

SPILL CONTINGENCY PLAN Kuulu Project

Camp Coordinates: 522260 E, 6998689N (proposed)

Kivalliq Region, Nunavut

June 2017



PLAIN LANGUAGE SUMMARY

This Plan describes how people are trained and what needs to be done to respond safely to a spill of fuel or other hazardous material at the Kuulu Project, near Rankin Inlet, Nunavut.

SUMMARY OF EMERGENCY CONTACTS (Full List in Appendix A)

Organization	Contact	Location	Telephone/Radio		
	Project Manager	Onsite	Tbd		
	Brodie Sutherland	Offsite	403-829-9877		
NxGold	Camp Manager <i>Tbd</i>	Onsite	Tbd		
	Medic <i>Tbd</i>	Onsite	Tbd		
NT-NU Spill Centre	24 hour Spill Report Line	Yellowknife	867-920-8130		
Kivalliq Inuit Association (KIA)	Inspector	Rankin Inlet	867-645-5735		
Indigenous and Northern Affairs Canada	Field Operations	Iqaluit	867-975-4295		



REVISION HISTORY

Revision #	Date	Section	Summary of Changes	Author	Approver
1	March 2017	-	New document	S. Hamm	C. McFadden
2	June 2017	Appendix A	Appendix A Update ECCC contact number		C. McFadden



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1.0 INTRODUCTION

A hazardous spill is defined as the uncontrolled release of a hazardous chemical, oil, or biological material, either as a solid, liquid or gas. Spills associated with the NxGold Kuulu Project may occur in a variety of worksites, from the camp, to fuel caches and drill sites. Regardless of the type or quantity of hazardous chemical or substance involved, all worksites must implement measures to reduce the potential for spills and have an action plan for responding to spills. This *Spill Contingency Plan* (the Plan) describes methods for preventing and responding to hazardous material spills at the Kuulu Project site and considers the guidance provided in the documents listed in Table 1.

Table 1 Relevant guidance documents including legislation, permits and licences.

Document	Authority				
Contingency Planning and Spill Reporting in	Government of Nunavut				
Nunavut: A guide to the new regulations					
Environmental Protection Act, 1988	Government of Nunavut				
Spill Contingency Planning and Reporting	Government of Nunavut				
Regulations, 1993					
Mine Health and Safety Act, 1994	Government of Nunavut				
Mine Health and Safety Regulations, 1995	Government of Nunavut				
Canadian Environmental Protection Act, 1999	Environment and Climate Change Canada				
Environmental Emergency Regulations, 2003	Environment and Climate Change Canada				
Transportation of Dangerous Goods Act, 1992	Transport Canada				
Transportation of Dangerous Goods Regulations,	Transport Canada				
2012					
Hazardous Products Act, 1985	Health Canada				
Canada Labour Code, 1985	Employment and Social Development				
	Canada				
Canada Occupational Safety and Health	Employment and Social Development				
Regulation, 1986	Canada				
Water Licence	Nunavut Water Board				
Approval Without a Licence	Nunavut Water Board				
Land Use Licence	Kivalliq Inuit Association				
Land Use Permit	Indigenous and Northern Affairs Canada				

1.1 SCOPE

This Plan applies to material storage, handling and spill response associated with activities occurring in relation to the Kuulu Project including camp operation, drilling and fuel caches. Should winter resupply occur via winter trail a *Winter Trail Plan* will be drafted and submitted to relevant parties 90 days prior commencement of winter trail use.



1.2 **OBJECTIVES**

At NxGold, our personnel do what they can to prevent spills from occurring. We strive to meet and exceed best management practices, however we also recognize accidental spills and unplanned releases may occur. Accordingly, the objective of this plan is to:

- Ensure employees and contractors are trained to respond to spills in an effective manner;
- Outline appropriate spill response measures to ensure personnel safety and environmental protection.

1.3 SITE DESCRIPTION

The Kuulu Project is located 40 km northwest of Rankin Inlet, Nunavut between Meliadine Lake and Peter Lake (see Figure 1). The property abuts Agnico Eagle Mines claims to the south. The camp is located within the boundaries of the parcel as indicated in the Mineral Exploration Agreement R12-001 (522260 E, 6998689N (proposed)) and can support up to 60 persons. The site is largely accessible by air, with overland access for resupply via winter trail to Rankin Inlet. Regionally, the area is characterized as low arctic tundra with a summer active layer varying in thickness from 0.5 to 1 m.

