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November 12, 2015

Tara Arko, Technical Director
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Dear Ms. Arko, Mr. Hohnstein;

Re: Revisions to TMAC Resources Inc. Amendment Application No. 1 of Project Certificate 003 and Water Licence 2AM-DOH1323 – Updated Management Plans

Further to our conversation on October 21, 2015 with Ms. Arko, and a subsequent conversation on November 2, 2016 with Ms. Gillard, TMAC wishes to outline our approach to management planning in relation to the *Revisions to TMAC Resources Inc. Amendment Application No. 1 of Project Certificate 003 and Water Licence 2AM-DOH1323* (Amendment Application) submitted earlier this year.

At the current stage of project development, construction, project management plans are in varying stages of development and applicability. There are:

1. Current management plans already in place.
2. Revised management plans submitted to the NWB and the NIRB for review.
3. New management plans to be submitted prior to commencing Operations.

These Plans are discussed below and presented in a summary table attached.

Current Management Plans

Current management plans are those that have been, and continue to be, required and used for ongoing and future operations of the Doris North mine site. Such plans include, but are not limited to: *Wildlife Mitigation and Monitoring Plan*; *Incinerator Management Plan*; *Monitoring and Follow-up Plan*; *Spill Contingency Plan*. The content of these plans has been, and continues to be, reviewed and periodically updated to reflect changes in ownership, site status, and facility or operational modifications or to address party and Inspector comments. Plan review typically occurs annually, with any updated Plans submitted to the respective Boards as a part of Annual Reporting or as revised. If, as a result of technical and public hearings, plan content needs to be revised prior to the start of Doris Operations, TMAC commits to providing any revision on or before September 15, 2016.

Revised Management Plans

Four plans have been revised to reflect the technical changes in scope associated with the Amendment Application. These Plans include: *Air Quality Management Plan*; *Interim Closure and Reclamation Plan*; *Water Management Plan*; *Waste Rock and Ore Management Plan*. These revised plans were submitted to the Boards with the Amendment Application in anticipation of a full technical review. Any required changes to the submitted revised plans arising from the technical and public meetings will be made subsequent to the regulatory processes, yet in advance of Doris Operations; TMAC commits to providing these management plans three (3) months prior to the start of Operations, on or before September 15, 2016.

New Management Plans

Some new management plans will be required prior to the start of Operations. These plans include: *Tailings Management Plan* (also referred to as the *Tailings Impoundment Area Operation, Maintenance and Surveillance Manual*); *Human Resources Plan*; *Landfill Management Plan*; and *Aquatic Monitoring Framework*. In accordance with the communication issued on July 24, 2015 and January 27, 2014, TMAC continues to commit to providing these management plans prior to the start of Operations.

In accordance with the terms and conditions of the existing water licence 2AM-DOH1323, TMAC commits to providing the *Tailings Management Plan/Tailings Impoundment Area Operation, Maintenance and Surveillance Manual* by June 1, 2016, which is six (6) months prior to the start of Operations.

TMAC commits to developing the *Aquatic Monitoring Framework* (the Framework), which will be inclusive of a scope typically addressed in an Aquatic Effects Management Plan (AEMP), yet will extend to the marine environment. Development of the Framework will follow the *Guidelines for Designing and Implementing Aquatic Effects Monitoring Programs for Development Projects in the NWT* (INAC 2009). This process calls for establishment of a multi-stakeholder Working Group to review working drafts of an AEMP. Accordingly, TMAC will initiate a Working Group and develop a draft Framework in Q1 2016. TMAC will then finalize the Framework, in consideration of party comments generated through the Amendment Application technical review, and submit the Framework by June 1, 2016, six (6) months prior to commencing Operations, as required under existing water licence 2AM-DOH1323.

The *Landfill Management Plan* will be submitted by September 15, 2016, six (6) months prior to the operation of the landfill, as required under 2AM-DOH1323.

The *Human Resources Plan* will be submitted by September 15, 2016, three (3) months prior to commencing Operations as communicated in TMAC letters dated July 24, 2015 and January 27, 2014.

