



Water Resources Division
Nunavut Regional Office
Iqaluit, NU X0A 0H0

October 29, 2008

Richard Dwyer
Licensing Administrator
Nunavut Water Board
PO Box 119
Gjoa Haven, NU X0A 1J0

**Re: 2BE-MEL0709 – Type 'B', Water Licence Amendment Application –
Comaplex Minerals Corp. – Meliadine West Gold Project**

Please be advised that Indian and Northern Affairs Canada (INAC) has completed a review of a Type 'B' Water Licence application for an amendment to the Meliadine West Gold Project. The application was submitted to the Nunavut Water Board (NWB) by Comaplex Minerals on September 15, 2008. Attached is a Technical Review Memorandum for your consideration in the approval of the amendment application.

Please feel free to contact me should you have any questions or comments. I can be reached at (867) 975-4566 or by email at trenholmt@inac.gc.ca.

Sincerely,

Original signed by

Tanya Trenholm
Pollution Policy Specialist



October 29, 2008

Our File #: 9545-2-2.2BB.MELA
Doc. CIDMS #: 274057

Technical Review Memorandum

To: Phyllis Beaulieu, Manager of Licensing - Nunavut Water Board

From: Tanya Trenholm, Pollution Policy Specialist - Indian and Northern Affairs
Canada – Nunavut Regional Office – Water Resources Division

**Re: Comaplex Minerals Corporation – Meliadine West Gold Project –
Application for amendment**

Existing Water Licence # - 2BB-MEL0709

Project Summary:

The Meliadine West gold project is located 25 km west – northwest of Rankin Inlet in the Kivalliq Region of Nunavut. The Project is considered to be in the advance exploration stage of development, and includes a yearly diamond drilling and bulk sampling program.

On August 13, 2008 the Indian and Northern Affairs Water Resources Officer issued direction to Comaplex as a result of deficiencies noted during an August 2, 2008 inspection of the site.

On September 8, 2008, Mark Balog on behalf of Comaplex requested a Minister's review of the Inspector's Direction. As of this date this review has not been completed. In their September 8, 2008 correspondence, Comaplex provided specific responses to all of the items stated in the August 13, 2008 Inspector's Direction with the exception of the following;

- Within 30 days of issuance of Direction, install flow meters on the intake for all domestic and drilling uses of water.
- Within 30 days of issuance of Direction, discontinue the discharge of grey water at the current location and install means by which grey water will not be deposited directly into Meliadane Lake.

The NWB should consider imposing conditions that address the above noted deficiencies.

At this time, the Minister has not completed a review of the Direction.

As referenced in their September 8, 2008 correspondence, Comaplex has applied to the NWB to amend their Type 'B' water license for upgrades to the project and camp site. These upgrades include;



- 1) A request to build a semi-permanent fuel berm of sufficient size to hold all fuel bladders and drums currently on the Meliadine West Property.
- 2) A request to allow for the construction and operation of a land farm to treat soils contaminated with petroleum hydrocarbons. This land farm is currently in operation on the waste rock pad, without NWB approval.

Comments / Recommendations:

A. General:

The present operation of the land farm is in contravention of Section 12 of the Nunavut Waters, Nunavut Surface Rights Tribunal Act.

B. Soil Land Farm:

- 1) There should be no effluent discharge of contaminated wastewater permitted without prior approval from the NWB. Contaminated liquid collected within the treatment area must be analyzed for, at least, BTEX compounds to determine compliance with the CCME Guidelines for the protection of Aquatic Life 2003.
- 2) Comaplex should reconstruct the current land farm operation such that all remediation takes place within a lined,bermed area.
- 3) INAC recommends that an independent consultant with expertise in soil sampling techniques obtain samples after the remediation process is complete to ensure that any reuse of treated soils will not impact the surrounding environment including any waters.
- 4) A contingency and mitigation plan must be provided to address the possibility of seepage from the land farm. One consideration would be to dig a trench around the land farm with an HDPE liner to collect any seepage.
- 5) The proponent should identify the type(s) of contaminated material (fuels) transferred to the land farm. Soil or snow contaminated with heavy metals, glycols and/or heavy oils should not be placed in the land farm.
- 6) The recommended depths for contaminated soil should range between 30 and 45 cm. Thicker soil depths require more tilling to provide aeration of the contaminated soils. This could potentially affect the time (lengthen) required for proper remediation.
- 7) A detailed summary of procedures for the construction and operation of the land farm should be provided to the Nunavut Water Board. Proper equipment and appropriately trained personal must be employed when tilling the contaminated soil and care should be taken when using the equipment. Any misuse could cause tears to any liner which may result in seepage outside of the land farm.



C. Semi-Permanent Fuel Berm:

- 1) Details provided by Comaplex Minerals Inc. in the 'application for amendment - Fuel Containment Berm Details', dated September 15, 2008, state 'the berm will be built according to present industry standards (as for similar berms at other projects) and to the standards as laid out in the INAC document "Draft Fuel Storage and Handling Guidelines". INAC recommends that the Nunavut Water Board apply a standard condition to ensure the proponent adheres to the "Storage Tank Systems for Petroleum Products and Allied Petroleum Products Regulations" which came into force June 12, 2008 under the *Canadian Environmental Protection Act* and apply nationally to any storage tank system located on federal or aboriginal land.

Should you have any questions or comments, please do not hesitate to contact me at (867) 975-4568 or by email at TrenholmT@inac.gc.ca.

Sincerely,

Original signed by

Tanya Trenholm
Pollution Policy Specialist

Cc: Kevin Buck, Manager Water Resources Division, Nunavut Regional Office,
Indian and Northern Affairs Canada