



Indian and Northern  
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Nunavut Regional Office  
Operations Directorate  
Water Resources Division  
P.O. Box 100  
Iqaluit, NU X0A 0H0

File 9545-2-1.2AM.DOHA  
CIDMS #336122

June 2, 2009

*Via Email*

Phyllis Beaulieu  
Manager of Licensing  
Nunavut Water Board  
P.O. Box 119  
Gjoa Haven, NU X0E 1J0

Dear Phyllis,

**Subject      Water License #2AM-DOH0713, Hope Bay Mining Ltd., Doris  
North Gold Project, Kitikmeot Region, Notice of Care and  
Maintenance**

Please be advised that on behalf of Indian and Northern Affairs Canada, I have completed a review the above referenced Hope Bay Mining Ltd. submission to the Nunavut Water Board.

A Technical Review Memorandum (attached) is provided to the Board for consideration.

Should you have any questions regarding this submission, feel free to contact me at 867-975-4555 or [David.Abernethy@inac-ainc.gc.ca](mailto:David.Abernethy@inac-ainc.gc.ca).

Regards,  
David W. Abernethy

Cc.    Kevin Buck, Water Resources Division Manager

# Technical Review Memorandum

Date: Jun. 2/09

To: Phyllis Beaulieu, Nunavut Water Board

From: David Abernethy, Indian and Northern Affairs Canada, Water Resources Division, Iqaluit, NU

Re: **Water License #2AM-DOH0713, Part L, Item #2 – Hope Bay Mining Ltd. – Doris North Gold Project – Notice of Care and Maintenance**

## A. PROJECT DESCRIPTION

On May 15/09 the Nunavut Water Board (NWB or Board) distributed Hope Bay Mining Ltd.'s (HBML) Notice of Care and Maintenance pursuant to Part L, Item #2 of their Doris North Gold Project's Type A Water License, #2AM-DOH0713. This notice applies to those license conditions identified by HBML. The NWB requested representations from interested parties by May 29/09.

HBML has decided to defer construction of the Doris North Mine pending further advanced exploration of the Hope Bay Belt. Consequentially, several license conditions do not apply to the project's current status. After discussing this issue with NWB staff on Apr. 3/09, HBML submitted documentation for consideration on Apr. 21/09. These are as summarized below:

- "A status report on facilities and activities permitted under the water license;"
- A summary of certain provisions of the Water License that are not applicable to HBML's current operations under the Type A Water License (given the deferral of the Doris North Mine) and a marked copy of the Water License further delineating these requirements;" and,
- "A summary of the status of commitments under the NIRB Project Certificate relating to issues of water use, water quality, and waste control."

It is noted that "HBML plans to file a revised Project Description with an application to amend their NIRB Project Certificate and water license (some time between mid to late 2009). In the interim period, HBML will continue to conduct advanced exploration activity in the Hope Bay Belt utilizing the camp, airstrip, port, and the Roberts Bay road infrastructure, that was originally planned and approved for the Doris North Mining Project, in accordance with the current Water Licence."

The following documentation was made available by the NWB for this review:

- HBML. *Current Application of Doris North Type A License 2AM-DOH0713 (the “Water Licence”).* Letter to the NWB. North Vancouver: Apr. 21/09;
- HBML. *Status Report on Facilities and Activities Under Water Licence 2AM-DOH0713 (Doris North) Prepared for the Nunavut Water Board.* North Vancouver: Apr. 21/09;
- HBML. *Summary of the Current Application of Provisions of the Type A Water License.* North Vancouver: Apr. 21/09;
- HBML. *Marked Copy of Water Licence No: 2AM-DOH0713.* North Vancouver: Apr. 21/09;
- HBML. *Status of Commitments Under the NIRB Project Certificate Relating to Issues of Water Use, Water Quality, and Waste Control.* North Vancouver: Apr. 21/09;
- HBML. *Notice Provided Under Section L.2. of the Doris North Type A Licence 2AM-DOH0713 (the “Water License”).* Letter to the NWB. North Vancouver: Jan. 13/09.

## **B. RESULTS OF REVIEW**

The following comments / recommendations are provided to the Board for consideration:

### **1. Notice of Care and Maintenance**

- After reviewing the documents submitted, INAC is of the opinion that the focus of project activity has changed at the site – this should not be considered “Care and Maintenance.” A formal license amendment should be required that specifically advises the conditions that are applicable at this point in time. In addition, the Board should place a condition in such an amendment that requires the proponent to provide at least 60 days notice as to when the original license conditions become applicable again. Therefore the Board should subsequently advise HBML to apply for an amendment as soon as possible noting that this proposal is satisfactory in the interim.

## **2. Apr. 21/09 Summary of the Current Application of Provisions of the Type A Water License**

- HBML states that their Hazardous Materials Management Plan and Emergency Response and Spill Plan are being upgraded to reflect actual project activities. INAC recommends that HBML be required to submit these revised plans to the Board for approval as soon as practical;
- HBML incorrectly states that Part G, Item #22 applies to the operation of a Tailings Impoundment Area when it concerns the operation and maintenance of landfill, landfarm, and fuel storage and containment facility sumps. Regardless, Part G, Item #22 (a), (b), (c), and (d) do not apply to the project's current status as indicated by HBML in the red-lined marked copy of their water license;
- HBML states that they are preparing an Incineration Management Plan as part of their Material Management Plan. Reference is made to the use of a dual-chambered incinerator designed to meet the Canada-wide Standards for dioxins, furans, and mercury is made. HBML must immediately submit this Plan to the Board for approval;
- According to HBML, "There is an Interim Reclamation and Closure Plan filed with the NWB. Generally, since HBML is not currently undertaking mining operations, the provisions identified in Part L are not applicable; however, the requirements will be followed as appropriate for existing facilities, activities, and infrastructure."

Part L, Item #5 requires HBML to review their Interim and Closure Plan and modify the Plan according to any changes in operation and/or technology. Revisions to the Plan are to be submitted in the form of an addendum to be included with an Annual Report. INAC recommends that the Board require HBML to provide a revised Interim Reclamation and Closure Plan, based on the project's current operational status, for approval as soon as practical.