

**SPILL RESPONSE PLAN**  
***Ulu Gold Project***  
(including Hood River, Roma and other licensed projects)

Ulu Camp:  
Latitude: 66° 54' 27" N Longitude: 110° 58 '24" W

Kitikmeot Region, Nunavut

March 2024



## EMERGENCY CONTACTS (Additional contacts in Appendix A)

Organization	Contact	Location	Telephone/Radio
Blue Star	VP Exploration Darren Lindsay	Onsite	o. 778.379.1433
		Offsite	c. 236-330-8840
	CEO Grant Ewing	Offsite	778-379-1433
	<b>Project Manager</b>	Onsite	<b>867.677.0289</b>
	<b>Camp Manager</b>	<b>Onsite</b>	<b>867.677.0289</b> <b>Channel 1</b>
	Medic	Onsite	867.677.0290 <b>Channel 1</b>
NT-NU Spill Centre	24 hour Spill Report Line	Yellowknife	867-920-8130
Kitikmeot Inuit Association (KIA)	Inspector	Kugluktuk	867-982-3310
Crown-Indigenous Relations and Northern Affairs Canada	Inspector	Kugluktuk	867-982-4306

## SUMMARY

This Plan describes how people are trained and what needs to be done to respond safely to a spill of fuel or other hazardous material at all of Blue Star's work areas, including the Ulu Gold Project, near Kugluktuk, Nunavut.

## REVISION HISTORY

Revision #	Date	Section	Summary of Changes	Author	Approver
2BM-ULU2030, 2BE-HRP1932					
4	Nov 2023	Section 1.1, Section 1.3	minor edits to be inclusive of all project areas	BSG	D.Lindsay
		Figure 1	To be inclusive of all project areas	J.Maclean	D.Lindsay
		Table 2	Updated expected materials on site at any one time	BSG	D.Lindsay
		Section 5.1	Edited to current terminology of SDS not MSDS	BSG	D.Lindsay
		Appendix A	Updated contact list	BSG	D.Lindsay
		Appendix B	Added copy of form	BSG	D.Lindsay
2BE-HRP1932					
3	May 2022	Appendix A	Updated contact list	S. Hamm	D. Lindsay
2	Mar 2021	Summary Section 1.0	Amalgamated existing approved Hood River and Ulu management Plans into 1 document for operational efficiency as all activities will be centralized and based out of Ulu. Changes throughout to reflect name of project, related activities and authorizations.	S. Hamm	D. Lindsay
		Figure 1	Updated to remove Hood River camp and focus on Ulu infrastructure.		
		Section 2.0 Section 5.2	Updated contact info.		
		Section 4.0	Added response measures for a spill of dry goods and drill cuttings, as per 2BM- ULU2030 Part H Item 2.		
		Section 5.2 Appendix B	Revised to reflect requirement to report all spills, regardless of quantity		
1	Jan 2020	All	Approved May15, 2020	Blue Star Gold Corp.	
2BE-HRP1924					
1	Apr 2019	All	Approved July 15, 2019	Blue Star Gold Corp.	
2BE-HRP1419					

2	Sep 2015	-	-	WPC Resources Inc.
1	May 2014	-	-	WPC Resources Inc.
2BM-ULU0914				
1	Mar 2013	-	-	Bonito Capital Corp.
NWB1ULU0008				
5	Aug 2011	-	-	Elgin Mining Inc.
4	Dec 2007	-	-	Zinifex Canada Inc.
3	Feb 2006	-	-	Wolfden Resource Inc.
2	Apr 2004	-	-	Wolfden Resource Inc.
1	Oct 2001	-	-	Echo Bay Mines Limited

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## 1.0 INTRODUCTION

A spill is an uncontrolled or unplanned release of a regulated substance. Spills associated with Blue Star Gold Corp.'s (Blue Star) exploration Projects and related work areas may occur at a variety of worksites, including the camp, fuel caches, airstrip, reclamation work area, quarries and drill sites. Regardless of the type or quantity of material involved, all worksites must implement measures to reduce the potential for spills and have an action plan for responding to spills. This *Spill Response Plan* (the Plan) describes methods for preventing and responding to spills at the Project site and considers the guidance provided in the documents listed in Table 1 (which may be updated from time to time).