Exceptions

TMAC acknowledges that Project Certificate 003 requires both an *Education and Orientation Plan* and an *Inuit Involvement Plan*. Given that TMAC has negotiated a new Inuit Impact and Benefit Agreement (IIBA) with the KIA, provisions under the IIBA fulfil some of the objectives typically set out in these Plans, particularly the *Inuit Involvement Plan*. Further, given the existing site orientation program already in place, as well as TMAC's commitment to developing a robust *Human Resources Plan*, TMAC feels that implementation of, and reporting under, the IIBA, the orientation program and the *Human Resources Plan* replace the need for an *Education and Orientation Plan*.

TMAC is committed to continuing an open and collaborative dialogue to facilitate a timely and thorough understanding and review of the Amendment Application and related documents. Should you have any questions regarding the management plans or the related attachment, please contact me at john.roberts@tmacresources.com.

Yours sincerely,



M. John Roberts
Vice President, Environmental Affairs
Hope Bay Project
(416) 628-0216

Encl.

cc. Sonia Aredes, Nunavut Water Board
Kelli Gillard, Nunavut Impact Review Board
John Roesch, Kitikmeot Inuit Association

Management Plans and Related Commitments
Application for Amendment to 2AM-DOH1323 and Project Certificate 003

General or Stated Licence or PC Requirement	Reference	TMAC Management Plan Title	Plan Description	Status	Target Submission Date	Commitments
Air Quality Management Plan (<i>Not specified as such, but captures the plans for several atmospheric monitoring programs and mitigation measures regarding air quality as noted in the Plan Description to meet requirements of Project Certificate .</i>)	PC 003 Item 4 Commitment 30, Appendix A Air Quality Commitments	Air Quality Management Plan	This Plan outlines the Doris North mitigation and monitoring programs for meteorology, passive air quality, construction dust, dust from subaerially deposited tailings in the TIA, particulate matter, evaporation and incinerator stack emissions.	Current approved plan in place. Submitted in June 2015 as part of 2AM-DOH1323 Amendment. May need to incorporate reviewer comments.	September 15, 2016	The Plan identifies emission sources and includes commitments to monitor and evaluate emissions through implementation of the following monitoring programs: passive monitoring; particulate monitoring including PM10, PM2.5 and TSP; dustfall monitoring including ambient, construction, snow core and tailings facility; incinerator stack testing; meteorological monitoring.
Aquatic Effects Monitoring Plan (<i>also part of Post-Environmental Assessment Monitoring Program (PEAMP) commitment in Project Certificate .</i>)	2AM-DOH1323 Part K Item 7	Aquatic Monitoring Framework	This Plan has been developed in consultation with Environment Canada to ensure it meets the requirements of the Environmental Effects Monitoring Program under the Metal Mining Effluent Regulations.	Current approved plan in place.	June 1, 2016	TMAC commits to developing an Aquatic Monitoring Framework, which will be inclusive of a scope typically addressed in an AEMP, yet will extend to the marine environment. Development of the Framework will follow the Guidelines for Designing and Implementing Aquatic Effects Monitoring Programs for Development Projects in the NWT (INAC 2009). This process calls for establishment of a multi-stakeholder Working Group to review working drafts of an AEMP. Accordingly, TMAC will commence the process of Framework development following the technical review of the Application in order to adequately consider Party comments and any additional considerations that may arise through the technical review process. TMAC anticipates initiating the Working Group and developing of a first draft Study Design in Q1 2016, with a final Framework in place prior to entering operations in January 2017. The AEMP will include: discussion of the receiving environment; incorporation of Inuit Qaujimatuqangjit; problem formulation including identification of stressors, exposure pathways, impact hypothesis, and assessment and measurement endpoints; study design including sampling site locations and parameters; monitoring response framework; reporting.
