

Review Comment Table

Board:	WLWB
Review Item:	GGL Resources Corp. Application for Type A Land Use Permit, Mineral Exploration CH Project (W2015C0003)
File(s):	W2015C0003
Proponent:	GGL Resources Corp.
Document(s):	LUP Application (3 MB) Extra Territorial Registration (35 KB) Engagement Plan - Version 1.0 (54 KB) Wildlife-Archaeological and Environmental Awareness Plan - Version 1.0 (21 KB) Spill Contingency Plan - Version 1.0 (19 MB) Waste Management Plan - Version 1.1 (453 KB) DRAFT Land Use Permit (225 KB)
Item For Review Distributed On:	Mar 9 at 18:23 Distribution List
Reviewer Comments Due By:	Mar 30, 2015
Proponent Responses Due By:	Apr 6, 2015
Item Description:	<p>GGL Resources Corp. (GGL), submitted an application for a Type A Land Use Permit to the Wekeezhii Land and Water Board (WLWB) on February 26, 2015. The purpose of this land use application is to continue conducting mineral exploration at Courageous Lake and Starfish Lake area. GGL currently holds a permit with the WLWB (W2008C0004) and is referred to as the CH Project; this land use permit will be expiring on April 20, 2015. The CH Project is located approximately 250 km north of Yellowknife. GGL currently has active mineral claims and leases covering approximately 4,200 hectares southwest of Lac de Gras, NT.</p> <p>As part of the application, GGL has also submitted:</p> <ul style="list-style-type: none"> • GGL's Engagement Plan - Version 1.0 • GGL's Spill Contingency Plan - Version 1.0

- GGL had also submitted a Waste Management Plan - Version 1.1 (see attached); this Plan was reviewed under GGL's PGB Project (W2015C0001).

In addition, a draft Land Use Permit has been included with this item for review. All standard land use permit conditions have been updated to reflect the current MVLWB's Standard Land Use Permit Conditions Template. The items highlighted in yellow are items for which Board staff are specifically requesting Inspector input. The items highlighted in green are standard conditions that have been added to this Land Use Permit.

For renewal applications to be exempt from preliminary screening, the development must not have been modified and must have previously undergone the screening/assessment process as required by Part 5 of the MVRMA. WLWB staff believe this application is exempt from preliminary screening as the proposed activities are the same as those screened on May 13, 2002.

The WLWB encourages reviewers to ask questions and provide comments and recommendations on the content of this Land Use Permit application, associated management plans, and the Draft Land Use Permit conditions.

Contact Information:

Elissa Berrill 867-765-4581
 Roberta Judas 867-713-2500

Comment Summary

GGL Resources Corp. (Proponent)			
ID	Topic	Reviewer Comment/Recommendation	Proponent Response
1	General File	Comment (doc) Cover letter for CH Project Land Use Permit - revised Spill Contingency Plan Recommendation	
Environment Canada: Devin Penney			
ID	Topic	Reviewer Comment/Recommendation	Proponent Response
10	General File	Comment (doc) Environment Canada Comment Letter Recommendation	
1	Species at Risk	Comment The Species at Risk Act (SARA) is directed towards preventing wildlife species from becoming extinct or lost from the wild, helping in the recovery of species that are at risk as a result of human activities, and promoting stewardship. The killing, harming or harassing of listed species; the damage	Apr 6: GGL is committed to these migration measures and will make all field staff,

and destruction of their residences; and the destruction of critical habitat is prohibited under SARA. The prohibitions apply to all Threatened, Endangered and Extirpated species listed on Schedule 1 of SARA on federal lands and to Migratory Birds (as defined under the Migratory Birds Convention Act) and aquatic species (as defined under the Fisheries Act) everywhere they are found. Subsection 79(2) of SARA, states that during an assessment of a project, the adverse effects of the project on listed wildlife species and their critical habitat must be identified, that measures are taken to avoid or lessen those effects, and that the effects need to be monitored. This subsection applies to all species listed on Schedule 1 of SARA. However, as a matter of best practice, EC suggests that similar consideration be given to species on other Schedules of SARA and under consideration for listing on SARA, including those designated as "at risk" by the Committee on the Status of Endangered Wildlife in Canada (COSEWIC). Table 2: Terrestrial Species at Risk (see attached cover letter) lists species that may be encountered in the project area that have been designated as at risk by COSEWIC as well as their current listing on Schedules 1, 2 and 3 of SARA (and designation if different from that of COSEWIC). This list may not include all species identified as at risk by the Territorial Government. It does not include aquatic species, which are under the responsibility of Fisheries and Oceans Canada.

Recommendation For any Species at Risk that could be encountered or affected by the project, the Proponent should note any potential adverse effects of the project to the species, its habitat, and/or its residence. All direct, indirect, and cumulative effects should be considered. Refer to species status reports and other information on the Species at Risk registry at www.sararegistry.gc.ca for information on specific species as well as the booklet "Species at Risk in the Northwest Territories" (2014 Edition) available at www.nwtspeciesatrisk.com/en/Documents. As new species may have been assessed by COSEWIC or added to Schedule 1 of SARA since the booklet was last published, Proponents should always check the Species at Risk registry to obtain the most current information. If Species at Risk are encountered or affected, the primary mitigation measure should be avoidance. The Proponent should avoid contact with or disturbance to each species, its habitat and/or its residence. Monitoring should be undertaken by the Proponent to determine the effectiveness of mitigation and/or identify where further mitigation is required. As a minimum, this monitoring should include recording the locations and dates of any observations of Species at Risk, behavior or actions taken by the animals when project activities were encountered, and any actions taken by the Proponent to avoid contact or disturbance to the species, its habitat, and/or its residence. This information should be submitted to the appropriate regulators and organizations with management responsibility for that species, as requested. The Territorial Government should be consulted to identify other appropriate mitigation and/or monitoring measures to minimize project effects to species under their management

including contractors, aware of them and will provide advice/training on how to implement these measures. GGL's staff/contractors will endeavor to record general wildlife sightings using the "Wildlife Observation" form provided by GNWT - ENR. GGL will submit completed forms to ENR at the end of each field operating season and copies can be obtained directly from them.

