

**WHALE TAIL EXPANSION PROJECT
WATER LICENCE AMENDMENT APPLICATION**

NWB Water Licence 2AM-WTP1826

Review of AEM Response to KIA Information Requests

Prepared By:



KIVALLIQ INUIT ASSOCIATION

and

NUNAVUT TUNNGAVIK INC.

August 09, 2019

WITH SUPPORT FROM



**Hutchinson Environmental
Sciences Ltd.**

And



**GeoVector Management
Inc.**

Prepared For:

Nunavut Water Board

August 09, 2019

Mr. Richard Dwyer
Nunavut Water Board
richard.dwyer@nwb-oen.ca

Dear Mr. Dwyer:

Re: **WHALE TAIL EXPANSION PROJECT WATER LICENCE AMENDMENT APPLICATION**
Review of AEM Response to KIA Information Requests

The attached report and spreadsheet contain our responses to AEM's provision of additional information in response to our Information Requests that were submitted to the NWB on July 18, 2019. We thank AEM for their prompt responses, the NWB for facilitating the review process and look forward to the technical review phase.

Sincerely



Neil J. Hutchinson, Ph.D.
Hutchinson Environmental Sciences Ltd.
Neil.hutchinson@environmentalsciences.ca

For
Kivalliq Inuit Association/Nunavut Tunngavik Inc.

Cc: Luis Manzo – Director of Lands - Kivalliq Inuit Association
Ashley Burton - Kivalliq Inuit Association
Brenda Osmond - Kivalliq Inuit Association
Alan Sexton – GeoVector Management Inc.
Richard Nesbitt - Hutchinson Environmental Sciences Ltd.

Attachment: WT-IR-Responses-09082019.xls

Executive Summary

The Kivalliq Inuit Association (KivIA) has completed their review of Agnico Eagle Mines Limited's (AEM) responses to their Information Requests regarding the Whale Tail Pit – Expansion Project Water Licence Amendment Application. This application is associated to NWB Licence Number 2AM-WTP1826 and is located on Inuit Owned Land (IOL) approximately 150 kilometers north of the hamlet of Baker Lake. The IOL parcel involved is BL 43. Our Information Requests were submitted on July 18, 2019 following our initial review of the application, in order to make sure that we had the information required to complete our technical review.

AEM's responses were provided to the KIA by the Nunavut Water Board (NWB) on August 2 2019. AEM provided thoughtful and informative responses to our requests. Our original review identified 51 areas in which additional information was required to complete our full technical review. Of the 51 requests:

- The responses resolved 20 of our requests and no follow up is required,
- The responses partially addressed 3 of our requests and additional information is requested to inform our technical review;
- The responses resolved 28 of our information requests and will inform further discussion during the technical review in order to address our concerns.

Our review is summarized in the attached spreadsheet which identifies and names each IR, provides a summary of AEM's response, our request for additional information for IRs #KivIA-IR3, KivIA-IR7 and KivIA-IR10 and identifies the 28 topics which will be carried forward for further discussion and resolution during the technical review stage. We note, however, that these 28 may not represent the only topics for detailed discussion, as our review may raise questions for topics for which the Water Licence submission contains the information required for our review.

1. Introduction

Nunavut Tunngavik Inc. (NTI) and the Kivalliq Inuit Association (KivIA) have completed a technical review of Agnico Eagle Mines Limited's (AEM) Whale Tail Pit – Expansion Project Water Licence Amendment Application. This application was submitted to the Nunavut Water Board (NWB) in May 2019 and is associated to NWB Licence Number 2AM-WTP1826 and is located on Inuit Owned Land (IOL) approximately 150 kilometers north of the hamlet of Baker Lake. The IOL parcel involved is BL 43.

The KivIA and NTI, represent Inuit beneficiaries of the Nunavut Land Agreement at the regional and territorial levels, respectively. In particular, both organizations manage Inuit Owned Lands (IOL) with the main aim of promoting self-reliance and social well-being of Inuit now and in the future. Both organizations manage IOL in order to support sustainable economic development opportunities for Inuit as long as it is completed in an environmentally and socially responsible manner.

The technical review was completed with support from Hutchinson Environmental Sciences Ltd. and GeoVector Management Inc. to ensure that the potential impacts and benefits were comprehensively assessed through scientific and socio-economic best practices, and to ensure Inuit Qaujimajatuqangit (IQ) values continue to be incorporated into impact determination, mitigation, project design and monitoring.

