



Water Resources Division
Resource Management Directorate
Nunavut Regional Office
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Your file - Votre référence
2AM-MEA1530
Our file - Notre référence
GCDocs#134037622

March 03, 2025

Richard Dwyer
Manager of Licensing
Nunavut Water Board
P.O. Box 119
Gjoa Haven, NU, X0B 1J0
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Re: Crown-Indigenous Relations and Northern Affairs Canada's (CIRNAC) Comments to the Nunavut Water Board (NWB) on Agnico Eagle Mines Limited's February 26, 2025, regarding the Meadowbank Mine Water Transfer Line to Vault Pit for the Type A Water Licence 2AM-MEA1530.

Dear Richard Dwyer,

Following the February 20, 2025, meeting, at the request of the Nunavut Water Board, Agnico Eagle submitted a NuPPAA Section 90 Self-Assessment regarding the proposed 8 km water transfer line from Meadowbank to the Vault site. The self-assessment explained the objective of the water transfer line and provided Agnico Eagle's rationale for concluding that the proposed line does not need an assessment by the NIRB. CIRNAC appreciates and respects the due diligence work undertaken by Agnico Eagle in preparing the self-assessment and provides the following for NWB's consideration.

- a) CIRNAC suggests that Agnico Eagle has separated the construction of the water transfer line from its intended purpose, framing it as a standard water management activity within the mine's existing footprint. Agnico Eagle emphasizes that the line is part of normal operations and cites the existing 155 km of linear infrastructure at Meadowbank to support its position that this addition is not a significant change.
- b) Agnico Eagle's introduction of the potential construction of this line was made as part of the November 2024 draft Closure Plan. The draft Closure Plan was provided informally only to CIRNAC and KivIA in November 2024 for preliminary comment and discussion. As stated in the November 2024 draft Closure Plan, the purpose of the line is the one-time transfer of mill tailings reclaim water from Meadowbank In-Pit Tailings storage to Vault Pit as part of the closure program. In this regard, the proposed activity is not part of routine water management operations and standard operating procedures, nor is it simply contact water. This activity is part of the closure of the in-pit tailings facilities at Meadowbank.



- c) Although other pieces of linear infrastructure are in place at the mine and mill sites proper, there are no pipelines connecting the Vault and Meadowbank facilities. This line will be a major line carrying mill reclaim water for several years, with most of the pipeline laid along the AWAR corridor connecting the two sites rather than at the mine/mill sites proper.

It is also important to note that upon the approval of in-pit Tailings deposition at Meadowbank, the ICRP was updated to incorporate an allowance for pit water treatment due to the presence of in-pit tailings and mill effluent until the water quality in the pits met closure criteria, allowing for the reconnection of the pits to their historic water bodies.

The current proposal is to pump in-pit tailings/reclaim water that does not meet Meadowbank's closure water quality criteria to the Vault Pit for final deposition under a future freshwater cap. This is, in fact, the deposition of deleterious mill tailings-impacted materials into the Vault pit, which is to be reconnected to Wally Lake after closure. This is a significant change to the existing permit for the deposition and storage of deleterious materials.

Furthermore, Agnico Eagle indicates that the reclaimed water pumped to the Vault pit will remain isolated from the environment by placing a 15 m "clean" water cover on the top of the pit lake before reconnection with Wally Lake. Agnico Eagle has yet to demonstrate that the Vault pit will remain in a stratified meromictic condition in perpetuity.

In summary, respectfully, CIRNAC suggests that the implications of pumping tailings reclaiming water 8 km for permanent storage in the base of a reconnected pit lake do not represent routine operations. On the contrary, the proposed activity is integral to Agnico Eagle's revised closure strategy for the site, not ongoing operations.

The potential environmental impacts of these proposed changes, including the pumping and discharge of reclaimed water to the Vault pit, have yet to be assessed and approved. In this context, it is CIRNAC's opinion that approving the construction and subsequent operation of the new pipeline should be considered at the time the entire closure plan is finalized, assessed and approved.

CIRNAC looks forward to working with Agnico Eagle and engaging in meaningful discussions to address the concerns. If you have any questions or concerns, please contact me at (867) 975-4550 or Andrew.Keim@rcaanc-cirnac.gc.ca or Aminul Haque at Aminul.Haque@rcaanc-cirnac.gc.ca or (867) 975-4282

Sincerely,

Andrew Keim

Andrew Keim
Manager, Water Resources
Nunavut Regional Office