

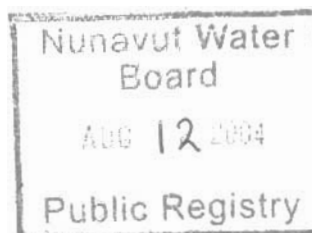


Environment Environnement
Canada Canada

Environmental Protection Branch
Suite 301, 5204 - 50th Avenue
Yellowknife, NT, X1A 1E2

August 12, 2004

Licensing Administrator
Nunavut Water Board
P. O. Box 119
Gjoa Haven, NU
X0B 1J0



Our file: 4703 001 035

Via facsimile

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**Re: NWB2BRO – Spill Contingency Plan and Abandonment and Reclamation Plan, Brodeur Peninsula
Proponent – Kennecott Canada Exploration Inc.**

On behalf of Environment Canada (EC), I have reviewed the information submitted with the above-mentioned application. The following comments are provided pursuant to Environment Canada's mandated responsibilities for the enforcement of the *Canadian Environmental Protection Act*, Section 36(3) of the *Fisheries Act*, the *Migratory Birds Convention Act*, and the *Species at Risk Act*.

Kennecott Canada Exploration Inc. has submitted a Spill Contingency Plan and an Abandonment and Reclamation Plan for all of their operations in the Northwest Territories and Nunavut. The Plans are submitted as attachments to Kennecott's Nunavut Water Board Application for water use on the Brodeur Peninsula Project.

Environment Canada has reviewed the submitted Plans and has the following recommendations and comments:

1. Any sumps, pits, spill basins and fuel caches shall be located above the high water mark of any waterbody and in such a manner as to prevent the contents from entering any waterbody frequented by fish. Therefore, please note that maintaining a buffer of a specific distance may not always be an adequate preventative measure.
2. Environment Canada recommends the use of secondary containment with an impervious liner, such as self-supporting insta-berms, for storage of all barreled fuel rather than relying on natural depressions to contain spills.
3. The proponent shall ensure that all hazardous wastes, including waste oil, receive proper treatment and disposal at an approved facility.
4. Environment Canada recommends the use of an approved incinerator for the disposal of combustible material.
5. All non-combustible solid wastes (e.g., potable water bottles) shall be disposed of at an appropriate facility, i.e., Yellowknife, NWT or Iqaluit, NU. The proponent is encouraged to make use of recycling facilities for all recyclable materials.
6. Spill kits, shovels, barrels, sorbents, pumps, etc. shall be consistently maintained and readily available onsite.
7. In *Section 8.0. Resource Inventory*, the proponent indicates that "...hand tools, and miscellaneous equipment,...are available from competitors' exploration sites...". Please ensure that resources are available from suggested sources and that logistical planning is done well in advance for use of off-site resources. I.e., ensure that other exploration camps and Hamlets are prepared for equipment requests, and that aspects such as transportation availability are planned.

If there are any changes in the submitted Plans, EC should be notified, as further review may be necessary. Please do not hesitate to contact me with any questions or comments with regards to the foregoing at (867) 669-4708 or by email at ivy.stone@ec.gc.ca.

Sincerely,

Ivy Stone
Environmental Assessment

cc: Steve Harbicht (Head, Assessment & Monitoring, EPB, Environment Canada, Yellowknife, NT)
Mike Fournier (Environmental Assessment Coordinator, ECB, Environment Canada, Yellowknife, NT)