Table 1 Relevant guidance documents including legislation, permits and licences.

Document	Authority
Contingency Planning and Spill Reporting in Nunavut: A guide to the new regulations	Government of Nunavut
<i>Environmental Protection Act</i> , 1988	Government of Nunavut
<i>Spill Contingency Planning and Reporting Regulations</i> , 1993	Government of Nunavut
<i>Mine Health and Safety Act</i> , 1994	Government of Nunavut
<i>Mine Health and Safety Regulations</i> , 1995	Government of Nunavut
<i>Canadian Environmental Protection Act</i> , 1999	Government of Canada
<i>Environmental Emergency Regulations</i> , 2003	Government of Canada
<i>Transportation of Dangerous Goods Act</i> , 1992	Government of Canada
<i>Transportation of Dangerous Goods Regulations</i> , 2012	Government of Canada
<i>Hazardous Products Act</i> , 1985	Government of Canada
<i>Canada Labour Code</i> , 1985	Government of Canada
<i>Canada Occupational Safety and Health Regulation</i> , 1986	Government of Canada
Screening Decision Report	Nunavut Impact Review Board
Water Licences	Nunavut Water Board
Land Use Licence	Kitikmeot Inuit Association
Mining Lease	Government of Canada
Mineral Exploration Agreement	Nunavut Tunngavik Inc.

### 1.1 SCOPE

This Plan applies to spill response associated with activities occurring in relation to the Project including camp operation, progressive reclamation, drilling, quarrying and fuel caches.

### 1.2 OBJECTIVES

While plans and preventative measures are put in place, Blue Star recognizes that accidental spills and unplanned releases may occur. Accordingly, the objectives of this Plan are to:

- Ensure employees and contractors are trained to respond to spills in an effective manner;
- Identify materials that may routinely be stored or used on site;
- Outline appropriate spill response measures to ensure worker safety and environmental protection.

### **1.3 SITE DESCRIPTION**

The Project is located approximately 200 km southeast of Kugluktuk, Nunavut (see Figure 1), and consists of existing Ulu site infrastructure, including a camp, roads, pads, and airstrip and underground mine development as well as a larger study area, including that previously defined as the Hood River Gold Project area, the Roma Project area, and regional exploration areas of interest; the majority of activities are based out of the Ulu camp and undertaken in the local vicinity. The site is accessible by air, utilizing the nearby existing airstrip or an adjacent lake. The site has historically been accessed by a winter trail and may be accessed overland in the future by the same route to support resupply.

The Project is located within the Southern Arctic Ecozone and the Takijuk Lake Upland Ecoregion. Much of this region is composed of unvegetated rock outcrops. Vegetative cover is characterized by shrub tundra, consisting of dwarf birch, willow, northern Labrador tea, avens species and blueberry species. Organic Cryosols are the dominant soils in the lowlands and permafrost is deep and continuous (ECCC 2019).

Characteristic wildlife includes caribou, muskoxen, grizzly bear, wolverine, Arctic hare, Arctic fox, red fox and wolf. Small mammals (e.g., Arctic ground squirrel, voles, and lemmings) are distributed throughout the region and provide an important food source for predators. Many species of migratory birds are present in the area during the summer season, including waterfowl, raptors, songbirds, and shorebirds, while some bird species are present year-round (e.g., ptarmigan, gyrfalcon, and common raven) (ECCC 2019).

The current camp is located at Latitude: 66° 54' 27" N Longitude: 110° 58' 24" W.

The Ulu camp may be relocated in the future. Should this be the case, an updated Plan with new camp coordinates will be submitted to parties along with annual reporting.

### **1.4 PLAN MANAGEMENT**

This Plan is intended to fulfill requirements associated with the water licence(s) and the land use licence(s) as well as existing legislation. The Plan will be updated to reflect current camp and fuel cache locations and capacities, and to maintain a current contact list, as needed.

The Plan will be reviewed annually by the Project Manager and updated as needed. When material changes occur, the updated document will be provided to the Nunavut Water Board.

