

Comment, Recommendation, Correction to 2013 IARP	2016 IARP Reference
AANDC 2.2 Porewater Quality Monitoring.	Section 3.3.1 and 6.7 provides assurance that LMI has discussed the need for the monitoring cover performance with the engineers responsible for the annual geotechnical inspections. The TCA internal pond water quality data obtained in 2012 and 2015 is included in Section 7.1.2.
AANDC 2.6 Progressive Reclamation	Section 7.1.3 Progressive Reclamation Activities has been updated to reflect activities completed since 2012. Other management plans describe how progressive reclamation activities are to be conducted.
AANDC 3.1 Acid Generative Waste Rock	Section 2.4 has been subdivided, with Section 2.4.4 dealing specifically with waste rock. Areas where there is potentially ARD/ML rock is described in Section 6.2. The potential for ARD/ML is discussed and Section 6.4 describes the risk management approach.
AANDC 3.2 Asbestos	Results of asbestos surveys were reported in the January 21, 2015 LMI Response to Final Submissions regarding 2AM-LUP0914 Renewal and Amendment Application. The inventor of asbestos materials was communicated to contractors preparing quotes for demolition.
LMI Commitment #12(1a, 5b) 1a. Remove Care and Maintenance title as the plan applies to all phases. 5b. Future update to reflect that the IARP is a standalone document and not an appendix of the Care and Maintenance Plan.	Plan no longer an appendix to the Care and Maintenance Plan
LMI Commitment #12(2a, 3a, 3b) 2a. Future update to reflect LMI subsidiary of a different company, Mandalay Resources. 3a. Future update to reflect new parent company. 3b. Future update to reflect new contact information	Reference to Elgin Mining Inc. replaced by Mandalay Resources Corporation in Section 1 Introduction and current contact information provided
LMI Commitment #12(2b) Future update to reflect new licence term upon receipt.	Term of licence updated to reflect 2AM-LUP1520
LMI Commitment #12(4a) Correct section number heading. Heading of this section should be 1.3 not 2.1.	Typo corrected
LMI Commitment #12(4b) Future update to reflect new parent company's policy.	Elgin Mining Inc's Environmental and Sustainable Development Policy has been adopted by LMI

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LMI Commitment #12(5a) Future update to reflect the 2014 renewal process and outcomes.	General statement added to Section 1.4 to reflect the 2014 renewal process and outcomes.
LMI Commitment #12(6a) Future update to list years when there has been a discharge from the TCA (i.e. effluent discharge commences in 1985 and continued annually until 1997, subsequently there has been effluent discharge in 2000, 2002, 2005, 2009 and 2012).	Figure A added as illustration of TCA discharge events and volumes
LMI Commitment #12(6b) Future update to reflect significant site maintenance work and upgrades completed by Elgin Mining Inc on the mill, fuel tank systems and residential complex.	Brief reference to upgrades to mill, fuel tank systems and residential complex added to Section 2.1. Further details are provided in sections 3.4.
LMI Commitment #12(6c) Future update to reflect new parent company ownership.	A timeline showing ownership changes(Figure B) has been added to Section 2.1
LMI Commitment #12(7a) Future update to reflect renewed water licence number.	New water licence number reflected in Section 7.1. No revised land lease expiry dates to report.
LMI Commitment #12(8a) Add statement at end that reflects the 2014 review of the ARD/ML potential for the waste rock.	Section 2.4 has been subdivided, with Section 2.4.4 dealing specifically with waste rock. The potential for ARD/ML is discussed and Section 6.4 describes the risk management approach.
LMI Commitment #12(8b) Add surficial geology description. Include description of esker borrow source material and the background metals concentration in soils. Describe the history of windblown tailings and the path forward for the assessment of windblown tailings deposition.	Section 2.4.2 has been added to describe surficial geology. The description of the Finger Lakes Esker has been updated in Section 3.4 to provide grain size and metal concentrations. The results of the study to assess the presence of recent windblown tails is added to Section 2.4.2. The placement of esker cover to eliminate wind dispersal described.
LMI Commitment #12(9a) Future update to describe extreme daily temperature and precipitation (Canadian Climate Normals 1981 to 2010) and recent mean monthly temperatures as recorded by Environment Canada.	Climatic Normals 1981 to 2010 are provided in Section 2.2 along with recent site climatic data.
LMI Commitment #12(10a) Future update to include a description of how access to the underground workings has been secured during care and maintenance.	Section 3.1.2 now includes a description of how the portal and shaft are secured during care and maintenance.
LMI Commitment #12(10b) Future update to include a description of the soil cover on the paste backfilled openings in the East	Readers are directed Section 7.1.3 Progressive Reclamation Activities for a description of how the open stopes were backfilled and covered.

