

NIRB File No. 05MN047

December 7, 2012

Chris Hanks Hope Bay Mining Limited 300-889 Harbourside Drive North Vancouver, BC V7P 3S1

Sent via email: Chris.Hanks@Newmont.com

Re: The NIRB's 2011-2012 Monitoring Report for the Doris North Gold Mine Project and Board Recommendations

Dear Mr. Hanks:

Pursuant to the Nunavut Land Claims Agreement, Sections 12.7.1 and 12.7.2, in order to fulfill its monitoring mandate and achieve the objectives as specified in the Doris North Gold Mine Project Certificate (PC), the Nunavut Impact Review Board (NIRB) releases its 2011-2012 Doris North Gold Mine Project Monitoring Report (enclosed).

Following the recommendations issued by the Board on November 24, 2011 Hope Bay Mining Ltd. (HBML) has continued to make considerable efforts to meet the requirements of the NIRB PC (No. 003) throughout the 2011-2012 monitoring period and has addressed outstanding issues identified in the NIRB's 2010-2011 Annual Monitoring Report. While progress has been made toward compliance with the NIRB's PC (No. 003), certain conditions require HBML's attention.

Based upon its review of the monitoring report, the Board has issued the following recommendations in order to assist the Proponent in achieving compliance with the Doris North Project Certificate [No. 003] and other project-related commitments. The Board requests that HBML provide a response to the NIRB within 60 days of receipt of the following recommendations, or where, additional time may be required, that it work with the Monitoring Officer to set out an alternate timeline for response to recommendations as may be required.

Recommendations

Caribou Management MOU

In follow up to previous years' work, the Board is aware that the Government of Nunavut and HBML's progress toward the creation of a memorandum of understanding regarding caribou management has not been finalized.

Recommendation 1: The Board requests that HBML provide it with an update as to the status of caribou management initiatives, including any memorandum of understanding, collaring program, or other steps it has taken in conjunction with the Government of Nunavut to address caribou management.

Roberts Bay Jetty Area

The Board notes that a section of geo-mat® has protruded from the water near the Roberts Bay Jetty and is concerned that this may create a risk for wildlife entrapment, presents a marine navigation hazard and poses a safety concern for snowmobiles travelling in the area. The Board further notes that these impacts have not been given full consideration within HBML's current suite of environmental mitigation and monitoring plans.

Recommendation 2: The Board requests that HBML assess the potential impacts posed by geomat® mesh materials protruding from marine waters at the Roberts Bay area, and further, that the mitigation of any identified potential impacts be reflected in updates to the Wildlife Mitigation Monitoring Plan, the Aquatic Effects Monitoring Plan, Roberts Bay Jetty Monitoring Plan, and, the Health, Safety, and Loss Prevention Plan and any associated and/or annual reporting.

Closure and Reclamation and Environment, Health and Safety Management System

During the 2012 site visit, the Board's Monitoring Officer observed areas where the tundra had been rutted near the Doris North camp. HBML staff indicated that these tracks were from the movement of equipment called a "rimple rolygon" and some test trials that had been conducted during HBML's research of the impacts from overland travel.

Pursuant to Conditions 31 and 32 of the NIRB Project Certificate and the plans required therein, the on-land trials using rimple rolygon equipment should be monitored for potential impacts to the land and other components of the surrounding environment.

Recommendation 3: The Board requests that HBML monitor the impacts of rimple rolygon trials conducted overland and report the results of these trials, including impacts and proposed mitigation measures, in its future Annual Reporting to the NIRB.

Sewage Effluent

The Board notes that HBML relocated its sewage outfall at Doris North to an outcrop which serves as a natural diffuser and helps to mitigate erosion caused by direct discharge of sewage effluent.

Recommendation 4: The Board requests that HBML provide the Monitoring Officer with its plan to monitor the relocated sewage outfall in terms of potential impacts of erosion, as well as any part of site operations which involve the discharge of sewage effluent during winter months.

Tail Lake Discharge

HBML indicated that in 2012 it pumped site run-off and drainage from the ore and waste rock storage to Tail Lake and that it also pumped water from Tail Lake to Doris Creek. The water pumped into Doris Creek was sampled prior to discharge, with sample results provided to an AANDC Inspector 10 days prior to the actual release.

Recommendation 5: The Board recommends that HBML continue monitoring all discharge events from Tail Lake into Doris Creek during care and maintenance pursuant to Condition 10, and that the results of the associated sampling be included within the Proponent's 2012 Annual Report.

The Board respectfully requests that the Proponent provide a response within 60 days of receiving these recommendations or where additional time is required, to consult with the Monitoring Officer in developing an alternate timeline for response.

If you have any questions or require further clarification related to the NIRB's monitoring of the Doris North Gold Mine Project, please do not hesitate to contact me directly at (867) 983-4606 or gsorensen@nirb.ca.

Sincerely,

Glenn Sorensen Technical Advisor

Monitoring Officer for the Doris North Gold Mine Project

Nunavut Impact Review Board

cc: Lea-Marie Bowes-Lyon, HBML (Lea-Marie.Bowes-Lyon@Newmont.com)

Doris North Project Distribution list

Enclosed: The NIRB's 2011-2012 Doris North Gold Mine Project Monitoring Report



NUNAYUT IMPACT REVIEW BOARD 2011-2012 MONITORING REPORT



FOR THE

DORIS NORTH GOLD MINE PROJECT (NIRB FILE NO. 05MN047)

Report Title: The Nunavut Impact Review Board's 2011 – 2012 Annual Monitoring

Report for the Doris North Gold Mine Project (NIRB File No. 05MN047)

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Project: Doris North Gold Mine Project

Project Location: Kitikmeot Region, Nunavut

Project Owner: Hope Bay Mining Limited

300-889 Harbourside Drive North Vancouver, BC V7P 3S1

Tel: (604) 985-2572 Fax: (604) 980 0731

Monitoring Officer: Glenn Sorensen

Monitoring Period: May 2011 – June 2012

Date Issued: November 20, 2012

Cover Photo: Doris North Mine site (HBML)

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1. Introduction

1.1. Project Components

In September 2006, the Nunavut Impact Review Board (NIRB or Board) issued Project Certificate # 003 (PC) to Miramar Hope Bay Ltd. (Miramar) for the Doris North Gold Mine Project (Doris North project or the Project). The PC was issued following completion of the NIRB's Part 5 Review of the Project in accordance with Article 12 of the Nunavut Land Claims Agreement (NLCA). The Doris North project is located 125 kilometres (km) south of Cambridge Bay, in the West Kitikmeot region of Nunavut. The site is accessed by sealift for fuel and supplies, and by air for some freight and personnel.

