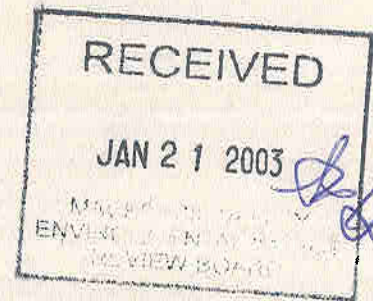


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20 Jan 03
Yellowknife, NWT.

Mr. Alan Ehrlich,
A/Manager of EIA
Mackenzie Valley Environmental Impact Review Board,
Box 938, 5102 - 50th Ave.
Yellowknife, NT. X1A 2N7



Dear Mr. Ehrlich,

Re: North American Tungsten - Draft Terms of Reference and Work Plan

Thank you for your letter of 10 Jan 03, which solicited our comments on the Draft Terms of Reference and Work Plan in connection with EA 002-003, Can Tung Mining and Milling Development.

EA Work Plan Schedule. We find the proposed schedule appropriate and workable. You estimate between 131 to 170 days will be required from start of process to delivery of the final report to the Minister. This seems quite reasonable, and all parties should agree that the deadline for completion is to be by the end of June 2003. Delaying tactics ought not to be countenanced by the board.

Scale of Environmental Assessment. The Board is aware of the small scale nature of the Can-Tung mine and of its very limited financial resources, together with the fact it has operated for many years with negligible environment impact. There is a world of difference between extending for a few years this small existing undertaking, and, for example, the start up of a new major diamond mine. Therefore all parties should agree that a modest environmental impact statement derived from existing information is all that is reasonable necessary. To require new million dollar studies would be to put the mine out of business, and its labour force out on the street.

Reclamation, Restoration and Abandonment. Unless new ore is found, the remaining life of the mine is quite limited. Because of this, there is little point investigating to death the existing operation; but rather the Board should concentrate on proper abandonment and site restoration provisions, as outlined in subsection 3.19 of its draft terms of reference.

Some Minor Points. In your document, subsection 2.1 describes the development as an open pit tungsten mine. The mine is, in fact, an underground operation; although a small open pit was worked for just a few years many decades ago.

Section 4 on page 9 makes reference to the acceptance by the Board of confidential documents. Apart from a few documents such as sales contracts, which the parties thereto might wish to keep confidential for the purposes of commercial competitiveness

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(and are really not the concern of the Board anyway) we can think of nothing that should be kept secret. If the Board engages in secret and non-transparent practices it can hardly expect to gain the **confidence** of the public it is designed to serve.

Thank you again for the opportunity to record our comments

Yours truly,

SNA^tPS

Joan Schollar
per

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