



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

***Preliminary Screening Comments***  
*for the*  
***Environmental Assessment***  
*of*  
***Tyhee NWT Corp's***  
***Yellowknife Gold Project***

September 12, 2008

**Mackenzie Valley Environmental Impact Review Board**

200 Scotia Centre

P.O. Box 938

Yellowknife, NT

X1A 2N7

Tel: (867) 766-7050

Fax: (867) 766-7074



Indian and Northern  
Affairs Canada

Affaires indiennes  
et du Nord Canada

Mackenzie Valley Land  
& Water Board

P.O. BOX 1500  
YELLOWKNIFE, NT X1A 2P1

File

AUG 23 2008

August 27, 2008

Application #MV2008D0018  
Assigned To JA/Bog

Mr. Jason Ash  
Regulatory Officer  
Mackenzie Valley Land and Water Board  
P.O. Box 2130  
Yellowknife, NT X1A 2P6

VIA FAX: (867) 873-6610

Dear Mr. Ash:

**RE: Application Review for both Land Use Permit (MV2008D0018) and Water Licence (MV2008L2-003) – Yellowknife Gold Project, Mining and Milling**

Thank you for your invitation to comment on Tyhee NWT Corp's land use permit (MV2008D0018) and water licence (MV2008L2-003) applications in support of the proposed Yellowknife Gold Project based near Giauque Lake, Northwest Territories. INAC is pleased to provide the attached comments derived from our initial review of the Project description, as requested by the Mackenzie Valley Land and Water Board on August 5, 2008.

Within the context of a sound regulatory regime in the Northwest Territories, INAC supports responsible economic development, while upholding Canada's responsibility to ensure that land and water are protected and to assist in ensuring that the Crown's Section 35 legal duty to consult with Aboriginal peoples is met.

INAC anticipates that the project will be referred to Environmental Assessment and does not have any objections to such a referral. It is INAC's understanding that Tyhee NWT Corp also anticipates such a referral. At this stage, INAC is not providing recommended Land-Use Permit Terms and Conditions for these applications.

If you have any questions or concerns about these comments, please do not hesitate to contact Lionel Marcinkoski in Environment and Conservation at (867) 669-2591, or myself at (867) 669-2647.

Sincerely,

David Livingstone  
Director, Renewable Resources and Environment Directorate

**INAC Comments on Land Use Permit (MV2008D0018) and Water Licence (MV2008L2-003) Applications – Yellowknife Gold Project, Mining and Milling**

**Environmental Concerns:**

The Water Resources Division of Indian and Northern Affairs has conducted a preliminary review of the Project Description Report for the Tyhee Yellowknife Gold Project (YGP). The purpose of this review was to broadly identify the main issues with the proposed project. The concerns are categorized into three main groups; water quality, the Tailings Containment Area (TCA), and the Closure and Reclamation Plan (CRP). The following is a list of general issues that are of concern:

**1. Water Quality:**

- Sampling indicates a potential for acid rock drainage (ARD) from the tailings. Details of how potential ARD will be monitored and addressed should be provided.
- The potential for ARD from the waste rock piles is also a concern. Details of how potential ARD from these piles will be monitored and addressed, particularly with regard to collection and seepage, should be provided.
- The location, volume, discharge routes, and inputs to the settling ponds at the Nicholas Lake Development have not been identified. Consequently, at this time, INAC is not able to evaluate the potential environmental impacts of this portion of the project.

**2. Tailings Containment Area (TCA):**

- A detailed Tailings Management Plan is required in order to adequately evaluate the potential environmental impacts and proposed mitigation and monitoring measures related to the tailings facility.
- The proposed dewatering of Winter Lake should be described in greater detail.
- Tyhee has estimated that approximately 12 million tonnes of tailings will be produced and proposes to deposit said tailings into a TCA with a capacity of 13.4 million tonnes. Potential impacts on the capacity of the TCA due to ice lens formation needs to be considered.
- The shallow depth of Winter Lake will likely influence the potential for ARD to develop in the tailings due to the presence of oxygen. This concern needs to be investigated further.
- The treatment and disposal of cyanide waste-product needs to be addressed in greater detail. In particular, it is not clear whether it will be separated from or combined with other tailings in the TCA.
- Annual discharges from the TCA into the receiving environment are not well discussed. Outstanding issues include, but are not limited to, when and where the discharge will occur, expected effects of the discharge, and monitoring for any impacts from the discharge.

