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**Fort Resolution
Métis Council**

Fax

To: Alistair MacDonald **From:** FRMC President Kara King
Fax: 867 766-7074 **Pages:** _____
Phone: _____ **Date:** July 06/07
Re: _____ **CC:** _____

- Urgent** **For Review** **Please Comment** **Please Reply** **Originals in Mail**

• **Comments:**

Concerns based out of the PPPP Dar Report

Water Concerns:

Tamerlane does not anticipate the need to treat any discharged waters prior to entering the infiltration basin.

We believe this water will be fairly toxic with Aluminum, Iron and some nutrients like sulphur because it will be brought to surface from underground and sent to the infiltration basin.

What will happen to the vegetation growing from the infiltration basin?

To ensure success of the infiltration basin, an inverted perforated culvert will be placed in the middle of the basin to help facilitate proper percolation rates and eliminate any lateral water movement.

Cominco metals (LtD) (2001-2005) report that the concentrations of total metals in the water of the receiving environment remain stable at low and environmentally acceptable levels.

Based on this, no residual effects on the quality of surface waters of the area are expected to occur.

We see a breach in one of the tailings of Tech Cominco. We feel a study should be done in that area to tell us what damages has been done to our fish in the area and the water.

To date there have not been any studies done on the water since the 1992 base line study. This was told to us by Bruce Donald, who is the claim manager for Tech Cominco.

The DAR report also stated that Tamerlane is prepared to use lime in the infiltration basin if needed. What will this do to the plants that grow there? Is this as far as Tamerlane plans to go for reclamation?

We see Traditional Knowledge used, but where is the Scientific Data on the water quality, and fish studies as well. The report refers to fish in the area, inconnu, whitefish, northern pike, pickerel and burbot. No reports on how the fish are, health wise. This information should be included. We need to have data on the water and fish before and after the mine is in operation so we can monitor effects, if any.

Freeze Curtain Concerns

The underground stream varies from 1m to 18m in depth. We should know where the depth changes, we feel the tailings may be moved to where the ground water is further down, this way the metals from the tailings may not get into the underground streams.

We were told it could take months to thaw the freeze ring, however the DAR says weeks, (page 267). If weeks, does this mean it will thaw in a bulk of water? We think this could spread rapidly. This needs more information that this will not happen.

We also feel, when water is being detoured, like it will be with the freeze curtain. What will happen to the ground where the water will be detoured to? Could this cause sink holes? DAR report does not have the answer.

The DAR report (page 276) says Layne Christensen does not believe that the Karst Environment and levels of salts and solids will impair the ground freezing and formation of the frozen earth wall. The Karst Environment does provide a higher level of permeability.

We feel that there should be evidence to this.

If ground freezing is new and this is based off one mans experience. How much experience does Layne Christensen have? Where did he acquire his experience? Page 258 talks about a meeting in Yellowknife that addresses three issues:

- 1 Frozen Perimeter
- 2 Ground Water Potential Effects
- 3 Existence of Sara

We need to see the report from this meeting.

The backfill of the R-190 mineral deposit with waste rock and concrete will serve to replace the mined out mineral deposit and will ensure that subsidence of this area cannot occur. Where has this happened before?

Location

Footprint is expected to be 8.98 hectares of land for building and associated mining support infrastructure, (page 283) of DAR, breaks this down, but keep in mind we don't know what happens to the land where the infiltration basin will be. Even though it is a gravel pit, there is potential for healthy plant life.

Page 177 DAR also stated Tamerlane is interested in mining as close as old Pine Point Mines up to Reef Property. 18 holes were completed here, 8 holes in W85 deposit and 7 within R-190 deposit. 2 holes were cased and drilled to levels just above the ore body at G-03, they remain to be completed. 3 holes were abandoned at R-190 because the drill was unable to continue beyond the upper level of the collapsed structure. Will this create a much bigger footprint? A study area as well, trucks would be in all areas of exploration. If so, more studies need to take place on animal disturbance of the area. Access agreement needs to be drawn between the FRMC and developers.

Page 260 Dar calls for a breakdown of effects. Short term, hours, weeks, months.

- effects during project of 3 years.
- Effects beyond 3 years.

Where is the breakdown of effects and studies done? We also note in Traditional Knowledge study, there were concerns on wildlife effects by increased traffic. Habitats changing, we will need these studies.

