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March 10, 2025

File: S25C-001

Derrell Beaulieu
Denendeh Exploration and Mining Company Limited
4504 – 49th Avenue, Denendeh Manor #401
Yellowknife, NT X1A 2R1

Sent by email

Dear Derrell Beaulieu,

Re: Denendeh Exploration and Mining Company Limited (DEMCo) – Issuance Package – Land Use Permit S25C-001 – [Mining Exploration – Great Bear Lake, NT]

The Sahtú Land and Water Board (Board) met on February 21, 2025 and considered the Application Package from DEMCo for Land Use Permit (Permit) S25C-001 for the Camsell River Project (Project) in accordance with the *Mackenzie Valley Resource Management Act* (MVRMA).

The Board has approved Land Use Permit S25C-001 (attached) for a term of five years, effective March 10, 2025 and expiring March 9, 2030. The Permit is supported by the Board's Reasons for Decision. These documents are posted to the Board's Public Registry.¹

Security Deposit

¹ See SLWB Online Registry www.slwb.com for S25C-001.

A security deposit is required prior to commencement of Project activities, as per Permit Condition #47, SECURITY DEPOSIT and subsection 32(3) of the Mackenzie Valley Land Use Regulations. The security deposit is **payable to the Government of the Northwest Territories (GNWT)** and should be submitted to the following individual, to whom questions regarding security should also be directed:

Don Arey, Superintendent, Land and Water – Beaufort Delta
 GNWT – Department of Environment and Climate Change (GNWT-ECC)
 Bag Service #1
 Inuvik, NT X0E 0T0
 Phone: 867-678-8090

Submission Requirements

Please refer to Attachment A of the Permit for a complete summary and timetable of submissions required for the Permit. The Board’s decisions on submissions that were considered in conjunction with the Application Package are set out below.

Management Plans – Approved

The Board has approved the following Plans:

Condition Number and Title	Title of Plan (Version)
#37, WASTE MANAGEMENT PLAN	Waste Management Plan (V1.1) ²
#58, SPILL CONTINGENCY PLAN	Spill Contingency Plan (V1.1) ³
# 66 CLOSURE AND RECLAMATION PLAN	Closure and Reclamation Plan (V1.0) ⁴
# 75 ENGAGEMENT PLAN	Engagement Plan (V1.1) ⁵

Management Plans – Supplemental

The Board has considered and acknowledged the following plans with support from external reviewers:

Condition Number and Title	Title of Plan (Version)
#73, WILDLIFE ARCHAEOLOGY AND ENVIRONMENTAL MANAGEMENT PLAN	Wildlife Archaeology and Environmental Management Plan (V1.1) ⁷
#74 WILDLIFE MANAGEMENT AND MONITORING PLAN	Wildlife Management and Monitoring Plan (V 1.0)

Inspectors

The Inspectors referred to in the Permit can be contacted at the regional GNWT-ECC offices.⁶

² See [SLWB](#) Online Registry for Camsell River Project – [Waste Management Plan](#) – Version 1.0 – Jan 9_25.
³ See [SLWB](#) Online Registry for Camsell River Project – [Wildlife Archaeology and Environmental Management Plan](#) – Version 1.0 – Jan 9_25.
⁴ See [SLWB](#) Online Registry for Camsell River Project – [Spill Contingency Plan](#) – Version 1.0 – Jan 9_25.
⁵ See [SLWB](#) Online Registry for Camsell River Project – [Engagement Plan](#) – Version 1.0 – Jan 9_25.
⁶ See GNWT-ECC Regional Offices webpage (<https://www.ecc.gov.nt.ca/en/regional-offices>) for regional contact information.

Permit Processes and Additional Information

The Board has noted in the application that geotechnical drilling investigations are anticipated following preliminary exploration activities. The Applicant noted that an amendment to the Permit would be requested later. The scope of a Permit cannot be modified by amendment, only conditions. The Board has therefore added borehole drilling into the scope of the Permit to and included a new condition # 5 LOCATION OF DRILL HOLES (BOREHOLES) - Prior to the commencement of the geological borehole drilling investigation, the Permittee shall submit to the Board and an Inspector, for approval, the results of the geological prospecting, sampling, geophysical surveying, and geochemical analysis. When the Permittee is ready to complete drilling, an amendment to the Permit conditions may be requested.

Sections 5 and 6 of the Land and Water Board (LWB) *Guide to the Land Use Permitting Process*⁷ (Guide) contain detailed information on permit enforcement and potential post-issuance processes, such as amendments to conditions, and assignment to another company. Please be familiar with these sections of the Guide and reach out to Board staff with any questions about LWB processes related to the Permit.

