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NUNAVUT WATER BOARD
NUNAVUT IMALIRIYIN KATIMAYINGI
OFFICE DES EAUX DU NUNAVUT

File No: **2BE-RCE2532**

January 23, 2025

Eric Sondergaard
Country Manager
White Cliff Minerals Limited
3139 Leduc Crescent SW
Calgary AB, T3E 5X1

Katsky Venter
Environmental Consultant
RainCoast Environmental Services Limited
221 Trincomali Hts,
Salt Spring Island, BC, V8K 1M9

Email: eric@wcminerals.com.au

E-mail: katsky.venter@gmail.com

RE: NWB Water Licence No: 2BE-RCE2532

Dear Mr. Sondergaard:

Please find attached Water Licence No: **2BE-RCE2532**, issued to White Cliff Minerals Limited by the Nunavut Water Board (NWB or Board) pursuant to its authority under Article 13 of the *Agreement between the Inuit of the Nunavut Settlement Area and Her Majesty the Queen in Right of Canada (Nunavut Agreement)*. The terms and conditions of the attached Licence related to the use of Water and the deposit of Waste are an integral part of this approval.

If the Licensee contemplates the continuing of this Undertaking after the Water Licence expires, it is the responsibility of the Licensee to apply to the NWB for a renewal water licence. The past performance of the Licensee, new documentation and information, and issues raised during a public hearing, if the NWB is required to hold one, will be used to determine the terms and conditions of the renewal Water Licence. Note that if the Licence expires before the NWB issues a new one, then the use of Water and the deposit of Waste must cease, or the Licensee may be in contravention of the *Nunavut Agreement* and the *Nunavut Waters and Nunavut Surface Rights Tribunal Act (NWNSRTA)*. However, the expiry or cancellation of a licence does not relieve the holder from any obligations imposed by the licence. The NWB recommends that an application for the renewal of this Licence be filed at least **three (3) months** prior to the Licence expiry date. It should be noted that in accordance with s. 75(1)(a) of the *Nunavut Planning and Project Assessment Act (NuPPAA)*, the Board is not allowed to issue a permit or authorization for any project proposal that has not been submitted to the Nunavut Planning Commission (NPC) in accordance with s. 76 of *NuPPAA*.

If the Licensee contemplates or requires an amendment to this Licence, the NWB may decide, in the public's interest, to hold a public hearing. The Licensee should submit applications for amendment as soon as possible to give the NWB sufficient time to go through the amendment process. The process and timing may vary depending on the scope of the amendment; however,

a minimum of **sixty (60) days** is required from time of acceptance by the NWB. It is the responsibility of the Licensee to ensure that all application materials have been received and are acknowledged by the Manager of Licensing.

The NWB strongly recommends that the Licensee consult the comments received from interested persons on issues identified. This information is attached for your consideration.¹

Sincerely,

Lootie Toomasie
Nunavut Water Board
Chair

LT/as/rh

Enclosure: Water Licence No: **2BE-RCE2532**
Comments – CIRNA, ECCC, DFO

Cc: Kitikmeot Distribution List

¹ Crown Indigenous Relations and Northern Affairs Canada (CIRNA), January 13, 2025; Environment and Climate Change Canada (ECCC), January 10, 2025; Fisheries and Oceans Canada (DFO), January 10, 2025.

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DECISION

LICENCE NUMBER: 2BE-RCE2532

This is the decision of the Nunavut Water Board (NWB) with respect to an application dated December 11, 2024 for a new type B Water Licence made by:

WHITE CLIFF MINERALS LIMITED

to allow for the use of waters and the deposit of waste during camp and exploration operations and related activities at the Rae Copper Project, located within Kitikmeot Region, Nunavut, generally located at the following geographical coordinates:

Project Extents

Latitude: 67° 51' 00" N	Longitude: 115° 00' 00" W
Latitude: 67° 12' 00" N	Longitude: 115° 49' 00" W
Latitude: 67° 40' 00" N	Longitude: 115° 22' 00" W
Latitude: 67° 58' 00" N	Longitude: 115° 22' 00" W

Camp

To Be Determined

DECISION

After having been satisfied that the Application is for a proposal that falls outside the area with an approved land use plan, the Nunavut Planning Commission (NPC) determined¹ that the project proposal requires screening by the Nunavut Impact Review Board (NIRB) in accordance with Schedule 12-1 of the *Nunavut Agreement*. Following the assessment, the NIRB determined² that a review of the project is not required pursuant to paragraph 92(1)(a) of the *Nunavut Planning and Project Assessment Act (NuPPAA)*. The NWB decided that the Application could proceed through the regulatory process. In accordance with s. 55.1 of the *Nunavut Waters and Nunavut Surface Rights Tribunal Act (Act)* and Article 13 of the *Nunavut Agreement*, public notice of the Application was given and interested persons were invited to make representations to the NWB.

