



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

Your file - Votre référence
2BE-IZO2328
Our file - Notre référence
GCDOCS#143851557

February 23, 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 Amendment and Renewal Application for IZOK project, Type B Water
Licence No. 2BE-IZO2328**

Dear Richard Dwyer,

Thank you for the 22 January 2026 invitation to review the amendment and renewal application, submitted by MMG Resources Inc., for Type B Water Licence No. 2BE-IZO2328.

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.

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 William Quere at william.quere@rcaanc-cirnac.gc.ca Or Andrew Keim at (867) 975-4550 or Andrew.keim@rcaanc-cirnac.gc.ca

Sincerely,

William Quere, BSc
Municipal Coordinator



Technical Review Memorandum

Date: 23 February 2026

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

From: William Quere – Municipal Coordinator, CIRNAC

Subject: **Crown-Indigenous Relations and Northern Affairs Canada’s Review of the Licence Amendment and Renewal Application for IZOK project, Type B Water Licence No. 2BE-IZO2328**

Region: Kitikmeot Kivalliq Qikiqtani

A. BACKGROUND

The IZOK Project is located in the Kitikmeot region with a camp location of Latitude: 65° 41’ 11” N Longitude: 112° 52’ 42” W (Ham Lake Camp), around 250 Kilometers south of Kugluktuk. It is owned by MMG Resources Inc. which has conducted Mineral exploration activities including drilling, sampling, prospecting, geological mapping, and geophysical surveys. The project was in care and maintenance since 2015 until it began recommissioning in 2025.

The current renewal and amendment application seeks to include new claims into their licencing as well as continue exploration activities for the foreseeable future. The application intends to extend the licence by 10 years maintaining the water use of 100 m³/day with activities occurring all season. Specifically, their stated goals are to:

-Expand the area of two Nunavut Water Board (NWB) Water Licences (2BE-IZO2328 and 2BE-HIG2328).

- Expand the area of two CIRNAC Land Use Permits (LUPs; N2024C0021 and N2024C0022) .

- Start mineral exploration in CIRNAC mineral claim areas that are outside of the existing NWBs and LUPs areas.

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 Application Answers
R-02	Incineration steps
R-03	Waste Management plan
R-04	Inspection Report
R-05	Spill contingency plan
R-06	Closure and reclamation plan
R-07	Conditions applying to monitoring program

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
2BE-IZO2328 Water Licence	NWB, May 2023
Amendment Cover Letter	MMG, January 2026
Application for Water Licence Amendment	MMG, January 2026
Att 10 Izok Corridor Waste Management Plan	Stantec Consulting, August 2025
Att 11 Certificate Amalgamation	Carol Prest, January 2017
Att 12 Inspections Responses	MMG, December 2024
Att 2 Izok Area Overview	Stantec Consulting, July 2025
Att 3 Izok_Auth letter	MMG, January 2026
Att 4 Leases Permits Authorizations	NA
Att 5 NPC File No. 150635 Izok Corridor Project	NPC, April 2025
Att 6 Izok Non-Technical Summary	NA
Att 7 Izok Corridor Spill Cont Plan	Stantec Consulting, August 2025
Att 8 Izok Corridor Close Rec Plan	Stantec Consulting, August 2025
Att 9 Izok Corridor WMMP	Stantec Consulting, August 2025



C. RESULTS OF REVIEW

1. Missing Application Answers

Comment:

The Application for Amendment of Water Licence 2BE-IZO2328 has missing information in several sections including:

A) Section 22 which asks

“Is the list of the officers of the company the same as those considered in the existing water licence”?

The concern is that there is no answer given leaving uncertainty as to whether the listed officers in the next question are new or the same as on the existing licence.

B) Section 13, when asked to provide the quantity and each purpose for the water use the responses are

“Water Licence 2BE-IZO2328 permits the withdrawal of water from Ham Lake for camp use and from “sources proximal to drilling targets” for “drilling and associated uses”, which may include Ham Lake. No significant changes to quantities of water to be used from each source are anticipated and total water usage under this licence would remain limited to a maximum of 100 m³ /day”.

“No changes to the estimated quantities for each purpose are being requested.”

The concern is that the quantity and purpose is required to assess water needs for the project and this cannot be done without the requested numbers.

C) Section 24, the timeline for ongoing operations and closure is unclear as there is no end date for operations proposed.

The concern is that without a full application it is difficult for CIRNAC to provide a fulsome report

Recommendation:

(R-01) CIRNAC recommends that the applicant provide the missing information above.



