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Preliminary Screening Determination and Reasons for Decision

Land Use Permit Application	
File Number	S25C-001
Company	Denendeh Exploration and Mining Company Limited (DEMCo Ltd.)
Project	Camsell River Project
Location	Camsell River Area, Délı̨ę Sahtú Settlement Area, NT
Activity	Mining Exploration
Date of Decision	February 21, 2025

1.0 Decision

In accordance with subsection 124(1) of the [Mackenzie Valley Resource Management Act](#) (MVRMA), the Sahtú Land and Water Board (SLWB or Board) met on February 21, 2025 to make a preliminary screening determination on the Application from Denendeh Exploration and Mining Company Limited (DEMCo) (Applicant) for Land Use Permit S25C-001 (Permit) for the Camsell River Project (Project).¹

The Board has decided not to refer the proposed Project to the Mackenzie Valley Environmental Impact Review Board (the Review Board) for Environmental Assessment because, based on the evidence, it is the Board’s opinion that the proposed Project is not likely to have a significant adverse impact on air, water, and/or renewable resources, and will not be a cause of public concern.

The Board’s determination, including reasons for its decision, are detailed in sections [3.0](#) and [4.0](#).

¹ The Project is the Camsell River Project which is the proposed development, where “development” is defined in Part 5 of the [MVRMA](#) as:

“any undertaking, or any part or extension of an undertaking, that is carried out on land or water and includes an acquisition of lands pursuant to the *Historic Sites and Monuments Act* and measures carried out by a department or agency of government leading to the establishment of a park subject to the *Canada National Parks Act* or the establishment of a park under a territorial law.”

2.0 List of Defined Terms and Acronyms

Applicant	Denendeh Exploration and Mining Company Limited (DEMCo)
Application	The complete application package submitted by the Applicant for Land Use Permit S25C-001.
Board	Sahtú Land and Water Board
CIRNAC	Crown Indigenous Relations and Affairs Canada
CRP	Closure and Reclamation Plan
DEMCo	Denendeh Exploration and Mining Company Limited
DFO	Department of Fisheries and Oceans Canada
EA	Environmental Assessment
ECCC	Environment and Climate Change Canada
ELF	Extreme Low Frequency
GNWT	Government of the Northwest Territories
GNWT-ECC	Government of the Northwest Territories – Environment and Climate Change
GNWT-ECE PWHHC	Government of the Northwest Territories – Education, Culture and Employment, Prince of Wales Northern Heritage Centre
IOA	Iron Oxide Apatite deposit
IOCG	Iron Oxide Copper Gold deposit
MIAC	Metasomatic Iron and Alkali Calcic
MVLWB	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 (www.new.onlinereviewssystem.ca)
Party	As per the LWB Rules of Procedure , an applicant, a person, or an organization participating in the regulatory proceeding for the Application.
Project	Camsell River Project which is the proposed development (as defined in Part 5 of the MVRMA). ²
Review Board	Mackenzie Valley Environmental Impact Review Board
SCP	Spill Contingency Plan
Standard Permit Conditions	LWB Standard Land Use Permit Conditions Template
TK	Traditional Knowledge
WMP	Waste Management Plan

² “development” is defined in Part 5 of the [MVRMA](#) as:

“any undertaking, or any part or extension of an undertaking, that is carried out on land or water and includes an acquisition of lands pursuant to the *Historic Sites and Monuments Act* and measures carried out by a department or agency of government leading to the establishment of a park subject to the *Canada National Parks Act* or the establishment of a park under a territorial law.”

3.0 Background and Scope of Screening

- January 6, 2025 – Application received;
- January 14, 2025 – Application deemed complete and review commenced;
- February 5, 2025 – Comments and recommendations due and received;
- February 17, 2025 – Responses due and received; and
- **February 21, 2025 – Application presented to the Board for decision.**

Denendeh Exploration and Mining Company Limited (DEMCo) is a wholly owned partnership with membership available to the 5 Dene regions in the NWT and all 27 Dene First Nations. DEMCo is the first ever Indigenous-owned mining exploration business in the NWT and one of the first in Canada. They are exploring metals in the Camsell River Area that comprise of iron-oxide-copper-gold (IOCG), silver-zinc-cadmium and rare earth minerals. Very few of these economic opportunities occur worldwide and DEMCo has an opportunity to evaluate this mineralization model on their Camsell River Project.