After reviewing the submission of the Applicant and considering the representations made by interested persons, the NWB, having given due regard to the facts and circumstances, the merits of the submissions made to it and to the purpose, scope, and intent of the *Nunavut Agreement* and of the *Act*, waived the requirement to hold a public hearing, and determined that:

Licence No: 2BE-RCE2532 be issued subject to the terms and conditions contained therein (Motion #: 2024-B1-017).

Signed this 23rd day of January, 2025 at Gjoa Haven, NU.

Lootie Toomasie
Nunavut Water Board, Chair
LT/as/rh

¹ Nunavut Planning Commission, Determination, dated, August 30, 2024;

² Nunavut Impact Review Board, Screening Decision, dated, December 5, 2024

I. BACKGROUND

The Rae Copper Project (Project) is proposed to be a seasonal drilling exploration program based in the West Kitikmeot Region, about 60 kilometres southwest of the community of Kugluktuk. The Project will be looking for copper and silver and, consists of mineral claims on Inuit Owned Lands as well as Crown Lands. The Rae Copper Exploration Project is owned by White Cliff Minerals Ltd.

The Project will be accessed by plane using an existing all-weather Hope Lake Airstrip or a lake summer or winter strip and/or by helicopter. Supplies may also be brought in by winter trail from Kugluktuk using snowmobiles or snow cats. Within the Project area, access would primarily be by helicopter and foot. Winter trails or roads may be used when ground and snow/ice conditions permit. No all-weather roads are proposed.

The exploration camp will be comprised of temporary tent structures used for accommodations. Smaller structures will also be erected to house toilets, pump house, and generators. Portable fly camps may be used seasonally to support activities at remote locations. The camp will house between 25 to 45 people depending on activity. It is advised that camp location(s) will be selected based on a combination of logistical needs (e.g. being near to mineral targets, water sources, and a location accessible by plane) as well as environmental considerations (e.g. being located on dry durable ground, set back at least 31 m from the nearest waterbody, in a location that minimizes impacts and/or is in an already-impacted area (such as near the existing Hope Lake Airstrip) and cultural considerations (e.g. avoidance of any archaeological sites).

II. PROCEDURAL HISTORY

The application and supporting information (the Application), submitted for the Type B Water Licence No: 2BE-RCE2532, included the following documents:

- Cover Letter
- Application Form
- Non. Tech. Summaries
- Project Description and Supporting Materials V3
- Supplemental Information Guide V2
- NPC Conformity Determination File No. 150522
- Authorization Letter
- Spill Contingency Plan
- Waste Management Plan
- Engagement Summary
- Certificate of Incorporation
- NIRB-Cover Letter
- NIRB-Screening Decision Report
- NIRB-Notice of Release of SDR
- Rae Copper Exploration Project Mineral Claims and Lease
- WCM Permit Figure

With respect to pre-licensing requirements, the NWB received the Nunavut Planning

Commission's (NPC) Land Use Conformity Determination⁴ for the Undertaking indicating that the project proposal falls outside of the areas with applicable land use plans and that a screening is required by the Nunavut Impact Review Board (NIRB) in accordance with Schedule 12-1 of the *Nunavut Agreement*.

The NIRB's Screening Decision⁵ stated that a review of the project is not required pursuant to Article 12, Section 12.4.4(a) of the *Nunavut Agreement* and s. 92(1)(a) of the *Nunavut Planning and Project Assessment Act*, S.C. 2013, c. 14, s. 2 (NuPPAA).

Following receipt of the NIRB's Screening Decision and an internal preliminary review, the NWB distributed the Application on December 11, 2024 for a thirty (30) day review and comment period with the deadline for submission set for January 10, 2025. On or before the comment deadline, the NWB received submissions from Crown-Indigenous Relations and Northern Affairs (CIRNA), Environment and Climate Change Canada (ECCC) and the Fisheries and Oceans Canada (DFO). CIRNA and ECCC in their submissions, stated that they had no comments or concerns at this time.

DFO provided their recommendations for the Licensee to follow DFO's protective measures for fish and fish habitat and standard codes of practice. They also reminded that it is the Licensee's *Duty to Notify DFO if they have caused, or are about to cause, the death of fish by means other than fishing and/or the harmful alteration, disruption, or destruction of fish habitat.*

Application Scope

The scope of the Application includes the following:

- Temporary tent-based exploration camp, seasonal drilling program, aerial mapping surveys, ground sampling and baseline studies;
- Establishment of a temporary camp for up to forty-five (45) people;
- Reclamation of drill sites, site clean-up and progressive reclamation;
- Total water use of two hundred and ninety-nine (299) cubic metres per day; and
- Term of five (7) years.

