

**MEADOWBANK GOLD PROJECT
FINAL INTERVENOR COMMENTS**

Of

**Meadowbank Mining Corporation
Type “A” Water License Application**

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Prepared By:



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And

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Prepared For:

NUNAVUT WATER BOARD

EXECUTIVE SUMMARY

Nunavut Tunngavik Inc. (NTI) and the Kivalliq Inuit Association (KIA) participated in the technical review meetings for the Meadowbank Mining Corporation Type “A” Water License Application for the proposed Meadowbank Gold Project. These meetings were held on February 26-27, 2008, in Baker Lake, Nunavut, and attended by the various stakeholders and intervenors that had completed technical reviews of the Type “A” Water License Application for the Project. The objective of these meetings was to discuss the technical deficiencies of the Project that were identified as having potentially significant adverse effects on the environment and Project life. The findings of this report are based on discussions and review of the information outlined during the February 26-27 technical review meetings by GeoVector Management Inc. (GeoVector), NTI and KIA Lands staff.

The Project represents an important economic opportunity for the Kivalliq Region and Nunavut. KIA and NTI, on behalf of all Inuit, have actively promoted mining development in Nunavut. Nunavummiut stand to benefit from jobs, training, contracting opportunities and from indirect benefits from the Project related to economic growth in the region.

While KIA and NTI encourage and support responsible mining development which protects the environment, it also has important responsibilities to all Inuit to balance economic development with environmental protection and Inuit lifestyles. ***KIA will support this project if it is developed in an environmentally responsible manner.***

Based on the presentations and discussions held at the technical meetings the areas of concern identified by KIA prior to the meetings were addressed. Commitments were made by MMC to monitor and complete “adaptive engineering” as required based on the results of the monitoring programs for the following specific project components

- Dewatering Dike, Central Dike and Tailings Area Design
- Acid Rock Drainage, Metal Leaching In Waste Rock, Tailings And Water Quality Predictions
- Abandonment& Closure Plan

An independent “dike safety review committee” will be formed to monitor all aspects of dike performance during construction and mine life. This committee must be able to review and comment on all deficiencies found in design, construction material or during operations.

MMC and KIA have successfully signed and are implementing an Inuit Impact and Benefits Agreement (IIBA). Benefits in the form of training and staffing in the short time since the signing of the agreement have positively impacted many of the communities within the Kivalliq Region.

MMC and KIA have successfully negotiated a water compensation agreement pursuant to Article 20 of the Nunavut Land Claims Agreement.

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1.0 Introduction

Nunavut Tunngavik Incorporated (NTI) and the Kivalliq Inuit Association (KIA) are pleased to present findings based on the presentations and discussions held at the February 26-27 technical review meetings. The objective of participating in the technical meetings was to discuss the potential technical deficiencies of the Meadowbank Gold Project that were identified as having potentially significant adverse effects on the environment and project life. These meetings were attended by the various stakeholders and intervenors that had completed technical reviews of the Type “A” Water License Application for the Project.

The findings presented below are based on discussions by GeoVector Management Inc. (GeoVector), NTI and KIA Lands staff during and after the technical review meetings in Baker Lake.

KIA is the Regional Inuit Association (RIA) for the Kivalliq Region of Nunavut. KIA is responsible for the implementation of those parts of the Nunavut Land Claims Agreement (NLCA) assigned directly to the RIA or assigned by the Board of Directors of NTI to KIA as a Designated Inuit Organization (DIO).

KIA represents Inuit beneficiaries of the NLCA in the Kivalliq Region. KIA’s Board members include representatives elected from all of the Kivalliq Communities. KIA is involved in land management because it is the RIA responsible for Inuit owned surface lands in the Kivalliq region pursuant to Article 19 and 21 of the NLCA. KIA is also responsible for the protection and management of water in, on or flowing through Inuit Owned Lands (IOL) pursuant to Article 20 of the NLCA.

Meadowbank Mining Corporation (MMC) is proposing to develop an open pit gold mine approximately 70 km north of Baker Lake. The Project is located on IOL parcel BL-14, with road access intersecting IOL parcel BL-18. The Project will include three separate open pits, water retention dikes, tailings storage, bulk fuel storage, a mill, waste rock storage and other supporting infrastructure. The mine is expected to operate for eight to ten years followed by a decommissioning and closure period.

2.0 Comments from Technical Review Meetings

Based on the presentations and discussions held at the technical meetings, the five (5) areas of concern identified prior to the meetings were addressed in enough detail with commitments made by MMC to monitor and complete “adaptive engineering” as required based on the results of the monitoring programs for the following specific project components:

- Dewatering Dike, Central Dike and Tailings Area Design
- Acid Rock Drainage, Metal Leaching In Waste Rock, Tailings And Water Quality Predictions
- Abandonment& Closure Plan

2.1 Dewatering Dike, Central Dike and Tailings Area Design

An independent “dike safety review committee” will be formed to monitor all aspects of dike performance during construction and mine life. This committee must be able to review and comment on any deficiencies found in design, construction material or during operations. A suggested structure for this committee is:

1. Consist of qualified technical people that are able to view broad issues associated with the dikes without being preoccupied by the day to day operational issues.
2. A quarterly report to all stakeholders that outlines any design changes and “adaptive engineering” that has been implemented during construction and mine life. This reporting should be in both digital and paper form and is required with 10 business days after the end of each reporting quarter.
3. KIA retains the right to place a qualified technical person of their choosing on this committee.

2.2 Acid Rock Drainage, Metal Leaching in Waste Rock, Tailings and Water Quality Predictions

MMC must closely monitor the thermal, seepage and water quality characteristics of the mine waste storage areas. A worst case plan must be prepared for implementation of design changes and “adaptive engineering” if monitoring indicates contaminants are impacting in a negative manner on water quality in any area of the mining operation.

2.3 Abandonment& Closure Plan

KIA feels that the existing plan is sufficient. However, MMC should provide an annual revised abandonment and restoration plan for each year of construction and operation. This updated plan would incorporate design changes and “adaptive engineering” that was required and implemented during construction and operation. These changes would be based on monitoring results collected over the life of the Project to reflect actual site conditions.

3.0 Reclamation and Security

KIA submits that the Nunavut Water Board has the jurisdiction to address security for both land and water which may be affected by the Project. KIA, as the surface owner of IOL upon which the Project will be constructed is entitled to hold security to protect against the possible need to undertake reclamation, should MMC fail in its duty to fully remediate on IOL. KIA acknowledges the Crown’s right to security as well. However, MMC should not be exposed to possible duplication of security.

KIA reviewed reclamation cost estimates prepared by both MMC and the Federal government. In considering these costs and values placed by Inuit for private property, KIA has determined reclamation security as approximately \$43,461,555. This amount is for reclamation of the whole project and includes both land and water related security.

4.0 Conclusion

KIA would like to thank the Nunavut Water Board for allowing us to participate in the review process and we look forward to moving this project into development. KIA also appreciates the cooperation that MMC has provided throughout the environmental assessment and regulatory review process.

APPENDIX A

Comparison On INAC, AEM and GeoVector Security Estimates

