



30 December 2019

Assol Kubeisinova
Nunavut Water Board
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**Re: Responses to Intervener Submissions and Updated 2020 Work Plan Scope of Work
2020 Work Plan Annual Security Review
Mary River Project, Type A Water Licence No. 2AM-MRY1325**

Baffinland Iron Mines Corporation (Baffinland) provides the following letter to the Nunavut Water Board (NWB) in response to the intervener submissions received from Crown Indigenous Relations and Northern Affairs Canada (CIRNAC)¹ and the Qikiqtani Inuit Association (QIA)², in regards to the 2019 Annual Security Review (ASR) for the Mary River Project (the Project) Type 'A' Water Licence No. 2AM-MRY1325 (as amended). Where applicable, Baffinland has provided responses to intervener questions to clarify or revise the position presented by Baffinland in the 2020 Marginal Closure and Reclamation Financial Security Estimate³ (2020 Security Estimate). Where possible Baffinland has attempted to clarify discrepancies between the estimates prepared by interveners and the 2020 Security Estimate. Additionally, Baffinland has provided clarifications on the scope of the 2020 Work Plan and the requested confirmation to the NWB on the total value of reclamation security currently posted for the Mary River Project.

Revised 2020 Work Plan Scope of Work

As a result of the adjournment of the Phase 2 public hearing and the uncertainty associated with the timeline for the hearing to resume, and the subsequent impact to Baffinland's financial position, the Company must adjust the scope of work and forecast for the 2020 sealift in the 2020 Work Plan. The revised 2020 Work Plan and the associated 2020 Marginal Closure and Reclamation Financial Security Estimate will be provided following the 2020 ASR teleconference to ensure all intervenor comments and concerns are addressed in the revised versions issued. A draft version of the amended Table 3-1 and Table 8-2 from the 2020 Work Plan are provided as Attachment 1 to this letter, and are intended to provide the NWB and intervenors advance notice of the revised scope of work that will be presented, and to facilitate any necessary discussion during the 2020 ASR teleconference.

¹ CIRNAC (2019). Re: Crown-Indigenous Relations and Northern Affairs Canada's Reclamation Cost Estimate for the 2020 Annual Security Review for Baffinland Iron Mines Corporation's Mary River Project, Water Licence 2AM-MRY1325 Amendment No. 1. 13 December 2019

² QIA (2019) Re: Licence No. 2AM-MRY1325 Type "A"; Mary River Project, Baffinland Iron Mines Corporation, Annual Security Review Associated with 2020 Work Plan. 13 December 2019

³ Baffinland (2019a) 2020 Marginal Closure and Reclamation Financial Security Estimate. 1 November 2019

Confirmation of Reclamation Security Values Currently Held

The total value of reclamation security currently held for the Mary River Project is provided in the below table. Baffinland notes an omission in the 2020 Security Estimate Table 4-1 regarding the current value of security held by Fisheries and Oceans Canada (DFO) under current Fisheries Act Authorizations, however this does not have a material impact on the securities held under the Type 'A' Water Licence 2AM-MRY1325, and is provided herein for completeness. There were no addendums to the Work Plan issued in 2019.

	Authorization	Liability	Total Value of Reclamation Security Currently Posted
			(\$)
1	Type A 2AM-MRY1325	IOL ²	104,687,658
2		Crown	1,448,801
3		Water	-
4		Land	-
5	<i>Subtotal Type A</i>		106,136,459
6	Type B Exploration 2BE-MRY1421	IOL ²	-
7		Crown	1,250,000
8		Water	-
9		Land	-
10	<i>Subtotal Type B Exploration</i>		1,250,000
11	DFO Security Associated with Ore Dock	IOL ²	-
12		Crown	563,000
13		Water	563,000
14		Land	-
15	DFO Security Associated with Freight Dock	IOL ²	-
16		Crown	4,250,000
17		Water	4,250,000
18		Land	-
19	<i>Subtotal DFO</i>		4,813,000
20	AANDC Land Lease 47H/16-1-2	IOL ²	-
21		Crown	4,975,000
22		Water	-
23		Land	4,975,000
24	<i>Subtotal AANDC Land Lease</i>		4,975,000
25	GRAND TOTAL		117,174,459

In 2019, Baffinland and QIA entered into an arbitration process regarding the value of reclamation security associated with the 2019 Work Plan. As the arbitration process has yet to conclude, the value of reclamation security held by QIA in respect of the Commercial Lease Q13C301 is subject to change. Baffinland remains committed to resolving this matter in a timely fashion and gaining alignment with QIA.

Crown Indigenous Relations and Northern Affairs Canada Estimate

The submission provided by CIRNAC included both an estimate of the reclamation security for the 2020 Work Plan prepared by SNC-Lavalin Group⁴ (SNC) dated December 12, 2019, as well as an estimate for the Phase 2 proposal currently under review for an amendment to the Type 'A' Water Licence 2AM-MRY1325, prepared by Arcadis Canada Inc.⁵ (Arcadis) dated July 15, 2019.

Baffinland has not reviewed the document prepared by Arcadis for the Phase 2 proposal in detail as this is outside the scope of the 2020 Annual Security Review process. It is noted however that the total value of the reclamation security estimate put forward by Arcadis differs significantly from the value published by CIRNAC in their July 15, 2019 technical review⁶ of the Phase 2 Amendment application. Baffinland requests that CIRNAC clarify this discrepancy through the Phase 2 proposal review process in advance of technical meetings for the Water Licence amendment.

Baffinland has provided the below responses to the recommendations outlined by CIRNAC in their December 13, 2019 submission. A general comment regarding the SNC estimate is that it fails to take into account the unit rate updates completed in 2018, and validated by SNC⁷ during the 2019 ASR. This has resulted in a number of review questions posed to Baffinland that were addressed in full during the 2019 ASR, as well as an overestimation of the value of reclamation security associated with the 2020 Work Plan. Baffinland requests that CIRNAC issue a revised estimate for 2020 in consideration of the unit rate updates used by CIRNAC in the 2019 ASR.

CIRNAC Recommendation	Baffinland Response
<p>Based on the materials provided by BIMC, and CIRNAC review, CIRNAC is of the opinion that a security of \$146,893,961 would ensure that the project is secured for the peak projected reclamation costs for 2020, including those Phase 2 items BIMC proposes for 2020. A security of \$180,389,874 would ensure that the project is secured for the peak projected reclamation costs including all Phase 2 cost, but excluding 2020 work plan items for the currently approved project. If BIMC provides a separation in EBS of 2020 work plan items approved under the current project from those for Phase 2, CIRNAC could better prepare an estimate which would cover all items inclusive of the 2020 work plan and Phase 2.</p> <p>Presently CIRNAC holds \$1,448,801 in financial security for reclamation purposes. CIRNAC recommends that an additional \$1,764,129 be added to the amount already</p>	<p>Baffinland requests that CIRNAC provide an updated estimate for 2020 respecting the unit rate updates completed in 2018 and validated by SNC.</p> <p>Baffinland will be required to update the Phase 2 estimate to reflect the scope of the 2020 Work Plan, as it was prepared in April 2019 prior to the scope of the 2020 Work Plan being considered. This will be completed outside the 2020 ASR process, and in line with the review process for the Water Licence Amendment process under the guidance of the NWB.</p>

⁴ SNC (2019) Mary River Project, FINAL 2020 Annual Security Review, Crown-Indigenous Relations and Northern Affairs Canada. SNC-Lavalin Group, File No. 670026. 12 December 2019

⁵ Arcadis (2019) Reclaim Estimate for 2019 Annual Security Review with Phase 2 Program, Mary River Mine. Water Licence Application 2AM-MRY1325. Arcadis Canada Inc., 351455-000. 15 July 2019

⁶ CIRNAC (2019) Re: Crown-Indigenous Relations and Northern Affairs Canada Technical Review Comments on Baffinland Iron Mines Corporation Phase 2 Amendment Application for the Mary River Project, Water Licence 2AM-MRY1325 – Amendment No. 1

⁷ SNC (2018) 2018 Unit Rates Update and Revised Report. Memorandum to Sarah Forte, Wajid Dadouda, Ian Parsons. Ref. 658342-3000-4GER-0002_00. 20 December 2018

CIRNAC Recommendation	Baffinland Response
held by the Minister for a total of \$3,212,930 to cover the Crown portion of reclamation security for 2020.	
CIRNAC recommends that BIMC not engage in any work that is secured under the 2020 Work Plan, which may require a modification or an amendment to the licence without obtaining appropriate approvals from the NWB.	Baffinland confirms that work outlined in Table 3-1 of the 2020 Work Plan will not commence until the required regulatory approvals are received.
<p>To assist in refining the security estimates, CIRNAC recommends that BIMC provide:</p> <p>a) Clarifications requested in Table 5-1 of the SNC-Lavalin report in Annex A;</p> <p>b) Separation of work plan items which are approved and those which require approval within the EBS model;</p> <p>c) Updates to the Interim Closure and Reclamation Plan and the Phase 1 Waste Rock Management Plan, with consideration of design amendments as outlined in Table 5-1 of the SNC-Lavalin report in Annex A.</p>	<p>a) Responses to SNC's Table 5-1 are provided as Attachment 2.</p> <p>b) The Marginal Reclamation Security Estimate is designed to approximate the total value of reclamation security required for the scope of work outlined in the Work Plan. As presented, the 2020 Security Estimate provides the highest reclamation liability for the Mary River Project for the coming year. Separation of these items in the EBS will not increase the accuracy of the estimate, will create unnecessary granularity to an already complex estimation process, and will create redundancy in the calculation of indirect costs. For these reasons, the 2020 Security Estimate and associated EBS will not be revised to reflect the approvals required.</p> <p>c) The 2020 Security Estimate was prepared based on the available information at the time of publishing. Further, the Interim Closure and Reclamation Plan (ICRP) and the Waste Rock Management Plan (WRMP) updates will not have a material impact on the 2020 ASR. Contrary to the position taken by CIRNAC, direct costs for open pit development are not relevant to the 2020 ASR as the active mining at Deposit 1 consists of a hill top outcrop and not an active open pit, nor is open pit development to be initiated in 2020. Regarding the Waste Rock Facility (WRF), Baffinland increased the post closure monitoring costs associated with the operation of the WRF Water Treatment Plant for an assumed period of three (3) years during the 2019 ASR. Further updates may be required based on the WRMP in subsequent years or for the Phase 2 estimate.</p>

Qikiqtani Inuit Association Estimate

The submission provided by the QIA contained did not contain any specific requests for additional information or recommendations based on the estimate prepared by Arktis Solutions⁸ (Arktis). Where discrepancies between the estimates exist, or new positions taken by Arktis, Baffinland has attempted to reconcile these and/or provide a response.

