



Indian and Northern
Affairs Canada
www.inac.gc.ca

Affaires indiennes
et du Nord Canada
www.ainc.gc.ca

Water Resources
Nunavut Regional Office
Iqaluit, NU X0A 0H0

Your file - Votre référence
2BE-HOP

Our file - Notre référence

April 25, 2007

File no. 9545-1-2HOPG / CIDMS no. 142724

Richard Dwyer
Licensing Trainee
Nunavut Water Board
Tel. (867) 360-6338
Gjoa Haven, NU X0B 1J0

**Re: 2BE-HOP / Miramar Hope Bay Ltd. / Hope Bay Windy Project / Licence
Renewal Application**

On behalf of Indian and Northern Affairs Canada (INAC) I have reviewed the above-mentioned application. The following specialist advice has been provided pursuant to INAC's mandated responsibilities for the enforcement of the *Nunavut Waters and Nunavut Surface Rights Tribunal Act* (NW&NSRT), *Arctic Waters Pollution Prevention Act* (AWPPA), and the *Department of Indian Affairs and Northern Development Act* (DIAND Act).

Miramar Hope Bay Ltd. (Miramar) is applying for a five (5) year Type B licence renewal for their Hope Bay Windy Project. Mineral exploration activities are based from a ninety (90) person camp that has been operational since 1996.

Indian and Northern Affairs Canada recommends that the Nunavut Water Board consider the following recommendations. *Please note that INAC will provide detailed abandonment and reclamation planning and financial security cost estimates for the project's liability in the near future. This information could not be provided prior to the licence renewal application review deadline.*

- The Environmental Protection Plan provided by Miramar is poorly formatted in terms of spill contingency planning. INAC recommends that a stand-alone spill contingency plan specific to the Hope Bay Windy Lake Project be developed. Should a hazardous material spill occur, responders require a concise spill contingency plan which provides emergency protection and handling procedures and applicable Material Safety Data Sheets.
- Twenty-four (24) hour contact information for the project's emergency response coordinator should be provided in the General Spill Response Plan's Notification Contact List. This will ensure that employees who discover hazardous material spills can activate appropriate response procedures and provides a point of contact for the INAC Water Resources Officer.

- The spill contingency plan should include detailed schematic diagrams of the Windy Camp, Patch Lake, and Roberts Bay. INAC recommends that these diagrams provide base contour lines, proximity to water sources, project infrastructure, and spill kit storage locations.
- Andrew Keim serves as the INAC Water Resources Officer within Nunavut. The spill contingency plan should be revised to include his name and contact information which is as follows: tel. (867) 975-4289, fax. (867) 979-6445, and email. keima@inac-ainc.gc.ca.
- The spill contingency plan should include a copy of the Nunavut 24-hour Spill Report Form that is accessible from the Nunavut Water Board website (<http://nunavutwaterboard.org>).

Wastewater Treatment

- Ice-based drill cuttings should be disposed of in land-based sumps.
- Land-based drill cuttings should be disposed of in drill-holes or sumps.
- All sumps, whether for the disposal of domestic graywater or drilling wastes, must be positioned at least 30 metres from the high water mark of nearby water bodies. Sumps shall be backfilled and contoured to prevent subsidence and collection of precipitation run-off.
- Miramar should provide discharge procedures for its rotating biological contact unit. Section 32 of the supplementary questionnaire states that treated graywater is released over the ridge east of Windy Camp via a 300 metre insulated heat trace line. The proponent should describe what erosion control measures it has in place (e.g., wetland treatment, silt curtains, etc.) and whether it will employ an intermediate staged holding tank prior to final discharge as per current licence requirements.
- INAC recommends that an operations and maintenance plan for the Windy Camp rotating biological contact unit be developed. This plan would include a schematic diagram of the facility's location (including baseline contours, proximity to water sources, and global positioning system coordinates), sampling procedures, facility maintenance requirements, and spill contingency planning.
- Should non-combustible waste materials be delivered to a Nunavut municipality solid waste landfill facility, INAC requests that a signed agreement between a designated municipal representative and Miramar be submitted to the Nunavut Water Board.

Abandonment and Reclamation

- The Windy Camp Closure and Reclamation Plan should be revised so that it is referenced as an Abandonment and Reclamation Plan applicable to the entire Hope Bay Windy Project. The current cover page states that it is an appendix and that is applicable to the Windy Camp. The submitted supplementary questionnaire references Patch Lake and Roberts Bay as areas of interest in the Hope Bay Windy Project. These areas, all hazardous material storage areas, and exploratory drill site reclamation procedures should be included in an Abandonment and Reclamation Plan.
- Section 7.5 (drill cutting management) of the Plan states that water from drill sumps is recycled as per the drilling procedure. The proponent should provide this procedure for review.
- The Plan states that empty 45-gallon drums will be drained, cleaned, crushed, and buried in the Doris North Landfill as a final reclamation procedure. Miramar should explain what measures it will take to make certain that the quality of freshwater resources will not be negatively impacted by drum cleaning activities. INAC recommends that mitigation methods be developed and incorporated into the project's abandonment and reclamation plan.

Indian and Northern Affairs Canada requests notification of any changes in the proposed project, as further review may be necessary. Please do not hesitate to contact me if you have any questions or comments with regards to the foregoing at (867) 975-4555.

Sincerely,

Original signed

David W. Abernethy
Regional Coordinator

Cc. Jim Rogers - Manager of Water Resources, Indian and Northern Affairs
Canada, Iqaluit