



ᐃᖃᖃᖃᖃᖃᖃᖃᖃ  
ᐃᖃᖃᖃᖃᖃᖃᖃᖃᖃ

Serving the  
communities of

ᐃᖃᖃᖃᖃᖃᖃᖃᖃ  
Arctic Bay

ᖃᖃᖃᖃᖃᖃᖃᖃᖃᖃ  
Clyde River

ᐃᖃᖃᖃᖃᖃᖃᖃᖃᖃ  
Grise Fiord

ᐃᖃᖃᖃᖃᖃᖃᖃᖃᖃ  
Igloolik

ᐃᖃᖃᖃᖃᖃᖃᖃᖃᖃ  
Iqaluit

ᖃᖃᖃᖃᖃᖃᖃᖃᖃᖃ  
Kimmirut

ᖃᖃᖃᖃᖃᖃᖃᖃᖃᖃ  
Kinngait

ᐃᖃᖃᖃᖃᖃᖃᖃᖃᖃᖃ  
Pangnirtung

ᖃᖃᖃᖃᖃᖃᖃᖃᖃᖃᖃ  
Pond Inlet

ᖃᖃᖃᖃᖃᖃᖃᖃᖃᖃᖃ  
Qikiqtarjuaq

ᖃᖃᖃᖃᖃᖃᖃᖃᖃᖃᖃ  
Resolute Bay

ᖃᖃᖃᖃᖃᖃᖃᖃᖃᖃᖃ  
Sanikiluaq

ᖃᖃᖃᖃᖃᖃᖃᖃᖃᖃᖃ  
Sanirajak

March 1, 2021

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

**Re: Baffinland Iron Mines Corporation's Type 'B' Water Licence 2BE-MRY1421 Renewal Application for the Mary River Exploration Project**

Richard,

Baffinland Iron Mines Corporation's (Baffinland) renewal application for the Type 'B' Water Licence 2BE-MRY1421<sup>1</sup> (the Licence) was distributed for comments from interested parties by the Nunavut Water Board (NWB) on January 29, 2021. QIA has reviewed the application and presents 25 Technical Comments for the consideration of the NWB, Baffinland and interested intervenors (see Appendix).

QIA notes that Baffinland indicated in their application that they currently hold a Land Use Permit (QL2-2012) for access to Inuit Owned Land parcels PI-14 and PI-15. This Permit expired on December 31, 2020 and is no longer active. Baffinland is not currently permitted to access PI-14 and PI-15 until a new application for access to Inuit Owned Land is first reviewed and approved by the Mittimatalik Community Lands and Resources Committee and a new Land Use Permit is issued by QIA.

Sincerely,

Chris Spencer  
Manager, Regulatory Affairs

cc: Christopher Murray, Baffinland

<sup>1</sup> NWB (2014). NWB Renewal Licence No. 2BE-MRY1421. April 17, 2014.



☎ (867) 975-8400 1-800-667-2742 📠 (867) 979-3238 ✉ info@qia.ca 🌐 www.qia.ca 📧 @Qikiqtani\_Inuit 📺 @QikiqtaniInuit 📷 @Qikiqtani\_Inuit



