

Water Resources Division Resource Management Directorate Nunavut Regional Office P.O. Box 100 Igaluit, NU, X0A 0H0

> Your file - Votre référence 2BE-MRY1421 Our file - Notre référence GCdocs#91286357

March 1, 2021

Richard Dwyer Manager of Licensing Nunavut Water Board P.O. Box 119 Gjoa Haven, NU, X0B 1J0 E-mail: licensing@nwb-oen.ca

Re: Crown-Indigenous Relations and Northern Affairs Canada Review of the Licence Renewal Application for Baffinland Mary River Exploration, Type B Water Licence No. 2BE-MRY1421

Dear Mr. Dwyer,

Thank you for the January 29, 2021 invitation to review the referenced licence renewal application, submitted by Baffinland, for Type B Water Licence No. 2BE-MRY1421.

Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC) examined the application pursuant to its mandated responsibilities under the Nunavut Waters and Nunavut Surface Rights Tribunal Act and the Department of Crown-Indigenous Relations and Northern Affairs Act. Please find CIRNAC comments and recommendations in the attached Technical Memorandum.

If there are any questions or concerns, please contact me at (867) 975-4282 or bridget.campbell@canada.ca.

Sincerely,

Bridget Campbell, Water Management Coordinator, Acting Manager



Technical Review Memorandum

Date: March 1, 2021

To: Richard Dwyer – Manager of licensing, Nunavut Water Board

From: Bridget Campbell - Water Management Coordinator Acting Manager, CIRNAC

Subject: Crown-Indigenous Relations and Northern Affairs Canada Review of the Licence Renewal Application for Baffinland Mary River Exploration,

Type B Water Licence No. 2BE-MRY1421

A. BACKGROUND

'Mary River is located on Baffin Island in the Qikiqtaaluk Region of Nunavut, about 176 km (109 mi) southwest of Pond Inlet Inuktitut: Mittimatalik, 'the place where the landing place is'. The Inuit name for the Mary River mountain is Nulujait. There is a 4,000 year history in the area. For hundreds of years Inuit from the region, met at Mary River during the summer hunting caribou. By 2011, the population of the region was about 5,400 people, many of whom continued the traditional hunting and fishing lifestyle living off the land'. Modified from Google.

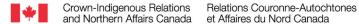
According to Baffinland's Project Description and Application (January 27, 2021):

Baffinland Iron Mines Corporation (Baffinland) has enclosed an application for renewal of its current Type 'B' Water Licence 2BE-MRY1421 (the Licence) to permit ongoing exploration activities on its mineral leases in the Qikiqtani Region of Nunavut. All activities listed under the renewal application have been permitted in the past and are consistent with current exploration and geotechnical drilling activities.

CIRNAC provides the following comments and recommendations pertaining to the application package. A summary of the subjects of recommendations can be found in Table 1. Documents reviewed as part of this submission can be found in Table 2 of Section B. Detailed technical review comments can be found in Section C.

Table 1: Summary of Recommendations

Recommendation	Subject
Number	
R-01	Water Pipeline Removal
R-02	Sewage Plant
R-03	Updated Plans



B. DOCUMENTS REVIEWED

The following table (Table 2) provides a summary of the documents reviewed under the submission.

Table 2: Documents Reviewed

Document Title	Author, File No., Rev., Date
Exploration Closure and Reclamation Plan 2021	Baffinland Iron Mines Corporation, Revision 2, January 25, 2021
Exploration Spill Contigency Plan 2021	Baffinland Iron Mines Corporation, Revision 1, January 25, 2021
Project Description and Application	Baffinland Iron Mines Corporation, January 27, 2021
Application Water Licence	Baffinland Iron Mines Corporation, January 22, 2021

C. RESULTS OF REVIEW

1. Water pipelines removal

Comment:

CIRNAC has noted that in the previous 2014 Exploration Closure and Reclamation Plan. there were plans for the water pipelines to be removed. There are no plans for the removal of water pipelines in the 2021 Exploration Closure and Reclamation Plan.

Recommendation:

(R-01) CIRNAC recommends that Baffinland provide clarification as to why the information pertaining to the water pipelines has not been included in the 2021 version of the Exploration Closure and Reclamation Plan.

2. Sewage Plant

Comment:

CIRNAC sees that there may be potential for the need of a sewage plant for the camps in Baffinland's Project Description and Application. It is not clear if the sewage plant is to be included in the scope of this licence renewal. If so, information pertaining to its operation and removal should be reflected in the Application, the Exploration Closure and Reclamation Plan, the Spill Contingency Plan and the Security Estimate.

Recommendation:

(R-02) CIRNAC recommends that Baffinland clarify whether or not they want the sewage plant considered in the scope of this application. For the application to move forward with



the sewage plant included, the sewage plant details need to be reflected in the Application, the Exploration Closure and Reclamation Plan, the Spill Contingency Plan and the Security Estimate.

3. Updated plans

Comment:

CIRNAC has not reviewed the Trenching Plan because it was not in the application.

Recommendation:

(R-01) CIRNAC recommends that Baffinland provide confirmation and proof that other plans have been updated to fit this new application.