**3. Closure and Reclamation Plan:**

- No Closure and Reclamation Plan (CRP) was submitted in the proposed project description and/or the application package and, as such, did not constitute part of this preliminary review. INAC recommends that Tyhee NWT Corp. refer to Indian and Northern Affairs Canada's *Mine Site Closure and Reclamation Guidelines (January 2007)* for information on recommended items to be included in a closure and reclamation plan. These guidelines are publicly available at [http://nwt-tno.inac-ainc.gc.ca/wrd-gl\\_e.htm](http://nwt-tno.inac-ainc.gc.ca/wrd-gl_e.htm).

Use of the Tailings Cap to Support Construction/Mining Activities:

INAC is concerned about Tyhee's proposed usage of the remediated Tailings Cap for the airstrip, site access and as a lay-down area to be used during construction. Although Tyhee has held discussions with the Contaminants and Remediation Directorate of INAC regarding *current* usage of the Tailings Cap to support exploration activities, Tyhee has yet to initiate discussions with CARD regarding the feasibility of using the Tailings Cap to support the *future* proposed activities. In anticipation of these discussions, INAC would like further detail on the size of equipment to be used on the Tailings Cap, expected usage, and evidence that the Tailings Cap could be used to support such activities without any detriment to the long-term integrity and safety of the cap. The environmental impacts related to potential damage to or failure of the tailings cap need to be assessed. Tyhee should provide this assessment and appropriate contingency-planning details for review.

Consultation with Aboriginal Groups:

INAC is monitoring the consultation occurring in the regulatory process to gather more information on what the possible adverse impacts of the project proposed by Tyhee NWT Corp. may have on established or potential Aboriginal and treaty rights. The anticipated environmental assessment process will provide important additional information as to the nature and scope of any potential adverse impacts, and therefore will be taken into account when a final assessment of Crown consultation is conducted.

At the time of this preliminary review, the record does not indicate that Tyhee NWT Corp. has had any substantive community meetings with potentially affected Aboriginal groups since the redesign of its project application. INAC recommends that Tyhee NWT Corp. provide more details on the community engagement and consultation it has done with potentially-affected Aboriginal groups with respect to its new project design.

Also, given that Tyhee's YGP is located in the Mowhi Gogha De Nutlee (traditional area of the Tlicho), Tyhee NWT Corp. does have a responsibility to consult with the Tlicho Government, as per clause 23.4.1 of the Tlicho Final Agreement. INAC would like Tyhee to provide information regarding their communications with the Tlicho Government.

INAC strongly encourages all potentially-affected Aboriginal groups to participate in the regulatory and environmental assessment processes to provide the Crown with information with respect to any possible adverse impacts that the proposed Yellowknife Gold Project may have on their established or potential Aboriginal and treaty rights.



Fish Habitat Management  
Suite 101, 5204-50<sup>th</sup> Avenue  
Yellowknife, Northwest Territories  
X1A 1E2

Gestion de l'Habitat du Poisson  
Suite 101 5204, 50<sup>e</sup> Avenue  
Yellowknife (Territoires du Nord-Ouest)  
X1A 1E2

Your file *Votre référence*  
MV2008D0018  
MV2008L2-0003  
Our file *Notre référence*

August 27<sup>th</sup>, 2008

Mackenzie Valley Land and Water Board  
c/o Jason Ash, Regulatory Officer  
PO Box 2130  
Yellowknife, NT X1A 2P6

Dear Mr. Ash:

**RE: Tyhee NWT Corp. Applications for Land Use Permit (MV2008D0018) and Water License (MV2008L2-0003), Yellowknife Gold Project, Ormsby and Nicholas Lake Properties, NT**

As requested in your correspondence dated August 5, 2008, the Department of Fisheries and Oceans (DFO) has reviewed the Land Use Permit (MV2008D0018) and Water License (MV2008L2-0003) applications submitted by Tyhee NWT Corp. to conduct gold mining operations on the Ormsby and Nicholas Lake Properties. DFO is providing the following comments as per section 125 of the MVRMA as they pertain to its authority under the habitat protection provisions of the Fisheries Act.

