



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#148272218

July 2, 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 Response to
Applicant Reply to Comments of the Licence Application for the Hook Lake
Project, Type B Water Licence No. 2BE-HLP.**

Dear Robert,

Thank you for the June 17, 2026 invitation to review the Applicant's reply to comments of 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.

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

Table 1: Summary of Recommendations

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

A. 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
Abandonment And Restoration Plan	6106 Resources Limited, October 1, 2025
Fuel Spill Contingency Plan	6106 Resources Limited, October 1, 2025
Waste Management Plan	6106 Resources Limited, June 2026

B. 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.

Proponent Response:

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.

Response to Reply:

CIRNAC thanks 6106 Resources for the supplemental materials.

CIRNAC notes that the Hook Lake Project Waste Management Plan states that hazardous and potentially hazardous wastes will be managed using secondary containment where required (Section 5), and further references secondary containment for fuel and hazardous materials as part of the project's waste management infrastructure (Section 11).

However, CIRNAC was unable to identify mentions within the Fuel Spill Contingency Plan describing how secondary containment will be incorporated into fuel storage. Secondary containment for fuel containers is paramount to minimize the risk of fuel releases to land and water and in evaluating the effectiveness of proposed spill prevention measures. CIRNAC recommends that secondary containment be explicitly mentioned as a part of the Fuel Spill Contingency Plan.

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.

Proponent Response:

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.

Response to Reply:

CIRNAC thanks the proponent for the additional information provided.

CIRNAC acknowledges that the final camp location has not yet been determined and that the proponent has committed to identifying water sources and providing final coordinates prior to use. However, no preliminary list or map of potential water sources within the prospective camp and exploration areas was provided. While CIRNAC recognizes that mineral exploration programs often require flexibility in final water source selection, the intent of the request was to obtain information on likely water sources under consideration to support an assessment of whether available waterbodies are capable of sustaining the proposed water demand.

In addition, CIRNAC acknowledges the proponent's commitment to confirm that selected waterbodies can support the proposed withdrawals; however, no information was provided regarding the methodology that will be used to assess waterbody capacity and determine whether planned withdrawals are protective of the water source and consistent with accepted practices by the Nunavut Water Board.

CIRNAC is reiterating its recommendation that additional information is provided regarding potential water sources and the methodology that will be used to evaluate sustainable withdrawal limits.

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.

Proponent Response:

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 **31metres** 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.

Response to Reply:

CIRNAC thanks the Proponent for the confirmation that the 31 metres setback from the ordinary high water mark of water bodies will be respected for greywater sumps, drill cuttings sumps, and land-based disposal locations.

CIRNAC thanks the Proponent for the provided Waste Management Plan, which contains the estimated waste volume for greywater generation. However, CIRNAC's recommendation requested estimated volumes for each waste stream identified in Block 15, and that information regarding sewage, hazardous waste, waste oil, and sludge is not present. Waste volume estimates are important, as they support assessment of whether the Waste Management Plan is adequate for the volume and type of waste to be generated.

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.

Proponent Response:

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.

Response to Reply:

CIRNAC thanks the proponent for the additional information and for their commitment to mitigation measures, such as 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. CIRNAC also thanks the proponent for their commitment toward archaeological or historical sites, and their acknowledgment of previous liability. CIRNAC recommends that the board ensure that appropriate mitigation measures are present as conditions of the licence.

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.

Proponent Response:

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.

Response to Reply:

CIRNAC thanks the proponent for the additional information regarding the application submission date.

CIRNAC thanks the proponent for their commitment to update NIRB screening determination information and NIRB documentation for Block 8, and the alternative considered for Block 10. CIRNAC recommends the Nunavut Water Board ensure that the information is provided prior to the issuance of the Water Licence.