RAINY RIVER PROJECT

PART VI - DIVERSIONS - OPERATION, MAINTENANCE AND SURVEILLANCE MANUAL WATER MANAGEMENT STRUCTURES

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1.0 Regulatory Requirements

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-2015-03B/A: Clark Creek Dam, Clark Creek Pond, Clark Creek Diversion Channel, Teeple Dam, Teeple Pond, and Teeple Pond Diversion Channel.

- LRIA-FF-2015-02B/A: Stockpile Pond Dam, Stockpile Diversion Channel, West Creek Pond Dam, and West Creel Diversion Channel

- LRIA-FF-2017-01:

2.0 FACILITY DESCRIPTIONS

Freshwater diversion is provided by the following;

- Clark Creek diversion including the Clark Creek and Teeple dam and diversions; and
- West Creek diversion including the Stockpile and West Creek dam and diversions.

The freshwater diversions function to reduce inflows to the RRM and provide offsetting habitat for the loss of portions of Loslo, Marr, Clark and West creeks. Diversion of the non-contact runoff from these catchments reduces the effluent management requirements. All structures support fish habitat.

2.1 Freshwater Diversion Dams and Channels

The freshwater ponds are designed to minimize the net freshwater inflows into the project by diverting non-contact runoff around the site via dams, ponds and diversion channels. The West Creek Pond, Clark Creek, Stockpile Pond and Teeple Road dams were developed in a single dam raise during the construction phase to support the requirements of the *Water Management Plan for Operations* (Amec Foster Wheeler, 2015a). Additional details regarding these dams, ponds, and diversion channels are provided in section 4.1.

The freshwater diversion structures have been developed in accordance with the following design briefs. As-built reports have been issued. A detailed list of Drawings is provided in Appendix A.

Table 2-1; Supporting Documents for the West Creek and Clark Creek Diversions

Document Title	Reference
Design Brief – Water Management Dams	(Amec Foster Wheeler, 2015b)

Design Update – Clark Creek Pond Dam	(Amec Foster Wheeler, 2016i)
Stockpile Pond Dam – Design Revision and Operating Guidelines	(Amec Foster Wheeler, 2016j)
West Creek Dam – Design Revision and Operating Guidelines	(Amec Foster Wheeler, 2016k)
Clark Creek Diversion – As-built Report	(Amec Foster Wheeler, 2017a)
West Creek Diversion – As-built Report in preparation	(Amec Foster Wheeler, 2017b)
Drawing Title	**New Gold Document Number**
West Creek Pond Dam – Layout and Foundation – Preparation Plan & Details	3098004-002510-A1-D50-0001
West Creek Diversion Channel – Plan and Profile	3098004-002510-A1-D70-0003
Stockpile Pond Dam – Plan, Typical Section and Profile	3098004-002580-A1-D70-0002
Stockpile Pond Diversion Channel – Plan and Profile	3098004-002580-A1-D70-0004
Clark Creek Pond Dam – Plan, Typical Section and Profile	3098004-004400-A1-D70-0001
Clark Creek Pond Diversion Channel – Plan and Profile	3098004-004400-A1-D70-0002
Teeple Road Dam – Plan, Typical Section and Profile	3098004-004400-A1-D70-0003
Teeple Road Pond Diversion Channel – Plan and Profile	3098004-004400-A1-D70-0004

Table 2-2; Summary of the Diversion Characteristics

Dam and Pond				Channel											
Dam		Pond		Channel Design Criteria											Additional features
Name	Crest Elev.	Area	Vol.	Diversion Channel Inlet/Outlet	Design Peak Flow Event	Segment	Function	Design Flow	Freeboard	Flow Depth	Base Width	Length	Gradient	Side Slopes	
	(m)	(ha.)	(Mm^3)		(-)	(Sta.)		(m^3/s)	(m)	(m)	(m)	(m)	(%)	(H : V)	
Clark Creek Diversion															
Clark Creek	380.0	9.2		Clark Creek Pond to Teeple Road Pond	100-yr 24-hr	0+000 - 1+229	Channel				6	1229	0.10	4 : 1	
Teeple Road	379.0	2.9		Teeple Road Pond to Pinewood River	100-yr 24-hr	0+020 - 0+580	Channel				6	560	1.25	4 : 1	
West Creek Diversion															
Stockpile Pond	375.5	4.6		Stockpile Pond to West Creek Pond	PMF	0+150 - 0+200	Spillway				33	50	0.96	4 : 1	- Tributary 2 confluence (Sta. 0+775)
						0+200 - 0+250	Channel				33 to 6	50			
						0+250 - 1+346					6	1096			
West Creek	364.9	13.2		West Creek Pond to Loslo Creek	PMF	0+000 - 0+584.5	Spillway				8	584.5	0.00 to 1.00	4 : 1	- High level side weir at flow control structure - Culverts?
					100-yr 24-hr	0+584.5 - 0+647	Flow control structure				8 to 3	62.5	1.00		
						0+647 - 2+150	Channel				3	1503	1.00 to 0.10		
						2+150 - 2+750					5	600	0.10		
						2+750 - 4+576					3	1826	0.10 to 0.57		

