

July 8th, 2025

Richard Dwyer
Manager of Licensing
Nunavut Water Board
P.O. Box 119 Gjoa Haven
Nunavut NU X0B 1J0

RE: *Meliadine Saline Effluent Discharge System Design Report and Drawings for 2AM-MEL1631 water licence*

Dear Mr. Dwyer,

Agnico Eagle Mines Limited (Agnico Eagle) thanks the Nunavut Water Board (NWB) for the opportunity to address comments received for Meliadine Saline Effluent Discharge System Design Report and Drawings for 2AM-MEL1631 water licence.

The following information and comments are intended to address comments outlined in the below referenced letter.






250624 2AM-MEL1631 Design Report Meliadine Saline Effluent Discharge System
CIRNA Comments-IMLE

250624 2AM-MEL1631 Design Report Meliadine Saline Effluent Discharge System DFO
Comments-IMLE

Should you have any questions or require further information, please do not hesitate to contact us.

With my best regards,



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Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC)

CIRNAC-1: APACHE PASS SECTION

Recommendation

Whether the proposed Apache Pass Section has been screened under the Nunavut Impact Review Board (NIRB) process, and if so, identify the screening decision or rationale for exemption.

If no new screening is proposed, explain how the existing NIRB Project Certificate authorizes the addition of this infrastructure.

Agnico Eagle Answer

It is unclear to Agnico Eagle why these questions are being asked, as the 2020 FEIS Addendum went through an extensive review from 2020-2022. CIRNAC was an intervenor on this file and information on the review. The approval is available on the NIRB registry.

However, to re-answer these questions, a brief summary is noted below.

This activity has been reviewed and approved through the 2020 FEIS Addendum process (i.e., the waterline). Questions on the routing were asked and answered during the NIRB hearing, and commitments were made.

The routing of the waterline, including routing around Apache Pass, went through an extensive NIRB review from 2020-2022. Therefore, yes, it has been screened by NIRB, and ultimately approved under Project Certificate No.006-Amendment 002 (March 2, 2022).

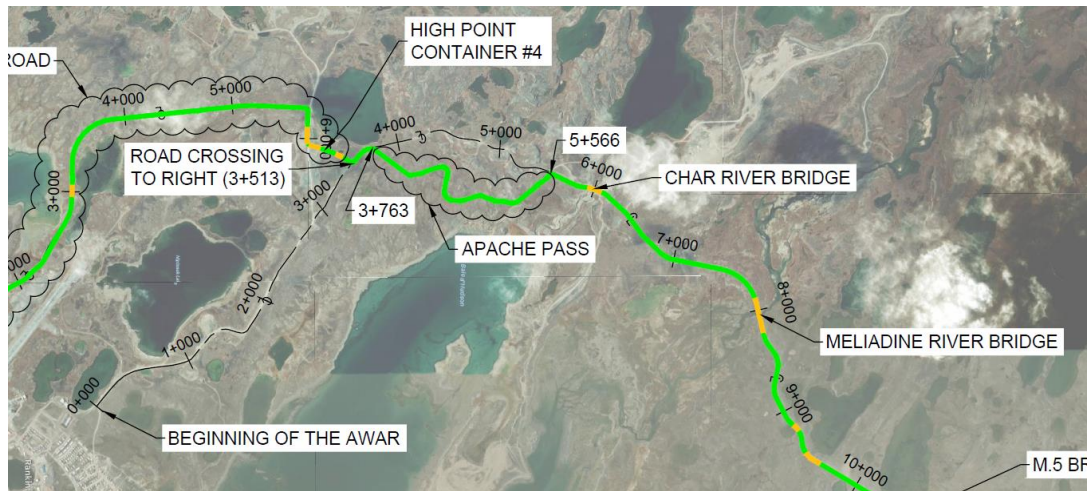
The routing around Apache Pass was requested based on community feedback. As outlined in the August 2020 FEIS Addendum, Section 5.1:

Consideration of comments received from the March 2020 community meetings were factored into the Project design, including but not limited to the following:

- *routing the waterlines in the area of Apache Pass on the East side of the rock outcrop, somewhat like the routing of the 12-inch water pipe for the Hamlet*

The routing of the waterline was communicated throughout the NIRB review process, which shows the waterline going east of the road at Apache Pass. This routing was first presented in Appendix IR-6 in response to Information Requests (snapshot shown below), and used in subsequent presentations and discussions of the NIRB process.

