



Independent Environmental Monitoring Agency

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March 30, 2012

Brett Wheeler
Regulatory Specialist
Wek'eezhii Land and Water Board
#1-4905 48th Street
Yellowknife NT
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Dear Brett

**Re: W2009L2-0001 - BHP - Waste Rock and Ore Storage Management Plan -
Version 3.0**

The Independent Environmental Monitoring Agency has reviewed the Waste Rock and Ore Storage Management Plan (WROMP) Version 3.0. In this covering letter the Wek'eezhii Land and Water Board (WLWB) will find some general comments regarding the WROMP and a specific comment that did not warrant a place in the accompanying comment table.

General Comments

Overall, the WROMP V.3 is a good report that comprehensively describes the existing conditions (with an excellent summary of rock geochemical behavior) and the various measures that BHPB is implementing with respect to managing its waste rock deposition at the site.

The addition of a figure (Fig.5.1) depicting general drainage flow paths from the various waste rock piles is helpful.

Specific Comments

- High quality graphics illustrating final closure conditions of the waste rock dumps have been incorporated from the ICRP (Interim Closure and Reclamation Plan) and are an added bonus of this WROMP. Post-closure wildlife access ramps to the dump surfaces from the surrounding landscape are illustrated. It is not clear how these were designed, or by whom, but review of the design features (placement, width, surface materials, density, etc.) of these ramps is likely an excellent example of where Traditional Knowledge could be applied and the WROMP should cross-reference appropriate sections in the ICRP.

We thank you for the opportunity to submit comments and we would be happy to discuss them with you and others at your convenience.

Sincerely

A handwritten signature in black ink, appearing to read "W.A. Ross". The signature is written in a cursive, flowing style.

Bill Ross
Chairperson

cc. Society Members
Bruce Hanna, Fisheries and Oceans
Lisa Lowman, Environment Canada
Jason Brennan, AANDC Inspector