III. FILE HISTORY

The NWB has not issued any licences to the Project in the past.

IV. GENERAL CONSIDERATIONS

The following sections provide general overviews of the rationale for some of the main terms and conditions included under the Licence.

Term of the Licence

In accordance with s. 45 of the *Nunavut Waters and Nunavut Surface Rights Tribunal Act* (NWNSRTA or Act), the NWB may issue a licence for a term not exceeding twenty-five (25)

⁴ Nunavut Planning Commission, determination, August 30, 2024

⁵ Nunavut Impact Review Board, Screening Decision, dated, December 5, 2024

years.

In their Application, the Licensee has requested a seven (7) year term. The Interveners, in their submissions, did not object to the term requested for the requested licence. The Board, in examining the Application, felt that the requested term was practical for the Undertaking. The Board has therefore granted the seven (7) year term requested by the Licensee. In so doing, the Board believes and expects that the seven-year term will provide the Licensee with significant opportunities to consistently abide by the terms and conditions in the Licence over time and provide ongoing compliance record prior to a need for renewal.

Annual Report

Under Part B, Item 2 of the Licence, the Licensee is required to submit Annual Reports for the purpose of ensuring that the NWB has an accurate annual update of activities related to Water use and Waste disposal during each calendar year. This information is maintained on the Public Registry and is available to interested parties upon request. A “Standardized Form for Annual Reporting” is to be used by the Licensee and is available from the NWB file transfer protocol (FTP) site under the Public Registry link at the NWB Website:

<ftp://ftp.nwb-oen.ca/other documents/Standardized Forms/>

Water Use

The quantity of water requested by the Applicant is two hundred and ninety-nine (299) cubic metres per day. Twenty (20) cubic metres per day is allocated for domestic camp use and two-hundred and seventy-nine (279) cubic metres of water is allocated for exploration activities. The Board has authorized the Licensee to use a maximum of two hundred and ninety-nine (299) cubic metres of water per day as per Part C, Item 1 of the Licence.

Camp

The Licensee is authorized to build a temporary or seasonal camp to support exploration activities under this Licence.

No concerns were expressed by the Interveners with respect to authorizing temporary camp operations to support exploration activities. Terms and conditions for camp operations are included in Part E of the Licence.

Deposit of Waste

The Licensee indicated in their application that the camp may utilize pacto toilets, whereby the blackwater waste will be collected in pacto bags and will be incinerated. Ash generated from black water incineration will be stored in designated, sealed and labelled metal 205L drums and removed from site for proper disposal.

Camp greywater will be stored and treated in an excavated sump, which will allow for slow infiltration into the soil and will be located at least 31 m from the normal high water mark of any waterbody.

All combustible waste will be incinerated in accordance with the Nunavut Environmental Guideline for the Burning and Incineration of Solid Waste and the Canada-Wide Standards (CWS) for Dioxins and Furans by the Canadian Council of Ministers of the Environment (CCME). Any residual waste (ash) will be placed in sealed containers and backhauled to an accredited facility for proper disposal.

Non-combustible waste, including bulky items/scrap metal, waste oil or hazardous waste, contaminated soil/water and empty barrels / fuel drums will be sealed in appropriate containers and backhauled for disposal at an approved facility. All hazardous waste, oils, contaminated soil and water shall be stored in sealed containers and shipped to an approved facility for disposal.

The Licensee has submitted the plan titled “*Rae Copper Project, Waste Management Plan*” dated October, 2024 along with the Application package. This document is being approved by the Board with the issuance of the Licence.

Spill Contingency Plan

The Licensee has submitted the plan titled “*Rae Copper Project Spill Contingency Plan*” dated October, 2024 along with the Application package. This Plan is being approved by the Board with the issuance of the Licence.

Abandonment and Restoration Plan

The Licensee did not submit an Abandonment and Restoration Plan with the Application package. The Board has included a condition in Part I of the Licence, requiring the Licensee to submit a Closure and Reclamation plan within 60 days of issuance of this Licence.

Monitoring

Part J of the Licence details the environmental monitoring requirements.

It should also be noted that additional sampling may be imposed by the Inspector.

Summary of Comments

Crown-Indigenous Relations and Northern Affairs (CIRNA) and Environment and Climate Change Canada (ECCC) stated that they had no comments or concerns at this time.

