

Page:	Section:	Draft EA Report Text:	NRCan Comment:
65	6.2.2	<p>Natural Resources Canada noted concerns that, as groundwater flows through bedrock slowly, residual project effects on groundwater quantity and quality may not be observable at groundwater monitoring wells during operation. Natural Resources Canada recommended that the Proponent be required to monitor groundwater seepage intercepted by the seepage collection systems throughout operation to assist in the timely identification of residual effects to groundwater and to inform whether contingency measures are required. To validate and transiently calibrate the groundwater model for the Gordon site, Natural Resources Canada also recommended that the Proponent use the results of ongoing monitoring, including long term pumping tests, to support the design of the interceptor well system. To validate and transiently calibrate the groundwater model for the MacLellan site, the quantity of groundwater inflow to the open pit should be monitored and monitoring data used to update the groundwater model if differences between the monitoring data and the conceptual model are observed. Natural Resources Canada noted concerns that the interceptor wells may not be able to collect sufficient groundwater volumes to offset lake level drawdown in Gordon and Farley Lakes after the first two years of operation or during the summer months. As such, supplementary mitigation measures</p>	<p>Natural Resources Canada noted concerns that, as groundwater flows through bedrock slowly, residual project effects on groundwater quantity and quality may not be observable at groundwater monitoring wells during operation. Natural Resources Canada recommended that the Proponent be required to monitor groundwater seepage intercepted by the seepage collection systems throughout operation to assist in the timely identification of residual effects to groundwater and to inform whether contingency measures are required. To validate and transiently calibrate the groundwater model for the Gordon site, Natural Resources Canada also recommended that the Proponent use the results of ongoing monitoring, including long term pumping tests, to support the design of the interceptor well system. To validate and transiently calibrate the groundwater model for the MacLellan site, the quantity of groundwater inflow to the open pit should be monitored and monitoring data used to update the groundwater model if differences between the monitoring data and the conceptual model are observed. Natural Resources Canada noted <u>that, through the information request process, it was stated by the Proponent that <del>concerns</del> that the interceptor wells may not be able to collect sufficient groundwater volumes to offset lake level drawdown in Gordon and Farley Lakes after the first two years of operation, and that no pumping can occur of during the summer months. As such, water from the open pit will be required to supplement the water pumped from the interceptor well system throughout the operations</u></p>

		may be required to offset project-related lake level drawdown in Gordon and Farley Lakes.	<u>period. It is also noted that well deepening or additional</u> supplementary mitigation measures may be required to offset project-related lake level drawdown in Gordon and Farley Lakes.
68	6.2.3	<p>Groundwater interceptor wells will be installed at the Gordon site to intercept groundwater flowing towards the open pit prior to discharge at the pit wall, and intercepted water will be returned to Gordon Lake and Farley Lake to offset potential effects to lake levels due to groundwater drawdown. Intercepted water will be treated to meet the Metal and Diamond Mining Effluent Regulations and the pollution prevention provisions of the Fisheries Act prior to discharge.</p> <p>If monitoring indicates that operation of the interceptor well system is not effectively mitigating project-related changes to lake levels in Gordon Lake and Farley Lake, additional mitigation measures, such as installation of a grout curtain or cut-off wall, will be implemented. The Proponent will submit these measures to the Agency prior to implementing them.</p>	<p>Groundwater interceptor wells will be installed at the Gordon site to intercept groundwater flowing towards the open pit prior to discharge at the pit wall, and intercepted water will be returned to Gordon Lake and Farley Lake to offset potential effects to lake levels due to groundwater drawdown. <u>Water from the open pit will also be used to offset potential effects to lake levels.</u> Intercepted water, <u>and pit water</u> will be treated to meet the <i>Metal and Diamond Mining Effluent Regulations</i> and the pollution prevention provisions of the <i>Fisheries Act</i> prior to discharge.</p> <p>If monitoring indicates that operation of the interceptor well system, <u>in combination with pumping from the open pit</u> is not effectively mitigating project-related changes to lake levels in Gordon Lake and Farley Lake, additional mitigation measures, such as <u>deepening the system,</u> installation of a grout curtain, or cut-off wall, will be implemented. The Proponent will submit these measures to the Agency prior to implementing them.</p>