



Environment Environnement
Canada Canada

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Our file: 4703 001 004

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Via email at licensingtrainee@nwb.nunavut.ca

RE: NWB1ULU – Wolfden Resources Inc. – Ulu Project Spill Contingency Plan

On behalf of Environment Canada (EC), I have reviewed the information submitted with the above-mentioned application. The following specialist advice has been provided pursuant to Environment Canada's mandated responsibilities for the enforcement of the *Canadian Environmental Protection Act*, Section 36(3) of the *Fisheries Act*, the *Migratory Birds Convention Act*, and the *Species at Risk Act*.

Wolfden Resources Inc. has submitted a Spill Contingency Plan in fulfillment of Part E, Item 1 of license NWB1ULU0008. As activities at the Ulu site were suspended, the previous requirement for the submission of a Spill Contingency Plan (when the site was under the ownership of Kinross Gold Corp.), was waived. Therefore, this is the first Spill Contingency Plan submitted by Wolfden Resources Inc. under the license.

Environment Canada recommends that the following recommendations be incorporated into the Spill Contingency Plan:

- Section 1.3 lists Mr. Dave Tilden as the contact person within Environment Canada regarding the Spill Contingency Plan. The correct contact for inclusion in the plan is Mr. James Noble, located in Iqaluit, NU. Mr. Noble can be reached by telephone at (867) 975-4645, or by secure fax at (867) 975-4594. The 24-hour Emergencies Pager can also be contacted at (867) 920-5131.
- The Plan indicates that this document is not intended to cover response action plans for potential spills/accidents along the winter road between Ulu and High Lake. Environment Canada requests clarification regarding whether another Spill Contingency Plan addresses response action plans along the winter road route. If the road is not covered by another Plan, EC recommends that response actions along this road be included in either the Spill Contingency Plan for the Ulu or the High Lake site.
- Section 2.5 of the Plan makes reference to a "disposal site" where spilled fuel will be burned. The Spill Contingency Plan should clearly identify the location of this facility, especially in relation to water.
- In discussing response information for sewage system malfunctions, Section 5.1 states that "Tentative plans during final construction include the addition of a containment berm to provide an additional barrier prior to reaching Ulu Lake." This statement requires further detail and clarification.
- Section 5.2 of the Plan discusses uncontrolled releases of mine water. Subsection 5.2.1 "Ground Contamination" indicates that any mine water that escapes from the pipeline would either be directed to mine portal or "an alternative sump when construction has been completed – Ore Storage Pad". If this statement refers to the Settling/Neutralization Ponds



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- required under Part D, Item 1 of the license, Wolfden Resources Inc. should ensure that the Spill Plan is updated to reflect the recent amendment requests to the license dated March 24, 2006.
- The location of the spill kit on site should be clearly indicated in the Spill Contingency Plan.
 - The Detailed Response Plan for Sewage Systems should identify where the designated area for the burial of sewage sludge is located, especially in relation to water.
 - Given that Ulu Lake is the immediate receptor for potential spills from the sewage system and the mine water line and sump, it is recommended that the Detailed Response Plans for these systems include monitoring of Ulu Lake as a component of the response to determine the extent to which the spill affected this water body.
 - The Detailed Response Plans for fuels should address the possibility of sending the contaminated soils to a landfarm facility for remediation rather than shipment to a disposal site.
 - The list of Spill Containment / Recovery Materials included in Table 3 does not include an oil skimmer. Given that this piece of equipment is included in the response action for spills on water, it is recommended that an oil skimmer be available for use if required. If Wolfden Resources Inc. does not have a skimmer, it is recommended that an arrangement be made with an organization that does have an oil skimmer in order to allow this equipment to be used at the Ulu site if required. The contact information for any organization with which such an agreement is made should be included in the plan.

If there are any changes in the proposed plan, EC should be notified, as further review may be necessary. Please do not hesitate to contact me with any questions or comments with regards to the foregoing at (867) 975-4639 or by email at colette.spagnuolo@ec.gc.ca.

Yours truly,

Original signed by

Colette Spagnuolo
Environmental Assessment / Contaminated Sites Specialist

cc: (Stephen Harbicht, Head, EA North, Environment Canada, Yellowknife)