The major components of the Doris North project include a campsite, underground mine and associated crusher and mill plant, a jetty, fuel tank farm and laydown area at the Roberts Bay area with a 5 km all-weather road linking Roberts Bay to the Doris mine site. An airstrip was built along the northern portion of the all-weather road. The tailings generated during the milling process were to be deposited in a Tailings Impoundment Area (TIA) at Tail Lake, approximately 5 km southeast of the mine site.

The original project proposal approximated a physical footprint of 62 hectares, with an ore processing capacity of 668 tonnes per day. The anticipated life of mine was 24 months, processing 458,000 tonnes of ore yielding approximately 306,830 ounces of gold.

1.2. Project History and Current Status

In early 2008, Newmont Mining Corporation (Newmont) successfully purchased all interests of Miramar and its subsidiary properties in the Hope Bay Belt, including the Doris North holding. Following this acquisition, Hope Bay Mining Ltd. (HBML) was established for the purposes of operating the Doris North Project and other properties in the Hope Bay Belt.

From early 2008 to late 2009, the construction of the Doris North Project was suspended as HBML re-evaluated the original mine development plan. In November 2009, HBML decided to proceed with the Doris North Project through a staged development strategy. The Doris North Project subsequently saw resumed infrastructure construction in the summer of 2010, and mine operation had been anticipated to commence in 2012.

In 2011, activity at Doris North was focused on completing infrastructure necessary for the advanced exploration stage of the project. These staged construction activities included infrastructure required for mining and milling operations in accordance with the overall development plan.

On January 31, 2012 Newmont announced that it had decided to move the Doris North Project into care and maintenance. Prior to this decision, a number of facilities and structures had been constructed to support the proposed mine, including the Roberts Bay area, Doris North Camp, and Tail Lake facilities which are linked by an all-weather road. Other facilities that were constructed along the roads include an Airstrip, land-farm, wash-out area and laydown pads.

1.2.1. The Roberts Bay Area

The Roberts Bay area includes the marine port and other associated facilities required by the project. A rock fill jetty was constructed for barge operations, and two bulk fuel storage facilities are located at Roberts Bay, one containing a single 5 million liter tank (empty as of September 2012), and a second one housing three 5 million liter tanks. A mechanical shop, vehicle repair complex, waste management facility, laydown and vehicle parking areas are also located at the Roberts Bay project area. A sandy beach area located approximately 1.5 km west of the jetty was used for explosives off-loading and storage. All structures and facilities were built on bedrock or rock fill pads.

1.2.2. Doris Camp

The Doris Camp is located approximately 5 km south of Roberts Bay. Facilities located near the camp include the land farm and burn pan area, the overburden dump, the core box storage area, reagent storage pads, the temporary explosives mixing facility and wash bay, and the all-weather airstrip. All facilities are constructed on rock pads and consist of:

- 180 man camp,
- mine offices,
- power generators,
- bulk fuel storage area,
- warehouses.
- underground mining support facilities,
- vehicle parking,
- material laydown, and
- a helicopter operations area.

All buildings and structures are located on rock pads to protect permafrost. The rock pads were constructed to ensure positive drainage and prevent permanent ponding of water. The milling and processing plant had not been constructed prior to the care and maintenance decision.

An underground decline and portal were constructed and are located at the east end of the camp. A vent raise was also constructed to supply heating and ventilation for the underground workings. All waste rock and ore from the bulk sampling program has been stockpiled on rock pads east of the camp.

A diversion berm with an impermeable liner was constructed upstream of the camp to divert non-contact runoff from Doris Mountain. Runoff from the camp pads and underflow through the pads is collected and managed as described in the Interim Water Management Plan (SRK 2012). The rock fill used for the pads is non-acid generating and non-mineralized (SRK 2007) material from Quarries #2 and #4.

1.2.3. Tail Lake Area

The Tail Lake area is located approximately 1 km east of Doris Camp, and is accessible via the Secondary Road (Tail Lake Road). The North Dam, the frozen core plant, and the Tail Lake access road are located in this area. The North Dam is a rock

fill dam with a permanently frozen core constructed to contain the tailings storage at Tail Lake.

In 2012 Hope Bay pumped site run-off and drainage from the ore and waste rock storage to Tail Lake. Hope Bay also pumped water from Tail Lake to Doris Creek that was sampled prior to discharge. The sample results were provided to the AANDC Inspector 10 days prior to discharge for approval prior to pumping. No process tailings have been discharged to Tail Lake: Environment Canada is of the opinion that the MMER does not apply until tailings are deposited in the impoundment area.

2. **Project Changes and Monitoring Activities for 2011-2012**

2.1. Closure and Reclamation Plan

HBML has informed the NIRB that the seasonal closure of the Hope Bay project camps and Doris Camp occurred on Oct. 12, 2012. The NIRB is awaiting formal receipt of the Care and Maintenance plan.

The current plan which was submitted to the Nunavut Water Board describes activities to be undertaken for closure and reclamation of the Doris Camp and nearby areas. The stated closure objective was to establish stable chemical and physical conditions that protect the environment and human health. HBML has indicated that during the pending care and maintenance, the site would be monitored and maintained as would have been the case post-closure, in order to ensure these conditions are met.

This document presents the closure obligations and the plan for closing for all facilities, and demonstrates how the closure obligations will be met. This plan differs from the Closure Plan as submitted by Miramar in 2005 (AMEC 2005) and which previously served as supporting documentation for the Final Environmental Impact Statement (Miramar 2005).

The current plan focuses on the closure of the site as it currently exists. In the event the site is brought out of care and maintenance in the future, requirements under the plan would be suspended and the requirements which normally apply during construction and production would come back into effect.

The AMEC (AMEC 2005) plan described closure of the Doris North project in the situation that it would have operated to produce and mill ore from the Doris North deposit. The project never advanced to this stage and is only technically an advanced exploration program with a decline that ends at ore faces. The mill was not constructed and tailings were not produced. The underground bulk sampling program at Doris North produced waste rock and ore which are located on dedicated rock pads.

Some infrastructure could contribute to future regional mineral development and HBML indicated that it should remain after closure. The roads, fuel storage, airstrip, port/jetty and rock pads may be used in future by this or other regional projects, and the rock pads, roads and airstrip as established have altered the thermal properties under their footprint and future removal could result in permafrost degradation.

