

## **Attachment 1**

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# **CEAA January 13 and March 21, 2016 AIR Tracking Tables**

| <b>Table 1 January 13, 2016 CEAA Additional Information Requests for Benga Mining Limited (Benga Mining) Proposed Grassy Mountain Coal Project</b><br><b>Cross Reference (Concordance) Table to Location in the Integrated Application</b> |  |   |   |                             |
|--|--|---|---|-----------------------------|
| IR No.   | Information Request  | Section   | Consultant Report   | Appendix                    |
| 1.0  | <b>PROJECT OVERVIEW</b>  |   |   |                             |
| 1.0  | <b>Project Overview</b>  |   |   |                             |
| 1.1  | Provide a description of the components associated with the proposed Project, including: <ul style="list-style-type: none"> <li>a) all physical works associated with the Project (e.g., buildings, bridges, culverts, railways, roads, and transmission lines) including their purpose, approximate dimensions, and capacity (e.g., number and size of trucks or train cars/day, size or scale of disposal areas, volume of haul and overburden, camp size and number of occupants, length and routing of conveyor, length and routing of transmission lines); and</li> <li>b) a description of the timeframe in which the development of each Project component is to occur and the key Project phases.</li> </ul> | <a href="#">Section A.6</a><br><a href="#">Figure A.1.0-2</a> | ---   | ---                         |
| 1.2  | Include the golf course as a component of the Project and provide an assessment of the environmental effects of this Project component.  | <a href="#">Section A, Table A.4.0-1</a>                      | <a href="#">CR #7, Table 2.1-1</a><br><a href="#">CR #7, Sections 2.1.1, 6.2, 7.1, 7.1.1, and 7.1.3.</a><br><a href="#">CR #8, Sections 1.3.1, 3.3.1, 4.0, 4.1.1, and 4.3.4.1</a><br><a href="#">CR #8, Table 2.4-1</a><br><a href="#">CR #9, Sections 1.0, 1.2.1, 2.4.1, 3.1, 3.2.5.3, and 4.0</a> | ---                         |
| 2.0  | <b>PREPARATION AND PRESENTATION OF EIA</b>   |   |   |                             |
| 2.1  | <b>Presentation and Organization of the EIA</b>  |   |   |                             |
| 2.1  | Provide a comprehensive table of concordance which rigorously and accurately cross-references the information presented in the complete EIA with information requirements identified in the Guidelines.  | ---   | ---   | <a href="#">Appendix 2A</a> |
| 3.0  | <b>ALTERNATIVE MEANS OF CARRYING OUT THE PROJECT</b>   |   |   |                             |
| 3.1  | <b>Alternative Means for Carrying Out the Project</b>  |   |   |                             |
| 3.1  | Discuss alternative means for all key project components, including those identified above, and: <ul style="list-style-type: none"> <li>a) include an alternative means assessment for all key components;</li> </ul>  | <a href="#">Section A.7</a>                                   | ---   | ---                         |

| <b>Table 1      January 13, 2016 CEAA Additional Information Requests for Benga Mining Limited (Benga Mining) Proposed Grassy Mountain Coal Project</b><br><b>Cross Reference (Concordance) Table to Location in the Integrated Application</b> |   |   |   |                             |
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|   | b) discuss the potential for non-rail transportation options;<br>c) provide a consistent approach for the analysis of alternative means for each key project component where feasible. It is recognized that such ranking criteria may not be necessary particularly in cases where there may only be one or two technically or economically feasible options, however details should be well described including cost ranges and/or technical limitations in these cases; and<br>d) assess the environmental effects of the alternative means. |   |   |                             |
| 4.0   | <b>ABORIGINAL PEOPLES</b>   |   |   |                             |
| 4.0   | <b>Aboriginal Engagement and Concerns</b>   |   |   |                             |
| 4.1   | Provide a discussion of which VCs suggested by Aboriginal groups were included in the EIA and a rationale for any exclusion.  | <a href="#">Section H.2.2, Table H.2.2-1</a>  | <a href="#">CR #6, Section 3.1.1, Table 3.2</a><br><a href="#">CR #8, Section 3.6, Table 3.6-1</a><br><a href="#">CR #9, Table 2.2-1</a><br><a href="#">CR #9, Section 3.2.3</a><br><a href="#">CR #10, Table 3.2-1</a><br><a href="#">CR #11, Section 9.3, Table 9.1</a> | ---                         |
| 4.2   | Provide a description of each Aboriginal group's potential or established rights.   | <a href="#">Section H.3.3</a> (Kainai Nation)<br><a href="#">Section H.4.3</a> (Piikani Nation)<br><a href="#">Section H.5.3</a> (Siksika Nation)<br><a href="#">Section H.6.3</a> (Stoney Nakoda Nation)<br><a href="#">Section H.7.3</a> (Tsuu T'ina Nation)<br><a href="#">Section H.8.1</a> (Ktunaxa Nation)<br><a href="#">Section H.9.1</a> (Samson Cree Nation)<br><a href="#">Section H.10.1</a> (Shuswap Indian Band)<br><a href="#">Section H.11.1</a> (Foothills Ojibway First Nation)<br><a href="#">Section H.12.1</a> (Métis Nation of Alberta Region 3)<br><a href="#">Section H.13.1</a> (Métis Nation of BC Region 4)<br><a href="#">Figures H.3.3-1 to H.13.4-1</a><br>Aboriginal background information and figures of traditional lands | ---   | <a href="#">Appendix 7C</a> |

| <b>Table 1      January 13, 2016 CEAA Additional Information Requests for Benga Mining Limited (Benga Mining) Proposed Grassy Mountain Coal Project</b><br><b>Cross Reference (Concordance) Table to Location in the Integrated Application</b> |   |   |                   |          |
|---|---|---|-------------------|----------|
| IR No.  | Information Request   | Section   | Consultant Report | Appendix |
| 4.3   | Provide an analysis of the significance of potential impacts to potential or established Aboriginal or treaty rights. The comments below on cumulative effects assessment should be considered within the context of this information request.                  | <a href="#">Section H.3.4, Tables H.3.4-1 to H.3.4-4</a> (Kainai Nation)<br><a href="#">Section H.4.4, Tables H.4.4-1 to H.4.4-6</a> (Piikani Nation)<br><a href="#">Section H.5.4, Tables H.5.4-1 to H.5.4-4</a> (Siksika Nation)<br><a href="#">Section H.6.4, Tables H.6.4-1 and Section H.6.4-2</a> (Stoney Nakoda Nation)<br><a href="#">Section H.7.4, Tables H.7.4-1 to H.7.4-4</a> (Tsuu T'ina Nation)<br><a href="#">Section H.8.4</a> (Ktunaxa Nation)<br><a href="#">Section H.9.4, Tables H.9.4-1 to H.9.4-4</a> (Samson Cree Nation)<br><a href="#">Section H.10.4</a> (Shuswap Indian Band)<br><a href="#">Section H.11.4</a> (Foothills Ojibway First Nation)<br><a href="#">Section H.12.4, Tables H.12.4-1 to H.12.4-3</a> (Métis Nation of Alberta Region 3)<br><a href="#">Section H.13.4</a> (Métis Nation of BC Region 4)<br><a href="#">Section E.10.3</a> Summary of potential impacts on land & resource use (including resource development, hunting & trapping, access, unique sites)<br><a href="#">Section E.13.3</a> Potential impacts on historical resources | ---               | ---      |
| 4.4   | Provide a discussion of the potential adverse impacts of each of the Project components and physical activities for all phases on Aboriginal or treaty rights. Benga Mining has discretion to determine what they believe to be the appropriate Project phases. | <a href="#">Sections H.3.5 and H.3.6.3; Table H.3.5-1</a> (Kainai Nation)<br><a href="#">Sections H.4.5 and H.4.6.3; Table H.4.5-1</a> (Piikani Nation)<br><a href="#">Sections H.5.5 and H.5.6.3; Table H.5.5-1</a> (Siksika Nation)<br><a href="#">Sections H.6.5 and H.6.6.3; Table H.6.5-1</a> (Stoney Nakoda Nation)   | ---               | ---      |

