

PLAN FOR COMPLIANCE
2AM-LUP0914

Note that comments in blue underlined text mark revisions to the previously submitted Plan for Compliance dated April, 2013

Licence Condition		Status of Compliance	Short Term Plan for Compliance	Schedule for Implementation of Short Term Plan for Compliance	Long Term Plan for Compliance	Schedule for Implementation of Long Term Plan for Compliance
PART A - SCOPE, ENFORCEMENT, DEFINITIONS						
Scope						
1	<p>a</p> <p>This Licence authorizes Lupin Mines Incorporated ("LMI" or "Licensee") to use Water and dispose of Waste associated with Mining and Milling undertakings in accordance with Schedule V of the Regulations at the Lupin Mine, located on the west shore of Contwoyto Lake, within the Kitikmeot Region, Nunavut (approximate Latitude 65°46'N and Longitude 111°14'W), as outlined in the Water Licence Renewal Application.</p> <p>LMI may conduct mining, milling and associated activities at the Lupin Mine located on the west shore of Contwoyto Lake, Nunavut, (65°46'N, 111°14'W) including, in general, as follows:</p> <ul style="list-style-type: none"> ● Use of water for Mining and Milling and associated activities; ● Deposit of tailings slurry into the Tailings Containment Area (TCA); ● Deposit of tailings paste into underground works; ● Deposit and treatment of Sewage into Sewage Disposal Facilities; ● Discharge of effluent from TCA; ● Discharge of effluent from Sewage Disposal Facilities; ● Progressive Abandonment and Reclamation of Mine facilities; ● Care and Maintenance of facilities ● Monitoring Program; ● Operations of site infrastructure including: <ul style="list-style-type: none"> o Mining and Milling structures; o Water intake and supply facilities; o Mine site camp facilities; o Tailings Containment Area; o Tailings Line and associated facilities; o Sewage Disposal Facilities; o Mine site roads; o Mine site airstrip; o Breakwater and Causeway; o Fuel Storage Facilities; 	Compliant.				

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	b	This Licence is issued subject to conditions contained herein with respect to the taking of Water and the depositing of Waste of any type in any Waters or in any place under any conditions where such Waste or any other Waste that results from the deposits of such Waste may enter any Waters. Whenever new Regulations are made or existing Regulations are amended by the Governor in Council under the Act, or other statutes imposing more stringent conditions relating to the quantity, type or manner under which any such Waste may be so deposited, this Licence shall be deemed to be subject to such requirements.	Compliant.				
	c	Compliance with the terms and conditions of this Licence does not absolve the Licensee from responsibility for compliance with all applicable legislation, guidelines and directives.	Under review.				
Enforcement							
2	a	Failure to comply with this Licence will be a violation of the Act, subjecting the Licensee to the enforcement measures and the penalties provided for in the Act.	See AANDC Water Use Inspection Forms dated July 5&6, 2012 by Eva Paul and July 9, 2011 by A. Keim.				
	b	All inspection and enforcement services regarding this Licence will be provided by Inspectors appointed under the Act.	No Water Use Inspection Forms are on file for 2009, 2010, or 2013. An AANDC Lands inspected the site July, 2013.				
	c	For the purpose of enforcing this Licence and with respect to the use of Water and deposit or Discharge of Waste by the Licensee, Inspectors appointed under the Act, hold all powers, privileges and protections that are conferred upon them by the Act or by other applicable law.	Since issuance of the Licence renewal, no enforcement measures or penalties have been incurred.				
Definitions							
3	a	The Licensee shall refer to Schedule A for definitions of terms used in this Licence.	Compliant.				

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PART B - GENERAL CONDITIONS						
1		<p>Water use fees are based on 1,700,000 m3 of authorized water use per year.</p> <p>Water use fee for 2009 is owed in the amount of \$63.14.</p> <p>Payment for 2010 is up to date.</p> <p>Payment for 2011 paid in the amount of \$63.14; however new water use fee calculator determined that \$23,050.00 is owed. Correspondence between NWB, AANDC, and MMG indicates that 2011 water use fee discrepancy is unresolved.</p> <p><u>Payment for 2012 in the amount of \$23,050.00 was made March 15, 2013.</u></p> <p><u>Payment for 2013 in the amount of \$23,050.00 was made February, 2014.</u></p>				
		The Licensee shall file an Annual Report with the Board, not later than March 31st of the year following the calendar year reported and shall be developed in accordance with Schedule B.				
	Schedule B Item 1	The Annual Report referred to in Part B, Item 2, shall include:				
	a	The monthly and annual quantities in cubic metres of water pumped from Contwoyto Lake at Station Number LUP-01;				

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2	b	<p>Compliant.</p> <p><u>2012: Annual report received by NWB April 30, 2013</u></p> <p>2011: Annual report received by NWB March 31, 2012</p> <p>2010: Annual report received by NWB April 8, 2011</p> <p>2009: Annual report received by NWB April 19, 2010</p>				
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3		Compliant.				
4		Compliant.				

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5	The Licensee shall maintain, to the satisfaction of the Inspector, all the signs necessary to identify the stations of the annexed "Monitoring Program".	Compliant.				
6	The Licensee shall ensure a copy of this Licence is maintained at the site of operation at all times in English, Inuktitut and Inuinnaqtun.	Compliant.				
7	Any communication with respect to this Licence shall be made in writing to the attention of: Manager of Licensing Nunavut Water Board P. O. Box 119 Gjoa Haven, NU X0B 1J0 Telephone: (867) 360-6338 Fax: (867) 360-6369 Email: licensing@nunavutwaterboard.org	Compliant.				
8	Any notice made to an Inspector shall be made in writing to the attention of: Water Resources Officer Nunavut District, Nunavut Region P.O. Box 100 Iqaluit, NU X0A 0H0 Telephone: (867) 975-4295 Fax: (867) 979-6445	Compliant.				
9	The Licensee shall submit one (1) paper copy and one (1) electronic copy of all reports, studies, and plans to the Board, or as otherwise requested by the Board. Reports or studies submitted to the Board by the Licensee shall include an executive summary in English and Inuktitut.	<u>Executive summaries of the management plans submitted with the 2012 annual report remain outstanding.</u>	<u>LMI will submit revised management plans including executive summaries and translated executive summaries as part of its 2013 annual report.</u>	<u>By March 31, 2014</u>		
10	This Licence is assignable as provided in section 44 of the Act.	Compliant.				
11	The Licensee shall ensure that any document(s) or correspondence submitted by the Licensee to the Board is received and acknowledged by the Manager of Licensing.	Compliant.				

