

JUN-12-03 07:52 From: ENV CAN IQUALUIT NUNAVUT

8969754645

T-660 P.01/03 Job-670

**FACSIMILE MESSAGE****Environment Environnement  
Canada Canada****Environmental Protection Branch  
Qlmugjuk Building 979 P.O. Box 1870  
Iqaluit, NU X0A 0H0****DATE:** June 12, 2003**TO:** Gladys JoudreySn. Environmental Assessment OfficerNunavut Impact Review Board**FROM:** Colette MelocheEnvironmental Assessment SpecialistEnvironment Canada**PHONE:** 867-983-2593**PHONE:** 867-975-4639**FAX:** 867-983-2594**FAX:** 867-975-4645**Number of pages including cover:** 3**Subject:** NIRB 03ER083 / NWB2ASH - Ashton Mining (NWT) Ltd. - Ashton Projects**MESSAGE:**

Hi Gladys,

Please find attached Environment Canada's comments on the above mentioned file. Please don't hesitate to contact me if you have any questions or concerns. Thanks.

Sincerely,

  
Colette Meloche

Environmental Assessment Specialist

0308NWB2ASH Comments to NIRB-ITAE

JUN-12-03 07:52 From: ENV CAN IQALUIT NUNAVUT

8969754645

T-660 P.02/03 Job-870

Environment  
CanadaEnvironnement  
Canada

Environmental Protection Branch  
Qimugjuk Building 969 P.O. Box 1870  
Iqaluit, NU X0A 0H0  
Tel: (867) 975-4639  
Fax: (867) 975-4645

June 12, 2003

Gladys Joudroy  
Sn. Environmental Assessment Officer  
Nunavut Impact Review Board  
P.O. Box 2379  
Cambridge Bay, NU X0B 0C0  
Tel: (867) 983-2593  
Fax: (867) 983-2594

Our file: 4703 001 005  
4703 001 013  
4703 001 037  
4703 001 047

Via Facsimile

**RE: NIRB 03ER083 – Ashton Mining (NWT) Ltd. – Ashton Projects, Kitikmeot Region**

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*.

Ashton Mining (NWT) Ltd. has applied for a water licence renewal in order to carry out diamond exploration in the Kitikmeot region. The licence application is seeking to consolidate all of Ashton's current water licences (NWB2EOK0103, NWB2KIGU002, NWB2KLA0103, NWB2RIC0205, and NWB2VAM0105) and land use permits into one licence. The proposed work will include the use of three (3) camps, which will each have a capacity of 8-12 people. Exploration activities will include mapping, prospecting, and drilling. The work is proposed to occur from June 1, 2003 to June 1, 2006.

When available, EC requires the following information in order to facilitate the review of this application:

- A detailed map indicating the location of the drill holes, especially in relation to water.
- A map detailing the location of the fuel caches, especially in relation to water.

Environment Canada recommends that the following conditions be applied throughout all phases of the project:

- The proponent shall not deposit, nor permit the deposit of any fuel, drill cuttings, chemicals, wastes or sediment into any water body. According to the *Fisheries Act*, Section 36(3), the deposition of deleterious substances of any type in water frequented by fish, or in any place under any conditions where the deleterious substance, or any other deleterious substance that results from the deposit of the deleterious substance, may enter any such water, is prohibited.
- For "on-ice" drilling, return water released must be non-toxic, and not result in an increase in total suspended solids in the immediate receiving waters above the Canadian Council of Ministers for the Environment Guidelines for the Protection of Freshwater Aquatic Life (i.e. 10mg/L for lakes with background levels under 100 mg/L, or 10% for those above 100mg/L).
- Drilling additives or muds shall not be used in connection with holes drilled through lake ice unless they are re-circulated or contained such that they do not enter the water, or demonstrated to be non-toxic.

