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Nunavut Regional Office
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Your file - Votre référence
2BE-CAN
Our file - Notre référence
IQA-N 9545-1-2-CANG

May 26th, 2006

Phyllis Beaulieu
Licensing Administrator
Nunavut Water Board
P.O. Box 119
Gjoa Haven, NU, X0A 1J0

Re: 2BE-CAN -Strongbow Exploration Inc.- Canoe Lake Project - Water License Renewal Application

On behalf of the Department of Indian Affairs and Norther Development (DIAND), I have reviewed the Water License Renewal Application, submitted by Strongbow Exploration Inc. with respect to the Canoe Lake Project.

In the Abandonment and Restoration Plan, under Description of Facility, the location of fuel is discussed. The Abandonment and Restoration Plan mentions that fuel will be stored at a safe distance (>100m) from water bodies. However, there is no mention of the high water mark with regards to fuel storage. In observing Water license NWB2CAN0406, Part G, Item 4 states that "all sumps and fuel caches shall be located a minimum of 30 meters from the normal high water mark of any adjacent water body." Thus, it is suggested that this provision is adopted to ensure the safe storage of any fuel kept on site.

Under the Description of Facility in the Abandonment and Restoration Plan, there is an incomplete sentence which reads " Maximum fuel storage will be 4 drums (820L) of diesel and 2 drums of Jet B (410), plus one (1) 100lb propane tank and several cases of..." It is important that this substance is identified and that it is recognized in the Material Safety Data Sheets.

Under Storage Location of the Description of Facility in the Abandonment and Restoration Plan there should be mention of proximity to the high water mark of adjacent water bodies, i.e. >30 meters distance.

In looking at the Spill Response Plan, under Detailed Response Plan, Section (c) Locations; there should be mention of proximity to the high water mark of adjacent water bodies, i.e. >30 meters distance.

Moving further into the Spill Response Plan, under Detailed Response Plan, Section (e) Preventative Measures, there is discussion about the use of superfluous fuel

drums should a leak occur. Is there a formal convention employed to determine the number if excess drums required based on the given amount of fuel on hand? If so, what this number is and how it was derived should be mentioned.

In the Spill Response Plan, under Detailed Response Plan, Section (e) Containment there is a list of containment techniques. Are any of these techniques going to be applied to the site as a preventative measure or are these purely reactionary techniques?

The Supplementary Questionnaire, Section 32, describes the characteristics, quantities, treatment and disposal methods for camp sewage. It is important to note that Water License NWB2CAN0406 Part D, Item 5 states "that all sewage should be discharged into latrine pits located at least thirty (30) meters from the high water mark of any water body. These latrine pits shall be treated with lime and covered with 0.5 m of native material prior to abandonment". Furthermore, INAC requests that back filled areas be contoured to promote surface water runoff away from the sump surface. These conditions should be taken into account with respect to waste treatment and disposal.

The Supplementary Questionnaire, Section 35, requires a description of the location, dimension, volume and freeboard for sumps. Although location is discussed, there is no mention of dimension, volume and freeboard for sumps.

Also, the proponent should update their Spill Contingency Plan to included Mr. Peter Kusugak, (867) 975-4295 as their INAC contact.

Should you have any questions or comments, please do not hesitate to contact me at (867) 975-4548 or by email at BathoryS@ainc-ianc.gc.ca.

Sincerely,

Original signed by

Stephen Bathory
Regional Coordinator