

2BE-HOP0712 Clauses and Compliance (As of March 2012)

Clause		Compliance Status
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Part A: Scope, Definitions and Enforcement

A.1	~	N/A
A.2	~	N/A
A.3	~	N/A

Part B: General Conditions

B.1	✓	Paid for 2012
B.2	✓	2007: April 30, 2008
	✓	2008: May 29, 2009
	✓	2009: March 31, 2010
	✓	2010: March 31, 2011
B.3	✓	In compliance
B.4	✓	In compliance
B.5	✓	In compliance
B.6	✓	In compliance
B.7	~	N/A
B.8	~	N/A
B.9	✓	In compliance

Part C: Conditions Applying to Water Use

C.1	✓	In compliance
C.2	~	N/A
C.3	~	N/A
C.4	✓	In compliance
C.5	~	N/A
C.6	~	N/A
C.7	~	N/A
C.8	✓	Submitted May 29, 2009
C.9	~	N/A

Part D: Conditions Applying to Waste Disposal

D.1	✓	In compliance
D.2	✓	In compliance
D.3	~	N/A
D.4	~	N/A
D.5	✓	In compliance
D.6	✓	In compliance
D.7	✓	In compliance
D.8	✓	In compliance
D.9	✓	In compliance
D.10	✓	In compliance
D.11	✓	In compliance
D.12	✓	Submitted August 11, 2008
D.13	✓	In compliance
D.14	~	N/A
D.15	✓	Landfarm has been dismantled and NWB notified; any remaining contaminated soil to be handled as per closure plan
D.16	✓	In compliance; landfarm has been dismantled so discharges no longer occurring from this location
D.17	✓	In compliance
D.18	✓	Landfarm has been dismantled; no soil from facility will be used as remediation soil
D.19	x	Not yet applicable
D.20	✓	In compliance

D.21	✓	In compliance
D.22	✓	In compliance
D.23	✓	In compliance
D.24	~	N/A
D.25	✓	Submitted October 19, 2010

Part E: Conditions for Camps, Access Infrastructures and Operations

E.1	✓	In compliance
E.2	✓	In compliance
E.3	✓	In compliance
E.4	✓	In compliance
E.5	✓	Submitted November 15, 2007
E.6	✓	Submitted November 15, 2007
E.7	~	N/A
E.8	✓	In compliance
E.9	~	N/A
E.10	x	Not yet applicable

Part F: Conditions Applying to Drilling Operations

F.1	✓	In compliance
F.2	✓	In compliance
F.3	✓	In compliance
F.4	✓	In compliance
F.5	✓	In compliance
F.6	✓	In compliance
F.7	✓	In compliance

Part G: Conditions Applying to Modifications

G.1	~	N/A
G.2	~	N/A
G.3	~	N/A

Part H: Conditions Applying to Spill Contingency Planning

H.1	✓	Submitted September 24, 2007
H.2	✓	In Compliance
H.3	✓	In Compliance
H.4	✓	In Compliance
H.5	✓	In Compliance
H.6	✓	In Compliance
H.7	✓	In Compliance

Part I: Conditions Applying to Abandonment and Restoration or Temporary Closing

I.1	✓	Submitted September 19, 2007
I.2	~	N/A
I.3	✓	In Compliance
I.4	x	Not yet applicable
I.5	✓	In Compliance
I.6	x	Not yet applicable
I.7	x	Not yet applicable
I.8	✓	In Compliance
I.9	x	Not yet applicable
I.10	x	Not yet applicable
I.11	x	Not yet applicable
I.12	x	Not yet applicable
I.13	✓	In Compliance
I.14	✓	In Compliance.

I.15	x	Not yet applicable
I.16	✓	Submitted Jan. 24, 2011

Part J: Conditions Applying to the Monitoring Program

J.1	✓	In Compliance
J.2	✓	In Compliance
J.3	✓	In Compliance
J.4	✓	In Compliance
J.5	✓	In Compliance
J.6	✓	In Compliance
J.7	✓	In Compliance
J.8	✓	In Compliance
J.9	✓	In Compliance
J.10	✓	In Compliance
J.11	✓	Submitted December 7, 2007
J.12	✓	In Compliance
J.13	✓	In Compliance
J.14	✓	In Compliance
J.15	✓	In Compliance
J.16	~	N/A
J.17	✓	In Compliance
J.18	✓	In Compliance
J.19	✓	In Compliance
J.20	✓	In Compliance

