

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>	<u>COMMENT</u>	<u>RECOMMENDATION</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>	<i>Comments should contain all the information needed for the proponent and the Board to understand the rationale for the accompanying recommendation.</i>	<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>

Item Number	Topic	Comment	Recommendation
1	Lack of References: pg. 9, 14, 19.	DDEC refers to work it has done but in many cases there are no references provided to that work. For example, at the bottom of page 9 it states "The overall result of the additional field and modelling study showed that water can safely be pumped from the LLCF without creating impacts to aquatic species" without providing a reference to that work found at http://www.mvlwb.ca/Boards/WLWB/Registry/2012/W2012L2-0001/W2012L2-0001%20-%20Ekati%20-%20CRP%20-%202013%20Annual%20Progress%20Report%20-%20Supplemental%20Information%20-%20Sept%2015_14.pdf	DDEC should provide full references for work or results that it uses or cites in the ICRP Progress Report

2	Report Purpose: s. 1.2 Report Purpose, pg. 1	While the Report references the water licence, Part K, Item 4, further direction was provided by the WLWB in its letters dated June 28, 2013 (reasons for delays are to be provided, changes in research direction should be documented) and April 14, 2014 (add two columns to the Reclamation Research Schedule to show the original schedule date and new target deadlines, security and relinquishment section to be added).	DDEC should be directed to include and track the additional direction provided by the WLWB to ensure that each subsequent Report conforms to the new requirements. DDEC should consider providing a concordance table to show how the additional requirements have been met.
3	Life of Mine Plan: s. 3 Mine Scheduling, pg. 5-6	DDEC states that the Ekati Mine is scheduled to operate until 2019. The company issued a news release on July 21, 2014 that states: "Under this mine plan, Ekati will cease mining operation in fiscal 2020" http://www.ddcorp.ca/investors/news-single?id=1949118 . A schedule with the features of the ICRP Reclamation Schedule (Figure 8.5-1) that shows each mine component and the general reclamation activities would be much more helpful than the descriptive text on pages 5 and 6.	DDEC should clarify the actual predicted end year of production at the Ekati Mine. DDEC should submit an updated Life of Mine Plan similar to that found in the ICRP Figure 8.5-1 and provide any necessary explanation of changes. Such an updated Life of Mine Plan should be required in all future ICRP Progress Reports.

4	Beartooth Pit Water Quality Data: s. 4.2.2 2014 Pit Lakes Research, pg. 10	DDEC states that “operational water quality data and depth to PK solids measurements were obtained for Beartooth Pit”. This work is to continue in 2015 but no data or summary of the results from 2014 are provided. It is not clear what data were collected or when or how it will be released.	DDEC should be directed to submit the results of the 2014 Beartooth Pit water quality data and the depth to PK solids without delay. DDEC should make a more consistent effort to report the results of pit water quality monitoring data in future ICRP Progress Reports.
5	Old Camp Closure Water Quality Monitoring: s. 5.1 Old Camp Reclamation, pg. 13	DDEC states that it plans to complete water quality monitoring in 2015 to ensure performance of the completed reclamation activities or the Phase I Pond. It is not clear whether there was any water quality monitoring in 2014, where the monitoring is taking place, what is being monitored and when.	DDEC should provide the results of any Old Camp Closure water quality monitoring conducted in 2014 and what the plans are for completing the work in 2015, including where the monitoring is taking place, what is being monitored and when.
6	Lynx Pit Reclamation: s. 6.2.1.2 Open Pit Reclamation, pg. 18	It is not clear whether DDEC intends allow and facilitate fish passage in the Lynx Pit, whether shallow zones will be created and whether these areas will be revegetated. The Agency is of the view that fish access should be provided and that the creation of shallow zones should be included as part of the ICRP, just as they are for other pits.	DDEC should clearly articulate the closure objectives and activities it intends to carry out at the Lynx Pit. These should include fish access and the creation of shallow zones.