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|   |   | <a href="#">Sections H.7.5 and H.7.6.3; Table H.7.5-1</a> (Tsuu T'ina Nation)<br><a href="#">Section H.8.4</a> (Ktunaxa Nation)<br><a href="#">Sections H.9.5 and H.9.6.1</a> (Samson Cree Nation)<br><a href="#">Section H.10.4</a> (Shuswap Indian Band)<br><a href="#">Section H.11.4</a> (Foothills Ojibway First Nation)<br><a href="#">Sections H.12.5 and H.12.6.3; Table H.12.5-1</a> (Métis Nation of Alberta Region 3)<br><a href="#">Section H.13.4</a> (Métis Nation of BC Region 4)<br><a href="#">Sections E.8.3.4 and E.8.3.6</a> Potential effects on forestry resources and traditional use vegetation<br><a href="#">Section E.9.3</a> Potential impacts on wildlife VCs (including traditional use species)<br><a href="#">Section E.10.3</a> Potential impacts land & resource use (including resource development, hunting, trapping, access, and unique sites)<br><a href="#">Section E.11.3.8</a> Potential impacts of socio-economic conditions related to traditional use |                   |                             |
| 4.5   | Review all measures identified to mitigate potential adverse impacts on potential or established Aboriginal or treaty rights and ensure they are written as specific commitments that clearly describe how Benga Mining intends to implement them. In doing so, it is recommended to include all mitigation measures identified for the Project in a table format that can be updated as the environmental assessment process proceeds. | ---  | ---               | <a href="#">Appendix 2B</a> |
| 4.6   | Provide a discussion of the views of Aboriginal groups on the effectiveness of the mitigation or accommodation measures.  | <a href="#">Section H.2.4</a><br><a href="#">Section H.2.7</a><br><a href="#">Section H.3.7</a>  | ---               | ---                         |

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| IR No.   | Information Request  | Section   | Consultant Report   | Appendix |
|  |  | <a href="#">Section H.4.7</a><br><a href="#">Section H.5.7</a><br><a href="#">Section H.6.7</a><br><a href="#">Section H.7.7</a><br><a href="#">Section H.9.7</a><br><a href="#">Section H.12.7</a><br>(no group has yet provided feedback on effectiveness but these groups indicate monitoring will verify effectiveness)   |   |          |
| 4.7  | Provide a thorough discussion on how Aboriginal traditional knowledge was incorporated into the environmental effects assessment and the consideration of potential adverse impacts on potential or established Aboriginal or Treaty rights and related mitigation measures.   | <a href="#">Section H.1.1.4.3</a><br><a href="#">Sections H.2.2, H.3.4, H.4.4, H.5.4, H.6.4, H.7.4, H.8.4, H.9.4, H.10.4, H.11.4, H.12.4, and H.13.4 (and tables therein)</a><br>(potential effects and mitigation measures for consulted Aboriginal groups)<br><a href="#">Tables H.3.8-1, H.4.8-1, H.3.8-1, H.6.8-1, H.7.8-1, H.8.5-1, H.9.8-1, and H.12.8-1</a><br>(Feedback from and responses to consulted Aboriginal groups)<br><a href="#">Sections H.3.5, H.4.5, H.5.5, H.6.5, H.7.5, H.9.5, and H.12.5 (characterization of residual effects for consulted Aboriginal groups)</a><br><a href="#">Sections H.3.6, H.4.6, H.5.6, H.6.6, H.7.6, H.9.6, and H.12.6 (cumulative effects assessment for for consulted Aboriginal groups)</a> | <a href="#">CR #1A, Section 2.5.3.2</a><br><a href="#">CR #5, Sections 3.2.2 and 3.2.5</a><br><a href="#">CR #6, Sections 2.1 and 3.1.1, Table 3.2</a><br><a href="#">CR #8, Sections 3.6 and 4.6, Table 3.6-1</a><br><a href="#">CR #9, Table 2.2-1</a><br><a href="#">CR #9, Sections 3.2.3, 5.6, 7.1, and 7.2</a><br><a href="#">CR #11, Section 9.0</a><br><a href="#">CR #12, Sections 2.2 and 5.1.3.1</a> | ---      |
| 5.0  | <b>ABORIGINAL PEOPLES</b>  |   |   |          |
| 5.0  | <b>Species Important to Aboriginal People's Current Use of Resources</b>   |   |   |          |
| 5.1  | Provide a list of all species important to the current use of lands and resources by Aboriginal peoples. Describe changes to key habitat for each of these species, or group of species, regardless of their status as VCs in the wildlife section, and explain how changes in key habitat are linked to any predicted changes in the current use of the resource by Aboriginal peoples. | <a href="#">Section H.2.2, Table H.2.2-1</a>  | <a href="#">CR #6, Section 3.1.1, Table 3.2</a><br><a href="#">CR #8, Section 3.6, Table 3.6-1</a><br><a href="#">CR #9, Table 2.2-1, Section 3.2.3</a><br><a href="#">CR #10, Table 3.2-1</a><br><a href="#">CR #11, Section 9.3, Table 9.1</a>  | ---      |

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| 5.2  | Provide a discussion on how the VCs for both the Wildlife section and Land and Resource Use Section of the EIA were selected.  | ---             | CR #9, Section 3.2.3<br>CR #10, Section 3.2  | ---      |
| 6.0  | <b>ATMOSPHERIC ENVIRONMENT</b>   |                 |  |          |
| 6.1  | <b>Baseline Ambient Air Quality</b>  |                 |  |          |
| 6.1  | In accordance with the Guidelines, explain how the requirement to provide baseline ambient air quality at the mine site for the identified compounds has been met given that the air quality stations used are not located in close proximity to the Project. In responding, give consideration to the limitations of its assessment in the explanation.   | Section E.1.2.2 | ---  | ---      |
| 7.0  | <b>CHANGES TO TERRESTRIAL ENVIRONMENT</b>  |                 |  |          |
| 7.1  | <b>Landscape Disturbance</b>   |                 |  |          |
| 7.1  | Describe the overall changes to the terrestrial environment related to landscape changes.  | Section F.4     | ---  | ---      |
| 8.0  | <b>FISH AND FISH HABITAT</b>   |                 |  |          |
| 8.1  | <b>Fish and Fish Habitat</b>   |                 |  |          |
| 8.1  | Provide an assessment of the effects of changes to the aquatic environment and based on those predicted effects, discuss the impact to the fish resources identified by Benga Mining and its habitat in the LSA and RSA. In providing its analysis and conclusions, Benga Mining will make it clear what project activity or project component is causing the effect.  | ---             | CR #6 Aquatic Resources Addendum, Sections 3.0, 4.0 and 5.0.   | ---      |
| 9.0  | <b>FISH AND FISH HABITAT</b>   |                 |  |          |
| 9.1  | <b>Mitigation Measures</b>   |                 |  |          |
| 9.1  | For all impacts to fish and fish habitat, Benga Mining is required to:<br>a) identify the technically and economically feasible mitigation measures that will be undertaken to mitigate the significant adverse effects predicted on the biological conditions of Blairmore Creek and Gold Creek and their tributaries in the LSA;<br>b) explain how the mitigation measures are meant to reduce significance; and<br>c) discuss the anticipated effectiveness of the mitigation measures; and if there is some question as to the effectiveness of the mitigation measure or if | ---             | CR #6 Aquatic Resources Addendum, Section 4.2 (mitigation measures are described in each pathway)<br>CR #6 Aquatic Resources Addendum, Section 4.2, Table 4.2<br>CR #6 Aquatic Resources Addendum, Sections 4.5, 4.6 and | ---      |

