



Water Resources Division
Nunavut Regional Office
Iqaluit, NU X0A 0H0

Our File: 9545-2-6SISG / 163168

Your File: 2BE-KIG

August 20, 2007

Richard Dwyer
Licensing Trainee
Nunavut Water Board
Gjoa Haven, NU X0B 1J0

**Re: 2BE-KIG / AREVA Resources Canada Inc. / Kiggavik Sissons Project /
Kivalliq Region / Spill Contingency Plan**

On behalf of Indian and Northern Affairs Canada (INAC), I have reviewed the Spill Contingency Plan submitted by AREVA Resources Canada Inc. (AREVA) for the Kiggavik Sissons 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* (NW&NSRT) and the *Department of Indian Affairs and Northern Development Act* (DIAND Act).

Indian and Northern Affairs Canada believes that the Spill Contingency Plan should include the following recommendations. Certain recommendations are listed by their applicable sections within the Plan.

1. Section 1.1, AREVA's Exploration Department Environmental Policy, states that AREVA's *Environmental Code of Practice* provides more specific and detailed procedures pertaining to spill response, outlining responsibilities and expectations which field personnel are expected to follow. The Spill Plan should be a stand alone reference document to be used when responding to hazardous material spills and should include specific and detailed spill contingency plans developed by AREVA. AREVA should ensure that this Plan includes all relevant information provided in the *Environmental Code of Practice*;
2. Section 3.1, Petroleum and Chemical Product Storage and Inventory, lists the two (2) fuel caches within the project area; provides their coordinates; and describe the amount of fuels to be delivered to the project area. AREVA should indicate the types and quantity of fuel products that will be delivered to each fuel cache;

3. Section 4.2, Mitigation and Preventative Measures, does not state that secondary containment measures will be used at fuel caches as indicated in Section 3.1. AREVA should revise its Plan to ensure that it is consistent throughout. INAC recommends that some form of secondary containment be established and noted at all fuel caches;
4. Section 4.2.1, Spill of Fuel from Steel Drums on Tundra, states that steel drums will be stored in such a manner that they will not be susceptible to tipping over, rolling, or otherwise being unstable. AREVA should describe its steel drum storage method within the Plan, including height (number of drums), types of stops and contingencies to deal with drum movement;
5. Section 5.1, Spill Response Contact List, lists an INAC Water Resources Inspector as a point of contact. This contact should be changed to Peter Kusugak, Manager of Field Operations. Peter is based out of Iqaluit and can be reached by office telephone at (867) 975-4295, fax machine at (867) 979-6445, and by email at KusugakP@inac-ainc.gc.ca;
6. Section 5.3, Response to a Spill – Reporting, lists an INAC Water Resources Inspector as a point of contact. The INAC Manager of Field Operations should be notified of any spills. Detailed contact information is provided in comment number 5;
7. The Plan should include copies of the Nunavut Spill Report Form (found on the Nunavut Water Board website) and applicable Material Safety Data Sheets;
8. The Consolidation of Spill Contingency Planning and Reporting Regulations, provided under the Government of Nunavut's *Environmental Protection Act* should be consulted and adhered to by AREVA; and,
9. The Plan should include schematic diagrams of all areas within the project area where infrastructure has been or will be established (i.e., camp and fuel caches). Schematic diagrams should include contour lines (natural and modified), nearby freshwater sources, infrastructure, locations where spill response kits are mobilized, a true north reference, a legend (if needed) and be set to an appropriate scale.

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