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NUNAVUT WATER BOARD
NUNAVUT IMALIRIYIN KATIMAYINGI

March 13, 2002

File No: NWB2TAK0002 (amendment)

Attn: Diane Gregory
Land and Contracts Manager
Kennecott Canada Exploration Inc.
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Tel: 604-669-1880
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Email: diane.gregory@kennecott.com

Re: Request for Response - Application for Amendment

Dear Ms. Gregory,

The Nunavut Water Board (NWB) has received comments from interest parties and the Nunavut Impact Review Board (NIRB) screening decision on your application to amend license NWB2TAK0002 for the Rocking Horse/Takajuak Project. A copy of the NIRB screening decision and all submissions from interested parties are available through the internet on our ftp site at <ftp://ftp.nwb.yk.com> in the folder "NWB2TAK0002." Before making a decision, the NWB would like to give you the opportunity to provide a response to the comments or concerns expressed by interested parties. In particular, the NWB is seeking your views on the following:

1) Proposed Road – Kennecott proposes to construct an all weather road between the camp and the dock area, and drill site near the shore of Napaktulik Lake. Please provide the layout of the proposed camp layout, as well as the corridor of the projected route. Identify all water course crossings, and the possible effects on natural drainage. Will access to drill sites be exclusively by ice or winter roads?

In their submission, the Government of Nunavut (GN) points out that the footprint for this type of project is significantly increased, as is the potential for fuel spills with the construction/use of roads. GN suggests that the fuel re-supply at drill sites be done via helicopter lift or overland hauling using snowmobile and sleds. Please comment on these proposed measures.

2) Sewage Treatment – In the Appendix to the application, a biological digester is proposed, whereas the supplementary questionnaire indicates that a sump will be used. Please clarify your intentions. If a biological digester is proposed, will it produce sludge and in the affirmative, how will they be treated and disposed of (i.e., off site, incineration, on land disposal, sump, etc)?

3) Greywater Disposal – Your project proposes to discharge greywater to a sump (2m x 2m x .6m). It appears that based on the average number of persons in the camp (50), at an estimated water use of 100L/p/d, that this may not be an adequate treatment option. Have alternatives for the disposal of greywater be explored? Please also discuss specifically DIAND's recommendation to monitor BOD and TSS down gradient from the sump.

4) Fuel Storage – Concerns were expressed by KIA, DIAND, and EC. DIAND recommended that the licence include a requirement that GPS coordinates of all spills be included in the spill report, and that the design of the bulk fuel storage site should include elements that would prevent or contain spillage

from fuel drums. They point out that storing fuel drums on grass will impede the early detection of leaks, and suggests that the risk to the environment could be reduced by storing the barrels in a smaller area, on a flat storage pad. Environment Canada encourages proponents to use a secondary containment rather than relying on a natural depression; they note that self-supporting insta-berms are available from various suppliers within Canada. KIA also notes that Kennecott will import a substantial amount of fuel (up to 400 barrels Jet B, up to 400 barrels diesel, 100 propane cylinders, and 25 (205L) gasoline drums) to be stored in a natural depression, and recommends that fuel be stored on a pad with a berm (tank farm) or bring in large self-bermed tanks.

5) Solid Waste Disposal - Please confirm the frequency proposed for use of the incinerator for waste reduction of combustible solid waste. Will there be a need for solid waste to be stockpiled? If so, what mitigation measures are proposed for minimized wind blown debris? Will leachate be a concern and if so, how do you propose to monitor it?

6) Minimum 30 m threshold for drilling – NIRB screening decision (point number 1) does not allow drilling within 30 metres from a watercourse. Therefore, your request for NWB approval to drill within this zone cannot be approved. How does this affect the delineation drilling program? DIAND recommends that Kennecott be required to submit annually a plan to the NWB outlining the proposed drilling locations and site-specific conditions at drilling sites that would be closer than 30 metres from a watercourse. DIAND suggests that it may be best to evaluate the drill sites on a case-by-case basis rather than granting blanket approval for this type of activity. DIAND also indicates concern with potential impacts of drilling to fish habitat. Please discuss these recommendations in light of NIRB's screening decision.

Your timely reply in this matter will expedite the final approval from the NWB. If you have any questions do not hesitate to contact me.

Sincerely,

Original signed by:

Dionne Filiatrault, P. Eng.,
Technical Advisor

Available: NIRB Screening Decision (includes KIA and GN submissions)
Submissions from DIAND, EC, DFO

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