

February 11, 2026

Viren Nasit

Senior Impact Assessment Officer

Nunavut Impact Review Board

P.O. Box 1360

Cambridge Bay, NU X0B 0C0

Dear Viren:

**Re: NIRB File No. 25EN080 – 6106 Resources Ltd. Hook Lake Project**

6106 Resources Ltd. (“6106” or the “Company”) appreciates the time and consideration given by all reviewers to the Hook Lake Project screening application. The Company provides the following responses in the order comments were received.

**Transport Canada**

6106 Resources Ltd. thanks Transport Canada for confirming that none of the Project components fall within its mandate and that no concerns were identified.

**Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC)**

**Fuel Storage Configuration and Site-Specific Spill Risk**

6106 confirms that site-specific environmental conditions will be incorporated into decisions regarding the placement and configuration of fuel caches and refueling areas. Fuel storage locations will consider terrain, drainage pathways, proximity to waterbodies, and seasonal ground conditions. Appropriate setbacks from surface water features will be maintained where practicable. Site-specific spill pathway considerations will be incorporated once final camp and drill locations are confirmed. The Company would like to add that the camp location may be moved based on feedback from the HTO, and subject to a pre-program site assessment.

**Drilling Fluids and Chemical Additives**

The Company will document how site-specific terrain, drainage pathways, and permafrost conditions are considered when confirming drill fluid containment locations. Minimum setbacks from the ordinary high-water mark will be maintained.

#### Camp Wastewater and Greywater Management

6106 will document how wastewater volumes, sump capacity, infiltration performance, seasonal thaw conditions, and potential preferential flow paths are considered when confirming disposal locations and management practices.

#### Consultation With Interested Parties

6106 undertook engagement with the Arviat Hunters and Trappers Organization (AHTO) and the Hamlet of Arviat. An in-person meeting was planned; however, due to severe weather conditions in the community, engagement proceeded via radio. This format still allowed community members to raise concerns and ask questions, which were addressed by the Company.

Engagement will continue over the life of the Project, and local hiring and business opportunities will be offered where available.

#### Project Materials for Ghotelnene K'odtjneh Dene

6106 has reached out to the Ghotelnene K'odtjneh Dene and remains open to continued dialogue.

### **Government of Nunavut**

#### GN #1 – Wildlife Monitoring and Mitigation Plan (Caribou)

6106 commits to updating the Wildlife Monitoring and Mitigation Plan to clarify:

- The observation-based approach used to trigger mitigation actions;
- Criteria used to identify potential calving behaviour;
- How wildlife monitoring will occur and by whom;
- Seasonal timing references used to define pre-calving and calving periods; and
- The spatial scope of mitigation measures, which apply to the active work area and operational vicinity.

Caribou mitigation will follow a stepwise and adaptive approach. Where caribou are observed within the operational vicinity, mitigation actions may include modifying flight paths, increasing separation distances, reducing activity levels, temporarily pausing non-essential activities, or relocating work areas where practicable.

### GN #2 – Raptors

The Wildlife Monitoring and Mitigation Plan will be updated to clarify how known or potential raptor nest locations will be identified, including reference to existing GN data sources and field observations. If additional site-specific surveys are warranted, they will be incorporated into planning.

### GN #3 – Bear Safety

The Wildlife Plan will be updated in accordance with GN's "Bear Safety: Reducing Bear-People Conflicts in Nunavut" guidance to ensure appropriate procedures are in place.

### GN #4 – KIA Mobile Protection Measures

6106 acknowledges that the Kivalliq Inuit Association (KIA) Mobile Caribou Protection Measures were not appended to the Wildlife Plan. The Company will update the Plan to clarify how these measures are implemented in practice and will append a summary consistent with KIA guidance.

Implementation will include proactive routing, designated wildlife observation responsibilities, avoidance of direct overflight, and adaptive modification of activities where caribou are present in the operational vicinity.

### GN #5 and #6 – Fuel Spill Contingency Plan

The Company commits to revising the Fuel Spill Contingency Plan to clarify:

- Storage and secondary containment of fuel-related products;
- Use and location of spill kits at camp and drill sites;
- Explicit steps regarding containment, sealing, and disposal of contaminated materials; and
- Use of absorbent materials to prevent spill expansion.

### GN #7 – GN Contact Information

The Wildlife Plan will be updated with the corrected GN contact information.

