
HAMMOND REEF GOLD PROJECT RESPONSE TO COMMENTS ON FINAL EIS/EA

COMMENT – T-10

Source: Canadian Environmental Assessment Agency

Summary of Comment

The Ontario Ministry of the Environment notes discrepancies in the scoring of alternatives related to hydrogeology.

The impact to groundwater is scored on the number of ponds estimated to be needed for seepage collection, and there is no consideration that soil type and overburden depth have been considered, even though these factors have significant impact on the ability to monitor and/or control seepage and/or implement mitigative measures and contingencies.

The proponent has not adequately addressed the initial concern in GW-05 regarding the impact of soil conditions on the assessment of alternative sites, and may not have properly assessed the alternatives for TMF location with respects to the potential for groundwater impacts.

Unrelated to the above, in Section 3.5.4.2.2 which is based on the distance of the facility to Marmion Basin, TMF 1 and TMF 3 are not scored equally although they are virtually the same location, and therefore both lie within the same distance of the Marmion Reservoir. An explanation is required for the differences in score.

Proposed Action

Re-evaluate the alternatives assessment for the tailings management facility with respect to soil type and conditions in relation to groundwater impacts, and overburden depth, to confirm selection of the preferred alternative. Consideration should be given to Lizard Lake in the assessment.

Provide an explanation on the difference in scores with TMF1 and TMF3 even though both facilities lie within the same distance of the Marmion Reservoir.

Reference to EIS

4.2, Alternatives Assessment TSD, Section 3.5.1.3.2

Appendix 4.1, section 3.5.1.3.3, 3.4.2.2.2, 3.5.2.2.2, 3.5.4.2.2

Response

At the TMA-3 (base case) location, there has been some characterization of the detailed hydrogeological information necessary to evaluate the suggested metrics (hydraulic conductivity, depth to the bedrock, groundwater depth, etc.). This type of information is not available for the other alternative locations. Therefore, an evaluation and comparison of the hydrogeological conditions could not be fully completed using the suggested metrics.

Canadian Malartic Corporation has committed to installing seepage collection systems for the mine waste disposal areas and these systems will be designed, based on site specific conditions, to collect and capture seepage. The general foundation conditions for the alternatives have been considered and deemed feasible for construction of a TMF and effective seepage collection system. With these collection systems in place, the relative potential for groundwater release to the environment is related mainly to the complexity of the collection

HAMMOND REEF GOLD PROJECT RESPONSE TO COMMENTS ON FINAL EIS/EA

system. In the evaluation of this indicator, it is considered that the complexity of the collection system increases with the number of required collection ponds. Therefore, the relative potential for groundwater release to the environment is evaluated based on the number of collection ponds required by the collection system.

With respect to the distance from Marmion Reservoir indicator (under the visual impacts sub-account), the evaluation also considered Lizard Lake because it is also used for recreational purposes. It is acknowledged that the indicator should have been identified as 'Distance from Recreational Water Bodies'. In the assessment completed, the preferred alternative (TMF-3) was assigned a lower score because it is closer to either Marmion reservoir or Lizard Lake compared to TMF-1. If Lizard Lake is removed from the evaluation, TMF-1 and TMF-3 would receive the same score. This would result in a higher overall score for the TMF-3 (the preferred alternative) and the final result would remain the same.