

**From:** [Meaghan MacIntyre-Newell](#)  
**To:** [Read, Deborah](#)  
**Cc:** [Anneli Jokela](#)  
**Subject:** RE: ICRP Version 3.3 (Nighthawk)  
**Date:** July 28, 2020 9:09:00 AM

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Hi Deborah,

Thanks for following up. As outlined in the [Document Submission Standards](#), a Revision History Table is to be included in all submissions. A concordance table was included in V3.3 of the ICRP addressing all revisions resulting from Board direction. A concordance table is typically used to outline how a document meets the requirements of relevant legislation, guidelines, and licences or permits. In this case, it would be appropriate for the concordance table to be renamed a revision history table and a line item added to describe the changes made in Section 2.6.

If you could make those revisions and upload an unsecured version as soon as possible, it would be greatly appreciated.

Masi!

**Meaghan MacIntyre-Newell, MSc.**

Regulatory Specialist

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**From:** Read, Deborah <Deborah\_Read@golder.com>  
**Sent:** July 27, 2020 1:23 PM  
**To:** Meaghan MacIntyre-Newell <MMacIntyre-Newell@wlb.ca>  
**Cc:** McConaghie, Villa <Villa\_McConaghie@golder.com>  
**Subject:** ICRP Version 3.3 (Nighthawk)

**NOTE:** This email chain appears to contain email from outside Golder

Hi Meaghan

I just want to follow up with you with regards to the Damoti Lake ICRP v3.3 that was submitted on

July 3 and your email below.

The only changes made to the ICRP other than those requested in the Reasons for Decision were to Section 2.6 (Social [Human] Environment) where we updated some of the statistics with more recent data.

If you would like this include in the concordance table in Appendix D of the ICRP (or in some other format), please let me know. Otherwise we will be happy to upload an unsecured version of the ICRP v3.3.

Thanks  
Deb

**Deborah Read (Pahl) (Ph.D., CAPM)**

*Mine Closure Specialist*

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**From:** Meaghan MacIntyre-Newell <[MMacIntyre-Newell@wlb.ca](mailto:MMacIntyre-Newell@wlb.ca)>

**Sent:** July 24, 2020 2:51 PM

**To:** Panayi, Damian <[Damian\\_Panayi@golder.com](mailto:Damian_Panayi@golder.com)>

**Subject:** FW: ICRP Version 3.3

## EXTERNAL EMAIL

Masi!

**Meaghan MacIntyre-Newell, MSc.**

Regulatory Specialist

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**From:** Meaghan MacIntyre-Newell  
**Sent:** July 9, 2020 11:57 AM  
**To:** Michael J Byron <[mbyron@nighthawkgold.com](mailto:mbyron@nighthawkgold.com)>  
**Cc:** Panayi, Damian <[Damian\\_Panayi@golder.com](mailto:Damian_Panayi@golder.com)>; Anneli Jokela <[ajokela@wlwb.ca](mailto:ajokela@wlwb.ca)>  
**Subject:** ICRP Version 3.3

Hello Michael,

Board staff are in the process of conducting a conformity check of the ICRP Version 3.3. Nighthawk has provided a Concordance Table in Appendix D addressing the changes made in ICRP Version 3.3 in response to Board direction from the June 28, 2019 Reasons for Decision. Nighthawk has not, however, included a Revision History Table summarizing any revisions made to the ICRP that were not in response to Board direction and that would require consideration by the Board. Can Nighthawk provide a Revision History Table identifying any material changes not linked/resulting from WLWB direction? Alternatively, could Nighthawk respond by confirming that no other changes beyond those made to address Board direction and identified in the Concordance Table have been included?

Additionally, the document titled 'Interim Closure and Reclamation Plan V3\_3\_FINAL 03July2020.pdf' was uploaded as a secure document. According to the [Document Submission Standards](#), documents should be uploaded as unsecured documents. Can Nighthawk please re-upload an unsecured copy of the document?

Masi!

**Meaghan MacIntyre-Newell, MSc.**

Regulatory Specialist

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**From:** [Meaghan MacIntyre-Newell](#)  
**To:** [Michael J Byron](#)  
**Cc:** [Anneli Jokela](#); [Meghan Schnurr](#); [Panayi, Damian](#)  
**Subject:** ICRP Version 3.3 Conformity Check  
**Date:** August 6, 2020 8:45:00 AM

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Hello Michael,

Board staff have completed a conformity check on Version 3.3 of the interim Closure and Reclamation Plan (CRP). We have identified two areas that require further clarification below.

- Mixing Zones:** Board staff noted in the [June 25, 2019 Reasons for Decision](#) the Board decided (Decision #10) that Nighthawk is to propose “where closure criteria for Lardass Lake must be met, and provide a rationale.” The Board noted that “in order to propose a mixing zone, the company would need to demonstrate that the decision criteria for allocating regulated mixing zones are met, as described in Section 3 of the [MVLWB/GNWT Guidelines for Effluent Mixing Zones](#), and provide the information outlined in Section 6 of the Guidelines.” In Version 3.3 of the interim CRP, Nighthawk has proposed a mixing zone for Lardass Lake. It is unclear where the supporting information, required by Section 3 and Section 6 of the MVLWB/GNWT Guidelines for Effluent Mixing Zones, is located within Version 3.3 of the interim CRP. Can Nighthawk identify where the information requirements to support a mixing zone are met within Version 3.3 of the interim CRP?
- Security:** Board staff understand that as per the June 25, 2019 Reasons for Decision, Nighthawk is to submit an updated security estimate following approval of the interim CRP and it appears that no changes to security are proposed in Version 3.3 of the interim CRP. However, there appears to be a discrepancy between the values referenced in section 1.6 and section 10.0 and the security required by Nighthawk’s authorizations ([W2018X0006](#), [W2018C0007](#) (Conditions 57 and 58), [W2018L2-0003](#) (Schedule 2, Condition1), and [W2018L2-0002](#) (Schedule 2, Condition 1)). Can Nighthawk clarify the total financial security held for the Damoti property and the authorizations under which they are held?

Please review the areas identified above and indicate to Board staff, as soon as possible, where these items can be found or confirm that they are missing from the current submission. Please let us know how and when Nighthawk would be able to respond to any missing items identified, so we can decide how and when to proceed with the public review. Board staff would also like to remind Nighthawk that any changes made to the interim CRP Version 3.3 should be documented in the Revision History Table.

Masi!

**Meaghan MacIntyre-Newell, M.Sc.**

Regulatory Specialist

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