Notes
1) Low flow and fish habitat features are included in all diversion channels below the hydraulic flow section

2.1.1 West Creek Diversion

The West Creek Diversion system diverts flows from the West Creek and its tributaries around the Open Pit and discharges into the Pinewood River at Loslo Creek. It includes the Stockpile

Pond Dam and Diversion Channel, which divert flows around the Plant Site, and the West Creek Pond and Diversion Channel, which divert flows around the Open Pit. The dams have a 'very high' hazard potential classification equivalent to extreme hazard classification by the CDA. The following sections describe the components of this diversion.

2.1.1.1 Stockpile Pond and Diversion Channel

The objective of the Stockpile Pond is to divert freshwater from natural ground into the West Creek Watershed. The Stockpile Pond Diversion Channel was designed to convey the Probable Maximum Flood (PMF) from the plant site area to the West Creek Pond. The Stockpile Pond Diversion will also provide fish habitat compensation. The Stockpile Pond Diversion Channel base width varies from 6 to 33 m with 4H:1V side slopes. The total length of the diversion channel is about 1,200 m.

The dam height is 7.5 m with 4:1 slopes with a crest width of 6 m and length of 175 m. The dam crest elevation is 375.5 m and the diversion channel invert is 372.2 m. NOWL provides capacity for 93,700 m^3 of storage with greater volumes discharges through the 33 m spillway into the diversion channel. The diversion channel is a low (<1%) gradient channel reporting to the West Creek Pond with a typical bottom width of 6 m.

The design brief for the dam is RRP-GEO-REP-003. Construction was completed on the diversion in November 2016 and confirmed by the EOR (RRP-GEO-MEM-080-R1). Construction of the dam was completed in May 2017 and confirmed by the EOR (RRP-GEO-MEM-119-R1). The dam was constructed with a central clay core and random fill and or NPAG rock shells.

2.1.1.2 West Creek Pond and Diversion Channel

The West Creek Pond is located upstream of the Open Pit and west of the Process Plant at a point that allows for the raising of the pond water level sufficiently to divert flows westerly through a diversion channel and around the Open Pit. The West Creek Dam intercepts all West Creek flows from the north, as well as drainage from two tributaries to the east, diverted through the Stockpile Diversion Channel.

The West Creek Dam is a central clay core with random fill upstream shell and NPAG mine rock downstream shell. It has a crest elevation of 364.9 m (~156,000 m^3), maximum height of 7.4 m, and overall side slopes of 7.9H:1V including rock toe berms. The West Creek Pond has been designed to contain the PMF while discharging to the West Creek Diversion Channel.

The first 615 m of the West Creek Diversion Channel acts as the Emergency Spillway of the West Creek Dam and has been designed to convey a PMF event. The spillway invert elevation is 361.0 m and is 8 m wide. This provides a freeboard of 4.0 m at normal water level in the pond. During a PMF event the peak water level would rise to 364.5 m, leaving 0.4 m of freeboard.

