



Water Resources Division  
Resource Management Directorate  
Nunavut Regional Office  
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Your file - Votre référence  
2BE-CPM2527  
Our file - Notre référence  
144521166

March 23, 2026

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

**Re: Crown-Indigenous Relations and Northern Affairs Canada's Review of the  
Licence Amendment Application for Coppermine Project, Type B Water Licence  
No. 2BE-CPM2527**

Dear Robert,

Thank you for the March 02, 2026 invitation to review the referenced licence amendment, submitted by Lockett Consultation Services Inc. on behalf of 1501253 B.C. Ltd. (Somerset Minerals Ltd), for Type B Water Licence No. 2BE-CPM2527.

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](mailto:Pauline.Firmin@rcaanc-cirnac.gc.ca) or Andrew Keim at (867) 975-4550 or [Andrew.Keim@rcaanc-cirnac.gc.ca](mailto:Andrew.Keim@rcaanc-cirnac.gc.ca).

Sincerely,

*Pauline Firmin*

Pauline Firmin, M. Sc,  
Water Management Coordinator

## Technical Review Memorandum

**Date:** March 23, 2026

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

**From:** Pauline Firmin – Water Management Coordinator, CIRNAC

**Subject: Crown-Indigenous Relations and Northern Affairs Canada’s Review of the Licence Amendment Application for Coppermine Project, Type B Water Licence No. 2BE-CPM2527**

**Region:**     Kitikmeot     Kivalliq     Qikiqtani

### **A. BACKGROUND**

The Coppermine Project is located approximately 60 km southwest of the community of Kugluktuk, within the Kitikmeot Region of Nunavut. The project area covers 1,665 km<sup>2</sup> of prospective copper and silver-bearing geology within the Copper Creek Formation basalts.

The proponent, 1501253 B.C. Ltd. (operating as Somerset Minerals Ltd.), has applied to amend Water Licence 2BE-CPM2527 to allow establishment of two temporary exploration camps, up to 100 additional drillholes, and water use increases. The proposed program includes diamond drilling, reverse-circulation drilling, geophysics, sampling, and prospecting, using helicopter and fixed wing airplane support as well as land-based transportation.

The amendment application proposes a maximum total daily water use of up to 299 m<sup>3</sup>/day, from the allowed maximum total daily water use of 20 m<sup>3</sup>/day under the current licence, although the proponent notes typical use will be significantly lower. Withdrawals will be sourced from nearby lakes and streams using screened intakes, with lakes limited to 0.10 m seasonal drawdown and streams to ≤10% of instantaneous low flow. The use of two temporary camps is planned at Inuit Owned Land parcel CO 58 (Jura) and on Crown Land near the Hope Lake airstrip. Greywater will be discharged into constructed or natural sumps located more than 31 m from the ordinary high-water mark, and sewage will be managed through sealed containment systems or incinerating toilets with off-site disposal. The licence expiry date of April 13, 2027 will not be changed.

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                  | Basis for Lake Withdrawal Limit Methodology.   |
| R-02                  | Clarification on equipment and infrastructure used for water withdrawal.                           |
| R-03                  | Inconsistency Of Requested Water Use Volumes.  |
| R-04                  | Basis for Wastewater Volume Estimates.   |
| R-05                  | Confusion about the Camp Population Used To Determine Water Use and Waste Estimates.               |
| R-06                  | Clarification on the establishment of Winter Tracks/Ice Road.                                      |
| R-07                  | Missing Spill-response measures in case of fuel transfer or spill during transport.                |
| R-08                  | Inconsistency In Incineration Practices Across Submitted documentation.                            |
| R-09                  | Legacy Use of Camp Areas and Potential Existing Liabilities.                                       |
| R-10                  | Confirmation Whether The Exploration/Remote Questionnaire Submitted Is The Intended Final Version. |
| R-11                  | Missing Attachment Number for Wildlife Management Plan in the Application document.                |
| R-12                  | Inconsistent Camp Identification in Map 5 Description.   |
| R-13                  | Missing date In The Application For Water Licence Amendment Document.                              |