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12	The Licensee shall, for all Plans submitted under this Licence, include a proposed timetable for implementation. Plans submitted, cannot be undertaken without subsequent written Board approval and direction. The Board may alter or modify a Plan if necessary to achieve the legislative objectives and will notify the Licensee in writing of acceptance, rejection or alteration of the Plan.	The following plans were submitted to the Board for approval with the 2011 annual report: Spill Contingency Plan (H,1); Fuel Management Plan (2011 Inspection report); Interim Abandonment and Restoration Plan (I,1); and Care and Maintenance Plan (I,2).	LMI requests NWB approval of the submitted plans.	As per NWB review process	Ongoing implementation of Plans in accordance with NWB approval.	Upon receipt of NWB approval of Plans.
13	In the event that a Plan is not found acceptable to the Board, the Licensee shall provide a revised version to the Board for review within thirty (30) days of notification by the Board.					
14	The Licensee shall, for all Plans submitted under this Licence, implement the Plan as approved by the Board.	<u>These plans were updated and resubmitted to the Board for approval with the 2012 annual report.</u>				
15	Every Plan to be carried out pursuant to the terms and conditions of this Licence shall become a part of this Licence, and any additional terms and condition imposed upon approval of a Plan by the Board become part of this Licence. All terms and conditions of the Licence should be contemplated in the development of a Plan where appropriate.	Compliant.				
16	The Licensee shall review the Plans or Manuals referred to in this Licence as required by changes in operation and/or technology and modify the Plans or Manuals accordingly. Revisions to the Plans or Manuals are to be submitted in the form of an Addendum to be included with the Annual Report required by Part B, Item 2, complete with a revisions list detailing where significant content changes are made.	Compliant. <u>Addressed in Section 6 of 2012 Annual Report</u>				
17	The expiry or cancellation of this Licence does not relieve the Licensee from any obligation imposed by the Licence, or any other regulatory requirement.	Compliant.				

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PART C - CONDITIONS APPLYING TO SECURITY						
1	The Licensee shall furnish and maintain security with the Minister, in the amount of \$25.5 million dollars, in the form that is satisfactory to the Minister.	Compliant.				
2	The Licensee shall furnish and maintain such further or other amounts as may be required by the Board based on annual estimates of current mine reclamation liability.	NA Since issuance of the Licence renewal, the Board has not required any further or other amounts of security.				
3	The Licensee may submit to the Board for approval, a request for a reduction to the amount of security. The submission shall include supporting evidence to justify the request.	NA No requests for reduction in the amount of security have been requested.				
4	The security referred to in Part C, Item 1 shall be maintained until such time as it is fully or in part refunded by the Minister pursuant to section 76(5) of the Act. This clause shall survive the expiry of this Licence or renewals thereof and until full and final reclamation has been completed to the satisfaction of the Minister.	NA Since issuance of the Licence renewal, no part of security has been refunded by the Minister.				

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PART D - CONDITIONS APPLYING TO WATER USE						
1	The Licensee shall obtain all fresh Water for mining, milling and associated uses from Contwoyto Lake, at monitoring station LUP-01 using the Water Supply Facilities or as otherwise approved by the Board in writing.	<p>Compliant.</p> <p>2011 AANDC Inspection report noted that the water supply facility was not accessible for inspection and that fuel barrels marked WSC (Water Survey Canada) were located in the lake and on the shoreline. The inspector collected water samples from the shoreline adjacent to the intake pipe. Results of sample indicated aluminum concentration of 19 ug/L (slightly above CCME FWAL guideline of 5 ug/L for pH < 6.5) and pH of 6.45 (slightly below CCME FWAL guideline of between 6.5 and 9).</p> <p>2012 AANDC Inspection Report indicates that the water supply facility is acceptable, and no issues were reported.</p>	Barrels identified in 2011 AANDC Inspection were removed to a bermed area >30 m beyond the high water mark of Contwoyto Lake.	Completed early 2012	Maintain housekeeping procedures for third parties	Effective immediately

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2	The annual quantities of water withdrawn from Contwoyto Lake for all uses, shall not exceed 1,700,000 cubic metres.	<p>Compliant.</p> <p>2009 annual report indicates that a total of 123, 100 Litres (123.1 m3) of water was collected from Contwoyto Lake in 2009.</p> <p>2010 annual report indicates that a total of 272.13 m3 of water was collected from Contwoyto Lake in 2010.</p> <p>2011 annual report indicates that a total of 439.5 m3 of water was collected from Contwoyto Lake in 2011.</p> <p>2012 annual report indicates that a total of 1917.9 m3 of water was collected from Contwoyto Lake in 2012.</p>				
3	The Licensee shall equip the fresh water intake with a screen of an appropriate mesh size to ensure that fish are not entrained and shall withdraw water at a rate such that fish do not become impinged on the screen.	Compliant.				
4	The Licensee shall carry out weekly inspections of all water management structures during periods of flow and maintain records of the inspections and findings, for review upon the request of the Board.	<p>This Licence requirement has been incorporated into the Liquid Waste Management Plan, 2013 Section 5.1 and the Fuel Containment Management Strategy, 2013 Section 3.</p> <p>See compliance status of Part E Item 6 (f) regarding frequency of TCA inspection.</p>	Photos and miscellaneous inspection records and findings for 2012 <u>and 2013</u> to be consolidated	Ongoing	Ongoing implementation of Plans in accordance with NWB approval.	Immediately and as modified during NWB approval of Plans.
5	The Licensee shall implement measures to prevent the generation and deposition of dust and/or sediment into Water arising from road use.	<p>NA</p> <p>Road use is limited during care and maintenance.</p>				

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PART E- CONDITIONS APPLYING TO WASTE DISPOSAL						
1	The Licensee shall discharge all Tailings into the Tailings Containment Area, underground as Backfill or to other locations in accordance with the Guide to the Management of Tailings Facilities (Mining Association of Canada September 1998), or as otherwise approved by the Board in writing.	NA No tailings have been generated or discharged during the term of the Licence renewal.				
2	The discharge from the Tailings Containment Area at Monitoring Station LUP-10 shall commence no sooner than July 15 of any calendar year unless otherwise approved by the Board in writing.	Compliant. <u>Licence requirement is incorporated into section 5.2.2 of Liquid Waste Management Plan, 2013 submitted with 2012 annual report.</u> Discharge occurrence in 2009 and 2012. <u>No discharge in 2010, 2011, or 2013.</u>				
3	The discharge rate from the Tailings Containment Area shall not exceed 70,000 cubic metres per day, unless otherwise approved by the Board in writing.	Compliant <u>Licence requirement is incorporated into section 5.2.2 of Liquid Waste Management Plan, 2013 submitted with 2012 annual report.</u>				