Full cooperation of Denendeh Exploration and Mining Company Limited (DEMCo) is anticipated and appreciated. Please contact Bonnie Bergsma via email or at (867) 496-2778 with any questions or concerns regarding this letter.

Yours sincerely,



Valerie Gordon
Chair, Sathú Land and Water Board

BCC'd to: Deline Distribution List
DEMCo – Darrel Beaulieu
Jeff Walker– Inspector, GNWT-ECC
Rick Walbourne – Director, Regulatory and Permitting – GNWT-ECC
Don Arey– GNWT-ECC

Attached: Land Use Permit S25C-001
Reasons for Decision

¹⁰ See [SLWB Policies and Guidelines webpage](#) for LWB [Guide to the Land Use Permitting Process](#).



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Reasons for Decision

Issued pursuant to paragraphs 22(2)(a) and 40(2)(c) of the Mackenzie Valley Land Use Regulations (MVLUR).

Land Use Permit Application	
File Number	S25C-001
Company	Denendeh Exploration and Mining Company Limited (DEMCo)
Project	Camsell River Project
Location	Great Bear Lake, NT
Activity	Mining Exploration
Date of Decision	February 21, 2025

Table of Contents

1.0 List of Defined Terms and Acronyms.....3

2.0 Summary of Application.....4

3.0 Main Issues Raised During the Regulatory Proceeding.....5

4.0 Regulatory Process.....5

5.0 Legislative Requirements Related to Permit Issuance.....5

5.1 Consultation, Engagement, and Public Notice6

5.2 Eligibility for Land Use Permit.....7

5.3 Land Use Plan Conformity7

5.4 Land Use Fees7

5.5 Time Limit8

5.6 Environmental Review (Part 5 of the MVRMA).....11

5.6.1 Preliminary Screening8

6.0 Decision – Land Use Permit [File Number]8

6.1 Term of Permit.....9

6.2 Part A: Scope of Permit.....9

6.3 Part B: Definitions9

6.4 Part C: Conditions Applying to All Activities9

26(1)(a) Location and Area10

26(1)(b) Time10

26(1)(c) Type and Size of Equipment10

26(1)(d) Methods and Techniques10

26(1)(e) Type, Location, Operation of All Facilities10

26(1)(f) Control or Prevention of Ponding of Water, Flooding, Erosion, Slides, and Subsidence
of Land10

26(1)(g) Use, Storage, Handling, and Ultimate Disposal of Any Chemical or Toxic Material10

26(1)(h) Wildlife and Fish Habitat10

26(1)(i) Storage, Handling, and Disposal of Refuse or Sewage11

26(1)(j) Protection of Historical, Archaeological, and Burial Sites11

26(1)(k) Objects and Places of Recreational, Scenic, and Ecological Value12

26(1)(l) Security Deposit.....12

26(1)(m) Fuel Storage.....13

26(1)(n) Methods and Techniques for Debris and Brush Disposal14

26(1)(o) Restoration of the Lands14

26(1)(p) Display of Permits and Permit Numbers15

26(1)(q) Biological and Physical Protection of the Land15

6.5 Annex A: Table of Submissions15

6.6 Annex B: Table of Revision History15

7.0 Conclusion.....15

On February 21, 2025, the Sahtú Land and Water Board (SLWB or Board) met and considered the Application made by Denendeh Exploration and Mining Company Limited (DEMCo) (Applicant) to the Board on January 06, 2025 for Land Use Permit (Permit) S25C-001 for the Camsell River Project (the Project) in the Great Bear Lake, Sahtú Settlement area. After reviewing the Application and the evidence gathered during the regulatory proceeding, the Board has made the following decisions:

- 1) To issue Land Use Permit S25C-001 for a term of 5 years;
- 2) To approve Version 1.0 of the:
 - a. Engagement Plan,
 - b. Closure and Reclamation Plan.
- 3) To require revisions to Version 1.1 of the
 - a. Waste Management Plan,
 - b. Spill Contingency Plan,
 - c. Wildlife, Archeology, Environmental Management Plan.

which the Applicant must submit as Version 1.1 of the Plan within 90 days of the effective date of the Permit for a conformity confirmation.

