

Re: Questions - Agnico Eagle water permitting process

Chris Kanaan <chriskanaan@yahoo.com>
To: Stephanie Autut <stephanie.autut@nwb-oen.ca>
Cc: Richard Dwyer <richard.dwyer@nwb-oen.ca>

Fri, Aug 21, 2020 at 5:03 PM

Thank you Ms. Autut,

Just a couple more things that may help your team as I took a look:

In the April 2020 groundwater management plan there is no mention of the EWTP in operation.

In the 2019 annual report the only mention of the EWTP pertains to an equipment malfunction which occurred in Sept 2019 and resulted in out of compliance on TDS. I understand their SWTP was shut down for two months in Oct./Nov. due to mandatory corrective order from the Yellowknife-based WSCC which may have led them to re-start the EWTP? Speculation.

In their April 2020 groundwater management plan, the company says they will use the SWTP or EWTP to treat CP-1 water; my memory serves me that EWTP did not operate after the SWTP started in late 2018 and early 2019. This is found under 'executive summary' in the first unmarked pages.

I appreciate your response.

Respectfully

Chris Kanaan

On Friday, August 21, 2020, 06:56:59 PM EDT, Stephanie Autut <stephanie.autut@nwb-oen.ca> wrote:

Thanks Chris...I will have my team follow up on these additional questions and will get a response to you as soon as possible. Thank you.

Stephanie Autut Executive Director

Nunavut Water Board (867)222-1884 (cell, when not in Gjoa Haven) (867)360-6338, extension 22 (office line)

On Aug 21, 2020, at 4:26 PM, Chris Kanaan <chriskanaan@yahoo.com> wrote:

Hi Ms. Autut.

Your response is much appreciated, but I have a couple other questions:

- i) in Agnico Eagle's groundwater management plan which was posted on NWB around April 2020, the company said the 'underperformance' of the SWTP resulted in excess saline water on-site, without elborating;
- ii) in the #006 project ceritificate terms, Agnico Eagle is required ot notify regulators 'immediately' of anything that could put them out of compliance which certainly applies to water management. Has Nunavut Water Board considered the extended delay in reporting the SWTP failures to regulators?
- iii) Is the NWB sure that EWTP was functional in 2019? It was offline most of the time I remember after 2018.

Respectfully,

Chris Kanaan

On Friday, August 21, 2020, 05:02:49 PM EDT, Stephanie Autut <stephanie.autut@nwb-oen.ca> wrote:

Thank you for your questions. I have conferred with my Technical team here at the NWB and offer the following response. Should you have further questions, please don't hesitate to reach out by email.

Thank you.



Stephanie Autut- イCペケ ベトン

Executive Director- Directeur général

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On Mon, Aug 17, 2020 at 6:54 PM Chris Kanaan < chriskanaan@yahoo.com > wrote:

Dear Ms. Autut,

As you wrote to the Nunatsiaq News inviting questions to your personal e-mail and attention regarding your "letter to the editor" pertaining to the Meliadine water ammendment, I do have several questions that I would like to respectfully direct your way:

- i) the NWB accepted Agnico Eagle's word at par (against the will of KivIA) regarding the guality of the water and source of high TDS and high volume; given that the 2019 submissions on Agnico Eagle annual response to comments establish that their Saline Water Treatment Plant was dysunfctional from early 2019, is that something that the NWB plans to look at in retrospect? Agnico Eagle evidently did not inform the Nunavut Water Board, NIRB, or any other regulator regarding their dysfunctional SWTP until at least April 2020 in their groundwater management plan - for those like myself who studided it. It was only because CIRNAC pursued the SWTP failures that Agnico Eagle was seemingly forced into revealing the truth about the cause of high TDS.
- ii) the "Type A" water license awarded to Agnico Eagle demands the company *immediately* report anything that would put them out of compliance. Given Agnico Eagle failed to inform regulators of the dysfunctional SWTP, will this be something that the NWB investigates as a violation of their terms and conditions? Agnico Eagle could have forecasted well in advance they would face a TDS "emergency" which led to accumulated volumes as the water was "too toxic" to discharge under current terms and conditions of Type "A" water license. AEM had forecasted a rise of TDS as early as mid 2019 according to their own technical files - which I've stuided in-depths.
- iii) the NWB stated that Agnico Eagle's water is "non-toxic." What evidence or science was studied to establish such water is "non-toxic" to Meliadine Lake? Can you provide me with information on any other mine in North America or Europe that allows such levels of TDS effluent to be discharged into a freshwater lake?

As you may have read in my article in the Nunatsiag News, the Red Dog mine in Alaska was almost shutdown in 2010 for beaching 1,500 mg/L of TDS yet the Nunavut Water Board permitted Agnico Eagle to discharge up to 3,500 mg/L without any scientific evidence unique to the lake that it would not harm the local environment.

We are hearing some rumors that Agnico Eagle is going to seek a permanent discharge criteria of 3,500 mg/L for TDS into Meliadine Lake. We are concerned the process is not transparent and does not invite members of the public to provide feedback.

I would really value your feedback to my queries.

Thanks!

Chris Kanaan