

Water Licence 2AM-MEL1631

TO: Karén Kharatyan, Director, Technical Services, NWB

DATE: August 31, 2025

**SUBJECT: KIA technical comments on Water Licence 2AM-MEL1631
Modification – Shallow Pump Underground Development within
Permafrost and Water Storage in Pits**

Dear Mr. Kharatyan,

The KIA has reviewed Agnico Eagle's Modification request Shallow Pump Underground Development within Permafrost and Water Storage in Pits and has the following technical comments:

1) Use of Mined Out Pits to store saline water

There still exists uncertainty on the impact on permafrost from the storage of saline water in mined out open pits. Therefore, the KIA requests that additional thermal and hydrogeological studies be completed in the immediate area of the open pits planned for saline water storage.

2) Pump Underground Workings

The deepest portion of the proposed Pump underground development will be very close to the deepest extent of known permafrost. The proposed underground workings will introduce warm air into the permafrost through the mine ventilation system and the daily mining activities, so there is a reasonable possibility that permafrost could degrade and intersect with the saline water that is currently below the known limits of the permafrost. Therefore, the KIA requests that additional thermal and hydrogeological studies be completed in the immediate area of the proposed underground workings to determine the impact of underground mining on permafrost integrity. The “lessons learned” from the underground mining at the Tiriganiaq gold deposit could help inform the potential impacts of the proposed Pump underground workings.

3) Saline Water at Closure

Please confirm that all saline water will be removed from the site at closure, either by discharge to Itivva Harbour or discharge into the completed underground workings.

4) Security at the Meliadine Project

Long term storage of saline water in pits was not contemplated in the current security assessment for the Meliadine Project. Additional security will be required to cover these activities.

The KIA thanks the NWB for the opportunity to comment on this review. Please reach out if any further information/clarification is required.

Sincerely,

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