Baffinland does not agree with the Arktis position that reasonable evidence does not exist to support a reduction in reclamation security associated with mobile and mechanical equipment. Baffinland acknowledges that while work has been completed to improve the use of SAP in tracking of equipment, further work is required to provide QIA with the certainty they require and to reconcile lists of equipment with the Baffinland and Arktis models. Despite this, Baffinland has provided lists of equipment mobilized and demobilized in 2019 from the sealift manifests, for which no uncertainty exists as these are fully audited and validated. Arktis has failed to utilize the manifest information provided in the 2020 Security Estimate in the preparation of their estimate and as a result has compounded the inaccuracy in their estimate and overestimated the liability associated with mobile and mechanical equipment. This is not only true for items that were backhauled from site following their use or decommissioning, but also items proposed in the 2019 Work Plan that did not arrive at the Mary River Project in 2019.

Baffinland disputes the findings of the 2019 Environmental Audit presented in Table 3-3 of the Arktis report, outlined as follows;

- **Ore Crusher Stockpile** – The total footprint of the Crushing Pad at the Mine Site from the as-built drawing in the 2018 QIA/NWB Annual Report is 106,574 m², inclusive of the previously expanded area of 12,500 m². Arktis indicates in the 2019 Environmental Audit that the total area in the estimate liability is 71,640 m³. However, the value used from the 2014 Work Plan (33,940 m²) is incorrect. Baffinland allocated 121,021 m² for the crushing pad in the 2014 Complete Project Financial Security Estimate. The EBS contains a total allocation of 194,901 m², which includes the yet-to-be-constructed expansion in the 2019 Work Plan of 12,000 m². This demonstrates that Baffinland is overbonded by 88,327 m², or approximately \$131,600. Baffinland is not seeking an reduction in the currently held liability at this time as the use of satellite imagery (Photosat) to assess total disturbed areas is still under review in consultation with QIA and any discrepancies can be reconciled once this practice is implemented. However, based on the current liability held there is no rationale for increasing the value as proposed by Arktis.
- **Ore Stockpile Settling Pond 1a** – Arktis has incorrectly cited the allocation for Pond 2a (4,400 m², yet to be constructed) from the 2019 Work Plan. The security allocation for Pond 1a is 5,000 m², as outlined in the 2018 Work Plan. Based on the Arktis evaluation of the as-built documentation provided for Pond 1a, the total actual disturbed area is 4,688 m². Therefore, Baffinland is overbonded by 312 m², or approximately \$465. As this discrepancy is minor, no adjustment in the liability is required.
- **Airstrip** – Arktis has included an allocation for the reclamation of the airstrip at the Mine site. However, as outlined in the ICRP (Rev. 5), the airstrip is to remain in place at closure. Based on

⁸ Arktis (2019) 2020 Mary River Reclamation Security Report, Version 1. Arktis Solutions, 13 December 2019

the closure strategy for the airstrip, no allocation for grade and re-contour of the facility will be included in the Baffinland estimate, and should be removed from the Arktis estimate.

- **Tote Road** – Arktis has included an allocation for the reclamation (grade and re-contour) of the Tote Road. While Baffinland has including allocations for the reclamation of Tote Road water crossings (culverts and bridges), as well as historical borrow sources, Baffinland has not included an allocation for the reclamation of the road. As outlined in the ICRP (Rev. 5), the Tote Road is to remain in place at closure. Additionally, the Tote Road is defined as a public road under Article 21, Part 4 of the Nunavut Land Claims Agreement, which would prevent Baffinland from removing the roadway as a transportation route. Based on the closure strategy for the Tote Road, no allocation for grade and re-contour will be included in the Baffinland estimate, and should be removed from the Arktis estimate.

Baffinland notes that many of the discrepancies between the Arktis estimate and the Baffinland estimate are attributed to the identified 'High Uncertainty Items'⁹ (Rev. 3, 2019). While it is the expectation from Baffinland that the current arbitration process will provide guidance on the High Uncertainty Items, it is acknowledged that these differences in position still exist for the 2020 ASR and have informed the respective estimates. Baffinland does not agree with the position presented by Arktis with respect to worker mobilization, disturbed areas, fuel, application of inflation, contingency and inventories.

The Arktis estimate increases the percentages applied for indirect costs for 'Supervision, Project Management and Contract Administration' (from 9.4% to 15%) and Engineering Fees (from 3.9% to 5%) without providing adequate justification for the revision. The Ontario Society of Professional Engineers (OSPE) fee guideline for 2015 indicates that for projects with a cost greater than \$10,000,000 the applicable fee is 14%, not 15%. Additionally, the OSPE guideline includes Engineering Design Services, which for the purpose of the estimate have been separated from the Supervision, Project Management and Contract Administration fee, thereby overestimating the indirect cost by double counting. Engineering fees of 3.9% were deemed appropriate by Arktis in their 2014 Comprehensive Security Estimate¹⁰ given the "average complexity" of the reclamation activities. Given that the complexity of the reclamation activities has not meaningfully increased with the scope of work proposed in the 2020 Work Plan, only the scale of the activities, Baffinland does not believe an increase to the percentage applied for engineering fees is valid.

⁹ Baffinland and QIA (2019) Mary River Financial Security Estimate High Uncertainty Items, Revision 3, 18 January 2019.

¹⁰ Arktis (2014) QIA 2014 Comprehensive Security Estimate for Baffinland Iron Mines Corporation's Mary Rover Project Activities Occurring on Inuit Owned Lands. Arktis Solutions, 12 December 2014.

Please advise if any further information requests are received or if there is any clarification needed on the responses Baffinland has provided herein. Baffinland looks forward to the ASR teleconference on January 10th and welcomes any further questions on the above topics and the remainder of the 2020 Security Estimate.

Regards,

A handwritten signature in black ink, appearing to read "Chris Murray", with a stylized flourish at the end.

Christopher Murray
Environmental & Regulatory Compliance Manager

cc. Megan Lord-Hoyle, Lou Kamermans (Baffinland)
Richard Dwyer, Karén Kharatyan, Stephanie Autut (NWB)
Chris Spencer, Jared Ottenhof (QIA)
Bridget Campbell, Godwin Okonkwo, Spencer Dewar (CIRNAC)

Attachments:

Attachment 1: Draft Revised 2020 Work Plan Items
Attachment 2: Baffinland Responses to SNC Report

Attachment 1

Draft Revised 2020 Work Plan Items

Table 3-1: Scope of Work for 2020

Item No.	Property Section	Land Use Area	Approximate Location	Description	Description of Effect on Feature(s)	Anticipated Completion Year	Required Permit or QIA Applications	Other Information
	<i>e.g. Milne Inlet/Tote Road/Mine Site</i>	<i>e.g. Impact Area /Exploration Area</i>	<i>Approximate UTM (if known) (Zone 17W)</i>	<i>Provide a detailed description of the activity.</i>	<i>A description of how the feature(s) (topographical and/or manmade) will be affected</i>	<i>N/A</i>	<i>List any associated permit applications if applicable.</i>	<i>e.g. Issued for construction documentation</i>
Scope of Work for 2020 – Pre-Project Certificate Approval								
1	Mine Site	Impact Area	N7913348 E561121	Installation of fuel line and associated piping between the mine site fuel storage areas and gensets. Total of 250m pipe.	Minor leveling and grading within Potential Development Area.	2020	Security	IFCs
2	Mine Site	Impact Area	N7913321 E560631	Installation of a mine dry facility at the Sailivik Camp.	No effect, will be placed on developed laydown within Potential Development Area	2020	Security	Layout Drawings
3	Mine Site / Milne Port	Impact Area	(A) Mine Site - N7914780 E558420 (B) Milne Port - N7975973 E503774	Installation of two (2) new waste incineration units; one (1) at the Mine Site, one (1) at Milne Port	No effect, will be placed on developed laydown within Potential Development Area	2020	Security Water Licence Modification	IFCs
4	Mine Site	Impact Area	N7916800 E563270	Construction of a new sedimentation pond at the Waste Rock Facility. Pond will be lined and have an approximate footprint of 50,000 m ² .	Leveling and grading within Potential Development Area	2020	Security Water Licence Modification	IFCs
5	Mine Site	Impact Area	N7916744 E563228	Expansion of the Waste Rock Facility Water Treatment Plant to include an additional geotube settling containment area. Total footprint of new lined area is 3,000 m ³ .	Leveling and grading within Potential Development Area	2020	Security Water Licence Modification	IFCs
6	Mine Site	Impact Area	N7915730 E563348	Installation of a hard line for transfer of water from Deposit 1 to the Waste Rock Facility sedimentation pond. Hard line will replace current use of layflat hose. Total length of line is 3,500 m.	Positive environmental effect, focus on improving water management and reduction of spill potential. Minor leveling and grading with the Potential Development Area	2020	Security Water Licence Modification	IFCs
7	Mine Site	Impact Area	N7915529 E564028	Construction of a sedimentation pond at the Mine Haul Road to manage surface water runoff. Pond will be lined and have a footprint of 10,000 m ² .	Leveling and grading within Potential Development Area	2020	Security Water Licence Modification	IFCs
8	Mine Site	Impact Area	N7914428 E563192	Implementation of a water management plan for Deposit 1, including berms and ditching to manage surface water.	Leveling and grading within the ultimate limit of Deposit 1	2020	None	IFCs

