



Water Resources Division  
Nunavut Regional Office  
P.O. Box 100  
Iqaluit, NU X0A 0H0  
2MA-MEA

Your File:

Our File: 9545-2-2MEAG

November 2, 2007

Phyllis Beaulieu  
Licensing Administrator  
Nunavut Water Board  
P.O. Box 119  
Gjoa Haven, NU, X0A 1J0

**Re: 2AM-MEA – MEADOWBANK GOLD PROJECT WATER LICENSE  
APPLICATION – MEADOWBANK MINING CORPORATION – AGNICO-  
EAGLE MINES LTD.**

Indian and Northern Affairs Canada (INAC) has reviewed the Meadowbank Gold Project Type A Water License Application and its supporting documents submitted to the Nunavut Water Board (NWB) on September 24, 2007. The following advice has been provided pursuant to INAC's mandated responsibilities for the enforcement of the *Nunavut Waters and Nunavut Surface Rights Tribunal Act* (NW&NSRT) and the *Department of Indian Affairs and Northern Development Act* (DIAND Act). In conducting our review, INAC referred to the documents on the NWB's FTP-site under 2AM-MEA.

Indian and Northern Affairs Canada recommends that the Nunavut Water Board take into consideration the following comments when reviewing this type A Water License Application.

**General Concerns:**

- A major concern is lack of adherence to the suggested form of referencing and cross-referencing found under the Nunavut Water Board's Guideline for the Applicant which clearly states that: "Cross-referencing to all sub-documents and reference materials should include title, section, and page number of the supporting document." The Applicant has not been following this as only the title of the supporting document has been referenced without any mention of the section or page number where the referenced material is to be found.
- Information regarding the incinerator to be used at the Meadowbank Gold Project needs to be expanded, including detailed information on the actual incinerator to be used at the site.
- Supporting document number 450: *Meadowbank Gold Project Water Quality and Flow Monitoring Plan* does not contain a table of contents. The overall readability of the document would be improved if a TOC were to be included.



- Supporting document number 516: *Water Quality Predictions Meadowbank Gold Project*, refers to table 3.1, 3.2 and 3.3. These tables are not included in the document.
- Supporting document: *CV's for Signing Professionals*, does not have a front page.

#### **Meadowbank Gold Project Spill Contingency Plan (Document 483)**

- Under list 2 Spill Contingency Plan point ii) in the Nunavut Water Board Preliminary Guidelines for the Applicant it is stated that the Spill Response Plan should include the following information: "Identification, description and evaluation of the potential impacts of all project-related accidents and malfunctions (i.e. types, sources, threat-risk assessment, worst-case scenarios, etc.) that may occur during each phase of the project,...". The Proponent has included a chapter called Emergency Scenarios (Section 5) in document number 482; The Meadowbank Gold Project Emergency Response Plan; however, several of the scenarios are not adequately identified, described and evaluated. The Proponent will be developing these later. INAC would like the Proponent to commit to a set timeline for the development of these emergency scenarios.

#### **Landfill Design and Management Plan Meadowbank Gold Project (Document 458)**

- The report states explicitly under section 4.1 Approach that: *'the leachate from the proposed landfills is anticipated to be very weak due to the controls on materials placed in the landfill and thus site specific landfill leachate management is not considered to be required.'* As ash from the incinerator is proposed to be disposed of in the landfill, INAC recommends leachate monitoring.
- Section 4.4 Total Volume of Waste would benefit vastly if a reference/source was provided for the calculations and numbers given. Why is it assumed that each person will produce 1 tonne of refuse each year and that 50% of that weight can be incinerated? How did they arrive at these numbers? It would lend credibility to the total volume of waste if a proper source was referenced.

#### **Proposed Water Treatment Methods Meadowbank Gold Project (Document 467)**

- Section 3.4 Treatment Method Proposed for the Post Closure Period, Sludge Management: Disposal and Storage, should be developed further. The section should state explicitly what the sludge management involves and describe that in detail. As the section is today, no specific method is decided upon as there are two suggested methods, either freeze-back with the tailings or disposal at the base of Portage Pit Lake. INAC recommends that the Proponent identifies the preferred method of sludge management and expands on that option.

#### **Landfarm Option Analysis Meadowbank Gold Project (Document 498)**

- The report does not identify whether or not the Proponent is going to be establishing a landfarm on site as this is only one of four options in treating petroleum hydrocarbon contaminated soil identified in the report. In order for INAC to evaluate



a proposed landfarm, the Proponent is encouraged to decide whether to go forward with this option and develop it further, or develop an alternative management plan for petroleum hydrocarbon contaminated soil.

- If the Proponent should decide to go forward with the landfarm option certain criteria should apply:
  - The liner should be inspected for damages during construction.
  - Either a catchment trench or monitoring should be put in place in order to avoid adverse impact on subsurface and surface waters in case of a leaking liner.
  - If nutrient amendment should be required an experienced bioremediation expert should be hired, and the nutrient addition should be carefully monitored.
  - Dilution of contaminated soil with clean soil is not recommended. Already treated soil should be used if dilution is intended.
  - The Proponent should ensure that the appropriate expertise and equipment is on site.
  - Details pertaining to monitoring should be provided including whether lab analyses are performed on site or by and accredited lab facility.

Please contact F. Reinhart at (867) 975-4548 or by email at [ReinhartF@inac-ainc.gc.ca](mailto:ReinhartF@inac-ainc.gc.ca) or myself should you have any questions or comments with regards to the foregoing.

Regards,

***Original signed by***

Jim Rogers  
Manager, Water Resources

Cc. F. Reinhart, Indian and Northern Affairs Canada, Nunavut Regional Office