



September 8, 2008
3.393 – GO/02

Honorable Chuck Strahl, P.C., M.P.
Minister of Indian and Northern Development and Federal Interlocutor for Metis and
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Dear Minister Strahl,

On August 15, 2008, Comaplex Minerals Corp. received an email letter dated August 13, 2008 from the INAC Inspector (A. Keim) regarding a site visit to the Meliadine West gold property on August 2, 2008. Comaplex has carefully reviewed the Inspection Report Directive by A. Keim of INAC. It appears that our only recourse to the Directive from this particular INAC Inspector is to address this issue to the Federal Minister as per section 87(3) of the Nunavut Waters Act. By way of background, the Meliadine West Gold Project is situated on Inuit Owned Land near Rankin Inlet, Nunavut. Land use by our exploration program is conducted under the authority of a Commercial Lease (with a \$950,000 Security Deposit) and a Land Use License issued by the Kivalliq Inuit Association.

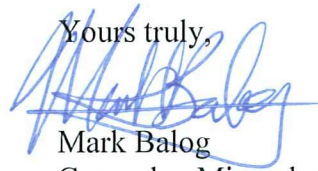
We feel it is very unfortunate and time-consuming for all involved that Comaplex must address this matter at the Federal Ministerial level. Comaplex has worked long and hard to develop a good reputation and a solid performance history as a reasonable and responsible exploration company in Nunavut. We much prefer to work in cooperation

with the various agencies on all matters, but for whatever reason, this has not been possible with this particular INAC Inspector.

Attachment A lists specific responses by Comaplex to the issues raised in the August 13, 2008 letter from the INAC Inspector, A. Keim. The letter itself is also attached.

The tone and implications of the letter from the INAC Inspector was a surprise to us. Comaplex has tried to comply with all reasonable demands of the INAC Inspector. The implied severity of the INAC Inspector's concerns were not mentioned whatsoever during his visit. In fact, the men in camp said the inspection went quite well, so it is a surprise that we are being threatened with fines and imprisonment – especially on several matters that the KIA had no issues with in a visit 2 weeks prior to the INAC Inspector's visit. Requests by Comaplex personnel for a written report at the time of the inspection were met with the statement that the INAC Inspector did not have any forms.

Yours truly,



Mark Balog
Comaplex Minerals Corp.

c.c. B. MacIssac, INAC
Luis Manzo, KIA

Attachment A:

After careful and deliberate consideration, our response to the items as laid out on the last page of the INAC Inspector's Directive (see attached), are itemized in order as follows:

1) Urination: The signs on the toilet stall doors dealing with the urination issue have been removed. All urine products will be burned in the incinerator. The longer term solution, as explained to the INAC Inspector at the time of the inspection, will be a waste water treatment plant which has been ordered and will be installed at the Mel West camp in the winter of 2008-2009. A new wash car (low flush toilets and sinks) has also been purchased and will be barged in and brought into camp for installation as well. This was relayed to the INAC Inspector, but was not mentioned or considered in the INAC Inspector's report.

2) Water Meters: Comaplex's Site Water Management Plan on file with the Nunavut Water Board was approved in a letter dated August 14, 2008. In this letter, references to the INAC comments to our plan are noted and a statement is made that these comments "should be considered". We have considered the request for water meters and our position is as follows:

Water meters installed on the intake of the pipe, as suggested by the INAC Inspector, are not an indicator of actual water usage, due to the flow-through system employed by all exploration companies operating in the north (moving water does not freeze). The suggestion that the meter be put on the end of the pipe, as suggested in the INAC comments to our Site Water Plan, is measuring water we are not using, not water we are using. Comaplex is charged on a per cubic meter basis for water consumption. In either instance, we are not at all inclined to pay for water that we are not using.

The INAC Inspector was provided with detailed accounts of actual water usage for the camp and the Redpath shop. These were provided to the INAC Inspector. With regards to water usage by the drills, we estimate 25 cubic meters per day, which we have found in research is equivalent to, or exceeds what other companies are using as estimates of what is widely accepted. Part B (7) of our current water license for the project states that "... flow meters or other such devices or suitable methods required for the measuring of the water volumes..." can be considered to measure water volumes. We have provided alternative 'suitable' methods to accurately calculate water usage. We believe the INAC Inspector is not being 'reasonable' in his approach.

On this basis, we ask the Minister and/or the NWB to not force Comaplex into a system that gives a false reading of water consumption on which fees are charged. We have provided a detailed account of actual water usage and do not understand why this

accounting is not suitable. We have paid water usage fees based on this accounting in the past and it has been accepted. If the water use accounting that Comaplex has provided is not acceptable to the NWB, then we would like to work with you to determine some method to equitably resolve this issue.

