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www.slwb.com

July 22, 2024

File: S24C-004f

Mark Cliffe-Phillips
Mackenzie Valley Review Board
200 Scotia Centre
Box 938, 5102-50th Avenue
Yellowknife NT X1A 2N7

Sent by email

Dear Mark Cliffe-Phillips,

Re: Integral Minerals Corp. – Notice of Preliminary Screening Determination – Application for Type A Land Use Permit– KAP Project, Ravens Throat River, NT

The Sahtu Land and Water Board (Board) met on July 18, 2024 and considered the Application Package from Integral Minerals Corp. for Land Use Permit (Permit) S24C-004 for the KAP Project (Project), in accordance with the *Mackenzie Valley Resource Management Act* (MVRMA).

The Board conducted a preliminary screening based on the public record for the proceeding. Based on the evidence provided, the Board is satisfied the screening has been completed according to section 125 of the MVRMA and has decided **not to refer** the Project to environmental assessment. The Board's Preliminary Screening Determination and Reasons for Decision, as required by section 121 of the MVRMA, is attached.

If the Board does not receive notice of referral to environmental assessment, it can proceed with issuance of Permit S24C-004 on **July 31, 2024**.

Yours sincerely,

A handwritten signature in blue ink that reads "Valerie Gordon". The signature is fluid and cursive, with a long horizontal stroke at the end.

Valerie Gordon
Chair, Sahtú Land and Water Board

BCC'd to: SLWB – Tulita District (JG)
Jared Suchan, V.P. of Exploration, Integral Minerals Corp.

Attached: Preliminary Screening Determination and Reasons for Decision



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Preliminary Screening Determination and Reasons for Decision

Land Use Permit Application	
File Number	S24C-004
Company	Integral Metals Corp
Project	The KAP Project
Location	Mackenzie Mountains, Ravens Throat River, NT
Activity	Mineral Exploration
Date of Decision	July 18, 2024

1.0 Decision

In accordance with subsection 124(1) of the [Mackenzie Valley Resource Management Act](#) (MVRMA), the Sahtu Land and Water Board (SLWB or Board) met on July 18, 2024 to make a preliminary screening determination on the Application from Integral Metals Corp. (Applicant) for S24C-004¹ for the KAP Project (Project).

The Board has decided not to refer the proposed Project to the Mackenzie Valley Environmental Impact Review Board (the Review Board) for Environmental Assessment because, based on the evidence, it is the Board's opinion that the proposed Project will not have a significant adverse impact on the environment or be a cause of public concern.

¹See SLWB Online Registry www.slwb.com for [S24C-004 – Application Form – April30_24](#)

The Board’s determination, including reasons for its decision, are detailed in sections [3.0](#) and [4.0](#).

2.0 List of Defined Terms and Acronyms

Applicant	Integral Metals Corp.
Application	The complete application package submitted by the Applicant Land Use Permit S24C-004.
Board	Sahtu Land and Water Board
CRP	Closure and Reclamation Plan
EA	Environmental Assessment
GNWT	Government of the Northwest Territories
GNWT-ECC	Government of the Northwest Territories – Environment and Climate Change
MVLWB	Mackenzie Valley Land and Water Board
MVRMA	Mackenzie Valley Resource Management Act
Minister	Minister of the Government of the Northwest Territories – Environment and Climate Change
ORS	Online Review System (www.new.onlinereviewsystem.ca)
Party	As per the LWB Rules of Procedure , an applicant, a person, or an organization participating in the regulatory proceeding for the Application.
Project	The KAP Project, which is the proposed development (as defined in Part 5 of the MVRMA). ²
Review Board	Mackenzie Valley Environmental Impact Review Board
SCP	Spill Contingency Plan
Standard Licence Conditions	LWB Standard Water Licence Conditions Template
Standard Permit Conditions	LWB Standard Land Use Permit Conditions Template
TG	Tłı̄chq̄ Government
TK	Traditional Knowledge
WMP	Waste Management Plan

3.0 Background and Scope of Screening

On April 30, 2024, Integral Metals Corp. (Integral) applied for a Type A Permit for the KAP Project. The Project involves surface and subsurface exploration for zinc, gallium, and germanium. The Project will take place in the Mackenzie Mountains 315km northwest of Fort Simpson near Camp Dal and the Ravens Throat River. The Applicant requested a five-year permit term.

