newgold™ Rainy River Project

RAINY RIVER PROJECT

PART V- SEDIMENT PONDOPERATION, MAINTENANCE AND SURVEILLANCE MANUAL WATER MANAGEMENT STRUCTURES

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1.0 Regulatory Requirement

This document is consistent with the New Gold Tailings, Heap Leach and Waste Rock Facilities Management Policy and was prepared pursuant to the MAC guidelines for *Developing an Operation, Maintenance and Surveillance Manual for Tailings and Water Management Facilities* (MAC, 2011).

The following is a list of permits that this section of the OMS complies with:

- LRIA-FF-2017-02: Sediment Ponds 1 and 2

2.0 FACILITY DESCRIPTIONS

Water treatment is provided by the following;

- Water Treatment Plant, Water Discharge Pond (WDP) and the Constructed wetland – (CW); and
- Sediment ponds 1 and 2.

Sedimentation ponds have been designed to allow for the settlement of total suspended solids present in the non-contact runoff or effluent prior to discharge to the environment. Sediment Ponds #1 and #2 receive runoff and seepage from the West Mine Rock Stockpile (WMRS). The Water Discharge Pond (WDP) and Constructed Wetland receive discharge water from the WMP. The constructed wetland is the primary and priority discharge location from the WMP (to mitigate flow reductions in the Pinewood River) ahead of discharging to the Pinewood River downstream of McCallum Creek.

2.1.1 Sediment Ponds 1 & 2

Sediment Ponds #1 and #2 collect seepage and runoff from the West Mine Rock Stockpile (WMRS) to allow for settlement of Total Suspended Solids (TSS). The sediment ponds have been designed to provide a 12-day hydraulic retention time. Sediment Pond #1 will also receive

overflow water from the West Creek Overflow Weir during large storm events. Critical to the function of the sediment ponds is progressive reclamation. The ponds have been designed to meet the retention time objectives for Year 3 of mine operations. Further details on design are provided in the following documents:

Table 2-1; Sediment Ponds 1 and 2 Design Detail Documents

Document Title	**Reference**
LAKES AND RIVERS IMPROVEMENT ACT WORK PERMIT APPLICATION SUPPORT DOCUMENT SEDIMENT PONDS	RRP-GEO-LRIA-012 R1
As-built Report	TBD
Drawing Title	**New Gold Document Number**
Temporary Sedimentation Pond Plan and Details	3098004-004430-A1-D70-0002
Sediment Pond #2 – Plan, Cross Sections, and Details	3098004-004440-A1-D70-0002

After 2018, progressive rehabilitation would be required to reduce the sediment load on the ponds, or the ponds could be increased in size. After 3 years of mine operations, a better estimate of sediment loading from the stockpile area should be available to adequately design for additional area as required.

Seepage collection ditches will be constructed around the Overburden and NPAG stockpiles to convey runoff to the sediment ponds. The ditches will be constructed to minimize erosion protection requirements where practically possible. Flows may also be directed to the ponds using road side ditches.

Good engineering practices for placement, sediment and erosion control will be adopted for the management of the overburden pile to help reduce the sediment load and increase the chance that settling alone (as opposed to the addition of coagulants and flocculants) can be used for settling out the TSS. These practices include pre-settling ponds that are regularly cleaned out, construction of ditches with appropriate slopes, maintenance of the ditches, and progressive re-vegetation of the overburden stockpile.

2.2 Instrumentation

2.2.1 Dam Safety

Instrumentation has been and will be installed during construction. Instrumentation will include instrumented dam sections that will monitor dam foundation and clay fill pore pressures to infer consolidation characteristics, as well as monitor any movement of dam fill due to deformation. Each dam instrumentation section will include: standpipe(s), a settlement plate, slope inclinometer(s), survey pins/monuments, and a terminal arrangement with data logger and vibrating wire piezometers.

Following construction, the instrumentation will remain for dam monitoring purposes. A detailed report containing the proposed locations, usage, and analysis of all instrumentation is provided in the *Geotechnical Monitoring Plan* (Amec Foster Wheeler, 2016b). The design details for the installed or proposed dam instrumentation is summarized in Table 4-14. The design information provided in Table 4-14 will be confirmed and updated as may be required following development of the As-Built drawings.

Table 2-2; Dam Instrumentation Summary

Facility		Dam Instrumentation							
		Slope Stability			Foundation Consolidation		Phreatic Level and Seepage		
	Section	Slope Inclinometers	Survey Pins	Survey Monuments	Vibrating Wire Piezometers	Settlement Plates	Vibrating Wire Piezometers	Standpipe Piezometers	Pond Level Gauge
	(Sta.)	(no.)	(no.)	(no.)	(no.)	(no.)	(no.)	(no.)	(type)
TMA North	3+300	0		0	2	1	1	2	
	Mass array				142				
TMA South	1+000				2				
	1+380				2	1	1	1	
	1+450	2		2	4	2	1	2	
	1+600	1			4	2	1	1	
	2+200	2		2	4	2	1	2	
	2+350	1			4	2	1	1	TBD
	Mass array				176				
TMA West	0+300			0	1		1		
	0+460	2		0	5		2	1	
	1+450	0	35	0	0	1		0	
	1+500	2		0	4	0	3	0	
	Mass array				82				
TMA Start-up Cell	0+400				2				
	1+000				2				TBD
	Mass array				88				
WMP Dam 1			16						- Staff gauge
WMP Dam 2	0+950	1	34	0	2	0	2	2	- Survey stakes
WMP Dam 3	0+300	0	17	0	1	0	1	2	
	0+500	1		0	2	1	4	1	
Mine Rock Pond	0+220	1		2	2	1	1	4	- Staff gauge
Clark Creek									- Staff gauge
Teeple Road									- Staff gauge
Stockpile Pond	0+125	1	8	0	1	0	1	2	- Staff gauge
West Creek	0+291				2			2	
	0+320	2	2						- Staff gauge
	0+340	2	2		2	1	1		
Water Discharge Pond									TBD
Constructed Wetlands									
- Pond A									TBD
- Pond B									TBD
- Pond C									TBD
- Pond D									TBD
- Pond E									TBD
Sediment Pond #1									TBD
Sediment Pond #2									TBD
Temporary Sediment Pond									TBD

Notes:

1) Survey pins installed at 100 m centres along 3-5 lengthwise lines (crest, toes, etc.) Quantities are total for each dam

2) TMA Dams feature mass array of VWP instruments installed in grids within the dam foundation. Installation of these instruments is currently on-going

In addition to the instrumentation described above, the TMA dams are equipped with an additional suite of vibrating wire piezometers (VWPs) to provide enhanced monitoring resolution during construction. A total of 524 VWPs were installed in the TMA dam foundations, arranged in a grid pattern, and managed with a remote wireless data acquisition and management system.

Instrumentation associated with the management of the dams is being managed through a software system that includes integration with data loggers and data storage and is configured such that alarms for alert levels are defined and available. The software routinely generates reports and if trigger levels are exceeded sends out alarm notifications.

2.2.2 Other instrumentation

Additional instrumentation to support the OMS manual and management of water includes;

- Densometer on the tailings pipeline;
- Flow meters on the water management pipelines including from the Pinewood River, tailings reclaim lines, MPR line and freshwater line from the WMP and
- Pressure transducers in the WMP, Clark/Teeple Ponds.

This instrumentation provides continuous recording, which is collected during routine inspections and included.

2.3 Regulatory Requirements

Regulatory requirements, permits and authorizations are summarized in section 1.1. Key approvals include the Federal and Provincial Environmental Assessment conditions and commitments and permits including those issued pursuant to the LRIA and EPA. Additional legislation to be considered in implementing the OMS manual includes the MMER and various Ontario regulations including waste management.

No direct discharges are intended from any of the structures described in this section except the WMP which is described in sections 4 and 5. Seepage will be collected and pumped back from the WMP and TMA cells. Subsequent to this revision and LRIA approvals, additional details for the WDP, CW and sediment ponds discharges will be developed.

3.0 OPERATIONS

The overall operational objectives of the TMA and associated dams and facilities are to dispose and store the tailings and to manage all site water in a safe, economical and environmentally responsible manner. This section defines operating standards in accordance with design criteria and regulatory requirements specified in section 4.

3.1.1 Sediment Ponds 1 and 2

Sediment ponds are designed to provide a 12-day hydraulic retention time for all events up to and including the 25-year return period, 24-hour storm.

Sediment Pond #1 (Drawing 3098004-004430-A1-D70-0002)

- Collects runoff from the overburden stockpile;
- Will also receive additional inflow from overflow from West Creek Diversion during storm events large than the 25 year 24-hour storm event;
- The low flow outlet is designed to achieve the required retention time for the 25-year 24-hour storm event; and
- To prevent dam overtopping emergency spillway is designed for the 100-year storm event discharging to the West Creek Diversion Channel.

Sediment Pond #2 (Drawing 3098004-004440-A1-D70-0002)

- Collects runoff from the west mine rock pile (Non-Potentially Acid Generating [NPAG]) and is closer to the Pinewood River;
- The low flow outlet is designed to achieve the required retention time for the 25-year 24-hour storm event; and
- To prevent dam overtopping the high flow spillway is designed for the Regional Storm Event (Timmins storm event), discharging directly to the Pinewood River.

3.2 Environmental Protection

The Environmental Department has oversight over the EMS which contains tailings operations related environmental aspects including:

- Fugitive and point source dust emissions;
- Hydrocarbon Spills and Leaks;
- Pipeline Rupture and Leaks;
- Surface and ground water quantity and quality; and
- Wildlife management (including species at risk).

