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NUNAVUT WATER BOARD
NUNAVUT IMALIRIYIN KATIMAYINGI
OFFICE DES EAUX DU NUNAVUT

January 7, 2022

File No: 2AM-MRY1325

By Email

Lou Kamermans
Senior Director, Sustainable Development
Baffinland Iron Mines Corporation
Suite 300 – 2275 Upper Middle Road East
Oakville, Ontario, Canada L6H 0C3

Amanda McKenzie
Project Manager
Stantec
400-1620 Dickson Avenue
Kelowna BC V1Y 9Y2

Email: lou.kamermans@baffinland.com

Email: Amanda.McKenzie@stantec.com

Re: Type “A” Water Licence No: 2AM-MRY1325, Mary River Project - Nunavut Water Board Response to Request for Modification of Monitoring Program by Baffinland Iron Mines Corporation

Dear Lou Kamermans and Amanda McKenzie:

This letter is a response to the correspondence (Request) provided by Baffinland Iron Mines Corporation (Baffinland or Licensee) to the Nunavut Water Board (NWB or Board) on March 31, 2021 proposing that the Board modify the identifications of Monitoring Stations in Table 13 Monitoring Program: Milne Port Site and Table 14 Monitoring Program: Mary River Mine Site within the *Schedule I. Conditions Applying to General and Aquatics Effects Monitoring* of Water Licence 2AM-MRY1325 (Licence).

The Licensee stated:

Baffinland is proposing to decommission one (1) station and change one (1) station ID Milne Port as well as relocate one (1) station and introduce one (1) new station at Mine Site.

The NWB information relevant to the proposed modifications is available from the Board’s ftp site using the following link:

[ftp://ftp.nwb-oen.ca/registry/2 MINING MILLING/2A/2AM - Mining/2AM-MRY1325 BIMC/3 TECH/1 GENERAL \(B\)/2 ANNUAL RPT/2020/](ftp://ftp.nwb-oen.ca/registry/2%20MINING%20MILLING/2A/2AM%20-%20Mining/2AM-MRY1325%20BIMC/3%20TECH/1%20GENERAL%20(B)/2%20ANNUAL%20RPT/2020/)

The Request was part of the 2020 Annual Report document package. On April 14, 2021, the Request was distributed for public review along with the 2020 Annual Report documents. In its August 9, 2021 review of the 2020 Annual Report, Crown-Indigenous Relations and Northern

Affairs (CIRNA) inquired where water previously reporting to station MP-C-C is now directed and discuss whether the station could be relocated to capture the diverted flow.

On December 13, 2021, the Licensee responded:

The removal of SNP [Surveillance Network Program] station MP-C-C was proposed because the station was no longer capturing surface discharge following construction of laydowns. The water previously reporting to MP-C-C is now contained in the ditch running alongside the Tote Road until it is diverted into the W3/W14 ditch that flows out into the tundra. It is not necessary to relocate this station as the water is eventually captured and sampled at the MP-C-K (formerly MP-C-B) SNP station.

It should be noted that the Board sets out in Part B, Item 16 of the Licence:

If the Board subsequently determines that an item included in a Schedule requires revision in order to better reflect the intent and objectives of the Licence, the Board may at its discretion and upon providing written notice to the Licensee and interested parties, revise the Schedule accordingly. Unless the Board directs otherwise, such revision may not necessarily be construed as an “amendment” to the Licence.

The Board’s opinion is that proposed modification generally meets the requirements of Part G of the Licence, including a sixty (60) days’ advance notice for the modification. On the basis of the Board’s review, the Board accepts that the changes as proposed in Baffinland’s March 31, 2021 letter constitute modifications that are consistent with the existing terms and conditions of the Licence and has approved the Modification through Board Motion No. (2021-A1-009), as required by Part G, Item 2 of Licence.

The Board requires that all relevant management plans be updated to reflect the updated nomenclature for the Monitoring Stations. All updated documents shall be included within the 2021 Annual Report. The Licensee is reminded to adhere to Licence conditions set out in Part I, Items 6, 8, and 10.

The NWB would also like to highlight that any Licence terms and conditions referring to the Monitoring Stations’ should be read with taking into account the enclosed modified Tables 13 and 14.

If you have any questions, please contact the undersigned at assol.kubeisinova@nwb-oen.ca or (867) 360 6338 (ext. 31).

Best regards,



Assol Kubeisinova,
Nunavut Water Board
Technical Advisor

Enclosure: Updated Schedule I, Tables 13 and 14

Cc: Distribution List – Mary River

Schedule I Conditions Applying to General and Aquatics Effects Monitoring**Modified Table 13: Monitoring Program - Milne Port Site**

