



Nunavut Regional Office
P.O. Box 100
Iqaluit, NU, X0A 0H0

Your file - Votre référence
3BC-TEH0707
Our file - Notre référence
9545-2-2MEAG / CIDMS # 159678

August 4th, 2007

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

Re: Licence Amendment – Road Construction Camp –
Nuna M & T Services Limited

Indian and Northern Affairs Canada (INAC) has performed a review of the licence amendment submitted to the Nunavut Water Board (NWB). In conducting our review INAC has made reference all documents in the 3BM-TEH0707file on the FTP-site.

INAC feels that the current licence is written in such a way that it can capture all project changes as presented in the current application. INAC feels all licence terms and conditions should be equally applied to both road construction camps. That said, INAC suggests the following amendments be made to 3BC-TEH0707.

Part B: General Conditions

INAC requests the applicant be required to clearly distinguish between the two camp sites in all reporting, including the Annual Report. Meaning all subsections of Part B, Item 2 should apply to both camps. Although INAC encourages the applicant to produce collective data and information, readers should be able to distinguish between data and information generated for the original camp and the camp in this application.

Part C: Conditional Applying to Water Use

Item 1 states “The volume of water for the purpose of this Licence shall not exceed 10 cubic meters per day”. Since the original construction camp will be completely abandoned, INAC suggests this condition apply to the *“small unnamed lake directly to the south east of the proposed camp location”*, see Supplementary Questionnaire, Section 26.

That said, INAC has found a discrepancy in the information provided to the NWB. The cover letter accompanying the Water Licence Amendment Application (dated June 27,

2007) states all water for the camp will be sourced in from the Hamlet of Baker Lake and will be hauled to the camp. INAC requests the NWB clarify this with the applicant. Once clarified, the licence wording should be amended to reflect the water source.

Though absent from the application INAC expects the current method of grey and black water disposal would be similar to the current construction camp which used a 110 barrel storage tank in conjunction with a contingency sump in the event that access to the Hamlet sewage lagoon is not possible due to storms. Since no site for the contingency sump has been presented, INAC suggests Part C, Item 6 apply to the contingency sump.

Part G: Conditional Applying to Spill Contingency Planning

INAC suggest the proponent be required to update their Spill Contingency Plan to reflect and changes due to the re-location of the camp.

Part H: Conditions Applying to Abandonment and Restoration

Item 2 states *“The Licensee shall carry out progressive reclamation of any components of the project no longer required for the Licensee’s operations”*. Since this amendment is to allow the camp to be relocated further up the newly reconstructed road INAC expects the proponent will fully restore the original camp site in accordance with the terms and conditions set out in Part H. Furthermore, INAC expects that Part H would also apply to the new camp location.

General Comments

It is not unusual for projects like the Meadowbank Gold Mine to require construction and the mobilization of equipment and resources in advance of formal project development. While pre-development project activities can unfold in ways that a proponent cannot fully anticipate, it can nonetheless be preferable to avoid instances where multiple water licenses cover a single project in a common geographic area given that multiple licenses can render administration, monitoring, inspection, and enforcement more complex.

Based on past INAC submissions on Type-B licence applications for the Meadowbank Project it is clear INAC would prefer to move towards one all encompassing Type-A licence for this project. As such, INAC hopes another amendment application (for a third camp or a longer term) for this licence will not be sought prior to the submission of a larger all encompassing Type-A licence. Finally, INAC recognizes Part B, Item 6 “if the Licensee contemplates or requires an amendment to this licence, the NWB may decide, in the public interest, to hold a public hearing.” Though INAC is not suggesting the NWB call a hearing for this licence at this time, our intent is to ensure all project components become licenced under one Type-A licence in a timely manner.

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