



December 15th, 2020

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 South Whale Tail Channel Construction Summary Report Comments

Dear Mr. Dwyer,

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

- November 19, 2020; 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.

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

Best regards,

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Compliance Counselor



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.

Agnico Eagle's Response:

The design report for the Lake A45 section of the South Whale Tail Channel (667648-4000) indicate 'boulders' as the material type for the French drain. The objective the French needed to be made of coarse material (greater than 0.5 m) to provide a drainage pathway through the berm. Most of that zone was built with rockfill ranging from 0.5 to 1 m but there were some larger boulders placed locally. Having rock with a particle range from 0.5 m to 2 m is not considered a design deviation as this will meet the design intent.

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.

Agnico Eagle's Response:

The geotextile in the French drain has been installed all around the boulders in the drain (side, base and top) as per the design. The QA report of April 15 confirms this information. The Information to the contrary in Section 4.0 is not accurate.



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.

Agnico Eagle’s Response:

The rotation day of the QA and the QC were different so there never was a period when both the QA and QC was absent. The day of personnel rotation, the Owner’s Representative had an increased presence in the field to observe the construction activity and to ensure that no activity requiring approval by QA/QC representative were carried out during that period.

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.

Agnico Eagle’s Response:

Geochemical analysis of all material used for the construction of the channel was performed by Agnico using the same methodology used to classify waste rock on site to ensure that the material was non-acid generating and non-metal leaching.