



Mackenzie Valley Land and Water Board
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Staff Report

Applicant: New Discovery Mines Ltd.	
Location: Mon Gold Mine – Discovery Lake, NT	Application: MV2013C0021 & MV2014L2-0002
Date Prepared: September 23, 2016	Meeting Date: October 5, 2016
Subject: Waste Management Plan, Version 7	

1. Purpose/Report Summary

The purpose of this Staff Report is to present to the Mackenzie Valley Land and Water Board (MVLWB or the Board) New Discovery Mine's (NDM) Waste Management Plan Version 7 (Plan V.7) for Board decision, as required under Part G, item 2 of Water Licence MV2014L2-0002 and condition 40 of Land Use Permit MV2013C0021.

2. Background

- July 3, 2014 – Permit MV2013C0021 and Licence MV2014L2-0002 were issued;
- October 21, 2015 – Permit MV2015C0015 and Licence MV2015L2-0004 were issued;
- August 12, 2016 – Waste Management Plan, Version 6 submitted to the Board;
- August 19, 2016 – Waste Management Plan, Version 6 distributed for review;
- September 8, 2016 – Reviewer comments due;
- September 15, 2016 – NDM responses due;
- September 17, 2016 – NDM responded to reviewer comments;
- September 20, 2016 – NDM submitted an updated Waste Management Plan, Version 7 to address reviewer comments;
- **October 5, 2016 – Waste Management, Version 7 presented to the Board for decision.**
- July 2, 2019 – Expiry of Permit MV2013C0021; and
- July 2, 2021 – Expiry of Licence MV2014L2-0002.

3. Discussion

On July 3, 2014, Permit MV2013C0021 and Licence MV2014L2-0002 were issued to NDM. The Board's issuance letter (attached) noted that the Waste Management Plan must be revised in accordance with the comments made during the review and resubmitted for Board approval, prior to the commencement of construction of the project. NDM submitted the Waste Management Plan, Version 6 on August 12, 2016, to fulfill this requirement (attached).

4. Comments

NDM also holds Land Use Permit MV2015C0015 and Water Licence MV2015L2-0004 for the Mon Gold Mine project, issued October 21, 2015 (attached). These two authorizations include milling facilities, a dry stack tailings facility, a landfarm, water use and deposit of waste, and other standard infrastructure including roads, an explosives storage area, accommodations, a sewage treatment plant, fuel storage, and use of equipment.

5. Review Comments

By September 8, 2016, comments and recommendations on the Waste Management Plan, Version 6 were received from the following reviewers:

- Government of the Northwest Territories (GNWT) – Department of Environmental and Natural Resources (ENR); and
- Board Staff.

NDM submitted their responses to reviewer comments on September 17, 2016, which was two days past the response deadline of September 15, 2016. Board staff uploaded NDM's responses to the Online Review System (ORS) on September 19, 2016. On September 20, 2016, NDM submitted an updated Waste Management Plan, Version 7 (Plan V.7), to address comments received by reviewers during the review.

The reviewer comment table (attached) presents the concerns identified through the review of the Waste Management Plan, Version 6 (Plan V.6).

During the review, GNWT-ENR raised a series of concerns with the Plan V.6, some of which were not addressed in the updated Plan V.7. Table 1 below outlines the changes and updates requested by reviewers that were not addressed in the updated Plan V.7:

Table 1: List of Commitments for approval - changes and updates requested by reviewers that were not addressed in the updated Plan V.7

Reviewer Comment Number	Required Update
GNWT-ENR 3	The Waste Management Plan should be updated to include reference to GNWT Inspectors as appropriate, and the reference to AANDC inspectors shall be removed.
GNWT-ENR 7	The two bullets under the Wood Waste section outlining wood waste management shall be updated to clearly identify which bullet represents un-treated wood waste management activities, and which represents treated wood waste management activities.
GNWT-ENR 9	The information on page 12 regarding mine waste water discharge shall be updated to reference the correct Water Licence conditions. It currently states Part A, item 9, and this should be corrected to Part G, items 9, 10 and 11.
MVLWB 2	As described in the July 3, 2014 issuance letter, the location for the storage of ammonium nitrate shall be added to the map within the Waste Management Plan.

