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November 18, 2015

Kelli Gillard
Nunavut Impact Review Board
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**Re: 05MN047 – TMAC response to the 2014-2015 NIRB Doris North Gold Mine Project
Recommendations**

Dear Kelli Gillard,

Thank you for your letter of October 23, 2015 providing your recommendations from the Board with respect to Project Certificate compliance and enclosed 2014-2015 *Annual Monitoring Report for the Doris North Gold Mine Project*. TMAC appreciates the board's guidance, and our responses to the five Board recommendations are below.

NIRB Recommendation 1: *The Board requires TMAC to consider the requirements for reporting as outlined in the Project Certificate, and undertake discussions with the NIRB's Monitoring Officer on how and when it would expect to reinstate the Project Certificate reporting expectations that were suspended by TMAC with the justification that the site was in care and maintenance. A response to this recommendation is required within 30 days of receipt of the Board's recommendations.*

TMAC Response: During care and maintenance, two aspects of Doris North project monitoring were modified. These related to 1) air quality and 2) wildlife.

1) Air Quality

During care and maintenance, air quality reporting was reduced to annually as a response to the reduce staffing at site during the winter months. With the resumption of Project activities in 2015, biannual Air Quality reporting has resumed. The Q1/Q2 Air Quality Monitoring Report will be submitted to the NIRB in November 2015. The Q3/Q4 report will be submitted with the 2015 Project Certificate Annual Report.

2) Wildlife Monitoring

During care and maintenance, wildlife monitoring was reduced to the care and maintenance-appropriate monitoring program outlined in the 2013 Wildlife Mitigation and Monitoring Plan (WMMP). The 2013 WMMP also outlined monitoring that would take place once the Project was resumed, which TMAC followed after the resumption

of Project construction in 2015. The results of the 2015 WMMP Report will be provided with the 2015 Project Certificate Annual Report. In accordance with the WMMP and Project Certificate 003, TMAC has also engaged the Government of Nunavut Department of Environment, Environment Canada, the Kitikmeot Inuit Association, and the recently formed Hope Bay Project Inuit Environmental Advisory Committee (IEAC) in a discussion of the Doris North wildlife monitoring, including the grizzly bear and wolverine programs and TMACs proposed revisions to the WMMP. In consideration of these discussions, a revised WMMP is now being finalized and will be submitted with the 2015 Project Certificate Annual Report. The revised WMMP will continue to outline the monitoring to take place under care and maintenance, construction, and operations.

TMAC would like to confirm that the site management plans currently submitted and approved for the Doris North Project are applicable to the current project activities and ensure compliance of site activities with Project Certificate 003 requirements. Doris North management plans will continue to be created, reviewed and updated on an as-needed basis to reflect Project and operational changes. All site activities are being conducted as appropriate for construction phase, and as outlined in the management plans, which are considered relevant until replaced.

NIRB Recommendation 2: Pursuant to Term and Condition 19 of the Project Certificate, the Board requires TMAC to repair the damaged thermistor and continue reporting the thermistor data throughout operations as committed to. Further, should TMAC wish the Board to re-visit this term and condition, a formal application should be made by TMAC to the Board. A response to this recommendation is required within 30 days of its issuance.

TMAC Response: The severed jetty thermistor will be examined and repaired, and monitoring will be resumed in 2016.

NIRB Recommendation 3: The Board requires TMAC to provide clarity regarding the numbers it selected for the Project footprint for its calculations and the definition of the area included in the calculations. If the calculations as submitted in the 2014 report are incorrect, the Board requests an updated analysis be provided. Additionally, the Board requests that TMAC provide predictions of any additional habitat loss that it anticipates would occur on site as per the currently approved Project and should include a breakdown of habitat loss by habitat type. A response to this recommendation is required within 30 days of its issuance.

TMAC Response: The 2015 WMMP Report, which will be submitted with the 2015 Project Certificate Annual Report, will provide a confirmation and update of habitat loss by habitat type to the end of 2015. As requested here, and in Recommendation 5, TMAC will also include a summary and schedule of predicted future habitat loss associated with completion of the currently permitted Doris North footprint.

NIRB Recommendation 4: The Board requires TMAC to identify if it has fulfilled the requirements of installing caribou crossing ramps at the Doris North site. A response to this recommendation is required within 30 days of its issuance.

TMAC Response: The Doris North site has been constructed with lower slope areas that allow caribou access. These include locations at Roberts Bay, along the Doris-Roberts Bay

road, the access road to Quarry 2, the Doris Float Plane dock access, the east side of the Doris Creek bridge abutment, and the TIA access road. During the construction of the road to the TIA South Dam TMAC will seek IEAC input on the placement of additional caribou access ramps.

NIRB Recommendation 5: *The Board requires TMAC to provide an update on projected timelines for the construction of outstanding infrastructure included within the scope of the Doris North Project. A response to this recommendation is required within 30 days of its issuance.*

TMAC Response: A schedule of projected construction timing of outstanding Doris North infrastructure follows; Pad T will be constructed as needed and will be fully completed by the end of 2017. The South Dam Road is now being constructed and will reach the location of Quarry 3 in Q2 2016. The airstrip expansion is currently nearing completion, and is expected to be completed by Dec 31, 2015. On the approval of the proposed amendments to the Doris Project Certificate and Water Licence, the road to the South Dam will be completed and the South Dam Constructed. Doris North Quarries will be mined as needed for the construction and maintenance of project components.

TMAC appreciates the opportunity to respond to the NIRBs recommendations. Should you have any questions regarding this response, please do not hesitate to contact me at john.roberts@tmacresources.com.

Sincerely,



M. John Roberts
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