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April 2, 2012

NRCan File #NT-056
NIRB File No. 08MN053

Amanda Hanson
Director, Technical Services
Nunavut Impact Review Board
29 Mitik, PO Box 1360
Cambridge Bay, Nunavut X0B 0C0

Sent via email: info@nirb.ca

**Subject: Natural Resources Canada's (NRCan) Information Requests
regarding the Final Environmental Impact Statement (FEIS) for the
Baffinland Iron Mine Corporation's proposed Mary River Project**

In response to your February 29, 2012 letter indicating the Acceptance of the Final EIS and Next Steps in the Nunavut Impact Review Board's (NIRB) Review and the Nunavut Water Board's (NWB) Water Licensing Process for Baffinland Iron Mines Corp's Mary River Project, Natural Resources Canada staff has reviewed the Final EIS and Nunavut Water Board Licence Application. NRCan is providing the attached Information Requests directed to the proponent, regarding acid rock drainage and metal leaching.

If you have any questions concerning our comments, or if I may be of further assistance, please call me at (613) 943-0773.

Sincerely,

Original signed by

John Clarke
Director
Environmental Assessment Division
Science and Policy Integration
Natural Resources Canada

cc: Rob Johnstone, Minerals and Metals Sector, NRCan



Reviewer #: 1

Areas of Expertise: Acid Rock Drainage and metal leaching

Documents Reviewed:

Final Environmental Impact Statement (FEIS). Volume 6, Terrestrial Environment, FEIS, Volume 6, Appendix 6B-1
NWB Type A Water Licence Application. Attachment 5, Annex 3: *Waste Rock Geological and Geochemical Characterization Program, Mary River Project* “(2012) Appendix 6B. Geochemical Evaluations. Appendix 6B-1 Interim Mine Rock ML/ARD report, Mary River project

Information Request#:1

Issue: NRCan notes that a report regarding the Railway to Steensby Inlet is missing.

Reference:

Final Environmental Impact Statement (FEIS). Volume 6, Terrestrial Environment, Section 2. page 26, references page 179

Rationale:

A screening level assessment for Metal Leaching /Acid Rock Drainage (ML/ARD) was completed that indicated a low potential for ML/ARD coupled with low neutralizing potential. This warranted additional testing. Further geochemical testing at quarry site and additional selected core samples are to be provided in this report (as cited in the FEIS Hatch 2011a.)

Request:

NRCan requests that the proponent provide the report cited as:

Hatch 2011a “Mary River Project – 2011 Potential Quarry and Borrow Investigations”, Report No. H337697-7000-10-124-0001, Nov. 21, 2011.

Information Request#:2 (Comment #1 to Nunavut Water Board)

Issue: There is missing information regarding management of Potential Acid Generating (PAG) waste rock, specifically Segregation of PAG and non-PAG material.

Reference:

References: FEIS, Volume 6, Appendix 6B-1

Rationale:

The PAG waste rock and waste overburden are to be encapsulated within the waste rock pile with progressive encapsulation of the PAG waste rock and overburden within the chemically and physically stable non-PAG waste rock. The strategy is that the PAG core material will be permanently frozen.



Request:

Further information is requested on the segregation criteria for PAG and non-PAG. The FEIS notes that additional geochemical studies are underway to better understand the kinetics of potential acid leaching behaviour, and to refine the expected drainage quality and metal leaching behaviour from materials. However, this information should be provided for evaluation of the waste rock management plan.