DFO provided their recommendations for the Licensee to follow DFO’s protective measures for fish and fish habitat and standard codes of practice. They also reminded that it is the Licensee’s *Duty to Notify DFO if they have caused, or are about to cause, the death of fish by means other than fishing and/or the harmful alteration, disruption, or destruction of fish habitat.*



NUNAVUT WATER BOARD WATER LICENCE

Licence No: 2BE-RCE2532

Pursuant to the *Nunavut Waters and Nunavut Surface Rights Tribunal Act* and the *Agreement Between the Inuit of the Nunavut Settlement Area and Her Majesty the Queen in right of Canada*, the Nunavut Water Board, hereinafter referred to as the Board, hereby grants to

WHITE CLIFF MINERALS LIMITED

(Licensee)

3139 LEDUC CRESCENT SW, CALGARY, AB, T3E 5X1

(Mailing Address)

hereinafter called the Licensee, the right to alter, divert or otherwise use water or dispose of waste for a period subject to restrictions and conditions contained within this Licence renewal:

Licence Number/Type: **2BE-RCE2532 / TYPE "B"**

Water Management Area: **AMUNDSEN GULF (27) AND COPPERMINE (28) WATERSHEDS**

Project / Location: **RAE COPPER PROJECT/ KITIKMEOT REGION, NUNAVUT**

Classification: **MINING UNDERTAKING (EXPLORATION)**

Purpose: **DIRECT USE OF WATER AND DEPOSIT OF WASTE**

Quantity of Water use not to Exceed: **TWO HUNDRED AND NINETY-NINE (299) CUBIC METRES PER DAY**

Date of Licence Issuance: **JANUARY 23, 2025**

Expiry of Licence: **JANUARY 22, 2032**

This Replacement Licence, issued and recorded at Gjoa Haven, Nunavut, includes and is subject to the annexed conditions.

**Lootie Toomasie,
Nunavut Water Board, Chair**

PART A: SCOPE, DEFINITIONS AND ENFORCEMENT

1. Scope

This Licence allows for the use of water and the deposit of waste for a Mining undertaking classified as per Schedule 1 of the *Regulations* at the Rae Copper Project, located approximately 60 kilometres southwest of Kugluktuk within the Kitikmeot Region, Nunavut.

- a. This Licence is issued subject to the conditions contained herein with respect to the taking of Water and the depositing of Waste of any type in any Waters or in any place under any conditions where such Waste or any other Waste that results from the deposits of such Waste may enter any Waters. Whenever new Regulations are made or existing Regulations are amended by the Governor in Council under the *Nunavut Waters and Nunavut Surface Rights Tribunal Act*, or other statutes imposing more stringent conditions relating to the quantity or type of Waste that may be so deposited or under which any such Waste may be so deposited, this Licence shall be deemed, upon promulgation of such Regulations, to be subject to such requirements; and
- b. Compliance with the terms and conditions of this Licence does not absolve the Licensee from responsibility for compliance with the requirements of all applicable Federal, Territorial and Municipal legislation.

2. Definitions

“**Act**” means the *Nunavut Waters and Nunavut Surface Rights Tribunal Act*;

“**Addendum**” means the supplemental text that is added to a full plan or report usually included at the end of the document and is not intended to require a full resubmission of the revised report;

“**Amendment**” means a change to original terms and conditions of this Licence requiring correction, addition or deletion of specific terms and conditions of the Licence; modifications inconsistent with the terms of the set terms and conditions of the Licence;

“**Applicant**” means the Licensee;

“**Appurtenant Undertaking**” means an undertaking in relation to which a use of water or a deposit of waste is permitted by a licence issued by the Board;

“**Board**” means the Nunavut Water Board established under the *Nunavut Agreement* and the *Nunavut Waters and Nunavut Surface Rights Tribunal Act*;

“**Effluent**” means treated or untreated liquid waste material that is discharged into the environment from a structure such as a settling pond, landfarm or a treatment plant;

“**Engineer**” means a professional engineer registered to practice in Nunavut in

accordance with the *Consolidation of Engineers and Geoscientists Act S. Nu 2008, c.2* and the *Engineering and Geoscience Professions Act S.N.W.T. 2006, c.16 Amended by S.N.W.T. 2009, c.12*;

“**Greywater**” means all liquid wastes from showers, baths, sinks, kitchens and domestic washing facilities, but does not include toilet wastes;

“**High Water Mark**” means the usual or average level to which a body of water rises at its highest point and remains for sufficient time so as to change the characteristics of the land (ref. Department of Fisheries and Oceans Canada, Operational Statement: Mineral Exploration Activities);

“**Inspector**” means an Inspector designated by the Minister under Section 85 (1) of the *Act*;

“**Licensee**” means the holder of this Licence;

“**Modification**” means an alteration to a physical work that introduces a new structure or eliminates an existing structure and does not alter the purpose or function of the work, but does not include an expansion;

“**Nunavut Agreement**” means the “*Agreement Between the Inuit of the Nunavut Settlement Area and Her Majesty the Queen in right of Canada*”, including its preamble and schedules, and any amendments to that agreement made pursuant to it;

“**Regulations**” means the *Nunavut Waters Regulations* SOR/2013-69 18th April, 2013;

