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Kugluktuk

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Bay Chimo Umingmaktok ⊳୮^ൟL^ь⊃்^ҕь

Cambridge Bay Ikaluktutiak ∆⁵b⇒⁵⊃°∩⊲⁵⁵

Gjoa Haven Okhoktok

> Taloyoak Cン⁵てくつ⁵b

Kugaaruk dÜ^s≺^b March 10, 2011

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

Re: 110210 2AM-DOH0713 Request Pursuant to Part G, Items 16 and 17

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

Dear Ms. Beaulieu

The Kitikmeot Inuit Association (KIA) has reviewed the submitted *Waste Rock and Ore Management Plan* regarding HBML's Doris North Gold Mine Project, and KIA has engaged BGC Engineering (BGC) to further assist us with the technical review. In general, the HBML management plan is a good comprehensive summary, but there are some important details that KIA would appreciate clarification on.

The requested details are as follows:

- Construction details (preferably "as-built" drawing) regarding the pollution control
 system, i.e., the waste rock and ore storage pads, and the sedimentation and pollution
 control ponds. These details would provide clarity regarding the adequacy and
 effectiveness of the system, such as, for example, the exchange between the
 sedimentation pond and the pollution control pond, the extent of coverage of the HDPE
 liner, etc., etc.
- 2. An estimate is requested regarding the maximum storage capacity of the waste rock pad based on maintaining stable slopes.
- 3. Details and justification are needed regarding the characterization, classification and segregation of waste rock. More specifically:
 - a. The proposed two categories (mineralized and non-mineralized rock) to classify waste rock do not necessarily correspond to PAG and Non-PAG rock
 - b. Will visual inspection, based on presence of sulphides, be sufficient to adequately characterize the waste rock?
 - c. No specific testing was proposed to be carried out on waste rock material designated for use in construction. The material needs be assessed for metal leaching potential, and the environmental impacts of the soluble metals species must be considered.
- 4. Details are needed regarding the projected volumes and proportions of the different waste rock management units (i.e., mineralized and non-mineralized waste rock). What is the contingency plan if there is excess "mineralized" waste rock (i.e., exceeding backfill capacity) when backfilling begins?



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5. Clarification and details are requested regarding whether HBML is designing the pollution control system to withstand 1:100 year 24-hour duration storms, or 1:25 year 24-hour duration storms.

Without details addressing the five points mentioned above, KIA cannot properly assess and manage risk on Inuit Owned Lands associated with HBML's current *Waste Rock and Ore Management Plan.* 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