



Environment Canada
Environnement Canada

Environmental Protection Branch
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July 13, 2001

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

Our file: 4703-003-011

Fax: (867) 360-6369

Re: Comments on Application for Water License NWB2JAC - Twin Mining Corp. - Drilling Exploration, Baffin, NU.

On behalf of Environment Canada (EC), I have reviewed the above noted water license NWB2JAC. The comments provided for the above water license have been made under Section 36 of the *Fisheries Act*, the *Canadian Environmental Protection Act* (CEPA) and the *Migratory Birds Convention Act* (MBCA).

Twin Mining Corporation has proposed to conduct exploratory drilling and prospecting for diamond within Jackson Inlet on the Brodeur Peninsula. Temporary camp will be set upon to accommodate a maximum of 16 people over a two month period.

Comments and Recommendations

Wildlife Concerns

The camp and nearby drilling site are located along an east-west transect. While there are no known key migratory bird terrestrial habitat sites directly at the camp location, the camp is close to Ivory Gull colonies located north and south of Jackson Inlet. These colonies are sensitive to disturbance by air or ground vehicles, and thus the applicant is strongly recommended to stay clear of these colonies through July and August. These gulls are pure white, and their colonies are obvious to the eye when in the air, as there is little or no other white against the rock outcrops on which they nest. If colonies are sighted, helicopters should remain more than 1 km away. Also, the CWS would greatly appreciate if the applicant could record their location and report that to us, or the DSD Officer in Arctic Bay.

Spill Contingency Plan

Under section on "Initial Action and Action Plan", it discusses the use of 1 ton bags for storing contaminated soil. However, these bags are to be left at Nanisivik Mine. Difficult weather conditions can often restrict access to and from Nanisivik for several days. To avoid problems caused by these delays, Environment Canada recommends that 1 or 2 of the bags should be available at the site.

Under section on "Reporting Procedure" the Area Code for the Spill Line should be corrected to 867.

The proponent neglected to:

- indicate if spill kits are to be used at fuelling and fuel storage areas;
- land area (meters squared) to be affected by proposed drill works;
- the location of holes in relation to water;
- number of holes to be drilled;

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- types of drill additives to be used;
- provide location of sumps for both camp and drill activities in relation to water;
- include location of fuel storage in relation to water for aircraft, camps and drilling uses;
- include the estimated volume of fuel to be stored;
- provide information as to how equipment will be arriving to site.

The following conditions should be applied throughout all phases of the project.

- The proponent shall ensure that any drill cuttings, chemicals, fuel or wastes associated with the proposed project do not enter waters frequented by fish. All sumps, spill basins and fuel caches should be located in such a manner that the contents do not enter a waterbody.
- EC encourages proponents, when storing barreled fuel at a location, to use a secondary containment rather than relying on "natural depressions". Self supporting insta-berms are available from various suppliers within Canada.
- No disturbance of the bed or banks of any definable watercourse is permitted. Special efforts must be made to avoid bed and bank disturbance during the spring.

Please do not hesitate to contact me with any questions or comments with regards to the foregoing at (867) 975-4639 or by email at lawrence.ignace@ec.gc.ca.

Yours truly,



Lawrence Ignace
Environmental Assessment Specialist

cc: (Paula Pacholek, Northern Environmental Assessment Coordinator, Yellowknife)
(Mark Mallory, CWS, Iqaluit)