Inspector's C Observations 2	Comments related to site conditions as found in inspection reports or follow-up corre		2014	Issue addressed within time frame as directed.	. Issue partially addressed or unknown.	Issue unaddressed within time frame as directed.	Lupin 2017 Compliance Plan
NWNSRTA s.11 USE OF WATER WITHOUT A	2012	2013	141021 September Monthly Monitoring Rpt: indicates that DMS and WPC Resources were on	Requested clarification on several aspects of the 2014 activities as reported in the August	2016	Water use continued after expiry in 2014.	
WATER WITHOUT A LICENCE			site September 1-5 2014 to conduct work. This is after the licence expiry. 5 days, 8200L / 8.2 m3 water reported. WPC Resources led me to believe their work was only conducted in August; WPC's licence was not issued until November 2014 (and does not allow for a camp).	and September (2014) reports. No response was received until Oct 2015. Requested darification on several aspects of the 2014 activities as reported in the August and September (2014) reports. No response was received until Oct 2015.		Appears WPC operated in September 2014 without the benefit of either the	
PART D CONDITIONS R	RBC unit discharging untreated effluent to the lake.		not issued until November 2014 (and does not allow for a camp).	and September (2014) reports. No response was received until Oct 2015.		2BM-ULU or the 2BE-HRP licences. Assume that Licensee will manage RBC accordingly when next operational.	
RELATED TO WASTE	ASC unit discharging undeated enident to the lake.	Waste storage areas unmarked.		Waste and waste storage areas remain unidentified	Waste and waste storage areas remain unidentified	Assume that Licensee will manage KBC accordingly when next operational. Assumed that waste areas remain unmarked.	We will inquire and respond once our workers arrive on site in mid-July
DISPOSAL							2017. If the areas are unmarked, we are willing to mark the areas but we treat this task as a low priority for this season given our understanding that there is no requirement in the licence for the waste storage areas to be marked.
		conducted on their site. Empty barrels and haz waste remain (2012 sewage at airstrip). All hazardous materials are to be stored in secondary containment.		Several barrels of hazardous waste and contaminated soil at the mine storage pad. Waste (particularly potentially-hazardous waste) is not being stored according to the Waste Management Plan.	Waste [particularly potentially-hazardous waste) is not being stored according to the Waste Management Ran. Lomarked barred or inientifiliable waste (with staining underneath) remain to the east of the helipad and at the mine storage pad there remain several barrels of [potentially] hazardous waste and contaminated soil at the mine storage pad. Conditions remain unchanged in 2014.	Assumed waste is now in containment as per January 2017 correspondence.	
		Hazardous and human waste is to be removed from site particularly with site in care and maintenance.				Assumed unresolved as no backhaul has been reported despite explicit instructions to do so.	Backhaul of sewage waste and waste oil was reported in annual reports for the sites in 2013, 2014, 2015 and 2016. BCC will continue to backhaul at every opportunity.
		Geotech submitted to NWB November 2013. Recommends repain to berms and lines in 2014. Same repairs as recommended in 2013, but as they were not undertaken, the engineer included a date.	Geoted-submitted to NWB November 2011. Recommends repairs to berms and liners in 2014. Same repairs as recommended in 2013, but as they were not undertaken, the engineer included a date.	The line for the Retention Pront has slipped on the east side and much of the liner is exposed. As identified in the geotechnical inspection, it is not an immediate issue unless that pond is required for use.		Assumed unresolved as no significant maintenance work has been carried out.	BCC has no intention to use the pond, and therefore these recommend regain have not been printized for the 2DT season. If BCC plans if the pond change, the prioritization of this repair will be re-visited and it work completed prior to ruse. BCC does intend to repair the berms as p my comments below.
		130430 CMP states that BCC will carry out repairs to the tank farm berms in 2014.				Assumed unresolved as no significant maintenance work has been carried out.	BCC has filed a CRM report with their 2015 annual report. BCC is still awaiting comments/approval from the NWB. There will be a crew of approximately five workers on site starting in mid-July for two to three weeks to complete this task as per the glotchenical recommendations.
		130430 WMP indicates that the incinerator needs repairs and will be retrofitted or upgraded prior to the next exploration season.				Assumed unresolved as no significant work has been carried out, however, incinerator was used in recent years.	BCC still intends to retrofit or upgrade this equipment prior to its next exploration season, however BCC has not had an exploration program since this was included in the plan. Therefore, this repair work has not been prioritized for the 2017 season.
				receiving environment.	No mitigation measures have been put in place to address impacts of this site on the receiving environment: monitoring activities, implementation of the spill contingency plan, sediment control measures etc.	Partially addressed: spill boom deployed at fuel storage pad; silt curtains installed at select wash-outs along the road.	This work is planned to be continued/completed during the 2017 season. There will be a crew of approximately five workers on site starting in mid-July for two to three weeks to complete this task. This task has been given a high priority for completion.
