



INDEPENDENT ENVIRONMENTAL MONITORING AGENCY

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August 3, 2007

Violet Camsell-Blondin
Chairperson
Wek'eezhi Land and Water Board
Box 32
Wekweti NT X0E 1W0

Dear Ms. Camsell-Blondin

Re: Aquatic Effects Monitoring Program Lake Sampling Reduction Proposal

In response to an e-mail from Sarah Baines for comments on BHP Billiton's (BHPB's) proposed reduction in lake sampling, the Agency is pleased to submit the following observations and comments.

While we appreciate the efforts of BHPB and Rescan in justifying a change in sampling strategy for lakes as part of the Aquatic Effects Monitoring Program (AEMP), the Agency is of the view that there is insufficient information available at this point to make a sound decision. The Agency is not opposed in principle to a reduction and we have in fact often advocated that the company focus its resources on what is important.

With regard to the analysis undertaken by Rescan in BHPB's July 20, 2007 letter, we noted that of the variables selected, none were metals. The Agency is aware that some metals have shown a marked increase in concentration downstream of the LLCF and suggests that one or two metals should have been included in the analysis by Rescan. It is also not clear to us what methodology was used for the analysis and we suggest that BHPB provide such details.

As the summer sampling season for 2007 is almost at an end, we do not believe there is any advantage to a quick decision on the reduction in sampling frequency. The Agency believes that the study BHPB has under way on variability, particularly the component dealing with what constitutes a valid replicate for the purpose of representing within-lake variability, is required to make a fully informed decision on the reduction in lake sampling frequency. We note that BHPB volunteered to undertake this work and report on it to the WLWB in February 2008. The WLWB accepted this proposal and the Agency is of the view that this is the appropriate process for considering changes in lake sampling frequency.



To support the reduction in lake sampling frequency, BHPB may wish to consider taking three replicate within-lake samples this month, August 2007, for selected AEMP lakes, in addition to the already approved sampling protocol. These additional samples should give BHPB some further data to test the desirability of moving to a reduced sampling frequency.

In conclusion, we trust that you will find our comments constructive and helpful as we work together to maintain good water quality downstream of Ekati now and for future generations.

Sincerely,

-ORIGINAL SIGNED BY-

Tim Byers
Vice-Chairperson

cc. Society Members
 Laura Tyler, BHPB
 Bruce Hanna, DFO