



Water Resources Division
Resource Management Directorate
Nunavut Regional Office
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Your file - Votre référence
2BE-PTR1621
Our file - Notre référence
GCdocs # 98742812

November 16, 2021

Mr. Richard Dwyer
Manager of Licensing
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 Comment on
Agnico Eagle Mine Ltd.'s Application for Renewal of Type B Water Licence
No. 2BE-PTR1621 for Peter Lake and Fox Lake Project.**

Dear Mr. Dwyer,

Thank you for your October 27, 2021 invitation to review the Type B water licence 2BE-PTR1621 renewal application, submitted by Agnico Eagle Mine Ltd.(AEM) on October 14, 2021.

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.

CIRNAC appreciates the opportunity to participate in this review. If there are any questions, please contact me at (867) 975-4738 or vincent.okonkwo@rcaanc-cirnac.gc.ca or Andrew Keim at (867) 975-4550 or andrew.keim@rcaanc-cirnac.gc.ca

Sincerely,

Vincent Okonkwo
Senior Environmental Assessment Specialist



Technical Review Memorandum

Date: November 16, 2021

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

From: Vincent Okonkwo, Senior Environmental Assessment Specialist, CIRNAC

Subject: Crown-Indigenous Relations and Northern Affairs Canada's Comment on Agnico Eagle Mine Ltd.'s Application for Renewal of Type B Water Licence No. 2BE-PTR1621 for Peter Lake and Fox Lake Project.

Region: ☐ Kitikmeot ☒ Kivalliq ☐ Qikiqtani

A. BACKGROUND

The Peter and Fox Lakes project is located on the Inuit Owned Land and Crown Land between 40 and 140 kilometers (Km) northwest from Rankin Inlet community within the Kivalliq region.

The applicant intends to continue the conduct of exploration activities for gold mineralization. The scope of the previous activities includes:

- Drilling approximately 30 holes per year between a depth of 150 to 250 meters on average. The number of drill holes and depth could be adjusted depending on the results obtained during the drilling program
- Aerial geophysical survey, prospecting and diamond drilling (on-land and on-ice drilling activities);
- Use of existing facilities at Meliadine site for the approximately 10 staff for approximately 30 days a year;
- Helicopters will be used to move drills, fuel, equipment and workers;
- Use of water from local ponds or lakes for drilling activities;
- Use and storage of fuel from the existing Meliadine site for drilling activities with up to 40 L of gasoline, 3600 L of diesel, 2050 L of jet fuel and 200 pounds of propane stored at each active drill site;
- Use and storage of hazardous materials and chemicals including drilling additives with the associated wastes (hazardous and non-hazardous) returned to the Meliadine camp daily for proper disposal; and
- Completion of ongoing archaeological investigations within the planned exploration area.



AEM is applying to renew their expiring Type B water Licence 2BE-PTR1621 for the continuation of the Peter Lake and Fox Lake exploration activities, with no plans for modifications. The water licence was originally issued on March 4, 2016 for the same purpose.

CIRNAC provides the following comments and recommendations pertaining to the Type B Water Licence 2BE-PTR1621 application for renewal submitted October 14, 2021.

Table 1: Summary of Recommendations

Recommendation Number	Subject
R-01	Abandonment and Reclamation Plan
R-02	Spill Contingency Plan
R-03	Application for Water Licence Renewal Document

B. RESULTS OF REVIEW

1. Abandonment and Reclamation Plan (ARP)

Comment

In comment number 2 of the Indigenous and Northern Affairs Canada (INAC) now CIRNAC February 19, 2016 review of AEM application for new Type B water licence, CIRNAC recommended that the licensee provide Abandonment and Reclamation Plan (ARP) to demonstrate how they intend to clean up the drill sites at the end of the exploration activities.

Although, no camp activities was authorized under the existing licence as contained in Part E, Item 1 of Type B water licence 2BE-PTR1621, drill wastes generated at drill sites and drill holes require remediation. The ARP is an important document that will ensure the disturbed exploration sites are remediated and returned to its stable state prior to the exploration activities.

Recommendation

(R-02) CIRNAC recommends that the Licensee provide an ARP to demonstrate how they intend to remediate drill sites at the end of the exploration activities.



2. Spill Contingency Plan

Comment

CIRNAC note in section 4.10, Table 5 of the updated Spill Contingency Plan (SCP) that the CIRNAC contact details was updated but the Organization/Authority column remain "INAC inspector".

Recommendation

(R-03) CIRNAC recommends that Licensee update:

- Organization/Authority information column in Table 5, Section 4.10 of the updated SCP to read CIRNAC inspector; and
- Document control section of Table 1 to reflect the change.

3. Application for Water Licence Renewal Document

Comment

CIRNAC note that Application for the Water Licence Renewal document was dated April 2013. It could be understood that April 2013 was the last update on the document as contained in the document management page, but the renewal application was submitted to the board on October 14, 2021.

CIRNAC is of the view that the application document should reflect the date of submission to the board October 14, 2021 as the Water Licence Application date.

CIRNAC also noted that sections 13, 14 and 15 of the application document were not duly completed.

Recommendation

(R-04) CIRNAC recommends that the licensee:

- Update the application form to reflect October 14, 2021 as the Application date for the Type B Water licence;
- Complete sections 13 of the Type B Water Licence Application form to show:
 - sources of the water withdrawal with locations on a map; and
 - quality of water sources and available capacity.
- Complete section 14 to show the types of wastes generated and deposited;
- Completed section 15 to describe the composition, quantity in m³/day, method of treatment and method of disposal of the wastes mentioned in section 14; and
- Provide the outstanding information in sections 13, 14, and 15 prior to the issuance of water licence.



C. REFERENCES

Department of Crown-Indigenous Relations and Northern Affairs Act. (2019).

Nunavut Waters and Nunavut Surface Rights Tribunal Act. (2016).

Nunavut Water Board, March 4, 2016: Type B Water Licence No: 2BE-PTR1621, P 7