



May 30, 2018

Nunavut Impact Review Board (NIRB)

29 Mitik Street, P.O. Box 1360
Cambridge Bay, NU
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Attention: Mia Otokiak, Junior Technical Advisor, NIRB
Via email: motokiak@nirb.ca

Re: NIRB File 17EN029; Beverly and Qamanirjuaq Caribou Management Board Comments

Dear Ms. Otokiak:

I am writing on behalf of North Country Gold Corp. ("NCGC" or "the company"), a wholly owned subsidiary of Auryn Resources Inc., regarding the Gibson-MacQuoid Project and related NIRB screening (file # 17EN029). Thank you for the opportunity to review and respond to the comments received from the Beverly and Qamanirjuaq Caribou Management Board (BQCMB).

We understand the interest raised by BQCMB and are committed to working constructively and sustainably in a manner that respects those interests. The proposed exploration activities at Gibson MacQuoid are the most early-stage, reconnaissance level activities in the mineral exploration industry and consist of basic prospecting and general regional surveys. These proposed activities are very low impact, temporary and intended to assess geological potential to determine if any areas warrant further examinations, or not.

The company recognizes that its mineral exploration activities are partly located in caribou calving and post calving ranges. Based on past community discussions and feedback from the Kivalliq Inuit Association (KivIA), we have proactively incorporated numerous accommodations to plans and activities in order to address potential impacts to caribou. In addition to meeting all environmental regulations and permit conditions, these accommodations include:

- Planning the majority of exploration activities to occur outside of caribou calving and post-calving ranges,
- Re-scheduling activities in caribou calving and post-calving ranges to occur after August 1, which exceeds and is more conservative than the timing windows proposed by the Government of Nunavut (June 9 – July 3) and the Keewatin Land Use Plan timing window (May 15 – July 15),
- Reducing exploration activities in caribou calving ranges to only the most innocuous regional surveys (soil sampling by foot and drone imagery) which are very low risk and low impact,
- Utilizing adaptive management including adoption of the Mobile Caribou Conservation Measures produced by the KivIA for the entire project area which includes procedures such as:
 - If collar data or observations indicate that there are one (1) or more collared caribou or twenty-five (25) or more caribou observed within the thirty (30) km early warning zone from the work areas, then monitoring within a five (5) km buffer zone shall be conducted every second day (e.g., height of land surveys, road surveys, remote camera surveys).
 - If monitoring indicates that there are twenty-five (25) or more caribou within five (5) km of the work areas, then the Lessee shall monitor within a five (5) km buffer zone around the work

Auryn Resources Inc.

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areas on a daily basis, and shall immediately suspend work that has the potential to disturb caribou, including suspension of drill operations, blasting activities and non-essential ground movements and aircraft traffic below 300 m above ground level (except as necessary for emergency purposes), suspension of all ground operations and camp closure, until caribou numbers are below the threshold within the buffer zone.

- Undertaking daily wildlife monitoring, wildlife observation logs and annual wildlife monitoring reporting,
- Offering and remaining open to hiring of approved Inuit wildlife monitors during our recent community consultations,
- Utilizing a temporary camp, located outside of caribou calving ranges, to reduce potential impacts to wildlife associated with helicopter flights,
- Minimizing the duration of activities in caribou calving ranges to 8 weeks or less,
- Full reclamation so that any minor disturbances are restored to original conditions so there is no impact to habitat.

Additionally, NCGC upholds all best management practices, commitments and permit conditions in the necessary permits to support this work, including Inuit Land Use License KVL117B04 and the requirements for annual review and approval of workplans. For further information about the company's policies and procedures in relation to environmentally responsible mineral exploration we point you to our Corporate Sustainability Policy and Regulatory Compliance Policy (<https://www.auryresources.com/>).

We have attached a comment tracking table that provides responses specifically linked to the comments from BQCMB. The company is committed to additional ongoing consultations with communities and interest groups. We would be pleased to meet with BQCMB to discuss the company's low impact activities, approach to environmentally responsible exploration and to share monitoring data, if interested.

As you can appreciate, exploration activities in Nunavut are extremely time sensitive involving short operational windows for our employees and contractors to conduct our work safely and efficiently. This results in mineral exploration in Nunavut being high cost, high risk and difficult to raise financing for. Aury is proud that the company and its predecessors have invested more than \$100 million in exploration activities and related employment/contracting within Nunavut over the years. We hope the clarifications provided in this letter and upcoming and future discussions will help address any concerns regarding our proposed low impact exploration works, and support our interest to continue to attract investment to this region.

Sincerely,



Bryan Atkinson, B.Sc., P.Geol
Exploration Manager



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cc: Earl Evans, BQCMB Chairperson

Encl: Comment Tracking Table