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2AM-MEL1631-Meliadine Gold Mine Project; Agnico Eagle Mines Limited; Notice of Modification Comment Summaries and NWB Guidance Regarding Next Steps

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Tue, Sep 2, 2025 at 5:21 PM

To: "karen.kharatyan@nwb-oen.ca" <karen.kharatyan@nwb-oen.ca>
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Good day, Karén

In response to the letter from the Nunavut Water Board on August 20, 2025 requesting clarification in relation to the proposed modification to the Meliadine Gold Mine Project, as NPC determined the modification activities did not require screening, and was not referred to the NIRB for assessment, the NIRB does not have any application from Agnico Eagle Mines Limited submitted to NIRB specifically. Therefore, the following clarifications and observations by the NIRB are based solely on the material submitted to the NWB and NPC and our review of the NIRB assessments of the original Meliadine Mine and subsequent amendment and the existing terms and conditions of Project Certificate No. 006 which governs the Project. In that regard, we provide the following clarifications:

- 1. As noted by NPC, the proposed activities do not increase the footprint of the Project. Further, the activities proposed are not novel for the site in that underground mining and saline water storage were previously assessed by the NIRB and these activities are already in progress at the site.
- 2. As also noted by NPC, while the Project Certificate lists Tiriganiaq as the only deposit that was specifically planned to use underground mining at the time the project proposal was originally submitted to the NIRB and provided the basis for the NIRB's 2014 assessment, both the Final Environmental Impact Assessment (FEIS) reviewed by the NIRB and the NIRB Final Hearing Report Project identified the possibility of underground mining for the other deposits:

"It should be noted that all deposits remain open at depth, so UG [underground] mining cannot be ruled out for any of the deposits at this point in the Project life." FEIS p. 1-12

"The open pits would be flooded once the operation in each pit is completed and the potential for underground operations in the pit has been dismissed." NIRB Final Hearing Report, p. 30

3. Saline water storage is already taking place in constructed ponds on site. As the NIRB has indicated in relation to the Meliadine site and also the Meadowbank site, using exhausted open pits for saline water storage rather than other types of uses is not generally considered sufficient to change the Board's assessment of potential

impacts associated with the operation and reclamation of a mining project and trigger a Project Certificate reconsideration.

Given the above, the NIRB has concluded that undertaking the proposed modification activities does not, on its face, appear to require changes to the existing Terms and Conditions for this project. However, based on the information reviewed, the Board could not determine whether or not the potential increase in groundwater input as a result of the proposed activities in the permafrost at Pump could result in a significant increase in the amount of saline water that would need to be discharged. Agnico Eagle is advised that if the amount of saline water to be discharged through the waterlines would exceed 12,000 m³/day of treated saline effluent and a combined total 20,000 m³/day of all water through the waterlines during the allowed discharge period (Term and Condition 25), then an amendment to the Project Certificate would be required.

Assuming that no amendment to Term and Condition 25 is required, upon the NWB completing their consideration of the Modification Request and if the NWB approves the modification activities to proceed, parties are reminded that any resulting updates to management plans that are provided to the NIRB under the Project Certificate should be submitted to the NIRB within 30 days of the completion of the updates. In addition, the NIRB also expects that any information/observations regarding operational changes resulting from the modification activities should also be discussed in the Proponent's Annual Report provided to the NIRB.



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Sent: August 20, 2025 2:27 PM

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Subject: [EXTERNAL] 2AM-MEL1631-Meliadine Gold Mine Project; Agnico Eagle Mines Limited; Notice of Modification Comment Summaries and NWB Guidance Regarding Next Steps

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	Good afternoon,	
	Please see attached.	The Nunavut Water Board requests a response from NPC and NIRB by August 29, 2025.
Richard	Regards,	
	Richard	