

Closure and Reclamation Plan for the Confirmation and Exploration Program Pine Point District, Northwest Territories



Purpose

This document is provided in support of the Mackenzie Valley Land and Water Board (MVLWB) Type A Land Use Permit and Type A Water Licence Application for the Pine Point Mining Limited Confirmation and Exploration Program. The intent of this document is to describe how this environmental management and monitoring plan relates to the Project and to list applicable guidelines and standards. It was developed with the available Project information. This document is not intended for approval but is provided for review purposes and will be further developed and refined as the regulatory process proceeds.

Version History

Pine Point Mining Limited is responsible for the distribution, maintenance, and updating of this document. Changes that do not affect the intent of the document will be made as required (e.g., phone numbers, names of individuals). The table below indicates the version of this document, and a summary of revisions made.

Revision #	Section(s) Revised	Description of Revision	Issue Date
0	-	Version for Type A Water Licence and Type A Land Use Permit Applications for the Confirmation and Exploration Program	23 November 2020



Table of Contents

1.0	PLAIN L	ANGUAGE SUMMARY	1
2.0	INTROD		1
	2.1	Purpose and Scope	1
	2.2	Closure Goal and Principles	1
	2.3	Project Team	2
	2.4	Engagement	2
	2.5	Regulatory Instruments for Closure and Reclamation	2
3.0	ENVIRO	NMENTAL SETTING	3
4.0	HISTORY	OF MINING AT PINE POINT	3
5.0	PROJECT	DESCRIPTION	7
	5.1	Location and Access	7
	5.2	Proposed Activities	7
	5.3	Drilling	7
	5.4	Metallurgical Sampling	8
	5.5	Groundwater Testing	8
	5.6	Accommodations and Facilities	8
	5.7	Areas Affected by Other Project Activities	9
6.0	PERMAN	NENT CLOSURE AND RECLAMATION	9
	6.1	Definition	9
	6.2	Access Trails	9
	6.3	Drilling1	0
	6.4	Metallurgical Bedrock Sampling1	0
	6.5	Groundwater Testing	0
	6.6	Accommodations and Other Camp Facilities	0
	6.7	Unauthorized Discharges 1	1
	6.8	Uncertainties and Contingencies	1
	6.9	Climate Change Considerations	1
	6.10	Integrated Schedule of Activities	1
	6.11	Post-Closure Site Assessment	1
	6.12	Financial Security	2



7.0	REFERENCES	.14
LIST	DF TABLES	
Table	1: Federal and Territorial Acts and Regulations Relevant to Closure and Reclamation	2
Table	2: Uncertainties Associated with Closure Activities	11
Table	3: Summary of Closure Costs from RECLAIM Model	13

LIST OF FIGURES

Figure 1: Location of the Pine Point Project	5
Figure 2: Pine Point Project Boundary, Mining Lease Areas, and Existing Disturbances	6



Abbreviations, Definitions and Units of Measure

Abbreviation	Definition		
Cominco	Cominco Ltd.		
CRP	Closure and Reclamation Plan		
ICRP	Interim Closure and Reclamation Plan		
NTPC	Northwest Territories Power Corporation		
NWT	Northwest Territories		
PPML	Pine Point Mining Limited		
Project	Pine Point Project		
WRSF	waste rock storage facility		
ZnEq	zinc equivalent		

Units of Measure

Unit of Measure	Definition
%	percent
km	kilometre
ha	hectare
Mt	million tonnes
tpd	tonnes per day



1.0 Plain Language Summary

This Closure and Reclamation Plan for the Pine Point Project describes how Pine Point Mining Ltd. will close operations, remove all equipment and reclaim disturbed areas at the end of the Confirmation and Exploration Program. Pine Point Mining Ltd. hopes to develop a mine at Pine Point, in which case the Closure and Reclamation Plan for the mine would supersede this document. This document also describes the proponent, the closure goals and principles, engagement regarding closure planning, the regulatory process for closure, the existing environment at Pine Point, provides a summary of the proposed closure methods.

