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Your file - Votre référence
8BC-HIG
Our file - Notre référence
IQA-N 9545-1-2HIG

December 15th, 2006

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

Re: 'B' Class License Application - Sand Lake Airstrip - Wolfden Resources -
8BC-HIG

On behalf of the Department of Indian Affairs and Northern Development (DIAND), I have reviewed the Water Licence Application submitted by Wolfden Resources. In reviewing this file all documents posted on the Nunavut Water Board (NWB) ftp site associated with this application have been considered. Additionally, NWB licence NWB2HIG0506, has also been reviewed.

Spill Contingency Plan

DIAND recommends the Spill Contingency Plan (SCP) include documentation of the training and expertise held by personnel identified on page six of the SCP. Assessing the training and expertise of key personnel is vital to ensuring containment, clean-up and disposal of hazardous material(s) is conducted in the most appropriate manner.

Section 4, Operations Systems Malfunction Prevention, suggests sewage lines and the fresh water line will be inspected regularly. DIAND requests to know the inspection frequency of this infrastructure.

Section 5.1, Sewage, states treated effluent at the Sand Lake construction camp will empty into a small lake south of Sand Lake that drains into the Kennarctic River. This information is not consistent with Section 7 of the Water Licence Application Form which states Pacto toilets will be used. Furthermore, the method for grey water disposal is unclear. DIAND requests the proponent characterize the grey water sump in greater detail. Specifically, the proponent should describe the holding capacity of the sump and any abandonment and restoration plans. DIAND requests the proponent clarify plans for sewage and grey water disposal at the Sand Lake construction camp and amend their application accordingly. Once amended, DIAND requests the opportunity to revisit this information before a licence is issued.

Appendix 4, MSDS Sheets, appears blank on the ftp-site. DIAND would like the opportunity to verify if MSDS sheets were provided for all materials listed in the SCP.

NIRB Screening Decision Report

DIAND requests that all water related Terms and Conditions appearing in the NIRB Screening Decision Report are implemented in the water licence.

Project Description

Section 4.4.3, Workforce Accommodations, states a small self-contained Rotating Biological Contactor will be used to treat sewage at the Sand Lake Construction Camp. The treated effluent is said to be discharged into the Kennarctic River. Again, DIAND requests the proponent clarify plans for sewage and grey water disposal at the Sand Lake construction camp and amend their application accordingly.

Section 4.4.5, Fuel Handling and Storage, the tank volumes and numbers listed in this section are not consistent with Section 25 Exploration/Remote Camp Supplementary Questionnaire. DIAND requests these sections be amended to be consistent and clear. Furthermore, DIAND requests the proponent explain their methodology for handling water that accumulates within the fuel storage berm.

Section 4.5.3, Stream Crossings, DIAND requests that stream cross sections be provided for all stream crossings. Furthermore, the type of bridge and abutments used for the 20m span bridge should be described prior to construction. Additionally, all technical details and as built designs should be submitted to the NWB 90 days after construction.

Exploration/Remote Camp Supplementary Questionnaire

Section 18, Drilling Information, and Section 27, Water Supply and Treatment mention NWB licence NWB2HIG0506. DIAND notes that licence NWB2HIG0506 expired on November 1, 2006. Rather than licence project components individually, DIAND would prefer if one 'B' class licence could be issued for the entire High Lake Project. The proponent should renew licence NWB2HIG0506 and then seek an amendment which would include all activities mentioned in the application for 8BC-HIG. A comprehensive 'B' class licence could then be valid until an 'A' class licence is issued. Should an 'A' class licence be issued, then the 'A' class licence would regulate all project activities. In the event that an 'A' class licence is not issued, all project components will still be licenced under 'B' class licence.

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