



Independent Environmental Monitoring Agency

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

Dear Ms. Camsell-Blondin

Re: Comments on Section 3 of the Ekati Interim Closure and Reclamation Plan

The Agency is pleased to submit the following comments on section 3 of BHPB's Interim Closure and Reclamation Plan for Ekati.

General Comments

Closure criteria need to be discretely measurable to be useful in gauging reclamation success at the end of the day. Some closure criteria in the ICRP fail to identify specific measurable outcomes. There are a number of references to, for example, non-measurable criteria such as 'significant' changes or 'increasing trends' where specific thresholds or early warning signs for management actions ought to be identified.

Stronger links amongst the various tables covering objectives and criteria, research and monitoring would be helpful.

Mine Component Comments

Processed Kimberlite Areas

The ICRP is silent on the difficulties posed for reclamation by the Extra Fine Processed Kimberlite (EFPK), which have been highlighted as substantive issues in the LLCF operational options evaluation and the 2007 Wastewater and Processed Kimberlite Management Plan. The uncertainties about long-term stability of the LLCF ponds bearing this material also have not been identified in the reclamation research summary (Table 46). There is an urgent need to properly identify the research issues associated with slurry reclamation and to proceed with a well-defined program to sort out the appropriate options. One option, as we have urged previously, is storage of the EFPK in a (meromectic) pit lake at closure as a means of better isolating it from the environment.

The research necessary to properly close the LLCF in terms of cover design, construction techniques, revegetation risks to wildlife, and other related research ought to be consolidated into a specific research plan for the LLCF. We are increasingly concerned that the necessary research will not be identified, conducted, coordinated or completed in a way that ensures there are practical methods and answers in time for closure. For example, there is an obvious need for more continued revegetation research (larger scale pilot areas), presumably at the north end of Cell B, as quickly as possible. Specific criteria to measure revegetation success are needed. We have similar concerns regarding the uncertainties of design, construction and long-term stability of a rock cover for portions of the LLCF.

The design and operation of the channels to avoid uncontrolled drainage through the LLCF is an area that requires some priority attention from the company, especially in terms of the long-term integrity of the LLCF.

Dust monitoring related to the LLCF, and other mine components, is a much more significant closure issue in our view than air quality. This issue is not identified in the ICRP. We think that vegetation monitoring is important to build public confidence that there are no residual impacts at closure from dust deposition from Ekati operations.

Dams, Dykes and Channels

It is not clear what the company intends to do with the King Pond and Two Rock Lake sedimentation ponds. There is some reference to potential movement of sediments from King Pond, but no explanation is provided as to why and where the sediments might go and the risks involved.

Buildings and Infrastructure

There are few details provided in this section on how and when BHPB intends to decommission roads. We would like to ensure that there are few, if any, obstructions left on site for caribou and other wildlife movements. Roads need to be classified and specific remediation identified along with timing. We suggest that roads (generally) be broken down to near landscape contour to avoid barriers or filters to wildlife movement post-closure.

There is little information presented on where demolition materials will go and whether there are opportunities for salvaging, recycling, backhauling and reuse of some materials by communities.

Other Comments

The research table summary lacks virtually all reference to the explicit question being addressed by the research, when the research needs to be done, and details about how the research will be undertaken. It is not clear how this research will feed into the next version of the ICRP, or even if it will be completed in time for mine closure. Greater assurance is needed that the research will be done in time to make such ICRP revisions as are appropriate. The research questions, linkages and timing for finalizing strategies for the LLCF are particularly important.

The closure monitoring in Tables 52-54 generally does not include trigger points or thresholds for implementation of contingency measures, including remediation or mitigative actions. These are required to render any adaptive management strategy effective. The ICRP must clearly define specific triggers or thresholds in the monitoring programs. If these are not determinable now, the necessary research should be identified and undertaken at the earliest possible time. Duration of closure and post-closure monitoring programs must be defined by the period over which the closure criteria are achieved and shown to be sustainable. It may be premature to set the duration of these monitoring programs.

Conclusion

BHPB has demonstrated some progress in the conceptual approach to closure but further refinements are recommended, particularly with regard to the LLCF.

We thank the Board for the opportunity to work together on improving the ICRP. Should you have any questions about our comments, we would be pleased to work with your staff and the other interested parties.

Sincerely,

—Original Signed By—

Bill Ross
Chairperson

cc. Society Members
Helen Butler, BHPB
Bruce Hanna, DFO
Anne Wilson, EC
Jason Brennan, DIAND