



Snap Lake Environmental Monitoring Agency
Main Floor, Lahm Ridge Tower
4501 Franklin Avenue
P.O. Box 95, Yellowknife, NT X1A 2N1
Phone: 867-765-0961 FAX: 867-765-0963
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Laurie McGregor
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Conservation, Assessment and Monitoring
Department of Environment and Natural Resources
Government of the Northwest Territories
P.O. Box 1320, Yellowknife, NT X1A 2L9

November 27, 2014

Subject: De Beers 2013 Environmental Agreement Annual Report

Dear Ms. McGregor,

Snap Lake Environmental Monitoring Agency (SLEMA) has reviewed the 2013 Environmental Agreement Annual Report (EAAR 2013), and would like to provide the Department of Environment and Natural Resources (ENR) the following comments.

De Beers adequately summarized the monitoring activities and results for 2013, and improved the report presentation by adding three photos of the North Pile, which show changes from 2011 to 2013. However, De Beers failed to acknowledge the non-compliance event that happened in 2013.

De Beers reported the exceedance of Chloride, which occurred in September and October 2013, in Table 2-1 (page 7) and Section 4.1.10 (page 60), but did not mention it in Section 5 (Summary of Compliance), Section 7 (Summary of Mitigative Measures), and Section 9 (Summary of Public Concerns). SLEMA believes that the exceedance event is a non-compliance against the Water Licence, Part F, Item 9, and should be reported in detail in Sections 5, 7 and 9, even if De Beers was able to re-establish compliance in a timely fashion.



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There is one statement about Mitigative Measures in the Executive Summary that

- *"The AEMP annual report demonstrates that the Snap Lake Mine's impact is similar to what was predicted in the Environmental Assessment. This demonstrates that the mitigative measures being used by De Beers are working effectively. Two response Framework levels were triggered in the 2013 AEMP. Response Plans were also submitted in 2013 for TDS, Strontium and Nitrogen. A Water License Amendment request was submitted in December 2013 to change water license effluent quality criteria for Total dissolved solids and its constituent ions."*

The two underlined sentences are contradictory. If mitigative measures were effective, De Beers would not have had to request to amend the water licence limits in December 2013.

If you have any questions whatsoever please feel free to contact Philippe di Pizzo at 867-765-0961 / exec@slema.ca.

Sincerely,

A handwritten signature in black ink, appearing to read 'J. Weyallon'.

Johnny Weyallon
Chairperson