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Serving the
communities of

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Cape Dorset

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Resolute Bay

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Sanikiluaq

December 5th, 2007

Phyllis Beaulieu
Manager of Licensing
Nunavut Water Board
P.O. Box 119
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Tel: (867)360-6338
Fax: (867)360-6369

via email

**RE: Baffinland- Mary River Project, 2BB-MRY0710,
Site Water Management Plan, Revised Site Water Management
Plan, Environmental Monitoring Plan, Surface Water Sampling
Program-Quality Assurance and Quality Control Plan and Bulk
Sample Management Plan.**

Dear Ms. Beaulieu,

The Department of Lands and Resources within the Qikiqtani Inuit Association (QIA) has reviewed several information requirements for Baffinland's Mary River Project. In reviewing this application, QIA has made reference to all documents contained in the 2BB-MRY0710 file on the Nunavut Water Board's (NWB) FTP-site.

Site Water Management Plan

Section 1.2, Water Licence Requirements, states "surface water samples are collected throughout the Mary River Exploration Property...analytical results are used to identify water quality trends and potential impacts to surface water". QIA recognizes these water sampling sites are in addition to the required SNP sites listed in 2BB-MRY0710. QIA requests to know how Baffinland intends to make the additional water quality data available for reviewers. QIA requests the ability to view this information (as per Part B (5xiii), General Conditions, of 2BB-MRY0710) in a format amenable to statistical analysis.

Part F (5), Conditions Applying to Drilling Operations, specifically states "on-ice drilling has not been authorized with-in this licence". Section 1.2, Water Licence Requirements, states Baffinland will seek clarification from the

Board as it related to this activity. Though QIA appreciates Baffinland's desire to drill at Milne and Steensby Inlets, QIA nonetheless requests Baffinland file an amendment to the licence 2BB-MRY0710 prior to any on-ice drilling.

Section 6.0, Monitoring, should be updated to include a clear reference indicating who is responsible for monitoring a particular project aspect. Furthermore, it is not clear if there is a monitoring recording and reporting system in place. QIA requests Baffinland develop a method for recording monitoring results. Additionally, QIA requests the ability to review project monitoring results on an as-needed basis. Finally, QIA has interpreted routine inspections to mean daily inspections. If this interpretation is incorrect, QIA requests that Baffinland further clarify the intended meaning of routine.

Section 6.3, Weekly Reporting, QIA requests the ability to review weekly reports on an as-needed basis.

General Comments

QIA requests Baffinland record the location of all waste disposal sites, water intake sites, stream crossings, areas where equipment forded water crossings, fuel storage areas (including temporary storage), sumps and grey water disposal areas. These areas should be clearly identified in a table, appended to this plan. The table should include information such as the location, type of impact and duration of impact. This table should be cross referenced to surface maps which clearly show the location of impacted areas relative to surface land marks and water bodies.

The Site Water Management Plan (SWMP) should make reference to 2BB-MRY0710 Part B (6), General Conditions. From QIA's perspective these elements are largely absent from the SWMP. QIA requests Baffinland explicitly state how the SWMP has taken into account the above referenced licence conditions.

Where documents are cross referenced, QIA requests Baffinland list the section and page number of the report they are referencing. The SWMP has numerous cross-references, all of which are lacking such detail. QIA feels this comment should apply to all documents required under 2BB-MRY0710.

Surface Water Sampling Program-Quality Assurance and Quality Control Plan

Section 2.3, QA/QC Samples should explicitly state a definition for field blanks, trip blanks and field replicates.

The Sample Chain of Custody form does not include a section for identifying whether preservatives were added and whether or not this occurred in the

field. Furthermore, there is no section for the sampler to indicate what time the sample was taken. Additionally, the form should include a section for the sampler to denote the date and destination samples were shipped. Given the time sensitive nature of several sampling parameters (as indicated in Section 2.2 of the QA/QC Plan) QIA views this information as pertinent. As a follow-up to Section 2.2, how does Baffinland intend on reporting the success of samples being analyzed within the preferred holding time? Finally, does Baffinland anticipate sealing all samples prior to shipping?

The Record of Water Sampling Field Parameter Measurements should include a place for the sampler to record the date and time the last calibration took place for the field sampling equipment.

General Comments

Section 3.2.4 of the *Quality Assurance (QA) and Quality Control (QC) Guidelines for use by Class "B" Licensees in Collecting Representative Water Samples in the Field and for Submission of a QA/QC Plan* (INAC, 1996) should be included in Baffinland's QA/QC Plan.

Certain readers of the QA/QC Plan may not be familiar with this type of material. Thus, a series of flow charts describing the sampling program (what, when, where and how) would be beneficial.

The QA/QC Plan does not appear to address toxicity testing as required under Part I (4) of 2BB-MRY0710. QIA requests that this information be added to Baffinland's QA/QC Plan.

The make and model of field equipment used for field measurements should be listed in the QA/QC Plan.

Bulk Sampling Management Plan

General Waste Characterization

The Bulk Sampling Management Plan (BSMP) mentions an additional 45 samples are pending geochemical characterization. QIA requests Baffinland update their previously submitted information on ARD/ML once this information is available. QIA acknowledges the following three files attached as part of the BSMP have previously been presented to the NWB under Appendix A of the Abandonment and Restoration Plan. Thus, in presenting new information QIA requests Baffinland include a cover letter describing how updated information relates to the original ARD/ML predictions. Finally, QIA requests the updated ARD/ML information is forwarded to the NWB for further review by interveners.

Monitoring and Reporting

Sampling locations for SNP sites: MRY-8, MRY-9, MRY-10, should be selected to ensure the most representative analytical results, as determined by an appropriately qualified professional.

QIA hopes that the above comments will improve the function of the plans reviewed. Please do not hesitate to contact our Environmental Technician with any questions or comments with regards to the foregoing at (867) 975-8419 or by email at envirotech@gia.ca.

Yours Truly,

A handwritten signature in blue ink, appearing to read 'J. Amagoalik', is written over the 'Yours Truly,' text.

John Amagoalik

Director of Lands and Resources