



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

Your file - Votre référence
3AM-IQA1626
Our file - Notre référence
CIDM# 1243175

March 4, 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 (CIRNAC) comments on the Agnico Eagle Revised Spill Contingency Plan and Revised Abandonment and Restoration Plan under Exploration Water Licence No. 2BE-GRE1621.

Dear Mr. Dwyer,

Thank you for your February 4, 2019 invitation to comment on Agnico Eagle's revised Spill Contingency Plan (Spill Plan) and revised Abandonment and Restoration Plan (A&R Plan), under Exploration Water Licence No. 2BE-GRE1621.

CIRNAC examined the submissions. Comments are 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*. This project was formally operated by Aura Silver. Aura Silver Resources Inc. and Agnico Eagle Mines Ltd. entered into an Option Agreement on June 1st, 2014. Agnico Eagle is currently the operator of the project.

Spill Contingency Plan

References:

- Agnico Eagle, Spill Contingency Plan, Greyhound and White Hills Exploration Projects, February 2019.

1. Update CIRNAC Contact Information and Acronym

Throughout the document, there is an inconsistency in the use of acronyms INAC and CIRNAC, which may lead to some confusion at a time when a response must be timely.



The legal name of the Minister of this Department is “Minister of Indian Affairs and Northern Development Canada” and is to be used in legal documents. However, the Department is currently known as Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC).

Recommendation:

CIRNAC requests that Agnico Eagle please use the acronym CIRNAC to refer to the Department in all cases apart from legal documents. Please Update the CIRNAC contact Information to:

Crown-Indigenous Relations and Northern Affairs Canada – Field Operations Division
Director, Lands and Field Operations: Erik Allain
Qimugjuk Building
PO Box 2200
Iqaluit, NU
X0A 0H0
Tel: (867) 975-4295
Fax: (867) 979-6445

2. Relevance to Greyhound Property

Part H of Water Licence No. 2BE-GRE1621 states that the updated Spill Contingency Plan “Shall be specific to the Greyhound Property.” The Figure 2 Procedure Schematic demonstrates procedures to respond to spills on a winter road. Section 7 of the Spill Plan describes a Potential Spill Analysis on the winter road between the Meadowbank Mine and the Amaruq Project. These references are not specific to the Greyhound Project area and/or are outdated, as the road which runs through the Greyhound Project area is an all-weather road, and the Amaruq Project (Whale Tail Project) is not within the Greyhound Project area.

Recommendation:

CIRNAC recommends updating these references to the winter road and replacing them with relevant and current site descriptions and spill procedures which are specific to the Greyhound Property.

3. Appendices Missing from Spill Plan

Appendices B and C are referenced in Section 6 of this document as General Response Procedures for Spilled Chemical Substances, but they are not attached to the document.

Recommendation:

CIRNAC requests that Appendices B and C be attached to the Spill Contingency Plan.



Abandonment and Restoration Plan

References:

- Agnico Eagle, Conceptual Closure and Reclamation Plan, Greyhound Exploration Project, February, 2019.
- PwP Consulting of behalf of Aurora Silver Resources Inc., Updated Abandonment and Restoration Plan, Greyhound Project, May, 2014.

1. Reclamation of Drill Sites

Section 6: Reclamation of Drill Sites of the updated A&R plan provides fewer reclamation details than the previous version of the A&R Plan from 2014. The plan states that drill casings will either be pulled or cut, and that cuttings will be disposed of more than 31m away from water bodies. There is no mention of capping or filling the drill holes, inspections of the site for chemical contamination, clean up of chemicals, or the location and methods of cuttings disposal.

Recommendation:

CIRNAC requests further details of steps to be taken to fully reclaim the drill sites.

2. Fuel Cache and Chemical Storage

The previous version of the A&R Plan from 2014 mentions fuel caches and chemical storage while the 2019 version does not. It is understood that no permanent infrastructure will be installed on site; however there is no mention of temporary storage units such as fuel drums.

Recommendation:

CIRNAC requests clarification on whether the fuel cache and chemical storage referenced in the 2014 A&R Plan have been removed from the Greyhound site and, if so, how they have been reclaimed.

If there are any questions or concerns, please contact me at (867) 975-4282 or bridget.campbell@canada.ca or Godwin Okonkwo at (867) 975-4550 or godwin.okonkwo@canada.ca.

Sincerely,

Bridget Campbell, Water Resource Coordinator