These Reasons for Decision set out the Board’s regulatory process for the Application and rationale for decisions regarding the Permit. A summary of the Application and the main issues identified during the proceeding is provided in sections [2.0](#) and [3.0](#) below, followed by an outline of the regulatory process for the Application in [section 4.0](#). [Section 5.0](#) describes how the applicable legislative requirements have been met. The Board’s decisions and supporting rationale regarding the Permit are set out in [section 6.0](#).

1.0 List of Defined Terms and Acronyms

Applicant/Permittee	Denendeh Exploration and Mining Company Limited (DEMCo)
Application	The complete application package submitted by the Applicant for Land Use Permit S25C-001.
CanNor	Canadian Northern Economic Development Agency
CIRNAC	Crown-Indigenous Relations and Northern Affairs Canada
CRP	Closure and Reclamation Plan
DFO	Fisheries and Oceans Canada
DIAND	Department of Indigenous Affairs and Northern Development
Distribution List	The list of individuals and organizations to whom materials from this regulatory proceeding were circulated. ¹
EA	Environmental Assessment
ECCC	Environment and Climate Change Canada
GLWB or Board	Gwich’in Land and Water Board
GNWT	Government of the Northwest Territories
GNWT-ECC	Government of the Northwest Territories – Environment and Climate Change

¹ To access the Distribution List, see the LWBs’ Online Review System for Denendeh Exploration and Mining Company Limited (DEMCo) – [New LUP Camsell River](#) – Feb 6_25.

IR	Information request
Inspector	An Inspector designated under subsection 84(1) of the Mackenzie Valley Resource Management Act
LWBs	Land and Water Boards of the Mackenzie Valley
MVEIRB	Mackenzie Valley Environmental Impact Review Board
MVLUR	Mackenzie Valley Land Use Regulations
MVLWB or Board	Mackenzie Valley Land and Water Board
MVRMA	Mackenzie Valley Resource Management Act
Minister	Minister of the Government of the Northwest Territories – Environment and Climate Change
ORS	Online Review System (https://new.onlinereviewssystem.ca/reviews)
Party	As per the LWB Rules of Procedure , an applicant, a person, or an organization participating in this regulatory process.
Permit	Land Use Permit S24C-001
Project	Camsell River Project, the undertaking as described in Part A of the Permit.
Review Board	Mackenzie Valley Environmental Impact Review Board
SCP	Spill Contingency Plan
SLWB or Board	Sahtu Land and Water Board
Standard Permit Conditions	LWB Standard Land Use Permit Conditions Template
TG	Tłı̨chǫ Government
WMP	Waste Management Plan

2.0 Summary of Application

On January 06, 2025, the Applicant submitted an application for a new Permit S25C-001 (the Application).² The Application is to conduct mining exploration for minerals and rare earths in the Southeastern area of the Great Bear Lake. These activities are located within the Sahtu Settlement Area, Deline District. DEMCo holds mineral claims in the project area, making them eligible for a permit under the Mackenzie Valley Land Use Regulations.

In making its decision and preparing these Reasons for Decision, the Board has reviewed and considered:

- 1) The Permit Application as submitted by the Applicant for the Project;
- 2) The evidence and submissions received by the Board from the Applicant in relation to the Permit; and
- 3) The comments and recommendations, evidence, and submissions received by the Board from Parties during this regulatory proceeding.

² See [SLWB Online Registry for Camsell River Project](#) – Permit Application – Jan 6_25.

3.0 Main Issues Raised During the Regulatory Proceeding

These Reasons for Decision focus primarily on the following key issues raised during this regulatory proceeding:

- 1- DFO requesting the standards for Wildlife archeology and environmental management plan be followed very precisely.
- 2- CIRNAC requested the updating of the Waste management and spill contingency plans to reflect missing details such as data, definitions, and maps.
- 3- PWNHC requested the revision of some wording to add a step for caution for archeological sites, and a wording correction pertaining to them.
- 4- ECCC requested the Wildlife archeology and environmental management plan specify in more details how to mitigate effects on species at risk.

Issues that were resolved by Parties to the Board's satisfaction during the proceeding are not addressed in detail in these Reasons.

4.0 Regulatory Process

On January 6, 2025, the Applicant submitted the Application. On January 14, 2025, the Application was deemed complete and circulated to the Distribution List for public review on the Online Review System (ORS).³

As part of the public review, Board staff requested comments and recommendations to assist with the Board's preliminary screening determination. To assist the Board in making its decision on the Permit, Board staff also circulated a draft Permit for review with the Application to allow all Parties the opportunity to comment on the specific wording of the draft conditions.

