



**Environment Environnement  
Canada Canada**

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Our file: 4703 003 013  
NWB file: 2AM-DOH0713

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*Via email at: [licensingadmin@nunavutwaterboard.org](mailto:licensingadmin@nunavutwaterboard.org)*

**Re: NWB 2AM-DOH0713- Submission of 2008 Annual Report**

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

Hope Bay Mining Ltd. (HBML) has submitted the 2008 Annual Report for the Doris North Project to the Nunavut Water Board (NWB) as a requirement of Part B, Item 3 for water license 2AM-DOH0713. The proponent has failed to meet some of the conditions outlined in the water license.

HBML has not yet submitted updates for several plans required under the current water license. These plans include, the Hazardous Materials Management Plan, Sewage Management Treatment Plan, Water Management Plan, Emergency Response and Spill Plan, Quality Assurance Quality Control Plan, and Reclamation and Closure Plan. EC recommends that the Board request the proponent provide updated copies of these plans to reflect current site operations. For example, it is stated in the current license that "during construction, treated effluent from the Sewage Treatment Plant (STP) shall be discharged approximately 400 m north of the camp pad. Once the tailings impoundment area (TIA) is operational, all treated effluent from the STP shall be discharged into the TIA." Given that the TIA has been deferred indefinitely, will a new plan for the disposal of treated sewage be established?

In addition, EC was not able to locate other plans required by the current water license. These plans include: Material Management Plan (including the Incineration Management Plan), Construction Monitoring Report, Quarry Rock Construction Monitoring, and Management Plan and the Quarry Rock Seepage Monitoring and Management Program and report. EC looks forward to reviewing these plans once they are made available.

In the Annual Report, HBML states that a Geotechnical Inspection Report, which is required annually under Part J, Item 18 of the current water license, has not been prepared on account that the tailings impoundment area (TIA) has been deferred. However, there are other aspects of the Geotechnical Inspection Report that should be completed even if the TIA has not yet been constructed, these include: Geological instrumentation and associated monitoring data; All weather

access roads; Roberts Bay Jetty; Fuel storage and containment facilities; Sedimentation pond; and, Sumps. EC would be pleased to review this report once it is made available.

Environment Canada would like to take this opportunity to remind HBML of the new Environment Canada regulations for *Storage Tank System for Petroleum and Allied Petroleum Products* which came into force on June 12, 2008. These regulations apply to all outside aboveground, underground and partially buried storage tank systems containing petroleum and allied petroleum products, except above-ground storage tank systems that have a capacity of 2,500 L or less and that are connected to a heating appliance or emergency generator. Further information on these regulations can be found at [www.ec.gc.ca/st-rs](http://www.ec.gc.ca/st-rs).

If there are any further 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) 975-4631 or by email at [carrie.spavor@ec.gc.ca](mailto:carrie.spavor@ec.gc.ca).

Yours truly,

***Original signed by***

Carrie Spavor  
Environmental Assessment Coordinator

c.c: Carey Ogilvie (Head, Environmental Assessment-North, EPO, Yellowknife, NT)  
Anne Wilson (Water Pollution Specialist, EPO, Yellowknife, NT)