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NUNAVUT WATER BOARD
NUNAVUT IMALIRIYIN KATIMAYINGI
OFFICE DES EAUX DU NUNAVUT

File: 2AM-MRY1325 / B14, F3

August 17, 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

Subject: Waste Rock Management Plan Rev 3; Type “A” Water Licence No: 2AM-MRY1325, Mary River Project; Baffinland Iron Mines Corporation

Dear Christopher Murray:

On June 16, 2020, the Nunavut Water Board (NWB or Board) acknowledged the receipt of the *Phase 1 Waste Rock Management Plan Rev 3* (Plan) from Baffinland Iron Mines Corporation (Baffinland or Licensee) as per the requirements of Part B, Item 14 and Part F, Item 3 of Water Licence No: 2AM-MRY1325 (Licence). The Plan was provided with revisions as requested by the NWB in its April 20, 2020 correspondence associated with the review of *Phase 1 Waste Rock Management Plan Rev 2* dated December 31, 2019.

The NWB distributed the Plan for public review with a deadline for submissions set for July 16, 2020. Comments were received from Crown-Indigenous Relations and Northern Affairs (CIRNA) and the Qikiqtani Inuit Association (QIA)¹.

The QIA notified the Board that all concerns had been addressed.

CIRNA recommended Baffinland to:

- Revise section 9.2 “WRF [Waste Rock Facility] Runoff Water Treatment Alternatives” to discuss actual site water management issues at the Waste Rock Facility and the Licensee’s plans to address them;
- Calibrate the water balance model for the Waste Rock Facility and update the Waste Rock Facility pond water quality predictions; and

¹ Crown-Indigenous Relations and Northern Affairs (CIRNA), dated July 16, 2020; Qikiqtani Inuit Association (QIA), dated July 16, 2020.

- Discuss the work done on the water balance model so far and provide the timeline for its update.

The Licensee responded to CIRNA's information requests with additional information on July 30, 2020:

- A water treatment plant is currently employed at the Waste Rock Facility pond;
- Information on the water treatment plant is provided in the *Waste Pond Water Treatment Plant Operations* dated August 17, 2018 and appended to the Plan;
- Solids produced at the Waste Rock Facility pond water treatment plant are collected in geotubes and disposed as Potentially Acid Generating material;
- Sludge removal procedures are included in the Plan;
- Data necessary for the calibration of the water balance model is still being collected. "Data from the 2020 season will be collected and utilized in the update to the Water Balance Model in spring 2021, concurrent with the next revision to the WRMP currently scheduled for submission in June 2021"; and
- A pressure transducer for the Waste Rock Facility pond and a totalized for discharge from Deposit 1 were procured.

On August 10, 2020, CIRNA stated² that it "... appreciates the response from Baffinland and their commitment to collect more data for updating their water balance model. CIRNAC is looking forward to a review of this model when it has been updated."

Copies of all documents received during the review of the 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/)

The NWB reviewed the Plan in the context of interveners' comments and recommendations and the Licensee's clarifications and commitments. Therefore, by way of this correspondence and in accordance with Motion No: 2020-A1-004, the Board approves the document entitled *Phase 1 Waste Rock Management Plan Rev 3* dated June 16, 2020. The Licensee is advised that the Plan can be implemented upon the issuance of this letter by the Board.

Should you have any questions, please feel free to contact the undersigned at (867) 360-6338 (ext. 31) or assol.kubeisinova@nwb-oen.ca at your earliest convenience.

Regards,



Assol Kubeisinova

² Godwin Okonkwo (CIRNA) to Assol Kubeisinova (NWB), RE: 200731 2AM-MRY1325 Baffinland Response to Comments - WRMP Rev 3 - Mary River Mine Site - Qikiqtani Region, dated August 10, 2020.

Technical Advisor
Nunavut Water Board

cc: Distribution List – Mary River