

APPROVED PROJECT MANAGEMENT PLANS	CIRNAC [INAC] Comments from Approved Project November 2016 Completeness Review	Agnico Eagle Response to Information Requests (January 2017)	CIRNAC [INAC] Comments from Approved Project December 2016 Information Request	Agnico Eagle Response to Information Requests (January 2017)	CIRNAC [INAC] Comments from Approved Project March 2017 Technical Comments	Agnico Eagle Response to Technical Comments (April 2017)	CIRNAC [INAC] Comments from Approved Project August 2017 Final Written Statements	Agnico Eagle Response to Final Written Statements (August 2017)
1) CREMP Addendum Mercury Monitoring Plan	not applicable - no request made for this Plan	not applicable	Search of "mercury" in INACs December 22, 2016 IR document: - no matches	not applicable	Search of "mercury and CREMP" in INACs March 28, 2017 TC document: - no matches	not applicable	Search of "mercury and CREMP" in INACs August 14, 2017 FWS document: - no matches	not applicable
2) Haul Road Management Plan	not applicable - no request made for this Plan	not applicable	Search of "Haul Road" in INACs December 22, 2016 IR document: - no matches	not applicable	Search of "Haul Road" in INACs March 28, 2017 TC document: - no matches	not applicable	Search of "Haul Road" in INACs August 14, 2017 FWS document: - no matches	not applicable
3) Water Quality and Flow Monitoring Plan	AEM is to provide a set of management plans exclusively for the Whale Tail Pit project to support the new Type A water licence application	Stand-alone Whale Tail Management Plan created for the Whale Tail Pit Project and submitted in January 2017	Search of "quality and flow" in INACs December 22, 2016 IR document: - no matches	not applicable	Search of "quality and flow" in INACs March 28, 2017 TC document: - no matches	not applicable	Search of "quality and flow" in INACs August 14, 2017 FWS document: - no matches	not applicable
4) Water Management Plan	AEM is to provide a set of management plans exclusively for the Whale Tail Pit project to support the new Type A water licence application	Stand-alone Whale Tail Management Plan created for the Whale Tail Pit Project and submitted in January 2017	Search of "water management plan" in INACs December 22, 2016 IR document: - no matches	[INAC-IR2,c] Additionally, site-wide water balance information and modelled predictions of water quality in the pit lake will be updated as part of the licence requirements to update the Water Management Plan.	Search of "water management plan" in INACs March 28, 2017 TC document: - no matches	not applicable	[INAC-FC-1,b]. Conduct Hydrodynamic Modelling of Seepage Discharges: INAC recommends that the Applicant conduct detailed hydrodynamic modelling to evaluate the mixing of WRSF seepage discharges to Mammoth Lake during the post-closure phase of the project. The modelling should evaluate a range of potential seepage discharge scenarios (clean/contaminated cover, increased active zone depth, etc.). Any results from the modelling should be incorporated into the appropriate monitoring plan for review and approval. Search of "water management plan" in INACs August 14, 2017 FWS	[INAC-FC-1,b] Agnico Eagle agrees with INACs recommendation to conduct detailed hydrodynamic modelling of the WRSF contact water mixing into Mammoth Lake post-closure to evaluate the effects on water quality in Mammoth Lake. This will be completed for scenarios of cover contamination with north wall ultramafic rock previously considered (Golder 2017) and for active layer depth ranges observed at Meadowbank WRSF. Results of this model will inform future closure and post closure water management planning which will be incorporated into the appropriate Monitoring Plans to be submitted 60 days prior to operations.

APPROVED PROJECT MANAGEMENT PLANS	NIRB Term and Condition Management Plan (March 2018)	NWB Decision on Management Plan (October 2018)	CIRNAC Comments from Approved Project November 2018 - Fulfillment of Terms and Conditions	Agnico Response (November 2018)	Revisions Presented in Response to Expansion Project NIRB Technical Comments (May 2019)	Location in Expansion Project WL Management Plan (May 2019 Plans)
1) CREMP Addendum Mercury Monitoring Plan	Term and Condition #63 (PC No. 008) The Proponent shall conduct additional studies as part of its freshwater aquatic effects analyses to ensure that methylmercury concentrations anticipated to increase during operations in the aquatic environment (including in fish tissue) do not exceed regulatory requirements. In addition, the Proponent shall consider assessing potential risks from consumption of fish containing methylmercury by using Health Canada's hazard quotients as a descriptive tool.	Part I, Item 5: 5. The Licensee shall submit to the Board for approval and implementation, within sixty (60) days of the approval of the Licence by the Minister, a Mercury Monitoring Studies Program. The Program shall include all comments and recommendations provided during the technical review of Application.	not applicable - no comments from CIRNAC	not applicable		
					Added to Plan based on other Intervenor Requests: Added Mid-field station A76.	Section 2.1
					Added to Plan based on other Intervenor Requests: Added Small-bodied fish tissue analysis.	Section 2.3.2
					Added to Plan based on other Intervenor Requests: Added Information on analytical methods.	Section 3.0
