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March 3, 2004

Mr. Vern Christensen
Executive Director
Mackenzie Valley Environmental Impact Review Board
Box 938, 5102-50th Avenue
Yellowknife, NT X1A 2N7

Your File: EA-03-006

Dear Sir,

Re: Mackenzie Valley Environmental Impact Review Board (“Review Board”) - Environmental Assessment Decision - Snowfield Development Corp. dated February 26, 2004

Snowfield Development Corp. (“Snowfield”) is in receipt of the Review Board’s Environmental Assessment Decision and its Summary Report of Environmental Assessment dated February 26, 2004 with respect to Snowfield’s Ticho Project proposed exploration programs in the Drybones Bay area, Great Slave Lake, NT.

Before proceeding, I would take this opportunity to thank the Review Board and its staff for your collective efforts in undertaking your Environmental Assessment and Public Hearing of our Ticho Project land use permit application and for the positive recommendation to proceed with our proposed exploration programs. Your staff members were all very positive and professional during all of our direct dealings.

The purpose of my letter is to seek clarification on the interpretation of certain aspects of the Review Boards recommendations. In particular, Snowfield does not fully comprehend the intentions and objectives of the Review Board as presented in the first two recommendation found on page iii of the Review Board Environmental Assessment Decision and page 50/51 of the Summary Report of Environmental Assessment:

The Review Boards first recommendation, found on page iii of the Review Board Environmental Assessment Decision and page 50/51 of the Summary Report of Environmental Assessment, states:

“SDC will not commence drilling within the three kilometre zone until the operational areas within the claim blocks are surveyed by a qualified archaeologist, accompanied by an Aboriginal elder and a translator if required, to detect suspected archaeological, historical, burial or cultural sites.”

It is submitted that the specific wording of this recommendation precludes drilling within the three kilometre zone but does not preclude any other operations including, for example, trenching for bulk sampling. Additionally, does this recommendation preclude, where operationally advisable, drilling on small lakes and ponds where no damage would occur to any potential archaeological sites as described in sentence 2 of paragraph 1 of the Review Boards Conclusions on page 50 of the Summary report which states *“Any operations on lakes or ponds suggested by SDC would avoid these sites”*?

The Review Boards second recommendation, found on page iii of the Review Board Environmental Assessment Decision and page 50/51 of the Summary Report of Environmental Assessment, states:

“SDC will only use access routes in the three kilometre zone if routes are scouted by an Aboriginal elder, a translator, if required, and a qualified archaeologist for suspected archaeological, historical, burial or cultural sites. Use of these access routes will only be permitted over packed snow or on lake ice.”

It is submitted that the specific wording of this recommendation would permit, following granting of land use permitting, immediate access over routes in the three kilometre zone if those routes had been scouted by an Aboriginal elder, a translator, if required, and a qualified archaeologist and no potential archaeological, historical,

burial or cultural sites were located, or indicated, provided that use of these routes was undertaken over packed snow or on lake ice. It is submitted that the limitation of this recommendation would, in the absence of packed snow or lake ice, forever preclude any summer use of access routes in the three kilometre zone throughout the full term of the land use permit even if such routes had been previously scouted by an Aboriginal elder, a translator, if required, and a qualified archaeologist in addition to a full blown archaeological survey having been undertaken by a qualified and licensed archaeologist in conjunction with First Nations elders from the local aboriginal communities.

Snowfield submits that, should the Review Board consider providing clarification on the interpretation of certain aspects of the Review Boards recommendations, that it might consider reviewing the recommendations contained in the January 6th, 2004, Response to the MVEIRB Regarding the Snowfield Environmental Assessment letter submitted by Mr. Tom Andrews, Territorial Archaeologist, Prince of Wales Northern Heritage Centre. Of particular interest to Snowfield were the Specific Recommendations found in para. 2 on page 5 of that letter which states *"If the Review Board decides to recommend that the proposed development be permitted to proceed, we advise that the following steps be implemented during the regulatory review to ensure that the impacts to archaeological and other cultural sites be minimized. Please note that we have no concern with development activities that occur exclusively on lake ice, as long as the 30 metre protection buffer is maintained."* Snowfield has previously committed to undertaking those General Recommendations found in that letter and would specifically draw the Review Boards attention to Item 3) of those recommendations which states that *"The Developer be restricted to operating on snow pack or lake ice to ensure that direct impact to sites is minimized or eliminated."*

In the event that the Review Board consider clarifying certain aspects of its first recommendation to include drilling operations on ice over lakes or ponds and to permit drilling operations over packed snow and ice in concurrence with the Review Boards second recommendation regarding access, that revised recommendation, if incorporated into a Class "A" land use permit, would allow Snowfield to possibly complete a portion of its current proposed Spring 2004 delineation drilling program, particularly that part to be undertaken over frozen lakes and ponds, without having to wait until the following winter season, almost a year away.

Additionally, Snowfield is requesting that the Review Board consider clarifying its second recommendation in a manner that would enable Snowfield to also access the Ticho Project during summer months, in the absence of packed snow or ice, over existing, or new, access routes following completion of a comprehensive survey by a qualified archaeologist, accompanied by an Aboriginal elder and a translator if required.

In an effort to expedite the issuance of a land use permit that would perhaps permit Snowfield to undertake a portion of its proposed Spring 2004 exploration programs on the Ticho Project this year while ice/snow conditions permit, Snowfield is proposing to initiate the archaeological scouting/survey aspects of the Review Boards recommendation in the immediate future, prior to the actual issuance of the land use permit, in order for the resulting scouting/survey data to be available to the various parties, including the Mackenzie Valley Land and Water Board, to assist in adopting the terms for such a land use permit. In this regard, Snowfield is currently negotiating with Ms. Jean Bussey of Points West Heritage Consulting Ltd., a well recognized archaeological consulting firm with extensive experience in the Northwest Territories. The objective would be for Ms. Bussey, in conjunction with Aboriginal elders, and translator if required, to undertake a preliminary scouting examination of the existing access route to the Mud Lake exploration area to confirm that use under snow cover conditions would resolve any issues. Ms. Bussey and the elders would immediately thereafter commence a preliminary assessment of the exploration areas to permit planning for the archaeological survey that will be undertaken under snow-free conditions. Snowfield is presently in the process of contacting First Nations communities to engage one or two Aboriginal elders and a translator to work with Ms. Bussey for this purpose. Snowfield hopes to have the

access route scouting and the preliminary archaeological survey assessment work completed within two to three weeks and a report thereof available for submission to the various parties and regulatory authorities shortly thereafter.

For all of the above stated reasons, Snowfield respectfully requests that the Review Board give its early attention and consideration to interpreting, or perhaps re-phrasing, the first two recommendations of the Review Boards Environmental Assessment Decision in a manner that would accommodate Snowfield with respect to the issues presented herein. In support of this request, Snowfield submits that, as stated by Snowfield in its closing remarks during the January 13, 2004, Public Hearing, 'missing the forthcoming winter's drilling season would (will) be economically devastating to Snowfield'.

Respectfully



Robert T. Paterson,
President & C.E.O.
Snowfield Development Corp.