ᐱᖃᖃᖃᖃᖃᖃ  
ᓄᐃᖃᖃᖃ ᐃᓄᖃᖃᖃ  
Serving the  
communities of

ᐃᖃᖃᖃᖃᖃᖃ  
Arctic Bay

ᖃᖃᖃᖃᖃᖃᖃᖃ  
Clyde River

ᐃᖃᖃᖃᖃᖃᖃ  
Grise Fiord

ᐃᖃᖃᖃᖃ  
Igloolik

ᐃᖃᖃᖃᖃᖃ  
Iqaluit

ᐃᖃᖃᖃᖃ  
Kimmirut

ᐃᖃᖃᖃᖃᖃ  
Kinngait

ᐃᖃᖃᖃᖃᖃᖃ  
Pangnirtung

ᐃᖃᖃᖃᖃᖃ  
Pond Inlet

ᖃᐃᖃᖃᖃᖃᖃᖃ  
Qikiqtarjuaq

ᖃᖃᖃᖃᖃᖃᖃᖃ  
Resolute Bay

ᖃᖃᖃᖃᖃᖃᖃ  
Sanikiluaq

ᖃᖃᖃᖃᖃ  
Sanirajak

|           |                                                                                                                                                                                                                                       |
|-----------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|           | provisions of the current Type B Water Licence restrict impacts to at least thirty-one (31) metres above the ordinary high-water mark, therefore, it is not clear if Baffinland is suggesting an alternative use for temporary camps. |
| Requests: | QIA requests that Baffinland confirm it will not construct future camps within thirty-one (31) metres of the ordinary high-water mark.                                                                                                |

|            |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
|------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>ID:</b> | <b>QIA-04</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| Reference: | Project Description                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| Comment:   | Baffinland states in section 8: "Baffinland will dispose of all drill waste, including water, chips, muds and salts (Calcium Chloride $\text{CaCl}_2$ ), from land-based drilling, in a properly constructed sump or an appropriate natural depression located at a distance of at least thirty-one (31) metres from the ordinary high-water mark of any adjacent waterbody, where direct flow into a water body is not possible and no additional impacts are created." QIA has previously expressed concerns with drill waste not being appropriately contained in a sump and instead flowing onto the surrounding land. |
| Requests:  | QIA requests that the NWB include in the Type B Water Licence the following term (Section 26(1)(g) Item 31) from the Evrim Exploration Canada Corp. Exploration Licence: "The Permittee shall not allow any Drilling Waste to spread to the surrounding lands and watercourses."                                                                                                                                                                                                                                                                                                                                           |

|            |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
|------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>ID:</b> | <b>QIA-05</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| Reference: | Project Description                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| Comment:   | Baffinland states in section 8: "Baffinland may, for the purpose of geotechnical or exploration investigations carry out drilling activities within thirty-one (31) metres of the high water mark of any water body or on ice, provided that such activities are consistent with the terms of this Licence and a request has been submitted and received by the NWB, ten (10) days in advance of drilling, that includes a thorough description of the proposed activities and the following: An appropriate scaled site map, complete with approximate GPS coordinates of planned drilling locations and the associated water bodies; Locations of waste deposition; and, Mitigation measures that are planned to be in place, prior to, during drilling and following if required to protect waters." |
| Requests:  | The proposed project area includes activities on Inuit Owned Land parcels PI-14 and PI-15. Baffinland does not currently hold a valid Land Use Permit to conduct exploration activities on either parcel. QIA requests                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |



ᕕᕕᕐᕐᕐᕐ  
ᕕᕕᕐᕐᕐᕐ ᕕᕕᕐᕐᕐ

Serving the  
communities of

ᕕᕕᕐᕐᕐᕐ  
Arctic Bay

ᕕᕕᕐᕐᕐᕐᕐ  
Clyde River

ᕕᕕᕐᕐᕐᕐ  
Grise Fiord

ᕕᕕᕐᕐ  
Igloodik

ᕕᕕᕐᕐᕐ  
Iqaluit

ᕕᕕᕐᕐ  
Kimmirut

ᕕᕕᕐᕐᕐ  
Kinngait

ᕕᕕᕐᕐᕐᕐ  
Pangnirtung

ᕕᕕᕐᕐᕐ  
Pond Inlet

ᕕᕕᕐᕐᕐᕐᕐ  
Qikiqtarjuaq

ᕕᕕᕐᕐᕐᕐ  
Resolute Bay

ᕕᕕᕐᕐᕐᕐ  
Sanikiluaq

ᕕᕕᕐᕐ  
Sanirajak

|  |                                                                                                                         |
|--|-------------------------------------------------------------------------------------------------------------------------|
|  | acknowledgement from Baffinland that a permit is required prior to any project activities occurring on PI-14 and PI-15. |
|--|-------------------------------------------------------------------------------------------------------------------------|

