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Kugluktuk

Bay Chimo
Umingmactok
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Taloyoak

Kugaaruk

Robert Hunter
Licensing Administrator
Nunavut Water Board
P.O. Box 119
Gjoa Haven, Nunavut
X0B 1J0

Sent by e-mail: Robert Hunter – Robert.hunter@nwb-oen.ca

March 10, 2025

RE: (8BD-GBR----) Type B Water License Application for Grays Bay Road and Port Project

Dear Rober Hunter,

The Kitikmeot Inuit Association's (KIA) consultants in freshwater and marine water quality, quantity, hydrology, lower trophic levels, fisheries and freshwater fish habitats have reviewed the proposed Type B Water License Application for the Grays Bay Road and Port Project, and their comments are in the enclosed screening forms.

Our consultants' comments pertain to the areas of freshwater and marine water quality; hydrology; quantity; lower trophic levels; fisheries, and fish habitat impacts to freshwater environments.

In summary, the baseline data collection and studies within the Grays Bay Road and Port – Research Project area show that the risk of long-term environmental degradation is not significant if the Research is conducted in accordance with KIA recommendations below.

It is also noted that clarification is required regarding the location of drill sites, determination of quantity of water withdrawal or available capacity, and to explain how streams and small lakes are identified within the license application.

Primary consideration should be to ensure that the monitoring plans accurately reflect the predevelopment environment and to monitor the environmental changes where development will take place. Plans with specific details on when and where samples will be collected should be reviewed through these monitoring plans.

KIA Recommendations:



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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.

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.

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

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.

The KIA looks forward to conducting further reviews of the project and participating in the NWB process to determine impacts and potential mitigation measures for the environment and KIA rights.

Thank you.

Jennifer Amagoalik

Acting Senior Project Officer
Kitikmeot Inuit Association, Department of Lands, Environment and Resources

Cc Wynter Kuliktana, Director, KIA, Department of Lands and Environment



Memorandum

Date: March 7, 2025
To: Jennifer Amagoalik and John Roesch (Kitikmeot Inuit Association)
From: Jo-Anne Lane, Richard Nesbitt (Hutchinson Environmental Sciences Ltd.)
Re: Summary Aquatics Review of Grays Bay Port and Road Type B Water Licence Application

Hutchinson Environmental Sciences Ltd. (HESL) was retained by the Kitikmeot Inuit Association (KIA) to complete a high-level review of West Kitikmeot Resources Corporation's (WKR) project proposal and associated management plans submitted to both the Nunavut Impact Review Board (NIRB; currently under review) and to the Nunavut Water Board (NWB) for this Type B Water Licence Application. Our review was discipline specific within the bailiwick of freshwater and marine water quality, quantity, hydrogeology and lower trophic levels. The proposal includes activities associated with baseline data collection in the marine and freshwater environments, implementation of a drilling program, and storage of associated equipment, fuel and waste. The proposal also includes seasonal closure measures and spill contingency. We note that specifics of the field programs were not presented within this application.

Baseline data collection: Collection of samples from water courses, waterbodies and the marine environment to develop robust baseline dataset;

- Short- and long-term environmental impacts are not expected from collecting samples in the aquatic environment samples (noting fisheries sampling programs are discussed separately by Palmer/SLR).
- Primary consideration should be ensuring the monitoring plans are robust and accurately characterize the predevelopment geographic and temporal variability of the aquatic environment along the infrastructure corridor, particularly proximal to where future development may be expected and where long-term camps may be situated. *When available, plans with specific details on where and when samples will be collected should be reviewed through this lens.*
- A strong communication strategy should be pursued to ensure Inuit are aware where and why samples are being collected to minimize chances field programs will be misinterpreted to indicate there are hazards in the aquatic environment that should be avoided when conducting traditional land use practices.

Drilling: Operation of drilling rigs and drill brines; and

- Operation of drill rigs incurs some environmental risk associated with residual bore holes and brine. Some residual scarring from salt brines is likely inevitable.
- Other impacts may include permafrost thaw, subsidence and rutting.
- Risks can be minimized and mitigated through robust management plans; successful implementation will vary by organization and operator. *KIA should be prepared to conduct periodic inspections of drill sites to evaluate whether implementation of spill and waste management plans, and seasonal closure activities have been successful.*
- Additional waste management is discussed in the next section.

