



**to:** Dave Stevenson, John Begeman  
**from:** Eric Denholm  
**cc:** Glenda Fratton  
**date:** April 26, 2007  
**re:** **Preliminary 2007 Environmental Workplan for Lupin and Ulu Sites**

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As requested, this is a preliminary 2007 workplan for environmental management of the Lupin and Ulu sites. This can be used for initial project planning but is really intended to be a vehicle for discussion, leading to finalization of a detailed *Environmental Management Plan for 2007*.

We understand that Dave visited the Lupin plant site on April 23 but could not access the Tailings Containment Area (TCA). Based on those observations of site conditions and communications with Mike Tansey regarding Kinross' winter inspections, we agree that it would be appropriate to conduct the initial ground inspection of the TCA in May when the Lupin camp has been opened.

Based on the work required to develop this preliminary workplan, we have not identified any areas of non-compliance regarding the recently assigned Lupin site. This will be further investigated as we develop a detailed management plan for 2007. The Ulu site has been under Wolfden's management for several years and we assume is in good standing as regards licence compliance.

There are three areas of work for the 2007 workplan (April 2007 to March 2008):

1. Care and Maintenance/Compliance (Lupin and Ulu);  
*This includes routine monthly and annual reports to the Nunavut Water Board (NWB), routine site inspections, updates to operating or monitoring plans, routine water samples, and other items related to maintaining compliance with the Water Licences or other environmental standards.*
2. Licence Renewal (Lupin and Ulu); and  
*This includes preparations of application documents, response to questions and participation in a Public Hearing (Hearing is likely to be in 2008); the renewal process might also incorporate approval of the Lupin Abandonment and Restoration (A&R) Plan and Security.*
3. Lupin A&R Plan and Security.  
*This includes completion and approval of the Lupin A&R Plan for the TCA and revised security estimate.*



The first recommended task for Care and Maintenance/Compliance area is of particular short-term importance regarding the Lupin site. We recommend that Wolfden prepare a letter to the NWB to acknowledge and respond to items raised in the NWB Letter of Assignment (dated April 13, 2007). There are three specific items in the Letter of Assignment that we suggest should be responded to right away: Spill Contingency Plan, A&R Plan and Security. The letter could also be used to: 1) outline Wolfden's 2007 management plans for both sites; and 2) to verify the Board's understanding of current compliance with the licences. Attachment I contains a brainstorming list of items that could be included in a letter to the NWB.

Table 1 (attached) provides the preliminary workplan as a series of tasks and costs, inclusive of the three areas of work listed above. The cost estimate includes the following assumptions:

- Monthly ice-free site visits for sampling and inspection (total of 6, May to Oct);
- Bi-Monthly site inspections during winter (total of 3, Nov-Mar);
- Monthly SNP reports and annual environmental report submitted to the NWB for each site;
- Monthly internal status reports to Wolfden;
- Attend two DIAND Inspections of each site;
- Conduct a professional engineering inspection of the Lupin TCA;
- Air charters to the sites from Yellowknife;
- The review of the Lupin A&R Plan is re-initiated and finalized;
- There is no release of water from the Lupin TCA or sewage pond in 2007;
- Both sites are linked for tasks to be performed according to a coordinated schedule; and
- Both licence renewals are initiated in summer 2007 (both expire in June 2008).

The preliminary budget estimate is \$539,224, pre-GST, inclusive of fees and disbursements.

In preparing this work plan and associated cost estimate, a preliminary assessment of the care and maintenance requirements for the Lupin and Ulu Water Licences was conducted. The notes of this assessment are provided as Attachment II.

I suggest that you review this preliminary workplan and then we have a teleconference call to discuss it further and how you would like us to prepare the detailed management plan. Alternately you can return comments or questions to me or Glenda and we will work them into a detailed plan for 2007.

