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Sent via Email: licensing@nwb-oen.ca; derek.donald@nwb-oen.ca

Re: CIRNAC Comments on 2019 Annual Geotechnical Inspection Report for the Tailings Impoundment Area Hope Bay Project, Nunavut

Dear Mr. Donald,

On September 25, 2020, TMAC Resources Inc. (TMAC) received from the Nunavut Water Board (NWB) a comment on behalf of the Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC) regarding the results of the Hope Bay Project 2019 Annual Geotechnical Inspection (AGI) of the Doris Tailings Impoundment Area conducted by SRK Consulting (Canada) Inc. TMAC's response to the comment is detailed below.

1. Implications of North Dam Hazard Re-Classification

CIRNAC Comment: Table A: Summary of 2019 AGI Recommendations of the Report titled 2019 Annual Geotechnical Inspection Tailings Impoundment Area Hope Bay Project, Hope Bay, Nunavut, written by SRK Consulting (2020, page iii) states under Inspection Item Third Party Dam Safety Review that "The North Dam hazard classification was revisited and is considered HIGH. This requires an independent third-party Dam Safety Review by 2021." CIRNAC acknowledges that the Licensee has been advised in 2018 and in 2019 to conduct an independent third-party Dam Safety Review for both the North and South Dams in the summer of 2021, and CIRNAC supports this recommendation.

Given the new hazard classification of the North Dam in 2018, this may have implications on risks of dam failure, and the associated strategy to manage those risks. It is not clear whether TMAC has identified any specific mitigation measures to be implemented at the North Dam before the indicated Dam Safety Review takes place in 2021, and if so, what those measures will entail.

CIRNAC Recommendation(s): (R-01) CIRNAC recommends that TMAC clarify whether they have identified any specific mitigation measures that need to be

implemented at the North Dam before the indicated Dam Safety Review takes place as a result of the North Dam hazard re-classification. If so, TMAC should indicate what mitigation measures are being implemented. If no specific risk mitigation measures have been identified, CIRNAC recommends clarifying the rationale for not changing the management strategy to reflect the new the hazard classification.

TMAC Response: TMAC would like to clarify that dam hazard classifications are reviewed on an annual basis as part of the AGI however there was no change or 're-classification' to the dam hazard classification(s) as results of the 2019 AGI. The hazard classification review in 2019 confirmed the dam hazard classification(s) *remained* at 'HIGH'.

Originally, both the North and South Dams were classified as "Low Hazard" according to the Canadian Dam Association Dam Safety Guidelines (CDA 1999) (SRK 2007). As part of the Doris 2015 Amendment application, SRK Consulting reassessed the hazard classification of the TIA containment structures considering the most recent Dam Safety Guidelines (CDA 2013), as well as the CDA Technical Bulletin on Application of Dam Safety Guidelines to Mining Dams (CDA 2014). Based on the revised guidelines, and the commencement of the deposition of tailings, the containment structures were assigned an overall dam hazard classification of 'HIGH'. Regardless of this schedule, mitigation measures implemented at site have always remained commensurate with the classification and risks, as documented in annual AGI reports. Further discussion can be found in the 2017 Annual Geotechnical Inspection Report, Tailings Impoundment Area, Doris Project, Hope Bay, Nunavut (March 2018), written by SRK Consulting.

Should you have any further questions please feel free to contact me at oliver.curran@tmacresources.com.

Sincerely,



Oliver Curran

Vice President, Environmental Affairs, TMAC

Cc:

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