2) Haul Road Management Plan	Terms and Conditions related to the haul road are related to atmospheric and terrestrial environments	Part b, Item 15. Within sixty (60) days of approval of this Licence by the Minister, the Licensee shall submit to the Board, for approval in writing, the following updated management plans. The updates are to take into account commitments made with respect to submissions received during the technical review of the Application, as well as final submissions and issues raised during the 2017-2018 Public Hearing process, where applicable. a. Whale Tail Pit Haul Road Management Plan, Version 1 (June 2016);	not applicable - no comments from CIRNAC	not applicable	Added to Plan based on other Intervenor Requests: Added Depth profile confirmatory sampling in 2019.	Section 3.1
					Based on other Intervenor Requests: Removal of 6:1 slope conceptual design as this type of soil has never been encountered so far.	Section 7.7.1
					Added to Plan based on other Intervenor Requests: Addition of 4:1 slope conceptual design when backfill height is greater than 3 m to allow wildlife passage and ensure safety of users.	Section 7.7.1
3) Water Quality and Flow Monitoring Plan	Term and Condition #17 (PC No. 008) The Proponent shall: a) Monitor the effects of project activities and infrastructure on surface water quality conditions; b) Ensure the monitoring data is sufficient to compare the impact predictions in the Environmental Impact Statement (EIS) for the Project with actual monitoring results; c) Ensure that the sampling locations and frequency of monitoring is consistent with and reflects the requirements of the Water Quality and Flow Plan and the Core Receiving Environmental Monitoring Program; and d) On an annual basis, the Proponent will compare monitoring results with the impact assessment predictions in the EIS and will identify any significant	Part I, Item 4: The Licensee shall implement the Whale Tail Pit Water Quality and Flow Monitoring Plan, Version 2, dated May 2017, as approved by the Board.	not applicable - no comments from CIRNAC	not applicable		
					Added to Plan based on other Intervenor Requests: Update of contact and non-contact water sampling locations (e.g., GSP ponds).	Section 2.3 Section 3.1
4) Water Management Plan	Term and Condition #6 (PC No. 008) The Proponent shall: a) Conduct detailed hydrodynamic modelling during operations and closure to evaluate the mixing of the Waste Rock Storage Facility seepage into Mammoth Lake post-closure; and b) Based on the results of the modelling implement monitoring programs and adaptive management strategies that minimize the need for active intervention, including long-term treatment of mine contact water.	Term and Condition #6 (PC No. 008) The Proponent shall: a) Conduct detailed hydrodynamic modelling during operations and closure to evaluate the mixing of the Waste Rock Storage Facility seepage into Mammoth Lake post-closure; and b) Based on the results of the modelling implement monitoring programs and adaptive management strategies that minimize the need for active intervention, including long-term treatment of mine contact water.				Section 3.3
	Term and Condition #18 (PC No. 008) The Proponent shall, reflecting any direction from the Nunavut Water Board, maintain a Site Water Monitoring and Management Plan designed to: ⊗ Minimize the amount of water that contacts mine ore and wastes; ⊗ Appropriately manage all contact water and discharges to protect local aquatic resources; and ⊗ Implement water conservation and recycling to maximize water reuse and minimize the use of natural waters. The Plan should include monitoring that demonstrates contact water (runoff and shallow groundwater) from the ore storage and waste rock storage areas is captured and managed, as per the Waste Rock Facility Management Plan.	Term and Condition #18 (PC No. 008) The Proponent shall, reflecting any direction from the Nunavut Water Board, maintain a Site Water Monitoring and Management Plan designed to: ⊗ Minimize the amount of water that contacts mine ore and wastes; ⊗ Appropriately manage all contact water and discharges to protect local aquatic resources; and ⊗ Implement water conservation and recycling to maximize water reuse and minimize the use of natural waters. The Plan should include monitoring that demonstrates contact water (runoff and shallow groundwater) from the ore storage and waste rock storage areas is captured and managed, as per the Waste Rock Facility Management Plan.	4) Mitigation Measures and Adaptive Management In the October 17 and 18, 2018 meeting with AEM, it was agreed that AEM would provide options available for mitigation if arsenic concerns materialized. AEM would incorporate these mitigation measures in the plans. The current version of the plans lacks this information. Further, the NIRB Project Certificate Term and Condition #15 further requires that the plans include: "thresholds that will trigger the implementation of adaptive management strategies that reflect site-specific conditions encountered at the project site." CIRNAC supports the NIRB requirement for thresholds which are requirements of the adaptive management process to mitigate uncertainties and address emerging conditions. CIRNAC maintains that the establishment of thresholds and the identification of the mitigation measures available would the thresholds be met need to be presented by AEM in their management and monitoring plans. The current version of the plans lack this information. As agreed the monitoring plans need to be updated to incorporate mitigative measures (including thresholds) that AEM would be able to use in the event that arsenic levels are trending higher than predicted in the Whale Tail Pit or the WRSF effluent.	As NIRB Project Certificate No.008 Term and Condition #15 is linked to the Groundwater Monitoring Plan, Agnico Eagle is referring CIRNAC to the Groundwater Monitoring Plan for arsenic thresholds.		
