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April 9, 2019

Derek Donald Technical Advisor Nunavut Water Board P.O. Box 119 Gjoa Haven, NU, X0B 1J0

Sent via Email: <u>licensing@nwb-oen.ca</u>; <u>derek.donald@nwb-oen.ca</u>

Re: TMAC Response to Comments Received Regarding Notification of Construction of the All-Weather Road km 0-1 and Contact Water Pond at Madrid North

Dear Mr. Donald,

On April 2, 2019, TMAC Resources Inc. (TMAC) received comments from Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC) in relation to the Notification of Construction submitted by TMAC for the All-Weather Road km 0-1 and Contact Water Pond at Madrid North.

TMAC's responses to CIRNAC's comments, along with signed and stamped "Issued for Construction" drawings, are presented in Attachment A of this submission.

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:

Ida Porter (NWB) Kyle Conway (TMAC) Sarah Warnock (TMAC) Brendan Barron (TMAC) Bridget Cambell (CIRNAC)

Attachment A: TMAC Response to Comments Received Regarding Notification of Construction of the All-Weather Road km 0-1 and Contact Water Pond at Madrid North

Attachment A: TMAC Resources Inc. Responses to Crown-Indigenous Relations and Northern Affairs Canada Comments on Notification of Construction of the Contact Water Pond Berm as part of Madrid North, Water Licence 2AM-DOH1335 - Amendment No. 2

Agency Comment	Topic	Reference	Comment	Recommendation	TMAC Response
CIRNAC-1	Minimization of soil and permafrost disturbance	o TMAC Resources Inc., Notification of Construction, Detailed Design of the Contact Water Pond Berm at Madrid North, March 19, 2019.	TMAC has indicated in the Detailed Design of the Contact Water Pond Berm at Madrid North, under Section 3.1 Berm Design Criteria, that soil and permafrost disturbance should be minimized. TMAC does not indicate how minimization of disturbance will be achieved or what mitigations will be put in place in the case of unexpected soil disturbances.	CIRNAC recommends that TMAC provide further details to describe how any unexpected soil disturbance, including permafrost degradation resulting from the contact water pond berm construction activities, will be mitigated.	Construction will be undertaken in accordance with the Technical Specifications (SRK Consulting (Canada) Inc., 2018. Technical Specifications Earthworks and Geotechnical Engineering. Hope Bay Project, Nunavut, Canada Revision H - Issued for Construction. Report Prepared for TMAC Resources Inc., 1CT022.031. April 2018). These Specifications includes specific clauses and procedures specifically intended to ensure preservation of permafrost. The Specifications has been in effect since construction started at Hope Bay in 2007 and has proven to be effective, as there has never been any instances where unnecessary permafrost damage has occurred because of construction activities.
					In the highly unlikely event that such damage would occur, TMAC will have the damage inspected by the Design Engineer who will provide an appropriate unique remediation plan that will ensure that the Contact Water Pond will still meet its design criteria while ensuring mitigation of the permafrost damage. I is not possible (or appropriate) to provide a prescriptive remediation plan for unknown (and unanticipated) damage at this time, as every solution needs to be unique.
CIRNAC-2	Linear System Design Criteria	o TMAC Resources Inc., Notification of Construction, Detailed Design of the Contact Water Pond Berm at Madrid North, March 19, 2019.	TMAC has indicated in the Detailed Design of the Contact Water Pond Berm at Madrid North, under Section 3.2 Liner System Design Criteria, angles in degrees which need to be rectified to properly match their slope gradients. The angles in degrees should be 33.70 for a 1.5H:1V slope gradient, and 26.50 for a 2H:1V slope gradient.	CIRNAC recommends that TMAC rectify the angles provided to properly match their slope gradients.	TMAC acknowledges that there was an error in the angles listed in degrees in the Technical Memo. The angles in degrees should be 33.7 degrees for a 1.5H:11Y slope gradient. It should be noted that the Issue-For-Construction (IFC) Drawings do not show degrees but only show the slope ratios as per normal practice and these slope ratios ar correct.
CIRNAC-3	Installation Requirements for Monitoring Devices	o TMAC Resources Inc., Notification of Construction, Detailed Design of the Contact Water Pond Berm at Madrid North, March 19, 2019.	TMAC has indicated in the Detailed Design of the Contact Water Pond Berm at Madrid North, under Section 3.3 Design Overview, that monitoring devices will be installed to measure berm settlement. TMAC does not provide any installation requirements for these monitoring devices.	CIRNAC recommends that TMAC provide installation requirements for the indicated monitoring devices required to measure berm settlement.	Surficial survey monitoring points, consisting of a permanent steel survey marker installed in a ROQ boulder, will be installed to monitor for any settlement. Survey points will be installed at two longitudinal transects along the dam; one at the upstream crest and one approximately 2 m below the cres on the downstream slope. The frequency of survey points will be approximatel every 20 m. These survey points will be installed after the Contact Water Ponc construction has been completed. An Issue-For-Construction drawing is being submitted to the Nunavut Water Board as part of this package.
CIRNAC-4	Construction Standards	o TMAC Resources Inc., Notification of Construction, Detailed Design of the Contact Water Pond Berm at Madrid North, March 19, 2019.	TMAC has indicated in the Detailed Design of the Contact Water Pond Berm at Madrid North that they will lay and compact bedding material, made of crushed and screened geochemically suitable quarry or waste rock material, underneath the high-density polyethylene liner. However, the standard to which the bedding material will be compacted is not provided.	CIRNAC recommends that TMAC specify the standard to which bedding material compaction must be done.	Bedding material will be placed in accordance with the Technical Specification (SRK Consulting (Canada) Inc., 2018. Technical Specifications Earthworks and Geotechnical Engineering. Hope Bay Project, Nunavut, Canada. Revision H-Issued for Construction. Report Prepared for TMAC Resources Inc., 1CT022.031 April 2018). The Specification state that Bedding material underlying geosynthetic products must be compacted to 95% of the maximum dry density (ASTM D698). A method specification may be introduced by the contractor if they can demonstrate a minimum number of passes to achieve the target density, given the equipment to be used during construction.

