From: Damien Côté
To: "Phyllis Beaulieu"; dts@nunavutwaterboard.org
Subject: FW: Re: Polaris long term monitoring plan
Date: Wednesday, December 12, 2012 2:04:36 PM

My apologies for not sending this information earlier. It pertains to Teck's licensing issues for Polaris.

Damien

Damien A. Côté
Executive Director | Directeur général
Nunavut Water Board | Office des eaux du Nunavut

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damien.cote@nunavutwaterboard.org

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Merci de penser à l'environnement avant d'imprimer ce courriel / Thank you for thinking of the environment before printing this email

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From: Murray Ball [mailto:Murray.Ball@aandc-aadnc.gc.ca]
Sent: Friday, December 07, 2012 8:18 AM
To: Damien.cote@nunavutwaterboard.org
Subject: Fwd: Re: Polaris long term monitoring plan

Damien,

Please see below correspondence for your information regarding AANDC advice to Bruce Donald of Teck Resources. If you have any questions, please give me a call.

Murray

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Murray Ball
Manager Water Resources
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>>> Murray Ball 11/29/2012 3:19 PM >>>
Hello Bruce,

Thanks for your email. My understanding is that Ian had responded to you with some general comments regarding the surface water monitoring plan that you circulated to us and encouraged you to proceed with your water licence application. Unfortunately, little has changed with regards to regulation in Nunavut guiding closure monitoring. You are correct in identifying that AANDC, with provincial-equivalent responsibility, lacks a highly prescriptive policy with respect to mine closure monitoring. We have the *Mine Site Reclamation Policy for Nunavut* (2003) and also rely to some extent on the *Mine Site Reclamation Guidelines for the Northwest Territories* (2007), but neither specifies monitoring timelines or frequencies. Our recommendation to you was that you look at best practice in other Canadian jurisdictions in developing your monitoring plans, noting that a 25 year monitoring window followed by re-assessment based on monitoring results at the end of that period does not appear to be uncommon.

The *Mine Site Reclamation Guidelines for the Northwest Territories* recommends that trigger levels for monitoring and maintenance be site-specific and consider designs and natural setting for physical stability issues, and for underground workings that periodic backfilling of areas of subsidence may be required. There is no reference to the length of time or frequency of monitoring may be appropriate.

For tailings impoundment areas, the guidelines indicate that water quality be monitored to confirm closure targets, but no mechanism is provided to define what closure targets should be.

I regret that I am not able to provide more definitive feedback based on our policy and regulations. AANDC has flagged the policy gap in this area. We will provide more detailed comments following our technical review which will be conducted through the Nunavut Water Board water licensing process. I encourage you to proceed with your water licence submission based on the application of best practices.

Regards,
Murray Ball
Manager, Water Resources

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>>> "Donald Bruce KIMB" <Bruce.Donald@teck.com> 11/28/2012 3:14 PM >>>
I emailed Ian Parsons sending him a copy of our recently completed proposed geotechnical monitoring plan for the former Polaris Mine site. Apparently he is out of the office until January and indicated that you were his contact in the interim.

Months ago we had submitted our surface water monitoring plan to Ian with the understanding that AANDC would review it and give us comments so we could consider what changes to make prior to it being finalized.

Now that we have our geotechnical plan in hand, as soon as we can finalize our water monitoring plan, we will be in a position to proceed with our new Water Licence application.

Do you know if there is anyone at AANDC that I can talk to with regard to the plan to find out what

comments AANDC has?

I know that Polaris has brought attention to the issue of how AANDC and the Water Board can deal with former reclaimed mine sites in the longer term and that currently there are no appropriate regulatory mechanisms in place. Has AANDC made any progress in terms of policy or potential legislation that will have any bearing on these types of situations? If so it would be useful for us to understand where these are at.

Regards,
Bruce Donald
Manager, Dormant Properties
Teck Resources Ltd.