				Wash-outs were noted along the road between the alistrip and camp.	Road wash-outs as described in the 2015 report have not been addressed. Culverts may require maintenance to restore flow of streams. No sediment control measures have been implemented since 2015 inspection.	Partially addressed: spill boom deployed at fuel storage pad; silt curtains installed at select wash-outs along the road.	This work is planned to be continued/completed during the 2017 season. There will be a crew of approximately five workers on site starting in mid-July for two to three weeks to complete this task. This task has been given a high priority for completion
					the water in the portal entrance was very high at the time of the inspection. Dischage lines were tout pricent the profits a summely to conduct a discharge, however, on amplies or notification of discharge had been provided to me at that time (or was ubsequently provided). The liner of the retention poor do support a one end. If the linerae intends to use this pond, which seems likely by the pump and house leading into it, the liner should be repaired.	Assumed unresolved as no work has been reported.	case has everifyered a riling to intriv our compensions. BCF had no plants to discharge from the retention pond and will comple regains to the liner prior to use. BCC currently has no plant to place it in use and therefore has not prioritized any repairs for the 2017 season. If there is time permitting in August 2017 while crews on our site, then th work will be completed.
PART E CONDITIONS RELATED TO SPILLS AND SPILL CONTINGENCY	Unsatisfactory storage of chemicals and hazardous materials.				As per the 2015 report: "Waste and waste storage areas remain unidentified and waste (particularly potentially-hazardosu waste) is not being stored according to the Waste Management Plan. Unmanded barries of unidentifiable useries (with staining undermeath) remain to the east of the helpod. and at the nine storage pad. There remain several burners of potentially hazardosu waste and contaminated onli at the mist lostage pad. "Confidention remain unchanged in 2016.	Hazardous materials: Assumed to be resolved per January 2017 update from BCC. Pending inspection.	
F	Red transfers occurring without drip tray.	Numerous spills noted on size. Spills on-size should be addressed at the time of the spill. Two leaking barrels were found (one outside of containment).	Lack of containment, monitoring and cleanup of spills. Fuel is migrating off the storage pad and down-slope.	The contamination spreading from the fuel storage pad/apron was raised as an issue in 2014 and has worsened since that time.	Aper inspection reports from 2013-2015, the hydrocarbon contamination spreading from the dist olarge pad/pions have been distended. For his type the reported A, GHS tack of the value perimeter of the stain was taken, and calculated the value affected area as 2288.2 ft2 (212.5mt). The effected area below the same surface is unknown at this point, but is likely the depth of the active layer. Shallow samples of the stance land were taken at 25 m and 25	Spill management: Unresolved - large spill from feel storage pad has not been reported, sampled, or remediated. Spill boom was installed around fuel storage pad to prevent further product from migrating down-slope.	his work is planned to be continued/completed during the 2017 season. The crew of the workers not the legisling in mid-slul yell complete this task and this task has been given a high priority for completion well before September 2017.
	Fuel and pumps placed within 30m of water.					Fuel storage and pumps: tbd when site is active	
PART I CONDITIONS RELATED TO ABANDONMENT, RESTORATION, TEMPORARY CLOSING		Drill sites are not adequately restored.		Drill holes have not been restored to pre-disturbance conditions.	As per the 2015 report: "Drift Police have not been restored to pre-disturbance conditions. Numerous drift Collects are visible in the velonity of the site. This was identified in the 2013 inspection and has not yet been addressed." A list of drift holes was submitted to the Inspector in Numerous 2015. In the accompanying report, the License estates" for far se we are aware all holes have been reclaimed.", despite photographs and reports that I have submitted from 2013 - 2015 that demonstrate otherwise.	Unresolved - list provided but request not satisfied: holes not reclaimed	Oue to BCC not being permitted to access the land until September 6, 2016 (and ending September 30, 2016) BCC was unable to complete task as planned as there was snow on the ground when they arrived is September. We have instructed the crew that is arriving on site in layly to ensure that all the drill casing are removed. The drill collars w remain in place in accordance with the water licence.
					As a result of lack of maintenance, site conditions are deteriorating. The large Quonset has tom open, exposing the materials and equipment stored therein.	Uncertain. No comment received.	Some repairs were started this season and further repairs are planned continue in 2017 in mid-July time permitting. As we are not aware of potential environmental impact from this issue, we have assigned this task a lower priority than addressing spills and maintenance work to improve containment and sediment control.
