



**NIRB File No.: 24EN052**  
NPC File No.: 150551

February 11, 2025

Karina Tyne  
Atha Energy Corporation  
1240-1066 Hastings Street W  
Vancouver, BC, V6E 3X1

Sent via email: [karina@athaenergy.com](mailto:karina@athaenergy.com)

**Re: Opportunity to Address Comments Received Regarding Atha Energy Corporation's "Thelon Property" Project Proposal**

Dear Karina Tyne:

On January 10, 2025, the NIRB circulated a public notice of the screening for this project, inviting interested parties to provide comments directly to the NIRB by January 31, 2025.

On or before January 31, 2025, the NIRB received comments from the following interested parties:

- *Government of Nunavut (GN)*
- *Kivalliq Inuit Association (KIA)*
- *Crown-Indigenous Relations and Northern Affairs (CIRNAC)*
- *Environment and Climate Change Canada (ECCC)*
- *Transport Canada (TC)*
- *Ghotelnene K'odtineh Dene (GKD)*
  - *Sayisi Dene First Nation*
  - *Northlands Denesuline First Nation*
- *Anne Andreassen*
- *Paula Hughson*

All comment submissions received by the NIRB relating to this project proposal can be accessed from the NIRB's online public registry at [www.nirb.ca/project/126012](http://www.nirb.ca/project/126012).

A *summary* of the public concerns from the comment submissions in relation to the "Thelon Property" project proposal:

### **GN:**

- Requested a table summarizing the caribou group-size thresholds and distance buffers that will be used to trigger work stoppages during each of the sensitive seasons that the Project may interact with caribou (i.e., migratory, calving, and post calving seasons).

### **KIA:**

- KIA supports the project proposal, pending KIA Land Use License application review.
- Requested information including:
  - A map showing the route(s) to be used for overland hauling, proposed airborne surveys including caribou crossings and calving grounds;
  - A list of all materials and the amounts of each to be hauled including a list of amounts of dangerous good to be transported. Further, please confirm TDG certification of contractor and proper spill response kits and equipment;
  - A schedule for the proposed airborne surveys that is compliant with the KIA's Mobile Conservation Measures Guidelines;
  - A map(s) showing the location of the proposed diamond drill holes before the end of 2025 calendar year along with drill hole closure and reclamation practices; and
  - the Proponent provide a permission letter from the community of Baker Lake to store these materials and barrels prior to the shipping of these materials to an approved disposal facility.
- KIA stated that the Proponent is required to submit an annual report to KIA on the Project and requested that the Proponent would include a list of topics.

### **CIRNAC:**

CIRNAC recommended the Proponent:

- Update applicable management plans to clearly describe the potential impacts of drilling on groundwater and proposal mitigation measures, including how it intends to manage any artesian flows that may be encountered during drilling;
- Update the Waste Management Plan to reflect the accurate classification of wastes;
- Improve the findability of information in the Spill Contingency Plan;
- Consultation with Interested parties; and
- Management Practices Designed to Prevent Disturbances to Wildlife including maintaining open communication with representatives of the Baker Lake Hunters and Trappers Organization, the Kivalliq Inuit Association, the Kivalliq Wildlife Board, the Hamlet of Baker Lake, and Government of Nunavut's Department of Environment.

### **ECCC:**

ECCC recommends the Proponent to provide additional information regarding:

- Disposal of Radioactive Wastes;
- Secondary Containment – Berms, size, and remote caches;
- Vehicle and Equipment Leaks; and
- Hydrocarbon Clean-up.

## **TC:**

TC has reviewed the project proposal and notes that the project includes water withdrawal from unnamed lakes and the possible transport of hazardous materials (dangerous goods) by helicopter. TC highlights the *Canadian Navigable Waters Act (CNWA)* and the transportation of dangerous goods that are particularly relevant for this project:

- Noted works, such as water intakes for water withdrawals, in navigable waterways are subject to the CNWA. To determine the applicability of the CNWA to the project TC included the instructions and links to the information to be completed by the Proponent as it completes its application with TC.
- Noted that the shipper preparing the dangerous shipment for air transportation via helicopter must have International Civil Aviation Organization (ICAO) training for dangerous good and which training requirements.

