

July 20, 2018

Richard Dwyer

Manager of Licensing

Nunavut Water Board

P.O. Box 119

Gjoa Haven, NU X0B 1J0

Re: Environment and Climate Change Canada (ECCC) 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 Environment and Climate Change Canada (ECCC) 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,

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**General Supervisor Environment** 

## **Errata**

1. Section 2.4 (Mine Development Plan) indicates that Phase 2 will be "8 years for Mine Operations, beginning in 2017 and ending in 2027". Phase 2 should be shown as beginning in 2019 or 2020.

**Recommendation:** ECCC recommends that Agnico Eagle Mines Ltd. (the Proponent) correct the year in which Phase 2 begins.

## Agnico Eagle's Response:

This has been updated in the document. See the attached revised Groundwater Management Plan.

## **Marine Discharges**

- 2. Section 3.4.3 (Potential Future Long-Term Management Strategy Treated Groundwater Discharge to Melvin Bay at Itivia Harbour) notes that discharge to the ocean would have to meet criteria under the *Metal Mining Effluent Regulations* or the amended version. ECCC confirms that the *Metal and Diamond Mining Effluent Regulations (MDMER)* came into force on June 1st, 2018 and will be applicable to discharges to Melvin Bay. The consolidated MDMER is available at: http://laws-lois.justice.gc.ca/eng/regulations/SOR-2002-222/index.html (note that many of the relevant changes are found in the text following the legislation under "Related Provisions", including the revised discharge criteria for Schedule 4 Table 2).
- 3. Section 4.3 (Water Quality) states that "Water samples will be analyzed for the following parameters: conductivity, TDS, pH, temperature, major anions, radium 226, dissolved and total metals and toxicity testing. Water quality results are compared to MMER and SSWQO guidelines and will be compliant prior to discharging to Meliadine Lake." Given that there is no direct discharge to Meliadine Lake without treatment, this section should include the qualifier "compliant after treatment". In addition, it is not clear whether "major anions" includes ammonia.

**Recommendation:** ECCC recommends that the proponent:

- a) include "compliant after treatment" in Section 4.3 as noted above; and
- b) clarify whether major anions is intended to include ammonia

## Agnico Eagle's Response:

Both items a) and b) have been updated in the document. For item b) ammonia has been added to the list.

See the attached revised Groundwater Management Plan.