



**CANADIAN PARKS AND  
WILDERNESS SOCIETY  
NWT CHAPTER**

Box 1934, Yellowknife, NT X1A 2P4

Phone: (867) 873-9893 Fax: (867) 873-9593 e-mail: cpawsnwt@theedge.ca

June 25, 2003

Martin Haeefele  
Mackenzie Valley Environmental Impact Review Board  
Box 938, 5102 50<sup>th</sup> Avenue  
Yellowknife, NT X1A 2N7  
By fax:

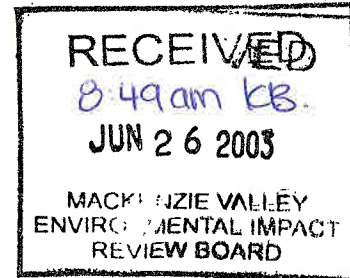
**Re: Northrock Summit Creek B-44 Drilling Program Environmental Assessment**

Dear Mr. Haeefele,

Please see the attached Information Requests for the aforementioned project. If you have any questions or concerns, please do not hesitate to contact me at 867.873.9893 or cpawsnwt\_cc@theedge.ca.

Sincerely,

Jennifer Morin  
Conservation Coordinator  
CPAWS-NWT



Attach.

cc. Matt Law, Northrock Resources Ltd. (By fax: 403-213-7487)



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NWT CHAPTER**

# Fax

**To:** Martin Haefele  
Matt Law

**From:** Jennifer Morin  
Conservation Projects Coordinator  
CPAWS-NWT

**Fax:** 766-7074  
403-213-7487

**Date:** June 25, 2003

**Pages:** 5 (including cover)

**Re: Northrock Summit Creek B-44 Drilling Program Environmental Assessment**

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IRs from CPAWS-NWT

*Thanks -  
Jm*

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4<sup>th</sup> Floor Cunningham Building, 4921 - 49<sup>th</sup> St  
Box 1934, Yellowknife, NT X1A 2P4  
Tel: 867.873.9893 Fax: 867.873.9593  
cpawsnwt\_cc@theedge.ca

**IR #: 1(CPAWS)**

**Source: Canadian Parks and Wilderness Society Northwest Territories Chapter**

**To: Northrock Resources Ltd. (Developer)**

**DAR Section: C. Development Description/ E. Alternatives**

**Terms of Reference Section: C. Development Description/ E. Alternatives**

**Preamble:**

In these sections, the Developer describes timing, access road and wellsite, construction methods, operations, waste management, water use, and abandonment and restoration as well as alternatives to access, wellsite, waste management, and water use. In these descriptions, the Developer does not appear to have described in detail 'best practices', specific mitigative measures, or alternative access/drilling/operations methods to minimize environmental impacts (i.e. compaction of ground, width of proposed seismic lines, etc.).

**Request:**

1. a) Will the Developer use low-ground-pressure equipment, operating on a snow pack of at least 10 cm?  
b) If so, in areas where snow cover may not be adequate to protect ground cover, will tracked equipment be used?
2. Has the Developer considered instructing equipment operators to not disturb the organic mat, and that all access be clearly marked prior to equipment movement to reduce the possibility of surface disturbance?
3. Has the Developer considered holding regular meetings to discuss/remind workers of the importance of avoiding damage to the organic mat and to permafrost?
4. Given that inadvertent surface disturbance can significantly damage surface thermal protection in areas of permafrost, should disturbance occur, will these areas be repaired immediately and covered with slash as appropriate?
5. What control measures will be taken by the Developer in areas prone to surface drainage or erosion?
6. Has the Developer considered minimizing the visual impacts of the cleared lines and impacts on wildlife through the use of a meandering line approach and a variable line-width approach combined with avoidance cutting for the access route?
7. Has the Developer considered lower-impact devices, such as crushers<sup>1</sup>, as an alternative to bulldozers?

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<sup>1</sup> Crushers grind trees and stumps into mulch, promoting faster vegetation re-growth and reducing clean-up requirements.

8. Given concern in the Inuvialuit and Gwich'in Settlement Regions over long-term stability of sumps located in areas of permafrost, what mitigative measures will the Developer undertake to maximize long-term sump stability?
9. Has the Developer identified any sensitive areas, densely treed areas, and areas within five metres of any stream or water crossing that may require hand clearing?
10. Has the Developer considered decreasing the width of rights-of-way at stream crossings to preserve riparian habitats?
11. Given the potential for windrows to impact wildlife movement and become fire hazards, has the Developer considered felling trees using a "spray cutting" (out from the right-of-way centre) pattern, which leaves trees in the vicinity of the right-of-way?
12. Has the developer considered using oil drip pans on major equipment?
13. What training/instruction will the Developer's contractors and employees receive on wildlife awareness, wildlife avoidance, and garbage control?
14. Has the Developer considered instituting a system of performance-based incentives to promote best practices by contractors?<sup>2</sup>
15. What type of qualified environmental personnel will be on site to supervise drilling operations in environmentally sensitive areas?

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<sup>2</sup> For example, under such a system the contractor would receive a penalty for surface damage, excessive clearing, and other environmentally harmful practices.

**IR #: 2 (CPAWS)****Source: Canadian Parks and Wilderness Society Northwest Territories Chapter****To: Northrock Resources Ltd. (Developer)****DAR Section: H. Assessment Boundaries/L. Wildlife Harvesting/J. Cultural and Heritage Resources/K. Access Road****Terms of Reference Section: H. Assessment Boundaries/L. Wildlife Harvesting/J. Cultural and Heritage Resources/K. Access Road****Preamble:**

In these sections, the Developer describes the direct and indirect impacts as well as potential cumulative effects. CPAWS-NWT believes the Developer should be required to review the **full cumulative effects of their activities**. This section does not adequately identify the full cumulative life-cycle impacts – in particular, consideration of further future development. As the development unfolds, new information becomes available, and operators and regulatory bodies should be required to update and review the potential full life-cycle impact of their development.

**Request:**

CPAWS-NWT is requesting the Developer to provide a description of cumulative effects of potential full life-cycle activities.