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March 4, 2024

Andrew Wheeler and Andrea Cleland (via email only)  
Regulatory Specialists  
Mackenzie Valley Land and Water Board  
P.O. Box 2130  
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Yellowknife, NT X1A 2P6

Dear Mr. Wheeler and Ms. Cleland

**Reference: Management Plan Submissions (Water Licence: MV2017L2-0007 and Land Use Permit: MV2019X0006)**

Teck Metals Ltd. (Teck) respectfully submits the following documents to the Mackenzie Valley Land and Water Board (MVLWB) related to the Pine Point Tailings Impoundment Area (TIA):

- Water Management Plan (i.e., water treatment manual)
- Operation, Maintenance and Surveillance (OMS) plan

A conformance table is attached outlining the MV2017L2-0007 manual requirements and associated manual sections.

Updates to the Water Management Plan were administrative. The main change was to remove information that is presented in other plans to reduce redundancy and to avoid inadvertent inconsistencies. The reader is directed to specific documents such as the OMS and other operational plans (e.g., waste management plan, QAQC plan and contingency manual). The document was also updated to reflect changes in Teck's Legacy Properties team and reporting procedures.

The OMS has been updated to a new Teck Legacy template to reflect changes in Teck's Legacy Properties team and reporting procedures and to align with the Global Industry Standard on Tailings Management. Redundancy with other operating manuals has also been addressed. Although much of the information is the same, it may appear in a different order or within the appendices. Given the significant administrative edits, Teck understands that the whole document will be reviewed by the MVLWB for approval. The notable changes are related to the following:

- Section 4 has been updated to incorporate recent water balance information and updated maintenance procedures
- Section 5 includes updated performance objectives and more detailed water level surveillance procedures (i.e., the Trigger Action Response Plan). The specific changes are outlined as below.
  - The 2019 OMS Table 2-1 outlined the following operational water levels:
    - alert water level of 201.6 m which triggered physical monitoring of the facility and mobilization of water treatment activities,

- maximum operating water level of 201.8 m triggered actions to reduce the water level within the pond as a matter of urgency.
  - In 2021, the Water Management Manual was updated replacing the operating water levels with quantitative performance objectives based on analysis done by the Engineer of Record as per the following:
    - an interim Normal Operating Level of 201.9m was recommended for increased monitoring,
    - at 202.4 m would trigger to lower the pond by emergency discharge.
- The original Alert Water Level of 201.6 m was removed based on a better ability to remotely monitor the pond water level, as well as updates to the storage curve and quantification of risk.
- The 2024 OMS maintains the Normal Operating Level of 201.9 m as presented in 'Table 3.5 Water and Infrastructure Levels' and action responses are outlined in the TARP presented in Appendix B which includes the following items:
  - Additional flood water level monitoring
  - Rainfall forecast and monitoring
  - Vibrating wire piezometer thresholds

Like the previous 2021, it specifies emergency discharge action to manage potential high water level scenarios at site only under the following two scenarios:


- Rainfall higher than design capacity is forecasted, and dam overtopping is expected
- Water level is trending higher than the record high-water level, and/or evaluated as a dam safety issue by the EoR

In the event of potential emergency discharge, the regulator and communities of interest will be notified; and the untreated discharge permission from the regulator will be sought before the action is commenced.

We believe that the updated OMS alert levels and TARP is a better refined decision making process and is based on current data.

The Waste Management Plan, Contingency Manual and QAQC Plan are currently undergoing review and administrative updates, similar to those described above. We anticipate that these documents will be submitted to the MVLWB in the near future.

Sincerely,



Michelle Unger, B.Sc.  
Manager, Environmental Performance  
Teck

Cc: Ray Proulx, Teck  
Cindy Robinson, Teck

**Table A: Water Licence Management Plan Conformance table**

<b>Water Licence Requirements</b>	<b>Manual and Section</b>
<p>Part F: 2                      The Licensee shall act in accordance with the <b>Water Management Plan</b>, once approved by the Board. The Licensee shall annually review the approved Plan and make any necessary revisions to reflect changes in operations, technology, chemicals, or fuels, or as directed by the Board. The revised Plan shall include a brief summary of the changes made, and shall be submitted to the Board, for approval, at least 60 days prior to any proposed changes to the requirements in the approved Plan.</p>	<p><b>Water Management Plan - Version History table</b> provided on page iii</p>
<p>Part F: 3                      The Licensee shall act in accordance with the <b>Operations and Maintenance Plan</b> in the Accepted Application, and submit a revised Plan by February 1, 2018, for approval, which shall include the addition of the following information:</p> <ul style="list-style-type: none"> <li>a) A description, including detailed rationale, of the monitoring endpoints (Action Levels) for each parameter monitored in the Surveillance Network Program;</li> <li>b) Mitigation measures for decreasing pH at SNP station 35-1b when it exceeds effluent quality criteria, as specified in Part F, item 10;</li> <li>c) A description of response actions to be carried out if the Action Levels are exceeded; and</li> <li>d) Any other item as directed by the Board.</li> </ul>	<p><b>Section 4.4 of the OMS</b> does indicate that the action items are included in the Water Management Manual (PP-EP-001) as outlined below.</p> <p><b>Water Management Manual Section 2.1.1 Action Levels for Surveillance Monitoring Network</b> provides a) a description of the SNP and action levels developed for pH, TSS and zinc concentrations.</p> <p><b>Water Management Manual Section 9.2 Mitigation Measures</b> provides specifics on b) mitigation measures for reducing pH, TSS and zinc concentrations at 35-1b if the action levels are exceeded and <b>Section 9.1 Action Level Response</b> and c) action level response if action levels are exceeded</p>