Closure and Reclamation Plan	2AM-DOH1323 Part L Item 5 PC 003 Item 4 Commitment 31	Interim Closure and Reclamation Plan	This Plan describes the closure procedures and cost of the Doris North Project once fully constructed and operational.	Current approved plan in place. Submitted in June 2015 as part of 2AM-DOH1323 Amendment. May need to incorporate reviewer comments.	September 15, 2016	The Plan describes mine facilities; provides closure objectives and options; describes closure and reclamation strategies; details closure activities for each area of the site; identifies uncertainties; discusses progressive reclamation; outlines post-closure monitoring and maintenance; outlines contingencies; provides a cost estimate; provides a schedule.
Community Relations Plan	PC 003 Item 4 Commitment 32, Final Hearing Report Appendix B Additional Commitments 42 & 57	Community Relations Plan	The Community Relations Management Program is designed to guide all interactions with Nunavut stakeholders and address the following: social baseline studies; social impact assessment; stakeholder mapping; stakeholder engagement; expectation and commitment management; complaints and grievance management; monitoring and evaluation.	Current Plan in place. Will be updated as/where needed.	September 15, 2016	-
Education and Orientation Plan	PC 003 Item 4 Commitment 32, Final Hearing Report Appendix B Additional Commitments 44	Scope addressed under IIBA and Human Resources Plan	An Education and Orientation Plan typically focuses on preparing potential employees and their families for employment at a specific site, supports major recruitment initiative, ensures that all workers are given full training including safety and cross-cultural training, supports worker understanding of policies and procedures, and provides for support to adjust to camp life. Given that TMAC has negotiated a new IIBA with the KIA, provisions under the IIBA fulfil some of the objectives typically set out in an Education and Orientation Plan. Further, given the existing site Orientation program already in place, as well as TMAC's commitment to developing a robust Human Resources Plan, TMAC feels that implementation of, and reporting under, the IIBA, the Orientation program and the HR Plan replace the need for an Education and Orientation Plan.	-	-	-
(Emergency Response and) Spill Contingency Plan	2AM-DOH1323 Part I Item 1	Spill Contingency Plan	This Plan provides an explanation of the expected roles and responsibilities of personnel in the event of a spill. The spill response process and communication procedures are provided for all levels of personnel who may be involved in a spill response. A complete inventory of the bulk chemicals (including hydrocarbons) stored at site is included, along with photos of where the materials are stored.	Current approved plan in place. Will be updated as/where needed.	-	-
Emergency Response (and Spill Contingency Plan)	PC 003 Item 4 Commitment 32	Emergency Response Plan	This Plan provides an explanation of the expected roles and responsibilities of personnel in the event of an emergency. The emergency response process and communication procedures are provided for all levels of personnel who may be involved in an emergency response.	Current Plan in place. Will be updated as/where needed.	-	-