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4		The Licensee shall provide at least ten (10) days notice to the Inspector prior to any planned Discharge from any facilities. The notice shall include an estimated volume proposed for Discharge and the receiving location.	Notification provided prior to discharge from LUP-10 in 2009 (dated Aug 24, 2009) Notification provided prior to discharge from LUP-14 in 2009 (dated Aug 11, 2009) Notification prior to discharge from LUP-27 in June 2010 missed. Notification prior to discharge of effluent from LUP-14 between Sept 23 and Oct 10, 2011 and from LUP-27 Sept 20 to 23, 2011 was missed. Inspector was not provided the analytical results prior to discharge.	2011 unauthorized discharge events were reported in the October 2011 monthly report. All effluent was tested to determine that it met the discharge limits prior to and during discharge. 2012 unauthorized discharge reported immediately upon discovery. Also see June monthly monitoring report for water sampling results. Water licence effluent quality limits were not exceeded.	Completed	Incorporate licence requirement into operational plan: <u>Liquid Waste and Stormwater Management Plan (Care and Maintenance)</u> March 2012 and <u>Fuel Containment Management Strategy (Care and Maintenance)</u> , 2012	LMI submitted updated copies of operational plans as part of 2012 annual report
			Notification provided prior to discharge from LUP-27 in 2012 (June 8, 2012) Notification provided prior to discharge from LUP-10 in 2012 (dated Aug 27, 2012) Notification not provided prior to discharge from LUP-14 in 2012. Verbal notification provided immediately upon discovery of unauthorized discharge on June 2, 2012 followed by written notification on June 15, 2012. <u>Notification provided prior to discharge from LUP-27 in 2013 (dated June 4, 2013)</u>	Incorporate requirement into operational plan <u>Discharge Procedure: Tailing Containment Area and Sewage Lakes Disposal Facility (Care and Maintenance)</u> , March 2012		Maintain copies of operational plans on-site and review plans during orientation of new site management staff.	

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5		All Effluent discharged from the Tailings Containment Area shall not exceed the following effluent quality limits at Monitoring Program station LUP-10:	Compliant. Effluent discharged from LUP-10 from August 25, 2009 until the end of September, 2009. Effluent discharged from LUP-10 from September 8, 2012 until September 29, 2012. <u>No effluent was discharged from LUP-10 in 2013.</u>																																		
		<table><tr><th>Parameter</th><th>Max Avg Concentration (mg/L)</th><th>Concentration of any Grab Sample (mg/L)</th></tr><tr><td>Total Arsenic</td><td>0.50</td><td>1.00</td></tr><tr><td>Total Copper</td><td>0.15</td><td>0.30</td></tr><tr><td>Total Cyanide</td><td>0.80</td><td>1.60</td></tr><tr><td>Total Lead</td><td>0.10</td><td>0.20</td></tr><tr><td>Total Nickel</td><td>0.20</td><td>0.40</td></tr><tr><td>Total Zinc</td><td>0.40</td><td>0.80</td></tr><tr><td>TSS</td><td>15</td><td>30</td></tr><tr><td>Oil and Grease</td><td>Visual Sheen</td><td></td></tr><tr><td colspan="3">The Waste discharged shall have a pH between 6.0 and 9.5</td></tr></table>						Parameter	Max Avg Concentration (mg/L)	Concentration of any Grab Sample (mg/L)	Total Arsenic	0.50	1.00	Total Copper	0.15	0.30	Total Cyanide	0.80	1.60	Total Lead	0.10	0.20	Total Nickel	0.20	0.40	Total Zinc	0.40	0.80	TSS	15	30	Oil and Grease	Visual Sheen		The Waste discharged shall have a pH between 6.0 and 9.5		
		Parameter						Max Avg Concentration (mg/L)	Concentration of any Grab Sample (mg/L)																												
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The Waste discharged shall have a pH between 6.0 and 9.5																																					

		The Tailings Containment Area shall be constructed, operated and maintained to engineering standards such that:	See sub-items (a) - (g)				
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a	A freeboard limit of 1.0 metre shall be maintained at all times or as recommended by a Geotechnical Engineer and as approved by the Board in writing;	<p>2011 AANDC inspection report noted high water levels at Dam J and insufficient freeboard. Inspector required Elgin to undertake such measures as are required to address high water levels at Dam J within sixty (60) days of receipt of the inspection report.</p> <p>2012 AANDC inspection report noted freeboard as "Acceptable".</p> <p>2009 to 2012 Geotechnical Inspection reports note freeboard greater than 1 m on all perimeter dams. 2012 Geotechnical Inspection report notes freeboard less than 1 m on some internal dams.</p> <p><u>2013 Geotechnical Inspection report notes freeboards on perimeter dams range from 2.5 to 4 m, and freeboard on internal dams range from 1 to 5 m.</u></p>	<p>Work carried out in 2012 to address condition included:</p> <p>Treating and discharging water during and since the 2012 site inspections. Pond 1 and 2 water levels have been reduced.</p>	Completed	Continue to monitor freeboard and treat and discharge water as required.	<p>Monitoring to continue on an on-going bases.</p> <p>Treatment and discharge of water as needed.</p>

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b	Seepage from the Tailings Containment Area is minimized;	<p>2011 and 2012_ AANDC Inspection reports did not note any seepages.</p> <p>2009 Annual Geotechnical Inspection of Perimeter Dams noted seepage at toe of Dam 4.</p> <p>2010 Annual Geotechnical Inspection of Perimeter Dams noted a small seepage zone at Dam 2.</p> <p>2011 Annual Geotechnical Inspection of Perimeter Dams noted seepage at Dam 2 and possible seepage at Dam 6.</p> <p>No major seepage from the TCA was observed during the 2012 <u>or 2013</u> Annual Geotechnical Inspections.</p>	<p>Measures to address seepage issues noted along Dam 4 in 2009 were carried out in 2010. In 2011 it was observed that erosion gullies and loose fill had been placed between the dam and coffer dam for seepage control at Dam 4.</p> <p>Measures carried out in 2012 to address seepage issues at Dam 2 included establishment of coffer dam to collect seepage.</p>	Completed	<p>Dam 2: Surface maintenance. Monitoring regularly to pump any collected seepage back into Pond 2.</p> <p>Dam 6: Monitor regularly for potential seepage.</p> <p>All Dams: Regular monitoring</p>	<p>Monitoring to commence immediately and continue on an on-going basis.</p> <p>Surface maintenance and repairs to continue <u>as needed</u>.</p>

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c	Any Seepage that occurs is collected and returned immediately to the Tailings Containment Area;		<p>2011 AANDC inspection report notes evidence of standing/ponded water. 2009 geotechnical inspection report recommended returning seepage from Dam 4 back to TCA.</p> <p>2010 and 2011 geotechnical inspection reports both recommend returning seepage from Dam 2 back to TCA upon confirmation sampling.</p> <p><u>2012 geotechnical inspection report recommended re-establishment of coffer dam to collect seepage and pumping collected seepage back to TCA.</u></p> <p><u>2013 geotechnical inspection report notes that seepage collection pond is almost full and recommends pumping seepage back to TCA.</u></p>	Measures carried out in 2012 included placement of a coffer dam at the toe of Dam 2 to collect the seepage to be pumped back into Pond 2 when it is pooled.	Completed	<p>Dam 2: Monitor regularly to pump the collected seepage back into Pond 2.</p> <p>All Dams: Monitor regularly</p>	Monitoring to commence immediately and continue on an on-going basis.

