

Northern Division
Environmental Protection Operations Division
Prairie and Northern Region
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Sept. 2, 2008

Our File:

Nunavut Water Board
P.O. Box 119,
Gjoa Haven, NT X0B 1J0

Attention: Richard Dwyer

By email

Re: Agnico-Eagle Mines Ltd. Submission of Plans: 1). Waste Rock and Water Management Plan and 2). Monitoring Plan (Water Licence 8BC-TEH0809) and 3). Water Quality Monitoring and Management Plan for Dike Construction and Dewatering at the Meadowbank Mine (Water Licence 2AM-MEA0815)

On behalf of Environment Canada (EC) I have reviewed the above plans and offer the following comments for your consideration. In general the plans are concisely written, provide clear descriptions of operational steps and plans, and are generally consistent with the Type A and B water licences.

1). Waste Rock and Water Management Plan:

The plan notes the use of incineration for the disposal of sludge; this should be corrected to state that sludge will be going to the Tailings Storage Facility once it is commissioned (as per Part D.20 of the Type A licence).

2). Monitoring Plan:

Section 3.2.1 outlines the actions to be taken if water quality analytes in the quarry or stream crossing sampling exceed CCME criteria or background values. The statement "Where water quality exceeds CCME criteria or background values the following actions will be initiated..." should be qualified that whichever is the highest as a standard will be used, as there is no point in triggering actions if CCME criteria are exceeded in an area with higher (natural) background concentrations of a given parameter.

3). Water Quality Monitoring and Management Plan for Dike Construction and Dewatering:

This plan is an important one, given the potential for in-lake effects associated with dike construction and/or dewatering. The contents of the plan reflect the discussions which took place at the water licencing sessions, as well as the requirements of the water licence.

None-the-less, during construction of the East Dike, mitigative measures planned for and used in the dike construction were not sufficient to prevent significant sedimentation from occurring outside the silt barriers. EC requests that a "lessons learned" review be done following this construction season, and the plan revised to incorporate more effective mitigation to ensure this does not re-occur. This may include consideration of removal of lake bottom sediments rather

than dumping dyke materials on areas of fine materials, identifying options for improved silt barriers, using cleaner rock fill, or changes to rock amounts placed/placement methods to minimize bottom disturbance. Further assessment of substrates may be needed in advance of construction.

Agnico-Eagle's Water Quality and Flow Monitoring Plan specifies two stages of trigger levels for action in the event of a change in analyte concentrations. The first stage is when 50% of a threshold criteria value (such as the licence limit or MMER limits) is reached, and the second stage is when a criteria is exceeded. This type of approach should be incorporated into the dike construction and dewatering plan to ensure trends are recognised as early as possible, and actions initiated.

EC also recommends that the plan be updated in advance of construction of the remaining dikes, and that it include maps of the construction areas and associated monitoring stations. In addition, benthic monitoring will be required (as per Section 5 Item 9 of the plan) and details of this program should be included in the updated plan.

Please do not hesitate to contact me at (867) 669-4735 or by email at anne.wilson@ec.gc.ca with any questions or comments regarding the foregoing.

Yours truly,

Anne Wilson
Water Pollution Specialist

cc: Carey Ogilvie (Head, EA-North, EPOD)
Chad Harden (Enforcement Officer, EC)
Amy Lui (DFO)