



Water Resources Division
Resource Management Directorate
Nunavut Regional Office
P.O. Box 100
Iqaluit, NU, X0A 0H0

Your file - Votre référence
2AM-WTP1830
Our file - Notre référence
CIDM#

November 19, 2020

Mr. Richard Dwyer
Manager of Licensing
Nunavut Water Board
P.O. Box 119
Gjoa Haven, NU, X0B 1J0
E-mail: licensing@nwb-oen.ca

Re: Crown-Indigenous Relations and Northern Affairs Canada Review Comments for the Whale Tail South Channel Construction Summary report for Water Licence 2AM-WTP1830 by Agnico Eagle Limited

Dear Mr. Dwyer,

Thank you for your October 19, 2020 email invitation to provide comments for the Whale Tail South Channel Construction Summary report for the Water Licence 2AM-WTP1830 for Whale Tail Pit Expansion Project by Agnico Eagle Limited.

Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC) has conducted this review 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*. Please find attached review comments and recommendations for consideration by the Nunavut Water Board for consideration.

1. DEVIATION FROM INITIAL DESIGN

Comment 1

Section 3.3.5 of the report lists the size of the rock fill used for the French drain as being boulders with a size of 0.5m to 1.0m which appears to be in compliance with the initial design. On the other hand, the site inspection report (dated 04/20/2020) identifies that boulders having a size range between 0.5m and 2.0m have been installed. Considering this deviation from initial design, CIRNAC recommends an inclusion of discussions on the impacts and risks of having a larger stone size in the French drains.

Recommendation 1

CIRNAC recommends that AEM include discussions on the impact and risks of using larger stones sized and possible mitigation plans for the identified risks.



2. FRENCH DRAIN VOIDS

Comment 2

As noted in the Section 4.0 of the report, the sides of the French drain have not been enclosed with geotextile. In CIRNAC opinion, over time this can cause some of the fines in the soil surrounding the French drains to migrate into the drain's voids which will reduce the overall seepage efficiency.

Recommendation 2

CIRNAC recommends that AEM provide further discussions on the procedures that were used onsite to separate the French drains from the surrounding soil and the impacts of not using geotextile.

3. QUALITY ASSURANCE/QUALITY CONTROL

Comment 3

Section 3.1 Paragraph 7 states

“ The QA and QC representatives (SNC-Lavalin and GHD) worked on a 2-week rotation basis. Due to logistics for this remote site, no QC/QA day-shift representatives could be available on site for each rotation change during a 12hour day shift every two weeks”.

Recommendation 3

CIRNAC recommends that AEM confirm if QA/QC activities were carried out during the rotation days. If yes, how did AEM make up for the void to handle all QA/QC tasks that required approval by QC/QA representative.

4. GEOCHEMICAL ANALYSIS OF WASTE ROCK AND FILL

Comment 4

Water licence condition Part D item 3(c) with reference to requirements for construction and operation, requires licensee to perform

“ Geochemical analysis of waste rock and fill, demonstrating the Acid Rock Drainage and Metal Leaching characteristics of these activities. ”

The report indicates that geochemical testing and classification of fill materials was under the responsibility of AEM and not the consultant. It is not clear if this analysis was completed.

Recommendation 4

CIRNAC recommends that AEM clarify if a geochemical analysis of the waste rock and fill materials were carried out.



CIRNAC appreciates the opportunity to participate in this review. If there is any question regarding the above comments and recommendations, please contact me at (867) 975-4550 or godwin.okonkwo@canada.ca.

Sincerely,

Godwin Okonkwo
Manager Water Resources