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6	d	Erosion of constructed facilities is addressed immediately;	<p>2009 to 2011 geotechnical inspection reports note minor erosion issues, worsening along downstream slopes in 2010.</p> <p>2011 AANDC inspection report notes erosion and sloughing of the sides of Dam J.</p> <p>2012 AANDC inspection report notes erosion of road at Dam 6.</p> <p>2012 geotechnical inspection report notes minor erosion issues with perimeter dams with more serious erosion at Dam 1A. A breach in "storm ditch" constructed on crest of Dam 3 was also noted. Internal dams noted in good condition with the exception of Dams M and L.</p>	<p>Measures carried out in 2012 included:</p> <p>Dam 3: Breach repaired</p> <p>Dam M: Avoidance of vehicle traffic on eroded section and monitoring regularly to determine if cracking is progressing.</p> <p><u>Dams M and L: conducted risk assessment to determine: (1) consequences in terms of water quality of uncontrolled drainage flowing from cell 3 to cell 4, assuming integrity of Dam L stays intact; and (2) potential failure of Dam M. Risk assessment was submitted as part of 2012 annual report.</u></p>	Completed	<p><u>(1) Surface maintenance, repair, erosion protection, and regular monitoring as needed on all dams.</u></p> <p><u>(2) 2013 risk assessment recommends the following measures to address Dam M:</u></p> <ul style="list-style-type: none"> - prevent driving on dam crest - draw down water level in cell 5 by controlled discharge to pond 1 - repair cracks - monitor water levels in pond 2 and cell 5 - monitor water quality in cell 5 including one sample at depth - update estimate of existing storage capacity of cell 5 and current volume of water stored in the cell - longer term planning to re-inforce downstream slope of Dam M - closure and abandonment planning for cell 5 	<p><u>(1) General dam maintenance and repair on an ongoing basis.</u></p> <p><u>(2) Dam M:</u></p> <ul style="list-style-type: none"> -prevent driving on dam crest immediately -draw down water levels in cell 5 in 2014 -monitoring and repair as recommended in risk assessment in 2014 -update estimate of existing storage capacity of cell 5 in 2014 -update management plans to address risk assessment in 2014

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e		<p><u>2013 geotechnical inspection report notes minor erosion issues with perimeter dams with more serious erosion at Dam 1A. Internal dams were noted in good condition with the exception of Dams M and L.</u></p> <p><u>A June 19, 2013 LMI inspection noted that the roadway located adjacent to Boomerage Lake had eroded as a result of runoff.</u></p>	<p><u>Measures carried out in 2013 included:</u></p> <p><u>Dam 3: Erosion damage in roadway adjacent to Boomerang Lake repaired.</u></p> <p><u>Boomerage Lake roadway repaired</u></p>		<p><u>(3) 2013 risk assessment recommends the following measures to address Dam L</u></p> <ul style="list-style-type: none"> <u>- verify water quality in cell 3 and 4</u> <u>- surface maintenance</u> <u>- monitoring to ensure dam toe is not undercut</u> <u>- repair breached section with well compacted esker material</u> <u>- monitor and manage water in cell 3 to prevent overflow</u> <u>- evaluate measures to permit drainage from cell 3 to cell 4 without threatening integrity of dam</u> 	<p><u>(3) Dam L:</u></p> <ul style="list-style-type: none"> <u>- verify water quality in cells 3 and 4 in 2014</u> <u>- monitoring and repair as recommended in risk assessment in 2014</u> <u>- monitor and manage water in cell 3 to prevent overflow in 2014</u> <u>- evaluate measures to permit drainage from cell 3 to cell 4 without threatening integrity of dam in 2014</u> <u>- update management plans to address risk assessment in 2014</u>
	The solids fraction of the mill Tailings shall be permanently contained within the Tailings Containment Area or underground as Backfill;	<p>2011 AANDC inspection report noted that sections within the tailings area had low water levels and approx. 5-10 hectares of exposed tailings. Inspector required LMI to undertake such measures as are required to address the exposed tailings in the pond southeast of Dam J (Cell 3) within sixty (60) days of receipt of the inspection form.</p> <p>2012 AANDC inspection report noted thin to absent tailings cover as well as windblown tailings at Dam 6 (Cell 3). Samples from the toe of Dam 6 indicate elevated concentrations of arsenic.</p> <p>Annual Geotechnical Inspections have not addressed tailings cover.</p>	<p><u>Care and Maintenance Plan section 4.3 has been revised to propose measures to address windblown tailings.</u></p>	<p><u>Submitted as part of 2012 annual report.</u></p>	<p><u>Update geotechnical, geochemical, and water balance assessments to address operational issues with TCA, including tailings cover.</u></p> <p><u>Based on the results of the geochemical, geotechnical and water balance assessments, update the Interim Abandonment and Restoration Plan to minimize risks and determine options for reactivation of the TCA should a decision be made to take the mine off care and maintenance and into production.</u></p>	<p><u>Prior to recommending mine operations</u></p>

