



Water Resources Division
Resource Management Directorate
Nunavut Regional Office
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Your file - Votre référence
2AM-WTP1830
Our file - Notre référence
GCdocs#141959552

November 28, 2025

Richard Dwyer
Manager of Licensing
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**Re: Crown-Indigenous Relations and Northern Affairs Canada's Review of Agnico
Eagle's Whale Tail GSP-2 Storage Pond Design Report**

Dear Richard,

Thank you for the opportunity to review Agnico Eagle's Whale Tail Groundwater Storage Pond-2 (GSP-2) Design Report, for Type A Water Licence No. 2AM-WTP1830.

Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC) examined the report and supporting documents 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* and provides the following Technical Review Memorandum for the Board's consideration.

Please contact me or Andrew Keim by email at john.macinnis@rcaanc-cirnac.gc.ca or andrew.keim@rcaanc-cirnac.gc.ca if there are any questions or concerns.

Sincerely,

John MacInnis
Senior Environmental Assessment Specialist



Technical Review Memorandum

Date: November 28, 2025

To: Richard Dwyer, Manager of Licensing, Nunavut Water Board

From: John MacInnis, Senior Environmental Assessment Specialist, Crown-Indigenous Relations and Northern Affairs Canada

Subject: Crown-Indigenous Relations and Northern Affairs Canada's Review of Agnico Eagle's Whale Tail GSP-2 Storage Pond Design Report

Region: ☐ Kitikmeot ☒ Kivalliq ☐ Qikiqtani

A. BACKGROUND

On November 5, 2025, the Nunavut Water Board invited interested parties to comment on Agnico Eagle's (The Licensee) Whale Tail GSP-2 Storage Pond Design Report, for Type A Water Licence No. 2AM-WTP1830.

The Licensee intends to begin construction of GSP-2 to support the management of saline water as underground mining advances at the Whale Tail Mine. GSP-2 serves as a transfer pond when the maximum water storage capacity is reached within GSP-1. Water from the underground mine will continue to be discharged into GSP-1, and will be transferred into GSP-2 on an "as needed" basis. Once mining is completed in the IVR-1 pit in Q4 of 2028, water accumulating in the saline water storage ponds will be pumped back into the IVR pit for temporary storage until underground mining ceases. Saline water will be finally transferred into the underground openings during the closure period.

GSP-2 is an approved facility under Type A Water Licence No. 2AM-WTP1830, and was originally designed to store 70,000 cubic meters (m³) of water. In 2021, the proposed location of GSP-2 was northeast of GSP-1, adjacent to the IVR Waste Rock Storage Facility. Due to life of mine extensions, new long-term underground groundwater inflow predictions, and footprint restrictions, GSP-2 is now proposed to be constructed north of the approved IVR pit shell and south of Nemo Lake Road, to accommodate field conditions and an updated storage volume of 235,000 m³. This location was identified as the most effective option for water storage, according to the available site footprint and in-situ ground conditions.

CIRNAC provides the following comments and recommendations. A summary of subjects and recommendations is shown in Table 1.



Table 1: Summary of Recommendations.

Recommendation Number	Subject
R-01	Conditions Applying to Construction and Operation
R-02	Water Management
R-03	Catchment Hydrology
R-04	Design Details

B. DOCUMENTS REVIEWED AND REFERENCED

Table 2 lists the documents reviewed under the submission.

Table 2: Documents reviewed and referenced.

Document Title	Author, File No., Rev., Date
Whale Tail GSP-2 Storage Pond Design Report	Agnico Eagle Meadowbank Complex, November 2025
Amended Water Licence No: 2AM-WTP1830	Nunavut Water Board, 2018
Whale Tail Thermal Monitoring Plan Version 5	Agnico Eagle Mines Limited, February 2025
Whale Tail Water Management Plan Version 14	Agnico Eagle Meadowbank Division, March 2025
Meadowbank and Whale Tail 2024 Annual Geotechnical Inspection	Agnico Eagle Mines Limited, February 2025
Meadowbank Complex 2024 Annual Report	Agnico Eagle Mines Limited, March 2025
CIRNAC Review of the 2024 Annual Report for the Meadowbank and Whale Tail Gold Mine Projects	CIRNAC, July 2025

C. RESULTS OF REVIEW

1. Conditions Applying to Construction and Operation

Comment:

CIRNAC notes that the Licensee has not complied with the reporting requirements outlined in Part D, Item 3 of 2AM-WTP1830.

a) Site Selection

The Licensee states that the new location for GSP-2 was identified internally as the most effective solution for water storage, according to the available site footprint and in-situ ground conditions. However, Part D, Item 3(b) describes that the Design Report shall include site-specific data and analysis to support the design and management decisions.



