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Information Requests for the Hope Bay Phase Project Type A Water Licence Application Amendment for Operational Update

KIA-IR-01

IR Number	KIA-IR-01
Subject/Topic	Missing figure labels
Importance	Low
References	Hope Bay Operational Update – 2AM-DOH1335 Amendment Main Application Document: <ul style="list-style-type: none"> • Section 1.2, Pages 7-10, Figures 1.2-1 to 1.2-4
Summary	The map figures lack figure number labels.
Detailed Review Comment	
Information Request	The KIA requests: <ul style="list-style-type: none"> • Figure labels be added to the map figures

KIA-IR-02

IR Number	KIA-IR-02
Subject/Topic	Mislabeled table number
Importance	Low
References	Hope Bay Operational Update – 2AM-DOH1335 Amendment Main Application Document: <ul style="list-style-type: none"> • Section 2.2, Page 15, Table 2.2-2
Summary	The table is labeled Table 2.2-2, however there is no Table 2.2-1 in Section 2.2.
Detailed Review Comment	
Information Request	The KIA requests: <ul style="list-style-type: none"> • Relabel the table to Table 2.2-1



KIA-IR-03

IR Number	KIA-IR-03
Subject/Topic	PDA area is not included in Section 1.2
Importance	Low
References	Hope Bay Operational Update – 2AM-DOH1335 Amendment Main Application Document: <ul style="list-style-type: none"> Section 2.2, Page 15, Table 2.2-2
Summary	Table 2.2-2 says “The Operational Update PDA represents a 4.6% increase in the total PDA area (229 ha) (see Section 1.2).”. Section 1.2 does not describe the area of the PDA or the percent increase. There is also no map or figure included to show the PDA.
Detailed Review Comment	
Information Request	The KIA requests: <ul style="list-style-type: none"> The description of the PDA in section 1.2 be expanded to include the former PDA area and the % increase in the total PDA area due to the proposed project changes. Please add a figure showing the former and updated PDA or include a cross reference to an existing figure that shows the PDA.

KIA-IR-04

IR Number	KIA-IR-04
Subject/Topic	Outdated plan version numbers
Importance	Low
References	Hope Bay Operational Update – 2AM-DOH1335 Amendment Main Application Document: <ul style="list-style-type: none"> Section 6, Page 34, Table 6.1-1
Summary	Table 6.1-1 lists all monitoring, mitigation, and management plans and their current plan versions, however more recent versions of these documents are available.



Detailed Review Comment	
Information Request	<p>The KIA requests:</p> <ul style="list-style-type: none"> An update table 6.1-1 to the correct version numbers and dates

KIA-IR-05

IR Number	KIA-IR-05
Subject/Topic	Missing Figure
Importance	Low
References	<p>Appendix 1-A: Evaluation of Change Associated with Operational Update</p> <ul style="list-style-type: none"> Pages 1-A-1-4
Summary	It is unclear which document the referenced Figure 2.1-1 is sourced from or if it is missing from the Main Application Document.
Detailed Review Comment	
Information Request	<p>The KIA requests the following:</p> <ul style="list-style-type: none"> Please cite the plan within which the cited Figure 2.1-1 is to be found, to or add it to the Main Application Document.

KIA-IR-06

IR Number	KIA-IR-06
Subject/Topic	Document Request
Importance	Medium
References	<p>Appendix 4-C: Analysis of Increased Water Withdrawals at Hope Bay</p> <ul style="list-style-type: none"> Section 2.1.2, Page 6
Summary	The document Doris Lake, Doris Creek, and Little Roberts Outflow Fisheries Assessment – Hydraulic Modelling Results



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	(ERM 2015), but it is unclear if this document has been provided for review.
Detailed Review Comment	
Information Request	<p>The KIA requests the following:</p> <ul style="list-style-type: none"> • Please provide a copy of the Doris Lake, Doris Creek, and Little Roberts Outflow Fisheries Assessment – Hydraulic Modelling Results (ERM 2015) or a link to the document to make this easier for reviewers to find and consider.

