

GENERAL INSTRUCTIONS FOR EXCEL TEMPLATE:

1. Do not leave blank rows above or between comments.
2. Do not modify or delete the instructions or the column headings (i.e. the grey areas).
3. Each comment must have an associated topic and recommendation.
4. All formatting (i.e. bullets) will be lost when this file is uploaded to the Online Comment Table.
5. If necessary, adjust the cell width and height in order to view all text.
6. Cutting and pasting comments from WORD documents cannot include hard returns (spaces between paragraphs).
7. If you would like to create paragraphs within a single cell, please use a proper carriage return (ALT & ENTER).

<u>TOPIC</u> <i>Be as specific as you think is appropriate; for example a section or page of the document, a recommendation #, general comment, etc.</i>	<u>COMMENT</u> <i>Comments should contain all the information needed for the proponent and the Board to understand the rationale for the accompanying recommendation.</i>	<u>RECOMMENDATION</u> <i>Recommendations can be for the proponent or for the Board. Recommendations should be as specific as possible, relating the issues raised in the "comment" column to an action that you believe is necessary.</i>
Covering letter states that the Security Estimate covers a variety of items bulleted at the bottom of page 1 and top of page 2.	Reclamation Research Plan activities and tasks are not specifically listed in the covering letter. These costs were clearly set out in the approved ICRP and may have evolved further since then, but do not appear any where as line items in the cost estimate.	Dominion Diamond Ekati Corp. (DDEC) should explain where the Reclamation Research Plan activities and tasks are located in the cost estimate. If these have not explicitly been included in some manner, these costs should be added and/or split out.
Covering letter states that the Security Estimate covers a variety of items bulleted at the bottom of page 1 and top of page 2.	It is not clear that regulatory costs related to review and approval of a final Closure and Reclamation Plan, review and approval of final designs and studies, and modifications that may be required to close out the site for final release, have been included. These costs include staff time to prepare and participate in meetings and workshops with interested parties, making changes to designs and documents as a result of stakeholder input and WLWB or other regulator direction.	DDEC should explain where regulatory costs are located in the cost estimate. If these have not explicitly been included in some manner, these costs should be added and/or split out.
Reclamation Security Estimate Report, general comment.	Tables 1-8 provide details on mine component objectives and activities but are inconsistently referenced, if referenced at all, in the text of the report.	DDEC should insert appropriate references in the appropriate text to Tables 1-8.
Reclamation Security Estimate Report, page 1, Introduction.	The ICRP was approved by the WLWB on November 7, 2012, not December 2012 as stated.	DDEC should correct the approval date for the ICRP.

Reclamation Security Estimate Report, bottom of page 2 and top of page 3, Introduction.	The document lists several changes to documents and mine design that have implications for closure planning. None of these were mentioned in the 2012 Annual ICRP Progress Report. This is the sort of information the Agency had expected to see in the Progress Report.	DDEC should incorporate these items and similar changes to plans and mine design into the next Annual Progress Report.
Reclamation Security Estimate Report, page 5, RECLAIM Cost Estimate Open Pits.	The bulleted items for Littoral Zone construction indicate various percentages but it is unclear how these were calculated and what happens with the remainder of the pit, or blasted material.	DDEC should provide further explanation as to what will happen with the 35% of blasted material around the edge of the pits, and how the volume of substrate and sediment materials was calculated. If there is a separate report by EBA Engineering, that might prove helpful.
Reclamation Security Estimate Report, page 7, RECLAIM Cost Estimate Rock Piles.	All covers on waste rock piles are to be 5 m except for waste or reject kimberlite areas or piles where cover is to be 1 m only. The ICRP appears to suggest a 5 m cover for waste kimberlite storage areas (see page 5-95). No rationale is provided for this difference.	DDEC should provide a rationale for the reduced cover on waste kimberlite areas and may wish to consider a 5 m cover.
Reclamation Security Estimate Report, page 7, RECLAIM Cost Estimate Buildings and Equipment.	Although Table 4 mentions salvage and backhaul as options for this component, there does not appear to be any backhaul costs in Appendices C or D. A Golder Associates 2012 estimate for buildings is mentioned on page 11 but no further information is provided.	DDEC should clarify whether it indeed intends to backhaul any equipment or buildings and if so, what those costs may be. A copy of the Golder Associates 2012 report may prove helpful in understanding how these costs were calculated.
Reclamation Security Estimate Report, page 7, RECLAIM Cost Estimate Post Closure Monitoring and Maintenance.	There does not appear to be any calculated estimates for post-closure maintenance (e.g. due to natural or extreme events or changes in design due to poor performance). No additional information appears in Table 5 or in the table in Appendix D.	DDEC should confirm whether there are maintenance requirements in the post-closure phase and how this should be calculated.
Reclamation Security Estimate Report, page 8, RECLAIM Cost Estimate Chemicals and Soils.	The cost estimate relies on an AANDC RECLAIM estimate for Diavik. There should be spill reports for Ekati that could or should be used to help refine what the reclamation requirements may be.	DDEC should clarify whether spill reports for Ekati can be used to help refine the costs for this reclamation activity.
Reclamation Security Estimate Report, page 9, RECLAIM Cost Estimate Mobilize Fuel.	The costing of fuel for mobilization is discussed in this section but there is no indication of what cost escalation or CPI increase may have been used in any calculations.	DDEC should explain what cost escalation was used, if any, for the entire site or how this may have varied across mine components or activities.
Reclamation Security Estimate Report, page 10, RECLAIM Cost Estimate Interim Care and Maintenance.	A figure is provided based on information from the 2011 RECLAIM estimates for Snap Lake and Diavik but there is no explanation provided as to how this was calculated. The Table in Appendix D provides no further information except a line item.	DDEC should provide some explanation as to how the interim care and maintenance costs were calculated.

<p>Reclamation Security Estimate Report, page 11, RECLAIM Cost Estimate Bonding and Insurance Exclusion.</p>	<p>It is not clear why insurance and bonding costs were not included other than 2011 AANDC RECLAIM estimates for Diavik and Snap Lake did not include this cost. Insurance and bonding may be required for a third party to carry out reclamation and would likely have a small but significant influence on contract bids.</p>	<p>DDEC should provide additional rationale as to why insurance and bonding costs should not be included in this cost estimate.</p>
<p>Reclamation Security Estimate Report, page 12, Cost Estimate Results.</p>	<p>A Sable security amount of \$9,907,172 is found in the Table but the last paragraph on the page refers to Sable security as \$11M.</p>	<p>DDEC should clarify which is the correct figure for Sable security.</p>
<p>Reclamation Security Estimate Report, page 13, Cost Estimate Results.</p>	<p>The last line on the page refers to proposed security of \$233M, but a figure of \$234,697,266 is found on the preceding page and the covering letter refers to \$234.7M.</p>	<p>DDEC should clarify what the total financial security is for the site.</p>
<p>Table 7, page 21, RECLAIM Tank Decontamination, item iii.</p>	<p>This items states that chemical and fuel storage tanks will be cleaned and then landfilled. Objectives for buildings and equipment in Table 4 stresses salvage and backhaul as an option.</p>	<p>DDEC should provide information on landfilling costs versus salvage and backhaul costs for tank demolition.</p>
<p>Appendix B, Figure 1.</p>	<p>This figure is updated from the approved ICRP but still does not show the drainage ditches and/or channels.</p>	<p>DDEC should indicate on this figure where the drainage ditches and/or channels will be located or if not know at this time, indicate so in the legend.</p>