

Version 3 Hammond Reef Gold Project EIS/EA – Addendum (Part B)  
Responses to Provincial Information Requests

1656263

Identifier	Topic	Reference to EIS/EA Report	Summary of Previous Comment	Proponent's Response to Previous Comment	Follow-up comment/ Request for Information	New Proponent Response	Subsequent Comment
			<i>Date: March 2014</i> <a href="#">MOE SW-11</a>	<i>Date: June 2015</i>	<i>Date: August 2015</i>	<i>Date: November 2015</i>	
MOE SW-11B	Surface water	EIS/EA § 6.1.3.1, §6.1.3.2, §6.1.3.3, §6.8, §8.2.2; Hydrlogy TSD §5.2.2, §6.2.2, §8.0	The water balance modelling done for the proposed mine will need to be reviewed and verified by a hydrologist once a Permit To Take Water application is submitted to MOE at the permitting and approvals stage. This information is beyond the scope of this surface water review. It appears that all of the potential impacts due to changes in the water balance at the site and within Marmion Lake and the Seine River have been outlined in the EIS/EA Report; however, the accuracy of the modelling will need to be further reviewed at permitting.	It is acknowledged that the water balance modelling will be reviewed once a Permit to Take Water application is submitted to MOE.	<p>MNRF and stakeholders (Brookfield and H2O Power) have expressed their ongoing concerns with CMC's proposed water takings from Marmion Lake during the operation of the proposed Hammond Reef Site. Since this aspect of the project has a high risk of socioeconomic effects, these effects need to be clearly outlined in the EA so that mitigation measures can be determined and so that they can be considered in the EA decision.</p> <p>Without this information in the EA, the proponent is accepting a very high level of risk. Based on the current information provided to date, the MOECC would not be able to issue a permit to take water until a thorough assessment of all cumulative effects is completed to the satisfaction of the Ministries.</p> <p>Information needs include the following:</p> <ul style="list-style-type: none"> <li>In order to assess effects under a low flow scenario, the proponent should explain in the EA how they would operate the mine under the climatic conditions experienced in 2010, an extreme low-flow year. This may require ceasing all water takings from Marmion Reservoir and recirculating water until conditions improve</li> </ul>	<p>The predicted changes in Raft Lake Dam water levels and outflows for bounding or 'worst case' scenarios are provided in Section 6.1.3.1 through Section 6.1.3.3 of the EIS/EA Report and in Section 5.2.2 and Section 6.2.2 of the Hydrology TSD. The cumulative effects assessment is described in Section 6.8 of the EIS/EA Report. Low flow conditions were considered in the assessments.</p> <p>The maximum possible changes in Raft Lake Dam outflows are less than 5% which is within the error of a flow measurement and calibration/validation of a detailed hydrologic model. Changes in Seine River flows downstream of the dam will be even smaller due to additional inflows to the river system.</p> <p>At this time, a Permit to Take Water is not being sought, only approval of the environmental assessment.</p> <p>A technical memorandum is being prepared that outlines contingency measures during low water level and flow conditions at Raft Lake Dam. It is presumed that these are defined by the lower compliance level specified in the Seine River Water Management Plan (p165). The Plan defines the lower compliance level as when reservoir outflows are at minimum values specified and water levels are below the minimum specified elevation for that day. Both conditions must exist at the same time.</p> <p>The monitoring program proposed to assess compliance with permit conditions is outlined in Section 8.2.2 of the EIS/EA Report and in Chapter 8 of the Hydrology TSD.</p>	<a href="#">MOE SW-11C</a>

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					<ul style="list-style-type: none"> <li>• Explanation of how they plan to continue operations during periods of extremely low flows including potential mitigation measures and approaches</li> <li>• After assessing level and flow bands in the Seine River WMP, determine the water and flow levels at which fresh water takings for mine operations would cease in order to prevent downstream waterpower facilities from entering a state of non-compliance</li> <li>• Explanation of how they will monitor and report water takings, flows, and levels in order to assess compliance with permit conditions.</li> </ul> <p>The project's hydrology reports are currently being reviewed by an MOECC regional hydrologist who will provide comments under separate cover.</p>		