1.4 PLAN MANAGEMENT

This Plan is intended to fulfill requirements associated with the water licence and land use licences and permits as well as existing legislation. The Plan will be updated to reflect final camp and fuel cache locations and capacities upon establishment, and to maintain a current contact list, as needed.

The Plan will be reviewed annually by the Project Manager and updated as needed. When material changes occur, the updated document will be provided to the Nunavut Water Board.

1.5 PLAN IMPLEMENTATION

This Plan is effective upon approval and is valid throughout all phases of the Project.

The Project Manager or designate is responsible for Plan implementation.

A copy of this Plan is maintained on site in the Office and within each spill kit deployed throughout the project area.



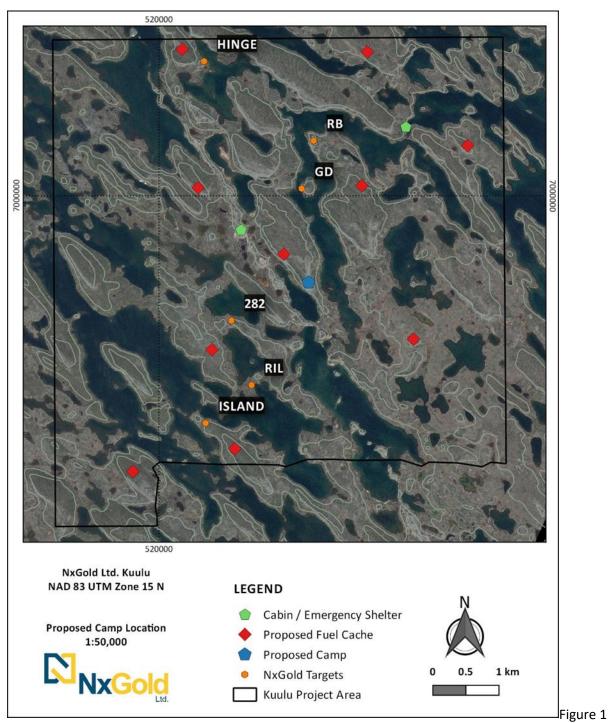


Figure 1 Kuulu Project site map.



2.0 ROLES AND RESPONSIBILITIES

NxGold Ltd. is responsible for activities associated with the Kuulu Project, including implementation and management of this Plan. NxGold's contact information is provided below.

NxGold Ltd.

Suite 3150, 1021 West Hastings Street Vancouver BC V6E 0C3 604 428 4112

Contact: Chris McFadden, CEO

Cell: 1 604 910 4859

Email: cmcfadden@nxgold.ca

2.1 STAFF, CONTRACTORS, SUPPLIERS AND VISITORS

All personnel conducting activities on site, including staff, contractors, suppliers and visitors, are required to implement this Plan as it pertains to their activities on site. Specifically, these responsibilities include:

- Take all necessary steps to minimize the chance of spills when working with chemicals, hydrocarbons, or radioactive materials;
- Cooperate fully with your supervisor and/or NxGold management to implement a spill prevention program in your work area;
- Only carry out duties and tasks that you are experienced at and trained to perform;
- Where there is uncertainty, ask questions and bring concerns to the attention of your supervisor when working with products that pose potential environmental and health risks;
- Respond to spills for which you are responsible or discover, and for which you have the requisite training and equipment; and
- Report all spills, no matter how small or seemingly insignificant, to your supervisor or NxGold management in a timely manner.

2.2 Managers and Supervisors

Managers and supervisors have a responsibility to ensure that staff, contractors, consultants and visitors have been trained in NxGold spill response expectations and procedures. Additional supervisor and manager responsibilities include:

- Maintain a no blame work environment in initiating a spill response and related follow-up actions;
- Ensure site-specific and material-specific training is provided to all departments and staff;
- Ensure there are appropriate and sufficient spill response supplies in their area for the hazard characteristics and quantities of materials stored or handled;
- Provide assistance in response to chemical spills including the coordination of additional response personnel or equipment;
- Maintain records regarding inspections, personnel training, emergency equipment testing and spill kit maintenance; and
- Contact appropriate government agencies and emergency services where appropriate.

An emergency contact list is provide in Appendix A.



3.0 SPILL PREVENTION

Successful spill prevention is largely based on safe storage and handling of materials and maintaining a known inventory of materials located within in suitable secondary containment.