2.1.1.3 West Creek Diversion Overflow Structure

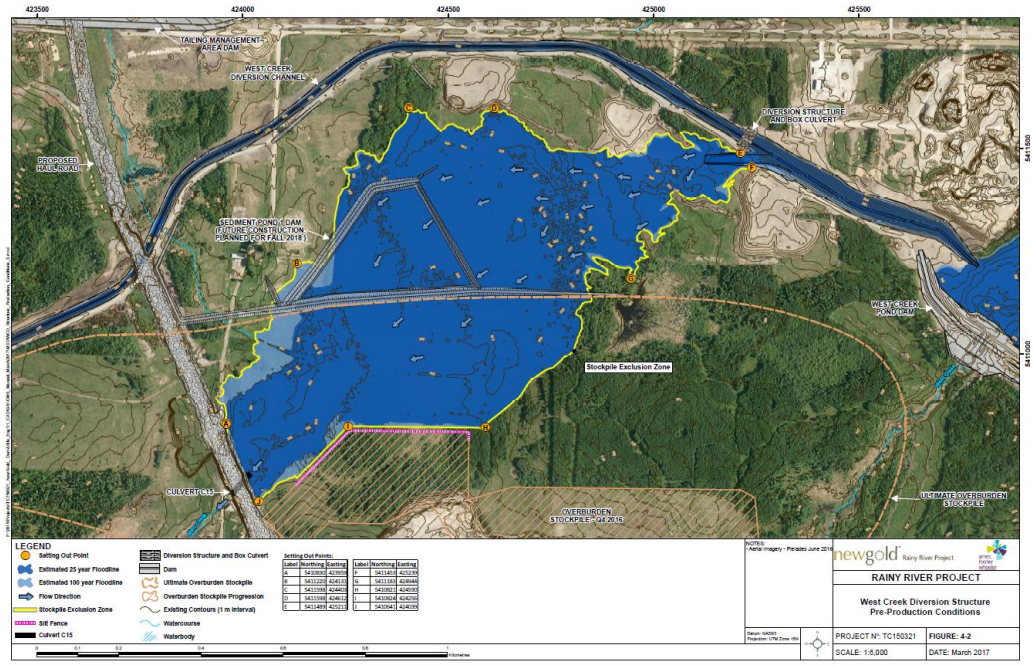
The Overflow Structure (or weir) is located at Sta. 0+615 within the Diversion Channel. A box culvert (62.5 m long by 2.4 m wide/tall) constricts the channel flow such that a side overflow weir may be activated (invert elevation 360 m, width 50 m). The purpose of the overflow structure is to restrict the flow rate discharging from the culvert under high flow conditions. The remaining ~4,000 m of diversion channel is over flat ground with minimal elevation change. The reduced flows through this section of diversion channel allow a much smaller channel excavation.

The overflow structure has been designed such that during a PMF event, the flow rate downstream of the culvert, i.e., in the channel, does not exceed the 100-year flood outflow from

the West Creek Pond (26.9 m^3/s). The diversion channel upstream of the diversion structure will back up, with excess flows diverted through the side overflow channel. Containment is provided above the culvert by a berm across the diversion channel with a crest elevation of 363 m. The peak water level in the diversion channel during a PMF event will be 362.5 m, providing 0.5 m of freeboard to the crest of the berm.

The overflow structure will be activated for events greater than the 10-year storm. The peak overflow channel discharge during a PMF event will be 163.8 m^3/s. The overflow channel discharges onto a flat, grassy plain south of the West Creek Diversion Channel and north of the ultimate WMRS. This area, termed the exclusion zone, is shown on Figure 4-2 and is required to remain undeveloped to prevent the loss of natural vegetation until Sediment Pond 1 berm is constructed, north of the WMRS. In the field, this area is demarcated by bright coloured stakes and ribbons. The ground topography will naturally drain any overland flow through Culvert C15 into Marr Creek.

Figure 2-1; West Creek Diversion Overflow Exclusion Zone



2.1.2 Clark Creek Diversion

The purpose of the Clark Creek diversion is to divert natural drainage and runoff around the East Mine Rock Stockpile and provide fish habitat offsetting. The Clark Creek Diversion Channel diverts runoff from the Clark Creek upstream of the Clark Creek Dam and the EMRS, through the Clark Creek diversion channel into Teeple Pond and subsequently into Teeple Diversion and to the Pinewood River via a culvert under Teeple Road.

Construction of the Clark Creek Diversion occurred between August 29, 2015 and December 4, 2016 and authorised by LRIA FF-2015-03A and the Fisheries Act approval. There are applicable federal and provincial EA commitments, however as a freshwater diversion there a limited MECP requirements beyond sediment control.

Clark Creek and Teeple Road Dams were constructed as homogenous clay fill embankments utilizing native clay overburden. The clay fill is protected by gravel and cobble sized materials, with a layer of geotextile separation, to prevent erosion. Overflow sections for Teeple Dam are included on the dams to carry storm flows (i.e., activated by 2-year event) and have been designed to handle events in excess of the 100-year return design flow. Overflow sections are provided to permit the safe passage of water in the event the pond level exceeds the maximum operating water level. There are no active controls on the water flows. Clark Creek Dam features a 20 m wide overflow section and Teeple Road Dam features a 150 m wide overflow section designed to allow water and fish to flow over the structure.

