

Environment and Conservation  
P.O. Box 1500  
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November

Mackenzie Valley Environmental Impact Review Board  
Box 983  
Yellowknife, NT, X1A 2N7

**RE: Comments on the draft Terms of Reference - Sable, Beartooth, Pigeon pipes - BHP Ekati Mine development expansion:**

The Department of Indian Affairs and Northern Development (DIAND) has reviewed the draft terms of reference for the above development. We have consulted with several sectors of the department who either have expertise in a specific area or have regulatory or inspection responsibilities for the existing mine development.

We have structured our response to include 'general' comments of an overall nature and have as well included comments for each specific section of the terms of reference as noted. In addition, as an appendix, in order to maintain some clarity, I have attached comments on the Project Description as they have bearing on the overall understanding of the project. Therefore, even though presented as an appendix, it does constitute a sub-section of our comments on the terms of reference and we expect these will be considered by the Review Board in their final draft.

We wish to recommend to the Board that they make the focus of this environmental assessment the environmental/bio-physical aspects of the expansion of the project. It is our contention that the expansion of this project will not have a significant effect on the socio-economic aspects of the development. The socio-economic impacts of this project have already been assessed for this project in an overall sense and these impacts will not change with this expansion.

As we have offered in many instances previously, our office is willing to assist in drafting documents such as the above and indeed in any other aspect of assessment that the Board feels is appropriate. Should you need clarification on any aspect of our comments we will be pleased to meet with the Board or staff to outline our reasoning or explain the regulatory aspects of this development. Please do not hesitate to call me if necessary.

Sincerely,



Marie Adams  
Environmental Specialist  
BHP

**DIAND Comments -****Terms of Reference - Sable, Pigeon and Beartooth pipes - BHP expansion project****GENERAL**

1. This project was referred for an Environmental Assessment (EA) to the Mackenzie Valley Environmental Impact Review Board (the Board) by the NWT Water Board *and* the Dept. of Fisheries and Oceans (corr. Line 6). The referral was with respect to potential cumulative effects of the expansion in relation to other developments and for reasons of public concern. DIAND along with other federal and territorial agencies has recommended to the Board that in addition to investigating potential cumulative effects, the EA should be confined to; a) new activities related to the expansion and b) changes to existing facilities etc, as a result of the expansion.

Section 127 of the MVRMA instructs the Board to take into account "any report made in relation to that proposal....etc". Therefore it is important that the current EA terms of reference clearly focus the scope of its assessment to these aspects. This focus is not apparent in the draft terms of reference which appear to be generic (line 430 being an exception), to the entire mine operations including those components previously assessed.

2. Early in the Introduction there needs to be a few descriptive paragraphs that put the proposed expansion into context with respect to the existing mining operations and the environmental assessment work and public consultations which have already been done. This would afford the public and the Environmental Assessment Report (EAR) reviewers an understanding and an expectation of what the proposed development project is all about. As well it would establish that the MVEIRB had a good understanding of the proposal.
3. It must be recognised by all interested parties that the proposed BHP mine expansion is not unexpected. In fact, the mine life and the results of a shortened or lengthened mine life were discussed in the original Environmental Impact Statement in Volume 1, Section 3.10.1.1 and, the possibility of losing the Leslie pipe was discussed in Volume 1, Section 3.10.3. In addition, it is not unexpected because shortly after receiving government approvals for the main Ekati mine site and associated infrastructure BHP announced its intention to forego the development of the Leslie pipe which as noted above, had been part of the original approved development proposal. At the same time the company announced its intention to seek approval to mine the Sable pit some 20 kilometres to the northwest of the main mine site.
4. With respect to the Leslie pipe, BHP has indicated that they do not expect this pipe to be mined in the foreseeable future and it is not a part of the current project plan. However, from a regulatory perspective, we recognize that by virtue of the approved surface lease in place, the Leslie pipe continues to be a part of BHP's long-term mining plan. It is also recognized, that in the event that this pipe should reach the stage of development at some future date, BHP will need to apply for an amendment to its current water licence at that time to enable its exploitation.
5. The three new pipes, the road to the Sable pipe and an incremental increase to Panda/Koala will result in 512 hectares of new development. It is projected that the incremental increase in the footprint disturbance area (if the Leslie pipe were not to be factored in) and the opening of the three smaller pipes is 168 hectares or about 7%.
6. Important components of this project are the various plans (ARD, waste rock storage, quarry management, A&R plans, etc) included mainly under the current water licence and also under the Environmental agreement which regulate and set specific terms for management of the

project. All of these plans will be undergoing modification and will need to be approved by authorities in the regulatory phase (not the EA phase) of this project. The specifics of these changes to plans will be dependent in part on the nature of recommendations made (and approved) in the EA process. The flexible nature of these plans to accommodate changes to capacity and scope will need to be considered by the Board in their recommendations. The Board needs to recognise the dynamic nature of these agreements and plans and their capacity to respond to changes as evaluated by the expert departments. The regulatory phase of this project therefore should not be confused with the EA phase.