		responsibility. Mitigation and monitoring measures must be taken in a way that is consistent with applicable species at risk recovery strategies and action/management plans.	
2	Species at Risk	<p>Comment EC notes that the Red-necked Phalarope (a shorebird) has recently been assessed by COSEWIC as Special Concern.</p> <p>Recommendation The Proponent should ensure that extra precautions are taken to avoid any disturbance to the Red-necked Phalarope or its habitat during the limited land clearing they propose to undertake. Nests consist of a simple scrape and are constructed by creating a shallow depression in the ground and pulling vegetation overhead for enhanced concealment from above. Nests are usually located in tufts of grass and/or sedge, and sometimes sparse shrubs. Red-necked Phalaropes exhibit a strong affinity for water. Most foraging and social interactions take place in aquatic habitats. If an active Red-necked Phalarope nest is encountered during project activities, or observations of Red-necked Phalarope in the area suggest that a nest could be nearby, the proponent should avoid all activities in the area until nesting is complete.</p>	<p>Apr 6: GGL will take precautions to avoid the disturbance of the Red-necked Phalarope and its habitat.</p>
3	Species at Risk	<p>Comment EC notes that the project falls within the historical range of the Eskimo Curlew.</p> <p>Recommendation Eskimo Curlew is designated as Endangered and listed on Schedule 1 of the Species at Risk Act. There have been no confirmed sightings of Eskimo Curlew since 1963, and no unconfirmed sightings on the breeding grounds since 1992. The National Recovery Team for this species has determined that recovery is not feasible at this time. It is EC's view that, in light of its current status, there is no need for further action with respect to Eskimo Curlew. An appropriate mitigation and monitoring plan should be developed with the Proponent if it is established that this species does occur in the area.</p>	<p>Apr 6: GGL will work with Environment Canada if and when necessary to develop an appropriate mitigation and monitoring plan for the Eskimo Curlew when it is confirmed that there are sightings within GGL's permit area.</p>
4	Migratory Birds	<p>Comment Paragraph 6(a) of the Migratory Bird Regulations states that no one shall disturb or destroy the nests or eggs of migratory birds. Migratory birds, the nests of migratory birds and/or their eggs can be inadvertently harmed or disturbed as a result of many activities, including but not limited to clearing trees and other vegetation, draining or flooding land, or using fishing gear. The inadvertent harming, killing, disturbance or destruction of migratory birds, nests and eggs is known as incidental take. Incidental take, in addition to harming individual birds, nests or eggs, can have long-term consequences for migratory bird populations in Canada, especially through the cumulative effects of many different incidents.</p> <p>Recommendation To prevent detrimental effects on migratory birds, nests and eggs and help maintain sustainable populations of migratory birds, EC recommends that proponents know their legal</p>	<p>Apr 6: GGL will review EC's Incidental Take web page and the fact sheet "Planning Ahead to Reduce the Risk of Detrimental Effects to Migratory Birds and their Nests and Eggs". If nests are identified/located, GGL will follow the buffer zone distances appropriate for the</p>

		<p>obligations; avoid engaging in potential destructive or disruptive activities in key sensitive periods and locations; and develop and implement appropriate preventative and mitigation measures to minimize the risk of incidental take. Migratory birds may be found nesting from mid-May until mid-August. It is important to note that breeding periods may vary from year to year due to climatic conditions and some species may nest outside the dates provided if conditions are favorable. If nests containing eggs or young of migratory birds are located or discovered, all disruptive activities in the nesting area should be halted until nesting is completed. Any nest found should be protected with a buffer zone appropriate for the species and the surrounding habitat until the young have naturally left the vicinity of the nest. Moreover, if there are migratory bird nests where work is proposed, options like avoiding, adapting, rescheduling or relocating activities that could disturb or destroy the nests should be considered. Table 1: Set Back Distances (see attached cover letter) are recommended to define buffer zones to minimize disturbance to nests for different bird groups nesting. For further information on how to protect migratory birds and their nests and eggs when planning or carrying out project activities, consult EC's Incidental Take web page and the fact sheet "Planning Ahead to Reduce the Risk of Detrimental Effects to Migratory Birds, and their Nests and Eggs" at: www.ec.gc.ca/paom-itmb/</p>	<p>species and will be mindful of nesting areas, nesting periods and eggs.</p>
5	Waste Management Plan Section 2	<p>Comment EC is concerned with the storage of different waste types and the accessibility to wildlife. Recommendation EC recommends that food, domestic wastes, and petroleum-based chemicals (e.g., greases, gasoline, glycol-based antifreeze) be made inaccessible to wildlife at all times. Such items can attract predators of migratory birds such as foxes, ravens, gulls, and bears. Although these animals may initially be attracted to the novel food sources, they often will also eat eggs and young birds in the area. These predators can have significant negative effects on the local bird populations.</p>	<p>Apr 6: Acknowledged, GGL will work to keep food, domestic wastes and petroleum-based chemicals inaccessible to wildlife at all times.</p>
6	Waste Management Plan Section 1	<p>Comment EC is concerned with the disturbance of migratory birds by aircraft. The plan indicate that due to no permanent roads in the area access is by float or ski-equipped fixed-wing aircraft, helicopter and snowmobile only. Recommendation In order to reduce aircraft disturbance to migratory birds, EC recommends the following, subject to pilot discretion regarding safety: 1. Fly at times when few birds are present (e.g., early spring, late fall, winter) and minimize flights during particularly sensitive periods (i.e. during migration, nesting and moulting). 2. If flights cannot be scheduled when few birds are present, plan flight paths that minimize flights over habitat known or likely to have birds and maintain a minimum flight altitude of 650 meters (2,100 feet). 3. Avoid known concentrations of birds (e.g., bird colonies, moulting areas) by a lateral distance of at least 1.5 kilometers. If avoidance is not possible, maintain a</p>	<p>Apr 6: GGL will endeavor to minimize air disturbance during periods such as migrating and nesting and will abide by the restrictions when necessary. GGL will inform pilots about the known sensitive areas.</p>

