



Water Resources Division
Resource Management Directorate
Nunavut Regional Office
918 Nunavut Drive
Iqaluit, NU, X0A 3H0

Your file - Votre référence
2BE-CRA2025
Our file - Notre référence
GCDocs# 135285103

April 14, 2025

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

**Re: Crown-Indigenous Relations and Northern Affairs Canada's Review of the
Licence Renewal Application for Committee Bay Project – Three Bluffs Deposit,
Type B Water Licence No. 2BE-CRA2025**

Dear Richard,

Thank you for the March 20, 2025 invitation to review the referenced licence renewal application, submitted by Fury Gold Mines Limited on behalf of North Country Gold Corp, for Type B Water Licence No. 2BE-CRA2025.

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.

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 (867) 975-3877 or Joyce.Demers@rcaanc-cirnac.gc.ca or Andrew Keim at (867) 975-4550 or Andrew.Keim@rcaanc-cirnac.gc.ca.

Sincerely,

Joyce Demers, B.Sc.,
Industrial Coordinator

Canada 



Technical Review Memorandum

Date: April 14, 2025

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

From: Joyce Demers – Industrial Coordinator, CIRNAC

Subject: Crown-Indigenous Relations and Northern Affairs Canada's Review of the Licence Renewal Application for Committee Bay Project – Three Bluffs Deposit, Type B Water Licence No. 2BE-CRA2025

Region: ☐ Kitikmeot ☒ Kivalliq ☐ Qikiqtani

A. BACKGROUND

The Committee Bay Project (CBP) is a project owned by North Country Gold Corp. It is located 335 km northeast of Baker Lake, 220 km south of Kugaaruk and 235 km away from Nauyasat. North Country Gold Corp is a fully owned subsidiary of Fury Gold Mines Limited. Fury Gold Mines Limited is applying for a 10 year renewal on behalf of North Country Gold Corp for their Type B Water Licence No. 2BE-CRA2025.

CBP has four camp sites: Hayes (66°39'30" N, 091°32'11" W), Bullion (66°23'39" N, 093°06'55" W), Ingot (66°35'40" N, 092°37'34" W), and Crater (67°22'19" N, 088°51'24" W).

Hayes Camp: provides accommodations for up to 100 people, has a graded esker airstrip and a winter ice airstrip, a winter ice road, it is the storage location for mobile equipment and earthmoving equipment, power generators, a waste water treatment system, dual chamber incinerator, four bulk diesel 35,000 fuel tanks, explosive storage, and storage fuel and oil storage.

Bullion Camp: provides accommodations for up to 40 people, has a tundra airstrip, small generator, drummed fuel cache and it is used for to support seasonal exploration in the southern portion of the project.

Ingot Camp: provides accommodations for up to 30 people, has a tundra airstrip, generator, fuel storage and it is used for to support seasonal exploration in the central southern portion of the project.

Crater Camp: provides accommodations for up to 40 people, has a tundra airstrip, generator, drummed fuel cache and it is used for to support seasonal exploration in the northern portion of the project. CBP drill area and cache: is located approximately 5km east-southeast of Hayes Camp. It has three diamond drills and associated equipment. It also has a shop, fuel and consumables cache.



CBP is occupied seasonal typically between March and October. The application is to use 295 m³/day of water where 50 m³/day will be used for camp purposes including all camps and 245 m³/day for diamond drilling activities. Activities for this project include: prospecting, geological mapping, rock, till and soil sampling, airborne and ground geophysics, drilling and quarrying. There are also future plans to build a all-weather road from Hayes Camp to Three Bluffs gold deposit and drilling area as well as infrastructure enhancements such as expansion of the airstrip at Hayes Camp.

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
R1	Hayes Camp Distances
R2	Fuel Management Plan Clarification
R3	Water Management Procedures
R4	Explosive Management Plan
R5	Corporate and Social Responsibility Action Plan
R6	Corporate and Social Responsibility Action Plan
R7	Spill Prevention and Response Plan
R8	Comprehensive Waste Management Plan
R9	Abandonment and Reclamation Plan

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
250306 2BE-CRA2025 Application for Water Licence Renewal-IMLE	Fury Gold Mines Ltd., March 3 2025
250306 2BE-CRA2025 Cover Letter Renewal Application-IMLE	North Country Gold Corp. / Fury Gold Mines Ltd., March 6, 2025
250309 2BE-CRA2025 Abandonment and Reclamation Mar2025-IMLE	North Country Gold Corp., March 2025
250309 2BE-CRA2025 Archaeology and Palaeontology March 2025-IMLE	North Country Gold Corp., March 2025
250309 2BE-CRA2025 Comprehensive Waste Management Plan March2025-IMLE	North Country Gold Corp., March 2025
250309 2BE-CRA2025 Corporate and social responsibility action plan Mar2025-IMLE	North Country Gold Corp., March 2025
250309 2BE-CRA2025 Explosives Management Plan Mar2025-IMLE	North Country Gold Corp., March 2025
250309 2BE-CRA2025 Fuel Management Mar2025-IMLE	North Country Gold Corp., March 2025
250309 2BE-CRA2025 Quarry development plan Mar2025-IMLE	North Country Gold Corp., March 2025
250309 2BE-CRA2025 Spill Prevention and Response Plan Mar2025-IMLE	North Country Gold Corp., March 2025
250309 2BE-CRA2025 Waste Water Treatment System Plan_Mar2025-IMLE	North Country Gold Corp., March 2025
250320 2BE-CRA1520 Renewal Notice-OMLE	Nunavut Water Board, March 20, 2025
250320 2BE-CRA2025 Renewal Notice-OMLE	Nunavut Water Board, March 20, 2025
250320 2BE-CRA2025 Water Licence Renewal Dist-OMLE	Nunavut Water Board, March 20, 2025



C. RESULTS OF REVIEW

1. Hayes Camp Distances

Comment:

It is unclear if the incinerator, waste staging area and sleeping tent 22 and 23 are a minimum of 31 meters from the normal high water mark of any water body.