					The dack at the West Lake water intake facility is in disrepair, and at risk of becoming debris in the lake. It should be removed before the situation worsens.		This work is planned to be continued/completed during the 2017 season, time permitting.
PART J CONDITIONS RELATED TO MONITORING		Monitoring of the site is to continue as per licence requirements under Part I, unless documentation can be provided to the inspector showing dispensation from the Board to suspend monitoring at the site. Monthly reports have not been submitted in the required timelines (eg-April and May received July 30) and do not speak to the actual required monitoring.	Lack of monitoring: inadequate reporting in monthly reports.	No monitoring reports have been filed on the NWB FTP site since March 2015. No 2014 monitoring results were submitted with the annual report.	No results were submitted for monitoring of ULU-8, which should be sampled twice annually during open water period.	Assumed non-compliant due to lack of reporting and BCC's lack of presence on- site.	BCC will complete monitoring during the 2017 season as required. I w follow up with MPC in regards to the reports.
OTHER 2	2012 Annual report does not address Part B Item 8 (g); actions to address concerns detailed in the Inspection reports		Annual report deficient.			TBD for 2016	Filed
REPORTING /ADMIN	Inspection reports. Operating with outdated plans.					Resolved]
			No notification submitted under Part H Item 1 that site would be activated. No mention was made to inspector during July visit that site would be active in August.			Resolved	
				QA/QC plan within 60 days following licence issuance with a confirmatory letter from an accredited laboratory		Received]
							_
Inspector's S instructions 2	Specific instructions given to BCC in inspection reports, and whether those instruction 2012	ns were carried out as directed:	2014	Issue addressed within time frame as directed 2015	Issue partially addressed or unknown.	Issue unaddressed within time frame as directed 2017 - Summary and Status	
Sewage/Human waste	Effluent immediately diverted to lined mine containment sump until discharge criteria are met or alternative disposal for human waste is implemented.	Sewage at the airstrip is to be backhauled in 2013, and as much hazardous waste as possible removed from site.	544		Repair to portal containment pond, in case it is required in the future	Assumed compliant: Licensee has employed other methods to dispose of sewage when the site is minimally staffed.	
Hazardous Waste	All oils & haz waste to be collected and placed in containment by 31 July.	Hazardous waste is to be backhauled.	All new hazardous waste is to be backhauled in the year it is created to prevent the accumulation of waste to unmanageable levels.			Non-compliant: no backhaul has been reported. Licence conditions indicate that hazardous waste is to be backhauled.	Please see comment above in regards to hazardous waste backhauled i previous years as reported in our annual reports

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			All hazardous materials at site to be placed within secondary containment. Open barrels to be covered. By September 30 2014.	All hazardous (and unknown) waste is to be moved into SOUND secondary containment that meets the definition of 'secondary containment' in the current licence 2BM-ULU1520. This is to be completed by June 30, 2016.	All hazardous (and unknown) waste is to be moved into SOUND secondary containment that meets the definition of 'secondary containment' in the current licence 2BM-ULU1520. *	Assumed compliant, if all waste is now in containment as per January 2017 correspondence. Pending inspection.	
Waste Storage and Handling		Waste storage areas are to be clearly identified.				Assumed non-compliant: that waste areas remain unmarked.	I need to check with Discovery and WPC but if this is not completed it BCC will complete this task in 2017. As set out above, it will be treate with a lower priority than the items identified as high priority in your email of September 7, 2016.
		Waste is to be clearly identified.				Haknowa	I need to check with Discovery and WPC but if this is not completed to BCC will complete this task in 2017, time permitting.
Fuel storage	Fuel pump set >30 m back from water and photos by 24 July.	All fuel is to be stored in secondary containment, and covered to prevent water accumulation in the containment during periods of inactivity.	All hazardous materials at site to be placed within secondary containment. Open barrels to be covered. By September 30 2014.	All barrels of fuel are to be moved into SOUND secondary containment that meets the definition of 'secondary containment' in the current licence 2BM-ULU1520. This is to be completed by June 30, 2016.	All barrels of fuel are to be moved into SOUND secondary containment that meets the definition of 'secondary containment' in the current licence 2BM-ULU1520. *	Assumed compliant: that all fuel and haz mat are now in secondary containment per January 2017 update from BCC. Pending inspection.	
