



We know the North. We know logistics. We come with the territory.

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January 16, 2026

Richard Bingley
Manager, Impact Assessment
918 Sivumugiaq Street
Iqaluit, NU X0A 3H0

Dear Mr Bingley,

This letter is in response to the January 14, 2026 comments with respect to the **Notice of Screening for Peter's Expediting Ltd's "Aberdeen Lake-Pelly Lake Overland Haul" project proposal (25RN083)** provided to Mia Beattie, Impact Assessment Officer, Nunavut Impact Review Board (NIRB). Thank you for your time and care in responding to our proposal.

Concern #1: Fuel and Hazardous Material Handling

Reference PEL Response to CIRNAC – Pelly Lake Overland Haul 2025

*How refueling will take place enroute – ***refueling only be performed on land****

Standard operating procedures in PEL's 27-year overland haul experience include only refueling equipment on land, away from any body of water or stream. Our vehicles are equipped with GPS devices that display any lakes or streams. Should there be any streams in the immediate area, vehicles will move to find a location away from said stream. If a spill should occur, it will be strictly on land and away from any running water. All fuel is stored in secondary containment designed tanks, properly labeled as per Transport Canada regulations. Spill response materials will be located in each vehicle and our Caboose. All staff are trained in-house and briefed in proper refuelling and spill response measures.

Please refer to project-specific Spill Response Policy in Appendix A

Concern #2: Legacy Contamination and Secondary Release Risk

Loads on PEL sleighs are secured using herc-straps and load binders.

Spare soil bags and buckets will be on hand within PEL equipment should any contaminated soil be released.

Material Packing and movement:

All solid and liquid hazardous wastes were removed from the site by air in the summer. The only contaminated waste being transported over the winter trail back to Baker Laker is contaminated sediment and soil. Containers for transport were selected for durability and are compliant with Federal Transportation of Dangerous Good Regulations for land and marine movement for these specific materials and chemical contaminants. Additional specific container details are provided below.

Contaminated Sediment and Soil was excavated and direct loaded into heavy duty double lined mega bags with sealable tops. Bags were underfilled to ensure that the 1,500 kg capacity was not exceeded and to further mitigate potential tears and spills during movement or hauling. The bags will be strapped onto pallets prior to loading onto the CAT train. Bags and pallets will be secured to the sleds with straps and or chains. There are a total of 8 bags of soil/sediment to haul out of the site on the winter trail. Additional bags will be present on the train carrying the bags in case of a tear or spill so that loose contents can be collected up and re-contained in appropriate regulated containers for transport. A description of the mega bags that are used in provided below.

Type	Certification	Capacity	Picture	Description	Application
Mega Bags	UN13H4/X/CA N/4- 521/2450/136 1	Varies, approx. 1m3 to 1.5m3, (~1500kg)		FIBCs (flexible intermediate bulk containers) are made of flexible material and equipped with an interior liner. Suitable for storing dry bulk materials.	Contaminated soil and Sediments

Glass Debris from one area of the site was consolidated into one HDPE plastic drum with a sealable lid. This will be strapped to a pallet prior to loading onto the CAT trail. The drum and pallet will be secured to the sleds with ratchet straps and or chains for hauling back to Baker Lake. A detail of the plastic drum specifications is provided below.

Type	Certification	Capacity	Picture	Description	Application
Plastic Drums	UN 1H2/Y 1.2/100	205 L		Sealed polymer drums for consolidation and transport of liquids.	Air Transport, Contaminated water and oils.

Scrap steel and other non-hazardous waste were cut to manageable size and consolidated in to cleaned “half tank” containers. Tank containers will be covered and secured with heavy duty tarps. Then containers will be blocked and chained to the CAT train sleds for hauling back to Baker Lake.



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Loads will be continuously monitored in transit for shifting and damage. The trains will stop immediately if adjustments or re-strapping are required. Spills will be managed as detailed in the Spill response plan. Jetsam will be collected.

Concern #3: Terrain and Permafrost Disturbance Under Variable Snow Conditions

PEL is highly experienced in the development of winter trails and aware of this concern. Prior to official overland haul season commencement, trail conditions are inspected during the pre-season trail scouting trip by snowmobile. This trip determines thickness and stability of snow and ice to avoid damage caused by equipment to flora/fauna. If the ground conditions are not acceptable, the trip will be postponed. Ideal ice thickness is at least 4 feet (48 inches) and ideal snow thickness is 1.5 feet (18 inches). Our equipment will not operate on thawed and exposed terrain or vegetation. All necessary measures will be taken to avoid disruption to vegetation. Historically, operations have halted due to insufficient snow cover.

Concern #4: Consultation with interested parties

Peter's Expediting Ltd. has been doing overland haul work since inception in 1998. The regional community has full knowledge of our 27-year experience in this type of operation. No direct consultation was completed in 2025, other than keeping KIA staff informed and interviewing local Baker Lake Elder John Avaala on the local wildlife, history and terrain navigation needs of the area being travelled on. Aside from community consultations, our management and staff have conversations with local hunters who exchange traditional guidance and knowledge on the land and animals.

PEL wishes to expedite this process to demonstrate to our clients that we can complete this project on schedule.

Please feel free to contact me with further questions – frank@petersexpediting.com and phone 867-793-2703.

Ma'na,

Savigata Tootoo
General Manager
Peter's Expediting Ltd.
Baker Lake, NU