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Angela Love
 Regulatory Officer
 Mackenzie Valley Land and Water Board
 7th Floor, 4922 48th St.
 PO Box 2130, Yellowknife, NT
 Canada, X1A 2P6

March 9, 2016

Re: MV2005L2-0015 Operational Surveillance Network Program Assessment and Concerns.

Dear Ms. Love:

In the process of reviewing and preparing for the execution of the Surveillance Network Program (SNP) under Water License MV2005L2-0015 during Operations, a number of concerns have been noted which require Board clarification and/or action. A summary of SNP stations, concerns and proposed revisions to rectify the issues identified during the review are summarized below in Table 1.

Table 1: SNP Station Concerns and Proposed Changes

Station	Sampling Frequency	Concern	Proposed change
SNP-08 Wastewater Collection Sump – In-line from 5034 Open Pit	Continuously (by in-line monitoring)	<ul style="list-style-type: none"> Infrastructure limitations regarding continuous monitoring of Physical Parameters. Inconsistent flow causing damage to sensory equipment. 	<ul style="list-style-type: none"> Remove physical parameter monitoring due to the fact it is sampled and analyzed weekly/monthly by way of physical sample. Change frequency to “continuously when pumping”
SNP-09 Wastewater Collection	Continuously (by in-line monitoring)	<ul style="list-style-type: none"> Infrastructure limitations regarding continuous monitoring of Physical Parameters. 	<ul style="list-style-type: none"> Remove physical parameter monitoring due to the fact it is sampled and analyzed weekly/monthly by

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Sump – In-line from Hearne Open Pit		<ul style="list-style-type: none"> Inconsistent flow 	<p>way of physical sample.</p> <ul style="list-style-type: none"> Change frequency to “continuously when pumping”
SNP-10 Wastewater Collection Sump – In-line from Tuzo Open Pit	Continuously (by in-line monitoring)	<ul style="list-style-type: none"> Infrastructure limitations regarding continuous monitoring of Physical Parameters. Inconsistent flow 	<ul style="list-style-type: none"> Remove physical parameter monitoring due to the fact it is sampled and analyzed weekly/monthly by way of physical sample. Change frequency to “continuously when pumping”
SNP-11 Seepage Survey – West Mine Rock Pile	Twice a Year (during freshet and late in summer or fall)	<ul style="list-style-type: none"> Flow(*), volume(*) where * denotes flow and volume measurements shall be measured and recorded continuously..... Continuous data cannot be collected during a bi-annual survey or in a seepage/non-catchment area 	<ul style="list-style-type: none"> Presence/absence of seepage flow confirmed during survey. Volume requirement to be removed.
SNP-12 Seepage Survey – South Mine Rock Pile	Twice a Year (during freshet and late in summer or fall)	<ul style="list-style-type: none"> Flow(*), volume(*) where * denotes flow and volume measurements shall be measured and recorded continuously..... Continuous data cannot be collected during a bi-annual survey or in a seepage/non-catchment area 	<ul style="list-style-type: none"> Presence/absence of seepage flow confirmed during survey. Volume requirement to be removed.
SNP-13 Seepage Survey – Fine PKC Facility	Twice a Year (during freshet and late in summer or fall)	<ul style="list-style-type: none"> Flow(*), volume(*) where * denotes flow and volume measurements shall be measured and recorded continuously..... Continuous data cannot be collected during a bi-annual survey or in a seepage/non-catchment 	<ul style="list-style-type: none"> Presence/absence of seepage flow confirmed during survey. Volume requirement to be removed.

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		area	
SNP-14 Seepage Survey – Coarse PKC Facility	Twice a Year (during freshet and late in summer or fall)	<ul style="list-style-type: none">Flow(*), volume(*) where * denotes flow and volume measurements shall be measured and recorded continuously.....Continuous data cannot be collected during a bi-annual survey or in a seepage/non-catchment area	<ul style="list-style-type: none">Presence/absence of seepage flow confirmed during survey.Volume requirement to be removed.

Thank you for your attention to this matter. Should you require additional clarification, please do not hesitate to contact me at your convenience.

Sincerely



Patrick Kramers
Environmental Superintendent

Cc: Andrew Howton, GNWT Lands
Sarah McLean, De Beers