

26 June 2018

Assol Kubeisinova  
Technical Advisor  
Nunavut Water Board  
P.O. Box 119  
Gjoa Haven, NU, X0B 1J0

**RE: Modification Request No. 8 – Waste Rock Facility Sedimentation Pond  
Mary River Project, Water Licence 2AM-MRY1325 - Amendment No. 1**

**1 – INTRODUCTION**

Baffinland Iron Mines Corporation (Baffinland) is pleased to submit this request for approval for modification to the Mary River Project (the Project), in accordance with Part G of Type A Water Licence 2AM-MRY1325 - Amendment No. 1 (Type A Water Licence). As part of this modification request, consistent with guidance from the Nunavut Impact Review Board (NIRB), Baffinland has completed a self-assessment to demonstrate that the change proposed does not constitute a significant modification to the Project as originally approved under Project Certificate No. 005 (as Amended) and that the potential ecosystemic and socio-economic effects associated with the modification are insignificant.

On January 10, 2018, Baffinland submitted Rev. 1 of its 2018 Work Plan to the Nunavut Water Board (NWB) and the Qikiqtani Inuit Association (QIA) (Baffinland 2018a). The Work Plan included scope of work items that are considered approved under the Project Certificate, but require a Type “A” Water Licence modification (Category 2). On 8 March 2018, Baffinland submitted a Modification Request to the NWB for select Category 2 items to be advanced in 2018 (Baffinland 2018b). This Modification Request No. 8 is for additional activities related to 2018 Work Plan Item No. 5:

- **Mine Site Waste Rock Facility (WRF) Sedimentation Pond Expansion (2018 Work Plan Item No. 5)** –The expansion is required based on the expanded footprint of the WRF in 2018, required to better manage placement of potentially acid generating (PAG) material within the WRF. This modification is for the expansion of this footprint, the associated berms and ditching and the expansion of the WRF pond.

The above item is shown on Figure 1 (Mine Site) presented as Attachment 1.

**2 – SELF-ASSESSMENT OF PROPOSED MODIFICATION**

Baffinland has undertaken a self-assessment of the proposed modification in accordance with the *Process for Seeking Approval for Modifications to Previously-Approved Projects* (NIRB 2018). This self-assessment consists of four main components:

- Comparison of the modification with the scope of the Approved Project
- An assessment of significance applying the factors set out in Section 90 of the Nunavut Project Planning and Assessment Act (NuPPAA)

- Identification of other new or modified permits, licences or approvals necessary to complete the proposed modification
- Determination as to whether or not reconsideration of the existing Project Certificate is appropriate, considering Nunavut Agreement Section 12.8.2 and NuPPAA Section 112.

## 2.1 COMPARISON OF MODIFICATION TO APPROVED PROJECT

Baffinland undertook a comparison of the proposed modification with the scope of the Approved Project, as described in the Final Environmental Impact Statement (FEIS) and the FEIS Addendum (Baffinland 2012 and 2013) for the Early Revenue Phase (ERP) of the Project. In completing this review, Baffinland considered the following question:

*Was the modification activity assessed previously, or does it represent a reasonably expected modification or optimization of that which was assessed in the FEIS or FEIS Addendum?*

This modification request has been assessed previously, and is an optimization consistent with previously assessed activity. The results of this review are presented in Table 1.

**Table 1 Comparison of Proposed Modification to the Scope of the Approved Project**

| Item No. | Activity/Infrastructure                           | Comparison to the Scope of the Approved Project                                                                                                                                                                                                                                                                                                                                                                                                | FEIS Reference            |
|----------|---------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------|
| 5        | Mine Site Waste Rock Sedimentation Pond Expansion | The proposed WRF Pond expansion involves the raising of the berm and expanding the footprint to increase the holding capacity of the pond. Related work includes construction of a new emergency spillway, two perimeter diversion ditches with riprap erosion protection, and a culvert crossing for a road to access the water treatment system pad. These are consistent with the scope of the Approved Project and its assessment by NIRB. | FEIS Vol 3, Section 3.4.5 |

## 2.2 SIGNIFICANCE ASSESSMENT

A screening level assessment of potential changes to the assessment of the Approved Project effects was completed for each of the valued ecosystem components (VECs) and valued socio-economic components (VSECs) identified in the FEIS. This assessment is presented in Table 2.

