Hi Kassandra,

In consideration of your question below and our call on Friday, 16 March, I’d like to clarify DDMI’s understanding of this directive.

DDMI assumes that the purpose of submitting the Water Management Plan and relevant portions of the SNP is to advance site management procedures through a review and approval process with the Board. As operational experience is gained through monitoring and management over time, the WMP and SNP are updated to reflect any relevant changes, and they undergo a full review and approval process when updated. For example, identifying that Pond 7 also captures flow from the AN storage and road areas. Therefore, changes to the purpose and function of the Drainage Control and Collection System that have occurred over time, and may differ from the August 1999 Drainage Ditches and Collection Ponds document, have been reviewed and approved as part of this process.

Following on this understanding and in light of the Board’s 27 October 2017 decision regarding the definition of waste and WMP V14, DDMI included a more detailed description of the overall purpose of the Drainage Control and Collection System and we also updated the Collection Pond descriptions within the WMP V14.1 and the SNP to provide greater clarity on the possible sources of runoff and/or seepage water that is captured by the Ponds, as this is the main containment system for minimizing the volume of runoff/seepage water that would otherwise reach the receiving environment.

The purpose is outlined in Section 3.2.3, “The Drainage Control and Collection System consists of a network of ditches and ponds with the purpose to intercept and collect runoff and seepage waters from various areas of the site prior to entering the receiving environment. These areas include: Waste Rock Storage Area-North Country Rock Pile (WRSA-NCRP), PKC dam embankments, the Waste Rock Storage Area-South Country Rock Pile (WRSA-SCRP) and site roads/laydowns/camp/buildings/airport facilities (refer to site map in Appendix B)” and the Collection Pond descriptions are summarized in Table 3-1 of WMP V14.1 and throughout the Part E site descriptions in the SNP.

In summary, it is DDMI’s understanding that the Part F Item 17 design applies to the construction of the Drainage Control and Collection System. Operational changes or modifications to this system are captured in updates to the Water Management Plan and in the Annual Engineer’s reports. There is no direct reference to the August 1999 Drainage Ditches and Collection Ponds document in the Water License definitions or Part H Item 22 relating to changes in the operation, purpose, function or description of the Collection Ponds that would imply that DDMI was to specifically highlight these types of changes from this document over the years. DDMI continues to operate and maintain the Drainage Control and Collection System to the engineering standards identified in the license.

Please don’t hesitate to contact me if you have further questions.
Hi Sean

DDMI submitted the Water Management Plan Version 14.1 on March 6, 2018 in conjunction with a Surveillance Network Program (SNP) Update. Board staff conducted a conformity check of Version 14.1 against Board directives related to the Water Management Plan. Board staff have identified one potential non-conformity with the April 4, 2016 Board Decision on Version 14 of the Water Management Plan. Specifically, Requirement #2 from the April 4, 2016 Reasons for Decision (also referenced in the October 24, 2017 Board Decision as Requirement 1(c)) appears to be incomplete. This requirement was: “The Board requires DDMI to clarify the intent and usage of all collection ponds, as well as ensure consistency in supporting documentation when it submits its Surveillance Network Program (SNP) Amendment”.

- In the SNP Update submitted on March 6, 2018, DDMI states that “DDMI has also clarified information on the intent of the collection ponds, as well as the PKC interception and DPS wells within the Water Management Plan V14.1 and updated the corresponding SNP station descriptions to reflect these clarifications, as required”. However, the revisions in the attached SNP update appear to be related to changes to the in-flows to the ponds, but do not seem to clarify the contradictory information between the original intent of the ponds and the rationale stated in the SNP.
  - For instance, in the April 2016 Reasons for Decision on the Water Management Plan V14, the Board states that the rationale in the SNP of the Water Licence for Pond 7 has differences than the original intent as stated in
the Drainage Ditches and Collection Ponds document (August 1999). In the SNP update, new text was added to the rationale for Pond 7 in the SNP Update, but there are still discrepancies between the SNP and the original 1999 plan for Pond 7, with no clarification provided.

Could you indicate to Board staff, as soon as possible, specifically where DDMI has clarified the contradictory information as described above or confirm that this information is missing from the current submission?

Thanks

Kassandra DeFrancis, BEng., BSc., EIT
Regulatory Specialist
Wek’èezhii Land and Water Board
#1-4905 48th St. | Yellowknife, NT | X1A 3S3
ph 867.765.4581 | fax 867.765.4593
kdefrancis@wlwb.ca | www.wlwb.ca

All correspondence to the Board, including emails, letters, faxes and attachments are public documents and may be posted to the public registry.