By February 5, 2025, the Board received comments and recommendations regarding the Application and the draft Permit from the following Parties: GWNT-ECE-PWNHC, DFO, GNWT-ECC, CIRNAC, and ECCC.

On February 21, 2025, the Board met to make decisions regarding the Application. These decisions and related reasons are described in sections [5.0](#) and [6.0](#) below.

5.0 Legislative Requirements Related to Permit Issuance

The Project is subject to the [MVRMA](#) and the [MVLUR](#). As per the [MVLUR](#), the proposed use of land for the Project requires a permit. The required permit for this Project is within the Board's jurisdiction as per subsections 59(1) and 102(2) of the [MVRMA](#).

³ See [SLWB](#) Online Review System for [Camsell River Project](#) – Feb 6_25.

In conducting its regulatory process for the Application (as described in sections [3.0](#) and [4.0](#) above), the Board has ensured that section 62 of the [MVRMA](#) and all applicable legislative requirements have been satisfied as outlined in the subsections below. The Board has considered the people and users of the land and water in the Mackenzie Valley, and any Traditional Knowledge and scientific information that was made available to the Board during the regulatory proceeding, as per section 60.1 of the [MVRMA](#). The consideration of information provided to the Board is discussed in detail below and in section [6.0](#).

5.1 Consultation, Engagement, and Public Notice

As per paragraph 60.1(a) of the [MVRMA](#), in exercising its authority, the Board must consider the importance of conservation to the well-being and way of life of Indigenous peoples of Canada, specifically those to whom section 35 of the *Constitution Act*, 1982, applies and who use an area of the Mackenzie Valley. Accordingly, the Board works with applicants, affected parties (including Indigenous governments and organizations), and other parties (such as other boards and regulators) to ensure that potential impacts of proposed projects, including impacts on rights under section 35, are understood and carefully considered before decisions are made with respect to the issuance of permits and licences.

The Board's requirements for engagement are set out in the LWB [Engagement and Consultation Policy](#) and [Engagement Guidelines for Applicants and Holders of Water Licences and Land Use Permits](#).⁴ The Policy and Guidelines were developed to ensure that the Board's obligations for achieving meaningful consultation (as set out by land claims and applicable legislation) with all affected parties, including Indigenous groups in the Mackenzie Valley, are met and engagement and consultation results clearly articulated. From November 2024, until the time of the application, January 2025. In accordance with the Policy and Guidelines, the Applicant's engagement efforts and proposed procedures are detailed in the Engagement Record and Plan (Version 1.0), respectively,⁵ submitted with the Application. The Board has approved the Applicant's Engagement Plan (Version 1.0), and the Board's reasons for this decision are described below in [section 6.3](#). Following issuance, the Applicant must continue engagement efforts as outlined in the Engagement Plan, once approved, and as required in the Permit.

The Application was posted to the Board's Public Registry and distributed through the ORS. As the Project is located in the Sahtu Settlement Area – Deline District; the appropriate organizations, governments, First Nations, and Indigenous organizations were included in the Distribution List.⁶ The Distribution List was used throughout this proceeding to circulate submissions, information, and updates relevant to the proceeding; the List was updated if needed, and (if requested) individuals with specific interests in the Project were added. More information about the proceeding for the Application is provided above in [section 4.0](#).

⁴ See [SLWB Policies and Guidelines](#) webpage to access the LWB [Engagement and Consultation Policy](#) and [Engagement Guidelines for Applicants and Holders of Water Licences and Land Use Permits](#).

⁵ See [SLWB Online Registry for Camsell River Project – Engagement Record V1.0](#) – Jan 21_25 and [Camsell River Project – Engagement Plan V1.0](#) – Jan 6_25

⁶ To access the Distribution List, see the LWBs' Online Review System for DEMCo – [Camsell River Project](#) – Feb 5_25.

In accordance with sections 63 and 64 of the [MVRMA](#), the Board is satisfied that notice of and access to copies of the Application were provided, and that a reasonable amount of time was given to communities, First Nations, and the public to participate in this proceeding and make submissions to the Board.

5.2 Eligibility for Land Use Permit

As per section 18 of the MVLUR, eligibility must be determined before the Board can issue a permit. The Applicant provided proof of rights in the Application Package to demonstrate eligibility under subparagraph 18(a)(i) of the [MVLUR](#). No issues were raised regarding eligibility during this proceeding. Based on the supporting information provided, the Board concludes that the eligibility requirements under section 18 of the MVLUR have been satisfied.

5.3 Land Use Plan Conformity

As per section 61 of the [MVRMA](#), where an approved Land Use Plan applies, the Board must confirm conformity with the Land Use Plan before issuing a permit or licence.

