



Nunavut Regional Office
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Your file - Votre référence

8BC-MEA

Our file - Notre référence

July 17th, 2007

IQA-N 9545-2-2MEAG/ CIDMS 156366

Phyllis Beaulieu
Licensing Administrator
Nunavut Water Board
P.O. Box 119
Gjoa Haven, NU, X0A 1J0

Re: Baker Lake Tank Farm and Marshalling Area - Meadowbank Project

Indian and Northern Affairs Canada (INAC) reviewed the Baker Lake Tank Farm and Marshalling Area application submitted by Meadowbank Mining Corporation. In conducting our review INAC has considered all information presented on the Nunavut Water Board's FTP-site under the file name 8BC-MEA.

Section 3.7 of the Water Use and Management Plan states "*baseline water quality for surface flow at the marshalling area was not know at the time of writing the report*". INAC request to know if baseline water quality data has since been presented and when the proponent intends on submitting such data for the public record.

Section 7.2.1 of the Water Use and Management Plan notes that monitoring locations in the ponds will be marked by a highly visible stake that will determine the exact location of the collection point. INAC suggests the sampling locations be selected in concert with the INAC Inspector. Furthermore, the proponent should list the approximate location and number of sample sites for this application. Such information is best presented visually, in the form of a site specific monitoring map. This information will ensure appropriate Surveillance Network Program sites are written into the licence.

Table 11 of the Water Use and Management Plan presents water quality guidelines for regular monitoring parameters, listed are total suspended solids, oil/grease and ammonia. The Water Use and Management Plan suggests the above mentioned parameters for monitoring based on site activities. INAC suggests the proponent sample for a broader range of parameters, akin to the parameters the INAC Inspector will collect. These parameters include; routine, metals (total and dissolved), ICP Metal Scan and nutrients. Collecting samples for a broader range of parameters certainly adds an element of complexity and cost to the proponent. Given the value of the final receiving water body, Baker Lake, INAC would prefer the proponent collect data that may demonstrate other forms of water quality impacts.

With respect to the Baker Lake Fuel Tank Farm Geotechnical Detail Design Report, INAC requests the proponent be required to submit a Operations and Maintenance Plan, Spill

Contingency Plan, Abandonment and Restoration Plan and a finalized Site Water Management Plan. These plans should be developed to encompass all infrastructure associated with this application.

INAC recognizes the importance of preliminary development in the creation of a large project such as Meadowbank. However, INAC is increasingly concerned with proponents holding multiple water licences in a common geographical area for the purpose of a much larger project. Currently, two Type B licences exist for the Meadowbank project; 3BC-TEH0707 and 8BC-TEH0708. Additionally, 3BC-TEH0707 also has a relationship to the Hamlet of Baker Lake (previous licence NWB3BAK9904) for waste and sewage disposal. Thus, the 8BC-MEA application represents the third Type B water licence for a Meadowbank project component.

Based on the number of licences currently related to the Meadowbank project and the absence of an all encompassing Type A application, INAC is directing the NWB to call a hearing for the 8BC-MEA application. The intent of this hearing is to clearly delineate the process and time lines regarding how the proponent intends to incorporate all of their Type B licences into one comprehensive Type A licence. Furthermore, INAC would like to remind the NWB and the proponent to clearly communicate all future plans regarding the water licensing of the Meadowbank project with reviewers. Proactive communication amongst all parties plays a large role in improving the pace and quality of reviewing licence applications.

Should you have any questions or comments, please do not hesitate to contact me at (867) 975-4548 or by email at BathoryS@inac.gc.ca

Sincerely,

Stephen Bathory
Regional Coordinator