Crown-Indigenous Relations and Northern Affairs Canada
Relations Couronne-Autochtones et Affaires du Nord Canada

Water Resources Division
Resource Management Directorate
Nunavut Regional Office
918 Nunavut Drive
Iqaluit, NU, X0A 3H0

Your file - Votre référence
2BE-ANG2227
Our file - Notre référence
GCDocs149222054

August 14, 2026

Robert Hunter
Licensing Administrator
Nunavut Water Board
P.O. Box 119
Gjoa Haven, NU, X0B 1J0
E-mail: licensing@nwb-oen.ca

**Re: Crown-Indigenous Relations and Northern Affairs Canada's Review of the Licence Amendment Renewal Application for the Angilak Project, Type B Water Licence No. 2BE-ANG2227**

Dear Robert,

Thank you for the July 30, 2026 invitation to review the referenced licence 2BE-ANG2227, submitted by 5833 Nunavut Ltd., on behalf of ATHA Energy Corp., for Type B Water Licence No. 2BE-ANG2227.

Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC) examined the application pursuant to its mandated responsibilities under the *Nunavut Waters and Nunavut Surface Rights Tribunal Act* and the *Department of Crown-Indigenous Relations and Northern Affairs Act* and provides the following Technical Review Memorandum for the Board's consideration.

The applicant shall provide confirmation from the Nunavut Water Board that all outstanding water license fees have been paid in full prior to approval of this application.

If there are any questions or concerns, please contact me at (873) 800-5240 or Pauline.Firmin@rcaanc-cirnac.gc.ca or Andrew Keim at (867) 975-4550 or Andrew.Keim@rcaanc-cirnac.gc.ca.

Sincerely,

*Pauline Firmin*

Pauline Firmin, M. Sc,
Regional Coordinator

Canada

# Technical Review Memorandum

**Date:** August 14, 2026

**To:** Robert Hunter – Licensing Administrator, Nunavut Water Board

**From:** Pauline Firmin – Regional Coordinator, CIRNAC

**Subject:** **Crown-Indigenous Relations and Northern Affairs Canada's Review of the Licence Amendment Renewal Application for the Angilak Project, Type B Water Licence No. 2BE-ANG2227**

**Region:** ☐ Kitikmeot ☒ Kivalliq ☐ Qikiqtani

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## A. BACKGROUND

The Angilak Project is an advanced uranium exploration project located in the Kivalliq Region of Nunavut, approximately 225 km southwest of Baker Lake. The project area encompasses mineral claims and subsurface Inuit Owned Lands and has been the focus of uranium exploration activities for more than a decade. Exploration activities have historically been supported from the seasonal Nutaaq Camp, which includes accommodations and an airstrip used to service drilling and field programs.

The current water licence holder and proponent is 5833 Nunavut Ltd., a subsidiary of ATHA Energy Corp., which acquired the project following previous ownership by ValOre Metals Corp. The Angilak Project has been regulated under a series of Nunavut Water Board licences since 2008. Over time, licences have been amended to accommodate activities such as camp relocation, increased drilling programs, fuel storage, trenching, and the establishment of temporary exploration camps. The current licence, 2BE-ANG2227, was issued in April 2022 and expires in April 2027.

ATHA is now seeking a combined amendment and renewal of the licence. The proposed changes are intended to improve exploration efficiency, reduce reliance on helicopter support, enhance worker safety, and reduce greenhouse gas emissions. Key amendments include the construction of a low-profile exploration trail connecting Nutaaq Camp and the Lac 50 deposit area, the extension of the existing airstrip, the addition of camp accommodations for approximately 20 more personnel, the use of fuel storage bladders, and the installation of temporary clear-span bridges at two watercourse crossings. The application states that no increase in licensed water use or waste discharge quantities is being requested.

CIRNAC provides the following comments and recommendations pertaining to the application package. A summary of the subjects of recommendations can be found in Table 1. Documents reviewed as part of this submission can be found in Table 2 of Section B. Detailed technical review comments can be found in Section C.

