

GENERAL INSTRUCTIONS FOR EXCEL TEMPLATE:

1. Do not leave blank rows above or between comments.
2. Do not modify or delete the instructions or the column headings (*i.e.* the grey areas).
3. Each comment must have an associated topic and recommendation.
4. All formatting (*i.e.* bullets) will be lost when this file is uploaded to the Online Comment Table.
5. If necessary, adjust the cell width and height in order to view all text.
6. Cutting and pasting comments from WORD documents cannot include hard returns (spaces between paragraphs).
7. If you would like to create paragraphs within a single cell, please use a proper carriage return (ALT & ENTER).

TOPIC

COMMENT

RECOMMENDATION

Be as specific as you think is appropriate; for example a section or page of the document, a recommendation #, general comment, etc.

Comments should contain all the information needed for the proponent and the Board to understand the rationale for the accompanying recommendation.

Recommendations can be for the proponent or for the Board. Recommendations should be as specific as possible, relating the issues raised in the "comment" column to an action that you believe is necessary.

Cover Letter	No concerns are raised, and it is acceptable that De Beers requests to not file an ICRP in January of 2018 but will instead focus efforts on completion of FCRP and licence application for 2019.	it is recommended that the MVLWB approve De Beers' request.
Extended Care and Maintenance Plan	Monthly site visits by De Beers staff, combined with remote monitoring arrangements (video surveillance, remote sensing, etc.), as well as the capability to mobilize a maintenance crew during the period of non-occupancy, may work for the period of Extended Care and Maintenance.	It is requested that De Beers develop detailed check list for monthly site visits, and report results of site visit and remote monitoring in the SNP Monthly Report for stakeholders' review.
Spill Contingency Plan and Emergency Response Plan	No concerns are raised for Spill Contingency Plan and Emergency Response Plan.	

Waste Management Plan	<p>It is stated in Section 1.3 that due to mechanical issues with filter media in the new sewage treatment plant, housed in the Utility building, De Beers continued to use the old Sewage Treatment Plant (STP) until the Extended Care and Maintenance Plan took effect, necessitating a smaller plant to be built. It is stated in Section 5.1 that the smaller wastewater treatment plant (STP3) has been installed and will be commissioned in 2018. The information is helpful to understand how De Beers deals with sewage issue from the operation period to extended care and maintenance period.</p>	
	<p>However, the information for water treatment is inadequate. In the Revision History (page iii), it is stated that water treatment capacity volume was revised in Section 6, but no revised data is found in Section 6 (page 30 to 33. It is not appropriate to put Potable Water Treatment Plant (Section 6.1) into Waste Management Plan. Modular Water Treatment Plant has been used during Care and Maintenance, but no information is available in Section 6. The water treatment solution described in the Technical Memorandum: De Beers Canada Snap Lake Mine Water Management Strategy dated September 4, 2017 is not mentioned in Section 6, either.</p>	<p>Similarly detailed information on the Modular Water Treatment Plant and the new water treatment train as STP3 is requested.</p>
Water Management Plan	<p>Section 2.1.5 Sewage Treatment should be consistent with Section 5 of Waste Management Plan.</p>	<p>Correction is requested.</p>
	<p>Section 2.1.9 Water Treatment Plant should be consistent with revised Section 6 of Waste Management Plan.</p>	<p>Correction is requested.</p>

Section 3.1.3, Extended Care and Maintenance Plan	It is stated in page 31 (Section 3.1.3, Extended Care and Maintenance Plan) that optimization of returning high-concentration surface water to the underground workings via existing water management infrastructure. What, when and how De Beers will trigger and stop pumping?	
	It is noticed that if the water elevations at the fresh air raise and conveyor portal are above the water elevations of Snap Lake, there will be hydrological pressure to move water from underground to Snap Lake. That will be inappropriate and should be corrected.	The water levels at those locations should follow the management practice of those perimeter sumps, ensuring water levels lower than that in Snap Lake.