					Text modified to reflect the range of performance scenarios for arsenic concentration seepage from the WRSF and proposed mixing zones in surface water receivers.	Section 3.1.4.4 Section 3.3
					Included results of the updated Water Balance and Water Quality Forecast for the Project Expansion.	Section 3.4 Appendix B
					Included results of updated hydrogeological assessment.	Section 2.1.2.2
					Included results of Landform water balance for the WRSFs.	Section 3.1.4.5

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5) Waste Rock Management Plan	AEM is to provide a set of management plans exclusively for the Whale Tail Pit project to support the new Type A water licence application	Stand-alone Whale Tail Management Plan created for the Whale Tail Pit Project and submitted in January 2017	Search of "waste rock management plan" in INACs December 22, 2016 IR document: - no matches	not applicable	[INAC-TRC#1] A contingency plan for placement of additional cover, or alternative contingencies, should be developed in the event that future monitoring and assessment indicate the selected design will not prevent thawing below the cover.	As a contingency plan, the East WRSF (Figure INAC-TRC-1-1) will be used to store the NPAG and NML waste rock. This material will be used to complete the top cover of the WRSF after the operation but can also be used to increase the thickness of the cover on the slopes in the eventuality the active layer is deeper than currently expected. With such amount of material (5.7 Mm3), the cover should achieve to a maximum thickness of 7 to 8 meters, considering the requirement in material to close other project facilities (i.e., pads). This contingency will be outlined in an updated Waste Rock Storage Facility Management Plan due to the NWB prior to construction.	not applicable	[INAC-FC-4] Agnico Eagle acknowledges that based information provided by Agnico Eagle (April 2017 Technical Comment Response INAC-TRC #1), INAC supports the conclusion that sufficient clean waste rock is available to construct the conceptual cover specified in the EIS (i.e., a cover that is 2 to 4 m thick) with sufficient contingency for design modifications.
							[INAC-FC#1,a] WRSF Cover: INAC recommends the Proponent update the waste rock management plans to reduce potential for cover contamination. The updated plans should include an ongoing monitoring program to ensure appropriate rock characterization and management practices are implemented. Results from the monitoring program should be submitted in the Annual Report and also used in seepage quality model revisions. The updated monitoring plan should be provided as part of the water licensing process.	Agnico Eagle agrees with INAC's recommendations. Agnico Eagle proposes that specifics to modelling updates, waste rock monitoring frequency, sampling locations, water quality triggers and reporting frequency be detailed in revisions to the Management Plans that will be submitted 60 days prior to operations. The Waste Rock Storage Facility Management Plan (Agnico Eagle 2017), will include details of the steps involved in waste rock management planning to segregate and store waste rock in its correct location outlined in Golder (2017). Additionally, sampling may include, but not limited to, the following: • Periodic inspection and sampling of waste rock targeted for use as cover material to verify and document the composition of the material
							[INAC-FC#1,b] WRSF Seepage Management: Based on the uncertainties regarding the likelihood of poor WRSF seepage quality and the severity of the potential impacts should contamination happen, INAC recommends the Proponent revise its seepage monitoring plans to ensure prolonged and intensive monitoring of the WRSF seepage. In addition, the updated monitoring plans should include detailed evaluation of the risks associated with WRSF seepage described above and contingency plans with appropriate mitigation measures to ensure seepage water quality postclosure remains below effluent discharge criteria. The updated monitoring plan should be provided as part of the water licensing process.	Agnico Eagle agrees with INACs recommendation to conduct detailed hydrodynamic modelling of the WRSF contact water mixing into Mammoth Lake post-closure to evaluate the effects on water quality in Mammoth Lake. This will be completed for scenarios of cover contamination with north wall ultramafic rock previously considered (Golder 2017) and for active layer depth ranges observed at Meadowbank WRSF. Results of this model will inform future closure and post closure water management planning which will be incorporated into the appropriate Monitoring Plans to be submitted 60 days prior to operations.
							[INAC-FC-6] Meadowbank Tailings Management: INAC recommends that the Applicant submit a stand-alone revised and updated tailings management plan for review and approval under the Meadowbank Water Licence 2AM-MEA1525. The plan should include but not be limited to: confirmation of capacity of the facility, details on how increase tailing loadings from Whale Tail will not have any adverse effects on the facility and details on the increase in berm height of the South Cell	Agnico Eagle agrees with the INAC recommendation and submitted a stand-alone Meadowbank Tailings Management Plan on January 25, 2017 to the NWB entitled Appendix WT – Meadowbank Tailings Management Plan, Whale Tail Pit. Agnico Eagle will also submit an updated and stand-alone Meadowbank Mine Waste Rock Storage Facility Plan that will be required, 60 days following approval of the amended Meadowbank Water Licence 2AM-MEA1525.
