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February 16, 2017

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

**Re: Response to NIRB's request for clarification on level of NIRB-NWB Coordination for the Madrid-Boston (Phase 2) Project**

Dear Ms. Arko,

The Nunavut Impact Review Board (NIRB) has asked TMAC Resources Inc. (TMAC) for clarification on the level of coordination it is seeking between the NIRB and the Nunavut Water Board (NWB) (the Coordinated Process) in respect of the Madrid-Boston Project (Phase 2). We are pleased to provide the following additional comments for the NIRB and the NWB consideration.

- **The Coordinated Process should consider potential interaction between Doris and Madrid-Boston regulatory approvals.** If approved, Phase 2 would rely in part on the use of existing infrastructure at the Doris Site (Doris), which is permitted pursuant to Doris Project Certificate No. 003 as well as Type A Water Licence 2AM-DOH-1323 (the Doris Water Licence). It is expected that if Phase 2 is approved by NIRB, a new Project Certificate would be issued for Phase 2. The Coordinated Process should consider how potential consequential amendments to Doris Project Certificate No. 003, as well as the potential for consequential amendments to the Doris Water Licence could be administered simultaneously without requiring additional process steps after the issuance of a new Project Certificate and Water Licence. The NWB may ultimately determine that an amended Type A Water Licence be issued for Doris and Phase 2 as the preferred licensing option over a stand alone Phase 2 Type A Water Licence and an amended Doris Water Licence. TMAC wishes to avoid duplication of Terms and Conditions in Project Certificates and Water Licences, and would like to ensure that processes to issue and/or amend a Project Certificate and Water Licence address consequential amendments (if required) within the coordinated process.
- **Increased need for coordination once the FEIS and updated water licence application is filed.** The Phase 2 application is currently at the "DEIS Information Request" stage of the NIRB process. Consistent with the "Detailed Coordinated Process Framework" (April 2012), TMAC has already submitted a preliminary Phase 2 Type A Water Licence application to the NWB.

TMAC anticipates it will submit a revised Phase 2 Type A Water Licence Application (or Application to Amend the Doris Water Licence, as noted above) at the time the FEIS is filed. TMAC does not anticipate there will be need for significant NIRB/NWB coordination efforts before that time. However, TMAC suggests that all DEIS information requests and responses relevant to water licensing that are received by NIRB in the interim should be promptly forwarded to the NWB. TMAC believes that there will be benefit to scheduling a NWB Technical Meeting immediately following the NIRB DEIS Technical Meeting to permit a discussion on water licensing matters (including those described above) before TMAC submits its revised water licensing application.

- **Harmonization of NIRB/NWB comment periods.** TMAC requests that NIRB and NWB coordinate deadlines for party comments on the FEIS and Type A Water Licence Application. This will limit the potential for duplicative effort for all participants in the process.
- **Consecutive scheduling of in-person meetings.** TMAC requests that NIRB and NWB consider scheduling consecutive Technical Meetings where appropriate. This approach was used during the recent NIRB/NWB coordinated process in respect of the Doris Amendment and minimizes effort for parties and the public to attend meetings.
- **Coordination of public hearings.** At this time, our understanding is that a fully joint NIRB/NWB public hearing on Phase 2 will likely not be feasible. Accordingly, TMAC is of the view that it should be feasible for a NWB public hearing to take place within two to three months after a positive recommendation by the NIRB to the Minister. TMAC notes that this timing would be similar to the TMAC Amendment and Mary River Project coordinated schedule.

We hope these comments are helpful and would welcome further discussion as required. If you have any questions or require any further information, please do not hesitate to contact me directly at [oliver.curran@tmacresources.com](mailto:oliver.curran@tmacresources.com).

Sincerely,



Oliver Curran

Director, Environmental Affairs TMAC  
Resources Inc.

Cc:

Kofi Boa-Antwi (NIRB)  
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Karén Kharatyan (NWB)  
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