**Table 2**

**Comparison of Effects of Requested Modification to Approved Project**

| Theme                          | FEIS VEC                                              | FEIS Key Indicator                                                                             | Change in Effect and Significance | Description of Change in Potential Effects                                                                                                                                                                                                               | Additional Mitigation Measures                                                                                                                                                                                                                                                            |
|--------------------------------|-------------------------------------------------------|------------------------------------------------------------------------------------------------|-----------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Atmospheric Environment        | Climate change                                        | Greenhouse gases (GHGs)                                                                        | Change; not significant           | One-time minor increase in annual GHG emissions of ERP that is immeasurable in the context of the Life-of-Mine (LOM) GHG estimate of the Approved Project.                                                                                               | No additional mitigation required                                                                                                                                                                                                                                                         |
|                                |                                                       | Climate change                                                                                 | Change; not significant           | Immeasurable minor increase.                                                                                                                                                                                                                             | No additional mitigation required                                                                                                                                                                                                                                                         |
|                                | Air quality                                           | Particulate matter, SO <sub>2</sub> , NO <sub>x</sub>                                          | Change; not significant           | Site characteristics and effects pathways are unchanged. Short-term localized increases in particulate matter and gaseous emissions associated with additional earthworks, entirely mitigated once modification is complete.                             | No additional mitigation required; implement existing Air Quality and Noise Abatement Management Plan.                                                                                                                                                                                    |
|                                |                                                       | Noise and vibration                                                                            | Change; not significant           | Short-term localized noise increase associated with additional earthworks, entirely mitigated once modification is complete.                                                                                                                             | No additional mitigation required; implement existing Air Quality and Noise Abatement Management Plan.                                                                                                                                                                                    |
| Terrestrial Environment        | Landforms, soil and permafrost                        | Sensitive landforms                                                                            | No change                         | There are no sensitive landforms identified within the existing PDA where the modification will be undertaken.                                                                                                                                           | No additional mitigation required; implement existing Environmental Protection Plan (EPP).                                                                                                                                                                                                |
|                                | Vegetation                                            | Plant abundance and diversity<br>Plants important to Inuit<br>Plant health                     | No change                         | Assessment of the Approved Project assumed complete loss of vegetation within the PDAs. Since modification will occur within the existing PDA, no change to vegetation will occur relative to the Approved Project.                                      | No additional mitigation required; implement existing EPP.                                                                                                                                                                                                                                |
|                                | Terrestrial wildlife and habitat                      | Caribou                                                                                        | No change                         | Assessment of the Approved Project assumed complete loss of terrestrial habitat within the PDA. Since modification will occur within the existing PDA, no change to terrestrial wildlife habitat will occur relative to the Approved Project.            | No additional mitigation required; implement existing Terrestrial Environment Mitigation and Monitoring Plan (TEMMP).                                                                                                                                                                     |
|                                | Migratory birds and habitat                           | Peregrine Falcon, Snow Goose, Eider, Red-throated Loon, shorebirds, songbirds, species at risk | No change                         | Assessment of the Approved Project assumed complete loss of habitat within the PDA. The footprint of the modification will be surveyed for bird nests prior to work if being undertaken during the nesting season, in accordance with the TEMMP and EPP. | No additional mitigation required; implement existing TEMMP and EPP.                                                                                                                                                                                                                      |
| Freshwater Aquatic Environment | Surface water include freshwater quality and quantity | Water quantity<br>Water and sediment quality                                                   | Change; not significant           | Additional earthworks represent a minor potential increase in sedimentation effects to local watercourses. No major diversions are proposed that will result in material impacts to water quantity.                                                      | No additional mitigation required; water management measures will be installed consistent with Baffinland's Civil Design Criteria and with applicable management plans: Surface Water and Aquatic Ecosystems Management Plan, Freshwater, Sewage and Wastewater Management Plan, and EPP. |

