

I'd like to thank the Board for their patience during this hearing. I'd also like to thank the Board staff for all their hard work in making this hearing a reality.

Thank you to each of the intervening parties for the work they have put into this project, not just this week, but over the past several years. We acknowledge that collectively their input has helped us put before you a better project.

In summary, Miramar is requesting:

1. That the Board issue a Type A water licence for the Doris North Project, with a licence term of 8 years.

You have heard that from start to end of decommissioning, the Doris North Project extends over approximately 10 years. Thus, an 8 year licence provides us certainty against the construction operation and closure plans that are before you, but still provides all interested parties an opportunity to review our performance prior to the issuance of a second licence for final closure and post-closure monitoring.

2. Water Management Strategy and CCME -

In comparing the interveners' presentations against the written interventions, there appears to be recognition and agreement from the interveners that the discharge strategy proposed by MHBL is both reasonable and environmentally protective.

MHBL has worked diligently to develop and put in front of you as part of its application, what we believe is a very effective water management strategy to control the release of water from the Tailings Containment System. This includes a comprehensive model to simulate the proposed strategy. Under our strategy we have committed to meet two criteria:

- a. The Metal Mine Effluent Regulation discharge standards, including the required toxicity standard at the discharge point from Tail Lake. And,

- b. Meeting the Canadian Council of Ministers of the Environment (CCME) water quality guidelines for the protection of freshwater aquatic life in the receiving environment, specifically below the waterfall within Doris Creek.

We believe that this strategy is unique, precedent setting, and provides a high level of protection for water quality and all aquatic life downstream of the Doris North Project.

By in large, throughout this hearing process you have heard other parties agree that the strategy as presented will provide a high level of protection to water quality in the receiving environment.

However, in the Environment Canada submission, the Board has been asked to consider applying standards that are even more stringent than the CCME guidelines.

Miramar is very concerned that if conditions contained within the water licence require Miramar to use levels more stringent than the CCME guidelines in managing its water release, that this could limit the effective operation of our water discharge strategy as proposed. We are concerned that such a water license condition could subject us to unnecessary shutdowns and jeopardize the viability of the project.

You have heard from other parties that the CCME guidelines were established on the basis of ensuring full protection of aquatic life in the receiving environment.

Consequently, it is our opinion, that setting lower standards would not add further protection to the environment, but could jeopardize our ability to manage the water level in Tail Lake. Excessive water level change in Tail Lake could lead to shoreline erosion and extend the overall management period at closure.

3. Degree of Environmental Monitoring

In its application Miramar has proposed an environmental management and monitoring program that is very extensive,

meets all legislated requirements, and complies with the requirements contained in the NIRB Project Certificate.

Miramar strongly believes in responsible environmental stewardship and has thus committed to an extensive program of environmental monitoring. You have seen even during this hearing our willingness to reach a compromise on requested additional monitoring items, where these are reasonable and provide useful information.

However, Miramar is concerned with the extensive additional monitoring that has been recommended to you in the various interventions. Miramar would ask the Board to look at these requests and ask what is reasonable and truly necessary.

4. Reclamation Security Requirements

During this hearing you have heard a lot of exchange about how reclamation security should be posted for this project. In its application, Miramar presented the Board with a full Mine Closure and Reclamation Plan, including an estimate of reclamation cost that utilizes both the INAC Reclaim Model and the KIA proprietary reclamation costing model. Miramar has worked with the KIA to ensure that their standards of reclamation have been recognized and included. You have heard that there is general consensus that the overall reclamation liability for the Project is in the order of \$12 million. You have also heard a lot about how this security requirement could be split between water and land related activities. It is Miramar's belief that trying to split water from land liability is very difficult because land and water are interrelated. Miramar has acknowledged that it is our responsibility to post security against the full reclamation liability of this Project. However, you have also heard that there is no agreement on how the landowner and the federal government could jointly administer such security and consequently, Miramar is being asked to post security bonds that in aggregate exceed the acknowledged liability by about \$6 million. Miramar believes this is extremely unfair and would hope that the landowner and the federal government could reach some accommodation to bridge this impasse.

We thank the Board for this opportunity.