review of historic work, which included geological mapping, geochemical sampling, trenching, and diamond drilling between 1976 and 1998. Diamond and reverse-circulation drilling are the methods of bedrock-testing that will be employed to determine the extent and grade of mineralization. An airborne magnetic geophysical survey is also proposed, to augment the previous gravity geophysical surveys in the area and a high-

resolution will be employed to help delineate the structures that host the mineralization and to fine-tune the drill targets.

Integral Metals Corp. intends on applying for a term length of five years with a possible extension to carry out the proposed activities. During the operation of the exploration program, progressive restoration of field samples and drill sites will occur on an on-going basis and may consist of up to 100 drill holes per year. Integral has tentative plans for the first year consisting of up to 20 drill holes to re-test the area drilled by Cominco and Fire Steel Resources using the technique mentioned above and small diameter reverse-circulation drilling.

2.1 Regulatory Process Timeline

- **April 30, 2024** – Submission Received
- **May 13, 2024** – Submission Complete/Conforms
- **May 27, 2024** – Review Comments Due
- **June 10, 2024** – Proponent Responses Due
- **July 18, 2024** – Board Meeting

3. Project Overview

3.1 Project Activities

Integral has applied for a Type A Land Use Permit (LUP) for the following activities:

- Mineral exploration, including diamond-drilling and reverse-circulation drilling;
- Use of equipment, vehicles and machines;
- Use and storage of fuel;
- Construction, operation and maintenance of a temporary camp and potential satellite camps; and;
- Establishment and maintenance of winter-access trails within the property.

3.2 Project Activities Schedule

Project Schedule outlined in the application form is between August 2024 – August 2029. The operation may occur throughout the year with pauses that may take place during spring break-up or fall freeze-up.

3.2 Authorization History

Integral Metals Corp. has no previous authorization history with the Sahtu Land and Water Board

3.3 Exemption from Preliminary Screening

The project has not gone through preliminary screening. A draft Preliminary Screening report is attached.

3.4 Sahtu Land Use Plan Conformity

The Board must confirm that the Application conforms with the SLUP.

Table 1: SLUP Conformity Requirements

Conformity Requirement	Application Section(s)	Supporting Evidence	Board Staff Review
General Conformity Requirement			
CR#1 – Land Use Zoning	Project Description	Maps and list of mineral tenure	Confirmed project is within Special Management Zone 38 Mackenzie Mountains
CR#2 – Community Engagement and Traditional Knowledge	Project Description; Engagement Plan; Wildlife and Archaeology Protection Plan	Engagement log and engagement records. Trip to the Sahtu region to meet with communities. TK study requested with potentially impacted communities, including the TRRC and NRRC.	Confirmed applicant has reached out to potentially impacted communities and emailed both RRCs to request a TK study
CR#3 – Community Benefits	Engagement Plan	Engagement log and engagement records trip to the Sahtu region to meet with communities. Tk study requested with potentially impacted parties.	Confirmed applicant has extensive record keeping of engagement activities including the engagement log, plan, and email correspondence with potentially impacted parties.
CR#4 – Archaeological Sites and Burial Sites	Project Description; Wild and Archaeology Protection Plan; Engagement Plan	Communication with PWNHC. Engagement log and engagement records. Professional archaeologist contracted to conduct a desktop Archaeological Overview Assessment (AOA) of archaeological and historical data. TK study requested with potentially impacted parties.	Confirmed. Conditions found in the draft land use permit and the recommendations received from PWNHC will help protect known and chance find archaeological sites. A desktop AOA will be conducted and submitted to PWNHC prior to any new land disturbance.
CR#5 – Watershed Management	Spill Contingency Plan; Waste Management Plan	Spill contingency and waste management planning, including water usage volume. Minimum setbacks from watercourses established.	Project is located near the Ravens Throat River. The applicant will be withdrawing less than 99m ³ per day from the Ravens Throat River, and from a second order stream.
CR#6 – Drinking Water	Spill Contingency Plan; Waste Management Plan	Spill contingency and waste management planning, including water usage volume. Minimum setbacks from watercourses established.	The conditions of the land use permit and the mitigation measures outlined in the spill contingency plan and waste management plan will help ensure that any down stream drinking water source isn't contaminated.
CR#7 – Fish and Wildlife	Wildlife and Archaeology	Communication with ENR, and RRC engagement. Spill contingency and	Board staff agree with the applicant's evidence. Board staff

