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Department of Environment

Ministère de l'Environnement

June 13, 2004

Mrs. Phyllis Beaulieu
Manager of Licensing
Nunavut Water Board
P.O. Box 119
Gjoa Haven, NU
X0E 1J0

NWB File:
NWB2MRY0406

via Email to:
licensing@nwb.nunavut.ca

Dear Mrs. Beaulieu:

Re: SPILL CONTINGENCY AND ABANDONMENT & RESTORATION PLAN
MARY RIVER PROJECT

The Department of Environment (DOE), Government of Nunavut has reviewed the Spill Contingency and Abandonment & Restoration Plans for the Mary River Project, Baffinland Iron Mines Corp., Nunavut". These reports were submitted to the NWB under Baffinland Iron Mines Corp. current water license, amendment "Type B".

Comments/Recommendations:

Spill Contingency Plan

- 1) Baffinland Iron should provide a description of the facility including the location (UTM or GPS Coordinates), size, and storage capacity. This is important if persons are unfamiliar with the facility or area.
- 2) A list of emergency contact names and numbers should be included in the SCP (i.e. hospital, fire, police, and clean-up specialist) in the event of a large spill.
- 3) The proponent may want to include the NWT/Nunavut Spill Report form in the SCP as well.
- 4) All of the workers on site should have adequate training in dealing with fuel spills especially those who will be activating the contingency plan in the event of a spill.
- 5) The proponent should provide a list of equipment they will use to clean up spills (i.e. Shovel, pick axe, drums etc).

Abandonment & Restoration Plan

- 1) Baffinland Iron should provide contact names and numbers for the owner, project manager, and site supervisor in the event of an accident or spill.
- 2) It is important to provide accurate amounts of materials (fuels, chemicals etc.) stored on site for the safety of the workers, and it would allow the company to accurately determine the amount of material lost in the event of a spill.

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- 3) All fuels, chemicals, structures and equipment should be disposed off or removed from site at the end of the project.
- 4) Drill holes and sumps should be capped and backfilled, also any other disturbed area should be re-contoured and remedied back as close as possible prior to the start of the project.
- 5) Soil samples and pictures should be taken before and after the abandonment and restoration of the area. This would allow the agencies to see the progress and efforts made, to clean up the area as much as possible to its original state.

We thank the NWB for giving us the opportunity to review the spill contingency and abandonment and restoration plans for Mary River Project, Baffinland Iron Mines Corp. Please contact me if you have any further questions or comments.

Sincerely,

Original signed by

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