

Manitoba



**Conservation and Water Stewardship**

Climate Change and Environmental Protection Division  
Environmental Approvals Branch  
123 Main Street, Suite 160, Winnipeg, Manitoba R3C 1A5  
T 204 945-8321 F 204 945-5229  
[www.gov.mb.ca/conservation/eal](http://www.gov.mb.ca/conservation/eal)

**File: 2435.40**

June 6, 2012

Mr. John Hutchison  
San Gold Corporation  
P.O. Box 1000  
Bissett, MB R0E 0J0

Dear Mr. Hutchison:

**Re: San Gold Corporation – Tailings Management Area Expansion Environment Act Proposal**

The initial review of the San Gold Tailings Management Area Expansion Environment Act Proposal (EAP) has been completed.

The review has generated requests for additional information. Please address and provide detailed responses to the comments and requests for additional information from the Technical Advisory Committee (TAC) and public that are presented in the attached items. The EAP review process will continue upon receipt of your response.

In their May 23, 2012 letter, the Canadian Environmental Assessment Agency (CEAA) indicated that an environmental assessment under The Canadian Environmental Assessment Act will not be required. The Department of Fisheries and Oceans (DFO), Health Canada and Environment Canada have offered to provide specialist advice with respect to the project, if specifically requested.

If you have any questions, please contact me at (204) 945-7012.

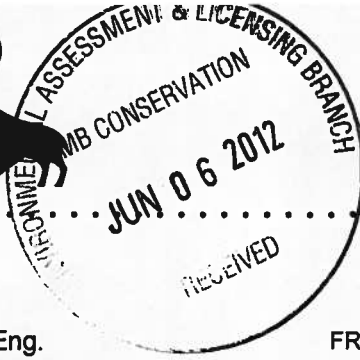
Yours truly,

A handwritten signature in black ink, appearing to read "J Winsor", written in a cursive style.

Jennifer Winsor, P.Eng.  
Environmental Approvals Branch

Enclosures

- c. Ernest Armitt, Director – Manitoba Innovation, Energy and Mines
- Stephen Biswanger - AECOM
- Public Registries



DATE: June 4, 2012  
TO: Jennifer Winsor, P.Eng.  
Environmental Engineer  
Environmental Approvals Branch  
Conservation and Water Stewardship  
123 Main Street, Ste. 160  
Winnipeg MB R3C 1A5

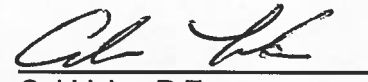
FROM: Cal Liske, P.Eng.  
Chief Mining Engineer  
Mines Branch  
Innovation, Energy and Mines  
360-1395 Ellice Avenue  
Winnipeg MB R3G 3P2

PHONE NO: 945-6517

SUBJECT: **San Gold Environment Act Licence**

With respect to San gold Environment Act Licence application for tailings containment expansion, the following is requested:

- a) identify all First Nations and Aboriginal communities whose traditional activities may be impacted by the project;
- b) engage with identified First Nations and Aboriginal communities;
- c) report on the engagement and integrate any community issues and concerns into the EIS;
- d) provide an assessment of what effects the project may have on the exercise of Aboriginal and Treaty rights of the identified First Nations and Aboriginal communities;
- e) outline any proposed accommodations measures to address the identified effects; and
- f) provide an update to the existing Mine Closure Plan for approval of the Director of Mines by September 30, 2012.

  
Cal Liske, P.Eng.

c. Ernie Armitt

## Winsor, Jennifer (CON)

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**From:** Wiens, Jonathan (CON)  
**Sent:** May-29-12 10:32 AM  
**To:** Winsor, Jennifer (CON)  
**Cc:** Suggestt, Glen (CON)  
**Subject:** Client file # 2435.40

The Wildlife Branch has reviewed the Environmental Impact Assessment, client file # 2435.40 regarding San Gold Corporation – San Gold Tailings Management Area Expansion.

- The proposed expanded tailings management area encompasses an area of approximately 1 km<sup>2</sup> of crown land in south eastern Manitoba. As identified in the environmental assessment, this area provides valuable wildlife habitat for a wide variety of species. By converting functioning forest habitat into an industrial development, the proposed development will negatively affect available wildlife habitat. In this case, the proposed project is located within a newly designated “Moose Conservation Zone”. Due to recent rapidly declining moose populations, Manitoba Conservation is undertaking significant efforts to help conserve and restore moose in this area. These measures include closing licensed moose hunting, implementing moose harvesting restrictions for right’s based hunters, closing trails and roads, implementing wolf management, and reducing the whitetail deer population. Expanded industrial development in this area of Manitoba may create additional pressures to moose recovery.
- It is recognized that the proponent has made an effort to minimize the required size of the project, by considering an area adjacent to an existing disturbed site, and bordering a provincial road. However, where avoidance of major impact on wildlife habitat is not feasible, as in this case, financial compensation would be requested to help meet the draft provincial policy of habitat protection. This policy aims toward no-net-loss of habitat or productivity, and requires compensation for habitat loss arising though industrial and other development.
  - Options for providing compensation are :
    - Securing nearby land and restoring, enhancing, or creating habitat;
    - Securing alternate high-value wildlife habitat and transferring ownership to a conservation agency;
    - Contributing to the *Habitat Compensation Fund*, as administered by Manitoba Habitat Heritage Corporation.
  - An additional option may be to partner with a local conservation agency, such as the Manitoba Model Forest, to support research and conservation of local wildlife species, such as moose and woodland caribou.
- The proponent is invited to contact the Habitat Mitigation Biologist, Jonathan Wiens at [jonathan.wiens@gov.mb.ca](mailto:jonathan.wiens@gov.mb.ca) 204-945-7764, or the Regional Wildlife Manager, Kelly Leavesley at [Kelly.leavesley@gov.mb.ca](mailto:Kelly.leavesley@gov.mb.ca) (204)345-1427, to discuss this matter further.

Jonathan Wiens, MSc  
Habitat Specialist  
Manitoba Conservation  
Box 24 - 200 Saulteaux Crescent  
Winnipeg, Manitoba, R3J 3W3

DATE: May 24, 2012

## Memorandum

TO: Jennifer Winsor, P.Eng.  
Environmental Engineer  
Environmental Assessment and  
Licensing Branch  
Manitoba Conservation and  
Water Stewardship  
123 Main Street, Suite 160  
Winnipeg, Manitoba R3C 1A5

FROM: William Weaver, M.Sc.  
Environmental Review Officer  
Planning and Coordination Branch  
Manitoba Conservation and  
Water Stewardship  
200 Saulteaux Crescent, Box 14  
Winnipeg, Manitoba R3J 3W3

CC: Kevin Jacobs  
Elaine Page  
Laureen Janusz

TELEPHONE: (204) 945-6395

FACSIMILE: (204) 945-7419

**SUBJECT: ENVIRONMENT ACT PROPOSAL FILE NO. 2435.40  
SAN GOLD TAILINGS MANAGEMENT AREA EXPANSION  
SAN GOLD CORPORATION**

The Water Stewardship Division of the Manitoba Department of Conservation and Water Stewardship has reviewed the referenced file, forwarded for comment on April 19 2012.