3.1 PRODUCT INVENTORY

Table 2 provides a product inventory of typical products and volumes maintained on site during seasonal operations. Efforts are made to minimize the amount of materials stored on site during seasonal closure.

Table 2 Petroleum and chemical products typically stored on site.

Material	Amount	Location	Storage	
Diesel	48,000 L	205 L drums	Drills Camp Remote fuel cache	Secondary containment
Jet B	33,000 L	205 L drums	Camp Remote fuel cache	Secondary containment
Gasoline	3,300	205 L drums	Camp	Secondary containment
Propane	1,700 lbs	100 lb cylinders	Camp	Secondary containment
Various lubricants	180 gal	5 gal pails	Drills Camp	Secondary containment
Waste oil and related products (filters, rags)	Various	205 L drums or lined mega bags		Secondary containment
Glycol	180 gal	5 gal pails		Secondary containment
Salt	21,600 L	50 lb bags	Drills Camp	Secondary containment
Drill additives	180 gal	5 gal pails	Drills Camp	Secondary containment
Acetylene	200 lbs	100 lb cylinders	Camp	Secondary containment
Oxygen	200 lbs	100 lb cylinders	Camp	Secondary containment
Spent spill response materials	Various	205 L drums or lined mega bags	Camp	Secondary containment
Hazardous waste for backhaul and offsite disposal	Various	205 L drums, lined mega bags, or other TDG- approved container	Camp	Secondary containment



3.2 MATERIAL STORAGE AND INSPECTION

The materials listed in Table 2, along with their associated dispensing pumps and hoses, are stored in secondary containment, capable of containing 110% of the largest container. Secondary containment typically consists of Arctic-grade instaberms or equivalent. Secondary containment is periodically inspected and is maintained dry and is covered during seasonal closure.

Other considerations for proper material storage include the following:

- Store materials >31 m above the ordinary high water mark of any watercourse;
- Inspect material storage areas weekly or in accordance with permit and licence requirements, for capacity, ventilation, stability, organization, cleanliness and leak detection;
- Properly label storage containers and areas in accordance with the Workplace Hazardous Materials Information Management System (WHMIS);
- Identify fuel storage areas with multilingual signage (English, Inuktitut);
- Maintain storage area capacity such a that it is safely accessible;
- Store gas cylinders securely in an upright position;
- Store drums for immediate use in an upright position, and cached drums on their sides with bungs visible and in the 10 o'clock and/or 2 o'clock positions.

3.3 Material Handling and Disposal

Considerations for proper material handling include:

- Conduct refueling and equipment repair in a designated area, >31 m above the ordinary high water mark of any watercourse, within secondary containment or utilizing a drip tray;
- Use equipment or seek assistance when transporting heavy or awkward containers;
- Use funnels and spill containment trays when pouring or transferring chemicals from one container to another; and
- Utilize proper PPE when handling hazardous materials.

The majority of waste generated on site will be backhauled for disposal and/or treatment off-site at a suitable facility. Accordingly, considerations for preparing materials for off-site disposal include:

- Bulk like materials together (avoid co-mingling waste streams);
- Utilize proper containers suitable for the material and volume being stored;
- Properly label storage containers and areas in accordance with the WHMIS and TDG Regulations;
- Stage waste awaiting backhaul in areas with secondary containment;
- Dispose of waste on a regular basis and do not allow excess waste to accumulate in work areas;
- Backhaul hazardous waste annually.



4.0 SPILL RESPONSE

The nature of your response to a spill may vary depending upon the situation, the material spilled and location of the spill and the spill receiving environment. As materials on site that pose the highest spill risk due to their volume and handling frequency are all petroleum products or allied petroleum products, the response procedures outlined in this document are considered suitable under most scenarios.

In all spill response scenarios, the following steps should be taken to ensure employee safety and environmental protection are maintained:

- 1) Ensure your own safety and the safety of your coworkers by:
 - a) Stop what you are doing;
 - b) Stay clear of the spill;
 - c) Warn others nearby,
 - d) Shut down nearby equipment;
- 2) If required, assist injured or contaminated persons;
- 3) Assess the situation. Notify and report, as needed:
 - a) Emergency: if the spill poses a significant risk to persons, property or the environment, call for help and contact your supervisor or the Project Manager immediately;
 - b) Non-emergency: proceed with appropriate spill response;
- 4) Consult the MSDS for exposure risk;
- 5) Put on appropriate PPE (gloves, safety glasses, apron, footwear);
- 6) Contain the spill as outlined in the following sections;
- 7) Label and store containers of waste and spent spill response materials in accordance with Sections 3.2 and 3.3;
- 8) Conduct spill reporting as outlined in Section 5;
- 9) Where required, participate in incident investigations and follow-up measures.

