

June 25, 2010

Nunavut Water Board
P.O. Box 119
Gjoa Haven, NU
X0B 1J0

Attn: Phyllis Beaulieu, Manager of Licencing

Comments on draft of NWB Supplemental Information Guidelines (“SIGs”)

Dear Ms. Beaulieu;

Thank you for the opportunity to review the draft SIGs and provide comments to the Nunavut Water Board (the “Board”). We commend the significant effort that has been made by the Board and its staff in the development of these detailed materials. HBML anticipates the final SIGs will be very helpful to industry in clarifying information requirements and developing application packages that will meet the requirements of the Board’s duties under the *Nunavut Waters and Nunavut Surface Rights Tribunal Act*, as well as of other regulators with project responsibility.

There is one key area that we would like for you to consider as part of the next phase of work on the SIGs. HBML is concerned that the requirement that proponents submit issued for construction (“IFC”) drawings before the issuance of Board approval will not be practical, both from a timing and resource perspective, in the context of project development in the North. As well, such a requirement may reduce the benefit of the collaboration between proponents and agencies that is a feature of the water licensing process, as agencies would be commenting on “final” designs.

HBML is mindful of the need for the Board to have a thorough understanding of the features of proposed facilities and for this reason, HBML supports a requirement that proponents submit sufficiently detailed preliminary design drawings for Board consideration and approval. HBML also understands the Board’s requirement for certainty that proponents will follow through and build facilities as approved. In our view it is appropriate for the Board to require the submission of IFC drawings in advance of construction, and for proponents to file as built drawings with the Board in a timely manner following construction.

HBML would like to arrange a meeting in Gjoa Haven between Board staff and Maritz Rykaart of SRK Consulting (Canada) Inc. to provide an opportunity to discuss further the practical and professional difficulties associated with early preparation of IFC drawings and to assist in developing alternative strategies that will meet the Board's requirements. Please let us know when this would be convenient.

In addition to the above comments, it would be helpful if the Board also offered Word versions of the SIGs. It may also be useful for proponents to have a sense of the internal Board timelines for determining the completeness of application packages.

If there are any questions or clarification needed on any of the provided comments or on the meeting request, please contact me, Chris Hanks at chris.hanks@newmont.com, and again, we express our thanks for the opportunity to contribute to this initiative.

Sincerely,

Chris Hanks
Director, Environmental & Social Responsibility
Hope Bay Mining Ltd.