



Crown-Indigenous Relations
and Northern Affairs Canada

Relations Couronne-Autochtones
et Affaires du Nord Canada

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

Your file - Votre référence
2BE - MEP1318
Our file - Notre référence
CIDM#1227164

September 13, 2018

Richard Dwyer
Licence Administrator
Nunavut Water Board
P.O. Box 119
Gjoa Haven, NU, X0B 1J0
Sent via e-mail: licensing@nwb-oen.ca

**Re: Crown-Indigenous Relations and Northern Affairs Canada's comments on
Agnico Eagle Mines Ltd.'s Application for Licence Renewal for Meliadine
East Project (Water Licence 2BE-MEP1318)**

Dear Mr. Dwyer,

Thank you for your August 14, 2018 invitation to review Agnico Eagle Mines Ltd.'s renewal of the above mentioned water licence. The Water Resources Division of Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC) examined the request and the results of our review are provided in the enclosed memorandum for the Nunavut Water Board's consideration. Comments have been 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*.

CIRNAC appreciates the opportunity to participate in this review. If there are any questions or concerns, please contact either me at bridget.campbell@canada.ca or (867) 975-4282 or Ian Parsons at (867) 222-9278 or ian.parsons@canada.ca.

Sincerely,

Bridget Campbell
Water Resources Coordinator

Technical Review Memorandum

To: Richard Dwyer, Licence Administrator, Nunavut Water Board

From: Bridget Campbell, Water Resource Coordinator, Water Resources Division,
CIRNAC

CC: David Frenette, Environmental Coordinator, Agnico Eagle Mines Ltd.
Ian Parsons, Manager, Water Resources, CIRNAC
Justin Hack, Manager of Field Operations, CIRNAC

Date: September 13, 2018

Re: **Agnico Eagle Mines Application for Licence Renewal for Meliadine East Project (Water Licence 2BE-MEP1318)**

Applicant: Agnico Eagle Mines
Project: Meliadine Project
Region: Kivalliq

A. BACKGROUND

On August 1, 2018, Agnico Eagle Mines Ltd. (AEM) submitted the above-mentioned application for the renewal of the Type B water licence 2BE-MEP1318 for the Meliadine East Project. This licence allows AEM to conduct exploration activities where they also have valid land use permits. Agnico Eagle maintains a land use licence with the Kivalliq Inuit Association and a land use permit with Indigenous and Northern Affairs Canada authorizing exploration activities in the area. The Meliadine East Project exploration areas are located mostly north and northwest of the Rankin Inlet community. The renewal covers the same exploration activities that were covered under this licence and includes no modifications to existing terms and conditions of the current water licence. Exploration activities in this area are sporadic and include camp operation, fuel storage, and mineral exploration (prospecting, geological mapping, geophysical surveys, diamond drilling, baseline data collection, and trenching). The 2017 Annual Report specifies that no activities were carried out under this licence in 2017.

B. RESULTS OF REVIEW

The Water Resources Division of Crown-Indigenous Relations and Northern Affairs Canada's (CIRNAC) Nunavut Regional Office reviewed the documents associated with AEM's renewal application and would like to provide the following comments and recommendations for the Board's consideration.

1. Management plans not updated

Reference:

- Interim Reclamation and Closure Plan, Water Licenses 2BE-MEP1318 and 2BB-MEL0914, Agnico Eagle Mines Ltd., Meliadine East Gold Project, August 2013

Comment:

In response to new and changing activities on site, management plans should be updated to reflect those activities. CIRNAC recognizes that there was a lack of activity under this licence, since drilling last occurred in 2014, therefore management plans have not required updates. However, CIRNAC expects updated management plans with the return of activities on site.

An interim management plan, on the other hand, is designed to be active for only a provisional or temporary amount of time. The Interim Reclamation and Closure Plan, submitted in 2013, has not been updated in the past five years.

Recommendation:

CIRNAC recommends that AEM updates the Reclamation and Closure Plan prior to renewal of this licence. Further, CIRNAC recommends that AEM updates the Spill Contingency Plan and the Abandonment and Restoration Plan as exploration and drilling activities evolve.