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|--|--|---|--|----------|
| IR No.   | Information Request  | Section   | Consultant Report  | Appendix |
|  | mitigation of the effect is not feasible, provide a rational and discuss the potential risks and effects to the environment including to the fish species identified as VCs before and after contingency measures, such as offsetting and/or compensation, will be applied.  |   | 6.0  |          |
| 10.0   | <b>WILDLIFE</b>  |   |  |          |
| 10.0   | <b>Migratory Birds</b>   |   |  |          |
| 10.1   | Given the number migratory birds that will likely be displaced to adjacent habitat in or near the property, the uncertainty of the relative abundance of the avian species identified as VCs, as well as the lack of discussion on the potential effects to migratory bird populations Benga Mining is required to provide a detailed discussion on the potential for the Project to impact migratory birds as required by the Guidelines.   | ---   | CR #9 Sections 4.6 and 5.5   | ---      |
| 10.2   | Provide a discussion on the effects of the Project on the survival and recovery of the avian species identified as VCs.  | ---   | CR #9, Section 5.5   | ---      |
| 11.0   | <b>WILDLIFE</b>  |   |  |          |
| 11.1   | <b>Species at Risk – Westslope Cutthroat Trout</b>   |   |  |          |
| 11.1   | <p>Given the requirements of the CEAA 2012 and the Guidelines, as well as the known occurrence of westslope cutthroat trout in the project area, it is important for Benga Mining to provide:</p> <p>a) a detailed discussion on the potential for the Project to impact westslope cutthroat trout as a species at risk, cumulative impacts of the project in combination with threats to the species as identified in the recovery plan, as well as the potential recovery of the species, as required by the Guidelines.</p> | ---   | <p>CR #6 Aquatic Resources Addendum, Section 3.0</p> <p>CR #6 Aquatic Resources Addendum, Section 4.0</p> <p>CR #6 Aquatic Resources Addendum, Appendix A4</p> <p>Attachment 3, AIR #4</p> | ---      |
| 12.0   | <b>SIGNIFICANCE OF PROJECT EFFECTS</b>   |   |  |          |
| 12.1   | <b>Significance of Project Effects</b>   |   |  |          |
| 12.1   | Provide an analysis of the significance of the residual adverse environmental effects for the Noise, Socio-Economic, Heritage Resources and Human Health, and any other VCs as necessary. The assessment should be guided by the Agency's reference guide "Determining Whether a Project is Likely to Cause Significant Adverse Environmental Effects".  | Section H.2.2, Table H.2.2-1<br>Section E.13., Table E.13.6-1 | <p>CR #6, Section 3.1.1, Table 3.2</p> <p>CR #2A, Table 6.3-1</p> <p>CR #11, Sections 4.0, 5.3.1.2, 6.3.2, 7.3, 8.3.2, 9.3, and 10.3.2</p> <p>CR #12, Section 8.0, Table 8.0-1</p>         | ---      |



| <b>Table 1 January 13, 2016 CEEA Additional Information Requests for Benga Mining Limited (Benga Mining) Proposed Grassy Mountain Coal Project</b><br><b>Cross Reference (Concordance) Table to Location in the Integrated Application</b> |   |  |                   |          |
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| IR No.   | Information Request   | Section  | Consultant Report | Appendix |
| 13.0   | <b>EFFECTS OF POTENTIAL ACCIDENTS OR MALFUNCTIONS</b>   |  |                   |          |
| 13.1   | <b>Environmental Effects of Potential Accidents or Malfunctions</b>   |  |                   |          |
| 13.1   | For each identified accident and malfunction, provide a quantitative description of the magnitude of releases or a rationale outlining why a quantitative description cannot be used in assessing a specific accident and malfunction.  | <a href="#">Section C.9, Table C.9.10-1</a>                          | ---               | ---      |
| 14.0   | <b>EFFECTS OF POTENTIAL ACCIDENTS OR MALFUNCTIONS</b>   |  |                   |          |
| 14.0   | <b>Contingency Plans</b>  |  |                   |          |
| 14.1   | Provide details of the Emergency Response Plan in relation to water management for a dam failure.   | <a href="#">Section C.9.5.2.2</a><br><a href="#">Section C.7.6.3</a> | ---               | ---      |
| 14.2   | Identify contingency plans and emergency response procedures for all other considered accidents and malfunctions.   | <a href="#">Section C.9</a>  | ---               | ---      |
| 14.3   | Assess the potential effects of wildfire as an accident or malfunction of the Project.  | <a href="#">Section C.7.7</a><br><a href="#">Section C.10.1.3</a>    | ---               | ---      |
| 15.0   | <b>EFFECTS OF THE ENVIRONMENT ON THE PROJECT</b>  |  |                   |          |
| 15.0   | <b>Extreme Weather Events and Climate Change</b>  |  |                   |          |
| 15.1   | Identify the potential impacts of climate change on the Project, from the standpoint of effects on project components and on VCs, using the Agency procedural guidance on "Incorporating Climate Change Considerations in Environmental Assessment: General Guidance for Practitioners". For Project components and VCs that are identified as not being sensitive to climate change, a rationale should be provided for their exemption. | <a href="#">Section C.10</a>   | ---               | ---      |
| 15.2   | For each Project phase, assess the effects of the environment on the Project, including climate change, extreme weather conditions and natural hazards, and indicate the probability of such events occurring. The assessment should include details on planning, design, and construction strategies to minimize the potential environmental effects of the environment on the Project.  | <a href="#">Section C.10</a>   | ---               | ---      |

