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NUNAVUT WATER BOARD
NUNAVUT IMALIRIYIN KATIMAYINGI
OFFICE DES EAUX DU NUNAVUT

File No: 2AM-LUP2032

November 2, 2020

Karyn Lewis
Project Manager
Lupin Mines Incorporated
76 Richmond Street East, Suite 330
Toronto, ON M5C 1P1

Email: k.lewis@mandalayresources.com

Subject: Water Licence 2AM-LUP2032, Lupin Mine Project; Part E, Items 25, 26, and 27

Dear Ms. Lewis:

The Nunavut Water Board (NWB or Board) received from Lupin Mines Incorporated (LMI or Applicant) on June 8, 2020, three Technical Memorandums for Board review addressing Part E, Items 25, 26, and 27, of Water Licence 2AM-LUP2032 (Licence), with respect to the final closure and reclamation of the Lupin Mine Project (Project), as outlined below.

- *Water Licence Condition Part E-25 Design for the Waste Rock “Dome” at Lupin Mine*, addressing Part E, Item 25, of the Licence;
- *2AM-LUP2032 Technical Memorandum on Additional Geotechnical Details on TCA Dam K, and Dam M Cross Sections*, addressing Part E, Item 26, of the Licence; and
- *2AM-LUP2032 Technical Memorandum on Exposed Tailings Preliminary Cover Design*, addressing Part E, Item 27, of the Licence.

The Technical Memorandums were submitted to provide final plans for the aforementioned aspects of the closure and reclamation of the Lupin Mine site. These documents were distributed for a public review on June 10, 2020, requesting comments be submitted from interested parties by June 24, 2020.

Comments were received from the Kitikmeot Inuit Association (KIA) on June 24, 2020, and from Crown-Indigenous Relations and Northern Affairs (CIRNA), on August 25, 2020, following a request to extend the deadline for comments. Environment and Climate Change Canada (ECCC) advised the Board on June 24, 2020, that they reviewed the materials provided by LMI according to their mandate and have no comments at this time.

Copies of all documents received during the review of the information can be accessed through the NWB's Public Registry and FTP site using the following link:

<ftp://ftp.nwb-oen.ca/registry/2%20MINING%20MILLING/2A/2AM%20-%20Mining/2AM-LUP2032%20LMI/3%20TECH/E%20WASTE%20DISP/>

In their submission dated June 24, 2020, the KIA noted a need for a good understanding of waste rock quality for optimal Waste Rock Dome construction, requested additional information regarding geotechnical aspects of dam construction, and invited additional rational for tailings cover plans. LMI provided a response to these comments on July 9, 2020, noting that some of the requested information was discussed during the recent renewal and amendment of the Licence, and that they are “*presently working on an update to the Final Closure and Reclamation Plan, to address relevant comments and recommendations provided by intervening parties and the Board during the review process for the Application*” which will address many of the comments raised. The KIA responded on July 20, 2020, requesting additional information related to waste rock volumes, Acid Rock Drainage/Metal Leaching (ARD/ML) considerations, and to clarify various closure and reclamation plans associated with the Project. LMI provided a final response on August 4, 2020, fully addressing comments and concerns brought up during the review, closing by stating that “*LMI looks forward to working with the KIA on the development of a Post Closure Monitoring Plan (PCMP) in accordance with Schedule J of the Licence.*” The KIA confirmed on August 12, 2020, their satisfaction with the information provided.

In their submission dated August 25, 2020, CIRNA commented on erosion control measures planned for the waste rock dome, and site-specific designs for tailing’s preliminary cover design. LMI provided a response on September 30, 2020, providing clarification regarding erosion controls for the waste rock dome, and site-specific designs for tailing’s preliminary cover design. On October 9, 2020, CIRNA provided a response requesting additional information, that LMI responded to on October 19, 2020. CIRNA confirmed on October 30, that they had no further comments.

By copy of this letter, the Board confirms that it has completed its review of the above mentioned Technical Memorandums and related submissions, and finds the information functional and generally satisfying Part E, Items 25, 26, and 27 of Water Licence 2AM-LUP2032.

Should you have any questions please feel free to contact the undersigned via email at Derek.Donald@nwb-oen.ca or phone (867) 360-6338 (Ext. 32).

Sincerely,



Derek Donald
Technical Advisor
Nunavut Water Board

Cc: Distribution list – Lupin