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

> Your file - Votre référence 2BE-MPM1722

Our file - Notre référence GCDocs# 96531821

July 23, 2021

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 Review of the Licence Amendment Application for the Meadowbank Precious Metals, Type B Water Licence No. 2BE-MPM1722

Dear Mr. Dwyer,

Thank you for the June 25, 2021 invitation to review the referenced licence amendment application, submitted by 5530 Nunavut INC., for Type B Water Licence No. 2BE-MPM1722.

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.

If there are any questions or concerns, please contact me at (306) 501-4047 or Andrew.Keim@canada.ca.

Sincerely,

Andrew Keim,

Water Resources, Nunavut Regional Office

Crown-Indigenous Relations and Northern Affairs Canada

Andrew.Keim@Canada.ca / Tel : (306) 501-4047

Technical Review Memorandum

Date: July 23, 2021

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

From: Andrew Keim, Water Resources, CIRNAC

Subject: Crown-Indigenous Relations and Northern Affairs Canada Review of the Licence Amendment Application for the Meadowbank Precious Metals, Type B Water Licence No. 2BE-MPM1722

Region:	☐ Kitikmeot	⊠ Kivalliq	□ Qikiqtani	

A. BACKGROUND

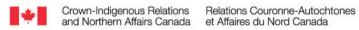
The Meadowbank Precious Metal Project (the "Project") is located in the eastern part of the Kivalliq Region. The Project consists of three non-contiguous claim blocks (Block A, B and C) located on Crown Lands, approximately 50 km north of the community of Baker Lake and 280 km northwest of the community of Rankin Inlet. The Project was originally licensed in 2017 by the Nunavut Water Board.

The application for amendment request submitted to the Nunavut Water Board seeks approval for construction of a seasonal 20 person exploration camp with fuel cache to be constructed adjacent to a staging area at kilometer 58 of the all-weather access road (AWAR), on crown land. An increase in water usage for camp and to facilitate the use of an additional four drills for exploration, and finally an extension to the expiry date of the license to June 30th of 2026.

Structures for the proposed camp include 10 sleeper tents, 1 medical tent, 1 kitchen, 1 dry (with showers), 1 office tent, core shack, generator shack, incinerator and outhouses/pacto systems. The majority of the structures will be insulated Weatherhaven tents, or similar, with plywood floors.

The exploration program, including rock, soil, and till geochemical sampling, geological mapping, ground and/or airborne geophysical surveys and diamond drilling of approximately 20,000 m. is anticipated following approval of the current application. The 2021 annual program is anticipated to commence approximately April 1 and run until September 30. Exploration activities will continue to be conducted out of Baker lake until such time as the application for amendment is approved by the Nunavut Water Board.

CIRNAC provides the following comments and recommendations pertaining to the application package. Documents reviewed as part of this submission can be found in Table 1 of Section B. Detailed technical review comments can be found in Section C.

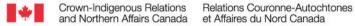


DOCUMENTS REVIEWED

The following table (Table 1) provides a summary of the documents reviewed under the submission.

Table 2: Documents Reviewed

Document Title	Author, File No., Rev., Date		
2BE-MPM1722 Application for Water Licence Amendment-IMLE	5530 Nunavut Inc. June 16, 2021		
Baker Lake HTO Letter of Support	Baker Lake HTO May 20, 2021		
17EN020 Screening Decision Report	Nunavut Impact Review Board May 18, 2017		
2BE-MPM1722 Amendment Renewal Authorization Letter	Western Atlas Resources Inc. Dec 16, 2020		
Consultation Log	Western Atlas Resources Inc. No Date		
Emergency Response Plan	Apex Geoscience June 1, 2021		
Exploration/Remote Camp Questionnaire	Apex Geoscience on behalf of 5030 Nunavut Inc. – No Date		
2BE-MPM1722 Summary English	Western Atlas Resources INC. June 2021		
Western Atlas Resources Consolidated Financial Statements	Western Atlas Resources Nov 9, 2020		
2BE-MPM1722 Compliance Assessment Report (letter)	Apex Geoscience June 1, 2021		
2BE-MPM1722 Spill Contingency & Fuel Management Plan	Apex Geoscience June 1, 2021		
2BE-MPM1722 Environmental Management Plan	Apex Geoscience June 1, 2021		
2BE-MPM1722 Water License	Nunavut Water Board		
2BE-MPM1722 2020 Precious Metal Project Annual Report 20201207_Optimized	Apex Geoscience December 7, 2020		



B. RESULTS OF REVIEW

1. Project Infrastructure / Fuel Storage

Comment:

CIRNAC appreciates the complete application package submitted by the proponent. CIRNAC had an opportunity to review the supplied documents including the Abandonment and Restoration Plan and the Spill Contingency and Fuel Management Plan, both provided by Apex Geoscience.

CIRNAC reviewed both documents for completeness and consistency and found little to no errors or omissions however one question related to fuel storage on site was identified. The proponent seeks to store up to 425 barrels for a total of 87,000 I of fuel as expressed in Table 3.1 of the Spill Contingency and Fuel Management Plan and application for amendment. However, in the text "2.1 Fuel" preceding the Table, there is a suggestion that fuel may be stored in 4000L tanks.

Recommendation:

(R-01) CIRNAC recommends that Apex Geoscience confirm the following;

- The mode of fuel storage,
- Confirm the sufficiency of secondary containment to accommodate 4000 L tanks, and:
- Confirm if these 4000L tanks are double walled or have integral secondary containment.

2. Hazardous Materials: Removal and Disposal

Comment:

Hazardous materials are a significant source of contamination in the North. Hazardous wastes of unknown origin have continued to be commonly found in community Land fills and Waste Management facilities. Ultimate disposal of Hazardous wastes as detailed in the water License must at a facility licensed to deal with Hazardous wastes. Those records are to be kept and presented to an inspector upon request. It is unclear from the application for amendment and the documents supplied by the Proponent what the plans are for the ultimate disposal of Hazardous wastes generated as a result of their activities.

Recommendation:

(R-02) CIRNAC recommends that all hazardous wastes be transported off site, following all applicable regulations and ultimately delivered to a facility licensed to dispose of hazardous wastes.