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August 5, 2015

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Dear Ms. Beaulieu, Ms. Aredes;

Re: Part G Item 19 of 2AM-DOH1323, Request for Approval of Revised *Waste Rock and Ore Management Plan - Responses to Party Comments (EC)*

With respect to the Request for approval of the revised Doris *Waste Rock and Ore Management Plan* (*WR&OMP I*) submitted to the Nunavut Water Board (NWB) on May 1, 2015, TMAC Resources Inc. (TMAC) provided responses to comments received from Environment Canada (EC) on July 20, 2015. Subsequent to those responses, EC requested further clarification; responses are addressed herein in Table 1.

Note that the majority of comments from EC pertain to material that has not changed since the *WR&OMP* was approved in 2010. Prior to this approval, the NWB sent the *WR&OMP* (2010) out for Party comment on Feb 10, 2011. In response, EC provided comments on March 10, 2011. The *WR&OMP* (2010) was subsequently approved by the NWB on March 30, 2012 through Motion No. 2011-21-L09.

TMAC wishes to reiterate that approval of the version of the WROMP currently under review (*WROMP I*) will allow TMAC to construct and utilize Pad T for waste rock storage in the near term to support current approved development activities. Changes in waste rock characterization, handling and segregation procedures, as well as inspection frequency, would be implemented following approval of 2AM-DOH1323 Amendment 1 (2016) and the revised WROMP (*WROMP II*) which accompanied that application.

Should you have any questions regarding the responses provided, or require any further information, please contact me at john.roberts@tmacresources.com.

Yours sincerely,

M. John Roberts
Vice President, Environmental Affairs
Hope Bay Project
(416) 628-0216

Encl.

ITEM	TOPIC	PARTY COMMENT	PARTY REQUEST	TMAC RESPONSE
EC July 31, 2015				
Issue #2 ML/ARD Potential, Geochemical Characterization				
E2	Classification	In reference to Section 2.5.1 Table 2: Geochemical Classification and Management Recommendations for Proposed Waste Management Units related to diabase classification, EC remains unclear as to why the samples under the TIC/AP method that are classified as "uncertain or PAG" are being disregarded. EC is concerned that the Proponent's response makes reference to two diabase samples that do not adequately address the TIC/AP classification findings.	Given the discrepancy between the classification results of the T¡C/AP and that of the NP/AP, is the Proponent suggesting that TIC/AP results are invalid?	TMAC's previous related technical response provided to the NWB on July 20, 2015 provided a detailed explanation as to why the diabase should be classified and managed as non-PAG material and why there is a discrepancy between the classifications based on NP/AP and TIC/AP. Two key points made in that discussion are that 1) silicate NP is the primary source of buffering in these rocks and therefore classifications based on TIC/AP ratios are not relevant for this rock type, and that 2) the types of silicates present in the diabase are capable of providing sufficient buffering at the low rates of sulphide oxidation that are occurring in the diabase. The discrepancy between NP/AP and TIC/AP is a reflection of mineralogy. Both sets of results are valid, but based on the findings, only the results of NP/AP are relevant.

Issue #4 Period of Waste Rock Deposition and Backfilling, Annual Inspections and Review				
E4	Inspection frequency	The Proponent concludes that inspection frequency for monitoring waste rock seepage is suitable, however EC maintains that annual inspections are inadequate given conditions are not static with seasonal fluctuations to consider.	EC recommends that the Proponent carry out more frequent inspections which are necessary to detect changes that may occur.	The material in question in the Party Request has not changed since the *WR&OMP* was approved in 2010. Accordingly, TMAC concludes that the inspection frequency remain suitable. TMAC requests that the NWB uphold the current approved inspection frequency for the purposes of this Request for Approval.
Issue #5 Period of Waste Rock Deposition and Backfilling, Annual Inspections and Review				
E5	Metal Leaching	The Proponent's response does not provide an explanation as to what is considered as an "environmentally significant level of metal leaching' occuring from the waste rock material.	EC recommends that the Proponent provide a clear and quantifiable definition of what is considered a "significant level".	The material in question in the Party Request has not changed since the *WR&OMP* was approved in 2010. Accordingly, TMAC concludes that the current understanding of metal leaching remains valid. For reference, the author defines an 'environmentally significant level of metal leaching' as a level that, when seepage collected Pollution Control Ponds (PCPs) is discharged to the Tailings Impoundment Area (TIA), as currently approved, would result in changes to the TIA pond water quality such discharges from the TIA would not be able to meet discharge criteria. The potential effects of the waste rock seepage on TIA water quality have been quantified in the water and load balances completed for the project to date.