



Field Operations Division
Nunavut Regional Office
PO Box 2200
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5 September 2014

Zoë Pratt
Adamera Minerals Corp.
Suite 1100 - 1111 Melville Street
Vancouver, BC
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RE: Hazardous Waste from Diamonds North/Adamera Minerals Corp. in Kugaaruk Landfill/Metals Dump

Dear Ms. Pratt,

On August 20 2014 I conducted an inspection in the community of Kugaaruk. During the course of the inspection, I observed that a large quantity of fuel barrels belonging to Diamonds North (now Adamera Minerals Corp.) have been deposited in the community's metals dump. A significant portion of these barrels are full and their deposit in this facility is unauthorized, both under Diamonds North/Adamera's licence and under the community's. As per Diamonds North/Adamera's expired licence 2BE-PEL0813 (Amaruk Project), Part D Item 5: *"The Licensee shall backhaul and dispose of all hazardous wastes, waste oil and non-combustible waste generated through the course of the operation in an approved waste disposal site."* Any unauthorized deposit of waste in the territory is a contravention of the *Nunavut Waters and Nunavut Surface Rights Tribunal Act, 2002*. Furthermore, hazardous waste can only be received by a *licensed* receiver for hazardous waste. The communities are not approved receivers of hazardous waste.

The issue of unlicensed deposit of hazardous waste is exacerbated by the fact that the barrels are stored in an un-lined area, and in fact they are in contact with a creek that flows only a short distance to the ocean. At this time I did not find any barrels leaking, however their careless storage means that any spills may quickly become multi-jurisdictional challenges.

I have a copy (attached) of the 2008 agreement with the Hamlet which authorizes only non-combustible solid waste and incinerator ash. The agreement specifically excludes leaving barrels in the landfill. As such, **I require that all barrels, full or empty, belonging to and/or marked with "Diamonds North" be immediately removed from the community by Adamera and deposited in an appropriate, licensed facility.** I noted several empty barrels scattered through the metals dump; please ensure these are included. There are also a large number of crushed barrels on a liner that I am told were authorized for deposit by the Hamlet. Please produce a copy of the agreement from the hamlet for this deposit, or remove the crushed barrels also.



This is to be carried out by **September 30, 2014** and confirmation of this provided to me. Failure to do so will result in the issuance of a Direction under s.87 of the *Nunavut Waters and Nunavut Surface Rights Tribunal Act, 2002*. Should you have any questions on this matter, please do not hesitate to contact me. My coordinates are provided below.

Eva Paul

Water Resources Officer | Agent des ressources en eau

Aboriginal Affairs and Northern Development Canada | Affaires autochtones et Développement du Nord Canada

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Attachments: 1. Landfill Agreement 2008
2. Photos of August 20 2014 Inspection

CC: Phyllis Beaulieu, Manager of Licensing, NWB
Erik Allain, Manager of Field Operations, AANDC
Gordon Dinney, Interim SAO, Hamlet of Kugaaruk