



Water Resources Division
Resource Management Directorate
Nunavut Regional Office
918 Federal Rd
Iqaluit, NU, X0A 3H0

Your file - Votre référence
2AM-WTP1830
Our file - Notre référence
GCDocs#127349442

July 09, 2024

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's Review of 2024
Modification Application for Type A Water License No. 2AM-WTP1830.**

Dear Mr. Dwyer,

Thank you for your May 28, 2024, invitation to review the 2024 Modification Application submitted by Agnico Eagle Mines Limited, for Type A Water License No 2AM-WTP1830.

Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC) examined the modification application and associated management plans 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 CIRNAC comments and recommendations in the attached Technical Memorandum for the Nunavut Water Board's consideration.

If there are any questions or concerns, please contact me at Aminul.Haque@rcaanc-cirnac.gc.ca or (867) 975-4282 or Andrew Keim at (867) 975-4550 or Andrew.Keim@rcaanc-cirnac.gc.ca.

Sincerely,

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Aminul Haque
Regional Water Management Coordinator



Technical Review Memorandum

Date: July 09, 2024

To: Richard Dwyer, Manager of Licensing, Nunavut Water Board

From: Aminul Haque, Regional Water Management Coordinator, CIRNAC

Subject: Crown-Indigenous Relations and Northern Affairs Canada's Review of 2023 Modification Application for IVR and Whale Tail open pit mines, Type A Water License No. 2AM-WTP1830.

Region: ☐ Kitikmeot ☒ Kivalliq ☐ Qikiqtani

A. BACKGROUND

The Whale Tail (Amaruq) satellite deposit (Whale Tail Pit Project, the Project) is located northwest of the Meadowbank mine and 150 Kilometers north of the Hamlet of Bake Lake, Nunavut. The Project was first licensed by the Nunavut Water Board (NWB) in 2018, following a full environmental review completed by the Nunavut Impact Review Board on March 15, 2018. The Project involves: constructing, operating, maintaining, reclaiming, closing and monitoring of an open pit gold mine.

Following licensing, additional infrastructure to support the Whale Tail and IVR pits was built at the Amaruq site, including a truck shop/warehouse, fuel storage, and additional camp facilities. In 2018, Agnico Eagle Mines Ltd. (Agnico Eagle) proposed an expansion to increase gold production from the original Whale Tail Pit Project by expanding mining activities at the Whale Tail Pit, IVR open pit, and underground pit development.

The NWB Water License amendment process for the Whale Tail Pit Expansion Project was completed on May 12, 2020, and Water License Amendment No. 2AM-WTP1830 was issued. Commercial production under the Whale Tail Pit Expansion Project began in December 2020.

In 2021 and 2023, Agnico Eagle proposed modifications to the Whale Tail Pit Expansion Project, specifically, the IVR Pushback and Whale Tail Pushback. For both modification requests, the NPC determined that the proposed Modifications were exempt from screening by the NIRB, as the Whale Tail and IVR Pushbacks did not change the general scope or previously amended activities. Subsequently, the NWB approved the Whale Tail and IVR Pushbacks modifications, indicating the proposed modifications are consistent with the scope of activities considered under Type A Water License 2AM-WTP1830.

The current modification request (i.e., 2024 Modification) submitted by Agnico Eagle under the Type A Water License 2AM- WTP1830 includes the following activities:



- Pushback of the IVR Pit
- Continuation of the Whale Tail underground
- Expansion of the approved Whale Tail Ore Stockpile No.3

A '**Pushback**' represents an area that can be mined in a single continuous operation.

As a result of these modifications, Agnico Eagle has provided two updated management plans: Whale Tail Waste Rock Management Plan Version 13 and Water Management Plan Version 13.

CIRNAC provides the following comments and recommendations pertaining to the 2024 Modification request. A summary of the subjects of recommendations can be found in Table 1. Documents reviewed as part of this submission can be found in Table 2 of Section B. Detailed technical review comments can be found in Section C.

Table 1: Summary of Recommendations

Recommendation Number	Subject
R-01	Water Management During Closure
R-02	Flooding Sequence

B. DOCUMENTS REVIEWED AND REFERENCED

The following table (Table 2) lists the documents reviewed under the submission and references during the review.

Table 2: Documents Reviewed and Referenced

Document Title	Author, File No., Rev., Date
Meadowbank Complex - 2023 Annual Report	Agnico Eagle Mines Limited, March 31, 2024
Agnico Eagle Notice of Whale Tail 2024 Modification	Manon Turmel, Superintendent - Permitting and Regulatory Affairs, Agnico Eagle Mines Limited, May 06, 2024
Amended Water License No: 2AM-WTP1830	Nunavut Water Board, May 29, 2018
Whale Tail Mine - Water Management Plan	Agnico Eagle Mines Limited - Meadowbank Division, Version 13, May 2024
Whale Tail Mine – Waste Rock Management Plan	Agnico Eagle Mines Limited - Meadowbank Division, Version 13, May 2024
NPC Letter - Exempt from Screening	Goump Djalogue, Manger of Planning and Implementation, Nunavut Planning Commission, April 19, 2024



C. RESULTS OF REVIEW

1. Water Management During Closure

Comment:

The new Water Management Plan V13 (dated May 2024) updated section 3.10 to replace Table 3.8 of Version 12 and presents the information as a bulleted list. This updated section provides additional information for the Active Closure phase. However, it lacks details about management activities and the sequences to the beginning and last few years of active closure, as presented in Table 3.8 in Version 12 of the Water Management Plan. The activities during the operation that lead to the closure and finishing of the active closure are important to document for effective water management. Therefore, the details from Table 3.8 of Version 12 should be included in Version 13 and updated based on the new information presented in the 2024 modification request.

Recommendation:

(R-01) CIRNAC recommends that Agnico Eagle reintroduce table 3.8 from Version 12 and update the section based on the new information presented in Version 13 of the Water Management plan.

2. Flooding Sequence

Version 12 of the Water Management Plan had section 3.10.1 (Flooding Sequence), which is omitted from the updated Version 13. The updated Version 13 did not mention its omission in the document control. The flooding sequence adaptation is needed to ensure that water quality closure objectives allow for the reconnection of the lakes. Therefore, the “Flooding Sequence” section from the previous version should be included and updated in the 2024 Modification request . Note that the document control section should accurately reflect list these changes.

Recommendation:

(R-02) CIRNAC recommends that Agnico Eagle reintroduce “Section 3.10.1 Flooding Sequence” from Version 12 and update the section based on the new information presented in Version 13 of the Water Management plan.