### **1.5 PLAN IMPLEMENTATION**

This Plan is effective upon approval and is valid throughout all phases of the Project.

The Project Manager or designate is responsible for Plan implementation.

A copy of this Plan is maintained on site in the Office, in each drill shack, in each shop, in the helicopter shack and within each spill kit deployed throughout the project area.

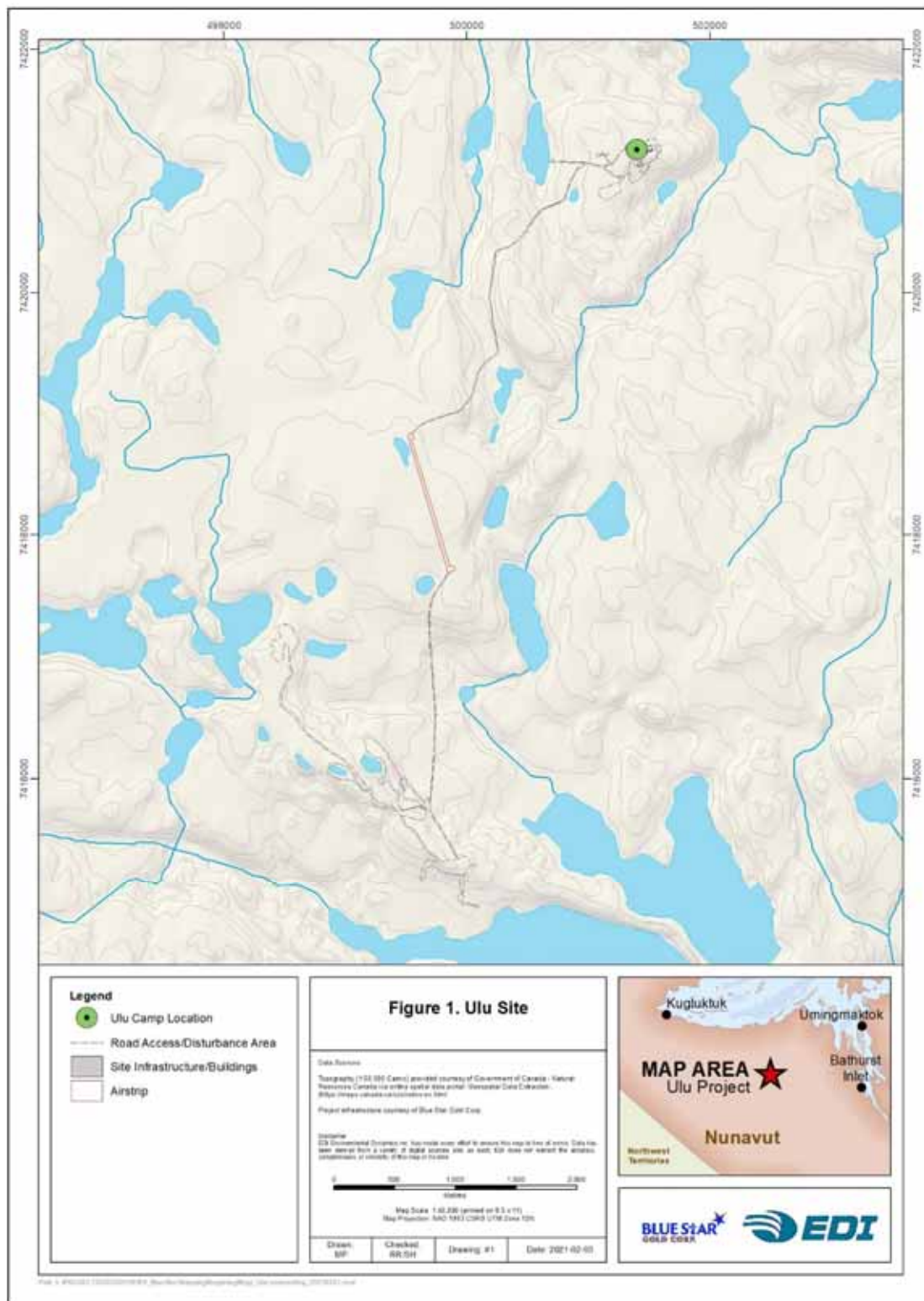


Figure 1 Ulu Gold Project site map.