The *Sahtú Land Use Plan* applies in the Project area, and the Application Package⁷ included a conformity table that demonstrates how the Project meets the requirements of the Land Use Plan.

DEMCo engaged with communities and gathered Traditional Knowledge, integrating it into project design and mitigation measures. Local benefits include preferential Indigenous hiring, job opportunities, skills training, and support for community initiatives. The project complies with archaeological site protection measures and will conduct assessments if required. Water use and mitigation measures ensure no significant impact on surface or groundwater. Wildlife and habitat protection measures follow regulatory guidelines, including setbacks, monitoring, and mitigation efforts. Non-native species introduction is prevented, and sensitive species and features are protected through adherence to environmental management plans. Permafrost degradation is mitigated, and site-specific monitoring is implemented to assess effectiveness. Financial security is posted per regulatory requirements, and closure and reclamation plans are included. Engagement with Deline and Tlicho Governments ensures compliance with Great Bear Lake Watershed protection measures. No fish farming, aquaculture, or lakebed disturbances will occur. Based on the submissions made during the regulatory proceeding, the Board has confirmed that the Project conforms with the *Sahtú Land Use Plan*.

5.4 Land Use Fees

The Project is located wholly outside of federal areas, so no land-use fees apply.

5.5 Time Limit

As per section 22 of the [MVLUR](#), the Board is required to make its decision on a permit within 42 days of receiving a complete application.

5.5.1 Preliminary Screening

On February 21, 2025, the Board met and the Board has reviewed all the evidence received during the regulatory process with respect to the Preliminary Screening of the proposed Project. Based on the evidence, it is the Board's opinion that the proposed Project will not have a significant adverse impact on the environment or be a cause of public concern, as set out in paragraph 125(1)(a) of the MVRMA. The Board has therefore decided not to refer the proposed Project to Environmental Assessment.

The Board is satisfied that the requirements of Part 5 of the [MVRMA](#) have been met for the Project.

5.5.2 Environmental Assessment

6.0 Decision – Land Use Permit [File Number]

Having due regard to the facts, circumstances, and the merits of the submissions made to it, and to the purpose, scope, and intent of the [MVRMA](#), the Board has determined that Permit S25C-001 should be issued, subject to the scope, definitions, conditions, and term contained therein. The Board's determinations and reasons for this decision are set out below.

The Permit has been developed to address the Board's statutory responsibilities, to protect the receiving environment, and to address issues within the Board's jurisdiction that were identified and investigated during this regulatory proceeding.

In developing the Permit, the Board considered the LWB [Standard Land Use Permit Conditions Template](#) (Standard Permit Conditions) and included a number of these standard conditions that are relevant to the Project. As noted in [section 4.0](#), Board staff circulated a draft Permit for review to allow Parties to provide specific input to the Board on possible conditions, and the Board considered these review comments and recommendations in making its determination on the Permit conditions.

The Standard Permit Conditions have been established by the LWBs based on information from LWB policies and guidelines, other applicable guidelines and best practices, meetings with Inspectors, input from LWB staff, and feedback from a public review. Each standard condition has been evaluated against the following characteristics of an ideal condition:

- Clearly part of LWBs' authority;
- Has a clear purpose and rationale;
- Is practical and enforceable;
- Matches the scale of the project; and

- Does not conflict with existing legislation (i.e., is not less stringent).

The Standard Permit Conditions include general rationale for each standard condition, and as such, the language of any standard condition included in the Permit is only discussed in detail in the following sections of these Reasons for Decision when it specifically relates to concerns or recommendations raised during the regulatory proceeding. The Board's reasons for developing and including project-specific conditions, including discussion of any concerns and recommendations raised regarding these conditions, are detailed in the relevant sections below.

6.1 Term of Permit

The Applicant has applied for a term of 5 years for the Permit. Subsection 26(5) of the [MVLUR](#) allows for a Permit term of not more than five years. After reviewing the submissions made during this regulatory proceeding, the Board has determined an appropriate term for the Permit is 5 years.

6.2 Part A: Scope of Permit

The scope of the Permit ensures the Permittee is entitled to conduct activities which have been applied for and which have been subject to Part 5 of the [MVRMA](#). In setting out the scope of the Permit, the Board endeavoured to provide enough detail to identify and describe the authorized activities, without being unduly restrictive or prescriptive, and to allow for project flexibility, as contemplated in the Application, throughout the life of the Permit.

