

EA 99.804

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Subject:  
Pages: 3, including cover

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Pl. see attached

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September 03, 1999

Louie Azzolini  
Environmental Assessment Officer  
Mackenzie Valley Environmental  
Impact Review Board  
Box 938  
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Your file    Votre référence

Our file    Notre référence

Dear Louie:

This is in response to your request for additional recommendations to be considered for the environmental assessment of the BHP expansion project following the meeting held August 25, 1999.

With regard to the Review Board's supplementary information request of BHP, I understand that this additional information is expected within the near future and when received, it will be provided to all reviewers. To clarify process, my understanding is that the Review Board will use the additional information to develop draft EA guidelines which will be then be reviewed by those who attended the last meeting on this project. When the guidelines are finalized, you will then submit them to BHP so that they can prepare an environmental assessment report which addresses the information requested in the guidelines.

As mentioned at the meeting, our written comments on scope of project and scope of assessment (dated August 23, 1999) reflect the basis of what we feel should be included in EA guidelines. In addition to these we have attached more specific information needs on lands and aquatics-related issues for your consideration.

As noted in correspondence previously, the Environment and Conservation division (through Marie Adams) will be the coordinator for information flow for DIAND related to the environmental process in general. However the Review Board will need to maintain a direct relationship with the DIAND - Lands Resources Division for additional information distribution as they will be a regulatory authority (RA) for this project.

The Board should be aware that DIAND Lands Resources will be a regulator for the purposes of this review, due to the requirement for land tenure for the road and Pigeon/Sable pipes along with the quarry lease. Consequently, Lands will utilize the Boards recommendations in their decisions, and will consider any comments or suggestions for lease conditions into their documentation.

Please contact Marie if you need more information from us at this time. We look forward to receiving the draft EA guidelines.

Sincerely,

  
Mary Tapsell  
Manager

Canada

**Addition to comments dated August 23, 1999**

**Lands -related issues (Lands Resources)**

One area, concerns the change in the mining schedule/operation from the approved consecutive mining approach (one pit at one time) to a concurrent mining method (mining multi-pits at the same time), and how this change in mining method along with the whole expansion project will impact the approved overall mine operation. To some extent, this requirement is listed under points 1 & 2 of Louie Azzolini's e-mail of August 27, 1999. However we should stress the importance of the change in mining method and what it will mean. (IE. greater impact on the environment at any one time, etc).

The information for the Sable road and quarry are sketchy at best. Details on the exact boundaries, management/reclamation specifics of the quarry are missing. Rationale for the road, including rationale for the proposed routing, all weather vs seasonal is needed.

More generally speaking, the role of the road vis a vis future development/mining of other pipes should be looked at. What are BHP's exploration plans for the future and how do they relate to this project (for example, will the road be utilized to access future exploration areas, and is the plan, should a pipe be brought to fruition, to utilize the road)? Or, alternatively, is BHP's plan to have a road in place, for the possibility of mining additional pipes? A map which delineates all the Kimberlite pipes in the claim block and existing/proposed roads would be useful in this determination.

**Aquatics related issues (Water Resources)**

**PROJECT DESCRIPTION AND ADDITIONAL REQUIREMENTS**

The company's description and the MVEIRB's tables appear to be quite complete. However it would be useful to add a brief description of all facilities, plans etc referenced, that will continue to apply or be updated. The locations, eg of the Waste Rock Dumps should be noted, and the capacity to hold the additional waste rock confirmed. The description should be cross referenced to the original detailed source documents, or plan as approved, should the reader want more information.

**EA GUIDELINES BASED ON EXISTING PROJECT DESCRIPTION - Dated February 1999**

In the Reasons for Decision under the Preliminary Screening report, the need for baseline environmental data, ie water quality, fish, sediments etc from the Pigeon pond and Stream was noted. This system is in the Exeter Lake Drainage, rather than Lac de Gras.

There are studies done for DFO on Sable and Beartooth, but additional data could be required. "several impacts and mitigation measures are described in the jointly prepared Preliminary Screening Report may need to be revisited.

As acknowledged by BHP, additional geochemical or acid rock drainage testing is needed especially on the waste rock associated with the two further pipes, Sable and Pigeon. Beartooth is likely the same as Panda or Koala, but confirmation tests may be warranted.

Additional discussion of cumulative effects with Diavik and the expansion project are needed, as little is provided now.

Public concern: as BHP surmised, this was not based on comments received, as the Project Description was not publically circulated. It is an assumption based on the original project review, and comments raised more recently with respect to the Diavik assessment. This needs to be addressed further, through consultation.

BHP will need to confirm that all the existing facilities it plans to use can in fact adequately handle the increased waste materials, loadings etc.