The diversions are designed to convey the 1:100 year flow and are typically 6 m wide (base width) with 4:1 slopes. The Clark Creek diversion is 1,200 m and the Teeple Diversion is 580 m long.

Table 2-3; Design Parameters for the Clark Creek Diversion

Design Parameter	Unit	Clark Creek	Teeple
Embankment dam crest elevation	m	380.0	379.0
Dam overflow section invert elevation	m	379.9	378.7
Normal Water Level (NWL) elevation	m	378.75	378.5
Diversion channel inlet invert elv.	m	378.75	378.5
Diversion channel outlet elv.	m	377.6	371.5
Diversion channel gradient (average)	%	0.1	1.2
Diversion channel side slopes		4:1	4:1

Deviations from design occurred for both diversions, however not anticipated to have a negative effect of stability. Examples of deviation include absence of low flow channel, oversized boulders, variances on habitat feature frequency and riffles either not meeting design elevation or being too steep

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 2-4; 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 Freshwater Diversions

The freshwater diversion structures (dams and diversion channels) are designed to be operated passively. Clark and Teeple Ponds are full and the diversions are flowing naturally. Stockpile pond is currently filling and will flow through the stockpile diversion once the water level is above the invert to the diversion. West Creek is being allowed to slowly fill, however a terminal plug remains in place and pumps are being used to dewater the diversion.

In summer/fall 2017, the plug will be removed and the plug area will stabilise prior to water flowing through location of the former plug.

Culverts at Georgeson Lane and Marr Creek are below the design specification of the West Creek Diversion below the hydraulic control. Pending Schedule 2 approval (anticipated January 2018) these two culverts will be removed prior to freshet 2018 and the channel stabilised consistent with the design outlined in section 4.

3.2 Progressive Reclamation and Closure

Some progressive reclamation with respect to the TMA is proposed as part of mine operations. By the end of the operations phase a low permeability overburden cover of approximately 150 m in width will be placed on the upstream side of the TMA dam. The overburden cover will cover approximately two thirds of the ultimate perimeter, with the remaining approximately one third of the length to be reclaimed at closure. This cover is intended to prevent the tailings permanent water cover from coming into contact with the TMA dams, and will also serve a secondary function of limiting oxygen diffusion into the uppermost portion of the tailings underneath. The overburden cover will be seeded or hydroseeded with a native seed mix or equivalent, and will be armoured with NPAG rock at the transition zone of the cover with the tailings to prevent suspension and oxidation of solids.

Closure of the RRM in respect to tailings, process water and freshwater management will include but is not limited to the following:

- Clark Creek Pond, West Creek Pond, Teeple Pond, Stockpile Pond, West Creek Diversion Channel, Clark Creek Diversion Channel, Teeple Pond Diversion Channel and Stockpile Pond Diversion Channel support the creation of fish habitat for compensation purposes as such they will remain in place at closure; and

3.3 Safety and Security

The site safety and security will be following the RRM Health and Safety Management System including but not limited to the following:

- The site will be gated with restricted access to authorized personnel only;
- The TMA will be fenced along portions of the old highway 600 and access will be restricted to authorized personnel only;
- No public access;

- Construction Management provided security measures; and
- Onsite health and safety policies for working around bodies of water, working alone or crossing ice.

