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August 07, 2018

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Resolute Bay

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Karén Kharatyan
Director Technical Services, Nunavut Water Board
P.O. Box 119
Gjoa Haven, NU. X0B 1J0

Re: Notification of Planned Construction Work Mary River Mine Site Fuel Storage Facility and 15 ML Arctic Diesel Tank Mary River Project - Type 'A' Water Licence - 2AM-MRY1325 - Amend. No.1

Dear Mr. Kharatyan,

This letter presents the Qikiqtani Inuit Association's (QIA) response to the Nunavut Water Board's (NWB) request¹ for interested parties to ask questions or provide comments regarding Baffinland Iron Mines Corporation's (Baffinland) Notification of Planned Construction Work for a fuel storage facility and a 15 ML Arctic Diesel Tank within the same facility at the Mary River Mine Site submitted by Baffinland on August 1, 2018². The NWB requested that questions or comments be submitted by August 10, 2018.

As the Designated Inuit Organization for the Qikiqtani region, QIA and Baffinland signed the Commercial Lease No. Q13C301³ (the Lease) for the Mary River mine in 2013. QIA's questions or comments presented below are focused on items as they relate to the Lease and its duties to administer Inuit Owned Lands.

QIA has the following questions and comments related to the notification:

1. As stated in the notification, Baffinland intends to commence construction on or before August 15, 2018. Does this schedule provide adequate time for the NWB, QIA and other interested parties to review and accept the final design and for constructions drawings as per Part D, Item 2 of the water licence issued to the Project.

¹ NWB (2018). 180801 2AM-MRY1325 Submission of Mine Site Fuel Notification (BIMC) Qikiqtani Region-ILAE. Sent by Ida Porter on August 1, 2018.

² Baffinland (2018). RE: Notification of Planned Construction Work Mary River Mine Site Fuel Storage Facility and 15 ML Arctic Diesel Tank Mary River Project - Type 'A' Water Licence - 2AM-MRY1325 - Amend. No.1, August 1, 2018.

³ QIA and BIMC (2013) Commercial Lease No.: Q13C301. September 6, 2013.



Sanikiluaq

2. Adequate reclamation security – Baffinland in their notification does not address the fact that adequate security for the proposed development has not been posted with the QIA. QIA request that this be addressed prior to any construction activities.
3. Baffinland does not completely address the fact that the construction of the proposed containment berm and the storage of an additional 15 ML Arctic diesel fuel on site is within the approved scope of the Project and volume of fuel approved by the Nunavut Impact Review Board (NIRB) under Project Certificate No. 005. A confirmation letter from the NIRB may be required.
4. Environmental monitoring of construction activities has not been included in the notification. Environmental monitoring should be further detailed based on the planned activities to ensure no unforeseen environmental impacts occur.
5. Baffinland states that no significant updates will be required to any management plans. If Baffinland does not consider any relevant management and monitoring plans require changes, QIA recommends supporting this assumption with relevant analyses.
6. Baffinland's design brief does not provide construction QA/QC specifications and geomembrane installation specifications required to ensure the construction is completed according to the design intent and to an acceptable standard. Specifically, the design is missing a quality assurance and quality control for material placements, construction density and water content requirements. Specifications are to be signed and stamped by a Professional Engineer. The results of said QA/QC monitoring and installation data are to be provided in the construction summary report.

QIA is willing to further discuss the items identified in this letter with Baffinland and associated Lease obligations at a mutually agreeable time.

Sincerely,

Q. 10

Fai Ndofor
Regulatory Manager