- The Water Stewardship Division requires an *Environment Act* Licence to include the following:
  - The Licencee shall not release any effluent from a final discharge point if:
    - a) the quality or toxicity of the effluent is in non-compliance with the federal *Metal Mining Effluent Regulations* under the *Fisheries Act*, or b) the effluent quality is resulting in, or is likely to directly or cumulatively result in, a downstream degradation of the water quality immediately beyond a maximum 10% mixing zone (by volume) within No Name Creek and/or the Wanipigow River, relative to the *Manitoba Water Quality Standards, Objectives and Guidelines Regulation* under *The Water Protection Act* and/or nutrient control strategies and regulations developed by the Manitoba Department of Conservation and Water Stewardship.
  - The Licencee shall, in the course of developing a program for the Environmental Effects Monitoring studies, as required by the *Metal Mining Effluent Regulations* under the *Fisheries Act*, consult with the Manitoba Department of Conservation and Water Stewardship for possible additional inclusions or considerations respecting site specific water quality and biological issues, prior to finalizing and undertaking the required Environmental Effects Monitoring studies.

Date: May 24, 2012  
Subject: *Environment Act* Proposal File No. 2435.40  
San Gold Tailings Management Area Expansion  
San Gold Corporation

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- All monitoring data shall be summarized and interpreted in an annual report. In addition to current requirements this report would be required to:
  - 1. Evaluate the concentrations of metals in reference to previous years monitoring and baseline conditions at each site.
  - 2. The report will include any changes in concentrations over baseline conditions and the direction of change.
  - 3. The report will include accidents or malfunctions at the site.
  - 4. The report will include a summary of results from all toxicity tests including a discussion of all acute and sub lethal toxicity results.
  - 5. The proponent will provide an electronic copy of all aquatic monitoring data to the Water Quality Management Section of the Manitoba Department of Conservation and Water Stewardship.
- The Licencee shall construct the tailings facility to achieve a maximum hydraulic conductivity of  $1 \times 10^{-7}$  cm/s, including implementing a liner of compacted clay, synthetic material, or other approved material.
- The Water Stewardship Division submits the following concerns:
  - A concern, for the proposed and increased discharge period, is ensuring that water and sediment quality downstream of the mine are protected to prevent adverse changes to the following receiving surface waters: No Name Creek, Horseshoe Creek, Wanipigow River, and Lake Winnipeg.
  - The Wanipigow River provides habitat throughout the year for a number of large and small-bodied fish. Further, the Wanipigow River is classified as a Class 1 system, meaning it has a high capability for the production of fish.

Date: May 24, 2012  
Subject: *Environment Act* Proposal File No. 2435.40  
San Gold Tailings Management Area Expansion  
San Gold Corporation

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- Recent discharge data have indicated that dissolved copper levels, in the Wanipigow River, located downstream of the discharge site, were double the concentration found in an upstream location. Hardness in the Wanipigow River is only about a third of No Name Creek, thus this system is more sensitive than No Name Creek. Similarly, ammonia concentrations in recent discharge samples have been near or above water quality objectives, in particular the 30-day objective. Adequate monitoring and if necessary water quality modeling will be required to ensure the proposed development meets this requirement, in particular under low flow conditions in No-name Creek and the Wanipigow River.
- The Water Stewardship Division submits the following comments:
  - The Water Stewardship Division does not object to the approval of this proposal, at this time.
  - The proponent needs to be informed of the following for information purposes:
    - Erosion and sediment control measures should be implemented until all of the sites have stabilized.
    - *The Water Rights Act* requires a person to obtain a valid licence to control water or construct, establish or maintain any "water control works." "Water control works" are defined as any dyke, dam, surface or subsurface drain, drainage, improved natural waterway, canal, tunnel, bridge, culvert borehole or contrivance for carrying or conducting water, that temporarily or permanently alters or may alter the flow or level of water, including but not limited to water in a water body, by any means, including drainage, OR changes or may change the location or direction of flow of water, including but not limited to water in a water body, by any means, including drainage. If a proposal advocates any of the aforementioned activities, a person is required to submit an application for a Water Rights Licence to Construct Water Control Works. A contact person is Mr. Geoff Reimer C.E.T., Senior Water Resource Officer, Water Control Works and Drainage Licensing, Manitoba Conservation and Water

Date: May 24, 2012  
Subject: *Environment Act* Proposal File No. 2435.40  
San Gold Tailings Management Area Expansion  
San Gold Corporation

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Stewardship, Box 4558, Stonewall, Manitoba R0C 2Z0, telephone:  
(204) 467-4450, email: [geoff.reimer@gov.mb.ca](mailto:geoff.reimer@gov.mb.ca).

William Weaver, M.Sc.



## Memorandum

**Date:** May 24, 2012

**To:** Jennifer Winsor  
Climate Change and  
Environmental Protection Division  
Environmental Approvals Branch  
123 Main Street, Suite 160,  
Winnipeg, MB R3C 1A5

**From:** Kris Innes  
Environmental Compliance and  
Enforcement  
Conservation and Water  
Stewardship  
Box 4000  
Lac du Bonnet, MB R0E 1A0

<http://www.gov.mb.ca>

**Subject:** SAN GOLD CORPORATION –  
ENVIRONMENT ACT  
PROPOSAL COMMENTS

**Telephone:** 204-345-1428

**Facsimile:** 204-345-1415

**E-Mail:** Kris.Innes@gov.mb.ca

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Conservation and Water Stewardship, Environmental Compliance and Enforcement Branch submits the following comments on the *Request for Alteration to San Gold Corporation's Tailings Management Area Environment Act* proposal submitted by San Gold Corporation on March 22, 2012.

### **2.2 Existing Effluent Quality / 3.3.2.1 Surface Water Quality**

The proponent has noted elevated Copper and Aluminum levels in recent effluent water samples (p. 5) and exceedances of applicable guidelines in water samples collected as part of the EEM program spanning 2007-2010 (p.22). Conservation and Water Stewardship requests information on how exceedances of the applicable criteria for effluent and sediments will be mitigated in the future.

#### **2.3.1.1 Water Balance**

Conservation and Water Stewardship requests further clarification on how the final annual discharge volume is calculated. Specifically, as mine water and mill discharge is pumped back into the TMA, are the water savings resulting from this practice accounted for within a reduction of mine water 'input'? In particular, the end use of reclaim water is unclear as this water is presumably discharged back into the TMA upon reuse. Furthermore, the total amount of water reclaimed is based on a best case scenario in which a daily maximum drilling rate of 2,500 sdtpd is practiced.

#### **2.3.3 Operation**

Conservation and Water Stewardship requests an assessment of the potential for suspension of existing polishing pond sediments resulting from the practice of transferring the new polishing pond and existing tailings pond into the existing polishing pond. This may be further exacerbated by the practice of discharging cell contents until "practically empty". Should the proponent determine that this practice has the potential to reduce effluent quality beyond the applicable criteria, we request mitigation strategies to address these concerns.

Please note that Figure 7 suggests a "continuous" flow from TP1 into PP1 which is not described within section 2.3.3 of the report.



#### **2.3.4.2 Proposed TMA Expansion**

The proponent has indicated "to prevent impounding water against the dyke structures following decommissioning, the general filling strategy of the proposed new main pond will be to create tailings beaches along the upstream side of the dykes ". Conservation and Water Stewardship requests the proponent to identify strategies to prevent excessive mounding of the slurry, which may result in an unauthorized release from the TMA.

#### **3.3.2.2 Groundwater**

Conservation and Water Stewardship requests the proponent to comment on the risk of groundwater contamination as a result of the proposed TMA and ongoing operation of the existing TMA and how any such risks will be mitigated.