Fuel handling	Fuel transfers to occur over drip travs	MMG berm is to be repaired or replaced, or MMG fuel removed from site.				Resolved. Assumed resolved	-
SPILLS	ruer densiers to occur over drip days.	Spill at the airstrip is to be cleaned up as per Spill Contingency Plan.	Spills around site are to be addressed as per Spill Plan. Contaminated soil is to be backhauled. By September 30 2014.	Spills are to be reported and addressed according to the approved Spill Contingency Plan.	Spills are to be reported and addressed according to the approved Spill Contingency Plan.	Non-compliant. BCC has failed to appropriately manage the fuel leaking from	This work has been given a high-priority for the five worker crew arriv on site in mid-July. We expect that the spill will be addressed in accordance with our Spill Contingeny Plan before September 2017.
				a) stop the flow of hydrocarbons from the fuel storage pad	a) stop the flow of hydrocarbons from the fuel storage pad	the storage pad since 2014. Partially addressed: splll boom deployed at fuel storage pad and old barrels/waste were removed. Fuel remains on the pad, despite the knowledge that it is not containing splitled rule.	Due to BCC not being permitted to access to the land until September 2016 (and ending September 30, 2018) BCC was unable to complete it with the september of the september of the september of the serviced is September. This work is planned to be continued/complete during mid-July to early August 2017 and will be treated with high priority.
				b) prevent any further migration of hydrocarbons down-slope from the fue storage pad c) remediate the affected area	b) prevent any further migration of hydrocarbons down-slope from the fuel storage pad c) remediate the affected area	Non-compliant. BCC has failed to appropriately manage the fuel leaking from the storage pad and instructions of the inspector since 2014.	Due to BCC not being permitted to access to the land until September 2016 (and ending September 20, 2016) (Ex var unable to complete task as planned this year as there was snow on the ground when the task as planned this year as there was snow on the ground when the tarried in September. This work is planned to be continued/orbit during mid-July to early August 2017 and will be treated with high oriently. Due to BCC not being permitted to access to the land until September
				c) remediate the affected area	c) remediate the affected area	Non-compliant. BCC has failed to appropriately manage the fuel leaking from the storage pad and instructions of the inspector since 2014.	soler to see, not using permitted of access to unit and other september 2016 (and ending September 20, 2016) ECC was unable to complete it task as planned this year as there was snow on the ground when the arrived in September. This work is planned to be continued/complete during mid-July to early August 2017 and will be treated with high priority.
O+M	Uners and berms to be assessed in next geotechnical inspection.					Assumed incomplete: Geordech was submitted 211217 to NWB. BCC was recommended to cover exposed liners and repair damaged liners. Cover letter indicates that a compliance plan would be developed and plan discussed with the inspector, but no actual work was proposed to implement recommendations. No compliance plan was received. 2013 geotech ecommended repairs to berms and liners in 2014. To my knowledge, no repairs / significant sits maintenance has been undertaken.	Please see 2016 annual report and 2016 Geotechnical Inspection reports of the Control of the Con
Monitoring		The Monitoring program is to be implemented immediately, or documentation provided to the inspector by July 31, 2013 that demonstrates authorization of the Board to discontinue Monitoring.	Monthly monitoring during snow-free season is to be implemented (including freshet). This includes monitoring of waste + fuel as well as implementing the monitoring program as per the licence.			Non-compliant. Monitoring was not undertaken as required for the last several years.	BCC intents to carry out this work in 2017 as required.
				Establishment (and regular maintenance) of sediment control measures to prevent further sediment loading of streams that have been affected by road deterioration. These measures are to be put in place at freshet 2016.	Establishment (and regular maintenance) of sediment control measures to prevent further sediment loading of streams that have been affected by road deterioration. These measures are to be put in place at freshet (now 2017).	Partially addressed. Silt curtains installed and road maintenance undertaken at two wash-outs along the road. Regular inspections and maintenance are required.	Some repairs were started this season and further repairs are planner continue next season as long as BCC is able to obtain permission from KIA to access site
					Conduct a visual assessment of all culverts on site, and provide a report including: GPS coordinates of each, culvert condition, whether flow is possible or obstructed in any way. This report shall be submitted to the inspector by September 30, 2017.	To be undertaken 2017.	BCC intents to carry out this work in 2017 as long as they are able to obtain permission to access the site from the KIA.
