



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

Your file - Votre référence
2BE-STO2025
Our file - Notre référence
GCDOCS#143851563

April 17, 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 Licence Amendment/Renewal Application for Storm Project, Type B Water Licence No. 2BE-STO2025

Dear Richard Dwyer,

Thank you for the 20 March 2026 invitation to review the licence amendment and renewal application, submitted by Aston Bay Holdings Ltd, for Type B Water Licence No. 2BE-STO2025.

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



Technical Review Memorandum

Date: 17 April 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 Licence Amendment/Renewal Application for Storm Project, Type B Water Licence No. 2BE-STO2025

Region: Kitikmeot Kivalliq Qikiqtani

A. BACKGROUND

Storm Project is located in the Qikiqtani Region of Nunavut on Northern Somerset Island with the closest community being Resolute Bay 112 KM to the North. The project is Owned by Aston Bay Holdings Inc. which has a camp located at 73°39’23” N 94°27’07” W along the Aston River.

The current application seeks to reduce project extents, add a water source to their camp, increase personnel from 40 to 65, increase fuel, chemical, and materials on site, add a marine landing area, and bring in additional equipment. The application is for five years from June 2026 to September 2031.

The current application is for the amendment and renewal of water licence 2BE-STO2025 which expired in August of 2025. With this expiry, they are now non-compliant in at least two items of their licence including Part I, Item 2 which states

“The Licensee shall complete all restoration work prior to the expiry of this Licence.”

Additionally Item 5 states

“The Licensee shall remove from the site, all infrastructure and site materials, including all fuel caches, drums, barrels, buildings and contents, docks, water pumps and lines, material and equipment prior to the expiry of this Licence.”

The applicant acknowledges these and seeks to remedy them through renewal.

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	Lake North of Camp
R-02	Seasonal Shutdown Storage
R-03	Marine Landing Area

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
251215 2BE-STO2025 100222 N2010C003 - NPC Conformity Determination-IMLE	NPC, 21 Feb 2010
251215 2BE-STO2025 100423 2BE-STO - NPC Conformity Determination-IMLE	NPC, 23 April 2010
251215 2BE-STO2025 100513-10EN013-Screening Decision Report-IMLE	NIRB, 13 May 2010
251215 2BE-STO2025 101015 2BE-STO - NPC Additional Conformity Determination Not Required-IMLE	NPC, 15 October 2010
251215 2BE-STO2025 110228 Certificate of Incorporation Escudo Capital Corporation-IMLE	BC Province, 28 February 2011
251215 2BE-STO2025 120706-10EN013-Application Exempt Pursuant to NLCA 12 4 3-IMLE	NIRB, 6 July 2012
251215 2BE-STO2025 120921 2BE-STO1015 - NPC Additional Conformity Determination Not Required-IMLE	NPC, 21 September 2012
251215 2BE-STO2025 130122-10EN013-Application Exempt Pursuant to NLCA 12 4 3-IMLE	NIRB, 22 January, 2013
251215 2BE-STO2025 130502 Certificate of Name Change Aston Bay Holdings-IMLE	BC Province, 2 May 2013
251215 2BE-STO2025 130607-10EN013-Application Exempt Pursuant to NLCA 12 4 3 - Incorrect Water Licence No-IMLE	NIRB, 7 June 2013