PLAN FOR COMPLIANCE
2AM-LUP0914

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Licence Condition		Status of Compliance	Short Term Plan for Compliance	Schedule for Implementation of Short Term Plan for Compliance	Long Term Plan for Compliance	Schedule for Implementation of Long Term Plan for Compliance
f	Weekly inspections of the dam(s), Tailings line(s), and catchment basin(s) shall be carried out and records of these inspections shall be kept for review upon the request of an Inspector, or as otherwise approved by the Board. More frequent inspections shall be performed at the request of an Inspector; and	<p>With respect to the required weekly inspections, LMI has not carried out formal inspections, however when water is transferred from one area to another, a general observation is made to determine any anomalies (e.g. crew working at the tailings pond will conduct a general assessment of conditions along the dams as the water level is being lowered). LMI has not carried out inspections on the catchment basins and the tailings line. The tailings line is not in use during care and maintenance and therefore has not been inspected.</p> <p><u>2013 Geotechnical Inspection report recommends the following revisions to the inspection schedule:</u></p> <ul style="list-style-type: none"> <u>· May to June (fresnet) – bi-weekly</u> <u>· July to October (open water) – monthly.</u> 	<p>(1) Request Board approval to revise inspection schedule as recommended in annual Geotechnical Inspection reports.</p> <p>(2) Photos and miscellaneous inspection records and findings for 2012 and 2013 to be consolidated</p>	<p>(1) <u>Requested as part of this water licence renewal application and subject to NWB review process.</u></p> <p>(2) <u>Consolidation of photos and inspection records to be provided as part of 2013 annual report due by March 31, 2014.</u></p>	<p>(3) Implement reduced frequency of inspection.</p> <p>(4) Update Care and Maintenance Plan to include revised inspection schedule and record keeping</p>	<p>(3) Implement revised inspection schedule upon NWB approval.</p> <p>(4) <u>Update Care and Maintenance Plan upon NWB approval.</u></p>
g	An inspection of the Tailings Containment Area shall be carried out annually during ice free, open water conditions by a Geotechnical Engineer. The Engineer's report shall be submitted to the Board within sixty (60) days following the inspection, and shall include a covering letter from the Licensee outlining an implementation plan to respond to the Engineer's recommendations.	<p>Compliant.</p> <p>Annual Geotechnical inspection reports and cover letters were submitted for 2009, 2010 and 2011 of the TCA perimeter dams.</p>				
7	The Licensee shall discharge all Sewage to the Sewage Lakes Disposal Facilities or as otherwise approved by the Board in writing.	Compliant.				

PLAN FOR COMPLIANCE
2AM-LUP0914

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Licence Condition			Status of Compliance	Short Term Plan for Compliance	Schedule for Implementation of Short Term Plan for Compliance	Long Term Plan for Compliance	Schedule for Implementation of Long Term Plan for Compliance																										
8		All Effluent discharged from the Sewage Lakes Disposal Facilities shall not exceed the following effluent quality limits at Monitoring Program monitoring station LUP-14:	Compliant. Effluent was discharged from LUP-14 from August 11, 2009 to September 24, 2009. Effluent was discharged from LUP-14 from September 23, 2011 to October 10, 2011. Effluent was discharged from LUP-14 from June 30, 2012 until July 27, 2012. <u>There are no recorded discharged from LUP-14 in 2013.</u>																														
		<table><tr><th>Parameter</th><th>Concentration of any Grab Sample (mg/L)</th></tr><tr><td>Total Arsenic</td><td>0.05</td></tr><tr><td>Total Copper</td><td>0.20</td></tr><tr><td>Total Lead</td><td>0.05</td></tr><tr><td>Total Nickel</td><td>0.30</td></tr><tr><td>Total Zinc</td><td>0.50</td></tr><tr><td>TSS</td><td>35</td></tr><tr><td>BOD5</td><td>30</td></tr><tr><td>Faecal Coliforms</td><td>1000 colony forming units / 100 mL</td></tr><tr><td>Oil and Grease</td><td>Visual Sheen</td></tr><tr><td>pH</td><td>6.0 to 9.5</td></tr></table>	Parameter	Concentration of any Grab Sample (mg/L)	Total Arsenic	0.05	Total Copper	0.20	Total Lead	0.05	Total Nickel	0.30	Total Zinc	0.50	TSS	35	BOD5	30	Faecal Coliforms	1000 colony forming units / 100 mL	Oil and Grease	Visual Sheen	pH	6.0 to 9.5									
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pH	6.0 to 9.5																																
9		All Effluent discharged from the Bulk Fuel Storage Facility at Monitoring Program station LUP-27 shall not exceed the following effluent quality limits	Compliant. Effluent was discharged from LUP-27 on June 10, 2010. Effluent was discharged from LUP-27 on September 20 and 23, 2011. Effluent was discharged from LUP-27 on June 23, 2012. <u>Effluent was discharged from LUP-27 June 18-20, 2013.</u>																														
		<table><tr><th>Parameters</th><th>Max Avg Concentration (mg/L)</th><th>Max Concentration Grab Sample (mg/L)</th></tr><tr><td>pH</td><td>6-9</td><td></td></tr><tr><td>TSS</td><td>15</td><td>30</td></tr><tr><td>Total Oil and Grease</td><td>5 and no visible sheen</td><td>10</td></tr><tr><td>Total Ammonia</td><td>2.0</td><td>4.0</td></tr><tr><td>Total Lead</td><td>0.01</td><td>0.02</td></tr><tr><td>Benzene</td><td>0.37</td><td>-</td></tr><tr><td>Toluene</td><td>0.002</td><td>-</td></tr><tr><td>Ethyl Benzene</td><td>0.090</td><td>-</td></tr></table>	Parameters	Max Avg Concentration (mg/L)	Max Concentration Grab Sample (mg/L)	pH	6-9		TSS	15	30	Total Oil and Grease	5 and no visible sheen	10	Total Ammonia	2.0	4.0	Total Lead	0.01	0.02	Benzene	0.37	-	Toluene	0.002	-	Ethyl Benzene	0.090	-				
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Ethyl Benzene	0.090	-																															
10		The Licensee shall confirm compliance with Effluent quality limits in Part E, Items 5, 8 and 9 prior to Discharge.	Compliant.																														
11		The Licensee shall Discharge all Minewater to the Tailings Containment Area or to the Sewage Lakes Disposal Facilities, except as specified in Part E, Item 12.	NA No minewater discharged during term of renewal Licence.																														

PLAN FOR COMPLIANCE
2AM-LUP0914

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12	The Licensee shall submit to the Board for approval, a proposal for the disposal of Minewater should a location other than those specified in Part E, Item 11 be considered. The proposal shall describe options for the Discharge of Minewater, data on the quantity and quality of the Minewater, and the options for Minewater treatment and disposal.	NA No alternate minewater disposal has been proposed.				
13	The proposal specified in Part E, Item 12, shall be implemented as approved by the Board in writing.	NA.				
14	The Licensee shall remove from the project site, all hazardous Wastes generated through the course of the Operation, for disposal at an approved hazardous waste disposal facility.	2011 AANDC inspection report noted waste oil and barrels within the secondary containment area south of the main tank farm. 2012 AANDC inspection report notes open barrels and contamination in hazardous waste storage area. It also notes buried drums in the burn pit berm walls and exposed metal debris in the landfill.	In response to the 2011 AANDC inspection report, it is noted that the secondary containment area south of the main tank farm is for the purpose of lubricant oil storage. In response to the 2012 AANDC inspection report all open barrels were removed from site during the 2012 field season. Any contamination will remain contained within the industrial site and will be monitored for seepage. Also see status of compliance under Part H Item 3.	A program to routinely remove unusable fuels and lubricant to approved off-site hazardous waste disposal facilities was implemented in 2012. Seepage monitoring will continue during 2013 field season and will be ongoing.	Manage hazardous wastes in accordance with Board approved Waste Management Plan <u>dated March 2013</u> . Legacy contamination issues will be addressed as part of the Final Abandonment and Restoration Plan.	Upon approval of Plans by the Board.
15	The Licensee shall maintain records of all Waste backhauled and confirmation of proper disposal through the use of Waste manifest tracking systems and registration with the Government of Nunavut, Department of Environment.	Compliant.				

