



95 Wellington Street
Suite 1010
Toronto, Ontario
M5J 2N7
416-628-0216

February 10, 2017

Tara Arko
Director of Technical Services
Nunavut Impact Review Board
29 Mitik Street
P.O. Box 1360
Cambridge Bay, NU, X0B 0C0

Re: TMAC Response to GN's Extension Request for Information Request Period

Dear Ms. Arko,

This letter is in response to the above noted correspondence received February 8, 2017, in which TMAC was informed that the Government of Nunavut (GN) and all intervening parties had been granted a one week extension to the February 17, 2017 deadline for submission of Information Requests (IRs) on the Madrid-Boston (Phase 2) Draft Environmental Impact Statement (DEIS) and draft Type A Water Licence Application. Our understanding is that the Nunavut Impact Review Board (NIRB) granted this extension on the basis that "all the necessary GN technical personnel" did not receive the DEIS until January 30, 2017.

GN's extension request on this basis is surprising and disappointing to TMAC, as we made significant efforts in this case to support the party in meeting process deadlines established by NIRB. As you are aware, electronic copies of the DEIS were posted to the NIRB public registry and readily available as of January 18, 2017. As required by NIRB, the DEIS was posted in sections to accommodate access by Northern users. TMAC also provided copies of the DEIS to all GN representatives (as confirmed by Canada Post tracking numbers) on the NIRB Distribution List and these materials were delivered on the dates outlined below:

| Document description | NIRB Distribution List GN Representative | Date Delivered |
|--------------------------------------|---|-----------------------|
| 1 hard copy and 12 electronic copies | Lou Kamermans | January 25, 2017 |
| 3 electronic copies | Sylvie LeBlanc | January 25, 2017 |
| 5 electronic copies | David Boyle | January 24, 2017 |

TMAC also contacted the GN shortly after conformity was granted, and at the GN's request, TMAC also forwarded the DEIS to individual GN employees and consultants not included on the NIRB Distribution List. As set out below, only one member of this group received the materials on January 30, 2017.

| Document description | Additional GN Representative | Date Delivered |
|-----------------------------|-------------------------------------|-----------------------|
| 1 electronic copy | Stephen Atkinson | January 25, 2017 |
| 1 electronic copy | Jacques Lacroix | January 25, 2017 |
| 1 electronic copy | Lisa Marie Leclerc | January 30, 2017 |

In our view, the 30 day timeline communicated by the NIRB on January 18, 2017 provides a reasonable period for all participants to complete their review and forward IRs, absent of extenuating circumstances. In this case such circumstances do not appear to be present.

Accordingly, TMAC requests that NIRB work with the GN to ensure that the NIRB Distribution List is kept up to date, and confirm NIRB's expectation that all parties develop appropriate internal distribution protocols to ensure that NIRB process expectations are met. Adherence to all timelines going forward will be required in order to permit TMAC sufficient time to respond to IRs and technical comments that are submitted to the NIRB and NWB in respect of this application, and to permit the NIRB and NWB sufficient time to complete its processes.

If you have any questions or require any further information, please do not hesitate to contact me directly at oliver.curran@tmacresources.com.

Sincerely,



Oliver Curran

Director, Environmental Affairs
TMAC Resources Inc.

Cc:

Kofi Boa-Antwi (NIRB)
Karén Kharatyan (NWB)
Amy Robinson (GN)
John Roberts (TMAC)