



ᖃᖃᖃᖃᖃᖃᖃ
ᖃᖃᖃᖃᖃᖃᖃᖃᖃ

Serving the
communities of

ᖃᖃᖃᖃᖃᖃᖃᖃ
Arctic Bay

ᖃᖃᖃᖃᖃᖃᖃᖃ
Cape Dorset

ᖃᖃᖃᖃᖃᖃᖃᖃᖃ
Clyde River

ᖃᖃᖃᖃᖃᖃᖃᖃᖃ
Grise Fiord

ᖃᖃᖃᖃᖃᖃᖃᖃ
Hall Beach

ᖃᖃᖃᖃᖃᖃᖃᖃ
Igloolik

ᖃᖃᖃᖃᖃᖃᖃᖃ
Iqaluit

ᖃᖃᖃᖃᖃᖃᖃᖃ
Kimmirut

ᖃᖃᖃᖃᖃᖃᖃᖃᖃ
Pangnirtung

ᖃᖃᖃᖃᖃᖃᖃᖃᖃ
Pond Inlet

ᖃᖃᖃᖃᖃᖃᖃᖃᖃ
Qikiqtarjuaq

ᖃᖃᖃᖃᖃᖃᖃᖃᖃ
Resolute Bay

ᖃᖃᖃᖃᖃᖃᖃᖃᖃ
Sanikiluaq

Assol Kubeisinova
Technical Advisor, Nunavut Water Board
P.O. Box 119
Gjoa Haven, Nunavut
X0B 1J0

November 8, 2018

RE: NWB Request for Comments on the Timing and Process for the Mary River Project Annual Security Review associated with the 2019 Work Plan under Part C and Schedule C of Type "A" Water Licence 2AM-MRY1325

Dear Assol Kubeisinova,

The Qikiqtani Inuit Association (QIA) submits this letter in response to the Nunavut Water Board's (NWB's) letter of November 2, 2018¹. In the Letter, the NWB requested that interested parties provide comments with respect to the 2019 Annual Security Review (ASR) process and the proposed timelines of activities associated with the NWB's conduct of the ASR by 12:00 pm MST. November 9, 2018.

QIA's primary intention is to fulfill the requirements of the QIA and Baffinland Iron Mines Corporation (Baffinland) signed Commercial Lease No. Q13C301² (the Lease) which stipulates the following:

1. Proponent's submission of a Work Plan, on/before November 1st
2. QIA filing of a security review with the proponent, on/before December 31st
3. Proponent's posting of security adjustments with QIA, on/before January 31st

QIA is currently working to provide Information Requests for the Mary River Project Phase 2 application that is currently before the NWB, resulting in limited resources for QIA. As a result, QIA is requesting that some dates be adjusted in the proposed 2019 ASR proposed timelines following the changes highlighted in red in the attached Table.

¹ NWB (2018). Licence No. 2AM-MRY1325 Type "A"; Mary River Project, Baffinland Iron Mines Corporation, Process Guidance Annual Security Review Associated with 2019 Work Plan.

² QIA and BIMC (2013). Commercial Lease No.: Q13C301. September 6, 2013.



ᖃᖃᖃᖃᖃᖃᖃ
ᖃᖃᖃᖃᖃᖃᖃᖃᖃ

Serving the
communities of

ᖃᖃᖃᖃᖃᖃᖃᖃ
Arctic Bay

ᖃᖃᖃᖃᖃᖃᖃ
Cape Dorset

ᖃᖃᖃᖃᖃᖃᖃᖃᖃ
Clyde River

ᖃᖃᖃᖃᖃᖃᖃᖃ
Grise Fiord

ᖃᖃᖃᖃᖃᖃ
Hall Beach

ᖃᖃᖃᖃᖃᖃ
Igloolik

ᖃᖃᖃᖃᖃᖃᖃ
Iqaluit

ᖃᖃᖃᖃᖃᖃ
Kimmirut

ᖃᖃᖃᖃᖃᖃᖃᖃ
Pangnirtung

ᖃᖃᖃᖃᖃᖃᖃᖃ
Pond Inlet

ᖃᖃᖃᖃᖃᖃᖃᖃᖃ
Qikiqtarjuaq

ᖃᖃᖃᖃᖃᖃᖃᖃᖃ
Resolute Bay

ᖃᖃᖃᖃᖃᖃᖃᖃ
Sanikiluaq

Should you have any comments or concerns, please contact the undersigned.

Regards,

Fai Ndofor
Regulatory Manager

Attachment: QIA Proposed 2018 ASR Process

CC-Mr. Christopher Murray, Baffinland Iron Mines Corporation
-Mr. Wajid Daouda, P.Eng., Public Works and Procurement Canada

QIA Proposed 2019 ASR

Date	Event
November 2, 2018	The Licensee filed a copy of its 2019 Work Plan as required under Schedule J of the Licence.
November 9, 2018	The Licensee, Crown-Indigenous Relation and Northern Affairs Canada (CIRNAC), and the Qikiqtani Inuit Association (QIA) shall provide comments with respect to the ASR process and timelines proposed in this Table.
November 30, 2018	CIRNAC, the QIA and any other interested parties to file written submissions regarding the Licensee's 2019 Work Plan and any update to the reclamation security estimates for the Project.
December 7, 2018	Licensee to file any updated information regarding additional security amounts posted with the QIA and territorial or federal authorities that have issued authorizations to the Project, including CIRNAC.
	Licensee to file its response(s) to interveners' submissions regarding reclamation security associated with the 2019 Work Plan.
December 12, 2018	NWB to hold a teleconference regarding the ASR associated with the 2019 Work Plan.
December 19, 2018	All involved parties file updates and/or addenda to the intervenor submissions (filed by November 30, 2018) and Licensee submissions (filed by December 7, 2018) based on the discussion and commitments at the teleconference.
January 18, 2019	NWB to issue an ASR decision that advises the Licensee and interested parties of the total financial security required to be posted prior to commencement of the 2019 Work Plan under Part C, Item 1 of the Licence.
February 17, 2019	Licensee to file any additional reclamation security amount required as determined by the NWB and set out in the ASR decision in accordance with Part C, Item 1 of Licence No. 2AM- MRY1325.