



Canadrill-CBCL Joint Venture
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March 15, 2021

Felexce Ngwa
Manager, Impact Assessment
Crown Indigenous Relations and Northern Affairs Canada (CIRNAC)
P.O. Box 100
Iqaluit, Nunavut X0A 0H0

Dear Felexce Ngwa:

RE: Clyde River Harbour Development, NU, Geotechnical Investigation and Environmental Assessment Program, CIRNAC Comments to the Nunavut Impact Review Board (NIRB)

Canadrill-CBCL Joint Venture (Canadrill-CBCL) has prepared this letter in response to CIRNAC's comments to NIRB on the Notice of Screening for Fisheries and Oceans Canada – Small Craft Harbours' "Clyde River Small Craft Harbour – Clyde River Geotechnical and Sampling Program" Project Proposal, dated March 10, 2021.

CIRNAC Comments

It is understood that CIRNAC's concerns are related to potential impacts related to the management of fuels and hazardous material. Specifically, CIRNAC questioned whether the drill set-up will be moved away from the shoreline for refuelling and whether fuel and hazardous material used onsite will be stored away from the shoreline when not in use. Further, CIRNAC referred to two common practices to consider implementing for this project:

- Storing fuel and hazardous material a minimum of 31 metres away from the high water mark and in a manner to prevent release to the environment
- Re-fuelling of equipment a minimum of 31 metres away from the high water mark

Response

The drill set-up will be initially fuelled on land, at a location greater than 31 m from the high water mark. When feasible, (e.g., for drilling over land) refuelling will be carried out at a location greater than 31 m from the high water mark. However, re-fuelling of the drill set-up will be required while drilling on ice and relocation of the drill rig will not be possible. The procedures detailed in the Regulatory Compliance and Environmental Management Plan (RCEMP) will be followed, and the following clarifications and additional procedures will be added to further protect against potential releases during refuelling:

- Personnel must remain in attendance during refuelling to monitor fuel levels in the fuel tank being filled. Fuel transfer will be stopped prior to reaching the maximum fuel capacity to prevent spills from overfilling.
- Portable containment equipment will be positioned under the tank-to-hose connection to capture potential fuel spills due to overfilling during refuelling or drips when disconnecting the hose.
- Refuelling hose will be lifted to drain back to the portable fuelling tank (i.e., the tank in the truck) prior to disconnecting.
- Fuel tanks will be re-sealed immediately after refuelling is completed and hose is disconnected.
- When not in use, fuels and hazardous materials will be stored a minimum of 31 metres away from the high water mark and in a manner to prevent release to the environment.

Ongoing Consultation and Communication

Consultation has been carried out with the community of Clyde River in November 2018, May 2019, November 2019, February 2020, September/October 2020, and February 2021. This has included meetings with Council, the Nangmoutaq Hunters and Trappers Organization of Clyde River, the local Qikiqtani Inuit Association representatives, and numerous Inuit Qaujimajatuqangit (IQ) workshops. The planned field programs were presented to the community and discussed at each meeting and IQ has been considered in all project phases and activities.

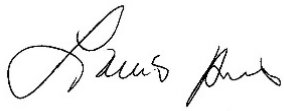
At the most recent consultation in February 2021, safety precautions and environmental management plans were outlined in community meetings and IQ sessions. In addition to the meetings and correspondence with the community, we are coordinating with the Hamlet of Clyde River and are renting their loader for this project, we've hired local support to check ice thicknesses and provide their knowledge of historic ice thicknesses, we will hire a local wildlife monitor, and will be using the local hotel and cultural center for accommodations.

Closure

We trust this letter responds to CIRNAC's comments to support the NIRB screening and CIRNAC review of the 2021 geotechnical field program in Clyde River. If you have any questions or require further details, please do not hesitate to contact the undersigned.

Yours very truly,

CBCL Limited



A handwritten signature in black ink, appearing to read 'Loretta Hardwick'.

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A handwritten signature in blue ink, appearing to read 'Kevin Bezanson'.

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c.c. Eleanor McEwan, DFO Small Craft Harbours