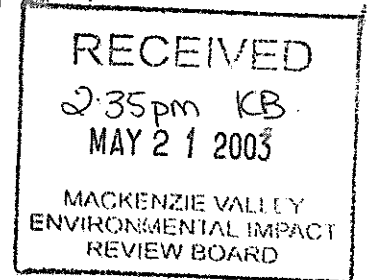




Northwest Territories Resources, Wildlife and Economic Development

May 21, 2003



Vern Christensen  
Executive Director  
Mackenzie Valley Environmental Impact Review Board  
Box 938, 200 Scotia Centre  
5102-50th Avenue  
Yellowknife, NT. X1A 2N7

VIA FACSIMILE

Dear Mr. Christensen

**ADDITIONAL SUBMISSIONS AND FINDINGS PRESENTED AT THE DE BEERS SNAP LAKE PUBLIC HEARING APRIL 28 – May 2, 2003.**

**STATEMENT: ON AIR, WASTE AND ABANDONMENT AND RECLAMATION**

The Government of the Northwest Territories (GNWT) has reviewed the De Beers Snap Lake Public Hearings documentation and has the following additional submissions and findings that it would like to submit to the Mackenzie Valley Environmental Impact Review Board.

An unscheduled submission by De Beers on Day Two of the public hearing presented information and commitments on the prepared presentation made by GNWT in the opening day's statement. This surprise addition to the Public Hearings agenda resulted in the Chairman establishing guidelines and timelines for submitting new technical information for all parties. The corrective action proposed should ensure future timely submissions by De Beers and other intervening parties at the Hearing.

The GNWT is pleased that De Beers has committed to an air quality monitoring program that includes tracking of emissions and ambient air monitoring. While the GNWT is satisfied with the air quality assessment conducted by De Beers in the EA, the dispersion modelling is a theoretical assessment based on estimates (albeit conservative) of potential emissions. Therefore, ongoing tracking of emissions, their sources and geographic locations is essential to confirm that emission estimates and spatial information used in the EA dispersion modelling remains representative and the model predictions remain valid. Emissions should



be tracked through an annual emissions inventory of all emission sources and emission parameters. Ambient air quality monitoring will provide data to support the modelling predictions, ensure continued compliance with NWT Ambient Air Quality Standards, track trends in ambient contaminant concentrations and assist with assessment of cumulative effects. The GNWT looks forward to working with De Beers in the development of their air quality monitoring program.

The waste management issues of landfills and landfarms as proposed by De Beers, based on two dedicated quarries sites one in the eastern section and one in the western section of the North pile for the life of the mine, is acceptable to GNWT. The previous concept of mobile, temporary landfills and landfarms is not an option we are prepared to support for this project. GNWT requests additional clarification on the location, size, planned engineered waste cover caps and waste management plans be forwarded to all regulatory agencies prior to any approvals.

As stated in earlier correspondence, De Beers proposed Environmental Management Systems to maximize recycling technologies onsite and offsite and to minimize disposal of inert solids to the landfills. The details of these programs, including volumes and progressive mitigation initiatives, should be submitted by De Beers prior to the implementation of any waste management deployment strategies.

The De Beers statement and comparison of landfarm successes for remediating hydrocarbon contaminated soils in the North is not supported by evidence or performance records of sites being remediated in the Arctic to NWT guidelines. The GNWT would be pleased to review landfarm operations that De Beers consider successful and proven in climatic conditions similar to Snap Lake. The reference by De Beers to guidelines from the Government of the Yukon stating, "...petroleum hydrocarbon contaminated soils can be effectively and efficiently remediated through the use of landfarming techniques.", is specific to the Yukon and its application in the NWT north of the tree line is questionable.

We are encouraged by De Beers commitment to ensure that comprehensive management and monitoring plans would be implemented as keys to an effective landfarming management plan at the Snap Lake mine site.

The Preliminary Closure and Reclamation Plan as submitted by De Beers in February 2003, as supporting evidence for the Public Hearing, has not been received by RWED. Comments relating this document can be incorporated into the Environment Agreement when the project goes to the Licensing phase.

Should you have any comments or concerns regarding the above, please contact myself at 873-7315.

Sincerely,

A handwritten signature in black ink that reads "Gavin More". The signature is written in a cursive, flowing style.

Gavin More  
Environmental Assessment Analyst  
Policy, Legislation Communication  
RWED, GNWT.

C. Doris Eggers  
Director, Policy Legislation & Communications, RWED

Emery Paquin  
Director, Environmental Protection, RWED