		<p>minimum flight altitude of 1,100 meters (3,500 feet) over these areas. 4. Avoid areas used by flocks of migrating waterfowl by 3 kilometers. 5. Avoid excessive hovering or circling over areas known or likely to have birds. 6. Inform pilots of these recommendations and of areas known to have birds.</p>	
7	Waste Management Plan Section 3	<p>Comment Section 3 of the waste management plan indicates that a sump will be used to contain grey water.</p> <p>Recommendation EC recommends that sump construction be on flat terrain, avoiding the toe or bottom of a slope to reduce the potential for runoff water and pooling above the sump. To minimize surface disturbance within continuous/discontinuous permafrost zones, the sump should be excavated deeper rather than wider, with an adequate freeboard.</p>	Apr 6: Acknowledged.
8	Spill Contingency Plan	<p>Comment EC encourages Proponents to prepare Emergency Response Plans and Spill Contingency Plans that reflect a consideration of potential accidents and malfunctions that take into account site-specific conditions and sensitivities. The Canadian Standards Association publication, Emergency Preparedness and Response, CAN/CSA-Z731-03, is a useful reference for this.</p> <p>Recommendation EC recommends that the proponent document and provide information on worst-case accident scenarios in a manner that is consistent with one or both of the OECD Guiding Principles for Chemical Accident Prevention, Preparedness and Response, and the MIARC 2007 Risk Management Guide for Major Industrial Accidents. EC recommends that proponents assume that worst-case accident and malfunction scenarios are not only possible, but rather are likely to occur during the lifespan of the project, and that contingency plans and response capabilities be developed accordingly. OECD Guiding Principles for Chemical Accident Prevention, Preparedness and Response, 2003 No. 10, (http://www.oecd.org/env/ehs/risk-management/publicationsintheseriesonchemicalaccidents.htm)</p>	Apr 6: For this initial early phase exploration program, GGL feels that the Spill Contingency Plan that was submitted with our original application covers these issues. Details are available within the Spill Contingency Plan.
9	Spill Contingency Plan	<p>Comment Section 1.4 of the Spill Contingency Plan indicates that all fuel on site remains in standard fuel drums. Subsection 36(3) of the Fisheries Act states that, unless authorized by federal regulation, no person shall deposit or permit the deposit of any deleterious substances of any type in water frequented by fish, or in any place under any conditions where the deleterious substance may enter any such water. The legal definition of deleterious substance, as outlined in Section 34(1) of the Fisheries Act, includes any substance with a potentially harmful chemical, physical or biological effect on fish or fish habitat.</p> <p>Recommendation The following prevention/mitigation recommendations are made with respect to the transportation, storage, use and disposal of petroleum products and hazardous substances which, when employed, may minimize the risk of chronic and accidental spills and their impacts to the environment. The use of secondary containment with an impervious liner, such as self-supporting</p>	Apr 6: Recommendations acknowledged. GGL will ensure that fuel caches on the project will have secondary containment.

		<p>insta-berms, is recommended for storage of all barreled fuel rather than relying on natural depressions to contain spills. Fuel storage areas should be lined with an impervious liner as a preventative measure against potential future soil and groundwater contamination from fuel spills. Extra precaution in the installation of liners is strongly recommended since the integrity of the liner is key to preventing leaks. As for the bermed area requirements, the standard requirement is for 110% of the largest container, OR, if there are multiple containers: 100% of the largest container plus 10% of the cumulative volume of all the other containers combined. The fuel caches should be inspected on a regular basis and appropriate spill response equipment and clean-up materials (absorbents, containment devices, etc.) must be on hand during any transfer of fuel or hazardous substances and at vehicle-maintenance areas.</p>	
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GNWT - Environment and Natural Resources: Central Email GNWT

ID	Topic	Reviewer Comment/Recommendation	Proponent Response
2	General File	Comment (doc) ENR Letter with Comments and Recommendations Recommendation	
1	Topic 1: Protection of Wildlife and Fish Habitat	<p>Comment Comment(s): Based on past and current knowledge of the distribution and movement of the barren ground caribou around the CH Project, there is a very high possibility that the Bathurst caribou herd will use this area during the summer and fall during the proposed period of operation. There has been a growing concern over the protection of wildlife and wildlife habitat on project footprints. A WWHPP outline in more detail the standard operating procedures deemed necessary to protect on-site personnel, wildlife and wildlife habitat within the project footprint, including the use of road/trail access and wildlife monitoring. The WWHPP would be developed in a manner that would be appropriate to the location, scope and size of the project.</p> <p>Recommendation Recommendation(s): 1) The Permittee shall submit a Wildlife & Wildlife Habitat Protection Plan (WWHPP) to regulatory agencies for review to ensure that negative effects to wildlife and wildlife habitat within the project footprint, including any use of new and existing access roads/trails, are minimized and mitigated.</p>	Apr 6: GGL will construct and submit a Wildlife Habitat Protection Plan to the regulatory agencies for review. Due to tiime constraints, this plan will be submitted later.

GNWT - Lands: Clint Ambrose

ID	Topic	Reviewer Comment/Recommendation	Proponent Response
1	Spill Contingency Plan	<p>Comment (doc) The plan has been reviewed and appears to be missing the Immediately Reportable Spill Quantities.</p> <p>Recommendation The Spill Contingency Plan must be updated to include the attached table.</p>	Apr 6: (doc) GGL will submit an updated Spill Contingency Plan that includes an

			"Immediately Reportable Spill Quantities" table.
2	Draft Land Use Permit	Comment (doc) The Draft Land Use Permit has been reviewed. Recommendation Please include the Inspector's recommended changes to the issued permit.	
GNWT - Lands: Erin Anderson			
ID	Topic	Reviewer Comment/Recommendation	Proponent Response
1	LUP Application	Comment (doc) Lands Division and Mining Recorder's Office have reviewed the Land Use Permit and have no concerns. Recommendation See comments regarding land use permit issuance in attached letter.	
Wek' eezhii Renewable Resources Board: Boyan Tracz			
ID	Topic	Reviewer Comment/Recommendation	Proponent Response
2	General File	Comment (doc) WRRB comments re: CH Project (W2015C0003) Recommendation	
1	Wildlife	Comment The WRRB notes in the Project Description, and in the previous permit (W2008C0004), GGL recognizes that the project is located within the range of the Bathurst herd and associated carnivores, and states that GGL will endeavour to ensure that its exploration does not negatively affect the activities of these animals. The Wildlife, Archaeological and Environmental Awareness Plan also states that all activities must cease when caribou are present within 500m, with resumption of activities after caribou move on. As mentioned in the WRRB's comments re: GGL's PGB Project (W2015C0001) on Feb 20, 2015, due to concerns about the status of the Bathurst herd, the GNWT recently established a mobile conservation area to protect the herd. The Mobile Core Bathurst Caribou Conservation Area (MCBCCA) is based primarily on locations of collared Bathurst caribou, with support from aerial surveys. Maps of the zone are updated on a weekly basis and are made available to communities and via the ENR website; e.g. http://www.enr.gov.nt.ca/sites/default/files/mobile_zone_for_public_march_17_2015.pdf The MCBCCA map created on March 17, 2015 (see preceding link) indicates that mobile no-hunting zone is south of GGL's proposed boundary of the Land Use Permit, though it is uncertain where the zone will be during commencement of activities. The zone is intended for the remainder of the 2014/2015 harvest season (i.e. until June 30, 2015) and the approach will be reviewed in the fall of 2015, with possible revision or extension. Though the precise timing of GGL's exploration activities has yet to be	Apr 6: Acknowledged. GGL will regularly monitor the ENR website. Wildlife observations will be provided to the Tlicho Government and ENR.