7	Wildlife Access and Slope of Pigeon Waste Rock Pile: s. 6.2.2 2014 Pigeon WRSA Closure Design, pg. 19	DDEC state: “Additionally based on the final design of flatter slopes the construction of access ramps for caribou for the Pigeon WRSA will not be required” but provides no evidence that wildlife will be able to safely access the Pigeon Waste Rock Storage Area or how it compares to other waste rock piles at the site that will require wildlife ramps. The slopes proposed for Pigeon are 2H:1V, quite steep. There is no information in the ICRP or the original Reclamation Research Plan 8 (WRSA Access Ramps) on the design of the ramps.	DDEC should provide a proper comparison of the design of the Pigeon Waste Rock Storage Area to the other waste rock piles at the site that will require wildlife access ramps. DDEC should also provide some evidence that wildlife will be able to access the Pigeon Waste Rock Storage Area as designed.
8	Monitoring of Pigeon Waste Rock Pile Cover: s. 6.2.2 2014 Pigeon WRSA Closure Design, pg. 19	The Pigeon Waste Rock Storage Area is to be closed with a different cover design than any of the other waste rock piles at the Ekati Mine. No specific post-closure monitoring (including seepage and thermal monitoring) or maintenance appears to be included to ensure that the cover is performing as predicted.	DDEC should provide an explanation of how it intends to monitor the Pigeon Waste Rock Storage Area and include an appropriate amount in the RECLAIM cost estimate for such monitoring and contingencies.

9	Misery Power Line Reclamation: s. 6.2.3.2 Misery Power Line Reclamation Strategy, pg. 20 and s. 7.2.2.5 Misery Power Line Reclamation pg. 26	DDEC provides very little information on the actual fate of the various components of the Misery Power Line including wires, poles, and guy wires. DDEC estimates the total cost of the Misery Power Line reclamation as a lump sum of \$65,500 which seems to be exceedingly low given that the construction anticipated in the original land use permit application was predicted to take a crew of 10-20 people over two field seasons for over 200 poles.	DDEC should provide more details on the fate of the various components of the Misery Power Line including the wires, poles and guy wires. DDEC should provide additional justification for its lump sum reclamation cost of \$65,500 for the Misery Power Line.
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10	Cover for Landfill in the Panda-Koala-Beartooth Waste Rock Pile: s. 6.2.4.1 2013 Landfill Capping Closure Objective, pg. 20-21 and Table 7.2-1	DDEC intends to reduce the cap depth for the portion of the Panda-Koala-Beartooth waste rock pile where the landfill is located. The new cap depth is to be 1 m compared to the surrounding areas that contain mixed rock types (see ICRP Figure 5.4-6) where the cover objective is encapsulation to prevent Acid Rock Drainage. It is not clear how DDEC intends to slope or provide for a transition from the areas requiring the 5 m cover to the proposed 1 m cover. It is also not clear whether a “sink” will be created in the area of the landfill where snow and precipitation may accumulate and affect the thermal protection that is required for encapsulation of the mixed rock types in adjacent areas.	DDEC should explain how it intends to slope or provide for a transition from the areas requiring the 5 m cover to the proposed 1 m cover on the Panda-Koala-Beartooth Waste Rock Storage Area. DDEC should explain whether a “sink” will be created in the area of the landfill where snow and precipitation may accumulate and how this affect the thermal protection that is required for encapsulation of the mixed rock types in adjacent areas. DDEC should clearly indicate how it intends to monitor snow and precipitation infiltration in the landfill area and how the permafrost encapsulation of adjacent areas may be affected.
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11	Incremental Costs for Post-Closure Monitoring: Table 7.2-1 RECLAIM Estimate Update Tracking Table, pg. 24 and Appendix F 2014 RECLAIM Estimate, Post-Closure Monitoring and Maintenance, pg. 24	DDEC does not propose any incremental or additional post-closure monitoring and maintenance costs for the addition of the Lynx Project and the Pigeon Pit to the overall Ekati Mine cost estimates. Lynx is a distinct project at a different location and would entail additional time for travel by staff or contractors, additional costs for surveys and analysis of samples and reporting, yet no changes are proposed to the Table of the RECLAIM cost estimates. This is not a reasonable assumption given that there should be air quality, wildlife effects, pit water quality and site vegetation monitoring and maintenance associated with the Lynx Project. One might reasonably expect to see a 20% increase given that the other five pits (Panda, Koala, Beartooth, Misery and Fox) make up the post-closure monitoring and maintenance costs predicted to date.	DDEC should estimate the incremental or additional costs for post-closure monitoring and maintenance costs associated with the Lynx Project and the Pigeon Pit, and include these in its RECLAIM estimate.
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12	Accommodations Cost Post-Closure: s. 7.2.2.2 Accommodations, pg. 25	DDEC has used a figure of \$1,481.19 (or \$1,491.19 as noted earlier in the same paragraph and \$1,483.19 as shown in the Unit Cost Table in Appendix F, g. 31) per person-month. This figure is low, even lower than the RECLAIM unit cost of \$3,041.67. DDEC has not provided any detailed rationale for its selection of a much lower unit cost. The company also claims that “camp size and corresponding costs for running the camp due a much lower level of effort required to complete the pit flooding program”. Given that the camp may be seasonal in nature and require an annual mobilization and demobilization and a much smaller operation over which fixed costs will be spread, the rationale does not appear to be strong.	DDEC should provide additional rationale and detailed calculations for its selection of a unit cost for accommodations that is less than half the RECLAIM unit cost. DDEC should also provide further information on the operation of the post-closure accommodations including requirements for annual mobilization and demobilization and how fixed operational costs will be spread out over a smaller work force for post-closure.
13	Pit Revegetation Costs: s. 7.2.2.4 Lynx Project, pg. 26 and Appendix F RECLAIM Cost Estimate (Pit #9 sheet, see other sheets as well)	The revegetation costs for the Lynx Pit (and all other pits) is set at \$4,000. It is not clear what could reasonably be accomplished for such a low figure.	DDEC should provide an explanation of what is entailed with the revegetation costs associated with \$4,000 for the Lynx and other pits in terms of revegetation.
14	Reclamation Research Schedule: Appendix C, Plan 4.2 – Task 9, pg. 13	This Task has been deleted with minimal justification and no apparent consultation with stakeholders.	DDEC should provide additional justification for the deletion of this Task.