3. **Compliance Monitoring**

The Doris North Camp and adjacent facilities are regulated by the Water Licence No. 2AM-DOH0713 and subsequent amendments granted by the Nunavut Water Board, and by the Kitikmeot Inuit Association pursuant to its Land Lease Agreement with HBML.

On January 18, 2012 the Water Licence 2AM-DOH0713 was amended to include the use non-mineralized waste rock for surface construction purposes and allow excess non-mineralized waste rock to be reclaimed in place on the Temporary Waste Rock Pad. The undertakings mentioned above shall be carried out in accordance with an approved Waste Rock Management Plan

3.1. Water Licence Amendment No. 4 Submission

The Nunavut Water Board acknowledged receipt on September 7, 2012 of HBML's application for an Amendment (No. 4) and Renewal to its Type "A" Water Licence (No. 2AM-DOH0713) for the Doris North Project.

In addition to applying for a 10 year renewal of its Type A Water Licence for the Project (effective September 2013), HBML also requested an amendment to allow the following activities:

- apply for the renewal of the current Type A Water Licence for a ten year period commencing in September 2013;
- apply for minor amendments relating to site monitoring and reporting during the care and maintenance period which reflect the current state of site construction and expected level of site activity during care and maintenance. HBML suggests that the NWB insert a Part M, "Care and Maintenance" section which outlines these updated requirements; and
- make various administrative revisions to the Type A Water Licence to reflect the current state of construction and consolidating all previous approved amendments.

As part of its consideration of the amendment application, the NWB requested that NIRB confirm whether or not the proposed amendments to the Project constituted a significant change to the scope of the Project as previously reviewed by the NIRB, and, if so, how the proposed changes could affect the original impact predictions contained within the original Final Environmental Impact Statement (FEIS) for the Project. The Board must also give consideration to whether the current terms and conditions would continue to achieve their purpose should the proposed amendments be approved and executed.

In the application, HBML provides a description of the company's planned site activity during the care and maintenance that relates to the Water Licence, as well as technical rationale for the proposed changes to site monitoring and reporting during care and maintenance. The following plans have been updated as a result of the water licence amendment application:

Hazardous Waste Management Plan, Rev. 1.1 – March 21, 2012;

- Incinerator Management Plan, Rev. 1.1 March 21, 2012;
- Non-Hazardous Waste Management Plan, Rev. 1.1 March 21, 2012;
- Interim Water Management Plan February 8, 2012;
- QA/QC Plan, Rev. 7.0 July 1, 201; and
- Doris North Closure Plan August 23, 2012.

3.2. Outstanding Issues from 2010-2011

3.2.1. Condition 30

MHBL will install and fund an atmospheric monitoring station. This station and its location shall be developed in consultation with EC and HC air quality officials and focus on particulates of concern generated at the mine site. The results of air-quality monitoring are to be reported every six (6) months to NIRB through the Monitoring Officer, and from there to all of the parties.

An air quality monitoring station was initially installed on the top of Doris Mountain cliff in September 2009, though both Environment Canada (EC) and the NIRB expressed concerns regarding the suitability of the chosen location. At the request of EC and with the support of the NIRB, HBML completed a re-evaluation of the air quality monitoring station, and the NIRB, Health Canada and EC recommended that the station be relocated to a more accessible location on the north shore of Doris Lake. During the NIRB's 2012 site visit it was confirmed that HBML has relocated the partisol sampler facility as directed, which allows for more frequent checks of the equipment.

3.2.2. Annual Stack Testing Report

HBML conducted an Emission Compliance Survey Monitoring Report from its analysis of testing conducted in July 2012.

Based on the Canadian Council of Ministers of the Environment's Canada Wide Standards for dioxins and furans and the "Guidelines for the Management of Biomedical Waste in the Northwest Territories", the test results showed that the emissions from the Doris Camp incinerator were in compliance for dioxins and furans.

3.3. Compliance with the NIRB Project Certificate

During the 2011-2012 reporting period, HBML has been successful in meeting compliance with the requirements of the NIRB Project Certificate [#003] and Appendix A to the certificate which contains a list of the Proponent's commitments. There are Terms and Conditions not applicable to the current projects' development stage.

3.3.1. Update to Health, Safety and Loss Prevention Plan

This plan is required by the NIRB's Monitoring Program as outlined in Appendix D of the Project Certificate and must satisfy the requirements for HBML's Occupational Health and Safety Management Plan and overall Emergency, Health and Safety Management Plan for the Project.

The purpose of updating HBML's Health Safety and Loss Prevention Plan is to detail relevant policies and systems which are to be adopted by the Proponent during care

and maintenance, and to provide the framework for their implementation. The updated Plan was received by the NIRB on September 27 2012.

4. Conditions Requiring Attention

4.1. Roberts Bay Jetty

The Jetty structure requires protection from wave and ice erosion, which is often provided in Arctic environments by the use of sandbags, concrete mats, or quarried rock. The technique observed instance is a design change from a bin wall structure to a geo-mat® laid on a fine sediment seabed. During the NIRB's 2012 site visit, it was noted that the mat appears to have been damaged, and that geo-mat® is protruding from the ocean at the Roberts Bay site.

The protruded geo-mat® has created a risk for wildlife entrapment and may present a marine navigation hazard and/or a safety concern for snowmobiles travelling in the area. These impacts have not been given full consideration within HBML's current Wildlife Mitigation and Monitoring Plan. Wildlife Mitigation and Monitoring Plan.

Condition 27

MHBL shall update and revise the Wildlife Mitigation and Monitoring Plan to reflect these terms and conditions and shall submit the revised Wildlife Mitigation and Monitoring Plan to NIRB. NIRB may consult with relevant Government departments and the Nunavut Wildlife Management Board prior to approving the revised Wildlife Mitigation and Monitoring Plan. The Wildlife Mitigation and Monitoring Plan must be submitted within three (3) months of the issuance of a Project Certificate and it must be approved by NIRB prior to the commencement of construction. MHBL must also submit an updated plan on an annual basis which must also be approved by NIRB.

HBML's 2011 WMMP Annual Report was submitted to the NIRB on January 19, 2012, and was distributed to Doris North Distribution List with a request that parties provide comments to the NIRB.

Based on its review of HBML's WMMP annual reports for 2007 and 2008, the Government of Nunavut, Department of Environment (GN-DoE) raised issues regarding the Proponent's use of aerial surveys in collecting caribou data, grizzly bear and wolverine hair snagging studies, and the need to estimate and mitigate for minerelated disturbances to raptors. Since receipt of the GN- DoE's comments, the NIRB has been encouraging direct discussions between the GN-DoE and HBML in order to reach a resolution. Both parties continue working on remedying the outstanding issues.

