



Water Resources Division
Resource Management Directorate
Nunavut Regional Office
P.O. Box 100
Iqaluit, NU, X0A 0H0

January 22, 2018

Richard Dwyer
Licensing Administrator
Nunavut Water Board
P.O. Box 119
Gjoa Haven, NU, X0B 1J0

Your file - Votre référence
2BE-KIG1318

Our file - Notre référence
CIDM#1207091

Re: Indigenous and Northern Affairs Canada's comments on Areva Resources Canada Inc.'s renewal application for water licence #2BE-KIG1318 – Kiggavik Project

Dear Mr. Dwyer,

Thank you for your December 15, 2017 invitation for technical review comments on the above referenced application.

The Water Resources Division of Indigenous and Northern Affairs Canada (INAC) examined the application and the results of our review are provided in the enclosed memorandum for the Nunavut Water Board's consideration. Comments have been provided pursuant to INAC's mandated responsibilities under the *Nunavut Waters and Nunavut Surface Rights Tribunal Act* and the *Department of Indian Affairs and Northern Development Act*.

INAC appreciates the opportunity to participate in this review. If there are any questions or concerns, please contact me at (867) 975-3876 or by e-mail at sarah.forte@canada.ca.

Sincerely,

Sarah Forté
Water Management Specialist

Technical Review Memorandum

To: Richard Dwyer, Licensing Administrator, Nunavut Water Board

From: Sarah Forté, Water Management Specialist, Water Resources Division, INAC

Date: January 22, 2018

Re: Review of Renewal Application for Type B Water Licence 2BE-KIG1318

Applicant: Areva Resources Canada Inc.
Project: Kiggavik
Region: Kivalliq

A. BACKGROUND

On December 15, 2017, the Nunavut Water Board (NWB or Board) provided notification of Areva Resources Canada Inc.'s (Areva or the licensee) submission of a renewal application for Type B water licence 2BE-KIG1318 for the Kiggavik Project.

The licence for the Kiggavik Project has been amended and renewed since 2007. The latest licence, which expires on June 13, 2018, allows for the use of up to 299 m³ of water per day and the deposit of waste. The undertaking licensed includes the operation of a 60 person camp and exploration activities including drilling and geophysical surveys. The site is located approximately 80 km west of Baker Lake and includes the Kiggavik and St. Tropez mineral leases.

The site has been in care and maintenance since 2016 when work was done to prepare for long term closure. Updated versions of management plans were included with the 2016 annual report to address the care and maintenance state of the project. These were the Abandonment and Restoration Plan, the Noise Abatement Plan, the Radiation Protection Plan, the Spill Contingency Plan, the Uranium Exploration Plan, the Waste Management Plan, and the Wildlife Mitigation and Monitoring Plan. All plans state they will be updated prior to a change in phase of the project.

A site visit on July 10, 2017 by an Indigenous and Northern Affairs Canada (INAC) Water Resource Officer found the infrastructure to be secured and in good condition. The eight tanks at the bulk fuel storage facility were noted to be empty.

The NWB requested interested parties review the application and make representations by January 22, 2018.

B. RESULTS OF REVIEW

On behalf of INAC Water Resources, the following comments and recommendations are provided for the Board's consideration.

1. Water sources

Reference:

- Water Licence 2BE-KIG1318 – Amendment No.1, Kiggavik Project, Nunavut Water Board, June 2015, Part C, Item 2
- Application for Water Licence Renewal – Kiggavik Project, Areva Resources Canada Inc., November 2017, Box 13
- Viable Water Sources for Exploration Map, Areva Resources Canada Inc., November 2017

Comment:

The licence prohibits the use of water from streams, and the renewal application states: “*All water sources are freshwater lakes*”. However, the Exploration Viable Sources map provided as Figure 1.0-3 has identified many potential sources in rivers, and because of the map scale, it is difficult to determine if some of these might be streams.

Recommendation:

The licensee should update their Viable Water Sources for Exploration map prior to using water for drilling to avoid using water from rivers and streams, unless permission for those locations has been obtained beforehand.

2. Reclamation security assessment

Reference:

- Application for Water Licence Renewal – Kiggavik Project, Areva Resources Canada Inc., November 2017, Box 21

Comment:

No financial security assessment was provided, however the renewal application states: “*AREVA is working closely with the Kivalliq Inuit Association (KIA) on the arrangements of financial security. If required for information purposes, AREVA can forward the security estimates to the NWB.*”

Recommendation:

The licensee should be required to submit a reclamation security estimate, and this estimate must be consistent with the *Mine Site Reclamation Policy for Nunavut* (INAC, 2002).