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| IR No.   | Information Request  | Section                  | Consultant Report  | Appendix |
| 16.0   | <b>CUMULATIVE EFFECTS ASSESSMENT</b>   |                          |  |          |
| 16.0   | <b>Cumulative Effects Assessment</b>   |                          |  |          |
| 16.1   | <p>Review the cumulative effects assessment and provide, as appropriate, additional detail or an explanation for inclusion/non-inclusion of the following activities:</p> <ul style="list-style-type: none"> <li>Michelle Creek Coaking Coal project in the Elk Valley, BC</li> <li>Teck Baldy Ridge Expansion Project at the existing Elkview Mine, BC</li> <li>Castle Rock Ridge to Chapel Rock Transmission Project, AB</li> <li>tourism activities including hiking, ATV use, horseback riding, Lost Lemon Campground, ski hills, mountain bike trails, and the Crowsnest Trail</li> <li>golf course</li> <li>helicopter pads or activities</li> <li>existing dams on Gold and Blairmore Creeks</li> <li>nearby leases</li> <li>Legacy mines including Greenhill, Bear Valley, and Bellevue underground mines</li> <li>future plans and access to the 'green area' defined in the South Saskatchewan Regional Plan</li> <li>South Saskatchewan Trail Systems Plan</li> <li>agriculture and ranching, including cattle crossing or creeks and tributaries</li> <li>condo and/or residential developments in Blairmore</li> <li>specific project/activities from the communities of Maycroft, Burmis, Lundbreck, Cowley</li> </ul> | Section D, Table D.2.4-2 | ---  | ---      |
| 16.2   | <p>For each VC that is predicted to have residual adverse effects as a result of the Project, provide an analysis of the total cumulative effects, following the Agency's guidance on "Addressing Cumulative Environmental Effects under CEEA 2012". The identified VCs should include those outlined in the Guidelines (<i>i.e.</i>, surface water quality, fish and fish habitat, migratory birds, species at risk, and Aboriginal people). The analysis should include:</p> <p>a) how the VC was identified and the rationale for its selection, spatial and temporal boundaries, sources of cumulative effects, mitigation measures, significance, and follow-up program;</p>  | ---                      | <p>CR #5, Section 4.0</p> <p>CR #6, Section 5.0</p> <p>CR #6 Aquatic Resources Addendum, Sections 4.4 and 4.5</p> <p>CR #9, Section 6.3, Table 6.4-1</p> <p>CR #1A, Section 6.1</p> <p>CR #8, Sections 1.4.6 and 4.6.2</p> <p>CR #10, Section 3.2, Table 3.2-1</p> | ---      |

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|--|---|--|---|---|
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|  | b) how the VC has been affected by past projects and activities;<br>c) how the VC would be further affected by the residual effects of the Project; and<br>d) how other certain and reasonably foreseeable projects and activities may also affect the VC.  |  | <a href="#">CR #12, Sections 4.1 and 4.2</a><br><a href="#">CR #3, Section 6.0</a><br><a href="#">CR #7, Sections 6.3, 7.1.2, 7.2.2, 7.3.2, and 7.4.2</a><br><a href="#">CR #11, Sections 2.1.1 and 2.1.2</a> |   |
| 17.0   | <b>SUMMARY OF EFFECTS ASSESSMENT</b>  |  |   |   |
| 17.0   | <b>Summary of Environmental Effects Assessment</b>  |  |   |   |
| 17.1   | Provide a table summarizing the following key information:<br>a) Potential environmental effects;<br>b) Proposed mitigation measures to address the effects identified above; and<br>c) Potential residual effects and the significance of the residual environmental effects.  | ---  | ---   | <a href="#">Appendix 2B</a><br><a href="#">Appendix 2C</a><br><a href="#">Appendix 2D</a> |
| 17.2   | Provide a table summarizing all key mitigation measures and commitments made by Benga Mining.   | ---  | ---   | <a href="#">Appendix 2B</a><br><a href="#">Appendix 2C</a><br><a href="#">Appendix 2D</a> |
| 18.0   | <b>MITIGATION, FOLLOW-UP AND MONITORING</b>   |  |   |   |
| 18.0   | <b>Developing Mitigation Measures and Determining Their Effectiveness Through Monitoring and Follow-Up</b>  |  |   |   |
| 18.1   | Provide the following information as outlined in the Guidelines:<br>a) Indicate what other technically and economically feasible mitigation measures were considered, in addition to the measures provided in the EIA, and explain why they were rejected. Justify any trade-offs between cost savings and effectiveness of the various forms of mitigation.  | <a href="#">Section A.7</a> (outlines potential mitigations not proposed due to technical or economic limitations)                 | ---   | ---   |
| 18.1   | b) Identify who is responsible for the implementation of the mitigation measures and the system of accountability.<br>c) Where mitigation measures are proposed to be implemented for which there is little experience or for which there is uncertainty regarding their effectiveness, clearly and concisely describe the potential risks and effects to the environment should those measures not be effective and, where appropriate, identify contingency measures.<br>d) Identify the interventions that pose risks to one or more of the components | <a href="#">Section A.11</a> (see Determining Effectiveness of Mitigation, Follow-up and Monitoring for each technical discipline) | ---   | ---   |

| <b>Table 1      January 13, 2016 CEAA Additional Information Requests for Benga Mining Limited (Benga Mining) Proposed Grassy Mountain Coal Project</b><br><b>Cross Reference (Concordance) Table to Location in the Integrated Application</b> |  |                              |                          |                             |
|---|--|------------------------------|--------------------------|-----------------------------|
| <b>IR No.</b>   | <b>Information Request</b>   | <b>Section</b>               | <b>Consultant Report</b> | <b>Appendix</b>             |
|   | and the measures and means planned to protect the environment.   |                              |                          |                             |
| 18.2  | Present a preliminary follow-up program, paying particular attention to any areas where scientific uncertainty exists in the prediction of effects (including, but not limited to, areas such as air quality, land and resource use, wildlife and aquatic environment).  | <a href="#">Section A.11</a> | ---                      | ---                         |
| 18.3  | Review all measures identified to mitigate potential adverse impacts on potential or established Aboriginal or treaty rights and ensure they are written as specific commitments that clearly describe how Benga Mining intends to implement them. In doing so, it is recommended to include all mitigation measures identified for the Project in a table format that can be updated as the process proceeds. | ---                          | ---                      | <a href="#">Appendix 2D</a> |

| Table 1B March 21, 2016 CEAA Additional Information Requests for Benga Mining Limited (Benga Mining) Proposed Grassy Mountain Coal Project<br>Cross Reference (Concordance) Table to Location in the Integrated Application |   |         |  |          |
|---|---|---------|--|----------|
| IR No.  | Information Request   | Section | Consultant Report  | Appendix |
| <b>FISH AND FISH HABITAT</b>  |   |         |  |          |
| <b>1.0</b>  | <b>Baseline Information</b>   |         |  |          |
| 1.0   | Describe the current state of fish populations in the project area, including the distribution of pure strain WSCT.   | ---     | CR #6 Aquatic Resources Addendum, <a href="#">Section 4.1.1.1</a><br>CR #6 Aquatic Resources Addendum, <a href="#">Appendix A1</a> , <a href="#">Sections 4.1.2 to 4.1.6</a>   | ---      |
| <b>2.0</b>  | <b>Regional Study Area</b>  |         |  |          |
| 2.0   | Include Daisy Creek in the aquatic assessment or provide a rationale explaining why Daisy Creek was not included in the assessment.   | ---     | <a href="#">Attachment 3, AIR #1</a>   | ---      |
| <b>3.0</b>  | <b>Mapping Fish Habitat</b>   |         |  |          |
| 3.0   | a) Discuss how Benga Mining has arrived at an understanding of habitat potential for the entire watercourse of Blairmore Creek based on two survey points.<br>b) Determine and map where spawning, nursery, rearing, food supply and migration habitats and over-wintering areas are in the local study area. | ---     | CR #6 Aquatic Resources Addendum, <a href="#">Appendix A1</a> , <a href="#">Section 3.0</a><br>CR #6 Aquatic Resources Addendum, <a href="#">Appendix A1</a> , <a href="#">Section 4.0</a><br>CR #6 Aquatic Resources Addendum, <a href="#">Appendix A2</a><br>CR #6 Aquatic Resources Addendum, <a href="#">Appendix A3</a><br><a href="#">Attachment 3, AIR #2</a> | ---      |
| <b>4.0</b>  | <b>Geomorphological Changes</b>   |         |  |          |
| 4.0   | a) Provide an assessment of any potential physical impacts to aquatic environments and water quality as a result of increased discharges to Blairmore Creek and other surface waters.<br>b) Describe how any potential impacts will be mitigated.   | ---     | CR #6 Aquatic Resources Addendum, <a href="#">Section 4.2.2</a><br>CR #6 Aquatic Resources Addendum, <a href="#">Section 4.2.4.1</a><br><a href="#">Attachment 3, AIR #3</a>   | ---      |