2BE-HOP0712 Regulatory Reviews

Agency	Date Reviewed		Action Due Date	HBML action	Request
Amendment 5 Application - Windy Camp Relocation					
INAC	7/30/2010	✓	N/A	Responded 14/09/2010.	2. (...) As stated in INAC's July 23/10 review memo to the NWB concerning HBML's license amendment application to permit the discharge of quarry water, it is recommended that water use for dust suppression purposes be included in a revised license. HBML should provide the Board with the maximum total daily amount of water, indicating the purposes for its use, which may be used to support project activities.
		✓	N/A	Responded 14/09/2010.	5. HBML should revise their March 2010 Spill Contingency Plan to include spill prevention and contingency measures associated with the Windy Camp's new location.
KIA	7/20/2010	~	N/A	N/A	No Comment.
EC	7/28/2010	✓	N/A	Responded 14/09/2010.	EC does not foresee any major issues with the increased water use as long as there are proper measures in place to cope with the increase in waste water. With respect to drilling, will additional sumps be created or do the current sumps have enough capacity and are properly constructed to deal with the increased waste water? Should additional sumps be needed, are there enough suitable locations available? Page 1, Item 1.
CLEY	7/5/2010	~	N/A	Noted.	The department does not object to the project. However, the department urges the proponent to be sensitive to the fact that three known archaeological sites are situated within 500 metres of the new Windy Camp location.

Amendment 4 Application - Permit Discharge from Quarries A, B, and D					
INAC	7/23/2010	~	N/A	N/A	No action required by HBML.
KIA	7/6/2010	~	N/A	N/A	No comments.
EC	7/19/2010	~	N/A	N/A	No action required by HBML.
NWB	5/19/2010	✓	6/7/2010	Responded 03/06/2010.	First, the purpose of the Doris-Windy road is unclear as the application simply states that the road will be used to support further exploration of the Hope Bay Belt. In order to determine whether it is procedurally correct to process this application as an amendment to Type B Licence 2BE-HOP0712, rather than as an amendment to HBML's Type A Licence for Doris North 2AM-DOH0713, the NWB asks that HBML provide further information on the exact uses of the road, and, how the new road fits with future development plans for the Hope Bay Area and the Doris North site in particular. Pg. 1, paragraph 5.
		✓	6/7/2010	Culvert and Bridge questionnaire not completed. See letter of 03/06/2010 for additional info.	Second, based on Figure 2.1 (SRK August 2008), there appear to be potential stream crossings required for the all-weather road. HBML is asked to confirm whether stream crossings are required and, if so, to submit the information required in the NWB's Culvert and Bridge Questionnaire. Pg. 2, paragraph 5.

Amendment 3 Application - Drilling Water Source					
EC	6/28/2010	~	N/A	N/A	No action required by HBML.
DFO	6/28/2010	~	N/A	N/A	No action required by HBML.
INAC	6/28/2010	✓	N/A	E-mailed response 08/07/2010.	2. If HBML's proposed 2 cm draw down threshold is considered, HBML should, -describe how they will monitor draw down conditions in excess of 2 cm when source water bodies are ice free and ice-covered; -outline the timeframe used to determine if water levels will decrease by 2 cm (e.g., daily, weekly, monthly, or the duration of drilling activities); and, -maintain records of water levels.
		✓	N/A	E-mailed response 08/07/2010.	3. The submitted license amendment application does not specify a minimum depth for the selection of source water bodies that can be used to support their drilling operations. This information should be provided. The environmental effects of drawing water from water bodies with shallow depths may be greater than for those that are deeper (and consequently, have larger volumes of water).
KIA	6/15/2010	~	N/A	N/A	No comments.
NWB	5/19/2010	✓	N/A	Submitted 20/05/2010.	(...) the NWB anticipates the submission of a translated executive summary as previously requested by email dated May 14, 2010. Pg. 2, paragraph 3.

