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February 12, 2021

File: MV2020C0003 and MV2020L2-0002

Dave Webb, President
New Discovery Mines Ltd.
1909 108 West Cordova St.,
VANCOUVER BC V6B 0G5

sent via email

Dear Dave Webb:

**Waste Management Plan Version 13, Spill Contingency Plan Version 10 - Interim Approval - Resubmission Required
Engagement Plan Version 9 – Approved
New Discovery Mines Ltd. – Advanced Exploration, Mining and Milling, Discovery Lake, NT**

The Mackenzie Valley Land and Water Board (MVLWB or the Board) met on February 11, 2021 and reviewed the Waste Management Plan, Spill Contingency Plan, and Engagement Plan, which were submitted under Licence MV2020L2-0002 and Permit MV2020C0003 on February 1, 2021 in response to reviewer comments.

The Board hereby approves the Engagement Plan, Version 9 as submitted.

The Board requires that New Discovery Mines Ltd. resubmit the Waste Management Plan, Version 14 and Spill Contingency Plan Version 11 in accordance with comments made during this review, as presented in the attached Review Comment Table by March 31, 2021. The Waste Management Plan, Version 14 and Spill Contingency Plan, Version 11 will be considered approved upon receipt of this information and written confirmation of conformity from Board staff.

If you have any questions or concerns, please contact Shannon Allerston at (867) 766-7465 or email sallerston@mvlwb.com.

Yours sincerely,

A handwritten signature in blue ink, appearing to read "Mavis Cli-Michaud".

Mavis Cli-Michaud
Mackenzie Valley Land and Water Board, Chair

Copied to: Distribution List

Attached: Review Comment Table

Review Comment Table

Board:	MVLWB
Review Item:	Mon Gold Project - Revised Engagement, Spill and Waste Management Plans (MV2020L2-0002 MV2020C0003)
File(s):	MV2020C0003 MV2020L2-0002
Proponent:	New Discovery Mines
Document(s):	Cover Letter - Revised Plan Submissions (119 KB) Engagement Plan - Revision 9 (425 KB) Spill Contingency Plan - Revision 10 (1090 KB) Spill Contingency Plan Appendix B-1 - MSDS Sheets (4894 KB) Waste Management Plan - Revision 12 (757 KB)
Item For Review Distributed On:	Jan 5 at 14:37 Distribution List
Reviewer Comments Due By:	Jan 28, 2021
Proponent Responses Due By:	Feb 11, 2021
Item Description:	<p>New Discovery Mines Ltd. (the Applicant) submitted Revision 9 of its Engagement Plan, Revision 10 of its Spill Contingency Plan, and Revision 12 of its Waste Management Plan on January 4 and 5, 2021. These Plans are required by Licence MV2020L2-0002, Parts B, condition 21, Part G, condition 3, and Part F, condition 4 and Permit MV2020C0003 condition 86.</p> <p>Using the Online Review System (ORS), reviewers are invited to submit comments and recommendations on the documents linked below by the review comment deadline specified. Reviewers may also wish to consider providing an overarching recommendation regarding whether the Board should approve the submissions, to provide context for the comments and recommendations and assist the Board with its decision. If reviewers seek clarification on the submission, they are encouraged to correspond directly with the Applicant prior to submitting comments and recommendations.</p> <p>All documents that have been uploaded to this review are also available on our public Registry. If you have any questions or comments about the ORS or this review, please contact Board staff identified below.</p>
Contact Information:	Jen Potten 867-766-7468 Shannon Allerston 867-766-7465

