



NIRB File No. 05MN047

June 26, 2013

Terry MacGibbon
TMAC Resources Inc.
40 King Street West Suite 2100
Toronto, ON M5H 3C2

Sent via email: tmacgibbon@tmacresources.com

Re: Term and Condition 30 - Response to HBML's (TMAC Resources Ltd.) Proposed Suspension of Incinerator Stack Testing at Doris North Gold Mine during Care and Maintenance

Dear Terry MacGibbon:

On September 15, 2006 the the Nunavut Impact Review Board (NIRB or Board) issued Project Certificate (No. 003) for the Doris North Gold Project (NIRB File No. 05MN047) in accordance with Section 12.5.12 of the Nunavut Land Claims Agreement (NLCA) which included terms and conditions relating to air quality; specifically, Term and Condition 30 which 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.

Commentary: NIRB expects the Canada Wide Standards for Dioxins and Furans and the Canada Wide Standards for Mercury will apply and should be followed including stack testing of incinerators."

On January 23, 2013 the NIRB received an email request from then-owner¹ of the Doris North Gold Project, Hope Bay Mining Ltd. (HBML), to consider allowing it to suspend stack testing of its site-based waste incineration and to reduce future stack testing frequency. HBML proposed this adjustment to Term and Condition 30 owing to the reduction in activities at the Doris North

¹ Note that the NIRB received confirmation on April 11, 2013 that TMAC Resources Inc. had acquired the Doris North Project from Hope Bay Mining Ltd. and on April 11, 2013 re-issued the NIRB Project Certificate No. 003 to TMAC Resources Ltd.

Gold Project during care and maintenance and the future predicted decrease in the waste being incinerated due to changes in waste stream management.

On March 6, 2013 the NIRB requested Environment Canada's (EC) advice regarding HBML's requests pertaining to stack testing at the Doris North Gold Project while it remains in care and maintenance and also future operational changes to waste stream management.

On April 15, 2013 the NIRB received EC's response which advised that sites incinerating 26 tonnes of waste per year or more must conduct annual stack testing to confirm compliance with emission standards as set out by the Canadian Council of Ministers of the Environment *Canada-wide Standards for Dioxins and Furans* and the *Canada Wide Standards for Mercury Emissions*. If operations incinerate less than 26 tonnes of waste per year, EC stated that the Proponent would not be expected to conduct annual stack testing; however, it would be required to make determined efforts to achieve these emission standards. EC also recommended that HBML heed the advice provided in its Technical Document for Batch Waste Incineration to guide the Doris North operations in achieving compliance with emissions.

Information pertaining to air quality at Doris North Gold Project, including the current request, the Proponent's Air Quality Management Plan, the advice provided by EC relating to the suspension of stack testing and other information regarding incineration can be obtained from the NIRB's online public registry at the following link:

<http://ftp.nirb.ca/03-MONITORING/05MN047-DORIS%20NORTH%20GOLD%20MINE/02-MONITORING%20AND%20MANAGEMENT%20PLANS/AIR%20QUALITY%20PLAN/>.

Following a review of the Proponent's request and the information provided by EC, the NIRB would support HBML's request to suspend annual stack testing during care and maintenance *provided* incineration rates can be demonstrated to be less than 26 tonnes per year by TMAC Resources Ltd. (TMAC), current owner of the project, and reported to the NIRB as set out within the NIRB's Project Certificate No. 003.

In respect to HBML's request to eliminate the requirement for future stack testing owing to a planned reduction in the waste stream management, TMAC would be required to provide the Board with evidence that it generated less than 26 tonnes of waste for incineration during the year in question (or projections for future years based on waste management streams), along with a detailed request to revisit the requirements for stack testing and the frequency of testing as per EC's advice.

The Board expects that TMAC will continue to keep the NIRB and other agencies informed as to the status of waste stream management and plans for stack testing. If at any future point in time the site waste volume changes or the Doris North Gold Project comes out of care and maintenance or any other information becomes available, the Board may re-visit this matter and may determine that stack testing resume as is required pursuant to Project Certificate No. 003.

If you have any questions or require clarification, feel free to contact me directly at (867) 983-4619 or kgillard@nirb.ca.

Sincerely,

A handwritten signature in blue ink that reads "Kelli Gillard". The signature is fluid and cursive, with the first name "Kelli" and last name "Gillard" clearly distinguishable.

Kelli Gillard B.Sc., P.Ag
Interim Monitoring Officer for the Doris North Gold Mine Project
Nunavut Impact Review Board

cc: Catharine Farrow, TMAC Resources Inc.
Gordon Morrison, TMAC Resources Inc.
Chris Hanks, Hope Bay Mining Ltd.
Lea-Marie Bowes-Lyon, Hope Bay Mining Ltd.
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