



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

Your file - Votre référence
2BE-HLP
Our file - Notre référence
GCDocs#147064019

May 27, 2026

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 Application for the Hook Lake Project, Type B Water Licence No. 2BE-
HLP.**

Dear Richard,

Thank you for the May 7, 2026 invitation to review the referenced licence 2BE-HLP, submitted by Denise Lockett on behalf of Eric Sondergaard from 6106 Resources Limited, for Type B Water Licence No. 2BE-HLP.

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* and provides the following Technical Review Memorandum for the Board's consideration.

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 (873) 800-5240 or Pauline.Firmin@rcaanc-cirnac.gc.ca or Andrew Keim at (867) 975-4550 or Andrew.Keim@rcaanc-cirnac.gc.ca.

Sincerely,

Pauline Firmin

Pauline Firmin, M. Sc,
Regional Coordinator

Technical Review Memorandum

Date: May 27, 2026

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

From: Pauline Firmin – Regional Coordinator, CIRNAC

Subject: **Crown-Indigenous Relations and Northern Affairs Canada’s Review of the Licence Application for the Hook Lake Project, Type B Water Licence No. 2BE-HLP.**

Region: ☐ Kitikmeot ☒ Kivalliq ☐ Qikiqtani

A. BACKGROUND

The Hook Lake Project is a proposed mineral exploration program located within the Kivalliq Region of Nunavut, approximately 140 kilometres northwest of the Hamlet of Arviat, within the Rankin–Ennadai greenstone belt, one of the largest greenstone belts in Canada. The project area includes both Crown land and Inuit Owned Land (IOL), encompassing parcels AR-16, AR-23, WC-10, and RI-23.

The proponent, 6106 Resources Limited, is a Calgary-based exploration company and a subsidiary of Manhattan Corporation. During the 2025 field season, exploration activities—including helicopter-supported surface sampling and geological observations—were conducted from Arviat without the establishment of a field camp, and without associated water use or waste disposal.

The current proposal involves continued mineral exploration activities, including diamond drilling, electromagnetic surveys, ground and airborne geophysics, prospecting, and sampling, supported by the establishment of a small, temporary exploration camp accommodating up to 20 persons. The camp would operate seasonally, generally from spring through fall, and would be inactive during winter months. While a specific camp location has not yet been finalized, several potential locations have been identified near surface water bodies, with final siting to be informed by local knowledge and subsequent regulatory notification. To support these activities, the proponent has applied for a Type B Water Licence for water use and waste disposal.

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
R-01	Missing Management Plans and Supplemental Information Guidelines (SIG)
R-02	Missing Information On Water Sources, Water Use Measurement, Monitoring Of Lake Drawdown And Method Of Extraction.
R-03	Missing Information On Waste Quantification And Waste Water And Sumps Management
R-04	Missing Description Of Environmental Impact Linked To Water And Waste And Studies Or Survey
R-05	Conflicting Proposed Timeline
R-06	Missing Information In the Application Form

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
General Water Licence Application (Application for a new Water Licence)	6106 Resources Limited, No date
Hook Lake Project Possible Camp Location Map	Unknown, No date
Hook Lake Project Regional Map	Unknown, No date
Community Consultation / Communication Log- 6106 Resources – Hook Lake Project	6106 Resources Limited, April 8, 2026

C. RESULTS OF REVIEW

1. Missing Management Plans and Supplemental Information Guidelines (SIG)

Comment:

CIRNAC notes that no management plans were submitted along with the water licence application, and that a Supplemental Information Guideline (SIG) for Mineral Exploration / Remote Camp does not appear to have been filed. Several elements typically addressed through management plans and the SIG were also not identified in other supporting documentation.

The requirement for supplemental information as part of the Water Licence Application is outlined in section 6 and 7 of Guide 4 : Completing and Submitting a Water Licence Application for a New Licence, Nunavut Water Board, July 2015.

CIRNAC notes that the provision of such information would assist in the evaluation of potential effects and in determining whether additional details may be required to inform water licence conditions.

Recommendation:

(R-01) CIRNAC recommends that the applicant provide more information to support the assessment of the application. Without limiting the scope of information that may be required, this could include, but is not limited to, the following:

- A Spill Contingency and fuel Management Plan;
- A Closure and Reclamation Plan, including provisions for interim or seasonal closure;
- A Waste Management Plan;
- An Operations and Management Plan for camp infrastructure;
- The Supplemental Information Guideline (SIG) for Mineral Exploration / Remote Camp (MM1), with responses to the information requirements outlined therein.

CIRNAC recommends that the applicant ensure all pertinent required information as outlined in the SIG is presented and consistent with what is indicated in the General Water Licence Application.

2. Missing Information On Water Sources, Water Use Measurement, Monitoring Of Lake Drawdown And Method Of Extraction.

Comment:

CIRNAC notes that in the Water Licence Application, the proposed water source is described as “nearby water sources that do not freeze to the bottom”, that water quality and available capacity are described as “potable water for camp use, regular lake water for drilling purposes” and that the estimated quantities of water to be used from each source are identified as “unknown at this time” (Water Licence Application, Block 12). CIRNAC recognizes that the nature of mineral exploration can make early identification of precise water sources challenging; however, the absence of information on potential water bodies, methods for assessing sustainable withdrawal limits, extraction methods, and potential cumulative use limits the ability to assess whether proposed withdrawals could be supported without adverse effects.

