



Indian and Northern
Affairs Canada
www.inac.gc.ca

Affaires indiennes
et du Nord Canada
www.ainc.gc.ca

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

May 9, 2005

Manager of Licensing
Nunavut Water Board
P.O. Box 119
Gjoa Haven, NU, X0E 1J0

Your file - Votre référence
NWB1LUP0008

Our file - Notre référence
9545-1-1-LUP-G

Via electronic mail to:
licensing@nwb.nunavut.ca

Re: Submission of 2005 Final Abandonment and Restoration Plan - Lupin Mine

On behalf of Indian and Northern Affairs Canada-Water Resources Division (INAC-WRD), I would like to thank the Nunavut Water Board (NWB) for the opportunity to provide comment on the Final Abandonment and Restoration Plan (the A&R plan) submitted by Kinross Gold Corporation on behalf of Echo Bay Mines Limited (The Licencee) in accordance with Water Licence NWB1LUP0008.

On April 27, 2005, the NWB circulated a letter requesting that parties provide opinions on “the adequacy of proceeding with the stand-alone approval of the reclamation of the Tailings Containment Area as proposed by Kinross”. It is the understanding of INAC-WRD that the NWB is specifically referencing the *Closure Plan for Tailings Containment Area* (January 2005, I. Holubec Consulting Inc.), Appendix 2 of the A&R Plan, in their request for comment and approval.

INAC-WRD is not philosophically opposed to the NWB proceeding with separate approvals for the Tailings Containment Area (TCA) and the Lupin mine site and infrastructure. INAC-WRD’s position is, however, subject to the following conditions:

1. INAC-WRD does not support the issuance of final approval for the TCA Closure Plan as it is currently presented. While the TCA Closure Plan represents significant progress toward a final closure plan for the TCA, INAC is of the opinion it will require additional technical review and possible modification prior to final approval.
2. Before agreeing to any proposed splitting of Lupin A&R components, INAC-WRD requests that the NWB provide clear guidance on the review and approval processes, and procedures thereof, to be followed for the A&R of each component and for the site as a whole.

3. Final approval of TCA A&R requires a holistic evaluation of TCA site. The Licensee must demonstrate that all areas and aspects of TCA A&R employ methodology appropriate for permanent TCA closure. This information encompasses, but is not limited to:
 - a. proposed reclamation activities
 - b. progressive reclamation already completed in the TCA
 - c. future monitoring and contingency planning
4. Separate approval of the TCA A&R plan should proceed only if the Licensee can demonstrate that TCA reclamation can be undertaken and completed as an independent A&R component. Following TCA reclamation, interactions with other site components, or the reclamation thereof, should not remain. The Licensee will be required to clearly delineate the geographic boundaries to be encompassed in the TCA A&R.

INAC-WRD looks forward to working with the NWB and the Licensee on the forthcoming review of the Lupin A&R plan. Please do not hesitate to contact the undersigned if you have any questions or concerns with respect to this submission.

Best regards,

Original signed by:

Stephanie Hawkins
Qikiqtani Regional Coordinator
Water Resources
Phone: (867) 975-4555
Fax: (867) 975-4585
Email: hawkinss@inac-ainc.gc.ca

cc Manager, Water Resources, INAC
 Mike Tansey, Lupin Mine
 Colette Spagnuolo, Environment Canada
 Tania Gordanier, Fisheries and Oceans Canada