Canadian Environmental  
Assessment Agency

101 – 167 Lombard Avenue  
Winnipeg, Manitoba R3B 0T6

Agence canadienne  
d'évaluation environnementale

167, avenue Lombard, bureau 101  
Winnipeg (Manitoba) R3B 0T6

May 23, 2012

**CEAA File No.: 5234**  
**MC File No.: 2435.40**

Ms. Jennifer Winsor  
Manitoba Conservation  
Environmental Stewardship Division  
123 Main Street, Suite 160  
Winnipeg, MB R3C 1A5

Dear Ms. Winsor:

**SUBJECT: Rice Lake Gold Mine Tailings Management Area Expansion – Bissett, MB  
San Gold Corporation**

I am responding to the letter of April 19<sup>th</sup>, 2011 from Tracey Braun, Director, Environmental Assessment and Licensing Branch, Manitoba Conservation to Dan McNaughton, Director, Canadian Environmental Assessment Agency (the Agency) regarding the project identified above.

I have undertaken a survey of federal departments with respect to determining interest in the project noted above. I can confirm that the project information provided was distributed to all federal departments with a potential interest. Based on the responses to the survey the application of the *Canadian Environmental Assessment Act* (the Act) by a federal authority will not be required for this project. I have enclosed copies of the received responses for your file.

Health Canada (HC) has indicated it is not a responsible Authority (RA) for the project, however it could contribute expert knowledge in the area of human health to an RA if requested. Please see the letter HC has provided. The contact person for HC is Rick Grabowecky. He can be reached by email: [Rick.Grabowecky@hc-sc.gc.ca](mailto:Rick.Grabowecky@hc-sc.gc.ca).

The Department of Fisheries and Oceans (DFO) has reviewed the project information and determined it is not an RA for the project. DFO has indicated It could provide its expertise to an RA if requested. The contact person for DFO is Tammy Wruth. She can be reached by phone at (204) 622-4068. DFO would like to be kept informed of the provincial review process.

Environment Canada (EC) has also reviewed the project information and determined it is not an RA for the project. However, EC could provide expert advice related to its mandate to an RA if requested. EC has also provided a letter with comments for the proponent, outlining concerns in the following areas:

1. Species at Risk
2. Migratory Birds
3. Wetlands
4. Water Quality

The contact person for EC is Krista Flood. She can be reached by phone at (780) 951-8946. EC would also like to be informed of the provincial review process.

No other federal interest was identified for the project. Thank you for your effort to ensure coordination and close communication between provincial and federal levels of government.

If I can be of further assistance, please feel free to contact me at (204) 984-3233 or by e-mail at: [Heather.flynn@ceaa-acee.gc.ca](mailto:Heather.flynn@ceaa-acee.gc.ca).

Sincerely,

  
Heather Flynn  
Environmental Assessment Officer

End.

c.c.: Mr. John Hutchison – San Gold  
Ms. Tammy Wruth – DFO  
Ms. Anita Gudmundson – TC  
Mr. Dan Benoit – AANDC

Mr. Stephen Biswanger – AECOM  
Ms. Krista Flood – EC  
Mr. Rick Grabowecky – HC

Canadian Environmental Assessment Agency

Agence canadienne d'évaluation environnementale

101 - 167 Lombard Avenue  
Winnipeg, MB R3B 0T6

101 - 167 avenue Lombard  
Winnipeg, MB R3B 0T6

April 20, 2012

CEAA File No.: 5234  
MC File No.: 2435.40

- |   |   |   |
|---|---|---|
| <input type="checkbox"/> MPMO                             | <input checked="" type="checkbox"/> HC- Rick Grabowecky | <input type="checkbox"/> PARKS - N/A                  |
| <input type="checkbox"/> CTA - John Woodward              | <input type="checkbox"/> HR Dev - N/A                   | <input type="checkbox"/> AAFC - environmental service |
| <input checked="" type="checkbox"/> DFO - Richard Janusz  | <input type="checkbox"/> CNSC - ceaainfo                | <input type="checkbox"/> CFIA - Scott Thompson        |
| <input checked="" type="checkbox"/> INAC - Danielle Black | <input type="checkbox"/> NEB - N/A                      | <input checked="" type="checkbox"/> TC - PNR EA Team  |
| <input checked="" type="checkbox"/> EC - EA South PNR     | <input type="checkbox"/> NRCan - EA-SPI/EE-ISP          | <input type="checkbox"/> WD - Matt Deutscher          |

**SUBJECT: Rice Lake Gold Mine Tailings Management Area Expansion - Blissett, MB  
San Gold Corporation**

**FCR RESPONSE DUE: May 22, 2012**

In accordance with information-sharing requirements of the *Canada-Manitoba Agreement on Environmental Assessment Cooperation* (the Agreement), the Environmental Assessment and Licensing Branch, Manitoba Conservation (MC) has provided a copy of the above-referenced project proposal for review. The project description is available for download on the CEAA Collaboration Website: MB project folder/5234 Rice Lake Gold Mine Tailings Management Area Expansion - MB Folder. The proposal is currently being considered by MC, pursuant to The Environment Act.

Please indicate (by checking the appropriate box) whether or not your department/agency:

- has, or anticipates, a responsibility under Section 5(1) of CEAA to assess the environmental effects of the project (i.e. are an RA).  
If yes, indicate trigger: \_\_\_\_\_ Yes \_\_\_\_\_X\_\_\_\_\_ No
- to determine whether, within your departmental mandate, you would be able to offer specialist advice to a Responsible Authority if requested (subsection 12(3) of the Act); and  
Specify as appropriate: \_\_\_\_\_X\_\_\_\_\_ Yes \_\_\_\_\_ No  
Please see attached response \_\_\_\_\_
- requires additional information to make a determination referred to in a) or b) above.  
\_\_\_\_\_ Yes \_\_\_\_\_X\_\_\_\_\_ No  
If yes, please describe additional information requirements or forward a request within 10 days after making the determination:  
\_\_\_\_\_
- in the absence of a federal trigger, has an interest in the project related to its departmental mandate, and would like to participate in the provincial review (Clause 38(1) of the Agreement). \_\_\_\_\_ Yes \_\_\_\_\_X\_\_\_\_\_ No  
If yes, please describe requested involvement i.e. comments for the provincial Guidelines, review of EIS, etc.  
\_\_\_\_\_

Please respond to the above questions by **May 22, 2011**. If your response to any of the above determinations is positive, please provide the name and means of contact for a departmental representative for the review.

Name: Rick Grabowecky Telephone: 204-984-8318  
Address: 510 Lagimodiere Blvd Fax: 204-983-5692  
E-mail: rick.grabowecky@hc-sc.gc.ca

Signature: [Signature] Date: May 10, 2012

Responses and questions can be forwarded to the following:

Name: Heather Flynn Email: Heather.Flynn@ceaa-acce.gc.ca  
Tel: 204-984-3233 Fax: 204-983-7174



Environmental Health Program  
Regions and Programs Bureau  
510 Lagimodiere Blvd  
Winnipeg, MB R2J 3Y1

May 10, 2012

Your file No. 5234  
Our file MB/SK-2012/13-003

Canadian Environmental Assessment Agency  
Suite 101 - 167 Lombard Avenue  
Winnipeg, MB R3B 0T6

**Subject: Health Canada's Response to the FCR for San Gold Corp's Expansion of the Rice Lake Tailings Area**

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Dear Ms Flynn,

Thank you for your email of April 20, 2012 inquiring about Health Canada's role in the environmental assessment of the aforementioned project under the Federal Coordination Regulations.

Based on the information provided, Health Canada has determined that it is not a Responsible Authority (RA) under Section 5 of the *Canadian Environmental Assessment Act* (the Act) with regards to the present scope of the project.