An environmental aspect register is a comprehensive inventory of tailings operations activities, environment aspects, assessment of risk and identification of controls. Tailings personnel have responsibility to implement and maintain the controls including monitoring and inspection. Refer to the Environment Department for the environmental aspect register (in prep) and environmental related procedures.

As outlined in orientation training, it is every RRM employee's responsibility to report a suspected spill or uncontrolled release event to their supervisor. This includes suspicious flows of water out of the area, escaping tailings, etc. The sooner appropriate persons can begin to correct a situation, the less likely it is that severe impacts will follow.

Table 5-3 provides a summary of the MECP effluent discharge limits that must be met to discharge from the WMP.

Table 3-1; MECP Effluent Discharge Limits from the WMP

Constructed Wetland Final Discharge and Water Management Pond Pipeline Discharge (to the Pinewood River) as stated in MECP ECA 5178-9TUPD9		
Effluent Parameter	**Daily Maximum Concentration (mg/l)**	**Monthly Average (mg/l)**
Cadmium	-	0.0010

Cobalt	-	0.0044
CBOD5	-	25.0
E.coli	-	100/100ml geometric mean density
Total Suspended Solids	30	15
Total Phosphorus	-	0.10
Cyanide (total)	0.1	0.05
Cyanide (free)	0.02	0.01
Total Arsenic	0.034	0.017
Total Copper*	0.028	0.014
Total Nickel	0.094	0.047
Total Lead*	0.030	0.015
Total Zinc*	0.348	0.174
Un-ionized Ammonia	0.08	0.04
Acute Toxicity (Rainbow Trout and Daphnia Magna)	Non-acutely lethal (not greater than 50% mortality in undiluted effluent)	
pH of the effluent maintained between 6.0 to 9.5, inclusive, at all times		

Notes:

1. *Proposed effluent criteria for Total Copper, Total Lead, and Total Zinc are based on a hardness of 200 mg/L CaCO3. In the event that water quality sampling indicates that 75th percentile hardness concentrations are less than 200 mg/L CaCO3, the effluent limits may be changed by the District Manager in writing, consistent with achieving no impairment for receiving waters.
2. Additional effluent limits for sediments 1&2 are stated in MECP ECA 5178-9TUPD9
3. The effluent discharge rate from the Constructed Wetland Final Discharge and the Water Management Pond Pipeline Discharge such that at all times the ratio of the combined flow rate of these effluents to the flow rate of the receiving surface water (Pinewood River) is less than or equal to 1:1 (i.e. the cumulative flow rate of the effluent must be less than or equal to the flow rate of the receiving surface water).
4. Prior to commencing Operations Phase discharges (Constructed Wetland Final Discharge, Water Management Pond Pipeline Discharge, Sediment Pond #1, and Sediment Pond #2), the method for determining daily effluent to receiver flow mixing ratios shall be approved by the District Manager.
5. For sampling frequencies and full parameter list refer to MECP ECA 5178-9TUPD9; sampling frequency varies from thrice weekly to quarterly depending on the parameter

3.3 Reporting Requirements

Reporting is sub-divided as routine, planned reports of defined frequency, and those that are non-routine i.e., event driven.

Routine

- Submission of asbuilts within 3 months of construction for WMP, TMA, MRP and sediment ponds 1 and 2
- Monthly monitoring report including a summary of all monitoring data collective, all non routine calibration/maintenance procedures, tabulation and description of any bypass/upset conditions
- Annual reporting to MECP on March 31 for the previous year, a works performance report and a surface water monitoring report
- Quarterly electronic effluent monitoring reports to ECCC
- Annual electronic effluent monitoring report and environmental effects monitoring reports to ECCC by March 31

Non-routine

- Report all spills as defined in the Environmental Protection Act immediately to spills action centre SAC, follow New Gold Incident Reporting Guidelines and follow up in writing to MECP within 10 days describing the cause and discovery of the spill or loss, clean-up and recovery measures taken, preventative measures to be taken and schedule of implementation
- Any observation of sheen/foam/settable solids within the works report immediately to (SAC) immediately and written reporting within 7 days
- Any exceedance of effluent limits report to SAC immediately, written confirmation to MECP within 7 days
- If acute toxicity tests fail, within 15 days report in writing to MECP with the cause and remedial actions proposed/implemented

- Notify ECCC immediate if MMER Sch 4 limits are exceeded, pH is outside 6-9.5 range or if the effluent is acutely lethal with a written report within 30 days

Records are retained consistent with CEAA condition 11 for a minimum of 25 years or until decommissioning ends, whichever is longer and kept locally. This exceeds the ECA permit requirement of 3 years. Records include place/date/time of sampling, dates and analysis performed, analytical techniques used, names of persons collected/analyzing sampling and results of analysis.

An Operations Report will be prepared by the Mill Manager or designate. The report will include metrics and information collected as part of normal operation. Examples of information contained in the Operations report include:

- Total monthly tailings deposition tonnage and slurry water volume;
- Total monthly reclaim volume;
- Pond level and freeboard;
- Updated water balance;
- Water quality results; and
- Intake / Discharge quantities.

Each of the regulatory approval requirements related to the construction, operation and eventual reclamation of the Site have specific compliance reporting requirements with defined deadlines or reporting periodicity. In general, the reporting includes:

- Operation, Maintenance and Surveillance Plan(s) for dams, water management (water quality) and air/noise emissions;
- Emergency Preparedness Plan(s);
- As-Built Drawings and related Construction Reports;
- Dam Safety Inspection and Review Reports
- Environmental Monitoring Plans; and
- Environmental Monitoring and Performance Reports.

The environmental approvals and permits received from the government that are maintained by the New Gold Environmental Department should be referred to for details of monitoring, inspection and reporting requirements.

In addition, the New Gold Environmental Department should be notified of any proposed major modification to RRM facilities, in order that they can liaise with the appropriate government ministries to determine if additional approvals or amendments to existing approvals are required.

4.0 MAINTENANCE

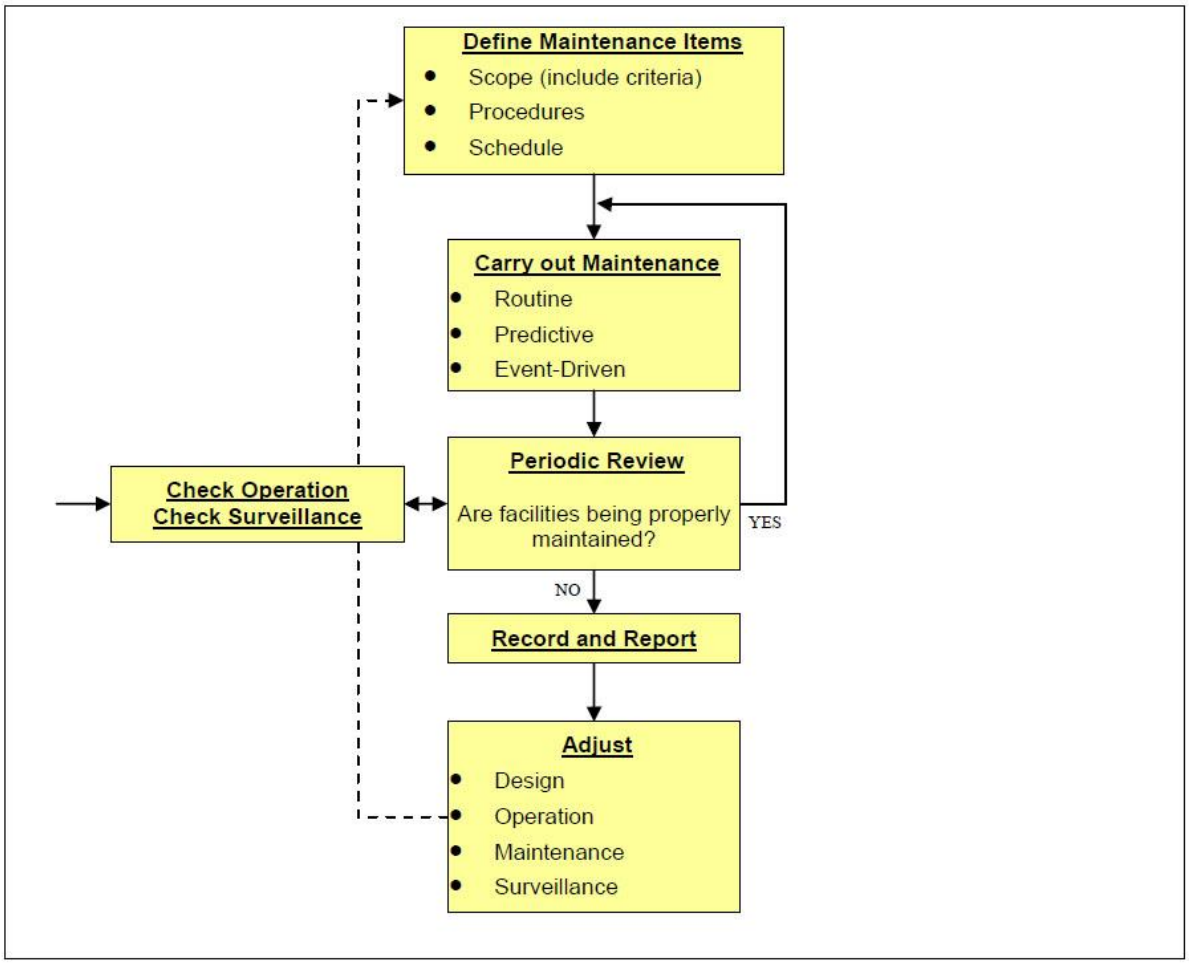
The following periodic maintenance is required:

1. Maintain the tailings and reclaim pumps and associated lines and containment;
2. Clear debris, snow and ice which may block flow through the decant facility or emergency spillways;
3. Maintain water management structures including spillways, ditches and diversions;
4. Maintain equipment, power and water lines, and instrumentation;
5. Repair any deficiencies as noted in the Dam Safety Inspections (DSI); and
6. Reconstruct the support for tailings discharge pipelines wherever washouts occur.

