

Affaires indiennes et du Nord Canada www.ainc.gc.ca

Nunavut Regional Office P.O. Box 100 Iqaluit, NU, X0A 0H0

Your file - Votre référence 2007N-2BE-SIL Our file - Notre référence 9545-1-2STRG / CIDMS# 139657

April 20th, 2007

Phyllis Beaulieu Licensing Administrator Nunavut Water Board P.O. Box 119 Gjoa Haven, NU, X0A 1J0

Re: Licence Application- Silvertip Project-Strongbow Exploration Inc.- 2007N-2BE-SIL

The Nunavut Region of Indian and Northern Affairs Canada (INAC) has reviewed the amendment application submitted by Strongbow Exploration Inc. In reviewing this file, all documents posted on the Nunavut Water Board (NWB) ftp site associated with this application have been considered.

## DRILLING OPERATIONS

Sections 19 and 20 of the Exploration / Remote Camp Supplementary Questionnaire mentions the use of sumps. Though the abandonment and restoration plan offers more detail, INAC would like to remind the proponent that for all drilling operations on ice, the proponent should ensure that all drill cuttings are placed in drill holes, sumps, or removed from the project area for appropriate treatment. All sumps shall be backfilled and contoured to prevent precipitation run-off collection prior to the end of the project's field season.

## SPILL CONTINGENCY / HAZARDOUS MATERIALS

Section 24 of the Exploration / Remote Camp Supplementary Questionnaire states "A spill kit will be located at the fuel storage are in camp, and spare kits will be on hand in the camp". INAC requests the proponent locate a spill kit wherever fuel is stored, including temporary fuel storage sites such as drill hole locations.

Section 25 of the Exploration / Remote Camp Supplementary Questionnaire mentions fuel storage. It is recommended that some form of secondary containment, such as self-supporting insta-berms, be used when storing barrelled fuel on-site. Also, spill trays should be used when conducting fuel transfers to minimize the possibility of polluting freshwater with spilled hydrocarbons. The proponent shall ensure that all hazardous materials, including waste oil, receive proper treatment and disposal at an approved facility.



Section 5.2 of the Spill Contingency Plan states "contain the spill or environmental hazard, as per its nature, and as per the advice of the Spill Line and the DIAND Water Resource Officer as required." Although INAC may provided such advice (i.e. in an emergency situation) it is not the role of INAC or other regulators to act as a routine spill advisor.

Finally, given the information provided by the proponent in this application, INAC recommends the length of water licence 2BE-SIL not exceed two years. Should the proponent wish to extend their activites beyond two years of operation they may do so through filing a licence extension to 2BE-SIL with the Nunavut Water Board.

Should you have any questions or comments, please do not hesitate to contact me at (867) 975-4548 or by email at BathoryS@ainc-ianc.gc.ca.

Sincerely,

Original Signed By

Stephen Bathory Regional Coordinator