



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# 148843124

July 28, 2026

Robert Hunter
Licensing Administrator
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 Review of the Design Report for the Hope Bay Project, Type A Water Licence No. 2AM-DOH1335.

Dear Robert,

Thank you for the June 23 invitation to review the referenced Design Report, submitted by Agnico Eagle Limited, for Type A Water Licence No. 2AM-DOH1335.

Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC) examined 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* and provides the following Technical Review Memorandum for the Board's consideration.

If there are any questions or concerns, please contact me at (873) 800-5240 or Pauline.Firmin@rcaanc-cirnac.gc.ca or Andrew Keim at (867) 975-4550 or Andrew.Keim@rcaanc-cirnac.gc.ca.

Sincerely,

Pauline Firmin

Pauline Firmin, M. Sc,
Regional Coordinator

Technical Review Memorandum

Date: July 28, 2026

To: Robert Hunter - Licensing Administrator, Nunavut Water Board

From: Pauline Firmin– Regional Coordinator, CIRNAC

Subject: Crown-Indigenous Relations and Northern Affairs Canada's Review of the Design Report for the Hope Bay Project, Type A Water Licence No. 2AM-DOH1335.

Region: ☒ Kitikmeot ☐ Kivalliq ☐ Qikiqtani

A. BACKGROUND

The Doris-Madrid Project, operated by Agnico Eagle Mines Limited (formerly licensed under TMAC Resources Inc.), is located in the Kitikmeot Region of Nunavut, approximately 125 km southwest of Cambridge Bay. The project encompasses the Doris, Madrid, and Boston gold deposits within the Hope Bay greenstone belt and is currently regulated under Water Licence No. 2AM-DOH1335 issued by the Nunavut Water Board. The licence authorizes, among other activities, the use of water from Windy Lake for domestic purposes and forms an integral part of the additional water requested in the current Water License Amendment process.

This Design Report propose the construction of a new freshwater intake, pumping station, and approximately 6 km of associated pipelines at the north end of Windy Lake. The infrastructure is intended to replace water trucking operations by conveying raw water directly from Windy Lake to the potable water treatment plant at Doris Camp. The proposed system includes a lake intake equipped with fish screens, a shore-based pumping station, submerged and above-ground insulated pipelines, and associated electrical and control infrastructure.

According to the report, the existing freshwater intake and diesel-powered pumping system currently operating at the south end of Windy Lake will be decommissioned. The new intake has been proposed to support current domestic water requirements and potential future increases in demand, subject to regulatory approval, while improving operational efficiency and reliability.

CIRNAC provides the following comments and recommendations pertaining to the application package. A summary of the subjects of recommendations can be found in Table 1. Documents reviewed as part of this submission can be found in Table 2 of Section B. Detailed technical review comments can be found in Section C.

Table 1: Summary of Recommendations

Recommendation Number	Subject
R-01	Construction Activities Near Or In Windy Lake
R-02	Water Returned To Source
R-03	Pipeline Route
R-04	Construction Quality Control/ Quality Assurance Program

B. DOCUMENTS REVIEWED AND REFERENCED

The following table (Table 2) provides a list of the documents reviewed under the submission and reference during the review.

Table 2: Documents Reviewed and Referenced

Document Title	Author, File No., Rev., Date
DESIGN REPORT - Fresh Water Intake, Pumping Station and Pipelines at Windy Lake North	AtkinsRéalis, June 18, 2026
Nunavut Water Board Amended Water Licence No: 2AM-DOH1335	TMAC Resources Inc., 2018

C. RESULTS OF REVIEW

1. Construction Activities Near Or In Windy Lake

Comment:

CIRNAC notes that construction activities associated with the proposed freshwater intake will need to occur in close proximity to or in Windy Lake. Section 6.1 of the Design Report indicates that a construction/operations pad will be established within approximately 15 m of the shoreline, and the pumping station will also be located near the lake.

Ensuring that proper measures are followed to be protective of the water body is important, given that construction of the intake infrastructure will occur in or closer than 31 m from Windy Lake. Additional risks may be present during construction due to the proximity, which could result in negative impacts to freshwater.

CIRNAC further notes that the Design Report provides limited information regarding erosion and sediment control measures, shoreline stabilization measures, and the management of potentially contaminated water during construction. The Water Licence requires the implementation of sediment and erosion control measures to prevent the entry of sediment into waters and the submission of technical specifications for sedimentation, erosion control, and bank stabilization measures as part of the design documentation. (Water Licence 2AM-DOH1335, Part D, Item 6; Schedule D, Item 1(e)).

Recommendation:

(R-01) CIRNAC recommends that the Proponent provide additional information regarding the following:

- a) The erosion and sediment control measures that will be implemented during construction and operation of the intake, pumping station and construction/operations pad to prevent sediment mobilization into Windy Lake;
- b) Any shoreline stabilization, bank protection, or erosion protection measures proposed for the intake area and associated infrastructure;
- c) Measures that will be used to minimize potential water quality impacts during construction activities occurring near or in water; and
- d) How any potentially contaminated water generated during construction (e.g., runoff, dewatering water, or water affected by equipment operation and material handling) will be contained, managed, and, if applicable, treated prior to release to the environment.