2.0 Introduction

Pine Point Mining Limited (PPML) is the sole proponent for the Pine Point Project (Project) and is a wholly owned subsidiary of Osisko Metals Incorporated. PPML is investigating the historical Pine Point Mine area with the objective of recommencing mining of lead and zinc deposits in the area (Figure 1). A Confirmation and Exploration Program is proposed at the Pine Point property, requiring a Type A Land Use Permit and Water Licence. These applications include all the activities currently permitted under Mackenzie Valley Land and Water Board (MVLWB) and will replace Land Use Permits (LUP) MV2017C0024 and MV2018C0005 and Water Licence MV2020L2-0008 (previously MV2018L2-0003). This Closure and Reclamation Plan (CRP) supports these Confirmation and Exploration Program authorization applications.

2.1 Purpose and Scope

This CRP describes the conceptual plan for temporary or permanent closure of the Project. The general purpose of this CRP is to demonstrate the satisfactory closure and reclamation. This CRP details closure plans for the Project only and does not include activities or monitoring associated with historical mining activities at or near the Project, outside of developments directly associated with the Project.

2.2 Closure Goal and Principles

The closure goal for the Project is similar to that proposed in the Closure Guidelines (MVLWB and AANDC 2013) and comprises two parts to reflect the historical disturbance that has already been experienced by the site:

"For previously undisturbed areas, the goal is to return the affected areas of the site developed by the Project to viable and, wherever practicable, self-sustaining ecosystems that are compatible with a healthy environment and human activities. Where areas of the Project have been previously disturbed through historical mining activities, the goal is to return the areas of the site affected by the Project to at least an equivalent environmental state that they were left by the Government of Canada prior to the Project."

Closure principles for the areas developed by the Project are reflective of the Closure Guidelines and include:

- The site is physically and chemically stable.
- No long-term active care is required.
- Closure will consider future land use.



2.3 Project Team

PPML is a 100% owned subsidiary to Osisko Metals Incorporated. The PPML Environmental Manager will ultimately be responsible for the success of the CRP during construction and operations and will approve relevant policies and documents, auditing, action planning, and the verification process. The PPML Environmental Manager will be responsible for the implementation of the CRP including overall management of the plan, internal reporting, compliance and adaptive management. Other relevant personnel will also be responsible for the effectiveness of the CRP through completing required training, supporting implementation and remaining compliant with the CRP, as appropriate to their roles, as set out by the CRP.

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2.4 Engagement

The CRP will be refined based on engagement conducted throughout exploration and future CRPs will continue to be influenced and guided by engagement with parties. See also the Project Engagement Plan.

2.5 Regulatory Instruments for Closure and Reclamation

Closure of the Project may be subject to the federal and territorial legislation outlined in Table 1.

Table 1: Federal and	Territorial Acts and	d Regulations	Relevant to	Closure and	Reclamation
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Federal	Territorial		
 Fisheries Act Arctic Waters Pollution Prevention Act and Regulations Mackenzie Valley Resource Management Act and Regulations Canadian Environmental Protection Act, 1999 and Regulations Canadian Navigable Waters Act Explosives Act and Regulations Transportation of Dangerous Goods Act and Regulations Canada Wildlife Act Species at Risk Act 	 Commissioner's Lands Act and Regulations Environmental Protection Act and Regulations Environmental Rights Act and Regulations Waters Act and Regulations Northwest Territories Lands Act and Regulations Safety Act and Regulations Mine Health and Safety Act and Regulations Scientists Act and Regulations Archaeological Sites Act and Regulations Wildlife Act Explosives Use Act and Regulations Species at Risk (NWT) Act 		



The CRP framework has been developed in consideration of applicable territorial guidelines, including:

- Guidelines for the Closure and Reclamation of Advanced Mineral Exploration and Mine Sites in the Northwest Territories (MVLWB and AANDC 2013)
- Northern Land Use Guidelines: Camp and Support Facilities (GNWT-Lands 2015a)
- Northern Land Use Guidelines: Access Roads and Trails (GNWT-Lands 2015b)
- Northern Land Use Guidelines: Pits & Quarries (GNWT-Lands 2015c)

3.0 Environmental Setting

The Project is a brownfield exploration program located on the historical Cominco Ltd. Pine Point Mine site, which was in operation from 1964 to 1988. The closest major transportation hubs are Yellowknife and Hay River. Access to the Project is presently via all weather Highways 5 and 6. On-site access is primarily via existing roads and trails that can be accessed from the public highway. Further details are provided in the Project Description (PPML Confirmation and Exploration Program Project Description).

The Project is located within the Taiga Plains Mid-Boreal ecoregion (ECG 2009). Topography is gently undulating with three major hill systems (Cameron Hills, Trout Upland, and Horn Plateau). Characterization of the environment in this ecoregion includes a cold boreal climate (mean annual temperature -2.0°C to 5.5°C) (ECG 2009). Conditions are wet (mean annual precipitation 310 to 410 mm) in low-lying poorly drained areas which retard organic matter decomposition. Peatlands of varying thickness occur over extensive areas as patterned and horizontal fens, treed bogs, and peat plateaus (the latter on permanently frozen organic soils) (ECG 2009). On better-drained upland sites, the interplay of parent materials and active processes such as fire and alluvial deposition results in a mix of deciduous, mixed-wood, and coniferous forests (ECG 2009). Broad scale vegetation includes mixed-wood, deciduous, and peat plateaus (complexes of open, stunted black spruce – lichen forest and wet sedge – moss dominated collapse scars) are common (ECG 2009).

4.0 History of Mining at Pine Point

The Pine Point District contains approximately 100 known zinc and lead deposits, distributed along three trends which extend in aggregate along approximately 65 km of strike and 7 km of width. Historic exploration work has been conducted throughout the District since active prospecting began in 1900. Since the 1960's, prospecting has consisted predominantly of geophysical surveying and diamond drilling. Previous mining and exploration activities were undertaken in the area by Teck/Cominco. Teck/Cominco ceased mining and milling operations in 1987. Pine Point Mines Ltd. (Cominco) mined 52 of these deposits from 1964 to 1988 extracting 64 million tonnes of ore, two of which were mined underground and the remaining 50 were mined as open pits. The mined deposits lie along a 35 km trend and included a mill and a full town site at Pine Point which were removed at the end of mining (Figure 2).



The area east of the Buffalo River is predominantly a brownfield site. The open pits remain and in many cases the pits have naturally filled with water (a combination of groundwater and surface water). Adjacent to the open pits are waste rock dumps (predominantly dolomite, a form of limestone). Each of the open pit sites were accessed by roads constructed with a crushed dolomite surface and which connect back to the central processing plant and the former townsite of Pine Point. The tailings management facility adjacent to the former processing plant is subject to a current Water Licence and Land Use Permit held by Teck Metals Ltd. (MV2017L2-0007 and MV2019X0006). Historic access for exploration in the area has been extensive, consisting of bulldozed and hand cut lines extending throughout the region (Figure 2). The extent of the previous activity can be viewed in air photo imagery (e.g., Google Earth, Bing Maps).







25mm IF THIS MEASUREMENT DOES NOT MATCH WHAT IS SHOWN, THE SHEET SIZE HAS BEEN MODIFIE



5.0 Project Description

5.1 Location and Access

Pine Point Mining Limited (PPML) is the sole proponent for the Pine Point Project (Project) and is a wholly owned subsidiary of Osisko Metals Incorporated. The Pine Point District contains approximately 100 known zinc and lead deposits, distributed along three trends, which extend in aggregate along 65 km of strike and 7 km of width. The Project is located on a brownfield site resulting from the historical Pine Point Mine in the Northwest Territories (NWT) within the South Slave Mining District, south of Great Slave Lake, approximately 175 km directly south of Yellowknife, 75 km east of Hay River, and 53 km southwest of Fort Resolution. The closest major transportation hubs are Edmonton, Yellowknife, and Hay River. Access to the Project is presently via all-weather Highways 5 and 6 (Figure 1).