	Protection Plan; Spill Contingency Plan; Waste Management Plan; Engagement Plan	waste management planning, including water usage volume, no in-water construction. Minimum setbacks from watercourses established. Vertical and horizontal separations from wildlife with helicopters and avoiding sensitive time periods such as calving and kidding. Critical wildlife polygons received from ENR. TK study requested with potentially impacted parties.	expect that the comments and recommendations from ECCC will be incorporated in the plan regarding Barn Swallows.
CR#8 – Species Introductions	Wildlife and Archaeology Protection Plan; Engagement Plan	Communication with ENR, and RRC engagement. Properly cleaned equipment. No non-native seed mixes used for reclamation activities. TK study requested with potentially impacted parties.	Agree
CR#9 – Sensitive Species and Features	Wildlife and Archaeology Protection Plan; Engagement Plan	Communication with ENR, and RRC engagement. Accessed current data sources from ENR. No activity within 1,000m of a known mineral lick; no activity within 500m of glacial refugia; and identification of any mineral licks and refugia.	ECCC provided mitigation measures and timing for Bank Swallow to the applicant. Engagement Plan is a living document will be updated accordingly.
CR#10 – Permafrost	Project Description	Permafrost mitigation strategy.	Impacts to permafrost should be low as camp set up will be on already disturbed land and no permanent structures will be set up.
CR#11 – Project-Specific Monitoring	Project Description; Wildlife and Archaeology Protection Plan; Spill Contingency Plan; Waste Management Plan	Monitoring plan and supporting documentation. Monitoring of camp activities, and regular inspections of drill sites for potential impacts to waters. Archaeological chance finds procedures.	Agree. LUP nonstandard condition requiring progress reports will be part of the LUP if approved.
CR#12 – Financial Security	Draft Security Estimate	Closure and reclamation plan; and waste management plan	Agree
CR#13 – Closure and Remediation	Closure and Reclamation Plan	Closure and reclamation plan; and waste management plan	Agree
CR#14 – Protection of Special Values	Project Description; Wildlife and Archaeology Protection Plan	In special management zone #38; not in conservation zone or proposed conservation initiative.	Agree

4. Program Components

4.1 Project Location

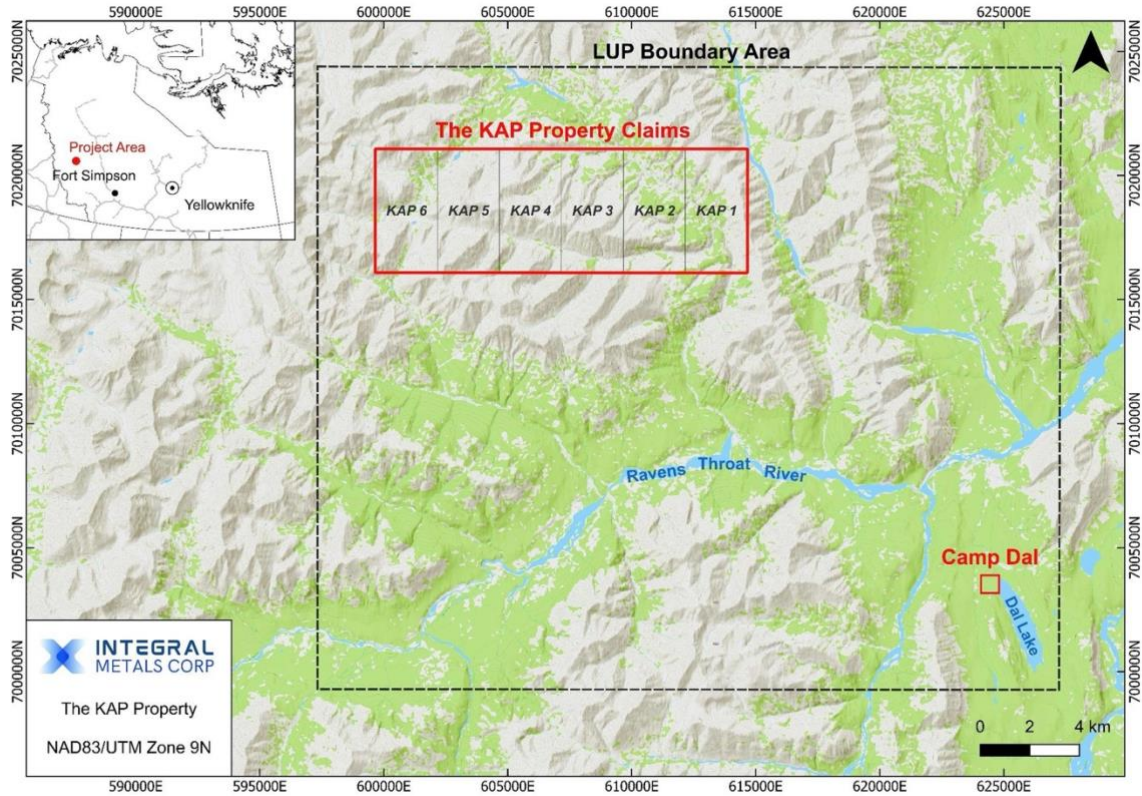


Figure 1 Location of the LUP Boundary Area, the KAP Property, and Camp Dal.

