



Water Resources Division
Resource Management Directorate
Nunavut Regional Office
P.O. Box 100
Iqaluit, NU, X0A 0H0

Your file - Votre référence
2AM-DOH1335
Our file - Notre référence
GCDOCS#104707543

August 08, 2022

Richard Dwyer
Manager of Licensing
Nunavut Water Board
P.O. Box 119
Gjoa Haven, NU, X0B 1J0
E-mail: licensing@nwb-oen.ca

**Re: Crown-Indigenous Relations and Northern Affairs Canada's Comments on
Agnico Eagles Mines Ltd.'s Response to Comments on the Hope Bay Project's
Care and Maintenance Plan, Type A Water License No. 2AM-DOH1335**

Dear Richard,

Thank you for the August 2, 2022 invitation to review the response to Crown-Indigenous Relations and Northern Affairs Canada's (CIRNAC) comments and recommendations, submitted by Agnico Eagle, for Type A Water Licence No. 2AM-DOH1335.

CIRNAC examined the responses provided and has the following comments.

If there are any questions or concerns, please contact me at (867) 975-3877 or Joyce.Demers@rcaanc-cirnac.gc.ca or Andrew Keim at (867) 975-4550 or Andrew.Keim@rcaanc-cirnac.gc.ca.

Sincerely,

Joyce Demers, B.Sc.,
Industrial Coordinator



CIRNAC Recommendation – 01:

CIRNAC recommends that Agnico Eagle Mines Limited (AEM) clarify whether the scheduled timeline for the installation of the water treatment plant (WTP) needs to be extended to include for construction of the WTP or if the scheduled “commissioning” period as shown in Figure 5.1 includes the construction/installation of the WTP north of the tailings impound area (TIA).

AEM’s Response to Recommendation:

Figure 5-1 will be revised to indicate that the Water Treatment Plant (WTP) will be constructed and installed in the fourth quarter of 2022. The WTP commissioning is now anticipated to occur prior to freshet 2023.

CIRNAC Response:

CIRNAC is satisfied with the response from AEM.

CIRNAC Recommendation – 02:

CIRNAC (R-02) recommends that AEM provide brief descriptions of actions to be undertaken to address the requirements outlined in Tables 1-2 and 1-3 of the care and maintenance plan (C&MP) that are yet to be completed.

AEM’s Response to Recommendation:

Table 1-2 and Table 1-3 will be revised to indicate dates of completion and/or dates to be completed and/or actions to address the requirement.

Table 1-2: Water Licence Requirements for Care and Maintenance (Revised)

Condition	Timeframe	Requirement	Status
Part J Item 4 (Type A Water Licence 2AM- DOH1335)	At least sixty (60) days prior to, or as soon as practically possible.	Notify in writing Agnico Eagle’s intention to enter into a Care and Maintenance Phase.	Completed March 30, 2022
Part J Item 5 (Type A Water Licence 2AM- DOH1335)	Within thirty (30) days of Agnico Eagle providing notice of intent to enter into Care and Maintenance.	Submit a Care and Maintenance Plan that details Agnico Eagle’s plans for maintaining compliance with the Terms and	Completed with this submission



		Conditions of applicable water licenses.	
Part J Item 6 (Type A Water Licence 2AM-DOH1335)	Within twelve (12) months of Agnico Eagle providing notice of intent to enter into Care and Maintenance.	Should the Project remain, or be in Care and Maintenance, submit the NWB an updated estimate of total mine closure restoration liability, and continue to do so every three (3) years thereafter.	To be provided with the Hope Bay Project Doris and Madrid Closure Plan in February 2023
Part H Item 6 (Type A Water Licence 2AM-DOH1335)	Within ninety (90) days of providing notice of intent to enter into Care and Maintenance.	Agnico Eagle will submit to the NWB for approval in writing, an addendum to the Emergency Response Plans and Spill Contingency Plan, detailing the changes in operations, personnel, responsibilities, availability of equipment and access to the site for assistance.	The Hope Bay Project Spill Contingency Plan and Emergency Response Plan were revised to reflect the Care and Maintenance phase of the project. The revised plans were submitted to the Nunavut Water Board on June 28, 2022.
Part C Item 4 (Type B Water Licence 2BB-MAE1727)	Within six (6) months of entering into Care and Maintenance.	Upon the Project entering into or being in Care and Maintenance, the Licensee shall submit to the Board for approval in writing, an updated estimate of total mine closure restoration liability, as above,	A letter indicating changes to the total mine closure restoration liability occurring during the Care and Maintenance period, if applicable, will be submitted September 2022.



