



Water Resources Division
Resource Management Directorate
Nunavut Regional Office
P.O. Box 100
Iqaluit, NU, X0A 0H0

Your file - Votre référence
2AM-MRY1325
Our file - Notre référence
CIDM# 1286549

July 2, 2020

Robin Ikkutisluk
Licensing Administrator
Nunavut Water Board
P.O. Box 119
Gjoa Haven, NU, X0B 1J0
E-mail: licensing@nwb-oen.ca

**Re: Crown-Indigenous Relations and Northern Affairs Canada Review Comments
for the Issued for Construction Drawings Submission for the Mine Site
Landfarm at the Mary River Project, Water Licence No. 2AM-MRY1325 –
Amendment No. 1**

Dear Ms. Ikkutisluk,

Thank you for your June 18, 2020 invitation to review the referenced Issued for Construction Drawings Submission for the Mine Site Landfarm for the Mary River Project, Water Licence No. 2AM-MRY1325 – Amendment No. 1, submitted by Baffinland Iron Mines Corporation.

Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC) examined the response pursuant to CIRNAC's mandated responsibilities under the *Nunavut Waters and Nunavut Surface Rights Tribunal Act* and the *Department of Crown-Indigenous Relations and Northern Affairs Act*. Comments have been provided in the attached Technical Memorandum.

If there are any questions or concerns, please contact me at (867) 975-4282 or bridget.campbell@canada.ca.

Sincerely,

Bridget Campbell,
Water Resources Coordinator



Technical Review Memorandum

Date: July 2, 2020

To: Robin Ikkutisluk – Licensing Administrator, Nunavut Water Board

From: Bridget Campbell – Water Management Coordinator, CIRNAC

**Subject: Crown-Indigenous Relations and Northern Affairs Canada Review
Comments for the Issued for Construction Drawings Submission for the
Mine Site Landfarm at the Mary River Project, Water Licence No. 2AM-
MRY1325 – Amendment No. 1**

Region: ☐ Kitikmeot ☐ Kivalliq ☒ Qikiqtani

A. BACKGROUND

Baffinland Iron Mines Corporation (BIMC) currently operates the Mary River iron ore mine in Nunavut, Canada. The Mary River Project is licensed under Nunavut Water Board Licence No. 2AM-MRY1325 – Amendment No. 1. Construction criteria are outlined under Part D of the licence.

BIMC submitted a letter to the NWB notifying them of BIMC's intention to build an approved landfarm at the Mine Site. The letter notes that adequate reclamation securities have been posted for this infrastructure, which Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC) can confirm was assessed in the Annual Security Review. The letter also notes that the location of the landfarm has shifted from the layout approved in Modification No. 10. The letter was accompanied by a Design Brief and For-Construction Drawings from Knight Piésold Ltd. (KP).

CIRNAC reviewed this submission. A summary of the subjects of recommendations can be found in Table 1. A summary of the documents reviewed can be found in Table 2 of Section B. Detailed technical review comments are provided in Section C. References are listed in Section D.

Table 1: Summary of Recommendations

Recommendation	Subject
R-01	Implications for Landfill Capacity



B. DOCUMENTS REVIEWED

The following table (Table 1) provides a summary of the documents reviewed.

Table 2: Documents Reviewed

Document Title	Author, File No., Date
Letter to the Nunavut Water Board Re: Issued for Construction Drawings Submission - Mine Site Landfarm Mary River Project - Type 'A' Water Licence 2AM-MRY1325 - Amend. No. 1	Christopher Murray, Baffinland Iron Mines Corporation, 2020-06-17
Attachment 1: Design Brief & For-Construction Drawings	Knight Piésold Consulting Ltd., NB102-00181/57-A.01, 2020-03-16

C. REVIEW COMMENTS

1. Implications for Landfill Capacity

Comment:

Baffinland Iron Mines Corporation notes that the landfarm location has been altered from its original design. According to the application for Modification No. 10 (BIMC, 2018) *Drawing 100, Rev 0 – Landfill Expansion – Site Plan*, the landfarm was originally planned to be built in what was called cell 5. The Design Brief and For-Construction Drawings show the new location of the landfarm in what the application for Modification No. 10 refers to as Cell 3 (see Figure 1 for screen capture of Drawing 100, Rev 0 – Landfill Expansion – Site Plan).