Based on the information provided in the Project Description and supporting Appendices, DFO is unable to fully evaluate the impacts of the proposed project on fish and fish habitat. Because of this uncertainty, and because the project proposes the use of a fish-bearing lake for a tailings impoundment area, DFO is of the opinion that the project, as presently described, has the potential for significant adverse impacts on the environment.

Please find below some of DFO's project specific concerns and additional information requirements:

**Winter Lake**

In the project description, Winter Lake has been identified by Tyhee NWT Corp. as the only feasible Tailings Containment Area (TCA) option. A preliminary evaluation and comparison of some of the other feasible TCA alternatives has been carried out, but a more rigorous alternatives assessment is required, including an evaluation of all other viable alternatives in combination with paste backfill of the underground workings. Since Winter Lake is a fish-bearing water body, the project would require an amendment to Schedule 2 of the Metal Mining Effluent Regulations (MMER) and a decision from Government in Council (GIC) prior to this or any fish-bearing lake being approved for tailings disposal. Tyhee received a joint letter from DFO and Environment Canada in December 2005 outlining some of the additional technical and site specific information requirements needed prior to the assessment and consideration of this option.

Furthermore, DFO will require detailed plans for the proposed engineered tailings dam, separating the southern and northern portion of Winter Lake, as well as the



methods anticipated for the draining of the northern portion to accommodate the boundaries of the open pit and for use as a potential effluent discharge site.

#### **Narrow Lake**

If Winter Lake is proposed as the TCA, the potential impacts of the project on Narrow Lake must be considered. These impacts include, but are not limited to, the potential impacts of TCA failure, effluent water quality monitoring and footprints of any infrastructure.

#### **Round Lake**

Round Lake was identified as one of the potential TCA alternatives. Due to its small storage capacity, the lake area was deemed to be too small to support the estimated volume of tailings produced throughout the life of the mine. However, Round Lake was considered to be a viable option as a secondary TCA should Winter Lake's capacity be insufficient. The adequacy of the shoreline and aquatic habitat assessment that was undertaken in July 2004 will have to be assessed if this is to be proposed as a tailings management option.

#### **Road Development**

Detailed fish and fish habitat assessments will be required for all potential watercourse crossing, including intermittent waterways which may provide access to important spring spawning habitats (i.e. wetlands). Crossing designs that minimize the impacts to fish and fish habitat will be required. Depending on the crossing design, road development has the potential to negatively impact fish and fish habitat by eliminating fish habitat, impeding fish passage, or adversely affecting water quality.

#### **Nicholas Lake**

The potential impacts of all proposed activities including water withdrawals on Nicholas Lake will need to be more thoroughly considered.

#### **Giauque Lake**

The project requires a projected annual freshwater withdrawal of 618,700 m<sup>3</sup> from Giauque Lake. Depending on timing, excessive amounts of water withdrawn from waterbodies or watercourses can lead to oxygen depletion, loss of over-wintering habitat and/or reductions in littoral habitat. Depending on the design, water intakes may cause losses of fish due to entrainment or impingement, and the required infrastructure (i.e. intake structures, docks) may lead to habitat losses. These potential impacts have not been described nor has mitigation been identified.

DFO appreciates the opportunity to provide comments on the above project. If you have any questions or wish to discuss any of the foregoing in detail, please contact Sarah Olivier at (867) 669-4919.

