



Water Resources Division
Resource Management Directorate
Nunavut Regional Office
P.O. Box 100
Iqaluit, NU, X0A 0H0

Your file - Votre référence
2AM-MEL1631
Our file - Notre référence
GCdocs #99319047

December 1, 2021

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

Re: Crown-Indigenous Relations and Northern Affairs Canada's (CIRNAC's) Reply to Agnico Eagle Mines (AEM's) Response on Review of Updated April 7, 2021 Meliadine Mine Interim Closure and Reclamation Plan (ICRP) for Type "A" Water Licence No. 2AM-MEL1631

Dear Mr. Dwyer,

Thank you for your November 25, 2021 invitation to reply to AEM's response to CIRNAC's Review comments on the updated April 7, 2021 ICRP for Type "A" Water Licence No. 2AM-MEL1631

CIRNAC-02: Review of the Updated Rev.03 ICRP April 2021

Recommendation: CIRNAC recommends adding a specific bullet to this part of the ICRP stating the need for the waterline decommissioning.

AEM's Response: Agnico Eagle thanks CIRNAC for their comment and as stated in Agnico Eagle's answer to KivlA's Comment 5, clarifications will be added to the next version of the ICRP on this matter.

CIRNAC is satisfied with AEM's response to include clarifications on waterline decommissioning in the next version of the ICRP.



CIRNAC-03: Review of Attachments to Updated Rev 3 ICRP April 2021

- i. **Appendix-D Recommendation:** No issues or concerns with information provided. CIRNAC would suggest AEM ensure that any “lessons learned” are researched or captured to generate the table.

AEM’s Response: As stated in Agnico Eagle’s answer to KivIA’s Comment 2, lessons Learned from Other Projects will be reviewed and updated as applicable in the next version of the ICRP.

CIRNAC is satisfied with AEM’s response to capture/review and update lessons learned from other projects as applicable in the next version of the ICRP.

- ii. **Appendix-E Recommendation:** While CIRNAC has no issues or concerns with the information provided, CIRNAC notes that the information is quite dated. CIRNAC expects that more recent information could be provided on the research items identified and would like to know if there are any more areas of research that have been undertaken or committed to by AEM.

AEM’s Response: Agnico Eagle thanks CIRNAC for their comment and will update the information in Appendix E within the next version of the ICRP.

CIRNAC is satisfied with AEM’s response to update the information in Appendix E in the next version of the ICRP.

- iii. **Appendix-F Recommendations:** The inclusion of photographs are positive but lack context. AEM should:

- Provide recent 2020 or 2021 photographs.
- Label photos to orient reader to the site.
- Add photographs of primary features that will be of special interest to closure such as the waste rock storage areas, the mill tailings area, pits and portals, etc.
- Include a site plan as a cross reference to illustrate where the photos are being taken from and the field of view of each photo.

AEM’s Response: Agnico Eagle thanks CIRNAC for their comment and will take these points into consideration for the next version of the ICRP.

CIRNAC is satisfied with AEM’s response to consider the points raised by CIRNAC for inclusion in the next version of the ICRP.



- iv. **Appendix-G Recommendation:** Monitoring stations do not appear to have changed from the latest water licence locations. A figure should be included to show where station MEL-SR12 is located along the Bypass Road and another figure to show the location of MEL-26 at Melvin Bay. Station MEL-25 should be added to Figure 7.

AEM's Response: Agnico Eagle thanks CIRNAC for their comment and will update Appendix G accordingly in the next version of the ICRP.

CIRNAC is satisfied with AEM's response to update Appendix G accordingly in the next version of the ICRP.

- v. **Appendix-M Recommendation:** The schedule is consistent with the discussion of Section 8.0 and Table 8.1. CIRNAC has no issues or concerns with the information provided other than to note that the schedule does not reflect a 25-year post-closure monitoring period as recommended.

AEM's Response: Agnico Eagle thanks CIRNAC for their comment and refers CIRNAC to the Meliadine Security Management Agreement signed between CIRNAC and Agnico Eagle for the Meliadine Project. This agreement refers to a 10 years post-closure period.

CIRNAC requests that Agnico Eagle Mines (AEM) provide the signed Meliadine Security Management Agreement (SMA) between CIRNAC and AEM confirming a 10-year post-closure monitoring period

- vi. **Appendix-O Recommendation:** No concerns with the plans provided. Recognizing continued evaluation of those work elements remaining to be constructed will be required. For example, the design plans for the water line between the mine and Itivia Bay will need to be reviewed once the issued for construction set is available. Note that for some of the design plans, the implementation phase will be over the life of the mine and as such will be subject to annual or more frequent inspections per the conditions outlined in the existing water licence amendment (for example the construction of the waste rock storage facility).

AEM's Response: Agnico Eagle thanks CIRNAC for their comment. Agnico Eagle will continue to submit Design and As-Built reports and to conduct inspections of infrastructures as applicable under Type A Amended Water Licence 2AM-MEL1631.

CIRNAC is satisfied with AEM's response.



CIRNAC appreciates the opportunity to participate in this review. If there are any questions, please contact John Onita at john.onita@rcaanc-cirnac.gc.ca; or (867) 975-3876 or Andrew Keim at (867) 975-4550 or andrew.keim@rcaanc-cirnac.gc.ca

Sincerely,

John Onita
Regional Water Coordinator