

Rouyn-Noranda, November 24, 2016

Ms. Marie-Renée Roy, Deputy Minister
Ministère du Développement durable, de l'Environnement
et de la Lutte contre les changements climatiques
Édifice Marie-Guyart, 30th Floor
675 René-Lévesque Boulevard East, Box 02
Quebec City, Quebec G1R 5V7

Subject: Request for Exemption to Chapter II of the Environmental Quality Act for Mining Exploration (Stripping and Trenches)

Dear Madam,

Mines Opinaca Ltd. (MOL) is hereby requesting an exemption to Chapter II of the *Environmental Quality Act (Loi sur la qualité de l'environnement - LQE)* for the project mentioned in the subject line.

1. Background

Following the assessment and review of environmental and social impacts by the Review Committee (COMEX), the Ministère du Développement durable, de l'Environnement, de la faune et des Parcs (MDDEFP) authorized the Éléonore mining project on November 10, 2011, through a Global Certificate of Authorization (Your Reference : 3214-14-042) in accordance with article 164 of the LQE.

The exploration activities of the gold-bearing deposits are to be carried out over the lifetime of the Éléonore Mine in order to identify precisely the extent and the nature of the deposits on the MOL property. These activities include notably stripping and trench-digging, some of which is to be carried out in wetlands.

MOL is requesting exemption to Chapter II of the *Environmental Quality Act*, in accordance with article 154 of this Act, for the mining exploration work (stripping and trench-digging) in the "Vieux-Camp" and "East" Sectors located at the border of the Opinaca Reservoir, situated respectively southwest and southeast of the current facilities.

2. Justification

Schedule A of the LQE, entitled *Projects Automatically Subject to the Assessment and Review Procedure*, specifies that "mining exploration projects are not automatically subject to the assessment and review procedure contemplated in sections 153 to 167".

Schedule B of the LQE, entitled *Projects Automatically Exempt from the Assessment and Review Procedure*, does not explicitly mention stripping and trench-digging activities although it specifies in paragraph g) that “all testing, preliminary investigation, research, experiments outside the plant, aerial or ground reconnaissance work and survey or technical survey works prior to any project” is automatically exempt from this procedure.

In the case that the planned stripping and test trenches by MOL in the “Vieux-Camp” and “East” Sectors are not automatically exempt from the Assessment and Review procedure contemplated in articles 153 to 167 of the LQE, MOL is submitting the present request for exemption to Chapter II of the LQE for these activities that will be carried out in 2017.

3. Description of Planned Activities

Location

The stripping and test trenches will be located in the “Vieux-Camp” and “East” Sectors.

The “Vieux-Camp” Sector is located at the edge of the Opinaca Reservoir, approximately 6 km southwest of the Éléonore Mine Ore Treatment Facility. More specifically, the activities will be located in the zone demarcated by points E01 to E09 on the “Vieux-Camp” Sector work location map enclosed with this request.

The “East” Sector is located at the edge of the Opinaca Reservoir, approximately 5 km southeast of the Éléonore Mine Ore Treatment Facility. More specifically, the activities will be located in the zone defined by points E01 to E12 of the “East” Sector work location map provided in the attachment. The “East” sector will be accessed by helicopter.

All of the site work will be carried out above the maximum operating level of the Opinaca Reservoir, fixed at an elevation of 215.8 m, but may be located inside wetlands.

Nature of Activities

The stripping and test trenches will be carried out using mechanical shovels. For the stripping, the objective is to excavate the layer of overburden to access or enlarge the rocky outcrops. For the test trenches, the work will include the excavation of the layer of overburden to examine the bedrock at the location of the boreholes.

The dimensions of the stripping will vary depending on the sites selected, but the maximum total area to be stripped is evaluated at approximately 1 hectare per sector, or 2 hectares total. The depth of the stripping will vary depending on the thickness of the overburden of the site selected from the exploratory testing. The maximum total volume excavated is estimated to be between 1000 and 2000 m³ per sector. The overburden excavated during stripping will be stored in a stockpile near the test site. These piles will be located more than 30 m from any water medium. They will be stabilized by vegetation sowing operations of indigenous and rustic plants in order to prevent their erosion through wind and rain.

The stripped area will then be washed with water in order to describe the rocky outcrops. Water will be sampled from the Opinaca Reservoir.

Test trenches will be carried out at the borehole locations. Their depths will be variable and a function of the thickness of the overburden and the technical limits of the excavator. The excavated overburden will be replaced in the trenches, by successive layers, respecting the original stratigraphy.

