



Environment Canada  
Environnement Canada

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March 19, 2002

Our File: 4703 001 \_\_\_\_\_

Gladys Joudrey  
Environmental Assessment Officer  
Nunavut Impact Review Board (NIRB)  
PO Box 2379  
Cambridge Bay, NT X0E 0C0.

**Re: Land Use Permit Application NIRB 02EN039 / NWB Water Application NWB21ZO - Inmet Mining Corp. - Exploratory Drilling, Research and Camp - Izok and Ham Lake, NU.**

On behalf of the Environmental Canada I have reviewed the information submitted with the above application, and recommend the following conditions for inclusion in the land use/water licence. This advice is provided pursuant to Section 12(3) of the *Canadian Environmental Assessment Act* (CEAA), and is based primarily on Environment Canada's mandated responsibilities for the enforcement of the *Canadian Environmental Protection Act* (CEPA), Section 36(3) of the *Fisheries Act* and the *Migratory Birds Convention Act*.

#### Comments and Recommendations

- Meeting the requirements of the Federal *Fisheries Act* is mandatory, irrespective of any other regulatory or permitting system. Section 36(3) of the *Fisheries Act* specifies that unless authorized by federal regulation, no person shall deposit or permit the deposit of deleterious substances of any type in water frequented by fish, or in any place under any conditions where the deleterious substance, or any other deleterious substance that results from the deposit of the deleterious substance, may enter any such water.
- Drilling wastes from land-based drilling shall be disposed of in a sump such that they do not enter any waterbody.
- If an artesian flow is encountered, core-drill holes shall be plugged and permanently sealed upon project termination. Poor quality ground water from one aquifer may contaminate another or in some cases flowing conditions at the surface can create large washouts or quicksand conditions.
- The proponent has not indicate if drill additives are to be used during diamond drilling program. Waste tracking, or "manifesting," should be implement to ensure proper use, storage, and management of materials. Manifests provide detailed information to first responders in the event of an accident and serve as a tool for confirming that shipments of dangerous oilfield wastes (hazardous waste) are properly handled, transported, and disposed of.

EPA 307 Paper Project Book 1997



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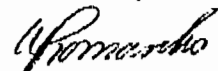
- The proponent shall not deposit nor permit the deposit of slash, debris or sediment into any water body. These materials shall be disposed of above the high water mark in such a fashion that they do not enter the water.
- Fuel containers should be stored on flat, stable terrain or in natural depressions well away from waterbodies. The fuel containers should be inspected periodically for leaks. Environment Canada recommends that all fuel storage be equipped with secondary containment and the other hazardous materials be stored in such a manner as to prevent their release into the environment.

#### Contingency Plan

- Inmet Mining Spill Contingency Plan, Section 4.0, Reporting Procedures: "NWT Environmental Protection Service 24-hour spill reporting" should read "NWT 24-Hour Spill Report Line, fax number (867) 920-8130".
- Section 4.0, Point 3.0, specifies a "reportable" spill is "If the spill is significant, generally greater than 100 L and/or if any material entered a water body likely to contain fish, then the Site Manager must report the incident. The position accepted by all signatories to the NWT/Nunavut Spills Agreement is that all spills shall be reported.
- Section 4.0, Point 3: The spill should be reported immediately to the NWT 24-hour Spill Report Line, *not* "within 24 hours of the event occurring". Waiting 24 hours to report a major spill is unlikely to be construed as duly diligent behavior by regulatory authorities.

Changes in the proposed or permitted activities associated with this land use application would require further review. I can be contacted at (867) 669-4736 (by e-mail at [wade.romanko@ec.gc.ca](mailto:wade.romanko@ec.gc.ca)) for any questions or comments with regard to the foregoing.

Yours truly,



Wade Romanko  
Aquatic Environmental Officer  
Environmental Protection Branch - Northern Division

cc. Rita Becker - NWB Licensing Administrator