The documents reviewed consisted of the following:

- ❖ Water Licence Amendment Application for 2AM-WTP1826;
- ❖ Water Licence Amendment Application for 2AM-MEA1526;
- ❖ Water Licence Amendment Application for 2BB-MEA1828;
- ❖ Main Application Document;
- ❖ Executive summary in English and Inuktitut;
- ❖ Letter to NWB;
- ❖ Filled out Supplemental Information Guide table;
- ❖ NPC conformity determination;
- ❖ Compliance assessment;
- ❖ Certificate of Incorporation;
- ❖ List of Permits and Licenses for the Project;
- ❖ Record of consultations;
- ❖ Whale Tail Pit Waste Rock Management Plan dated May 2019;
- ❖ Thermal Monitoring Plan dated May 2019;
- ❖ Water Quality Monitoring and Management Plan for Dike Construction and Dewatering dated May 2019;
- ❖ Whale Tail Pit Expansion Project Landfill Design and Waste Management Plan dated April 2019;
- ❖ Whale Tail Pit Water Management Plan dated May 2019;
- ❖ Whale Tail Pit Water Quality and Flow Monitoring Plan dated May 2019;
- ❖ Whale Tail Pit – Expansion Project Landfarm Design and Management Plan dated April 2019;
- ❖ Whale Tail Pit – Incinerator and Composter Waste Management Plan dated April 2019;
- ❖ Whale Tail Pit - Expansion Project Haul Road Management Plan dated April 2019;

- ✿ Ammonia Management Plan Whale Tail Pit Expansion Project dated April 2019;
- ✿ Meadowbank and Whale Tail Bulk Fuel Storage Facility: Environmental Performance Monitoring Plan dated April 2019;
- ✿ Whale Tail Pit – Emergency Response Plan dated May 2019;
- ✿ Hazardous Materials: Meadowbank Mine Site, Whale Tail Pit Site, Baker Lake Facilities Management Plan dated May 2019;
- ✿ Spill Contingency Plan dated April 2019;
- ✿ Groundwater Monitoring Plan dated May 2019;
- ✿ Conceptual Fish Habitat Offsetting Plan dated April 2019;
- ✿ Operational ARD-ML Sampling and Testing Plan – Whale Tail Pit Expansion Project dated April 2019;
- ✿ Core Receiving Environment Monitoring Plan: 2015 Plan Update – Whale Tail Pit Expansion Addendum_NWB dated April 2019;
- ✿ Interim Closure and Reclamation Plan dated May 2019;
- ✿ Quality Assurance / Quality Control (QA/QC) Plan dated May 2019;
- ✿ Operation & Maintenance Manual Sewage Treatment Plant (STP) dated May 2019;
- ✿ Updated Hydrogeological Assessment, Whale Tail Pit, Expansion Project dated May 6, 2019;
- ✿ 2019 Mean Annual Water Balance Update, dated May 2019;
- ✿ Mine Site and Downstream Receiving Water Quality Predictions dated May 2019;
- ✿ Whale Tail Lake Thermal Assessment dated April 2019;
- ✿ Site layout;
- ✿ Pre-development layout;
- ✿ Planned site layouts for 2019 through 2025 and 2042 post-closure;
- ✿ Operation IVR Attenuation Pond Dikes Longitudinal Profiles and Sections;
- ✿ IVR WRSF cross-section drawing;
- ✿ Typical section and road widening;
- ✿ Appendix K – Project Design Considerations.

On July 18, we completed our initial review of the application and supporting documents and submitted Information Requests relating to 51 topics for which additional information was considered necessary to inform our technical review.

2. Summary of Information Request Responses

AEM's responses were provided to the KIA by the Nunavut Water Board (NWB) on August 2 2019. AEM provided thoughtful and informative responses to our requests. Our original review identified 51 areas in which additional information was required to complete our full technical review. Of the 51 requests:

- ❁ The responses resolved 20 of our requests and no follow up is required,
- ❁ The responses partially addressed 3 of our requests and additional information is requested to inform our technical review;
- ❁ The responses resolved 28 of our information requests and will inform further discussion during the technical review in order to address our concerns.

Our review is summarized in the attached spreadsheet (WT-IR-Responses-09082019.xls) which identifies and names each IR, provides a summary of AEM's response, our request for additional information for IRs #KivIA-IR3, KivIA-IR7 and KivIA-IR10 and identifies the 28 topics which will be carried forward for further discussion and resolution during the technical review stage. We note, however, that these 28 may not represent the only topics for detailed discussion, as our review may raise questions for topics for which the Water Licence submission contains the information required for our review.

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