4. Description of the Environment

a. Use of the Environment

The “Vieux-Camp” and “East” Sectors are located at the border of the Opinaca Reservoir. They are located on Category III public land, more specifically on the Cree hunting territory VC29, a territory under the responsibility of Tallyman Angus Mayappo.

An aboriginal camp is located at approximately 1.5 km to the northeast of the “East” sector, where fishing activities are carried out in summer and in autumn in the surrounding water bodies. No aboriginal camp is currently located within or near the “Vieux-Camp” Sector.

MOL consulted several stakeholders in November 2016 concerning the present project, including the Tallyman of the trapping territory VC29, Angus Mayappo and his partner, Stephanie Georgekish, as well as Johnny Mark, director of Environment of Wemindji and user of trapping territory VC29. These consultations allowed for the determination that no archeological site, no burial ground nor any other site of interest was identified within or in proximity of these two sectors. Additionally, no land in these sectors is registered as an ecological reserve.

b. Biological Environment

Vegetation and Wetlands

The Éléonore site is located in the Boreal taiga. The vegetation found in these two sectors is principally comprised of slashed-and-burned black pine forest regenerated with grey pine.

No flora inventory was carried out in the two sectors for the requirements of the present project. However, the aerial photographs suggest the presence of wetlands in this sector. These wetlands are in all likelihood ombrotrophic peatlands, the type of wetland that is dominant in the Éléonore Mine sector. Additionally, according to the flora inventories carried out in 2002, 2008 and 2015 in the Éléonore Mine Sector (Golder, 2010 and Englobe, 2015¹), no special status flora species was identified in this area.

¹ ENGLOBE, 2015. Mine Éléonore. Inventaires biophysiques. Rapport d'étude. N/Réf. : 046-2344-1-EN-R-0002-0B.doc. Préliminaire. August 2015.

Wildlife

Amongst mammals that can be found in these two sectors are moose, caribou (tundra and forest), wolf, black bear, beaver, as well as certain mustelidae such as otter, weasel, stoat, fisher, marten and mink. Additionally, several micromammals belonging to the genus of common wood mouse, shrew, vole and lemming may be present (Golder, 2010).

Amongst amphibians and reptiles, the wood frog, the northern frog, the American toad and the common garter snake are species that may be present (Golder, 2010).

Finally, a number of species of birds were listed in the Éléonore Mine Site belonging to different groups of waterfowl, shoreline birds, forest birds or birds of prey. Amongst these birds, two species are designated to be vulnerable according to the *Act respecting threatened or vulnerable species*: the bald eagle (*Haliaeetus leucocephalus*) and the peregrine falcon (*Falco peregrinus*) (Golder, 2010). However, the two sectors are not favorable to nesting of the bald eagle as the trees on the rim of the bay of the Opinaca Reservoir are not of sufficient size to support a nest of this species (Englobe, 2015), nor of the peregrine falcon as this species normally nests on the edge of a cliff or in a crevice, and sometimes on the ledge of a large anthropogenic structure (COSEPAC, 2007²).

5. Impacts of the Project and Attenuation Measures

a. Impacts on the Communities

No impact is expected in the “Vieux-Camp” Sector in that no archeological site or aboriginal camp has been identified in this area.

As for the “East” Sector, an aboriginal camp is located at approximately 1.5 km from the eastern limit of the site work; thus, stripping and test trench activities will not affect the fishing activities that may take place in the water bodies near the camp.

b. Impacts on the Physical Environment

Air Quality and Noise

Impacts on air quality will be caused by emission of exhaust gas from mechanical shovels and all-terrain vehicles.

Additionally, the projected site work will temporarily affect the noise environment in both sectors from vehicular traffic, machinery and use of mechanical tools. Give the short duration of the work

² COSEPAC, 2007. Évaluation et Rapport de situation du COSEPAC sur le Faucon pèlerin (*Falco peregrinus*) de la sous-espèce pealei (*Falco peregrinus pealei*) et anatum/tundrius (*Falco peregrinus anatum/tundrius*) au Canada – Mise à jour. Comité sur la situation des espèces en péril au Canada. Ottawa. viii + 55 p.

(spring and summer) and their location at around 1.5 km from any camp, no significant impact is expected for this project in terms of noise.

Water and Soil Quality

Water from the washing of the outcrops will be loaded with suspended solids that could potentially flow towards the Opinaca Reservoir or a wetland. If needed, the wash water can be captured around the stripped area then directed to the vegetation zone sufficiently far from any body of water or wetland to allow for the settling of suspended solids.

The use of machinery and hydrocarbon-fed equipment is likely to bring about losses, leaks or accidental spills. In the event that such events occur, the soil, surface water and groundwater could be contaminated.

