



February 9th, 2021

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

Re: Agnico Eagle Mines – Whale Tail Project Responses to IVR D-1 Dike Design Report Comments

Dear Mr. Dwyer,

As requested, the following responses are intended to address the comments made in the below letter:

- February 5, 2021; IVR D-1 Dike Design Report CIRNAC Comments– Water License 2AM-WTP1830.
- February 5, 2021; IVR D-1 Dike Design Report KIA Comments– Water License 2AM-WTP1830.

Should you have any questions or require further information, please do not hesitate to contact us.

Best regards,

Casandra DeForge
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819-759-3555
Compliance Counselor



1 CIRNAC Comments

1.1 Pond Capacity

Comment 1: The pond storage curve in Figure 4-2 of the Design Report indicates the IVR pond capacity is 400 000m³ at the maximum operating level of 163.2 m. This does not match the storage capacity for the IVR Attenuation Pond used in the Water Balance Update, characterized as 534 819 m³ in Table 29. An undersized storage pond would lead to difficulties in managing site water.

Recommendation 1: CIRNAC recommends the licensee clarify why they are proposing to construct a dike to create a pond with 25% less capacity than was previously planned, given that the larger capacity was used when calculating the site water balance.

Agnico Eagle's Response:

The IVR Attenuation Pond capacity was designed according to the site wide water balance data presented in the latest approved version of the Whale Tail Project Water Management Plan (V5). There is an error in Table 29 of this plan. While this table indicates that the maximum water capacity required is 534,819 m³ at El. 163.9, Figure 88 indicates that the water level in IVR Attenuation pond is not expected to go over El. 163.2. This information can also be confirmed in the site wide water balance data presented on page 345 of 540 in the Water Management Plan. The data of the water balance show that the maximum pond volume expected in operation is 410 899 m³ at El. 163.17 which is coherent with the maximum operating level of the structure.

This error in Table 29 will be fixed in the next revision of the Whale Tail Project Water Management Plan.

1.2 Seasonal Operating Water Levels

Comment 2: Operating water levels are discussed in section 4.3 of the Design Report, which states: "An initial water elevation in the pond equal to the maximum operating level (MOL) of 163.2 m, based on the average water balance of the site (Golder, 2019). This maximum water level is the level acceptable during winter conditions only. During summer, the normal operating water level will be set below the El. 163.2 m."

If pond water levels are kept at maximum operating levels during the winter, it is not clear how melt water from freshet will be managed. Proper water management on site is critical and requires the definition of operating water levels that will allow for site contact water to be collected and discharged, with treatment if necessary, without emergency releases or overtopping the dike.

Operating water levels for the IVR D-1 Dike are not defined in the Water Management Plan, which is understandable given the design hadn't been completed prior the Plan's writing.



Recommendation 2: CIRNAC recommends the licensee define operating water levels for both the summer and fall/winter and clarify how they propose to manage freshet meltwater if the pond is at maximum operating level over winter. Additionally, CIRNAC recommends the licensee integrate the defined operating water levels in the next update to the Water Management Plan.

Agnico Eagle's Response:

The maximum operating level for normal conditions is set at El. 163.2 at all time. The normal operating level will be set at a lower elevation based on operational strategy. Details on the operating level will be included in the next update of the Water Management Plan.

While doing the hydrological sizing of the IVR D-1 dike the scenario that was used to set the spillway elevation at El. 164.8 m was the maximum operating level (MOL) at the beginning of freshet plus the 1:100 spring flood peak event. This will ensure that water will be managed at freshet without release to the Whale Tail Attenuation Pond. The IVR Attenuation Pond can also sustain the MOL plus the inflow design flood (IDF) without overtopping the IVR D-1 crest that is set at El. 165.5. This calculation is conservative as it does not take into account any potential water transfers out of the IVR Attenuation pond prior to freshet or any winter discharge.

2 KivIA Comments

Comment 1: The KivIA is encouraged to see a spillway as part of the dame design. This will assist with minimizing the impact of higher water levels on the integrity of IVR D-1.

Agnico Eagle's Response:

Agnico Eagle acknowledges the KivIA's comment.

Comment 2: The KivIA looks forward to reviewing the monitoring information in the proponent's annual reports.

Agnico Eagle's Response:

Agnico Eagle acknowledges the KivIA's comment and will provide monitoring information in the annual reports.