Enclage Page 1 of 1 (03-06-2003)



JUN-12-03 07:53 From:ENV CAN IQALUIT NUNAVUT

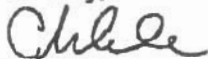
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T-660 P.03/03 Job-670

- Environment Canada would like to inform the proponent that the *Canadian Environmental Protection Act* has recently listed CaCl as a toxic substance. The proponent shall therefore ensure that if CaCl is used as a drill additive, all sumps containing CaCl are properly constructed and located in such a manner as to ensure that the contents will not enter any water body.
- Environment Canada recommends that all drilling wastes be contained in a sump in order to ensure the prevent contamination of the surrounding environment. All drills sumps shall be located above the high water mark of any water body and located in such a way as to prevent the contents from entering any water body frequently by fish. Further, all drill sumps shall be backfilled at the completion of the program and contoured to match the existing landscape.
- All fuel caches shall be located above the high water mark of any definable waterbody and in such a manner as to prevent the contents from entering any waterbody frequented by fish.
- Rather than relying on natural depressions, Environment Canada requests that when storing barreled fuel on location, secondary containment such as self supporting installments be used.
- The proponent shall not store materials or erect camps on the surface ice of lakes or streams, except for immediate use.
- Drip pans, or other such preventative measures, should be used when refuelling equipment on site.
- If an artesian flow is encountered, the drill hole shall be immediately plugged and permanently sealed.
- All sumps, including those for camp sewage, graywater, and drill cuttings, shall be located above the high water mark of any waterbody and in such a manner as to prevent the contents from entering any water frequented by fish, irrespective of the actual distance from the water.
- All sumps shall be backfilled at the end of each field season, and contoured to match the existing landscape.
- **ALL SPILLS** shall be documented and reported to the NWT 24 hr Spill Response Line at (867) 920-8130.
- Environment Canada recommends the use of an approved incinerator for the disposal of combustible camp wastes.

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 with any questions or comments with regards to the foregoing at (867) 975-4639 or by email at [colette.meloche@ec.gc.ca](mailto:colette.meloche@ec.gc.ca).

Yours truly,

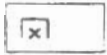


Colette Meloche  
Environmental Assessment Specialist

cc: (Mike Fournier, Northern Environmental Assessment Coordinator, Environment Canada, Yellowknife)

**Gladys Joudrey**

**From:** CritchS@DFO-MPO.GC.CA  
**Sent:** June 19, 2003 1:12 PM  
**Cc:** nwblic@polarnet.ca; PelleyK@arctic.ca; gladys@polarnet.ca  
**Subject:** Water use application for exploratory drilling & base camps for the Ashton Mining Kitikmeot Region exploration areas



Fisheries  
and  
Oceans

Pêches  
et Océans

Fish Habitat Management  
P.O. Box 358  
Iqaluit, Nunavut  
X0A 0H0

Your file *Votre référence*

NWB:  
NWB2ASH

NU03417  
Our file *Notre référence*

David Willis  
Land Administrator  
Ashton Mining (Northwest Territories) Ltd.  
Unit 123 - 930 West 1st Street  
North Vancouver, British Columbia V7P 3N4  
Fax: 604-987-7107

**RE: Water use application for exploratory drilling & base camps for the Ashton Mining Kitikmeot Region exploration areas**

Dear Mr. Willis:

This letter is to advise that The Department of Fisheries and Oceans, Fish Habitat Management (DFO-FHM) received the above-mentioned water use application for a camp and exploratory drilling. DFO-FHM's assessment takes into consideration primarily fish and fish habitat related concerns. I have reviewed the plans for the proposed work.

As I understand it from the application, this is a multi-year exploration program that runs from September 2003 to September 2006. The exploration property is located near Kugluktuk, Nunavut, and includes four temporary 6 -12 person tent camps. Geological mapping, prospecting, and both land-based and ice diamond drilling will be conducted.

Field operations in or near water may result in the harmful alteration, disruption or destruction of fish habitat, which is prohibited under Section 35 of the *Fisheries Act*. The following mitigation measures, in addition to the measures set out in the project proposal, are intended to prevent any potentially harmful impacts to fish and fish habitat:

- If artesian flow is encountered, drill holes should be immediately plugged and permanently sealed.
- All disturbed areas should be stabilized and re-vegetated, as required, upon completion of work to prevent sedimentation.
- No material should be left on the ice when there is potential for that material to enter the water (i.e. spring break-up).
- If drilling requires water in sufficient volume that the source waterbody may be drawn down please submit details (volume required, size of waterbody, etc.) to DFO-FHM for review. DFO-FHM does not recommend the use of streams as a water source.
- All water intakes should be properly screened to prevent the entrainment of fish. Refer to the *Freshwater Intake End-of-Pipe Fish Screen Guideline* (DFO 1995), available on request. DFO recommends a maximum screen opening of 2mm.