Document Title	Author, File No., Rev., Date
251215 2BE-STO2025 140226-10EN013-Application Exempt Pursuant to NLCA 12 4 3 - Incorrect Water Licence No-IMLE	NIRB, 26 February 2014
251215 2BE-STO2025 150326-10EN013-Application Exempt Pursuant to NLCA 12 4 3-IMLE	NIRB, 26 March 2015
251215 2BE-STO2025 200525 NPC File No. 149360 Conformity Determination-IMLE	NPC, 25 May 2020
251215 2BE-STO2025 250616 Hamlet of Resolute Bay Letter of Support - Storm Copper Project-IMLE	Hamlet of Resolute Bay, 16 June 2025
251215 2BE-STO2025 250829 Aston Bay Holdings Financial Report-IMLE	Aston Bay Holding Inc, 30 June 2025
251215 2BE-STO2025 251112 Aston Bay Storm Project Engagement Log-IMLE	Aston Bay Holding Inc
251215 2BE-STO2025 Abandonment & Restoration Plan-IMLE	Aston Bay Holding Inc, 1 December 2025
251215 2BE-STO2025 APEX Authorization Letter-IMLE	Aston Bay Holding Inc, 22 March 2025
251215 2BE-STO2025 Application for Water Licence Amendment-IMLE	Aston Bay Holding Inc, 12 December 2025
251215 2BE-STO2025 Emergency Response Plan-IMLE	Aston Bay Holding Inc, 16 May 2025
251215 2BE-STO2025 Environmental Management Plan-IMLE	Aston Bay Holding Inc, 1 December 2025
251215 2BE-STO2025 Mineral Tenure Figure-IMLE	Aston Bay Holding Inc, March 2025
251215 2BE-STO2025 Non-Technical Summary - English-IMLE	Aston Bay Holding Inc, NA
251215 2BE-STO2025 Project Description Figure-IMLE	Aston Bay Holding Inc, June 2025
251215 2BE-STO2025 Remote Camp Questionnaire-IMLE	Aston Bay Holding Inc, NA
251215 2BE-STO2025 Spill Prevention and Response Plan-IMLE	Aston Bay Holding Inc, 1 December 2025
251215 2BE-STO2025 Waste Management Plan-IMLE	Aston Bay Holding Inc, 1 December 2025
251215 2BE-STO2025 Water Licence Compliance Assessment Status Report-IMLE	Apex Geoscience, 20 November 2025
251215 2BE-STO2025 Water Licence Compliance Assessment-IMLE	Apex Geoscience, 20 November 2025
251215 2BE-STP2025 250722 Aston Bay Storm Project Reclamation Cost Estimate-IMLE	Aston Bay Holding Inc, July 2025
251215 2BE-STP2025 251017 NPC File No. 150931 Conformity Determination-IMLE	NPC, 17 October 2025
200817 2BE-STO2025 Replacement Licence-OSKE.pdf	NWB, 17 August 2020



C. RESULTS OF REVIEW

1. Lake North of Camp

Comment:

The application states

“In addition to the current camp water source (Aston Bay River), the proposed amendment adds an additional source from the lake north of camp at approximately 73°40’05” N latitude and 94°27’17” W longitude. Water from the lake will be utilized during spring exploration programs when the Aston River is frozen. Water for drilling will still be sourced from waterbodies near drill sites.”

There is no information given regarding transportation, storage, or characteristics from the new water source. CIRNAC is concerned about the distance to the new lake and if any infrastructure will be required to transport water from the lake and across Aston river.

Recommendation:

(R-01) CIRNAC recommends the applicant provide information and plans relevant to drawing water from the new water source, transportation to the camp, and any available water description. These are to include sediment and erosion control measures where necessary as required by Part C of the water licence.

2. Seasonal Shutdown Storage

Comment:

Section 3.1 of the abandonment and restoration plan states

“All structures left on site will be winterized, closed, and secured. One or more tents or plywood buildings will be designated to house any chemicals or other hazardous materials that are not suited to outdoor storage.”

The concern is that tents may not be adequate storage of chemicals or hazardous materials.

Recommendation:

(R-02) CIRNAC recommends the applicant clarify how chemical or hazardous materials are stored over seasonal shutdown and what additional storage or secondary containment measures are in the proposed locations that prevent wildlife intrusion and environmental exposure.



3. Marine Landing Area

Comment:

Section 5.2 of the Spill prevention and Response plan states

“Fuel will be mobilized to the Project either by sealift to the Marine Landing Area or by fixedwing aircraft directly to Storm Camp. From camp, fuel will be slung by helicopter to the drill sites. Drums will be inspected prior to loading and again upon arrival at fuel caches or drill sites to identify any defects (e.g. torn, missing, or twisted gaskets, etc.). All transport and handling of fuel will comply with applicable legislation, including the Transportation of Dangerous Goods Regulations.”

CIRNAC is concerned that there is not enough information regarding the proposed Marine Landing Area given that there is no description of the landing area, necessary infrastructure, or an updated fuel management plan to reflect the additional fuel movement through or storage at the site.

Recommendation:

(R-03) CIRNAC recommends the applicant update their Fuel Management Plan to include the current and proposed use of the landing area. Further, the applicant should describe any current or proposed infrastructure in the area and how the deposition of debris or sediment into any waterbody during operations is prevented as required by Part E of the water licence.