² “development” is defined in Part 5 of the [MVRMA](#) as:

“any undertaking, or any part or extension of an undertaking, that is carried out on land or water and includes an acquisition of lands pursuant to the *Historic Sites and Monuments Act* and measures carried out by a department or agency of government leading to the establishment of a park subject to the *Canada National Parks Act* or the establishment of a park under a territorial law.”

As per the LWB Engagement Policy, the Applicant conducted Engagement between February 2024 and April 2024. The Following parties were engaged, as described in the Project Engagement Record and Engagement Plan: ³

- Tulita District Land Corporation
- Tulita Land Corporation
- Hamlet of Tulita
- Fort Norman Metis Land Corporation
- Norman Wells Land Corporation
- Sahtu Renewable Resources Board
- Norman **Wells** Renewable Resources Council
- Tulita Renewable Resources Council
- Sahtu Land Use Planning Board
- Pehdzeh Ki First Nation
- Town of Norman Wells

In accordance with paragraph 125(1) of the [MVRMA](#), the Board must conduct a preliminary screening of the proposed Project to determine and report to the Review Board whether, in its opinion, the proposed Project might have a significant adverse impact on the environment, or might be a cause of public concern. The details of the Board's analysis are set out in section [4.0](#) below.

3.1 Scope of Screening:

New Areas and Activities:

The KAP Project will take place on GNWT Territorial lands, on the following mineral claims: KAP 1-6 M12414; M12415; M12416; M12417; M12418; M12420.

Activities will include:

- **Mineral exploration, including diamond-drilling and reverse-circulation drilling;**
- **Use of equipment, vehicles and machines;**
- **Use and storage of fuel;**
- **Construction, operation and maintenance of a temporary camp and potential satellite camps;**
and
- **Establishment and maintenance of winter-access trails within the property.**

³ See SLWB Online Public Registry for [S24C-004 - Engagement Plan - Apr30 24.pdf](#)

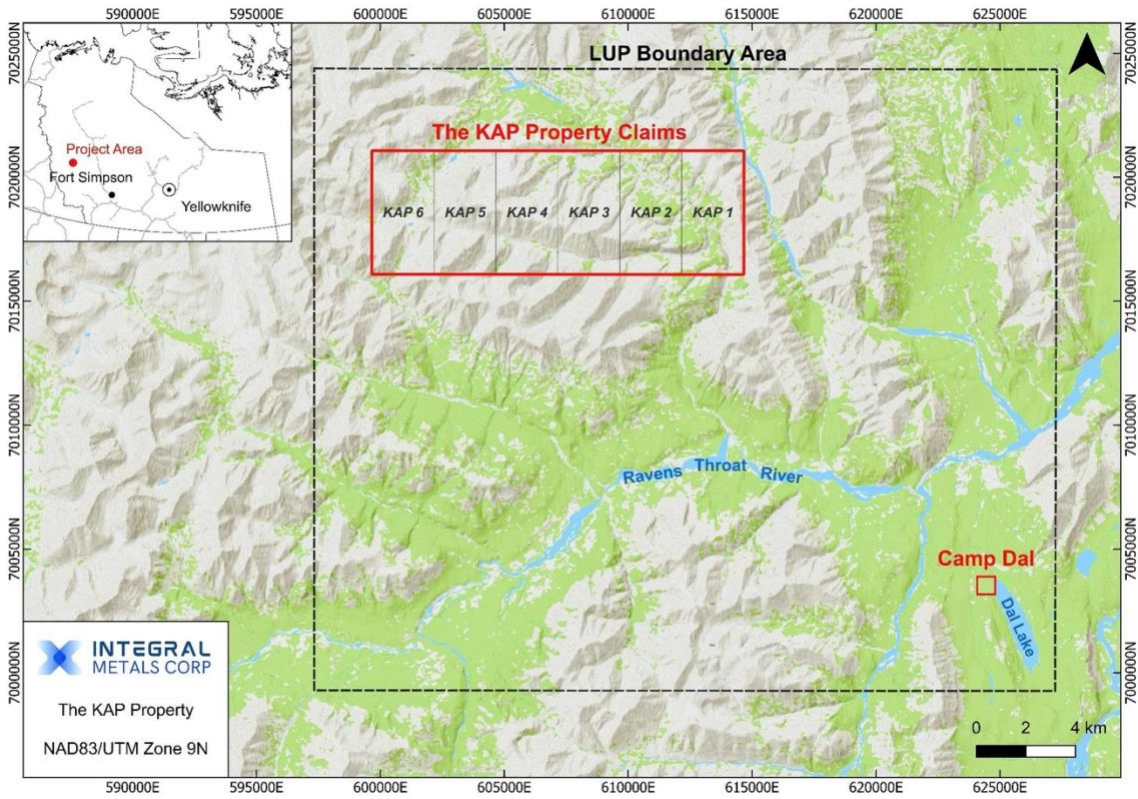


Figure 1 Location of the LUP Boundary Area, the KAP Property, and Camp Dal.

