



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

Your file - Votre référence
8BD-GBR----
Our file - Notre référence
GCDocs# 133821080

February 26, 2025

Robert Hunter
Licensing Administrator
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 New Water Licence Application for the Field Research for Grays Bay Road and Port Project, Type B Water Licence No. 8BD-GBR----

Dear Robert,

Thank you for the February 18, 2025 invitation to review the referenced new licence application, submitted by West Kitikmeot Resource Corp, for Type B Water Licence No. 8BD-GBR----.

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 me at (867) 975-3877 or Joyce.Demers@rcaanc-cirnac.gc.ca or Andrew Keim at (867) 975-4550 or Andrew.Keim@rcaanc-cirnac.gc.ca.

Sincerely,

Joyce Demers, B.Sc.,
Industrial Coordinator



Technical Review Memorandum

Date: February 26, 2025

To: Robert Hunter – Licensing Administrator, Nunavut Water Board

From: Joyce Demers – Industrial Coordinator, CIRNAC

Subject: Crown-Indigenous Relations and Northern Affairs Canada's Review of the New Water Licence Application for the Field Research for Grays Bay Road and Port Project, Type B Water Licence No. 8BD-GBR----

Region: ☒ Kitikmeot ☐ Kivalliq ☐ Qikiqtani

A. BACKGROUND

West Kitikmeot Resource Corp (WKR) is an Inuit-owned and led company based in Cambridge Bay Nunavut. WKR's largest shareholder is a wholly-owned subsidiary of the Kitikmeot Inuit Association (KIA). They are applying for a 10 year new water licence.

WKR is applying for a type B water licence for drilling, research purposes, ice pad construction and ice strip maintenance for up to 299 m³/day. It is noted that they have obtained permission from Blue Star Gold Corp. to utilize Ulu's camp for water use and waste deposit under water licence 2BM-ULU2030.

This application is for the field research for Grays Bay Road and Port Project (Project). It is not for the construction of the road or port. The Grays Bay Road and Port Project is a transportation corridor which would connect a deep-sea port located at Grays Bay on the Coronation Gulf to the northern end of the Tibbitt-Contwoyto Winter Road which is located at the former Jericho Mine in the Kitikmeot region of Nunavut. The road would be an all weather road 230 km long. The deep-sea port would be the first deep-sea port in the Canadian Central Arctic. It is noted that this project has not been approved by the Nunavut Water Board at this point and the application is for feasibility of the deep-sea port and road. This application is to aid the Grays Bay Road and Port Project.

The proposed deep-sea port geographical coordinates are 505441.56 E / 7521154.57 N which is approximately 180 km east of Kugluktuk Nunavut. The southern end of the road geographical coordinates are 479617.47 E / 7319795.35 N which is approximately 400 km northeast of Yellowknife at Jericho Mine site. The Project are will primarily be accessed by helicopter however other sites can be reached by fixed wing aircraft, boat or snowmobile.

The Project will consist of workers collecting biophysical environmental data, to maintain existing and install new scientific instrumentation required to support environmental data collection, and undertake design-related studies including geotechnical drilling, geochemical assessment of quarries, terrain stability and permafrost assessments, as well as terrestrial



wildlife surveys, marine mammal studies, marine and freshwater aquatic life surveys, marine and freshwater sediment and water sampling, meteorological instrument installation maintenance and replacement, vegetation and rare plant surveys, validate eco mapping results, identify unique and uncommon plant communities, identify traditional use plant occurrences, ambient noise studies, oceanographic studies, and archaeological studies. It is also noted that no permanent infrastructure is being proposed to support this program.

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 |
|-----------------------|--|
| R1 | Fuel Management Plan |
| R2 | Storage Within 31 meters of Water Bodies |
| R3 | Ice Strip and Ice Pad Location |
| R4 | Open Burning |
| R5 | Secondary Containment |
| R6 | Waste Management Plan |
| R7 | Spill Management Materials |

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 |
|--|--|
| 241206 8BD-GBR---- Application for Water Licence-IMLE | West Kitikmeot Resources Corp., December 6, 2024 |
| 241206 8BD-GBR---- Application_Representative-IMLE | West Kitikmeot Resources Corp., December 6, 2024 |
| 241206 8BD-GBR---- Baseline_EngagementLog-IMLE | West Kitikmeot Resources Corp., N.D. |
| 241206 8BD-GBR---- Baseline_ImpactMitigations-IMLE | West Kitikmeot Resources Corp., N.D. |
| 241206 8BD-GBR---- Baseline_Map_Overview-IMLE | Nunami Stantec Limited, November 5, 2024 |
| 241206 8BD-GBR---- Baseline_Maps_Detail_1-IMLE | Nunami Stantec Limited, November 5, 2024 |
| 241206 8BD-GBR---- Baseline_Maps_Detail_2-IMLE | Nunami Stantec Limited, November 5, 2024 |
| 241206 8BD-GBR---- Baseline_Maps_Detail_3-IMLE | Nunami Stantec Limited, November 5, 2024 |
| 241206 8BD-GBR---- Baseline_Maps_Detail_4-IMLE | Nunami Stantec Limited, November 5, 2024 |
| 241206 8BD-GBR---- Baseline_ProjectSummary_EN-IN-IQ-IMLM | West Kitikmeot Resources Corp., N.D. |
| 241206 8BD-GBR---- Closure&ReclamationPlan-IMLE | West Kitikmeot Resources Corp., October 15, 2024 |
| 241206 8BD-GBR---- EnvironmentalMgmtPlan-IMLE | West Kitikmeot Resources Corp., October 11, 2024 |
| 241206 8BD-GBR---- IncorporationCert-IMLE | Registrar of Corporations Nunavut, November 24, 2023 |
| 241206 8BD-GBR---- NPC Baseline-IMLE | Nunavut Planning Commission, September 20, 2024 |



