



**Environment Environnement  
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Our file: 4703 001 015

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**RE: NWB 2BB-MEA – Cumberland Resources Ltd. – Meadowbank Project Amendment**

On behalf of Environment Canada (EC), I have reviewed the information submitted with the above-mentioned application. The following specialist advice has been provided pursuant to Environment Canada's mandated responsibilities for the enforcement of the *Canadian Environmental Protection Act*, Section 36(3) of the *Fisheries Act*, the *Migratory Birds Convention Act*, and the *Species at Risk Act*.

Cumberland Resources Ltd. is proposing to amend their current water license to allow for the construction of a 5,600,000 L fuel tank for the storage of diesel fuel at the Meadowbank Project. The new fuel tank will allow for the consolidation of 8 existing fuel vaults (4 50,000 L tanks and 4 75,000 L tanks). The tank will be located in a bermed and lined containment facility with an associated dispensing unit located within a lined dispensing pad. The function of the dispensing unit will be to both fill the 5.6 million litre tank as well as to dispense fuel as required. The facility is designed to meet the following standards:

- As a general guideline the fuel facility will meet the GN standard "Design Rationale for Fuel Storage & Distribution Facilities 1998".
- National Fire Code 1995
- Proposed Federal Petroleum Products and Allied Petroleum Products Storage Tank System Regulations – 2003
- Canadian Council of Ministers of the Environment "Environmental Code of Practice of Aboveground Storage Tank Systems Containing Petroleum Products – 1994"

Once the new 5.6 M L facility is operational, the multiple smaller tanks will be decommissioned. The proposal includes the construction of a 625 m access road to the fuel vault and dispensing area. This proposal was screened by the Nunavut Impact Review Board in 2004 and approved subject to terms and conditions. Cumberland Resources is proposing to carry out the work this summer.

Environment Canada recommends that the following conditions be applied throughout all stages of the project:

- Drawing 3000-C-203 "Tank Farm Excavation Plan and Sections" details the areas that will require excavation and the removal of overburden during construction of the fuel storage and dispensing facility. Environment Canada recommends that the proponent store the removed overburden in such a manner as to prevent erosion and sedimentation of any surrounding waterbodies.



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- Environment Canada provided comments on the Fuel Storage and Management Plan to the Nunavut Water Board on October 24, 2005 regarding spill prevention, preparedness, response and recovery. Environment Canada recommends that the proponent revise the current Plan, taking into consideration the recommendations made by Environment Canada in 2005.
- Cumberland Resources Ltd. should ensure that appropriate and adequate spill response equipment is located at the new storage tank and related dispensing facility.
- The Abandonment and Reclamation Plan included with the amendment does not include plans for the removal of the impervious liner in the new fuel storage facility. Further, the Plan makes no mention of the remediation of contaminated soils that may be required as a result of fuel spills. While any spills will likely be contained within the facility, the soil inside the containment area will likely require some sort of treatment prior to closure. The Plan should be revised to include address these items.
- The Abandonment and Restoration Plan states that monitoring will occur for two years post-closure. Environment Canada reminds the proponent that the proposed two-year monitoring program would only apply to the closure of the exploration camp, and that monitoring requirements would likely be extended should the project enter full mining operations.
- The application documents do not seem to provide any details regarding plans for the decommissioning of the 8 existing fuel vaults currently in use at the Meadowbank Project. Environment Canada requests that this information be submitted for review prior to the decommissioning of these tanks.

If there are any changes in the proposed project, EC should be notified, as further review may be necessary. Please do not hesitate to contact me with any questions or comments with regards to the foregoing at (867) 975-4639 or by email at [colette.spagnuolo@ec.gc.ca](mailto:colette.spagnuolo@ec.gc.ca).

Yours truly,

***Original signed by***

Colette Spagnuolo  
Environmental Assessment / Contaminated Sites Specialist

cc: (Stephen Harbicht, Head, EA North, Environment Canada, Yellowknife)