

P.O. Box 360 Kugluktuk, NU X0B 0E0 Telephone: (867) 982-3310 Fax: (867) 982-3311 www.kitia.ca

Kugluktuk

Bathurst Inlet
Kingaok
50%UD°

Bay Chimo Umingmaktok ⊳୮<sup>ൟ</sup>L<sup>ь</sup>⊃҅<sup>ҁ</sup>ь

Cambridge Bay Ikaluktutiak ムらつらつくら

Gjoa Haven Okhoktok

Taloyoak

Kugaaruk dÜ<sup>s</sup>z<sup>b</sup> March 24, 2011

Phyllis Beaulieu Manager of Licencing Nunavut Water Board Gjoa Haven, NU X0B 1J0

Re: 2AM-DOH0713 F1 Interim Water Management Plan

Via Email: <u>licensing@nunavutwaterboard.org</u>

Dear Ms. Beaulieu

The Kitikmeot Inuit Association (KIA) has reviewed the submitted *Interim Water Management Plan* regarding HBML's Doris North Gold Mine Project, and KIA has engaged BGC Engineering (BGC) to assist us with the technical review. The KIA has several concerns regarding this interim management plan, and we request the following details and/or clarifications:

- 1. HBML should standardize the terms used to define areas. Terms are sometimes used interchangeably, and sometimes not defined properly defined, causing confusion.
- 2. HBML should clarify the design life of the facility, and whether the facilities would or could expand to meet future development needs.
- 3. As-built or IFC details of the facilities are needed, including:
  - a. pump sizes, capacity and back-up plans, as well as discharge protocol;
  - b. clarification of where the diversion pumps divert water to, and how the water is collected;
  - c. confirmation that construction materials are geochemically benign and free from blasting residues;
  - d. liner details (the pads, Pollution Control Pond and the Sedimentation Pond should be lined with an impervious liner in order to direct flow and store potentially contaminated water);
  - e. confirmation of design capacity for the current pond size, and that capacity can be increased as and when needed.
- 4. HBML should explain the reasoning for using a 1:25 year 24 hour event rather than a 1:100 year 24 hour event.
- 5. The Plan should provide more details regarding mitigation options in the event that the Pollution Control Structure and the Sedimentation Pond are full of contaminated water due to a storm event. Has HBML considered a scenario where the Land Farm Pond (mitigation option 3) may also be full, and therefore unavailable?
- 6. The Plan figures suggest that Pad R reports to the Sedimentation Pond. Is this correct, or does it report to the Pollution Control Pond?
- 7. Details are needed regarding the Reverse Osmosis (RO) Plant:



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- a. HBML should confirm that the RO plant will be built and ready to use prior to the need to treat contaminated/non-compliant water;
- b. Waste stream flows need to be detailed;
- c. How will HBML manage contaminated/non-compliant water that requires further treatment?
- d. IFC designs are needed. A geotechnical engineer should supervise construction, and an independent geotechnical engineer should inspect the facility annually.
- 8. The Interim Plan should incorporate additional details regarding snow removal and management.
- 9. Water quality and freeboard monitoring frequency should increase after a storm event and/or when ponds approach maximum carrying capacity.

KIA cannot properly assess and manage risk on Inuit Owned Lands without details addressing the above-mentioned points. As such, we are continuing our review and we will raise any further issues or concerns with the NWB and/or HBML as they become apparent.

The KIA would like to thank the NWB for the opportunity to comment on this file. Please contact us if you have any questions.

Sincerely,

Luigi Torretti

Senior Environment Officer

Kitikmeot Inuit Association

Dep't of Lands & Environment