

# Yukon Conservation Society



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APPL. NO. \_\_\_\_\_

Ms. Judi White  
Manager, Yukon Water Board  
106-419 Range Road  
Whitehorse, Yukon  
Y1A3V1

March 29, 2007

APPL. NO. QZ04-065

2007 MAR 30 AM 8:56

YUKON WATER BOARD

**Re: Application number QZ04-065 – Yukon Zinc Corporation- Wolverine Project**

Notice of intent to intervene

Dear Ms. White:

Please accept this letter as notice of our intent to intervene in the above mentioned license application. We will have a representative attend any public hearing on this matter.

We have reviewed the project description and supporting documents as presented by the applicant and the Environmental Assessment as presented by the Government of Yukon.

We have the following concerns:

1. Proposed effluent standards

Both of the potential receiving waters in the project area are known fish habitat. Wolverine Creek in particular drains into the Wolverine Lake system. Wolverine Lake is classed under a special system of fisheries management in the Yukon Fisheries Regulations in order to protect its sensitive high quality recreational fishery.

Given the certainty of high levels of acid generation as a result of this project it is imperative that absolutely no effluent from the project either during operation or after closure be allowed to enter Wolverine Creek unless it is of a pre-mining baseline quality level. Additionally, the effluent standards set in the license for Go Creek should at a minimum reflect those set by the Canadian Council of Ministers of the Environment during operation and should revert to pre-mining baseline levels after closure.

2. Proposed decommissioning plan

Although the mitigations proposed for closure of the operation (with the above noted exception of the proposed effluent levels) seem suitable there is a lack of data that indicates that the

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proponent will be able to carry them out. Details as to the suitability of the ground for the construction of the required bypasses, the availability of suitable materials for dams and for covering the tailings are lacking and bring into question the effectiveness of the closure plan. The proposed actions are clear. Where the materials are going to come from and how the actions are going to be carried out taking into account existing conditions is unclear.

Additionally, given the poor record of performance industry wide in North America in predicting water quality upon closure of these kinds of operations, there should be built into the plan allowances for unforeseen contingencies in order to create confidence that the objective of successful closure can be achieved. This has not been done. We have attached a summary of a study entitled **Predicting Water Quality Problems at Hard Rock Mines** for your consideration. Copies of the summary will be sent to the proponent.

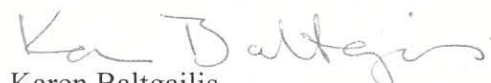
Finally, the contingency plan to use a bio-cell system for portal effluent if necessary after closure does not take into account the fact that these systems often require maintenance and recharging on a very long term basis. This proposal could very well end up in a perpetual care situation, which is not acceptable under the Yukon Government's Reclamation and Closure Policy and draft guidelines.

### 3 Security

As outlined above, many of the required details for a successful closure plan are lacking. This makes it extremely difficult to assess appropriate levels of security. Therefore, rather than a bulk quote for security we would suggest that a costing out of each step for closure is necessary in order to calculate with any confidence what amount of security would be required to close such an operation under worst case scenario conditions. We suggest that a complete step by step costing out of closure operations is necessary and that once done, it should be referred to an independent expert (not hired by the Proponent) for an independent evaluation.

Please feel free to contact YCS Mining Coordinator Gerry Couture at (867) 993-6323 or [glc@northwestel.net](mailto:glc@northwestel.net) if you have any questions.

Sincerely,

  
Karen Baltgailis  
YCS Executive Director

Attachment (1)

c. Yukon Zinc Corporation

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