EJD

**Table 1. Preliminary Workplan & Cost Estimate for 2007 Environmental Management of Lupin and Ulu Sites**

(Period from April 2007 to March 2008)

TASK	staff avg. hourly TIMING	Director		Senior		Technical		Clerical		TOTAL FEES	DISBURSEMENTS		TOTAL pre-GST
		\$200		\$165		\$125		\$75					
		Hours	Cost	Hours	Cost	Hours	Cost	Hours	Cost				
Lupin													
1 Detailed 2007 Env. Mgmt Plan	May	4.0	800	24.0	3,960	4.0	500	0.0	0	5,260	0	0	\$5,260
2 Letter to NWB	May	4.0	800	16.0	2,640	4.0	500	0.0	0	3,940	0	0	\$3,940
3 Update Spill Contingency Plan													
a) site inventory (June)	June	0.0	0	8.0	1,320	8.0	1,000	0.0	0	2,320	0	0	\$2,320
b) review and update plan	June/July	4.0	800	24.0	3,960	16.0	2,000	8.0	600	7,360	250	0	\$7,610
4 Monthly Ice-Free Inspections	May-Oct (6)	12.0	2,400	120.0	19,800	120.0	15,000	6.0	450	37,650	1,200	36,000	\$74,850
5 Monthly Sampling	May-Oct (6)	0.0	0	12.0	1,980	48.0	6,000	0.0	0	7,980	12,000	0	\$19,980
6 Bi-Monthly Winter Inspections	Nov-Apr (3)	6.0	1,200	36.0	5,940	36.0	4,500	0.0	0	11,640	0	18,000	\$29,640
7 Monthly SNP Reporting	Apr-Mar (12)	0.0	0	24.0	3,960	24.0	3,000	12.0	900	7,860	0	0	\$7,860
8 Geotechnical Inspection													
a) inspection/report	Jul/Aug	8.0	1,600	60.0	9,900	60.0	7,500	24.0	1,800	20,800	0	8,500	\$29,300
b) action plan	Jul/Aug	2.0	400	8.0	1,320	8.0	1,000	0.0	0	2,720	0	0	\$2,720
9 DIAND Inspections													
a) attend on site	(2)	0.0	0	24.0	3,960	8.0	1,000	0.0	0	4,960	0	12,000	\$16,960
b) response/action plan	(2)	4.0	800	16.0	2,640	16.0	2,000	0.0	0	5,440	0	0	\$5,440
10 Annual Env. Report	Mar	4.0	800	24.0	3,960	40.0	5,000	16.0	1,200	10,960	0	0	\$10,960
11 EEM and Miscellaneous Reporting													
a) Design 2008 field program	Jul/Aug	4.0	800	24.0	3,960	40.0	5,000	16.0	1,200	10,960	0	0	\$10,960
b) Env Canada approvals	fall/winter	4.0	800	16.0	2,640	24.0	3,000	16.0	1,200	7,640	0	0	\$7,640
c) Other Misc. Reporting	various	0.0	0	24.0	3,960	24.0	3,000	16.0	1,200	8,160	0	0	\$8,160
12 Renewal Process for 2007													
a) prepare application	Jul/Aug	8.0	1,600	40.0	6,600	24.0	3,000	16.0	1,200	12,400	0	0	\$12,400
b) response to questions	fall/winter	8.0	1,600	40.0	6,600	24.0	3,000	16.0	1,200	12,400	0	0	\$12,400
c) Public Hearing	2008	0.0	0	0.0	0	0.0	0	0.0	0	0	0	0	\$0
13 2008 Planning													
a) TCA discharge strategy	Oct	4.0	800	4.0	660	8.0	1,000	2.0	150	2,610	0	0	\$2,610
b) sewage pond discharge strategy	Oct	4.0	800	4.0	660	8.0	1,000	2.0	150	2,610	0	0	\$2,610
