

Water Resources Nunavut Regional Office P.O. Box 100 Igaluit, NU, X0A 0H0

August 4, 2011

Phyllis Beaulieu Manager of Licensing Nunavut Water Board P.O. Box 119 Gjoa Haven, NU, X0A 1J0 Your file - Votre référence 2BE-SIP----Our file - Notre référence CIDM# 473928

RECEIVED

2BE-SIP---- New Water License Application – Southampton Island Project – Vale Exploration Canada Inc. – Kivalliq Region

Aboriginal Affairs and Northern Development Canada (AANDC) has performed a review of the new water license application, 2BE-SIP---- (Southampton Island Project), submitted by Vale Exploration Canada Inc. to the Nunavut Water Board (NWB). The following advice has been provided pursuant to AANDC's mandated responsibilities for the enforcement of the Nunavut Waters and Nunavut Surface Rights Tribunal Act (NW&NSRT Act) and the Department of Indian Affairs and Northern Development Act (DIAND Act). In conducting our review, AANDC referred to the documents on the NWB's FTP-site under 2BE-SIP----.

Should you have any questions or comments, please do not hesitate to contact me at (867) 975-4568 or by email at Eva.Paul@aandc-aadnc.gc.ca

Sincerely,

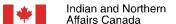
Original Signed By

Eva Paul

Water Resources Technician, Aboriginal Affairs and Northern Development Canada, Nunavut Regional Office

Cc. David Abernethy, A/Manager, Water Resources, Aboriginal Affairs and Northern Development Canada, Nunavut Regional Office Bernie MacIsaac, A/Manager of Field Operations, Aboriginal Affairs and Northern Development Canada, Nunavut Regional Office





Technical Review Memorandum

To: Phyllis Beaulieu – Manager of Licensing, Nunavut Water Board

From: Eva Paul – Water Resources Technician, Aboriginal Affairs and Northern Development Canada, Nunavut Regional Office

Re: 2BE-SIP---- New Water License Application – Southampton Island Project – Vale Exploration Canada Inc. – Kivalliq Region

Project Description

On July 15, 2011 the Nunavut Water Board (the Board) distributed Vale Exploration Canada Inc.'s (Vale) application for a Type B water licence to allow for the use of water and disposal of waste associated with the Southampton Island Project. Vale has requested a licence term of three years.

Vale's proposed project will consist of preliminary exploration activities on Southampton Island, approximately 65 km northeast of the Hamlet of Coral Harbour. 2011 activities include aerial surveys and the assessment of possible drilling locations. Drilling would start in the fall of 2011. Drilling locations will be dependent on the results of the summer survey. Vale does not propose to set up a camp in 2011; rather they will fly crews from Coral Harbour daily by helicopter. Vale may set up a camp on-site in 2012.

Once drilling is begun, Vale proposes to use 15m³ of water per day for drilling activities, and 1m³ of water per day for camp purposes.

Results of Review

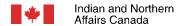
AANDC Water Resources Division offers the following comments for the Board's consideration.

General:

Vale's application is very comprehensive; however, the preliminary nature of the project results in a lack of detail. This makes it difficult to assess whether the requested water usage is appropriate to the scale of the project. AANDC would appreciate clarification of the following:

The approximate dates and person-numbers of camp occupancy for 2012





onwards.

- The camp description.
- The number of drills to be in operation along with their respective water-use requirements.

Waste Management

AANDC recommends that Vale provide written confirmation from the Hamlet of Coral Harbour that they will accept non-hazardous solid waste materials, and waste oil generated by project activities.

Section 15 of the submitted July 4, 2011 Application and Questionnaire states that contaminated soil and/ or water may be treated at the Hamlet of Coral Harbour's landfill (depending on the level of contamination). AANDC recommends that there be no disposal of contaminated soil or water generated by this project's activities in Nunavut municipalities. Rather, these waste materials should be shipped south for disposal at an approved facility.

The AANDC Water Resources Division recommends that any burning of waste materials be carried out in accordance with Environment Canada's, "Technical Document for Batch Waste Incineration." This document provides information on appropriate incineration technologies, best management and operational practices, monitoring, and reporting. Ash residue from incineration activities should be disposed in an approved waste disposal facility.

Spill Contingency Plan:

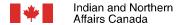
Section 1.5 of the Spill Contingency Plan describes the presence of hazardous materials on-site, including lubricants, oil, and grease for the maintenance of the drill. No mention was made of storage of these materials. AANDC would recommend that Vale describe how these materials will be appropriately stored on-site.

Spill Reporting under section 2.2.2 should also include the Manager of Field Operations, AANDC who can be contacted by telephone at 867-975-4295 and by fax at 867-975-6445.

In section 2.2.5 describing Spills on Water, Vale specifically describes cleanup of potential spills on slow-moving or calm water, and explicitly excludes fast-moving or turbulent water. Given the drilling locations are not yet selected, AANDC would like clarification on how Vale proposes to address the latter possibility.

AANDC recommends that the Spill Plan also be updated prior to the field season to include the following:





- a. An onsite contact number, and
- b. Fuel cache and hazardous material storage locations.

Aside from the above comments, AANDC feels that the application and plans that were submitted are generally appropriate for the scale and scope of the project, and that standard terms of licence will adequately address this application.

Cc. David Abernethy, A/Manager, Water Resources, Aboriginal Affairs and Northern Development Canada, Nunavut Regional Office Bernie MacIsaac, A/Manager of Field Operations, Aboriginal Affairs and Northern Development Canada, Nunavut Regional Office

