Nunavut Regional Office P.O. Box 2200 Iqaluit, NU, XOA 0H0

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October 26, 2001

Rita Becker Licensing Administrator Nunavut Water Board P.O. Box 119 Gjoa Haven, NU, X0E 1J0

Polaris Mine Decommissioning and Reclamation Plan

Indian and Northern Affairs Canada (INAC), water management division, is pleased to present the following comments on Cominco's Decommissioning and Reclamation plan for Polaris Mines.

INAC believes that Cominco has conducted sufficient studies and have revised their Decommissioning and Abandonment plan sufficiently over the years to remove any major concern. The only small question we have remaining concerns a "worse case" scenario for Garrow Lake. Essentially, we would like a brief description of what Cominco plans to do should the layers of Garrow Lake suddenly mix, whether prior to or after the removal of the Garrow Lake Dam. Does Cominco plan on maintaining a dam indefinitely in such an event? Of course, since this represents more an emergency or worse case scenario, only a small paragraph or two would be required, not an overly detailed plan.

Also, INAC is aware that Environment Canada (EC) recommends that Cominco maintain the dam for 5 years after drawing down Garrow Lake back to its original level. The purpose of this is to monitor Garrow Lake and see if the results of the draw down match those predicted by Cominco's models before removing the dam. Seeing how the draw down of Garrow Lake is an unusual procedure and the predicted results are in no way assured, there is definitely merit to EC's suggestion. However, asking Cominco to return with heavy equipment 5 years later to remove the dam may be impractical. Although a 5 year study is certainly preferred, INAC is willing to accept a compromise; maintain the dam until everything else has been dealt with during the abandonment and restoration process. The removal of Garrow Lake Dam would therefore be the final step in the abandonment and restoration of Polaris Mine, just prior to the final evacuation of all the heavy equipment.

According to Cominco's closure schedule (Table 2.1), the draw down of Garrow Lake will end in 2002, when the waters level will be below its original level to allow the removal of the dam. The removal of the dam should take place in 2003, and the heavy equipment will be removed on November 30, 2004. With the compromise suggestion, Garrow Lake will hopefully be finished be being drawn down to its natural level by early 2002, the lake could be

monitored during the remainder of the season of 2002 and throughout 2003. In 2004, Cominco could finish drawing down the lake to levels adequate enough to remove the dam. The dam could therefore be removed in the fall of 2004 provided the accumulated data indicates the lake is stable.

If you have any question, please feel free to contact me at your earliest convenience.

Sincerely,

Original Signed By:

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