7.

It is recommended that the scope of assessment be focussed on the environmental and bio-physical aspects of this development. The GNWT has indicated in previous discussions with the Board, that they are unlikely to re-open the Socio-economic agreement as the current effects of postponing mining of the Leslie pipe will be offset in part by the three new pipes. It is our contention that the expansion of this project will not have a significant effect on the socio-economic aspects of the development. The socio-economic impacts of this project have already been assessed for this project in an overall sense and these impacts will not change with this expansion.

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With respect to references to underground mining. If this is with regard to re-investigation of alternative mining methods we do not agree this should be included. The methods in use on this project were assessed by the BHP panel process and the proponent should not be faced with re-justifying mining methods with every expansion unless there are obvious advances in technology and mining methods from what has been previously assessed.

## **SPECIFIC COMMENTS BY SECTION**

### **1.2 Public Consultation**

There is considerable overlap in the points noted. These could be combined to ask who provided comments, the nature of these, and how these key comments effected any changes in design of the project (if any).

-line 45, add KIA after Metis organizations

-DIAND Lands has already granted approval to mine Leslie through the Koala mining lease.

Consultation guidelines should be established to establish that these new pipes are in addition to, and not a substitution for, Leslie.

### **1.3 Traditional knowledge**

-line 70 after 'knowledge' add 'relative to the scope of the project'

-line 72 after 'developer' add, 'in a timely manner'

-line 72 need to define or give BHP guidance on what is meant by 'appropriate diligence'

## **2 Scope of Development**

What is the purpose of the boxed instructions in the middle of these ToRs? Are reviewers to understand that the deadline is only for the Scope of development and not for the balance of the document? Recommend eliminating unnecessary 'side bar' instructions and place these in the front end of the ToRs.

### **Section 2.1 Mining**

Also note comments included in Section 1 of this document - **General comments.**

The scope should focus on a) new activities related to the expansion, and b) changes to existing facilities etc as a result of the expansion. It is hoped the MVEIRB will stick to this course, and not open up already assessed areas of the project which will not be affected by this expansion. Considering the review process, it is assumed that BHP has been advised of what additional baseline data might be needed, for instance, background water quality and hydrology information for the drainage area to be affected by Sable and Pigeon pit development in the Exeter basin. BHP should be collecting and analysing this data by now.

It is recommended that the focus of the EA be cumulative impacts, and not be an extensive reiteration of already known information, (previous EIS and subsequent plans and studies). Conclusions reached by the original BHP FEARO panel should be upheld regarding existing development, unless new information has come to light to change things.

### **2.1 Mining**

- There is no indication of underground development at Pigeon or Sable pits, yet it is indicated here.
- It is not clear what is meant by a specific reference to 'ramps'. We understand ramps to be a component of open pit mining as required under I (line 91).
- what is meant by 'below ground mining support infrastructure?' If this is meant to be a component of open pit mining then it is captured under section (I). If in relation to underground development, there is no information in the Project description that refers to this.

### **2.2 Mined Rock**

- Suggest that title should be "Mined Rock Associated with 2.1, Mining"
- In the project description dated October, 1999, the proponent states that the ore from the three proposed pipes are similar in nature to the Panda kimberlite and are within the parameters established for design of the Processed Kimberlite Containment Area. They also state that they are doing additional testing to confirm this. Also, it appears no new tailings impoundment areas will be created nor will these three pits receive tailings.
- The tailings pond was assessed previously for a lifetime of 20 years with a further assessment on the remaining 5 years of the original plan where waste rock was to be placed in pits. What is new here is that (if Leslie still remains a viable pipe), there will be an extra 3 years of tailings disposal. It is recommended that the EA focus on this 3 year aspect of tailings generation and verify the tailings to be placed in the containment area are within the parameters established for the design of this facility.
- will also need to provide information on the waste rock stockpiles which would grow with the opening of Beartooth and Pigeon. Likewise, the lake bottom sediment storage area would increase in size. Information should be provided on these storage areas.