Previous early exploration work at the Camsell River Property has shown potential for Metasomatic Iron and Alkali Calcic (MIAC)-type deposits, but only one iron oxide apatite (IOA) occurrence has been identified so far. Existing airborne geophysical data has helped understand the area's structure, but higher resolution surveys are now needed to identify drill targets. Ground gravity surveys will be crucial for exploring MIAC/IOCG-type deposits. These surveys, combined with magnetic data, can define the boundaries between magnetite and hematite alterations and detect significant sulphide sections.

This early exploration project will involve:

- 1) Geological mapping, prospecting, and sampling conducted by 1-2 people walking the land to identify mineralization and associated geologic features;
- 2) Field verification of desktop data, for correct positioning of drill holes and soil sample locations;
- 3) Accurate rock identification;
- 4) Soil sampling by collecting approximately 500 grams of material from verified locations for analysis of the rock beneath the glacial till;
- 5) Geophysical surveys conducted by crews of 1-6 people carrying equipment to record geophysical data, and include:
 - a) Ground gravity surveying, at 400-meter station spacings, to identify IOCG deposits, followed by additional surveying at 200-meter spacings in specific areas;
 - b) Extreme Low Frequency (ELF) survey will be conducted in high-interest areas following gravity surveys; and
 - c) An induced polarization survey may also be required to help prioritize drilling targets.

In accordance with paragraph 125(2)(a) of the MVRMA, the Board must conduct a preliminary screening of the proposed Project to determine and report to the Review Board whether, in its opinion, the proposed Project is likely to have a significant adverse impact on air, water, and/or renewable resources, or might be a cause of public concern. The details of the Board's analysis are set out in section [4.0](#) below.

3.1 Scope of Screening

The application submitted by DEMCo for review proposes a small-scale exploration program for the Camsell River Project, involving the use of a temporary exploration camp. The camp will be equipped with insulated wall tents for accommodations and will include facilities for food preparation, office space, a kitchen, and a dry storage area. A generator shack will also be part of the camp, and a bear fence will be installed around the camp for safety. The camp is expected to accommodate 15 - 20 people during active exploration activities, which will involve geological mapping, sampling, and geophysical surveys, as well as community visits or environmental monitoring activities.

Access to the project area will be through air transport, with the use of wheel- or float-equipped aircraft from Délı̄nę or Yellowknife to the Camsell River landing strip, as well as ground transport such as snowmobiles and ATVs during winter conditions. Limited winter trails or roads may be developed to move materials between the camp and the landing site. Helicopter use will be essential for access to certain areas within the project.

Water use will be managed so that it does not exceed 10 m³/day, remaining below the 99 m³/day threshold that would require a Type B Water License. Fuel storage for the project will involve aviation fuel, diesel, and smaller quantities of gasoline and propane, with a total estimated volume of 1,200L for the initial phase of exploration. Fuel will be stored in compliance with regulations, and spill kits will be available to manage any potential spills promptly.

3.2 Public Record and Regulatory Proceeding

To assist the Board in its preliminary screening determination for the Project, the Board distributed the Application and a draft Permit for public review on January 14, 2025, inviting reviewers to provide comments and recommendations on the Application and the preliminary screening (e.g., on impacts and mitigation measures) using the Online Review System (ORS). Comments were due February 5, 2025, with responses from the Applicant due February 17, 2025. The Board received comments and recommendations from the Department of Fisheries and Oceans Canada (DFO), Government of the Northwest Territories – Environment and Climate Change and (GNWT-ECC), and Prince of Wales Northern Heritage Centre (GNWT-ECE PWNHC), Environment and Climate Change Canada (ECCC), and Crown Indigenous Relations and Affairs Canada (CIRNAC) (attached).³

Since there were no requests to extend the reviewer comment deadline, the Board is satisfied that a reasonable period of notice was given to affected communities and First Nations, as required by subsection 63(2) of the [MVRMA](#).

The Board is also satisfied that notice of the Application was provided to the Délı̄nę Got'ine Government (DGG) and that a reasonable period of time was provided for the DGG to make representations to the Board in accordance with section 63 of the [MVRMA](#).

³ See [SLWB](#) Online Registry for [Camsell River Project](#) – Review Summary Table – Feb 17_25

4.0 Potential Impacts and Proposed Mitigations

Table 1 below summarizes:

- the potential impacts of the proposed Project activities;
- any concerns about impacts or proposed mitigation measures that were identified during the regulatory proceeding and how these concerns have been addressed by the Applicant and/or using standard conditions, or non-standard conditions; and
- the Board’s analysis of the proposed mitigations.