Item No.	Property Section	Land Use Area	Approximate Location	Description	Description of Effect on Feature(s)	Anticipated Completion Year	Required Permit or QIA Applications	Other Information
	<i>e.g. Milne Inlet/Tote Road/Mine Site</i>	<i>e.g. Impact Area /Exploration Area</i>	<i>Approximate UTM (if known) (Zone 17W)</i>	<i>Provide a detailed description of the activity.</i>	<i>A description of how the feature(s) (topographical and/or manmade) will be affected</i>	<i>N/A</i>	<i>List any associated permit applications if applicable.</i>	<i>e.g. Issued for construction documentation</i>
9	Mine Site	Impact Area	N7913203 E561491	Construction of concrete pad apron exterior to the HD Shop. Total footprint of 1,020 m ² .	No effect, will be placed on developed laydown within Potential Development Area	2020	Security	Layout Drawings
10	Mine Site	Impact Area	N7913312 E561706	Expansion of the area east of the Mine Site workshops and mine haul road for improved traffic management. Additional footprint of 18,000 m ² .	Leveling and grading within Potential Development Area	2020	Security	Layout Drawings
11	Mine Site	Impact Area	(A) KM 104 - N7916450 E562500 (B) Mine Site - N7911913 E561737 (C) Milne Port - N7967739 E511181	Expansion of the explosive magazines storage area at Km 104 (8,000 m ²) and heated storage facilities (400 m ² each) for emulsion truck parking at Mine Site (1,600 m ² disturbed) and Milne Port (27,700 m ² disturbed).	Leveling and grading within Potential Development Area	2020	Security	Layout Drawings
12	Mine Site	Impact Area	(A) HD Shop - N7913209 E561467 (B) MR Shop - N7913295 E5612525 (C) Wash Bay - N7913213 E561645 (D) 110 Laydown - N7915177 E563454	Construction of a waste containment cells exterior to workshop facilities, for temporary storage of materials prior to longer term storage in the Hazardous Waste Berms and eventual backhaul. HD Shop - 72 m ² MR Shop - 120 m ² Wash Bay - 120 m ² 110 Laydown - 144 m ²	Lined area on developed laydown within the Potential Development Area	2020	Security Water Licence Modification OEN	IFCs
13	Mine Site	Impact Area	N7915503 E563241	Additional maintenance facilities at the KM110 laydown to support maintenance of Deposit 1 equipment. Facilities include two heated structures for mobile equipment storage (60 m ² and 120 m ²), a concrete pad for tire maintenance (60 m ²), and welding shop (540 m ²).	No effect, will be placed on developed laydown within Potential Development Area	2020	Security	Layout Drawings
14	Mine Site	Impact Area	N7913336 E561455	Installation of new trailers/offices and environmental lab in camp area, and new trailer/Dry in crushing area.	No effect, will be placed on developed laydown within Potential Development Area	2020	Security	Layout Drawings
15	Mine Site	Impact Area	N7914047 E559584	Expansion of the warehouse laydown area for additional storage of seacans and equipment. Total area of 3,200 m ² .	Leveling and grading within Potential Development Area	2020	Security	Layout Drawings
16	Mine Site	Impact Area	N7914137 E559330	Installation of permanent lighting for port and logistics. Total of 600 m of electrical cabling.	No effect, will be placed on developed laydown within Potential Development Area	2020	Security	Layout Drawing
17	Milne Port	Port	N7975343 E503420	New thaw and wash bay facility for mobile vehicle maintenance. Footprint of 1,250 m ² .	No effect, will be placed on developed laydown within Potential Development Area	2020	Security	Layout Drawings
18	Milne Port	Port	N7976186 E503506	Warehouse/parts staging area facility upgrades, including a new seacan tent building with a footprint of 540 m ² .	No effect, will be placed on developed laydown within Potential Development Area	2020	Security	Layout Drawings

Item No.	Property Section	Land Use Area	Approximate Location	Description	Description of Effect on Feature(s)	Anticipated Completion Year	Required Permit or QIA Applications	Other Information
	<i>e.g. Milne Inlet/Tote Road/Mine Site</i>	<i>e.g. Impact Area /Exploration Area</i>	<i>Approximate UTM (if known) (Zone 17W)</i>	<i>Provide a detailed description of the activity.</i>	<i>A description of how the feature(s) (topographical and/or manmade) will be affected</i>	<i>N/A</i>	<i>List any associated permit applications if applicable.</i>	<i>e.g. Issued for construction documentation</i>
19	Milne Port	Port	N7975294 E503444	Construction of a waste containment cell exterior to workshop facilities, for temporary storage of materials prior to longer term storage in the Hazardous Waste Berms and eventual backhaul. Port Shop - 72 m ² .	Lined area on developed laydown within the Potential Development Area	2020	Security Water Licence Modification OEN	Layout Drawings
20	Tote Road	Impact Area	Various	Continued work to repair and replace culverts along the Tote Road, including those with identified fish passage issues. All culverts will be repaired or replaced to the 2013 Hatch design.	Positive environmental effect, focus on improving water management and fish passage	2020	None - Security in Place	N/A
21	Tote Road	Impact Area	(A) KM 26 - N7959689 E518576 (B) KM 80 - N7922308 E542130	Addition of washroom facilities/refuge stations at KM26 and KM80 IT Towers.	Minor leveling and grading within Potential Development Area.	2020	Security	Layout Drawings
22	Tote Road	Impact Area	(A) LD 1 - N7974598 E504031.7 (34,300 m²) (B) LD 5 - N7971792 E505809.5 (11,700 m²) (C) LD 6 - N7971592 E506308.6 (14,500 m²) (D) LD 7 - N7967353 E510801.9 (10,500 m²) (E) LD 8 - N7965208 E514586.3 (82,000 m²) (F) LD 9 - N7961896 E517314.1 (16,300 m²) (G) LD 10 - N7953050 E521698.1 (6,400 m²) (H) LD 11 - N7945107 E522987 (3,900 m²) (I) LD 13 - N7932775 E527204.4 (10,100 m²) (J) LD 14 - N7932595 E527169.2 (9,600 m²) (K) LD 15 - N7928987 E528177.1 (28,800 m²) (L) LD 17 - N7929018 E528353.3 (37,200 m²) (M) LD 19 - N7928223 E528375 (25,000 m²) (N) LD 20 - N7916986 E528571 (35,300 m²) (O) LD 21 - N7921431 E540500.9 (19,800 m²) (P) LD 22 - N7921907 E542504.3 (24,700 m²) (Q) LD 23 - N7921484 E542998.7 (15,500 m²) (R) LD 24 - N7921431 E543185.7 (3,400 m²) (S) LD 25 - N7919695 E547057.5 (17,400 m²) (T) LD 26 - N7914864 E554770.8 (25,000 m²) (U) LD 27 - N7914686 E555311.4 (28,200 m²) (V) LD 28 - N7915289 E556192.5 (17,400 m²) (W) LD 29 - N7914997 E558173.9 (14,600 m²) (X) LD 30 - N7913726 E560009.9 (23,300 m²) (Y) LD 31 - N7913354 E560886.5 (13,900 m²) (Z) LD 32 - N7913258 E560829.4 (17,200 m²) (AA) R3 Expansion - N7972423 E505189 (73,275 m²)	Development of twenty-six (26) laydowns adjacent to the Tote Road for material stockpiling and storage. Laydowns will be constructed of 500 mm thick quarried rock with granular surfacing, and free draining.	Leveling and grading within Potential Development Area	2020	Security OEN	Layout Drawings

Item No.	Property Section	Land Use Area	Approximate Location	Description	Description of Effect on Feature(s)	Anticipated Completion Year	Required Permit or QIA Applications	Other Information
	<i>e.g. Milne Inlet/Tote Road/Mine Site</i>	<i>e.g. Impact Area /Exploration Area</i>	<i>Approximate UTM (if known) (Zone 17W)</i>	<i>Provide a detailed description of the activity.</i>	<i>A description of how the feature(s) (topographical and/or manmade) will be affected</i>	<i>N/A</i>	<i>List any associated permit applications if applicable.</i>	<i>e.g. Issued for construction documentation</i>
23	Tote Road	Impact Area	(A) PQ2 – N7926119 E527843 (187,738 m2) (B) Q27 – N7923196 E527160 (110,000 m2) (C) Q42 – N7912660 E561672 (70,000 m2) (D) PQ5A – N7938861 E525359 (230,000 m2) (E) PQ9A – N7920451 E527512 (90,000 m2) (F) PQ9B – N7920446 E527652 (30,000 m2) (G) PQ10B – N7917633 E531977 (100,000 m2) (H) PQ13 – N7923675 E542584 (460,000 m2) (I) PQ14B – N7917407 E550988 (110,000 m2) (J) PQ15A – N7915621 E555856 (90,000 m2) (K) PQ15B – N7915580 E555270 (70,000 m2) (L) PQ4B – N7941891 E523628 (130,000 m2) (M) PQ5B – N7937814 E525986 (580,000 m2) (N) PQ6B – N7928993 E528901 (230,000 m2) (O) PQ10A – N7917528 E531565 (130,000 m2) (P) PQ12B – N7921782 E539876 (200,000 m2) (Q) PQ14A – N7917828 E550825 (50,000 m2) (R) PQ2B – N7961972 E517663 (240,000 m2) (S) P2 – N7927792 E528496 (80,000 m2)	Development and expansion of quarries, consisting of; nineteen (19) new quarries with 8 m wide access roads.	Leveling and grading within Potential Development Area	2020	Security Quarry Management Plans QEN	IFCs
24	Tote Road	Impact Area	N7928978 E528394	Contractor offices, garages and workshops installed on LD-15.	No effect, will be placed on developed laydown within Potential Development Area	2020	Security	Layout Drawings