Disagreements still remain between the GN-DoE and HBML regarding a caribou collaring program as was initially indicated in 2010. Both parties have indicated that they plan to develop a Memorandum of Understanding (MOU) for HBML's contributions to DoE's caribou collaring programs.

Section 2.5 Wildlife Incidents of the WMMP Annual Report outlines a number of incidents resulting in animal and bird mortality. Adaptive management measures have been implemented to reduce these sources of mortality.

4.2. Socioeconomic Monitoring Committee and Monitoring Program

Condition 28

Within six (6) months of the issuance of a Project Certificate, a Hope Bay Belt Socio-Economic Monitoring Committee ("SEMC") shall be formed to supplement, not duplicate areas covered by the Inuit Impact Benefit Agreement negotiated for this project. In order to ensure consistent data collection and tracking of data trends in a comparable form to be shared at the regional level and to minimize the duplication of efforts, the composition of the SEMC should include the same membership as the Kitikmeot Socio-Economic Monitoring Committee approved by the Minister. Additionally, the SEMC must engage the affected communities of Cambridge Bay, Kugluktuk, Gjoa Haven, Taloyoak, and NIRB's Monitoring Officer, and consider concerns from Bathurst Inlet and Omingmaktok. In consultation with these parties and immediately upon the SEMC's formation, MHBL shall provide the terms of reference for a socio-economic monitoring program to the SEMC for review and subsequent direction by NIRB. The terms of reference are to include the role of MHBL in data collection and analysis; the key socio-economic indicators to be monitored; the reporting requirements; and the funding formula.

The Doris North SEMC was established in April 2007, with a Socio-Economic Monitoring Program (SEMP) and its associated Terms of Reference (ToR) developed and subsequently revised by Miramar at the end of 2007. The SEMP and ToR were approved by the Doris North SEMC in 2010. The next regular SEMC meeting has been announced for the week of November 27, 2012. HBML has expressed its intention to submit a copy of the 2011-2012 SEMC Report to the NIRB, and has indicated that it will work with the SEMC to determine the required next steps based on its planned reduction of site activities as the Project moves into care and maintenance.

4.2.1. Effluent Discharge and surrounding Area

A large laydown area located on the west side of the all-weather road close to the Doris North camp site had been in use as a staging area for various construction materials, equipment and sea cans. During the flyby over the site, the Monitoring Officer observed instances of scarification occurring on the tundra adjacent to the staging area. HBML staff indicated that these tracks were from the rimple rolygon trials conducted to research overland travel impacts. The rimple rolygon is used in Northern Alaska petroleum activities with success for overland travel; there is limited data on operationality within the Canadian Arctic to which HBML conducted their site specific research. The impacts of this type of overland activity should continue to be monitored.

HBML has employed an adaptive management approach by relocating the sewage outfall to an outcrop which acts a natural diffuser with a flow inhibitor installed at the outlet in order to mitigate erosion caused by direct discharge. HBML staff noted instances of glaciation occurring during freezing while discharge was occurring in cold periods. This may need to be monitored for long term effects, however during the site visit, no surficial impacts were observed.

4.2.2. Doris Creek Discharge

Email correspondence sent from HBML to the NIRB on November 15, 2012 indicated that in 2012, HBML pumped site run-off and drainage from the ore and waste rock storage to Tail Lake and that it also pumped water from Tail Lake to Doris Creek. The water to Doris Creek was sampled prior to discharge, with sample results provided to an AANDC Inspector 10 days prior to the actual discharge. HBML further confirmed that no process tailings have yet been discharged to Tail Lake.2012 Site Visit.

A complete site visit report has been compiled and is appended to this report in Appendix A.

5. Site Visit Summary

The NIRB's Monitoring Officer visited the Doris North site on September 21, 2012, with a surface site tour including the entrance to the Doris North decline (decline had been barricaded to entry), vent raises, service road, laydown area, three cell land farm, camp facilities, and the tailings impoundment area.

Observations made during the site visit indicate that all facilities which had been in operation and sites which will be placed into care and maintenance appear to have been operated within the approved plans and procedures as provided for through the NIRB Project Certificate [#003]. The Monitoring Officer noted that various environmental, health and safety measures appeared to be in place to support ongoing construction activities across the Project site.

As part of its efforts to maintain full compliance with regulatory requirements, HBML has been diligent in reporting major project changes to the NIRB and in obtaining the necessary approvals and licenses from authorizing agencies prior to the execution of project activities.

6. Comments Regarding HBML's Annual Report from Regulators

HBML has made a notable effort to meet the requirements stipulated in the NIRB Project Certificate [#003]. Where certain areas were identified as items of non-compliance in 2010-2011, the Proponent has largely addressed these outstanding issues in the current reporting period.

The NIRB has provided further information regarding those Terms and Conditions which require attention by HBML throughout this Report, including a discussion of recommendations provided by the Board under separate cover.

6.1. Environment Canada

A letter dated July 20, 2012 indicated that Environment Canada had no comments regarding HBML's 2011 Doris North Gold Mine Project Annual Report.

6.2. Aboriginal Affairs and Northern Development Canada

A Water Resource Officer from AANDC's Field Operations Division performed inspections of water licence compliance at the Doris North site on the March 16, 2011 and July 12, 2011 reporting a few minor issues.

The steps proposed to be taken by the Proponent to mitigate these issues were considered adequate. Thus, no outstanding issues of non-compliance with regards to HBML's water licence for the Doris North project were identified during inspections. AANDC indicated that its Water Resource Officers would monitor reoccurring issues involving burn pan operation and the maintenance and operation of containment berms at site. AANDC further noted that the planned transition of the Project from operations into care and maintenance would likely mitigate these issues.

6.3. Kitikmeot Inuit Association

No comments were received by the KIA regarding HBML's 2011 Doris North Gold Mine Project Annual Report.

7. Summary

HBML has been successful in moving the Project towards overall compliance with the requirements of the NIRB Project Certificate [#003] and is in compliance with the Terms and Conditions contained therein, except where such may not be applicable to the current stage of Project development. Certain issues do require the Proponent's attention as addressed in Section 3.4 and as provided for through the Board's recommendations included under separate cover.

As part of its efforts to maintain full compliance with regulatory requirements, HBML has been diligent in reporting major project changes to the NIRB and in obtaining the necessary approvals and licenses from authorizing agencies prior to the execution of project activities. The objectives of HBML's Care and Maintenance Plan include the establishment of stable chemical and physical conditions that protect the environment and human health. HBML indicated that it had suspended all activities at site, effective October 12, 2012 and that it planned to re-activate the site in April 2013 to prepare for seasonal water management and related environmental monitoring activities.

