



May 2015
Environmental Update
for SLEMA Board

Zhong Liu
May 31, 2015

Outline

1. Mine Update
2. Inspection Update
3. Regulators' Update
4. Aboriginal Update
5. Stakeholders' Update
6. Agency's Activities
7. SLEMA Reviews
8. Water Licence Amendment Application



Acronyms

- AANDC – Aboriginal Affairs and Northern Development Canada
- AEMP – Aquatic Effects Monitoring Program
- ARD – Acid Rock Drainage
- DFO – Fisheries and Oceans Canada
- CCME – Canadian Council of Ministers of the Environment
- CEQG – Canadian Environmental Quality Guidelines
- EC – Environment Canada
- ENR – Department of Environment and Natural Resources, GNWT
- EQC – Effluent Quality Criterion
- GNWT – Government of the Northwest Territories
- MVLWB – Mackenzie Valley Land and Water Board
- PK – Processed Kimberlite
- SLEMA – Snap Lake Environmental Monitoring Agency
- SNP – Surveillance Network Program
- SSWQO – Site-Specific Water Quality Objective
- TDS – Total Dissolved Solids
- WEMP – Wildlife Effects Monitoring Program
- WTP – Water Treatment Plant
- WMP – Water Management Pond

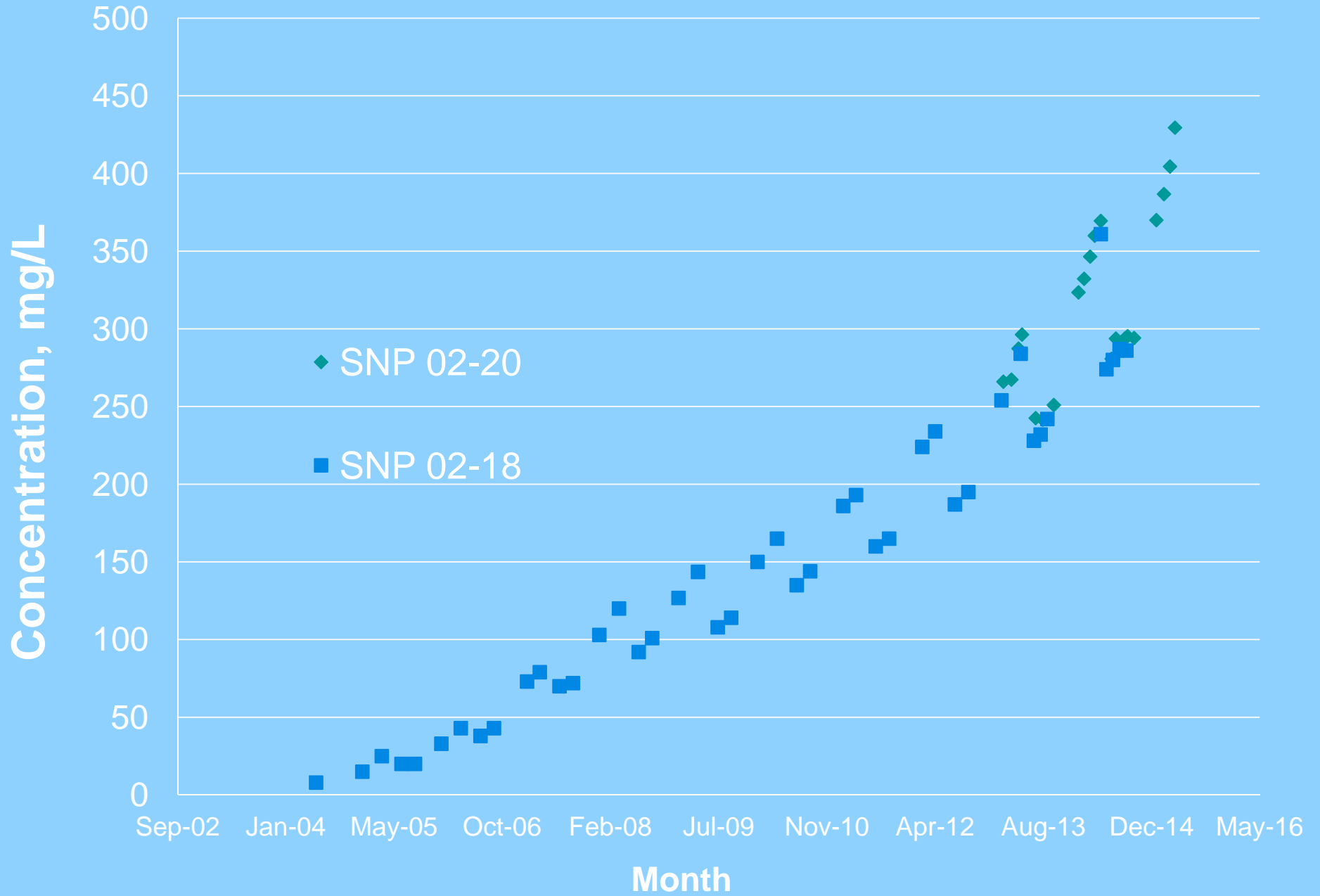


1.1 Mine Update – April 2015

- Production rate: 100% of its capacity (94,495 tonnes of kimberlite processed)
- 22,033 m³ of water withdrawn from Snap Lake
- 1,409,777 m³ of treated water discharged into Snap Lake
- 79,325 tonnes of coarse reject and 51,555 m³ of slimes deposited in the North Pile
- No reportable spills
- Water sampled in 7 monitoring stations
 - The monthly average for all parameters met compliance
 - TDS concentration at SNP 02-20 (diffuser stations) was 429.5 mg/L



TDS Levels in Snap Lake



1.2 Spill Reporting in May 2015

Date	Location	Waste Spilled	Amount (L)	Cause
May 3	Sewage Treatment Plant	Partially treated sewage	30	The plant experienced power loss to the control panel



1.3 2014 AEMP Annual Report

- Submitted on May 1, 2015
 - The goal of the AEMP is to address potential Mine-related effects to the aquatic ecosystem of Snap Lake in a scientifically defensible manner
 - The Annual Report summarizes the monitoring results in 2014



1.4 2014 Hydrology Annual Report

- Submitted on May 8, 2015
 - This report summarizes the 2014 water elevation stream flow, and water balance measurements and calculations at the Snap Lake Mine



1.5 AEMP Summary Brochure

- Submitted on May 11, 2015
 - In response to stakeholder concerns over the length and technical nature of the Aquatic Effects Monitoring Program 2014 Annual Report, De Beers developed this summary brochure



1.6 Grout Curtain Installation

- Notification dated May 15, 2015
 - De Beers intended to carry out grout curtain installation for the West Cell Development beginning May 20, 2015



1.7 2014 Vegetation Annual Report

- Submitted on May 15, 2015
 - A Vegetation Monitoring Program (VMP) is a requirement of the Mine's Environmental Agreement and provides support for the closure and reclamation monitoring requirements of the Mine's Water Licence
 - A VMP was first prepared for the Mine in 2005. A subsequent VMP was prepared in 2008 and again in 2013. next one will be in 2018 and every five years thereafter
 - Dustfall monitoring results in 2014 are presented in the Annual Report



1.8 2014 Air Quality Meteorology Monitoring and Emissions Annual Report

- Submitted on May 29, 2015
 - This report provides the results of the air quality and meteorological monitoring programs that were active at Snap Lake during 2014



2. Inspection Update

- Inspector – Jamie Steele
- Water Licence Inspection
 - April 8 and 9, 2015



2.1 Response to SLEMA Letter on May 4, 2015 (I)

➤ Dated May 11, 2015

- “The Inspector appreciates the recommendation and the model data presented in your letter; however, cannot initiate an investigation based on model predictions. The Inspector will need to review the data received under the Surveillance Network Program to determine whether there has an exceedance at SNP 02-18. should an exceedance be reported the Inspector would initiate a confirmatory sampling program to determine the extent of non-compliance, and if necessary conduct an investigation.”



