



Environmental Protection Operations Directorate
Prairie & Northern Region
9250 – 49th 1st Street NW
Edmonton, AB
T6B 1K5

ECCC File: 6100 000 035/005
NWB File: 2BE-CHI1218

March 29, 2018

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

Dear Mr. Dwyer:

RE: 2BE-CHI1218 – Water Licence Renewal Application Chidliak Project

Environment and Climate Change Canada (ECCC) has reviewed the information submitted to the Nunavut Water Board (NWB) regarding the above-mentioned amendment application and is submitting comments as requested by NWB. ECCC's specialist advice is provided based on our mandate, in the context of the *Canadian Environmental Protection Act*, and the pollution prevention provisions of the *Fisheries Act*.

Please find the following comment below:

1. In the Bulk Sampling Monitoring Plan under the Cutting Disposal Location on Page 5, trenches CH-6, CH-7, and Cuttings Containment Area 2 are identified to be used in storage of drill cuttings. The plan indicates that at CH-7 "any released water is slowly filtered through the rock rubble at the base of the containment area." While at Cuttings Containment Area 2 a "snow berm is required when cuttings are deposited and the cuttings then thaw slowly over spring with water infiltrating into the soils."

No description of water management is provided for CH-6 and no description of water quality monitoring is provided for any of the storage sites. Based on photos provided in the previous CH-06 Trench Water Monitoring Report (2016), it appears that water collected in CH-6 is discharging from the trench to the receiving environment. However, no similar photos are provided for CH-7 or Cuttings Containment Area 2.

ECCC recommends that the proponent:

- a. Provide a description of all the water quality monitoring stations within the Chidliak project, this includes Ch-6, authorized water sources, Sunrise Lake West, "Y" Lake, and Deep Hole McKeand River.
- b. Identify how locations with the potential to collect and discharge water (trenches, drilling, excavations, and drill waste disposal areas) are monitored to ensure that water is captured and tested prior to release.
- c. Identify the distance between water collection locations from surface water.

Should you require further information, please do not hesitate to contact me at 780-951-8851 or petrel.liu@canada.ca.

Sincerely,

A handwritten signature in black ink, appearing to read 'Petrel', with a stylized flourish at the end.

Petrel Liu
Environmental Assessment Intern

cc: Georgina Williston, Head, Environmental Assessment North (NT and NU)