3.4 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

3.5 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

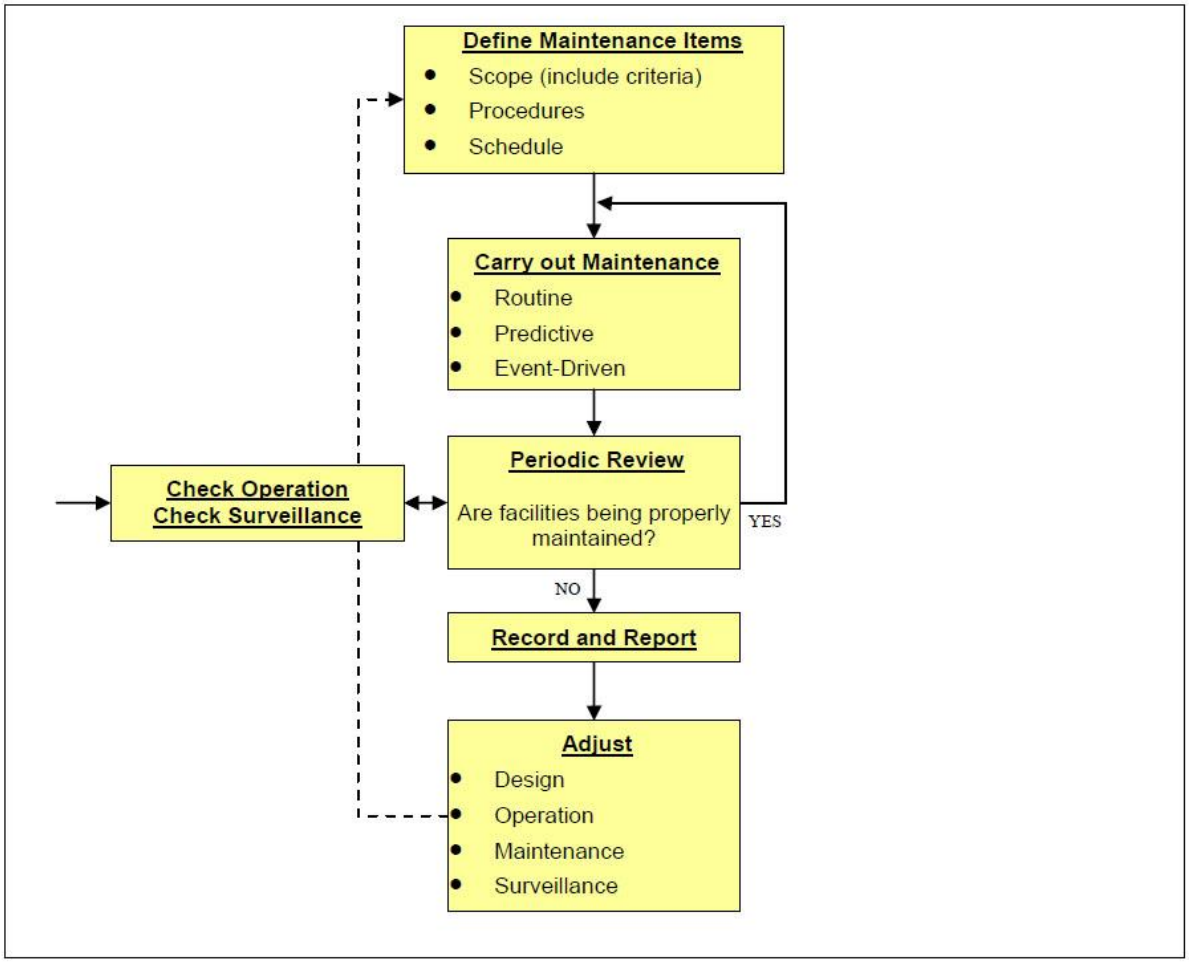
The following periodic maintenance is required:

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 Diversions

There are approximately 10 km of diversions associated with the Clark and West Creek diversion. Maintenance activities required include;

- Repair erosion and bank stability particularly in areas of concentrated flow e.g., culverts;
- Remove debris, and where required and approved beaver dams, that aren't part of natural progression of channel development
- Repair/modify fish habitat features if monitoring determines they are not meeting the success criteria per Fisheries Act Authorization 15-HCAA-00039, including dam crest/slope

Specifically, for the Clark Creek diversion, as per the as built report, the following maintenance will be conducted;

- Repair riffles in the Teeple Road Diversion, directly downstream of the inlet in fall 2017.

4.2.4 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.

4.2.5 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.

4.2.6 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.

