



P.O. Box 360 Kugluktuk, NU X0B 0E0 Telephone: (867) 982-3310 Fax: (867) 982-3311 www.kitia.ca

September 30, 2011

Kugluktuk <sup>5</sup>d<sup>5</sup>2<sup>56</sup>

Bathurst Inlet Kingaok 5000,000

Bay Chimo Umingmaktok ▷୮∿Lీɔ̀ऽ⁵ь

Cambridge Bay Ikaluktutiak △⁵b⇒⁵⊃°∩⊲⁵⁵

Gjoa Haven Okhoktok

Taloyoak

Kugaaruk dÜ<sup>s</sup>√b Dionne Filiatrault Executive Director Nunavut Water Board P.O Box 119 Gioa Haven, NT X0B 1J0

## Re: 2BM-ULU0914 Interim and Abandonment and Restoration Plan

Via email: dionne@nunavutwaterboard.org and licensing@nunavutwaterboard.org

Dear Ms. Filiatrault:

On August 31, 2011 the Nunavut Water Board (the Board) asked interested parties to make representations to the Board on the submission by Elgin Mining Inc. of its Interim Abandonment and Restoration Plan, by September 30, 2011. KIA comments are provided below:

- Section 3.1 (and elsewhere in the Interim Plan) Is underground disposal a viable option at Ulu?
- Section 3.1 Although KIA is not opposed to underground disposal, KIA will currently reserve comment, as we would like to see a protocol for screening of materials for underground disposal.
- Open Burning KIA supports open burning of untreated and/or uncontaminated lumber, however proper procedures must be followed when disposing of contaminated waste and other materials. Comments provided by Environment Canada (Paula C. Smith, September 23, 2011) are an excellent source of information.
- Section 3.4 Can Elgin provide a timeframe for an updated assessment on PAG/ML at Ulu?

The KIA would like to thank the NWB for the opportunity to comment on this file. Please feel free to contact us if you have any questions.

Sincerely,

Luigi Torretti Senior Environment Officer KIA Lands & Environment