6) Operation ARD-ML Sampling and Testing Plan	AEM is to provide a set of management plans exclusively for the Whale Tail Pit project to support the new Type A water licence application	Stand-alone Whale Tail Management Plan created for the Whale Tail Pit Project and submitted in January 2017	Search of "testing plan; ARD-ML;" in INACs December 22, 2016 IR document: - no matches	not applicable	Search of "testing plan; ARD-ML; ARD/ML" in INACs March 28, 2017 TC document: - no matches	not applicable	[INAC-FC#1,a] WRSF Cover: INAC recommends the Proponent update the waste rock management plans to reduce potential for cover contamination. The updated plans should include an ongoing monitoring program to ensure appropriate rock characterization and management practices are implemented. Results from the monitoring program should be submitted in the Annual Report and also used in seepage quality model revisions. The updated monitoring plan should be provided as part of the water licensing process.	Agnico Eagle agrees with the INAC's recommendations and will adhere to the ARD/ML Testing and Sampling Plan (EIS Volume 8, Appendix 8.E-5), Waste Rock Storage Facility Management Plan (EIS Volume 8, Appendix 8-A.1), Water Management Plan (EIS Volume 8, Appendix 8-B.2), and Water Quality and Flow Monitoring Plan (EIS Volume 8, Appendix 8-B.3) during construction, operations, and closure to inform adaptive management at the Whale Tail Pit Project. Details of the steps involved in waste rock management planning to segregate and store waste rock in its correct location outlined in Golder (2017) will be included in the update to the Waste Rock Management Plan (Agnico Eagle 2017), as well as updates to the other Management Plans to be submitted 60 days prior to operations.

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5) Waste Rock Management Plan					Updated NPAG waste rock tonnage required for the construction of the Whale Tail WRSF for the 4.7 m thermal cover.	Section 2.5
	Term and Condition #7 (PC No. 008) Prior to commencement of mining of the Whale Tail deposit, and in consultation with applicable regulatory agencies, including Natural Resources Canada, the Proponent shall as part of a Mine Waste Rock and Tailings Management Plan that reflects site-specific geological and geochemical conditions: a) Develop and implement monitoring programs for the Tailings Storage Facility and the Waste Rock Storage Facility at the Whale Tail Pit; b) Establish thresholds that will trigger the requirement for the Proponent to implement adaptive management strategies to minimize the potential for impacts from these Facilities; and c) Identify the adaptive management strategies that will be used by the Proponent		2) Waste Rock Segregation Plan CIRNAC and AEM agree that based on AEM's model predictions, the waste rock storage facility (WRSF) cover needs to be at least 4.7 meter thick and be constructed with 100% "clean" waste rocks (i.e. Non Potential Acid Generation (NPAG) and Non Metal Leaching (NML) waste rocks) or be contaminant-free (i.e. free of any Potential Acid Generation (PAG) waste rocks and free of any Metal Leaching (ML) waste rocks). The Whale Tail Waste Rock Management Plan needs to be developed such that, if implemented, no PAG waste rocks or ML waste rocks would be misidentified and misplaced in the cover. AEM has set a high standard for "clean" waste rock for the Whale Tail project WRSF cover. However, AEM continues to submit the Meadowbank Waste Rock Segregation plan which	As discussed previously, we feel the best format is to have this segregation plan in one location as it will be easier to update if required. For your reference, please find below the excerpt from initial Agnico Eagle response to CIRNAC: Agnico Eagle [...] refers CIRNAC to the ARD-ML Sampling and Testing Plan Appendix B "Flow Chart for Waste Rock delineation and segregation" shown below. Step 4: Rock segregation and management gives implementable details on how the two (2) different types of waste (i.e. NPAG and NML and PAG and/or ML) will be disposed of during Operations. Agnico Eagle would like to clarify that waste rock segregation is not based only on rock type or lithology but rather on operational ARD-ML testing results. [...] Agnico Eagle requests the NWB to make a final decision on this as this question has already been responded to CIRNAC multiple times.		Section 3.2 Appendix B of the Operational ARD-ML Sampling and Testing Plan
	Term and Condition #6 (PC No. 008) The Proponent shall: a) Conduct detailed hydrodynamic modelling during operations and closure to evaluate the mixing of the Waste Rock Storage Facility seepage into Mammoth Lake post-closure; and b) Based on the results of the modelling implement monitoring programs and adaptive management strategies that minimize the need for active intervention, including long-term treatment of mine contact water.	Part E, Items 7 and 8: 7. The Licensee shall submit an updated Water Management Plan on an annual basis to the Board for review following the commencement of Operations. The Plan must include an updated Water Balance. The Water Management Plan shall include an action plan to be implemented if predicted re-flooded pit water quality indicates that treatment is necessary. 8. The Licensee shall submit a Water Quality Model for pit re-flooding and for WRSF contact water mixing into Mammoth Lake post-Closure as part of the Water Management Plan which shall be re-calibrated as necessary and updated annually following commencement of Operations. The results and implications of the predictive model shall be reported to the Board.				Section 9.3
		Part b, Item 15. Within sixty (60) days of approval of this Licence by the Minister, the Licensee shall submit to the Board, for approval in writing, the following updated management plans. The updates are to take into account commitments made with respect to submissions received during the technical review of the Application, as well as final submissions and issues raised during the 2017-2018 Public Hearing process, where applicable. a. Whale Tail Pit Haul Road Management Plan, Version 1 (June 2016); b. Whale Tail Pit Waste Rock Management Plan, Version 1 (January 2017); c. Whale Tail Pit Water Management Plan, Version 1 (January 2017); and d. Mercury Monitoring Studies Program.				
