Crown-Indigenous Relations and Northern Affairs Canada
Relations Couronne-Autochtones et Affaires du Nord Canada

Water Resources Division
Resource Management Directorate
Nunavut Regional Office
918 Nunavut Drive
Iqaluit, NU, X0A 3H0

Your file - Votre référence
2AM-DOH1335
Our file - Notre référence
GCDocs# 145617334

April 20, 2026

Robert Hunter
Licensing Administrator
Nunavut Water Board
P.O. Box 119
Gjoa Haven, NU, X0B 1J0
sent via e-mail: robert.hunter@nwb-oen.ca

Re: Crown-Indigenous Relations and Northern Affairs Canada's Response to Replies to Information Requests for the Amendment & Renewal Application for the Hope Bay Project, Type A Water Licence No. 2AM-DOH1335

Dear Robert,

Thank you for the April 10, 2026, invitation to review the above-referenced Type A Water Licence completeness check for the amendment application by Agnico Eagle Mines Limited for Water Licence No: 2AM-DOH1335.

Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC) assessed the application pursuant to its mandated responsibilities under the *Nunavut Waters and Nunavut Surface Rights Tribunal Act* and the *Department of Crown-Indigenous Relations and Northern Affairs Act*. Please find CIRNAC's Information Requests for the Nunavut Water Board's consideration in the attached memorandum.

The applicant shall provide confirmation from the Nunavut Water Board that all outstanding water license fees have been paid in full prior to approval of this application.

If there are any questions or concerns, please contact me at 873-452-2525 or jordan.beer@rcaanc-cirncac.gc.ca or Andrew Keim at (867) 975-4550 or Andrew.Keim@rcaanc-cirnac.gc.ca.

Sincerely,

Jordan Beer

Jordan Beer, M.Sc.,
Water Management Coordinator

Crown-Indigenous Relations and Northern Affairs Canada | Relations Couronne-Autochtones et Affaires du Nord Canada

Completeness Assessment Memorandum

Date: April 20, 2026

To: Robert Hunter, Licensing Administrator, Nunavut Water Board

From: Jordan Beer, Water Management Coordinator, CIRNAC

Subject: **Crown-Indigenous Relations and Northern Affairs Canada's Review of the Licence Completeness Check For the Amendment Application for the Hope Bay Project, Type A Water Licence No. 2AM-DOH1335**

Region: ☒ Kitikmeot ☐Kivalliq ☐Qikiqtani

A. BACKGROUND

The Hope Bay project is a gold mine operation in the Kitikmeot region of Nunavut, operated by Agnico Eagle Mines Limited (Agnico; the Applicant). The property includes three main deposit areas: Doris North, Madrid and Boston. The main camp, Doris, is located at approximately 68° 8' 18" N and 106° 36' 30", and the Madrid deposit is further south at approximately 68° 3' 41" and 106° 35' 35". Boston is licensed under a separate Water License. The project has been in Care & Maintenance since February 2022.

The project currently involves extensive infrastructure, including three underground mine portals, a 400 person camp and milling facilities (upgrades ongoing) at Doris, multiple quarries, ore pads, and fuel farms, and an all-weather road connecting the three project sites. Water management on site involves collection of water via sumps, contact water ponds (CWPs), sedimentation ponds and saline water ponds. Water is then either discharged directly to the tundra, transferred to the Tailings Impoundment Area (TIA), or treated and transported via pipeline to the Roberts Bay marine outfall.

Waste management for the Hope Bay Project involves multiple waste streams:

- Non-hazardous waste is either incinerated, composted, or deposited at the Quarry 2 landfill site.
- Hazardous waste is required to be stored in lined secondary containment until it can be shipped off site.
- Sewage and greywater are treated at the Sewage Treatment Plant, then either discharged to tundra or deposited into the TIA.
- Hydrocarbon contaminated soil is deposited at the landfarm for remediation.
- Sludge, contaminated soil/snow/ice/water, and tailings are deposited in the TIA.
- Waste rock is store on waste rock pads and/or used for mine backfill.

Agnico is seeking an amendment for the existing license, and proposing a new license expiration date of 2048 (22 year license term). The following amendments have been submitted for approval:

- A redesign of ore processing mill at Doris to optimize production to increase capacity up to 8,000 tonnes per day.
- A transition to dry-stacked and filtered tailings.
- An increase of diesel fuel storage at Doris (extra 5 ML), Madrid (extra 10 ML) and Roberts Bay (extra 34 ML).
- An increase in Jet-A fuel storage at Roberts Bay by 2 ML.
- Widening the Windy Road to support mining at Madrid while safely accommodating higher traffic between Doris and Madrid sites.
- An increase in water withdrawal from Doris Lake (Extra 707,125 m^3) and Windy Lake (extra 116,070 m^3).
- Relocating the Madrid South Portal to Patch 7.
- Two new waste rock stockpiles at Doris.
- Three new waste rock stockpiles and one expanded stockpile at Madrid.
- One new ore stockpile at Pad T at Doris.
- Three new ore stockpiles at Madrid.
- Relocation of the existing overburden stockpile at Madrid North to the proposed Naartok West portal.
- A second overburden stockpile adjacent to CWP 2.
- The addition of a second marine outfall diffuser to Roberts Bay.
- New CWPs at Doris and Madrid.
- A decrease in blasting from 4,633,000 kg/year to 3,650,000 kg/year across Doris, Madrid and Boston (licensed under 2AMBOS-1835).
- Increase in Doris camp size to from 400 people to 800 people, and construction of a 250 person camp at Madrid.
- The addition of seven 5.6 MW diesel generators at Doris and three 1.8 MW diesel generators at Madrid.
- Two new wind turbines at Doris and Madrid.

All proposed activities are set to remain within the existing permitted footprint.

A summary of the subjects of CIRNAC's Information Requests regarding the renewal and amendment application is provided in Table 1. Documents reviewed as part of this submission are listed in Table 2 of Section B. Detailed Information Requests are provided in Section C.

Table 1: Summary of CIRNAC's information Requests

Information Request Number	Subject	Status
IR-01	Quantity of Water Involved	Unresolved
IR-02	Detailed Site Maps	Unresolved
IR-03	Items Listed as NA	Unresolved
IR-04	Missing Documents	Unresolved
IR-05	Design Assumptions and Limitations	Resolved
IR-06	Annual Reporting Template	Resolved
IR-07	Compliance Assessment	Resolved
IR-08	Drainage Pathways	Unresolved
IR-09	Geology and Minerology	Resolved
IR-10	Milling Plant Operations	Resolved
IR-11	Camp and Mine Site Population Projections	Resolved
IR-12	Predicted Climate Trends	Unresolved
IR-13	Information on Affected Water Courses	Resolved
IR-14	Watercourse Flow Rates	Unresolved
IR-15	Source Water Quality	Unresolved
IR-16	Water Intake Pump	Unresolved
IR-17	Water Management Plan	Unresolved
IR-18	Ice Road Construction	Unresolved
IR-19	Water Storage Facilities	Unresolved
IR-20	Water Distribution	Resolved
IR-21	Watercourse Crossings	Unresolved
IR-22	Watercourse Trainings	Unresolved
IR-23	Water Diversions	Unresolved
IR-24	Operations and Maintenance Plans	Resolved with Comment
IR-25	Waste Generation: Quality and Quantity	Unresolved
IR-26	Sewage Processing Capacity	Resolved
IR-27	Tailings Alternatives Assessment	Unresolved
IR-28	Discharge Criteria Rationale	Unresolved
IR-29	Emergency Response and Spill Contingency Plans	Unresolved
IR-30	Permafrost Protection	Resolved
IR-31	Sampling Personnel	Unresolved
IR-32	Laboratory Contact Information	Resolved
IR-33	Expected Water Quality and Quantity	Unresolved
IR-34	Proposed Water Works	Unresolved

Information Request Number	Subject	Status
IR-35	Saline Effluent Treatment Plant	Resolved
IR-36	Blasting Quantities	Resolved
IR-37	Water from Proximal Sources	Unresolved
IR-38	Widening of Windy Road	Unresolved
IR-39	Quarry 2 Landfill	Unresolved
IR-40	Wolverine Lake	Resolved
IR-41	Security	Resolved

B. DOCUMENTS REVIEWED

The following table (Table 2) provides a summary of the documents reviewed under the submission.

Table 2: Documents Reviewed

Document Title	Author, File No., Rev., Date
260409 2AM-DOH1335-Amendment Completeness Check - Agnico Eagle Response to IRs-ILAE	Agnico Eagle Mines Limited, April 2026
260130 2AM-DOH1335_HopeBay-WLAmendment-ApplicationForm-IMLE	Agnico Eagle Mines Limited, January 2026
181207 2AM-DOH1335 Amended Licence-OCHE	Nunavut Water Board, August 2013
260130 2AM-DOH1335_HopeBay-WLAmendment-App4-F_WBWQM-OperationalUpdate	SRK Consulting, July 2025
260130 2AM-DOH1335_HopeBay-WLAmendment-App1-B-SIG	Agnico Eagle Mines Limited, January 2026
171221-12MN001-Volume 5 Section 01. Surface Hydrology-IMTE	TMAC Resources Inc., December 2017
240126 2AM-MEL1631 Meliadine WL Amendment_AppF21-WaterMgmtPlan-v14_NWB-IMLE.pdf	Agnico Eagle Mines Limited, January 2024
Appendix 06 - 2024 Annual Geotechnical Inspection.pdf	Tetra Tech, March 2025
171221-12MN001-V5-6C_1992-2000 Aquatic Baseline Boston Project Data Comp-IMTE	Golder Associates, July 2008
171221-12MN001-V5-6D_2009 Freshwater Fish and Fish Habitat Baseline-IMTE	TMAC Resources Inc., May 2010
171221-12MN001-Volume 5 Section 04. Freshwater Water Quality-IMTE	TMAC Resources Inc., December 2017

RESULTS OF REVIEW / INFORMATION REQUESTS

1. Quantity of Water Involved

Comment:

Section 2-1 of the document "260130 2AM-DOH1335_HopeBay-WLAmendment-App1-B-SIG" (henceforth: SIG) requires applicants to complete and submit a Water License Amendment Form. The application form provided by the Applicant did not include all the requested information.

