



Environment Canada Environnement
Canada Canada

Environment Canada
Prairie and Northern Region
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July 4th, 2008

Our File: 4703 001 062
Your File: 2BB-MEL0709/TR/11

Richard Dwyer
Licensing Administrator
Nunavut Water Board
P.O. Box 119
Gjoa Haven, NU
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**Re: Revised Abandonment & Restoration Plan - Meliadine West Gold Project –
Comaplex Minerals Corp.**

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*.

Waste Management:

Sections 3.1 *Structures* and 3.5 *Non-combustible Waste* both refer to the burning of unsalvageable material. It states that "unsalvaged combustible materials will be consolidated on a mineral soil area like a rock pad to reduce the number of sites used and to avoid, as much as possible, any areas of scorched tundra". EC would like to know what type of material is being proposed for open burning and approximately how much? EC recommends that the proponent refer to the attached guidelines by the Government of Nunavut in regards to open burning. Should open burning be permitted, EC recommends that this does not take place on the tundra soil, and only rock or gravel pads are used. Furthermore, there is no referral to a Waste Management Plan, where typically incineration issues are addressed. A Waste Management Plan should be in place and if such a plan exists EC would like to review the plan.

Demobilization:

Section 3.4 *Drilling materials and fuel* states that all fuel and fuel infrastructure will be removed to Rankin Inlet for local disposal or sale. Does the proponent have confirmation from the community of Rankin Inlet for disposal of all possible materials that are not sold? Confirmation should be obtained and attached to the Abandonment & Restoration Plan.

Diamond Drilling Activities:

As per EC's comments on the previous A&R Plan, EC requests the inclusion of abandonment and restoration procedures for diamond drilling activities in the A&R Plan. EC recommends the following practices:

- Drilling wastes from land based drilling shall be disposed of in a sump such that the contents do not enter any water body.
- All sumps shall be backfilled upon completion of drilling and contoured to match to surrounding landscape.
- If an artesian flow is encountered, the drill hole shall be immediately plugged and permanently sealed.

Should you have any questions regarding the foregoing, please contact me at 867-669-4772 or via e-mail at savanna.levenson@ec.gc.ca

Yours truly,

Savanna Levenson
Environmental Assessment Specialist
Environmental Protection Operations

c.c: Carey Ogilvie, Head EA North, Environment Canada
Anne Wilson, Water Pollution Specialist, Environment Canada
Helen Yeh, Government of Nunavut

Government of Nunavut's guidelines on open burning:

Municipal Solid Wastes Suitable for Open Burning

Municipal solid wastes (MSW) that are conditionally suitable for open burning are paper products, paperboard packing and untreated wood wastes only.

Conditions for this burning are:

1. The principle of source reduction should be utilized to reduce, reuse and recycle materials otherwise bound for landfill.
2. The appropriate materials are segregated and burned in a controlled manner and at a controlled site which is separate from the working landfill so that the fire cannot spread.
3. Standard burning conditions shall apply, such as burning on days where winds are light and blowing away from the community.
4. Materials are burned in manageable volumes so that fires do not get out of control.
5. Having applicable permits for burning.
6. Managed by authorized, qualified personnel from the community.
7. The above conditions are also recommended in the NWT Municipal and Community Affairs Solid Waste Modified Landfill Guidelines, which have been adopted for Nunavut.

Building demolition wastes should not be burned unless they have been sorted to remove non-wood waste such as roofing materials, electrical wire, plastics, asbestos and other non-wood wastes.

Waste wood treated with preservatives such as creosote, pentachlorophenol or heavy metal solutions shall not be burned. Examples of treated wood materials include railroad ties, telephone/hydro poles, pilings, cribbing and foundations.

Following a review of the specific landfill location, additional local conditions or controls may be applied.

Where geographic conditions do not allow for the proper operation of a modified landfill, such as limited availability of cover materials and unsuitable ground conditions, communities may have to assess other alternatives of MSW management i.e.: balefill and/or incineration.

The open burning of non-segregated MSW remains an unacceptable option for the management of MSW. Continuation of this practice should not be allowed unless a site-specific assessment fails to identify a feasible and practical alternative. At this point, some form of segregation will be required.