Management Plans and Related Commitments
Application for Amendment to 2AM-DOH1323 and Project Certificate 003

General or Stated Licence or PC Requirement	Reference	TMAC Management Plan Title	Plan Description	Status	Target Submission Date	Commitments
Environmental Health and Safety Management System (Environmental Protection Plan)	PC 003 Item 4 Commitment 32	EHSMS (Environmental Protection Plan and Auditing and Continuous Improvement Plan)	From the Preamble to the EHSMS: "HBML considers the Environmental Protection Plan to be the complete set of management plans and operating procedures that have been put together to manage the environmental aspects of the project. In essence, the Environmental Health and Safety Management System and the Environmental Protection Plan refer to the same collection of documents ". Encompasses all of Hope Bay, including all Authorizations, etc.	Will be provided 3 months prior to commencement of Doris Operations.	September 15, 2016	-
Hazardous Waste Management Plan	2AM-DOH1323 Part G Item 10	Hazardous Waste Management Plan	This Plan describes the process used for handling, packaging, and shipping hazardous wastes for the entire Hope Bay Project. The Plan includes a brief description of the waste oil characterization program.	Current approved Plan in place. Will be updated as/where needed.	September 15, 2016	-
Hope Bay Project Quarry A, B & D Management and Monitoring Plan	2AM-DOH1323 Part D Items 9 & 20	Quarry Management Plan	This Plan describes the rock geochemical characterization procedure as well as the seepage monitoring program required for the rock removed from the quarry for use in construction activities. In particular, this Plan applies to the 3 quarries that were developed for construction of the Doris-Windy all-weather road, however, the Plan also applies to the programs that are completed annually for the rock quarried from all quarries on the Hope Bay Belt (Quarry 2, and Quarry 3 when opened), and rock removed from the 2 Roberts Bay tank farm locations and used for construction.	Current Plan in place. Will be updated as/where needed.	-	-
Human Resources Plan/Wellness Strategy	PC 003 Item 4 Commitment 32, Final Hearing Report Appendix B Additional Commitment 39	Human Resources Plan/Wellness Strategy	This Plan will provide a framework for addressing personnel needs throughout the project life including closure and post closure. The Plan intends to ensure that the appropriate human resources (HR) are acquired with the necessary skills, that people are trained appropriately and any gaps in skills are identified, that HR strategies are clearly defined and that HR activities are effectively managed.	Will be provided 3 months prior to start of Doris Operations.	September 15, 2016	TMAC commits to developing an HR Plan that outlines HR-related policies, reflects industry best practices and provides general practices where appropriate. The Plan will include the following: organizational planning; recruitment, hiring and retention practices; employee orientation; quality of life at site; wellness; talent management programs including career planning, skills development and training. The Plan will incorporate IIBA terms and conditions.
Incineration Management Plan	2AM-DOH1323 Part G Item 7	Incinerator Management Plan	This plan describes the operation of the Doris North incinerator. The Plan discusses the materials that can and cannot be incinerated, the waste sorting procedure at Hope Bay, as well as ash characterization and disposal. The Plan describes stack testing requirements, and how incineration procedures at Hope Bay meet the CWS for emissions of dioxins, furans and mercury.	Current approved plan in place. Will be updated as/where needed.	March 30, 2016	-
Inuit Involvement Plan	PC 003 Item 4 Commitment 32	Scope addressed under IIBA and Human Resources Plan	Generally, the intent of an Inuit Involvement Plan is to outline methods and practices to facilitate and enhance engagement between TMAC, Beneficiaries under the NLCA and their communities within the Kitikmeot Region including business opportunities and procurement, employment preferences, recruitment strategies, points of hire, consideration of traditional pursuits and regional economic development. Given that TMAC has negotiated a new IIBA with the KIA, provisions under the IIBA fulfil the objectives typically set out in an Inuit Involvement Plan. Accordingly, TMAC feels that implementation of, and reporting under, the IIBA replace the need for an Inuit Involvement Plan.	-	-	-
Landfarm Management and Monitoring Plan	2AM-DOH1323 Part G Item 13	Landfarm Management Plan	This Plan describes the Doris North landfarm design and the intended use of the three cells in the facility.	Plan was submitted to the NWB in 2014.	-	-
Landfill Management Plan	2AM-DOH1323 Part G Item 8	Landfill and Non-Hazardous Waste Management Plan	The water licence requires a Landfill Management Plan. To date, no non-hazardous waste landfill has been constructed so a Non-Hazardous Waste Management Plan has been implemented to deal with management of this waste stream, describing procedures currently in place for sorting, packaging, and off-site, or on-site disposal of non-hazardous wastes as appropriate, as well as managing waste and wildlife attractants, and ensuring health and safety of employees. This Plan will be replaced by a Landfill Management Plan once the landfill commissioning is planned.	Will be provided 6 months prior to use of the Landfill.	September 15, 2016	TMAC commits to developing a Plan meets industry standard requirements, and addresses party comments that arise during the technical review. The Plan will include: waste management including recycling, segregation, handling and disposal; waste auditing; waste consolidation; landfill design; landfill operation including waste placement, cover and grading; landfill management including waste inspection and acceptance; operational and maintenance records; training; reporting; closure.
Monitoring and Follow-up Plan	PC 003 Item 4 Commitment 32	Monitoring and Follow-up Plan	This Plan provides a summary of the monitoring and operating procedures that are included in each of the individual management plans, as well as the commitments and requirements for all of the Hope Bay Project licences, certificates, leases, and authorizations.	Current approved plan in place. Will be updated as needed to incorporate 2AM-DOH1323 Amendment (when approved) and NIRB Cert. Amendment.	September 15, 2016	-
Noise Abatement Plan	PC 003 Item 4 Commitment 29	Noise Abatement Plan	This Plan outlines the Doris North monitoring program for environmental and occupational noise. Mitigation measures to reduce noise are discussed.	Current approved plan in place. Will be updated as/where needed.	-	-

Management Plans and Related Commitments
Application for Amendment to 2AM-DOH1323 and Project Certificate 003

