



Environment and Sustainable
Resource Development

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February 13, 2013

Mr. Glen Semenchuk, Executive Director
Cumulative Environmental Management Association
Suite 214, 9914 Morrison Street
Fort McMurray, AB T9H 4A4

Dear Mr. Semenchuk:

Thank you for providing the Government of Alberta with the Cumulative Environmental Management Association's End Pit Lakes Guidance Document, 2012. I understand this document represents the results of several years of planning and development by the association's Reclamation Working Group.

In general, end pit lakes are accepted by the open pit mining sector across the world as a response to closure planning issues related primarily to mine planning, economic considerations, and material balance at the end of mine life. In fact, the coal mining sector has constructed several end pit lakes in Alberta and the government has issued reclamation certificates in specific cases.

Each mining sector presents particular issues in relation to end pit lakes, and the government recognizes that successful reclamation of an oil sands mine end pit lake has yet to be demonstrated at a commercial scale. When we approve mine applications and closure plans, we accept, in principal, that end pit lakes can be successfully reclaimed. Over time, we expect mine operators will demonstrate this. Ultimately, we will assess successful reclamation against specific regulatory objectives.

The liability for end pit lakes remains with the oil sands mine approval holder until the Government of Alberta certifies the reclaimed landscape according to all applicable legislation and approvals. In order to manage this liability, oil sands mine operators need to continue to work collaboratively through the Cumulative Environmental Management Association as well as other government and industry agencies. This will ensure we are applying appropriate and current knowledge with respect to oil sands mine end pit lake planning, design, construction, and reclamation.

The Cumulative Environmental Management Association's End Pit Lake Guidance Document is one such instance of collaboration. Although many aspects of oil sands mine end pit lake development remain contentious, many stakeholders, including regulators, have accepted the document as technically authoritative. As such, the government would anticipate oil sands mine operators demonstrate their consideration of the guidance document in their mine reclamation and closure planning.

We recognise that the guidance document does not represent the definitive guide to end pit lake design and construction, and that the guidance provided by the document may not apply in all situations. Where the document varies with practical design and construction experience, these instances must be shared through Cumulative Environmental Management Association and documented in future iterations of the guidance document.

The Government of Alberta has raised concerns about the characterisation of provincial and federal regulatory and legislative considerations relating to reclamation and tailings management, particularly in Chapter 2 of the document. We reserve the right to address these and any other concerns within the document prior to publishing the document as a Government of Alberta document.

I appreciate the significance of this document as a guide to the state of science and engineering design for oil sands end pit lakes, and sincerely thank the Cumulative Environmental Management Association for its considerable effort.

Sincerely,



Dana Woodworth
Deputy Minister