					Added to Plan based on other Intervenor Requests: Corrected duration of construction and operation phase.	Section 3.2
					Added to Plan based on other Intervenor Requests: Corrected date of completion of hydrodynamic modelling.	Section 9.3
6) Operation ARD-ML Sampling and Testing Plan	Term and Condition #8 (PC No. 008) The Proponent shall submit a detailed Acid Rock Drainage and Metal Leaching Management Plan that includes the following items: 1) Waste rock segregation and testing; 2) Thermal monitoring of waste rock; 3) Seepage management and monitoring; 4) A schedule for reporting of results and periodic updating of predictions for the WRSF pond quality; 5) Planning for optimal cover conditions; 6) Contingency measures that may be implemented if required; 7) Plans for comparing monitoring results from receiving waters to model predictions; and 8) The identification of thresholds that will trigger management actions if trends analysis indicates water quality objectives may be exceeded.	Part B, Item 13: 13. The Licensee shall implement the following Plans also required under the Type "A" Water Licence 2AM-MEA1526 as approved (or accepted) by the Board. Any future updates to these Plans approved (or accepted) under the Type "A" Water Licence 2AM-MEA1526 or this Licence shall be applicable to both 2AM-MEA1526 and 2AM-WTP1826 Licences. Any changes to the plans deemed significant shall be considered as an amendment to the Plan(s) or as a modification and must be approved by the Board. i. Operational ARD/ML Testing and Sampling Plan, Version WT (June 2016)^;	2) Waste Rock Segregation Plan CIRNAC and AEM agree that based on AEM's model predictions, the waste rock storage facility (WRSF) cover needs to be at least 4.7 meter thick and be constructed with 100% "clean" waste rocks (i.e. Non Potential Acid Generation (NPAG) and Non Metal Leaching (NML) waste rocks) or be contaminant-free (i.e. free of any Potential Acid Generation (PAG) waste rocks and free of any Metal Leaching (ML) waste rocks). The Whale Tail Waste Rock Management Plan needs to be developed such that, if implemented, no PAG waste rocks or ML waste rocks would be misidentified and misplaced in the cover. AEM has set a high standard for "clean" waste rock for the Whale Tail project WRSF cover. However, AEM continues to submit the Meadowbank Waste Rock Segregation plan which CIRNAC has made clear is not site specific to the Whale Tail Pit project geology and geochemical concerns. AEM acknowledges that waste rocks from the Whale Tail pit have much higher metal leaching potentials than those from the Meadowbank pits. CIRNAC	As discussed previously, we feel the best format is to have this segregation plan in one location as it will be easier to update if required. For your reference, please find below the excerpt from initial Agnico Eagle response to CIRNAC: Agnico Eagle [...] refers CIRNAC to the ARD-ML Sampling and Testing Plan Appendix B "Flow Chart for Waste Rock delineation and segregation" shown below. Step 4: Rock segregation and management gives implementable details on how the two (2) different types of waste (i.e. NPAG and NML and PAG and/or ML) will be disposed of during Operations. Agnico Eagle would like to clarify that waste rock segregation is not based only on rock type or lithology but rather on operational ARD-ML testing results. [...] Agnico Eagle requests the NWB to make a final decision on this as this question has already been responded to CIRNAC multiple times.	Updated the Adaptive Management actions to prevent and manage any potential contamination of the WRSF cover failure modes and events approach. Added reference to the ARD/ML Sampling and Testing Plan, for Adaptive Management actions.	Section 2.2 Section 3.4 Section 5.0 Appendix B
					Added to Plan based on other Intervenor Requests: Additional details on the sampling and segregation procedures and QA-QC practices in place.	Section 3.2.3 Section 3.4
					Added to Plan based on other Intervenor Requests: Updated results of the hydrogeological, water quality and geochemical data at Whale Tail Pit.	Section 4.2.1

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7) Groundwater Monitoring Plan	AEM is to provide a set of management plans exclusively for the Whale Tail Pit project to support the new Type A water licence application	Stand-alone Whale Tail Management Plan created for the Whale Tail Pit Project and submitted in January 2017	Search of "groundwater monitoring plan" in INACs December 22, 2016 IR document: - no matches	not applicable	Search of "groundwater; Monitoring Plan; hydrogeo" in INACs March 28, 2017 TC document: - no matches	not applicable	<p>[INAC-FC#3a]. Perform Hydrogeological Characterization Studies: INAC recommends that additional hydrogeological characterization studies be performed to address uncertainties and to validate the Applicant's current conclusions regarding hydraulic gradients and arsenic diffusion potential. INAC has looked at the proposed schedule of activities at Whale Tail and interprets there to be enough time during the 2018 field season to undertake these studies prior to the dewatering of Whale Tail Lake and the development of the pit. The studies will serve as an important pre-development baseline and will help to address current uncertainties regarding water quality in the back-flooded pit/lake.