| Table 1B March 21, 2016 CEAA Additional Information Requests for Benga Mining Limited (Benga Mining) Proposed Grassy Mountain Coal Project<br>Cross Reference (Concordance) Table to Location in the Integrated Application |  |         |   |          |
|---|--|---------|---|----------|
| IR No.  | Information Request  | Section | Consultant Report   | Appendix |
| 5.0   | <b>Gold Creek and Blairmore Creek Tributaries</b>  |         |   |          |
| 5.0   | Identify the contribution that the tributaries have ( <i>i.e.</i> , habitat, water quality and quantity) with respect to fish populations in Gold and Blairmore Creeks.  | ---     | CR #6 Aquatic Resources Addendum, <a href="#">Section 4.1.1.1</a><br>CR #6 Aquatic Resources Addendum, <a href="#">Appendix A1, Section 3.0</a><br>CR #6 Aquatic Resources Addendum, <a href="#">Appendix A1, Section 4.0</a><br>CR #6 Aquatic Resources Addendum, <a href="#">Appendix A3</a><br>CR #5 | ---      |
| 6.0   | <b>In-Stream Flow Needs Model</b>  |         |   |          |
| 6.0   | Conduct field work, if necessary, to make the IFN model specific to the fish species in Gold and Blairmore Creek. Using these results, model how changes in water quantity in watercourses could impact the availability of fish habitat.  | ---     | CR #6 Aquatic Resources Addendum, <a href="#">Appendix A3</a>   | ---      |
| 7.0   | <b>Westslope Cutthroat Trout</b>   |         |   |          |
| 7.0   | Provide an analysis of the effects of the Project, describing mitigation including offsets, on the survival and recovery of WSCT, its residences and critical habitat. Include a discussion of how population and distribution objectives set out in Recovery Strategy and Action Plans would be affected. | ---     | CR #6 Aquatic Resources Addendum, <a href="#">Section 3.0</a><br>CR #6 Aquatic Resources Addendum, <a href="#">Section 4.0</a><br>CR #6 Aquatic Resources Addendum, <a href="#">Appendix A4</a><br><a href="#">Attachment 3, AIR #4</a>   | ---      |
| 8.0   | <b>Conceptual Offsetting Plan</b>  |         |   |          |
| 8.0   | Identify a conceptual offsetting plan that is economically and technically feasible that would mitigate predicted impacts to fish and fish habitat, including WSCT.  | ---     | CR #6 Aquatic Resources Addendum, <a href="#">Appendix A4</a>   | ---      |

| Table 1B March 21, 2016 CEEA Additional Information Requests for Benga Mining Limited (Benga Mining) Proposed Grassy Mountain Coal Project<br>Cross Reference (Concordance) Table to Location in the Integrated Application |  |                                  |  |          |
|---|--|----------------------------------|--|----------|
| IR No.  | Information Request  | Section                          | Consultant Report  | Appendix |
| 9.0   | <b>Mitigating Contaminants of Concern</b>  |                                  |  |          |
| 9.0   | a) For the variables that are modelled to exceed water quality guidelines in Gold Creek, Blairmore Creek, and Crowsnest River after proposed treatment in the saturated zones, provide other potential mitigation measures to prevent potential effects to fish and fish habitat.<br><br>b) Provide information as to the sources of these parameters within the mine plan and how concentrations could be controlled at source. | ---                              | <a href="#">CR #6 Aquatic Resources Addendum, Section 4.2.2.4</a><br><a href="#">CR #5</a>           | ---      |
| <b>ATMOSPHERIC ENVIRONMENT</b>  |  |                                  |  |          |
| 10.0  | <b>Changes to the Atmospheric Environment</b>  |                                  |  |          |
| 10.0  | Explain the inconsistencies in the number of 292 tonne and 254 tonne haul trucks in Table C1.4-1 and Table A3-3 and if necessary, update: <ol style="list-style-type: none"> <li>the tables accordingly; and</li> <li>the air quality modelling predictions.</li> </ol>  | ---                              | <a href="#">CR #1A, Appendix A, Table A3-3</a><br><a href="#">CR #1A, Appendix A, Section A.5.1.</a> | ---      |
| 11.0  | <b>Air Quality Model</b>   |                                  |  |          |
| 11.0  | Provide all input and control files used in the CALPUFF model to generate the air quality predictions presented in the EIA. All input and control files should be in a format that can be used directly into the CALPUFF model. Provide all output files in the raw CALPUFF format.  | ---                              | <a href="#">CR #1A, Appendix B, Section B.4.3</a>  | ---      |
| 12.0  | <b>Atmospheric Environment</b>   |                                  |  |          |
| 12.0  | a) Provide rationale for the assumed dust control efficiency of 80% for the haul roads.<br><br>b) Describe the planned watering frequency of the haul roads and the decrease in dust control efficiency as the haul roads dry.   | <a href="#">Section A.11.1.1</a> | <a href="#">CR #1A, Section 4.2.2</a><br><a href="#">CR #1A, Section 6.6</a>                         | ---      |
| 13.0  | <b>Cumulative Effects Assessment</b>   |                                  |  |          |
| 13.0  | Include increased highway and railway traffic due to the Project as part of the cumulative effects assessment for air quality or provide a rationale as to why Highway 3 traffic emissions will not increase over the life of the Project.   | ---                              | <a href="#">CR #1A, Section 4.7</a>  | ---      |