4.1 SPILLS TO TUNDRA

In the event of a spill to the ground surface or tundra:

- If flowing fluid:
 - o trench or ditch to intercept or contain fluid where feasible; or
 - construct a berm or barrier downslope of the spill. Use soil, or synthetic, impervious sheeting;
- Recover free product through manual or mechanical means including shovels, heavy equipment and pumps;
- Absorb petroleum residue with synthetic sorbent socks, pillows, pads or granular materials;
- Mechanically recover contaminated rock, soil and vegetation using a shovel;
- Backfill any excavated areas with available soil, sand gravel or bentonite.



4.2 SPILLS TO SNOW

In the event of a spill to snow:

- If flowing fluid, construct an ice berm or barrier downslope of the spill by compacting snow and spraying with water (if conditions permit) or use synthetic, impervious sheeting;
- Compact snow around the perimeter of the spill area;
- Locate the low point of the spill area and clear channels in the snow towards this low point, to allow free product to flow into the low point;
- Recover free product through manual or mechanical means including shovels, heavy equipment and pumps, or if approved, combust in situ;
- Absorb petroleum residue with synthetic sorbent socks, pillows, pads or granular materials;
- Mechanically recover all contaminated snow and ice.

4.3 SPILLS TO ICE

In the event of a spill to ice:

• Follow procedures for a spill to snow.

In the event that materials penetrate and are under the ice:

- Drill holes through ice using ice auger to locate fuel/petroleum product;
- Once detected, cut slots in the ice using chain saws and remove ice blocks. Light non-aqueous phase liquids will collect in openings in the ice;
- Recover free product through manual or mechanical means including scoops or pumps, or, if approved, combust in situ;
- Absorb petroleum residue with synthetic sorbent socks, pillows or pads.

4.4 SPILLS TO WATER

In the event of a spill to water:

- Monitor the movement of the spilled materials from a helicopter;
- Deploy and secure booms around the perimeter of the spilled material;
- Absorb petroleum residue with synthetic sorbent socks, pillows or pads;
- Recover free product by floating absorbent socks, pillows or pads on the water surface, deploying a skimmer, or, if approved, combust in situ or apply chemical dispersants.



4.5 SPILL KITS

Spill kits on site may vary based on location and supplier. Contents of typical small and large kits are presented below.

A typical small (68 L) spill kit may contain the following:

- 50 oil sorbent pads;
- 4 small pillows;
- 2 large pillows;
- 4-4 inch socks;
- 1 plug patty (instant leak-stop);
- 1 pair of nitrile gloves;
- 1 pair of splash goggles; and
- 1 disposable respirator.

A typical large (220 L) spill kit may contain the following:

- 4 socks (3" x 10');
- 5 socks (3" x 4');
- 50 pads;
- 5 pillows;
- 1 roll;
- 1 drain cover;
- 1 caution tape;
- 2 pairs nitrile gloves;
- 2 pairs safety goggles;
- 2 protective coveralls;
- 10 disposable bags; and
- 1 instruction book.

Spill kits are inspected at the start of each field season and following each spill response to ensure contents are sufficient.

Additional spill response materials will be stored on site in the Shop and include a trash pump, several shovels, extra nitrile gloves, extra sorbent pads and extra granular sorbent material.



5.0 REPORTING AND DOCUMENTATION

5.1 MATERIAL SAFETY DATA SYSTEM

Material Safety Data System (MSDS) sheets are maintained on site in the Office, the Shop, the Driller's Shack and the Medical Tent. The MSDS sheets are reviewed annually at the start of the field program to ensure that appropriate and current MSDS sheets are available.

5.2 SPILL REPORTING

As mentioned in Section 4, spill reporting is a key component of the spill response efforts. Once it is safe to do so, the first responder shall collect the following info:

- Date and time of spill;
- Location of spill;
- Direction the spill is moving;
- Name of contact person at location of spill, and phone number where applicable;
- Material and quantity spilled;
- Cause of spill;
- Whether spill is contained or stopped;
- Action taken to contain, recover, clean-up and dispose of spilled material

All spills and unplanned releases are reported to the Project Manager. Materials and quantities listed in Appendix B that are spilled or released in an unplanned manner require external reporting. In the event of a reportable spill and once it is safe to do so, the Project Manager or designate will initiate notification of the following (contact info is provided in Appendix A):

- NxGold Project Manager;
- NT-NU 24-hour spill report line;
- Kivalliq Inuit Association;
- INAC Inspector.

