



P.O. Box 360
Kugluktuk, NU X0B 0E0
Telephone: (867) 982-3310
Fax: (867) 982-3311
www.kitia.ca

August 5, 2021

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

Via Email: licensing@nwb-oen.ca

**Re: 2AM-LUP2032 Lupin Mines Incorporated Final Post Closure Monitoring Plan
Round 3 Technical Comment Responses**

Dear Sir:

This is the submission of the Kitikmeot Inuit Association (“KIA”) in response to Lupin Mines Inc. (LMI) Round 3 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 29, 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 LMI response to technical comments filed in support of the FCRP and supporting documents 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 technical comment responses under the Lupin 2020 FCRP 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 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".

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 Round 3 Responses to PCMP TC's 210804.pdf



SteveJan Consultants Inc.
192 Werra Road
Victoria, BC V9B 1N4
CANADA
Mobile: 250-850-9002

August 4, 2021

Ms. Wynter Kuliktana
Senior Lands Officer
Kitikmeot Inuit Association
P. O. Box 360
Kugluktuk, NU X0B 0EO

Review of Lupin Mines Inc.'s July 29, 2021 Round 3 Responses to KIA's Technical Comments on the Post-Closure Monitoring Plan

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 latest LMI comments are considered Round 3 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 August 3, 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. This document is a continuation of that same process. It is understood the NWB has asked for comments on the latest LMI document to be submitted by August 5, 2021.

2. COMMENTS ON LMI'S RESPONSES

Six of the seven KIA technical comments have been resolved to KIA's satisfaction. Interestingly, in LMI's latest response to KIA Technical Comment (T.C.) No. 4, LMI has decided to consider the 7th item resolved.

KIA T.C. No. 4 deals with the required elements in an Adaptive Management Plan or framework.

However, seeing as the ECC (in their T.C. No. 2) is content with the LMI response on this issue and that CIRNAC did not raise the issue, the KIA can agree to drop the item and consider it resolved.

<Original signed by>

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