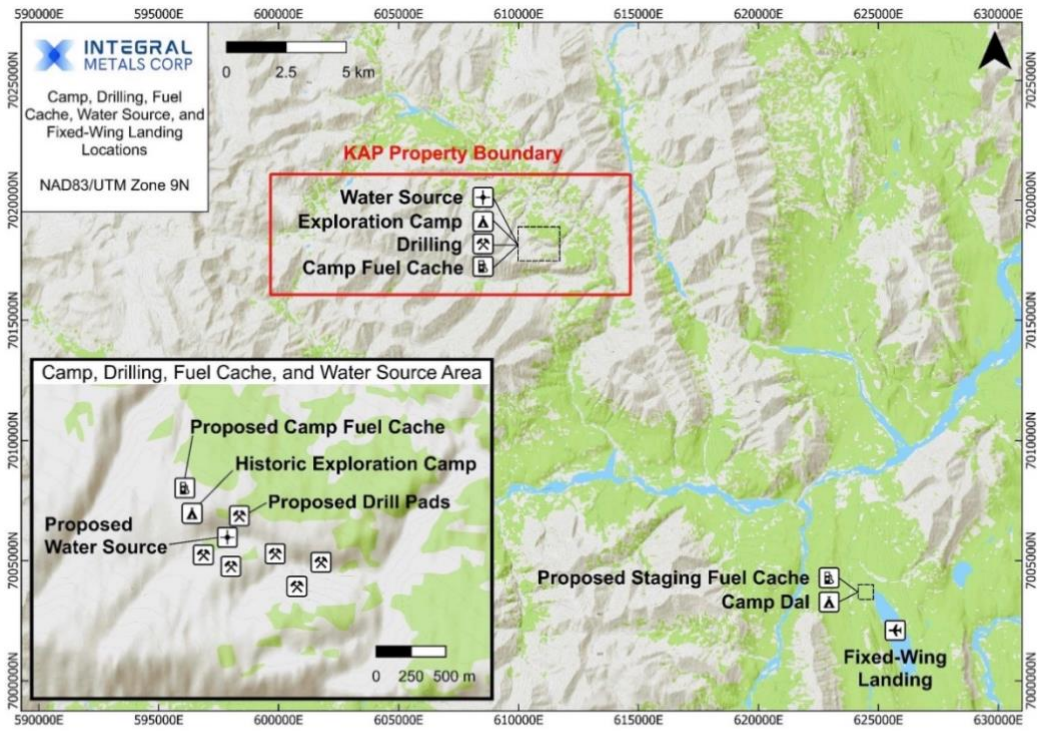


Figure 2 Potential camps, drill pads, fuel caches, water sources, and fixed-wing landing locations.

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3.2 Public Record and Regulatory Proceeding

To assist the Board in its preliminary screening determination for the Project, the Board distributed the Application and a draft Permit for public review on May 14, 2024, inviting reviewers to provide comments and recommendations on the Applications and the preliminary screening (e.g., on impacts and mitigation measures) using the Online Review System (ORS). Comments were due May 27, 2024, with responses from the Applicant due June 10, 2024. The Board received comments and recommendations from Environment and Climate Change Canada (ECCC), Government of the Northwest Territories – Environment and Climate Change (GNWT-ECC), and GNWT-ECC – Prince of Wales Northern Heritage Centre (PWNHC).⁴

Since there were no requests to extend the reviewer comment deadline, the Board is satisfied that a reasonable period of notice was given to affected communities and First Nations, as required by subsection 63(2) of the [MVRMA](#).

4.0 Potential Impacts and Proposed Mitigations

Table 1 below summarizes:

- the potential impacts of the proposed Project;
- the concerns that were identified during the regulatory proceeding and how the Applicant addressed those concerns;
- the proposed and potential mitigations for the potential impacts; and
- the Board’s analysis of the potential impacts and proposed mitigations.