KIA-IR-07

IR Number	KIA-IR-07
Subject/Topic	Document Request
Importance	Medium
References	<p>Appendix 4-A: Aquatic Effects Monitoring Plan</p> <ul style="list-style-type: none"> • Section 1.2. Page 4
Summary	<p>Several plans and standards designed to manage sources of potential compounds to the freshwater environment were submitted as part of the Madrid-Boston FEIS (TMAC 2017) and the Doris Mine amendment (TMAC 2015), it is unclear if these documents have been submitted for review. As well, there is uncertainty as to the list of plans and standards with the statement “among others”.</p>
Detailed Review Comment	
Information Request	<p>The KIA requests the following:</p> <ul style="list-style-type: none"> • Please provide the Doris- and Madrid Water Management Plan, the Boston Water Management Plan, and the Air Quality Management Plan or a link to these plans to make them easier for reviewers to find and consider. • Please clarify what additional plans and standards were submitted alongside the three documents listed above.



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KIA-IR-08

IR Number	KIA-IR-08
Subject/Topic	Unclear Source
Importance	Low
References	Appendix 4-A: Aquatic Effects Monitoring Plan <ul style="list-style-type: none"> • Section 3.1.1. Page 12 • Section 3.2.2 Page 22
Summary	Appendices V5-4E and V5-4B are referenced. It is unclear if these appendices are part of the “TMAC. 2017. Madrid-Boston Project Final Environmental Impact Statement. TMAC Resources Inc.: Toronto, ON.” referenced report or are sourced from another document.
Detailed Review Comment	
Information Request	The KIA requests the following: <ul style="list-style-type: none"> • Please clarify the source document for the referenced appendices and provide the document or a link to the document to make it easier for reviewer to find and consider if required.

KIA-IR-09

IR Number	KIA-IR-09
Subject/Topic	Management Plans, Environmental Policy, and Field Guide
Importance	Medium
References	Appendix 6-C: Emergency Response and Crisis Management Plan <ul style="list-style-type: none"> • Section 1.4, Page 9 • Section 4.9, Pages 21-22 • Section 7.7, Page 32 • Section 7.15, Page 36 • Section 9, Page 41
Summary	Several management plans and environmental policy plans are referenced, but it is unclear if these plans have been provided for review.



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Detailed Review Comment	
Information Request	<p>The KIA requests the following:</p> <ul style="list-style-type: none"> • please provide the following documents or provide a link to where they are located on the NWB website to make it easier for reviewers to find and consider: Agnico Eagles’ Environmental Policy and Field Guide, Oil Pollution Prevention Plan/Oil Pollution Emergency Plan, Dam Emergency Plan, and the Wildlife Mitigation and Management Plan.

KIA-IR-10

IR Number	KIA-IR-10
Subject/Topic	Document Request
Importance	Medium
References	<p>Appendix 6-E: Groundwater Management Plan</p> <ul style="list-style-type: none"> • Section 1.3. Page 7
Summary	A management plan is referenced, but it is unclear if this plan has been provided for review.
Detailed Review Comment	
Information Request	<p>The KIA requests the following:</p> <ul style="list-style-type: none"> • Please provide the document or link to the document for the Doris and Madrid Water Management Plan to make it easier for reviewers to find and consider.

KIA-IR-11

IR Number	KIA-IR-11
Subject/Topic	Document Request
Importance	Medium
References	<p>Appendix 6-F: Hazardous Waste Management Plan</p> <ul style="list-style-type: none"> • Section 1.3, Page 3



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Summary	Several management plans are referenced, but it is unclear if these plans have been provided for review.
Detailed Review Comment	
Information Request	<p>The KIA requests the following:</p> <ul style="list-style-type: none"> • Please provide the following documents or links to documents to make it easier for reviewers to find and consider them: the Air Quality Management Plan and the Aircraft De-icing Management Plan.

KIA-IR-12

IR Number	KIA-IR-12
Subject/Topic	Management Plans, Environmental Policy, and Field Guide
Importance	Medium
References	<p>Appendix 6-H: Incinerator and Composter Waste Management Plan</p> <ul style="list-style-type: none"> • Section 1.3, Page 5, Table 1.2
Summary	Several management plans and documents are referenced, but it is unclear if these plans have been provided for review.
Detailed Review Comment	
Information Request	<p>The KIA requests the following:</p> <ul style="list-style-type: none"> • Please provide the following documents or links to documents to make it easier for reviewers to find and consider them: Air Quality Management Plan, Kitchen Food and Waste Handling Storage document, and the Incinerator Ash Sampling document.

