

# Type B Water Licence Renewal Application Project Description

Submitted January 15, 2014



#### 1.0 Introduction

The current application is for the renewal and amendment of Type "B" Water Licence 2BB-MRY1114 (the "**Licence**"). All of the activities listed under this renewal application have been permitted in the past and are common to exploration properties throughout Nunavut.

### 2.0 Summary of Planned Activities within Exploration Area

Baffinland Iron Mines Corporation ("**BIMC**") plans to continue the following activities on its mineral leases in the Qikiqtani Region of Nunavut:

- Mineral exploration drilling;
- Surface mineral exploration activities including mapping, sampling, geophysical surveys, geochemical surveys, mechanical trenching and stripping of surficial overburden;
- Geotechnical drilling programs;
- Activities in support of scientific and engineering studies related to the advancement of future expansion of the Mary River Project, including geotechnical investigations;
- Potential "Bulk Sampling Programs" at Deposit 1;
- · Construction and use of airstrips and icestrips;
- Construction of winter roads, stream/river crossings;
- Sealift operation and establishment and use of laydown area;
- Potential for establishing future satellite camps to support exploration and drilling activities on BIMC's mineral claims; and,
- Progressive reclamation programs associated with exploration programs.

Several of these activities require licencing under a Type B Water Licence pursuant to the *Nunavut Waters and Nunavut Surface Rights Tribunal Act*.

### 3.0 Project Name

BIMC is requesting that the Board continue to refer to the "Mary River Exploration Project" within the Type B Water Licence.

# 4.0 Extent of the Project

The application encompasses activities on all of BIMC's mineral leases in the Qikiqtani Region of Nunavut. The "Mary River Exploration Project" will rely in part on the infrastructure developed for the Mary River Project and permitted under NIRB Project Certificate 005 and Type A Licence 2AM-MRY1325, however all activities undertaken as part of the Mary River Exploration Project will be exploration and not production activities.

# 5.0 Description of the Mary River Exploration Project

### 5.1 Mineral Exploration Drilling

The main focus of this Licence is for on-going mineral exploration activities on all of BIMC's mining leases and mineral claims in the North Baffin Region. BIMC has already identified a number of promising deposits which will necessitate further exploration drilling and potentially bulk sampling to quantify



resources. The current drilling targets focus on mining leases 2483, 2484 and 2485 (Deposits No. 2 and 3, Deposit No 1 and Deposit No. 4) as well as contiguous mineral claims (Deposits No. 5 and vicinity as well as other mineral targets). As more information is generated focus may turn to other prospects in the area. Surface exploration activities will include drilling as well as trenching.

Access to specific areas may require the construction of pioneer trails or roads as exploration drilling intensifies at a particular deposit and or prospect. The NWB will be informed of the specific locations of such developments as they are identified.

#### 5.2 Geotechnical Drilling Programs

Geotechnical investigations are an integral part of Project development. BIMC will continue its geotechnical drilling program along the proposed railway corridor of the Mary River Project. In addition, should the need arise for the development of new infrastructure or water crossings, geotechnical investigations will be necessary in other Project areas. The NWB will be informed of the specific locations of such developments as part of BIMC's Annual Report.

#### 5.3 Scientific and Engineering Studies

Scientific and engineering studies are also an integral part of Project development. These studies are intended to support engineering design, environmental studies, and, support environmental management. The NWB will be informed of the extent of these studies in BIMC's Annual Report.

#### 5.4 Revision to Definition of "Secondary Containment"

The current licence definition of "secondary containment" is as follows:

"Secondary Containment" means an impermeable structure, external to and separate from primary containment, which prevents unplanned spills of hazardous materials and provides a minimum capacity of 110% of the original vessel. Where multiple vessels are stored within the containment, it must provide a minimum capacity equal to the sum of the largest vessel and 10% of the aggregate volume of all other vessels located in the containment. This structure shall also provide containment and control of hoses and nozzles;

Baffinland wishes to request that the NWB clarify this definition to confirm that double walled hoses and tanks would meet the definition of "secondary containment" and that these measures are within the NWB's understanding of "impermeable structure, external to and separate from primary containment."

### 5.5 Bulk Sampling Programs

A "bulk sampling campaign" is an effective way of securing customer acceptance for the iron ore produced at the Mary River Project. A Bulk Sampling Program for Deposit No. 1 was successfully completed in 2008 (approved under the existing Type B Licence) which enabled BIMC to proceed with the commercial development of the Mary River Project.

