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NWB2JER
Our les Acres reférences
N7L2-1666

July 16, 1999

Ms. Dionne Filiatrault Technical Advisor Nunavut Water Board P.O. Box 119 Gjoa Haven, NT X0E 1J0

Dear Dionne:



Re: Abandonment and Restoration Plan - Jericho Project
Spill Prevention, CounterMeasures and Control Plan - Jericho Project

Further to your requests of June 7th and 8th, 1999, the Water Resources Division has reviewed the above mentioned plans. I apologize for our late submission and offer the following comments for the Board's consideration.

Abandonment and Restoration Plan

The overall goal and specific objectives for restoration are missing from the plan. Although the Licensee emphasizes that there is no intention of abandoning the site, the plan should still address situations such as care and maintenance during off seasons and economic lows. The plan should not only be used when completely abandoning the site but also throughout the life of the project when planning for progressive reclamation.

Overall the plan is adequate for this stage of operation. As the project proceeds, however, the plan should be updated to reflect the status of the project with the goal of restoration as a guiding factor.

Specific comments related to the plan are as follows:

Page 4 - Burning of the liners is not preferred and liners should be moved to a landfill site.

Page 5 - If there has been any acid generating potential tests done then the results should be incorporated into the plan. If required, a description of how acid generating material will be dealt with should also be included in the plan.

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Spill Prevention. CounterMeasures and Control Plan

The preamble and introduction are noticeably absent from this plan.

The sections that describe the actions to be taken in the event of specific types of spills are different and not all procedures have requirements to report to the Spill Line. Each spill should be responded to using the initial actions outlined in the Northwest Territories Water Board's "Guidelines for Contingency Planning" and all spills should be reported to the Spill Line.

A copy of the Spill Report Form and current Material Safety Data Sheets (MSDS) should be included in the plan.

It is recommended that the Licensee revise this plan using the Northwest Territories Water Board's "Guidelines for Contingency Planning". These guidelines are useful in preparing Contingency Plans that enable operators to react quickly and effectively when spills occur.

If you would like to discuss anything further, please feel free to contact me at (867)669-2658.

Sincerely,

Shannon Pagotto
Regional Coordinator

Water Resources Division

c.c. Nunavut District



Environment Canada Environnement Canada

ENVIRONMENTAL PROTECTION BRANCH 5204-50th AVENUE, SUITE 301 YELLOWKNIFE, NT. X1A 1E2 (867) 669-4737 (Telephone) (867) 873-8185 (Fax)

File:

4702 025 JERICHO PROJECT (CARAT LAKE)

July 5th 1999

Ms. Dionne Filiatrault Technical Advisor Nunavut Water Board P.O. Box 119 Gjoa Haven, NT. XOE 1JO



Jericho Project February 1999 Abandonment and Restoration Plan

I am responding to your faxed letter dated June 8th 1999 requesting comments on the February 1999 Abandonment and Restoration Plan submitted by Tahera Corporation.

The plan is generally sufficient for a mineral exploration camp although I do have some comments.

- The plan should identify the need to conduct a general survey for soil contamination. Particular attention should be directed to fuel transfer points and hazardous material storage sites. The operator should consider land-farming techniques for soils contaminated with hydrocarbons, particularly if there will be progressive restoration activities as suggested under Section 4.0 Project Schedule on Page 11.
- Under Section 3.1.2, Fuel Tank Farm, Remediation (Page 4), the operator proposes to burn the tank farm liners. Burning of this material will release a variety of chemicals to the environment. The preferred action should be to investigate opportunities to recycle the material through a back-hauling program. If no market exists, a secondary option would be to bury the liner such that permafrost eventually migrates into the disposal site.

Should you have questions, please call me at (867) 669-4737.

