

19<sup>th</sup> June 2026

**To:**  
**Sarah Pakozdi**  
Biologist  
Fish and Fish Habitat Protection Program  
Fisheries and Oceans Canada – Arctic Region  
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**Cc:**  
**Richard Dwyer** – Manager of Licensing, Nunavut Water Board ([licensing@nwb-oen.ca](mailto:licensing@nwb-oen.ca))

**Subject:** Response to DFO-FFHPP Comments – Victory Lake Project Water Licence Application, File No. 2BE-VLP

Dear Sarah,

1517081 B.C. Ltd. (Victory Exploration) acknowledges receipt of DFO's Fish and Fish Habitat Protection Program comments dated 5 June 2026 on our Type B Water Licence Application No. 2BE-VLP for the Victory Lake Project. We thank DFO for the detailed guidance and respond to each point below. We note that while the primary program is targeted for the summer open-water season (July–September), the licence is sought for a two-year term and drilling may occur in any season including ice-covered periods.

## **1. End-of-Pipe Fish Screens**

### **DFO Recommendation:**

DFO recommends following the Interim Code of Practice for end-of-pipe fish protection screens, using fine mesh screening of 2.54 mm (1/10”) with moderate intake velocities to prevent entrainment and impingement.

### **Response:**

All water intake hoses will be fitted with 2.54 mm fine mesh screening with moderate intake velocities, consistent with DFO's Interim Code of Practice and the Winter Protocol. During ice-covered operations, intakes will be positioned in deep water (>2 m below ice surface) away from fish-bearing inlets/outlets and the littoral zone. The pump will be housed within a secondary plastic containment bund at the water source at all times.

## **2. Restricted Activity Timing Windows**

### **DFO Recommendation:**

DFO asks the proponent to respect the Nunavut in-water works Restricted Activity Timing Windows to protect fish during spawning and incubation periods.

### **Response:**

DFO's Nunavut Restricted Activity Timing Windows will be reviewed and adhered to prior to commencing water withdrawal in each field season. Water withdrawal will be scheduled outside of all applicable restricted periods.

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### **3. Water Withdrawal Rates from Watercourses**

#### **DFO Recommendation:**

DFO recommends following the Framework for Assessing Ecological Flow Requirements to Support Fisheries in Canada, maintaining withdrawal rates below 10% of instantaneous flow and ensuring flows do not fall below 30% of mean annual discharge (MAD).

#### **Response:**

Water will be drawn from lakes rather than flowing watercourses wherever practicable in all seasons. Source lakes are large (up to 30 km<sup>2</sup>); maximum seasonal drawdown per lake has been calculated and documented in the Water Sources table submitted with the application, confirming that proposed withdrawals are a very small fraction of available volume. Total seasonal extraction is estimated at 1,000–2,000 m<sup>3</sup>, further reduced by closed-loop water recycling in the drill rigs. Where any flowing watercourse is used, withdrawal will remain below 10% of instantaneous flow and will not reduce flows below 30% of MAD.

### **4. DFO Winter Water Withdrawal Protocol (2010)**

#### **DFO Recommendation:**

DFO recommends the proponent follow the Winter Protocol and not withdraw more than 10% of under-ice water volumes. The Protocol includes water source identification, bathymetric survey requirements, and volume calculations that must be provided to DFO for review and concurrence prior to program commencement where applicable.

#### **Response:**

1517081 B.C. Ltd. has reviewed the Winter Protocol and notes that it does not apply to any waterbody from which less than 100 m<sup>3</sup> is withdrawn in one ice-covered period.

Our drill rigs use a closed-loop water recycling system, significantly reducing the volume drawn from any individual source. Each drill hole is a short-duration activity before the rig moves to a new location and a new water source is likely used. The Company will actively track and record water withdrawal per waterbody and will manage operations to ensure the 100 m<sup>3</sup> per-waterbody threshold is not exceeded in any ice-covered period. On this basis, the bathymetric survey and formal DFO concurrence requirements of the Protocol are not anticipated to be triggered.

Should operational requirements necessitate withdrawal exceeding 100 m<sup>3</sup> from any single waterbody during an ice-covered period, the Company will notify DFO in advance and comply fully with all Winter Protocol requirements, including water source identification, bathymetric surveys, volume calculations, and DFO review and concurrence prior to commencement.

### **5. Site-Specific DFO Review**

#### **DFO Recommendation:**

DFO notes that if the proposal meets the criteria for a site-specific review, the proponent should complete and submit a request for review form via DFO's website.

#### **Response:**

The criteria for a site-specific review will be assessed prior to each field season. Given the low withdrawal volumes, large lake sources, screened intakes, and timing window compliance, a site-specific review is not anticipated to be triggered. A request for review will be submitted if the criteria are met.

## **6. Duty to Notify DFO**

### **DFO Recommendation:**

DFO noted the proponent's Duty to Notify DFO in the event of causing, or being about to cause, the death of fish by means other than fishing, or the harmful alteration, disruption, or destruction of fish habitat.

### **Response:**

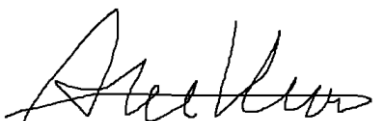
All site personnel will be briefed on the Duty to Notify requirement prior to mobilisation in each field season. Any incident with the potential to cause fish mortality or harm fish habitat will be reported promptly to DFO.ARCEMTriage-TriageGEARC.MPO@dfo-mpo.gc.ca.

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1517081 B.C. Ltd. is committed to the protection of fish and fish habitat and to full compliance with the Fisheries Act in all seasons of operation.

Please do not hesitate to contact us if any further information is required.

Sincerely,



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