



Benz Mining Corp
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October 26, 2021

Madam Vanessa Chalifour

Ministère de l'Environnement et de la Lutte contre les changements climatiques
Direction de l'évaluation environnementale des projets industriels, miniers, énergétiques et nordiques
Édifice Marie-Guyart, 6^e étage
675, boulevard René-Lévesque Est
Québec G1R 5V7

Purpose : Request For Exemption

Questions and Comments – Project to build and operate a landfill at the Eastmain Mine

Y/File 3214-16-081

Madam Chalifour,

Following receipt of your letter dated August 10, 2021, BENZ Mining has taken your comments into consideration and now wishes to develop an isolated landfill site (LETI) to manage the residual materials generated at the exploration camp at the Eastmain mine.

You will find attached 4 hard copies in English as well as 6 copies in French, and 3 USB keys of our answers to your questions, as well as additional details concerning the proposed layout.

QC—1

The construction of a trench landfill (LEET), by its size and the follow-up it requires, is generally preferred for projects involving a large production of residual materials associated with a large number of workers and projects with a longer lifespan than what is envisaged by the developer.

In this sense, the proponent must compare the different possible options: transportation of residual materials to another existing site, construction of a landfill site in isolated territory (LETI) or a LEET and any other option deemed relevant. In particular, it must detail the costs, advantages and disadvantages as well as the lifespan of each of the options. It must assess any other relevant sites that could accommodate a landfill site including sites developed during the previous operation of the mine in 1994 and 1995 that could now be used for this project.



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It must also specify whether it plans to carry out more comprehensive exploration work in the short or medium term, whether it plans to increase the capacity of the workers' camp and whether the duration of the project could be extended. It should be noted that if additional exploration work is planned, the proponent is invited to contact the Environmental and Strategic Assessment Branch to verify that its project is subject to the environmental and social impact assessment and review procedure.

Answer QC-1:

As mentioned earlier, for the needs of the current mining camp, a LETI is the appropriate type of landfill. Current exploration work will continue over the next few years for an indefinite period.

After some research to locate the location of the landfill used during 1994 and 1995 or even earlier, access to information requests were filed with the MELCC and mern (Appendix A). Unfortunately, no information is available, allowing us to locate if such a site has been set up.

An inventory of available options and advantages and disadvantages are presented in the following tables 1 and 2:

Table 1: Available Options for Waste Disposal

	Development of a LETI at the Eastmain site	LEET Mistissini	LEET Chibougamau	LEET Mine Renard	Site Matoush
Site authorized by the MELCC	Ongoing process	Yes	Yes	Yes	No MELCC access to information
Owner's permission	Yes, to the authorized site	Yes	Yes	No Stornoway Email	N/A
Capacity	As needed	According to manager	According to manager	According to manager	N/A
Selected options	Yes	Yes	Yes	Not	Not

Table 2: Advantages and disadvantages of possible options

	LETI Eastmain site	LEET Mistissini	LEET Chibougamau
Benefits	<ul style="list-style-type: none"> • Proximity to the site (<10 km) • Safer (less road transport) • Greenhouse gases (less transport) • Site Control • Sufficient capacity 	<ul style="list-style-type: none"> • Site already authorized • No site management • No environmental monitoring 	<ul style="list-style-type: none"> • Site already authorized • No site management • No environmental monitoring •
Disadvantages	<ul style="list-style-type: none"> • Maintenance responsibility • Responsibility restoration • Management of collection materials • Animal Control 	<ul style="list-style-type: none"> • Distance of more than 200 km to travel (one way only) • Safety for transport • Greenhouse gases (transport) • Risk that the owner no longer wishes to accept the waste 	<ul style="list-style-type: none"> • Distance of more than 300 km to travel (one way only) • Safety for transport • Greenhouse gases (transport) • Risk that the owner no longer wishes to accept the waste

Despite the associated disadvantages, the development of a LETI is the option that offers the most advantages to the needs of the project, especially for the safety of workers.

QC-2

Preliminary information shows that an exploration camp can accommodate up to 45 people, generating approximately 5.2 metric tons of residual materials per year. Given the infrastructure surrounding the camp and the proximity of other existing landfills, the proponent must specify the type of residual materials it plans to eliminate and justify the choice of location of a new landfill.

The Eastmain mine was active in 1994 and 1995 and exploration work has been underway there since 2009. The proponent must indicate where and how the residual materials were managed at the time and whether an existing site or sites could be used for this purpose. If such sites exist but cannot be used, the proponent must state the reasons.