Maintenance records are retained by maintenance personnel performing the work in accordance with the procedures described in this document. Timing of maintenance actions for unusual conditions should be based on specific recommendations from surveillance findings. Scope and time frames for routine maintenance activities are determined and scheduled by the Maintenance Department and based on manufacturer's recommendations and best practices.

The maintenance flowchart is illustrated in Figure 6-1.

Figure 4-1; Maintenance Flow Chart



4.1 Routine and Predictive Maintenance

Routine and predictive maintenance includes removal of vegetation, beaver dams, ice blockage or sediment accumulation that would otherwise affect the performance of a structure when required.

4.2 Maintenance and Emergency Preparedness

A weekly table-top exercise will be conducted with the pump management team to ensure that crews are intimately familiar with the operational strategies for a broad range of operating and emergency scenarios. These table tops will be documented and New Gold management will ensure that any ongoing lessons learned from day-to-day operation are captured including the updating of any corresponding plans, maps, flowsheets or procedures.

The maintenance of pumps is the responsibility of New Gold and maintenance records are required to be maintained. Each installation requires to be equipped with spill pan, spill kits and the necessary signage. Changes to pumping configurations, ditching, piping or operating parameters need to be approved by the New Gold Mill Manager, the New Gold Maintenance Manager and the New Gold Environmental Manager, during normal working hours. This is particularly the case if splash pads need to be altered in any way. In an emergency call out (after hours), the Managers or their alternate, will provide direction in consultation with the New Gold Environmental Department.

During depositing of tailings the above-mentioned crews are required to complete their inspections daily. Reporting is to be escalated to hourly observations if a rainfall event is escalating and the Cell 2 level is within 200 mm of the intermediate fill elevation of 363.2 masl. The general manager can then decide whether to provide additional surveillance resources in the case where additional duties including maintenance and operation of the Cell 2 dewatering pumps is required to be performed by the allocated crews.

A summary report titled " TMA Cell 2 Water Levels " is circulated each morning at 9 a.m. to summarize the measured water and tailings levels as of 4 p.m. the day prior. This

report is prepared and circulated by the mill superintendent or his alternate. The purpose of the report is to highlight trend data for Cell 2.

Fundamental to the successful operation of the ponds and pumping strategy is a timely reaction to rainfall events, and ensuring that pumps come 'on line' or are taken 'off line' as design trigger levels are reached.

4.2.1 Dams

The following are examples of specific maintenance activities:

- Regularly check diversion ditches, spillways and culverts for accumulation of debris or sediment, or any other form of blockage including ice, and remove if required;
- Visually inspect diversions, spillways, seepage collection sumps, dams and all ditches for cracking, bulging, slumping, and any other indications of slope movement (note, any indications of slope movement shall be reported to a qualified geotechnical engineer);
- Re-grade the dam crest, as required, to prevent local ponding and direct surface runoff towards the pond;
- Repair erosion gullies, local slumps or slides in the dam face, diversion ditches or spillway channels; and
- Regularly check diversion ditches for accumulation of debris or sediment, or any other forms of blockage, and remove if required.
- If annual survey determines necessary, correct dam crest, overflow spill way and diversion channel invert irregularities to avoid concentrated runoff.

4.2.2 Ditches and spillways

Ditch maintenance includes replacement or enhancement of erosion protection to prevent sediment generation or sloughing of slopes, as required.

4.2.3 Geotechnical and Water Monitoring Instrumentation

Instrumentation is calibrated by the manufacturer prior to shipment. Calibration certificates will be maintained by maintenance department. Following instrument installation, initial reading procedures will be followed. Subsequent calibration will follow manufacturer's recommendations.

Malfunctioning or damaged instruments may require repair or replacement per manufacturer guidelines or approved procedure. In the event of replacement of dam instrumentation, several overlapping readings of the old and new instrument are required to ensure continuity of the data records.

4.2.4 Pumping Systems and Pipelines

Maintenance of the tailing delivery, water recirculation systems and seepage pumps will include:

- Perform regular performance tests of the Pinewood Pumphouse pumps and inspections of pump fish screens to remove any debris;
- Perform regular performance tests on seepage pond pumps
- Perform annual calibration and maintenance as required on flow meters;
- Perform regular non-destructive testing appropriate for components of the tailings delivery system, including for example, periodic measurement of pipeline thickness to identify areas of wear and to schedule pipeline replacement if necessary and repair liners as required;
- Replace pipe work, bends and fitting components as required;
- Remove accumulated debris from valves, reducers and off takes;
- Carry out maintenance as recommended by fitting and valve suppliers;
- Regularly inspect major wear components;
- Maintain emergency dump ponds in a dewatered/empty state; and
- Maintain and replace system instrumentation as required.

4.2.5 Mobile Equipment

Mobile equipment is maintained on the basis of a planned reliability program and as otherwise required. Equipment in question includes:

- Dozers;
- Excavators;
- Water truck;
- Pickup trucks;
- Mobile crane;
- Flatbed and picker truck; and
- Replacement of mobile equipment as required.

4.3 Event-Driven Maintenance

In the event of unusual conditions or incidents that require immediate maintenance actions but are not considered an emergency, repairs and replacement of facility components are made as required and activities are documented. RRM staff will provide a means to assess event driven maintenance needs through response action planning. Response planning is based on risk prioritization, maintenance crew mobilization or “call out” procedures, required repairs and replacement material availability. Event driven maintenance actions will follow applicable safety and performance procedures. Normal documentation and maintenance records will be maintained as a result of any event driven maintenance actions. Unusual conditions that require maintenance are also communicated to maintenance staff as they occur.

4.3.1 Pipeline Leaks or Breaks

In the event of a pipeline leak or break the system in question is de-energized and repaired as follows:

- Inspect entire pipeline;

- Repair or replace affected components;
- Perform opportune and scheduled maintenance;
- Repair any collateral damage caused by a leak or break;
- Collect any released tailings and place in the tailings impoundment;
- Reclaim any disturbed areas; and
- Follow any spill reporting that may be required pending type of spill and following documentation procedures.

4.3.2 Earthquake Occurrence

Following an earthquake, the following are undertaken:

- Inspect dam and beach areas for sign of distress due to deformation;
- Inspect dam for signs of liquefaction (e.g., local sand boils, etc.);
- Measure freeboard for compliance with design requirements;
- Inspect toe area of dam for signs of deformation or piping of fines;
- Inspect diversions, ditches and spillways for sign of slumping or changes in geometry;
- Inspect seepage collection areas; and
- Collect instrumentation data and submit to EOR for analysis.

4.3.3 Flood Event

Following extreme storms (as defined in section 7) the following are undertaken:

- Measure freeboard for compliance with design requirements;
- Inspect dam, diversions, ditches, spillways and diversions for signs of excessive erosion and repair if required;

- Inspect seepage return system for adequacy; and
- Implement appropriate response based on observations/measurements as defined in this manual.

4.4 Reporting Requirements

Maintenance information will be communicated internally through formal and informal meetings, interaction between various levels of the organization (department and/or crew meetings), through information posted at the site and through this OMS Manual.

Communications with applicable contractors involved in tailings management will be conducted daily and weekly during tailings activity meetings, as appropriate. All employees and contractors are encouraged to communicate openly with site management about operational conditions requiring maintenance and reporting any significant observations such as event-driven maintenance or any maintenance requirements that exceed expected norms.

Equipment logs and manuals will be maintained for reference and use by responsible staff.

Maintenance diaries and logs shall be maintained and accessible for review by other parties.

