

May 17, 2022

By email only

**Subject: Clarification on response to Undertaking #31**

Dear Jeremy Dart and Tracy Zanini,

The Panel appreciates the joint engagement of GenPGM and Biigtigong Nishnaabeg First Nation in the preparation of the response to Undertaking #31 and recognizes the effort of both parties in preparing this submission. The Panel would appreciate clarification on the following.

In the response to Undertaking 31 (CIAR #1276, PDF 77), under “Discharge from Pit”, the document reads:

*“During operations, GenPGM commits to use the water collection system for the Process Solids Management Facility (PSMF) to allow water to move south from the Pit to be managed within the PSMF.”*

However, in the response to IR4-5 (CIAR #950, PDF2) GenPGM indicated the following:

*“Seepage from the base of the MRSA [will] either flow west and be collected in the open pits and (sic) flow towards the east along the Stream 2 and Stream 3 drainages, shown in Drawing 110 of the Site Water Balance Summary (EIS Appendix D5 of the EIS Addendum [Vol 2]). The Stream 2 and Stream 3 Catch Basins will be constructed within the Stream 2 and Stream 3 drainages to collect seepage from the east side of the MRSA. Water collected in the open pits and MRSA Catch Basins will be transferred to the Water Management Pond during operations. Water from the Water Management Pond will be used in the Process Plant. Excess water from the Water Management Pond will be treated and discharged to Hare Lake.”(emphasis added)*

In consideration of the information presented above, the Panel requests clarification on the commitment regarding discharge from the pit. Specifically, can GenPGM and Biigtigong Nishnaabeg First Nation reconcile for the panel the two apparently differing statements contained in Undertaking #31 (CIAR #1276, PDF 77) and in the response to IR4-5 (CIAR #950, PDF 2).

Please feel free to provide your response in writing or within your closing remarks.

If you have any questions or concerns, please contact Jason Patchell, Acting Panel Manager at [marathonminereview-examenminemarathon@iaac-aeic.gc.ca](mailto:marathonminereview-examenminemarathon@iaac-aeic.gc.ca).

Sincerely,

<Original signed by>

Debra Sikora  
Panel Chair