Table 1: Potential Impacts and Proposed Mitigations for the Proposed Project

See the [SLWB Policies and Resources](#) webpage to access the LWB [Standard Land Use Permit Conditions Template](#).

Potential Impact	Activity	Proposed Mitigations <i>Description of measures to reduce potential impacts, including consideration of cumulative impacts and climate change.</i>
Abiotic Components – Land – Soil Contamination Water – Groundwater – and Mio in Water Quality Water – Surface Water – Changes in Water Quality	Equipment	- All potential impacts to the land or water can be mitigated through the Board’s Standard Conditions applicable to this Project and as outlined in the SPILL CONTINGENCY PLAN .
Abiotic Components – Land – Air	Fossil fuel combustion and burning or incineration and waste	- All potential impacts to the land or water can be mitigated through the Board’s Standard Conditions applicable to this Project and as outlined in the WASTE MANAGEMENT PLAN .
Biotic Components – Terrestrial Wildlife Habitat Direct loss or removal of habitat, dents, or nests	Direct impact on habitat related to Project footprint	All potential impacts to the land or water can be mitigated through the Board’s Standard Conditions applicable to this Project and as outlined in the SPILL CONTINGENCY PLAN, the WASTE MANAGEMENT PLAN, the WILDLIFE, ARCHAEOLOGY AND ENVIRONMENTAL MANAGEMENT PLAN . Additional standard and non-standard conditions to include are: <ul style="list-style-type: none"> ○ Migratory Bird Nest Disturbance ○ Wildlife, Archaeology and Environmental Management Plan
Biotic Components – Terrestrial	Disturbance of Wildlife -use of lick or direct impacts to mineral licks from	The Applicant proposed the following mitigations in the Application: <ol style="list-style-type: none"> 1. Avoid any direct disturbance of licks in all circumstances 2. Avoid conducting land use activities within 1 km of any known mineral lick where feasible

<p>Wildlife Habitat</p> <p>Other - Mineral Lick Potential Effects</p>	<p>Project footprint or activities</p>	<p>3. If a 1 km buffer is not feasible, work with the GNWT and appropriate Renewable Resources Board and Renewable Resource Councils to develop alternative appropriate mitigations such as:</p> <ul style="list-style-type: none"> a) avoiding any direct ground disturbance such as drilling or earthworks within 1 km b) avoiding conducting other activities (such as landing of planes) within 1 km of the lick during any lambing and calving periods c) maintaining as close to a 1 km buffer distance as is possible d) establish preferred flight routes which avoid and minimize disturbance in these areas <p>The Board has standard permit condition(s) that are typically used to mitigate the identified potential impacts.</p> <p>Additional non-standard conditions to include are:</p> <ul style="list-style-type: none"> ○ Wildlife, Archaeology and Environmental Management Plan
<p>Biotic Components – Terrestrial Wildlife Habitat</p> <p>Human Wildlife Conflicts – Potential attraction of wildlife by attractants such as food waste</p>	<p>On site storage and use of food and food waste and other potential wildlife attractants.</p> <p>Human wildlife conflicts and wildlife injury or mortality caused by Project activities or personnel</p>	<p>All potential impacts to the land or water can be mitigated through the Board’s Standard Conditions applicable to this Project and as outlined in the SPILL CONTINGENCY PLAN, the WASTE MANAGEMENT PLAN, the WILDLIFE, ARCHAEOLOGY AND ENVIRONMENTAL MANAGEMENT PLAN.</p> <p>Additional standard and non-standard conditions to include are:</p> <ul style="list-style-type: none"> ○ Migratory Bird Nest Disturbance ○ Wildlife, Archaeology and Environmental Management Plan ○ Garbage Container
<p>Biotic Components – Terrestrial Wildlife Habitat</p> <p>Other – potential helicopter and activity related disturbance</p>	<p>Use of helicopters</p>	<p>The Applicant proposed the following mitigations in the Application:</p> <ol style="list-style-type: none"> 1. Species-specific wildlife setbacks as outlined in Table 4 of the Sahtú Land Use Plan will be implemented for species that may be present in the area where feasible 2 Aircraft will routinely fly at a height of at least 650 m above the ground even when wildlife are not present, except when activities require otherwise (e.g., for take off/landing, when conducting altitude specific aerial surveys, and where required for safety) 3. Field crews will conduct a scan for wildlife prior to landing; if caribou, sheep, or bears are within 500 m or species-specific setbacks cannot be reliably maintained, the crew will be deployed in a different location 4. Helicopters will avoid landing in areas where wildlife are present where feasible 5. Helicopters will avoid hovering over wildlife when spotted 6. Preferred site access flight routes will be used where possible to minimise disturbance of wildlife such as Dall sheep and caribou 7. Noise will be limited to the extent practical through minimization of idling, unnecessary flights, and appropriate maintenance of equipment, including mufflers

