

**DE BEERS GROUP**

April 14, 2023

Robert Hunter  
Licensing Administrator  
Nunavut Water Board  
P.O. Box 119  
Gjoa Haven, NU X0B 1J0

Attn: Robert Hunter,

**Re: 2BE-CHI1823 – DeBeers – Chidliak Exploration Project – Type B Water Licence Renewal Amendment**

Please see the attached Table 1 response to comments generated from interested parties regarding Water Licence Renewal No: 2BE-CHI1823. The complete response package also includes updated attachments:

- Chidliak Exploration Project Waste Management Plan Ver.1.1,
- Chidliak Exploration Project Bulk Sample Monitoring Plan Ver. 1.1,
- Chidliak Exploration Project Abandonment and Restoration Plan Ver. 1.1, and
- The Chidliak Exploration Project Spill Contingency Plan Ver. 1.1.

If you have any questions or comments about these responses, or would like to meet with us to discuss, please contact me by telephone or email at [Chad.corson@debeersgroup.com](mailto:Chad.corson@debeersgroup.com) or 249-377-4445.

Sincerely,



Chad Corson  
Permitting Coordinator  
De Beers Canada Inc.

**De Beers Canada inc.**

1601 Airport Road NE Suite 300 Calgary Alberta T2E 6Z8  
Tel + 1 403 930 0991 | [www.debeersgroup.com/canada](http://www.debeersgroup.com/canada) | [info.canada@debeersgroup.com](mailto:info.canada@debeersgroup.com)  
Incorporated in Canada | Registration number 889569596

A member of the Anglo American plc group

# DE BEERS GROUP

**Table 1 – De Beers Response to Comments Water License Renewal 2BE-CHI1823**

Reviewer	Document /Date	Reference Document	Comment/Recommendation	De Beers Response
Environment and Climate Change Canada (ECCC) Environmental Protection Operations Directorate Prairie & Northern Region	Letter dated April 3, 2023 addressed to the Nunavut Water Board Robert Hunter, Licensing Administrator. RE: 2BE-CHI1823 - Type B Water Licence Renewal Amendment	Chidliak Exploration Project Waste Management Plan Rev.1.0; Section 3, Table 3-1 (DeBeers; December 2022)	1. In the case of a spill or emergency, the 24 Hour Northwest Territories/Nunavut Spill Report Line should be contacted first by the Proponent, who will then involve ECCC Emergencies when appropriate. The proponent has correctly listed the spill line but has attributed the wrong agency as the contact. ECCC Recommendation(s) Please update the external contact for the 24h spill line to the Government of Nunavut.	Table 3.1 of the Spill Contingency Plan and Table 2 of the Waste Management have been updated to list the Government of Nunavut as the external contact for the 24 hour spill reporting line.
Environment and Climate Change Canada (ECCC) Environmental Protection Operations Directorate Prairie & Northern Region	Letter dated April 3, 2023 addressed to the Nunavut Water Board Robert Hunter, Licensing Administrator. RE: 2BE-CHI1823 - Type B Water Licence Renewal Amendment	Bulk Sample Monitoring Plan – Chidliak Exploration Project (DeBeers; March 2023)	2. Sections 2.1 (Trenching) and 2.2.2 (Cuttings Disposal) of the plan indicate that any water present at trench locations will be tested in the summer season following completion of trenching activities. However, no details were given on sampling, analysis, and disposal of trench water. Additional information should be provided to support a better understanding of water testing and water management. ECCC Recommendation(s) ECCC recommends that the Bulk Sample Monitoring Plan be updated to provide details (e.g., sampling and analysis) regarding the planned water testing which is mentioned in Sections 2.1 (Trenching) and 2.2.2 (Cuttings Disposal) of the plan. The plan should also describe water management, including options to manage any water that does not meet water licence discharge requirements.	We acknowledge that the Bulk Sample Monitoring Plan will require updates to identify specific water management and discharge locations prior to implementation of a bulk sampling program. De Beers is currently in the early planning stage for taking a Bulk Sample in 2024. Once details are determined changes may require us to update the Bulk Sample Monitoring Plan with further details regarding the sample location and monitoring program. Should changes be required the updated plan would be provided to NWB in advance of the 90 day minimum timeframe.  Updates have been made however to address reviewer comments, including adding a Section 3: Environmental Considerations, with updates to Section 2.1 (Trenching) and 2.2.2 (Cuttings Disposal).  Trenching is not expected to be a component of the Bulk Sample program tentatively scheduled