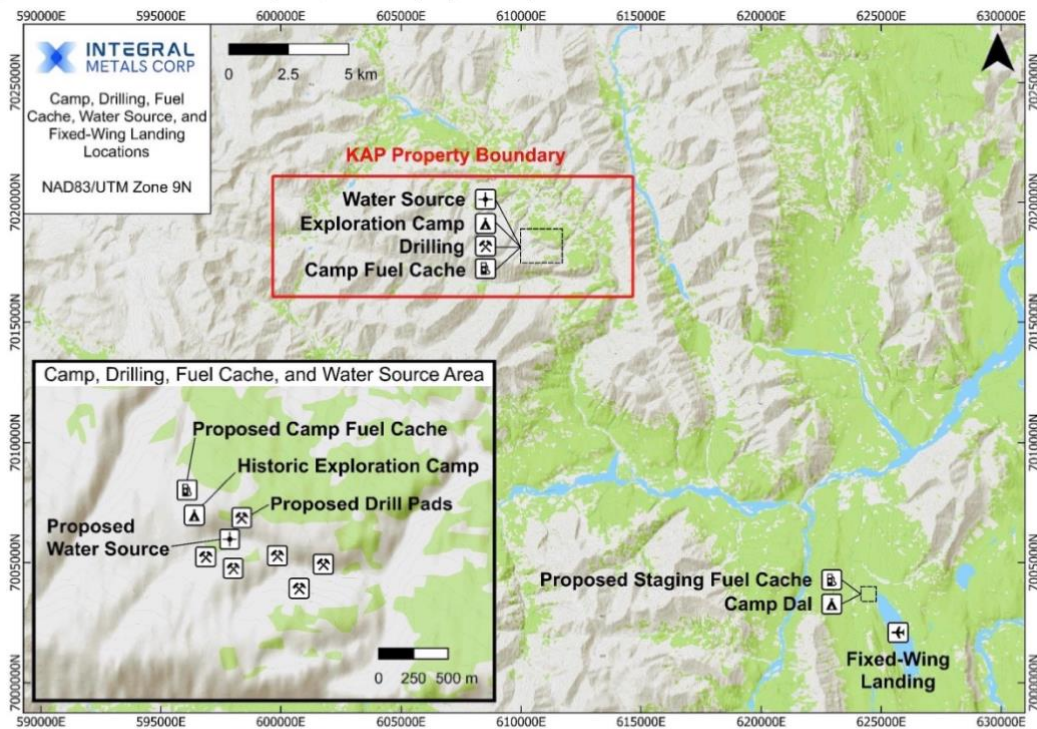


Figure 2 Potential camps, drill pads, fuel caches, water sources, and fixed-wing landing locations.

4.2 Equipment List

Common Name	Typical Use	Quantity	Unit Weight (kg)
Diamond Drill Boyles 25A/37 or similar ¹	Drill-testing potential carbonatite associated REE mineralization	2	8,600 (including rods and casings)
Bell 407 helicopter or similar	Equipment and crew movements	1	1,300
Reverse Circulation Drill RC Hornet or similar ¹	Drill testing mineralization to infill REE drilling	1 - 2	4,350 (all components)
Inciner8 dual-chamber incinerator or similar	Disposal of combustible waste	1	1,000
Snowmobiles ²	Camp and operations support	2	200
Boats ²	Staging area support	2	300
33 kw diesel generator ³	Electrical power supply	1	800
15 kw diesel generator ³	Electrical power supply	1	450
5 kw gas generators ³	Electrical power supply and backup	3	100
Water pumps ³	Camp and diamond drill water	4	25
Snow cat	Movement of equipment, materials and personnel around the property as well as construction of and maintenance of ice trails and airstrip	1	6,400
Kubota Tractor B26 or similar	Construction and maintenance of ice trails and airstrip, digging sumps	1	1,050

¹ Note that only two types of drill will be on-site at any given time (e.g., 2 DDH, or 2 RC, or 1 DDH and 1 RC).

² Note that only two light vehicles will be on-site at any given time (e.g., either 2 boats in summer, or 2 snowmobiles in winter).

