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May 7, 2002

Rita Becker
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Sent by email to:
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Jackson Inlet Water Licence Renewal Application and Spill Contingency Plan

On behalf of Indian and Northern Affairs Canada (INAC), I have reviewed both the water licence renewal application and the spill contingency plan submitted by Twin Mining Corp. with respect to their Jackson Inlet exploratory drilling project. I am pleased to offer the following comments.

With respect to the water licence renewal application, the project is a small, temporary camp with minimal water use and sewage generation. In this case, the quantity of water use is below the threshold for a Class B water licence according to the *Nunavut Waters and Nunavut Surface Rights Tribunal Act* regulations.

Admittedly, the drilling aspects of the project do surpass the water use threshold for the requirement of a Class B water licence. However, the drilling will be scattered in several locations, up to 20 km apart, and the water used for drilling will not all originate from the same source. INAC believes that this is no different than having several small camps, none of which would require a Class B water licence on their own. INAC therefore does not believe that a water licence is required for this particular project.

With respect to water use and waste disposal, INAC's concerns have already been dealt with in sections 31(1)(e) and 31(1)(g) of the proponent's Class A Land Use Permit N2001C0028 (note that the permit number differs from the proponent's old land use permit N2000C0048 which was cited in their water licence renewal application). These include conditions to keep their sewage and grey water sumps at least 31 m from the high water mark of any stream, to backfill and restore all sumps prior to leaving the site, to burn all combustible garbage and debris daily, and to place all non-combustible garbage from the land use area into an approved disposal site. The information provided in the proponent's renewal application form deals with these issues, and we have no concerns with this project as the land

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use permit will sufficiently regulate the proposed activities.

Finally, we have no concerns with the spill contingency plan.

If you have any concerns or questions, please feel free to contact me.

Sincerely,

Original Signed By: Michael Roy

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