



7th Floor - 4922 48th Street
PO Box 2130, Yellowknife NT X1A 2P6

Tel: 867-669-0506 Fax: 867-873-6610
www.mvlwb.com

December 9, 2025

File: MV2025L8-0006
MV2025C0015

Mark Cliffe-Phillips
Mackenzie Valley Review Board
200 Scotia Centre
Box 938, 5102-50th Avenue
Yellowknife NT X1A 2N7

Sent by email

Dear Mark Cliffe-Phillips,

Re: Yellowknife City Gold Project – Notice of Preliminary Screening Determination – Renewal Applications for Land Use Permit and Water Licence – Mineral Exploration – Sᑭᑭ'mbak'è/Yellowknife, NT

The Mackenzie Valley Land and Water Board (Board) met on December 4, 2025, and considered the Application Package from Gold Terra Resource Corp. (Gold Terra) for Land Use Permit (Permit) MV2025C0015 and Water Licence (Licence) MV2025L8-0006 for the Yellowknife City Gold Project (Project) in accordance with the *Mackenzie Valley Resource Management Act* (MVRMA).

The Board conducted a preliminary screening based on the public record for the proceedings. Based on the evidence provided, the Board is satisfied the screening has been completed according to section 125 of the MVRMA and has decided **not to refer** the changes to the Project to environmental assessment. The Board's Preliminary Screening Determination and Reasons for Decision, as required by section 121 of the MVRMA, is attached.

If the Board does not receive notice of referral to environmental assessment, it can proceed with issuance of Permit MV2025C0015 and Licence MV2025L8-0006 on **December 20, 2025**.

The Board and staff look forward to continued communications throughout the pause period. Please contact Chris Hotson via [email](#) or at (867) 766-7456 with any questions or concerns regarding this letter.

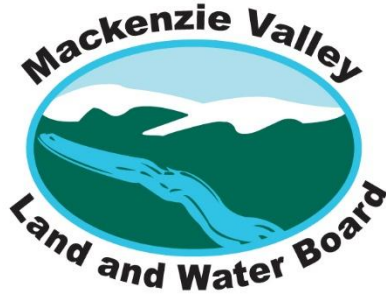
Yours sincerely,

A handwritten signature in blue ink that reads "Tanya MacIntosh". The signature is written in a cursive, flowing style.

Tanya MacIntosh
Chair, Mackenzie Valley Land and Water Board

BCC'd to: Akaitcho Distribution List
Ryan Bachynski – Gold Terra

Attached: Preliminary Screening Determination and Reasons for Decision



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Preliminary Screening Determination and Reasons for Decision

Water Licence and Land Use Permit Applications	
File Number	MV2025L8-0006, MV2025C0015
Company	Gold Terra Resource Corp.
Project	Yellowknife City Gold Project
Location	Sqo`mbak`è/Yellowknife, NT
Activity	Mineral Exploration
Date of Decision	December 4, 2025

1.0 Decision

In accordance with subsection 124(1) of the [Mackenzie Valley Resource Management Act](#) (MVRMA), the Mackenzie Valley Land and Water Board (MLWB or Board) met on December 4, 2025, to make a preliminary screening determination on the renewal Applications from Gold Terra Resource Corp. (Gold Terra) (Applicant) for Land Use Permit MV2025C0015 (Permit)¹ and Water Licence MV2025L8-0006 (Licence)² for the Yellowknife City Gold Project (Project).³

The Board has determined that some Project activities and areas are exempt from preliminary screening because they were previously screened. However, the Applicant has proposed a new activity and Project areas that required to be screened. The Board has decided not to refer these proposed changes to the Project to the Mackenzie Valley Environmental Impact Review Board (the Review Board) for Environmental Assessment because, based on the evidence, it is the Board’s opinion that the proposed

¹ See MVLWB Online Registry (www.mvlwb.com) for [Gold Terra – Type A Permit Application – Jul9 25](#).

² See MVLWB Online Registry for [Gold Terra – Type B Licence Application – Jul9 25](#).

