

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).

<p><u>TOPIC</u></p> <p><i>Be as specific as you think is appropriate; for example a section or page of the document, a recommendation #, general comment, etc.</i></p>	<p><u>COMMENT</u></p> <p><i>Comments should contain all the information needed for the proponent and the Board to understand the rationale for the accompanying recommendation.</i></p>	<p><u>RECOMMENDATION</u></p> <p><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></p>
<p>Recommendations from prior Seepage Reports and Follow-up</p>	<p>Each year SRK makes a few recommendations in the annual Waste Rock Seepage Report. Some of these get carried through from year to year, others get added or removed. There is no follow-up discussion as to what happens with these recommendations from either SRK or BHPB that the Agency could locate. On November 28, 2006 the WLWB directed BHPB to provide a tracking sheet as part of the covering letter that summarizes any results that require changes to the Waste Rock and Ore Storage Management Plan (see http://www.mvlwb.ca/Boards/WLWB/Registry/2003/MV2003L2-0013/Reports/MV2003L2-0013%20-%20Assorted%20Plan%20Reviews%20and%20Submission%20Schedule%20-%20Nov28%2006.pdf).</p>	<p>It would be helpful if, in the cover letter to the WLWB and/or the report itself, there was a summary of previous recommendations, whether they are being implemented or not, if not why, and how the results may change the Waste Rock and Ore Storage Management Plan. This action is consistent with the concept of adaptive management.</p>
<p>Residual Kimberlite Waste at Misery (page 86)</p>	<p>In both the 2011 and 2012 reports, SRK recommends relocation of the residual kimberlite waste in the Misery Temporary Kimberlite Ore Storage Area and Waste Rock Storage Area as it is currently affecting water quality draining into Cujo Lake and Desperation Pond. Co-disposal of waste kimberlite with either granite or schist apparently causes 'significant' deterioration of water quality at Misery, including elevated uranium leaching in the case with granite.</p>	<p>DDEC should clearly indicate whether the residual kimberlite waste at Misery has been removed. If the kimberlite waste was removed, DDEC should indicate where the new location is and what measures have been taken to prevent further water quality issues at the new site.</p>
<p>Fox Waste Rock Pile, Seep 302 (pages 47, 53 and 87)</p>	<p>The low-grade ore stockpile in the northwest portion of the Fox WRSA is also apparently affecting seep quality (SSEP 302), and SRK recommends investigation of this area (page 87).</p>	<p>DDEC should describe what investigations it intends to carry out to investigate the deteriorating water quality of SEEP 302.</p>

<p>Non-halogenated volatiles and hydrocarbons in Coasre Kimberlite Rejects Area (pages 26, 29, 30 and 87)</p>	<p>Non-halogenated volatiles and hydrocarbons have been showing up in seepage from the Coarse Kimberlite Rejects Area for the past year or two (SSEP 12, 348 and 371), and SRK recommends investigation of this issue (page 87).</p>	<p>DDEC should describe what investigations it intends to carry out on non-halogenated volatiles and hydrocarbons in the Coarse Kimberlite Rejects Area.</p>
<p>Thermal Monitoring Results and Recommendations (Appendix 3, pages 8-9)</p>	<p>The thermal monitoring conducted by EBA shows results consistent with past years. Panda/Koala waste rock dumps and toe-berms are internally frozen, although two of the berm stations show general warming patterns. The Fox Waste Rock Storage Area remains internally non-freezing (reason unknown), although the toe-berms are frozen. The Coarse Kimberlite Reject Storage Area remains unfrozen. Misery waste rock dump is also internally frozen. With respect to Fox, EBA notes that 'thermal conditions in the Fox WRSA are recognized as a possible issue with respect (to) long-term waste rock pile performance', and recommends that continued monitoring data be 'used to develop long-term planning for the Fox WRSA'. This is a new and significant acknowledgement that there may be closure issues with respect to Fox. It is not clear what follow-up work DDEC intends to take with regard to large portions of waste rock piles and the Coarse Kimberlite Rejects Area not freezing as planned.</p>	<p>DDEC should clearly indicate how it intends to respond to the issue of unfrozen waste rock piles. Given that this issue has not been addressed over several years, the Board may wish to direct that proper investigations, assessment and planning work is undertaken now. This ideally would include a risk assessment that discusses the implications of unfrozen Fox rock on surface in a post-closure situation.</p>
<p>Adequacy of Thermal Monitoring Program (Appendix 3, pages 2-7)</p>	<p>Several of the originally installed temperature cables are no completely longer functional (GTC 1534, 1606 and 1466/1541). The significance of this is unknown--how representative is the coverage of temperature profiles with the existing installations?</p>	<p>The Board should consider directing DDEC to prepare a report on the adequacy of the existing thermal monitoring program and what steps DDEC intends to take to address the current lack of thermal monitoring.</p>