



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

Our File: 9545-2-2MELG / CIDMS 182459

Your File: 2BB-MEL0709

November 15, 2007

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

Re: 2BB-MEL0709 / Comaplex Minerals Corporation / Meliadine West Gold Project / Kivalliq Region / Abandonment and Restoration Plan

On behalf of Indian and Northern Affairs Canada (INAC), I have reviewed the above mentioned Abandonment and Restoration Plan submitted by Comaplex Minerals Corporation (Comaplex) for its Meliadine West Gold 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* (NWNSRT) and the *Department of Indian Affairs and Northern Development Act* (DIAND Act).

Comaplex Minerals Corporation has prepared an Abandonment and Restoration Plan for its Meliadine West Gold Project in accordance with Part I: Conditions Applying to Abandonment and Restoration or Temporary Closing of the 2BB-MEL0709 water licence. Indian and Northern Affairs Canada recommends that the following comments be considered when reviewing this Plan:

1. The scope of the submitted Abandonment and Restoration Plan should be expanded to include all activities associated with the Meliadine West Gold Project. This Plan is specific to underground exploration and bulk sampling activities. As a result, matters associated with the work camp, fuel storage area, drilling operations, security arrangements, and any other issues associated with the project have not been addressed in sufficient detail. INAC recognizes that Comaplex has previously submitted two abandonment and restoration plans for the Meliadine West Gold Project. Having multiple Abandonment and Restoration Plans for this project is not preferred. Rather, a stand-alone document which addresses all aspects of the reclamation program to be implemented upon the project's final and/or interim closure should be provided to the Nunavut Water Board for review.
2. The proponent intends to deposit a total of 6,400 cubic metres of potentially acid generating ore underground in the ramp and drifts where it will become encapsulated in permafrost. INAC recommends that a detailed monitoring plan be developed for this reclamation activity so that the Nunavut Water Board and other interested parties can be informed of temporal freeze-back conditions within the ore

and correspondingly, the prevention of surrounding freshwater contamination from acid rock drainage and metal leachate.

3. The Plan should provide greater detail regarding the underground placement of any inert, non combustible materials in the box cut or in the decline. Of particular interest, INAC is interested in knowing whether hazardous materials will be removed from such materials and if they will be cut to appropriate dimensions and compacted to minimize the occurrence of voids and ice-lenses.
4. According to the submitted Plan, waste oil and soils contaminated by small spills will be placed in 45 gallon drums and brought to the Hamlet of Rankin Inlet for disposal and/or remediation. INAC is curious to know if the Hamlet of Rankin Inlet is capable and willing to treat such waste materials. A written letter of consent for this type of activity from the Hamlet of Rankin Inlet should be included in the project's Spill Contingency Plan and be referenced in the Abandonment and Restoration Plan.
5. The Plan should describe additional remediation measures that will be implemented at spill sites following the removal of contaminated soils. The Plan states that remaining soil will be treated to reduce the contaminated to acceptable levels but does not indicate how the soils will be treated and monitored.
6. Comaplex should specify what acceptable levels of hydrocarbon contaminated soil are. The Canadian Council of Ministers of the Environment Canada-Wide Standards for Petroleum Hydrocarbons (PHC) in Soil (2001) and the Government of Nunavut's Environmental Guideline for Site Remediation (2002) should be consulted when making such a determination.

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.

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