	<p>finalized, it is anticipated that the exploration on the CH Project will begin in the summer of 2015. As interaction with the Bathurst herd is a possibility, it is imperative GGL be aware of the location and status of the MCBCCA, given the possible impacts to caribou, and given that aerial surveys for caribou may occur during GGL's operations in the field. It is important that GGL staff and contractors are aware of the current sensitive situation re: Bathurst caribou herd, and avoid interaction with the Bathurst herd if it is in the vicinity of the proposed work.</p> <p>Recommendation 1) Regular communication with ENR occur so that GGL is aware of the location and status of the mobile caribou protection zone and is kept up-to-date on any aerial surveys ENR may be conducting; and, 2) Cooperation with the Tlicho Government and the Department of Environment and Natural Resources by providing wildlife observations.</p>	
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WLWB: Roberta Judas

ID	Topic	Reviewer Comment/Recommendation	Proponent Response
1	Spill Contingency Plan - Pg. 4 (1.3) - Facility Description	<p>Comment Page 4 of the Spill Contingency Plan states "the current activities are located under LUP W2008C0001", this is mentioned throughout the Plan. However, since the receipt of the Plan, the LUP for the Zip Camp has since been renewed and is within Land Use Permit W2015C0001.</p> <p>Recommendation The next time GGL update the Plan to reference the current active Land Use Permit (W2015C0001).</p>	Apr 6: GGL will update the plan to reference the current active LUP number for Zip Camp W2015C0001.
2	Spill Contingency Plan and Engagement Plan	<p>Comment Board staff note that GGL has a single Spill Contingency Plan and Engagement Plan for W2015C0001, W2015C0003, and W2015C0004.</p> <p>Recommendation Clarify if there is a benefit for GGL having a seperate Spill Contingency Plan and an Engagement Plan for each of W2015C0001, W2015C0003, and W2015C0004.</p>	Apr 6: GGL acknowledges that there is no advantage to having separate plans, but due to timing deadlines GGL was not able to correlate the plans for all three projects into one plan and submit it in time with the LUPAs.



Environmental Protection Operations Directorate (EPOD)
Prairie and Northern Region
5019 52nd Street, 4th Floor
P.O. Box 2310
Yellowknife NT X1A 2P7

March 30, 2015

EC file: 5100 000 055 / 002
MVLWB file: W2015C0003

Elissa Berrill
Regulatory Specialist
Wek'eezhii Land and Water Board
#1-4905 48th St.
Yellowknife, NT X1A 3S3

Via Online Registry

RE: W2014F0003 – GGL Resources Corp. – Mineral Exploration CH Project – Type A Land Use Permit

Attention: Elissa Berrill

Environment Canada (EC) has reviewed the information submitted to the Wek'eezhii Land and Water Board (WLWB) regarding the above-mentioned file and is submitting comments via the online review system as requested by the WLWB. EC's specialist advice is provided pursuant to the *Canadian Environmental Protection Act 1999*, the pollution prevention provisions of the *Fisheries Act*, the *Migratory Birds Convention Act*, and the *Species at Risk Act*.

Should you require further information, please do not hesitate to contact me at (867) 669-4732 or devin.penney@ec.gc.ca.

Sincerely,

Devin Penney
Environmental Assessment Coordinator

Attachments: EC Comments Excel Sheet

cc: Dave Fox A/Head Environmental Assessment North (NT & NU), EPOD
EC Review Team



The Following tables are referenced in the EC comments excel sheet.