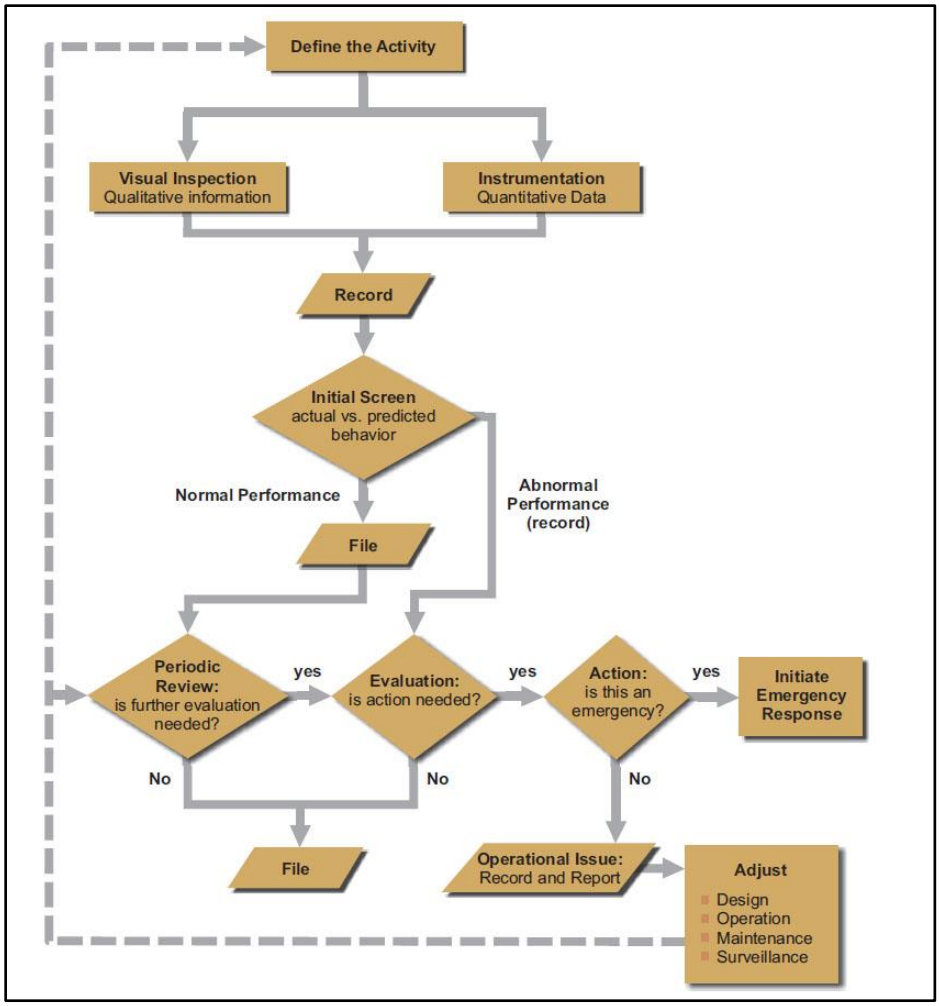
5.0 DAM SAFETY AND SURVEILLANCE

The RRM tailings and water management surveillance activities involve inspection and monitoring of the operation, structural integrity and safety of a facility. Regular review of surveillance information can provide an early indication of performance trends that, although within specifications, warrant further evaluation or action. The objectives of our surveillance program are as follows:

- Monitoring the operation, safety and environmental performance of tailings and water management facilities;
- Promptly identifying and evaluating deviations from expected behavior that affect operational safety, structural integrity and environmental performance of the facility; and
- Reporting significant observations for response.

The flow chat for surveillance is shown in Figure 7-1. Surveillance is undertaken in two primary methods – visual inspection and reading of instruments. Results of these qualitative and quantitative observations are compared to the expected performance of the TMA and water management facilities. If observations are within the expected range or performance, the results of the surveillance are simply recorded. If observations are outside the expected range, further evaluation is completed to determine if remedial action is necessary. If necessary, this action is taken and may range from a minor adjustment to operational procedures to initiation of emergency response, depending on the severity and nature of the deviation from expected performance.

Figure 5-1; Surveillance Flow Chart


Define the Activity
Visual Inspection
Qualitative information
Instrumentation
Quantitative Data
Record
Initial Screen
actual vs. predicted
behavior
Normal Performance
Abnormal
Performance
(record)
File
Periodic
Review:
is further evaluation
needed?
yes
Evaluation:
is action needed?
yes
Action:
is this an
emergency?
yes
Initiate
Emergency
Response
No
No
No
File
Operational Issue:
Record and Report
Adjust
Design
Operation
Maintenance
Surveillance

5.1 Surveillance and Inspections by Mine, Mill and Environment Operations Staff

The purpose of the surveillance program is to identify and classify problems and/or unsafe conditions that are visually evident. Visual inspections are an integral part of proper maintenance and performance of monitoring programs for the TMA and water management facilities. Failure to correct identified maintenance and repair items, or potential adverse behaviour, could result in unsafe conditions or lead to a failure of operating systems or cause an adverse environmental effect.

The surveillance program will consist of making regular observations relating to:

- The conditions and performance of the dams including indications of cracking, bulging, depressions, sinkholes, vegetation, surface erosion and seepage;
- Water levels and pump intake zones;
- Function of ancillary hydraulic structures (diversions, spillways, pipelines etc.);
- Discharge pipeline operations and tailings beach development; and
- Total facility performance.

During inspections, observations will be made at the upstream slope, crest and downstream slope with respect to signs of erosion, scouring, cracking, settlement, deformation, and any instability and abnormality. Seepage rates will be visually estimated and recorded on the inspection forms. Changes in the seepage rate or clarity (i.e., turbidity) require immediate reporting to the Engineer-of-Record.

5.1.1 Daily Inspections

During first filling of all dams except the TMA dams Surveillance records will be maintained in logs at site and submitted to the EOR for review daily and on a monthly basis thereafter, or more frequently as warranted. Any abnormal behaviour including slope slumping, erosion of crest settlement will be reported immediately to the Engineer-of-Record.

Routine daily visual inspections of critical dams (TMA, WMP and MRP), spillways, pipelines, pipeline containment and pumping infrastructure will be carried out on an on-going basis to confirm normal operations and identify unusual or anomalous conditions such as pipeline leaks, pump intake blockages, etc. All active pipelines will be inspected twice per 12 h shift, consistent with EA conditions.

Daily inspection sheets and provided in Appendix F.

5.1.2 Weekly Inspections

Physical inspections of the TMA, process water, water treatment and diversion dams will be conducted on a weekly basis. The weekly inspections will include those discussed in Section 7.1.1 and the following tasks:

- Photographic record of key features;
- Physical inspection of dams, dykes, diversion, ditches and spillways:
    - Indicating and reporting any seepage and erosion.
- Pond levels and freeboard:
    - Additional monitoring maybe required during spring freshet of the dams.

Weekly inspection sheets and SOPs are provided in Appendix F. All weekly inspections will be documented in a report and will be compiled as part of the annual DSI (Section 7.4).

5.1.3 Other Inspections

5.2 Inspection Required After an Unusual Event

Several potential failure modes exist for the various tailings and water management and water diversion storage facilities. These potential failure modes, along with likely triggers, observable visual and instrumentation indicators of the failure mode are presented in Table 9-1. Special inspections will be carried out immediately if any of the following events occur:

- Events such as an earthquake, large rainfall (greater than 1:2 year rainfall (51mm)) or large snowfall/snowpack;
- Operating events such as rupture of a pipeline, particularly if on the slope or crest of the dam, sudden loss of pond water, sudden rapid rise of pond water;
- Observations such as cracks, excessive settlements, sinkholes, large slope or foundation deformations, increased seepage, turbidity of seepage water; and
- Instrument readings that deviate from historical trends, or are within “alert” action levels (e.g., trigger levels).

Special inspections after unusual events are necessary as summarized in Tables 7-1 to evaluate whether there has been any damage requiring correction, any safety measures or special operating procedures that need to be implemented, or if there is a need to initiate emergency procedures as described in Section 9.0.

Table 5-1; Maintenance Requirements following an Unusual Event

Unusual Event	Post – Event Inspection/Surveillance
Earthquakes	Carry out a detailed walkover of all dam structures, including crests, downstream and upstream (visible) slopes and dam toes, and all spillways, looking for signs of

Unusual Event	Post – Event Inspection/Surveillance
	cracks, bulging, settlement and/or other deformations. Look for and note any changes in seepage, particularly with respect to the rate of seepage flows at dam slopes and seepage clarity. Read all piezometers. Inspect downstream toes of dams for sand boils and dam slopes for sinkholes. Inspect ponds upstream of the dams looking for 'whirlpools'. Inspect all pump stations and pipelines. Discuss findings with the Dam Safety Inspector.
Rapid snowmelt and/or heavy rainstorms exceeding a 1:2 year rainfall (51 mm)	Inspect the (visible) slopes and the crests of all the tailings dams looking for areas of concentrated runoff and erosion. Make note of saturated ground/soft ground conditions at dam slopes and toes. Examine dam slopes for indications of localized slumping/instability. Inspect all pump stations and pipelines. Check the water levels in all ponds/reservoirs against the critical levels, and keep checking these levels until the pond/reservoir inflows subside. Discuss findings with the Dam Safety Inspector. Check piezometric levels at dam sites if instructed to do so.
Unusually high winds (exceeding 60 kph i.e., 75 % of maximum likely used in design)	Check the condition of erosion protection on the upstream slopes of the dams.
Extreme snow pack (170cm cumulative snowfall) (i.e., 120% or greater than normal snowfall at Barwick)	Check the water levels in all ponds/reservoirs against the critical levels, and keep checking these levels until the spring freshet is over. Evaluate the situation in terms of possible snowmelt scenarios. Make predictions as to the expected storage capacity available in ponds/reservoirs. If deemed necessary, mobilize pumping and mobile treatment equipment to site.
Significant, relatively rapid erosion (any cause) of dam slope of 'sudden' seepage break at dam slope or downstream of dam in form of continuous seepage or boils	Inspect clarity of seepage, rate of seepage and amount of material sloughed. Notify tailings coordinator – site engineering and EOR. Consider initiating Emergency Response Plan
Pond level close to, or approaching a critical level	Notify Manager. Consider initiating Emergency Response Plan

Unusual Event	Post – Event Inspection/Surveillance
Significant change in an instrumentation reading – see table below for definition of significant change	Check the historical readings paying special attention to seasonal changes and check the measurement again. Carry out visual inspection of all areas in the vicinity of the instrument of interest. Contact the Engineer of Record.

5.3 Dam Instrumentation and Monitoring

The instrumentation data is reviewed regularly to identify anomalous readings that could indicate a change in the conditions of the tailings and water management facilities. Dam instrumentation lists are provided in section 4.6. Instrumentation reading and reporting frequencies are outlined in Table 7.2. Responsible parties' record notes and takes pictures of any potential anomalies to provide further information to the EOR. Instrument trigger and alert levels are provided in Table 7.3. Additional details on instrument reading frequencies can be found in the *Geotechnical Monitoring Plan* (Amec Foster Wheeler, 2016b).

