



March 26, 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 Sun Main Winter Road Camp was conducted by Inspector Clint Ambrose and Karine Gignac on March 18th, 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 of Sanexen (Contractor) and all findings of the inspection were discussed.

At the time of the inspection the road to Sun Main was completed, and hauling of the gravel was ongoing. Aside from a spill that required cleaning -up at the original camp location the road and camp were complying with all Conditions listed in the land use Permit. 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,

Karine Gignac, CD
Resource Management Officer II (Inspector)
North Slave Regional Office
GNWT – Department of Lands
Sincerely,

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: March 18 th , 2025
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	Permit Expiry Date	Last Previous Inspection
Land Use Permit No.	W2020X0005	November 17 th , 2026
Quarry Permit No.		February 20 th , 2025
Contractor:	Sanexen	Subcontractor: Weatherby Trucking Ltd.

Location(s) Inspected:	Sun Main Winter Road and Camp.
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Current Stage of Operation:	Construction of the Sun Main Winter Road is complete and hauling of gravel was half completed. The camp is active at approximately 14km into the road.
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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 Road	Sunmain Camp		
A	Location and Area	A	A		
B	Time	A	A		
C	Type and Size of Equipment	A	A		
D	Methods and Techniques	A	A		
E	Type, Location, Capacity and Operation of All Facilities	A	A		
F	Control or Prevention of Ponding of Water, Flooding, Erosion, Slides and Subsidence of Land	A	A		
G	Use, Storage, Handling and Ultimate Disposal of Any Chemical or Toxic Material	A*	A		#76 Clean up spills
H	Wildlife and Fisheries Habitat	A	A		
I	Storage, Handling and Disposal of Refuse or Sewage	A	A		
J	Protection of Historical, Archeological and Burial Sites	A	A		
K	Objects and Places of Recreational, Scenic or Ecological Value	N/A	N/A		
L	Security Deposit	N/A	N/A		
M	Fuel Storage	A	A		
N	Methods and Techniques for Debris and Brush Disposal	A	A		
O	Restoration of the Lands	A	A		
P	Display of Permits and Permit Numbers	A	A		
Q	Matters Not Inconsistent With the Regulations	A	A		
R	Sections 8 to 16 M.V.L.U.R.	A	A		



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Date: March 18th, 2025

Permit#: W2020X0005

Explanatory Remarks

An inspection of the Sun Main Winter Road and Sun Main temporary camp was conducted by Inspector Clint Ambrose and Karine Gignac on March 18th, 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 of Sanexen (Contractor) and all findings were discussed on site.

At the time of the inspection, the construction of the road was completed and hauling of the sand/gravel from Rayrock was about half completed. The followings were observed:

- The road was in good condition and sufficient ice coverage was observed (Figures #1 & 2),
- No damage to ground or signs of deterioration was observed and the Permittee was reminded to pay particular attention to the shoulders for any signs of softening or deterioration.
- What appears to be a fuel spill was observed at the previous camp location (start of the road near the Wekweeti Winter Road junction (Figures #3 & 4). The Permittee was notified of the findings and a clean-up of the spill was completed shortly thereafter. At the time of writing this report, the Inspector had received photo confirming the clean-up was complete and update to the small spill log made,
- At the time of inspection, the camp was occupied with 7 people,
- The camp area was iced in prior to mobilization to prevent damage to ground and easy of cleaning-up,
- The camp is kept clean and well organized. Domestic garbage is containerized and removed for proper off-site disposal or incinerated when adequate to do so (in line with the Waste Management Plan).
- Sewage management is done using honey bags et off-site disposal at an approved facility,
- Drip trays and/or boards are used underneath equipment parked, and secondary containments is used in areas of fuel handling (Figures #6 to 9),
- No obvious spills were observed at the camp location.

With the increase of the sun load, the Permittee was reminded to monitor diligently the conditions and integrity of the winter road. Repairs must be done promptly when possible and traffic must be stopped if the risk of rutting or gouging to the ground is imminent.

At the time of writing this report, the Inspectors have received notifications that the heavy hauling (gravel) was completed on March 24th, 2025.

The Permittee is reminded to provide the Inspectors with notification once the date is known for the closure of the road and the demobilization of the camp. At the closure of the camp, a thorough inspection of the surface used must be conducted and any hydrocarbon impacted snow must be scrapped, the snow/impacted material containerized and sent for proper off-site disposal.

Overall, the Inspectors are pleased with the level in which this land use operation is being conducted, the ongoing communication with the Permittee, contractors and sub-contractors and overall compliance with he all Conditions of the land use permit. This level of cooperation is anticipated for the remaining of the land use operations.

Completed off Site
Representative's Signature

Karine Gignac
Inspector


Inspector's signature



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Figure 1

Example of a lake section of the Sun Main winter road.



Figure 2

Hauling of gravel on the Sun Main winter road.



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Figure 3

Hydrocarbon spill on the Sun Main winter road (original camp location near the Wekweeti winter road junction)



Figure 4

The area of hydrocarbon impacted snow at the original camp location.



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Figure 5
Camp units.



Figure 6
Spill response material is readily available and visible in areas of fuel handling.



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Figure 7

Overview of the camp laydown.



Figure 8

Drip boards / trays, and secondary containments are used throughout the site where required or where potential risk of hydrocarbon impacting the grown may be present.



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Figure 9

Generator and refueling area.



Figure 10

The hauled gravel is deposited temporary at the end of the winter road, then reloaded into smaller hauling equipment that can navigate safely the narrower stockpiling area at Sun Main.



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