

GENERAL INSTRUCTIONS FOR EXCEL TEMPLATE:

1. Do not leave blank rows above or between comments.
2. Do not modify or delete the instructions or the column headings (i.e. the grey areas).
3. Each comment must have an associated topic and recommendation.
4. All formatting (i.e. bullets) will be lost when this file is uploaded to the Online Comment Table.
5. If necessary, adjust the cell width and height in order to view all text.
6. Cutting and pasting comments from WORD documents cannot include hard returns (spaces between paragraphs).
7. If you would like to create paragraphs within a single cell, please use a proper carriage return (ALT & ENTER).

<u>TOPIC</u> <i>Be as specific as you think is appropriate; for example a section or page of the document, a recommendation #, general comment, etc.</i>	<u>COMMENT</u> <i>Comments should contain all the information needed for the proponent and the Board to understand the rationale for the accompanying recommendation.</i>	<u>RECOMMENDATION</u> <i>Recommendations can be for the proponent or for the Board. Recommendations should be as specific as possible, relating the issues raised in the "comment" column to an action that you believe is necessary.</i>
Annual Work Plan--Cover Letter (pg. 1), Application (s. 5 on pg. 1), Exploration Overview (pg. 3)	The application is to cover exploration activities anywhere in the mineral claims block which is a very large area, for a five year period. Although DDEC has committed to "submit a notice of commencement of work to the AANDC Land Use Inspector...which will include a brief summary of the activities that will completed and a plan showing the location of any winter roads, areas of drilling or other related activities" it is unclear whether summer activities will be covered and how the land use activities conducted over the course of the year may be reported.	DDEC should clarify whether the land use permit will cover any activities that may take place outside of the winter season. The WLWB should include a condition in the land use permit that will require the submission of an annual work plan for review and approval. The work plan should contain information to ensure that there is sufficient detail and maps to understand what land use activities will be carried out including a general schedule, the equipment to be used, areas that will be used including appropriate calculations of land use fees, site-specific mitigation measures, other relevant information and a short description of the previous year's activities with maps and photos as appropriate. There should be sufficient time for review and approval of the annual work plan so it should be submitted 60 days before the commencement of any work. Any significant amendments to a work plan necessary to accommodate work in the field, should be subject to WLWB and/or the Inspector's approval.

<p>Equipment to be Used--Application (s. 5 on pg. 1 and s. 10 on pg. 2)</p>	<p>The summary of the operations discusses reverse circulation and sonic drilling for winter 2014 or 2015 at Jay, Cardinal and Lynx. Lynx is not indicated as a land use area in the "Work Location Map" following the application. The list of equipment provided in s. 10 of the application does not appear to include reverse circulation or sonic drilling equipment.</p>	<p>DDEC should clarify whether reverse circulation and/or sonic drilling will take place in 2014 or 2015 and provide a list of appropriate equipment to be used. Alternatively, if the WLWB adopts the approach recommended above, for an annual work plan, then DDEC can provide greater detail on annual basis as to what land use activities it intends to carry out.</p>
<p>Land Use Fee Calculation--Application (s. 18, pg. 3)</p>	<p>It is not clear how the figure of 12 hectares was calculated for the determination of the land use fees. The areas shown in the "August 2013 Exploration Permit" map appears to exceed 12 hectares. It is also not clear how future land use fees will be calculated or whether this will be done on an annual basis.</p>	<p>DDEC should provide the calculations to show how the figure of 12 hectares was arrived at. An Annual Work Plan requirement in the permit would assist with the calculation and reconciliation of land use fees as suggested above.</p>
<p>Impact of Airborne Geophysical Surveys--Exploration Overview (s.3.2, pg. 6 and s. 4.7, pg. 12)</p>	<p>DDEC states that "Land use permits are not normally required for airborne surveys" but describes this work as "flown by either fixed-wing or helicopter at elevations of about 30 to 60 metres on flight lines as close as 50 metres apart." Mitigation measures are described as "any large caribou herds or other large mammals will be avoided" and "GNWT-ENR 2007 Low Flying Guidelines will be followed when possible". It is not clear when the surveys will be flown, what defines a "large" group of animals, what is meant by "avoidance" or when the GNWT Low Flying Guidelines will be followed or not.</p>	<p>DDEC should indicate when the airborne geophysical surveys will be conducted and avoid periods when there are caribou in the target areas. DDEC should define what is meant by a "large" group of animals, what is meant by "avoidance" and state when the GNWT Low Flying Guidelines will be followed or not.</p>
<p>Reverse Circulation Drilling Additives--Environmental Operating Procedures for Exploration (s. 4-11, p. 14)</p>	<p>To assist in mitigating impacts of reverse drilling, "non-toxic and biodegradable drilling additives" will be used. It would be important for regulators to know what these additives are in the event of an accidental release of drilling fluids to the environment. The application does not contain a list of the additives that will be used.</p>	<p>DDEC should provide MSDS sheets to the WLWB and the Inspector for additives to be used during reverse circulation drilling, and ensure this information is kept at the actual drill sites.</p>
<p>Archaeological Resources--Environmental Operating Procedures for Exploration (s. 3.2, pg. 4)</p>	<p>DDEC states that "surveys may be required to identify sites of sacred, heritage and cultural significance" but does not indicate when this work will be done.</p>	<p>DDEC should indicate whether there have been archaeological surveys conducted in the vicinity of the proposed land use activities for the winter of 2014 and for future exploration activities on an annual basis as suggested above.</p>