Given that the Eastmain mine site is approximately 40 km north of the Matoush Uranium Exploration Project, the Proponent must indicate whether it has contacted International Consolidated Uranium or the rights holders of the facilities and whether the sharing of residual materials management infrastructure could be considered.



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Answer QC-2:

As discussed in the answer to question Qc-1, authorized sites are more than 100 km away or do not wish to accept waste from the mining camp. In its response to the access-to-information request, the MELCC mentions that Matoush had indeed initiated a request for a LETI, but that they did not go forward. (Appendix A).

Since exploration started at the mine site, waste has been trucked to the Chibougamau landfill. Since COVID-19, the amount of waste has increased.

QC-3

Since the majority of residual materials will be produced by the camp, the proponent must indicate whether it has considered the implementation of a recovery or composting process. Such a process would reduce the amount of residual materials to be buried. Where applicable, the proponent must provide information on the processes it plans to put in place.

Answer QC-3:

In order to reduce waste at the source, certain practices have been put in place. A recovery process is in place for cans and plastic bottles. However, BENZ does not intend to set up a composting system, in order not to attract animals to the vicinity of the camp.

Since the beginning of the pandemic, the amount of waste has increased. In the current context, the implementation of a recovery or composting program is not considered.

QC - 4.

The proponent indicates that it is possible to access the mineral exploration camp via Highway 167. The proponent must indicate whether one or more roads connecting Highway 167 and the camp have already been constructed. It must specify the exact location of the route of the paths.

Answer QC-4:

Roads to access the camp at the future landfill site are existing. Figure 1 shows the location of the Eastmain site (Appendix B), while Figure 2 (Appendix C) shows the existing paths to access the camp and the future landfill.



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QC - 5.

Preliminary information is not sufficiently important to the biological environment. It is mentioned that the landfill site (LEET) is referred to in Article 49 of REIMR in relation of the necessary information to prevent or suppress invasion of harmful animals, in the vicinity of the LEET. Access to LEET by animals was also the main preoccupation of the trapper responsible for the sector which requested the installation of an electrical fence. Little information was provided concerning the construction of this fence. The promoter must provide detailed plans for the design of the site and its fence.

Answer QC-5:

A fence was required with the installation of a LEET. Now that the landfill will be an LETI, no fencing is planned. BENZ undertakes to comply with the requirements of Article 117 of the REIMR by proceeding at the end of each day of use to cover with a layer of soil or a layer of lime, or to be covered by means of a device to limit the release of odors, the spread of fire, the proliferation of animals or insects and the flight of light elements.

We would also like to mention that the waste will be stored in shipping containers at the camp before it is transported to the landfill to keep it out of the reach of the animals.

QC - 6.

Preliminary information suggests that deforestation of nearly 1 hectare of forest is necessary for the implementation of the LEET. The promoter intend to proceed to the necessary work fo the construction of the LEET the earliest possible, if possible in summer 2021. The promotor should indicate whether he intends to deforest starting mid-August. The majority of the passerines will have completed their nesting period and the bats will then begin their migrations. These animals will therefore be less vulnerable to mortality caused by tree felling.

Answer QC-6:

Benz has revised the dimensions of the landfill and no tree cutting will be required. The proposed site is devoid of trees on an area of 35 m by 60 m. The area of the LETI would be of the order of 850 m².

QC - 7.

The preliminary information does not contain information on potential wetlands and water bodies. In addition, the information provided by the promoter concerning the layout of the landfill site is partial and does not allow to verify its compliance with REIMR requirements. The proponent must therefore provide information on the wetlands and bodies of water in the sector where it intends to implement the LEET as well as the technical information to assess its compliance with the requirements of Section 3 of Chapter II of the REIMR. Studies to confirm that the chosen location is not problematic should also be provided.



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Answer QC-7:

Figure 2 shown in Appendix C provides information on wetlands and watercourses in the vicinity of the proposed LETI. The nearest wetland is located more than 500 metres west of LETI. A lake is located about 450 meters south of the LETI. There is no water catchment facility for human consumption within a radius of 2 km.

Test pits were excavated with a depth of 4 meters in May 2021, the water table was not encountered. The elevation of the land at the LETI location is 501 m, while the nearby lake is 496 m.

QC - 8.

Finally, it is important to remember that burning in a LEET and in a LETI is prohibited south of the 55th parallel.