Recommendation:

(R-02) CIRNAC recommends that the applicant provide additional clarification to support the review of water use and sustainability such as:

- A list of potential lakes or watercourses that may be used as water sources;
- Information on the approach to assessing sustainable withdrawal limits, such as under-ice lake volume or streamflow considerations, to ensure withdrawals remain within accepted thresholds;
- Further details on water extraction methods, including the type of pump to be used, intake placement, and measures to minimize shore disturbance;
- Information on how water withdrawal volumes would be metered and tracked during operations; and
- Clarification on whether other operators or activities in the area may use the same water bodies, and how potential cumulative effects on water availability may be considered.

CIRNAC notes that such clarification would assist in evaluating potential effects associated with water use and support the development of appropriate licence conditions.

3. Missing Information On Waste Quantification And Waste Water And Sumps Management

Comment:

CIRNAC notes that the quantities of waste generated, expressed in cubic metres per day, are not provided in Block 15 of the Water Licence Application.

In addition, Block 13 indicates that greywater and drill solids would be disposed of in a natural sump located “further than 30 metres from the natural high water mark.” CIRNAC notes that this setback distance is typically identified as 31 metres, and that the absence of waste volume estimates and clarity on disposal setbacks limits the ability to assess potential effects associated with waste disposal and to support the development of appropriate licence conditions.

Recommendation:

(R-03) CIRNAC recommends that the applicant clarify the waste management information provided in the application. This could include, but is not limited to:

- Estimated daily volumes (m³/day) for each waste stream identified in Block 15; and
- Confirmation of the intended setback distance of 31 metre for greywater and drill solids disposal locations in relation to the natural high water mark.

CIRNAC notes that this clarification would assist in evaluating potential effects associated with waste disposal and in informing the Nunavut Water Board’s review of the application.

4. Missing Description Of Environmental Impact Linked To Water And Waste And Studies Or Survey

Comment:

CIRNAC notes that Block 17 (Predicted Environmental Impacts of Undertaking and Proposed Mitigation Measures) states that “every effort including implementing the KIA Caribou Conservation Measures and working with the Arviat Hunters and Trappers Organization will be made to ensure minimal impact to wildlife and the environment.” While this information is relevant to wildlife considerations, it does not describe the predicted direct, indirect, or cumulative impacts related specifically to water use and waste disposal, as requested in Block 17 of the Water Licence Application.

CIRNAC also notes that Block 23 (Studies Undertaken to Date) indicates that no studies have been undertaken at this time. In addition, no indication was made as to how the potential presence of historical sites, previous liability and previous disruption to the area proposed will be considered when choosing where to establish camp.

The absence of water- and waste-specific impact information, together with the lack of supporting studies, limits the ability to understand potential effects on surface water and receiving environments.

Recommendation:

(R-03) CIRNAC recommends that the applicant clarify whether additional information is available to describe:

- The predicted direct, indirect, and cumulative environmental effects related specifically to water use and waste management, and associated mitigation measures; and
- Whether the applicant has considered the potential presence of historical or archaeological sites, previous liability and previous disruption in areas proposed for camp establishment or exploration activities, including whether any studies, assessments, or consultations have been undertaken or are planned to address this consideration.

CIRNAC notes that such clarification would assist in evaluating potential effects associated with the proposed activities and support the Nunavut Water Board's review of the application. CIRNAC also wishes to make the proponent aware that they will inherit liabilities present on site upon the establishment of the camp.

5. Conflicting Proposed Timeline**Comment:**

CIRNAC notes that Block 24 (Proposed Time Schedule) of the Water Licence Application indicates that construction is proposed to commence on May 7, 2026, while operations are proposed to begin in April 2026, which is inconsistent. CIRNAC also notes that Block 25 (Proposed Term of Licence) states that the requested date of issuance for a Type B water licence must be at least three months from the date of application, and that the application was submitted on April 8, 2026.

Recommendation:

(R-03) CIRNAC recommends that the applicant clarify the proposed construction and operation start dates and confirm how the project schedule aligns with the anticipated timing of water licence issuance, to support the review of whether proposed activities are consistent with regulatory timelines.

6. Missing Information In the Application Form**Comment:**

CIRNAC notes that the Water Licence Application does not appear to contain all required information necessary to support review. Specifically, the Application Submission Date is

not indicated; Block 8 (NIRB Determination) does not include the date issued or an attached copy of the determination; and Block 10 (Options) has not been completed. The absence of this information limits the ability to confirm the regulatory status of the project and to understand alternative methods or locations that may have been considered, as required in the application form (Water Licence Application, Blocks 1, 8, and 10).

Recommendation:

(R-03) CIRNAC recommends that the applicant clarify whether the missing information can be provided, including confirmation of the application submission date, details and documentation related to the NIRB determination referenced in Block 8, and information addressing the alternatives section in Block 10, to support a complete review of the application.