Monitoring and reporting programs during the undefined care and maintenance phase for the project will be critical in assisting the NIRB in early identification of potential impacts that may need to be mitigated. A dormant project may have unforeseen potential impacts that were not modeled during the Project's environmental assessment. HBML may encounter unique environmental challenges with this shift in project activities; the NIRB will continue to depend on HBML's established procedures in openly engaging communication with the Board.

The Monitoring Officer's post-site visit discussion with HBML staff focused upon wildlife mitigation measures being implemented in relation to an abandoned facility over the previous winter. All buildings had been skirted below ground level to lower denning risk and remote cameras were being deployed to monitor the site for both wildlife and human visitation. HBML indicated that it was seeking advice from the Government of Nunavut-Department of Environment as to the implementation of best practices or guidelines for deterring or preventing nesting and denning opportunities.

Baseline data collection may be impacted by seasonal operation of the site and support for new programs may become difficult. HBML has noted that it will continue with current projects, however noted that the mitigation and monitoring plans will be

amended in order to address and reflect the care and maintenance phase of the project moving forth.

The Government of Nunavut and HBML's process toward a memorandum of understanding relating to caribou has stalled; HBML stated that it is waiting for the GN to submit a proposal prior to moving forward. There appear to be capacity issues preventing this process from being completed.

Pursuant to NLCA Sections 12.7.2 and 12.7.3, the NIRB will continue to work with HBML and other agencies in order to provide the required evaluation of the monitoring efforts, results and compliance of this project-specific monitoring program in accordance with the requirements set out in the NIRB Project Certificate.



Appendix A: The NIRB's 2012 Doris North Site Visit Report



NUNAYUT IMPACT REVIEW BOARD 2012 SITE VISIT REPORT



FOR THE

DORIS NORTH GOLD MINE PROJECT

NOVEMBER 2012

Project: Doris North Gold Mine Project

Project Owner: Hope Bay Mining Limited

300-889 Harbourside Drive North Vancouver, BC V7P 3S1

Tel: (604) 985-2572 Fax: (604) 980 0731

Site location: Doris North Gold Mine Project,

Mainland of the West Kitikmeot region, Nunavut

Contact: Chris Hanks

Director of Environment and Social Responsibility,

Hope Bay Mining Limited

HBML Personnel: Alex Buchan, Manager of Community and External Relations

Katsky Venter, Environment Superintendent

Visit conducted by: Amanda Hanson, Director, Technical Services,

Nunavut Impact Review Board

Glenn Sorensen, Technical Advisor & Monitoring Officer,

Nunavut Impact Review Board

Henry Ohokannoak, Board member,

Nunavut Impact Review Board

Date of visit: September 21, 2012

Photos: Glenn Sorensen, Nunavut Impact Review Board

Cover Photo: Doris Outcrop

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1 Introduction

The Doris North Gold Mine project (the Project) is located in the west Kitikmeot region of Nunavut, approximately 125 kilometres (km) southwest of Cambridge Bay. On September 15, 2006 the Nunavut Impact Review Board (NIRB) issued Project Certificate #003 to Miramar Hope Bay Mining Ltd. (Miramar), pursuant to Section 12.5.12 of Article 12 of the Nunavut Land Claims Agreement (NLCA).

In 2008, Newmont Mining Corporation (Newmont) completed acquisition of the Doris North/Hope Bay Belt property, and established a new business entity titled Hope Bay Mining Ltd. (HBML) to operate the Project. Following a suspension of the construction activities in 2008 and 2009 while it revisited the Doris North development plan, HBML resumed infrastructure construction in 2010 and continuing into 2011. HBML continued with advanced exploration and construction at the Doris North project.

At the end of 2011, the project had progressed but still lacked the major facilities required for the Doris North mine to be in production, such as the mill and tailings impoundment area. HBML has maintained compliance as is required by the sections of the Project Certificate that apply to the infrastructure built to this date.

On January 31st, 2012 Newmont announced that the new corporate strategy was to put the Project into care and maintenance. This report is meant to provide an update of the NIRB's findings from the 2012 site visit, conducted as part of the NIRB's certificate monitoring program.

2 Objectives & Purpose of Site Visit

Pursuant to Sections 12.7.1 and 12.7.2 of the NLCA, the NIRB is responsible for the post environmental assessment monitoring of the Project in accordance with Project Certificate #003. The objectives of the NIRB's monitoring program as indicated in Section 12.7 of the NLCA include:

- a) determine whether, and to what extent, the land or resource use in question is being carried out within the predetermined terms and conditions pursuant to 12.7.2(b) of NLCA; and
- b) provide the information for agencies to enforce the terms and conditions of land or resource use approvals pursuant to 12.7.2 (c) of NLCA.

3 Inspection Items of the Site Visit

Prior to the site visit, the following documents were reviewed:

- NIRB Project Certificate No. 003 (September, 2006)
- NWB Water Licence No.: 2AM-DOH0713 (January, 2012)
- HBML Doris North Gold Mine Project 2011 Annual Report (June, 2012)
- NIRB's 2011 Annual Monitoring Report (File No. 05MN047, September, 2011)
- HBML Final Noise Abatement Plan (December, 2010)
- HBML 2010 Wildlife Monitoring and Mitigation Annual Report (January, 2011)
- HBML 2011 Q1-Q2 Air Quality Report (Q1 and Q2, 2011)
- Other correspondence relating to the Doris North project

Based upon a review of these documents, a listing of items to be considered during the 2012 site visit was prepared by the Monitoring Officer which included the following:

Sites, reporting and Activities proposed for review and discussion

- Second fuel tank containment facility at Roberts Bay
- North frozen core dam at Tail Lake
- Road from North Dam to South Dam
- Mine site sedimentation pond
 - Meteorological Station reports and functionality
 - Wildlife Monitoring Plan, reporting and mitigation of similar occurrences
 - Adaptive Management examples
 - o Environmental Protection Plan
 - o Emergency Response and Spill Contingency Plan
 - Progressive reclamation projects, examples
- Review spill reports & remediation techniques at site
- Government of Nunavut-Department of Environment Memorandum of Understanding on wildlife management and monitoring
 - Aerial flight monitoring reports
- Pollution control pond
- Sediment control pond
- Water Diversion Berm(s)
- Remediation of Frozen Core Plant Building
- Jetty Armour
- Power Plant footprint & fuelling station
 - Fuel Management Plan
 - o Berms & water management
 - Spill treatment facilities
- Metal Waste facility
- Tank Farm
- Aircraft Refuelling Station
- Facility road construction techniques and water interception strategies, drainage structures (culverts) and diversion ditches
- Aerial view of footprint, topography and watershed (NIRB to arrange as part of flight to or from site)

