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October 24, 2005 Our file: 4703 001 015

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RE: NWB2MEA – Cumberland Resources Ltd. – Meadowbank Exploration Program – Fuel and Storage Management Plan

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 Environment Canada's mandated responsibilities for the enforcement of the *Canadian Environmental Protection Act*, Section 36(3) of the *Fisheries Act*, the *Migratory Birds Convention Act*, and the *Species at Risk Act*.

Cumberland Resources Ltd. has submitted a Fuel Transport and Storage Management Plan for the Meadowbank Gold Project. The Plan outlines the proponent's response plan for spills resulting from transportation incidents while in transit between Baker Lake and the Meadowbank Project, as well as fuel storage facilities located at the project site. The Main Camp is serviced by four 50,000 L tanks and four 75,000 L tanks. The North Camp is serviced by five 50,000 L tanks and four 75,000 L tanks, with one additional 50,000 L tank located near the equipment laydown area.

Environment Canada recommends that the following conditions be applied throughout all stages of the project:

- The Plan states that gasoline is stored in 205 L drums rather than fuel vaults. Environment Canada recommends that secondary containment, such as self-supporting insta-berms, be used when storing barreled fuel on location.
- The Meadowbank Camp Map included with the Plan should clearly indicate the location of all fuel tank farms / vaults, as well as the storage location of the 205 L drums. The map should also indicate the location of spill kits at the site.
- The Spill Response Actions for Gasoline should include measures for removing product released on to snow and ice outside of work/depot yards.
- The Plan currently only contains information regarding safety measures for waste oil. Spill Response actions should also be provided.
- Section VIII: External Resources Government refers to the Environmental Protection and Conservation Service of Environment Canada. The proponent should note that the correct name of the service is the Environmental Protection Service.
- The report indicates that the purpose of the Plan is to "facilitate the efficient cleanup of spills
 as the result of transportation incidents while in transit between Baker Lake and
 Cumberland Resources Ltd. exploration site at the Meadowbank project...". However, the
 plan does not provide information regarding spills in transit. The Plan indicates that Peter's
 Expediting is responsible for ensuring that Delta operators are following a safe operator's



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code. Cumberland Resources Ltd. should note that they are responsible for ensuring that all field operations staff are aware of the Fuel Transport and Storage Management Plan commitments and be provided with appropriate advice / training on how to implement mitigation measures.

- The proponent should ensure that spill kits are located along the transportation route, and the location of these kits should be indicated on a map. Vehicles used in transporting fuel and chemicals should also be equipped with portable spill kits to allow for the efficient and expeditious response to spills.
- Drip pans, or other similar preventative measures, should be used when refueling equipment on site.

If there are any 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) 975-4639 or by email at colette.spagnuolo@ec.gc.ca.

Yours truly,

Original signed by

Colette Spagnuolo Environmental Assessment / Contaminated Sites Specialist

cc: (Stephen Harbicht, Head, Assessment and Monitoring, Environment Canada, Yellowknife)