### GN #8 – Archaeological and Paleontological Protection

6106 acknowledges the importance of protecting archaeological and paleontological resources in Nunavut and commits to the following:

- The Company will avoid any known or suspected archaeological and/or paleontological sites.
- The Company shall not remove, disturb, or displace any archaeological artifact or site, or any paleontological site or fossil.
- The Company shall ensure that all persons working under the authority of the permit are aware of these conditions pertaining to archaeological sites and artifacts, as well as paleontological sites and fossils.
- The Company shall cease activity should any archaeological, paleontological, or burial site be discovered during the course of land use operations and will report such findings to the appropriate authorities.

The Company has commenced an initial desktop review to identify areas with elevated archaeological potential based on landscape characteristics. Where ground disturbance is planned, and once snow-free conditions allow adequate surface visibility, the Company will coordinate archaeological field surveys as required and prior to disturbance in those specific areas.

Where Project components are modified or relocated between field seasons, archaeological assessment will be completed prior to disturbance in newly affected areas, as necessary.

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

6106 thanks the Ghotelnene K'odtineh Dene for their comments. The Company acknowledges the importance of caribou to their culture and harvesting activities. The Project is a temporary, low-footprint mineral exploration program. Through implementation of the Wildlife Monitoring and Mitigation Plan, including adaptive application of KIA's Mobile Caribou Protection Measures and engagement of local wildlife monitors through AHTO, the Company intends to minimize disturbance to wildlife and harvesting activities.

The Company remains committed to ongoing dialogue with the Ghotelnene K'odtineh Dene and will continue to provide information regarding Project planning and seasonal activities as they progress.

### **Beverly and Qamanirjuaq Caribou Management Board (BQCMB)**

6106 acknowledges the sensitivity of the Beverly/Qamanirjuaq herd during calving and post-calving periods.

Enhanced monitoring and mitigation will be applied during sensitive seasonal periods. Where calving is confirmed within the operational vicinity, activities will be modified or relocated where practicable.

The Company intends to engage wildlife monitors through the Arviat Hunters and Trappers Organization to provide local knowledge and support implementation of mitigation measures. Wildlife monitors will provide advice to the Field Supervisor regarding caribou presence and behaviour. Final operational decisions remain the responsibility of the Company's Field Supervisor, who has authority to adjust, pause, or relocate activities as appropriate.

6106 will also work with Arviat HTO to identify locally important movement corridors or crossings to inform planning and routing decisions. In addition, the Company will reach out to and work with the HTO on an appropriate camp site to minimize wildlife disturbance.

### **Athabasca Denesųtiné NéNé Land Corporation**

6106 Resources Ltd. thanks the Athabasca Denesųtiné NéNé Land Corporation (ADNLC) for its thoughtful comments and recommendations.

### **Disturbance to caribou during spring migration, calving and post-calving**

The Company recognizes the sensitivity of these periods. Planning has incorporated the NPC calving grounds mapping and available collar data. Efforts have been made to obtain updated collar data from the GN; in the absence of this, the Company has relied on information shared by the BQCMB. Access to current collar data would assist in refining avoidance measures and would be appreciated.

### **Protection of migration routes and freshwater crossings**

The Company intends to engage knowledgeable local land users, including through the HTO, to assist in identifying important crossings and migration routes and to support practical avoidance and mitigation measures.

### **Avoidance of critical habitat**

Consistent with the KIA Mobile Caribou Conservation Measures, activities will be adjusted where caribou are observed in the immediate vicinity. Aircraft operations will follow applicable height and setback guidance over occupied calving and post-calving areas,

subject to pilot discretion and safety considerations. Seasonal operating practices will be adapted as required.

#### Monitoring and reporting

The Company will implement the KIA Mobile Caribou Conservation Measures on both Inuit Owned and Crown Lands and will work with local knowledge holders to monitor effectiveness and adapt mitigation measures where necessary.

#### Potential long-term disturbance

Where feasible, the Company proposes to use existing winter access routes and limit infrastructure to a small, seasonal temporary camp to minimize surface disturbance.

#### Engagement

6106 Resources Ltd. apologizes for not engaging the Athabasca Denesųliné earlier and will ensure they are included in future engagement activities.

#### **Hamlet of Arviat**

6106 Resources Ltd. has received a letter of support from the Hamlet of Arviat, which is attached separately to this submission.

6106 appreciates the constructive input received and remains committed to conducting exploration activities in a responsible and adaptive manner.

Sincerely,



Eric Sondergaard

6106 Resources Ltd.

Attachment: KIA Caribou Conservation Measures  
Hamlet of Arviat letter of Support