c) deploy lime on TCA Pond#2	2008	0.0	0	0.0	0	0.0	0	0.0	0	0	0	0	\$0
d) Detailed 2008 Env Mgmt Plan	March	4.0	800	24.0	3,960	4.0	500	0.0	0	5,260	0	0	\$5,260
14 A&R Plan Review		0.0	0	0.0	0	0.0	0	0.0	0	0	0	0	\$0
a) reactivation of process	Jun	8.0	1,600	32.0	5,280	32.0	4,000	8.0	600	11,480	1,500	0	\$12,980
b) Technical Meeting	Sep/Oct	8.0	1,600	40.0	6,600	40.0	5,000	16.0	1,200	14,400	10,000	6,000	\$30,400
c) Final Responses/Submission	Nov/Dec	8.0	1,600	40.0	6,600	40.0	5,000	16.0	1,200	14,400	10,000	0	\$24,400
15 Reclamation Cost Review													
a) initial cost development	Nov/Dec	8.0	1,600	40.0	6,600	16.0	2,000	4.0	300	10,500	0	0	\$10,500
b) technical review/questions	Feb/Mar	4.0	800	24.0	3,960	16.0	2,000	0.0	0	6,760	0	0	\$6,760
c) responses/final cost development	2008	0.0	0	0.0	0	0.0	0	0.0	0	0	0	0	\$0
Ulu		0.0	0	0.0	0	0.0	0	0.0	0	0	0	0	\$0
16 Detailed 2007 Env. Mgmt Plan	May	4.0	800	24.0	3,960	4.0	500	0.0	0	5,260	0	0	\$5,260
17 Monthly Ice-Free Inspections	May-Oct (6)	6.0	1,200	60.0	9,900	60.0	7,500	6.0	450	19,050	1,200	0	\$20,250
18 Monthly Sampling	May-Oct (6)	0.0	0	6.0	990	24.0	3,000	0.0	0	3,990	12,000	0	\$15,990
19 Bi-Monthly Winter Inspections	Nov-Apr (3)	3.0	600	16.0	2,640	16.0	2,000	0.0	0	5,240	0	0	\$5,240
20 Monthly SNP Reporting	Apr-Mar (12)	0.0	0	24.0	3,960	24.0	3,000	12.0	900	7,860	0	0	\$7,860
21 DIAND Inspections													
a) attend on site	(2)	0.0	0	24.0	3,960	8.0	1,000	0.0	0	4,960	0	0	\$4,960
b) response/action plan	(2)	4.0	800	16.0	2,640	16.0	2,000	0.0	0	5,440	0	0	\$5,440
22 Annual Env. Report	Mar	4.0	800	24.0	3,960	40.0	5,000	16.0	1,200	10,960	0	0	\$10,960
23 Other Miscellaneous Reporting	various	0.0	0	24.0	3,960	24.0	3,000	16.0	1,200	8,160	0	0	\$8,160
24 Renewal Process for 2007													
a) prepare application	Jul/Aug	8.0	1,600	24.0	3,960	16.0	2,000	16.0	1,200	8,760	0	0	\$8,760
b) response to questions	fall/winter	8.0	1,600	24.0	3,960	16.0	2,000	8.0	600	8,160	0	0	\$8,160
c) Public Hearing	2008	0.0	0	0.0	0	0.0	0	0.0	0	0	0	0	\$0
25 2008 Planning													
a) Detailed 2008 Env Mgmt Plan	March	4.0	800	24.0	3,960	4.0	500	0.0	0	5,260	0	0	\$5,260
Internal Monthly Status Report	(12)	12.0	2,400	24.0	3,960	36.0	4,500	12.0	900	11,760	0	0	\$11,760
Miscellaneous Mgmt and Comm		24.0	4,800	96.0	15,840	24.0	3,000	24.0	1,800	25,440	0	0	\$25,440
Total Estimated Fees and Disbursements		197.0	39,400	1,158.0	191,070	1,004.0	125,500	304.0	22,800	\$ 378,770	\$ 48,150	\$ 80,500	\$507,420

