



January 11<sup>th</sup>, 2021

Richard Dwyer  
Manager of Licensing  
Nunavut Water Board  
P.O. Box 119  
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**Re: NWB File No. 2BB-MEA1828 Opportunity to address comments received regarding Agnico Eagle Mines Ltd's "2BB-MEA1828 update of Management Plans"**

Agnico Eagle Mines Ltd (Agnico Eagle) appreciates the opportunity to provide supplementary information regarding these plans.

As requested, please find below supplementary information concerning the following topics. Should the Board agree with the information proposal, updated documents including these will be submitted.

**From CIRNAC**

1. CIRNAC recommends that AEM clarify why Quarry 1 is no longer referenced in the Quarry Management Plan. If Quarry 1 is still in use, CIRNAC recommends that AEM provide a reference to the Management Plan in which this information can be found.
2. CIRNAC recommends that AEM provide the ammonia management procedures that will be followed by operators, or provide a reference to where the approved procedures can be found.
3. CIRNAC recommends that AEM provide the surface water management strategy for eskers 7 and 7B, or provide a reference to where surface water management strategies for the site can be found.
4. CIRNAC recommends that AEM provide a waste management strategy that involves a clear labeling of waste containers during storage to distinguish all categories of waste prior to incineration or disposal.

5. CIRNAC recommends that AEM clarify the date on Appendix A part of the waste management plan to confirm the document was updated in alignment with Water Licence 2BB-MEA1828 amendment.

1. CIRNAC recommends that AEM clarify why Quarry 1 is no longer referenced in the Quarry Management Plan. If Quarry 1 is still in use, CIRNAC recommends that AEM provide a reference to the Management Plan in which this information can be found.

The same statement that is included in the Conceptual Reclamation and Closure Plan is proposed to the Nunavut Water Board to be included to the Quarrying Management Plan for Eskers 7 and 7B: "Quarry 1 authorized and used under licence 2BB-MEA1828 is now completely included within the Whale Tail Pit footprint, so this area is now covered under Water Licence 2AM-WTP1830 and by the management plan associated."

Since the recent amendment to the Water Licence 2BB-MEA1828 transferred most of the activities related to the Whale Tail Pit under the Water Licence 2AM-WTP1830, a reduction of the level of information included in the management plans associated to the water licence 2BB-MEA1828 is gradually done, including, in the present case, removal of the information related to Quarry 1.

2. CIRNAC recommends that AEM provide the ammonia management procedures that will be followed by operators, or provide a reference to where the approved procedures can be found.

After internal discussion concerning this topic, Agnico Eagle Exploration Division is not planning to use blasting techniques in these eskers, the removal of blasting and ammonia management references in the management plan is proposed to the Nunavut Water Board. The ripping of the gravel using dozer and excavator would be the only technique in the management plan.

3. CIRNAC recommends that AEM provide the surface water management strategy for eskers 7 and 7B, or provide a reference to where surface water management strategies for the site can be found and added that the previous iteration of the Quarry Management Plan (AEM, 2017) provides a description of the surface (contact) water management strategy, including collection, disposal, and other uses for the contact water. It is not clear why this information has been removed in the current version. CIRNAC considers surface water management around borrow pits and quarries to be a crucial aspect of site management.

The previous iteration of the plan described the water management exclusively for the water in the Quarry 1. Since the Quarry 1 area is now completely included within the Whale Tail Pit footprint and therefore under water licence 2AM-WTP1830, removal of the information related to Quarry 1 in the management plan was done.

The information below concerning water management at eskers is proposed to the Nunavut Water Board to be included in the management plan.

*No excavation will be done within 31 meters from a water body and beyond a depth of one meter above the high water mark or above the groundwater table. The floor of the pits will be located above the elevation of the surrounding area to promote natural drainage and avoid creating ponds. Should sedimentation from the pit occur, appropriate control measures will be installed (ex: silt fence or trench) to ensure protection of surrounding environment. Prior, during and after construction using material from a borrow pit, water flow originating from the borrow pit will be sampled according the Water Licence 2BB-MEA1828 item J14.*

4. CIRNAC recommends that AEM provide a waste management strategy that involves a clear labeling of waste containers during storage to distinguish all categories of waste prior to incineration or disposal.

Appendix A describes general waste segregation done on exploration site. Labeled waste containers, as recommended, will be used. As written in section 1 of the Waste Management Plan:

“The Amaruq exploration camp and associated infrastructures are temporarily stored at the mine site until they are reinstalled at the location described in water licence 2BB-MEA1828 amendment 1. Some of the management activities described below will be applicable once the exploration camp is reinstalled”

Since the camp reinstallation is not planned to be done in 2021. Agnico Eagle Exploration Division proposes to the Nunavut Water Board to provide an updated Management Plan, once the exploration camp is reinstalled, since the planning will be more precise at that moment and more relevant information could be included.

5. CIRNAC recommends that AEM clarify the date on Appendix A part of the waste management plan to confirm the document was updated in alignment with Water Licence 2BB-MEA1828 amendment.

Date will be modified and an updated document will be provided to the Nunavut Water Board.

David Frenette  
Environmental Coordinator