

Robin lkkutisluk <robin.ikkutisluk@nwb-oen.ca>

Kiggavik Artesian Compliance

3 messages

STUMBORG Naomi (AREVA Resources CANADA) <naomi.stumborg@areva.ca>

Wed, Mar 4, 2015 at 1:13 PM

To: "Sean Joseph (sean.joseph@nwb-oen.ca)" <sean.joseph@nwb-oen.ca>

Cc: "Phyllis Beaulieu (phyllis beaulieu@nwb-oen.ca)" <phyllis beaulieu@nwb-oen.ca>, "Robin Ikkutisluk (robin ikkutisluk@nwb-oen.ca)" <robin.ikkutisluk@nwb-oen.ca>, "ROBBINS John (AREVA Resources Canada)" < John.Robbins@areva.ca>, "BLAIN Mario (AREVA Resources Canada)" <Mario.Blain@areva.ca>, "FORSEILLE Stephanie (AREVA Resources Canada)" <Stephanie.Forseille@areva.ca>

Hi Sean,

As I prepare this amendment request, I have some questions for you below:

- 1. Block 11 do we need to provide information in accordance with the Supplemental Information Guidelines (SIG)?
 - If we do have to provide the information, how do I complete this when the SIG for Mining and Milling undertakings (MM1 and MM2) are only in draft form? These weren't completed in the renewal application submitted in 2012 or the amendment application in 2011. According to Guide 7, the completion of SIG forms depend on the scope of the project:

Depending upon the scope of the project and the classification of undertaking, the licensee may also be required to provide supplemental information that addresses a Supplemental Information Guideline(s) (SIG). Even if information in respect of an SIG(s) was provided upon application for the original licence, the Board requires the licensee to submit updated information addressing the SIG. Legislation, policies, best management practices and the information needs of both the Board and other parties may all change over time. Requirements and plans that were previously accepted may no longer reflect current conditions.

- 2. Block 23 I am to contact you regarding licence specific direction in completing the compliance assessment and status report. AREVA has provided a summary of compliance actions in the annual report. The non-compliance identified by AANDC relates to the non-mineralized drill cuttings spill that was reported last July. Do you require anything further than the spill report and annual report already on file to process this amendment application?
 - "Provide a compliance assessment and status report including a response to any inspector's reports. The licensee must contact the NWB for licence specific direction in completing the assessment and report. If in non-compliance, a licence may not be issued until compliance is achieved. If in non-compliance, attach plans/reports for consideration. Application will not be processed if significant issues of non-compliance exist."
- 3. In addition to clarifying the artesian condition and background section to "Kiggavik Project", do you recommend also taking this opportunity to correct the items below?
 - Page 7 incorrectly uses 300 m³/day, but later uses the correct amount of 299 m³/day in Part C item 1
 - Part F Item 7 (Page 15) This was achievable previously during activities specific to mine development where pneumatic packer testing and installation of thermistors was completed. I would like to remove this condition as we do not record permafrost depths during exploration drilling.
 - i. "Where drilling activity has penetrated below the permafrost layer, the NWB request that the proponent record the depth of permafrost and location of the drill hole to be included with the Annual Report"
 - Part J Item 4 (Page 18) I would like to remove this condition. We previously addressed this with follow-up sampling that determined the initial sampling was subject to error. The camp water supply referenced under 2BE-KIG0708 was resampled on June 27, 2009 and showed no traces of grease or oil. I believe the attached results were provided, but I may be wrong.
 - i. "The Licensee shall provide follow-up monitoring and analytical results of the potable water supply previously utilized under previous Licences, in order to assess the oil and grease contamination during the Licence term and investigate the source of contamination and possible mitigation measures required. Plans to address this matter shall be submitted to the NWB within the Annual Report as required by Part B Item 2.

Thanks again for your help,

Naomi Stumborg

Exploration SHEQ Supervisor

AREVA Resources Canada Inc.

Tel: (306) 343-4035 Fax: (306) 343-4632

Naomi.Stumborg@areva.ca

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From: STUMBORG Naomi (AREVA Resources CANADA)

Sent: Monday, March 02, 2015 4:33 PM

To: 'Sean Joseph'

Cc: Phyllis Beaulieu; Robin Ikkutisluk; ROBBINS John (AREVA Resources Canada); Mario Blain (Mario Blain (Mari

Resources Canada); ZUNTI Daniel (AREVA Resources Canada)

Subject: RE: Kiggavik Artesian Compliance

Hi Sean,

Thank you for responding to my query. We will file an amendment for the update of the artesian condition to clarify between Kiggavik Project and Kiggavik mineral leases. I understand that Kiggavik lease and Kiggavik Project have been used interchangeably, but appreciate the opportunity to amend the licence for improved clarity regarding the "Kiggavik Project" which includes both the Kiggavik and St. Tropez areas. We will arrange amendment for clarification from Kiggavik Lease to Kiggavik Project.

