Environmental Protection Operations Directorate Prairie & Northern Region 5019 52nd Street, 4th Floor P.O. Box 2310 Yellowknife, NT X1A 2P7

ECCC File: 6100 000 036/010 NWB File: 2AM-DOH1335



January 22, 2021

via email at: licensing@nwb-oen.ca

Richard Dwyer
Manager of Licencing
Nunavut Water Board
P.O. Box 119
Gjoa Haven, NU X0B 1J0

Dear Mr. Dwyer:

RE: 201218 2AM-DOH1335 Notice Modification - Installation of Madrid North Portal Pad Contact Water Pond

Environment and Climate Change Canada (ECCC) has reviewed the information submitted to the Nunavut Water Board (NWB) by TMAC Resources Inc. (the Proponent) regarding the above mentioned submission. This letter provides ECCC's specialist advice based on our mandate, in the context of the *Canadian Environmental Protection Act*, the pollution prevention provisions of the *Fisheries Act*, the *Migratory Birds Convention Act*, and the *Species at Risk Act*.

The Following comment is provided:

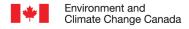
Topic: Discharge of Contact Water Pond to Tundra

Reference

Cover Letter – Monitoring

Comment

The Proponent is planning to install a new contact water pond (CWP) and surface water diversion berms in proximity to the existing Madrid North Portal Pad. As noted by the Proponent, this pond is required to capture runoff observed from the downstream toe of the Madrid Portal Pad, which contained elevated levels of chloride and ammonia. The cover letter states that, "an updated Hope Bay Project Doris-Madrid Water Management Plan will be provided to the NWB prior to operation of the CWP. The management plan will require a tundra discharge location under Water Licence 2AM-DOH1335 Part F, Item 18, a., which includes the same discharge criteria granted for the existing CWP located adjacent to the Madrid North waste rock pile." ECCC notes that the Licence condition referenced, and the effluent quality criteria included in that condition, does not include the contaminants of potential concern that were observed in the seepage from the Madrid North Portal Pad. Given that the contaminants of concern are not reflected in the existing tundra discharge requirements, it may be appropriate to transfer water





collected in the contact water pond to the Tailings Impoundment Area (TIA) in order to minimize potential impacts associated with discharge to the tundra and nearby surface waters due to chloride and ammonia.

ECCC Recommendation

ECCC recommends that contact water collected in the new contact water pond be transferred to the Tailings Impoundment Area for discharge, rather than be discharged directly to the tundra.

If you need more information, please contact Cari-Lyn Epp at (306) 491-2372 or <u>Cari-Lyn.Epp@Canada.ca</u>.

Sincerely,

Cari-Lyn Epp Senior Environmental Assessment Officer, PNR

cc: Brian Asher, Acting Head, Environmental Assessment North (NT and NU)