| <b>Table 1B      March 21, 2016 CEEA Additional Information Requests for Benga Mining Limited (Benga Mining) Proposed Grassy Mountain Coal Project</b><br><b>Cross Reference (Concordance) Table to Location in the Integrated Application</b> |   |             |  |                           |
|--|---|-------------|--|---------------------------|
| IR No.   | Information Request   | Section     | Consultant Report  | Appendix                  |
| <b>GROUND WATER AND SURFACE WATER</b>  |   |             |  |                           |
| <b>14.0</b>  | <b>Water Quality - Selenium</b>   |             |  |                           |
| 14.0   | a) Conduct toxicity tests on three or more algal species to better document the biological uptake relationship between the EF and the concentrations of Se and SO <sub>4</sub> .<br>b) Calculate the site-specific adjustment without the low Se concentration data to avoid the active preferential uptake effects in the adjustment calculation.<br>c) Conduct Se and SO <sub>4</sub> measurements on water and periphyton from aquatic habitat near the Project area to verify that the laboratory studies have applicability to this particular site. | ---         | CR #5, Section 2.2.2   | ---                       |
| <b>15.0</b>  | <b>Site-Specific Selenium Objective</b>   |             |  |                           |
| 15.0   | a) Confirm whether the site-specific Se objective was developed for total or dissolved Se.<br>b) If the site-specific Se objective was developed for total Se, explain why and how it was applied to dissolved Se concentrations.<br>c) If the site-specific Se objective was developed for dissolved Se, explain why and how it was applied to total Se concentrations.  | ---         | CR #5, Section 2.2.2<br>CR #5, Section 4.1.1.2<br>CR #5, Appendix A1 | ---                       |
| <b>16.0</b>  | <b>Surface Water Quality - Selenium</b>   |             |  |                           |
| 16.0   | a) Compare modelled Se concentrations against background Se concentrations and explain any differences.<br>b) Discuss if the Project will result in Se being deposited in waters frequented by fish.  | Section C.8 | CR #5, Section 4.1.1.2   | Appendix 10B, Section 8.0 |
| <b>17.0</b>  | <b>Water Quality Model</b>  |             |  |                           |
| 17.0   | a) Demonstrate how the water quality model: <ol style="list-style-type: none"> <li>considers chemical reactions within the anoxic saturated zones; and</li> <li>accounts for elevated concentrations of dissolved metals and other potential byproducts from the saturated zones.</li> </ol> b) Update the water quality model with adjusted predictions that explicitly consider reactions within the saturated zones and effluent from the saturated zones.   | ---         | ---  | Appendix 10B              |



| <b>Table 1B      March 21, 2016 CEAA Additional Information Requests for Benga Mining Limited (Benga Mining) Proposed Grassy Mountain Coal Project</b><br><b>Cross Reference (Concordance) Table to Location in the Integrated Application</b> |  |               |  |  |
|--|--|---------------|--|--|
| IR No.   | Information Request  | Section       | Consultant Report                                | Appendix   |
| 18.0   | <b>Selenium Treatment in Saturated Zones</b>   |               |  |  |
| 18.0   | a) Discuss the potential impacts associated with discharging anoxic water to Blairmore Creek from the saturated zones.<br>b) Discuss the associated mitigation measures that will be incorporated in order to address the potential impacts on water quality in Blairmore Creek.   | ---           | CR #5, Section 4.1.1                             | ---  |
| 19.0   | <b>Selenium Management</b>   |               |  |  |
| 19.0   | a) Discuss how Benga Mining will: <ol style="list-style-type: none"> <li>monitor the effectiveness of Se and nitrate removal within the saturated zones, and</li> <li>determine whether the introduction of another reactive reduced carbon source is necessary and where that will come from.</li> </ol> b) Describe how the residence time would be managed to ensure that the flow through the saturated zones will achieve the required residence time of one year or more for the attenuation of Se and nitrate loading respectively.<br>c) Provide details on alternate Se management plans or measures should the proposed method not work. | Section C.8.2 | CR #5, Section 5.0                               | ---  |
| 20.0   | <b>Water Management Plan</b>   |               |  |  |
| 20.0   | Regarding the saturated zone: <ol style="list-style-type: none"> <li>Discuss how hydrological extremes have been incorporated into the design and operation.</li> <li>Discuss what mitigation is available if residency times prove to be shorter than one year and water is unsuitable for discharge.</li> <li>Discuss the capacity of the saturated zone to hold water (in terms of volume and years of storage) in situations when discharge to the environment is not possible.</li> </ol>   | Section C.5   | ---  | ---  |
| 21.0   | <b>Seepage Management</b>  |               |  |  |
| 21.0   | a) Provide information regarding the quality of water seeping from the saturated zones and discuss potential mitigation measures to improve the quantity of seepage.<br>b) Provide a water seepage management plan and identify how seepage from the rock disposal area will be managed for closure.   | ---           | CR #5, Section 4.1.1.2<br>CR #5, Section 4.1.1.3 | Appendix 10A,<br>Section 5.0<br>Appendix 10A,<br>Section 6.0<br>Appendix 10C,<br>Section 3.2 |

| <b>Table 1B      March 21, 2016 CEAA Additional Information Requests for Benga Mining Limited (Benga Mining) Proposed Grassy Mountain Coal Project</b><br><b>Cross Reference (Concordance) Table to Location in the Integrated Application</b> |   |                |   |              |
|--|---|----------------|---|--------------|
| IR No.   | Information Request   | Section        | Consultant Report   | Appendix     |
| <b>22.0</b>  | <b>Water Quality Data</b>   |                |   |              |
| 22.0   | a) Describe any further sampling that is to occur in Gold Creek, Blairmore Creek, and Crowsnest River during the winter to characterize under-ice conditions prior to discharge.  | ---            | CR #5, Section 3.1.3.1<br>CR #5, Section 3.2.3  | ---          |
|  | b) If no further sampling is to occur, describe why and describe how current under-ice data is sufficient to understand water quality dynamics.   | ---            | ---   | ---          |
| <b>23.0</b>  | <b>Use of Existing Information</b>  |                |   |              |
| 23.0   | a) Describe how historical water quality data with detection limits above existing guidelines were used within the dataset.   | ---            | CR #5, Section 3.2.1  | ---          |
|  | b) Describe any QA/QC procedures that were applied to the historical dataset to ensure the data are applicable.   | ---            | CR #5, Section 3.1.1  | ---          |
|  | c) Describe whether, and if so, how the current baseline conditions and the historical dataset were combined into one dataset for comparison to modelled predictions.   | ---            | CR #5, Section 3.2 (historical and current baseline information and evaluated separately) | ---          |
| <b>24.0</b>  | <b>Water Quality Reference Sites</b>  |                |   |              |
| 24.0   | Provide information on suitable/proposed reference areas for Gold Creek, Blairmore Creek, and Crowsnest River.  | ---            | CR #5, Section 3.2.3.1<br>CR #6, Section 3.3.2.1  | ---          |
| <b>25.0</b>  | <b>Hydrological Modeling</b>  |                |   |              |
| 25.0   | Provide a rationale for the selection of the hydrological conditions provided in the EIA. Discuss how these conditions encompass the range of scenarios historically experienced in the region or projected to potentially occur in future. | ---            | ---   | Appendix 10A |
| <b>26.0</b>  | <b>Wastewater Disposal</b>  |                |   |              |
| 26.0   | a) Describe the location of the subsurface drainage system and the pathway connecting the subsurface drainage to surface waters.  | Section C.6.17 | ---   | ---          |
|  | b) Describe the level of treatment required prior to wastewater being released to the subsurface drainage system.   |                |   |              |