Box 13 of the document "260130 2AM-DOH1335_HopeBay-WLAmendment-ApplicationForm-IMLE" (henceforth: Application Form) asks the Applicant to provide information related to water usage. Several of the questions within this section were not answered, or were only partially answered. The following information was not provided:

a. A description of the quality of the water source(s) and the available capacity(s).
b. The estimated quantity(s) of water to be used from each source in cubic metres per day (section 6-7 of the SIG).
c. A description of the estimated quantities to be used for each purpose (camp, drilling, etc.).
d. A description of the method(s) of extraction.
e. A consistent estimation of the quantity of water to be returned to source. The application states daily discharge will vary between 3,485 m^3/day to 8,769 m^3/day throughout the life of mine, but then references section 5.2 of Appendix 4-F. The listed values do not match the values provided in Table 5-2 or Table 5-3 of Appendix 4-F.

CIRNAC is concerned that without accurate information on water sources and extraction, the potential effects of the project on nearby freshwater cannot be evaluated.

Recommendation:

(IR-01): CIRNAC recommends that the Applicant amend and resubmit the Application Form to include:

IR-01a) A description of the quality of water source(s) and the available capacity(s).
IR-01b) The estimated quantity(s) of water to be used from each source in cubic meters per day.
IR-01c) The estimated quantities to be used for each purpose (camp, drilling, etc.).
IR-01d) A description of the method(s) of extraction.
IR-01e) An accurate estimation of quantity(s) of water returned to source(s) including proposed changes.

Agnico Eagle's Response to Request:
Agnico Eagle does not believe the Application Form needs to be updated and resubmitted. Based on SIG, which is a Guideline document, Block 13 was filled in and fields were addressed.

Response to bullet 1a)
As per Block 13 of the Application Form, the quality of the water source and/or its available capacity does not change from the current Licence; therefore, additional information is not required.

Response to bullet 1b)
Estimated quantity of water per source were provided; however, in cubic metres "per year" not "per day". This was done based on Conditions within the existing Water Licence.

It is important to note that per Part E, Item 1 of Water Licence, total Water Use is based on cubic metres per YEAR not per day. Agnico Eagle is not limited to its Water Use per day, but is obligated to respect the total Water Use per year

Response to bullet 1c)
The requested totals per lake were provided in Table 3.3-1 of the Main Application Document. The table below provides a general breakdown by use type. This information can be provided in the Water Management Plan. Agnico Eagle will respect the total volume requested from each Lake.

	Doris Lake	**Patch Lake**	**Windy Lake**	**Proximal Sources**	**Total**
Total Volume Requested for Water Licence Amendment (m3/year)	**2,637,125**	**59,860**	**159,870**	**60,000**	**2,916,855**
Potable	90,000				
Process Plant	2,200,000				
Dust Suppression	25,000				
Other Industrial Uses	115,713				

Subtotal	2,430,713
Contingency	20%
TOTAL	2,916,855

Response to bullet 1d)

As per Block 13 of the Application Form, for existing water intakes, the extraction methods do not change from the current Licence; therefore, additional information is not required.

For future intakes, similar extraction methods would be used. Design of new water intake infrastructure is currently underway. Agnico Eagle will submit a 60-day notice to the NWB (Part D, Item 1 of the Water Licence) and a Request for Review to DFO, where applicable, for all water taking infrastructure designs.

Response to bullet 1e)

An estimation of water quantity is provided in section 5.2 of Appendix 4-F. Tables 5-2 and 5-3 represent water quality and not quantity. Water quantity is instead summarized in Table 5-1. These are consistent with the general total daily discharges cited by CIRNAC.

Responses to Replies:

IR-01a):

As per the exact wording in Box 13 of the Application Form, applicants are asked to "Describe the quality of the water source(s) and the available capacity(s). Identify any changes". Changes should be highlighted, but water quality and capacity for all sources must be identified. Even where no changes are proposed, CIRNAC requests confirmation and documentation of baseline conditions to support the amendment and renewal review.

Without the requested information, CIRNAC will be unable to proceed with assessing the potential impacts to source water bodies. CIRNAC reiterates its previous request for a description of the quality of the water source(s) and the available capacity(s), regardless of whether there are any changes from the previous license.

IR-01b)

An understanding of the estimated quantity of water per source in cubic metres per day is important for assessing the effects of water withdrawals on water balances, particularly during seasonal lows. If Agnico estimates that water withdrawal will be the same year round, CIRNAC asks that Agnico indicate this. However, if Agnico

anticipates variable water uses throughout the calendar year, CIRNAC requests that Agnico provide this information for review.

CIRNAC reiterates its previous request that Agnico provide the estimated quantity of water per source in cubic metres per day.

IR-01c)

CIRNAC thanks Agnico for providing the breakdown of water use by use type.

IR-01d)

As per the exact wording of box 13, applicants are asked to “Describe the method(s) of extraction. Identify proposed changes”. Even where no changes are proposed, CIRNAC requires confirmation and documentation of baseline conditions to support the amendment and renewal review. Understanding the methods of extraction is an important part of assessing the potential adverse effects on shoreline disturbance and sediment entrainment risks.

CIRNAC reiterates its previous request for Agnico to describe the method(s) of extraction, regardless of whether any changes are proposed.

IR-01e)

Table 5.1 of Appendix 4-F, titled “Doris TIA operating conditions”, indicates the Minimum Operating Level (30 m) and the Full Supply Level (34 m) of the Doris TIA. It does not indicate the estimated quantity(s) of water returned to source(s).

Table 5.3 “Pumping rates applied to reservoirs within the WLB model” exists under section “5.3 Discharge”. This table indicates that the maximum pump capacity of the TIA discharge is 6,750 m^3/d in operations or 10,000 m^3/d in closure. It also indicates that the maximum pump capacity of the saline water discharge of 400 m^3/hr, or 9,6000 m^3/d. If both discharges are operating at full capacity, this would indicate a maximum daily discharge of 19,600 m^3/d.

The Application form indicates that over the life-of-mine, daily discharge will vary between 3,485 m^3/day to 8,769 m^3/day, which is quite different from the 19,600 m^3/d in the referenced section.

CIRNAC reiterates its question, and asks Agnico to provide a clear estimation of quantity(s) of water returned to source(s), and indicate which values are most accurate.

2. Detailed Site Maps

Comment:

a) Section 3-7 of the SIG (Supplemental Information Guidelines) required the Applicant to provide a map at a 1:50,000 scale based on the National Topographic Series indicating the location of the undertaking, watercourses and the location of waste deposits.

The maps provided to meet this requirement were shown at a 1:250,000 scale and a 1:340,000 scale, respectively. These maps only showed basic outlines of site and infrastructure, did not label the surrounding water courses, and did not show the locations of waste deposits. CIRNAC was unable to locate a map in any of the other documents that meet the listed requirements.

b) Section 4.1 requires the Applicant to provide maps and/or aerial photos of all project infrastructure (see the listed infrastructure in section 4.1a-4.1y of the SIG) for the Local Project Area (LPA) and/or the Regional Project Area (RPA). The maps or photos should allow the determination of distances between objects depicted and differentiation of any temporary components.

Most of the sections indicated by the Applicant to meet this requirement did not contain any maps. The most detailed maps were found on pages 9 and 10 of the document “260130 2AM-DOH1335_HopeBay-WLAmendment-App4-F_WBWQM-OperationalUpdate” (henceforth: Water and Load Balance Model), but even these maps were not detailed enough to distinguish between all infrastructure and lacked some of the necessary components (e.g. raw water intake). CIRNAC was unable to locate a map or collection of maps that provided the requested information in section 4.1a through 4.1y of the SIG.

CIRNAC is concerned that without a thorough understanding of the overall site layout, it cannot accurately assess the effects of the project and proposed amendments.

Recommendation

IR-02a) CIRNAC recommends that the Applicant provide a map at a 1:50,000 scale based on the National Topographic Series indicating the location of the undertaking, watercourses and the location of waste deposits.

IR-02b) CIRNAC recommends that the Applicant provide a map or image (or a series of maps or images) that show and label all of the components listed in section 4.1a through 4.1y of the SIG. CIRNAC recommends that the map(s) be created at a scale such that the distance between objects can be determined, and that any temporary or proposed components are differentiated from permanent existing components.

Agnico Eagle's Response to Request:

Response to bullet 2a)
Agnico Eagle notes the Operational Update does not change location of the scope. The Operational Update is within the same Project Development Area, which includes watersheds and watercourses (refer to response to KitIA-IR-03).

Response to bullet 2b)
The SIG notes (emphasis added) "…to provide maps and/or aerial photos of all project infrastructure for the Local Project Area (LPA) and/or the Regional Project Area (RPA) where applicable". Agnico Eagle feels appropriate maps were included; however, overall site layouts are provided through Annual Reports which clearly depict new infrastructure built annually and existing infrastructure. The as-constructed drawings (as provided in the 2025 NWB Annual Report) are provided in Attachment A of this response package.

With respect to new water or waste infrastructure, design reports are submitted 60-days prior to construction (per Part D, Item 1 of the Water Licence). These reports will include the infrastructure location on-site. Once an infrastructure is constructed, the facility will be included in Annual Report As- built drawings.

Responses to Replies:

IR-2a)
While the updated maps are still not at the listed scale, CIRNAC considers the level of detail sufficient to identify key project components, watercourses, and waste deposits for the purposes of this review.

