



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

Your file - Votre référence
2BE-HAK2126
Our file - Notre référence
GCDocs# 142532774

January 5, 2026

Robert Hunter
Licensing Administrator
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 Hackett River Project, Type B Water Licence No. 2BE-HAK2126

Dear Robert,

Thank you for the November 26, 2025 invitation to review the referenced licence renewal application, submitted by Glencore Canada Corp., for Type B Water Licence No. 2BE-HAK2126.

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.

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 Ds

Joyce Demers, B.Sc.,
Industrial Coordinator



Technical Review Memorandum

Date: January 5, 2026

To: Robert Hunter – Licensing Administrator, 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 Hackett River Project, Type B Water Licence No. 2BE-HAK2126

Region: Kitikmeot Kivalliq Qikiqtani

A. BACKGROUND

The Hackett River Project is located in the West Kitikmeot region of Nunavut approximately 300 km south of Cambridge Bay and 80 km southwest of Bathurst Inlet at the geographical coordinates 65° 55' N and 108° 22' W. The project is located within the Bathurst Inlet-Burnside watershed and is owned and operated by Glencore Canada Corporation (Glencore). Glencore operates the exploration project under type B water licence number 2BE-HAK2126.

Glencore is applying for a 5 year renewal of the water licence. The project dates back to 1956 with varies owners. The project has been in Care and Maintenance since August 2013. During Care and Maintenance Glencore has done progressive reclamation work and has only occupied and inspected the site occasionally for short durations during the summer with a small group of up to six individuals. The current application is to allow year round access. It is possible that the project may come out of Care and Maintenance during the life of the licence in which time environmental studies are expected to take place.

The application is to use 299 m³/day of water. 30 m³/day for camp use and 269 m³/day for drilling, ice strip and other exploration related uses. The water will be obtained using electric pumps with screens. Water for camp purposes will be obtained from Camp Lake. Camp Lake and other proximal lakes or ponds to drilling targets or ice strip(s) will be used if there is sufficient volume.

The project consists of a 120 person capacity camp, a drill laydown area, and two airstrips (land in summer and ice in winter) and three helipads. The camp is accessed by fixed wing plane or helicopter.

The water licence application is to: obtain water for camp purposes; alter flow/store water, construct and maintain the winter access/ice strip; exploration activities such as surficial mapping, geophysical surveys, core logging, diamond drilling and environmental monitoring;



continuation of reclamation work such as cleaning up of the camp, areas affected by historic exploration activities, and areas affected by Glencore’s future exploration activities.

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 | Missing Management Plans and Missing Information |
| R2 | Spill Contingency Plan |
| R3 | Abandonment and Restoration Plan |
| R4 | Post Closure Monitoring Duration |
| R5 | Consistency Between Plans |
| R6 | 2016 Inspection Report |

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 |
|--|--|
| 251124 2BE-HAK2126 Application Cover Letter-ILAE | Glencore Canada Corp., October 31, 2025 |
| 251124 2BE-HAK2126 Att 1 WL Renewal Application Form-ILAE | Glencore Canada Corp., October 28, 2025 |
| 251124 2BE-HAK2126 Att 2 Project Maps-ILAE | Glencore Canada Corp., N.D. |
| 251124 2BE-HAK2126 Att 3 2025-11-21-NPC File # 150964 Hackett River Project-ILAE | Nunavut Planning Commission, November 21, 2025 |
| 251124 2BE-HAK2126 Att 4 NIRB Screening Decision Reports-ILAE | Nunavut Impact Review Board, December 10, 2009 |
| 251124 2BE-HAK2126 Att 5 SUMMARY OF ENVIRONMENTAL REPORTS AND STUDIES-ILAE | Glencore Canada Corp., N.D. |
| 251124 2BE-HAK2126 Att 6 PLAIN LANGUAGE SUMMARIES-ILAE | Glencore Canada Corp., N.D. |
| 251124 2BE-HAK2126 Att 7 PAYMENT OF NWB APPLICATION FEE AND DEPOSIT-ILAE | Nunavut Water Board, October 30, 2025 |
| 251124 2BE-HAK2126 Att 8 TABLE OF LEASES AND AUTHORIZATIONS-ILAE | Glencore Canada Corp., N.D. |



| Document Title | Author, File No., Rev., Date |
|--|---|
| 251124 2BE-HAK2126 Att 9 CERTIFICATE OF NAME CHANGE-ILAE | Glencore Canada Corp., October 9, 2013 |
| 251124 2BE-HAK2126 Att 10 ENGAGEMENT RECORD-ILAE | Glencore Canada Corp., N.D. |
| 251124 2BE-HAK2126 Att 11 REPRESENTATIVE AUTHORIZATION-ILAE | Glencore Canada Corp., October 27, 2025 |
| 251124 2BE-HAK2126 Glencore-SpillContingencyPlan-HackettCamp-Feb 172025-ILAE | Glencore Canada Corp., February 3, 2025 |
| 251124 2BE-HAK2126 Hacket River A&R Plan includes Cost Estimate December 2024-ILAE | Glencore Canada Corp., December 12, 2024 |
| 160909 2BE-HAK1621 Inspection of July 6 2016-IAAE | Indigenous and Northern Affairs Canada, September 9, 2016 |
| 160915 2BE-HAK1621 Licensee reponse to Inspection of July 6 2016-IVKE | Glencore Canada Corp., September 15, 2016 |
| 161213 2BE-HAK1621 2016 Annual Report Form-IAAE | Rick Schwenger, N.D. |
| 171109 2BE-HAK1621 2017 Annual Report-ILAE | Rick Schwenger, March 22, 2016 |
| 181206 2BE-HAK1621 2018 Annual Report-ILAE | Glencore Canada Corp., December 3, 2018 |
| 191211 2BE-HAK1621 2019 Annual Report Cover-IMLE | Glencore Canada Corp., December 11, 2019 |
| 201112 2BE-HAK1621 2017-2019 Annual Report Tech Review-OSKE | Nunavut Water Board, November 12, 2020 |
| 201127 2BE-HAK1621 2020 Annual Report-IMLE | Glencore Canada Corp., November 25, 2020 |
| 220321 2BE-HAK2126-2021 Annual Report-IAAE | Glencore Canada Corp., March 2022 |
| 230227 2BE-HAK2126 2022 Annual WL Report-ILAE | Glencore Canada Corp., February 2023 |
| 240330 2BE-HAK2126 Annual WL Report 2023-ILAE | Glencore Canada Corp., March 2024 |
| 250313 2BE-HAK2126 2024 Annual Report-ILAE | Glencore Canada Corp., March 2025 |