**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              | 1501253 B.C. Ltd (Somerset Minerals Ltd), April 2013          |
| Spill and Fuel Management Plan                       | 1501253 B.C. Ltd (Somerset Minerals Ltd), V1, October 2, 2025 |
| Waste Management Plan                                | 1501253 B.C. Ltd (Somerset Minerals Ltd), September 4, 2025   |
| Appendix A   | Unknown, no date  |
| Closure and Reclamation Plan                         | 1501253 B.C. Ltd (Somerset Minerals Ltd), September 4, 2025   |
| Exploration/ remote camp Supplementary questionnaire | Unknown, no date  |
| NWB Water Licence No: 2BE-CPM2527                    | Nunavut Water Board, April 14, 2025                           |

## C. RESULTS OF REVIEW

### 1. Basis for Lake Withdrawal Limit Methodology.

#### **Comment:**

CIRNAC notes that the applicant proposes to limit withdrawals from any individual lake to no more than 0.10 m (10 cm) of lake surface elevation, with available seasonal withdrawal volume calculated as *lake surface area (m<sup>2</sup>) × 0.10 m* (Application for Water Licence Amendment, Block 13) .

This approach is presented as a conservative limit to protect aquatic habitat in the application, however the application does not identify the technical or regulatory basis for selecting the 10 cm drawdown threshold. It is also unclear how this measurement was first set and how it will be monitored during the drawdown period, taking into account factors such as freshet, groundwater flow, wind, waves and precipitation. As a result, it is unclear how this methodology aligns with accepted best practices for calculating lake withdrawals in Nunavut.

#### **Recommendation:**

(R-01) CIRNAC recommends that the applicant clarify the rationale and source documentation supporting the use of the 0.10 m lake-drawdown method, including how this measurement will be set and then monitored throughout the draw down period taking into account freshet, groundwater flows, wind, waves and precipitation, to support understanding of how this withdrawal limit is in line with Nunavut water management best practices.

### 2. Clarification on equipment and infrastructure used for water withdrawal.

#### **Comment:**

CIRNAC notes that the Application for Water Licence Amendment indicates that pumps with screened intakes will be used for water withdrawal and that pump rates will be managed to prevent entrainment/impingement (Block 13). However, the submission does not describe the intake equipment or infrastructure used, such as if pumps will be electric or gas power, will water be recirculated, what measure will be taken to minimize the disturbance to the shoreline, will the intake pipe have flotation device, etc. More information is needed to assess the risks to freshwater under operating conditions.

#### **Recommendation:**

(R-02) CIRNAC recommends that the applicant provide a description of the proposed water-intake infrastructure and methods, to ensure they are in line with Nunavut water management best practices.

### 3. Inconsistency Of Requested Water Use Volumes

#### **Comment:**

CIRNAC notes inconsistencies in annual water-use estimates. In the Application for Water Licence Amendment blocks 13, total annual water use is described as approximately 8,600 m<sup>3</sup>/year (based on expected operations), whereas in Block 19 the applicant uses an estimate of 10,950 m<sup>3</sup>/year (calculated as 30 m<sup>3</sup>/day × 365 days) to determine water-use fees for Inuit Owned Land (IOL). These differing estimates create uncertainty regarding the expected annual water demand and it makes it difficult to assess whether the estimated freshwater needs adequately reflect the scale and nature of the undertaking.

#### **Recommendation:**

(R-03) CIRNAC recommends that the applicant explain the total annual water-use calculations and the differing annual water-use estimates presented across Blocks 13 and 19. CIRNAC also recommends that the applicant provide the correct number of their estimated daily freshwater use for camp and drilling purposes and ensure that measures are in place to meter the actual water usage for the Annual Report.

### 4. Basis for Wastewater Volume Estimates.

#### **Comment:**

CIRNAC notes that the applicant estimates freshwater consumption of up to 10 m<sup>3</sup>/day per camp (Application for Water Licence Amendment, Block 13), while estimating greywater production at ≤5 m<sup>3</sup>/day (Block 13) or 2–3 m<sup>3</sup>/day (Block 14), and sewage generation at 0.025 m<sup>3</sup>/day (Block 14). Based on these values, the estimated total wastewater volume appears to be half or less of the estimated daily freshwater intake. The application does not explain the calculation or per-capita generation rates used to produce the wastewater production. As a result, it is unclear whether the proposed wastewater volumes are representative of the needs of the camp and drilling activities.

