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Department of Environment

Ministère de l'Environnement

May 19, 06

Richard Dwyer Licensing Trainee Nunavut Water Board

via Email to: licensingtrainee@nwb.nunavut.ca

RE: NWB2BE-CAN – STRONGBOW GOLD & BASE METAL EXPLORATION WATER LICENSE APPLICATION

Dear Richard:

The Department of Environment (DOE) has reviewed the water license application from Strongbow Exploration Inc. for conducting exploratory drilling for gold and base metal, and has the following comments and recommendations.

1. SPILL CONTINGENCY PLAN:

Based on the Government of Nunavut Spill Contingency Planning and Reporting Regulations and A Guide to the Spill Contingency Planning and Reporting Regulations, the DOE has the following comments to make:

- An updated map that will be submitted at a later date by the proponent, should be large enough to include site location, nearby buildings, roads, culverts, drainage patterns, and any nearby bodies of water.
- All fuel storage containers should be situated in a manner that allows easy
 access and removal of containers in the event of leaks or spills. Large
 fuel caches in excess of 20 drums should be inspected daily.
- Detailed clean-up techniques for the removal of contaminants in the events of spills in different environments (i.e. on land, on snow, on ice or in water) should be included.
- The DOE, Environmental Protection Service (EPS) monitors the movement of hazardous wastes, from generators, carriers to receivers, through a tracking document (Waste Manifest). A Waste Manifest must accompany all movements, and all parties must register with the EPS. There is no mention of this procedure in the spill plan.

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2. WILDLIFE

Bear-People Conflicts

The operation is in an area where grizzly bears may be encountered. Proper food handling and garbage disposal procedures should be followed to reduce the likelihood that bears will be attracted to the operation. Careful planning and attention to details of camp design and maintenance will decrease the attraction of bears to camp.

The applicant should follow procedures outlined in the "Safety in Bear Country Manual", and should contact the Regional/Area Biologist or the Wildlife manager indicated below for information and advice on measures which should be taken to minimize the possibility of bear-people conflicts.

Muskoxen Protection Measures

Extra efforts should be done to avoid disturbance of muskoxen groups as a survey from last year shows low abundance and poor reproduction of muskoxen in the area.

Low Level Flights

Aircraft activities with no specific requirements for low level flying should be restricted to a minimum altitude of 300m above ground level, to minimize wildlife disturbance.

DoE Contacts

Manager, Wildlife

- Monica Angohiatok, (867) 982-7441, mangohiatok@gov.nu.ca Wildlife Officer, Kitikmeot Region
- Allen Niptanatiak (867) 982-7451, <u>allennip@polarnet.ca</u> Regional Biologist
 - Mathieu Dumond, (867) 982-7444, mdumond@gov.nu.ca

We thank NWB for giving us the opportunity to review and provide comments on the Strongbow's water license application. Please contact us if you have any further questions or comments.

Yours sincerely,

Original signed by

Helen Yeh
Environmental Assessment Coordinator
Environmental Protection Service
Department of Environment
Government of Nunavut



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