Comment Summary

New Discovery Mines (Proponent)				
ID	Topic	Reviewer Comment/Recommendation	Proponent Response	Board Analysis
1	General File	Comment (doc) Modified as per comments. Recommendation		
2	General File	Comment (doc) Modified as per comments Recommendation		
3	General File	Comment (doc) Modified as per comments Recommendation		
4	General File	Comment (doc) Updated MSDS as per comments. Recommendation		
5	General File	Comment (doc) Updated Maps Recommendation		
6	General File	Comment (doc) Replacing SCP to attach map as opposed to keeping separate Recommendation		
7	General File	Comment (doc) Replacing WMP with MSDS and Maps attached Recommendation		
Fisheries and Oceans Canada: Sally Wong				
ID	Topic	Reviewer Comment/Recommendation	Proponent Response	Board Analysis
1	n/a	Comment DFO noticed that there was no submission of a Water Management Plan. DFO would like to remind New Discovery Mines Ltd. that end-of-pipe fish protection screens are required for water intakes. Recommendation n/a	Feb 1: Yes, appropriate end-of-pipe fish protection screens will be used, and this will be specified in the Water Management Plan.	Feb 1: Acknowledged.
GNWT - ENR - EAM (Environmental Assessment and Monitoring): Central Email GNWT				
ID	Topic	Reviewer Comment/Recommendation	Proponent Response	Board Analysis
1	General File	Comment (doc) General File - ENR cover letter with comments Recommendation		

2	Wildlife Attractants and Waste Management	<p>Comment The Waste Management Plan states that kitchen and dry waste will be stored in a secure location (Page 31 Other Waste - Kitchen and Dry Waste). However, the Waste Management Plan should specifically require that all food and garbage that may attract wildlife should be stored in animal-proof containers, which are cleaned regularly. Subject to sub-section 66(1) of the Wildlife Act no person shall store food, waste, or other substances in a manner that may attract big game and put people, domestic animals or wildlife in danger.</p> <p>Recommendation The Proponent should utilize food and garbage handling and storage procedures that will minimize the attraction of wildlife.</p>	<p>Feb 1: All kitchen waste not processed as grey water in the bioreactor will be bagged, stored in the camp freezer and flown to Yellowknife every 7 to 10 days. See page 32</p>	<p>Feb 1: Information on the management of kitchen wastes are found on page 33 (not 32). The information recommended by GNWT and the information provided by NDM in response does not fully align and is not reflected in the Kitchen and Dry Waste section of the Waste Management Plan.</p> <p>Update Waste Management Plan to reflect commitments in accordance with GNWT recommendations.</p>
3	None	<p>Comment None</p> <p>Recommendation The Proponent should store all food, waste, washed recyclables and debris that may attract wildlife within sealed animal proof containers until final disposal.</p>	<p>Feb 1: All food and food preparation and storage areas are kept clean, and all waste and waste disposal areas are kept clean</p>	<p>Feb 1: The information recommended by GNWT and the information provided by NDM in response does not fully align and is not reflected in the Kitchen and Dry Waste section of the Waste Management Plan.</p> <p>Update Waste Management Plan to reflect commitments in accordance with GNWT recommendations.</p>
4	None	<p>Comment None</p> <p>Recommendation The Proponent should ensure that sealed animal proof containers are cleaned once emptied to</p>	<p>Feb 1: The camp will be kept clean to avoid all animal attractants, dishes, tables, counters, stove,</p>	<p>Feb 1: The information recommended by GNWT and the information provided</p>

		minimize the attraction of wildlife.	refrigerators and freezers are kept clean.	by NDM in response does not fully align and is not reflected in the Kitchen and Dry Waste section of the Waste Management Plan. Update Waste Management Plan to reflect commitments in accordance with GNWT recommendations.
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MVLWB: Shannon Allerston

ID	Topic	Reviewer Comment/Recommendation	Proponent Response	Board Analysis
1	Spill Contingency Plan - Conformity Table	<p>Comment The Conformity Table does not accurately represent MVLWB Comment 15: Recommendation: There is no map provided in the Spill Contingency Plan. Maps provided throughout several different submissions (the Questionnaire, the Infrastructure Plan map) together contain most of the information required by the Spill Contingency Plan, but the Spill Contingency Plan should stand alone and contain all the information required by the Guidelines.</p> <p>Recommendation Figure 2 could address this comment, but the Figure Title should be expanded to indicate that it provides more information than waste storage locations (buildings, roads, culverts, airstrips and other infrastructure; all surface water bodies and direction of water flow including catchment basins; storage locations of each hazardous material; probable spill locations and direction of flow on land and in water; locations of all response</p>	<p>Feb 1: Map has redone as C-size MapSCPv1.pdf and included as a separate document</p>	<p>Feb 1: Previous comments and recommendations have not been addressed by the submission of another additional map. As mentioned in the recommendation, the SCP should stand alone and contain all the information required by the Guidelines. The additional map provides no additional context to the plan. The map currently included in the SCP (Figure 2) may suffice to meet the guidelines, however, additional information is required.</p> <p>Update Spill Contingency Plan to include references to Figure 2 and update the Figure's Title to better identify all the</p>