GNWT-ENR expressed concern that some of the activities referenced in the Waste Management Plan were not reflective of the scope of the Permit MV2013C0021 and Licence MV2014L2-0002 (specifically milling (GNWT-ENR 11) and landfarming (GNWT-ENR 4 and 5), and requested that references to these activities be removed from the Plan. However, NDM is authorized to conduct milling and landfarming, albeit under Permit MV2015C0015 and Licence MV2015L2-0004. During the review for Permit MV2015C0015 and Licence MV2015L2-0004 (Board staff report attached), the GNWT commented about the administration of the Mon Gold Mine project (GNWT-Lands ID4):

It is ENR's understanding that the scope of Water Licence MV2015L2-0004 is limited to milling activities, the sewage treatment plant, the dry-stack tailings facilities and some ancillary activities whereas the current licence held by the proponent, MV2014L2-0002, includes re-opening and securing of declines, advance mineral exploration, storage of waste rock and ore, etc. Of note, ENR highlights that similar activities exist within both licences such as water withdrawal from Discovery Lake and fuel storage.

There is a potential that there may be some confusion in the future during the administration and enforcement of the two licences. For example, do separate withdrawal limits exist for both Water Licences and if there is an overage which Water Licence will be in non-compliance? Similarly, if there is a fuel spill associated with the fuel storage, which Water Licence will it be reported under? This could create some inconsistencies in reporting, administration and securities management/release of these two Water Licences. The same is true if we need to draw on security for something at the site. Which security

would we need to draw upon for items that are covered under one or both licences. It would seem that two separate Water Licences are not required and that the original could be amended to include the new activities. Alternatively, the two Water Licences could be amalgamated after issuance to provide clarity and consistency moving forward. Note ENR is not aware of any other development project in the NWT at which mining and milling are regulated under different Water Licences.

ENR recommends that Water Licences MV2014L2-0002 and MV2015L2-0004 be amalgamated after issuance to remove unnecessary confusion related to the administration of these files.

In response, NDM noted that it would be simpler to operate using a single Water Licence and Land Use Permit.

The Board's response to this comment noted that:

Some of the proposed activities overlap the same space, as well as some management plans, as the existing Permit/Licence. Should the Proponent seek a new Permit and Licence for the amalgamation of their existing authorizations, the Board will process the request at that time, and will ensure that the scope covers all activities proposed under the application.

Board staff are of the opinion that a similar response is warranted to address the GNWT's current comment regarding the inclusion of milling and landfarming activities into a single Waste Management Plan for all four authorizations granted to NDM for the Mon Gold Mine project.

6. Security

For reclamation security for this project, NDM is required to post \$164,038.00 for Water Licence MV2014L2-0002 and \$88,110.00 for Land Use Permit MV2013C0021, prior to commencement of construction. The Board has not yet received receipts indicating this has been posted.

7. Conclusion

New Discovery Mine Ltd. has not addressed all of the reviewer concerns for the Plan V.6 with the submission of the updated Plan V.7. An additional submission should be required.

8. Recommendation

- 1) Approve the Waste Management Plan, Version 7, as submitted on September 20, 2016, as an interim plan, and require the submission of an updated plan containing the items outlined in Table 1 above. Board staff could then provide written confirmation of the contents of the revised Plan to NDM prior to the commencement of construction.

OR

- 2) Not approve the Waste Management Plan, Version 7, as submitted on September 20, 2016, and require the submission of an updated plan containing the items outlined in Table 1 above.

9. Attachments

- [July 3, 2014 Issuance Letter – MV2013C0021 & MV2014L2-0002;](#)
- [October 21, 2015 Issuance Letter - MV2015C0015 & MV2015L2-0004;](#)
- [October 21, 2015 Staff Report, including Reviewer comment summary table - MV2015C0015 & MV2015L2-0004;](#)
- [Waste Management, Version 6;](#)
- [Waste Management Plan, Version 7;](#)
- Reviewer Comment Summary Table;
- Draft Reasons for Decision; and
- Draft Decision Letter.

