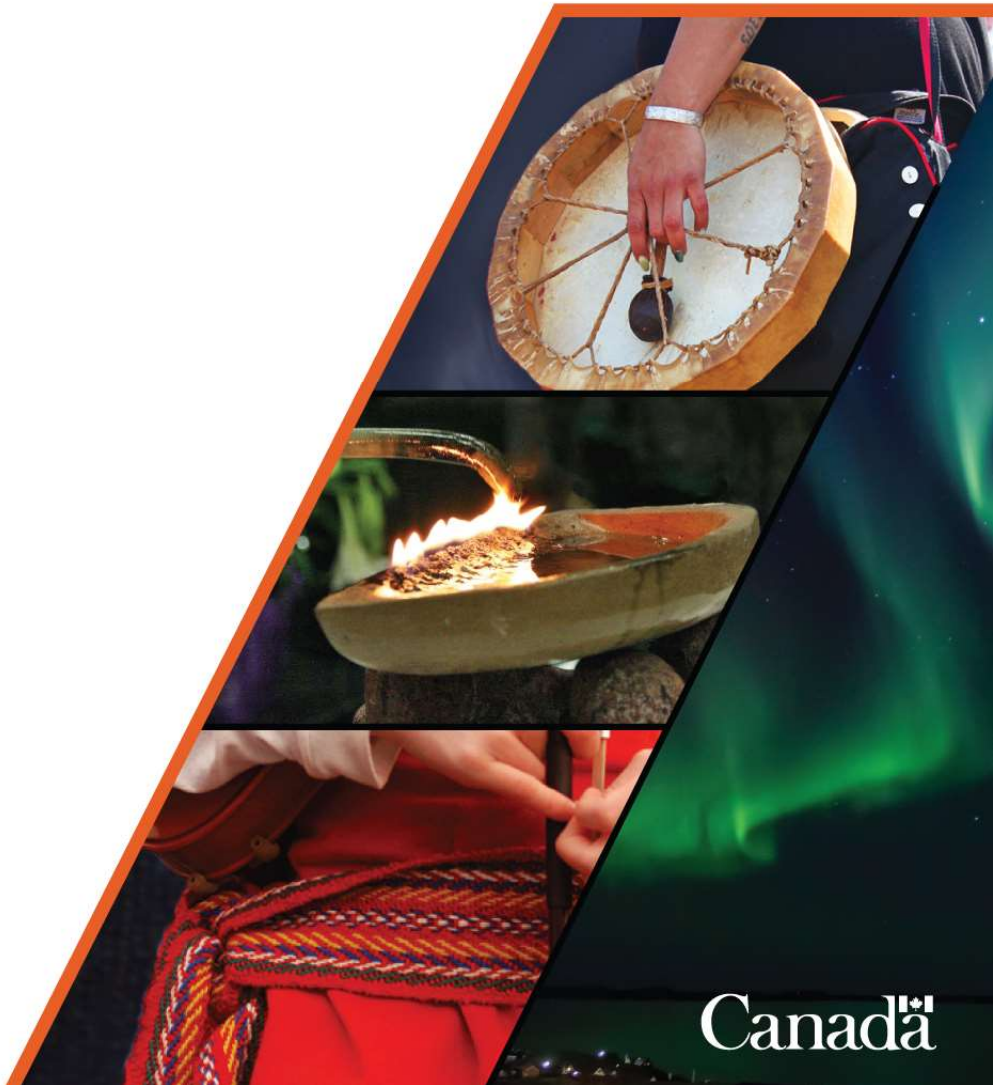




CIRNAC Comments to NIRB

Re: Notice of Screening for 1517081 B.C. LTD "Victory Lake" Project Proposal



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

Your file - Votre référence
26EN006
Our file - Notre référence
GCdocs# 144755459

March 30, 2026

Francis Emingak
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 1517081 B.C. LTD "Victory Lake" Project Proposal

Dear Francis Emingak,

On March 10, 2026, the Nunavut Impact Review Board (NIRB) invited parties to comment on 1517081 B.C. LTD "Victory 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 and Hazardous Material Storage and Spill Risk

The Project materials present inconsistent fuel inventories and storage configurations. The Application indicates up to 200 drums (205 L) per fuel type (~41,000 L each), whereas the Spill & Fuel Management Plan limits on-site storage to 100 drums (~20,500 L per fuel type), with distributed caches of approximately 10,000-20,000 L and total cache volumes < 80,000 L. This discrepancy introduces uncertainty in the maximum spill scenario used for planning containment and response. While distributed caches reduce single-point failure risk, they increase the number of transfer events and handling interfaces. Given proximity to lakes and the use of overland transport on snow/ice, spill pathways may include rapid lateral transport during thaw periods, increasing the likelihood of hydrocarbon migration to surface water and shallow soils. CIRNAC recommends that the Proponent considers:

- Reconciling fuel inventories across all filings to clearly define the maximum concurrent on-site volumes and associated worst-case spill scenario;
- Providing a high-level fuel logistics and transfer schedule to contextualize handling frequency; and
- Confirming secondary-containment specifications (e.g., berms/portable systems) that demonstrate adequacy under extreme precipitation/snowmelt.



CIRNAC #2: Drill Cuttings and Artesian Groundwater Management

The Waste Management Plan indicates that up to ~50 m³/day of water may be used for drilling, with fluids recycled where practicable, and that drill cuttings and fluids will be disposed in hand-dug or natural sumps located ≥31 m from waterbodies. While this approach is consistent with standard exploration practices, the disposal of cuttings and fluids into unlined sumps in potentially thawed or permeable active-layer soils presents a pathway for downward and lateral migration of dissolved constituents. The use of “standard non-toxic drill fluids such as salt” introduces ionic loading (e.g., chlorides), which can depress the freezing point of porewater and alter soil thermal regimes, potentially affecting permafrost stability and vegetation recovery. Furthermore, the application materials do not describe contingency measures in the event that artesian groundwater is encountered. Uncontrolled artesian flow could mobilize fine sediments and dissolved constituents, create preferential flow pathways, and result in persistent discharge to surface environments if not properly sealed. CIRNAC recommends that the Proponent considers:

- Confirming if only inert drilling fluids would be deposited to sumps/natural depressions and that backfilling occurs after contents have frozen with grading to avoid ponding; and
- Describing procedures for managing artesian groundwater, including immediate control measures and final drillhole abandonment practices to ensure long-term hydraulic isolation.

CIRNAC #3: Soil Disturbance and Reclamation

The Closure and Reclamation Plan proposes temporary timber platforms with coco-matting, hand levelling/re-contouring after drilling, progressive reclamation, and post-move debris checks, which indicates intent to restore sites and protect permafrost (including avoiding ponding at collars and backfilling temporary depressions). However, the application materials do not describe salvaging and replacing vegetation mats/topsoil, loosening compacted soils, or whether any post-drilling surface stabilization would be applied where needed. CIRNAC recommends that the Proponent considers salvaging/replacing vegetation mats/organics for use in reclamation to support natural revegetation.

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 Issatik Hunters and Trappers Organization (Whale Cove), the Kangiqtiniq Hunters and Trappers Organization (Rankin Inlet), the Baker Lake Hunters and Trappers Organization, the Hamlets of Whale Cove, Rankin Inlet, and Baker Lake, the Kivalliq Inuit Association, 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 Qaujimajatuqangit and local knowledge in 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 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