		equipment; environmentally sensitive areas; any approved disposal sites; topography e.g. slope of land; any other important on or off-site features).		information that can be gathered from this figure, as requires by the INAC Guidelines. The body of the SCP should provide context for the figure and its legend so that the information required by the Guidelines can be clearly understood. This includes the need to represent all of the following site information: buildings, roads, culverts, airstrips and other infrastructure; all surface water bodies and direction of water flow including catchment basins; storage locations of each hazardous material; probable spill locations and direction of flow on land and in water; locations of all response equipment; environmentally sensitive areas; any approved disposal sites; topography e.g. slope of land; any other important on or off-site features.
2	Waste Management Plan - Table of Contents	Comment There are many Errors in the Table of Contents. Recommendation This should be addressed.	Feb 1: Table of contents updated. Automatic links confirmed.	Feb 1: Errors appear to have been addressed.
3	Waste Management Plan - Conformity Table	Comment The Conformity Table does not accurately represent ENR-EAM Comment 2: ENR notes that overall, this application lacks sufficient information to properly assess the	Feb 1: Geochemistry for rocks, tailings and water has been expanded (pages 19-26)+G6. Details on specifics are in Waste Rock Management and	Feb 1: The Waste Management Plan relies heavily on documents not yet reviewed.

		<p>environmental risks. Minimal geochemistry data for rock, tailings, and water has been provided, minimal monitoring has been described, and the designs for facilities such as the landfarm and dry stack tailings facility are incomplete.</p> <p>Recommendation The response does not address (geo)chemistry data for rock, tailings, or water, and does not address monitoring. These topics should be addressed, including where in the Plan information has been added to address the GNWT comment and recommendation.</p>	<p>Geochemical Characterization Plan. Monitoring of the Landfarm and DST are in separate documents.</p>	<p>Update the Waste Management Plan to reduce the duplication of information provided in management and monitoring plans that are currently under development. If details on the management of waste rock, contaminated soil, water, etc. are found in more detail in pending plans, this should be made clear in the WMP's introduction. It is noted that associated management plans are listed but when other plans are being used to document the waste management practices in detail instead of the WMP, reviewers should be clearly directed to the appropriate plan.</p> <p>Update the Waste Management Plan so that the Introduction section is updated and accurately reflective the content of this revision.</p>
4	Waste Management Plan - Conformity Table	<p>Comment Conformity Table; in response to GNWT-EAM comment 16, it states that details are expanded here but the location of changes in the document have not been identified.</p> <p>Recommendation The location of all edits should be identified to facilitate reviews.</p>	<p>Feb 1: Changes have page numbers or subtitles cross referenced.</p>	<p>Feb 1: Page numbers have been provided. ENR recommended that New Discovery conduct additional geochemical sampling and analysis on waste rock, gravity tailings, and flotation tailings in order to better characterize the</p>

