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Department of Environment

Ministère de l'Environnement

Oct 14, 2004

NWB File:

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Mrs. Phyllis Beaulieu
Manager of Licensing
Nunavut Water Board
P.O. Box 119
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via Email to:
licensing@nwb.nunavut.ca

Dear Mrs. Beaulieu:

Re: Waste Rock Management Plan, Benachee Resources

The Department of Environment (DOE), Government of Nunavut has reviewed the Waste Rock Management Plan for the Jericho Diamond Project and has the following comments and concerns.

It is noted in section 3.3.2 that seepage from the 'development waste pile' contained concentrations of copper and uranium in exceedance of CCME guidelines. It is also stated that rock likely to produce these elevated levels will be placed in a designated area at the centre of the dumps to promote freezing. DoE recognize that thermistors will be installed in both rock dumps to monitor freezing; however, DOE is concerned about the long-term impacts climate change may have on the encapsulation of this material and therefore the seepage emanating from it. A detailed assessment of the possible impact of climate change on these dumps needs to be a consideration of the Abandonment and Restoration Plan for the site.

Furthermore, the target end land use for the waste rock dumps will be wildlife habitat, an objective that DoE fully supports. However, except for the building of ramps on the slopes of the dumps to facilitate caribou passage, there appears to be no plans to cover the surface of the dumps. The choice of fine, non ARD/metal leaching, cover material seems crucial in establishing vegetation and achieving the end objective. DoE accept that more detail will be included in the final Closure and Reclamation plan for the site, but the sourcing and storage of such material is also a consideration for waste rock management and should be outlined.

We thank the NWB for giving us the opportunity to review the Waste Rock Management Plan. Please contact me if you have any further questions or comments.

Yours sincerely

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Original signed by

Mike Atkinson

Manager Land Use and Environmental Assessment

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