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Department of Environment

Ministère de l'Environnement

April 16, 2004

Ms. Phyllis Beaulieu
Licensing Administrator
P.O. Box 119
Gjoa haven, NU
X0B 1J0

Dear Ms. Beaulieu,

Re: NWB1NAN0208 - Review of 2003 Geotechnical Inspection of Waste Containment
Dikes – Nanisivik Mine, Nunavut

The following is the Government of Nunavut's (GN) review of the 2003 Geotechnical Inspection of Waste Containment Dykes (October 28, 2003), carried out at the Nanisivik Mine by BGC Engineering Inc. The site inspection visit was undertaken between August 30 and September 1, 2003. The report was posted to the Nunavut Water Board Public registry on Nov. 17, 2003.

The report from the site inspection is comprehensive and meets the requirements for a detailed geotechnical inspection. However, there is little indication included in the document as to how or when Breakwater Resources Ltd. intends to comply with the recommended maintenance necessary to guarantee present function as recommended in the Geotechnical Inspection.

Our concerns are heightened by the fact that the covering letter from Breakwater Resources Ltd. (Nov. 5, 2003) made no comment concerning maintenance issues identified within the report and by the fact that there is no implementation plan within the report or suggestion that the maintenance issues will be addressed as part of the mine closure plan (March 2004).

It is possible that some of the maintenance concerns may have already been taken care of last fall after the site inspection and are no longer an issue. If this is the case, it is suggested that Breakwater Resources Ltd. provide an update as to what maintenance repairs have already taken place and indicate how they intend to address those recommendations still outstanding.

Attached for the NWB's record is a copy of EBA Engineering Consultants Ltd. comments (April 16, 2004) from their review of the Geotechnical Inspection.

Sincerely,

Gladis Lemus, Ph.D.
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