



February 10, 2015

via electronic mail

Phyllis Beaulieu
Manager of Licencing
Nunavut Water Board
PO Box 119
Gjoa Haven
Nunavut, X0B1J0

RE: Response to AANDC Comments - 2BE-CRA1015 Water Licence Renewal

Dear Ms. Beaulieu,

Background

On November 26, 2014 North Country Gold Corp. ('NCGC', 'the company') submitted an application to the Nunavut Water Board (NWB) to renew water licence 2BECRA1015 for a further 10 years. The NWB acknowledged receipt of the application on December 5, 2014. The renewal application was posted for public review on December 19, 2014 inviting interested parties to make submissions on or before January 19, 2015.

NCGC received comments from Aboriginal Affairs and Northern Development (AANDC) Water Resources Division on January 19, 2015. This letter addresses comments and information requested by AANDC.

Inspection Report

NCGC acknowledges that the backhaul of Hazardous Waste as requested in the 2014 Waster Licence Inspection Report (Items 1 and 9) remains outstanding. NCGC acknowledges the inspectors request to remove this waste and provide records by March 15, 2015. NCGC wishes to advise AANDC and the NWB that it is presently process of planning the necessary logistics to undertake waste backhaul and that additional information will be provided as soon as possible.

Comprehensive Spill Contingency Plan

NCGC wishes to confirm that drip pans and other secondary containment devices will be used when refuelling of fuel transfer operations take place. NCGC's *Fuel Management Plan* (Section 8 'Fuel Handling and Transfer', Page 6) and *Spill Prevention and Contingency Plan* (Section 7.2.2 'Petroleum Products Transfer', Page 12) provides additional detail on refuelling and fuel transfer.



NCGC has updated the *Spill Prevention and Response Plan* (Revision 2, January 2015, attached to this letter) to reflect AANDC Manager of Field Operations as the single AANDC contact as opposed to specific AANDC personnel.

Transport Management Plan

NCGC has prepared a stand-alone document titled '*Proposed Hayes Camp to Three Bluffs all-weather access road Transportation Management Plan*', (Revision 0, January 2015) to outline the planned road. This document is attached to this letter.

Waste Management Plan

NCGC acknowledges that it is required to have proper authorizations for any hamlet and or other municipality or landfill where project wastes will be deposited. NCGC will provide this information to relevant regulators prior to waste backhaul, once waste destinations are confirmed.

NCGC acknowledges that in order to transport hazardous wastes in Nunavut the company must be registered as a waste generator with the Government of Nunavut, Environmental Protection Division and that waste manifests must accompany all hazardous waste until received by an approved registered facility. NCGC's hazardous waste number is NUG-100039. Further information on Hazardous Waste Management is provided in NCGC's *Comprehensive Waste Management Plan* (Section 6.2 'Hazardous Waste', pages 7-8).

Fuel Management Plan

NCGC acknowledges the requirement that all fuel caches should be in secondary containment and that these containment structures be checked on a regular basis. Additional detail is provided in NCGC's *Fuel Management Plan* (Section 6.0 'Fuel Storage', page 5; Section 7.0 'Secondary Containment', page 6; and Section 11 'Inspections', page 8) and NCGC's *Spill Prevention and Response Plan* (Section 7.2.1 'Storage', page 11; Section 7.2.3 'Secondary Containment' page 12; and Section 7.5 'Inspections', page 12-13).

Quarry Development Plan

All existing quarry sites (as described in NCGC's Quarry Development Plan) have been developed in material comprising quartz rich sands, and non-mineralized granitic cobbles and boulders. NCGC does not expect that this material will be acid generating or metal leaching.

NCGC will complete geochemical sampling of existing quarry site at the earliest opportunity to confirm this.



Conclusions

I trust that the above information sufficiently addresses AANDC's comments. Please do not hesitate to contact myself using the details provided below should you require additional information.

Sincerely,

A handwritten signature in black ink that reads 'Simeon Robinson'.

Simeon Robinson
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