

5 March 2010

Ms. Stephanie Autut Executive Director Nunavut Impact Review Board P.O. Box 1360 Cambridge Bay, NU XOB OCO KIA File Number: to follow



RE: Meliadine Gold Project: Comaplex Minerals Corporation: Part 5 Review

Dear Ms. Autut,

Comaplex Minerals Corporation (Comaplex) is proposing to construct and operate a gold mine, known as the Meliadine Gold Project (Project) 25 km north of Rankin Inlet and 80 km south of Chesterfield Inlet in the Kivalliq Region of Nunavut. The proposed Project site is located on Inuit Owned Land in an area that has not undergone any previous mining or industrial development. The Project is over 400 km north of the tree line and is 285 km southeast of the nearest active, large-scale industrial development, the Meadowbank Gold Mine.

The Meliadine Gold Project will use standard, widely accepted open pit and underground mining methods to access and extract gold bearing rock and will use conventional milling methods to release the gold from the host rock.

The proposed Project would be linked to Rankin Inlet by a 27.4 km long all-season road. This road will provide access for workers and contractors to the mine and for the delivery of supplies. The proposed Project would use existing infrastructure in the Hamlet as much as possible, but only to the extent that the normal long term, day-to-day operation of the town is not impacted. Such infrastructure would include the barge off-loading area (Itivia), the airport, the existing dock, and the services and/or facilities of various local businesses. Additional off-site mine infrastructure such as a tank farm, lay-down area, and warehousing will need to be constructed in or near the town. These would be company built or leased from local entrepreneurs.

The combination of the Project going ahead and the use of the Hamlet's infrastructure, labour force and businesses will have a profound socioeconomic impact on Rankin Inlet and, to a lesser extent, on other Kivalliq communities. As with all projects of this type, environmental impacts can be significant unless appropriate mitigation and preventative measures are identified and implemented at all stages of the Project. Technical knowledge from government departments, other agencies and interveners, combined with Inuit Qaujimajatuqangit can provide insight on how to recognise adverse effects and how they might be controlled, reduced or eliminated. This is a central benefit of an environmental assessment process and can lead to improvements in the design and operation of our proposed Project.

We view the environmental assessment process in part as a forum for the interchange of information, particularly for the Inuit who have a strong tradition of oral communication in decision making and reaching consensus. With the NIRB facilitating community and technical

meetings, and holding public hearings as part of the process, Comaplex and other parties can exchange information and opinions concerning the Project's environmental and socio-economic effects. We recognise that the Project has to sustain and protect the environment, Inuit culture and traditions while at the same time providing benefits and long term sustainable jobs to the Kivalliq region.

Due to the nature and size of the proposed Project and the necessary scrutiny that such projects require, Comaplex believes a Part 5 review, as referenced in Article 12 of the Nunavut Land Claims Agreement, is required and requests the Nunavut Impact Review Board undertake such a review of the Meliadine Gold Project.

Furthermore, Comaplex supports the Coordinated Framework approach to the regulatory process at the time. While details are not yet clearly understood on how exactly this coordinated process will take place, we feel the early participation of the Nunavut Water Board enhances the overall process. The technical support of the NWB to the NIRB should clarify and help resolve technical issues that might arise throughout the EA process, some of which would be relevant to the regulatory process as it moves forward.

As you will note in section 2.2.2 of the attached Preliminary Project Description, Comaplex has highlighted the pre-development of an all-season road between Rankin Inlet and the proposed mine site as a high priority. If, for whatever reason, the road was built and the proposed Project was not to go ahead, the road by itself would still be viable and would see wide spread use by the residents of Rankin Inlet and could form an integral part of road infrastructure for the Kivalliq region. Comaplex is already working with Nunavut's Department of Economic Development and Transportation to design the road and bridges to a level consistent with both the mine's operations and to standards required for a potential future all-season road between Rankin Inlet and Chesterfield Inlet. We have also undertaken with the Hamlet of Rankin Inlet and the Department of Economic Development and Transportation to try to access Federal Infrastructure Grants to build the Meliadine River bridge in the near term. There is very strong community support for such a bridge and approach road.

It is understood the review process and the subsequent regulatory process will take a certain length of time to complete. During the interim, Comaplex as sole owner of the Meliadine Gold Project will continue its exploration activities on the mineral claims shown in Figure 1-1 of the attached Preliminary Project Description. The exploration will serve two purposes: to find new mineral resources and to confirm known mineral resources. For the latter, this will involve diamond drilling from the surface as well as underground exploration where the existing decline will be advanced to ore lodes found at greater depth. Both surface drilling and underground exploration are necessary to increase certainty in the mineral resources and proposed future mining methods.

Although the larger part of the biophysical baseline information has been collected, we will be undertaking a socio-economic and IQ baseline collection program in 2010 for inclusion in the draft EIS. As well, we will be continuing collection of geotechnical information in the vicinity of the ore deposits, within Rankin Inlet where various mine infrastructure is proposed, and along

the proposed all-season road from Rankin Inlet to the proposed mine site and along the proposed spur roads to the F Zone and Discovery gold deposits.

Lastly, while baseline archaeology is felt to be sufficient for the purposes of the draft EIS, there are a number of sites where mitigation will be undertaken this summer. Most of the sites are located where the proposed bridge will cross the Meliadine River while two sites are within the footprint of the proposed Tiriganiaq open pit. Adaptive management is being applied at this point to safeguard these heritage resources and to ensure that no archaeology information is lost should the sites be inadvertently disturbed.

In closing, Comaplex looks forward to working with the Nunavut Impact Review Board in advancing the Meliadine Gold Project from exploration to an operating gold mine benefiting the Kivalliq Region, Nunavut, and Canada.

Should you have any questions or concerns with our submission, please do not hesitate in calling me or John Witteman at 403 265 2846 or JWitteman@Comaplex.com.

Yours sincerely,

Mark Balog

Chief Operating Officer
Comaplex Minerals Corp.

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