



Hook Lake Project New Application for Water Licence 2BE-HLP----

Eric Sondergaard <eric@6106.ca>

Thu, Jun 4, 2026 at 12:15 PM

To: Robert Hunter <robert.hunter@nwb-oen.ca>

Cc: Denise Lockett <lockett@telus.net>, Abid Jan <abid.jan@nwb-oen.ca>, Licensing Department <licensing@nwb-oen.ca>

Good afternoon Robert,

Please accept the following response on behalf of 6106 Resources Limited regarding Party comments received for the Hook Lake Project Type B Water Licence Application, file 2BE-HLP.

6106 Resources thanks Fisheries and Oceans Canada and Crown-Indigenous Relations and Northern Affairs Canada for their review of the application. We have reviewed the comments and provide the following responses and commitments.

Response to Fisheries and Oceans Canada

6106 Resources acknowledges DFO's comments regarding potential effects from water withdrawal, including the risk of fish entrainment or impingement.

All water intakes used for camp or drilling purposes will be fitted with appropriate end-of-pipe fish protection screens. Intake screens will be installed, operated, inspected and maintained in accordance with applicable DFO guidance and codes of practice.

Water withdrawal will be conducted in a manner that avoids disturbance to beds and banks, minimizes turbidity, and avoids impacts to fish and fish habitat. 6106 will also respect applicable Nunavut in-water work restricted activity timing windows where relevant.

6106 further acknowledges DFO's comment that, if the project meets the criteria for a site-specific review, the appropriate request for review should be submitted to DFO. Based on the current scope of the proposed exploration program, water use will be temporary and limited to camp and drilling support. No alteration of fish habitat is proposed. If final project design or field conditions indicate that a DFO site-specific review is required, 6106 will submit the appropriate request to DFO before undertaking the relevant activity.

6106 also acknowledges the Duty to Notify DFO if fish death or the harmful alteration, disruption or destruction of fish habitat has occurred or is about to occur. This requirement will be incorporated into field procedures and the Spill Contingency and Fuel Management Plan.

Response to Crown-Indigenous Relations and Northern Affairs Canada

R-01 – Missing Management Plans and Supplemental Information Guideline

6106 accepts CIRNAC's recommendation. The attached response package will include the following supplemental materials:

1. Spill Contingency and Fuel Management Plan;
2. Abandonment and Restoration Plan, including interim and seasonal closure provisions;
3. Waste Management Plan;

The following will be submitted separately:

4. Camp Operations and Management Plan; and

5. Completed Supplemental Information Guideline for Mineral Exploration / Remote Camp.

These documents are intended to supplement and clarify the original application and to ensure consistency with the General Water Licence Application.

R-02 – Water sources, water use measurement, lake drawdown monitoring and extraction methods

6106 acknowledges CIRNAC's request for additional detail regarding potential water sources, withdrawal limits, extraction methods, water use tracking and cumulative water use.

Final water source selection will be made in the field based on proximity to the final camp and drill areas, suitability of the waterbody, avoidance of sensitive areas, and confirmation that the waterbody is capable of supporting the proposed withdrawal. Potential water sources will be identified on an updated map, and final coordinates will be provided to the NWB and Inspector before use.

Water withdrawal volumes will be measured using a flow meter or, where appropriate, calculated using pump rate and operating hours, with daily water use recorded in a field log. Intake locations will be selected to minimize shoreline disturbance. Pumps and fuel will be managed with appropriate setbacks and secondary containment. All intakes will use DFO-compliant fish screens.

6106 is not aware of other operators using the same local waterbodies for the proposed program. However, 6106 will monitor field conditions and adjust water sources if cumulative withdrawal concerns are identified.

R-03 – Waste quantification, wastewater and sump management

6106 will provide estimated daily waste volumes in the updated Waste Management Plan and application addendum.

Greywater and drill cuttings will be managed in accordance with licence conditions and applicable guidance. 6106 confirms that greywater sumps, drill cuttings sumps and any land-based disposal locations will be located at least **31 metres** from the ordinary high water mark of any waterbody and will be sited to avoid direct drainage to water.

Non-hazardous solid waste will be segregated and removed from site or managed in accordance with the Waste Management Plan. Hazardous waste, waste oil, fuel containers and contaminated materials will be stored in appropriate containers and backhauled to an approved facility.

R-04 – Environmental impacts related to water and waste; historical or archaeological sites and prior disturbance

6106 will provide additional water and waste specific impact discussion in the updated application materials.

Potential effects are expected to be temporary, localized and low magnitude, and relate mainly to water withdrawal, greywater management, drill cuttings management, fuel handling and general camp waste. Mitigation will include screened intakes, water use tracking, appropriate setbacks, secondary containment, spill response procedures, segregation and backhaul of wastes, and inspection of sumps and fuel storage areas.

6106 has completed desktop review work for known archaeological or historical sites and will use local knowledge, site inspection and avoidance procedures when selecting final camp and drill locations. If any archaeological or heritage material is encountered, work will stop in the immediate area, the location will be avoided, and the appropriate authorities will be notified.

6106 acknowledges CIRNAC's comment regarding potential inherited liability. Final camp conditions will be documented before establishment. 6106 will avoid areas of obvious prior contamination or disturbance where practicable and will report any material pre-existing environmental concerns identified during field activities.

R-05 – Conflicting proposed timeline

6106 acknowledges the inconsistency identified by CIRNAC.

The April 2026 date in the original application was an indicative seasonal exploration start date and should not be read as the commencement of Type B Water Licence activities before licence issuance. Activities requiring the Type B Water Licence (ie Diamond Drilling) will not commence until the licence is issued and all applicable conditions are satisfied.

The corrected schedule is that camp construction, water use and waste disposal under the Type B Water Licence will commence only after issuance of the licence, anticipated during the 2026 field season, subject to NWB approval and field conditions.

Any activities conducted before issuance of the Type B Water Licence will be limited to activities authorized separately and not requiring Type B water use or waste disposal approval.

R-06 – Missing information in application form

6106 will provide the missing information identified by CIRNAC.

The application submission date is confirmed as **April 8, 2026**.

6106 will provide the NIRB screening determination information and attach the relevant NIRB documentation for Block 8.

6106 will also complete Block 10 regarding alternatives considered. Alternatives considered include alternative camp locations, alternative water sources, continued Arviat-based operations without a camp, and alternative waste management approaches.

The preferred approach was selected to reduce aircraft exposure, improve safety and efficiency, minimize ground disturbance, use local water sources responsibly, and keep the temporary exploration footprint as small as practicable.

Outstanding water licence fees

6106 will confirm with the Nunavut Water Board that any outstanding water licence fees have been paid in full and will provide confirmation or receipt as applicable. These details will be provided by credit card over the phone.

Based on the above responses and the supplemental materials to be provided, 6106 Resources respectfully submits that the comments raised by DFO and CIRNAC have been addressed or can be addressed through the updated application materials and standard licence conditions.

Regards,

Eric Sondergaard
6106 Resources Limited

[Quoted text hidden]

3 attachments

 **6106 Resources Ltd. Hook Lake Project --Wildlife Mitigation Plan10012025.zip**
1852K

 **6106 Resources. Hook Lake-Fuel Spill Contingency Plan 10022025.zip**
3647K

 **6106 Resources Hook Lake Project -Abandonment and Restoration Plan-10032025.zip**
621K