



Water Resources Division
Nunavut Regional Office
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Our File: / CIDMS
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Nunavut Water Board
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**Refer: 2BE-KIG0812 –Areva Resources Canada Inc. / Kiggavik Project /
Type B Licence Application for Amendment**

Please be advised that Indian and Northern Affairs Canada (INAC) has reviewed the Type B Water License Application for Amendment as submitted by Areva Resources Canada Inc for the Kiggavik Project on June 16, 2008. Areva is requesting to amend their current water usage amount from 110 m3/day to 300 m3/day. The reason for this increase is to support the company's 2008 drilling program. In conducting our review, INAC has referred to the documents on the NWB's FTP-site under 2BE-KIG.

The following recommendations are provided for consideration by the Nunavut Water Board during its review/approval of Areva's application for amendment:

Water Use

- The proponent has indicated they 'would like to be approved for the maximum allowable rate under a Class B licence (300 cubic metres per day)'¹. INAC is of the understanding that whereas Areva is currently licensed under a 'Type B Mining and Milling' classification, and, as per the Northwest Territories Water Regulations Schedule 5 (licensing criteria for mining and milling undertakings), Column 3 (Water use and deposit of waste requiring a Type 'B' licence) which allows the '...use of 100 or more cubic metres per day for undertakings other than milling or production...' there is no upper threshold for the use of water for exploration drilling for this category. The threshold is based on the amount of ore (tonnes).
- INAC recommends that the Proponent provide the Board with a map, noting GPS locations, of any additional water where water will be obtained from other than those identified in the 2BE-KIG0812 approved water licence.

¹ Water Licence Application Form dated June 16, 2008, from Areva Resources Canada Inc. to the Nunavut Water Board, Re: Amendment to existing water license 2BE-KIG0812.



Disposal of Waste

- INAC recommends the Nunavut Water Board consider specifying a mode of incineration. This would provide greater clarity to the proponent, and ensure waste is incinerated appropriately as to avoid possible leaching into surrounding waters from improperly burnt ash, and the excessive deposition of particulate matter into watersheds which could adversely affect water quality. For example, the Government of Nunavut in its intervention to the water board regarding Areva's request for renewal in February 2008 states 'It is noted in the application that the camp has been expanded to about 50 people, and that a single chamber incinerator is used. However, for camps of 10 to 50 people or greater than 50 people, it is generally advised to use a dual chamber forced-air incinerator or a dual chamber controlled-air incinerator, respectively.'

Spill Contingency Plan

- The proponent should update the Spill Contingency Plan to reflect any necessary changes, such as increase in stored fuel or chemicals, additional spill kits and the location of the spill kits, etc.
- The contact information for 'INAC, Kivalliq Water Resources Officer' should be changed; David Ningeongan's name and email address should be removed and left blank, and the phone number changed from (867) 975-645-2089 to (867) 645-2831.

Monitoring

- The project's licence monitoring program requirements should be expanded to include the collection of basic water quality data at the water sources downstream of each drill site. Using a calibrated field meter or other approved method, a total of three (3) parameters (pH, water temperature, and conductivity) should be collected / analysed upstream and downstream of each drill prior to and upon completion of drilling activities. The information should be provided to the Nunavut Water Board in the Proponent's annual report. If pH or conductivity change significantly (ie., in the order of one magnitude, the Proponent should inform the Nunavut Water Board of any actions taken to determine and possibly mitigate the cause.
- If drilling extends through the permafrost base, INAC recommends the Board request the Proponent to provide the depth and location of the permafrost in their annual report to the Board.



Indian and Northern
Affairs Canada

Affaires indiennes
et du Nord Canada

Should you have any questions or comments, please do not hesitate to contact me at (867) 975-4566 or by email at trenholmt@inac.gc.ca

Sincerely,

Originally signed by

Tanya Trenholm
Pollution Policy Specialist

Cc. Kevin Buck, Manager of Water Resources – Indian and Northern
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