Item No.	Property Section	Land Use Area	Approximate Location	Description	Description of Effect on Feature(s)	Anticipated Completion Year	Required Permit or QIA Applications	Other Information
	<i>e.g. Milne Inlet/Tote Road/Mine Site</i>	<i>e.g. Impact Area /Exploration Area</i>	<i>Approximate UTM (if known) (Zone 17W)</i>	<i>Provide a detailed description of the activity.</i>	<i>A description of how the feature(s) (topographical and/or manmade) will be affected</i>	<i>N/A</i>	<i>List any associated permit applications if applicable.</i>	<i>e.g. Issued for construction documentation</i>
Scope of Work for 2020 – Post Project Certificate Approval								
25	Northern Transportation Corridor	Impact Area	(A) Access Road # 8 N7969297 E508433(1,993 m2) (B) Access Road # 10 N7967092 E511899(1,686 m2) (C) Access Road # 11 N7966368 E513452(1,871 m2) (D) Access Road # 13 N7964026 E515251(2,969 m2) (E) Access Road # 14 N7962230 E517078(1,784 m2) (F) Access Road # 15 N7961140 E518043(16,883 m2) (G) Access Road # 18 N7955315 E520875(2,027 m2) (H) Access Road # 19 N7954685 E521307(1,481 m2) (I) Access Road # 20 N7953657 E521645(1,750 m2) (J) Access Road # 22 N7952168 E521800(1,400 m2) (K) Access Road # 23 N7951626 E521937(2,215 m2) (L) Access Road # 24 N7949482 E521764(2,241 m2) (M) Access Road # 26 N7947121 E522503(3,121 m2) (N) Access Road # 27 N7945575 E522751(2,090 m2) (O) Access Road # 28 N7944802 E523193(2,052 m2) (P) Access Road # 29 N7943298 E523343(2,548 m2) (Q) Access Road # 32 N7940436 E524160(3,054 m2) (R) Access Road # 33 N7939046 E524963(1,909 m2) (S) Access Road # 34 N7938433 E525354(12,378 m2) (T) Access Road # 36 N7935442 E526828(21,106 m2) (U) Access Road # 37 N7934959 E526872(5,241 m2) (V) Access Road # 38 N7933761 E527063(2,506 m2) (Q) Access Road # 40 N7932185 E527300(9,973 m2) (X) Access Road # 41 N7931722 E527210(3,221 m2) (Y) Access Road # 43 N7930177 E527702(1,370 m2) (Z) Access Road # 46 N7919035 E536803(100,444 m2) (AA) Access Road # 48 N7920772 E539715(30,076 m2) (AB) Access Road # 49 N7921682 E541000(3,392 m2) (AC) Access Road # 58 N7915200 E553389(24,462 m2) (AD) Access Road # 62 N7915177 E557651(893 m2) (AE) Access Road # 64 N7914834 E558433(13,861 m2) (AF) Access Road # 66 N7914526 E558957(11,983 m2) (AG) Access Road # 67 N7914340 E559250(2,477 m2) (AH) Access Road # 68 N7914064 E559644(13,321 m2) (AI) Access Road # 69 N7913896 E559885(1,979 m2) (AJ) Access Road # 70 N7913726 E560234(1,970 m2) (AK) Access Road # 73 N7913338 E560847(2,551 m2)	These access roads have an interface with a waterbody. Construction of access roads to adjacent rail alignment. This activity includes the grading, leveling and compaction of fill material for the construction of access roads that will connect the rail alignment with the existing Tote Road. Local rock quarries shall be utilized for all base and fill materials.	Minor to moderate leveling and grading within Potential Development Area.	2020	Security Phase 2 Project Certificate	Layout Drawings
26	Mine Site	Impact Area	N7913446 E561080	Construction of one (1) arctic diesel fuel tank (Tk6) with 15ML capacity, and associated fuel piping. The fuel tank will be constructed on a pad within the existing Mine Site fuel storage facility.	No effect, will be placed on developed lined containment facility within Potential Development Area	2020	Security Phase 2 Project Certificate	IFCs

Item No.	Property Section	Land Use Area	Approximate Location	Description	Description of Effect on Feature(s)	Anticipated Completion Year	Required Permit or QIA Applications	Other Information
	<i>e.g. Milne Inlet/Tote Road/Mine Site</i>	<i>e.g. Impact Area /Exploration Area</i>	<i>Approximate UTM (if known) (Zone 17W)</i>	<i>Provide a detailed description of the activity.</i>	<i>A description of how the feature(s) (topographical and/or manmade) will be affected</i>	<i>N/A</i>	<i>List any associated permit applications if applicable.</i>	<i>e.g. Issued for construction documentation</i>
27	Milne Port	Impact Area	N7975731 E504637	Construction of service access road circling around the rail alignment and terminating at KM 0.	Leveling and grading within the revised Potential Development Area	2020	Security Phase 2 Project Certificate OEN	IFCs
28	Milne Port	Impact Area	(A) N7974894 E503434 (B) N7974963 E503800	Foundation excavation for future material handling infrastructure. Car dumper and reclaim tunnel basement with precast concrete footings (2,235 m2) and a new disturbed area (15,300 m2), and Conical Stockpile tunnel with precast concrete footings (1,040 m2) on existing disturbed area.	Excavation, leveling and grading within the Potential Development Area.	2020	Security Phase 2 Project Certificate	IFCs
29	Tote Road	Impact Area	(A) Km 1.992 – N7974232 E504070 (B) Km 9+460 – N7968767 E508869 (C) Km 12+420 – N7967205 E511246 (D) Km 23+286 – N7959869 E518477 (E) Km 55+343 – N7930406 E527623 (F) Km 86+941 – N7921378 E543209 (G) Km 91+750 – N7919838 E546889 (H) Km 95+957 – N7917490 E550623	Realignment of the Tote Road for a safe level crossing point over future rail superstructure.	Leveling and grading within the revised Potential Development Area	2020	Security Phase 2 Project Certificate TRAN OEN	IFCs
30	Tote Road	Impact Area	(A) Km 13 – N7967458 E512157 (B) Km 52.4 – N7963600 E527390 (C) Km 59.3 – N7927785 E528383 (D) Km 75.7 – N7921938 E540698	Installation of pre-fabricated explosives magazine to store packaged explosives, detonators and charges.	Leveling and grading within the revised Potential Development Area	2020	Security Phase 2 Project Certificate OEN NRCan	IFCs
Work Carried over from 2019 & Prior – Security in Place								
2019-1	Rail/ Tote Road/ Milne Port	Impact Area	(A) Q1 - N7974810 E503970 (B) Q5 - N7972300 E506000 (650,000 m2) (C) PQ2A - N7955289 E522130 (345,500 m2) (D) PQ4A - N7942972 E523552 (105,000 m2) (E) PQ6A - N7929733 E528240 (194,000 m2) (F) PQ12A - N7920935 E539158 (232,300 m2)	Development and expansion of quarries, consisting of; four (4) new quarries along the Tote Road with 8m wide access roads, expansion of previously proposed but not constructed quarry Q5, and expansion of the working limits of existing quarry Q1.	Leveling and grading within Potential Development Area and Tote Road	2020	Quarry Management Plans	Surveys
2019-2	Rail/Tote Road	Impact Area	(A) Laydown 4 - N7960605 E518164 (66,300 m2) (B) Laydown 7 - N7940427 E524119 (28,900 m2) (C) Laydown 9 - N7929681 E527833 (92,500 m2) (D) Laydown 10 - N7921358 E540249 (34,500 m2) (E) Laydown 13 - N7915170 E557599 (7,000 m2)	Development of six (6) laydowns adjacent to the existing Tote Road for material stockpiling and storage. The laydowns will be constructed by filling directly over undisturbed ground and 31m away from the high water mark of local water bodies. The laydowns will be constructed of 500 mm thickness quarried rock with granular surfacing, free draining to appropriate ditches and water courses. Laydown 2 completed in 2019.	Leveling and grading within Potential Development Area	2020	OEN (Approved)	Layout Drawing
2019-3	Tote Road	Impact Area	(A) KM8 N7971327 E506536 (B) KM97 N7914750 E554750	Grade adjustments at KM8 and KM97 to improve safety and drainage. No new culvert installations required.	Leveling and grading within Potential Development Area.	2020	TRAN	IFCs

Item No.	Property Section	Land Use Area	Approximate Location	Description	Description of Effect on Feature(s)	Anticipated Completion Year	Required Permit or QIA Applications	Other Information
	<i>e.g. Milne Inlet/Tote Road/Mine Site</i>	<i>e.g. Impact Area /Exploration Area</i>	<i>Approximate UTM (if known) (Zone 17W)</i>	<i>Provide a detailed description of the activity.</i>	<i>A description of how the feature(s) (topographical and/or manmade) will be affected</i>	<i>N/A</i>	<i>List any associated permit applications if applicable.</i>	<i>e.g. Issued for construction documentation</i>
2019-6	Milne Port	Impact Area	N7975763 E502984 (155,000 m2)	Expansion of the Milne Port Ore Stockpile and water management facilities to optimize stockpiling and shiploading operations, resulting in additional 140,000 m2 of stockpile area and 15,000 m2 lined sedimentation pond.	Leveling and grading within Potential Development Area	2020	Water Licence Modification No. 12 (Approved)	IFCs
2019-7	Milne Port	Impact Area	N7974938 E503109 (6,000 m2)	Construction of berm and linear steel support structure on laydown LP3 for receipt and storage of stacker/reclaimer equipment. Berm dimensions are 200m x 30m x 2m, constructed on existing disturbed area.	No effect, will occur on developed laydown within Potential Development Area	2019	None - on existing disturbed area	Layout Drawing(s)
2019-8	Milne Port	Impact Area	N7976033 E503590 (4,180 m2)	Construction of new polishing waste stabilization pond (PWSP) at 380 Person camp to manage off-spec effluent from the 380p camp waste water treatment plant	No effect, will occur on developed laydown within Potential Development Area	2020	OEN Water Licence Modification	IFCs
2019-9	Milne Port	Impact Area	N7975481 E503779 (2,700 m2)	New contaminated water/snow containment pond adjacent to existing pond at Milne Port	Leveling and grading within Potential Development Area	2020	OEN Water Licence Modification	IFCs
2019-11	Mine Site / Milne Port	Impact Area	(A) Mine Site - N7914539 E558228 (360 m2) (B) Milne Port - N7976251 E503915 (360 m2)	Construction of new hazardous waste berm at the Mine site and at Milne Port. Decommissioning of select existing berms to consolidate waste management.	Environmental optimization. Leveling and grading within Potential Development Area	2020	OEN Water Licence Modification	IFCs
2019-12	Mine Site	Impact Area	N7914015 E564007 (91,000 m2)	Laydown area for parking and equipment storage at Km 107.5.	Leveling and grading within Potential Development Area	2020	None	Layout drawing(s)
2019-13	Mine Site	Impact Area	N7915590 E563181 (180,000 m2)	New KM110.5 Laydown for additional equipment storage and maintenance shop installation	Leveling and grading within Potential Development Area	2020	None	Layout drawing(s)
2019-14	Mine Site	Impact Area	N7915590 E563181 (1,500 m2)	Heated maintenance shop for pit equipment at Km 110.5 Laydown. Tent structure with lined floor. Footprint is approximately 1,500 m ² .	No effect, will occur on developed laydown within Potential Development Area	2020	None	Layout drawing(s)
2019-15	Mine Site	Impact Area	N7914500 E558150 (area m2)	Decommissioning and repurposing of Weatherhaven structures for storage and workspace.	No effect, will occur on developed laydown within Potential Development Area	2020	None	None