IR-2b)
References to Annual Reports, future design submissions, or post-construction as-built drawings do not meet CIRNAC's requirements for the current application review.

The as-construction drawings provided in Attachment A of the response package still do not show the location of the following project components:

- The raw water intake at Doris Lake
- The water distribution systems (e.g. chutes, pipes)
- Drainage pathways
- Watercourse crossings
- Incinerator
- Landfarm

Without this information, CIRNAC cannot adequately assess the spatial relationships between infrastructure and water features, and the application may be considered

incomplete. CIRNAC requests that the provided maps be updated to include the project components listed above, including clear labels and a scale sufficient to determine distances between infrastructure and water features.

3. Items Listed as NA

Comment:
The Applicant has answered numerous requirements of the SIG with “NA” and justified this response by either “No change from current Licence”, “Current practices will be applied” or “No change from current Annual Reporting”. CIRNAC notes that this is an application for a license renewal, not just a license amendment, and therefore all parts of the project are subject to review.

Recommendation:
IR-03) CIRNAC recommends updating and resubmitting the SIG to change all instances where the response has been listed as “NA” with the justification of “No change from current Licence”, “Current practices will be applied” or “No change from current Annual Reporting”. If the Applicant maintains that the requirement is not applicable, CIRNAC recommends providing justification of how it does not apply to the project. Otherwise, CIRNAC recommends providing the requested information to allow the application to proceed.

Agnico Eagle’s Response to Request:

As per the following excerpts of NWB Guidelines (Guide 4, Part 1, item 6):

The applicant should address the SIG to the best of their ability, recognizing that some of the information requested may not be relevant to the project under consideration. If specific information is requested by the SIG that does not relate to the project, the applicant is requested to indicate “N/A” (Not Applicable) in the concordance table and provide a justification.

Agnico Eagle did provide our justification to the fields listed as “N/A” in Appendix 1-B of the Water Licence Application. Based on the Guidelines, Agnico Eagle has provided justification.

Response to Reply:

As per CIRNAC’s original comment, CIRNAC does not feel that “No change from current License”, “Current practices will be applied” or “No change from current Annual Reporting” is a valid justification to indicate a field is Not Applicable during a Renewal and Amendment Application review.

As indicated in box 25 of the Application form, when asked “Is the Licensee applying for a combined renewal and amendment of the existing license?” Agnico indicated “Yes” and proposed extending the end date to March 2048.

CIRNAC therefore reiterates its request to resubmit the SIG to change all instances where the response has been listed as “NA” with the justification of “No change from current Licence”, “Current practices will be applied” or “No change from current Annual Reporting”. If the Applicant maintains that the requirement is not applicable, CIRNAC recommends providing justification of why it is not relevant to any part of the project, existing or proposed. Otherwise, CIRNAC recommends providing the requested information to avoid further delays in the amendment and renewal review process.

4. Missing Documents

Comment:
In the SIG, the Applicant has referenced multiple documents, including the Madrid-Boston Project Final Environmental Impact Statement (FEIS) and previous Annual Reports, that were not provided as a part of the application package. CIRNAC is of the opinion that all documents required to properly assess a renewal and amendment application should be submitted as part of the application process, since this ensures all parties are referencing the same document version.

Recommendation:
IR-04) CIRNAC recommends submitting all documents referenced in the SIG table that were not provided in the original application package.

Agnico Eagle’s Response to Request:

The historical 2017 Madrid-Boston FEIS and associated Water Licence Amendment files are located on the NIRB and NWB registries. It should be noted that these historical baseline reports were reviewed and received conformity approval as part of the 2017 Madid-Boston FEIS submission, and then final approval under Project Certificate No. 009. These baseline reports remain unchanged.

The following 2017 Madrid-Boston FEIS documents were referenced in the SIG and are available on the

NIRB registry:

- Volume 2, Section 3 – NIRB ID: 314922
- Volume 2, Section 4 – NIRB ID: 314921
- Volume 4, Section 7 – NIRB ID: 314902

• Volume 4, Section 8 – NIRB ID: 314901
• Volumes 4-6 – NIRB ID: 314723 to 314908
• Volume 5, Section 3 – NIRB ID: 314854
• Volume 5, Section 4 – NIRB ID: 314853
• Volume 5, Section 6 – NIRB ID: 314848
• Volume 6. Section 4 – NIRB ID: 314742

Response to Replies
CIRNAC thanks Agnico for providing the relevant NIRB IDs for the referenced documents. CIRNAC concedes that referenced documents may reside on public registries, however the Applicant is requested to provide clear and specific cross-referencing sufficient to permit reviewers to efficiently locate the exact information being relied upon. General references to entire volumes or broad document ranges (e.g. volumes 4-6) are also not sufficient; CIRNAC requests references that are specific to the relevant sections.

CIRNAC continues to request that Agnico submit an updated SIG table indicating which annual reports, which documents/appendices and which sections within those documents are being referenced to answer sections 5-7, 5-11, 5-28a, 6-20, 6-22, 6-33, 7-5, and 7-10. Additionally, CIRNAC requests more specificity regarding which sections of volume 4-6 are being referenced to answer certain requirements. Without clear cross-referencing, CIRNAC cannot efficiently verify the information relied upon in the application, which may delay the review.

8. Drainage Pathways

Comment:
CIRNAC notes the following missing information related to drainage pathways and water regimes:

a. No outline of the drainage basin and drainage patterns within the RPA were provided (Required by Section 4-1c of the SIG).
b. No outline of the drainage basin and drainage patterns within the LPA were provided (Required by Section 5-4 of the SIG).
c. The drainage patterns within the solid waste disposal areas were not provided (Required by Section 4-1j of the SIG).

CIRNAC cannot assess whether the proposed water management strategies are sufficient without an adequate description of the drainage patterns within the LPA and RPA, and maps showing how the water management infrastructure will affect the flow paths.

Recommendation:

IR-08a) CIRNAC recommends the Applicant provide an outline of the drainage basin and drainage patterns within the RPA.

IR-08b) CIRNAC recommends the Applicant provide an outline of the drainage basin and drainage patterns within the LPA, including the existing and proposed water management infrastructure.

IR-08c) CIRNAC recommends the Applicant provide a detailed depiction of the drainage patterns within the solid waste disposal area(s).

Agnico Eagle's Response to Request:

Figures 1.2-1 to 1.2-4 referenced under Section 4-1c of the SIG highlights the areas of infrastructure for the Water Licence Amendment. In addition, the local and regional project areas for the Operational Update are the same areas as those from the 2017 FEIS and the current water licence. The reader is referred to drawings from the FEIS that show local and regional watershed boundaries.

Response to bullet 8a)

Regional watersheds are available in Volume 5, Section 1 of the Madrid-Boston 2017 FEIS (Fig 1.2-2; NIRB ID: 314856).

Response to bullet 8b)

Local watersheds are available in Volume 5, Section 1 of the Madrid-Boston 2017 FEIS (Fig 1.2-2; NIRB ID: 314856). Drainage patterns in the LPA are available in Figure 3.1 of Appendix 6-Q of the Water Licence Amendment application.

Response to bullet 8c)

Figure 3-1 of Appendix 4-F provides drainage patterns associated with the mine infrastructure, including solid waste disposal areas.

Response to Replies

IR-08a)

CIRNAC thanks Agnico for providing the requested figure.

IR-08b)

Figure 3.1 in Appendix 6-Q and the High-level watershed mapping from the 2017 FEIS do not provide sufficient resolution to assess site-level drainage interactions with current and proposed infrastructure. Maps should clearly depict drainage pathways, flow directions, and interactions with existing and proposed infrastructure at a scale sufficient to assess site-level water movement in order for CIRNAC to proceed with their review.

Agnico has previously demonstrated their ability to provide mine site level flow information in map form for other mine projects, including the 2024 Meliadine Mine Amendment (see Figure 6 of the document 240126 2AM-MEL1631 Meliadine WL Amendment_AppF21-WaterMgmtPlan-v14_NWB-IMLE.pdf).

CIRNAC reiterates its request that Agnico provide maps showing how the existing and proposed water management infrastructure will affect drainage patterns in the LPA.

IR-08c)

Figure 3-1 of Appendix 4-F does not indicate the location of the landfill(s), and therefore does not adequately detail the drainage patterns within the solid waste management areas. Without this information, CIRNAC cannot assess potential leachate pathways or interactions between waste disposal areas and surrounding water bodies. CIRNAC reiterates its request that Agnico provide a detailed depiction of the drainage patterns at all solid waste disposal areas at a reasonable scale.

9. Predicted Climate Trends

Comment:

Section 5-3 of the SIG requires Applicants to provide a description of the site conditions, including predicted future climate trends.

The Applicant provided a description of current climate conditions within the document Water and Load Balance Model, but did not provide a description of predicted future climate trends.

The Applicant's long-term waste and water management plans involve allowing tailings and potentially acid generating waste rock to freeze within permafrost. This plan relies on these areas remaining frozen indefinitely in order to prevent groundwater and runoff contamination.

CIRNAC is concerned that without site specific future climate trends, it cannot accurately assess the viability of the Applicant's long-term water management strategy, waste management strategy or closure predictions included in any ICRP or FCP.

Recommendation:

IR-12) CIRNAC recommends that the Applicant provide a description of the predicted future climate trends at the project site. CIRNAC recommends that all projections include worst-case scenario projections using the Intergovernmental Panel on Climate Change's Shared Socioeconomic Pathway – Representative Concentration Pathway 5-8.5.

