

NANISIVIK MINE

A division of CanZinco Ltd.

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Sid Bruinsma
Nunavut Regional Office - Environmental Protection Branch
Qimugjuk Building 969 - PO Box 1870
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RE: Metal Mining Effluent Regulations.

Nanisivik Mine came under the Metal Mining Effluent Regulations in 2002. We started releasing water on July 8th, 2003 and continued until October 4th. We selected August 9th for our first Acute Lethality sample to meet the monthly requirement and then scheduled the next one for September 10th which was a few weeks prior to freeze up. We assumed that our interpretation of the monthly sampling requirement was correct, as we received no feedback indicating otherwise after submission of our annual and quarterly reports. We followed the same protocols this year and scheduled our first sample 30 days after decanting commenced as per our water license Part H item 15. This year, we began releasing water on June 24th and then selected July 24th as the date for our first Acute Lethality sample.

It has since been pointed out that we misinterpreted the regulations and that a sample should have been collected in June (once per calendar month) rather than monthly as stated in our water license. The annual thaw varies somewhat from year to year, so it is difficult to pinpoint the exact date when we will release. Part of the problem is the ice cover that remains right up until we are ready to release, so picking a sample date 30 days in advance that was actually possible would be a guess at best as it is difficult to obtain a sample from under the ice.

There are some discrepancies in the wording of the MMER, and our water license that caused the misinterpretation. The MMER requires the date to be selected at least 3 days prior to collection whereas our license requires us to select the date 30 days prior to collection. Also the frequency is listed as monthly in the water license and once per calendar month in the regulations. We will review both documents prior to sample date selection and collection for the 2005 season in an effort to ensure that we meet the requirements of the regulations. If further information is required please do not hesitate to contact me.

Regards,

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