		<p>8. Adhering to Government of the Northwest Territories regulations regarding wildlife harassment</p> <p>9. To the extent reasonable, activities will be conducted outside key wildlife sensitivity periods and areas, such as lambing and calving seasons/locations.</p> <p>Additional standard and non-standard conditions to include are:</p> <ul style="list-style-type: none"> ○ Habitat Damage ○ Migratory Bird Nest Disturbance ○ Wildlife, Archaeology and Environmental Management Plan
<p>Biotic Components – Aquatic Habitat</p> <p>Potential effects on water volume or fish habitat</p>	<p>Withdrawal of water from a waterbody for Project use</p>	<p>The Applicant proposed the following mitigations in the Application:</p> <ol style="list-style-type: none"> 1. Minimizing water use to the extent practical and to a cumulative daily use of no more than 10 m3 /day 2. Ensuring water withdrawal aligns with DFO and Land and Water Board guidance for the protection of fish and fish habitat, such as limiting water withdrawal to <10% of instantaneous flow or under ice water withdrawal to <10% of available water volume 3. Using smaller water pumps with flow rates below 0.150 m3/s to reduce the potential for fish entrainment or impingement 4. Equipping all water uptake lines with screens designed to prevent the impingement or entrainment of fish as outlined in DFO's Interim code of practice: End-of-pipe fish protection screens for small water intakes in freshwater 5. Following DFO's protective measures for fish and fish habitat and standard codes of practice and respect the NWT in-water works restricted activity timing windows to the extent feasible 6. Where required, seeking guidance and input from DFO through the Request for Review process. <p>Additional non-standard conditions to include are:</p> <ul style="list-style-type: none"> ○ Wildlife, Archaeology and Environmental Management Plan
<p>Cultural Components – Social and Economic Well-being</p>	<p>Project activities, purchasing, and employment</p>	<p>The Applicant proposed the following mitigations in the Application:</p> <ol style="list-style-type: none"> 1. Preferential hiring of Indigenous Sahtú staff, potential job opportunities in roles such as cook, laborer, cleaning, archaeological support, field assistant, core cutting, food preparation, geotechnical work on core, camp maintenance and set up, drilling and drill helpers, field technician roles, archaeological research assistant, and wildlife (or bear) monitoring. 2. Job benefits may include on-the-job training and skill development such as technical training for core cutting, food preparation, geotechnical work on core, camp maintenance and set up, drilling and drill helpers, and field technician roles . 3. Good and services will be preferentially sourced from local communities. 4. Support of community initiatives were requested and financially feasible. <p>Standard conditions to include are:</p> <ul style="list-style-type: none"> ○ Engagement Plan

4.1 Consideration of Potential Impacts

Based on the potential impacts and proposed mitigations identified above in Table 1, the Board considered whether the Project might have a significant adverse impact on the environment. In general, impacts of the Project on the environment can be mitigated through the use of standard permit conditions and/or project-specific conditions established by the Board as per the LWB Standard Process for Creating New Conditions. These conditions may include requirements for management and monitoring plans that provide detailed information regarding the implementation of mitigation measures and the evaluation of their effectiveness.

A draft Permit was circulated for review during the regulatory proceeding, and all Parties were given the opportunity to provide comments and recommendations on the draft conditions. In finalizing the conditions, the Board considered all the evidence provided through the regulatory proceeding.

4.2 Consideration of Public Concern

In addition to considering the potential impacts of the Project, the Board considered whether the Project might be a cause of public concern.

Based on the evidence provided during the regulatory proceeding, the Board did not identify any comments or issues that indicate that the Project is a cause of public concern.

5.0 Conclusion

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.

If the Board does not receive a notice of referral to environmental assessment by March 9, 2025, the Board can issue the Permit on March 10, 2025.



February 27, 2025

Valerie Gordon, Chair
Sahtú Land and Water Board

Date