



INDEPENDENT ENVIRONMENTAL MONITORING AGENCY

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February 8, 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 Plan for 2007-2009

As requested by your staff on January 11, 2007, the Independent Environmental Monitoring Agency is please to provide the following comments on BHPB's proposed Aquatic Effects Monitoring Program (AEMP) for 2007-2009.

We commend BHPB for undertaking the multivariate analyses of the data collected under the AEMP, as recommended by our Agency for some time. This work has demonstrated that there are links between changes to downstream water quality and changes in zooplankton populations.

We sent a letter to BHPB directly with our initial observations and concerns on December 15, 2006. We are pleased to see that many of these matters were properly addressed and resolved. The Agency has a few matters that need to be reiterated in this letter.

The Agency is of the view that the scope of AEMP re-evaluation should not have been limited to the methods for collecting data but should also have involved the results observed, and some discussion of which water quality variables are being analysed and reported on in the AEMP, a major topic during the previous review of the AEMP in 2003. For this reason, we feel it is essential that the results of the LLCF water quality studies be available for the WLWB to conduct a proper review of the proposed AEMP for 2007-2009. For example, should the LLCF water quality study predict a significant increase in a water quality variable not now being analysed and reported on annually, it would be appropriate to add that variable to the analysis and reporting in the AEMP for 2007-2009. We wish to make sure that the right variables are being monitored for changes, and had expected to see some consideration of expanding the monitored variables to include those from the PC-1 group responsible for much of the change to water chemistry down stream of the mine.



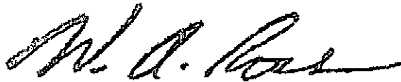
We encourage BHPB to complete and submit the LLCF water quality studies as soon as possible to allow the WLWB, the Agency, and others, to conduct an informed and timely review of the proposed AEMP for 2007-2009.

Time-of-travel from the LLCF to Lac de Gras or the number of times each lake is flushed per year on an annual basis, at peak discharge, and during times of no discharge, would be helpful to assist in the interpretation of downstream water quality throughout the year. Time-of-travel data would assist in explaining downstream water quality data which could otherwise be regarded as anomalous and discarded.

The Agency remains interested in hearing more about how BHPB intends to comply with the new water licence requirement for cumulative effects assessment on Lac de Gras (Part I, section 3 (h)), and whether there has been any consideration of changes to the AEMP to ensure an improved understanding of any potential effects on Lac de Gras.

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,

A handwritten signature in black ink, appearing to read "W. A. Ross".

Bill Ross
Chairperson

cc. Society Members
Brent Murphy, BHPB
Jason Brennan, DIAND Water Inspector