In the context of subsection 12(3) of the Act, Health Canada currently has expertise in the following biophysical areas related to human health that may apply to the project:

- Air quality effects
- Contamination of country foods (e.g. fish, wild game, garden produce, berries, etc)
- Drinking and recreational water quality
- Radiological effects
- Electric and magnetic fields effects
- Noise effects
- Human health risk assessment (HHRA) and risk management
- Federal air, water, and soil quality guidelines/standards used in HHRAs
- Toxicology (multimedia - air, water, soil), and
- First Nations and Inuit Health

Should an RA, or a territorial / provincial authority, identify any specific human health concerns with respect to the aforementioned project, Health Canada would be pleased to provide expertise

upon request as a Federal Authority, pursuant to subsection 12(3) of the Act, or under a territorial or provincial EA process.


Health Canada has recently published a document entitled "Useful Information for Environmental Assessments" which describes in greater detail Health Canada's areas of expertise and expectations with respect to human health information to be contained in environmental assessments (as applicable). It can be found at:

[http://www.hc-sc.gc.ca/ewh-semt/pubs/eval/environ\\_assess-eval/index-eng.php](http://www.hc-sc.gc.ca/ewh-semt/pubs/eval/environ_assess-eval/index-eng.php)

Note that Health Canada now requires a written request prior to providing any expertise in its possession. The request should be specific on the nature of the expertise requested, preferably outlining targeted questions or concerns, and should include the deadline for Health Canada's response. In order to assist us and avoid unnecessary delays, it is suggested that project information such as the scope of project, the scope of the assessment and the subject areas and/or portions of documents to be reviewed be provided at the time of the request for advice, if you have not already done so.

Your written request for expertise should be forwarded to the attention of the undersigned.

Sincerely,

A handwritten signature in black ink, appearing to read 'R. A.', followed by a long horizontal line extending to the right.

Rick Grabowecky, MSc.  
Regional Environmental Assessment Coordinator  
Prairie Region  
Ph # 204-984-8318  
E-mail: [Rick.Grabowecky@hc-sc.gc.ca](mailto:Rick.Grabowecky@hc-sc.gc.ca)

cc: Lindsay Smith-Munoz (HC)



Canadian Environmental  
Assessment Agency

Agence canadienne  
d'évaluation environnementale

101 - 167 Lombard Avenue  
Winnipeg, MB R3B 0T6

101 - 167 avenue Lombard  
Winnipeg, MB R3B 0T6

April 20, 2012

CEAA File No.: 5234  
MC File No.: 2435.40

- |   |  |   |
|---|--|---|
| <input type="checkbox"/> MPMO                             | <input checked="" type="checkbox"/> HC- Rick Grabowecy | <input type="checkbox"/> PARKS - N/A                  |
| <input type="checkbox"/> CTA - John Woodward              | <input type="checkbox"/> HR Dev - N/A                  | <input type="checkbox"/> AAFC - environmental service |
| <input checked="" type="checkbox"/> DFO - Richard Janusz  | <input type="checkbox"/> CNSC - ceaainfo               | <input type="checkbox"/> CFIA - Scott Thompson        |
| <input checked="" type="checkbox"/> INAC - Danielle Black | <input type="checkbox"/> NEB - N/A                     | <input checked="" type="checkbox"/> TC - PNR EA Team  |
| <input checked="" type="checkbox"/> EC - EA South PNR     | <input type="checkbox"/> NRCan - EA-SP/VEE-ISP         | <input type="checkbox"/> WD - Matt Deutscher          |

**SUBJECT: Rice Lake Gold Mine Tailings Management Area Expansion -- Bissett, MB  
San Gold Corporation**

**FCR RESPONSE DUE: May 22, 2012**

In accordance with information-sharing requirements of the *Canada-Manitoba Agreement on Environmental Assessment Cooperation (the Agreement)*, the Environmental Assessment and Licensing Branch, Manitoba Conservation (MC) has provided a copy of the above-referenced project proposal for review. The project description is available for download on the CEAA Collaboration Website: MB project folder/5234 Rice Lake Gold Mine Tailings Management Area Expansion - MB Folder. The proposal is currently being considered by MC, pursuant to The Environment Act.

Please indicate (by checking the appropriate box) whether or not your department/agency:

1. has, or anticipates, a responsibility under Section 5(1) of CEAA to assess the environmental effects of the project (i.e. are an RA). \_\_\_\_\_ Yes  No  
If yes, indicate trigger: \_\_\_\_\_

2. to determine whether, within your departmental mandate, you would be able to offer specialist advice to a Responsible Authority if requested (subsection 12(3) of the Act); and \_\_\_\_\_ Yes  No  
Specify as appropriate: \_\_\_\_\_

3. requires additional information to make a determination referred to in a) or b) above. \_\_\_\_\_ Yes  No

If yes, please describe additional information requirements or forward a request within 10 days after making the determination: \_\_\_\_\_

4. in the absence of a federal trigger, has an interest in the project related to its departmental mandate, and would like to participate in the provincial review (Clause 38(1) of the Agreement).  Yes \_\_\_\_\_ No  
If yes, please describe requested involvement i.e. comments for the provincial Guidelines, review of EIS, etc. \_\_\_\_\_

Please respond to the above questions by May 22, 2011. If your response to any of the above determinations is positive, please provide the name and means of contact for a departmental representative for the review.

Name: Tammy Wrath Telephone: 204-622-4068

Address: 137 2nd Ave NE Fax: 204-622-4066

E-mail: TammyWrath@dfo-mpo.gc.ca

Signature: [Signature] Date: May 18, 2012

Responses and questions can be forwarded to the following:

Name: Heather Flynn Email: Heather.Flynn@ceaa-acee.gc.ca  
Tel: 204-984-3233 Fax: 204-983-7174





Environment Environnement  
Canada Canada

ENVIRONMENTAL PROTECTION  
PRAIRIE & NORTHERN REGION  
Room 200, 4999-98 Ave. NW  
Edmonton, Alberta  
T6B 2X3

Our file #: 4194-10-5/3265  
Your file #: 5234

May 10, 2012

Heather Flynn  
Environmental Assessment Officer  
Canadian Environmental Assessment Agency  
101 - 167 Lombard Ave  
Winnipeg, MB  
R3B 0T6

Dear Ms. Flynn:

**RE: RICE LAKE GOLD MINE TAILINGS MANAGEMENT AREA EXPANSION**

Environment Canada (EC) has reviewed the Request for Alteration to San Gold Corporation's Tailings Management Area prepared by AECOM (March 2012) for the above proposed project. EC is not a Responsible Authority (RA) under the *Canadian Environmental Assessment Act (CEAA)* because:

- a) EC is not a proponent of the project and is not conducting any act or thing that commits the department to carrying out the project in whole or in part;
- b) EC is not making or authorizing any form of payment or other financial assistance to the proponent for the purpose of enabling the project to be carried out in whole or in part;
- c) EC does not administer any lands involved in enabling the project to be carried out in whole or in part; and
- d) EC does not issue a permit, license, grant an approval or take any action for the purpose of enabling the project to be carried out in whole or in part.

EC is prepared to provide specialist advice or expert information or knowledge on the proposal as per subsection 12(3) of the *CEAA* with a focus on federal statutes, regulations, policy, and associated program concerns as defined by EC's mandate. Should an RA identify additional specific environmental concerns with respect to the aforementioned project, EC, as a Federal Authority, will provide specialist or expert information or knowledge pursuant to subsection 12(3) of the *CEAA*. EC has distributed the above mentioned project to its experts for review and is prepared to submit comments in a separate letter following this FCR response.

EC has an interest in the environmental assessment of this project and would like to be kept informed and may participate in the environmental assessment process, consistent with the intent of Clause 62 of the new *Canada-Manitoba Agreement on Environmental Assessment Co-operation*.

