



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

Your file - Votre référence
2BE-KIY1722
Our file - Notre référence
CIDM#1271448

January 10, 2019

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 Comments on Montego Resources Inc. Update to Abandonment and Restoration Plan for the Kiyuk Lake Exploration Project, Licence No. 2BE-KIY1722

Dear Mr. Dwyer,

Thank you for your December 11, 2019 invitation for Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC) to comment on Montego Resources Inc.'s update to the Abandonment and Restoration Plan (Plan) for the Kiyuk Lake Exploration Project, Licence No. 2BE-KIY1722. CIRNAC examined the submission and provides the following comments, pursuant to CIRNAC's mandated responsibilities under the *Nunavut Waters and Nunavut Surface Rights Tribunal Act* and the *Department of Crown-Indigenous Relations and Northern Affairs Act*.

1. Departmental Name Change

Comment:

Crown-Indigenous Relations and Northern Affairs (CIRNA) is now the legal name of the department. The applied title is Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC). The legal name is required for all legal documents, and the applied title is acceptable for other documents.

Recommendation:

Please refer to the department in all future documentation by the legal name or by the applied title, as indicated in Comment 1.



2. Validity of Land Use Permit

Comment:

The Abandonment and Restoration Plan indicates that, at the time the Plan was written, the CIRNAC Land Lease was expired and required renewal.

Recommendation:

The proponent is reminded to ensure that the CIRNAC Land Lease, and that the Nunavut Water Board Water Licence are valid before any work, including restoration work, occurs.

3. Seeking Clarity in Section 2.0 SCHEDULE

Comment:

It is unclear from Section 2.0 SCHEDULE whether restoration will be ongoing after the termination of each drill site, or whether final restoration activities will not commence until all exploration has been completed. Further, the second sentence suggests that there may be conditions under which restoration work will not be completed under an active licence, and the final sentence in this section is incomplete.

Recommendation:

CIRNAC recommends that Montego Resources Inc. clarify the restoration schedule timeline, the triggers to begin restoration work, and plans or protocols which will be followed to complete the work. CIRNAC recommends that Montego Resources Inc. ensure that all licences, leases, and permits remain active until all reclamation work has been completed, and the Nunavut Water Board approves water licence cancellation.

4. Equipment and Fuel Inventory on Site

Comment:

The section on Equipment and Fuel Cache Inventory has been removed from this version of the Abandonment and Restoration Plan. Instead, the Plan states in Section 4.3 that, "An inventory of all fuel and on-site chemicals will be conducted prior to departing the site at the end of each field program/season."

Recommendation:

CIRNAC recommends that an updated fuel and equipment inventory be provided to the Nunavut Water Board at the end of each field program or season.

If there are any questions or concerns, please contact me at (867) 975-4282 or bridget.campbell@canada.ca.



Sincerely,

A handwritten signature in blue ink that reads "Bridget Campbell". The signature is fluid and cursive, with the first name "Bridget" being more prominent than the last name "Campbell".

Bridget Campbell,
Water Resources Coordinator