Site Visit Wrap-up Meeting

- Site visit observations and questions
- Update on operations for care and maintenance phase

4 2012 Site Visit Observations

The 2012 site visit was conducted by Glenn Sorensen, the NIRB's Technical Advisor and Amanda Hanson, the NIRB's Director of Technical Services on September 21st, 2012 with Board member Henry Ohokannoak in attendance. HBML personnel present during the site visit included Alex Buchan, Manager of Community and External Relations; and Katsky Venter, Environment Superintendant. The site visit consisted of a surface site tour and a fixed wing aerial flyby of the project site and general area. The surface site tour included the Roberts Bay area, the all weather road and airstrip, Quarry #2 area, Doris North camp site, frozen core dam site at Tail Lake and water intake facility on Doris Lake. The site visit was conducted both by vehicle and a walking tour around the Doris North camp site to view camp and mine infrastructure. At the conclusion of the surface tour, the NIRB staff met with HBML site staff to discuss the site visit and issues related to environmental compliance and reporting. The site visit was successful in viewing all the visible components of the project relating to the Proponent's decommissioning plans and operations, prior to the site proceeding into a care and maintenance phase.

5 Roberts Bay Area

The Roberts Bay area which serves as the Project's logistical hub is linked to the Doris North camp and mine site by a 4.8 km all weather road. During the site visit, the area was used to stage equipment and materials for removal in preparation for the care and maintenance phase of the Project. The major facilities at Roberts Bay included the Roberts Bay jetty, a 15 million litres (ML) fuel tank farm southeast of the jetty area, a laydown area, waste management facilities, incinerator and a 5 million litres empty fuel tank (with an insufficient berm) in the abandoned quarry. Fuel was being balanced between the Roberts Bay area and the Doris Camp site prior to seasonal abandonment and in preparation for the care and maintenance phase. Photo 1: Roberts Bay Area



Photo 1

5.1 Fuel Storage Tanks and Spill Response

During the site visit, three 5.7 ML diesel tanks at the Roberts Bay area were in operation (Photo 2). The construction of additional Diesel and Jet A tanks had not commenced prior to the announcement that the Project would be placed into care and maintenance.



Photo 2

The NIRB Monitoring Officer observed spill prevention measures in place including the storage of emergency response equipment in sea cans at Roberts Bay landing site and at other designated areas, readily available for emergency circumstances.

5.2 Waste Management Facilities

Roberts Bay waste management facilities are operated by HBML, and handle all combustible and non-combustible wastes from the project and HBML's ongoing exploration activities in the region.

Non-combustible wastes generated at the Doris North site are transported to the waste management area for backhaul shipment once logged, segregated, sorted, labeled, and repackaged if necessary (Photos 3 and 4).

During the site visit, hazardous wastes were observed to have been segregated and stored in designated containers both in the waste management building and at the outdoor storage area in accordance with HBML's Waste Management Plan. All hazardous waste materials are regularly shipped off-site to an approved waste disposal facilities in the Northwest Territories.

Combustible wastes (including food and sludge produced by the sewage treatment plants) generated at Doris camp are transferred to the Roberts Bay waste management facility and are incinerated on a daily basis.





Photo 3

Photo 4

An incinerator was established at the Roberts Bay waste management area in 2009 to manage food waste and other waste suitable for incineration. Stack emissions testing was conducted in late September and early October 2009, and testing results showed that the dioxin and furan emissions exceeded the limits required by

the Canadian Council of Ministers of the Environment's Canada Wide Standards (CWS) for Dioxins and Furans.

Additional stack emission tests were conducted on July 17, 18 and 19th 2012. The results from this testing showed that HBML is in compliance with the CWS for Mercury, and the CWS for Dioxins and Furans.

5.3 Roberts Bay Jetty Area

The Jetty structure requires protection from wave and ice erosion. Protection in an arctic environment may be provided by sandbags, concrete mats, or quarried rock. The technique used in this instance is a design change from a bin wall structure to a geo-mat[®] laid on a fine sediment seabed. The geo-mat[®] was observed to be protruding from the ocean (Photo 5). There were also several instances of exposed "mesh material" observed along both sides of the jetty on the seabed that have an elevated risk of failure.

The protruded mesh has created a risk for wildlife entrapment, a marine navigation hazard and a safety concern for snowmobiles travelling in the area. This impact should be assessed, mitigated and reflected in the Wildlife Mitigation Monitoring Plan; the Aquatic Effects Monitoring Plan; Roberts Bay Jetty Monitoring Plan; and, the Health Safety and Loss Prevention Plan.



Photo 5

5.4 All-Weather Road and Airstrip

The all-weather road and airstrip have been in operation since their construction was completed in 2008. As part of HBML's October 29, 2010 application to the Nunavut Water Board (NWB) for the "Water Licence Amendment No. 2", HBML proposed to construct a short service road bypassing the airstrip to eliminate traffic jams that resulted from the northern portion of the 4.8 kilometre (km) all-weather road functioning as both an airstrip and road. In the application, HBML also proposed to extend the airstrip to accommodate larger aircraft using quarry material excavated from the new fuel tank farm.

During the 2012 site visit, HBML staff indicated that the quarry material removed from the new fuel tank farm in 2011 had been used for airstrip expansion (Photo 6). The decision to place the Project in care and maintenance has resulted in HBML's cancellation of all construction projects. As a result of the airstrip expansion being postponed, per HBML's Health Safety and Loss Plan (HSLP), vehicles approaching the airstrip on the all-weather road must wait at either end of the airstrip during aircraft landing and take-off.



Photo 6

HBML continues to use EK-35 as a dust suppressant for the airstrip and roads during the snow and ice-free seasons. HBML indicated that use of this dust suppressant continues to mitigate dust concerns identified in the EA process (Photo 7 and 8).





Photo 7 Photo 8

5.5 Three Cell Land farm and Laydown Area

The Three Cell Land farm and Laydown Area are located north of the Doris North camps, on the west side of the all-weather road. The No. 2 quarry and the sewage discharge outfall are adjacent to this area (Photo 9).

Through utilization of their adaptive management plan potential erosion caused by direct discharge has been mitigated. Site staff reported incidents of glaciation occurring during freezing discharge periods that may have to be monitored for long



term erosion effects. During the site visit no surficial impacts were observed.

