

LUPIN MINES INCORPORATED

## 2021 Lupin Mine Dome Design Issued for Construction Drawings

### *Review Comment Responses*

Submitted to:

**Nunavut Water Board**

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Submitted by:

**K. Lewis, Project Manager**

On behalf of:

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c/o Mandalay Resources Corporation

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October 29, 2021

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## 1.0 CROWN-INDIGENOUS RELATIONS AND NORTHERN AFFAIRS CANADA (CIRNAC)

<b>Interested Party:</b>	CIRNAC	<b>Technical Comment No:</b>	See below
<b>Subject/Topic:</b>	Part 1, Reply to LMI's Specific Responses to CIRNAC Comments on Dome Design Part 2, Drawings 1, 2 and 3		

**Reference:** Dome Design and Drawings Drawing 19136158-0002-CM-0001\_Rev 1 Proposed Waste Rock Dome (Dwg1); Drawing 19136158-0002-CM-0002 Rev 1 Proposed Waste Rock Dome Sections and Details; (Dwg2); Drawing 19136158-0005-CM-0001 Rev D titled Proposed Waste Rock Removal and Placement (Dwg3)

### **Detailed Review Comment by Party (September 28, 2021):**

Part 1 of this letter addresses LMI's responses on Crown-Indigenous Relations and Northern Affairs Canada's (CIRNAC) comments on the Part E, Condition 25 Dome Design and Part 2 provides CIRNAC's comments on the Dome Design Issued for construction drawings 19136158-0002-CM-0001\_Rev 1 Proposed Waste Rock Dome (Dwg1), Drawing 19136158-0002-CM-0002 Rev 1 Proposed Waste Rock Dome Sections and Details (Dwg2) and Drawing 19136158-0005-CM-0001 Rev D titled Proposed Waste Rock Removal and Placement (Dwg3).

LMI's August 6, 2021 response:

- In Part 1, addressed comments a, b, d, e, f, g, and h. Comment (c) considered resolved at the moment;
- In Part 2, Drawing 19136158-0002-CM-0001\_Rev 1 Proposed Waste Rock Dome (Dwg1), addressed comments a, c, d, e. Comment (b) considered resolved at the moment;
- All comments in Drawing 19136158-0002-CM-0002 Rev 1 Proposed Waste Rock Dome Sections and Details (Dwg2) were addressed; and
- In Drawing 19136158-0005-CM-0001 Rev D titled Proposed Waste Rock Removal and Placement (Dwg3), comments c, d, and e were addressed.

### **Request or Recommendation by Party (September 28, 2021):**

CIRNAC's concerns were addressed or considered resolved at the moment

### **LMI Response (October 29, 2021):**

LMI thanks CIRNAC for their responses.

Resolved

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<b>Interested Party:</b>	CIRNAC	<b>Technical Comment No:</b>	Part 2 - A
<b>Subject/Topic:</b>	Contaminated Soil to be Excavated		

**Reference:**

- Drawing 19136158-0005-CM-0001 Rev D Proposed Waste Rock Removal and Placement

**Detailed Review Comment by Party (October 12, 2021):**

In Drawing 19136158-0005-CM-0001 Rev D titled Proposed Waste Rock Removal and Placement (Dwg3), comments (a) and (b) remain outstanding.

CIRNAC recommended that LMI provide the inferred boundaries and depths of the contaminated soils to be excavated.

LMI in response, made reference to the Golder 2017 Site Environmental Assessment updates which provides approximate estimated dimensions of the contaminated areas.

**Request or Recommendation by Party (October 12, 2021):**

CIRNAC does know the status of closure works, but if all contaminated soils have been removed, CIRNAC would expect that LMI has records of actual extent of soil removal that can be shown on a drawing.

CIRNAC concern remain outstanding.

**LMI Response (October 29, 2021):**

The actual extents of soil removal will be shown on a drawing and provided as evidence to support security reductions.

<b>Interested Party:</b>	CIRNAC	<b>Technical Comment No:</b>	Part 2 - B
<b>Subject/Topic:</b>	Area Cleared for Waste Rock Removal		

**Reference:**

- Drawing 19136158-0005-CM-0001 Rev D Proposed Waste Rock Removal and Placement

**Detailed Review Comment by Party (October 12, 2021):**

In Drawing 19136158-0005-CM-0001 Rev D titled Proposed Waste Rock Removal and Placement (Dwg3), comments (a) and (b) remain outstanding.

CIRNAC recommended that LMI provide details on the order and schedule of construction activities related to the removal of materials from areas cleared for waste rock removal, placement of contaminated materials underground and debris as approved underground, filling of surface openings (shafts, vents, portal, waste rock excavation and relocation, cover placement planned for 2021).

LMI in its response, pointed out that the black outlined area A,B,C and D on Dwg 19136158-0005-CM-0001 Rev D are areas where no contamination were found in either of the Environmental Site Assessments.

Detailed schedule of construction activities related to the removal of materials from the waste rock, placement of contaminated materials underground and debris as approved underground, filling of surface openings (shafts, vents, portal) waste rock excavation and relocation, cover placement planned for 2021 was not provided. CIRNAC has not been provided with any of the Field Communications where instructions/further details have been provided to the contractor on site with respect to this work. It would help CIRNAC and its inspectors to see this information so as to understand what instructions have been provided to the contractor in this regard.

**Request or Recommendation by Party (October 12, 2021):**

CIRNAC concerns remain outstanding.

**LMI Response (October 29, 2021):**

On August 26, 2021, LMI advised CIRNAC that the work at the mine site area was anticipated to be completed in 2022. The construction summary report, under Water Licence 2AM-LUP2032, Part G, Item 3, will provide CIRNAC with the understanding of what instructions were issued to the contractor as required:

“The Licensee shall, within ninety (90) days of completion of each facility designed to contain, withhold, divert or retain Waters or Wastes, submit to the Board for review, **a Construction Summary Report prepared by a qualified Engineer(s)** in accordance with Schedule G.”

The Construction Summary Report referred to in Part G, Item 3 shall include:

- A summary of construction activities including photographic records before, during and after construction;
- As-built drawings;
- Documentation of field decisions that deviate from original plans and any data used to support these decisions;

- d. Discussion of mitigation measures implemented during construction as well as their effectiveness;
- e. Monitoring undertaken in accordance with Part G;
- f. Blast vibration monitoring for any quarrying activity carried out in close proximity to fish bearing waters;  
and
- g. Monitoring for sediment release from construction areas.

**Reference(s):** Water Licence 2AM-LUP2032