

WATER LICENCE INSPECTION FORM

Original	
Follow-Up	Report

Licensee		Licensee Representative		
Sabina Gold a	nd Silver	Merle Keefe		
Licence No. / Expiry		Representative's Title		
2AM-BRP1831	L	Environmental permitting Manager		
Land / Other Authorizat	ions	Land / Other Authorization	ns	
Date of Inspection		Inspector		
June 19, 2022		Jonathan MESH	IER	
Activities Inspected				
	☐ Drilling ☐ Other:	☐ Construction☐ Other:	Reclamation	☐ Fuel Storage

Conditions: A	- Acceptable	(C - Concern	U - Unacceptab	le	NA –	Not Applicable NI -	- Not Ins	ected
Water Use	Condition	Comment	Site Conditions		Condit ion	Comme nt	Haz/Mat Management	Condition	Comment
Intake/Screen	NA		Water Manager	ment Structures	NA		Storage	С	
Flow Measure. Device	ce A		Culverts / Bridg	es	Α		Spills	NA	
Source:	Α		Drainage		NA		Spill Plan	NI	
Water Use:	Α		Erosion / Sedim	ent	С				
Recirculation (y /n)	NA		Mitigation Mea	sures	Α		Administrative		
			Reclamation Ac	tivities	NA		Records	NI	
			Materials Stora	ge	NA		Reports	NI	
Waste Disposal			Signage				Plans	NI	
Waste Water	NA						Notifications	Α	
Solid Waste	С		Monitoring				Other		
Hazardous Waste	С		Sample Collecti	on / Analysis	А		Follow-up from previous inspection	NI	
	*The numbe	r in the c	omments field wi	ll correspond with	specif	fic comn	nents provided below.		
Samples taken by Ins	spector:		Location(s):						
☐ Yes ⊠ No									

SECTION 1	Comments	Non-Compliance with Act or Licence	Action Required
Background:			

On June 19,2022, I Jonathan Mesher conducted inspections of the following facilities under the licence 2AM-BRP1831; Goose Camp, Gorge Camp and the Marine Laydown Area. During this inspection I was accompanied by; Kelli Gillard (NIRB), Guillaume Daoust (NIRB) and Merle Keefe (Licensee).

Goose Camp:

a. Water Intake

- Water records appear up to date.
- II. The road leading to the water intake appears to have signs of erosion, rutting and consists mostly of mud. Part D, item 7 of the licence 2AM-BRP states; "The Licensee shall implement sediment and erosion control measures prior to and during Construction, and Operations where necessary, to prevent entry of sediment into Water.", therefore the inspector Is requesting that the licensee install erosion control measures on both roads to prevent sediment from enter Goose lake. See photo 1 for one of the water intake roads.

b. Waste Storage

Temporary Waste Storage Facility- This facility had the following concerning items; Food waste, Oil filters and a fuel tank on a welder, The BACK RIVER PROJECT Landfill and Waste Management Plan, section 6.4.1 states the following; "Recyclable non-hazardous, non-combustible waste will be stored in dedicated waste storage facilities located at each of the Project sites" and "Indoor storage for beverage containers will be used to avoid attracting wildlife.". Furthermore section 6.4.2 states that; "Hazardous waste will be stored inside or within lined containment facilities at the Goose Property and MLA to minimize potential leaching to the environment." With the presence of the noted food waste and hazardous waste it appears the licensee is not adhering to the approved Landfill and waste management plan. See photos 2-4 for items noted.