Depositing deleterious substances into fish bearing waters is prohibited as stated under Subsection 36(3) of the *Fisheries Act*. The following are additional measures to mitigate habitat disturbance or loss as well as the deposition of deleterious substances.

- Sediment and erosion control measures should be implemented prior to, and maintained during the work to prevent sediment entry into the water during a spring thaw.
- All plans for proposed stream crossings or work conducted below the high water mark adjacent to the banks of streams and lakes require prior approval by DFO-HM.
- All wastes, drill cuttings, sewage containments, and fuel caches should be located at an appropriate distance from the normal high water mark of any water body, and be sufficiently bermed or otherwise contained to ensure that these substances do not enter any water body.

- Drill cuttings should be disposed of in a sump such that they do not enter any water body. The use of biodegradable, salt free drill additives is encouraged over non-biodegradable types.
- All activities, including maintenance procedures and refuelling, should be controlled to prevent the entry of petroleum products or other deleterious substances into the water.
- All spills of oil, fuel, or other deleterious material should be reported immediately to the 24-Hour Spill Line at (867) 920-8130.

If the proposed work is carried out as described in the plans provided to DFO-FHM and if the additional mitigation measures specified above are implemented, the proposed work will not be considered as contravening Subsection 35(1) of the *Fisheries Act* which reads:

*"No person shall carry on any work or undertaking that results in the harmful alteration, disruption or destruction of fish habitat."*

Therefore, an authorization under Subsection 35(2) of the *Fisheries Act* will not be necessary. If a harmful alteration, disruption or destruction of fish habitat and/or the deposition of deleterious substances into fish bearing waters occurs as a result of a change in the plans for the proposed works or failure to implement the additional mitigation measures specified above, prosecution under Subsection 35(1) and/or Subsection 36(3) of the *Fisheries Act* may be initiated.

If you have any questions concerning the mitigation measures or should there be any changes to the proposed work, please contact me at (867) 979-8007 or by fax at (867) 979-8039.

Sincerely,

Stephanie Critch  
Habitat Biologist  
Fish Habitat Management  
Department of Fisheries and Oceans - Eastern Arctic Area

c.c. Phyllis Beaulieu - A/Licensing Administrator, NWB  
Gladys Joudrey - Environmental Assessment Officer, NIRB  
Keith Pelly - Field Supervisor, DFO



P.O. BOX 16  
CAMBRIDGE BAY  
NU X0B 0C0  
Ph: 867-983-2337  
Fax: 867-983-2193



June 18, 2003

Nunavut Impact Review Board  
Box 2379  
Cambridge Bay, NU  
X0B 0C0

**Re: Ashton Projects - file#03ER083**

Further to the above, Mayor and Council of the Hamlet of Cambridge Bay wish to advise that they **Support the above noted application** and would ask that the following comments be duly noted.

- 1) That the project site is inspected annually to insure that all waste disposal and fuel storage requirements are strictly adhered to.
- 2) That traditional land use not be impeded or discouraged.
- 3) That all Archeological Sites and all Artifacts be identified documented and preserved at their original site and in their original state.
- 4) That at the completion of the project a summary report of the project along with photographs wherever and whenever possible be provided to the Elders and the Mayor and Council of the Hamlet of Cambridge Bay in order that the paper work maybe archived.
- 5) Employees to be hired should be from within the Kitikmeot Region and wherever possible, are beneficiaries of the Nunavut Land Claims.

We trust the above will be to your satisfaction however should you have any questions or concerns please do not hesitate to contact the undersigned.

Sincerely,

A handwritten signature in black ink, appearing to read "Mark Calliou".

