



November 15, 2024

Nunavut Impact Review Board  
P.O. Box 1360,  
Cambridge Bay, NU  
X0B 0C0

NIRB File No.: 24XN038  
NPC File No.: 150467

Attention: Kelli Gillard, Senior Impact Assessment Officer

**Re: Opportunity to Address Comments Received Regarding West Kitikmeot Resources Corp.'s "Grays Bay Road and Port" Project Proposal**

Dear Ms. Gillard,

Thank you for the opportunity to address the questions raised from the comment submissions before the Board renders its determination for this screening assessment and issues its subsequent Screening Decision Report to the responsible Minister(s).

As requested by the Nunavut Impact and Review Board (NIRB), West Kitikmeot Resources (WKR) has reviewed the questions raised by the Inuvialuit Game Council, the Government of Northwest Territories and the NIRB and provides the following responses for consideration. Questions are noted in **bold**, and answers are *italicized* for clarity.

**Could WKR verify if there may be constructing or operating a staging area in Tuktoyaktuk for the proposed "Grays Bay Road and Port" project. Please clarify if the staging area is proposed, would it only be used during construction of the proposed project, or used for the life of the project?**

*No staging areas are proposed for construction or operations in Tuktoyaktuk. Staging areas are only proposed to be constructed and operated at the northern and southern terminus of the Grays Bay Road to support port and road construction.*

**Can WKR verify that they are only applying to operate the Port through the open water season and are not applying to operate year-round?**

*The Port facility is expected to be open year-round and will receive vessels during the open water season. The Port will additionally be made available for docking by third-party vessels that have obtained necessary approvals – outside of this application – to travel during the ice season. The Grays Bay Road and Port Project is not requesting approval to ship outside the open water season. An example of third-party vessels that may travel during the ice season is the Canadian Coast Guard, which currently provides icebreaking services from June to November in Nunavut. These Canadian*

*Coast Guard activities support community resupply, environmental response, and search and rescue operations.*

**In the document, there is description of specially outfitted fuel barges frozen in Grays Bay through the pre-construction and construction (referred to as construction). Would WKR be continuing this practice into operations or is this only required for the construction phase?**

*Specially outfitted fuel barges frozen in Grays Bay are only anticipated to be required for construction. Permanent fuel storage and distribution facilities will support operations. Should fuel barges be required to be frozen outside of the construction period, appropriate protective measures will be taken.*

**During construction, WKR has proposed having explosives stored at Grays Bay Port and quarries. The document also describes areas that are set aside for companies to develop for storage of explosives and/or manufacturing facilities for explosives. Does WKR require explosives during operations and would explosives be stored in the areas that were set aside for future users?**

*WKR will require explosives during operations, primarily at permanent quarries, for road surfacing and maintenance. Explosives for use by both WKR and third-party users would be stored in the area noted in Figure 2.1 as “Explosive Storage” and not within the area noted as “3rd Party Operations” near the main port facility.*

**WKR stated that it would be constructing a seven (7) kilometre seasonal ice road between Jericho to join the Tibbitt to Contwoyto Ice Road connecting the Grays Bay Road to southern Canada. According to the literature available, the Tibbitt to Contwoyto Road went to the Lupin Mine for resupply of that project. Jericho used a seasonal ice road from the Lupin Mine to the Jericho Mine in its operations to supply its mine. Can WKR identify who would be constructing operating the ice road between Jericho and the Nunavut/Northwest Territories Border?**

*WKR plans to connect the Project with the Nunavut/NWT border using previously constructed winter road routes. The Project Proposal referred to this entire route as the Tibbitt to Contwoyto Winter Road, but as noted, it is more accurately described as the Lupin to Jericho Extension Winter Road, connecting to the Tibbitt to Contwoyto Winter Road east of Lupin Mine.*

*If third parties are actively constructing and operating these historic routes during Grays Bay construction and operations, WKR will seek to work with those third parties to share this infrastructure. If no third parties are actively using this infrastructure, WKR will construct and operate this infrastructure itself.*

**Is there any other infrastructure at the Jericho mine that the WKR is considering using for the project?**

*WKR will consider re-using any infrastructure that remains at the Jericho mine, should it be suitable and available on mutually agreeable terms with Crown-Indigenous Relations and Northern Affairs Canada, the current manager of the Jericho site. WKR has not identified any additional infrastructure that meets these criteria at this time.*

We thank you for the opportunity to provide comments and look forward to the ongoing discussion on 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.  
Keith Morrison, Manager, Impact Assessment, Nunavut Impact Review Board  
Kelli Gillard, Senior Impact Assessment Officer, Nunavut Impact Review Board