As outlined below, the scope of the licence currently includes the St. Tropez area. With the exception of the artesian condition, please confirm that we are compliant to drill in the St. Tropez area as it remains in the current scope of the licence. If this interpretation is incorrect, please let me know.

to allow for the use of water and disposal of waste during camp operations and activities related to exploration that include prospecting, geological mapping, diamond drilling at the Kiggavik Project located within the Kivalliq Region of Nunavut, generally located at the geographical coordinates as follows:

Max Latitude: 64° 39' 29" N Max Longitude: 97° 57' 50" W

Min Latitude 64° 17' 02" N Min Longitude: 97° 20' 56" W (Project Extents)

Latitude: 64° 26' 29" N Longitude: 97° 39' 34" W (Existing camp)

Regards,

Naomi Stumborg

Exploration SHEQ Supervisor

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From: Sean Joseph [mailto:sean.joseph@nwb-oen.ca]

Sent: Monday, March 02, 2015 3:49 PM

To: STUMBORG Naomi (AREVA Resources CANADA)

Cc: Phyllis Beaulieu; Robin Ikkutisluk **Subject:** Re: Kiggavik Artesian Compliance

Hi Naomi:

Sorry for not responding to your queries sooner.

Based on the way in which the licence is written, it assumes that the Kiggavik lease or Kiggavik Project (used interchangeably) captured mineral leased for all areas in question including the St. Tropez Area.

Given that the information contained in your email suggests otherwise, the Licence will need to be amended to allow for exploration activities well as drilling under low flow, artesian conditions.

Regards,

Sean

On Wed, Feb 18, 2015 at 2:55 PM, Phyllis Beaulieu <phyllis.beaulieu@nwb-oen.ca> wrote:

This is more of a tech question than admin. Did you provide a response back to Naomi so I can clear this from my backlog?

----- Forwarded message -----

From: STUMBORG Naomi (AREVA Resources CANADA) <naomi.stumborg@areva.ca>

Date: Tue, Feb 3, 2015 at 10:39 AM Subject: Kiggavik Artesian Compliance

To: "Phyllis Beaulieu (phyllis.beaulieu@nwb-oen.ca)" <phyllis.beaulieu@nwb-oen.ca>

Cc: "Sean Joseph (sean.joseph@nwb-oen.ca)" <sean.joseph@nwb-oen.ca>, "ROBBINS John (AREVA Resources Canada)" <John.Robbins@areva.ca>,

"FORSEILLE Stephanie (AREVA Resources Canada)" < Stephanie. Forseille@areva.ca>

Good morning Phyllis,

As outlined in our recent Annual Report submission, we will be drilling a small number of holes in the St. Tropez area this year. To ensure we have the appropriate approvals in place, please provide clarity as to whether our current licence is sufficient. If we require amendment, please let me know at your earliest convenience.

The Kiggavik Project encompasses the Kiggavik mineral leases as well at the St. Tropez claims which will be converted to lease shortly. The ownership on the Kiggavik mineral leases and St. Tropez claims differ, however we are considering all exploration activities out of the Kiggavik Camp as part of the Kiggavik Project. The *Kiggavik lease*, as defined under background, includes the St. Tropez area. This is slightly wrong as the Kiggavik Project exploration includes the mineral leases for all areas, but the Kiggavik mineral leases do not include the St. Tropez area. If the licence remains as currently written, are we allowed to drill through artesian flow if encountered in the St. Tropez area? The licence currently includes the following wording and my primary concern is that the artesian approval is limited to the *Kiggavik lease*.

Background

The Kiggavik Project is a uranium surface exploration project located approximately 80 kilometres west of the Hamlet of Baker Lake. The project consists of the Kiggavik lease, which contains the Kiggavik site to the north and the Sissions site to the south, as well as the St. Tropez claim, located to the north of the Kiggavik site.

 The Licensee is permitted to drill under low flow artesian conditions within all areas encompassed by the Kiggavik Lease provided that appropriate measures are implemented to

prevent induced contamination of groundwater or salinization of surface water and that the Licensee adheres to the following.