Based on the activities described in the Permit Application and on the scope outlined in the [Standard Permit Conditions](#), Board staff included a draft scope in the draft Permit that was circulated for public review. The Board did not receive any comments or recommendations regarding the draft scope during the proceeding, so the Board accepted it as the scope of the Permit.

6.3 Part B: Definitions

The Board defined certain terms in the Permit to ensure a common understanding of the conditions, to avoid future differences in interpretation of the Permit, to reflect Project-specific evidence, and to support consistency across licences and permits issued by the LWBs. For the most part, the Board selected applicable definitions relevant to the Project from the [Standard Permit Conditions](#).

6.4 Part C: Conditions Applying to All Activities

The LWB [Waste and Wastewater Management Policy](#) applies to the Permit, and the objectives of the Policy are protection of water quality in the receiving environment, waste prevention/minimization, and minimization of the amount of waste disposed to the receiving environment.⁸ The Permit does not

⁸ See [SLWB Policies and Guidelines](#) webpage to access the LWB [Waste and Wastewater Management Policy](#).

authorize any deposit of waste to water; however, in accordance with the Policy and these objectives, the Permit includes many conditions that are, directly or indirectly, intended to meet the objectives of the Policy. The Board is satisfied that the conditions set out in the Permit are consistent with the Policy and compliance with these conditions will ensure that waste will be minimized, managed, and disposed of in a manner that will be protective of the receiving environment. These conditions and detailed rationale are described in the sections below.

The subheadings below correspond to the headings in the conditions section of the Permit, as outlined in subsection 26(1) of the [MVLUR](#).

26(1)(a) Location and Area

The conditions included in this section are all consistent with the LWB Standard Permit Conditions.

26(1)(b) Time

The conditions included in this section are all consistent with the LWB Standard Permit Conditions.

26(1)(c) Type and Size of Equipment

The conditions included in this section are all consistent with the LWB Standard Permit Conditions.

26(1)(d) Methods and Techniques

The conditions included in this section are all consistent with the LWB Standard Permit Conditions.

26(1)(e) Type, Location, Operation of All Facilities

The conditions included in this section are all consistent with the LWB Standard Permit Conditions.

26(1)(f) Control or Prevention of Ponding of Water, Flooding, Erosion, Slides, and Subsidence of Land

The conditions included in this section are all consistent with the LWB Standard Permit Conditions.

26(1)(g) Use, Storage, Handling, and Ultimate Disposal of Any Chemical or Toxic Material

The conditions included in this section are all consistent with the LWB Standard Permit Conditions.

26(1)(h) Wildlife and Fish Habitat

The [MVLUR](#) includes provisions related to the protection of wildlife habitat; however, requirements for Wildlife Management and Monitoring Plans (WMMPs) are under the jurisdiction of the GNWT through the *Wildlife Act*. Accordingly, all applicants are directed to contact the GNWT-ECC to determine whether a WMMP, which details mitigations to reduce or eliminate impacts to applicable wildlife and wildlife habitat, is required for the project and should be submitted to the Board with a permit and/or licence application.

The Permittee included a WMMP in the Application.⁹

The Board included Condition 36 (HABITAT DAMAGE) in the Permit, which requires the Permittee to prevent damage to wildlife and fish habitat. This is a condition from the Board's Standard Permit Conditions and is intended to ensure the Permittee conducts their land-use operation in such a way as to minimize disturbance to wildlife habitat.

26(1)(i) Storage, Handling, and Disposal of Refuse or Sewage

The conditions included in this section are all consistent with the LWB Standard Permit Conditions.

WASTE MANAGEMENT PLAN – SUBMIT REVISED PLAN

All applicants must submit detailed waste management information, identifying all types of waste that will be produced by the project (including quantity and quality) and describing the disposal methods that are proposed for each type of waste. For most applicants, this will be in the form of a Waste Management Plan, developed in accordance with the LWB [Guidelines for Developing a Waste Management Plan](#),¹⁰ and licences and permits will include standard conditions regarding compliance with the Plan, as approved by the Board. The Guidelines can be applied to a wide range of projects and are intended to ensure that all waste management activities are carried out in a way that is consistent with best practices and applicable guidelines to minimize waste released from a project.

As required, the Permittee included a Waste Management Plan in the Application.¹¹ The Board considered this Plan as part of the Application Package, and its decision on the Plan is set out below.

The Board requires that the Permittee revise the Waste Management Plan and submit Version 1.1, within 90 days of the effective date of the Permit, to reflect updates as agreed to during this regulatory proceeding, to reflect the Project activities, to meet the Guidelines, and to include the minor edits and recommendations from the public review.

