

NIRB File No.: 05MN047 NWB File No.: 2AM-DOH0713

November 15, 2010

Christopher Hanks
Director, Environment and Social Responsibility
Hope Bay Mining Ltd.
North Vancouver, BC V7P 3S1

Via E-mail: Chris.Hanks@newmont.com

Re: <u>HBML's Amendment Application Package No.2 for the Type A Water Licence for the Doris North Gold Mine Project</u>

Dear Mr. Hanks,

On October 29, 2010 the Nunavut Impact Review Board (NIRB or Board) received Hope Bay Mining Ltd.'s (HBML) Amendment Application Package No. 2 for its Type A Water Licence associated with the Doris North Gold Mine Project (the Project). By submitting this application, HBML is requesting that the Nunavut Water Board amend its Type A Water Licence to permit HBML to construct and operate the following:

- Expansion of fuel storage and containment facility from 14 to 36 ML by installing additional fuel tanks at Roberts Bay;
- Airstrip expansion/bypass road construction; and
- Relocation of cyanide/reagent storage facility.

All documents received and pertaining to this amendment package can be obtained from NIRB's ftp site at:

http://ftp.nirb.ca/03-MONITORING/05MN047-DORIS%20NORTH%20GOLD%20MINE/01-PROJECT%20CERTIFICATE/AUTHORIZATIONS/NWB-

TYPE%20A%20WATER%20LICENSE/06-AMENDMENT/2AM-

DOH0713%20Amend%20No%202/including:

- *Application for Water Licence Amendment Form;*
- Executive summary of Project Description in English, Inuktitut (Inuinnaqtun to follow as soon as available);
- *Project Description*;
- Executive summary of consultant supporting reports (SRK, Rescan) in English, Inuktitut (Inuinnagtun to follow as soon as available);

- Project Description, Appendix A: Detailed design memo and drawings prepared by SRK Consultant Engineers describing the additional fuel tanks at Roberts Bay;
- Project Description, Appendix B: Detailed design memo and drawings prepared by SRK Consultant Engineers describing the airstrip expansion and bypass road;
- Project Description, Appendix C: Detailed design memo and drawings prepared by SRK Consultant Engineers describing reagent and cyanide storage;
- Project Description, Appendix D: Memo prepared by Rescan Environmental Services Ltd. considering environmental matters identified in the SIG;
- Project Description, Appendix E: Memo prepared by Points West regarding archaeological matters;
- Project Description, Appendix F: HBML compliance report; and
- *Project Description, Appendix G: Reclamation security calculation.*

The Doris North project has previously been reviewed by the NIRB pursuant to Article 12 of the Nunavut Land Claims Agreement (NLCA) and is currently being monitored by the NIRB through the provisions of NLCA Article 12, Part 7 and Project Certificate # 003. As such, the NIRB is required to determine whether or not the proposed changes to the Project constitute a significant change to the scope of the Project as previously reviewed, and if so, how the proposed changes could influence the impact predictions contained within the Environmental Impact Statement (EIS) for the Project as well as the mitigation measures contained within the current operating plans and authorizations for the Project. Ultimately, the NIRB is required to determine whether or not the proposed changes are acceptable, and whether the terms and conditions of Project Certificate #003 will continue to achieve their purposes or if changes may be required.

The NIRB notes that HBML has provided supporting rationale for the proposed licence amendment, including brief discussions in respect of potential environmental effects including cumulative effects, and proposed mitigation measures in the package.

However, following a preliminary review of the submission, the NIRB has determined that there has been insufficient information provided with which to adequately assess the proposed changes to the Project. For each of the proposed changes, the Board requires that HBML contrast the change with what was originally reviewed by the NIRB, providing direct reference to the impact assessment predictions and associated mitigation and monitoring measures contained within the Final EIS and committement for the Project, including relevant page numbers and section headings wherever possible. Specifically, the NIRB requests HBML provide the following information on or before **December 6, 2010**:

- 1. Expansion of fuel storage and containment facility:
 - Comparison of the estimates of fuel consumption contained within the Final EIS with the currently proposed estimates for fuel consumption for the Project. Supporting rationale for the required increases should also be provided;
 - Discussion of potential for increased greenhouse gases (GHGs) emission rates and potential impacts on air quality at local and regional scale, using appropriate air quality Dispersion Model(s); and

- Updated statement of the Project's predicted greenhouse gas contributions to Nunavut and Canada.
- 2. Airstrip expansion/bypass road construction:
 - Description of the increase in the project footprint relative to the proposed changes;
 - Assessment of the disturbance and loss of vegetation abundance as a result of the proposed airstrip expansion/bypass road construction; and
 - Description of the projected air traffic volume including type of aircraft comparing to prediction contained in the FEIS, and potential escalated noise levels.
- 3. Monitoring and mitigation of potential impacts:
 - More detailed information, including disposal options (where applicable) and monitoring measures to verify that the potential Acid Rock Drainage (ARD) and Metal Leaching (ML) is not a concern for rock in Quarry #5 and from a small knoll southeast of airstrip, recognizing that some rock samples in the Quarry #5 have been classified as uncertain and potentially acid generating (PAG), while the ARD classification work has not completed for rock cut from the knoll southeast of airstrip.
 - Description of proposed mitigation strategies to mitigate potential impact resulted from the proposed changes, with particular attention to the mitigation of potential cumulative effects.
 - Listing of environmental management and monitoring plans that would be updated/finalized to encompass proposed project changes, including the major points to be incorporated in the updated/finalized plans.

Please forward all forthcoming submissions to the NIRB at <u>info@nirb.ca</u> or via fax at (867) 983-2594.

If you have any questions or require further clarification regarding the NIRB's information requirements, please contact Li Wan, Technical Advisor and the NIRB's Monitoring Officer for the Doris North project at lwan@nirb.ca or by phone (867) 983-4606.

Best regards,

Ryan Barry

Ryan Barry

Director, Technical Services Nunavut Impact Review Board

Nunavut Impact Review Board

Cc: Phyllis Beaulieu, Nunavut Water Board (<u>licensing@nunavutwaterboard.org</u>)

Doris North Distribution List