## 2.0 ROLES AND RESPONSIBILITIES

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Blue Star is responsible for activities associated with the Project, including implementation and management of this Plan. Blue Star's contact information is provided below.

Blue Star Gold Corp.  
Suite 507-700 West Pender Street  
Vancouver BC V6C 1G8  
Phone: 1 778-379-1433

Contact: Darren Lindsay, Vice President of Exploration  
Phone: 1 778-379-1433  
Email: d.lindsay@bluestargold.ca

### 2.1 STAFF, CONTRACTORS, SUPPLIERS AND VISITORS

All personnel conducting activities on site, including staff, contractors, suppliers and visitors, are required to implement this Plan as it pertains to their activities on site. Specifically, these responsibilities include:

- Taking all necessary steps to minimize the chance of spills when working with chemicals, hydrocarbons, or regulated materials;
- Cooperating fully with your supervisor and/or Blue Star management to implement a spill prevention program in your work area;
- Only carrying out duties and tasks that you are experienced at and trained to perform;
- Where there is uncertainty, asking questions and bring concerns to the attention of your supervisor when working with products that pose potential environmental and health risks;
- Responding to spills for which you are responsible or discover, and for which you have the requisite training and equipment; and
- Reporting all spills, no matter how small or seemingly insignificant, to your supervisor or Blue Star management in a timely manner.

### 2.2 MANAGERS AND SUPERVISORS

Managers and supervisors have a responsibility to ensure that staff, contractors, consultants and visitors have been trained in Blue Star spill response expectations and procedures. Additional supervisor and manager responsibilities include:

- Maintaining a no blame work environment in initiating a spill response and related follow-up actions;
- Ensuring site-specific and material-specific training is provided to all departments and staff;
- Ensuring there are appropriate and sufficient spill response supplies in their area for the hazard characteristics and quantities of materials stored or handled;
- Providing assistance in response to spills including the coordination of additional response personnel or equipment;
- Maintaining records regarding inspections, personnel training, emergency equipment testing and spill kit maintenance; and
- Contacting appropriate government agencies and emergency services where appropriate.

An emergency contact list is provided in Appendix A.

## 3.0 SPILL PREVENTION

Successful spill prevention is largely based on safe storage and handling of materials and maintaining a known inventory of materials located within in suitable secondary containment.

### 3.1 PRODUCT INVENTORY

Table 2 outlines a typical inventory of products and volumes maintained on site during seasonal operations. Efforts are made to minimize the amount of materials stored on site during seasonal closure.

Table 2 Petroleum and chemical products typically stored on site.

Material	Amount	Container	Location	Storage
Diesel/biodeisel	Up to 187,000 L	200 L drums, bladders, fuel cubes, containers, tanks or equivalent	Drills Camp Airstrip Remote fuel cache	Secondary containment
Aviation fuel	Up to 264,000 L	200 L drums	Camp Airstrip Remote fuel cache	Secondary containment
Gasoline	Up to 6,600 L	200 L drums	Camp	Secondary containment
Propane	Up to 1,500 lbs	100 lb cylinders	Camp	Secondary containment
Various lubricants, greases and coolants	Up to 1,000 gal	10 gal pails	Drills Camp	Secondary containment
Waste oil and related products (filters, rags)	Various	200 L drums or lined mega bags	Staged at camp and airstrip for backhaul	Secondary containment
Salt	Up to 5,000 lbs	50 lb bags	Drills Camp	Secondary containment
Drill additives	Up to 1,000 gal	10 gal pails	Drills Camp	Secondary containment
Acetylene	Up to 1,000 lbs	100 lb cylinders	Camp	Secondary containment
Oxygen	Up to 1,000 lbs	100 lb cylinders	Camp	Secondary containment
Packaged ANFO explosives	Up to 7,500 lbs	55 lb totes or bags	Camp, quarry	Secondary containment
Spent spill response materials	Various	200 L drums or lined mega bags	Staged at camp and airstrip for backhaul	Secondary containment
Hazardous waste for backhaul and offsite disposal	Various	200 L drums, lined mega bags, or other TDG-approved container	Staged at camp and airstrip for backhaul	Secondary containment

### **3.2 MATERIAL STORAGE AND INSPECTION**

The materials listed in Table 2, along with their associated dispensing pumps and hoses, are stored in secondary containment, capable of containing 110% of the largest container. Secondary containment typically consists of Arctic-grade instaberm or equivalent. Secondary containment is periodically inspected, is maintained dry and is covered during seasonal closure.