Mark Calliou  
Sr. Administrative Officer

MC/mm



Indian, and Northern  
Affairs  
[www.inac.gc.ca](http://www.inac.gc.ca)

Affaires indiennes  
et du Nord  
[www.aic.gc.ca](http://www.aic.gc.ca)

Water Resources Division  
Qimugjuk Building  
P.O. Box 2200  
Iqaluit, Nunavut  
X0A 0H0

référence

June 2, 2003

Rita Becker  
Manager - Finance, Licensing and Administration  
Nunavut Water Board  
P.O. Box 119  
Gjoa Haven, NT  
X0E 1J0

Dear Ms. Becker:

On behalf of Indian and Northern Affairs Canada (INAC), I have reviewed the water licence application submitted by Ashton Mining (NWT) Limited. Although I understand the applicant's reasoning for requesting that their five water licences be combined into a single licence, I am not supportive of this approach. At the present time, the Nunavut Water Board (NWB) requires that all uses of water and deposits of waste require a water licence and there is no guidance to applicants to clarify how these requirements apply to a series of camps. The total amount of water used and waste deposited at the five camps is fairly small; however, in the interest of maintaining a consistent approach, the water licences should remain separate. If the Board chooses to combine the water licences into one instrument, I suggest producing instructions or guidelines for applicants to ensure this provision is clear.

An alternative to consolidating the licences is to reduce the number of camps and the area impacted by exploration activity. The impact of one exploration camp may be insignificant but, the cumulative impact of several camps in a watershed may lead to a negative environmental impacts. Companies should be cognizant of cumulative effects when they are designing their exploration programs. In this application, four campsites were listed but the supplementary questionnaire states that "the camp is intended to house approximately six to 12 people" and that "one spill kit will be located at the camp". From this one would assume that each camp will accommodate approximately 12 people and will contain a spill kit, and that the plans provided apply to each site.

In addition to these considerations, the following list outlines recommended conditions that should be incorporated into the water licence(s) to prevent any potential impacts on water. These are generally consistent with the conditions of land use permits issued by INAC.

Canada

Your file - Votre

NWB2ASH

Our file - Notre référence



...2

- All waste disposal areas, sewage treatment facilities, grey water sumps, and fuel caches should be located a minimum of 30 metres from the normal high water mark of any water body, and be sufficiently bermed or otherwise contained to ensure that deleterious substances do not enter any water bodies.
- All sumps should be backfilled and properly restored prior to leaving the site.
- All noncombustible garbage should be stored/disposed of in an approved disposal site. For a small camp, the most appropriate method is likely the removal of non-combustible waste from the site.
- Hazardous waste, such as petroleum or batteries, should be segregated from the domestic waste and stored/disposed of in an appropriate manner. As with noncombustible waste, the most appropriate method for a small camp is likely the removal of hazardous waste from the site.
- The camp should have an appropriate spill contingency plan as well as an abandonment and restoration plan for the dismantling of the camp. These plans should include provisions for the water treatment and waste disposal facilities.
- All spills of oil, fuel, or other deleterious substances should be immediately reported to the 24-Hour Spill Line at (867) 920-8130. The spill should also be reported to INAC's Water Resource Officer at (867) 975-4298, and a report should be provided with the follow-up measure taken to remediate the spill.

The applicant stated that they did not notify nearby communities and potentially interested parties about the proposed work because the operations are "at the exploratory "fly camp" stage and do not warrant consultation". Based on the proximity of the four camps to the Hamlet of Kugluktuk, providing notice to the community is recommended.

Should you have any questions or comments, please do not hesitate to contact me at (867) 975-4548 or by e-mail at [mcchristiem@inac.gc.ca](mailto:mcchristiem@inac.gc.ca).