Further, as outlined in Exhibit 21 of the Public Hearing, this was a commitment made by Agnico Eagle (snapshot shown below) and was resolved.



Update on Consultation Commitments

No.	Feedback and commitments		Status	Comments
1	Use traditional Knowledge/IQ to identify areas for crossings structures or burying/covering locations	Elder representatives from the HTOs will be invited to site to inspect the All-Weather Access Road (AWAR) and identify locations where caribou crossing should be installed or where the waterline should be buried/covered	Resolved	Agnico Eagle used Knowledge/IQ to identify areas for crossings structures or burying/covering locations
2	Build crossing structures		N. A	Ref commitments 9 and 21 and 22 ^{new}
3	Use western science to identify areas for crossing structures	a) Collar Study b) Road observations c) Camera study of the road d) Camera study of existing waterline e) Road material study	Resolved	Continuous monitoring
4	Have a long-term monitoring study that will inform adaptive management	a) Site Visits for Elders b) Tracking Caribou with GPS collars c) Camera Study d) Road monitoring site + HTO program	Resolved	Ref. List of Commitments, No. 4, part a and b
5	Toll-free number for the community members to report problem along the waterline		Resolved	Tusaajugut Email tusaajugut@agnicoeagle.com, Toll-free at 1-844-323-3002, http://aemnunavut.ca/tusaajugut/
6	Leakage detection system on the waterline to be incorporated		Resolved	Ref. List of Commitments, No. 2
7	In the area of Apache Pass the waterlines will be routed on the East side of the rock outcrop		Resolved	The routing of the waterlines in the Apache Pass is show in Appendix 6-IA1E of the IRs response package. NIRB registry No. 201013-11MN034.
8	Markers will be placed on the waterline for winter ID		Resolved	Markers will be added at the flanges.
9	Agnico Eagle will bury/cover between 80-90% of the waterline and will continue to work with the HTO, KIA, Elders and the community on site specific locations. This will replace the commitment 2 to build crossing if this the preferred mitigation method		Resolved	The waterline design and reclamation costs were revised to include this commitment.

Finally, Agnico Eagle has the approval and subsequent lease with the Government of Nunavut that allows for the waterline routing around the Apache Pass. This Lease is not authorized until the project is approved by the NIRB; therefore, again demonstrating that the routing of the waterline around Apache Pass was reviewed and approved through NIRB.

CIRNAC-2: DECOMMISSIONING

Recommendation

Provide information on the decommissioning strategy for the proposed service road and culverts once the Saline Effluent Discharge System is no longer in operation. This should include required updates to the Interim Closure and Reclamation Plan, as well as any associated updates to the financial security estimates to account for these additional elements.

Agnico Eagle Answer

As described in the Interim Closure and Reclamation Plan, culverts along roads will be dismantled. Natural stream flow and drainage patterns will be restored as much as possible and stream banks will be stabilized by using rip-rap. Road embankment will be regraded, and surfaces will be restored with natural/compatible terrain as much as possible. Other infrastructures along the road will be dismantled. Upon local interest and regulatory approval, roads could be transferred to the local community.

Additionally, the waterline is included in the security estimate.

Fisheries and Oceans Canada (DFO)

DFO-1: CULVERT INSTALLATION

Comment

The Design Plan proposes the installation of 10 culverts with a diameter of 1000 mm to allow drainage of the low points of the terrain through the barrier formed by the road embankment.

Based on the description, it is uncertain if these culverts will provide connectivity between larger waterbodies during freshet, high rainfall, or high flow events, and/or if these culverts will potentially provide passage for fish.

Recommendation

To clarify if any of these culverts:

1. Will connect larger waterbodies during freshet, high rainfall, and/or high flow events, and
2. If any of these culverts would have potential to provide passage for fish.

Agnico Eagle Answer

The culverts do not connect waterbodies or provide fish passage. Their primary function is to manage roadside drainage and prevent water accumulation.