Sincerely,



Beverley Ross  
Regional Manager, Environmental Assessment for Major Projects  
Central and Arctic Region  
Fisheries and Oceans Canada

cc J. Dahl, Fisheries and Oceans Canada  
T. Gordanier, Fisheries and Oceans Canada  
G. Fillatre, Fisheries and Oceans Canada  
S. Majewski, Fisheries and Oceans Canada  
A. Wilson, Environment Canada  
L. Cimbalisty , Indian and Northern Affairs Canada  
G. Moore, Government of the Northwest Territories



August 27, 2008

Jason Ash  
Regulatory Officer  
Mackenzie Valley Land and Water Board  
P.O. Box 2130  
Yellowknife, NT X1A 2P6

Dear Mr. Ash:

**Tyhee NWT Corp., MV2008D0018 and MV2008L2-003  
Yellowknife Gold Project Water License and Land Use Permit Application  
Review**

The Department of Environment and Natural Resources (ENR) has reviewed the above noted project based on its mandated responsibilities under the *Environmental Protection Act*, the *Forest Management Act*, the *Forest Protection Act* and the *Wildlife Act* and provides the following comments and recommendations for consideration by the Board.

Comments and recommendations were provided by ENR technical experts in the Environment Division, Forest Management Division, Wildlife Division and the North Slave Region, and were coordinated and collated by the Environmental Assessment and Monitoring Section (EAM). Should you have any questions or concerns please do not hesitate to contact Joel Holder, Environmental Assessment Analyst, at (867) 920-6593.

Sincerely

Joel M. Holder  
Environmental Assessment Analyst  
Environmental Assessment and Monitoring  
Environment and Natural Resources



**Attachment:**

- Safety in Grizzly and Black Bear Country

**Wildlife Disturbance**

Proper wildlife management is necessary to ensure the protection of wildlife, key habitat and field personnel. Although development proposals vary in purpose and size in the NWT, similar principles apply when it comes to wildlife management.

**Project Specific Concerns and Context:**

1. In previous correspondence with the MVLWB regarding the YGP proposed by this Proponent (letter to Ms. Plautz from ENR dated April 22, 2005), ENR requested to have Plans in place prior to commencement of the project that address wildlife safety and management. In the current applications, the necessity of these plans remains, as ongoing wildlife management and safety issues have not been addressed.
2. The Proponent refers to census information regarding Barren Ground Caribou, which may occur in the project area. However, the report lacks current information and should include census data from the 2006 Bathurst caribou photocensus.
3. In addition to lacking the most recent data, ENR-Wildlife division technical reviewers have concerns regarding the wildlife safety in the context of the tailings pond as described by the Proponent. The Report indicates that the tailings from the project will be stored sub-aqueously in Winter Lake. There is no indication of how wildlife (such as caribou and moose) will be excluded from the tailings pond.
4. Issues related to the barren ground caribou migrations through the project area are not addressed in the project description, or in the applications under review. The Proponent acknowledges the importance of the project area to migrating caribou, however there is no information indicating how the Proponent will accommodate migrating caribou. As an example, the Proponent does not indicate that the airstrip will have an effect on wildlife, however, caribou traffic on airstrips is a common occurrence for development projects in the NWT. All major projects have plans in place that describe how staff will react to wildlife on airstrips.
5. ENR continues to be concerned about the cumulative effects of development in regards to wildlife and habitat in the NWT. In addition to the use of Winter Lake as a tailings pond, the Proponent indicates that the eskers in the vicinity of the proposed project will be used in part for road building materials. In the Report the Proponent states that 75,000-100,000 tonnes of sand and gravel, some of which will originate from the eskers, will be used for road building. The esker surveys completed over the course of 4 days (3 days of ground surveys, 1 aerial survey) by the Proponent in 2005 indicated that though there was evidence of use by black bear, fox and wolf, on both eskers, only one abandoned fox den was located on one esker. The Proponent indicates that, based on the survey results, the eskers are not important habitat in this area. If the Proponent proceeds with the removal of materials from eskers for building of infrastructure, ENR would like to point out that the potential for denning habitat is essentially lost for time indeterminate.

### **Recommended Conditions:**

- The Proponent should include census data from the 2006 Bathurst caribou photocensus to determine numbers of Barren Ground Caribou, which may occur in the project area.
- ENR recommends that Winter Lake be fenced to exclude wildlife, and that prior to commencement of the development, the Proponent should, in collaboration with GNWT-ENR staff, draft a Wildlife Protection Plan (WPP) that will address this issue, as well as wildlife safety issues in general as they relate to this development.
- ENR strongly recommends that the MVLWB request that, in addition to the WPP, the Proponent work in collaboration with ENR wildlife staff to draft a Wildlife Management Plan (WMP) that addresses issues.
- ENR recommends that the Proponent undertake a new esker survey to ensure they have an updated inventory of wildlife use prior to removal of any materials.