#### **Recommendation:**

(R-04) CIRNAC recommends that the applicant clarify the basis for the wastewater generation estimates and explain how these estimates relate to the stated freshwater consumption rates. This would help confirm whether the proposed wastewater management measures are appropriate for the anticipated camp and drilling activities.

## **5. Confusion about the Camp Population Used To Determine Water Use and Waste Estimates**

### **Comment:**

CIRNAC notes that most application materials describe camp occupancy as around 10–20 persons (Application For Water Licence Amendment block 4, Appendix A Question 1 and 4, Camp Questionnaire Question 7). However, the applicant also identifies a potential maximum population of 49 people at any given time, noting that this would require 20–25 tents and additional supporting structures (Camp Questionnaire, Question 7, Appendix A Question 4, Closure and Reclamation Plan Introduction, Waste Management Plan introduction and Spill And Fuel Management Plan Introduction).

It is unclear whether the applicant's estimates for daily freshwater consumption, greywater generation, and other waste volumes (Application For Water Licence Amendment block 13 et 15) are based on the typical 10–20 person camp or the upper-limit scenario of 49 occupants. This uncertainty affects the ability to assess whether the proposed water-use estimations and waste-management approach are appropriate for the full range of potential camp sizes.

### **Recommendation:**

(R-05) CIRNAC recommends that the applicant clarify which population scenario (10–20 persons or up to 49 persons) forms the basis for their current estimates of freshwater use and daily waste production. CIRNAC also recommends that estimates for both average planned camp occupancy and maximum planned camp occupancy be calculated to ensure that their water-use and waste-management planning is adequate for all possible scenarios.

## **6. Clarification on the establishment of Winter Tracks/Ice Road.**

### **Comment:**

CIRNAC notes references to winter tracks/ice road and overland access in the Application for Water Licence Amendment, block 9 (refers to “winter trails” and camp mobilization via snowcat and sled) and the equipment lists for the establishment of ice road/overland winter property access (e.g., snow cats, sleds, graders, plough trucks, water truck) in the supporting plans . There is also mention in the KIA Appendix A.1 that “Experienced members of the community will be engaged for winter track design”.

However, the use of broad language such as winter trails and ice road and the inclusion of a water truck and heavy machinery in the equipment list make it unclear if the applicant intends only over-snow travel or the construction of an ice road requiring water to build or maintain, which may require separate licensing beyond what is described in the current application.

**Recommendation:**

(R-06) CIRNAC recommends that the applicant clarify the intended approach to overland access by indicating what type of ice road and/or winter trail is proposed and ensure that the proper licensing is in place according to what is planned. This clarification will help ensure that the methods used are appropriately detailed within the scope of the current Water Licence Amendment.

**7. Missing Spill-response measures in case of fuel transfer or spill during transport.****Comment:**

CIRNAC notes that the applicant plans to transport personnel, fuel, and materials by both air and land, including helicopter, fixed-wing aircraft, snowcats, ATVs, and other equipment (Spill and Fuel Management Plan). The Spill Plan provides details on spill response at camp, fuel caches, and drill rigs, and confirms the presence of 20 L spill kits for on-site fuel transfers, but it does not describe spill-response procedures specific to in-transit fuel transfer or fuel spills, nor does it specify whether spill kits are carried on vehicles or aircraft during travel (Spill and Fuel Management Plan, Section 2.0).

This introduces uncertainty regarding how spills would be contained and managed while travelling between sites.

**Recommendation:**

(R-07) CIRNAC recommends that the applicant clarify the spill-response measures applicable during fuel transport activities, including whether spill kits are provided on vehicles and aircraft and how spills occurring in transit would be contained and ensure that all measures are included within the Spill and Fuel Management Plan.

