

November 23, 2018

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**RE: WHALE TAIL PIT PROJECT NIRB File No. 18MN047  
RESPONSE TO NIRB LETTER DATED NOVEMBER 16, 2018 and SUBMISSION OF THE  
WHALE TAIL PIT EXPANSION PROJECT FINAL ENVIRONMENTAL IMPACT STATEMENT  
ADDENDUM**

Dear Mr. Barry and Ms. Autut:

Agnico Eagle appreciates the comments received from NIRB on November 16<sup>th</sup>, 2018 and the opportunity to clarify the project description and also provide to NIRB the Whale Tail Pit Expansion Project Final Environmental Impact Statement (FEIS) Addendum that includes:

- the IVR Pit,
- IVR Waste Rock Facility,
- IVR Attenuation Pond, and
- Underground mine (collectively, the Whale Tail Pit Expansion Assets).

As per instructions provided by NIRB in the letter dated November 16<sup>th</sup>, 2018, Agnico Eagle has uploaded a complete and final Whale Tail Pit Expansion Project FEIS Addendum to the NIRB portal. More specifically, the FEIS includes Volume 1 through Volume 8 that are a series of complementary documents to provide a full understanding of the consultation, technical and scientific aspects of the Whale Tail Pit Expansion Project :

- Volume 1 – Project Description;
- Volume 2 - FEIS Addendum Overview;
- Volume 3 – Assessment Methods;
- Volume 4 – Atmospheric Environment;
- Volume 5 – Terrestrial Environment;
- Volume 6 – Freshwater Environment;
- Volume 7 – Human Environment; and
- Volume 8 – Monitoring, Mitigation, and Management Plans.

In addition, Agnico Eagle has attached Table 1 as a response to NIRBs “Appendix A: Discrepancies noted in November 1, 2018 Project Description” that was part of the NIRB letter dated November 16<sup>th</sup>, 2018. We trust this table and the complete Whale Tail Pit FEIS Addendum addresses the discrepancies noted by NIRB.

We are looking forward to receiving a timely determination of the coordinated process timelines with the NWB, and commencing the reconsideration process with NIRB immediately. If you require any further information or additional clarification to this application, please contact the undersigned via email or telephone.

Regards,



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**Response to NIRBs "Guidance for the NIRB's Assessment of Agnico Eagle Mines Limited's "Whale Tail Pit Expansion Project" Proposal, dated November 16, 2018**

No.	Page	Chapter Title	Questions	Responses
1	i	Plain Language Summary	<p>"...Agnico Eagle proposes to mine for an additional four years for a total of 15.2 million tonnes of ore."</p> <p>Clarification required as Table 1.2-1C notes that the total ore to be mined would be for a total of 23.5 million tonnes of ore and text under page 16 notes that the Expansion Project mine operations will generate approximately 15.2 Mt of tailings.</p>	<p>For clarification, Table 1.2-1 and statement in the Plain Language Summary are correct. The Expansion Project is projected to yield 15.2 Mt of ore. The Expansion Project combined (15.2 MT of ore) combined with projected amount of ore for the approved project (8.3 Mt of ore) totals a combined ore for the Whale Tail Pit Expansion Project if approved would be 23.5 Mt of ore.</p> <p>Language on page 16 reflects the summary data provided in the subsequent tables. The summary total reflects 15.2 Mt of ore mined and 15.2 Mt ore processed/tailings produced.</p>
2	vi	Executive Summary	Information required on how much the Whale Tail open pit would be expanded by.	The Whale Tail Pit expansion is further described in the FEIS Addendum (Volume 5, Appendix 5-E). In summary, Whale Tail Pit will be expanded to extract an additional 100.4 Mt of ore and waste rock. Refer to Section 1.2.2.1
3	vi;3	Executive Summary; Table 1.1-1 (site access)	Additional information is required on why Agnico Eagle is proposing to upgrade the haul road from 9.5 metres to 15 metres in width. Application notes "for safety reasons" but this is not sufficient as it does not appear that the volume of trucks on the road would be changing.	Efficiency of traffic movement on the haul road is dictated by safety. In 2018, Agnico Eagle conducted an assessment which included field trials with the long haul trucks to determine optimal safety, efficiency and production of hauling from Whale Tail Pit. It has been determined that a 15 m road width would allow long haul trucks to pass each other safely, which a 9.5 m road width does not allow. Furthermore, during wintertime, snow tends to pile up on one side of the road and, as such, the proposed