| Theme              | FEIS VEC                                                                                                                                                                                                                                                                                                                                                                                                         | FEIS Key Indicator                                                | Change in Effect and Significance | Description of Change in Potential Effects                                                                                                                                                                                | Additional Mitigation Measures                                                                                                                                                                                    |
|--------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------|-----------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                    | Freshwater fish, fish habitat and other aquatic organisms                                                                                                                                                                                                                                                                                                                                                        | Arctic char                                                       | Change; not significant           | The proposed modification is not situated within or immediately upstream of fish habitat. The potential for changes to water quality affecting fish is unlikely to result from potential sedimentation during earthworks. | No additional mitigation required; implement existing Surface Water and Aquatic Ecosystems Management Plan, Freshwater, Sewage and Wastewater Management Plan, and EPP, updated with 2018 work plan as necessary. |
| Marine Environment | Sea ice                                                                                                                                                                                                                                                                                                                                                                                                          | Area of shore fast ice in Steensby Inlet                          | No change                         | Not applicable to the requested modification.                                                                                                                                                                             | No additional mitigation required.                                                                                                                                                                                |
|                    | Water and sediment quality                                                                                                                                                                                                                                                                                                                                                                                       | Water and sediment quality parameters with established guidelines | No change                         | Not applicable to the requested modification.                                                                                                                                                                             | No additional mitigation required.                                                                                                                                                                                |
| Human Environment  | Land and resources use                                                                                                                                                                                                                                                                                                                                                                                           | Wildlife harvesting by Inuit<br>Travel and camps                  | No change                         | The scale of the modification is minor and entirely confined to the existing PDA and Commercial Lease boundaries. Changes to how Baffinland manages visitors and hunters will not be necessary.                           | No additional mitigation required.                                                                                                                                                                                |
|                    | Cultural resources                                                                                                                                                                                                                                                                                                                                                                                               | Archaeological sites                                              | No change                         | Effects to archaeology are not expected, as modification is located in an area previously surveyed (and mitigated, if necessary).                                                                                         | No additional mitigation required; implement existing Cultural Heritage Protection Plan and EPP.                                                                                                                  |
|                    | Other Valued Socio-economic Components (VSECs):                                                                                                                                                                                                                                                                                                                                                                  |                                                                   | No change                         | Any additional employment and contracting will be undertaken in accordance with the provisions of the Inuit Impact and Benefit Agreement (IIBA) with the Qikiqtani Inuit Association (QIA).                               | No additional mitigation required.                                                                                                                                                                                |
|                    | <ul style="list-style-type: none"> <li>Population demographics</li> <li>Education and training</li> <li>Human health and wellbeing</li> <li>Community infrastructure and public services</li> <li>Governance and leadership</li> <li>Livelihood and employment</li> <li>Economic development and self-reliance</li> <li>Contracting and business opportunities</li> <li>Benefits, taxes and royalties</li> </ul> |                                                                   |                                   |                                                                                                                                                                                                                           |                                                                                                                                                                                                                   |

The modification request was evaluated against the significance criteria presented in Section 90 of the *Nunavut Project Planning and Assessment Act (NuPPAA)*:

- (a) The size of the geographic area, including the size of wildlife habitats, likely to be affected by the impacts
- (b) The ecosystemic sensitivity of that area
- (c) The historical, cultural and archaeological significance of that area
- (d) The size of the human and animal populations likely to be affected by the impacts
- (e) The nature, magnitude and complexity of the impacts
- (f) The probability of the impacts occurring
- (g) The frequency and duration of the impacts
- (h) The reversibility or irreversibility of the impacts

An assessment of the requested modification in relation to Section 90 of the *NuPPAA* is presented in Table 3.

