



March 17, 2025

NWB File: 2AM-DOH1335

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

Re: Response to Comments on the Submission of the Doris Pad U Contact Water Pond 60-day Notice under Water Licence 2AM-DOH1335

Dear Mr. Hunter,

Agnico Eagle thanks the Nunavut Water Board for the opportunity to respond to comments received from the Kitikmeot Inuit Association, Crown-Indigenous Relations and Northern Affairs Canada, Fisheries and Oceans Canada, and Environment and Climate Change Canada regarding the 60-day Construction Notice the Pad U Contact Water Pond under Water Licence 2AM-DOH1335. Our comments are provided in the enclosed.

This 60-day Construction Notice is consistent with the approved Water Licence. Based on Agnico Eagle's interpretation of the Water Licence and associated conditions, Agnico Eagle can execute the activities and no additional information is required. As required by the Water Licence a Construction Summary Report will be provided to the Nunavut Water Board 90-days following completion of construction.

Regards,

Colleen Prather
colleen.prather@agnicoeagle.com
Permitting & Regulatory Affairs Superintendent

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KITIKMEOT INUIT ASSOCIATION (KitIA)

Request Made by Interested Party:

The KIA has no concerns or comments on the construction of the Doris Pad U and Contract Water Pond (CWP) for Water Licence No: 2AM-DOH1335

Agnico Eagle's Response to Request:

Agnico Eagle thanks the KitIA for their time and review on this 60-day notice.

CROWN-INDIGENOUS RELATIONS AND NORTHERN AFFAIRS CANADA (CIRNAC)

Interested Party:	CIRNAC	Rec No.:	CIRNAC-R-01
Re:	Contact Water Pond		

Request Made by Interested Party:

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.

CIRNAC recommends that the applicant provide the missing information above.

Agnico Eagle's Response to Request:**Response to bullet a)**

The CWP is designed to contain any contact water runoff from the contents on Pad U after it is constructed. Specifically, the CWP will be needed to contain runoff that has come into contact with ore or waste rock that may be stored within the Pad U footprint.

Response to bullet b)

The CWP and associated infrastructure is at least 31 meters from the shoreline of the Doris Lake (see Attachment 1, Drawing No. 62-686-230-004 of Notice of construction – Pad U CWP memo).

Response to bullet c), bullet d) and e)

It is expected that contact water from Pad U will be pumped to the TIA and discharged to Robert's Bay provided water quality criteria are satisfied.

Response to bullet f)

Pad U will be operated and managed in accordance with the Water Licence and Agnico Eagle's corporate governance policy for critical infrastructure. The design intent for retaining water within the CWP is for the foundation to remain frozen. As such, ground temperature monitoring and visual inspection are expected to be the primary surveillance methods for the performance of the CWP. Soil or water testing may be recommended if thermal data or visual inspections indicate a risk of water seeping out of the CWP.

Interested Party:	CIRNAC	Rec No.:	CIRNAC-R-02
Re:	Contact Water Pond – Culvert and Sump		

Request Made by Interested Party:

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.

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

Agnico Eagle’s Response to Request:

The passive culvert and new culvert sump are included in the Pad U CWP memo for two separate reasons.

The addition of the passive culvert spillway (emergency overflow channel) to the design of the CWP berm will not increase the likelihood that untested contact water will be discharged. The culvert spillway is not designed to flow under normal operating conditions, and is only installed to protect the integrity of the berm structure during upset conditions, such as an extreme precipitation event combined with prolonged pumping failures. Since the pond is designed to be dewatered within 48-hours of a precipitation event, the pond will remain empty during normal operations, with no risk of water being discharged via the spillway unintentionally.

The additional of the new culvert sump at the low point (offset min 3 m from the berm) is to mitigate ponding water within the contact water pond during normal operations. Operating the CWP in this fashion will limit thermal stress on the frozen foundation of the berm, protecting the integrity of the liner.

