From: Cardona, Marie (Vancouver)
Sent: December-21-16 2:22 PM
To: Valerie Kogvek (valerie.kogvek@nwb-oen.ca)
Cc: Andrus, Karina (Vancouver); Gibson, Jeffrey (Vancouver); Wright, Stewart (Vancouver); Cloutier, Claudette (Vancouver); Kullmann, Harald (Vancouver); pmulak@gov.nu.ca
Subject: Type B NWB Application - Public Consultation Comments - Responses - Pond Inlet SCH Project

Hi Valerie,

Please find below and attached the ***responses*** to the comments submitted by INAC regarding our Water License application for the Pond Inlet Small Craft Harbour Project.

The five questions INAC submitted are copied below with our responses. A modified management plan and a copy of the INAC letter is attached as well.

Please let us know if you have any questions and we look forward to your response.

Thanks,
Marie

INAC Comments

1. Water source for drilling
Source:
1) 8BD-PIH---- Type B Water Licence Application Signed, Section 13: Quantity and Quality of Water Involved

Comment: The Water Licence Application has identified two potential sources of water to be used for drilling: seawater and treated freshwater obtained from the Hamlet of Pond Inlet. The Application also states that the source of the water will be confirmed by the contractor. No information is provided as to whether the any freshwater (non-treated) sources of water will be used for drilling. No information is provided regarding water storage at the project areas.

Recommendation 1: INAC recommends that the Applicant confirm the water source(s) for drilling with the NWB and INAC Inspector once a final decision on water source has been made. INAC also recommends that use of water from different sources be noted in annual report(s). INAC also notes that use of freshwater from the municipality may not require a separate Water Licence for water use.

Response: *It has been determined that freshwater use is unlikely and sumps will not be needed. If freshwater is used, it will be a local municipal source.*

2. Quantity of water used for drilling and returned to source
Source:
1) 8BD-PIH---- Type B Water Licence Application Signed, Section 13: Quantity and Quality of Water Involved

Comment: The Water Licence Application states the overall estimated quantity of water to be used as 2 m3/day; but also states that 2 m3/day may be used from each of the sources identified (seawater or treated freshwater). The Applicant advises that 2 m3/day will be returned to the source(s).

Recommendation 2: INAC recommends that the Applicant clarify whether the two identified sources of water are expected to be used concurrently for a total use of 4 m3/day (and hence 4 m3/day returned to source) or if 2 m3/day is sufficient volume for the undertaking.

Response: *Advisian can confirm that 2 m3 per day is sufficient, regardless of water source.*

3. Site map and study area
Source:
Page **3** of **3**
1) Study Area Pond Inlet

2) Pond Inlet Topo
Comment: The Applicant has provided a topographic map and satellite image of the municipality, highlighting the proposed small craft harbour area and the proposed quarry area. The map and image provided do not include detailed information regarding water use, waste disposal, hazardous materials storage or location of spill kits.
Recommendation 3: INAC recommends that the Applicant provide a more detailed map that includes locations of water use, waste disposal, monitoring sites, storage of hazardous materials and spill kits.

Response: *Additional maps will be provided ahead of drilling that will show borehole locations, hazardous materials storage, and spill kit locations.*

4. Drill cuttings disposal
Source:
1) 8BD-PIH---- Type B Water Licence Application Signed, Section 15: Quantity and Quality of Waste Involved

Comment: The Applicant has advised that drill ('environmentally friendly') muds and cuttings will be recirculated to the seafloor after drilling. While this may be reasonable for the drilling that will occur in the marine environment, it does not make sense for disposal of the cuttings from the quarry area.

Recommendation 4: INAC recommends that the Applicant clarify the waste disposal measures for drill cuttings and muds from the quarry area drilling, i.e. will they be contained in an on-land sump where waste may enter a water body? If drill cuttings are to be disposed of on land where waste may enter water, INAC recommends that a Water Licence include standard terms and conditions regarding on land drill cutting disposal; ensuring that drill cuttings are not deleterious in nature.

Response**:** *Drill cuttings associated with the quarry drilling are anticipated to be minimal, i.e, <500 litres per borehole. These cuttings will be disposed of on land and should not enter the waterbody. No impacts to freshwater are anticipated.*

5. Spill Prevention Plan
Source:
1) 8BD-PIH---- Spill Prevention Plan
2) 8BD-PIH---- Type B Water Licence Application Signed
3) 8BD-PIH---- Non-technical summary Pond Inlet

Comment: The submitted Spill Prevention Plan includes procedures for spills that occur on land and water. Application materials however specify that drilling may occur on ice and that some sampling will occur during the fall season. This means that staff for this project may also encounter snow conditions.

Recommendation 5: INAC recommends that the Applicant submit an updated Spill Prevention Plan that includes response measures to be taken if spills occur on snow or ice.

Response: *Section 4.2.4 of the Spill Prevention Plan has been revised to include spills on snow and ice and is attached.*

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