Respectfully submitted,



Kierney Leach
Regulatory Officer

Review Comment Table

Board:	MVLWB
Review Item:	New Discovery Mines - Waste Management Plan
File(s):	MV2013C0021 MV2014L2-0002
Proponent:	New Discovery Mines
Document(s):	Issuance Letter with LUP and WL (1MB) Waste Management Plan (1MB)
Item For Review Distributed On:	Aug 19 at 17:13 Distribution List
Reviewer Comments Due By:	Sep 8, 2016
Proponent Responses Due By:	Sep 15, 2016
Item Description:	<p>On August 12, 2016 New Discovery Mines (NDM) submitted a Waste Management Plan (WMP) for review and Board approval. On July 3, 2014, the Board issued a letter to NDM outlining that the Waste Management Plan to satisfy condition 40 of permit MV2013C0021, shall be re-submitted for review and Board approval, prior to the commencement of construction for this project in accordance with the comments made during the review and outlined in the letter. This issuance letter, which is followed by land use permit MV2013C0021 and water licence MV2014L2-0002, is attached below.</p> <p>Reviewers are invited to submit questions, comments, and recommendations on this submission using the Online Review System (ORS) by Thursday September 8, 2016 at 1700h (5pm MST) on the Waste Management Plan.</p> <p>All documents that have been uploaded to this review are also available on our public registry.</p> <p>If you have any questions or comments regarding this Plan or using the Online Review System, please contact Kierney Leach at 867-766-7470 or kleach@mvlwb.com.</p>
General Reviewer Information:	<p>In addition to the email distribution list, the following organizations received review materials by fax:</p> <p>Fort Resolution Métis Council - Trudy King (867)394-3322 Hay River Metis Council - Trevor Beck, President (867)874-4472 NWT Metis Nation - Tim Heron, NWTMN IMA Coordinator (867)872-3586</p>
Contact Information:	Jen Potten 867-766-7468 Kierney Leach 867-766-7470

Comment Summary

GNWT - ENR: Central Email GNWT				
ID	Topic	Reviewer Comment/Recommendation	Proponent Response	Board Response
13	General File	Comment (doc) ENR Letter with Comments and Recommendations Recommendation		
1	Topic 1: New Discovery Mines "Waste Management Plan"	Comment New Discovery Mines Ltd. (NDML) is not registered in the Northwest Territories as a generator of hazardous waste. The Guideline for the Management of Hazardous Waste in the NWT[i] defines hazardous waste and outlines the roles and responsibilities of generators, carriers, and receivers of hazardous waste in the NWT. ENR, Environment Division (ED) registers generators, carriers, receivers, and tracks the disposal of hazardous waste generated in the NWT to registered receiving facilities on hazardous waste movement documents (manifest). Recommendation 1) It is recommended that NDML register as a generator of hazardous waste according to the Guideline for the Management of Hazardous Waste in the NWT.	Sep 19: NDML is operating in a phase format, and will register as a Hazardous Waste Producer when it is appropriate.	Acceptable response.
2	None	Comment None Recommendation 2) New Discovery Mines Ltd. reference the Guideline for the Management of Hazardous Waste in the NWT and outline in the Waste Management Plan (WMP) that they will confirm the ultimate disposal of hazardous waste on hazardous waste movement documents (6 part manifest).	Sep 19: Confirmed	Noted.

3	Topic 2: Post-Devolution Updates	<p>Comment Several sections (e.g. Waste Types - Camp, Incineration Guidelines) reference obtaining approval from the AANDC Inspector. GNWT now has responsibilities for land and water post-devolution, and it is the GNWT Inspector that should be referenced.</p> <p>Recommendation 1) ENR recommends the WMP reference GNWT Inspectors as appropriate.</p>	<p>Sep 19: Confirmed</p>	<p>This information was not updated in the Waste Management Plan, Version 7, submitted after the review on September 20, 2016.</p> <p>The Waste Management Plan should be updated to include reference to GNWT Inspectors as appropriate, and the reference to AANDC inspectors shall be removed.</p>
4	Topic 3: Landfarm	<p>Comment The Waste Handling section on Page 17 notes that a potential management option for contaminated soils or snow is treatment in a landfarm. Limited information is provided in the WMP describing siting, design or operation of a landfarm. Section 3.4.1 of the MVLWB Guidelines for Developing a Waste Management Plan provide additional guidance on the information that will be required in the event that a landfarm is constructed to treat contaminated soils or snow on site. This information must be provided if a landfarm is being proposed. The WMP should not be approved without the required landfarm information, or the section should be revised to only reference other methods for management of contaminated soil or snow.</p> <p>Recommendation 1) ENR recommends that the required information be</p>	<p>Sep 19: WMP will be amended to expand on Land Farming</p>	<p>The Board notes that some of the activities identified in the Waste Management Plan overlap between all of NDM's existing authorizations for this project. In the review for Land Use Permit MV2015C0015 and Water Licence MV2015L2-0004 GNWT-Lands identified the potential for confusion surrounding the administration and enforcement of all the authorizations for the project. GNWT-Lands recommended that the Licences be amalgamated.</p>