³ The Project is the Yellowknife City Gold Project which is the proposed development, where “development” is defined in Part 5 of the [MVRMA](#) as:

“any undertaking, or any part or extension of an undertaking, that is carried out on land or water and includes an acquisition of lands pursuant to the *Historic Sites and Monuments Act* and measures carried out by a department or agency of government leading to the establishment of a park subject to the *Canada National Parks Act* or the establishment of a park under a territorial law.”

changes to the Project will not have a significant adverse impact on the environment or be a cause of public concern.

The Board’s determinations, including reasons for its decisions, are detailed in sections [3.0](#) and [4.0](#).

2.0 List of Defined Terms and Acronyms

Applicant/Gold Terra	Gold Terra Resource Corp.
Applications	The complete application package submitted by the Applicant for Water Licence MV2025L8-0006 and Land Use Permit MV2025C0015.
Board	Mackenzie Valley Land and Water Board
GNWT	Government of the Northwest Territories
GNWT-ECC	Government of the Northwest Territories-Environment and Climate Change
GNWT-PWNHC	Government of the Northwest Territories-Prince of Wales Northern Heritage Centre
Licence	Water Licence MV2025L8-0006
LWBs	Land and Water Boards of the Mackenzie Valley
MVLWB or Board	Mackenzie Valley Land and Water Board
MVRMA	Mackenzie Valley Resource Management Act
ORS	Online Review System (www.new.onlinereviewssystem.ca)
Permit	Land Use Permit MV2025C0015
Project	Yellowknife City Gold Project, which is the proposed development (as defined in Part 5 of the MVRMA).
Review Board	Mackenzie Valley Environmental Impact Review Board
Standard Licence Conditions	LWB Standard Water Licence Conditions Template
Standard Permit Conditions	LWB Standard Land Use Permit Conditions Template
TK	Traditional Knowledge
YKDFN	Yellowknives Dene First Nation

3.0 Background and Scope of Screening

Project History

Gold Terra currently holds Permit MV2018C0023⁴ and Licence MV2018L2-0006⁵ for the Yellowknife City Gold Project (Project). The Project is a mineral exploration project, including diamond drilling and associated activities, immediately adjacent to the City of Yellowknife.

Description of Application

On July 9, 2025, Gold Terra submitted Renewal Applications for the Project, including the following documents:

- Water Licence Application Form;⁶

⁴ See MVLWB Online Registry (www.mvlwb.com) for [Gold Terra – Approval – Amendment – Feb9 22](#).

⁵ See MVLWB Online Registry for [MV2018L2-0006 – TerraX Minerals Inc – Type B Water Licence – Mar22-19](#).

⁶ See MVLWB Online Registry for [Gold Terra – Type B Licence Application – Jul9 25](#).

- Land Use Permit Application Form;⁷
- Engagement Log;⁸
- Engagement Plan Version 1.1;⁹
- Waste Management Plan Version 2.1;¹⁰
- Spill Contingency Plan Version 1.1;¹¹
- Closure and Restoration Plan Version 1.1;¹²
- Closure Cost Estimate;¹³
- Project Description;¹⁴
- Exploration Plan;¹⁵
- Water Usage Details;¹⁶
- Waterbodies Information;¹⁷
- Archaeological Change Find Procedures;¹⁸ and
- Wildlife Management Plan¹⁹
- Acceptance of Waste – City of Yellowknife²⁰
- Acceptance of Waste – KBL Environmental²¹

As discussed in the Exploration Plan, the Project boundary is approximately 836 km² and Gold Terra's mineral tenure is comprised of 167 claims and 162 mineral leases.

Since signing an Option Agreement with Newmont Corporation in 2020 for mineral claims and leases located at Con Mine in Yellowknife, Gold Terra's primary focus has been to delineate gold resources at this location, with ongoing efforts to delineate gold elsewhere within the Project boundary. Gold Terra will use existing infrastructure including highways and established winter road networks to access drilling sites, as well as helicopters. The diamond drill programs for the Project are expected to drill 40 to 80 drill holes with 1 to 6 drills operating under winter conditions and 1 to 9 drills operating under summer conditions. Gold Terra plans for winter programs from January to mid-April each year, and drill sites with year-round road access would possibly allow for year-round drilling at certain sites.

No camp facilities are required for the majority of exploration activities that are near Yellowknife. However, temporary and permanent camp facilities will be required on the far northern portion of the property. Gold Terra has identified five potential campsites in the Application. Gold Terra noted that use

⁷ See MVLWB Online Registry for [Gold Terra – Type A Permit Application – Jul9 25](#).

