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Robin Ikkutisluk
Administrative Coordinator
Nunavut Water Board
P.O. Box 119
Gjoa Haven, NU
X0B 1J0

July 8, 2020

RE: 200609 2BE-STO1520 Amendment-Renewal Water Licence Application - Aston Bay Holdings Inc. - Storm Project - Qikiqtani Region

Dear Robin,

The Qikiqtani Inuit Association (QIA) has prepared this letter in response to the Nunavut Water Board's (NWB) invitation for interested parties to make representations about Aston Bay Holdings Inc.'s (The Proponent) Storm Project water licence amendment application. QIA thanks the NWB for providing this opportunity for comment.

QIA has reviewed the documents associated with Aston Bay's amendment application and while the Proponent has stated clearly in their *Non-Technical Summary* that "no exploration activities, drilling, water use, or waste disposal will be undertaken on Inuit Owned Land (IOL)", QIA takes exception to how the company described their project boundaries in *Figure 1: Aston Bay Project Extent and current drilling area*. Figure 1, shown below, shows two distinct inaccuracies:

- A blue outline of the "Project Extent – Currently Permitted" overlaps a significant portion of Inuit Owned Lands. QIA asserts that Aston Bay Holding's Inc. does not in fact hold any current permits with the Qikiqtani Inuit Association for access to IOL.
- A red outline of the "Aston Bay Property Boundary" also overlaps with a slightly smaller, yet still significant portion of Inuit Owned Lands. QIA asserts that Aston Bay Holding's Inc. does not own any of the IOL, therefore the company should not be calling it their property boundary.

QIA requests that the Proponent amend their project description along with associated maps, figures, etc, to more accurately reflect their land ownership and current permit status.

Furthermore, if the Proponent wishes to access IOL in the future, or if you have any further questions regarding IOL access and permit status, do not hesitate to contact me directly.

Sincerely,

Joel Fortier
Manager, Lands Administration
Department of Lands and Resource Management
Qikiqtani Inuit Association



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Figure 1. Aston Bay Project Extent and current drilling area.