Piezometers:

- Vibrating Wire Piezometers shall have a reading frequency every hour and recorded by a data logger, with data collected daily during construction. Post-construction after the readings have stabilized, the reading frequency will be reduced to every 12 hours, as defined in the table below;
- Standpipe piezometers shall be measured weekly during construction and monthly following construction;
- The following are considered anomalous:
    - Sudden increases or decreases that do not correlate with seasonal variations (e.g., groundwater recharge during snowmelt affecting foundation piezometers);

- Trend of piezometric increase that approaches or exceeds the rate of rise of the tailings pond; and
- Pattern of sudden and large increases followed by rapid declines.

Inclinometers:

- Inclinometers shall be monitored semi-weekly during construction and weekly following construction;
- Anomalous data includes:
  - Sudden increases in cumulative displacement/rate of movement of the inclinometers;
  - Zones of concentrated or discrete displacement; and
  - Blockages of the inclinometer casing.

Settlement Plates and Survey Pins/Monuments:

- Settlement Plates and Survey Pins/Monuments shall have a reading frequency of semi-weekly during construction and weekly following construction;
- Anomalous data includes:
  - Sudden displacements of the settlement monuments (x, y, z directions); and
  - Accelerating displacement trends (over two or more readings).

If anomalous readings are observed, the following actions should be taken:

- Check data, reductions and calculations for accuracy and correctness;
- If no errors are found in the calculations, notify the EOR, Geotechnical Engineer and Environmental Manager that an anomalous reading has been observed and that further assessment is going to be conducted;
- Check readout equipment to verify that it is functioning correctly; verify calibration;

- Re-read all instrumentation of the type for which the anomalous reading was observed, in order to check the reading and reading in adjacent instruments;
- If it is observed that an instrument or piece of readout equipment has stopped functioning, notify the Mill Manager and/or Superintendent, and the EOR immediately. If considered critical, a replacement instrument should be installed;
- If the anomalous reading is confirmed, notify the Superintendent and EOR immediately; and
- A detailed review of the effects of the reading should be carried out and the monitoring frequency of the instruments in the area of the anomaly increased to assess the progression of the anomaly. Design or remedial actions should be implemented if determined necessary.

All results are downloaded and provided to the EOR. Any anomalies are noted and a request for an additional reading may occur. The EOR will review the data in quarterly monitoring reports, and make any recommendations, such as increased reading frequencies, pertaining to anomalous readings. The EOR, will also assess the trigger and alert levels and update them as necessary, once per year, as part of the DSI.

Table 5-2; Dam Instrumentation Surveillance Requirements

Type	Frequency
Routine Inspection:	
Dam	Weekly
Diversions	Weekly
Ditches	Weekly
Seepage collection system	Weekly
Spillways	Weekly
Pipelines	Once per 12 h shift
Tailings Pond Monitoring:	Weekly

Type	Frequency
Pump intake	Weekly
Staff gauges	Weekly (initially every ~12h) in Cell 1 borrow
Inflows, Outflows, Condition	Monthly
Dam Instrumentation:	Weekly
TMA, WMP and MRP Comprehensive (and water diversions during initial filling)	• Daily during construction and initial filling • Weekly, during initial operations depending on trend • Monthly during routine operation
Annual Dam Inspection	Annually, with no snow cover
Event Driven Inspection	Following unusual events (defined in table 7.1)
Comprehensive Review (DSR):	
Low and Moderate HPC dams	Every 10 years and prior to decommissioning
Very High HPC dams	Every 5 years and prior to decommissioning

Notes:

1. Dam Hazard Potential Classification (HPC) requires review when changes are made or downstream conditions change.
2. Monthly facility inspections should be carried out by the same staff or small group of staff such that subtle changes in the conditions can be detected.

Table 5-3; Instrument Trigger and Alert Levels

Instrument	Parameter	Trigger Level	Alert Level	Remarks
VWP/STP	Pore Pressure Ratio	$r_u = 0.4$	$r_u = 0.5$	Pore pressure data to be evaluated with corresponding fill elevation, and monitored movements at SPs and INs
Survey Pin	Lateral Movement Rate	Uniform (but less than max 75 mm magnitude)	Accelerating	To be evaluated with IN data to define zones of movement

Slope Inclinometer	Lateral Movement Rate	Uniform	Accelerating	Deformation rates will be associated with rate of construction and post construction movements
	Share Strain Magnitude	2%	5%	If specific plane(s) of shearing is observed within the foundation, the construction shall be limited, progressed with caution or ceased depending on the observed phenomena

Notes:

1. r_u of 0.4 corresponds to a piezometric head at 80% of the dam height. r_u 0.5 is at pietometric head at the crest of the dam.
2. r_u of 0.5 is a design criteria to meet dam stability requirements.

Source; Geotechnical Monitoring Plan (AMECFW, August 2016)

5.4 Dam Safety Inspections (DSIs) and Dam Safety Reviews (DSRs)

Consistent with MECP ECA approvals, with the regulatory exception of the Clark and West Creek Diversions, engineering inspections will be conduct following best management practices as per the Canadian Dam Association's (CDA) Dam Safety Guidelines (2007, revised 2013, as amended from time to time), and the 2014 CDA Technical Bulletin: Application of Dam Safety Guidelines to Mining Dams (as amended from time to time).

5.4.1 Dam Safety Inspections

Annual inspections are intended to be part of a more thorough review of the condition of the facility, and are carried out by the EOR. The inspections will include the following key items:

- Visual inspection of the facility by the engineer, including taking appropriate photographs of the observed conditions;
- Review of routine inspection records prepared by operating personnel in the past year;
- Review whether or not recommendations from previous year's inspection(s) have been addressed, and any incidents or actions arising from those previous recommendations;

- Review of instrumentation and monitoring data;
- Review of tailings deposition and water management operations of the facility including reconciliation of the annual water and mass balance. Review of pond levels (and depth) and freeboard, and reports of any incidents (and remedial measures) that may have occurred;
- An evaluation and interpretation of the structural performance of the dam and related components, and identify any potential safety deficiencies or recommended items that need to be addressed in the coming year;
- Review construction records, QA/QC data and as-built information on dam construction and beaching; and
- Evaluation of the OMS Manual to assess the need for updating.

The results of the inspection and review will be documented in a report.

5.4.2 Dam Safety Review

The Canadian Dam Association (CDA) Dam Safety Guidelines (CDA, 2007) recommend a comprehensive dam safety review be carried out every 5 years during operations, prior to decommissioning and following closure, by a qualified 3rd party consultant.

The comprehensive review provides independent verification of:

- Safety and environmental performance of the facility;
- Adequacy of the surveillance program;
- Adequacy of delivery of OMS Manual requirements;
- Design basis with respect to current standards and possible failure modes; and
- Compliance with new engineering standards (including analysis to confirm if necessary).

5.5 Documentation

Documentation of surveillance and monitoring activities shall be maintained by the Mill Manger, or as designated, as described in the preceding sections and will include recording of:

- Routine visual observations (departures from normal conditions);
- Photographs;
- Instrumentation monitoring and testing;
- Analyses and evaluations; and
- Reviews.

Documentation will include, as a minimum, the following:

- Weekly routine inspection log;
- Monthly tailings facility and process water pond monitoring report;
- Quarterly instrumentation reports;
- Annual Dam Safety Inspection reports; and
- Comprehensive Dam Safety Review report every 5 years.

Documentation will include a hard copy (paper) and electronic filing system for inspection reports, photographic and video records, incident reports, instrumentation readings, instrumentation plots, annual inspections and third-party reviews, so that they can be quickly retrieved for review and in case of an emergency.

5.6 Reporting

The Mill Manager, or designated responsible party, and Geotechnical Engineer will review collected data records from facility monitoring and assess the need for maintenance activities or response. Corrective actions will be identified and tracked to closure. The Environmental Manager is responsible for overseeing sample and data collection and analysis. Reporting will meet MECP requirements and the annual DSI report will also be submitted to the MRNF. Reporting includes;

- As built reports of the dams, excluding the Clark and West Creek diversions, will be submitted to MECP within 90 days of completion;
- An annual report based on the DSI including ECA approval requirements;
- Monthly water quality monitoring report; and
- Annual report including any operating problems and corrective actions, a summary of calibration and maintenance works, use of contingency plans, surface water and groundwater monitoring reports including water balance, ML/ARD updates, discharge volumes and quality.

Additional reporting requirements may be developed as the RRM progresses.

6.0 CLOSURE PLAN

This section summarizes the objectives of the Closure Plan. The *Rainy River Project – Closure Plan* (Amec Foster Wheeler, 2015c) provides the closure plan and includes temporary closure options for short and medium-term shut-down of site facilities.

6.1 Tailings Management Area

Closure of the TMA will include, but is not limited to, the following:

- Flooding of the TMA with a 2 m or deeper water cover;

- A perimeter zone of tailings beach will be maintained to keep the central pond away from the dams, this zone will be covered with a low permeability cover;
- NPAG rock will be placed at the TMA transition zone with the tailings to prevent erosion and suspension and oxidation of solids; and
- Dam structures containing the TMA have been designed with adequate safety factors to provide overall long term safety and stability.

6.2 Embankments

Closure of the embankments will typically involve, but is not limited to reaching of embankments to prevent ponding of water and revegetating slopes to reclaim the area. Some embankment structures will still have a role during the closure phase and these will not be breached. The following structures will continue to be operated during the closure phase:

- MRP will collect runoff and seepage from EMRS, which will be directed to the Open Pit to help flooding;
- Sediment Ponds #1 and #2 will be maintained until site is recognized as a closed mine and monitoring associated with the Metal Mining Effluent Regulation is no longer required

Freshwater diversion and constructed wetland structures are designed to operate passively and will remain in place at closure.

