

EA0405-002

Martin Haefele

From: Jennifer Morin [cpawsnwt_cc@theedge.ca]
Sent: June 23, 2005 10:08 AM
To: Martin Haefele
Subject: Re: CPAWS-WNT's IRs

CanZinc

Follow Up Flag: Follow up
Flag Status: Red



CPAWS-NWT IRs _AVG
Phase III June 2... tification_.txt (206 I
Please see attached.

Thanks,

--
Jennifer Morin
Senior Conservation Coordinator
CPAWS-NWT
867.873.9893 ph
867.873.9593 fx
www.cpaws.org

93





CPAWS

CANADIAN PARKS AND WILDERNESS SOCIETY
NWT CHAPTER, BOX 1934, YELLOWKNIFE, NT, X1A 2R2
p 867.873.9893 f 867.873.9593 e cpawsnwt@theedge.ca

June 22, 2005

Martin Haefele
Regulatory Officer
Mackenzie Valley Environmental Impact Review Board
Box 2130
Yellowknife, NT, X1A 2P6
By email

**Re: CPAWS-NWT's Information Requests to Canadian Zinc Corporation
Phase III Drilling Program**

Dear Mr. Haefele:

Please accept this letter from the Northwest Territories Chapter of the Canadian Parks and Wilderness Society (CPAWS-NWT) on the aforementioned subject.

CPAWS-NWT Request #1

To: Canadian Zinc Corporation (CZN)

DAR Section: 2.1.1 Roads to be Used

TOR Section: B-1

Preamble: The maps provided in this section are helpful, however there is limited quantitative detail of the proposed activities. For example, in section 2.1.1, the "preliminary plan" is for initial drilling to take place within zones 6 (5 drill sites), 7 (4 drill sites), 8 (3 drill sites). There would also be 2 holes completed for each of the drill sites, for a total of 24 holes. It is also noted that a heli-portable rig will be used at 8 drill pads in zones 7 and 8 (4 each). It is unclear where the additional drill sites and holes will be drilled in these and/or other zones. Additionally, it is unclear how many spur roads will be constructed (although it is estimated that they would be up to 100 metres in length). CPAWS-NWT feels it is critical to include quantitative estimates to properly assess the impacts of the proposed activities, as well as plan for the reclamation of these activities.

Request: Please provide the following quantitative estimates for the proposed activities:

- a) the total number of well pads to be constructed in addition to the estimated 20 well pads noted in section 2.1.1;
- b) the number of metres of new spur road construction and total number of spur roads;
- c) the total number of metres of the existing road network that will be used during the proposed activities ;
- d) the total number of metres of new road reconstruction; and
- e) the total number of metres of roads that are proposed to be used or reconstructed within 30 m of creeks/streams.

CPAWS-NWT Request #2

To: CZN

DAR Section: 2.1.2 Roads Erosion, Stability and Construction

TOR Section: B-1 f)

Preamble: The TOR requested CZN to “provide protocols or practice codes that CZN uses to identify problems with the road network, and mitigation measures proposed to alleviate the situation”. CZN notes that they have “not used any such protocols or practice codes”, that additional information could be found in PDAC’s E3 guidelines, and a request has been made to DIAND for more information. As such, CPAWS-NWT feels the DAR does not adequately respond to the request.

Request: Please provide specific information on how road erosion, stability and construction problems will be identified and what mitigative measures will be used to alleviate the problems based on the information provided from DIAND.

CPAWS-NWT Request #3

To: CZN

DAR Section: 2.3 Drilling and Drilling Sites

TOR Section: B-3

Preamble: In order to adequately assess potential impacts from drilling operations, the total quantities of drilling additives that will be used in the proposed activities, their respective chemical information

(Material Safety and Data Sheets), and the concentration of each additive in the drill water and cuttings should be provided. Additionally, it is noted in the Detailed Project Description that “excess water and small quantities of drill water and cuttings” will be sent to a pit dug in overburden material.

Request: Please provide the total quantities of the drilling additives that will be used in the proposed activities, their respective chemical information (Material Safety and Data Sheets), and the concentration of each additive in the drill water and cuttings.

Please provide a specific estimate volume and concentration (per well) of “excess water and small quantities of drill water and cuttings” that will be sent to the pit.

Will pits be dug in non-permafrost areas? If so, how will the chemical composition of the additives (e.g. calcium chloride as a freeze prevention agent) affect the permafrost?

CPAWS-NWT Request #4

To: Mackenzie Valley Environmental Impact Review Board (MVEIRB)

DAR Section: 3.0 Project Response to Environmental Sensitivity

TOR Section: C

Preamble: Throughout this section, there are references to thresholds and mitigation measures (4th paragraph, page 25; 2nd paragraph, first sentence, page 26; 4th paragraph, last sentence, page 26) however it is not clear exactly what the quantitative or “measurable” thresholds are and what the specific proposed mitigative measures will be. It is also noted that the developer will engage a qualified Biologist to undertake surveys, provide advice on wildlife issues, assess habitat conditions, develop guidelines, etc.

