



Environment Canada Environnement Canada

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Via Email

RE: 2BE-RBP – Roche Bay PLC – Submission of an Abandonment & Restoration Plan and Revised Spill Plan for the Roche Bay Magnetite Project

On behalf of Environment Canada (EC), I have reviewed the above mentioned application. The following specialist advice has been provided pursuant to Environment Canada's mandated responsibilities for the enforcement of the *Canadian Environmental Protection Act*, Section 36(3) of the *Fisheries Act*, the *Migratory Birds Convention Act*, and the *Species at Risk Act*.

Environment Canada is appreciative of Roche Bay PLC's efforts to have an Abandonment & Restoration (A&R) Plan and a Spill Contingency Plans specific to its Roche Bay Magnetite Project. Recommendations regarding the content of these plans are noted below.

ABANDONMENT AND RESTORATION PLAN

- EC requests that the proponent clearly communicate how it intends to dispose of its drilling wastes, i.e., drill water, drill cuttings, and sludge, when abandoning drill sites. The project's seasonal A&R procedures indicate that all sumps used to support drilling operations will be backfilled once drill cores have been removed and that all waste will be collected and taken to camp for incineration or removal to an approved disposal location. EC suggests that the proponent make known what types of drilling wastes will be directed to sumps. Environment Canada recommends that drilling wastes either be disposed of in sumps such that their contents cannot enter any water body or



be removed from the project area for proper disposal. All sumps shall be located above the high water mark of any water body and be backfilled upon completion of the field season.

SPILL CONTINGENCY PLAN

- All fuel caches shall be located above the high water mark of any water body. Further EC, recommends the use of secondary containment, such as self-supporting insta-berms, when storing barreled fuel on location rather than relying on natural depressions.

GENERAL COMMENTS

- EC appreciates the proponent's recent information submission concerning the use of a natural pond for the disposal of domestic gray water. The proponent is reminded that its project activities must respect Section 36(3) of the *Fisheries Act*, where the deposition of deleterious substances of any type in water frequented by fish, or in any place under any conditions where the deleterious substance that results from the deposit of the deleterious substance, may enter any such water, is prohibited. The proponent is strongly encouraged to conduct a thorough assessment of the potential gray water disposal pond to determine whether it qualifies as fish habitat and will prevent the release of gray water into nearby water bodies (i.e., that there is a sufficient free-board). EC requests that the proponent direct its gray water to a suitable natural depression or man-made sump until it can determine that the use of a natural pond is acceptable. It is requested that the proponent submit its assessment findings to both the Nunavut Water Board and EC for review.
- EC encourages the proponent to consider the use of a man-made sump for the disposal of gray water. The responsible use of such sumps will ensure that fresh water sources frequented by fish are not damaged from project activities.
- It is recommended that the proponent consult with Transportation Canada regarding access to the project area by marine vessels, especially if it intends to access its project area outside of the normal arctic waters shipping season.

If there are any changes in the proposed project, EC should be notified, as further review may be necessary. Please do not hesitate to contact me if you have any questions or comments with regards to the foregoing at (867) 975-4631 or by email via david.abernethy@ec.gc.ca.



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Sincerely,

David W. Abernethy
Environmental Assessment Technician

cc. Colette Spagnuolo – Environmental Assessment / Contaminated Sites Specialist,
Environment Canada, Iqaluit