

Appendix J.6

Assessment of Alternatives for Storage of Mine Waste Fifteen Mile Stream Gold Project, Wood Environment & Infrastructure Americas.



Assessment of Alternatives for Storage of Mine Waste

Fifteen Mile Stream Gold Project Trafalgar, Nova Scotia ONS2001

Prepared for:

Atlantic Mining NS Inc.

409 Billybell Way, Mooseland Middle Musquodoboit, Nova Scotia B0N 1X0

October 2020



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October 23, 2020

Mr. James Millard Manager, Environment and Community Atlantic Mining NS Inc. 409 Billybell Way Mooseland Middle Musquodoboit Nova Scotia, BON 1X0

Dear Mr. Millard

Wood Environment & Infrastructure Americas is pleased to submit the attached Assessment of Alternatives for the Storage of Mine Waste for the Fifteen Mile Stream Gold Project issued to support the Environmental Impact Statement.

This report outlines the alternatives considered for the storage of mine waste (mine rock) for the Fifteen Mile Stream Gold Project, using the multiple accounts assessment methodology required by Environment and Climate Change Canada, in accordance with the *Guidelines for the Assessment of Alternatives for Mine Waste Disposal*. Several storage locations / configurations were considered from the outset prior to arriving at the conclusions herein.

We greatly appreciate the opportunity to provide support for your Fifteen Mile Stream Gold Project. Should you have any questions regarding the study, please do not hesitate to contact us.

Sincerely,

Wood Environment & Infrastructure Americas a Division of Wood Canada Limited

Prepared by:
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Reviewed by:

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Assessment of Alternatives for Storage of Mine Waste

Fifteen Mile Stream Gold Project Project Location ONS2001

Prepared for:

Atlantic Mining NS Inc. 409 Billybell Way, Mooseland Middle Musquodoboit, Nova Scotia B0N 1X0

Prepared by:

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Executive Summary

The Fifteen Mile Stream (FMS) Gold Project is a proposed open pit mine to be operated by Atlantic Mining NS Inc. (Atlantic). The FMS Gold Project is located at the eastern boundary of Halifax County, central Nova Scotia, approximately 95 kilometres (km) northeast of Halifax.

The FMS Gold Project involves a conventional truck-shovel open pit mine and a 5,500 tonnes per day (tpd) processing plant. Ore will be processed on site at a nominal production rate of approximately 5,500 tpd to produce gold concentrate for shipment offsite. The mining and processing of ore will produce approximately 13.4 million tonnes (Mt) of tailings and 24.4 Mt of waste rock over a mine life of approximately seven years. Tailings will be managed in a Tailings Management Facility (TMF), impounded by embankments constructed using a combination of run-of-mine non-potentially acid generating (NPAG) waste rock from open pit mining methods, and low-permeability glacial till material, sourced from local borrow sources.

At Atlantic's request, Wood Environment & Infrastructure Americas (Wood) has prepared this document to satisfy the requirements of Environment and Climate Change Canada for an assessment of alternatives for mine waste disposal, pursuant to a regulatory amendment of Schedule 2 of the *Metal and Diamond Mining Effluent Regulations* (MDMER). This report is being submitted as part of the revised environmental impact statement in response to the Impact Assessment of Canada's information requests.

This document outlines the potential tailings technology, tailings storage locations, selection criteria and methodology used to identify preferred alternatives for the management of tailings. A multiple accounts analysis (MAA) following the methodology outlined in the Guidelines for the Assessment of Alternatives for Mine Waste Disposal (Guidelines, Environment Canada 2011; as modified 2013) has been used to examine and compare different components and effects from mine waste storage, and to provide a decision-making tool which is transparent and defensible. Sensitivity analyses are provided to test the robustness of the MAA. The sensitivity analyses allow for different weightings of key MAA components and to evaluate differing values on potential environmental, technical, economic and social impacts.

Seven storage location candidates for the TMF and seven storage methods candidates for tailings deposition were considered. The pre-screening assessment identified six TMF alternatives (consisting of a combination of four locations and two tailings technologies) which were advanced for further consideration in the multiple accounts analysis. An additional alternative was included as an adjustment to one of the identified locations (Location #4) to avoid overprinting fish frequented waters. The analysis concluded that the preferred TMF alternative was Alternative B, which considers conventional slurry tailings disposal, in a TMF located to the east of the open pit (Location #4). This alternative will overprint a small headwater tributary to East Lake, which may require listing to Schedule 2 of the MDMER.

Sensitivity analyses were conducted to test the robustness of the assessment and the following scenarios were considered through the sensitivity analysis:

- Base case (prioritize environment, minimize project economics);
- All accounts weighted equally (reduce weighting bias);



- All accounts, sub-accounts and indicators weighted equally (remove weighting bias);
- Prioritize people, environment strongly considered (Socio-economics account weighted six, environmental account weighted four, technical account weighted two, project economics weighted one); and,
- Prioritize water (weight of all criteria related to water received a maximum weight).

The sensitivity analyses concluded that the results of the assessment would not be influenced by any of the scenarios listed above, with Alternative B remaining the preferred alternative in all scenarios.

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Glossary and Abbreviations

Acid Rock Drainage
Atlantic Mining NS Inc.
Committee on the Status of Endangered Wildlife in Canada
Fisheries and Oceans Canada
Environmental Assessment
Environment and Climate Change Canada
Environmental Impact Statement
Endangered Species Act
Fifteen Mile Stream
For the purpose of the environmental assessment, this is the infrastructure
footprint plus an associated buffer.
Greenhouse Gas
Guidelines for the Assessment of Alternatives for Mine Waste Disposal
Impact Assessment Act
Impact Assessment Agency of Canada
Multiple Accounts Analysis
Metal and Diamond Mining Effluent Regulations
Metal Leaching
Not Applicable
Neutralization Potential
Net Present Value
Species at Risk
Species at Risk Act
Fifteen Mile Stream Gold Project
Tailings Management Facility
Wood Environment & Infrastructure Americas

Units

H:V	ratio of horizontal units to vertical units
ha	hectares
km	kilometres
km ²	square kilometres
m	metres
m/s	metres per second
masl	metres above sea level
Mm	millimetres
Mm ³	million cubic metres
Mt	million tonnes
°C	degrees Celsius
t	tonnes
tpd	tonnes per day

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1.0 INTRODUCTION

1.1 Background

The Fifteen Mile Stream (FMS) Gold Project is a proposed open pit mine to be operated by Atlantic Mining NS Inc. (Atlantic). The FMS Gold Project is located at the eastern boundary of Halifax County, central Nova Scotia, approximately 95 kilometres (km) northeast of Halifax. The property covers the historic Fifteen Mile Stream Gold District and is centered at UTM Zone 20, 4999404 N, 538584 E (NAD 83 CSRS; Figure 1).

The FMS Gold Project involves a conventional truck-shovel open pit mine and a 5,500 tonnes per day (tpd) processing plant. Ore will be processed on site at a nominal production rate of approximately 5,500 tpd to produce gold concentrate for shipment offsite. The mining and processing of ore will produce approximately 13.4 million tonnes (Mt) of tailings and 24.4 Mt of waste rock over a mine life of approximately seven years. Tailings will be managed in a Tailings Management Facility (TMF), impounded by embankments constructed using a combination of run-of-mine non-potentially acid generating (NPAG) waste rock from open pit mining methods, and low-permeability glacial till material, sourced from local borrow sources (Figure 2).

Atlantic presented its preferred option (TMF Option #4, also referred to as Alternative B in this report) to Fisheries and Oceans Canada (DFO) and Environment and Climate Change Canada (ECCC), which have determined that a regulatory amendment to Schedule 2 of the *Metal and Diamond Mining Effluent Regulations* (MDMER) will be required because waters frequented by fish will be overprinted at this location (Figure 3)¹.

An Environmental Impact Statement (EIS) for the Project was submitted to the Impact Assessment Agency of Canada (IAAC) in October 2019. IAAC determined that the EIS did not meet conformity requirements in November 2019. Based on the outstanding conformity requirements, and direction from the IAAC, additional information has been incorporated into the EIS, which is to be submitted in 2020.

At Atlantic's request, Wood Environment & Infrastructure Americas (Wood) has prepared this document to satisfy the ECCC requirement for an assessment of alternatives for mine waste disposal, pursuant to a regulatory amendment of Schedule 2 of the MDMER. This report is being submitted, as part of the EIS, to support the assessment of alternatives for the Project.

This document outlines the potential tailings technologies, storage locations, selection criteria and methodology used to identify preferred alternatives for mine waste storage (tailings). A multiple accounts analysis (MAA) following the methodology outlined in the Guidelines for the Assessment of Alternatives for Mine Waste Disposal (Guidelines, Environment Canada 2011; as modified 2013) has been used to examine and compare different components and effects from mine waste storage, and to provide a decision-making

¹ The determination of fish habitat for the purposes of the environmental assessment (as shown in Figure 3) was based on sitespecific information delineated for the effects assessment. However, for the purposes of the Alternatives Assessment, it should be noted that the calculation of overprinted fish habitat (waterbody and watercourse) was based on provincially available data for all locations in order to allow comparison amongst the alternatives.



tool which is transparent and defensible. Sensitivity analyses were completed to remove bias and subjectivity from the assessment, and to test the robustness of the MAA. The sensitivity analyses allow for different weightings of key MAA components and to evaluate differing values on potential environmental, technical, economic and social impacts.

1.2 Tailings Production and Storage Requirements

Ore will be processed at a nominal production rate of approximately 5,500 tpd in an on-site processing plant. Processing at the FMS Mine Site will create two concentrate streams; a gravity concentrate and a float concentrate, resulting in approximately 13.4 Mt of tailings produced over the mine life. There will be 24.4 Mt of waste rock produced over a mine life of approximately seven years.

The gold concentrate produced at the FMS Gold Project will be transported to the Touquoy Mine site for further processing into gold doré bars using the existing carbon-in-leach (CIL) processing facility. Tailings generated from this processing at the Touquoy Mine site will be deposited into the exhausted Touquoy pit. All other aspects of the Touquoy Gold Project will remain as assessed and approved through the Nova Scotia environmental assessmenet process in 2008 and as approved and regulated under the Touquoy Industrial Approval under the Nova Scotia *Environment Act*.

Tailings deposition and storage for the FMS Gold Project is a key component for the operations and longterm closure strategy for the Project. The proposed TMF is located to the east of, and up-gradient from, the open pit. Positioning the TMF in this manner allows the mine facilities to be situated upstream of the open pit, simplifying surface water and groundwater management requirements for the FMS Project. The tailings slurry will be conveyed to the TMF by pipeline and deposited on a subaerial tailings beach from discharge points located along the embankment crest. A portion of a fish-frequented waterbody (WC39) will be overprinted by the TMF.

1.3 Assessment of Alternatives Overview

Under the MDMER, tailings are considered mine waste and cannot be deposited in natural fish-bearing waterbodies. However, the MDMER also includes a provision to designate natural waterbodies as tailings impoundment areas for the management of mine waste, as described below.

Per the *Guidelines for the Assessment of Alternatives for Mine Waste Disposal* (Guidelines; Environment Canada 2011, as modified 2013):

The MDMER stipulates that for mine waste to be deposited in a natural, fish-bearing waterbody, the waterbody must be listed in Schedule 2 of the Regulations, designating it as a tailings impoundment area (TIA). In the context of these guidelines, a TIA is a natural waterbody frequented by fish into which tailings, waste rock, low- grade ore, overburden and any effluent that contains any concentration of the deleterious substances specified in the MDMER, and of any pH, are disposed.

Further, the Guidelines (Environment Canada 2016) states:



[It is] strongly recommended that this assessment be undertaken during the EA to streamline the overall regulatory review process and minimize the time required to proceed with the MDMER amendment process.

For this reason, Atlantic is providing the Assessment of Alternatives for Mine Waste Disposal report with the revised EIS in parallel with the Federal environmental assessment (EA) process, pursuant to the *Canadian Environmental Assessment Act, 2012.*

The purpose of this assessment of alternatives is to objectively and rigorously assess feasible options for mine waste disposal at the Fifteen Mile Stream Gold Project in accordance with the Guidelines. The assessment of alternatives is broken into the following seven steps in the Guidelines:

- Step 1. Identify candidate alternatives. Involves determining which methods and sites could be used for the storage of tailings.
- Step 2. Pre-screening assessment to screen out any alternatives which have a fatal flaw, ensuring at least one alternative does not overprint natural waters frequented by fish.
- Step 3. Alternative characterization. Characterize the alternatives from environmental, technical, project economics and socio-economic perspectives.
- Step 4. Multiple-accounts ledger. The beginning of the MAA and includes setting up a ledger of evaluation criteria and measurement criteria (sub-accounts and indicators respectively).
- Step 5. Value-based decision process. Each sub-account and indicator is assigned a value and weighted in importance (valuating, weighting and quantitative analysis).
- Step 6. Sensitivity analysis. An analysis that adjusts weightings utilized in the value-based decision process to manage bias and subjectivity, recognizing that not all stakeholders will place the same importance on each effect.
- Step 7. Document results. To improve readability of this document, the assessment of alternatives has been structured into six sections that reflect the above steps (Sections 5.0 to 10.0). Results for each step are documented in the corresponding section.

1.4 Additional Environmental Assessment and Regulatory Requirements

The Federal Regulation *Designating Physical Activities*, under the *Canadian Environmental Assessment Act*, 2012 (CEAA 2012), identifies the physical activities that constitute designated projects that could require completion of a Federal environmental assessment (EA). It was determined that the following section may have some relevance to the Project:

16 (c) The construction, operation, decommissioning, and abandonment of a new rare earth element mine or gold mine, other than a placer mine, with an ore production capacity of 600 t/day or more;



On May 22, 2018, Atlantic submitted a Project Description to IAAC for the FMS Gold Project. On July 16, 2018, IAAC decided that a Federal environmental assessment is required for the FMS Gold Project pursuant to the CEAA 2012 and commenced the EA on July 17, 2018.

The Provincial *Environmental Assessment Regulations* made under Section 49 of the *Environment Act* regulates the Government of Nova Scotia's EA process. Projects that trigger the EA process are sub-divided into two classes – Class I and Class II. The Project triggers a Class I EA in accordance with Schedule A, Section B (1a) of these regulations, as it is a project which involves:

A facility that extracts or processes metallic or non-metallic minerals.

Many of the provincial permits anticipated to be required for the Project are regulated in accordance with the *Activities Designation Regulations* made under Section 66 of the *Environment Act*. An Industrial Approval (IA) will be required in accordance with Section 16(2d) of these regulations, as it is a project that involves:

A surface mine where an opening or excavation is made in the ground from the surface which may require the use of explosives for the purpose of procuring any mineral bearing ore, including coal, and any associated infrastructure.

The IA process, known as Part V of the *Environment Act*, seeks to guide the Proponent in determining the way in which a project, after EA Approval, is to be monitored for compliance targets, objectives set through the EA process, and commitments made by proponents through various means such as public and Indigenous Peoples consultation.

Other activities required to facilitate the Project, including wetland and watercourse alteration and groundwater and surface water withdrawals, may require approvals in accordance with these regulations as well. These permitting requirements will be initiated once EA approval has been received from the province.



2.0 ENVIRONMENTAL CONDITIONS

The following sections provide a summary of the existing conditions for the FMS Gold Project. For further details, please refer to the Fifteen Mile Stream Gold Project Environmental Impact Statement (Atlantic Gold 2020).

2.1 Regional and Local Setting

The FMS Gold Project is located in a remote area of central Nova Scotia. The area is somewhat removed from the immediate climatic influence of the Atlantic Ocean and is characterized by warmer summers and cooler winters. The Project is located in the eastern ecoregion of Nova Scotia, which has a variety of landforms. The bedrock is highly visible in those areas where the glacial till is very thin. Where the till is thicker, the ridged topography is masked, and thick softwood forests occur (Neily et. al, 2003). The Project Area (PA) is comprised of disturbed areas from clear cutting and historical mining activities. On the shallow soils, repeated fires have reduced forest cover to scrub hardwoods with scattered conifers underlain by a dense layer of vegetation. On the deeper, well drained soils, stands of red spruce will be found whereas on the crests and upper slopes, stands of tolerant hardwood occur. Several mapped wetlands occur within the Project Area, along with a peatland ecosystem (Figure 4). Eighty-nine bird species have been identified within the Project Area, including 22 species classified as priority bird species. Thirteen mammal species were observed during field surveys. *Species at Risk Act* (SARA) listed species include Canada warbler (SARA, Threatened), Common Nighthawk (SARA, Threatened), Olive-sided Flycatcher (SARA, Threatened), Evening Grosbeak (SARA, Special Concern), Eastern Wood-Pewee (SARA, Special Concern) and Rusty Blackbird (SARA, Special Concern) and Blue Felt Lichen (SARA, Special Concern).

The Project is located in the East River Sheet Harbour Secondary Watershed, a moderately-sized watershed. Project infrastructure is located within the Seloam Brook tertiary watershed. The aquatic ecosystem within the FMS Study Area is characterized by acidic conditions, typical for the East River Sheet Harbour Watershed. Aquatic productivity has been evaluated as low-moderate, which is also typical for the watershed and the region in which the watershed lies. Habitat complexity is generally low and provides low quality habitat for Brook Trout and White Sucker. Overall, fish habitat quality within the FMS Study Area has been evaluated as predominantly low.

The nearest regional center is Sheet Harbour, located 33 km to the south, which provide basic supply needs to surrounding farm, fishing and forestry communities, Halifax is located 100 km to the west of Sheet Harbour. The proposed mine is located approximately 10 km north of the nearest residence (Figure 5) along Highway 374 and 24 km from the nearest federal Mi'kmaq community (Beaver Lake IR and Sheet Harbour IR). This area has very few permanent and seasonal cottages. The FMS Gold Project is situated within the Liscomb game sanctuary, and the closest wilderness areas is Toadfish Lakes, approximately 1.8 km south. The closest nature reserve is Abraham Lake which is 7 km west.



2.2 Physical Environment

2.2.1 Climate, Air Quality and Noise

The climate at the FMS Gold Project is characterized by a relatively moderate temperature regime that fluctuates between a typical low of approximately -6 °C in January and a high of 19 °C in July and August. Precipitation is greatest in the fall and winter months, and the proportion of snowfall in the winter months is less than 50%, further indicating the moderate climate conditions at the FMS Study Area. Potential evapotranspiration is about 40% of the total precipitation received on an average annual basis.

The Project is located in a relatively undeveloped rural region of Nova Scotia with very few industrial operations (occasional forestry operations) that would affect air quality. Ambient air concentration levels collected in 2004 in Seal Harbour (Nitrogen Dioxide (NO₂), Sulfur Dioxide (SO₂) and Particulate Matter (PM) less than 2.5 microns (PM_{2.5})), in 2016 at the National Air Pollution Surveillance station in Aylesford (PM_{2.5}), and ambient air concentration levels collected onsite (arsenic, mercury, total suspended particles and PM₁₀) were all found to be below the established Provincial regulations and objectives.

Background noise level (L_{90}), defined as the noise level which is exceeded 90% of the time was monitored and determined to be 25.9 dBA for the FMS Study Area. There is no evidence of seismic activity or volcanism naturally occurring in the area, and as a result, there were no ground vibrations recorded during the monitoring period.

2.2.2 Topography and Geology

The Project is located within the Eastern Ecoregion of the Acadian Ecozone, which is underlain primarily by quartzite and slate of the Meguma Supergroup. A variety of landforms are found in this ecoregion, including forest-covered rolling glacial till plains, drumlin fields, extensive exposed bedrock, and wetlands. Within this ecoregion, the Project is located within the Eastern Interior Ecodistrict, which is characterized by exposed or thinly covered bedrock with alternating ridge-and-valley topography. Where glacial till cover is thicker, the ridged topography is muted and covered by thick softwood forests. Glacial till thickness ranges from 1 to 10 m but averages less than 3 m within the ecodistrict, with the predominant soils being sandy loams, often quite stony and well drained, on glacial till (Neily et al. 2003).

The FMS Study Area site is bisected by Seloam Brook, which flows west from Seloam Lake to Fifteen Mile Stream. In turn, Fifteen Mile Stream flows southward into Anti-Dam Flowage which is the lowest elevation (approximately water level of 100 masl) in the Study Area. North of Seloam Brook, the topography is relatively flat and hosts numerous wetlands and intermittent watercourses, with elevations in the range of 110 to 120 masl. South of Seloam Brook, the topography is rolling, with fewer wetlands, and elevations that rise to 175 masl. Vegetation is dominated by stands of Balsam Fir, Spruce, Tamarack and Hemlock with isolated occurrences of hardwood.

The FMS Mine Site has been mined on several occasions beginning in 1868, and current soil and sediment quality throughout the Study Area is affected by the presence of historic waste rock and tailings. Mine tailings appear to be concentrated adjacent to Seloam Brook and range in thickness from 1.5 to 2.0 m.



Unprocessed waste rock is much more widespread within the FMS Study Area than tailings and found to have elevated concentrations of common heavy metals such as arsenic, iron and lead. Waste Rock Storage Areas (WRSA) were found present in the southwestern portion of the proposed open pit, along several trenches located to the south and east of the open pit and along the access road west of the proposed open pit. Historic tailings and waste rock were sampled within the FMS Study Area and the results of the analysis were compared to Tier 1 Environmental Quality Standards (EQS). This indicated that most metals were either not detected or were below Tier 1 EQS, but arsenic, lead and mercury were found to exceed Tier 1 EQS. Elevated arsenic concentrations are expected to be present across the FMS Study Area.

The FMS deposit is hosted in folded and faulted strata of the Moose River Formation within the axis and limbs of a north-dipping, overturned regional anticline. In this area, the anticline is commonly referred to as the Fifteen Mile Stream anticline; however, it may be equivalent to the Moose River–Beaver Dam anticline that hosts the Touquoy and Beaver Dam gold deposits to the southwest.

Within the FMS Study Area, the Moose River Formation is subdivided into several distinct units, which from youngest to oldest are:

- 1) Hanging Wall Turbidites: interbedded meta-sandstone and lesser meta-mudstone, locally hosting bedding-parallel quartz veins;
- 2) Orient Mudstone: green-grey, typically planar-bedded, silty meta-mudstone and siltstone, locally hosting pyrrhotite, arsenopyrite, and quartz veins;
- McLean Sandstone: meta-sandstone with minor interbedded meta-mudstone; the latter commonly hosting quartz veins;
- 4) Seigel Mudstone: light to dark grey planar-bedded, silty meta-mudstone that commonly hosts quartz veins and high concentrations of pyrrhotite and, locally, arsenopyrite; and,
- 5) Footwall Turbidites: meta-sandstone beds with minor mudstone intervals that locally host beddingparallel quartz veins.

The Orient and Seigel mudstones are the principal mineralized units, with lesser mineralization hosted by the McLean Sandstone and localized mineralization in folded Hanging Wall and Footwall Turbidites.

The rocks at the FMS Study Area have undergone regional chlorite–biotite greenschist facies metamorphism. Localized, hornfelsic, biotite porphyroblasts in meta-mudstone suggest that the rocks have also undergone localized contact metamorphism.

2.2.3 Geochemistry

Mine ore, waste rock and tailings were analyzed to determine the metal leaching / acid rock drainage properties (Atlantic Gold, 2018). The assessment included mineralogical analyses, acid-base accounting (ABA) tests, leach tests, Particle size distribution analyses, and humidity cell testing. Metallurgical tests undertaken provided representative tailings material for environmental static and kinetic testing. A summary of the key results includes:



- The FMS mine rock is composed primarily of quartz, feldspars, muscovite, biotite and chlorite. Pyrrhotite
 is the main sulphide mineral (up to 2.4 wt.%); however, significant pyrite is also present. Calcite is the
 main carbonate mineral present; humidity cell HC₄ contained significant calcite (9.8 wt.%) while the field
 bin subsample calcite content is 2.7%.
- Arsenic (As) is present as arsenic sulphide (arsenopyrite).
- The total sulphur (S) contents of the mine rock samples vary from 0.020% to 1.1%, including the ore samples. The median total S content of the ore samples is slightly higher relative to the median total S for the four main rock types (0.44 wt.% and 0.28 wt.% average, respectively). The majority of the total S is present as sulphide.
- The sulphide S contents, excluding the ore samples, range from 0.020% in a greywacke sample up to a maximum of 0.88% in an argillite sample, with median values falling between 0.18% (greywacke samples) and 0.35% (argillite samples). In the ore samples, the sulphide S contents range from 0.12% to 1.0% (median: 0.42%).
- The greywacke (GW) samples have the highest median modified Neutralization Potential (NP) value at 31 kg CaCO₃/t, while the argillite (AR) samples have the lowest median modified NP value (12 kg CaCO₃/t). The ore samples have a median modified NP of 16 kg CaCO₃/t, while the field bin subsample has a modified NP of 27 kg CaCO₃/t.
- Samples from the GW unit are generally non-potentially acid generating but samples from the other three lithologies and from the ore samples include Potentially Acid Generating (PAG) rock. There is a clear relationship of PAG% with the relative amount of argillite contained within the rock type: the argillite unit (<5% greywacke interbeds) shows the highest PAG proportion of 88%, while none of the greywacke samples are classified as PAG.
- Elements of potential concern based on the solid phase elemental analysis include Ag, As, Cu, Pb, Sb, and Zn. These elements, excluding Cu and Zn, are enriched by a factor greater than 10x above the average upper continental crust abundance (AUCCA) in one or more samples. Arsenic is elevated above 10x the AUCCA in all lithologies.
- The shake flask extraction (SFE) results indicate that As and Al are potential parameters of concern in runoff from the mine rock. Other parameters highlighted in the solid phase analyses were not above the federal water quality guidelines in the SFE leachate.
- Modelling results suggest that the NP will be depleted from the FMS mine rock between approximately 6 and 15 years. A conservative estimate for time to NP depletion for the static test samples indicates that approximately 50% of the PAG samples will become acidic within 10 years. This estimate does not consider the slower sulphide oxidation rates in colder temperatures, which would be expected to delay the onset of acid generation.



- The four tailings samples have variable but relatively low total S (0.085% to 0.25%), present dominantly as pyrrhotite. Using total S as a proxy to calculate acid potential, only one tailings sample is classified as potentially acid generating.
- Arsenic is the main parameter of concern in the tailings due to elevated concentrations in both the solid phase elemental analysis and in the SFE leachate. Arsenic concentrations increased over 18-week saturated column leachate test. The maximum As concentrations reached (0.35 mg/L) are 7 times the Canadian Council for Ministers of the Environment guideline.

2.2.4 Hydrogeology

Due to the relatively shallow depth to bedrock, and the low hydraulic conductivity of the bedrock unit, groundwater flow within the FMS Study Area is conceptualized as occurring mainly within the till, and upper (contact) portion of the bedrock. Site specific groundwater levels indicate that the water table is generally within the till or the upper few meters of the bedrock, supporting this conceptualization. Given the prevalence of wetlands and surface drainage features throughout the area, and the excess of the annual rainfall relative to evaporation, groundwater is likely to follow short localized flow paths, discharging to surface water features within proximity to areas of groundwater recharge. The degree of hydraulic connection amongst the smaller bedrock fracture systems is likely poor to moderate. There appears to be no large regional fault systems in the vicinity of the Project, and the smaller Seigel and Serpent faults do not appear to be capable of transmitting or storing large amounts of water (Atlantic Gold, 2020).

2.2.5 Hydrology

The FMS Gold Project is located in the East River Sheet Harbour Watershed is a moderately sized watershed, measuring at 57,666 hectares. The East River Sheet Harbour watershed is drained from north to south, connecting with the confluence with Fifteen Mile Stream and Twelve Mile Stream at Marshall Flowage, where it then drains south to the Atlantic Ocean at Sheet Harbour. Elevations within the watershed range from 210 masl in the headwater areas and gradually decreases to sea level (0 masl) at the final outlet at Sheet Harbour. The headwaters of the watershed are located along the topographic divide separating it from the St. Mary's Watershed to the northeast and the Liscomb River Watershed to the northwest. In the vicinity of the site, the Fifteen Mile Stream is the main mapped watercourse along with Seloam Lake and Anti-Dam Flowage as the major mapped waterbodies. The Seloam Brook tertiary watershed drains through the Project from northeast to west initiating in the tributaries of Seloam Lake that drains to Seloam Brook and into Fifteen Mile Stream and on to Anti-Dam Flowage. East Lake is located in the southeast corner of the FMS Study Area (Atlantic Gold, 2020).

The complex system of streams, lakes, bogs and wetlands is a direct result of the underlying bedrock geology, which creates relatively impermeable and poorly jointed rocks. This results in slow groundwater recharge and most of the excess surface water is retained on the surface, often called a 'deranged' drainage pattern. The regional hydrological station (St. Mary's River at Stillwater) indicate that the lowest flows occur during the summer months, which coincide with less precipitation and higher potential evapotranspiration. The consistency of flows through the winter months is supported by the presence of rainfall throughout the



winter that moves water through the watersheds rather than storing precipitation in snowpack. The average annual runoff estimated at this station is 1,002 mm, or about 70% of the total annual precipitation. The discharge peaks are attenuated to a large extent by the numerous hydroelectric dams and associated reservoirs owned and operated by Nova Scotia Power (NSPI) through which runoff is routed (Seloam Lake, Anti Dam Flowage, Marshall Falls, Malay Falls, Ruth Falls and the Barrier Dam).

2.2.6 Surface Water Quality

The surface water quality observed in the FMS Study Area is typical of lakes and watercourses that are present within the geological terrain of the southern mainland of Nova Scotia. The geology within this region is dominated by Cambrian-aged bedrock and the hydrology is strongly controlled by bedrock outcrops that create irregular flow patterns. Baseline water quality is naturally influenced by the water-rock interactions and the weathering processes associated with the bedrock and overburden, as surface water moves through the watershed (Atlantic Gold, 2020).

The baseline surface water quality at the stations monitored in the FMS Study Area can be generally characterized as having acidic to near-neutral pH, low alkalinity and hardness, and low concentrations of nutrients. Concentrations of most parameters were observed to be consistently below federal and provincial water quality standards, with the exception of aluminum, arsenic, iron, zinc, copper and mercury. Background environmental baseline concentrations of some parameters exceeding surface water quality criteria is not uncommon, including within areas that are relatively pristine and not disturbed. Exceedances of naturally occurring concentrations of aluminum and iron may be attributed to an association with common mineral phases in bedrock and overburden, whereas exceedances of arsenic may be attributed to naturally occurring processes associated with surface water/groundwater interactions with weathered bedrock containing arsenic-bearing sulphides (e.g., arsenopyrite).

2.3 Biological Environment

2.3.1 Vegetation

The FMS Study Area is located in the Eastern Ecoregion of the Acadian Ecozone and the Eastern Interior Ecodistrict. The overall landscape within the FMS Study Area comprised of historic mining, historical and current timber harvesting activities consisting of regenerative vegetation as well as undisturbed mature canopies. There are eight ecosite types identified within the FMS Study Area which are generally within the dry to fresh moisture regime, and poor to rich nutrient regimes. These ecosites generally support vegetation types from the spruce-pine (SP) and the mixedwood (MW) forest groups. Generally, SP forest groups are associated with a natural disturbance regime of fire, which leads to stands dominated by spruce understorey vegetation tolerant of acidic, nutrient poor conditions. MW forest groups are early to late successional mixedwood vegetation. This group can be quite variable and difficult to categorize. Vegetation is found on a range of slope positions and most sites are non-rocky. Soils are mainly derived from glacial till deposits. Within the FMS Study Area, the dominant ecosite is AC6 which is characterized by well drained soils and poor nutrient regime which supports conifer species which have a tolerance towards acidic soils (Atlantic Gold, 2020).



