

**Lupin Mines Incorporated**  
(a subsidiary of Elgin Mining Inc. )

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May 10, 2013

Eva Paul  
Water Resources Officer  
Aboriginal Affairs and Northern Development Canada  
Nunavut Regional Office  
Building 918, PO Box 100  
Iqaluit, NU X0A 0H0  
Via email: [eva.paul@aandc.gc.ca](mailto:eva.paul@aandc.gc.ca)

**Subject: Response to AANDC Letter regarding Notification of Care and Maintenance –  
Temporary Closure, for Water Licence 2AM-LUP0914 dated April 22, 2013**

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Dear Ms. Paul

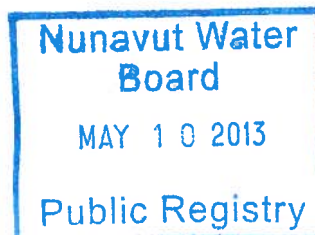
This letter is intended to address your concerns with respect to recent decision to return Lupin mine site to an un-occupied status while still in Care and Maintenance. LMI is well aware of its commitments and responsibilities under the Licence as well as various regulatory legislations, etc.

Care and Maintenance

**“Action 1: LMI shall submit to the Nunavut Water Board (“the Board”) and to the Inspector an updated and revised Care and Maintenance Plan that accurately reflects the conditions on-site and which fully addresses site water management. This Plan shall be received by the Board and the Inspector no later than May 31, 2013.”**

An updated Care and Maintenance Plan that reflects current conditions at site and water management is provided in Appendix 1. With respect to the Mine Site Reclamation Guidelines (MSRG) for temporary mine closure; the site has been secured in compliance with the items listed in your letter. LMI staff will make periodic site visits to ensure the security and safety of the site.

**“Action 2: If placed into temporary closure, LMI shall submit to the Inspector a report documenting the shutdown of the site as described above. This report will include a complete inventory of chemicals and reagents, petroleum products, and other hazardous materials, including their quantity,**



location, and form of secondary containment. This report shall be submitted to the Inspector 14 days following closure of site."

A Report outlining the conditions identified in the MSRG and the inventory of chemicals and petroleum products, including their quantities is provided in Appendix 2.

**"Action 3: LMI shall submit to the Inspector for approval a detailed schedule of inspections and monitoring that demonstrates LMI's due diligence to meet its legal obligations under the water licence. Pursuant to Part J Item 8, additional monitoring requirements may be requested by the Inspector. This schedule shall be submitted to the Inspector prior to site closure, or at the latest by May 1, 2013.**

A schedule of proposed inspections and monitoring while the mine site is in un-occupied status is provided in Appendix 3.

LMI trusts that you will find this response and associated plan for achieving and maintaining compliance acceptable. If you have any questions please contact Dave Vokey at: [dvokey@elginmining.com](mailto:dvokey@elginmining.com)

Sincerely,

**Lupin Mines Incorporated**



Wayne Osborne  
Project Manager

Cc: J. Currie, P. Eng  
P. Downey, P. Eng  
D. Vokey

Attachments

Appendix 1 – Care and Maintenance Plan (updated)  
Appendix 2 – Chemicals and Petroleum Products  
Appendix 3 – Monitoring and Inspection Schedule