</p>	<p>Agnico Eagle agrees with INACs recommendation to conduct detailed hydrogeological characterization studies to evaluate the hydraulic gradients and further assess the potential for arsenic diffusion of the pit walls. Data will be collected during construction and operation to verify inputs to water quality modelling. The results will inform hydrogeological modelling and will be conducted to inform future closure and post-closure water quality predictions. Should results of the hydrogeological modelling suggest that arsenic diffusion may result in elevated concentrations in the flooded pit in post-closure, then hydrodynamic modelling of the flooded pit lake will be performed to assess the occurrence and stability of meromixis. Of note is that the current open pit lake model considers fully mixed conditions within the open pit and within the above North Whale Tail Lake. Fully mixed conditions assume that constituent concentrations are equally distributed in the water body and thus, represent worst case concentrations at the open pit and North Whale Tail Lake surfaces than would occur if stable meromixis was to develop.</p> <p>Agnico Eagle believes that the information that has been provided to INAC and NIRB is sufficient to assess the impacts of the Whale Tail Pit Project on the environment and to make a determination on the Project. Agnico Eagle proposes that specifics to modelling and monitoring the hydrogeology be included in updated Management Plans to be submitted 60 days prior to construction.</p>
							<p>[INAC-FC#3a]. b. Evaluate Meromixis: If the additional hydrogeological characterization studies indicate that future metals levels are of potential concern, then the importance of establishing a stable stratified pit would be amplified. In that case, the Applicant should undertake a detailed quantitative analysis confirming that stable meromictic conditions will occur within the flooded pit. The analysis should include modelling that demonstrates meromixis will remain stable under a range of conditions (groundwater discharge, high wind, pit wall failure, etc.).</p>	
							<p>[INAC-FC#3c]. Monitoring Plan: To supplement the monitoring plans already submitted by the Applicant, INAC recommends that a revised and updated monitoring plan for the flooded pit of the Whale Tail Project be submitted to the NWB for review and approval prior to construction. The updated plan would include specified criteria that must be met before the flooded pit is considered to be effectively closed and any breaching of dams/dikes to be considered. In addition to specifying acceptable water quality, the criteria would include a required number of acceptable sampling events that would be necessary to confirm that stable conditions had been attained (this may include increased sampling events during certain times of year, etc).</p>	

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7) Groundwater Monitoring Plan	Term and Condition #15 (PC No. 008) Subject to the additional direction and requirements of the Nunavut Water Board, the Proponent shall prepare and implement a Groundwater Monitoring Plan that, at a minimum includes: • The collection of additional site-specific hydraulic data (e.g., from new monitoring wells) in key areas during the pre-development, construction and operation phases; • Definition of vertical and horizontal groundwater flows in the project development areas; • Delineates monitoring plans for both vertical and horizontal ground water; and • Thresholds that will trigger the implementation of adaptive management strategies that reflect site-specific conditions encountered at the project site.	Part I, Item 8: The Licensee shall establish the locations for the proposed compliance and internal monitoring locations as they relate to existing drainage courses beneath the Whale Tail Waste Rock Storage Facility's and other Dikes to ensure potential Seepage locations are adequately identified in accordance with the Groundwater Monitoring Plan, Version WT, dated June 2016, as approved by the Board.	The NIRB Project Certificate Term and Condition #15 requires: • "The collection of additional site-specific hydraulic data (e.g., from new monitoring wells) in key areas during the pre-development, construction and operation phases; • Definition of vertical and horizontal groundwater flows in the project development areas; • Delineates monitoring plans for both vertical and horizontal ground water" The expectation of CIRNAC and parties as agreed to by AEM was that additional sitespecific hydraulic data to define the vertical and horizontal groundwater flows would be collected in the critical pre-development period during the summer 2018 field season. CIRNAC was informed on October 17, 2018 that AEM had not installed the new groundwater monitoring wells as required in the NIRB Project Certificate. Further, AEM indicated that the only pre-development water monitoring information would be from the Westbay multiport well. AEM indicated that the data collection was delayed and additional data is still to be collected in November 2018. Additionally, the Groundwater Monitoring Plan does not contain any reference to future sampling from any groundwater wells currently installed at the site. CIRNAC is seeking explanation from AEM to justify their rationale for the alternative approach and for not complying with NIRB Project Certificate Term and Condition #15.	