Within the FMS Study Area, the diversity of species is moderate to high, especially considering the low fertility of soils within the FMS Study Area. This is attributed to the range of habitat types encountered, from natural aquatic systems, a variety of wetland types, and both intact and disturbed upland habitats. A total of 277 species of vascular plants were identified within the FMS Study Area, in which the majority is native, although within disturbed areas exotic species were more prevalent. Of the 16 Vegetation Types (VT), the single most dominant type is Balsam Fir – Red Maple. Given the dominance of nutrient poor acidic soils, other predominant types include conifer species as the dominant canopy layer, with ericaceous shrubs as the herbaceous layer.

The infertile soil, low summer temperature and moderate precipitation (122-137 cm/annum) result in wetlands that accumulate peat from sphagnum growth and forests that have a well-developed bryophyte layer which leads to low nutrient availability and an accumulation of organic matter. Many of the resulting wetlands are fens and bogs with stunted tree flora of Black Spruce, Tamarack and Red Maple and a shrub layer consisting of ericaceous shrubs reflecting the low nutrient status and acidity of the soil. The upland forest is also typically boreal with the hallmark Black Spruce and fir trees in a mat of Schreber's moss, Feather moss and *Bazzania trilobata*. Despite the general low productivity of the forest and its largely boreal tree signature (e.g. Black Spruce, Balsam Fir and Tamarack), White Pine and Red Spruce do occur in the more drained and richer (drumlin) sites and large individuals of these and of Black Spruce are scattered over the site.

2.3.2 Wetlands

The FMS Gold Project lies on a watershed divide, where wetlands to the north drain into Seloam Brook, while wetlands present in the southeast portion flow east into East Lake. To the northern extent, the hydrological flow generally follows Seloam Brook from Seloam Lake in the northeast, and continues west towards Fifteen Mile Stream. Wetland 2 is the predominant wetland complex that exists along Seloam Brook. This system has many side channels and other associated wetlands and is fed by tributaries from the east, and from the south. Toward the southern extent, one drainage basin collects water from several wetlands and continues to drain outside of the FMS Study Area directly into Antidam Flowage. In total, the 274 delineated wetlands account for 210 hectares, representing a land cover of 16.6% within the FMS Study Area. While many wetlands are associated with those main watercourse systems, the vast majority of wetlands are isolated or are only hydrologically connected to others by drainage instead of regulated watercourses (Atlantic Gold, 2019).

Wetlands are grouped into swamps, bogs, fens and marshes, and must have at least 50% vegetation cover. Wetland habitats lacking vegetation cover in low flow are discussed in the aquatic biology section. Swamps (defined as wetlands with standing or gently moving seasonal water, with waterlogged mineral and organic substrate, and dense coniferous / deciduous forest and tall shrub thicket vegetation) represent the most abundant wetland type, accounting for 70% of all wetlands. The majority of swamps delineated within the FMS Study Area are under one hectare in size. Bogs (defined as peatlands, often raised relative to the surrounding landscape, with at least 40 cm of peat consisting of sphagnum moss, ericaceous shrubs and Black Spruce) account for 18% of all wetlands within the FMS Study Area, and 15% of the total wetland area. They range in size from 0.027 hectares to 4.825 hectares. Fens (peatlands with a very slow internal seepage



drainage and vegetation consisting of Black Spruce, Tamarack, sedges, grasses and various mosses) account for 3% of wetlands within the FMS Study Area, and 4% of the total wetland area. These wetland types ranged in size from 0.01 to 5.984 hectares. Wetland 2 (WL2) is a large wetland complex associated with Seloam Brook, that has been defined as a potential Wetland of Special Significance (WSS) due to an ACCDC record of Common Nighthawk (Nova Scotia *Endangered Species Act* (NSESA) and SARA threatened) (Atlantic Gold, 2020). It is dominated by low shrub fen habitat and disturbed by historic mine workings. The remaining wetlands are considered marshes, which are defined as periodically flooded areas with slow moving, nutrient-rich waters with mineral soil substrate, and characterized with emergent vegetation including reeds, rushes, sedges and the absence of woody vegetation.

Within these wetlands, evidence of mainland moose was observed, which may be foraging for aquatic vegetation during the summer as suitable habitat is present. Further, Blue Felt Lichen (special concern by SARA and COSEWIC, and vulnerable by the NSESA) was observed in several wetlands, typically in swamps or on the edges of wetland complexes growing on mature red maple. Suitable habitat for Blue Felt Lichen within wetlands is scattered throughout the FMS Study Area.

2.3.3 Wildlife

The FMS Study Area is located in a relatively remote, undeveloped landscape. The variety of both upland and wetland habitats identified throughout the FMS Study Area support a range of terrestrial fauna. Timber harvesting and associated forestry roads form the dominant land use pattern and disturbance regime within the FMS Study Area and the surrounding landscape. This land use within and surrounding the FMS Study Area has created edge habitats and openings in the canopy coverage to provide foraging opportunities for a variety of species (Atlantic Gold, 2020).

There were thirteen mammal species identified within the FMS Study Area, including Mainland Moose, American Black Bear, American Red Squirrel, Beaver, Bobcat, Coyote, North American Porcupine, North American River Otter, Red Fox, Short-tailed Weasel, Snowshoe Hare, vole spp., and White-tailed Deer. All of the mammal species are presumed to use parts of the site for foraging, breeding, denning, and raising young, at least periodically.

Herpetofaunal species within the FMS Study Area includes Common Garter Snake, Eastern American toad, Eastern smooth Green Snake, Green Frog, Northern Leopard Frog, Spring Peeper and Wood Frog. It is likely that other common herpetile species use habitat within the FMS Study Area, at least periodically, including Painted Turtle, Mink Frog, Pickerel Frog, Yellow-spotted Salamander, Northern Red-bellied Snake, and Northern Ring-necked Snake. Open-water wetlands and wetlands experiencing hydrological alteration soften provide breeding and foraging habitat for many herpetofauna species.

Of the 89 bird species observed during surveys within the FMS Study Area, 69 are protected under the *Migratory Bird Convention Act* (1994). Avian diversity and abundance is moderate to high in the area. A typical forest bird species assemblage was found in the FMS Study Area, along with birds typically found in interior forests. Passerines were the dominant species group across all seasons with non-passerine land birds such as Woodpecker and grouse species being the second most abundant group within the FMS Study Area. There were no large congregations of waterfowl or shorebird species within the FMS Study



Area. Raptors, both nocturnal and diurnal, were observed in low numbers with American Kestrel being the most abundant.

2.3.4 Species at Risk

The presence of wetlands, forested uplands, watercourses, clearings and fragmented habitats (resulting in edge habitats) provided suitable habitat for 22 priority bird species within the FMS Study Area (Atlantic Gold, 2020). However, only two probable breeding species were observed, including Canada Warbler (SARA – Threatened; NSESA – Endangered) and Olive-sided Flycatcher (SARA – Threatened; NSESA – Threatened).

Blue Felt Lichen (SARA – Special Concern; NSESA – Vulnerable) was observed within the FMS Study Area, within several wetlands and in upland habitat north of two wetlands. Blue Felt Lichen typically grows on mature Red Maple on the edge of swamps, lakes and rivers, but can also be found growing upland and on other hardwood species such as White Ash, Yellow Birch and Sugar Maple (COSEWIC, 2010).

Within the FMS Study Area, suitable habitat for Mainland Moose (NSESA – Endangered) is present at varying times of the year. Historical mining and timber harvesting have resulted in clearings, and subsequently, regenerative wood perennials which provide suitable foraging for moose in the winter months. Open waterbodies are also present which support aquatic vegetation which are often common foraging grounds for Mainland Moose in the summer months. In portions of the FMS Study Area, mature conifer stands also exist, which provide refuge for Mainland Moose during high snow fall events. Mainland Moose have been recorded within 12.7 km of the FMS Study Area, and evidence (scat and tracks) was observed in a range of habitats (including wetlands, cut blocks and access roads) within, and adjacent to the FMS Study Area during the collection of baseline environmental data.

With respect to other SAR from other groups, there is no evidence of vascular plants, amphibians/reptiles (including Wood and Snapping Turtles), bats and fish within the FMS Study Area. Despite the closest known bat hibernaculum being located approximately 35 km north east of the FMS Study Area (Moseley, 2007; EC, 2015), there is suitable bat foraging habitat but roosting sites are relatively rare due to lack of standing large coarse woody debris. Two priority fish species were observed (Brook Trout and Pearl Dace), despite there being limited quality spawning habitat for Brook Trout within the FMS Study Area.

2.3.5 Aquatic Biology

The FMS Study Area is located between Seloam Lake to the northeast and Fifteen Mile Stream to the west. Seloam Brook connects these two waterbodies, flowing through the FMS Gold Project from northeast to southwest (Atlantic Gold, 2020).

The aquatic ecosystem within the FMS Study Area is characterized by acidic conditions as is typical for the East River Sheet Harbour Watershed. Low pH levels, elevated temperatures and low dissolved oxygen concentrations limit fish habitat quality within select systems. Sediment and water quality are also impacted by the historic deposition of tailings. Aquatic productivity has been evaluated as low-moderate, which is also typical for the watershed and the region in which the watershed lies. Habitat complexity is generally lacking, with the majority of linear and open water features assessed as providing low quality habitat for Brook Trout and White Sucker. Only limited amounts of rearing and overwintering habitat, and even more



limited amounts of spawning habitat have been identified within the FMS Study Area for these species. Overall, fish habitat quality within the FMS Study Area has been evaluated as predominantly low.

Fish habitat within the FMS Study Area sits within the East River Sheet Harbour Hydro system, which has experienced fish passage limitations for decades, and therefore does not provide a migratory pathway for anadromous or catadromous species. The FMS Gold Project is located within the East River Sheet Harbour Watershed, which is inaccessible to anadromous fish due to a series of water storage and hydroelectric dams constructed since the 1920s (O'Neil, Harvie and Longard, DFO, 1997). Dams are present along Fifteen Mile Stream including upstream of the Project at Seloam Lake, and directly downstream of the FMS Gold Project at the Anti-Dam Flowage. Further downstream, there are several dams on the East River Sheet Harbour: Marshall Falls, Malay Falls, Ruth Falls and the Barrier Dam, all of which are unpassable to fish except for Barrier Dam under high water conditions. Furthermore, fish passage is also limited in certain systems by boulder fields and areas of subterranean flow. In addition, there has been substantially degradation from historic mine workings and deposition of tailings. Historical mining activity around Fifteen Mile Stream and Seloam Brook dates back to 1878 (Drage, 2015). Alterations to watercourse morphology, location, and flow, has resulted in changes to fish habitat, populations, and distribution.

Despite these historic changes, the FMS Study Area provides foraging, passage, overwintering, spawning and/or rearing habitat for the following fish species: Banded Killifish, Brown Bullhead, Lake Chub, White Sucker, Brook Trout, Pearl Dace, and cyprinid species. Overall, relative fish abundance throughout the FMS Study Area is low.

2.3.5.1 Anti-Dam Flowage

Anti-Dam Flowage is located in the eastern section of the Sheet Harbour Hydro System drainage area and is the lowest receiving waterbody for the Seloam Brook watershed. Originally built in 1924, the reservoir regulates flow to lower reaches of Fifteen Mile Stream through one dam. The surface area of Anti-Dam Flowage measures 160.6 km², with the maximum depth range between 2.5 and 8 metres. Dissolved oxygen concentrations range between 9.4 and 11.1 mg/L and are relatively homogenous throughout the water column. No thermal stratification within the reservoir was observed during recent monitoring. Overall, temperature and dissolved oxygen concentrations throughout the water column on Anti-Dam Flowage were acceptable for aquatic life. Anti-Dam reservoir generally exhibits oligo-mesotrophic conditions, with seasonal peaks in primary productivity levels occurring in the summer, and lower productivity levels through the fall and winter. Historically documented fish species in Anti-Dam Flowage include Brook Trout, Brown Bullhead, White Sucker, Lake Chub, Ninespine Stickleback (NSDFA, 2017).

2.3.5.2 Watercourse 43 (WC-43)

Watercourse 43 (WC-43) is a first order headwater stream that drains surface water east through Wetland 65 (WL65) and is the primary inlet to East Lake. The watercourse originates within the western shrub swamp portion of a wetland complex. Here, the watercourse disperses through the wetland and flows underground in sections, eventually forming a channel which flows east through a main culvert under the logging road. Ponding was observed on the upstream side of the culvert, which is likely due to a debris blockage. East of the logging road, WC-43 splits and disperses through treed swamp habitat still in a channelized fashion.



The banks of WC-43 are well defined and entrenched. Outside of the immediate riparian fringe, there is no evidence of bidirectional flow between WC43 and WL65. Eventually WC-43 drains into fen habitat where the channel was observed to have flooded into WL65, a large wetland complex surrounding East Lake.

The downstream end of WC-43 contains a 30 m section, which has seasonal subsurface flow during low and average flows events, but during high flow events, there appears to be surficial connectivity. Downstream of this section, the watercourse re-channelizes as it continues to East Lake, and although it supports fish passage, it provides low quality fish habitat due to low pH and dissolved oxygen levels.

During trapping efforts in spring 2020, a single Brook Trout was identified in East Brook, and a single Ninespine Stickleback was identified in WC43 Reach 2 (below the 30 m section). Otherwise, no fish were captured or otherwise observed upstream of this section. A single Golden Shiner was captured in East Lake, and it is expected that any fish present in this system would have access up to the 30 m section, at least. On-going assessments are being completed to support understanding of this system under various flow regimes.

2.3.5.3 East Lake

East Lake is a small, shallow lake with a surface area of 6.2 ha, and depth range between 1 and 5 metres. Organic peatlands surround approximately 50% of the northern half of the lake (WL65). Adjacent to open water, the wetland is dominated by low, ericaceous shrubs. Mature, softwood-dominated forest surrounds the southern half of the lake. The shoreline of the lake is completely undeveloped. A beaver dam is present on the outflow tributary of East Lake. Littoral zone is gently sloped, and unshaded by any forest canopy cover. Floating peatland extends slightly into the waterbody along the eastern edge of the lake. Emergent vegetation, primarily Leatherleaf and Sweet Gale, is restricted to areas of floating fen vegetation. Littoral zone near upland, forested habitat is abrupt and generally lacking vegetation. The majority of the substrate is large, angular boulders, with some areas dominated by sand and organic material. Low pH and dissolved oxygen measurements indicate that water quality is likely a limiting a factor to fish habitat quality. Fish collection surveys conducted in East Lake resulted in very low catch records (one Golden Shiner), one Brook Trout (East Brook outflow) and one Ninespine Stickleback (WC-43 outflow).

2.3.5.4 Watercourse 12 (WC-12)

Watercourse 12 (WC-12) is a first-order headwater stream that originates as drainage from WL-27, flowing west to Seloam Brook. The uppermost reach of the watercourse, including an approximately 210 m section that is proposed to be overlain by the tailings management facility berm and collector ditches, is extremely intermittent. It is only periodically channelized, and drains subsurface but may be contiguous with downstream, fish-bearing reaches during extreme precipitation events. Multiple boulder fields were observed between wetland habitat, including one reach between WL-18 and WL-20. Boulder-bed channels were mostly devoid of vegetation but were also predominantly lacking surface water. This boulder-bed channel section was identified as a potential barrier to fish passage. This section is classified as low-quality fish habitat that may provide potential forage and refuge habitat in the intermittent channelized sections of the watercourse, which is inaccessible to fish at most times of the year. A subterranean flow regime limits passage up into this area of WC-12 except during extreme flow events.



Fish collection was conducted upstream and downstream of the boulder channel which exists between WL18 and WL20. Fish collection above the potential barrier resulted in the capture of one Brook Trout and ten Ninespine Stickleback, confirming that the either the barrier is passable to fish during high flow events, or a resident population of fish exists above the barrier. Below the potential barrier sampling captured one Ninespine Stickleback and two Brook Trout.

2.4 Human Environment

The nearest regional center is Sheet Harbour, which is located 100 km east of Halifax on the Eastern Shore, and 33 km south of the FMS Gold Project. It is a local service center that provides basic needs to the local economy that is largely dependent on fishing, forestry and some extractive industries. The FMS Gold Project is located in an area with very few permanent and seasonal cottages. The nearest residence is approximately 10 km north of the Project, along Highway 374. The nearest federal Mi'kmaq communities are Beaver Lake Indian Reserve (IR), 24 km southwest of the Project and Sheet Harbour IR, which is 24 km to the south of the Project. Both communities form part of the Millbrook First Nation, which is approximately 65 km to the west of the Project.

2.4.1 Lands and Resource Use

The region is primarily dependent on resource industries, predominantly forestry, agriculture, and to a lesser extent, mining/quarrying. Mineral exploration activity in the region has been constant for decades but has grown and declined over the years depending on the economic conditions of the day. The mining industry represents a significant potential source of employment in this region that has historically seen considerable mining focus over the last 150 years. Forestry and tourism have fluctuated significantly in response to prevailing economic conditions. Due to the strong dependence on the resource sector, the economy is typified by "boom and bust" patterns. These key activities are anticipated to continue to form the basis of the regional economy (Atlantic Gold, 2019).

2.4.2 Indigenous Traditional Use

The Project lies within Eskikewa'kik or the "skin dressing territory", which spans from Halifax County across to Guysborough County. Beaver Lake Indian Reserve 17 is located along Highway 224, approximately 24 km as the crow flies (56 km via provincial highway) from the Project; and, is a satellite community associated with Millbrook First Nation (Figure 6). The reserve was established on March 2, 1867 and is approximately 49.4 ha in size. There are five homes and four small seasonal cottages or hunting camps located on the property with an estimated population on reserve of 21 persons. The surrounding lands are used for traditional hunting and gathering. Sheet Harbour Indian Reserve 36 is located just west of the community of Sheet Harbour, approximately 24 km from the Project and is also a satellite community associated with Millbrook First Nation. The reserve is 32.7 ha in size. There are 9 homes and an estimated population on reserve of 25 people. There are currently no land claims registered with the Government of Canada for any of the Mi'kmaq communities in Nova Scotia within the Project Area.

Engagement with Millbrook First Nation, as the closest Mi'kmaq community, has also commenced to support identification of current uses of the land in close proximity to planned Project infrastructure. To



date, no specific information relating to the current use of the land by the Mi'kmaq within and surrounding the Project Area has been revealed. There is no present indication of expected elevated current use within the Project Area based on distance to the nearest Mi'kmaq community and no observations of unique ecological features or species of elevated interest to the Mi'kmaq during baseline surveys to date. A Mi'kmaq Ecological Knowledge Study (MEKS) has been completed for the Project in accordance with the Mi'kmaq Ecological Knowledge Study Protocol (ANSMC, 2007). A Mi'kmaq Ecological Knowledge Study (MEKS) has been completed for the Project in accordance with the Mi'kmaq Ecological Knowledge Study Protocol (ANSMC, 2007). Atlantic understands the intrinsic value and sensitive nature of Indigenous traditional uses of the land. As a result, the Project has respectfully considered these values and made Project design changes, where possible, to minimize impacts to traditional use values.

2.4.3 Built Heritage and Archeology

In 2008, an archaeological screening and reconnaissance program was conducted in an area around the Egerton-McLean deposit to support proposed mine infrastructure. The reconnaissance noted six features, all believed to be associated with past mining operations, which were within close proximity to the Egerton-McLean deposit along the Seloam Lake road. It was recommended that the features and the high potential areas be subject to shovel testing and the industrial features subject to detailed documentation if any of them fell within areas of future development (Atlantic Gold, 2020).

The area was reinvestigated in 2017 to confirm the presence of the six features, and to implement a buffer zone for avoidance during exploratory drilling, including the remnants of the cellar of the New Egerton Gold Mining Company office, the wooden sill foundation of a 19th century school house and features of the New Egerton Gold Mining Company store. It was again recommended that any development around the identified features would require shovel testing and intensified historical research. In addition, any development planned outside of their original study area from 2008 should be subject to a larger search.

It should be noted that the archaeological study did not identify any Mi'kmaq resources. However, in the event that Mi'kmaq archaeological deposits are encountered during construction or operation of the Project, work will be halted in the vicinity of the discovery and immediate contact will be made with the Nova Scotia Museum and The Confederacy of Mainland Mi'kmaq.



3.0 PARTICIPATION AND CONSULTATION

Atlantic is committed to stakeholder and rightsholder consultation and engagement as part of the Project. Using key values of openness, transparency, collaboration and respect, Atlantic has continued to work with the local community, non-governmental organizations (NGOs), regulatory agencies, and interested members of the public for over a decade. Since 2019, Atlantic Gold has used the Community Relations Policy Statement, most recently updated in February 2020, issued by St. Barbara Ltd to guide community engagement efforts.

Both federal and provincial EA legislation requires consultation with the public to recognize concerns about adverse effects of the environment and identification of steps taken by Atlantic to address these concerns. Beyond the regulatory requirements, Atlantic strongly believes that meaningful engagement is crucial to the success of any development. Atlantic is committed to maintaining stakeholder consultation and engagement throughout the life of the Project.

3.1 Overall Approach

3.1.1 Public Engagement

A community engagement strategy has been developed by Atlantic for the Project and more generally for all its projects along the Eastern Shore area of Nova Scotia. The strategy sets out the formal engagement activities that Atlantic will undertake throughout all phases of its exploration activities and mining operations in Nova Scotia. This includes the construction, operation and closure of the Project, which includes the permitted Touquoy Mine Site and the proposed FMS Mine Site. Atlantic is also active in efforts to provide broader awareness relative to advanced exploration activities.

A successful community engagement strategy provides flexibility to allow adaptation to the needs of the community. In 2016, Atlantic developed its strategy for community engagement to coincide with the start of construction of the permitted Touquoy Gold Project and the development of the EA for the Project. This strategy raised awareness about the Touquoy Gold Project. In 2018, an engagement strategy was developed for Atlantic focused on the Fifteen Mile Stream Gold Project and the proposed Cochrane Hill Gold Project. This strategy is being continually updated and is paired with a broader communications plan for Atlantic to ensure messaging, communication and engagement initiatives are aligned and mutually supportive.

Community engagement also requires documenting and tracking all interactions, communications, and commitments. Atlantic uses stakeholder engagement software to plan, measure, and document engagements so that all stakeholder input and feedback is considered and integrated as appropriate.

3.1.2 Indigenous Engagement

Atlantic is committed to meaningful engagement of Indigenous Groups as part of the FMS Gold Project. Atlantic strongly believes that meaningful and long-term engagement of Indigenous Groups is crucial to the success of any development and is committed to maintaining engagement throughout the life of the Project, including beyond the EA process.

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While the government's duty to consult cannot be delegated to proponents, procedural aspects can be delegated. Both the federal and provincial governments have requirements for consultation under the Updated Guidelines for Federal Officials to Fulfill the Duty to Consult: 2011, and the Mi'kmaq-Nova Scotia-Canada Consultation Terms of Reference. Further, the Nova Scotia *Environmental Assessment Regulations* include a requirement to identify concerns of Indigenous People about potential adverse effects and steps taken, or proposed to be taken, by the Proponent to address concerns, as well as the steps taken to identify these concerns. The information gathered by the Proponent during its engagement with Indigenous Peoples helps to contribute to the Crown's understanding of any potential adverse impacts of the Project on potential or established Aboriginal or treaty rights, title and related interests, and the effectiveness of measures proposed to avoid or minimize those impacts.

For Indigenous Groups with the potential to be most affected by the FMS Gold Project, it was expected that Atlantic would strive toward developing a productive and constructive relationship based on on-going dialogue with the groups in order to support information gathering and effects assessment. As part of planning for the FMS Gold Project, engagement began as part of planning and environmental assessment of the Touquoy Gold Project over a decade ago. This engagement has focused on the Assembly of Nova Scotia Mi'kmaq Chiefs and staff of the Kwilmu'kw Maw-klusuaqn Negotiation Office (KMKNO), as well as Millbrook and Sipekne'katik First Nations.

3.2 Potentially Affected and Interested Stakeholders

A community engagement program with stakeholders commenced in February 2018 for the Project and consisted of discussions with the landowners on site access, local stakeholder groups and the surrounding community members.

In addition, regulatory consultation commenced in early 2017 for the Project, with an initial meeting to present the planned Project and to receive feedback on the regulatory regime and access regional expertise. Regular engagement through the Provincial "One Window Process: Mineral Development in Nova Scotia" has been ongoing since early 2018, in which regulator feedback was provided over the nature of scientific work being undertaken in relation to the environmental baseline studies during planning and design of the Project. Departments from federal and provincial governments that have been consulted on the Project, include:

- Impact Assessment Agency of Canada;
- Fisheries and Oceans Canada;
- Environment and Climate Change Canada;
- Canadian Wildlife Service;
- Health Canada;
- Transport Canada;
- Natural Resources Canada;
- Nova Scotia Environment;



- Nova Scotia Transportation and Infrastructure Renewal;
- Nova Scotia Lands and Forestry (formerly Nova Scotia Department of Natural Resources);
- Nova Scotia Energy and Mines (formerly Nova Scotia Department of Natural Resources); and
- Nova Scotia Office Aboriginal Affairs.

3.3 Potentially Affected and Interested Indigenous Groups

The Mi'kmaq are the original people of Nova Scotia and remain the predominant Indigenous Peoples within the Province. The courts have confirmed that the Mi'kmaq of Nova Scotia have both Aboriginal and Treaty rights protected under Section 35 of the *Constitution Act*. The nature and extent of those rights, as well as the responsibilities and authorities of governments with respect to those rights, are the subject of negotiation between the federal and provincial governments and the Mi'kmaq of Nova Scotia, as described above.

The Mi'kmaq of Nova Scotia maintains a claim of Aboriginal title to the lands and waters of Nova Scotia and adjacent areas of the offshore. The Mi'kmaq of Nova Scotia have a general interest in all lands and resources as the Mi'kmaq Nation maintain that they did not give up their land rights through treaty, voluntary cessation, or otherwise.

As part of engagement with the Mi'kmaq of Nova Scotia, the following Indigenous groups were listed in the FMS EIS Guidelines (CEAA, 2018) as being possibly affected by the Project. These include the thirteen Mi'kmaq First Nations in Nova Scotia, the Assembly of Nova Scotia Mi'kmaq Chiefs, and the Kwilmu'kw Maw-klusuaqn Negotiation Office (KMKNO):

- Acadia First Nation;
- Annapolis Valley First Nation;
- Bear River First Nation;
- Potlotek First Nation;
- Eskasoni First Nation;
- Glooscap First Nation;
- Membertou First Nation;
- Millbrook First Nation;
- Paq'tnkek First Nation;
- Pictou Landing First Nation;
- Sipekne'katik First Nation;
- Wagmatcook First Nation;
- We'koqma'q First Nation;



- Assembly of Nova Scotia Mi'kmaq Chiefs; and,
- KMKNO.

3.4 Existing Indigenous Consultation and Engagement Protocols

The Mi'kmaq of Nova Scotia, the Province of Nova Scotia and Canada adopted a Consultation Terms of Reference (TOR) which lays out a process for the parties to follow when governments wish to consult with the Mi'kmaq of Nova Scotia.

Nova Scotia has thirteen Mi'kmaq First Nations and the Assembly of Nova Scotia Mi'kmaq Chiefs represents eleven of the communities in consultation dealings with the Crown. KMKNO is the administrative group that represents the Assembly of Nova Scotia Mi'kmaq Chiefs in the consultation and negotiation processes with the Province of Nova Scotia and the Government of Canada.

The two Mi'kmaq communities in closest geographic proximity to the mine site are Millbrook and Sipekne'katik First Nations. The two communities conduct their own consultation through their elected Chief and Councils, rather than the KMKNO. Millbrook First Nation has two smaller communities near the Project: Beaver Lake Indian Reserve (IR#17) and Sheet Harbour (IR#36). These two communities are both approximately 24 km from the FMS Gold Project.

The Province of Nova Scotia provides advice to proponents on how they may engage with the Mi'kmaq of Nova Scotia through the Proponents Guide to Engagement with the Mi'kmaq of Nova Scotia.

3.5 Engagement Undertaken

3.5.1 Public Engagement Activities

While broader engagement on the FMS Gold Project has occurred for over a decade and will continue as per the public engagement strategy, specific community engagement activities have occurred to support the environmental assessment process for the Project since early 2018. Where possible, these processes will be used to support the development of this report. These may include, but not limited to, the following:

- Community Liaison Committee;
- Open Houses and Town Hall Meetings;
- Presentations and Meetings with Local Community Groups, Local Residents and Landowners; and,
- Community Bulletins (Newsletter).

The engagement to date associated with the preparation of the EIS for the FMS Gold Project has been documented, including a summary of issues raised related to the storage of mine waste and proponent responses. Further details can be found in Appendix K1 of the EIS.

3.5.2 Regulatory Engagement Activities

Regulator consultation activities have included one-on-one meetings, correspondence, meetings, workshops and site visits. On November 9, 2018, a site tour of the FMS Mine Site and Touquoy Mine Site



was held, and was attended by IAAC, DFO, the provincial Office of Aboriginal Affairs, representatives from Millbrook First Nation and KMKNO, along with Atlantic staff and their consultants. In addition, a one-day site visit to the FMS Gold Project, including the Touquoy Mine Site, was held for interested provincial and federal regulators on December 7, 2018. Further details are provided in Appendix K1 of the EIS.

3.5.3 Indigenous Engagement Activities

Atlantic has developed an engagement strategy that describes the general engagement activities to be undertaken with the Mi'kmaq of Nova Scotia throughout all phases of project development and operations in Nova Scotia.

General engagement tools may include, but are not limited to:

- Face-to-Face meetings, presentations and dialogue;
- Open houses and town hall meetings;
- Regular outreach through phone calls, emails and exchange of information; and,
- Community newsletters.

The objective of Mi'kmaq engagement is:

- To ensure all information is shared and discussed;
- To gather information and views from Indigenous groups on the potential adverse impacts on Aboriginal or treaty rights, and related interests; and,
- To discuss potential avoidance, mitigation and compensation for impacts, where required.

A summary of ongoing engagement with the Mi'kmaq of Nova Scotia is included in Appendix K2 of the EIS.

3.6 Planned Engagement

Atlantic has a broad objective to continue to engage Indigenous groups, stakeholders and the public throughout the lifecycle of its projects.

Indigenous engagement planning needs to be flexible in order to respond to the concerns and interest of the Mi'kmaq. Atlantic is strongly committed to building and maintaining strong relationships with the Mi'kmaq of Nova Scotia and will continue its engagement with the Mi'kmaq of Nova Scotia in the spirit of cooperation, mutual benefit and respect.



4.0 METHODOLOGY

The methodology utilized to assess mineral waste alternatives follows from and is intended to be compliant with that prepared by Environment Canada (2013).

4.1 Step 1: Identify Candidate Alternatives

The first stage of the assessment of alternatives is to determine possible mine waste disposal alternatives. This includes different options and storage locations for mine waste disposal.

