



Water Resources Division
Resource Management Directorate
Nunavut Regional Office
918 Nunavut Drive
Iqaluit, NU, X0A 3H0

Your file - Votre référence
2BE-NUP2227
Our file - Notre référence
GCDOCS#147639240

June 26, 2026

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's Review of the
Assignment Application Acknowledgement for Nunavut Uranium Project, Type
B Water Licence No. 2BE-NUP2227**

Dear Richard Dwyer,

Thank you for the 5 June 2026 invitation to review the Assignment Application Acknowledgement, submitted by Geiger Energy Corp., for Type B Water Licence No. 2BE-NUP2227.

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.

The applicant shall provide confirmation from the Nunavut Water Board that all outstanding water license fees have been paid in full prior to approval of this application.

If there are any questions or concerns, please contact William Quere at william.quere@rcaanc-cirnac.gc.ca or (873) 452-1981 Or Andrew Keim at (867) 975-4550 or Andrew.keim@rcaanc-cirnac.gc.ca.

Sincerely,

William Quere, BSc
Regional Coordinator

Canada 



Technical Review Memorandum

Date: 26 June 2026

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

From: William Quere – Regional Coordinator, CIRNAC

Subject: Crown-Indigenous Relations and Northern Affairs Canada's Review of the Assignment Application Acknowledgement for Nunavut Uranium Project, Type B Water Licence No. 2BE-NUP2227

Region: ☐ Kitikmeot ☒ Kivalliq ☐ Qikiqtani

A. BACKGROUND

Geiger Energy Corp., formerly Forum Energy Metals Corp., has submitted documents to the Nunavut Water board as part of their assignment application for the Nunavut uranium project. This assignment has put Geiger in control of water licence 2BE-NUP2227, the Aberdeen Project. To this end, plans associated with the Aberdeen project have been submitted and updated with Geiger Energy's name. Geiger Energy Corp. was formed when Forum Energy corp. merged with Baselode Energy corp. in 2025.

The Aberdeen Project is around 100 kilometres from Baker Lake in the Kivalliq Region of Nunavut. Geiger energy is looking to house 15-40 people there during their summer field programs conducting exploration for Uranium. The project will be helicopter and fixed wing supported and will use up to 299 m³ a day of water.

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
R-01	Change Logs
R-02	Distance to Waterbodies
R-03	Abandonment and Restoration plan
R-04	Sumps
R-05	Secondary containment
R-06	Incinerator

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
260521 2BE-NUP2227 Application for Assignment of Water Licence-IMLE	Forum Energy Metals Corp., June 2026
260521 2BE-NUP2227 Baselode _ Forum - Arrangement Agreement (Executed Copy)_SUB-706367-IMLE	June 2025,
260521 2BE-NUP2227 Certificate and Articles of Amendment-IMLE	Ontario, October 2025
260521 2BE-NUP2227 Saskatchewan Filed Certificate and Articles of Amendment 12-01-2025-IMLE	Saskatchewan, October 2025
260521 2BE-NUP2227 Updated Saskatchewan Profile Report - 2025 Dec 01-IMLE	Saskatchewan, December 2025
260604 2BE-NUP2227 Aberdeen - Abandonment & Restoration Plan - 2026-IMLE	Geiger Energy Corp., June 2026
260604 2BE-NUP2227 Aberdeen - Spill Contingency Plan - 2026-IMLE	Geiger Energy Corp., June 2026
260604 2BE-NUP2227 Aberdeen - Waste Management Plan - 2026-IMLE	Geiger Energy Corp., June 2026
260604 2BE-NUP2227 Aberdeen Uranium Exploration Plan-IMLE	Geiger Energy Corp., June 2026
221013 2BE-NUP2227 Water Licence-OASE.pdf	NWB, October 2022



C. RESULTS OF REVIEW

1. Change Logs

Comment:

The change log for the Waste Management Plan does not include changes from previous plans associated with the project. Further, in the plan itself, the log states that it was last updated in April 2026 while, in various other areas, the plan is dated for June 2026. There is a concern that all changes are not marked in the log and readily available for review.

Recommendation:

(R-01) CIRNAC recommends that the change log in all plans submitted be updated to include changes from previous plans associated with the project. The applicant should include up to date logs in future submissions.

2. Distance to Waterbodies

Comment:

Throughout the submitted documents, the applicant states that required objects and infrastructure will be:

“30 m away from the normal high-water mark of a water body”.

The concern is that the actual standard is a minimum distance of at least thirty one (31) metres above the ordinary high water mark of any water body, at a site where direct flow into a water body is not possible.

Further to this and relevant to this project, a minimum distance of one hundred (100) metres from the ordinary High-Water Mark of any water body, with fencing, is required for uranium storage of cores, cuttings, and tailings.

Recommendation:

(R-02) CIRNAC recommends that the submitted documents be corrected to the standard of 31 and 100 metres, where applicable.

3. Abandonment and Restoration Plan

Comment:

The Closure and Reclamation plan provides general information on the project closure however it does not mention temporary closure procedures or regulator involvement.

**Recommendation:**

(R-03) CIRNAC recommends that temporary closure plans and procedures be added to the plan. Further, for final closure, areas of disturbed vegetation, including those at the temporary camps, fuel caches, and drill sites, should be photographed and managed in consultation with the CIRNAC Inspector.

4. Sumps**Comment:**

The greywater sump is mentioned in multiple plans but they do not include its dimensions, screens, grease traps, or wildlife proofing. The concern is that there is no plan to address these issues.

Recommendation:

(R-04) CIRNAC recommends that the greywater sump be described by its dimensions, food solid and grease collection, and wildlife proofing. Further, the applicant should update the required distance from nearby water bodies in all plans of the application to the standard of a minimum distance of thirty one (31) metres above the ordinary high water mark of any water body, at a site where direct flow into a water body is not possible.

5. Secondary Containment**Comment:**

The Spill Contingency Plan mentions secondary containment once but does not say what system will be used or its capacity. There is a concern that an insufficient system or capacities will be deployed for fuel and hazardous material containment.

Recommendation:

(R-05) CIRNAC recommends that the secondary containment systems be described, along with their capacity, to ensure the system is adequate for containment.

6. Incinerator**Comment:**

Section 6.2 of the Waste Management Plan states:

“The Project will utilize a batch feed dual chamber-controlled air incinerator to dispose of combustible solid wastes. These types of incinerators typically produce the highest quality burn, with the least amount of ash and airborne particles.



All combustible wastes will be incinerated in accordance with applicable federal and territorial regulations and the Nunavut Department of Environment Guideline for the Burning and Incineration of Solid Waste”.

The concern is that the make of the incinerator, conditions of waste to be incinerated, steps to burning, and burning log are not included but are necessary for evaluation. Without these, CIRNAC cannot determine if the incinerator is adequate for the standards of the site and project needs.

Recommendation:

(R-03) CIRNAC recommends that the applicant provide the required information and confirm that the incinerator will meet all applicable guidelines. Further, the applicant should confirm whether waste lumber will be burned as it is left vague in the Waste Management Plan.