		and every three (3) years thereafter.	
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Table 1-3: Project Certificate Requirements – Care and Maintenance (Revised)

Condition	Timeframe	Requirement	Status
Term and Condition No. 35	Within six (6) months of Agnico Eagle providing notice of intent to enter into Care and Maintenance.	In collaboration with the Hope Bay Socio-Economic Working Group submit an updated Hope Bay Socio- Economic Monitoring Plan to the Kitikmeot Socio-Economic Monitoring Committee that will also include detail regarding specific measures that may mitigate the potential for negative effects as a result of the Project's temporary or permanent closure.	The Hope Bay Project Socio- Economic Monitoring Plan will be revised to address effects as result of the care and maintenance period. The revised plan will be provided in September 2022.
Term and Condition No. 36	Within six (6) months of Agnico Eagle providing notice of intent to enter into Care and Maintenance.	Agnico Eagle shall, submit an updated Human Resources Plan and Wellness Strategy for the Project that includes a Workforce Transition Strategy designed to mitigate the potential negative effects of Project closure on the affected communities of Nunavut.	The Hope Bay Project Human Resources Plan and Wellness Strategy will be revised to address effects as a result of the care and maintenance period. The revised plan will be provide in September 2022.



CIRNAC Response:

CIRNAC is satisfied with the response from AEM.

CIRNAC Recommendation – 03:

- Revise Section 3.6 of the Operations, Maintenance and Surveillance Manual;
- Revise Hope Bay Doris Tailings Impoundment Area Manual to clearly reflect the actions related to the TIA as outlined in the Care and Maintenance; and
- Review the C&MP and TIA plan to ensure that they are consistent in all aspects for activities related to the care and maintenance period.

AEM's Response to Recommendation:

With submission of the Hope Bay Project 2022 Annual Report (in April 2023) the following will be provided:

- An update to Section 3.6 of the Operations, Maintenance, and Surveillance Manual: Hope Bay Doris Tailings Impoundment Area to include the spillway an interim dike as discussed in the Care and Maintenance Plan
- An updated Operations, Maintenance, and Surveillance Manual: Hope Bay Doris Tailings Impoundment Area to include the water treatment plant installed North of the Tailings Impoundment Area and commissioned for use in 2023.

CIRNAC Response:

CIRNAC is satisfied with AEM's commitment to update the Operations, Maintenance, and Surveillance Manual to include the water treatment plant at the Hope Bay Doris Tailings Impoundment Area.

CIRNAC is satisfied with AEM's commitment to update the Operations, Maintenance, and Surveillance Manual to include the interim dike.

CIRNAC Recommendation – 04:

CIRNAC recommends that AEM clarify the changes made to the management plans in relation to the care and maintenance status of the site.

AEM's Response to Recommendation:

Management plans that were updated in relation to the care and maintenance status of the site detail the changes made since the last iteration and are summarized below.



Hope Bay Project Emergency Response Plan (June 28, 2022): The entire plan was revised to reflect Hope Bay's 2022 exploration focus and alignment with look and feel of Nunavut division sites.

Hope Bay Project Spill Contingency Plan (June 28, 2022): The entire plan was revised to reflect the decision made by Agnico Eagle Mines Limited to place Doris Mill into Care and Maintenance and suspend production of the Project. Section 1.5.1 details activities to be implemented during Care and Maintenance.

Hope Bay Project Doris-Madrid Water Management Plan (April 29, 2022): The following sections were updated with respect to water management with the initiation of care and maintenance: Section 3.1.3 (Mine Water), Section 3.2.7 (Water Treatment Plant), Section 4.1.1 (Non-Contact Water), Section 4.1.3 (Mine Water), and Section 4.2.2 (Madrid Contact Water Pond Sumps).

Hope Bay Project, Phase2 Doris Tailings Impoundment Area – Operations, Maintenance, and Surveillance Manual (April 29, 2022): Section 3.6 was updated to include the interim dike (i.e., alternative use of a water retaining dam used to segregate waste streams and managing water quality within the Tailings Impoundment Area) and the construction of the spillway with updates to the inflow design flood requirements.

Hope Bay Project Explosives Management Plan (April 29, 2022): The plan was revised to incorporate activities implemented by Agnico Eagle Mines Limited through Care and Maintenance. There were no major changes to explosive management.

CIRNAC Response:

CIRNAC is satisfied with the response from AEM.