Other considerations for proper material storage include the following:

- Store materials >31 m above the ordinary high water mark of any watercourse;
- Inspect material storage areas weekly or in accordance with permit and licence requirements, for capacity, ventilation, stability, organization, cleanliness and leak detection;
- Properly label storage containers and areas in accordance with the Workplace Hazardous Materials Information Management System (WHMIS);
- Identify material storage areas with multilingual signage (English, Inuktitut, Inuinnaqtun);
- Maintain storage area capacity such a that it is safely accessible;
- Store gas cylinders securely in an upright position;
- Store drums for immediate use in an upright position, and cached drums on their sides with bungs visible and in the 10 o'clock and/or 2 o'clock positions.

### **3.3 MATERIAL HANDLING AND DISPOSAL**

Considerations for proper material handling include:

- Conducting refueling and equipment repair in a designated area, >31 m above the ordinary high water mark of any watercourse, within secondary containment or utilizing a drip tray;
- Using equipment or seek assistance when transporting heavy or awkward containers;
- Using funnels and spill containment trays when pouring or transferring chemicals from one container to another; and
- Utilizing proper Personal Protective Equipment (PPE) when handling hazardous materials.

## 4.0 SPILL RESPONSE

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A spill response will vary depending upon the situation, the material spilled and location of the spill. As materials on site that pose the highest spill risk due to their volume and handling frequency are all petroleum products or allied petroleum products, the response procedures outlined in this document are considered to apply under most spill scenarios.

In all spill responses, the following steps should be taken to ensure worker safety and environmental protection are maintained:

- 1) Ensure your own safety and the safety of your coworkers by:
  - a) Stopping what you are doing;
  - b) Staying clear of the spill;
  - c) Warning others nearby,
  - d) Shutting down nearby equipment;
- 2) If required, assist injured or contaminated persons;
- 3) Assess the situation. Notify and report, as needed:
  - a) Emergency: if the spill poses a significant risk to persons, property or the environment, call for help and contact your supervisor or the Project Manager immediately;
  - b) Non-emergency: proceed with appropriate spill response;
- 4) Consult the Material Safety Data Sheet (MSDS) for exposure risk;
- 5) Put on appropriate PPE (gloves, safety glasses, apron, footwear);
- 6) Contain the spill as outlined in the following sections;
- 7) Label and store containers of waste and spent spill response materials in accordance with Sections 3.2 and 3.3;
- 8) Conduct spill reporting as outlined in Section 5;
- 9) Where required, participate in incident investigations and follow-up measures.

### 4.1 SPILLS TO TUNDRA

In the event of a fluid spill to the ground surface or tundra:

- If flowing fluid:
  - trench or ditch to intercept or contain fluid where feasible; or
  - construct a berm or barrier downslope of the spill. Use soil, or synthetic, impervious sheeting;
- Recover free product through manual or mechanical means including shovels, heavy equipment and pumps;
- Absorb petroleum residue with synthetic sorbent socks, pillows, pads or granular materials;
- Mechanically recover contaminated rock, soil and vegetation using a shovel;
- Backfill any excavated areas with available soil, sand gravel or bentonite.

If dry chemicals or other materials are spilled to the ground surface or tundra, the product is cleaned up immediately with a shovel, loader or otherwise manually, as needed, with any recovered materials reused to the greatest extent possible, an/or otherwise disposed of suitably.

Should any recoverable amounts of drill cuttings be deposited to the tundra in the vicinity of the drill, cuttings are collected and deposited in the drill sump, to the extent possible without disturbing the tundra, and/or to the satisfaction of the Inspector.