Carey Ogilvie

Environmental Assessment Coordinator







Fisheries and Oceans

Pêches et Océans Canada

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June 24, 1999

Dionne Filiatrault Technical Advisor Nunavut Water Board Box 119 Goa Haven, NT X0E 1J0 NUNAVUT WATER BOARD
JUN 2 4 1999
PUBLIC REGISTRY

Re: Abandonment and Restoration Plan for the Jericho Project NWB1JER9801

On behalf of the Department of Fisheries and Oceans, Habitat Management, (DFO-HM) I have reviewed the above Abandonment and Restoration plan (A & R plan) for the Jericho Project. The review of the A & R Plan is for the current condition of the Jericho Site. Any changes to the Jericho Project will require the appropriate modifications be incorporated into the plan.

3.1.2 Fuel Tank Farm

Contaminated soil from the fuel tank farm is to be excavated and ignited to burn off residual fuels. Once the soil has been excavated where will the burning of the soil take place? It appears the soil is then to be buried where it has been ignited.

Is there a specified burn and bury area?

It is recommended that all contaminated soils be burned and buried in one area. This site would then require monitoring for potential contaminated runoff.

3.2.2 Portal Area

is it feasible for the nearest communities to utilize the dismantled wooden structures? The reuse of wooden structures seems less wasteful, compared to burning. The distance to the site may not make this economically viable.

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3.32 Carat Camp Site

The dismantled wooden structures are to be burnt in the incinerator area. On the previous page (6) it states the incinerator has been placed on a vegetated area. I would recommend that burning not be done on a vegetated area, but on a gravel area. This would eliminate the cover material (1 metre cap of esker) required to cover the burn area and reduce the disturbance to vegetation.

It is stated that the area under the incinerator will be covered with esker sand or suitable material. What constitutes "suitable material" and where will it be acquired?

3.4.2 Service Roads

It is recommended that areas where culverts have been removed be included in the post-closure monitoring. Any signs of slumping or erosion should be stabilized.

3.6.2 Airstrip and Turnaround Pad

The remediation for this area states that capping material will be provide on areas where permafrost stability is a concern and for erosion protection. Have unstable areas been Identified? It is recommended that the unstable areas and areas where there is a potential for erosion be monitored on an ongoing basis throughout the project life. Areas should be stabilized immediately when they have been identified.

3.9 Post-closure Monitoring

It states that water samples from the portal area during late summer in Year 1 and Year 5 be monitored. It then states that the area would be sampled twice, once during the spring freshet and once in the late fall. What time of year will the two samples be taken, spring freshet, late summer or late fall? Please provide a map of the sampling locations once they have been identified. What parameters will be analysed?

Rather than sampling again in Year 5 it is recommended that a review of the results from the water samples be conducted after Year 1. It may be determine that samples need to be collected more frequently.

Visual inspections of restored areas are incorporated into the post-closure monitoring. How often will these take place?

Conclusion

With the submission of Tahera's February 1999 project proposal, it is recommended that a revised A & R plan be submitted once the mine has decided on a course of action. This should incorporate all changes to the site.

3

Please note that none of the foregoing should be taken as authorization of the undertaking in accordance with the Fisheries Act or any other legislation.

If you have any questions, concerns or comments with respect to the above, please do not hesitate to contact me.

Regards,

Margaret Keast

Habitat Management Biologist, Nunavut Area

cc. Gary Weber, Area Manager, DFO - Nunavut Area

cc. Winston Fillatre, Fishery Officer, DFO - Nunavut Area



Cambridge Bay, Northwest Territories, Canada X0E 0C0 Tel: (867) 983-7328 Fax: (867) 983-2253

June 18, 1999

File #500-100-15

Dionne Filiatrault Technical Advisor Nunavut Water Board Gjoa Haven, Nu

Re: Abandonment & Restoration Plan for the Jericho Project

I have reviewed the above-noted document relative to the Jericho Project and noted that there was no mention made of either the solid waste disposal site or the black water disposal site at Carat Camp. I would ask therefore that the proponent address the abandonment and restoration of these sites in their plan so that comments can be offered. Should you have any questions regarding this matter, please do not hesitate to contact me at (867) 669-6722.

Robert Phillips, CPHI(C)

Senior Environmental Health Officer

NUNAVUT WATER BOARD

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