

February 26, 2008

Richard Dwyer Licence Administrator Nunavut Water Board Gjoa Haven, NU X0B 1J0

2BE-KIG0708 / Areva Resources Canada Inc. / Kiggavik Project / Type B Re: **Licence Renewal Application**

File: 9545-2-6SISG / CIDMS: 199198

Reference: 2BE-KIG

On behalf of Indian and Northern Affairs Canada (INAC), I have reviewed the above mentioned Type B licence renewal application submitted by Areva Resources Canada Inc. for the Kiggavik Project. The following advice has been provided pursuant to INAC's mandated responsibilities for the enforcement of the Nunavut Waters and Nunavut Surface Rights Tribunal Act and the Department of Indian Affairs and Northern Development Act.

Areva Resources Canada Inc.'s Kiggavik Project is situated in the Kivallig Region, approximately 80 kilometers west of Baker Lake, Nunavut. Project activities are directed toward the study of localized uranium deposits. The proposed mineral exploration program comprises of prospecting, geological mapping, geochemical and geophysical survey work, diamond drilling, drill core logging, and sampling. A seasonally occupied camp, capable of accommodating 50 people, has been constructed to support this undertaking. This camp has a general coordinate of 64°24' north latitude, 97°52' west longitude.

Indian and Northern Affairs Canada recommends that the following comments be considered when reviewing this licence renewal application:

- 1. The Proponent is requesting a Type B licence for a term of two (2) years. The issuance of a five (5) year licence is preferred if there is a possibility for mineral exploration to continue within the foreseeable future. The licence can be amended to accommodate changes to scope of work.
- 2. The Water Licence Application Form should be signed and dated by Tina Hessdorfer, the identified Areva Resources Canada Inc. representative.
- 3. According to Item 26 of the submitted Exploration / Remote Camp Supplementary Questionnaire, the project's camp will no longer use a small unnamed lake for its



water source due to oil and grease contamination. The Proponent should identify the source of this contamination and determine possible mitigation measures. The Nunavut Water Board (NWB) and INAC Water Resources should be made aware of the Proponent's plans to address this matter.

- 4. The Proponent should ensure that all camp gray-water is directed to a sump capable of containing the predicted 6 cubic metre daily discharge. This sump should have an adequate freeboard to ensure that gray-water will not overflow into the surrounding environment due to the collection of precipitation runoff.
- 5. A copy of the signed agreement between the Hamlet of Baker Lake, Nunavut and Areva Resources Canada Inc. regarding the disposal of non-combustible, inert waste at the Hamlet of Baker Lake's municipal solid waste treatment area should be posted on the NWB online public registry. This letter is referenced in Item 34 of the submitted Exploration / Remote Camp Supplementary Questionnaire.
- 6. Lined, impermeable, spill containment areas should be installed at all double walled steel EnviroTank fuel storage locations. These containment areas should be designed to hold any accidentally released fuel between scheduled fuel storage inspections.
- 7. All fuel transfer sites should be contoured and lined with impermeable material as a freshwater quality mitigation measure. The cumulative impact of minor spills from the refueling of equipment has the potential of being quite large.
- 8. The submitted Spill Contingency Plan states that there are three (3) primary fuel caches in the Kiggavik Project. These caches are situated at Kiggavik, on an esker, and at Sissons. A detailed description of each fuel cache (i.e., state the total amount of stored fuel) should be communicated in the Plan.
- The Spill Contingency Plan and Emergency Response Manuals should include the contact information of both Peter Kusugak, INAC Nunavut Regional Manager of Field Operations, and David Ningeongan, INAC's Kivalliq Region Water Resources Officer.
 - a. Peter Kusugak, Manager of Field Operations

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b. David Ningeongan, Kivalliq Water Resources Officer

- 10. The storage location of floating booms used to recover fuel spills on water sources should be communicated in Item 3.3 of the project's Spill Contingency Plan. Item 6.2.4 of this Plan references their use for such clean-up measures.
- 11. The project's Spill Contingency Plan should include a map of the project area identifying all fuel caches and project infrastructure (i.e., seasonal camp).
- 12. Detailed schematic diagrams of each primary fuel storage area should be provided within the project's Spill Contingency Plan. These diagrams should be set to an appropriate scale, include a title and legend, and reference their cardinal north orientation, base contour lines, proximity to freshwater resources, and spill response equipment storage locations.
- 13. The submitted Waste Management Plan references a waste storage area for recovered hazardous materials. This Plan should include a detailed description of this storage area and a schematic diagram.

Indian and Northern Affairs Canada requests notification of any changes in the proposed project, as further review may be necessary. Please contact me should you have any questions or comments with regards to the foregoing. I can be reached by telephone at (867) 975-4555 or by email at AbernethyD@inac-ainc.gc.ca.

Regards,

Original signed by

David W. Abernethy Water Resources Coordinator

Cc. Jim Rogers, Manager of Water Resources – Indian and Northern Affairs Canada, Nunavut Regional Office