

Your file - Votre référence 2BE-CRA1520

June 12, 2015

Our file - Notre référence IQALUIT-#918242

Phyllis Beaulieu
Manager of Licensing
Nunavut Water Board
GJOA HAVEN, NU X0E 1J0

Re: Aboriginal Affairs and Northern Development Canada Review of North Country Gold Corp's Application to Amend Water Licence No. 2BE-CRA1520

Dear Ms. Beaulieu:

Thank you for your email of May 13, 2015, concerning the above mentioned application. A memorandum is provided for the Board's consideration. Comments and recommendations have been provided pursuant to Aboriginal Affairs and Northern Development Canada's mandated responsibilities under the *Nunavut Waters and Nunavut Surface Rights Tribunal Act* and the *Department of Indian Affairs and Northern Development Act*.

Please do not hesitate to contact me by telephone at 867-975-4555 or email at David.Abernethy@aandc-aadnc.gc.ca for further information.

Sincerely,

David Abernethy
Regional Coordinator
Water Resources Division
Resource Management Directorate
Aboriginal Affairs and Northern Development Canada
IQALUIT, NU X0A 0H0

Encl.

c.c.: Andrew Keim, A/Manager, Water Resources Division, AANDC Nunavut Erik Allain, Manager, Field Operations Division, AANDC Nunavut



Memorandum

To: Phyllis Beaulieu, Nunavut Water Board

From: David Abernethy, Aboriginal Affairs and Northern Development Canada

CC: Andrew Keim (AANDC) and Erik Allain (AANDC)

Date: June 12, 2015

Re: Application to Amend Water Licence No. 2BE-CRA1520

Applicant: North Country Gold Corp
Project: Committee Bay Project

Region: Kitikmeot

Comments:

A. Background

On May 13, 2015, the Nunavut Water Board (NWB) provided notification of North Country Gold Corp's (the "proponent") application to amend the type B water licence for their Committee Bay Gold Project, No. 2BE-CRA1015. A licence amendment is required to establish fly camps that will support exploration activities outside the identified Three Bluffs Deposit.

As stated in the application, the following activities are planned for the 2015 exploration summer season:

- Ground IP geophysical surveys over selected prospects;
- Utilization of a GT Probe rubber track mounted soil sampling unit;
- Utilization of a GT RAB drill rubber track mounted unit to sample bedrock;
- · Prospecting and geological mapping; and
- Utilization of up to 12 fly camps (up to 2 concurrently) to facilitate geophysics, drilling, soils sampling, and/or prospecting.

Domestic water use for project activities will not exceed 50 cubic metres per day. The RAB and Probe drills do not require water. Water consumption and drill cuttings associated with diamond drills will be managed in accordance with existing licence terms and conditions.

The Committee Bay Project is located on Crown Owned Land and Inuit Owned Land approximately 220 km south of Kugaaruk, 235 km west of Repulse Bay, and 300 km northeast of the Meadowbank Mine near Baker Lake.

Interested parties were asked to review this application and provide comments by June 13, 2014.

B. Results of review

On behalf of Aboriginal Affairs and Northern Development Canada (AANDC), the following comments and recommendations are provided:

1. Temporary Winter Road and/or Ice Strip Flooding

Source: Exploration Remote Camp Questionnaire, Item No. 27

Comment: The proponent is requesting the use of water from nearby lakes and streams to

support the construction of temporary winter roads and/or ice strip flooding. The

daily consumption requirements are not provided.

Recom: The proponent should include the volume of water consumed per day by activity

type as well as their respective sources in annual report submissions (e.g., the volumes used for the construction of temporary winter roads and/or ice strip flooding). The total daily water consumption limit of 295 m³ must be respected

(Part C, Item 1 of the licence).

2. The Use of Streams as Water Sources

Source: Exploration Remote Camp Questionnaire, Item No. 27

Comment: The proponent states that local nearby lakes and streams will be used as water

sources for domestic use, diamond drilling operations, and other activities (e.g., temporary winter road and/or ice strip flooding). Pursuant to Part C, Item 2, written Board approval is required when using streams as water sources.

Recom: The proponent should identify any streams that it plans to use as water sources

and receive written approval from the Board prior to their use pursuant to Part C,

Item 2 of the licence. A written request for such water use must be made in

accordance with Part C, Item 3 of the licence.

3. Open Burning of Approved Waste Materials at Fly Camps

Source: Exploration Remote Camp Questionnaire, Item No. 27

North Country Gold Corp. Addendum No. 1 to Comprehensive Waste

Management Plan. March 19, 2015.

Comment: The proponent is requesting the ability to open burn small amounts of approved

material at its fly camps. No details have been provided with respect to the types

of waste materials that will be burned at these locations.

Recom: There should be no issue if the proponent open burns combustible wastes in

accordance with its Comprehensive Waste Management Plan. Addendum No. 1

to this plan states:

Large pieces of untreated wood, cardboard, and material comprised of natural fibres may be burned in a controlled burn in accordance with the Government of Nunavut's Guideline for the burning of and incineration of solid waste when authorization has been granted by the NWB.

Residual ash should be contained in an area at least 31 metres away from the ordinary high water mark of any water body such that the quality, quantity, or flow of water is not impaired, unless otherwise approved by the Board in writing (consistent with Part D, Item 3 of the licence).

It is noted that section 6.1.2 of the proponent's *Comprehensive Waste Management Plan* states that all ash from incineration and burning will be collected in empty drums, sealed, labelled, and shipped offsite to an approved disposal facility. The proponent should be reminded that any on-site landfilling of domestic waste, including ash, requires written Board approval pursuant to Part D, Item 4 of the licence.

4. Notification of Fly Camp Locations

Source: Application for Water Licence Amendment Form, Item No. 4

Map B

Comment: The proponent provided approximate locations for the planned fly camps in a

map accompanying its application. It has committed to provide notice of the exact

locations 10 days prior to setting up these camps.

Recom: The amended water licence should include a term and condition requiring the

proponent to provide at least ten days notification to an Inspector prior to

establishing any fly camp. The notice should identify the water source(s) that will

be used to support domestic and exploration activities.

Prepared by David Abernethy