³ Note that only up to six small generators and/or pumps will be on-site at any given time.

4.3 Fuel Requirements and Fuel Storage

Type of Fuel	Number of Containers	Capacity of Containers (e.g., litres, pounds)	Type of Container (e.g., barrel, tank, tidy tank)	Proposed storage or staging location(s)
Diesel	Up to 50	205 L	Drums, Tanks	To be determined
Gasoline	Up to 25	205 L	Drums, Tanks	
Aviation Fuel	Up to 75	205 L	Drums, Tanks	
Propane	Up to 30	45 kg	Tanks	
Other		2,000L Total	Varies	

4.4 Camp

Integral intends on setting up a temporary camp as their base of operations for the exploration activities, possibly positioned where the camp utilized by Fire Steel Resources was located between 1995 and 1998. Camp capacity will not exceed 30 people and will average around 15 occupants for most of the program. Permission has also been obtained from Raven's Throat Outfitters to utilize Camp Dal, located approximately 20 kilometers southeast of the project, as a secondary camp and fuel cache staging area to minimize the frequency of helicopter flights and reduce environmental impacts.

The camp will be constructed on level, dry, durable ground. Integral will seek out ground that is gravelly to allow proper drainage of surface water preventing erosion and destruction of any sensitive areas. All camp sumps and pits will be constructed in locations 100m from the high-water. The camp will consist of the following:

Item, Purpose	Quantity	Dimensions (m)	Area (m ²)
Tent, Sleeper	3	4.3 x 4.8	20.6
Tent, Kitchen	1	4.3 x 9.8	42.1
Tent, Dry	1	4.3 x 12.2	52.5
Tent, Office	1	4.3 x 4.8	20.6
Tent, Core Logging	1	4.3 x 4.8	20.6
Tent, Washroom	1	4.3 x 4.8	20.6
Shack, Generators	1	2.4 x 2.4	5.8

4.5 Water Use Requirements and Water Sources

The cumulative proposed water withdrawal is less than 100m³/day equivalent to an “instantaneous” value of 0.0006m³/s. The diamond drilling is expected to use up to 49 m³/day, while the reverse circulation drilling will use virtually no water but is accounted for by applying 0.5m³ to each drill hole. Once the camp is established, the anticipated water usage will be 0.2m³/day to 0.5m³/day per person.

5. Regulatory Requirements

5.1 Eligibility

The Applicant is eligible under Mackenzie Valley Land Use Regulations (MVLUR) section:

18(a)(i) *A person is eligible for a permit who (a) where the purpose land-use operation is in the exercise of a right to search for, win or exploit minerals or natural resources, (i) holds the right.*

Applicant holds Prospectors Licence N34874 and the following mineral claims: KAP 1-6 M12414; M12415; M12416; M12417; M12418; M12420.

5.2 Type of Area

The project is located on Territorial Lands.

5.3 Water Management Area

Integral Metal Corps. project is located northwest of the Ravens Throat River - Tátsó'k'áá Dee and intends on drawing water from this location and a second order stream that feeds into the Ravens Throat River. All water usage will be under the 99m³/day trigger for a Type B Water Licence.

5.4 Fees

Integral Metals Corp. has submitted their \$150 application fee.

5.5 Term

Integral Metals Corp. has requested a term length of five years and will possibly seek out an extension of the permit in the future if required.

5.6 Triggers

The activities as described trigger a type A permit in accordance with 4(a)(ii), 4(a)(iv), 4(b)(i), 4(b)(ii):

4(a)(ii) No person shall, without a Type A permit, carry on any activity that involves (a) on land outside the boundaries of a local government, (ii) the use of a vehicle or machine of a weight equal to or exceeding 10 t, other than on a road or on a community landfill, quarry site or airport.

4(a)(iv) No person shall, without a Type A permit, carry on any activity that involves (a) on land outside the boundaries of a local government, (iv) the use of a self-propelled motorized machine for moving earth or clearing land.

4(b)(i) No person shall, without a Type A permit, carry on any activity that involves (b) on land within or outside the boundaries of a local government, (i) the use of motorized earth-drilling machinery the operating weight of which, excluding the weight of drill rods, stems, bits, pumps and other ancillary equipment exceeds 2.5 t, for a purpose other than the drilling of holes for building piles or utility poles or the setting of explosives within the boundaries of the local government.

4(b)(ii) No person shall, without a Type A permit, carry on any activity that involves (b) on land within or outside the boundaries of a local government, (ii) the use of a campsite outside a territorial park for a duration of or exceeding 400 person-days.

