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May 20, 2003

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Sent by email to:

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Comments on Water Licence NWB2MEA0204 Amendment Application for the Meadowbank Project

On behalf of Indian and Northern Affairs Canada (INAC), I am pleased to present the following comments on the application for an amendment to water licence NWB2MEA0204 by Cumberland Resources Ltd. for their Meadowbank Project.

The Meadowbak Gold project is located approximately 70 km north of the Municipality of Baker Lake. The project is currently licenced under the water licence NWB2MEA0204. The scope of this licence covers most of the camp activities, including water use, waste disposal, spill planning, abandonment and restoration, and drilling activities related to exploration.

The amendment application relates to the creation of new fuel tanks and the addition of trenching exploration to the camp activities for 2003. INAC's comments will therefore focus on these two new aspects of the project.

Fuel Storage

The proponent plans on installing four 75,000 L double-walled fuel vaults in the north camp, adjacent to those installed in 2002. Three tanks will be used for diesel containment, while the fourth would hold Jet-B helicopter fuel. Tank installation will adhere to the procedures used in the 2002 installation of the five tanks currently at the site.

With respect to this aspect of the amendment, INAC has no recommendations beyond the conditions that are already included in water licence NWB2MEA0204. Specifically, we refer to water licence condition Part F, Item 1, which states that all fuel caches shall be located a minimum of 30 metres from the normal high water mark and in such a manner that no fuel can enter any such water body. In this case, "such a manner that no fuel can enter any such water body" should imply the use of some form of secondary containment, such as a

berm and/or liner.

Also, as per Part F, Item 3 of the water licence, all spills should be reported to the 24-hour Spill Line and to INAC's Water Resources Officer. Relating to this, INAC would like to point out that the phone number for contacting INAC (a.k.a. DIAND) in Iqaluit in the *Fuel Transport and Storage Management Plan* (January 2003) on p.13 is incorrect. The correct phone number should be (867) 975-4298.

Trenching

The proponent expects to dig six trenches in the Vault Deposit area, and one additional trench in the Third Portage Deposit area. The proponent indicates that there are no concerns of oxidation or metal leaching from the rocks exposed during the trenching exploration program.

INAC recommends that surface runoff be managed in such a way as to prevent or minimize the amount of water that may enter into the trenching area. This should include both preventing the water from entering the trenches proper, and from preventing water from flowing through the waste piles generated by the trenching. Any water that does enter the trenching area should be contained and tested prior to discharge into the environment to ensure that it meets the standard effluent criteria.

Should the waters that enters the trenching area be deemed unsafe to discharge into the environment, the proponent should ensure that it has a sump or other containment area of sufficient capacity to accommodate the amount of waste water generated from the trenching activities.

Finally, all the terms and conditions of water licence NWB2MEA0204 should remain in effect and apply to trenching activities.

If you have any concerns or questions, please feel free to contact me.

Sincerely,

Original Signed By: Michael Roy

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