### **Food Management and Camp Layout/Design**

Proper camp design and layout of the camp will prevent wildlife attraction. Forethought in the layout of the camp can be instrumental in minimizing the attraction of wildlife and preventing serious wildlife interactions and related property damage.

### **Project Specific Concerns and Context:**

1. The Proponent has not demonstrated how the design and layout of the camp will prevent wildlife attraction by reviewing the *Safety in Grizzly and Black Bear Country: A Reference Manual*.  
<http://www.nwtwildlife.com/Publications/safetyinbearcountry/safety.htm>
2. The Proponent has not identified appropriate mitigative measures to prevent attraction of wildlife over both the short- and long-term.
3. Wildlife Monitors can minimize encounters with wildlife and local harvesting areas can be avoided. Wildlife monitors should be assigned during construction. Monitors should be hired from local communities, whenever practical.

### **Recommended Condition:**

The Proponent shall develop camp layout and food handling and storage procedures, to be approved by the Regulatory Authority at least 60 days prior to the commencement of construction and operations, which will be provided to all relevant project personnel (including environmental monitors, operators and contractors) for reference and use, which shall include, at minimum:

- The installation of an electric fence (designed for deterring bears and other carnivores) around the kitchen, food/waste storage areas and the incinerator.
- Layout of the camp in the manner discussed in *Safety in Grizzly and Black Bear Country* (attached).
- The removal of all food (including canned and dried goods) if the camp will be vacant for more than 2 weeks.

## **Waste Management**

Proper waste management at camps is important to ensure the health and safety of personnel, wildlife, and the environment. Although camps vary in purpose and size in the NWT, similar principles apply when it comes to waste management. Thorough and diligent waste management planning is required. Environmental Protection Website lists numerous guideline documents. Proponents should review and adhere to all of these documents prior to conduction of operations. <http://www.enr.gov.nt.ca/eps/leg.htm>

### **Project Specific Concerns and Context:**

1. A Waste Management Plan has not been provided, which will identify the mitigative measures that will be used for storage, treatment, transportation and disposal for waste. ENR has staff available to provide guidance with regards to development and implementation of this plan.
2. ENR is concerned about toxic emissions from incineration and the potential for these toxins to bio-accumulate in the environment. The Proponent has not provided sufficient details with regards to alternative waste disposal options, incinerator technology or type, incineration management strategies, or the composition of waste to be incinerated. The type of incineration technology and the management practices employed can greatly affect the amount of contaminants released to the environment, the attraction of carnivores and risk of forest fires.

If incineration is chosen as the preferred waste disposal method, the device selected should be capable of meeting the Canada-wide Standards (CWS) for Dioxins and Furans and the CWS for Mercury Emissions. This can typically be achieved with the use of an incinerator that uses dual chamber and controlled-air technology. However, it is important to note that installation of a technologically advanced incinerator alone is not sufficient to ensure compliance with the CWS. It is critical that the technology be combined with a comprehensive waste management strategy (especially waste segregation), operator training and diligent operation and maintenance.

3. The Proponent has not adequately demonstrated that its' food and waste management strategies are appropriate for a camp of this size and duration.
4. The Proponent has not identified appropriate mitigative measures to prevent attraction of wildlife over both the short- and long-term.
5. The Proponent has not provided enough information on purchasing policies and waste segregation, or related plans to reduce the waste stream (i.e. using non-disposable kitchenware; management of hazardous wastes, including used batteries or other dangerous goods; etc.).
6. The Proponent states, "*waste oil will be burned in a waste oil burner.*" The burning of used oil as fuel is only acceptable if it is in an approved used oil

burner and the used oil has been tested for acceptable levels of contaminants as required in the NWT *Used Oil and Waste Fuel Management Regulations*.

7. The Proponent is proposing, *“Non-hazardous waste such as food waste, paper and other combustible non-hazardous material will be incinerated on site in an area and in a manner designed for the purpose.”* The amount of information provided in the application is found to be insufficient in order to provide recommendations or comments.

