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**June 23, 2021**

Mr. Richard Dwyer, Manager of Licensing  
Nunavut Water Board  
Gjoa Haven, NU

Via Email: [licensing@nwb-oen.ca](mailto:licensing@nwb-oen.ca)

**Re: 2AM-LUP2032 Lupin Mines Incorporated Final Post Closure Monitoring Plan**

Dear Sir:

This is the submission of the Kitikmeot Inuit Association (“KIA”) in response Lupin Mines Inc. (LMI) Responses to KIA’s technical comments to the Lupin Final Post-Closure Monitoring Plan (PCMP) for water license 2AM-LUP2032 made by LMI on June 15, 2021.

## **I. BACKGROUND:**

The KIA is the Regional Inuit Association for the Kitikmeot Region of Nunavut and the Designated Inuit Organization for Article 20 of the Nunavut Agreement for the Kitikmeot Region. The KIA is not a regulating agency with respect to this project, however we are representing Inuit interest due to the historic importance of Tahikyoak (Contwoyto Lake).

KIA has reviewed the materials filed in support of the PCMP by LMI. We have been assisted in this review by Mr. Steve Januszewski, P.Eng., of SteveJan Consultants Inc. (SJCI).

KIA staff and advisors have reviewed the submitted materials by LMI during the preparation of this submission to the Board.

## **II. KIA SUBMISSIONS:**

KIA’s resources are limited and our work reviewing LMI’s submitted materials benefitted from retaining SJCI to assist in the review. Furthermore, the SJCI technical memorandum in response to LMI’s Lupin PCMP is enclosed and forms the submission.



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The KIA thanks the Board for the opportunity to address our concerns regarding this file. Should you have any questions or would like any clarification, I can be contacted at [srlands@kitia.ca](mailto:srlands@kitia.ca) or by phone at (867) 982-3310.

**ALL OF WHICH IS RESPECTFULLY SUBMITTED:  
ON BEHALF OF THE KITIKMEOT INUIT ASSOCIATION**

A handwritten signature in black ink, appearing to read "Wynter Kuliktana".

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Wynter Kuliktana  
Senior Lands Officer  
Department of Lands, Environment & Resources  
Kitikmeot Inuit Association

Cc: Geoff Clark, Kitikmeot Inuit Association Director of Lands, Environment and Resources

Enclosed: SJCI review of LMI's responses to pcamp tc's 210622 Final.pdf



**SteveJan Consultants Inc.**  
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CANADA  
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June 22, 2021

Ms. Wynter Kuliktana  
Senior Lands Officer  
Kitikmeot Inuit Association  
P. O. Box 360  
Kugluktuk, NU X0B OEO

**Review of Lupin Mine Inc.'s June 15, 2021 Responses to KIA's Technical Comments on Post-Closure Monitoring Plan Document**

Dear Ms. Kuliktana,

Steve Januszewski of SteveJan Consultants Inc. (SJCI) has reviewed the recent memo by K. Lewis of LMI to the NWB. Copies were provided to stakeholders that had provided technical comments on the company's draft Post-Closure Monitoring Plan (PCMP), including the KIA.

**1. OVERVIEW**

On June 16, 2021 SJCI received an e-mailed request to provide comments on the recent LMI document. SJCI has previously provided technical support to the KIA in reviewing documents provided by LMI as they prepared for and subsequently began active closure of the Lupin Mine. It is understood the Nunavut Water Board (NWB) has asked for comments on the LMI document to be submitted by June 23, 2021.

**2. COMMENTS ON LMI'S RESPONSES**

The LMI document provides responses to 7 technical comments provided by the KIA. Comments on LMI's responses are provided below,

TC 1 – Duration of post-closure monitoring: The document should be consistently stating the monitoring will continue for as long as required, and notably as specified in the Water Licence. This is not the case through the entire document.

The KIA accept the clarification there is no Phase 3 of closure monitoring, and only 2 Phases in total.

TC 2: LMI continues to downplay its focus within the PCMP document on discussing possible reductions in monitoring requirements versus presenting alternate changes (both more or less in scope) that may be required, including increases in monitoring that may be required for the most likely scenarios and attempting to track down the source(s) of the problem.

TC 3 – Lowering of lower pH limit for TCA discharge: Significantly more historical and current downstream water quality data would need to be collected to justify a lower pH limit, including examples of other northern sites where such allowances have been made. Keeping the limit where it is (pH 6.0) and operating the TCA and discharge at a slightly higher pH will add a little buffering capacity and a cushion should any ML/ARD begin to develop within the basin. This is in LMI's best interest. As the pH is

allowed to get lower metals solubility increases and this will overflow water from the TCA and enter the downstream environment.

This point was also raised in CIRNAC's TC 1.

TC 4 – Range of scenarios considered in AMP: The LMI response continues to state that outlining a reduced monitoring program is an AMP. An Adaptive Management Plan needs to consider various possible scenarios including ones which may include additional monitoring. The text of the LMI memo acknowledges this to be the case, as an afterthought. But there is no presentation of alternative management plans in the PCMP. A range of scenarios should be presented in the final version of the PCMP.

Similar concerns were raised by ECCC in TC 2.

TC 5: Adequacy of community consultations: In the latest discussions SJCI provided comments on community consultations based on information provided by the KIA. An error may have been made concerning there not being any meetings or consultations some two months ago. These recent communications by LMI were pushed for by the KIA. However, this recent effort is well after there should have been meaningful dialogues with local stakeholders and in this case, the hamlet of Kugluktuk. These should have taken place before active reclamation work commenced and well before the Covid pandemic, which took effect in March\April last year. LMI should make every effort to involve the community in the future.

The CIRNAC had a similar comment in their TC 3.

TC 6 Site weather station: Concerning the fate of the automated weather station at the site, KIA has no further comment as it is between LMI and CIRNAC who own and operate the station on a small land lease at the site.

TC 7 Geo-technical instrumentation: Replacing exiting damaged geotechnical instrumentation (e.g., D1A-00-01S, D4-3 in Dams 1A and 4) is still considered a valid point especially as the units have significant historical data and could continue to be utilized and provide meaningful data and are to be sampled "...if possible..."as is stated in the Water Licence.

This is similar to a comment made by CIRNAC in TC 11.

Additionally, on-site instrumentation should continue to be downloaded during routine annual geo-technical inspections and Water Quality sampling campaigns. Dropping the frequency to every 3, 5 or 10 years misses the opportunity to react in a timely manner should the data show there may be problems,

<Original signed by>

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S. Januszewski, P. Eng. (BC)  
Principal Engineer  
SteveJan Consultants Inc.