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Department of Environment

Ministère de l'Environnement

Oct. 4, 05

Phyllis Beaulieu
Manager of Licensing
Nunavut Water Board

via Email to: licensing@nwb.nunavut.ca

**RE: NWB2HEE0507- DIAMONDEX RESOURCES LTD. WATER LICENSE
AMENDMENT APPLICATION**

Dear Phyllis:

The Department of Environment (DOE) has reviewed the water license amendment application from Diamondex Resources Ltd. for operating a diamond exploration project on Heequo Property near Takiyuak Lake, and has the following comments and recommendations.

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 description of the site is insufficient, and it should include not only the location, but also the size and storage capacity.
- The site map is inadequate, and should be included within the plan. It is intended to illustrate the site in relation to other areas that may be affected by the spill, and the scale of the map should be large enough to include the site, nearby facilities, roads, culverts, drainage patterns, and any nearby bodies of water.
- The fuel and chemical storage plan is insufficient, and should include the following notes. To prevent spreading in the event of a spill, fuel and chemicals should be stored in a natural depression a minimum distance of 90 feet from all streams, preferably in an area of low permeability. 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.
- The DOE, Environmental Protection Service (EPS) monitors the movement of hazardous waste, from the generator, carrier to the final disposal, 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.
 - The disposal plan is inadequate, and it should include the location of disposal sites approved to accept wastes.

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

Yours sincerely,

Original signed by

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