



PO BOX 1500
YELLOWKNIFE, NT X1A 2R3

October 25, 2017

GIANT MINE REMEDIATION PROJECT DISTRIBUTION LIST

RE: NOTIFICATION OF REQUEST FOR AMENDMENTS TO THE TYPE B WATER LICENCE MV2012L8-0010 AND LAND USE PERMIT MV2016S0016 FOR PUMP INSTALLATION IN AKAITCHO HEADFRAME AREA

Please accept this letter as notification that Indigenous and Northern Affairs Canada (INAC) Giant Mine Remediation Project (GMRP) intends to submit amendment applications to the Mackenzie Valley Land and Water Board (MVLWB or Board) for the existing Type B Water Licence MV2012L8-0010 and corresponding Type A Land Use Permit MV2016S0016. There is no change being proposed to the scope of the existing water licence and land use permit. Two amendments are being requested:

- installation of submersible pumps in the Akaitcho headframe area; and
- extension of the Water Licence term to ensure appropriate time for testing.

Amendment to Approved Pumps

Maintenance and upgrades to existing infrastructure, including the replacement of the existing pumps at the water treatment plant, was included in the scope of the original Site Stabilization Plan (INAC 2011), which was approved by the Board on March 28, 2013. Maintaining the current underground minewater level is required for site stability and to prevent flooding of the existing underground arsenic trioxide stores. In order to maintain underground water levels, minewater is pumped to surface for storage in the Northwest Pond Tailings Containment Area prior to treatment. The existing pumps are near the end of their lifespan and must be replaced.

INAC proposes a change in the type of pump used for water management. INAC would like to use submersible pumps, which are mounted above the mine pool and located underground, as an alternative to the existing style of pump. Submersible pumps are placed directly in the water, and unlike the existing pumps, can be lifted up to the surface for maintenance and repair. This will eliminate the current need for underground access and, therefore, will reduce potential health and safety risk to workers. The submersible pumps will continue to support site water management during remediation activities until the new water treatment plant is installed and on line.

Submersible pumps were not screened in the preliminary screening of the original licence and permit applications; therefore, amendments to the existing Water Licence MV2012L8-0010 and Land Use Permit MV2016S0016 are required.



The installation of two submersible pumps will require the following activities:

- Installing a floating pad for the drill rig – Vegetation will be cleared and some soils will be removed to level the area. A liner will then be placed on the ground and clean aggregate will be placed on top to create the pad. Any contaminated organic material and soil will be removed from the area and disposed of in the existing Northwest Pond Tailings Containment Area (i.e., disposal is consistent with existing water licence and land use permit requirements and the approved Waste Management Plan).
- Drilling two holes for pump installation - Two boreholes will be drilled and then widened to a final diameter of 12-inches. The pumps will then be installed by lowering into the boreholes to the required operational level and activated.

The existing pumps will be turned off, but left in place until remediation is completed in accordance with the Giant Mine Closure and Reclamation Plan, once approved. The final workplan outlining the specific details associated with this work will be provided with the formal amendment application to the MVLWB.

Licence Term Amendment

Pump installation is planned for early 2018, pending regulatory approvals and award of the project to a contractor through the Government of Canada Procurement Process. It is anticipated the pumps will be tested during spring freshet 2018 to ensure the new pumps are able to handle maximum pumping capacity.

Water Licence MV2012L8-0010 expires January 31, 2019. Should delays in procurement or construction result in delayed installation of the pumps, testing of the pumps during maximum flow conditions will not be possible until freshet 2019, which is after expiry of the Water Licence. As a precaution, INAC is requesting a 1.5 year extension to the Water Licence MV2012L8-0010 term, to July 31, 2020. This extended timeline ensures there is time for pump installation and proper testing, as well as any additional work on the pumps that may be necessary (including any additional testing during freshet) prior to Licence expiry.

INAC is anticipating submission of the amendment application package for pump installation in the Akaitcho headframe area in November 2017. Once the 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.



If you have comments, questions, or would like more information prior to submission of the application package, please do not hesitate to contact the undersigned by phone at (867) 669-2838 or by email at Natalie.Plato@canada.ca, no later than November 3, 2017.

Sincerely,

A handwritten signature in blue ink that reads "Natalie Plato". The signature is fluid and cursive, with the first name being more prominent than the last.

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