

Environmental Protection Operations  
Qimugjuk Building 969  
P.O. Box 1870  
Iqaluit, NU X0A 0H0  
Tel: (867) 975-4631  
Fax: (867) 975-4645

December 15, 2009

Phyllis Beaulieu  
Manager of Licensing  
P.O. Box 119  
Gjoa Haven, NU  
X0B 1J0  
Tel: (867) 360-6338 ext.29

Our File: 4703 001 006  
NWB File: 2BE-KIG0812

via e-mail [licensing@nunavutwaterboard.org](mailto:licensing@nunavutwaterboard.org)

**RE: Areva Resources Canada Inc. Kiggavik Project – Amendment – Type “B” Water License**

On behalf of Environment Canada (EC), I have reviewed the information submitted for the above-mentioned amendment application. The following specialist advice has been provided pursuant to Environment Canada’s mandated responsibilities under the *Canadian Environmental Protection Act*, Section 36(3) of the *Fisheries Act*, the *Migratory Birds Convention Act*, and the *Species at Risk Act*.

Areva Resources Ltd. (Areva) has applied for an amendment to their current water license NWB 2BE-KIG0812 for the Kiggavik Project located approximately 80 km west of Baker Lake, Nunavut. AREVA proposes to drill 10 to 12 boreholes using a heli-portable drilling rig in order to better determine the rock structure and building requirements for a bridge across the Thelon River. One to two boreholes will be drilled on the abutment and at the pier location and six to eight holes on the frozen river.

Environment Canada provides the following comments and recommendations for the Nunavut Water Board’s consideration:

- All mitigation measures identified by AREVA, and the additional measures suggested herein, should be strictly adhered to in conducting project activities. This will require awareness on the part of the AREVA’s project representatives (including contractors) conducting operations in the field. EC recommends that all field operations staff be made aware of AREVA’s commitments to these mitigation measures and provided with appropriate advice / training on how to implement these measures
- AREVA proposes to submit updated Spill Contingency Plan, Abandonment and Restoration Plan, Waste management Plan, Noise Abatement Plan and Wildlife Monitoring and Mitigation Plan, to address the changes to the project as a result of the proposed amendment, in January 2010 with the annual report. EC would be pleased to review these reports when they are made available.
- For lake-based winter drilling the proponent may refer to the Interim Guidelines for On-Ice drilling. Return water released to the lake must be non-toxic. Return water release must not result in an increase in total suspended solids in the waters of the lake that exceeds Canadian Council of Ministers of the Environment (CCME) Guidelines for the Protection of Freshwater Aquatic Life (i.e. 10 mg/L for lakes with background levels under 100 mg/L, or 10% for those above 100 mg/L).

- Refueling shall not take place below the high water mark of any waterbody and shall be done in such a manner as to prevent any hydrocarbons from entering any waterbody frequented by fish.

Thank-you for the opportunity to comment on the proposed amendment to the current water license for the Kiggavik Project. If there are any changes in the proposed project, EC should be notified, as further review may be necessary. If you should have any questions regarding the foregoing please contact Environment Canada via email at [EC.EA.NU@ec.gc.ca](mailto:EC.EA.NU@ec.gc.ca).

Yours truly,

*Original signed by*

Carrie Spavor  
Environmental Assessment Coordinator

cc: Carey Ogilvie (Head, Environmental Assessment-North, EPOD, Yellowknife, NT)  
Ron Bujold (Environmental Assessment Technician, Yellowknife, NT)