Item No.	Property Section	Land Use Area	Approximate Location	Description	Description of Effect on Feature(s)	Anticipated Completion Year	Required Permit or QIA Applications	Other Information
	<i>e.g. Milne Inlet/Tote Road/Mine Site</i>	<i>e.g. Impact Area /Exploration Area</i>	<i>Approximate UTM (if known) (Zone 17W)</i>	<i>Provide a detailed description of the activity.</i>	<i>A description of how the feature(s) (topographical and/or manmade) will be affected</i>	<i>N/A</i>	<i>List any associated permit applications if applicable.</i>	<i>e.g. Issued for construction documentation</i>
2019-16	Mine Site	Impact Area	N7913450 E560450 (12,000 m2)	Expansion of the 800 person camp pad to the north by approximately 12,000 m ² to accommodate additional support offices and buildings.	Leveling and grading within Potential Development Area	2020	None	Layout drawing(s)
2019-17	Mine Site	Impact Area	N7913450 E560450 (925 m2)	Addition of offices/trailers/buildings at the 800p Camp. Total footprint is 925 m ² , including approximately 500 m ² for a new fire hall and emergency response building.	No effect, will occur on developed laydown within Potential Development Area	2019	None	Layout drawing(s)
2019-18	Mine Site	Impact Area	N7912328 E561111 (9,000 m2)	Construction of a landfarm at the Mine Site landfill facility, with an estimated footprint of 9,000 m2. Disturbed area included in 2018 Addendum, new lined area requires security allocation.	Leveling and grading within Potential Development Area. Area already allocated as disturbed.	2020	Water Licence Modification No. 10 (Approved) Security in place Notification to NWB	IFCs
2019-20	Mine Site	Impact Area	N7913446 E561080	Construction of one (1) arctic diesel fuel tank (Tk6) with 15ML capacity, and associated fuel piping. The fuel tank will be constructed on a pad within the existing Mine Site fuel storage facility.	No effect, will be placed on developed lined containment facility within Potential Development Area	2020	Phase 2 Project Certificate	IFCs
2019-21	Mine Site	Impact Area	N7912830 E561787 (12,000 m2)	Upgrades to the mine site crusher facility, including expansion of the crusher pad (12,000 m ²), new water diversion structures, and increase to sedimentation pond (MS-06) capacity (2,000 m ²). Installation of one (1) culvert in northern perimeter ditching to allow for vehicle access to maintenance shop.	Leveling and grading within Potential Development Area	2020	Water Licence Modification	IFCs
2019-23	Mine Site	Impact Area	N7913284 E563431 (133,400 m2)	Construction of a Run of Mine (ROM) Stockpile at KM 106 (previously KM107) (76,600 m2) and sedimentation pond (10,600 m ² disturbed, 7,500 m ² lined).	Leveling and grading within Potential Development Area	2020	Notification to NWB (Completed)	IFCs
2019-25	Milne Port	Impact Area	N7976389 E503422 (4,400 m2)	Installation of East Sedimentation Pond Expansion (2a) approved with Modification No. 9, but for which security has not been allocated.	Leveling and grading within Potential Development Area	2020	Water Licence Modification No. 9 (Approved) Submission of IFC Drawings (Submitted)	IFCs
2018-A1	Mine Site	Impact Area	N7914560 E563904	Construction of the Mine Haul Road Cross Cut, and widening of the existing Mine Haul Road for safety purposes and to permit larger truck traffic	Minor leveling and grading within Potential Development Area	2020	Water Licence Modification No. 7 (Approved) Submission of IFC Drawings (Submitted)	IFCs
2018-27	Milne Port	Impact Area	N7976483 E504119	Relocation of effluent discharge point to barge offload area	Positive effect. Reduced environmental spill risk.	2020	Water Licence Modification No. 7 (Approved)	IFCs

Item No.	Property Section	Land Use Area	Approximate Location	Description	Description of Effect on Feature(s)	Anticipated Completion Year	Required Permit or QIA Applications	Other Information
	<i>e.g. Milne Inlet/Tote Road/Mine Site</i>	<i>e.g. Impact Area /Exploration Area</i>	<i>Approximate UTM (if known) (Zone 17W)</i>	<i>Provide a detailed description of the activity.</i>	<i>A description of how the feature(s) (topographical and/or manmade) will be affected</i>	<i>N/A</i>	<i>List any associated permit applications if applicable.</i>	<i>e.g. Issued for construction documentation</i>
2018-28	Milne Port	Impact Area	N7976491 E504122	Marine manifold building relocation - moving from current location north of fuel tank farm to upgraded freight dock location	Positive effect. Reduced environmental spill risk.	2020	Water Licence Modification No. 7 (Approved)	Layout drawing
Progressive Reclamation								
-	Milne Port	-	N7975568 E503745	Management of hydrocarbon impacted soils within the existing landfarm facility.	N/A	Ongoing	N/A	N/A
-	Milne Port	-	N/A	Demobilization of equipment and supplies not required for near term activities as well as current inventory of hazardous waste and other materials by means of sealift from Milne Port	N/A	2018	N/A	N/A
-	Milne Port and Mine Site	-	N/A	Discharge and treatment of residual treated sewage effluent stored in PWSP at Mary River Exploration Camp and Milne Port Site.	N/A	Ongoing	N/A	N/A
-	Tote Road	-	N/A	Continue the development and implementation of a long term multi-year plan to address localized areas of permafrost degradation associated with the current borrow areas including KM97, and the area	N/A	Ongoing	N/A	N/A
-	Tote Road	-	N/A	Reclamation of sections of the exploration phase Tote Road no longer in use by means of scarifying and culvert removals.	N/A	Ongoing	N/A	N/A
-	Mine Site	-	N7912845 E560922	Continued development of the Mine Site landfill and deposition of non-hazardous waste in accordance with the Landfill Maintenance and Operations Manual	N/A	Ongoing	N/A	N/A
-	Site Wide	-	N/A	Ongoing removal from site, or safe disposal on-site of infrastructure, equipment and supplies no longer required for ongoing construction and operations.	N/A	Ongoing	N/A	N/A
-	Site Wide	-	N/A	Unless otherwise identified within the approved interim Closure and Reclamation Plan, where roads are no longer in use - removal of culvert and open/restore the natural drainage channel. Measures will be taken to minimize erosion and sedimentation	N/A	Ongoing	N/A	N/A
-	Site Wide	-	N/A	Areas that have been contaminated by hydrocarbons from normal fuel transfer, handling and storage activities will be reclaimed to meet objectives as outlined in the Government of Nunavut's Environmental Guideline for Site Remediation 2010. Use of reclamation soils for purpose of back fill or general site grading may be carried out with approval of applicable inspectors and agencies.	N/A	Ongoing	N/A	N/A

Table 8-1: Mobile and Mechanical Equipment to be received during 2020

Property Section	Material Item	Owner	Quantity	Revenue Tonne
<i>e.g. Milne Port or Mine Site</i>	<i>Description of the material*</i>		<i>Quantity of the material to be shipped to and stored on the Property (including unit of measurement)</i>	<i>Estimated amount of revenue tonnes (mt) assigned to the shipping of material</i>
Mine Site	Feed Convyor	Baffinland	1	230
Mine/Port	GE 16V250 Genset 3500 kw	Baffinland	5	650
Milne Port	Generator 1000 kW	Baffinland	1	30
Milne Port	Conveyors	Baffinland	3	120
Milne Port	Jaw crusher unit	Baffinland	1	90
Milne Port	Screener + Cone crusher unit	Baffinland	1	170
Mine Site	349 Excavator	Baffinland	1	80
Mine Site	908 Loader	Baffinland	2	140
Mine Site	950 Loader	Baffinland	2	140
Mine Site	345 Excavator	Baffinland	1	80
Mine Site	988 loader with forks	Baffinland	1	70
Mine Site	Western Star Tractor	Baffinland	2	23
Mine Site	6060 Shovel	Baffinland	1	200
Mine Site	793 Haul Truck	Baffinland	3	375
Mine Site	992 Loader	Baffinland	1	70
Mine Site	16M Grader	Baffinland	1	70
Mine Site	D10 Dozer	Baffinland	1	70
Mine Site	374 Excavator	Baffinland	2	80
Milne Port	374F Excavator	Baffinland	4	80
Milne Port	745C truck	Baffinland	5	625
Mine Site	light plant	Baffinland	19	15.2
Milne Port	Light Vehicles (F250 or equiv.)	Baffinland	1	1
Milne Port	Kubota Side by Side	Baffinland	1	8
Milne Port	259B Skid Steer	Baffinland	1	15
Mine Site	Light Vehicles (F350 or equiv.)	Baffinland	28	28
Mine Site	Larue Snow Blower	Baffinland	1	0.5
Mine Site	Skid steer snow blower	Baffinland	2	30
Mine Site	Skid Steer	Baffinland	3	45
Mine Site	Powertraxx Tracked Vehicle	Baffinland	1	0.5
Mine Site	257 Skid steer	Baffinland	2	30
Mine Site	Blaze Cube Frost Fighters	Baffinland	2	1.6
Milne Port	Light Vehicles (F350 or equiv.)	Baffinland	8	8