Agnico Eagle's Response to Request:
Agnico Eagle considers climate change in all modelling activities. As it pertains to this application, Agnico Eagle determined that SSP2-4.5 climate scenario was the most appropriate given the timeline of the modelling (2030's to 2040's). In general, IPCC's SSP models are relatively similar in this century up until the 2070's when they begin to diverge. A sensitivity analysis of flowrates was completed to directly compare SSP2-4.5 to SSP5-8.5, and this analysis concluded that process water discharge increased by 2.9% and saline discharge increased by 0.02%. From a water quality standpoint, concentrations varied by – 3.9% to 4.9%. Therefore, the lack of difference between models indicated that modelling under SSP5-8.5 is not necessary. Such modelling would be examined for long-term assessments such as closure and post-closure modelling, but not in the context of this application.

Response to Replies:
Agnico is requesting a license renewal extending to 2048 (see Application Form Box 25), with closure beginning in 2044 and post-closure beginning in 2048 (see Application Form Box 24). In order to adequately assess the appropriateness of the proposed project plans under this timeline, CIRNAC needs to be able to assess the validity of closure and post-closure plans under a climate change context. While Agnico's sensitivity analysis suggests limited differences between SSP2-4.5 and SSP5-8.5 over the operational period for process water and saline discharge, these results do not necessarily indicate inconsequential trends in other areas (e.g. permafrost stability).

CIRNAC reiterates its request that Agnico provide a description of the predicted future climate trends at the project site, extending beyond 2050s where appropriate. CIRNAC recommends that all projections include worst-case scenario projections using the Intergovernmental Panel on Climate Change's Shared Socioeconomic Pathway – Representative Concentration Pathway 5-8.5. Using a high-emissions scenario is necessary to ensure robust long-term containment strategies under plausible upper-bound climate conditions. CIRNAC cannot properly assess the proposed amendment and renewal application without the requested information.

14. Watercourse Flow Rates

Comment:
Section 5-11 of the SIG requires Applicants to provide the following streamflow data in cubic metres per second for each watercourse included in the application: mean annual flow, mean summer flow, minimum summer flow, minimum annual flow, mean annual flood, maximum summer flood, and mean summer flood.

The document "260130 2AM-DOH1335_HopeBay-WLAmendment-App4-C_AnalysisIncreasedWaterWithdrawals" contains the mean annual flow, and sufficient

information to calculate the mean summer flow, minimum summer flow, and minimum annual flow for Doris Lake outflow, Patch Lake outflow, and Windy Lake outflow, but does not include any of the other required statistics.

CIRNAC is concerned that it cannot adequately evaluate all potential effects of increased water withdrawals without the referenced baseline data.

Recommendation:
IR-14) CIRNAC recommends the Applicant provide the mean annual flood, maximum summer flood and mean summer flood in cubic metres per second for Doris Lake outflow, Patch Lake outflow, and Windy Lake outflow.

Agnico Eagle's Response to Request:
Agnico Eagle thanks CIRNAC for the recommendation and will address this IR through the technical phase of the Water Licence Amendment application.

Response to Replies:
CIRNAC reiterates that the requested information is vital in order to conduct an appropriate technical assessment of the application. These flow statistics are required to assess system response under high-flow conditions and to evaluate the potential effects of water withdrawals on receiving environments. CIRNAC reiterates its request to provide the mean annual flood, maximum summer flood and mean summer flood in cubic metres per second for Doris Lake outflow, Patch Lake outflow, and Windy Lake outflow before moving to the technical review.

15. Source Water Quality

Comment:
Section 6-5 of the SIG requires Applicants to provide a description of the quality of the water from the source(s) for each season (summer, fall, winter, spring). The Applicant referenced Appendix D of the Water and Load Balance Model to meet this requirement. However, Appendix D provides calculated end-of-pipe water quality results, not a description of source water quality. Appendix B provides background water chemistry averaged from Tail Lake and Doris Lake, but does not provide information on Patch Lake, Windy Lake, or Doris Lake by itself.

CIRNAC is concerned that it cannot evaluate the project's effects on water quality without baseline source water quality data.

Recommendation:

IR-15) CIRNAC recommends that the Applicant provide a description of the quality of the water from each of Windy Lake, Patch Lake, and Doris Lake for each season (summer, fall winter, spring).

Agnico Eagle's Response to Request:

Agnico Eagle acknowledges the SIG incorrectly referenced the wrong document. Water quality samples have been collected from lakes within the local study area and regional study area dating back to 1992.

Volume 5, Section 4.2 of the 2017 Madrid-Boston FEIS provides historical details of water quality from various lakes (NIRB ID: 314853), and provides information on seasonality and sampling results.

Response to Replies

Volume 5, Section 4.2 of the 2017 Madrid-Boston FEIS provides historical water quality data for Doris Lake, Patch Lake and Windy Lake, but still does not separate water quality by season (summer, fall, winter, spring). This information is essential to assess potential changes in water quality, including during critical periods such as freshet and low-flow conditions. Without this information, CIRNAC will be unable to proceed with its technical review.

CIRNAC repeats its request that Agnico provide a description of the quality of the water from each of Windy Lake, Patch Lake, and Doris Lake for each season (summer, fall, winter, spring). This may be provided as seasonal summary statistics (e.g., mean, range) based on available monitoring data. Where seasonal data are limited, CIRNAC recommends that the Applicant describe the methodology used to derive seasonal estimates.

16. Water Intake Pump

Comment:

Section 6-8 of the SIG requires Applicants to provide a description of the water intake method including the intake facility, the operating capacity of the pump used, the details of any screening to exclude fish, and the distance the pump will be placed from the ordinary high water mark of the watercourse.

Section 6-9 of the SIG requires Applicants to provide a description of the general condition of any existing water intake facility, and rate the condition of the facility as satisfactory or unsatisfactory and explain the rating.

CIRNAC found indication that the new Windy Lake intake pipeline will be installed with a fish screen in Section 3.2.10 of the document “260130 2AM-DOH1335_HopeBayWL Amendment-App6-P_Doris-MadridWaterMgmtPlan_Jan2026_V20” (henceforth: Water Management Plan), but was unable to locate any of the other requested information.

Recommendation:

IR-16) CIRNAC recommends that the Applicant provide the following information:

IR-16a) A description of the operating capacity of the pump(s) used.

IR-16b) The distance between the pump(s) and the ordinary high water mark of the watercourse.

IR-16c) A description of the condition of any existing water intake facilities, and a rating of the facility as satisfactory or unsatisfactory with an explanation of the rating.

Agnico Eagle’s Response to Request:

Response to bullet 16a)

A description of freshwater usage is provided in Section 5.3.1 of Appendix B of Appendix 4-F. Also see response to CIRNAC-IR-01.

Response to bullet 16b)

Please note that there are no requirements for minimum distance between a pump and the ordinary highwater mark.

Response to bullet 16c)

Existing water intake facilities are located in Doris and Windy lakes.

The existing Doris Lake Freshwater Pumping Station is rated satisfactory for current use, but unsatisfactory for long-term operations. While the facility is currently operational, it does not provide sufficient capacity or redundancy to reliably meet design flow requirements under all anticipated operating conditions. To ensure a robust and reliable freshwater supply consistent with future operational needs, a new freshwater pumping station is planned to replace the existing facility. Replacement date is to be confirmed.

The existing Windy Lake South Freshwater Pumping Station is located a significant distance south of the Potable Treatment Plant (PTP). The facility is equipped with a suction line and redundancy. The current station fills tanker trucks that transport fresh water to the PTP, where it is subsequently treated to produce potable water. The pumping system relies on diesel-powered pumps.

The existing Windy Lake facility is rated satisfactory for current use, but unsatisfactory for long-term operations due to dependence on truck hauling and the requirement for diesel pump use. For this reason an update to the intake will be completed.

Response to Replies

IR-16a)

CIRNAC has requested the operating capacity of the pump used, i.e. a description of the pumping rate. Section 5.3.1 of Appendix B of Appendix 4-F indicates the maximum annual volume of water that can be obtained from Windy Lake, Doris Lake, and Proximal Sources, but makes no reference to the pump capacity. Also see CIRNAC's response to CIRNAC-IR-01.

CIRNAC repeats its request for a description of the operating capacity of the pump(s), including maximum and typical pumping rates (e.g. m^3/s or m^3/day) for each intake, in order to assess the effects on intake velocity and localized drawdown. CIRNAC requires this information in order to complete a comprehensive technical review.

IR-16b)

While there is no set requirement for minimum distance between a pump and the ordinary highwater mark, the location where the pump is placed can affect bank disturbance and sediment entrainment. CIRNAC repeats its request for the distance between the pump(s) and the ordinary high water mark of the watercourse in order to properly assess all potential freshwater effects of the application. CIRNAC is of the opinion that this information is necessary for a complete technical review.

IR-16c)

CIRNAC thanks Agnico for their description and rating of existing water intake facilities.