Photo 9

A three cell land farm to be used for the treatment of contaminated soil and snow has been constructed on the north side of Quarry #2 (Photo 10). This land farm is operational with a minimum amount of soil to be remediated due to the reduced



scope of current operations.

Photo 10

A large laydown area located on the west side of the all weather road close to the Doris North camp site has been used as a staging area for various construction materials, equipment and sea cans. During theb flyby over the site, the Monitoring Officer observed instances of scarification occurring on the tundra adjacent to the staging area.







Photo 12

HBML staff indicated that these tracks were from the rimple rolygon trials conducted to research overland travel impacts (Photo 11). The rimple rolygon is used in Northern Alaska petroleum activities with success for overland travel; however there is limited data on the operations of this equipment within the Canadian Arctic in the manner that HBML conducted its site specific research.

5.6 **Doris North Camp Site and Mine Site**

The Doris North camp and mine site are located approximately 5 km south of Roberts Bay at the north shore of Doris Lake and serve as the major components of the Project (Photo 13). In addition to the camp site which has been in full operation since 2008, the Doris North mine site hosts infrastructure which would be directly associated with future mine operation.



The following major facilities associated with the Doris North Project have been constructed and require monitoring, including during the care and maintenance phase: the Roberts Bay jetty; Roberts Bay fuel tank farms and laydown areas; waste management facility; reagent laydown areas; airstrip; quarry 2; Doris Camp; camp site fuel tank farm; helipad; Doris underground decline and portal; and North Dam (Tail Lake tailings impoundment area).

5.7 Mine Site Facilities

Accompanied by HBML site personnel, the NIRB staff conducted a walking tour of the mine facilities with a focus on environmental, health and safety management and performance as per Appendix D of the NIRB Project Certificate #003 (Photo 14 and 15).





Photo 14 Photo 15

Construction of the Doris North portal was completed in October 2011, and the ramp in the Doris North decline has been obstructed with backfill material and chain-link fencing complete with signage in English and Inuinnagtun.

HBML staff noted during the site visit that ore which was mined from the decline construction had been stockpiled on the west side of the Portal while waste rock from the decline was stockpiled southwest of the ore stockpile.

In order to collect and manage surface runoff from the ore and waste rock stockpile areas, HBML indicated that it had constructed a water control pond on the south side of waste rock pad. HBML personnel further noted that along the west side of the pollution control pond, a temporary sedimentation pond had been constructed at the location intended for the mill; designed to collect freshet and runoff from facility contact water. Site staff further noted that should the Tailings Impoundment Facility (TIF) at Tail Lake be put into operation, the temporary pond would be removed and the crusher and mill would be built on its place. Under the proposed care and maintenance plan, HBML indicated it would maintain this facility to manage contact water (Photo 16).



Photo 16

5.8 Camp Sewage Treatment Facility

HBML staff indicated that the site utilizes a reverse osmosis water treatment system and that the compressed effluent is further managed via incineration at the waste management facility. This system is typical of remote camp water treatment in the arctic. Facility staff indicated that discharge criteria meets the terms and conditions of the NWB water licence for the Doris North Mine site.

5.9 **Tail Lake Dam Area**

Tail Lake is located on the east side of Doris Lake and is the planned site for the Tailings Impoundment Area facility (TIA). The TIA was to be utilized during mine production, with a tailings transport pipeline planned for installation along the service road at the eastern shore of Tail Lake and which would connect the North Dam with the South Dam (Photos 17, 18 and 19).







Photo 17

Photo 1

Photo 19

A road connecting the Doris North Mine and the Tail Lake TIA was constructed on site. The fish-out program at Tail Lake was completed in fall 2011 and all supporting infrastructure has since been removed. Construction of the south dam and connecting road had not begun prior to the decision to move the Project into care and maintenance.

5.10 Wildlife Monitoring

Condition 25:

HBML shall file a monitoring plan focused on assessing and mitigating interaction between humans and wildlife at the mine site, including associated infrastructure such as the TIA (Tailings Impoundment Area), roads, and activity at the waterfall. A quarterly report must be sent to NIRB's Monitoring Officer on interactions that have occurred; any effect the interaction may have had on humans and wildlife, and mitigation measures taken to avoid similar interactions in the future.

HBML reported that it garnered considerable experience in dealing with bears from incidents in 2009. Food waste had been improperly stored at a camp which attracted and habituated Barren-Ground Grizzly Bears, however, HBML reported that its use of aggressive bear deterrent action avoided any destruction of habituated bears.

HBML personnel indicated during discussions with NIRB staff on site that it had reviewed its waste management and wildlife mitigation procedures and that it had

adopted the following procedures which were designed to help mitigate interaction with wildlife at site

- Segregation and incineration of food waste;
- Reinforcing wildlife awareness in orientation programs and developing wildlife incident reporting procedures; and
- Establishing and training a wildlife response team.

During the site visit a monitoring station for wildlife incidents was observed, this station included pictures of regional wildlife indicators of occurrence (tracks) for staff to report through a ballot box system. These reports were collected, recorded and reported to the response team. It was indicated that wildlife was an additional workplace hazard that was the employee's responsibility to report or address under the Wildlife Monitoring and Mitigation Plan (Photos 20 and 21).





Photo 20 Photo 21

HBML's wildlife management program has been recognized by the Government of Nunavut's Department of Environment as a model for other Nunavut mining operations to follow.

5.11 **Noise Abatement**

Condition 29:

MHBL shall develop and implement a noise abatement plan to protect people and wildlife from mine activity noise, including blasting, drilling, equipment, vehicles and aircraft. The noise abatement plan will be developed in consultation with GN-DoE, EC and HC, and includes: restrictions on blasting and drilling when migrating caribou, birds or local carnivores may be affected; the establishment of strict standards for noise levels; use of equipment and vehicles with the best noise attenuation devices; when practical, the use of fences or berms around noisy machinery or sites; flight corridor restrictions over sensitive areas with known concentrations of wildlife and birds whenever possible; and requiring with the exception of take-off and approach for landing, a minimum flight altitude of 300 metres above ground level when flights to and from the mine site are passing near sensitive wildlife and bird areas. The noise abatement plan will also incorporate the use of sound meters to monitor sound levels at sites in and around the mine site and local study area. The location and design of the sound meters shall be selected in consultation with EC and set up immediately upon

issuance of the Project Certificate for the purpose of obtaining baseline data, and during and after operations. The final noise abatement plan shall be filed with NIRB's Monitoring Officer within six (6) months of the issuance of the Project Certificate.

