

## Yukon Environmental and Socio-economic Assessment Act

### Decision Document

This document meets the decision bodies' requirements as set out in the *Yukon Environmental & Socio-economic Assessment Act*.

#### Decision Bodies for this Project

Yukon government

### Project

**Project Name** Class 4 - Quartz Exploration - Brewery Creek **YESAB File Number** 2021-0093

**Proponent Name** Sukie Sidhu

**Company Name** Sabre Gold Mines Corp.

#### Project Description

Project Scope - Summary

The Project is a quartz exploration program on 1075 claims around Brewery Creek. The Project is the continuation of an existing quartz exploration project under licence LQ00364. The site is approximately 57 km east of Dawson City and accessed along existing roads. The Project is located within the Tr'ondëk Hwëch'in and First Nation of Na-Cho Nyak Dun Traditional Territories, and is adjacent to several Tr'ondëk Hwëch'in Settlement Land parcels (R-7A, R-80B, R-22B, R-79B, S-159B, R-2A). No activities are proposed on Settlement Land. Project activities are proposed to occur seasonally for 10 years.

The complete project scope and activities list are the same as indicated in the Evaluation Report and are appended to this decision document.

### Decision Bodies for this Project

**Consolidated Decision Document** Not Applicable

### First Nations Consultation

**A. Consultation under YESAA section 74(2)** Not Applicable

#### B. First Nations Consultation - General

First Nation of Na-Cho Nyak Dun (NND): Mineral Resources Branch (MRB) initiated consultation by emailing a consultation letter to NND on August 10, 2021. NND submitted comments to the YESAB online registry September 7th, 2021. MRB sent a second consultation letter December 20, 2021 when the Evaluation Report was posted. MRB emailed a consultation letter and a Draft Decision Document to NND December 24, 2021. NND requested a one-week extension on the comment deadline January 14, 2022. The extension was granted the same day by MRB. NND provided a response on January 21, 2022, stating that while NND was not suggesting new terms, NND wanted to be informed of any further modification to the Decision Document. MRB responded January 21, 2022. MRB sent a second draft Decision Document to NND February 4, 2022. In their February 10, 2022 response, NND had no objections or concerns with the latest draft of the Decision Document if TH accepted the additional terms.

Tr'ondëk Hwëch'in (TH): Mineral Resources Branch (MRB) initiated consultation by emailing a consultation

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letter to TH on August 10, 2021. TH sent an email to MRB to inform of their interest to consult August 11, 2021. TH confirmed their request for consultation by sending a consultation letter to MRB on August 12, 2021. MRB confirmed a Draft Decision Document will be shared with TH in an email on August 13, 2021. TH submitted comments to the YESAB online registry September 7, 2021. MRB sent a consultation letter and a Draft Decision Document to TH December 24, 2021. TH requested a two-week extension on the comment deadline January 4, 2022. MRB granted the extension the same day. TH requested to be re-sent the consultation letter and Draft Decision Document January 21, 2022. MRB sent the requested documents to TH the same day. TH submitted comments on the Draft Decision Document January 27, 2022. MRB confirmed the reception of the comments the same day. MRB sent a second Draft Decision Document and a consultation letter February 4, 2022. MRB did not receive a response.

## YESAB Recommendation

Under s. 56(1)(b) of the *Yukon Environmental and Socio-economic Assessment Act*, the Dawson City Designated Office recommends to the Decision Bodies that the Project be allowed to proceed, subject to specified terms and conditions. The Designated Office determined that the Project will have significant adverse environmental and socio-economic effects in or outside Yukon that can be mitigated by those terms and conditions.

## Decision

Pursuant to section 75 and 80, the Yukon government has considered the assessment of this project and:

- ☐ Accepts the recommendation and the terms and conditions as follows:
- ☐ Rejects the recommendation and the terms and conditions as follows for the reason(s) specified:
- ☒ Varies the recommendation and the terms and conditions as follows for the reason(s) specified:

### Rationale for Decision

After giving full and fair consideration to the Evaluation Report and supporting information, including the scientific information, traditional knowledge and other information provided with the recommendation contained in the Evaluation Report, the Decision Body varies the recommendation and the terms and conditions of the Dawson Designated Office.

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Term	Term & condition	Status	Reason
1	<p>YESAB: Prior to conducting bulk sampling, a plan must be developed that describes how Metal Leaching and Acid Rock Drainage (ML/ARD) test work will be conducted and what mitigation and monitoring will be in place to reduce risks.</p> <p>NEW Term: Prior to conducting bulk sampling, The Proponent shall submit a plan to the Chief, Mining Land Use, for review and approval, that describes how Metal Leaching and Acid Rock Drainage (ML/ARD) test work will be conducted and what mitigation and monitoring will be in place to reduce risks.</p>	Change	Term varied for clarity to term proposed by Environment, Yukon Government.
2	YESAB: All bulk sample bags shall be removed from the site at the end of the exploration season, or by Dec 31st each year	Agree	--
3	YESAB: The Proponent shall follow a three-phased approach to mitigate effects to migrating caribou. The three phases shall be implemented as per the following table: [See Appendix B]	Agree	--
4	YESAB: Reclamation and/or decommissioning of roads and trails shall be progressive in nature and shall be documented annually in the post-season report. Reclamation and/or decommissioning of roads and trails shall occur as soon as roads and trails are no longer needed for exploration activities unless the need is documented in the post- and pre-season reports. The status of roads and trails (i.e. active or inactive) including an attributed GPS track of all newly created roads and trails (i.e. road or trail width and surface material) and on-going/completed reclamation activities shall be reported to the Chief, Mining Land Use annually via post-season reports.	Agree	--
5	YESAB: The Proponent shall store all attractants, including garbage, kitchen waste and strained solids from grey water in a container that prevents access by bears and other wildlife, until properly disposed of according to the Solid Waste Regulations or burned daily to ash by forced air and fuel fired incineration according to the Air Emissions Regulations.	Agree	--
6	YESAB: The Proponent shall install a portable electric fence around the perimeter of camp, or at the very minimum, around the kitchen, food preparation area, grey water sump, and waste disposal area.	Agree	--
7	YESAB: Activities shall be avoided within 500 m of lek sites from April 1 to April 20 between 5 am 10 am, and within 1 km of leks during the peak attendance period, from 5 am to 10 am between April 20 and May 4.	Agree	--

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Term	Term & condition	Status	Reason
8	<p>YESAB: Clearing within 2 km of active nesting sites shall not occur during the Sharp-tailed grouse nesting period from May 7th to June 8th.</p> <p>NEW Term: If a nesting site is identified and active, the proponent should avoid stripping and clearing activities within 2 km of the nest location during the sharp-tailed grouse nesting period May 7th to June 8th.</p>	Change	Term varied for clarity and to conform to the term suggested by Yukon Government-Environment.
9	YESAB: The Proponent shall notify the Dawson Regional Biologist (867-993-6461) of any newly identified lek locations.	Agree	--
10	YESAB: A heritage resources impact assessment shall be completed in advance of ground disturbing activities in areas with elevated potential for the presence of archaeological or historic sites. This includes areas identified in 2016 as "Heritage Potential Zone-Surveyed-High" and "Heritage Potential Zone-Unsurveyed".	Agree	--
11	YESAB: Upon discovery of a heritage resource, the Proponent shall notify the Heritage Department of Tr'ondëk Hwëch'in and of the First Nation of Na-Cho Nyak Dun in addition to Government of Yukon, Chief of Mining Lands and Yukon Heritage.	Agree	--
12	YESAB: A flagged 30 m 'no work zone' shall be maintained around archaeological site LaVg-3	Agree	--
13	NEW Term: All heavy equipment, vehicles and off-road vehicles shall be clean and free of seed and plant material prior to entering access trails and the mine site. This may require that equipment be steam-cleaned and/or power-washed.	Add	Term added through First Nation consultation.
14	NEW Term: The Proponent shall familiarize themselves with the types and management of invasive species in the Yukon. The Yukon Invasive Species Council (YISC) document "Why Should I Care About Invasive Species?" will provide guidance, found at the following site: <a href="http://www.yukoninvasives.com/pdf_docs/WhyshouldIcare2011_sm.pdf">http://www.yukoninvasives.com/pdf_docs/WhyshouldIcare2011_sm.pdf</a> .	Add	Term added through First Nation consultation.
15	NEW Term: The Proponent should report the presence of any invasive plants that are listed on the Yukon Invasive Species Council website: <a href="http://www.yukoninvasives.com/plants.html">http://www.yukoninvasives.com/plants.html</a> to Government of Yukon by email (invasives@gov.yk.ca) to the Yukon Conservation Data Centre (at 867-667-5331 or Toll free at 1-800-661-0408 local 5331), should they be encountered.	Add	Term added through First Nation Consultation.

## Date

**Project Recommendation Issued** 2021-12-17

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### Recommendation Received From

Designated Office - Dawson City

### Authority

By signing below, the Yukon government has exercised its authority as per YESAA section 75 to issue a decision document on this project.

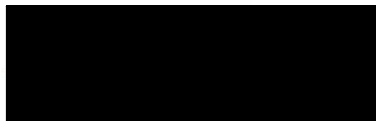
**Name** Todd Powell

**Position** Director, Mineral Resources

**Phone** 667-3126

**Email** todd.powell@yukon.ca

**Signature**



**Date** March 16, 2022

Original signed by EMR-Mineral Resources Branch

### Distribution

Project Proponent	Yes
Other Decision Bodies	No
Major Projects Yukon, Executive Council	Yes
YESAB Designated Office	Yes
YESAB Executive Committee	No
Yukon Surface Rights Board	No
Yukon Water Board	No
Land Use Planning Commission	
Independent Regulatory Agency	
Other Body/Person as Required	

## Decision Document

**Project Name Class 4 – Quartz Exploration – Brewery Creek**

**YESAB File Number: 2021-0093**

**Proponent Name: Sukie Sidhu**

**Company Name: Sabre Gold Mines Corp.**

## Appendix A: Project Scope

### Project Summary

The Project is a quartz exploration program on 1075 claims around Brewery Creek. The Project is the continuation of an existing quartz exploration program currently licenced as LQ00364. The site is approximately 57 km east of Dawson City and accessed along existing roads. The Project is located within the Tr'ondëk Hwech'in and First Nation of Na-Cho Nyak Dun Traditional Territories and is adjacent to several Tr'ondëk Hwech'in Settlement Land parcels (R-7A, R-80B, R-22B, R-79B, S-159B, R-2A). No activities are proposed on Settlement Land. Activities will occur year-round, for 10 years.

### Project Activities

- No exploration activities will occur in the following reclaimed areas: Blue Pit, Moosehead, Ice Fog, North Slope, and Pacific. Additionally, no exploration activities will occur in the camp area or the heap leach facility
- Use of heavy equipment
  - If activities are to occur in the spring, sharp-tailed grouse surveys will be conducted within 500 m radius of the work area. If a lek is located, a 200 m limited disturbance buffer will be implemented for the active lek period. There will be no new disturbance within the lek, and there will be no traffic within 200 m before 10 AM or after 8 PM. This will be implemented for activities from late March through early June. This may be adjusted by site-specific measures such as topography that limits visibility of activity from a lek site.
  - If a sharp-tailed grouse nest is located, a 200 m no disturbance buffer will be implemented for the active nesting period.
- Access Development
  - 15 km (7m wide) of new roads
  - 15 km (2.5 m wide) of new trails
  - 30 km upgrading of existing roads
  - Water bars, cross ditches, appropriate sloped grading and crowning to mitigate/control surface road runoff from entering watercourses
  - New roads and trails will be constructed at least 30 m from watercourses
  - No new fords, bridges or culverts
  - Culvert reconstruction where necessary
  - Trails, if satisfactory in length, will be dog-legged to interrupt sightlines
  - Helicopter use for emergency purposes

- Avoid helicopter flights over areas where caribou are concentrated on their winter range or during the fall rut where conditions permit.
- Pilots will follow the Flying in Caribou Country guidelines when safe to do so and adhere to the following vertical flight altitudes:
  - Maintain vertical flight altitudes  $\geq 300$  m above ground level throughout the year;
  - Maintain vertical flight altitudes  $\geq 600$  m above ground level during calving and post-calving (15 May to 15 July) and rut (15 September to 15 October).
- When caribou are observed, flight routes will be modified to maximize the vertical and horizontal separation distance between the aircraft and the animals. Whenever possible, a minimum 1,000 m horizontal distance from caribou will be maintained, especially during seasonally sensitive time periods.
- When caribou are observed and an evasion response is detected, aircrafts should ascend to a higher flight altitude and veer away from caribou when safe to do so.
- Flight routes will be adjusted to avoid areas where caribou were recently observed or areas where they are regularly observed and, whenever possible, flight paths will place a mountain ridge between the aircraft and caribou until they have left the area.
- Mechanized trenching
  - Up to 55 trenches (average size 30 m long x 1.5 m wide x 2 m deep)
  - Total volume is 10 000 m<sup>3</sup>
  - Maintain at least a 30 m vegetation buffer between trenches and watercourses
  - All stockpile material from the excavation of trenches will be located at least 30 m from natural watercourses.
  - Trenches sloped at one end and backfilled as soon as no longer needed
  - Trenches will be visually inspected for signs of sulphide mineralization. Trenches with sulphide mineralization present will be prioritized for progressive reclamation.
  - Reclaimed exploration trenches areas will be contoured to shed water away from the excavation using angles that will not result in sedimentation and erosion
- Drilling
  - Water use:
    - Up to 100 m<sup>3</sup>/day
    - water sourced from nearby creeks
    - use of fish screens
  - Up to 6 drill rigs operating simultaneously
  - Reverse Circulation
    - Up to 1 500 holes
    - 20 000 m
  - Diamond
    - Up to 1 500 holes

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- 20 000 m
  - No discharge to the environment. Only biologically inert drilling fluids will be used and all drill fluids will be contained in a sump 30 m from any watercourse.
  - No drilling within 30 m of any watercourse
  - Drill sites will be progressively reclaimed throughout the season
  - All sumps must be at least 30 m away from the highwater mark and must only contain drill cuttings.
- Clearing
  - Up to 100 clearings per claim each year for drilling
    - 300 m<sup>2</sup> for drilling (total 30 000 m<sup>2</sup>)
  - Up to 5 clearings per claim each year for trenching
    - 200 m<sup>2</sup> for trenching (total 1 000 m<sup>2</sup>)
  - Up to 3 clearings per claim each year for bulk sampling
    - 600 m<sup>2</sup> for bulk sampling (total 1 800 m<sup>2</sup>)
  - Clearings will occur at least 30 m from watercourses
  - Prior to clearing for trenches a pre-clearing ground survey of the area will be conducted to determine if there are nesting birds in the area.
  - Clearing will be avoided within 1 km of known raptor nests between April 1 to July 31.
- Fuel Storage
  - Diesel : 55 000 L
  - Gas : 5 000 L
  - Propane : 30 000 L
  - Jet A and B : 2 000 L
  - Oil: 800 L
  - Fuel will be stored in double walled approved envirotanks
  - Appropriately sized spill kits will be located near all fuel sources
  - Fuel and refueling will be at least 30 m from watercourses
- Bulk Sampling
  - Up to 5 000 tonnes/year (50 000 tonnes total;
  - Material trucked off site to a contractor laboratory site
  - Bulk samples will be placed on a level lined surface, 100 m away from any watercourse, and removed from site as soon as possible. Arrangements for transport will be made prior to excavation to ensure the material be moved within a reasonable timeframe
- Continued use of 120-person camp
  - Camp used year-round
- Waste Management
  - Continued use of permitted Solid Waste Disposal Facility and Incinerator
    - Located 500 m from camp
    - Enclosed in an electric fenced area
  - Special Waste Storage Area (sea-can)
- Progressive and final reclamation



- Slope stability in steep areas will be checked and re-contoured/re-vegetated as required.
- Any ditches or berms that may cause water to channel will be re-graded.
- Stockpiled topsoil, brush and other organic debris will be distributed over disturbed areas to promote re-vegetation.
- All trenches, including areas of bulk sample removal, will be immediately backfilled.
- Progressive and final reclamation activities for access development
  - Deteriorating sections of the roads/ trails will be repaired on an ongoing basis
  - All areas will be re-sloped, contoured or otherwise stabilized to prevent long-term soil erosion, slumping and subsidence
  - Compacted surfaces will be scarified to promote re-vegetation
  - Re-establishment of the vegetative mat
  - On steep slopes, earth berms may be built to divert surface runoff away from the road surface
  - Compacted surfaces will be scarified
  - Roads/trails will be re-contoured, as necessary
- No transportation or use of cyanide
- No activities in wetlands
- All hazardous substances at the site will have secondary containment structures to capture and contain the accidental release of hazardous substances
- Stockpiling of material will be at least 30 m from any watercourse Proponent will communicate seasonal activities and timing of activities to Tr'ondëk Hwëch'in citizens that may be affected by the proposed project by sharing Sabre Mines pre-season plan
- Proponent will work with self-governing First Nations to identify and resolve potential land use conflicts and any potential negative effects
- No alcohol or illegal drugs shall be permitted on the project site

## Decision Document

**Project Name Class 4 – Quartz Exploration – Brewery Creek**

**YESAB File Number: 2021-0093**

**Proponent Name: Sukie Sidhu**

**Company Name: Sabre Gold Mines Corp.**

## Appendix B: 3-Phase Approach Table (Term 3)

Response Level	Triggers	Response
1	When one or more collared Fortymile caribou move east of Dawson or one or more collared Porcupine Caribou move into the Klondike watershed, the Proponent shall take the following steps in anticipation of a large number of caribou arriving at the project area:	<ul style="list-style-type: none"> <li>- Notify all site personnel that caribou are approaching the project area and to remain alert to the presence of caribou. Staff should be aware that a temporary shutdown of activities may be required and the timeline that may be required to occur in.</li> <li>- Environmental monitors to conduct site inspection to identify any hazards or risks, report on those risks, and ensure mitigations can be enacted before arrival of caribou herd.</li> <li>- Any sightings of caribou to be reported immediately to the Regional Biologist.</li> <li>- Briefings on caribou movements to occur with the Regional Biologist as identified by the Regional Biologist.</li> </ul>
2	When one or more collared Fortymile caribou move east across the Dempster Highway or west of Hamilton Creek; or one or more collared Porcupine Caribou move south of Antimony mountain or north of Strickland Lake, the Proponent shall take the following steps in anticipation of a large number of Caribou arriving at the project area:	<ul style="list-style-type: none"> <li>- Restrict all non-essential traffic on project roads and plan access road activity to reduce the frequency of disturbance to caribou (e.g. convoy vehicles off site to Dempster Highway during shift change).</li> <li>- Reduce speed limit on road to 40 km/h to reduce the likelihood of collisions with caribou.</li> <li>- Defer non-essential project activities to a later date including drilling and blasting activities.</li> <li>- Place additional signage as required to manage human traffic away from key pinch points, concentrations of caribou, or areas with additional risk of vehicular strikes.</li> <li>- Ensure temporary shutdown identified in response level 3 is being implemented with the goal of being shut down before caribou enter the 1 km project buffer.</li> </ul>
3	Applies to migratory movements only - does not apply to overwintering groups of caribou: triggered by one or more collared caribou (Fortymile or Porcupine) within 1 km of project activities or observations of large groups of caribou within 1 km	<ul style="list-style-type: none"> <li>- All exploration activities are to be shut down prior to caribou entering this zone but camp may remain open.</li> <li>- Temporarily stop all traffic along major roads.</li> <li>- Environmental monitors will monitor movement of caribou through the area and immediately address any project related problems that appear to be impeding caribou movements.</li> <li>- Contact the Regional Biologist to discuss project activity if caribou remain in the area for more than 2 weeks.</li> </ul>