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October 9, 2019

Keith Morrison
Technical Advisor II
Nunavut Impact Review Board
P.O. Box 1360
Cambridge Bay, NU, X0B 0C0

Re: TMAC's Response to NIRB's 2019 August Site Visit Report

Dear Mr. Morrison,

This correspondence is being provided to the Nunavut Impact Review Board (NIRB) on behalf of TMAC Resources Inc. (TMAC) in response to recommendations made in the NIRB's *2019 August Site Visit Report* issued to TMAC on September 23, 2019.

TMAC's response to the NIRB recommendations can be found in Attachment A of this submission.

Should you have any further questions please feel free to contact me at oliver.curran@tmacresources.com.

Sincerely,

A handwritten signature in blue ink, appearing to read "Oliver Curran", with a small flourish at the end.

Oliver Curran
Vice-President, Environmental Affairs TMAC Resources Inc.

cc:
Ashely Mathai (TMAC)
Sarah Warnock (TMAC)
Kyle Conway (TMAC)
Adam Grzegorzczuk (TMAC)

Attachment A: TMAC Response to the NIRB's 2019 August Site Visit Report

TMAC's Response to the NIRB's 2019 August Site Visit Report

Recommendation 1

During the NIRB's August 2019 site visit, staff did not notice excessive dust generation, and TMAC's 2018 Annual Report indicated dust measurements were below designed thresholds. However, as noted above, weather conditions played a role in natural dust suppression. Moreover, when the Doris-Madrid road begins carrying a larger traffic volume, especially in dry conditions, dust generation can be reasonably expected to increase based on experience with other projects involving all-weather road transport, and as such current monitoring and dust suppression may be insufficient.

It is recommended that TMAC evaluate, in light of the experience of other mining projects involving road transportation, whether the existing dust monitoring and mitigation plans will be sufficient given the high likelihood of a significant increase in dust generation by road traffic. It is further recommended that TMAC indicate how it will implement increased monitoring and mitigation in the event such an increase in dust generation is observed.

TMAC Response

TMAC appreciates the NIRB's recommendation in relation to dust monitoring and mitigation, and although excessive dust generation has not been observed related to the Hope Bay Project, TMAC takes proactive steps to monitor and minimize dust generation as prescribed by TMAC's air quality monitoring and mitigation program. TMAC's air quality monitoring and mitigation program is outlined in the existing Hope Bay Project Air Quality Management Plan (AQMP) (TMAC 2019). The AQMP was most recently updated in April 2019 to reflect the updated and increased monitoring and mitigation TMAC performs related to Air Quality. This includes implementation of Continuous Emission Monitoring Systems at Madrid. Dustfall monitoring at Madrid is described in Module B of the AQMP, monitoring along the Doris-Windy All Weather Road (Stations M-DF06, M-DF07, M-DF08 and M-DF09) will be operated for a period of one-year during peak construction and for a minimum of one-year period during a time in operations that designates lead up time to and during peak operations.

The main objective of the AQMP is to ensure that measures are implemented to manage and reduce air emissions resulting from activities at Hope Bay Project sites. As described in Section 5 of the AQMP, in the event that an evaluation of the data generated by monitoring programs outlined in Section 3, including results from Continuous Emission Monitoring Systems, indicate an exceedance of dust fall guidelines or predictions, TMAC will investigate to determine the possible source(s) and potential impacts. A review of the implementation of mitigation and management measures outlined in Section 2.2 of the AQMP will be conducted as a part of this investigation. Based on the investigation, TMAC will identify and implement specific adaptive management measures to suppress the most likely sources of dust emissions. Results of which are reported to the Nunavut Impact Review Board bi-annually.

It should be noted that in TMAC's recent Winter Atmospheric Compliance Monitoring Program Report submitted to the NIRB on September 2019, measured dust fall levels were principally at or below established thresholds and predictions.