Charges \$31,804

**Total Estimated Budget, pre-GST \$539,224**

NOTES TO TABLE 1	
<b>Task 1:</b>	This is in addition to Task 2 of the budget proposed April 17, 2007.
<b>Task 3:</b>	Inventory conducted during May monthly site visit.
<b>Task 4:</b>	6 trips, two persons from Yellowknife; 1 to 1.5 days on site; air charters from Yellowknife.
<b>Task 5:</b>	Time is for sample and data management; costs are for field equipment and analyses.
<b>Task 8:</b>	The inspection could be done by a third-party geotechnical engineering firm.
	The action plan would be prepared by GLL/Wolfden and could lead to additional work.
<b>Task 9:</b>	Assume 2 DIAND inspections through ice-free season; air charters from Yellowknife.
<b>Task 11:</b>	This may include NPRI and other items.
<b>Task 12:</b>	A&R Plan and Security may be rolled into the renewal process but are budgeted separately.
	The Public Hearing might be assumed to be held in 2008.
<b>Task 13:</b>	Initial strategies for the TCA and sewage pond to be developed in October.
	If lime purchase is necessary, then arrangements for purchase and receipt on-site (winter road) will be made in Oct.
	Purchase of lime to be arranged/paid by Wolfden.
	Deployment of lime is assumed to be in April/May/2008 under the 2008 Mgmt Plan.
<b>Task 14:</b>	Reactivation of the process is a team meeting and a letter report to NWB with any outstanding updates or responses.
	One Technical Meeting is assumed required to finalize questions/responses - it might include the renewal process as well.
	All A&R Plan tasks include costs for consulting team (GLL, Nicholson, Holubec).
<b>Task 15:</b>	The initial cost development could occur while the A&R Plan is under review.
	Technical review and finalization is assumed after approval of the A&R Plan .
	Review and finalization of the cost might be rolled into the 2008 renewal process.
<b>Tasks 16-26:</b>	All Ulu site tasks are assumed to be "piggy-backed" onto Lupin tasks with shared flights and complementary scheduling.
	Costs for Ulu tasks are incremental to tasks performed for the Lupin site.
	We assume that there are no outstanding requirements for reports or plans for the Ulu site.
<b>General Disb:</b>	This includes all disbursements except travel and basic communications expenses (laboratory, subconsultants, reports, etc.)
<b>Travel:</b>	Air charters from Yellowknife to visit both sites is budgeted at \$6,000.
<b>Charges:</b>	Communications (5% of fees) plus administration (10% of disbursements).

## Attachment I – Items to consider for Letter to NWB

### Preliminary Compilation of Items for an Immediate Letter to NWB regarding the Lupin Site

- Request copies of all comments received re. the assignment of the Licence to Wolfden, as referenced in the Letter of Assignment.
- Wolfden's intent for 2007 (C&M or operations, 3<sup>rd</sup> party business?, airstrip/weather station?)
- Document the planned freshwater use (quantity and method) and confirm that the water use fee for 2007 will be paid on the licence anniversary date (July 1) as required; or simply include the water use fee with the letter
- Re-Confirm that the required reclamation security is resolved through DIAND Ottawa
- No discharge planned from TCA in 2007
- No discharge planned from sewage pond in 2007
- No weekly inspections of TCA planned or needed (variance of D.6.f) – monthly inspections planned through ice-free season instead (6 months, May-Oct); also bi-monthly winter inspections will be conducted (3 required, Nov/Dec, Jan/Feb, Mar/Apr)
- Annual professional engineering inspection of TCA is planned (D.6.g)
- Confirm that Wolfden will submit a revised Spill Contingency Plan but ask for extension from June 13 to July 13 in order to allow for Wolfden to base the plan on an on-the-ground survey of haz mats present on site and provide the best plan possible; this is not possible prior for a June 13 submission date; Wolfden needs the opportunity to occupy the site after snow melt, do a rigorous inventory and “make the plan their own”.
- Document that Wolfden wishes to “adopt” the Kinross A&R Plan that is currently under review and to re-initiate that review process; make it clear that Wolfden does not submit this or suggest it be reviewed as the Final A&R Plan per Part K Item 3 of the licence but as the update called for in the NWB's Letter of Assignment; this is in keeping with maintaining options for future operations at the site.
- Request clarification on the timing of the NWB's request for an update to security requirements – suggest that this be deferred until after approval of the A&R Plan.
- Document to the Board what analytical lab will be used or what criteria will be used for selection (i.e., CAEAL) per SNP A.2.