5.2 Proposed Activities

The recent completion of a NI 43-101 Technical Report Preliminary Economic Assessment (PEA) concluded that the project has technical and financial merit and was sufficient to make the decision to advance to a feasibility study. The PEA recommended the following:

- additional work to advance the discovery of new deposits
- increase the existing mineral resources by conducting further delineation drilling
- conduct additional studies, sampling and test work for engineering design
- metallurgical testing
- groundwater testing

Based on the recommendations from the PEA, a Confirmation and Exploration Program is proposed that will collect samples and provide information as recommended by the PEA. The information will be used to support a feasibility study and for detailed engineering design of mining and processing, including infrastructure requirements needed for the construction and operation of a mine. The work is expected to be ongoing as input requirements to the design and engineering are further refined. Further details of the proposed work is provided in the Project Description.

PPML has 40 mineral leases, 106 mineral claims, and 4 surface leases for a total area of 46,473 hectares (ha). Ongoing work to test exploration targets for the presence of mineralization will consist of normal prospecting activities including, for example, geological mapping, prospecting, soil and rock sampling, airborne and ground geophysics, diamond core drilling, geological logging and sampling of core, and may include pitting to acquire samples.

5.3 Drilling

Exploration targets interpreted from these data will be used to target diamond drilling and small pitting to determine if mineralization is present. It is anticipated that the targets can be closely accessed via existing trails and lines from which access trail extensions will be cleared to the target site.



The drill core and other samples will be processed in the geological core shed on site and may include core cutting and small-scale crushing and screening prior to shipment to an off-site laboratory. Core and other material not shipped offsite will be stored onsite as required. The work is expected to be carried out more or less continuously throughout the year.

Methods of accessing, preparing, and reclaiming the core drilling sites, water and diesel resupply, and drill cuttings disposal are described in the Confirmation and Exploration Program Project Description Section 6.0.

5.4 Metallurgical Sampling

Sampling of mineralised bedrock is required to understand the future operational blasting parameters and to obtain samples for comminution (crushing/grinding) testing. A sample for comminution testing of approximately 5 tonnes is required from each of up to twenty separate sites. This sample will be obtained by passing blasted bedrock material over a sizing screen. The retained fraction will be placed in 1 m³ sample bags to transport off-site to a testing facility. To produce the required 5 tonnes of sample, it is expected that the total amount of blasted material will need to be 10 to 30 tonnes per site. At each site, multiple blasts may be undertaken to obtain information on the blasting parameters for future operational requirements. Further information is provided in the Project Description for the Confirmation and Exploration Program.

5.5 Groundwater Testing

The purpose of the groundwater testing is to obtain values for hydrogeological parameters that will enable quantitative models of groundwater movement to be developed and flow rates for the aquifers to be determined. This information will be used in the development of the water management plan for the Pine Point Project. Up to 10 different potential mining resource areas will be investigated for the purposes of understanding and predicting the efforts needed to manage water during future mining operations.

There are two methods proposed for the groundwater testing depending on where the testing is located. The first test method involves pumping pit water from an existing open pit to another pit sufficiently far away that it will not interfere with the source pit groundwater. This will provide the rate at which the source pit water levels recover through groundwater recharge and the rate at which water levels in the destination pit return to the pre-pumping levels. The second type of test will use boreholes installed near a mineral deposit to draw down the water table in the location of that deposit and then move the water into a nearby existing open pit or re-inject the water via a second borehole. The second borehole will be located sufficiently far enough away for there to be no, or very limited interaction of the groundwater between the two sites. Further information is provided in the Project Description for the Confirmation and Exploration Program.

