

Reviewer Comments and Proponent Responses

Project: Teck Metals Pine Point Tailings Impoundment Area
Board: Mackenzie Valley Land and Water Board
Organization: Teck Metals Ltd.

| No. | Topic | Reviewer Comment | Reviewer Recommendation | Proponent Response | Board Decision |
|---|-----------------------|--|--|--|-------------------|
| GNWT - Environment and Climate Change - Environmental Regulatory Analyst | | | | | |
| 1 | GNWT-ECC Cover Letter | Please see attached. | N/A | NA | Noted |
| 2 | Reference Errors | <p>The Operations and Maintenance Plan (OMP) contain multiple references with an error message saying "Error! Reference source not found". These errors can be found in the following sections:</p> <p>3.4 Regulatory 3.6.1 Dyke Slope Stability 6.1 Maintenance Overview Table 6.1 Surveillance Monitoring and Frequency Summary 6.2.2.1 Visual Monitoring 6.2.2.4 Water Sampling and Testing 6.3 Periodic Review 7.3.1 Operations Reporting</p> | The Government of the Northwest Territories, Department of Environment and Climate Change recommends Teck Metals Limited include the correct references for all errors found in the OMP. | Apologies for the reference errors. The references will be updated in the document. | Adequate response |
| MVLWB - Andy Wheeler | | | | | |
| 1 | Table 5.1 | Footnote "a" states "Repair of access roads requires consultation/agreement with the MVLWB, as roads are on Crown or withdrawn Land." | Consider reviewing the scope of the authorizations and updating the footnote accordingly. | The footnote has been revised to "Not all access roads are within the Teck lease boundaries. For access road repair, please consult with the Site Manager to develop a work plan and to confirm that | Adequate response |

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| | | <p>Teck's ability to undertake the work described in the footnote depends on whether the activity and location are part of the scope of the authorizations.</p> <p>For any questions, please reach out to Board staff at your convenience.</p> | | <p>authorization to complete the work is within the scope of the existing permits. Additional permits may be required."</p> | |
| 2 | Appendix B, Trigger Action Response Plan | <p>In Appendix B, Teck has proposed medium and high action levels of the pond to be equal or greater than 202.4 m. Board staff understand the inflow design flood is also 202.4 m.</p> <p>If the IDF is exceeded, it is unclear what the potential consequences are for the downstream environment and structural stability. Board staff are trying to understand if setting the action level to exceed IDF is conservative enough.</p> | <p>Can Teck provide additional rationale for setting the action levels to exceed IDF?</p> <p>Can Teck discuss if a more conservative action level has been considered?</p> | <p>The action levels were not set to exceed the IDF. The IDF level is 203.0 m as stated as the emergency freeboard level in Table 3.5.</p> <p>The 202.4 m is the assumed initial water level before the IDF event and was selected as the action level because at this water level the facility has sufficient capacity for the design flood (1 in 1000-year return period). Additional text has been added to Appendix H Section H.4 to further describe the IDF.</p> | Adequate response |
| Environment and Climate Change Canada (ECCC) - Mr. Russell Wykes | | | | | |
| 1 | ECCC Comment | ECCC has reviewed this file in accordance with our mandate and has no comments at this time. | N/A | NA | Noted. |



April 5th, 2024

Jacqueline Ho
Technical Advisor
Mackenzie Valley Land and Water Board
P.O. Box 2130
Yellowknife, NT X1A 2P6

Dear Jacqueline Ho,

Re: Teck Metals Pine Point Tailings Impoundment Area Operations and Maintenance Plan V4

The Department of Environment and Climate Change, Government of the Northwest Territories (GNWT-ECC) has reviewed the application at reference based on its mandated responsibilities under the *Waters Act* and has provided comments and recommendations for consideration of the Mackenzie Valley Land and Water Board.

Any technical questions can be directed to Novelyn Bordey, Intern, Pollution Control with the Regulatory and Permitting Division at Novelyne_Bordey@gov.nt.ca.

Should you have any general questions or concerns, please do not hesitate to contact gnwt_ea@gov.nt.ca.

Sincerely,

Shakita Jensen
Environmental Regulatory Analyst
Environmental Impact Assessment
Department of Environment and Climate Change