

23 July 2007

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VIA E-Mail

Indian and Northern Affairs Canada
Nunavut Regional Office
P.O. Box 100
Iqaluit, NU, X0A 0H0

Attention: Spencer Dewar

Dear Mr. Dewar,

Reference: INAC Review of Jericho Contingency Plan Update

We thank INAC for their review of the subject document. This letter is in response to INAC's letter of 9 July 2007.

Section 1.7.4, Regulation of Toxic Substances

INAC will be added to the list of interested parties in the next update of the Contingency Plan.

Table 3.2, External Emergency Contact Numbers

The changes will be made in the next update of the Contingency Plan

Table 4.1, Risk Analysis Worksheet

The purpose of the risk analysis worksheet is to provide insight into how risks of emergencies was assessed at the Jericho Diamond Mine. It is a qualitative generic assessment relying heavily on professional judgement. Actual emergencies are assessed by trained personnel who use their training and experience to assess actual emergency situations and make decisions based on:

1. minimizing risk of injury or death
2. minimizing impacts to the environment
3. minimizing damage or loss of property

Further, the risk analysis procedure is outlined in the Contingency Plan with further information available in the appendix containing the guide from which the risk analysis was derived (Appendix C). INAC is referred to this document for additional information. Adding the discussion requested will add nothing to the utility of the plan and just increase its bulk.

Table 12.1, Emergency Response Site Resource Inventory

Table 12.1 will be expanded in the next update of the Contingency Plan to include the location of radioactive source leak test kits. Monitoring and response to radioactive leaks is fully covered in Appendix D of the Contingency Plan, which INAC is referred to for further information.

Appendix B, Emergency Specific Procedures

- We cannot imagine an emergency arising from the use of Floor Dry, or automotive grease
- Please explain the basis for the reference to “soibitan monotailate”, “dyno gold”, “polycarboxylic acid amide” and “paraffin oil”.

Appendix F, MSDS

- Jet B is labeled JP4
- Only one type of Varsol solvent is used at the mine
- N7 and N23 emulsifiers are the same product
- Sodium thiocyanate is included in the MSDS list

As discussed in the Contingency Plan, both Jet A and Jet B are used at Jericho; INAC is referred specifically to Tables 6.1 and 17.1 and discussions attached thereto.

MSDS copies in the Contingency Plan serve no practical purpose. MSDS are kept in specially marked binders at stations throughout the mine site as required by WHMIS legislation. The plan could be materially reduced in bulk if the requirement to include MSDS were eliminated.

The Contingency Plan has much information that is of limited management use and is the result of a multitude of government reviews and requests throughout, and subsequent to, the approval and water licence processes. We would welcome the opportunity to reduce the document required by the water licence to something useful for real life emergency response.

Yours truly,



Bruce Ott
Director of Environment
Jericho Diamond Mine

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C. Ms. Phyllis Beaulieu, Nunavut Water Board