## **4.2 SPILLS TO SNOW**

In the event of a spill to snow:

- If flowing fluid, construct an ice berm or barrier downslope of the spill by compacting snow and spraying with water (if conditions permit) or use synthetic, impervious sheeting;
- Compact snow around the perimeter of the spill area;
- Locate the low point of the spill area and clear channels in the snow towards this low point, to allow free product to flow into the low point;
- Recover free product through manual or mechanical means including shovels, heavy equipment and pumps, or if approved, combust in situ;
- Absorb petroleum residue with synthetic sorbent socks, pillows, pads or granular materials;
- Mechanically recover all contaminated snow and ice.

If dry chemicals or other materials are spilled, the product is cleaned up immediately with a shovel, loader or otherwise manually, as needed, with any recovered materials reused to the greatest extent possible, an/or otherwise disposed of suitably.

Should any recoverable amounts of drill cuttings be deposited to the snow in the vicinity of the drill, cuttings are collected and deposited in the drill sump, to the extent possible without disturbing the tundra, and/or to the satisfaction of the Inspector.

## **4.3 SPILLS TO ICE**

In the event of a fluid, dry materials or drill cuttings spill to ice:

- Follow procedures for a spill to snow.

In the event that materials penetrate and are under the ice:

- Drill holes through ice using ice auger to locate fuel/petroleum product;
- Once detected, cut slots in the ice using chain saws and remove ice blocks. Light non-aqueous phase liquids will collect in openings in the ice;
- Recover free product through manual or mechanical means including scoops or pumps, or, if approved, combust in situ;
- Absorb petroleum residue with synthetic sorbent socks, pillows or pads.

## **4.4 SPILLS TO WATER**

In the event of a fluid spill to water:

- Monitor the movement of the spilled materials from a helicopter;
- Deploy and secure booms around the perimeter of the spilled material;
- Absorb petroleum residue with synthetic sorbent socks, pillows or pads;
- Recover free product by floating absorbent socks, pillows or pads on the water surface, deploying a skimmer, or, if approved, combust in situ or apply chemical dispersants.

## **4.5 SPILL KITS**

Spill kits on site may vary based on location and supplier. Contents of typical small and large kits are presented below. Large spill kits will be located at each fuel cache, drill, helipad and refueling area and

adjacent to aircraft landing areas. Small spill kits will be located in the boat, adjacent to water pumps and elsewhere as needed.

A typical small (68 L) spill kit may contain the following:

- 50 oil sorbent pads;
- 4 small pillows;
- 2 large pillows;
- 4-4 inch socks;
- 1 plug patty (instant leak-stop);
- 1 pair of nitrile gloves;
- 1 pair of splash goggles; and
- 1 disposable respirator.

A typical large (220 L) spill kit may contain the following:

- 4 socks (3" x 10');
- 5 socks (3" x 4');
- 50 pads;
- 5 pillows;
- 1 roll;
- 1 drain cover;
- 1 caution tape;
- 2 pairs nitrile gloves;
- 2 pairs safety goggles;
- 2 protective coveralls;
- 10 disposable bags; and
- 1 instruction book.

Spill kits are inspected at the start of each field season and following each spill response to ensure contents are sufficient.

Additional spill response materials will be stored on site in the Shop and include a trash pump, several shovels, extra nitrile gloves, extra sorbent pads and extra granular sorbent material. Further, heavy equipment is available on site to excavate and transport materials and a boat will be available to assist in responding to a spill on water.

## 5.0 REPORTING AND DOCUMENTATION

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### 5.1 SAFETY DATA SYSTEM

SDS sheets are maintained on site in the Office, the Shop and the Medical Tent. The SDS sheets are reviewed annually at the start of the field program to ensure that appropriate and current SDS sheets are available.

