



Water Resources Division
Resource Management Directorate
Nunavut Regional Office
918 Nunavut Drive
Iqaluit, NU, X0A 3H0

Your file - Votre référence
2AM-MEL1631
Our file - Notre référence
GCDOCS#140784721

October 09, 2025

Richard Dwyer
Manager of Licensing
Nunavut Water Board
P.O. Box 119
Gjoa Haven, NU, X0B 1J0
E-mail: licensing@nwb-oen.ca

Re: Crown-Indigenous Relations and Northern Affairs Canada's Reply to Agnico Eagle's Response to Review Comments on the 2025 Modification Request for the Meliadine Mine Project, Type A Water Licence No 2AM-MEL1631.

Dear Richard,

Thank you for your September 24, 2025, invitation to review Agnico Eagle's response to review comments on the 2025 Modification Request for the Meliadine Mine Project, Type A Water Licence No 2AM-MEL1631.

Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC) examined the application pursuant to its mandated responsibilities under the *Nunavut Waters and Nunavut Surface Rights Tribunal Act* and the *Department of Crown-Indigenous Relations and Northern Affairs Act*.

CIRNAC acknowledges the Nunavut Water Board's (NWB's) September 5, 2025, determination that the modification request, including the PUMP02 underground portal, temporary waste rock storage, and use of mined-out pits for saline and contact water storage, falls within the scope of the existing Project Certificate No. 006 and Type A Water Licence 2AM-MEL1631, and that these activities may proceed.

The development of additional underground workings and the repurposing of mined-out pits for saline water management introduce new or modified reclamation and environmental liabilities that must be fully reflected in the site's security estimate to ensure compliance with section 76(1) of the *Nunavut Waters and Nunavut Surface Rights Tribunal Act*. Specifically, the proposed activities may alter the mine's closure liability profile in the following ways:



- The PUMP02 underground portal and associated surface disturbance will require sealing, backfilling, and long-term stability monitoring not previously accounted for.
- The use of pits for saline water storage adds long-term geochemical and hydrological uncertainty, potentially requiring extended water quality monitoring, permafrost stabilization, or contingency treatment measures.

CIRNAC therefore recommends that the NWB request that Agnico Eagle undertake a targeted security review to confirm that the posted financial security remains sufficient to address these incremental liabilities. The review should include:

- A comparison between the current reclamation cost estimate and the new modification activities;
- Identification of any additional closure obligations introduced by the PUMP02 portal and saline pit storage; and
- Confirmation that the updated cost estimate remains protective and in line with closure obligations under the licence.

CIRNAC emphasizes that this security review is not intended to delay the approved modification, but rather to ensure that financial assurances remain consistent with the evolving project scope and the precautionary intent of the *Nunavut Waters and Nunavut Surface Rights Tribunal Act*.

If there are any questions or concerns, please contact me at (867) 975-4550 or Andrew.Keim@rcaanc-cirnac.gc.ca.

Sincerely,

Andrew Keim

Andrew Keim
Manager, Water Resources