



September 5th, 2014

Phyllis Beaulieu Manager of Licensing Nunavut Water Board PO Box 119 Gjoa Haven, NU X0B 1J0

Email: licensing@nunavutwaterboard.org

Dear Ms. Beaulieu,

Re: CanZinco's Response to Pre-Hearing Conference Decision List of Commitments

I am writing to you regarding CanZinco's response to the List of Commitments identified in Appendix C of the Nunavut Water Board's (NWB) *Pre-Hearing Conference Decision* for the renewal and amendment of Licence 1AR-NAN0914 for reclamation activities at the former Nanisivik Mine. The majority of the items identified in the list are identified as being the responsibility of CanZinco. CanZinco's response to those items is summarized as follows:

- Commitment 1: <u>Updated Abandonment and Restoration Plan</u>
 As noted in CanZinco's August 29th, 2014, correspondence to the NWB, a short delay in the submission of the updated Abandonment and Restoration Plan (A&R Plan) will be incurred due to additional time required to process and analyze the last suite of soil samples taken from the hydrocarbon-contaminated soil at Nanisivik. CanZinco anticipates being able to submit an updated A&R Plan by September 15th, 2014.
- Commitment 2: <u>Landfill Design</u>, <u>Operation and Conceptual Closure Plan</u>
 The plan is attached to this correspondence. In summary, the landfill is intended to contain non-hazardous wastes which may be generated during ongoing remediation and monitoring activities, including:
 - Metal reinforcement bars;
 - o Non-reusable sheet metal and scrap steel; and
 - o Geomembrane liners.

The total quantity of non-hazardous waste to be placed in the landfill is expected to be around 50 m³. The preferred location for the landfill is the former outdoor warehouse yard, located three kilometers south of the dock area. The waste will be covered by soil and a geomembrane liner to isolate it from contact with wildlife. The landfill will be shaped to prevent ponding of water and to conform to existing topography. As the materials are non-hazardous and permafrost aggradation into the landfill is not necessary, a 60 cm thick soil cover is proposed. The performance of the landfill installations will be monitored as part of the annual geotechnical inspection conducted at the mine site.

Commitment 3: Confirmation of Requirements for additional Land Use Permits for proposed Landfill
 The proposed landfill is located on land administered by the Government of Nunavut. CanZinco has made several attempts to contact the Lands Administration of the Government of Nunavut but has not received a response as to whether additional land use permits are required for the proposed landfill. Continued attempts to resolve this question will be done in preparation for the public hearing.

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