



September 4, 2020

Assol Kubeisinova
Technical Advisor, NWB
P.O. Box 119
Gjoa Haven, NU X0B 1J0

**RE: Baffinland Response to Comments
2019 QIA & NWB Annual Report for Operations
Mary River Project, Type 'A' Water Licence - 2AM-MRY1325 - Amend. No. 1**

Baffinland Iron Mines Corporation (Baffinland) has reviewed the comments and recommendations received from the Nunavut Water Board (NWB)¹, Crown Indigenous Relations and Northern Affairs Canada (CIRNAC)² and Environment and Climate Change Canada (ECCC)³ in regard to Baffinland's 2019 QIA & NWB Annual Report for Operations.

Baffinland thanks all parties for their comments and reviews of the 2019 QIA & NWB Annual Report for Operations. Baffinland's responses to the comments required by September 4, 2020 are provided in Attachment 1 of this letter. Remaining comments will be addressed within the timeline established by the NWB.

Please do not hesitate to contact the undersigned should you have any remaining questions or comments.

Regards,

A handwritten signature in black ink, appearing to read "Christopher Murray".

Christopher Murray
Environmental & Regulatory Compliance Manager

Attachments:

Attachment 1: Baffinland Response to Comments

Cc: Karén Kharatyan (NWB)
Chris Spencer, Jared Ottenhof (QIA)
Bridget Campbell, Godwin Okonkwo (CIRNAC)
Gabriel Bernard-Lacaille, Anna Graham, Anne Wilson (ECCC)
Megan Lord-Hoyle, Lou Kamermans, Tim Sewell, Shawn Stevens, Connor Devereaux, Aaron MacDonell,
Amanda McKenzie (Baffinland)

¹ NWB (2020) Re: Licence No: 2AM-MRY1325 Type "A"; Mary River Project, Baffinland Iron Mines Corporation; 2019 Annual Report Review. Letter dated Aug 28, 2020

² CIRNAC (2020) Re: Crown-Indigenous Relations and Northern Affairs Canada Review Comments on the 2019 Annual Report for the Mary River Project, Water Licence No. 2AM-MRY1325 – Amendment No. 1. Letter dated July 24, 2020

³ ECCC (2020) RE: 2AM-MRY1325 – Baffinland Iron Mine Corporation – Mary River – 2019 Annual Report. Letter dated August 29, 2020

Attachment 1

Baffinland Response to Comments

Table 1-1: Baffinland Responses to 2019 QIA-NWB Annual Report for Operations

No.	Intervener Recommendation / Concern	Baffinland Response	Due Date Assigned by NWB
ECCC Comment 2	Provide a discussion on whether monitoring in the vicinity of MP-C-G is still warranted, and whether the SNP Station should be relocated, rather than discontinued.	<p>In Appendix E-13 of the QIA-NWB Type A Annual Report for Operations, Baffinland proposed the removal of station MP-C-G at Milne Port, which originally captured surface discharge downstream of the construction area at Milne Port. In August 2019, Baffinland received approval for the Modification Request No. 12 Expansion of the Milne Port Ore Stockpile and Water Management, to optimize stockpiling and ship loading operations, resulting in an additional 140,000 m² of stockpile area and a new 15,000 m² lined sedimentation pond. Following approval, Baffinland proceeded with Stage 1 of the Ore Stockpile expansion, which resulted in the removal of Station MP-C-G. This station no longer captures surface discharge downstream of construction due to the expansion of the Ore Pad at Milne Port. Furthermore, based on the Ore Stockpile Expansion, Station MP-C-B was relocated to a new location which captures the water that flows south of the ore pad. This was included in in Appendix E-13 of the QIA-NWB Type A Annual Report for Operations.</p> <p>As part of the package submitted and approved under Water Licence Modification No. 12, Baffinland prepared a Storm Water Management Plan for Stockpile No. 1, Stage 1 Expansion. This document details the Stage 1 earthworks and storm water drainage implemented for the expansion of Stockpile No 1 constructed in 2019. Effluent that would have originally been captured at MP-C-G, is now being directed in a newly constructed ditch and conveyed to Pond No. 3, where it can be collected and tested for compliance with Baffinland's Type A Water Licence. Thus, the removal and not relocation of station MP-C-G is proposed.</p>	September 4, 2020

