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NUNAVUT WATER BOARD
NUNAVUT IMALIRIYIN KATIMAYINGI
OFFICE DES EAUX DU NUNAVUT

August 24, 2015

3BC-EUR1116

Jean-Philippe Cloutier-Dussault
A/Manager, Technical Analysis and Development Assets
Real Property and Security Directorate
Biosphere, Environment Canada
160, chemin tour de l'Île, Ste-Helene
Montreal, Quebec, H3C 4G8
Email: Jean.Philippe.Cloutier-Dussault@ec.gc.ca

Subject: 3BC-EUR1116 Response to Applicant for Amendment to the Licence – Type “B”

Dear Mr. Cloutier-Dussault:

On July 14, 2015, the Nunavut Water Board (NWB) received from Environment Canada (EC) an Application to amend Water Licence 3BC-EUR1116. The Application included the following documentation:

- Signed Amendment Application, dated July 14, 2015; and
- English and Inuktitut Project Summary.

The NWB understands from the above-mentioned documents that the Eureka Station intends to undertake the following activities for which an amendment to the Licence was proposed:

- Recapitalize the runway surface at the Eureka Station; and
- Build a new 540 m2 multi-purpose building next to the existing main complex.

In tandem with the submitted documentation, the NWB reviewed the annual reports, Management Plans and other relevant documents received from the Licensee since the issuance of the Licence in 2011. At the end of its review, based on the materials received to date, the NWB has concluded that the projects involving the recapitalization of the runway and the construction of the multi-purpose building, as described in the above mentioned application, do not appear, to the Board, to require an amendment to the Licence. Please note that the NWB has come to this conclusion based solely on the information provided to date and the assumptions listed below. EC is advised that should any of the information received to date or any of the assumptions listed below subsequently be determined to be inaccurate or incomplete, the NWB should be advised immediately. The Board reserves the right to reconsider whether the proposed activities necessitate an amendment in light of corrected, revised or additional information being received. The Board's conclusion that an amendment to the existing licence is not required at this time is based on the following key assumptions:

- The additional proposed project activities will not alter the classification of the primary undertaking; i.e. the authorized water use and waste disposal activities will continue to serve a Municipal/Camp purpose.
- The activities will not result in a change to the location or quality of the water source.
- No new water type authorizations are required for the activities.

- Total water use volumes are expected to increase as a result of the activities and peak at 5.6 m3/day in 2016; however, this volumes still falls within the allowance prescribed by the current Licence (10,000 m3/year)
- The activities will not result in the deposit of any waste types not already approved under the current licence, and all waste will be disposed of in an approved facility.
- The activities will not require the construction of, or the alteration to, water supply or waste management infrastructure.
- The activities will not require quarrying, and will not cause extensive land-disturbance, creating potential for waste to enter waters through runoff.

Ultimately, it is the responsibility of the Licensee to appropriately classify the impact of its activities, and if any of the above assumptions are incorrect, or if the activities will require alterations to water use and waste disposal types, volumes or methodologies, the responsibility lies with the Licensee to correctly inform the Board. EC is also cautioned that the Board's conclusions that an amendment to the water licence is not required to support the additional proposed activities does not affect the requirements of any other regulatory authority that may have regulatory authority over the project activities, and it remains the responsibility of the Licensee to ensure that the activities described above conform to any other regulatory requirements or authorizations.

Lastly, although an amendment to the Licence does not appear to be required at this time, the NWB observes that the recapitalization of the runway and the construction of the multi-purpose building will likely necessitate changes to the Licensee's Management Plans (e.g. Operation and Maintenance, Emergency Plan, and Abandonment and Reclamation) to accommodate the construction and operations of the temporary worker's camp. Consequently, the NWB expects the Licensee to reflect any such changes in the form of addendums to the Plans, to be submitted with the 2015 Annual Report.

If you hold any further questions or concerns related to the file, please contact the NWB's Licensing Department: licensing@nwb-oen.ca ; or the Technical Advisor assigned to the file, Brady MacCarl: brady.maccarl@nwb-oen.ca.

Sincerely,



Brady MacCarl
Technical Advisor
NWB