- a. The Licensee shall analyze water encountered from the artesian flow to confirm the quality of the water as per Part J, Item 12;
- b. The Licensee shall adhere to the operational and mitigation measures as outlined in the technical support document "Drilling in Low Flow Artesian Conditions" submitted as part of the application dated March 29, 2011.
- c. The Licence shall provide as part of the Annual Report required by Part B, Item 2, information on all artesian flow encountered, with GPS coordinates, dates, and flow rates, depth, permafrost, aquifer and Packer testing data and associated water quality analytical results.

Regards,

Naomi Stumborg

Exploration SHEQ Supervisor

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2 attachments

130614 2BE-KIG1318 Renewal Licence-OSJE.pdf

090627 CampWaterResults NWB PartJ4.pdf

To: "STUMBORG Naomi (AREVA Resources CANADA)" <naomi.stumborg@areva.ca>

Cc: "Phyllis Beaulieu (phyllis.beaulieu@nwb-oen.ca)" <phyllis.beaulieu@nwb-oen.ca>, "Robin Ikkutisluk (robin.ikkutisluk@nwb-oen.ca)" <robin.ikkutisluk@nwb-oen.ca>, "ROBBINS John (AREVA Resources Canada)" <John.Robbins@areva.ca>, "BLAIN Mario (AREVA Resources Canada)" <Mario.Blain@areva.ca>

Hi Naomi:

The responses to your queries are as follows:

1. Block 11 - do we need to provide information in accordance with the Supplemental Information Guidelines (SIG)?

Answer: If AREVA Resources Canada is contemplating only an amendment to Licence 2BE-KIG1318, it does not necessarily have to complete the supplemental information forms, MM1 and MM2, which are still labelled draft. It can submit any relevant supplemental information as part of the summary of its application or using the standard supplemental information form.

Block 23 – I am to contact you regarding licence specific direction in completing the compliance assessment and status report. AREVA has provided a summary of compliance actions in the annual report. The non-compliance identified by AANDC relates to the non-mineralized drill cuttings spill that was reported last July. Do you require anything further than the spill report and annual report already on file to process this amendment application?

Answer: It is recommended that AREVA Resources Canada, indicate in its amendment application that the information requested under Block 23 can be found in the Company's specific Annual Report; however, if the NWB requires additional information relevant to this item during the review process for the proposed amendment(s), it will request such information from the company.

3. In addition to clarifying the artesian condition and background section to "Kiggavik Project", do you recommend also taking this opportunity to correct the items below?

Answer: The NWB can address the item under bullet No.1, minor discrepancy in water use, as part of any amended licence issued to the project.

With respect to bullet Nos. 2 & 3, it is recommended that AREVA Resources Canada include these items as part of its request to amendment the licence. It should be noted that conditions related to the aforementioned items were included in the licence as of previous amendment requests and information provided by the company, and in response to interveners' comments received at the time.

If you have any further questions, please contact me at your earliest convenience.

Regards,

Sean

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STUMBORG Naomi (AREVA Resources CANADA) <naomi.stumborg@areva.ca>

Thu, Mar 5, 2015 at 9:52 AM

To: Sean Joseph <sean.joseph@nwb-oen.ca>

Cc: "Phyllis Beaulieu (phyllis beaulieu@nwb-oen.ca)" <phyllis beaulieu@nwb-oen.ca>, "Robin Ikkutisluk (robin.ikkutisluk@nwb-oen.ca)" <robin.ikkutisluk@nwb-oen.ca>, "ROBBINS John (ÁREVÁ Resources Canada)" < John.Robbins@areva.ca>, "BLAIN Mario (AREVA Resources Canada)" <Mario.Blain@areva.ca>, "FORSEILLE Stephanie (AREVA Resources Canada)" <Stephanie.Forseille@areva.ca>

Hi Sean,

Thank you for the prompt reply. I have made the changes in the drafted application. I am awaiting the figures for now, but hope to submit this application within the next couple weeks.

Regards,

Naomi Stumborg

Exploration SHEQ Supervisor

AREVA Resources Canada Inc.

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Naomi.Stumborg@areva.ca

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From: Sean Joseph [mailto:sean.joseph@nwb-oen.ca]

Sent: Thursday, March 05, 2015 10:27 AM

To: STUMBORG Naomi (AREVA Resources CANADA)

Cc: Phyllis Beaulieu (phyllis.beaulieu@nwb-oen.ca); Robin Ikkutisluk (robin.ikkutisluk@nwb-oen.ca); ROBBINS John (AREVA Resources Canada);

BLAIN Mario (AREVA Resources Canada)

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