Part D, Item 7, of the current Licence authorizes further Bulk Sampling:

"The Licensee shall submit to the Board, for approval, within sixty (60) days prior to the commencement of any further Bulk Sampling activities under this Licence, a revised Bulk



Sampling Management Plan which addresses Acid Rock Drainage and Metal Leaching potential through the verification of Kinetic testing, Waste Rock Storage and Ore Storage management"

However, "Bulk Sampling Program" is defined as: "means potential activities designed and conducted to further investigate the metallurgical properties of the claim blocks associated with Deposit No. 1 at the Mary River Project during the 2014 period". BIMC wishes to request that the phrase "during the 2014 period" be removed from the definition of "Bulk Sampling Program", to permit BIMC flexibility to proceed with the program at any time during the licence term.

Recognizing the importance of the of a Bulk Sampling Management Plan, BIMC will advise the NWB of any further Bulk Sampling activities in accordance with Part D, Item 24, as well as provide, for approval by the Board, an updated Bulk Sampling Management Plan should the BIMC contemplate additional Bulk Sampling activities from Deposit No.1.

#### 5.6 Airstrips and Ice Strips

As noted in section 5.8 below, it is anticipated that most satellite camps would be serviced by helicopter, especially in the early years of exploration. However, in later years, the construction of airstrips and ice strips may be required at satellite camps. The construction of airstrips and ice strips may be required for the on-going development of the Mary River Project as well as for potential access to future exploration targets within BIMC's mineral claims and mining leases.

For future exploration on BIMC's existing mineral claims and mining leases, BIMC foresees the potential need to occasionally use airstrips and ice strips in in order to deliver equipment, personnel and or material required for to support exploration drilling in advance of the summer drilling season. Such icestrips would be located in close proximity to the proposed satellite camp locations illustrated in Appendix 9 and referenced in section 5.8. BIMC would propose to provide 30 days notice to the Board prior to constructing any icestrips.

Icestrips would be constructed by withdrawing water from a lake for repeated flooding of the landing strip until the ice thickness can safely support the landing plane/cargo. Construction of winter ice landing strips will require minimal water withdraw from the lakes. In order to prevent adverse effects on fish and fish habitat, for the construction of ice strips on lakes, BIMC will abide by the DFO Protocol for Winter Water Withdrawal in the NWT (2005). BIMC will provide information to the Board with respect to specific locations of any water bodies to be used as icestrips or any land based icestrips to be constructed using water.

#### 5.7 Winter Roads and Winter Stream/River Crossings

BIMC foresees the need to construct winter roads and winter stream/river crossings to gain access to some of its mining claims and mineral leases in order to for the purpose of the delivery of equipment and or material that will be required for to support exploration drilling in advance of the summer drilling season. Temporary construction of winter roads and stream/river crossings may also be required for the construction of the railway bridges which has been authorized under Project Certificate No. 5 and Type A Licence 2AM-MRY1325. As noted in section 5.8 below, it is anticipated that most satellite camps would be serviced by helicopter, especially in the early years of exploration.

The construction of winter roads is an established practice in Nunavut. Winter road portages are constructed with compacted snow and water withdrawal from water bodies adjacent to the winter road corridor. Ice bridges and snow fills are two methods used for temporary winter access in remote areas. Ice bridges are constructed on larger watercourses that have sufficient stream flow and water depth to prevent the ice bridge from coming into contact with the stream bed or restricting water movement



beneath the ice. Snow fills, however, are temporary stream crossings constructed by filling a stream channel with clean compacted snow.

In order to prevent adverse effects on to fish and fish habitat, for during the construction and operation of winter roads, streams/river crossings, BIMC will abide by DFO Operational Statement for Ice Bridges and Snow Fill, and, DFO Protocol for Winter Water Withdrawal in the NWT (2005).

BIMC proposes that a condition be included that would enable BIMC to proceed with the development of winter roads after informing the Board of the anticipated location, providing maps and other details. It is expected that any winter roads would be located in close proximity to the proposed satellite camp locations illustrated in Appendix 9 and referenced in section 5.8.

#### 5.8 Satellite Camps

In order to support exploration and drilling activities on BIMC's extensive mineral claims in the North Baffin Region, BIMC foresees the potential need to establish satellite exploration camps. Under this renewed Licence, BIMC proposes that a condition be included that would enable BIMC to proceed with the development of satellite camps.