Property Section	Material Item	Owner	Quantity	Revenue Tonne
<i>e.g. Milne Port or Mine Site</i>	<i>Description of the material*</i>		<i>Quantity of the material to be shipped to and stored on the Property (including unit of measurement)</i>	<i>Estimated amount of revenue tonnes (mt) assigned to the shipping of material</i>
Mine Site	600kw Generators	Baffinland	2	2
Mine Site	60kw Generator	Baffinland	3	1
Mine /Port	Atlas 1000 mVA Transformers	Baffinland	4	400
Mine Site	24p Passenger Bus	Baffinland	1	20
Mine Site	Fire Truck (4x4)	Baffinland	1	18
Mine Site	740B Water Truck	Baffinland	1	80
Mine Site	F550 Snow Plow	Baffinland	2	2
Mine Site	14M Grader	Baffinland	1	60
Mine Site	Fuel Tanker	Baffinland	1	25
Mine Site	Service/Fuel Truck (F550)	Baffinland	8	8
Mine Site	Jet A Truck	Baffinland	1	15
Mine Site	Cube truck	Baffinland	2	4
Mine Site	740 water truck	Baffinland	1	80
Mine Site	Vac Truck	Baffinland	2	23
Mine Site	48p School Bus	Baffinland	2	20
Mine Site	Steam truck	Baffinland	1	17
Mine Site	Telehandler	Baffinland	1	20
Mine Site	D65 Dozer	Baffinland	1	70
Mine Site	Track Mounted Drill Rig	Baffinland	2	18
Mine Site	4x4 hotseating bus	Baffinland	2	20
Mine Site	Flat bed boom truck	Baffinland	1	9
Mine Site	CCM200E Concrete Mixer	Baffinland	1	14
Mine Site	Pressure Washing Truck	Baffinland	1	8
Milne Port	D6T Dozer	Baffinland	1	70
Milne Port	Portable C130 Jaw Crusher	Baffinland	3	550
Milne Port	844 Loader	A&B	2	140
Milne Port	CAT 950 loader	A&B	1	70
Milne Port	CAT 988 loader	A&B	1	70
Milne Port	Doosan Compressor – #171-195	A&B	1	3
Milne Port	Generator	A&B	4	32
Milne Port	55KW Generator	A&B	2	8
Milne Port	Air compressors	A&B	11	22
Milne Port	Bear Proof Garbage Bin	A&B	2	0.5
Milne Port	Light plants	A&B	9	7.2

Property Section	Material Item	Owner	Quantity	Revenue Tonne
<i>e.g. Milne Port or Mine Site</i>	<i>Description of the material*</i>		<i>Quantity of the material to be shipped to and stored on the Property (including unit of measurement)</i>	<i>Estimated amount of revenue tonnes (mt) assigned to the shipping of material</i>
Milne Port	Light Vehicles (GMC)	A&B	8	8
Milne Port	Ballast regulators 940	A&B	1	8
Milne Port	Diesel rail heater Unit #10172	A&B	1	5
Milne Port	F550 Service Truck – Unit #51297	A&B	1	2
Milne Port	Zoom Boom + Man Basket	A&B	1	10
Milne Port	Passenger Vans (15p)	A&B	6	6
Milne Port	Clipping Machine	A&B	2	14
Milne Port	Crew Van 4x4 15-passenger	A&B	3	3
Milne Port	Diesel Rail Heater Drapeau 2	A&B	1	6
Milne Port	Diesel rail heaters	A&B	2	12
Milne Port	Light Vehicles (F350 or equiv.)	A&B	10	10
Milne Port	Geismar Power Jack Model RV100	A&B	1	4
Milne Port	Herman Nelson 6700	A&B	3	3
Milne Port	Herman Nelson extreme cold BT400NEX-D4A	A&B	4	4
Milne Port	Herman Nelson Flagro 1000 trailer mount	A&B	1	1
Milne Port	MPR rail threaders	A&B	6	6
Milne Port	Pickup trucks	A&B	29	29
Milne Port	Skidsteer	A&B	1	15
Milne Port	Tie Spacing Optimizer	A&B	4	4
Milne Port	Towable generators	A&B	10	7
Milne Port	10T Hi Rail Boom Truck	A&B	1	4
Milne Port	Speedswing with magnet	A&B	1	12
Milne Port	544 Loader	A&B	11	770
Milne Port	744 Loaders	A&B	2	140
Milne Port	JOHN DEER 245G Excavator	A&B	1	80
Milne Port	JOHN DEERE LOADER 744K UNIT#30356	A&B	1	70
Milne Port	Mark IV tampers	A&B	1	8
Milne Port	Nordco Clipping Machine	A&B	2	26
Milne Port	Pettibone Speedswings, Wide Axle	A&B	1	24
Milne Port	Scissor Neck Rail trailers	A&B	1	14
Milne Port	Tower Light	A&B	2	1.6
Milne Port	Trombone trailers	A&B	5	20
Milne Port	Western Star Fuel Truck	A&B	1	18

Property Section	Material Item	Owner	Quantity	Revenue Tonne
e.g. Milne Port or Mine Site	Description of the material*		Quantity of the material to be shipped to and stored on the Property (including unit of measurement)	Estimated amount of revenue tonnes (mt) assigned to the shipping of material
Milne Port	Western Star Tandem Tractor	A&B	4	68
Milne Port	Ballast Car	A&B	40	920
Milne Port	Ballast conveyor	A&B	4	160
Milne Port	Ballast regulators	A&B	3	135
Milne Port	Car movers	A&B	2	140
Milne Port	Excavator	A&B	5	80
Milne Port	F-550 Mechanic Truck	A&B	1	2
Milne Port	Flashbutt weld trucks	A&B	2	4
Milne Port	Fuel truck	A&B	1	9
Milne Port	highway trailer 40 foot lowbed	A&B	1	4
Milne Port	highway trailer 48 foot	A&B	1	5
Milne Port	Hi-Rail boom truck	A&B	1	14
Milne Port	Kennworth 880 Dump Truck w/ hirail	A&B	1	7
Milne Port	Kennworth 880 w/ winch	A&B	1	8
Milne Port	Kennwoth 370 fuel & lube truck (filled)	A&B	1	8
Milne Port	Knox Kershaw KBR 940 Regulator	A&B	1	18
Milne Port	Mark IV Tamper	A&B	4	30
Milne Port	Mechanics trucks	A&B	1	1
Milne Port	Pettibone 445F w/ high rail	A&B	1	24
Milne Port	Rail car mover	A&B	1	1
Milne Port	Rail deck trailer	A&B	3	6
Milne Port	Speedswings	A&B	4	96
Milne Port	Tandem tractors	A&B	8	8
Milne Port	Telehandler	A&B	1	20
Milne Port	Track Welding Truck	A&B	1	1
Milne Port	Trombone trailers	A&B	6	6
Milne Port	Bridge Crane 55'	ADCO	1	60
Milne Port	400T AT LTM 1400-7.1 - CRANE - Unit #2259 (Orange)	AECON	1	80
Milne Port	400T AT LTM 1400-7.1 - LTM 1350 CRANE (Orange)	AECON	1	80
Milne Port	Cat 938K Loader	AECON	1	70
Milne Port	LR1300 Crawler Crane Unit #2617 (Bleu)	AECON	1	40
Milne Port	TADANO RR1600XL CRANE	AECON	2	70

Property Section	Material Item	Owner	Quantity	Revenue Tonne
e.g. Milne Port or Mine Site	Description of the material*		Quantity of the material to be shipped to and stored on the Property (including unit of measurement)	Estimated amount of revenue tonnes (mt) assigned to the shipping of material
Milne Port	Doosan 900HP Compressors	AECON	6	6
Milne Port	Light Vehicles (F350 or equiv.)	AECON	5	5
Milne Port	Mammoet Frost Fighter Trailer – #601667	AECON	1	4
Milne Port	Man lift – JLG 12000SJ – SN#0300247528	AECON	7	16
Milne Port	BG20H – Pile Driver – #2780	AECON	1	21
Milne Port	Cat 420F2 Loader – HWD03696	AECON	1	70
Milne Port	Ford Fuel truck	AECON	1	2
Milne Port	Telehandler – JCB 512-56S	AECON	3	20
Milne Port	Truck trailers	AECON	2	5
Milne Port	Light Vehicles (F350 or equiv.)	AllNorth	2	2
Milne Port	Pick-up Truck F250 with Crew cab with Class 1 Blaster box	Dyno Nobel	1	1
Milne Port	Bulk emulsion truck – Unit# RC 908	Dyno Nobel	1	3
Milne Port	CAT 906M loader – #194396-01-01	Dyno Nobel	1	70
Milne Port	EBC ACCESSORIES – Heater (Flagro) #2T9T2HB23HS149172	EBC	3	2.4
Milne Port	SD 40 Maintenance Locomotive/Switcher/Car Mover	G&W – ZR001	1	400
Milne Port	65T Crane	GORF	1	110
Milne Port	Tower Light	GORF	12	9.6
Milne Port	JCB 260 Bobcat	GORF	1	1
Milne Port	Welding Machine	GORF	1	0.5
Milne Port	Frost Fighter 400,000 BTU	GORF	1	0.8
Mine Site	Light Vehicles (F350 or equiv.)	GORF	2	2
Mine Site	60' Man Lift	GORF	1	16
Mine Site	Skytrack w Forks	GORF	1	2
Mine Site	Boom Truck	GORF	1	4
Mine Site	Scissor Lift	GORF	1	16
Mine Site	80' Man Lift	GORF	1	16
Milne Port	500 kW Diesel Generator	GORF	4	4
Mine Site	10 Passenger Van	GORF	1	1
Milne Port	Cat Skid Steer 259D	Horizon	1	15
Milne Port	Light Vehicles (F350 or equiv.)	Horizon	2	2
Milne Port	5600i cement mixer	Nahanni	1	30

Property Section	Material Item	Owner	Quantity	Revenue Tonne
<i>e.g. Milne Port or Mine Site</i>	<i>Description of the material*</i>		<i>Quantity of the material to be shipped to and stored on the Property (including unit of measurement)</i>	<i>Estimated amount of revenue tonnes (mt) assigned to the shipping of material</i>
Milne Port	NNL Unit# TBD 130T Crane	NNL/Moreau	1	90
Milne Port	20' Container – Air Compressor	NNL/Moreau	1	18
Milne Port	20' Container – Air Compressor	NNL/Moreau	1	18
Milne Port	20' Container – Scissor Lift & Tools	NNL/Moreau	1	16
Milne Port	Light Vehicles (F350 or equiv.)	NNL/Moreau	2	2
Milne Port	NNL Unit #1468 Skytrack 8000lbs	NNL/Moreau	1	8
Mine Site	14M Grader	Nuna	2	60
Mine Site	374F Excavator	Nuna	2	80
Milne Port	745C truck	Nuna	22	2750
Milne Port	950M Loader	Nuna	2	140
Milne Port	966M Loader	Nuna	2	140
Milne Port	980M Loader	Nuna	3	210
Milne Port	988K Loader	Nuna	2	140
Milne Port	Cat 980K Loader	Nuna	2	140
Milne Port	D8T dozer	Nuna	7	85
Milne Port	Glacier – Sandvik 1500i Drill	Nuna	6	438
Milne Port	CAT 259D Track Loader + Extra Bucket	Nuna	1	70
Milne Port	CAT 289D Track Loader + Extra Bucket	Nuna	2	140
Milne Port	Light Vehicles (F350 or equiv.)	Nuna	14	14
Milne Port	Glacier – Skidsteer	Nuna	4	60
Milne Port	Glacier – Skidsteer Trailer	Nuna	1	15
Mine/Port	Glacier – Skidsteer Trailer	Nuna	1	15
Milne Port	Generator 120KW –	Nuna	1	2
Milne Port	336E Excavator	Nuna	2	80
Mine Site	349F Excavator	Nuna	4	80
Milne Port	Cat 930 Wheel Loader with Forks #FRF00689	Nuna	2	140
Milne Port	Cat CS563 Packer #1508	Nuna	2	30
Milne Port	CS56B	Nuna	1	18
Milne Port	CS78B	Nuna	2	40
Milne Port	D6T dozer	Nuna	2	75
Milne Port	Fuel/Lube Truck	Nuna	1	12
Milne Port	Glacier – Mechanic Truck #TR210	Nuna	1	6
Milne Port	NUNA – F550 Flat Deck/Mechanic Truck	Nuna	11	88

