



August 16, 2024

Nidhi Singh
Technical Advisor, NWB
P.O. Box 119
Gjoa Haven, NU X0B 1J0

RE: Request for NWB Approval of Change to Frequency of 2024 Geotechnical Inspections

Under Part D, Item 18 of Baffinland Iron Mines Corporation's (Baffinland) Type "A" Water Licence 2AM-MRY1325 Amendment No. 1 (Water Licence), Baffinland is required to conduct biannual geotechnical inspections of specified Mary River Project (the "Project") infrastructure, unless otherwise approved by the Board. Part D, Item 18, of the Water Licence states that:

"The Licensee shall conduct inspections of the earthworks and geological and hydrological regimes of the Project biannually during the summer **or as otherwise approved by the Board in writing**. The inspection shall be conducted by a Geotechnical Engineer and the inspection report shall be submitted to the Board within sixty (60) days of the inspection, including a cover letter from the Licensee outlining an implementation plan to respond to the Engineer's recommendations."

In this letter, Baffinland is requesting written approval from the NWB under part D, Item 18 to complete one annual inspection and report in 2024 (rather than two) and also move to annual inspections in subsequent years.

As background, the inspections have been carried out twice a year by a Geotechnical engineer since 2015. The inspection is completed on engineered facilities designed to contain water or waste including pit walls, quarries, landfills, landfarms, bulk fuel storage facilities, sediment ponds, collection ponds and polishing waste stabilization ponds.

However, we are advised by our external third party engineers that there is no technical reason an annual inspection would not be sufficient, and that annual inspections are the standard throughout the mining industry.

Annual geotechnical inspections are also the standard for operating mines in Nunavut. Baffinland has reviewed several licences issued to Agnico Eagle Mines Limited by the NWB; specifically the Meliadine Gold Project (2AM-MEL1631), the Whale Tail Pit Project (2AM-WTP1826), and the Meadowbank Gold Mine (2AM-MEA1525), and all have the requirement for an **annual geotechnical inspection** to be carried out by a Geotechnical Engineer, between the months of July and September.

Finally, the short timelines within the end of June to September for the completion of the two inspections, finalization of the Geotechnical Engineer's Report and cover letter outlining an implementation plan to address any recommendations of the Geotechnical Engineer are not practical and are ineffective in addressing any identified concerns or issues at these facilities from the first inspection to the second one. Conditions such as weather, freshet, snow cover and snow melt often compromise the quality and effectiveness of the first or second inspection in an attempt to complete two meaningful inspections in one summer season.

The 2024 Geotechnical Inspection will be completed to ensure that if any immediate short term issues were identified they could still be addressed in a timely manner as outlined in an implementation schedule as per Part D, Item 18 of the Licence.

Thank you for the consideration of this request; should you have any questions, please do not hesitate to contact the undersigned.

Regards,



Connor Devereaux
Environmental Manager

Cc: Karén Kharatyan (NWB)
Conor Goddard (QIA)
Omer Pasalic, Sean Noble-Nowdluk, Jeremy Fraser (CIRNAC)
Tim Sewell, Megan Lorde-Hoyle, Lou Kamermans, Francois Gaudreau, Martin Beausejour, Todd Swenson, Jerad Nadin, Allison Parker, Dale Kristoff (Baffinland)