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NUNAVUT WATER BOARD  
NUNAVUT IMALIRIYIN KATIMAYINGI  
OFFICE DES EAUX DU NUNAVUT

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File: 2BB-MEA0507/H1/I1

July 18, 2006

*By Email and Regular Mail*

Roger March  
Senior Project Geologist  
Cumberland Resources Ltd.  
950-505 Burrard Street  
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**Subject: Cumberland Resources Ltd.; Submission of an addendum to the Fuel Transportation and Storage Management Plan and an Abandonment and Restoration Plan for the Meadowbank Gold Project; Licence No. 2BB-MEA507 (previously NWB2MEA0507)**

Dear Mr. March;

The Nunavut Water Board ("NWB") would like to acknowledge the receipt of the above two documents under Part H, Item 1 and Part I, Item 1 respectively, of Licence 2BB-MEA0507. Both Plans were submitted as an update to the revised Plans that were submitted June 10, 2005 in accordance with the Licence.

The Fuel Transportation and Storage Management Plan (FTSMP) and the Abandonment and Restoration Plan revisions were originally distributed on September 23, 2005 for public review with the application for Licence amendment for the Bulk Fuel Tank Storage construction, with a deadline of October 23, 2005. The representations received from interested persons have been taken into consideration and upon further internal technical review, the NWB has determined that both Plans will require revision prior to meeting the NWB requirements.

With respect to the Fuel Transportation and Storage Management Plan, Meadowbank Gold Project, the NWB requests that a revision to the Plan be provided within sixty (60) days of this letter. Part H, Item 1 requires that the Licensee prepare the Plan in accordance with the *Guideline to Contingency Planning in the NWT, 1987* taking into consideration the following items that were determined to be deficient within the current Plan and any other information that may be arise during the revision process:

- Consider renaming the document to more accurately reflect the NWB requirements, the GN adopted Spill Contingency Planning and Reporting Regulations and CCME Code (i.e. Emergency response Contingency Plan); storage management is not necessarily the objective of a spill plan, however preventative measures should be included where required;
- Within Section I, it should clearly indicate who the person in charge is, title and contact information (usually the Corporate office) and also who the person responsible is, title and 24 hour contact number (site manager);
- The Plan is to indicate the period that it is to be effective.
- A Tabulated inventory of products on site, quantity and storage method;

- A site map is required, of a larger scale, to more clearly identify the facility in relationship to other areas that may be affected by a spill. This should include components of the project camp, any culverts, drainage patterns and nearby water bodies;
- Either remove contact names at government agencies or change to most current (inquire). The INAC Water Resources Inspector is Mr. Pat Larocque;
- Revise contact list to include Environment Canada, Iqaluit at Ph. 867-975-4644 and Fax. 867-975-4594 and the Environment Canada Enforcement 24 hour emergency pager at 867-920-5131;
- Other Government numbers should be included in the contact list are Government of Nunavut, Environmental Protection, Iqaluit at 867-975-5910; GN Wildlife Officer at 867-793-2944 and the Kivalliq Inuit Association in Rankin Inlet at 867-645-2800;
- Replace the NWT Spill Report Form with a Nunavut Government Spill Report form with translation (available on the NWB ftp site), when reporting, in the Plan please refer to contacting the **Nunavut** 24 Hour Spill Report Line;
- The INAC Water Resources Inspector in Iqaluit is to be notified along with the Nunavut 24Hr Spill Report Line when reporting a spill 867-975-4298, this should be indicated in Section II on Spill Response. Preferably, this should be contained in a section on “Reporting” as per the guideline;
- Training is an integral part of a successful SCP and therefore the Company should ensure that all personnel, including contractors (including fuel transport) are aware of the SCP and receive appropriate training. This section should also indicate, in detail, the expertise and formal training of personnel responsible for supervising the response as well as any training or simulation exercises which are planned or required. The only reference to training is within Appendix B which does not provide adequate information. A section on training is to be included within the Plan;
- A the disposal of contaminated materials (soils, absorbents etc.) needs to be address by the Plan, including the location of disposal sites approved to accept wastes;
- If contaminated materials are to be shipped off site (hazardous wastes), then registration with the Nunavut Government, Department of Environment as a waste generator and/or a carrier is required along with the completion of a transportation manifest when required;
- Of the Plan objectives, responding to an incident along the transportation route is to be included. Additional detail is required with respect to responding to spills in transit from Baker Lake to the project site. Identify the equipment and personnel available to respond to a spill either from the project site or Baker Lake. Additional information is required on the procedures involved in dealing with more than the “small” spill identified in Appendix B (less than 205L). Currently there is no information available within the Plan on the response to a transportation incident for control, containment, cleanup and disposal;
- An equipment list should be referenced and provided in the appendix for the response to a spill, especially for spills associated with the 100km winter road.

With respect to the Abandonment and Restoration Plan, Meadowbank Gold Project, the NWB requests that a revision to the Plan be provided within sixty (60) days of this letter, taking into consideration the following items that were determined to be deficient within the current Plan:

- In order to meet Part I, Item 1 of the Licence, the Plan is to be prepared in accordance with the *Guidelines for Abandonment and Restoration Planning for Mines in the NWT, 1990*. These guidelines indicate that all abandonment scenarios are to be addressed

within the Plan; Planned Shutdown, Long Term Shutdown and Final Closure. The current Plan is limited to the final closure of the Meadowbank Gold Project;

- Provide a Table of Contents;
- Within Section I, it should clearly indicate who the person in charge is, title and contact information (usually the Corporate office) and also who the person responsible is, title and 24 hour contact number (site manager);
- A more complete description of the site components is necessary covering camps (both north and south), accommodations, water supply, waste disposal, power generation, accessibility, fuel and petroleum product storage and inventory, drill sites etc.;
- Include an effective period for the Plan (i.e. term of licence); a description of other regulatory instruments in place, for example the Kivalliq Inuit Association or INAC; a larger scale map that fully illustrates the site components in relation to sensitive environmental habitat; and an indication that the Hamlet or other location has provided approval for the disposal of non-combustible or hazardous waste;
- The burning of buildings, materials and equipment on site requires further description on how this will be actioned, what equipment is “combustible”? and will all hazardous materials be removed prior to burning?;
- A schedule needs to be included for completion of the planned restoration;
- In the cost estimate, a footnote is included that refers to “no credit” being considered for salvaged equipment however, in the introduction of the Plan there is reference to the “offset” of costs of shipping by the equipment residual value? Some explanation might be useful;
- There needs to be information on the issue of contaminated soils and their disposal either on-site through treatment or shipment to a facility. The fuel tank farm and fuel vault areas need to be addressed as these will undoubtedly have contamination issues either with the containment area or outlying area. Refueling locations for aircraft (fixed wing or helicopter);
- Additional detail on the closure of the 5million litre fuel storage is required, cleaning of the tank is discussed however the disposal of any solutions or residues has not been addressed;
- Drill sites require reclamation either ongoing or as final abandonment takes place, progressive reclamation is preferred and should be practiced throughout the life of the project;

The NWB looks forward to the submission of the revised documents within the timeframe indicated so that the Plans may be distributed for additional review. The intent is to have these two plans meet NWB requirements and receive approval prior to the commissioning of the 5.6 Million Litre, Bulk Fuel Tank Storage and the A&R of the previous fuel storage. Should you have any further questions, please feel free to contact me at (780) 443-4406, at your earliest convenience.

Yours truly,  
***Original Signed by:***

David Hohnstein, C.E.T.  
Technical Advisor Mining

Cc: Distribution list