4.2 Step 2: Pre-Screening Assessment

The pre-screening assessment allows those alternatives that do not meet minimum specifications to be removed from the assessment process. By not meeting these minimum requirements, the alternative is considered to contain a fatal flaw that is so unfavourable or severe that it eliminates the disposal method or site as a candidate mine waste disposal alternative. Pre-screening criteria are formulated such that a yes or no response is possible. There must be no reasonable mitigation strategy that would eliminate a fatal flaw.

The deliverable for the pre-screening assessment is a summary table which shows all candidate alternatives and whether they are carried forward to the characterization step, or eliminated based on the fatal flaw analysis.

4.3 **Step 3: Alternative Characterization**

The reduced number of alternatives remaining after the pre-screening assessment are then characterized to:

- Ensure that all aspects of the alternative are properly considered; and
- Allow direct comparison between alternatives, ensuring complete transparency of the alternatives assessment process.

As described in the Guidelines, there is no ideal number of alternatives that should be carried through, but there should be at least three or more alternatives remaining and determined to be worthy of detailed assessment. At least one of these alternatives should not impact a natural waterbody that is frequented by fish, unless it can be demonstrated that this possibility does not reasonably exist based on site-specific circumstances.

Alternatives are characterized based on environmental, technical, project economic and socio-economic categories (accounts). Characterization criteria are selected by a multidisciplinary team representative of the above accounts.

Deliverables for the alternatives characterization include a description of each alternative, and a table of environmental, technical, project economics and socio-economic criteria.

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4.4 Step 4: Multiple Accounts Ledger

Preliminary screening of alternatives can be used to eliminate alternatives with any fatal flaws, which can occur with minimal judgement. However, evaluation criteria used in the MAA considers the material impact, such as a benefit or loss, associated with each alternative.

A multiple accounts ledger includes a three-level hierarchy comprised of accounts, sub-accounts and indicators. Accounts identify the general area of consideration and include:

- Environmental;
- Technical;
- Project economic; and
- Socio-economic.

Each account is split into evaluation criteria (sub-accounts) that are used to determine the level of impact to the account. For example, an environmental account could contain sub-accounts that include terrestrial ecosystem impacts, aquatic ecosystem impacts, impacts to groundwater and impacts to air quality. Subaccounts should conform to the following criteria detailed by Environment Canada (2013):

- Sub-accounts need to be impact driven;
- The sub-account must differentiate one alternative from another;
- The sub-account must be relevant to the account;
- The sub-account must be understandable, and unambiguously defined for clarity;
- Sub-accounts must not be redundant; and
- Sub-accounts should be judgmentally independent².

While sub-accounts measure impacts between the alternatives, they are often not easy to quantify and rank in a transparent manner. Measurement criteria (indicators) allow qualitative or quantitative measurement of the impact associated with each sub-account.

For the purposes of this MAA, each indicator has a six-point scale established that details how an alternative is valued, as suggested in the Guidelines (Environment Canada 2013). Based on consultant experience with other assessments of alternatives, for indicators measured by quantitative data, the six-point scale is set up to reflect and maximize the relative differences between each alternative. Typically, this results in one alternative with the best indicator value of six, one alternative with the lowest indicator value of one, while the remaining alternative is somewhere in the middle of the scale depending on its relative characteristics.

Qualitative scales are set up to cover a wider range of scenarios for added clarity and to ensure that an independent reviewer would also assign the same values. Typically, this results in the alternatives tending to have values towards the middle of the scale.

² One sub-account cannot depend on the value of another sub-account.



Deliverables for the multiple accounts ledger include a comprehensive list of accounts, sub-accounts and indicators, including rational for selection, and six-point value scales for each of the indicators.

4.5 Step 5: Value-Based Decision Process

4.5.1 Valuating

Each alternative is assigned a value for each indicator ranging from one to six. A six is assigned when the alternative meets the best criteria on the indicator value scale, and likewise a one is assigned when the alternative meets the worst criteria.

The deliverable for valuation is a summary table of values determined for each indicator.

4.5.2 Weighting

An experienced multidisciplinary team, with representatives from Atlantic and Wood, held a workshop to determine appropriate weightings for the subaccounts and indicators. Where possible, views of Indigenous communities and stakeholders as identified during consultation were considered when determining weights.

Weights were applied to each sub-account and indicator on a scale of one to six based on the relative importance of each sub-account and indicator. A weight of two is considered twice as important as a weight of one, likewise, a weight of four is twice as important as a weight of two. By design of the scale, no sub-account or indicator can be weighted more than six times more important than another sub-account or indicator. Where sub-accounts and indicators had less influence in differentiating two or more alternatives, the weightings were reduced, where appropriate, so as not to overemphasize these particular sub-accounts and indicators

4.5.2.1 Indicators and Sub-Accounts

The weights of indicators are comparable within each individual sub-account and cannot influence separate sub-accounts. In the event of only one indicator in a given sub-account, a weight of one was applied. Sub-account weights are only applicable within a given account and are not comparable across accounts.

The deliverable for weighting is a summary table of all weights assigned to the sub-accounts and indicators, including rationale for the selection of each weight.

4.5.2.2 Accounts

The base case account weights as suggested by ECCC (Environment Canada 2013; Section 2.6.2 therein) are as follows:



- Environment, 6;
- Technical, 3;
- Socio-economic, 3; and
- Project economics, 1.5.

As provided in the Guidelines, the base case includes weighting the environment account twice as important as the technical and socio-economic accounts, which in turn are weighted twice as important as the project economics account.

4.5.3 Quantitative Analysis

The MAA follows the methodology provided in Environment Canada (2013) as described below.

For each indicator, the indicator value (S) of each alternative is listed in one column. The weighting factor (W) is listed in another column and the combined indicator merit score (S \times W) is calculated as the product of these values.

Indicator merit scores can be directly compared across alternatives, and likewise sub-account merit scores (Σ {S × W}) can be directly compared across alternatives. However, to allow comparison of these values against values for other sub-accounts, the scores must be normalized to the same six-point scale used to score each indicator value. This is achieved by dividing the sub-account merit score by the sum of the weightings (Σ W) to yield a sub-account merit rating (Rs = (Σ {S×W}/ Σ W). This will again be a value between 1 and 6. This normalization is necessary to balance out different numbers of indicators and sub-accounts for each account. Without this normalization, the number of indicators associated with each sub-account, and the number of sub-accounts associated with each account, would have to be identical, otherwise the analysis will be skewed by accounts with more sub-accounts or indicators.

The same procedure of weighting and normalization is followed to determine account merit scores (Σ {Rs×W}), and account merit ratings (Ra = Σ (Rs×W)/ Σ W). This process is repeated one final time, and an alternative merit score (Σ {Ra×W}), and an alternative merit rating (A = Σ (Ra×W)/ Σ W), is determined for each of the alternatives

The deliverables for the quantitative analysis are summary tables showing calculations for the sub-account merit ratings, account merit ratings and alternative merit ratings.

4.6 Step 6: Sensitivity Analysis

In addition to the base case, additional scenarios are considered in order to evaluate the robustness of the analytical process and to determine the degree to which various options are influenced by the choice of weightings.



5.0 CANDIDATE ALTERNATIVES

Seven tailings management technologies and seven possible TMF locations were identified through the candidate alternative development process. The following provides a description of each storage method, a rationale behind the seven possible TMF locations, and a description of the seven candidates based on the tailings storage method and location to assess in the pre-screening assessment.

5.1 Tailings Technologies

5.1.1 Conventional Slurry Tailings

Conventional slurry tailings disposal is a common technology for surface tailings management. Tailings are pumped at a solids content of < 50% by weight to the TMF via pipeline and discharged subaerially. Tailings flow downgradient from the discharge points into the TMF to form a beach, with coarser material settling closer to the embankments, and finer grained material settling further into the impoundment. Water present in the tailings slurry, in addition to surface runoff from upstream catchment areas and direct precipitation on the TMF, form a tailings supernatant pond which can be used for water recycle and effluent aging. Developing a flatter angle tailings beach promotes overall tailings surface stability and makes it easier to revegetate exposed tailings beaches.

5.1.2 Thickened Tailings

Thickened (partially dewatered) tailings production involves using a variety of dewatering systems to produce partially dewatered tailings, which can be pumped to a storage area by pipeline at a higher solids content than conventional slurry tailings (typically in the range of 50 to 65% solids by weight). The consistency of the thickened tailings requires conventional impoundment dams for containment. Thickened tailings deposition is typically used where there is an advantage reclaiming more water in the mill, or where maintaining a smaller supernatant pond is desirable. In such an instance, more tailings can be stored with less dam volume, as opposed to developing a flatter deposited tailings profile, ultimately allowing for a reduced area the TMF overprints.

5.1.3 Paste Tailings

Ultra-thickened (paste) tailings are generally defined as being comprised of 65 to 75% solids by weight. Paste tailings are produced in specialized paste thickeners, or ultra-high-density thickeners, and have been dewatered to a point where they theoretically do not segregate when deposited and produce minimal bleed water. Despite this, paste tailings are not self-supporting and an impoundment for the paste tailings, as well as an impoundment for process water, would be required. A major challenge with paste tailings is flow velocity in the pipe, and as a result, positive displacement pumps are typically required over centrifugal pumps for transporting of paste tailings. The use of paste tailings for surface storage is not common. Paste tailing, sometimes combined with cement, is best-suited for backfill in underground workings, where transport and placement is aided by gravity.



Paste tailings are more appropriate for sites that operate in a significant water deficit and require a high level of water conservation, i.e. where water supply is significantly limited or prohibitively expensive.

5.1.4 Filtered Tailings

Filtered tailings production involves using a variety of dewatering and filtration systems to produce a relatively dry (unsaturated) tailings (typically > 70% solids content), which can be trucked or conveyed to a surface facility where they are spread and compacted in place to create a filtered tailings stack. This method of tailings management is primarily utilized in drier climates where water conservation is a critical issue, areas of high seismic activity not suitable for dams, as well as at some northern settings where the stacked tailings remain in an inert frozen state within permafrost. Confining berms or buttresses are typically required to support the filtered tailings stack, particularly in areas where maintaining the stack in an unsaturated condition is challenging (i.e. in areas with high annual precipitation or snowfall).

Use of filtered tailings will require a separate water management pond (or several) to store process water, contact water and storm water runoff from the filtered tailings stack, as water cannot be stored on the surface of the filtered tailings. The water management pond(s) must be large enough to manage storm water runoff and to provide a buffering volume for fluctuations in process water requirements and periods of low rainfall and/or runoff, such as during winter operations.

5.1.5 Cycloned Tailings

Cycloning tailings is a variant on a conventional slurry TMF where a conventional tailings slurry is pumped to the TMF and cyclones are used to mechanically separate coarse tailings (underflow) from fine tailings and effluent (overflow). The coarse tailings can be used as a dam construction material and lowers the total volume of tailings stored between dams.

The fine tailings (overflow) is stored as conventional slurry tailings behind the coarser material. Implementation of drainage zones are a key consideration for use of cyclone tailings as dam construction material, to avoid over-saturation or build-up of pore-pressure within the coarse fraction in the dam shell.

Cycloned tailings are typically used on projects where sufficient waste rock or borrow material is not available for dam construction or is a long distance from the TMF to render haulage costs prohibitively expensive.

5.1.6 Co-Disposal of Mine Waste

Co-disposal is the mixing of fine-grained mine waste material (i.e., tailings) with coarse-grained mine waste material (i.e., mine rock) into a single waste storage facility. Mixing of the tailings with mine rock promotes filling of voids to maximize density of the material. Several different terminologies for co-disposal are considered based on the point at where mixing occurs, or how the independent waste streams are placed including co-mingling (mine rock and tailings mixed at TMF), co-placement (mine rock and tailings placed separately in TMF) or co-deposition (mine rock and tailings layered).



5.2 Tailings Storage Locations

Ten potential tailings storage locations were initially identified, however three of the locations were considered repetitive and removed from consideration.

Further, open pits could be used for the deposition of tailings. Open pits, when completed, form a basin which can potentially be used to impound tailings without the use of dams. In this circumstance, a lobe of the open pit would be used for the deposition of mine waste when completed if appropriate topographic control is present, the open pit workings are effectively isolated from the deposition area, and the waste is stored in a manner that does not allow movement to active mining areas in the open pit. The FMS Gold Project propose a single open pit, with no lobes that could provide basins for the impoundment of tailings and supernatant during operations. Due to pit geometry, the majority of the storage capacity available in the open pit is unavailable until the end of the mine life, unless an engineeed structure is constructed within the operating pit. This would be further compounded by the need to have sufficient supernatant storage above the tailings to account for high precipitation events / periods. Even if the open pit could be utilized for tailings storage, only a small portion of the overall tailings stream could be directed to the open pit, necessitating a surface impoundment. The use of the open pit for storage of tailings has been screened out.

As a result, a total of seven TMF candidate locations (Figure 7) were selected based on engineering studies and the following criteria:

- The alternative location should be within an acceptable distance from the open pit;
- The alternative location should avoid encroaching upon or overprinting a major watershed divide, and encroaching into more than one watershed;
- The alternative location should avoid encroaching upon or overprinting a major waterbody (i.e. Seloam Lake or Anti-Dam Flowage);
- The alternative location should avoid encroaching upon or overprinting or substantially interfering with major provincial infrastructure; and,
- The alternative location should avoid encroaching upon or overprinting protected areas.



6.0 PRE-SCREENING ASSESSMENT

Prior to completing a comprehensive MAA, a pre-screening assessment is applied to determine whether any candidate alternatives have an inherent fatal flaw. If a candidate alternative is determined to have a fatal flaw it is not carried forward to the MAA.

6.1 **Pre-Screening Criteria for Tailings Technologies**

Pre-screening criteria developed for the FMS Gold Project assessment of alternative tailings technologies were:

• Does the alternative method confer a substantial benefit over conventional technologies? (yes / no)

The management technology must offer significant advantages, without significant offsetting drawbacks, over the use of conventional slurry tailings for the conditions of the Project.

• Does the alternative allow for disposal of a sufficient quantity of tailings? (yes / no)

Alternatives that can only manage a portion of the tailings generated are insufficient and will require other alternatives to be employed to meet Project needs. The total amount of tailings to be generated from the FMS Gold Project is 13.4 Mt.

The results of the pre-screening assessment for the candidate storage methods are provided in Table 1. A summary of the advantages and disadvantages for each candidate storage method is provided in Table 3.

6.2 **Pre-Screening of Candidate Tailings Technologies**

6.2.1 Conventional Slurry Tailings

The use of conventional slurry for deposition of tailings is standard practice at gold mines. Where required, tailings and effluent from the processing plant can be pre-treated using the SO_2 / air process to destroy cyanide and to precipitate heavy metals to concentration levels that are manageable through further effluent aging in a tailings pond. Alternatively, supernatant liquid or effluent can be treated at the TMF.

The tailings slurry produced at the processing plant can be pumped via pipeline to a surface impoundment which uses natural topography and constructed dams to contain the tailings slurry. A tailings pond forms on top of the tailings which is recycled back to the process plant. No fatal flaws are apparent for the use of conventional tailings slurry in a new TMF and this candidate tailings storage method has been carried forward to the MAA.

6.2.2 Thickened Tailings

The use of thickened tailings at a mine can offer some advantages over conventional slurry discharge as settled dry densities can be slightly higher with less water lost to tailings void space, and tailings may be deposited with a steeper beach, depending on the proportion of finer grained materials in the tailings stream. The topography around the Project does not require the use of thickened tailings for steeper tailings



beaches and thickening of the tailings will not substantially reduce dam requirements. As thickened tailings storage methods do not lend any significant advantages over a conventional slurry and have additional power requirements / economic considerations, further review of thickened tailings is not warranted and this alternative has been screened from consideration in the MAA.

6.2.3 Paste Tailings

From an environmental and socio-economic perspective, the use of tailings as paste backfill to augment underground stability is ideal as it has fewer adverse human or environmental effect. The use of tailings in paste backfill can help improve the long-term stability of underground workings, but is much more costly, for purely disposal purposes, compared with use of a surface impoundment with good natural containment. As the FMS Gold Project is an open pit operation, this tailings storage method was eliminated from further consideration.

6.2.4 Filtered Tailings

Filtered tailings are best suited for arid sites which have a very limited supply of water and require maximum water recycle, areas of high seismic potential that are not suited to large dams, or arctic sites where a dry stack can be encapsulated by permafrost to minimize acid rock drainage (ARD) / metal leaching (ML). Although these conditions are not applicable to the FMS Gold Project, and the use of filtered tailings technology is unconventional in Nova Scotia, filtered tailings have an advantage over conventional slurry tailings as the tailings are dewatered at the plant site and no large tailings pond, positioned over tailings is required. This eliminates the potential for a dam breach releasing tailings and effluent with a high potential energy into the environment. No fatal flaws are apparent for the use of filtered stack tailings and this candidate tailings storage method has been carried forward to the MAA.

6.2.5 Cycloned Tailings

The primary advantages of employing cycloning technology are economic in nature as Atlantic would not require rockfill for its dam raises. The use of cycloning technology could increase the dam footprint (as the downstream slopes may be as flat as 5H:1V) and the impoundment at location #4 would still overprint water. In addition, the technology does not eliminate the need for a tailings pond located over tailings. Additional environmental concerns include increased dust generation potential, increased ARD / ML runoff potential from the exposed coarse tailings, and increased water management concerns. Technical constraints include underdrainage and managing winter deposition as ice buildup could lead to sinkhole development after the spring thaw. Socio-economic constraints include public perception of using tailings material for dam construction and increased fugitive dust. As cycloned tailings do not allow alternatives to avoid overprinting of water and do not eliminate the need for tailings ponds located over tailings, the use of cyclone tailings does not provide a substantial benefit over conventional slurry technology and this alternative has been eliminated from further consideration in the MAA.



6.2.6 **Co-Disposal of Mine Waste**

When tailings are co-mingled, the tailings may be dewatered to the point of a paste or filtered tailings or use conventional slurry tailings, prior to mixing with the mine rock. Co-mingling of tailings with mine rock not only has many of the same operational complexities as paste or filtered tailings, but additional complexity is introduced via the mixing process. Co-mingling of the two waste streams may result in the need for a larger facility, or multiple facilities, to contain the increased waste volume. Further, the increased equipment requirements (thickening, pumping and/or conveying, mixers, etc.) adds considerable capital and operating costs, which adversely impact the economic viability of the project. Co-mingling is not considered feasible for mine waste generated by the FMS Gold Project and is eliminated from further consideration.

6.3 **Pre-Screening Criteria for Storage Locations**

Pre-screening criteria developed for the FMS Gold Project assessment of alternative storage locations were:

• Does the alternative location stay within the main primary watershed (and avoid overprinting a primary watershed divide)? (yes / no)

Alternatives that are located within a single primary watershed (i.e. East River Sheet Harbour Watershed) will minimize the risk for a greater distribution of potentially affected runoff from the TMF and reduce water management requirements.

• Is the alternative location within Atlantic property boundary, or on lands which could be readily acquire? (yes / no)

Alternatives that are located off the property boundary will require Atlantic to acquire additional surface and mineral rights. This is expected to be difficult to achieve and will result in unacceptable Project delays.

The results of the pre-screening assessment for the candidate storage locations are provided in Table 2. A summary of the advantages and disadvantages for each candidate storage location is provided in Table 3.

6.4 Pre-Screening of Candidate Storage Locations

Seven TMF locations were identified at the preliminary stage (Figure 7).

The major watershed divide between East River Sheet Harbour Watershed and the Liscomb watershed is located approximately 3 km to the east of the open pit. Locations that straddle this divide increase the logistical difficulty of controlling seepage and discharge from the TMF. Therefore, TMF location #6 has been eliminated from the analysis.

Candidates located outside the property boundaries could be difficult or impossible to acquire while meeting Project timelines and should be excluded from further consideration. Location 1 and 3 are partly located on lands held by others, and have been eliminated as a candidate, as it would not be possible to obtain rights to build a tailings management facility.

Locations #2, #4, #5 and #7 were carried forward into the MAA. Candidate locations #1, #3 and #6 had fatal flaws and did not meet the pre-screening criteria to carry forward.

6.5 Alternatives for the Multiple Accounts Analysis

Based on the two tailings technologies, and four tailings storage locations that have been advanced through the pre-screening assessment (Sections 6.2 and 6.4), a total of eight possible alternatives exist. In the interest of having a focused and manageable MAA, consistent with the Guidelines (Environment Canada 2011), rather than assessing every possible combination, alternatives which make the most sense from a mine development perspective have been developed for consideration in the MAA. All candidates not eliminated in the pre-screening step are considered through the alternatives carried forward to the MAA. As a result, conventional slurry tailings were only considered for Location #2 and #7. The use of filtered tailings at Location #2 and #7 was not considered feasible due to incompatible site conditions and the haul distance required for delivery of the filtered tailings to these locations. An adjusted configuration for Location #4 was also considered which avoids fish-frequented waters (Alternative G).

Alternatives A, B, C, D, E, F and G were carried forward into the MAA. The other combinations of methodologies and locations had fatal flaws and did not meet the pre-screening criteria to carry forward.

	Location #2	Location #4	Location #5	Location #7
Alternative A	Slurry			
Alternative B		Slurry		
Alternative C		Filtered		
Alternative D			Slurry	
Alternative E			Filtered	
Alternative F				Slurry
Alternative G		Slurry		

6.5.1 Alternative A

Alternative A utilizes conventional slurry tailings, deposited at Location #2. Process water and contact water runoff would be managed within the TMF supernatant pond. This alternative would require MDMER Schedule 2 regulatory amendment.

6.5.2 Alternative B

Alternative B is the tailings approach presented in the EIS. It utilizes conventional slurry tailings, deposited at Location #4. Process water and contact water runoff would be managed within the TMF supernatant pond. This alternative would require MDMER Schedule 2 regulatory amendment.

6.5.3 Alternative C

Filtered stack tailings was one of the deposition methods carried forward from the pre-screening assessment. Alternative C utilizes filtered stack tailings deposition at Location #4. Process water and contact



water runoff would be managed in two separate mine water management ponds, located downstream of the filtered tailings stack. Alternative C will require a MDMER Schedule 2 regulatory amendment for the TMF, but not for the mine water management ponds.

6.5.4 Alternative D

Alternative D utilizes conventional slurry tailings, deposited at Location #2. Process water and contact water runoff would be managed within the TMF supernatant pond. This alternative would require MDMER Schedule 2 regulatory amendment.

6.5.5 Alternative E

Alternative E utilizes filtered stack tailings deposition at Location #5. Process water and contact water runoff would be managed in two separate water management ponds, located downstream of the filtered tailings stack. Alternative C will also require a MDMER Schedule 2 regulatory amendment for the TMF, but not for the mine water management ponds.

6.5.6 Alternative F

Alternative F utilizes conventional slurry tailings, deposited at Location #2. Mine water would be managed within the TMF supernatant pond. This alternative would require MDMER Schedule 2 regulatory amendment.

6.5.7 Alternative G

Alternative G is a variant of Alternative B and was selected as the best alternative that avoids placing mine waste over waters frequented by fish, and accordingly has no MDMER Schedule 2 requirements. It utilizes conventional slurry tailings, deposited at Location #4.



7.0 ALTERNATIVES CHARACTERIZATION

Alternatives A, B, C, D, E, F and G met the pre-screening criteria and were carried forward into the MAA. This section provides a characterization of each of the remaining alternatives from the environmental, technical, project economics and socio-economic perspectives. A summary of the characterization for each alternative can be found in Table 4.

7.1 Alternative A: Location #2, Conventional Slurry Tailings

7.1.1 Overview

Alternative A utilizes conventional slurry tailings technology with the TMF to the northwest of the open pit (Location #2). It has the smallest site footprint with the TMF located the next furthest away from the centroid of the open pit of all the alternatives. The focus in designing Alternative A was to have an alternative that has a small footprint (Figure 8).

7.1.2 Environmental Characterization

Alternative A has 1.6 Mm³ in water storage volume, within four water managements ponds including the TMF supernatant pond and three seepage management ponds. The closest receiving waterbody is Bear Brook, which is moderately sized. Alternative A will be completely located within one subwatershed, and the design will reduce flows (>25%) in 220.8 m of the associated watercourse of the impacted subwatershed, which is the smallest of all alternatives. There are no watercourse realignments associated with Alternative A, however it will impact the largest waterbody fish habitat (2.1 ha) and the second largest watercourse fish habitat (1,445 m)³. It is anticipated that there will be three watercourse crossings required to construct and operate Alternative A.

Alternative A has the smallest footprint at 90.2 ha, and will use the smallest amount of previously disturbed habitat (1.2 ha). Alternative A will impact the second smallest amount of wetland (6.3 ha) and it is anticipated that 8.4 ha of mainland moose habitat will be impacted. It is assumed that all watercourse habitat will support Brook Trout in some capacity and therefore 1,445 m will be impacted, which is the second largest.

Fugitive dust could be generated from Alternative A which has the smallest slurry tailings area (90 ha) during drier conditions and from the 4.6 km long access road during construction. The ability to minimize GHG emissions generated from the construction of the tailings starter dam are predicted to be very good, as clearing is within a relatively small area (98 ha), with a relatively small volume (2.16 Mm³) of dam construction materials to be hauled over a moderate distance (<5 km). The distance from the centroid of Alternative A to the closest receptor is approximately 9.45 km, which is largest distance and would therefore have the smallest impact in terms of noise emissions.

³ It should be noted that the calculation of overprinted fish habitat (waterbody and watercourse) for the purposes of the Alternatives Assessment was based on provincially available data for all four locations in order to allow comparison amongst the alternatives. The determination of fish habitat for the purposes of the environmental assessment (as shown in Figure 3) was based on site-specific information delineated for the effects assessment.



The closest protected area is the Abraham Lake Wilderness Area, which is approximately 4.5 km from the centroid of Alternative A.

In the event of a TMF dam failure, the magnitude of a failure would be dependent on the height and length of the dam. Alternative A has the second smallest dam height (29 m) with the second shortest dam length of 3.1 km. The most sensitive area downstream is Fifteen Mile Stream, which is located 0.2 km from Alternative A, and there is public infrastructure (road crossing for local road access) located 3 km further downstream.

7.1.3 Technical Characterization

The design of Alternative A has a storage efficiency (ratio of tailings storage volume to dam fill volume) of 6.4, which is the second highest. The dam volume of the final embankment for Alternative A is the second smallest (2.16 Mm³). Tailings dams are required along a large portion of the perimeter, with a large primary dam and a connecting saddle dam. Alternative A provides generally good natural containment with some undulating topography within.

With respect to safety, there are four bends in Alternative A, which is the third smallest. It has a dam length of 3.1 km and dam height of 29 m, which are the second smallest measurements in both cases. It is based on a conventional slurry tailings design with four water management ponds and 3.45 km of seepage ditching.

For management of contact water runoff, Alternative A requires 820 m of ditching to divert non-contact water around the TMF, and a surplus water system consisting of two pumps and a 6.75 km long pipeline will transfer excess water to the water treatment plant, for treatment and release. It is anticipated that 158 ha of the associated watershed will be impacted, which is the fourth smallest of all alternatives. Approximately 3.45 km of seepage ditching will be required around the perimeter of the TMF, which is the second smallest. Alternative A will also require a 7.2 km long pipeline to return reclaim water from the TMF to the mill.

The starter embankment for Alternative A requires approximately 0.25 Mm³ of dam fill materials to construct, which is the smallest. The final embankment for Alternative A would require an additional 1.91 Mm³ of dam fill materials to construct, which is the second smallest, and the most additional seepage ditching (1.9 km) of all alternatives.

With respect to the ability to obtain the initial environmental permits, Alternative A has with minimal baseline geotechnical knowledge and minimal engineering studies completed for the conventional slurry tailings design. Consultation for Alternative A has been limited, and as a result, the anticipated permitting schedule would be considered moderate.

The straight-line distance between the processing facility and the TMF is 4.6 km. The elevation difference between the TMF and the mill for Alternative A is the smallest with the crest elevation of the final TMF embankment being 143 masl. As Alternative A uses a conventional slurry tailings design, the complexity of the processing is low, although it will require a tailings pipeline distance of 8.5 km, which will require a stronger pumping system. Given the pipeline length, there is an increased risk of freezing if not drained/



not in continuous use. Overall, the complexity of depositing tailings for this alternative is based on conventional slurry tailings deposition methodology and is therefore considered low complexity.

Alternative A will be constructed for conventional slurry tailings management, however but there is currently insuffient geotechnical data in the area of the dam to assess foundation conditions. It is anticipated that the distance to haul suitable dam construction materials would be less than 5 km.

7.1.4 **Project Economics Characterization**

Alternative A is projected to have the lowest overall costs out of the seven alternatives.

The capital cost of building Alternative A is the lowest, due to the small footprint requiring less area to clear and grub. The dam volume requires the smallest amount of material during the construction of the starter dam. The sustaining capital costs of Alternative A is the third lowest (higher than Alternative E and F), as the amount of dam material will increase during subsequent raises. The operating costs for Alternative A are the highest of the conventional slurry tailings options due to the distance and elevation difference required to pump the tailings and the reclaim water for processing. The closure and post-closure costs for Alternative A are the third lowest due to the size of the tailings area to be reclaimed, although there are substantial costs associated with the reclamation of the pumps and pipelines for this alternative.

Due to the lack of baseline geotechnical and environmental data for this location, there is required to complete additional detailed engineering studies and therefore there is risk that the ability to obtain the initial permit for this alternative may take an additional year. This could result in a decrease in the Project net present value by \$7.6 million.

7.1.5 Socio-Economic Characterization

Loss of recreational fishing opportunities are the largest with Alternative A due to the loss of waterbody and watercourse habitat. The loss of commercial forest harvesting and ATV trails is the lowest with Alternative A. Where there will be an impact to private land ownership, this alternative will have the second largest impact.

The potential for fugitive dust is lower with the conventional slurry tailings design, compared to the filtered tailings, particularly with the smallest footprint (90 ha) for Alternative A, although it is located 4.6 km from the processing facility, which could generate dust from construction traffic. The potential for a hazard to the public is higher with Alternative A due to the proximity of the tailings facility to Fifteen Mile Stream (0.2 km) and the fact there is a public road crossing approximately 3 km downstream. The risk to workers from a potential failure with Alternative A is considered to be lower than the other alternatives due to the second lowest dam height of 29 m and the second farthest distance (8.5 km) from the mine workings, if it reached there at all.

Operational impacts from Alternative A are anticipated to be low. The visual impacts from the second lowest dam elevation will be low and the location of the TMF is the furthest from the closest sensitive receptor, which is 9.45 km further south.



Due to the fact this alternative has a low capital and operating cost, it is anticipated to be resilient to fluctuations in the market price of gold and it unlikely that there would be a need to place the operation in temporary care and maintenance. As a result, the impact to local jobs and business opportunities is unlikely to be impacted.

7.2 Alternative B: Location #4, Conventional Slurry Tailings

7.2.1 Overview

Alternative B utilizes conventional slurry tailings technology with the TMF located to the east of the open pit (Location #4). It has the second largest TMF footprint of all the alternatives and is in close proximity to the centroid of the open pit (Figure 9).

