



# AGNICO EAGLE

VIA EMAIL  
**NIRB File No: 03MN107**

February 13, 2015

Mr. Ryan Barry, Executive Director  
Nunavut Impact Review Board  
P.O. Box 1360  
Cambridge Bay, NUNAVUT  
X0B 0C0  
Email: [rbarry@nirb.ca](mailto:rbarry@nirb.ca)

Dear Mr. Barry:

**Re: Vault Pit Expansion Project at Meadowbank  
NIRB's Reconsideration of Project Certificate**

Thank you for your letter of January 23, 2015 regarding the next steps for the NIRB's reconsideration of the terms and conditions within Project Certificate No. 004 for AEM's Meadowbank Gold Mine Project, specifically to authorize the Vault Pit expansion. We are writing to seek assistance from the NIRB staff with request to our seeking additional clarity or better understanding on our part on the specific Terms of Reference for the Vault Pit Expansion addendum to the original Meadowbank FEIS as requested by the NIRB.

We understand the need for the comprehensive addendum but in our view this addendum should focus primarily on the environmental and socio-economic effects directly associated with the proposed pit expansion (including areas of change at the existing Meadowbank Mine that will be directly related to the proposed pit expansion).

The reference in the NIRB letter of January 23rd to the need for the Vault Pit Expansion addendum to meet conformity with the original Meadowbank EIS Guidelines that were issued in February 2004 has raised questions and caused some concern on our side. It is in this area where we especially need assistance from the NIRB staff in understanding the mechanics of how the addendum can be prepared while meeting these guidelines. In our view many of these guidelines do not apply when viewed through the lens of looking at the potential effects that are directly associated with the proposed Vault Pit expansion. In some cases a one or two paragraph statement for each specific guideline would be adequate to make this point within the addendum but there are many such guidelines that would have to be addressed in this manner making for a much longer addendum that may move the reader's focus away from the direct effects that need assessment with the addendum. There are also issues that clearly need to be addressed in the addendum but where the assessment needs to be focused on how the new project activities will alter or change the existing interaction with the Meadowbank Project without going back to revisit interactions that have already been assessed in the original Meadowbank EA process. An example of such an activity would be interaction with caribou.

Through this letter AEM asks for additional guidance from the NIRB staff on the application of these 2004 EIS Guidelines to the Vault Pit Expansion addendum, especially with respect to the mechanics of how to decide what should be included and what does not need to be included and how to address guidelines that have little application when looking at the direct Vault Pit Expansion activities. Without better clarity and understanding of what is expected we worry that our addendum will never meet the expectations of the NIRB staff or other intervening parties because there was not a clear expectation set at the outset.



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AEM has conducted our own review of the February 2004 EIS Guidelines published by NIRB for the original environmental and socio-economic assessment of the Meadowbank Project. We compared these guidelines against the Vault Pit Expansion Project Description document that we submitted to the NIRB in July of 2014 and have created a Table (copy attached as an appendix to this letter) to help us better understand what guidelines we think we have already addressed in the July 2014 Project Description document and also what guidelines we think would not apply to this addendum as they cover areas not directly affected by the proposed pit expansion activity. These are guidelines from the original assessment of the Meadowbank Project that in our mind should not have to be revisited in the Vault Pit Expansion addendum. It is our intent to use the July Project Description document as the basis for the new EIS Vault Pit Expansion addendum.

We would appreciate receiving further guidance on how these 2004 EIS Guidelines should be applied by AEM in preparing the EIS addendum. Should you have any questions or concerns, please do not hesitate to contact me at 819-763-0229 or [stephane.robert@agnicoeagle.com](mailto:stephane.robert@agnicoeagle.com).

Yours sincerely,

Stéphane Robert  
Manager Regulatory Affairs

Attached: Appendix A\_2004 Mdbk EIS Guidelines\_ConcordanceTable\_Phaser Pit Expansion

Regards  
**Agnico Eagle Mines Limited**

Stephane Robert,  
Manager Regulatory Affairs Nunavut

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