5.6 Accommodations and Facilities

Accommodation for up to 200 people will be added at the site to undertake the Confirmation and Exploration Program. In combination with the tent camp, this will increase the accommodation capacity to 249 people overall at the site. The site for the camp will be in previously disturbed area with sufficient space for the camp and the movement of people and vehicles around the camp. A satellite camp may



also be required, within the total accommodations limit. The area will also include water treatment, workshops, fuel storage areas and power distribution equipment. The site currently under consideration is the area to the south of the Teck tailings facility, for example in the location of the previous process plant or disturbed areas in the vicinity. However, other sites will be considered in consultation with the Land Use Inspector, the mobile camp provider and taking into account logistical considerations. Using the previously disturbed areas in the vicinity of the historical Cominco Process Plant site leaves the former townsite accessible for local community use. Camp location, construction and operation will consider the Northern Land Use Guidelines for Camps and Support Facilities (GNWT 2015b).

The new mobile camp will be installed with sleeping quarters, bathrooms, offices, first aid room, recreational room, kitchen, and dining area. The modules of the camp will be connected with corridors, if possible. The new camp may be equipped with flush toilets and/or incinerating toilets, showers, dishwashers, and other water consuming fixtures. Potable water will be sourced from Great Slave Lake north of the old Pine Point Mill site, utilizing the old Cominco T-37 road or sourced from offsite locations, such as the Hamlet of Fort Resolution or the Town of Hay River, or from groundwater.

Other facilities may include a Waste Water Treatment Plant, workshops for geological work and equipment repairs, a laydown area for outside storage and areas for fuel storage and refueling. Power for the camp will be sourced from the existing Northwest Territories Power Corporation substation at the site. A backup generator system based on diesel or liquefied or compressed petroleum gas fuel, or a combination, will be available in case of the power outage. Portable generators will be deployed where needed. Temporary camps may also be established in other areas around Pine Point to reduce travel time. Further information is provided in the Project Description for the Confirmation and Exploration Program.

5.7 Areas Affected by Other Project Activities

Any other areas affected by Project activities that require remediation will be identified in this section.

6.0 Permanent Closure and Reclamation

Closure and reclamation of the work sites will be completed on an ongoing basis. This section provides a summary of preferred closure activities for each of the main Project components.

6.1 Definition

Permanent closure is defined as the final closure of the site with no foreseeable intent by the existing proponent to return to either active exploration or mining.

6.2 Access Trails

If new access trails are needed, they may be cleared using mulchers, bulldozers, loaders, and graders. Construction and maintenance of any new access trails will consider the Northern Land Use Guidelines (GNWT 2015a). Monitoring of access trails will be done to confirm that the natural surface is protected. For example, contractors will use mulchers to clear the historic cutlines, access trails, and drill pads, thereby providing organic material that will be spread on the disturbed areas to encourage vegetation growth that will lessen erosion and improve vegetation re-growth. Pine Point Mining Limited and its



contractors will work with the inspectors to confirm that there is no rutting or other unacceptable disturbance to the land.

6.3 Drilling

The drill hole locations will be accessed by clearing a path from the nearest access point, utilizing the nearest existing previously cleared access trail. The brush may be cleared by hand or by using heavy equipment such as mulchers, dozers, graders and loaders. Cut timber will be stacked at the trail sides or bucked up so it lies flat on the ground surface in the adjacent forest to provide organic material and habitat complexity. Upon departure from a site, cut timber stacked at trail sides will be spread across the drill site and access areas to help with natural revegetation. At each drill site, the overburden (soils and organics) will be pushed to one side of the cleared area and used to cover the area to be reclaimed when drilling is completed at the site.

On completion of drilling at a site, if the hole is not required for ongoing monitoring, the casing may be removed if practicable and the top of the hole capped just below the top of bedrock. Soil will be spread over the cap as closely as possible to the same level as the immediate surrounding grade. All garbage, equipment and supplies will be collected and removed from the site. The site location will be marked using a wooden stake. If additional monitoring is required, the hole will be finished to allow the monitoring and to mitigate interactions with wildlife. The cap will have a vent to allow the dissipation of gases. Drill cuttings placed in the nearest natural or excavated sump will be covered with overburden prior to the closure of the site.

