



Aboriginal Affairs and Northern Development Canada
Nunavut Regional Office
Operations Directorate
P.O. Box 100
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August 16, 2012

Ms. Phyllis Beaulieu
Manager of Licensing
Nunavut Water Board
P.O. Box 119
GJOA HAVEN, NU X0E 1J0

Our reference:
IQALUIT-#555194

Your reference:
2BE-BEL1114

Sent via email

Re: Water Licence 2BE-BEL1114 – Canadian Orebodies Inc. – Belcher Islands Project – Amendment Application No. 2 – Qikiqtani Region

Dear Ms. Beaulieu,

Thank you for your July 17, 2012 request for written representations on the above referenced water licence amendment application.

A Technical Review Memorandum is provided for the Board's consideration. Comments/ recommendations have been provided pursuant to the Department's mandated responsibilities under the *Nunavut Waters and Nunavut Surface Rights Tribunal Act* and the *Department of Indian Affairs and Northern Development Act*.

Please do not hesitate to contact me by telephone at (867) 975-4555 or email at David.Abernethy@aandc-aadnc.gc.ca to discuss this submission.

Regards,

David Abernethy
Regional Coordinator
Water Resources Division

Encl.

c.c.: Murray Ball, Manager of Water Resources

TECHNICAL REVIEW MEMORANDUM

TO	Phyllis Beaulieu Manager of Licensing Nunavut Water Board	OUR REFERENCE File #9545-2-3.2BE.BELA IQALUIT-#555194
FROM	David Abernethy Water Resources Regional Coordinator Aboriginal Affairs and Northern Development Canada	YOUR REFERENCE 2BE-BEL1114 DATE August 16, 2012
SUBJECT	Water Licence 2BE-BEL1114 – Canadian Orebodies Inc. – Belcher Islands Project – Amendment Application No. 2 – Qikiqtani Region	

A. PROJECT DESCRIPTION

On July 16, 2012 the Nunavut Water Board (NWB or Board) distributed to interested parties for review and comment a water licence amendment application that was submitted by Canadian Orebodies Inc. The purpose of this application is to extend the Belcher Island project area to include the Kihl Bay, Wiegand Island, and Kugong Island locations. The current project area spans the Haig West and Haig Inlet locations. Canadian Orebodies Inc. have not requested any changes to their licence terms and conditions with regard to the use of water use or management of waste. The application consists of the following documents:

- Cover email dated June 21, 2012;
- Application for Water Licence Amendment;
- Abandonment and Restoration Plan, including maps and figures;
- Contingency Plan, including maps and figures;
- Project summaries, English and Inuktitut

B. RESULTS OF REVIEW

On behalf of Aboriginal Affairs and Northern Development Canada (AANDC), the following comments/ recommendations are submitted for the Board's consideration,

General

- AANDC are not opposed to the proposed amendment application. The current water licence contains adequate provisions for water use and waste management activities.

Abandonment and Restoration Plan

- AANDC recommends that Canadian Orebodies Inc. revise their submitted Abandonment and Restoration Plan to include detailed provisions for the reclamation of drill holes. Upon completion of drilling casings should be cut at or below ground surface and capped. Depressions around the drill holes, if present, should be contoured to prevent ponding.

Spill Contingency Planning

- The submitted Spill Contingency Plan references Mr. Peter Kusugak as the AANDC Manager of Field Operations, Nunavut Regional Office. It is recommended that this plan be revised to simply reference the position, Manager of Field Operations, Nunavut Regional Office as the departmental contact for reporting hazardous material spills. The contact information specified in Part B, Item 8(b) of the licence is correct.
- AANDC recommends that all fuel storage areas be lined with impermeable liners and bermed to 110% containment. The Spill Contingency Plan submitted with the current application does not include secondary containment provisions.
- AANDC recommends that all fuel caches be stored on land at least 100 m above the high-water mark of any nearby water sources to reduce the risk of fuel spills into water unless expressly authorized in writing by a departmental Water Resource Officer.

Prepared by David Abernethy