



**NIRB File No.: 05MN047**  
**NWB File No.: 2AM-DOH1323**

August 13, 2015

Thomas Kabloona, Chairperson  
Nunavut Water Board  
c/o Phyllis Beaulieu, Manager of Licensing  
Nunavut Water Board  
P.O. Box 119  
Gjoa Haven, NU X0B 1J0

*Sent via email: [phyllis.beaulieu@nwb-oen.ca](mailto:phyllis.beaulieu@nwb-oen.ca); [licensing@nwb-oen.ca](mailto:licensing@nwb-oen.ca)*

**Re: Application Exempt from the Requirement for Screening pursuant to Section 12.4.3 of the NLCA: TMAC Resources Inc.'s "Doris North Gold Mine" Waste Rock and Ore Management Plan Revision, Kitikmeot Region**

Dear Phyllis Beaulieu:

On June 18, 2015 the Nunavut Impact Review Board (NIRB) received a referral from the Nunavut Water Board (NWB) to screen a proposed Updated Waste Rock and Ore Management Plan (the Plan) associated with NWB Licence No. 2AM-DOH1323 for TMAC Resources Inc.'s (TMAC or the Proponent) "Doris North Gold Mine Project". The proposed revision refers to the construction, operation and decommissioning of a waste rock storage pad identified as Pad T.

Please be advised that the Doris North Gold Mine Project was previously reviewed by the NIRB pursuant to Part 5 of Article 12 of the Nunavut Land Claims Agreement (NLCA) and is currently being monitored by the Board through the provisions of NLCA Article 12, Part 7 and the Doris North Project Certificate No. 003, issued by the NIRB on September 15, 2006. An optional Pad T had been included in the impact assessment within the Final Environmental Impact Statement for the Doris North Gold Mine Project.

Previously on October 26, 2010 the NIRB received an amendment request for the Type A Water Licence No. 2AM-DOH0713 from the Nunavut Water Board for the Doris North Gold Mine Project. Following a complete examination of then Proponent, Hope Bay Mining Ltd.'s (HBML) amendment request, the NIRB understood that HBML was requesting an amendment to specific Terms and Conditions of its Type A Water Licence that would permit HBML to implement the Waste Rock and Ore Storage Management Plan (2010). The NIRB also noted that the amendment application was required by the NWB in order for the NWB to give its approval of the plan.

## PROCEDURAL HISTORY

After receiving the NWB referral on June 18, 2015 for the proposed Updated Waste Rock and Ore Management Plan, the NIRB conducted a preliminary examination of the proposed plan and associated correspondence. Within the cover letter requesting consideration of the Plan, TMAC noted that the materials had comprised part of its previous project certificate amendment application (also referred to as the 12.8.2 amendment package) submitted to both the NIRB and NWB on December 9, 2013 which had initiated a joint assessment process. Previously on April 30, 2014, the NIRB and the NWB had issued joint correspondence indicating that the technical assessment process would not proceed until a complete amendment package was received by both agencies, at minimum including: all proposed modifications to be considered as part of the amendment request, as well as the supporting information required to assess all the modifications.

On June 23, 2015 the NIRB received TMAC's revised 12.8.2 amendment application, including a request to have it replace the previous amendment package, which noted a revised scope of activities and operational plans, to recommence the NIRB's assessment related to the reconsideration of the terms and conditions in Project Certificate No. 003. As the December 2013 amendment application had not been withdrawn by TMAC at the time of the NWB's June 18, 2015 referral, and both applications also contained proposed updated Waste Rock Management Plans that were inconsistent, the NIRB requested on July 21, 2015 that TMAC provide clarification regarding the inconsistencies and whether the function of Pad T as a temporary storage area for ore would be related to the mine as currently approved, or as proposed within the amended mine plan still under assessment. On July 24, 2015 the NIRB received the requested clarification on the application and clarification on the scope of this interim proposed plan, which would only be in place until the amended mine plan assessment was complete.

The current application, and related file information are available from the NIRB's online public registry at the following location: <http://ftp.nirb.ca/03-MONITORING/05MN047-DORIS%20NORTH%20GOLD%20MINE/01-PROJECT%20CERTIFICATE/03-12.8.2%20AMENDMENTS/12.8.2%20AMENDMENT%20No.1/4-2AM-DOH1323%20AMENDMENT/01-APPLICATION/>.

## CURRENT APPLICATION

TMAC Resources Inc. is proposing to revise its Waste Rock and Ore Management Plan (noted as WR&OMP I), associated with NWB Licence No. 2AM-DOH1323, to include the construction, operation and decommissioning of a waste rock storage area, labelled as Pad T, which would include the following components:

- Construction of a 42,600 square metre waste rock storage pad identified as Pad T within the Doris North Gold Mine Project footprint and be constructed with a design capacity of 828,000 tonnes;
- Pad T would store a maximum of 560,000 tonnes of material;
- Use of Pad T for waste rock storage in the near term (2015-2016);

- Management of the area would be according to the Waste Rock and Ore Management Plan (WR&OMP I) version which would:
  - Be in place for a specific period of time to cover use of Pad T from Q3 of 2015, into 2016 until the assessment of the 12.8.2 amendment application was complete; and if approved to proceed then TMAC would be required to provide a revised Plan (either WR&OMP II as proposed in the 12.8.2 application).
  - Function under the criteria and scope of the previously approved mine plan, permitted under 2AM-DOH1323.
  - Includes activities that would require only revisions to the WR&OMP I associated with, but not requiring direct amendment to the water licence No. 2AM-DOH1323.

The NIRB understands that the material stored in Pad T would feature no changes to the previously identified waste rock characterization, handling or segregation methods, and would operate in accordance with all previously approved procedures and plans related to the Doris North Gold Mine Project. The NIRB also understands that Pad T would not store any material in excess of previously approved total storage volumes (560,000 tonnes) until further approvals were obtained.

Please note that Section 12.4.3 of the NLCA states that:

*“Any application for a component or activity of a project proposal that has been permitted to proceed in accordance with these provisions shall be exempt from the requirement for screening by NIRB unless:*

*(a) such component or activity was not part of the original project proposal; or*

*(b) its inclusion would significantly modify the project.”*

After completing a review of the information provided in support of the submitted revised Waste Rock and Ore Management Plan (WR&OMP I) application, and specifically to operations outlined by the scope listed above, the NIRB is of the understanding that the proposed revision does not change the general scope of the original project activities, and the exceptions noted in NLCA 12.4.3(a) and (b) do not apply.

Therefore, this application is exempt from the requirement for screening pursuant to Section 12.4.3 of the NLCA and the activities therein remain subject to the terms and conditions recommended in the original Project Certificate (enclosed).

If you have any questions or require additional clarification, please contact Tara Arko, Director, Technical Services, at (867) 983-4611 or [tarko@nirb.ca](mailto:tarko@nirb.ca).

Sincerely,

A handwritten signature in black ink that reads "Ryan Barry". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Ryan Barry  
Executive Director  
Nunavut Impact Review Board

cc: John Roberts, TMAC Resources Inc.  
Dave Hohnstein, Nunavut Water Board  
Sonia Aredes, Nunavut Water Board  
Geoff Clark, Kitikmeot Inuit Association  
John Roesch, Kitikmeot Inuit Association  
Georgina Williston, Fisheries and Oceans Canada  
Kathleen Cavallaro, Natural Resources Canada  
Doris North Distribution List

Enclosure: NIRB Project Certificate No. 003 (*September 15, 2006*)