The reasons for this change were stated by BIMC as follows: “Detailed design identified that the grades in the original location identified in the Modification No. 10 submission would not be appropriate.”

It is not clear whether the area of Cell 5 has also been deemed not appropriate for landfill construction. Further, now that the extents of the landfarm will be changed and the original Cell 3 of the landfill will be used for the landfarm, it is not clear what the implications will be for the capacity and physical extents of the landfill.

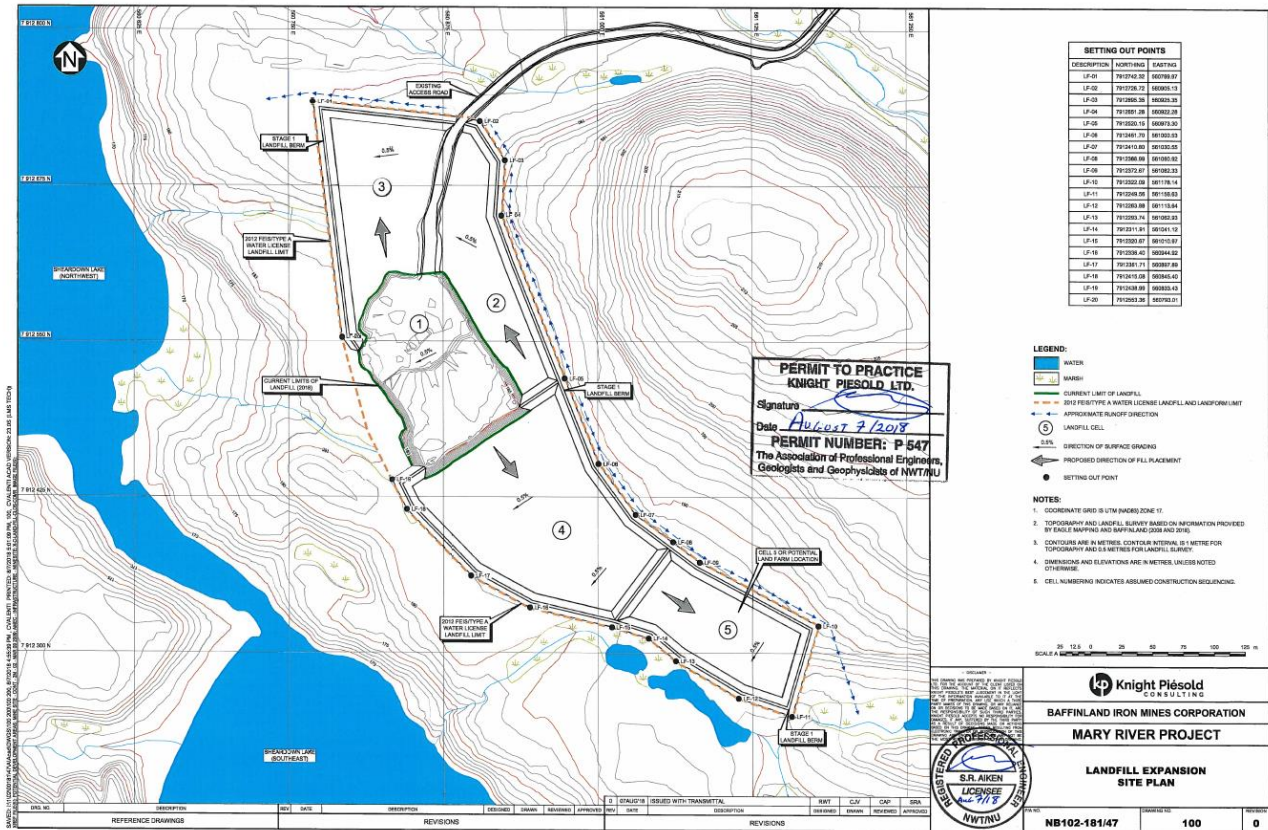


Figure 1: Screen Capture of Drawing 100, Rev 0 – Landfill Expansion – Site Plan

Recommendation:

(R-01) CIRNAC recommends that BIMC clarify the effects or implications that the change in landfarm location will have on landfill footprint and capacity.

D. REFERENCES

Baffinland Iron Mines Corporation. *Letter to the Nunavut Water Board Re: Modification No. 10 - Upgrades at the Mary River Mine Site, Mary River Project, Water Licence 2AM-MRY1325 - Amendment No. 1.* September 5, 2018.