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Zone and part of the Central Zone crown pillars.	
LMI Commitment #12(10c) Future update to include a history of the decontamination of equipment and the removal of hazardous materials from the underground workings prior to the current care and maintenance stage.	The decontamination and removal of underground equipment is now described in Section 3.1.2.
LMI Commitment #12(10d) Future update to include a description of mine water discharge locations and quality.	A description of the mine water discharge locations has been added to Section 3.1.2. Mine water quality data will be gathered and reported prior to dewatering commencing.
LMI Commitment #12(11a) Update to clarify remaining area of tailings to be covered at final closure. There is currently an estimated 241,000 m ³ of tailings not covered by esker sand. This includes 155,000 m ² in Cell 5 and 86,000 m ² in Cell 3. These areas are either saturated for most of the year or underwater and are available to be used upon mine restart.	The current area of tailings yet to be covered has been consistently updated in sections 3.3.1, 6.5.3 and 7.1.3.
LMI Commitment #12(11b) Clarify that additional esker sand has been added to periphery cell dykes and dams. The locations of the unlined periphery cell dykes and dams will be identified in the updated plan.	Section 6.7.4 has been updated to clarify that additional esker material was added to internal unlined dams/dykes. All perimeter dams are lined as stated in the 5 th paragraph of Section 3.3.1
LMI Commitment #12(11c) Correct the statement on page 51 regarding covering and levelling of Cells 2 and 1. Update to note remaining area to be used during restart	Section 7.1.3 (was on page 51 of 2013 IARP), paragraphs 2, 6, 7, 8 and 10 have been corrected to list which cells and areas have been covered. The use of the remaining exposed tails in cells 3 and 5 has been added to Section 3.3.1.
LMI Commitment #12(11d) Future update to include a section summarizing the soil covers and dams geotechnical conditions.	
LMI Commitment #12(12a) Update to reflect 2015 water licence renewal and next iteration of the IARP.	Section 5.1 History has been updated to reflect changes to the plan since 2013.
LMI Commitment #12(13a) Future update to include description of how PAG rock associated with the tailings line infrastructure will be assessed and remediated.	The presence of potential ARD/ML rock (PAG) is presented in Section 6.2. The potential risk management approach for ARD/ML is described in Section 6.4.
LMI Commitment #12(14a) Update to clarify that the 2005 site assessment	A statement has been added that the site entered care and maintenance after the 2005 ESA in support of the

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remains valid given on-going care and maintenance status and renew commitment to carry out a site assessment prior to mine closure	assumption that there has been no net change to the volume of contaminated soil present. It is assumed that recent impacts are offset by natural attenuation and that site specific soil quality remediation objectives will allow for a significant reduction in what is considered contaminated under the generic federal guidelines.
LMI Commitment #12(14b) Future update to include plan for the consolidation and covering of petroleum hydrocarbon and metal contaminated soil (as per the plan described for PAG rock that cannot be placed underground in section 6.4).	The option to consolidate and cover the petroleum hydrocarbon impacted soil has been added to Section 6.2 and is described further in Section 6.4.
LMI Commitment #12(15a) Future update to include a description of how the presence of PAG rock will be assessed and remediated.	Section 6.4 describes how the presence of PAG rock will be assessed and remediated.
LMI Commitment #12(16a) Add concluding note to clarify that natural revegetation with scarification of surfaces to promote natural revegetation is the approach selected.	Revegetation is now described in Section 6.6. The use of scarification to promote natural revegetation has been emphasised in the final paragraph.
LMI Commitment #12(17a) Update to provide concordance to responses required.	This table represents the concordance table
LMI Commitment #12(18a, 19a) 18a. Update to reflect status of EEM scheduling following discussions with EC. 19a. Future update to include a section summarizing the Environmental Effects Monitoring Program.	The EEM program and results are summarized in Section 6.9.
LMI Commitment #12(19b) Future update to include a summary of internal pond water quality and seepage data.	The TCA internal pond water quality data obtained in 2012 and 2015 is included in Section 7.1.2.
LMI Commitment #12(20a, 20b) 20a. Update to reflect on going progressive reclamation to date including backhaul of hazardous waste carried out in 2014 and on available flights during care and maintenance. 20b. Update to reflect other activities, upgrades and progressive reclamation carried out by LMI as presented by LMI at the Technical Meeting	Section 7.1.3 Progressive Reclamation Activities has been updated to reflect activities completed since 2012.