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December 5th, 2007

Phyllis Beaulieu
Manager of Licensing
Nunavut Water Board
P.O. Box 119
Gjoa Haven, NU, X0B 1J0

Tel: (867)360-6338 Fax: (867)360-6369

via email

RE: Prince of Wales Project, Devon Island Project, Chartrand Lake Project, 2BE-PCD0607, Renewal Application

Dear Ms. Beaulieu,

The Department of Lands and Resources within the Qikiqtani Inuit Association (QIA) has reviewed the water licence application for the Prince of Wales Project, Devon Island Project, Chartrand Lake Project. In reviewing this application, QIA has made reference to all documents contained in the 2BE-PCD0607 file on the Nunavut Water Board's (NWB) FTP-site.

Water Licence Application Form

Section 4, Description of Undertaking, suggests garbage and disposable waste materials will be regularly transported to the closest authorized community landfill. QIA requests the applicant provide the NWB with a copy of the letter of authorization from each Hamlet approving waste disposal in their community. QIA requests that all wastes are disposed of in facilities licenced by the NWB.

Section 8, Waste, lists the expected wastes associated with this project. QIA requests that all camp locations, sewage and grey water disposal areas are recorded using GPS and photographed prior to vacating the site. QIA requests this information is provided to the NWB as part of the annual report requirements.

Appendix to Nunavut Water Board Application Form

The appendix should be amended to state activity will not occur on P41 and not P14. This appears to be an inversion error.

Section 10, Environmental Impacts and Mitigation Measures, states "we consider these local assistants to be the eyes and ears of the each community on our activities". The proponent should understand that all community members impacted by the project activities will have the opportunity to voice their concerns. A field assistant from a Nunavut community will certainly have firsthand experience in interpreting project impacts; however the role of this employee should not trump the experience and opinions of other community members.

Section 39, Baseline Data, Wildlife authorities should include community Hunters and Trappers Associations.

Exploration/Remote Camp Supplementary Questionnaire

QIA notes that camp locations have not been determined with the assistance of the QIA Lands and Resources. QIA should be consulted before camp operations commence. In consulting with QIA the proponent should understand QIA will include communities in proximity of the planned project in the discussion.

OP018 – Abandonment of Exploration Activity

QIA requests the NWB require and Abandonment and Restoration Plan (A+R Plan) as a condition of the water licence. The A+R Plan should be tailored to the project applied for. It appears OP018 and RCD 070 are general in nature. Furthermore, QIA request before-and-after records (including photographs and GPS coordinates) of all project activities are submitted for reviewers.

RCD 064 – Spill Contingency Plan

QIA should be added to the list of initial contacts following a spill event. Furthermore, QIA should be copied on all follow-up communication and reports filed by the proponent. The QIA representative for spill events is Salamonie Shoo, Lands Administrator, telephone 867-975-8422, fax 867-979-1643 and email landadmin@gia.ca.

Please do not hesitate to contact our Environmental Technician with any questions or comments with regards to the foregoing at (867) 975-8419 or by email at envirotech@qia.ca.

Yours Truly,

John Amagoalik

Director of Lands and Resources