



July 20, 2018

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

**Re: Crown - Indigenous Relations and Northern Affairs Canada's (CIRNAC) Review of  
Agnico Eagle Mines Limited's Groundwater Management Plan – Version 2 - Water  
Licence 2AM-MEL1631 - Meliadine Gold Project**

Dear Richard Dwyer,

Provided is Agnico Eagle's response to the comments and recommendations received by the Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC) regarding their review of the Meliadine Project's submission of the Groundwater Management Plan – Version 2.

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

Regards,

A handwritten signature in blue ink, appearing to read "J Huza". The signature is fluid and cursive, with the first letter of the last name being a large, stylized 'H'.

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General Supervisor Environment

## 1) P-Area

**Comment:** In section 3.2 of the Groundwater Management plan, the P1- P3 areas are listed as structures used to store groundwater, however, there is no mention of the P-Area in the 2AMMEL1631 Water Licence or application.

Summary on the P-Area: In 2016 AEM notified Nunavut Water Board (NWB) that during a review of the data from the Annual report they observed elevated levels of calcium chloride, ammonia and nitrates in A54 Lake (Peanut Lake), located downstream of the portal. Agnico Eagles Mines Ltd. (AEM) determined that run off from the waste rock pile stored on the surface at the portal was the main cause of the elevated concentrations and constructed the P-Area to control run off from the waste rock pile under the 2BB-MEL water licence.

Later in 2017 it was determined that the P-Area frozen core berms were not properly constructed to contain waste water, as freeze back was never achieved and seepage was observed. CIRNAC understands that these structures and activity is currently captured under the 2BB-MEL licence and not the 2AM-MEL1631 licence.

**Recommendation:** NWB should consider requesting an amendment for this activity to allow for proper review.

### **Agnico Eagle's Response:**

*As noted, these activities are licenced under the 2BB-MEL licence and have been reviewed in accordance with applicable Nunavut Water Board processes. Agnico Eagle does not agree it is necessary to apply for an amendment to 2AM MEL1631 for an activity that is already licenced.*

*It is Agnico Eagle's intent to pursue an amendment to the 2AM-MEL1631 water license in 2022 for other purposes. If it has been determined at that time that there is a need to keep the P-area long-term (beyond 2022), Agnico Eagle will give consideration to this comment as part of this license amendment.*

## 2) General Clarification

**Comment:** In Section 3.4 of the current groundwater management plan (GWMP) being reviewed for approval is requested for the short and long term strategy identified in the GWMP. This is contradicted in section 3.4.1, where AEM states "These short-term storage and treatment options are being implemented at the Mine pending regulatory approvals for the long-term groundwater management option."

However, the 2AM-MEL1631 Water License states:

*"The Licensee shall submit a Groundwater Management Plan to the Board for approval in writing, at least six (6) months prior to the discharge of any Groundwater. The Plan shall take into consideration all comments raised and commitments made with respect to submissions*

*received during the technical review of the Application as well as final submissions and issues raised during the Public Hearing Process, where applicable.”*

CIRNAC is of the opinion that this plan has not yet been approved and therefore what is stated in the plan should not be implemented until such time that approval for this plan is granted.

**Recommendation:** AEM should confirm to the NWB exactly what is being implemented at this time at site, and whether or not it is allowed under the current licence.

**Agnico Eagle’s Response:**

*All current activities implemented at this time are permitted under the current licence. Agnico Eagle requests NWB approval of the plan on or before August 15, 2018 so that Agnico Eagle can proceed with the activities outlined in the plan.*

*The reference above (“The plan will take into consideration all comments raised and commitments made...” ) was related to the original water license hearing. The submission of the GWMP to the Nunavut Water Board was on February 15, 2018.*

*Currently on site, the surface water ponds (CP1 and CP5) are managing surface contact water. Waste rock brought to surface contains a small percentage of water that will generally drain over time and report mainly to the P-area and CP5. CP5 water is treated by an RO prior to transferring the treated water to CP1. An effluent water treatment plant (EWTP) treats the water contained in CP1 for TSS removal prior to environmental discharge.*

*The P-area contains surface runoff from both natural sources and from waste rock. Additionally, excess underground water is transferred to the P-area for evaporation. The P-area is fully contained within the contact water footprint. The contact water footprint is managed by CP5 and CP1. No water from the underground mine is being sent to CP1 (nor CP5) for environmental discharge and therefore Agnico Eagle is compliant with the clause from the 2AM-MEL1631 being:*

*“The Licensee shall submit a Groundwater Management Plan to the Board for approval in writing, at least six (6) months prior to the discharge of any Groundwater.”*

**3) Additional Comments**

**Comment:** Two different Water Management Plans (2015a and 2017) are referenced in the GWMP. CIRNAC was not able to confirm which of these WMP are actually approved. As the NWB explained: plans that are submitted with the initial application should be considered the approved plan and as changes in operation or improvements in technology occur a revised version may be provided with the Annual Report. Plans that contain significant changes (e.g.:

WMP that incorporates infrastructure and processes which have never been discussed in the application process) must be approved before implementation.

**Recommendation:** Confirm and or clarify which plan is approved.

**Agnico Eagle's Response:**

*Both plans have been approved as per NWB regulatory process and the most recent is the 2017 WMP. We note there is also a 2018 WMP that has been submitted to the NWB but is not yet approved. Agnico Eagle requests approval of the 2018 WMP by August 15 2018.*

**Comment:** The P-Area was identified in a document titled "AEM Meliadine- Elevated TDS Levels in CP1 April 16 2018" as a structure which has been seeping into CP1, causing elevated TDS levels. Due to these elevated levels of TDS, the release of effluent from the CP1 into Meliadine Lake was stopped during the fall of 2017, subsequently causing AEM to carry water over the winter until a proper treatment method could be found. During the winter of 2017/2018 AEM brought in a Reverse Osmosis water treatment plant unit (RO unit). This plant will be used to treat the contaminated water in CP1 and CP5 prior to release. The by-product of the RO unit is a brine water solution. AEM has proposed to deposit this brine water into the P-area.

**Recommendation:** Again, it looks as if two licences are being used interchangeably here. CIRNAC would like clarification on which licence this undertaking falls under. We believe that if AEM wishes to incorporate infrastructure from the 2BB-MEL licence into the 2AM-MEL1631 Water Management plan, then an application for amendment should be submitted so that proper review of all activities may take place.

**Agnico Eagle's Response:**

*Again, all activities are licenced and have been subject to NWB review.*

*The final control structures are DCP1 and DCP5. All other structures including culverts direct flow or contain water to ensure we do not impact the environment outside of our control structure for contact water.*

*Should the need to keep the P-area operational long-term be determined, Agnico Eagle will give consideration to this comment as part of the upcoming 2AM-MEL1631 license amendment planned for 2022.*