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Your file - Votre référence
8BC-TEH0708
Our file - Notre référence
IQA-N 9545-2-2MEAR/CIDMS 155527

July 6th, 2007

Phyllis Beaulieu
Licensing Administrator
Nunavut Water Board
P.O. Box 119
Gjoa Haven, NU, X0A 1J0

Re: Water Management and Monitoring Plan - Meadowbank Project

Indian and Northern Affairs Canada (INAC) has performed a review of the Water Management and Monitoring Plan (WMMP), submitted to the Nunavut Water Board (NWB). In conducting our review INAC has made reference to the following documents:

- i. Water Management and Monitoring Plan- Golder Associates, March 12, 2007
- ii. Assessment of Acid Rock Drainage ESKER Samples- Golder Associates, March 8, 2007
- iii. Assessment of the ARD and ML of Rock from Potential Quarry 6- Golder Associates, March 8, 2007
- iv. Geochemical Assessment of Potential Quarry Rock- Golder Associates, March 20, 2007
- v. 8BC-TEH0708- Nunavut Water Board
Quality Assurance and Quality Control Guidelines for use by Class
- vi. "B" Licensees in Collecting Representative Water samples in the
Field and for submission of a QA/QC Plan- INAC, July 1996

INAC recognizes the proponent has combined two reporting requirements into one report namely, the Site Water Management Plan and the Monitoring Plan (including the Quality Assurance and Quality Control Plan) have been submitted as the Water Management and Monitoring Plan. INAC understood the intent of 8BC-TEH0708 was for the proponent to provide two separate stand alone documents, one for the Site Water Management Plan and one for the Monitoring Plan. Should the proponent wish to submit both information requirements under one document, INAC suggests the NWB require the proponent to improve the document structure. INAC suggest the proponent clearly separate all information required under Part B, Item 3 from information required under Part I, Item 1. Should the proponent feel strong relationships exist between the Site Water Management Plan and the Monitoring Plan, the proponent should clearly cross reference such information.

The WMMP was conceived and submitted to the NWB before the sampling season had begun. As a result, numerous pieces of information remain outstanding. For instance the following water licence conditions have yet to be reported: Part B: Item 3 Section i, Part B: Item 3 Section ii, Part B: Item 3 Section iii, Part B: Item 3 Section iv, Part B: Item 3 Section x, Part I: Item 1 Section iv and Part I: Item 1 Section v.

In INAC's opinion it is unclear as to when the above mentioned information will be reported to the NWB. Part B, Item 2, Section iv and Part I, Item 8 of 8BC-TEH0708 requires the results of the Monitoring Program be presented as part of the Annual Report, due shortly after the expiration of licence 8BC-TEH0708. INAC is unclear as to whether the all the information listed above will be reported in the Annual Report. Is INAC to assume the proponent is referencing the Annual Report in every case where the proponent states "results will be recorded and reported annually"?

Furthermore, the Annual Report does not capture all the outstanding information requirements. For instance the road construction schedule has evolved, meaning the June 2007 completion date is no longer valid. INAC suggests the proponent clearly define when they expect the remaining information will be submitted.

Section 4.1, Sampling Frequency, of the WMMP states "*water quality will be monitored...at all identified sampling locations where a sufficient volume of water is present to obtain a representative grab sample.*" INAC requests the proponent clearly delineate what criteria they intend to use in selecting their sampling locations. It is important reviewers and inspectors understand why sampling locations have been selected before any data is analyzed. Section 4.1 also states "*sampling frequency will be reevaluated after the first year (ice free period) of monitoring.*" Will information pertaining to a change in sampling frequency be presented to the NWB and reviewers?

Section 4.2, Monitored Parameters, of the WMMP lists proposed parameters for monitoring. INAC requests to know if these are the proposed parameters for all sampling locations?

Part I, Item 1, Section vi of NWB licence 8BC-TEH0708 states "*A description of the sampling methodology and the field sampling quality control/quality assurance plan, in accordance with INAC QA and QC Guidelines for use by Class "B" Licensees in Collecting Representative Water samples in the Field and for submission of a QA/QC Plan (1996).*" Based on the brief discussion of QA/QC in Section 4.3 of the WMMP it appears the INAC guideline was not fully consulted. For instance, the following sections of the INAC guideline should be referenced: Section 2 (Sample Collection), Section 3 (Sample Handling) and Section 4 (Lab Analysis). Additionally, the proponent should ensure the terminology employed in their QA/QC plan is consistent with the INAC guideline. Otherwise, the proponent is encouraged to define any terminology that may differ from the INAC guideline (example: field duplicate and trip blank).

INAC strongly encourages the NWB suggest all reports submitted to the NWB for review reference the section of the water licence the proponent intends to address. INAC feels such information should appear regularly throughout the document and will benefit all parties in

terms of information management. Clearly presented information substantially reduces the time and effort expended during document review and thus expedites the entire process for all parties.

In closing, INAC reserves the right to fully analyze documents listed as iii, iv, v during the Type 'A' licence hearing. Such material will be reviewed with reference to the previously submitted Road Alignment Quarry Site Geochemistry Final Report (2005) and any future information the proponent presents with respect to the Meadowbank access road.

Should you have any questions or comments, please do not hesitate to contact me at (867) 975-4548 or by email at BathoryS@ainc-ianc.gc.ca.

Sincerely,

Original Signed By

Stephen Bathory
Regional Coordinator