



16 Yellowknife Airport  
Yellowknife, NT. X1A 3T2

Phone: (867) 669-2763  
Fax: (867) 669-2720

File: **MV2001L2-0002**

June 28<sup>th</sup>, 2012.

Willard Hagen, Chair,  
Mackenzie Valley Land and Water Board  
P.O. Box 2130  
Yellowknife, NT. X1A 2P6

**Mackenzie Valley Land & Water Board**

File \_\_\_\_\_

**JUN 28 2012**

Application # MV2001L2-0002  
Copied To MC/Reg

Mr. Hagen:

**Re: De Beers proposal to use the East Cell for a Landfill.  
Snap Lake Mine, Water Licence MV2011L2-0004**

De Beers recently proposed to relocate its land fill operation to the East Cell of the North Pile once the Starter Cell is filled with PK (within the next few months). This raises several concerns, as well as compliance issues, which need to be addressed before this relocation can be approved.

Some background seems in order.

- The Consolidated Project Description (CPD) notes that the landfill was to originally be placed in a portion of the starter cell...it looks to be about 30% of the starter cell area. The E.A.R. (2002) similarly notes that "inert solid waste will be deposited into a small area of the North Pile".
- The C.P.D. also notes that the landfill will be re-established and managed through to closure in the former west cell quarry of the north pile"). So the Water Licence only grants approval of land filling in 2 landfill locations, one in the Starter Cell, and one in the West Cell (through Part A, the Scope).
- No mention of the future relocation of the landfill was made in the most recent approved Domestic Waste and Sewage Management Plan (March, 2010).
- The 2010 OSWRPKMP proposes to relocate the landfill once the Starter Cell is filled with PK to the East Cell. This was approved (though it should be noted that Land fill waste management would have been more appropriate to address in the Domestic Waste Mgt. Plan). This contradicts the intended landfill location condition established in the Consolidated Project Description/EAR process.

My concerns with the use of the East Cell for landfilling include the following:

- Though only inert material is authorized for disposal, the potential to bury materials not approved for landfill does exist. The prudent practice to overcome this challenge & provide future managers with the reasonable chance to recover such material is to select one, definitive area which concentrates such material (and records where/what was buried). This practice of consolidating landfill practices also clearly meets the intentions of the EAR approved project.
- Freezing of the land filled material appears to be a key element towards the objective of ensuring adequate protection of the environment. It's unclear at this time if landfilled material placed into the East Cell as proposed will freeze, and if not, what measures will be taken to contain such leachate. Some sort of commitment on the part of De Beers would seem to be in order which will ensure that landfilled material subjected to slurry deposition will not mobilize & lead to impact the surrounding environment.
- To that end, I'd suggest that the Board consider a recommendation that De Beers consider landfilling so far within the rockpile that there is little chance of seepage ever contacting land fill material and then leaving the rockpile.

As the discussion above shows, the Inspector is uncomfortable with the proposed modification from the C.P.D.. However, if De Beers could meet certain conditions, those concerns would largely be alleviated. Notably:

- A commitment to restrict landfilling to "a small area/portion of the East Cell", which was clearly identified (mapped). Something in the order of 20-30% of the total area would seem reasonable.
- A commitment to ensure landfilled material will not mobilize under the proposed operational conditions and negatively impact the surrounding environment.

At this time I'd like to ask the MVLWB to request that De Beers provide an information submission addressing these issues (and, of course, any additional information it feels it needs) so that we can make an informed but timely response to the proponents proposed modification.

If you have any questions or concerns about this request, please do not hesitate to contact me at (867) 669-2763 or [coveyt@inac.gc.ca](mailto:coveyt@inac.gc.ca).

Sincerely,



Tracy Covey  
Resource Management Officer III,  
South Mackenzie District  
Aboriginal Affairs and Northern Development Canada

cc. *Scott Stewart* (Aboriginal Affairs and Northern Development Canada)  
*Marc Casas* (Mackenzie Valley Land & Water Board)