2008 Annual Report					
		✓	N/A	Responded 05/08/2009. An updated version of the Spill Contingency Plan was submitted to the NWB on 30/09/2009.	1. On page 3 of the submitted Annual Report Form HBML states that "The body of the Spill Contingency Plan submitted in October 2007 has not been modified or revised. New contact names and numbers are set out at Item 3 of the attached supplement." This Plan should be modified / revised to include current information. This is in accordance with Part B, Item #2(v.) which reads "An up-to-date copy of the Spill Contingency Plan, including contact information." See Results of Review.
		✓	N/A	Responded 05/08/2009.	2. In Part F, Item #4 of the licence, the NWB requests that HBML provide permafrost depths along with drill hole locations in Annual Report submissions. It is stated in the supplemental information report that, "The majority of drill holes in the Hope Bay Belt do not go deep enough to penetrate below the permafrost layer. For the Hope Bay Project, depth of permafrost is therefore calculated using thermistor strings that measure ground temperature, installed mainly in geotechnical drill holes. Results are used to extrapolate the lower depth of permafrost using thermal gradient. There are several such thermistor strings throughout the Hope Bay Belt and measurements are taken on an on-going basis." For information purposes, it would be helpful if any information related to permafrost depths could be provided in Annual Report submissions as requested by NWB in this license condition. See Results of Review.

INAC	7/20/2009	✓	N/A	Submitted 12/08/2009.	3. According to Appendix A of the Supplemental Document, HBML's sample results for their Oct. 6/08 toxicity tests demonstrated that effluent discharges from the wastewater treatment facility at HOP-3 was not acutely toxic. The test procedures identified in Part J, Item #3 of the license were followed. The test results are not included in the Annual Report submission. Part B, Item #2(ii.) of the License requires Annual Reports to include a summary of all information requested and results of the Monitoring Program. Therefore, HBML has not fulfilled this license requirement. See Results of Review.
		✓	N/A	Responded 05/08/2009.	4. In Appendix B of the Supplemental Document, HBML's letter to Melissa Joy, INAC Water Resources Officer (dated Aug. 1/08), it is stated that "SRK Engineering was contracted to undertake a Phase 2 Environmental Assessment of the Major Patch Lake Shop during the summer of 2008 in order to determine the nature of environmental impacts that may be associated with the shop, lay down areas, and tank farm." This letter goes on to say that "SRK Engineering will perform a geotechnical engineering evaluation of the rutting of the Windy Lake / Narrtuk [sic] Winter Road." This information should be communicated with the Board and incorporated into any modifications / revisions to the project's Closure and Reclamation Plan. See Results of Review.
		✓	8/28/2009	Responded 05/08/2009.	1. INAC is requesting that HBML provide a Plan of Action with a firm timetable of implementation that addresses the above-noted deficiencies with this Annual Report. The Plan should be submitted no later than Aug. 28/09. See Conclusions / Recommendations.
		✓	N/A	Submitted 24/01/2011.	2. INAC recommends that HBML revise their September 2007 Closure and Reclamation Plan to reflect their ownership of the Windy Lake Camp, the results of SRK Engineering environmental assessment review findings, and details associated with the closure and reclamation of the landfarm facility. It is noted that HBML's May 26/09 letter to the NWB made known they have consolidated their camp facilities at the Doris Camp and that they intend to close and decommission the Windy Camp. See Conclusions / Recommendations.

Decommissioning of Windy Lake Camp and Patch Lake Drill Maintenance Facility

INAC	7/17/2009	✓	N/A	Responded 05/08/2009. In compliance.	1. INAC has not objections to HBML's intention of closing and decommissioning their Windy Lake Camp and partially decommissioning their Patch Lake Drill Maintenance Facility. It is noted that "pending the closure and decommissioning of the Windy Camp and Patch Lake Facility, compliance will be maintained with the condition for camps, access infrastructures, and operations under Part E of the Water License." See C. Comments / Recommendations.
		✓	N/A	Responded 05/08/2009.	2. It is recommended that the revised Abandonment and Reclamation Plan include a schedule of implementation with anticipated timelines. See C. Comments / Recommendations.
		✓	N/A	In compliance.	3. HBML must continue to follow all applicable license terms and conditions throughout all decommissioning and closure activities associated with their Hope Bay Regional Exploration Project. See C. Comments / Recommendations.

