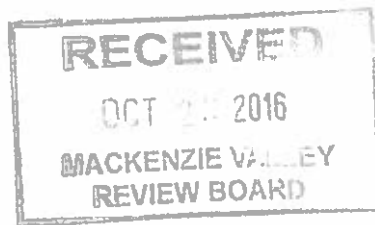


Marie Adams  
Box 1523  
Yellowknife, NT, X1A 2R1



October 20, 2016

Ms Joanne Deneron, Chair,  
Mackenzie Valley Environmental Impact Review Board (Review Board)  
200 Scotia Centre  
Box 938, 5102 50<sup>th</sup> Ave.  
Yellowknife, NT X1A 2N7

Re: Demolition of the Con Mine Robertson Shaft complex

I am writing to the Mackenzie Valley Environmental Impact Review Board (MVEIRB) as a member of the NWT Mine Heritage Society to express our collective concerns over health, safety and environmental issues related to the planned demolition of the Con Mine Robertson Shaft complex. We base our concerns on a review of the 2014 Con Mine Final Closure and Reclamation Plan (CRP).

Section 114 of the Mackenzie Valley Resource Management Act (the *MVRMA*) requires that a Review Board be established to ensure that the impact on the environment of proposed developments receives careful consideration before actions are taken in connection with them to ensure that the concerns of aboriginal people and the general public are taken into account in that process.

As a member of the NWT Mine Heritage Society and a member of the Robertson Economic Development Society, we submit that the 2014 CRP contains inadequate and insufficient detail on the chronology of demolition activities for the Shaft complex and inadequate information on the methods to be employed for the demolition of the Shaft and associated infrastructure. As you are aware, Con Mine is located adjacent to residential neighbourhoods and overlooks Yellowknife Bay on Great Salve Lake. Given the recent remediation of Giant Mine and the resulting concerns for contamination of the environment and its impact on the general public in an area that is largely non-residential, we urge you to consider the potential for catastrophe that may result if remediation efforts at the Con Mine site are not reviewed and given the attention deserved.

The CRP identifies that the demolition of the Robertson Headframe and shaft complex will follow the demolition of the other structures in the area, none of which are remotely comparable to the headframe both in size and potential for contamination. We respectfully submit that the Review Board assess the proposed plan for the containment of dust and debris from a demolition process and the potential effect of dust clouds and other toxic substances on the surrounding environment. The potential for contamination is significant to the environment, fisheries and general public.

The CRP states that the Robertson Shaft complex ranks *third* on a list of seven sectors being considered for decommissioning and demolition (with only the mill, plant and tailings ponds being ranked higher for arsenic contamination). As the Developer's own assessment of arsenic contamination on the site includes a high rating for the Shaft complex, we respectfully submit that the Review Board exercise its authority and conduct an Environmental Assessment on this particular sector of the decommissioning, demolition and remediation of the Con Mine site.

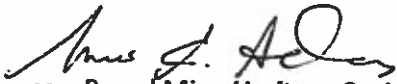
While we acknowledge that there are other permits and permissions that the Developer may have had to obtain, it is our contention that there has been little in the way of a substantive assessment of the risks involved. Following the demolition of the Robertson shaft complex, there is no indication of what efforts will be made to ensure that the risks involved with potential arsenic contamination are addressed as the CRP was submitted while negotiation of maintaining the headframe was ongoing.

Accordingly, we submit that an environmental assessment on this sector of the proposed project should be completed to ensure that members of the general public including first nations communities are informed of any risks of contamination and that the associated risks are identified and comprehensively addressed.

In conclusion, we urge the Review Board, to exercise its authority and conduct an Environmental Assessment pursuant to section 126(3) of the Act of this planned demolition in order to assess the potential risks on the citizens of the Yellowknife area and the surrounding environment.