**Table 1: Summary of Recommendations**

| Recommendation Number | Subject |
|---|---|
| R-01 | Proposed Low-Profile Trail and Water Crossings |
| R-02 | Potentially Acid-Generating Material for Trail Construction |
| R-03 | Water Quality Monitoring Requirements |
| R-04 | Increase in Fuel Storage Volume at Nutaaq Camp |
| R-05 | Spill Management Plan Appendix |

## B. DOCUMENTS REVIEWED AND REFERENCED

The following table (Table 2) provides a list of the documents reviewed under the submission and reference during the review.

**Table 2: Documents Reviewed and Referenced**

| Document Title | Author, File No., Rev., Date |
|---|---|
| Application for Water Licence Amendment – Water Licence 2BE-ANG2227 | 5833 Nunavut Ltd, July 20, 2026 |
| Water Licence 2BE-ANG2227 | Nunavut Water Board, April 12, 2022 |
| Type B Exploration Trail Route, Esker and Material Source Assessment, August 2025 | 2SG Inc., December 12, 2025 |
| Environmental Management Plan | ATHA Energy Corp., December 2025 |
| Spill Contingency Management Plan | ATHA Energy Corp., December 2025 |
| NPC File No. 150928 [Angilak Property] | Nunavut Planning Commission, November 17, 2025 |

## C. RESULTS OF REVIEW

### 1. Proposed Low-Profile Trail and Water Crossings

**Comment:**

CIRNAC notes that the proposed amendment includes the construction and operation of a low-profile exploration trail between the Nutaaq Camp and Lac 50. The supporting documentation identifies a preferred trail route, water crossings and potential material sources, limited information has been provided regarding trail design, construction, operation and maintenance. The *Type B Exploration Trail Route, Esker and Material Source Assessment* recommends that "*detailed design of the exploration trail, design and planning of culverts or timber bridge structures, and material excavation methods and plans be developed in the field prior to construction*." (Section 4). CIRNAC understands that design considerations will need to be adapted to the final route and material chosen and the terrain conditions; however, detailed design information should be made available for review prior to approval of the trail and water-crossing construction.

CIRNAC was unable to identify details relating to trail construction and operation, including but not limited to, consideration of permafrost and terrain stability, drainage design, erosion and sediment control measures, monitoring and maintenance requirements. Without this information, CIRNAC is unable to assess how potential impacts to terrain, vegetation, drainage patterns, and water quality will be avoided or minimized throughout the life of the trail.

In addition, the proposed trail alignment includes stream crossings; however, CIRNAC was unable to identify details, including but not limited to, the crossing design criteria, such as accommodation of seasonal and peak flows, erosion and sediment control measures during construction and operation, protection of riparian areas and aquatic habitat, stream banks stabilization and inspection and maintenance requirements. Consequently, CIRNAC is unable to evaluate how potential effects to water quality, channel stability, and aquatic habitat will be managed during construction and operation of the proposed crossings.

**Recommendation:**

(R-01) CIRNAC recommends that the proponent provide supporting documentation containing details about the proposed trail design, construction, operation, maintenance, such as the measures that will be implemented to manage terrain stability, drainage, erosion, and sedimentation, prior to the commencement of construction activities to support an assessment and mitigation of potential effects on freshwater.

CIRNAC also recommends that the proponent provide supporting documentation containing details about the proposed stream crossings, such as crossing design, such as accommodation of seasonal and peak flows, erosion and sediment control measures during construction and operation, protection of riparian areas and aquatic habitat, stream

banks stabilization, inspection and maintenance requirements, prior to the commencement of any in-water or crossing-related works to support an assessment of potential effects on freshwater.

## 2. Potentially Acid-Generating Material for Trail Construction

**Comment:**

CIRNAC notes that the proponent proposes to use eskers and other potential material sources along the exploration trail route for trail construction. The *Type B Exploration Trail Route, Esker and Material Source Assessment* indicates that additional work is recommended prior to construction, including material source excavation planning, and deeper test pit investigations (Executive Summary; Section 4), since several material sources have been identified as potentially acid generating (PAG) or of uncertain acid-generating potential. According to the assessment, deeper test pits are warranted to confirm the geochemical characteristics and suitability of these sources for construction use (Sections 3.2 and 4).

As the suitability of some material sources has not yet been confirmed, CIRNAC is unclear if the additional investigation of source materials recommended in the assessment have been or will be executed to determine the suitability of the material or if alternatives will be explored to avoid the PAG or uncertain PAG material altogether. Using PAG materials in construction poses a potential risks to groundwater and freshwater bodies.