The Plan version 1.1¹¹ was received and deemed conform by Board staff during the 10-day pause period. A public review is not required to confirm conformity.

26(1)(j) Protection of Historical, Archaeological, and Burial Sites

The conditions included in this section are all consistent with the LWB Standard Permit Conditions.

⁹ See SLWB Online Registry for Camsell River Project – [Wildlife Management and Monitoring Plan V1.1](#) – Jan 6_25.

¹⁰ See [SLWB Policies and Guidelines](#) webpage to access the LWB [Guidelines for Developing a Waste Management Plan](#).

¹¹ See [SLWB Online Registry for Camsell Rive Project](#) – [Waste Management Plan V1.1](#) – Feb 21_25.

26(1)(k) Objects and Places of Recreational, Scenic, and Ecological Value

This section was intentionally left blank, because the Board did not require conditions in this section to satisfy its mandate and did not receive any recommendations related to this section during the review of the draft Permit.

26(1)(l) Security Deposit

This section sets out the Permittee's responsibility for all costs associated with remediation of the Project area and establishes the amount of security that must be posted and maintained by the Permittee. The conditions included in this section are all consistent with the LWB Standard Permit Conditions.

The Board is authorized to require the Permittee to provide security to the Minister by subsections 71(1) of the [MVRMA](#) and 32(1) of the [MVLUR](#). Subsection 71(3) of the [MVRMA](#) specifies how the security may be applied.

Based on the evidence regarding closure cost estimates for the Project, the Board has included a requirement for a security deposit of \$33,431.25 in the Permit. The reasons for the Board's decisions are described below.

Using the LWBs' template, the Applicant calculated a closure cost estimate of \$33,431.25 for the Project. CIRNAC also completed a closure cost estimate for the Project and calculated a total closure and reclamation cost of \$33,431.25.¹²

To better understand the closure cost estimates, the Board considered the breakdown of the estimates by line item. Table X below compares these estimates.

¹² See SLWB Online Registry for – [Camsell River Project](#) – CIRNAC – [Closure Cost Estimate](#) – Jan 6_25.

Table X: Closure Cost Estimates and Board Determinations by Line Item

Line Item	CIRNAC's Estimate	Applicant's Estimate	Rationale
Camp			
Temporary Structure	2000\$	2000\$	
Fixed Structures	750\$	750\$	
Solid Waste – non-burnable	1000\$	1000\$	
Solid Waste – burnable	500\$	500\$	
Regulated/Hazardous Materials			
Used oil, lubes, and antifreeze	1500\$	1000\$	Type of heavy equipment not specified from equipment table (Project Description Section 4.6: up to 3 generators), only 2 included in DEMCo LUP security.
Hydrocarbon Storage and Transfer			
Gasoline and Diesel	3843\$	5125\$	Project Description Section 4.4, fuel caches will be within berms, included reduction.
Safety Feature	3843\$	3843\$	
Land Disturbance			
Disturbed Surface Area	1000\$	1000\$	
Off-road activities	600\$	600\$	
Equipment			
Heavy Equipment	3000\$	2000\$	Equipment not accounted for from Project Description Section 4.6: up to 3 utility trailers; 1 incinerator; 2 channel saws
Drills	0\$	0\$	
Light Vehicles	3750\$	2000\$	Project Description Section 4.6: 1-truck; up to 6-snowmachines; 1-helicopter; up to 3-atvs; up to 4-boats.
Small Generator/ pumps	500\$	200\$	Project Description Section 4.6: up to 3-gaspowered water pumps; 1-12v or wobble pump; 1-waterax pump.
Empty Fuel Storage Tanks	0\$	0\$	
Total	33,431.25\$	30,028.13\$	

The Board is satisfied that the security requirements it has imposed ensure that sufficient financial resources will be in place in advance of any liabilities that will be incurred.

26(1)(m) Fuel Storage

The conditions included in this section are all consistent with the LWB Standard Permit Conditions.

SPILL CONTINGENCY PLAN – SUBMIT REVISED PLAN

All applicants must describe spill contingency planning. For most applicants, this will be in the form of a Spill Contingency Plan, developed in accordance with the INAC [Guidelines for Spill Contingency Planning](#),¹³ and licences and permits will include standard conditions regarding compliance with the Plan, as approved by the Board. The Plan is intended to ensure that an action plan for responses to spills and unauthorized discharges has been established to effectively control and clean up spills and unauthorized discharges, with the goal of preventing or limiting damage to the receiving environment.