KIA-IR-13

IR Number	KIA-IR-13
Subject/Topic	Prevention of Wildlife Attraction
Importance	Low



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References	Appendix 6-K: Quality Assurance/ Quality Control <ul style="list-style-type: none"> Section 1.3, Pages 7-8, Table 1-2
Summary	Several management plans are referenced, but it is unclear if these plans have been provided for review.
Detailed Review Comment	
Information Request	The KIA requests the following: <ul style="list-style-type: none"> Please provide the following documents or links to documents to make it easier for reviewers to find and consider them : the Doris-Madrid Water Management Plan, the Boston Water Management Plant, and the Boston Tailings Management Area – Operations, Maintenance Surveillance Manual.

KIA-IR-16

IR Number	KIA-IR-16
Subject/Topic	Document Request
Importance	Medium
References	Appendix 6-K: Quality Assurance/ Quality Control <ul style="list-style-type: none"> Section 1.3, Pages 7-8, Table 1-2
Summary	Several management plans are referenced, but it is unclear if these plans have been provided for review.
Detailed Review Comment	
Information Request	The KIA requests the following: <ul style="list-style-type: none"> Please provide the following documents or links to documents to make it easier for reviewers to find and consider them : the Doris-Madrid Water Management Plan, the Boston Water Management Plant, and the Boston Tailings Management Area – Operations, Maintenance Surveillance Manual.

KIA-IR-17

IR Number	KIA-IR-17
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Subject/Topic	Mislabeled figure numbers
Importance	Low
References	Appendix 6-M: Spill Contingency Plan <ul style="list-style-type: none"> Section 6, Pages 4-6, Figures 0-1 to 0-3
Summary	Figures are labeled 0-1 to 0-3 but referred to as Figures 1-1 to 1-3 in the text.
Detailed Review Comment	
Information Request	The KIA requests the following: <ul style="list-style-type: none"> Update either the figure labels or in-text cross references so they match

KIA-IR-18

IR Number	KIA-IR-18
Subject/Topic	Missing Conformity Item
Importance	High
References	Appendix 6-M: Spill Contingency Plan <ul style="list-style-type: none"> Module A: Doris, page A-1, Part H, Item 10 Module C: Madrid, page C-2, Part I, Item 10 Module C: Madrid, page C-3, Part H, Item 5 Module D: Boston, page D-1, Part H, Item 5
Summary	<p>These tables state: “The Licensee shall, in addition to Part H, Item 9, regardless of the quantity of releases of harmful substances, report to the NWT/NU Spill Line if the release is near or into a Water body.”</p> <p>The specified report section to show conformity is Section 3.3, but this section does not mention that the spill needs to be reported when near or into a waterbody regardless of the quantity of releases. This is also missing from the Immediately Reportable Spills section at the beginning of the document.</p>
Detailed Review Comment	
Information Request	The KIA requests the following:



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	<ul style="list-style-type: none"> Update both Section 3.3 and the Immediately Reportable Spills section to specify releases of any quantity of harmful substances near or into a waterbody are reported to the NWT/NU Spill Line
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KIA-IR-19

IR Number	KIA-IR-19
Subject/Topic	Missing Conformity Item
Importance	High
References	Appendix 6-M: Spill Contingency Plan <ul style="list-style-type: none"> Module A: Doris, page A-1, Part I, item 11 Module C: Madrid, page C-2, Part I, item 11
Summary	<p>These tables state:</p> <p><i>“The Licensee shall submit to the Board for review, at least sixty (60) days prior to operation of the Roberts Bay Discharge System, an addendum to the Spill Contingency Plan detailing spill prevention measures along the pipeline.”</i></p> <p>The specified report section to show conformity is A4, however there is no text in section A4 that describes the spill prevention measures along the pipeline.</p>
Detailed Review Comment	
Information Request	<p>The KIA requests the following:</p> <ul style="list-style-type: none"> The required information be added to section A4 or update the cross reference to the correct section with the required information.