## Attachment II – Water Licence Preliminary Assessments

### Lupin Water Licence (NWB1LUP0008), Assessment of Required Care & Maintenance Activities for 2007

#### Water Licence Title Page

- Expiry date is June 30, 2008; a renewal should be initiated in summer 2007 as recommended by the NWB (see Licence Schedule III, Part 4).
- Possible issue to raise for amendment:
  - Be clear whether this is a renewal to keep terms and conditions that allow for operations (assumed preferred approach) or whether this is a renewal for care&mtce only
  - Strategize how the review and approval of the A&R Plan should coordinate with the licence renewal (concurrent approvals or push for a prior approval of the A&R Plan such that modified security could be part of the renewal proceeding?)
  - A.1.a, expand the scope of the project beyond mining of the Lupin ore body
  - A.2.d, is there an update to the legalities in this clause?
  - A.3."Backfill", expand the definition beyond structural support to include waste rock and contaminated soil?
  - A.3."TCA", expand (or clarify) the definition to include the drainage area and potential enlargement beyond the current dykes?
  - C.2, is the licence quantity of freshwater adequate for possible future uses?
  - D.2, is the July 15 discharge start date for TCA discharge appropriate or limiting to future operations?
  - D.3, is the 700,000 m<sup>3</sup>/day for TCA discharge appropriate or limiting to future operations?
  - D.5, are the EQC's appropriate or limiting to future operations?
  - D.6.f, clarify the requirement for weekly inspections is during operations and that during c&m periods inspections will be monthly during the ice-free season plus minimum every 90 days through winter plus freshet (May/June).
  - D.8 (first), are the EQC's appropriate or limiting to future operations?
  - G.1/2, the Tailings Management Study has been completed and can be removed from the Licence.
  - H.1/2, the Contingency Plan has been completed and can be removed from the Licence.
  - I.1, the A&R Plan has been submitted and can be removed from the licence.
  - I.3.a, remove or update the reference to the old Golder report based on the current A&R Plan.
  - SNP, review the requirements and propose revisions as needed.

#### Part A: Scope, Enforcement and Definitions

- No c&m actions required.

#### Part B: General Conditions

- B.1, Water Use Fee, must be pre-paid for the coming year on each anniversary date of the licence (July 1) (also see Schedule II, Part II).
- B.2, Security, maintain standing of security (through INAC Ottawa).
- Note also the requirement of the Letter of Assignment for an update to the security requirement (see below).

## Attachment II – Water Licence Preliminary Assessments

- B.5, Annual Report, Annual Report for 2006 was filed by Kinross, Annual Report for 2007 will be required by March 31, 2008.
- B.6, SNP, the SNP programs must be followed (see below).
- B.9, signs, ensure that signs are present at SNP monitoring sites.
- B.10, licence, ensure that the Water Licence is posted at the site.

### Part C: Conditions Applying to Water Use

- No c&m actions required.

### Part D: Conditions Applying to Waste Disposal

- D.4, TCA Discharge, notify inspector 5 days before discharge of water from TCA (not planned for 2007).
- D.6.a, TCA Operation, freeboard >1m or per the engineer/NWB.
- D.6.b/c, TCA Seepage, seepage is to be minimized and pumped back “immediately” to the TCA.
- D.6.d, TCA erosion, erosion is to be repaired “immediately”.
- D.6.f., TCA Weekly Inspections, weekly inspections required, suggest moving to monthly during ice-free season (6 months, May-Oct).
- D.6.g, TCA Annual Inspection, professional inspection required; engineers report and response plan to NWB within 60 days.
- D.7, Sewage, all sewage and greywater must discharge to the sewage pond.
- D.8 (second), Sewage Discharge, notify inspector 5 days before discharge of water from sewage pond (not planned for 2007).
- D.9/10, Mine Water, all mine water must discharge to the TCA or sewage pond (not planned for 2007) or an alternate plan can be submitted for NWB approval.

### Part E: Conditions Applying to Modifications

- No c&m actions required.

### Part F: Conditions Applying to Construction

- No c&m actions required.

### Part G: Conditions Applying to Studies

- G.3, TCA Management Report, an annual update is required as part of the Annual Env. Report.

### Part H: Conditions Applying to Contingency Planning

- H.3, Annual Update, the Contingency Plan is to be reviewed annually and updated for approval as required; this could be in conjunction with the Annual Env. Report (this is also re-iterated in the Letter of Assignment).
- H.4, Spill Reporting, spills or unauthorized discharge are to be reported to the soil reporting line and followed with an occurrence report.
- Note also the requirement of the Letter of Assignment for an update to the Contingency Plan (see below).