17. Water Management Plan

Comment:

Information on water management for the project is provided via text in the Water Management Plan and summarized within Figure 1: Water Management Flow Diagram-Doris and Madrid. However, CIRNAC noted numerous areas where the text and the flow diagram appear to contradict each other. Of note:

a. Section 3.1.3.1 indicates that mine water from Doris mine with be treated and discharged to Roberts Bay, either directly, or via Saline Pond 2. However, the flow diagram shows mine water pumped to Saline Pond 1, not Saline Pond 2.
b. Section 3.1.4 indicates that process water is sourced from Doris Lake and the reclaim pond. However, the flow diagram shows process water flowing from the Doris Process Plant towards the TIA.

c. Section 3.2.3.1 indicates that CWP 2 will be pumped directly to the TIA, but the flow diagram shows water from CWP 2 flowing into the Doris Sediment Control Pond.
d. Section 3.2.5 indicates that Sump 1 is constructed downstream of the Sedimentation CWP 1, however the flow diagram shows Sump receiving seepage from rock pads and ore pads then pumping water into CWP 1.
e. Section 3.2.6.1 indicates that process water in excess of what is recycled in the Doris process plan will flow into the TIA. However, the flow diagram shows process water flowing from the TIA to the Doris Process Plant.
f. Section 3.2.8.1 indicates than non-compliant quarry water would be transported to the TIA, but the flow diagram shows quarry water being directed to the Doris Sediment Control Pond.
g. Section 3.2.11 indicates that details on the landfarm can be found within the *Hydrocarbon Contaminated Material Management Plan*. The document “260130 2AM-DOH1335_HopeBay-WLAmendment-App6-G_Hydrocarbon ContamMatMgmtPlan_Nov2025_V5” indicates that water from the landfarm that does not meet tundra discharge criteria will be transported to the TIA. However, the flow diagram shows water from ancillary facilities being transported to the Doris Sediment Control Pond.
h. Section 4.1.3 indicates that the Madrid North mine will intercept talik below Patch, Windy and Imniagut Lakes and mining at Madrid South is expected to intercept the talik below Wolverine and Patch Lakes. However, the flow process diagram only shows potential drawdown through taliks from Patch, Imniagut and Wolverine Lakes into the Madrid Mine (i.e., it does not include drawdown from Windy Lake)
i. Section 4.1.5 indicates that there will not be a camp at the Madrid North or South sites, and sewage water will be trucked to Doris Site sewage treatment facility. However, the flow diagram indicates flow of treated water to Madrid Camp and subsequently to a Sewage Treatment Plant. Additionally, the Applicant has indicated in the Main Application Document that a camp may be constructed at Madrid to accommodate up to 250 people.
j. Table 4-1 indicates that the Madrid North Ore Stockpile reports to Sump 1, but the flow diagram indicates that the water from the Madrid North Ore Pad reports to Sump 3.
k. Table 4-1 indicates that the Madrid North Waste Rock Pile reports to Sump 1, but the flow diagram indicates that it reports to Sump 5.
l. Table 4-1 indicates that the Madrid South Waste Rock Pile reports to the Madrid South Primary CWP, but the flow diagram indicates that it reports to Madrid Sump 1.

m. Table 4-1 indicates that the Patch CWP 4 reports to the Quarry D CWP 3, but the flow diagram indicates that it flows directly to the TIA.
n. Several elements within the Flow diagram are not referenced in the rest of the document, including the Madrid S Infrastructure Pad, CWP 6, Patch 7 Infrastructure Pad, Patch 7 Ore Pad, Patch 7 Waste Rock Pad, the existing Madrid N Overburden Pad, the proposed Madrid N Overburden Pad, Madrid Sump 4, Naartok W Infrastructure Pad, Naartok E Infrastructure Pad, and Madrid Sump 2

The concern is that CIRNAC cannot adequately assess the site's water management plan if the water management processes are not documented consistently and accurately.

Recommendation:
IR-17) CIRNAC recommends that the Applicant provide an updated water management plan that demonstrates consistency between the text and its flow diagram. CIRNAC recommends using the same names for facilities between the text and the flow diagram to ensure comparability.

Agnico Eagle's Response to Request:

Agnico Eagle appreciates the comment from CIRNAC and assumes an update to management plans will be required following completion of the Water Licence Amendment to ensure all technical comments are captured appropriately. For this application (Operational Update, and plans to restart operations) refer to the Water and Load Balance Model (Appendix 4-F) and the Doris-Madrid Water Management Plan(Appendix 6-P).

Responses to Replies

CIRNAC reiterates its firm opinion that the existing Amendment and Renewal Application cannot be properly assessed without clarity on the Water Management Plan. As indicated in IR-17a through IR-17n, the existing Water Management Plan contains blatant contradictions within itself, and does not provide a clear picture of how water will be managed on site. The same contradictions exist between the Water Management Plan and the figures in the Water and Load Balance Model. These inconsistencies prevent CIRNAC from understanding flow paths, storage, treatment, and discharge points, and therefore from assessing potential effects on receiving waters.

While a finalized Water Management Plan may be submitted following licence issuance, CIRNAC strongly recommends that Agnico provide sufficient clarification at this stage to ensure that water management processes are internally consistent and reviewable.

CIRNAC insists that Agnico provide a reconciled description of water management processes and an updated flow diagram that are internally consistent and aligned across all referenced documents. The submitted reconciled document should be detailed enough to be used as a single authoritative version of the water management system.

18. Ice Road Construction

Comment:
Section 6-14 of the SIG asks Applicants to indicate the quantities of water required for ice road construction and provide a description of the methods of ice road construction. The Applicant has referred to block 13 of the Application Form to answer this question, but this section does not contain any reference to an ice road.

Section 3.3.8.1 of the Main Application indicates that the Applicant will use water from proximal sources to construct a winter ice road. No other information regarding the quantity of water required for ice road construction or the methods of ice road construction were found within the application package.

Recommendation:
IR-18) CIRNAC recommends that the Applicant clarify whether or not they intend to build ice roads as a part of this project. If so, CIRNAC recommends that the Applicant indicate the quantities of water required for ice road construction and provide a description of the methods of ice road construction, monitoring and safety.

Agnico Eagle's Response to Request:
Ice roads are not considered as part of this Amendment. However, Agnico Eagle is authorized under Part E, Item 1 to draw water for winter ice road construction. Details would be communicated to NWB should this be required.

Response to Reply:
Agnico's response to this request leaves ambiguity as to whether they intend to build ice roads under this license. CIRNAC requests that Agnico provide a clear statement on whether ice road construction is included within the scope of activities under this renewal and amendment application. CIRNAC does not consider deferring operational details to future communications appropriate at this stage of the application review.
If ice road construction may occur under existing authorization, CIRNAC recommends that Agnico provide expected water use quantities and construction methods for assessment purposes. Without clarity on potential ice road construction, CIRNAC

cannot fully assess water use demands and associated environmental effects during winter operations.

19. Water Storage Facilities

Comment:

CIRNAC noted a lack of information regarding existing water storage facilities. Since this is a renewal application and not just an amendment, information on all facilities should be provided. Of note:

a. Section 6-16 of the SIG requires Applicants to provide the water storage volume in cubic metres. CIRNAC was only able to locate the water storage volumes for the proposed Saline Pond 1 and CWP 4.
b. Section 6-17 of the SIG requires Applicants to indicate whether reservoirs are lined, the type of liner and when it was or will be installed. The design reports indicate that the new Saline Pond 1, CWP 4, and Sump 6A will be lined, including the type of liner. The Water Management Plan indicates the Doris Sedimentation Pond is lined, but does not indicate the type of liner or when it was installed. CIRNAC was unable to locate any other information regarding whether or not existing reservoirs are lined, what type of liner they contain, and when those liners were installed.
c. Section 6-18 of the SIG requires Applicants to indicate whether a storage reservoir is created in a natural channel. If applicable, it requires Applicants to provide plan and profile drawings of the reservoir including the size of the drainage basin upstream of the reservoir, topographical plan showing the drainage area boundary, number of hectares flooded, surface area of the reservoir at full capacity, storage capacity, and details of shoreline protection. Section 3.4 of the design reports for CWP4 and Saline Pond 1 indicate that they will be built within a natural drainage basin, but they do not indicate the drainage area boundary, the number of hectares flooded, the surface area of the reservoir at full capacity, or details of shoreline protection. None of the required information was provided for the other storage reservoirs at the project site.
d. Section 6-19 requires Applicants to provide a plan showing representative cross sections of the reservoir. CIRNAC found cross sections for the proposed CWP4 and Saline Pond 1, but not for any of the existing reservoirs.

Recommendation:

CIRNAC recommends that the Applicant provide the following information for all water reservoirs that are part of the project:

IR-19a) The water storage volume in cubic metres.

IR-19b) An indication of whether reservoirs are lined, the type of liner and when it was or will be installed.

IR-19c) An indication of whether existing storage reservoirs are in a natural channel. If applicable, provide plan and profile drawings of the reservoir including the size of the drainage basin upstream of the reservoir, topographical plan showing the drainage area boundary, number of hectares flooded, surface area of the reservoir at full capacity, storage capacity, and details of shoreline protection.

IR-19d) A plan showing representative cross sections of the reservoir.

Agnico Eagle's Response to Request:
It is assumed the reviewer is looking for information on the water ponds or sumps.

Response to bullet 19a)
See response to KitIA-IR-36 for a table of ponds and the maximum storage volumes.

Response to bullet 19b)
Contact Water Ponds are generally unlined ponds and utilize the permafrost and naturally low permeability of the foundation materials to contain contact water within the pond footprint. Contact Water Ponds intended for storage of saline water, and those located in areas where low-permeability materials are absent, will be designed with High Density Polyethylene HDPE geomembrane liner and a non-woven geotextile where applicable to provide protection from crushed rock. All materials used for earthworks are free from acid generation/metal leaching potential.

Response to bullet 19c and 19d)
This is a Water Licence Amendment application intended to describe the changes to infrastructure. This application is not a renewal of previously approved and constructed infrastructure. Drawings for SP1 and CPW4 were provided with the Application (Appendix 3-B and 3-C, respectively). Any future planned constructions for ponds will be provided as part of the 60-day notice of construction. Otherwise, all existing infrastructure have been assessed and approved.

Response to Replies
IR-19a)
CIRNAC thanks Agnico for its response.

IR-19b)
CIRNAC thanks Agnico for its response.

IR-19c)
As indicated in box 25 of the Application form, when asked "Is the Licensee applying for a combined renewal and amendment of the existing license?" Agnico indicated "Yes"

and proposed extending the end date to March 2048. Therefore, all parts of the existing project are subject to review during the amendment and renewal application. Previously approved status does not remove the requirement to provide updated and complete information for renewal assessment purposes.

CIRNAC repeats its request for the following information for each existing and proposed water storage reservoir, (i.e. water ponds) :

- Whether they exist in a natural channel.
- The size of the drainage basin upstream
- The number of hectares flooded
- The surface area of the reservoir at full capacity
- Shoreline protection details

Review of this information ensures that assumptions and conclusions reached during the previous license renewal are still valid given project updates and current water management best practices. Without this information, CIRNAC cannot complete its assessment of water storage infrastructure and associated water management risks.