|                   |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
|-------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>ID:</b>        | <b>QIA-06</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| <b>Reference:</b> | Project Description                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| <b>Comment:</b>   | Baffinland states in section 8: "If the bottom of the permanently frozen ground, or permafrost, is broken through by the drill, the depth of the bottom of permafrost and location should be reported in the annual report to the Board for data management purposes." The current Licence does not require Baffinland to report if an operator drills to the bottom of permafrost. It would also be beneficial to record the depth of the active layer to inform geotechnical recommendations. |
| <b>Requests:</b>  | <ol style="list-style-type: none"> <li>1. QIA requests that Baffinland be required to report when permanently frozen ground, or permafrost, is broken through by the drill, the depth of the bottom of permafrost and location.</li> <li>2. QIA requests that Baffinland also be required to report the depth of the active layer.</li> </ol>                                                                                                                                                   |

|                   |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
|-------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>ID:</b>        | <b>QIA-07</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| <b>Reference:</b> | Project Description                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| <b>Comment:</b>   | Baffinland indicates in section 17 of the renewal application that predicted environmental impacts of the undertaking and proposed mitigation measures are the same as those considered in the existing water licence. Baffinland makes no reference to adaptive management in its delivery letter, application, or project description. Given the focus of adaptive management to mitigate environmental impacts at the Mary River Project in the recent Phase 2 regulatory process, the inclusion of objectives, indicators, thresholds, and responses would have been a positive measure to ensure consistency. |
| <b>Requests:</b>  | QIA requests that objectives, indicators, thresholds, and responses intended to mitigate environmental impacts be included in the Spills Contingency Plan and Exploration Closure and Reclamation Plan.                                                                                                                                                                                                                                                                                                                                                                                                            |

|                   |                                                                                                                                                                                                                                                                                                 |
|-------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>ID:</b>        | <b>QIA-08</b>                                                                                                                                                                                                                                                                                   |
| <b>Reference:</b> | Project Description                                                                                                                                                                                                                                                                             |
| <b>Comment:</b>   | Baffinland states in section 20 of the renewal application "Baffinland continues to consult with the North Baffin communities and organizations regarding, ongoing construction and operational activities at the Project, shipping season, progress regarding employment from the North Baffin |



ᐱᕐᕐᕐᕐᕐᕐ  
ᓄᓇᕐᕐᕐᕐ ᐃᓄᓇᕐ  
Serving the  
communities of

ᐃᖃᐱᕐᕐᕐᕐ  
Arctic Bay

ᖃᕐᕐᕐᕐᕐᕐᕐ  
Clyde River

ᕐᕐᕐᕐᕐᕐᕐ  
Grise Fiord

ᐃᕐᕐᕐᕐ  
Igloolik

ᐃᖃᕐᕐᕐ  
Iqaluit

ᕐᕐᕐᕐ  
Kimmirut

ᕐᓇᕐᕐᕐ  
Kinngait

ᕐᓇᕐᕐᕐᕐ  
Pangnirtung

ᕐᕐᕐᕐᕐᕐ  
Pond Inlet

ᖃᕐᕐᕐᕐᕐᕐᕐ  
Qikiqtarjuaq

ᖃᕐᕐᕐᕐᕐᕐ  
Resolute Bay

ᕐᕐᕐᕐᕐᕐ  
Sanikiluaq

ᕐᕐᕐᕐ  
Sanirajak

|           |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
|-----------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|           | <p>communities, environmental monitoring activities and results, exploration activities and future phases of the Project. Baffinland's senior management team continued to participate in these meetings. The QIA and NWB Annual Report for Operations details a complete list of consultations and meetings held with regulators, stakeholders, and the public by Baffinland. The renewal application states that Baffinland reports on consultation in the QIA and NWB Annual Report for Operations."</p> <p>The 2019 Type B Water Licence Annual Report refers to the 2019 Type "A" Water Licence Annual Report. Neither Annual Report provides outcomes of consultations regarding exploration activities or the areas licenced under the current Type "B" Water Licence. Furthermore, there is no list of concerns expressed and measures to address concerns.</p> |
| Requests: | QIA requests a detailed summary of consultation meetings that relate to the locations licenced under the current Type "B" Water Licence, including a list of concerns expressed and measures Baffinland proposes to address concerns.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |

| ID:        | QIA-09                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
|------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Reference: | Spill Contingency Plan                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| Comment:   | Response procedures described include the use of berms, ditches, trenches, and floating booms. A description of potential equipment that may be needed to complete these activities is not provided, except for Section 5.2 which notes a boat would be used to place booms. It is not clear if the necessary equipment for the most likely spill scenarios described in Section 8 will be available on site and located such that the identified response times can be met. |
| Requests:  | QIA requests that a list of equipment necessary to respond to the likely spill scenarios should be provided and Baffinland should indicate if this equipment will be available on site and capable of responding within the defined response times.                                                                                                                                                                                                                          |

| ID:        | QIA-10                                                                                                                                                                                                                                                                                                                                                                                                                                         |
|------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Reference: | Spill Contingency Plan                                                                                                                                                                                                                                                                                                                                                                                                                         |
| Comment:   | Section 5.4 describes wildlife protection procedures and management approach for impacted wildlife, however further details on the treatment approach for impacted wildlife are absent, as well as the reporting and adaptive management mechanisms that may be in place for wildlife incidents. It is not clear what treatment approaches could be taken, or who they would be carried out by. It is not known if certain Baffinland staff or |



ᐱᖃᖃᖃᖃᖃ  
ᓄᓄᖃᖃᖃ ᐃᓄᖃᖃᖃ  
Serving the  
communities of

ᐃᖃᖃᖃᖃᖃᖃ  
Arctic Bay

ᖃᖃᖃᖃᖃᖃᖃᖃ  
Clyde River

ᐃᖃᖃᖃᖃᖃᖃ  
Grise Fiord

ᐃᖃᖃᖃᖃ  
Igloolik

ᐃᖃᖃᖃᖃᖃ  
Iqaluit

ᐃᖃᖃᖃᖃ  
Kimmirut

ᐃᖃᖃᖃᖃᖃ  
Kinngait

ᐃᖃᖃᖃᖃᖃᖃ  
Pangnirtung

ᐃᖃᖃᖃᖃᖃᖃ  
Pond Inlet

ᖃᐃᖃᖃᖃᖃᖃᖃ  
Qikiqtarjuaq

ᖃᖃᖃᖃᖃᖃᖃᖃ  
Resolute Bay

ᖃᖃᖃᖃᖃᖃᖃ  
Sanikiluaq

ᖃᖃᖃᖃᖃ  
Sanirajak

|           |                                                                                                                                                                                                                                                                                                                                                                                                |
|-----------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|           | onsite contractors are qualified to handle and rehabilitate wildlife or euthanize, as necessary.                                                                                                                                                                                                                                                                                               |
| Requests: | QIA requests that the approach to impacted wildlife management be further defined and that the party conducting such action be identified. Reference to the project's available wildlife management and protection plan should also be provided to indicate how wildlife incidents are properly reported to relevant authorities and what mitigative responses may be implemented as a result. |

|            |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
|------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>ID:</b> | <b>QIA-11</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| Reference: | Spill Contingency Plan                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| Comment:   | The plan identifies that other hazardous materials, chemicals or wastes besides fuel, lubricants and oils will be present but does not identify approximate quantities (although types are listed in Appendix E), nor does it identify the likely spill scenarios and responses to be implemented. The plan notes that small volumes will limit the magnitude of spills that can occur. Nevertheless, a spill risk is potentially still present and should be further identified with appropriate responses for the contingency plan to be considered complete with regards to all types of spills that may occur. |
| Requests:  | QIA requests that the approximate quantities of hazardous materials on site be identified, as well as an analysis of the most likely spill scenario and responses.                                                                                                                                                                                                                                                                                                                                                                                                                                                 |

|            |                                                                                                                                                                                                                                                                                      |
|------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>ID:</b> | <b>QIA-12</b>                                                                                                                                                                                                                                                                        |
| Reference: | Spill Contingency Plan                                                                                                                                                                                                                                                               |
| Comment:   | The plan identifies the potential for spills of untreated sewage but does not identify approximate quantities, nor does it identify a likely spill scenario and responses to be implemented. A spill analysis should be included for the contingency plan to be considered complete. |
| Requests:  | QIA requests the approximate quantities of sewage generated onsite as well as an analysis of the most likely spill scenario and responses.                                                                                                                                           |

