

PERMIT M-96-07 AMENDMENT

UNDER THE *ENVIRONMENTAL ASSESSMENT ACT*

COMMENT TRACKING

MOUNT POLLEY MINE

CONDITION 3: MILLING RATE

PREPARED FOR

THE ENVIRONMENTAL ASSESSMENT OFFICE

PREPARED BY

MOUNT POLLEY MINING CORPORATION

Revision Summary

Revision No.	Date	Description
B	21 April 2016	Draft tracking table for EAO review and comment
0	25 April 2016	Comment responses for EAO review
1	27 April 2016	Revised response to IH-001

Comment Summary List

Group (Author)	Document Type Name	Document Date
Ministry of Forest, Lands and Natural Resource Operations (David Weir)	E-mail <i>RE: Mt Polley EAC Amendment Application: comments requested by April 21</i>	14 April 2016
Interior Health (Christina Yamada)	E-mail <i>RE: Mt Polley EAC amendment application comment timeline</i>	19 April 2016
Ministry of Energy and Mines (Tania Demchuk)	Email <i>MEM comments on EA Application: amendment to certificate condition 3</i>	20 April 2016
Ministry of Environment (Hubert Bunce)	Email <i>MOE Comments re Mt Polley EA Certificate amendment</i>	20 April 2016
Williams Lake Indian Band & Xat'sull First Nation (Aaron Higginbottom & Georgia Bock)	Email <i>APPLICATION TO AMEND ENVIRONMENTAL ASSESSMENT CERTIFICATE M96-07: CONDITIONS</i>	21 April 2016
Environmental Assessment Office (Fern Stockman)	Email <i>RE: MPMC-EAC Amendment Responses to Comments</i>	26 April 2016

Tracking #	Source	Comment Date	Section/ Page	Comment	Response
FLNRO-001	FLNRO	14 April 2016	3.2.4	<p>The section of Bootjack lake is misleading. The mine is obligated to inspect and maintain the Bootjack Lake dam and should be the licence holder for the water licence as they will be required to remove the dam when the mine is reclaimed. The reason for requiring the dam was because Bootjack creek crosses through the mine site and they were supposed to remove the old dam and before building the new one so that when the mine is deactivated flow to Bootjack will be restored. Bootjack lake has two outlets one going to Moorehead and one to Bootjack creek which I believe was a tributary to Hazeltine creek rather than Edney but they are all close to each other.</p> <p>At the time it was expected that the province might choose to take over the Bootjack lake dam at some point so the province holds the licence with the Mine being responsible through DFO. The province is no longer interested in assuming responsibility for Bootjack lake dam and the licences should now be transferred to the Mine so that clear accountability can be established for dam safety. I cannot recommend issuance of any authorizations until the licences have been transferred. If the dam fails the failure track will be into the mine permit area.</p>	<p>The Bootjack Lake dam was constructed by MPMC in Fall 1996 as a condition of the Habitat Compensation Agreement (HCA) between the Department of Fisheries & Oceans and MPMC signed September 25, 1996 to compensate for the loss of productive capacity of local fish habitat in Edney Creek tributary 1 caused by the construction of the Tailings Storage Facility. The modern Bootjack Lake dam replaces an old plug dam built by turn-of-the-century miners to force water into Morehead Lake to the Bullion Pit area for hydraulic mining purposes. Had the old plug dam failed, the lake would have drained into Hazeltine Creek. As such, the modern dam protects the fishery resource of Bootjack Lake into the future.</p> <p>MPMC agreed in the HCA to ‘<i>maintain the dam until abandonment of the mine or until relieved of its responsibility by Her Majesty, whichever comes first</i>’. The dam is inspected annually by MPMC and is included in the Annual Reclamation Report. MPMC reclamation and closure plans do not include removal of the dam. The structure’s construction is unrelated to milling rate.</p>
IH-001	Interior Health	19 April 2016	All	<p>I have completed a cursory review of the document submitted by MPMC and it raised a number of questions related to Air Quality, Water Quality and Human Health. The Human Health assumptions place significant reliance on the draft HHERA Problem Formulation. This document is still under review, has unresolved questions and may not support the assumptions made.</p> <p>Interior Health’ Infrastructure Program participates in and supports industrial approval processes if and as we are able. In the future we need an appropriate amount of time to complete a meaningful review. We will not be submitting comments on this application.</p>	Comment acknowledged.
IH-001a	EAO	26 April 2016	All	Please indicate under what permit/ process the draft HHERA is being discussed and will be finalized and if IHA comments/ concerns will be addressed through that process.	The Detailed Site Investigation and draft Risk Assessment Problem Formulation (the initial step of the HHERA) have been submitted to the MOE. The full HHERA is due to MOE Nov 30, 2016. The DSI and HHERA are being reviewed through the Contaminated Site Regulation process administered through the Land Remediation Section of the MOE. We expect comments back from the Land Remediation Section, and other stakeholders, on the DSI and Draft Problem Formulation at the end of April 2016. Once those comments are received we will make a plan to address them.
MEM-001	MEM	20 April 2016	All	<p>MEM has reviewed the document “Mount Polley Mining Corporation Application to Amend Environmental Assessment Certificate M96-07: Conditions 3”, submitted by Mount Polley Mining Corporation (MPMC), dated April 13, 2016.</p> <p>MEM understands that MPMC is requesting an amendment to EA certificate condition 3, which specifies that milling may not substantially exceed 13,700 tonnes per day. The requested change is to reflect current and proposed operations at the mine. If granted, the amendment will allow for milling of up to 22,000 tonnes per day or not substantially in excess of 8.2 million tonnes per year. MEM notes that the Mines Act permit and subsequent amendments held by Mount Polley Mining Corporation approve milling rates of approximately 18,000-20,000 tonnes per day.</p> <p>The application summarizes a number of valued components (VCs) identified as having a potential linkage to milling rate. MEM does not have questions or comments related to the information presented at this time, however we note that some of these VCs are expected to be of interest during anticipated future discussions with the EAO as they relate to material alterations to the originally certified project.</p>	Comment acknowledged.
MOE-001	MOE	20 April 2016	All	<p>From a Ministry of Environment perspective the increase in the milling production rate amendment from 13700 tonnes/d (equivalent to 5 million t/yr) to an amended production rate of up to 8.2 million t/yr does not appreciably change the footprint of the mine site or offsite discharge that is currently authorized. While MoE may have comments regarding expected further material alterations to the certificate we do not have any specific concerns relative to the applied for change to the mill production rate at this time.</p> <p>Considering that a decision on the current application to increase the tailings discharge cannot occur in advance</p>	Comment acknowledged.

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				of a conclusion on the current EA certificate amendment no decision (amendment) of the EMA permit 11678 will be made if the milling rate is significantly increased above 13, 700 t/d	
WLIB-XFN-001	WLIB & XFN	21 April 2016	All	<p>The Williams Lake Indian Band and Xat'sull First Nation are not planning to submit further comment on the application to amend EA Certificate M96-07.</p> <p>WLIB and XFN have been working closely with Mt Polley Mines representatives as well as the Ministry of Environment and Ministry of Energy and Mines on the MPMC Restart and EMA applications.</p> <p>WLIB and XFN have discussed with our teams and are currently in support of this application as it currently stands.</p> <p>Any questions or concerns please do not hesitate to contact either of the two communities Natural Resource Departments for further clarification or comment.</p>	Comment acknowledged.