**Table 3 Significant Modification Self-Assessment Using *NuPPAA* S.90 Significance Criteria**

| <i>NuPPAA</i> Section 90 Significance Criteria                                                                                                                                                       | Evaluation of Modification Request No. 8                                                                                                                                                                                                                                                      |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| (a) the size of the geographic area, including the size of wildlife habitats, likely to be affected by the impacts                                                                                   | Proposed modification is located within the Commercial Lease Boundaries; the geographic extent of the Project remains unchanged.                                                                                                                                                              |
| (b) the ecosystemic sensitivity of that area                                                                                                                                                         | Proposed modification confined to the existing project boundaries; no new environmental sensitivities have been identified.                                                                                                                                                                   |
| (c) the historical, cultural and archaeological significance of that area                                                                                                                            | Proposed modification confined to the existing project boundaries; no new features of historical, cultural or archaeological significance will be affected.                                                                                                                                   |
| (d) the size of the human and the animal populations likely to be affected by the impacts                                                                                                            | No change.                                                                                                                                                                                                                                                                                    |
| (e) the nature, magnitude and complexity of the impacts                                                                                                                                              | Proposed modification has effects that are consistent with the Approved Project.                                                                                                                                                                                                              |
| (f) the probability of the impacts occurring                                                                                                                                                         | Proposed modification has effects that are consistent with the Approved Project.                                                                                                                                                                                                              |
| (g) the frequency and duration of the impacts                                                                                                                                                        | Proposed modification has effects that are similar in frequency and duration to effects assessed for the Approved Project.                                                                                                                                                                    |
| (h) the reversibility or irreversibility of the impacts                                                                                                                                              | The proposed modification has effects that range from fully reversible to irreversible, consistent with the Approved Project.                                                                                                                                                                 |
| (i) the cumulative impacts that could result from the impacts of the project combined with those of any other project that has been carried out, is being carried out or is likely to be carried out | Marginal potential increases in the effects to air quality, noise, water quality and consequently fish and fish habitat are confined to the local study areas, and do not overlap with other past, present or reasonably foreseeable activities that would constitute new cumulative effects. |
| (j) any other factor that the Board considers relevant to the assessment of the significance of impacts                                                                                              | This criterion is not applicable to a proponent self-assessment.                                                                                                                                                                                                                              |

The activities are confined within the boundaries of Baffinland's Commercial Lease and the PDA, and therefore do not represent a change to the previously assessed geographic extent of the Project. These activities will not be located in an area of particular ecosystem sensitivity and the areas of disturbance do not impact areas of historical, cultural or archeological significance. Human and wildlife are not likely to be adversely affected. The activities will not significantly change air emissions, impede water flow, impact aquatic life, hinder wildlife access or increase noise levels, and the activities will not directly interact with fish or fish habitat. Most of the effects are reversible as reclamation will be carried out once the activity is complete. Additional cumulative effects are not expected given that there are no new residual effects predicted from the requested modification.

## 2.3 OTHER REQUIRED APPROVALS

In addition to requiring NWB approval as a modification under the Type A Water Licence, the proposed modification requires approval from the QIA as land owner, as part of the annual work plan approval process. The requested modification will also be incorporated into the Interim Closure and Reclamation Plan, for which updates are currently being completed in concert with QIA.

## 2.4 RECONSIDERATION OF THE PROJECT CERTIFICATE

Baffinland reviewed Section 12.8.2 of the Nunavut Agreement and Section 112 of the *NuPPAA* and has determined that reconsideration of the existing Project Certificate is not appropriate.

Section 112 of *NuPPAA* states the following:

**112 (1)** *The Board may, on its own initiative or at the request of the Designated Inuit Organization, the proponent or any interested person, reconsider the terms and conditions set out in a project certificate that it has issued if*

*(a) the terms and conditions are not achieving their intended purpose or are having effects that are significantly different from those anticipated at the time the certificate was issued;*

*(b) the circumstances relating to the project are significantly different from those anticipated at the time the certificate was issued; or*

*(c) technological developments or new information provides a more efficient method of achieving the intended purpose of the terms and conditions.*

Section 12.8.2 of the *Nunavut Agreement* presents nearly identical wording as *NuPPAA* Section 112.

The requested modification is consistent with the scope of the Approved Project, and hence Baffinland has concluded that the terms and conditions of the Project Certificate are achieving their purpose (Clause a); and that the circumstances related to the project and its effects remain unchanged from the Approved Project (Clause b). No technological developments or new information have been identified in relation to Clause c. The requested modification does not warrant changes to existing conditions or new conditions within the Project Certificate. As such, reconsideration of the Project Certificate is not appropriate.

The requested modification is described in Section 3, in accordance with Part G, Item 3 of the Type A Water Licence.

## 2.5 SELF-ASSESSMENT CONCLUSION

Based on the self-assessment provided in Sections 2.1 through Section 2.4, Baffinland has concluded that:

- The proposed modification is an activity that was previously assessed by Baffinland.
- The effects of the proposed modification is not significant.
- No other permits, licences or approvals (or modifications of existing approvals) are required, beyond approval of this modification request by the NWB, and approval from QIA with respect to the Interim Closure and Reclamation Plan and the associated Reclamation Security. It is expected that upon approval of the current modification request, approval by the QIA, as the land owner, will be granted.
- Reconsideration of the terms and conditions in Project Certificate No. 005 is not required.

