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July 31, 2018

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トートレム% Sanikiluaq Assol Kubeisinova Technical Advisor, Nunavut Water Board P.O. Box 119 Gjoa Haven, Nunavut, X0B 1J0

Re: Mary River Project – Milne Port Ore Stockpile Water Management Upgrades Modification Request No. 9. Water Licence 2AM-MRY1325

Dear Assol Kubeisinova,

This letter presents the Qikiqtani Inuit Association's (QIA) response to the Nunavut Water Board's (NWB) request¹ for interested parties to provide comments regarding Baffinland Iron Mines Corporation's (Baffinland) Modification Request No. 9 Milne Port Ore Stockpile Water Management Upgrades submitted by Baffinland on July 16, 2018.² The NWB requested that comments be submitted by July 31, 2018 at 5:00 pm Mountain Standard Time.

As the Designated Inuit Organization for the Qikiqtani region, QIA and Baffinland signed the Commercial Lease No. Q13C301³ (the Lease) for the Mary River mine in 2013. QIA's requests as presented in **Table 1** herein are focused on items as they relate to the Lease.

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

¹ NWB (2018). Email titled: 180717 2AM-MRY1325 Distribution Review & Comment Request (BIMC) Modification Request No. 9 Qikiqtani Region-OLAE. Sent by Ida Porter on July 17, 2018.

² Baffinland (2018). RE: Modification Request No. 9 Milne Port Ore Stockpile Water Management Upgrades Mary River Project, Water Licence 2AM-MRY1325-Amendment No.1. July 16, 2018.

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



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Table 1: QIA requests to NWB concerning Baffinland's modification request.

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ID	QIA Request
1	Baffinland to follow the As Built Operations Guide, further detailing expectations of Article 6.4 item c) of the Lease when preparing the As Built Report/Construction Summary Reports for the Settling Ponds. The As Built Report should summarize all considerations in Section 6 of the Civil Design Report prepared by HATCH. This does not limit Baffinland's requirements to Part D, item 17 of the Water Licence.
2	Baffinland to provide the source for construction materials.
3	Baffinland to provide detailed for construction drawings for the two new culvert crossings installed beneath access roads in addition to the existing culvert.
4	Baffinland to provide the borehole log and precise location with respect to proposed facilities for Borehole BH 16-M001.
5	Baffinland to provide the quantities and the physical characteristics of construction materials.
6	Baffinland to provide a slope stability analysis to demonstrate stability of the new compartments.
7	Baffinland to provide an Operations, Maintenance, and Surveillance (OMS) Manual/Plan. The OMS should provide detailed instrumentation and monitoring plans, including but not limited to sampling locations, parameters measured, and frequencies of sampling to be carried out.
8	Baffinland to provide the temporary water management plan described in Section 6.1 of the Civil Design Report fifteen (15) days prior to construction, for review by QIA.
9	Baffinland to provide detailed instrumentation and monitoring plans, including but not limited to sampling locations, parameters measured, and frequencies of sampling to be carried out. This item would be included in the OMS.
10	Baffinland to provide prior to construction, construction QA/QC specifications and geomembrane installation specifications required to ensure the construction is completed according to the design intent and to an acceptable standard. Specifically, the design is missing a quality assurance and quality control for material placements, construction density and water content requirements. Specifications are to be signed and stamped by a Professional Engineer. The results of said QA/QC monitoring and installation data are to be provided in the construction summary report.
11	Baffinland to acknowledge that any water released into the marine environment is a violation under the Fisheries Act.
12	The Civil Design Report prepared by HATCH is to be signed and stamped by a Professional Engineer with a Northwest Territories and Nunavut Associations of Professional Engineers and Geoscientists Permit to Practice.



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ID	QIA Request
13	Baffinland to provide a volume balance to demonstrate the Settling Ponds have sufficient storage capacity and contingency volume.
14	Baffinland to provide the environmental inspection forms and a complete environmental monitoring program for review. Results should be included in the asbuilt construction report.