



Water Resources Division  
Nunavut Regional Office  
Iqaluit, NU X0A 0H0

Your file - Votre référence  
2AM-WTP1826

May 7, 2019

Our file - Notre référence  
CIDM# 1249896

Ida Porter  
Licence Administrator  
Nunavut Water Board  
Gjoa Haven, NU X0B 1J0

Sent via email: [licensing@nwb-oen.ca](mailto:licensing@nwb-oen.ca)

**Re: Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC) representations to Agnico Eagle Mines Limited's (AEM's) Landfill Construction Notice – Whale Tail Pit Project under AEM's Type "A" Water Licence No. 2AM-WTP1826.**

Dear Ms. Porter,

Thank you for the email notice to interested parties, received on April 23, 2019, regarding AEM's Landfill 60-Day Construction Notice at the Whale Tail Pit Project. The landfill construction notice was submitted as a requirement of Part D, Item 1 & 2, of Type "A" Water Licence No. 2AM-WTP1826. CIRNAC reviewed and provided comments pursuant to its mandated responsibilities from the *Nunavut Waters and Nunavut Surface Rights Tribunal Act* and the *Department of Indian Affairs and Northern Development Act*.

### Comment 1

CIRNAC is not able to locate information indicating the type of existing soil layers under the berms planned for construction along the perimeter of the landfill. Depending on the type of existing soil layers, a site-specific stability analysis may be required. This type of analysis may have already been completed for the Whale Tail Waste Rock Storage Facility (WRSF). CIRNAC requests AEM clarify or submit accordingly the results of the indicated stability analysis of the berms.

### Comment 2

Section 3.3 – Leachate Management states: *"the quantity of leachate is expected to be minimal, and of low ionic strength. The proposed landfill will nonetheless receive precipitation during the summer period, which could infiltrate the landfill before it can evaporate. In the event that leachate reports from the landfill, it will be collected in the WRSF Pond and pumped to the Whale Tail Attenuation Pond for further management (see Whale Tail Pit Water management plan in Appendix C). Based on the design strategy for the proposed landfill, and the management and operating procedures listed*

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*above, a liner is not considered necessary for the landfill.* It is not clear to CIRNAC how AEM is anticipating to monitor for and mitigate any unexpected leachate percolating through the existing natural soils underneath the landfill. CIRNAC requests AEM clarify how AEM is anticipating to monitor for and mitigate any unexpected leachate percolating through the existing natural soils underneath the landfill.

### Comment 3

Section 3.2 – Material Placement Protocol states: *“once compacted, waste rock will be placed on the debris to infill voids. Once a continuous layer of waste rock has been covered the compacted debris a final cover of non-potentially acid generating (NPAG) waste rock will be placed over the entire landfill area.”* It is not specified whether the waste rock used on the debris to infill voids is also NPAG. CIRNAC requests clarification on if NPAG waste rock will be used within the landfill to infill the debris voids.

### Comment 4

On Drawing – Whale Tail Landfill and Cross Sections [190419 2AM-WTP1826 Whale Tail Landfill Design Report-ILAE (page 8 of 9 pdf)], CIRNAC noticed that one (1) x 600 mm layer of NPAG waste rock will be used to cover the landfill. In the Landfill and Waste Management Plan [170125 2AM-WTP---- Landfill Design & MGMT Plan-IMLE (page 27 of 170 pdf ) two (2) other layers (transition rockfill and liner bedding till layers) have been indicated in addition to the (1) x 600 mm layer of NPAG waste rock cover for a total of three layers. CIRNAC requests AEM to clarify the number and type of layers in the landfill cover design, and if applicable, the reason for the change in landfill cover design from three layers to one layer.

### Comment 5

Section 3.1 – Construction Method states: *“a service road, accessible only to mine staff and Agnico Eagle contractors, will connect the landfill to other mine infrastructure.”* No additional details on the service road are provided in the landfill design report nor accompanying appendices. CIRNAC requests the specifications of the indicated service road for staff and contractors vehicles to access the landfill are provided with the landfill design report.

If you have any questions or require further information with respect to this matter, contact me at (867) 975-3877 or email [michelle.blade@canada.ca](mailto:michelle.blade@canada.ca), or Godwin Okonkwo at (867) 975-4550 or email [godwin.okonkwo@canada.ca](mailto:godwin.okonkwo@canada.ca).

Regards,

Michelle Blade  
Regional Coordinator, Water Resources, Nunavut Regional Office