

# DE BEERS GROUP

December 20, 2018

Chris Hotson  
Regulatory Manager  
Mackenzie Valley Land and Water Board  
4922 - 48th Street  
Yellowknife, NT. X1A 2P6

Dear Mr. Hotson:

**RE: Response to Information Request for Extending Gahcho Kue Interim Closure and Reclamation Plan Version 4.1 Submission (MV2005L2-0015)**

De Beers Canada Inc. (De Beers) appreciates Mackenzie Valley Land and Water Board (MVLWB)'s consideration of De Beers's request to extend the submission of the Gahcho Kue Interim Closure and Reclamation Plan (ICRP) Version 4.1. This letter is prepared in response to your information request, received on December 12, 2018.

As we indicated in the December 3 letter, we are struggling to understand how to address some of the Board's November 7, 2018 directives in such a way as to receive approval on this Interim Closure and Reclamation Plan. We would like to request time for further engagement with Board staff to understand the expectation of the review comments and directives and to agree with Board staff as to how to address those directives prior to the re-submission. We understand that this requirement for re-submission is part of a conformity check process, and not a new public review, therefore, the updated V.4.1 would not be subject to a public review period. If the updated ICRP V.4.1 conforms to Board direction already received, the ICRP would be recommended for approval by Board Staff. If this understanding is correct, then De Beers will re-submit the ICRP ahead of any future, yet undefined, mine plan changes. A subsequent submission of an ICRP would be made if mine plan changes were significant enough to warrant another update.

The current deadline specified in the November 7 ICRP Ver. 4 decision letter however will not allow sufficient time for either this additional engagement with the Board staff or for the preparation of an updated version of the ICRP. For this aspect of the extension request, De Beers would require an additional 60 days to undertake those discussions, and to prepare the updated ICRP. The extension request is therefore revised to March 29, 2019.

In regard to the implementation of the approved Reclamation Research Plan, De Beers' assumption was the plan had been approved. As a result, De Beers has initiated a number research tasks, including review of the revegetation practices at comparable mines and review of PK cover options and performance in the past year. The reclamation research results will be included in the 2018 Closure and Reclamation Progress

**De Beers Canada inc.**

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Report. However, the latest Board decision directed De Beers to revise and update the Reclamation Research Plan. The reclamation research programs requires long-term investments and consistent planning prior to the implementation. De Beers will cease all further implementation of the program until the ICRP, including the RRP, is fully and clearly approved.

Thank you again for your consideration of our request. Should you have any further questions or require further discussions, I can be reached at [sarah.mclean@debeersgroup.com](mailto:sarah.mclean@debeersgroup.com) or at (867) 688-9227.

Sincerely,

A handwritten signature in blue ink that reads "Sarah McLean". The signature is written in a cursive, flowing style.

Sarah McLean  
Environment and Permitting Manager  
De Beers Canada Inc.