TMAC Resources Inc. Responses to Crown-Indigenous Relations and Northern Affairs Canada Comments on Notification of Construction of the All Weather Road km 0-1 as part of the Madrid North, Water Licence 2AM-DOH1335 - Amendment No. 2

Agency Comment	Topic	Reference	Comment	Recommendation	TMAC Response
CIRNAC-1		TMAC Resources Inc., Notification	The AWR design memo and drawings submitted by TMAC are well	CIRNAC recommends that TMAC provide the IFC	TMAC are providing the stamped and signed IFC drawings in this package.
		ofConstruction, Hope Bay Project -		drawings with stamps and signatures	
		Madrid South All-Weather Road (0 to		from a qualified Professional Engineer in good	
		1 km) Detailed Design Package, March		standing with the Northwest Territories and	
		19, 2019.	a qualified Professional Engineer in good standing with the Northwest	Nunavut Association of Professional Engineers and	
			· · · · · · · · · · · · · · · · · · ·	Geoscientists.	
		Nunavut Water Board Water Licence	Geoscientists. This is outlined in the Water		
		No. 2AM-DOH1335 - Amendment 2	Licence Schedule D, Item 1(g).		
CIRNAC-2	Timing of	TMAC Resources Inc., Notification of	In phone and e-mail correspondence, TMAC has requested to commence	CIRNAC recommends the following as conditions to	1) Based on correspondance recived on April 5, 2019, CIRNAC have reviced the
		Construction, Hope Bay Project -	construction of the AWR prior to the completion of the 60 day review		letters from TMAC and they are reviewing the adequacy of the letters to
				the AWR prior the completion of the 60 day review	ensure that they are acceptable to the Minister.
		km) Detailed Design Package, March		period which usually follows the	2) TMAC is submitting the stamped and signed Issued For Construction drawings
					as part of this package to the NWB.
				(1) that CIRNAC receives and accepts security for	3) TMAC requests that the Nunavut Water Board approve the propsed change in
		Indigenous			duration of the review period.
		Relations and Northern Affairs		(2) that comment No. 1 is resolved by submitting	
		Canada, the Nunavut Water Board,		drawings which contain stamps and	
		and th Kitikmeot Inuit Association,		signatures from a qualified professional engineer;	
		regarding the 60 day review period	CIRNAC does not have any concerns with TMAC commencing construction		
		between IF submissions and	of the AWR km 0 to km 1 as presented in the design package, provided	(3) that the Nunavut Water Board approves the	
		construction commencement, dated	that IFC drawings are stamped by a qualified engineer, as noted above in		
		March 22, 2019.	comment No. 1, and that security for Madrid North is received and	review period.	
		None of Water Based Water Lines	accepted by CIRNAC prior to the commencement of construction		
		Nunavut Water Board Water Licence	activities.		
		No. 2AM-DOH1335 - Amendment 2			

Engineering Drawings for the Madrid North Contact Water Pond Hope Bay Project, Nunavut, Canada

Active Drawing Status

Drawing Number	Drawing Title	Issue	Date	Revision
MN-CWP-01	General Arrangement (With Orthophoto)	Issued for Construction	March 19, 2019	0
MN-CWP-02	General Arrangement	Issued for Construction	March 19, 2019	0
MN-CWP-03	Contact Water Pond Anticipated Foundation Conditions Plan and Profile	Issued for Construction	March 19, 2019	0
MN-CWP-04	Contact Water Pond Plan and Profile	Issued for Construction	March 19, 2019	0
MN-CWP-05	Contact Water Pond Typical Sections	Issued for Construction	March 19, 2019	0
MN-CWP-06	Contact Water Pond Typical Details	Issued for Construction	March 19, 2019	0
MN-CWP-07	Liner Tie-in Typical Details	Issued for Construction	March 19, 2019	0