7.2.2 Environmental Characterization

Alternative B has 1.6 Mm³ in water storage volume, within three water managements ponds including the TMF supernatant pond and two seepage management ponds. The closest receiving waterbody is Anti-Dam Flowage, which has a large assimilative capacity. Alternative B will be located over the watershed divide of two subwatersheds, and the design will reduce flows (>25%) in 5,136 m of the associated watercourses, which is the highest of all alternatives. There are no watercourse realignments associated with Alternative B, however it will not impact waterbody fish habitat but will impact the fourth largest amount of watercourse fish habitat (683 m). It is anticipated that there will be no watercourse crossings required to construct and operate Alternative B.

Alternative B has the second largest footprint at 142.8 ha, and will use the third largest amount of previously disturbed habitat (4.0 ha). Alternative B will impact the largest amount of wetland (12.1 ha) and it is anticipated to impact the largest amount of mainland moose habitat (12.1 ha). It is assumed that all watercourse habitat will support Brook Trout in some capacity and therefore 683 m will be impacted, which is the fourth largest of the alternatives.

Fugitive dust could be generated from Alternative B which has the second largest slurry tailings area (142.8 ha) during drier conditions although there would only be 0.8 km (third shortest) of access to generate dust during construction. The ability to minimize GHG emissions generated from the construction of the tailings starter dam are predicted to be very good, as clearing is within a moderately sized area (90 ha), with a small volume (1.22 Mm³) of dam construction materials to be hauled over a short distance (<1.5 km). The distance from the centroid of Alternative B to the closest receptor is approximately 5.7 km, which is fifth largest distance and would therefore have the greater impact in terms of noise emissions.

The closest protected area is the Toadfish Lakes Wilderness Area, which is approximately 1.55 km from the centroid of Alternative B, the second smallest distance.

In the event of a TMF dam failure, the magnitude of a failure would be dependent on the height and length of the dam. Alternative B has the third smallest dam height (32 m) with the second shortest dam length of 3.1 km. The most sensitive area downstream is Fifteen Mile Stream, which is located 3.6 km from Alternative B, but there is public infrastructure (road crossing for a local road access) located 0.85 km downstream.



7.2.3 Technical Characterization

The design of Alternative B has a storage efficiency of 4, which is the third highest. The dam volume of the final embankment for Alternative B is the third smallest (3.93 Mm³). Tailings dams are required along a large portion of the perimeter, with a large primary dam. Alternative B is located in topography that provides some advantages on the south edge.

With respect to safety, there are three bends in TMF dam for Alternative B, which is the second smallest. It has a dam length of 3.1 km and dam height of 32 m which are the third smallest. The TMF dam design is based on a rockfill structure for conventional slurry tailings with three water management ponds (two seepage ponds and one supernatant pond) and 2.74 km of seepage ditching.

For management of contact water runoff, Alternative B will not require any non-contact water ditching, and will require a surplus water management system consisting of a single pump and a 920 m long pipeline to transfer excess water to the water treatment plant. It is anticipated that 187 ha of the associated watershed will be impacted, which is the third largest of all alternatives. Approximately 2.74 km of seepage ditching will be required around the perimeter of the TMF, which is the fourth most. Alternative B will also require a 2.2 km long pipeline to return reclaim water from the TMF to the mill.

The starter embankment for Alternative B requires approximately 1.22 Mm³ of dam fill material, which is the third largest. The final embankment for Alternative B would require an additional 2.71 Mm³ of dam construction materials which is the fifth largest. In addition, it would require the third largest additional seepage ditching (1.2 km) of all alternatives.

With respect to the ability to obtain the initial environmental permits, Alternative B has with the most baseline geotechnical knowledge and preliminary engineering studies completed for the conventional slurry tailings design. Consultation for Alternative B has been ongoing, and as a result, the anticipated permitting schedule would be anticipated to be short.

The straight-line distance between the processing facility and the TMF is 0.8 km. The elevation difference between the TMF and the mill for Alternative B is the second smallest with the crest elevation of the final TMF embankment being 164 masl. As Alternative B uses a conventional slurry tailings design, the complexity of the processing is low, although it will require a tailings pipeline distance of 3.5 km. Given the pipeline length, there is only a moderate risk of freezing if not drained/ not in continuous use. Overall, the complexity of depositing tailings for this alternative is based on conventional slurry tailings deposition methodology and is therefore considered to be low complexity.

Alternative B will be constructed for a conventional slurry tailings management, and there is sufficient geotechnical data in the area of the TMF to assess foundation conditions. It is anticipated that the distance to haul suitable dam construction materials would be less than 1.5 km, which is the shortest distance.

7.2.4 **Project Economics Characterization**

Alternative B is projected to have the second lowest overall costs out of the seven alternatives.



The capital cost of building Alternative B is the fourth lowest, due to a larger footprint requiring additional area to clear and grub. The dam volume requires the fourth highest amount of material during the construction of the starter dam. The sustaining capital costs of Alternative B is the fourth smallest (higher than Alternative A, E and F), as the amount of dam material during subsequent raises will be average amount of all alternatives. The operating costs for Alternative B are the second lowest of the conventional slurry tailings options due to the distance and elevation required to pump the tailings and the reclaim water for processing. The closure and post-closure costs for Alternative B are the second highest due to the size of the tailings area to be reclaimed, although there are substantial costs associated with the reclamation of the pumps and pipelines for this alternative.

Due to the adequate amount of baseline geotechnical and environmental data for this location, and the development of preliminary engineering studies, there is minimal risk of the ability to obtain the initial permit for this alternative. This is not expected to change the net present value of the Project.

7.2.5 Socio-Economic Characterization

Loss of recreational fishing opportunities are the second smallest with Alternative B due to limited loss of waterbody and watercourse fish habitat. The loss of commercial forest harvesting is limited to 1 ha, however the loss of ATV trails is the fourth largest with Alternative B. There will be no impact to private land ownership with this alternative.

The potential for fugitive dust is lower with the conventional slurry tailings design, compared to the filtered tailings, particularly with the second largest footprint (142 ha) for Alternative B, although it is located 0.8 km from the processing facility, which will minimize the generation of dust from construction traffic. The potential for a hazard to the public is lower with Alternative B due to the distance of the tailings facility to Fifteen Mile Stream (3.6 km) although there is a public road crossing approximately 0.85 km downstream. The risk to workers from a potential failure with Alternative B is considered to be lower than the other alternatives due to the third lowest dam height of 32 m and the third farthest distance from the mine workings (3.5 km).

Operational impacts from Alternative B are anticipated to be moderate. The visual impacts from this alternative will be relatively low due to third lowest crest elevation of the dam (32 m) and the location of the TMF is the fourth furthest from the close sensitive receptor, to the south.

Due to the fact this alternative has a low capital and operating cost, it is anticipated to be resilient to fluctuations in the market price of gold and it unlikely that there would be a need to place the operation in temporary care and maintenance. As a result, the impact to local jobs and business opportunities is unlikely to be impacted.



7.3 Alternative C: Location #4, Filtered Tailings

7.3.1 Overview

Alternative C utilizes filtered tailings technology with the TMF located to the east of the open pit (Location #4), in the same general location as Alternative B. It has the fourth largest TMF footprint of all the alternatives and is in close proximity to the centroid of the open pit (Figure 10).

7.3.2 Environmental Characterization

Alternative C has a smaller water storage volume of 1.48 Mm³, within six water managements ponds including two main water management ponds and four seepage management ponds. The closest receiving waterbody is Anti-Dam Flowage, which has a large assimilative capacity. Alternative C will be located over the watershed divide of two subwatersheds, and the design will indirectly result in a reduction of flows (>25%) along a 4,999 m length of the associated watercourses, which is the second largest of all alternatives. There are no watercourse realignments associated with Alternative C, and it will not directly overprint waterbody fish habitat but will directly overprint the third largest amount of watercourse fish habitat (831 m). It is anticipated that there will be no watercourse crossings required to construct and operate Alternative C.

Alternative C has the fourth largest footprint at 122.7 ha, and will use the fourth largest amount of previously disturbed habitat (3.5 ha). Alternative C will impact the second largest amount of wetland (11.3 ha) and it is anticipated to impact the second largest mainland moose habitat (11.3 ha). It is assumed that all watercourse habitat will support Brook Trout in some capacity and therefore 831 m will be impacted, which is the third largest of the alternatives.

Fugitive dust could be generated from Alternative C which has the largest filtered tailings area (122.7 ha) although the access road for construction of the TMF and deposition of tailings during operation would be 0.9 km (fourth smallest). The ability to minimize GHG emissions generated from the construction of the tailings starter dam and water management ponds are predicted to be very poor, as clearing is within a larger sized area (105 ha), with a small volume (1.04 Mm³) of dam construction materials to be hauled over a short distance (<1.5 km) and nearly 40,000 trips to deposits the tailings during operations. The distance from the centroid of Alternative C to the closest receptor is approximately 5.8 km, which is third largest distance and would therefore have the greater impact in terms of noise emissions.

The closest protected area is the Toadfish Lakes Wilderness Area, which is approximately 1,527 m from the centroid of Alternative C, which is the smallest distance.

In the event of a TMF dam failure, the magnitude of a failure would be dependent on the height and length of the dam. In addition, there will be two water management ponds for this alternative, in which the northern pond will have a dam height of 10 m and length of 1.15 km. Alternative C has the smallest dam height (23 m) with the largest dam length of 4.0 km. The most sensitive area downstream is Fifteen Mile Stream, which is located 3.65 km from Alternative C, but there is public infrastructure (road crossing for a local road access) located 0.85 km downstream.



7.3.3 Technical Characterization

The design of Alternative C has a storage efficiency of 2.9, which is the third smallest. The total TMF dam volume required for Alternative C is the third smallest (4.37 Mm³), with an additional 0.35 Mm³ required to construct the water management ponds. Tailings dams are required around most of the perimeter, with a large primary dam. Alternative C is located in an area that provides limited opportunities to take advantages of natural topography on any side.

With respect to safety, there are eight bends in the TMF dam for Alternative C, which is the second largest. It has a dam length of 4.0 km and dam height of 23 m which is the shortest. The TMF dam design is based on a rockfill structure for filtered tailings with a surface area of 122.7 ha, two main water management ponds and 3.65 km of seepage ditching to manage fugitive dust and seepage.

For management of contact runoff, Alternative C will not require any non-contact water diversion ditches, and will require surplus water management systems from the two water management ponds consisting of a total of 3.74 km of pipeline, and a pump per pond to transfer excess water to the water treatment plant. It is anticipated that 210 ha of the associated watershed will be impacted, which is the second largest of all alternatives. Approximately 3.65 km of seepage ditching will be required around the perimeter of the TMF, which is the fourth largest (same as Alternative B). Alternative C will also require a 3.0 km long pipeline to return reclaim water from the TMF to the mill, which is the third largest.

The starter embankment for Alternative C requires approximately 0.69 Mm³ of dam fill material, which is the third smallest. The final embankment for Alternative C would require the second largest amount of dam construction material, at an additional 3.68 Mm³. In addition, it would require the fifth largest additional seepage ditching (850 m) of all alternatives.

With respect to the ability to obtain the initial environmental permits, Alternative C has good baseline geotechnical knowledge and some preliminary engineering studies completed for the filtered tailings design. Consultation for Alternative C has been limited, and as a result, the anticipated permitting schedule would be anticipated to be long primarily due to the use of a non-conventional technology.

As Alternative C uses a filtered tailings design, the complexity of the processing and tailings disposal is high due to extensive human invention required, particularly in transporting tailings at least a distance of 0.8 km (straight-line) from the processing facility. The elevation difference between the TMF and the mill for Alternative C is the largest with the crest elevation of the final TMF embankment being 173 masl.

Alternative C will be constructed for filtered tailings management and has good geotechnical data in the area of the TMF to assess foundation conditions. It is anticipated that the distance to haul suitable dam construction materials would be less than 1.5 km, which is the shortest distance.

7.3.4 **Project Economics Characterization**

Alternative C is projected to have the highest overall costs out of the seven alternatives.

The capital cost of building Alternative C is the third highest, due to a larger footprint requiring additional area to clear and grub, and the cost to construct a filter plant to dewater the tailings to obtain a filtered



tailings product. The dam volume requires the fifth highest amount of material during the construction of the starter dam and water management ponds. The sustaining capital costs of Alternative C is the highest, as the amount of dam material will be the highest of the alternatives during subsequent raises. The operating costs for Alternative C are the second highest of the filtered tailings options, and second highest of all alternatives due to the cost to operate the filter plant and the costs to haul, place and compact the filtered tailings material. The closure and post-closure costs for Alternative C are the second lowest due to the limited amount of materials required to reclaim the area, although there are substantial costs associated with the reclamation of the pumps and pipelines (surplus and reclaim water) for this alternative.

Although there is an adequate amount of baseline geotechnical and environmental data for this location, and partial development of some preliminary engineering studies, there is a risk to the ability to obtain the initial permit for this alternative due to the use of a non-conventional technology. This could reduce the Project net present value by as much as \$11.4 million.

7.3.5 Socio-Economic Characterization

Loss of recreational fishing opportunities are the third highest with Alternative C due to the loss of waterbody and watercourse fish habitat. There is no loss of commercial forest harvesting, however the loss of ATV trails is the second largest (1,284 m) with Alternative C. There will be no impact to private land ownership with this alternative.

The potential for fugitive dust with the filtered tailings design is high, particularly as Alternative C has the largest footprint (122 ha) of the filtered tailings option, and requires the approximately 40,000 truck trips to transport the tailings along a distance of 0.9 km from the processing facility. The potential for a hazard to the public is lower with Alternative C due to the distance of the tailings facility to Fifteen Mile Stream (3.6 km) although there is a public road crossing approximately 0.85 km downstream. The risk to workers from a potential failure with Alternative C is considered to be lower than the other alternatives due to the shortest dam height of 23 m and the shortest distance from the mine workings (0.8 km).

Operational impacts from Alternative C are anticipated to be moderate. The visual impacts from this alternative will be relatively low as the crest elevation of the dam is the lowest (23 m) and the location of the TMF is the third largest from the close sensitive receptor, to the south.

Due to the fact this alternative has a high capital and operating cost, it is not anticipated to be resilient to fluctuations in the market price of gold and may be at risk to place the operation in temporary care and maintenance. As a result, the impact to local jobs and business opportunities could be impacted.

7.4 Alternative D: Location #5, Conventional Slurry Tailings

7.4.1 Overview

Alternative D utilizes conventional slurry tailings management in a TMF that is is also located to the east of the open pit (Location #5; see Figure 11). It has the third largest TMF footprint of all the alternatives and is closer in proximity to the centroid of the open pit than Alternative B, C and G.



7.4.2 Environmental Characterization

Alternative D has a water storage volume of 1.6 Mm³, with five water managements ponds including the TMF supernatant pond and four seepage management ponds. The closest receiving waterbody is Anti-Dam Flowage, which has a large assimilative capacity. Alternative D will be located over the watershed divide of three subwatersheds, and the design will indirectly result in a reduction of flows (>25%) along a 2,983 m length of the associated watercourses, which is the fourth smallest of all alternatives. There are no watercourse realignments associated with Alternative D, however it will directly overprint 0.1 ha of waterbody fish habitat and 205 m of watercourse fish habitat. It is anticipated that there will be no watercourse crossings required to construct and operate Alternative D.

Alternative D has the third largest footprint at 122.8 ha, and will use the largest amount of previously disturbed habitat (5.1 ha). Alternative D will impact the fourth largest amount of wetland (7.5 ha) and it is anticipated to impact the fifth largest mainland moose habitat (7.6 ha). It is assumed that all watercourse habitat will support Brook Trout in some capacity and therefore 205 m will be impacted, which is the second smallest of the alternatives.

Fugitive dust could be generated from Alternative D which has the third largest slurry tailings area (122.8 ha) during drier conditions although there would only be a distance of 0.5 km (shortest) to travel during construction which could generate dust. The ability to minimize GHG emissions generated from the construction of the tailings starter dam are predicted to be fair, as clearing is within a moderately sized area (88 ha), with a small volume (1.57 Mm³) of dam construction materials to be hauled over a short distance (<1.5 km). The distance from the centroid of Alternative D to the closest receptor is approximately 5.6 km, which is seventh largest distance and would therefore have the greater impact in terms of noise emissions.

The closest protected area is the Toadfish Lakes Wilderness Area, which is approximately 1.7 km from the centroid of Alternative D, which is the fourth smallest.

In the event of a TMF dam failure, the magnitude of a failure would be dependent on the height and length of the dam. Alternative D has the second largest dam height (40 m) with the second longest dam length of 3,600 m. The most sensitive area downstream is Fifteen Mile Stream, which is located 2.9 km from Alternative D, but there is public infrastructure (road crossing for a local road access) located 0.85 km downstream.

7.4.3 Technical Characterization

The design of Alternative D has a storage efficiency of 2.8, which is the fifth largest. The dam volume of the final embankment for Alternative D is the second largest (4.59 Mm³). Tailings dams are required along a large portion of the perimeter, with a large primary dam. Alternative D is located in an area that provides some opportunities to take advantage of natural topography, particularly on the south edge.

With respect to safety, there are six bends in the TMF dam for Alternative D, which is the third largest. It has a dam length of 3.6 km and dam height of 40 m which are the second largest. The TMF dam design is based on a rockfill structure for conventional slurry tailings with five water management ponds (four seepage ponds and one supernatant pond) and 3.5 km of seepage ditching.



For management of contact runoff, Alternative D will not require any non-contact water diversion ditches, and will require surplus water management systems consisting of a 1.25 km of pipeline and one pump to transfer excess water to the water treatment plant. It is anticipated that 155 ha of the associated watershed will be impacted, which is the second smallest of all alternatives. Approximately 3.5 km of seepage ditching will be required around the perimeter of the TMF, which is the third largest. Alternative D will also require a 2.2 km long pipeline to return reclaim water from the TMF to the mill, which is the second smallest.

The starter embankment for Alternative D requires approximately 1.57 Mm³ of dam fill materials to construct, which is the largest. The final embankment for Alternative D would require an additional 3.02 Mm³ of dam fill materials to construct, which is the third largest. In addition, it would require the fourth largest additional seepage ditching (1.0 km) of all alternatives.

With respect to the ability to obtain the initial environmental permits, Alternative D has some baseline geotechnical knowledge and some engineering studies completed for the conventional slurry tailings design. Consultation for Alternative D has been partial, and as a result, the anticipated permitting schedule would be anticipated to be moderate.

The straight-line distance between the processing facility and the TMF is 0.5 km. The elevation difference between the TMF and the mill for Alternative D is the third highest with the crest elevation of the final TMF embankment being 168 masl. As Alternative D uses a conventional slurry tailings design, the complexity of the processing is low, although it will require a tailings pipeline distance of 3.5 km. Given the pipeline length, there is a lower risk of freezing if not drained/ not in continuous use. Overall, the complexity of depositing tailings for this alternative is based on conventional slurry tailings deposition methodology and is therefore considered to be low complexity.

Alternative D will be constructed for conventional slurry tailings disposal, however there is currently limited geotechnical data in the area of the TMF dam to assess the suitability of foundation conditions. It is anticipated that the distance to haul suitable dam construction materials would be less than 1.5 km, which is the shortest distance.

7.4.4 **Project Economics Characterization**

Alternative D is projected to have the third lowest overall costs out of the seven alternatives.

The capital cost of building Alternative D is the second highest, due to the amount of dam construction material required. The dam volume requires the most amount of material during the construction of the starter dam. The sustaining capital costs of Alternative D is the third highest (less than Alternative C and G), as the amount of dam material required and area to be cleared will be greater than other alternatives during subsequent raises. The operating costs for Alternative D are the third lowest of the conventional slurry tailings options due to the distance and elevation required to pump the tailings and the reclaim water for processing. The closure and post-closure costs for Alternative D are the third highest due to the size of the tailings area to be reclaimed.

The amount of baseline geotechnical data would need to be increased, however there is adequate environmental data for this location. As a result, the development of preliminary engineering studies could



be completed in a shorter period of time thereby reducing the risk associated with not obtaining the initial permit for this alternative. It is expected to reduce the net present value by approximately \$3.8 million.

7.4.5 Socio-Economic Characterization

Loss of recreational fishing opportunities are the third smallest with Alternative D due to limited loss of waterbody and watercourse fish habitat. The loss of commercial forest harvesting is limited to 1.5 ha, however the loss of ATV trails is the second highest with Alternative D. There will be no impact to private land ownership with this alternative.

The potential for fugitive dust is lower with the conventional slurry tailings design, compared to the filtered tailings, particularly with the third largest footprint (122 ha) for Alternative D, although it is located 0.5 km from the processing facility, which will minimize the generation of dust from construction traffic.

The potential for a hazard to the public is lower with Alternative D due to the distance of the tailings facility to Fifteen Mile Stream (2.9 km) although there is a public road crossing approximately 0.85 km downstream.

The risk to workers from a potential failure with Alternative D is considered to be higher in comparison to the other alternatives due to the second highest dam height of 40 m and the third farthest distance from the mine workings (3.5 km).

Operational impacts from Alternative D are anticipated to be higher. The visual impacts from this alternative will be relatively high due to the second highest dam crest elevation (40 m), and the shortest distance from the TMF to the close sensitive receptor, to the south.

Due to the fact this alternative has a slightly higher capital and operating cost, it is anticipated to be influenced by fluctuations in the market price of gold and it could result in the need to place the operation in temporary care and maintenance. As a result, there is a potential risk to local jobs and business opportunities.

7.5 Alternative E: Location #5, Filtered Tailings

7.5.1 Overview

Alternative E utilizes filtered tailings management at a TMF that is also located to the east of the open pit (Location #5; see Figure 12). It has the second smallest TMF footprint of all the alternatives and is closer in proximity to the centroid of the open pit than Alternative B, C and G.

7.5.2 Environmental Characterization

Alternative E has the smallest water storage volume of 1.38 Mm³, within six water managements ponds including two main water management ponds and four seepage management ponds. The closest receiving waterbody is Anti-Dam Flowage, which has a large assimilative capacity. Alternative E will be located over the watershed divide of three subwatersheds, and the design will indirectly result in a reduction of flows (>25%) along a 2,757 m length of the associated watercourses, which is the fifth largest of all alternatives. There are no watercourse realignments associated with Alternative E, and it will directly overprint 0.1 ha of



waterbody fish habitat and the second smallest amount of watercourse fish habitat (122.4 m). It is anticipated that there will be no watercourse crossings required to construct and operate Alternative E.

Alternative E has the smallest footprint at 111.6 ha, and will use the fourth largest amount of previously disturbed habitat (3.9 ha). Alternative E will impact the least amount of wetland (5.7 ha) and it is anticipated to impact the smallest amount of mainland moose habitat (5.8 ha). It is assumed that all watercourse habitat will support Brook Trout in some capacity and therefore 122 m will be impacted, which is the second smallest of the alternatives.

Fugitive dust could be generated from Alternative E which has the smallest filtered tailings area (111 ha) although the access road for construction of the TMF and deposition of tailings during operation would be 0.6 km (shortest). The ability to minimize GHG emissions generated from the construction of the tailings starter dam and water management ponds are predicted to be poor, as clearing is within a larger sized area (105 ha), with a small volume (1.35 Mm³) of dam construction materials to be hauled over a short distance (<1.5 km) and nearly 40,000 trips to deposits the tailings during operations. The distance from the centroid of Alternative E to the closest receptor is approximately 5.6 km, which is sixth largest distance and would therefore have the greater impact in terms of noise emissions.

The closest protected area is the Toadfish Lakes Wilderness Area, which is approximately 1.84 km from the centroid of Alternative E, which is the fifth shortest distance.

In the event of a TMF dam failure, the magnitude of a failure would be dependent on the height and length of the dam. In addition, there will be two water management ponds for this alternative, in which the northern pond will have a dam height of 11 m and length of 1.03 km. Alternative E has the highest dam height (48 m) with the largest dam length of 3.3 km. The most sensitive area downstream is Fifteen Mile Stream, which is located 2.7 km from Alternative E, but there is public infrastructure (road crossing for a local road access) located 0.85 km downstream.

7.5.3 Technical Characterization

The design of Alternative E has a storage efficiency of 2.5, which is the smallest. The total TMF dam volume for Alternative E is the fourth smallest (3.96 Mm³), with an additional 0.62 Mm³ required to construct the water management ponds. Tailings dams are required around all of the perimeter, with a large primary dam. Alternative E is located in topography that provides limited opportunities to take advantages of natural topography on any side.

With respect to safety, there are nine bends in the TMF dam for Alternative E, which is the largest. It has a dam length of 3.3 km and dam height of 48 m which is the highest. The TMF dam design is based on a rockfill structure for filtered tailings with a surface area of 111.6 ha, two main water management ponds and 5.69 km of seepage ditching to manage fugitive dust and seepage.

For management of contact water runoff, Alternative E will not require any non-contact water diversion ditches, and will require a surplus water management system for each water management pond consisting of one pump per pond, and a total of 1.47 km of pipeline, to transfer excess water to the water treatment plant. It is anticipated that 158 ha of the associated watershed will be impacted, which is the fifth largest of



all alternatives. Approximately 5.69 km of seepage ditching will be required around the perimeter of the TMF, which is the largest. Alternative E will also require a 1.5 km long pipeline to return reclaim water from the TMF to the mill, which is the shortest.

The starter embankment for Alternative E requires approximately 1.09 Mm³ of dam fill materials to construct, which is the fourth largest. The final embankment for Alternative E would require an additional 2.87 Mm³ of dam fill materials to construct, which is the third largest. In addition, it would require the smallest amount of additional seepage ditching (0.7 km) of all alternatives.

With respect to the ability to obtain the initial environmental permits, Alternative E has good baseline geotechnical knowledge and some preliminary engineering studies completed for the filtered tailings design. Consultation for Alternative E has been limited, and as a result, the anticipated permitting schedule would be anticipated to be long primarily due to the use of a non-conventional technology.

As Alternative E uses a filtered tailings design, the complexity of the processing and tailings disposal is high due to extensive human invention required, particularly in transporting tailings a distance of 0.5 km (straight-line) from the processing facility. The elevation difference between the TMF and the mill for Alternative E is the second largest with the crest elevation of the final TMF embankment being 171 masl

Alternative E will be constructed for filtered tailings management, and there is limited geotechnical data in the area of the TMF to assess foundation conditions. It is anticipated that the distance to haul suitable dam construction materials would be less than 1.5 km, which is the smallest distance.

7.5.4 **Project Economics Characterization**

Alternative E is projected to have the second highest overall costs out of the seven alternatives.

The capital cost of building Alternative E is the highest, due to a footprint requiring additional area to clear and grub, the requirement of pipelines and other infrastructure, and the poor storage-to-dam volume ratio. The dam volume requires the second highest amount of material during the construction of the starter dam. The sustaining capital costs of Alternative E is the second lowest, primarily due to the limited requirement to grub the area after the initial work, during subsequent raises. The operating costs for Alternative E are the highest of the filtered tailings options, and highest of all alternatives due to the technology being used. The closure and post-closure costs for Alternative E are the lowest due to the limited amount of materials required to reclaim the area, although there are substantial costs associated with the reclamation of the access road for this alternative.

Although there is an adequate amount of baseline geotechnical and environmental data for this location, and partial development of some preliminary engineering studies, there is a risk to the ability to obtain the initial permit for this alternative due to the use of a non-conventional technology. This could reduce the Project net present value by as much as \$11.4 million.

7.5.5 Socio-Economic Characterization

Loss of recreational fishing opportunities are the second smallest with Alternative E due to the limited loss of waterbody and watercourse fish habitat. There is a 1.1 ha loss of commercial forest harvesting, however



the loss of ATV trails is the second smallest (679 m) with Alternative E. Where there will be an impact to private land ownership, this alternative will have a loss of 1.3 ha loss.

The potential for fugitive dust with the filtered tailings design is high, despite that Alternative E has the smallest footprint (111 ha) of the filtered tailings option, but still requires approximately 40,000 truck trips to transport the tailings along a distance of 0.6 km from the processing facility. The potential for a hazard to the public is lower with Alternative E due to the distance of the tailings facility to Fifteen Mile Stream (2.7 km) although there is a public road crossing approximately 0.85 km downstream. The risk to workers from a potential failure with Alternative E is considered to be higher than the other alternatives due to the highest dam height of 48 m and the shortest distance from the mine workings (0.5 km).

Operational impacts from Alternative E are anticipated to be higher. The visual impacts from this alternative will be relatively high as the crest elevation of the dam is the highest (48 m) and the location of the TMF is the fifth furthest from the close sensitive receptor, to the south.

Due to the fact this alternative has a high capital and operating cost, it is not anticipated to be resilient to fluctuations in the market price of gold and may be at risk to place the operation in temporary care and maintenance. As a result, the impact to local jobs and business opportunities could be impacted.

7.6 Alternative F: Location #7, Conventional Slurry Tailings

7.6.1 Overview

Alternative F utilizes conventional slurry tailings management with the TMF located to the west of the open pit (Location#7). It has the largest TMF footprint of all the alternatives and is located more than 4 km to the west of the centroid of the open pit (Figure 13).

7.6.2 Environmental Characterization

Alternative F has a water storage volume of 1.6 Mm³ in, within three water managements ponds including the TMF supernatant pond and two seepage management ponds. The closest receiving waterbody is a tributary of Seloam Lake, which has a small assimilative capacity. Alternative F will be located within one subwatersheds, and the design will indirectly result in the reduction of flows (>25%) along a 1,975 m length of the associated watercourses, which is the second smallest of all alternatives. A required watercourse realignment of 198 m would be required for Alternative F to divert water around the TMF. In addition, Alternative F will directly overprint 0.4 ha of waterbody fish habitat and a total of 3.7 km of watercourse fish habitat. It is anticipated that there will two watercourse crossings required to construct and operate Alternative F.

Alternative F has the largest footprint at 158.2 ha, and will use the second largest amount of previously disturbed habitat (4.2 ha). Alternative F will impact the third largest amount of wetland (9.5 ha) and it is anticipated to impact the third largest mainland moose habitat (9.9 ha). It is assumed that all watercourse habitat will support Brook Trout in some capacity and therefore 3,687 m will be impacted, which is the largest, of the alternatives.



Fugitive dust could be generated from Alternative F which has the largest slurry tailings area (158 ha) during drier conditions and includes travel distance of 6.0 km (longest) during construction which could generate dust. The ability to minimize GHG emissions generated from the construction of the tailings starter dam are predicted to be fair, as clearing is within a moderately sized area (84 ha), with a small volume (0.39 Mm³) of dam construction materials to be hauled over a long distance (<7.5 km). The distance from the centroid of Alternative F to the closest receptor is approximately 9.3 km, which is second largest distance and would therefore have a smaller impact in terms of noise emissions.

The closest protected area is the Abraham Lake Wilderness Area, which is approximately 2.2 km from the centroid of Alternative F, which is the second largest.

In the event of a TMF dam failure, the magnitude of a failure would be dependent on the height and length of the dam. Alternative F has the fourth largest dam height (32 m) with the shortest dam length of 2.05 km. The most sensitive area downstream is Fifteen Mile Stream, which is located 2.1 km from Alternative F, but there is a transmission line located 1.3 km and road crossing 2.0 km downstream of the TMF.

7.6.3 Technical Characterization

The design of Alternative F has a storage efficiency of 11.5, which is the largest and most favourable. The total dam volume for Alternative F is the smallest (1.37 Mm³). Alternative F is located in a bowl like basin that provides excellent containment and is surrounded by high ground for most of the perimeter, with a moderate dam required at the outlet of the bowl.

