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3BM-PEL

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9545-1-3PELG / CIDMS 151841

June 6th, 2007

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

**Re: 3BM-PEL, Hamlet of Kugaaruk, Sewage Lagoon Upgrades,
Water Licence Application - Response to Additional Information Request**

The Water Resources Division of Indian and Northern Affairs Canada (INAC) has performed a review of additional information requested from the Nunavut Water Board (posted on the Nunavut Water Board's FTP-site on June 6th, 2007). The additional information posted includes three files: Sewage and Solid Waste Facility, Kugaaruk, Nunavut, Pre-Design Report (July 22, 2005), Sewage and Solid Waste Sites, Kugaaruk, NU, Pre-Design, Phase II (February 2006) and Nunavut: Community Population Projections.

INAC would like to echo comments previously submitted to the NWB (June 6th, 2007) whereby INAC recommends the NWB require the applicant submit additional information and clarify what information interveners should review during their analysis. Though the additional information guides the NWB and regulatory bodies through its application in a more fluid logical manner INAC feels there is still confusion over what materials should be reviewed. For instance pages 87-92 of the Sewage and Solid Waste Sites, Kugaaruk, NU, Pre-Design, Phase II (February 2006) presents a series of technical design plans with a date range of August 2, 2005-August 25th, 2005. The tender specifications (060808 3BM-PEL Tech Drawings-ILAE) and preliminary specifications (060531 3BM-PEL Sewage Lagoon Diagrams 05-4755) contain technical design plans dated May 2006. Thus, INAC requests the NWB provide interveners guidance as to which documents the NWB is seeking comments on.

Furthermore, INAC suggests the NWB require the applicant to submit a comprehensive document which includes only the most recent information. The comprehensive submission should clearly demonstrate how the applicant has responded to the two documents authored by the NWB (060621 3BM-PEL9803 NWB Technical Concerns and Meeting Discussion-OTAE(June 26, 2006) and 061114 3BM-PEL9803 Response to Kugaaruk for Amendment Application-OT4E(November 14th, 2006)).

INAC encourages the applicant develop their project design and water management beyond

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the conceptual and intermediate phases before submitting a water licence application. Meaning all information submitted by the applicant should be considered final versions based on finalized plans. Thus, INAC recommends the NWB require the applicant file a comprehensive report which includes final design plans, stamped, signed and dated by a qualified professional, with the NWB in advance of project implementation. INAC also recommends the NWB require the applicant to file final as-built designs, stamped, signed and dated by a qualified professional, with the NWB after implementation. Finally, INAC requests the opportunity to review the entire 3BM-PEL water licence application once deemed complete by the NWB.

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