



Environmental Protection Operations
Qimugjuk Building 969 P.O. Box 1870
Iqaluit, NU X0A 0H0
Tel: (867) 975-4639
Fax: (867) 975-4645

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Our File: 4703 001 062
NWB File: 2BB-MEL0709

Richard Dwyer
Nunavut Water Board
P.O. Box 119
Gjoa Haven, NU, X0B 1J0
Tel: (867)360-6338
Fax: (867)360-6369

via e-mail: licensingadmin@nunavutwaterboard.org

RE: NWB 2BE-MEL0709 Comaplex Minerals Corp. - Meliadine Project – Renewal- “Type B” Water Licence

On behalf of Environment Canada (EC), I have reviewed the information submitted with the above-mentioned application. The following specialist advice has been provided pursuant to Environment Canada's mandated responsibilities under the *Canadian Environmental Protection Act*, Section 36(3) of the *Fisheries Act*, the *Migratory Birds Convention Act*, and the *Species at Risk Act*.

Comaplex Minerals Corporation (Comaplex) is applying to renew the Type B water licence for the Meliadine West Gold (Meliadine) Project. Comaplex has completed the bulk sampling program and is currently evaluating the results and potentially moving towards completing a feasibility study. Future work will include continued diamond drilling, geochemical and environmental studies, and monitoring activities.

Upgrades to the waste treatment systems are proposed to occur during the summer of 2009. Comaplex is proposing to replace the existing waste water treatment system with a new wash car, which includes flush toilets, and a Biodisk system. Until the system is operational, the camp will continue to use the wetland treatment for grey water, and use incineration to dispose of sewage. EC commends the proponent for installing the new system, as it is preferred to incinerating sewage. However, EC would like to have more information on the general operation of the proposed Biodisk system. For example, EC would like to know how the proponent plans to handle flow volume fluctuations going into the Biodisk System, and how sludges will be managed. Additionally, if the camp is operational during winter conditions, how does Comaplex plan on managing effluent outflow into a frozen sump? EC would also like to know which Monitoring Station will be considered as the final discharge point to the receiving environment.

Environment Canada is developing a Technical Document for Batch Waste Incinerators. The technical aspects of the document focus on appropriate incineration equipment and best management practices required to achieve the Canada-Wide Standards for dioxins/furans and mercury. A draft copy of the executive summary of the technical document is provided. The board and the proponent are encouraged to contact EC for further information regarding the technical document.

Comaplex has provided a document entitled “*Waste Rock and Ore Storage Management Plan for Materials Generated During the Excavation of the Exploration Decline at the Tiriganiaq Deposit, Meliadine West Project*”, for review. EC commends the proponent on increasing monitoring at all monitoring sites to monthly. However, it should be noted that in the event that there are any changes in water quality, or

higher than expected levels of contaminants are encountered, the water monitoring sampling frequency be revised accordingly.

EC recommends that an updated Abandonment and Reclamation Plan and Spill Contingency Plan be required as a condition of the renewal of the water licence. EC looks forward to reviewing these updated plans when they are made available.

Environment Canada has no issues with the renewal provided the proponent follows mitigation measures outlined in the application, responds to concerns addressed above, and that they are in compliance with their existing water licence. Previous comments and recommendations submitted by EC staff relating to the Meliadine Project would still apply. Terms and conditions applied to the existing water licence should be carried forward to the renewal.

If there are any changes in the proposed project, EC should be notified, as further review may be necessary. Please do not hesitate to contact me with any questions or comments with regards to the foregoing at (867) 975-4631 or by email at carrie.spavor@ec.gc.ca.

Yours truly,

Original signed by

Carrie Spavor
Environmental Assessment Coordinator
Environmental Assessment - North,
Environmental Protection Operations

cc: Carey Ogilvie (Head, EA-North, Environment Canada)
Anne Wilson (Water Pollution Specialist, Environment Canada)