



Giant Mine Remediation Project
PO Box 1500
Yellowknife, NT X1A 2R3

May 24, 2018

GIANT MINE REMEDIATION PROJECT – DISTRIBUTION LIST

Re: NOTIFICATION OF REQUEST FOR AMENDMENT TO THE TYPE B WATER LICENCE MV2012L8-0010 FOR REMOVAL OF MINEWATER VOLUME LIMIT

Please accept this letter as notification that Indigenous and Northern Affairs Canada (INAC) Giant Mine Remediation Project (GMRP) intends to submit an amendment application to the Mackenzie Valley Land and Water Board (MVLWB or Board) for the existing Type B Water Licence MV2012L8-0010. There is no change being proposed to the scope of the existing water licence. Specifically, INAC is requesting removal of Part C, Condition 3 which reads:

"The quantity of treated minewater used for all purposes shall not exceed 300 cubic metres per day."

The volume indicated in Part C, Condition 3 is also listed on the cover page of the Water Licence.

In 2014, through correspondence between INAC staff and MVLWB staff, it was identified that volumes of water exceeding the 300 m³/day limit defined in the water licence were required to complete paste backfill activities. This resulted in use of untreated minewater from the Tailing Containment Areas (i.e., North Pond or Northwest Pond) to supplement the treated minewater in the Polishing Pond. The Tailings Containment Areas are artificial reservoirs with no flow and limiting water use from such areas is excluded under the Waters Act.

The GMRP estimates daily volumes of approximately 500 m³/day will be required to complete the backfilling activities associated with C5-09. This estimate is based on volumes required for the four stopes that were previously backfilled. INAC is requesting removal of Part C, Condition 3 because the GMRP believes it erroneously limits the amount of water taken from an artificial internal reservoir, based on the following rationale:

- There is no natural inflow or outflow from the Polishing Pond as all water movement is a result of the water management on site (i.e., pumped through pipes). The Polishing Pond is a purpose-built structure that is part of the effluent treatment system. Water is pumped from the underground to surface into the Northwest Pond. During the discharge season (typically July to September), water is pumped from the Northwest Pond to the Effluent Treatment Plant (ETP) and then into the Settling Pond where the bulk of the flocculation occurs. Water moves into the Polishing Pond through the splitter dyke (this divides the Settling and Polishing ponds) where it is held until it is either (1) pumped through the discharge pipe into Baker Pond, (2) drawn down

for use in the paste backfill, which deposits it back underground in a closed circuit, or (3) when treated water is required for dust suppression on roads on site.

- The use of water in the Polishing Pond (or any of the tailings containment areas) is excluded from the definition of water “use” based on the clarification included in the footnote of Water Regulations Annex G (Miscellaneous Undertakings) which states the defined water use limits in Columns II, III and IV “does not include water taken from an artificial reservoir with no natural inflow”. As a result, use of Polishing Pond water for development of paste backfill, as long as it remains within the internal water management system at site, is in accordance with the Waters Act, without limits needing being placed on its use.
- Use of Polishing Pond water, instead of untreated minewater from the Tailings Containment Areas, reduces health and safety risks to workers.

Removal of this condition will assist the GMRP with completion of approved backfill activities as described in the Site Stabilization Plan and supporting documentation and approved through issuance of MV2012L8-0010, while remaining in compliance with Water Licence conditions and reducing additional risks to worker health and safety. Volume of all minewater used for backfilling activities will continue to be recorded and reported on a monthly and semi-annual basis.

INAC is anticipating submission of the amendment application in early June 2018. Once the amendment application has been deemed complete by the MVLWB, all parties will have the opportunity to submit formal comments through the MVLWB’s Public Review Process.

Should you have comments, questions, or would like more information prior to submission of the amendment application, please contact the undersigned by telephone at (867) 669-2838 or by email at Natalie.Plato@canada.ca, no later than June 7, 2018.

Sincerely,



Natalie Plato
Deputy Director
Indigenous and Northern Affairs Canada
Giant Mine Remediation Project