**8. Inconsistency In Incineration Practices Across Submitted documentation****Comment:**

CIRNAC notes an inconsistency between the Exploration/Remote Camp Supplementary Questionnaire and the supporting management plans. In the Exploration/Remote Camp Supplementary Questionnaire, the applicant states that *“There will be no formal incineration; cardboard and other non-toxic combustible waste may be burned in a drums as required”* (Remote Camp Questionnaire, Question 33).

However, the Waste Management Plan describe the use of dual-chamber incinerators at each camp for incineration of non-hazardous waste and sewage (Waste Management Plan, table 1). The Spill and Fuel Management Plan also lists an incinerator per camp within the camp equipment inventory (Spill and Fuel Management Plan, p.5). This

discrepancy creates uncertainty regarding the actual waste treatment methods proposed for the amendment.

**Recommendation:**

(R-08) CIRNAC recommends that the applicant confirms that incineration in a dual-chamber incinerator is part of the Waste Management Plan and ensures that the information regarding the use of incinerators is consistent across the submitted documentation.

## **9. Legacy Use of Camp Areas and Potential Existing Liabilities**

**Comment:**

CIRNAC notes that the proposed camp and drilling areas have a history of prior use and disturbance, including exploration activities at the Jura site since the late 1960s and at the Hope Lake airstrip since the 1950s–1960s (Remote Camp Questionnaire, Q.8). The proponent also indicates that the Hope Lake airstrip was used as a camp area as recently as 2025 by other exploration companies, including Tundra Copper Corp and White Cliff Minerals (Q.8) .

While the application states that “*Prior to mobilization, nearby operators will be notified and provided a 24/7 contact to coordinate water-source use and traffic*” (Application, Block 18), it is unclear to which extent pre-existing liabilities have been considered at locations proposed for renewed camp establishment.

**Recommendation:**

(R-09) CIRNAC recommends that pre-existing liabilities be identified, documented, and reported to the NWB and the land owner to ensure that they are monitored and assessed throughout the license. The applicant is reminded that legacy issues and liabilities will be inherited by the new proponent.

## **10. Confirmation Whether The Exploration/Remote Questionnaire Submitted Is The Intended Final Version.**

**Comment:**

CIRNAC notes that the Exploration/Remote Camp Supplementary Questionnaire submitted with the application appears to be a PDF generated from a Word document in reviewing mode, containing visible tracked changes, comments, and formatting marks throughout the document. The Applicant identification and the Licence No. are not indicated as well. This makes it unclear whether the questionnaire reflects the applicant's

finalized document or an internal draft and makes assessing the accuracy and compliance of information provided in the document difficult.

**Recommendation:**

(R-10) CIRNAC recommends that the applicant confirms whether the version submitted contain all the correct and relevant information or if correction are needed and provide the final clean version of the *Exploration/Remote Camp Supplementary Questionnaire* with tracked changes removed, to ensure it accurately reflects the information intended for review.

**11. Missing Attachment Number for Wildlife Management Plan in the Application document**

**Comment:**

CIRNAC notes that in the Application for Water Licence Amendment (Block 17), the applicant references a Wildlife Management Plan as “attachment XX”.

**Recommendation:**

(R-11) CIRNAC recommends that the applicant identify the correct attachment number for the Wildlife Management Plan and ensure it is clearly referenced in the Application document.

**12. Inconsistent Camp Identification in Map 5 Description**

**Comment:**

CIRNAC notes that in Block 9 of the Application for Water Licence Amendment, the document titles Map 5 as “*Hope Lake Camp*”. However, the accompanying descriptive text states: “*This map shows proposed camp location for the Jura camp, on Crown land*”. This brings confusion on which camp the map is meant to show.

**Recommendation:**

(R-12) CIRNAC recommends that the applicant clarify which camp Map 5 is intended to depict and update the map title and description accordingly to ensure it contains the correct information.

**13. Missing date In The Application For Water Licence Amendment Document.**

**Comment:**

CIRNAC notes that the Application Submission Date is absent on the cover page of the Application for Water Licence Amendment.

**Recommendation:**

(R-13) CIRNAC recommends that the applicant add the correct submission date for this amendment application.