With respect to safety, there are two bends in the TMF dam for Alternative F, which is the smallest number. It has a dam length of 2.05 km and dam height of 32 m which are the third largest. The TMF dam design is based on a rockfill structure for conventional slurry tailings with three water management ponds (two seepage ponds and one supernatant pond) and 2.2 km of seepage ditching.

For management of contact water runoff, Alternative F will require 3.1 km of ditching to divert non-contact water around the TMF, and a surplus water management system consisting of a 7.2 km long pipeline and two pumps to transfer excess water to the water treatment plant. It is anticipated that 235 ha of the associated watershed will be impacted, which is the largest of all alternatives. Approximately 2.2 km of seepage ditching will be required around the perimeter of the TMF, which is the smallest amount. Alternative F will also require a 7.7 km long pipeline to return reclaim water from the TMF to the mill, which is the longest.

The starter embankment for Alternative F would require approximately 0.38 Mm³ to construct, which is the second smallest. The final embankment for Alternative F would require an additional 0.99 Mm³ of dam fill material to construct, which is the smallest amount. In addition, it would require the second smallest amount of additional seepage ditching (0.8 km) of all alternatives.

With respect to the ability to obtain the initial environmental permits, Alternative F has minimal baseline geotechnical knowledge and engineering studies completed for a conventional slurry tailings design. Consultation for Alternative F has been limited, however given the use of conventional technology, the anticipated permitting schedule would be moderate.



The straight-line distance between the processing facility and the TMF is 6 km. The elevation difference between the TMF and the mill for Alternative F is the second smallest with the crest elevation of the final TMF embankment being 149 masl. As Alternative F uses a conventional slurry tailings design, the complexity of the processing is low, although it will require a tailings pipeline distance of 9 km. Given the pipeline length, there is a higher risk of freezing if not drained/ not in continuous use. Overall, the complexity of depositing tailings for this alternative is based on conventional slurry tailings deposition methodology and is therefore considered to be low complexity.

Alternative F will be constructed for conventional slurry tailings management, however, there is currently limited geotechnical data in the area of the TMF to assess the suitability of foundation conditions. It is anticipated that the distance to haul suitable dam construction materials would be less than 7.5 km, which is the longest distance.

7.6.4 **Project Economics Characterization**

Alternative F is projected to have the third highest overall costs out of the seven alternatives.

The capital cost of building Alternative F is the second lowest, due to the lower amount of dam construction material required. The dam volume requires the least amount of material during the construction of the starter dam. The sustaining capital costs of Alternative F is the second lowest (greater than Alternative E), although the amount of clearing will be greater than other alternatives during subsequent raises. The operating costs for Alternative F are the third highest of the conventional slurry tailings options due to the distance and elevation required to pump the tailings and the reclaim water for processing. The closure and post-closure costs for Alternative F are the highest due to the size of the tailings area to be reclaimed and the distance to transport materials.

The quality of baseline geotechnical data for this TMF alternative would need to be improved. Similarly, there are gaps in the environmental data for this location which would need to be improved. As a result, the development of preliminary engineering studies could be completed in a longer period of time thereby increasing the risk associated with not obtaining the initial permit for this alternative. It is expected to reduce the Project net present value by approximately \$7.6 million.

7.6.5 Socio-Economic Characterization

Loss of recreational fishing opportunities are the second most with Alternative F due to a substantial loss of watercourse fish habitat. Alternative F will result in the largest loss of commercial forest harvesting at 4.6 ha, and the largest loss of ATV trails at 2.01 km. Where there will be an impact to private land ownership, this alternative will have the largest impact at 51.5 ha.

The potential for fugitive dust is lower with the conventional slurry tailings design, compared to the filtered tailings, particularly with the largest footprint (158 ha) for Alternative F, although it is located 6.0 km from the processing facility, which will increase the generation of dust from construction traffic. The potential for a hazard to the public is lower with Alternative F due to the distance of the tailings facility to Fifteen Mile Stream (2.1 km) although there is a transmission line and public road crossing within this distance. The risk to workers from a potential failure with Alternative F is considered to be higher in comparison to the other



alternatives due to the third largest dam height of 32 m and the second farthest distance from the mine workings (6.0 km).

Operational impacts from Alternative F are anticipated to be higher. The visual impacts from this alternative will be moderate due to the third highest dam crest elevation (32 m), and the shortest distance from the TMF to the close sensitive receptor, to the south.

Due to the fact this alternative has the lowest capital and operating cost, it is not anticipated to be influenced by fluctuations in the market price of gold and, in fact, could reduce the need to place the operation in temporary care and maintenance. As a result, there is unlikely to be a risk to local jobs and business opportunities.

7.7 Alternative G: Location #4 (Adjusted), Conventional Slurry Tailings

7.7.1 Overview

Alternative G is a variation of Alternative B which adjusts the eastern limb of the TMF dam to avoid overprinting fish frequented waters. Similar to Alternative B, it utilizes conventional slurry tailings management with the TMF located to the east of the open pit (Location #4; see Figure 14). It has the third smallest TMF footprint of all the alternatives and is in close proximity to the centroid of the open pit.

7.7.2 Environmental Characterization

Alternative G has a water storage volume of 1.6 Mm³ in, within three water managements ponds including the TMF supernatant pond and two seepage management ponds. The closest receiving waterbody is Anti-Dam Flowage, which has a large assimilative capacity. Alternative G will be located within one subwatersheds, and the design will result in the reduction of flows (>25%) along a 4,279 m length of the associated watercourses, which is the third largest of all alternatives. There is no required watercourse realignment for Alternative G. In addition, there will be no direct overprinting of waterbody or watercourse fish habitat. It is anticipated that there will no watercourse crossings required to construct and operate Alternative G.

Alternative G has the third largest footprint at 112.7 ha, and will use the second smallest amount of previously disturbed habitat (3.3 ha). Alternative G will impact the fifth largest amount of wetland (7.1 ha) and it is anticipated to impact the second smallest amount of mainland moose habitat (7.1 ha).

Fugitive dust could be generated from Alternative G which has the third smallest slurry tailings area (122 ha) during drier conditions and includes travel distance of 0.7 km (second shortest) during construction which could generate dust. The ability to minimize GHG emissions generated from the construction of the tailings starter dam are predicted to be fair, as clearing is within a small area (66 ha), with a moderate volume (1.27 Mm³) of dam construction materials to be hauled over a short distance (<1.5 km). The distance from the centroid of Alternative F to the closest receptor is approximately 9.3 km, which is second largest distance and would therefore have a smaller impact in terms of noise emissions.

The closest protected area is the Toadfish Lakes Wilderness Area, which is approximately 1.6 km from the centroid of Alternative G, which is the third shortest.



In the event of a TMF dam failure, the magnitude of a failure would be dependent on the height and length of the dam. Alternative G has the third highest dam height (36 m) with the second longest dam length of 3.6 km. The most sensitive area downstream is Fifteen Mile Stream, which is located 3.6 km from Alternative G, with a road crossing located 0.85 km downstream.

7.7.3 Technical Characterization

The design of Alternative G has a storage efficiency of 2.94, which is the fourth highest. The total dam volume for Alternative G is the highest (4.98 Mm³). Tailings dams are required along a large portion of the perimeter with a large primary dam. The TMF is located in topography that provides some advantages on the south edge.

With respect to safety, there are seven bends in the TMF dam for Alternative G, which is the third highest. It has a dam length of 3.6 km and dam height of 36 m which are the third highest. The TMF dam design is based on a rockfill structure for conventional slurry tailings management with three water management ponds (two seepage ponds and one supernatant pond) and 4.1 km of seepage ditching.

For management of contact water runoff, Alternative G will not require any non-contact water ditching, but will require a surplus water management system consisting of two pumps and a 0.82 km long pipeline to transfer excess water to the water treatment plant. It is anticipated that 145 ha of the associated watershed will be impacted, which is the smallest of all alternatives. Approximately 4.1 km of seepage ditching will be required around the perimeter of the TMF, which is the second largest. Alternative G will also require a 2.2 km long pipeline to return reclaim water from the TMF to the mill, which is the fourth largest.

The starter embankment for Alternative G requires approximately 1.27 Mm³ of dam fill material to construct, which is the second largest. The final embankment for Alternative G would require an additional 3.71 Mm³ of dam fill material to construct, which is the largest amount. In addition, it would require the second largest amount of additional seepage ditching (1.6 km) of all alternatives.

With respect to the ability to obtain the initial environmental permits, Alternative G has good baseline geotechnical knowledge and some engineering studies completed for a conventional slurry tailings design. Consultation for Alternative G has been limited, however given the use of conventional technology, the anticipated permitting schedule would be moderate.

The straight-line distance between the processing facility and the TMF is 0.7 km. The elevation difference between the TMF and the mill for Alternative C is the third largest with the crest elevation of the final TMF embankment being 168 masl. As Alternative G uses a conventional slurry tailings design, the complexity of the processing is low, although it will require a tailings pipeline distance of 3.5 km. Given the pipeline length, there is a lower risk of freezing if not drained/ not in continuous use. Overall, the complexity of depositing tailings for this alternative is based on conventional slurry tailings deposition methodology and is therefore considered to be low complexity.

Alternative G will be constructed for conventional slurry tailings management, and since there is an adequate amount of geotechnical data in the area of the TMF, the suitability of foundation conditions is



considered good. It is anticipated that the distance to haul suitable dam construction materials would be less than 1.5 km, which is the shortest distance.

7.7.4 **Project Economics Characterization**

Alternative G is projected to have the fifth highest overall costs out of the seven alternatives.

The capital cost of building Alternative G is the third lowest, due to the minimal clearing and pipeline infrastructure required. The dam volume requires the third lowest amount of material during the construction of the starter dam. The sustaining capital costs of Alternative G is the second highest (greater than Alternative C), although the amount of dam construction materials and haulage will be greater than other alternatives during subsequent raises. The operating costs for Alternative G is the lowest of the conventional slurry tailings options due to the distance and elevation required to pump the tailings and the reclaim water for processing. The closure and post-closure costs for Alternative G are the fourth highest in comparison to other alternatives.

The quality of baseline geotechnical data for the TMF location may not need to be improved, however there may be inadequate environmental data for this location. As a result, the development of preliminary engineering studies could be completed in a shorter period of time thereby reducing the risk associated with not obtaining the initial permit for this alternative. It is expected to reduce the Project net present value by approximately \$7.6 million.

7.7.5 Socio-Economic Characterization

Loss of recreational fishing opportunities are the smallest with Alternative G due no loss of fish habitat. Alternative G will result in a moderate loss of commercial forest harvesting at 1.3 ha, and the second smallest loss of ATV trails at 0.7 km. There will be no loss of private land ownership with this alternative.

The potential for fugitive dust is lower with the conventional slurry tailings design, compared to the filtered tailings, particularly with the third largest footprint (112 ha) for Alternative G, although it is located 0.7 km from the processing facility, which will slightly increase the generation of dust from construction traffic. The potential for a hazard to the public is lower with Alternative G due to the distance of the tailings facility to Fifteen Mile Stream (3.6 km) although there is a public road crossing 0.85 km downstream. The risk to workers from a potential failure with Alternative G is considered to be higher in comparison to the other alternatives due to the third highest dam height of 36 m and the second closest distance from the mine workings (0.7 km).

Operational impacts from Alternative G are anticipated to be higher. The visual impacts from this alternative will be moderate due to the third highest dam crest elevation (36 m), and the longer distance from the TMF to the close sensitive receptor, to the south.

Due to the fact this alternative has the third highest capital and operating cost, it is anticipated to be influenced by fluctuations in the market price of gold and, in fact, could increase the need to place the operation in temporary care and maintenance. As a result, there is a possibility of a risk to local jobs and business opportunities.

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8.0 MULTIPLE ACCOUNTS LEDGER

8.1 Selection of Sub-Accounts and Indicators

Sub-accounts and indicators were chosen using the methodology described in Section 4.4 and in accordance with the Guidelines. Sub-accounts and indicators were chosen based on Project team experience with mine rock stockpiles and assessments of alternatives for other mining projects. The Project Team included both Atlantic staff and their consultants. During the preparation of the report, consultation with Indigenous communities was undertaken and feedback / input was sought to inform the report. This included the alternatives, accounts, subaccounts, indicators, measurement parameters and weightings.

A complete list of sub-accounts and indicators used to develop the multiple accounts ledger, including the rationale for their selection, is provided in Table 5.

Sub-accounts and indicators were chosen such that they would allow for a clear differentiation between the alternative locations. During characterization of the alternatives, it was noted that several indicators revealed little, or no, meaningful differences, between the alternatives. Therefore, in the interests of analyzing the alternatives relative to each other, and as per the Guidelines, these sub-accounts and indicators were removed from the MAA. Sub-accounts and indicators removed from the MAA include:

- **Environment, Terrestrial Resources Loss of Interior Forest:** This indicator was removed as it is not expected to have any real difference in effects amongst the alternatives.
- Environment, Terrestrial Resources Loss of Old Forest: This indicator was removed as none of the alternatives are expected to impact old forest.
- Environment, Sensitive Species Loss of Common Nighthawk Habitat: This indicator was removed as none of the alternatives are expected to impact habitat for Common Nighthawk.
- Environment, Sensitive Species Loss of Canada Warbler Habitat: This indicator was removed as there is insufficient data to assess all alternatives considered.
- **Environment, Terrestrial Resources Number of SAR:** This indicator was removed as there is insufficient data to assess all alternatives considered.
- **Technical, Expansion Capacity Ease of Obtaining Permits:** Removed as it was considered under the Maximum Expansion Capacity indicator.
- Socioeconomic, Indigenous Land Use and Heritage Value Loss of Access for Traditional **Purposes:** This indicator was removed as the parameters used in characterizing the indicator were considered through the loss of ATV trails.



- Socioeconomic, Indigenous Land Use and Heritage Value Loss of Traditional Harvesting: This sub-account has been removed as no specific information relating to traditional use has been identified for the alternative locations.
- Socioeconomic, Indigenous Land Use and Heritage Value Distance from Indigenous Sensitive Areas: This sub-account has been removed as no specific no Indigenous sensitive areas have been identified near the alternatives.
- **Socioeconomic, Non-Indigenous Land Use Loss of Hunting:** This indicator was removed as no specific information relating to traditional use has been identified for the alternative locations.
- Socioeconomic, Non-Indigenous Land Use Loss of Trapping: This indicator was removed as there is insufficient data and/or specific trapping activity near all alternatives available to evaluate the alternatives considered.
- Socioeconomic, Human Health and Public Safety Loss of Public Infrastructure: This indicator was removed as the parameters used in characterizing the indicator were considered through the hazard potential to the public indicator.
- Socioeconomic, Human Health and Public Safety Interference with Public Traffic: Removed as only one alternative is expected to impact public traffic.
- Socioeconomic, Archeological / Cultural Sites Areas of Archeological potential: This subaccount has been removed as no specific archaeological or cultural sites, including associated trails, travel routes and habitation sites, have been identified near the alternatives.
- Socioeconomic, Local Economic Risk Loss of Local Jobs: This indicator was removed as the parameters used in characterizing the indicator were considered with the loss of business opportunities.

8.2 Valuating Criteria

Criteria used to calculate indicator values for each of the indicators in the multiple accounts ledger are provided in Table 6.



9.0 VALUE BASED DECISION PROCESS

9.1 Valuating

A multiple accounts ledger was developed for the seven alternatives considered through the MAA. Using the alternatives characterization (Table 4) and valuation criteria (Table 6), values have been determined for all indicators, which are presented in Table 7.

9.2 Weighting

In accordance with the Guidelines (Environment Canada 2013), weights have been applied to each account, sub-account and indicator, to reflect the relative importance of the criteria. The base case scenario uses the following weights established in the Guidelines for the primary accounts:

- Environmental (6);
- Technical (3);
- Project Economics (1.5); and
- Socio-Economic (3).

Overall, the Environmental account is weighted twice as important as the Technical and Socio-Economic accounts, which in turn are twice as important as the Project Economics account.

Weights for sub-accounts and indicators are presented in Table 8. As noted in Section 8.1, these weights were selected by a team of internal experts with experience related to the various accounts and disciplines. Where applicable, consideration was given to include the results of consultation with Indigenous groups and other stakeholders. Although subjective by nature, Atlantic believes the weights selected reflect the relative importance between the various criteria taking into account both technical experience and consultation efforts, and rationale for each weight is provided in Table 8.

9.3 Quantitative Analysis – Base Case

9.3.1 Indicators

Using the values and weights provided in Tables 7 and 8, respectively, the MAA was conducted for the base case scenario. The analysis of Environmental, Technical, Project Economics and Socio-economic indicators, and calculation of sub-account merit ratings is provided in Tables 9, 10, 11 and 12, respectively.

9.3.2 Sub-Accounts

The analysis of Environmental, Technical, Project Economics, and Socio-economic sub-accounts, and calculation of account merit ratings, is provided in Tables 13, 14, 15 and 16, respectively.

From an environmental perspective, Alternative G is the preferred alternative with an account merit rating of 5.2 out of a maximum of 6.0. Alternative D and E were the next preferred with both receiving an account merit rating of 4.8.



For the technical account, Alternative B is clearly the preferred alternative with an account merit rating of 4.5. Alternative F, the next most viable alternative received an account merit rating of 3.8.

From a Project Economics perspective, Alternative D is the preferred alternative, with an account merit rating of 4.4. Alternative B was the next most viable alternative from an economic perspective with an account merit rating of 4.3.

From a Socio-economics perspective, Alternatives A and B were the preferred alternatives with an account merit rating of 4.2. Alternative C and G were the next most viable alternatives with an account merit rating of 3.9 out of 6.0.

9.3.3 Base Case Results

Overall results of the MAA base case scenario, and calculation of alternative merit ratings, are provided in Table 17. The results are summarized as follows:

- The MAA found that Alternative B is the overall preferred alternative with an alternative merit rating of 4.4 out of a maximum of 6.0.
- Alternative G was the next most viable, with an alternative merit rating of 4.3.
- Alternative D received an alternative merit rating of 4.2, Alternative A received an alternative merit rating of 4.1, Alternative E received an alternative merit rating of 3.8 and both Alternative C and F received an alternative merit rating of 3.6.



10.0 SENSITIVITY ANALYSIS

Sensitivity analyses were carried out to evaluate the robustness of the analytical process, to manage bias and subjectivity, and to determine the degree to which various options are influenced by the choice of weightings.

Four scenarios were given consideration, in addition to the base case:

- Scenario 1: Base case;
- Scenario 2: All accounts weighted equally;
- Scenario 3: All accounts, sub-accounts and indicators weighted equally;
- Scenario 4: Prioritize people, environment strongly considered (Socio-economics account weighted six, environmental account weighted four, technical account weighted two, project economics weighted one); and
- Scenario 5: Prioritize water (weight of all criteria related to water received a maximum weight).

The results of the sensitivity analyses are documented in Table 18. Quantitative analysis tables for the sensitivity analyses can be found in Appendix A. The sensitivity analyses found that the results of the MAA is robust and not sensitive to change. For all scenarios, the relative order of preference did not change from the base case results and Alternative B remained preferred in all cases.



11.0 CONCLUSION

Using the MAA methodology, the preferred alternative for the mine waste disposal for the Fifteen Mile Stream Gold Project is Alternative B with an alternative merit rating of 4.4 out of a maximum of 6.0. The runner-up alternative (Alternative G) has an alternative merit rating of 4.3. Alternative D has an alternative merit rating of 4.2. Alternative A has an alternative merit rating of 4.1, Alternative E has an alternative merit rating of 3.8, and Alternative C and F both have an alternative merit rating of 3.6. Alternative B, the preferred alternative is shown in Figure 15.

A sensitivity analysis comprised of four additional scenarios was carried out to evaluate the robustness of the analytical process and to determine the degree to which various options are influenced by the choice of weightings. The sensitivity analysis found that the Multiple Accounts Analysis is robust and not sensitive to change. For all scenarios, Alternative B remained the preferred alternative however the order of preference tended towards Alternative A then Alternative G compared to the base case results.



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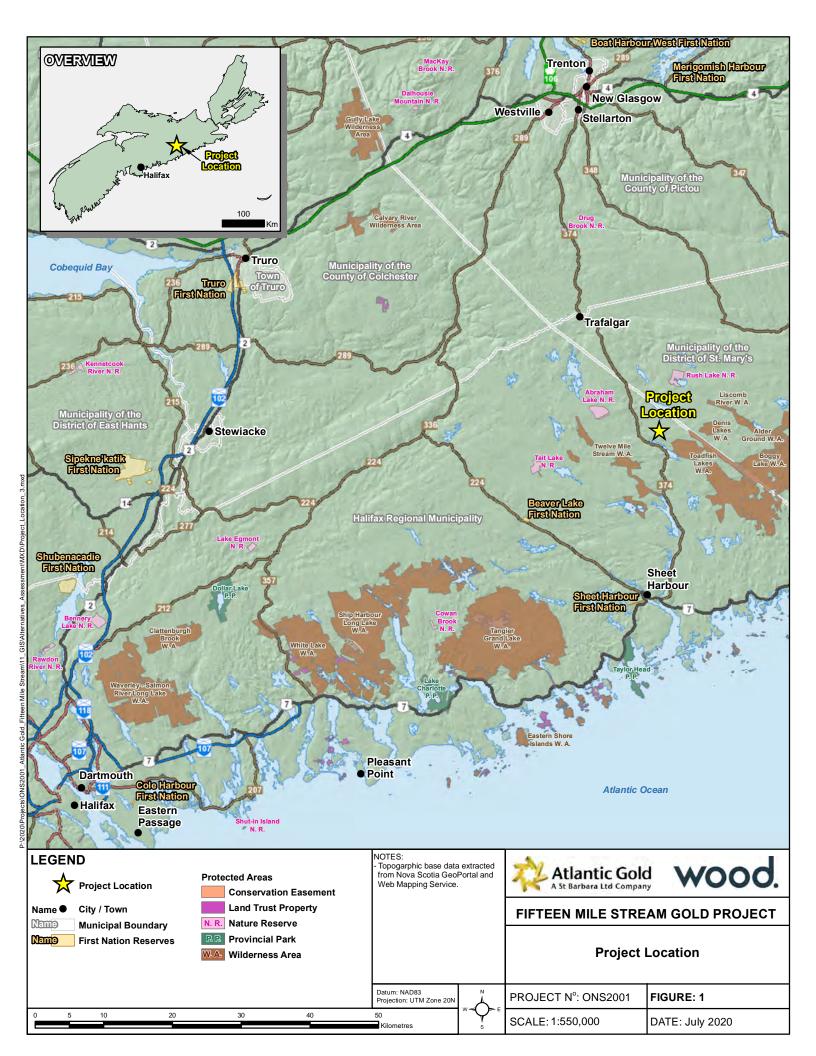
13.0 CLOSING

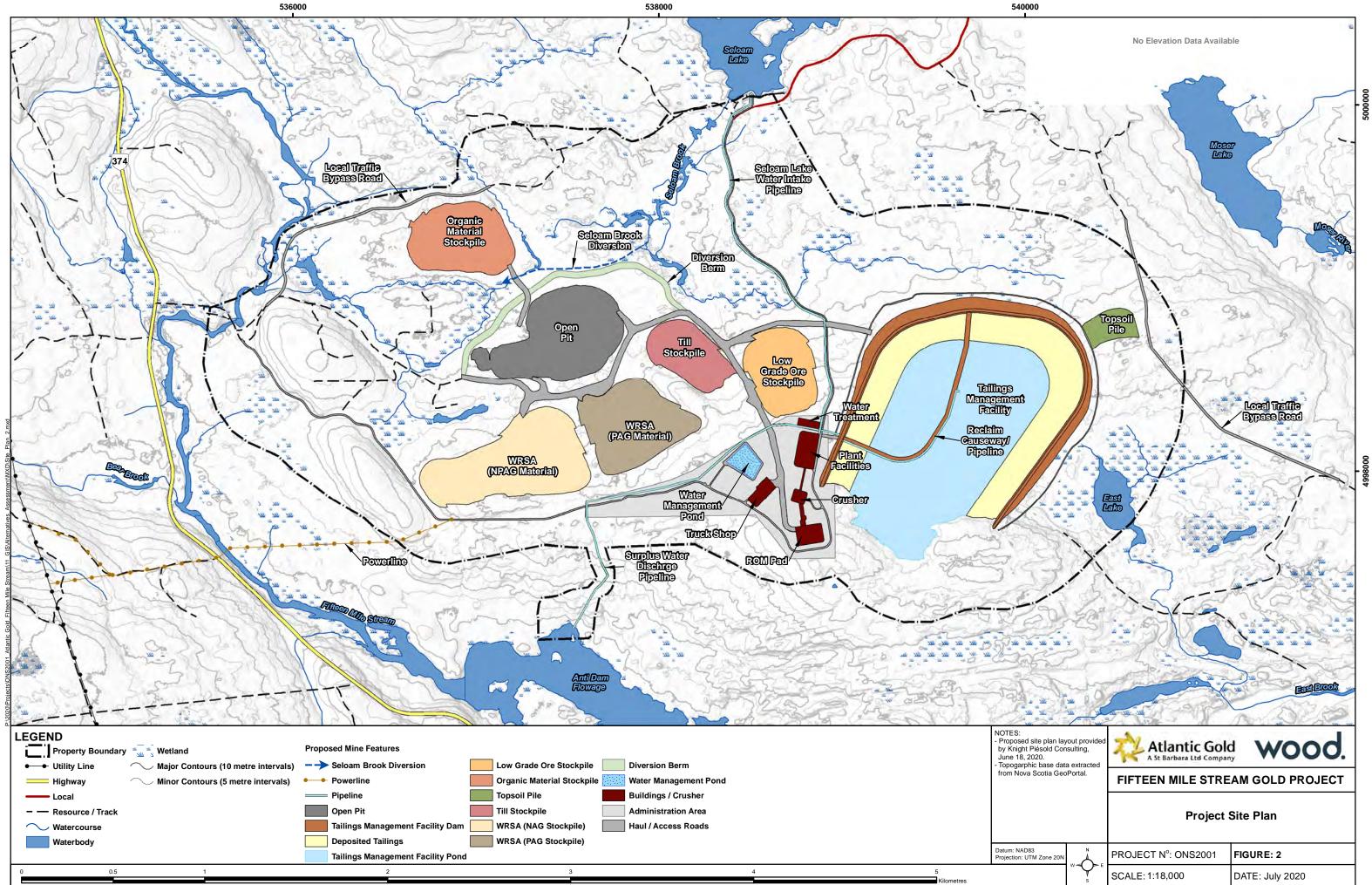
This Assessment of Alternatives for Storage of Mine Waste has been prepared by Wood for the sole benefit of Atlantic for specific application to the Fifteen Mile Stream Gold Project. The quality of information, conclusions and estimates contained herein are consistent with the level of effort involved in Wood's services and based on: i) information available at the time of preparation, and ii) the assumptions, conditions and qualifications set forth in this document. This report is intended to be used by Atlantic and its nominated representatives only, subject to the terms and conditions of its contract with Wood. Any other use of, or reliance on, this report by any third party is at that party's sole risk. This report has been prepared in accordance with generally accepted industry-standard practices. No other warranty, expressed or implied, is made.