Interested Party:	CIRNAC	Rec No.:	CIRNAC-R-03
Re:	Construction Considerations – Pipelines and Other		

Request Made by Interested Party:

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.

Agnico Eagle's Response to Request:

Construction activities, including storage of materials will follow established construction best practices. Material from pipelines and pumps will be drained to an appropriate storage location prior to decommissioning them. As per Part D, Item 11 of the Water Licence a Construction Summary Report will be issued 90-days following the completion of construction which includes a summary of construction activities, mitigation, and monitoring.

Interested Party:	CIRNAC	Rec No.:	CIRNAC-R-04
Re:	Dock Access Road		

Request Made by Interested Party:

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.

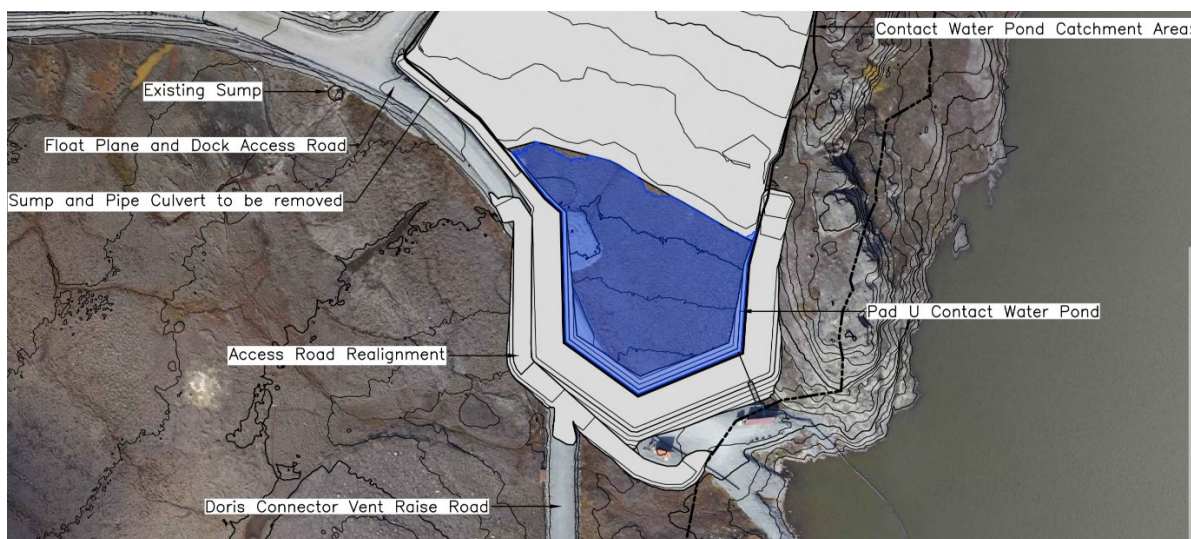
It is unclear how and where the dock access road will be and what measures will be implemented to ensure that no construction materials or other end up into nearby water bodies.

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

CIRNAC recommends that the applicant clarify how and where this realigned dock access road will be implemented.

Agnico Eagle’s Response to Request:

It is expected that a portion of the existing dock access road be realigned to outside the footprint of the CWP berm as shown on Attachment 1, Drawing No. 62-686-230-004 of Notice of construction – Pad U CWP memo. The realigned portion of the access road will tie back into the existing portion of the access road near the float plane dock access (see below).



The access road realignment work will be carried out in accordance with the Water Licence and established construction best practices. The following specific measures will be implemented to mitigate the impact of construction activities to the nearby water bodies:

- CWP berm construction and access road realignment will take place in winter, where no rain events or surface water flow can occur.
- The 31 m setback from the high-water mark of nearby water bodies will be respected. As shown on Attachment 1, Drawing No. 62-686-230-004 of Notice of construction – Pad U CWP memo, the access road realignment is outside the setback.
- Construction/environmental inspections and good site management practices to mitigate the risk of debris leaving the work area.

