

Environment
CanadaEnvironnement
Canada

Environmental Protection Branch
Qimugluk Building, P.O. Box 1870
Iqaluit, NU X0A 0H0
Tel: (867) 976-4839
Fax: (867) 975-4645

February 27, 2002

Rita Becker
Licensing Administrator
Nunavut Water Board
Gjoa Haven, NU X0B 1J0

Our file: 4705-037

Fax: (867) 360-6338

Re: Comments on Application to Amend Water License NWB2BRO0101 - Kennecott Canada Exploration Inc. - Mineral Exploration Camp on the Brodeur Peninsula, Baffin, NU.

On behalf of Environment Canada (EC), I have reviewed the above noted amendment to water license NWB2BRO0101. The following recommendations have been made in regards to Environment Canada mandated responsibilities for the enforcement of the *Canadian Environmental Protection Act (CEPA)*, section 36 of the *Fisheries Act*, the *Canadian Wildlife Act*, and the *Migratory Birds Convention Act*.

Kennecott Canada Exploration Inc. has proposed to amend present water license to include exploratory drilling on the Brodeur Peninsula, Baffin Island. A total of 20 holes will be drilled during May 1 to December 31, 2002.

Comments and Recommendations

Wildlife Concerns

Environment Canada has reviewed the sensitivities to bird concerns, notably Ivory Gull colonies (a species of concern designated by COESWIC April, 1996). The proposed campsite locations are south of the known Ivory Gull colonies, but some of the survey area overlap the known sites. Ivory Gull colonies are usually "obvious", as they nest on cliffs or mountain tops, with little or no vegetation. They are conspicuous white dots on the landscape, and usually fly up when disturbed. Environment Canada strongly recommends that the proponent avoid known colony sites, keeping altitudes of at least 1500 feet, and report any locations where they observe these birds.

The proponent neglected to:

- state that "all spills" are to be documented and reported to the NWT Spill line (867) 920-8130;
- provide a list of all hazardous materials that may be used during the program;
- indicate if spill kits are to be used at fueling and fuel storage areas;
- indicate if new campsites are to be established;
- provide estimates of the volumes of fuel to be stored;
- provide the location of fuel storage in relation to water;
- provide the location of drill holes in relation to water;
- indicate where drill cutting and drill additives are to be disposed of.

The following conditions should be applied throughout all phases of the project.

- The proponent shall ensure that any drill cuttings, chemicals, fuel or wastes associated with the proposed project do not enter waters frequented by fish.



Canada

- EC encourages proponents, when storing barreled fuel at a location, to use a secondary containment rather than relying on "natural depressions". Self supporting insta-berms are available from various suppliers within Canada.
- No disturbance of the bed or banks of any definable watercourse is permitted. Special efforts must be made to avoid bed and bank disturbance during the spring.
- Ensure the treatment of hazardous and solid wastes at an appropriate disposal facility ie. Yellowknife or Rankin Inlet;
- Environment Canada recommends the use of an approved incinerator.
- The permittee shall not erect camps or store material on the surface ice of streams or lakes.

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 lawrence.ignace@ec.gc.ca.

Yours Truly,



Lawrence Ignace
Environmental Assessment Specialist

cc: (Paula Pacholek, Northern Environmental Assessment Coordinator, Yellowknife)
(Mark Mallory, CWS, Iqaluit)