Property Section	Material Item	Owner	Quantity	Revenue Tonne
<i>e.g. Milne Port or Mine Site</i>	<i>Description of the material*</i>		<i>Quantity of the material to be shipped to and stored on the Property (including unit of measurement)</i>	<i>Estimated amount of revenue tonnes (mt) assigned to the shipping of material</i>
Milne Port	NUNA – Hamm 3205 Packer	Nuna	1	32
Milne Port	NUNA – Raw Water Truck Unit #196	Nuna	1	14
Milne Port	NUNA – RO/RO Tank for Truck	Nuna	2	18
Milne Port	NUNA – Welding Truck #1994	Nuna	2	8
Milne Port	745C truck	SANA	3	375
Milne Port	775G Haul Truck	SANA	2	250
Milne Port	988K Loader	SANA	1	70
Milne Port	Drill Sandvic DX-800R – Unit #19-0901	SANA	1	120
Milne Port	Drill Sandvik DI-550 – Unit	SANA	2	280
Milne Port	Grader CAT 14M – Unit #512	SANA	1	60
Milne Port	Grizzly Unit – MASABA Feeder – Portable C120 Jaw Plant	SANA	1	95
Milne Port	KOMATSU HD-605-7 HAUL TRUCK	SANA	8	1000
Milne Port	Wheel loader CAT 908 – #19-0204	SANA	2	140
Milne Port	Wheel loader Komatsu WA500 – Unit #18-0204	SANA	1	70
Milne Port	Wheel loader Komatsu WA600	SANA	3	210
Milne Port	Wheels Loader CAT 982	SANA	1	70
Milne Port	Tower Light	SANA	12	9.6
Milne Port	Frost Fighters	SANA	10	8
Milne Port	Skytrack	SANA	1	1
Milne Port	Light Vehicles (F350 or equiv.)	SANA	20	20
Milne Port	Frosfighter 1000000BTU	SANA	6	4.8
Milne Port	Generators 500 kW	SANA	6	120
Milne Port	Screenner #19-0114	SANA	1	45
Milne Port	1050-Dozer	SANA	1	70
Milne Port	Bus	SANA	2	20
Milne Port	352 Excavator	SANA	3	80
Milne Port	Mack Fuel truck – Unit #11-0113	SANA	1	23
Milne Port	Mechanic Truck – Unit	SANA	3	24
Milne Port	Tridem Tractor #19-0127	SANA	1	13
Milne Port	DX800	Sandvik	1	77
Milne Port	374F excavator	Toromont	1	80
Milne Port	980M loader	Toromont	2	140

Property Section	Material Item	Owner	Quantity	Revenue Tonne
<i>e.g. Milne Port or Mine Site</i>	<i>Description of the material*</i>		<i>Quantity of the material to be shipped to and stored on the Property (including unit of measurement)</i>	<i>Estimated amount of revenue tonnes (mt) assigned to the shipping of material</i>
Milne Port	D8T Dozer	Toromont	4	70
Milne Port	Mobile Fleet- 745C Rock Truck 745C-	Toromont	5	625
Milne Port	Mobile Fleet- 950M Loader	Toromont	2	140
Milne Port	745C Haul truck	Toromont	3	375
Milne Port	950 Loader	Toromont	2	140
Milne Port	Tower Light	Toromont	2	1.6
Milne Port	Light Vehicles (F350 or equiv.)	Toromont	3	3
Milne Port	289 Skid Steer	Toromont	1	15
Milne Port	Service Truck	Toromont	1	4
Milne Port	349F Excavator	Toromont	2	80
Milne Port	988 Loader	Tretan	1	70
Milne Port	Light Vehicles (F350 or equiv.)	Tretan	5	5
Milne Port	Frost fighter flagro	Tretan	2	1.6
Milne Port	500 kW Diesel Generator	Tretan	2	40
Milne Port	Flat deck Trailer	Tretan	10	20
Milne Port	40,000L Fuel Tank Trailer	Tretan	7	161
Milne Port	Kenworth Tractor	Tretan	7	301
Milne Port	Western Star Tractor	Tretan	5	255
Milne Port	WA250 Loader	Tretan	1	70
Milne Port	Kone Reach Stacker	Tretan	1	80
Milne Port	Service Truck	Tretan	1	6

Additional supplies to support construction and operations through 2020 and 2021 will arrive on the 2012 sea lift include:

- Delivery of ammonium nitrate (AN), up to ~~20,125~~ 12,500 m³ (~~16,100~~ 10,000 tonnes) to be stored on-site in 2020;
- ~~Delivery of pre-packaged explosives, up to 176,000 kg to be stored on-site in 2020;~~
- Delivery of maintenance parts; and
- Delivery of consumables (lubricants, grease, detergents, boosters, EZ Dets, dry goods, food, household supplies, etc.).

Attachment 2

Baffinland Responses to SNC Report

Issue/Discrepancy	Description	Recommendations/Requests to BIMC	Baffinland Responses
In 2018 BIMC completed an assessment of five different third-party contractors, including both contractors from outside Nunavut and those registered in Nunavut. The revised labour rate based on updated 2018 contractor input was \$75/hour.	Labour rates derived in the 2014 estimate was \$100/hour based on an average from three different third-party contractors for personnel skilled in several occupations required to carry out the reclamation activities identified.	BIMC to confirm what costs were included in the labour rates from the five third party contractors that were consulted for the 2018 estimate.	SNC confirmed in their December 20 2018 memo to CIRNAC that the unit rate updates completed in 2018 were validated, and agreed to their use. As no further updates to unit rates was completed in 2019, Baffinland maintains that the unit rates derived in 2018 and adopted by SNC and CIRNAC remain valid.
The 2018 estimate mentions a 14 day-on and 14 day-off worker rotation cycle but the actual basis of the estimates are unclear.	The 2014 estimate work week is assumed to be 7 days a week, 10 hours a day for a 21-day duration followed by a rest period.	BIMC to confirm 2018 estimate work week cycle and schedule.	All assumptions from the 2014 Complete Project Financial Security Assessment remain as the basis for the estimate, with the exception of the labour and equipment rates updated in 2018. Labour rates provided by 3rd party contractors in 2018 were provided as hourly, and were independent of rotation or work day. Baffinland maintains that the unit rates derived in 2018 and adopted by SNC and CIRNAC remain valid.
The 2018 labour rate is low compared to 2014 estimate.	The 2014 estimate has a blended labour rate of \$100/hour and included applicable base wage, fringe benefits and burdens, small tools, consumables, personal protective equipment (PPE) and overhead and profit. It is unclear if scheduled overtime is included within all-in rates, given the work week is 70 hours, overtime paid at an overtime rate would be expected.	Complete a confirmatory check that the 2018 estimate labour rate is inclusive of the items listed in the issue description and included in the 2014 estimate.	SNC confirmed in their December 20 2018 memo to CIRNAC that the unit rate updates completed in 2018 were validated, and agreed to their use. As no further updates to unit rates was completed in 2019, Baffinland maintains that the unit rates derived in 2018 and adopted by SNC and CIRNAC remain valid.
In 2018 BIMC assessed three different third- party contractors and revised the equipment rates based on contractor equipment rates obtained to \$125/hour. This rate assumes equipment to be utilized 8 hours per day, 20 days per month at 160 hours per month. This does not align with the assumed work week and rotation from the 2014 estimate.	<p>The 2014 estimate utilized a blended equipment rate of \$150/hour, representative of the variety of equipment required to implement the reclamation activities and includes the cost to operate and maintain the equipment, but exclusive of contractor labour and mobilization/demobilization costs.</p> <p>The 2014 estimate blended equipment rate was calculated based on actual equipment rates from three different contractors. A comparison of individual equipment for heavy equipment reveals that for a 988 loader, the hourly rate obtained for the 2018 estimate is approximately 6% higher than</p>	BIMC to clarify the type of equipment considered in the estimate and to provide information on assumptions on equipment utilization ratios, productivity, or equipment hours within the rates.	SNC confirmed in their December 20 2018 memo to CIRNAC that the unit rate updates completed in 2018 were validated, and agreed to their use. As no further updates to unit rates was completed in 2019, Baffinland maintains that the unit rates derived in 2018 and adopted by SNC and CIRNAC remain valid.

