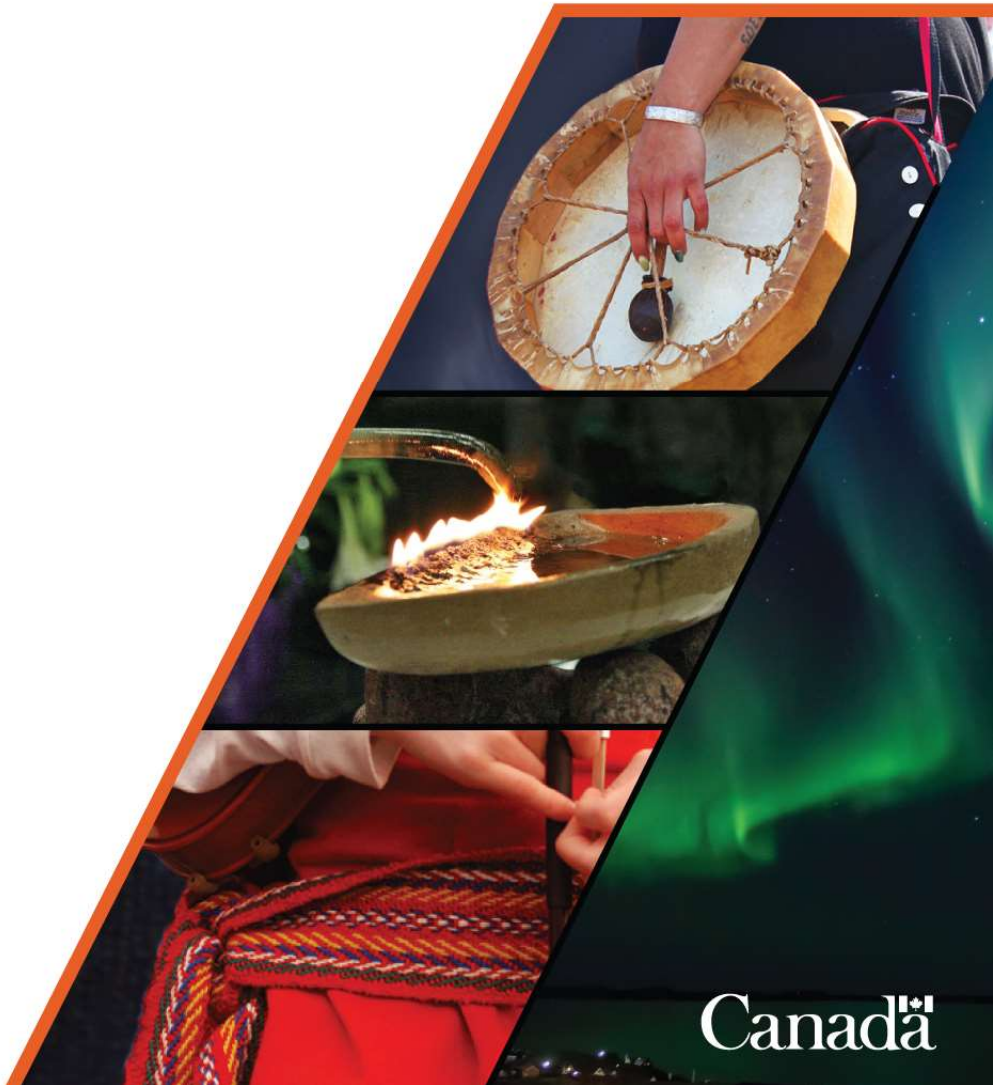




CIRNAC Comments to NIRB

Re: Notice of Screening for 6106 Resources Ltd.'s "Hook Lake Project" Proposal



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

Your file - Votre référence
25EN080
Our file - Notre référence
GCdocs# 142829168

January 27, 2026

Viren Nasit
Senior Impact Assessment 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 6106 Resources Ltd.'s "Hook Lake Project" Proposal

Dear Viren Nasit,

On January 8, 2026, the Nunavut Impact Review Board (NIRB) invited parties to comment on 6106 Resources Ltd.'s "Hook Lake Project" proposal. Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC) appreciates the opportunity to provide comments and offers the responses below as it pertains to the NIRB's request:

