Water Resources Division Resource Management Directorate Nunavut Regional Office P.O. Box 100 Iqaluit, NU, X0A 0H0

> Your file - Votre référence 2BE-GEO1520 Our file - Notre référence CIDM#1283490

February 28, 2020

Mr. Richard Dwyer
Manager of Licensing
Nunavut Water Board
P.O. Box 119
Gjoa Haven, NU, X0B 1J0
E-mail: licensing@nwb-oen.ca

Re: Crown-Indigenous Relations and Northern Affairs Canada's comments on 2BE-GEO1520 Water Licence Renewal Application

Dear Mr. Dwyer,

Thank you for your January 29, 2020 email invitation to review and comment on the above-referenced water licence renewal application.

Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC) reviewed the submitted application documents, pursuant to its mandated responsibilities under the *Nunavut Waters and Nunavut Surface Rights Tribunal Act* and the *Department of Crown-Indigenous Relations and Northern Affairs Act*, and would like to provide the following comments to the Nunavut Water Board for consideration.

Section 2.2 of the *Comprehensive Spill Contingency Plan* described how various types of waste water (e.g., domestic greywater, sewage, and contact water from fuel secondary containment berms) will be managed. The application requested a maximum quantity of one hundred and thirty (130) cubic meters per day of water for drilling. CIRNAC notes, however, the absence of information on how drilling fluids or wastes will be managed. CIRNAC further notes that the Nunavut Impact Review Board, in its screening decision report dated May 15, 2006, required the licensee to comply with a number of specific terms and conditions on the management of the drill sites and drilling wastes.

CIRNAC recommends that the *Comprehensive Spill Contingency Plan* be updated to include details of the management of drilling fluids or wastes.





CIRNAC appreciates the opportunity to participate in this review. If there is any question, please contact me at (867) 975-4555 or david.zhong@canada.ca or Mr. Godwin Okonkwo, Manager of Water Resources, at (867) 975-4550 or godwin.okonkwo@canada.ca.

Sincerely,

David Zhong Regulatory and Science Advisor

