

March 12, 2025



Nunavut Water Board
PO Box 119
Gjoa Haven, NU
X0B 1J0

NIRB File No.: 24YN049
NPC File No.: 150391
NWB File No: 8BD-GBR----

Attention: Robert Hunter, Licensing Administrator

Re: Opportunity to Address Comments Received Regarding West Kitikmeot Resources Corp.'s New Type B Water Licence Application file number 8BD-GBR----

Dear Mr. Hunter,

Thank you for the opportunity to address the questions raised from the comment submissions during the public review of West Kitikmeot Resources Corp's new Type B Water Licence Application (file number 8BD-GBR----).

As requested by the Nunavut Water Board (NWB), West Kitikmeot Resources (WKR) has reviewed the recommendations submitted by the Kitikmeot Inuit Association, Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC), and Fisheries and Oceans Canada (DFO) and provides the following responses for consideration. Recommendations are noted in **bold**, and responses are *italicized* for clarity. Environment and Climate Change Canada (ECCC) also reviewed this file and have no comments at this time.

Kitikmeot Inuit Association

1. Communication Strategy

Recommendation:

It is recommended that a strong communication strategy be created to ensure that Inuit are aware of what is being sampled, when they will be sampled and why the samples are being collected. This will help bring clarification for Inuit who may be in the area while West Kitikmeot Corp's research activities take place and there are no misunderstandings on the type of research activities being conducted.

WKR engages routinely with Kitikmeot Inuit, including the KIA, hunters and trappers organizations and the public, regarding its current and planned activities, pursuant to WKR's Kitikmeot Communities

Engagement Plan. The Kitikmeot Communities Engagement Plan outlines who WKR will talk to about the Grays Bay Road and Port Project and how information will be shared. WKR has shared information about what is being sampled, when it will be sampled, and why the samples are being collected during our community engagement sessions in 2024 and is happy to share more details about our plans with the communities as requested.

2. Waste Management

Recommendation:

With regards to waste management, KIA requires an effluent discharge criterion to determine what type of effluent will be discharged to the environment, along with the locations where the effluent will be discharged.

As outlined in its Waste Management Plan, the type of effluent that WKR intends to discharge to the environment is limited to precipitation that may have accumulated within the fuel cache berms. This accumulated precipitation is collected, subject to treatment through an activated carbon filter and sampled for analysis prior to discharge. Filtrate that complies with section 3.10.3(1) of Environmental Code of Practice for Aboveground and Underground Storage Tank Systems Containing Petroleum and Allied Petroleum Products (Code of Practice; CCME 2003¹), being 15 mg/L free oil and grease, will be discharged to the land, proximal to the fuel cache. Filtrate that does not comply with the Code of Practice criteria is transferred offsite for appropriate treatment and disposal, as noted in WKR's Waste Management Plan.

3. Water Withdrawal

Recommendation:

KIA requests a description of procedures to determine the capacity of individual watercourses that may be used along the route and to determine appropriate pumping rates and volumes applicable to the specified water bodies.

WKR does not intend to withdraw freshwater for the current scope of work in 2025. All water withdrawals for our 2025 research program will be seawater only, as drilling is limited to the port area in 2025. Should geotechnical drilling be planned elsewhere in future years, upcoming plans, including approximate locations of drill targets, are communicated to the KIA in accordance with Kitikmeot Communities Engagement Plan. Related, should freshwater withdrawals be required in future years, WKR does not plan to withdraw more than 10% of the available volume of a water course. The available volume of a water course is determined either by direct measurement, or conservative modelling based on GIS, LiDAR and field observations, and takes into consideration seasonal factors such as ice thickness. Pumping rates employed may vary with pump used, however these are typically very low flow pumps with screened intakes, and are intended to be protective of fish.

¹ Canadian Council of Ministers of the Environment (CCME). 2003. Environmental Code of Practice for Aboveground and Underground Storage Tank Systems Containing Petroleum and Allied Petroleum Products. PN 1326. Winnipeg, MB. Current to October 2015.

4. Inspections

Recommendation:

It is also recommended that KIA conduct inspections that include monitoring drill sites, seasonal closure activities, waste storage areas and camps to ensure any damage to the environment will be reported and remediated.

WKR looks forward to hosting all Inspectors at its respective licenced and permitted work areas. WKR plans to carry out its activities and related reporting, including drilling, waste management, closure and reclamation, in accordance with its approved management plans and the terms and conditions of its applicable authorizations. WRK notes that a camp is outside the scope of the application for 8BD-GBR----

CIRNAC

1. Fuel Management Plan

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.

WKR has considered CIRNAC's recommendation for the creation of a fuel management plan and agrees that such a plan may be warranted in the future; should its fuel volume or container size increase and a related amendment to the water licence be required, WKR is open to submitting a fuel management plan as needed. Given the current program scope of operations, WKR is confident that the submitted Spill Contingency Plan, any related water licence terms and conditions and its continued dialogue with the Inspector are administratively appropriate and adequate to ensure compliance and environmental protection.

2. Storage Within 31 meters of Water Bodies

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.

WKR confirms that no materials will be stored within 31 meters of a water body's normal high water mark or on ice.

3. Ice Strip and Ice Pad Location

Recommendation:

(R-03) CIRNAC recommends that the applicant clarify the locations proposed for building

an ice strip and ice pad.

WKR does not intend to build an ice strip or ice pad for the current scope of work in 2025. Should one be required in future years, WKR will clarify the proposed locations with the inspector before construction. WKR commits to freshwater use within its licenced limits.