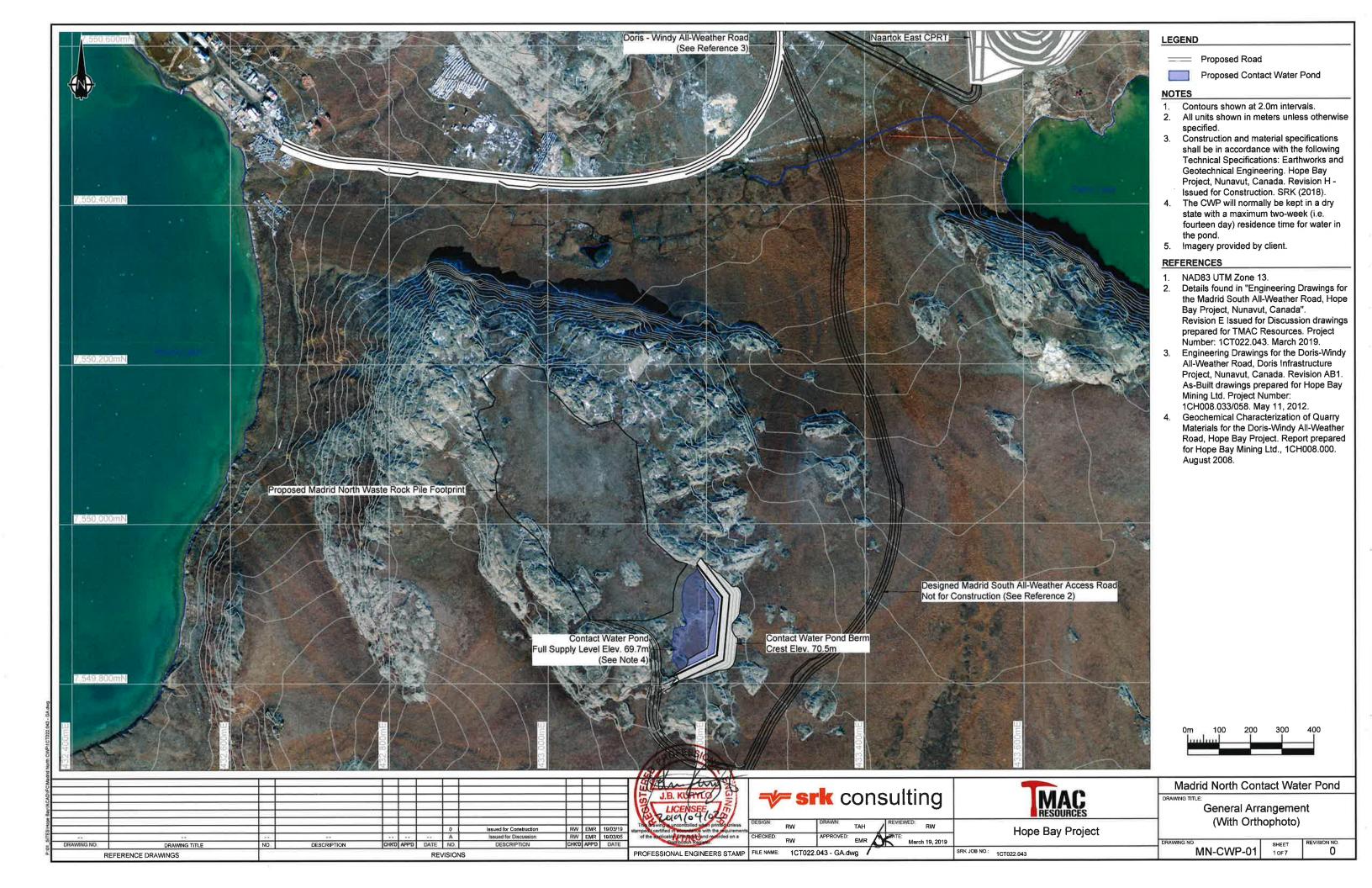


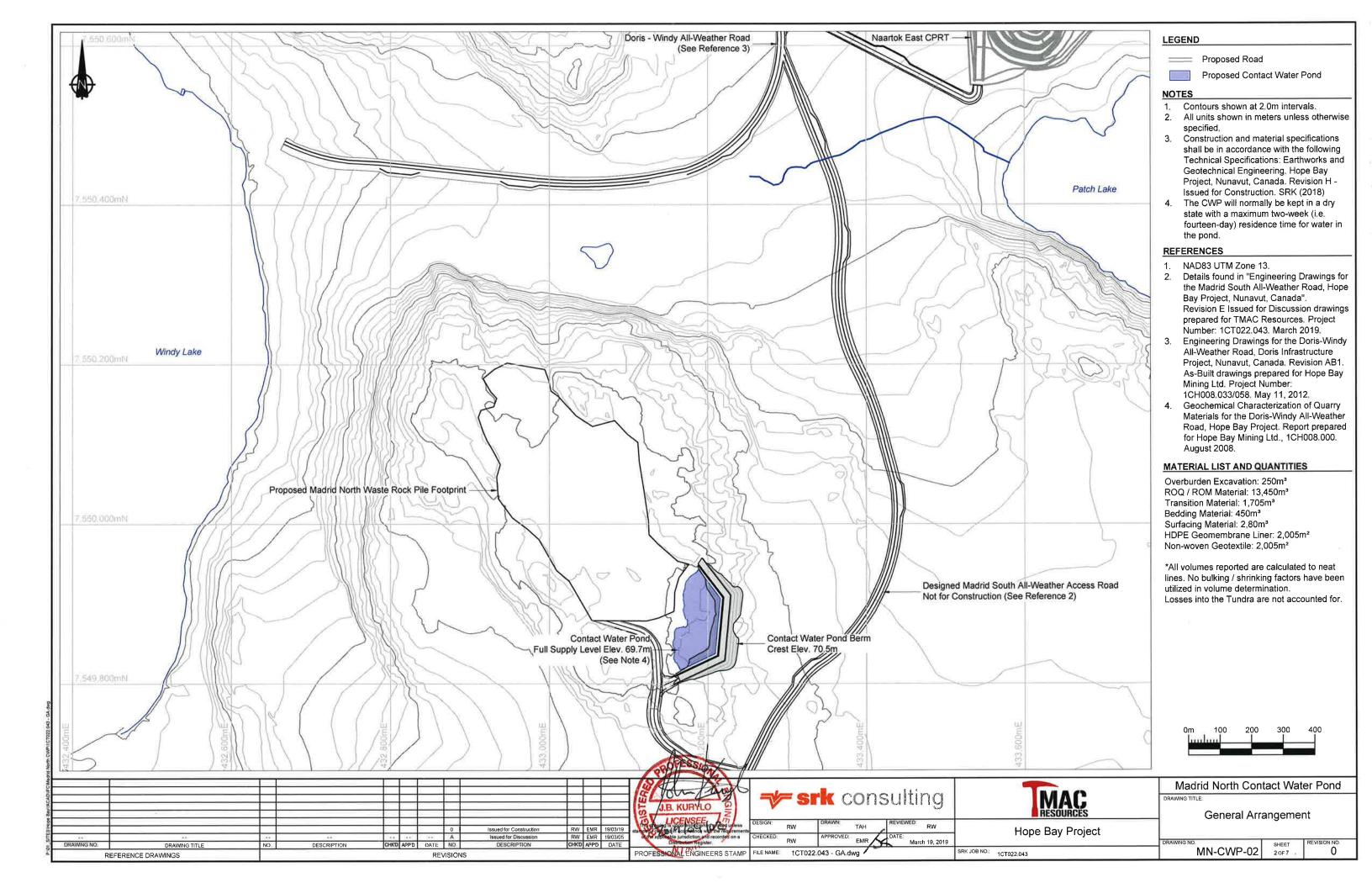
Signed and stamped copies

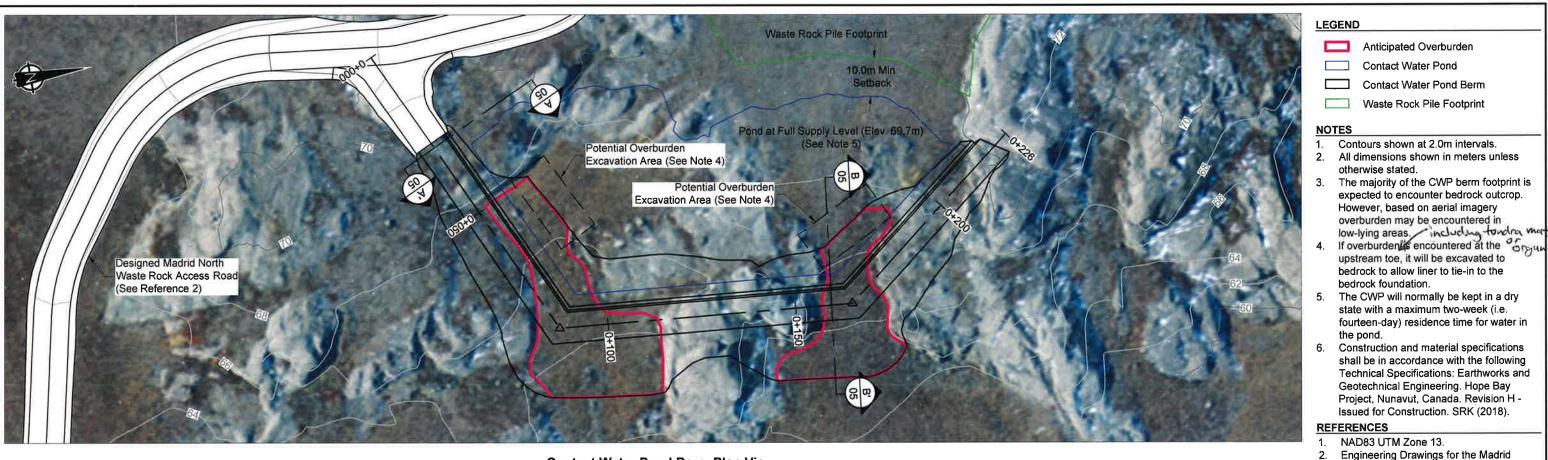
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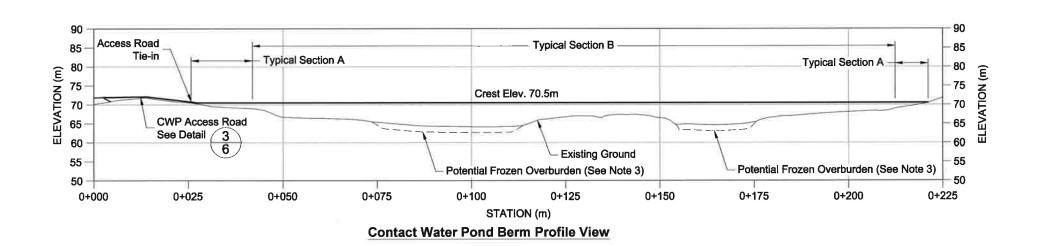
Project Number: 1CT022.043

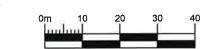






Contact Water Pond Berm Plan View





Contact Water Pond Berm Waste Rock Pile Footprint

South All-Weather Road, Hope ay Project, Nunavut, Canada. Issued for Discussion. Revision A. Project No. 1CT022.043.