The above are to be provided prior to any site work being implemented by the proponent.

2. Water Returned To Source

Comment:

CIRNAC notes that Section 5.1.1 of the Design Report states that the volume of water contained within the pipeline exceeds the storage capacity of the raw water tank and, as a result, the system has been designed to allow water to be returned to Windy Lake during pigging and pipeline draining operations by using a foam pig to push water back toward the lake. The report also indicates that a dedicated discharge outlet to Windy Lake has been incorporated into the system for this purpose (Design Report, Section 5.1.1).

CIRNAC notes that the return of withdrawn water to the source lake may present potential water quality concerns if the water quality has changed during conveyance through the system, if the water underwent treatment, such as heating or chemical treatment, or if the discharge causes localized erosion, scour, or sediment mobilization at the discharge location.

CIRNAC was unable to identify a licence condition within Water Licence 2AM-DOH1335 that explicitly contemplates or authorizes the return of water to Windy Lake through this operational process. The licence does not appear to specifically address the return of water to the source lake during operation or maintenance activities of the water withdrawal infrastructure (Water Licence 2AM-DOH1335).

Recommendation:

(R-02) CIRNAC recommends that the Proponent clarify:

- a) Whether the return of water to Windy Lake during operations is planned in the existing water management plans and authorized under the current licence conditions;
- b) Whether there is any potential for contamination of the water during extraction, conveyance, storage, or pigging operations;
- c) Whether the water returned to Windy Lake would be returned untreated or post-treatment, such as heated or chemically treated water;
- d) Whether the volumes and frequency of return-water discharges to Windy Lake would be recorded and considered when calculating the total volume of water use from Windy Lake; and
- e) Whether the potential for localized erosion, sediment mobilization, scour, or other physical impacts to the lakebed or shoreline at the proposed discharge location has been evaluated, and if so, if there is a potential for disruption and if mitigation measures may be used.

3. Pipeline Route

Comment:

CIRNAC notes that Section 5 of the Design Report indicates that approximately 6,023 m of above-ground pipeline will be installed along the D10 (Doris-Windy Lake) road and the M16 access road. However, the report does not clearly confirm whether the entire pipeline will be located within previously disturbed areas associated with existing road infrastructure or whether any portions of the pipeline will require disturbance of undisturbed tundra. (Design Report, Sections 5).

CIRNAC notes that construction and operation of pipelines outside previously disturbed areas may result in localized impacts to terrain, vegetation, surface drainage, permafrost, and water resources if not appropriately managed. The Water Licence also requires the Licensee to minimize disturbance to terrain, permafrost, and drainage during construction activities. (Water Licence 2AM-DOH1335, Part D, Item 13).

Recommendation:

(R-03) CIRNAC recommends that the proponent clarify whether the entire pipeline will be constructed and operated within previously disturbed areas associated with existing roads and infrastructure and if disturbance outside existing developed areas is anticipated, what measures will be put in place to minimize potential effects on terrain stability, permafrost, surface drainage, and adjacent water resources during construction and operation.

4. Construction Quality Control/ Quality Assurance Program

Comment:

CIRNAC notes that the Design Report states that a *“quality control/quality assurance (QA/QC) program will be implemented during construction of all infrastructure components to ensure that construction-sensitive aspects of the design are properly executed.”* However, the report does not provide details regarding the proposed QA/QC program, nor does it reference an existing management plan or procedure where this information can be found. (Design Report, Section 6.5).

CIRNAC further notes that robust QA/QC procedures are particularly important for this project given that construction of the intake infrastructure will occur in and adjacent to Windy Lake, where potential risks present during construction could result in negative impacts to freshwater.

CIRNAC further notes that Water Licence 2AM-DOH1335 requires that the detailed report submitted 60 days prior to construction include QA/QC measures to be used and that

engineered structures be constructed under appropriate engineering supervision and field checks. (Water Licence 2AM-DOH1335, Part D, Item 10; Schedule D, Item 1(d)).

Recommendation:

(R-04) CIRNAC recommends that the Proponent provide additional information regarding the QA/QC program that will be implemented for construction of the freshwater intake, pumping station, pipeline, and associated infrastructure, including:

- a) Whether construction will be carried out under an existing approved QA/QC Plan or a project-specific QA/QC program;
- b) QA/QC measures related to protection of freshwater during construction, including implementation of erosion and sediment control measures, management of construction runoff, and protection of Windy Lake and adjacent water resources; and
- c) How QA/QC activities will verify that water management and freshwater protection measures are functioning as intended throughout construction.

The above are to be provided prior to any site work being implemented by the proponent.