



Alternatives North

August 28, 2013

Willard Hagen
Chairperson
Mackenzie Valley Land and Water Board
Box 2130, 7th Floor, 4922- 48th Street
Yellowknife NT
X1A 2P6

Dear Mr. Hagen

Re: MV2102L8-0010 Submittal Package--Underground Stabilization

Thank you for the opportunity to review the underground stabilization submittal package submitted by Aboriginal Affairs and Northern Development Canada (AANDC) on August 7, 2013.

Alternatives North acknowledges the meeting held by AANDC on August 23 to discuss the underground stabilization work. It was helpful to hear about similar work undertaken near Canmore, Alberta and to be able to ask questions directly of the consultants and contractors. However, a number of issues and our concerns remain unresolved. Many of our concerns revolve around the following:

- Cross-referencing with other documents that explain the overall risk assessment and setting of priorities for the underground workings to justify the selection of the limited work to be undertaken in the submittal package and the order of priority of the work;
- Design criteria and assumptions for the work (e.g. ability to withstand earthquakes up to XX magnitude, designed to last XXX years);
- How trade-offs will be made amongst various design criteria and assumptions versus costs; and
- Performance criteria and measure of success (e.g. each void to be filled to a minimum of XX%, sampling of each batch of paste mix for QA/QC).

We are unsure about how any commitments made at the meeting will be recorded and/or transmitted to your Board. Unfortunately, it was unclear if AANDC intends to provide additional information or to correct some aspects of the submittal package, as noted in our detailed comments. In some cases we raise the same issues in our detailed comments to ensure that our understanding of commitments made by AANDC, are indeed what has been agreed to.

We would find it much more helpful for future meetings, if AANDC would clearly commit to provide additional information, correct its submissions and generally take a “can do” approach. Even more importantly, AANDC should hold such meetings before it makes regulatory submissions and use the Working Group it has established, in a proactive manner, to help serve the purpose for which it was established.

We strongly urge AANDC to review the results of the paste field tests and an updated Work Plan for the underground stabilization with the Working Group before it submits this material to your Board.

Finally, in an effort to expedite the underground stabilization work, we submit our comments well before the regulatory deadline and look forward to timely and full responses from AANDC.

Sincerely,

A handwritten signature in black ink that reads "Kevin O'Reilly". The signature is written in a cursive, slightly slanted style.

Kevin O'Reilly
Alternatives North

cc. Chiefs, Yellowknives Dene First Nation
Adrian Paradis, A/Manager, Giant Mine Team, AANDC
Ray Case, Environment and Natural Resource, GNWT
Mark Heyck, Mayor, City of Yellowknife
Bob Bromley, MLA Weledeh
Vern Christensen, Mackenzie Valley Environmental Impact Review Board