

September 15, 2021

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RE: Comments Response for WKG Arcadia Bay Project

West Kitikmeot Gold Corp. (“WKG”) has reviewed the comments provided from Crown-Indigenous Relations and Northern Affairs Canada (“CIRNAC”) and would like to express our appreciation to the agency for reviewing the proposed water licence assignment and providing comments and to thank the Nunavut Water Board (“NWB”) for the opportunity to respond to the comments.

A summary of the comments/recommendations received are:

- R-01. Time-Table for implementation.
- R-02. GPS Co-ordinates for all water use sources.
- R-03. Install Flow meters.
- R-04. GPS Co-ordinates for waste disposal sites.
- R-05. Sediment and erosion concerns.

R-01. Time-Table for implementation

The timetable for the field program is currently unknown, but as soon as the field program is defined (and no later than 30 days prior to commencement) the NWB and the Kitikmeot Inuit Association (KitIA) will be notified of the proposed activities, locations and timeline.

R-02. GPS Co-ordinates for all water use sources

The seasonal camp will be located at approximately 67°43’12.9” N and 111°23’6.9” W or 483701E/7511726N UTM NAD 83 Zone 12. The proposed camp location was selected as it was previously used by Orofino Resources Ltd. in the late 1980’s. The location is in close proximity to a river, where water will be withdrawn for camp.

The locations of drillsites (and therefore water sources and waste disposal sites) are currently unknown, but as soon as the locations of the drillsites are determined (and no later than 30 days prior to commencement of drilling) the NWB and the KitIA will be notified of the proposed activities, locations and timeline.

R-03. Install Flow meters

Flow meters or other such devices suitable for the measuring of water volumes will be installed and all water use will be recorded and submitted in the Annual Report. Care will be

taken to ensure that water is drawn from bodies with sufficient capacity in order to avoid impact on waterbody level or watercourse flow.

R-04. GPS Co-ordinates for waste disposal sites

The locations of drillsites (and therefore water sources and waste disposal sites) are currently unknown, but as soon as the locations of the drillsites are determined (and no later than 30 days prior to commencement of drilling) the NWB and the KitlA will be notified of the proposed activities, locations and timeline.

Camp greywater will be stored and treated in an excavated sump, which will allow for slow infiltration into the soil and will be located at least 31 m away from a water body. If available, cobbles will be placed in the bottom of the sump to provide filtration and supports will be built on the sides to prevent slumping.

Pacto toilets will be used at the camp. All Pacto bags will be incinerated on site in a batch feed dual-chamber controlled air incinerator. WKG will ensure that the incinerator is a model that is specifically designed to be capable of incinerating this type of waste..

Additional information regarding waste treatment is detailed in the Arcadia Bay Waste Management Plan.

R-05. Sediment and erosion concerns

West Kitikmeot Gold Corp. is firmly committed to the protection and conservation of the natural environment and will develop the Project in an environmentally responsible manner. Environmental practices and procedures which will be implemented at the project will include, but not be limited to:

- Fully comply with all applicable environmental legislation.
- Assess and evaluate any potential environmental impacts as a result of exploration activities, and develop procedures for minimizing or mitigating, as much as is reasonably achievable, the environmental impacts while carrying out these activities.
- The camp, all drillsites and hazardous material storage, including fuel, will be located a minimum distance of 31 metres from the normal high water mark of any water body.
- All hazardous materials, including fuel will be stored in secondary containment.
- Appropriate spill kits, containment and clean up equipment will be present wherever hazardous materials, including fuel will be stored, used or transferred.
- Drill pads will be as small as possible, but that still allow for safe working conditions.
- Biodegradable drill additives will be used whenever possible.
- Recirculation and filtration equipment will be used to minimize the amount of water used and additives released into the environment.
- All drill water waste will be contained in properly excavated sumps or appropriate natural depressions a minimum 31 metres from the normal high water mark of any water body.

- Sumps will be positioned down slope from the drill collar in such a manner that runoff flows into the sump and will not be able to flow into any waterbody.
- If any artesian water flow is detected, the drillhole will be plugged and cemented in bedrock to prevent continued flow. Any artesian water flow will be reported to the NWB and KitlA.

General exploration activities such as geological mapping, prospecting, geochemical sampling and ground geophysical surveys do not cause disturbance to the land, with the exception of soil/till sampling, which requires a small hole to be dug with a shovel in order to extract the sample, but is filled it immediately after the sample is collected. None of the activities proposed at the Arcadia Bay Property are likely to cause severe erosion and sediment build up at the banks of water bodies.

The statement “Areas that have patterned ground, clay-rich soil and or wetlands will be avoided” in section 4.3, paragraph 2, line 6; of the Environmental Management Plan is in reference to the location of camp structures. Camp structures will only be located on appropriate terrain composed of a consolidated and durable surface, such as gravel or sand, which is able to withstand helicopter and camp use.