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Water Licence 2AM-MEL1631

DATE: July 6, 2026

TO: Nunavut Water Board- ATTN Richard Dwyer- Manager of Licensing

SUBJECT: Application to Amend the Type A Water Licence No: 2AM-MEL1631, issued to Agnico Eagle Mines Limited for the Meliadine Gold Project

Dear Mr. Dwyer,

Thank you for the invitation to review Agnico Eagle's Nunavut Water Board (NWB) Licence 2AM-MEL1631 Amended Application for the Type A Water Licence filed on June 2, 2026. The Kivalliq Inuit Association (KivIA) has conducted an initial review of Agnico Eagle's amendment application document package and has the following information requests which would enable to it complete their technical review of this matter.

1. Effects of traffic

The traffic frequency information still refers to the predicted traffic levels from the 2014 FEIS. The traffic frequency levels need to be updated. The fuel tanker traffic on the AWAR to transport a total of 20.0M Litres of fuel, will double from the current 9.7M litres of fuel stored on site. This is a significant increase. As well, the increased mine production will require a larger workforce and consumables to support this workforce. This will also add significantly to the traffic on the AWAR. During caribou migration, any increase in traffic and workforce will be subject to road closure protocol (as required under Levels 3 and 4 under the TEMMP).

a) Please provide the number of trips, return, for the increased fuel tanker traffic for the period of 2026-2036. This should be compared to the predicted traffic levels from the 2014 FEIS.

b) Please provide the number of trips, return, for the increased passenger vans/buses and transport trucks for the period 2026-2036. This should be compared to the to the predicted traffic levels from the 2014 FEIS.



(867) 645-5725 1-800-220-6581



(867) 645-2348



info@kivalliqinuit.ca



www.kivalliginuit.ca



c) Please provide details of how fuel trips will be scheduled between sea lift and caribou migration seasons and options for scheduling workforce shift changes during caribou migrations in the event of AWAR closures.

2. Final storage location on site for the composted organic waste

There doesn't appear to be a location provided for the final disposal location of composted organic waste on site. Can the Proponent please provide where the composted organic waste will end up being disposed off on site.

3. Tailings Management

In the Operation Report, section 3.3.4, the transit pad for tailings to be hauled underground is located within the Portal 2 Ore Pad (Figure 3.3-2). It does not appear that this area will be engineered and lined to the same specifications as the Interim Tailings Storage Pad. In this same report, the areas to store frozen tailing material to thaw until final deposition on the TSF is located near the TSF (Figure 3.3-3). It does not appear that this area will be engineered and lined to the same specifications as the Interim Tailings Storage Pad.

- a) Provide the plan for controlling the surface run-off and surface seepage from the transit pad for tailings to be hauled underground that is located within the Portal 2 Ore Pad.
- b) Provide the plan for controlling the surface run-off and surface seepage from the areas where frozen tailings material will be stored to thaw prior to final deposition on the TSF

4. Interim Tailings Storage Pad

The Interim Tailings Storage Pad is only for 'upset' conditions which include caribou migration work suspension protocol as required under Levels 3 and 4 under the TEMMP. Caribou related shutdowns have totalled 20 days in 2023.

There are no details on how the use of the transit pad will increase the surface activity of vehicles and how its use will be monitored. The Proponent should provide the following:

- a) What is the capacity transit pad in terms of number of days of average mill production?
- b) Will the transit pad be constructed with visual shielding using double sea can walls?
- c) Explain how the transit pad activity will be monitored such as with a remote camera?





5. Increased Water Use from approved water sources

In the Operation Report, section 3.3 .7.1.1 and Table 3-3.1 the increase in freshwater consumption needs is documented as 10,000 m³/year plus a 20% contingency of 2,000 m³ /year for a total of 12,000 m³ / year. This total is all attributed to Camp Use. In Appendix 5-M, the annual production of ore (Table 3.2) shows a range of 7,771,444 tonnes (2027) to 3,929,206 tonnes (2033), which significantly exceeds the 2025 annual production of 2,318,874 tonnes. The additional traffic to support transport of the increased workforce and fuel required for the expansion will lead to an increased level of dust. The additional open pits at Tiriganiaq (2026-2033), Wesmeg (226-2034), Pump (2025-2034) and F Zone (2028-2030) will also lead to an increased level of dust.

- Based on the increased production per annum please provide the freshwater consumption needs for the mill during the period of 2026-2036.
- Based on the increased traffic per annum please provide the freshwater consumption needs for dust control of these activities for the period of 2026-2036.
- Based on the increased open pit activity please provide the freshwater consumption needs for dust control of these activities for the period of 2026-2036.

6. Mill Capacity Expansion and Duration of Additional Milling Beyond 2036

In Appendix 5-M, the annual production of ore (Table 3.2) shows a range of 7,771,444 tonnes (2027) to 3,929,206 tonnes (2033), which significantly exceeds the 2025 annual production of 2,318,874 tonnes. These annual production tonnages exceed the permitted (8500 tpd) and nameplate (10,000 tpd) capacity of the current mill. In Appendix 5-M, the stockpile of ore at year end (Table 4.4) shows a range of 4,748,261 tonnes (2027) to 9,556,670 tonnes (2033). These year end stockpile tonnages exceed the permitted (8500 tpd) and nameplate (10,000 tpd) capacity of the current mill. In addition, the year end stockpile for 2036 is 6,036,061, which based on 8500 tpd and 10,000tpd would indicate an additional 1.94 to 1.65 years of milling, respectively, that would remain at the end of mine life

- Based on the increased production per annum please provide information on the possibility of a Mill Expansion.
- Based on the year end stockpile for 2036 of 6,036,061, how many additional years of milling would be required beyond the end of mine life in 2036.
- Additional years of milling beyond the end of mine life in 2036 would require that the Closure and Post-Closure timelines be modified. Please provide reasonable estimates of changes to the periods of time for the Closure and Post-Closure activities

7. Costs of Saline Water treatment

In order to evaluate the potential liabilities of increased saline storage on site, the KivIA would require the estimated cost to treat one cubic metre of saline water prior to discharge to Itivia Harbour. Please provide the estimate per cubic metre cost of treating the saline water on site.





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8. Saline Water Management and the Adaptive Management Plan

Underground saline water inflows from the Pump deposit are associated with a relatively high degree of uncertainty. In the current Adaptive Management Plan, flows from the STP, CP3, CP4, and CP5 are to be prioritized for discharge to Itivia Harbour via the saline waterline.

- a) Is the capacity of the saline waterline sufficient to allow discharge from the prioritized contact water sources with the additional underground workings?
- b) At the maximum inflow scenario, is the current infrastructure and management plans sufficient to ensure discharge to Meliadine Lake is minimized, and the higher-impact contact water sources are discharged to Itivia Harbour?

With respect to the type of technical meeting / prehearing conference to be held for this matter, KivIA recommends that the technical meeting and prehearing conference be held in Rankin Inlet and in-person but will defer to the NWB for its decision. Further, the KivIA looks forward to meeting with Agnico Eagle to assess impacts to the Water Compensation Agreement and to meeting with Agnico Eagle and CIRNAC to update the security held for the project.

Should the NWB require any further comments, I trust that you will advise.

Sincerely,

Luis Manzo P, Ag.
Director of Lands
Kivalliq Inuit Association
Tel: (867) 645-5731
dirlands@kivalliqinuit.ca