The machinery used on the sites will be inspected regularly. Spill kits will be present at all times on the work sites and procedures for accidental spills will be implemented.

c. Impacts on the Biological Environment

Vegetation and Wetlands

The activities will make necessary the clearing of vegetation and possibly impinge upon the wetlands. The specific areas are not yet known, but the planning of the work and the selection of stripping sites will aim to limit the areas of wetlands encroached upon.

Wildlife

The clearing of vegetation and forests will bring about disruptions in the habitat of avian wildlife as well as small mammals. These impacts will be limited since the deforested surfaces are minimal compared to the area of the natural environment.

Concerning large mammals, they occupy territories of much larger areas than that which will be disturbed by the activities in sectors “Vieux-Camp” and “East”. Thus, no impact is expected for large wildlife.

Additionally, no impact on the fish habitat is expected as the site work will be carried out at all times above the high water line that corresponds to the maximum operation line of the Opinaca Reservoir (elevation of 215.8 m).

6. Timeline

The stripping work and the test trenches in the Vieux-Camp and East Sectors are planned to start in the spring of 2017, pending the reception of the attestation of exemption from Chapter II of the LQE and with any other authorization required in compliance of Chapter I of the LQE.

For more information, please communicate with the undersigned, at the following number: (819) 865-4007.

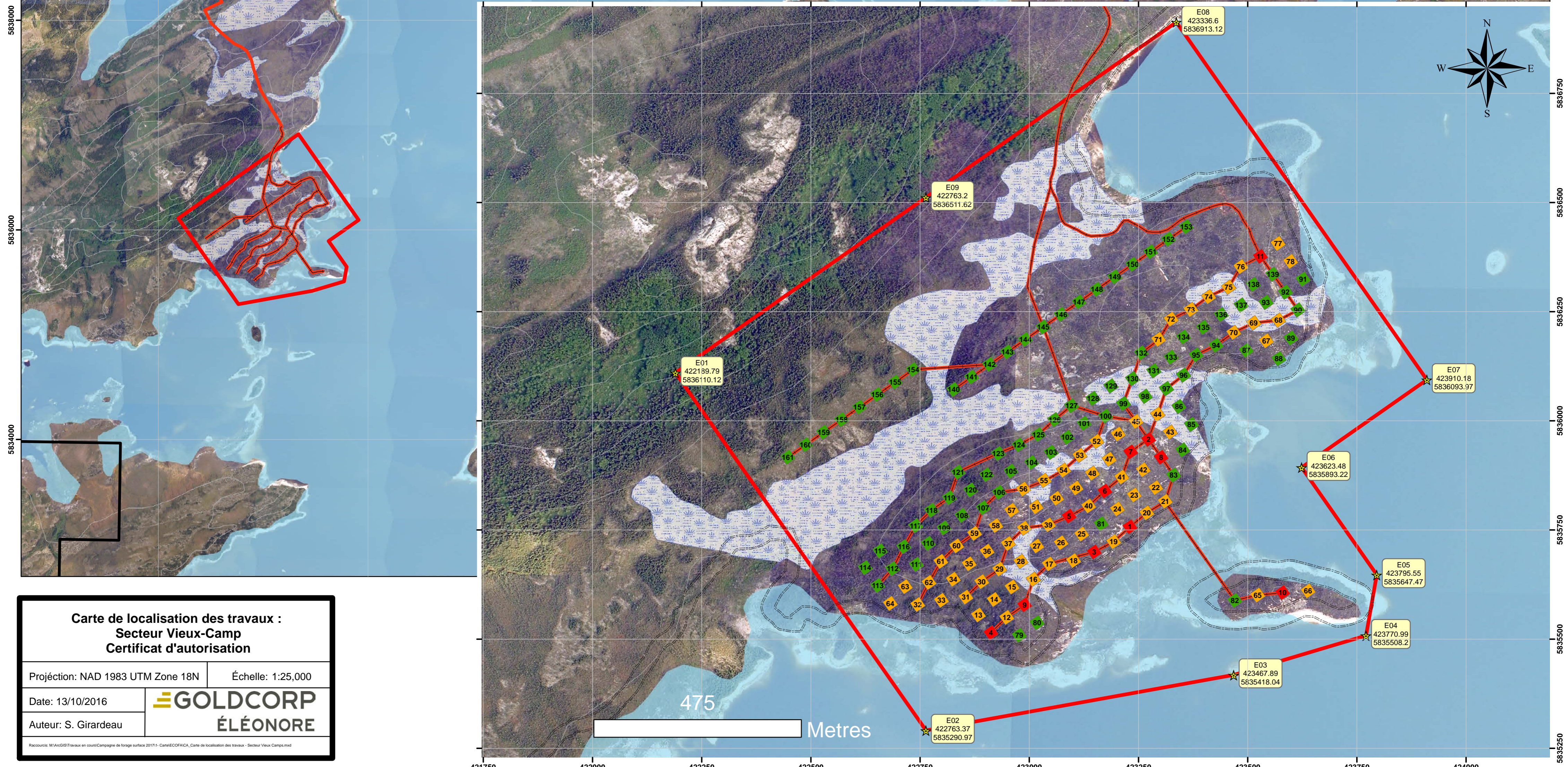
Yours truly,

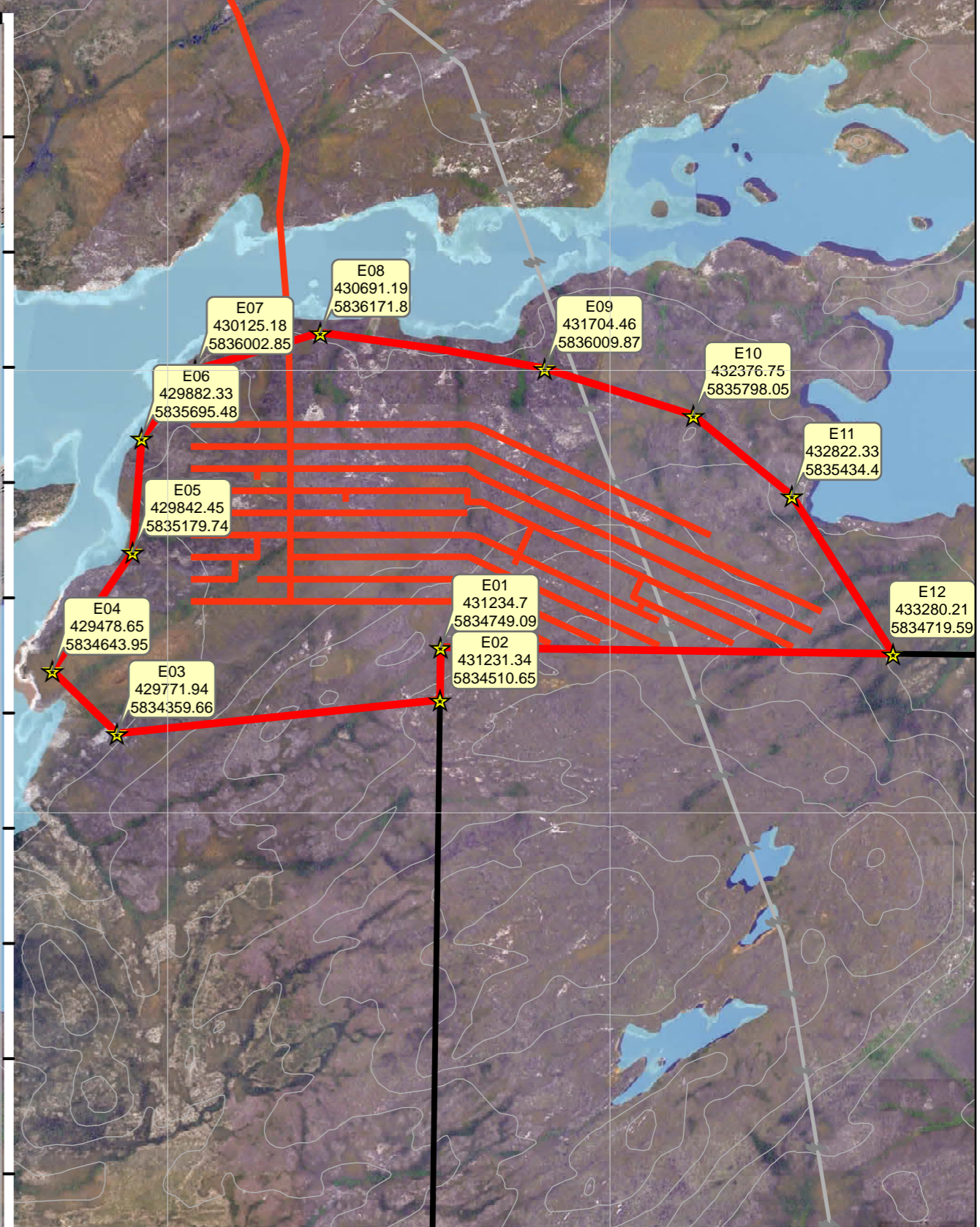