### **2.3 Water Management**

- if it is the case that existing facilities (part iv and v) are not changing, these should not be assessed again.

### **2.4 Transport**

Change 'the processing plant' to 'the existing haul road.'

### **2.5 Existing Ekati Diamond Mine**

Line 117 after 'changes' add 'if any'.

### **2.6 Related Considerations**

Suggest that section 2.6.1 will be better placed at the beginning of 'Scope of Development' as it provides a good introduction to the proposed development.

#### **2.6.1 Development Sequence**

The MVRMA definition of 'development' includes only those developments that "is carried out" (it does not state will be carried out). As such on existing developments should be included in cumulative effects assessment of this project.

In terms of exploration, it is felt that cumulative effects assessment (CEA) is limited to including past exploration (if there are residual effects) and existing exploration activities by BHP and any other company who falls within their regional assessment boundary. "Anticipated exploration activities" and "future exploration plans" (as discussed in this section) fall outside the definition of existing development and are therefore outside the scope of a CEAs under MVRMA.. This being the case, we are not certain why the Board is asking for the information in s.2.6.1. They did not ask for similar material for Ranger et al.

#### **section 2.6.2**

The existing Operating Environmental Management Plan has all this information of all the hazardous materials in use at the mine. There is no information that any new hazardous materials will be used in the expansion. If no new material, there is only a need to identify how much and where the materials will be stored in these new areas.

#### **Section 2.6.3**

-Define the scope to be those accidents and malfunctions related to the proposed development and related infrastructure and any additional or new impacts of the expansion on existing facilities and infrastructure.

-this section should also include the potential for explosions related to fuel or hazardous materials.

-part I - previously assessed. An extensive spill plan has been developed and is in use.

-there are no new 'tailings' (processed kimberlite containment area) planned so this should be explained (see comment under section 2.2 Mined rock)

- As for all 'dikes' this should be specific to the Bearclaw Lake and Sable pipe sedimentation pond dikes.

-part V. Unless the characteristics of the kimberlite is different than what has been previously assessed, "*the tailings (processed Kimberlite) containment areas*" should not be assessed again except for potential increase due to the expansion. The "*waste rock (country rock)*" should be assessed as there are new areas and changes to original designed existing ones. "*Ore stockpiles*" There is no information indicating that there are going to be new ore stockpiles created with this project so this should not be reassessed or it should be explained. "*Overburden stockpiles*", yes agree that this area should be included a new area at Sable will be created and the existing area at Ekati™ will be expanded. "*Open pits*", yes agree for the new open pits. "*Sewage facilities*", In DIAND's opinion, this does not need to be included as there are no new facilities being created nor any changes to existing facilities.

Part VI. "*Failures during the milling process*", this does not need to be reassessed again as it was in the prior EIS

Part VII. "*General emergency situations*", this was thoroughly assessed in the previous EIS

#### **Section 2.6.4**

-Suggest combining 2.6.4 and 2.6.5 and use lines 162-165 as part of the introductory work in line 150.

-Also specify that this is only in relation to the proposed development as the main mine site has already been assessed and approved.

-focus should be on Part VII 'Reclamation of open pits' where the proponent has proposed to restore pits to viable fish habitat which is a change in the pit reclamation assessment done in the previous EIS .

### **Section 3 - Environmental Assessment**

#### **Section 3.0: Environmental Assessment**

Since these requirements are quite detailed, it might be worth adding into the 3.0 preamble that the

developer should keep referring back to the scope, or keep Section 5.1, Conformity, in mind when compiling the report. This might save the proponent from spending unnecessary time and resources on data analysis previously completed. In many instances, it should take a look at existing approved plans, and assess the impacts or problems associated with expanding the use of facilities like the tailings containment area, or modifying the plans and facilities to reflect the additional requirements.

There is a significant amount of information in the original EIS which pertains to most of subjects listed in this section. Again, most of these subjects were thoroughly assessed previously and do not need to be included or assessed again.

The subjects which do need to be addressed are subsections II, III, IV, V and VI as they relate to the new project areas.

### **Section 3.1.1 Alternatives**

-if there is no change in proposed alternatives to such aspects as 'backfilling depleted pits and alternative technologies for tailings management' these should not be re-assessed. However alternatives to design of key elements of the new developments where new or expanded impacts are a potential, should be included.

