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Department of Environment

Ministère de l'Environnement

Feb. 12, 07

Richard Dwyer
Licensing Trainee
Nunavut Water Board

via Email to: licensingtrainee@nunavutwaterboard.org

RE: 2BE-KIR – TRIEX MINERALS CORP. – KIRWAN LAKE URANIUM EXPLORATION PROJECT

Dear Mr. Dwyer:

The Government of Nunavut, Department of Environment (DOE) has reviewed the water license amendment application from Triex Minerals Corp. for conducting uranium exploration 100 km southwest of Kugluktuk, 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:

- It is not clear if the on-site coordinator responsible for activating the spill plan in the case of spill is reachable at all times. It is required that the name, job title and 24 hour telephone number for the persons responsible for activating the plan be provided.

- 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.

- The proponent is recommended to utilize the newly developed spill report form in the case of spills, and to enter spill information via a computer so it is legible to recipients such as government agencies. The attached include the new spill form and instructions for completing the forms.

P. O. Box 1000, Stn. 1360 PH: (867) 975-7733
Iqaluit, Nu X0A 1H0 FX: (867) 975-7739

2. ABANDONMENT & RESTORATION PLAN

Based on the DOE's *Environmental Guideline for Site Remediation,* and Saskatchewan government's *Mineral Exploration Guidelines for Saskatchewan*, the DOE has the following recommendations to make:

- The DOE monitors the movement of hazardous wastes including waste fuel, from generators, carriers to receivers, through a tracking document (Waste Manifest). A Waste Manifest must accompany all movements, and all parties must register with the DOE. This registration can be done by contacting Rob Eno at (867) 975-7748 or reno@gov.nu.ca.

- Soil contaminated by fuel and hazardous chemicals (e.g., soils under fuel storage tanks) should be treated on site or removed to an approved disposal site and replaced with new soil.

- Drill cuttings with a uranium concentration of 0.05% or greater should be disposed of in the drill holes and be sealed.

- Drill holes that have uranium mineralization with content greater than 1% over the length of more than 1 meter with a meter-percent concentration greater than 5% should be sealed by cementing over the entire length of the mineralization zone and beyond, at least 10 meters above and below each mineralization zone.

- A core storage area should be located at least 100 meters from the high waterline of all water bodies.

- Gamma radiation levels of a long term core storage area measured at 1 meter from the surface should be maintained at 1 micro Sv and should never be exceeded over 2.5 micro Sv.

- Final inspections of the entire site should be conducted by the proponent and lead agency to make sure that all areas of the site have been reclaimed as much as possible to its previous condition. Soil samples and pictures before and after the project would make this process easy on the proponent and leading agencies involved in determining areas of concern.

3. INCINERATION (for medium camps of 10-50 people)

The proponent shall apply appropriate technologies to ensure complete combustion of wastes, and the use of a dual chamber, forced-air incinerator is recommended. The proponent shall make determined efforts to achieve compliance with the Canada-wide Standards for dioxins and furans and the Canada-wide Standard for mercury. Efforts should include the implementation of a comprehensive waste management strategy (especially waste segregation) that is designed to reduce and control the volumes of wastes produced, transported, and disposed of.

Waste wood treated with preservatives such as creosote, pentachlorophenol or heavy metal solutions should not be burned. Additionally, plastics, electrical wire, asbestos and building demolition wastes (except clean wood) are wastes likely to produce dioxins and furans when burned and should be excluded from incineration. Under no circumstance should hazardous wastes be managed through burning or incineration.

4. WILDLIFE

This project area situates in 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 implements 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. The proponent shall cease activities that may interfere with migration, such as movement of equipment, until the migrating caribou have passed.

- Low-level overflights should be avoided when one encounters concentrations of caribou, and flight altitude of at least 610 meters above ground is recommended.

The DOE thanks NWB for giving us the opportunity to review and provide comments on the Triex's water license amendment application. Please contact us if you have any further questions or comments.

Yours sincerely,

Original signed by

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Attachment 1: NT-NU Spill Report Form
Attachment 2: Instructions for Completing the NT-NU Spill Report Form