6.4 Metallurgical Bedrock Sampling

The remaining excavated material from each metallurgical sampling site will be back filled into the excavated area. Overburden material stockpiled adjacent to the blasted area will be spread over the disturbed area and graded to restore the natural drainage. The organic material from the stockpile adjacent to the blasted area will be placed on top of the overburden material, with larger timbers place in a random pattern over the top of the organics. Waste rock will be managed as per the Bedrock Sampling Management Plan, a revised version to be provided at least 90 days prior to initiating test pitting.

6.5 Groundwater Testing

The groundwater tests will require the drilling of the large diameter pump test and re-injection wells. The drill cuttings produced are anticipated to be disposed of in a nearby natural depression or in a constructed sump, to be covered prior to closure. The drill holes will be reclaimed as per Section 6.3.

6.6 Accommodations and Other Camp Facilities

The site infrastructure currently includes a tent camp which will continue to be used. The existing camp will continue to place grey water into the sump adjacent to the camp, to be covered prior to closure. Potable water will be trucked to the site. Where sewage is collected rather than processed in an incinerating toilet or similar device, it will be transported to the nearest facility with capacity to receive the waste.



A new mobile camp and all supporting equipment and structures will be delivered and removed by road. Any related other camp infrastructure will be removed at closure. Several workshops are to be constructed on site. At closure, these structures will be decommissioned by economically and environmentally sound means. Empty fuel containers and other refuse will be removed from the site regularly. At project closure, any fuel storage tanks will be removed from site.

6.7 Unauthorized Discharges

Spill response will follow the Spill Contingency Plan. If hydrocarbons are found, as much impacted soil will be removed as is practical, including the source areas and areas of highest concentration. Any impacted soil that is impractical to remove will have an amendment added to speed natural hydrocarbon attenuation.

6.8 Uncertainties and Contingencies

A summary of uncertainties associated with each closure activity and resolution method is included in Table 2.

Component	Uncertainties	Mitigation or Resolution Pathway		
Waste Rock	Although waste rock from bedrock sampling is not anticipated to be acid generating, it will be returned to the pit from where it was extracted, and the surface graded to allow natural drainage, ponding of water is possible	Check parameters of ponded water to determine if acid is forming or if metals are leaching. Re-grade the pile if necessary to allow drainage.		
Groundwater test wells	Release of groundwater to the surface from the test wells	Wells will be capped at completion of studies. If the caps fail and groundwater upwelling occurs, the caps should be repaired and maintained.		

Table 2: Uncertainties Associated with Closure Activities

6.9 Climate Change Considerations

As there are no engineered structures proposed to remain post-closure, climate change is not anticipated to affect the closure planning.

6.10 Integrated Schedule of Activities

A schedule of closure activities will be provided in a future version of this document.

6.11 Post-Closure Site Assessment

A description of how residual impacts of the Project will be assessed following closure activities will be provided in a future version of this document.



6.12 Financial Security

Closure costs were developed using the RECLAIM Model version 7.0, and are summarized in Table 3. A brief overview of the security estimate is as follows:

- No costs are associated with open pit or underground mining or the management of a tailings facility or rock pile, as these activities are not within the scope of the application.
- Building and equipment costs include removal of on-site accommodation and warehouse, as well as any remaining drills and mobile equipment.
- Chemical and contaminated soil management covers disposal costs of residual fuel and investigation and removal of contaminated soils.
- Interim care and maintenance budgets for two annual site visits to inspect and report on license compliance.
- Mobilization / demobilization provides the cost of bringing in an independent construction crew to handle removal.



