



Nunavut Regional Office
P.O. Box 100
Iqaluit, NU, X0A 0H0

March 24, 2005

Manager of Licensing
Nunavut Water Board
P.O. Box 119
Gjoa Haven, NU, X0E 1J0

Your file - Votre référence
NWB2MEA
Our file - Notre référence
9545-2-2-MEA

Via electronic mail to:
licensing@nwb.nunavut.ca

Re: NWB2MEA Water Licence Application

On behalf of Indian and Northern Affairs Canada (INAC), I would like to thank the Nunavut Water Board (NWB) for the opportunity to provide comment on the Water Licence application of Cumberland Resources Ltd. (the Proponent). Following expiration of the previous Water Licence (NWB2MEA0204) on December 31, 2004, the Proponent has applied for a new Water Licence to cover exploration activities at the Meadowbank site for the years 2005 through 2007.

The current Water Licence application encompasses water use and waste disposal activities related to exploration camp operation, diamond drilling, airstrip construction, and abandonment and reclamation on the site over the coming 2 years. INAC provides the following comments and recommendations with respect to the Meadowbank Water Licence application:

Water Licence Application Form

Question 13. It is noted that while the Proponent has provided a list of the studies undertaken, copies of the studies/reports/research were not included in the application.

Exploration/Remote Camp Supplementary Questionnaire

Question 5. The Proponent has indicated that the Water Licence will be required for the period April, 2005 - October, 2007. In the 2005 Proposed Work Plan, however, the proponent has identified activities, such as diamond drilling, that are scheduled for late March 2005. The Proponent is reminded that, in the absence of a valid Water Licence, it is an offence under the *Nunavut Waters and Nunavut Surface Rights Tribunal Act* to carry out any activity for which a Water Licence is required.

Question 19. The Proponent has identified that the drill cuttings may be deposited into a natural sump when drilling is conducted on the ice. It is expected that the Proponent will not leave drill cuttings in an on-ice sump. INAC therefore recommends that the Proponent provide the complete disposal procedures for all drill cuttings.

Question 25. On March 31, 2004, the Nunavut Impact Review Board (NIRB) approved the Proponent's application for the construction of a single 5ML fuel tank for exploration purposes. The existence, or proposed construction, of a 5ML tank is not cited in the supplementary questionnaire or in the Fuel Transport and Storage Management Plan. If the Proponent anticipates the construction and/or operation of a 5ML fuel tank under the current Water Licence application, this should be clearly identified.

Questions 32, 35, & 36.

The Proponent has not provided an estimate of the volume of greywater to be disposed of on-site, the location and dimensions of the greywater sump, or the monitoring (if any) of any sump leachates. INAC requests that the Proponent provide this information in order to complete the Water Licence application.

Airstrip Construction

The Proponent has indicated, in the 2005 Proposed Work Plan, that the construction of an airstrip is planned to occur in 2005. The material used to construct the airstrip and associated fuel access road will consist of local fill and crushed aggregate from a nearby quarry. A ditch will also be constructed around the airstrip to collect run-off.

The Proponent has indicated that field testing of leaching potential will be done during the cut and fill dozer operation. INAC recommends that the Proponent provide, to the NWB, the following information:

- A geochemical description of all types of material that will be utilized, or otherwise exposed, during airstrip construction and operation.
- A plan that provides for the sampling and testing of any rock/fill that might reasonably be expected to have the potential to generate metal leaching or acid rock drainage.
- A copy of any laboratory results pertaining to materials tested for metal leaching or acid generation potential.
- If any of the materials to be used or exposed in airstrip construction and operation are found to present an environmental risk, the Proponent should provide a plan showing how these risks will be managed, mitigated, and/or removed.

Once the airstrip is completed, INAC recommends that a fuel spill kit be stored at the airstrip site in close proximity to the re-fueling area(s). It is additionally recommended that the Proponent provide the NWB with information on discharges and/or monitoring (if any) associated with the runway water collection sump.

INAC once again thanks the NWB for the opportunity to provide comment on this application. Please do not hesitate to contact the undersigned at (867) 975-4555 if there are any questions or concerns.

Best regards,

Original signed by:

Stephanie Hawkins
Qikiqtani Regional Coordinator
Water Resources
Phone: (867) 975-4555
Fax: (867) 975-4585
Email: hawkinss@inac-ainc.gc.ca