| Station | Description | Project Phases | Monitoring Parameters | Frequency |
|----------|--|---------------------------------------|-----------------------------|---|
| MP-MRY-2 | Freshwater Intake at Phillips Creek (Summer) | Construction Operations Closure | Group 1 | Record Daily Report Monthly |
| MP-MRY-3 | Freshwater Intake from Km 32 Lake (Winter) | Construction Operations Closure | Group 1 | Record Daily Report Monthly |
| MP-01 | Milne Port Sewage Treatment Facilities (discharge into ditch prior to ocean) | Construction Operations | Groups 1, 2 | Monthly |
| | | | Group 3 | Annually |
| MP-01a | Milne Port Polishing Waste Stabilization Pond (PWSP) | Construction Operations | Groups 1, 2 | Once prior to discharge and Monthly |
| | | | Group 3 | Annually |
| MP-02 | Milne Port Maintenance Shop Oily water/WWTF | Construction Operations | Groups 1 and 4 | Monthly |
| MP-03 | Milne Port Bulk Fuel Storage Facility Stormwater | Construction Operations | Groups 1 and 4 5 | Daily Flow Monthly |
| MP-04 | Milne Port Landfarm Facility Stormwater | Construction Operations Closure | Group 1 Group 5 Plus TSS | Daily Flow Monthly |
| MP-C-A | Surface discharge downstream of construction area at Milne Port | Construction | Groups 1 and 8 | During periods of flow and following significant precipitation events, on a monthly basis |
| MP-C-B | | | | |
| MP-C-D | | | | |
| MP-C-E | | | | |
| MP-C-F | | | | |
| MP-C-H | | | | |
| MP-C-K | | | | |
| MP-C-J | Surface discharge south of Laydown LP3 | Construction Operations | Groups 1 and 8 | During periods of flow and following significant precipitation events, on a monthly basis |

| | | | | |
|----------------|---|----------------------------------|----------------|--------------------------|
| MP-05 (New) | Milne Port Ore Stockpile Sedimentation Pond (East) | Construction Operation ERP | Groups 1 and 7 | Monthly during summer |
| | | Closure Operation | Group 3 | Annually |
| MP-06 (New) | Milne Port Ore Stockpile Settling Pond (West) | Construction ERP | Groups 1 and 7 | Monthly during summer |
| | | Operations Closure | Group 3 | Annually |

Modified Table 14: Monitoring Program - Mary River Mine Site

| Station | Description | Phases | Monitoring Parameters | Frequency |
|------------|--|---------------------------------------|----------------------------|---|
| MS-MRY-1 | Freshwater Intake from Camp Lake | Construction Operations Closure | Group 1 | Record Daily |
| MS-01 | Mine Site Sewage Treatment Facilities | Construction Operations | Groups 1 and 2 | Monthly |
| | | | Group 3 | Annually |
| MS-01a | Mine Site Polishing/Waste Stabilization Pond (PWSP) | Construction Operations | Groups 1 and 2 | Once prior to discharge and Monthly thereafter |
| | | | Group 3 | Annually |
| MS-02 | Mine Site Maintenance Shop Oily Water WWTF | Construction Operations | Groups 1 and 4 | Monthly |
| MS-MRY-04 | Exploration Camp Sewage Treatment Facility | Construction Operations Closure | Groups 1 and 2 | Monthly |
| | | | Group 3 | Annually |
| MS-MRY-04a | Exploration Camp Polishing Waste Stabilization Ponds (PWSP) | Construction Operations | Groups 1 and 2 | Once prior to discharge and monthly hereafter |
| | | | Group 3 | Annually |
| MS-03 | Mine Site Bulk Fuel Storage Facility Stormwater | Construction Operations | Groups 1 and 5 | Daily Flow Monthly |
| MS-03B | Second Mine Site Bulk Fuel Storage Facility Stormwater | Construction Operations | Groups 1 and 5 | Daily Flow Monthly |
| MS-04 | Mine Site Fuel Unloading Station Stormwater | Construction Operations | Groups 1 and 5 | Daily Flow Monthly |
| MS-05 | Mine Site Landfarm Facility Stormwater | Construction Operations | Groups 1 and 5 Plus TSS | Daily Flow Monthly |

| | | | | |
|-------------------------|---|---------------------------------|----------------|---|
| MS-MRY-6 | Exploration Camp Bulk Fuel Storage Facility (Bladder Farm) Stormwater | Construction Operations | Groups 1 and 5 | Daily Flow Monthly |
| MS-06+ | Ore Stockpile Pond Stormwater | Operations Closure | Groups 1 and 7 | Monthly during summer |
| | | | Group 3 | Annually |
| MS-07 | Run of Mine Ore Stockpile Pond Stormwater | Operations Closure | Groups 1 and 7 | Monthly during summer |
| | | | Group 3 | Annually |
| MS-08 | Waste Rock Stockpile West Pond | Operations Closure | Groups 1 and 7 | Monthly during summer |
| | | | Group 3 | Annually |
| MS-09 | Waste Rock Stockpile East Pond | Operations Closure | Groups 1 and 7 | Monthly during summer |
| | | | Group 3 | Annually |
| MS-MRY-09 | Deposit No. 1 surface water drainage (including the Bulk Sample Open Pit) | Construction Operations | Groups 1 and 7 | Monthly (during summer) |
| | | | Group 3 | Annually |
| MS-MRY-10 | Deposit No. 1 downstream surface water drainage | Construction Operations Closure | Groups 1 and 7 | Monthly (during summer) |
| | | | Group 3 | Annually |
| MS-MRY-13a & MS-MRY-13b | Non-Hazardous Waste Landfill – Downstream surface water drainage | Construction Operations Closure | Groups 1 and 6 | Daily Monthly |
| MS-C-A | Surface discharge downstream | Construction | Groups 1 and 8 | During periods of flow and following significant precipitation events, on a monthly basis |
| MS-C-B | | | | |
| MS-C-C | | | | |
| MS-C-D | | | | |
| MS-C-E | | | | |
| MS-C-F | | | | |
| MS-C-G (New) | Surface discharge downstream of construction area at Mine Site | Construction | Group 1 and 8 | During period of flow and following precipitation events on a monthly basis |
| MS-C-H (New) | | | | |