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CIDMS # 1163133

July 21, 2017

Solomon Amuno, PhD
Technical Advisor II
Nunavut Impact Review Board
P.O. Box 1360
Cambridge Bay, NU, X0B 0C0
Via electronic mail to: info@nirb.ca

Re: Notice of Screening for Transition Metals Corporation's "Arcadia Bay Property" Project Proposal

Dear Dr. Amuno,

On July 4, 2017 the Nunavut Impact Review Board (NIRB) invited parties to comment on Transition Metals Corporation's "Arcadia Bay Property" project proposal. Indigenous and Northern Affairs Canada (INAC) appreciates the opportunity to provide comments and offers the response below as it pertains to the NIRB's request:

Whether the project proposal is of a type where the potential adverse effects are highly predictable and mitigable with known technology, (please provide any recommended mitigation measures):

In the "Details Part 2" of the Project Application (Section B: Mineral Exploration: Drilling), the Proponent states:

"If later relocation of the hole is not required, casing will be removed whenever possible. Any remaining/fused casing will be cut off to ground level or below and capped. Any holes with flowing water will be permanently sealed unless written instruction from the relevant authority is received to indicate otherwise."

INAC notes that the commitment to remove or cut down drill casings is included in the Proponent's Abandonment and Restoration Plan (Section 5.2 Buildings, Content, and Fuel), however, the commitment to cap drill holes is not. In order to reduce the impacts to wildlife habitat and to prevent the introduction of contaminants from the surface to the sub-surface, INAC recommends the Proponent ensure that all drill holes be backfilled or capped prior to the end of each field season and upon completion of the project, and that the Proponent include this commitment in their Abandonment and Restoration Plan.



INAC appreciates the opportunity to provide comments and looks forward to working with the NIRB and the Proponent throughout any further review phases related to this project. Should you have any questions, please contact Julia Prokopick at (867) 975-4567 or by e-mail at julia.prokopick@aandc-aadnc.gc.ca.

Sincerely,

Felexce Ngwa
A/Manager, Impact Assessment