

Brenda Backen

From: Laurie Cordell [laurie@mvlwb.com]
ent: Tuesday, April 16, 2002 8:24 AM
o: Brenda Backen; Karl Lauten; Bob Wooley; Stephen Mathyk
Subject: FW: Preliminary screening response NA Tung Water licence



n312-0004letterp
relim screen.w...



Tungsten Water
License Review....

-----Original Message-----

From: Chuck_Blyth@pch.gc.ca [mailto:Chuck_Blyth@pch.gc.ca]
Sent: April 15, 2002 5:08 PM
To: laurie@mvlwb.com
Cc: Kathryn_Emmett@pch.gc.ca; David_Murray@pch.gc.ca;
Katherine_Cumming@pch.gc.ca; Josie_Weninger@pch.gc.ca;
Richard_Leonard@pch.gc.ca
Subject: Preliminary screening response NA Tung Water licence

Please find attached Parks Canada's comments concerning N3L2-0004 preliminary screening.

(See attached file: n312-0004letterprelim screen.wpd) (See attached file: Tungsten Water License Review.doc)

April 12, 2002

Laurie Cordell
Regulatory Officer
Mackenzie Valley Land & Water Board

Water Licence Application (N3L2-0004) North American Tungsten Corporation Ltd.

Thank you once again for allowing Parks Canada, Nahanni National Park Reserve to comment on this water licence application preliminary screening. As I am sure you are aware our interest is to maintain the ecological integrity of Nahanni National Park Reserve and our comments are from this perspective.

Please find attached for your review our comments on the documents provided comprising the preliminary screening. In this document, we recommend that an environmental assessment would be appropriate, given that this permit application relates to the full operation of the mine including abandonment and restoration. We trust that you will consider our input and others in drawing the same conclusion.

I hope this information helps with your preliminary screening. If you have any questions please contact us.

Sincerely,

Chuck Blyth
Superintendent Nahanni National Park Reserve
chuck_blyth@pch.gc.ca
867 - 695 - 3151

Comments on “Application for Renewal of Water License by North American Tungsten Corporation Ltd. (N3L2-0004)”

Summary and Recommendations

The permit under consideration relates to the full operation of the mine including abandonment and restoration. We recommend that an environmental assessment be conducted for the “Application for Renewal of Water License by North American Tungsten Corporation Ltd.” because the project “might have a significant adverse impact on the environment or might be a cause of public concern.” (S. 125(1) of the *Mackenzie Valley Resource Management Act*). The following outlines the reasons for this recommendation.

The current application for renewal of the North American Tungsten Corporation water license does not provide sufficient information to assess the environmental impacts effectively. Nahanni National Park Reserve of Canada (NNPR) protects northern ecosystems and offers internationally recognized recreational river trips. As a World Heritage Site, the uniqueness and value of NNPR is recognized internationally. Located downstream of the mine, NNPR would be particularly affected by changes in water quality or accidental spills. Water quality and quantity information is provided, but the sewage treatment facility is not included and there are contradictions in the information on water treatment procedures. Cumulative impacts are a concern because of the extensive exploration at a site less than 45 km away and other mining operations in the watershed. Cumulative impacts were not addressed. The "CanTung Mine Spill Contingency Plan" does not address the specific conditions of the mining site equipment or environment. The application does not describe the environment, potential impacts or mitigations for aquatic life, air, wildlife, soil and vegetation. NNPR will be protecting the land and providing recreational opportunities for years after the mine closes. As a result, long term environmental protection is important. The "CanTung Abandonment and Restoration Plan" does not adequately address the long-term implications of abandoning the mine. For example, monitoring is only planned for 2 years.

Potential for public concern is also an important consideration. Correspondence to Parks Canada, and press reports relating to major developments upstream in the south Nahanni watershed and findings of preliminary screenings and EA reports on similar projects indicates that there is likely to be public concern.

Comments on “Mining Industry Questionnaire for Water License Applications”

The license up for renewal was originally issued in 1962. The mine has been closed between 1986 and December 2001. The environment, technology and other activities in the area have changed since the original license issue. As a result, reevaluation of the potential impacts and appropriate mitigations is necessary.

Water Quality and Quantity

The application does not describe the sewage treatment facility, making it difficult to judge the appropriateness of this mitigation. Furthermore, contradictions in the

submissions of the North American Tungsten Corporation, make it difficult to predict the future impacts of the operation on water quality and quantity.

Question 1.9

The estimated water balance indicates that 10m³/h from the mine will be discharged into Sardine Creek. Yet Question 3.13 indicates that "There is no direct discharge of mine water. All excess mine water is directed to the mill for reuse."

Question 5.6, 5.7, 5.8

These questions address the use of tailings ponds 3 and 4. In answer to the question "Will the present tailings area contain the entire production...for the life of the project?" The answer was "Yes. An additional one-metre life may need to be added..." Yet in the "Cantung Mine Abandonment and Restoration Plan" the development of a 5th tailing pond is discussed.

Aquatic Life

The application does not describe the aquatic life in the Flat River and Sardine Creek. Although studies were conducted on fish in 1978-1981 (Moore and others 1978; Wickstrom and Lutz 1981), the long term impacts of mining should be examined before further impacts occur. Even without impacts from mining, the aquatic ecosystem may have changed in that time period and should be reevaluated.

