



Water Resources Division
Nunavut Regional Office
Indian and Northern Affairs Canada
Iqaluit, NU X0A 0H0

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August 1, 2008

Richard Dwyer
Licence Administrator
Nunavut Water Board
Gjoa Haven, NU X0B 1J0

**Re: 2BB-MEL, Meliadine West Exploration and Bulk Sampling Project,
Meliadine West Gold Project, Kivalliq Region, Site Water
Management Plan**

Please be advised that Indian and Northern Affairs Canada (INAC) has completed a review of the June 2008 Meliadine West Gold Project, Water Management Plan submitted by Comaplex Minerals Corporation to the Nunavut Water Board (NWB) for approval. This plan is a requirement of Part E, Item 5 the amended NWB licence # 2BB-MEL0709.

The Meliadine West Exploration and Bulk Sampling Project is operated by Comaplex Minerals Corporation and involves the exploration of gold deposits in the area. The project is located in the Kivalliq Region approximately 35 km Northwest of Rankin Inlet. The amended licence 2BB-MEL0709 was issued in July 2007 to allow for the use of water and the disposal of waste for the exploration and bulk sampling project.

The following recommendations/comments are provided pursuant to INAC's mandated responsibilities pursuant to *Nunavut Waters and Nunavut Surface Rights Tribunal Act* and the *Department of Indian Affairs and Northern Development Act*.

- INAC recommends that the Site Water Management Plan be reviewed and updated on an annual basis to make certain that site water management practices implemented are accurate and efficient. The main objective of this Site Water Management Plan is to determine the quantity and quality of freshwater entering and exiting the project area. This information should be reviewed by the proponent on an annual basis to reflect the effects of the project on freshwater sources.
- On Page 5 of the Site Water Management Plan, the proponent, when describing flow through systems, states "Installing water meters on intakes of

these systems will not record water consumption". It is the opinion of this office that water meters installed on the end of pipe (or pipes) will determine the amount of water taken from the lake and the installation of such should be required. Without flow meters or other such devices, it is unknown how much water actually returns to the lake that the water was drawn from. Too much draw down will expose the banks of the lake causing it to erode and increase the TSS in the lake.

- Spill contingency measures are applicable to site water management operations due to the potential of freshwater sources becoming contaminated from any released hydrocarbon products. Regular monitoring of the entire site is required to ensure that spills from fuels or other sources which may impact water quality are cleaned up in an expedient manner prior to any impacts to water occurring.
- The proponent should begin the process of finding alternatives to its grey-water treatment as the present system is nearing capacity. Detailed information of any proposed system designs must be sent to the NWB for approval.
- All drilling waste should be contained in the drill waste sump at least 30 m from the normal high water mark to prevent contamination caused by surface water run-off. Drill casings should be removed or cut-off and each hole should be sealed and capped to prevent permafrost degradation.
- Description of site specific water management practices should be included in the plan i.e. use of erosion control, surface water collection, and surface water diversion measures should be noted. The locations for the installation of silt fences, pathway of wastewater effluent as well as collection areas of precipitation runoff from excavation areas and waste and ore storage stockpiles should be indicated in the plan and the NWB should be informed of any future changes.
- All water contained in the Sump and Primary Containment areas as well as other water retention areas must be sampled before discharge to any receiving environment. The water quality must meet the discharge criteria and all other conditions of the current NWB license as well as CCME Guidelines for the Protection of Aquatic Life.

Please feel free to contact me should you have any questions or concerns. I can be reached at (867) 975-4568 or email at RumboltI@inac.gc.ca.

Regards,

Original signed by

Ian Rumbolt
Regional Coordinator

Cc. Kevin Buck, Manager of Water Resources – INAC, NRO