



Northwest Territories Resources, Wildlife and Economic Development

December 4, 2000

Mr. Luciano Azzolini  
Environmental Assessment Officer  
Mackenzie Valley Environmental Impact Review Board  
2<sup>ND</sup> FLOOR, SCOTIA CENTER  
YELLOWKNIFE, NT

Dear Mr. Azzolini:

**Draft Terms of Reference for Canadian Zinc Drilling Program and Fuel Recovery Environmental Assessments.**

Thank you for the opportunity to provide comments on the terms of reference for these two projects. The GNWT has reviewed the draft Terms of Reference as requested, and has the following comments for the consideration of the Review Board.

**Six-Hole Drilling Program:**

- The proponent should discuss the maximum number of people who will be in camp at any one time, and should provide details of human waste and garbage disposal methods appropriate to the camp population. The Department of Health and Social Services requires that sanitary facilities be located a minimum of 30 m away from any occupied area.
- The proponent should provide detailed information on methods of storage and disposal of drill cuttings. In addition, information should be provided on the disposal of any drilling muds or fluids utilized during the drill program. This should include a discussion of the required cuttings sumps. If the existing tailings pond will be used for disposal of drill cuttings, its geotechnical soundness must be demonstrated.
- The proponent should provide information on the location and extent of any new cat trails or roads required to access the drill sites, with particular reference to any forest or vegetation clearing that will result. This will allow the Forest Management Division to provide recommendations respecting the storage, use, or burning of timber. Field operations occurring during the closed season requires observance of the *Guidelines for Industrial Operations in the Forest Area During the Closed*



*Season.* Fieldwork in the summer may also require a permit to burn pursuant to the *Forest Protection Act*. The proponent should contact William Mawdsley, Acting Director, Forest Management Division of RWED at (867) 872-7725 for information on these matters. Plans for the revegetation and reclamation of drill pads and any access roads should be also be included.

- The proponent should discuss the socio-economic impacts of the project, including, but not limited to, employment, contracting, or supply opportunities that could be made available to local or regional workers and businesses.

### **Fuel Recovery and Road Rehabilitation**

- The proponent should discuss whether any opportunity exists for the early recovery of fuel from the Granger fuel cache as well as from Cat Camp.
- The proponent should discuss plans for reclamation and revegetation of the re-established road section in the event that the mine is not developed as planned. The proponent should also describe plans for site revegetation and remediation of any contamination found at Cat Camp.
- The proponent should provide an evaluation of the risks associated with transporting the fuel in plastic tanks or fabric bladders in rock trucks, and a discussion of any feasible alternative methods.
- The proponent's discussion of road reestablishment impacts should cover the entire length proposed, including the Nahanni Karst area, rather than being confined to the Nahanni Karst area, and must discuss impacts to water bodies from sediment loading and the installation of culverts. Impacts to wildlife due to disturbance should also be discussed.
- The proponent should estimate the quantity of fill required to repair the road, and discuss the sources of the required material. Impacts related to creating borrow pits should be detailed.
- The proponent should provide evidence that the recipient fuel tanks are safe, as these tanks are now approximately 20 years old. Tanks and berms should be tested to confirm their integrity. Tanks should be subject to hydrostatic testing, corrosion resistance testing, leakage testing, and cathodic resistance testing. Tanks should meet the following standards:
  - Floor Bottom Inspection Standards
  - National Fire Condition Standards
  - CCME Environmental Code of Practice for above ground tank systems.

- This list is not complete and an audit of the entire system should be done with deficiencies corrected prior to any fuel transfers occurring.
- The Spill Contingency and Response Procedures provided by the proponent to date are very general and should be more fully elaborated in the proponent's EAR. Spill response procedures and equipment must be sufficient to respond to a spill of the entire contents of a tank used for fuel transport.
- The proponent should discuss the socio-economic impacts of the project, including, but not limited to, employment, contracting, or supply opportunities that could be made available to local or regional workers and businesses.

I hope you find these comments useful in the preparation of the final terms of reference for these projects.

Sincerely,

A handwritten signature in black ink, appearing to read "Kathryn Emmett". The signature is fluid and cursive, with the first name being the most prominent.

Kathryn Emmett  
Director  
Policy, Legislation and Communications