



**Environment Environnement
Canada Canada**

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

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**Re: NWB - Notice of Care and Maintenance of the Doris North Type A License
2AM-DOH0713**

On behalf of Environment Canada (EC), I have reviewed the information submitted with the above-mentioned application. 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 notice to the Nunavut Water Board (NWB) requesting that the clauses identified in the marked PDF copy of the water license be placed in the Care and Maintenance phase. HBML is requesting to defer the Doris North Project as a stand-alone project so that a broader belt-wide strategy for the three known deposits Doris, Madrid and Boston can be implemented. In the interim operations will continue to conduct advanced exploration in the Hope Bay Belt, and well as use the camp, airstrip, port, and Roberts Bay road infrastructure, as approved in the current license.

Environment Canada has reviewed the documentation provided and believes that the deferral of the Doris North Project and proposed shift to a regional development plan renders many of the terms and conditions listed in the current water license unapplicable. Our concerns lie chiefly with the operational plans (e.g. waste management) and monitoring aspects that should be specific to the current use of the site. Therefore, EC recommends that the current license either a) be formally amended to cover current activities, rather than placing select terms and conditions into Care and Maintenance, or b) be placed entirely on a Care and Maintenance mode and a separate Type B licence be issued to reflect the interim operations of the Doris North Project. It is unclear whether HBML would plan to initiate development of the activities permitted by water licence 2AM-DOH0713 as the first stage of the belt-wide development, and if this is the case, there may be some advantage to maintaining the existing permits on a Care and Maintenance basis.

In any case, EC asks that the Board require updated copies of the Material Management Plan (including the Incineration Management Plan), Hazardous Materials Management Plan, Emergency Response and Spill Plan, and a Reclamation and Closure Plan. EC looks forward to reviewing these plans once they are made available.

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.

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)