Air

The application does not indicate whether the mill has appropriate mitigative measures in place to reduce air pollution, global warming, and ozone depletion in compliance with current best practices.

Wildlife

The application does not indicate whether wildlife populations and use patterns have changed since the water application was issued and whether any additional mitigation measures are necessary.

Soil and Vegetation

The application does not describe waste disposal methods which may impact on soils. The "CanTung Mine Spill Contingency Plan" has some deficiencies as outlined below which may threaten the soil and vegetation.

Cumulative Effects

The application does not describe any potential cumulative effects. The impacts of the CanTung mine in conjunction with other activities in the area may cumulatively impact the environment. Tourism and mineral exploration in the area may contribute to cumulative impacts on the environment. Less than 45 km from the mine, within the Flat River watershed, exploration is continuing for tantalite, columbite and cassiterite. Exploration drilling could begin in the fall of 2002 (BCC; Doppler 2001). Mineral exploration is occurring in at least 2-3 other locations in the Nahanni watershed, including around the Prairie Creek mine. Oil and gas exploration and a gas well are also within the watershed. The cumulative impacts on the watershed need to be considered.

In addition, Nahanni National Park Reserve of Canada provides world class wilderness recreational opportunities. Increased air flights over the park, pollution, and presence of industry could diminish the quality of this experience. For example, a permit has been requested to seismic exploration on the river immediately downstream of the park.

Comments on “CanTung Mine Abandonment and Restoration Plan”

The abandonment and restoration plan has two general weaknesses. First, the language in the plan makes it difficult to determine what actions will actually be taken. For example, the following phrases were used: “Alternative techniques...could be used” (p. 19), “this control could be enhanced...” (p. 16), “it is recommended...” (p. 31), “it would be prudent...”(p.31).

Second, the plan does not address the long term implications adequately. The mandate of Parks Canada and Nahanni National Park Reserve of Canada is to “leave [national parks] unimpaired for the enjoyment of future generations” S. 4(1) of the *Canada National Parks Act*. As a result, the impacts over many decades must be addressed. The acid rock drainage (ARD) potential is particularly of concern in the long term, but the report is vague about the future (pg. 16, 30). The potential for cumulative effects of ARD with other mineral operations in the area is also a concern. Furthermore there is only a commitment to monitoring for two years after the closure is completed.

Specific Comments

- Vegetation and Land Use description (pg. 15) fails to mention the tourism industry and Nahanni National Park Reserve of Canada.
- What is the evidence that “effects of the mining activity on local wildlife are not readily discernible”? (pg. 15)
- How often are the total suspended solids (TSS) above the specified limit? Is this because of runoff or because of insufficient capacity in water treatment facilities?
- Although the plan identifies water management of the open pit workings to be an important issue, it is never addressed. What potential is there for acid rock drainage (ARD) from the open pit workings? (pg. 17-18)
- Although the plan identifies ARD from the underground workings as an issue to be considered, it is never addressed. Similarly, the abandonment of the equipment, buildings and shops associated with underground is never addressed. (pg. 18-20)
- Although the plan identifies “the removal and/or redesign of water management structures” and re-vegetation of the processing facilities site as important issues, however they are never addressed (pg 21)
- Where does any water flowing from breached Pond 4 go? (pg 32)
- Who will be responsible for monitoring and any ongoing issues if the facility is sold to a tourism operation or another mining company?

Comments on “CanTung Mine Spill Contingency Plan”

The plan states “By successfully preventing spills of materials at CanTung the environmental and safety risks are mitigated and the costs of training personnel are recovered.” A spill of 23, 340 L of diesel fuel on January 18, 2002 emphasizes the need for effective prevention and spill contingency plan.

The training for all personnel seems inadequate. Reading a large manual (especially if there are poor literacy skills) is unlikely to ensure the personnel know the most important instructions. Training standards for the site safety officer are not identified. As the principle person responsible for clean up, this is important. If the site safety officer is not on site, an alternate with training is not identified.

The spill contingency plan is general and does not address the specifics of the site. Instructions for clean up include the use of equipment (skimmers, numerous types of pumps, tankers etc.), but the equipment list in the plan does not specify that this equipment is on site. The plan should indicate which equipment is available on site and which needs to be obtained from elsewhere. The plan also does not address the specifics of the environment around the site. What responses would be appropriate for Sardine Creek and for the Flat River at various water levels? Other specific environmental conditions of the site should also be included in the clean up approaches.

The sewage treatment facility is not addressed in the plan.

References

BCC. War Eagle Mining Company Inc. Corporate Summary. [Online] Available at: http://www.brittoncapital.com/war_eagle/index.html. Accessed April 7, 2002.

Doppler S. 2001. The Doppler Report: War Eagle Mining Company, Inc. 12 p.

Moore JW, Hardin MJ, Sergy GA. 1978. The effects of metal mines on aquatic ecosystems in the Northwest Territories I. Canada Tungsten Mining Corporation Limited. Northwest Region Environmental Protection Services Fisheries and Environment Canada. Report nr EPS 5-NW-78-8. 83 p.

Wickstrom RD, Lutz A. 1981. Tungsten and copper analysis of fish and sediments from the Lower Flat River Nahanni National Park N.W.T. Winnipeg: Canadian Wildlife Service. 34 p.