### **Section 3.1.2 Description of Existing Environment**

Much of this has already been described in the previous EIS. While some repetition is useful to provide context to the current EA, readers can be referred to the original EIS for details. Parts II - VI should be addressed as they relate to the new project areas.

-line 209. Define 'hyper-linked for the technically challenged amongst us.

-line 211 add 'as they relate to the proposed development'

-lines 218-223 delete as they have already been assessed and approved by government

-line 224 - agree for the Sable pit area as some cultural resources would not have been assessed previously.

### **Section 3.1.6 Impact Description /predicted outcomes after mitigation**

-'Magnitude or Significance'? Should use consistent terms

**\*\*There is no Section 3.1.7 - is this a misnumbering or is it missing\*\*\*\***

### **Section 3.1.8.1 Land use**

Most of these items have previously been assessed so do not repeat. The validity of Parts II and VIII are questioned.

### **Section 3.2 Environmental impacts**

For clarity sections should match order of topics under 3.2.1

#### **Section 3.2.1 Air Quality and Climate**

A significant amount of information was detailed and assessed in the previous EIS. Except for potential cumulative affects of air quality, there is no need to assess again except for the new developments with regard to cumulative effects assessment.

-Define 'chemical species'

#### **Section 3.2.2: Terrain:**

Much of this is water related as well, and could be cross referenced where possible to Section 3.2.4. A quick scan of the list of considerations seems to show a number of overlapping or duplicated topics. It is recommended that the list be condensed and checked against what was previously assessed.

-Agree with Parts I, VIII. Parts II - VII , IX - XVI, XVIII - XXVI were previously assessed only if there are expected to be changes due to the new developments.  
- language should be checked for clarity. 'Thermal milieu' 'thermal impact' what is the difference and what do they mean. 'Seismicity' isn't this in relation to potential for earthquakes? This has been assessed in the previous EIS

### **Section 3.2.3 Vegetation and Plant communities**

Previously assessed - for most of the project. Needs assessment for of any new impacts of the new pipes/roads.

### **Section 3.2.4: Water Quality and Quantity:**

This section should include a requirement to address the issue of known/hidden ice lenses, and to locate potential locations, and provide an assessment of possible outcomes (ie: slumping), and effects on both the facilities and environment if the ground is disturbed, and/or the active permafrost layer be impacted. This concern may be covered by the provisions in Section 3.2.2, but it isn't clear.

-Part 1 - already assessed in previous EIS  
- Agree with Parts II - XII especially for Pigeon and Sable.

### **Section 3.2.4.1 Water chemistry of spoil (is this a term the public will understand)?**

-Part III already assessed in EIS should only be assessed for new developments if any changes expected.

### **Section 3.2.4.2: Water Balance:**

-The requirements need to be clarified as to whether a revised water balance for the complete site is expected, or if they can build new components into the existing water balance.

-It is noted that there may be additional water from Beartooth and Pigeon pits so, water balance may be required for the Sable pit sedimentation pond and the Long Lake tailings containment area.

-'water retention dykes'. Since existing dykes were previously assessed only new dykes (eg. dykes in two rock lake associated with Sable) should be assessed.

-do not agree with 'underground workings' (not being carried out in the expansion) and 'the mill' unless there is going to be changes in capacity which BHP has indicated will not happen in the foreseeable future with the Leslie pipe being taken off the mine plan in this project description (although it remains as a long term viable pipe).

- with regard to the mill, the amount of ore being milled per day will not change from what has been assessed previously. The total amount of ore processed with the 3 new pipes and Leslie, will increase. So the point here is the potential increase in tailings capacity not mill capacity.

### **Section 3.2.4.3 General Water**

-Insert 'development' before 'impacts' (line 396)

### **Section 3.2.5 Aquatic Organisms and Habitats**

-The previous EIS assessed much of these including those in Parts I, II, and V.

-Part III. The impact on Two Rock, Sable and Beartooth lakes fisheries resource is known as they will be fished out.

### **Section 3.2.6 Wildlife and Wildlife Habitat**

BHP should provide an analysis of effects on wildlife and wildlife habitat. The list is repetitive.

(Vi, Viii, ix, and xvi are very similar). xvi should be removed since it is unnecessarily detailed (as wildlife includes birds).

### **Section 3.3 Social, Economic and Cultural components**

Line 456. For the most part should be deleted and readers should be referred to the previous EIS or BHP should be directed to draw heavily on the work that has already been done.