IR-19d)

As indicated in box 25 of the Application form, when asked “Is the Licensee applying for a combined renewal and amendment of the existing license?” Agnico indicated “Yes” and proposed extending the end date to March 2048. Therefore, all parts of the existing project are subject to review during the amendment and renewal application. Previously approved status does not remove the requirement to provide updated and complete information for renewal assessment purposes.

CIRNAC repeats its request for plans showing representative cross sections of all existing and proposed water reservoirs (i.e. water ponds). Review of this information ensures that assumptions and conclusions reached during the previous license renewal are still valid given project updates and current water management best practices.

21. Watercourse Crossings

Comment:

Section 6-23 of the SIG requires Applicants to provide a description of any water course crossings including pipelines, bridges, culverts or roads and its purpose.

Section 6-24 requires Applicants to provide a plan of any watercourse crossing showing cross section and elevations.

CIRNAC noted multiple watercourse crossings within the project, but was not able to locate any detailed information or cross sections of watercourse crossings within the application package.

Recommendation:

IR-21) CIRNAC recommends that the Applicant provide a description of all watercourse crossings including pipelines, bridges, culverts or roads. CIRNAC recommends that the description include the water crossing's purpose and a cross section of the crossing including elevations.

Agnico Eagle's Response to Request:

As per the following excerpt of NWB Guidelines (Guide 4, Part 1, item 6):

The applicant should address the SIG to the best of their ability, recognizing that some of the information requested may not be relevant to the project under consideration. If specific information is requested by the SIG that does not relate to the project, the applicant is requested to indicate "N/A" (Not Applicable) in the concordance table and provide a justification.

Agnico Eagle notes that fields in the SIG (Appendix 1-B of the Application) were entered as "N/A" with description as "no change from current Licence". There are no new watercourse crossings (bridges or culverts) associated with the Operational Update; therefore, the SIG information is not relevant to the project under consideration.

Watercourse crossings (bridges and culverts) have been assessed through previous applications and are in place and/or have approval to be built. Where applicable, Agnico Eagle has gone through the appropriate channel with DFO for approvals. Should a bridge or culvert be required in the future, Agnico Eagle will provide the NWB with a 60-day notice per Part D, Item 1 of the Licence, as well as work with DFO where applicable.

Response to Replies:

As indicated in CIRNAC's reply to IR-03, CIRNAC does not feel that "No change from current License", "Current practices will be applied" or "No change from current Annual Reporting" is a valid justification to indicate a field is Not Applicable during a Renewal and Amendment Application review.

As indicated in box 25 of the Application form, when asked "Is the Licensee applying for a combined renewal and amendment of the existing license?" Agnico indicated "Yes" and proposed extending the end date to March 2048. Therefore, all parts of the existing project are subject to review during the amendment and renewal application. Previously approved status does not remove the requirement to provide updated and complete information for renewal assessment purposes.

CIRNAC therefore repeats its request that Agnico provide a description of all existing watercourse crossings including pipelines, bridges, culverts or roads. CIRNAC recommends that the description include the water crossing's purpose and a cross section of the crossing including elevations. This information will help CIRNAC assess the risks of sedimentation, erosion, and spills to the underlying watercourse, in conjunction with any proposed changes to the license. Without this information, CIRNAC will be unable to proceed with a complete technical review.

22. Watercourse Trainings

Comment:
Section 6-25 of the SIG requires Applicants to provide a description of any watercourse trainings including channel and bank alterations, culverts, spurs, erosion control, and artificial accretion, and its purpose. The Applicant indicated this section as Not Applicable, with the justification that there is no change from the current license. CIRNAC notes that this is a renewal application, not an amendment, so all aspects of the project should be reviewed.

Recommendation:
IR-22) CIRNAC recommends that the Applicant provide a description of any watercourse trainings including channel and bank alterations, culverts, spurs, erosion control, and artificial accretion, and its purpose.

Agnico Eagle's Response to Request:
Agnico Eagle notes that fields in the SIG (Appendix 1-B of the Application) were entered as "N/A" with description as "no change from current Licence". There are no changes to the category of effects (reduced streamflow) on watercourses associated with the Operational Update; therefore, the SIG information is not relevant to the project under

consideration. Slight changes to the amplitude of the streamflow effects are anticipated due to the requested water withdrawal volumes, as shown in Appendix 4-C and 6-Q

Regarding the comment that this is a renewal not an amendment – please refer to the cover letter.

Responses to Replies
CIRNAC would like to provide clarification that the final sentence should have read "CIRNAC notes that this is *also* a renewal application, not *just* an amendment, so all aspects of the project should be reviewed. "

As indicated in CIRNAC's reply to IR-03, CIRNAC does not feel that "No change from current License", "Current practices will be applied" or "No change from current Annual Reporting" is a valid justification to indicate a field is Not Applicable during a Renewal and Amendment Application review.

As indicated in box 25 of the Application form, when asked "Is the Licensee applying for a combined renewal and amendment of the existing license?" Agnico indicated "Yes" and proposed extending the end date to March 2048. Therefore, all parts of the existing project are subject to review during the amendment and renewal application. Previously approved status does not remove the requirement to provide updated and complete information for renewal assessment purposes.

CIRNAC therefore repeats its request that Agnico provide an inventory of any watercourse trainings including channel and bank alterations, culverts, spurs, erosion control, and artificial accretion, and its purpose. This request applies to physical watercourse interventions regardless of whether changes in effects are anticipated. Without this information, CIRNAC is of the opinion that the Application package cannot proceed to technical review.

23. Water Diversions

Comment:
Section 6-27 of the SIG requires Applicants to provide a description of any diversions including ditches and dikes and their purposes. The Applicant indicated this section as Not Applicable, with the justification that there is no change from the current license. CIRNAC notes that this is a renewal application, not an amendment, so all aspects of the project are subject to review.

Recommendation:
IR-23) CIRNAC recommends that the Applicant provide a description of any diversions including ditches and dikes and their purposes.

Agnico Eagle's Response to Request:

Agnico Eagle submitted a *water license amendment* application, not a license renewal application. All existing water management infrastructure have been vetted and reviewed by parties. All future planned construction for diversions, ditches, and/or dikes (if any) will go through the 60-day notice of construction review process. Detailed engineering drawings will be provided at that time.

Responses to Replies

As indicated in CIRNAC's reply to IR-03, CIRNAC does not feel that "No change from current License", "Current practices will be applied" or "No change from current Annual Reporting" is a valid justification to indicate a field is Not Applicable during a Renewal and Amendment Application review.

As indicated in box 25 of the Application form, when asked "Is the Licensee applying for a combined renewal and amendment of the existing license?" Agnico indicated "Yes" and proposed extending the end date to March 2048. Therefore, all parts of the existing project are subject to review during the amendment and renewal application. Previously approved status does not remove the requirement to provide updated and complete information for renewal assessment purposes.

An understanding of the location and purpose of ditches and dikes is essential to understanding the water management plan throughout the mine site, and CIRNAC cannot adequately assess the renewal if this information is not included.

CIRNAC therefore repeats its request that Agnico provide a description of any diversions including ditches and dikes and their purposes, and maintains that this Application should not proceed to technical review until this information has been provided.

24. Operations and Maintenance Plans

Comment:

Section 6-46g of the SIG requires Applicants to provide all plans relevant to the application, including operation and maintenance plans. The Applicant provided an operations and maintenance plan for the Doris TIA, but not for other important parts of the project.

Recommendation:

IR-24) CIRNAC recommends providing operation and maintenance plans for all major infrastructure associated with the project, including but not limited to the Milling and

Processing Plant, the RBDS Pumphouse, the Effluent Water Treatment Facility, the Landfarm, the Sewage Processing Plant, the Landfill, Doris Mine and Madrid Mine.

Agnico Eagle's Response to Request:
As per the response provided by Agnico Eagle in the SIG (Appendix 1-B of the Application), Agnico Eagle did provide the OMS available for the site.
Based on the other facilities listed by CIRNAC:
• Milling and Processing Plant: A new process plant is being designed and built as part of the Operational Update. No OMS exists; however, a Design Basis will be developed which will detail the whole process.
• RBDS Pumphouse: No OMS document for this facility.
• Effluent Water Treatment Facility: No OMS document for this facility.
• Landfarm: No OMS document for this facility; however, the Environment and E&I departments
are developing a standard operating procedure for this facility.
• Sewage Processing Plant: No OMS document for this facility; however, the Environment and E&I departments are developing a standard operating procedure for this facility.
• Landfill: No OMS document for this facility; however, the Environment and E&I departments will develop a standard operating procedure for this facility.
• Doris / Madrid Mines: No OMS document for this facility.

Response to Reply:
CIRNAC is satisfied with this response, but recommends that the new standard operating procedures for the Landfarm, Sewage Process Plant, and Landfill, all be submitted to the NWB for review within 60 days of issuing the License Amendment and Renewal.

25. Waste Generation: Quality and Quantity

Comment:
Section 7-2 of the SIG requires Applicants to provide the composition, chemical characteristics and quantity generated for each type of waste. CIRNAC noted the following missing information for the various waste streams:

a. Sewage: CIRNAC did not locate any information on the quantity of sewage generated.
b. Greywater: CIRNAC did not locate any information on quantity of greywater generated.

c. Non-hazardous solid waste: Table 4.1 of the document “260130 2AM-DOH1335_HopeBay-WLAmendment-App6-J_Non-hazardousWasteMgmtPlan_Jan2025_V2” (henceforth: Non-Hazardous Waste Plan) provides the various types of non-hazardous waste, but does not provide an estimate of the quantity generated.
d. Sludge: CIRNAC did not locate any information on the chemical characteristics or the quantity of sludge generated.
e. Hazardous waste: Table 4.1 of the document “260130 2AM-DOH1335_HopeBay-WLAmendment-App6-F_HazardousWasteMgmtPlan_Jan2026_V8” (henceforth: Hazardous Waste Plan) provides the various types of hazardous waste, but does not provide the chemical characteristics or an estimate of the quantity generated.
f. Contaminated soil, snow, ice and/or water: this category is include in table 4.1 of the Hazardous Waste Plan, but CIRNAC did not locate an estimate of the quantity generated.
g. Bulky items and scrap metal: this category is include in table 4.1 of the Non-Hazardous Waste Plan, but CIRNAC did not locate any information on chemical characteristics or an estimate of the quantity generated.

