



Water Resources Division  
Resource Management Directorate  
Nunavut Regional Office  
P.O. Box 100  
Iqaluit, NU, X0A 0H0

Your file - Votre référence  
2BE-WOL----  
Our file - Notre référence  
CIDM#1553666

June 13, 2018

Ida Porter  
Licence Administrator  
Nunavut Water Board  
P.O. Box 119  
Gjoa Haven, NU, X0B 1J0  
E-mail: [licensing@nwb-oen.ca](mailto:licensing@nwb-oen.ca)

**Re: Crown-Indigenous Relations and Northern Affairs Canada Comments on New Type B Water Licence Application by Rio Algom Exploration Inc. (BHP) for the Wolverine Project, Water Licence No. 2BE-WOL----.**

Dear Ms. Porter,

Thank you for your May 13, 2019 invitation to comment on the application from Rio Algom (BHP) for a new exploration water licence on Victoria Island in the Kitikmeot Region of Nunavut.

CIRNAC examined the submission. Comments in Attachment A have been provided pursuant to CIRNAC's mandated responsibilities under the *Nunavut Waters and Nunavut Surface Rights Tribunal Act* and the *Department of Indian Affairs and Northern Development Act*.

If there are any questions or concerns, please contact me at (867) 975-4282 or [bridget.campbell@canada.ca](mailto:bridget.campbell@canada.ca).

Sincerely,

Bridget Campbell,  
Water Resources Coordinator



## **Attachment A: Review Comments**

To: Ida Porter, Licence Administrator, Nunavut Water Board

From: Bridget Campbell, Water Resource Coordinator, Water Resources Division,  
CIRNAC

Date: June 13, 2019

**Re: Crown-Indigenous Relations and Northern Affairs Canada Comments on New Type B Water Licence Application by Rio Algom Exploration Inc. (BHP) for the Wolverine Project, Water Licence No. 2BE-WOL----**

Applicant: Rio Algom Exploration Inc. (BHP)  
Project: Wolverine Project  
Region: Kitikmeot

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### **A. BACKGROUND**

Rio Algom, as part of BHP Holding, currently holds mineral claims in the southwest and north central regions of Victoria Island located within the Kitikmeot region of Nunavut. The Company intends to conduct airborne geophysical surveys and prospecting over the months of June, July and August of 2019. A small camp will be established to accompany their 10 workers. This is a new water licence application.

### **B. REVIEW**

#### **Comments Regarding the Project Description**

##### Reference:

- Rio Algom Exploration Inc. (BHP), Project Description, Wolverine Project, Application for Type B Water Licence 2BE-WOL----, April 2019.

#### **1. Number of Fuel Caches**

It is not clear how many fuel caches with how many drums will be stored at each site: North Block, South Block and Central Area.

##### Recommendation:

CIRNAC requests clarification on the number of drums to be stored at each site: North Block, South Block and Central Area.



## **2. Fuel Storage at Northern Block and Central Area**

CIRNAC is unclear on how many fuel drums will be in the fuel caches of the North Camp and Central area, and whether these caches will be contained in “Insta berms.”

### Recommendation:

CIRNAC recommends that the proponent provide information to indicate how many drums of fuel are to be stored and the type of containment to be implemented.

## **Comments Regarding the Fuel Spill Contingency Plan**

### Reference:

- Megan Fast on behalf of Rio Algom Exploration Inc. (BHP), Fuel Spill Contingency Plan, Wolverine Project, Application for Water Licence 2BE-WOL----, January 2019.

## **3. Units for Fuel Amounts**

In Section 3.0 of the Fuel Spill Contingency Plan, quantitative units are not displayed for all the fuel types in the Total column. CIRNAC is not clear if the units should read litres or containers.

### Recommendation:

CIRNAC recommends that the proponent add the units to quantify the fuel amounts.

## **4. Type of Jet Fuel**

It is not clear whether Jet-A or Jet-B fuel will be on site. Sections 2.2 and 3.0 of the Fuel Spill Contingency Plan reference Jet-A fuel for helicopter use to be stored in the caches. However, the Material Safety Data Sheet (MSDS) is for Jet-B fuel. Jet-A and Jet-B fuels have a different kerosene content and flashpoint.

### Recommendation:

CIRNAC recommends that the proponent clarify the type of fuel to be used, and attachment of the appropriate MSDS to the Fuel Spill Contingency Plan.



## **5. Spill Kits at the North Camp**

CIRNAC is unclear whether there will be spill kits in the North Block or stored on the aircraft.

### Recommendation:

CIRNAC recommends that the proponent have a spill kit either at the North Block, or stored on the aircraft to be used in the case of a spill in the North Block or Central Area.

## **6. Fuel Transfers**

The Fuel Spill Contingency Plan mentions fuel transfers in Section 3.1 and does not mention the use of spill trays or drip trays to catch fluids in the case of accidental spills and splashes.

### Recommendation:

CIRNAC recommends the use of spill trays during fuel transfers.