



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

August 21, 2015

To: Doris North Distribution List

Sent via email

Re: Conformity Determination for the NIRB's Reconsideration of Terms and Conditions within Project Certificate No. 003 for TMAC's Doris North Project

Dear Parties:

On June 23, 2015 the Nunavut Impact Review Board (NIRB or Board) received TMAC Resources Inc.'s (TMAC or the Proponent) application which outlined proposed amendments under section 12.8.2 of the NLCA to the NIRB Project Certificate [No. 003] and Nunavut Water Board (NWB) Type A Water Licence 2AM-DOH1323 (known collectively as the "2015 amendment application") for proposed modification to the Doris North Gold Mine Project (Doris North project or the Project). On July 21, 2015 the NIRB acknowledged receipt of the 2015 amendment application and the NIRB requested clarification on the 12.8.2 application contents and the status of the Doris North project. On July 24, 2015 TMAC responded to the NIRB with a timeline for submission of documents related to the Doris North project moving out of care and maintenance and clarification related to materials within the 2015 amendment application.

The NIRB has completed its internal review of the 2015 amendment application submitted by TMAC and determined that the submission conforms to the Board's EIS Guidelines.¹ All materials received and pertaining to TMAC's 2015 amendment application are available from the NIRB's online public registry at:

<http://ftp.nirb.ca/03-MONITORING/05MN047-DORIS%20NORTH%20GOLD%20MINE/01-PROJECT%20CERTIFICATE/03-AMENDMENTS/12.8.2%20AMENDMENT%20No.1/>

PROJECT PROPOSAL OVERVIEW

As originally reviewed and approved under the NIRB's Project Certificate No. 003, the Doris North project is in the Kitikmeot Region approximately 125 kilometres south of Cambridge Bay. The Project involved the development of an underground mine with a single adit and ramp access with an overall project footprint of approximately 62 hectares. Ore was to be stockpiled and processed through a crushing and milling plant with a capacity of 668 tonnes per day, with

¹ NIRB Environmental Assessment Guidelines for the Doris Hinge Project, October 2002.

the gold product planned to be shipped off site in the form of dore bars. The original Project was expected to operate for 24 months, processing a total of 458,000 tonnes of ore yielding approximately 306,830 ounces of gold.

TMAC is proposing to include the following activities and changes to the Doris North project:

- Extend mine life by four additional years;
 - Mining multiple mineralized zones via the existing Doris North portal instead of the previously approved multiple pits;
- Increase mining and milling rates up to 2,000 tonnes/day;
- Increase volume of tailings to 2.5 million tonnes produced through mining of additional zones;
- Introduction of additional treatment measure (SO₂-Air Process) in the mill to destroy cyanide in tailings slurry with deposition of cyanide treated tailings underground as backfill;
- Flotation tailings to be disposed of as subaerial tailings at the south end of the tailings impoundment area (TIA);
 - Restructuring of TIA for subaerial tailings.
 - Installation of an interim dam in the TIA approximately midway.
 - Proposed south dam to construction to change from frozen core to frozen foundation.
 - North Dam to be breached at reclamation.
- Discharge of up to 7,000 metres³/day into Roberts Bay
 - Direct discharge of up to 3,000 m³/day of groundwater (saline) from underground year round.
 - Discharge of up to 4,000 m³/day from TIA during summer months.
 - Construction, operation and decommissioning of a 550 metre (m) access road at Roberts Bay and installation of 5.64 kilometres (km) of overland pipeline, 2.3 km long marine outfall pipeline, 95 m long marine diffuser and approximately 900 m long marine outfall berm.
- Construction, operation and decommissioning of two vents and associated spur roads, Doris central vent raise and Connector vent raise;
- Construction, operation and decommissioning of Pad U, a 31,000 m² pad and associated pollution control pond, for use as ore storage and temporary laydown area;
- Increase camp capacity to accommodate up to 280 personnel;
- Replace existing sewage treatment plant and retrofitting of existing sewage treatment plant for backup;
- Change water source for the Doris Camp from Doris Lake to Windy Lake;
- Use of materials from existing quarries A, B, D and 3 to supply foundation materials for additional infrastructure;
- Relocation of proposed landfill from Quarry A to Quarry 3 once the resources have been exhausted;
- Construction, operation and decommissioning of an additional laydown area at Roberts Bay and a proposed expansion of three existing laydown areas (West, Southwest and Southeast);
- Relocation of explosives facility to Quarry A;
- Over-wintering fuel barges as required to support operations; and

- Removal of on-site laboratory previously required for on-site water testing under Term and Condition 9 of the NIRB Project Certificate [No. 003].

TECHNICAL REVIEW PERIOD

The Technical Review Process

The technical review is meant to provide for a detailed review of the 2015 amendment application to analyze the adequacy and assess the quality of the information presented by the Proponent in its submission. This step in the NIRB's assessment of the 2015 amendment application involves parties' development of technical review comments which outline whether they agree with the Proponent's conclusions regarding the potential ecosystemic and socio-economic impacts of the proposed activities, the adequacy of proposed mitigation and monitoring measures and ultimately whether parties support the approval of the changes to the Doris North project as currently proposed. The Proponent will be provided with an opportunity to respond to parties' technical review comment submissions and the NIRB would schedule a meeting of technical experts if it is required following the provision of the Proponent's response package to facilitate further information exchange and assist with the formulation of parties' final written submissions. Interested parties, intervenors and the Proponent will be invited to provide final written submissions to the Board in advance of the Public Hearing for the 2015 amendment application and the Board's reconsideration of the Doris North Gold Mine Project Certificate pursuant to Section 12.8.2 of the Nunavut Land Claims Agreement (NLCA).