Recommendation:

IR-25) CIRNAC recommends that the Applicant provide the composition, chemical characteristics and quantity generated for all waste types produced as a part of this project. CIRNAC requests that these quantities take into account the projected increase in camp production and personnel under the Construction and Operational Phases.

Agnico Eagle’s Response to Request:

Additional details were provided in Block 15 of the Application Form. Where possible, Agnico Eagle can provide further information during the Technical Comment phase.

Response to Replies:

Block 15 of the Application Form provides estimates for the quantity of Waste Rock, Tailings, and Compost produced at site. Domestic waste (presumed to include greywater and non-hazardous solid waste), contaminated soil/snow, and overburden were all listed as “Will vary depending on stage of operations”. CIRNAC does not find this to be of sufficient detail, and requests, at minimum, that a range of likely quantities be generated for each type.

Block 15 section contains no information on the estimated quantity of sewage, hazardous waste, sludge, or bulky item and scrap metals waste. CIRNAC reiterates its request for an estimation of the quantity of waste generated for each of the listed types.

Additionally, Box 15 does not contain any information on the chemical characteristics of the sludge, hazardous waste, or bulky item waste, and CIRNAC did not find this

information throughout the rest of the application package. CIRNAC reiterates its request for chemical characteristics of sludge, hazardous waste, and bulky items, including key chemical constituents relevant to environmental risk (e.g., hydrocarbons, metals, nutrients, or other relevant contaminants).

CIRNAC believes that the completeness review is the appropriate avenue to address these information requests, not the technical review, since this information may influence the technical review.

27. Tailings Alternatives Assessment

Comment:
Section 7-9 of the SIG requires Applicants to provide an assessment of alternatives for any proposed tailings containment facility. The document "260130 2AM-DOH1335_ HopeBay-WLAmendment-App3-A_TIAFilteredTailingsPermittingConcepDesign" indicates that a Multiple Accounts Analysis was conducted by SRK in 2024, but this study has not been provided in the application package.

Recommendation:
IR-27) CIRNAC recommends that the Applicant provide the 2024 Multiple Accounts Analysis by SRK as a part of the amended application package.

Agnico Eagle's Response to Request:
Agnico Eagle confirms that a Multiple Accounts Analysis (MAA) was completed by SRK in 2024 to evaluate tailings management alternatives for the Hope Bay Project. The outcomes of this assessment informed the selection of the preferred tailings management approach (Option 11) that was submitted as *Appendix 3-A: Tailings Impoundment Area Filtered Tailings Conceptual Design Assessment*. The MAA was completed as an alternatives screening exercise to inform project decision-making, with the results summarized and carried forward into the application documentation prepared for regulatory review. The below summarizes the alternatives considered and the results, with drawings of each option provided in Attachment B.

Response to Reply:
CIRNAC thanks Agnico for the confirmation that the MAA was conducted, but continues to request that the analysis report be provided for review as a part of this amendment application. This will help CIRNAC review and assess the proposed changes to tailings management.

28. Discharge Criteria Rationale

Comment:
Section 7-12 of the SIG requires Applicants to clearly outline the proposed discharge criteria, how the criteria were developed, standards to be applied, and how these criteria will be used to prevent negative effects in the receiving environment.

Discharge criteria for the Sewage Treatment Plant, the CWPs sumps, the Landfill sumps, the Landfarm Sump, and the Fuel storage and Containment Facility Sumps are listed within License 2AM-DOH1335. However, CIRNAC was unable to locate any information in the application package regarding how these criteria were developed and how these criteria will be used to prevent ecological effects in the receiving environment.

Recommendation:
IR-28) CIRNAC recommends that the Applicant provide rationale for all discharge criteria applicable to the current license, including a description of how they were developed, what reference material was used in the development of the discharge criteria and how they will prevent negative effects to the receiving environment.

Agnico Eagle's Response to Request:
Agnico Eagle has not proposed any changes to discharge criteria in this Water Licence Amendment.

Responses to Replies:
Regardless of whether Agnico is proposing any changes to discharge criteria, all aspects of a project are subject to review during a renewal and amendment application. Understanding the rationale behind established discharge criteria is essential for understanding whether they still adequately protect freshwater sources at the time of review.

CIRNAC reiterates its request to provide rationale for all discharge criteria applicable to the current license, including a description of how they were developed, what reference material was used in the development of the discharge criteria and how they will prevent negative effects to the receiving environment.

29. Emergency Response and Spill Contingency Plans

Comment:
Section 7-22 of the SIG requires Applicants to ensure plan(s) address all phases of the project including construction, operation, and care & maintenance.

Section 1 of the document “260130 2AM-DOH1335_HopeBay-WLAmendment-App6-M_SpillContingencyPlan_V19_Jan2026” (henceforth: Spill Contingency Plan) indicates that the plan has been revised to reflect Care and Maintenance operations, and will be revised as required prior to returning to the Operations phase.

The Dam Emergency Plan is found in Appendix F of the document “260130 2AM-DOH1335_HopeBayWLAmendment-App6-N_DorisTIAOMSManual_Jan 2026_V9”. Section 1 of this document indicates that the current version reflects the current Care & Maintenance Phase for Hope Bay.

The document “260130 2AM-DOH1335_HopeBay-WLAmendment-App6-C_ERP_Jan2026_V7” (henceforth: Emergency Response Plan) does not appear to indicate whether which project phase it is intended to address.

The project is currently in Care & Maintenance, but the Applicant is proposing to re-enter Construction from 2027 to 2029, then conduct Operations from 2030 to 2043. CIRNAC is concerned that the plans will not be updated and submitted for review before the changes in operational phases.

Recommendation:

IR-29) CIRNAC recommends the Applicant amend The Spill Contingency Plan, the Dam Emergency Plan, and the Emergency Response Plan to address all phases of the project including construction, operation, and care & maintenance.

Agnico Eagle’s Response to Request:

The NWB can have surety that Plans will be updated (where applicable) to reflect the operational phase, either after the Water Licence Amendment approval, or 90-days prior to Operations.

Response to Replies

Agnico is applying to transition from care & maintenance to construction in 2027. Given the timeline of the Water License Amendment and Renewal Process, CIRNAC believes it is important to assess The Spill Contingency Plan, the Dam Emergency Plan, and the Emergency Response Plan as they will be implemented at the time that the License is issued.

CIRNAC reiterates its request that the Agnico amend its Spill Contingency Plan, Dam Emergency Plan, and Emergency Response Plan to address all phases of the project including construction, operation, and care & maintenance.

31. Sampling Personnel

Comment:

Section 8-2 of the SIG requires Applicants to indicate who is responsible for sampling including that person's position, contact information and level of training. CIRNAC was able to locate the following information:

a. The environmental supervisor and consultants are responsible for conducting AEMP sampling.
b. The environmental superintendent is responsible for
   - Collecting water quality samples from sumps, backfilled stopes and the Water Treatment Plant during periods of discharge.
   - Conducting or facilitating the seep sampling program.
   - Monitoring water quality in the ponds, TIA and discharge points.

CIRNAC was unable to locate the contact information or level of training for the environmental supervisor or environmental superintendent.

Recommendation:

IR-31) CIRNAC recommends providing the contact information and level of training for the environmental supervisor, the environmental superintendent, and any other personnel responsible for sampling.

Agnico Eagle's Response to Request:

As per the following excerpts of NWB Guidelines (Guide 4, Part 1, item 6):

The applicant should address the SIG to the best of their ability, recognizing that some of the information requested may not be relevant to the project under consideration. …

… Applicants must decide what level of detail is required in responding to the SIG, while realizing that if the NWB determines that information is lacking, the NWB may request additional information.

While Agnico Eagle notes that field 8-g of the SIG was inadvertently excluded from Appendix 1-B of the Application the information is not relevant (e.g., level of training) to the project under consideration (i.e., the Operational Update Water Licence Amendment). Hope Bay is not a new site or a new operation.

CIRNAC should have confidence in the level of training of our employees and the understanding that contact information is shared on-site.

Response to Reply
An understanding of the training and qualifications of personnel responsible for sampling is a fundamental quality assurance and quality control consideration during a licence renewal and amendment review. Without confirmation from Agnico, CIRNAC cannot assess whether sampling is being conducted by suitably trained personnel or whether there is a shared understanding of the minimum competencies required to support reliable data collection. Given that human error is a common source of sample contamination and data variability, this information remains relevant to the review.

CIRNAC reiterates its recommendation that Agnico provide information on the level of training and qualifications for the environmental supervisor, environmental superintendent, and any other personnel responsible for sampling activities.

33. Expected Water Quality and Quantity

Comment:
Section 8-6 of the SIG requires Applicants to provide a summary table of the expected quality and quantity of waters, over time in all sumps, monitoring stations, and discharge points, along with i) if applicable, adaptive management criteria to benchmark if mitigation/contingency are to be implemented, ii) if applicable, water quality criteria, and iii) management action.

The Water and Load Balance Model provides expected end-of-pipe water quality and quantity into Roberts Bay, and the Water Management Plan provides discharge criteria for tundra discharges. CIRNAC was unable to locate information on the expected quantity of water over time at tundra discharge points. CIRNAC was also unable to locate a summary of expected quality and quantity of waters over time in sumps or monitoring stations.