Geochemical Characterization of Quarry Materials for the Doris-Windy All-Weather Road, Hope Bay Project. Report prepared for Hope Bay Mining Ltd., 1CH008.000.

March 2019.

August 2008.

DESCRIPTION PROFESSIONAL ENGINEERS STAMP | FILE NAME: 1CT022.043 - OB.dwg REVISIONS

DRAWING TITLE

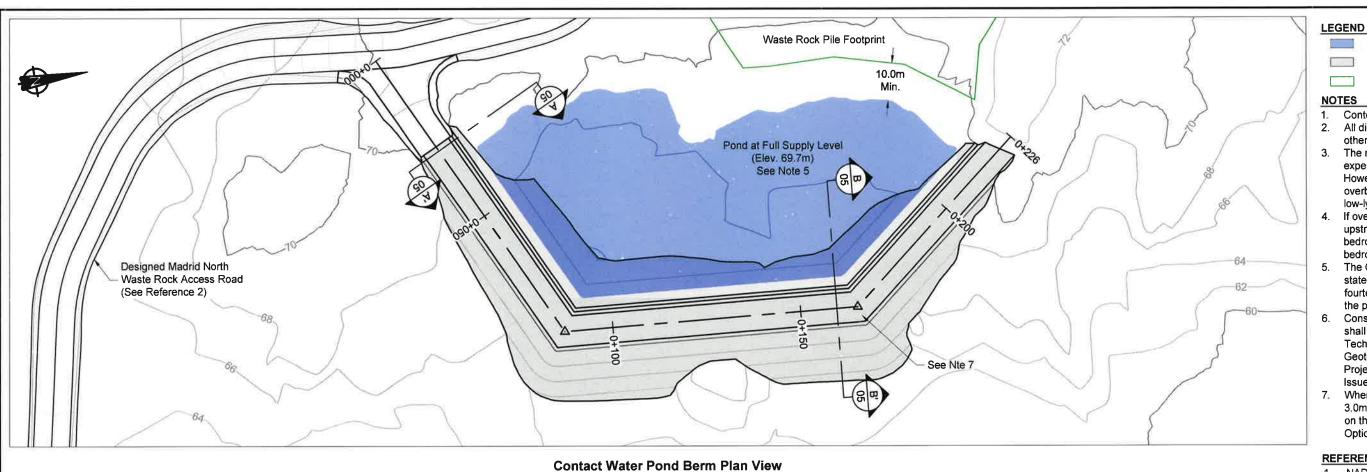
REFERENCE DRAWINGS

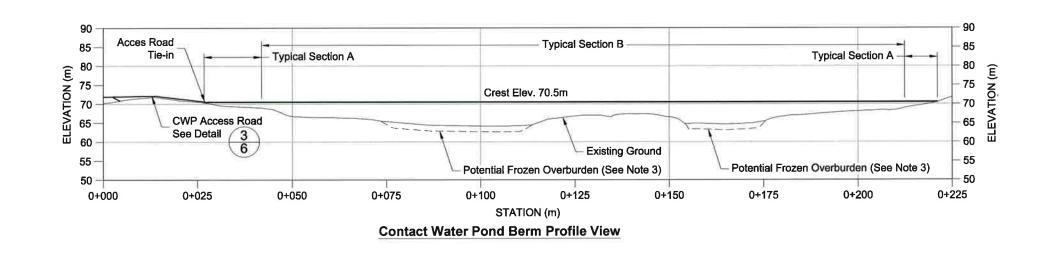
srk consulting

Hope Bay Project SRK JOB NO : 1CT022.043

Madrid North Contact Water Pond DRAWING TITLE: Contact Water Pond **Anticipated Foundation Conditions** Plan and Profile

MN-CWP-03





Contact Water Pond

Contact Water Pond Berm

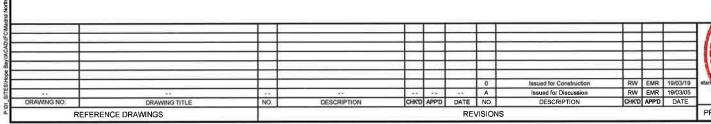
Waste Rock Pile Footprint

- Contours shown at 2.0m intervals.
- All dimensions shown in meters unless otherwise stated.
- The majority of the CWP berm footprint is expected to encounter bedrock outcrop. However, based on aerial imagery overburden may be encountered in low-lying areas.
- If overburden is encountered at the upstream toe, it will be excavated to bedrock to allow liner to tie-in to the bedrock foundation.
- 5. The CWP will normally be kept in a dry state with a maximum two-week (i.e. fourteen-day) residence time for water in the pond.
- Construction and material specifications shall be in accordance with the following Technical Specifications: Earthworks and Geotechnical Engineering. Hope Bay Project, Nunavut, Canada, Revision H -Issued for Construction, SRK (2018).
- Where the height of the berm exceeds 3.0m, safety berms or barries are required on the crest. See Typical Berm Barrier Options on drawing MN-CWP-06.