### 5.2 SPILL REPORTING

Spill reporting is a key component of the spill response efforts. Once it is safe to do so, the first responder shall collect the following info:

- Date and time of spill;
- Location of spill;
- Direction the spill is moving;
- Name of contact person at location of spill, and phone number where applicable;
- Material and quantity spilled;
- Cause of spill;
- Whether spill is contained or stopped;
- Action taken to contain, recover, clean-up and dispose of spilled material

All spills and unplanned releases are reported to the Project Manager, and externally where required. In the event of a reportable spill, and once it is safe to do so, the Project Manager or designate will initiate notification of the following (contact info is provided in Appendix A):

- Blue Star Vice President of Exploration;
- NT-NU 24-hour spill report line;
- Kitikmeot Inuit Association;
- CIRNAC Inspector.

Following initial notification, the Project Manager will complete the NT-NU Spill Reporting Form (Appendix B). The completed form must be submitted to the CIRNAC Inspector and the KIA within seven calendar days of the incident.

A detailed follow-up report must be submitted to the CIRNAC Inspector within 30 days of the incident.

## 6.0 TRAINING

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All attendees to site participate in a site orientation which outlines onsite hazards and roles and responsibilities regarding material handling, storage and spill response. Spill kit contents and deployment are periodically reviewed at weekly site safety meetings.

All attendees to site must be trained in WHMIS.

## 7.0 REFERENCES

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*Canada Labour Code* R.S.C., 1985, c. L-2

*Canada Occupational Safety and Health Regulation*. 1986. SOR/86-304

*Canadian Environmental Protection Act (CEPA)*. S.C. 1999, c.33

*Hazardous Products Act* R.S.C., 1985, C. H-3

*Environmental Emergency Regulations* SOR/2003-307

*Environmental Protection Act*. R.S.N.W.T. 1988, c.E-7

*Mine Health and Safety Act, SNWT (Nu) 1994, c25*

*Mine Health and Safety Regulations, NWT Reg (Nu) 125-95*

*Spill Contingency Planning and Reporting Regulations* R-068-93

*Transportation of Dangerous Goods Act (TDGA)*. S.C. 1992, c.34

*Transportation of Dangerous Goods Regulations*. SOR/2012-245

Environment and Climate Change Canada. 2019. The Ecological Framework of Canada, Southern Arctic Ecozone, Takijuk Lake Upland Ecoregion. Accessed March 2019  
<http://ecozones.ca/english/region/41.html>

Government of Nunavut. Contingency Planning and Spill Reporting in Nunavut: A guide to the new regulations.



## APPENDIX A: EMERGENCY CONTACTS

Organization	Contact	Location	Telephone/Radio
Blue Star	VP Exploration Darren Lindsay	Onsite	o. 778.379.1433
		Offsite	c. 236-330-8840
	CEO Grant Ewing	Offsite	778-379-1433
	Project Manager	Onsite	<b>867.677.0289</b>
	Camp Manager	Onsite	<b>867.677.0289</b> Channel 1
	Medic	Onsite	867.677.0290 Channel 1
NT-NU Spill Centre	24 hour Spill Report Line	Yellowknife	<b>867-920-8130</b>
Kitikmeot Inuit Association (KIA)	Lands Department	Kugluktuk	867-982-3310
	Inspector	Kugluktuk	867-982-3310
Crown-Indigenous Relations and Northern Affairs Canada	Field Operations	Iqaluit	<b>867-975-4295</b>
	Inspector	Kugluktuk	867-982-4306
Environment and Climate Change Canada	Operations Manager	Yellowknife	867-669-4730
Fisheries and Oceans Canada	Regional Office	Yellowknife	867-669-4800
GN Department of Environment	Director Environmental Protection	Iqaluit	867-975-7748
Nunavut Water Board	Executive Director	Gjoa Haven	867-360-6338
Kugluktuk Health Centre		Kugluktuk	867-982-4531
RCMP		Kugluktuk	867-982-0123 or 867-982-1111
Mines Inspector		Iqaluit	800-661-0792

## SITE RADIO CHANNELS

Channel	Contact
1	General
1	Medic/Emergency
GSH	Aviation
1	Drills

## APPENDIX B: NT-NU SPILL REPORT FORM

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Form is also available online at:

[http://www.gov.nu.ca/sites/default/files/NT%20NU%20Spill%20Report%20Form\\_0.pdf](http://www.gov.nu.ca/sites/default/files/NT%20NU%20Spill%20Report%20Form_0.pdf)

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