

Reviewer Comments and Proponent Responses

Project: De Beers - Gahcho Kue
Board: Mackenzie Valley Land and Water Board
Proponent: De Beers Canada Inc. - Gahcho Kue

File Number: MV2005L2-0015
Review Comments Due: October 15, 2024
Proponent Responses Due: October 22, 2024

No.	Topic	Reviewer Comment	Reviewer Recommendation	Proponent Response	Board Decision
Fisheries and Oceans Canada (DFO) - Ms. Natalie Grishaber					
1	De Beers - Gahcho Kue Spill Contingency Plan V4	DFO reviewed the document in accordance with our mandate and has no comments at this time.	DFO has no comments or recommendations at this time.	Acknowledged.	Noted.
GNWT-ECC - Environmental Regulatory Analyst					
1	GNWT-ECC Cover Letter	<p>The Department of Environment and Climate Change, Government of the Northwest Territories has reviewed the application at reference based on its mandated responsibilities under the Waters Act and has provided comments and recommendations for consideration of the Mackenzie Valley Land and Water Board.</p> <p>For any technical questions, please contact Ariel Greenblat, Water Management Advisor at Ariel_Greenblat@gov.nt.ca with the Regulatory and Permitting Division.</p> <p>Should you have any questions or concerns, please do not hesitate to contact gnwt_ea@gov.nt.ca.</p>	N/A	N/A	Noted.

No.	Topic	Reviewer Comment	Reviewer Recommendation	Proponent Response	Board Decision
2	Section 5.2.1.1 Potential Spill	In section 5.2.1.1 it states there "eight (4) 500,000 L prefabricated diesel tanks".	Government of Northwest Territories Environment and Climate Change (GNWT-ECC) recommends clarifying whether there are eight, or four, diesel tanks.	Section 5.2.1.1 includes a typo and should state that there are four (4) 500,000 L prefabricated diesel tanks. This will be corrected in the next iteration of the Emergency Response and Spill Contingency Plan.	Version 3.1 of the Plan was approved by the Board on March 3, 2017. The Board directs De Beers to correct the editorial error noted in section 5.2.1.1 and resubmit an updated version with the corrected information.
Environment and Climate Change Canada (ECCC) - Mrs. Stepynie Mallon					
1	ECCC Cover Letter	ECCC Cover Letter	N/A	N/A	Noted.
2	Topic: Acetylene Vapour Behaviour References: - Appendix D: Acetylene, Gahcho Kue Mine, Emergency Response and Spill Contingency Plan, Version 4, September 2024	In Table D4.2: Acetylene, and in Section D4.2.1.1: Warnings, the statements "[vapour] will sink to ground levels" and "vapours form instantaneously, and are heavier than air" are made in reference to acetylene. ECCC would like to note that acetylene has a relative vapor density of 0.91, according to the PubChem database (https://pubchem.ncbi.nlm.nih.gov/compound/6326#section=Solubility), meaning it is lighter than air and would generally rise, rather than stay close to the ground.	ECCC recommends that the Proponent amend Appendix D to accurately reflect the fate and behavior of acetylene.	De Beers appreciates the identification of this discrepancy in Appendix D. Section D4.2 relating to acetylene will be to accurately reflect that it is lighter than air based on vapour density. This section will be updated in the next iteration of the Emergency Response and Spill Contingency Plan.	Version 3.1 of the Plan was approved by the Board on March 3, 2017. The Board directs De Beers to correct the discrepancy noted in Appendix D and resubmit an updated version with the corrected information.

Environmental Protection Operations Directorate
Prairie & Northern Region
5019 52nd Street, 4th Floor
P.O. Box 2310
Yellowknife, NT X1A 2P7

ECCC File: 5100 000 013/007
MVLWB File: MV2005L2-0015



October 15, 2024

via online review system

Angela Love
Regulatory Specialist
Mackenzie Valley Land and Water Board
7th Floor, 4922 48th Street
P.O. Box 2130
Yellowknife, NT X1A 2P6

Dear Angela Love:

RE: MV2005L2-0015 – De Beers Canada Inc. – Gahcho Kue Mine – Emergency Response and Spill Contingency Plan, Version 4

Environment and Climate Change Canada (ECCC) has reviewed the information submitted to the Mackenzie Valley Land and Water Board (MVLWB) regarding the above mentioned Emergency Response and Spill Contingency Plan.

ECCC provides expert information and knowledge to project assessments on subjects within the department's mandate, including climate change, air quality, water quality, biodiversity, environmental preparedness and emergencies. This work includes reviewing proponent characterization of environmental effects and proposed mitigation measures. We provide advice to decision-makers regarding a proponent's characterization of environmental effects, the efficacy of their proposed mitigation activities, and may suggest additional mitigation measures. Any comments received from ECCC in this context does not relieve the proponent of its obligations to respect all applicable federal legislation.

If you need more information, please contact Stephinie Mallon at Stephinie.Mallon@ec.gc.ca.

Sincerely,

Stephinie Mallon
Acting Senior Environmental Assessment Officer

cc: Eva Walker, Head, Environmental Assessment North (NT and NU)
Leslie Yasul, Acting Manager, Environmental Assessment, Prairies and Northern Region





October 15th, 2024

Angela Love
Regulatory Specialist
Mackenzie Valley Land and Water Board
P.O. Box 2130, 4922 - 48th Street
Yellowknife, NT. X1A 2P6

Dear Angela Love,

RE: De Beers - Gahcho Kue Spill Contingency Plan V4

The Department of Environment and Climate Change, Government of the Northwest Territories has reviewed the application at reference based on its mandated responsibilities under the *Waters Act* and has provided comments and recommendations for consideration of the Mackenzie Valley Land and Water Board.

For any technical questions, please contact Ariel Greenblat, Water Management Advisor at Ariel.Greenblat@gov.nt.ca with the Regulatory and Permitting Division.

Should you have any questions or concerns, please do not hesitate to contact gnwt_ea@gov.nt.ca.

Sincerely,

Shakita Jensen
Environmental Regulatory Analyst
Environment Impact Assessment
Department of Environment and Climate Change