Sincerely,

Marie Adams

A handwritten signature in black ink, appearing to read "Marie Adams". The signature is fluid and cursive, with a large initial "M" and "A".

cc – Board Mine Heritage Society

members, Robertson Economic Development Society



PRESERVING OUR HERITAGE

Box 2818, Yellowknife, NT X1A 2R1

Tel: (867) 873-6078

Email: [info@nwtminingheritage.com](mailto:info@nwtminingheritage.com)

Website: [nwtminingheritage.com](http://nwtminingheritage.com)

---

Tracey Bryant  
Coordinator  
NWT Mining Heritage Society  
Yellowknife, NT, X1A 2R1

October 20, 2016

Ms Joanne Deneron, Chair,  
Mackenzie Valley Environmental Impact Review Board (Review Board)  
200 Scotia Centre  
Box 938, 5102 50<sup>th</sup> Ave.  
Yellowknife, NT X1A 2N7

Re: Demolition of the Con Mine Robertson Shaft complex

I am writing to the Mackenzie Valley Environmental Impact Review Board (MVEIRB) on behalf of the NWT Mine Heritage Society to express our concerns over health, safety and environmental issues related to the planned demolition of the Con Mine Robertson Shaft complex. We base our concerns on a review of the 2014 Con Mine Final Closure and Reclamation Plan (CRP).

Section 114 of the Mackenzie Valley Resource Management Act (the *MVRMA*) requires that a Review Board be established to ensure that the impact on the environment of proposed developments receives careful consideration before actions are taken in connection with them to ensure that the concerns of aboriginal people and the general public are taken into account in that process.

As a member of the NWT Mine Heritage Society we submit that the 2014 CRP contains inadequate and insufficient detail on the chronology of demolition activities for the Shaft complex and inadequate information on the methods to be employed for the demolition of the Shaft and associated infrastructure. As you are aware, Con Mine is located adjacent to residential neighbourhoods and overlooks Yellowknife Bay on Great Salve Lake. Given the recent remediation of Giant Mine and the resulting concerns for contamination of the environment and its impact on the general public in an area that is largely non-residential, we

urge you to consider the potential for catastrophe that may result if remediation efforts at the Con Mine site are not reviewed and given the attention deserved.

The CRP identifies that the demolition of the Robertson Headframe and shaft complex will follow the demolition of the other structures in the area, none of which are remotely comparable to the headframe both in size and potential for contamination. We respectfully submit that the Review Board assesses the proposed plan for the containment of dust and debris from a demolition process and the potential effect of dust clouds and other toxic substances on the surrounding environment. The potential for contamination is significant to the environment, fisheries and general public.

The CRP states that the Robertson Shaft complex ranks **third** on a list of seven sectors being considered for decommissioning and demolition (with only the mill, plant and tailings ponds being ranked higher for arsenic contamination). As the Developer's own assessment of arsenic contamination on the site includes a high rating for the Shaft complex, we respectfully submit that the Review Board exercise its authority and conduct an Environmental Assessment on this particular sector of the decommissioning, demolition and remediation of the Con Mine site.

While we acknowledge that there are other permits and permissions that the Developer may have had to obtain, it is our contention that there has been little in the way of a substantive assessment of the risks involved. Following the demolition of the Robertson shaft complex, there is no indication of what efforts will be made to ensure that the risks involved with potential arsenic contamination are addressed as the CRP was submitted while negotiation of maintaining the headframe was ongoing.

Accordingly, we submit that an environmental assessment on this sector of the proposed project should be completed to ensure that members of the general public including first nations communities are informed of any risks of contamination and that the associated risks are identified and comprehensively addressed.

In conclusion, we urge the Review Board, to exercise its authority and conduct an Environmental Assessment pursuant to section 126(3) of the *Act* of this planned demolition in order to assess the potential risks on the citizens of the Yellowknife area and the surrounding environment.

Sincerely,

**Tracey Bryant**

Coordinator

NWT Mining Heritage Society

cc – Board Mine Heritage Society