Waste Management: Liquid and solid waste generated by field personnel, hazardous waste (primarily fuels machinery and field camp).

- Plans indicate waste and hazardous materials (primarily fuels) will be stored within containment infrastructure (e.g., on appropriate laydowns) and within berms when possible. Waste will also be backhauled on a regular basis, minimizing risks to the environment.
- Effluent will be discharged as per as yet unspecified discharge criteria. *The KIA should be provided with these criteria and the locations where effluent will be discharged for review prior to proceeding with any effluent discharges.*

Seasonal Closure: Tasks required to secure the Program work site(s) upon seasonal closure.

- Plan states that fuel and other materials may remain in fuel caches, waste is managed in accordance with the Waste Management Plan, water pumps are removed and stored on site and drills are deconstructed and removed or stored in a designated area.
- Progressive reclamation occurs concurrently with drilling and fuelling activities. *The KIA should be prepared to inspect the site following seasonal closure.*

Spill Contingency: Applies to baseline field studies on land, in freshwater and in the marine environment, and geotechnical drilling, predominantly in the port area.

- Spills may remain fairly localized if spilled to land. If spilled to water, it may flow downstream into other freshwater or marine environments. *The KIA should be prepared to inspect waste storage areas and camps periodically to ensure any damage to the environment is appropriately reported on and remediated.*

The activities associated with the Water Licence application include Impact Mitigation Summary, a Waste Management Plan, Spill Contingency Plan and Closure and Reclamation Plan. The measures outlined in these plans are well understood and are effective standard best management practices. The risk of long-term environmental degradation is not significant. While specific field program plans should be submitted for review once available, particularly as this project proposal represents the first step in unlocking the significant development potential in the region, the activities described within the application can be supported by KIA without incurring significant liabilities either to the land or local Inuit when appropriate mitigations are implemented.

JAL/ran



March 7, 2025

Attention: Jennifer Amagoalik
Kitikmeot Inuit Association
PO BOX 360
Kugluktuk, NU X0B 0E0

SLR Project No.: 202.089129.00001

Revision: 0

RE: West Kitikmeot Resources Corp. - Grays Bay Road and Port Project (8BD-GBR----) Review of Water Licence Application to the Nunavut Water Board

1.0 Introduction

SLR Consulting Canada Ltd. is pleased to provide this review of a General Water Licence Application (the Application) for the Grays Bay Road and Port Project Field Program (the Program). Our review covers the Application and attachment documents submitted to the Nunavut Water Board (NWB) by West Kitikmeot Resources Corp. (WKRC) for the Program.

2.0 Review Scope

The following document formed the basis for the review:

- West Kitikmeot Resources Corp. 2024. General Water Licence Application: Grays Bay Road and Port Project, Field Research Program.

In addition, 22 documents were provided for information purposes only. These documents are available at <https://public.nwb-oen.ca>:

- West Kitikmeot Resources Corp. 2024. General Water Licence Application: Grays Bay Road and Port Project, Field Research Program.
- West Kitikmeot Resources Corp. 2024. Baseline Application SIG: Grays Bay Road and Port Project, Field Research Program.
- West Kitikmeot Resources Corp. 2024. Baseline Map Overview: Grays Bay Road and Port Project, Field Research Program.
- West Kitikmeot Resources Corp. 2024. Baseline Maps Detail 1: Grays Bay Road and Port Project, Field Research Program.
- West Kitikmeot Resources Corp. 2024. Baseline Maps Detail 2: Grays Bay Road and Port Project, Field Research Program.
- West Kitikmeot Resources Corp. 2024. Baseline Maps Detail 3: Grays Bay Road and Port Project, Field Research Program.
- West Kitikmeot Resources Corp. 2024. Baseline Maps Detail 4: Grays Bay Road and Port Project, Field Research Program.
- West Kitikmeot Resources Corp. 2024. Baseline Project Summary: Grays Bay Road and Port Project, Field Research Program.
- West Kitikmeot Resources Corp. 2024. Baseline Shapefiles: Grays Bay Road and Port Project, Field Research Program.

