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**2BE-TRE**

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**IQA-N 9545-1-2STRG**

May 26th, 2006

Phyllis Beaulieu  
Licensing Administrator  
Nunavut Water Board  
P.O. Box 119  
Gjoa Haven, NU, X0A 1J0

**Re: 2BE-TRE -Strongbow Exploration Inc.- Tree River Project -  
Water License Renewal Application**

On behalf of the Department of Indian Affairs and Northern Development (DIAND), I have reviewed the Water License Renewal Application, submitted by Strongbow Exploration Inc. with respect to the Tree River Project.

In the Abandonment and Restoration Plan, under Description of Facility, Phase I and Phase II, the locations of fuel are discussed. It is mentioned that fuel will be stored at a safe distance (>100m) from water bodies. However, there is no mention of the high water mark with regards to fuel storage. In observing Water license NWB2TRE0406, Part G, Item 4 states that "all sumps and fuel caches shall be located a minimum of 30 meters from the normal high water mark of any adjacent water body." Thus, it is suggested that this provision is adopted to ensure the safe storage of any fuel kept on site.

In looking at the Spill Contingency Plan, under Detailed Response Plan, Section (c) Locations, Phase I and Phase II; In observing Water license NWB2TRE0406, Part G, Item 4 states that "all sumps and fuel caches shall be located a minimum of 30 meters from the normal high water mark of any adjacent water body." Thus, it is suggested that this provision is adopted to ensure the safe storage of any fuel kept on site.

Moving further into the Spill Contingency Plan, under Detailed Response Plan, Phase II, Section (d) Preventative Measures, there is discussion about the use of superfluous fuel drums should a leak occur. Is there a formal convention employed to determine the number of excess drums required based on the given amount of fuel on hand? If so, what this number is and how it was derived should be mentioned.

Under Spill Contingency Plan, under Detailed Response Plan, Section (d) Containment there is a list of containment techniques. Are any of these techniques going to be applied to the site as a preventative measure or are these purely reactionary techniques?

**Canada**

The Supplementary Questionnaire, Section 32, describes the characteristics, quantities, treatment and disposal methods for camp sewage. Water License NWB2TRE0406 Part D, Item 5 states “that all sewage should be discharged into latrine pits located at least thirty (30) meters from the high water mark of any water body. These latrine pits shall be treated with lime and covered with 0.5 m of native material prior to abandonment”. Additionally, INAC requests that back filled areas be contoured to promote surface water runoff away from the sump surface. These conditions should be taken into account with respect to waste treatment and disposal.

The Supplementary Questionnaire, Section 35, requires a description of the location, dimension, volume and freeboard for sumps. Although approximate location is discussed, there is no mention of dimension, volume and freeboard for sumps.

Also, the proponent should update their Spill Contingency Plan to include Mr. Peter Kusugak, (867) 975-4295 as their INAC contact.

Should you have any questions or comments, please do not hesitate to contact me at (867) 975-4548 or by email at [BathoryS@ainc-ianc.gc.ca](mailto:BathoryS@ainc-ianc.gc.ca).

Sincerely,

*Original signed by*

Stephen Bathory  
Regional Coordinator

cc- P.Kusugak