2.1 Response to SLEMA Letter on May 4, 2015 (II)

- “Pursuant to conditions under the recently approved amendments to Water Licence MV2011L2-0004 the maximum whole lake average concentration of 350 mg/L Total Dissolved Solids is no longer a requirement for Snap Lake Mine; therefore, the Inspector does not expect a water licence exceedance to be reported in the next SNP report.”

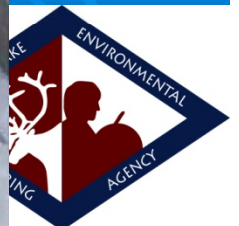


2.2 Water Licence Inspection

- Inspection conducted on April 8 and 9, 2015, and reported on May 12, 2015
- Inspected Winter Road Portage 1 spill site for NT Spill #15-043, Winter Road equipment storage laydown, North Pile West Cell grout curtain construction, Staging Area for the components of the Reverse Osmosis Water Treatment Plant, Underground grouting activities, Underground Refuelling Station, and Underground Lube Bay
- One concern was noted – Underground Refuelling Station
 - An issue with spills and the previous two inspections showed the containment sump was full with no additional capacity for containing potential spills



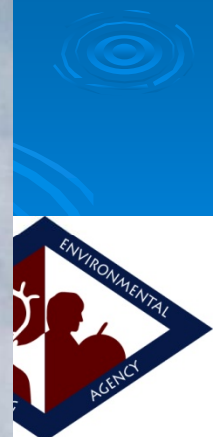
NT Spill #15-043 – Some hydrocarbon contaminated soil remains in between the rocks. The site will remain open until winter 2015 to allow for further assessment of the spill and possibly more clean-up activities once the ground thaws



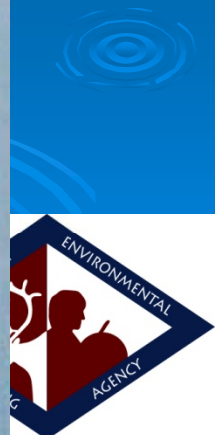
Winter Road Equipment Storage – Drip trays stored under equipment catch small leaks and drips allowing for easy clean-up



Winter Road Equipment Storage – Some of the equipment being stored are leaking fluids onto the ground requiring adjustment of the dip tray to ensure they are effective. Contaminated snow will need to be cleaned up and disposed of



North Pile West Cell – Organics have been stripped back for the grouting program. Organics will eventually be collected and moved to the organics storage area. In this area, the organics have been placed in close proximity to Snap Lake. this material will need to be collected and moved prior to spring freshet



Reverse Osmosis Water Treatment Plant – Inside one of the seacan shipping containers



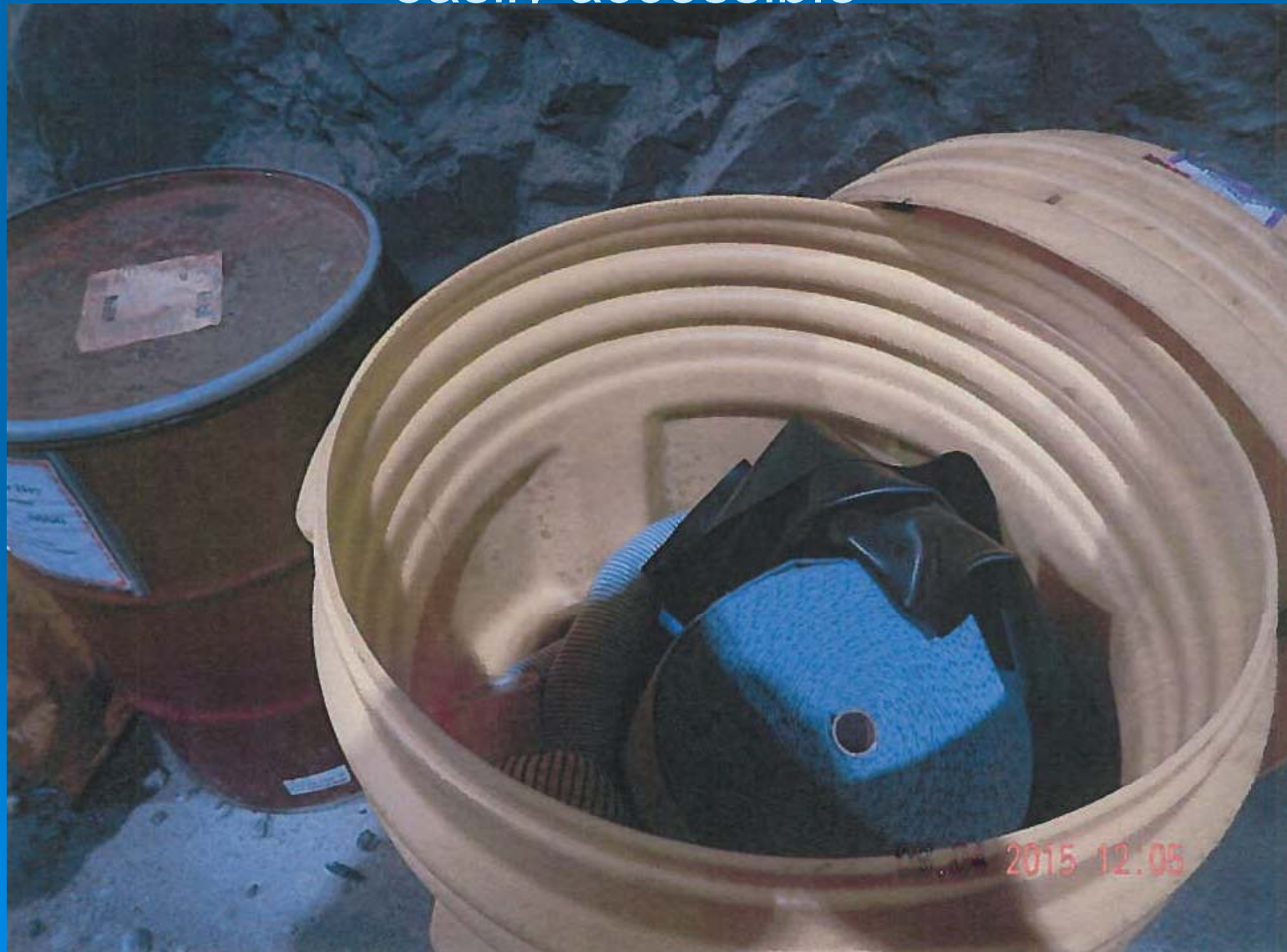
Underground 4950 S2 Ramp North – MDR drill set up at the lower ore development. This drill is used for the grouting program underground as well as for delineation of ore in the mines footwall