### **Section 3.3.8 Government**

This section regarding the impacts to Government for monetary issues should also identify other fee structures/costs such as quarry royalties (est. @ \$300K) or changes to security deposits and A&R costs based upon the increased development and/or 5 pits being mined concurrently.

### **Section 3.4.1: Cumulative Impacts:**

As mentioned, more of the information and analysis required for this EA should focus on cumulative assessment rather than individual discussion of topics. CEA was one of the initial reasons this project was referred to the MVEIRB and firmer guidelines for its assessment could result in a blueprint for future development in the region.

The first two paragraphs need to be tightened up to ensure that the message is consistent with respect to what developments must be included in a CEA. More specifically, the first paragraph uses "existing developments" while the second paragraph uses "developments that are being carried out". Based on this language, it is not clear if the Diavik Diamonds Project is to be included or excluded from the CEA. It is recommended that the second paragraph be removed and that the first paragraph be amended to:

The EAR shall include an assessment of cumulative effects likely to result from the development in combination with other existing developments and developments within the regulatory process on the day these terms of reference are issued. For additional clarity, the existing BHP project and the Diavik Diamonds Project must be included in the assessment of cumulative effects at a minimum."

Also recommend that this section include a requirement that the regional spatial and temporal boundaries used in the CEA be described and a rationale provided as to why the selected boundaries are meaningful for the ecosystem component being assessed. In addition, it is recommended that the Board include a line to the effect of: "In addition, to providing a rationale supporting spatial and temporal boundaries used in the assessment of cumulative effects, the proponent must also describe developments considered, but not included in the in-depth analysis of cumulative effects and a rationale for this decision."

Existing exploration impacts should be assessed however these are limited in nature of effects and therefore should not need an in-depth analysis. See also sec. On Mining where this is discussed.

### **Section 3.4.2 Abandonment & Restoration**

This section should include scoping on the management plan for the pipe. For example, figure 4.7.1 of the Project Description only shows the timing until completion of mining for a particular pipe. It should also detail scheduling (duration, timing) for pipe development, closure work, reclamation and monitoring. The reclamation and monitoring facets will have periods of active (requires actual working on site) and passive (waiting for nature to take its course) activity and these periods should also be noted along with what the expected outcome of each phase will be. Post monitoring time requirements, criteria and rationale are important and should be noted.

### **Section 3.4.4 Compensation**

The question must be asked as to why BHP shall provide information for policies that they already have. This review is for what will happen as on line 588.

### **Section 4.1 Executive Summary**

List the languages noted as 'appropriate' so that BHP is not left guessing.

### **Section 4.3 Tenure**

- Both surface and sub-surface should be included
- does this section include the quarry area along the Ursula Esker?



#### **Section 4.4 Developer's policies**

-Part III delete 'impending' as PAS was enacted Sept. 27, 1999.

-line 610 BHP should be informed as to why the information is needed and should only be asked for information on policies that may change as a result of the mine extension

#### **Section 4.5 Performance Record**

It appears that there is a great deal of duplication between this section 4.5 **Performance Record** and section 4.2 **Developer Information**. In section 4.2 BHP is asked to provide "... developer information including names of company representatives managing the proposed development . Include company incorporation and structure." In section 4.5 **Performance record** BHP is asked to provide "... proposed development ownership, organizational structure identifying organizational responsibilities for mine development and operations...". This appears to be seeking the same information twice.

#### **Section 4.6 Regulatory Regime**

It may also be useful along with the chart to plot this information on a map, to illustrate the different Management regimes. For example, changes to the approved plans on the Koala mining lease, security deposits would likely be through the operating plans or Environmental Agreement. From a lands perspective, unless lease boundaries are being changed, no changes to these documents would be required for this project.

-line 634 after 'mining operation' add, 'as they pertain to the new extension'

#### **Section 4.6: Regulatory Regime:**

This section should also include, for reference, any existing permits and other authorizations that are still in force and do not require amendment. Dates of validity would be useful to include.

#### **Section 6: Definitions:**

-The "Closure" definition needs to be corrected, as the reference to pipelines and associated facilities would not apply for this project. Remove 'pipeline' and substitute 'pits.'

-Update the following terms to a generic format (delete references to pipeline facilities).

8. abandonment
9. closure
10. post-closure

Closure occurs when the operation ceases and all decommissioning and reclamation work is completed. The property then goes into a monitoring (post-closure) phase for verification of reclamation work. The next phase is the abandonment of the property (relinquishment of land (all) tenure documents for site, and the Lessee is released from all responsibilities for the site and the security deposit is returned.

