

4ペリヘルプ

Avatiligiyiit

Department of Environment

Ministère de l'Environnement

Feb. 16, 06

Richard Dwyer Licensing Trainee Nunavut Water Board

via Email to: licensingtrainee@nwb.nunavut.ca

RE: 2BE-NAD – DEWAR LAKES EXPLORATORY DRILLING WATER LICENSE RENEWAL APPLICATION

Dear Richard:

The Department of Environment (DOE) has reviewed the water license renewal application from Commander Resources Ltd. for conducting a gold and base metal exploratory drilling near Dewar Lakes, 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:

- The name, job title and 24 hour telephone number for the person responsible for activating the spill plan is required.
- The site description submitted is insufficient and should include information such as location, size and storage capacity. In addition, a site map should be included and be large enough to include site location, nearby buildings/facilities, roads, culverts, drainage patterns, and nearby bodies of water.
- 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.
- A spill report form should be included within the plan. In addition, a Waste Manifest must accompany all movements of hazardous wastes, and all parties must register with the Environmental Protection Service, DOE.

PH: (867) 975-7733

FX: (867) 975-7739

• Besides a briefing of the spill plan to employees, a sound training exercise in response to spills should be provided to spill response workers.

2. ABANDONMENT & RESTORATION PLAN

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

- The site description submitted is insufficient, and it should include a brief site history, site location (coordinates), number of workers, type of exploration, and approximate area being disturbed.
- 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.
- For camps of more than 10 people, it is recommended that a forced air incinerator be used to manage wastes. In addition, garbage should be removed from camps periodically.

3. WILDLIFE

The project site situates at the edge of Dewar Calving Area, a Critical Wildlife Area, and there will be potential caribou calving activities near the site. The DOE recommends that the proponent follow instructions below if calving activities are observed.

The period between May 15 and July 15 is the normal caribou calving season. The applicant is advised to suspend all operations, particularly blasting, overflights by aircraft at any altitude of less than 300 meters above ground level, and the use of snowmobiles and ATV's (all-terrain vehicles) outside the immediate vicinity of the camp. In addition, all personnel should remain quietly in the camp when caribou are in the area.

We thank NWB for giving us the opportunity to review and provide comments on the Commander's water license renewal application near Dewar Lakes. Please contact me if you have any further questions or comments.

Yours sincerely,

Original signed by

Helen Yeh
Environmental Assessment Coordinator



Environmental Protection Service Department of Environment Government of Nunavut P.O. Box 1000, Stn. 1360 Iqaluit, Nu X0A 0H0

PH: (867) 975-7733 FX: (867) 975-7739 EM: hyeh@gov.nu.ca