Progressive reclamation		A timeline to address progressive reclamation of drill sites is to be prepared.		A complete list of drill holes (with GPS coordinates) associated with this project (drilled by past and current operators) is to be provided to the inspector. Please identify any holes that are known to be reclaimed according to the terms of the licence. This list is to be provided by January 31, 2016.	conduct a visual inventory of all the known drill holes, as per the list provided to the inspector in 2015 (approximately 856 holes). Each drill hole shall be inspected for compliance with Part I items 13 and 15, and any other relevant conditions of the licence. The Licensee shall reclaim each hole that does not satisfy these conditions to a pre-disturbed state, including contouring, cutting of drill casings or collars flush with the ground, and any other remediation required (pills, debris etc). The Licensee shall complete this work over the next one (1) to three (3) years, with a minimum of one third to be completed each year, beginning in 2017. A table shall be submitted to the inspector by June 0.1 of each year, beginning in 2017, a table shall be submitted to the inspector by June 0.1 of each year, beginning in 2017, a table shall be submitted to the inspector by June 0.1 of each year, beginning in 2017, a table shall be submitted to the inspector by June 0.1 of each year, beginning in 2017, a table shall be submitted to the inspector by June 0.1 of each year, beginning in 2017, a table shall be submitted to the inspector by June 0.1 of each year, beginning in 2017, a table shall be submitted to the inspector by June 0.1 of each year, beginning in 2017, a table shall be submitted to the inspector by June 0.1 of each year, beginning in 2017, a table shall be submitted to the inspector by June 0.1 of each year, beginning in 2017, a table shall be submitted to the inspector by June 0.1 of each year, beginning in 2017, a table shall be submitted to the inspector by June 0.1 of each year, beginning in 2017, a table shall be submitted to the inspector by June 0.1 of each year, beginning in 2017, a table shall be submitted to the inspector by June 0.1 of each year, beginning in 2017, a table shall be submitted to the inspector by June 0.1 of each year, beginning in 2017, a table shall be submitted to the inspector by June 0.1 of each year, beginning in 2017, a table shall be submitted to the inspector by June 0.1	To be undertaken 2017.	out to EC cnot being permitted to access to the land unit Septembe. 20.018 (and ending September 30, 2031) EC securities to complete task as planned this year as there was snow on the ground when the ranked in September 20.025 (and EC) and the securities of September 20.005 and the securities of September 20.005 as they are able to Obtain permission to access the size from the ELA.
					Removal of the dock and any structures that may become waste in the water	To be undertaken 2017.	BCC intents to carry out this work in 2017 as long as they are able to obtain permission to access the site from the KIA.
Plans / Reporting	Current CM plan, Waste Mgmt Plan to Inspector by 24 July.			revised QA/QC plan and letter as required by the licence are to be submitted to the Board by November 30, 2015.		Compliant.	
Inspection Follow-Up		Required actions are to be completed and a report submitted to the Inspector by September 30 2013. Report received, but items not addressed to the satisfaction of the Inspector.	A report with the details of required actions above is to be submitted to the inspector by October 31, 2014. Received December 9 at the request of the inspector.	Complance work to be completed by July 31, 2016 and a confirmatory report submitted to the inspector by August 15, 2016. ECC notified the inspector on September 6 that they had not had access to site, and now had a temporary LUP. BCC did not attend site until September 2016, and then only partially completed the work.	Provide confirmation in writing by December 15, 2016, of those activities carried out in 2016 (a list of priorities was sent to BCC on September 9, 2016). Received January 19, 2017. Work partially completed. Response was only received afte prompting BCC. The rest of the activities are to be carried out in 2017.	I have discussed the outstanding compliance issues and environmental hazards at the fulls after with Winter at the kittls, and will be working with her to ensure that, even if tenure issues remain unresolved in 2017, there will be a mechanism to ensure that BCC/WPC can carry out their obligations under this water licence. The fact remains that these issues should have been addressed prior to 2016 as they were identified in several past inspection reports. As with telssues at Lupin, vill lissue a Direction if/when necessary but would hope that the project can be brought into compliance without entering the enforcement realin.	BCC thanks you for reaching out to Wyster at the IAD and Iook flows, to having a phone in Determent there for it to ensure we have act to site to be able to address your concerns and make sure we are compliant. ECC has not desire to be incompliant and we look forestave working with you this season to resolve all ,or as many as possible, of your concerns.
				Response to my questions of January 16 and 19, 2015, by November 30, 2015. Response received October 30 - 9 months after request.	Review the 2013-2015 inspection reports, and create a work plan for 2017 that will address all of the outstanding work, and including the items identified below. This work plan is to be submitted to the inspector for review and approval by January 31, 2017. Failure to address these deficiencies according to the approved plan will result in enforcement action. No workplan has been received as of February 9, 2017.	Here is a summary of the outstanding work and compliance issues at site. Workplan to be sumitted to the Inspector for review by February 28, 2017.	As discussed, due to some unexpected urgent personal matters, I was unable to meet the deadline of February 28, 2017 and Indoor that receiving the work plan now it suitable to you. My apologizes.