PLAN FOR COMPLIANCE
2AM-LUP0914

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PART F - CONDITIONS APPLYING TO MODIFICATIONS						
1		NA No modifications have been carried out during the term of the Licence renewal.				
	a					
	b					
	c					
	d					
	e					
2						
3						
	a					
	b					
	c					
	d					
	e					
	f					
4						

PLAN FOR COMPLIANCE
2AM-LUP0914

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PART G - CONDITIONS APPLYING TO CONSTRUCTION						
1	All new final design and construction drawings, submitted as required by Licence 2AMLUP0914, shall be stamped and signed by a Professional Engineer.	<p>NA</p> <p>No facilities have been designed or constructed during the term of the Licence renewal.</p> <p>The only earthworks conducted include maintenance work recommended by the Geotechnical Engineer.</p>				
2	Prior to construction of any dams, dykes or structures intended to contain withhold, divert or retain water or wastes other than as contemplated in the Contingency Plan, the Licensee shall submit to the Board, for approval, final design and construction drawings signed and stamped by an Engineer.					
3	As-built drawings of the dams, dykes or structures shall be stamped by a Geotechnical Engineer and submitted to the Board within ninety (90) days of completion of the structures.					
4	The construction of engineered earthworks shall be supervised and field checked by a qualified Engineer. Construction records shall be maintained and made available at the request of the Board.					
5	The Licensee shall submit a Construction Summary Report to the Board for review, within ninety (90) days following the completion of all new structures designed to contain, withhold, divert or retain Waters or Wastes. The Construction Summary Report shall be prepared by a qualified Engineer(s) in accordance with Schedule G, Item 1.					
6	The Licensee shall use fill material for construction from an approved source, which has been demonstrated not to produce Acid Rock Drainage and to be non-Metal Leaching.	<p>NA</p> <p>No fill required for construction during term of Licence renewal.</p>				

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2AM-LUP0914

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7	The Licensee shall implement sediment and erosion control measures prior to and during Construction, and Operations where necessary, to prevent entry of sediment into Water.	Compliant. Conditions also considered in Care and Maintenance Plan, March 2013 (submitted to the NWB as part of 2012 annual report)				
8	The Licensee shall inspect daily, all construction activities for signs of erosion.					
9	The Licensee shall minimize disturbance to terrain, permafrost and drainage during movement of the Licensee's and its contractor's equipment and personnel around the site during construction activities.					
10	The Licensee shall not store material on the surface of frozen streams or lakes except what is for immediate use.					
11	The Licensee shall locate new equipment storage areas on gravel, sand or other durable land, a distance of at least thirty (30) metres above the ordinary high Water mark of any Water body in order to minimize impacts on surface drainage and Water quality.					
12	The Licensee shall undertake necessary corrective measures to mitigate impacts on surface drainage resulting from the Licensee's activities.					
13	The Licensee shall limit any in-stream activity to low Water periods. In-stream activity is prohibited during fish migration.	NA. No in-stream activities have been conducted during open water				
14	For the purposes of culvert and bridge installations, the Licensee shall not encroach on the natural channel width by the placement of abutments, footings or armoring below the ordinary high Water mark of any water body.	NA. No culverts or bridges have been installed during the term of this Licence renewal.				

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2AM-LUP0914

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PART H - CONDITIONS APPLYING TO EMERGENCY RESPONSE AND CONTINGENCY PLANNING						
1	Schedule H, Item 1	Compliant. See updated and revised Spill Contingency Plan dated March 2013, submitted with 2012 annual report.				
	The Licensee shall submit to the Board for approval, no later than thirty (30) days following approval of the Licence by the Minister, an updated "Spill Contingency Plan, Lupin Operations". The Spill Contingency Plan shall be prepared in accordance with Schedule H, Item 1.					
	The Contingency Plan referred to in Part H, Item 1 shall be a revised version of the Plan "Spill Contingency Plan, Lupin Operations" submitted with the application, prepared following GN-DOE's Spill Contingency Planning and Reporting Regulations, and Contingency Planning and Spill Reporting in Nunavut: a Guide to the New Regulations, and include:					
	a A site 24 hour per day contact number;					
	b A description on how to manage large quantities of oil-soaked snow;					
	c Detailed information on spill response measures under the Training and Exercises section;					
	d Provide new contact information as submitted by parties during the written hearing process;					
	e Include Part 2 of the Spill Report form that discusses the instructions for completing and submitting the Report;					
	f Provide updated, detailed topographical maps showing all facilities and their relationship to surrounding water bodies;					
2	g More clarity on the quantities and locations of Jet A and Jet B fuel on site (currently under the same line item in Table 1, Appendix III;	Compliant.				
	h information on the proper storage of all hazardous materials including types, volumes and location;					
	The Licensee shall keep a copy of the Spill Contingency Plan at each site of operation.					

PLAN FOR COMPLIANCE
2AM-LUP0914

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3	The Licensee shall prevent any chemicals, fuel or wastes associated with the undertaking from entering any Water body.	<p>LMI has implemented prevention measures as outlined in its Care and Maintenance Plan, 2012, <u>and updated in 2013.</u></p> <p>2012 AANDC inspection report noted a salt spill in the burn pit as well as other legacy hazards and contamination issues that need to be addressed through a risk assessment.</p>	<p>Salt spill identified during 2012 AANDC inspection was cleaned up.</p> <p>Provide an addendum to Lupin Environmental Site Assessment dated 2006 to address AANDC's request for a risk assessment of legacy hazards and contamination issues. This assessment will prioritize risks to the receiving environment; determine the mechanisms that could cause contamination to leave the site footprint; assess whether or not contamination is present or occurring; and determine mitigation measures to prevent further contamination.</p>	<p><u>ESA addendum to be conducted prior to recommencing mine operations.</u></p> <p>Updated Care and Maintenance Plan dated March, 2013 was submitted as part of 2012 Annual Report.</p>	<p><u>(1) Update the Care and Maintenance Plan to include mitigation measures identified in the Environmental Site Assessment.</u></p> <p>(2) Identify mitigation measures to be addressed in the Final Abandonment and Restoration Plan</p>	<p>(1) <u>Prior to recommencing mine operations.</u></p> <p>(2) Final Abandonment and Restoration Plan will be submitted in accordance with Part I Item 5.</p>

