



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

Your file - Votre référence
1BH-IBF1819
Our file - Notre référence
CIDM#1244740

March 18, 2019

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 Inukshuk Construction Ltd. Application for Amendment and Renewal of Water Licence No. 1BH-IBF1819 – Additional Water Source.

Dear Mr. Dwyer,

Thank you for the February 18, 2019 invitation for Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC) to comment on the application submitted by Inukshuk Construction Ltd. to amend and renew Water Licence No. 1BH-IBF1819, issued for the purpose of hydrostatic testing at the Quilliq Energy Corporation (QEC) Iqaluit Bulk Fuel Storage Farm. The amendment seeks to add a water source from snow meltwater and renew the licence to May 2020. CIRNAC examined the submission and the following comments have been provided pursuant to CIRNAC's mandated responsibilities under the *Nunavut Waters and Nunavut Surface Rights Tribunal Act* and the *Department of Indian Affairs and Northern Development Act*.

1. Management Plans for Water Discharge and Sedimentation Control

References:

- Information Request Applicant Response, e-mail correspondence between David Baines of the Nunavut Water Board and Maurice Guimond of Quilliq Energy Corporation, Feb 8, 2019.

It is unclear from the e-mail correspondence where the hydrostatic test water from the storage tanks will be released to the environment. Mr. Guimond suggests in the e-mail that the water will be discharged to the same source from which it was taken, as per Fisheries and Oceans Canada recommendations. Contamination is not a concern, though erosion



and sediment control in Lake Geraldine may be a concern if 6 million litres of water are released back to the land via a small diameter pipe or hose, rather than directly to Lake Geraldine.

Recommendation:

CIRNAC recommends that QEC clearly state their planned location and method for releasing hydrostatic discharge water. Specific erosion mitigations, such as discharge flow rates, should be detailed.

2. Clarification on Continued Use of Pond Sources

References:

- Application for Water Licence Amendment, written by Marc Losier on behalf of Inukshuk Construction Ltd., November 13, 2018.

The application document describes meltwater as an alternate source of water for use. However, it is also suggested in the application document that meltwater will replace the currently approved ponds entirely to supply the 6 million litres required to fill the storage tanks. Therefore it is unclear whether the ponds will continue to be used.

Recommendation:

CIRNAC recommends that Inukshuk Construction Ltd. clarify whether the ponds will continue to be used as water sources, and under which circumstances.

If there are any questions or concerns surrounding the above comments, please contact me at (867) 975-4282 or bridget.campbell@canada.ca or Godwin Okonkwo at (867) 975-4550 or email godwin.okonkwo@canada.ca.

Sincerely,

Bridget Campbell,
Water Resource Coordinator

CC: Marc Losier, Mosher Engineering Ltd. on behalf of Inukshuk Construction Ltd.