



## Groundwater

No information can be found that determines rate or direction of groundwater flow at the site, and the subsequent impacts on water balance. We recognise that assumptions are made that groundwater intrusion to the tailings facility and mine workings will be negligible, however, there is no baseline information or assessment of this impact.

### *Regulatory Regime*

It is not clear from reviewing the documents that GN Regulations and various Guidelines have been fully taken into consideration, in particular the following (which are available upon request):

- GN Regulation 'Spill Contingency Planning and Reporting'
- Spill Contingency Planning & Spill Reporting in Nunavut: A guide to the New Regulations
- GN Guideline 'General Management of Hazardous Wastes'
- GN Guideline 'Contaminated Site Remediation'
- GN Guideline 'Dust Suppression'

### *Management plans*

The NIRB guidelines call for the development of practical management plans for environment protection. With the exception of Wildlife Mitigation and Monitoring Plan and the Emergency Response and Contingency plans, no such plans exist. Currently management actions are scattered throughout the documents and need to be drawn together into coherent documents.

Chapter 5 of the Technical Report lists numerous plans, including Environment Protection Plans that will be developed, but it appears that these are currently conceptual.

### *Monitoring Plans*

It is recognised that MHL have developed an Effluent and Aquatic Monitoring Plan, however, this monitoring plan, needs feedback to inform adaptive management. If monitoring demonstrates non-compliance or that water quality differs from predictions, then action must be taken. Adaptive management does not currently form part of this plan.

The DOE reserves the right to provide further technical input into the review of the DEIS for the Doris North Gold Mine Project at a later date.

We are mindful of the timelines indicated by NIRB in their letter dated June 17 2005 and we will strive to provide NIRB with timely advice. However, we would like NIRB to recognise that the review of such documents requires a great deal resources, and that both the Territorial Government and Federal Governments

have internal approval processes for comments provided to NIRB. Considering that interventions are normally required by NIRB 10 working days before Technical Meetings, and that NIRB are proposing to conduct these meetings in the second week of August, interveners will have little more than 3 weeks to review the DEIS. As indicated in our May 20 letter to NIRB, DOE request a period of 60 days for this stage of the review. This is necessary to ensure that the information provided to NIRB is of sufficient quality to allow the Board to make decisions.

Once again we thank NIRB for the opportunity to provide comments on the Doris North Project.

Yours sincerely

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