5.7 Management Plans Submitted with the Application

The following Management Plans and Studies were submitted with the Application:

- Engagement Plan and Record
- Waste Management Plan (WMP)
- Spill Contingency (SCP) and Emergency Response (ERP) Plans
- Closure and Reclamation Plan (CRP)
- Wildlife and Archaeology Protection Plan (WAPP)

6. Public Review of the Applications

Of the 37 organizations to which the Application was distributed, 15 are represented within the Sahtu Settlement Area. Review Comments were received from:

1. Government of Canada – Department of Environment and Climate Change Canada
2. Government of the Northwest Territories – Department of Education, Culture and Employment – Prince of Wales Northern Heritage Centre

The Government of the Northwest Territories – Department of Environment and Climate Change reviewed the Application and provided a no-comment letter. The Review Comment Summary Table and letters submitted during the public review are attached to this report.

6.1 Main Issues and Concerns raised during the Application Review Process

The Staff Report focuses primarily on the following key issues raised during the regulatory proceeding/public review. Issues that were resolved by Parties to the Board's satisfaction during the proceeding are not addressed in detail below.

Government of Canada – Department of Environment and Climate Change Canada

1. Spill Contingency Plan – ECCC Contact Information: ECCC recommends Integral in the case of a spill or emergency, the 24-Hour Northwest Territories Spill Report Line should be contacted first by Integral, who then will involve ECCC emergencies when appropriate. The Applicant confirmed that it had updated SCP Table 3 to include ECCC as a contact for additional information.
2. Waste Management Plan – Waste Disposal Location(s): ECCC recommends that Integral clarify whether waste will be flown to and disposed of in Yellowknife and/ or Whitehorse, in addition to Norman Wells. The Applicant confirmed that it had updated the relevant plans to specify that waste will be disposed of in Norman Wells rather than Yellowknife and/ or Whitehorse.
3. Wildlife and Archaeology Protection Plan – Species at Risk: ECCC recommends that species be assessed and listed on a regular basis and states that Integral should consult the species and risk registry to obtain the most current information for their operations and consult the GNWT to identify appropriate mitigation and/or monitoring measures to avoid or lessen project effects to species under their management responsibility. The Applicant responded that it had consulted GNWT ECC in February 2024 and submitted a screening questionnaire to the department. WAPP Table 6, 7 and Appendix II address the species at risk in the project area.
4. Wildlife and Archaeology Protection Plan – Project Activities Within Migratory Bird Habitat and During Nesting Season: ECCC recommends that Integral carries out all phases of the project in a manner that reduces risk to migratory birds and to avoid harming, killing or disturbing migratory birds or destroying, disturbing, or taking their nests and eggs. The Applicant noted that the minimum setback distances for habitats and time periods are identified in Table 6; and, in the event of a nest discovery, the Wildlife Plan has been updated to state: "If nests containing eggs or young are found, all disruptive activities should stop and a buffer zone established until nesting is completed and the young have naturally left the nest. If the nests belong to a migratory bird population, the ECCC's 'Guidelines to Avoid Harm to Migratory Birds' and the 'Fact Sheet: Nest Protection Under the Migratory Birds Regulations, 2022' will be followed, including leaving the nests for a 12-month waiting period".
5. Wildlife and Archaeology Protection Plan – Project activities in Bank Swallow habitat within its range: ECCC recommends that Integral a) take precautions to avoid disturbance to nesting Bank Swallows; b) Ensure staff and contractors are made aware of potential presence and conservation status of the Bank Swallow, c) Prevent Bank Swallows from nesting in areas where operations will be carried out during the breeding season by contouring piles to have slopes of less than 70 degrees prior to their arrival in the spring and by creating suitable nesting habitat in inactive areas with vertical faces of at least 70 degrees, and d) Take particular care in selecting erosion prevention and control measures and implement those measures prior to the nesting season. The Applicant confirmed it has updated the WAPP to include relevant bank swallow information and mitigation measures.

