



Environmental Protection Operations Directorate
Prairie & Northern Region
5019 52nd Street, 4th Floor
P.O. Box 2310
Yellowknife, NT X1A 2P7

ECCC File: 6100 000 008/015
NWB File: 2AM-WTP1826

March 1, 2019

via email at: licensing@nwb-oen.ca

Richard Dwyer
Manager of Licensing
Nunavut Water Board
P.O. Box 119
Gjoa Haven, NU X0B 1J0

Dear Richard Dwyer:

**RE: 2AM-WTP1826 – Agnico Eagle Mines Limited – Whale Tail Pit Project –
Groundwater Monitoring Plan Version 2.1**

Environment and Climate Change Canada (ECCC) has reviewed the information submitted to the Nunavut Water Board (NWB) regarding the above-mentioned monitoring plan and is submitting comments via email. ECCC's specialist advice is provided based on our mandate, in the context of the *Canadian Environmental Protection Act* and the pollution prevention provisions of the *Fisheries Act*.

The following comments are provided:

1. Groundwater Monitoring Plan Updates

Reference(s)

- Agnico Eagle Mines Limited. Whale Tail Pit Groundwater Monitoring Plan Responses to ECCC and CIRNAC reply. January 15, 2019.
- Agnico Eagle Mines Limited. Whale Tail Pit Project - Groundwater Monitoring Plan Version 2 Revision 1. February 2019.

Comment

In the January 15, 2019 Groundwater Monitoring Plan response document, the Proponent states that, "Agnico Eagle agreed to review the plan annually and update the plan if required. This statement will be added to the Groundwater Monitoring plan in the next revision of this plan" (Page 2). However, the revised Groundwater Monitoring Plan does not appear to contain this statement.

ECCC's Recommendation(s)

ECCC recommends that the Proponent update the Groundwater Monitoring Plan to include the statement that the plan will be reviewed annually and updated as required.

2. Seepage Surveys

Reference(s)

- Agnico Eagle Mines Limited. Whale Tail Pit Groundwater Monitoring Plan Responses to ECCC and CIRNAC reply. January 15, 2019.
- Agnico Eagle Mines Limited. Whale Tail Pit Project - Groundwater Monitoring Plan Version 2 Revision 1. February 2019.

Comment

In the January 15, 2019 Groundwater Monitoring Plan response document, the Proponent states that, "Agnico Eagle will be collecting samples from Pit Seepage *ST-S-1 (Seeps – TBD)* on a monthly basis or as found as per NWB Water Licence 2AM-WTP1826 Schedule I Table 2 Monitoring Program. SNC-Lavalin will review the results of the seep water sample collected monthly and will complete a seepage assessment twice a year for the first two years and once a year starting in the third year. This assessment will take place until the end of operation and results will be presented in the annual report" (Page 3).

The revised Groundwater Monitoring Plan does not appear to incorporate the above-stated seepage monitoring frequency. Specifically, Section 3.2.1 (Water Quantity) has not been updated.

ECCC's Recommendation(s)

ECCC recommends that the Proponent update the following seepage monitoring commitments in Section 3.2.1 (Water Quantity) of the Groundwater Monitoring Plan and in any other relevant sections:

- Collect samples from Pit Seepage *ST-S-1 (Seeps – TBD)* on a monthly basis or as found.
- Complete a seepage assessment twice a year for the first two years and once a year starting in the third year, and continuing until the end of operations.

Should you require further information, please do not hesitate to contact me at (867) 669-4732 or Emily.Nichol@canada.ca.

Sincerely,

[original signed by]

Emily Nichol
A/Senior Environmental Assessment Coordinator

cc: Bradley Summerfield, A/Head, Environmental Assessment North (NT and NU)