“**Secondary Containment**” means an impermeable structure, external to and separate from primary containment, which prevents unplanned spills of hazardous materials and provides a minimum capacity of 110% of the original vessel. Where multiple vessels are stored within the containment, it must provide a minimum capacity equal to the sum of the largest vessel and 10% of the aggregate volume of all other vessels located in the containment. This structure shall also provide containment and control of hoses and nozzles;

“**Sewage**” means all toilet wastes and greywater;

“**Spill Contingency Plan**” means a Plan developed to deal with unforeseen petroleum and hazardous materials events that may occur during the operations conducted under the Licence;

“**Sump or Sumps**” A structure or depression that collects, controls, and filters liquid waste before it is released to the environment. This structure should be designed to prevent erosion while allowing percolation of liquid waste;

“**Toilet Wastes**” means all human excreta and associated products, but does not include greywater;

“Waste” means, as defined in s. 4 of the *Act*, any substance that, by itself or in combination with other substances found in water, would have the effect of altering the quality of any water to which the substance is added to an extent that is detrimental to its use by people or by any animal, fish or plant, or any water that would have that effect because of the quantity or concentration of the substances contained in it or because it has been treated or changed, by heat or other means;

“Water” or “Waters” means waters as defined in section 4 of the *Act*.

3. **Enforcement**

- a. Failure to comply with this Licence will be a violation of the *Act*, subjecting the Licensee to the enforcement measures and the penalties provided for in the *Act*;
- b. All inspection and enforcement services regarding this Licence will be provided by Inspectors appointed under the *Act*; and
- c. For the purpose of enforcing this Licence and with respect to the use of water and deposit or discharge of waste by the Licensee, Inspectors appointed under the *Act*, hold all powers, privileges and protections that are conferred upon them by the *Act* or by other applicable law.

PART B: GENERAL CONDITIONS

1. The water use fees, for the right to use Waters shall be paid annually in accordance with Section 12 of the *Regulations*.
2. The Licensee shall file an Annual Report on the Appurtenant Undertaking with the Board no later than the 31st March of the year following the calendar year being reported, containing the following information:
 - a. A summary report of Water use and Waste disposal activities;
 - b. Quantity of Water (in cubic metres/day) obtained during the reporting period for domestic and other purposes from sources on, in or flowing through Inuit-Owned Lands;
 - c. Quantity of Water (in cubic metres/day) obtained reporting period for domestic and other purposes from sources on, in or flowing through Crown Lands;
 - d. Quantity of Waste disposed of at on-site Waste disposal facility;
 - e. Quantity of Waste backhauled to approved facility for disposal;
 - f. A list of unauthorized discharges and a summary of follow-up actions taken;
 - g. Any revisions to the Spill Contingency Plan, Closure and Reclamation Plan, and other management Plans required by Part B, Item 7, submitted in the form of an Addenda;
 - h. A description of all progressive and or final reclamation work undertaken, including photographic records of site conditions before, during and after completion of operations;
 - i. Report all artesian flow occurrences as required under Part F, Item 3;

- j. A summary of all information requested and results of the Monitoring Program;
 - k. Details pertaining to locations of sump(s) and drill holes;
 - l. GPS co-ordinates (in degrees, minutes and seconds of latitude and longitude) for the locations of all temporary camps established in support of the project if the actual coordinates differ from that provided in the application;
 - m. A summary, including photographic records before, during and after any relevant construction activities or Modifications and/or major maintenance work carried out on facilities under this Licence and an outline of any work anticipated for the next year;
 - n. A summary of public consultation/participation, describing consultation with local organizations and residents of the nearby communities, if any were conducted;
 - o. Any other details on water use or waste disposal requested by the Board by the 1st November of the year being reported.
3. The Licensee shall notify the NWB of any changes in operating plans or conditions associated with this project at least thirty (30) days prior to any such change.
 4. The Licensee shall install flow meters or other such devices, or implement suitable methods required for the measuring of water volumes as required under Part J, Item 1.
 5. The Licensee shall, for all Plans submitted under this Licence, include a proposed timetable for implementation. Plans submitted, cannot be undertaken without subsequent written Board approval and direction. The Board may alter or modify a Plan if necessary to achieve the legislative objectives and will notify the Licensee in writing of acceptance, rejection or alteration of the Plan.
 6. The Licensee shall, for all Plans submitted under this Licence, implement the Plan as approved by the Board in writing.
 7. The Licensee shall review the Plans referred to in this Licence, as required by changes in operation and/or technology, and modify the Plan accordingly. Revisions to the Plans shall be submitted in the form of an Addendum to be included with the Annual Report.
 8. Every Plan to be carried out pursuant to the terms and conditions of this Licence shall become a part of this Licence, and any additional terms and conditions imposed upon approval of a Plan by the Board become part of this Licence. All terms and conditions of the Licence should be contemplated in the development of a Plan where appropriate.
 9. The Licensee shall ensure a copy of this Licence is maintained at the site of operations at all times. Any communication with respect to this Licence shall be made in writing to the attention of:

(a) Manager of Licensing:

Nunavut Water Board
P.O. Box 119
Gjoa Haven, NU X0B 1J0
Telephone: (867) 360-6338
Fax: (867) 360-6369

Email: licensing@nwb-oen.ca

(b) Inspector Contact:

Manager of Field Operations, CIRNA
Nunavut District, Nunavut Region
P.O. Box 100
Iqaluit, NU X0A 0H0
Telephone: (867) 975-4284
Fax: (867) 979-6445

10. The Licensee shall submit an electronic copy of all reports, studies, and plans to the Board. Reports or studies submitted to the Board by the Licensee shall include a detailed executive summary in Inuktitut and Inuinnaqtun.
11. The Licensee shall ensure that any document(s) or correspondence submitted by the Licensee to the NWB is received and acknowledged by the Manager of Licensing.
12. This Licence is assignable as provided for in section 44 of the *Act*.
13. The expiry or cancellation of this Licence does not relieve the Licensee from any obligation imposed by the Licence, or any other regulatory requirement.

PART C: CONDITIONS APPLYING TO WATER USE

1. The Licensee shall obtain Water for domestic camp use from sources proximal to camp facility. Total camp Water use shall not exceed twenty (20) cubic metres per day. Water for drilling shall be obtained from source(s), proximal to the drilling targets and shall not exceed two hundred and seventy-nine (279) cubic metres per day. The total volume of Water obtained for all purposes under this Licence shall not exceed two hundred (299) cubic metres per day.
2. The use of Water from streams or any water bodies not identified in Part C, Item 1, is prohibited unless authorized by the Board in writing.
3. If the Licensee requires Water in sufficient volume that the source water body may be drawn down the Licensee shall, at least thirty (30) days prior to commencement of use of Water, submit to the Board for approval in writing the following: volume required, hydrological overview of the water body, details of impacts, and proposed mitigation measures.
4. The withdrawal of Water from any stream shall not exceed ten (10) per cent of the low flow of that stream unless approved by the Board in writing.
5. The Licensee shall equip all water intake hoses with a screen of an appropriate mesh size to ensure that fish are not entrained and shall withdraw Water at a rate such that fish do not become impinged on the screen.

6. The Licensee shall not remove any material from below the ordinary High-Water Mark of any water body unless authorized.
7. The Licensee shall not cause erosion to the banks of any water body and shall provide necessary controls to prevent such erosion.
8. Sediment and erosion control measures shall be implemented prior to and maintained during the undertaking to prevent entry of sediment into water.

PART D: CONDITIONS APPLYING TO WASTE DISPOSAL

1. The Licensee shall locate areas designated for Waste disposal at a minimum distance of thirty-one (31) metres from the ordinary High-Water Mark of any water body such that the quality, quantity or flow of water is not impaired, unless otherwise approved by the Board in writing.
2. The Board has approved the Plan entitled *Rae Copper Project, Waste Management Plan*, dated October 2024, that was submitted as additional information with the Application.
3. The Licensee shall not practice on-site land-filling of domestic Waste, unless otherwise approved by the Board in writing.
4. The Licensee is authorized to dispose of all acceptable food Waste, paper Waste and untreated wood products in an incinerator.
5. The Licensee shall not open-burn plastics, wood treated with preservatives, electric wire, Styrofoam, asbestos or painted wood to prevent the deposition of waste materials of incomplete combustion and/or leachate from contaminated ash residual, from impacting any surrounding waters, unless otherwise approved by the Board in writing.
6. The Licensee shall provide to the Board documented authorization from all communities in Nunavut receiving Wastes from the Rae Copper Project prior to the backhauling and disposal of wastes to those communities.
7. The Licensee shall backhaul and dispose of all hazardous Wastes, Waste oil and non-combustible Waste generated through the course of the operation at a licensed waste disposal site.
8. The Licensee shall maintain records of all Waste backhauled and records of confirmation of proper disposal of backhauled Waste. These records shall be made available to an Inspector upon request.
9. The Licensee shall contain all Greywater in a Sump located at a 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 and no additional impacts are created, unless otherwise approved by the Board in writing.

10. The Licensee shall dispose of all toilet Waste through incineration, chemical or composting toilets. Any remaining residue generated through the course of the operation shall be backhauled and disposed of in an approved Waste disposal facility.

