



You 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# 134135460

March 6, 2025

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
Licence Construction Notice for the Doris Pad U and Contact Water Pond
Application for the Hope Bay Project, Type A Water Licence No. 2AM-DOH1335**

Dear Robert,

Thank you for the February 13, 2025 invitation to review the referenced licence construction notice application, submitted by SRK Consulting Canada Inc on behalf of Angico Eagle Mines 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*. Please find CIRNAC comments and recommendations in the attached Technical 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 (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



Technical Review Memorandum

Date: March 6, 2025

To: Robert Hunter – Licensing Administrator, Nunavut Water Board

From: Joyce Demers – Industrial Coordinator, CIRNAC

Subject: Crown-Indigenous Relations and Northern Affairs Canada's Review of the Licence Construction Notice for the Doris Pad U and Contact Water Pond Application for the Hope Bay Project, Type A Water Licence No. 2AM-DOH1335

Region: ☒ Kitikmeot ☐ Kivalliq ☐ Qikiqtani

A. BACKGROUND

Hope Bay Gold Mine Project, owned by Agnico Eagle Mines Limited (Agnico) is located approximately 110 km south of the Bathurst Inlet, 705 km northeast of Yellowknife, North West Territories and 153 km southwest of Cambridge Bay in Nunavut. The Hope Bay Project is made of three distinct areas: Doris, Madrid, and Boston. Hope Bay Mine Project which currently holds five separate water license (2AM-DOH1335, 2AM-BOS1835, 2BB-MAE1727, 2BB-BOS1727 and 2BE-HOP1222).

On February 18, 2022 Agnico announced decision to suspend production at Hope Bay project, placing the mine site into care and maintenance till date while continuing to upgrade the infrastructural facilities, and provided the Nunavut Water Board (NWB) with a formal notice of Care and maintenance for Doris – Madrid operations on March 30, 2022.

Agnico retained SRK Consulting Canada Inc. to develop a detailed design report for Pad U and a lined contact water pond (CWP) at the laydown area at the Hope Bay site under water license 2AM-DOH1335.

The purpose of the design is to temporary store ore and waste rock from the Existing Doris Run of Mine (ROM) pad also called the Pad T rock storage facility. This storage of ore and waste rock will allow for construction of the new Doris power plant and mill facilities.

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
R1	Contact Water Pond
R2	Contact Water Pond – Culvert and Sump
R3	Construction Considerations – Pipelines and Other
R4	Dock Access Road
R5	Downstream Diversion Berms

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
250210 2AM-DOH1335 Design Drawing 62-686-230-001_RA-ILAE	SRJ Consulting Canada Inc., February 7, 2025
250210 2AM-DOH1335 Design Drawing 62-686-230-002_RA-ILAE	SRJ Consulting Canada Inc., February 7, 2025
250210 2AM-DOH1335 Design Drawing 62-686-230-003_RA-ILAE	SRJ Consulting Canada Inc., February 7, 2025
250210 2AM-DOH1335 Design Drawing 62-686-230-004_RA-ILAE	SRJ Consulting Canada Inc., February 7, 2025
250210 2AM-DOH1335 Design Drawing 62-686-230-005_RA-ILAE	SRJ Consulting Canada Inc., February 7, 2025
250210 2AM-DOH1335 Design Drawing 62-686-230-006_RA-ILAE	SRJ Consulting Canada Inc., February 7, 2025
250210 2AM-DOH1335 Design Drawing 62-686-230-007_RA-ILAE	SRJ Consulting Canada Inc., February 7, 2025
250210 2AM-DOH1335 Design Drawing 62-686-230-008_RA-ILAE	SRJ Consulting Canada Inc., February 7, 2025
250210 2AM-DOH1335 Notice of Construction - Pad U CWP Memo-ILAE	SRJ Consulting Canada Inc., February 7, 2025
250213 2AM-DOH1335 Notice of Construction - Pad U CWP Email Dist-OLAE	Nunavut Water Board, February 13, 2025



C. RESULTS OF REVIEW

1. Contact Water Pond

Comment:

More information is needed on:

- a. Confirm that the water entering the CWP is from the construction of Pad U;
- b. If the CWP will be located at least 31 meters from the normal high water mark of any water body;
- c. If there will be tests done on the contact water before it is released;
- d. Where the released water will do released to;
- e. How the water will be released out of the CWP;
- f. If there will be water or soil testing done besides the temperature cables monitoring around the CWP to ensure there are no leaks in the linear.

What is the concern is that without the missing information CIRNAC cannot provide an adequate review of the project.

Recommendation:

(R-01) CIRNAC recommends that the applicant provide the missing information above.

2. Contact Water Pond – Culvert and Sump

Comment:

In the document labeled Notice of construction – Pad U CWP memo under section 4.3 states that

“A passive culvert spillway design has been included to provide additional redundancy; however, it is expected that the pond capacity is adequate for most potential runoff scenarios without the culvert, provided it is maintained in a dewatered state prior to the event.”

In the document labeled Notice of construction – Pad U CWP memo under section 6 states that

“The existing sump (to be removed) or a new culvert sump should be installed at the low point of the contact water pond within the containment footprint (minimum 3 meter offset from the upstream toe). Installation of a sump will assist with pumping and maintaining the low water level within the pond during routine runoff events.”



It is unclear why a passive culvert and sump would be constructed in the lined CWP. The concern is that untested contact water will be discharged.

Recommendation:

(R-02) CIRNAC recommends that the applicant provide a relational as to why these fixtures are added and needed within the CWP.

3. Construction Considerations – Pipelines and Other

Comment:

In the document labeled Notice of construction – Pad U CWP memo under section 6 states that

“□The Doris Lake pipelines, pumps and the float plane and dock access road will require realignment prior to construction.

□Pipelines along the TIA access road will need to be relocated to avoid conflict with the Pad U ROQ pad.”

It is unclear what these pipelines hold and where (if any) liquid will be stored during the relocation of these pipelines and pumps. The concern is that materials may find themselves into nearby water bodies if there are no procedures in place a head of time.

Recommendation:

(R-03) CIRNAC recommends that the applicant clarify what and how materials from the pipelines and pumps will be stored during relocation of these pipelines and pumps or confirm the layout and design of any short term diversion of the pipeline.

4. Dock Access Road

Comment:

In the document labeled Notice of construction – Pad U CWP memo under section 6 states that

“The Doris Lake pipelines, pumps and the float plane and dock access road will require realignment prior to construction.

It is unclear how and where the dock access road will be and what measures will be implemented to ensure that no construction materials or other end up into nearby water bodies.



What is the concern is that construction materials and debris may end up in nearby water bodies.

Recommendation:

(R-04) CIRNAC recommends that the applicant clarify how and where this realigned dock access road will be implemented.

5. Downstream Diversion Berms

Comment:

It is unclear what seepage water the downstream diversion berm is going to be diverting and where it will be diverting to. The concern is that contact water will not be captured.

Recommendation:

(R-05) CIRNAC recommends that the applicant provide further explanation as to how the diversion berms will function.