



Water Resources Division
Nunavut Regional Office
Iqaluit, NU
X0A 0H0

INAC CIDMS #: 1226804

September 6, 2018

NWB File: 1BR-CUL1118

Via email to: licensing@nwb-oen.ca

Richard Dwyer
Manager of Licencing
Nunavut Water Board
Gjoa Haven, NU, X0E 1J0

Dear Mr. Dwyer:

**Re: 1BR-CUL1118 – Cullaton Lake Mine Closure and Reclamation Plan
Review - Cullaton Lake Gold Mine – Barrick Gold Corporation**

The attached technical review memorandum is provided for the Nunavut Water Board's (NWB) consideration. Comments have been provided pursuant to the Department's mandated responsibilities under the Nunavut Waters and Nunavut Surface Rights Tribunal Act and the Department of Indian Affairs and Northern Development Act.

Should you have any questions or comments, please do not hesitate to contact me at (867) 222-9278 or by email at Ian.Parsons@canada.ca.

Sincerely,

Original signed by

Ian Parsons
Manager, Water Resources

Cc: Spencer Dewar, Director Resource Management CIRNAC
Erik Allain, Director of Lands CIRNAC



Technical Review Memorandum

Re: 1BR-CUL1118 – Cullaton Lake Mine Closure and Reclamation Plan Review - Cullaton Lake Gold Mine – Barrick Gold Corporation

1.0 Introduction

Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC) has reviewed the updated Cullaton Lake Closure and Reclamation Plan (CRP) dated June 30th, 2017. The updated CRP was prepared by the Palmer Environmental Consulting Group Inc. on behalf of Barrick Gold Inc. The updated plan was submitted as part of the Water License renewal process and combines information and data from studies completed since the submission of the prior Abandonment and Restoration (A&R) Plan into one comprehensive report. In addition to describing the remedial approach for the site, the document presents a proposed post-closure monitoring program.

Decommissioning activities at the mine began in 1990 after it was placed on care and maintenance. By 2003, when the property became wholly owned by Barrick, most aspects of the A&R Plan had already been implemented. Reclamation areas completed at the mine included underground mine workings, waste rock and overburden piles, a tailings containment area, buildings and equipment, mine infrastructure, landfills and other waste disposal areas and water management systems.

Within this context, it was CIRNAC's expectation that the updated CRP would: a) describe the previously completed remedial works; b) explicitly identify and address any site issues that have not been fully resolved; and c) describe any future actions that will be taken to ensure the site remains stable over the long-term.

CIRNAC provided comments on Barrick's CRP in a letter dated June 15, 2018 to the NWB.

On August 22, 2018 the NWB distributed Barrick's updated CRP for review.

2.0 Overall Review Findings

CIRNAC along with Arcadis Canada Inc. reviewed the updated final CRP for the Cullaton Lake Mine Site. The review found that Barrick had incorporated all of CIRNAC's previous recommendations outlined in its June 15, 2018 letter to the NWB, therefore CIRNAC is satisfied with the final CRP.



3.0 Financial Security

CIRNAC recommends that the financial security associated with the CRP for the Cullaton Lake mine property should be set at \$3,813,600.00. CIRNAC does not recommend that the amount be discounted.

4.0 Closure

In summary, CIRNAC has concluded that the Cullaton Lake Mine CRP presents a technically sound, logical approach to prevent and mitigate long-term impacts associated with the site. On this basis, CIRNAC supports the implementation of the CRP.

CIRNAC recommends that security under the Water Licence to be held by the Minister should be set at \$3,813,600.00.