REFERENCES

- NAD83 UTM Zone 13.
- Engineering Drawings for the Madrid South All-Weather Road, Hope ay Project, Nunavut, Canada. Issued for Discussion. Revision A. Project No. 1CT022.043 March 2019.
- Geochemical Characterization of Quarry Materials for the Doris-Windy All-Weather Road, Hope Bay Project. Report prepared for Hope Bay Mining Ltd., 1CH008.000. August 2008.







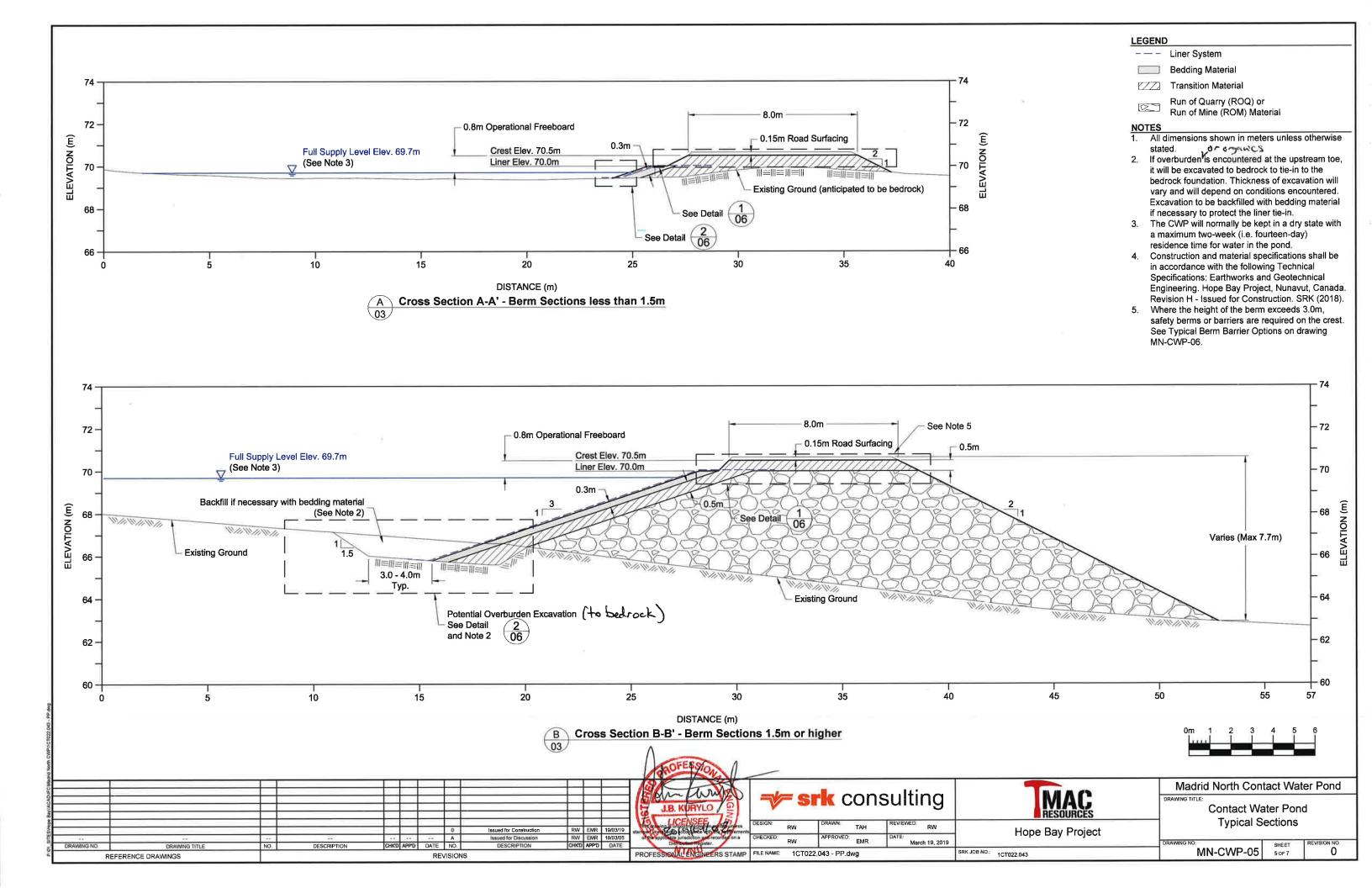


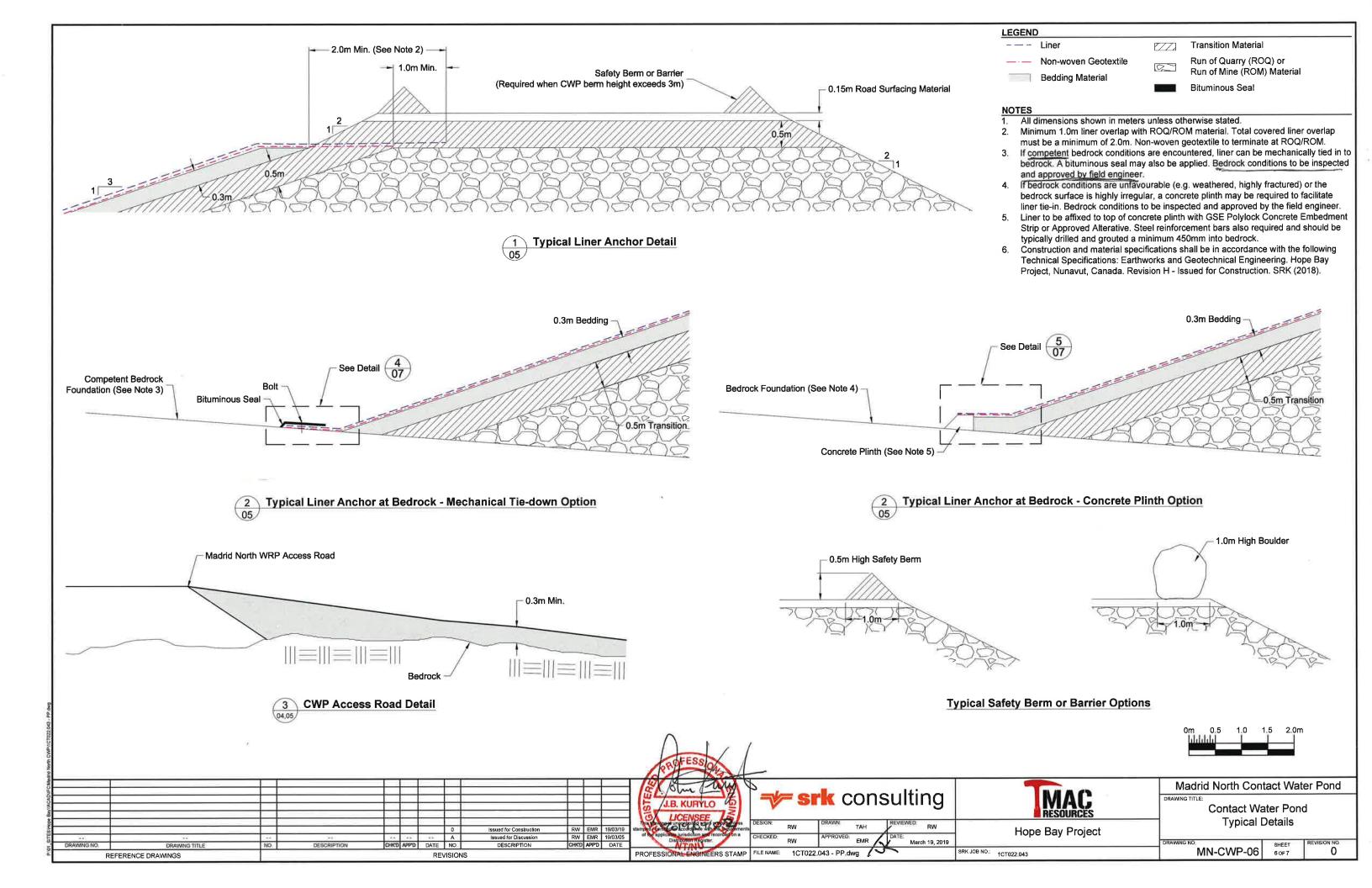


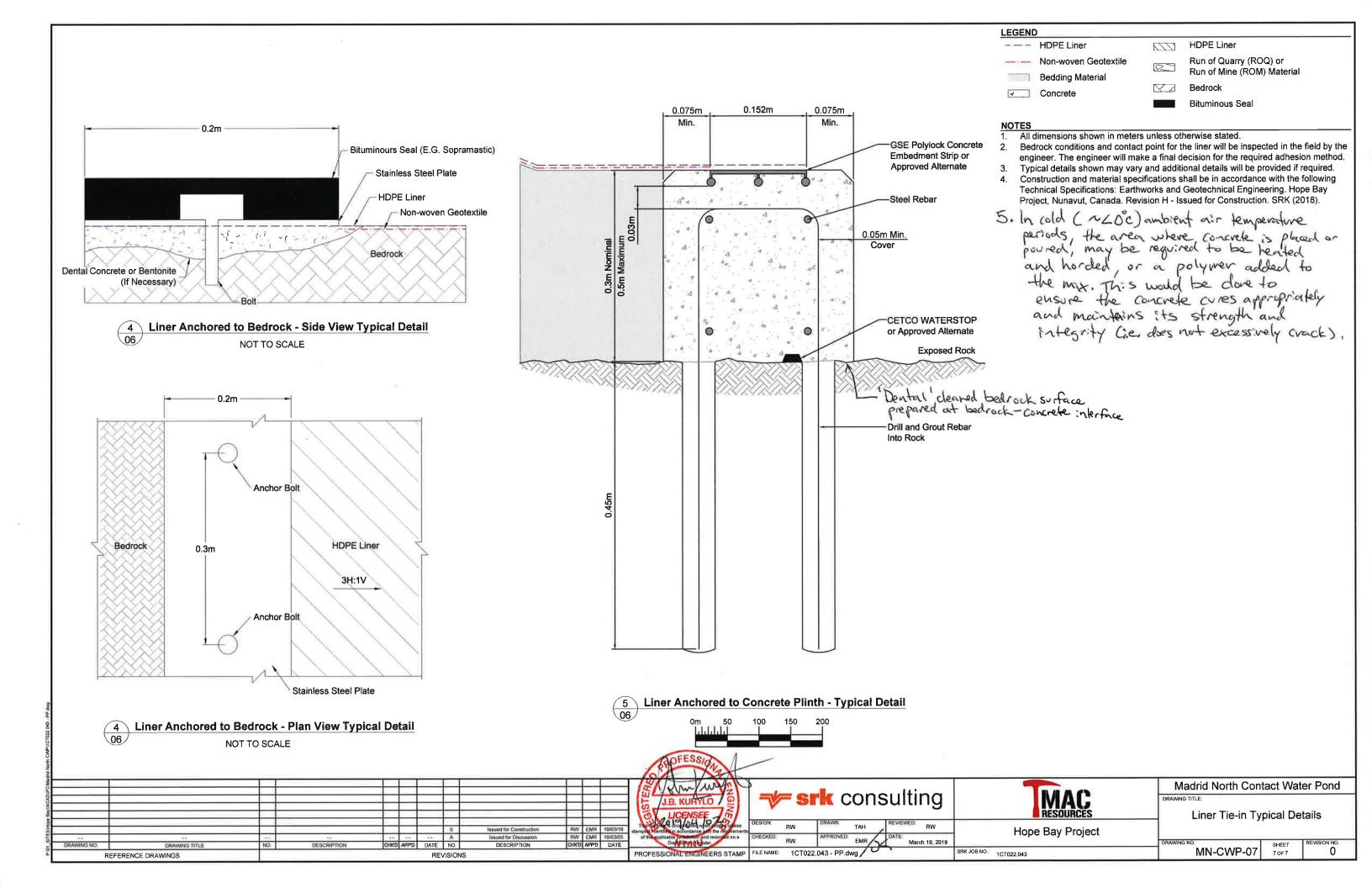
Madrid North Contact Water Pond DRAWING TITLE:

Contact Water Pond Plan and Profile

MN-CWP-04	SHEET 4 OF 7	REVISION NO.
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Engineering Drawings for the Madrid South All-Weather Road, Hope Bay Project, Nunavut, Canada

ACTIVE DRAWING STATUS

DWG NUMBER	DRAWING TITLE	REVISION	DATE	STATUS