- The licensee is depositing drill waste into a "sump" to the south of the main camp, in the licence a sump is II. defined as the following; " means a structure or depression that collects, controls, and filters liquid waste before it is released to the environment. This structure should be designed to prevent erosion while allowing percolation of liquid waste;". While on site the "sump" had limited freeboard, signs of erosion down gradient leading to ponding water and there appeared to be discoloration of the flora where the erosion lead to. See photos 5-8 for photos of the sump, overflow and potential discolorations from overflow.
- III. Historical waste pile- During the inspection the historical waste pile was sitting in ponding water and there appeared to be a visible sheen indicating hydrocarbon contamination, the inspector requested the licensee collect samples. The BACK RIVER PROJECT Landfill and Waste Management Plan, section 6.4.2 states that; "Hazardous waste will be stored inside or within lined containment facilities at the Goose Property and MLA to minimize potential leaching to the environment." And section 12(1) of the Nunavut Waters and Nunavut Surface Rights Tribunal Act states that; 12 (1) Subject to subsection (2) and except in accordance with the conditions of a licence, no person shall deposit or permit the deposit of waste (a) in waters in Nunavut; or (b) in any other place in Nunavut under conditions in which the waste, or any other waste that results from the deposit of that waste, may enter waters in Nunavut. See photo 9 for the potential hydrocarbon contamination.
- Hazardous materials outside of containment- See photo 10 for a tote of 0W40 (motor oil) outside of IV. containment in the maintenance shop, See photo 11 for contaminated soil sitting on a liner, not contained, near the under ground shop area, see photo 12 for 5 totes outside of containment near the portal.

Section 2 Comments Non-Compliance with Act or Licence Action Required The licensee is to provide a plan 3 weeks after receiving the report to ensure the following concerns are addressed, this plan shall include a timeline for implementation. 1) The licensee is to implement erosion control measures at the water intake roads to prevent the entry of sediment into Goose Lake.

- 2) The licensee is to remove all Hazardous waste and food waste from the Waste Storage Area and store it in an approved manner.
- 3) The license is to provide a plan to ensure the "sump" is operating as a sump as defined in the licence and no longer over flowing into the surrounding water bodies.
- 4) The licensee is to provide an inventory of the historic waste pile, remove all waste from the ponding water and ensure all Hazardous waste is stored in secondary containment.
- 5) The licensee is to ensure all hazardous waste and hazardous materials is stored in a way to prevent waste from entering water and is consistent with the approved licence/Management plans.

