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July 16, 2018

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

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

Dear Assol Kubeisinova,

This letter presents the Qikiqtani Inuit Association's (QIA) response to the Nunavut Water Board's (NWB) request<sup>1</sup> for interested parties to provide comments regarding Baffinland Iron Mines Corporation's (Baffinland) Modification Request No. 8 – Waste Rock Facility Sedimentation Pond (WRF Pond) submitted by Baffinland on June 26, 2018<sup>2</sup>. The NWB requested that comments be submitted by July 16, 2018.

As the Designated Inuit Organization for the Qikiqtani region, QIA and Baffinland signed the Commercial Lease No. Q13C301<sup>3</sup> (the Lease) for the Mary River mine in 2013. QIA's requests presented in **Table 1** herein are focused on items as they relate to the Lease. In addition, the requests are on concerns and uncertainties how Modification No. 8 will mitigate environmental risks identified by the WRF Pond issues that culminated in non-compliant discharges<sup>4</sup>, on Inuit Owned Land less than a year ago.

QIA is happy 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

<sup>1</sup> NWB (2018). Email titled 180627 2AM-MRY1325 Distribution Review & Comment Request Modification Request No. 8 Waste Rock Facility Pond Qikiqtani Region-OAAE. Sent by Ida Porter on June 27, 2018.

<sup>2</sup> Baffinland (2018). RE: Mary River Project – Mine Site Crusher Pad Expansion Modification Request No. 1 Water Licence 2AM-MRY1325. May 29, 2018.

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

<sup>4</sup> INAC (2017) 170509 Inspector's Direction 2AM-MRY1325. September 5, 2017.



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ID	QIA Request
	stamped by a Professional Engineer. The results of said QA/QC monitoring and installation data are to be provided in the construction summary report.
10	Baffinland to provide volume balance to demonstrate that the WRF Pond has sufficient storage capacity and contingency volume.
11	Baffinland to provide the "Design Criteria for 2018 to 2019 Waste Rock Management Pile" <sup>7</sup> and "A hydrological Study to Support Pond Design Calculations at the Mary River Mine, Baffin Island, Nunavut" <sup>8</sup> Golder reports from 2018.
12	Baffinland to explain how the Mary River climate station data recommendation will be used to verify the rainfall intensity-duration-frequency statistics in relevant management and monitoring plans.

<sup>7</sup> Golder (2018). Design Criteria for 2018 to 2019 Waste Rock Management Pile, Mary River Project. DOC025\_Rev A. April 13, 2018.

<sup>8</sup> Golder (2018). A hydrological Study to Support Pond Design Calculations at the Mary River Mine, Baffin Island, Nunavut Doc015-1665556-Rev0. February 6, 2018.