⁴ See SLWB Online Review System for [The KAP Project Type A Land Use Permit Application](#)

Table 1: Potential Impacts and Proposed Mitigations for the Proposed Project

Potential Impact	Activity	Proposed Mitigations <i>Description of measures to reduce potential impacts, including consideration of cumulative impacts and climate change.</i>	Board Analysis and Determination
Disturbance to ground, permafrost, vegetation	<ul style="list-style-type: none"> • Drilling of boreholes • Setting up of camp and satellite camps • Creation of wastewater sump • Use of snowmobiles • Use of heavy equipment • Creation of drill waste sumps • Refueling of equipment • Equipment maintenance activities 	<ul style="list-style-type: none"> • The Applicant proposed the following mitigations in the Application: <ul style="list-style-type: none"> ○ Drilling operations will be restricted to a very small footprint which will subsequently be reclaimed to its natural state using CCME and industry best practices. ○ Integral Metals Corp will remove or cut off and seal each drill casing at ground level ○ Disturbed sites will be re-vegetated, and the disturbed land be returned as close to the original condition as possible ○ Will ensure the ground is capable to support vehicle movements so that the land is not disturbed. ○ Backfilling and restoring sumps following their use will limit potential for localized erosion. ○ Provide adequate insulation of the ground surface beneath all camp structures to prevent vegetation from being removed, the melting of permafrost, and the ground from settling/eroding. ○ Activities will be designed to mitigate adverse environmental impacts related to degradation of permafrost. ○ Ground disturbance will be kept to a minimum with only hand dug pits. ○ Reclamation including moss replacement will be carried out as soon as the area is vacated. ○ Drill hole locations will be relocated to minimize permafrost disturbance wherever practicable. <p>The Board has a standard permit are typically used to mitigate the</p>	<p>No concerns were brought to the Board’s attention during the application public review periods.</p> <p>Based on the described mitigations, it is the Board’s opinion that the proposed activities will not have a significant adverse impact on the environment and will not be a cause of public concern.</p>

		<p>identified potential impacts. These standard conditions include:⁵</p> <ul style="list-style-type: none"> ○ LOCATION OF ACTIVITIES ○ CAMP SETBACK ○ USE EXISTING CAMP ○ DRILL LOCATIONS ○ SUMP SETBACK ○ USE APPROVED EQUIPMENT ○ MINERAL EXPLORATION DRILL CASINGS ○ STORAGE ON ICE ○ EXCAVATED MATERIAL TEST PITS ○ CLEAN WORK AREA ○ PERMAFROST PROTECTION ○ NATURAL DRAINAGE ○ PROGRESSIVE EROSION CONTROL ○ REPAIR EROSION ○ FLOWING ARTESIAN WELL ○ OFF-ROAD VEHICLE TRAVEL ○ PREVENTION OF RUTTING ○ SUSPEND OVERLAND TRAVEL ○ VEHICLE MOVEMENT FREEZE-UP ○ CONSTRUCT ICE BRIDGES SNOWFILLS ○ EQUIPMENT: WATERCOURSE BUFFER ○ EXCAVATION SETBACK ○ DRILLING NEAR WATER OR ON ICE ○ DRILLING WASTE ○ DRILLING WASTE DISPOSAL ○ DRILLING WASTE CONTAINMENT ○ RECLAIM NON-OIL AND GAS SUMPS ○ WASTE CHEMICAL DISPOSAL ○ WASTE PETROLEUM DISPOSAL ○ HABITAT DAMAGE 	
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⁵ See the SLWB Policies and Resources webpage to access the LWB [Standard Land Use Permit Conditions Template](#).

