October 20\textsuperscript{th}, 2017.

Ms. Michelle Peters,  
Superintendent, Environment,  
Suite 300, 5120-49\textsuperscript{th} Street,  
Yellowknife, NT. X1A 1P8

Ms. Peters,  

\textbf{Re: Care and maintenance during the 2017-2018 winter season.}

Discussions with De Beers staff for several months has indicated an intention to enter some sort of zero-occupancy version of Extended Care and Maintenance sometime in the fall of 2017. No official notice has been submitted to date, and no update to the existing (approved) Extended Care and Maintenance Plan (ECMP, v. 1.1) authorizing any proposed changes has been submitted to the MVLWB.

The Inspector has noted on several occasions that De Beers needs to submit an updated ECMP for approval & get approval for its proposed operational changes before it can implement those changes. This was communicated in a phone conversation of October 12\textsuperscript{th}, 2017, during inspections of September 27\textsuperscript{th} & August 16\textsuperscript{th}, and at a meeting on August 10\textsuperscript{th}, 2017. A review of the relevant compliance documents including the Extended Care and Maintenance Plan (v. 1.1) and the E.C.M.P approval letter from the MVLWB (June 22, 2016) (and other relevant documents) confirms that De Beers would need to submit an updated E.C.M. Plan for approval. It states:

1. The MBLWB reminds De Beers that any changes to the ECMP must be resubmitted to the Board for approval.
2. The Board reminds De Beers that alternate treatment methods, such as the proposed passive treatment...along with a shift towards remote-monitoring, would require an update to the ECMP and approval by the Board.
3. An updated ECMP shall be submitted to the Board for approval prior to a zero-employee site with remote monitoring systems.
To be clear, should De Beers wish to change from a camp with a continuous staff presence towards one where the minesite is vacant, it cannot do so without an approved (updated) ECM in place. Specific requirements of that updated ECM should be discussed with the MVLWB through the usual approval process.

In order to ensure the protection of the receiving environment, the inspector requires the following:

1. A detailed description of what De Beers proposes to change with regards to the currently approved E.C.M.P. This description must include specific details such as:
   - the locations, frequency, and nature of monitoring which will take place throughout the minesite (& identification of what monitoring will not occur during periods of zero vacancy);
   - the locations, frequency, and nature of ongoing maintenance which will take place throughout the minesite (& identification of what maintenance will not occur during periods of zero vacancy);

2. A detailed discussion of the actions De Beers will be taking to control ice and water build-up in the mines surface water collection facilities (i.e., all surface sumps and ditches as well as the water management pond). Basically, provide a detailed description of what actions will be taken to ensure that sufficient capacity exists to contain all water containment needs, including events of large volumes of water such as the spills which occurred in the winter of 2011/12.

The inspector urges De Beers to submit an updated ECMP as soon as possible detailing the above-noted information & any desired operational changes it seeks in the forthcoming winter. In the interim, until that approval process is completed & an updated ECMP approved, De Beers will be expected to continue to meet the terms and conditions of its existing E.C.M.P. (v. 1.1).

If you have any questions or concerns about these requirements, please do not hesitate to contact me at (867) 767-9187 ext. 24187 or tracy.covey@gov.nt.ca.

Sincerely,

Tracy Covey
Resource Management Officer III,
North Slave Region, GNWT (Lands)

cc. Marty Sanderson, Scott Stewart (GNWT-Lands)
    Kierney Leach (WLWB)