Agnico Eagle is of the view that it is in compliance with NIRB Project Certificate Term and Condition #15: "Subject to the additional direction and requirements of the Nunavut Water Board, the Proponent shall prepare and implement a Groundwater Monitoring Plan that, at a minimum includes: • The collection of additional site-specific hydraulic data (e.g., from new monitoring wells) in key areas during the pre-development, construction and operation phases; • Definition of vertical and horizontal groundwater flows in the project development areas; • Delineates monitoring plans for both vertical and horizontal ground water; and • Thresholds that will trigger the implementation of adaptive management strategies that reflect site-specific conditions encountered at the project site. With respect to the first bullet, while installation of new wells is given as an example as to how Agnico Eagle may undertake "collection of additional site-specific hydraulic data", it is not presented as the only option to fulfill this requirement. What follows provides a detailed summary of Agnico Eagle's efforts to collect additional site-specific hydraulic data since the Project Certificate was issued and how it plans to continue to do so during the project phases. Agnico Eagle completed the Whale Tail Post-Closure Pit Lake Thermal Assessment and updated the hydrogeological assessment and modelling. The results of these studies were presented to CIRNAC in July 2018 and confirmed the insignificant horizontal groundwater flows observed at the Whale Tail Site. As per the October 2018 meeting, Agnico Eagle committed to the collection of additional hydraulic data from the Westbay multiport well but not to the installation of additional wells. Vertical flow gradients are effectively evaluated with the Westbay well system installed at the Site, which allows the measurement of hydraulic head below Whale Tail Lake at multiple depth intervals in the unfrozen bedrock. Sampling of the groundwater and measurement of the vertical gradient was completed in November 2018 and will be included in the annual report. Horizontal flow gradients within the talk underlyne Whale Tail Lake are negligible, and As NIRB Project Certificate No.008 Term and Condition #15 is linked to the Groundwater Monitoring Plan, Agnico Eagle is referring CIRNAC to the Groundwater Monitoring Plan for arsenic thresholds.	• Included details on Westbay sampling frequency and the thermal analysis. • Included results 2018 Hydraulic Conductivity field testing at depth and 2018 Westbay sampling results	Section 1.1 Section 2.2.4.1 Section 2.2.4.3 Appendix B Section 2.2.4.2
			4) Mitigation Measures and Adaptive Management In the October 17 and 18, 2018 meeting with AEM, it was agreed that AEM would provide options available for mitigation if arsenic concerns materialized. AEM would incorporate these mitigation measures in the plans. The current version of the plans lacks this information. Further, the NIRB Project Certificate Term and Condition #15 further requires that the plans include: "thresholds that will trigger the implementation of adaptive management strategies that reflect site-specific conditions encountered at the project site." CIRNAC supports the NIRB requirement for thresholds which are requirements of the adaptive management process to mitigate uncertainties and address emerging conditions. CIRNAC maintains that the establishment of thresholds and the identification of the mitigation		• Provided details on adaptive management actions related to groundwater triggers.	Section 5; Table 12
	Term and Condition #16 (PC No. 008) Within two years of commencing operations, the Proponent shall: a) Conduct additional analyses to determine the approximate fill time for the Whale Tail Pit at closure; b) Undertake a hydrogeological characterization study to assess the potential for arsenic and phosphorous diffusion from submerged Whale Tail pit walls; c) If the results of the characterization study indicate a moderate to high potential for arsenic and/or phosphorous diffusion, perform detailed hydrodynamic modelling of the flooded pit lake prior to closure to evaluate meromictic conditions and flooded pit water quality; and d) Add these required activities to the site Groundwater Monitoring Plan.		3) Hydrogeological Characterization AEM used regional sub-permafrost groundwater flow system calculations, based on regional lake water levels, to determine the site specific Whale Tail Pit project hydrogeological characterization. Based on the site specific concerns for long-term arsenic leaching at the Whale Tail Pit project, CIRNAC views the regional approach alone without Whale Tail site specific field data to substantiate the hydrogeological modeling and validate the underlying hydrogeological assumptions to be lacking. In the absence of the site specific data, CIRNAC would request AEM provide data to validate the talk below Whale Tail Lake is open to the sub-permafrost groundwater flow system.	The width and shape of lakes in the Hydrogeology Baseline Study Assessment were reviewed as part of the Approved Project to estimate if open talks could be present below the lakes. Based on analytical solutions presented in Burn (2002), Golder estimated that open talks could be present for circular lakes with a radius of greater than about 300 m and for elongated lakes with a half-width of greater than about 150 m, which includes Whale Tail Lake. For the Whale Tail Lake area, thermal data is presently available from 10 thermistors (Knight Piésold 2015; Golder 2017, 2018). Data from thermistor AMQ17-1265A indicates that the talk near the central portion of the North Basin of Whale Tail lake extends about 112 m below the lake water level of 152.5 masl. Figure 1 and 2 are presenting readings of the thermistor AMQ17-1265A and the location of the thermistors installed at the Whale Tail site. Toward the South Basin, the closed talk below the North Basin is predicted by thermal modelling to transition to an open talk with direct connection to the sub-permafrost groundwater flow system. Although direct thermistor measurements are not available for the inferred open talk area in the South Basin of Whale Tail Lake, analytical models for circular and elongated lakes and 2-D numerical thermal analysis predict an open talk would be present. The assumption of an open talk below the South Basin is conservative with respect to the prediction of potential groundwater inflow to the dewatered open pit, as it allows for higher inflows and the potential inflow of deeper saline groundwater into the open pit. If an open talk is not present, groundwater inflows could be less than predicted and of lower TDS. Long-term post-closure predictions of groundwater flow to the Whale Tail North Basin area		