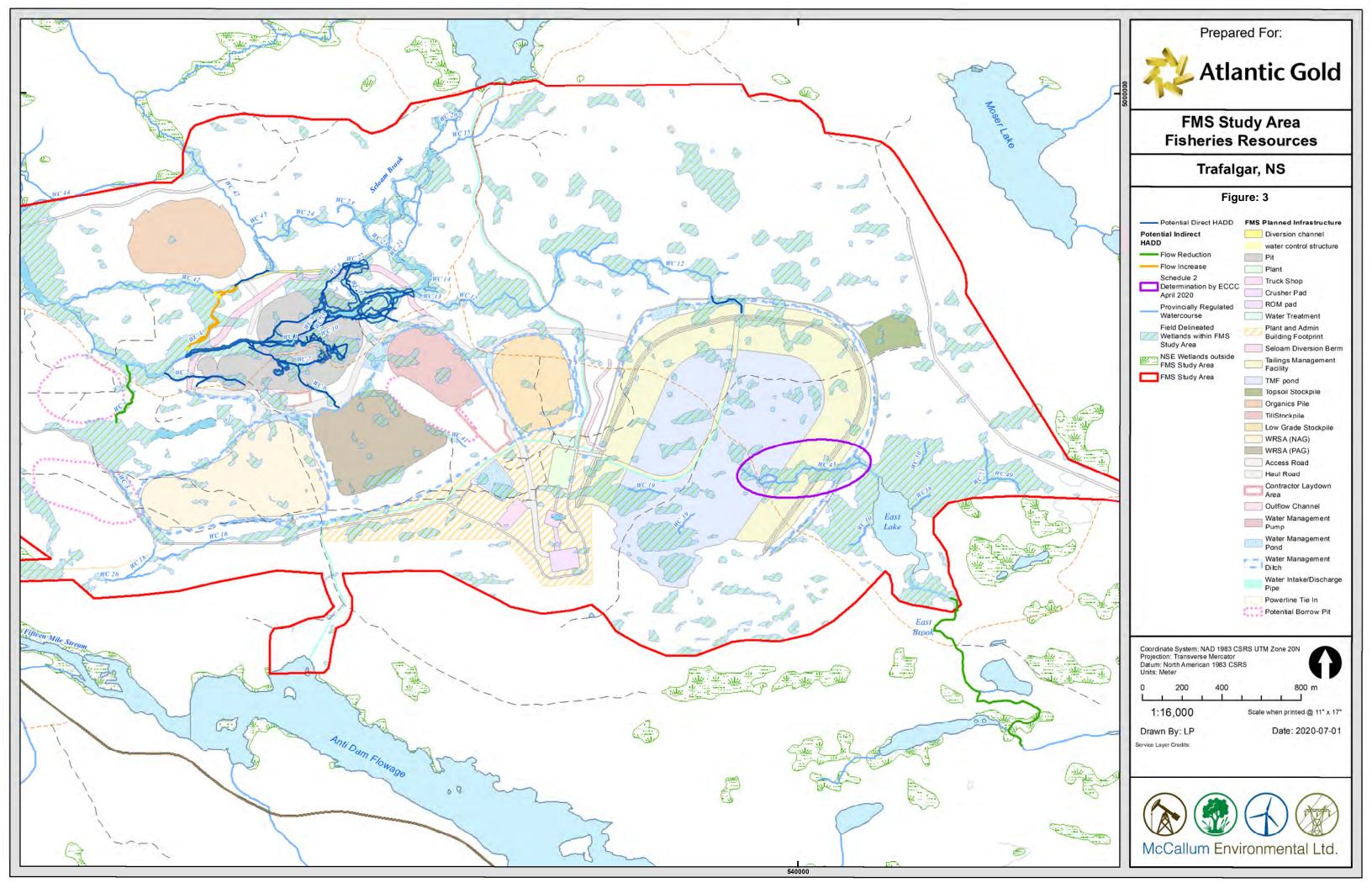
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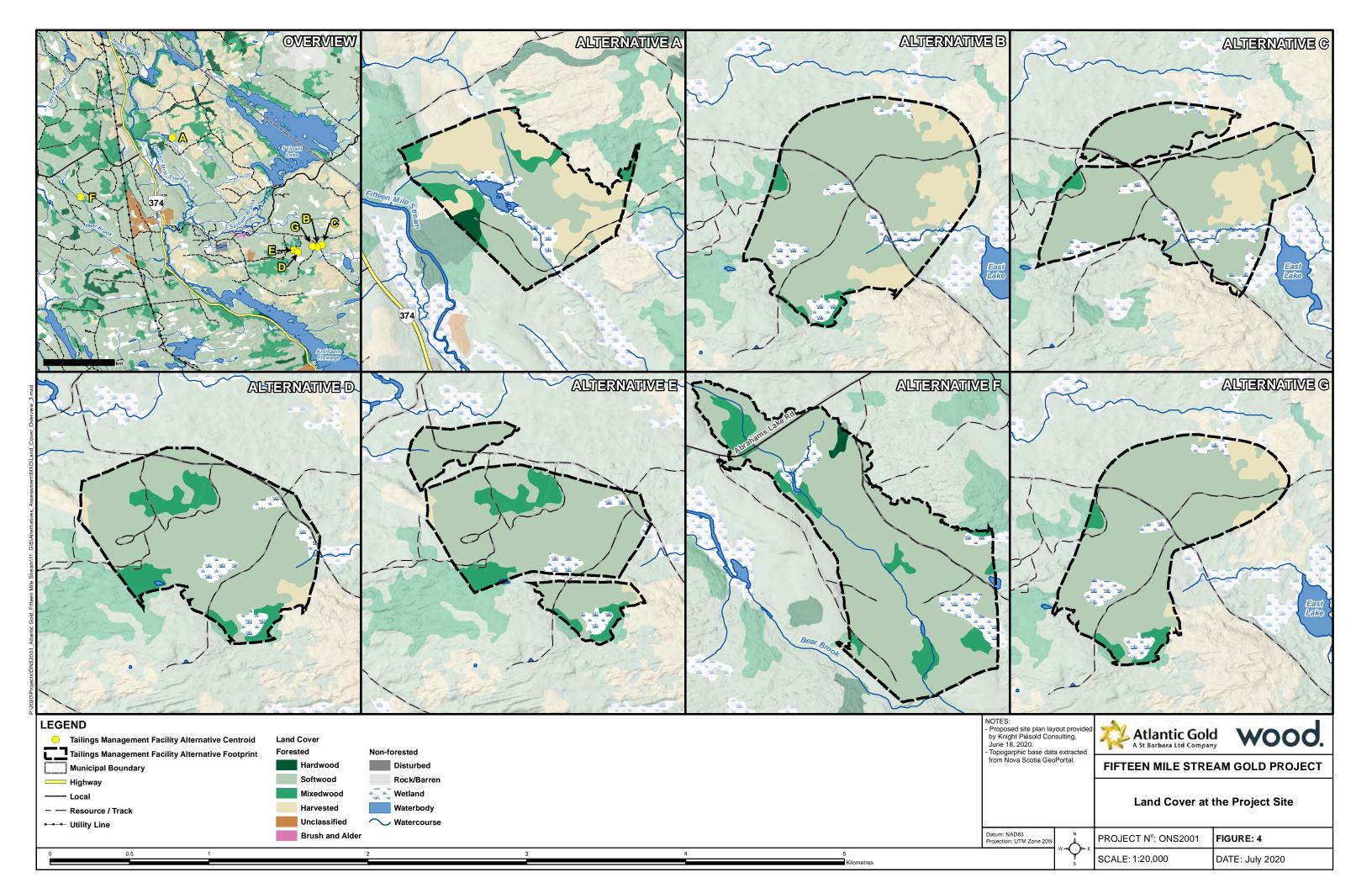
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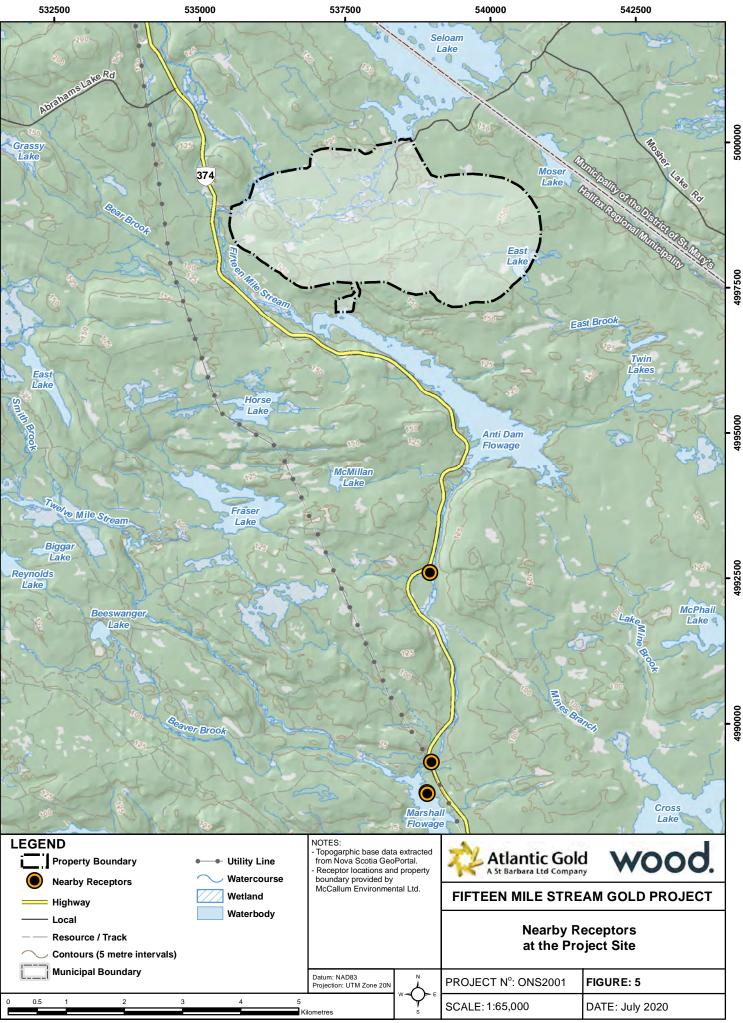
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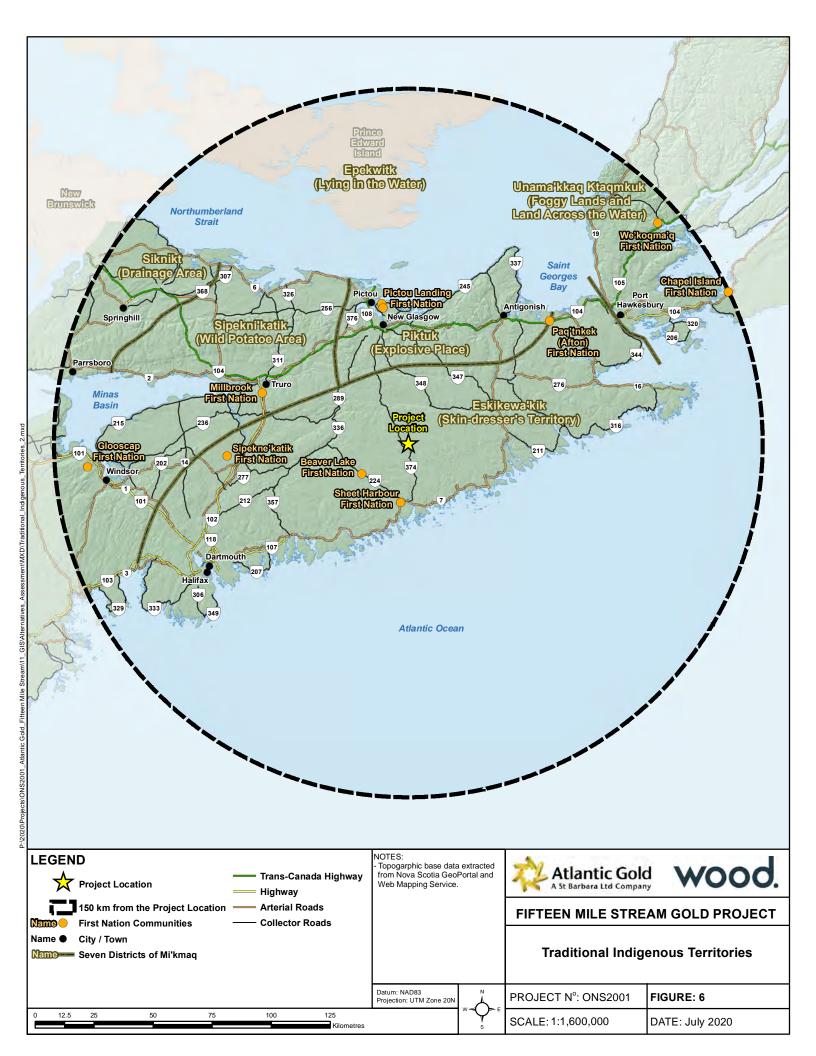


