From: Rein Lehari
To: dts@nunavutwaterboard.org; "Phyllis Beaulieu"; "Melissa Joy"
Subject: RE: Silvermet"s Muskox Camp (2BE-MSX)
Date: Wednesday, May 02, 2012 9:50:18 AM

Dear All

Part F Item 3 covers the circumstances where artesian flows have been encountered and requires capping to prevent contamination of surface waters (my understanding is that this is the industry standard). If there are no such flows, then the capping would not be required and Part I Item 9 is redundant on this point.

I will assume that further review is being undertaken and you will advise me of the outcome.

Best regards

Rein

From: David Hohnstein [mailto:dts@nunavutwaterboard.org]
Sent: May-02-12 10:40 AM
To: 'Phyllis Beaulieu'; 'Rein Lehari'; 'Melissa Joy'
Subject: RE: Silvermet's Muskox Camp (2BE-MSX)

Rein (Phyllis and Melissa),
I had a quick look at the licence conditions under MSX0712. I do not know if the condition referred to, Part I, Item 9 has been complied with by other licensees in the past, however this has been a standard condition in all exploration licences issued. This condition definitely goes beyond that of Part F, Item 3 which deals strictly with drill holes that have encountered artesian flows. If this condition is either impractical or cannot be complied with as written, an amendment should be applied for and the NWB/regulators should consider changes to this practice in the future. I have not had an opportunity to research practices in other jurisdictions at this time.

Regards,
David Hohnstein
Director Technical Services
Nunavut Water Board

From: Phyllis Beaulieu [mailto:licensing@nunavutwaterboard.org]
Sent: Monday, April 30, 2012 2:26 PM
To: 'Rein Lehari'; 'Melissa Joy'
Cc: David Hohnstein
Subject: RE: Silvermet's Muskox Camp (2BE-MSX)

Your query is being forwarded to our Director of Technical services for a response.
Regards

From: Rein Lehari [mailto:rlehari@silvermet.ca]
Sent: Wednesday, April 18, 2012 8:17 AM

To: 'Melissa Joy'
Cc: 'Phyllis Beaulieu'
Subject: RE: Silvermet's Muskox Camp (2BE-MSX)

Dear Melissa and Phyllis

Have you had a chance to consider the comment of Aurora Geosciences re the plugging of drill holes? If the holes do need to be plugged, then we would have to go into the field with concrete and place a concrete patch on the ground at each hole.

Rein

From: Rein Lehari [mailto:rlehari@silvermet.ca]
Sent: April-13-12 4:44 PM
To: 'Melissa Joy'
Cc: 'Phyllis Beaulieu'
Subject: RE: Silvermet's Muskox Camp (2BE-MSX)

Dear Melissa

I am waiting for confirmation from Kikiak on their timing and will get back to you as soon as I have it.

You pointed me to Part I, Paragraph 9, which indicates that reclamation of drill holes must include removal of any casing materials and the capping of holes with a permanent seal.

There were 26 drill holes. Of these, rods and casings were removed from23. In the case of 3 holes, some rods were lost or some casing could not be removed.

In all cases, the holes were left unplugged.

Gary Vivian of Aurora Geosciences sent me the following note:

No materials left in hole means that casing and drill rods were all removed. The only time a "plug" is required is when the hole allows ground water to seep out of it and you have to cap the hole with concrete, essentially plugging the hole. No casing or rods were left to stick up above the collar.
Could you help me reconcile these comments.
Best regards
Rein

From: Melissa Joy [mailto:Melissa.Joy@aandc-aadnc.gc.ca]
Sent: April-12-12 5:41 PM
To: Rein Lehari
Cc: Phyllis Beaulieu
Subject: Re: Silvermet's Muskox Camp (2BE-MSX)

Dear Rein,

I have had a chance to review your proposed plan and have several comments for incorporation:

-No actual date was set to meet outstanding requirements: Would **July 31/12** be an agreeable date for completion of site cleanups (ie. item #4 of your Plan), outstanding administrative requirements (ie. annual reports) and final reporting of reclamation activities (as per Part B, item 2 iv) of the water licence?

-For item #3, you refer to the "site" -you need to be more specific: which site(s) and gps location(s) were fuel drums removed from?

-For item #5, these items are agreeable, however item (a) also needs to address the water licence under Part D, items 4-6 & 10 (ie. documented authorization from the community of Kugluktuk prior to the backhauling of any waste, etc). Please note that the Kugluktuk municipal waste dump is not considered an "approved site" for the purposes of haz waste disposal. Please ensure you specify between actual disposal locations and staging areas (ie. to await backhaul to an approved site) and provide the records of disposal accordingly.

-For item #7, in terms of drill sites and reclamation, you need to ensure Part F, item 2 and Part I, item 9 are met. As well as coordinates, please provide photographic documentation of the condition these drill sites were left in. If reclamation is required, this info is to be provided as soon as possible to the Inspector, as well as documented in your final report.

-Please ensure there is a listing for all fuel caches and drill laydown areas, complete with coordinates and description of inventory removed as well as photographic documentation of clean up (both before/after where applicable).

Best regards,
Melissa

Melissa Joy, B. Env Sc.
Water Resource Officer
Aboriginal Affairs & Northern Development Canada
P.O. Box 100, Iqaluit, NU, X0A 0H0
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email: melissa.joy@aandc.gc.ca

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>>> "Rein Lehari" <rlehari@silvermet.ca> 4/9/2012 5:02 PM >>>
Dear Melissa

Please find attached a letter proposing our program to complete the reclamation work. I thought it would be easiest to send by email but I can forward an original as well if you prefer. Please let me know when you are in receipt of the letter and whether this satisfies the requirements.

Best regards

Rein

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