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December 22, 2011

Our File: 4705 037 POLA  
NWB File: 1AR-POL0311

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

Via email: [licensing@nunavutwaterboard.org](mailto:licensing@nunavutwaterboard.org)

**Re: Comments related to cancellation of Polaris Type A water licence**

The Polaris mine, located on Little Cornwallis Island and ~100 km northwest of the Hamlet of Resolute Bay, operated as a lead-zinc mine from 1981-2002. The mine has been operating under a Type A licence since 2003 to complete abandonment and reclamation activities related to mine closure. The mine's Type A licence is set to expire Dec. 31, 2011. The current NWB referral is seeking advice from parties with respect to the path forward related to the future management of this closed mine site.

Specifically, NWB is seeking guidance on the following issues:

1. The appropriateness of canceling the existing Type "A" Licence (recognizing that under s. 46 of the NWNSRTA, the expiry or cancellation of a licence does not relieve the holder from any obligations imposed by the licence);
2. Further, prior to considering cancellation of the Type "A" and/or issuance of a Type "B" water licence, what information should be required by the NWB beyond the current license compliance reporting documentation and normal Type "A" renewal or Type "B" water licence application information?;
3. Whether, if the Type "A" Licence is cancelled, the on-going post-closure and reclamation monitoring activity is such that the Board can issue a Type "B" Licence to regulate only that activity; and
4. For those parties holding reclamation security, direction regarding the effects (if any) that the cancellation of the Type "A" Water Licence may have on the reclamation security that is held (including any changes to the amounts and mechanisms for releasing security in whole or in part).

With respect to (1), EC has no concerns with cancellation of the Polaris Type A water licence considering there are currently no triggers being exceeded at the site that would warrant regulation under a Type A licence.

With respect to (2), EC requests the Proponent provide an interpreted summary of all the water quality data that has been collected for this site during the licence term. The raw data should also be provided in the summary to permit verification of the analyses and trends presented in the report.

As for (3), EC agrees a Type B licence should be adequate for regulating on-going post closure and reclamation activities. EC commits to reviewing the monitoring plan, including the sampling frequency and parameters to be monitored, as proposed by the Proponent when they apply for their Type B licence.

Since EC holds no reclamation security related to the Project, EC has no comments related to this matter.

EC appreciates the opportunity to comment on the proposed approach to expiry of Polaris mine's Type A licence. Should you require any additional clarification regarding EC's comments related to our review, please feel free to contact me at (867) 975-4639 or via email at [allison.dunn@ec.gc.ca](mailto:allison.dunn@ec.gc.ca).

Sincerely,

A handwritten signature in blue ink, appearing to read "Allison D", followed by a long horizontal line.

Allison Dunn  
Sr. Environmental Assessment Coordinator

cc:

Carey Ogilvie, Head, Environmental Assessment-North, EPO, Yellowknife, NT  
Anne Wilson, Sr. Sector Expert, EPO, Edmonton, AB