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NUNAVUT WATER BOARD
NUNAVUT IMALIRIYIN KATIMAYINGI
OFFICE DES EAUX DU NUNAVUT

File: 2BE-ABP1823

September 24, 2021

Brendan Bell
West Kitikmeot Gold Corp.
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Cambridge Bay, NU
X0B 0C0

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APEX Geoscience Ltd.
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Subject: Emergency Response Plan, Environmental Management Plan, Spill Contingency and Fuel Management Plan, Abandonment and Restoration Plan, Waste Management Plan; Type “B” Water Licence No: 2BE-ABP1823, Arcadia Bay Project; West Kitikmeot Gold Corp.

Dear Brendan Bell and Tara Gunson:

The Nunavut Water Board (NWB or Board) received from West Kitikmeot Gold Corp. (WKG or Licensee) on or before July 14, 2021, the following documents (Plans) to fulfill the requirements of Water Licence No: 2BE-ABP1823 (Licence) issued June 19, 2018:

- *Emergency Response Plan* dated June 1, 2017;
- *Environmental Management Plan* dated June 1, 2017;
- *Spill Contingency and Fuel Management Plan* dated April 1, 2021;
- *Abandonment and Restoration Plan* dated April 1, 2021; and
- *Waste Management Plan* dated June 1, 2017.

The NWB distributed the Plans for public review on August 6, 2021. Comments from Crown-Indigenous Relations and Northern Affairs (CIRNA) were received on August 26, 2021. CIRNA included the following information requests:

- Provide the timetable for implementation, highlighting proposed activities, for the submitted Plans;
- Include GPS coordinates for potential flow meter installation locations, as well as the schedule for their installation;
- List the potential waste disposal sites;
- Provide an erosion and sediment mitigation plan for the low-lying areas proximal to drill sites;
- Clarify the following wording in the *Environmental Management Plan*, “(a)reas that have patterned ground, clay-rich soil and or wetlands will be avoided”; and

- Clarify the following wording in the *Environmental Management Plan*, “(e)arth may be required to be moved in order to construct sumps in camp and at drill sites; however natural depressions and areas free of vegetation will be used whenever possible”.

The Licensee responded on September 15, 2021 providing the following clarifications:

- The timetable for the field program is currently unknown, but as soon as the field program is defined (and no later than thirty (30) days prior to commencement) the NWB and the Kitikmeot Inuit Association (KIA) will be notified of the proposed activities, locations and timeline;
- The drilling program is not yet determined. The NWB will be informed at least thirty (30) days prior to commencement of drilling;
- The Licensee committed to installing flowmeters and reporting water withdrawal volumes in annual reports;
- Waste disposal sites are currently not determined; however, the Licensee committed to following its *Waste Management Plan*;
- In regards to erosion and sedimentation prevention measures, the Licensee committed to fulfilling the requirements of the Licence. As the exploration activities planned cause only minor disturbance to the land, severe erosion and sediment build up at the banks of water bodies are unlikely. 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.

The NWB fully reviewed the Plans in the context of the intervener’s comments and recommendations and the Licensee’s clarifications and revisions. Therefore, by way of this correspondence and in accordance with Motion No: 2021-B1-013 and Part B, Items 6 and 8, and Part H, Item 1 of the Licence, the Board approves the following documents:

- *Emergency Response Plan* dated June 1, 2017;
- *Environmental Management Plan* dated June 1, 2017;
- *Spill Contingency and Fuel Management Plan* dated April 1, 2021;
- *Waste Management Plan* dated June 1, 2017.

In addition, the NWB advises that the *Abandonment and Restoration Plan* dated April 1, 2021 addresses the requirements of the Licence. The Licensee is advised that the Plans can be implemented upon the issuance of this letter by the Board.

Should you have any questions, please feel free to contact the undersigned at (867) 360-6338 or assol.kubeisinova@nwb-oen.ca at your earliest convenience.

Sincerely,

Assol Kubeisinova
Technical Advisor

cc: Distribution List - Kitikmeot