KIA-IR-20

IR Number	KIA-IR-20
Subject/Topic	Mismatched text
Importance	Low



References	<p>Appendix 6-M: Spill Contingency Plan:</p> <ul style="list-style-type: none"> • Immediately Reportable Spills, page 3 • Section 3.3, page 39
Summary	<p>Section 3.3 states:</p> <p><i>“In the event that a spill or an unauthorized deposit of a deleterious substance has occurred to the marine environment, the GM and/or Environmental Superintendent will notify the Canadian Coast Guard immediately”</i></p> <p>Immediately Reportable Spills section states:</p> <p><i>“Any spill to Navigable Waters (any size) must be reported to the Canadian Coast Guard”</i></p> <p>There is inconsistency between both sections, with one specifying spills to the marine environment and the other specifying navigable waters (any size).</p>
Detailed Review Comment	
Information Request	<p>The KIA requests the following:</p> <ul style="list-style-type: none"> • Both sections should be updated to list both the marine environment and Navigable Waters (any size).

KIA-IR-21

IR Number	KIA-IR-21
Subject/Topic	Mismatched text
Importance	Low
References	<p>Appendix 6-M: Spill Contingency Plan</p> <ul style="list-style-type: none"> • Appendix 5, page 46, EER Reference 4 (2) (j) • Appendix 5, page 47, EER Reference 4 (2) (o)
Summary	<p>These sections of the E2 Regulations Cross-Reference Table include a cross reference to Module C Plate C.1 to C.4, however there are only Plates C.1 and C.2. There are also references to Module D Plate D.1 to D.3., however there are only Plates D.1 and D.2.</p>



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Detailed Review Comment	
Information Request	<p>The KIA requests:</p> <ul style="list-style-type: none"> Both sections should be updated to list both the marine environment and Navigable Waters (any size).

KIA-IR-22

IR Number	KIA-IR-22
Subject/Topic	Fish and Fish Habitat (Offset)
Importance	High
References	<p>Appendix 4C: Analysis of Water Withdrawals at Hope Bay (ERM 2025)</p> <p>Section 3.0 Fisheries Analysis Section 3.1 Lakes, Section 3.2 Outlet Streams Section 3.2.2.1. Fish Passability Section 3.2.2.2. Open Water Timing and Wetted Channel Area</p>
Summary	The submission lacks sufficient information on fish passability, and habitat impacts under updated operations and higher water withdrawals.
Detailed Review Comment	Very limited information regarding fish passability due to operational update and increased water withdrawals are presented. Assessment of fish and fish habitat, and environmental flow needs due to operational updates are needed.
Information Request	<p>Provide assessments and related information in terms of specific life histories and specific freshwater fishes considered for fish passability assessment and implications due to water withdrawals.</p> <p>Provide additional survey data and analysis to determine the net loss of wetted usable habitat for life-cycles stages and habitat use for fish species in Doris Lake, Windy Lake, Patch Lake, and Doris Creek.</p>



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KIA-IR-23

IR Number	KIA-IR-23
Subject/Topic	Fish and Fish Habitat (Offsetting)
Importance	High
References	Appendix 6 Q Conceptual Fish Offsetting Plan Table 3.8, Table 3.9
Summary	Habitat loss or alteration occurred in both watercourse and waterbody that includes 8 watercourses (outflow and inflow) and 5 ponds. Habitat gain offsetting measures are implemented for waterbodies (5 ponds) but no offsetting measures are provided for the 8 watercourses where there were reported habitat losses: Doris Outflow, Windy Outflow, Little Roberts Outflow, Ogama Inflow, Ogama Outflow, Imniagut Outflow, Patch Outflow, and PO Outflow.
Detailed Review Comment	Offsetting measures for the 8 Outflow systems were provided in previously submitted offsetting plan (ERM 2018, Appendix H). However, these are now absent in current offsetting designs for the 8 watercourses.
Information Request	Provide offsetting measures for the 8 watercourses that are impacted due to operational updates. If not offsetting, provide explanation and related implications for not providing offsetting fish habitats for the 8 watercourses Provide explanation and rationales for changes in the current offsetting plans in relation to no habitat gains/offsets for the 8 watercourses that are impacted from previously submitted offsetting plan (ERM 2018).

KIA-IR-24

IR Number	KIA-IR-24
Subject/Topic	Fish and Fish Habitat (Offsetting)
Importance	High
References	Appendix 6 Q Conceptual Fish Offsetting Plan Table 3.8, Table 3.9



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Summary	Lake Trout and Slimy Sculpin are expected to have habitat losses due to operational updates. However, habitat losses are not offset for these two species (see Table 3.8).
Detailed Review Comment	Offsetting for Lake Trout were considered previously in the offsetting plan (ERM 2018, Appendix H). Offsetting for Lake Trout is absent from the current offsetting design.
Information Request	Provide offsetting measures for Lake Trout and Slimy Sculpin. Provide scientific rationales for omitting offsetting plans for Lake Trout and Slimy Sculpin.