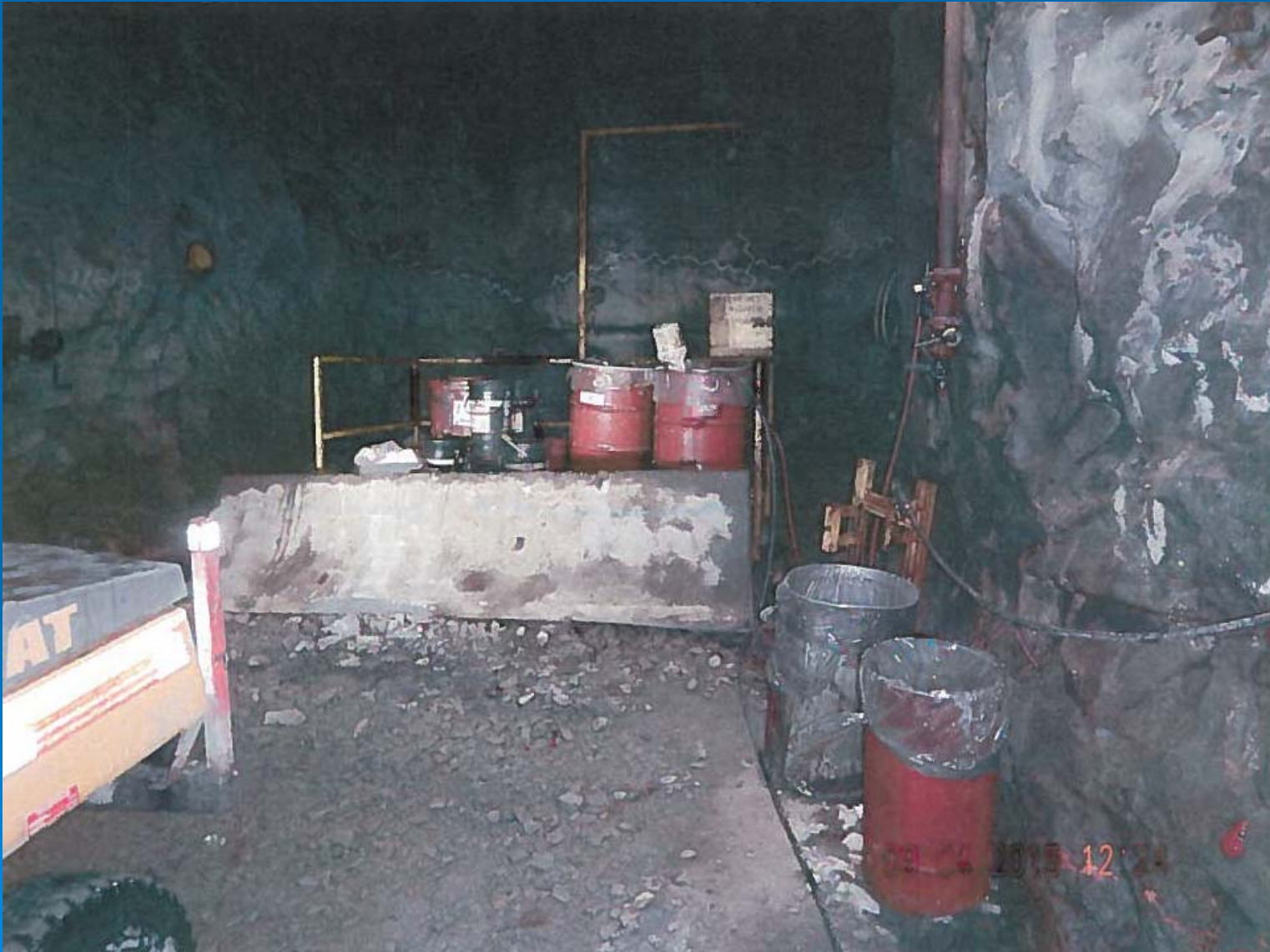
Underground Refueling Bay – Containment sump in the floor and overflow containment tray are full of diesel fuel and need to be emptied to ensure that it is available to contain potential spills



Underground Refueling Bay – Spill kit in the area was stocked with absorbent materials and was easily accessible



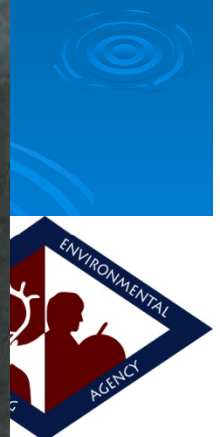
Underground Lube Bay – Barrels of different lubricants are stored on a large containment tray behind a concrete barrier. The area was neat and clean



Underground Lube Bay – Spill kit was located behind the containment tray and was not easily accessible. The Kit appeared to be used as a waste container. This waste will need to be dealt with appropriately. The Kit will need to be restocked and moved to an area where it can be easily found and accessed



Underground Lube Bay – Grease drippings along the wall and ground. These drips will need to be cleaned up and some of containment set up to collect the grease dripping from the hanging hoses



2.3 LUP Inspection

- Dated, 2015
- Inspected the winter road, waste management, and spill management
- One environmental risk noted
 - The potential for traction issues on Portage 1 and perhaps 4



3. Regulators' Update – MVLWB (I)

- Approves the 2014 Emergency Response Plan v2, as submitted in accordance with the Water Licence, on May 7, 2015
- Invited reviewers to submit comments on AEMP - C. dubia low action level Response Plan, on May 8
 - Comments due on June 12
- Invited reviewers to submit comments on 2014 Annual Closure and Reclamation Plan Progress Report, on May 20
 - Comments due on June 19



3. Regulators' Update – MVLWB (II)

- Invited reviewers to submit comments on 2014 AEMP Annual Report, on May 21, 2015
 - Comments due on July 2
- Reviewed the Cesium and Thallium Response Plan on May 26 and did not approve the Plan as submitted, and required De Beers to incorporate the reviewers' comments into the Plan and resubmit the Plan by June 30, 2015



4. Aboriginal Update

- No comments received in May 2015



5. Stakeholders' Update

- Environment and Natural Resources (ENR) Commented the AEMP low action level triggered for aesthetic drinking water - Chloride on May 15, 2015
- ENR and Environment Canada (EC) commented the Water Licence 2014 Annual Report (WLAR 2014) on May 20



5.1 ENR Comments on AEMP low action level triggered for aesthetic drinking water - Chloride

- No comments or recommendations at this time



5.2 ENR Comments on WLAR 2014 (I)

- “ENR requests clarification on the current status of water management as it relates to the use of freshwater dilution as a mitigation measure. It is unclear if this strategy is warranted in order to achieve the interim EQC (850 mg/L average, 1003 mg/L maximum)”
- “ENR requests additional clarification regarding the TSS exceedances at S 02-17B”



5.2 ENR Comments on WLAR 2014 (II)

- “ENR requests additional information regarding the triggering of an action level related to nitrate at SNP 02-02 and the circumstances surrounding it. This information should be included in the Annual Report and any future Annual Reports in which such events occur”
- “ENR requests an update on the current status of investigation or activities relating to paste backfill be provided to the Board and reviewers”



5.3 EC Comments on WLAR 2014 (I)

- EC recommends the Proponent clarify whether these locations (SNP 02-04, 02-05, 02-06, 02-07, 02-08, 02-09) discharge freely into the environment or if runoff is collected and treated prior to discharge. Due to the elevated concentrations on parameters at some of these SNP locations they should not be discharging directly to the environment. This information should be provided clearly in the report



5.3 EC Comments on WLAR 2014 (II)

- As the concentrations of nitrate at these locations (SNP 02-04 and 02-09) has been elevated for several consecutive years, EC recommends that the Proponent provide recommendations for management
- EC recommends the Proponent provide all SNP sampling locations on Figure 5-2 as the specific locations aid in interpretation of results



6. Agency's Activities (I)

- A letter on the potential TDS non-compliance was sent to the Inspector on May 4, 2015
 - The Inspector responded on May 11
- A comment letter on the Water Licence 2014 Annual Report was sent to the MVLWB on May 19
- Staff Philippe di Pizzo and Zhong Liu presented SLEMA at the Career Fair in Lutsel Ke on May 22



Career Fair in Lutsel Ke on May 22, 2015



6. Agency's Activities (II)

- SLEMA Executive Meeting held on May 25, 2015
 - Rachel Crapeau appointed as the Chairperson
 - Johnny Weyallon appointed as the Vice Chairperson
 - Arnold Enge appointed as the Treasurer
 - Charlie Catholique appointed as the Secretary



7. SLEMA Reviews

- SNP 02-20 Data Analysis
- 2014 Water License Annual Report
 - Geotechnical Monitoring Program Summary for the Period 1999-2014
 - Acid/Alkaline Rock Drainage and Geochemical Characterization Plan Adaptive Management Action Levels
 - Summary of September 2014 Geotechnical Site Inspection of North Pile Facility and Water Management Pond Dams
 - Acid/Alkaline Rock Drainage (ARD) and Geochemistry Characterization 2014 Annual Report
- Ceriodaphnia Dubia Low Action Level Triggered – Context, Significance, and Recommendation
- 2014 Hydrology Annual Report