| Document Title | Author, File No., Rev., Date |
|---|---|
| 241206 8BD-GBR---- ProjectProposal-IMLE | West Kitikmeot Resources Corp., N.D |
| 241206 8BD-GBR---- SpillContingencyPlan-IMLE | West Kitikmeot Resources Corp., October 15, 2024 |
| 241206 8BD-GBR---- WasteMgmtPlan-IMLE | West Kitikmeot Resources Corp., October 11, 2024 |
| 250205 8BD-GBR---- BAU NWB Authorization Letter for WKR_2025-IMLE | Blue Star Gold Corp., February 5, 2025 |
| 250218 8BD-GBR---- 250218-24YN049-Cover Ltr Re Screening Decision Report-OT9E | Nunavut Impact Review Board, February 18, 2025 |
| 250218 8BD-GBR---- 250218-24YN049-Notice of Release of SDR-OMRE | Nunavut Impact Review Board, February 18, 2025 |
| 250218 8BD-GBR---- 250218-24YN049-Screening Decision Report-OT9E | Nunavut Impact Review Board, February 18, 2025 |
| 250218 8BD-GBR---- Distribution Review NPC NIRB Received-OLAE | Nunavut Water Board, February 18, 2025 |
| 250218 8BD-GBR---- notice-OLAE | Nunavut Water Board, February 18, 2025 |



C. RESULTS OF REVIEW

1. Fuel Management Plan

Comment:

CIRNAC notes that there is currently no Fuel Management Plan. Information regarding fuel storage, removal and spills can be found in other plans however if the project progresses into a larger scale operation it is useful to have a sperate plan in place with information regarding one of the main hazardous materials one place.

Recommendation:

(R-01) CIRNAC recommends that the applicant consider creating and submit a fuel management plan to the Nunavut Water Board for review in future years.

2. Storage Within 31 meters of Water Bodies

Comment:

It is unclear if materials will be stored at any point within 31 meters of the normal high water mark of a waterbody or on ice. The concern is that if materials are stored or otherwise within 31 meters of a water body that materials can find its way into the water body.

Recommendation:

(R-02) CIRNAC recommends that the applicant confirm that no materials will be stored for within 31 meters of the normal high water mark of a water body nor on ice.

3. Ice Strip and Ice Pad Location

Comment:

In the document labeled Application for Water Licence it states that

“Up to 299 m³/day industrial (drilling, ice pad construction, ice strip maintenance)”.

It is unclear where the locations of the proposed ice strip and ice pad are. Depending on the location of the ice strip, sea water may be more appropriate/ available than fresh water.

CIRNAC seeks clarity on the proposed locations and cumulatively the amount of water to be used in the construction of these items given the 299 m³/day limit imposed by the license.



Recommendation:

(R-03) CIRNAC recommends that the applicant clarify the locations proposed for building an ice strip and ice pad.

4. Open Burning

Comment:

In the Waste Management Plan under section 3 it states that;

“Open burning is limited; solid wastes that are conditionally suitable for open burning are large or bulky paper products, paperboard packaging and untreated wood.”

CIRNAC does not support open burning as contaminants may make entry into nearby water bodies.

Recommendation:

(R-04) CIRNAC broadly recommends that applicants not open burn any materials.

5. Secondary Containment

Comment:

In Table 3.1 in the Spill Contingency Plan it shows that: various lubricants, greases, coolants, waste oil and related products (filters, rags), drill additives, spent spill response materials, and hazardous waste materials will be stored in a designated area.

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| | | | | |
|--|--------------------------|---|-----------------------------------|-----------------|
| Various lubricants, greases and coolants | Up to 180 gal (36 pails) | 5 gal pails | Drills | Designated area |
| Waste oil and related products (filters, rags) | Various | 205 L drums, lined mega bags or similar | Staged at drill site for backhaul | Designated area |

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|---|--------------------------|---|-----------------------------------|-----------------|
| Drill additives | Up to 180 gal (36 pails) | 5 gal pails | Drills | Designated area |
| Spent spill response materials | Various | 205 L drums or lined mega bags | Staged at drill for backhaul | Designated area |
| Hazardous waste for backhaul and offsite disposal | Various | 205 L drums, lined mega bags, or other TDG-approved container | Staged at drill site for backhaul | Designated area |

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It is unclear if these materials will be kept within secondary containment. The concern is that if these materials are not stored within secondary containment units that if spilt they can find their way into the environment and eventually into water bodies.

Recommendation:

(R-05) CIRNAC recommends that the applicant confirm that these items will be kept within secondary containment prior to proper disposal off site.

6. Waste Management Plan

Comment:

The Waste Management Plan does not state where the waste and hazardous waste is going to be held or how it is going to be held. There is also no mention of what kind of incinerator will be used. The concern is that without a proper waste management it is possible for waste to enter the environment and eventually make its way into nearby water bodies.

Recommendation:

(R-06) CIRNAC recommends that the applicant provide information in the waste management plan on the make and model of incinerator to be used, how each type of waste will be sorted and held and the location of where this activity will be undertaken.

7. Spill Management Materials

Comment:

The Spill Contingency Plan mentions that if there is a spill that goes under the ice that they would drill through the ice using an ice auger and chain saws. It is unclear where those items be stored or located in the event of a spill. The concern is that an individual trying to remediate a release under ice that locating and transporting these items will take extra time and in turn the spill may spread further.

Recommendation:

(R-07) CIRNAC recommends that the applicant include in their spill kits when drilling on ice these items to ensure that their response to a spill on ice is not delayed.