KIA-IR-25

IR Number	KIA-IR-25
Subject/Topic	Fish and Fish Habitat (Aquatic Invasive species, Marine)
Importance	High
References	Appendix 6Q: Conceptual Fish Offsetting Plan Appendix G – DFO correspondence
Summary	DFO recommended an AIS monitoring program in April 2023, but no such program is included in the submission, and potential effects on marine or freshwater environments are not addressed.
Detailed Review Comment	In April 2023, DFO recommended (22-HCAA-02496) AIS monitoring program to evaluate changes to marine habitats and organisms and to monitor for non-native introductions resulting from Project-related construction and shipping in the marine environment. There is no mention of any monitoring program addressing marine habitats and/or non-native introductions in the Marine environment, nor any potential influence on the freshwater environment.
Information Request	Provide an AIS monitoring program that addresses how operational updates may influence marine habitats and evaluates any associated implications for fish and fish habitat in the freshwater environment. Provide scientific rationales for omitting AIS monitoring and related impacts to freshwater environment



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KIA-IR-26

IR Number	KIA-IR-26
Subject/Topic	Groundwater Inflow Uncertainty from Limited Under Ice Lake Level Monitoring in 2024
Importance	Medium
References	2024 Annual Report – Water Management & Groundwater Sections 2024 AEMP Report – Hydrology & Lake Level Monitoring Doris–Madrid Water Management Plan, Sections 3.1.3 & 4.1.3 Groundwater Management Plan, Sections 2.1, 2.2, 4.0.
Summary	It is well known to the project team that talik driven groundwater inflows remain a key hydrogeologic consideration at the Doris and Madrid underground workings. As mentioned in comment KIA-NIRB-HH-01, during 2024, under ice lake level monitoring failures at 7 of the 8 stations limited evaluation of hydraulic gradients between surface water bodies and mine workings over this period.
Detailed Review Comment	Confirmation of lake–mine connectivity, seasonal hydraulic response, and consistency with groundwater model assumptions was therefore constrained. This does not indicate adverse inflow conditions; however, it limits independent verification of conditions during 2024 that could inform inflow projections, trigger thresholds, and groundwater model calibration.
Information Request	To make up for this lost data, consideration could be given to the development of proxy or reconstructed hydrographs using snowpack, meteorological, and/or inflow/outflow relationship data. This assessment could help bound uncertainty in lake-level behaviour to support future modelling work.

KIA-IR-27

IR Number	KIA-IR-27
Subject/Topic	TIA Water Balance Calibration and Hydrologic Uncertainty
Importance	Low
References	2024 Annual Report – Tailings Impoundment Area Operations & Water/Load Balance Model Summary; 2024 AEMP Report – Hydrology & Lake Level Monitoring Results; Doris–Madrid Water Management Plan, Sections on storage, routing & runoff



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	outputs, and provides empirical ranges of potential seepage volumes/rates to inform planning.
Detailed Review Comment	Because such events can temporarily exceed treatment/storage envelopes and stress water management thresholds, but are not representative of the broader hydrogeological conditions, they must be managed through adaptive site response and monitoring/mitigation planning.
Information Request	Prepare an adaptive response plan for discrete high-inflow features (i.e., exploration holes/structures) and maintain rapid grouting/isolation capability on site.

