



16 Yellowknife Airport
Yellowknife, NT. X1A 3T2

File: Water Licence #MV2001L2-0002/LUP #MV2010D0053

January 23rd, 2012

Permitting and Environmental Superintendent,
Snap Lake Diamond Mine,
De Beers Canada Inc.,
300, 5102 – 50th Ave.
Yellowknife, NT. X1A 1R6

Attention: Alex Hood

Mackenzie Valley Land
& Water Board

File MV2001L2-0002

JAN 30 2011

Application # MV2010D0053

Copied To MCL Reg

RE: Request to store Oil Totes at the Land Farm area.

Ms. Hood,

Thank you for your letter of January 17th, 2012 requesting permission to store approximately 109 Lube totes at the land farm until September, 2012. The Land Farm does meet conditions for lube storage detailed in the June, 2010 Hazardous Waste Management Plan, section 5.3. This Plan commits De Beers to "locate Petroleum, Oil, and Lubricants within a perimeter berm lined with HDPE geo-membrane and store these materials in compliance with best management practices".

LUP condition 26(1)(m), Clause 69, grants the Inspector authority to authorize fuel storage outside of Fuel Storage Facilities (which must in turn be approved under the appropriate Environment Canada legislation). Unfortunately, I cannot in good conscience grant storage of lubes in the Landfarm. The intent of the Land Farm facility as described in the Environmental Assessment/Consolidated Project Description is clearly to facilitate a program rehabilitating fuel contaminated material on site (or to conduct research to assess the feasibility of land farming contaminated soils on site). In essence, the Land farm facility is designed to be used to reclaim contaminated material, and not to store lubes. Lube storage in turn is clearly intended to occur at the Lined area of the Waste Management Area or in lined/bermed areas of Laydown 1. The inspector encourages DeBeers to enlarge the lined area at the WMA and/or Laydown 1 to meet the needs of future lube storage.

Not to be lost is the fact that at least one of the cells in the Land Farm has had contaminated material placed into it. Placement of lubricant cubes within this cell would seem to preclude the efficient farming of that material (which, as I understand it, optimally needs to be spread out in a thin layer, turned, and left in situ for some period of time). The inspector encourages DeBeers to take advantage of the opportunities the existing Landfarm provides to initiate reclamation of this material in the summer of 2012.

If you have any questions or concerns with this request, please don't hesitate to contact me.

Sincerely,

A handwritten signature in cursive script that reads "Tracy Covey". The signature is written in black ink and is positioned above the printed name.

Tracy Covey
Resource Management Officer III, AANDC

cc: Maxwell Morapeli (DeBeers Canada Inc.)
Scott Stewart (AANDC)
Marc Casus (MVLWB)