



Water Resources
Nunavut Regional Office
P.O. Box 100
Iqaluit, NU, X0A 0H0

NWB file - Votre référence
2BE-BEL1114 - Amendment

AANDC file - Notre référence
IQALUIT - # 524973

May 4, 2012

Phyllis Beaulieu
Manager of Licensing
Nunavut Water Board
P.O. Box 119
Gjoa Haven, NU, X0A 1J0

**Re: Water Licence No. 2BE-BEL1114 – Amendment – Belcher Island
Project – Canadian Orebodies Inc.**

Aboriginal Affairs and Northern Development Canada (AANDC) has performed a review of the amendment application for the Belcher Island Project, water licence number 2BE-BEL1114. The Nunavut Water Board distributed the application for comment on April 10, 2012. The following comments are provided pursuant to AANDC's mandated responsibilities under the *Nunavut Waters and Nunavut Surface Rights Tribunal Act* and the *Department of Indian Affairs and Northern Development Act*.

In conducting this review, I have referred to all documents on the Nunavut Water Board's FTP site as it relates to 2BE-BEL1114. Attached is a Technical Review Memorandum for your consideration.

Please feel free to contact me should you have any questions or comments. I can be reached at 867.975.4566 or by email at Andrea.Cull@aandc-aadnc.gc.ca.

Sincerely,

Originally signed by

Andrea Cull
Pollution Policy Specialist, AANDC

Cc: Murray Ball, Manager of Water Resources, AANDC
Andrew Keim, A/Manager of Field Operations, AANDC

Technical Review Memorandum

To: Phyllis Beaulieu – Manager of Licensing, Nunavut Water Board

From: Andrea Cull – Pollution Policy Specialist, Aboriginal Affairs and Northern Development Canada

Re: Water Licence No. 2BE-BEL1114 – Amendment – Belcher Island Project – Canadian Orebodies Inc.

Background

The West Haig Project is an exploration initiative focused on the iron-ore potential of the Belcher Island.

The current water licence (2BE-BEL1114) allows 10 cubic metres of water use per day (drilling 8 cubic metres and camp 2 cubic metres). This amendment application is asking for the allowance of 160 cubic metres of water use per day (drilling 157 cubic metres and camp 3 cubic metres).

Recommendations/Comments

On behalf of the AANDC Water Resources Division the following comments/recommendations are provided for the Board's consideration,

- **Spill Contingency Plan**

The Spill Contingency Plan should make reference to the Nunavut Spill Report Line and include a copy of the Nunavut Spill Report Form. This form can be obtained from the Nunavut Water Board public registry at <http://www.nunavutwaterboard.org>.

Please note that the 24-hour Spill Report Line telephone number is 867.920.8130 and facsimile number is 867.873.6924. Furthermore, AANDC requests the Proponent report all spills to the Manager of Field Operations/AANDC, by phone at 867.975.4295 and by fax at 867.975.6445, as well as the Nunavut Spill Report Line.

Re/Fueling

AANDC recommends that the licensee have their refueling stations and/or operations no closer than 31 meters from the ordinary high water of any water body, unless otherwise approved by the Board in writing.

- **Waste**

Hazardous Waste

AANDC recommends that Hazardous waste/waste oil materials and hydrocarbon contaminated soil stored on-site should be clearly labeled with labels visible under all conditions and in all seasons. This recommendation is intended to prevent possible damage or misplacement of the containers.

AANDC recommends that the Proponent remove all hazardous materials/waste oil from the site on a regular basis to prevent the over accumulation of these materials. Hazardous waste/waste oils must be disposed of at an approved facility outside of the Territory of Nunavut (no known facilities within Nunavut). All transfer of this type of waste must be in accordance with the GN's "Guideline for General Management of Hazardous Waste - January, 2002". In addition hazardous wastes should be stored within a lined secondary containment structure to prevent any off site impacts (other secured structures would also be acceptable).

AANDC recommends that the Proponent be required to submit copies of all manifest forms related to the transport of hazardous waste/waste oil as part of the Annual Report for this site.

Greywater and Drilling Wastes

AANDC recommends that all sumps for the disposal of grey water or drilling wastes shall be located a minimum distance of 31 metres from any water body and shall be managed to ensure that there are no adverse effects to the quality, quantity and flow of water. Furthermore, all sumps shall be backfilled and contoured to match the surrounding landscape prior to the end of the project.

- **Incineration**

According to Environment Canada's (EC) Technical Document for Batch Waste Incineration Guidelines, there should be no open burning of plastics, wood treated with preservatives, electrical wire, Styrofoam, asbestos or painted wood. This is to prevent the deposition of waste materials from incomplete combustion and/or leachate from contaminated ash residues from affecting any surrounding waters.

EC's Technical Document for Batch Waste Incineration Guidelines recommends that a facility incinerating more than 26 tons of waste per year should do so with a dual chamber, controlled air incinerator. The Proponent shall make determined efforts to achieve compliance with the Canada-Wide

Standards for Dioxins and Furans and the Canada-Wide Standard for Mercury Emissions. Efforts should include the implementation of a comprehensive waste management strategy (especially waste segregation) that is designed to reduce and control the volumes of wastes produced, transported, and requiring disposal.

- **Drilling**

Prior to the commencement of diamond drilling the Proponent shall submit to the Inspector proposed drill targets on a 1:50,000 scale map with the coordinates and map datum.

- **Additional Comments**

AANDC has no additional comments at this time on the amendment application for the Belcher Island Project, water licence number 2BE-BEL1114. Aside from the recommendation/comments made above, AANDC suggests that all existing terms and conditions of the current water licence would be appropriate.

Prepared by Andrea Cull

Cc: Murray Ball, Manager of Water Resources, AANDC
Andrew Keim, A/Manager of Field Operations, AANDC