6. Wildlife and Archaeology Protection Plan – Project activities in Bank Swallow habitat within its range: ECCC recommends that Integral a) take precautions to avoid disturbance to nesting Barn Swallow; and b) Ensure staff and contractors are made aware of potential presence and conservation status of the Barn Swallow. The Applicant confirmed it has updated the WAPP to include relevant bank swallow information and mitigation measures.
7. Wildlife and Archaeology Protection Plan – Storage of Attractants: ECCC recommends that Integral make food, domestic wastes and petroleum-based chemicals inaccessible to wildlife at all times. The Applicant confirmed that it had considered general procedures for waste management and the importance of preventing wildlife attractants in section 8 of the WAPP and Table 4 of the WMP.
8. Wildlife and Archaeology Protection Plan – Contamination of water bodies: ECCC recommends Integral ensure that their employees are aware of plans and commitments related to storing, handling, and transporting of petroleum products and other hazardous substances and take all necessary precautions to prevent spills. The Applicant Confirmed that this information was considered in the SCP.
9. Wildlife and Archaeology Protection Plan – ECCC Contact Information: ECCC recommends that Integral notify ECCC's Canadian Wildlife Service for instances involving a) Interactions and incidents involving the potential disturbance of individuals or nests and any mortality events of these species; b) Wildlife monitoring reports and annual reports that pertain to these species; and c) Updates to wildlife management and monitoring plans, or their equivalents, in relation to these species. The Applicant confirmed that it had updated SCP Table 3 to include ECCC as a contact for additional information.

Government of the Northwest Territories – Education, Culture, and Employment – Prince of Wales Northern Heritage Centre

1. Protection of Historical, Archaeological, and Burial Sites: GNWT-ECE-PWNHC recommends that the Board retain draft conditions 47 (Archaeological Overview) and 48 (AIA-High Potential) and note that AOA reports must be received, reviewed, and approved by ECE prior to any new land disturbance and suggest that the AOA wording is changed to “At least 30 days prior to any new land disturbance.” The Applicant agreed with this recommendation.

7. Board Staff Analysis of Application and Evidence

7.1 Permission of Landowner, Community Consultations, Traditional Knowledge, Archaeological Impact Assessment and Wildlife Mitigation and Monitoring Plan

7.1.1 Permission of Landowner

The proposed project is not located within Sahtu Settlement Lands, but Integral has sought out permission to utilize Camp Dal from Raven’s Throat Outfitters.

7.1.2 Community Consultation and Engagement

Table 1: Engagement Triggers: Activities Requiring Engagement

Engagement Trigger	Purpose	Typical Methods	Typical Participants
Regular meeting annually (to bi-annually as project evolves) between Integral senior management and Indigenous Government/Community Leadership and members.	Input into the operations at the KAP project. Provide update of activities as required (completed and planned).	<ul style="list-style-type: none"> • Face-to-face meeting • Community public meeting 	<ul style="list-style-type: none"> • Community leaders • Community members
Application for new Land Use Permit or Water Use License.	Prior to application engagement allows discussion of concerns and answer and record any questions. Opportunity for community input.	<ul style="list-style-type: none"> • Face-to-face meeting • Community public meeting (as required) 	<ul style="list-style-type: none"> • Community leaders • Community members • Community technical staff • Additional local land users
Indigenous Government or Community requests for engagement.	Respond to Indigenous Government or Community requests for engagement.	<ul style="list-style-type: none"> • As appropriate to request 	<ul style="list-style-type: none"> • As appropriate to request
Indigenous Government or Community request to adhere to Indigenous Government/Community-developed Engagement Plans.	Adhere to Indigenous Government/Community-developed Engagement Plans as requested.	<ul style="list-style-type: none"> • As appropriate to request 	<ul style="list-style-type: none"> • As appropriate to request
Project-based changes (determining drill locations, changes in project design, updates to plans).	Ensure all parties are aware of any changes and allow opportunity to provide input or ask questions as required.	<ul style="list-style-type: none"> • Written notification • Face-to-face meeting 	<ul style="list-style-type: none"> • Community leaders • Community members • Community technical staff • Additional local land users

7.1.3 Traditional Knowledge

Integral Metals Corp has reached out to the Tuli'ta Renewable Resource Council, and the Norman Wells Renewable Resource Council requesting a meeting to discuss the next steps for Traditional Knowledge Study but did not receive a response back. Integral has committed to undertaking a study and incorporating any TK information into Project activities.

7.2 Management Plans

7.2.1 Waste Management Plan (WMP)

As required, the Applicant included a Waste Management Plan in the Application. No comments were received during the public review that indicated that a revision to the WMP was needed. Board staff suggest the Plan is appropriate for Project activities and can be approved.

7.2.2 Spill Contingency Plan (SCP)

As required, the Applicant included a Spill Contingency Plan in the Application. During the public review ECCC recommended that the Applicant revise the SCP to include updated contact information. The Applicant committed to the updates.

Board staff suggest the Plan is appropriate for Project activities and can be approved, but that a revised plan, containing the revisions agreed to during the public review should be submitted to the Board for conformity determination.

7.2.3 Closure and Reclamation Plan (CRP)

The Closure and Reclamation Plan has been developed with the Mackenzie Valley Land Board (MVLWB) and Aboriginal Affairs and Northern Development Canada (AANDC) Guidelines for the Closure and Reclamation of Advanced Mineral Exploration and Mine Sites in the Northwest Territories (2013).

