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June 30, 2026

Richard Dwyer
Manager of Licensing
Nunavut Water Board
P.O. Box 119
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Dear Richard Dwyer,

Tundra Copper Corp., Coppermine River Project – Water Licence Amendment Application, Type B Water Licence No. 2BE-COP2429 – CIRNAC and DFO Comments

Dahrouge Geological Consulting Ltd., on behalf of Tundra Copper Corp. (“Tundra” or the “Applicant”), has reviewed the comments provided in response to the Amendment Application for the Coppermine River Project, Type B Water Licence No. 2BE-COP2429. Comments were received from William Quere, Regional Coordinator, Water Resources Division, Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC), dated June 5, 2026, and Anna-Maija LaFlamme, Triage/RRU Biologist, Fish and Fish Habitat Protection Program, Fisheries and Oceans Canada (DFO), dated June 5, 2026.

The Applicant appreciates the time and effort dedicated by these agencies and individuals in reviewing the proposed Project activities and providing their comments. Responses are provided below.

CIRNAC Comment Responses:

1. R-01 Incineration and Open Burning

Comment:

The Waste Management Plan states in Section 4.2 (Incinerator) that “All combustible waste will be incinerated per federal, territorial regulations, and Nunavut’s guidelines”. CIRNAC noted there was no description of incinerator capacity or specialized nature as mentioned in Section 2.2 of the plan, and no procedure included for incinerator use. CIRNAC further noted that Open Burning is cited in the Abandonment and Restoration Plan with no mention in the Waste Management Plan, and with no procedure, ash management, or burning area information provided.

Recommendation:

(R-01) CIRNAC recommended that the incinerator description and procedure for use be added to the Waste Management Plan, as well as all Open Burning procedures.

Tundra Response:

The Waste Management Plan has been updated to address this recommendation. The following additions have been made:

Section 2.2 (Waste Sources Table) has been updated to identify the two (2) Elastec SmartAsh cyclonic barrel burner incinerators to be deployed at camp, specifying Unit 1 for general dry combustible waste and Unit 2 with OilAway attachment for food and wet waste.

Section 4.2 (Incinerator) has been updated to include: (a) a full description of the incinerator units, including unit type, burn rate (~22 kg/hr per unit), drum format, and estimated daily capacity of 175–220 kg across both units, which is assessed as sufficient for up to 50 personnel; (b) a six-step SmartAsh operating procedure covering pre-operation inspection, loading rules, ignition, operational monitoring, ash removal, and recordkeeping; and (c) a note that a small dual-chamber controlled-air incinerator may be substituted subject to availability and regulatory approval, in accordance with the Environmental Guideline for the Burning and Incineration of Solid Waste (Government of Nunavut) and the Canada-Wide Standards for Dioxins and Furans (CCME).

A new Section 4.4 (Open Burning) has been added to the Waste Management Plan. This section describes open burning as a last-resort method during site abandonment and restoration activities only, consistent with the Abandonment and Restoration Plan. The section includes: designated burning area requirements and setbacks (minimum 100 m from structures and fuel storage, 31 m from water bodies, 30 m from dry vegetation); pre-burn authorization requirements; permitted and prohibited materials; fire control requirements; extinguishment procedures; ash management (collection in sealed 205 L drums, storage in the hazardous waste storage area, and backhaul to an approved facility); and a burn recordkeeping requirement.

2. R-02 New Camp Water Source

Comment:

CIRNAC noted that the General Application (Section 13) references a potential pump relocation to a stream-fed lake 700 m from camp to meet expanded camp water needs, but that no further information was provided for this new water source as required by Part C of Water Licence No. 2BE-COP2429.

Recommendation:

(R-02) CIRNAC recommended the Applicant provide additional information for the new water source including transportation, sedimentation and erosion controls, and any other descriptions or characteristics relevant to Part C of the current licence.

Tundra Response:

A supplementary technical letter addressing the proposed new camp water source has been submitted concurrently with this response to comments, addressed to the Manager of Licensing, Nunavut Water Board. The letter provides the following information in respect of Part C of Licence No. 2BE-COP2429:

Water Source Identification: The proposed source is an unnamed, stream-fed lake located approximately 700 m north of camp at UTM Zone 11N: 522843 mE, 7480550 mN. This lake is the nearest perennial water body to camp and is considered a local source proximal to the camp for the purposes of Part C, Item 1. The previous camp water source was a small seasonal water body adjacent to camp that may be insufficient to meet the expanded camp's water requirements.

Camp Water Volume: Camp water use under the proposed amendment is limited to 10 m³/day. The remaining authorized volume (289 m³/day) is allocated entirely to drilling operations and is obtained from sources proximal to drilling targets. At 10 m³/day, withdrawal from a stream-fed lake is not anticipated to result in drawdown, and the Part C, Item 4 notification threshold is not triggered.

Intake Design: A submersible pump mounted on a float will be deployed on the water body surface. No work will be conducted below the ordinary high-water mark (Part C, Item 6). The intake hose will be equipped with an end-of-pipe fish screen installed in accordance with the DFO Freshwater Intake End-of-

Pipe Fish Screen Guidelines and DFO's Interim Code of Practice: End-of-Pipe Fish Protection Screens for Small Water Intakes in Freshwater (Part C, Item 5), consistent with the approach used by the Applicant in the 2025 field season.

Transportation: Water will be conveyed to camp via a surface hose line approximately 700 m in length. No trenching or subsurface disturbance will occur.

Erosion and Sediment Controls: The float-mounted pump will not contact or disturb lake banks or bed sediments. The hose line will be routed on the ground surface away from drainage features. No bank disturbance will occur. Sediment and erosion controls will be implemented prior to and maintained during all water withdrawal activities (Part C, Items 7 and 8).

Low Flow Compliance: The withdrawal rate of 10 m³/day (~0.000116 m³/s) from a stream-fed lake is considered negligible and well within the 10% low flow threshold of Part C, Item 3.

DFO Comment Response:

1. Fish and Fish Habitat – Water Withdrawal Activities

Comment:

DFO reviewed the Coppermine River Drilling Program Water Licence Amendment, file number 2BE-COP2429, noting that the water withdrawal activities described have the potential to impact fish and fish habitat through entrainment and impingement. DFO recommended that the Applicant: (a) follow DFO's protective measures for fish and fish habitat and standard codes of practice; (b) respect the Nunavut in-water works restricted activity timing windows to protect fish during spawning and incubation periods; (c) refer to DFO's Interim Code of Practice: End-of-Pipe Fish Protection Screens for Small Water Intakes in Freshwater when using fish screens where intake flow is up to 0.150 m³/s; and (d) complete and submit a site-specific review request if the proposal meets the relevant criteria. DFO also reminded the Applicant of its duty to notify DFO in the event of fish death or harmful alteration, disruption, or destruction of fish habitat.

Tundra Response:

Tundra appreciates the comments provided by DFO. DFO's requirements for the protection of fish and fish habitat have been incorporated into Tundra's management plans and procedures, and Tundra will continue to operate within these requirements for the duration of the Project.

Closure:

The Applicant trusts that the information and clarifications provided in this response, together with the updated Waste Management Plan and the concurrently submitted supplementary water source letter, are sufficient to address all outstanding CIRNAC and DFO comments. Please do not hesitate to contact the undersigned if additional information is required.

Yours sincerely,

Allyson Ullrich

Dahrouge Geological Consulting Ltd.

On behalf of Tundra Copper Corp.

cc: Richard Dwyer, Manager of Licensing, Nunavut Water Board (licensing@nwb-oen.ca)
William Quere, CIRNAC (william.quere@rcaanc-cirnac.gc.ca)
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