					• Included 2D and 3D Thermal Analyses results. • Defined monitoring plan (existing and future) for the vertical and horizontal groundwater flow.	Section 2.2.2 Appendix A

APPROVED PROJECT MANAGEMENT PLANS	CIRNAC [INAC] Comments from Approved Project November 2016 Completeness Review	Agnico Eagle Response to Information Requests (January 2017)	CIRNAC [INAC] Comments from Approved Project December 2016 Information Request	Agnico Eagle Response to Information Requests (January 2017)	CIRNAC [INAC] Comments from Approved Project March 2017 Technical Comments	Agnico Eagle Response to Technical Comments (April 2017)	CIRNAC [INAC] Comments from Approved Project August 2017 Final Written Statements	Agnico Eagle Response to Final Written Statements (August 2017)
8) Thermal Monitoring Plan	not applicable - no request made for this Plan	not applicable	Search of "thermal monitoring plan;" in INACs December 22, 2016 IR document: - no matches	not applicable	[INAC-TRC-1; 1]) A defensible cover design that considers the availability of cover material should be submitted for review. This design should include thermal modelling to confirm thaw depths and include the effects of climate change. INAC's guidance document entitled 'MEND Report 1.61.5c (2012) Cold Regions Cover System Design Technical Guidance Document, MEND, Funded by AANDC and Prepared for MEND, Edited by O'Kane Consultant Inc.' should be used in the design and analysis of the cover system (s).	[INAC-TRC-1; 1]) Agnico Eagle will perform thermal modelling which will incorporate climate change and acquired information from the Meadowbank Waste Rock Storage Facility (WRSF) monitoring program, and will use the results of the model to support final design of the WRSF. Modelling results, revised design, if any, and proposed locations of thermistors for long-term monitoring will be submitted to interested parties prior to the Final Hearing. MEND Report 1.61.5c (2012) will be used as guidance and qualified experts will review the design and analysis of the cover system.	[INAC-FC-2, a.] Revised Thermal Modelling: The thermal modelling should be calibrated and re-run using ground temperature monitoring data from the Meadowbank site. The findings of the revised thermal modelling should be submitted for review and should inform the detailed WRSF cover designs as part of the final closure plan.	[INAC-FC-2, a.] It is understood that INAC is referring to the use of thermal monitoring data from the Meadowbank WRSF (rather than Meadowbank native ground temperature) to calibrate the model. Meadowbank operation installed 14 thermistor strings between 2013 and 2015 at different locations at Portage RSF (Figure 1). Among these strings, 4 were installed in November 2013 (RSF-3 to RSF-6) and 10 in October 2015 (RSF-7 to RSF-16). Considering that on an annual basis the active layer reaches its maximum depth in October, the strings installed in 2013 provide 3 years of readings on the active layer behavior and the temperature of the waste rock pile while the strings installed in 2015 provide only 1 year of data which may not represent stable temperature conditions within the pile. The 2015 thermistor strings is where an active layer depth greater than 4 m is documented. However, the data collected from these strings are not considered to reliably represent the equilibrium temperature conditions for the entire pile for the purpose of modelling and calibration given that their installation is too recent and the temperature profile provided may not yet be stabilized. Among the 4 thermistors installed in 2013, 2 of them (RSF-4 and RSF-5) are located in the middle of the Portage RSF and can be used for calibration of a 1D model. As these 2 strings show a maximum active layer depth of 4 m, Agnico Eagle considers that all the conclusions and recommendations presented as part of the commitment 39 are still appropriate.

APPROVED PROJECT MANAGEMENT PLANS	NIRB Term and Condition Management Plan (March 2018)	NWB Decision on Management Plan (October 2018)	CIRNAC Comments from Approved Project November 2018 - Fulfillment of Terms and Conditions	Agnico Response (November 2018)	Revisions Presented in Response to Expansion Project NIRB Technical Comments (May 2019)	Location in Expansion Project WL Management Plan (May 2019 Plans)
8) Thermal Monitoring Plan	Term and Condition #10 (PC No. 008) In consultation with applicable regulatory agencies such as Indigenous and Northern Affairs Canada and Natural Resources Canada, the Proponent shall undertake additional site-specific permafrost monitoring, mapping and thermal analysis to: ❑ Document permafrost conditions, including seasonal thaw and amount of ground ice; ❑ Inform the detailed design of project infrastructure such as the Whale Tail pit, water management structures, mine site and haul roads, waste rock storage facility, tailings storage facility; and ❑ Ensure the integrity of such infrastructure is maintained after construction.					
	Term and Condition #14 (PC No. 008) The Proponent shall develop and implement a Thermal Monitoring Plan to identify potential changes in talkk distribution and flow paths that may result from the development of project infrastructure, including the Whale Tail pit, dikes, and water impoundments.	Part I, Item 11: The Licensee shall undertake the Thermal Monitoring Program detailed in the Whale Tail Waste Rock Management Plan as approved by the Board.				