C. RESULTS OF REVIEW

1. Missing Management Plans and Missing Information

Comment:

Below is a list of missing information:

- a. The application does not include a waste management plan. The concern is that the information for the plan are either scattered in other plans or missing. A waste management plan is needed to ensure that waste is properly managed with a transfer schedule is in place.

There is missing information on how hazardous materials and all waste types are stored. Hazardous materials and waste must be stored in secondary containment and a minimum 31 meters away from the normal high water mark of any water body, while non-hazardous waste only needs to be stored a minimum 31 meters away from the normal high water mark of any water body.

The Nunavut Water board in a letter to the applicant, dated November 12, 2020, stated that an updated Waste Management Plan was due on May 31, 2016. An updated plan was submitted to the Nunavut Water Board on November 13, 2020 however this plan was not submitted as part of the application process. It is unclear why the plan was not submitted for review with the application.

- b. It is also unclear if drilling will occur within 31 meters of the normal high water mark of any water body.
- c. There is no mention of capping or other measures if artesian flow is hit while drilling.
- d. It is not clear if all structures are located beyond the 31 meter set back required from normal high water mark of any water body from the images provided.

The concern is that without this information it is possible for materials to be stored improperly which may cause hazardous materials to end up in nearby water bodies.

Recommendation:

(R-01) CIRNAC recommends that the applicant provide a Waste Management Plan and the other missing information.



2. Spill Contingency Plan

Comment:

There are a few issues noted in the Spill Contingency Plan:

- a. Confirmation if MSDS are included within the Spill Contingency Plan. The concern is that if a spill does occur that all information of products and how to clean the spill are all in one spot. It is unclear if the printed version of the MSDS described in section 4 of the plan are located with the printed version of the Spill Contingency Plan.
- b. Section 7.3 reporting spills lists CIRNAC's contact information as (867) 975- 4296 however it is now (867) 975-4553. Appendix A CIRNAC contacts need to be updated. Jonathan Mesher - Resource Management Officer: (867) 222-0118; Erik Allain – Director of Lands: (867) 975-4295; Jeremy Fraser – Manager of Field Operations: (867) 975-4553.
- c. Page number 22 of the Spill Contingency Plan has an overlay error which makes it difficult to read.
- d. In the Spill Contingency Plan section 7 states that “The ERP should be activated when there is a spill of any hazardous material.” However ERP is never defined. Given the context it is understood as the Emergency Response Plan which is presumed to be the Spill Contingency Plan. If not, and the ERP is a stand alone plan please submit it for review.

What is the concern is that without this information it is possible for hazardous materials to end up in nearby water bodies more readily as individuals may be looking for the desired information.

Recommendation:

(R-02) CIRNAC recommends that the applicant provide the missing information above.

3. Abandonment and Restoration Plan

Comment:

There are a few items which should be updated in the next iteration of the Abandonment and Restoration plan:

- a. The revision history should contain a table with the minimum information: date of revision, section number that was changed, and a summary of the changes made.
- b. Several section of the plan refer to AANDC such as Section 1 Introduction states that the issuing body is AANDC. The updated name of the department is Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC) and should be reflected throughout the plan.



- c. Suggestion: the revision history table should be located at the start of the plan before the introduction to ensure more clarity between versions which will allow for a quicker review of the plan.

Recommendation:

(R-03) CIRNAC recommends that the plan be updated to include the comments above and submitted so that it can be reviewed and commented on.

4. Post Closure Monitoring Duration

Comment:

Section 7 of the Abandonment and Restoration plan states that

“Post closure monitoring and inspection will occur annually for 2 years after final reclamation activities completed to confirm site stability.”

The concern is that two years is not enough time after closure to be completed to ensure that physical and chemical stability is reached. CIRNAC recommends a minimum of 25 years post closure to ensure chemical and physical stability of the site.

Recommendation:

(R-04) CIRNAC recommends that the applicant change the plan to reflect a minimum of 25 years post closure monitoring to ensure chemical and physical stability of the site.

5. Consistency Between Plans

Comment:

There are a few minor discrepancies between plans such as the number of helicopter pads and distances between the closest communities.

Recommendation:

(R-05) CIRNAC recommends that the plans be updated to correct for these discrepancies and submitted within 90 days for review. Note that submission of new plans with the annual report is not supported. New plans and updates should be submitted as stand alone documents for review.

6. 2016 Inspection Report

Comment:

There were a number of concerns brought up in the last inspection completed on July 6, 2016. The applicant submitted a letter, dated September 15, 2016, to the Nunavut Water Board as a response addressing some of the concerns. Annual reports dated from 2016 to



2024 do not include any other information regarding the concerns brought up in the 2016 Inspection Report. The concern is that the required remediation are still outstanding.

Recommendation:

(R-06) CIRNAC recommends that the applicant provide an update to the 2016 Inspection Report.