		<p>submitted to the Board for review and approval in the event that a landfarm to treat contaminated soil and snow is constructed on the site. The WMP should not be approved until detailed information on a proposed landfarm is provided to reviewers.</p>		<p>Should the Proponent seek a new Permit and Licence for the amalgamation of their existing authorizations, the Board will process the request at that time, and will ensure that the scope covers all activities proposed under the application.</p> <p>As per the October 21, 2015 issuance letter for Land Use Permit MV2015C0015 and Water Licence MV2015L2-0004 NDM is required to resubmit the Waste Management Plan, for approval by the Board. As these authorizations include landfarming, these comments may be addressed in subsequent updates to the Waste Management Plan submitted for those authorizations.</p>
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5	None	<p>Comment None</p> <p>Recommendation 2) Alternatively, ENR recommends that the proponent has the option to revise the WMP to remove all references to a landfarm currently in the Plan.</p>	<p>Sep 19: WMP will be amended to expand on Land Farming</p>	<p>See above response to GNWT-ENR 4.</p>
6	Topic 4: Sewage Treatment	<p>Comment Greywater and sewage is reportedly treated in a bioreactor before discharge. Limited information is provided on the design, operation and performance of the bioreactor. Section 3.4.6 of the MVLWB Guidelines for Developing a Waste Management Plan provide guidance on the information that should be provided in regards to an on-site sewage treatment facility.</p> <p>Recommendation 1) ENR recommends that NDML provide the additional information on the sewage treatment facility as described in Section 3.4.6 of the MVLWB Guidelines for Developing a Waste Management Plan prior to the WMP being approved.</p>	<p>Sep 19: WMP will be ammended expanding on operations of sewage treatment facility</p>	<p>Acceptable response.</p>
7	Topic 5: Wood Waste	<p>Comment This section considers two types of wood waste - un-treated and treated, and includes two bullets describing waste management activities. It appears that the first bullet applies to un-treated wood waste and the second to treated wood waste, but this distinction is not explicitly clear.</p> <p>Recommendation 1) ENR recommends this section be updated to clearly identify the specific treatment practices that are intended to apply to the two types of wood waste.</p>	<p>Sep 19: WMP will be ammended to clearly distinguish be treated and untreated wood.</p>	<p>These two bullets describing wood waste management were not updated to clarify which bullet is in regards to un-treated wood waste management vs. treated wood waste management in the Waste Management Plan, Version 7, submitted after the review on</p>

				September 20, 2016.
8	Topic 6: Document Forms - Page 18	Comment This section consists of a heading "Document Forms" followed by a series of bullets. It is not clear what the information contained in the bullets refers to. Recommendation 1) ENR recommends that this paragraph be reviewed and revised as appropriate.	Sep 19: Corrected	This section was removed in the updated Waste Management Plan, Version 7, submitted after the review on September 20, 2016.
9	Topic 7: Mine Water Disposal	Comment A paragraph on Page 12 identifies that mine water will be skimmed of visible oils prior to discharging to a low area >100 m from any stream when the mill is not operating. This is not the only requirement for mine water discharge. Any discharge of mine water must fully align with information provided on Page 17, and with Part G, Sections 9, 10 and 11 of Water Licence MV2014L2-0002 that includes a description of other parameters that also need to be monitored. Further to this, an Inspector's authorization is required prior to any discharge from the project. Recommendation 1) ENR recommends that the information on Page 12 be updated to align with the requirements of the Water Licence.	Sep 19: Corrected	This was not properly corrected in the updated Waste Management Plan, Version 7, submitted after the review on September 20, 2016. This should be corrected, as described in GNWT-ENR's comment, to refer to Part G, items 9, 10 and 11, not Part A, item 9, as this does not exist.
10	Topic 8: Sumps and Management of Drilling Wastes	Comment The July 3, 2014 issuance letter includes a table describing the information that is to be included in the revised plans associated with the Land Use Permit and the Water Licence. The table explicitly identifies that information on the management of drill cuttings, as well as details	Sep 19: Confirmed	Noted.