⁸ See MVLWB Online Registry for [Gold Terra – Type A Permit Application – Engagement Log – Jul17 25](#).

⁹ See MVLWB Online Registry for [Gold Terra – Type A Permit Application – Engagement Plan – V1.1 – Jul11 25](#).

¹⁰ See MVLWB Online Registry for [Gold Terra – Type A Permit Application – Waste Management Plan – V2.1 – Jul11 25](#).

¹¹ See MVLWB Online Registry for [Gold Terra – Type A Permit Application – Spill Contingency Plan – V1.1 – Jul9 25](#).

¹² See MVLWB Online Registry for [Gold Terra – Type A Permit Application – Closure and Restoration Plan – V1.1 – Jul11 25](#).

¹³ See MVLWB Online Registry for [Gold Terra – Type A Permit Application – RECLAIM Closure Cost Estimate – 6 Drills – Jul9 25](#); [Gold Terra – Type A Permit Application – RECLAIM Closure Cost Estimate – 9 Drills – Jul9 25](#); [Gold Terra – Type A Permit Application – RECLAIM Closure Cost Estimate – 9 Drills and Camp – Jul9 25](#).

¹⁴ See MVLWB Online Registry for [Gold Terra – Type A Permit Application – Project Description – Jul9 25](#).

¹⁵ See MVLWB Online Registry for [Gold Terra – Type A Permit Application – Exploration Plan – Jul9 25](#).

¹⁶ See MVLWB Online Registry for [Gold Terra – Type B Licence Application – Water Usage Details – Jul17 25](#).

¹⁷ See MVLWB Online Registry for [Gold Terra – Type B Licence Application – Waterbodies – Jul17 25](#).

¹⁸ See MVLWB Online Registry for [Gold Terra – Type A Permit Application – Archaeological Change Find Procedure – Jul9 25](#).

¹⁹ See MVLWB Online Registry for [Gold Terra – Type A Permit Application – Wildlife Management Plan – Jul9 25](#).

²⁰ See MVLWB Online Registry for [Gold Terra – Type A Permit Application – Acceptance of Waste City of Yellowknife – Jul31 25](#).

²¹ See MVLWB Online Registry for [Gold Terra – Type A Permit Application – Acceptance of Waste KBL – Jul31 25](#).

of the campsites would depend on exploration results, and that all five campsites would not be used at one time.

Gold Terra plans to store fuel at caches at drill sites and transport fuel with double wall containment tanks mounted on trucks or tractors. Water will be needed for drilling, camp use, and winter road construction from water sources identified in the Application. Waste materials will be transported to Yellowknife waste management facilities daily. Gold Terra provided acceptance of waste letters from the City of Yellowknife and KBL Environmental on July 31, 2025.

Engagement

Gold Terra engaged the parties listed in the most recent version of the Engagement Plan for the Project, which was approved under the current permit MV2018C0023. The Engagement Log²² notes that Gold Terra engaged with the following Parties:

- Akaitcho Treaty 8 Tribal Council
- Akaitcho Interim Measures Agreement Implementation Office
- Tłı̨chǫ Government
- North Slave Métis Alliance
- Yellowknives Dene First Nation (YKDFN)
- Negus Point Residents
- Community Organizations and Recreational Groups, including the Yellowknife Ski Club, Great Slave Snowmobile Association, and Community Dog Musers
- Det'on Cho Group

Emails were sent in March and April of 2025. Of note, YKDFN discussed a Traditional Knowledge Study and encouraged collaboration of such a plan. The Engagement Log noted that Gold Terra and YKDFN met on July 18, 2025, to discuss further.

The Project has previously been screened by the Board under the following authorizations: Permit MV2014C0005,²³ Permit MV2016C0038,²⁴ Permit MV2018C0023,²⁵ and Licence MV2018L2-0006.²⁶

The Applications include proposed changes to the Project. Under Part 1, Schedule 1, section 2.1 of the Exemption List Regulations to the [MVRMA](#), project areas and activities that have already been subject to Part 5 of the MVRMA are exempt from preliminary screening. The new Project areas and activity require screening by the Board in accordance with subsection 124(1) of the MVRMA.