CIRNAC is concerned that without water quality and quantity estimates, adaptive management criteria and water quality criteria, the Applicant will not catch early warning signs of water management issues.

Recommendation:
IR-33) CIRNAC recommends that the Applicant provide a summary table of the expected quality and quantity of waters, over time in all sumps, monitoring stations, and discharge points (including tundra discharge points), along with i) if applicable, adaptive management criteria to benchmark if mitigation/contingency are to be implemented, ii) if applicable, water quality criteria, and iii) management action.

Agnico Eagle's Response to Request:
The framework of the water and load balance model depicts water management through the Hope Bay mine site during different stages of development (see the process flow diagrams; Appendix 4-F, Appendix A, Figures 1 to 3). The prediction nodes are provided in the process flow diagram and summarized in the table below.)

Table CIRNAC-2: Summary of all predictive nodes in the Water and Load Balance (see 260409 2AM-DOH1335-Amendment Completeness Check - Agnico Eagle Response to IRs-ILAE)

The water and load balance model developed water quality predictions for saline and contact water for discharge to the environment. The water quality criteria used to evaluate the model were the Water Licence discharge criteria and the MDMER. Discharge to the environment is stopped if licence limits are not met.

Agnico Eagle follows the procedures outlined in the Doris-Madrid Water Management Plan (Appendix 6-P) to monitor water quality. The results of the monitoring program are provided in the annual report mitigation plans, if necessary, is described.

Response to Replies
Agnico has not provided the requested information regarding the expected quality and quantity of waters over time in all sumps, monitoring stations, and discharge points (including tundra discharge points), adaptive management criteria, or management action. Understanding the predicted values are essential for assessing whether water management systems are performing as designed.

The monitoring program outlines in Appendix 6-P does not describe adaptive management criteria or management actions designed to prevent unauthorized discharges.

CIRNAC reiterates its request that Agnico provide a summary table of the expected quality and quantity of waters, over time in all sumps, monitoring stations, and discharge points (including tundra discharge points), along with i) if applicable, adaptive management criteria to benchmark if mitigation/contingency are to be implemented, ii) if applicable, management action.

34. Proposed Water Works

Comment:
The Applicant has provided two design reports as a part of the renewal and amendment application: one for CWP 4 and another for Saline Pond 1. Section 6a-35 of the SIG requires Applicants to provide detailed design plans for all proposed water works, and

includes a list of design plan requirements. The Applicant has provided design reports for both proposed works, but CIRNAC notes the following missing information:

a. No explanation of the rationale for the selected design flow flood and its return period was provided for either design report (requirement 6a-35f)
b. The design reports do not include tentative start and completion dates for construction (requirement 6a-35j).
c. The sedimentation and erosion measures listed in section 5.2 of the water Management Plan lack specificity, and have not been applied to either design report (requirement 6a-35p).
d. No construction monitoring plans were included for either report (requirement 6a-35q).
e. Post construction monitoring plans have not been provided (requirement 6a-35x).

Recommendation:

IR-34a) CIRNAC recommends that the Applicant provide rationale for the design flow flood chosen.

IR-34b) CIRNAC recommends the Applicant indicate a tentative start and completion date for each proposed work.

IR-34c) CIRNAC recommends the Applicant provide detailed sedimentation and erosion measures to be used for each proposed work.

IR-34d) CIRNAC recommends the Applicant provide construction monitoring plans.

IR-34e) CIRNAC recommends the Applicant suggest post construction monitoring plans for each proposed work.

Agnico Eagle's Response to Request:

Agnico Eagle notes that the design reports provided in the Application (Appendix 3-B and Appendix 3-C) followed the Conditions of the Licence (per Schedule D, Part 1) and not all the points listed above are required.

Response to bullet 34a)

CWP4 was designed to contain the 1:100 yr 24-hour rain event plus the average snow melt (per Agnico Eagle design basis), assuming no loss (100% runoff). Saline Pond 1 was sized to manage its catchment area plus contingency volume for the SETP shutdown and high flow contingency (per Agnico Eagle design basis).

Response to bullet 34b)

Construction of CWP4 and Saline Pond 1 will be initiated after approval of the Water Licence Amendment. Following completion of construction per facility, Agnico Eagle will provide a Construction Summary Report following the Conditions of the Licence (Schedule D, Part 2).

Response to bullet 34c)

As outlined in the Water Management Plan, effective erosion and sediment control measures will be installed prior to construction work commencing to minimize the potential for the introduction of sediment into watercourse or waterbodies. An adequate supply of erosion and sediment control contingency supplies will be maintained at the site, including silt fence, tarps, polly sheeting, sandbags, hand tools, geotextile erosion control matting (with anchors), and trash pumps (with suitable lengths of hose).

Response to bullet 34d) and 34e)

As per Schedule D of the 2AM-DOH Licence, this is not a requirement. Agnico Eagle provided information in the report based on the conditions of the current Licence.

Response to Replies

IR-34a)

CIRNAC thanks Agnico for their response.

IR-34b)

CIRNAC thanks Agnico for their response.

IR-34c)

CIRNAC thanks Agnico for their response.

IR-34d)

Regardless of whether the information was required under the Conditions of the License, CIRNAC is requesting information on construction monitoring plans as per 6a-35q of the SIG. Construction monitoring is an important part of QA/QC and ensuring the protection of nearby freshwater sources.

IR25-e)

Regardless of whether the information was required under the Conditions of the License, CIRNAC is requesting information on post-construction monitoring plans as per 6a-35x of the SIG. Post-construction monitoring is an important part of QA/QC and ensuring the protection of nearby freshwater sources.

37. Water from Proximal Sources

Comment:

In the section 3.3.8.1 of the Main Application and Block 13 of the Application Form, the Applicant requests authorization to 60,000 m³/year of freshwater from “proximal

sources" for activities such as winter ice road construction. However, the application does not specify which lakes or waterbodies constitute these proximal sources, nor indicate how the Applicant will ensure withdrawals do not negatively affect these water sources. CIRNAC is concerned that without specified guidelines and limitations, withdrawals from these proximal sources could result in negative environmental impacts.

Recommendation:

IR-37a) CIRNAC recommends that Agnico provide a detailed list of proposed proximal sources, a map of the sources, and volume measurements of each source to ensure none of these sources are drawn down during periods of operation in winter conditions under ice.

IR-37b) CIRNAC recommends that Agnico clarify what measures it will take to minimize the impacts of withdrawals from 'proximal sources' on water levels and flow rates.

Agnico Eagle's Response to Request:

The withdrawal of water from proximal sources is an existing Condition of the Licence (as amended in 2018 Water Licence Amendment 2).

As per the 2AM-DOH1335 Licence (Part E, Item 1):

The Licensee shall obtain fresh Water for domestic camp use from Windy Lake designated using the designated fresh Water Intake at Monitoring Program Station ST-7a, with the volume not exceeding forty-three thousand eight hundred (43,800) cubic metres per year. The Licensee shall obtain fresh Water for mining, milling, and associated industrial uses from Doris Lake using the designated fresh Water Intake at Monitoring Program Station ST-7, with the volume not exceeding one million nine hundred thirty thousand (1,930,000) cubic metres per year. Drill Water may also be obtained from locations proximal to the drilling targets. Water for winter ice road construction may be obtained from proximal sources and shall not exceed sixty thousand (60,000) cubic metres per year. The total volume of Water use from all sources and for all purposes shall not exceed two million thirty-three thousand eight hundred (2,033,800) cubic metres per year.

Sources would have to be within the project extents listed in Part A, Item 1 of the Licence. Agnico Eagle reports with withdrawal use through its Annual Report.

Response to Replies:

CIRNAC is concerned about the potential impacts of 60,000 cubic metres of water being withdrawn from unassessed sources each year, especially when Agnico has not indicated what measures are put in place to protect these proximal sources. CIRNAC firmly believes that this should be reviewed as a part of the amendment and renewal application.

CIRNAC therefore reiterates its requests for (a) a detailed list of proposed proximal sources, a map of the sources, and volume measurements of each source to ensure none of these sources are drawn down during periods of operation in winter conditions under ice and (b) information on what measures it will take to minimize the impacts of withdrawals from 'proximal sources' on water levels and flow rates.

39. Quarry 2 Landfill

Comment:

Section 5.1 of the Non-Hazardous Waste Plan indicates plans to construct a landfill within Quarry 2 at Doris. This request was not included within the Evaluation of Change or the Main Application document.

Section 3.3.12.1 of the Main Application indicates that waste generated on-site will continue to be disposed of in the landfill located in Quarry 2. This implies that the landfill has already been built and is operational. CIRNAC was unable to locate construction notices or as-built construction plans for the landfill within the NWB registry.

CIRNAC is unclear as to whether the landfill at Quarry 2 was already built, or whether this is a part of the current amendment application.

Recommendation:

IR-39) CIRNAC recommends that the Applicant clarify whether the landfill at Quarry 2 is already operational, or whether it is being requested as part of the current renewal and amendment application. If it is part of the amendment request, CIRNAC recommends that Applicant provide:

- an anticipated construction timeline
- clarification on whether it is expected to be in service before the mine re-enters Operations.
- The necessary geotechnical information required to approve a Quarry for use as a landfill.

Agnico Eagle's Response to Request:

In January 2025, documentation was provided to the NWB regarding the landfill in Quarry 2, which included an update to the Non-hazardous Waste Management Plan. A review process was done at that time. The landfill would be utilized as part of the Operational Update; however, is not a new scope activity to this Water Licence Amendment and is already approved.

Response to Reply:

CIRNAC remains unable to locate the referenced documentation regarding the landfill in Quarry 2, and requests that Agnico provide this documentation to CIRNAC for review.