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Nunavut Regional Office
P.O. Box 100
Iqaluit, NU, X0A 0H0
May 1, 2006

Your file - Votre référence
NWB1LUP0008/TR/D
Our file - Notre référence
IQA-N 9545-1-2LUPS

Phyllis Beaulieu
Manager of Licensing
Nunavut Water Board
P.O. Box 119
Gjoa Haven, NU X0B 1J0

Dear Ms Beaulieu:

Re: **Response to Dispose of Contaminated Soils Underground at Lupin Mine - Clarification**

The Nunavut Water Board (NWB) requested comments on the request by Kinross letter, dated February 28, 2006, for formal written approval from the Board for the underground disposal of surface soils containing residual hydrocarbons and/or elevated concentrations of metals into the Lupin Mine open stopes, then capping the area with one metre of sand or non-PAG waste rock and one metre or more of original surface till. Kinross provided further clarification on disposal into the stopes, including deposition methods and cover depths, in an April 28, 2006 letter.

Kinross verbally indicated during the April 11, 2006 technical meeting on the Tailings Containment Area A&R Plan that the soils in question are contaminated with diesel fuel, however INAC suggests that Kinross:

- define the contamination before placing the soils below ground;
- segregate out any soils contaminated with heavy hydro-carbons, such as hydraulic fluid, which may remain mobile in frozen soils: and
- determine/suggest another method of disposal of soils contaminated with heavier hydro-carbons.

Kinross has indicated that the contaminated soils will be deposited below ground and will be encapsulated in the permafrost. However, Kinross suggested in its Abandonment and Reclamation Plan for the Tailings Containment Area that permafrost may not exist in the area of the Lupin mine site within 200 years. INAC does not have a firm stance on the probability and extent of climate change but does note this apparent inconsistency. Therefore, INAC suggests that Kinross provide the NWB with a better justification for the permafrost encapsulation and a method to monitor and, perhaps, enhance the formation and maintenance of frozen conditions within the contaminated soils before placement of the esker sand.

Kinross has also indicated that the original surface till cover, removed prior to mining the crown pillars and stockpiled nearby, will be used as the final cover and contoured to suit the topography. INAC suggests that Kinross should, if possible, contour the topography to improve drainage away from the stopes to reduce the infiltration of water and a deepening of the active layer in the disturbed areas.

If you have any questions, please contact me at (867) 974-4550.

Original signed by James Rogers

Jim Rogers
Manager, Water Resources

cc Mike Tansey, Kinross
Spencer Dewar, INAC Lands