



Water Resources
Nunavut Regional Office
P.O. Box 100
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March 18, 2016

Robin Ikkutisluk
Licensing Administrator
Nunavut Water Board
P.O. Box 119
Gjoa Haven, NU, X0A 1J0

Your file - Votre référence
2AM-MRY1325

Our file - Notre référence
CIDM#1039797

**Re: 2AM-MRY1325 – Mary River Project – Baffinland Iron Mines Corporation –
Quarry Management Plan Tote Road Quarry Q18**

Dear Ms. Ikkutisluk,

Thank you for your February 18, 2016 invitation for written representations on the above referenced management plan.

Indigenous and Northern Affairs Canada (INAC) has conducted a technical review of the Quarry Management Plan Tote Road Quarry Q18 submitted by Baffinland Iron Mines Corporation and the results of our review are presented in the attached memorandum for the Nunavut Water Board's consideration.

Comments have been provided pursuant to INAC's mandated responsibilities under the *Nunavut Waters and Nunavut Surface Rights Tribunal Act* and the *Department of Indian Affairs and Northern Development Act*.

INAC appreciates the opportunity to participate in this review. If there are any questions or concerns, please contact me at (867) 975-3876 or by e-mail at sarah.forte@aandc-aadnc.gc.ca.

Sincerely,

Sarah Forté
Water Management Coordinator

cc. Scott Burgess, Manager, Mary River Project Team, INAC
Erik Allain, Manager of Field Operations, INAC
Justin Hack, Water Resources Officer, INAC

Technical Review Memorandum

To: Robin Ikkutisluk, Licensing Administrator, Nunavut Water Board

From: Sarah Forté, Water Management Coordinator, Water Resources Division, INAC

Date: March 18, 2016

Re: Review of Baffinland Iron Mines Corporation's Quarry Management Plan Tote Road Quarry Q18 for Type A Water Licence #2AM-MRY1325

Applicant: Baffinland Iron Mines Corporation
Project: Mary River Project
Region: Qikiqtani

A. BACKGROUND

On February 18, 2016, the Nunavut Water Board (NWB or Board) provided notification of Baffinland Iron Mines Corporation's (the licensee or Baffinland) submission of a Quarry Management Plan for Tote Road Quarry Q18 (BAF-PH1-830-P16-0045 Rev 0), dated February 11, 2016.

The Q18 quarry management plan is for the quarry located at km 61.5 of the Tote Road at the Mary River Project. This management plan is a requirement under project certificate #005 amendment 1 and water licence 2AM-MRY1325 amendment 1 as the quarry volume will exceed 1000 m³. It describes the activities and measures to be taken during quarrying to ensure best practises are followed to protect workers, wildlife and water resources.

The NWB requested interested parties review the plan and make representations by March 18, 2016.

B. RESULTS OF REVIEW

Indigenous and Northern Affairs Canada (INAC) has only one minor comment on something which is unlikely to have an impact on water and has noted a few mistakes which appear to be typos.

1. Trigger for dust monitoring

Reference:

- Quarry Management Plan Tote Road Quarry Q18 (BAF-PH1-830-P16-0045 Rev 0), February 11, 2016, Section 3.3.4

Comment:

The section on dust management includes measures to be taken in order to reduce dust. It also includes the statement “*Dust monitoring could include sampling for fugitive dust by means of dust collectors which are currently located in a systemic fashion throughout the project area.*”

The conditions under which dust monitoring will occur are not defined and it is not clear if dust collectors currently located throughout the project area are expected to adequately measure a signal from quarry Q18 or if they would be moved near quarry Q18.

Recommendation:

INAC recommends that the licensee define what would trigger dust monitoring and clarify how it would be done.

2. Possible typos

Reference:

- Quarry Management Plan Tote Road Quarry Q18 (BAF-PH1-830-P16-0045 Rev 0), February 11, 2016

Comment:

The following mistakes which appear to be typos have been noted:

- Page 6, Paragraph 2: *The surface topography of the area slopes from east to waste* ... It seems likely this should be west.
- Page 11, Paragraph 7: *Best management practises for quarry operations will be followed for the Mary River Tote Road Quarry (Q15).* Everywhere else this quarry is referred to as Q18.
- Page 15, Header 4.2: **WATER DISPOSAL** This subsection addresses waste disposal and according to the rest of the plan, water disposal should not be necessary.