

## INDEPENDENT ENVIRONMENTAL MONITORING AGENCY

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December 15, 2006

Violet Camsell-Blondin Chairperson Wek'eezhi Land and Water Board Box 32 Wekweti NT X0E 1W0

Dear Ms. Blondin-Camsell

## Re: Regulation of Road Watering Activities at the Ekati Mine

As requested in your letter dated November 27, 2006, the Agency is pleased to offer the following comments on the regulation of road watering activities at the Ekati Mine.

The Agency is generally supportive of efforts to coordinate regulatory requirements and reporting, and agrees with the concept of consolidating the regulation of road watering activities at Ekati. Accordingly, we support the move by the Board to consolidate road watering requirements.

We note that there are some specific measures spelled out in the current Class B licences such as daily (MV2002L2-002) and annual (both licences) limits for water withdrawals, annual reporting requirements for water used and unauthorized discharges, and updating of contingency and closure plans. We also note that the use of chemical dust suppressants on the Misery Road requires approval of the Board under the Class B licence covering this activity.

We note that the Class A water licences would require submission of a plan ahead of time for dewatering related to road work, and that there are general requirements for the reporting of water use. There does not appear to be an explicit requirement for updating contingency and closure plans, or for Board approval of dust suppressants under the Class A licences for activities related to road watering. We are of the view that it would be desirable that these requirements be retained as part of the dewatering plans under the Class A licences for road watering.



We would be happy to answer any questions your staff may have of our views on this issue.

Sincerely,

Bill Ross

Chairperson

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cc. Society Members
Sarah Baines, Wek'eezhi Land and Water Board
Scott Stewart, DIAND Water Inspector