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Department of Environment

Ministère de l'Environnement

Feb. 15, 06

Phyllis Beaulieu
Manager of Licensing
Nunavut Water Board

via Email to: licensing@nwb.nunavut.ca

**RE: 2BE-KIR0507 – KIRWAN LAKE EXPLORATORY DRILLING WATER
LICENSE AMENDMENT APPLICATION**

Dear Phyllis:

The Department of Environment (DOE) has reviewed the water license amendment application from Triex Minerals Corp. for conducting an uranium exploratory drilling near Kirwan Lake, and has the following comments and recommendations.

1. SPILL CONTINGENCY PLAN:

Based on the Government of Nunavut *Spill Contingency Planning and Reporting Regulations* and *A Guide to the Spill Contingency Planning and Reporting Regulations*, the DOE has the following comments to make:

- A site map should be included within the plan to illustrate the facility relationship to other areas that may be affected by a spill. The map should be large enough to include site location, nearby buildings, roads, culverts, drainage patterns, and any nearby bodies of water.
- The method for fuel storage indicated in the plan is insufficient. To prevent the spread of a spill, fuel stored in drums should be located, whenever practical, in a natural depression a minimum distance of 90 feet from all streams, preferably in an area of low permeability. All fuel drums should be situated in a manner that allows easy access in the events of spills. Large fuel caches in excess of 20 drums should be inspected daily.

2. ABANDONMENT & RESTORATION PLAN

Based on the DOE's *Environmental Guideline for Site Remediation*, the DOE has the following recommendations to make:

- A site map should be included within the A&R plan indicating the locations of fuel and chemical storage facilities, nearby buildings, drill sites and UTM coordinates with respect to nearby communities.
- The proponent contact information and emergency contact information should be included in the plan. There is no mention of this in the plan.
- The plan should also include information of fuel and chemical quantities brought on site, in addition to any fuel and chemicals left on site.
- A Waste Manifest must accompany all movements of hazardous wastes, and all parties must register with the EPS. There is no mention of this procedure in the spill plan.

3. WILDLIFE

This project area situates at an area where barren-ground caribou feed in the winter and migrate in early spring to east of Bathurst Inlet and return in late summer. The DOE advises the proponent to take the following actions when caribou migration is observed.

- During migration of caribou, the proponent shall not operate to block or cause substantial diversion to migrating caribou. Concentrations of caribou should be avoided by low-level aircraft at all times.
- The proponent shall cease activities that may interfere with migration, such as movement of equipment, until the migrating caribou have passed.

We thank NWB for giving us the opportunity to review and provide comments on the Triex's water license amendment application near Kirwan Lake. Please contact us if you have any further questions or comments.

Yours sincerely,

Original signed by

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