| <b>Table 1B March 21, 2016 CEAA Additional Information Requests for Benga Mining Limited (Benga Mining) Proposed Grassy Mountain Coal Project</b><br><b>Cross Reference (Concordance) Table to Location in the Integrated Application</b> |  |  |  |   |
|---|--|--|--|---|
| IR No.  | Information Request  | Section                                    | Consultant Report  | Appendix  |
| <b>27.0</b>   | <b>Effluent Quantity and Quality</b>   |  |  |   |
| 27.0  | a) Provide all water quality model inputs and outputs, including source concentrations.<br>b) Provide volumes of effluent to be discharged to Gold Creek and Blairmore Creek and the predicted effluent quality for all discharges, including surge ponds and saturated zones, prior to its release to the receiving environment.    | ---  | ---  | <a href="#">Appendix 10B</a> and its<br><a href="#">Appendix C</a> (water quality inputs/outputs)<br><a href="#">Appendix 10B</a> (effluent volumes and quality prior to release) |
| <b>28.0</b>   | <b>Metal Leaching and Acid Rock Drainage</b>   |  |  |   |
| 28.0  | a) Clarify whether the road construction material sourced from the pit was analysed for potential ML/ARD.  | ---  | ---  | <a href="#">Appendix 10A</a> ,<br><a href="#">Section 3.1.1</a><br><a href="#">Appendix F</a>   |
|   | b) Describe plans to implement a monitoring and management program for seepage and runoff from the road if construction material was not analyzed for ML/ARD.  | N/A, clarification provided in response a) | N/A, clarification provided in response a)                                   | N/A, clarification provided in response a)  |
|   | c) Describe how the proposed method of placing PAG and non-PAG materials will achieve thorough blending that is required to prevent ML/ARD.  | ---  | ---  | <a href="#">Appendix 10A</a> ,<br><a href="#">Section 5.4.3</a>   |
| <b>29.0</b>   | <b>Geochemical Characterization</b>  |  |  |   |
| 29.0  | a) Confirm whether the section on Site Seep Chemistry should refer to Figure 20 rather than Figure 19.<br>b) Update the list of Figures to include Figure 20   | ---  | ---  | <a href="#">Appendix 10A</a> ,<br><a href="#">Section 4.2.4</a> , including list of figures.  |
| <b>30.0</b>   | <b>Monitoring Groundwater Quality</b>  |  |  |   |
| 30.0  | a) Describe which measures will be undertaken in case the predicted groundwater values are different from the observed ones. Refer to question 18.1 of the Agency's letter dated January 13, 2016 for additional information on mitigation, follow-up and monitoring.<br>b) Describe what criteria will trigger mitigation measures. | ---  | <a href="#">CR #3, Section 7.1</a><br><a href="#">CR #3, Section 7.2</a>     | <a href="#">Appendix 10A</a>  |
| <b>31.0</b>   | <b>Groundwater Quality at Depth</b>  |  |  |   |
| 31.0  | Provide a discussion on the relevancy of the analytical results obtained for groundwater with respect to the groundwater quality that can be expected at depth.  | ---  | <a href="#">CR #3, Section 4.4.1</a><br><a href="#">CR #3, Section 4.4.2</a> | ---   |

| <b>Table 1B      March 21, 2016 CEAA Additional Information Requests for Benga Mining Limited (Benga Mining) Proposed Grassy Mountain Coal Project</b><br><b>Cross Reference (Concordance) Table to Location in the Integrated Application</b> |   |                       |   |          |
|--|---|-----------------------|---|----------|
| IR No.   | Information Request   | Section               | Consultant Report                         | Appendix |
| <b>32.0</b>  | <b>Mine Pit Dewatering</b>  |                       |   |          |
| 32.0   | Provide figures illustrating the characteristic cross sections of the proposed mine permit boundary showing groundwater levels and pit contours.  | ---                   | CR #3, Figures 4.2-5 to 4.2-8             | ---      |
| <b>33.0</b>  | <b>Base Flow Rates</b>  |                       |   |          |
| 33.0   | a) For Appendix C, Table 1 (BaseFlow Estimates), provide the assumed annual precipitation rate and the base flow rate for each of the tabled gauging stations and provide the overall base flow values for the modeled region normalized in mm/year/m <sup>2</sup> (or L/sec/km <sup>2</sup> ).<br><br>b) Provide the mathematical computation of the retained base flow rates for Gold Creek gauging station G2 and the Blairmore Creek gauging station BL-02 normalized in mm/year/m <sup>2</sup> or L/sec/km <sup>2</sup> .<br><br>c) Provide the numerical values of the final calibrated recharge rate in mm/year/m <sup>2</sup> for the upstream area of each gauging station considered in Table 1 and the overall recharge value for the whole modelled region. | ---                   | CR #3, Appendix C                         | ---      |
| <b>34.0</b>  | <b>Hydraulic Units</b>  |                       |   |          |
| 34.0   | a) Provide evidence to support the statement that test results should be representative of hydraulic conductivity parallel to bedding.<br><br>b) Provide a table or a figure with the considered/calibrated values for each model layer.  | ---                   | CR #3, Section 3.2.2<br>CR #3, Appendix C | ---      |
| <b>35.0</b>  | <b>Steady State Flow Model</b>  |                       |   |          |
| 35.0   | a) Provide spatial maps with depth to groundwater in the top model layer for the calibrated baseline case and End of Mine conditions.<br><br>b) Provide a discussion on the relevancy of the steady state flow approach in an area with such significant topographic relief.  | ---                   | CR #3, Appendix C                         | ---      |
| <b>GEOLOGY AND GEOCHEMISTRY</b>  |   |                       |   |          |
| <b>36.0</b>  | <b>Seismic Activity</b>   |                       |   |          |
| 36.0   | Discuss the potential for induced seismicity that could possibly result from fracking in the Project's vicinity.  | Attachment 2, IR #10. | ---                                       | ---      |

| Table 1B March 21, 2016 CEEA Additional Information Requests for Benga Mining Limited (Benga Mining) Proposed Grassy Mountain Coal Project<br>Cross Reference (Concordance) Table to Location in the Integrated Application |  |                                      |  |          |
|---|--|--------------------------------------|--|----------|
| IR No.  | Information Request  | Section                              | Consultant Report  | Appendix |
| <b>MIGRATORY BIRDS AND SPECIES AT RISK</b>  |  |                                      |  |          |
| <b>37.0</b>   | <b>Whitebark Pine</b>  |                                      |  |          |
| 37.0  | a) Provide a detailed assessment showing the abundance and distribution of whitebark pine and limber pine on the mine disturbance footprint area.<br>b) Provide the estimated number of trees and estimated area affected for each species.<br>c) Based upon the above information, provide the number of trees to be replaced/planted and area to be enhanced for each species. Numbers should be conservative to account for: the sensitivity of the species; limitations/challenges in success; and delay/lag before trees and habitat are restored.<br>d) Describe how Benga Mining will avoid, minimize and/or compensate for the destruction of candidate critical habitat for the whitebark pine. | ---                                  | <a href="#">CR #8, Appendix D</a><br><a href="#">CR #8, Section 3.2.1.1, Figures 3.2-2 and 3.2-3</a><br>Descriptions of whitebark pine and limber pine; maps depicting whitebark and limber pine occurrence in the RSA and LSA.<br><a href="#">CR #8, Section 4.2.6.3.1</a><br>(mitigations) | ---      |
| <b>38.0</b>   | <b>Little Brown Bat</b>  |                                      |  |          |
| 38.0  | a) Provide the number and locations of bat hibernacula in the Project Development Area (footprint plus disturbance buffer), and whether little brown bats are using these hibernacula.<br>b) Estimate the number of little brown bats that will be affected for each hibernacula disturbed/destroyed due to the Project.<br>c) Identify hibernacula near, but unaffected by, the Project to which Project-impacted little brown bats could relocate.<br>d) Identify mitigation measures for the destruction of little brown bat.   | <a href="#">Attachment 2, IR #14</a> | ---  | ---      |
| <b>39.0</b>   | <b>Wildlife Risk Assessment</b>  |                                      |  |          |
| 39.0  | a) Update the screening-level wildlife risk assessment to include other relevant routes of exposure, including waterbourne, for valued wildlife components.<br>b) Update the wildlife risk assessment to include additional waterbourne and other COCs, not previously considered, when assessing the aquatic exposure and other pathways.<br>c) Include COCs previously identified in water (nitrite, selenium, cobalt, cadmium, mercury and zinc) in the updated WRA.  | ---                                  | <a href="#">CR #12, Appendix H</a>   | ---      |