At this time EC would like to remind the proponent and potential RA(s) of their responsibilities to the following four area(s):

**(1) Species at Risk**

EC is reminding responsible authorities of their responsibilities under section 79(1) and 79(2) of the *Species at Risk Act*.

"Every person who is required by or under an Act of Parliament to ensure that an assessment of the environmental effects of a project is conducted must, without delay,

Canada

notify the competent minister or ministers in writing of the project if it is likely to affect a listed wildlife species or its critical habitat.”

“The person must identify the adverse effects of the project on the listed wildlife species and its critical habitat and, if the project is carried out, must ensure that measures are taken to avoid or lessen those effects and to monitor them. The measures must be taken in a way that is consistent with any applicable recovery strategy and actions plans.”

**(2) Migratory Birds**

EC would like to remind the proponent of EC's mandate that includes the protection of migratory birds and their habitat. Regulations pursuant to the *Migratory Birds Convention Act* (MBCA) provide for the conservation of migratory birds and the protection of their nests and eggs. Section 6 of the regulations prohibits the disturbance, destruction, or taking of a nest, egg or nest shelter of a migratory bird. Possession of a migratory bird, nest or egg without lawful excuse is also prohibited. Section 5(1) of the MBCA prohibits the deposition of substances harmful to migratory birds in waters or areas frequented by migratory birds, or in a place from which the substance may enter such waters or such an area.

**(3) Wetlands**

The *Federal Policy on Wetland Conservation* promotes the wise use of wetlands and protection through adequate consideration of wetland concerns in environmental assessments of development projects. The objective of the Policy is to promote the conservation of Canada's wetlands to sustain their ecological and socio-economic functions, now and into the future. The Policy goals promote the maintenance of the functions and values derived from wetlands throughout Canada, recognition of wetland functions in resource planning and economic decisions, enhancement and rehabilitation of wetlands in areas where continuing loss or degradation of wetlands or their functions have reached critical levels, and utilization of wetlands in a manner that enhances prospects for their sustained and productive use by future generations. Wetlands do not operate in isolation and adjacent upland habitats play an integral part in the maintenance of the functions of wetlands.

**(4) Water Quality**

With respect to construction activities and sedimentation, the proponent is reminded of Subsection 36(3) of the *Fisheries Act* that states:

“Subject to subsection (4), no person shall deposit or permit the deposit of a deleterious substance of any type in water frequented by fish or in place under conditions where the deleterious substance or any other deleterious substance that results from the deposit of the deleterious substance may enter such water.”

EC looks forward to continued dialogue and co-operation with respect to this Project. If you have any questions, please contact me at (780) 951-8946.

*(original signed by)*

**Krista Flood**  
Environmental Assessment Coordinator  
Telephone (780) 951-8946  
Facsimilie (780) 495-2444  
[Krista.Flood@ec.gc.ca](mailto:Krista.Flood@ec.gc.ca)



Canadian Environmental Assessment Agency

Agence canadienne d'évaluation environnementale

101 - 167 Lombard Avenue  
Winnipeg, MB R3B 0T6

101 - 167 avenue Lombard  
Winnipeg, MB R3B 0T6

April 20, 2012

CEAA File No.: 5234  
MC File No.: 2435.40

- |   |   |   |
|---|---|---|
| <input type="checkbox"/> MPMO                             | <input checked="" type="checkbox"/> HC- Rick Grabowewky | <input type="checkbox"/> PARKS - N/A                  |
| <input type="checkbox"/> CTA - John Woodward              | <input type="checkbox"/> HR Dev - N/A                   | <input type="checkbox"/> AAFC - environmental service |
| <input checked="" type="checkbox"/> DFO - Richard Janusz  | <input type="checkbox"/> CNSC - ceainfo                 | <input type="checkbox"/> CFIA - Scott Thompson        |
| <input checked="" type="checkbox"/> INAC - Danielle Black | <input type="checkbox"/> NEB - N/A                      | <input checked="" type="checkbox"/> TC - PNR EA Team  |
| <input checked="" type="checkbox"/> EC - EA South PNR     | <input type="checkbox"/> NRCan - EA-SPI/EE-ISP          | <input type="checkbox"/> WD - Matt Deutscher          |

**SUBJECT: Rice Lake Gold Mine Tailings Management Area Expansion – Blissett, MB  
San Gold Corporation**

**FCR RESPONSE DUE: May 22, 2012**

In accordance with information-sharing requirements of the *Canada-Manitoba Agreement on Environmental Assessment Cooperation* (the Agreement), the Environmental Assessment and Licensing Branch, Manitoba Conservation (MC) has provided a copy of the above-referenced project proposal for review. The project description is available for download on the CEAA Collaboration Website: MB project folder/5234 Rice Lake Gold Mine Tailings Management Area Expansion - MB Folder. The proposal is currently being considered by MC, pursuant to The Environment Act.

Please indicate (by checking the appropriate box) whether or not your department/agency:

- has, or anticipates, a responsibility under Section 5(1) of CEAA to assess the environmental effects of the project (i.e. are an RA). \_\_\_\_\_ Yes \_\_\_\_\_  No  
If yes, indicate trigger: \_\_\_\_\_
- to determine whether, within your departmental mandate, you would be able to offer specialist advice to a Responsible Authority if requested (subsection 12(3) of the Act); and \_\_\_\_\_ Yes \_\_\_\_\_  No  
Specify as appropriate: \_\_\_\_\_  
\_\_\_\_\_
- requires additional information to make a determination referred to in a) or b) above. \_\_\_\_\_ Yes \_\_\_\_\_  No  
If yes, please describe additional information requirements or forward a request within 10 days after making the determination: \_\_\_\_\_  
\_\_\_\_\_
- in the absence of a federal trigger, has an interest in the project related to its departmental mandate, and would like to participate in the provincial review (Clause 38(1) of the Agreement). \_\_\_\_\_ Yes \_\_\_\_\_ No  
If yes, please describe requested involvement i.e. comments for the provincial Guidelines, review of EIS, etc. \_\_\_\_\_  
\_\_\_\_\_

Please respond to the above questions by **May 22, 2011**. If your response to any of the above determinations is positive, please provide the name and means of contact for a departmental representative for the review.

Name: Anita Gudmundson Telephone: 204-983-3388  
 Address: \_\_\_\_\_ Fax: \_\_\_\_\_  
 E-mail: \_\_\_\_\_  
 Signature: AGudmundson Date: May 1, 2012

Responses and questions can be forwarded to the following:  
 Name: Heather Flynn Email: [Heather.Flynn@ceaa-acee.gc.ca](mailto:Heather.Flynn@ceaa-acee.gc.ca)  
 Tel: 204-984-3233 Fax: 204-983-7174



Canadian Environmental Assessment Agency

Agence canadienne d'évaluation environnementale

101 - 167 Lombard Avenue  
Winnipeg, MB R3B 0T6

101 - 167 avenue Lombard  
Winnipeg, MB R3B 0T6

2012-04-20  
TR 2012-04-20  
april 2012

April 20, 2012

CEAA File No.: 5234  
MC File No.: 2435.40

- |   |  |   |
|---|--|---|
| <input type="checkbox"/> MPMO                             | <input checked="" type="checkbox"/> HC- Rick Grabowecy | <input type="checkbox"/> PARKS - N/A                  |
| <input type="checkbox"/> CTA - John Woodward              | <input type="checkbox"/> HR Dev - N/A                  | <input type="checkbox"/> AAFC - environmental service |
| <input checked="" type="checkbox"/> DFO - Richard Janusz  | <input type="checkbox"/> CNSC - ceaainfo               | <input type="checkbox"/> CFIA - Scott Thompson        |
| <input checked="" type="checkbox"/> INAC - Danielle Black | <input type="checkbox"/> NEB - N/A                     | <input checked="" type="checkbox"/> TC - PNR EA Team  |
| <input checked="" type="checkbox"/> EC - EA South PNR     | <input type="checkbox"/> NRCan - EA-SP/EE-ISP          | <input type="checkbox"/> WD - Matt Deutscher          |

**SUBJECT: Rice Lake Gold Mine Tailings Management Area Expansion - Bissett, MB  
San Gold Corporation**

**FCR RESPONSE DUE: May 22, 2012**

In accordance with information-sharing requirements of the *Canada-Manitoba Agreement on Environmental Assessment Cooperation* (the Agreement), the Environmental Assessment and Licensing Branch, Manitoba Conservation (MC) has provided a copy of the above-referenced project proposal for review. The project description is available for download on the CEAA Collaboration Website: MB project folder/5234 Rice Lake Gold Mine Tailings Management Area Expansion - MB Folder. The proposal is currently being considered by MC, pursuant to The Environment Act.