**Recommended Condition:**

The Proponent shall submit a Waste Management Plan, to be approved by the regulatory authority at least 60 days prior to the commencement of operations, which will be provided to all relevant project personnel (including environmental monitors, operators and contractors) for reference and use, and shall include, at minimum:

- The identification of mitigative measures for waste storage, treatment and transport to minimize wildlife attraction, including the storage of odorous waste in sealed (bear-proof), odour-free containers.
- The installation of a grease trap on grey water outlets and the addition of lime and pit covers (i.e. sand) every second day.
- Consideration of alternatives to pit privies for sewage management and/or the careful evaluation of the design and location of the pit privies.
- Options for the disposal of food (organic) and solid waste, including the use of regular flights for transport of waste off-site. If incineration is chosen as the preferred disposal method for garbage and camp waste, the Permittee shall incorporate the following minimum incineration management strategies into the Waste Management Plan:
  - A description of the waste streams intended for incineration;
  - A description of recycling and waste segregation plans that control the amount of waste entering the incinerator;
  - The use of trained and designated operators and a description of their training and qualifications;
  - The incineration model and type to be used at the project site and rationale for this selection; and
  - Incineration residual disposal procedures.
  - Consultation with communities prior to disposing of waste in community solid waste facilities, including ensuring that:
    - The community and/or facility has been consulted and has consented to the use of its infrastructure for disposal of the waste types and quantities in question; and
    - The receiving community and/or facility has the appropriate Land Use Permit, Water License and/or bylaws in place that allow for the disposal of this outsourced waste.

**Environmental Protection**

An adequate Spill Contingency Plan contains valuable information to assist in the proper storage and of fuels, safe handling of any spilled product. The plan should identify and show that the Proponent has planned for and is prepared with acceptable prevention, remedial measures and equipment, including proper planning

for contingencies, including response and clean up of spills, and is familiar with the available disposal alternatives for contaminated materials recovered in the event of a spill. Please see the Environment and Natural Resources Regulation on Spill Contingency Planning and Reporting Regulations at <http://www.enr.gov.nt.ca/eps/pdf/spillreg90.pdf>

**Project Specific Concerns and Context:**

1. A Spill Contingency Plan which includes measures that minimize the release of contaminants and mitigate potential spills, including the establishment of designated fuel storage, refueling areas and adhere to the *Spill Contingency and Reporting Regulations* of the *Environmental Protection Act* has not been provided.

**Recommended Condition:**

The Proponent shall develop a Spill Contingency Plan that enacts measures that minimize the release of contaminants and mitigate potential spills, including the establishment of designated fuel storage and refuelling areas that are:

- At a distance greater than 100 meters from any local high water mark.
- Not located in a drainage channel.
- At a location that avoids steep grades from waterbodies.

**Forest Management**

Forest authorizations may be required by the proponent to conduct their activities. If the Proponent is planning to harvest timber, a Forest Management Authorization will be required, as per the *Forest Management Act* and *Regulations*. The Act prohibits anyone from cutting, using or transporting timber, or damaging standing timber unless:

- Authorized with a Timber Permit
- Authorized by license
- Exempted from holding a permit or license.

In order to comply with the *Forest Protection Act* (Section 10 and 19(1)), the Proponent should adhere to the [Forest Fire Prevention and Suppression Guidelines](http://forestmanagement.enr.gov.nt.ca/fire_management/fire_docs/guidelines_for_forest_fire_prevention_and_suppression.pdf). The intent of the Guidelines is threefold. First, industrial operations must be conducted so that they do not contribute to seasonal fires and fire load. Second, industrial operations must be able to control and extinguish any fires that occur as a result of their operations. Finally, industrial operations must be able to respond to wildfires that may affect human life and the property of their operations.