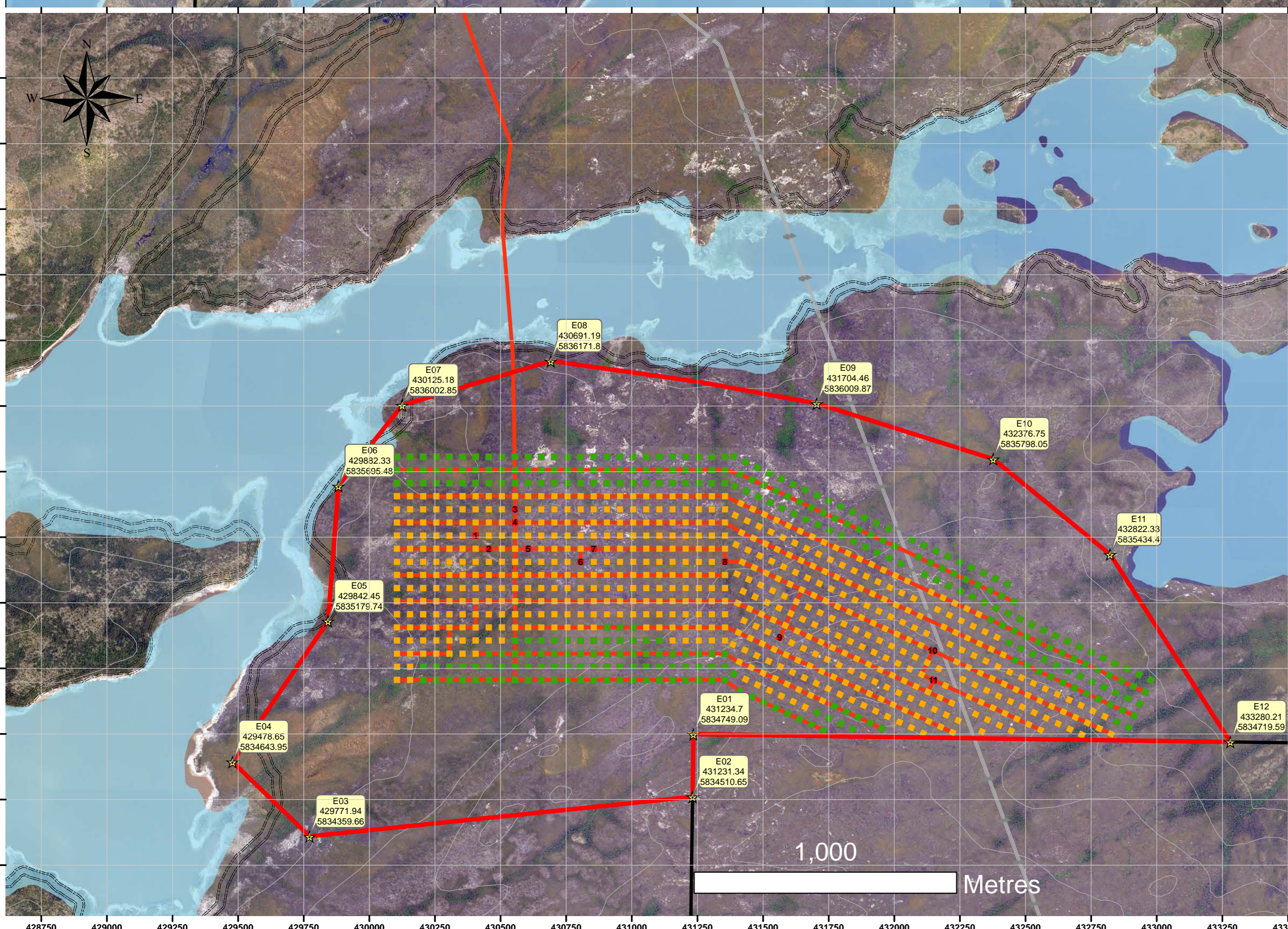


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encl. Check for \$1,366.00
Work Location Map: Vieux-Camp Sector
Work Location Map: East Sector

c.c. (By E-mail)
Ms. France Trépanier, Les Mines Opinaca Ltd. – Goldcorp
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Ms. Mireille Paul, MDDELCC
Document Control





**Carte de localisation des travaux :
Secteur Est
Permis d'intervention**

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|-----------------------------------|------------------------------------|
| Projection: NAD 1983 UTM Zone 18N | Échelle: 1:25,000 |
| Date: 05/11/2016 | GOLDCORP ÉLÉONORE |
| Auteur: S. Girardeau | |

Raccourcis: M:\ArcGIS\Travaux en cours\Campagne de forage surface 2017-1 - Carte\ECOFAPR_Carte de localisation des travaux - Secteur Est.mxd