

AIR, WASTE, AND ABANDONMENT & RECLAMATION STATEMENT

De Beers is committed to an air quality monitoring program that confirms the predictions of the Environmental Assessment. De Beers' air quality monitoring program will consist of both emissions tracking and ambient air monitoring. Fuel use, emissions and other environmental performance parameters will be tracked and reported through the environmental management system. In response to concerns raised by interveners, De Beers existing ambient air monitoring will be enhanced by adding PM₁₀ and PM_{2.5} monitoring. The final design of the air quality monitoring program will be developed with input from regulators, regional stakeholders and other mine operators.

De Beers would also like to take this opportunity to provide some clarification regarding Closure and Reclamation that may address points raised by the Government of the Northwest Territories during their opening remarks.

Current plans for the landfill and landfarm includes operating each within the North Pile. The purpose of this is to reduce the size of the project footprint at any one time. The landfill and landfarm will initially be placed in the eastern section of the North Pile. Once the eastern section of the North Pile nears completion, the landfill will be capped and closed. The landfarm will be tested and decommissioned; any soils still exceeding GNWT guidelines will be transferred to the second landfarm, or taken off-site for disposal or treatment. The landfill and landfarm will then be re-established in the area of the west cell, with the landfill being located in the former quarry, and managed through to closure.

Landfarms are a proven technology for remediating hydrocarbon-contaminated soils in the North. Research supports the effectiveness of landfarming in cold climates. Landfarming has also been used successfully by government departments and private industry within the Northwest Territories. Based on these demonstrated successes, De Beers has selected landfarming as the best method for treating contaminated soils on site. However, we also recognize that comprehensive management and monitoring plans are key to effective landfarming. To this end, De Beers is committed to monitoring the landfarm to ensure effective performance, and would consider alternatives to landfarming, should management techniques prove to be ineffective in treating the soils. In their *Guidelines for Construction, Operation and Decommissioning of Land Treatment Facilities*, the Government of the Yukon states that "...petroleum hydrocarbon contaminated soils can be effectively and efficiently remediated through the use of landfarming techniques."

The Preliminary Closure and Reclamation Plan was developed by De Beers in February 2003 to support the establishment of reclamation bonding requirements. In response to intervener concerns, this document was submitted in advance of the Public Hearings. The plan was developed as a live document to which changes will be made during the regulatory and operations phases, based on intervener input, operating experience and research results. The Revegetation and Surface Materials Handling Plan appended to this document states that De Beers will establish a reclamation monitoring program to assess

the suitability and success of various reclamation activities. In addition, De Beers also submitted a Technical Memorandum outlining project milestones, including De Beers approach to the development of monitoring and management programs and proposed windows for intervener involvement. De Beers recognizes the importance of long-term monitoring for reclamation, revegetation and restoration of wildlife habitat.