**Recommendation:**

(R-02) CIRNAC recommends that the proponent clarify whether the recommended follow-up investigations, including deeper test pit sampling and material source characterization, will be completed prior to material extraction and trail construction. If these investigations are not planned, CIRNAC recommends that the proponent clarify how material sources identified as PAG or having uncertain acid-generating potential will be assessed, managed, and excluded from use in trail construction.

## 3. Water Quality Monitoring Requirements

**Comment:**

CIRNAC acknowledges the proponent's initiative to include water quality monitoring related to the proposed trail and watercourse crossings, particularly given that the current licence requirements appear to focus primarily on source water monitoring and ice drilling sites (2BE-ANG2227 Water Licence, part J). The inclusion of trail-related monitoring is a positive measure to support the early identification of potential effects from trail and water crossings construction and operation.

However, the monitoring program appears to be voluntary rather than linked to specific licence requirements or a formal monitoring framework. The Water Quality Report notes that additional sampling locations were added to support evaluation of the proposed trail and crossings, and that there is currently no regulatory requirement prescribing this work (Sections 1.3 and 1.4). The Environmental Management Plan further states that monitoring locations may be added as exploration activities advance (Section 2.1).

It is unclear whether the current monitoring locations will adequately detect potential effects associated with the proposed trail and the two watercourse crossings during both the construction, operation and reclamation phases, or if additional monitoring locations will need to be established once the final route is approved.

**Recommendation:**

(R-03) CIRNAC recommends that water quality monitoring commitments be incorporated into a formal monitoring plan and/or licence requirements and that the proposed monitoring program ensure that any potential effects associated with the construction and operation of the trail and the two watercourse crossings can be adequately identified and assessed. CIRNAC recommends that a formal monitoring framework should be put in place prior to any work relating to construction of trails or water-crossing.

## 4. Increase in Fuel Storage Volume at Nutaaq Camp

**Comment:**

CIRNAC notes that the proposed amendment includes an increase in fuel storage capacity at the main Nutaaq fuel cache from 205,000 L to 615,000 L, representing a threefold increase in the volume of fuel that may be stored at this location (*NPC File No. 150928 [Angilak Property]*, Section 2(e)).

CIRNAC further notes that an increase in fuel storage volume may increase the potential consequences of a spill event. Besides the presence of secondary containment capable of holding 110 percent of the volume of the largest fuel reservoir and back up fuel bladders (*Spill Contingency Management Plan*, Section 4.5), it is unclear whether spill response equipment and resources at the site, such as the quantity of spill kits and/or their content will be revised to account for the increased fuel storage capacity. ¸

It is also unclear whether the increase at the Nutaaq fuel cache will be offset by reductions in fuel storage at other locations on the property. The application does not clearly explain the need for a proportionally larger increase in fuel storage capacity, if total amount of fuel stored at camp is increased (*NPC File No. 150928 [Angilak Property]*, Section 2(e)).

**Recommendation:**
(R-04) CIRNAC recommends that the proponent clarify whether spill response capacity, including the type, quantity, and distribution of spill response equipment and supplies, will be updated to reflect the proposed increase in fuel storage at the Nutaaq fuel cache.

CIRNAC also requests clarification on whether the increased storage capacity at the main Nutaaq fuel cache will replace fuel storage elsewhere on the property or result in an overall increase in the total volume of fuel stored on site. If applicable, CIRNAC requests additional information regarding the operational need for the increased fuel storage capacity at the main Nutaaq fuel cache.

## 5. Spill Management Plan Appendix

**Comment:**
CIRNAC notes that the Spill Contingency Management Plan references Appendix IV (Safety Data Sheets) and Appendix V (Fuel Bladder Design, Layout and Specifications) in the Table of Contents and throughout the document. However, these appendices do not appear to be included. Instead, the document contains wildlife mitigation materials under Appendix V. Specifically, safety data sheets are a crucial component of the SCMP and should be accessible in the same location as the SCMP.

**Recommendation:**
(R-05) CIRNAC recommends that the proponent ensure that Appendix IV (Safety Data Sheets) and Appendix V (Fuel Bladder Design, Layout and Specifications) are present in the Spill Contingency Management Plan and that the Safety Data Sheets are stored in the same accessible area as the Spill Contingency Management Plan on site.