As required, the Permittee included a Spill Contingency Plan in the Application.¹⁴ The Board considered the Plan as part of the Application Package, and its decision on the Plan is set out below.

The Board requires that the Permittee revise the Plan and submit Version 1.1, within 90 days of the effective date of the Permit, to reflect updates as agreed to during this regulatory proceeding, to reflect the Project activities, to meet the INAC Guidelines, and to include the minor edits recommended during the public review.

The Plan version 1.1¹⁴ was received and deemed conform by Board staff during the 10-day pause period. A public review is not required to confirm conformity.

26(1)(n) Methods and Techniques for Debris and Brush Disposal

The conditions included in this section are all consistent with the LWB Standard Permit Conditions.

26(1)(o) Restoration of the Lands

The conditions included in this section are all consistent with the LWB Standard Permit Conditions.

CLOSURE AND RECLAMATION PLAN- APPROVED

All applicants must describe closure and reclamation planning. For most applicants, this will be in the form of a Closure and Reclamation Plan (CRP), developed in accordance with the LWB/AANDC [Guidelines for the Closure and Reclamation of Advanced Mineral Exploration and Mine Sites in the Northwest Territories](#) (Closure Guidelines),¹⁵ and licences and permits will include standard conditions regarding compliance with the Plan, as approved by the Board.

As required, the Permittee included a CRP in the Application. The Board considered this Plan as part of the Application Package, and its decision on the Plan is set out below.

The Board has approved the CRP, Version 1.0 because it is appropriate for the Project activities.

¹³ See [SLWB](#) External Policies and Guidelines webpage to access the INAC [Guidelines for Spill Contingency Planning](#).

¹⁴ See [SLWB](#) Online Registry for [Camsell River Project – Spill Contingency Plan V1.1](#) – Jan 21_25.

¹⁵ See [SLWB](#) Policies and Guidelines webpage to access the LWB/AANDC [Guidelines for the Closure and Reclamation of Advanced Mineral Exploration and Mine Sites in the Northwest Territories](#).

26(1)(p) Display of Permits and Permit Numbers

The conditions included in this section are all consistent with the LWB Standard Permit Conditions.

26(1)(q) Biological and Physical Protection of the Land

The conditions included in this section are all consistent with the LWB Standard Permit Conditions.

ENGAGEMENT PLAN – APPROVED

The Board assesses engagement adequacy through the LWB [Engagement and Consultation Policy](#) and [Engagement Guidelines for Applicants and Holders of Water Licences and Land Use Permits](#), and an Engagement Plan is a standard requirement for land use permits issued by the Board. This Plan is intended to ensure adequate and effective engagement with potentially affected parties has occurred prior to the submission of the Application (in the form of the Engagement Record) and is planned for throughout the life of the Project.

In accordance with the Policy and Guidelines, the Applicant included an Engagement Record and Plan in the Application,¹⁶ and these documents were distributed for public review with the Application. The Board considered the Plan as part of the Application Package.

The Board has approved the Engagement Plan, Version 1 because it meets the requirements of the Policy and Guidelines and is appropriate for the Project activities.

6.5 Attachment A: Concordance Table of Submissions

Attachment A to the Permit contains a table that summarizes the submissions required by the Permit conditions.

6.6 Attachment B: Revision History Table

Attachment B to the Permit contains a table which identifies updates and tracks changes made to the Permit. This table is currently blank because this is a new permit, but it will be updated throughout the life of the Permit.

7.0 Conclusion

Subject to the scope, definitions, conditions, and term set out in the Permit, and for the reasons expressed herein, the SLWB is of the opinion that the activities and land use associated with the Project can be completed by Denendeh Exploration and Mining Company Limited (DEMCo) while providing for the

¹⁶ See [SLWB Online Registry for Camsell River Project – Engagement Plan V1.0](#) – Jan 6_25 and [Camsell River Project – Engagement Record V1.0](#) – Jan 6_25.

conservation, development, and utilization of waters in a manner that will provide the optimum benefit for all Canadians and in particular for the residents of the Mackenzie Valley.

Land Use Permit S25C-001 contains provisions that the Board deems necessary to ensure and monitor compliance with the MVRMA and the Regulations made thereunder, and to provide appropriate safeguards in respect of Denendeh Exploration and Mining Company Limited (DEMCo)'s use of the land as authorized by the Permit.



March 10, 2025

Valerie Gordon, Chair
Sahtú Land and Water Board

Date