		<p>regarding the installation and operation of sumps is to be included in the WMP. Information on the management of drill cuttings, including those which may have the potential to result in ARD/ML, is also included as a requirement for the Geochemical Characterization and Management Plan. The information regarding disposal of drill cuttings provided in the WMP should be reviewed and revised to ensure it aligns with the findings of the Geochemical Characterization and Management Plan, when this plan is submitted to the Board.</p> <p>Recommendation 1) ENR recommends that the current information relating to disposal of drill cuttings be reviewed and updated, as required, based upon the results of the Geochemical Characterization and Management Plan.</p>		
11	Topic 9: Mill Waste	<p>Comment The WMP contains overview information regarding the intent to dry stack tailings. ENR does not consider the provided information sufficient to guide actual operation of such a facility and notes that Section 3.4.4 of the MVLWB Guidelines for Developing a Waste Management Plan identify that proponents should expect to complete a Tailings Management Plan as a separate report from the WMP-to describe how waste is managed by the tailings containment area. As such, the approval of tailings handling and storage options should not occur under a the WMP. ENR requests that</p>		Refer to above response to GNWT-ENR 4.

		<p>additional information on tailings and drystacking should first be provided in a Tailings Management Plan for approval before it is include in the actual WMP.</p> <p>Recommendation 1) ENR recommends that a stand-alone Tailings Management Plan be required and approved by the Board prior to any generation and disposal of drystack tailings in an approved facility.</p>		
12	Topic 10: Mine Rock	<p>Comment The WMP includes an overview description regarding how mine rock (waste and non-waste) will be handled. ENR notes that Part G, 3 of MV2014L2-0002 also requires that a separate Waste Rock Management Plan be submitted to the Board for approval, and describes the requirements of such a plan. The information provided in the current WMP does not meet the requirements for a Waste Rock Management Plan outlined in Part G, Item 3 of the Water Licence, and ENR expects that a more fully developed Waste Rock Management Plan will be provided to the Board prior to approval as per the requirements of the Water Licence.</p> <p>Recommendation 1) ENR notes that a Waste Rock Management Plan as described in Water Licence MV2014L2-0002 still needs to be developed, submitted and approved for this project.</p>	<p>Sep 19: A Waste Rock Management Plan is being developed and will be submitted</p>	Acceptable response.

ID	Topic	Reviewer Comment/Recommendation	Proponent Response	Board Response
1	Design for Secondary Containment.	<p>Comment The July 3, 2014 issuance letter includes a table describing the information that is to be included in the revised plans associated with the Land Use Permit and the Water Licence. In this table, a 'Design for Secondary Containment' is required for inclusion in the revised WMP, however this requirement is not present in the recently submitted Waste Management Plan revision.</p> <p>Recommendation Board staff recommend the addition of a Design for Secondary Containment to the Waste Management Plan.</p>	Sep 19: Additional design work will be submitted.	Acceptable response. This was added to the updated Waste Management Plan, Version 7, submitted September 20, 2016.
2	The location for the storage of ammonium nitrate on the map included with the WMP.	<p>Comment The July 3, 2014 issuance letter includes a table describing the information that is to be included in the revised plans associated with the Land Use Permit and the Water Licence. In this table, the location for the storage of ammonium nitrate on the Plan's map is required for inclusion in the revised WMP, however this requirement is not present in the recently submitted Waste Management Plan revision.</p> <p>Recommendation Board staff recommend the location for the storage of ammonium nitrate be added to the map within the Waste Management Plan.</p>	Sep 19: Map revised	This was <i>not</i> added to the updated Waste Management Plan, Version 7, submitted September 20, 2016. A revised map should be submitted.