Answer QC-8:

BENZ Mining is committed to respecting the prohibition of burning in a LETI.

Yours sincerely,

A handwritten signature in blue ink, appearing to read "Danielle Giovenazzo".

Danielle Giovenazzo
Vice President Exploration
Benz Mining Corporation



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Appendix A

Correspondence with MERN and MELCC

juligravel@hotmail.com

De: Secteur municipal - Abitibi-Témiscamingue et Nord-du-Québec <municipal.drae08-10@environnement.gouv.qc.ca>
Envoyé: 26 août 2021 11:34
À: juligravel@hotmail.com
Objet: RE: Demande d'information pour le secteur municipal

**Environnement
et Lutte contre
les changements
climatiques**



Bonjour Madame Gravel,

Il n'y a pas de lieux d'enfouissement autorisés dans ce secteur. Il y a eu des demandes pour l'ouverture d'un lieu d'enfouissement des déchets en 2010 pour campement Matoush mais la demande ne semble pas avoir été poursuivie.

Les lieux les plus proche du secteur sont :

LEET Mistassini
LET Chibougamau
LEET Stornoway

Il y a aussi quelques campements le long de la route des Monts Otish mais leur Lieux d'enfouissement en territoire isolé sont spécifiquement conçus pour leur campement.

Vous devez prendre entente directement avec les lieux d'enfouissement pour connaître leur procédure d'acceptation des matières résiduelles.

N'hésitez pas à nous rejoindre si vous avez d'autres questionnements.

Bon jeudi!

Secteur municipal

Direction régionale de l'analyse et de l'expertise Abitibi-Témiscamingue et Nord-du-Québec

101 Boul Springer CP 160
Chapais (Québec) G0W 1H0
www.environnement.gouv.qc.ca

De : juligravel@hotmail.com <juligravel@hotmail.com>

Envoyé : 24 août 2021 14:14

À : Internet DR08 <abitibi-temiscamingue@environnement.gouv.qc.ca>

Objet : Analyse-industriel

Nom : Gravel, Julie

Téléphone : 438-498-8745

Courriel : juligravel@hotmail.com

Région : Nord-du-Québec

Municipalité : Gouvernement régional d'Eeyou Istchee Baie-James

Objet de la requête : Projet à réaliser, autorisation environnementale, interprétation règlementaire, permis ou certificat de pesticides

Secteur : Secteur industriel (industrie, commerce, terrain contaminé, gestion des matières résiduelles)

dangereuses ou non, etc.)

Autres précisions sur la localisation :

Ancienne mine Eastmain et site d'exploration Matoush

Coordonnées de la mine Eastmain : E 698500, N 5798150 Zone 18

Coordonnées du site d'exploration Matoush : E 699250, N 5760600 Zone 18

Courte description de la demande :

Recherche la localisation d'anciens ou actuels sites d'enfouissement à proximité de la mine Eastmain

Question :

La mine Eastmain a été en opération seulement de 1994 à 1995, nous sommes à la recherche du site d'enfouissement s'il y en avait un et nous souhaitons savoir si au site Matoush il y a présence d'un ancien site d'enfouissement. Sinon, dans un rayon de 100 km, y a-t-il des sites d'enfouissement disponibles ?

Le 17 septembre 2021

Madame Julie Gravel
996, Chemin Francisco
Rivière-Rouge (Québec) J0T 1T0
juligravel@hotmail.com

N/Réf. : 21-08/059-ME

Objet : Décision - Demande d'accès à l'information

Madame,

Nous faisons suite à votre demande d'accès à l'information reçue le 30 août 2021.

Nous avons le regret de vous informer que nous ne pouvons vous transmettre le document demandé.

En effet, tel qu'édicté par l'article 14 de la Loi sur l'accès aux documents des organismes publics et sur la protection des renseignements personnels (RLRQ, chapitre A-2.1), ci-après Loi sur l'accès, nous ne vous transmettons pas le document dont les renseignements non accessibles en forment la substance, lesquels sont visés par les articles 23 et 24 de cette même loi.

Conformément à l'article 51 de la Loi sur l'accès, nous vous informons que vous pouvez demander la révision de cette décision auprès de la Commission d'accès à l'information. Vous trouverez ci-annexée une note explicative concernant l'exercice de ce recours ainsi qu'une copie des articles précités de cette loi.

Veuillez agréer, Madame, l'expression de nos sentiments les meilleurs.

