



P.O. Box 1500
4923 – 52nd Street - Gallery Building
Yellowknife, NT X1A 2R3

May 24, 2024

Natalie Lipka, Regulatory Specialist
Sahtu Land and Water Board
Box 1
Fort Good Hope, NT X0E 0H0

RE: Great Bear Lake Sites Remediation Project – Water Licence Renewal Application

Dear Natalie,

Crown-Indigenous Affairs and Northern Development Canada (CIRNAC) - Contaminants and Remediation Division's (CARD) is pleased to provide the attached application for a Water Licence renewal to replace current Water Licence S17L8-002 for the Great Bear Lake (GBL) Sites Phase II Remediation Project. The current Water Licence expires July 24, 2024 and CIRNAC respectfully requests a 3-year licence be issued prior to expiration by the Sahtu Land and Water Board (SLWB).

Please note that CIRNAC has also submitted a request for renewal for the associated Land Use Permit at the project sites (S17D-003).

Contents of Application

In addition to this cover letter, the Water Licence application package includes a series of appendices (documents produced/provided in support of the application) and annexes (stand-alone deliverables which may be consulted for additional information if necessary). An itemized list of the application package is provided as follows:

- Completed Application Form – Includes updates, remedial activities conducted to date, pending remedial work and environmental considerations
- Appendix A: Sahtu Land Use Plan Conformity Table – The GBL Sites Phase II Remediation Project Application as assessed against the requirements of the Sahtu Land Use Plan
- Appendix B: Site Maps – General overview maps, site specific maps (1:50k) and mineral title maps
- Appendix C: Proposed Transportation Route Maps - Proposed access routes for the project sites
- Appendix D: Design Drawings – Design drawings for each of the sites, documenting the remedial scope and general requirements
- Appendix E: Engagement Plan and Log – Description of the commitments and approach to engagement and log of activities conducted to date
- Appendix F: Spill Contingency Plan – Outlining the minimum standards for spill contingency planning at the project sites
- Appendix G: Waste Management Plan – Provides the general approach and minimum standards for waste management at the project sites
- Appendix H: Wildlife Management Plan – Presents approaches to minimize impacts to wildlife,

manage wildlife incidents and response approaches

- Appendix I: Proposed Mitigation Measures for Winter Road and Barge Activities – Supplemental list of mitigation measures to reduce environmental effects of barge and road transport
- Appendix J: List of Studies and Reports – Provides complete listing of studies and reports at the GBL Sites
- Appendix K: 2017 Water Licence Renewal Application [S17L8-002]
- Appendix L: 2017 Land Use Permit Renewal Application [S17D-003]
- Appendix M: Pre-Remediation Monitoring Plan
- Appendix N: Quality Assurance and Quality Control Plan
- Appendix O: Remedial Action Plans
 - O-1: Silver Bear Mines Remedial Action Plan
 - O-2: Contact Lake Mine Remedial Action Plan
 - O-3: El Bonanza Mine Remedial Action Plan
 - O-4: Sawmill Bay Remedial Action Plan

Project Governance

In 2021, CIRNAC and the Délı̨ne Got'ı̨ne Government (DGG) signed a formal Governance Agreement. Project activities presented within this Water Licence application were developed by CIRNAC. Discussions were held with the Operations Committee and representatives of the DGG in developing this water licence application.

Scope of Application

Select remedial activities identified in the previous water licence are being re-evaluated by the Co-Management Team to confirm alignment with the principles of the Governance Agreement and have not been included in the current application package. Consequently, the current Water Licence Application package is a reduction from the scope included in previous applications.

Certain remedial activities are not within the scope of the applications because their remedial approach have not yet been confirmed by the Co-Management Team, including but not limited to:

- tailings management;
- contaminated soils remediation;
- waste rock management at Silver Bear Mines; and
- Terra Mine landfill construction.

Although these activities have been removed from the scope of these applications, they still remain in the appended Remedial Action Plans for information purposes only.

Additional application(s) will be provided to the SLWB once the remaining remedial scope has been finalized by the Co-Management Team. The licence renewal should be restricted in its term until such time that all remedial scope is finalized.

Licence Term

CIRNAC is applying for a water licence term of 3 years, which would extend to approximately July 2027. Once the full scope of remediation is finalized, CIRNAC will then apply for a licence for the full term of remediation (see Table 1 for Project Schedule). This current application is required to allow CIRNAC the ability to continue with pre-remediation work, as well as commence certain components of remediation as described in the Scope of Application above, and further detailed in the application form. In the interim, CIRNAC may apply for amendments to this water licence once approved as agreement is reached

between CIRNAC and the DGG on outstanding remediation elements.