## DE BEERS GROUP

Reviewer	Document /Date	Reference Document	Comment/Recommendation	De Beers Response
				for the winter of 2024. If it is determined trenching will be required, an update to this document will be provided. Such an update would include consideration for mitigation measures to prevent the transport of sediments, blasting residuals, and other contaminants from trench areas to nearby waterbodies. It will also include plans for a water quality sampling analysis of trench water during the summer months.
Environment and Climate Change Canada (ECCC) Environmental Protection Operations Directorate Prairie & Northern Region	Letter dated April 3, 2023 addressed to the Nunavut Water Board Robert Hunter, Licensing Administrator. RE: 2BE-CHI1823 - Type B Water Licence Renewal Amendment	Bulk Sample Monitoring Plan – Chidliak Exploration Project (DeBeers; March 2023)	3. Part D (Conditions Applying to Waste Disposal), Item 10 of the water licence requires testing be conducted to confirm that bulk sampling waste rock is free of contaminants and is non-acid generating and non-metal leaching, prior to disposal. Relevant testing information should be provided in the Bulk Sample Monitoring Plan. ECCC Recommendation(s) ECCC recommends that the Bulk Sample Monitoring Plan be updated to describe how bulk sampling waste rock is tested to determine whether it is free of contaminants and is non-acid generating and non-metal leaching, in alignment with Part D (Conditions Applying to Waste Disposal), Item 10 of the water licence. The plan should also discuss options to manage any waste rock that does not meet the requirements of Part D, Item 10.	Section 3.2 has been added to describe measures to address contaminants including potentially acid generating or metal leaching country rock.

## DE BEERS GROUP

Reviewer	Document /Date	Reference Document	Comment/Recommendation	De Beers Response
Environment and Climate Change Canada (ECCC) Environmental Protection Operations Directorate Prairie & Northern Region	Letter dated April 3, 2023 addressed to the Nunavut Water Board Robert Hunter, Licensing Administrator. RE: 2BE-CHI1823 - Type B Water Licence Renewal Amendment	Bulk Sample Monitoring Plan – Chidliak Exploration Project (DeBeers; March 2023)	4. The Bulk Sample Monitoring Plan does not include any descriptions of the mitigation measures that will be used to protect the aquatic environment during Bulk Sampling. Mitigation measures should be included and described in the plan to guide employees and contractors while carrying out sampling activities. ECCC Recommendation(s) ECCC recommends that the Bulk Sample Monitoring Plan provide information regarding mitigation measures that will be used to prevent the transport of sediments, blasting residuals and other contaminants from trench areas to nearby waterbodies.	De Beers will not be taking a bulk sample in 2023. Bulk sampling will be done in the winter when ground conditions frozen. The next bulk sample is planned for the winter 2024. There will be no water flow during the sampling season. Trenching is not currently being considered. The sampling areas are isolated on land with the exception of CH-44 which is 175 meters from the nearest stream. CH-44 is not in the current 2024 planning for Bulk Sampling. Large diameter drilling includes bagging all the cuttings and sends the sample off site for processing. Section 3 Environmental Consideration, Section 3.3 Mitigation Measures, and Section 3.1 Water Testing have been added.
Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC). Water Resources Division, Resource Management Directorate	Letter dated March 31, 2023 addressed to the Nunavut Water Board, Robert Hunter, Licensing Administrator. RE: Crown-Indigenous Relations and Northern Affairs Canada's Review of the License Amendment Application for Chidliak Project, Type B Water License No. 2BE-CHI1823	Chidliak Exploration Project Waste Management Plan	A) It is unclear if all waste is removed from site(s) at the end of seasonal camp closures and during final closure.	Section 4.5 Seasonal Camp Closure has been added to the Chidliak Exploration Project Waste Management Plan Ver 1.1. In addition, Section 1.4.2 and 1.4.3 of the Abandonment and Restoration Plan Ver. 1.1 has been updated to indicate that hazardous waste will be shipped off-site to a designated waste handler.

