



Water Resources Division
Resource Management Directorate
Nunavut Regional Office
918 Nunavut Drive
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Your file - Votre référence
2BE-IZO2328
Our file - Notre référence
GCDOCS#143851557

March 24, 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 response to comments for IZOK project, Type B Water Licence No. 2BE-IZO2328

Dear Richard Dwyer,

Thank you for the 13 March 2026, invitation to review the response to comments on 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
Regional Coordinator

Canada 



Technical Review Memorandum

Date: 24 March 2026

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

From: William Quere – Regional Coordinator, CIRNAC

Subject: **Crown-Indigenous Relations and Northern Affairs Canada’s Review of the Licence Amendment and Renewal Application response to comments 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 | Waste Management plan |
| R-02 | 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. Waste Management plan

CIRNAC Recommendation:

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.

MMG Response:

The Waste Management Plan will be updated to include additional detail on waste identification, classification, handling, and storage management. The update will provide clarity for identifying hazardous waste and special wastes, consistent with applicable territorial and federal regulatory requirements.

Wastes will be stored in appropriate containers, with preference for steel drums and plastic totes. Wastes will not be mixed. MMG will ensure all waste is stored greater than 31 m from the high water mark of all water bodies and will implement secondary containment measures for all hazardous and special wastes. Secondary containment located in unsheltered (outdoor) areas will be covered with tarps or similar material to prevent secondary containment from filling with precipitation.

A summary table of applicable regulations, including the Nunavut Guideline for General Management of Special and Hazardous Waste (Government of Nunavut, 2010b), 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), will be included in the update. The table will identify the applicable document and summarize actionable items.

Waste management procedures will be updated to provide clear guidance on packaging, labelling, and shipping of materials that will be transported off-site for final disposal at an appropriate waste management facility. End of season waste removal requirements will be considered when planning field operations in accordance with applicable regulations. As noted above, an Incinerator Management Plan will be developed to better define acceptable waste streams for incineration, outline detailed procedures for incineration, and clarify documenting requirements.



The Waste Management Plan, including the new incineration procedures and clear waste handling guidance, will be updated before exploration operations begin in 2026.

CIRNAC Reply:

(R-01) CIRNAC is satisfied with the responses provided that **all** CIRNAC recommendations to the waste management plan are included in the coming update. CIRNAC expects all plans and updates to be sent to the NWB a minimum of 30 days prior to any change, as required by Part B-3 of the Licence.

2. Conditions applying to monitoring program

CIRNAC Recommendation:

CIRNAC recommends the applicant provide a plan or contingency to sample the required water if such a need should rise.

MMG Response:

No drilling through ice is currently planned. Management plans and standard operating procedures are reviewed annually, and updated to reflect planned activities, including drilling on ice. A procedure will be developed to address this sampling if required.

CIRNAC Reply:

(R-02) CIRNAC is satisfied with this response, so long as MMG submits the plan to the NWB a minimum of 30 days before any anticipated on-ice drilling, as required by Part B-3 of the Licence.