KIA-IR-31

IR Number	KIA-IR-31
Subject/Topic	Mine Water Monitoring Frequency and Adequacy During Variable Flow Conditions
Importance	Low
References	2024 Annual Report – Mine Water Management, Discharge Compliance & Groundwater Monitoring; 2024 AEMP Report – Hydrology (Lake Levels, Connectivity) and Water Quality Components; Doris–Madrid Water Management Plan, Monitoring Requirements for Mine Water Stations (e.g., TL-12, ST-14, ST-15); Groundwater Management Plan (2026 V5), Sections 2.1–2.3 (Mine Inflows, Chemistry, Discharge) and Section 5.2 (Mine Inflow Quality Monitoring).
Summary	Mine inflow chemistry is identified as an important management consideration. The 2024 reporting provides limited synthesis of inflow source attribution and geochemical differentiation between saline, freshwater, and contact water contributions.
Detailed Review Comment	While not a critical item to complete at this time, differentiating these sources is important for predicting treatment demand, routing decisions, and segregation performance within SP1, SP2, and the TIA. Linking inflow chemistry trends to hydrogeologic source zones, seasonal variability, and mine development progression and the integration of major ion chemistry, chloride mass loading, and temporal concentration trends with inflow volumes would improve understanding of source contributions and support predictive inflow modelling.



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Information Request	Providing a synthesis of mine inflow chemistry that differentiates saline versus non-saline source contributions, supported by major ion ratios, chloride loading trends, and temporal variability analysis, would strengthen hydrogeologic interpretation. Linking these findings to routing and treatment strategies would further demonstrate alignment between geochemical characterization and operational management.
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KIA-IR-32

IR Number	KIA-IR-32
Subject/Topic	Hydrologic Connectivity and Runoff Routing Modifications Resulting from 2024 Construction
Importance	Medium
References	2024 Annual Report – Construction Activities & Water Management Sections
Summary	2024 construction and land disturbance may have altered local drainage patterns, which may require updates to drainage mapping and surface hydrology reporting.
Detailed Review Comment	The 2024 Annual Report identifies infrastructure activities, including road upgrades, pad development, quarry operations, and fuel line modifications, that could modify surface-water drainage around the Doris and Madrid areas. Updated drainage mapping, runoff patterns, and confirmation that non-contact water diversions remain effective were not presented, despite Water Management Plan requirements to maintain separation of contact and non-contact water.
Information Request	Provide updated grading and drainage maps/drawings that incorporate all 2024 disturbance areas. Comparison of pre- and post-2024 hydrologic connectivity could be beneficial to identify changes in contributing areas, flow paths, and diversion effectiveness. Confirm that existing non-contact water diversion structures remain adequate or identification of required enhancements. Update AEMP monitoring requirements as needed.



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KIA-IR-33

IR Number	KIA-IR-33
Subject/Topic	Mean annual discharge in FEIS and the updated assessment for Doris, Patch and Windy Lakes.
Importance	Medium
References	Analysis of Increased Water Withdrawals at Hope Bay, Appendix 4-C, Section 2.2.3 Comparison to Final Environmental Impact Statement, P14/54.
Summary	The updated assessment of mean annual discharge for Doris, Patch and Windy Lakes is 27%, 68% and 122% respective to that predicted in the FEIS. This statement contradicts the statement on p. 15/54, which states differences of nearly zero between updated assessment and FEIS for Doris Lake, from 23.8% to 8.1% for Patch Lake and from 7.5% to 9% in Windy Lakes. It is unclear how variation of this magnitude would have occurred, decreasing confidence in model outputs.
Detailed Review Comment	The Increased Water Withdrawal Study calculated mean annual discharge results and when compared to the Final Environmental Impact Study (FEIS) the modelled reductions are substantially different. In addition, the results in one paragraph differ from the results in the following paragraph. Differences are also observed in the mean monthly discharges with June freshet flows modelled to be smaller and with variability in August, September and October. These differences are attributed to improved understanding of the Mine's hydrologic system from the availability of a longer monitoring record; however, no evidence is provided to support this theory.
Information Request	Rationale for these differences should be provided. Arguments should also be provided to support or refute the conclusion that the current assessment is correct and that these data should be used in the final calculations of impact. Also, the discrepancy should be addressed.

KIA-IR-34

IR Number	KIA-IR-34
Subject/Topic	Edits identified in Document Control Table.