# DE BEERS GROUP

Reviewer	Document /Date	Reference Document	Comment/Recommendation	De Beers Response
Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC). Water Resources Division, Resource Management Directorate	Letter dated March 31, 2023 addressed to the Nunavut Water Board, Robert Hunter, Licensing Administrator. RE: Crown-Indigenous Relations and Northern Affairs Canada's Review of the License Amendment Application for Chidliak Project, Type B Water License No. 2BE-CHI1824	Chidliak Exploration Project Waste Management Plan	B) It is unclear how the building will be burned on site during the final camp closure. Note that CIRNAC does not recommend open burning.	<p>Please note that the documents contained describe activities for the Chidliak Exploration Project and there are few buildings which are constructed of wood that remain. Since De Beers acquisition, exploration buildings have been constructed of aluminum/steel and canvas.</p> <p>Section 3.5 of the Waste Management Plan refers to the Chidliak Project Restoration and Abandonment Plan when dealing with demolition wood waste. Section 1.4.3 of the Chidliak Exploration Project Abandonment and Restoration Plan describes the final closure plans for buildings. The section has been modified to include the CIRNAC recommendations to indicate that all buildings on site are temporary in construction and most are canvas lined and will be disassembled and shipped off-site. Wood buildings and floors can be disassembled, cutup, and either burned on site, provided to interested parties, or transported to Iqaluit. If practical, prior to site abandonment, burning of such wood at Discovery Camp will consider burning in open drums or used as stock in the incinerator. Otherwise burning will occur in a contained pile. Any Chidliak Project camp burning should not occur within 31 meters of the perceived high-water mark of a waterbody, and consideration taken to avoid disturbing wildlife or vegetation. In Iqaluit the shipped materials will be sold, disposed of in the Iqaluit landfill, or placed in containers and shipped south. Any nails or metal bits remaining will be collected by hand using magnets.</p> <p>Disruption at the Peregrine legacy camps of Aurora and Sunrise has been minimized since De Beers acquisition. CH-6 camp buildings are canvas and contain very little wood. Although</p>

# DE BEERS GROUP

Reviewer	Document /Date	Reference Document	Comment/Recommendation	De Beers Response
				we support the CIRNAC recommendation it may be necessary to burn wood from buildings at these sites to decrease unintended environmental impacts from shipping wood to Iqaluit. The concern is that the Introduction of unintended fixed wing aircraft, unnecessary travel over land to transport wood, increased helicopter slinging, increased noise disturbance, and fuel consumption for the purposes of wood removal would increase disturbance in the area as opposed to open air burning.
Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC). Water Resources Division, Resource Management Directorate	Letter dated March 31, 2023 addressed to the Nunavut Water Board, Robert Hunter, Licensing Administrator. RE: Crown-Indigenous Relations and Northern Affairs Canada's Review of the License Amendment Application for Chidliak Project, Type B Water License No. 2BE-CHI1824	Chidliak Exploration Project Waste Management Plan	C) It is unclear how and where all waste types are being stored.	Section 3.6 Waste Storage has been added to provide details regarding waste storage and containment at the Chidliak Project site.
Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC). Water Resources Division, Resource	Letter dated March 31, 2023 addressed to the Nunavut Water Board, Robert Hunter, Licensing Administrator. RE: Crown-Indigenous Relations and	Chidliak Exploration Project Waste Management Plan	D) It is unclear when the waste will be transported off site(s) to appropriate waste	Section 2 has been updated to indicate that waste removal from site will be ongoing throughout the project season and will occur as often as flights and weather permit. Hazardous waste removal is prioritized, and Camp Closure activities will be in accordance with section 1.4.2 and 1.4.3 of the Abandonment and Restoration Plan.

