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July 14, 2006

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

Ms. Karlette Tunaley
Technical Advisor
Nunavut Impact Review Board
P.O. Box 2379
Cambridge Bay, Nunavut X0B 0C0

Dear Ms. Tunaley:

Re: Comments on Cumberland's Submission regarding Meadowbank Gold Project and the Proposed Temporary Explosives Factory

In accordance with NIRB's Tuesday July 11, 2006 letter, Cumberland is pleased to provide responses to NIRB's seven questions in Item 3:

"Item 3 - Cumberland's proposed Temporary Explosives Factory (Factory) for the Meadowbank Gold Project, will be provided on or before July 14th, 2006."

1. The specific location of the Factory
2. How the Factory will be secured from Public access
3. Description of the Factory structure and the proposed activities to be carried out at the structure
4. Duration of use of the Factory
5. Whether or not the Hamlet of Baker Lake has a regulatory role and other appropriate permitting requirements (including any amendments to the Hamlet's water licence)
6. Emergency response plans
7. If and when Cumberland intends to inform the Hamlet and residents of Baker Lake of the Factory and the activities to be carried out at the Factory

As instructed, Cumberland has also reviewed the submissions on Item 3 received from Nunavut Tunngavik Incorporated (NTI), GN, NRCan, TC, the Municipality of Rankin Inlet, and Hatch Acres Incorporated.

NIRB QUESTIONS AND CUMBERLAND RESPONSES

NIRB Question 1: The specific location of the factory.

Cumberland Responses

The factory is actually a truck called a mix-truck (see photo below) and would be operated under a Temporary Explosives Factory Licence. The mix-truck carries ammonium nitrate (a common fertilizer which is not an explosive on its own) and diesel fuel in separate tanks. Once parked over a blast hole, the ammonium nitrate is blown through a long hose into the drilled out blast hole. A specific amount of diesel is added to the ammonium nitrate (AN) as it is blown through the hose; the mixed product is now an explosive.

The mix-truck does not contain explosive but is designed to manufacture explosive product at the blast hole location. This process requires a precision mixing of both AN and diesel in order for explosive qualities to be produced. The explosive product is immediately discharged into the blast hole. This is a safer option than using a pre-manufactured product which would require transportation to the blast site.

When the mix-truck is not in the process of loading (charging) holes it is not carrying any explosive, only AN and diesel fuel in separate tanks. When not in use the mix-truck will be stored in a mix-truck storage building in a location with suitable set backs as per NRCan's approved distances. The mix truck storage building is a pre-fabricated building with a vinyl floor liner for washing the vehicle if or when necessary. Waste water production will be negligible resulting from the use of a common portable pressure washer used to keep the truck clean. This cleaning is generally done only during repairs. If waste water is produced it will be collected in a sump or barrels for disposal at an approved location.

AN EXAMPLE OF A MIX TRUCK



NIRB Question 2: How the Factory will be secured from Public access?**Cumberland Responses**

The mix-truck storage building will be kept locked and secured. No explosives will be present in the building.

NIRB Question 3: Description of the Factory structure and the proposed activities to be carried out at the structure.**Cumberland Responses**

The mix-truck will have two tanks, one for AN and one for diesel fuel. The mix-truck will also have augers, pumps and hoses for mixing and blowing the product into a blast hole while loading. A licenced explosives contractor will operate the mix-truck.

NIRB Question 4: Duration of use of the factory?**Cumberland Responses**

The mix-truck would be used for construction of the access road and any blasting required for the Baker Lake laydown area, especially tank farm foundations. After that, the mix-truck would be driven to the Meadowbank site for on-site blasting requirements.

NIRB Question 5: Whether or not the Hamlet of Baker Lake has a regulatory role and other appropriate permitting requirements (including any amendments to the Hamlet's water licence)?**Cumberland Responses**

The Hamlet may have to approve the location for the temporary mix-truck storage building, however it will not contain or store explosives. The temporary explosive factory licence will be applied for and held by the licenced explosive contractor. While we do not currently see the need for a water licence specific to the activities of the mix truck or storage building, if it is required, it will be applied for and will be held in Cumberland's name.

NIRB Question 6: Emergency Response Plans**Cumberland Responses**

An Emergency Response Plan document was submitted as part of the Final EIS: Supporting Documents. Site-specific emergency response plans would be produced as required in the regulatory phase.

NIRB Question 7: If and when Cumberland intends to inform the Hamlet and residents of Baker Lake of the Factory and the activities to be carried out at the factory?

Cumberland Responses

*Although there have been discussions with NRCan about temporary explosive factory licences, to date **no actual licences** have been applied for. The potential use of a mobile mix-truck is an option Cumberland is seriously considering to improve safety, efficiency and maintain construction schedules. If chosen, discussions on the use and storage of the mix-truck will likely be held with the Hamlet and community after August 2006 as the project prepares for the regulatory phase and Cumberland finalizes its plans. If this year is lost, then no discussions will be held, as other options may be more appropriate.*

We note that in its June 30th letter to NIRB, NRCan, the authorizing agency and federal expert on explosives, "does not anticipate having any concerns with what the proponent has proposed.... if operated in compliance with regulations...". NRCan also stated in the same letter that "...NRCan does not require a screening level environmental assessment for this authorization...due to the temporary and mobile nature of the facility."

We hope that the above information will provide the reviewers with comfort on this issue. We suggest any further review of this item be continued in the regulatory phase of the project if Cumberland decides to apply for the licence.

In closing, we trust that the additional information provided in responding to Item 3 will provide clarity and resolve any concerns related to the mix-truck.

Yours truly,

CUMBERLAND RESOURCES LTD.

Craig Goodings
Manager, Environmental and Regulatory Affairs