6.3 Monitoring

Monitoring requirements are described in the *Rainy River Project – Closure Plan* (Amec Foster Wheeler, 2017c).

7.0 EMERGENCY PREPAREDNESS

The objectives of this section is to describe procedures to prevent the occurrence of emergencies and reduce the impact, should they arise. This manual covers only those emergency situations that could potentially pose a threat to the structural integrity of the dams or result in the release

of tailings and/or supernatant pond water into the surrounding environment. This document was developed to work in conjunction with the Emergency Preparedness and Response Plan (EPRP) (as reviewed annually and maintained by New Gold H&S team – latest revision February 2017).

The ultimate goal is to protect human life and health, the social well-being of the local community and employees, public infrastructure and company facilities; and environmental conditions and habitats.

7.1 Definition and Classification of Emergencies

An emergency is defined as:

> *"A situation or a set of circumstances which, if not promptly eliminated, controlled or contained, results or could result in a significant injury to people (including the community) and/or damage to the tailings facility, property and/or the environment."*

7.2 Potential Dam Failure Modes

The containment dams at the RRM are predominately zoned embankments with clay cores and rock fill shells. The primary method of dam construction uses the centreline method which is considered to be a stable form of construction. Adherence to design drawings and specifications is critical to minimize the risk of failure.

Several potential failure modes exist for the various tailings storage and water management facilities. These potential failure modes, along with likely triggers, observable visual and instrumentation indicators of the failure mode are presented in Table 9-1. A preliminary dam break inundation map is provided in Figure 9-1.

External hazards originate outside the boundary of the dam and reservoir system and are beyond the control of the dam owner. External hazards include the following:

- Meteorological events, such as floods, intense rainstorms (causing local erosion or landslides), temperature extremes, ice, lightning strikes, and windstorms;
- Seismic events, either natural, cause by economic activity such as mining, or even reservoir induced;

- The reservoir environment, including rim features, such as upstream dams and slopes around the reservoir that pose a threat; and
- Vandalism and security threats.

Internal hazards may arise from the ageing process or from errors and omissions in the design, construction, operation, and maintenance of the dam and water conveyance structures. Internal hazards can be subdivided by source:

- Components that retain or interfere with the body of water;
- Water conveyance structures required to direct water around or through the dam in a controlled way;
- Mechanical, electrical, and control subsystems;
- Infrastructure and plans, including instruments, operating orders, maintenance strategies and procedures, surveillance procedures, and emergency plans, as well as inflow forecasts.

A failure mode describes how a component failure occurs to cause loss of the system function. Failure modes may be interdependent and change in nature and significance at different stages of a dam's life. In any analysis, the failure characteristics, including extent and rate of development, should be determined to an appropriate level of detail. At a general level, there are three dam failure modes:

- Overtopping – water flows over the crest of the dam, contrary to design intent;
- Collapse – internal resistance to the applied forces is inadequate; and
- Contaminated seepage – contaminated fluid escapes to the natural environment.

Dam safety risk management is directed to (1) prevention of the initiation of a failure sequence; (2) control of a deteriorating situation, and (3) mitigation of situations where the failure sequence cannot be stopped.

Table 7-1; Potential Failure Modes, Triggers and Observable Effects

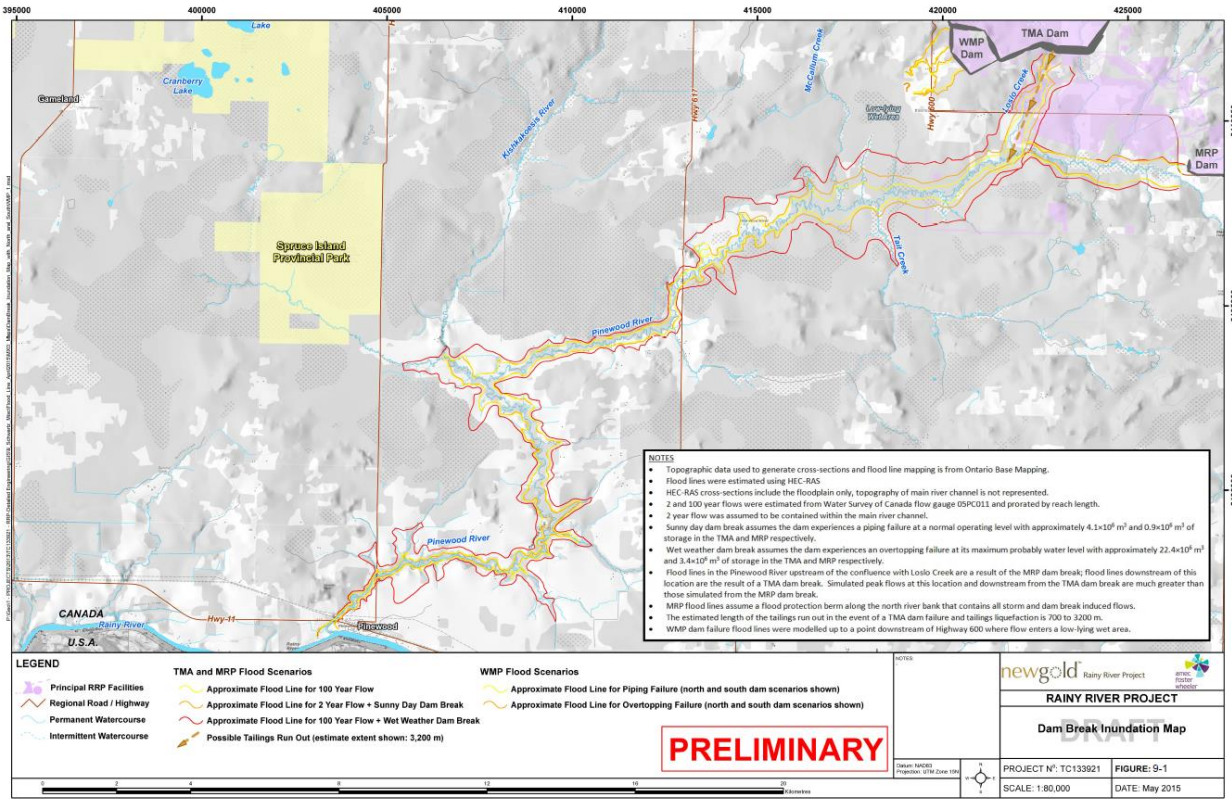
Potential Failure Modes	Possible Causes	Visual Indications	Instrumentation Effects
Break down of pump stations	Blockages, lack of maintenance	No flows	Test on pumps and other related components
Pipeline damage, cracking, blocking, or freezing	Flows blocked by excessively turbid water, debris or ice blockages, extreme weather	No or partial flows; pipeline leaking, cracking or bulging	Pipeline thickness; line pressures; pipeline flow rates
Overtopping	Excessive foundation movements, high wind and wave erosion of beach landslide generated wave, erosion of freeboard, settlement of crest, gully growth towards upstream crest due to seepage, surface runoff or pipe ruptures	Instability in reservoir slopes – slumping, sliding, etc. Damage to upstream face of dam, breach of crest	None
Slope Failure	Changes to porewater pressure within the dam (filters becoming non-functional, earthquake included)	Bulging, slumping, sliding or cracking of dam, increase in volume of seepage	Increase in porewater pressures measured within dam
Foundation Failure	Changes to pore water pressure in the foundation or increases to load applied to foundation (Increase in dam height or pond elevation)	Bulging, slumping, sliding or cracking of dam, or natural ground surrounding the dam	Increase in porewater pressures measured within dam and/or foundation, increase in rate of movement observed in inclinometers and/or survey prisms

Potential Failure Modes	Possible Causes	Visual Indications	Instrumentation Effects
Surface Erosion	Waves, wind or precipitation	Slumping or raveling of upstream or downstream faces of dam	None
Internal Erosion	Erosion of core, creating a pipe/conduit for water flow through dam, growth of a gully behind the crest of dam, turbid seepage water	Rapid increase or unexplained cloudy appearance of seepage through the tailings dams and/or their foundations; appearance of seepage in new locations; formation of sinkholes in dam or on tailings beach	Rapid change if the in porewater pressures measured within dam and/or foundation
Cracking	Differential settlement of dam, earthquake induced	Cracks on dam crest or faces; bulging or slumping of dam	Increase to rate of movement observed in inclinometers or survey monuments or prisms

Other failure modes might also include the following:

- Slumping, sliding, cracking or bulging of the tailings dam
- Rapid increase or unexplained cloudy appearance of seepage through the tailings dam and/or its foundation
- Formation of sinkholes on the tailings beach or dam
- Breakage of tailings pipelines, which may result in dam erosion and/or release of tailings slurry
- Earthquakes
- Major storm events or flood
- Sabotage and other criminal activities

Figure 7-1; Preliminary Draft Inundation Map



7.3 Warning Signs and Threshold Criteria

The warning signs for an emergency are defined below:

- Level I: Conditions that do not yet represent a potential emergency but that do require investigation and resolution on a prompt basis, along with intensified surveillance.
- Level II: Conditions that represent a potential emergency if allowed to continue to progress, but no such emergency is imminent.
- Level III: An obvious emergency has occurred or is imminent.

Table 9-2 discusses potential warning signs, consequences and actions to be taken.