| <b>Table 1B March 21, 2016 CEAA Additional Information Requests for Benga Mining Limited (Benga Mining) Proposed Grassy Mountain Coal Project</b><br><b>Cross Reference (Concordance) Table to Location in the Integrated Application</b> |   |   |   |          |
|---|---|---|---|----------|
| IR No.  | Information Request   | Section   | Consultant Report   | Appendix |
|   | d) Complete Table H-7 for polycyclic aromatic hydrocarbon compounds using all available sources of information.<br>e) Update the wildlife risk assessment with updated TRVs.  |   |   |          |
| <b>40.0</b>   | <b>Species at Risk and Migratory Birds</b>  |   |   |          |
| 40.0  | a) Update the list of COCs identified in the wildlife risk assessment and describe which compounds have potential to bioaccumulate and biomagnify up the food chain. Include a description of the bioaccumulation and biomagnification pathways.<br>b) For compounds identified in a), update the wildlife risk assessment to include a determination of the impacts of exposure through diet to valued wildlife components.  | ---   | <a href="#">CR #12, Appendix H, Section 2.1 (COPCs)</a><br><a href="#">CR #12, Appendix H, Section 2.3 (exposure pathways)</a><br><a href="#">CR #12, Appendix H, Table H.3 (summary of pathways)</a>                   | ---      |
| <b>41.0</b>   | <b>Migratory Bird Mortality</b>   |   |   |          |
| 41.0  | a) Provide detail on the physical characteristics (size, volume, location, <i>etc.</i> ) regarding the surge ponds and saturated zones.<br>b) Describe the measures to limit wildlife interactions with these surge ponds and saturated zones.  | <a href="#">Section C.5.5</a> (physical characteristics of surge ponds)<br><a href="#">Section C.5.3.4.2</a> (saturated zones)<br><a href="#">Figures C.5.3-5 and C.5.3-6</a> | ---   | ---      |
|   | c) Describe the impact to migratory birds and wildlife coming in contact with these surge ponds and saturated zones including potential health risks.   | <a href="#">Section C.8</a> (mitigation measures)   | <a href="#">CR #9, Sections 5.5.3, 5.3.1.3, 5.3.1.4, 5.4.4, and 5.4.5</a> (impact of surge ponds [selenium] on migratory birds/wildlife)<br><a href="#">CR #9, Sections 7.1.4, 7.1.5, and 7.2</a> (mitigation measures) | ---      |
| <b>42.0</b>   | <b>Contaminants of Concern</b>  |   |   |          |
| 42.0  | Evaluate the potential effects of the Project on migratory birds and species at risk that are expected to inhabit, or pass through, the WLSA and the wildlife regional study area. Include a determination of significance of Project effects on migratory birds and species at risk. Include a summary of research conducted or considered, the COCs associated with coal mining activities, and the impact to wildlife from exposure to those COCs, with appropriate reference. | ---   | <a href="#">CR #9, Section 4.1</a><br><a href="#">CR #12, Appendix H</a>  | ---      |

| Table 1B March 21, 2016 CEAA Additional Information Requests for Benga Mining Limited (Benga Mining) Proposed Grassy Mountain Coal Project<br>Cross Reference (Concordance) Table to Location in the Integrated Application |   |   |  |          |
|---|---|---|--|----------|
| IR No.  | Information Request   | Section   | Consultant Report  | Appendix |
| <b>HUMAN HEALTH</b>   |   |   |  |          |
| 43.0  | <b>Human Health Risk Assessment</b>   |   |  |          |
| 43.0  | a) Provide mitigation strategies to address the potential for adverse human health effects given the predicted air quality exceedances at certain receptors.<br>b) Provide the Project contribution to air quality exceedances at receptor R6 along with the seasonal variation of this contribution.   | ---   | <a href="#">CR #12, Section 6.5</a> (mitigations)<br><a href="#">CR #12, Section 6.1</a> (Project contribution to R6 exceedance) | ---      |
| 44.0  | <b>Aboriginal Food Consumption</b>  |   |  |          |
| 44.0  | Survey potentially impacted Aboriginal groups to establish what country foods are being consumed and the rate of consumption.   | ---   | <a href="#">CR #12, Section 5.1.3.2</a>  | ---      |
| 45.0  | <b>Human Health Effects from Leachate</b>   |   |  |          |
| 45.0  | Discuss the potential for leachate from storage areas (stockpile and disposal areas) to affect groundwater and surface water, and the potential impacts on human health.  | ---   | <a href="#">CR #12, Section 5.1.1</a><br><a href="#">CR #3, Section 5.6</a><br><a href="#">CR #5, Section 4.6, Table 18</a>      | ---      |
| 46.0  | <b>Noise Impact</b>   |   |  |          |
| 46.0  | a) Update the quantitative noise assessment to include applicable adjustments for impulsive noise (i.e., blasting noise) and discuss the potential impacts on human health from exposure to predicted noise levels.<br>b) Provide a noise assessment for the construction, operation and decommissioning phases of the Project, or provide a rationale as to why these phases were not assessed separately. | ---   | <a href="#">CR #2A, Section 5.4.2</a>  | ---      |
| <b>NAVIGATION</b>   |   |   |  |          |
| 47.0  | <b>Navigation</b>   |   |  |          |
| 47.0  | a) Provide information on the navigability of waterways in the Project area and an assessment of the effects of watercourse alterations on navigation.<br>b) If appropriate, provide a complete Notice to the Minister of Transport for each affected waterway.   | <a href="#">Deemed not applicable by Transport Canada</a> | ---  | ---      |



| Table 1B March 21, 2016 CEAA Additional Information Requests for Benga Mining Limited (Benga Mining) Proposed Grassy Mountain Coal Project<br>Cross Reference (Concordance) Table to Location in the Integrated Application |  |                              |  |          |
|---|--|------------------------------|--|----------|
| IR No.  | Information Request  | Section                      | Consultant Report  | Appendix |
| ATMOSPHERIC ENVIRONMENT   |  |                              |  |          |
| 48.0  | Greenhouse Gases   |                              |  |          |
| 48.0  | a) Provide an estimate of the direct greenhouse gas emissions associated with all phases of the Project, as well as any mitigation measures proposed to minimize greenhouse gas emissions. This information is to be presented by individual pollutant and summarized in carbon dioxide equivalent units (CO <sub>2</sub> e) per year. | Section C.9 (GHG Management) | CR #1A, Section 4.3 (GHG emissions)<br>CR #1A, Section 6.6 (mitigations) | ---      |
|   | b) Provide an estimate of the Project's contribution to provincial and national greenhouse gas emissions.  | ---                          | CR #1A, Section 4.3 (GHG emissions)                                      | ---      |
|   | c) Provide an analysis of the predicted greenhouse gas emissions of the proposed Project in combination with other past, present and reasonably foreseeable projects should also be included in the cumulative effects assessment.   | ---                          | CR #1A, Section 6.6, Table 6.5-1 (row 12 Greenhouse Gas)                 | ---      |