PLAN FOR COMPLIANCE
2AM-LUP0914

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4		The Licensee shall provide secondary containment for fuel and chemical storage as required by applicable standards and acceptable industry practice.	2012 AANDC inspection report notes that where liners are present, they are exposed, punctured, and generally suspect. Report also notes that satellite tank farm obviously overtopped and released contamination.	<p>In 2012 LMI maintained all secondary containment areas dry and free of debris; disposed of accumulated water; completed inspections; and installed temporary secondary containment at fuel dispensing area.</p> <p>Replacement of active individual day tanks has been initiated and is ongoing.</p> <p>Secondary containment areas were assessed by Engineer and remedial work plan developed.</p>	Remedial Work Plan is outlined in Fuel Containment Management Strategy submitted as part of 2012 Annual Report.	Carry out Remedial Work outlined in Fuel Containment Management Strategy, March 2013	2013 to 2015
5		Licensee shall operate the Bulk Fuel Storage Facilities in accordance with all applicable legislation, guidelines and practices, including:	2011 AANDC inspection report notes that the Bulk Fuel Storage Facilities did not appear to be registered. The tanks in the Bulk Fuel Storage Facilities were registered at that time, but no placards were in place to identify them as being so. On July 25, 2013 Environment Canada Enforcement Officer conducted a site inspection, and subsequently issued an Environmental Protection Compliance Order on December 6, 2013 requiring a number of measures to be carried out on or by June 3, 2014.	In 2011 LMI undertook repairs and maintenance of the Bulk Fuel Storage Facilities to ensure the safety of the fuel system over winter. In 2012 placards identifying the registered tanks were erected. A plan to update the Bulk Fuel Storage Facilities is currently being developed by a third party engineer.	Fuel Containment Management Strategy including Remedial Work was submitted as part of the 2012 annual report.	(1) Carry out Remedial Work outlined in Fuel Containment Management Strategy, March 2013. (2) Undertake measures required by Environment Canada Compliance Order.	(1) 2013 to 2015 (2) By June 3, 2014
	a	Environmental Code of Practice for Aboveground and Underground Storage Tank Systems Containing Petroleum and Allied Petroleum Products, 2003; CCME;					
	b	National Fire Code, 1995, and					
	c	Storage Tank Systems for Petroleum Products and Allied Petroleum Products Regulations, SOR/2008-197, June 12, 2008.					
6		The Licensee shall perform, at a minimum, weekly inspections of fuel containment facilities for leaks and settlement and shall keep a written log of inspections to be made available to an Inspector upon request, or as otherwise approved by the Board in writing.	Requirement has been incorporated into Fuel Containment Management Strategy, 2013	Photos and miscellaneous inspection records and findings for 2012 to be consolidated into readily accessible files.	Ongoing	Ongoing implementation of Plans in accordance with NWB approval.	Immediately and as modified during NWB approval of Plans.

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2AM-LUP0914

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7	The Licensee shall conduct emergency maintenance and servicing on equipment, in designated areas, and shall implement measures to collect motor fluids and other Waste and prevent and contain spills.	Compliant.				
8	If, during the term of this licence, an unauthorized Discharge of Waste and or Effluent occurs, or if such a discharge is foreseeable, the Licensee shall:	Compliant.				
	a Employ as required, the contingency Plan referred to in Part H, Item 1;	Licence requirement is incorporated into Spill Contingency Plan, <u>2013</u> .				
	b Report the incident immediately via the 24-Hour Spill Reporting Line at (867) 920-8130 and to the Inspector at (867) 975-4295; and	As noted in the 2011 annual report, there was an unauthorized discharge of effluent from LUP-14 (Sewage Lakes Disposal Facility) and an unauthorized discharge of from LUP-27 (Bulk Fuel Storage Facility). These events were reported in the October monthly report to the NWB. All effluent was tested to determine that it met the discharge limits prior to and during discharge, however the Inspector was not provided the analytical results prior to discharge.				
	c For each spill occurrence, submit a detailed report to the Inspector, no later than thirty (30) days after initially reporting the event, which includes the amount and type of spilled product, the GPS location of the spill, and the measures taken to contain, clean up and restore the spill site.	As noted in July 2012 monthly monitoring report an unauthorized discharge occurred from LUP-14 on June 2, 2012. Spill report was submitted with July monthly monitoring report.				

PLAN FOR COMPLIANCE
2AM-LUP0914

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PART I - CONDITIONS APPLYING TO ABANDONMENT, RECLAMATION AND CLOSURE PLANNING						
1		<p>The Licensee shall, no later than thirty (30) days following approval of the Licence by the Minister, submit to the Board for approval, an updated Interim Abandonment, Reclamation and Closure Plan, prepared in accordance with Schedule I, Item 1.</p>	<p>Compliant.</p> <p>See updated and revised Interim Abandonment and Restoration Plan dated March 2012, submitted with 2011 annual report.</p> <p>LMI submitted another revision of this Plan to the NWB as part of the 2012 annual report incorporating the following references:</p> <p>Report by I. Holubec, Holubec Consulting Inc, Geotechnical Seepage and Water Balance, Volume I of Seepage and Water Quality for Reclaimed Tailings Containment Area Lupin Operation, dated March 2006;</p> <p>Report by I. Holubec, Holubec Consulting Inc, Water Management After Closure, Volume II of Seepage and Water Quality for Reclaimed Tailings Containment Area Lupin Operation, dated March 2006;</p> <p>Report by FcoMetrix</p>			
	Schedule 1, Item 1	The Interim Abandonment, Reclamation and Closure Plan referred to in Part I, Item 1 shall be prepared in accordance with the Mine Site Reclamation Guidelines for the Northwest Territories, 2007 and consistent with the INAC Mine Site Reclamation Policy for Nunavut, 2002. The Plan shall include the following:				
	a	Disposal information for unsold accommodation facilities;				
	b	Disposal of contaminated soils;				
	c	Inspections for fuel/oil spills and inspections of fuel containment facilities;				
	d	Information on the geotechnical requirements, slope and the placement of rip rap along the downstream side of Dam 4;				
	e	Detailed drawings, activities, construction schedules and techniques for the breakwater and causeway; and				

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2AM-LUP0914

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f	Justification for not proceeding to full reclamation under Part I, Item 5.	<p><u>Report by Environment Canada</u></p> <p>Incorporated, Geochemistry and Water Quality, Volume III of Seepage and Water Quality for Reclaimed Tailings Containment Area Lupin Operation, dated March 2006; and</p> <p>Correspondence leading up to and following April 2006 Technical Meeting to Discuss Lupin TCA A&R Plan including comments from EC, DFO, GN-DOE, and INAC.</p>				

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2AM-LUP0914

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2		Compliant. See updated and revised Care and Maintenance Plan dated March 2012, submitted with 2011 annual report.				
	Schedule I, Item 2					
	a					
	b					
	c					
	d					
3	e	In 2011, LMI had limited snow-free time during which to access the site and complete the reclamation liability estimate.	Under review	LMI <u>submitted</u> an updated estimate with the 2012 Annual Report to the NWB.	Under review	LMI will submit updated estimates with annual reports as required by Part B Item 2 (m)
	f					
4		NA. The site is currently in care and maintenance.				

