



Water Resources Division
Resource Management Directorate
Nunavut Regional Office
P.O. Box 100
Iqaluit, NU, X0A 0H0

Your file - Votre référence
2BE-COP1721
Our file - Notre référence
GCdocs # 97399016

August 31, 2021

Mr. Richard Dwyer
Manager of Licensing
Nunavut Water Board
P.O. Box 119
Gjoa Haven, NU, X0B 1J0
sent via e-mail: licensing@nwb-oen.ca

**Re: Crown-Indigenous Relations and Northern Affairs Canada's Comment on
Tundra Copper Corp. Application for Renewal of Type B Water Licence No.
2BE-COP1721**

Dear Mr. Dwyer,

Thank you for your August 12, 2021 invitation to review the Type B water licence 2BE-COP1721 renewal application, submitted by the Tundra Copper Corp. on May 10, 2021.

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*. Please find CIRNAC comments and recommendations in the attached Technical Memorandum.

CIRNAC appreciates the opportunity to participate in this review. If there are any questions, please contact me at (867) 975-4738 or vincent.okonkwo@canada.ca

Sincerely,

Vincent Okonkwo
Environmental Assessment Coordinator



Technical Review Memorandum

Date: August 31, 2021

To: Richard Dwyer, Manager of Licensing, Nunavut Water Board

From: Vincent Okonkwo, Environmental Assessment Coordinator, CIRNAC

**Subject: Crown-Indigenous Relations and Northern Affairs Canada's Comment on
Tundra Copper Corp. Application for Renewal of Type B Water Licence
No. 2BE-COP1721**

Region: ☒ Kitikmeot ☐ Kivalliq ☐ Qikiqtani

A. BACKGROUND

Nunavut Water Board (NWB), on August 12, 2021, provided notification of an application for renewal of Tundra Copper Corp.'s Type B Water Licence 2BE-COP1721 for their Coppermine project mineral exploration. The Coppermine project is located approximately sixty (60) Kilometers southwest of Kugluktuk in the Kitikmeot region of Nunavut in both Crown Land administered by CIRNAC and Inuit Owned Land (IOL) administered by the Kitikmeot Inuit Association (KIA).

Project activities include exploration for copper mineralization using geochemical soil and rock sampling surveys, prospecting, 2,000 meters of core diamond drilling in five holes, 500 meters of trenching to evaluate and verify previously discovered copper deposits, and geological mappings.

Tundra Copper Corp. has requested to renew their Type B water licence till July 20, 2026 to keep it in good standing for future planned exploration across their Coppermine claims.

CIRNAC Provides the following comments and recommendations pertaining to the Type B Water Licence 2BE-COP1721 application for renewal submitted May 10, 2021.



Table 1: Summary of Recommendations

Recommendation Number	Subject
R-01	Misrepresentation of allowable daily Water Quantity
R-02	Quality and Capacity of Water Sources
R-03	2019 Annual Report
R-04	Existing Water Licence Expiry Date
R-05	Management Plans

B. RESULTS OF REVIEW

1. Misrepresentation of Allowable Daily Water Quantity

Comment

Part C, Item 1 terms and condition of the Type B Water Licence 2BE-COP1721 states that:

“The Licensee shall obtain all water for domestic camp use from local source(s) as outlined in the Application. Total camp Water use shall not exceed five (5) cubic metres per day. Drill water shall be obtained from source(s), proximal to the drilling targets as outlined in the Application and shall not exceed sixty-five (65) cubic metres per day. The total volume of water allowed for all purposes under this Licence shall not exceed seventy (70) cubic metres per day.”

In the 2017, 2018 and 2020 Annual Reports, the licensee stated the allowable daily limit for drilling water and domestic use as 70 m³ and 5 m³ respectively, thereby misrepresenting the total volume of water allowed for all purposes as 75 m³ per day. This quantity is in contrast the 70 m³ total volume of daily water use for all purposes permissible in the licence.

CIRNAC is of the opinion that the licensee double check the quantity reported in these annual reports to conform with the quantity permitted in the licence.

Recommendation

(R-01) CIRNAC recommends that the licensee:

- Clarify the reported 70 m³ as allowable daily limits for drilling water in 2017, 2018 and 2020 Annual Reports; where as Part C, Item 1 condition of Water Licence 2BE-COP1721 states 65 m³.



2. Quality and Capacity of Water Sources

Comment

In Item 13 of the application for water licence renewal document, the licensee was asked to describe the quality of the water source(s) and available capacity(s).

Licensee in its response stated that:

“company personnel have not been able to determine water quality but it is presumed to be potable.” The Licensee further stated that: *“The capacity is likely sufficient for drilling.”*

CIRNAC is of the opinion that the answer provided above by the licensee is not satisfactory as it was based on presumption and did not provide details of water quality or capacity of the reference water source.

Baseline information on quality and quantity of water sources where water will be drawn for all purposes is a vital information to the regulators as it provides a benchmark to users and helps to understand the extent of the impact to the water body at the end of the project.

Recommendation

(R-02) CIRNAC recommends that the licensee provide baseline information on:

- Water Quality for all sources where water will be withdrawn ; and
- Water Quantity/Capacity for all sources where water will be withdrawn .

3. 2019 Annual Report

Comment

There is no history of 2019 Annual Report. It is unclear if 2019 Annual Report was provided by the licensee. Annual report is an important document as it reports all the activities of the licensee in the referenced fiscal year.

The Licensee is obliged to submit Annual Reports irrespective of not completing any work or activities in the year in question.

It helps regulators monitor the activities of the licensee in relation to the terms and conditions of the NWB license.



Recommendation

(R-03) CIRNAC recommends that licensee clarify if 2019 Annual Report was submitted to the Nunavut Water Board or not

4. Existing Water Licence Expiry Date

Comment

In Item 25, of the application for the amendment document, the licensee stated July 21, 2021 as the existing water licence expiry date. This date conflicts the June 18, 2021, expiry date written on the existing Type B Water Licence 2BE-COP1721.

This inconsistency in expiry dates will create a void between the existing licence and the issue date of the new licence and bring confusion to the regulators records.

Recommendation

(R-04) CIRNAC recommends that the licensee:

- Update their application document to include the correct expiry date of the existing licence June 18, 2021; and
- Amend the requested issuance and expiry dates to read June 20, 2021 and June 20, 2026 respectively.

5. Management Plans

Comment

The licensee mentioned that there is no planned exploration program in the near future, that they intend to keep the water licence in good standing. Although, Licensee did not mention the number of people that will eventually be involved if the project kicks off in the future and there is no provision of management plans that will ensure reduction of impact to the water bodies.

Abandonment and Reclamation Plan was provided during the 2016 renewal but was not provided at this time, unless there is no update to the plan.

CIRNAC is of the opinion that the licence make these management plans readily available when they intend to start up the exploration project.

The following management plans were not provided with the application:

- Waste Management Plan
- Fuel Management Plan
- Environmental Management Plan



Recommendation

(R-05) CIRNAC recommends that the Licensee:

- Provides the following management plans:
 - i. Waste Management Plan;
 - ii. Fuel Management Plan; and
 - iii. Environmental Management Plan.
- Clarify if the Abandonment and Reclamation Plan provided during 2016 renewal is updated.

C. REFERENCES

Department of Crown-Indigenous Relations and Northern Affairs Act. (2020).

Nunavut Waters and Nunavut Surface Rights Tribunal Act. (2016).

Nunavut Water Board, June 19, 2017: Type B Water Licence No: 2BE-COP1721 Pg. 1, 6 and 7.