3) Sump/Wetlands Area: The INAC letter dated August 1, 2008 reviewing Comaplex's Site Water Management Plan suggested that we "begin the process of finding alternatives to its grey-water treatment ...". It does not impose a 30 day directive. Comaplex understands that we are approaching the limits of our grey water sump. In fact, we tried to have a waste water treatment plant brought up by Hercules aircraft in April 2008 - no supplier in Canada had one available that would fit inside the aircraft. Consequently, Comaplex ordered a waste water treatment system early this summer. This system will be barged to Rankin this fall, along with a new wash car, and installed this winter. It will take care of all grey water and sewage. Despite this being told to the INAC Inspector, this was not mentioned or even considered in his Inspection Report demands.

With respect to the current grey water sump, this system, like all wetlands areas, ultimately drains into a lake. In response to suggestions by the KIA in a site visit two weeks prior to the INAC Inspection, Comaplex installed a series of baffles in the wetlands area that greatly increases the exposure of the grey water to a much larger portion of the wetland. The wetlands system is designed such that all particulate matter drops out and all potentially harmful substances in the water are filtered off. This system has been successfully in place for over 15 years. Contrary to point 3 in the INAC Inspector's report, at no time was grey-water ever deposited directly into Meliadine Lake. Samples taken for water quality monitoring in the lake near the base of the wetland have shown no consistent adverse effects to the lake water quality.

As per the NWB letter dated August 14, 2008 approving our Site Water Management Plan, Comaplex has carefully considered the INAC comments dated August 1, 2008 and we have taken serious steps (Waste Treatment Plant and new wash cars) to alleviate all of these concerns. Comaplex requests that we be allowed to continue with the present grey-water system until the end of the current season's exploration program, some time in October 2008, at which time the camp will be largely shut down. The water treatment plant and wash car are scheduled to be installed this winter.

4), 5), 6) Insta-berm Secondary Containment for Fuel Bladders: The remaining fuel in the two bladders has been pumped out and transferred to the 50,000 liter Enviro tanks. The bladders and berms will be rolled up and stored as per our practice of previous years. This will effectively deal with items 4), 5), and 6) of the INAC Inspector's report.

To be noted, it has always been Comaplex's assertion that the bladder and berm usage on the Meliadine project is a temporary situation. The fact of the matter is that neither bladder was filled to capacity (each had approximately 95,000 liters of fuel or 84% of capacity. Consequently, the berms had 125% capacity in the event of a possible leak,

which easily compensated for the small indentations from the gravel on the berm sides. This was not mentioned in the INAC Inspector's report.

The gravel supporting the structure was put there to reinforce the structural integrity of the berm, which was a concern for the same INAC Inspector last year. With regards to the INAC Inspector's comment on "the inside wall now may act as a pathway to propel the pressure wave of fuel overtrop and outside of the containment area", we again question his qualifications to make such comments and the applicability of such statements in an Inspection report.

7) Barrier: As mentioned above, the bladders and berms will be rolled up shortly for the season; however, to directly address the INAC Inspector's comments, there was a gravel/mine-rock barrier (topped with large rocks) installed at all positions where vehicles might be active near the berms. This was put in at the request of KIA and inspected and approved by the KIA. There is no barrier on the north side of the containment because this is the edge of the waste pad and equipment does not go there (would have to somehow climb up the side of the pad). We do not understand the reason for this demand when the structure was already in place.

8) Contaminated Soil Land Farm: The land farm on the site was constructed at the request of the KIA and was inspected and approved by them just prior to the INAC Inspection. Comaplex does not understand the INAC Inspector's comment that "the location (close proximity to water run-off from the waste rock piles and a standing body of water) ... may pose a hazard to water and the environment". We put the soil on the land farm to stop it from being a hazard. The soil was placed on thick plastic, on a waste pad sloped to drain into a dry basin, which is the area of primary containment for the pad itself, which is situated on our Commercial Lease, with a \$950,000 security bond attached to it. We, and the KIA, considered this to be a reasonable, safe, and prudent approach. We were not aware we required the INAC Inspector's prior approval for the land farm as it is a land use issue. We will however, apply to the NWB for an amendment to the current license, but question the INAC Inspector's comments on this issue.

9) Sampling Reports: Comaplex has diligently supplied the KIA and the Nunavut Water Board with reports of all of the baseline sample data, the monthly water quality sampling data, and soon, the 2008 Golder sample data from ongoing environmental baseline studies. All of the baseline data that the INAC Inspector requested is in the original Underground Exploration Program Application, which is posted on the NWB website. This has been relayed to the INAC Inspector several times, without effect. We are not sure from one month to the next, who the Inspector is for our region as it appears to change without notification to us. For this reason, we consider it reasonable for the INAC Inspector to be able to download the data from the NWB website.