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NUNAVUT WATER BOARD
NUNAVUT IMALIRIYIN KATIMAYINGI
OFFICE DES EAUX DU NUNAVUT

File: 2AM-DOH1335/B15, J4, J5

September 1, 2022

Jamie Quesnel
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RE: Licence No: 2AM-DOH1335 Type “A”, Doris-Madrid Project; Agnico Eagle Mines Limited; Care and Maintenance Plan.

Dear Mr. Quesnel:

On February 18, 2022, Agnico Eagle Mines Limited (Agnico Eagle or Licensee) announced its decision “to place the Doris Mill into Care and Maintenance and suspend production of the Hope Bay Project”. On March 30, 2022, Agnico Eagle provided the Nunavut Water Board with formal written notice of Care and Maintenance for the Doris-Madrid operations under Part J, Item 4 of the Water Licence No: 2AM-DOH1335 (Water Licence).

On April 29, 2022, Agnico Eagle submitted the Care and Maintenance Plan as required by Part J, Item 5 of the Water Licence. Three management plans were updated and submitted along with the Care and Maintenance Plan as per Part B Item 15. These plans included the Doris-Madrid Water Management Plan, Explosives Management Plan and the Operations, Maintenance, and Surveillance Manual: Doris Tailings Impoundment Area (Plans).

On May 2, 2022, the NWB distributed the Care and Maintenance Plan along with the three Plans for a 30-day public review. Parties were invited to submit comments by June 2, 2022. On May 11, 2022, CIRNA requested a one-month extension¹ and set the deadline to submit comments by July 13, 2022.

Submissions were received on July 11, 2022 from Crown-Indigenous Relations and Northern Affairs (CIRNA) and on July 13, 2022, from Environment and Climate Change Canada (ECCC) and the Kitikmeot Inuit Association (KIA).

¹ Email from Vincent Okonkwo to Robin Ikkutisluuk, Re: CIRNAC Extension Request for the Submission of 2021 Annual Report and Management Plans

Agnico Eagle provided responses to parties' Information Requests (IRs) on July 29 and August 18, 2022. Following is a summary of the comments/questions and Licensee's responses.

Crown-Indigenous Relations and Northern Affairs (CIRNA) – 4 IRs

1. CIRNA requested clarification 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 Impoundment Area (TIA).

Agnico Eagle's response: (CIRNAC-1)

- 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.
2. CIRNA recommends that Agnico Eagle 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?

Agnico Eagle's response: (CIRNAC-2)

- Table 1-2 and Table 1-3 were revised to indicate dates of completion and/or dates to be completed and/or actions to address the requirement. The full tables can be viewed in the document *Proponent's Response to Comments received on the Hope Bay Care and Maintenance Plan, April 2022, Version 1*, dated July 29, 2022.
3. CIRNA recommends updates to the Operations, Maintenance, and Surveillance Manual: Hope Bay Doris Tailings Impoundment Area (TIA OMS) to resolve inconsistencies with the TIA OMS and the Care and Maintenance Plan.

Agnico Eagle's response: (CIRNAC-3)

- The TIA OMS will be revised to include the water treatment plant installed north of the TIA, the spillway and interim dike as discussed in the Care and Maintenance Plan.
4. CIRNA recommends that Agnico Eagle clarify the changes made to the management plans in relation to the care and maintenance status of the site.

Agnico Eagle's response: (CIRNAC-4)

- Agnico provided a summary of changes made to the following plans:

- Hope Bay Project Emergency Response Plan (June 28, 2022)
- Hope Bay Project Spill Contingency Plan (June 28, 2022)
- Hope Bay Project Doris-Madrid Water Management Plan (April 29, 2022)
- Hope Bay Project Explosives Management Plan (April 29, 2022)
- Hope Bay Project, Phase2 Doris Tailings Impoundment Area – Operations, Maintenance, and Surveillance Manual (April 29, 2022)

Environment and Climate Change Canada (ECCC) – 1 IR

1. ECCC requested more information on the issue that the new water management strategy is intended to mitigate, along with timelines for implementation and predicted changes to discharge water quality.

