

Ida Porter <ida.porter@nwb-oen.ca>

Mary River Project - Modification No. 10 - Mine Site Upgrades - Email 1 of 2

Christopher Murray <christopher.murray@baffinland.com>

Fri, Sep 7, 2018 at 8:12 PM

To: Assol Kubeisinova <assol.kubeisinova@nwb-oen.ca>

Cc: Licensing Department < licensing@nwb-oen.ca>, Megan Lord-Hoyle < megan.lord-hoyle@baffinland.com>

Hello Assol,

I have provided responses to your inquiries below in red, please let me know if you need any additional clarification on any of these items.

Thank you,

Christopher Murray | Environmental & Regulatory Compliance Manager Oakville - 2275 T: +1 416 364 8820 x5072 C: +1 647 472 9842



2275 Upper Middle Road East, Suite 300, Oakville, Ontario, Canada, L6H 0C3 www.baffinland.com

From: Assol Kubeisinova [mailto:assol.kubeisinova@nwb-oen.ca]

Sent: September 7, 2018 3:47 PM

To: Christopher Murray <christopher.murray@baffinland.com>

Cc: Licensing Department < licensing@nwb-oen.ca>

Subject: [EXTERNAL] Re: Mary River Project - Modification No. 10 - Mine Site Upgrades - Email 1 of 2

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Good afternoon Chris,

Thank you for your submission. Please find the following comments to the documentation provided:

1. NWB has no record of receiving a 2018 Work Plan Addendum on June 28, 2018.

The 2018 Work Plan Addendum dated 28 June 2018 and associated reclamation security estimate was provided to the QIA for the purpose of preparing the Joint Submission. The Joint Submission was provided to the NWB on 20 July 2018, and at that time Baffinland indicated the Work Plan and Security documents were available upon request. I have attached the 2018 Work Plan Addendum for your reference, please let me know if you have any questions or require any clarification.

2. Could you please confirm if the request for landfill expansion involves constructing only cell 2 or cells 2-5?

The modification is for entirety of the landfill expansion, however Cell 2 will be constructed first with the remainder constructed sequentially. Issued for Construction (IFC) drawings for Cell 2 have been provided as part of this submission as it is the first to be constructed, currently schedule to begin 60 days following submission. IFCs for the remaining cells will be provided to the NWB 60 days in advance of their construction.

3. In respect of both entries in Table 2 of your submission under the "Theme" entitled "Freshwater Aquatic Environment", please note the Licence condition set out in Part D, Item 25: "The Licensee shall prevent the deposition of debris or sediment from entering into or onto any Water body, with respect to the construction of access roads, site laydown pads and areas or other earthworks. These materials shall be disposed of at a distance of at least thirty-one (31) metres from the ordinary High Water Mark in such a manner that they do not enter the Water."

Baffinland acknowledges the condition of the licence. Table 2 demonstrates the potential for effects related to the change in scope, as assessed within the FEIS. While minor potential for increased sedimentation effects are associated with the activity, Baffinland will employ appropriate mitigation measures as outlined in the applicable Management Plans to ensure the conditions of the licence are met.

4. In respect of section 3.1.4 of your submission, please provide the information required as per Part G, Item 3(d). In addition, please add the BAF-PH1-320-T07-0004 "Landfill Maintenance and Operation Manual" to the list of the documents to be updated.

With respect to 3.1.4 and Part G, Item 3(d), it is not clear what additional information the NWB is requesting as this section of the submission adequately addresses Part D, Item 3(d). As indicated, there will be no changes to the monitoring locations, currently completed at locations MS-MRY-13A and MS-MRY-13B, for the parameters and frequencies specified in the licence under Table 14 which will not change.

Regarding BAF-PH1-320-T07-004 Landfill Maintenance and Operation Manual, there are no updates required to this document as a result of the landfill expansion, as the management and operational guidance contained within is not specific to the current cell or design, nor does it define extents or boundaries of the landfill to which it applies.

5. The "Fresh Water Supply, Sewage, and Wastewater Management Plan" states the following about the effluent from the Weatherhaven sewage treatment plant: "Once sampling indicates that effluent is meeting discharge criteria the treated effluent stream is directed to discharge via pipeline to the Mary River discharge locations". It contradicts the statement made in BIMC's submission ("Treated sewage effluent from the camp's dedicated sewage treatment plant is currently transported by truck to the approved discharge location near Mary River"). Could you please clarify the reason for the difference in these statements?

The Camp referred to in Modification No. 10 submission is the 800 person camp, not the Weatherhaven facility. The current water treatment plant on Site which handles influent from the Weatherhaven camp and the Mine Site Complex discharges effluent via pipeline to Mary River, consistent with the management plan. The water treatment plant for the 800 person camp currently transports the treated effluent to the final discharge point via truck, however the installation of the discharge line will improve efficiency and reduce operational risk.

6. Is there a construction summary report filed for Modification 4?

Not currently, as the construction of the 800-person camp is on-going. Once construction is completed the construction summary report including as-built documentation will be filed within 90 days. Construction is currently projected to be complete at the end of the year.

Regards,



Assol Kubeisinova- ついてはいるはい

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NUNAVUT WATER BOARD - OFFICE DES EAUX DU NUNAVUT ΔαΦ° ΔL⊂αΑ° b∩LΑΝΡ- NUNAVUT IMALIRIYIN KATIMAYINGI

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On Wed, Sep 5, 2018 at 2:34 PM Christopher Murray <christopher.murray@baffinland.com> wrote:</christopher.murray@baffinland.com>
EMAIL 1 of 2
Hello Assol,
Baffinland Iron Mines Corporation (Baffinland) presents the attached Modification No. 10 under Part G of the Type 'A' Water Licence 2AM-MRY1325, for upgrades at the Mine Site of the Mary River Project. In keeping with the requirements of the Nunavut Impact Review Board (NIRB), the attached Modification incorporates a self-assessment.
Please find attached Part 1 of 2 due to email size restrictions, the remaining part of the Modification will follow in a subsequent email.
Please let me know should you have any questions or concerns.
Kind Regards,
Christopher Murray Environmental & Regulatory Compliance Manager

Oakville - 2275

T: +1 416 364 8820 x5072 C: +1 647 472 9842

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