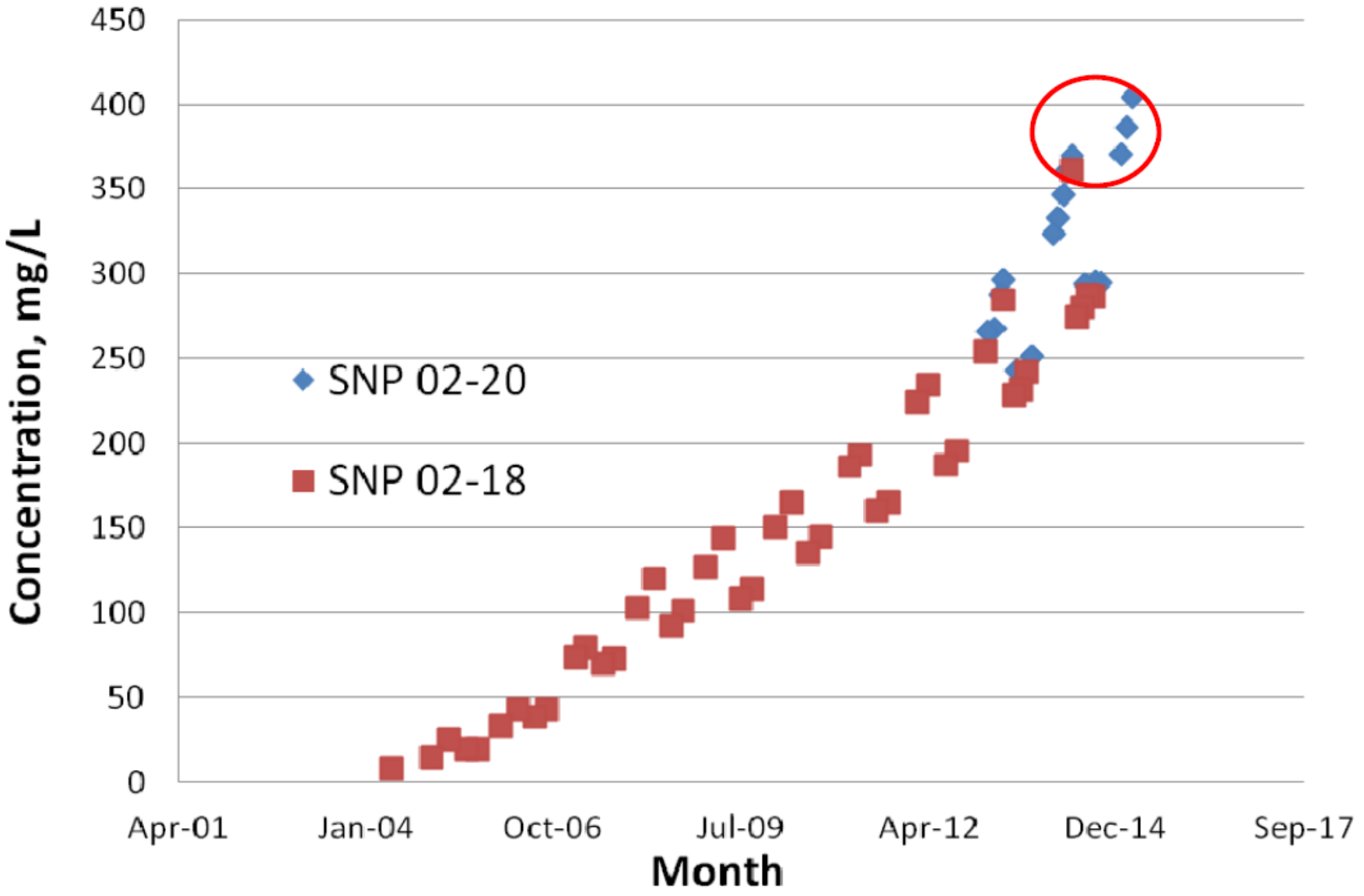


7.1 SNP 02-20 Data Analysis

- TDS data at SNP 02-20 from the January, February and March 2015 SNP Monthly Reports were analyzed
- TDS level at SNP 02-18 may have exceeded the current water licence limit of 350 mg/L since January 2015
- It is recommended that the Inspector initiate an investigation to confirm De Beers' compliance to its water licence



TDS Levels in Snap Lake



Response from the Inspector

- A letter was sent to the Inspector on May 4, 2015, and the Inspector responded on May 5, 2015 that
 - “I appreciate the recommendation from Mr. Weyallon, and will take it under advisement until the whole lake average sample data become available for review.”



7.2 Geotechnical Monitoring Program Summary for the Period 1999-2014

- This report is the most-recent in a series of the annual reports to be prepared as part of the geotechnical monitoring program at the Site. Future data collection and analyses will identify trends and provide information to De Beers that will contribute to the adaptive management of the Site



Key Results and Comments (I)

- In general, the survey prisms installed on the North Pile perimeter embankments indicate displacements within the range expected for stable embankments
- The conditions at the North Pile thermistors that are outside the areas of active deposition show no notable variations since their installation. These conditions are expected and confirm that the locations of the instruments are not influenced by the development of the North Pile to date. Future development of the North Pile will influence the locations within and near to the East Cell and West Cell



Key Results and Comments (II)

- The installation of thermistors into the deposited materials is planned by De Beers and will be advanced in due course and in consideration of development activities. These thermistors will enable the monitoring of the temperatures within the deposited materials above the underlying ground. The active layer or cryotic ground depths within the North Pile deposited material cannot be accurately identified without this thermistor data



Key Results and Comments (III)

- The water levels of the piezometers between the East Cell and the shoreline of Snap Lake are generally below that of Snap Lake (El. 444.1 m±). This indicates a slight hydraulic (groundwater) gradient from Snap Lake towards the East Cell. The design and operation of the East Cell perimeter water control structures further induces a hydraulic gradient from Snap Lake into the ditches and sumps. The monitoring results indicate that the design and operation of the East Cell perimeter water control structures are promoting a hydraulic gradient towards the North Pile from Snap Lake as per the design; this is considered to be acceptable



Key Results and Comments (IV)

- Some of the North Pile embankment deformation monitoring indicates initial movement due to freezing and thawing followed by limited movement. These results are expected given the climate of the Site



Recommendations

- De Beers must improve the QC and QA measures in all future thermistor monitoring and reporting
- The replacement of the following thermistors is recommended: TH06-01, TH06-03, TH06-04, and TH08-14
- The installation of piezometers and thermistors in the West Cell area, prior to its development
 - De Beers confirmed that it is planning to install these instruments during early 2015



Comments from the Environmental Analyst

- No concerns are raised



7.3 Acid/Alkaline Rock Drainage and Geochemical Characterization Plan Adaptive Management Action Levels

- Adaptive management is undertaken in the Geochemical Characterization Plan through monitoring effects (i.e., operational mine rock management monitoring and bi-annual site inspections), and the setting of action levels
- Action levels trigger a management response. The action levels are assigned varying thresholds (low, moderate and high) and each corresponding management response builds upon the previous levels response. In some cases, a progression of thresholds from low to high action levels provides a staged response



Comments from the Environmental Analyst

- No concerns are raised for the action levels and management responses presented



7.4 Summary of September 2014 Geotechnical Site Inspection of North Pile Facility and Water Management Pond Dams

- This report, prepared by Golder Associates Ltd., summarizes the September 2014 geotechnical inspection of the North Pile facility and the water management pond (WMP) dams



Water Management

- The conditions observed during the geotechnical inspection indicated that the water management being performed by De Beers is in keeping with the design intent and operational requirements of the facilities
 - De Beers performs regularly-scheduled manual surveying of the water levels of the North Pile sumps and the WMP; this is considered to be good practice for the monitoring of the facilities to aid in identifying when pumping activities are required and forms part of the regular visual inspection of the facilities
 - The water levels in the North Pile sumps observed at the time of the geotechnical inspection were, in general, at or close to the minimum practicable levels
 - The water level observed in the WMP at the time of the geotechnical inspection indicates that De Beers is actively managing to keep it as low as practicable as part of regular operations



