

Meghan Schnurr

From: Sinclair, Sean (DDMI) <Sean.Sinclair@riotinto.com>
Sent: November 12, 2020 2:10 PM
To: Meghan Schnurr; Boa-Antwi, Kofi (DDMI)
Cc: Cassandra DeFrancis; Anneli Jokela; Macdonald, Gord (DDMI)
Subject: RE: [External] RE: 2nd Extension Request_ICRP V4.1 Comment Response Deadline

Hi Meghan,

See responses below in **red**. Sorry for the delay I got mixed up with the holiday yesterday.

Thanks,

Sean Sinclair, B.Sc., M.Sc., P.Geo.
Principal Advisor, Closure Readiness

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From: Meghan Schnurr <mschnurr@wlwb.ca>
Sent: November 9, 2020 4:07 PM
To: Boa-Antwi, Kofi (DDMI) <Kofi.Boa-Antwi@riotinto.com>
Cc: Sinclair, Sean (DDMI) <Sean.Sinclair@riotinto.com>; Cassandra DeFrancis <kdefrancis@wlwb.ca>; Anneli Jokela <ajokela@wlwb.ca>
Subject: [External] RE: 2nd Extension Request_ICRP V4.1 Comment Response Deadline

Hi Kofi,

In review of DDMI's November 6, 2020 request, Board staff have a few follow-up questions. DDMI's letter states that the requested extension "is the most efficient path forward to resolve major outstanding issues raised during the ICRP review and ensure a Final Closure Reclamation Plan is submitted on schedule." The CRP Version 4.1 proposes many changes to the approved Version 3.1 and it is unclear how a delay in Board consideration of the CRP Version 4.1 may influence closure planning and/or progressive reclamation prior to submission of a final CRP. The CRP Version 4.1 includes both component-specific and integrates closure schedules, which identifies work to be completed in 2021. It is unclear the timelines by which DDMI requires certainty on scheduled closure activities for 2021.

Board staff are requesting clarity on how the requested extension may influence DDMI's closure planning and associated submissions. Board staff are requesting the following clarifications:

1. DDMI has indicated in interim CRP Version 4.1 that it plans to submit a determination on whether the PKC Facility will be closed as a wet or dry facility. Please clarify:
 - a. What the nature of this submission will be (e.g., update to the interim CRP); and. **A closure design with drawings (WL F4). This individual approval for the PKCF Closure Design is required by DDMI before starting progressive reclamation of the facility. DDMI expects to submit this in Q1 2021.**

- b. Does the requested deadline extension impact DDMI's plans for this submission? **No.**
2. The interim CRP Version 4.1 states fish habitat construction within the dyked areas is being reconsidered with DFO and Indigenous communities to confirm that this is the most appropriate offsetting plan. Please clarify:
 - a. How the results of this consideration would be submitted to the Board; and **A potential Addendum to Diavik's Fisheries Authorization will reflect the outcome of this indigenous engagement and the DFO review process & decision. The result of DFO's decision will be incorporated into the next FCRP.**
 - b. Does the requested deadline extension impact DDMI's plans for this submission? **No. DDMI is not anticipating that fish offsetting options/selection requires approval from the WLWB.**
3. Clarify any/all areas where DDMI requires a Board decision to move forward in 2021 for planned progressive reclamation activities (e.g., construction of fish habitat in open pits, decommissioning of underground); and **Aside from WRSA-NCRP, NIWTP acid and usual annual demolition, there is no progressive reclamation planned in 2021. Subject to a positive decision on the PKMW project, progressive reclamation of the PKC could begin in 2022. This would require a decision on the PKCF Closure Design by Q4 2021. Associated with the PKMW project will be decommissioning of the A418 UG following the protocols proposed in the ICRP and aligned with those completed at Ekati and Snap Lake Mines. DDMI will require approval of this prior to decommissioning planned for Q1 2022.**
4. Clarify any/all areas where DDMI requires a Board decision to move forward in 2021 for continued closure planning (e.g., wet-dry cover option selection). **PKC Closure Design and A418 decommissioning – both pending approval of the PKMW Project. It should be noted that the outcome of discussions on the mixing zone predictions have the potential to impact essentially all Diavik closure designs and closure execution schedules which is why we are trying to advance this ASAP.**

In order for Diavik's request to be considered at the next Board meeting, we ask that this information be provided by end-of-day Wednesday November 11th. If DDMI is unable to provide the above information in this timeframe, please indicate when it can be provided. Let us know if you have any questions.

Masi,

Meghan Schnurr

Technical Advisor

Wek'èezhì Land and Water Board

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From: Boa-Antwi, Kofi (DDMI) <Kofi.Boa-Antwi@riotinto.com>

Sent: November 6, 2020 10:16 PM

To: Cassandra DeFrancis <kdefrancis@wlwb.ca>

Cc: Anneli Jokela <ajokela@wlwb.ca>; Meghan Schnurr <mschnurr@wlwb.ca>; Bill Pain <bill_pain@gov.nt.ca>;

Macdonald, Gord (DDMI) <Gord.Macdonald@riotinto.com>; Sinclair, Sean (DDMI) <Sean.Sinclair@riotinto.com>

Subject: RE: 2nd Extension Request_ICRP V4.1 Comment Response Deadline

Hi Cassandra,

As discussed with Sean, please find attached our request for a second extension to the deadline for our response to review comments on ICRP Version 4.1.

Please do get in touch if you have any questions regarding this request.

Cheers,
Kofi

Kofi Boa-Antwi, M.Sc., R.P.Bio.
Superintendent, Environment

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