



CIRNAC Comments to NIRB

Re: Notice of Screening for Atha Energy Corporation's
"Thelon Property" Project Proposal



Nunavut Regional Office
918 Sivumugiaq Street
Iqaluit, NU, X0A 3H0

Your file - Votre référence
24EN052
Our file - Notre référence
GCdocs#132549506

January 31, 2025

Tundra Kuliktana
Screening Officer
Nunavut Impact Review Board
P.O. Box 1360
Cambridge Bay, NU, X0B 0C0
via NIRB public registry

Re: Notice of Screening and Comment Request for Atha Energy Corporation's "Thelon Property" Project Proposal

Dear Tundra Kuliktana,

On January 10, 2025, the Nunavut Impact Review Board (NIRB) invited parties to comment on Atha Energy Corporation's "Thelon Property" project proposal. Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC) has reviewed the project proposal and offers the following responses pertaining to the NIRB's request:

Any matter of importance to the Party related to the project proposal.

CIRNAC 1: Groundwater Impacts and Mitigation Measures

CIRNAC notes that the Proponent did not describe potential impacts from, or proposed mitigation measures associated with, drilling on groundwater in its management plans or application to the NIRB. CIRNAC recommends that the Proponent update applicable management plans to clearly describe potential impacts of drilling on groundwater and proposed mitigation measures, including how it intends to manage any artesian flows that may be encountered during drilling.

CIRNAC 2: Waste Management Plan

The Proponent provided a summary of anticipated non-hazardous and hazardous wastes in Tables 1 and 2, respectively, and Section 3 describes waste classification and disposal plans. CIRNAC notes that some waste classifications in Table 1 are not consistent with those described in Section 3. For example, waste oil, radioactive drill cuttings, and contaminated soils are classified as non-hazardous wastes in Table 1, but are classified as hazardous wastes in Section 3.1. Accurately classifying wastes would provide greater clarity to personnel handling wastes on the site, which could minimize potential impacts resulting from the mismanagement of waste. CIRNAC recommends the Proponent update the Waste Management Plan to reflect the accurate classification of wastes.



CIRNAC 3: Spill Contingency Plan

Section 5.5 describes that chemical spills can be assessed by consulting with Material Safety Data Sheets (MSDS), which are included as a stand-alone document and in Appendix B of the Spill Contingency Plan. CIRNAC notes that there is a substantial amount of information in the MSDS provided, and the manner in which information is currently presented may delay personnel in promptly retrieving information necessary to respond to spills on-site. Improving the findability of information (e.g., table of contents) may improve the rate at which personnel retrieve necessary information and respond to spills on-site, which could minimize environmental impacts associated with spills. CIRNAC recommends that the Proponent improve the findability of information in Appendix B or any on-site collection of MSDS that is expected to be used by personnel in responding to spills.

CIRNAC 4: Consultation with Interest Parties

CIRNAC recommends that the Proponent consult with the Baker Lake Hunters and Trappers Organization, the Kivalliq Wildlife Board, the Hamlet of Baker Lake, and any other relevant organizations and individuals regarding its project proposal. As part of any consultation activities, several issues should be considered, including, but not limited to:

- Incorporation of Inuit Qaujimajatuqangit into project activities;
- Mitigation measures designed to prevent any disturbance to wildlife and the environment;
- The experience of community members who participate in traditional harvesting activities within or in close proximity to the project area;
- Mitigation measures designed to prevent disturbance to sites with cultural, archaeological, and/or environmental significance;
- Training and employment opportunities for Inuit and community members;
- Procurement opportunities for local and Inuit-owned businesses; and
- Regular updates on the status of project activities.

CIRNAC 5: Management Practices Designed to Prevent Disturbances to Wildlife

CIRNAC recommends that the Proponent adhere to applicable regulatory requirements and accepted practices to prevent and/or mitigate any potential disturbances to wildlife that may result from project activities. Meaningful efforts should be made to work with interested stakeholders, including the Kivalliq Inuit Association, Government of Nunavut's Department of Environment, the Baker Lake Hunters and Trappers Organization, and the Kivalliq Wildlife Board, to ensure acceptable management practices are applied. In particular, efforts should be made to develop an acceptable approach for the operation of a helicopter to prevent any negative impacts to caribou and muskoxen from sensory disturbances (visual and sound).

CIRNAC appreciates the opportunity to provide comments. Should you have any questions, please contact John MacInnis or David Abernethy by e-mail at john.macinnis@rcaanc-cirnac.gc.ca or david.abernethy@rcaanc-cirnac.gc.ca.

Sincerely,



Richard Bingley
Manager, Impact Assessment