				<p>ARD/ML potential of these materials. This WMP acknowledges plans to sample, test, and segregate waste rock based on results. There is no mention in the section referred to on additional analysis of gravity tailings or flotation tailings.</p> <p>Update the Waste Management Plan so that this section refers to the Waste Rock and Geochemical Characterization Plan. This plan is where reviewers should be able to find the details of how rocks and tailings will be sampled, analyzed, interpreted and categorized, managed and monitored for the life of the Project.</p>
5	Waste Management Plan - Cross-Referencing	<p>Comment In response to GNWT-EAM comment 12, it states that a separate Hydrocarbon Contaminated Soil Treatment Facility Plan is provided. This document has not been submitted. Above, in response to GNWT-EAM Comment 2, it refers to a Landfarm Management Plan. For MVLWB comment 18, it refers to Landfarm Operations and Management Plan. Are these referencing the same document? If so, the name should be verified and made consistent.</p> <p>Recommendation References to all supporting documents being developed to support the Waste Management Plan should be provided in the body of the WMP, maybe in a table early in</p>	<p>Feb 1: References to all supporting documents being developed to support the Waste Management Plan are listed in Associated Management Plans Pg. 12. The Waste Rock Management and Geochemical Characterization and Monitoring Plan, Water and Groundwater Management and Monitoring Program, Hydrocarbon-Contaminated Soil Treatment Facility Plan, and Explosives Management Plan have been submitted for review. Structure</p>	<p>Feb 1: This does not address the comment and recommendation. There are inconsistencies in the naming and referencing of supporting documents that need to be clarified.</p> <p>For clarity and consistency, all plans submitted to the Board and all references to those plans should match the requirements of the Licence and Permit.</p>

	the document, and again in each relevant section. These should include: relevant Structure Description/Design and Construction Plans, Waste Rock Management and Geochemical Characterization and Monitoring Plan, Water and Groundwater Management and Monitoring Program, Tailings Management Plan, Hydrocarbon-Contaminated Soil Treatment Facility Plan, and Explosives Management Plan. NDM should be careful to ensure all external document references match the requirements of the Licence and are consistent throughout.	Description/Design and Construction Plans, Tailings Management Plan are being prepared and will be submitted.	
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Tlicho Government: LONGINUS EKWE

ID	Topic	Reviewer Comment/Recommendation	Proponent Response	Board Analysis
1	Community Engagement Plan	<p>Comment From the description of NDM project location, part of Mon Gold mine project is located in Monfwi Gogha de Netiilee. According to NDM's engagement plan, contacts has been made with YKDFN, NSMA and City of Yellowknife. Nothing in the engagement document mentions engagement with the Tlicho Government.</p> <p>Recommendation Should you have any questions regarding Tlicho engagement on regulatory matters, please contact Ms. Violet Camsell-Blondin at Phone: (867) 392 6381 ext. 1336, Cell: (867) 444 0006 Email: violetcamsellblondin@tlicho.com</p>	<p>Feb 1: Appendix A, Consultation Log is updated to show nineteen separate discussions with Tlicho and Kwe Beh working group Starting in September 2013</p>	<p>Feb 1: Acknowledged. Note that recent engagement with Tlicho up to January 2021 has been provided but this takes the format of the engagement log out of order (chronologically). Also note that there does not appear to have been any additional engagement with parties on the development of the revised management plans or management plan that are being submitted as required by the licence and permit. Updates to the Engagement plan required for this revision was to identify triggers for future and ongoing</p>

				<p>engagement. These triggers included the design of monitoring programs, which the plans being drafted are supposed to include.</p> <p>Upon approval of the Engagement Plan, engagement activities identified therein should be adhered to. New Discovery should ensure adequate engagement is carried out in the development of the Management and Monitoring Plans currently under development.</p>
2	Spill Contingency Plan	<p>Comment Since 2015, most manufacturers have revised their MSDS to reflect the new SDS as can be seen in Cytec and Chevron/Texaco documents. Could you verify if your other suppliers have made any revisions to their documents so that you can update your contingency records and as well update the users (employees) of changes if any.</p> <p>Recommendation N/A</p>	<p>Feb 1: Reviewed. MSDS sheets have been updated and will be resubmitted.</p>	<p>Feb 1: Acknowledged.</p>
3	Spill Contingency Plan/waste management	<p>Comment On page 10 of the spill contingency plan, NDM stated, "that waste oil is stored in empty 200L drums in either of the fuel storage areas, and shipped out by plane or truck for off-site disposal at an appropriate waste facility".</p> <p>Recommendation Could this statement be rephrased to reflect the willingness to accept or to have accepted taking the waste from NDM, as opposed to</p>	<p>Feb 1: Rephrased, adding KBL contact information. Pg. 11.</p>	<p>Feb 1: Acknowledged.</p>

		just using the word “appropriate” which doesn’t indicate that this facility has agreed to accept NDM waste or has been accepting NDM waste as an off-site waste facility.		
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