



Water Resources Division  
Nunavut Regional Office  
Iqaluit, NU X0A 0H0

Our File: 9545-1 / CIDMS 176432

Your File: 2BB-MEL0709

October 16, 2007

Richard Dwyer  
Licensing Trainee  
Nunavut Water Board  
Gjoa Haven, NU X0B 1J0

**Re: 2BB-MEL0709 / Comaplex Minerals Corporation / Meliadine West  
Exploration and Bulk Sampling Project / Kivalliq Region / Waste Rock and  
Ore Storage Management Plan**

On behalf of Indian and Northern Affairs Canada (INAC), I have reviewed the above mentioned Waste Rock and Ore Storage Management Plan submitted by Comaplex Minerals Corporation (CMC) for the Meliadine West Exploration and Bulk Sampling Project. The following advice has been provided pursuant to INAC's mandated responsibilities for the enforcement of the *Nunavut Waters and Nunavut Surface Rights Tribunal Act* and the *Department of Indian Affairs and Northern Development Act*.

The Meliadine West Exploration and Bulk Sampling Project Waste Rock and Ore Storage Management Plan has been provided to the Nunavut Water Board in accordance with Part E, Item 6 of its 2BB-MEL0709 licence.

Indian and Northern Affairs Canada recommends that the following comments be taken into consideration when reviewing the submitted Plan.

1. All rock sample analysis procedures should be described in detail. The Potential Risks, Related Mitigation Measures, and Monitoring section of this Plan indicates that all rock types have been assayed and tested for acid rock drainage, neutralization potential, and metal leachate characteristics.
2. All rock sample analyses should conform to a Quality Assurance / Quality Control Plan accepted by the Nunavut Water Board. The proponent must submit such a Plan to satisfy Part J, Item 9 of its 2BB-MEL0709 licence. The Waste Rock and Ore Storage Management Plan and the Quality Assurance / Quality Control Plan should cross reference each other.
3. CMC should provide the ARD and metal leaching potential of the three (3) rock types that will be brought to surface. These rock types are (1) bedrock from surface to the access portal, (2) underground decline, and (3) ore. The Potential Risks, Related Mitigation Measures, and Monitoring section of this Plan states that assay and solubility

tests on the waste rock used for construction and storage pads show a strong neutralization potential with generally low solubility for metals. This section also states that the NP/AP ratios for ore are generally positive but show a modest risk for acid generation. The submitted Plan does not describe the methodology used to assess neutralization potential, or any other form of rock analysis, and does not provide quantitative data to support its determination of acid rock drainage and metal leachate properties within the three (3) rock types.

4. Detailed descriptions of the waste rock and ore storage pads should be included within the Plan. The neutralization protection of the waste rock used to construct the pads should be provided in addition to each pads storage capacity, precipitation runoff containment design, and decant procedures.

5. An Operations and Maintenance Plan for project infrastructure should be developed. This Plan should address those activities required for the management of the waste rock and ore storage pads (e.g., berm inspection, snow removal, decant, rock placement, rock removal, and reporting obligations). The Operations and Maintenance Plan and the Waste Rock and Ore Management Plans should cross reference each other.

6. According to the submitted water quality in the area of the waste rock and ore storage pads will be monitored as set out in the Site Water Management Plan. To date, this Plan has not been submitted to the Nunavut Water Board. Once this Plan is developed, the Waste Rock and Ore Management Plan should be revised to include references to applicable sections of the Site Water Management Plan (e.g., proposed monitoring plan including parameters, proposed discharge limits, and frequency of sampling and analysis).

7. Cross sectional design drawings for the berms and base of the waste rock and ore storage pads should be included within this Plan. These drawings should be signed and sealed by a registered professional.

8. As built design drawings of the Ore and Waste Rock Storage Plan, and the cross sections of the waste rock and ore storage pad berms and base should be included in a revised Waste Rock and Ore Storage Plan once the waste rock and ore storage plans are constructed.

Indian and Northern Affairs Canada requests notification of any changes in the proposed project, as further review may be necessary. Please contact me should you have any questions or comments with regards to the foregoing. I can be reached by telephone at (867) 975-4555 or by email at [AbernethyD@inac-ainc.gc.ca](mailto:AbernethyD@inac-ainc.gc.ca).

Regards,  
***Original signed by***

David W. Abernethy  
Water Resources Coordinator

Cc. Jim Rogers, Manager of Water Resources – Indian and Northern Affairs Canada,  
Nunavut Regional Office