## **APPENDIX 1 - Comments on the BHP project Description. "Proposed development of Sable, Pigeon and Beartooth pipes"**

These comments are provided in order that issues presented may be addressed where appropriate, in the EAR or in the final terms of reference as guidelines to the proponent.

Leslie Pipe - The Leslie Pipe has been approved, regardless of whether it is mined or not. Even though it is indicated the three new pipes replace Leslie, unless BHP choses to "officially" withdraw this pipe (release that portion of the Koala Lease or covert the Leslie Pipe to part of the Tailings lease), it has to be considered that they will mine it. Figures, such as 1-2 and 1-3 should show the Leslie Pipe as it is "permitted". Until a distinction is made, our review would not be based upon a reduction in the mine plan (25 years subtract 10 years for Leslie plus 3 years for new pipes to give a revised mine life of 18 years) but an addition to the mine plan (25 years plus 3 years for new pipes for a total of 28 years). This difference, while subtle, would likely have an effect on the scoping of this review, and comments received.

It is however recognized that should Leslie reach the stage of development, BHP will need to re-apply for an amendment to its current water licence to enable mining of this pipe.

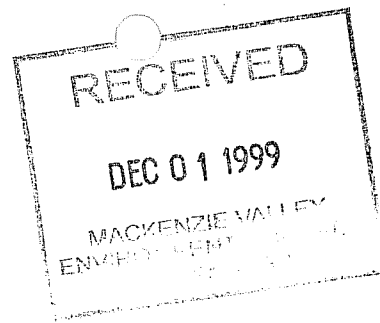
For example, page 1-7 states that Leslie will be retained in BHP's resource base, yet on page 4-30 the chart does not list the Leslie pipe, even though they could mine (DIAND approval for the lease has already been granted for Leslie). This is of concern, as this project description is based upon a reduction in overall mining. This is illustrated on page 4-31, last sentence 2<sup>nd</sup> para. which states that there is more capacity in the PKC than is needed for this expansion (20+ years?), yet based upon Leslie still being approved to mine, the mine life would be 28 years; would the PKC have the capacity to handle the increased kimberlite?

11. The revised mining plan is to mine 5 open pits simultaneously for years 2006 and 2007, where in the original mine plan only 3 pits would be open at once. (security deposit implications)
12. Page 2.9 lists seven leases, when in fact there are only six leases making up the mine.
13. Page 3-1, check reference section of the MVRMA, as Sec. 127 does not deal with the pre-consultation process. What is probably meant instead is that the previous EIS established consultation guidelines which were used as a guide to the scope of pre-consultation in specific communities.
14. Section 3.1 on page 3-2 describes the consultation process, wherein the public has been advised that Leslie has been dropped. This may have lead people to believe that Leslie will never be mined, and that the three new pipes replace Leslie. This could have altered people's comments/opinions of the expansion and it should be rectified in the EAR.
15. A portion of the road going to the Sable pipe has changed alignment since the original application and our tour this fall. The proposed realignment is in the vicinity of the Ursula Esker.
16. Page 4-1 states a number of the operating plans for the mine will be updated to include all aspects of the proposed new development. Discussion with regulatory authorities, including GNWT needs to take place in order to be positioned to properly respond for this amendment process.
17. Page 4-30 states the operational plan for the processed kimberlite Containment Area will not

change due to the new pipe development. This is based upon Leslie not being mined, however, we must still conclude that it will be mined, so changes may be required.

18. Section 4.6.1.1 should include an actual figure for the increase in winter road traffic, resulting from the 3 new pipes. How does this compare with actual figures for each year to date.
19. Page 4-38, Sec. 4.6.3 would be better illustrated if the size of the areas required for the ore storage pad, permanent camp, etc, were given versus the actually area of the Sable road from the Pigeon pipe turnoff. Does larger area necessarily denote more impact?
20. Page 4-39 deals with the Ursula Esker. No quarry application has been received to date by DIAND. The EA should address the potential impacts of the final quarry site with respect to the necessary amendments which will be made to quarry management plans (under the water licence) as part of the regulatory phase.
21. Page 4-39. In addition to completing geotechnical work on a proposed quarry site, archeological evaluation needs to be carried out on the quarry and all road alignments.

# Fax



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**Date:** *Nov. 30/99*  
**Subject:** *DIAND comments - BHP TOR.*  
**Pages:** *12, including cover*

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*Please see attached  
Comments*

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