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**July 16, 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  
Round 2 Responses**

Dear Sir:

This is the submission of the Kitikmeot Inuit Association (“KIA”) in response Lupin Mines Inc. (LMI) Round 2 Responses to KIA’s technical comments to the Lupin Final Post-Closure Monitoring Plan (PCMP) for water license 2AM-LUP2032 made by LMI on July 6, 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: 20210716-SJCI review of LMI's Round 2 Responses to PCMP TC's Final.pdf



**SteveJan Consultants Inc.**  
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CANADA  
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July 15, 2021

Ms. Wynter Kuliktana  
Senior Lands Officer  
Kitikmeot Inuit Association  
P. O. Box 360  
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## **Review of Lupin Mines Inc.'s July 5, 2021 Round 2 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 Lupin Mines Inc. (LMI) to the Nunavut Water Board (NWB) on behalf of the Kitikmeot Association (KIA). The LMI comments are considered Round 2 of an iterative review process of the company's Post-Closure Monitoring Plan (PCMP). Copies of the Plan were provided to stakeholders that had provided technical comments on the company's PCMP, including the KIA.

### **1. OVERVIEW**

On July 12, 2021 SJCI received an e-mailed request to provide comments on the most recent LMI rebuttal document to the stakeholder's (i.e., ECCC, CIRNAC & KIA) comments on the PCMP. 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 NWB has asked for comments on the latest LMI document to be submitted by July 16, 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,

Please Note: LMI consistently refers to SteveJan Consultants Inc as SJCJ. This is incorrect. The correct acronym is SJCI as is stated on all documents to the KIA and LMI.

**TC 1 – Duration of post-closure monitoring:** The KIA appreciates LMI making the correction that there are 2 phases of closure monitoring and not 3 as was stated inadvertently in the PCMP text.

LMI has confirmed in its response that P-C monitoring will continue for as long as required as stipulated in the Water Licence, and not necessarily for 5 years as is stated several times in the PCMP text. This should be corrected in the next update to the PCMP.

The KIA considers this item resolved.

**TC 2- LMI Focus on Reducing Monitoring Requirements:** 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.

Text in the next updated PCMP should include a discussion on the wider range of triggers that may be required as a result of site monitoring.

The KIA consider this item resolved.

**TC 3 – Lowering of lower pH limit for TCA discharge:** The KIA accepts that LMI is mentioning the possible future application for a lower final discharge pH limit in the PCMP and that the text is not intended to be the beginning of an application for such a change.

The KIA considers this item resolved.

**TC 4 – Range of scenarios considered in AMP:** LMI states the Water Licence requested a description of thresholds that may trigger reduced monitoring requirements. Including such text in the PCMP is considered appropriate. However, there is no presentation in the PCMP of other scenarios that may require adaptive management responses as it would seem short-sighted to only include adaptive management to reduce monitoring requirements and not also include triggers that may warrant increases in monitoring or other remedial measures. The text of Section 6.2.2 mentions the implementation of a forensic program should the discharge pH be dropping during the active phase. However, this only presents one possible scenario and at one time. A range of scenarios should be presented in the final version of the PCMP in a revised Section 6.2.6, which could be titled Adaptive Management Framework, of which reductions could be one sub-section, and increases in another.

**TC 5 – LMI’s consultations with local stakeholders:** The introductory section of the latest LMI document states;

*“ Due to COVID restrictions, LMI was not able to carry out in-person consultation with the community of Kugluktuk, but we hope that we will be able to provide an in-person update at some point in the near future.”*

As SJCI stated previously, the consultations should have begun well before March 2020 when the reclamation plan was being developed which seems to be when LMI considered having the consultations. Through COVID, and now, with the active reclamation work nearly completed, the community will have little input in what is done at the site and how the community can be involved.

It is understood that the first consultations by LMI with the Kugluktuk community was in early April 2021.

Secondly, the goal is not for LMI to provide an “...in-person update at some point in the near future” but to have a two-way discussion on the reclamation plan and the post-closure period plans and what possible considerations the company can make to accommodate the community’s concerns and/or suggestions.

It is understood from the KIA that LMI did not want to utilize a consultation group with selected participants that were familiar with the Contwoyto Lake area and would have involved intervenor funding to enable participation, as is typical in such industrial and especially mining projects.

The LMI response mentions a June 24, 2021 community engagement call but does not mention any comments or suggestions that came from the call. The KIA appreciate LMI's efforts in making the call a more successful exchange of information with the community.

LMI should continue to involve the community in the future as the final active reclamation work is being completed and longer-term closure monitoring is implemented.

The KIA consider this item resolved.

**TC 6 - Site weather station:** SJCI thanks LMI for clarifying that the ECCC is the owner and operator of the weather station. The KIA has no further comment on this issue although no clarification has been received by SJCI on the fate of the station moving forward. It is hoped that if the station continues to be operated that the data from it would be available, likely presented in the site's annual report to NWB or directly upon request from ECCC.

**TC 7 - Geo-technical instrumentation repair/replacement:** CIRNAC had similar concerns in their TC 11.

LMI and CIRNAC consider this item resolved (based on their latest communications as provided in the July 5, 2021 LMI document).

The KIA also considers this item resolved.

<Original signed by>

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