Interested Party:	CIRNAC	Rec No.:	CIRNAC-R-05
Re:	Downstream Diversion Berms		

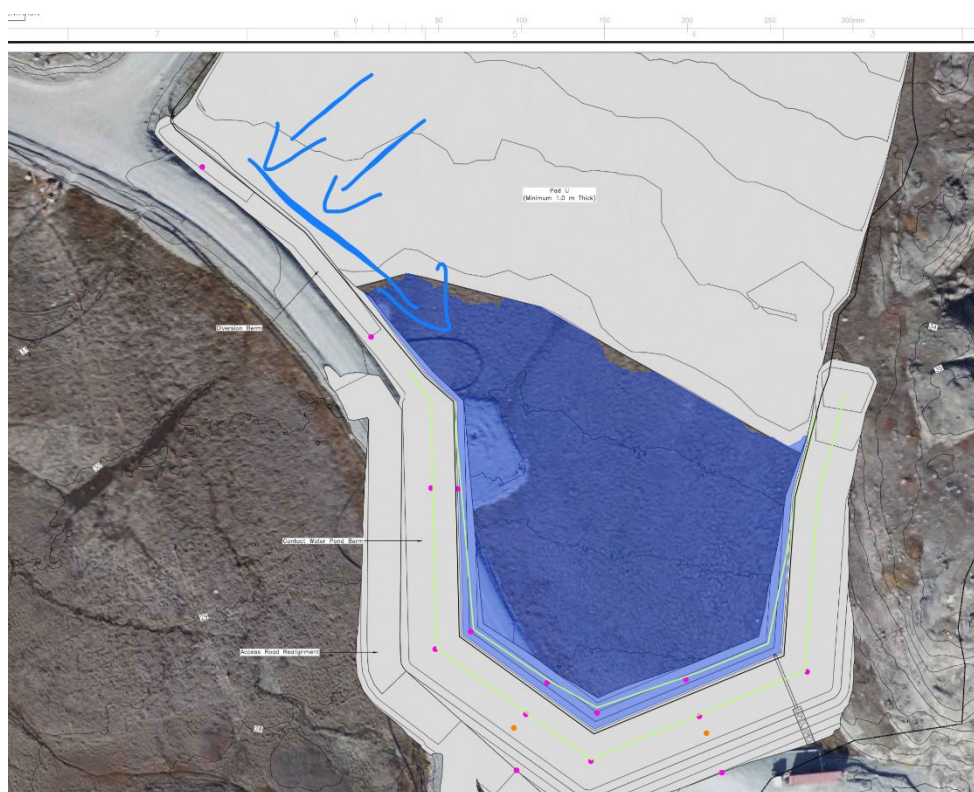
Request Made by Interested Party:

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.

CIRNAC recommends that the applicant provide further explanation as to how the diversion berms will function.

Agnico Eagle's Response to Request:

The downstream diversion berm (as shown in Attachment 1, Drawing No. 62-686-230-004 of Notice of construction – Pad U CWP memo) is designed to divert surface contact water from the east side of Pad U towards the CWP (see below).



FISHERIES AND OCEANS CANADA (DFO)

Request Made by Interested Party:

The Department of Fisheries and Oceans Canada (DFO) has reviewed the Limited's Notice of Construction for Doris Pad U and Contact Water Pond, file number: 2AM-DOH1335 in accordance with DFO's mandate and has no comments or recommendations at this time.

Agnico Eagle's Response to Request:

Agnico Eagle thanks DFO for their time and review on this 60-day notice.

ENVIRONMENT AND CLIMATE CHANGE CANADA (ECCC)

Request Made by Interested Party:

ECCC has reviewed this file in accordance with our mandate and has no comments at this time.

Agnico Eagle's Response to Request:

Agnico Eagle thanks ECCC for their time and review on this 60-day notice.