



Water Resources Division
Resource Management Directorate
Nunavut Regional Office
P.O. Box 100
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Your file - Votre référence
3AM-IQA1626
Our file - Notre référence
CIDM#1248453

April 18, 2019

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 Comments on Agnico Eagle Mines Application for Water Licence 2BE-GOT--- for Exploration and Diamond Drilling.

Dear Mr. Dwyer,

Thank you for your March 20, 2019 invitation for Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC) to comment on the new licence application, 2BE-GOT---, for diamond drilling submitted by Agnico Eagle Mines (AEM). CIRNAC examined the submission. Comments have been provided pursuant to CIRNAC's mandated responsibilities under the *Nunavut Waters and Nunavut Surface Rights Tribunal Act* and the *Department of Indian Affairs and Northern Development Act*.

1. Closure of Drill Holes

References:

- Agnico Eagle Mines, Conceptual Closure and Reclamation Plan, GOT Exploration Project, Section 5, March 2019.

AEM states the following in the Conceptual Closure and Reclamation Plan (page 8):

All drill sites will be reclaimed on an ongoing process. Following completion of a drill hole, and if possible, the casing will be pulled. If it cannot be pulled, the casing will be cut off at or below ground level. Wastewater, including drilling additives and drill cuttings will be disposed of at least 31 meters from any water body where direct flow to the water body is not possible.

No mention is made of what will happen to the drill holes once the casings are cut or pulled. Open holes can create hazards for humans and animals occupying the area, and can provide a direct path to groundwater for contaminants and spills.



Recommendation:

CIRNAC recommends that AEM further explain how the open drill holes will be reclaimed to mitigate risks of groundwater contamination and hazards.

2. CIRNAC Contact

References:

- Agnico Eagle Mines, Spill Contingency Plan, Amaraq and GOT Exploration Projects, Table 4, March 2019.

The list of external contacts includes a CIRNAC contact which is no longer up to date.

Recommendation:

Please replace the CIRNAC telephone and fax numbers with the following:

CIRNAC Manager Field Operations

Tel: 867-975-4553

Fax: 867-975-6445

3. Appendices B and C

References:

- Agnico Eagle Mines, Spill Contingency Plan, Amaraq and GOT Exploration Projects, Section 6, March 2019.

Section 6 refers to Appendices B and C for general response procedures for spilled chemical substances. Neither Appendix B nor Appendix C is attached to the Spill Contingency Plan.

Recommendation:

CIRNAC recommends attaching Appendices B and C to the Spill Contingency Plan for review.

4. General Spill Prevention Principles

References:

- Agnico Eagle Mines, Spill Contingency Plan, Amaraq and GOT Exploration Projects, Section 2.1, March 2019.



The list of general spill prevention principles ends with the following bullet (page 7):

- Provide adequate and readily available spill response materials (details on spill prevention equipment are outlined in Section 8; and

Because there is an “and” at the end of the list, CIRNAC is unclear whether more information has been left out.

Recommendation:

CIRNAC recommends clarifying if any guiding principles have been left out, and if so, providing them in the Spill Contingency Plan.

If there are any questions or concerns, please contact me at (867) 975-4282 or bridget.campbell@canada.ca.

Sincerely,

Bridget Campbell,
Water Resource Coordinator