The table below identifies locations of potential satellite camps related to ongoing mineral exploration activities on BIMC's mineral claims (refer to Map presented in Appendix 9). It is unlikely that all of these satellite camps will be operated simultaneously, however it is noted that total licence-wide operations would limit domestic use of water to a proposed total of 49m<sup>3</sup> per day.

Potential Exploration Camp	Map Sheet Number	Mineral Exploration Target	Objective
А	37G/11	Long Lake Prospect	Access and service to mineral claims within Map sheets 37G-11 and 37G-12
В	37G/6	Turner River Prospect	Access and service to mineral claims within Map sheets 37G-6, 37G-7 and 37G-11
С	37F/15	Cockburn River Prospect	Access and service to mineral claims within Map sheets 37G-1, 37G-2, 37F-16 and 37F-15
D	37F/16	Rowley River Prospect	Access and service to mineral claims within Map sheets 37F-16, 37F-9 and 37E-13
E	37C/9	Eqe Bay Prospect	Access and service to mineral claims within Map sheets 37C-9 and 37C-16
F	37C/9	Eqe Bay Prospect	Access and service to mineral claims within Map sheets 37C-9 and 37G-7
G	37C/15-16	Isortoq Prospect	Access and service to mineral claims within Map sheets 37F-1 and 37F-8

Baffinland proposes that prior to establishing any satellite camp in the above noted locations, that it will provide the Board with 30 days or more advance notice and that such notice will include specific information such as the associated power supply and fuel depot, method of sewage disposal, and if required sewage treatment, incineration equipment, and waste management facilities. Camp size will be limited to 49 persons or less per camp. Water sources would be proximate to each camp location and would be identified as part of Baffinland's notice, and in any event would comply with the protocols



identified at Section 6.0 below. In the unlikely event that Baffinland wishes to establish satellite camps in any other locations, it would provide advance notice to the Board of 60 days or more.

With respect to security matters relating to satellite camps, all notices to the board would include a proposed reclamation security increase pertaining to the establishment of the satellite camp for the board's consideration.

#### 5.9 Sealifts and Laydown Areas

BIMC's mineral claims extend south to the Nuviut Peninsula (Eqe Bay/Isortoq Prospects) where mineral targets are located adjacent to coastal areas not serviced by Steensby Port. Given the distance between Steensby Port and the Nuviut Peninsula, exploration activities in this area may require occasional sealifts for the delivery of equipment, material, supplies and camps, required to carry out a future exploration program. BIMC requests that the renewed Licence include a provision for the execution of sealifts for mobilization and demobilization of equipment and supplies along coastal areas adjacent to BIMC's mining leases and mineral claims. It is anticipated that the Steensby Inlet Camp would continue to be supported by annual or bi-annual sealifts.

The NWB will be informed of such developments as they are identified. Details of these activities would be provided with such notification (coordinates, size, duration and other characteristics of the activity).

#### 5.10 Fuel Cache, Storage and Supply

Fuel will be supplied from the existing bulk fuel storage facilities authorized under Type A Licence 2AM-MRY1325 or by barrelled fuel delivered by sealift. Small storage tanks and fuel cache (fuel barrels) are already installed/stored and authorized at Steensby and Mid-Rail pioneer camps.

In the future, double walled storage tanks up to 4,000 L and barrelled fuel would be required at the future exploration camps and exploration site areas. It is anticipated that a total of up to 20 m³ of fuel could be delivered and stored at any one time at existing and new satellite exploration camps. Barrel fuel caches and tanks will incorporate field constructed secondary containment measures to minimize the potential effect of spills and leakage.

#### 5.11 Abandonment and Reclamation

The renewed Licence authorizes the reclamation activities described in the updated Abandonment and Reclamation Plan for installations and activities covered by this licence. BIMC proposes to further update this plan following licence renewal.

BIMC intends to carry out progressive reclamation of components of the project no longer required for the exploration activities. The sites will be restored in consultation with AANDC and QIA reclamation objectives. All sumps will be backfilled to the pre-existing natural contours of the land.

BIMC will remove from the site, all infrastructure and site materials, fuel caches, drums, barrels, buildings and contents, docks, water pumps and lines, material and equipment prior to the expiry of this Licence. Roads and airstrips, if any, will be re-graded to stable conditions that approximate the natural contour to minimize risk of erosion.

