



Environment Environnement
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NIRB file: 04EN022

Maria Quqsuut
Environmental Administrator
Nunavut Impact Review Board
PO Box 1360
Cambridge Bay, NU
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Via email: info@nirb.ca

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

Thank you for the opportunity to provide input into the Nunavut Impact Review Board's (NIRB) request for review of Commander Resources Ltd.'s (Commander) request for exemption for its Baffin Gold Project proposal. The following specialist advice has been provided pursuant to the *Canadian Environmental Protection Act*, Section 36(3) of the *Fisheries Act*, the *Migratory Birds Convention Act*, and the *Species at Risk Act*.

Commander Resources Ltd. is proposing a continuance of mineral exploration for gold at their Baffin Gold Project. Activities have occurred since 2003 and are planned to continue through 2010-2011. Activities will include ground geophysics, prospecting, rock sampling, geological mapping, and diamond drilling and will be based at their Dewar and Malrok Lake camps. These camps will house 40 people and 20 people at capacity, respectively.

Environment Canada provides the following comments for NIRB's consideration:

- Environment Canada would like to remind the proponent that the *Canadian Environmental Protection Act* has put forward CaCl to be listed as a toxic substance. The proponent shall therefore ensure that if CaCl is used as a drill additive, all sumps containing CaCl are properly constructed, located and closed in such a manner as to ensure that the contents will not enter any water body.
- For Chemical Transportation and Storage of the Part II NIRB document, CaCl storage shall be located above the high water mark of any water body and stored such that it is protected from water
- Land-based drilling should not occur within 30 m of the high water mark of any water body.
- If an artesian flow is encountered, the drill hole shall be immediately plugged and permanently sealed.
- All drilling effluent should be directed to a sump that is properly constructed and adequately sized to ensure there is no runoff and that water bodies downstream of drilling activities are not affected. All efforts shall be made to prevent drill mud, drill additives, return water and cuttings from migrating from the drill site.
- The addition of lime to the sumps or the use of other suitable treatment measures to neutralize acids and precipitate metals should be considered where appropriate.

- As fuel bladders will be used for fuel storage, they should be monitored during winter months to ensure that snow does not accumulate on top of the bladder as the added pressure can force fuel out of the bladder causing spills.

Comments previously submitted by EC still apply to this project. If there are further changes in the proposed project, EC should be notified, as further review may be necessary. Please do not hesitate to contact me with any questions or comments with regards to the foregoing at (867) 975-4631 or by email at Paula.C.Smith@ec.gc.ca

Yours truly,

Original signed by

Paula C. Smith
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cc: Carey Ogilvie (Head, EA-North, EPO, Yellowknife, NT)
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