September 8, 2016

Kierney Leach
Regulatory Officer
Mackenzie Valley Land and Water Board
7th Floor – 4910 50th Avenue
P.O. Box 2130
Yellowknife, NT
X1A 2P6

Dear Ms. Leach,

**Re: New Discovery Mines
Land Use Permit – MV2013C0021
Waste Management Plan
Request for Comments**

The Department of Environment and Natural Resources (ENR), Government of the Northwest Territories (GNWT) has reviewed the plan at reference based on its mandated responsibilities under the *Environmental Protection Act*, the *Forest Management Act*, the *Forest Protection Act*, the *Species at Risk (NWT) Act*, the *Waters Act* and the *Wildlife Act* and provides the following comments and recommendations for the consideration of the Board.

Topic 1: New Discovery Mines – Waste Management Plan

Comment(s)

New Discovery Mines Ltd. (NDML) is not registered in the Northwest Territories as a generator of hazardous waste.

The [Guideline for the Management of Hazardous Waste in the NWT^{\[1\]}](#) defines hazardous waste and outlines the roles and responsibilities of generators, carriers, and receivers of hazardous waste in the NWT.

ENR, Environment Division (ED) registers generators, carriers, receivers, and tracks the disposal of hazardous waste generated in the NWT to registered receiving facilities on hazardous waste movement documents (manifest).

Recommendation(s)

- 1) It is recommended that NDML register as a generator of hazardous waste according to the [Guideline for the Management of Hazardous Waste in the NWT](#).
- 2) New Discovery Mines Ltd. reference the [Guideline for the Management of Hazardous Waste in the NWT](#) and outline in the Waste Management Plan (WMP) that they will confirm the ultimate disposal of hazardous waste on hazardous waste movement documents (6 part manifest).

Topic 2: Post-Devolution Updates

Comment(s):

Several sections (e.g. Waste Types – Camp, Incineration Guidelines) reference obtaining approval from the AANDC Inspector. GNWT now has responsibilities for land and water post-devolution, and it is the GNWT Inspector that should be referenced.

Recommendation(s):

- 1) ENR recommends the WMP reference GNWT Inspectors as appropriate.

Topic 3: Landfarm

Comment(s):

The Waste Handling section on Page 17 notes that a potential management option for contaminated soils or snow is treatment in a landfarm. Limited information is provided in the WMP describing siting, design or operation of a landfarm. Section 3.4.1 of the MVLWB Guidelines for Developing a Waste Management Plan provide additional guidance on the information that will be required in the event that a landfarm is constructed to treat contaminated soils or snow on site.

This information must be provided if a landfarm is being proposed. The WMP should not be approved without the required landfarm information, or the section should be revised to only reference other methods for management of contaminated soil or snow.

Recommendation(s):

- 1) ENR recommends that the required information be submitted to the Board for review and approval in the event that a landfarm to treat contaminated soil and snow is constructed on the site. The WMP should not be approved until detailed information on a proposed landfarm is provided to reviewers.
- 2) Alternatively, ENR recommends that the proponent has the option to revise the WMP to remove all references to a landfarm currently in the Plan.

Topic 4: Sewage Treatment**Comment(s):**

Greywater and sewage is reportedly treated in a bioreactor before discharge. Limited information is provided on the design, operation and performance of the bioreactor. Section 3.4.6 of the *MVLWB Guidelines for Developing a Waste Management Plan* provide guidance on the information that should be provided in regards to an on-site sewage treatment facility.

Recommendation(s):

- 1) ENR recommends that NDML provide the additional information on the sewage treatment facility as described in Section 3.4.6 of the *MVLWB Guidelines for Developing a Waste Management Plan* prior to the WMP being approved.

Topic 5: Wood Waste**Comment(s):**

This section considers two types of wood waste – un-treated and treated, and includes two bullets describing waste management activities. It appears that the first bullet applies to un-treated wood waste and the second to treated wood waste, but this distinction is not explicitly clear.

Recommendation(s):

- 1) ENR recommends this section be updated to clearly identify the specific treatment practices that are intended to apply to the two types of wood waste.

