



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

Your file - Votre référence  
2BE-YAT----  
Our file - Notre référence  
GCDocs# 134085847

March 5, 2025

Robert Hunter  
Licensing Administrator  
Nunavut Water Board  
P.O. Box 119  
Gjoa Haven, NU, X0B 1J0  
E-mail: [licensing@nwb-oen.ca](mailto:licensing@nwb-oen.ca)

**Re: Crown-Indigenous Relations and Northern Affairs Canada's Review of the  
Licence New Application for the Yath Project, Type B Water Licence No. 2BE-  
YAT----**

Dear Robert,

Thank you for the January 29, 2025 invitation to review the referenced licence application, submitted by Generation Uranium Inc., for Type B Water Licence No. 2BE-YAT----

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](mailto:Joyce.Demers@rcaanc-cirnac.gc.ca) or Andrew Keim at (867) 975-4550 or [Andrew.Keim@rcaanc-cirnac.gc.ca](mailto:Andrew.Keim@rcaanc-cirnac.gc.ca).

Sincerely,

Joyce Demers, B.Sc.,  
Industrial Coordinator



## **Technical Review Memorandum**

**Date:** March 5, 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 Licence New Application for the Yath Project, Type B Water Licence  
No. 2BE-YAT----**

**Region:** ☐ Kitikmeot ☒ Kivalliq ☐ Qikiqtani

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### **A. BACKGROUND**

Generation Uranium Inc. (Generation Uranium) has submitted a new 5 year water licence application called the Yath Project located between the geographical coordinates between latitudes 62°32' and 62°40' North and longitudes 98°36' and 99°12' West. The project is located 230 km southwest of Baker Lake and 350km west of Rankin Inlet in the Kivalliq region of Nunavut.

The water licence application is for a type B water licence with a maximum of 299 m<sup>3</sup>/day of water where 10 m<sup>3</sup>/day will be used for camp purposes and 289 m<sup>3</sup>/day will be used for drilling activities. The location of the water sources are yet to be determined however they will be near the drilling pads and camp.

The project will consist of a 10-15 person exploration camp with a fuel cache, mineral exploration including: diamond drilling, land and on-ice drilling, geological mapping, prospecting, geochemical sampling, ground based and airborne geophysical surveys and confirmation of historic drill hole locations. They will also explore possible extensions and related mineralization to the historic Lac Cinquante Uranium Deposit located southeast of the Property.

Once Generation Uranium has found a suitable camp site and drill targets, the locations will be submitted to the NWB for approval before ground disturbance or construction. Generation Uranium has 9 mineral claims in that area one of them being uranium. Exploration will be conducted yearly between January to September. All exploration and permitting are completed by APEX Geoscience.



The camp will consist of insulated tents with plywood floors for sleeping tents, an office, core tent, first aid station, kitchen, a dry tent with showers, storage, packo toilets and a generator building. The camp will also have a helicopter landing area and a garbage incineration area. The fuel cache will hold up to 500 drums of fuel and 20 100lbs cylinder propane tanks.

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                    | Contact Information for CIRNAC             |
| R2                    | Waste Storage                              |
| R3                    | Abandonment and Restoration Plan           |
| R4                    | Open Burning                               |
| R5                    | Seasonal Shutdown                          |
| R6                    | Bioremediation - Landfarm                  |
| R7                    | Helicopter Landing Area and Airplane Strip |
| R8                    | Spill Contingency Plan                     |
| R9                    | Reporting Threshold Guidelines             |
| R10                   | Property Radiation Hazard Control Plan     |
| R11                   | Possible Radiated Water from Washing       |