MSR-00	Engineering Drawings for the Madrid South All-Weather Road, Hope Bay Project, Nunavut, Canada	0	Mar. 18, 2019	Issued for Construction
MSR-01	General Arrangement (with Orthophoto)	0	Mar. 18, 2019	Issued for Construction
MSR-02	General Arrangement	0	Mar. 18, 2019	Issued for Construction
MSR-03	Road Alignment Plan and Profile (1 of 5)	0	Mar. 18, 2019	Issued for Construction
MSR-04	Road Alignment Plan and Profile (2 of 5)	A	Mar. 14, 2014	Issued For Discussion
MSR-05	Road Alignment Plan and Profile (3 of 5)	А	Mar. 14, 2014	Issued For Discussion
MSR-06	Road Alignment Plan and Profile (4 of 5)	А	Mar. 14, 2014	Issued For Discussion
MSR:07	Road Alignment Plan and Profile (5 of 5)	D	Mar. 14, 2014	Issued For Discussion
MSR-08	Typical Road and Crossing Details	0	Mar. 18, 2019	Issued for Construction
MSR-09	Animal Crossings Plan and Sections	0	Mar. 18, 2019	Issued for Construction
MSR-10	Crossing #1 - Bridge Option - Plan, Section and Detail (1 of 2)	А	Mar. 14 <u>.</u> 2014	Discontinued (Removed)
MSR-11	Crossing #1 - Bridge Option - Plan, Section and Detail (2 of 2)	А	Mar. 14, 2014	Discontinued (Removed)
MSR-12	Crossing #1 - Arch Culvert Option	А	Mar. 14, 2014	Discontinued (Removed)
MSR-13	Crossing #2 - Arch Culvert	А	Mar. 14, 2014	Discontinued (Removed)
MSR-14	Typical Arch Culvert Plan and Profile (1 of 2)	А	Mar. 14, 2014	Discontinued (Removed)
MSR-15	Typical Arch Culvert Details (2 of 2)	А	Mar. 14, 2014	Discontinued (Removed)
MSR-16	Material List and Quantity Estimates	В	Aug. 5, 2014	Issued For Discussion
MSR-17	Madrid North Waste Rock Access Road Plan and Profile	0	Mar. 18, 2019	Issued for Construction
MSR-18	Naartok East CPRT Access Road Plan and Profile	0	Mar. 18, 2019	Issued for Construction



Signed and Stamped copies
2019/04/02
STK consulting

PROJECT NO: 1CT022.043
Revision 0
March 18, 2019
Drawing MSR-00

