



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#129027360

September 03, 2024

Robert Hunter  
Licensing Administrator  
Nunavut Water Board  
P.O. Box 119  
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**Re: Crown-Indigenous Relations and Northern Affairs Canada's Reply to Agnico Eagle's Response to the 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 August 26, 2024, invitation to review Agnico Eagle's response to the technical review comments regarding the renewal amendment application of the Water Licence No: 2BE-GOT1924 for the GOT and Yuka Exploration Project.

Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC) examined Agnico Eagle's response 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's reply 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](mailto:Aminul.Haque@rcaanc-cirnac.gc.ca) or Andrew Keim at (867) 975-4550 or [Andrew.Keim@rcaanc-cirnac.gc.ca](mailto:Andrew.Keim@rcaanc-cirnac.gc.ca).

Sincerely,

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Aminul Haque  
Regional Water Management Coordinator



## **Technical Review Memorandum**

**Date:** September 03, 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 Reply to Agnico Eagle's Response to the Review of Agnico Eagle Mines Limited's 2BE-GOT1924 Renewal-Amendment Application for the GOT and Yuka Exploration Project.

**Region:**  Kitikmeot  Kivalliq  Qikiqtani

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### **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.

**Agnico Eagle's Response:**

Agnico Eagle Exploration Division will respect water licence conditions, including part I item 9: “The Licensee shall restore at all drill holes areas to natural conditions immediately upon completion of the drilling. The restoration of drill holes must include the removal of any drill casing materials and if having encountered artesian flow, the capping of holes



with a permanent seal. Where drilling casings cannot be removed the Licensee shall cut off the casings at ground level and identify with signage.”

This precision from the water licence could be added to the management plan, but as no exploration activities are currently being conducted on this mineral property and none are planned next year, we are proposing to the Board to not re-update the management plan at this time for this minor change. Agnico Eagle wants to have this licence in good standing and ready to use, but no exploration is planned in the short term on this mineral property.

### **CIRNAC’s Reply:**

Whether the licensee intends to use the licence for its intended purpose or not, all the management plans should be updated to keep the licence in good standing and ready to use. Therefore, it is irrelevant if there is no activity next year or when the licence will be used. CIRNAC reiterates its recommendation that the management plans be updated to indicate how the open drill holes will be reclaimed to mitigate risks of groundwater contamination and hazards before NWB renews the licence.

## **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.

### **Agnico Eagle’s Response:**

Agnico Eagle Exploration Division will respect water licence conditions including Part F item 2: “The Licensee shall dispose of all drill waste, including water, chips, muds and salts (CaCl) in any quantity or concentration, from land-based and on-ice drilling, in a properly constructed sump or an appropriate natural depression located at a distance of at least thirty-one (31 metres) from the ordinary High Water Mark of any adjacent water body, where direct flow into a water body is not possible and no additional impacts are created” and part F item 4 “Drilling additives or mud shall not be used in connection with holes drilled through lake ice unless they are recirculated or contained such that they do not enter the Water, or are demonstrated to be non-toxic”



This precision from the water licence could be added to the management plan, but as no exploration activities are currently being conducted on this mineral property, none are planned next year and products used in drilling can change over years, we are proposing to the Board to not re-update the management plan at this time. Agnico Eagle wants to have this authorization in good standing and ready to use, but no exploration is planned in the short term on this mineral property.

**CIRNAC's Reply:**

Whether the licensee intends to use the licence for its intended purpose or not, all the management plans should be updated to keep the licence in good standing and ready to use. Therefore, it is irrelevant if there is no activity next year or when the licence will be used. CIRNAC reiterates its recommendation that the management plans be updated to provide the details about the drilling additives and activities 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.

**Agnico Eagle's Response:**

Agnico Eagle Exploration Division will not store hazardous waste on the mineral property covered by this licence, but will transport it on an ongoing basis from its regional exploration property up to the mine site, where the mine site team will take charge of these wastes, in compliance with the management plans in place and under the mine site authorizations.

**CIRNAC's Reply:**

CIRNAC understands that the licensee is not planning to store hazardous waste on the property covered under the licence and that the existing licence also does not allow the storage of hazardous waste. However, the applicant should ensure that all hazardous



waste is stored within a boundary of secondary containment, even if it is for a short temporary period and/or used during exploration activities.

#### **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.

##### **Agnico Eagle's Response:**

The recommendations are appreciated and Agnico Eagle Exploration Division will continue to improve its overall document quality. We are proposing to the Board to not reupdate the management plans at this time for this minor change.

##### **CIRNAC's Reply:**

No further comment.

#### **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.

##### **Agnico Eagle's Response:**

Agnico Eagle Exploration Division is aware that both amended authorizations (land use permit and water licence) will be required before any exploration activities be conducted in the enlarged area. The amended land use permit application is planned to be submitted soon to CIRNAC lands administration.



As no exploration is planned in the short term on this mineral property, we wanted to let the Board specify whether the water licence amendment could be emitted or needed to be delayed until reception of the amended land use permit.

**CIRNAC's Reply:**

CIRNAC would reiterate that Agnico Eagle should obtain the land use permit before NWB issues the renewal/amendment of the existing water license.