We would also recommend a much higher deposit be made up front for a reclamation plan which will include all cost of the returning the land to a healthy growing site.

Species at Risk

Caribou: Woodland Caribou are known to have traditional calving grounds. Calves are born in early June on the Island of the Northwest Shore of the Great Salve Lake. Woodland Caribou tracks were found 1.5 kms Northwest of Polar Lake.

The DAR report has no information on a study done that can tell us the habitat of the following herd?

The DAR report also admits that woodland Caribou and Moose may be effected through Physical or behavioral disturbance, including displacement and habituation. (eg: extraction)

We feel this should call for a comprehension package without getting our hands dirty before this PPPP continues.

Whooping Crane

During a wildlife study in 2005, one (1) single non breeding Whooping Crane was sited at a recently beaver pond located 26 kms. From the local study area and near the East end of the Regional study area

The DAR doesn't do a proper study on Whooping Cranes, just because only one (1) was spotted, it does not meat that there is only one (1). It is proven that Whooping Cranes mate for life, and that one (1) usually stays at their nest.

Fish

We would like to see the evidence that shows only two (2) lakes in the area that have fish.

Roads

The main access road will be widened about 5 meters (16 feet) to allow 2 way traffic. About 15,256 metric tones of aggregate material generated during the PPPP site preparation phase will be used to widen and improve the main access road.

What type of aggregate material are they going to use? Is it possible to cause contamination to plants and animals.

The DAR report refers to hauling being done by rail way or trucking. This needs to be clarified, which is it? We need to know this is a true assessment, it could be done on impact.

The Department of Transportation will continue to be responsible for operation and maintenance of highways.

What measures or commitment are they giving that the roads will not be damaged.

Economics

Tamerlane an estimated cost between 80 to 100 million dollars, estimated at 50 to 60 dollars per tonne of ore. Annual production rate is between 800,000 and 1,000,000 tonnes per annum. Annual cost from 40 to 60 million dollars.

Only 65 jobs are estimated for one (1) year of construction.

131 jobs for 12 to 15 months during operation.

14 jobs available for reclamation.

We need to know what we can secure for our members up front?

Again the DAR report say the hauling may be by truck or railway.

We need to know which is it so we can attempt to benefit from opportunities that may come out of PPPP?

The reports says during a 12 hour workday there will be 10 trucks average weight 20 to 30 tonnes at 50 to 65 trips per day for 12 to 15 months.

Also mentions that Tamerlane will hire 2 vans at 2 trips per day to haul employees.

Again we feel being the oldest community, that we have guaranteed section 35 rights that we should have rights of first refusal to all contracts with the GNWT policy attached to the agreements negotiated (BIP) this is for Northerns, Business Incentive Program.

We also feel camp catering is something we should have opportunities to negotiate.

The summary of key Socio Economics Assessment predictions, we feel it focuses on Hay River to much. We also feel that there has not been anything done to address socio economic issues.

The DAR report addresses this by saying developers and Territorial Social Services Agencies have the capacity to manage. We need to know what does this manage for us with Socio Economic effects? (pages 337 to 339).

We also see that Hay River will be managing hazardous waste and non-hazardous waste. This tells us that deals are already being made so why not deal with us on opportunities we have interest in?

Consultation

DAR report says that the Deninu Kuc First Nations believes we do not have an approved IMA. It should be clarified that our IMA was approved by the Federal and Territorial Government.

On February 22, 2005 a tour was given, however our members went on their own cost and put in their own time because Tamerlane refused to cover it, David Swisher and Jerry DeMarco.

We don't feel this is how Tamerlane should be building good relations with the Fort Resolution Metis Council. These costs should have been covered by the developer.

We also question why Enterprise is being consulted when the PPPP is out of our Territory.

Dana Cross as well is being consulted, the Metis he represents have no Section 35 Rights to the PPPP area. We feel more negotiations should take place with those people who are indigenous to the Territory.

Maps of our History in the office for back up:

Animals used in the PPPP area.

Leonard Beaulieu's information:

Moose
Beaver
Martin
Caribou
Wolf otter

Angus Beaulieu's information:

Rabbit
Mink
Deer
Moose
Otter
Wolf
Coyote
Fisher
Fox
Porcupine
Martin
Chipmunk
Squirrel