No comments were received during the public review that indicated that a revision to the CRP was needed. Board staff suggest the Plan is appropriate for Project activities and can be approved.

7.2.4 Wildlife and Archaeology Protection Plan (WAPP)

The wildlife section of the WAPP covers what actions Integral employees will implement to avoid negative effects of the project on wildlife. The actions include setback distances, mitigation measures, monitoring procedures, waste management to reduce wildlife/human interactions. The WAPP also includes sighting forms for Integral employees to use and through the comments received on the Online Review System (ORS) more information regarding the Bank Swallow will be added to the plan.

The archaeology section of the WAPP for the KAP Project highlights the importance of protecting archaeological sites due to their historical, cultural, scientific and educational value. The objective of this section of the document is to avoid impacts to archaeological sites and promote the preservation of archaeological data while minimizing disruption of construction scheduling.

The WAPP includes what steps Integral employees will take if an archaeological site is found or suspected during the course of work. A desktop AOA will be conducted prior to any land disturbance supported by Traditional Knowledge (TK).

PWNHC has requested through the ORS that the Board retain draft conditions 47 (Archaeological Overview) and 48 (AIA-High Potential) and note that any AOA reports must be received, reviewed, and approved by GNWT-ECE prior to any new land disturbance. PWNHC has also requested the Board to include in the wording of the condition "At least 30 days prior to any new land disturbance."

Board Recommendation: Implement the suggestion made by PWNHC to include the information contained within GNWT-ECE-PWNHC Comment ID 9.

The wildlife section of the WAPP identifies species at risk, and describes the proposed wildlife mitigation measures and reporting protocols for the project.

During the public review, ECCC requested clarification and made recommendations for revisions to the plan, as discussed in section 6.1. The Applicant responded to comments and recommendations and made revisions where necessary.

Board staff suggest although the plan does not require Board approval, a revised plan, containing the revisions agreed to during the public review should be submitted to the Board for inclusion on the Public Registry.

7.3 Potential for Environmental Impacts and Mitigation Measures

7.3.1 Preliminary Environmental Screening

Notification was sent out to Preliminary Screeners through the distribution of the Application using the ORS. No significant or unmitigable public concerns have been made known to the Board during the public review.

It is the opinion of Board staff that the terms and conditions of the draft permit for S24S-004, pursuant to the MVRMA, will ensure that any potential environmental impacts resulting from this activity are not significant. The effects of the project on the environment can take place in an environmentally responsible manner provided that environmental considerations and mitigation measures outlined in the Land Use Permit Application documents and the public review are followed.

8. Security

8.1 Legislative Requirements

The draft Permit contains Condition 49 which sets out the amount of security to be deposited by the Applicant prior to commencement of the land use-operation. There is no other mechanism, other than an amendment, to change the amount of security required under a permit.

The board may require security for the Permit as per section 32 of the MVLUR, which states:

32(1) The Board may require security to be posted in the amount not exceeding the aggregate of the costs of

- (a) Abandonment of the land-use operation;*
- (b) Restoration of the site of the land-use operation;*
- (c) Any measures that may be necessary after the abandonment of the land-use operation.*

32(2) In setting the amount of security pursuant to subsection (1), the Board may consider

- (a) The ability of the applicant or prospective assignee to pay the costs referred to in that subsection;*
- (b) The past performance of the applicant or prospective assignee in respect of any other permit;*
- (c) The prior posting of security by the applicant pursuant to other federal legislation in relation to the land-use operation; and*
- (d) The probability of environmental damage or significant of any environmental damage.*

8.2 Land Use Permit Security Worksheet (LUPSW)

The LUPSW (excel based land use calculator) was developed and approved in 2004 for all smaller Projects when only a permit required. The Worksheet is very user friendly for Applicants to prepare and submit for an application. It is also easy for Board staff to prepare their own estimates, using the same Worksheet and the information provided in the Application documents, to check for errors or missing information, or to update based on information provided by other review agencies.

The Applicant has provided a security estimate for the advanced mineral exploration that is estimated to be \$36,421.88.

Board staff completed a security estimate and determined the estimate to be \$52,462.50. See Table below for rationale.

