



Water Resources Division
Resource Management Directorate
Nunavut Regional Office
P.O. Box 100
Iqaluit, NU, X0A 0H0

Your file - Votre référence
2BE-GRE1621
Our file - Notre référence
GCDocs# 95027003

June 4, 2021

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 review of the Licence Assignment application between Gold79 Mines Ltd. (formerly Aura Resources Ltd) and Aginco Eagle Mines Ltd, for the Greyhound project, Type (B) Water Licence No. 2BGRE-1621

Dear Richard,

Thank you for the May 14, 2021 invitation to review the referenced licence application, submitted by Gold79 Mines Ltd, for Type B Water Licence No. 2BE-GRE1621.

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.

If there are any questions or concerns, please contact me at (306) 501-4047 or Andrew.Keim@canada.ca.

Sincerely,

Andrew Keim,
Water Resources, Nunavut Regional Office
Crown-Indigenous Relations and Northern Affairs Canada
Andrew.Keim@Canada.ca / Tel : (306) 501-4047



Technical Review Memorandum

Date: June 4, 2021

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

From: Andrew Keim, Water Resources, CIRNAC

Subject: **Crown-Indigenous Relations and Northern Affairs Canada review of the Licence Assignment application between Gold79 Mines Ltd. (formerly Aura Resources Ltd) and Agnico Eagle Mines Ltd, for the Greyhound project, Type (B) Water Licence No. 2BE-GRE1621**

Region: ☐ Kitikmeot ☒ Kivalliq ☐ Qikiqtani

A. BACKGROUND

On October 6, 2016 the Nunavut Water Board approved a renewal License for Aura Silver Resources Ltd, 2BE- GRE1621.

In a time stamped, undated letter located on the Nunavut Water Board (NWB) FTP site a notification to the NWB from John Mc Neice of Aura Silver Resources Ltd identified Mr. David Frenette, Environment Coordinator at Agnico Eagle Mines Ltd (AEM) is authorized by Aura Silver Resources Inc. to act as their representative with respect to matters relating to Water License No. 2BE-GRE1416, the Greyhound project.

On the 15th of November, 2018 Aura Silver Resources shareholders approved a name change and stock consolidation for the company. The company's new name was identified as "Aura Resources Inc." Aura Resources Inc. then changed its name to Gold79 Mines Ltd. on August 4, 2020.

On May 12, 2021 the NWB received an application from Gold79 Mines Ltd. for the assignment of 2BE-GRE1621 to Agnico Eagle Mines Ltd and identified Olivier Grondin of AEM as the responsible party.

CIRNAC provides the following comments and recommendations pertaining to the application for assignment. Documents reviewed as part of this submission can be found in Table 1 of Section B. Detailed technical review comments can be found in Section C.



B. DOCUMENTS REVIEWED

The following table (Table 1) provides a summary of the documents reviewed under the submission.

Table 1: Documents Reviewed

Document Title	Author, File No., Rev., Date
Documents Submitted as part of the Application	
Renewal License 2BE-GRE1621	Nunavut Water Board October 6, 2016
Email- Aura Silver Authorization of Agnico Eagle Mines Ltd to act as Representative.	Aura Silver – Undated – NWB FTP time stamped 07/07/2016
Public Notice of Assignment Application	Nunavut Water Board –May 14, 2021
Application for Assignment and Declaration of Licensee (Assignor)	Derek MacPherson – May 5, 2021
CERTIFIED EXTRACT OF RESOLUTIONS OF THE BOARD OF DIRECTORS OF AGNICO EAGLE MINES LIMITED	Chris Vollmershausen, On behalf of Agnico Eagle Mines Ltd, January 11, 2021
Nunavut Business Corporations Act Annual Return – Extra-Territorial Corporations	John Mc Neice, CFO- Gold79 Mines Ltd.. Dec 24, 2020
Notice of Articles- Certificate of Name Change Business Corporations, Office of the Registrar , Province of British Columbia	Carol Priest – Registrar of Companies August 4 , 2020.
Supporting Documents Reviewed by CIRNAC	
Assignment Distribution Review	Nunavut Water Board, Richard Dwyer, May 14, 2021
2019-KIV22-CW N2015C0031 Land Use Permit Inspection	Christine Wilson – Inspector- September 12, 2019
151126 2BE—GRE1416 Water license Inspection Report	Christine Wilson – Inspector- October 15, 2015



C. RESULTS OF REVIEW

1. Review of requirements for submission of Application for Assignment

Comment:

The Nunavut Water Board published an Application for Assignment and Declaration of Licensee ¹ includes a guide and list of the required documents to be filed in support of such an application. This list was reviewed as part of the submission by the licensee for review in consideration of the assignment of 2BE-GRE1621.

The list outlines following:

Required Documents	Status
<ul style="list-style-type: none">Completed Application for Assignment and Executed Declaration of Licensee (Assignor).	<ul style="list-style-type: none">Complete
<ul style="list-style-type: none">Executed Undertaking of Proposed Assignee and Affidavit of Execution – Undertaking of Proposed Assignee.	<ul style="list-style-type: none">Missing signature and stamp of Public Notary from the province of Quebec.
<ul style="list-style-type: none">Copies of all documents pertaining to the lease, sale, rental or other disposition of the property or the licence from one party to another.	<ul style="list-style-type: none">Not present
<ul style="list-style-type: none">Statement of financial responsibility of the assignee.	<ul style="list-style-type: none">A signed copy of the Option Agreement between the licensee and Agnico Eagle Mines Ltd. was not provided.
<ul style="list-style-type: none">For licences which require the provision of security, a letter to the NWB from the Manager of Water Resources, Indian and Northern Affairs Canada (INAC).	<ul style="list-style-type: none">Not required / Applicable
<ul style="list-style-type: none">An updated financial security assessment.	<ul style="list-style-type: none">Not required / Applicable
<ul style="list-style-type: none">A letter from each Designated Inuit Organization (DIO) and existing or other water users confirming that the proposed assignment does not negatively impact any existing water compensation agreement(s).	<ul style="list-style-type: none">Not present

¹ Application for Assignment, Nunavut Water Board, 2013 [Assignment Application](#)



<ul style="list-style-type: none">• Statement of assignee's capacity to implement the conditions of the water license and a schedule for the implementation of all plans, manuals and reports.	<ul style="list-style-type: none">• Not present
<ul style="list-style-type: none">• \$30.00 CDN application fee payable to the Receiver General for Canada	<ul style="list-style-type: none">• Confirmation of payment indicated

The Nunavut Water Board publishes an Application for Assignment guide for use by Licensee's. The application appears to be incomplete. In particular, CIRNAC is concerned that information regarding the assignee's capacity to implement the conditions of the water license and a schedule for the implementation of all plans, manuals and reports, has not been provided and that the acknowledgement from the Designated Inuit Organizations has not been provided in the submission.

Recommendation:

(R-01) CIRNAC recommends that the Nunavut Water Board seek clarity from the Licensee that the application package as submitted is complete, and that the assignee (AEM) confirm their capacity to implement the conditions of the water license and a schedule for the implementation of all plans, manuals and reports.