

## Richard Dwyer <richard.dwyer@nwb-oen.ca>

## **RE: Quarries MP**

Wilson3, Christine (AADNC/AANDC) < christine.wilson3@canada.ca>

Fri, May 25, 2018 at 11:17 AM

To: Dan Gorton <a href="mailto:square"><a href="mailto:square">dan.gorton@agnicoeagle.com</a>, Meliadine Environment Supervisors <a href="mailto:square"><a href="mailto:square">dan.gorton@agnicoeagle.com</a>, Meliadine Environment

<meli.environment@agnicoeagle.com>

Cc: "NWB Licensing@nwb-oen.ca)" licensing@nwb-oen.ca>, "Parsons, Ian (AADNC/AANDC)" <ian.parsons@canada.ca>

Hey Dan,

I engaged the NWB in a discussion yesterday and I wished to share the response as it clarified my concerns regarding submissions, approvals and implementation of plans; more specifically, the 2018 Borrow Pits and Quarry Management Plan as discussed May 24<sup>th</sup>.

"As per Part B Item 15

The Licensee shall review the Plans or Manuals referred to in this Licence as required by changes in operation and/or technology and modify the Plans or Manuals accordingly. Revisions to the Plans or Manuals should incorporate design changes and adaptive engineering required and implemented during Construction and on the basis of actual site conditions and monitoring results over the life of the Project, and are to be submitted in the form of an Addendum to be included with the Annual Report required by Part B, Item 2, complete with a revisions list detailing where significant content changes are made.

Although the idea is to have any updates due to operations and technologies changes to be included as an addendum, however, very often Licensees provide the full updated Plans within the Annual Report.

Part B Item 12 states

...Any changes to the plans deemed significant shall be considered as an amendment to the plan(s) or as a modification and must be submitted for approval by the Board in writing.

This means significant changes to the plans will require a fully amended plan that must be approved by the Board in advance as per the same term of licence the plans shall be implemented as approved by the Board in writing.

These are standard requirements for Type "A" licences.

I agree that there may be a misunderstanding for the Licensees, when fully modified plans are submitted within the Annual Report that are for Boards approval while the Addenda within Annual Report are not for

Board	approval.	If Applic	ant subm	ts a sigr	nificantly	modified	d Plan	within	the A	Annual	Report,	there	could b	е
situatio	ons when t	the Plan v	vas create	d and in	nplement	ted alrea	dy with	hout be	ing a	approve	d. This	is why	the ful	ly
update	d or revis	ed plans	shall be	submitte	d indepe	endently	from A	Annual	Rep	ort in a	dvance	of cha	anges o	n
site."														

(...)

I reviewed the BPQMP 2018 plan and found it to respect PART B item 15. I will base my inspection off that plan therefore accepting it as a revised version of the approved BPQMP 2015 plan.

Please let me know if there is any part of this email that you wish to discuss. Also if there is any plan that was submitted with the 2017 Annual report that is new or would include signification changes please review PART B of water licence no. 2AM-MEL1631.

Thank you again for your assistance and cooperation during the inspection.

Regards,

Christine

From: Dan Gorton [mailto:dan.gorton@agnicoeagle.com]

**Sent:** Thursday, May 24, 2018 3:38 PM **To:** Wilson3, Christine (AADNC/AANDC)

Subject: Quarries MP

Hi Christine,

As requested.

**Thanks** 

## Dan Gorton Environmental Coordinator

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