	Line Item	Applicant's Estimate	Staff Estimate	Rationale
CAMP	Temporary Structures	\$2,250	\$2,250	10 tent frames/weatherhavens 100 m ² sq meters other temp structures.
	Fixed Structures	0	0	
	Solid Waste	\$1,800	\$3,750	Applicant inputted 1200 person days on security determination, however the Application form states Expected person days is approximately 2,500 per year. Staff have updated estimate to reflect 2,500 person days.
HAZARDOUS MATERIALS	Explosives	0	0	
	Drilling Mud	\$1,000.00	\$1,000.00	
	Used oil, lubes, and antifreeze	\$1,000.00	\$1,000.00	2 pieces of heavy equipment (drills)
FUEL	Gasoline and Diesel	\$11,018.75	\$7,687.50	15375 L
	Aviation Fuel	\$11,018.75	\$7,687.50	
	Safety Feature	-\$3,843.76	-\$3,843.76	"Use of secondary containment"
LAND DISTURBANCE	Disturbed Surface Area	\$1,000.00	\$1,000.00	

	Line Item	Applicant's Estimate	Staff Estimate	Rationale
	Other Land Disturbances	\$600	\$600	Off Road activities and Sump factor 10 m2
EQUIPMENT	Heavy Equipment	\$2,000.00	\$2,000.00	2 pieces equipment
	Drills	\$2,000.00	\$2,000.00	2 drills
	Light Vehicles	\$500.00	\$500.00	2 snowmobiles or 2 boats
	Small Generator/pumps	\$600.00	\$600.00	6 generators/pumps
	Empty Fuel Storage Tanks	\$0	\$0	No empty fuel tanks
PRELIMINARY CALCULATION		\$24, 281.25	\$26,231.25	
MULTIPLIERS	Site Access	2	2	Air Access
	Performance	1	1	No previous LUP
	Environmental Risk	0.75	1	Applicant inputted a multiplier of 0.75, which indicates previously disturbed land. Application: <i>"Integral intends on setting up a temporary camp as their base of operations for the exploration activities, possibly positioned where the camp utilized by Fire Steel Resources was located between 1995 and 1998. Camp capacity will not exceed 30 people and will average around 15 occupants for most of the program. Permission has also been obtained from Raven's Throat Outfitters to utilize Camp Dal, located approximately 20 kilometers southeast of the project, as a secondary camp and fuel cache staging area to minimize the frequency of helicopter flights and reduce environmental impacts"</i> . Staff notes that drill sites will be on undisturbed lands, that the camp may "possibly" be located on a former camp

	Line Item	Applicant's Estimate	Staff Estimate	Rationale
				location, and that the campsite has not been
	TOTAL	\$38,421.88	\$52,462.50	

Board staff recommend that the Board either set security at [\$36,421.88 or \$52,462.50] as described in the permit Security Estimate Worksheet for the following reasons, or decide not to take security:

- The Project is unlikely to have adverse effects on the receiving environment.
- The Project is secured higher than other mineral exploration projects in the Mackenzie Mountains of larger scale.
- The Applicant has no previous regulatory history within the Sahtu.

9. Draft Authorizations

A Permit was circulated during the public review. Board staff have revised the permit based on the comments and recommendations received during the public review. Please see attached document showing tracked changes.

10. Conclusion

The Preliminary Environmental Screening Report did not identify any Significant Adverse Environmental Impacts or Public Concerns with the proposed project. All potential environmental impacts can be mitigated with known technology and have been addressed in the Terms and Conditions of the Land Use Permit.

A draft land use permit has been prepared based upon the standard conditions. Board staff conclude that the conditions contained within its draft permit should mitigate the potential environmental impacts this development may have on the land and water.

11. Recommendations

Board staff recommend the Board:

- Make a motion to approve the preliminary screening** of the Application for Land Use Permit S24C-004 from Integral Metals Corp.;
- Make a motion to approve the Type A Land Use Permit S24C-004** for a term of five (5) years **and associated Reasons for Decision**;
- Make a motion to approve the Waste Management Plan** (Version 1.0) as required by Land Use Permit S24C-004;

- d) **Make a motion to approve the** Spill Contingency Plan (Version 1.0) as required by Land Use Permit S24C-004, and further require Integral to submit a revised plan, containing the commitments and revisions agreed to during the public review, to the Board for conformity determination.
- e) **Make a motion to approve the** Engagement Plan (Version 1.0) as required by Land Use Permit S24C-004;

12. Reference Material/Attachments

- **Review Comment Summary Table and Attachments;**
- **Draft Preliminary Screening Determination and Reasons for Decision;**
- **Draft Notification Letter to Review Board re 10-day pause period;**
- **Draft Security Estimate;**
- **Draft Land Use Permit Cover Page;**
- **Draft Land Use Permit Conditions;**
- **Draft Reasons for Decision; and**
- **Draft Decision Letter from the Board**

Respectfully submitted,

Reviewed by:

Approved by:



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