North Pile OMS Manual

- The North Pile OMS manual was reviewed during the geotechnical inspection; the current revision is dated July 2013. The document was found to be incomplete (lacked attachments) and out-of-date (e.g., no reference to reconfigured East Cell embankments). Golder recommends that De Beers update the OMS manual immediately



Geotechnical Monitoring Program

- A geotechnical monitoring program for the North Pole facility and the WMP dams is in-place
- Data are being collected by De Beers; however, there are continued deficiencies in the collection, interpretation, and use of the data



Placement of the Erosion Protection Layer in the Ease Cell

- The placement of the erosion protection layer is lagging for the majority of the embankments; most notably, those of the East Cell. It is recommended that this layer be placed to properly protect the completed embankments as erosion channels have formed and scoured the embankment slopes. If not rectified, erosion may continue to form or enlarge scoured areas and result in localized or larger instability issues. Further, it is recommended that the erosion protection layer be placed coincidently with embankment construction. The placement of this layer and its placement in conjunction with embankment construction: reduces the risk of embankment erosion; reduces effort; improves schedule; enhances safety; and reduces the cost to do the work. De Beers stated (also see De Beers 2014) that the placement of the erosion protection layer will start immediately and will, as progress is made, be placed concurrently with embankment construction





Dam Safety Review

- De Beers is considering having a dam safety review performed for the North Pile facility. A dam safety review is suggested by the Canadian Dam Association to be performed every seven years of full-scale operation for facilities such as the North Pile facility given its consequence classification of “high” (refer to the North Pile OMS manual). Golder is supportive of the dam safety review and looks forward to participating in the process. Golder recommends that the dam safety review of the North Pile facility and the WMP occur in 2015. It is important to note that a dam safety review must be performed by a professional engineer that has not participated in the design, construction, or inspection of the facilities



Golder's Additional Comments

- Golder observed PK on the ground at the load-out at the process plant and along the haul route to the North Pile. It is appreciated that spillage during loading and hauling occurs during normal operations; however, it is suggested that De Beers develop methods and practices to reduce the spillage PK. De Beers does perform regular clean-up of the spilled PK. It is recommended that De Beers clean-up the spilled PK before the onset of winter conditions
- Golder suggests that De Beers install protection, marking, and barriers for surface pipelines (PK distribution and water) along the roads to reduce likelihood of damage



Comments from the Environmental Analyst

- No concerns are raised
 - All 14 recommendations and 3 suggestions are supported



7.5 Acid/Alkaline Rock Drainage (ARD) and Geochemistry Characterization 2014 Annual Report

- The 2014 Annual ARD and Geochemical Report summarizes the acid/alkaline rock drainage (ARD) and geochemical conditions observed at the Mine between January 1 and December 31, 2014



Geochemical Site Inspection

- The components of the site inspection in September 2014 include:
 - a visual seepage survey of waste storage areas, including the kimberlite ore stockpile, North Pile facility and the WMP;
 - a runoff survey of bogs and receiving waters downgradient of site facilities; and,
 - a geochemical inspection of mine rock deposition or disturbance areas for signs of incipient acid generation and collection of supplemental mine rock samples
 - Twenty-one supplemental rock and PK samples were collected for testing (Acid Base Accounting (ABA), Net Acid Generation (NAG), and Supplemental geochemical analysis)

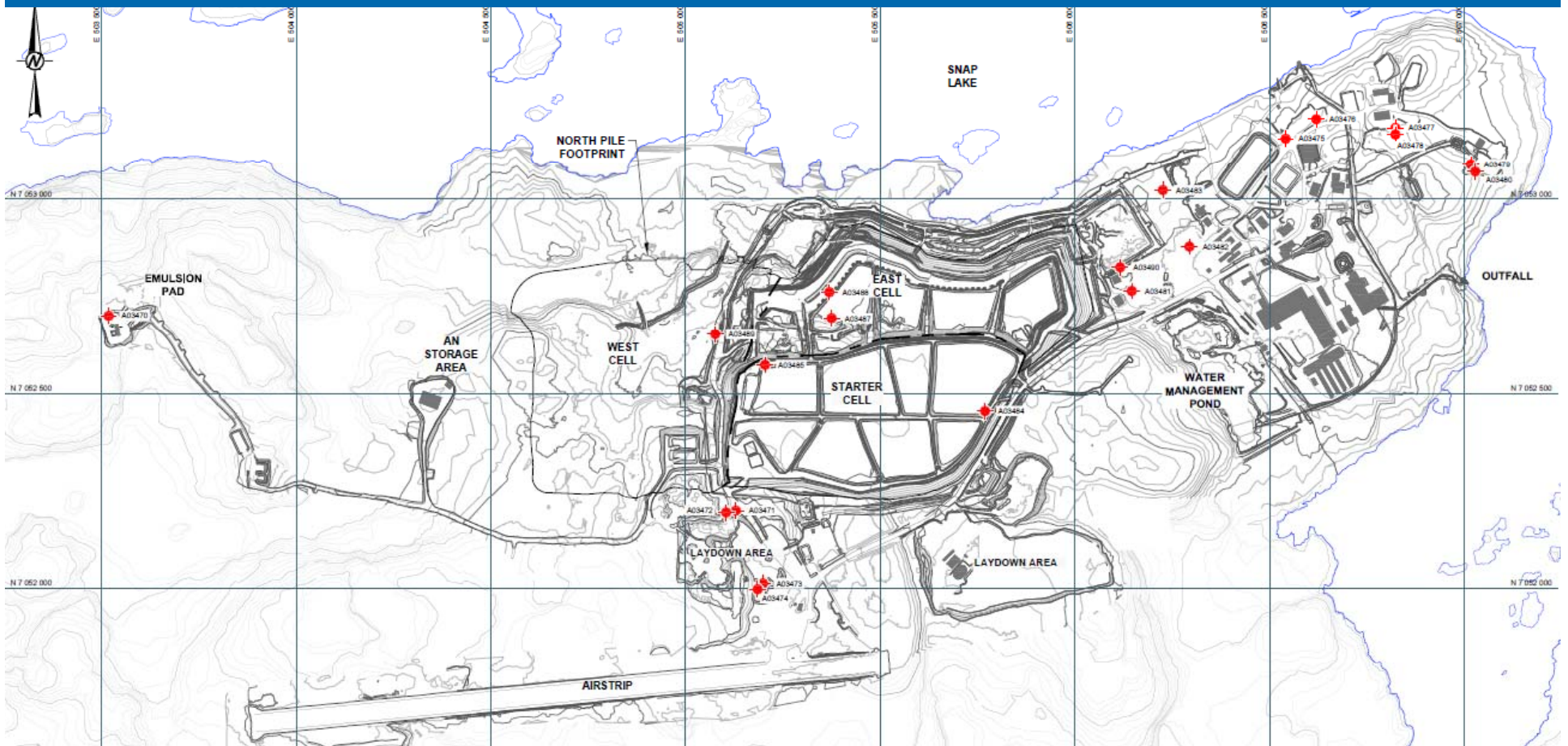


Main Observations from the Geochemical Site Inspection

- No visible signs of incipient acid generation were observed in the roads, rock pads or building foundations at the Mine during the 2014 geochemical inspection. Some minor staining of metavolcanic rock near the FAR was observed however downstream monitoring shows that acidic conditions are not developing at this time
- During 2014, construction occurred in the East Cell of the North Pile. Embankments were constructed with Coarse PK