## Attachment II – Water Licence Preliminary Assessments

### Part I: Conditions Applying to Abandonment and Restoration

- K.1.k, Temporary Closure, the approved A&R Plan was to include measures for a temporary shut down (i.e., the current situation); these should have been implemented by Kinross but need to be understood and verified by Wolfden.
- Note also the requirement of the Letter of Assignment for an update to the A&R Plan (see below).
- K.2, Security Update, an annual assessment of the reclamation security is required, this could be in conjunction with the Annual Env. Report.
- Note also the requirement of the Letter of Assignment for an update to the security requirement (see below).
- K.3, Final A&R Plan, a Final A&R Plan is to be submitted 3 years prior to final closure of the mine (not planned for 2007).
- K.5, Annual Review, the A&R Plan is to be reviewed annually and updated for approval as required, this could be in conjunction with the Annual Env. Report.
- K.6, Notification, the NWB is to be notified at least 6 months prior to final closure (not planned for 2007).
- K.7, progressive reclamation is to be undertaken as feasible.

### Schedule I: Surveillance Network Program (SNP)

- A.2, Laboratory, the laboratory used should be approved by the NWB.
- A.6, Monthly Reports, a monthly SNP report is required for the NWB.
- B, Water Samples, 25-01 freshwater intake from Contwoyto Lake once per year.
- B, Water Samples, 25-02 TCA Discharge, required daily when discharging (not planned in 2007).
- B, Water Samples, 25-14 Sewage Pond Discharge, required monthly when discharging (not planned for 2007).
- B, Water Samples, 25-20/21/22/24/25, required weekly when discharging from TCA (not planned in 2007).

### Schedule II: Licencing Considerations

- I., 1/2, Renewal, application for renewal must be accompanied by a \$30 fee payment plus the water use fee for the first year of the requested term
- II, 6, Water Use Fee, payment is due in advance of each year on the anniversary date of the Water Licence (July 1).

### Schedule III: General Considerations for the Administration of Licences

- 3, Licencee should respond to and act on letters from the DIAND inspector.
- 4, Renewal Application, NWB recommends an application for renewal be filed one year before expiry (i.e., by July 1, 2007).
- 6, SNP Modifications, the NWB can modify the SNP without a Hearing based on written application and rationale.
- 9, Submissions, all reports, plans and studies are to be submitted in triplicate.

### Letter of Assignment

- Page 2, Spill Contingency Plan, must be reviewed and updated by 2 months from effective date (i.e., by June 13, 2007); we suggest requesting an extension from June 13 to July 13 in order to allow for Wolfden to base the plan on an on-the-ground survey of haz mats present on site and



## Attachment II – Water Licence Preliminary Assessments

provide the best plan possible; this is not possible prior for a June 13 submission date; Wolfden needs the opportunity to occupy the site after snow melt, do a rigorous inventory and “make the plan their own”.

- Page 2, A&R Plan, must be reviewed and updated by 2 months from effective date (i.e., by June 13, 2007); we suggest documenting to the NWB that Wolfden wishes to “adopt” the Kinross A&R Plan that is currently under review and to re-initiate that review process; make it clear that Wolfden does not submit this or suggest it be reviewed as the Final A&R Plan per Part K Item 3 of the licence but as the update called for in the NWB’s Letter of Assignment; this is in keeping with maintaining options for future operations at the site.
- Page 2/3, Restoration Liability, Wolfden is required to prepare a report on current restoration liability with subsequent annual updates; however the Letter of Assignment does not specify a date; we suggest requesting a clarification from the NWB on the timing of an update to security requirements and that Wolfden suggest to the NWB that this be deferred until after approval of the A&R Plan.
- Page 3, Enforcement, NWB asks that Wolfden contact the DIAND Inspector to obtain any enforcement documents related to the site.

### **Other Suggested Work (Lupin)**

- Track ice-free monthly water levels and water quality (4-6 samples) in the TCA Ponds
- Track ice-free monthly water levels in the sewage pond (1-2 samples)
- Conduct ice-free monthly environmental inspections
- Conduct winter environmental inspections at least every 90 days
- Read thermistors monthly through ice-free season or bi-weekly if personnel on site
- Investigate EEM Requirements for 2007
- Review 2006 Geotechnical Inspection for outstanding issues