Table 7-2; Warning Signs, Level of Emergency and Responses

Level	Warning Sign/Situation	Actual or Potential Consequences	Action(s) to be Taken
1	Unusually high, one-time reading from a single piezometer.	Possible early warning sign of worsening piezometric/seepage conditions.	• Check piezometer reading, and check for infilling of piezometer. • If reading confirmed, check all other piezometers, and examine downstream area of dam for changed seepage conditions. • Intensify piezometer readings.
	Decreased seepage discharge accompanied by gradually increasing piezometer levels.	Possible sign of clogging of internal drainage system of dam.	• Check chemistry of seepage discharge for any changes relative to normal. • Request tailings dam engineer to re-evaluate slope stability at this location.

Level	Warning Sign/Situation	Actual or Potential Consequences	Action(s) to be Taken
	Increase in size of erosion gullies.	Possible erosion resulting from seepage and/overland runoff. May lead to accelerated erosion and result in dam failure.	• Backfill gullies with filter material and fine rockfill.
2	Increase in seepage discharge, accompanied by discharge of tailings within seepage (dirty water).	Possible indication of a developing internal erosion (piping), that could eventually lead to dam breach/pond release, or excessively high levels of saturation that could result in slope instability.	• Initiate chain of communication (Figure 9-2) and monitor the situation. • Discontinue tailings discharge in the seepage area. • Intensify monitoring of seepage at this location. • Note if the seepage discharge and/or turbidity continue to increase. • Read piezometers. • Be prepared to place filter material in area of discharge from emergency stockpiles.
	Seepage on dam abutments, causing localized erosion and slumping of dam slope.	Could lead to progressive slope failure on abutment, resulting in dam failure and breach of pond.	• Discontinue tailings discharge in the seepage area. • Place filter material over seepage area using emergency stockpiles. • Continue to monitor area on an intensified basis. • Initiate chain of communications if situation does not improve.

Level	Warning Sign/Situation	Actual or Potential Consequences	Action(s) to be Taken
	Extended period of unusually heavy rainfall, or unusually large snowmelt.	Could lead to raised levels of saturation within the dam slope, which could in turn lead to slope instability.	• Increase frequency of piezometer readings to weekly. • Intensify inspections of downstream dam slope, looking for signs of localized instability/concentrated gully erosion, and for soft ground (saturated slope) conditions.
	Relatively high, unexplained, and ongoing increase in piezometer levels within the dam and/or foundation – threshold limits being approached.	Probable sign of progressive deterioration of toe drainage provided by starter dams. Could, if left unattended eventually lead to failure of the dam.	• Assess rate of rise and determine if it is steady or accelerating. • If piezometer level increase was sudden, check the reading (repeat it) to eliminate the possibility of a reading error. • Sound bottoms of piezometers to check for infilling. • Send piezometer readings to the tailings dam engineer. • Inspect downstream area for increased seepage and/or turbidity of seepage discharge.
	Long term or sudden increase in rate of inclinometer movements.	Possible sign of impending slope instability.	• Check reading, and contact the Geotechnical Engineer and EOR if confirmed. • Inspect area for any visible signs of instability, bulging on outer slope or at toe, or tension cracks on dam crest. • If tailings discharge is occurring near the inclinometer that indicates unexplained movement, relocate discharge point further away. • Increase frequency of inclinometer readings. • Read nearby piezometers.

Level	Warning Sign/Situation	Actual or Potential Consequences	Action(s) to be Taken
	Ongoing cracking and evidence of dam and/or foundation movement.	Possible sign of impending failure of dam, especially if the rate of movement/cracking is accelerating.	• Check inclinometer readings. • If rate of deformation is accelerating, initiate chain of communication. • Read piezometers. • Check for water inflow into tension cracks. • Regrade to channel runoff away from tension cracks, as water inflow can result in accelerated movement.
	Highly turbidity discharge from decant outlet.	Possible sign of collapse of a portion of the decant, allowing tailings into outlet. Can, if left unattended, lead to internal erosion failure and eventual dam breach.	• Check decant inlet to see if water turbidity matches that in discharge. • If water at inlet is clear, then close off decant inlet to prevent further discharge. • Notify tailings dam engineer and develop alternate decant arrangements. • Inform Mill.
	Rupture of tailings and/or water pipelines on crest of dam, resulting in erosion of downstream dam slope	Could lead to erosive failure of dam, and pond breach, if allowed to continue.	• Contact Mill and have discharge of tailings stopped. • Repair the rupture. • Inspect and repair the washed-out portion of the dam slope. • Do not discharge tailings into the area of the washout. • Notify tailings dam engineer to design slope re-construction.

Level	Warning Sign/Situation	Actual or Potential Consequences	Action(s) to be Taken
	Seepage daylighting from tailings slope at a significantly higher elevation than had previously been observed at that particular location.	Could lead to erosion, and progressive slope failure, resulting in dam failure and breach of pond.	• Read piezometers. • Assess rate of seepage and whether or not internal erosion is occurring. • If piezometers confirm high phreatic levels, initiate chain of communication. • Carry out weekly monitoring of the seepage discharge area of concern. • Avoid discharge of tailings into the impoundment adjacent to the area.
	Severe flood/intense rainstorm or rapid snowmelt.	Overtopping and washout of dam, and release of pond. Concentrated erosion of tailings slopes, resulting in localized gullying, over-steepening, and potential slope failure. Raising of phreatic surface as a result of infiltration possible.	• Initiate chain of communications (Figure 9-2). • Check the minimum width of tailings beaches. • Inspect spillway for flow and condition. • Stop tailings discharge and slowly lower tailings pond by removing stop logs. • Carry out detailed inspection of dam and pond. • Inspect dam slopes for areas of concentrated erosion, and repair. • Read all piezometers. • Mobilize emergency pumps if needed.
3	Failure or suspected imminent failure of a dam.	Catastrophic breach and release of pond.	• Initiate chain of communications (Figure 9-3). • Stop tailings discharge and lower tailings pond by removing stop logs.

Level	Warning Sign/Situation	Actual or Potential Consequences	Action(s) to be Taken
	Slumping, sliding, or bulging of a dam slope or adjacent ground.	Catastrophic breach and release of pond.	• Initiate chain of communications (Figure 9-3). • Lower pond by removing stop logs. • Do not attempt construction (e.g., construction of a stabilizing berm) until the EOR is on the site (earthmoving equipment should be mobilized).
	Water vortex (whirlpool) within the tailings pond.	Indicates an internal erosion failure in progress, with potential breach of the tailings dam.	• Initiate chain of communications (Figure 9-3). • Stop tailings discharge and lower tailings pond by removing stop logs. • Check downstream area of dam for areas of increased and/or turbid seepage discharge. • Place granular filter buttress against any such areas, using emergency stockpiles. • Go directly to decant outlets if vortex is on a decant line; plug decant outlet with granular material if tailings are discharging through decant.
	Sinkhole observed on tailings beach or on a downstream dam slope.	Indicative of internal erosion, which could progress to the point where dam breach results.	• Initiate chain of communications (Figure 9-3). • Stop tailings discharge and lower tailings pond by removing stop logs. • Immediately check dam toe areas/decant outlets for heavy seepage that is transporting tailings solids. • Place granular filter buttress against any such areas, using emergency stockpiles.

Level	Warning Sign/Situation	Actual or Potential Consequences	Action(s) to be Taken
	Large earthquake.	Dam failure, breach and release of pond.	• Initiate chain of communications (Figure 9-3). • Carry out detailed post-earthquake inspection of the dam. • Read all instrumentation (piezometers and inclinometers).
	Rapid, unexplained, orders of magnitude increase in seepage rate and turbidity (dirty water indicating transport of tailings) at a dam slope seepage location and/or foundation.	Internal erosion (piping) failure leading to dam breach and release of pond. Elevation of pore pressure conditions that could initiate a slope failure.	• Initiate chain of communications (Figure 9-2). • Place stockpiled filter materials over seepage discharge area to prevent further erosion of material. • Read piezometers in area of seepage discharge.

7.4 Incident Notifications Procedures

Roles and responsibilities:

- Any individual who observes an incident shall initiate the appropriate notification procedure.
- All members listed on the notification procedures shall be familiar with established protocol and familiar with the OMS Manual (as per training Section 2.5).

- If a member of the team on the notification procedures is not contactable then the Incident Commander shall be notified and proceed with the notification procedure.

Notification procedures have been developed for Level I, II and III emergencies provided below to ensure quick onsite responses in the event of an identified emergency. The Mill Manager will be in charge of initiating the site wide EPRP (NG, 2017) in the event of a Level III emergency.

The notification procedures for a Level I and Level II emergency are illustrated on Figure 9-2. The notification procedure and initiation of the EPRP in the event of a Level III emergency is shown on Figure 9-3. Rapid response to Level III emergencies is critical to ensuring that staff, contractors and site visitors safely reach a muster station and that timely notification is made to appropriate local and provincial authorities as well as external stakeholders.

