

LUPIN MINES INCORPORATED

March 19, 2019

Richard Dwyer
Manager of Licensing
Nunavut Water Board
Box 119, Gjoa Haven, Nunavut
X0B 1J0

Via Email: Richard.dwyer@nwb-oen.ca, and
licensing@nwb-oen.ca

Re: Licence No. 2AM-LUP1520, Lupin Mine, Nunavut – Application for Licence Amendment and Renewal: Final Closure and Reclamation; LMI Response to Application Completeness Check Comments

Dear Mr. Dwyer:

On February 6, 2019 the Nunavut Water Board (NWB) acknowledged receipt of the Type “A” Water Licence application (the Application) and supporting documentation submitted on July 27, 2018 by Lupin Mines Incorporated (LMI). On February 1, 2019 the NWB confirmed receipt of correspondence from the Nunavut Planning Commission, confirming that the Lupin Mine Project was outside of an applicable land use plan, that it has previously been screened by the Nunavut Impact Review Board (NIRB) and that the Amendment/Renewal Application of the Water Licence is exempt from further screening by the NIRB based on the scope and previously amended project activities.

In its February 6, 2019 correspondence, the NWB had indicated that a preliminary review of the Application submission had been completed and that public distribution in support of an initial technical assessment could proceed. A completeness review and initial technical assessment was therefor requested of interested parties, including the identification of any Information Requests (IRs) to be filed with the NWB, to enable completion of the technical review of the Application.

Following an extension to the review period, on March 4, 2019, the NWB received a submission from Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC) with respect to their review of the Application, including the Final Closure and Reclamation Plan. Following receipt of the submission by CIRNAC, the NWB issued a request to LMI, for a response to the comments submitted, and to clearly indicate in the response which questions/concerns would be further addressed/discussed at the full technical review stage of the NWB process.

LMI has included as a response to CIRNAC’s submission, a table summarizing the concerns/questions raised and the initial response from LMI, and has identified which of those items will be addressed during the detailed technical review process. The main item identified

with respect to the general Application was the omission of 'attached' management plans. In an effort to reduce volume and repeated submissions of updated documents, Table A was provided with the Application (referenced in Sec. 9 of the application form) which included the list of all plans and most recent links to these plans on the NWB's ftp site (public register).

In addition to the main summary table, the original Table 14, from the FCRP has been revised and attached, with updates to the closure schedule, taking into account changes that were necessary to accommodate the needs of the contractor, winter road permitting and access, and closure financing delays with respect to the refund of security based on activities carried out over the past two years at the Lupin Mine Site.

LMI has indicated within the response table, items identified by CIRNAC that require further technical response and discussion. LMI looks forward to an open dialogue with the NWB, CIRNAC and other intervening parties on these and other issues as may be identified during the initial stages of the full technical review and technical discussions as may be required of the NWB during the processing of this Application.

In providing this submission, LMI anticipates that the NWB will be in a position to proceed to the next steps in its licensing process as outlined in their letter of February 6, 2019 once determining the Application to be complete.

If you require any further information, please contact at K.Lewis@mandalayresources.com or by Ph. (778)-386-7340.

Sincerely,

"Karyn Lewis"

Karyn Lewis
Project Manager, Lupin Mine and Ulu Gold Project

Attach: Table - LMI Response to CIRNAC March 4, 2019 Submission
FCRP Table 14 – Summary of Measures for Final Closure (Revised March 19, 2019)