



February 7, 2025

Crown-Indigenous Relations and Northern Affairs Canada – Contaminants and Remediation Division
P.O. Box 1500
YELLOWKNIFE, NT X1A 2R3

Attention: Ron Pankratz

**Re: Land Use Permit W2020X0005
Miscellaneous - Remediation
Rayrock Remediation Project, NT**

Dear Ron Pankratz,

An inspection of the Rayrock Winter Road (~Km 20 of the Wekweètì Winter Road) and the Sun Main winter road was conducted by Inspector Clint Ambrose on February 6th, 2025. The inspection was carried out to ensure operating conditions annexed to the above noted land use permit are being adhered to during this land use operation. The Inspectors met with Mr. Devin Dupuis & Mr. Eric Parent of Sanexen (Contractor) and all findings of the inspection were discussed.

Winter road construction commenced on approximately January 15th, 2025 and the Inspector was pleased with the diligence being demonstrated by the Contractor & Sub-Contractor during this land use operation. No major concerns were noted, and your copy of the Environmental Inspection Report is enclosed and should be self-explanatory.

If you have any questions or concerns, please contact the undersigned at (867) 767-9188 or Karine Gignac at (867) 767-9187 ext. 24189.

Sincerely,

Clint Ambrose
Manager, Resource Management (Inspector)
Land & Water North Slave Regional Office
GNWT – DECC

cc: WLWB – via email
Sanexen – via email
GNWT-INF – Mr. Garry Snyder - via email
CIRNAC-CARD – via email





ENVIRONMENTAL INSPECTION REPORT

Permittee:	CIRNAC – Contaminants and Remediation Division	Inspection Date: February 6 th , 2025
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	Permit Expiry Date	Last Previous Inspection
Land Use Permit No.	W2020X0005	November 17 th , 2026
Quarry Permit No.		March 7 th , 2024
Contractor:	Sanexen	Subcontractor: Weatherby Trucking Ltd.

Location(s) Inspected:	Winter Roads.
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Current Stage of Operation:	Winter road construction from Rayrock to the Emile River & the Sun Main winter road commenced on or about January 15 th , 2025. Equipment/personnel were actively constructing both winter roads at the time of the inspection.
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Program Modifications Approved:	
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Condition of Operation "A" - Acceptable "U" - Unacceptable "N/A" - Not Applicable

	Operating Condition	Aspect Inspected			Condition
		Winter Roads			
A	Location and Area	A			
B	Time	A			
C	Type and Size of Equipment	A			
D	Methods and Techniques	A*			#22 Winter Roads
E	Type, Location, Capacity and Operation of All Facilities	A			
F	Control or Prevention of Ponding of Water, Flooding, Erosion, Slides and Subsidence of Land	A			
G	Use, Storage, Handling and Ultimate Disposal of Any Chemical or Toxic Material	A			
H	Wildlife and Fisheries Habitat	A			
I	Storage, Handling and Disposal of Refuse or Sewage	A			
J	Protection of Historical, Archeological and Burial Sites	A			
K	Objects and Places of Recreational, Scenic or Ecological Value	N/A			
L	Security Deposit	N/A			
M	Fuel Storage	A*			#64 Fuel Cache Secondary Containment
		A*			#75 Drip Trays
N	Methods and Techniques for Debris and Brush Disposal	A			
O	Restoration of the Lands	A			
P	Display of Permits and Permit Numbers	A			
Q	Matters Not Inconsistent With the Regulations	A			
R	Sections 8 to 16 M.V.L.U.R.	A			



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Date: February 6th, 2025

Permit#: W2020X0005

Explanatory Remarks

An inspection of the Rayrock & Sun Main Winter Roads (Figure 1 through 3) was conducted by Inspector Clint Ambrose on February 6th, 2025. The inspection was carried out to ensure operating conditions annexed to the above noted land use permit are being adhered to during this land use operation. The Inspectors met with Mr. Devin Dupuis & Mr. Eric Parent (Contractor) on site and all findings were discussed.

The Contractor notified the Inspectors on January 6th, 2025 of land use operation commencement (Condition #10 & #12) and mobilization to the land use area occurred on approximately January 14th, 2025. Initial work completed was the preparation of equipment to start winter road construction from the old mine site southward towards the Emile River. To achieve sufficient ice to accommodate freight movement along the winter road, personnel were mobilized to the Emile River on January 15th, 2025 to commence flooding operations (Figure 4 & 5).

At the time of the inspection the Contractor has completed the initial construction of approximately five (5) kilometers on the Sun Main Winter Road and two (2) kilometers on the south end of the Rayrock Winter Road. The northern sections of winter road on Tlichon Land were not accessible by pickup and therefore not inspected at this time. Mr. Dupuis & Mr. Parent informed the Inspector that construction on the north end of the winter road is progressing nicely and are of the opinion that full compliance with operating conditions of the land use permit is occurring.

The Inspector is pleased to report that initial icing of portages (Figure 6 through 8) was sufficient to meet the requirements of Condition #22 but as a reminder, and prior to the movement of freight, fuel, and the sand haul to Sunmain, icing from shoulder-to-shoulder must be completed during final grooming activities. This practice will ensure the underlying ground surface is protected at all times and prevent early deterioration of the portages if land use operations progress late into the Spring.

Water is being sourced from various watercourses along the Sunmain Winter Road and one location can be viewed in Figure 9. As seen in this figure, no obvious hydrocarbon or glycol spills were observed on the ice surface and it is anticipated that diligent monitoring & cleanup of small spills will be conducted on an ongoing basis if observed. This practice will ensure compliance with Condition #66 (Fuel Containment).

Equipment in use for winter road construction on the south end of the Rayrock Winter Road is two water trucks and a small Snowcat (Figures 10 through 12). Equipment/vehicles appeared to be operating cleanly since no obvious spills were observed along the winter road or where equipment may have been parked in laydowns (East & West side of the Emile River Crossing).

No major concerns were noted with any aspect of winter road construction since no displaced organics (duff layer) were observed in windrows, diligent blade work by equipment operators is occurring, belly tarps are in use under the engine compartments of the water trucks (Figure 13), spill response materials are readily available if a spill were to occur (Figure 14), and secondary containment is present below parked vehicles.

The only concern noted was with the drip board viewed in Figure 15 under the parked pickup in the Km 0 laydown of the Rayrock winter road. The hydrocarbon absorbent matting has been ripped off the board and it must be resecured to ensure effectiveness. This concern was discussed with Mr. Weatherby upon completion of the inspection and will be immediately addressed.

During winter road use, the Permittee/Contractor/Sub-Contractor must diligently monitor the portages to ensure compliance with Condition #22, #34 and #35 occurs at all times. The Inspectors are pleased to report that all personnel are well aware of the permit requirements and this cooperation is anticipated & appreciated.

To support land use operations along the Sunmain Winter Road, a small camp has been established approximately 100 metres south of Portage 201 of the Wekweètì Winter Road and can be viewed in Figure 16. The camp is being well managed and the following was observed; a mega bag is being used for the temporary storage of combustible waste (Figure 17) until it can be removed to Rayrock for incineration, honey bags are in use for sewage disposal with the bags viewed in Figure 18 removed for proper offsite disposal, no obvious spills were observed at the enviro tank (Figure 19), drip trays are in use during re-fueling operations, gasoline drums are being stored upright (Figure 20), and ancillary equipment & hydrocarbon containers have been placed in drip trays (Figure 22).

The only concern noted was with the active diesel fuel drum viewed in Figure 22. Secondary containment is not effective. Typically, the area of concerns on an active drum is from the fittings or spills during refueling operations. The Inspector discussed the requirement for the Permittee to wrap the fittings with hydrocarbon absorbent matting, place a five gallon pail with absorbent matting & weight below the fittings to catch drips from re-fueling, properly dispose of the snow currently contained in the yellow instaberm and remove the instaberm since it poses a false sense of security since it currently is ineffective, and is a safety concern for personnel.

Completed off Site
Representative's Signature

Clint Ambrose
Inspector


Inspector's Signature



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Figure 1

Km 0 of the Sun Main Winter Road. Looking south along the alignment.



Figure 2

Example of the initial icing of a portage on the Rayrock winter road.





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Figure 3

Ice surface of Rat lake has been cleared to width. Looking southwest.



Figure 4

The Emile River ice crossing is being flooded to grow ice to allow for the movement of freight and fuel onto the Rayrock Property.





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Figure 5
Looking east at the Emile River ice crossing.



Figure 6
Example of a portage with initial icing completed. Final grooming must be completed to ensure icing from shoulder-to-shoulder of the right-of-way.





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Figure 7

Another example of a portage with initial icing completed on the Sunmain Winter Road.



Figure 8

Looking north along the second portage of the Rayrock Winter Road.





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Figure 9

Water source along the Sunmain Winter Road. No obvious hydrocarbon or glycol leaks were observed.



Figure 10

One of two water trucks active on the southern sections of the Rayrock Winter Road.





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Figure 11

Second water truck observed working on the Rayrock Winter Road.



Figure 12

Snowcat actively ploughing snow on the southern sections of the Rayrock Winter Road.





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Figure 13

Water truck equipped with a belly tarp to contain potential leaks. Belly tarps must be maintained at all times.



Figure 14

Pickup parked at the Km 0 laydown of the Rayrock Winter Road. Spill kit was present.





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Figure 15

Hydrocarbon absorbent matting must be secured to drip boards to ensure they are effective at containing potential leaks from vehicles.



Figure 16

Weather haven camp set up at Km 0 of the Sunmain Winter Road.





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Figure 17

Mega bag for the storage of combustible items at the Km 0 camp. Waste is being returned to Rayrock for proper disposal as per the approved Waste Management Plan.



Figure 18

Honey bags are in use for sewage. Bags are being removed for proper offsite disposal.





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Figure 19

Envirotank positioned at the camp. No concerns were noted with fuel storage or handling.



Figure 20

Gasoline drums are being stored upright on a trailer. No concerns with fuel storage were noted.





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Figure 21

Hydrocarbon containers and ancillary equipment is stored in secondary containment.



Figure 22

Secondary containment is ineffective. The Contractor must wrap the fittings with absorbent matting and place a five gallon pail under the fittings of active drums.

