

**From:** Martell Peter HVC [mailto:Peter.Martell@teck.com]  
**Sent:** Monday, March 14, 2011 3:14 PM  
**To:** Living Water Smart ENV:EX  
**Cc:** Ben Chalmers; Freberg Mark HVC  
**Subject:** Water Act Modernization - comments in support of MABC

Dear WAM Innovation and Planning Team,

Please consider the concerns raised in the attached letter as you continue with your process of modernizing the Water Act.

Best Regards,  
Peter Martell

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March 8, 2011

Water Act Modernization  
Innovation and Planning Team  
Ministry of Environment  
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Victoria, BC V8W 9M2  
[livingwatersmart@gov.bc.ca](mailto:livingwatersmart@gov.bc.ca)

**Via Email: [livingwatersmart@gov.bc.ca](mailto:livingwatersmart@gov.bc.ca)**

Dear WAM Innovation and Planning Team,

Highland Valley Copper is pleased to have the opportunity to comment on the Ministry of Environment's Policy Proposal (the proposal) for the *Water Sustainability Act (WSA)*.

Highland Valley Copper believes that BC's supply of clean fresh water is a tremendous resource that will provide benefits to society for years to come and should be protected and maintained for the benefit of future generations. We also believe that reliable access to water is a benefit that British Columbians can use to help build a strong economy and reinforce the resurgence of BC's mining industry.

The Mining Association of BC (MABC) recently submitted a response to the proposal and Teck Highland Valley Copper would like to take this opportunity to put our support behind the opinions expressed within the MABC submission.

As stated by MABC, the proposal does not contain a sufficient level of detail to allow our company to understand and anticipate the potential implications that would come from implementing the policy directions contained in the proposal. We encourage the BC government to hold additional consultation sessions as the next level of detail is developed and prior to proceeding to the legislative drafting stage.

Highland Valley Copper relies heavily on ground water sources for use in our Mill process, we recycle approximately 80% of our reclaim water, 70% of our fresh water input is ground water. Highland Valley aquifer levels have been drawn down to achieve open pit wall stability, the water is used for process. Our mining permit and water permit authorize us to dewater and use the water for process.

- **The costing structure of the ground water licensing could have a significant impact on our operational costs.**
- **Restriction of ground and surface water use will impede our ability to operate efficiently.**
- **We believe the WSA should not regulate water sources that are currently regulated under the Mines Act.**

I am designing a framework for a Sustainable Water Management System that will require additional ground and surface water monitoring, however if we were required to log or transmit flows and levels on all of our wells and surface flows this would be a significant capital investment.

- **Additional monitoring requirements will incur significant capital and operational costs.**

The WSA may have a significant impact on future business decisions.

- **We need certainty that we will have enough water to operate our plant efficiently.**

Highland Valley Copper is eager to work with the Ministry of Environment on the modernization of the Water Act, ensuring the long term sustainability of our water resource while maintaining definite access to that resource to help build our economic future.

Thank you for the opportunity to comment on this important issue.

Sincerely,

Peter Martell