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Your file - Votre référence  
2BE-JAC0406

Our file - Notre référence  
#80920 / 9545-3-2JACG

May 25, 2006

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Via Email

**Re: 2BE-JAC0406 - Twin Mining Corporation - Jackson Inlet Project - 2005 Annual Report**

On behalf of Indian and Northern Affairs Canada (INAC) I have reviewed the above-mentioned application. The following specialist advice has been provided pursuant to INAC's mandated responsibilities for the enforcement of the *Nunavut Waters and Nunavut Surface Rights Tribunal Act* (NW&NSRT), *Arctic Waters Pollution Prevention Act* (AWPPA), and the *Department of Indian Affairs and Northern Development Act* (DIAND Act).

Background Information

Twin Mining Corp. has submitted an Annual Report of water use and disposal of waste associated with Jackson Inlet Project in 2005. This project is situated 110 km west northwest of Arctic Bay on the Brodeur Peninsula, having a general coordinate of 73°16'36"N, 88°16'16"W. Project personnel are accommodated in a field camp which has a coordinate of 73°16'32"N, 88°16'16"W. The project's licence permits the consumption of 60 m<sup>3</sup> of freshwater per day from local sources. Of this amount, 10 m<sup>3</sup> are allotted for domestic purposes and 50 m<sup>3</sup> is used to support diamond drilling operations.

The 2005 Annual Report indicates that water consumption was within the limits established by the licence. No revisions were made to the project's Spill Contingency and Abandonment and Reclamation (A&R Plans) and no hazardous material spills were reported.

Under an agreement in 2004, Twin Mining Corp. transferred mineral claim holdings to Kennecott Canada Exploration Inc. Twin Mining Corp. conducts soil sampling, geological, and geophysical surveys on its remaining acreage. Drilling on Twin Mining's mineral claims is performed under the direction of Kennecott who is responsible for providing the Board with spill contingency provisions.

## INAC Comments

INAC recommends that the following comments be taken into consideration when reviewing the Jackson Inlet Project's 2005 Annual Report.

### SPILL CONTINGENCY / HAZARDOUS MATERIALS

- It is recommended that the project's Spill Contingency Plan be revised to properly reflect current project conditions. The submitted Plan is applicable to the proponent's 2004 exploration program.
- The proponent shall ensure that its Spill Contingency Plan complies with the conditions outlined in Part G of the project's licence. In particular, the Plan should include:
  - The name and 24-hour contact information of the person on site who is responsible in the event of a spill.
  - The name and 24-hour contact information of the Kennecott representative responsible for providing the spill response information.
  - A description of the contents of the spill kits available for use.
  - Up-to-date Material Safety Data Sheet information for all petroleum and chemical products associated with the camp operations and drilling operations.
- The contact number for the 24-Hour Spill Report Line indicated in the Plan is incorrect. The correct number is (867) 920-8130, i.e., change the area code.
- All fuel caches shall be located above the high water mark of any water body. Furthermore, INAC recommends the use of secondary containment, such as self-supporting insta-berms, when storing barreled fuel on location rather than relying on natural depressions.
- The proponent shall ensure that any hazardous materials, including waste oil, receive proper treatment and disposal at an approved treatment facility.
- Drip pans, or other similar preventative measures, shall be used when refuelling equipment on-site.

### ABANDONMENT AND RECLAMATION

- It is recommended that the project's A&R Plan be revised to properly reflect the project's current status. This Plan has been written for the proponent's 2004 exploration program.
- The 2005 Annual Report indicates that non-combustible waste was either buried at camp and/or disposed of at the Arctic Bay community waste disposal site. It is recommended that the proponent notify the Board of what types of non-combustible wastes were buried on-site. The project's licence states that no on-site land filling of domestic waste is permitted. Non-combustible waste generated through project activities are to be backhauled and disposed of in an approved waste disposal site (refer to NWB2JAC0406, Part D, Items 2 and 3). If the proponent is burying ashes, it is recommended that all ashes be raked to remove non-combustible wastes (e.g., tinfoil and iron nails) prior to disposal.

If there are any changes in the proposed project, INAC should be notified, as further review may be necessary. Please do not hesitate to contact me if you have any questions or comments with regards to the foregoing by telephone (867) 975-4555 or by email via [abernethyd@inac-ainc.gc.ca](mailto:abernethyd@inac-ainc.gc.ca).

Sincerely,

**Original signed by**

David W. Abernethy  
Water Resources Coordinator

cc. Jim Rogers - Manager of Water Resources, Indian and Northern Affairs Canada, Iqaluit

