



Water Resources Division  
Nunavut Regional Office  
Iqaluit, NU X0A 0H0

December 29, 2010

Phyllis Beaulieu  
Manager of Licensing  
Nunavut Water Board  
PO Box 119  
Gjoa Haven, NU X0A 1J0

**Re: 2BE-MEP0813 – Meliadine East Project – Comaplex Minerals Corp. –  
Amendment Application**

Please be advised that Indian and Northern Affairs Canada (INAC) has completed a review of the above noted application for amendment.

The Nunavut Water Board (NWB) distributed the application for comment on December 2, 2010.

In conducting this review, I have referred to all documents on the Nunavut Water Board FTP site as it relates to 2BE-MEP. Attached is a Technical Review Memorandum for your consideration.

Please feel free to contact me should you have any questions or comments. I can be reached at (867) 975-4566 or by email at [tanya.trenholm@inac.gc.ca](mailto:tanya.trenholm@inac.gc.ca).

Sincerely,

*Original signed by*

Tanya Trenholm  
Pollution Policy Specialist



## Technical Review Memorandum

**To:** Phyllis Beaulieu, Manager of Licensing - Nunavut Water Board

**From:** Tanya Trenholm, Pollution Policy Specialist - Indian and Northern Affairs  
Canada – Water Resources Division

**Re: 2BE-MEP0813 – Meliadine East Project – Comaplex Minerals Corp. –  
Amendment Application**

### Background:

On July 6<sup>th</sup>, 2010, Agnico-Eagle Mines Ltd (AEM) completed a take over of Comaplex Minerals Corp. (now a wholly owned subsidiary of AEM). AEMs acquisitions included both the Meliadine West and Meliadine East Projects.

Comaplex has requested an amendment to the above noted water licence for an increase in water use from 30 m<sup>3</sup> / day to 299 m<sup>3</sup>/day, citing the additional water is required to run 5 drills with the capacity for consuming up to 53 m<sup>3</sup>/day of water.

In addition to a more comprehensive drilling program, AEM has removed and relocated the existing camp and majority of related infrastructure permitted via licence 2BE-MEP0913 to the Meliadine West site, which is permitted by 2BB-MEL0914. No staff will be housed on the Meliadine East Property.

In concert with the amendment application, AEM has submitted an updated 'Abandonment and Restoration Plan' and a 'Spill Contingency Plan' which AEM has indicated will apply to both water licences (2BB-MEL0914 and 2BE-MEL0813).

On November 18, 2010 in Yellowknife, AEM made a presentation which indicated that the 2011 bulk sample program would focus on "extracting a bulk sample that is more representative of the entire Tiriganiaq deposit" which is located on the Meliadine West property, under the 2BB-MEL0914 licence.

Additionally, timelines were presented which reflected mine construction beginning in 2013, and production start up in 2015.

Comaplex has applied for an increased use of water under their Meliadine East water licence citing that activities on this mineral claim will occur to confirm mineral resources.

The application also states that in 2009, Meliadine East was purchased by Comaplex with the intent of developing the Discovery Gold deposit as part of the



larger Meliadine Gold Project. The application refers to the name of this project as 'the Meliadine Gold Project, formerly Meliadine East'.

Whereas AEM is looking to conduct a more expansive drilling programme on its Meliadine East and West Projects, it would appear that drilling activities are occurring on 2 sites for the purposes of carrying out one project. Additionally, AEM would be in possession of 2 water licences which would collectively permit the use of 589 m<sup>3</sup>/ day of water.

## **Recommendations / Comments**

### NIRB Screening:

A review of the NIRB screening for the Meliadine West proposed bulk sample revealed that the only property included in the screening was drill locations related to water licence 2BB-MEL0914 on the Meliadine West Project area.

Comaplex has applied to the NWB for an amendment to their water licence 2BE-MEP for use of water up to 299 m<sup>3</sup>/day to operate 5 additional drills on the Meliadine East property.

Accordingly, INAC has concerns that drilling activities proposed for the Meliadine East site have not been included as part of the original NIRB screening of the proposed bulk sample.

### Summary:

In summary, INAC has the following concerns:

- The application refers to the name of this project as 'the Meliadine Gold Project, formerly Meliadine East', thereby inferring that the 2 properties (Meliadine East and West) should now be considered one. The proponent should clarify if the Meliadine West and East projects should be considered one larger project, or two separate projects.
- The proposed, combined water use for the 2 licences would be 589 m<sup>3</sup>/ day, well in excess of the threshold for a Type B licence.
- It is not clear where the proposed drilling locations are on the Meliadine East property and the amount of drilling that will occur in relation to the discovery deposit for which the amendment was requested. The proponent must provide proposed drill locations, and include GPS coordinates.
- Uncertainty surrounding the scope of the previously screened project is of concern. If activities related to Meliadine East (water licence 2BE-MEP0813) were not included in the original NIRB screening, this should be addressed prior to the NWB considering the amendment application.



INAC recommends that the above noted information must be submitted prior to the Board considering the amendment application. As such, INAC would like to respectfully recommend that the Board consider the amendment application premature until certainty around the items of concern noted above, particularly confirmation of scope/NIRB screenings and the appropriateness of a Type B water licence can be fully addressed.

Please feel free to contact me at your convenience should you wish to further discuss any part of this submission to the Board. I can be reached at 867-975-4566 or via email, [tanya.trenholm@inac.gc.ca](mailto:tanya.trenholm@inac.gc.ca).

Cc. Lou-Ann Cornacchio, Manager, Water Resources Division – Indian and Northern Affairs Canada;