		<ul style="list-style-type: none"> ○ WASTE MANAGEMENT ○ REPAIR LEAKS ○ FUEL STORAGE SETBACK ○ FUEL CACHE SECONDARY CONTAINMENT ○ SECONDARY CONTAINMENT – REFUELING ○ FUEL CONTAINMENT ○ FUEL ON LAND ○ SEAL OUTLET ○ SPILL CONTINGENCY PLAN ○ SPILL RESPONSE ○ DRIP TRAYS ○ CLEAN UP SPILLS ○ REPORT SPILLS ○ MINIMIZE AREA CLEARED ○ CLEARING SENSITIVE AREA ○ PRE-CONSTRUCTION PROFILES ○ SAVE AND PLACE ORGANIC SOIL ○ FINAL CLEANUP AND RESTORATION ○ NATURAL VEGETATION ○ ACTIVE REVEGETATION ○ PROGRESSIVE RECLAMATION 	
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<p>Contamination of Soil, Groundwater, and Waterbodies</p>	<ul style="list-style-type: none"> • Transfer, storage, and use of petroleum products and/or chemicals • Waste Disposal 	<ul style="list-style-type: none"> • The Applicant has developed a spill contingency⁶ and a waste management plan⁷ to prevent spills and waste contamination. • The Applicant proposed the following mitigations in the Application: <ul style="list-style-type: none"> ○ Follow an approved spill plan and procedure. ○ Spill kits and equipment will be in place and readily available. ○ Regular inspection of fuel caches and transfer areas. ○ Personnel will be trained in proper spill procedures. ○ Sealing of any drill holes that encounter artesian aquifers. ○ Proper waste management practices. ○ Secondary containment for fuel caches. ○ Proper labeling and positioning of fuel drums ○ Both depositing drill-cuttings in a natural depression and locating sumps at least 100 m from the highwater mark of any water course will limit potential for contamination. <p>The Board has a standard permit are typically used to mitigate the identified potential impacts. These standard conditions include:</p> <ul style="list-style-type: none"> ○ LOCATION OF ACTIVITIES ○ CAMP SETBACK ○ USE EXISTING CAMP ○ DRILL LOCATIONS ○ SUMP SETBACK ○ USE APPROVED EQUIPMENT ○ MINERAL EXPLORATION DRILL CASINGS ○ STORAGE ON ICE ○ EXCAVATED MATERIAL TEST PITS ○ CLEAN WORK AREA ○ PERMAFROST PROTECTION 	<p>The concerns that were brought to the Board’s attention during the application public review period have been addressed by the Applicant.</p> <p>Based on the described mitigations, it is the Board’s opinion that the proposed activities will not have a significant adverse impact on the environment and will not be a cause of public concern.</p>
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⁶ See SLWB Online Public Registry for [S24C-004 - Spill Contingency Plan - Apr30 24](#)

⁷ See SLWB Online Public Registry for [S24C-004 - Waste Management Plan - Apr30 24](#)

		<ul style="list-style-type: none"> ○ NATURAL DRAINAGE ○ PROGRESSIVE EROSION CONTROL ○ REPAIR EROSION ○ FLOWING ARTESIAN WELL ○ OFF-ROAD VEHICLE TRAVEL ○ PREVENTION OF RUTTING ○ SUSPEND OVERLAND TRAVEL ○ VEHICLE MOVEMENT FREEZE-UP ○ CONSTRUCT ICE BRIDGES SNOWFILLS ○ EQUIPMENT: WATERCOURSE BUFFER ○ EXCAVATION SETBACK ○ DRILLING NEAR WATER OR ON ICE ○ DRILLING WASTE ○ DRILLING WASTE DISPOSAL ○ DRILLING WASTE CONTAINMENT ○ RECLAIM NON-OIL AND GAS SUMPS ○ WASTE CHEMICAL DISPOSAL ○ WASTE PETROLEUM DISPOSAL ○ HABITAT DAMAGE ○ WASTE MANAGEMENT ○ REPAIR LEAKS ○ FUEL STORAGE SETBACK ○ FUEL CACHE SECONDARY CONTAINMENT ○ SECONDARY CONTAINMENT – REFUELING ○ FUEL CONTAINMENT ○ FUEL ON LAND ○ SEAL OUTLET ○ SPILL CONTINGENCY PLAN ○ SPILL RESPONSE ○ DRIP TRAYS ○ CLEAN UP SPILLS ○ REPORT SPILLS ○ MINIMIZE AREA CLEARED 	
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		<ul style="list-style-type: none">○ CLEARING SENSITIVE AREA○ PRE-CONSTRUCTION PROFILES○ SAVE AND PLACE ORGANIC SOIL○ FINAL CLEANUP AND RESTORATION○ NATURAL VEGETATION○ ACTIVE REVEGETATION○ PROGRESSIVE RECLAMATION	
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<p>Water drawdown</p> <p>Fish/Fish Habitat disturbance</p>	<p>Water use for drilling, camp</p>	<ul style="list-style-type: none"> • The Applicant estimated that daily water use would be below the 99 m³ threshold for a Type B Water Licence. Drawdowns could occur but are expected to be temporary and negligible. • Applicant will follow LWB Method for Determining Winter Water Source Capacity for Small-Scale Developments and Framework for Assessing the Ecological Flow Requirements to Support Fisheries in Canada (i.e. The proposed activities will utilize no more than 0.0006 m³ /s of instantaneous river water flow at any given time.) 	<p>No concerns were brought to the Board's attention during the application public review periods.</p> <p>Based on the described mitigations, it is the Board's opinion that the proposed activities will not have a significant adverse impact on the environment and will not be a cause of public concern.</p>
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<p>Impacts to Wildlife and Fish Habitat</p>		<ul style="list-style-type: none"> • The Applicant has developed a Wildlife and Archaeology Protection Plan (WAPP), which was submitted as part of the Application. • The Applicant proposed the following mitigations in the Application: <ul style="list-style-type: none"> • Abide by all applicable legislation to prevent damage to fish habitat and impacts to wildlife. • No feeding wildlife. • Minimize erosion, properly-manage drilling wastes, prevent obstruction of natural drainage, proper waste management practices so as not to attract wildlife, and respond to spills. • Will not commence any drilling or movement of equipment within 500 m of any caribou. • During the public review, ECCC provided recommendations pertaining to best practices for species at risk, migratory birds and bank swallows, including the storage of attractants and the protection of water courses (ECCC comments 3 – 9).⁸ Where applicable, the Applicant confirmed the information was in the WAPP, or committed to updating the document to reflect the recommendations) <p>The Board has a standard permit are typically used to mitigate the identified potential impacts. These standard conditions include: `</p> <ul style="list-style-type: none"> • HABITAT DAMAGE • MIGRATORY BIRD NEST DISTURBANCE 	<p>The concerns that were brought to the Board’s attention during the application public review period were adequately addressed by the Applicant.</p> <p>Based on the described mitigations, it is the Board’s opinion that the proposed activities will not have a significant adverse impact on the environment and will not be a cause of public concern.</p>
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⁸ See SLWB Online Review System for [The KAP Project Type A Land Use Permit Application](#)