Preliminary Screening

Although the scope of activities is a reduction from the scope included in previous applications, all scope included in this application remains unchanged from previous applications and was part of the previous preliminary screening (and subsequently exempted in later licence applications).

In keeping with these factors, CIRNAC respectfully requests that the Board consider the license renewal to be exempt from a Preliminary Screening as per as per Part 5 Exemption List Regulations in the Mackenzie Valley Resource Management Act and Regulations. Additional information related to the exemption is provided in the appropriate sections of the application forms.

Application Fee

With respect to the application fee, under the *Mackenzie Valley Land and Resource Management Act*, it states that "7. *This Act is binding on Her Majesty in right of Canada or a province, except that Her Majesty in right of Canada is not required to pay any fee prescribed by regulations made under paragraph 90.3(1)(k) or subparagraph 90.3(2)(a)(i).*"

Contaminated Site Considerations

Remediation of contaminated sites presents unique considerations during planning processes. For example, unlike greenfield developments at which the location of work activities may be selected to accommodate setbacks and other similar restrictions, the remedial actions at historic sites must address environmental concerns and physical hazards where found, including proximity to waterbodies. Similarly, the temporary camps required to complete site remediation will be installed within the footprint of historic operations. While these footprints may be within modern setbacks, this approach will prevent incremental clearing and subsequent impacts.

CIRNAC has reviewed recent SLWB and Mackenzie Valley Land and Water Board (MVLWB) Terms and Conditions for Water Licences to identify any deviations which may be required to successfully remediate the GBL Sites. CIRNAC requests the board to consider the following:

- Remedial work is required to naturalize shorelines and remove potential contaminant sources adjacent to and/or within waterbodies. CIRNAC requests that approved remedial work identified within the Remedial Action Plans (RAPs) are provided with a setback exemption.
- As with other contaminated site remediation projects, CIRNAC will install temporary camp facilities within the disturbed footprint of the historic operations. As much as possible, camp facilities will be located greater than 100 m from a waterbody. However, at some sites, the most suitable cleared area is less than this distance (e.g. El Bonanza/Bonanza). CIRNAC requests that camp setback distance not be defined within a licence condition, but rather be established within the Camp Plan.
- Fuel storage areas will in some locations be required near to float plane and barge/boat docking areas. Daily transport of fuel to/from these locations is estimated to be a greater potential risk than proper fuel storage. CIRNAC request an allowance to permit fuel storage within these select locations and will employ secondary containment (e.g. insta-berms).

Surveillance Network Program

CIRNAC recommends that the SNP from water licence S17L8-002 be carried forward into the renewed water licence, including all stations and their sampling frequencies. The full scope of monitoring is included in the approved Pre-Remediation Water Quality Monitoring Plan, which has remained unchanged since

the previous submission.

Community Engagement

CIRNAC and understands the importance of consultation with local communities and stakeholders and has presented a log of these activities within the Engagement Plan and Log (Appendix E).

Project Schedule

Table 1 – Proposed Project Schedule

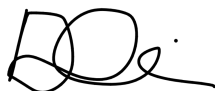
TASK	2024	2025	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035
Approvals and Procurement												
Permit Renewals	█											
Funding Approvals		█										
Contracting/Procurement		█	█									
Remediation												
Mobilization				█								
Active Remediation				█	█	█	█	█	█	█	█	█
Demobilization											█	█
Monitoring												
Pre-Remediation	█	█	█	█								
Remediation					█	█	█	█	█	█	█	█
Post-Remediation Monitoring												█
Status of Environment												█

The schedule for the future phases of the project is subject to Treasury Board funding approvals. However, CIRNAC anticipates the larger remediation phase to commence in 2027. SLWB will be provided with information once there is more certainty in the project schedule.

CIRNAC estimates an approximate duration of 8 years to complete the active remediation of the project sites (2027-2034). It is assumed that shutdown will occur annually over the winter (approximately five months). In the interim, the CIRNAC and the DGG are focused on finalizing any outstanding remediation scope items, receiving necessary funding approvals, and procurement.

If the SLWB has any questions or concerns, please do not hesitate to contact the designated Project Manager, Joel Gowman by email at joel.gowman@rcaanc-cirnac.gc.ca or by phone at 867-445-3157 or the Project Officer, Murray Somers by email at murray.somers@rcaanc-cirnac.gc.ca or by phone at 867-445-2824.

Respectfully Submitted,



Dawn Keim
 A/Senior Manager
 Contaminants and Remediation Division