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Water Resources
Nunavut Regional Office
P.O. Box 2200
Iqaluit, NU, X0A 0H0
Tel. (867) 975-4555
Email: abernethyd@inac-ainc.gc.ca

Your file - Votre référence
2BE-BKL

Our file - Notre référence
9545-2 / #91893

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Richard Dwyer
Licensing Trainee
Nunavut Water Board
P.O. Box 119
Gjoa Haven, NU X0B 1J0
Tel. (867) 3606338 ext. 20
Email: licensingtrainee@nwb.nunavut.ca

Via Email

Re: 2BE-BKL - De Beers Canada Inc. - Baker Lake Exploration Project - licence application

On behalf of Indian and Northern Affairs Canada (INAC) I have reviewed the above-mentioned application. The following specialist advice has been provided pursuant to INAC's mandated responsibilities for the enforcement of the *Nunavut Waters and Nunavut Surface Rights Tribunal Act* (NW&NSRT), *Arctic Waters Pollution Prevention Act* (AWPPA), and the *Department of Indian Affairs and Northern Development Act* (DIAND Act).

Project Information

De Beers Canada Inc. (De Beers) is applying for a licence for the use of water and disposal of wastes associated with mineral exploration as a part of its Baker Lake Exploration Project. The proponent intends to conduct geological sampling, mapping, staking, geophysical studies, and diamond drilling operations on its property with the aim of locating diamond bearing kimberlite formations. The Baker Lake property is situated in the Kivalliq Region, approximately 120 km southwest of the community of Baker Lake with a general coordinate of 64°17'N, 96°02'W. Project activities will be based out of the Hamlet of Baker Lake and an effort will be made to hire local residents.

De Beers requests the daily use of 1.25 cubic metres of freshwater from local sources to support its drilling operations. Drilling will occur in areas that are at least 30 metres above the high water mark of any nearby water bodies. The proponent has an operations manual titled, *Use and Handling of Water During Exploration Activities*. Within this manual is a section which outlines the procedures that are practiced for the disposal of waste water from drilling activities. This section states that drilling wastes will be directed to settling pits or sediment control structures. Waste oil, hazardous wastes, and general waste products associated with project activities will be delivered to appropriate treatment facilities.

Fuel caches comprising of JET-B fuel, gasoline, and propane will be established within the project area. These fuel caches will be supported by a main fuel cache situated at the Baker Lake airstrip. Large 200 litre spill kits will be mobilized at drill sites, fuel caches, and helicopter landing areas. In addition, a small spill kit will be kept in the helicopter at all times. Spill Contingency and Abandonment and Restoration (A&R) Plans have been made available for review.

INAC Comments

INAC recommends that the Nunavut Water Board consider the following comments when reviewing this licence application.

GENERAL

-INAC is appreciative of De Beers' decision to base its Baker Lake Exploration Project from the Community of Baker Lake. Company representation in this community will provide positive exposure to the mining industry and the economic benefits to Nunavut residents.

-INAC is impressed with the *Use and Handling of Water During Exploration Activities* manual developed by De Beers. This manual outlines good practices for the consumption and treatment of water used drilling operations.

SPILL CONTINGENCY PLAN

-INAC recommends that the Safety, Health, and Environmental Management Representative's contact information be included in its Spill Contingency Plan. This individual is referenced in the Plan as an important contact for reporting major hazardous material spills.

-INAC recommends that the Spill Contingency Plan be revised to include response measures for spills on terrain which is representative of the project area, i.e., land, water, snow, and ice.

-INAC requests that the proponent change its INAC contact information for reporting spills. Peter Kusugak, Manager of Field Operations, should be the INAC contact. Kusugak can be reached by office telephone at (867) 975-4295 and facsimile (867) 979-6445.

-The Spill Contingency Plan should include a list of spill response equipment made available for this project. Particularly, the contents of spill kits should be provided.

-INAC recommends that the proponent provide the coordinates of its selected temporary fuel caches to the Nunavut Water Board once they are known.

-INAC recommends that the Spill Contingency Plan include a copy of the Nunavut Spill Report Form which is posted on the <http://ftp.nunavut.ca/nwb> website.

-INAC suggests that applicable Material Safety Data Sheets be appended to the project's Spill Contingency Plan. Furthermore, copies of the Spill Contingency Plan should be stored in all spill kits.

ABANDONMENT AND RESTORATION

-INAC recommends that the Baker Lake Exploration Project's A&R Plan be revised to include reclamation procedures for drilling sites and areas affected by hazardous material spills.

-The proponent should remove irrelevant aspects from the project's A&R Plan, e.g., assessing the acid generation potential of tailings. A&R Plans should be project-specific and summarize efforts that will be made to reclaim project areas to closely resemble their pre-disturbed state.

DRILLING OPERATIONS

-Drill holes that penetrate below the permafrost layer should be permanently sealed and capped to prevent induced contamination of groundwater or salinization of surface waters due to artesian flows.

-If the proponent penetrates below the permafrost layer, INAC requests that the proponent notify the Nunavut Water Board and itself of permafrost depth for future reference and data management purposes.

Indian and Northern Affairs Canada requests notification of any changes in the proposed project, as further review may be necessary. Please do not hesitate to contact me if you have any questions or comments with regards to the foregoing.
Sincerely,

Original signed

David W. Abernethy
Water Resources Coordinator

cc. Jim Rogers - Manager of Water Resources, Indian and Northern Affairs Canada, Iqaluit
Peter Kusugak - Manager if Field Operations, Indian and Northern Affairs Canada, Iqaluit