PART E: CONDITIONS FOR CAMPS, ACCESS INFRASTRUCTURES AND OPERATIONS

1. The Licensee is allowed to establish a temporary or seasonal camp in support of the Project.
2. The Licensee shall provide notice to an Inspector and the Board that includes the coordinates of the temporary or seasonal camp referred to in Part E, Item 1, at least fifteen (15) days prior to establishing the camp.
3. The Licensee shall not erect camps or store material on the surface of frozen streams or lakes including the immediate banks except what is for immediate use. Camps shall be located such as to minimize impacts on surface drainage.
4. All activities shall be conducted in such a way as to minimize impacts on surface drainage and the Licensee shall immediately undertake any corrective measures in the event of any impacts on surface drainage.
5. The Licensee shall construct all winter lake and stream crossings, including ice bridges, entirely of water, ice or snow. The Licensee shall minimize disturbance by locating ice bridges in an area that requires the minimum approach grading and the shortest crossing route. Stream crossings shall be removed or the ice notched prior to spring break-up.
6. With respect to access road, pad construction or other earthworks, the deposition of debris or sediment into or onto any water body is prohibited. These materials shall be disposed a distance of at least thirty-one (31) metres from the ordinary High-Water Mark in such a fashion that they do not enter the Water.
7. The Licensee shall not mobilize heavy equipment or vehicles unless the ground surface is capable of fully supporting the equipment or vehicles without rutting or gouging. Overland travel of equipment or vehicles shall be suspended if rutting occurs.
8. The Licensee will ensure that all stream crossings are at a minimum of five hundred (500) meters from spawning areas.
9. Sediment and erosion control measures shall be implemented prior to and maintained during the construction and operation where necessary to prevent entry of sediment into Water.

PART F: CONDITIONS APPLYING TO DRILLING OPERATIONS

1. The Licensee shall not conduct any land-based drilling within thirty-one (31) metres of the ordinary High-Water Mark of any water body, unless otherwise approved by the Board in writing.

2. The Licensee shall dispose of all drill waste, including water, chips, muds and salts (CaCl₂) in any quantity or concentration, from land-based drilling, in a properly constructed Sump or an appropriate natural depression located at a distance of at least thirty-one (31) metres from the ordinary High-Water Mark of any adjacent water body, where direct flow into a water body is not possible and no additional impacts are created.
3. If artesian flow is encountered, drill holes shall be immediately sealed and permanently capped to prevent induced contamination of groundwater or salinization of surface waters. The Licensee shall report all artesian flow occurrences within the Annual Report, including the location (GPS coordinates) and dates.
4. Drilling additives or mud shall not be used in connection with holes drilled through lake ice unless they are re-circulated or contained such that they do not enter the water, or are demonstrated to be non-toxic.
5. For “on-ice” drilling where drill additives are not being used, return water released must be nontoxic, and not result in an increase in total suspended solids in the immediate receiving waters, above the Canadian Council of Ministers for the Environment Guidelines for the Protection of Freshwater Aquatic Life (i.e. 10 mg/L for lakes with background levels under 100 mg/L, or 10% for those above 100 mg/L).
6. The Licensee shall establish water quality conditions prior to and upon completion of any drilling program through lake ice.

PART G: CONDITIONS APPLYING TO MODIFICATIONS

1. The Licensee may, without written consent from the Board, carry out Modifications to the Water and Waste management facilities provided that such Modifications are consistent with the terms of this Licence and the following requirements are met:
 - a. the Licensee has notified the Board in writing of such proposed Modifications at least sixty (60) days prior to beginning the Modifications;
 - b. such Modifications do not place the Licensee in contravention of the Licence or the *Act*;
 - c. such Modifications are consistent with the NIRB Screening Decision;
 - d. the Board has not, during the sixty (60) days following notification of the proposed Modifications, informed the Licensee that review of the proposal will require more than sixty (60) days; and
 - e. the Board has not rejected the proposed Modifications.
2. Modifications for which all of the conditions referred to in Part G, Item 1 have not been met can be carried out only with written approval from the Board.
3. The Licensee shall provide as-built plans and drawings of the Modifications referred to in this Licence within ninety (90) days of completion of the Modification. These plans and drawings shall be stamped by an Engineer.

PART H: CONDITIONS APPLYING TO SPILL CONTINGENCY PLANNING

1. The Board has approved the Plan entitled *Rae Copper Project, Spill Contingency Plan*, dated October, 2024 that was submitted as additional information with the Application.
2. The Licensee shall prevent any chemicals, petroleum products or wastes associated with the project from entering water. All Sumps and fuel caches shall be located at a distance of at least thirty-one (31) metres from the ordinary High-Water Mark of any adjacent water body and inspected on a regular basis.
3. The Licensee shall conduct any equipment maintenance and servicing in designated areas and shall implement special procedures (such as the use of drip pans) to manage motor fluids and other waste and contain potential spills.
4. If during the term of this Licence, an unauthorized discharge of waste occurs, or if such a discharge is foreseeable, the Licensee shall:
 - a. Employ the approved Spill Contingency Plan;
 - b. Report the spill immediately to the 24-Hour Spill Line at (867) 920-8130 and to the Inspector at (867) 975-4284; and
 - c. For each spill occurrence, submit to the Inspector and the Board, no later than thirty (30) days after initially reporting the event, a detailed report that will include the amount and type of spilled product, the GPS location of the spill, and the measures taken to contain and clean up the spill site.
5. The Licensee shall, in addition to Part H, Item 4, regardless of the quantity of releases of harmful substances, report to the NWT/NU Spill Line if the release is near or into a water body.