## **Ghotelnene K'odtineh Dene:**

GKD stated that the existence, culture, way of life and rights of our people are deeply connected to the caribou and its habitat – any harm to the caribou (Beverly/Qamanirjuaq herd) is a harm to the Dene.

- GKD stated that Altha's Thelon Property Project may result in significant adverse impacts on the ecosystem, wildlife, wildlife habitat, and harvesting activities of GKD and other Indigenous peoples, as well as other potential socio-economic effects on GKD.
- GKD has concerns related to the proposed activities, particularly on the potential impacts to caribou and their habitat and the need for greater assessment of the cumulative impacts to wildlife and wildlife habitat, particularly caribou, from this project proposal.

## **Anne Andreassen:**

- Indicated several concerns regarding the project proposal ranging from environmental and socio-economic topics and does not support the project.
- Stated that the community needs an in-person meeting about this proposal.
- The Thelon River is a Canadian Heritage River and needs to be protected for future generations. The caribou used to migrate across the Thelon, but due to exploration the caribou have not crossed in large numbers since 2009. The Thelon Wildlife Sanctuary is also protected. There should be extensive consultations with a variety of stakeholders.
- Recommended the Proponent to review the following acts, regulations and reports:
  - *Thelon Game Sanctuary Management Plan;*
  - *Department of Sustainable Development Parks and Tourism Division, Thelon Heritage River: Ten-Year Review;*
  - *Government of the Northwest Territories Parks Act; and*
  - *World Wildlife Fund (WWF) Report 2017.*

## **Paula Hughson:**

- Indicated several concerns regarding the project proposal ranging from environmental and socio-economic topics and does not support the project.

- makes observations regarding local consultation and roles of the Proponent and various levels of government.
- Observes that the Critical Mineral Strategy was not discussed with Nunavut or the local level where impacts would be felt the most.
- Discussed education and promises of jobs.
- Expressed concerns with uranium industry and mining project life cycles noting concerns with monitoring of these types of projects.
- Requested moratorium on uranium and a vote for federal crown lands and Inuit owned lands.

The NIRB would like to provide Atha Energy Corporation with an opportunity to address the comments noted above prior to the Board rendering its determination for this screening assessment and issuing its subsequent Screening Decision Report to the responsible Minister(s). The NIRB respectfully requests that a response be provided directly to the NIRB by **February 25, 2025**.

If Atha Energy Corporation determines that the time required to supply a written response is significantly greater than two (2) weeks, the Board requests written notification and an anticipated date for submission be provided as soon as possible.

Please send any forthcoming submissions directly to the NIRB at [info@nirb.ca](mailto:info@nirb.ca), or through the online public registry at [www.nirb.ca](http://www.nirb.ca).

If you have any questions or require additional clarification, please contact the undersigned directly at (867) 983-4612 or [tkuliktana@nirb.ca](mailto:tkuliktana@nirb.ca) or Kelli Gillard, Senior Impact Assessment Officer at (867) 983-4619 or [kgillard@nirb.ca](mailto:kgillard@nirb.ca).

Sincerely,



Tundra Kuliktana  
Screening Officer  
Nunavut Impact Review Board

cc: Distribution List  
Richard Dwyer, Nunavut Water Board  
Carson Gillis, Nunavut Tunngavik Inc.  
Jorgan Aitaok, Nunavut Tunngavik Inc.  
Luis Manzo, Kivalliq Inuit Association  
Ashley Aupaluktuq-Burton, Kivalliq Inuit Association  
Caroline Whittle, Government of Nunavut - Culture and Heritage  
Sylvie LeBlanc, Government of Nunavut - Culture and Heritage  
Drikus Gissing, Government of Nunavut - Department of Environment  
Bradley Pirie, Government of Nunavut - Department of Environment  
Michele LeBlanc-Havard, Government of Nunavut - Department of Environment  
Tracey McCaie, Crown-Indigenous Relations and Northern Affairs Canada  
Marcus Bermann, Crown-Indigenous Relations and Northern Affairs Canada