Topic 6: Document Forms - Page 18

Comment(s):

This section consists of a heading “Document Forms” followed by a series of bullets. It is not clear what the information contained in the bullets refers to.

Recommendation(s):

- 1) ENR recommends that this paragraph be reviewed and revised as appropriate.

Topic 7: Mine Water Disposal

Comment(s):

A paragraph on Page 12 identifies that mine water will be skimmed of visible oils prior to discharging to a low area >100 m from any stream when the mill is not operating. This is not the only requirement for mine water discharge. Any discharge of mine water must fully align with information provided on Page 17, and with Part G, Sections 9, 10 and 11 of Water Licence MV2014L2-0002 that includes a description of other parameters that also need to be monitored. Further to this, an Inspector’s authorization is required prior to any discharge from the project.

Recommendation(s):

- 1) ENR recommends that the information on Page 12 be updated to align with the requirements of the Water Licence.

Topic 8: Sumps and Management of Drilling Wastes

Comment(s):

The July 3, 2014 issuance letter includes a table describing the information that is to be included in the revised plans associated with the Land Use Permit and the Water Licence. The table explicitly identifies that information on the management of drill cuttings, as well as details regarding the installation and operation of sumps is to be included in the WMP.

Information on the management of drill cuttings, including those which may have the potential to result in ARD/ML, is also included as a requirement for the Geochemical Characterization and Management Plan. The information regarding disposal of drill cuttings provided in the WMP should be reviewed and revised to ensure it aligns with the findings of the Geochemical Characterization and Management Plan, when this plan is submitted to the Board.

Recommendation(s):

- 1) ENR recommends that the current information relating to disposal of drill cuttings be reviewed and updated, as required, based upon the results of the Geochemical Characterization and Management Plan.

Topic 9: Mill Waste**Comment(s):**

The WMP contains overview information regarding the intent to dry stack tailings. ENR does not consider the provided information sufficient to guide actual operation of such a facility and notes that Section 3.4.4 of the *MVLWB Guidelines for Developing a Waste Management Plan* identify that proponents should expect to complete a Tailings Management Plan as a separate report from the WMP—to describe how waste is managed by the tailings containment area.

As such, the approval of tailings handling and storage options should not occur under a the WMP. ENR requests that additional information on tailings and drystacking should first be provided in a Tailings Management Plan for approval before it is include in the actual WMP.

Recommendation(s):

- 1) ENR recommends that a stand-alone Tailings Management Plan be required and approved by the Board prior to any generation and disposal of drystack tailings in an approved facility.

Topic 10: Mine Rock**Comment(s):**

The WMP includes an overview description regarding how mine rock (waste and non-waste) will be handled. ENR notes that Part G, 3 of MV2014L2-0002 also requires that a separate Waste Rock Management Plan be submitted to the Board for approval, and describes the requirements of such a plan.

The information provided in the current WMP does not meet the requirements for a Waste Rock Management Plan outlined in Part G, Item 3 of the Water Licence, and ENR expects that a more fully developed Waste Rock Management Plan will be provided to the Board prior to approval as per the requirements of the Water Licence.

Recommendation(s):

- 1) ENR notes that a Waste Rock Management Plan as described in Water Licence MV2014L2-0002 still needs to be developed, submitted and approved for this project.

Comments and recommendations were provided by ENR technical experts in the Water Resources Division, the Environment Division and the North Slave Region and were coordinated and collated by the Environmental Impact Assessment Section, Conservation, Assessment and Monitoring Division (CAM).

Should you have any questions or concerns, please do not hesitate to contact Patrick Clancy, Environmental Regulatory Analyst at (867) 767-9233 Ext: 53096 or email patrick.clancy@gov.nt.ca.

Sincerely,



Patrick Clancy
Environmental Regulatory Analyst
Environmental Impact Assessment Section
Conservation, Assessment and Monitoring Division
Department of Environment and Natural Resources
Government of the Northwest Territories

^[1] Government of the Northwest Territories, 1998. Guideline for the General Management of Hazardous Waste in the NWT. Available online at: http://www.enr.gov.nt.ca/_live/pages/wpPages/Waste_Management_Program_publications.aspx