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Our file: 4703 001 July 5, 2004

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## RE: NIRB 04EN079 / NWB2REG - Strongbow Resources Inc. - Regan Lake Project

On behalf of Environment Canada (EC), I have reviewed the information submitted with 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.

Strongbow Resources Inc. is proposing to conduct a mineral exploration program in the Regan Lake area, including mapping, prospecting, ground truthing, and exploratory diamond drilling. The exploration area is located 40 km south of the Hackett River base metal deposit and the Goose Lake gold deposits. A temporary field camp for 14-16 people will be established at a location yet to be determined.

Environment Canada requires the following information in order to facilitate the review of this application:

- The application states that the proposed work is to begin on July 1, 2004. Environment Canada would like to remind the proponent that all required permits and approvals must be in place prior to the start of any work.
- Once available, a map indicating the location of all drill holes, especially in relation to
- A map indicating the location of the field camp.

Environment Canada recommends that the following conditions be applied throughout all stages of the project:

The proponent shall not deposit, nor permit the deposit of any fuel, drill cuttings, chemicals, wastes or sediment into any water body. According to the Fisheries Act, Section 36(3), the deposition of deleterious substances of any type in water frequented



by fish, or in any place under any conditions where the deleterious substance, or any other deleterious substance that results from the deposit of the deleterious substance, may enter any such water, is prohibited.

- For "on-ice" drilling, 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 for the Environment Guidelines for the Protection of
  Freshwater Aquatic Life (i.e. 10mg/L for lakes with background levels under 100 mg/L, or
  10% for those above 100mg/L).
- Land based drilling should not occur within 30 m of the high water mark of any water body. Drilling wastes from land based drilling shall be disposed of in a sump such that the contents do not enter any water body.
- Drilling additives or muds shall not be used in connection with holes drilled through lake ice unless they are re-circulated or contained such that they do not enter the water, or demonstrated to be non-toxic.
- Environment Canada would like to inform the proponent that the *Canadian Environmental Protection Act* has recently listed CaCl as a toxic substance. The proponent shall therefore ensure that all sumps containing CaCl are properly constructed and located in such a manner as to ensure that the contents will not enter any water body.
- If an artesian flow is encountered, the drill hole shall be immediately plugged and permanently sealed.
- The proponent shall not store materials on the surface ice of lakes or streams, except that which is for immediate use.
- All sumps, including those for drill wastes, camp sewage, and greywater shall be located above the high water mark of any water body and in such a manner as to prevent the contents from entering any water body frequented by fish. Further, all sumps shall be backfilled and contoured to match the surrounding landscape at the end of each field season.
- Environment Canada recommends the use of an approved incinerator for the disposal of combustible camp wastes. The proponent shall ensure that all hazardous materials, including waste oil, receive proper treatment and disposal at an approved facility.
- Species at risk, as defined by the *Species at Risk Act*, may be encountered in this area. The proponent shall make themselves aware of these species, and while conducting their operations, the proponent should be aware of this special status and minimize disturbance or contact with these species. Species at risk which may be encountered in the Regan Lake area include, but are not limited to, wolverine, grizzly bear, tundra peregrine falcon, and short-eared owls, listed as species of Special Concern under Schedule 3 of the *Species at Risk Act*.
- All fuel caches shall be located above the high water mark of any water body and in such a manner as to prevent the contents from entering any water body frequented by fish. Further, when storing barreled fuel on location, EC recommends the use of secondary containment, such as self-supporting insta-berms.
- The 2004 Spill Response Plan included with the water license application indicates that Environment Canada personnel should be contacted in the event of a spill. The contact number for this notification should be changed to (867) 975-4644.
- Environment Canada recommends the use of drip pans, or other similar preventative measure, when refueling equipment on site.
- All spills are to be documented and reported to the 24 hour Spill Line at (867) 920-8130.

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 with any questions or comments with regards to the foregoing at (867) 975-4639 or by email at colette.meloche@ec.gc.ca.



Yours truly,

## Original signed by

Colette Meloche Environmental Assessment / Contaminated Sites Specialist

cc: (Paula Pacholek, Northern Environmental Assessment Coordinator, Environment Canada, Yellowknife)