During the site visit, HBML was engaged in the surface detonation of project explosives as a means to dispose of pre-mixed explosives materials. This activity was not anticipated to continue over a long period of time but the Monitoring Officer found that the sound and dust produced from the detonation were significant when they did occur (Photo 22). No caribou or other wildlife were observed in the mine area during the explosives detonation and HBML's HSLP procedures were followed before each detonation, with staff communicating clearly via site radio.

This activity appears to have been in compliance with the mitigation measures outlined in HBML's Noise Abatement Plan as outlined below;

"Cessation of above ground blasting when groups of caribou are within 500 m of the blast area, as determined by ground-based observations. Caribou presence will be identified through daily, ground-based surveys during the peak periods when caribou are present in the Project area – currently early May and early November, when the Dolphin and Union herd is migrating to and from Victoria Island".



Photo 22

5.12 Air quality Monitoring

Condition 30 of the NIRB Project Certificate states:

MHBL will install and fund an atmospheric monitoring station. This station and its location shall be developed in consultation with EC and HC air quality officials and focus on particulates of concern generated at the mine site. The results of air-quality monitoring are to be reported every six (6) months to NIRB through the Monitoring Officer, and from there to all of the parties.

An air quality monitoring station was initially installed on the top of Doris Mountain cliff in September 2009, though both Environment Canada (EC) and the NIRB expressed concerns related to the suitability of the chosen location. At the request of EC and with the support of the NIRB, HBML completed a re-evaluation of the air quality monitoring station location. The NIRB, Health Canada and EC recommended that HBML move the station to a more accessible location on the north Shore of Doris Lake (Photo 24). During the 2012 site visit it was confirmed that HBML has relocated the air quality monitoring station as recommended, which, HBML staff noted, has allowed for more frequent checks of the equipment.



Photo 23

5.13 **Health and Safety Management**

Condition 32:

Prior to the commencement of operation MHBL shall have a complete Environment, Health and Safety Management System in place which includes the following: Wildlife Mitigation and Monitoring Plan; Environmental Protection Plan; Emergency Response and Spill Contingency Plan; Occupational Health and Safety Plan; Reclamation Plan; Education and Orientation Plan; Human Resources Plan; Inuit Involvement Plan; Community Relations Plan; Monitoring and Follow-up Plan; and Auditing and Continuous Improvement Plan. When complete, these Plans shall be forwarded to NIRB's Monitoring Officer.

Site observations made during the 2012 visit indicate that environmental protection measures implemented by HBML in conjunction with health, safety and loss prevention (HSLP) measures meet Condition 32 of the Project Certificate, given the current state of Project operations. HBML submitted an updated HSLP to the NIRB on October 5, 2012 which replaces the October 2010 HSLP and which reflects the Care and Maintenance status of the Doris North Project.

5.14 Care and Maintenance

HBML personnel indicated that approximately 200,000 tonnes of waste rock has been extracted and is currently located on the permitted waste rock pad though to date. The Doris North Project had not processed any ore or created any tailings, as it had never entered the production mining stage of operations. As the Doris North Project moves into care and maintenance, HBML's foremost objectives are safety and protection of the environment.

During the site visit, HBML indicated that it had been preparing site facilities for placement of the Doris North project into care and maintenance for October 2012 (Photo 25). Buildings and facilities were being secured and winterized during the Monitoring Officer's site visit, and HBML noted that it anticipated that all individuals would be vacated from Doris North by mid-October.



Photo 24

While HBML indicated it would suspend all activities on-site between October 2012 and April 2013, it noted that it plans to re-engage at the site come spring in order to prepare for active water management and related environmental monitoring activities, and that it would continue to manage water in compliance with all applicable water licensing over the summer months.

With respect to socioeconomic aspects of care and maintenance, HBML staff indicated that the Doris North workforce had steadily decreased since January 2012. HBML has taken steps to support its employees in finding meaningful employment and in transitioning away from the project. In particular, with respect to Inuit employees, we have been successful in assisting with their placement in other companies active in the North.

To manage potential environmental risks arising from long term storage of large volumes of fuel, HBML transferred 8 million litres of fuel offsite in accordance with Transport Canada requirements and without incident in August 2012. The remaining fuel at site (approximately 6 million litres) had been divided among the various tank farms at Doris North. HBML indicated that it took this action in minimizing the risk that fuel that would be spilled into the containment berms in the event of any tank damage. HBML also indicated that 70,000 litres of fuel would remain in the Boston tanks over the winter season.

HBML has been in contact with the Kitikmeot Hunters and Trappers Association to arrange for some of their members to monitor site facilities on a periodic basis between October - March. In addition to this, HBML plans to install cameras at site to provide security and wildlife monitoring during periods when site is not occupied.

The 15 km all weather road from Doris North to Windy camp as approved by KIA (as per the Land lease), connecting the Madrid/Patch, Boston District will have to be monitored through the care and maintenance phase through the applicable regulatory authority. The cumulative impacts of future works in the region may have to be assessed on future regional screenings. The exploration infrastructure and related water use activities has been captured under the requirements of the NWB Water Licence No. 2BE-HOP0712.

6 Summary

Construction of the planned infrastructure for the Doris North Project was near completion prior to the decision to move the Project into care and maintenance. Key project elements including the Doris North decline, vent raises, service road, laydown area, three cell land farm and the tailings intake facility had been completed.

Overall, the Project Certificate Terms and Conditions have been complied with, though minor issues that need to be managed have been identified through regulatory agency inspections; these have largely been addressed.

As part of its efforts to maintain full compliance with regulatory requirements, HBML has been diligent in reporting major project changes to the NIRB and in obtaining the necessary approvals and licenses from authorizing agencies prior to the execution of project activities.

The Monitoring Officer's post-site visit discussion focused on the implementation of wildlife mitigation measures and concerning an abandoned facility over the previous winter. All buildings had been skirted below ground level to lower denning risk and remote cameras were being deployed to monitor the site for both wildlife and human visitation. HBML was seeking advice from the Department of Environment for GN to implement best practices or guidelines for deterring or preventing nesting and denning opportunities.

Observations made during the site visit indicate that all facilities which had been in operation and sites that are being placed into stasis appear to have operated within the approved plans and procedures. Environmental, health and safety measures that appeared to be in place during ongoing construction activities across the project site will continue to support the project's move into care and maintenance.

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Title: Monitoring Officer Director, Technical Services

Date: November 19 2012 November 19, 2012

Signature: