To: Nunavut Water Board
PO Box 119, Gjoa Haven, NU.
X0B 1J0

September 11, 2026

From: Claudia Piche, Regulatory Lead
1240 1066 Hastings St. W
Vancouver. BC, V6E 3X1

# NWB File No. 2BE- ANG2227 – Opportunity to Address Comments Regarding the Angilak Property: Exploration Trail and Camp Upgrades

ATHA appreciates the thoroughness and timely review of our application by the NWB and will continue to work with CIRNAC, the inspector, KIA, intervenors and public representatives through the finalization of management plans prior to construction of the trail and operation of the camp as per the amended and renewed Type B License 2BE- ANG2227.

Due to delays in receiving the renewed CIRNAC land use permit (LUP), ATHA has decided to postpone construction of Phase 1[1] of the exploration trail until 2027. As a result, final engineering including design of the stream crossings, bridges and construction environmental monitoring, erosion and sedimentation controls, will be completed this winter and provided to NWB, CIRNAC and KIA. As a condition of the forthcoming license, we propose to update an Environment Management Plan (currently dated December 2025), 60 days prior to trail construction and submit to the NWB.

In 2026, ATHA continued a successful drilling campaign and conducted geophysical studies that demonstrated promising results in the RIB area, located approximately 35 km west of Nutaaq camp[2]. In accordance with permits and licenses, we are planning to construct a mobile camp with fuel storage near RIB in March 2027.

For brevity, the following is a summary[3] of the intervener and public representative information requests, comments and recommendations, and to support NWB, responses to CIRNAC recommendations are provided by ATHA.

[1] See response to R-01, Phase 1 does not have any stream crossings.
[2] ATHA Energy Reports Widest Intersection to Date at Rib North Discovery with 37 m of Composite Uranium Mineralization in Ribn-DD-003 - Multiple Drillholes Demonstrating Continuity of Uranium Mineralization. https://www.acnnewswire.com/press-release/english/108353/
[3] Full comments and recommendations of intervenor and public comments are posted on the NWB portal.

# Responses to CIRNAC Comments and Recommendations – GCDoc 149222054

**CIRNAC #R-01: Proposed Low Profile Trail and Water Crossings**

*CIRNAC recommends the proponent:*

- *Provide supporting documentation containing details about the proposed trail design, construction operation and maintenance, which has the measures that will be implemented to manage stability, drainage, erosion and sedimentation prior to the construction activities; and*
- *Provide supporting documentation containing details about the proposed stream crossings, such as design, sediment and erosion control measures during construction.*

Response: ATHA has provided a description of the trail construction in ATHA's NIRB Screening Document Section 2.2 – Location and Siting Criteria and Section 2.3 – Exploration Trail Construction Plan. In the summer 2025, ATHA completed field studies to inform route selection and collect preliminary environmental data in support of trail construction.

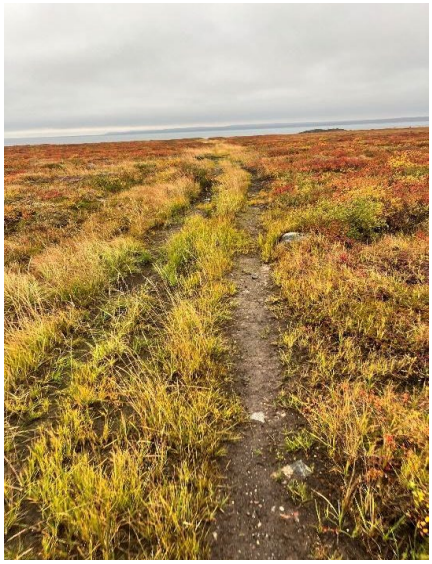
- General characteristics of the exploration trail (refer to the below figures) include:
- Narrow, low-profile 1.5m wide trail intended for light off-road vehicles (ATVs, Side-by-sides, etc.).
- Field fit with proposed route mainly along a natural height of land.
- No cut-and-fill required except some fill and timber bridges in low, wetted, or steep areas.
- Where required, granular fill to be sourced from eskers along the trail route.
- Bridges not required except for at crossings C1-2 and W4 (designs will be provided to NWB 60 days prior to construction.

**Examples of existing low-profile trails and a timber bridge at Nutaaq Camp (August 2025)**











**Other examples of low-profile exploration access trails in the Kivalliq (September 2024)**

The construction of the trail has been delayed in 2026 and is expected to begin in summer 2027 and be completed by October 2029. This timeframe will allow for flexibility in construction with equipment and resources available on-site. Construction will occur in two phases, starting at camp and working westward. During this time, exploration work will continue under existing permits and be accessed by helicopter. Key concepts of the construction approach include:

- Field-fit alignment flagged on foot
- Minimal vegetation disturbance
- Granular placement only where required
- Use of small equipment (side by side, skid steer, small loader)
- No blasting, no major cuts, no borrow pits beyond the eskers identified along the trail.

**Phase 1: 2027 – 2028 (to Lac 50 Area)**

Construction begins at Nutaaq Camp, extending north and west from the existing 601 m trail segment. There is no stream crossings planned in 2027.

- Crown Land section (Segment A–B):
    - Length: 2,979 m
    - Multiple nearby material sources available to support fill where required.
- IOL section (Segment B–C):
    - Length: 5,544 m
    - With a 1,433 m spur road to Lac 50 drilling targets
    - Esker 1, Esker 2 and Esker 3 are viable material sources for this section of the proposed trail.

**Phase 2: 2028 – 2029 Segment D → E**

Phase 2 of trail construction will occur in summer 2028.

- Segment length: 9,580 m, entirely on IOL lands
- Includes two stream crossings, each requiring installation of clear-span timber bridges.
- Esker 3 remains the primary granular source for any fill required along this segment.

We trust this construction plan is sufficient at this stage of the project. ATHA commits to providing an updated Environmental Management Plan 60 days prior to construction that will have a new section "Construction Environmental Monitoring Plan for Trail Construction". As there are no stream crossings in Phase 1, in approximately Q2 2028, ATHA will provide stream crossing plans and/or bridge drawings to the NWB 60 days prior to the start of Phase 2 construction.

**CIRNAC #R-02: Potentially Acid Generating Material for Trail Construction**

*CIRNAC recommends the proponent:*

- *Clarify whether the recommended follow-up investigations, including deeper test pit sampling and material source characterization will be completed prior to the material extraction and trail construction.*

Response: Yes. ATHA completed additional deeper test pit sampling at Esker 1, 2 MS and near the camp in June 2026 in support of finalizing our construction plan. The exact locations of those deeper test pits are below:

| **TRAIL** | **YEAR** | **ID** | **SAMPLE ID** | **GPS LOCATION** | |
|---|---|---|---|---|---|
| **ESKER 1 MS** | 2026 | TEMS 1 | TEMS 1-1 | 62.594533 | -98.511249 |
| | | | TEMS 1-2 | 63.594593 | -98.510587 |
| | | | TEMS 1-3 | 64.594659 | -98.509042 |
| **ESKER 2 MS** | 2026 | TEMS 2 | TEMS 2-1 | 62.595018 | -98.521753 |
| | | | TEMS 2-2 | 62.594593 | -98.521708 |
| | | | TEMS 2-3 | 62.594677 | - 98.521259 |
| **CAMP** | | | | | |
| **NORTH AIRSTRIP 1** | 2026 | ASN1 | ASN1-1 | 62.576702 | -98.462372 |
| | | | ASN1-2 | 62.576682 | -98.462673 |
| | | | ASN1-3 | 62.576941 | -98.462608 |
| **NORTH AIRSTRIP 2** | 2026 | ASN2 | ASN2-1 | 62.575696 | -98.462308 |
| | | | ASN2-2 | 62.575952 | -98.462464 |
| | | | ASN2-3 | 62.576152 | -98.462233 |

The results will be used to confirm NPAG material sources for trail construction and will be provided to NWB, and as a condition of the KIA Lease, to the KIA 60 days prior to construction along with a final construction plan including bridge drawings.

**CIRNAC #R-03: Water Quality Monitoring Requirements**

*CIRNAC recommends that:*

- *Water quality monitoring commitments be incorporated into a formal monitoring plan and/or license requirements and that the proposed monitoring program ensure that any potential effects associated with the construction and operation of the trail and two water course crossings can be adequately identified and assessed.*

Response: As per our CIRNAC R-01 response, ATHA commits to providing an updated Environmental Management Plan that will have a new section "Construction Environmental Monitoring Plan for Trail Construction". This plan will be provided to NWB, 60 days prior to construction and will address CIRNAC recommendations. In approximately Q2 2028, along with bridge drawings, it will be further updated for review by NWB with operational monitoring requirements at stream crossings, including annual visual inspections for stability, erosion and ensure environmental protection/ mitigation.

**CIRNAC #R-04: Increase in Fuel Storage Volume at Nutaaq Camp**

*CIRNAC recommends:*

- *The proponent clarifies whether spill response capacity including 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.*
- *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.*

Response:

ATHA refers CIRNAC and the Nunavut Water Board (NWB) to Appendix A of the March 22, 2012, NIRB Screening Decision, which considered the use of up to 820,000 L of fuel on the Angilak Property[4] .

Consistent with the recent NPC Project Description, ATHA plans to store up to 615,000 L of fuel at the Nutaaq Camp. Given the successful and promising results of RIB exploration drilling in 2026, ATHA is also planning to support mobile camp activities in the RIB area through the storage of up to an additional 205,000 L of fuel. This would result in a total planned fuel storage capacity of up to

[4] Page 16 of 24, Appendix A of NIRB Screening Decision for Kivalliq Energy Corporations Amendment request with AANDC for its "Angilak" project, Additional Application Terms and Conditions, 08EN052. AANDC File No N2008C0026. Dated March 22, 2012.

820,000 L, consistent with the fuel volume previously considered in the NIRB screening for the operation of 5 drills at Angilak.

We have updated the attached updated Spill Contingency Management Plan (SCMP) for the Angilak Property to reflect the proposed fuel storage and associated management measures at both the mobile camp (near RIB) and Nutaaq camp.

In 2027, we propose to store up to 500,000L of jet A and diesel in bladders at Nutaaq camp, along with fuel drums, that are remaining from the 2026 campaign. Additionally, we plan to store up to 1 x 125,000L Jet A bladder and 1 x 125,000L diesel bladder in 110% secondary containment, at a suitable temporary mobile camp near RIB (which is approximately 35 km from Nutaaq camp). Details, purchasing and logistics of fuel transportation to the mobile camp will be finalized in the next few months. We have included updated schematics of the bladder storage, which are designed with 110% secondary containment.

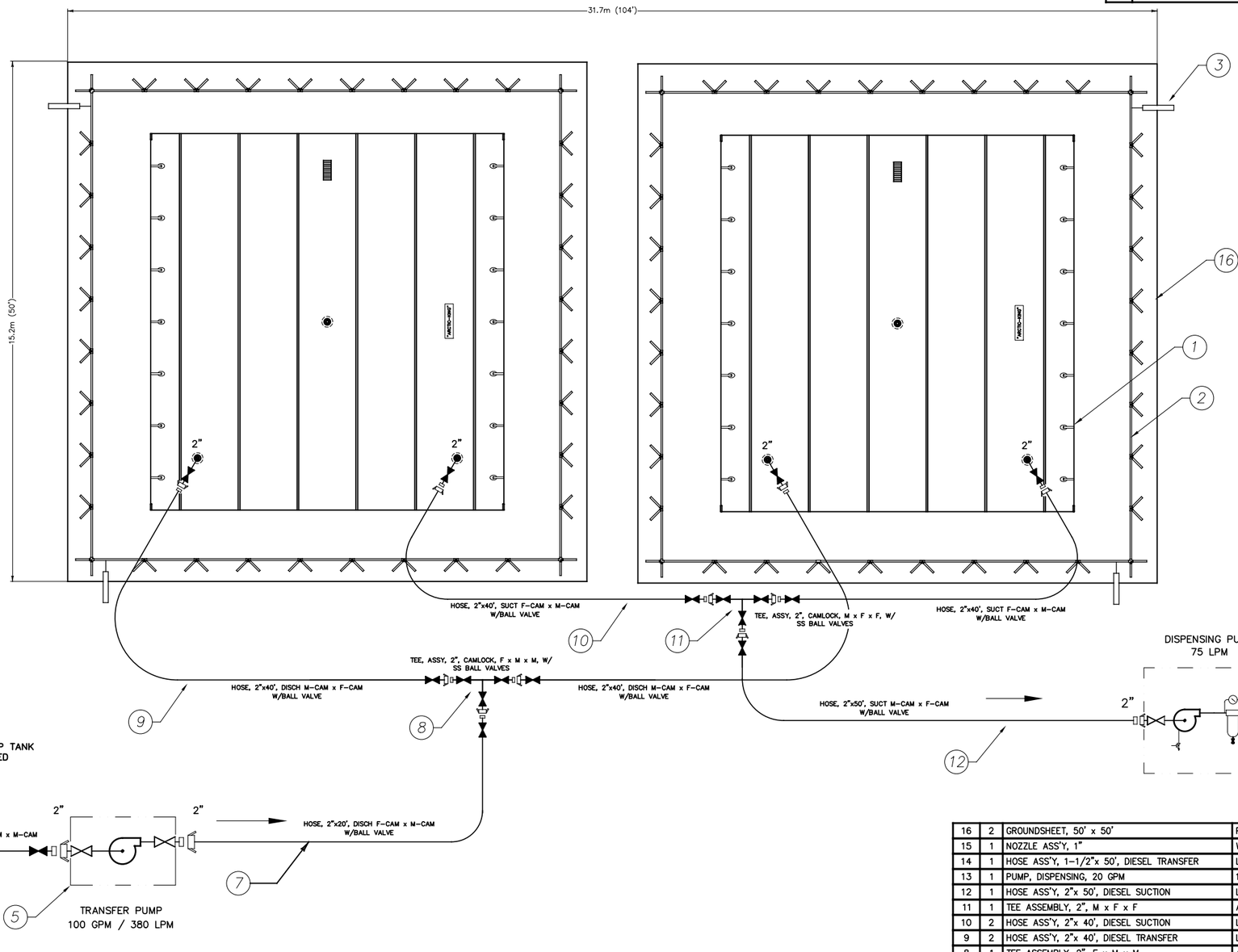
In using bladders, all fuel will be purchased in the Kivalliq region; furthermore, bladders will lower the drum recycling and associated waste backhauling. Lastly, as a reminder, bladder fuel will be consumed during the field season; bladders no longer containing fuel will be collapsed and rolled up for the winter. We look to NWB and CIRNAC for acceptance of this fuel volume at both the mobile and Nutaaq camp sites as outlined in the updated and attached SCMP, dated August 2026.

**CIRNAC R-05: Spill Management Plan Appendix**

*Recommendation: CIRNAC recommends that the proponent ensure that Appendix IV and Appendix V are present in the Spill Contingency Management Plan and that the Safety Data Sheets are stored in the same area as the SCMP on site.*

Response: ATHA agrees with this recommendation.

| REV | REVISION DESCRIPTION | BY | DATE | APPV |
|---|---|---|---|---|
| P1 | PRELIMINARY | GB | 24.12.11 | – |
| P2 | HOSE LENGTHS AND QTY REVISED PER CUSTOMER REQUEST | MJ | 25.07.04 | – |




PRELIMINARY
DO NOT USE FOR CONSTRUCTION

# DIESEL

| PART | QTY | DESCRIPTION | MATERIAL | ITEM/BOM_No. | U/M | T.QTY |
|---|---|---|---|---|---|---|
| 16 | 2 | GROUNDSHEET, 50' x 50' | POLYETHYLENE | 014945 | EA | 2 |
| 15 | 1 | NOZZLE ASS'Y, 1" | W/SWIVEL AND CAMLOCK | – | EA | 1 |
| 14 | 1 | HOSE ASS'Y, 1–1/2"x 50', DIESEL TRANSFER | LT, M–CAM x F–CAM | – | EA | 1 |
| 13 | 1 | PUMP, DISPENSING, 20 GPM | 120VAC, FILTER AND METER | – | EA | 1 |
| 12 | 1 | HOSE ASS'Y, 2"x 50', DIESEL SUCTION | LT, M–CAM x F–CAM W/SS BALL VALVE | – | EA | 1 |
| 11 | 1 | TEE ASSEMBLY, 2", M x F x F | AL. W/SS BALL VALVES | – | EA | 1 |
| 10 | 2 | HOSE ASS'Y, 2"x 40', DIESEL SUCTION | LT, M–CAM x F–CAM W/SS BALL VALVE | – | EA | 2 |
| 9 | 2 | HOSE ASS'Y, 2"x 40', DIESEL TRANSFER | LT, F–CAM x M–CAM W/SS BALL VALVE | – | EA | 2 |
| 8 | 1 | TEE ASSEMBLY, 2", F x M x M | AL. W/SS BALL VALVES | – | EA | 1 |
| 7 | 1 | HOSE ASS'Y, 2"x 50', DIESEL TRANSFER | LT, F–CAM x M–CAM W/SS BALL VALVE | – | EA | 1 |
| 6 | 1 | HOSE ASS'Y, 2"x 100', DIESEL TRANSFER | LT, F–CAM x M–CAM W/SS BALL VALVE | – | EA | 1 |
| 5 | 2 | PUMP, TRANSFER | DIESEL ENGINE DRIVE | 014612 | EA | 2 |
| 4 | 2 | HOSE ASS'Y, 2"x 20', DIESEL SUCTION | LT, FITTINGS TBD | – | EA | 2 |
| 3 | 4 | HYDROCARBON FILTER | RAIN DRAIN | 014654 | EA | 4 |
| 2 | 2 | FRAME BERM, 45'x 45'x 32" | ARCTIC SHIELD HD | 008170 | EA | 2 |
| 1 | 2 | TANK, 125,000L | ARCTIC KING | 014661B | EA | 2 |

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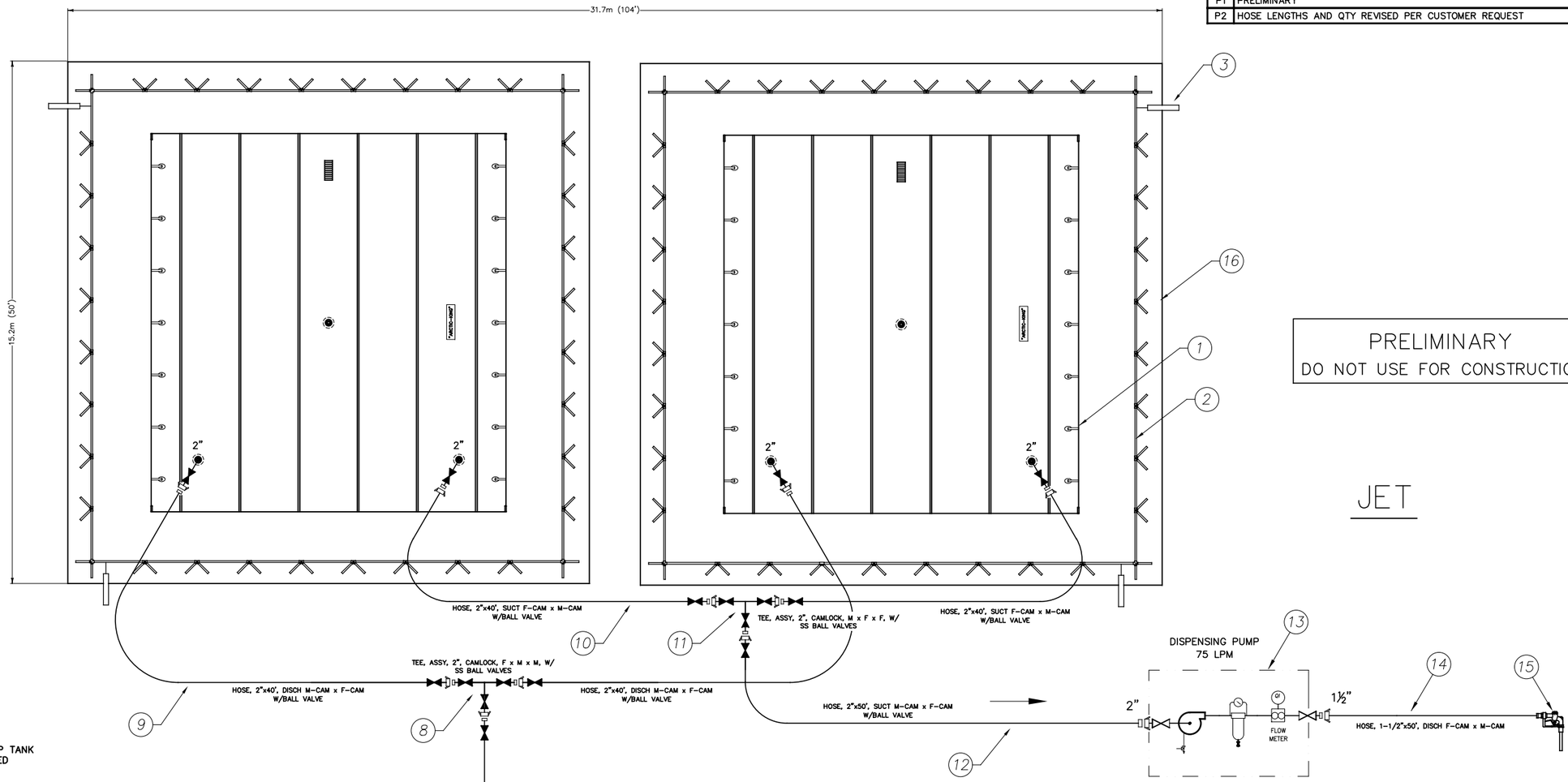
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TOLERANCES: ∠ ± 2° .X = ± .030 .XX = ± .020 .XXX = ± .005

| DRAWN | DATE (YY.MM.DD) |
|---|---|
| GB | 25.06.12 |
| APPROVED | DATE (YY.MM.DD) |
| – | – |

TITLE: LAYOUT, DIESEL TANK FARM
NUTAAQ CAMP, ANGILAK PROJECT
ATHA ENERGY CORP.

| WEIGHT (LBS) | SIZE | SCALE | ITEM/BOM NO. | DRAWING. No. | REV. | SHEET |
|---|---|---|---|---|---|---|
| – | B | NTS | – | TT–D–579 D | P2 | 1/1 |

| REV | REVISION DESCRIPTION | BY | DATE | APPV |
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| P1 | PRELIMINARY | GB | 24.12.11 | – |
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PRELIMINARY
DO NOT USE FOR CONSTRUCTION

JET

| PART | QTY | DESCRIPTION | MATERIAL | ITEM/BOM_No. | U/M | T.QTY |
|---|---|---|---|---|---|---|
| 16 | 2 | GROUNDSHEET, 50' x 50' | POLYETHYLENE | 014945 | EA | 2 |
| 15 | 1 | NOZZLE ASS'Y, 1" | W/SWIVEL AND CAMLOCK | – | EA | 1 |
| 14 | 1 | HOSE ASS'Y, 1–1/2"x 50', AVIATION DISCHARGE | EI 1529 TYPE E, M–CAM x F–CAM | – | EA | 1 |
| 13 | 1 | PUMP, DISPENSING, 20 GPM | 120VAC, FILTER AND METER | – | EA | 1 |
| 12 | 1 | HOSE ASS'Y, 2"x 50', AVIATION SUCTION | EI 1529 TYPE E, M–CAM x F–CAM W/SS BALL VALVE | – | EA | 1 |
| 11 | 1 | TEE ASSEMBLY, 2", M x F x F | AL. W/SS BALL VALVES | – | EA | 1 |
| 10 | 2 | HOSE ASS'Y, 2"x 40', AVIATION SUCTION | EI 1529 TYPE E, M–CAM x F–CAM W/SS BALL VALVE | – | EA | 2 |
| 9 | 2 | HOSE ASS'Y, 2"x 40', AVIATION DISCHARGE | EI 1529 TYPE C F–CAM x M–CAM W/SS BALL VALVE | – | EA | 2 |
| 8 | 1 | TEE ASSEMBLY, 2", F x M x M | AL. W/SS BALL VALVES | – | EA | 1 |
| 7 | 1 | HOSE ASS'Y, 2"x 50', AVIATION DISCHARGE | EI 1529 TYPE C, F–CAM x M–CAM W/SS BALL VALVE | – | EA | 1 |
| 6 | 1 | HOSE ASS'Y, 2"x 100', AVIATION DISCHARGE | EI 1529 TYPE C, F–CAM x M–CAM W/SS BALL VALVE | – | EA | 1 |
| 5 | 2 | PUMP, TRANSFER | DIESEL ENGINE DRIVE | 014612 | EA | 2 |
| 4 | 2 | HOSE ASS'Y, 2"x 20', AVIATION SUCTION | EI 1529 TYPE E, FITTINGS TBD | – | EA | 2 |
| 3 | 4 | HYDROCARBON FILTER | RAIN DRAIN | 014654 | EA | 4 |
| 2 | 2 | FRAME BERM, 45'x 45'x 32" | ARCTIC SHIELD HD | 008170 | EA | 2 |
| 1 | 2 | TANK, 125,000L | ARCTIC KING | 014661B | EA | 2 |

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TITLE
LAYOUT, JET FUEL TANK FARM
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