

# DE BEERS

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December 19, 2013

File: L020

Willard Hagen, Chair  
Mackenzie Valley Land and Water Board  
PO Box 2130  
Yellowknife, Northwest Territories  
X1A 2P6

Dear: Mr. Hagen:

**Re: Snap Lake Mine  
De Beers Canada Inc.  
Water License Amendment Application  
Water Licence #MV2011L2-0004**

De Beers Canada Inc. (De Beers) is pleased to submit the enclosed amendment application for Water License MV2011L2-0004, which expires on June 6, 2020. This application proposes to replace the Effluent Quality Criteria (EQC) for chloride, nitrate and fluoride as well as the whole-lake average Water Quality Objective for Total Dissolved Solids (TDS) - as specified in Part F 9 (a) and Part F 13 of the Water License, respectively - with site-specific EQC. The development of these criteria was a mandatory component of the TDS Response Plan (Part F16) and Nitrogen Response Plan (Part F17) required by the Water License.

It is noted that the EQC specified in Part F9 for nitrate, chloride, and fluoride become effective on January 1, 2015 and replace interim criteria established while the work De Beers had initiated on the development of site-specific criteria was completed. These criteria are based on generic water quality guidelines, and were established as precautionary measures in lieu of other evidence before the Board during the Water License Renewal proceedings in 2011. The work to develop site-specific criteria is complete and forms part of the enclosed application.

To ensure that the application proceeds in a timely manner, De Beers requests the Mackenzie Valley Land and Water Board (MVLWB) exempt this application from the preliminary screening provisions of the *Mackenzie Valley Resource Management Act* (MVRMA). De Beers maintains - as noted in the Legal Review and reiterated in the response letter from November 25, 2013 - that the appropriate regulatory process to consider an amendment to the TDS criteria is the MVLWB Water Licence amendment process. De Beers also maintains that a technically-focused regulatory process led by the MVLWB would provide an appropriate and efficient forum to present the issues, concerns and work plan for considering the amendment. De Beers looks forward to meaningful engagement with all regulators, during such a process.

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Should you have any questions, comments or require further clarification, please do not hesitate to contact me at (867) 766-7308 or e-mail me at the following address: [Alexandra.Hood@debeerscanada.com](mailto:Alexandra.Hood@debeerscanada.com).

Sincerely,

**DE BEERS CANADA INC.**



Alexandra Hood  
**Permitting and Environmental Superintendent**  
Snap Lake Mine

Attachments

Copied to:

M. Casas, J. Potten, L. Cymbalisty, R. Chouinard  
P. Kramers, P. Green, R. Walbourne  
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DKFN  
DBCI