|            |                                                                                                                                                                                                                                                                                                                                                                                |
|------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>ID:</b> | <b>QIA-13</b>                                                                                                                                                                                                                                                                                                                                                                  |
| Reference: | Spill Contingency Plan                                                                                                                                                                                                                                                                                                                                                         |
| Comment:   | Section 8.2 indicates sewage is to be disposed of in a latrine system, and greywater in a sump (if not directed to a sewage treatment facility) at a minimum distance of 31 m from water bodies. The 31 m distance was earlier identified as being consistent with the document "Design Rationale for Fuel Storage and Distribution Facilities" 3rd Edition 2006, published by |



Sanirajak

|            |                                          |
|------------|------------------------------------------|
| ID:        | QIA-17                                   |
| Reference: | Exploration Closure and Reclamation Plan |



Sanirajak

|                   |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
|-------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>ID:</b>        | <b>QIA-19</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| <b>Reference:</b> | Exploration Closure and Reclamation Plan                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| <b>Comment:</b>   | For details regarding engagement, readers are referred to the Interim Closure and Reclamation Plan for the Mary River Project. This may not be consistent with the Water Licence conditions. In addition, the MVLWB Guidelines for Closure and Reclamation of Advanced Mineral Exploration and Mine Sites specify the inclusion of a record of engagement, as well as lessons learned from other projects and reclamation research plans that are to occur and which will support closure and reclamation of the site. These items are all absent from the Exploration Closure and Reclamation Plan. |



ᕈᕈᕐᕐᕐ  
ᕈᕈᕐᕐᕐ ᕈᕈᕐᕐᕐ  
Serving the  
communities of

ᕈᕈᕐᕐᕐ  
Arctic Bay

ᕈᕈᕐᕐᕐ  
Clyde River

ᕈᕈᕐᕐᕐ  
Grise Fiord

ᕈᕈᕐᕐᕐ  
Igloolik

ᕈᕈᕐᕐᕐ  
Iqaluit

ᕈᕈᕐᕐᕐ  
Kimmirut

ᕈᕈᕐᕐᕐ  
Kinngait

ᕈᕈᕐᕐᕐ  
Pangnirtung

ᕈᕈᕐᕐᕐ  
Pond Inlet

ᕈᕈᕐᕐᕐ  
Qikiqtarjuaq

ᕈᕈᕐᕐᕐ  
Resolute Bay

ᕈᕈᕐᕐᕐ  
Sanikiluaq

ᕈᕈᕐᕐᕐ  
Sanirajak

|           |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
|-----------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Requests: | <ol style="list-style-type: none"> <li>1. Provide a record of engagement specific to closure that has occurred that includes any issues identified by the engaged parties and how the company has addressed them or modified the project in response.</li> <li>2. Provide a summary of applicable lessons learned from other projects that can be applied to the exploration project.</li> <li>3. Provide details of any reclamation research plans completed, in progress or proposed that will address uncertainties and support closure planning of the exploration sites.</li> </ol> |
|-----------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

|            |                                                                                                                                    |
|------------|------------------------------------------------------------------------------------------------------------------------------------|
| <b>ID:</b> | <b>QIA-20</b>                                                                                                                      |
| Reference: | Exploration Closure and Reclamation Plan                                                                                           |
| Comment:   | The location and number of proposed drill sites is not provided.                                                                   |
| Requests:  | QIA requests a summary of the anticipated drilling program, including anticipated number of sites and proposed locations on a map. |

|            |                                                                                                                                    |
|------------|------------------------------------------------------------------------------------------------------------------------------------|
| <b>ID:</b> | <b>QIA-21</b>                                                                                                                      |
| Reference: | Exploration Closure and Reclamation Plan                                                                                           |
| Comment:   | The closure plan specifies disturbed areas are to be graded and scarified, but the total area of the disturbed areas is unclear.   |
| Requests:  | QIA requests additional detail regarding the areas of each drill site and campsite as well as detailed maps delineating each area. |