Agnico Eagle's response: (ECCC-1)

- The revised water management strategy is required to meet the toxicity criteria for *Arcatia tonsa* required by the Metal and Diamond Mining Effluent Regulations. The revised strategy is expected to reduce the salinity of the effluent and allow discharge of compliant effluent.
- The new water management strategy will be implemented throughout the Care and Maintenance period.
- There will be no change to the predicted discharge water quality (i.e., the saline underground water will be kept separate within the TIA and a water treatment plant will be installed North of the TIA to address potential exceedance of discharged effluent. Water quality of effluent to be discharged will meet compliance requirements.

Kitikmeot Inuit Association (KIA) – 10 IRs

1. KIA requested that Agnico Eagle provide a schedule for the update to the mine closure plan and security amount for the Doris-Madrid Project.

Agnico Eagle's response: (KIA-1)

- An updated Hope Bay Closure Plan based on changes to the mine plan and associated closure cost/security amounts will be submitted in February 2023 in accordance with Part J, Item 6 of the Water Licence.
2. KIA requested an update to closure cost estimate for Madrid Advance Exploration Project (MAEP)

Agnico Eagle's response: (KIA-2)

- 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 in accordance with Part C, Item 4 of the Type B Water Licence 2BB-MAE1727.

3. KIA requested information regarding the sump and Contact Water Pond (CWP) located at the Naartok East Crown Pillar (NECP) area.

Agnico Eagle's response: (KIA-3)

- Agnico Eagle provided detailed responses regarding the sump and CWP, the maximum allowed water levels in the CWP and NECP closure plan. The full response can be viewed in the document *Proponent's Response to Comments received on the Hope Bay Care and Maintenance Plan, April 2022, Version 1*, dated July 29, 2022.
4. KIA requested that Agnico Eagle provide a permanent closure plan for the Madrid North portal and a schedule to complete the work.

Agnico Eagle's response: (KIA-4)

- The closure of the Madrid North portal will be detailed in the next iteration of the Hope Bay Closure Plan (February 2023) in accordance with Part J, Item 2 of the Type A Water Licence 2AM-DOH1335. The portal is currently being backfilled.
5. KIA requested the amounts of ore and waste rock stored at the surface when the mine is in Care and Maintenance, whether ore will be processed, their impacts on water quality and any management strategies.

Agnico Eagle's response: (KIA-5)

- The amount of waste rock stored on the surface at the end of February 2022 was 736,479 tonnes. The expected waste rock to be hauled to surface during 2022 and 2023 mining activities is 221,000 tonnes.
 - The amount of ore stored on the surface before the mill closure is 93,000 tonnes.
 - Water management for the ore stockpile remains consistent with the Hope Bay Water Management Plan and no changes are proposed.
 - A 60-day notice will be provided prior to commencement of construction for the existing approved footprint in accordance to Type "A" Water Licence 2AM-DOH1335 Part D Items 1 & 2.
6. Given dewatering of the TIA to Roberts Bay via the Roberts Bay Discharge System (RBDS) pumphouse was suspended in November 2021, how will water management during Care and Maintenance (C&M) be undertaken to achieve the goal of maintaining the water level at the "lowest possible levels"?

Agnico Eagle's response: (KIA-6)

- Discharge to Roberts Bay was restarted in accordance with Metal and Diamond Mines Effluent Regulations in June 2022. On May 27, 2022 Agnico Eagle submitted a modification request to the NWB for the installation of a temporary water filled portable dam within the approved Tailings Impoundment Area (TIA). The permanent TIA dike is proposed to be built in the next 12 months. The purpose of the portable dam is to segregate underground water and to isolate the construction area for the permanent dike. Construction of the Emergency Overflow Channel (spillway) is anticipated to occur late 2022. Detailed design drawings will be prepared and submitted to the NWB as part of the Notice of Construction at least 60 days prior to construction.
7. KIA requested that Agnico Eagle confirm that the facilities (sedimentation ponds, pollution control ponds, groundwater interceptor sumps and CWP's) will be operated as designed during C&M including limiting the retention period during which water is to be stored in CWP's, as per the FEIS design documents requested that Agnico Eagle confirm that the facilities will be operated as designed during C&M including limiting the retention period during which water is to be stored in CWP's, as per the FEIS design documents.

