

NWB File No: 2BB-BOS1727

October 16, 2020

Oliver Curran TMAC Resources Inc 181 University Avenue Suite 300, PO Box 33 Toronto, Ontario M5H 3M7

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Subject: Updated Interim Closure and Reclamation Plan; Water Licence 2BB-

BOS1727; Boston Advanced Exploration Project; TMAC Resources Inc.

Dear Mr. Curran,

The Nunavut Water Board (NWB or Board) has reviewed the Updated Interim Closure and Reclamation Plan for the Boston Advanced Exploration Project submitted to the Board on September 14, 2020 by TMAC Resources Inc., for the Boston Advanced Exploration Project, Water Licence 2BB-BOS1727.

Comments and recommendations are provided below pursuant to the NWB's mandated responsibilities under the Agreement between the Inuit of the Nunavut Settlement Area and Her Majesty the Queen in Right of Canada and the Nunavut Waters and Nunavut Surface Rights Tribunal Act.

## 1. Reclaiming Drill Holes

**Comment**: Table 2, Part I.1 states that: "b. Only waste rock excavated from the existing camp pad may be used for backfill, as per Water and Ore/Waste Rock Management Plan."

This statement leads to the follow up question, what is the metal leaching potential of waste rock excavated from the existing camp pad? And does not directly explain how metal leaching potential will be prevented.

**Recommendation**: For the Licensee to clearly state the measures that will be employed to prevent the fill of drill holes with material susceptible of leaching metals during reclamation activities, as



specified in Part I, Item 1b, of the Licence. If waste rock excavated from the existing camp pad has been shown to have low metal leaching potential, please clearly state so.

**Comment:** Section 3.12 states, "The drill holes will not be grouted, and the steel casing will not be backfilled."

This appears to be in contradiction to the statement presented in Table 2, Part I.1 (mentioned above), and Part I, Item 14, of the Licence, which requires the Licensee to "restore all drill holes and disturbed areas to natural conditions immediately upon completion of the drilling. The restoration of drill holes must include the removal of any drill casing materials and if having encountered artesian flow, the capping of holes with a permanent seal."

**Recommendation:** For the Licensee to clarify this discrepancy, and provide rational if drill holes will not be grouted, and the steel casing will not be backfilled.

## 2. Sedimentation Ponds

**Comment**: Section 3.4.3 states for Sedimentation Ponds 1 and 2 "the pond sediments will be tested for contaminants, and depending on the results will be hauled to Doris for underground disposal or covered in place by pushing the containment berm inwards." A similar statement is made for the Temporary pollution control pond.

**Recommendation**: For the Licensee to provide a brief explanation of what criteria this decision will be based on and how the end result will be determined. Will specific criteria limits be included in the Final Closure and Reclamation Plan (FCRP)?

## 3. Underground Portal

**Comment**: Section 3.5.1 states, "The underground portal will be closed in accordance with regulations."

**Recommendation**: For the Licensee to provide a reference to the regulations referred to.

## 4. Ash from Incinerator

**Comment**: Section 3.8.1 states "Ashes from the incinerator will be managed according to existing management plans."



**Recommendation:** For the Licensee to briefly state specifically how ashes from the incinerator will be managed, and avoid relying on alternate documents to provide explanation.

If you have any questions, please contact the undersigned at <u>derek.donald@nwb-oen.ca</u> or at (867) 360-6338 (ext. 32).

Sincerely,

Derek Donald Technical Advisor Nunavut Water Board

cc. Distribution List – Doris North