The rationale for site selection is not sufficiently justified and requires the provision of site-specific, evidence-based data that was used for decision-making.

b) Geochemical Analysis of Material

The Licensee described that if potentially acid-generating material is encountered, the material will be managed according to the Whale Tail Waste Rock Management Plan. However, Part D, Item 3(c) describes that the Design Report shall include the geochemical analysis of waste rock and fill, demonstrating the acid rock drainage and metal leaching characteristics. Supporting geochemical data was not provided with the Design Report.

c) Construction Methods

The Licensee stated that sediment and erosion control measures will be put in place if needed. However, Part D, Item 3(e) describes that the Design Report shall include technical specifications for sedimentation, erosion control and bank stabilization measures. Technical specifications for sedimentation and erosion controls were not included in the Design Report.

Recommendation:

(R-01) CIRNAC recommends that the Licensee update the Design Report to comply with the reporting requirements outlined in Part D, Item 3 of 2AM-WTP1830.

2. Water Management

Comment:

The Design Report states that no water management measures are expected to be necessary during construction, which is expected to take five (5) months to complete, beginning in January. CIRNAC notes that the current schedule for construction could overlap with the freshet period, which could increase hydrological flows at the site. Without adequate planning and water management practices, increased hydrological flows could reduce water quality in downstream receiving environments.

CIRNAC also notes that the proposed construction activities, such as blasting and excavation, have the potential to mobilize sediment and atmospheric particulate matter during the winter months, which could increase loads in snowpacks and subsequent meltwaters during the spring. The Design Report does not describe mitigation measures that would be used to minimize impacts on water quality during construction.

Recommendation:

(R-02) CIRNAC recommends that the Licensee update the Design Report to include water management practices that would be used if construction overlaps with freshet and applicable management practices that would be used to mitigate potential impacts of construction on water quality.



3. Catchment Hydrology

Comment:

The Design Report states that GSP-2 will be constructed north of the IVR pit shell and south of Nemo Lake Road, and its design allows for the storage of 235,000 m³ of water, including 35,000 m³ of contingency for catchment runoff. However, the Design Report also states that water will be transferred into GSP-2 on an “as needed” basis. This information appears to suggest some uncertainty on the quantity of runoff that could conceivably be collected in GSP-2. For example, if there is less than 200,000 m³ of water transferred from GSP-1 or underground mining, GSP-2 would have an increased capacity for additional catchment runoff. It is also unclear to CIRNAC how the contingency runoff volume was determined, as there are no references to any management plans and analysis in the Design Report.

The hydrological implications of constructing GSP-2 in the new proposed location were not discussed, such as potential changes to pit inflows and water quality, warranting further investigation.

Recommendation:

(R-03) CIRNAC recommends that the Licensee:

- Clarify how the catchment runoff volume was derived, including outlining any assumptions, limitations, and results associated with the analysis; and
- Assess the hydrological implications of constructing GSP-2 in the new proposed location, including any changes to pit inflows and water quality during operations.

4. Design Details

Comment:

Section 2.2 of the Whale Tail GSP-2 Design Report describes that construction would involve five (5) benches, assuming a single-lane switchback access road connecting to the existing IVR Ring Road. However, the construction design drawings presented in Appendix A state that six (6) benches are proposed. The provision of accurate design details is necessary to support a fulsome understanding of project construction and compliance with Part D, Item 1, of 2AM-WTP1830.

CIRNAC also notes that the Licensee did not clearly assess its assumptions about the proposed design, in the context of the proposed site. The design assumes an overburden thickness of 7 m, with 1 m of contingency, but it is unclear if any site-specific information was used to inform these design parameters. The Design Report describes that the thickness of overburden in the original location could have led to unstable slopes, and the low-lying topography did not allow for effective water management practices. Providing site-specific information is justified to inform sound construction and water management practices.

Recommendation:



(R-04) CIRNAC recommends that the Licensee confirm the number of benches that are contemplated for construction and provide site-specific information that was used to justify the design assumptions.