Agnico Eagle's response: (KIA-7)

- No changes to the operating controls are expected during Care and Maintenance. Agnico Eagle Mines Limited can confirm that the ponds will be operated with limited retention time as per the original design considerations.
8. KIA requested Agnico Eagle provide evidence within the Care and Maintenance Plan to provide reviewers with confidence that the new storage of surface waste rock at Doris will not result in the degradation of the receiving environment.

Agnico Eagle's response: (KIA-8)

- Detailed design of a new waste rock stockpile within the approved project footprint at Doris will be submitted to the Nunavut Water Board at least 60 days prior to commencement of construction as per Water Licence Part D Items 1 & 2. As part of this design package, drainage and water management details will be outlined that provide protection of the receiving environment consistent with Agnico Eagle Mines Limited water management strategy detailed in the *Hope Bay Project Doris and Madrid Water Management Plan*.
9. Agnico Eagle should provide more information within the Care and Maintenance Plan outlining the TIA's capacity to store noncompliant water and what approaches may be considered if that capacity is reached given a reduced site presence during Care and Maintenance.

Agnico Eagle's response: (KIA-9)

- There will be no changes to the environment site personnel or management and monitoring of the Tailings Impoundment Area through Care and Maintenance. Agnico Eagle Mines Limited will continue to implement the monitoring outlined in the *Hope Bay Project, Phase 2 Doris Tailings Impoundment Area – Operations, Maintenance, and Surveillance Manual*.

10. The timeframe for the installation of the additional water treatment plant should be provided. Agnico Eagle should also clarify whether the additional water treatment plant is required to support Care and Maintenance or whether it is supplemental until such time as operations recommence.

Agnico Eagle's response: (KIA-10)

- The Veolia Water Treatment Plant is anticipated to be commissioned by Freshet 2023. No changes to environment support personnel are planned for the Care and Maintenance period. Additional water treatment plant support may be required and will be assessed as part of Agnico Eagle Mines Limited Operational Readiness Plan. Relief water treatment operators have been a part of the existing Hope Bay TSS Treatment Plant and have been sourced from companies such as BQE and StormTec.

On August 4, 2022 and August 8, 2022, ECCC and CIRNA confirmed that the responses from Agnico Eagle are acceptable. On August 15, 2022, the KIA provided follow-up questions to Agnico's responses. Agnico responded on August 18, 2022. KIA confirmed on August 23, 2022 that all their IRs had been resolved.

Copies of all documents received in support of the Care and Maintenance planning can be accessed through the NWB's Public Registry and FTP site using the following Link:

<ftp://ftp.nwb-oen.ca/registry/2%20MINING%20MILLING/2A/2AM%20-%20Mining/2AM-DOH1335%20AEM/3%20TECH/J%20A%20and%20R>

As stated above, Agnico Eagle has submitted updated management plans along with the Care and Maintenance Plan. These plans include the Doris-Madrid Water Management Plan, Explosives Management Plan and the Operations, Maintenance, and Surveillance Manual: Doris Tailings Impoundment Area (Plans). These Plans are being accepted by the Board along with the approval of the Care and Maintenance Plan.

The Licensee is reminded that as per Part J, Item 6 of Water Licence No: 2AM-DOH1335 Agnico Eagle is required to submit an updated estimate of total mine closure restoration liability, within twelve (12) months of entering Care and Maintenance and every 3 years thereafter.

Also, as per Part F, Item 19(e) of Water Licence No: 2AM-DOH1335 Agnico Eagle is required to carry out, at a minimum, monthly inspections of the TIA, weather permitting.

Should you have any questions regarding the above, please contact the NWB Licensing Department by email to licensing@nwb-oen.ca or by phone at (867) 360-6338.

Sincerely,

Karén Kharatyan
Nunavut Water Board, Director Technical Services

KK/as/rqd

Copy Distribution List – Doris North