Unless otherwise identified within the approved Abandonment and Reclamation Plan under this Licence, BIMC will remove culverts (if installed) and open the natural drainage channels. In carrying out this activity, measures will be implemented to minimize erosion and sedimentation.



Areas that have been contaminated by hydrocarbons from normal fuel transfer procedures will be reclaimed to meet objectives as outlined in the Government of Nunavut's Environmental Guideline for Site Remediation, 2010. The use of reclaimed soils for the purpose of back fill or general site grading may be carried out only upon consultation and approval by the Government of Nunavut, Department of Environment and an Inspector.

## 6.0 Water Use and Water Supply

As per the aforementioned description, BIMC wishes to be authorized to undertake the following uses of water under this renewed licence:

- Drill water use to support ongoing exploration and geotechnical drilling for the life of the Project (specific sources identified prior to drilling);
- Domestic water supply for future satellite exploration camps (see more details at section 5.8 above);
- Water requirement for construction of potential future ice strips;
- Construction of winter roads associated with on-going exploration and geotechnical activities.

As the primary focus of this renewed licence is for exploration activities, the specific sources of water cannot be identified at this time. Appropriate sources will depend on the locations of the targets. BIMC will report precise locations of water supply and quantities drawn in its annual report.

Streams or lakes will not be used as a water source unless authorized and approved by the Board in writing. BIMC will, at least thirty (30) days prior to the commencement of use of water, submit the following to the Board for approval, in cases where BIMC requires water in sufficient volume that the source water body may potentially be drawn down:

- o volume required,
- o hydrological overview of the water body,
- o details of impacts, and,
- o proposed mitigation and monitoring measures.

BIMC will equip all water intake hoses with a screen of an appropriate mesh size to ensure that fish are not entrained and will withdraw water at a rate such that fish do not become impinged on the screen.

BIMC will not remove any material from below the ordinary high water mark of any water body unless authorized. BIMC will abide by the DFO Protocol for Winter Water Withdrawal in the NWT (2005).

BIMC activities will not cause erosion to the banks of any body of water and shall provide necessary controls to prevent such erosion.

BIMC will maintain the Water Supply Facilities to the satisfaction of the inspector.

#### 7.0 Waste Management

Types of Wastes

For future satellite camps and drilling activities, the types of wastes generated will be similar in nature and volume to the types of wastes currently generated by the Steensby pioneer camp. Waste consists mainly of camp wastes and waste from drilling activities.



Drilling waste material consist mainly of rock chips, mud, spent brine. These wastes will be disposed in a properly constructed sump or an appropriate natural depression located at a distance of at least thirty-one (31) metres from the ordinary high water mark of any adjacent water body, where direct flow into a water body is not possible and no additional impacts are created. BIMC's commitments related to the undertaking of drilling activities are outlined in Section 10 of this document.

#### Waste Management

All wastes generated by activities permitted under this Licence will be managed in accordance to the terms and conditions of the 2AM-MRY1325 Licence. The Waste Management Plan approved by the Board under 2AM-MRY1325 Licence will contain an addendum which addresses waste management associated with the specific activities of the renewed Type B Licence. This addendum will deal explicitly with waste management for facilities approved under this renewed Type B Licence. BIMC will update this addendum annually and submit any changes, complete with a record of revision, to the Board for review by March 31st of the year following the update.

For activities regulated under this Licence, BIMC will locate areas designated for waste disposal at a minimum distance of thirty-one (31) metres from the ordinary high water mark of any water body such that the quality, quantity or flow of water is not impaired, unless otherwise approved by the Board in writing.

BIMC will dispose of all acceptable food waste, paper waste in an incinerator. Untreated wood products and cardboard can be open burned. Prior to open burning at exploration camps, BIMC will submit to the NWB for its approval, an open burn procedure that will be developed in accordance with appropriate Government of Nunavut guidelines.

BIMC will not open burn plastics, wood treated with preservatives, electric wire, Styrofoam, asbestos or painted wood so as to prevent the deposition of waste materials of incomplete combustion and/or leachate from contaminated ash residual, from impacting any surrounding waters, unless otherwise approved by the Board in writing.

BIMC will backhaul and dispose of all solid wastes generated by the Mary River Exploration Project at the Mary River landfill site approved under Type A Licence 2AM-MRY1325 or to other accredited disposal facilities via sealift.