General or Stated Licence or PC Requirement	Reference	TMAC Management Plan Title	Plan Description	Status	Target Submission Date	Commitments
Occupational Health and Safety Plan	PC 003 Item 4 Commitment 32	Occupational Health and Safety Plan	This Plan describes the systems in place to ensure a safe and healthy work environment including: personnel; orientation and training; communication; risk assessment; management solutions and controls; safety management procedures; occupational health; emergency response; incident investigation and reporting; record keeping; inspections.	Current Plan in place. Will provide revised Plan three months prior to start of Doris Operations.	September 15, 2016	-
Quality Assurance and Quality Control Plan / Water Quality Data Analysis and Management Plan	2AM-DOH1323 Part K Items 1 & 2	QA/QC Plan	This Plan describes the water sampling locations specified under the three water licences, as well as the potable water sampling program stations. The Plan explains the sampling procedures for water (streams, lakes, pipelines), soil, ash and waste oil. The types of QA/QC samples that will be used on the project are explained. The sample labeling, packaging and shipping procedure is included, as well as the process for completing the laboratory chain of custody forms.	Current approved plan in place. Will be updated as/where needed.	-	-
Tailings Management Plan	2AM-DOH1323 Part G Item 25	Tailings Impoundment Area Operation, Maintenance and Surveillance Manual	This Plan will be developed in accordance with the Mining Association of Canada's guidance document: <i>Developing an Operation, Maintenance and Surveillance Manual for Tailings and Water Management Facilities</i> (2011).	Will be provided 6 months prior to Doris Operations.	June 1, 2016	TMAC commits to developing a Manual that meets industry standard requirements, and addresses party comments that arise during the technical review. The Manual will include: identification of roles and responsibilities; facility description including design basis, regulatory requirements and construction history; operational measures including tailings transport and deposition, dam raising, water management, safety and security; maintenance measures including routine, predictive and event driven maintenance; surveillance procedures; emergency planning and response; document control and reporting.
Waste Rock and Ore Management Plan	2AM-DOH1323 Part G Item 14	Waste Rock and Ore Management Plan	This Plan describes the Doris North waste rock characterization methods, the ore and waste rock placement on the pads, the seepage collection ponds, and the criteria that must be used to assess rock and runoff quality prior to acceptance as material for surface construction.	Current approved plan in place. Submitted in June 2015 as part of 2AM-DOH1323 Amendment. May need to incorporate reviewer comments.	September 15, 2016	In the Plan, TMAC commits to managing issues related to waste rock and ore storage including: metal leaching and acid rock drainage; nutrient release; brine water; fuel and lubricants; dust; geotechnical stability. The Plan also presents annual inspections, documentation and reporting.
Waste Water Treatment Management Plan	2AM-DOH1323 Part G Item 4	Liquid Waste Management Plan	This Plan describes the operation of the Doris North waste water (sewage) treatment plant, disposal of pressed sludge, and discharge of treated effluent.	Current approved plan in place. Will be updated as/where needed.	March 30, 2016	-
Water Management Plan	2AM-DOH1323 Part F Item 1	Water Management Plan	This Plan describes water management procedures and systems in place for the Doris North Project, including various ponds, sumps, and pipelines involved in collecting and conveying water. The Plan also describes the dewatering program for the TIA and briefly describes the water quality monitoring program required for the collection ponds and sumps and the TIA dewatering stations specified in the water licence.	Current approved plan in place. Submitted in June 2015 as part of 2AM-DOH1323 Amendment. May need to incorporate reviewer comments.	September 15, 2016	In the Plan, TMAC commits to managing issues related to water including: water management infrastructure design and extent including capacity; contact water; talik water; effluent discharge. The Plan also presents inspections, evaluation and contingencies.
Wildlife Mitigation and Monitoring Plan	PC 003 Item 4 Commitments 27 & 32	Wildlife Mitigation and Monitoring Plan	This Plan outlines the Doris North monitoring program for the wildlife valued ecosystem components (VECs) that were identified in the environmental assessment process. Detailed mitigation procedures have been developed as standard operating procedures for site level use. The Plan also outlines the baseline monitoring program that has been developed for the same VECs for use in future expansion projects. The 2011 Plan was updated in 2013 to include C & M.	Current approved plan in place.	April 30, 2016	This Plan will be updated to address outcomes of stakeholder roundtable meeting planned for late 2015, as well as party comments arising from the technical meetings.