



ALAMOS GOLD INC.  
LYNN LAKE

## Memo

To: Mark Ardis, Analyst (acting) Decision Statements, National Programs Division  
Impact Assessment Agency of Canada

From: Michael Raess, Manager, Environment, Lynn Lake Gold Project

CC:

Date: April 7, 2025

Re: Comments and Feedback on the Draft Analysis Report and Proposed Amended  
Decision Statement for the Lynn Lake Gold Project - Gordon  
Mine Pit Dewatering Notice of Alteration / Notice of Change

Please find below our comments and feedback on the draft analysis report and the proposed amended Decision Statement for the Lynn Lake Gold Project, based on the submitted Lynn Lake Gold Project: Gordon Mine Pit Dewatering Notice of Alteration / Notice of Change.

We would appreciate consideration of the changes outlined and recommended, based on the rationale provided.

Document	Location Reference	Comment/Rationale
Analysis of Proposed Change to the Lynn Lake Gold Project – Pit Dewatering Report	Section 1: Introduction	March 6, 2023 is incorrect. Change date to March 5, 2023 to correspond to linked Decision Statement.
		July 2024 amended decision statement – suggest adding full date of July 26, 2024 for consistency to other dates listed in section.
	Section 2: Proponent's Project Change	“dewatering would occur over a period of three months during the operation phase....” This is incorrect. Dewatering will occur over a period of approximately three months during the CONSTRUCTION phase. Change “operation” to “construction”.
	Section 6: Conclusion	1. “2023 environmental assessment” should be 2020 environmental assessment

Document	Location Reference	Comment/Rationale
Amended Federal Decision Statement (Proposed)	Condition 3.6	<p>Wording is very awkward. Change requested.</p> <ul style="list-style-type: none"> <li>• Current: The Proponent shall adjust, when releasing water into the receiving environment, the rate of release of water into the Hughes River from dewatering the East and Wendy pit lakes, and into Farley and Gordon Lakes (should be plural) from groundwater intercepted pursuant to condition 3.4 in order to maintain water levels in these receiving systems within range of natural variability predicted in Lynn Lake Gold Project: Gordon Mine Pit Dewatering... and Volume 2...</li> <li>• Proposed: <b>“The Proponent shall adjust the rate of release of water into the Hughes River from dewatering the East and Wendy pit lakes and into Farley and Gordon Lakes from groundwater intercepted (pursuant to condition 3.4), to maintain water levels in these receiving systems within range of natural variability predicted in Lynn Lake Gold Project: Gordon Mine Pit Dewatering... and Volume 2...”</b></li> </ul>
	Condition 3.12.3 (new)	<p>Reference is to the monitoring plan for the Hughes River (NOC-02-02-D). This plan has been updated and so we ask that the reference be to the “Lynn Lake Gold Project: Monitoring Program for Gordon Pit Dewatering to the Hughes River (Version 1)”, which includes further details to avoid sediment entrainment and has committed monitoring before, during, and up to 1 month after dewatering. Reference to the current updated plan will make sure that there is a clear end to monitoring the activity. Alternatively, wording in condition can state “..during, through, and up to one month after...”</p>
	Condition 3.13.1 (new)	<p>As written, this condition now requires Alamos to monitor flows in the Hughes River <u>during all phases of the Designated Project</u>. This does not make sense given the Hughes River will only receive water during construction and the specific dewatering activity. Request change such that the Hughes River is monitored <u>as outlined in the “Lynn Lake Gold Project: Monitoring Program for Gordon Pit Dewatering to the Hughes River (Version 1)”</u>. This will also align with the SWMMP.</p>

Document	Location Reference	Comment/Rationale
		To be consistent with edits to Condition 3.12.2, <a href="#">3.12.2.1</a> , and <a href="#">3.12.2.2</a> , Condition 3.13.1 should exclude monitoring water levels in East and Wendy pits during all phases of the Designated Project; the pits will be dry once they are dewatered.
	Condition 3.14.4	<p>This condition now includes monitoring fish habitat quality and quantity end points in the Hughes River, <u>starting prior to construction and during all phases of the Designated Project</u>. The AEMP includes benthic invertebrate, chlorophyll a and water temperature monitoring end points in the Hughes River but only during years -2, -1 of construction and Year 1 of operation. Adjustment to this condition is requested for alignment to the AEMP.</p> <ul style="list-style-type: none"> <li>Proposed: “monitor, starting prior to construction and during all phases of the Designated Project, fish habitat quality and quantity end points for all species identified pursuant to condition 3.14.3, in Farley Creek, Farley Lake, Gordon Lake, the Keewatin River, Minton Lake, the new diversion channel, fish-bearing wetlands within and downstream of the Project development areas, and any additional locations identified in consultation with Indigenous groups and relevant authorities, <b>as well as in the Hughes River during Years -2 and -1 of the Construction phase and Year 1 of the operations phase.</b></li> </ul>

Additionally, we ask that other changes to Condition 3.12.2 and 3.13.1 be completed that better align with the SWMMP. For example:

- a. we don't want to sample Arbor Lake and would instead like to use Carr Lake as a reference for Minton and Payne lakes (reconnaissance has confirmed it is more suitable).
- b. Provide rationale for monitoring pH at the hydrometric stations identified in Condition 3.13.1 as this does not make sense to us.