Monitoring Reports

INAC	8/20/2009	✓	N/A	Responded 04/09/2009.	2. (...) INAC is requesting that HBML provide their A&R Plan/Report which must include a detailed description, including photo documentation, of the closure and decommission work carried out at the former landfarm site. This Plan/Report must demonstrate that the Board's abandonment and restoration requirements have been met. See B. Results of Review.
		✓	N/A	Responded 04/09/2009.	3. Water samples taken from Monitoring Station (MS) # HOP-5, "Accumulated Effluent from the Windy Camp Bulk Fuel Storage Facility," met the Part D, Item #17 license discharge criteria with the exception of lead which had a value of 0.00104 mg/L (the criteria is 0.001 mg/L). HBML states that "no water removal from MS #HOP-5 occurred during the period. The water in the berm will be run through an oil/water separator and filtration system and the treated effluent will be sampled." INAC requests HBML to advise the NWB and INAC as to where this treated water will be stored for analysis prior to release. Furthermore, a written notice must be provided to the INAC Inspector and Board at least 15 days prior to any planned discharges of water originating from this Bulk Fuel Storage Facility, along with the volume proposed for discharge and location as per Part D, Item #15, of the license. See B. Results of Review.
		✓	N/A	In compliance.	5. A June 17/09 HBML inspection of drill sites on the Doris and Patch Lakes revealed small spills and leaks of hydrocarbon based and non-hydrocarbon based fluids. HBML cleaned these areas and is in the process of reviewing their post ice drilling clean-up procedures. INAC recommends that HBML develop spill prevention measures for all project activities that require the use of hazardous materials. See B. Results of Review.
		✓	8/28/2009	Responded 04/09/2009.	INAC requests HBML to submit a Plan of Action by Aug. 28/09 that states how they will address the above-noted comments/recommendations provided in Part B, Item #s 2, 3, and 5 of this memorandum. See 6. Conclusion.
INAC	12/22/2008	✓	3/1/2009	Windy Camp was closed 23/10/2008 and so HBML has not been able to report on this question.	1) INAC recommends that Miramar Hope Bay Ltd indicate in their next month's monitoring report whether the accelerated sludge removal schedule, as quoted under comment 1, was successful in resolving the exceedences reported in the 2008 October Monthly Monitoring Report. See Recommendations.
		✓	3/1/2009	No cause for elevated lead was given in the monthly SNP reports. The next sampling event/discharge took place in July 2009 and lead levels were below discharge levels at that time.	2) The Licensee should investigate and report in next month's monitoring report the cause of the elevated levels of lead. See Recommendations.
		✓	N/A	In compliance.	3) As required in Part J Item #7 of the license, in future monitoring reports the Licensee should include the daily quantities of effluent discharged at Monitoring Stations HOP-3, HOP-5 (Effluent pumped from HOP-5), and HOP-6 (Effluent discharged from HOP-6). See Recommendations.
		✓	N/A	In compliance.	4) Miramar Hope Bay Ltd should record the quantities in cubic meters of sludge removed from the WWTF. (Part J Item #8). See Recommendations.

Land Farm Abandonment and Restoration Plan

NWB	10/7/2008	✓	12/7/2008	<p>Although no response was written in reply to this NWB request, an update to the landfarm reclamation process was provided on 21/06/2010, as part of an update on the overall closure and reclamation plan for Windy Camp. HBML's response letter makes reference to the NWB letter of 07/10/2008. A summary of the closure of the landfarm is included in the Windy Camp reclamation plan submitted 24/01/2011.</p>	<p>As Newmont has indicated that the landfarm is being decommissioned, it is necessary that Newmont submit to the board an Abandonment and Restoration Plan specific for the landfarm. This Plan should deal entirely with the final abandonment and restoration plans for the Windy Lake landfarm and shall be submitted within sixty (60) days of the date of this letter. The Abandonment and Restoration plan for the Windy Lake landfarm shall detail:</p> <ol style="list-style-type: none"> 1. Abandonment and Restoration procedures that are site-specific to the Windy Lake Landfarm; 2. Treatment and disposal procedures for all remaining soils within the landfarm; 3. Disposal plans for all construction materials including the landfarm berm, liner and any other materials used in the construction and operation of the landfarm; 4. A plan to test and, if necessary, remediate the soil beneath and around the landfarm; 5. How the natural contours of the land will be restored in any disturbed areas associated with landfarm operations; 6. Plan, if required, to restore the natural drainage patterns for areas disturbed by landfarm operations; 7. A plan for final inspection of the landfarm site including plans for documentation and photographs that will be submitted to the NWB. Pg. 1, paragraph 2.
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Emergency Amendment for Water Use

GN DoE	4/27/2009	~	N/A	N/A	No comments.
INAC	4/23/2009	~	N/A	N/A	No action required by HBML.
KIA	4/22/2010	~	N/A	N/A	No comments.