

File: S04A-006
S04L1-006
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Environmental Protection Branch
Suite 301, 5204 - 50th Avenue
Yellowknife, NT, X1A 1E2

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|---------------|------------------------|---------------|---------------------------------|
| DATE: | <u>August 20, 2004</u> | FROM: | <u>Ivy Stone</u> |
| TO: | <u>Murray Peacock</u> | | <u>Environmental Assessment</u> |
| | | | <u>Environment Canada</u> |
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Number of pages including cover: 4

Subject: S04A-006 & S04L1-006 - Summit Creek Drilling Program, Land Use Permit and Water License Applications
Proponent - Northrock Resources Ltd., Calgary, Alberta

MESSAGE:

Please find attached Environment Canada's comments on the above-mentioned file. Please call if you have any questions.

Sincerely,



Ivy Stone
Environmental Protection Branch



Environment Environnement
Canada Canada

Environmental Protection Branch
Suite 301, 5204 - 50th Avenue
Yellowknife, NT, X1A 1E2

August 19, 2004

Murray Peacock
Land/Resource Geographer
SAHTU Land & Water Board
P.O. Box 1
Fort Good Hope, NT
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Our file: 4702 039 001

Via facsimile

Re: S04A-006 & S04L1-006 – Summit Creek Drilling Program - Land Use Permit & Water License Applications
Proponent – Northrock Resources Ltd., Calgary, Alberta

On behalf of Environment Canada (EC), I have reviewed the information submitted with the above-mentioned application. The following comments are provided pursuant to Environment Canada's mandated responsibilities for the enforcement of the *Canadian Environmental Protection Act*, Section 36(3) of the *Fisheries Act*, the *Migratory Birds Convention Act*, and the *Species at Risk Act*.

Northrock Resources Inc. has submitted applications for a Land Use Permit and a Water License for a drilling program located at Summit Creek. The project involves the preparation of a drilling lease, a camp, opening access from an existing access road to the drilling location and water source, as well as the drilling of an exploratory well. Activities will be centered in an area approximately 60 km south of Tulita, NT and specific wellsite locations will depend on interpretation of 2004 seismic data. The program will start October 1, 2004 with a projected end date of April 30, 2005. A 34-man mobile camp and a 60 man camp will be set up near the wellsite. There is no indication that fuel caches will be established.

Environment Canada recommends that the following conditions be applied throughout all stages of the project:

1. The proponent shall not deposit, nor permit the deposit of chemicals, sediment, wastes, or fuels associated with the project into any water body. According to the *Fisheries Act*, Section 36 (3), the deposition of deleterious substances of any type in water frequented by fish, or in any place under any conditions where the deleterious substance, or any deleterious substance that results from the deposit of the deleterious substance, may enter any such water, is prohibited.
2. The proponent states they will treat grey and black water before discharging to the Mackenzie River or to a sump. Please note that release of treated black water into the Mackenzie River may be in direct contravention of the *Fisheries Act*, Section 36(3). Environment Canada recommends, therefore, that grey water and treated black water be contained in a sump located such that the contents do not enter water frequented by fish.
3. Any sumps, pits, spill basins and fuel caches shall be located above the high water mark of any waterbody and in such a manner as to prevent the contents from entering any waterbody frequented by fish. Therefore, please note that maintaining a buffer of a specific distance may not always be an adequate preventative measure.
4. Environment Canada recommends the use of drip pans, or other similar preventative measures, when refueling equipment on site.
5. The proponent shall ensure that all hazardous wastes, including waste oil, receive proper treatment and disposal at an approved facility.
6. Environment Canada recommends the use of an approved incinerator for the disposal of combustible material.
7. All non-combustible solid wastes (e.g., potable water bottles) shall be disposed of at an appropriate facility, e.g., Yellowknife, NWT or Inuvik, NWT. The proponent is encouraged to make use of recycling facilities for all recyclable materials.

8. Environment Canada recommends the use of secondary containment with an impervious liner, such as self-supporting insta-berms, for storage of all barreled fuel rather than relying on natural depressions to contain spills.
9. Fuel caches shall be inspected on a regular basis.
10. Please note that any material and equipment cached for this study must be removed at the end of the project.
11. All spills are to be documented and reported to the NWT 24 hour Spill Line at (867) 920-8130.

The following comments are relative to the Spill Contingency Plan submitted with Northrock Resources Ltd. Land Use Permit and Water License Application.

