



Snap Lake Environmental Monitoring Agency
P.O. Box 95, Yellowknife, NT X1A 2N1
Phone: 867-765-0961
Website: www.slema.ca

September 2, 2016

Kierney Leach
Regulatory Officer
Mackenzie Valley Land and Water Board
7th Floor – 4910 50th Avenue
P. O. Box 2130
Yellowknife, NT X1A 2P6

**Re: De Beers' Request to Defer the Full ICRP Update
Water Licence MV2011L2-0004**

Dear Ms. Leach,

The Snap Lake Environmental Monitoring Agency (SLEMA) would like to thank the Mackenzie Valley Land and Water Board (MVLWB) for the opportunity to provide comments on De Beers' Request to Defer the Full Interim Closure and Reclamation Plan (ICRP) Update.

SLEMA understands that De Beers would like to delay the January 2017 submission of the ICRP update to a date prior to the expiry of its water licence on June 13, 2020. In this event, De Beers would have to submit its application for renewal, including the ICRP update, at least a year before the licence expiry. This scenario would mean the planned January 2017 ICRP update would be deferred for two and a half years.

As De Beers stated, permanently closing the Snap Lake Mine is one of the options being considered; by their own admission, the future of the mine is uncertain.

SLEMA also notes that Part I, Item 3 of Water Licence MV2011L2-0004 states

- *The Licensee shall, submit to the Board, a minimum of twenty-four (24) months prior to the end of operations, for approval, a Final Closure and Reclamation Plan*

Because of the uncertain future of the mine, it is possible that there would not be a Final Closure and Reclamation Plan in place if De Beers decided to close the mine permanently during the Extended Care and Maintenance period. The review of the ICRP is an ongoing process, which allows De Beers to continuously collect input from the impacted communities and other interested parties to refine



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its closure objectives, research plan, progressive closure and post-closure monitoring for the final closure and reclamation activities.

While SLEMA understands the preparation of a detailed and well informed ICRP requires time, we do not support a three-year deferral as requested by De Beers as this would leave stakeholders without any detailed closure and reclamation plan should the company decide to close the mine before any updated ICRP is submitted.

However, recognizing the need for more time, SLEMA recommends the MVLWB grant a maximum of one year extension to the original submission date.

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

Sincerely,

Original signed by

Arnold Enge
Chairperson