Sincerely,

*Original signed by:*

Michelle McChristie  
Manager, Water Resources

c.c.: Nunavut Impact Review Board



08/04/2003 WED 13:59 FAX 867 982 3311 KIA

30-May-2003 10:18am From-Nunavut Impact Review Board

8079832574

T-304 P.002/003 F-181

## COMMENT FORM FOR NIRB SCREENINGS

The Nunavut Impact Review Board has a mandate to protect the integrity of the ecosystem for the existing and future residents of Nunavut. In order to assess the environmental and socio-economic impacts of the project proposals, NIRB would like to hear your concerns, comments and suggestions about the following project application:

Project Title: Ashton Projects  
Proponent: Ashton Mining (NWT) Ltd.  
Location: West Kitikmeot, Nunavut  
Comments Due By: Wednesday, June 18, 2003 NIRB #: 03ER083

## Indicate your concerns about the project proposal below:

- |   |   |
|---|---|
| <input checked="" type="checkbox"/> no concerns           | <input type="checkbox"/> traditional uses of land               |
| <input type="checkbox"/> water quality                    | <input type="checkbox"/> Inuit harvesting activities            |
| <input type="checkbox"/> terrain                          | <input type="checkbox"/> community involvement and consultation |
| <input type="checkbox"/> air quality                      | <input type="checkbox"/> local development in the area          |
| <input type="checkbox"/> wildlife and their habitat       | <input type="checkbox"/> tourism in the area                    |
| <input type="checkbox"/> marine mammals and their habitat | <input type="checkbox"/> human health issues                    |
| <input type="checkbox"/> birds and their habitat          | <input type="checkbox"/> other: _____                           |
| <input type="checkbox"/> fish and their habitat           |   |
| <input type="checkbox"/> heritage resources in area       |   |

Please describe the concerns indicated above:

## Do you have any suggestions or recommendations for this application?

Maximize Inuit employment & training. Utilize local Business in Nunavut whenever possible.

Do you support the project proposal? Yes ☒ No ☐ Any additional comments?

Name of person commenting: Geoff Clark of Kugluktuk  
Position: Environmental Screener Organization: Kitikmeot Inuit Association  
Signature: [Signature] Date: June 4/03

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- |   |  |
|---|--|
| <input type="checkbox"/> no concerns                      | <input type="checkbox"/> traditional uses of land                          |
| <input type="checkbox"/> water quality                    | <input type="checkbox"/> Inuit harvesting activities                       |
| <input type="checkbox"/> terrain                          | <input checked="" type="checkbox"/> community involvement and consultation |
| <input type="checkbox"/> air quality                      | <input type="checkbox"/> local development in the area                     |
| <input type="checkbox"/> wildlife and their habitat       | <input type="checkbox"/> tourism in the area                               |
| <input type="checkbox"/> marine mammals and their habitat | <input type="checkbox"/> human health issues                               |
| <input type="checkbox"/> birds and their habitat          | <input type="checkbox"/> other: _____                                      |
| <input type="checkbox"/> fish and their habitat           |  |
| <input type="checkbox"/> heritage resources in area       |  |

Please describe the concerns indicated above:

*See Letter - Very Trembling Attitude on the Part of the Proponent*

Do you have any suggestions or recommendations for this application?

*Consultation at this stage advantageous for both parties.*

Do you support the project proposal? Yes ☐ No ☐ Any additional comments?

*Sound environmental Application but without community awareness through consultation & opportunity of resident involvement, I am reluctant to support*

Name of person commenting: Doug Crossley of Terakridge Bay  
 Position: Special Advisor Organization: CGO  
 Signature: Doug Crossley Date: June 04/03



Gladys Joudrey  
Environmental Assessment Officer  
NIRB - Cambridge Bay

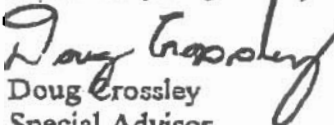
#### Ashton Projects - Kugluktuk Area

I have reviewed this application for a water permit at the 4 separate campsites and although I find the proponent to be environmentally sound throughout this application, their attitude and feeling of not having to involve/consult with adjacent communities at this early stage is quite detrimental and troublesome to me.

There are socio economic advantages to the proponent and opportunities for Northern communities and residents if they can both be fully aware of the projects and the opportunities each might offer towards this project. Shutting out the involvement of the residents at the exploratory stage if this is what the proponent means is a disturbing sign to me anyhow.

I doubt if the residents of Kugluktuk would support an application at this stage if they thought there was little or no chance of involvement and employment for any of their residents.

The proponent should be encouraged to consult with the Kugluktuk Hamlet and the IITO at this early stage as a part of the approval process for their application.

  
Doug Crossley  
Special Advisor  
CG&T - Cambridge Bay