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				expansion will improve driving conditions. Refer to Section 1.2.8 of the Project Description.
4	vi	Executive Summary	<p>Noted that transportation to the mine site including marine barging would remain the same as authorized. Need further clarification as additional fuel tanks are being developed at the Baker Lake Fuel Storage Facility which means that additional fuel would be delivered/year. Additional barges might be needed for the construction phases. Currently, the total number of barges (fuel and cargo) averages to about 37/year (2017 Meadowbank Annual Report).</p>	<p>To clarify, additional tanks are being built under the current Meadowbank Type A Water Licence (2AM-MEA1826) to support current operations needs associated with the Approved Project. As this activity was occurring at the time of our submission of this application, we stated no additional tanks would be developed. Mitigation of impacts related to any potential increase (if any) in shipping for the Approved Project would be monitored under the current Project Certificate.</p>
5	vii & 18	Executive Summary & Processed Ore Containment (Tailings Storage Facility)	<p>Agnico Eagle noted that tailings would be stored at the existing Meadowbank Mine Tailings Storage Facility as approved by NIRB Project Certificate No. 008; however, the In-Pit Tailings Storage Facility Amendment to the Meadowbank Project indicated that the tailings storage facility has shown an increase in seepage at the downstream toe of the Central Dike. If the In- Pit Tailings Storage Facility Amendment is not approved by the Minister, how will Agnico Eagle deal with the current issues observed with additional tailings to be stored in the tailings storage facility as an additional 15.2 million tonnes of tailings would be produced from the Expansion Project on top of the 8.3 million tonnes predicted for the original Whale Tail Pit Project?</p> <p>On page 18, Agnico Eagle noted that "...Agnico Eagle proposes to process the ore resulting from the expansion at the existing Meadowbank Mine and dispose of the tailings in the approved Tailings Storage</p>	<p>Agnico Eagle thanks NIRB for this question. We would like to clarify that the expansion application is a reconsideration of Whale Tail Pit Project Certificate No.008, not the Meadowbank Project Certificate No. 004. As the approved Meadowbank tailings storage facility capacity under Type A 2AM MEA1526 is sufficient for storage of Meadowbank and Whale Tail Pit tailings to 2023, upon acceptance of the inpit disposal, the TSF will provide greater flexibility, safer and increased storage capacity to accommodate the expansion proposed.</p> <p>As discussed previously with intervenors, Agnico Eagle would like to clarify that the Central Dike seepage does not impact dike performance. The seepage is below the foundation (i.e., in the bedrock) and is not part of the dike structure itself and will permit storage until 2023 or an additional 8.3 million tonnes, as per the approved</p>

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			Facility (TSF), .... No consequential amendments to Project Certificate No. 004 are needed at this time (Addendum Volume 2).” As noted above, currently there is an amendment with the Minister for approval to discharge tailings from the processing plant into 3 pits (in-pit tailings disposal) to accommodate the additional tailings to be processed from Whale Tail. How will Agnico Eagle deal with the consequences if the In-Pit Tailings Disposal Modification is not approved?	projects. The NIRB is correct in noting challenges in the in-pit approval process has caused; not receiving approval for in-pit disposal in a timely fashion may cause increased challenges for safe disposal of tailings. Options evaluated in the Meadowbank Tailings Storage Facility Multiple Accounts Analysis identified in-pit as the best option based on capacity to store tailings, best technology and environmental protection, which will accommodate the additional 15.2 million tonnes required for the expansion. If in-pit disposal is not approved, secondary or tertiary options evaluated in the MAA will be evaluated and could be implemented for milling and storage of tailings for the Whale Tail Pit expansion, beyond 2023 to accommodate the expansion.
6	1	Project Definition	Clarification is required with respect to the comment “Agnico Eagle believes the scope of the Project defined in the Approved Project FEIS (Agnico Eagle 2016) has not changed significantly with the proposed expansion...”. The expansion of the Whale Tail Pit, a second pit with associated infrastructure, dewatering of additional lakes, underground operations and additional quarry sites were not part of the original scope of the project. In addition, the expansion of the haul road to 15 metres was not part of the original scope.	As part of the cover letter provided with the application on November 1st, 2018, Agnico Eagle has completed a self-assessment of the scope changes with NuPPAA Section 90 as per NIRB guidance. Outcomes of this assessment show that this expansion project will not cause significant adverse effects and that proposed changes mainly relates to waste and water potential impacts. Please refer to the FEIS Addendum (Volumes 2 to 8) for documentation supporting this conclusion.
7	2	Figure 1.1-1	Figure notes that Meadowbank Mine to Whale Tail road is 71.5 km long. However, the Whale Tail Pit Project states that the road is 64.1 km long. Clarification is required on the difference in length regarding the haul road.	For clarification, 64.1 km represents the distance between Whale Tail and Vault Pit, which is part of the Whale Tail Pit approved project, but does not include the Vault Haul Road. Seventy one and a half kilometers (71.5 km) is the distance between Whale Tail Pit and Meadowbank Mine.

