



Water Resources Division  
Resource Management Directorate  
Nunavut Regional Office  
P.O. Box 100  
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Your file - Votre référence  
2AM-DOH1335  
Our file - Notre référence  
CIDM# 1241128

February 25, 2019

Licence Administrator  
Nunavut Water Board  
P.O. Box 119  
Gjoa Haven, NU, X0B 1J0  
E-mail: [licensing@nwb-oen.ca](mailto:licensing@nwb-oen.ca)

**Re: Crown-Indigenous Relations and Northern Affairs Canada's Review of the Waste Rock, Ore & Mine Backfill Management Plan for the Hope Bay Project, Water Licence No. 2AM-DOH1335 Amendment 2, Water Licence No. 2AM-BOS1835, and Water Licence No. 2BB-MAE1727 Amendment 2**

Dear Ms. Porter,

Thank you for your January 31, 2019 invitation for Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC) to comment on the Waste Rock, Ore & Mine Backfill Management Plan for TMAC Resources Inc.'s (TMAC's) Hope Bay Project. Amendment No. 2 to the Doris North Water Licence, No. 2AM-DOH1335, was issued in December 2018 and an updated Waste Rock, Ore & Mine Backfill Management Plan (Version 6) was submitted by TMAC in January 2019. The changes to the Plan are principally updates to conform to changes made in the amended Water Licence for Doris North. The submission of Version 6 is also intended to meet requirements under Water Licence No. 2AM-BOS1835 and Water Licence No. 2BB-MAE1727 Amendment 2, also for the Hope Bay Project.

CIRNAC examined the submission. Comments below are provided pursuant to CIRNAC's mandated responsibilities under the *Nunavut Waters and Nunavut Surface Rights Tribunal Act* and the *Department of Indian Affairs and Northern Development Act*.

## **1. Details of In-Place Mitigation Measures of Inappropriate Construction Material**

### Reference:

- Hope Bay Project, Waste Rock, Ore and Mine Backfill Management Plan, Version 6, TMAC Resources Inc., January 2019, Section 4.2.



The following quote referring to in-place mitigation is found on page 36:

In the unlikely event that the results of the seep monitoring program or the confirmatory sampling program (Section 3.2) indicate the presence of material with an elevated potential for ML/ARD has been used in construction, further investigations will be undertaken to define the extent and assess the potential impacts of the material. If warranted, and after discussion with the appropriate regulatory agencies, the material may be mitigated in place or excavated and hauled to the waste rock stockpile for eventual disposal underground.

CIRNAC seeks clarification on what in-place mitigation will entail.

Recommendation:

CIRNAC requests further details on the actions to be taken to mitigate inappropriate construction materials, should these materials be discovered after they have been used in construction.

## **2. Non-mineralized Diabase as Construction Material**

Reference:

- Hope Bay Project, Waste Rock, Ore and Mine Backfill Management Plan, Version 6, TMAC Resources Inc., January 2019, Section 3.2.

In Version 5 of the Waste Rock, Ore and Mine Backfill Management Plan, non-mineralized diabase from the Doris Project had been identified as a candidate construction material and criteria were provided for using non-mineralized diabase for construction outside of the Pollution Containment System. In Version 6, non-mineralized diabase was not mentioned.

Recommendation:

CIRNAC requests clarification on whether non-mineralized diabase from the Doris Project will continue to be used as a construction material, and if not, the rationale behind the decision to discontinue its use.

## **3. Figure Numbers**

Reference:

- Hope Bay Project, Waste Rock, Ore and Mine Backfill Management Plan, Version 6, TMAC Resources Inc., January 2019, Figures.



Figure numbers are referenced in the text of the Waste Rock, Ore & Mine Backfill Management Plan, however, aside from Figure 2.1, the figure numbers referenced in text do not match the corresponding figure numbers in the Figures section.

Recommendation:

CIRNAC recommends adding the figure numbers referenced in text to the corresponding figures to improve ease of reference.

If there are any questions or concerns surrounding the above comments, please contact me at (867) 975-4282 or [bridget.campbell@canada.ca](mailto:bridget.campbell@canada.ca) or Godwin Okonkwo at (867) 975-4550 or email [godwin.okonkwo@canada.ca](mailto:godwin.okonkwo@canada.ca).

Sincerely,

Bridget Campbell,  
Water Resource Coordinator

CC: Oliver Curran, Adam Grzegorzczuk, Shelly Potter, Ashley Mathai, TMAC Resources Inc.