



July 22, 2026

Robert Hunter
Nunavut Water Board
PO Box 119
Gjoa Haven, NU
X0B 1J0

Re: Response to Comments Design Report for Roberts Bay Fuel Tank Farm, Type A Water Licence No. 2AM-DOH1335

Dear Mr. Hunter,

Agnico Eagle thanks the Nunavut Water Board for the opportunity to respond to comments received regarding the Roberts Bay Fuel Tank Farm Design Report Application for Hope Bay, Type A Water Licence No. 2AM-DOH1335. Our comments are provided in the enclosed.

Should you have any questions or require further information, please contact the undersigned at your convenience.

Sincerely,



Jennifer Range | Permitting General Supervisor

jennifer.range@agnicoeagle.com |

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ENVIRONMENT AND CLIMATE CHANGE CANADA (ECCC)

Interested Party:	ECCC	Rec No.:	ECCC-1
Re:	Permafrost Considerations and Long-Term Stability		

Request Made by Interested Party:

ECCC recommends that the Proponent:

- *Provide a site-specific permafrost assessment, including ground ice content, active layer thickness, and anticipated changes under current and future climate conditions;*
- *Demonstrate how permafrost-related risks (e.g., thaw settlement, frost heave, differential movement) have been incorporated into the design of tank foundations, containment berms, and liner systems;*
- *Describe any mitigation or adaptation measures (e.g., thermal management, insulation layers, foundation design modifications) that will be implemented to maintain structural integrity and containment performance over the life of the project.*

Agnico Eagle's Response to Request:

Response bullet 1) and 2):

A site-specific assessment of permafrost conditions was completed as part of the 2017 Final Environmental Impact Statement, including considerations for future climate conditions (TMAC, 2017). The assessment identified permafrost extending to approximately 570 m depth, with an active layer thickness in overburden soils ranging from approximately 0.5 m to 1.4 m. However, as described in Section 8 of the Design Report and illustrated in Appendix A (Drawing 2), the Roberts Bay Tank Farm will primarily be located on competent mafic volcanic bedrock. As a result, the seasonal thawing and freezing of the overburden active layer is expected to have limited influence on foundation performance. The tank and containment systems have also been designed in accordance with applicable codes and design standards (Section 3, Design Report), supporting the long-term integrity and performance of the facility, including consideration for permafrost-related risks.

Response bullet 3):

Routine geotechnical and infrastructure inspections will continue throughout the life of the project. Should any signs of settlement, erosion, or other performance concerns be identified, appropriate mitigation and adaptive management measures will be implemented to maintain the structural integrity and containment performance of the facility. This will also be summarized in the annual geotechnical inspection report.

References:

TMAC. 2017. Hope Bay Project Geotechnical Design Parameters and Overburden Summary Report, November 2017. Available on the NWB Registry: <https://public.nwb-oen.ca/registry/2%20MINING%20MILLING/2A/2AM%20-%20Mining/2AM-DOH1335%20AEM/1%20APPLICATION/2017%20Amendment%20No.%202%20-%20Annexe%20V.1-7/Package%205/171220%202AM-DOH1323%20P5-5%20Hope%20Bay%20Project,%20Geotechnical%20Design%20Parameters%20and%20Overburden%20Summary-ILAE.pdf>