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Subject/Topic	Water management and conveyance infrastructure
Importance	Medium
References	Appendix 4F - Mine Plan Operational Update: Water and Load Balance Model, Sub-appendix B WLB Model Design Basis
Summary	It is unclear how the changes in mine plan and associated water management have been incorporated into the design and sizing of water management and conveyance infrastructure.
Detailed Review Comment	In meetings with KIA, Agnico Eagle has provided clarity on the influence more conservative climate change models will have on the water balance and hydrodynamic models during the operation phase. We note however that a sensitivity analysis does not appear to have been presented for the water and load balance. We understand that the influence on water quality of either successive wet or dry periods can be managed through water treatment, but it is unclear whether the influence of successive wet years and greater than anticipated inflows to the underground have been incorporated into the water balance. We are particularly concerned that the sizing of newly proposed water management infrastructure in conjunction with the capacity to draw down water contained therein may not be sufficient to preclude use of the emergency spillway.
Information Request	Please incorporate a discussion of the sizing of water management and water conveyance infrastructure relative to the updated water balance into the water and load balance model update appendix or other document where Agnico Eagle suggests it may be better situated. If that exercise has been completed but not included in the Operational Update, please do so to provide the NIRB and reviewers additional confidence in infrastructure sizing.

KIA-IR-37

IR Number	KIA-IR-37
Subject/Topic	Climate Change impacts to Tailings Storage Approach
Importance	Medium



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References	Main Application Document, P36/44, 4.4 Water and Sediment Quality, 4.4.1 Results of Study
Summary	The impact of a warming climate does not appear to have been considered in the characterization of the long-term chemical stability of dry stacked tailings and associated discharges.
Detailed Review Comment	<p>Agnico Eagle has selected the climate change scenario SSP2-4.5 <i>“for the water balance and water quality model to align with the model used by the engineering team for engineered structures and is also consistent with the climate scenario used at Meliadine Mine. The climate change scenario SSP2-4.5 predicts warmer and dryer conditions in Nunavut, leading to less meteoric inputs over time.”</i> Agnico Eagle further notes that <i>“A sensitivity analysis was completed to compare the model results with SSP2-4.5 climate scenario versus the more conservative SSP5-8.5 climate scenario.”</i></p> <p>While the sensitivity analysis appears to support that potential risks to water quality during the operational life of the project under a less conservative climate change scenario are minimal, potential long-term implications of climate change to water and sediment quality discharged from the TIA in closure and post closure are not considered.</p>
Information Request	Please provide a discussion supported by appropriate evidence (at Agnico Eagle’s discretion) to clarify the potential risks climate change may incur to the long-term chemical stability of the TIA which will contain tailings that are not expected to be water capped (i.e., dry stacked tailings) and associated post closure discharges which will not be subject to treatment.

KIA-IR-38

IR Number	KIA-IR-38
Subject/Topic	Conservative Geochemical Source Terms
Importance	Medium
References	Appendix 4F - Mine Plan Operational Update: Water and Load Balance Model, Sub-appendix B, Section 3.2 Geochemical Source Terms, P.40/209.
Summary	It is unclear how conservative geochemical source terms were incorporated into the Water and Load Balance Model, and



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	whether potential associated alterations to model outputs may require reconsideration of the proposed treatment approaches to meet Metal and Diamond Mine Effluent Regulations (MDMER) effluent quality criteria (EQC).
Detailed Review Comment	<p>Agnico Eagle indicates that <i>“base case and conservative case concentrations were incorporated into the [Water and Load Balance] model”</i>. It is unclear from the modeling provided how these two scenarios were addressed and incorporated into the outputs; only the base case appears to have been incorporated.</p> <p>While we understand that contact water will be treated, modelling that clearly includes conservative case concentrations will provide greater confidence in the identified contaminants of potential concern in both the fresh and saline effluent streams, and that the selected treatment approach(s) will be sufficient to ensure MDMER effluent quality criteria will be met in discharges to Robert’s Bay.</p>
Information Request	<p>Please clarify how conservative geochemical source terms were incorporated into the Water and Load Balance Model and include graphical / numerical outputs to support a comparison between base case and conservative case model scenarios.</p> <p>Accompany this clarification with an assessment of whether the current suite of contaminants of potential concern should be updated, and whether the proposed treatment approaches for both saline and fresh contact water streams remain appropriate to meet MDMER EQC in discharges to Robert’s Bay.</p>

KIA-IR-39

IR Number	KIA-IR-39
Subject/Topic	Pumping Rates
Importance	High
References	Appendix 4F - Mine Plan Operational Update: Water and Load Balance Model, Sub-appendix B, Section 5.2 Pumping Rates P49/209.
Summary	Capacity of pumping rates maintained from the previous iteration of the project (i.e., prior to the operational update) to



