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Department of Environment

Ministère de l'Environnement

July 6, 06

Richard Dwyer
Licensing Trainee
Nunavut Water Board

via Email to: licensingtrainee@nwb.nunavut.ca

RE: NWB2BE-BAK – TANQUERAY RESOURCES LTD. – BAKER LAKE PROJECT WATER LICENSE APPLICATION

Dear Richard:

The Department of Environment (DOE) has reviewed the water license application from Tanqueray Resources Ltd. for conducting gold exploration near Baker Lake, and has the following comments and recommendations.

1. SPILL CONTINGENCY PLAN:

Based on the Government of Nunavut *Spill Contingency Planning and Reporting Regulations* and *A Guide to the Spill Contingency Planning and Reporting Regulations*, the DOE has the following comments to make:

- The name, job title and 24 hour telephone number for the persons responsible for activating the contingency plan should be submitted. This ensures the employee discovering the spill can activate a response and provides a 24 hour point of contact for the authority investigating the spill.

- A description of the facility including the location, size and storage capacity. This is important if persons are unfamiliar with the facility or area. The description could include a map and/or diagrams.

- A site map is intended to illustrate the facility relationship to other areas that may be affected by a spill, and the map should be large enough to include site location, fuel storage facilities, nearby buildings, roads, culverts, drainage patterns, and any nearby bodies of water.

- The quantities of each fuel stored on site should be submitted, and the Material Safety Data Sheet (MSDS) should also be provided for each fuel.

- To prevent spreading in the event of a spill, fuel stored in drums should be located, whenever practical, in a natural depression a minimum distance of 90 feet from all streams, preferably in an area of low permeability. All fuel storage containers should be situated in a manner that allows easy access and removal of containers in the event of leaks or spills. Large fuel caches in excess of 20 drums should be inspected daily.

- The procedures of spill reporting should be included in the spill plan, and the spill should be notified to all parties involved. This can include internal and external reporting procedures as well as a copy of the spill report.

- The means by which the contingency plan is activated should also be outlined in the spill plan, and should include internal company procedures to activate appropriate response equipment and personnel.

- Detailed containment and clean-up techniques for the removal of contaminants from the environment in the case of spills should be included, and the techniques should encompass spill scenarios in various environments such as on land, ice or snow and in water.

- The DOE, Environmental Protection Service (EPS) monitors the movement of hazardous wastes including waste fuel, from generators, carriers to receivers, through a tracking document (Waste Manifest). A Waste Manifest must accompany all movements, and all parties must register with the EPS. There is no mention of this procedure in the spill plan.

- An inventory and the location of response and clean-up equipment available for a spill response should be included in the spill plan. This includes your equipment as well as any to be used by another person responding to the spill on your behalf.

2. ABANDONMENT & RESTORATION (A&R)

Based on the DOE's *Environmental Guideline for Site Remediation,* the DOE has the following recommendations to make:

- Soil contaminated by fuel (e.g. soil under an old storage tank) should be treated on site or removed to an approved disposal site and replaced with new soil. Soils in the vicinity of fuel and/or chemical storage should be tested and disposed off if necessary.

- Drill holes should be backfilled or capped, and be contoured to match the surrounding's landscape to encourage natural re-vegetation at the end of project. The sumps should only be used for inert drilling fluids, not any

other materials or substances, and be properly closed out at the end of a project.

- Final inspections of the entire site should be conducted by the proponent and lead agency to make sure that all areas of the site have been reclaimed as much as possible to its previous condition. Soil Samples and pictures before and after the project would make this process easy on the proponent and leading agencies involved in determining areas of concern.

We thank NWB for giving us the opportunity to review and provide comments on the Tanqueray Resources Ltd. water license application. Please contact us if you have any further questions or comments.

Yours sincerely,

Original signed by

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