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Department of Environment

Ministère de l'Environnement

August 15, 2008

Phyllis Beaulieu
Manager of Licensing
Nunavut Water Board

via Email to: licensing@nunavutwaterboard.org

RE: NWB FILE # 3BC-BGI – University of Alberta – Belcher Glacier Research Project

Dear Ms. Beaulieu:

Thank you for your correspondence of July 23, 2008, in which the NWB requested comments on whether the water use and waste deposition as described in University of Alberta's water license application for the Belcher Glacier research project constitutes "domestic use" pursuant to section 13.7.1 of the Nunavut Land Claims Agreement (NLCA) and consequently whether the project is exempt from the requirement for a water license.

The Department of Environment (DOE) believes that the issue of domestic use and water license exemptions is best addressed through the development of the Nunavut Water Regulations. Government of Nunavut representatives on the Nunavut Water Regulations Development Group (NWRDG) will be available to discuss this issue in the context of the water regulations at future meetings of the Group.

If the NWB deems this project to require a water license based on the facts of the application in question, DOE has the following comments and recommendations to make based on the *Environmental Protection Act* regarding spill contingency and abandonment & restoration.

1. SPILL CONTINGENCY PLANNING

The proponent is advised to develop a spill contingency plan that should be provided for review, and is referred to the GN's *Spill Contingency Planning and Reporting Regulations*, and the *Contingency Planning and Spill Reporting in Nunavut: a Guide to the New Regulations*.

2. Abandonment & Restoration Plan

Snow/ice contaminated by fuel (e.g. around oil drum storage) should be treated on site or removed to an approved disposal site. The proponent is referred to DOE's *Environmental Guideline for Site Remediation*.

We thank the NWB for the opportunity to provide comments on University of Alberta's water license application. Please contact us if you have further questions.

Yours sincerely,

Original signed by

Froeydis Reinhart
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