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	maintain dry sumps and ponds up to and including the inflow design flood has not been demonstrated.
Detailed Review Comment	<p>Agnico Eagle indicates that <i>“Table 5-2 summarizes estimated maximum pumping rates for proposed Life-of-Mine surface water collection infrastructure. These reported rates (SRK 2024d) are expected to be sufficient to maintain dry sumps and ponds up to and including the inflow design flood (IDF).”</i></p> <p>It is unclear what evidence is being relied upon to support the conclusion that the SRK 2024 reported rates are expected to be sufficient.</p>
Recommendation/Request	Please clarify what evidence Agnico Eagle is relying upon to determine that the SRK 2024 pumping rates are sufficient to maintain dry sumps and ponds up to and including the inflow design flood over the life of the project, and present that evidence.

KIA-IR-40

IR Number	KIA-IR-40
Subject/Topic	TIA Parameter Concentrations Across Tailings Deposition Approaches
Importance	High
References	Appendix 4F - Mine Plan Operational Update: Water and Load Balance Model, Appendix D.
Summary	Three patterns in parameter concentrations are modeled across the transition from conventional to thickened and finally dry stack deposition approaches. Rationale for these three separate patterns has not been provided.
Detailed Review Comment	<p>There appears to be three patterns of modeled parameter concentrations in the TIA across the shifts in depositional approaches.</p> <p>Several parameters including fluoride, chloride and cadmium modeled during the life of the project are predicted to be relatively elevated during the deposition of conventional tailings then decrease during the subsequent transitions to thickened and then dry stack tailings.</p>



	<p>testing in saline effluent, inferred in part through the following text:</p> <p><i>“As part of MDMER requirements, the mine cannot deposit an effluent containing prescribed deleterious substances that exceed the maximum authorized concentrations outlined in Table 2 of Schedule 4 of the Regulations; the pH of the effluent must be between 6 to 9.5 and it cannot be acutely lethal to:</i></p> <ul style="list-style-type: none"> • <i>Daphnia magna</i> when effluent salinity is below 4 parts per thousand (ppt); • <i>Rainbow trout</i> when effluent is less than 10 ppt salinity; and • <i>Threespine stickleback</i> when effluent is equal or greater than 10 ppt salinity.” <p>However, it appears that the A. tonsa test requirement remains within the MDMER (Metal and Diamond Mining Effluent Regulations) for effluent with a salinity over 4 ppt.</p>
<p>Information Request</p>	<p>Can Agnico Eagle provide rationale as to why segregated effluent streams has been maintained as the preferred approach in the amendment application? Can Agnico Eagle further clarify whether saline effluent discharged from the site will be subject to A. tonsa toxicity test requirements under the MDMER?</p>

KIA-IR-42

<p>IR Number</p>	<p>KIA-IR-42</p>
<p>Subject/Topic</p>	<p>Treatment of Hydrocarbons by Water Treatment Plant</p>
<p>Importance</p>	<p>High</p>
<p>References</p>	<p>Appendix 6G Hydrocarbon Contaminated Material Management Plan, Section 3 Contaminated Material Management Strategies, p12/32.</p>
<p>Summary</p>	<p>Hydrocarbon contaminated materials may be disposed of in the TIA, but it is not clear whether the TIA water treatment plant is designed appropriately to manage hydrocarbons within the influent.</p>
<p>Detailed Review Comment</p>	<p>Agnico Eagle includes text outlining that most materials contaminated with hydrocarbons will be treated at a landfarm</p>



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	<p>facility. The following text is also included for contaminated material management strategies:</p> <p><i>“Material deemed inappropriate for landfarming due to contamination type or substrate characteristics may be placed in an underground mine for permanent storage in accordance with the Waste Rock and Ore Management Plan. Alternatively, it may be transported to the TIA or temporarily stored on a suitable liner or in appropriate containment until the final remediation option is taken. In some cases, the material may be removed from site via sealift backhaul.”</i></p> <p>While not inherently problematic, it is unclear whether the proposed water treatment plant associated with the TIA is appropriate to treat hydrocarbons present in the influent.</p>
<p>Information Request</p>	<p>Please clarify whether the TIA water treatment plant is able to treat hydrocarbon contaminated waters and provide evidence to support the position. If not, please clarify how hydrocarbon contamination in the TIA will be managed to mitigate impacts to the receiving environment.</p>