PART I: CONDITIONS APPLYING TO CLOSURE AND RECLAMATION, OR TEMPORARY CLOSURE

1. The Licensee shall, within 60 days of the issuance of this Licence, submit to the Board for approval a standalone Closure and Reclamation Plan.
2. The Licensee shall complete all restoration work prior to the expiry of this Licence.
3. The Licensee shall carry out progressive reclamation of any components of the Project no longer required for the Licensee's operations.
4. The Licensee shall backfill and restore all sumps, sewage / wash-water pits to the pre-existing natural contours of the land.
5. The Licensee shall remove from the site, all infrastructure and site materials, including all fuel caches, drums, barrels, buildings and contents, docks, water intakes, pumps and lines, material and equipment prior to the expiry of this Licence.

6. All roads and airstrip, if any, shall be re-graded to match natural contour to reduce erosion.
7. The Licensee shall remove any culverts and restore the drainage to match the natural channel. Measures shall be implemented to minimize erosion and sedimentation.
8. In order to promote growth of vegetation and the needed microclimate for seed deposition, all disturbed surfaces shall be prepared by ripping, grading, or scarifying the surface to conform to the natural topography.
9. Areas that have been contaminated by hydrocarbons from normal fuel transfer procedures shall be reclaimed to meet objectives as outlined in the Government of Nunavut's Environmental Guideline for Site Remediation, 2010. The use of reclaimed soils for the purpose of back fill or general site grading may be carried out only upon consultation and approval by the Government of Nunavut, Department of Environment and an Inspector.
10. The Licensee shall restore all drill holes and disturbed areas to natural conditions immediately upon completion of the drilling. The restoration of drill holes must include the removal of any drill casing materials and if having encountered artesian flow, the capping of holes with a permanent seal. Where drill casings cannot be removed, the Licensee shall cut off the casings at ground level and identify with signage.
11. The Licensee may leave the casings on site, if it intends to continue drilling in existing casings, but shall add signaling to keep the area safe for the other territory users. The drill casings left cannot stay on the field for more than 2 years after the drilling.
12. The Licensee may store drill cores produced by the appurtenant undertaking in an appropriate manner and location at least thirty-one (31) metres above the ordinary High-Water Mark of any adjacent water body, where any direct flow into a water body is not possible and no additional impacts are created.
13. The Licensee shall contour and stabilize all disturbed areas to the extent possible to pre-disturbed state upon completion of work.

PART J: CONDITIONS APPLYING TO THE MONITORING PROGRAM

1. The Licensee shall measure and record, in cubic metres, the daily quantities of Water used from sources located on, in or flowing through Crown Land, utilized for camp, drilling and other purposes.
2. The Licensee shall provide the GPS co-ordinates (in degrees, minutes and seconds of latitude and longitude) of all locations where sources of Water are utilized for all purposes.
3. The Licensee shall determine the GPS co-ordinates (in degrees, minutes and seconds of latitude and longitude) of all locations where Wastes associated with camp operations are deposited.

4. The Licensee shall obtain representative samples of the water column below any ice where required under Part F, Items 5 and 6. Monitoring shall include, at a minimum, the following:

Group	Parameters
Physical Parameters	pH, electrical conductivity, total suspended solids.
Major Ions	Calcium, chloride, magnesium, potassium, sodium, sulphate.
Total Metals	Aluminum, antimony, arsenic, barium, beryllium, boron, cadmium, chromium, copper, iron, lead, lithium, manganese, mercury, molybdenum, nickel, selenium, silver, strontium, tin, titanium, uranium, vanadium and zinc.

5. All sampling, sample preservation and analyses shall be conducted in accordance with methods prescribed in the current edition of *Standard Methods for the Examination of Water and Wastewater*, or by such other methods approved by the Board in writing.
6. All analyses shall be performed in a laboratory accredited according to ISO/IEC Standard 17025. The accreditation shall be current and in good standing.
7. The Licensee shall include in the Annual Report required under Part B, Item 2 all data, monitoring results and information required by this Part.
8. Additional monitoring requirements may be imposed by the Inspector.