The development of technical review comments involves parties' formulation of information requests (IRs) that are based upon their review of the 2015 amendment application and the subsequent identification of any gaps or areas of uncertainty which must be addressed. The NIRB will provide additional guidance to parties regarding the suggested format and structure of submissions of technical comments following receipt of IRs.

Call for Information Requests

To facilitate the development of technical review comments by parties, the NIRB invites interested parties to provide the NIRB with IRs directed to the Proponent and/or other parties regarding the 2015 amendment application. It should be noted that IRs are not meant to serve as technical review comments, but rather should identify information gaps within the application that need to be addressed so that parties can develop their respective technical review comments. Please note that parties are encouraged to review Appendix A of this letter which provides the NIRB's suggested format for the submission of IRs. Parties are responsible to identify any IRs related to the 2013 amendment application that continues to apply to the 2015 amendment application.

By copy of this letter, the NIRB is requesting that responsible authorities, interested parties and those with specialist advice provide their information requests to the NIRB on or before **5:00 pm MST, September 11, 2015**.

NWB-NIRB Coordination

As noted above, the Proponent has also applied to the NWB to amend its Type A Water Licence (NWB File No. 2AM-DOH1323) for the Project, requesting that the NIRB and NWB consider coordinating their respective processes to the extent possible. As with the Board's previous NLCA Article 12, Part 5 Review of the Doris North Project, the NIRB is committed to sharing technical expertise, maintaining open communication and co-ordinating to the extent practical and appropriate with the NWB in a manner that recognizes our respective jurisdictions, mandates and processes while supporting timely and efficient consideration of these amendment requests. The NIRB and NWB will provide additional details regarding the coordination of the NIRB's Project Certificate reconsideration and the NWB Water Licence amendment processes once the NWB has completed conformity.

A summary of the next steps in the NIRB's reconsideration of the terms and conditions of the Doris North Project Certificate are as follows:

- Submission of Information Requests (IRs) directly to the NIRB by interested parties on or before **5:00 pm MST, September 11, 2015**.
- After considering all IRs and making decisions regarding their suitability, the NIRB will forward all appropriate requests to the Proponent (and other parties if applicable) by **September 16, 2015**. The NIRB will establish the timeline for response following a cursory review of the IRs received.

The NIRB reminds parties that Information Requests should be submitted to the Board via email at info@nirb.ca or by fax to **(867) 983-2594** on or before **5:00 pm MST, September 11, 2015**.

Should you have any questions or require further clarification regarding next steps in the NIRB's reconsideration of the Doris North Project Certificate please contact Kelli Gillard, Technical Advisor and Monitoring Officer for the Doris North Project at (867) 983-4619 or via email at kgillard@nirb.ca.

Sincerely,



Tara Arko
Director, Technical Services
Nunavut Impact Review Board

cc: David Hohnstein, Nunavut Water Board
Sonia Aredes, Nunavut Water Board
Phyllis Beaulieu, Nunavut Water Board
Geoff Clark, Kitikmeot Inuit Association
Karen Costello, Aboriginal Affairs and Northern Development Canada
Mark Dahl, Environment Canada
Georgina Williston, Fisheries and Oceans Canada
Kathleen Cavallaro, Natural Resources Canada
Meighan Andrews, Transport Canada
Tineka Simmons, Canadian Northern Economic Development Agency

Attachments: Appendix A: Suggested Format for Information Requests

APPENDIX A: SUGGESTED FORMAT FOR INFORMATION REQUESTS

Format & File Size

Parties are requested to provide information request submissions in a fully functional, electronically searchable Word or PDF file. Noting the current constraints with respect to internet bandwidth and speed, the NIRB requests that all submissions be submitted as individual files no larger than 5 MB.

Information Requests

The purpose of information requests is to identify information gaps or areas of uncertainty within the 2015 amendment application that need to be addressed so that parties can develop their respective technical review comments. Information requests can originate from, and be directed to, any of the parties involved in the assessment. Submissions must justify why the information required is necessary to facilitate the technical analysis of the 2015 amendment application and the potential impacts of the proposal. After considering all information requests submitted and making decisions regarding the suitability of each, the NIRB will forward all appropriate requests to the Proponent and/or other parties as applicable.

Parties are asked to ensure that information requests (IR) address the following points:

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| IR Source: | The overall submission should clearly identify the organization, department, or intervener submitting the request. |
| IR Number: | Each specific IR must be numbered in order to enable effective cross-referencing of the submission. |
| To: | Clearly identify to which organizations/departments/agencies the IR is directed [e.g., the Proponent and/or specific organization(s) of whom the information is requested]. |
| Subject: | Identify the issue; list the general subject or topic associated with the request (e.g., monitoring of sediment quality). |
| Reference: | A clear reference to any applicable document, section, and/or page number in the 2015 amendment application where information relevant to the request may be found. |
| Issue/Concern: | Provide background information and justification for the request. The issue/concern should identify any shortcomings of available information, concerns associated with the issue and how the requested information is relevant to the technical analysis of information within the 2015 amendment application. A clear rationale of the issue's importance to the impact assessment of the proposed project is required. |
| Information Request: | Specifically state the question and/or outline the specific information being requested to the organization. Separate items requested should be appropriately numbered in order to track the provision of responses. |