<p>Disturbances to Archaeological Sites</p>		<ul style="list-style-type: none"> • The Applicant has developed a Wildlife and Archaeology Protection Plan, which was submitted as part of the Application. • The Applicant proposed the following mitigations in the Application <ul style="list-style-type: none"> • Making workers aware of what to do if they suspect they have encountered an archaeological site and following the Integral Chance Archaeological Find Procedure document. • Working with government bodies that have documented Archaeological and Cultural Heritage sites and ensure that they are being avoided. <p>The Board has a standard permit are typically used to mitigate the identified potential impacts. These standard conditions include:</p> <ul style="list-style-type: none"> • ARCHAEOLOGICAL BUFFER • SITE DISTURBANCE • SITE DISCOVERY AND NOTIFICATION • ARCHAEOLOGICAL OVERVIEW • AIA – HIGH POTENTIAL 	<p>No concerns were brought to the Board’s attention during the application public review periods.</p> <p>Based on the described mitigations, it is the Board’s opinion that the proposed activities will not have a significant adverse impact on the environment and will not be a cause of public concern.</p>
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4.1 Consideration of Potential Impacts

Based on the potential impacts and proposed mitigations identified above in Table 1, the Board considered whether the changes to the Project might have a significant adverse impact on the environment. In general, impacts of the changes to the Project on the environment can be mitigated through the use of permit conditions of two general types:

1. conditions in the existing Permit, including requirements for management and monitoring plans, with revisions where necessary; and
2. new or unique conditions that may be needed to mitigate potential impacts of the changes to the Project that may not be addressed by the conditions in the existing Permit, and which may be from the Board’s standard conditions list or established by the Board as per the LWB [Standard Process for Creating New Conditions](#).

These conditions may include requirements for management and monitoring plans that provide detailed information regarding the implementation of mitigation measures and the evaluation of their effectiveness.

A draft Permit was circulated for review during the regulatory proceeding, and all Parties were given the opportunity to provide comments and recommendations on the draft conditions. In finalizing the conditions, the Board will consider all of the evidence provided through the regulatory proceeding.

4.2 Consideration of Public Concern

In addition to considering the potential impacts of the Project, the Board considered whether the Project might be a cause of public concern. Based on the evidence provided during the regulatory proceeding the Board did not identify any comments or issues that indicate that the Project is a cause of public concern.

5.0 Conclusion

The Board has conducted a preliminary screening of the Project. The Board has reviewed all the evidence received during the regulatory process with respect to the Preliminary Screening of the proposed changes to the Project. Based on the evidence, it is the Board’s opinion that the proposed changes to the Project will not have a significant adverse impact on the environment or be a cause of public concern, as set out in paragraph 125(1)(a) of the [MVRMA](#). The Board has therefore decided not to refer the proposed changes to the Project to Environmental Assessment. If the Board does not receive a notice of referral to environmental assessment by July 29, 2024 the Board can issue the Permit on July 30, 2024.



July 22, 2024

Valerie Gordon, Chair
Sahtú Land and Water Board

Date