February 19, 2019

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Assol Kubeisinova **Technical Advisor** Nunavut Water Board,

Mary River Project – Notification of Construction – Mine Haul Road and Cross Cut.

Dear Ms. Kubeisinova,

Gjoa Haven, NU X0B 1J0

This letter represents the Qikiqtani Inuit Association's (QIA's) response to the Nunavut Water Board's (NWB's) request¹ for interested persons/parties to review and make representations to Baffinland Iron Mine Corporation's (Baffinland's) Notification of Construction Work for the Mine Haul Road and Cross Cut submission² (Notification). The NWB requested responses be submitted by February 19, 2019.

QIA notes that the current submission was originally included within the NWB's Modification Request No. 7³. Upon review of the Notification, QIA will like to highlight the following concerns.

1. The For Construction drawings provided in the Notification are different from those provided in previous correspondences with the NWB. The original For Construction drawings were authored by Golder showing the culverts being upgraded or replaced in the Mine Haul Road. Further, Baffinland authored a drawing showing the layout of culverts and the Mine Haul Road. Drawings in the Notification are authored by McElhanney Consulting Services ltd. QIA is unclear how the different sets of drawings relate.

NWB (2019). Email titled: 190212 2AM-MRY1325 Distribution Review & Comment Request Notification of Construction Work Qikiqtani Region-OLAE. Sent by Ida Porter. February 12, 2019. ² Baffinland (2019). Notification of Planned Construction Work Mary River Mine Haul Road and Cross Cut, Mary River Project - Type 'A' Water Licence - 2AM-MRY1325 - Amend. No. 1. February 12, 2019. ³ Baffinland 2018. Mary River Project - Modification Request No. 7 – 2018 Upgrades at the Mine Site and Milne Port (Water Licence 2AM-MRY1325 - Amendment No. 1). March 8, 2018



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- 2. Monitoring during construction remains a QIA concern. QIA repeats from their August 1, 2018 submission⁴ that "monitoring during construction will be limited to visual inspections and the following of operational plans. There remains a gap in what will be monitored during construction to demonstrate that the design requirements are achieved. An example of what would partially achieve satisfactory construction monitoring would be QA/QC monitoring of construction materials at a set frequency."
- 3. QIA is uncertain the level of detail provided in the For Construction drawings in the previous and this submission will adequately capture what was designed compared to what was constructed as intended in Schedule D and the Lease Operations Guide for Construction Summary Reports.

QIA is willing to discuss this letter and the Lease obligations with you and your staff at a time that is mutually agreeable.

Sincerely,

Fai Ndofor

Regulatory Manager

⁴ QIA (2018). Response to Comments-Mary River Project-2018 Work Plan-Modification Request No.7 Type 'A' Water Licence-2AM-MRY1325-Amend. No.1. August 1, 2018