15	Reclamation Research Schedule: Appendix C, Plan 3.1 – Task 8, pg. 9 and Plan 4.5 – Tasks 4 and 5 (as shown on Table C-1, on pg. 25)	These Tasks have been added and there is a minimum of information in the Progress Report available regarding these Tasks.	DDEC should provide a detailed scope of work for these Tasks given that they are “within 3 years of implementation”.
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16	Vegetation Sustainability Criteria: Appendix C, Plans 7.3, 7.4 and 7.5 and Table C-1, pg. 24-25.	<p>The Agency is very concerned with the lack of progress to determine the sustainability of the revegetation. Moreover, Table C-1 (Appendix C) shows that this research plan (7.5 Closure Criteria for Enhancement of Natural Recovery <i>Task 1 - Identify Closure Objectives and Criteria That Demonstrate Recovery</i>) has been extended for three more years. While the Agency understands the importance of the other revegetation research, failure to figure out whether the revegetation is temporary or permanent has serious consequences: the time for closure monitoring needs to be extended to decades. For example, Culvert Camp revegetation studies show that, after 10 years (2003 to 2013), the plants placed there are not doing well and more planting and more fertilizer were needed (Progress Report, Appendix D, pg. 2-11 and 2-12). (Note that fertilizer promotes growth but delays the determination of whether the plants will survive without perpetual care – sustainability.) Given the uncertainty over revegetation success and the delay in determining measures of sustainability, there may need to be a corresponding change in the ICRP monitoring schedule to accompany the continuing lack of progress. The assumptions regarding how long vegetation monitoring should be expected to continue were based, in part, on the belief that this reclamation Research Plan would be completed. It will not; hence a much longer time should be used. This may have consequences for the Water Licence security.</p>	<p>DDEC should provide a fuller explanation of the lack of progress towards clear, measurable revegetation sustainability criteria. DDEC should re-evaluate the post-closure monitoring period required for revegetation and build in appropriate contingencies and costs as part of RECLAIM give the uncertainty over this key aspect of closure.</p>
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17	General Comments on Appendix C: Appendix C and Table C-1	DDEC did not provide an update on the Reclamation Strategy Plans as shown on Table 4.1-2 (pg. 8) that were formerly referred to as Engineering Studies in the ICRP. DDEC did not add the two columns to Table C-1 as directed by the WLWB in its letter of April 14, 2014 that should show the original completion dates for the Reclamation Research Plans and the new completion dates as contemplated in the current Progress Report.	DDEC should provide an update as to the progress and status of the Reclamation Strategy Plans. DDEC should revise Table C-1 to show the original completion dates for the Reclamation Research Plans and the new completion dates as contemplated in the current Progress Report.
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