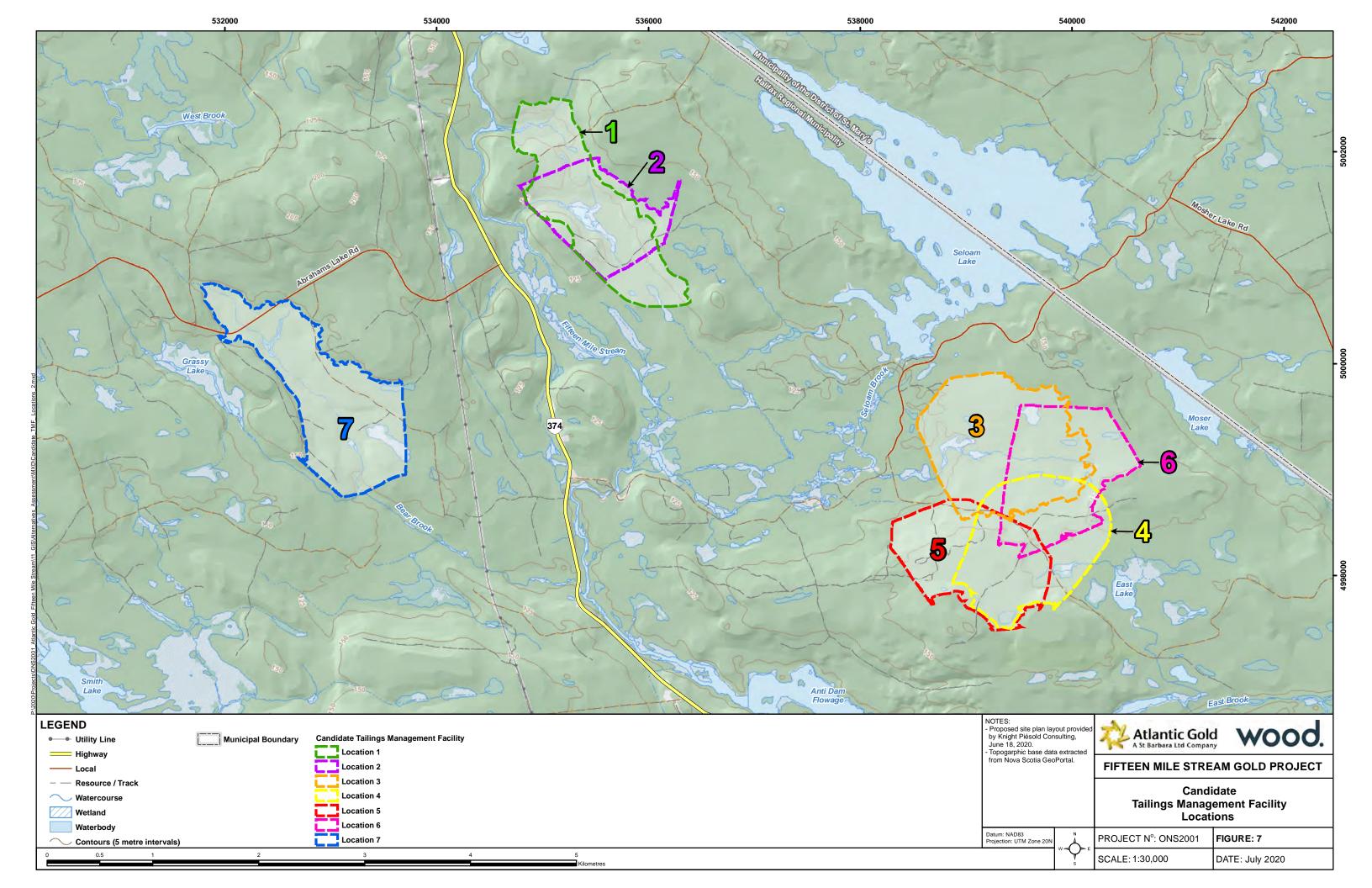


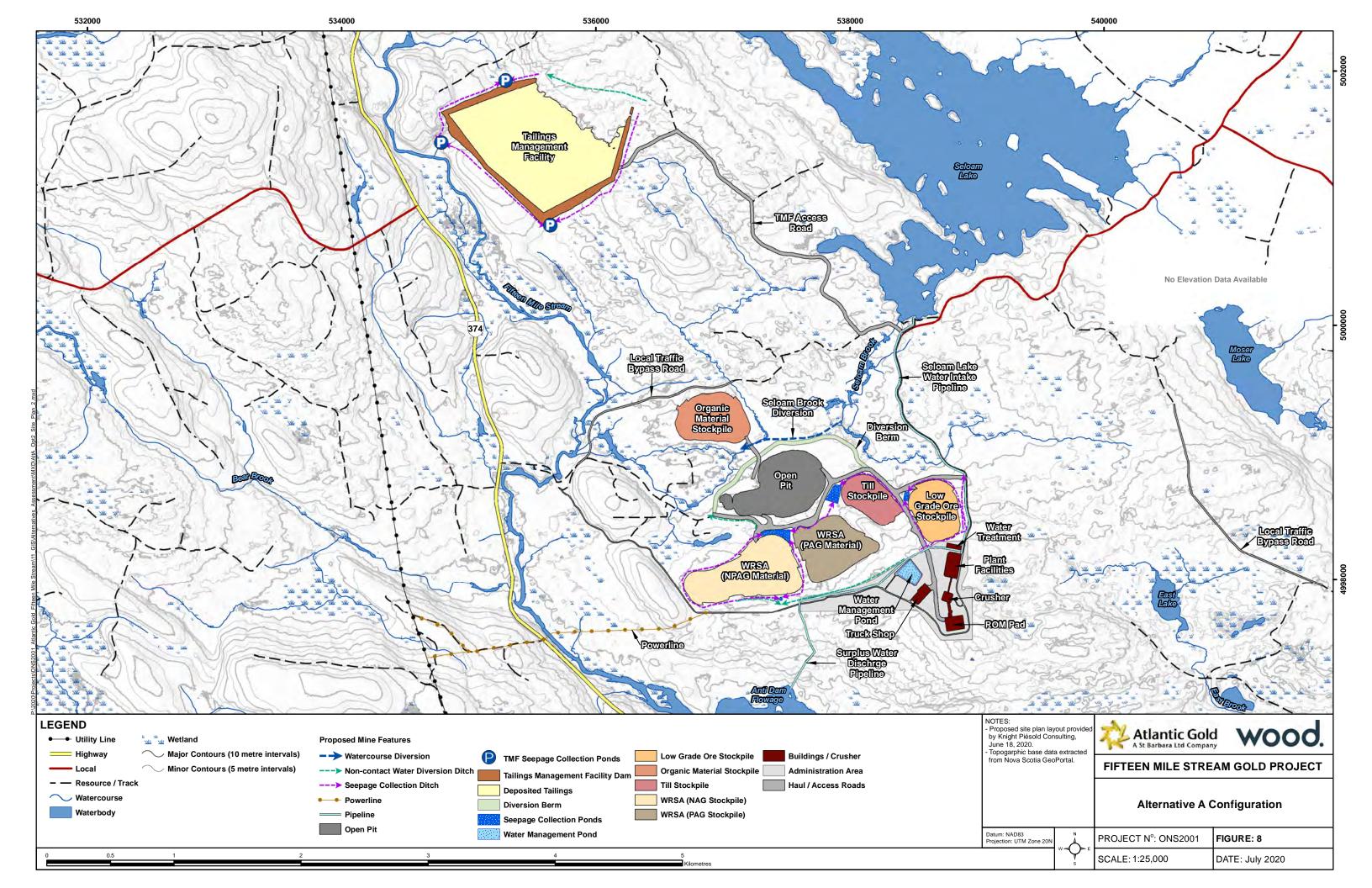


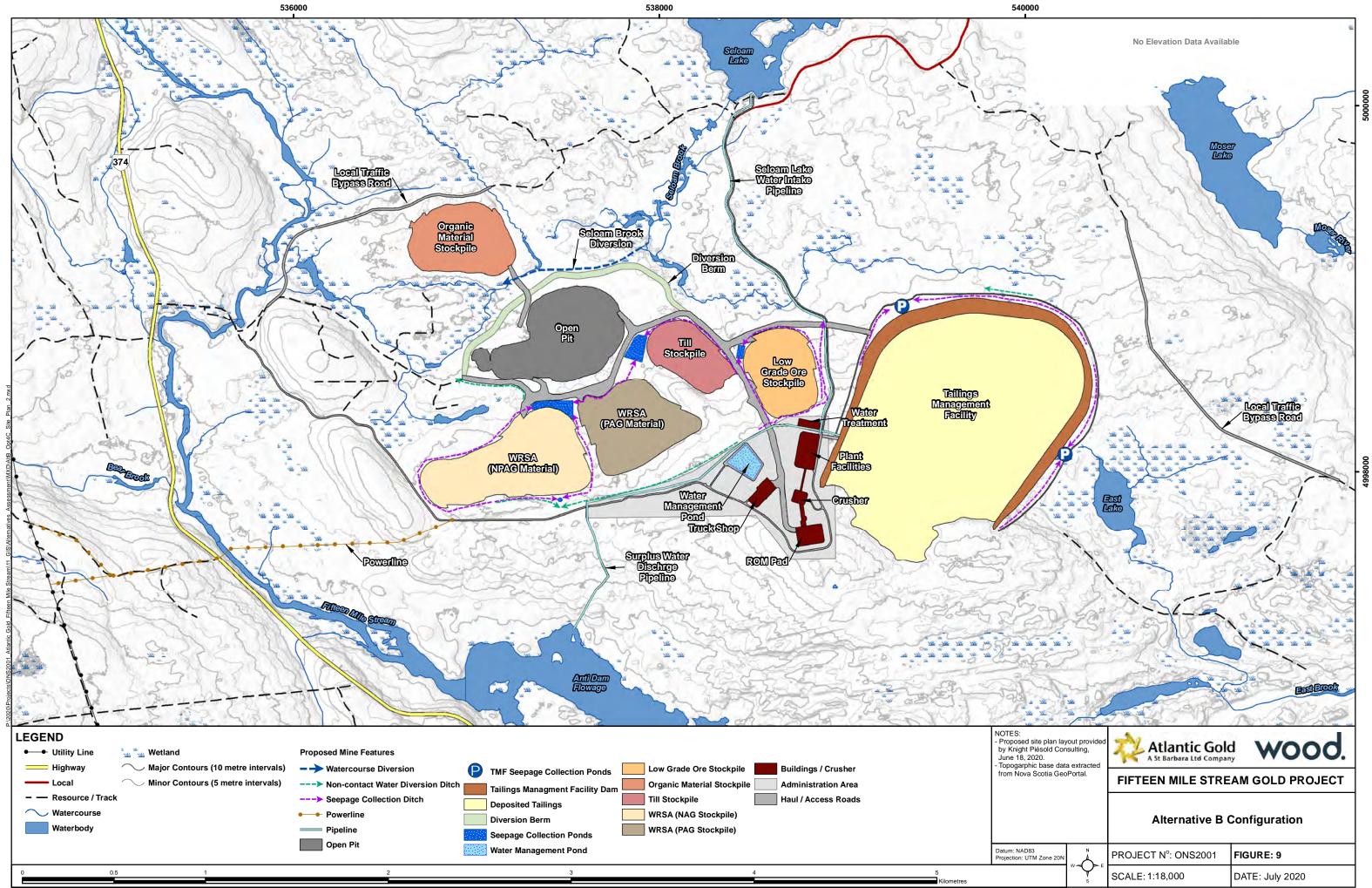


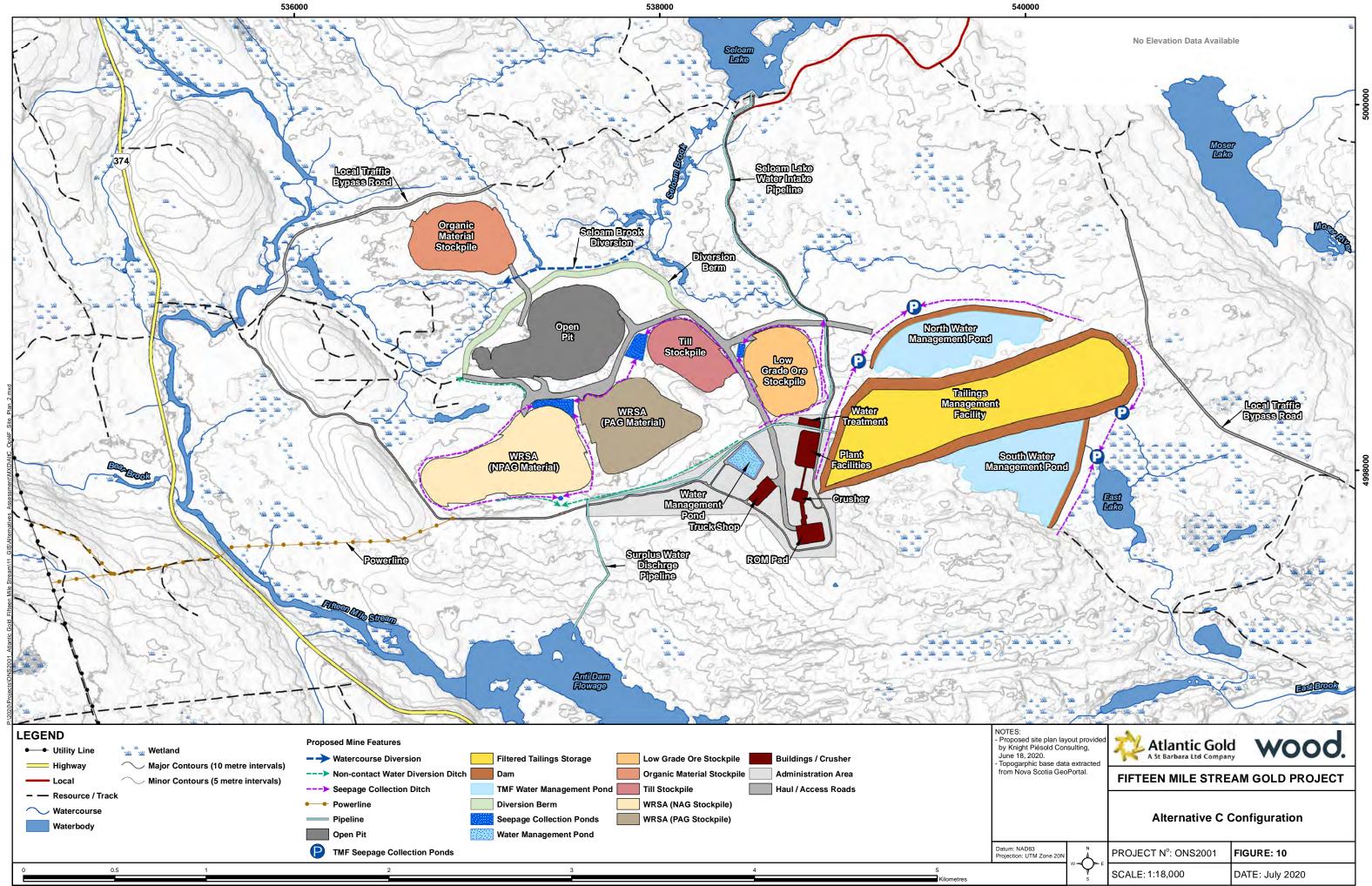


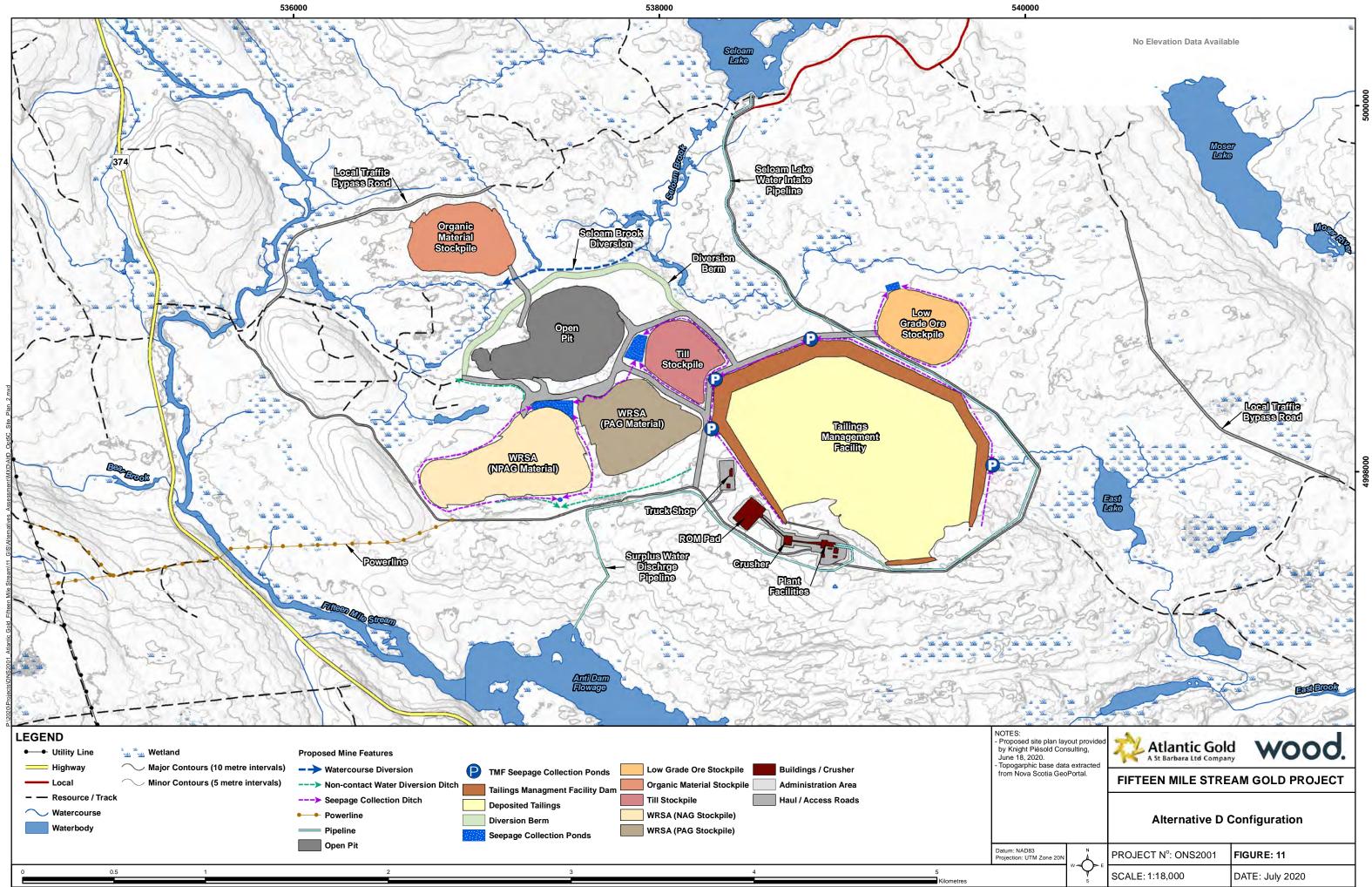


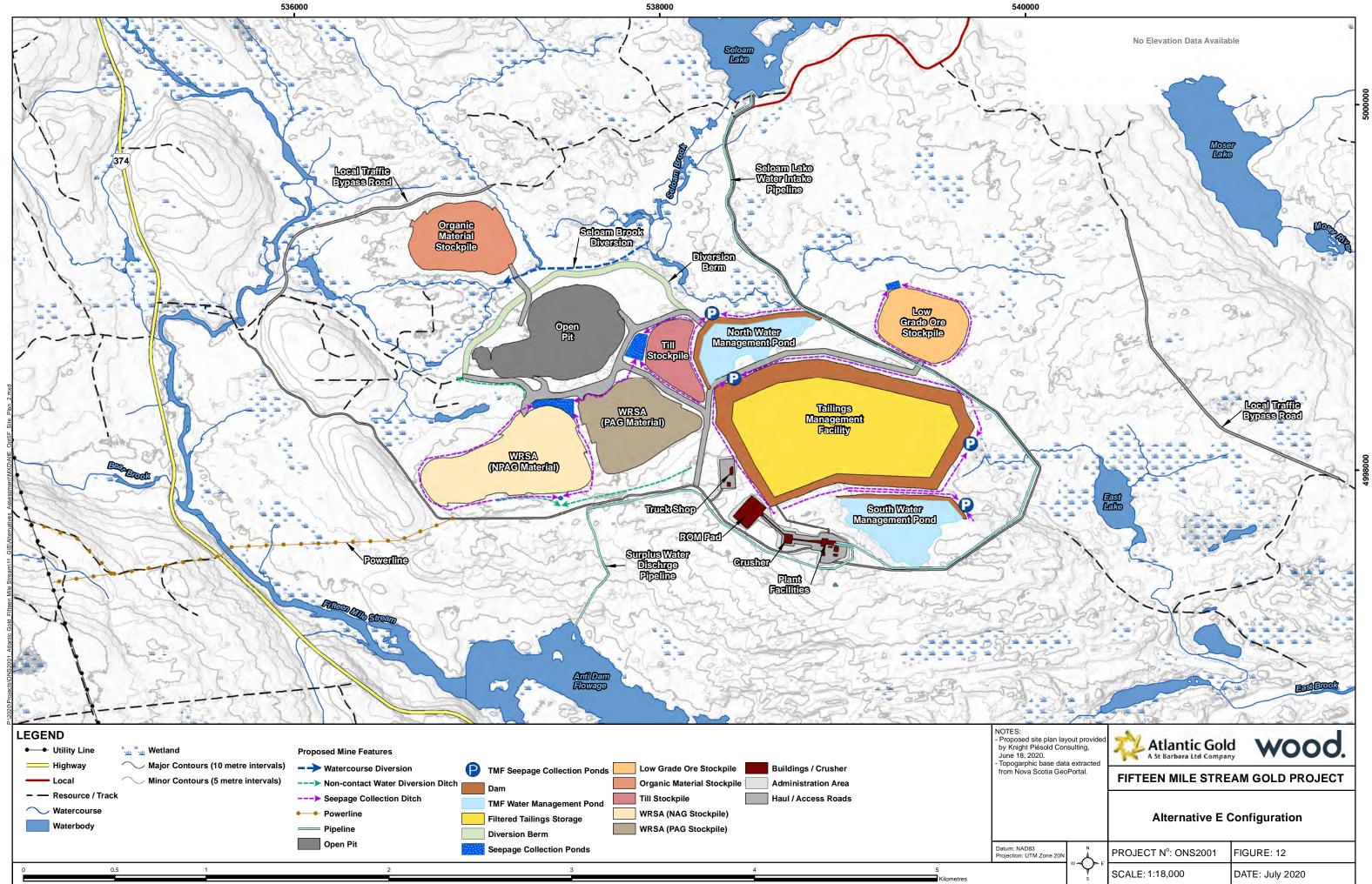


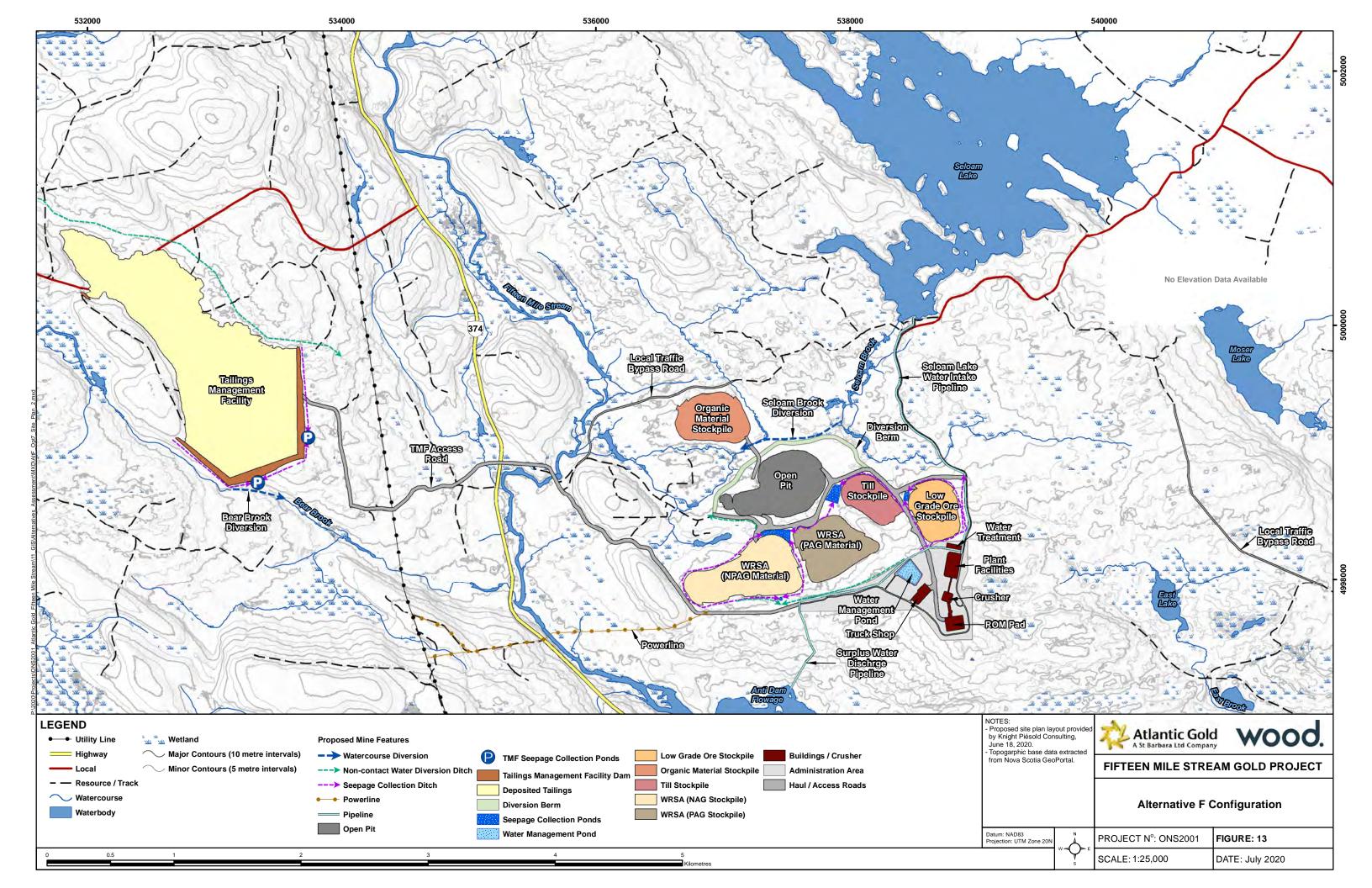


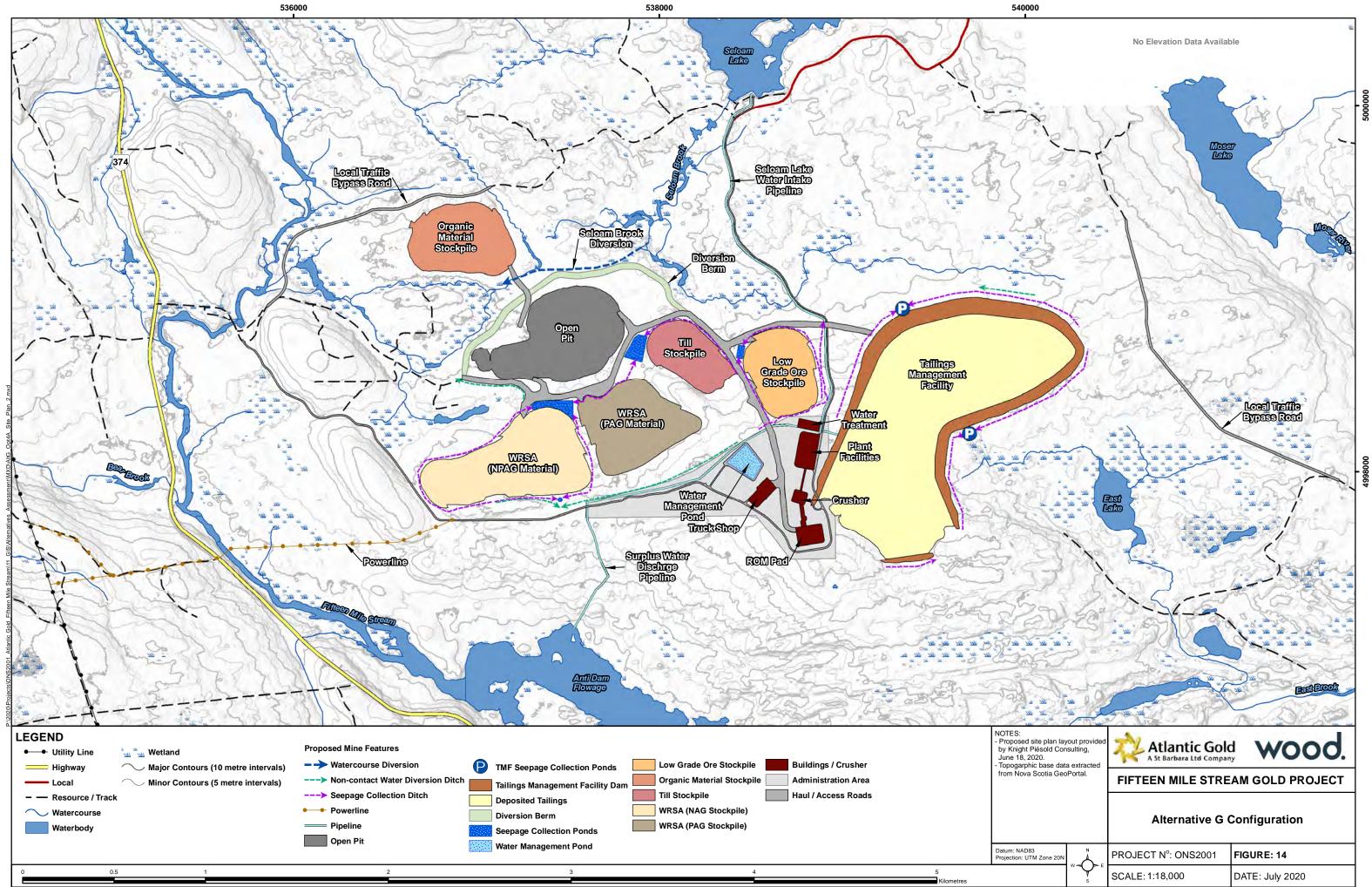


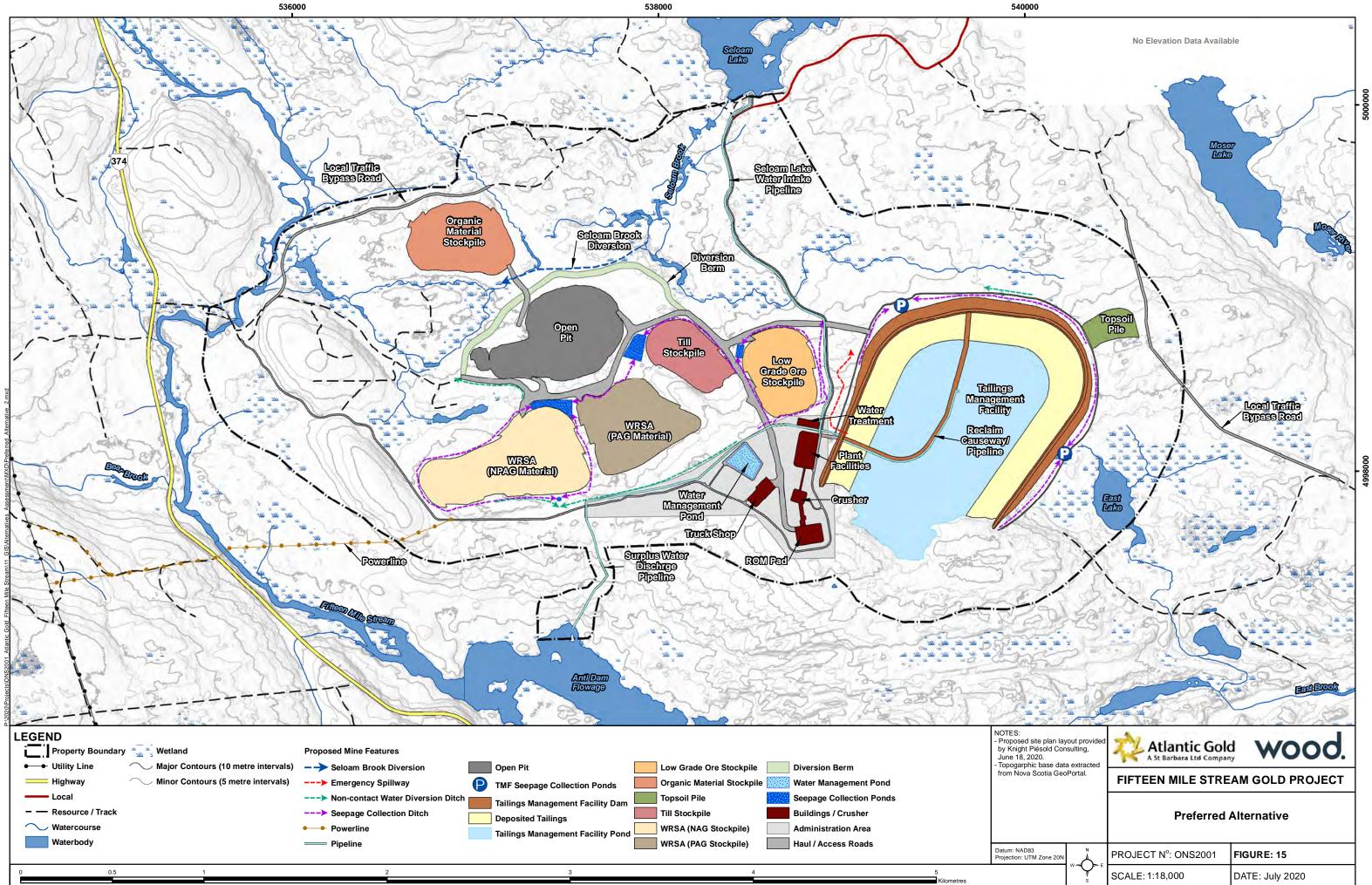














		S	torage	Metho	ds Can	didate	s
Pre-Screening Criteria	Rationale	Conventional Slurry	Thickened Tailings	Paste Tailings	Filtered Tailings	Cycloned Tailings	Co-Disposal
Does the alternative method confer a substantial benefit over conventional technologies?	The disposal method must offer significant advantages, without significant offsetting drawbacks, over the use of conventional slurry tailings for the conditions of the Project.	Yes	No	No	Yes	No	NA
Does the alternative allow for disposal of a sufficient quantity of tailings?	Alternatives that can only manage a portion of the tailings generated are insufficient and will require other alternatives to be employed to meet Project needs.	Yes	Yes	Yes	Yes	Yes	No
	Candidate forward to Alternatives Assessment?	Yes	No	No	Yes	No	No

Table 1: Storage Method Pre-Screening Assessment Summary Table



			Sto	rage Loo	cation C	andidat	es	
Pre-Screening Criteria	Rationale	Alternative #1	Alternative #2	Alternative #3	Alternative #4	Alternative #5	Alternative #6	Alternative #7
Does the alternative location stay within the main watershed (and avoid overprinting a major watershed divide)?	Alternatives that are located within a single watershed will minimize the risk for a greater distribution of potentially affected runoff from the TMF and reduce water management requirements.	Yes	Yes	Yes	Yes	Yes	No	Yes
Is the alternative location within Atlantic property boundary, or on lands which could be readily acquire?	Alternatives that are located off the property boundary will require Atlantic to acquire additional surface and mineral rights. This is expected to be difficult to achieve and will result in unacceptable Project delays.	No	Yes	No	Yes	Yes	Yes	Yes
	Candidate forward to Alternatives Assessment?	No	Yes	No	Yes	Yes	No	Yes

Table 2: Storage Location Pre-Screening Assessment Summary Table



 Table 3: Storage Method and Location Advantages and Disadvantages

Candidate Alternative	Advantages	Dis
	Storage Methods	
Conventional Slurry Tailings	 Conventional technology that is regularly used in Nova Scotia Less dust emissions than filtered / thickened tailings Lower costs than filtered tailings and thickened tailings Tailings can be transported via pipeline 	 More water 'lost' to void spaces I tailings (this may be an advantag Mine Stream Project currently ha Extensive dams may be required Deposition scheduling depender
Thickened Tailings	 Tailings could be deposited on a slope, slightly lowering the height of dams, depending on topography Improved water recycle (this may be a disadvantage from a technical perspective due to the current excess of water in the Fifteen Mine Stream Project inventory) Tailings can be transported via pipeline Reduction in water storage / retaining pond volume Reduced risk of environmental damage in the event of a dam breach (less water to aid in the transport of tailings downstream) Reduced seepage rates 	 Enhanced thickening systems are Greater dust emissions than from Steeper tailings slopes are more vegetate at closure Extensive dams may be required Deposition scheduling depender Does not noticeably reduce footy Does not eliminate the need for a Higher capital costs than convent pumps for paste tailings may be High operating costs with respect Risk of not achieving desired contore type, inconsistent feed Over-estimating beach slope and construction schedules where fut prevent loss of freeboard If not deposited in relatively thin desiccation and strength gain in greater risk of ice inclusion in the life of the facility progresses
Paste Tailings	 Water storage and retaining ponds can be reduced or even eliminated. Higher beach slope angles can reduce the footprint of the facility while storing the same volume of material. As there is little water, there is a reduced risk of environmental damage if an embankment breach occurs. Reduced seepage from the stored paste tailings. 	 Expensive positive displacement discharge High operating costs associated paste compared to other method Requires high levels of operation Not proven at scale
Filtered Tailings	 Maximum water recycle (this may be a disadvantage from a technical perspective due to predicted excess water inventory for the Fifteen Mine Stream Project) No requirement for starter dam / deposition can begin immediately Tailings can be deposited in stockpiles No starter dam scheduling restrictions Smaller footprint than conventional slurry TMF 	 Filtration systems are very costly Dust generation from the filtered difficult or impossible to acquire Tailings must be transported by t Technology is not typically used permafrost, intense water recycle Runoff capture systems would be

Disadvantages

s between tailings than in filtered / thickened age from a technical perspective as the Fifteen has an excess of water in its inventory)

ent on dam raises

are costly to construct and operate om conventional slurry deposition re prone to erosion and are more difficult to re-

ed

ent on dam raises

otprint of TMF compared to conventional slurry or a tailings pond located over tailings entional tailings disposal (positive displacement be required, possible water treatment plant) ect to thickening and transport

onsistency from thickeners due to variability in

ngle in design can result in complications in future raises have to be brought forward to

in layers (~0.3 m), may be difficult to allow for in net precipitation environments and therefore he winter and loss of storage capacity as the

nt pumps are usually required for paste tailings

d with the thickening and transportation of ods.

onal invention to maintain consistent output.

ly to operate

ed tailings could make regulatory approvals re

y truck or conveyer

d in Nova Scotia (too warm to encapsulate in cle is typically only used for arid environments,) be required





Candidate Alternative	Advantages	Disadvantages
	No requirement for a tailings pond positioned over tailings	 Large holding pond required near plant site Water treatment plant required
Cycloned Tailings	 Uses tailings as a dam construction material Smaller volume of tailings fines to be stored Less haul traffic to construct dams Lower cost dam construction method 	 Extensive dams may be required Does not noticeably reduce footprint of the TMF compared to conventional slurry Does not eliminate the need for tailings pond located over tailings Increased dust emissions Challenging water management Challenging winter deposition Anticipated negative public perception of dams constructed of tailings
Co-disposal of Mine Waste	 The strength and rapid stabilization of the co-disposal waste allows early access onto the tailings for rehabilitation Does not generally require retention embankments which thus eliminates the risk of embankment breach and transportation of tailings outside the storage zone Can significantly reduce the generation of acid associated with sulphide bearing coarse mine waste, as the tailings are much less pervious to water and atmospheric oxygen than coarse mine waste 	• Controlling the deposition strategy to optimize the blending of the coarse and fine waste feeds. This is only really economic where the two feeds can be pumped together or blended for in-pit storage
Open Pit Disposal	 Minimal environmental and socio-economic effects / no loss of undisturbed habitat / compact site footprint Existing open pit provides excellent containment and avoids the need for impoundment dams No requirement for starter dams / deposition can begin immediately 	 Seasonally limited (deposition not possible during winter months) Unable to store tailings until late in the project life; a surface impound would be required in tandem with this option
	Storage Locations	
Location #1	 Shorter dam heights Located within an area that provides good topographic containment 	 Located outside a 7 km distance from the open pit Located on lands owned by others and may not be obtained by Atlantic Will overprint an intermittent watercourse Overprints waters frequented by fish / MDMER Schedule 2 considerations Very far from ore processing plant Limited geotechnical information for this location No engineering design is well advanced Located within more than one watershed Requires a long distance to transport tailings
Location #2	 Located within a 7 km distance from the open pit Located within one watershed Located within an area that provides good topographic containment 	 Located on lands owned by others and may not be obtained by Atlantic Overprints waters frequented by fish / MDMER Schedule 2 considerations Very far from ore processing plant Limited geotechnical information for this location No engineering design is well advanced Requires a long distance to transport tailings





Candidate Alternative	Advantages	Dis
Location #3	 Close to processing plant Requires a relatively short distance to transport tailings 	 Will overprint an intermittent wa Overprints waters frequented by Limited geotechnical information No engineering design is well ac Located within more than one was
Location #4	 Located within a 7 km distance from the open pit Close to processing plant Engineering design is well advanced; this location is proposed in the EIS process and in community engagement, which reduces duplication of engineering design and reduces risk of delays in the environmental assessment process. Requires moderately short dam heights 	 Will overprint an intermittent wa Overprints waters frequented by Located within more than one w
Location #5	 Located within a 7 km distance from the open pit TMF footprint does not overprint natural waters frequented by fish Close to processing plant Requires a relatively short distance to transport tailings 	 No engineering design is well ac Located within more than one w Requires high dam heights
Location #6	 Located within a 7 km distance from the open pit Requires a relatively short distance to transport tailings 	 Overlaps a major watershed divi Will overprint an intermittent wa Overprints waters frequented by Limited geotechnical information No engineering design is well ac Located within more than one w
Location #7	 Located within a 7 km distance from the open pit Located within one watershed Located within an area that provides good topographic containment 	 Will overprint an intermittent wa Overprints waters frequented by Very far from ore processing pla Requires haul roads, tailings pipe Large length of road where mine Limited geotechnical information No engineering design is well ac Requires a long distance to trans

oisadvantages

watercourse

by fish / MDMER Schedule 2 considerations tion for this location advanced watershed

watercourse

by fish / MDMER Schedule 2 considerations e watershed

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tion for this location

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watercourse

by fish / MDMER Schedule 2 considerations plant

bipelines and reclaim lines to cross Highway 374 nine haul traffic would interact with public traffic tion for this location

advanced

ansport tailings



Table 4: Alternatives Characterization

Account	Sub-Account	Indicator	Parameter	Unit	Alternative A	Alternative B	Alternative C	Alternative D	Alternative E	Alternative F	Alternative G
Environment	Water Quality	Water Treatment	Qualitative scale	_	Water storage	Water storage	Water storage	Water storage	Water storage	Water storage	Water storage
		Requirements			volume of 1.6	volume of 1.6	volume of 1.48	volume of 1.6	volume of 1.38	volume of 1.6	volume of 1.6
					Mm ³ in, with 4	Mm ³ , with 3	Mm ³ in, with 6	Mm ³ in, with 5	Mm ³ in, with 6	Mm ³ in, with 3	Mm ³ in, with 3
					water	water	water	water	water	water	water
					managements	managements	managements	managements	managements	managements	managements
					ponds and a	ponds and a	ponds and a	ponds and a	ponds and a	ponds and a	ponds and a
					moderate	large receiving	large receiving	large receiving	large receiving	small receiving	large receiving
					receiving	waterbody	waterbody	waterbody	waterbody	waterbody	waterbody
					waterbody (Bear	(Anti-Dam	(Anti-Dam	(Anti-Dam	(Anti-Dam	(tributary to	(Anti-Dam
					Brook).	Flowage).	Flowage).	Flowage).	Flowage).	Seloam Lake).	Flowage).
		Flexibility for Water	Number of water	#	4	3	6	5	6	3	3
		Treatment and Recycle	management ponds		(TMF	(TMF	(2 water	(TMF	(2 water	(TMF	(TMF
					Supernatant	Supernatant	management	Supernatant	management	Supernatant	Supernatant
					Pond + 3	Pond + 2	ponds + 4	Pond + 4	ponds + 4	Pond + 2	Pond + 2
					seepage ponds)	seepage ponds)	seepage ponds)	seepage ponds)	seepage ponds)	seepage ponds)	seepage ponds)
	Hydrology	Catchment Impacted	Length of stream where loss is over 25%	m	220	5136	4990	2983	2757	1975	4280
		Number of Affected Sub- watersheds	Number of sub-watersheds	#	1	2	2	3	3	1	2
	Aquatic Resources	Loss of Fish Habitat (waterbody)	Area of waterbody	ha	2.1	0	0	0.1	0.1	0.4	0
		Loss of Fish Habitat (watercourse)	Length of watercourse	m	1445	683	831	205	122	3687	0
		Number of new crossings	Number of crossings	#	3	0	0	0	0	2	0
	Terrestrial Resources	Loss of Wetland	Area of wetland	ha	6.3	12.1	11.3	7.5	5.7	9.5	7.1
		Use of Disturbed Habitat	Area of disturbed habitat	ha	1.2	4	3.5	5.1	3.9	4.2	3.3
		Footprint	Area	ha	90.2	142.8	122.7	122.8	111.6	158.2	112.7
	Sensitive Species	Loss of Mainland Moose Habitat	Area of potential habitat	ha	8.4	12.1	11.3	7.6	5.8	9.9	7.1
		Loss of Brook Trout Habitat	Length of watercourse	m	1445	683	831	205	122	3687	0
	Atmospheric	Fugitive Dust	Qualitative scale	_	Conventional	Conventional	Filtered tailings	Conventional	Filtered tailings	Conventional	Conventional
	Emissions				slurry tailings	slurry tailings	with a footprint	slurry tailings	with a footprint	slurry tailings	slurry tailings
	Enhosions				with a footprint	with a footprint	of 122 ha	with a footprint	of 111 ha	with a footprint	with a footprint
					of 90 ha located	of 142 ha	located 0.9 km	of 122 ha and	located 0.6 km	of 158 ha	of 112 ha
					4.6 km from the	located 0.8 km	from the	located 0.5 km	from processing	located 6.0 km	located 0.7 km
					processing	from the	processing	from the	facility	from processing	from the
					facility	processing	facility	processing		facility	processing
						facility		facility			facility
		GHG Emissions	Qualitative scale	_	Conventional	Conventional	Filtered tailings	Conventional	Conventional	Conventional	Conventional
					slurry tailings	slurry tailings	facility with a	slurry tailings	slurry tailings	slurry tailings	slurry tailings
					facility with a	facility with a	large area	facility with a	with a small	facility with a	facility with a
					small area	moderate area	required for	moderate area	area to be	moderate area	moderate area
					required for	required for	clearing, and	required for	cleared, with a	required for	required for
					clearing, and a	clearing, and a	large volume of	clearing, and	moderate	clearing, and	clearing, and
					small volume of	small volume of	dam	substantial	volume of dam	small volume of	substantial
					dam	dam	construction	volume of dam	construction	dam	volume of dam





Account	Sub-Account	Indicator	Parameter	Unit	Alternative A	Alternative B	Alternative C	Alternative D	Alternative E	Alternative F	Alternative G
Account	Sub-Account	maicator	i arameter	Onit	construction	construction	materials to be	construction	materials to	construction	construction
					materials	materials	hauled over a	materials	hauled over a	materials	materials
					hauled over a	hauled over a	short distance.	hauled over a	short distance.	hauled over a	hauled over a
					moderate	short distance.	Requires	short distance.	Requires	long distance	short distance
					distance.		hauling 40,000		hauling 40,000		
							truckloads of		truckloads of		
							filtered tailings		filtered tailings		
							throughout		throughout		
							operations		operations		
		Noise Emissions	Distance from TMF to	km	9.45	5.74	5.81	5.56	5.62	9.32	5.76
			receptor		5.45						
	Protected Areas	Proximity to Protected	Distance from TMF to	m	4501	1552	1528	1729	1840	2164	1647
		Areas	nearest protected area		(Abraham Lake	(Toadfish Lakes	(Toadfish Lakes	(Toadfish Lakes	(Toadfish Lakes	(Abraham Lake	(Toadfish Lakes
					Wilderness	Wilderness	Wilderness	Wilderness	Wilderness	Wilderness	Wilderness
					Area)	Area)	Area)	Area)	Area)	Area)	Area)
	Hazard Potential to	Magnitude of Failure	Qualitative scale		Conventional	Conventional	Filtered tailings	Conventional	Filtered tailings	Conventional	Conventional
	the Environment				slurry tailings	slurry tailings	facility with one	slurry tailings	facility with one	slurry tailings	slurry tailings
					facility with a	facility with a	downstream	facility with a	downstream	facility with a	facility with a
					dam height of	dam height of	water	dam height of	water	dam height of	dam height of
					29 m and dam	32 m and dam	management	40 m and dam	management	32 m and dam	36 m and dam
					length of 3,100	length of 3,100	pond, a dam	length of 3,600	pond, a 48 m	length of 2,050	length of 3,600
					m	m	height of 23 m	m	high dam and	m	m
							and dam length		length of 3,300		
							of 4,000 m		m		
		Downstream Sensitivities	Qualitative scale		Conventional	Conventional	Filtered tailings	Conventional	Filtered tailings	Conventional	Conventional
					slurry tailings	slurry tailings	with water	slurry tailings	with water	slurry tailings	slurry tailings
					located 0.2 km from Fifteen	located 3.55 km from Fifteen	management ponds located	located 2.87 km from Fifteen	management ponds located	located 2.1 km from Fifteen	located 3.55 km from Fifteen
					Mile Stream	Mile Stream	within 3.65 km	Mile Stream	within 2.69 km	Mile Stream	Mile Stream
					with road	with road	of Fifteen Mile	with road	of Fifteen Mile	with road	with a road
					crossing located	crossing located	Stream and road	crossing located	Stream and road	crossing and	crossing located
					3 km	0.85 km	crossings within	0.85 km	crossings within	transmission	0.85 km
					downstream.	downstream.	0.85 km.	downstream.	0.85 km.	line within the	downstream.
					downstream.	downstream.	0.05 km.	downstream.	0.05 km.	pathway.	downstream.
Technical	Design Factors	Storage to Dam Volume	Ratio	#	6.4	4	2.9	2.8	2.5	11.5	2.94
		Ratio		-							
		Dam Volume	Volume of material	Mm ³	2.16	3.93	4.37	4.59	3.96	1.37	4.98
		Natural Topographic	Qualitative scale	—	Tailings dams	Tailings dams	Tailings dams	Tailings dam are	Tailings dams	A bowl like	Tailings dams
		Containment			are required	are required	are required	required along a	are required	basin provides	are required
					along a large	along a large	around the total	large portion of	around the total	excellent	along a large
					portion of the	portion of the	perimeter and	the perimeter	perimeter.	containment	portion of the
					perimeter with a	perimeter with a	the TMF	with a large	Located in	and is	perimeter with a
					large primary	large primary	provides	primary dam.	topography that	surrounded by	large primary
					dam and a	dam. Located in	generally good	Located in	provides limited	high ground for	dam. Located in
					connecting	topography that	natural	topography that	advantages,	most of the	topography that
					saddle dam.	provides some	containment	provides some		perimeter, and a	provides some
					Located in an	advantages on	with some	advantages on		moderate dam	advantages on
					area that provides	the south edge.	undulating	the south edge.		is required at the outlet of the	the south edge.
					generally good		topography			bowl	
					generally good		l			DOWI	1





Account	Sub-Account	Indicator	Parameter	Unit	Alternative A	Alternative B	Alternative C	Alternative D	Alternative E	Alternative F	Alternative G
					natural containment with some undulating						
					topography						
	Safety Factors	Monitoring Requirements	Length of dams	m	3,100	3,100	4,000	3,600	3,300	2,050	3,600
	,	Dam Height	Final dam height	m	29	32	23	40	48	32	36
		Impoundment Configuration	Number of bends	#	4	3	8	6	9	2	7
		Contaminant Management	Qualitative scale	_	Conventional slurry tailings with 4 water management ponds and 3,450 m of seepage	Conventional slurry tailings with 3 water management ponds and 3,650 m of seepage	Filtered tailings with a travel distance of 3 km and a TMF surface area of 122.7 ha	Conventional slurry tailings with 5 water management ponds and 3,700 m of seepage	Filtered tailings with a travel distance of 1.5 km and a TMF surface area of 111.6 ha	Conventional slurry tailings with 3 water management ponds and 2,200 m of seepage	Conventional slurry tailings with 3 water management ponds and 4,546 m of seepage
					ditching	ditching		ditching		ditching	ditching
	Water Management	Length of Seepage Ditching	Length of ditches	m	3,450	2,750	3,675	3,525	5,675	2,125	4,100
		Number of Pumps and Pipelines	Qualitative scale		Alternative requires a 6,750 m long pipeline, 2 pumps, and 820 m of ditches	Alternative requires a 920 m pipeline, 1 pump, and no ditches	Alternative requires 3,740 m of pipeline, 2 pumps, and no ditches	Alternative requires 1,250 m of pipeline, 1 pump, and no ditches	Alternative requires 1,470 m of pipeline, 2 pumps, and no ditches	Alternative requires 7,200 m of pipeline, 2 pumps, and 3,100 m of ditches	Alternative requires 820 m of pipeline, 2 pumps, and no ditches
		Impacts to Annual Water Balance	Impacted catchment area	ha	158	187	210	155	158	235	145
		Reclaim Water Return	Distance to mill	km	7.2	2.2	3	2.2	1.5	7.7	2.2
	Final Embankment Configuration	Final Embankment Construction	Qualitative scale	-	Final embankment would require approximately 1.91 Mm ³ of dam construction materials and 1,900 m of new seepage ditching	Final embankment would require approximately 2.71 Mm ³ of dam construction materials and 1,200 m of new seepage ditching	Final embankment would require approximately 3.68 Mm ³ of dam construction materials and 850 m of new seepage ditching	Final embankment would require approximately 3.02 Mm ³ of dam construction materials and 1,000 m of new seepage ditching	Final embankment would require approximately 2.87 Mm ³ of dam construction materials and 700 m of new seepage ditching	Final embankment would require approximately 0.99 Mm ³ of dam construction materials and 800 m of new seepage ditching	Final embankment would require approximately 3.71 Mm ³ of dam construction materials and 1,600 m of new seepage ditching
	Compliance with Environmental Approvals	Ease of Obtaining Initial Permits	Qualitative scale		Conventional slurry tailings with no baseline knowledge and minimal engineering studies completed. Consultation has not occurred, and the anticipated	Conventional slurry tailings with good baseline knowledge and preliminary engineering studies completed. Consultation has occurred, and the anticipated	Filtered tailings with good baseline knowledge and some engineering studies completed. Consultation has partially occurred, and the anticipated	Conventional slurry tailings with good baseline knowledge and minimal engineering studies completed. Consultation has partially occurred, and	Filtered tailings with good baseline knowledge and some engineering studies completed. Consultation has partially occurred, and the anticipated	Conventional slurry tailings with no baseline knowledge and minimal engineering studies completed. Consultation has not occurred, and the anticipated	Conventional slurry tailings with good baseline knowledge and preliminary engineering studies completed. Consultation has not occurred, and the