**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                    |
|---|---|
| 250127 2BE-YAT---- 181121 - Certificate of Incorporation-ILAE                               | Province of British Columbia, November 21, 2018 |
| 250127 2BE-YAT---- 221213 - Certificate of Change of Name-ILAE                              | Province of British Columbia, December 13, 2022 |
| 250127 2BE-YAT---- 240130 - Certificate of Change of Name-ILAE                              | Province of British Columbia, January 30, 2024  |
| 250127 2BE-YAT---- 240624 - GEN Yath Property Medical Evacuation Plan-ILAE                  | Generation Uranium Inc., May 17, 2024           |
| 250127 2BE-YAT---- 240626 - GEN Yath Property Location & Mineral Tenure Figure-ILAE         | Apex Geoscience Ltd., June 2024                 |
| 250127 2BE-YAT---- 240806 - NPC File # 150437 [Yath Property]-ILAE                          | Nunavut Planning Commission, August 6, 2024     |
| 250127 2BE-YAT---- 240816 - GEN Yath Property Non-Technical Summary - English-ILAE          | N.A., N.D.                                      |
| 250127 2BE-YAT---- 240829 - GEN Yath Property Abandonment & Restoration Plan-ILAE           | Generation Uranium Inc., August 1, 2024         |
| 250127 2BE-YAT---- 240829 - GEN Yath Property Fuel Management Plan-ILAE                     | Generation Uranium Inc., August 1, 2024         |
| 250127 2BE-YAT---- 240829 - GEN Yath Property Radiation Hazard Control Plan-ILAE            | Generation Uranium Inc., August 1, 2024         |
| 250127 2BE-YAT---- 240930 - GEN Interim Financial Statements-ILAE                           | Generation Uranium Inc., N.D.                   |
| 250127 2BE-YAT---- 241201 - GEN Yath Property Environmental & Wildlife Management Plan-ILAE | Generation Uranium Inc., August 1, 2024         |
| 250127 2BE-YAT---- 241210 - GEN Yath Property Spill Contingency Plan - Part 1-ILAE          | Generation Uranium Inc., August 1, 2024         |
| 250127 2BE-YAT---- 241210 - GEN Yath Property Spill Contingency Plan - Part 2-ILAE          | Generation Uranium Inc., N.D.                   |
| 250127 2BE-YAT---- 241211 - 24EN039 - NIRB Screening Decision Report-ILAE                   | Nunavut Impact Review Board, December 11, 2024  |
| 250127 2BE-YAT---- 250115 - GEN Yath Property 3rd Party Reclamation Cost Estimate-ILAE      | Generation Uranium Inc., 2025                   |
| 250127 2BE-YAT---- 250115 - GEN Yath Property Waste Management Plan-ILAE                    | Generation Uranium Inc., August 1, 2024         |
| 250127 2BE-YAT---- 250120 - GEN Yath Property Remote Camp Supplementary Questionnaire-ILAE  | Apex Geoscience Ltd., N.D.                      |



| Document Title   | Author, File No., Rev., Date           |
|--|--|
| 250127 2BE-YAT---- 250127 - GEN Yath Property General Water Licence Application-ILAE | Apex Geoscience Ltd., January 27, 2025 |
| 250127 2BE-YET---- Generation Uranium Inc. Application Summary-ILAE                  | Apex Geoscience Ltd., January 27, 2025 |
| 250128 2BE-YAT---- GEN authorization letter-ILAE                                     | Christopher Huggins, January 28, 2024  |
| 250129 2BE-YAT---- Distribution Review NPC NIRB Received-OLAE                        | Nunavut Water Board, January 29, 2025  |
| 250129 2BE-YAT---- Notice-OLAE   | Nunavut Water Board, January 29, 2025  |



## **C. RESULTS OF REVIEW**

### **1. Contact Information for CIRNAC**

#### **Comment:**

Contact information for CIRNAC needs to be reviewed updated as some of the numbers provided are no longer in use. The concern is that in the event that CIRNAC needs to be contacted the applicant will not have the correct numbers to reach the desired personnel.

#### **Recommendation:**

(R-01) CIRNAC recommends that the applicant update CIRNAC contact numbers in all applicable plans.

### **2. Waste Storage**

#### **Comment:**

It is unclear how waste management streams will be managed such as where and how waste will be stored. The concern is that they may be stored within 31 meters from the normal highwater mark of a water body which may increase the changes of waste ending up in waterbodies.

#### **Recommendation:**

(R-02) CIRNAC recommends that the applicant confirm that all waste types will be stored a minimum of 31 meters from the normal high water mark of any water body, and that the location of all waste types be identified once the camp is constructed.

### **3. Abandonment and Restoration Plan**

#### **Comment:**

The Abandonment and Restoration Plan under sections 1.1 and 1.2 states that

“1.1. Vehicles and Equipment

No equipment currently exists on the Property.

1.2. Drilling Equipment

No drilling equipment exists on the Property.”

These sections will need to be updated to reflect actual conditions.



**Recommendation:**

(R-03) CIRNAC recommends that in future iterations of the Abandonment and Restoration Plan include updated sections 1.1 and 1.2.

**4. Open Burning**

**Comment:**

The Abandonment and Restoration Plan under section 4.4 states that

“Combustible Waste: All combustible waste will be incinerated. Untreated wood and large pieces of cardboard will be burned in a controlled open burn in compliance with the Municipal Solid Wastes Suitable for Open Burning Guidelines.”