Please indicate (by checking the appropriate box) whether or not your department/agency:

- has, or anticipates, a responsibility under Section 5(1) of CEAA to assess the environmental effects of the project (i.e. are an RA). Yes  No   
If yes, indicate trigger: \_\_\_\_\_
- to determine whether, within your departmental mandate, you would be able to offer specialist advice to a Responsible Authority if requested (subsection 12(3) of the Act); and Yes  No   
Specify as appropriate: \_\_\_\_\_
- requires additional information to make a determination referred to in a) or b) above. Yes  No   
If yes please describe additional information requirements or forward a request within 10 days after making the determination: \_\_\_\_\_
- in the absence of a federal trigger, has an interest in the project related to its departmental mandate, and would like to participate in the provincial review (Clause 38(1) of the Agreement). Yes  No   
If yes, please describe requested involvement i.e. comments for the provincial Guidelines, review of EIS, etc. \_\_\_\_\_

Please respond to the above questions by **May 22, 2011**. If your response to any of the above determinations is positive, please provide the name and means of contact for a departmental representative for the review.

Name: Dean Bennett Telephone: 204-983-4816  
Address: 206 365 MARQUETTE ST Fax: 204-983-2936  
WPG MB R3B 3A3  
E-mail: Dean.Bennett@manitoba-conservation.gov.ca  
Signature: D. Bennett Date: April 20/2012

Responses and questions can be forwarded to the following:  
Name: Heather Flynn Email: [Heather.Flynn@ceaa-acee.gc.ca](mailto:Heather.Flynn@ceaa-acee.gc.ca)  
Tel: 204-984-3233 Fax: 204-983-7174

Received - Env.

APR 20 2012

Initial DF



May 23, 2012

To: Jennifer Winsor  
Environmental Approvals Branch  
Conservation and Water Stewardship  
123 Main Street, Suite 160  
Winnipeg, Manitoba  
R3C 1A5

RE: San Gold Corporation – San Gold Tailings Management Area Expansion  
(File: 2435.40)

Fr: Eugene Bear  
Title-holder of Trapline # 11  
Hollow Water First Nations

Dear Ms. Winsor,

I am a trapper from Hollow Water First Nations and title-holder of trapline # 11. My permit for 2011-2012 is TLP-1131137. I have been trapping for fifty years and still trap today.

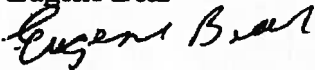
On May 5<sup>th</sup>, 2012, the Winnipeg Free Press advertised a Notice of Environment Act Proposal. The proposal filed on behalf of San Gold Corporation includes construction of an additional main tailings pond and additional polishing pond located immediately east of the existing tailings management area (TMA). Furthermore, the proposal also includes the construction of three new access roads. Two will be constructed on the south side from PR 304 and one on the east side adjacent to the local landfill are also proposed to access the proposed TMA expansion site. The proposal clearly states that "treated" waste water from the proposed polishing pond would be pumped into the existing TMA polishing pond for discharge to No Name Creek between June 15<sup>th</sup> and November 30<sup>th</sup> of any year. The proposal further states that No Name Creek discharges into the Wanipigow River.

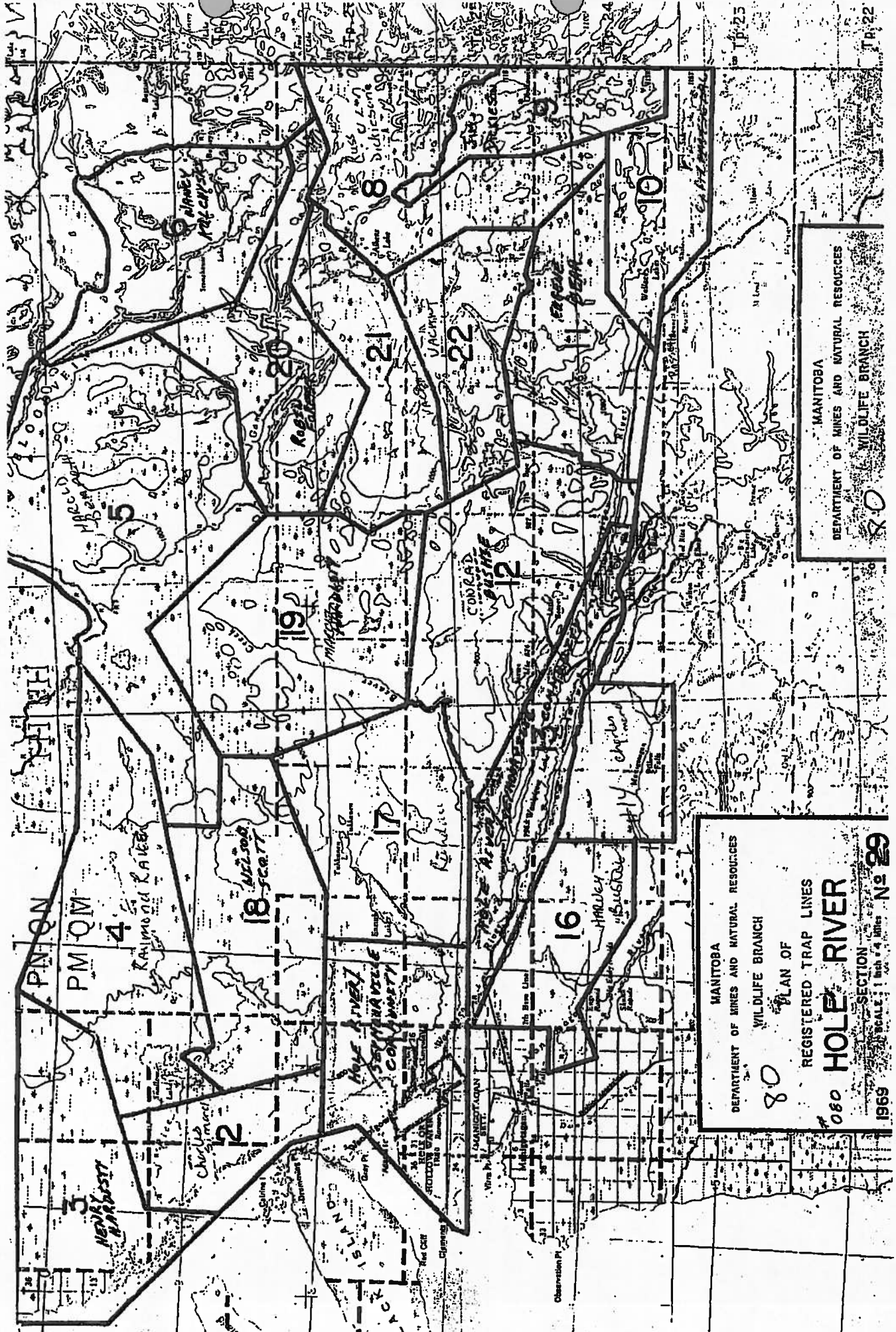
I am deeply concerned, not only as a trapper, but as a community member of Hollow Water First Nations. Wanipigow River affects the community of Hollow Water because it connects through our community and flows to Lake Winnipeg. The chemical waste being dumped into No Name Creek does discharge into Wanipigow River and will affect the drinking water, fisheries and poison the animals that drink from this river. I was not formally consulted or informed by San Gold Corporation or Conservation of the proposed expansion. I live on a reserve that does not receive the Winnipeg Free Press and was fortunate that a community member brought the advertisement to my attention.

