



FW: RECLAIM Version 8 - Red Flag Review - LWB staff Initial Comments

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Subject: RECLAIM Version 8 - Red Flag Review - LWB staff Initial Comments

Hi Bill and Andrew,

Although we anticipate additional engagement and opportunity to provide comments prior to implementation in the NWT, LWB staff flagged a few things in review of the 'red flags' RECLAIM V8 and associated Manual that we would like to pass along:

- "FCR" acronym defined in Manual however not used in remainder of document except as FCRP - should this be defined instead?
- Table 2 uses the acronym "IMCP" - should this be ICRP?, Otherwise, IMCP requires defining.
- Unclear why ".." included at the end of Inflation definition
- Section 4.2.8 describes "Additional RECLAIM descriptions", this section outlines expectations of indirect costs. It appears this outlines the expectations/assumptions that went into the percentages outlined in section 4.3, this should be explicitly stated. Otherwise, it could be interpreted as additional costs that need to be added (e.g., engagement in consideration of risk communication).
- Section 4.2.8.3 describes indirect 'Monitoring and QAQC' costs. Based on this description it is unclear the difference between monitoring costs captured here and those included in the PostClosure direct costs tab. In addition, it is unclear where active closure monitoring (i.e., not ICM or post-closure) would be captured.
- Section 4.3 - proposes that % of direct cost is calculated based on the phase of project. Has further consideration been given to instead linking this to advancement of closure planning?
- Section 4.3 - Currently companies often apply different contingency percentages to different components, has GNWT considered whether this would be appropriate for other indirect costs? (e.g., one component may be at construction phase, while another is in late production or is this an overall project classification).
- Table 3 identifies recommended percentages allocated to phases of a mining project. It is unclear the assumptions surrounding ICM. If a project enters C&M from early production, it is unclear whether the reduced percentage for engagement, for example, would be a reasonable expectation?
- Table 3 - Would the expectation be that a proponent submits a workbook for each phase? At minimum, it appears this would be necessary for the Construction vs Early Production to ensure that adequate security is held to reflect on site liability.
- The "Clear All" macro function does not appear to work
- Pg 26 of Manual states "Another function within this menu is to hide or display segregation columns within the worksheets that ascribe the costs to either 'water' or 'land' liability." It is unclear where this function is in RECLAIM.
- Pg 27 of Manual references the "inflate function". It is unclear where the "Inflate function" is in RECLAIM

- Section 5.3.1 describes that cell B3 of Unit_Costs tab should be able to be updated to current year to calculate escalation, this function does not appear to work. Error message states "Invalid year. Please enter a year between the present year and 2024."
- Future value (as calculated in the Summary tab) is not discussed in the body of the Manual (only in Appendix A on pg 35), its purpose and potential application should be clearly outlined as identified as a large change in Appendix A.
- Appendix A, Table 4 includes Contingency percentages of 20% for RECLAIM V7 and 25% for V8. It is unclear what this is based on as both have similar guidance ranging from 5 to 25% based on level of detail provided.

Please don't hesitate to reach out with any questions!

Masi,

Meghan Schnurr (she/her)

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