The concern is that if these areas were within 31 meters from the normal high water mark of any water body that there is a higher chance of waste or unwanted items ending up into waterbodies.

Recommendation:

(R-01) CIRNAC recommends that the applicant confirm that the incinerator, waste staging area and sleeping tent 22 and 23 are a minimum of 31 meters from the normal high water mark of any water body.

2. Fuel Management Plan Clarification

Comment:

In the Fuel Management Plan under section 7.2 states that

“Should snow or water accumulate within secondary containment it will be inspected and tested for the presence of any visible sheen of oil or grease before it is discharged. If contaminants are identified within accumulated melt or storm water it will be treated (using a SEI Industries ‘Rain Drain’ or equivalent filter) prior to release into the environment.”

It is unclear where this water will be released. The inspection report had pictures of the secondary containment units and the Rain Drain or equivalent filters were not attached to the containment units. It is also unclear how this water will be transported before treatment and eventual release. The concern is that potentially contaminated water will be released or accidentally spilled within 31 meters from the normal high water mark of any water body.

Recommendation:

(R-02) CIRNAC recommends that the applicant clarify procedures with regards to the water which will be accumulated within the secondary containment units.



3. Water Management Procedures

Comment:

Section 4.4 in the Quarry Development Plan states that

- “• Water will be pumped out of the quarried areas carefully, and will be directed along the natural drainages that have erosion control measures erected; or,
- Water will be drained off by the creation of a ditch which will direct water from the pond downslope away from the quarry area. The ditch would be monitored.”

It also states that

“If water quality is a concern, due to TSS, water will be collected in a sump and pumped through a form of “filters” before release overland toward the natural drainages.”

The concern is that there is no mention of if these natural drainage points would be within 31 meters from the normal high water mark of any water body or if they led directly into a water body. There are also no further mention of when these TSS tests will be conducted.

Recommendation:

(R-03) CIRNAC recommends that the applicant clarify when TSS tests will be conducted and if the water from the quarries will be deposited at least 31 meters away from the normal high water mark of any water body.

4. Explosive Management Plan

Comment:

Section 7.1 of the Explosive Management Plan states that

“The explosive storage area will be located more than 30m from the nearest high water mark of any stream or water body.”

The concern is that the distance should be 31 meters.

Recommendation:

(R-04) CIRNAC recommends that the applicant confirm that the distance is over 31 meters and to edit the document to that effect.



5. Corporate and Social Responsibility Action Plan

Comment:

Section 14.6 Drilling On ice states that

“Drilling fluids and cuttings will be disposed of on land in a natural depression or excavated sump or otherwise in accordance with the land use permit.”

The concern is that there is no mention of these fluids or cutting being deposited at least 31 meters away from the normal high water mark of any water body.

Recommendation:

(R-05) CIRNAC recommends that the applicant confirm that the drill fluids and cuttings will be disposed of at least 31 meters away from the normal high water mark of any water body.

6. Corporate and Social Responsibility Action Plan

Comment:

Section 15 camp site selection and design states that

“To prevent disruption to flora and fauna, camps, wherever possible, will be located in naturally clear areas more than 31 metres from the high water mark of any nearby water body. Sites will be selected in areas not frequented by wildlife.”

Must read will be located 31 meters away from the normal high water mark of any water body and not wherever possible.

Recommendation:

(R-06) CIRNAC recommends that the applicant ensure that camp sites be located at least 31 meters away from the normal high water mark of any water body.

7. Spill Prevention and Response Plan

Comment:

The Spill Prevention and Response Plan Appendix 3 is missing.

CIRNAC notes that in the Comprehensive Waste Management Plan it states that MSDS can also be found in the Spill Prevention and Response Plan however they are not attached to this plan. Under section 7.2.1 of the Spill Prevention and Response Plan states that the MSDS sheets are in a binder close to all caches. MSDS provide lots of valuable information



and CIRNAC recognizes that having these MSDS with the Spill Prevention Plan maybe of value during a spill and could reduce the time needed to reach to another binder for the information. CIRNAC appreciates that the MSDS are also in strategic places and would like to also see the sheets remain in those areas as well.

Recommendation:

(R-07) CIRNAC recommends that the applicant provide Appendix 3 and the MSDS for in next iteration of the plan.

8. Comprehensive Waste Management Plan

Comment:

The comprehensive Waste Management Plan does not indicate:

- a) Where general waste will be stored;
- b) Where or how Contaminated soils/ water be stored;
- c) The waste water treatment system plan under section 8.1.1 mentions filters, debris and large particles however it is not mentioned in the waste management plan.

The concern is that without the proper information waste may end up in undesired locations which may increase the changes of them ending up within 31 meters away from the normal high water mark of any water body.

Recommendation:

(R-08) CIRNAC recommends that the applicant provide the desired information in the Comprehensive Waste Management Plan.

9. Abandonment and Reclamation Plan

Comment:

Section 9.0 Post Closure Monitoring states that

“After the completion of reclamation, two years on annual terrestrial and aquatic monitoring will take place in the late summer.”

The concern is that two years of post monitoring closure is not enough time to ensure that reclamation is completed.

Recommendation:

(R-09) CIRNAC recommends that the applicant conduct a minimum of 25 years post closure monitoring.