[http://forestmanagement.enr.gov.nt.ca/fire\\_management/fire\\_docs/guidelines\\_for\\_forest\\_fire\\_prevention\\_and\\_suppression.pdf](http://forestmanagement.enr.gov.nt.ca/fire_management/fire_docs/guidelines_for_forest_fire_prevention_and_suppression.pdf)

**ENR Review Summary:**

ENR recommends that the MVLWB require the proponent to create, in consultation with ENR, a detailed Wildlife Management Plan, a Wildlife Protection Plan, a Waste Management Plan, a Spill Contingency Plan and provide details on camp design and procedures with regards to food handling and storage. These plans should be

approved by the MVLWB at least 60 days prior the granting of any authorizations, which will be provided to all relevant project personnel for reference and use.



**Yellowknives Dene First Nation**

P.O. Box 2514  
Yellowknife, NT X1A 2P8

Dettah  
Telephone: (867) 873-4307  
Facsimile: (867) 873-5969

Ndilo  
Telephone: (867) 873-8951  
Facsimile: (867) 873-8545

August 12<sup>th</sup>, 2008

Jason Ash  
Mackenzie Valley Land and Water Board  
Box 2130  
Yellowknife, Northwest Territories  
X1A 2P6  
P: (867) 669-0506  
F: (867) 873-6610  
[Jason@mvlwb.com](mailto:Jason@mvlwb.com)

Mackenzie Valley Land  
& Water Board

File \_\_\_\_\_

AUG 12 2008  
MV2008D0018  
Application # MV2008L2-0003  
Copied To JARig

Dear Mr. Ash:

**RE: Tyhee's Yellowknife Gold Project (MV2008D0018, MV2008L2-03)**

In response to the application submitted by Tyhee NWT Gold Corp. the Yellowknives Dene First Nation (YKDFN) conducted an internal review.

Because of the size and complexity of the proposal, it has not been possible to thoroughly review the application in the allotted time, but in the review that was possible, it became clear that this is a very complex project with significant potential environmental effects. It goes without saying that this causes significant concerns within the YKDFN, especially in regard to the proposed tailings disposal.

Because of the size and complexity coupled with the potential impacts and serious community concerns, this project should without question be referred to environmental assessment.

If you have any questions or concerns please contact the Lands and Environment Office.

Yours truly,

Rachel Crapeau  
A/Director of Lands

C: Chief Edward Sangris, YKDFN (Dettah) – Fax: (867) 873-5969  
Chief Fred Sagnis, YKDFN (Ndilo) – Fax: (867) 873-8545  
Steve Ellis, Akaitcho IMA Office – Fax: (867) 370-3209



201-24

August 27, 2008

Jason Ash  
Regulatory Officer  
Mackenzie Valley Land and Water Board  
PO Box 2130  
YELLOWKNIFE, NT X1A 2P6

By Email: [permits@mvlwb.com](mailto:permits@mvlwb.com)

**Re: Land Use Permit Application MV2008D0018 – Yellowknife Gold Project**

We have reviewed the Project Description Report submitted by Tyhee NWT Corp. in support of land use permit application MV2008D0018 for the Yellowknife Gold Project. We have also conducted detailed reviews of the archaeological assessment reports – included in Appendix F of the project description report – prepared by Points West Heritage Consulting Ltd. for the project. We recommend that the project proponents implement all of the heritage resource management recommendations identified by their consulting archaeologist in the report entitled “Yellowknife Gold Project 2005 Archaeological Investigations Final Report.” As indicated in this report, we note that further archaeological assessment may be required as the final footprint of the project is refined, and the locations of ancillary developments are determined over the life of the project.

Archaeologists at the Prince of Wales Northern Heritage Centre (PWNHC) are available to discuss the scope of further archaeological assessments with the proponent’s consulting archaeologist as required.

Sincerely,

Glen MacKay  
Assessment Archaeologist  
Prince of Wales Northern Heritage Centre

## Rhonda Miller

---

**From:** George Patterson [George\_Patterson@gov.nt.ca]  
**Sent:** Wednesday, August 20, 2008 9:03 AM  
**To:** permits@mvlwb.com  
**Subject:** LUP MV2008D0018 and water licence MV2008L2-0003

Hi,

The DOT would like to submit that we have no concerns regarding the above-noted at this time.

Thanks,

George Patterson  
Environmental Analyst Intern  
Policy, Planning, and Environment  
Dept. of Transportation, GNWT  
Ph. 867 920 3443  
Fax 867 920 2565