

ባራሀር ሆን የል

Avatiligiyiit

Department of Environment

Ministère de l'Environnement

Feb. 14, 06

Richard Dwyer Licensing Trainee Nunavut Water Board

via Email to: licensingtrainee@nwb.nunavut.ca

RE: NWB2FER0507 – FERGUSON LAKE EXPLORATORY DRILLING WATER LICENSE AMENDMENT APPLICATION

Dear Richard:

The Department of Environment (DOE) has reviewed the water license amendment application from Starfield Resources Inc. for conducting an exploratory drilling (for nickel, copper, palladium and platinum) near Ferguson Lake, 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:

- The site map submitted is not sufficient in details. A site map is intended
 to illustrate the facility relationship to other areas that may be affected by a
 spill. The map should be large enough to include site location, nearby
 buildings, roads, culverts, drainage patterns, and any nearby bodies of
 water.
- A sound spill training program is necessary and is required to provide to spill response employees. There is no mention of the training in the spill plan.
- 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.

PH: (867) 975-7733

FX: (867) 975-7739

2. ABANDONMENT & RESTORATION PLAN

Based on the DOE's *Environmental Guideline for Site Remediation*, the DOE has the following recommendations to make:

- A site map should be included within the A&R plan, and it should indicate
 the locations of fuel and chemical storage facilities, nearby buildings, drill
 sites and UTM coordinates with respect to nearby communities.
- The proponent contact information and emergency contact information should be included in the plan. There is no mention of this in the plan.
- The plan should also include information of fuel and chemical quantities brought on site, in addition to any fuel and chemicals left on site.
- A Waste Manifest must accompany all movements of hazardous wastes, and all parties must register with the EPS. There is no mention of this procedure in the spill plan.
- Soil contaminated by fuel near storage tanks should be treated on site or removed to an approved disposal facility and replaced with new soil.
 There is no mention of this procedure in the plan.

3. WILDLIFE

The exploratory site situates at the Qamanirjuak Calving Area, and there will be potential caribou calving activities near the project site. The DOE recommends the proponent to follow instructions below if calving activities are observed.

The period between May 15 and July 15 is the normal caribou calving season. The applicant is advised to suspend all operations, particularly blasting, overflights by aircraft at any altitude of less than 300 meters above ground level, and the use of snowmobiles and ATV's (all-terrain vehicles) outside the immediate vicinity of the camp. In addition, all personnel should remain quietly in the camp when caribou are in the area.

We thank NWB for giving us the opportunity to review and provide comments on the Starfield's water license amendment application near Ferguson Lake. 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
P.O. Box 1000, Stn. 1360
Iqaluit, Nu X0A 0H0

PH: (867) 975-7733 FX: (867) 975-7739 EM: hyeh@gov.nu.ca

