



April 19, 2010

Li Wan
Technical Advisor
Nunavut Impact Review Board

via Email to: info@nirb.ca

RE: NIRB 04EN022: Comment Request for Potential 12.4.3 Exemption to Commander Resources Ltd's "Baffin Gold Project" project proposal

Dear Mr. Wan:

The Government of Nunavut, Department of Environment (DOE) has reviewed the "Potential 12.4.3 Exemption to Commander Resources Ltd's "Baffin Gold Project" project proposal" application from the Nunavut Impact Review Board (NIRB).

The NIRB is asking for interested parties to provide comments for the NIRB's consideration regarding:

- whether the proposed component or activity was a part of the original proposal;
- whether its inclusion would significantly modify the project;
- any additional mitigation measures that are appropriate; and
- any other matter of importance to the Party related to the project proposal.

DOE's understanding is that the following activities were not part of the original proposal:

- Refurbishment of existing Dewar camp on Crown Lands;
- Establishment and operation of a new camp (including an ice airstrip) at Malrok Lake on IOL;
- Aircraft use (both fixed wing and helicopter) for mobilization of personal, drills and supplies;
- Winter road use;
- Soil and sediment sampling;
- Diamond drilling (both land-based and on ice);
- Snowmobile and other vehicle use

The establishment and operation of a new camp; and the increase in the duration and intensity of exploration activities (both drilling, aircraft use, and road use) represents a significant modification of the project from the original 2004 proposal.

DOE also wishes to identify another matter of importance to the Party. The proponent should be aware that they are currently operating in the most significant calving ground for the South Baffin caribou population (Elliott, R.C. and C.E. Elliott, 1974; Ferguson et al., 1998). This is one of the only known calving areas on Baffin Island and it was identified as a WASI in 1987 and again in 1995. Any future flight, drill or camp activities would require the development of measures to mitigate the potential for disturbances to caribou.

The DOE thanks the NIRB for giving us the opportunity to review and provide comments on the Baffin Gold Project project proposal. Please contact us if you have any further questions or comments.

Yours sincerely,

Original signed by

Dilek Dee Karadag
Territorial Environmental Assessment Coordinator/Scientist
Department of Environment
Government of Nunavut
PH: (867) 975-7732
FX: (867) 975-7739
EM: dkaradag@gov.nu.ca

References:

Elliott, R.C. and C.E. Elliott, 1974. Observations of the Distribution and Migration of Caribou on Southern Baffin Island, July 4 - August 1974. Game Management Service, Government of the NWT.

Ferguson, M.A., Williamson, R.G., Messier, F. 1998. Inuit Knowledge of Long-term Changes in a Population of Arctic Tundra Caribou. 51(3):201-219.

CC: **Debbie Jenkins**, Wildlife Regional Biologist, Wildlife Division
Government of Nunavut, Department of Environment