

To : Project Assessment and Approvals Branch;
c/o the Department of Environment

I have read the Draft Guidelines for the environmental impact assessment of a proposal by Geodex Minerals Ltd., for the construction and operation of an open pit mine and related facilities and infrastructure in the Napadogan area at:

<http://www.gnb.ca/0009/0377/0002/index-e.asp>

My comments are as follows:

Despite my having drawn attention to alternatives to wet storage of mine tailings, both to Geodex Minerals Ltd. , and NBDENV staffers - and-- presenting similar information to a November 12, 2008 public meeting at Stanley, NB, attended by both Geodex Minerals Ltd. , and NBDENV staffers, the DRAFT GUIDELINES persist in the exclusive reference to "A large tailings impoundment (approximately 250 ha)" on page 1 under 1.1 Background, as the method of tailings disposal with absolutely no reference to the possible alternative of dry stack tailings disposal that I have been suggesting to avoid:

1. the problem of possible tailings containment impoundment dam failure
2. the problem of metal laden water that will have to be spilled over the tailings containment impoundment dam into the Nashwaak watershed

The DRAFT GUIDELINES on page 8 under 2.5 Mitigation, Contingency and Compensation refers to "mitigative measures" that "must be addressed" for "Water quantity and quality", "Wetlands" and "Fish and fish habitat", while the entire thrust of the possible alternative of dry stack tailings disposal on upland forested areas is to avoid impacting "Wetlands" (the most ecologically valuable features on the landscape) entirely.

The DRAFT GUIDELINES on page 11 under 3.1 Project Description - Scope of the Project states that:

"The project to be assessed and its description in the EIA report must include:" ---- " the construction methodology and design description for thetailings pond". This provision precludes tailings disposal other than in a "tailings pond", even though on page 12 under 3.3 Identification and Analysis of Alternatives ... (b) we read that "The analysis must include alternative means of constructionFor example, alternate means of tailings management must be discussed. NOTE: this is after the company has been told to include " the construction methodology and design description for the....tailings pond".

I believe that these instructions to the company regarding the necessary material about the "tailings pond" which implies that there will be a "tailings pond" and the necessity to include "alternative means of constructionFor example, alternate means of tailings management" simply sets the stage for Geodex Minerals Ltd to dismiss the option for dry stack tailings disposal, a methodology about which both Geodex and NBDENV appear to have little knowledge and even less real interest.

I have read and circulated widely the excellent report done by Access Consulting in 2003 entitled:

'Examination of Revegetation Methodologies for Dry Stack Tailings in Northern Environments' at:

www.geology.gov.yk.ca/pdf/MPERG_2003_2.pdf

I conclude that the option/alternative of dry storage of tailing 'CAKE' on upland areas as far away from all watercourse channels, and covered with saved overburden/topsoil --- and revegetating the 'pile' is a technique worth considering.

I also contacted the Access Consulting Group (www.accessconsulting.ca) in Whitehorse, Yukon, which had written the report entitled:

'Examination of Revegetation Methodologies for Dry Stack Tailings in Northern Environments' at:

www.geology.gov.yk.ca/pdf/MPERG_2003_2.pdf

and I had a lengthy telephone conversation with an Environmental Manager at Access Consulting Group

named T. Scott Keesey - -phone (867) 668-6463 , who assured me that the option/alternative of dry storage of tailing 'CAKE' on upland forested areas was well worth considering in regions that have warmer and wetter climates than those where he has been working. Mr. Keesey assured me that IF there was interest in the option/alternative of dry storage of tailing 'CAKE' on upland forested areas he and the Access Consulting Group would be willing to either advise on the specific opportunities for the Sisson Brook project or refer interested parties to other companies familiar with the methodology whose offices are closer to New Brunswick

To counter suggestions that dry tailings storage is so new, and applicable only in very cold-dry environments, that the technique should be dismissed without consideration in New Brunswick, I offer news of its use near Juneau Alaska, in a temperate rainforest ecosystem with a climate that is about as warm as Sisson brook but with much greater rainfall.

Go to <http://www.juneau.lib.ak.us/cdd/Kensington/index.htm>

-- then scroll down to Solid Waste at:

<http://www.juneau.lib.ak.us/cdd/Kensington/solidwst.htm>

Sincerely

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