Issue/Discrepancy	Description	Recommendations/Requests to BIMC	Baffinland Responses
Error in Table 4.1 of the Baffinland 2020 Marginal Closure and Reclamation Financial Security Estimate and the 2019 Marginal Closure and Reclamation Financial Security Estimate.	The grand total summary for the 2020 estimate in column "C" and "F" are identical to totals from the 2019 ASR estimate and appear to be an error that does not includes the updated sub totals.	Correct the grand total summaries of Table 4.1 of the Baffinland 2020 Marginal Closure and Reclamation Financial Security Estimate and the 2019 Marginal Closure and Reclamation Financial Security Estimate.	Baffinland notes the error in the grand totals depicted in Column C and F, Row 21, and will revise and update accordingly in Revision 1 of the 2020 Marginal Closure and Reclamation Financial Security Estimate.
There is difficulty involved with separating the costs that BIMC presented as a blend of elements common to Phase 1 and Phase 2 project development.	The BIMC 2020 Work Plan includes several activities that require a Project Certificate and will be performed after Post-Project Certificate for Phase 2. Those works are planned based on anticipated approval of Phase 2, but this will not proceed until all relevant approvals are obtained.	It is recommended that BIMC present the Phase 2 items separately so that CIRNAC may assess the cost implications more clearly.	To the extent possible, Baffinland has presented items that require issuance of the amended Project Certificate for Phase 2 in both the 2020 Work Plan and the 2020 Marginal Closure and Reclamation Financial Security Estimate.
BIMC has listed an indirect cost of 3.9% for engineering costs, this should be validated due to the stage of project.	It is unclear at what costs have been considered or included in this 3.9%.	It is recommended that BIMC provide a detail of the items included in the engineering costs.	From the 2014 Complete Project Financial Security Assessment; <i>In the event of bankruptcy and closure, it is expected that only limited additional site characterization will be needed to develop the engineering specifications and drawings required for contracting. This is attributed to the relatively straightforward nature of the reclamation activities required and the level of information already available. Mainly, the reclamation program will be predominantly an earthworks exercise with a simple demolition contract and therefore a relatively simple engineering scope. This would indicate high allowances for additional engineering and redesign costs are not required.</i>

Issue/Discrepancy	Description	Recommendations/Requests to BIMC	Baffinland Responses
BIMC has listed an indirect cost of 9.4% for Project management costs, this should be validated due to the stage of project.	It is unclear at what costs have been considered or included in this 9.4%.	It is recommended that BIMC provide a detail of the items included in the Project Management costs.	From the 2014 Complete Project Financial Security Assessment; <i>This assumption is based on the Ontario Society of Professional Engineers (OSPE, 2012) fee guideline for construction projects costing more than \$10,000,000. Project supervision, management and contract administration indirect costs include, but are not limited to:</i> <ul style="list-style-type: none"> • Contract strategy, administration and expediting; • Construction logistics, planning, scheduling, supervision and manpower forecasts; • Labour relations, safety; • Field office management, temporary facilities; • Materials receiving and warehousing; • Progress monitoring, trending and reporting; • Cost performance monitoring, trending and claims processing; and • Quality assurance.
BIMC currently adjusts their closure costs in a different model annually.	The EBS model provided by BIMC does not contain the logic based on which the different cost summaries are presented within the annual report. This makes the process difficult for the reviewer to establish accuracy or consistency throughout the	It is preferred that BIMC present their closure estimate following the items in RECLAIM format for improved accuracy and clarity.	Baffinland developed the EBS in consultation with QIA based on a first principals approach, as QIA does not accept the use of RECLAIM for inuit owned land liabilities. Baffinland presents it's estimate to all parties using the EBS model on an annual basis.
Waste Pile Rock Design Amendments			
Geochemical tests ongoing for evaluation of Waste Rock pile	Geochemical results will be available on December 31 st , 2019.	Waste rock management plan and operations should promptly be reviewed and validated to minimize the time of waste rock exposure and oxidation according to the results of the waste rock analysis to be available on December 31, 2019.	Regulators will be provided with the updated Waste Rock Management Plan on December 31, 2019.

Issue/Discrepancy	Description	Recommendations/Requests to BIMC	Baffinland Responses
Waste Rock Management Plan and ICRP have not been updated	Closure cost should be based on other reclamation concepts (as a cover) until the Baffinland mine could validate that they could manage ARD and metals leaching with their waste rock management plan. Validate geology and geochemistry of waste rocks and rock pile closure design (based on permafrost), considering the updated thermal model.	The Waste Rock Management Plan and the ICRP should be updated according to Geotechnical and Geochemical results to become available on December 31 st 2019.	Regulators will be provided with the updated Waste Rock Management Plan on December 31, 2019. Baffinland continues to work with QIA on updates to the ICRP, no update is available at this time.
Prevention of Fugitive dust	Fugitive dust settling must be prevented as a minimum for site reclamation and a cover layer should be validated as well and included in closure cost.	Update this item in the ICRP and include in the cost estimate.	It is noted that the primary sources of dust (ore crushing, ore stockpiling, and ore transport) will no longer be in operation at closure, and therefore negligible contribution to air quality. Air quality monitoring is included as a Post Closure Monitoring activity in the ICRP and is included in the reclamation security estimate. Refer to Section 9.11 of the ICRP for more detail.
Long term criteria for permafrost conditions	Review long term design criteria of BIMC according to state of the art and other mine sites in permafrost conditions, and/or regarding ARD characterization.	Update these items in the ICRP and include in the cost estimate.	The ICRP outlines the closure objective to ensure mine areas are physically stable for use by humans and receiving environment. Inspection criteria and will be refined based on the post closure stability assessment for remaining mine structures and Final Grading Plan. Refer to Table 5.1 in the ICRP for more detail. There is no impact on the reclamation security estimate as geotechnical monitoring is included in the post closure monitoring program.
Studies and instrumentation	Cost for studies and instrumentation not in place yet or needed at the end of mine operations at Baffinland site should be added to the security estimate.	Include cost for studies and instrumentation at the end of mine operations	Geotechnical engineering monitoring is outlined in Section 9.4 of the ICRP, which includes stability, erosion and permafrost analyses and monitoring. There is no impact on the reclamation security estimate as geotechnical monitoring is included in the post closure monitoring program.

Issue/Discrepancy	Description	Recommendations/Requests to BIMC	Baffinland Responses
Rock pile footprint	It has been assumed that 190,000 m ² footprint is the ultimate end-of- life footprint and already incorporates the proposed increase in mined volume. If this is not the case, the quantity should be updated to reflect the new footprint.	Confirm or update the assumed end-of- life rock pile footprint.	The footprint for the Waste Rock Facility (WRF) currently allocated in the EBS is 320,000 m ² excluding the WRF pond, or 395,000 m ² including the WRF pond. From the March 2019 Interim Waste Rock Management Plan prepared by Golder, the total catchment area of the WRF, including the WRF pond, for the 2019/2020 expansion is 358,000 m ² . Construction of the second phase expansion of the WRF is currently not proposed until 2021. Therefore there are sufficient reclamation securities in place for the footprint of the WRF.

**Baffinland Response to SNC Table 5-2
2020 Annual Security Review**

BIMC Report Reference	Item Description	Discrepancy between Report and EBS	Comment	Baffinland Response
Table 2-4	Screen Metso FS353	BIMC Report Quantity: -1 EBS 2020-R Quantity: 2	EBS quantity carried to RECLAIM. BIMC to clarify.	Report quantity is accurate, EBS quantity has been updated to reflect correct value (-1).
	D8T Dozer	BIMC Report Quantity: 3 EBS 2020-R Quantity: 1	EBS quantity carried to RECLAIM. BIMC to clarify.	EBS quantity is accurate, report will be updated to reflect correct value (1).
	Genie Manlift z60	BIMC Report Quantity: -2 EBS 2019 Quantity: 2	Estimate quantity not represented in EBS for 2020/2020-R. BIMC to clarify.	Report quantity is accurate, EBS has been updated to add correct value (-2).
	Genie Manlift s135x	BIMC Report Quantity: -3 EBS 2019 Quantity: 3	Estimate quantity not represented in EBS for 2020/2020-R. BIMC to clarify.	Report quantity is accurate, EBS has been updated to add correct value (-3).
	Light Plants	BIMC Report Quantity: -21 EBS 2020 Quantity: 19	Estimate quantity not represented in EBS for 2020/2020-R. BIMC to clarify.	Report quantity is accurate, EBS has been updated to add correct value (-21).
	Generator/Air Compressor	BIMC Report Quantity: -1 EBS 2019 Quantity: 2	Estimate quantity not represented in EBS for 2020/2020-R. BIMC to clarify.	Report quantity is accurate, EBS has been updated to add correct value (-1).
	3 rd Party Heavy Mobile Equipment	BIMC Report Quantity: -11	Estimate quantities not represented in EBS for 2020/2020-R. BIMC to clarify.	EBS quantities under 2020-R updated to include backhaul values. EBS total = 49
	3 rd Party Medium Mobile Equipment	BIMC Report Quantity: -6		EBS quantities under 2020-R updated to include backhaul values. EBS total = 61
	3 rd Party Light Mobile Equipment	BIMC Report Quantity: -31		EBS quantities under 2020-R updated to include backhaul values. EBS total = 34
Table 3-3	The quantities for 3 rd Party Heavy Mobile Equipment and 3 rd Party Light Mobile Equipment are the opposite of what is reported in the EBS.	In BIMC Report: 3 rd Party Heavy: 265 3 rd Party Light: 109 In EBS Work Plan 2020: 3 rd Party Heavy: 109 3 rd Party Light: 265	The EBS numbers were used in the RECLAIM model. BIMC to confirm quantity value to be carried into RECLAIM.	EBS quantities are accurate, confirmed as follows: 3rd Party Light = 265 3rd Party Medium = 230 3rd Party Heavy = 109

**Baffinland Response to SNC Table 5-2
2020 Annual Security Review**

BIMC Report Reference	Item Description	Discrepancy between Report and EBS	Comment	Baffinland Response
Table 3-4	Quarry PQ14B	BIMC Report Quantity: 110,000 m ² EBS 2020 Quantity: 111,000 m ²	The EBS numbers were used in the RECLAIM model. BIMC to confirm quantity value to be carried into RECLAIM.	Report quantity is accurate, EBS value updated to 110,000 m ² .
Table 3-6	Light Tank	BIMC Report Quantity: 4 EBS 2020 Quantity: -4	The EBS numbers were used in the RECLAIM model. BIMC to confirm quantity value to be carried into RECLAIM.	From the backhaul manifests, Baffinland removed 4 water tanks, as well as 3 light diesel tanks. These were included in the EBS (under 2020-R) but not in the report text, which will be updated to include the backhauled tanks. The addition of 4 water tanks in 2020 was missing from the EBS, and has now been added.
Table 3-9	Fill Application for 2020 Estimate	BIMC Report Quantity: 5170 EBS 2020 Quantity: 5951	The EBS numbers were used in the RECLAIM model. BIMC to confirm quantity value to be carried into RECLAIM.	With the above adjustments to the EBS the fill application is 5,698 m ² for 2020/2020-R. Note this value will be adjusted based on the revised Work Plan.