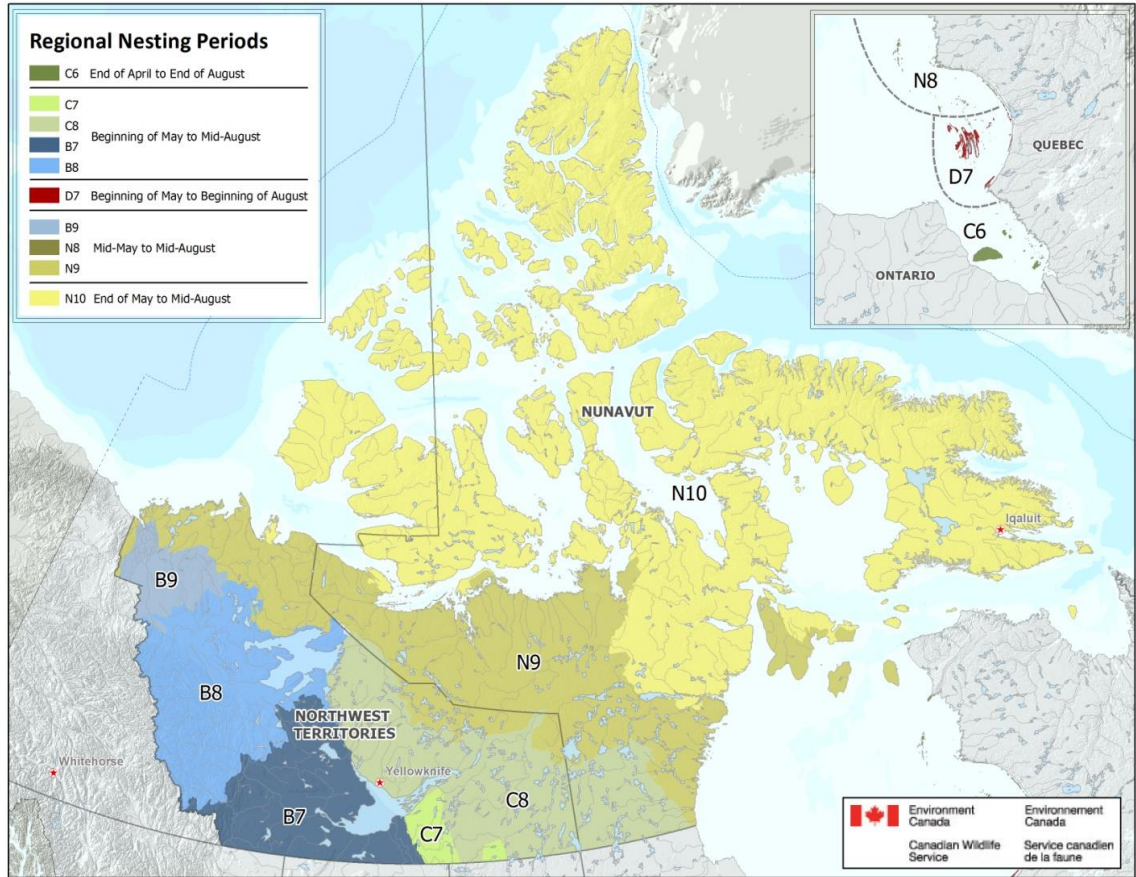
Table 1: Set Back Distance

Migratory Bird Species Group	Setback Distance for Pedestrians / ATVs (m)	Setback Distance for Roads / Construction / Industrial Activities (m)
Songbirds	30	100
Shorebirds	50 ^a	100 ^a
Terns/Gulls	200 ^b	300 ^b
Ducks	100	150
Geese	300	500
Swans/Loons/Cranes	500	750

Table 2: Terrestrial Species at Risk

Terrestrial Species at Risk potentially within project area ¹	COSEWIC Designation	SARA Status	Government Organization with Primary Management Responsibility ²	Recovery Strategy, Action Plan or Management Plan posted on the Species at Risk Public Registry
Eskimo Curlew	Endangered	Schedule 1, Endangered	EC	Recovery Strategy - Final
Red-necked Phalarope	Special Concern	No Status	EC	
Peregrine Falcon	Special Concern	Schedule 1, Special Concern	GN	
Rusty Blackbird	Special Concern	Schedule 1, Special Concern	GN	Management Plan - Proposed
Short-eared Owl	Special Concern	Schedule 1, Special Concern	GN	
Grizzly Bear (Western population)	Special Concern	No Status	GN	
Wolverine	Special Concern	No Status	GN	

Environment Canada (EC) has a national role to play in the conservation and recovery of Species at Risk in Canada, as well as responsibility for management of birds described in the Migratory Birds Convention Act (MBCA). Day-to-day management of terrestrial species not covered in the MBCA is the responsibility of Government of the Northwest Territories (GNWT). Populations that exist in National Parks are managed under the authority of the Parks Canada Agency.



March 30, 2015

Roberta Judas
Regulatory Specialist
Wekeezhii Land and Water Board
#1-4905 48th Street
Yellowknife, NT
X1A 3S3

Dear Ms. Judas,

**Re: GGL Resources Corp.
Land Use Permit Application – W2015C0003
Mineral Exploration – CH Project
Request for Comment**

The Department of Environment and Natural Resources, Government of the Northwest Territories, has reviewed the project at reference based on its mandated responsibilities under the *Environmental Protection Act*, the *Forest Management Act*, the *Waters Act*, the *Forest Protection Act* and the *Wildlife Act* and provides the following comments and recommendations for the consideration of the Board.

Topic 1: Protection of Wildlife and Fish Habitat

Comment(s):

Based on past and current knowledge of the distribution and movement of the barren ground caribou around the CH Project, there is a very high possibility that the Bathurst caribou herd will use this area during the summer and fall during the proposed period of operation.

There has been a growing concern over the protection of wildlife and wildlife habitat on project footprints. A WWHPP outline in more detail the standard operating procedures deemed necessary to protect on-site personnel, wildlife and wildlife habitat within the project footprint, including the use of road/trail access and wildlife monitoring. The WWHPP would be developed in a manner that would be appropriate to the location, scope and size of the project.

Recommendation(s):

- 1) The Permittee shall submit a Wildlife & Wildlife Habitat Protection Plan (WWHPP) to regulatory agencies for review to ensure that negative effects to wildlife and wildlife habitat within the project footprint, including any use of new and existing access roads/trails, are minimized and mitigated.

Comments and recommendations were provided by ENR technical experts in the North Slave Region and were coordinated and collated by the Environmental Impact Assessment Section, Conservation, Assessment and Monitoring Division (CAM).

If you have any questions or concerns, please do not hesitate to contact me at 920-6118 or patrick_clancy@gov.nt.ca

Sincerely,



Patrick Clancy
Environmental Regulatory Analyst
Environmental Impact Assessment Section
Conservation, Monitoring and Assessment Division
Department of Environment and Natural Resources
Government of the Northwest Territories

Appendix B-3:

Immediately Reportable Spill Quantities

TDG Class	Substance for NWT 24 Hour Spill Line	Immediately Reportable Quantities
1 2.3 2.4 6.2 7 None	Explosives Compressed gas (toxic) Compressed gas (corrosive) Infectious substances Radioactive Unknown substance	Any amount
2.1 2.2	Compressed gas (flammable) Compressed gas (non-corrosive, non-flammable)	Any amount of gas from containers with a capacity greater than 100 L
3.1 3.2 3.3	Flammable liquids	> 100 L
4.1 4.2 4.3	Flammable solids Spontaneously combustible solids Water reactant	> 25 kg
5.1 9.1	Oxidizing substances Miscellaneous products or substances excluding PCB mixtures	> 50 L or 50 kg
5.2 9.2	Organic peroxides Environmentally hazardous	> 1 L or 1 kg
6.1 8 9.3	Poisonous substances Corrosive substances Dangerous wastes	> 5 L or 5 kg
9.1	PCB mixtures of 5 or more ppm	> 0.5 L or 0.5 kg
None	Other contaminants (e.g. crude oil, drilling fluid, produced water, waste or spent chemicals, used or waste oil, vehicle fluids, waste water, etc.)	> 100 L or 100 kg
None	Sour natural gas (i.e. contains H ₂ S) Sweet natural gas	Uncontrolled release or sustained flow of 10 minutes or more

In addition, all releases of harmful substances, regardless of quantity, are to be reported to the NWT spill line if the release is near or into a water body, is near or into a designated sensitive environment or sensitive wildlife habitat, poses imminent threat to human health or safety, poses imminent threat to a listed species at risk or its critical habitat, or is uncontrollable.

*All **Green highlights** – Standard Conditions that have been added to this Permit


*All **Yellow highlights** – areas where Board staff request input from the Inspector

* **Conditions without highlights** – conditions that were in the previous LUP (have been updated to match the language of the MVLWB’s List of Standard Conditions, as applicable).



**Conditions Annexed to and Forming Part
of Land Use Permit # W2015C0003**

Part A: Scope of Permit

1. This Permit entitles GGL Diamond Corp. to conduct the following land-use operation:
 - a) All activities will take place between 64° 10' 07" N, 110° 40' 01" W and 64° 36' 12" N, 111° 54' 36" W
 - b) Mineral exploration ~~and associated activities on the CH Project as detailed in the land use permit application dated February 26, 2015.~~ 
2. This Permit is issued subject to the conditions contained herein with respect to the use of land for the activities and area identified in Part A, item 1 of this Permit.
3. Compliance with the terms and conditions of this Permit does not excuse the Permittee from its obligation to comply with the requirements of any applicable Federal, Territorial, Tłıchǫ, or Municipal laws.

Part B: Definitions (defined terms are capitalized throughout the Permit)

Act - the *Mackenzie Valley Resource Management Act*.

Archaeological Overview - as defined by the Prince of Wales Northern Heritage Centre – Guidelines for Developers.

Archaeological Impact Assessment - as defined by the Prince of Wales Northern Heritage Centre – Guidelines for Developers.

Board - the Wek'èezhì Land and Water Board established under section 57.1 of the *Act*.

Borehole - a hole that is made in the surface of the ground by drilling or boring.

Drilling Fluids - any liquid mixture of water, sediment, drilling muds, chemical additives or other wastes that are pumped down hole while drilling and are specifically related to drilling activity.

Drilling Waste - all materials or chemicals, solid or liquid, associated with drilling, including drill cuttings and Drilling Fluids.

Flowing Artesian Well - a well in which water:

- a) Naturally rises above the ground surface or the top of any casing; and
- b) Flows naturally, either intermittently or continuously.

Fuel Storage Container - a container for the storage of petroleum or allied petroleum products with a capacity of less than 230 litres.

Fuel Storage Tank - a closed container for the storage of petroleum or allied petroleum products with a capacity of more than 230 litres.

Greywater - all liquid wastes from showers, baths, sinks, kitchens, and domestic washing facilities but not including toilet wastes.

Habitat - the area or type of site where a species or an individual of a species of wildlife naturally occurs or on which it depends, directly or indirectly, to carry out its life processes.

Inspector - an Inspector designated by the Minister under the *Mackenzie Valley Resource Management Act*.

Minister - the Minister of Indian Affairs and Northern Development.

Ordinary High Water Mark - the usual or average level to which a body of water rises at its highest point and remains for sufficient time so as to change the characteristics of the land. In flowing waters (rivers, streams) this refers to the "active channel/bank-full level" which is often the 1:2 year flood flow return level. In inland lakes, wetlands, or marine environments, it refers to those parts of the Watercourse bed and banks that are frequently flooded by water so as to leave a mark on the land and where the natural vegetation changes from predominately aquatic vegetation to terrestrial vegetation (excepting water tolerant species). For reservoirs, this refers to normal high operating levels (full supply level).

Secondary Containment - containment that prevents liquids that leak from Fuel Storage Tanks or containers from reaching outside the containment area and includes double-walled Tanks, piping, liners, and impermeable barriers.

Sewage - all toilet wastes and Greywater.

Sewage Disposal Facilities - Sump(s) and/or Sewage collection tank(s) and/or storage containers designed to hold Sewage.

Spill Contingency Plan - a document, developed in accordance with Indian and Northern Affairs Canada's *Guidelines for Spill Contingency Planning* (April 2007), that describes the set of procedures to be implemented to minimize the effects of a spill.

Sump - a man-made pit or natural depression in the earth's surface used for the purpose of depositing waste that does not contain Toxic Material, such as non-toxic Drilling Waste or Sewage, therein.

Toxic Material- any substance that enters or may enter the environment in a quantity or concentration or under conditions such that it:

- a) Has or may have an immediate or long-term harmful effect on the environment or its biological diversity;
- b) Constitutes or may constitute a danger to the environment on which life depends; or
- c) Constitutes or may constitute a danger in Canada to human life or health.

Waste – any garbage, debris, chemical, or Toxic Material to be used, stored, disposed of, or handled on land, and also as defined in section 51 of the Act.

Waste Management Plan (WMP) - a document, developed in accordance with the Board's *Guidelines for Developing a Waste Management Plan* that describes the methods of waste management from waste generation to final disposal.


Watercourse - a natural body of flowing or standing water or an area occupied by water during part of the year, and includes streams, springs, swamps and gulches but does not include groundwater.

DRAFT

Part C: Conditions Applying to All Activities (headings correspond to subsection 26(1) of the Mackenzie Valley Land Use Regulations)

Condition	Category
26(1)(a) Location and Area	
1. The Permittee shall use an existing campsite, as described in the complete application.	Existing Camp
2. Prior to the commencement of drilling, the Permittee shall submit the drill target locations on a 1:50,000-scale map with coordinates and map datum to an Inspector and the Board.	Drill Locations
3. The Permittee shall not conduct this land-use operation on any lands not designated in the complete application.	Location of Activities
26(1)(b) Time	
4. At least 48 hours prior to the commencement of this land-use operation, the Permittee's Field Supervisor shall contact an Inspector at (867) 765-6648.	Contact Inspector
5. At least 48 hours prior to commencement of this land-use operation, the Permittee shall provide the following information, in writing, to the Board and an Inspector:	Identify Agent
(a) the name(s) of the person(s) in charge of the field operation; (b) alternates; and (c) all methods for contacting the above person(s).	
6. At least ten days prior to the completion of the land-use operation, the Permittee shall advise an Inspector of: (a) the plan for removal or storage of equipment and materials; and (b) when final cleanup and reclamation of the land used will be completed.	Reports Before Removal
26(1)(c) Type and Size of Equipment	
7. The Permittee shall not use any equipment except of a similar type, size, and number to that listed in the complete application.	Only Approved Equipment
26(1)(d) Methods and Techniques	
8. Immediately upon completion of operations at each Borehole, the Permittee shall remove or cut off and seal each drill casing at ground level.	Mineral Exploration Drill Casings
9. The Permittee shall not erect camps or store material, other than that required for immediate use, on the ice surface of a Watercourse.	Storage on Ice
26(1)(e) Type, Location, Capacity, and Operation of All Facilities	
10. The Permittee shall ensure that the land use area is kept clean at all times.	Clean Work Area
11. The Permittee shall not locate any Sump within 100 metres of the Ordinary High Water Mark of any Watercourse, unless otherwise authorized in writing by an Inspector.	Sumps From Water
26(1)(f) Control or Prevention of Ponding of Water, Flooding, Erosion, Slides, and Subsidence of Land	
12. The land-use operation shall not cause obstruction to any natural drainage.	Natural Drainage
13. The Permittee shall, where flowing water from a Borehole is encountered: (a) plug the Borehole in such a manner as to permanently prevent any further outflow of water; and (b) immediately report the occurrence to the Board and an Inspector.	Flowing Artesian Well

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

14. At least seven days prior to the use of any chemicals that were not identified in the complete application, the MSDS sheets must be provided to an Inspector and the Board. **Chemicals**
15. When drilling within 100 metres of the Ordinary High Water Mark of any Watercourse, and when drilling on ice, the Permittee shall contain all drill water and waste in a closed circuit system for reuse, off-site disposal, or deposit into a land-based Sump or natural depression. **Drilling Near Water or On Ice**
16. The Permittee may deposit Drilling Waste that does not contain Toxic Material in a Sump or natural depression. Any Sumps or natural depressions used to deposit Drilling Waste must be located at least 100 metres from the Ordinary High Water Mark of any Watercourse, unless otherwise authorized in writing by an Inspector. **Drilling Waste**
17. The Permittee shall remove all Drilling Waste containing Toxic Material to an approved disposal facility. **Drilling Waste Disposal**
18. The Permittee shall not allow any Drilling Waste to spread to the surrounding lands or Watercourses. **Drilling Waste Containment**
19. ~~The Permittee shall ensure that all Drilling Fluids, Flowback, and Produced Water wastes are contained in storage tanks located within a bermed area with leak detection and a synthetic liner that is considered impermeable and is capable of containing 110% of the total volume of the largest storage tank(s) employed within the bermed area.~~  **Wastewater Containment**
20. Prior to the expiry date of this Permit or the end of operations, whichever comes first, the Permittee shall backfill and restore all Sumps, unless otherwise authorized in writing by an Inspector. **Backfill Sumps**
21. The Permittee shall maintain a record of all spills. For all reportable spills, in accordance with the GNWT *Spill Contingency Planning and Reporting Regulations*, the Permittee shall: (a) immediately report each spill to the 24-hour Spill Report Line (867) 920-8130; (b) report each spill to an Inspector within 24 hours; and (c) submit, to the Board and an Inspector, a detailed report on each spill within 30 days. **Report Spills**
22. The Permittee shall dispose of all waste petroleum products as described in the approved Waste Management Plan. **Waste Petroleum Disposal**
- 26(1)(h) Wildlife and Fish Habitat**
23. The Permittee shall take all reasonable measures to prevent damage to wildlife and fish Habitat during this land-use operation. **Habitat Damage**
- 26(1)(i) Storage, Handling, and Disposal of Refuse or Sewage**
24. The Permittee shall adhere to the Waste Management Plan, once approved, and shall annually review the plan and make any necessary revisions to reflect changes in operations, technology, chemicals, or fuels, or as directed by the Board. Revisions to the plan shall be submitted to the Board for approval. **Waste Management**
25. The Permittee shall keep all garbage and debris in a secure container until disposal. **Garbage Container**
26. The Permittee shall dispose of all garbage, waste, and debris as described in **Remove Garbage**

the approved Waste Management Plan, unless otherwise authorized in writing by an Inspector.

27. The Permittee shall dispose of all Sewage and Greywater as described in the approved Waste Management Plan. **Sewage Disposal**

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

28. The Permittee shall not operate any vehicle or equipment within 150 metres of a known or suspected historical or archaeological site or burial ground. **Archaeological Buffer**

29. The Permittee shall not knowingly remove, disturb, or displace any archaeological specimen or site. **Site Disturbance**

30. The Permittee shall, where a suspected archaeological or historical site, or burial ground is discovered: (a) immediately suspend operations on the site; and (b) notify the Board at (867) _____ or an Inspector at (867) _____, and the Prince of Wales Northern Heritage Centre at (867) 920-6182 or 873-7688. **Site Discovery and Notification**

31. At least _____ days prior to any new land disturbance, including new drill sites, the Permittee shall conduct an Archaeological Overview to identify areas of high and low potential for archaeological and burial sites and shall submit a summary report to the Board and the Prince of Wales Northern Heritage Centre. **Archaeological Overview**

Prior to disturbance in areas of high potential for archaeological or burial sites identified in the Archaeological Overview, the Permittee shall conduct an Archaeological Impact Assessment of the sites where disturbance is planned and shall submit a summary report to the Board and the Prince of Wales Northern Heritage Centre. **AIA – High Potential**

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

26(1)(l) Security Deposit

32. Prior to the commencement of the land-use operation, the Permittee shall deposit with the Minister a security deposit in the amount of \$ _____. **Security Deposit**

33. All costs to remediate the area under this Permit are the responsibility of the Permittee. **Responsibility for Remediation Costs**

26(1)(m) Fuel Storage

34. The Permittee shall not place any Fuel Storage Containers or Tanks within 100 metres of the Ordinary High Water Mark of any Watercourse, unless otherwise authorized in writing by an Inspector. **Fuel Near Water**

35. The Permittee shall ensure that all fuel caches have adequate Secondary Containment. **Fuel Cache Secondary Containment**

36. The Permittee shall set up all refueling points with Secondary Containment. **Secondary Containment - Refueling**

37. The Permittee shall not allow petroleum products to spread to surrounding lands or Watercourses. **Fuel Containment**

38. The Permittee shall mark all Fuel Storage Containers and Tanks with the Permittee's name. **Mark Containers**

- | | | |
|-----|--|--------------------------------------|
| 39. | Within ten days of the establishment of any fuel cache, the Permittee shall report the location and quantity of the cache in writing to an Inspector and the Board. | Report Fuel Location |
| 40. | The Permittee shall seal all outlets of Fuel Storage Containers and store the containers on their sides with the outlets located at 3 and 9 o'clock, except for containers currently in use. | Seal Outlet |
| 41. | The Permittee shall adhere to the Spill Contingency Plan, once approved, and shall annually review the plan and make any necessary revisions to reflect changes in operations, technology, chemicals, or fuels, or as directed by the Board. Revisions to the plan shall be submitted to the Board for approval. | Spill Contingency Plan |
| 42. | Prior to commencement of operations, the Permittee shall ensure that spill-response equipment is in place to respond to any potential spills. | Spill Response |
| 43. | The Permittee shall clean up all leaks, spills, and contaminated material.
26(1)(n) Methods and Techniques for Debris and Brush Disposal

