



Indian and Northern
Affairs Canada

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et du Nord Canada

Water Resources Division
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File: MV2001L2-0008
BHPB EKATI

November 1, 2007

To: Zabey Nevitt
Executive Director
Wek'eezhii Land and Water Board
Box 32, Wekweètì, NT X0E 1W0

Re: Review Comments - BHP's Tundra Soil Study

Indian and Northern Affairs Canada - Water Resources Division (INAC-WRD) has reviewed BHP's Tundra Soil Study conducted by SRK Consulting. INAC-WRD would like to provide the following comments. Although the report is long over due, INAC-WRD would like to commend BHP for the quality of the report. SRK did a good job describing and addressing the issues.

Although the report is clear on the mechanism of how the acid drainage and elevated aluminum levels were created, it does not explain why this appears to be the only location to experience this phenomenon. Considering the fact that this process can potentially occur along the entire base of the waste rock pile, this may be occurring at other drainage locations. With this new information, are there any plans to determine if this is, or is not, happening at other locations around the waste rock piles?

It is now understood that the total dissolved solids (TDS) from the weathering and rinsing of the waste rock led to an influx of calcium, magnesium, sodium, potassium, and sulphate, which displaced the aluminum from the soil. It is explained that eventually an equilibrium will be reached at which point no elevated levels of aluminum will be released. It is estimated in the report that this process of equilibration will take a few decades, although the levels of aluminum should continue to decrease. Considering this long time frame, will any work been done to consider the possible effects of elevated aluminum levels on the surrounding environment, particularly Bearclaw Lake? Furthermore, considering that Bearclaw Lake drains (or is pumped) to the Panda Diversion Channel and eventually Kodiak Lake, bypassing the LLCF, it would seem reasonable that the water quality standards (i.e. EQC's) should be applied.

If you have any questions and/or comments feel free to contact Marc Casas at (867) 669-2664 or via email at casasm@inac-ainc.gc.ca.

Sincerely,

-Original signed by-

Dr. Kathleen Racher
Manager
Water Resources Division