

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	2. Current Nitrogen Sources and Management Practices, pg. 7-8	In tables 1 and 2 the total discharge volumes for Feb to June and Oct 2013 are inconsistent. For example, values for Feb are 173,614, 000 L (table 1) and 416,076 m3 (table 2).	The total discharge volumes for Feb to June and Oct 2013 should be corrected to ensure consistency.

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2	2. Current Nitrogen Sources and Management Practices	<p>While there is some useful information presented in this section, the Agency had expected to see a mass balance model, much like that presented for water and waste as presented by the company in its Annual Report (see page 10 of the 2012 Annual Report). In this way, the company would be able to show systematically the sources, pathways and final disposition of the nitrogen brought to the site. This cradle to grave approach would also be used to identify those opportunities for the greatest gains in reducing nitrogen use at the site. For example, there is no information presented on nitrogen losses during original transport or storage to the drill sites (see comment below). A mass balance model approach would also facilitate monitoring and public reporting.</p>	<p>DDEC should prepare a mass balance model for the nitrogen that it brings to the mine site to ensure there is a better understanding of the best opportunities for waste reduction and to support monitoring and public reporting.</p>
3	2.4 Current Trends and Management Practices, pg. 8	<p>The company states that “Nitrogen trends at the Ekati Diamond Mine are regularly assessed and monitored through internal monitoring programs” but there are no explanations of the internal monitoring programs.</p>	<p>DDEC should describe its internal monitoring programs for nitrogen, present the results and present any modifications it intends to make as part of the Nitrogen Response Plan.</p>

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4	2.5.2 Nitrogen Release Control Practices, pg. 12	DDEC mentions an “Aquatic Effects Synthesis Study” as “currently ongoing” but provides few details.	The company should provide further details on the Aquatic Effects Synthesis Study and its relevance to the Nitrogen Response Plan. It would also be helpful to know when the Study will be completed and whether DDEC intends to release it publicly.
5	2.5.2 Nitrogen Release Control Practices, pg. 13	It is also not clear how DDEC monitors the use of explosives and its blasting practices or compliance with whatever practices or policies that may exist.	DDEC should provide on how it monitors its blasting practices, and how this information is used for adaptive management.
6	4. Implementation Plan, pg. 14 and 7.0 Recommendations (Golder Report) pg. 32	The section does not address all the recommendations contained in the 2013 Golder Report (including an educational program, operational reviews, and some new blast diagnostics techniques) nor does it fully address the requirements of the water licence Schedule 8, Item 5 c) on implementation. It is not clear whether the company accepts all of these recommendations, when it intends to implement them and how it will measure and report its performance. The Agency had expected to see details on public reporting of the company’s use of nitrogen and the effectiveness of its waste reduction efforts reported at least annually through the Water Licence Annual Report.	The Implementation Plan should be revised to clearly respond to each of the Golder recommendations. DDEC should indicate: (1) whether it accepts the recommendation or not; (2) provide justification of the selected actions to minimize nitrogen losses, which may include a cost/benefit analysis; (3) include a description of timelines to implement the selected actions; and (4) provide details on how it will measure and report on the effectiveness of actions and plans to further revise the Nitrogen Response Plan as required.

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7	3.2 Open Pit Blasting Practices (Golder Report)	On page 15 is a statement to the effect that “While spending time with the blasting crew, it became apparent there may be a lack of continuity not only between the drilling and blasting teams but also engineering and operations. Without someone managing both the drill and blast operation, issues could arise.”	DDEC should indicate how this matter will be addressed.
8	3.3.1 Underground Production Blasting (Golder Report)	For both Koala North and Koala Underground Mines, a paper audit was conducted based on written procedures for the mine. While written procedures are important, so is an audit of actual practices in the field to ensure that all procedures are being implemented.	DDEC should indicate when a field audit of these practices will be conducted and a report prepared.
9	4.0 Sources of Nitrate in the Site Drainage Water (Golder Report), pg. 21	The report indicates that “A detailed assessment of spillages that might occur during transportation and handling of explosives on site was not carried out by Golder during the site visit.” While the report goes on to note that “it is understood that the processes and procedures have been well established and are effective.”	DDEC should provide information on any field audits of these practices and procedures that have been or will be completed.

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10	4.1.1 Open Pit Blasting (Golder Report)	On page 23 and Appendix B, Golder provided a blast analysis for an open pit blast. Some concerns were raised around the possibility for incomplete detonation.	DDEC should indicate how it has addressed or intends to address these concerns.
11	4.1.2 Underground Production Blasting (Golder Report)	Pages 23 and 24 list “the major potential sources of nitrate from underground production blasting that will likely be dissolved by mine drainage water”.	DDEC should indicate how it has addressed or intends to address these issues.
12	6.0 Conclusion (Golder Report), pg. 27	The report highlights a number of 2008 recommendations which have been implemented by Ekati. The report also notes that “the most significant potential for improvement in minimizing the availability of explosive product available for dissolution by the mine drainage water can be realized by continuing to improve the usage practices in the open pits. This can potentially be achieved by minimizing blasthole malfunctions and misfires.”	In developing its implementation plan (Section 4), DDEC should clearly indicate how it intends to address this conclusion.