Geochemistry Sample Locations

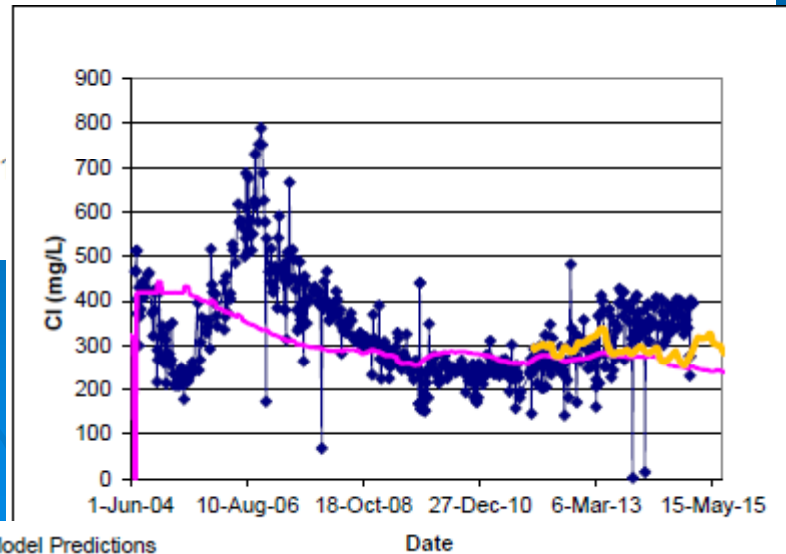
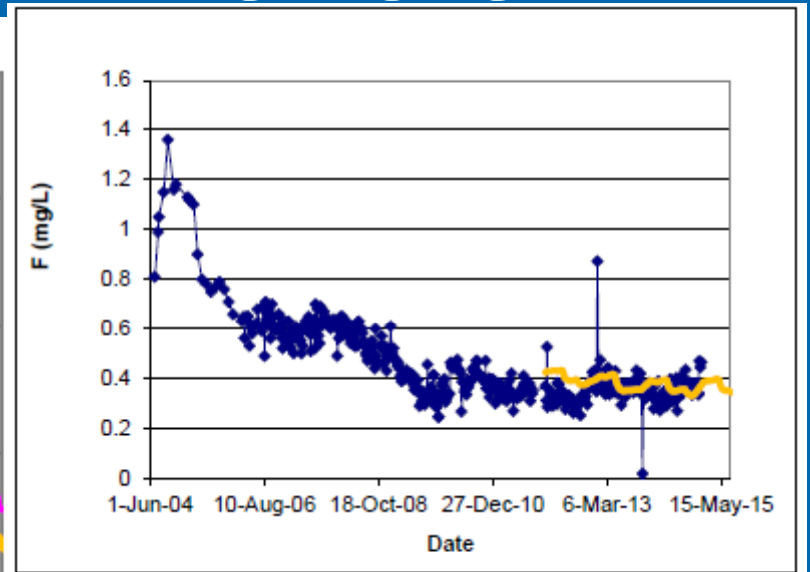
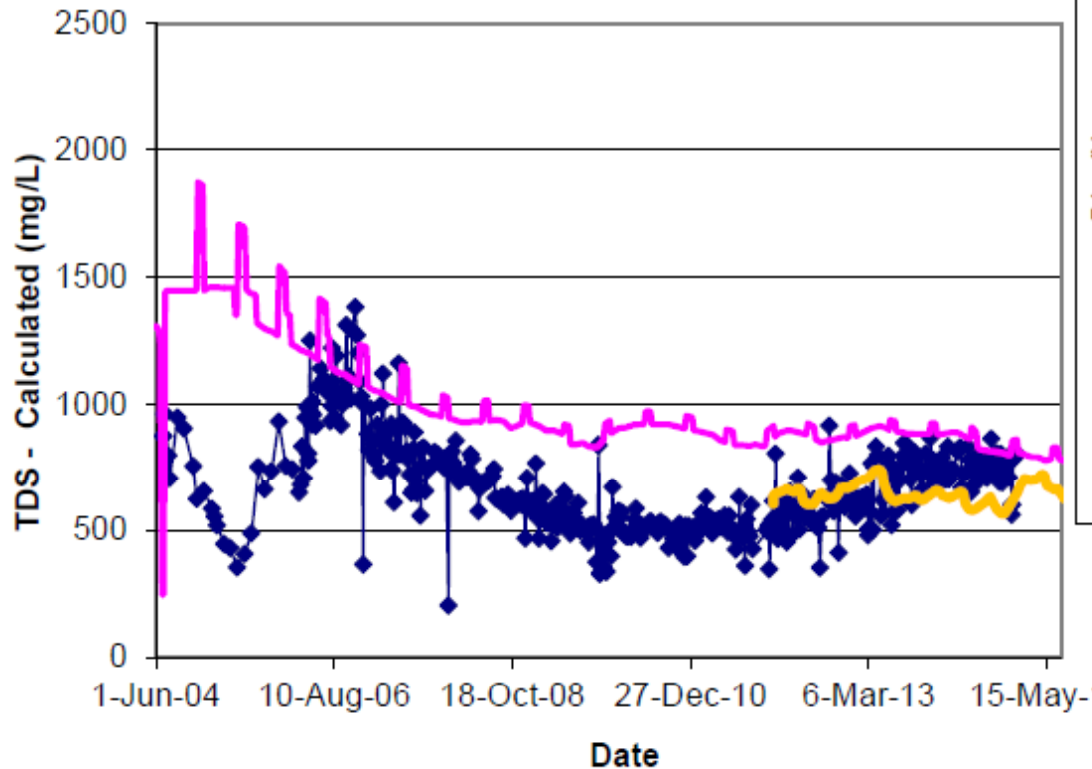


Minewater Quality and Quantity Trends

- Concentrations of TDS and major ions sulphate, calcium, potassium, sodium and chloride and most metals were generally stable during the 2014 monitoring period. Nitrate, nitrite and ammonia concentrations were also generally stable and within a similar range of concentrations measured during the previous monitoring periods
- The measured minewater discharge rates were higher than predictions between January and September of 2014, at which point the discharge stabilized at a rate slightly lower than predicted in the 2013 Base Case Site Water Quality Model predictions



