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NUNAVUT WATER BOARD
NUNAVUT IMALIRIYIN KATIMAYINGI
OFFICE DES EAUX DU NUNAVUT

File No. 2AM-MRY1325 / F3

February 7, 2020

Christopher Murray
Environmental & Regulatory Compliance Manager
Baffinland Iron Mines Corporation
Suite 300 – 2275 Upper Middle Road East
Oakville, Ontario, Canada L6H 0C3

Email: christopher.murray@baffinland.com

RE: Licence No. 2AM-MRY1325 Type “A”; Mary River Project, Baffinland Iron Mines Corporation; Phase 1 Waste Rock Management Plan – NWB Review

Dear Mr. Murray:

The Nunavut Water Board (NWB or Board) is pleased to provide its comments on the *Phase 1 Waste Rock Management Plan* (Plan) dated December 31, 2019 and submitted by Baffinland Iron Mines Corporation (Baffinland or Licensee) as per requirement under Part F, Item 3 of its Type “A” Water Licence No. 2AM-MRY1325 (Licence).

The Plan was distributed for public review on January 6, 2020. Comment submissions were received from Crown-Indigenous Relations and Northern Affairs (CIRNA) and the Qikiqtani Inuit Association (QIA) on February 5, 2020.

Copies of all documents received during the review of Plan can be accessed through the NWB’s Public Registry and FTP site using the following link:

[ftp://ftp.nwb-oen.ca/registry/2%20MINING%20MILLING/2A/2AM%20-%20Mining/2AM-MRY1325%20BIMC/3%20TECH/4%20WASTE%20DISP%20\(F\)/F%203%20Waste%20Rock%20Mgmt%20Plan/](ftp://ftp.nwb-oen.ca/registry/2%20MINING%20MILLING/2A/2AM%20-%20Mining/2AM-MRY1325%20BIMC/3%20TECH/4%20WASTE%20DISP%20(F)/F%203%20Waste%20Rock%20Mgmt%20Plan/)

By copy of this letter, the NWB provides its comments and information requests pertaining to the Plan in the table below.

Table 1. The NWB Information Requests

Issue No.	Reference	Issue / Information Request
1	Plan Section 8.2	Under the point titled “Lift thickness”, Baffinland commits to

	Deposition Strategy and Guidelines	“regularly inspect the waste rock lift advancement for signs of material segregation”. The NWB requests that the frequency of such inspections as well as responsible persons be outlined in the document.
2	Same as above	The last paragraph of the section states, “...in the near-term until the WRF footprint can be sufficiently expanded, waste rock deposition following the above guidelines may not always be possible.” The NWB requests further clarification on the deviations from the deposition strategy outlined in the Plan and any risk mitigation measures that Baffinland intends to take in the case of such deviations.
3	Plan Section 9 WRF Water Management	The reference source is missing on p. 18. The NWB requests updating the reference.
4	Plan Section 10 Monitoring	The NWB requests that the monitoring schedule and parameters be included in this section. It is the Board’s opinion that the Plan ought to inform Baffinland’s responsible personnel on the proper operation of the waste rock storage facilities. Thus, outlining monitoring requirements or, at a minimum, how to locate them is essential for inclusion in the Plan.
5	Waste Rock Management Plan for 2020 through 2021, Section 5.3 Thermal Model Results	In this section, Golder Associates Ltd. recommends, “(d)elaying winter deposition or reducing the thickness of summer deposition would decrease freezing times and reduce the extent of thawed portions within the WRF.” The NWB requests that Baffinland confirm if it intends to follow the recommendation.
6	Waste Rock Management Plan for 2020 through 2021 Section 6.0 Water Balance	The NWB requests that Baffinland confirm if it intends to take measures to collect accurate water balance data. If so, please outline the measures and the corresponding timeline.
7	Waste Rock Management Plan for 2020 through 2021 Section 7.0 Water Quality Model	Considering the statement in Issue No. 2 of this Table, the NWB requests that Baffinland clarify if the provided water quality model takes into account possible deviations from the deposition strategy.
8	Waste Rock Management Plan for 2020 through 2021 Section 10.0 WRF Development Strategy	The last paragraph of this section repeats the statement quoted in Issue No. 2 of this Table. The NWB requests that Baffinland clarify in the Plan the deviations from the suggested deposition strategy, especially given the fact that the Plan includes a separate <i>Waste Rock Management Plan for 2020 through 2021</i> (dated December 31, 2019).
9	Phase 1 Waste Rock Management Plan dated December 31, 2019; entire Plan	Baffinland should provide a clarification on how it integrates the effects of climate change into the Plan.

The Board requests that the Licensee provide its response, on or before **February 21, 2020**, to the issues:

- 1) outlined in this letter and
- 2) provided in the submissions from CIRNA and the QIA.

If you have any questions, please contact the undersigned at assol.kubeisinova@nwb-oen.ca or (867) 360 6338 (ext. 31).

Best regards,

Assol Kubeisinova
Nunavut Water Board
Technical Advisor

Enclosure: Comments – CIRNA, QIA

Cc: Distribution List – Mary River