BIMC will backhaul and dispose of all hazardous wastes, waste oil and non-combustible waste generated through the course of the operation, at a licensed waste disposal site.

BIMC will maintain records of all waste backhauled and records of confirmation of proper disposal of backhauled waste. These records shall be made available to an Inspector upon request by the Board in writing.

For each camp, BIMC will contain grey water in a sump located at a distance of at least thirty-one (31) metres above the ordinary high water mark of any water body, at a site where direct flow into a water body is not possible and no additional impacts are created, unless otherwise approved by the Board in writing.

BIMC will contain all other toilet wastes in latrine pits or use incineration, chemical, portable or composting toilets. Latrine pits shall be located at a distance of at least thirty-one (31) metres above the ordinary high water mark of any water body, treated with lime and covered with native material to achieve the pre-existing natural contours of the land prior to abandonment. In the event a sewage treatment plant is required at any of its existing or satellite exploration camps, the NWB will be informed of such development.

BIMC will notify an inspector at least ten (10) days prior to any discharge from facilities under this part.



All Effluent discharged from any future Bulk Sample sites, weathered ore stockpiles, lump ore and fine ore stockpiles will not exceed the Effluent quality limits established in Type A Licence 2AM-MRY1325.

All Sewage Effluent discharged from the pioneer camps or future satellite camps Waste Water Treatment Facility will not exceed the Effluent quality limits established in Type A Licence 2AM-MRY1325.

All grey water generated at the pioneer camps or future satellite camps, not directed to the a sewage treatment facility, will be channeled to a sump located at a distance of at least thirty one (31) metres above the ordinary high water mark of any water body, at a site where direct flow into a water body is not possible and no additional impacts are created, unless otherwise approved by the Board.

BIMC will maintain all constructed facilities, including the fresh water intakes, Waste Water Treatment Facilities, to the satisfaction of an Inspector.

### 8.0 Camp Operation

Future camps will be located such as to minimize impacts on surface drainage. BIMC will not erect temporary camps or store material on the surface of frozen streams or lakes including the immediate banks except what is for immediate use.

All camp activities will be conducted in such a way as to minimize impacts on surface drainage. BIMC will immediately undertake any corrective measures in the event of any impacts on surface drainage.

# 9.0 Earthworks, Airstrips, Roads, Streams and Water Crossings

General Earthwork, Roads and Laydown Area

BIMC will not utilize any equipment or vehicles in the course of this undertaking unless the ground surface is in a state capable of fully supporting the equipment or vehicles and will minimize any rutting or gouging. Overland travel of equipment or vehicles shall cease if rutting occurs.

BIMC will ensure that all fill material used during construction of laydown area and work pad is from an approved source and is free of contaminants. To minimize impacts on surface drainage, BIMC will prepare all sites in such a manner as to minimize rutting of the ground surface.

Equipment storage holding areas should be located on gravel, sand or other durable land, a distance of at least thirty-one (31) metres above the ordinary high water mark of any water body in order to minimize impacts on surface drainage and water quality.

BIMC will designate areas for the deposition of excavated and stockpiled materials that is at least thirty-one (31) metres above the ordinary high water mark of any water body.

With respect to access road, pad construction or other earthworks, BIMC will avoid the deposition of debris or sediment into or onto any water body. These materials will be disposed of at a distance of at least thirty-one (31) metres from the ordinary high water mark in such a manner that they do not enter the water. BIMC will ensure that any chemicals or waste associated with undertakings do not enter any water body

Water Crossings



For construction of water crossings, BIMC will not cut any stream bank or remove any material from below the ordinary high water mark of any water body unless authorized by the Board. Stream crossings will be located to minimize approach grades. Approaches will be stabilized during construction and upon completion of the project, to control runoff, erosion and subsequent siltation to any water body.

BIMC will implement sediment and erosion control measures prior to and maintain such measures during construction and operation to prevent entry of sediment into water. To the extent practicable, BIMC will limit any in-stream activity to low water periods. In-stream activity will be avoided during fish migration.

Machinery will not travel up the stream bed and fording of any water body will be kept to a minimum. Equipment used will be cleaned and free of oil and grease and maintained free of fluid leaks. BIMC will ensure that pollutants from machinery fording the crossings do not enter water.

Winter Roads, Winter Airstrips, Ice Bridges and Snow Fill

Winter roads, ice strips, river, stream or lake crossings, including ice bridges, will be constructed entirely of water, ice or snow. BIMC will minimize disturbance by locating ice bridges in an area that requires the minimum approach grading and the shortest crossing route. Stream crossings shall be removed or the ice notched prior to spring break-up.

