



**Environment Canada** **Environnement Canada**

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21 October 2005

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*Via Email*

**Re: NWB2MEL0507/TR/G1 – Comaplex Minerals Corporation – Submission of Fuel Management and Spill Contingency 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*.

Comaplex Minerals Corporation (Comaplex) has submitted a Fuel Management and Spill Contingency Plan as a requirement of Part G, Item 1 of its NWB2MEL0507 water licence. This licence applies to the Meliadine West Gold Project located 25 km north of Rankin Inlet with coordinates of 63° 01' 30"N, 92° 10' 20"W. This project is in an exploration phase. Its camp is positioned on a peninsula that extends into Lake Meliadine and can accommodate 75 people. The proponent has conducted mineral exploration activities on Inuit Owned Lands in the Meliadine West area since June of 1995. It intends to perform both surface diamond drilling and underground exploration (bulk sampling) operations in the near future.

The project is accessible by truck through the use of a winter road that passes over tundra, fresh water ice, and the sea ice of Hudson Bay, having a haul route of 28 km. This seasonal road is used to transport most bulk supplies, including fuel, to the project area. The proponent is considering the construction of an all-season road between the project's camp and deposit in the late winter/spring of 2006 in an effort to facilitate exploration activities and the development of a commercial mine.

The proponent's Fuel Management and Spill Contingency Plan discusses transportation, storage, and handling procedures for petroleum products. Maps of the Meliadine Property and the Meliadine Lake Camp, spill response guidelines, and an inventory of spill response equipment have been provided in this document. Should a spill occur, Comaplex will notify the NWT 24-Hour Spill Report Line at (867) 920-8130.



Environment Canada encourages the proponent to consider the following recommendations when revising its Meliadine West Gold Project's Fuel Management and Spill Contingency Plan.

- Spill Response
  - For an effective spill response there must be some expertise on site to direct equipment deployment operations. To ensure that the Spill Response Team is prepared to respond to a spill situation in a reasonable manner, hands-on training and familiarization with equipment used for spill containment and recovery is critical. It provides the response crews with an understanding of the limitations or potential problems that may be encountered in the use of the various equipment pieces.
  - Personnel should be made aware of the properties of the products that they handle and have access to material safety data sheets (MSDS) and other sources of information.
- A spill contingency plan aimed at reducing potential risks should provide the following elements:
  - A description of the properties and characteristics of the substances, maximum expected quantity, storage location, and potential consequences from an environmental emergency on the environment or human health.
  - Identification of any reasonable environmental emergency expected to occur.
  - Description of the measures to be used to prevent, prepare for, respond to, and recover from any environmental emergency identified above.
  - List of individuals, identified by name or position, who will carry into effect the plan and descriptions of their roles and responsibilities. Contact information for these personnel should also be provided.
  - Identification of training required.
  - List of emergency equipment and location.
  - Identification of measures to be taken to notify members of the public who may be adversely affected by an environmental emergency.
- Section 35 of the *Migratory Birds Regulations* states that **no person shall deposit or permit to be deposited, oil, oil wastes or any other substance harmful to migratory birds in any waters or any area frequented by migratory birds**. Therefore, the Canadian Wildlife Service recommends that sumps be backfilled or made otherwise inaccessible to migratory birds prior to their arrival in spring and that the proponent ensure all spills are thoroughly cleaned up.
- The Spill Contingency Plan should clearly indicate that all spills are to be documented and reported to the 24-Hour Spill Report Line at (867) 920-8130. Please ensure that all references to this spill report line have the correct telephone number. The wrong area code is used in a few occasions, such as Appendix C's NWT spill response form. Attached to this review letter is the correct NWT Spill Report Form.
- Comaplex should provide separate maps which display the winter road transportation route from Rankin Inlet to the project area and the proposed all-season road which connects the project site to the deposit.
- Environment Canada recommends that spill kits be located along the winter road transportation routes, and that equipment using the road also be equipped with mobile spill response kits. The location of the spill kits along the road should be indicated on maps.



- EC recognizes that the proponent has provided valuable information pertaining to the content and locations of spill kits. In an effort to improve its spill contingency planning, Comaplex is requested to state the number of spill kits and provide a detailed list of their content.
- According to Part H, Item 1 (iii) of the proponent's water licence, spill contingency planning entails preparing a chemical inventory that describes their types, volumes, containers, and storage locations. A spill kit and relevant MSDS sheets are to be kept at all chemical storage locations.
- The proponent has stated that it will be contracting out fuel and lubricant delivery to the site. Please ensure that all persons involved in the transport, handling, storage, and use of fuels, lubricants or any other hazardous material be provided with a copy of Comaplex's most up to date Spill Contingency Plan including phone numbers and contact information in the event of a spill. In Section F of the Spill Contingency Plan, it is stated that fuel haul contractors are to develop and maintain company specific contingency plans. EC requests that these plans and the contact information of contractors be provided in the Fuel Management and Spill Contingency Plan for review.
- The proponent has stated that there will be no fuel storage within 30 m of any water body. Please note that EC requires that all sumps, pits, spill basins, and fuel caches shall be located above the high water mark of any waterbody and in such a manner as to prevent the contents from entering any waterbody frequented by fish. Therefore, please note that maintaining a buffer of 30 m may not always be an adequate preventative measure.
- Will there be adequate equipment on site to deal with urgent situations, i.e., equipment necessary to construct diversion trenches or berms in the event of major incidents?
- EC suggests lining fuel storage areas with an impermeable liner as a preventative measure against potential future soil and groundwater contamination from fuel spills. Care in installation of liners is strongly recommended since the integrity of the liner must be maintained in order to be effective. EC recommends the use of secondary containment, such as self-supporting insta-berms, when storing barreled fuel on location rather than relying on natural depressions.
- The proponent shall not store materials on the surface ice of Lake Meliadine, or any other lake or stream, except that which is for immediate use.
- EC recommends that all field operations staff be made aware of the proponents' fuel management and spill contingency commitments and be provided with appropriate advice / training on how to implement mitigation measures.



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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 if you have any questions or comments with regards to the foregoing at (867) 975-4631 or by email via [david.abernethy@ec.gc.ca](mailto:david.abernethy@ec.gc.ca).

Regards,

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Environmental Assessment Technician

cc: Colette Spagnuolo (Environmental Assessment & Contaminated Sites Specialist, Iqaluit)