



Northwest Territories Resources, Wildlife and Economic Development

May 10, 2002

Laurie Cordell  
Regulatory Officer  
Mackenzie Valley Land and Water Board  
PO BOX 2130  
YELLOWKNIFE, NT  
X1A 2P6

VIA FAX: 873-661

Mackenzie Valley Land  
& Water Board

File

MAY 13 2002

Application # N3L2-0004

Copied To KLIPMILCSM/Reg

Dear Ms. Cordell:

**Water License Application**  
**N3L2-0004 North American Tungsten Corporation - Cantung Mine**

RWED is requesting an extension to May 21, 2002 to review this application. Our intent is to ensure that the intent of the act to protect social, cultural and economic well-being of residents and communities in the Mackenzie Valley (MVRMA Section 115), is given full consideration.

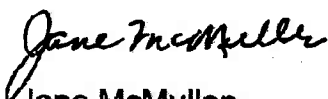
Evidence of public concern, especially in regard to benefits, is noted in the copies of letters and minutes of North American Tungsten meetings attached to the application for a water licence. While we are working with the company to get up-to-date socioeconomic information, RWED does not have all the relevant information at this point.



In addition we have made comment on the Abandonment and Restoration Plan and Contingency and Spill Plan under review through the present water licence with Stephen Mathyk of your office. The information provided in this response is germane to a renewal of the water licence.

Thank you for this opportunity to comment. Should you have any questions, do not hesitate to contact me at 920-8069.

Sincerely,



Jane McMullon,  
Policy & Environmental Assessment Analyst

C Doug Doan,  
Assistant Deputy Minister RWED

Doris Eggers,  
Director Policy and Planning, RWED

Paul Kraft  
Deh Cho Regional Office, RWED

Lionel Marcinkoski  
Environmental Protection, RWED

Frank Lepine,  
Forest Management, RWED

Deb Archibald  
Minerals, Oil and Gas, RWED

Juanita Robinson  
Industrial Initiatives, RWED



Northwest  
Territories Resources, Wildlife and Economic Development

May 10, 2002

Stephen Mathyk  
Regulatory Officer  
Mackenzie Valley Land and Water Board  
PO BOX 2130  
YELLOWKNIFE, NT  
X1A 2P6

VIA FAX: 873-661

Dear Mr. Mathyk:

**Abandonment and Restoration Plan and Revised Spill Contingency Plan  
North American Tungsten Corporation - Cantung Mine Renewal**

The Department of Resources, Wildlife, and Economic Development (RWED) has reviewed the above plans submitted by North American Tungsten Corporation pursuant to water licence N3L2-0004, and offers the following comments for consideration by the Mackenzie Valley Land and Water Board.

New Mine Metal Effluent Regulations (MMER's) are in the gazetting process. These will likely be legislated for Provinces and Territories in 2002. At a minimum, these regulations should be reflected in future plans.

RWED would like to note that the Northwest Territories Environmental Protection legislation has changed significantly since 1986. The proponent should be required to ensure that mining and milling operations meet the newer standards in accordance with the *Environmental Protection Act*.

The Cantung Abandonment and Restoration Plan, prepared in November 2001, requires considerable modifications to ensure that the present standards and terms/conditions of the Mackenzie Valley Land and Water Board are met. Specific recommendations are described below.



Page 8 indicates the existence of an approved licence for the construction and operation of a future Pond 5 for disposal of mine tailings. Details of the design should be required.

Page 16 states that static testing of ARD rock was completed. The proponent should be required to perform kinetic testing of waste rock as well.

Page 16: The proponent has provided very limited information on groundwater monitoring, management and remediation. It has come to RWED's attention that the proponent has experienced numerous excursions of seepage from tailings ponds that do not meet the compliance limits of the current licence. Thus, the proponent should be required to provide additional groundwater information.

Page 19: The proponent states it is quite clear that problems with water discharge from underground workings, ARD, and stable reclaimed mine slopes will not be requiring additional mitigation. This is not adequate and supporting geotechnical reviews must be developed and provided.

Page 24 - Tailings: A thorough assessment of the tailings, dams, inspections, and operation and management of the existing infrastructure requires an independent review by a professional engineering team registered in NWT. There is potential for contaminant discharges into the Nahanni Park ecosystem and downstream to the Fort Liard Area.

Page 29: The proponent's tailings water is managed by exfiltration into the underlying, alluvial aquifer. Seepage and leakage of this magnitude is unacceptable by present standards.

Page 34 Infrastructure: The CanTung Mine Spill Contingency Plan has many deficiencies. In accordance with the *Spill Contingency Planning Regulations* as prepared under Section 34 of the *Environmental Protection Act*, the proponent should be required to provide additional information including:

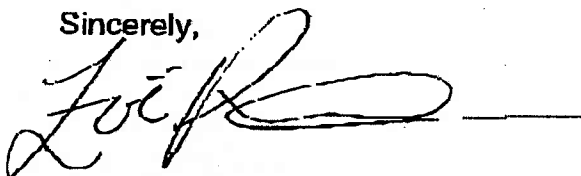
1. Site map;
2. Emergency spill kit inventories;
3. Emergency response personnel names and telephone numbers;
4. Central storage emergency spill kit inventories, and location on site map;
5. Emergency contact information;
6. Spill reporting forms;
7. Record of spill training as completed by response personnel;
8. Page 14 refers to "Additional technical information is available from Environment Canada – Environmental Emergencies section". The proponent should clarify;

9. Appendix E is not a complete list of spill response action plans, those missing should be provided;
10. Hydrocarbon spills are remediated via land farm. Does the proponent have an *approved* land farm? Please forward details; and
11. Are there sufficient supplies in On-Site Spill Kits to effectively deal with spills on the Flat River? (ie: no record of floating booms).

Page 35 - Closure: The proponent's last detailed estimate was completed 5 years ago and thus does not reflect current costing and environmental liability impacts. The proponent should provide updated information.

Should you have any questions regarding the above comments, please do not hesitate to contact myself at 920-6392 or Lionel Marcinkoski at 920-3118.

Sincerely,



Zoë Posynick,  
Environmental Assessment Technician

C. Paul Kraft  
Deh Cho Regional Office, RWED

Lionel Marcinkoski  
Environmental Protection, RWED

Frank Lepine,  
Forest Management, RWED

Deb Archibald  
Minerals, Oil and Gas, RWED

Juanita Robinson  
Industrial Initiatives, RWED

FAX TRANSMISSION SHEET



Northwest Territories Resources, Wildlife and Economic Development

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Date: May 10, 2002

To: Stephen Mathyk & Laurie Cordell  
Mackenzie Valley Land and Water Board

Fax: 873-6610


This fax contains 6 page(s), including the cover sheet.

From: Zoe Posynick  
Environmental Assessment Technician  
Policy, Legislation and Communications  
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e-mail: zoe\_posynick@gov.nt.ca

Comments:

Please see attached regarding Cantung Minesite.

*Please disregard previous fax as  
we had a typo in one of the letters.  
Our Apologies.*



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