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X0A 0H0

Sanirajak

July 21, 2020

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

Christopher Murray
Environmental Regulatory and Compliance Manager
Baffinland Iron Mines Corporation
2275 Upper Middle Road East, Suite 300
Oakville, ON
L6H 0C3

RE: QIA Updated Response to Baffinland's 200618 2AM-MRY1325 - Submission of Construction Notification and IFC Submission - Mine Site Landfarm

Dear parties,

The Qikiqtani Inuit Association (QIA) provides this updated response to the Nunavut Water Board's (NWB) and Baffinland Iron Mines Corporation (BIMC) regarding BIMC's response to comments on the Mine Site Landfarm Issued for Construction Drawings¹.

1. Contravention of IIBA Section 15.10.4

QIA has agreed to work with BIMC to develop a list of specific regulatory filings that are included in the intended scope of 15.10.4. If a future contravention occurs, QIA will identify the issue for relevant parties.

2. Security Estimate for the Mine Site Landfarm

QIA is satisfied with BIMC's response.

3. Determination of Cell Storage Capacity

QIA is satisfied with BIMC's response.

4. Geological and Hydrogeological Considerations

QIA requests that the Construction Summary Report include confirmations of the bedrock geology, surficial geology, permafrost conditions, and groundwater flow dynamics assessments detailed in the Knight Piésold report².

5. Analogous Lined Facilities

QIA requests that BIMC confirm what monitoring (e.g., groundwater) will be completed to confirm liner integrity. Furthermore, what action levels and thresholds would trigger additional mitigation should contaminants be identified. This may be included in the

¹ Baffinland (2020). [Letter] RE: Response to Comments on the Issued for Construction Drawings – Mine Site Landfarm. Mary River Project, Type ‘A’ Water Licence – 2AM-MRY1325 – Amendment No. 1. July 13, 2020.

² Knight Piésold (2020). Mary River Project – Mine Site Landfarm – Design Brief and IFC Drawings. June 16, 2020.



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construction summary report and could be added to the AEMP during the adaptive management ICA work.

6. Construction and Post-Construction Monitoring

Refer to QIA-5.

7. Commercial Lease Operations Guide

QIA is satisfied with BIMC's response.

Sincerely,

Chris Spencer
Manager, Regulatory Affairs