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8	4	Table 1.1-1 (On-site facilities)	Why are the on-site facilities for the Whale Tail Pit expanding to accommodate a maximum of 390 persons from the approved 210 people at the main camp?	NIRB is correct. Agnico Eagle is proposing the addition of four (4) wings to accommodate an additional 390 employees, mainly to support underground operations. The proposal to expand the accommodation camp to 390 is reflective of the high-end of a potential temporary peak in workforce requirements during operation.
9	4	Table 1.1-1 (On-site facilities)	Further information is required on the inclusion of an incinerator, compost site and landfarm. Why was it not considered for the original Whale Tail Pit Project?	Agnico Eagle thanks NIRB for the opportunity to clarify this. Agnico Eagle proposes to add an incinerator, a composter, and a landfarm on-site to reduce traffic on the haul road and to improve waste and contaminated soil management. Reduced traffic will result in less interactions with caribou and safer road conditions. Refer to Section 1.2.13 of the Project Description.
10	6	Table 1.1-1 (ore stockpile)	The Expansion Proposal indicate that the ore-stock piles will be consistent with the Approved Project, and ore will be stockpiled in a series of stockpiles located adjacent to the pits. However, there are additional ore stockpiles for IVR located next to the Whale Tail Pit as noted in Figure 1.2-1. The statement contradicts the figure.	<p>Agnico does not believe that the statement contradicts the figure. As illustrated in Figure 1.2-1, ore will primarily be stockpiled adjacent to the Whale Tail Pit.</p> <p>The additional stockpiles are proposed to facilitate blending of ore types and will be used only temporarily in support of above-mentioned permanent stockpiles. Agnico Eagle would like to reiterate that our intent is to store ore efficiently and with minimal impact to the environment. Refer to Section 1.2.2.2 of the Project Description.</p>
11	9; 26 & 14	Table 1.1-1 (fuel and hazardous wastes) Figure 1.2-1	The Expansion proposal indicates that the “approved Bulk Fuel Storage Facility will be expanded for an additional 0.5 million litre tank” (page 9) and further indicates that “fuel storage at the Whale Tail site will be in one above ground storage tank with	NIRB is correct, the reference to 5,000,000 L is an error in the text. For clarification, Agnico Eagle was approved to store 500,000 L of diesel fuel under NWB Licence 2AM-WTP1826 to support open pit activities and 1,900,000 L of diesel fuel

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			<p>approximately 5,000,000 L capacity and one above ground storage tank with approximately 500,000 L capacity” (page 26).</p> <p>However, the original Whale Tail Pit Project proposal indicated that the “[f]uel storage at the Whale Tail site will be in one above ground storage tank with approximately 500,000 L capacity” (page 1-33, Volume 1, Project Description, Whale Tail Pit Proposal). This was also confirmed during the PHC and Final Hearing presentation by Agnico Eagle for the Whale Tail Pit Project. So, from the above, it appears that for the Expansion project Agnico Eagle is proposing to add 5,000,000 L (5 ML) of fuel at the Whale Tail Pit site not 500,000 litres (0.5 ML). Clarification is required on the differences in numbers. In addition, Figure 1.2-1 shows an additional storage area for fuel located at the Vent Raise WHL #2 for a total of 200,000 litres (4x50000 litres). Clarification is requested with respect to this additional fuel storage area.</p>	<p>under NWB Licence 2BB-MEA1828 to support underground development and exploration activities. Under License 2AM-WTP1826, Agnico Eagle adjusted the size of the fuel tank to one 1,500,000 L tank which was included with our 60 day notice to NWB.</p> <p>As part of the proposed Whale Tail Pit Expansion Project, Agnico Eagle is proposing to add: one above ground storage tank with approximately 500,000 L capacity within the vicinity of the current Whale Tail Pit Fuel Farm and 700,000 L storage capacity between five (5) key storage locations illustrated in Figure 1.2-1 (i.e., close to vent raises, TDS treatment plant and cement re-filling plants). In total, the proposed fuel storage capacity required for the Approved Whale Tail Pit Project and the Expansion Project is a total of 2.7 million litres.</p>
12	10	Table 1.1-1 (employment)	<p>“additional 390 jobs will be created with the Expansion Project”</p> <p>Further information on this number is required. Will this be construction or during operations? Is this in addition the proposed additional 931 people on rotation during operations for the original Whale Tail Project?</p>	<p>Agnico Eagle would clarify this statement to reflect that, while the proposed expansion of the camp accommodation is designed to accommodate up to 390 additional workers, the average annual additional employment positions created by the Expansion Project over and above those created by the Approved Project is 235. Average annual employment is reported for the purpose of the FEIS to avoid overstating or understating the employment benefit of the Project. Total operational employment fluctuates to a small degree with varying activities on-site.</p>