Concentrations of TDS, Fluoride and Chloride in Minewater



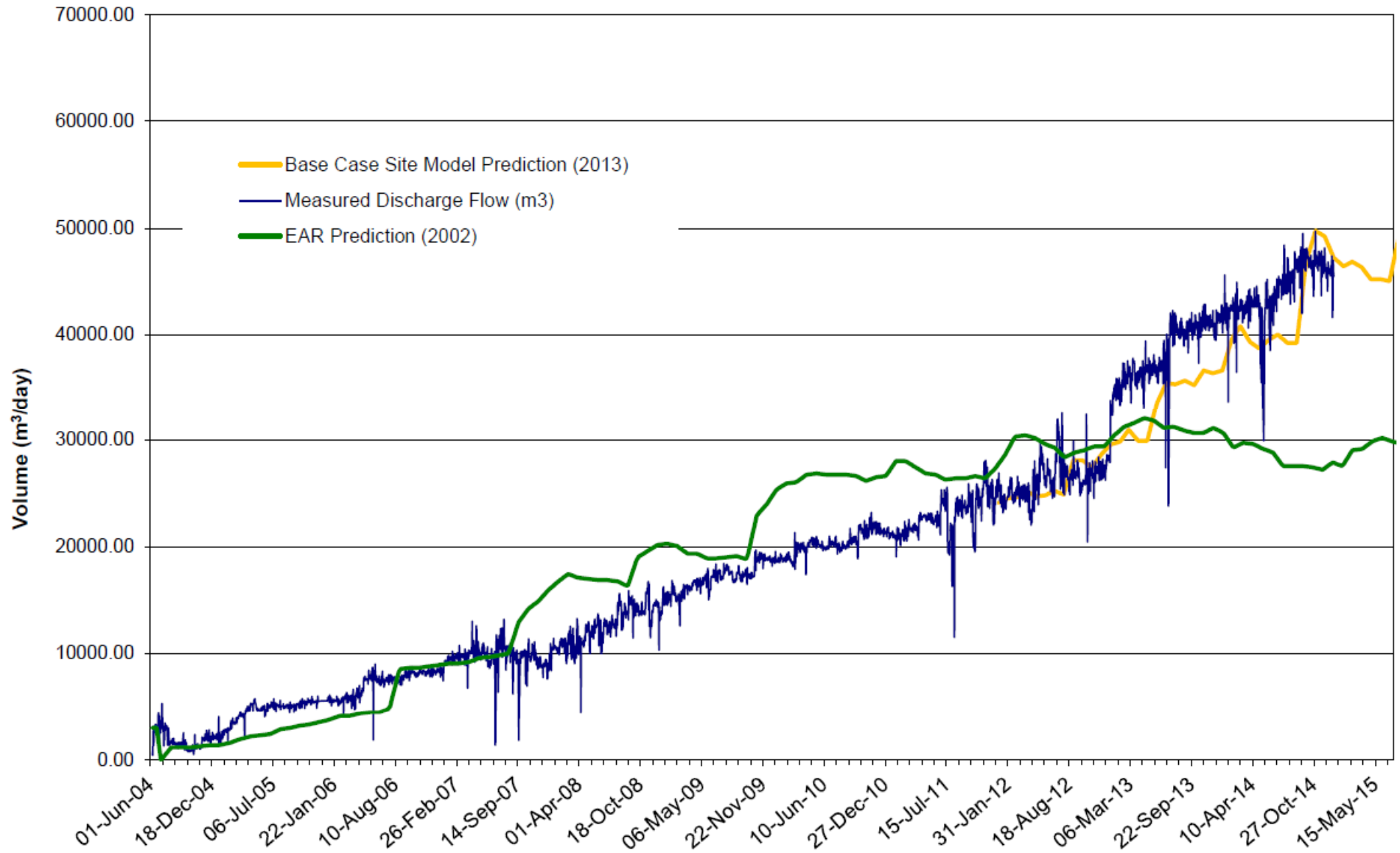
◆ Monitoring Values

— 2002 EA Predictions

— 2013 Base Case Site Model Predictions

Date

Figure 6-2 Minewater Discharge Rate through December 31, 2014



Seepage Monitoring

- TDS concentration at SNP 02-11 (seepage well downstream of WMP, near Snap Lake shoreline), was 826 mg/L, and was consistent with previously reported values
 - The seepage was expected
- Concentration ranges of the main parameters of discussion were similar in all bogs between the East Cell perimeter embankment and Snap Lake
 - TDS concentrations ranged from 3.8 to 167 mg/L
 - Seepage from the North Pile appears to be caused by the diversion ditches and temporary and permanent sumps



Geochemical Characterization of Mine Rock and Processed Kimberlite

- The composition of samples collected in 2014 was within the range of composition of samples in the existing geochemical dataset
- The geochemical assessment of kimberlite, PK and granite has not changed based on the results of the 2014 geochemical assessment
- It is not expected that the metavolcanic materials currently near surface on site will result in acidic conditions developing in the runoff, based on current results and ongoing monitoring data from SNP-02-05 over the past decade
- Based on the current results and existing geochemical dataset, the geochemical criteria for mine rock management are considered appropriate and no changes to these criteria are proposed at this time



Comments from the Environmental Analyst

- No concerns are raised
 - The analysis is satisfactory and report recommendations are supported



7.6 Ceriodaphnia Dubia Low Action Level Triggered – Context, Significance, and Recommendation

- In 2014, the water quality Low Action Level for toxicological impairment was triggered following observed effects on the waterflea *Ceriodaphnia dubia* reproduction, and was confirmed in January 2015
- *C. dubia* toxicity test results from treated effluent and diffuser station samples during 2005 to 2014 were reviewed in detail



Findings

- A lack of consistency between corresponding water chemistry and *C. dubia* toxicity (i.e., toxicity was not consistently associated with elevated contaminant concentrations such as total dissolved solids, nutrients, or metals—there were no correlations), and between results from individual diffuser stations
- A lack of adverse effects on the function of zooplankton communities in Snap Lake, including waterfleas resident in the lake (*C. dubia* is not found in Snap Lake)
- Variability of *C. dubia* toxicity test data and the potential for false positive results (e.g., greater effects observed in the diluted diffuser station samples than in the full strength treated effluent)



Report Conclusion and Recommendation

- The C. dubia laboratory toxicity test results thus do not appear to be directly related either to contaminant concentrations in the treated effluent or to adverse effects on waterfleas, other zooplankton, or other biota in Snap Lake
- An assessment of the current Low Action Level relative to C. dubia test variability, including minimizing the potential for false positives without minimizing early warning of potential effects in the receiving environment, should be considered during the AEMP Design Plan Update in 2015



Comments from the Environmental Analyst

- No comments at this time because the subject is beyond the expertise of the Environmental Analyst



7.7 2014 Hydrology Annual Report

- This report summarizes the 2014 water elevations and lake discharge trends at Snap Lake, North Lake, Northeast Lake, and 1999 Reference Lake. It also provides a summary of the 2014 Snap Lake water balance



Monitoring Results

- Over the period of September 2013 to September 2014, water elevations decreased at the 1999 Reference Lake, North Lake, and Northeast Lake by 56 mm, 78 mm, and 103 mm respectively. Water elevations decreased by 58 mm at Snap Lake
- The Snap Lake water balance predicted a decrease in the water elevation of Snap Lake of 77.4 mm, whereas surveyed elevation changes from September 2013 to August 2014 were 58 mm. These differences may be due to uncertainty in the drainage area inflow data and the Snap Lake outflow data



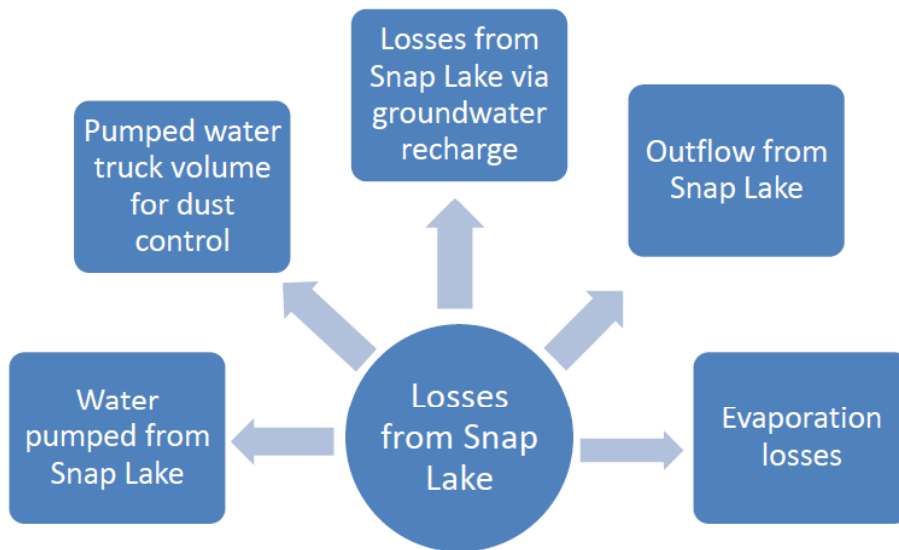


Figure 3: Schematic Displaying Losses from Snap Lake.