For all winter works located on and around water bodies, streams or river, BIMC will abide by the DFO Operational Statement for Ice Bridges and Snow Fill, and, DFO Protocol for Winter Water Withdrawal in the NWT (2005).

## 10.0 Drilling Operations

BIMC will not conduct any land-based drilling within thirty-one (31) metres of the ordinary high water mark of any water body, unless otherwise approved by the Board in writing.

BIMC may, for the purpose of geotechnical or exploration investigations carry out drilling activities within thirty-one (31) metres of the high water mark of any water body or on ice, provided that such activities are consistent with the terms of this Licence and a request has been submitted and received by the NWB, ten (10) days in advance of drilling, that includes a thorough description of the proposed activities and the following:

- An appropriate scaled site map, complete with approximate GPS coordinates of planned drilling locations and the associated water bodies;
- o Locations of waste deposition; and,
- Mitigation measures that are planned to be in place, prior to, during drilling and following if required to protect waters.

BIMC will dispose of all drill waste, including water, chips, muds and salts (CaCl<sub>2</sub>), from land-based drilling, in a properly constructed sump or an appropriate natural depression located at a distance of at least thirty one (31) metres from the ordinary high water mark of any adjacent water body, where direct flow into a water body is not possible and no additional impacts are created.

Drilling additives or mud shall not be used in connection with holes drilled through lake ice unless they are demonstrated to be non-toxic.

If artesian flow is encountered, drill holes shall be immediately sealed and permanently capped to prevent induced contamination of groundwater or salinization of surface waters. BIMC will report all artesian flow occurrences within the Annual Report to NWB, including the location (GPS coordinates) and dates.



If the bottom of the permanently frozen ground, or permafrost, is broken through by the drill, the depth of the bottom of permafrost and location should be reported in the annual report to the Board for data management purposes.

For "on-ice" drilling where drill additives are being used, return water released must be non-toxic, and not result in an increase in total suspended solids in the immediate receiving waters above the Canadian Council of Ministers of the Environment, 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).

### 11.0 Spill Contingency Planning

BIMC has submitted to the Board an Emergency Response and Spill Contingency Plan for the Mary River project. This Plan has been approved by the Board and is updated on an annual basis. For the purpose of emergency response and spill contingency planning, all provisions outlined in the Emergency Response and Spill Contingency Plan approved under Type A Licence 2AM-MRY1325 will be applicable for activities regulated by the renewed Type B Licence. BIMC proposes to prepare an addendum to its Emergency Response and Spill Contingency to specifically address emergency and spill scenarios associated with the exploration activities within the scope of the renewed Licence following issuance of the renewed licence.

In addition to the addendum to the Mary River Project Emergency Response and Spill Contingency Plan, the following conditions will apply for spill contingency planning:

- BIMC will prevent any chemicals, petroleum products or wastes associated with the project from entering water. All sumps and fuel caches shall be located at a distance of at least thirty one (31) metres from the ordinary high water mark of any adjacent water body and inspected on a regular basis.
- BIMC will ensure that any chemicals, petroleum products or wastes associated with the project do not enter water. All sumps and fuel caches shall be located at a distance of at least thirty one (31) metres from the ordinary high water mark of any adjacent water body and inspected on a regular basis.
- BIMC will ensure that any equipment maintenance and servicing be conducted only in designated areas and shall implement special procedures (such as the use of drip pans) to manage motor fluids and other waste and contain potential spills.
- If during the term of this Licence, an unauthorized discharge of waste occurs, or if such a discharge is foreseeable, BIMC will:
  - Employ the approved Spill Contingency Plan;
  - Report the spill immediately to the 24-Hour Spill Line at (867) 920-8130 and to the Inspector at (867) 975-4295; and
  - For each spill occurrence, submit to the Inspector, no later than thirty (30) days after initially reporting the event, a detailed report that will include the amount and type of spilled product, the GPS location of the spill, and the measures taken to contain and clean up the spill site.



# 12.0 Security

BIMC confirms that at this time for the ongoing activities planned that \$1,250,000 will remain under the renewed licence as reclamation security for relevant activities and/or facilities. To the extent that the establishment of any satellite camp has an impact on reclamation security, BIMC would post the additional security required prior to proceeding with the activity.