Following initial notification, the Project Manager will complete the NT-NU Spill Reporting Form (Appendix C). The completed form must be submitted to the INAC Inspector and the KIA within seven calendar days of the incident.

A detailed follow-up report must be submitted to the INAC Inspector within 30 days of the incident.

6.0 TRAINING

All attendees to site participate in a site orientation which outlines onsite hazards and roles and responsibilities regarding material handling, storage and spill response. Spill kit contents and deployment are periodically reviewed at weekly site safety meetings.

All attendees to site must be trained in WHMIS.



7.0 REFERENCES

Canada Labour Code R.S.C., 1985, c. L-2

Canada Occupational Safety and Health Regulation. 1986. SOR/86-304

Canadian Environmental Protection Act (CEPA). S.C. 1999, c.33

Hazardous Products Act R.S.C., 1985, C. H-3

Environmental Emergency Regulations SOR/2003-307

Environmental Protection Act. R.S.N.W.T. 1988, c.E-7

Mine Health and Safety Act, SNWT (Nu) 1994, c25

Mine Health and Safety Regulations, NWT Reg (Nu) 125-95

Spill Contingency Planning and Reporting Regulations R-068-93

Transportation of Dangerous Goods Act (TDGA). S.C. 1992, c.34

Transportation of Dangerous Goods Regulations. SOR/2012-245

Government of Nunavut. Contingency Planning and Spill Reporting in Nunavut: A guide to the new regulations.



APPENDIX A: EMERGENCY CONTACTS

Organization	Contact	Location	Telephone/Radio		
	Project Manager	Onsite	Tbd		
	Brodie Sutherland	Offsite	403-829-9877		
NxGold	CEO	Offsite	604-428-4112		
	Camp Manager	Onsite	Tbd		
	Medic	Onsite	Tbd		
NT-NU Spill Centre	24 hour Spill Report Line	Yellowknife	867-920-8130		
Kivalliq Inuit	Lands Department	Rankin Inlet	867-645-5731		
Association (KIA)	Inspector	Rankin Inlet	867-645-5735		
Indigenous and	Field Operations	Iqaluit	867-975-4295		
Northern Affairs Canada	Resource Management Officer	Rankin Inlet	867-645-2831		
Environment and Climate Change Canada	Operations Manager	Yellowknife	867-669-4730		
Fisheries and Oceans Canada	Regional Office	Rankin Inlet	867-645-2871		
GN Department of Environment	Director Environmental Protection	Iqaluit	867-975-7748 867-360-6338		
Nunavut Water Board	Executive Director	Gjoa Haven			
Agnico Eagle Ltd.	Meliadine Site Manager	Meliadine Camp	819-759-3002		
Kivalliq Health Centre		Rankin Inlet	(867) 645-8300		
RCMP		Rankin Inlet	(867) 898-0123 or 1111		
Qiniqtiit Search and Rescue		Rankin Inlet	867-645-2014		
Mines Inspector		Iqaluit	1-800-661-0792		

SITE RADIO CHANNELS

Channel	Contact					
1	General					
2	Medic/Emergency					
3	Aviation					
4	Drills					

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APPENDIX B: IMMEDIATELY REPORTABLE SPILLS

Unplanned releases of the materials listed below will immediately be reported to the NT-NU 24 Hour Spill Report Line, Yellowknife, Tel: 867-920-8130 (Email: spills@gov.nt.ca; Fax: 867-873-6924) using the NT-NU Spill Report.