Figure 7-2; Levels I and II Emergency Notification Procedure Flowchart

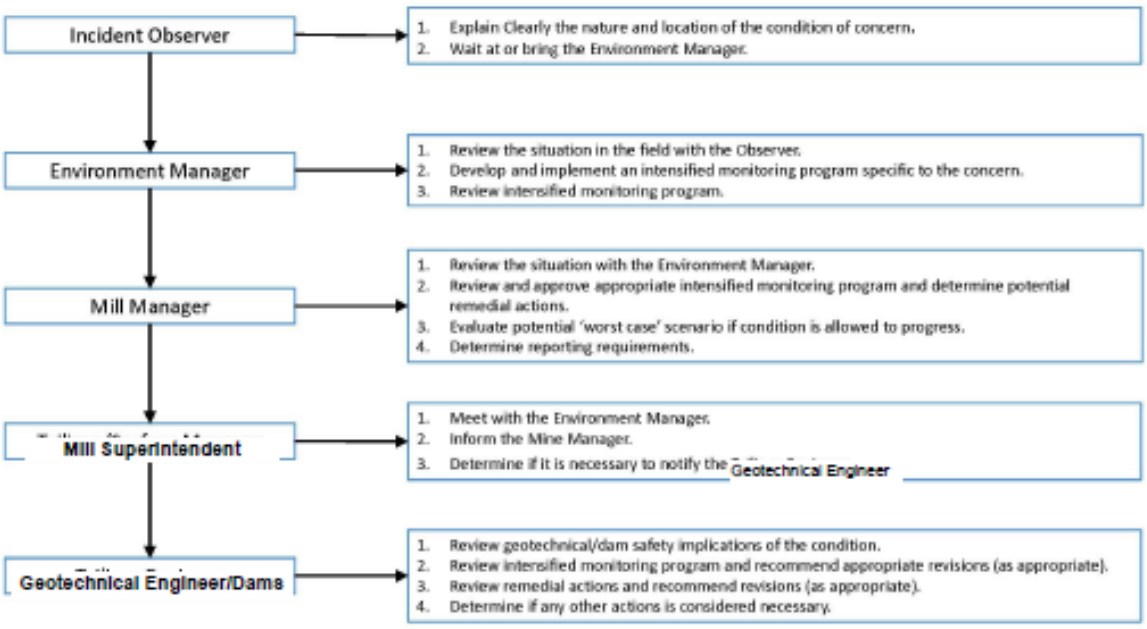
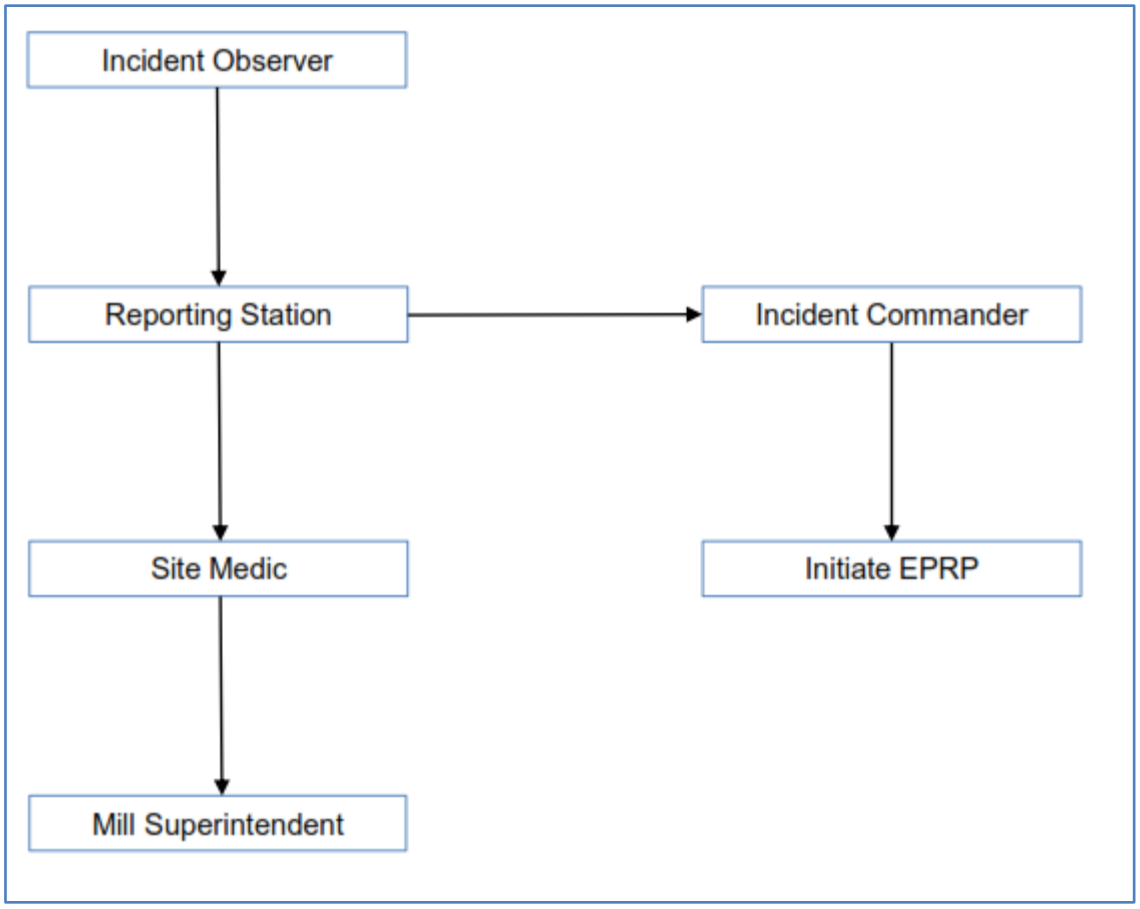

Incident Observer
1. Explain Clearly the nature and location of the condition of concern.
2. Wait at or bring the Environment Manager.
Environment Manager
1. Review the situation in the field with the Observer.
2. Develop and implement an intensified monitoring program specific to the concern.
3. Review intensified monitoring program.
Mill Manager
1. Review the situation with the Environment Manager.
2. Review and approve appropriate intensified monitoring program and determine potential remedial actions.
3. Evaluate potential 'worst case' scenario if condition is allowed to progress.
4. Determine reporting requirements.
Mill Superintendent
1. Meet with the Environment Manager.
2. Inform the Mine Manager.
3. Determine if it is necessary to notify the Geotechnical Engineer
Geotechnical Engineer/Dams
1. Review geotechnical/dam safety implications of the condition.
2. Review intensified monitoring program and recommend appropriate revisions (as appropriate).
3. Review remedial actions and recommend revisions (as appropriate).
4. Determine if any other actions is considered necessary.

Figure 7-3; Level III Emergency Notification Procedure Flowchart


Incident Observer
Reporting Station
Incident Commander
Site Medic
Initiate EPRP
Mill Superintendent

7.5 Emergency Contacts

Internal emergency contact information is provided RRM EPRP. An emergency response can be initiated through;

- RRM radio channel 4 – state ‘Emergency, Emergency, Emergency’ and describe the type and location of the emergency
- RRM internal phone system – dial 8888
- RRM security direct line – 1-807-708-0646
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7.6 Emergency Preparedness Procedures

All employees, including contractors working at the RRM must be familiar with the procedures outlined in the EPRP for the site and TMA to the extent required to perform their functional role. All supervisors and contact persons for contractors must ensure their employees understand those procedures relevant to their work area and ensure that their employees are familiar with, and recognize the proper course of action in the event of an emergency. The supervisor must also ensure that all employees are made aware of any revisions to the EPRP for the site and TMA.

The EPRP is the site and TMA’s guidance document relating to emergency responses and protocols to be followed during upset conditions, unusual events or incidents. A preliminary dam break inundation map is provided in figure 9-3.

Emergency preparedness measures with regard to dam safety include: maintenance of access to dam locations; availability of fill materials and equipment required in the event that remedial works are required; and the ability to access and traffic control measures to ensure safety of workers and public.

8.0 CONTINGENCIES

The operations are sensitive to water balance and water quality in discharges. The following are contingencies based on water management and functioning of the diversions.

8.1 Sediment Ponds

8.1.1 Sediment Pond #1

Water from Sediment Pond #1 can't be discharged to the environment. Sediment Pond #1 will be continuously pumped to the TMA and water level will be kept at 1.5 m from the bottom. The following contingency plan of Sediment Pond #1 will be required if one of the following criteria are met:

1. Sediment Pond #1 water level has exceeded the MOWL of 353.7 masl.
2. Dam performance conditions deemed unsafe by the Engineer of Record
3. In the event the water quality nears discharge exceedance values, water will be pumped at greater volume to prevent unauthorized discharge.

Should criteria 1 or 2 be triggered:

- Notify the authorities
- If insufficient, pump water to the TMA
- If insufficient, pump water to the MRP
- If insufficient, pump to the Pit

Should criteria 3 be triggered:

- Notify the authorities
- Add pumping capacity to the TMA
- If insufficient, pump water to the MRP
- If insufficient, pump to the Pit

If the dewatering is required, the MOECC and MNRF will be informed immediately of the planned emergency procedures. Dam safety is of primary importance and the EOR should be contacted immediately.

8.1.2 Sediment Pond #2

Water from Sediment Pond #2 can't be discharged to the environment. Sediment Pond #2 will be continuously pumped to the TMA and water level will be kept at 1.5 m from the bottom. The following contingency plan of Sediment Pond #1 will be required if one of the following criteria are met:

1. Sediment Pond #2 water level has exceeded the MOWL of 348.2 masl.
2. Dam performance conditions deemed unsafe by the Engineer of Record
3. In the event the water quality nears discharge exceedance values, water will be pumped at greater volume to prevent unauthorized discharge.

Should criteria 1 or 2 be triggered:

- Notify the authorities
- Add pumping capacity to the TMA
- If insufficient, pump water to the MRP
- If insufficient, pump to the Pit

Should criteria 3 be triggered:

- Notify the authorities
- Add pumping capacity to the TMA
- If insufficient, pump water to the MRP
- If insufficient, pump to the Pit

If the dewatering is required, the MECP and MNRF will be informed immediately of the planned emergency procedures. Dam safety is of primary importance and the EOR should be contacted immediately.

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