



## **Tłıchǫ Government**

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June 29, 2012

### **Mackenzie Valley Environmental Impact Review Board**

200 Scotia Centre  
Box 938, 5102-50th Ave  
Yellowknife, NT X1A 2N7

Cc: Nichole Spencer

### **Re: IR Submission EA0809-003 [2008]**

Dear Ms. Spencer,

The Tłıchǫ Government provides the following information requests (IR's) for Tyhee NWT Corp. The Tłıchǫ Government feels that this information is necessary for the purposes of the Yellowknife Gold Project.

The Tłıchǫ government and its consultants are available to discuss these IR's and their applicable rationale with Tyhee NWT Corp and the Mackenzie Valley Environmental Impact Review Board.

We thank you for the opportunity to provide the requested information. If you have any questions or concerns, please do not hesitate to contact us.

Sincerely,

Laura Duncan

Tłıchǫ Executive Officer

Ph: 867-766-3391

Email: [lauraduncan@Tlicho.com](mailto:lauraduncan@Tlicho.com)

**IR Number: 1.0****To:** Tyhee NWT Corp**From:** Tłıchǫ Government**Subject:** Caribou Baseline Information**Reference:** DAR 6.6.1.1**Preamble:**

The DAR states: "The YGP lies within the Bathurst herd's winter range; however it is outside known important migration corridors."

**Request:**

- 1.1) Please provide a map of the known important migration corridors with corresponding definitions.
- 1.2) Please provide a map and analysis that evaluates the utilization of this area by the Bathurst Caribou herd including the number of interactions that collared caribou would have had with either secondary route or the road to Nicholas Lake.
- 1.3) Please provide a summary of the mitigation measures regarding protection for the Bathurst caribou herd.

**IR Number: 2.0****To:** Tyhee NWT Corp**From:** Tłıchǫ Government**Subject:** Caribou Baseline Information**Reference:** DAR 6.6.1.1**Preamble:**

The DAR only discusses impacts of a direct nature (ie. caribou being run over, habitat being built upon). No discussion is presented regarding indirect impacts, which all parties agree is the largest source of effects.

**Request:**

- 2.1) Please provide a summary of the cumulative effects of development, including effects from proposed and likely developments including Gahcho Kue, Fortune Minerals, the Denison Ice Road, and a possible all season road associated with the Fortune Minerals mine.

**IR Number: 3.0****To:** Tyhee NWT Corp**From:** Tłıchǫ Government**Subject:** Water Sampling Effort**Reference****Preamble:**

The Tłıchǫ Government is concerned that the proponent has not adequately characterized the water quality in the study area with samples across different seasons and years. A more rigorous sampling effort is needed for a better understanding of the baseline and minimizing uncertainty in the impact predictions.

**Request:**

- 3.1) Please indicate what season each water body sample was taken in, and whether the developer feels there is sufficient data for the predictions yet to be made.
- 3.2) Please clarify and discuss the seasonality and how many years of sampling has been conducted.

**IR Number: 4.0**

**To:** Tyhee NWT Corp

**From:** Tłıchǫ Government

**Subject:** Closure and Reclamation

**Reference:** DAR 11.2.5.2

**Preamble:**

Further clarification is needed regarding the post closure flow and quality of water.

**Request:**

- 4.1) Please provide a map and chart indicating the flow of water after closure operations have been completed.
- 4.2) Please provide an estimate of water quality for each of the contributing flows.
- 4.3) Please demonstrate the effect of failure of the passive treatment option on the net present value (ie. compute the present value of the costs incurred in the event of failure of the option) in order to illustrate that this mine is feasible if the water has to be treated forever.

**IR Number: 5.0****To:** Tyhee NWT Corp**From:** Tłıchǫ Government**Subject:** Closure and Reclamation – Pit Lake Water Quality and Fishery**Preamble:**

The 'closure plan' does not discuss the water quality of the pit lake that they are proposing (or if they intend to create a 'lake') or what the physical characteristics will be.

The company notes that the pit will be 'partially backfilled' without providing any indication as to what this means, why it is being done, or what criteria will be used in deciding if the backfilling should be undertaken.

**Request:**

- 5.1) Will the company consider active refilling? How long would passive refilling take?
- 5.2) What measures will be used to protect animals and human from entering into the area?
- 5.3) Provide clear and scientifically supported predictions on what the expected post closure pit water quality will be and explain how the water quality will affect the fishery.
- 5.4) How will the pit lake be integrated into the environment and what measures will be taken to create fish habitat when water quality is suitable.
- 5.5) Provide a discussion on the contingencies available if water quality does not meet expectations and perpetual care and treatment is required.
  - Please provide costs of perpetual care and treatment.
- 5.6) Provide a clear closure objective for partially refilling the pit with waste rock and what criteria will be used to determine the amount, the type, the size and the quality of material to be deposited.
- 5.7) Provide costing and rationale why the pit cannot be filled completely as opposed to partially backfilled.

**IR Number: 6.0****To:** Tyhee NWT Corp**From:** Tłıchǫ Government**Subject:** Water Treatment Options**Preamble:**

Throughout the document, the possibility of further water treatment options is discussed as potential adaptive management options.

**Request:**

- 6.1) Provide a thorough discussion on the water treatment options available and the pros and cons associated with each, including their ability to address different contaminants of concern.
- 6.2) What will cause the developer to move to another treatment option? Will there be agreed upon thresholds for triggering another treatment option?
- 6.3) In particular, if nutrient levels were found to exceed the water quality objectives, what treatment options are available?

**IR Number: 7.0**

**To:** Tyhee NWT Corp

**From:** Tłıchǫ Government

**Subject:** Cyanide

**Reference:** Site Wide Water Balance and Geochemistry Report; Section 4.3

**Preamble:**

The developer report they will be using cyanide.

**Request:**

7.1) Please indicate if the international cyanide code will be used in formulating management guidelines.