²² See MVLWB Online Registry for [Gold Terra – Type A Permit Application – Engagement Log – Jul17-25](#).

²³ See MVLWB Online Registry for [MV2014C0005 – TerraX Minerals – Preliminary Screening Report – Mar7-14](#).

²⁴ See MVLWB Online Registry for [MV2016C0038 – TerraX Minerals – Issuance – Preliminary Screening Report – Jan17-17](#).

²⁵ See MVLWB Online Registry for [TerraX – Preliminary Screening – Type A Land Use Permit – Jan17-19](#); [Gold Terra – Notification – Preliminary Screening Determination and Notification to Review Board – Dec29-20](#); [Gold Terra – Amendment – Preliminary Screening Determination – Aug25-21](#); [Gold Terra – Preliminary Screening Determination – Feb11-22](#).

²⁶ See MVLWB Online Registry for [MV2018C0023 MV2018L2-0006 – TerraX Minerals Inc – Issuance – Preliminary Screening – Mar7-19](#).

In accordance with paragraph 125(1)(a) of the [MVRMA](#), the Board must conduct a preliminary screening of the proposed changes to the Project to determine and report to the Review Board whether, in its opinion, the proposed changes to the Project might have a significant impact on the environment or might be a cause of public concern. The details of the Board's analysis are set out in section [4.0](#) below.

3.1 Scope of Screening:

Previously Screened or Assessed Areas and Activities

The most recent screening of the Project conducted by the Board on February 11, 2022, includes the previously screened area and scope for the Project.²⁷

The previously screened Project boundary is as follows:

Minimum Latitude: 62° 20' 00"N Maximum Latitude: 62° 58' 00"N
Minimum Longitude: 114° 05' 00"W Maximum Longitude: 114° 32' 00"W

Activities that the Board understands to have been previously considered, and which therefore do not require preliminary screening at this time, are listed below:

- Mineral exploration, including diamond drilling, trenching, and use and storage of explosives;
- Use of equipment, vehicles, and machines;
- Construction and maintenance of winter roads and access roads;
- Use and storage of fuel;
- Construction, operation, and maintenance of camp(s);
- Withdrawal of water;
- Deposit of waste; and
- Progressive Reclamation and associated activities.

New Areas and Activity

In response to a comment from Board staff,²⁸ Gold Terra confirmed that the geographic boundary for the Project has been expanded approximately 10 km to the east to encompass the following recently added mineral claims: M11742, M11743, M11744, M11745, M11746, M11747, M11748, M11749, M11750, M11751, M11752, M11753, M11755, M11760, M11761, M11762, and M11763. The boundary for the current Project and this preliminary screening is shown in Figure 1 of Gold Terra's Exploration Plan.²⁹

Gold Terra also provided additional water sources that will be used for the Project compared to what was previously screened by the Board.³⁰ Therefore, the Board screened the following activity for all water sources to be used for the Project:

- Withdrawal of Water for drilling, camp consumption, and Winter Roads.

²⁷ See MVLWB Online Registry for [Gold Terra – Preliminary Screening Determination – Feb11 22](#).

²⁸ See MVLWB Online Review System for [Gold Terra Resource Corp. – Yellowknife City Gold Project – Type B Licence and Type A Land Use Permit Renewal Applications – July 18, 2025](#) MVLWB 1.

²⁹ See MVLWB Online Registry for [Gold Terra – Type A Permit Application – Exploration Plan – Jul9 25](#).

³⁰ See MVLWB Online Registry for [Gold Terra – Preliminary Screening Determination – Feb11 22](#) and [MV2018L2-0006 TerraX Minerals – Response to MVLWB Information Request – Jan25-19](#).

