



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

Your file - Votre référence
2BE-GOT1924
Our file - Notre référence
GCDOCS#128364727

August 06, 2024

Robert Hunter
Licensing Administrator
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 Agnico Eagle Mines Limited's 2BE-GOT1924 renewal-amendment application for the GOT and Yuka Exploration Project.

Dear Robert,

Thank you for your July 04, 2024, invitation to review Agnico Eagle Mines Limited's renewal amendment application for the GOT and Yuka Exploration Project.

Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC) examined the application 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 (867) 975-4282 or Aminul.Haque@rcaanc-cirnac.gc.ca or Andrew Keim at (867) 975-4550 or Andrew.Keim@rcaanc-cirnac.gc.ca.

Sincerely,

আমিনুল

Aminul Haque
Regional Water Management Coordinator



Technical Review Memorandum

Date: August 06, 2024

To: Robert Hunter, Licensing Administrator, Nunavut Water Board

From: Aminul Haque, Regional Water Management Coordinator, CIRNAC

Subject: Crown-Indigenous Relations and Northern Affairs Canada's Review of Agnico Eagle Mines Limited's 2BE-GOT1924 renewal-amendment application for the GOT and Yuka Exploration Project.

Region: Kitikmeot Kivalliq Qikiqtani

A. BACKGROUND

On July 04, 2024, the Nunavut Water Board (NWB) invited interested parties to comment on Agnico Eagle's renewal amendment application for the GOT and Yuka Exploration Project for the Type B water licence No. 2BE-GOT1924.

In 2024, Agnico Eagle acquired mineral properties, forming the Anuraaqtuq exploration project on Crown Lands from CIRNAC. The application requests amending water license No. 2BE-GOT1924 to expand the exploration activities to new claims areas and renew it for another five years. The project proposal is exempt from screening by the Nunavut Impact Review Board, as noted in the Nunavut Planning Commission determination letter dated April 16, 2024.

Enlarging the mineral property proposed within this renewal/amendment application includes the new Anuraaqtuq mineral property, adjustments of the previous claims, enlargement of the mineral properties GOT and Yuka, and claims expansion by CIRNAC in 2021. These properties are on the west side of the Meadowbank property, between 130 km and 150 km, mostly north of the Baker Lake community. Agnico Eagle owns this exploration project and is responsible for managing and respecting all authorizations and conditions associated with the exploration activities in the area. The exploration activities include prospecting, till sampling, geophysical surveys and diamond drilling. Workers will be accommodated at the Whale Tail campsite as no exploration camp is proposed to be installed as part of this application.

CIRNAC's Water Resource Division provides the following comments and recommendations about the application. 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	Closure of Drill Holes
R-02	Drilling Additives
R-03	Hazardous Waste Disposal
R-04	Document Control for Management Plans
R-05	Land Use Authorization

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
Application Water Licence Renewal Amendment	Agnico Eagle, June 28, 2024
NWB New Water Licence No. 2BE- GOT1924	Nunavut Water Board, May 13, 2019
NPC Letter dated April 16, 2024, re 150334 Meadowbank Regional Exploration	Nunavut Planning Commission, NPC File No.:150334, April 16, 2024
NIRB Letter dated February 4, 2018, Not a Significant Modification – screening not required	Nunavut Impact Review Board, February 04, 2018
Map Renewal-Amendment	Agnico Eagle, June 27, 2024
Non-technical Summary English	Agnico Eagle, July 02, 2024
NPC Email confirmation on April 16, 2024, determination	Nunavut Planning Commission, July 03, 2024
Conceptual Closure and Reclamation Plan V1	Agnico Eagle, March, 2019
Conceptual Closure and Reclamation Plan V2	Agnico Eagle, July, 2024
Spill Contingency Plan EXPLO_MBK complex_V13	Agnico Eagle, May, 2024



C. RESULTS OF REVIEW

1. Closure of Drill Holes

Comment:

The Conceptual Closure and Reclamation Plan_V2 (page 8) stated: *“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.”*

There is no mention 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 provide a direct path to groundwater for contaminants and spills. CIRNAC believes it is a requirement under the licence that the licensee will restore all drill holes and disturbed areas to natural conditions immediately upon completion of the drilling.

Recommendation:

(R-01) CIRNAC recommends that Agnico Eagle update the Conceptual Closure and Reclamation Plan_V2 to explain further how the open drill holes will be reclaimed to mitigate risks of groundwater contamination and hazards.

2. Drilling Additives

Comment:

The Conceptual Closure and Reclamation Plan_V2 (page 8) talks about the disposition of waste, including drilling additives. However, neither the Conceptual Closure and Reclamation Plan_V2 nor the Spill Contingency Plan EXPLO_MBK complex_V13 provided information on what kind of drilling additives will be used. Therefore, CIRNAC is uncertain whether the drill additives will be non-toxic or toxic to the environment, which may require additional measures for disposal.

Recommendation:

(R-02) CIRNAC recommends that the applicant provide the details about all drilling additives and update the associated management plan(s) to ensure environmentally safe disposal of the drilling waste if toxic drilling additives are used.

3. Hazardous Waste Disposal

Comment:

The Conceptual Closure and Reclamation Plan_V2 (page 7), under Hazardous Waste Disposal, stated: *“Contaminated soil caused by machinery hydrocarbon spills will be removed and temporarily stored in 205-litre drums or Quatrex bags and transported to the*



Whale Tail camp site....” However, the previous version (March 2019) indicated that the 205-litre drums or Quatrex bags would be stored in a Seacan until transported to the Meadowbank Mine site to avoid contact with any water. CIRNAC understands that all hazardous waste must be stored within a secondary containment boundary regardless of the storage duration.

Recommendation:

(R-03) CIRNAC recommends that the applicant ensure that all hazardous waste must be stored within a boundary of secondary containment and update the associated management plan(s) accordingly.

4. Management Plan Updates

Comment:

The applicant has updated the Conceptual Closure and Reclamation Plan and the Spill Contingency Plan EXPLO_MBK complex. However, the updates were not marked inside the documents to facilitate the review better.

Recommendation:

(R-04) CIRNAC recommends that the applicant list the updated sections and page numbers in the document control section for any updates/revisions of a plan. Also, use an arrow within the body of the plan/report and appendices to facilitate identifying changes in referenced document sections.

5. Land Use Authorization

Comment:

Section 16 of the water license amendment application mentioned that an amendment to the existing land use permit would be required for crown land due to the enlargement of the mineral properties. Therefore, before renewing the water licence, Agnico Eagle must prove it has updated land use authorization from CIRNAC to access the enlarged mineral properties included in the application.

Recommendation:

(R-05) CIRNAC recommends that Agnico Eagle obtain the updated land use permit from CIRNAC before NWB issues the renewal/amendment of the existing water license.