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To: ["Emilie Bjornson"](#); [Angela Love](#)
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Subject: RE: NHX topics for Gahcho Kue Interim Closure Workshop
Date: September-30-16 12:37:22 PM
Attachments: [image005.png](#)

Hi Angela,

Below are some questions / comments for consideration at the ICRP workshop next week. These are submitted on behalf of the Deninu Kue First Nation,

First, I build upon comments that we made on an earlier version of the ICRP (September 24, 2014 workshop):

- We asked the question: Will caribou be able to walk to the top of the mine rock piles for refuge from insects? De Beers stated that this will be considered. In the current version of the ICRP it is stated that ramps will be constructed to facilitate the safe movement of caribou on mine rock piles. However, no cover material or revegetation efforts are planned for the mine rock piles so it remains unclear how the safe movement of caribou will occur.
- Can the long term objective be amended to include ecosystem function? De Beers stated it will consider post closure land use objectives with respect to ecosystem function, but this is not clear in the current version of the ICRP.

In the current ICRP, the overarching closure goal for the site is "To return the site and affected areas around the Mine to technically viable and, where practicable, self-sustaining ecosystems that are compatible with a healthy environment and with human activities."

- Despite this goal, De Beers admits uncertainties remain regarding the successful achievement of closure objectives, which is of concern given the short lifespan of the mine. The Reclamation Research Plans are supposed to address these uncertainties, but these are incomplete and not comprehensive.
 - Vegetation – what type of experimental trials will occur? Who will be involved in these? How is traditional knowledge going to be incorporated?
 - Improving habitat quality for caribou and other wildlife – there is essentially nothing presented in this section. Given the major concerns regarding caribou it is critical that this research be identified now.
- The research plans should identify indicators of ecosystem function and how these will be monitored to measure self-sustaining capabilities.

Best regards,

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Subject: FW: NHX topics for Gahcho Kue Interim Closure Workshop

Hi, here is what the Ni Hadi Xa
Rosy, DKFN

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Subject: RE: NHX topics for Gahcho Kue Interim Closure Workshop

Hi Angela, here are our topic suggestions for the upcoming workshop.

- 1) The Closure plan lacks a clear high level vision. The goals and principles echo the guidance documents, but provide insufficient context for the reader to broadly/generally understand what this land will look like in the future. These sections should be able to convey the big picture in plain language narrative statements.

As an example, it is not clear what type of ecosystem (Section 2.2) the project is attempting to restore. This is not defined nor described.

- 2) Wildlife Habitat – despite previous concerns, there is a single objective that directly relates to habitat – SW6 which provides for safe passage, with a lack of definition. There is a distinct lack of commitment to provide useful habitat. This is an issue that has been raised numerous times, with the company ‘noting’ the issue, but it has seemingly not altered the closure plan not provided meaningful responses to community concerns.

Caribou were a key line of inquiry during the EA, and we all know the situation isn't

getting any better. The company should be aware of the concerns as they have been raised many times...to continue to not provide clear goals or meaningful objectives that explain how this site will fit into the landscape is disconcerting.

Readers have only a vague idea what this site will look like after De Beers is done – the commitments remain vague and are linked to actions, not to results. The language used would allow anything from a gravel pad to a site that resembles what used to exist. At a minimum, precise language needs to be used to provide clarity. Again, as an example - the EA documents had quite a bit of vegetation and habitat mapping, with definitions as to the class. The company had committed to this similar approaches in 2014, but this remains absent from the ICRP, despite previous reviewer efforts seeking additional detail on what the site will look like and what habitats will be restored.

- 3) Changes and Updates – It's not particularly clear how the company has modified or responded to reviewers since the initial post-EA September workshop. There seems to have been relatively little effort to address matters raised.

As an example (there are other instances): in SW6, "Safe" is not defined, nor has there been an effort to do so. This has been previously identified and the issue remains.