4. Open Burning

Recommendation:

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

WKR agrees that it will not open burn any materials as a general practice but rather manage these materials along with its other waste streams. WKR would like the flexibility to undertake open burning on a case-by-case basis as discussed in advance with the Inspector and accordingly approved in writing. WKR commits to update the Waste Management Plan accordingly, prior to the start of the Program.

5. Secondary Containment

Recommendation:

(R-05) CIRNAC recommends that the applicant confirm that these items (various lubricants, greases, coolants, waste oil and related products (filters, rags), drill additives, spent spill response materials, and hazardous waste materials) will be kept within secondary containment prior to proper disposal off site.

WKR confirms that these items will be kept within secondary containment prior to disposal offsite.

6. Waste Management Plan

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.

WKR confirms that incineration is not part of the licence scope. Incineration referred to in the Environmental Management Plan refers to waste management at existing authorized facilities (i.e. Ulu Camp) that it may use over the course of the program. WKR appreciates that this may be confusing, and accordingly commits to updating the Environmental Management Plan for clarity prior to the start of the field program,

7. Spill Management Materials

Recommendation:

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

WKR will include ice augers and chainsaws in their spill kits when drilling on ice to ensure that their response to a spill on ice is not delayed.

DFO

1. Winter Water Withdrawal:

Recommendation:

For water withdrawal from lakes, DFO recommends the proponent conforms with DFO's Protocol for Winter Water Withdrawal from Ice-covered Waterbodies in the Northwest Territories and Nunavut (2010). For water withdrawal from watercourses, DFO recommends the proponent follow the Framework for Assessing the Ecological Flow Requirements to Support Fisheries In Canada (<https://waves-vagues.dfo-mpo.gc.ca/Library/348881.pdf>) and demonstrates that water withdrawal rate remains <10% of actual (instantaneous) flow and does not result in flows <30% of mean annual discharge (MAD).

When withdrawing from lakes, WKR will conform with DFO's Protocol for Winter Water Withdrawal from Ice-Covered Waterbodies in the Northwest Territories and Nunavut. For withdrawals from watercourses, WKR will follow the Framework for Assessing the Ecological Flow Requirements to Support Fisheries in Canada and demonstrate that the water withdrawal rate remains <10% of the actual (instantaneous) flow and does not result in flows <30% of the mean annual discharge (MAD).

2. Fish Impingement and Entrainment:

Recommendation:

DFO recommends adhering to DFO's Interim code of practice: End-of-pipe fish protection screens for small water intakes in freshwater available at <https://www.dfo-mpo.gc.ca/pnw-ppe/codes/screenecran-eng.html> when using fish screens, if water intake flow rate is up to 0.150 m3/s, or 150 litres per second (L/s).

WKR will adhere to DFO's Interim code of practice: End-of-pipe fish protection screens for small water intakes in freshwater when using fish screens, if water intake flow rate is up to 0.150 m3/s, or 150 litres per second (L/s).

3. General Impacts to Fish and Fish Habitat:

Recommendation:

In order to comply with the Fisheries Act, it is recommended that the Proponent follow DFO's protective measures for fish and fish habitat and standard codes of practice which can be found on DFO's website (<https://www.dfo-mpo.gc.ca/pnw-ppe/measures-mesureseng.html> and

WKR will follow DFO's protective measures for fish and fish habitats and standard codes of practice.

Recommendation:

Proponents are also asked to respect the Nunavut in-water works restricted activity timing windows <https://www.dfo-mpo.gc.ca/pnw-ppe/timing-periodes/nu-eng.html>. By doing so, works, undertakings or activities with potential impacts to fish and fish habitat can be avoided by protecting fish during spawning and incubation periods when spawning fish, eggs and fry are vulnerable to disturbance.

WKR will respect the Nunavut in-water works restricted activity timing windows.

Recommendation:

If the proposal meets the criteria for a site specific review, as described on DFO's website (<https://www.dfo-mpo.gc.ca/pnw-ppe/reviews-revues/request-review-demande-dexamen-003-eng.html>), Proponents should complete and submit the request for review form available on the website (<https://www.dfo-mpo.gc.ca/pnw-ppe/reviews-revues/request-review-demande-dexamen-004-eng.html>).

WKR has discussed its proposed scope of work with DFO, and it has been determined that a site-specific review is not required.

Recommendation:

It is the proponent's Duty to Notify DFO if they have caused, or are about to cause, the death of fish by means other than fishing and/or the harmful alteration, disruption or destruction of fish habitat. Such notifications should be directed to DFO.ARCEM.Triage-TriageGEARC.MPO@dfo-mpo.gc.ca.

WKR will notify DFO if they have caused, or are about to cause, the death of fish by means other than fishing and/or the harmful alteration, disruption or destruction of fish habitat.

We thank you for the opportunity to comment and look forward to the ongoing discussion on the Field Research Program for the Grays Bay Road and Port Project.

Yours truly,



Gavin Law
Manager, Environment
West Kitikmeot Resources Corp.

Cc: Elliot Holland, Chief Operating Officer, West Kitikmeot Resources Corp
Kassidy Koaha-Laube, Community Engagement Coordinator, West Kitikmeot Resources Corp
Sharleen Hamm, Applicant Representative, Sharleen Hamm Consulting Ltd
Karén Kharatyan, Director of Technical Services, Nunavut Water Board
Mohammad Ali Shaikh, Technical Advisor, Nunavut Water Board
Richard Dwyer, Manager of Licensing, Nunavut Water Board
Jennifer Amagoalik, Project Officer, Kitikmeot Inuit Association
James Bolt, Resource Management Officer, Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC)
Russell Wykes, Senior Environmental Assessment Officer, Environment and Climate Change Canada / Government of Canada