Capital Costs	Inflation	Cost	Land Liability	Water Liability
OPEN PIT		\$0	\$0	\$0
UNDERGROUND MINE		\$0	\$0	\$0
TAILINGS FACILITY		\$0	\$0	\$0
ROCK PILE		\$0	\$0	\$0
BUILDINGS AND EQUIPMENT		\$461,905	\$362,653	\$99,253
CHEMICALS AND CONTAMINATED SOIL MANAGEMENT		\$46,931	\$22,217	\$24,715
SURFACE AND GROUNDWATER MANAGEMENT		\$0	-	\$0
INTERIM CARE AND MAINTENANCE		\$20,000	-	\$20,000
INFLATION (2014 to 2020)	8%	\$42,307	\$30,790	\$11,517
SUBTOTAL: Capital Costs		\$571,143	\$415,659	\$155,485
PERCENT OF SUBTOTAL			73%	27%
Indirect Costs	Inflation	Cost	Land Liability	Water Liability
MOBILIZATION/DEMOBILIZATION		\$148,776	\$108,274	\$40,502
POST-CLOSURE MONITORING AND MAINTENANCE		\$0	\$0	\$0
INFLATION (2014 to 2020) ON ABOVE 2 LINES	8%	\$11,902	\$8,662	\$3,240
ENGINEERING	3%	\$17,134	\$12,470	\$4,665
PROJECT MANAGEMENT	3%	\$17,134	\$12,470	\$4,665
HEALTH AND SAFETY PLANS/MONITORING & QA/QC	1%	\$5,711	\$4,157	\$1,555
BONDING/INSURANCE	1%	\$5,711	\$4,157	\$1,555
CONTINGENCY	20%	\$114,229	\$83,132	\$31,097
MARKET PRICE FACTOR ADJUSTMENT	0%	\$0	\$0	\$0
SUBTOTAL: Indirect Costs		\$320,598	\$233,320	\$87,278
TOTAL COSTS		\$891,741	\$648,979	\$242,762



7.0 References

Acts Cited

Federal

- Arctic Waters Pollution Prevention Act. RSC 1985, c A-12. Last amended 7 August 2019. Available at <u>https://laws-lois.justice.gc.ca/eng/acts/a-12/</u>
- Canadian Environmental Protection Act, 1999. SC 1999, c 33. Current to 15 July 2020. Available at <u>https://laws-lois.justice.gc.ca/eng/acts/c-15.31/</u>
- Canadian Navigable Waters Act. RSC 1985, c N-22. Last amended 4 October 2019. Available at https://laws.justice.gc.ca/eng/acts/N-22/
- *Canada Wildlife Act.* RSC 1985, c W-9. Last amended 12 December 2017. Available at <u>https://laws-lois.justice.gc.ca/eng/acts/w-9/</u>
- *Explosives Act.* RSC 1985, c E-17. Current to 28 July 2020. Available at <u>https://laws-lois.justice.gc.ca/eng/acts/e-17/</u>
- *Fisheries Act*. RSC 1985, c F-14. Last amended 28 August 2019. Available at <u>https://laws-lois.justice.gc.ca/eng/acts/f-14/</u>
- Mackenzie Valley Resource Management Act. SC 1998, c 25. Last amended 28 August 2019. Available at <u>https://laws-lois.justice.gc.ca/eng/acts/m-0.2/</u>
- Species at Risk Act. SC. 2002, c 29. Last amended 18 December 2019. Available at: <u>https://laws-lois.justice.gc.ca/eng/acts/s-15.3/</u>
- *Transportation of Dangerous Goods Act, 1992.* SC 1992, c 34. Last amended 28 August 2019. Available at <u>https://laws-lois.justice.gc.ca/eng/acts/t-19.01/</u>

Provincial

- Archaeological Sites Act. SNWT 2014, c 9. Available at <u>https://www.justice.gov.nt.ca/en/files/legislation/archaeological-sites/archaeological-sites.a.pdf</u>
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- Safety Act. RSNWT 1998, c S-1. Available at https://www.justice.gov.nt.ca/en/files/legislation/safety/safety.a.pdf
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