

Ministère du Développement
Durable

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Department of
Sustainable Development

Ikupigvilirijikkut

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Reclamation re: Cover of Tailings plan and Other Aspects of A&R Plan

In determining the approximate reclamation costs, the characteristics (granular size and composition, including the use of kimberlite) and volumes of the cover material become an issue. In addition several points allude to the possibility of water cover on a portion of the tailings in the long term. At this stage of the operation's development, it is demonstrated that there is still research to be done to ensure the best long-term cover, cap and freeze integrity of the tailings. This is acceptable. However, there should be a clear understanding of what studies will be done, and when these studies will be done, so that regulatory agencies (led by the NWB) will have access to this information.

Monitoring of the Effect of the Mine on Its Surrounds, Most Specifically the Lakes and Aquatic Life

The SNP programs at both Lupin and Ulu are discussed in detail. The public assurance items which rise to the top include:

1. the need for standards for specific parameter limits if a particular substance is suspected to be hazardous to aquatic conditions and has a limit under any national guidelines. This has been addressed by the use of "combined" standards. However the issue remains with regard to selection of the limit. These need to be carefully discussed by the company and the authorities. If further studies are required to demonstrate the adequacy or inadequacy of a limit with regard to Contwoyto Lake or surrounding areas, these could be done cooperatively.

It is hoped that these comments assist the Nunavut Water Board in the water licensing process.

Thank you for including us in your review process. I encourage you to contact me directly if you have any questions or concerns regarding the attached comments and recommendations. I can be reached by telephone at 867-975-5911, by fax at 867-975-5980 or by email at cnichols@gov.nu.ca. I look forward to hearing from you in the near future.

Sincerely,

Chris Nichols
Manager, for Coordination of Environmental Assessment and Claims Implementation