Request: Would the MVEIRB consider identifying quantitative thresholds and mitigative measures by a qualified independent Biologist a requirement to properly assess the proposed activities prior to concluding the assessment and prior to permitting?

CPAWS-NWT Request #5

To: CZN

DAR Section: 4.0 Public Consultation

TOR Section: D

Preamble: In this section the developer notes, "CZN has developed a close working relationship with the Dehcho Land Use Planning Committee and has agreed to participate fully in the process." At the time of writing of the DAR, the Committee had released a 'Working Draft' of the Land Use Plan and has recently released a more complete Draft Dehcho Land Use Plan, both of which include terms and conditions for development in the region. Given that the Final Plan is scheduled to be submitted for approval in March 2006, it is unclear how the developer will address some of the requirements under the terms and conditions of the Draft Dehcho Land Use Plan prior to and following approval. For example, under 'Digital Pre- and Post-Operation Mapping' page 106, the Draft Plan states,

"Regulatory Authorities will require Developers to provide the Dehcho Land Use Planning Committee, affected First Nations and communities, and Regulatory Authorities digital mapping of their proposed development (new roads, seismic, well sites, cut blocks, etc.), as GPS waypoints, shapefiles, digitized air photos, or satellite imagery at a minimum resolution of 5 metres at the time the application is submitted and within 30 days following construction of the development, to allow monitoring of the actual development footprint".

Request: In relation to project consultation and coordination, please specify how the project will be compatible with the applicable draft terms and conditions for development, as outlined in the terms and conditions in the Draft Dehcho Land Use Plan.

CPAWS-NWT Request #6

To: Department of Indian and Northern Affairs Canada

DAR Section: 5.3 Reclamation

TOR Section: E-3

Preamble: CPAWS-NWT feels this section does not adequately address the reclamation roles and responsibilities of the developer and/or the federal government.

In this section the developer notes, "CZN does not have a valid Land Use Permit for the Phase 3 drilling area, and there are no provisions for reclamation within the existing Mining Leases and

Mineral Claims. Consequently, CZN has no authority to reclaim the existing roads.” In a previous section (2.1.3) it is also noted that “there is no bonding in existence for reclamation of existing roads associated with the Mining Leases at Prairie Creek. CZN anticipates that, at the regulatory stage, bonding requirements will be discussed for the reclamation of the roads **used** for the Phase 3 drilling program.” (emphasis added)

It is understood that when the mine site, infrastructure, mining leases and mineral claims were purchased from the previous owners, CZN assumed all associated rights as well as current and future liabilities. CPAWS-NWT believes that the developer should be responsible for reclamation of the entire site, especially if the developer will be gaining the benefits of using and upgrading existing infrastructure. It is unclear who will ultimately be responsible for the eventual reclamation of the existing road network, if not the developer.

Request: Given that the federal government has a \$555 million reclamation liability for abandoned mine sites in the North¹, and has adopted NWT Mine Site Reclamation Policy (2002) and a Sustainable Development Strategy (2004-2006),

- a) Who is responsible for the reclamation of the existing road network which the developer will benefit from using and upgrading?
- b) How does the reclamation section of the DAR adequately address reclamation requirements to ensure the complete and proper reclamation of the proposed activities and roads **used** during the Phase 3 drilling program?
- c) What are the estimated costs to reclaim the existing road network in the Prairie Creek area up to kilometre 16 on the winter road (114.3 km total length) and the *new* road upgrading, spur road construction, drill pads, and/or other disturbances related to this project?

CPAWS-NWT Request #7

To: CZN (and/or DIAND and/or GNWT)

DAR Section: 5.3 Reclamation

TOR Section: E-3

¹ 2002 Report of the Commissioner of the Environment and Sustainable Development to the House of Commons. Chapter 3: Abandoned Mines in the North. Section 3.1.

Preamble: The developer notes that “a seed mix of native vegetation will be selected to quickly re-establish stable conditions and plant cover”. Based on a search of northern seed suppliers, no “native seed mixes” appear to be available for the Taiga Cordillera Ecozone.

Request: Please research the availability of an appropriate native seed mix for the Taiga Cordillera Ecozone. If available, please provide supplier details along with list of plant species and confirmation that the species are all native to this Ecozone and to the Prairie Creek area. If not, what innovative mitigative measures will be used to ensure conditions will be stabilized and no exotic plant species will be introduced to the detriment of the relatively remote, isolated and native Ecozone?

Thank you for this opportunity to provide comments. If you have any questions about these information requests, please do not hesitate to contact me at 867.873.9893.

Sincerely,

Jennifer Morin
Senior Conservation Coordinator
CPAWS-NWT