

## Reviewer Comments and Proponent Responses

**Project: Mackenzie Mountains Research and Monitoring Operations**  
**Board: Sahtu Land and Water Board**  
**Organization: GNWT-ENR - Sahtu Region**

No.	Topic	Reviewer Comment	Reviewer Recommendation	Proponent Response
GNWT-Lands - Sahtu Region - Jonathan Gillingham				
1	Application	The Department of Lands Sahtu Region has no issues with this Application. The applicant currently holds a Reserve for fuel storage at Godlin Lake Airstrip.	Allow for renewal of Land Use Permit	

No.	Topic	Reviewer Comment	Reviewer Recommendation	Proponent Response
CIRNAC (Yellowknife) - Megan Larose				
1	Engagement Plan	The engagement plan included with the application indicates in Section 1.0 Project Description that communication has occurred since inception and through ongoing operations 2017 to present; however, the previous engagement listed in Section 2.0 Previous Engagement only lists engagement tasks from 2016/2017. The listed engagement also appears to be focused on the wildlife research rather than the fuel storage. Section 2.1 Methods of Engagement does indicate that interested groups were notified of the fuel storage requirements for the project on May 1, 2017; however, no other reference to engagement specific to the fuel storage requirements is provided. The provided list of stakeholders/interested parties appears to exclude other land use permit holders within the Mackenzie Mountains (e.g., outfitters, lodges, camps). No indication has been given if the engagement list was reviewed/ revised in advance of the 2022 permit application.	While the engagement plan indicates that communication has been ongoing, no engagement activities specific to fuel storage have been provided since 2017 other than a reference to tentatively planned conversations with the Sahtu Renewable Resource Board regarding funding and logistics. It is also not clear if other land use permit holders have been engaged with since 2017. It is recommended that additional engagement be considered with all stakeholders and interested parties related to planned fuel storage prior to activities starting in 2023 and that a future revision of the engagement plan outline these current activities.	
2	Waste Management Plan	The introduction (Section 1) of the waste management plan references Indigenous and Northern Affairs Canada. The department name has been changed to Crown-Indigenous Relations and Northern Affairs Canada and should be updated in the plan.	A future revision of this plan should replace Indigenous and Northern Affairs Canada with Crown-Indigenous Relations and Northern Affairs Canada.	
3	Spill Contingency Plan	The introduction (Section 1) of the spill contingency plan and Figure #5 references Indigenous and Northern Affairs Canada (INAC); this should be revised to Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC).	A future revision of this plan should replace Indigenous and Northern Affairs Canada with Crown-Indigenous Relations and Northern Affairs Canada where applicable.	
4	Spill Contingency Plan	The spill prevention section (Section 4) of the spill contingency plan references visual inspection to check for leaks or damage, and regular inspection of fuel storage tanks and secondary containment; however, a schedule or frequency for the inspections is not provided.	Given that the fuel storage locations will not have a continual site presence, it is recommended that the frequency of visual inspections be clearly stated in the spill contingency plan.	
5	Draft Permit Conditions	It is understood from the application that activities related to fuel storage are anticipated to occur primarily from	Revise conditions related to notification of commencement and shutdown	

		April through October over a five year period. As such, it is suggested that Conditions 4, 5 and 6 of the expired permit be revised to reflect the seasonal nature of the activities (e.g., similar to conditions 15 through 20 from the LWB Standard Land use Permit Conditions Template).	of activities to reflect the seasonal nature of the planned activities.	
6	Draft Permit Conditions	The remediation section of the spill contingency plan and the purpose and scope of plan section of the waste management plan indicate that contaminated materials, waste, and empty drums will be disposed of in an approved facility. Notification that the approved facility will accept the waste should be provided.	Add condition related to the Notification of Solid Waste Disposal (e.g., Condition 69 from the LWB Standard Land use Permit Conditions Template).	
7	Draft Permit Conditions	Condition 23(a) of the expired permit states that the permittee shall examine all fuel storage containers and tanks for leaks a minimum once per week. It is understood that there will not be continual site presence so this condition should be revised to reflect the frequency that the permittee will have people on-site.	Revise condition 23(a) to reflect periodic site presence.	
8	Draft Permit Conditions	Condition 30 (maximum fuel on site) of the expired permit requires revision to reflect the requested volume of fuel to be stored (144 drums = approx. 29,520 litres).	Revise Condition 30 to reflect the maximum fuel on site.	
9	Draft Permit Conditions	The GNWT-ENR has applied to continue the same activities at Mile 222 as they have conducted for the last five years under Permit #S17H-002. The new permit should transfer any outstanding liabilities, including restoration requirements incurred under the previous permit into the new permit.	Add transfer of liabilities condition to permit S22H-003 (e.g., Condition 105 from the LWB Standard Land Use Permit Conditions Template).	

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CIRNAC-Inspectors - Tim Morton				
1	Application – Section 8	The Permittee states that if all the drums are unable to be stored at Mile 222 then they may store some at Godlin Lake. The Inspector wants to ensure that the Permittee has discussed this plan with Canol Outfitters and wants to help ensure that both land users will work together to avoid any conflicts on land use.	Ensure the Permittee contacts Canol Outfitters before storing fuel at Godlin Lake area.	
2	Draft Land Use Permit – Condition #4	The number (867) 669-2468 is no longer active. Please remove this number from the land use permit.	Remove the phone number (867) 669-2468.	
3	Draft Land Use Permit – Condition #23	Add the wording while the land use operation is active to condition #23 part 'a'.	Add recommended wording as it is not feasible for the Permittee to inspect the fuel containers when they are not onsite.	
4	Draft Land Use Permit – Condition #35	The Inspector recommends that condition #35 be removed as this proposed operation is only for fuel storage and no equipment is being used.	Remove condition #35 as stated above.	

