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May 25, 2015

Nunavut Water Board (NWB)
P.O. Box 119
Gjoa Haven, NU X0B 1J0
(867) 360-6338

Attention: Stephanie Autut, Executive Director

Re. TMAC Resources Inc.'s Revisions to Amendment Application No. 1 of Project Certificate No. 003 and Water Licence No. 2AM-DOH1323: Request for Direction on Nunavut Water Board (NWB) Procedural Matters

Dear Sirs and Mesdames:

TMAC Resources Inc. (TMAC) acknowledges and appreciates the coordinated efforts to date of the Nunavut Impact Review Board (NIRB), NWB and their respective staff in respect of TMAC's *Revisions to Amendment Application No. 1 of Project Certificate No. 003 and Water Licence No. 2AM-DOH1323* (the Amendment Application). We also appreciate the continuing engagement of the parties in this process.

As the NWB is aware, the NIRB public hearing completed on April 14, 2016 and the NIRB is endeavoring to issue its recommendation to the Minister of Indigenous and Northern Affairs (INAC) on or before May 30, 2016. While the NIRB has not yet issued its decision, we were encouraged to hear during the NIRB hearings that the Kitikmeot Inuit Association (KIA) is strongly supportive and that no parties or members of the public are opposed to the Amendment Application.

In light of the anticipated timing of the NIRB recommendation and the upcoming NWB meeting scheduled for May 31, 2016, TMAC is writing to request that the NWB provide direction with respect to next steps. In this letter, TMAC has identified three procedural matters for NWB consideration.

A. Timing of NWB Notice of Public Hearing

The necessary Doris Mine regulatory approvals must be obtained by TMAC before significant project benefits can be provided to Inuit and to the public. As stated at the NIRB public hearing, TMAC is scheduled to commence certain activities related to the Amendment Application during summer 2016, and to begin gold production at the end of this year. This is also the timing that TMAC has presented to the people of the Kitikmeot region, Nunavut Tunngavik Inc. and the KIA. TMAC wishes to ensure that it meets all NWB requirements necessary to achieve the earliest possible NWB public hearing date.

NWB staff has advised TMAC that the NWB pre-hearing conference likely would need to be completed prior to the issuance of the NWB public hearing notice. Therefore, TMAC respectfully requests that the NWB consider issuing a public hearing notice as soon as possible following the pre-hearing conference and the issuance of a positive NIRB recommendation to the Minister.

TMAC is aware that in the usual course, NWB notice of public hearing is issued following NWB receipt of (1) the Minister's NIRB recommendation decision and (2) an amended NIRB project certificate. However, it is TMAC's submission that in this case the NWB should not delay its notice of public hearing until both of these steps are complete. The coordinated Amendment Application process has featured much heavier early engagement by NWB, TMAC and the parties on licencing matters than would usually occur during the standard Type A Water Licence application process. As a result, NWB matters are much more advanced than would normally be the case at this stage.

Provided the NIRB's recommendation is positive, it is TMAC's hope that a NWB public hearing on the Amendment Application could be held during late August 2016 or the first week of September 2016. The following procedural requests are drafted with this timing in mind.

B. Timing of Review of Additional Technical Information

Since the January 2016 NWB Technical Meeting, TMAC has been working closely with all parties. The NWB issued a table tracking the status of NWB technical matters on May 18, 2016 (the NWB Technical Review Table). Based on the NWB Technical Review Table and our discussions with NWB staff, TMAC understands that there are no significant unresolved matters and that the NWB does not believe any further technical meetings will be necessary.

To address the only outstanding items listed in the NWB Technical Review Table, TMAC intends to submit drafts of the following documents to the NWB on or before June 1, 2016:

- Aquatic Effects Monitoring Program;
- Groundwater Management Plan;
- Tailings Impoundment Area Operation, Maintenance and Surveillance Manual (Tailings Management Plan)

(collectively, the Plans).

TMAC is aware that the NWB often circulates management plans for a 30 day review and comment period, but requests that the NWB consider setting a 21 day Plan review and comment period in this case for the following reasons:

- NWB staff has advised TMAC that it may not be possible to schedule the pre-hearing conference to occur prior to the end of the Plan comment and review period.
- TMAC has had many discussions with various parties about the content of the Plans in advance of filing, including circulation of detailed plan outlines. As a result, TMAC does not anticipate a significant volume of review comments on the Plans.
- TMAC will copy all parties on the June 1, 2016 submission to NWB.
- In person meetings have been scheduled between TMAC and the parties during June 6-8, 2016 to provide an opportunity for Plan feedback and refinement as well as continuing engagement on technical matters (this timing coincides with the Aquatic Working Group meeting).
- Outside of these dates, TMAC will continue to be available to parties, the NWB and the public for discussion about the Plans or any aspect of the Amendment Application.
- In the usual course, plan review often occurs during the post-licensing phase. As an example, final approval of the Tailings Management Plan was not required prior to the issuance of the current Type A Water Licence; Part G item 25 of 2AMDOH-1323 requires Tailings Management Plan submission for NWB review six (6) months prior to Operations. In the event matters relating to the Plans are not resolved prior to and during the NWB public hearing, it would be open to NWB to take a similar approach in this case.

Accordingly, TMAC requests that the NWB consider setting a deadline of June 22, 2016 to receive comments from parties on the Plans (based on a TMAC submission date of June 1, 2016). TMAC commits to providing the NWB with a written response to party comments on or before June 29, 2016.

C. Timing of NWB Pre-Hearing Conference

TMAC requests that the NWB schedule a pre-hearing conference to be held by conference call on or before June 24, 2016, with a notice of public hearing to be issued as soon as possible following completion of that meeting (assuming the NIRB recommendation is positive).

In addition to providing written responses to Plan review comments by June 29, 2016, TMAC would also be prepared to verbally address Plan review comments during the pre-hearing conference.

D. Closing

TMAC thanks the NWB for its time and consideration of these important matters. We look forward to receiving further direction from the NWB regarding anticipated next steps following your meetings. Should you have any questions or require further information to support the requests made herein, please contact John Roberts at john.roberts@tmacresources.com.

Regards,



M John Roberts
Vice President, Environmental Affairs

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cc. Sonia Aredes, NWB
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Your Name
Your Title