Gold Terra will use a maximum of 299 m³/day of water from all sources for the withdrawal activities for the Project. In conducting the screening for the above activity, the Board considered all water sources in Gold Terra's response to Board staff comment 1 during the public review of the draft Licence and Permit.³¹

3.2 Public Record and Regulatory Proceeding

To assist the Board in its preliminary screening determination for the Project, the Board distributed the Applications for public review on July 18, 2025, inviting reviewers to provide comments and recommendations on the Applications and the preliminary screening (e.g., on impacts and mitigation measures) using the Online Review System (ORS). Comments were due August 8, 2025, with responses from the Applicant due September 22, 2025. The Board received comments and recommendations from Yellowknives Dene First Nation (YKDFN); Fisheries and Oceans Canada; Environment and Climate Change Canada; Government of the Northwest Territories (GNWT) Department of Environment and Climate Change (ECC); GNWT-Lands Inspector; and GNWT-Prince of Wales Northern Heritage Centre (PWNHC). Board staff also submitted comments and questions for the purposes of clarification.³²

Board staff also circulated a draft Licence and Permit for review following the review of the Applications to allow all Parties the opportunity to comment on the specific wording of the draft conditions. By October 22, 2025, the Board received comments and recommendations on the draft Licence and Permit from the following Parties: YKDFN, Fisheries and Oceans Canada, Environment and Climate Change Canada, GNWT-ECC, and GNWT-PWNHC. Board staff also submitted comments and questions for the purposes of clarification.³³

Since there were no requests to extend the reviewer comment deadlines, the Board is satisfied that a reasonable period of notice was given to affected communities and First Nations, as required by subsection 63(2) of the [MVRMA](#).

Pursuant to Schedule 4.1 of [Northwest Territory Métis Nation \(NWTMN\) Interim Measures Agreement](#),³⁴ the Board determined that written notice was given to the NWTMN and that a reasonable period of time was allowed for NWTMN to make representations with respect to the Applications.

Pursuant to subsection 1.6, paragraphs (a) and (b) of the [Akaitcho Territory Dene First Nations \(ATDFN\) Interim Measures Agreement](#),³⁵ the Board determined that written notice was given to the ATDFN and that a reasonable period of time was allowed for ATDFN to make representations with respect to the Applications.

³¹ See MVLWB Online Review System for [Gold Terra Resource Corp. – Yellowknife City Gold Project – Draft Water Licence and Permit Conditions – Oct 1 25](#) MVLWB 1.

³² See MVLWB Online Review System for [Gold Terra Resource Corp. – Yellowknife City Gold Project – Type B Licence and Type A Land Use Permit Renewal Applications – July 18, 2025](#) MVLWB 1.

³³ See MVLWB Online Review System for [Gold Terra Resource Corp. – Yellowknife City Gold Project – Draft Water Licence and Permit Conditions – Oct 1 25](#).

³⁴ See MVLWB Land Claims, IMAs, and Land Use Plans webpage to access the [Northwest Territory Métis Nation Interim Measures Agreement](#).

³⁵ See MVLWB Land Claims, IMAs, and Land Use Plans webpage to access the [Akaitcho Territory Dene First Nations Interim Measures Agreement](#).

The Board is also satisfied that notice of the Application was provided to the Ghotelnene K'odtjneh Dene (formerly Manitoba Denesuline) and that a reasonable period of time was provided for the Ghotelnene K'odtjneh Dene to make representations to the Board in accordance with section 63 of the [MVRMA](#).

The Board is also satisfied that notice of the Application was provided to the Saskatchewan Denesuline and that a reasonable period of time was provided for the Saskatchewan Denesuline to make representations to the Board in accordance with section 63 of the [MVRMA](#).

4.0 Potential Impacts and Proposed Mitigations

The Board notes that the impacts and mitigations for the additional Project areas described above are the same as for the previously screened activities. Therefore, Table 1 below is specific to the new activity described above. Table 1 summarizes:

- the potential impacts of the proposed change to the Project;
- the concerns that were identified during the regulatory proceeding and how the Applicant addressed those concerns;
- the proposed and potential mitigations for the potential impacts; and
- the Board's analysis of the potential impacts and proposed mitigations.

Table 1: Potential Impacts and Proposed Mitigations for the Proposed Change to the Project

Potential Impact	Activity	Proposed Mitigations <i>Description of measures to reduce potential impacts, including consideration of cumulative impacts and climate change.</i>	Board Analysis and Determination
Water flow or level changes, changes in water quality, changes to aquatic habitat	Withdrawal of Water for drilling, camp consumption, and Winter Roads	<ul style="list-style-type: none"> • The Applicant proposed the following mitigations: <ul style="list-style-type: none"> ○ Gold Terra has provided water sources and surface areas of the water sources and has committed to a maximum ice-covered water use, including for ice-bridge water use, calculated using the LWB Method for Determining Winter Water Source Capacity for Small-Scale Developments.³⁶ ○ In response to a YKDFN comment about water withdrawal impact assessment and reporting, Gold Terra noted that they would notify Fisheries and Oceans Canada if protective measures for fish and fish habitat and standard codes of proactive cannot be met.³⁷ Gold Terra reiterated that no more than 10% of a lake volume will be used during the entire year. Gold Terra agrees to conducting depth verification of lakes, providing a map of water sources, and reporting on under-ice withdrawal. Gold Terra committed to discussing Traditional Knowledge (TK) studies, including of fish, through engagement with YKDFN. • The Board has standard licence conditions that are typically used to mitigate the identified potential impacts. These standard conditions include:³⁸ <ul style="list-style-type: none"> ○ COMPLY WITH SURVEILLANCE NETWORK PROGRAM ○ WATER SOURCE AND MAXIMUM VOLUME ○ LENTIC WATER SOURCE – MINIMUM DEPTH ○ WATER SOURCE DEPTH VERIFICATION ○ MAXIMUM UNDER-ICE WATER WITHDRAWAL VOLUME 	Based on the described mitigations, it is the Board’s opinion that the proposed activities will not have a significant adverse impact on the environment or be a cause of public concern.

³⁶ See MVLWB Online Review System for [Gold Terra Resource Corp. – Yellowknife City Gold Project – Draft Water Licence and Permit Conditions – Oct 1 25](#) MVLWB 1.

³⁷ See MVLWB Online Review System for [Gold Terra Resource Corp. – Yellowknife City Gold Project – Draft Water Licence and Permit Conditions – Oct 1 25](#) YKDFN 1.

³⁸ See the MVLWB Policies and Resources webpage to access the LWB [Standard Water Licence Conditions Template](#).

4.1 Consideration of Potential Impacts

Based on the potential impacts and proposed mitigations identified above in Table 1, the Board considered whether the changes to the Project might have a significant adverse impact on the environment. In general, impacts of the changes to the Project on the environment can be mitigated through the use of standard permit and licence conditions and project-specific conditions established by the Board as per the LWB [Standard Process for Creating New Conditions](#). These conditions may include requirements for management and monitoring plans that provide detailed information regarding the implementation of mitigation measures and the evaluation of their effectiveness.

These conditions may include requirements for management and monitoring plans that provide detailed information regarding the implementation of mitigation measures and the evaluation of their effectiveness.

As discussed above, a draft Licence and Permit were circulated for review during the regulatory proceeding, and all Parties were given the opportunity to provide comments and recommendations on the draft conditions. In finalizing the conditions, the Board will consider all of the evidence provided through the regulatory proceeding.

4.2 Consideration of Public Concern

In addition to considering the potential impacts of the changes to the Project, the Board considered whether the changes to the Project might be a cause of public concern.

Based on the evidence provided during the regulatory proceeding, the Board did not identify any comments or issues that indicate that the Project is a cause of public concern.

5.0 Conclusion

The Board completed the most recent preliminary screening of the Project on February 11, 2022;³⁹ however, the Applications includes proposed changes to the Project. Accordingly, the Board has determined that Project activities that have already been subject to Part 5 of the [MVRMA](#) are exempt from preliminary screening under Part 1, Schedule 1, section 2.1 of the Exemption List Regulations to the MVRMA. The Board has conducted a preliminary screening of the proposed changes to the Project.

The Board has reviewed all the evidence received during the regulatory process with respect to the Preliminary Screening of the proposed changes to the Project. Based on the evidence, it is the Board's opinion that the proposed changes to the Project will not have a significant adverse impact on the environment or be a cause of public concern, as set out in paragraph 125(1)(a) of the [MVRMA](#). The Board has therefore decided not to refer the proposed changes to the Project to Environmental Assessment. If the Board does not receive a notice of referral to environmental assessment by December 19, 2025, the Board can issue the Permit and Licence on December 20, 2025.

SIGNATURE



Tanya MacIntosh, Chair
Mackenzie Valley Land and Water Board

December 9, 2025

Date

³⁹ See MVLWB Online Registry for [Gold Terra – Preliminary Screening Determination – Feb11 22](#).