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December 20, 2023

Jacqueline Ho (*via email only*)
Regulatory Specialist
Mackenzie Valley Land and Water Board
P.O. Box 2130
7th Floor – 4922 48th Street
Yellowknife, NT X1A 2P6

Dear Ms. Ho,

Reference: 2023 Annual Geotechnical Inspection – Water License MV2017L2-0007

Pursuant to Water License MV2017L2-0007, Teck Metals Ltd. respectfully submits the following for the closed Pine Point Tailings Impoundment Area:

- Pine Point Mine Tailings Impoundment Area 2023 Annual Geotechnical Inspection, dated December 18, 2023 prepared by Klohn Crippen Berger

Per License Condition F.7 Part B, our implementation plan is listed below as the Summary of Deficiencies and Recommendations table, with recommendations and suggested closure timelines from the Engineer of Record. We have included recently closed recommendations from previous years along with in progress ones. The priority definitions are explained below the table.

Table 1: Summary of Deficiencies and Recommendations

Structure	ID No.	Deficiency or Non Conformance	Applicable Regulation or OMS Manual Reference	Recommended Action	Priority	Recommended Deadline (Status)
Previous AFPR Recommendations Ongoing						
TIA Instrumentation	2019-02	Instrumentation installed in 2018 requires integration into OMS Manual procedures.	CI. 4.2 and 4.3 of OMS Manual	Establish procedures for frequency of data acquisition and review. Establish baseline readings and levels for alert and emergency response, with corresponding update of OMS Manual.	4	<i>Partially Completed</i> Frequency of data acquisition and review and baseline readings completed. <i>Remaining Action:</i> Q1 2024 Confirm notification and trigger levels for instrumentation and update the OMS.
TIA	2020-03	Freeboard limits require update for 2019 storage curve, 2020 climate assessment, review of design criteria, and evaluation of spillway.	CI. 2.7.3.2.3 of OMS Manual	Review flood storage capacity, water handling practices, determine capacity of spillway and update freeboard limits. Incorporate these changes in the OMS Manual.	3	<i>Completed</i>
TIA Instrumentation	2021-01	<i>VWP anomalous readings. PP-VWP-2018-02A PP-VWP-2018-02B PP-VWP-2018-05 PP-VWP-2018-08 PP-VWP-2018-09 PP-VWP-2020-11A</i>	<i>None</i>	<i>Troubleshoot VWP calibration / data acquisition and data reduction. Assess the importance of these instruments for TIA surveillance and repair, replace or decommission faulty or damaged instruments where necessary.</i>	4	<i>Completed</i>

Structure	ID No.	Deficiency or Non Conformance	Applicable Regulation or OMS Manual Reference	Recommended Action	Priority	Recommended Deadline (Status)
TIA	2021-03	Previous stability assessments were based on limited site characterization data.	None	Update stability assessments and review filter compatibility for the dykes based on the 2018 and 2020 site investigation data.	4	Stability modeling: Q2 2024 Internal erosion assessment: Q2 2024
Main Pond Spillway, Polishing Pond Spillway	2021-05	<i>The spillways are vulnerable to blockage by woody debris.</i>	<i>None</i>	<i>Develop a plan to manage debris in the pond and add to the OMS Manual.</i>	3	<i>Completed</i>
TIA Instrumentation	2021-06	<i>The remote camera system for monitoring the staff gauge is vulnerable to water damage during high pond levels.</i>	<i>None</i>	<i>Relocate the remote camera system to above the high-water level of the Main Pond.</i>	4	<i>Completed</i>
North Dyke	2022-01	<i>No documentation of the riprap placed during the reporting period.</i>	<i>Section 5.7 of OMS Manual</i>	<i>Prepare a record document of the North Dyke riprap placement.</i>	4	<i>Completed</i>
Main Pond	2022-02	<i>Updated TARP (2022) is not included in the current OMS Manual.</i>	<i>Cl. 2.7.3.2.3 of OMS Manual</i>	<i>Incorporate the updated TARP into the OMS Manual.</i>	3	<i>Completed</i>
TIA Instrumentation	2022-03	<i>VWP datalogger reliability.</i>	<i>Cl. 4.2 and 4.3 of OMS Manual</i>	<i>Include a review of the status of the VWP dataloggers prior to freshet and replace batteries, as needed. Include this as regular maintenance in the OMS Manual.</i>	4	<i>Completed</i>
South Dyke	2022-04	The culvert at the southwest corner of the TIA inspected during the site visit may not have	None	Evaluate the potential for toe erosion during flood routing at the southwest access road culvert.	4	Q1 2024

Structure	ID No.	Deficiency or Non Conformance	Applicable Regulation or OMS Manual Reference	Recommended Action	Priority	Recommended Deadline (Status)
		been accounted for in the flood routing assessment.				
2023 AFPR Recommendations						
North Dyke	2023-01	None	None	Include in the OMS Manual that the EoR performs an inspection of the North Dyke upstream slope at a low water level every three years.	4	Q4 2024

Priority 1: A high probability or actual TIA safety issue considered immediately dangerous to life, health or the environment, or a significant risk of regulatory enforcement.

Priority 2: If not corrected could likely result in TIA safety issues leading to injury, environmental impact or significant regulatory enforcement; or a repetitive deficiency that demonstrates a systematic breakdown of procedures.

Priority 3: Single occurrences of deficiencies or non-conformances that alone would not be expected to result in TIA safety issues.

Priority 4: Best Management Practice as a suggestion for continuous improvement towards industry best practices that could further reduce potential risks.

Please do not hesitate to contact me at Ray.Proulx@teck.com or (250) 467-3194 if you have any further questions regarding the operation, maintenance and monitoring of the tailings facility.

Sincerely,



Ray Proulx
Site Manager, Pine Point Mine, Teck

cc: Wendy Bidwell, Water Resource Officer Department of Environment & Natural Resources
Joshua Gauthier, Water Resource Officer Department of Environment & Natural Resources
Norman McCowan, Resource Management Officer III, Government of Northwest Territories
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FRMC Acting President Arthur Beck,
Bjorn Weeks, Director, Environmental Legacies, Teck
Mark Slater, Manager Geotechnical and Water, Teck
Michelle Unger, Manager, Environmental Performance, Teck

Attachment:

- *Pine Point Mine Tailings Impoundment Area 2023 Annual Geotechnical Inspection*, dated December 18, 2023 prepared by Klohn Crippen Berger