

October 2, 2012

VIA EMAIL

Chuck Hubert
Senior Environmental Assessment Officer
Mackenzie Valley Environmental Impact Review Board
200 Scotia Centre
Box 938, 5102-50th Ave
Yellowknife, NT
X1A 2N7

Dear Mr. Hubert,

**Re: Public Hearing Undertaking #3: Clarification on Recommendations
EA0809-004 NICO Project, Fortune Minerals Ltd.**

During the Fortune Minerals Limited (Fortune) NICO Project (Project) Public Hearing on August 30, 2012, Government of the Northwest Territories (GNWT) representatives provided preliminary wording for potential Project commitments. The comments were intended to improve the wording in Fortune's commitments provided to date. This letter provides clarification regarding the verbal comments on commitments.

Fortune's July 5, 2012 List of Commitments provided a follow-up and monitoring commitment (commitment 8.10), specifically to provide a Wildlife Effects Monitoring Program (WEMP). The specific objectives, as detailed in commitment 8.13, included:

- Provide a process for regulators and communities to participate in the development of caribou effects mitigation and monitoring;
- Consider and incorporate, where possible, traditional knowledge;
- Provide mine managers with clear reasons for making decisions regarding NICO Project environmental management;
- Provide the proposed environmental design features, and mitigation policies and practices;
- Assess the effectiveness of mitigation; and
- Verify the accuracy of impact predictions made in the Developer's Assessment Report, reduce uncertainty of impact predictions, and identify anticipated effects.

The GNWT is in agreement with these mitigation commitments and the approach proposed by Fortune to further develop the WEMP. However, the GNWT typically recommends separating a Wildlife and Wildlife Habitat Protection Plan from a focused follow-up program called a WEMP. Fortune has blended the two concepts and much of the current document falls into the category of best practice mitigations and monitoring of those mitigations found within a Wildlife and Wildlife Habitat Protection Plan.

As a Land and Water Board may consider the protection of wildlife under the Mackenzie Valley Land Use Regulations Subsection 26(1) (h), the GNWT suggests that renaming the WEMP document would more likely result in the inclusion of a plan in the future. The GNWT is aware that many of Fortune's commitments that will serve to protect wildlife will be captured in waste management plans and human safety plans.

The GNWT has also raised the access to caribou herd issue. During the hearings many other parties also indicated concern to Fortune. The GNWT comment was intended to elicit support for monitoring of the proposed access route to the mine. Fortune does not have a responsibility for developing harvest plans, as these are the responsibility of government and Aboriginal communities. Involvement in access monitoring can be considered during future discussions.

Please contact me at gavin_more@gov.nt.ca if you may require any further details.

Sincerely

A handwritten signature in blue ink that reads "Gavin More". The signature is cursive and fluid.

Gavin More
Manager
Environmental Assessment and Monitoring
Environment and Natural Resources