## Attachment II – Water Licence Preliminary Assessments

### Ulu Water Licence (NWB1ULU0008), Assessment of Required Care & Maintenance Activities for 2007

#### Water Licence Title Page

- Expiry date is June 30, 2008; a renewal should be initiated in summer 2007 as recommended by the NWB (see Licence Schedule III, Part 4).
- Possible issue to raise for amendment:
  - Be clear whether this is a renewal to keep terms and conditions that allow for advanced exploration (assumed preferred approach) or whether this is an application for mining
  - Strategize how possible future mining scenarios might be facilitated through this renewal opportunity (change wording to allow mining but retain 'B' status through only 100 m<sup>3</sup>/day water use?)
  - A.1.d, consider removing this clause or resolving through the renewal
  - Resolve any discrepancies between what the licence assumes has been constructed and what is actually present on site (Glenda or Dave?)
  - Update or remove clauses D.7 through D.11 and D.19 re. studies and reports to be submitted upon initial re-activation or operations; assumed that these have all been satisfied

#### Part A: Scope, Enforcement and Definitions

- No c&m actions required.

#### Part B: General Conditions

- B.1, Water Use Fee, must be pre-paid for the coming year on each anniversary date of the licence (July 1) (also see Schedule II, Part II).
- B.2, Security, maintain standing of security (through INAC Ottawa).
- Note also the requirement of the Letter of Assignment for an update to the security requirement (see below).
- B.5, Annual Report, Annual Report for 2007 will be required by March 31, 2008.
- B.7, SNP, the SNP programs must be followed (see below).
- B.10, signs, ensure that signs are present at SNP monitoring sites.
- B.11, licence, ensure that the Water Licence is posted at the site.

#### Part C: Conditions Applying to Water Use

- No c&m actions required.

#### Part D: Conditions Applying to Waste Disposal

- D.3, TCA Discharge, notify inspector 10 days before discharge of water from ponds (is this necessary in 2007?).
- D.6.a, Ponds, freeboard >1m.
- D.6.b/c, Pond Seepage, seepage is to be minimized and pumped back "immediately".
- D.6.d, erosion, erosion is to be repaired "immediately".
- D.6.e, Pond Inspections, weekly inspections required through open-water season, suggest moving to monthly during ice-free season (6 months, May-Oct).

## Attachment II – Water Licence Preliminary Assessments

- D.7/8/9/10/11/19, Submission of Studies and Plan, assumed that these clauses are all satisfied and “compliant”.
- D.13, Implementation of Plans, double check any implications for 2007 re. the various plans and studies submitted under clauses D7-D10; assumed no work requirements for this preliminary workplan.
- D.14, Annual Review, review the various Plans and Studies and assess for any necessary changes (could be part of annual env. report).

### Part E: Conditions Applying to Spill Prevention and Contingency Planning

- E.6, Annual Review, review the Contingency Plan and assess for any necessary changes (could be part of annual env. report).

### Part F: Conditions Applying to Modifications

- No c&m actions required.

### Part G: Conditions Applying to Construction

- No c&m actions required.

### Part H: Conditions Applying to Operation and Maintenance

- No c&m actions required (assume that the Plan required under H.1 was previously submitted and approved).

### Part I: Conditions Applying to Abandonment and Restoration

- I.1, A&R Plan, assume that the Plan required under I.1 was previously submitted and approved.
- I.6, Annual Review, review the A&R Plan and assess for any necessary changes (could be part of annual env. report).

### Schedule I: Surveillance Network Program (SNP)

- A, Water Samples, 100-1 water intake at West Lake once per year.
- B, Water Samples, 200-1/2/3/4/5A/5 required monthly.
- B, Water Samples, 200-1/2/3/4/5 required weekly if receiving runoff from site ponds (is this likely?).
- B.5, Laboratory, the laboratory used should be approved by the NWB.
- C.3, Flow, flow at East Lake is to be measured “as approved by the Board” (what is required here?).
- D.1, Monthly Reports, a monthly SNP report is required for the NWB.

### Schedule II: Licencing Considerations

- I., 1/2, Renewal, application for renewal must be accompanied by a \$30 fee payment plus the water use fee for the first year of the requested term
- II, 6, Water Use Fee, payment is due in advance of each year on the anniversary date of the Water Licence (July 1).

### Schedule III: General Considerations for the Administration of Licences

- 3, Licencee should respond to and act on letters from the DIAND inspector.

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- 4, Renewal Application, NWB recommends an application for renewal be filed one year before expiry (i.e., by July 1, 2007).
- 6, SNP Modifications, the NWB can modify the SNP without a Hearing based on written application and rationale.
- 9, Submissions, all reports, plans and studies are to be submitted in triplicate.