26(1)(o) Restoration of the Lands | Clean Up Spills |
| 44. | Prior to the expiry date of this Permit, the Permittee shall complete all cleanup and restoration of the lands used.
26(1)(p) Display of Permits and Permit Numbers | Final Cleanup and Restoration |
| 45. | The Permittee shall keep a copy of this Permit on hand at all times during this land-use operation.
26(1)(q) Biological and Physical Protection of the Land | Copy of Permit |
| 46. | If any plan is not approved by the Board, the Permittee shall revise the plan according to the Board's direction and re-submit it to the Board for approval. | Resubmit Plan |
| 47. | The Permittee shall adhere to the Engagement Plan, once approved, and shall annually review the plan and make any necessary revisions to reflect changes in operations or as directed by the Board. Revisions to the plan shall be submitted to the Board for approval. | Engagement Plan |
| 48. | All revised plans submitted to the Board shall include a brief summary of the changes made to the plan. | Summary of Changes |



March 25, 2015

Elissa Berrill
Wek'èzhii Land & Water Board
P.O. Box 32
WEKWEÈTI, NT X0E 1W0

Dear Ms. Berrill:

Land Use Permit Application: W2015C0003 – GGL Resources Corp.
Type of Operation: Mineral Exploration
Location: Lac De Gras Area

The Government of the Northwest Territories (GNWT) reviewed Land Use Permit Application W2015C0003 and recommends that the permit be granted.

On March 12, 2015, our Inspector, Clint Ambrose, provided his comments and recommendations for your consideration, via the LWB Online Review System.

Comments received from the Lands Administration Division and the Mining Recorders Office indicate no concerns.

Thank you for the opportunity to comment on this application. Should you have any questions or concerns regarding our comments, please contact our Inspectors, Clint Ambrose, at (867) 765-6648, or Joe Heron, at (867) 765-6684.

Sincerely,

Scott Stewart
Regional Superintendent
North Slave Region

c. North Slave Region - Yellowknife

SS/eka



March 26, 2015

Ryan Fequet
Regulatory Mining Specialist
Wek'èezhì Land and Water Board
#1-4905 48th Street
Yellowknife, NT, X1A 3S3

VIA Email: rfequet@wlwb.ca

Re: GGL Resources Corp. Application for Type A Land Use Permit, Mineral Exploration CH Project (W2015C0003)

Dear Mr. Fequet,

The Wek'èezhì Renewable Resources Board (WRRB) has a mandate for wildlife, plant and forest management in Wek'èezhì and adheres to the principles and practices of conservation in fulfilling its duties. The WRRB provides the following comments on the GGL Resources Corp. (GGL) Application for Type A Land Use Permit, which allows for mineral exploration on the CH Project, a group of five mining leases in an area approximately 300km north-northeast of Yellowknife, and southwest of Lac de Gras. The purpose of this land use application is to continue conducting mineral exploration at Courageous Lake and Starfish Lake area.

The Board understands that the permit may encompass the following activities

- Prospecting and mapping (ground truthing) involving 1-2 person crews;
- Rock and soils (till) sampling requiring helicopter support for a team of 2 geologists who will collect hand-dug samples at pre-determined locations;
- Ground geophysics surveys requiring the establishment of a control grid and use of a 1-4 person ground crews with hand-held instruments;
- Drilling of prospective targets involving the use of a portable diamond drill core rig (e.g. Boyles 25A) that will be moved via helicopter (e.g. Bell 407); the precise location and number of drill targets are not known at this time, however, some targets are land-based allowing testing during the summer while other targets are on lakes which requires ice of a sufficient thickness;
- Containment of waste drill water at a land-based sump at least 100m away from any body of water, with potential use of a holding tank;
- Use of the existing 20-person exploration camp (Zip Camp) or other facilities in the area; and,
- Access to daily work sites by helicopter or fixed wing aircraft

The WRRB notes in the Project Description, and in the previous permit (W2008C0004), GGL recognizes that the project is located within the range of the Bathurst herd and associated carnivores, and states that GGL will endeavour to ensure that its exploration does not negatively affect the activities of these animals. The Wildlife, Archaeological

and Environmental Awareness Plan also states that all activities must cease when caribou are present within 500m, with resumption of activities after caribou move on.

As mentioned in the WRRB's comments re: GGL's PGB Project (W2015C0001) on Feb 20, 2015, due to concerns about the status of the Bathurst herd, the GNWT recently established a mobile conservation area to protect the herd. The Mobile Core Bathurst Caribou Conservation Area (MCBCCA) is based primarily on locations of collared Bathurst caribou, with support from aerial surveys. Maps of the zone are updated on a weekly basis and are made available to communities and via the ENR website; e.g. http://www.enr.gov.nt.ca/sites/default/files/mobile_zone_for_public_march_17_2015.pdf

The MCBCCA map created on March 17, 2015 (see preceding link) indicates that mobile no-hunting zone is south of GGL's proposed boundary of the Land Use Permit, though it is uncertain where the zone will be during commencement of activities. The zone is intended for the remainder of the 2014/2015 harvest season (i.e. until June 30, 2015) and the approach will be reviewed in the fall of 2015, with possible revision or extension. Though the precise timing of GGL's exploration activities has yet to be finalized, it is anticipated that the exploration on the CH Project will begin in the summer of 2015. As interaction with the Bathurst herd is a possibility, it is imperative GGL be aware of the location and status of the MCBCCA, given the possible impacts to caribou, and given that aerial surveys for caribou may occur during GGL's operations in the field. It is important that GGL staff and contractors are aware of the current sensitive situation re: Bathurst caribou herd, and avoid interaction with the Bathurst herd if it is in the vicinity of the proposed work.

To assist with addressing potential wildlife-related impacts of the proposed activities the WRRB recommends:

- Regular communication with ENR occur so that GGL is aware of the location and status of the mobile caribou protection zone and is kept up-to-date on any aerial surveys ENR may be conducting; and
- Cooperation with the Tłıchq Government and the Department of Environment and Natural Resources by providing wildlife observations.

If there are any questions regarding these comments, please feel free to contact our office.

Sincerely,



Jody Pellissey
Executive Director

- cc. Raymond A Hrkac, Chairman and CEO, GGL Resources Corp.
Sjoerd van der Wielen, Manager, Lands Section, Tłıchq Government
Fred Mandeville, Superintendent, ENR, North Slave Office
Grant Pryznyk, Interim Chair, Wek'èezhì Renewable Resources Board