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

**Recommendation:**

(R-04) CIRNAC recommends that if open burning is permitted under the licence that applicants follow GN guidelines as well as other related regulations and guidelines.

**5. Seasonal Shutdown**

**Comment:**

Unclear if all waste will be removed from the site prior to shutdown. The concern is that waste, if let unattended, will end up into nearby water bodies.

**Recommendation:**

(R-05) CIRNAC recommends that the applicant confirm is all waste will be removed prior to seasonal shutdowns.



## 6. Bioremediation - Landfarm

### **Comment:**

In the Abandonment and Restoration Plan under section 4.6 Bioremediation it states that

“At the advice, discretion and approval of land use inspectors and permitting or licensing authorities’, bioremediation, or land farming, may be implemented to treat certain contaminated soils temporarily contained in sealed drums on the Property”.

It is unclear if the applicant is also seeking for a landfarm to be constructed at an un-known location at this time.

### **Recommendation:**

(R-06) CIRNAC recommends that the applicant provide clarity on if they are also requesting to build a landfarm at a later date.

## 7. Helicopter Landing Area and Airplane Strip

### **Comment:**

The Abandonment and Restoration Plan under section 3.1 states that there will be a helicopter landing area however the third party reclamation cost documents states prices for fixed-wing flights however it is unclear how they would be able to land if the property does not have an airstrip.

The Fuel Management Plan states under section 5 that

“Fuel will be transported to the Property via fixed-wing aircraft ...”.

However, the application to the Nunavut Water Board only includes a helicopter landing area. It is unclear if the applicant is also applying for an airstrip to be constructed at this time.

### **Recommendation:**

(R-07) CIRNAC recommends that the applicant clarify if only a helicopter landing area will be developed or if they intent to construct an all weather strip or an interim ice strip, neither of which appear in their application. If both are to be constructed then appropriate plans must be updated to reflect the change.





## 8. Spill Contingency Plan

### **Comment:**

- a. CIRNAC notes that some of the pages for the MSDS are upside down.
- b. CIRNAC notes that in section 6.2 under step 2 of the spill contingency plan that it states that “Complete and Fax a copy of the Spill Report Form (Appendix I).” however the spill report form is located in appendix 2.

### **Recommendation:**

(R-08) CIRNAC recommends that in future iterations that the MSDS be right side up in future iterations of the Spill Contingency Plan and that the appendix number be corrected.

## 9. Reporting Threshold Guidelines

### **Comment:**

The spill contingency plan under section 5 states that

“... every spill that meets the guideline threshold must be reported”.

CIRNAC notes that the table of reportable spills amount are not included in this iteration of the Spill Contingency Plan and notes that there is no mention in the plan that all spills near or in water of any amount must be reported. Although CIRNAC understands that the onus to report there spills is on the applicant it would make reporting requirements easier to find and report on in the event of a spill.

### **Recommendation:**

(R-09) CIRNAC recommends that the Spill Contingency Plan be updated to include a line stating that all spills near or in water of any amount must be reported and that in future iterations that the reporting table be added. Further, CIRNAC continues to support the all spills are reported requirement contained with the water License that requires Licensees to log all spills and to report those that meet the guidelines to the Spill line.

## 10. Property Radiation Hazard Control Plan

### **Comment:**

The Property Radiation Hazard Control Plan submitted to the Nunavut Water Board seems to be a draft version with comments that need to be addressed.



**Recommendation:**

(R-10) CIRNAC recommends that the applicant edit the plan to address comments addressed in the plan insuring that the revision control table is updated to reflect changes done to the plan. A final Plan is to be provided for review before a license should be issued.

**11. Possible Radiated Water from Washing**

**Comment:**

The Property Radiation Hazard Control Plan under section 6.3 states that

“ Check field clothes periodically with a scintillometer. Rinse clothes at site if reading is greater than 100 CPS above background levels and continue rinsing until readings fall below the acceptable level.”

It is unclear where this rinsed water will go or if any testing will be conducted to ensure that this water can be appropriately stored and disposed of.

The plan also states in several places that handwashing will be utilized to ensure personnel health and safety however it does not state where this will occur or where or how the water will be stored and handled.

It is also unclear what will happen to PPE that cannot be washed which have radiation on them where or how will be stored.

What is the concern is that without a clear plan in place that radiated products may be within 100 meters from the normal high water mark of any water body.

**Recommendation:**

(R-11) CIRNAC recommends that the applicant confirm where the rinsing activity will be done, where this water/other PPE which cannot be clean will be held and how it will be stored.