



NTI – P.O. Box 1269, Cambridge Bay, Nunavut, X0B 0C0, Tel: (867) 983-5600, Fax: (867) 983-5624

KIA- P.O. Box 340, Rankin Inlet, Nunavut, X0C 0G0, Tel: (867) 645-2800, Fax: (867) 645-3855

March 31, 2015

Phyllis Beaulieu
Manager of Licensing
Nunavut Water Board
Gjoa Haven, NU
X0E 1J0

Dear Phyllis Beaulieu:

Re: Kivalliq Inuit Association Intervener Submission for 2AM-MEA0815 Meadowbank Water License Renewal Application Public Hearing Process

The Kivalliq Inuit Association (KIA) has prepared the following final written submission for the Meadowbank Mine Water License Renewal. Our submission includes the appended letter report prepared by Hutchinson Environmental Sciences Ltd. (HESL) dated March 30, 2015.

We also provide the following comments regarding financial security:

The KIA is in agreement with the financial security management cost recommendation of \$86,519,614 prepared by Golder Associates Ltd. dated December 2, 2014 (Project No:1411866). This recommendation was generated for the permanent closure of the Meadowbank Gold Project using RECLAIM Version 7.0. We request that total reclamation liability for the Meadowbank Mine Project is held under two instruments:

1. Kivalliq Inuit Association Commercial Land Lease (50% of the total security); and
2. The Water License, to be held by the Minister of AANDC (50% of total security).

We have recommended equal distribution of liability between the Minister and the KIA as per the meeting held between KIA, their consultants (HESL and GeoVector Management Inc.), and AANDC representatives on March 27, 2015. Equal distribution has been recommended as:

1. The Meadowbank Mine Project is fully on Inuit Owned Land (IOL),
2. The KIA's mandate requires the use of security for purposes above and beyond the reclamation of the affected water resource. IOL is subject to multiple federal jurisdictions and it is the KIA's responsibility to ensure adequate restoration under all applicable regulations.
3. The KIA requires sufficient funds to ensure the entire production lease is enforced. The KIA express concern that funds held by the Minister of AANDC need not apply to the entire production lease, only that portion which applies directly to the water resource.


Even distribution of liability and associated funds between the KIA and AANDC as recommended here is an equitable allocation of risk and responsibility.

Further to this assertion, the KIA confirms that, on March 27, 2015, KIA and AEM executed a Water Compensation Amending Agreement, which includes compensation in relation to the following changes to the Meadowbank Project:

- a) Expanded Portage tailings storage facility;
- b) Expanded Portage waste rock storage facility;
- c) Airport runway expansion;
- d) Vault dyke addition;
- e) Loss of Vault Lake with Vault open pit;
- f) Addition of the Vault waste rock storage facility; and
- g) Inclusion of additional funds for environmental monitoring costs.

Should you have any questions regarding our appended final review of the water license renewal application or this proposed distribution of security holdings, please do not hesitate to contact the undersigned.

Sincerely,
Kivalliq Inuit Association.



Luis G. Manzo P, Ag.

Director of Lands

Phone: (867) 645-5731

Fax: (867) 645-3855

E-mail: lmanzo@kivalliqinuit.ca

CC: Meghan Porter (Licensing Administrative Assistant)