There were a number of suggestions on how traditional knowledge users could aide the project's assessment of the closure. While this item has been acknowledged, there is no information as to what would constitute a 'qualified person' or how that would be established. Similarly, it's not clear if the criteria requires approval of 'aboriginal representatives' (again, undefined) or if they will attend to the site and, as in other instances, be afforded the opportunity for an open conversation, with the achievement of the criteria defined solely by the risk assessment.
- 4) This ICRP seems to be completed in isolation – without real learnings from other closure efforts. The EA noted that there needed to be an urgency to the completion of detailed closure plans, while the company promised that they would work with other mines to learn from those efforts. There is no evidence to this effect. Again, as an example, when considering site restoration – either natural recolonization or a more active approach, none of the lessons learned (appendix D) have been incorporated into the ICRP document.
- 5) The Reclamation Research plans remain incomplete – sometimes lacking clear goals/research purpose, commitments, key actions, and resources. As this work should be underway already, the lack of information with regards to some research is surprising.
- 6) Criteria – before the criteria can be fully understood, there needs to be clarity in terms of the language being used. As an example, the Objective SW6 notes that the area will be safe, as defined by a risk assessment. However, it's unclear what the company is willing to accept as safe – they likely have a much higher acceptance of risk to wildlife after closure than those who depend on the wildlife. Other definitions could benefit the legibility of the document as well, including one for how the project is using the word 'component'.

- 7) Linkages between Objectives, Criteria, Monitoring and Research Reclamation – these need to be more thoroughly considered as there are monitoring/inspection efforts that are unlinked to criteria, there are research efforts unlinked to criteria or objectives (in terms of what questions they are seeking to answer).
- 8) There is no objective to return Kennedy Lake to the regional system. There is only discussion on breaching internal dykes.
- 9) Closure of the Fine PK facility, including removal of the water pond, the cover/rock placement, and controlled runoff. Specifically, there are concerns with dewatering, ice lensing, porewater and settlement. We will also be seeking clarification on provisions for controlled runoff and discharge past Dyke L.

Regards



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Subject: ENR - Water Resources Division topics for Gahcho Kue Interim Closure and Maintenance Workshop

Hi Angela,

As discussed, our comments are still in draft form but I have identified some key areas below that we will wish to discuss at the workshop on October 7th. From Water Resources, Paul Green and I will be attending as well as Lara Fletcher from Brodie Consulting.

PAG Rock/Mine rock

We will have several lines of questioning related to PAG rock and will likely re-visit some of the recent PAG discussions that have occurred during recent reviews as there may be closure implications. Some of the specifics for discussion will include:

- Clarification from the Board on approved uses/storage areas of PAG rock
- Options for management
- Discussion on placement of PAG rock (e.g. final elevations, locations, cover construction, etc)
- Discussion on chemical stability as a closure objective
- Elevation of mine rock placement in 5034
- Potential for underground expansion and closure implications
- Contingencies

Fine PK

- Questions on capacity
- Contingencies

Coarse PK

- Research and monitoring results at Diavik and Ekati and implications for closure

Kennady Lake

Several lines of questioning on Kennady Lake including:

- Closure objectives for Kennady Lake – habitat to support aquatic ecosystem vs establishment of an aquatic ecosystem
- Monitoring requirements/duration for Kennady lake post-closure
- Adaptive management/reclamation research during operations to monitor water quality in Kennady Lake
- Work to be done regarding early restoration of Area 7
- Uncertainties related to Kennady Lake post-closure
- Timing of development of numerical closure criteria and water quality modeling for Kennady Lake
- Sediment quality in the pits

Water Management

- Factors related to decisions regarding transfer of water to Tuzo

- Contingencies regarding water quality predictions and impacts on closure
- Closure criteria related to stability of meromixis
- Potential for underground expansion and closure implications

Raised Lakes

- Assumptions regarding raised lakes and contingencies

Other

There will also be other items such as:

- Closure Principles
- Barren kimberlite (or LGO) management
- Overburden/lake sediment storage and management
- Use of overburden in reclamation
- Security comments

Feel free to give me a call if you have any questions or require any additional information.

Rick

PLEASE NOTE NEW PHONE NUMBER BELOW

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