



Lupin Operation
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June 8, 2005

by email

Licensing Manager
Nunavut Water Board
P.O. Box 119
Gjoa Haven, NU
X0B 1J0

RE: Response to Comments Regarding 2004 Final Abandonment and Restoration Plan – Lupin Mine

Dear Ms. Beaulieu,

In response to your letter, dated May 31, 2005, regarding the 2004 Final Abandonment and Restoration Plan for the Lupin Mine, Kinross Gold Corporation (KGC) on behalf of Echo Bay Mines Limited, hereby submits a response to the representations provided by the interested parties. The KGC responses are organized according to the interested party and are provided below.

DEPARTMENT OF ENVIRONMENT, GOVERNMENT OF NUNAVUT (DoE)

The DoE agrees with the KGC proposal to proceed with the Abandonment & Restoration (A&R) of the tailings containment area (TCA) provided that Kinross can demonstrate how the two A&R plans can be isolated. Administratively, KGC trusts that the Nunavut Water Board (NWB) will provide this information to DoE to address this request.

The physical separation of the Lupin TCA from the remainder of the Lupin mine site however is readily achieved in that the Lupin tailings facility is geographically separated from the mine site by a distance of approximately three kilometers. This is documented in the maps and air photos that were provided in the A&R document submission. The only connection between the two areas is an access road and the tailings disposal line, through which the mill tailings were transported to the tails disposal area. The roadway will continue to be used during the period of TCA reclamation to allow access for the heavy equipment required to carry out the TCA reclamation activities. During final reclamation, the roadway and pipeline leading from the process area to the tailings containment area will be completely removed and/or reclaimed. This will isolate the tailings containment area such that it will not be affected by other ongoing reclamation activities conducted at the main Lupin mine site. As indicated in the A&R Plan

submission, the reclamation activities that are to take place in the camp area are completely separate from those to remediate the TCA.

Indian and Northern Affairs Canada – Water Resources Division (INAC)

INAC is generally supportive of the approach to treat the Lupin tailings facility under a separate A&R plan subject to four conditions. These are discussed as follows:

Condition 1 states that in the opinion of INAC, the closure plan for the TCA is in need of additional technical review before final approval. KGC acknowledges INAC's desire to further review the TCA closure plan and will accommodate their schedule to the extent practical and possible.

Condition 2 requests that the NWB provide clear guidance on the review and approval process if the TCA and remaining Lupin site are to be dealt with under separate A&R plans. KGC trusts that the NWB will provide this requested information to INAC.

Condition 3 states that a holistic evaluation of the TCA is required to support the final A&R plan. The proposed TCA reclamation activities, reclamation completed to date, ecological, hydrological, geochemical, and physical evaluations, future proposed monitoring and contingency planning have been provided in the February 28, 2005 submittal of the 2004 Final A&R plan. These elements as applied to the TCA however will be extracted from the February 28, 2005 submittal and compiled into a stand-alone document for final review and approval.

Condition 4 states that if the TCA is to be treated separately from the main Lupin mine site, the Licensee must demonstrate that the TCA reclamation can be undertaken and completed as an independent A&R component. As mentioned earlier, the TCA is geographically isolated from the other Lupin infrastructure and process areas by a distance of approximately 3 kilometers. During final reclamation, the roadway and pipeline leading from the process area to the TCA will be completely removed and/or reclaimed. This will isolate the tailings containment area such that it will not be affected by reclamation or other activities being conducted at the mine site area.

Environment Canada (EC)

EC states that they have no concerns with reviewing the TCA Closure Plan in advance of the remainder of the A&R Plan nor with continuing the reclamation of the TCA in advance of the remainder of the Lupin site. KGC understands that we will not be able to place any other components of the mine site into the tailings area as part of ongoing reclamation activities elsewhere. We also fully intend to compile the TCA A&R plan into a stand-alone document that addresses areas such as short and long-term monitoring, climate change considerations, spill/emergency response, and will include any infrastructure associated with the TCA.

Fisheries and Oceans Canada (DFO)

DFO is also generally supportive of the proposed approach but requests guidance from the NWB on the necessary procedures to review and approve the two A&R plans and

would like the TCA A&R plan as a stand-alone document. As stated above, KGC fully intends to compile the TCA A&R plan into a stand-alone document that addresses the necessary components required to fully evaluate the reclamation, monitoring and closure of the TCA.

Once again, KGC trusts that the NWB will provide DFO with administrative guidance for the review and approval process.

Kitikmeot Inuit Association (KIA)

KIA states that they are aware of community concerns regarding the reclamation of the TCA. As such, KGC is prepared to provide community consultation through formal presentation on the proposed TCA reclamation and closure activities. It is anticipated that this presentation would be held in Kugluktuk in mid to late summer 2005 and would provide an opportunity to address specific questions and concerns.

A common thread in the various submissions is the desire of the agencies to be presented with a stand-alone plan for the reclamation of the TCA. KGC intends to compile the information contained in the existing A&R plan into a stand-alone document that addresses the necessary components required to fully evaluate the reclamation, monitoring and closure of the TCA. This TCA A&R Plan will be submitted to the Water Board by June 30, 2005.

Kinross Gold Corporation would like to thank all the parties for their comments.

Regards,

A handwritten signature in cursive script that reads "Michael Tansey".

Michael Tansey
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cc: Bill Goodhard, KGC
Shawn Healey, KGC
Mark Ioli, KGC