



Water Resources Division
Resource Management Directorate
Nunavut Regional Office
918 Federal Road
Iqaluit, NU, X0A 3H0

Your file - Votre référence
2AM-MEL1631
Our file - Notre référence
GCDOCS#139261877

July 23, 2025

Richard Dwyer
Manager of Licensing
Nunavut Water Board
P.O. Box 119
Gjoa Haven, NU, X0B 1J0
E-mail: licensing@nwb-oen.ca

Re: Crown-Indigenous Relations and Northern Affairs Canada's Review of the Design Report for the Fuel Farm at PUMP Underground Portal for Meliadine Gold Mine Projects, Type A Water Licence 2AM-MEL1631.

Dear Mr. Dwyer,

Thank you for your June 26, 2025, invitation to review the Design Report for the Fuel Farm at PUMP02 Underground Portal for Meliadine Gold Mine Projects, submitted by Agnico Eagle Mines Limited, for Type A Water Licence 2AM-MEL1631.

Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC) reviewed the submitted design report pursuant to its responsibilities under the *Nunavut Waters and Nunavut Surface Rights Tribunal Act* and the *Department of Crown-Indigenous Relations and Northern Affairs Act*.

The proposed project involves the construction of a fuel storage and distribution facility, referred to as the Fuel Farm, at the PUMP02 Underground Portal of the Meliadine Mine site. The design includes the installation of two 75,000-litre double-walled diesel storage tanks (one to be installed initially), a fuel pumping station housed in a 40-foot container, a urea dispensing container, and associated aboveground piping and containment infrastructure. The facility is intended to support underground mining operations by supplying fuel to mobile equipment, generators, and service buildings.

CIRNAC notes that the PUMP02 portal and its associated underground activities are not currently authorized under Water Licence 2AM-MEL1631 or the corresponding Project Certificate. While Agnico Eagle has submitted a modification request under the existing water licence to include these underground activities, that request remains under review.



Although the fuel storage infrastructure is classified as support infrastructure, its primary purpose is to facilitate the yet-to-be-authorized underground development. In CIRNAC's view, it would be premature to approve this supporting infrastructure before a decision by the Nunavut Water Board (NWB) on the associated modification request. Doing so could be interpreted as implicit approval of the unapproved activity.

CIRNAC recommends that the NWB not approve the Fuel Farm Design Report until formal authorization is granted for the PUMP02 Underground Portal and its associated activities under the Water Licence. CIRNAC also reserves the right to review and comment on the Design Report following approval of the modification request, to ensure consistency with any newly established terms, conditions, or monitoring requirements.

CIRNAC emphasizes the importance of ensuring that all project components are appropriately regulated and aligned with relevant environmental and regulatory frameworks.

If there are any questions or concerns, please contact me at Aminul.Hague@rcaanc-cirnac.gc.ca or (867) 975-4282 or Andrew Keim at (867) 975-4550 or Andrew.Keim@rcaanc-cirnac.gc.ca.

Sincerely,

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Aminul Haque
Senior Environmental Assessment Specialist