



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

Your file - Votre référence
2BE-NAD1722
Our file - Notre référence
GCDOCS# 106514210

October 20, 2022

Robert Hunter
Licensing Administrator
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 Renewal Application for the Dewar Lakes Camp, Type B Water Licence
No. 2BE-NAD1722**

Dear Robert,

Thank you for the October 5, 2022 invitation to review the referenced licence renewal application, submitted by APEX Geosciences Ltd. on behalf of Commander Resources Ltd., for Type B Water Licence No. 2BE-NAD1722.

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 (867) 975-3877 or Joyce.Demers@rcaanc-cirnac.gc.ca or Andrew Keim at (867) 975-4550 or Andrew.Keim@rcaanc-cirnac.gc.ca.

Sincerely,

Joyce Demers, B.Sc.,
Industrial Coordinator



Technical Review Memorandum

Date: October 20, 2022

To: Robert Hunter – Licensing Administrator, Nunavut Water Board

From: Joyce Demers – Industrial Coordinator, CIRNAC

Subject: Crown-Indigenous Relations and Northern Affairs Canada's Review of the Licence Renewal Application for the Dewar Lakes Camp, Type B Water Licence No. 2BE-NAD1722

Region: ☐ Kitikmeot ☐ Kivalliq ☒ Qikiqtani

A. BACKGROUND

APEX Geoscience Ltd is applying on behalf of Commander Resources Ltd (Commander) for a 5 year type B water license renewal, license number 2BE-NAD1722, for the Dewar Lakes Camp. The Water License application is solely for the purpose of running the camp and facilitating mineral exploration; it is not for mineral exploration itself. All exploration water licences are separate from this camp application. The other licence held for the camp is the land use permit N2017J0014, which expires on July 4th 2024.

The following is a brief history of the camp. It was used to help facilitate mineral exploration between 2003 to 2011, by Commander, and again from 2017 to 2018, by ValOre Metals Corp. In 2013 the camp was restored after an episode of vandalism.

The camp is located on Crown Land beside Dewar Lakes, adjacent to the North Warning System Fox-3 airstrip. The approximate geographical location of the camp is 68°37'59" N and 71°6'38" W. The closest national park to the camp is 140 km southeast away, called the Auyuittuq National Park. There is a closer territorial park to the camp which is 100 km to its north and is located near Clyde River. There is another protected area which is 150 km northeast from the camp, called the Ninginganiq National Wildlife Area.

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
R1	Confirmation that Only 2 m ³ /day of Water is Needed
R2	Location of Camp Infrastructure Unclear with Relation to Water Bodies
R3	Missing MSDS for Cleaning Products

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
220914 2BE-NAD1722 040401 - 04EN022-Screening Decision Report-ODTE	Albert Ehaloak, April 1, 2004
220914 2BE-NAD1722 100430 - 04EN022-Screening Decision Report-ODTE	Nunavut Impact Review Board, April 30, 2010
220914 2BE-NAD1722 120802 - 04EN022-Application Exempt Pursuant to NLCA 12 4 3-OT6E	Ryan Barry, August 2, 2012
220914 2BE-NAD1722 130809 - 04EN022-Application Exempt Pursuant to NLCA 12 4 3-OT1E	Ryan Barry, August 9, 2013
220914 2BE-NAD1722 170510 - NPC Letter re 148572 Dewar Lakes Camp-IMLE	Alana Vigna, May 10, 2017
220914 2BE-NAD1722 Abandonment & Restoration Plan-IMLE	APEX Geoscience Ltd., July 1, 2022
220914 2BE-NAD1722 APEX Commander Dewar Lakes Camp Permitting Authorization-IMLE	Robert Cameron, April 20, 2022
220914 2BE-NAD1722 CIRNAC LUP 2017J0014 - Extension Approved-IMLE	Natasha Wisintainer, July 4, 2022
220914 2BE-NAD1722 Commander Financial Statements-IMLE	Commander Resources Ltd., No Date
220914 2BE-NAD1722 Commander Resources Certificate of Incorporation-IMLE	John S. Powell, May 3, 2002
220914 2BE-NAD1722 Compliance Assessment Status Report-IMLE	Tara Gunson, May 25, 2022
220914 2BE-NAD1722 Dewar Lakes Camp Location Figure-IMLE	APEX Geoscience Ltd., June 2022
220914 2BE-NAD1722 Emergency Response Plan-IMLE	APEX Geoscience Ltd., July 1, 2022
220914 2BE-NAD1722 Environmental Management Plan-IMLE	APEX Geoscience Ltd., July 1, 2022
220914 2BE-NAD1722 Exploration Remote Camp Questionnaire-IMLE	APEX Geoscience Ltd., June 21, 2006
220914 2BE-NAD1722 Fuel Management Plan-IMLE	APEX Geoscience Ltd., July 1, 2022



Document Title	Author, File No., Rev., Date
220914 2BE-NAD1722 Non-Technical Summary - English-IMLE	APEX Geoscience Ltd., June 2022
220914 2BE-NAD1722 NPC Letter Re 149777 Dewar Lakes Camp-IMLE	Goump Djalogue, July 22, 2022
220914 2BE-NAD1722 Renewal Cover E-mail-IMLE	Tara Gunson, September 14, 2022
220914 2BE-NAD1722 Spill Prevention & Response Plan-IMLE	APEX Geoscience Ltd., July 1, 2022
220914 2BE-NAD1722 Waste Management Plan-IMLE	APEX Geoscience Ltd., July 1, 2022
220914 2BE-NAD1722 Water Licence Compliance Assessment-IMLE	No Author, July 18, 2017
220914 2BE-NAD1722 Water Licence Renewal Application-IMLE	Tara Gunson, September 14, 2022
221005 2BE-NAD1722 Renewal Notice-OLAE	Nunavut Water Board, October 5, 2022
221005 2BE-NAD1722 Water Licence Renewal Dist-OLAE	Robert Hunter, October 5, 2022



C. RESULTS OF REVIEW

1. Confirmation that Only 2 m³/day of Water is Needed

Comment:

In the Water Licence Renewal Application document, it states that there will be a maximum of 20 people at the camp, with an expected volume of 2 m³/day. It is unclear if that amount of water will be enough the expected occupancy of the camp.

Recommendation:

(R-01) CIRNAC recommends that the applicant confirm that only 2 m³/day is sufficient for the operation of the camp.

2. Location of Camp Infrastructure Unclear with Relation to Water Bodies

Comment:

The distance of the camp infrastructure, including: the tents, metal silo, incinerator and garbage, to the nearest water bodies, of note the Dewar Lakes, is unclear. All structures (permanent or otherwise), garbage and incinerator must be at least 31 meters away from any water body to ensure that no deleterious substances enter into any water body.

Recommendation:

(R-02) CIRNAC recommends that the applicant confirm that the tents, metal silo, incinerator and garbage will be set up at least 31 meters away from the high watermark of any water body.

3. Missing MSDS for Cleaning Products

Comment:

It was stated in the Spill Prevention and Response Plan that the MSDS for cleaning products used on site would be included, however were missing. Without this information readily available on site for site personnel to use, CIRNAC notes that employees and visitors to the site may not have adequate information to safely respond to events involving the products in question.

Recommendation:

(R-03) CIRNAC recommends that the applicant ensures that all products used on site will be included in the Spill Prevention and Response Plan..