

January 8, 2025

Mason Mantla
Chair
Wek'èezhii Land and Water Board
#1, 4905 – 48th Street
Yellowknife, NT
X1A 3S3

Dear Mr. Mantla:

RE: W2022L2-0001 – WROMP – Seepage Response Framework V1.0 RFD - Request to Defer Version 1.1 Submission

On August 28, 2024, the Wek'èezhii Land and Water Board (Board) issued the Reasons for Decision (RFD)¹ for the Ekati – WROMP - Seepage Response Framework (SRF) V1.0. Decision #1 of the RFD outlines the submission date and requirements for Version 1.1 of the Seepage Response Framework, as follows:

***Decision #1:** The Board does not approve WRSA Seepage Response Framework Version 1.0 and directs Arctic to submit Version 1.1 of the Framework within 135 days of communication of this decision. Version 1.1 is to include Revisions A to G.*

As per this decision, the submission date for SRF Version 1.1 is set for January 10, 2025. Since the Board's decision, Burgundy Diamond Mines Ltd. (Burgundy) has been actively working to address the required revisions and incorporate feedback from the public review. These include clarifying the application of EQCs, providing additional details on Terrestrial Benchmarks for the Action Levels, identifying potential Response Actions, clarifying seepage flow paths, and addressing other necessary revisions.

However, given the ongoing efforts and the complexity of the required revisions, it has become clear that the 135-days timeline will not be sufficient to fully meet the requirements outlined in the RFDs and the Water Licence. Specifically, further exploration of active seepage flow paths is necessary during the Freshet and Fall surveys in 2025. Also, engagement with stakeholders regarding the framework is planned during the annual site visit in Summer 2025, as part of the continued efforts to address feedback received during the review of Version 1.0.

For this reason, Burgundy is writing to request a deferral of the submission of Seepage Response Framework Version 1.1 to December 2025. This extension will allow more time to provide the necessary clarifications in response to the key themes from the public review and ensure all requirements are

¹ [Ekati - WROMP - Seepage Response Framework V 1.0 - Reasons for Decision - Aug 28 24.pdf](#)



fully addressed. In the meantime, Burgundy will continue to manage and monitor seepage in accordance with the approved WROMP and Water Licence requirements until the SRF is finalized and approved.

We appreciate your understanding and consideration of this request. If you have any questions or concerns related to this request, please contact William Liu at (403)-200-1193 or william.liu@burgundydiamonds.com

Sincerely,

William Liu, P. Eng

Manager, Environmental Reporting & Permitting