

Water Resources Division Nunavut Regional Office Igaluit, NU X0A 0H0

August 1, 2007

Richard Dwyer Licensing Trainee **Nunavut Water Board** Gjoa Haven, NU X0B 1J0

Re: 2BE-WAL / Golden Bull Resources Ltd. / Walker Lake Project / Kitikmeot **Region / Renewal Application**

Our File: 9545-2 / CIDMS 159230

Your File: 2BE-WAL

On behalf of Indian and Northern Affairs Canada (INAC), I have reviewed the above mentioned application. The following advice has been provided pursuant to INAC's mandated responsibilities for the enforcement of the Nunavut Waters and Nunavut Surface Rights Tribunal Act (NW&NSRT) and the Department of Indian Affairs and Northern Development Act (DIAND Act).

Golden Bull Resources Ltd. (GBRL) is applying for a renewal of the Walker Lake Project licence, 2BE-WAL0607. The Walker Lake Project is situated on Crown lands within Nunavut's Kitikmeot region, having a general coordinates of 66°47'59" north latitude, 90°42'46" west longitude. Golden Bull Resources Ltd. conducted an exploration program within the Walker Lake Project area in the summer of 2004. This program comprised of sampling, prospecting, mapping, and ground geophysics activities. No exploration activities are planned for 2007. However, an exploration program is planned for 2008 and/or which will include a diamond drilling exercise. A temporary work camp will be established on an island within the northern portion of Walker Lake capable of accommodating 20 people. This location is amenable for the landing of small aircraft due to the presence of an esker and was used to establish a camp during GBRL's 2004 exploration season.

Indian and Northern Affairs Canada recommends that the following comments be considered when reviewing this licence application:

- Golden Bull Resources Ltd. wants to renew the Golden River Resources Corporation water licence that expired on June 30, 2007, under the company's present name. Furthermore, GBRL has requested that this licence be renewed under the miscellaneous classification for primary undertakings when the expired licence had a mining and milling classification.
 - Golden Bull Resources Ltd. should notify the NWB if it has taken control of Golden River Resources Corporation's rights to the Walker Lake Project.



- Should the NWB decide to renew the expired 2BE-WAL0607 licence, the classification of primary undertakings should not change.
- Section 14 of the Water Licence Application Form specifies which documents must be included with a licence application to start the regulatory process.
 Golden Bay Resources Ltd. has not included the following documents which are considered to be necessary based on the submitted application:
 - Inuktitut and/or Inuinnagtun summary of the project; and,
 - An application fee of \$30.00 (payee Receiver General of Canada)
- The proponent should not be granted a one (1) year licence for a project that will
 continue to operate in the immediate future. Rather, a five (5) year licence should
 be issued. The NWB and stakeholders in the licensing process (i.e., INAC)
 should not review licence renewal applications for the same project on an annual
 basis.
- The proponent should note that Section 10 of the Water Licence Application
 Form does not state that a Nunavut Impact Review Board (NIRB) screening for
 the Walker Lake Project was conducted in 2004. The NIRB screening number is
 04EN050.
- Combustible wastes produced during project operations should either be incinerated in an approved incinerator or delivered to an approved waste treatment facility. In addition, ashes and any remaining residue generated throughout the course of project operations are to be delivered to an approved waste treatment facility. This condition is provided in Part D, Item 6 of the expired 2BE-WAL licence. Item 33 of the Supplementary Questionnaire states that burnable waste will be incinerated in a 205 litre burn barrel or a CSA environmentally-incinerator. The proponent should note that open burning of wastes is not an effective means of incineration and not permitted under Part D, Item 2 of the expired 2BE-WAL0607 licence.
- The Walker Lake Spill Contingency Plan should be revised to include the following information:
 - The name, job title, and 24-hour telephone contact number(s) for persons responsible for activating the Spill Contingency Plan. This ensures that the employee who discovers a spill, should this occur, can activate a response and provides contact information for authorities investigating the spill;
 - Method(s) of storing fuel products. Indian and Northern Affairs Canada recommends that some form of secondary containment be utilized at all fuel caches to prevent the possibility of contaminating freshwater resources with spilled hydrocarbon products;
 - Confirmation that the Government of Nunavut's Environmental Protection Act Consolidation of Spill Contingency Planning and Reporting Regulations (R-068-93) are being adhered to. The Spill Contingency Plan currently states

that fuel spills greater than 200 litres will be reported. The proponent should consult the above-mentioned regulations to determine when it is required to report fuel spills to the Nunavut 24-hour spill report line;

- A copy of the Nunavut 24-hour spill report form. This form is available on the NWB public registry;
- All applicable material safety data sheets;
- Response measures for spills on water;
- Schematic diagrams of the camp and any fuel caches within the Walker Lake Project area. These diagrams should be set at an appropriate scale and include base contour lines, nearby freshwater resources (i.e., lakes, ponds, rivers, and streams), project infrastructure, and spill response kit storage locations:
- A description of the training provided to employees in fuel spill response procedures; and,
- A list of emergency contacts for reporting fuel spills. This list should include Peter Kusugak, INAC Nunavut Regional Office Manager of Field Operations. Peter can be reached by office telephone at (867) 975-4295 or by facsimile at (967) 979-6445. This contact should be used rather than the Water Resources Inspector presently provided in the Spill Contingency Plan.
- The Walker Lake Abandonment and Reclamation Plan should be revised to include the following information:
 - Seasonal closure procedures;
 - Temporary shutdown procedures;
 - Final closure procedures; and,
 - Detailed information pertaining to the reclamation of drill sites and the camp area.

Indian and Northern Affairs Canada requests notification of any changes in the proposed project, as further review may be necessary. Please contact me should you have any questions or comments with regards to the foregoing. I can be reached by telephone at (867) 975-4555 or by email at abernethyd@inac-ainc.gc.ca.

Regards,

Original signed by

David W. Abernethy Water Resources Coordinator

Cc. Jim Rogers, Manager of Water Resources – Indian and Northern Affairs Canada, Nunavut Regional Office

Peter Kusugak, Manager of Field Operations – Indian and Northern Affairs Canada, Nunavut Regional Office

Andrew Keim, Water Resources Officer - Indian and Northern Affairs Canada, Nunavut Regional Office