

Reply to INAC water cancellation questions

Dr. Luke Copland, Aug. 4, 2016

1) 3BC NEI1215 Copland 100401 – Application for Water Licence Cancellation

Comment: The Licensee recognizes that their licence has expired and has indicated in their cancellation application that they intend to apply for an approval without a licence for continued research activities at the seasonal camp.

Recommendation 1: INAC encourages the Licensee to be aware of application timelines in relation to approvals without a licence in order to ensure proper authorizations are obtained for any upcoming field seasons.

Reply: We will make sure that all requests for approvals without a licence are obtained prior to upcoming field seasons

2. Format of annual reports

Source:

- 1) 3BC-NEI1215 NRI Annual Report 2015 English
- 2) 3BC-NEI1215 2014 Copland NWB Annual Reporting Form
- 3) 3BC-NEI1215 Annual Summary Report 2014
- 4) 3BC-NEI1215 NRI Annual Report 2013
- 5) 3BC-NEI1215 2012 Annual Report
- 6) 3BC-NEI1215 NRI Annual Report 0210611R (2012)

Comment: The Licensee has submitted annual reports in the form of copies of their annual report to the Nunavut Research Institute (NRI) to the NWB for each year of the current licence (2012-2015). In 2012 and 2014, the Licensee also submitted the NWB's required 'Annual Reporting Form'. The annual reports required by the NRI and forwarded to the NWB contain useful information about the project's research activities and are useful in updating the NWB on research findings and community engagement. However, they do not include information on water use and waste disposal as required in 3BC-NEI1215.

Recommendation 2: INAC recommends that the Licensee complete and submit to the NWB, the standardized 'Annual Reporting Form' for years 2013 and 2015. This information is also necessary to ensure that annual water use does not exceed that that is permissible for an approval without a licence.

Reply: The completed 'Annual Reporting Form' for 2013 and 2015 has been completed and is attached.

3. Fuel storage

Source:

- 1) 3BC-NEI1215 Copland Purple Valley Spill Contingency Plan
- 2) 3BC-NEI---- new application AANDC review

Comment: A small fuel storage area is maintained near the research camp to support field activities. According to the Licensee's Spill Contingency Plan (SCP), this area may include 2-4 drums of gasoline and up to 6 drums of Jet-B/JP-4 fuel during operation of the camp. At the completion of each field season, empty drums are removed to either Eureka or Resolute Bay for disposal by the Polar Continental Shelf Program (PCSP) as per the SCP.

Recommendation 3: INAC recommends that the Licensee update the Safety Data Sheets (SDS) included in their SCP to reflect that the site may have both Jet-B and JP-4 stored on site (currently a SDS is included only for JP-4).

Reply: we have updated the Safety Data Sheets to include documentation for Jet-B. See attached.

Recommendation 4: INAC recommends that the Licensee confirm that empty fuel drums are still being removed from the site by PCSP (or other organization), and provide the NWB with the number of full fuel drums being stored on site to support future camp/research activities (as such activities will likely be continuing upon successful application for an approval without a licence). INAC also recommends that the Licensee verify that the expected number of fuel drums on site during operation of the camp (as outlined in the SCP) is still accurate and specify the number of fuel drums for both Jet-B and JP-4, as opposed to reporting the total number. This information is required to ensure that the Licensee does not intend to store more fuel barrels than would be allowed without a water licence.

Reply: we confirm that PCSP is still removing empty fuel drums: this often occurs in the spring when they drop off new fuel drums for the upcoming field season. At the end of the 2016 field season (Aug. 1, 2016), one full drum of Jet-B was left at the site in a secondary berm. The number of fuel drums specified in the Spill Contingency Plan is still accurate (up to 2-4 drums of gasoline, 6 drums of Jet-B/JP-4).