February 10, 2026

Richard Dwyer
Manager of Licensing
Nunavut Water Board
P.O Box 119
Gjoa Haven
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Re: 2AM-WTP1830 Agnico Eagle Mines – Whale Tail Mine Responses to Operational ARD-ML Sampling and Testing Plan V.8.0 Comments

Dear Mr. Dwyer,

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

- January 16, 2026; Environment and Climate Change Canada - RE: 2AM-WTP1830 – Agnico Eagle Mines Ltd. – Meadowbank Complex – Operational ARD-ML Sampling and Testing Plan V.8.0 – Whale Tail Mine
- January 28, 2026: Crown-Indigenous Relations and Northern Affairs Canada's Review of the Whale Tail ARD-ML Sampling plan Update – Version 8 for Whale Tail Mine, Type A Water Licence No. 2AM-WTP1830

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

Regards

Alain Mouton

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1 ECCC Comment

1.1 Field sampling frequency in IVR Phase 2 Pit

Reference: Agnico Eagle Meadowbank Complex Operational ARD-ML Sampling and Testing Plan – Whale Tail Mine. December 2025, Version 8.0: Section 3.1 Field Sampling; Table 3.0 Recommended Sampling Frequency by Rock Type

Comment: In Section 3.1, the Proponent reports the following conclusions and recommendations based on information gathered during five years of mining the IVR Pit:

- "*IVR Phase 2 Pit has been returning carbon and sulfur assay values translating in CaNPR values (as defined in Section 3.2 of this document), above the threshold value of 2 for the past four benches and typically ranging between 5 and 30 for the north-west part (North Basalt) and ranging from 20 to 300 for the south part (Central Sediment and Komatiite South) of the study area.*
- Conversely, the arsenic content returned systematic values well above 75 ppm for the same *set of samples and even systematically in the high hundreds of ppm's (usually ranging between 100-1000 ppm).*
- *The IVR Extension demonstrates few occurrences of minable NPAG/NML packets. For IVR Phase 2 the NPAG/NML packets are insignificant in terms of volume to deem suitable for mining separately (see Figure 1.2).*

Based on the above observations, although non-acid generating per the CaNPR calculation, the material from IVR Phase 2 Pit must be systematically classified as PAG/ML due to its high content of arsenic and associated leachability potential. For this reason, the Geology Superintendent recommends to:

- *Decrease the sampling frequency of 1/4 ratio for Carbon/Sulfur and Arsenic in IVR Phase 2 to 1/16 ratio. This would be applied to all remaining mining benches in the IVR Phase 2 Pit.*
- *Maintain the 1/4 sampling ratio for the remainder of the IVR Pit, including the IVR Extension.*"

Given the above recommendations, and the proposal to "*…reduce further the sampling frequency in IVR PH 2 to every 16th hole."* (Table 3.0)*,* it is not clear whether the rock mined in IVR Phase 2, which was classified as potentially acid generating/metal leaching (PAG/ML) due to high arsenic content, will continue to be classified as PAG/ML regardless of the results of future sampling conducted at reduced frequency.

Recommendation: ECCC recommends the Proponent clarify whether the mineable rocks in the IVR Phase 2 will continue to be classified as PAG/ML regardless of the results of future sampling conducted at reduced frequency.

> ***Agnico Eagle's Response:*** *Considering the recommendation to reduce the sampling frequency in IVR PH 2 to every 16th hole, Agnico Eagle confirms that all mineable rocks in this pit will continue to be classified as PAG/ML regardless of the results of future sampling conducted at reduced frequency. Furthermore, if over time, mineable areas that have the possibility to contain*

NPAG/NML material are identified (either following field observations or by reviewing the blast hole data) a local sampling frequency of 1/4 ratio for Carbon/Sulfur and Arsenic will be reintroduced and a thorough review of the results will be conducted before NPAG/NML packets are outlined in the field.

2 CIRNAC Comment

2.1 Sampling frequency in Whale Tail Pit South

Comment: In 3.1, the proponent states:

- "The central and northern parts (north domain) of the Whale Tail Pit systematically return values either with an NPR below 1 or an Arsenic content above 75 ppm. The rock is classified as PAG/ML.
- The southern part (south domain) of the Whale Tail Pit is returning NPAG with a few standalone occurrences of PAG/ML material.
- Assay results show NPAG/PAG boundary is consistently controlled by the presence of a lithological contact separating these two domains.
- Based on the above observations, the Geology Superintendent recommends: Decreasing the 1/4 sampling ratio south of the lithological contact (the only area of the Pit with potential for NPAG/NML material) to a ratio of 1/8.

The concern is that it is unclear how the PAG/ML material will be located in full and separated with equal precision given a lower sampling frequency. In Appendix C, Figure 15 seems to show the PAG/ML areas of the south domain much less defined by sampling.

Recommendation: (R-01) CIRNAC recommends that the proponent provide their plan or process that will be followed during mining operations that will ensure the material in the south domain of Whale Tail Pit will remain defined and segregated with less sampling.

Agnico Eagle's Response: *Agnico Eagle will ensure that the material in the south domain of the Whale Tail Pit will continue to remain defined and segregated with less sampling by adhering to the following practices:*

- *Continuing to have a geologist design NPAG/NML packets using a conservative approach, with boundaries drawn closely around the blasthole assay results on which they are based. Thus, minimizing the risk of inadvertently including the surrounding PAG/ML material during mining.*
- *The field presence of the material is predictable from gained mining experience. NPAG/NML material is well-defined and consistently observed from bench to bench.*
- *NPAG/NML material is associated with mafic volcanic and greywacke rock units, which are in clear contrast with the adjacent komatiite and chert rock units, making visual differentiation straightforward during mining. The Grade Control Technicians can rely on this visual differentiation in the field during the mining operations to segregate the NPAG/NML material.*