NWB Tools

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

2BE-HLP---- New Application - CIRNAC Response to 6106 Reply

Eric Sondergaard <eric@6106.ca> Sun, Jul 5, 2026 at 5:21 PM
To: Robert Hunter <robert.hunter@nwb-oen.ca>
Cc: Denise Lockett <lockettda@telus.net>, Abid Jan <abid.jan@nwb-oen.ca>, Licensing Department <licensing@nwb-oen.ca>

Dear Robert,

6106 Resources Limited thanks the Nunavut Water Board and CIRNAC for the continued review of the Hook Lake Project Type B Water Licence application.

6106 has reviewed CIRNAC's July 2, 2026 response to the Applicant's reply to comments. We understand the remaining comments to be limited to the matters identified in CIRNAC's **"Response to Reply"** sections. This response is provided strictly in relation to the Type B Water Licence process and the water-use and waste-disposal matters under review by the Nunavut Water Board.

R-01, Secondary containment in Fuel Spill Contingency Plan

CIRNAC noted that the Waste Management Plan references secondary containment for fuel and hazardous materials, but that similar wording was not clearly identified in the Fuel Spill Contingency Plan.

6106 confirms that fuel, waste oil, lubricants and hazardous materials will be stored and handled using appropriate secondary containment, as applicable. This may include lined berms, insta-berms, spill trays, drip trays, sealed containers or equivalent containment measures depending on the material, location and activity.

Fuel drums and fuel caches will be stored in appropriate secondary containment where required. Active drums, pumps, generators and fuel transfer points will use drip trays or equivalent local containment during operation. Spill kits will be maintained at fuel storage areas, active fuel transfer locations, drill areas and camp.

Where fuel-powered pumps are used for water withdrawal, the pump and fuel containers will be managed to minimize shoreline disturbance and prevent releases to water. Refuelling will not occur over water.

6106 can update the Fuel Spill Contingency Plan to expressly include this secondary containment language if requested by the NWB or required as a condition prior to licence issuance.

R-02, Potential water sources and sustainable withdrawal methodology

CIRNAC noted that no preliminary list or map of potential water sources was provided, and requested additional information regarding potential water sources and the methodology to be used to evaluate sustainable withdrawal limits.

6106 has attached a KML file identifying the proposed water source area for camp use. The final water source selection will be confirmed in the field based on proximity to the final camp location, waterbody suitability, safe access, and confirmation that the waterbody is capable of supporting the proposed withdrawal.

Final source coordinates will be provided to the NWB and Inspector prior to use, if required.

Before withdrawing water from any source, 6106 will:

1. confirm that the proposed source is of sufficient size and depth to support the planned use;
2. avoid shallow waterbodies that may freeze to bottom or show evidence of limited capacity;
3. where winter or ice-covered withdrawal is required, water depth will be tested with an auger and will apply a conservative withdrawal limit consistent with accepted northern practice, including limiting withdrawal to no more than 10% of available under-ice water volume unless otherwise approved;
4. where open-water withdrawal is used, monitor for visible drawdown or shoreline effects and reduce, rotate or discontinue use if drawdown concerns are observed;
5. use DFO-compliant fish screens on all water intakes;
6. place intakes to minimize disturbance to banks, shorelines and lakebed sediments;
7. meter water withdrawals using a flow meter, or calculate volumes using pump rate and operating hours where metering is not practicable;

8. record daily water use in a field log, including source, estimated or metered volume, purpose of use and any observed concerns; and
9. rotate or change sources if field conditions, cumulative withdrawal or waterbody capacity indicate that continued use is not appropriate.

6106 is not aware of other operators using the same local waterbody for the proposed program. If other use is identified during field operations, 6106 will consider cumulative withdrawal in source selection and adjust water use accordingly.

R-03, Waste volume estimates

CIRNAC noted that the Waste Management Plan provided an estimate for greywater generation, but did not include estimated volumes for sewage, hazardous waste, waste oil and sludge.

6106 provides the following planning-level estimates for the proposed temporary exploration program. Actual volumes will vary depending on camp occupancy, drilling activity and final camp configuration.

Domestic solid waste is expected to be up to approximately 0.5 cubic metres per day. Waste will be segregated, stored securely, and backhauled or otherwise managed in accordance with the Waste Management Plan and licence conditions.

Food waste is expected to be up to approximately 0.5 cubic metres per day. Food waste will be stored in sealed containers and backhauled or managed in accordance with the approved Waste Management Plan.

Greywater is expected to be up to approximately 5 cubic metres per day, depending on camp occupancy. Greywater will be discharged only to an approved greywater sump located at least 31 metres from the ordinary high water mark and sited to avoid direct drainage to water.

Sewage and sanitary waste will not be discharged directly to water. Sanitary waste will be managed through the camp toilet system and containerized, treated, incinerated or backhauled in accordance with the Waste Management Plan and licence conditions. Planning-level sanitary waste or sludge volumes are expected to be up to approximately 0.25 cubic metres per day, depending on occupancy and the final camp system used.

Hazardous waste, including oily rags, used absorbents, filters, batteries, aerosols and chemical containers, is expected to be less than approximately 0.1 cubic metres per day. Hazardous waste will be stored in labelled containers, within secondary containment where appropriate, and backhauled to an approved facility.

Waste oil is expected to be less than approximately 0.1 cubic metres per day and will be stored in sealed drums or approved containers within secondary containment and backhauled to an approved facility.

Drill cuttings are expected to be up to approximately 1 cubic metres per day per active drill rig, depending on drilling method, hole diameter and daily metres completed. Drill cuttings will be managed in land-based sumps or other approved locations at least 31 metres from the ordinary high water mark, sited to avoid direct drainage to water, and reclaimed in accordance with licence conditions.

All volumes are planning estimates. Actual waste volumes will be tracked during operations, and waste backhaul records, manifests and inspection records will be maintained.

6106 can update the Waste Management Plan to include these waste-volume estimates if requested by the NWB or required as a condition prior to licence issuance.

R-04, Environmental effects related to water and waste

6106 notes that CIRNAC has identified this item as resolved with comments.

6106 confirms its commitments to screened intakes, water-use tracking, appropriate setbacks, secondary containment, spill response procedures, segregation and backhaul of waste, and inspection of sumps and fuel storage areas.

Potential water- and waste-related effects are expected to be temporary, localized and low magnitude. Proposed mitigation measures are intended to prevent adverse effects to water quality and the receiving environment.

R-06, Application form information

6106 notes that CIRNAC has thanked the proponent for the additional application submission date information and has recommended that the NWB ensure the remaining Block 8 and Block 10 information is provided prior to issuance of the Water Licence.

6106 confirms the application submission date as April 8, 2026.

6106 will provide the NIRB screening determination information and relevant documentation for Block 8, if not already on the NWB record.

For Block 10, 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 improve safety and operational efficiency, minimize unnecessary aircraft movements, use local water sources responsibly, and keep the temporary exploration footprint as small as practicable.

If there are any outstanding items, please let me know.

Eric Sondergaard

6106 Resources Limited

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