|            |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
|------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>ID:</b> | <b>QIA-22</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| Reference: | Exploration Closure and Reclamation Plan                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| Comment:   | Details regarding the expected mobilization/demobilization requirements during reclamation are not provided. It is not clear how the exploration camps and drill sites will be accessed during construction, operation, and closure, either by winter road, helicopter, or boat. It is stated in Section 5 of the closure plan that transport of materials and equipment at closure will occur via helicopter or overland by cat train during the late winter period to Mary River Site, Milne Port or Steensby. However, should a cat train be used, it is not clear if this requires construction of a winter road. |
| Requests:  | <ol style="list-style-type: none"> <li>1. QIA requests a description of how the sites are accessed, and how materials and equipment are to be mobilized/demobilized during closure, including the requirement for any winter road.</li> <li>2. QIA further request additional detail regarding the requirements for personnel, equipment, fuel, accommodations, flights, etc.</li> </ol>                                                                                                                                                                                                                              |



ᐃᖃᖃᖃᖃᖃᖃᖃ  
ᓄᓇᖃᖃᖃᖃᖃᖃᖃ

Serving the  
communities of

ᐃᖃᖃᖃᖃᖃᖃᖃ  
Arctic Bay

ᖃᖃᖃᖃᖃᖃᖃᖃᖃ  
Clyde River

ᐃᖃᖃᖃᖃᖃᖃᖃ  
Grise Fiord

ᐃᖃᖃᖃᖃᖃ  
Igloolik

ᐃᖃᖃᖃᖃᖃᖃ  
Iqaluit

ᐃᖃᖃᖃᖃᖃ  
Kimmirut

ᐃᖃᖃᖃᖃᖃ  
Kinngait

ᐃᖃᖃᖃᖃᖃᖃᖃ  
Pangnirtung

ᐃᖃᖃᖃᖃᖃᖃᖃ  
Pond Inlet

ᐃᖃᖃᖃᖃᖃᖃᖃᖃ  
Qikiqtarjuaq

ᐃᖃᖃᖃᖃᖃᖃᖃᖃ  
Resolute Bay

ᐃᖃᖃᖃᖃᖃᖃᖃᖃ  
Sanikiluaq

ᐃᖃᖃᖃᖃᖃᖃᖃ  
Sanirajak

| ID:        | QIA-23                                                                                                                                                                                            |
|------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Reference: | Exploration Closure and Reclamation Plan                                                                                                                                                          |
| Comment:   | Section 5.2.3 states contaminated soils will be removed from the exploration site, however the approximate quantity of impacted soil that may be generated from the exploration sites is unclear. |
| Requests:  | QIA requests that an estimated volume of impacted soil be provided and itemized by site. This volume can be further refined following the completion of Phase I ESA's prior to closure.           |

| ID:        | QIA-24                                                                                                                                                                                                                                                                                                                                                                 |
|------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Reference: | Exploration Closure and Reclamation Plan                                                                                                                                                                                                                                                                                                                               |
| Comment:   | The closure plan indicates sumps will be used for disposal of greywater. It is not clear how sewage will be managed.                                                                                                                                                                                                                                                   |
| Requests:  | <ol style="list-style-type: none"> <li>1. QIA requests additional detail regarding the number of sumps and estimated volume of sewage.</li> <li>2. Provide the location and design of sumps, and any applicable standards/guidelines they are to conform to with regards to design, operation, and closure.</li> <li>3. Detail sewage management practices.</li> </ol> |

| ID:        | QIA-25                                                                                                        |
|------------|---------------------------------------------------------------------------------------------------------------|
| Reference: | Exploration Closure and Reclamation Plan                                                                      |
| Comment:   | The closure plan indicates structures, equipment, water lines, waste, etc. are all to be removed from site.   |
| Requests:  | QIA requests that the quantity of materials and waste to be removed from site be provided in a summary table. |