# DE BEERS GROUP

Reviewer	Document /Date	Reference Document	Comment/Recommendation	De Beers Response
Management Directorate	Northern Affairs Canada's Review of the License Amendment Application for Chidliak Project, Type B Water License No. 2BE-CHI1825			
Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC). Water Resources Division, Resource Management Directorate	Letter dated March 31, 2023 addressed to the Nunavut Water Board, Robert Hunter, Licensing Administrator. RE: Crown-Indigenous Relations and Northern Affairs Canada's Review of the License Amendment Application for Chidliak Project, Type B Water License No. 2BE-CHI1826	Chidliak Exploration Project Waste Management Plan	E) Is it unclear what the final disposition of the drill core and drill cutting will be.	Section 3.3.3 has been updated to specify that drill cuttings whether RC or core are collected and brought to approved cutting deposition locations. These locations were selected by engineers and approved in previous permit applications. Section 3.3.3 of the Waste Management Plan provides locations of these sites. The drill rig system is built to contain the separation of the clean cuttings (relict material from the raw sample) coming out of the bored hole into a catch-all tyvex (mega-bag). The bag is hung within a containment box where the process begins receiving the cuttings coming out of the large diameter (LDDH) RC or core hole. The cuttings are comprised of drill chips and fine crushed material <1mm which will be disposed of in an approved Cuttings Containment Area depression (water in the closed-loop drill circuit recirculates). The mega-bags are removed prior to final disposal.
Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC). Water Resources Division, Resource Management Directorate	Letter dated March 31, 2023 addressed to the Nunavut Water Board, Robert Hunter, Licensing Administrator. RE: Crown-Indigenous Relations and Northern Affairs Canada's Review	Chidliak Exploration Project Waste Management Plan	F) Is it unclear what the final disposition of RC Core or drill cuttings will be.	See response above.

## DE BEERS GROUP

Reviewer	Document /Date	Reference Document	Comment/Recommendation	De Beers Response
	of the License Amendment Application for Chidliak Project, Type B Water License No. 2BE-CHI1827			
Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC). Water Resources Division, Resource Management Directorate	Letter dated March 31, 2023 addressed to the Nunavut Water Board, Robert Hunter, Licensing Administrator. RE: Crown-Indigenous Relations and Northern Affairs Canada's Review of the License Amendment Application for Chidliak Project, Type B Water License No. 2BE-CHI1828	Chidliak Exploration Project Waste Management Plan	G) It is unclear when large diameter drill cuttings will be transported to one of the three cuttings containment areas and how they will be stored prior to their transportation.	<p>Section 3.3.1 and Section 3.3.3 have been updated to specify that cuttings will be taken to the approved disposal areas while they are being generated.</p> <p>Section 3.3 Mitigation Measures has been added to the Bulk Sample Monitoring Plan Ver. 1.1 to clarify that Movement of the cuttings from the drill to the cuttings deposition area will occur during the winter months to minimize environmental impacts. Cuttings should not be stockpiled at the Drill location and transported to the containment area once the bag is full. A set predetermined travel route will be designated to travel between the two areas. Equipment approved under the current land use permit such as a Morooka tracked carrier Picker, will be used to transport the cuttings. Prior to transport the equipment operator should ensure their load is secure in consideration for the environment and health and safety. Operations staff will monitor the Cuttings Deposition Area during the drill shift to ensure the cuttings mega-bags are properly contained and that no leakage has occurred away from the Cuttings Deposition Area.</p>



## DE BEERS GROUP

Reviewer	Document /Date	Reference Document	Comment/Recommendation	De Beers Response
Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC). Water Resources Division, Resource Management Directorate	Letter dated March 31, 2023 addressed to the Nunavut Water Board, Robert Hunter, Licensing Administrator. RE: Crown-Indigenous Relations and Northern Affairs Canada's Review of the License Amendment Application for Chidliak Project, Type B Water License No. 2BE-CHI1829	Chidliak Exploration Project Waste Management Plan	H) It is unclear where grey water will be released.	Section 3.4.1 of the Waste management Plan has been updated to indicate that grey water at the Discovery Camp has been released into a low lying area (i.e sump) at the South-west corner of the camp since the camps initial construction as authorized by the Inspector.
Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC). Water Resources Division, Resource Management Directorate	Letter dated March 31, 2023 addressed to the Nunavut Water Board, Robert Hunter, Licensing Administrator. RE: Crown-Indigenous Relations and Northern Affairs Canada's Review of the License Amendment Application for Chidliak Project, Type B Water License No. 2BE-CHI1830	Chidliak Exploration Project Waste Management Plan	I) The waste management plan should include a plan for all waste types including, wood waste within its plan.	The site is an exploration site and does not generate much waste. Wood waste is mentioned in Section 3.5, and the newly added Section 4.5 of the Waste Management Plan Ver. 1.1. Wood waste is also discussed in detail in the Abandonment and restoration plan Ver. 1.1. Small woody debris will be incinerated. Large untreated woody debris will be piled and burned.

# DE BEERS GROUP

Reviewer	Document /Date	Reference Document	Comment/Recommendation	De Beers Response
Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC). Water Resources Division, Resource Management Directorate	Letter dated March 31, 2023 addressed to the Nunavut Water Board, Robert Hunter, Licensing Administrator. RE: Crown-Indigenous Relations and Northern Affairs Canada's Review of the License Amendment Application for Chidliak Project, Type B Water License No. 2BE-CHI1831	Chidliak Exploration Project Waste Management Plan	J) It is unclear how and where waste is stored before and after waste has been processed through the incinerator.	Section 4.1 of the Waste Management Plan has been updated to clarify that domestic waste is incinerated as it is generated. Empty fuel drums are de-headed, decanted, and aerated. The drums are then covered and used to store incinerator ash. Incinerator ash once collected is sent to Nunatta Environmental Services (Waste Handler #NUR-300002) for testing and disposal.
Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC). Water Resources Division, Resource Management Directorate	Letter dated March 31, 2023 addressed to the Nunavut Water Board, Robert Hunter, Licensing Administrator. RE: Crown-Indigenous Relations and Northern Affairs Canada's Review of the License Amendment Application for Chidliak Project, Type B Water License No. 2BE-CHI1832	Chidliak Exploration Project Waste Management Plan	K) It is unclear if the incinerator is a double chamber incinerator.	The following has been added to section 4.1 Incineration of the Waste Management Plan Ver. 2.0: "The Model A400X incinerator has a 14' gauge aluminized steel jacket and is refractory lined. It consists of a lower Main Chamber with an upper Secondary Chamber."

# DE BEERS GROUP

Reviewer	Document /Date	Reference Document	Comment/Recommendation	De Beers Response
Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC). Water Resources Division, Resource Management Directorate	Letter dated March 31, 2023 addressed to the Nunavut Water Board, Robert Hunter, Licensing Administrator. RE: Crown-Indigenous Relations and Northern Affairs Canada's Review of the License Amendment Application for Chidliak Project, Type B Water License No. 2BE-CHI1833	Chidliak Exploration Project Spill Contingency Plan	L) The Spill Plan states that used fuel drums will be used for large spills clean up operations (section 4.2). It is unclear how and where are those drums stored while awaiting final disposition.	Sections 4.1.2 of the Spill Plan Ver. 1.1 has been updated to include details on drum storage.
Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC). Water Resources Division, Resource Management Directorate	Letter dated March 31, 2023 addressed to the Nunavut Water Board, Robert Hunter, Licensing Administrator. RE: Crown-Indigenous Relations and Northern Affairs Canada's Review of the License Amendment Application for Chidliak Project, Type B Water License No. 2BE-CHI1834	Chidliak Exploration Project Waste Management Plan	M) It is unclear if there will always be a supply of used fuel drums at the camp(s).	Fuel is continuously being consumed at camp and there are typically used fuel drums produced daily. The large spill kit drums themselves can also be marked and hold materials. We do not intend to stockpile empty drums.
Crown-Indigenous Relations and	Letter dated March 31, 2023 addressed to the	Chidliak Exploration Project	N) It is unclear how often the used fuel drums will be removed from camp(s). These are all concerns as it is unclear how	Empty fuel drums are repurposed to eliminate waste and environmental impact from bringing in other shipping containers or storage vessels.

## DE BEERS GROUP

Reviewer	Document /Date	Reference Document	Comment/Recommendation	De Beers Response
Northern Affairs Canada (CIRNAC). Water Resources Division, Resource Management Directorate	Nunavut Water Board, Robert Hunter, Licensing Administrator. RE: Crown-Indigenous Relations and Northern Affairs Canada's Review of the License Amendment Application for Chidliak Project, Type B Water License No. 2BE-CHI1835	Waste Management Plan	waste is going to be managed. This can lead to waste making its way into water bodies.	There is no intention to stockpile empty fuel drums, they are treated as hazardous waste unless de-headed, wiped clean, aerated, and repurposed to be used as containment for items awaiting shipment off-site (example. Incinerator ash). The main hazardous waste items are empty fuel drums. Section 2 of the Chidliak Exploration Project Waste Management Plan Ver. 1.1 has been updated to indicate that waste removal from site will be ongoing throughout the project season and will occur as often as flights and weather permit. Hazardous waste removal is prioritized and camp closure activities will be in accordance with section 1.4.2 and 1.4.3 of the Abandonment and Restoration Plan.
Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC). Water Resources Division, Resource Management Directorate	Letter dated March 31, 2023 addressed to the Nunavut Water Board, Robert Hunter, Licensing Administrator. RE: Crown-Indigenous Relations and Northern Affairs Canada's Review of the License Amendment Application for Chidliak Project, Type B Water License No. 2BE-CHI1836	Chidliak Exploration Project Abandonment and Restoration Plan	A) The reclamation of the gravel runaway was not mentioned in the Abandonment and Restoration Plan.	Section 1.4.3 of the Chidliak Exploration Project, Abandonment and Restoration Plan has been updated to clarify that the Discovery Camp runway is natural with no construction and consists of gravel and cobbles. The runway will be inspected for any contaminants or debris, and rutting will be loosely contoured.

# DE BEERS GROUP

Reviewer	Document /Date	Reference Document	Comment/Recommendation	De Beers Response
Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC). Water Resources Division, Resource Management Directorate	Letter dated March 31, 2023 addressed to the Nunavut Water Board, Robert Hunter, Licensing Administrator. RE: Crown-Indigenous Relations and Northern Affairs Canada's Review of the License Amendment Application for Chidliak Project, Type B Water License No. 2BE-CHI1837	Chidliak Exploration Project Abandonment and Restoration Plan	B) It is unclear how sumps will be reclaimed at final closure.	Section 1.4.4 has been updated to clarify that drill sumps will be inspected at final closure. Where necessary, sumps will be backfilled; if this is not possible due to snow cover and frozen ground, then any sumps requiring backfill will be filled in summer conditions. Section 1.4.3 has been updated to indicate that the greywater system, which would consist of plastic pipe to greywater sumps when in operation, which receive water from the camp kitchen and dry buildings, will be drained, dismantled and removed off-site for disposal or recycled to another project. The sump and immediate environment will be examined, any remaining debris removed, the sump will be backfilled and levelled, and remaining bagged materials transported off-site for disposal.
Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC). Water Resources Division, Resource Management Directorate	Letter dated March 31, 2023 addressed to the Nunavut Water Board, Robert Hunter, Licensing Administrator. RE: Crown-Indigenous Relations and Northern Affairs Canada's Review of the License Amendment Application for Chidliak Project, Type B Water License No. 2BE-CHI1838	Chidliak Exploration Project Abandonment and Restoration Plan	C) It is unclear if the site(s) will be inspected after final closure.	Section 1.4.3 Final Camp Closure Specifies "A site inspection with the assigned land use Inspector will be completed at the conclusion of operations. Any concerns issued by the Inspector will be dealt with to the satisfaction of the Inspector". The term "Final" and "final camp closure" has been added to this statement to clarify. The statement now reads; "A final site inspection with the assigned land use Inspector and/or CIRNAC's Land Use Engineer will be completed at the conclusion of final camp closure operations. Any concerns issued by the Inspector or Engineer will be dealt with to their satisfaction." Further inspections, following completion of any actions requested by the Inspector are not anticipated.

## DE BEERS GROUP

Reviewer	Document /Date	Reference Document	Comment/Recommendation	De Beers Response
Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC). Water Resources Division, Resource Management Directorate	Letter dated March 31, 2023 addressed to the Nunavut Water Board, Robert Hunter, Licensing Administrator. RE: Crown-Indigenous Relations and Northern Affairs Canada's Review of the License Amendment Application for Chidliak Project, Type B Water License No. 2BE-CHI1839	Chidliak Exploration Project Abandonment and Restoration Plan	D) It is unclear how the trenches will be refilled after their use and what material will be used to refill them	Section 1.4.4 has been updated to indicate that trenches will be refilled with excavated material at the completion of the drill program. The material that is put back in the hole is generally of greater volume than the hole. In the summer the material settles and forms a hollow. The hollow will not be filled as that would necessitate creating an additional hole at another destination to obtain the material.
Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC). Water Resources Division, Resource Management Directorate	Letter dated March 31, 2023 addressed to the Nunavut Water Board, Robert Hunter, Licensing Administrator. RE: Crown-Indigenous Relations and Northern Affairs Canada's Review of the License Amendment Application for Chidliak Project, Type B Water License No. 2BE-CHI1840	Chidliak Exploration Project Spill Contingency Plan	A) It is unclear if a spill kit will be located near hazardous waste and hazardous materials storage location(s).	A spill kit will be located near the hazardous waste and hazardous materials storage locations. This has been clarified in Section 4.2. and 4.1.2.

# DE BEERS GROUP

Reviewer	Document /Date	Reference Document	Comment/Recommendation	De Beers Response
Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC). Water Resources Division, Resource Management Directorate	Letter dated March 31, 2023 addressed to the Nunavut Water Board, Robert Hunter, Licensing Administrator. RE: Crown-Indigenous Relations and Northern Affairs Canada's Review of the License Amendment Application for Chidliak Project, Type B Water License No. 2BE-CHI1841	Chidliak Exploration Project Spill Contingency Plan	B) The section on spills on land (section 4.3.4.1) is not fully explained. There is no mention of how the product will be removed from the land, where the hazardous materials will be stored or how they will be stored until they are removed from site.	Further detail has been added to both Sections 4.2 and 4.2.4.1 to address each of the items raised by the reviewer.
Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC). Water Resources Division, Resource Management Directorate	Letter dated March 31, 2023 addressed to the Nunavut Water Board, Robert Hunter, Licensing Administrator. RE: Crown-Indigenous Relations and Northern Affairs Canada's Review of the License Amendment Application for Chidliak Project, Type B Water License No. 2BE-CHI1842	Chidliak Exploration Project Spill Contingency Plan	C) It is unclear if burning is the preferred method of removing hazardous materials.	Hazardous waste will be shipped off site. Incineration is for non-hazardous waste only. Burning of hydrocarbons at the site of a spill is not the preferred method, however it may be a viable option to remove the contaminant if the spill occurs on water or snow. If burning is to be proposed, De Beers would consult with regulators prior to implementation as described in section 4.2.4.4

## DE BEERS GROUP

Reviewer	Document /Date	Reference Document	Comment/Recommendation	De Beers Response
Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC). Water Resources Division, Resource Management Directorate	Letter dated March 31, 2023 addressed to the Nunavut Water Board, Robert Hunter, Licensing Administrator. RE: Crown-Indigenous Relations and Northern Affairs Canada's Review of the License Amendment Application for Chidliak Project, Type B Water License No. 2BE-CHI1843	Chidliak Exploration Project Spill Contingency Plan	D) The section on spills on Muskeg (section 4.3.4.2) is not fully explained. There is no mention of how the spill will be removed from the Muskeg environment, where the hazardous materials will be stored or how they will be stored until they are removed from site.	Further detail has been added to both Sections 4.1 and 4.2.4.2 to address each of the items raised by the reviewer. Note that Section 4.1 articulates the actions that will be taken for all spills, inclusive of muskeg environments while Section 4.2.4.2 describes the special considerations for muskeg environments.



## DE BEERS GROUP

Reviewer	Document /Date	Reference Document	Comment/Recommendation	De Beers Response
Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC). Water Resources Division, Resource Management Directorate	Letter dated March 31, 2023 addressed to the Nunavut Water Board, Robert Hunter, Licensing Administrator. RE: Crown-Indigenous Relations and Northern Affairs Canada's Review of the License Amendment Application for Chidliak Project, Type B Water License No. 2BE-CHI1844	Chidliak Exploration Project Spill Contingency Plan	E) The section on spills on water (section 4.3.4.3) is not fully explained. There is no mention of how the spill will be removed from the water, where the hazardous materials will be stored or how they will be stored until they are removed from site.	Section 4.2.4.3 has been updated to provide further detail on spill clean up, hazardous waste storage and removal.
Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC). Water Resources Division, Resource Management Directorate	Letter dated March 31, 2023 addressed to the Nunavut Water Board, Robert Hunter, Licensing Administrator. RE: Crown-Indigenous Relations and Northern Affairs Canada's Review of the License Amendment Application for Chidliak Project,	Chidliak Exploration Project Spill Contingency Plan	F) The figures (4.3, 4.4 and 4.5) are not explained.	These figures have been referenced in text. Additional text has been added to section 4.2.4.3 to explain how the figures describe potential containment options to reduce the flow of water and contain the downstream spread of potential contaminants

## DE BEERS GROUP

Reviewer	Document /Date	Reference Document	Comment/Recommendation	De Beers Response
	Type B Water License No. 2BE-CHI1845			
Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC). Water Resources Division, Resource Management Directorate	Letter dated March 31, 2023 addressed to the Nunavut Water Board, Robert Hunter, Licensing Administrator. RE: Crown-Indigenous Relations and Northern Affairs Canada's Review of the License Amendment Application for Chidliak Project, Type B Water License No. 2BE-CHI1846	Chidliak Exploration Project Spill Contingency Plan	G) Figure 4.7 title suggests that it should be under the spills on water section however it was placed under the section for ice and snow. Confirm if that figure is in the correct section and then explain the figure.	The format of the document was organized into a containment section and recovery section. Figure 4.7 was part of the recovery section and the figure is explained in the text below. With the new changes the section has been moved to the water section to avoid confusion. The diagram is now Figure 4.6

## DE BEERS GROUP

Reviewer	Document /Date	Reference Document	Comment/Recommendation	De Beers Response
Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC). Water Resources Division, Resource Management Directorate	Letter dated March 31, 2023 addressed to the Nunavut Water Board, Robert Hunter, Licensing Administrator. RE: Crown-Indigenous Relations and Northern Affairs Canada's Review of the License Amendment Application for Chidliak Project, Type B Water License No. 2BE-CHI1847	Chidliak Exploration Project Spill Contingency Plan	H) The section on ice and snow (section 4.3.4.4) only states that it will be setting fire to the contaminants. There are no other clean up options are discussed.	Section 4.3.4.4 has been updated with further detail on the various methods that may be utilized for clean-up on ice and snow. Burning is not the preferred option.
Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC). Water Resources Division, Resource Management Directorate	Letter dated March 31, 2023 addressed to the Nunavut Water Board, Robert Hunter, Licensing Administrator. RE: Crown-Indigenous Relations and Northern Affairs Canada's Review of the License Amendment Application for Chidliak Project, Type B Water License No. 2BE-CHI1848	Chidliak Exploration Project Spill Contingency Plan	I) Please include all MSDS for all hazardous materials that will be used during this project. MSDS contain important information of how to clean up spills. This is a concern because if spills are not properly cleaned up it can lead to deleterious substances in the water bodies.	SDS Sheets have been updated and are available on the De Beers sharepoint server. Additionally they are on memory drive and will be taken to the project site in case of internet issues. The most commonly used items with perceived higher risk and volumes are included in Appendix C of the Waste Management Plan. Provided is a link to the Box drive that can be used by regulators or personnel on site to access SDS sheets. There are 56 Chemicals listed in Appendix B and we also may hold duplicates depending upon manufacturers.