



Environmental Protection Operations Directorate
Prairie & Northern Region
5019 52nd Street, 4th Floor
P.O. Box 2310
Yellowknife, NT X1A 2P7

ECCC File: 6100 000 002 /008
NWB File: 2BE-IZO1217

December 11, 2017

Via email to: licensing@nwb-oen.ca

Richard Dwyer
Licence Administrator
Nunavut Water Board
P.O. Box 119
Gjoa Haven, NU X0B 1J0

Dear Mr. Dwyer:

**RE: 2BE-IZO1217– MMG Resources Inc. –Izok Lake Project – Type B Water
Licence Renewal**

Environment and Climate Change Canada (ECCC) has reviewed the information submitted to the Nunavut Water Board (NWB) regarding the water licence 2BE-IZO1217 renewal application and is submitting the following comments via email as requested by the NWB. ECCC's specialist advice is provided based on our mandate, in the context of the *Canadian Environmental Protection Act*, the pollution prevention provisions of the *Fisheries Act*, the *Migratory Birds Convention Act*, and the *Species at Risk Act*.

1. Secondary Containment, Spill Contingency Plan p.3

In the Spill Contingency Plan, ECCC notes that there is a mention of a fuel storage area on site. However, secondary containment for this area was not mentioned.

Fuel spills and leaks must be managed so they don't cause harm to wildlife or enter fish-bearing waters. ECCC believes that secondary containment of the fuel storage areas are necessary and that spill kits should be readily available at these locations.

ECCC recommends that MMG Resources Inc. (the Proponent) install secondary containment at the fuel storage locations in order to manage potential spills and leaks and that the Proponent have spill kits readily available at these locations.

2. ECCC Contact Number, Spill Contingency Plan p.4-5

On p.4, the contact number for ECCC is listed as (867)-669-4644. In the case of a spill or emergency, the 24 hours NWT-NU Spill Report Line should be contacted first by the Proponent. The NWT-NU Spill Report Line will then involve ECCC Emergencies when appropriate. For information relating to the environmental enforcement and reporting requirements under the Canadian Environmental Protection Act and the Fisheries Act please contact ECCC Environmental Enforcement at 867-669-4730.

ECCC recommends that the Proponent remove the (867)-669-4644 number from the Spill Contingency Plan

Should you require further information, please do not hesitate to contact me at (867) 669-4746 or Gabriel.Bernard-Lacaille@canada.ca.

Sincerely,

[original signed by]

Gabriel Bernard-Lacaille
Environmental Assessment Coordinator

cc: Melissa Pinto, Senior Environmental Assessment Coordinator
Georgina Williston, Head, Environmental Assessment North (NT and NU)
Theodore Muraro, MMG Resources Inc.