

Rae-co Consulting Ltd

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July 22, 2022

Mr. Dwyer
Manager of Licencing
Nunavut Water Board
P.O. Box 119
Gjoa Haven, NU, X0B 1J0
E-mail: licencing@nwb-oen.ca

Dear Mr. Dwyer:

Regarding CIRNAC's review comments concerning Water Licence Application 2BE-TTM --- for Bathurst Metals Corporation's TTMG Project in the Kitikmeot Region of Nunavut, our response to the reviewers comments are as follows:

1. Scope of Water Licence Application

"(R-01) CIRNAC recommends that the applicant make sure all project activities that may involve water usage be within the scope of this water licence application or permitted under another valid water licence."

Bathurst Metals Corp. (BMC) believes the description of the project activities that was provided for background was misconstrued as being part of the scope of the Water Licence Application.

2. Management Plans

"(R-02) CIRNAC recommends that at a minimum, a fuel management plan, a spill prevention and response plan, a waste management plan, and an abandonment and reclamation plan be provided by the applicant for the review of this water licence application."

BMC has provided a "Fuel Management Plan", a "Spill Prevention and Response Plan" a "Waste Management Plan". Additionally, BMC is providing an "Abandonment and Restoration Plan", an "Environmental Management Plan" and an "Emergency Response Plan".

3. Quantify Water Usage for Drilling

"(R-03) CIRNAC recommends that the licensee clarify how the quantity of water usage for drilling will be measured or estimated and the daily limit respected."

BMC intends to use the following equipment and procedures to address the above recommendation:

A water flow meter will be attached to the water collection pump to measure and record the amount of water used daily.

The water pump will be shut off when water flow is not required at the drill minimizing the amount of water collected during the drilling process.

All efforts will be made to recirculate drill water to minimize the amount of water used in the drill process and minimize the amount of drill additives needed for successful drill operations.

The collection of water will be halted if/when the maximum allowable water production level is reached on any given day.

4. Drilling Additives

“(R-04) CIRNAC recommends that the applicant provide the details to substantiate the statement that all drilling additives used in the drilling process will be environmentally friendly and safe for the local environment.”

BMC intends to use environmentally friendly drilling products on the TTMG Project. Attached are SDS for drilling products we intend to use on our project.

Sincerely,

A handwritten signature in black ink, appearing to be 'GB' or similar initials, with a long horizontal stroke extending to the right.

Greg Bronson, P.Geo.