### 3 – MODIFICATION REQUEST

In accordance with Part G of Baffinland's Type A Water Licence, the Licensee may carry out modifications after written notification has been provided to the Board, provided such modifications do not place the Licensee in contravention of the Licence or the *Nunavut Waters and Nunavut Surface Rights Tribunal Act*, and such modifications are consistent with the NIRB Project Certificate.

In Section 2, Baffinland confirmed that the requested modification is consistent with the scope of the Approved Project, and that a reconsideration of the Project Certificate is not appropriate.

Baffinland has also reviewed the proposed modification to determine if it potentially contravenes the Water Licence, thereby requiring written approval from the NWB before proceeding.

The Waste Rock Facility sedimentation pond is currently identified in the Water Licence issued by the NWB (identified as MS-08). This modification does not contravene the Licence. Baffinland will proceed with these works 60 days following submission of this modification request. Should the Board respond in writing before the 60 days that approval is not granted for specific works, Baffinland would not proceed with the works until written approval is granted.

#### 3.1 MINE SITE WASTE ROCK FACILITY SEDIMENTATION POND EXPANSION (2018 WORK PLAN ITEM NO. 5)

##### 3.1.1 Description of Facilities and/or Works to be Constructed

Expansion of the existing WRF Pond is a result of the need to expand the footprint of the WRF in 2018, to accommodate new waste management practices associated with the placement of PAG. The expansion involves the raising of the berm and expansion of the footprint to increase the holding capacity of the pond. Related work includes construction of a new emergency spillway, two perimeter diversion ditches with riprap erosion protection, and a culvert crossing for a road to access the water treatment system pad.

##### 3.1.2 Proposed Location of the Structure

The WRF sedimentation pond expansion will occur within the existing PDA, as shown on Figure 1 (Attachment 1).

##### 3.1.3 Identification of any Potential Impacts to the Receiving Environment

This is a facility consistent with the Approved Project and the potential impacts of the activity have been assessed in the FEIS (Table 1). Baffinland will employ a combination of sediment and erosion control measures to address sedimentation concerns, as outlined in Baffinland's Surface Water and Aquatic Ecosystems Management Plan (BAF-PH1-830-P16-0026).

The proposed WRF pond expansion and associated activities will permit the containment of a higher volume of water associated with a higher EDF for the WRF pond, and therefore reduce the potential for accidental release of untreated contact water in the event of a 1 in 10 year storm. This should lead to an overall improvement in the water quality of site runoff, in conjunction with the water treatment plant which is built and currently operational.

#### 3.1.4 Monitoring

Periodic environmental inspections will be conducted by Baffinland's Environmental personnel in conjunction with the Contractor's Health, Safety and Environment Lead. Inspections will ensure that Contractors are complying with the conditions of the Type A Water Licence (in particular Part D, Conditions Applying to Construction and Operation) and Baffinland's management plans and procedures. Inspections will be documented by taking photos and using Baffinland's environmental inspection forms. This includes inspections and photos before and after the work, and during the course of the work to document any deficiencies. Documented deficiencies will be forwarded to the responsible Contractor for corrective action.

Baffinland will prepare a Construction Summary Report for the modification described in this request, in accordance with Part D, Item 17 of the Type A Water Licence. The Construction Summary Report will include the information specified in Schedule D of the licence.

Baffinland will conduct daily water quality monitoring of surface water drainage down-gradient from the construction area. Water quality impacts on nearby water bodies as a result of construction activities will be assessed using established Surveillance Network Program (SNP) monitoring locations and water quality discharge criteria established under Baffinland's Type 'A' Water Licence 2AM-MRY1325. During operation, monitoring of the final (treated) effluent quality at MS-08 will be carried out in accordance with the Type A Water Licence.