La responsable de l'accès à l'information,



Diane Barry

p. j.



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Appendix B

Location of the Eastmain mine

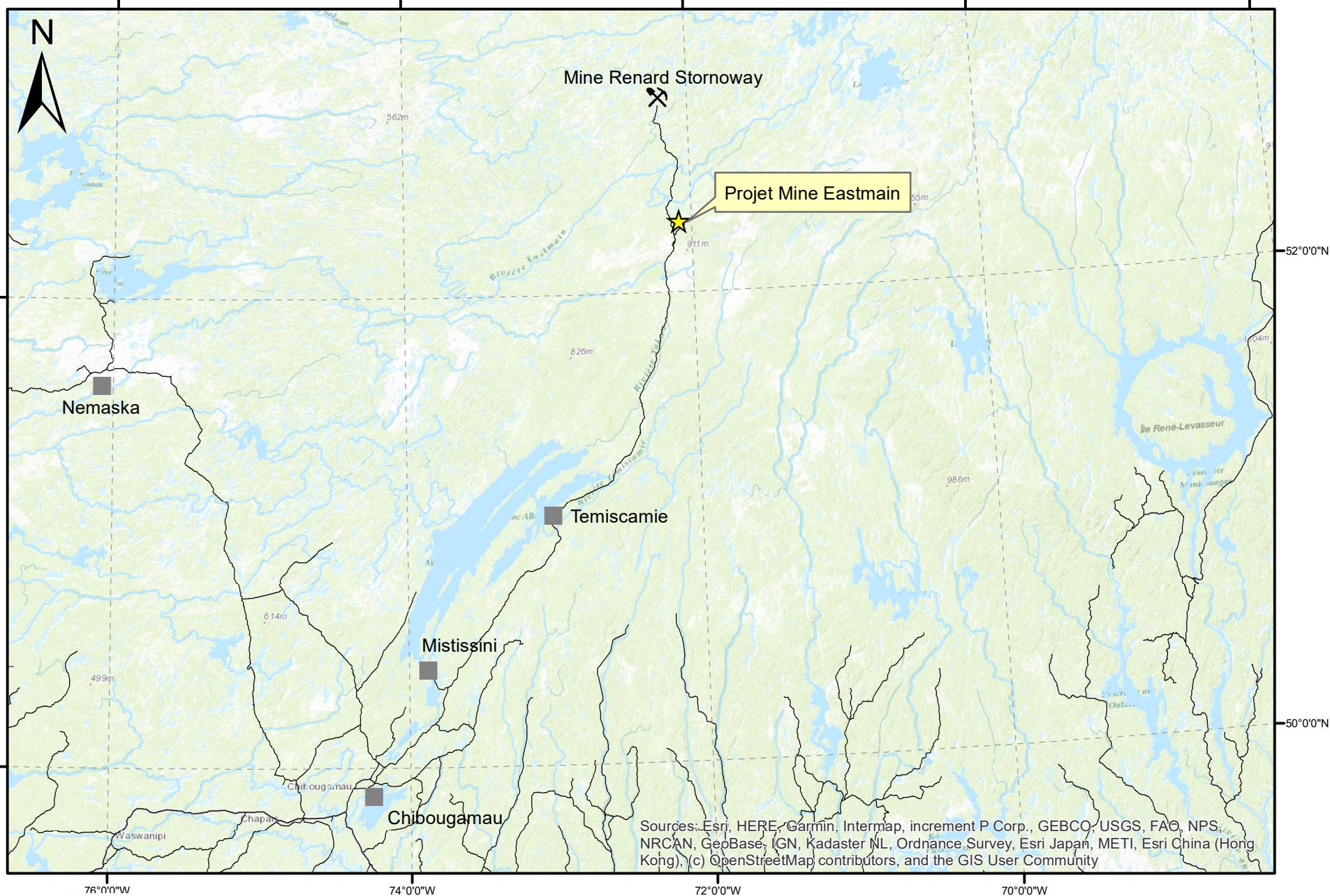


Figure 1. Localisation du projet Mine Eastmain



Geographic Coordinate System: GCS_North_American_1983

Date: 2021-09-24

0 25 50
Kilometers

Dessin par: Renée Turmel, géo. (OGQ# 1013)

Legende

- ★ Projet Mine Eastmain
- Route
- Surfaces hydrographiques
- Continuité de l'écoulement



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Appendix C

Wetlands near LETI

