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Department of Environment

Ministère de l'Environnement

Nunavut Water Board MAY 1 3 2005 Public Registry

> NWB File: NWB2WLS0406

via Email to: licensing@nwb.nunavut.ca

Mrs. Phyllis Beaulieu Manager of Licensing Nunavut Water Board P.O. Box 119 Gjoa Haven, NU X0E 1J0

Dear Mrs. Beaulieu:

Re: SPILL CONTINGENCY AND ABANDONMENT & RESTORATION PLAN WALES ISLAND PROJECT

The Department of Environment (DOE), Government of Nunavut has reviewed the Spill Contingency and Abandonment & Restoration Plans for the Wales Island Project, Strongbow Exploration Inc., Nunavut". These reports were submitted to the NWB under Strongbow Exploration Inc. current water license, amendment "Type B".

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Both the Spill Contingency Plan (SCP) and the Abandonment and Restoration Plan (A&R) are stand alone documents that should include a brief introduction or description of the area, and a site map. These two components are very important to the reviewer if unfamiliar with the project area or site.

Comments/Recommendations:

Spill Contingency Plan

- Strongbow Exploration should provide a description of the facility including the location (UTM or GPS Coordinates), size, and storage capacity. This is important if persons are unfamiliar with the facility or area.
- 2) The proponent mentions an on-site spill kit containing a 20 L Poly containment pail. Spill kits should be located where ever fuel is stored and should be large enough to hold a 205 L fuel spill in the event that a drum is tipped over or punctured.
- 3) MSDS for all fuels and chemicals stored on site should be placed in a central location for easy access in the event of a spill.
- A list of emergency contact names and numbers should be included in the SCP (i.e. hospital, fire, police, and clean-up specialist).
- 5) The proponent may want to include the NWT/Nunavut Spill Report form in the SCP as well.

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Abandonment & Restoration Plan

- 1) Strongbow Exploration should provide an introduction and brief history of the site. They may want to include: previous exploration, project description and description of the area, and the type of exploration.
- 2) The proponent should provide the locations of different facilities on site especially fuel storage facilities and chemical storage, and the location of spill kits. This would aid in the clean up of areas where soil contamination from petroleum products may have occurred.
- 3) It is important to provide accurate amounts of materials (fuels, chemicals etc.) stored on site for the safety of the workers, and it would allow the company to accurately determine the amount of material lost in the event of a spill.
- 4) All fuels, chemicals, structures and equipment should be disposed off or removed from site at the end of the project.
- 5) Drill holes and sumps should be capped and backfilled, also any other disturbed area should be re-contoured and remedied back as close as possible prior to the start of the project.
- 6) Soil samples and pictures should be taken before and after the abandonment and restoration of the area. This would allow the agencies to see the progress and efforts made, to clean up the area as much as possible to its original state.

We thank the NWB for giving us the opportunity to review the spill contingency and abandonment and restoration plans for Wales Island Project, Strongbow Exploration. Please contact me if you have any further questions or comments.

Sincerely,

Original signed by

Ian Rumbolt Coordinator, Environmental Assessment **Environmental Protection** Department of Environment Government of Nunavut Box 1000, Stn. 1360 Igaluit, NU, X0A 0H0 Phone: (867) 975-5924

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