

File: 1AR-POL0311/TR/B6/H

November 7, 2014

Bruce Donald Manager Dormant Properties Teck Resources Limited Bag 2000 Kimberley, B.C.V1A 3E1

Email: bruce.donald@teck.com

Subject: Licence No. 1AR-POL0311, Teck Resources Limited - Annual and Quarterly

Reports Technical and Administrative Review

Dear Mr. Donald:

The Nunavut Water Board ("NWB") has completed a technical and administrative review of the reports and documents, submitted under Licence No. 1AR-POL0311 during the term of the Licence.

The Water licence issued established an in-depth monitoring program in order to assist on the assessment of the site physical and chemical stability. Site monitoring data is fundamental to evaluate the site conditions and to help in the closure planning and understanding the status of closure issues. Accordingly, the water licence 1AR-POL0311 included requirements for annual sampling under Part H "Conditions Applying to the Monitoring Program"; likewise, the Licensee is required under Part B Item 6 (viii) (c) to submit an annual report summarizing the results of the monitoring program generated under Part H.

The integrity of this monitoring data is of critical importance to adopt the best decisions moving forward to a long-term monitoring plan. With that in mind, the Board had reviewed the monitoring data and presents its findings with the intention that this information be used to evaluate the Licensee's request for reduction of monitoring at the site and also to provide Teck with an opportunity to fill the gap where possible.

After review the monitoring data, the NWB concluded that there is information that is not on file that was required to be resubmitted by Teck, i.e. it was either acknowledged as submitted by Teck however it could not be located, or there were issues that prevent its use (illegible); and information which is not been submitted. The following summarizes the main findings with respect to submissions required by the appropriate Licence conditions.

Monitoring Data to be Re-Submitted by Teck:

Garrow Lake Stratigraphic Monitoring:

- Garrow Lake Centre and South stations (stations 262-3 and 262-3a, respectively) Monitoring data:
 - May 2004, Maximum Ice Thickness Monitoring event: temperature, pH, conductivity and dissolved oxygen data (reported as "GLL to supply data tests were conducted as required" on the 2004 Annual Monitoring Report);
 - o May 2005, Maximum Ice Thickness Monitoring Report: none of lab analysis data are on file, just QC data (duplicate and detection limits);
 - o May2006, Maximum Ice Thickness Monitoring Report; lab analysis <u>data results are illegible</u>

Annual Geotechnical Inspection Report:

• 2010 3rd Quarter Report, Appendix 7, "2010 Annual Geotechnical Inspection" by Golders Associates, Report is not in file.

Monitoring data not on file:

Garrow Lake Stratigraphic Monitoring:

- Garrow Lake Center Water quality monitoring (station 262-3):
 - o 2003, Mid-Winter and Maximum Ice Thickness monitoring events: full metal MS-ICP¹, and cyanide data;
 - o 2003, Maximum Melt Monitoring data;
 - o 2004, Maximum Melt Monitoring data;
 - o 2005, Maximum Melt Monitoring event: cyanide monitoring data;
 - o 2005 2006, 2007, 2008, 2009, 2010 and 2011 Mid-Winter monitoring data;
 - o 2007 Maximum Ice Thickness monitoring event: temperature, cyanide, and dissolved oxygen data;
 - o 2008 Maximum Ice Thickness monitoring event: temperature, dissolved oxygen and cyanide monitoring data;
 - o 2008, Maximum Ice Melt monitoring event, cyanide data;
 - o 2011 Maximum Ice Thickness monitoring data.
- Garrow Lake South Water quality monitoring (station 262-3a):
 - o 2003 Mid-Winter, Maximum Ice Thickness and Maximum Melt monitoring data;
 - o 2004, Maximum Melt Monitoring data;
 - o 2005, Maximum Melt Monitoring event: cyanide monitoring data;
 - o 2005, 2006, 2007, 2008, 2009, 2010 and 2011 Mid-Winter monitoring data;
 - 2007, Maximum Ice Thickness monitoring event: temperature, cyanide, and dissolved oxygen data;
 - o 2008 Maximum Ice Thickness monitoring event: temperature, dissolved oxygen cyanide monitoring data;
 - o 2008, Maximum Ice Melt monitoring event: cyanide data;
 - o 2011 Maximum Ice Thickness monitoring data.

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¹ Except for zinc and lead data which were reported.

Effluent Monitoring and Receiving Environment Monitoring from Final Discharge Point, FDP):

- Water quality data for receiving environment from Final Discharge Point (FDP, station 262-7a):
 - o 2006, 2007, 2008, and 2009 monitoring data;
 - o 2011 field temperature not in file.
- Effluent monitoring data:
 - o 2010 field temperature not in file;
 - o 2011 field temperature not in file.

Annual Geotechnical Inspection Reports:

• 2004 Annual Geotechnical Inspection Report.

Pursuant s. 48(2) of the *Nunavut Waters and Nunavut Surface Tribunal Act* the NWB retains the right to request additional information and studies, further to this; the Board invites Teck to provide a response, no later than November 14, 2014, addressing the above issues.

Should you have any further questions, please feel free to contact Sonia Aredes, Technical Advisor by email at sonia.aredes@nwb-oen-ca or David Hohnstein, Director of Technical Services by e-mail to David.Hohnstein@nwb-oen.ca.

Yours truly,

Original Signed by;

Sonia Aredes Technical Advisor Nunavut Water Board

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