#### 3.1.5 Schedule for Construction

Construction is expected to begin 60 days following submission of this modification request in accordance with Part G Item 1 of the Type A Water Licence, or upon written approval from the Board in accordance with Part G Item 2. The work is expected to be completed before the end of 2018, and would proceed approximately as follows:

- Initiation of construction earthworks (60 days from submission, approximately September 1)
- Raise and extend pond berms, complete perimeter trenching (2 weeks)
- Lay geotextile for pond berm raise and trenches (2 days)
- Extend and weld new liner to key into new and existing perimeter trenches (2 weeks)
- Cap liner and confirm key in of berms and ditching (2 days)

Note that the above schedule is provided for reference only, and is subject to change based on weather conditions, material and contractor availability, equipment availability, and any other unforeseen circumstances.

#### 3.1.6 Drawings of Engineered Structures

The following engineering documents in the attached Golder design brief (2018; Attachment 2) provide details on the WRF Pond expansion:

- WRF Pond Expansion – General Arrangement (Drawing No. G-200 Rev A)
- WRF Pond Expansion – Plan & Profile (Drawing No. C-100 Rev A)
- WRF Pond Expansion – Sections and Details (Drawing No. C-120 Rev A)
- WRF Pond Expansion – Sections and Details (Drawing No. C-130 Rev A)
- WRF Pond Expansion – Spillway – Plan, Profile & Sections (Drawing No. C-200 Rev A)



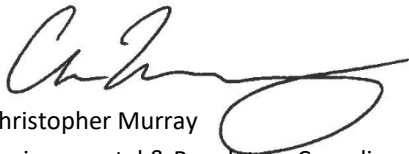
### 3.1.7 Proposed Sediment and Erosion Control Measures

Baffinland will employ a combination of sediment and erosion control measures (check dams, rip-rap, silt fences, etc.), as outlined in the Environmental Protection Plan (Baffinland 2016a) and Surface Water and Aquatic Ecosystems Management Plan (Baffinland 2016b) to address and manage sedimentation concerns during construction. Regular maintenance of the WRF Pond features will be required to ensure they continue to function as intended.

## 4 – CLOSURE

We trust that this information meets the requirements under Part G of Baffinland's Type A Water Licence and look forward to the NWB's response. Please do not hesitate to contact the undersigned should you have any questions or comments.

Regards,



Christopher Murray  
Environmental & Regulatory Compliance Manager

Cc:

David Hohnstein, (Nunavut Water Board)

Fai Ndofo (Qikiqtani Inuit Association)

Jonathan Mesher, Ian Parsons, Karen Costello (Indigenous and Northern Affairs Canada)

Solomon Amuno (Nunavut Impact Review Board)

Grant Goddard, Megan-Lord Hoyle, Timothy Ray Sewell (Baffinland)

## ATTACHMENTS

- 1 Site Layout
- 2 Civil Design Report

**REFERENCES:**

- Baffinland Iron Mines Corporation (Baffinland). 2012. *Mary River Project - Final Environmental Impact Statement*. February.
- Baffinland Iron Mines Corporation (Baffinland). 2013. *Mary River Project - Addendum to the Final Environmental Impact Statement for the Early Revenue Phase*. June.
- Baffinland Iron Mines Corporation (Baffinland). 2016a. *Environmental Protection Plan*. Doc. No. BAF-PH1-830-P16-0008, Rev. 1, August 30, 2016.
- Baffinland Iron Mines Corporation (Baffinland). 2016b. *Surface Water and Aquatic Ecosystems Management Plan*. Doc. No. BAF-PH1-830-P16-0026, Rev.4, March 17, 2016.
- Baffinland Iron Mines Corporation (Baffinland). 2018a. *2018 Work Plan*. Rev. 1 dated January 10, 2018.
- Baffinland Iron Mines Corporation (Baffinland). 2018b. *Mary River Project - Modification Request No. 7 – 2018 Upgrades at the Mine Site and Milne Port (Water Licence 2AM-MRY1325 - Amendment No. 1)*. Letter to the Nunavut Water Board dated March 8, 2018.
- Golder Associates Ltd. 2018. *WRF Pond Expansion Drainage System*. Ref. No. 1790951 (DOC028\_Rev. 0), June 15, 2018.
- Nunavut Impact Review Board (NIRB). 2018. *Process for Seeking Approval for Modifications to Previously-Approved Projects*. Memorandum dated February 14, 2018 issued to the Nunavut Wide Distribution List.

**Attachment 1**

**Site Layout**



