



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

Your file - Votre référence
(Licence No. 2AM-MEL1631)
Our file - Notre référence
GCDocs#143846783

March 06, 2026

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 fuel farm at PUMP underground portal for the Meliadine Mine project, Type A Water Licence No. 2AM-MEL1631

Dear Richard,

Thank you for the February 16, 2026, invitation to review the referenced design report, submitted by Agnico Eagle Mines Limited under the existing Type A Water Licence No. 2AM-MEL1631.

Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC) examined the application pursuant to its mandated responsibilities under the *Nunavut Waters and Nunavut Surface Rights Tribunal Act* and the *Department of Crown-Indigenous Relations and Northern Affairs Act*. Please find CIRNAC's comments and recommendations in the attached Technical Memorandum.

The applicant shall provide confirmation from the Nunavut Water Board that all outstanding water license fees have been paid in full prior to approval of this application.

If there are any questions or concerns, please contact Jordan Beer at jordan.beer@rcaanc-cirnac.gc.ca or Andrew Keim at (867) 975-4550 or Andrew.Keim@rcaanc-cirnac.gc.ca.

Sincerely,

Jordan Beer, M.Sc.,
Water Management Coordinator



Technical Review Memorandum

Date: March 06, 2026

To: Richard Dwyer – Manager of Licensing, Nunavut Water Board

From: Jordan Beer – Water Management Coordinator, CIRNAC

Subject: Crown-Indigenous Relations and Northern Affairs Canada’s Review of the Design Report for fuel farm at PUMP underground portal for the Meliadine Mine project, Type A Water Licence No. 2AM-MEL1631

Region: Kitikmeot Kivalliq Qikiqtani

A. BACKGROUND

The Meliadine Mine project is a gold mining project run by Agnico Eagles Mining Limited (Applicant), with active operations ongoing since 2016. The mine site is located approximately 25 km north of Ranken Inlet and 80 km southwest of Chesterfield Inlet in the Kivalliq Region of Nunavut. The project exists between the latitudes of 62° 47' 52" N and 63° 2' 53" N and between the longitudes of 92° 3' 10" W and 92° 16' 19" W. The main camp is located at 63° 2' 24.180" N and 92° 13' 44.288" W.

Agnico submitted a design report for a fuel farm at the Meliadine Mine site. The proposed fuel farm includes two 75 m³ fuel tanks, one 40-foot pumping station, and one 20-foot fuel and urea dispenser. The entire fuel farm will be installed on a lined pad with an impermeable membrane, and the pad will be surrounded by lined berms. Descending ramps will provide vehicles access to the pad without breaking the containment, and contact water will be diverted to sumps within the pad footprint. The fuel farm is intended to supply diesel to mining equipment, a mobile emergency power generator and the site’s service building.

CIRNAC provides the following comments and recommendations pertaining to the application package. A summary of the subjects of recommendations can be found in Table 1. Documents reviewed as part of this submission can be found in Table 2 of Section B. Detailed technical review comments can be found in Section C.


Table 1: Summary of Recommendations

Recommendation Number	Subject
R-01	Distance from Water
R-02	Sedimentation and Erosion Controls
R-03	Containment Area Slope
R-04	Construction Monitoring
R-05	Stockpile and Laydown Areas

B. DOCUMENTS REVIEWED AND REFERENCED

The following table (Table 2) provides a list of the documents reviewed under the submission and reference during the review.

Table 2: Documents Reviewed and Referenced

Document Title	Author, File No., Rev., Date
65-PUM-400-210-000-001_R2	WSP Canada Inc., October 28 2025
65-PUM-416-205-000-001_R4	WSP Canada Inc., December 11 2025
65-PUM-416-205-000-002_R3	WSP Canada Inc., December 11 2025
65-PUM-416-205-000-003_R3	WSP Canada Inc., December 11 2025
65-PUM-416-230-000-002_R1	WSP Canada Inc., July 28 2025
65-PUM-416-230-000-003_R1	WSP Canada Inc., July 28 2025
65-PUM-416-270-000-001_R2	WSP Canada Inc., December 10 2025
65-PUM-416-270-000-002_R2	WSP Canada Inc., December 10 2025
65-PUM-416-270-000-003_R2	WSP Canada Inc., December 10 2025
65-PUM-416-270-000-004_R0	WSP Canada Inc., May 9 2025
65-PUM-416-270-000-005_R1	WSP Canada Inc., June 3 2025
65-PUM-416-270-000-006_R1	WSP Canada Inc., August 21 2025
65-PUM-416-270-000-007_R1	WSP Canada Inc., August 21 2025
65-PUM-416-270-000-008_R1	WSP Canada Inc., August 21 2025
65-PUM-416-270-000-009_R1	WSP Canada Inc., August 21 2025
65-PUM-416-270-000-010_R1	WSP Canada Inc., August 21 2025
6542-416-132-REP-001_R1.pdf	WSP Canada Inc., February 3 2026
6542-416-280-DES-001	WSP Canada Inc., February 3 2026
241025 2AM-MEL1631 Amended Licence-OASE Final	Nunavut Water Board, October 25 2024



C. RESULTS OF REVIEW

1. Distance from Water

Comment:

Figure 2 within the document “6542-416-132-REP-001_R1.pdf” (henceforth: the design report) shows the proposed location for the new Fuel Farm . Parts of the area circled appear to be within 31 m of the adjacent lake. CIRNAC is concerned that construction within 31 m of the high water mark of fresh water greatly increases the risk of spills, sedimentation, and other freshwater contamination.