Description of Contaminant	Amount Spilled	TDG Class
Explosives	Any amount	1.0
Compressed gas (Flammable)	Any amount of gas from containers with a capacity greater than 100L	2.1
Compressed gas (Non-corrosive, non-flammalble)	Any amount of gas from containers with a capacity greater than 100L	2.2
Compressed gas (toxic/corrosive)	Any amount	2.3
Flammable Liquid	≥ 100L	3.1 3.2 3.3
Flammable Solid	≥ 25kg	4.1
Spontaneously combustible substance	≥ 25kg	4.2
Water reactant substances	≥ 25kg	4.3
Oxidizing substances	≥ 50 L or 50 kg	5.1
Organic peroxides	≥1 L or 1 kg	5.2
Toxic/poisonous substances	≥5 L or 5 kg	6.1
Infectious substances	Any amount	6.2
Sewage and Wastewater (Unless authorized)	Any amount	6.2
Radioactive substance	Any amount	7.0
Corrosive substances	≥5 L or 5 kg	8.0
PCB mixtures of 5 or more ppm	≥ 0.5 L or 0.5 kg	9.1
Miscellaneous substances	Not defined	9.1
Environmentally hazardous substances intended for disposal	≥ 1 L or 1 kg	9.2
Other contaminants	≥ 100 L or 100 kg	None



APPENDIX C: NT-NU SPILL REPORT FORM

Form is also available online at:

http://www.gov.nu.ca/sites/default/files/NT%20NU%20Spill%20Report%20Form_0.pdf





Canada NT-NU SPILL REPORT

OIL, GASOLINE, CHEMICALS AND OTHER HAZARDOUS MATERIALS

NT-NU 24-HOUR SPILL REPORT LINE

TEL: (867) 920-8130 FAX: (867) 873-6924 EMAIL: spills@gov.nt.ca

REPORT LINE USE ONLY

Α	REPORT DATE: MONTH – DAY	Y – YEAR REPO		REPOR	PORT TIME				RIGINAL SPILL REPO	ORT,	DEDODT NUMBER	
/ \	OCCURRENCE DATE: MONTH	1 – DV.	V_VEAR	OCCURRENCE TIME UF			PDATE #		REPORT NUMBER			
В	COOCH LENGE BALL MOINT	. 571						THE ORIGINAL SPILL	REPORT	-		
С	LAND USE PERMIT NUMBER (IF APPLICABLE) WATER LICENCE NUMBER (IF A						(IF A	PPLICABLE)				
D	GEOGRAPHIC PLACE NAME (OR DI	STANCE AND DIRECTION	I FROM NAMED L	OCATIO	N	REGION	□ NUNAVU	JT	☐ ADJACENT JURI	SDICTION	OR OCEAN
_	LATITUDE					LO	NGITUDE				02.0	0.1.002.1.1
Е	DEGREES	MIN	UTES	SECONDS		DE	GREES			MINUTES	S	ECONDS
F	RESPONSIBLE PARTY OR VE	SSEL	NAME	RESPONSIBLE	PARTY A	ADDRI	ESS OR OFFIC	CE LOCATIO	ON			
G	ANY CONTRACTOR INVOLVED	D		CONTRACTOR	ADDRES	SS OR	OFFICE LOC	ATION				
	PRODUCT SPILLED			QUANTITY IN LI	TRES, K	ILOGI	RAMS OR CUI	BIC METRE	ΞS	U.N. NUMBER		
Н	SECOND PRODUCT SPILLED	(IF AF	PPLICABLE)	QUANTITY IN LI	TRES, K	ILOGI	RAMS OR CUI	BIC METRE	ΞS	U.N. NUMBER		
I	SPILL SOURCE			SPILL CAUSE						AREA OF CONTAMIN	NATION IN	SQUARE METRES
J	FACTORS AFFECTING SPILL (OR RE	ECOVERY	DESCRIBE ANY	ASSIST	ANCE	REQUIRED			HAZARDS TO PERSONS, PROPERTY OR ENVIRONMENT		
K												
L	REPORTED TO SPILL LINE BY	1	POSITION		EMPLO	YER			LOC	OCATION CALLING FROM TELEPHONE		
M	ANY ALTERNATE CONTACT POSITION EN					YER				ERNATE CONTACT	,	ALTERNATE TELEPHONE
				REPORT LIN	E USE (ONLY	,		200.	7.1.1011		
Ν	RECEIVED AT SPILL LINE BY		POSITION		EMPLO	YER			LOC	ATION CALLED		REPORT LINE NUMBER
IN			STATION OPERATOR						YELL	LOWKNIFE, NT		867) 920-8130
	LEAD AGENCY CCG GNWT GN ILA INAC NEB TO			□ NEB □ TC	_	SIGNIFICANCE □ MINOR □ MAJOF						
	AGENCY CONTACT NAME				CO	CONTACT TIME				REMARKS		
	LEAD AGENCY FIRST SUPPORT AGENCY					-			+			
SECO	SECOND SUPPORT AGENCY								\dagger			
THIRD SUPPORT AGENCY												