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November 28, 2005

BY FAX (867 983-2594) and e-Mail

Ms. Stephanie Briscoe
Executive Director
Nunavut Impact Review Board
P.O. Box 2379
Cambridge Bay, Nunavut
X0B 0C0

Dear Ms. Briscoe:

Re: NIRB Conformity Review of Meadowbank FEIS and Hearing Schedule and Associated Matters

Thank you for your letter of November 25th, 2005 and the attached table in which you outline the results of the Nunavut Impact Review Board's (NIRB) internal conformity review of Cumberland Resources Ltd.'s Final Environmental Impact Statement (FEIS) for the proposed Meadowbank project and include information about deadlines in respect of this NIRB proceeding. Cumberland has reviewed the conformity analysis set out in the letter and the process proposed by NIRB. We set out our comments in response to your letter below.

The Proposed Timing of the Process and Final Hearings:

The Meadowbank Project will have a substantial and positive impact on the economy of Nunavut and Canada. It will cost \$300 million to construct, employ 370 people, and generate an estimated \$1.4 Billion contribution to the GDP of Nunavut over its 10 year schedule of construction and production. In every way Meadowbank is a real project which promises important benefits to Baker Lake, the Kivalliq region and Nunavut and, based on almost 10 years of environmental studies conducted by Cumberland, will have no significant negative social or environmental impacts.

The proposed hearing dates of April 2, 2006 could significantly prejudice Cumberland's plans for the development of the Meadowbank project. As you are aware the construction

phase of the project relies heavily on the ability to engineer, procure and ship the necessary materials within a short shipping season into Baker Lake in order to undertake a full construction program. We are very concerned that scheduling the Meadowbank hearings in April will place an undue burden on this process, leading to a delay or undesirable and costly extension of the construction schedule. The inevitable result will be a postponement of the economic opportunities and benefits the project can offer to Nunavut, the Kivalliq region and to Baker Lake in particular. It is also possible that such a delay may jeopardize the economic attractiveness of the Meadowbank project as changing commodity prices dictate our ability to attract the necessary project financing required to build the project.

The parties to this proceeding should already be very familiar with the project and with the issues addressed in the FEIS. They have reviewed a very extensive DEIS and have participated in a thorough exchange on the project addressing a whole range of issues at the technical meetings where all parties brought significant expertise to bear on questions about the project. Supplementary filings in response to the issues raised at the pre-hearing meeting began in the summer of 2005 and continued until the filing of the FEIS. The time proposed between the filing of the FEIS and the initiation of NIRB hearings is almost five months. This in our opinion is too long a period. We realize the NIRB has two proceedings ready to proceed to hearing in early 2006. We suggest, however, that there may be alternatives to doing these hearings one after another in linear fashion. We believe and hope that the length of the gap between the Miramar hearing and the proposed Cumberland hearing can be shortened. One possible approach might be for NIRB to complete both hearings, Miramar in January and Cumberland in late February, and then write both reports after the hearings were complete. There may be other options for compressing the time scale which can be considered if NIRB staff, the parties and Cumberland work collaboratively to this end. This is the most pressing subject which we suggest should be a topic of discussion in a December 15th teleconference.

The Conformity Analysis:

Earlier in this proceeding NIRB established a “presence/absence” test for DEIS conformity. As we understand the way that test would be applied to the FEIS and the materials supplied in response to the commitments made by Cumberland at the pre-hearing meeting and to the “key issues” set out in the pre-hearing decision, some evidence had to be included in the FEIS on each of those matters.

Based on that test, to date we are pleased that we received a total of 778 “yes” conformity decisions and only 18 “no” conformity decisions. We note that in at least 6 of the 18 “no” conformity decisions NIRB provides comments about the information provided and asks for additional information. These 6, in our opinion, could have been registered as yellow “yes” decisions.

As for the issues where NIRB made “no” decisions, we can assure the board and all parties that the conclusions put forth in the FEIS were carefully considered on the basis of all the information available to Cumberland to date. If NIRB requires additional

information about the items identified as being in non-conformity, Cumberland will be pleased to provide that information in expeditious fashion. Therefore, in order to move forward in a timely matter and to avoid further delays, it is Cumberland's intention to respond with additional information, analysis or an explanation of the FEIS contents in respect of each of these 18 "no" decisions on or before December 15th, 2005.

There are also a number of yellow cells in the NIRB table which indicate a "yes" to conformity but include comments about the information provided to date. Cumberland would like to respond to these concerns when it responds to concerns of the other parties by the proposed mid February, 2006 deadline suggested in the NIRB November 25, 2005 letter. We intend to respond to all comments received then and will include any additional material required to respond to the yellow cells at that time.

Consequently, Cumberland will complete its response to NIRB's non-conformity concerns by December 15th.

The Proposed FEIS Conformity Meeting:

Cumberland intends to respond to conformity issues in expeditious fashion as set out above. NIRB has invited the parties to a meeting on December 15th to discuss "the deficiencies arising from its [NIRB's] internal conformity review" and the timing and submission deadlines, and other matters relevant to the review.

It does not appear to Cumberland that a face-to-face meeting is necessary with the parties to discuss NIRB's conformity concerns. In our view the analysis conducted by NIRB and set out in your November 25th letter is very clear and we want to act on them immediately to move this process along.

As mentioned, Cumberland does see value in a teleconference to discuss timing issues related to this proceeding and would encourage NIRB to organize such a meeting for December 15, 2005.

The timing of the hearing is a critical issue in respect of the Meadowbank project. We hope that NIRB will consider organizing a teleconference to encourage an open and constructive discussion of timing options with Cumberland and the other parties to this proceeding. We look forward to your response.

Yours truly,

CUMBERLAND RESOURCES LTD.

Craig Goodings,
Manager, Environmental and Regulatory Affairs