

26 February 2010

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

**RE: Licence 2BB-MEL0914: Request for licence amendment: Geotechnical Drilling in support of the upcoming Feasibility Study**

Dear Ms. Beaulieu;

Comaplex Minerals is requesting an amendment to its water licence, 2BB-MEL0914, to allow geotechnical drilling along the proposed all-weather road between Rankin Inlet and the proposed mine site, along the Discovery spur road connecting to the main road, and within the Hamlet of Rankin Inlet. Up to 60 geotechnical drill holes are to be drilled to a depth of approximately 10 metres with several of the holes being within 31 metres of water. These holes are not being drilled to look for mineralized deposits but to determine the structural integrity of the subsurface along the proposed road and within the Hamlet of Rankin Inlet.

All drilling is to take place on NTI parcel RI01, and some within the municipal boundaries of Rankin Inlet. Figure 1 shows the proposed road between Rankin Inlet and the mine site. Geotechnical drilling is expected near various water crossings, and at possible rock and granular quarries. These geotechnical investigations are a necessary part of a feasibility study planned by Comaplex for 2010. The drilling will assist in determining the type and location of river crossings and where the quarries are possible along the proposed road. Within the Hamlet of Rankin Inlet, the drilling will assist in locating mine infrastructure. This includes a tank farm, laydown area and possibly a warehouse.

The geotechnical drilling program will be helicopter supported in moving the drill(s) from one location to the next, while in winter overland equipment may be used to move the drills. The time required to drill each geotechnical hole will be 3 to 4 hours. Seeing a drill uses on average 53 m<sup>3</sup>/day, the quantity of water used for each geotechnical drill hole would equal approximately 9 m<sup>3</sup>. A maximum of two holes would be drilled any one day thereby remaining well within the quantity of water allowed under Comaplex's water licence. No additives such as CaCl<sub>2</sub> will be used; the water will simply be heated to assist drilling in permafrost. Fuel for drilling will be delivered by helicopter on an as-needed-basis and will be held within secondary containment or double walled tanks. The drill holes will be triple barreled and of NQ or HQ<sup>1</sup> size. Lastly, a screen will be installed on the drill's water intake to avoid the entrainment/impingement of fish.

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<sup>1</sup> NQ has a drill rod diameter of 47.6 mm while HQ has a diameter of 96 mm.

Even though some of the geotechnical drilling will be within 31 m of water, there is no in-stream drilling planned. Some of the drilling will be immediately adjacent to water in the case of water crossings for the proposed road but not directly in the water. Every effort will be made to prevent drill fluids, drill cuttings and drill sludge from entering waters<sup>2</sup> frequented by fish<sup>3</sup>. These fluids, cuttings and sludge will be directed to a sump or depression at least 31 m above the ordinary high water mark. All garbage and waste will be removed from the site and returned to the exploration camp. Comaplex will adhere to Fisheries and Oceans' Operational Statement for Mineral Exploration Activities and will have the operational statement posted at the work site for ready reference by Comaplex's field supervisor(s) and its drilling contractor(s).

Upon completion of each hole, as set out in Comaplex's Abandonment and Restoration Plan, the casing will be pulled or cut off below ground level and, if necessary, the area will be reclaimed using peat moss and fertilizer to promote the recovery of any vegetation that was disturbed during drilling and for the re-establishment of vegetation where plants were lost.

Finally, no drilling is to be undertaken within 30 m of known heritage sites unless the sites are first mitigated. In cases where inadvertent disturbance is possible, Comaplex will contract a professional archaeologist to mitigate the sites before undertaking any drilling activities. This work is to be carried by a professional archaeologist under permit of the Department of Culture, Language, Elders and Youth.

It should be noted that an application for some of the above noted work has also been made to Indian and Northern Affairs Canada to undertake exploratory and geotechnical drilling on Federal Claim PB1 (F69574) under file number N2010C0002. In support of this application, Nunavut Impact Review Board Part 1 and 2 forms were completed under file 10EN006.

Should you have questions or concerns, please do not hesitate in calling me at 403 265 2846 or [JWitteman@Comaplex.com](mailto:JWitteman@Comaplex.com).

Yours sincerely,

John Witteman  
Comaplex Minerals Corp.

Cc. Nunavut Impact Review Board  
Samuel Wahab, Community Planner, Department of Community & Government Services  
Mayor John Hickers and Council, Hamlet of Rankin Inlet  
Paula Smith, Environment Canada, Iqaluit  
Gary Cooper, Habitat Biologist, Fisheries and Oceans Canada  
Nicola Johnson, Environmental Assessment Analyst, Fisheries and Oceans Canada  
Julie Ross, Department of Culture, Language, Elders and Youth  
Mark Balog & Doug Dumka, Comaplex Minerals Corp.

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<sup>2</sup> A spill kit will be kept at the drill site and the drilling crew will be trained in spill prevention and clean-up.

<sup>3</sup> The basis for saying which streams are frequented by fish is the report, "*Meliadine West Gold Project: Fisheries Baseline Studies 2008*". A compact disk having this report is attached for your information.