



Aboriginal Affairs and
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Baffinland Iron Mines Corporation Mary River Project Type “A” Amendment Application

Nunavut Water Board Technical Meeting & Pre-Hearing Conference
Teleconference
January 28, 2015

Canada 



Presentation Outline

1. Role and Responsibilities
2. Contributions to the Water Licence Review
3. Technical Review Comments
4. Other Water Licensing Considerations
5. Conclusion



Role and Responsibilities

The department's responsibilities, mandate and obligations stem from the following applicable laws and policies:

- *Department of Indian Affairs and Northern Development Act*
- *Nunavut Land Claims Agreement Act*
- *Nunavut Waters and Nunavut Surface Rights Tribunal Act* and the associated regulations
- *Territorial Lands Act* and the associated regulations
- Mine Site Reclamation Policy for Nunavut



Contributions to the Review

- Completeness review of the application
(September 19, 2014)
- Technical review of the application
(November 14, 2014)
- Review of the Interim Closure and Reclamation Plan
(September 15, 2014)
- Review of the Aquatic Effects Monitoring Plan
(November 14, 2014)
- Participation in the 2015-16 Annual Security Review
(November 2014 to January 2015)



Technical Review Comments

Technical comments and recommendations regarding the water licence application were presented in the Technical Review submission dated November 14, 2014 under the following headings:

2.1 Monitoring of Milne Port Ore Stockpile Runoff Ponds

2.2 Design of Milne Port Ore Stockpile Runoff Ponds

2.3 Interim Closure and Reclamation Plan and Security Estimate



Technical Review Comments

2.1 Monitoring of Milne Port Ore Stockpile Runoff Ponds

AANDC Recommendation

AANDC requested that the amended water licence clearly identify where compliance with the proposed discharge limits for the Milne Port ore stockpile runoff will be established (i.e., where a monitoring station will be established to isolate treated ore stockpile runoff quality). This new monitoring station should also be included in the updated plans (Fresh Water Supply, Sewage, and Wastewater Management Plan and the Aquatic Effects Monitoring Plan).



Technical Review Comments

2.1 Monitoring of Milne Port Ore Stockpile Runoff Ponds

Baffinland Response

The discharge location for the sewage effluent will remain separate from the ore stockpile drainage. Two separate monitoring locations will be upstream from the ocean. The locations are accurately depicted in the Milne Port Site Layout in Attachment 1 of the application but exact locations will be finalized with AANDC Inspectors.

Status

Resolved. AANDC recommends that commitments are addressed in the licence and that plans are updated to include all monitoring locations.



Technical Review Comments

2.2 Design of Milne Port Ore Stockpile Runoff Ponds

AANDC Recommendation

AANDC requests additional clarification from Baffinland on how the run-off coefficient design criterion of 0.0 was applied in the design of the Milne Port ore stockpile runoff sedimentation ponds and what method is proposed to discharge the stockpile runoff from the ponds to the receiving waters.



Technical Review Comments

2.2 Design of Milne Port Ore Stockpile Runoff Ponds

Baffinland Response

Baffinland used a runoff coefficient of 0.0 for the ore stockpile area and 0.9 for the remaining pad areas as per the civil design criteria. Regarding the discharge of the stockpiles, Baffinland provided emergency overflow weirs with rip-rap at the ponds outlets.

Status

Resolved. AANDC recommends that relevant plans are updated to include the additional information.



Technical Review Comments

2.3 Interim Closure and Reclamation Plan and Security Estimate

AANDC Recommendation

AANDC recommends that the deficiencies in the final and marginal security cost estimates be addressed as part of the 2015-16 Annual Security Review (ASR). Some of these deficiencies include:

- The final closure estimate of \$518,711,208 does not include the Early Revenue Phase (ERP).
- The final closure cost estimate for Milne Inlet of \$7,311,986 does not include all facilities associated with the ERP.
- The 2014 estimate (Attachment 4) does not include the agreed upon increases in security based on changes to assumptions related to explosives liability and Jet-A fuel tank reclamation.



Technical Review Comments

2.3 Interim Closure and Reclamation Plan and Security Estimate

Baffinland Response

Baffinland recognizes an annual adjustment to reclamation security (or Annual Security Review) is required under Section 9.2 of the Commercial Lease, No. Q13C301, agreed to between Baffinland Iron Mines Corporation (Baffinland) and the Qikiqtani Inuit Association (QIA), as well as a requirement under the Type 'A' Water Licence 2AM-MRY1325 (Part J, Item 3).

Status

Ongoing. Issues are being addressed in the 2015 reclamation plan estimates and will be finalized through the ASR process.



Other Water Licensing Considerations

Comments on Proposed Updates to Water Licence 2AM-MRY1325

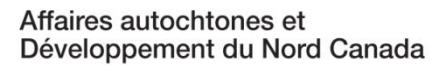
AANDC submitted comments on proposed updates to the water licence in Appendix 2 of the AANDC Technical Submission (November 14, 2014). Some comments pertain to:

- Licence term
- Different levels of activity and water use during the operation phase (ERP and rail haul)
- Definitions (recycled water, operations, care and maintenance, etc.)
- Inclusion of ore stockpile runoff ponds at Milne Port



Conclusion

- AANDC is satisfied with Baffinland's responses to our technical review comments and recommendations.
- Commitments need to be addressed in the amended water licence.
- AANDC will continue to work through the water licence application review process with the aim of protecting Nunavut's freshwater resources.



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