Recommendation:

R-01) CIRNAC recommends that the Applicant confirm that no part of the Fuel Farm will be within 31 m from the high water mark of nearby water bodies.

2. Sedimentation and Erosion Controls

Comment:

Part D-2e of Water License 2AM-MEL1631 states that detailed reports submitted prior to Construction shall include “Technical specifications for sedimentation, erosion control and bank stabilization measures, including proposed materials, location and extent, place methods and quantities required”.

Section 4.5.3 of the design report lists the following paragraph as the erosion and sediment release control plan:

“The area will be closely observed for erosion and sediment transport throughout the construction period. Any necessary mitigation measures will be implemented in accordance with the Sediment and Erosion Management Plan.”.

No other information on erosion and sediment release control was provided. CIRNAC was unable to locate the referenced Sediment and Erosion Management Plan within the design report package or on the NWB registry. The concern is that sedimentation produced during construction activities could end up in the nearby freshwater lake unless preventative measures are taken.

Recommendation:

R-02) CIRNAC recommends that the Applicant provide a copy of the Sediment and Erosion Management Plan. CIRNAC also recommends that the Applicant specify what measures



will be taken during fuel farm construction to prevent sedimentation and erosion, including the proposed materials, location and extent, place methods and quantities required.

3. Containment Area Slope

Comment:

Part D-5a of Water License 2AM-MEL1631 states that “The Licensee shall construct and operate the Fuel Storage and Containment Facilities to meet, at a minimum, all applicable legislation and industry standards [including the] Environmental Code of Practice for Aboveground and Underground Storage Tank Systems Containing Petroleum and Allied Petroleum Products, 2003; CCME PN1326 (Updated in 2015) or most recent”.

Section 3.10.2 of the part 3 of the *Code of practice for storage tank systems containing petroleum and allied products* (CCME, 2003) states that “containment area floors within dykes shall slope away from the tank base towards a sump at a slope greater than 1%”.

Section 4.3.3 of the design report states that “The top of the pads will be leveled to ensure a minimum slope of 0.5%, allowing run off water or fuel spills to flow towards the low points of the basins, where a sump pit will be used to pump the water out”.

CIRNAC is concerned that the proposed design is not in line with the Environmental Code of Practice for Aboveground and Underground Storage Tank Systems Containing Petroleum and Allied Petroleum Products, 2003, and may not allow for adequate spill and runoff collection.

Recommendation:

R-03) CIRNAC recommends that the Applicant amend the fuel farm pad design to meet, at a minimum, all applicable legislation and industry standards including the Environmental Code of Practice for Aboveground and Underground Storage Tank Systems Containing Petroleum and Allied Petroleum Products, 2003; CCME PN1326 (Updated in 2015) or most recent standards.

References

1. Canadian Council of Ministers of the Environment. (2003). *Environmental Code of Practice for Aboveground and Underground Storage Tank Systems Containing Petroleum and Allied Petroleum Products (PN 1326)*. Canadian Council of Ministers of the Environment. <https://www.canada.ca/content/dam/eccc/documents/pdf/cepa/ccme-pn-1326-eng.pdf>



4. Construction Monitoring

Comment:

Part D-9 of Water License 2AM-MEL1631 states that “The Licensee shall conduct daily visual inspections for Construction activity during spring freshet and during and after remarkable rainfall events, with sampling of runoff/Seepage where turbidity is evident”. Construction activities are scheduled to begin in July 2026 and finish by the December 2026, therefore spring freshet should not be a concern. However, remarkable rainfall events are possible during the summer or fall.

Section 4.5.2: Construction Monitoring of the design report does not contain any measures to conduct visual inspections of the construction activity during and after remarkable rainfall events. CIRNAC is concerned that turbid runoff and seepage may not be noticed within a timely fashion, potentially resulting in erosion or sedimentation.

Recommendation:

R-04) CIRNAC recommends the applicant amend the design report to include plans to monitor the construction site during and after remarkable rainfall events, with sampling of runoff/Seepage where turbidity is evident.

5. Stockpile and Laydown Areas

Comment:

Part D-15 of Water License 2AM-MEL1631 states that “The Licensee shall designate an area for the deposition of excavated and stockpiled materials, with respect to access roads, laydown area, pad construction or other earthworks, at a distance of at least thirty-one (31) metres from the ordinary High-Water Mark, in order to prevent the deposition of debris or sediment into or onto any Water body.”

CIRNAC was unable to locate a proposed laydown and/or stockpile area for the fuel farm construction. The concern is that materials may be stockpiled within 31 m of the high water mark of the nearby lake, resulting in unnecessary sedimentation or contamination.

Recommendation:

R-05) CIRNAC recommends that the Applicant provide confirmation that any proposed laydown or stockpile areas will be at least 31 m from the high water mark of nearby water bodies.