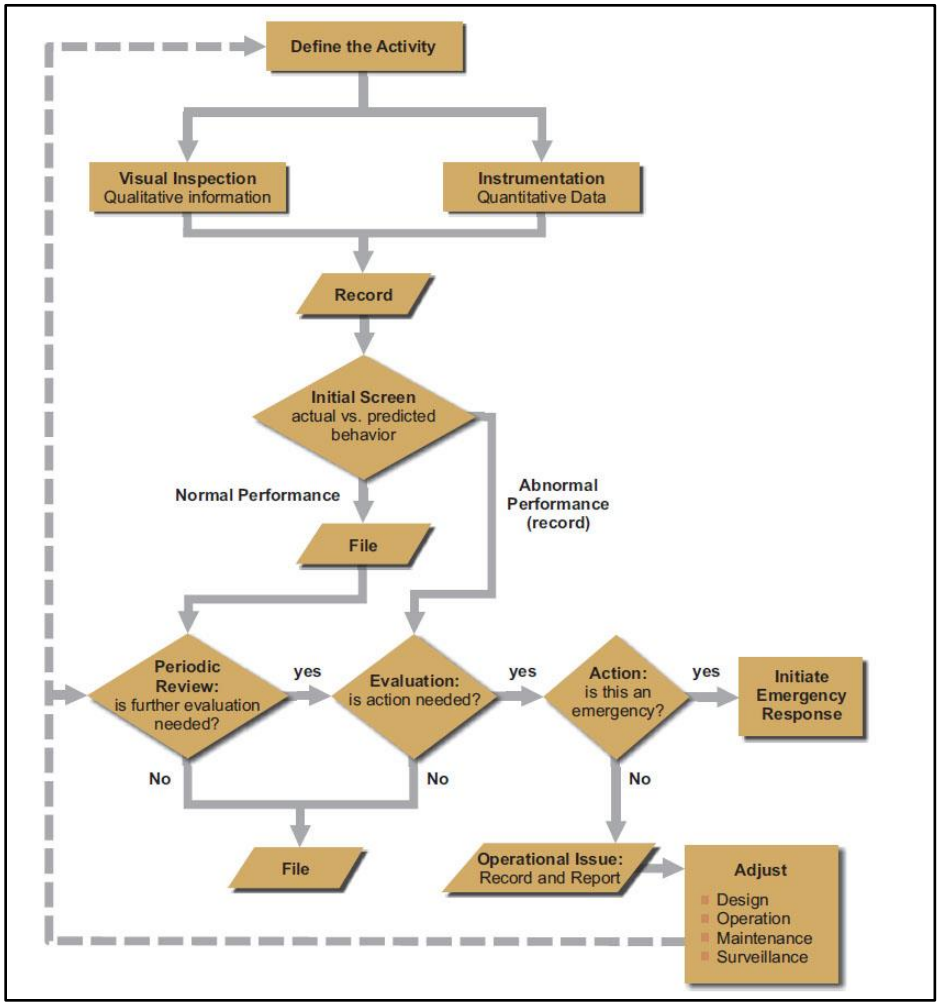
5.0 DAM SAFETY AND SURVEILLANCE

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



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

5.1.3.1 Diversions

The Clark and West Creek diversions, while designed to operate passively, have specific surveillance requirements as part of the approved Fisheries Act authorizations. Further, impediments to water flow in diversions have the potential to alter water levels in the ponds. For the diversions, in addition to requirements specified above, and following the as built report for the Clark Creek Diversion these surveillance requirements will be conducted;

- Inspection of fish habitat features, as per Fisheries Act Authorization 15-HCAA-00039;
- Complete a survey of the Clark and Teeple dam crests and diversion channel inverts annually, observations of crest irregularity will require correction to avoid concentrated runoff in the overflow spillway;

- Monitoring pond levels include Teeple and Stockpile ponds (by staff gauge, transducer or other suitable means) daily. The frequency will be re-evaluated after one year of operation (May 2018).

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 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

Unusual Event	Post – Event Inspection/Surveillance
	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
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
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
	Lateral Movement Rate	Uniform	Accelerating	Deformation rates will be associated with rate of construction and post construction movements

Slope Inclinometer	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 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.

6.2 Monitoring

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

7.0 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.

7.1 Freshwater Diversions

There are specific contingencies required, based on the Fisheries Act authorization (application Table 6) for the freshwater diversion that relate to the OMS i.e., not biological. These are provided in the following table.

Table 7-1; Contingencies for Freshwater Diversions

Attribute	Mode of Failure	Contingency
Physical construction of offset measures	• Dam not constructed as per plans • Channel not constructed as per plan.	• Engineer to assess failure and recommend corrective actions.

	• Water area, depths and or habitat structures not in place or present as per the plans.	• Proponent to take required corrective action.
Physical function of offset measures	• Conditions do not provide for fish passage	• Engineer / biologist to assess cause of failure and recommend corrective actions. • Take required corrective action
	• Water level not consistent with those specified in plans.	• Adjust grades of structures to alter • water levels • Excavate pools to specified depths.
Stability of structures	• Constructed habitat features (log and boulder structures) missing or not functional	• Repair or replace structures
	• Shorelines and graded offset features not stable (less than 80% of features are considered stable)	• Assess cause and areas of instability • Add permanent erosion control (rock, vegetation) in areas of erosion • Grade channel or shore to decrease velocity
	• Riparian vegetation cover and plantings are less than 80% coverage of area, and or survival of planted stock	• Apply seed and replacement plantings where required • Substitute species, and/or use soil amendments if conditions require.

8.0 REFERENCES

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