I oppose the proposal and would like to request a formal consultation process with the people of Hollow Water First Nations. In the proposal a meeting took place in Bissett, Manitoba, on October 13<sup>th</sup>, 2011. The minutes did not identify the two council men that were present and did not include input from residents of Hollow Water First Nations. I look forward to your response and a date for a consultation meeting for the people of Hollow Water First Nations.

Sincerely,

Eugene Bear





MANITOBA  
 DEPARTMENT OF MINES AND NATURAL RESOURCES  
 WILDLIFE BRANCH  
 80  
 PLAN OF  
 REGISTERED TRAP LINES  
**HOLE RIVER**  
 SECTION 1  
 SCALE 1 inch = 4 miles  
 No 29  
 1969

MANITOBA  
 DEPARTMENT OF MINES AND NATURAL RESOURCES  
 WILDLIFE BRANCH  
 80





May 23, 2012

**To:** Jennifer Winsor  
Environmental Approvals Branch  
Conservation and Water Stewardship  
123 Main Street, Suite 160  
Winnipeg, Manitoba  
R3C 1A5

**RE:** San Gold Corporation – San Gold Tailings Management Area Expansion  
(File: 2435.40)

**Fr:** Kookom's Group of Hollow Water First Nations  
Margaret Bushie- Representative  
Berma Bushie-Representative  
Theresa Sinclair-Representative

Dear Ms. Winsor,

On March 2012 the San Gold Corporation of Bissett, Manitoba proposed the San Gold Tailings Management Area Expansion (File; 2435.40). San Gold Corporation is situated on Hollow Water First Nation's traditional territories under mineral lease ML63. The San Gold Environmental Act Proposal: Notice of Alteration (N.O.A.) to Tailings Management Act (T.M.A) requests to expand the San Gold Corporation and operations. This notice of alteration was conducted to meet the requirements of a major alteration to San Gold's existing Environmental Act licence no. 2628 under the Environmental Act. The Tailings Pond expansion includes major expansions to the current tailings pond and three additional roads.

On October 13, 2011 public consultation was carried out with Bissett council. According to the consultation minutes; Hollow Water First Nation was notified of this project. San Gold offered to meet with Hollow Water Council and it was reported they did not accept the offer or express any concerns over this project. The San Gold Corporation formally agreed to resolve any concerns or questions Hollow Water Council have related to this project. Finally, San Gold will report these meetings to Manitoba Conservation and will work collectively with Hollow Water First Nation.

On May 5<sup>th</sup>, 2012 a public notice was posted in the Winnipeg Free Press outlining the Notice of Environmental Act Proposal. The community of Hollow Water First Nation

does not receive daily publications of the Winnipeg Free Press and fortunate that the advertisement was brought forward to the attention of our group.

We, the Kookom's of Hollow Water First Nation, oppose the proposed expansion of San Gold Corporation. We request a formal consultation meeting with San Gold Corporation and the people of Hollow Water First Nation.

Sincerely,

The Kookom's of Hollow Water First Nation

Theresa Sinclair  
Cynthia Hardisty  
Beth Moneyas  
Isabel Phillips  
Cynthia Bushie  
Robin Huser  
Burnie Bushie  
Laura Hardisty  
Dianne Moneyas  
Bernie Hardisty  
Sharon Sinclair  
Bushie  
Jeanette Cook

**Winsor, Jennifer (CON)**

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**From:** Kaita, Adara (CON) on behalf of +WPG1212 - Conservation\_Circulars (CON)  
**Sent:** May-23-12 10:55 AM  
**To:** Winsor, Jennifer (CON)  
**Cc:** Harms, Jenny (CON)  
**Subject:** EA Proposal - San Gold Corporation - Tailings Management Expansion Area - File 2435.40

The Sustainable Resource and Policy Management Branch and the Lands Branch have no concerns with the proposal for the tailings management expansion area, but offers the following comments:

Please be advised that the Manitoba Government is in the process of developing a provincial peatland strategy to assess the status of Manitoba peatlands, their importance in global climate processes in carbon sequestration and their value in relation to biodiversity. International research has indicated that peatlands are the most efficient terrestrial ecosystem in storing carbon and most important long term carbon store. The peatland strategy is a commitment from the Throne Speech (2009) and strategy development is in process.

The tailings management expansion area outlined in the proposal appears to fall in a wetland/peatland. This may have implications for the peatland strategy under development. Please contact Jenny Harms at 945-4363 or [Jenny.Harms@gov.mb.ca](mailto:Jenny.Harms@gov.mb.ca) (Sustainable Resource and Policy Management Branch) for additional information in this regard.

## Winsor, Jennifer (CON)

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**From:** Mike and Beth koersvelt [mbkoersvelt@mymts.net]  
**Sent:** May-22-12 8:12 AM  
**To:** Winsor, Jennifer (CON)  
**Subject:** SanGold Project

May 22, 2012

*Jennifer Winsor, P.Eng.*  
Environmental Engineer  
Environmental Approvals Branch  
Conservation and Water Stewardship  
123 Main St., Ste. 160  
Winnipeg, MB R3C 1A5

Hello Jennifer,

The Wanipigow Lake East End Cottager's Association held their annual May meeting this past weekend and in regards to the San Gold Tailings Management Area Expansion our Cottager's Association members have a few questions. We would like to know what type of water quality testing is done on Wannipigow River and Lake, how and where it was done, and what the findings of those tests were. Our hopes are that you can direct us to either a person or website that can give us this information.

Also, as an Association we would like to register our care and concern for what happens in Wanipigow Lake and would like to be included in future mailings or meetings with regards to Wanipigow Lake. My contact information is as follows and anything sent to this email address will be forwarded to the current President at that time.

Thank you so much for your time.

Regards,

Mike Koersvelt  
President Wanipigow Lake East End Cottager's Association 2012  
Block 1 Lot 2 Wanipigow Lake East End  
[mbkoersvelt@mymts.net](mailto:mbkoersvelt@mymts.net)  
Home 204.256.0326  
Cell 204.803.0427



**Infrastructure and Transportation**  
**Highway Planning and Design Branch**  
**Environmental Services Section**  
**14<sup>th</sup> Floor – 215 Garry St., Winnipeg, Manitoba R3C 3P3**  
**T (204) 945-5225 F (204) 945-0583**

**May 8, 2012**

**Tracey Braun, M. Sc.**  
**Director, Environmental Assessment & Licensing Branch**  
**Manitoba Conservation**  
**123 Main St., Suite 160, Winnipeg, MB R3C 1A5**

**RE: San Gold Corporation – Tailings Management Area**  
**Client File No 2435.40**

**Dear Director Braun:**

**MIT has reviewed The Environment Act Proposal noted above and we offer the following comments:**

- **Under The Highways and Transportation Act, permits are required from MIT for any new, modified or relocated access unto a Provincial Road (PR). Therefore, a permit would be required for the 2 proposed access connections unto PR 304.**
- **Similarly, any structures (including buildings, dykes, advertising signs, wells, septic fields, etc.) on, under or above the ground within the 38.1 meter (125 ft) controlled area adjacent to a PR, any discharging of water or other liquid materials into the PR's ditch and placing of any plantings within 15.2 metres (50 feet) of the PR's right-of-way will also require permit from MIT.**
- **For permitting requirements, please contact Mr. Kevin Nimchuk, Senior Access Management Analyst, at (204) 945-5658.**

**Thank you very much for providing us the opportunity to review the proposal.**

**Sincerely,**



**Christopher Clary-Lemon, P. Eng., P. E.**  
**A/Manager of Environmental Services**

## Winsor, Jennifer (CON)

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**From:** Payment, Jen (CHT)  
**Sent:** May-28-12 3:41 PM  
**To:** Winsor, Jennifer (CON)  
**Cc:** Smith, Brian (CHT)  
**Subject:** San Gold Tailings Area Expansion EAP (our file AAS-12-4131)

Good Afternoon Jennifer,

Please note: the cover letter on the EAP states that "a non-reply will be considered as indicating your department has reviewed the proposal and has no concerns." This is why no reply was sent.

The proposal was reviewed on May 8<sup>th</sup>. Section 5.13 Heritage Resources of the Report "Request for alteration to San Gold Corporation's Tailings Management Area" contains acceptable mitigation measures for this project. The Historic Resources Branch has no concerns.

Regards,

### **Jenny Payment**

Impact Assessment Archaeologist  
Historic Resources Branch  
213 Notre Dame Avenue, Winnipeg, MB  
R3B 1N3  
Phone (204) 945-4768; Fax (204) 948-2384  
E-mail: [Jen.Payment@gov.mb.ca](mailto:Jen.Payment@gov.mb.ca)



**Culture, Heritage, Tourism**

## **Winsor, Jennifer (CON)**

---

**From:** Arnold, Ginger (CON)  
**Sent:** May-24-12 1:54 PM  
**To:** Winsor, Jennifer (CON)  
**Cc:** Missyabit, Ron (CON)  
**Subject:** TAC comment: San Gold Corporation - Request for Alteration to the Tailings Management Area  
**Attachments:** crown-aboriginal\_consultation\_initial\_assessment\_and\_record\_of\_conclusion.docx

Good Day Jennifer,

ARB has reviewed the San Gold Corporation request for alteration to the TMA and has concluded that a Crown Aboriginal Consultation Initial Assessment and Record of Conclusion be completed by the responsible department (Mines) and that Hollow Water be scoped as a potentially affected community by this decision.

The Government of Manitoba recognizes it has a duty to consult in a meaningful way with First Nations, Métis communities and other Aboriginal communities when any proposed provincial law, regulation, decision or action may infringe upon or adversely affect the exercise of an Aboriginal right or treaty right of that Aboriginal community. This duty arises out of the recognition and affirmation of Aboriginal rights and treaty rights under section 35 of the *Constitution Act, 1982*.

Regards,

***Ginger Arnold***

*Senior Policy Analyst  
Aboriginal Relations Branch  
Corporate Policy Division  
Conservation and Water Stewardship  
200 Saulteaux Crescent  
Winnipeg MB, R3J 3W3  
[Ginger.Arnold@gov.mb.ca](mailto:Ginger.Arnold@gov.mb.ca)  
(204) 945-0007*



## **Winsor, Jennifer (CON)**

---

**From:** Lusk, Jennifer (CON)  
**Sent:** May-18-12 8:23 AM  
**Cc:** Winsor, Jennifer (CON)  
**Subject:** San Gold Corporation - San Gold Tailings Management Area Expansion (Client File 2435.40)

Parks and Natural Areas Branch has reviewed the proposal filed pursuant to the Environment Act for the San Gold Corporation – San Gold Tailings Management Area Expansion (client file 2435.40). The Branch has no comments to offer.

Jennifer Lusk for Jessica Elliott

**Jennifer Lusk**  
Policy Analyst & MRT Coordinator  
Sustainable Resource & Policy Management  
Manitoba Conservation & Water Stewardship  
160-123 Main Street  
Winnipeg, MB R3C 1A5  
Tel: 204-945-4391  
Fax: 204-948-2357



# Memorandum

Local Government

**DATE: May 8, 2012**

<b>To:</b>	Jennifer Winsor Environmental Assessment and Licensing Branch Manitoba Conservation 160 – 123 Main Street Winnipeg MB R3C 1A5	<b>From:</b>	Kate Moir Community Planner Community Planning Services Intergovernmental Affairs Box 50, 125-20 First Street Beausejour MB R0E 0C0
<b>Phone:</b>	(204)945-7012	<b>Phone:</b>	(204)268-6064
<b>Fax:</b>	(204)945-5229	<b>Fax:</b>	(204)268-6007
<b>Email:</b>	Jennifer.winsor@gov.mb.ca	<b>Email:</b>	Kate.moir@gov.mb.ca

**SUBJECT: San Gold Corporation – San Gold Tailings Management Area Expansion  
File No. 2435.00 (Bisset)**

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The subject lands for the expansion of the tailings management area are located within Township 24 Range 13 and 14 EPM approximately 1 km east of Rice Lake Mill, located north of the community of Bisset. According to the application the lands are currently leased by San Gold Corporation.

Community Planning has no concerns with the proposed development.

*sent via email*

Kate Moir  
Community Planner

cc. Samantha Shaler, Provincial Planning Services  
Bill Sawka, Community Planning Services  
Debra Litke, Community Planning Services

**Winsor, Jennifer (CON)**

---

**From:** Molod, Rommel (CON)  
**Sent:** May-08-12 10:41 AM  
**To:** Winsor, Jennifer (CON)  
**Subject:** San Gold Corporation - San Gold Tailings Management Area Expansion (2435.40)

Jennifer,

The Air Quality Section has reviewed the above EA proposal and potential air quality related concerns are adequately addressed. No significant impact on air quality is expected provided that the measures cited in the proposal are implemented.

Thank you for the opportunity to review.

Rommel

**Rommel Molod**  
Air Quality Specialist  
Environmental Programs and Strategies Branch  
Climate Change and Environmental Protection Division  
Manitoba Conservation and Water Stewardship  
Suite 160 123 Main Street  
Winnipeg MB R3C 1A5  
T (204) 945-7047  
F (204) 945-1211

**Manitoba**



**Labour and Immigration**

**Workplace Safety and Health Division**

143 Main Street, Flin Flon, Manitoba, Canada R8A 1K2  
T 204-687-1621 F 204-687-1623  
[www.safemanitoba.com](http://www.safemanitoba.com)

25 April, 2012

Conservation and Water Stewardship  
Climate Change and Environmental Protection Division  
Environmental Approvals Branch  
123 Main Street, Suite 160  
Winnipeg, MB  
R3C 1A5

Attention: Jennifer Winsor

Re: San Gold Corporation - San Gold Tailings Management Area Expansion

Received and reviewed the proposal pursuant to the Environmental Act. The proposal provides the majority of the information required under the Operation of Mines Regulation MR212/2011. We will be in contact with San Gold to obtain any additional information we require.

Workplace Safety and Health have no concerns.

Sincerely

J. Edward (Ted) Hewitt, P. Eng.  
Senior Mining Engineer/District Manager  
Mine Safety Branch  
Family Services and Labour  
Labour Operations  
Workplace Safety and Health

cc: Dennis Fontaine, Larry Poleschuk

**Manitoba**  
spirited energy