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

CIRNAC #1: Fuel Storage Configuration and Site-Specific Spill Risk

The Project will involve the storage and handling of diesel fuel, aviation fuel, gasoline, lubricants, and other hazardous liquids at a temporary exploration camp supporting up to 20 personnel and at multiple drill locations across the Hook Lake Project area during the 2026 summer field season. Project documentation indicates fuel storage volumes may include approximately 200 drums of diesel fuel (41,000 L) and a similar quantity of aviation fuel, in addition to smaller volumes of gasoline, propane, and lubricants. While a Fuel Spill Contingency Plan has been provided, it remains unclear whether site-specific environmental conditions, including proximity to lakes, drainage pathways, terrain gradients, and seasonal ice or thaw conditions, have been incorporated into decisions regarding the placement and configuration of fuel caches and refuelling areas. Also, it is not described how fuel storage locations would be evaluated or modified where local conditions present elevated spill migration risk. CIRNAC recommends that the Proponent considers:

- Applying site selection criteria for fuel storage and refueling areas that minimize the risk of releases to waterbodies, snow, ice, or soils;
- Maintaining appropriate setbacks from surface water features when siting fuel caches, where practicable; and,



- Incorporating site-specific terrain, drainage, and spill pathway considerations into fuel storage layout decisions once final camp and drill locations are confirmed.

CIRNAC #2: Drilling Fluids and Chemical Additives

Diamond drilling activities may require the use of drilling fluids and chemical additives under permafrost conditions. While the Proponent describes general measures for drill fluid management and containment, it remains unclear how site-specific terrain, drainage pathways, and permafrost conditions will be considered when confirming drill fluid containment locations at individual drill sites. Clarifying how these factors will be addressed will help validate the effectiveness of drill fluid containment under variable site conditions. CIRNAC recommends that the Proponent considers documenting how site-specific terrain, drainage pathways, and permafrost conditions are considered when confirming drill fluid containment locations, in addition to maintaining the stated minimum setback from the ordinary high-water mark.

CIRNAC #3: Camp Wastewater and Greywater Management

Operation of the temporary exploration camp will generate greywater and sewage requiring appropriate management. While the Proponent describes general measures for wastewater disposal including the use of sumps and closure at demobilization, it remains unclear how wastewater volumes, sump capacity, and infiltration performance under seasonal thaw conditions have been considered when confirming disposal locations. In addition, the Proponent did not describe how greywater and sewage disposal practices will be managed to prevent the development of preferential surface or subsurface flow paths under variable ground and thaw conditions.

CIRNAC recommends that the Proponent considers documenting how wastewater volumes, sump capacity, infiltration performance, and the potential for preferential surface or subsurface flow paths are considered when confirming camp wastewater and greywater disposal locations and management practices.

CIRNAC #4: Consultation With Interested Parties

CIRNAC recommends that the Proponent continue its efforts to engage with potentially interested parties regarding its project proposal. These parties include the Hamlet of Arviat, the Arviat Hunters & Trappers Organization, the Kivalliq Inuit Association, the Ghotelnene K'odtjneh Dene, and any other relevant organizations or individuals.

As part of these consultation activities, several issues should be considered, including but not limited to:

- Incorporation of Inuit Qauijimajatuqangit, Indigenous knowledge, and Community Knowledge, in addition to scientific ways of knowing into project activities;
- Mitigation measures to prevent any disturbance to wildlife and the environment;
- Mitigation measures to prevent disturbance to sites of cultural, archaeological, and/or environmental significance;
- The experience of community members who participate in traditional harvesting activities within or in close proximity to the project area;
- 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: Project Materials for Ghotelnene K'odtjneh Dene

The Ghotelnene K'odtjneh Dene are Indigenous peoples who have traditionally used and occupied their ancestral lands, including areas within what is now the territory of Nunavut, since time immemorial. They continue to maintain a presence and connection to these lands today. Based on the information available, the proposed project appears to be of possible interest to the Ghotelnene K'odtjneh Dene.

CIRNAC recommends that, if not already undertaken, the Proponent ensure that they consult with the Ghotelnene K'odtjneh Dene.

CIRNAC appreciates the opportunity to provide comments. Should you have any questions, please contact Muhammad Arslan by e-mail at muhammad.arslan@rcaanc-cirnac.gc.ca or David Abernethy by email at david.abernethy@rcaanc-cirnac.gc.ca.

Sincerely,



Richard Bingley
Manager, Impact Assessment

