



Our reference
IQALUIT-#702528

August 1, 2013

Your reference
1BR-DPI1217

Phyllis Beaulieu
Manager of Licensing
Nunavut Water Board
Gjoa Haven, NU X0E 1J0

**Re: Water Licence #1BR-DPI1217 – FOX-E Durban and Padloping Islands
Remediation Project – Aboriginal Affairs and Northern Development
Canada – Qikiqtani Region**

Addendum to water licence amendment application #1

Dear Ms. Beaulieu,

Thank you for your email of July 23, 2013, concerning the above-mentioned water licence amendment application. A memorandum is provided for the Board's consideration. Comments have been provided pursuant to the Department's mandated responsibilities under the *Nunavut Waters and Nunavut Surface Rights Tribunal Act* and the *Department of Indian Affairs and Northern Development Act*.

Please do not hesitate to contact me by telephone at 867-975-4555 or email at david.abernethy@aandc-aadnc.gc.ca for further information.

Regards,

David Abernethy
Regional Coordinator
Water Resources Division
Resource Management Directorate
Aboriginal Affairs and Northern Development Canada
Iqaluit, NU X0A 0H0

Encl.

c.c.: Murray Ball, Manager of Water Resources, AANDC, Iqaluit, Nunavut

Memorandum

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|----------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------|
| TO | Phyllis Beaulieu Manager of Licensing Nunavut Water Board | OUR REFERENCE IQALUIT-#702528 |
| FROM | David Abernethy Water Resources Regional Coordinator Aboriginal Affairs and Northern Development Canada | YOUR REFERENCE 1BR-DPI1217 DATE August 1, 2013 |
| SUBJECT | Licence #1BR-DPI1217 – FOX-E Durban and Padloping Islands Remediation Project – Aboriginal Affairs and Northern Development Canada – Qikiqtani Region Addendum to licence amendment application #1 | |

A. BACKGROUND

On July 23, 2013, the Nunavut Water Board (the “NWB” or “Board”) distributed an addendum to Aboriginal Affairs and Northern Development Canada’s (the “Proponent”), first application to amend the FOX-E Durban and Padloping Islands Remediation Project’s Type ‘B’ industrial water licence, #1BR-DPI1217. The original amendment application was distributed to interested parties on April 4, 2013 for a 30 day comment period. The Proponent is requesting the following changes to licence conditions:

1. Change the Padloping Island camp water source from a freshwater lake to a nearby stream. Licence condition: Part C, Item 1.
2. Remove the requirement to analyze the geochemistry of borrow material prior to use for construction purposes. Licence condition: Part D, Item 16; and,
3. Remove the requirement to install monitoring wells at land farm treatment facilities. Licence condition: Part K, Item 2.

The submitted addendum comprises of the following documentation:

1. AECOM Canada Ltd. *Subject: Durban Island and Padloping Island Borrow Source Geochemistry*. Memo from Cathy Corrigan of AECOM Canada Ltd. to Matthew McElwaine of Public Works and Government Services Canada. Project #60214959. January 14, 2013;

2. AECOM Canada Ltd. *Subject: Durban Island and Padloping Island – NWB Condition for the Provision of Landfarm Monitoring Wells*. Memo from B. Fedorak of AECOM Canada Ltd. to Stephen Hooey of Aboriginal Affairs and Northern Development Canada. Project #60214959. July 17, 2013.
3. Aboriginal Affairs and Northern Development Canada. *Summary – Amendment Application, Durban and Padloping Island, 1BR-DPI1217*. July 17, 2013; and,
 - Included in January 14, 2013 and July 17, 2013 AECOM Canada Ltd. memos.
4. Photo of potential Padloping Island water source.

The NWB has asked interested parties to provide comments by August 1, 2013.

B. RESULTS OF REVIEW

The following comments/ recommendations are submitted for the Board's consideration.

1. Change to the Padloping Island Camp's freshwater source

There should be no issue in changing the freshwater source to a nearby stream. Water usage will be minimal (less than 4.0 m³ per day) and the licence includes provisions to prevent the drawdown of source water bodies (Part C, Item 4).

2. Not performing additional analysis of borrow source geochemistry

The submitted January 14, 2013 AECOM Canada Ltd. memo adequately explains that there is no reason to expect acid rock drainage conditions at project borrow sources. For this reason, it is not necessary to test borrow material for acid-base accounting or metal leaching potential.

3. Not installing monitoring wells at land farm treatment facilities

The submitted July 17, 2013 AECOM Canada Ltd. memo adequately explains that analysing groundwater in the vicinity of the land farm treatment areas is not necessary. The Abandoned Military Site Remediation Protocol, which the Proponent is adhering to for this site remediation project, does not require this type of monitoring program and the land farms will be temporary (one or two years). However, a soil sampling program has been implemented to monitor the treatment of hydrocarbon impacted soils. The Proponent has committed to install

monitoring wells if land farm treatment operations continue for more than two years. This is an acceptable approach.

Prepared by David Abernethy