



Your file - Votre référence
2AM-MEA1525

December 4, 2015

Our file - Notre référence
IQALUIT-#1001346

Phyllis Beaulieu
Manager of Licensing
Nunavut Water Board
GJOA HAVEN, NU X0E 1J0

Sent via email: licensing@nwb-oen.ca

Dear Ms. Beaulieu,

**Re: Agnico Eagle Mines Ltd.'s Submission of Updated Management Plans Pursuant to Part B,
Item 14 of Renewed Water Licence, No. 2AM-MEA1525**

Thank you for your email of November 4, 2015 concerning the above mentioned submission. A memorandum is provided for the Nunavut Water Board's consideration. Comments and recommendations have been provided pursuant to Aboriginal Affairs and Northern Development Canada's mandated responsibilities under the *Nunavut Waters and Nunavut Surface Rights Tribunal Act* and the *Department of Indian Affairs and Northern Development Act*.

Please do not hesitate to contact me by telephone at 867-975-4555 or email at David.Abernethy@aandc-aadnc.gc.ca for further information.

Sincerely,

David Abernethy

Regional Coordinator
Water Resources Division
Resource Management Directorate
Aboriginal Affairs and Northern Development Canada
IQALUIT, NU X0A 0H0

Encl.

c.c.: Amjad Tariq, Regulatory and Science Advisor, Water Resources Division, AANDC Nunavut
Andrew Keim, A/Manager, Water Resources Division, AANDC Nunavut
Erik Allain, Manager, Field Operations Division, AANDC Nunavut

Memorandum

Our file - Notre référence
IQALUIT-#1001346

To: Phyllis Beaulieu, Manager of Licensing, Nunavut Water Board

From: David Abernethy, Water Resources Regional Coordinator, Aboriginal Affairs and Northern Development Canada

Cc: Amjad Tariq, Regulatory and Science Advisor, AANDC;
Andrew Keim, A/Manager, Water Resources Division, AANDC;
Christine Wilson, Water Resources Officer, AANDC; and
Erik Allain, Manager, Field Operations Division, AANDC

Date: December 4, 2015

Re: **Submission of Updated Management Plans Pursuant to Part B, Item 14 of Renewed Water Licence, No. 2AM-MEA1525**

Applicant: Agnico Eagle Mines Ltd.
Project: Meadowbank Gold Mine
Region: Kivalliq

Comments:

A. Background

On November 4, 2015, the Nunavut Water Board (NWB) invited interested parties to review updated management plans that were submitted by Agnico Eagle Mines Ltd. (the proponent) pursuant to Part B, Item 14 of their current licence, No. 2AM-MEA1525. This licence conditions states:

The Licensee shall updated and revise for submission to the Board for approval in writing, within sixty (60) days of issuance of this Licence, the following management plans. The updates are to take into account commitments made with respect to submissions received during the technical review of the Application, as well as final submissions and issues raised during the Public Hearing, where applicable.

- a) *Aquatic Effect Management Program (AEMP);*
- b) *Core Receiving Environment Monitoring Program (CREMP);*
- c) *Water Management Report and Plan;*
- d) *Freshet Action Plan;*
- e) *Ammonia Management Plan;*
- f) *Groundwater Monitoring Plan;*
- g) *Tailings Storage Facility: Operation, Maintenance and Surveillance Manual;*
- h) *Operation and Maintenance Manual, Sewage Treatment Plan; and*
- i) *Spill Contingency Plan*

Interested parties were asked to provide comments by December 4, 2015.

B. Results of review

On behalf of Aboriginal Affairs and Northern Development Canada's (AANDC or the department) Water Resources Division, the following comments and recommendations are provided:

1. Freshet Action Plan – Schedule 1: ST-16 Seepage Monitoring Program

In response to the department's technical comment #F1, the proponent noted that its Freshet Action Plan includes a revised ST-16 Seepage Monitoring Program (NP-2 Lake as well as downstream lakes: NP-1, Dogleg and Second Portage Lakes). The department requested an increased frequency of water quality monitoring as a result of the now rescinded November 8, 2013 AANDC Inspector's Direction concerning the release of waste from Monitoring Station ST-16 into the nearby NP-2 Lake (tailings effluent / waste rock seepage).

Schedule 1 of the submitted Freshet Action Plan provides an ST-16 Seepage Monitoring Plan for May/early June (when water is present) until freeze-up. This schedule indicates that in addition to monthly analysis of several parameters in accredited labs, CN Wad samples will be analyzed in the proponent's Assay Lab initially twice a week and then once a week after one month on an annual basis.

Recommendation

The proponent should confirm how long the ST-16 Seepage Monitoring Program presented in the Freshet Action Plan will be implemented (i.e., Until closure activities are complete, then re-assessment of frequency?).

2. Freshet Action Plan – Inclusion of Monitoring Program Stations

It is not clear if the revised Freshet Action Plan makes reference to all applicable licensed Monitoring Program Stations (Schedule I of the licence). Appendix 2 of the plan (map) identifies monitoring stations and corresponding document sections that provide further information on monitoring activities.

Recommendation

The proponent should ensure that all applicable licensed Monitoring Program Stations are referenced in the Freshet Action Plan. A table of concordance and reiteration of licensed monitoring requirements (parameters and monitoring frequency) should be considered.

3. Groundwater Monitoring Plan - Inclusion of Monitoring Program Stations

It is not clear if the revised Groundwater Management Plan makes reference to all applicable licensed Monitoring Program Stations (Schedule I of the licence).

Recommendation

The proponent should ensure that all applicable licensed Monitoring Program Stations are referenced in the Groundwater Management Plan. A table of concordance and reiteration of licensed monitoring requirements (parameters and monitoring frequency) should be considered.

Prepared by David Abernethy and Amjad Tariq