Level One Action (page 13)

12. Spill contingency plans should include locations of disposal sites approved to accept wastes and means of storage prior to disposal.
13. Any spills of wastes or hazardous materials shall be reported immediately to the NWT 24-hour Spill Line, number (867) 920-8130.

Section 2.6

14. "For larger spills, equipment and material is to be requested from Imperial Oil in Norman Wells and/or Embridge Pipelines at Tulita or the KP 160 pumping station. Neither is, however in a position to provide supervisory personnel or manpower required for the equipment deployment."
 - a) For an effective spill response there must be some expertise on site to direct the equipment deployment operations. To ensure that the Spill Response Team is prepared to respond to a spill situation in a reasonable manner, hands-on training and familiarization with equipment used for spill containment and recovery is critical. It provides the response crews with an understanding of the limitations or potential problems that may be encountered in the use of the various equipment pieces.
 - b) Personnel should be aware of the properties of the products that they handle and have access to material safety data sheets (MSDS) and other sources of information

Section 4.1

15. Environment Canada is a signatory party to the NORTHWEST TERRITORIES/NUNAVUT SPILLS WORKING AGREEMENT, NWT 24 hour Spill Response Line.

Recommendations

16. A spill contingency plan aimed at reducing potential risks should provide the following elements:
 - a) A description of the properties and characteristics of the substances, maximum expected quantity, storage location, and potential consequences from an environmental emergency on the environment or human health.
 - b) Identification of any reasonable environmental emergency expected to occur
 - c) Description of the measures to be used to prevent, prepare for, respond to and recover from any environmental emergency identified above.
 - d) List of individuals, identified by name or position, who are to carry into effect the plan and description of their roles and responsibilities.
 - e) Identification of training required
 - f) List of emergency equipment and its location.
 - g) Identification of measures to be taken to notify members of the public who may be adversely affected by an environmental emergency.

The Canadian Wildlife Service (CWS) of Environment Canada has reviewed the above-mentioned land use permit and water licence application and makes the following comments and recommendations pursuant to the *Migratory Birds Convention Act and Regulations*, and the *Species at Risk Act*.

17. Section 6 (a) of the *Migratory Birds Regulations* states that **no one shall disturb or destroy the nests or eggs of migratory birds**. Drilling activity for this project is scheduled to occur outside the migratory bird breeding season, May 1-August 1, and as long as drilling activities occur between October 2004 and April 2005, CWS does not foresee any direct impacts on nesting or moulting birds.
18. Section 35 of the *Migratory Birds Regulations* states that no person shall deposit or permit to be deposited, oil, oil wastes or any other substance harmful to migratory birds in any waters or any area frequented by migratory birds.
19. Implementation of these measures may help to reduce or eliminate some effects of the project on migratory birds, but will not necessarily ensure that the proponent remains in compliance with the *Migratory Birds Convention Act (the Act)* and *Migratory Birds Regulations (the Regulations)*. The proponent must ensure they remain in compliance with the *Act* and *Regulations* during all phases and in all undertakings related to the project.
20. The *Species at Risk Act (SARA)* came into full effect on June 1, 2004. Species at risk that may be encountered in this area include: Peregrine Falcon (subspecies anatum) and Woodland Caribou (Boreal population) both listed as Threatened on Schedule 1 of SARA; and Grizzly Bear, Wolverine, and Short-eared Owl all of which are listed as Special Concern on Schedule 3 of SARA. While conducting their operations, the proponent should be aware of the special status, and minimize disturbance to, or contact with, these species.
21. CWS recommends that camp waste be made inaccessible to wildlife at all times. Camp waste can attract predators of migratory birds (e.g. foxes and ravens) to an area if not disposed of properly.
22. All mitigation measures identified by the proponent, and the additional measures suggested herein, should be strictly adhered to in conducting project activities. This will require awareness on the part of the proponents' representatives (including contractors) conducting operations in the field. Environment Canada recommends that all field operations staff be made aware of the proponents' commitments to these mitigation measures and be provided with appropriate advice / training on how to implement these measures.

If there are any changes in the proposed project, EC should be notified, as further review may be necessary. **Please note that if the timetable for drilling activities changes, Environment Canada may have additional comments and recommendations to make.** Please do not hesitate to contact me with any questions or comments with regards to the foregoing at (867) 669-4708 or by email at ivy.stone@ec.gc.ca.

Sincerely,



Ivy Stone
Environmental Assessment

cc: Steve Harbicht (Head, Assessment & Monitoring, EPB, Environment Canada, Yellowknife, NT)
Mike Fournier (Northern Environmental Assessment Coordinator, EPB, Environment Canada, Yellowknife, NT)