



NWB Tools

Ida Porter &lt;ida.porter@nwb-oen.ca&gt;

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## Mary River Project - Modification No. 3b Responses - 2AM-MRY1325

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**Christopher Murray** <christopher.murray@baffinland.com>

Wed, Jan 16, 2019 at 9:22 AM

To: Assol Kubeisinova &lt;assol.kubeisinova@nwb-oen.ca&gt;

Cc: Licensing Department &lt;licensing@nwb-oen.ca&gt;

Hello Assol,

I have followed up with the engineering team to discuss the drawings for the sewage treatment system for the 380 person camp. As the unit that is to be installed arrived at Site in 2017, and is pre-fabricated and was purchased used, the manufacturer will not sign the drawings nor will any of our supporting engineering contractors until the unit is installed. Our project engineering team at Hatch advised that the only drawings they would be able to produce and sign/stamp would be as-built documentation, confirming the final arrangement and layout of the equipment once it is installed. Based on the below communication from QIA, this would alleviate their concern on this matter. As the QIA would be satisfied with this approach, and CIRNAC has no further concerns as indicated in their communication, Baffinland believes this is an appropriate path forward.

I would ask that the board consider the drawings that were submitted to be ancillary supporting documentation for the process guarantee, provided to give reviewers an understanding of the general arrangement. These drawings were not intended to be engineering drawings, and are not marked 'Issued for Construction'. Furthermore, there is no precedent for Baffinland to provide signed and sealed drawings of prefabricated equipment that contain water or waste for a modification. Baffinland asks the board use discretion in interpreting the conditions of the Type 'A' Water Licence, as the supply of signed drawings for the treatment plant will not add any additional assurance that it is designed appropriately over and above what Banner Environmental has certified.

Baffinland believes there is sufficient information and feedback from all parties at this time to proceed with approval of Modification No. 3b, and asks that the NWB give consideration to the above. Should there be any outstanding comments or concerns please let me know.

Thank you,

**Christopher Murray | Environmental & Regulatory Compliance Manager**

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

**Sent:** January 11, 2019 3:18 PM

**To:** Christopher Murray <[christopher.murray@baffinland.com](mailto:christopher.murray@baffinland.com)>

**Cc:** Licensing Department <[licensing@nwb-oen.ca](mailto:licensing@nwb-oen.ca)>

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