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2AM-LUP0914

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5		NA. The site is currently in care and maintenance.				
	Schedule 1, Item 3					
	a					
	b					
	c					
	d					
	e					
	f					
	g					
	h					
	i					
	j					
6		Compliant.				

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7	The Licensee shall notify the Board in writing, as soon as is practically possible, of any change in the status of the mine operations. This notice shall include a summary of Plans and a Schedule for anticipated activities related to the Care and Maintenance or the Final Closure of the Mine and associated infrastructure.	Compliant. <u>The site has remained in care and maintenance since 2005.</u>				
8	The Licensee shall notify the Board in writing, at least sixty (60) days prior to recommencement of the mining and milling undertaking on site. This notice shall include a summary of Plans and a Schedule for anticipated activities related to the change in status.	NA. LMI has not recommenced mining and milling operations.				
9	Notwithstanding the time schedule referred to in the Abandonment, Reclamation and Closure Plan, the Licensee shall implement Progressive Reclamation, including progressive covering of the tailings and revegetation, as soon as is realistically possible.	LMI has outlined planned reclamation activities in its Interim Abandonment and Reclamation Plan, March <u>2013</u>				

PLAN FOR COMPLIANCE
2AM-LUP0914

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Licence Condition		Status of Compliance	Short Term Plan for Compliance	Schedule for Implementation of Short Term Plan for Compliance	Long Term Plan for Compliance	Schedule for Implementation of Long Term Plan for Compliance
PART J - CONDITIONS APPLYING TO MONITORING						
1	The Licensee shall carry out the Monitoring Program as per Table 1 of Schedule J.	<p>Generally compliant. Missed monitoring events include (as per annual reports):</p> <ul style="list-style-type: none"> -2009 LUP-10 daily quantities of treated effluent measured and recorded in cubic meters; -2009 LUP-10 24 ICP-MS on first day of discharge and monthly thereafter; -2009 LUP-10 Static Pass/Fail Bioassay (not required by Inspector in email dated Sept 2, 2009); -2009 LUP-14 cadmium results; -2011 LUP-14 sample results are from 4th day of discharge, not first day of discharge as required; 				
		<ul style="list-style-type: none"> - 2012 LUP-10 <u>weekly samples missed Ra226 analyses</u> - 2012 LUP-20,21,22,24,25 <u>weekly Sept 12 samples missed nutrient analyses</u> - 2012 LUP-22,24,25,27 <u>sampling frequency does not comply</u> 				

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Licence Condition		Status of Compliance	Short Term Plan for Compliance	Schedule for Implementation of Short Term Plan for Compliance	Long Term Plan for Compliance	Schedule for Implementation of Long Term Plan for Compliance
2	The Licensee shall provide the GPS co-ordinates, in degrees, minutes and seconds of latitude and longitude, of all locations where sources of water are utilized for all purposes.	Compliant. Provided in Water Quality Monitoring Plan and Quality Assurance/ Quality Control Plan, March 2013.				
3	The Licensee shall determine the GPS co-ordinates, in degrees, minutes and seconds of latitude and longitude, of all locations where wastes associated with camp operations and drilling operations are deposited.	Compliant. Provided in Water Quality Monitoring Plan and Quality Assurance/ Quality Control Plan, March 2013. Drilling operation GPS coordinates were provided in the 2012 annual report for 2BE-LEP1217.				
4	The quantity of ore milled shall be measured in tonnes and recorded monthly. The total volume and the solids/solution ratio of waste discharged to the Tailings Containment Area and underground disposal as paste Backfill shall be recorded monthly.	NA. Ore has not been milled during the term of the Licence renewal.				

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2AM-LUP0914

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Licence Condition		Status of Compliance	Short Term Plan for Compliance	Schedule for Implementation of Short Term Plan for Compliance	Long Term Plan for Compliance	Schedule for Implementation of Long Term Plan for Compliance
5	All sampling, sample preservation and analyses shall be conducted in accordance with methods prescribed in the current edition of Standard Methods for the Examination of Water and Wastewater, or by such other methods approved by the Board in writing.	Compliant.				
6	All analyses shall be performed in a laboratory accredited according to ISO/IEC Standard 17025. The accreditation shall be current and in good standing.	Compliant.				
7	The Licensee shall submit to the Board a revised, Quality Assurance/Quality Control (QA/QC) Plan. The Plan shall be modified to include up to date sampling methods to all applicable standards, acceptable to an accredited laboratory as required by Part J, Item 5 and Part J, Item 6. The Plan shall include a covering letter from the accredited laboratory confirming acceptance of the Plan for analyses to be performed under this Licence.	<u>Plan provided in Water Quality Monitoring Plan and Quality Assurance/ Quality Control Plan, March 2013. Submitted as part of 2012 annual report.</u>				
8	Additional monitoring requirements may be requested by the Inspector.	Compliant. On September 2, 2009 the AANDC Inspector requested additional sampling for TCA Pond 2 (LUP-10). During the AANDC inspection of July 5 – 6, 2012, the inspector requested analysis of soil immediately downslope of the main tank farm hazardous waste storage area.				
9	The Licensee shall include in the Annual Report required under Part B, Item 2, all data, monitoring results and information required by this Part and the associated Schedule.	Compliant.				
10	The NWB may modify the Monitoring Program without a public hearing. Requests for changes to the Monitoring Program should be forwarded to the NWB in writing, and should include the justification and appropriate evidence to support the change.	NA No modifications to the monitoring program have been requested during the term of the Licence renewal.				

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Licence Condition		Status of Compliance	Short Term Plan for Compliance	Schedule for Implementation of Short Term Plan for Compliance	Long Term Plan for Compliance	Schedule for Implementation of Long Term Plan for Compliance
11	The Licensee is responsible for the monitoring during Care and Maintenance as set out in this Part. In the event the Licensee fails to carry out monitoring requirements set out in this Part that are essential to ensuring the integrity of significant site components, including fuel storage, general site deterioration, tailings containment, and site water and sewage management, Canada shall carry out such monitoring during periods of highest risk to fresh water.	See Compliance Status for Part J Item 1.				