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				As a result, there may be temporary peak periods of activity wherein total employment is greater than the average annual used for the purpose of the economic assessment. The proposal to expand the accommodation camp to 390 is reflective of the high-end of a potential temporary peak in workforce requirements. For additional information refer to Volume 7, Section 7.4.1.
13	12-13	1.1.6 Consultation	<p>“...only an updated record of consultation including government engagement undertaken since June 2016 is provided in Addendum Volume 2.”</p> <p>This means that Agnico Eagle consulted the communities, RA and stakeholders on the proposed expansion/amendment while undergoing a review of the Whale Tail Pit Project (started September 2016). This most likely added to the confusion for the public to understand the current approved project and the proposed expansion. More information will be needed from Agnico Eagle on their consultation process, how they ensured that there was minimal confusion between presenting the original Whale Tail Pit project and the proposed expansion project. How comments were received and noted to be related to the original Whale Tail Pit Project or to the expansion proposal, etc.</p>	<p>Consultation undertaken by Agnico Eagle is further described in FEIS Addendum (Volume 2, Section 2 and Volume 7).</p> <p>Consistent with the Approved Project, Agnico Eagle has taken a holistic approach to collecting IQ for the Expansion Project through the LOM and is illustrated in Volume 2, Figure 2-1. Additional IQ and Project-related concerns and issues have been provided by community members and representatives (i.e., Hunters and Trappers Organization and Kivalliq Inuit Association) since the FEIS submission was made in 2016 for the Approved Project. This information was identified through a review of the consultation record for the Approved Project and community consultation notes for the Expansion Project. The IQ and Expansion Project concerns have been categorised by topic (e.g., wildlife, fish, water quality) and are included in each respective discipline sections, and integrated into the assessment, where appropriate. The expansion concerns and mitigation measures are also listed in Addendum Appendix 2-D, Table 2-D-2.</p>



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14	16-17	Deposit, Mining Methods and Production of Whale Tail Pit (Table 1.2-1C)	Table 1.2-1C shows an increase in ore mined between 2021 and 2024 compared to other years. Will the amount of trucks transporting the ore between the Whale Tail Pit site and Meadowbank increase to accommodate the increase in ore mined? Will the ore be stored in the stockpiles at Meadowbank until processed or stored in stockpiles at the Whale Tail Pit site? Provide the estimate traffic numbers for the haul road if the numbers are going to be different from the approved Whale Tail Pit Project.	<p>The haul road traffic volumes for the Expansion Project are consistent with those applied to the Approved Project. Daily vehicle traffic on the haul road is shown in Volume 4, Appendix B, Table 4-B-20.</p> <p>In addition, the Approved Project, assumed that long haul trucks "daily vehicle passages" on the haul road would be 154 trucks per day on average and up to 173 trucks per day. (Volume 4, Appendix 4.B-8, Table 4-B-15). The average and upper limit number of long haul trucks has not changed for the Expansion Project as compared to the Approved Project, as it is based on a maximum throughput at the mill of 9,000 to 12,000 t/day.</p> <p>Ore will be stockpiled at both Meadowbank and Whale Tail Pit sites.</p>
15	i, ii, vi, 3, 7, 19, 22, 24		Certain sections note that the Expansion Proposal is for three to six more years (operation) while other sections note three to four more years. Clarify the discrepancies in numbers.	<p>Refer to FEIS Addendum (Volume 3, Section 3.3, Figure 3.1-1) to understand the timeline for the project Approved vs. Expansion.</p> <p>For clarity in the Project Description Agnico Eagle has inserted "Years" to represent the approximate timelines of activities. These "Years" are consistent with the figure identified above and list of activities provided in Table 1.4-1.</p>