- West Kitikmeot Resources Corp. 2024. Closure and Remediation Plan: Grays Bay Road and Port Project, Field Research Program.
- West Kitikmeot Resources Corp. 2024. Environmental Management Plan: Grays Bay Road and Port Project, Field Research Program.
- West Kitikmeot Resources Corp. 2024. Certificate of Amendment of Registration of An Extra-Territorial Corporation.
- West Kitikmeot Resources Corp. 2024. NPC Baseline: Grays Bay Road and Port Project, Field Research Program.
- West Kitikmeot Resources Corp. 2024. Project Proposal: Grays Bay Road and Port Project, Field Research Program.
- West Kitikmeot Resources Corp. 2024. Spill Contingency Plan: Grays Bay Road and Port Project, Field Research Program.
- West Kitikmeot Resources Corp. 2024. Waste Management Plan: Grays Bay Road and Port Project, Field Research Program.
- West Kitikmeot Resources Corp. 2024. Blue Star Gold Corp. Authorization Letter for Use of Ulu Camp Facility: Grays Bay Road and Port Project, Field Research Program.
- Nunavut Impact Review Board. 2024. Screening Decision for West Kitikmeot Resources Corp's "Field Research Program for the Grays Bay Road and Port Project" Proposal, Kitikmeot Region.
- Nunavut Impact Review Board. 2024. Notice of Release of Screening Decision Report.
- Nunavut Impact Review Board. 2024. Screening Decision Report.

SLR's review of the Application focuses on hydrology, fisheries, and fish habitat impacts to freshwater environments.

3.0 Review Comments

3.1.1 Water License Application

A Type B Water Licence, issued by the Nunavut Water Board, is required for moderate water use and waste deposit activities. It applies to projects using between 50 and 300 cubic meters of water per day (m³/day), storing 2,500 to 60,000 m³/day, or temporarily altering water flow in a watercourse.

Section 12 - Water Use

The application indicates that water use will occur for "research purposes, geotechnical drilling". It is unclear how this is considered "research purposes" in the context of water withdrawal.

Section 13 – Quantity and Quality of Water Involved

The Application states that water sources to be targeted for water use are proximal to drill targets. However, the Application and reference materials do not specify the location of drill targets along the Grays Bay Road Corridor.

The Application also states that the estimated quantity of water withdrawn will not exceed 299 m³/day and will not exceed 10% of available capacity in a given water body. No information is provided that describes how the quantity of water withdrawal or available capacity will be determined. In the absence of this information, it is not possible to determine if water withdrawals are realistic given the number of water bodies the Application lists.



- **Recommendation:** We recommend that KIA request a description of the procedures that will be followed to determine the available capacity of individual watercourses that may use along the route, as well as to determine appropriate pumping rates/volumes applicable to specific waterbodies. The applicant should be encouraged to provide a framework that can be applied to any waterbody that may be subject to water withdrawals.

Section 4.3 of the Grays Bay Road and Port Project Impact Mitigations Summary⁵ directs that mitigation strategies for impacts to aquatic species, habitat, and mitigation include the avoidance of water withdrawal from streams and small lakes.

- **Recommendation:** We recommend that KIA request clarification on how streams and small lakes will be identified. This may be a component of the general water withdrawal framework discussed in the above recommendation.

4.0 Statement of Limitations

This report has been prepared by SLR Consulting (Canada) Ltd. (SLR) for the Kitikmeot Inuit Association (Client) in accordance with the scope of work and all other terms and conditions of the agreement between such parties. SLR acknowledges and agrees that the Client may provide this report to government agencies, interest holders, and/or Indigenous communities as part of project planning or regulatory approval processes. Copying or distribution of this report, in whole or in part, for any other purpose other than as aforementioned is not permitted without the prior written consent of SLR.

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This report may contain data or information provided by third party sources on which SLR is entitled to rely without verification and SLR does not warranty the accuracy of any such data or information.

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5.0 Closure

Regards,

SLR Consulting (Canada) Ltd.



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