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Your file - Votre référence
3BC-TEH
Our file - Notre référence
IQA-N 9545-2-2MEAR

November 10th, 2006

Phyllis Beaulieu
Licensing Administrator
Nunavut Water Board
P.O. Box 119
Gjoa Haven, NU, X0A 1J0

Re: 'B' Class License Application - Camp Operations - Nuna M&T Services - 3BC-THE

On behalf of the Department of Indian Affairs and Northern Development (DIAND), I have reviewed the Water Licence Application submitted by Nuna M&T Services. In reviewing this file all documents posted on the Nunavut Water Board (NWB) ftp site associated with this application have been considered. Additionally, a copy of the 2005 Annual Report for the Hamlet of Baker Lake, 3BM-BAK, has also been reviewed.

Section 25, Spill Contingency Planning, of the Supplementary Questionnaire requires the applicant to describe the types, quantities and method of storage for fuel and chemicals on site. Under Section 25, the types, quantities and method of storage are not presented for each substance listed. Furthermore, it is unclear which Material Safety Data Sheet should be referenced. Since the DIAND inspector will enforce the terms and conditions related to fuel and chemical storage, DIAND requests greater detail on these points.

Sections 32 - 35, Waste Treatment and Disposal, of the Supplementary Questionnaire speaks to sewage, greywater, solid waste, bulky items/scrap metal and non-combustible waste. These sections mention the intent to use Baker Lake municipal infrastructure (sewage lagoon and landfill). Though the additional volume of waste from the proposed camp into the municipal waste stream is minimal, DIAND notes the water licence for these facilities has expired. Thus, waste disposal using these facilities will further an unlicensed practice. Alas, the licence application does not include an agreement with the municipality for waste disposal.

Section 35, Waste Treatment and Disposal, of the Supplementary Questionnaire describes the location, dimensions, volume and freeboard for all sumps. DIAND requests an explanation of the sufficiency of a two day sump storage capacity. Also, in reviewing all documentation provided under abandonment and restoration the sump is not mentioned. DIAND requests the applicant present information pertaining

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to the abandonment and restoration of the sump.

Section 38, Abandonment and Restoration, of the Supplementary Questionnaire requires the applicant to provide a detailed description of progressive and final abandonment and restoration activities. DIAND requests the applicant provide topographic elevations to the Nunavut Water Board (NWB) in advance of camp construction. The proposed time schedule for the application, November 1st 2006 through July 31st 2007, suggests that the camp will be short lived. DIAND requests further information under Abandonment and Restoration, detailing the fate of major camp components.

Pages 17 and 48 of the Environmental Procedures Manual Tehek Road Project reference the NWT 24-Hour Spill Report Line. DIAND requests that this be amended to reflect the jurisdiction in which the proposed camp will reside. The application should include the Nunavut 24-Hour Spill Report Line, (867) 920-8130. DIAND would also like to direct the applicant to the Nunavut Spill Response Form which is located on the NWB's ftp site under the following link; <http://nunavutwaterboard.org/ftp/?d=ADMINISTRATION/Standardized%20Forms> Additionally, the Director of Field Operations for DIAND, Mr. Peter Kusugak, (867) 975-4295, should be included as an initial contact.

Finally, the Minister of Indian and Northern Affairs Canada (Minister) has yet to indicated his decision on the Nunavut Impact Review Board's final recommendations for the Meadowbank Gold Project. DIAND would prefer the approval of 'B' class licence application, 3BC-TEH, not be granted until the Minister has reached his decision on the Meadowbank Gold Project. However, under Schedule 13.5.5 the Nunavut Water Board may issue an interim licence for 3BC-TEH before the Minister reaches his decision.

Should you have any questions or comments, please do not hesitate to contact me at (867) 975-4548 or by email at BathoryS@ainc-ianc.gc.ca.

Sincerely,

Original Signed By

Stephen Bathory
Regional Coordinator