2. Incineration Steps

Comment:

Section 4.1.1 of the Waste Management Plan states that

“Combustible wastes will be collected for incineration. Incineration is an effective method of disposal of combustible wastes that reduces the transportation volume for off-site waste management facilities. Additionally, it assists in avoiding human-wildlife interactions. Following steps outlined in the Technical Document for Batch Waste Incineration (Environment Canada, 2010), and guidance provided in the Nunavut Environmental Guideline for the Burning and Incineration of Solid Waste (Government of Nunavut, 2010a), the wastes will be incinerated. Residues from the incinerator will be managed as non-combustible wastes”.

The concern is that steps for incineration on this project are not given and the incinerator is not described.

Recommendation:

(R-02) CIRNAC recommends that the applicant provide information on the incinerator, steps for its incineration process, specify which wastes will be incinerated, and detail how the ash from the incinerator will be stored and removed.

3. Waste Management plan

Comment:

The waste management plan includes a section on hazardous waste which states

“Hazardous wastes will be collected, sealed in drums, and removed from site for proper disposal in Yellowknife, NT. Wastes will be stored in a manner that prevents access by wildlife. Hazardous wastes management will follow the Nunavut Guideline for General Management of Special and Hazardous Waste (Government of Nunavut, 2010b). Transportation of hazardous wastes will be in accordance with Environment and Climate Change Canada’s (ECCC’s) regulations Cross-border Movement of Hazardous Waste and Hazardous Recyclable Material Regulations (Government of Canada, 2021), and Transport Canada’s Transportation of Dangerous Goods Regulations (Government of Canada, 2001)”.

Stating a given guideline rather than a project specific plan is inadequate. The concern is the combustible and hazardous waste plans do not provide enough detail to ensure this project is and will be compliant with regulation.



Recommendation:

(R-03) CIRNAC recommends that the applicant provide greater detail in the waste management plan as to steps they will take to dispose of their waste. This includes describing methods mentioned in other plans such as backhauling, open air burning, incineration, and sump construction with maintenance. CIRNAC recommends to detail waste storage and provide safety measures (filtering, wildlife measures, containment, etc.) taken and planned to ensure protection of water sources from waste. CIRNAC recommends the applicant ensures all waste is not stored within 31 m of the ordinary high water mark of any water body.

4. Inspection Report

Comment:

The water licence inspection in the Inspections Responses document indicated some concerns from the CIRNAC inspector including

“failed secondary containment/no cover on secondary containment that is holding fuel”.

The applicant gave a timeline in their response to this concern but there is nothing in the package confirming these actions have been carried out.

Recommendation:

(R-04) CIRNAC recommends that the applicant confirm if these concerns have been rectified.

5. Spill Contingency Plan

Comment:

In section 13.3.2 of the Spill Contingency Plan, a response to spill action for Motor Oil, Hydraulic Oil, and Transmission Fluid is stated that

“A small amount can be incinerated”.

The concern is that this goes against incineration guidelines unless specialised equipment is used and no specifics for the incinerator are given in either the spill contingency plan or the waste management plan.



Recommendation:

(R-05) CIRNAC recommends that motor oil, hydraulic oil, and transmission fluid are not incinerated unless capable equipment is used.

6. Closure and Reclamation Plan

Comment:

The current water licence requires in part B that

“A description of all progressive and or final reclamation work undertaken, including photographic records of site conditions before, during and after completion of operations”.

The concern is that adequate documentation is not included in the closure and reclamation plan. The closure and reclamation plan also makes no mention of the required long-term monitoring post closure. The concern is that the site will not be monitored post closure to the point of chemical and physical stability.

Recommendation:

(R-06) CIRNAC recommends the applicant include in their Closure and Reclamation plan, and in any other relevant plan or application, mention of post closure monitoring to the point of chemical and physical stability of the site.

7. Conditions applying to monitoring program

Comment:

In the water licence Part J describes conditions applying to the monitoring program which states that

“The Licensee shall obtain representative samples of the Water column below any ice where required under Part F, Item 5 and 6. Monitoring shall include but not be limited to the following: Total Suspended Solids pH Electrical Conductivity, Total Trace Metals as determined by a standard ICP Scan (to include at a minimum, the following elements: Al, Sb, Ba, Be, Cd, Cr, Co, Cu, Fe, Pb, Li, Mn, Mo, Ni, Se, Sn, Sr, Tl, Ti, U, V, Zn), and Trace Arsenic and Mercury”

The concern is that a plan to facilitate this sampling is not found within the application or attachments.

Recommendation:

(R-07) CIRNAC recommends the applicant provide a plan or contingency to sample the required water if such a need should rise.