Inspector's Name	
Jonathan MESHER	
Signature	
Date	
July 7, 2022	

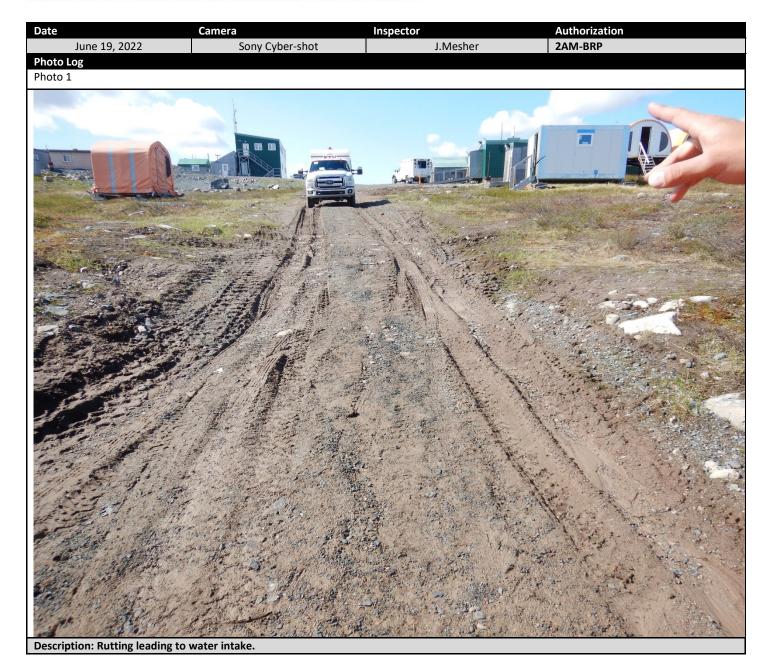
Water Resource Officer, Nunavut Region

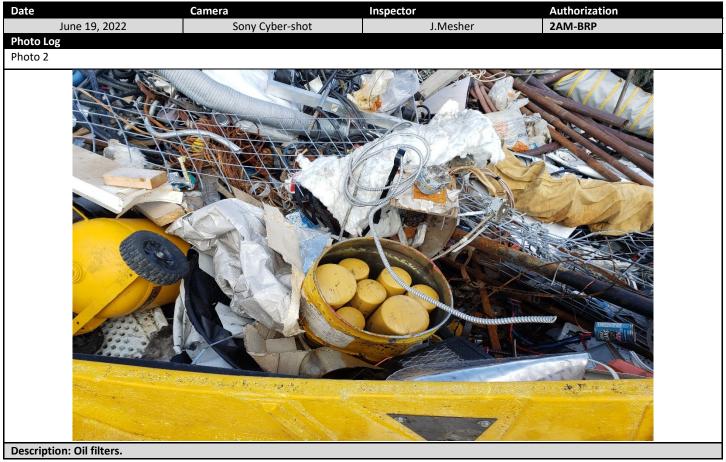
Crown Indigenous Relations and Northern Affairs Canada – CIRNAC

Jonathan.mesher@canada.ca

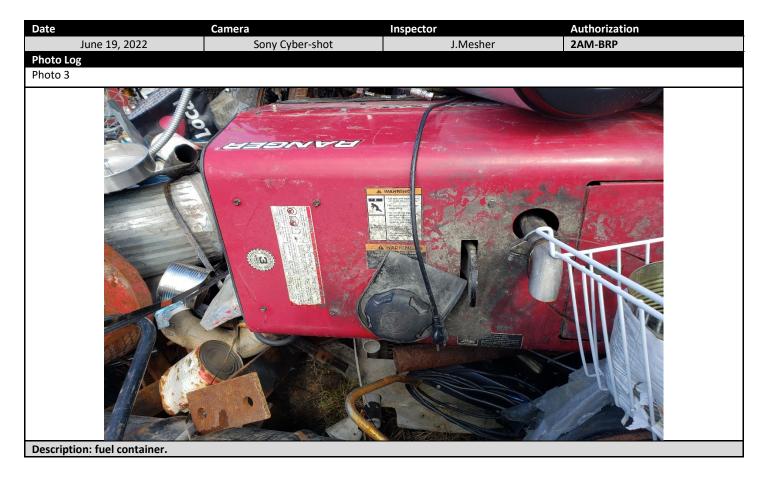
Office #: 867-222-0118 Fax: 867 979-6445

















Date	Camera	Inspector	Authorization
June 19, 2022			
	Sony Cyber-shot	J.Mesher	2AM-BRP

Photo Log Photo 5



Date	Camera	Inspector	Authorization
June 19, 2022			
	Sony Cyber-shot	J.Mesher	2AM-BRP

Photo Log

Photo 6





Description: Erosion down gradient of the "sump"

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Photo Log

Photo 7



Description: Potentially discolored flora from the sump overflow. (looking towards the sump)

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June 19, 2022			
	Sony Cyber-shot	J.Mesher	2AM-BRP

Photo Log

Photo 8





Description: Potential discoloration of the flora (looking away from sump).

	Camera	Inspector	Authorization
June 19, 2022			
	Sony Cyber-shot	J.Mesher	2AM-BRP
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Description: Historical waste pile and potential hydrocarbon contamination.

Date	Camera	Inspector	Authorization
June 19, 2022			
	Sony Cyber-shot	J.Mesher	2AM-BRP

Photo Log

Photo 10



Description: Motor oil not in secondary containment.





J.Mesher	2AM-BRP
	J.Mesher

Photo Log Photo 11



Date	Camera	Inspector	Authorization
June 19, 2022			
	Sony Cyber-shot	J.Mesher	2AM-BRP

Photo Log

Photo 12



Description: Totes outside of containment.