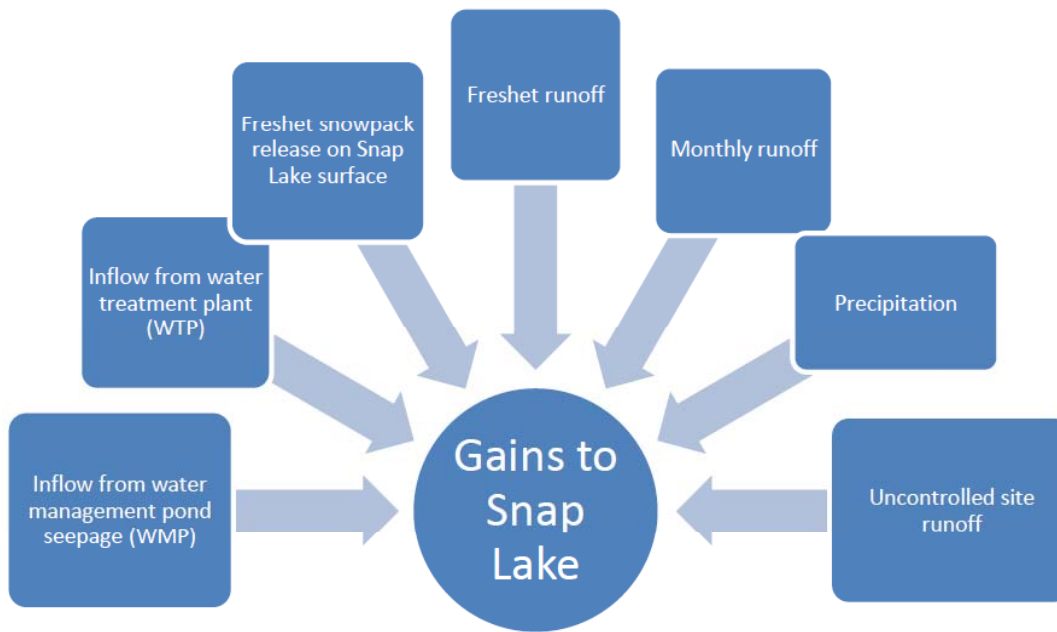


Figure 4: Schematic Displaying Gains from Snap Lake.

Comments from the Environmental Analyst (I)

➤ This report outlines all the water losses and water gains to and from Snap Lake (Figure 3 and Figure 4), in order to aid with water budget calculations, and Figure 5 displays a complete site water balance for Snap Lake Mine

- It is appreciated



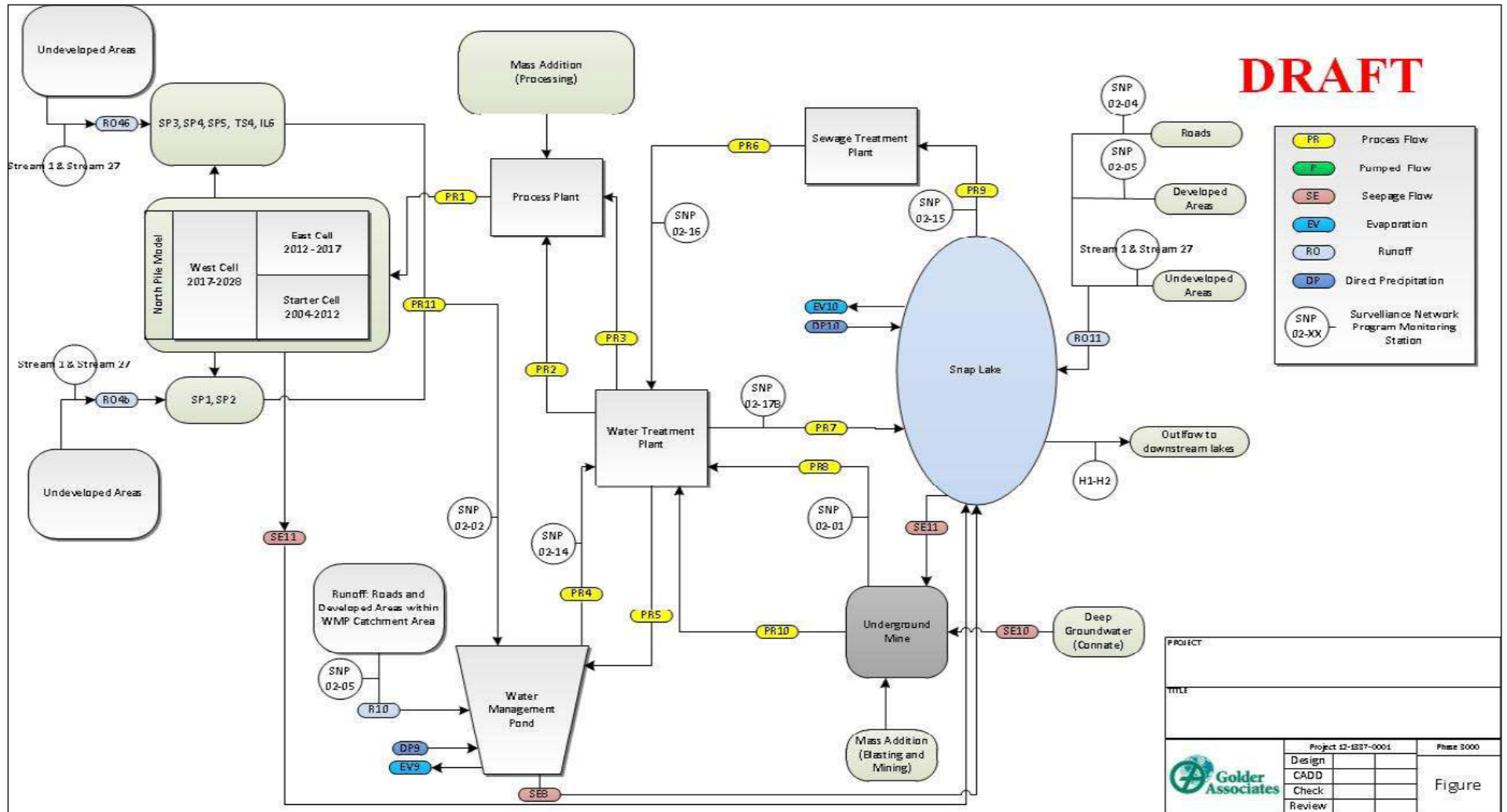


Figure 5: Snap Lake Mine Site Water Balance Flow Diagram. Refer to Appendix II for a list of flow IDs and descriptions.



Comments from the Environmental Analyst (II)

- The inflow from the North Pile seepage is missing Figure 4, whereas it is showed as SE 11 in Figure 5
- Is the Freshet snowpack release on Snap Lake surface part of the precipitation in Figure 4?
- What are the differences among Freshet runoff, monthly runoff and uncontrolled site runoff in Figure 4?
- There are two SE11 in Figure 5. One is the inflow from the North Pile seepage to Snap Lake, another is the losses from Snap Lake via groundwater recharge
 - Correction is requested



8. Water Licence Amendment Application (I)

- De Beers issued their Closing Arguments on the December 2013 Amendment Application on May 1, 2015
- On May 4, 2015, and under subsection 37 of the *Waters Act* and 72.13 of the *Mackenzie Valley Resource Management Act* as delegated under *Schedule A of the Delegation Instrument*, the Minister of Environment and Natural Resources – Government of the Northwest Territories approved the amendment as De Beers applied for on November 12, 2014



8. Water Licence Amendment Application (II)

- The MVLWB's work plan to make a decision on De Beer's December 2013 application to amend water licence MV2011L2-0004 (Snap Lake) expected a Board decision be issued by the end of May
 - "The Board is now expected to issue its decision in the middle of June. This change in decision date continues to comply with all legislated timeline requirements" (May 21, 2015)



8.1 De Beers' Closing Arguments (I)

- “The evidence on which the Application is based has previously been presented and reviewed in a regulatory process. The MVEIRB concluded that the environmental impacts from the proposed changes to the Licence will not be significant, so long as the intent of Measures is achieved”



8.1 De Beers' Closing Arguments (II)

- “As described in detail above, the evidence – including De Beers’ commitments to employ necessary monitoring and mitigation measures – supports De Beers’ view that the Measures will be achieved, should the Application be granted. The evidence also demonstrates that the amendments requested in the Application are necessary for the Snap Lake Mine to remain in operation, and are thus critical to the ongoing provision of benefits and income to government and NWT communities. Therefore, De Beers respectfully requests that the Board grant the Application and issue a revised Licence pursuant to its mandate.”

