



Energy, Mines and Resources

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@ 4:43 pm 10/01/11

Mineral Resources
Mining Land Use
Box 249
Dawson City, Yukon
Y0B 1G0

REPLACES ORIGINAL
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2010/01/11

LP00701

January 11, 2010

Yukon Territory Water Board
Suite 106
419 Range Road
Whitehorse, YT
Y1A 3V1

MINING LAND USE COMMENTS LETTER – PM08-616

NAME: Ralph Troberg, Early Day Adventures Ltd.

ADDRESS: PO Box 105, Dawson City YT, Y0B 1G0

CONCERNS AND RECOMMENDATIONS:

Mining Land Use has reviewed this application for a Water Licence and Mining Land Use Approval and has the following comments and concerns:

The applicant has included information regarding fuel storage and tanks with his application. All fuel storage for this project falls under the 4000 litre threshold and does not require tanks to be registered.

The applicant has indicated that waste, including special waste, will be disposed of in a 45 gallon drum and burned. This is not permitted under the *Yukon Environment Act* or Schedule 1 of the Placer Mining Land Use Regulation without additional permitting under the *Yukon Environment Act*. Any waste fuel and special waste must be disposed of in accordance with the Special Waste Regulations.

The Fuel Spill Contingency Plan included with the application indicates that residual fuels in dirt will spread on plastic for remediation. Any waste fuel must be disposed of in accordance with the Special Waste Regulations.

Inspection reports carried out under licence PM00-173 indicate that waste fuel was being stored in a 45 gallon drum without a secure lid. The applicant is reminded that Schedule 1 of the Placer Mining Land Use Regulation, section 13 requires that all petroleum products, including waste products, be stored in a secure fashion. The same inspection report also indicates that

there was evidence of fuel staining. The applicant is reminded that Schedule 1 of the Placer Mining Land Use Regulation, section 14 requires that all petroleum products be transferred and handled without spillage.

Schedule 1 of the Placer Mining Land Use Regulation requires that the mine site be reclaimed and left in a state conducive to re-vegetation. The vegetative mat must be removed to protect the seed and root stock and must be stored separately from any overburden or bedrock removed for use in re-establishing the vegetative mat when the operation ceases. The applicant indicates that the vegetative mat and overburden will be stripped and stored, but does not indicate that they will be separated. The applicant states that there is little to no black muck left on many parts of the claims. If there is a shortage of materials for reclamation, then all materials suitable for reclamation work must be stockpiled, marked and protected for future reclamation use.

The application states that reclamation will not begin until year 3 of the project. On going reclamation is encouraged.

If you have any questions, or require any further information, please do not hesitate to contact me at (867) 993-5343 or by e-mail at janet.bell-macdonald@gov.yk.ca.

Sincerely,



Janet Bell-MacDonald
Mining Lands Officer

cc: Early Day Adventures Ltd.
Tim Osler, Rical Mining Ltd.
CS&I Mining