



Nunavut Regional Office  
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NWB2NAN0208  
Our file - Notre référence

April 16, 2004

Phyllis Beaulieu  
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Nunavut Water Board  
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*Via electronic mail to:*  
**licensing@nwb.nunavut.ca**

**Re: Review of 2003 Geotechnical Inspection of Waste Containment Dikes -  
Nanisivik Mine, Nunavut**

On behalf of Indian and Northern Affairs Canada ("INAC"), I would like to thank the Nunavut Water Board ("NWB") for the opportunity to provide comment on 2003 Geotechnical Inspection of Waste Containment Dikes undertaken by BGC Engineering Inc. ("BGC") at the Nanisivik mine site on behalf of CanZinco Limited ("the Licensee").

The August/September 2003 geotechnical inspection and associated report prepared by BGC, and subsequently submitted to the NWB by the Licensee, were done so in accordance with the requirements of Water Licence NWB1NAN0208 ("the Current Licence"), Part H, Item 6.

INAC notes, however, that the geotechnical inspection report should have been accompanied by "...a covering letter from the Licensee outlining an implementation plan to respond to the Engineer's recommendations", as is also required by Part H, Item 6 of the Current Licence. In his cover letter of November 5, 2003, Mr. Carreau did not address this requirement, despite the extensive recommendations provided by BGC both in the report proper, and in the Project Memorandum of September 11, 2003 (Appendix 1).

It is possible that the Licensee had intentions of addressing issues of dike stability and associated repair/maintenance plans in the forthcoming Final Closure and Reclamation Plan ("FCRP"), submitted February/March 2004 under Part G of the Current Licence. While INAC appreciates that overlapping issues may exist in the FCRP, this does not exempt the Licensee from meeting the other requirements of the Current Licence. INAC therefore recommends that the Licensee, at the earliest available opportunity, provide the NWB with the missing implementation plan to complete their 2003 submission under Part H, Item 6.

Please do not hesitate to contact me if there are any further questions or concerns.

Best regards,

**Original signed by:**

Stephanie Hawkins

Qikiqtani Regional Coordinator, Water Resources

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