Account	Sub-Account	Indicator	Parameter	Unit	Alternative A	Alternative B	Alternative C	Alternative D	Alternative E	Alternative F	Alternative G
					permitting	permitting	permitting	the anticipated	permitting	permitting	anticipated
					schedule would	schedule would	schedule would	permitting	schedule would	schedule would	permitting
					be moderate.	be short.	be long.	schedule would	be long.	be moderate	schedule would
								be moderate			be moderate
	Complexity of	Tailings Disposal	Qualitative scale		Conventional	Conventional	Filtered tailings	Conventional	Filtered tailings	Conventional	Conventional
	Operations				slurry tailings	slurry tailings	process	slurry tailings	process	slurry tailings	slurry tailings
					process located 4.6 km from	process located 0.8 km from	requiring	process located 0.5 km from	requiring	process located 6.0 km from	process located 0.7 km from
					process facility	process facility	extensive human	process facility	extensive human	process facility	process facility
					process facility	process facility	intervention to	process facility	intervention to	process facility	process facility
							deposit tailings,		deposit tailings,		
							located 0.8 km		located 0.5 km		
							from process		from process		
							facility		facility		
		Processing Complexity	Qualitative scale		Conventional	Conventional	Filtered tailings	Conventional	Filtered tailings	Conventional	Conventional
		5 1 5	-		slurry tailings	slurry tailings	with higher	slurry tailings	with higher	slurry tailings	slurry tailings
					with a pipeline	with a pipeline	system		system	with a pipeline	with a pipeline
					distance of 8.5	distance of 3.5	complexity due		complexity due	distance of 9	distance of 3.5
					km, which will	km	to a travel		to a travel	km, which will	km
					require higher		distance of 3 km		distance of 1.5	require higher	
					pumping system		and 6 water		km and 6 water	pumping system	
							management		management		
		Distance from the Mill	Distance	luna	4.6	0.9	ponds 0.8	0.5	ponds 0.5	6	0.7
		Elevation from the Mill	Distance Elevation of dam crest	km masl	143	0.8	173	168	171	149	168
					Conventional	Conventional	Filtered tailings,	Conventional	Filtered tailings,	Conventional	Conventional
		Climatic Challenges	Qualitative scale	—	slurry tailings	slurry tailings	located 3.0 km	slurry tailings	located 1.5 km	slurry tailings	slurry tailings
					with an 8.5 km	with a 3.5 km	away, with	with a 3.5 km	away, with	with a 9.0 km	with a 3.5 km
					pipeline, with an	pipeline	higher potential	pipeline	higher potential	pipeline, with an	pipeline
					increased risk of		for operational		for operational	increased risk of	
					freezing		delays due		delays due	freezing	
							tailings freezing		tailings freezing		
							and materials		and materials		
							handling		handling		
							challenges		challenges		
							during winter		during winter		
	Constructability	Material Availability	Distance to suitable materials	km	5	1.5	1.5	1.5	1.5	7.5	1.5
		Foundation Suitability	Qualitative scale	_	Dam	Dam	Dam	Dam	Dam	Dam	Dam
		-			constructed for	constructed for	constructed for	constructed for	constructed for	constructed for	constructed for
					conventional	conventional	filtered tailings,	conventional	filtered tailings	conventional	conventional
					slurry tailings,	slurry tailings,	with well	slurry tailings,	with well	slurry tailings,	slurry tailings,
					with unknown	with foundation	understood	with well	understood	with unknown	with well
					foundation	conditions	foundation	understood	foundation	foundation	understood
					conditions		conditions	foundation	conditions	conditions	foundation
Project	Total TMF Costs	Initial Capital Costs	Cost (millions)	\$	22.52	13.83	47.12	conditions 18.26	55.39	25.75	conditions 13.83
Economics		Sustaining Capital Costs	Cost (millions)	\$	13.73	13.83	20.57	15.61	12.96	10.1	19.03
			Cost (millions)		6.25	2.16	63.37	2.67	64.21	5.53	2.29
		Operating Costs		\$							
		Closure Costs	Cost (millions)	\$	10.93	14.47	10.92	11.77	10.51	22.68	11.07







Account	Sub-Account	Indicator	Parameter	Unit	Alternative A	Alternative B	Alternative C	Alternative D	Alternative E	Alternative F	Alternative G
		Post-Closure Costs	Cost (millions)	\$	2.42	2.42	3.12	2.81	2.58	1.60	2.81
		Ancillary Costs	Cost (millions)	\$	6.09	2.94	3.36	1.41	1.1	12.07	0.23
	Economic Risks	Projected Timeline for Permits	Change in NPV	\$	7.6	0	11.4	3.8	11.4	7.6	7.6
		Projected Timeline for Start of Operations	Qualitative scale	-	Conventional slurry tailings with no baseline knowledge and minimal engineering studies completed. Consultation has not occurred,	Conventional slurry tailings with good baseline knowledge and preliminary engineering studies completed. Consultation has	Filtered tailings with good baseline knowledge and some engineering studies completed. Consultation has partially	Conventional slurry tailings with good baseline knowledge and minimal engineering studies completed. Consultation has	Filtered tailings with good baseline knowledge and some engineering studies completed. Consultation has partially	Conventional slurry tailings with no baseline knowledge and minimal engineering studies completed. Consultation has not occurred,	Conventional slurry tailings with good baseline knowledge and preliminary engineering studies completed. Consultation has
					and the anticipated permitting schedule would be moderate.	occurred, and the anticipated permitting schedule would be short.	occurred, and the anticipated permitting schedule would be long.	partially occurred, and the anticipated permitting schedule would be moderate	occurred, and the anticipated permitting schedule would be long.	and the anticipated permitting schedule would be moderate	not occurred, and the anticipated permitting schedule would be moderate
Socioeconomics	Land Use	Loss of Fishing	Area of aquatic habitat	ha	2.39	0.14	0.17	0.14	0.12	1.14	0.0
		Loss of Commercial Forest Harvesting	Area of forest lost	ha	0.0	1.0	0.0	1.5	1.1	4.6	1.3
		Loss of ATV Trails	Length of trails lost	km	0.00	1.24	1.28	1.31	0.68	2.01	0.72
		Loss of Private Land Ownership	Area of private lands	ha	46.4	0	0	0	1.3	51.5	0
	Human Health and Public Safety	Fugitive Dust	Qualitative scale	-	Conventional slurry tailings with a footprint of 90 ha located 4.6 km from the processing facility	Conventional slurry tailings with a footprint of 142 ha located 0.8 km from the processing facility	Filtered tailings with a footprint of 122 ha located 0.8 km from the processing facility	Conventional slurry tailings with a footprint of 122 ha and located 0.5 km from the processing facility	Filtered tailings with a footprint of 111 ha located 0.5 km from processing facility	Conventional slurry tailings with a footprint of 158 ha located 6.0 km from processing facility	Conventional slurry tailings with a footprint of 112 ha located 0.7 km from the processing facility
		Hazard Potential to the Public	Qualitative scale	-	Conventional slurry tailings located 0.2 km from Fifteen Mile Stream with a road crossing located 3 km downstream	Conventional slurry tailings located 3.55 km from Fifteen Mile Stream with road crossing located 0.85 km downstream	Filtered tailings with water management ponds located within 3.65 km of Fifteen Mile Stream and road crossings within 0.85 km	Conventional slurry tailings located 2.87 km from Fifteen Mile Stream with road crossing located 0.85 km downstream	Filtered tailings with water management ponds located within 2.69 km of Fifteen Mile Stream and road crossings within 0.85 km	Conventional slurry tailings located 2.1 km from Fifteen Mile Stream with road crossings and transmission line within the pathway	Conventional slurry tailings located 3.55 km from Fifteen Mile Stream with road crossing located 0.85 km downstream
		Risk to Workers	Qualitative scale	_	Conventional tailings TMF located 4.6 km from mine workings with a	Conventional tailings TMF located 0.8 km from mine workings with a	Filtered tailings TMF located 0.8 km from mine workings with a	Conventional tailings TMF located 0.5 km from mine workings with a	Filtered tailings TMF located 0.5 km from mine workings with a	Conventional tailings TMF located 6.0 km from mine workings with a	Conventional tailings TMF located 0.7 km from mine workings with a





Account	Sub-Account	Indicator	Parameter	Unit	Alternative A	Alternative B	Alternative C	Alternative D	Alternative E	Alternative F	Alternative G
					dam height of						
					29 m.	32 m.	23 m.	40 m.	48 m.	32 m.	36 m.
	Operational Impact	Change in Aesthetics / Visual Impacts	Dam Height	m	29	32	23	40	48	32	36
		Noise Emissions	Distance from TMF to receptor	km	9.45	5.74	5.81	5.56	5.62	9.32	5.76
	Local Economic Risk	Loss of Local Jobs and	Qualitative scale		There is no	There is no	There is a	There is a minor	There is a	There is slight	There is a minor
		Business Opportunities			change in the	change in the	significant	increase in the	significant	reduction in the	increase in the
					capital and	capital and	increase in the	capital and	increase in the	capital and	capital and
					operational	operational	capital and	operational	capital and	operational	operational
					costs associated	costs associated	operational	costs associated	operational	costs associated	costs associated
					with the TMF	with the TMF	costs associated	with the TMF	costs associated	with the TMF	with the TMF
					alternative.	alternative.	with the TMF	alternative.	with the TMF	alternative.	alternative.
							alternative.		alternative.		





Account	Sub-Account	Sub-Account Rationale	Indicator	Indicator Ration
Environmental	Water Quality	Changes to water quality could harm aquatic species and other animals using the water.	Water Treatment Requirements	Alternatives have water treatment concepts intended to meet alternatives that have more water being discharged will have alternatives with greater water storage capacity will be better during periods of poorer water quality, maintenance / repair precipitation events.
			Flexibility for Water Treatment and Recycle	Alternatives which could pump excess water amongst multiple treatment before discharge to the environment are preferred capacity to handle excess water will have rigid discharge require changes to the water balance.
	Hydrology	Localized hydrology can be altered by the TMF alternatives through direct overprinting of drainage channels or by changes to the flows and water levels in nearby waters.	Catchment Impacted	Once the perimeter ditch surrounding the TMF has been con- catchment areas that the TMF overprints will be captured into catchment area to adjacent watercourses. This has the potent reducing flows in adjacent watercourses that have reduced ca- greater flow reductions, measured at the nearest downstrean affect hydrological regimes and reduce fish and fish habitat a
			Number of Affected Sub-watersheds	To maintain a compact site footprint and limit the extent of e the majority of the Project footprint within the minimum num practicable. Alternatives that extend into additional sub-wate water quantities. Alternatives that are limited to a single sub- a compact footprint and limit the overall extent of Project eff
	Aquatic Resources	All the alternatives have been sited to avoid lakes and large rivers. However, several of the alternatives would overprint waters frequented by fish, resulting in a change to fish habitat that would require fish habitat offset in	Loss of Fish Habitat (Waterbodies)	There are numerous waterbodies surrounding the Project site waterbodies have been avoided by all of the alternatives carr alternatives would overprint smaller ponds. These alternatives constructed under the <i>Fisheries Act</i> so no net loss of habitat w waterbodies should be avoided.
		accordance with the <i>Fisheries Act</i> and the MDMER.	Loss of Fish Habitat (Watercourses)	There are (intermittent, and/or permanently flowing) waterco throughout the year and are considered main channel to the these creeks to be fish bearing, and overprinting would affect overprint main stem watercourses should be avoided.
			Number of Watercourse Crossings	Haul roads and pipelines that cross watercourses have the po- embankments, channel and substrate characteristics. Vehicle quality of fish habitat. Alternatives that do not require roads preferred.
	Terrestrial Resources	Overprinting of land for the TMF and ancillary infrastructure results in direct habitat loss, although some habitat can	Loss of Wetland	Wetlands have a high ecological value due to their productiv Alternatives that overprint wetlands should be avoided.

Table 5: Rationale for Selection of Sub-Accounts and Indicators

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eet all applicable discharge criteria; however, ve greater loading on the receiver. Additionally, er able to manage upset conditions such as ir cycles in treatment facilities, and high

iple ponds to allow extra aging and water ed. Conversely, alternatives that have minimal quirements that are less able to manage

onstructed, precipitation that falls within the nto the site water balance, resulting in the loss of ential to alter the hydrologic environment by catchment areas. Alternatives resulting in am permanent watercourse, could negatively t and should therefore be avoided.

f environmental effects, Atlantic prefers to keep umber of sub-watersheds, to the extent atersheds could affect surface water and ground b-watershed are preferred as they will maintain effects.

ite that are fish bearing. Although large irried forward to the MAA, some of the ves would require that new fish habitat be t would occur. Alternatives that overprint

courses around the Project site that flow nese tributaries. Baseline studies determined ect fish and fish habitat. Alternatives that

potential to affect fish habitat by altering the le traffic over crossings can further affect the s or pipelines to cross watercourses are

ivity and large fauna and flora diversity.





Account	Sub-Account	Sub-Account Rationale	Indicator	Indicator Ration
		be restored at closure. Terrestrial ecosystems vary within the Project site from dense forests to cleared land and can be assigned an ecological value.	Use of Disturbed Habitat	Areas around the Project have previously been cleared for fo development, and remain today as meadows and sparsely co ecological value compared to other ecosystems. Alternatives
		Alternatives that allow for a more compact site footprint and overprint areas that avoid higher value habitat	Footprint	Total footprint is a good metric for estimating impacts to ter would have less effects on flora and fauna.
		would have less of an impact on the terrestrial ecosystem.	Loss of Forested Area	Forests have a high ecological value due to their importance changes in the area, including forestry, have altered the natu predominantly forested pre-industrial conditions. Due to the mature forests should be avoided.
	Sensitive Species	Some species are sensitive or at risk from disappearing in Nova Scotia or in Canada and have been afforded	Loss of Mainland Moose Habitat	Mainland Moose have been observed near the Project site w wetlands during the summer. Mainland Moose are listed as E
		special protections. Alternatives that have greater potential to harm these species should be avoided.	Loss of Brook Trout Habitat	Brook trout are priority species (S3) that have been observed rear and overwinter near the Project site. Brook Trout are of Nova Scotia's most important sports fish and is also an impo Brook Trout prefers well-oxygenated, coldwater systems typi
	Atmospheric Emissions	Several areas in close proximity to the Project have been assigned Provincial protection due to their recreational, ecological, or unique geological value. Alternatives that are more likely to affect these protected areas should be avoided.	Fugitive Dust	Alternatives have the potential to result in fugitive dust emissibly air currents, or by ground disturbance during hauling of not reducing air quality, fugitive dust could be deposited in new species, as well as on nearby vegetation. Alternatives that ge dust emissions to near the affected Project area, will result in preferred from an air quality perspective.
			GHG Emissions	Atlantic recognizes that GHG emissions are a global problem fuels. Although emissions from the Project will not affect the global GHG emissions and ultimately contribute to climate cl requirements will emit less GHGs and are therefore preferred
			Noise Emissions	Construction / operation of the TMF will result in noise emiss Published literature has identified that sound emissions level can mask important communication signals in wildlife (Dooli harm to migratory birds' website (ECCC, 2017) suggests sour wildlife, especially migratory birds. Alternatives with a compa- will reduce noise emissions and are preferred.
	Protected Areas	Several areas in close proximity to the Project have been assigned Provincial protection due to their recreational, ecological, or unique geological value. Alternatives that are more likely to affect these protected areas should be avoided.	Proximity to Protected Wilderness Areas	Toadfish Lakes and Boggy Lake Wilderness Areas are located Wilderness Area is part of a provincially-significant assembla woodlands that provides refuge for species sensitive to distu Greater distance from the alternatives to the Toadfish Lakes potential effects. Boggy Lake Wilderness Area protects a rep River) Drumlins Natural Landscape, which includes aquatic ha

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forestry and/or disturbed by mineral covered forests. These lands have a relatively low es that utilize these lands are preferred.

errestrial resources. In general, smaller TMFs

ce to the local fauna and flora. Historical land use tural ecosystem within the Project site from neir ecological value, areas covered by dense or

where they forage for aquatic vegetation within Endangered through the Provincial ESA.

ed near the Project site and potentially forage, of great social importance recreationally as one of portant fish for the Mi'kmaq of Nova Scotia. pically with groundwater inputs.

issions when tailings are mechanically disturbed f materials or construction activities. In addition nearby lakes and rivers, affecting aquatic generate less fugitive dust, or contain fugitive in less disturbance to the atmosphere and are

em partially resulting from the burning of fossil ne immediate surrounding area, they add to change. Alternatives with reduced hauling ed.

issions that increase ambient sound levels. vels from 50 to 60 'A'-weighted decibels (dBA) bling and Popper, 2007). The ECCC 'Avoiding und levels exceeding 50 dBA are disruptive to pact footprint and limited construction windows

ed southeast of the Project. Toadfish Lakes plage of protected river corridors, lakes and sturbance, such as endangered mainland moose. As Wilderness Area are preferred to minimize any epresentative portion of the Eastern Shore (Moser habitat and corridors of natural forest used by





Account	Sub-Account	Sub-Account Rationale	Indicator	Indicator Ration
				many species for travel, feeding and shelter. Greater distance are preferred to minimize any potential effects.
	Hazard Potential to the Environment	From an environmental perspective, the hazard potential of the alternatives assesses the overall risk to the aquatic and terrestrial environments in the unlikely event of a TMF failure.	Magnitude of Failure	The TMF for the Project would be constructed to meet all apprendix alternative. That stated, the alternatives differ in the potential a failure, based on the tailings deposition technology (solids Alternatives that utilize tailings deposition with a higher solid containment dams would reduce the magnitude of any potential of any potential statement dams would reduce the magnitude of any potential statement dams would reduce the magnitude of any potential statement dams would reduce the magnitude of any potential statement dams would reduce the magnitude of any potential statement dams would reduce the magnitude of any potential statement dams would reduce the magnitude of any potential statement dams would reduce the magnitude of any potential statement dams would reduce the magnitude of any potential statement dams would reduce the magnitude of any potential statement dams would reduce the magnitude of any potential statement dams would reduce the magnitude of any potential statement dams would reduce the magnitude of any potential statement dams would reduce the magnitude of any potential statement dams would reduce the magnitude of any potential statement dams would reduce the magnitude of any potential statement dams would reduce the magnitude of any potential statement dams would reduce the magnitude statement dams would statement dams would be apprend to the statement dams would be statement d
			Downstream Sensitivities	The potential environmental effects in the unlikely event of a habitats. Alternatives that are located upstream of less sensiti
Technical	Design Factors	Design factors include some of the key factors that contribute to technical complexity of the TMF alternatives. Alternatives that are less technically	Storage to Dam Volume Ratio	Reducing the storage volume to dam volume ratio can increa alternatives with high storage volume to dam volume ratios a less material to build and are preferred.
		challenging are generally preferred.	Dam Volume	Dam volume considers the number, length and height of the alternative. Minimizing the dam volume is preferred.
			Natural Topographic Containment	The natural topography around the Project site includes large containment (less porous, greater stability, and no earth mov rockfill dams, and reduces the need for relatively flat slopes of containment also improves water management for diversions maximize the use of natural topography for containment.
	Safety Factors	Safety is a primary concern when designing the TMF and each alternative can be constructed to the necessary factor of safety. However,	Monitoring Requirements	Atlantic will be required to monitor and maintain the TMF fol has deemed the site remediated and no further monitoring is increase the safety risk, thereby requiring additional monitori
		some technical factors have the potential to increase the risk or consequence of failure and should therefore be avoided.	Dam Height	There is generally a proportional increase in potential conseq height. In the unlikely event of failure, taller facilities have gre Shorter dam heights are therefore considered to incur less ris
			Impoundment Configuration	Dams are ideally constructed between two bedrock outcrops weaker points in the structure and these areas are more pron comparable straight sections. Alternatives that avoid bends in
			Contaminant Management	Alternatives have the potential to result in fugitive dust and p mechanically disturbed by air currents, or by ground disturba construction activities. As particulate matter from tailings filte Provincial approvals may include the requirement for air qual boundary. Alternatives that are more likely to generate air em property boundary will the risk of non-compliance with envir In addition, alternatives have water treatment concepts inter- criteria are met; however, alternatives that have higher water

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ce from the alternatives to the Wilderness Areas

ppropriate factors of safety regardless of the ial environmental effects in the unlikely event of ls content) and the reclaim pond location. lids content with the reclaim pond outside of the rential failure and are preferred.

a failure could impact sensitive downstream itive downstream habitats are preferred.

ease the efficiency of the TMF. Further, s are generally easier to construct and require

ne combined dams required for a particular

rge bedrock outcrops that provide more suitable oving requirements) compared to conventional s on a filtered stack. Natural topographic ons and seepage collection. Design should

ollowing closure until the regulatory authority is required. Alternatives with more dams will pring during operation and are less preferred.

equence of dam failure with an increase in TMF preater potential energy to move materials. risk and are the preferred alternative.

os for maximum stability. Bends in dams are one to failure than straight sections over i in the dams are preferred.

I particulate matter emissions when tailings are bance during hauling of materials, or ltered stack may contain metals in the dust, ality to meet specified criteria at the property emissions, or create air emissions near the vironmental approvals and should be avoided. ended to ensure that all applicable discharge er quality concerns (ARD) may have greater





Account	Sub-Account	Sub-Account Rationale	Indicator	Indicator Ration
F C E				loading on the receiver. Alternatives that have greater water these conditions.
	Water Management	Water management is a primary consideration when designing both the TMF. Reclaim water is an integral part of processing and there needs to be	Length of Seepage Ditching	As required by the MDMER, each alternative will be equipped including ditching and seepage collection ponds to prevent of Alternatives with less ditching will allow for easier compliance
		sufficient storage or water on site at all times. However, excess water on site will require treatment prior to discharge to ensure environmental protection.	Number of Pumps and Pipelines	In addition to the seepage collection infrastructure, all alterna collection system, which would likely include perimeter ditch areas. Contact water captured from runoff or seepage will be may subsequently be pumped to the process plant for recycl before being discharged. Alternatives with fewer pumps and
			Impacts to Annual Water Balance	A conceptual water balance of the Project site has determine inventory and will require treatment prior to discharge to the dewatering processes or larger catchment areas will result in management. The currently envisioned water treatment plant alternatives and additional water management infrastructure plant. Alternatives with increased quantities of water requirin
			Reclaim Water Return	Each alternative will require that the seepage and runoff colle and the reclaim pond be pumped back to the ore processing the closed-loop water management approach. There will be t distance reclaim water required to be pumped back to the or inspections, maintenance and operating in winter conditions. pump reclaim water back to the ore processing plant are pre-
	Final Embankment Configuration	Although Atlantic cannot speculate on future reserves / resources, it is conceivable that with ongoing mineral exploration in the area a new mineral reserve could be discovered or existing reserves expanded. The mining of additional ore would increase the quantity of tailings requiring storage. Alternatives that allow for future TMF expansion increase the feasibility of and technical flexibility of potential mine expansions.	Final Embankment Construction	In the event that additional ore reserves are identified, it may to expand the TMF as opposed to constructing a new cell. Al- and infrastructure required to construct to a final embankme capacity are preferred.
	Compliance with Environmental Approvals	The chosen alternative would need to complete provincial regulatory processes prior to use, and would need to comply with all environmental approvals. Alternatives with environmental approvals that are	Ease of Obtaining Initial Permits	Alternatives using proven technology will have fewer technical concerns. The ability to obtain permits for these alternatives

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er storage capacity are better able to manage

ped with seepage collection infrastructure, nt contact water from leaving the site. nce with the MDMER and are preferred.

rnatives would be equipped with a runoff ching as well as collection ponds in low-lying be pumped into the TMF supernatant pond and ycle or to the water treatment plant (if necessary) nd pipelines are preferred.

ned that water will accumulate in the site the environment. Alternatives with tailings in additional water requiring treatment and ant may not meet the needs of some of the the could be required such as a larger treatment ring treatment should be avoided.

ollected in either the seepage collection ponds ng plant for use in the process plant to maintain be technical challenges associated with the ore processing plant for use such as line ns. Alternatives that have a shorter distance to preferred from a technical perspective.

hay be advantageous from a technical perspective Alternatives with smaller amount of materials nent that will accommodate for the expansion

nical challenges and less socio-environmental es would be less challenging.





Account	Sub-Account	Sub-Account Rationale	Indicator	Indicator Ration
		expected to be technically challenging to comply with could result in Atlantic being in noncompliance.		
	Complexity of Operations	The operation of the alternative depends on technical solutions to process tailings, transport to the tailings management facility and manage water. Alternatives that	Tailings Disposal	The effort required in depositing tailings in the TMF is consid more complex the process of depositing tailings, the more su problems and plant downtime. Alternatives that require infree TMF are preferred from a technical perspective.
		require a complex set of components and operation increase the risk of downtime, intervention and overall inefficiency.	Processing Complexity	The more complex the process of dewatering tailings, the more problems and plant downtime. Alternatives that require infree TMF are preferred from a technical perspective.
			Distance from the Mill	Alternatives that are situated further from the ore processing infrastructure requirements such as longer haul roads, reclain transportation infrastructure requirements increase the likelih surrounding terrain (e.g. river crossings, steep hills, etc.). Add plant is the primary considerations for filtered stack tailings a TMF. Alternatives that are located close to the ore processing
			Elevation from the Mill	The elevation differential between the alternative and the mil of operations to transport tailings. A low differential is prefer
			Climatic Challenges	Operating a TMF could have challenges as a result of cold or challenges common in the Nova Scotia during winter and we
	Constructability	uctability The ability to construct the alternative depends on site conditions and the availability of materials necessary for the facility.	Material Availability	Rockfill dams will require large quantities of rock to construct transition or bedding material. The dam materials may need t depending on the quantities and site availability.
			Foundation Suitability	TMF alternatives are ideally situated on hard rock for foundat overburden, free draining material is preferred to reduce pote the dam foundations. Alternatives positioned over more stab a technical design perspective.
Project Economics	Total TMF Costs	Overall costs of constructing, operating and closing the alternative.	Initial Capital Costs	Capital costs required for the TMF are a key consideration where require extensive dam construction, and earth works or costly include site clearing, infrastructure for water management and seepage collection infrastructure.
			Sustaining Capital Costs	TMF impoundment dams are generally one of the greatest co deposited as a conventional slurry or filtered tailings. Typicall of the mine as dam raises to defer the cost.
			Operating Costs	Operational costs associated with tailings deposition and wat economics as these expenses occur at regular intervals through

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Account	Sub-Account	Sub-Account Rationale	Indicator	Indicator Ration
			Closure Costs	The closure costs associated with the TMF include the cost of to a stable and more ecologically productive state, in accorda closure costs will increase the requirement for closure bondin financial performance.
			Post-Closure Costs	Post-closure costs generally include long term dam monitorin needed.
			Ancillary Costs	Some of the alternatives will result in ancillary costs that will offsetting. Alternatives with less ancillary costs are preferred.
	Economic Risk	Some of the alternatives bring inherent risk to Project economics, could result in schedule delays and risk overall Project viability.	Projected Timeline for Permits	There is the possibility that some alternatives could result in approvals, ultimately delaying Project construction and opera Atlantic and would impact the overall feasibility of the Project
			Projected Timeline for Start of Operation	Some of the TMF alternatives will have additional technical or proceeding with construction. This could result in the delay is would have a significant cost to Atlantic and would impact the
Socioeconomics	Land Use	The Project is located in an area that is sparsely populated with infrequent	Loss of Fishing	Fishing is common throughout the region and alternatives th
		land use. Atlantic understands the importance of traditional land use and heritage values to Indigenous peoples in the vicinity of the Project, and have taken the necessary steps through	Loss of Commercial Forest Harvesting	During the site preparation and construction phase of the Pro Project area may be removed by local forestry companies. Fo overprinted by the TMF will be unavailable for forestry. Alterr to long term forestry in the Project vicinity.
		engagement to better understand what these values are and how to effectively mitigate negative Project effects. Minimizing or avoiding potential effects to local people's values is an integral part of Project development, along with balancing these values with the need for regional economic development. Alternatives that avoid interference with existing land uses are preferred.	Loss of ATV trails	There is the potential that local residents utilize the cleared a recreation, including ATVing and snowmobiling. Alternatives recreational trails are preferred.
			Loss of Private Land Ownership	Some of the lands in the area adjacent to the Project site are overprint or encroach on these lands could result in a loss of
	Human Health and Public Safety	Alternatives that have the potential to harm human health and public safety should be avoided.	Fugitive Dust	TMF alternatives have the potential to increase the risk to pur fugitive dust coming off the TMF. The quantity of fugitive dus to the level of dewatering to the tailings prior to deposition a is subject to wind erosion. Alternatives that increase the risk t exposure should be avoided.

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of decommissioning and rehabilitating the site rdance with regulatory requirements. Extensive ding and will ultimately affect overall project

ring and maintenance or water treatment if

ll impact project economics, such as fish habitat d.

n the delay or rejection of environmental erations. This would have a significant cost to ect.

or environmental requirements before y in the commencement of operations, which the overall feasibility of the Project.

that affect less lake habitat are preferred.

Project, the merchantable timber from the Following closure and reclamation, the area ernatives with a smaller TMF will have less effects

area running through the Project site for es less likely to restrict or alter access along

re privately owned, and alternatives that of private land ownership.

public health and safety from exposure to dust production is considered to be proportional in as well as the total surface area of the TMF that k to public health and safety from fugitive dust





	Account	Sub-Account	Sub-Account Rationale	Indicator	Indicator Ration
Account			Hazard Potential to the Public	Each alternative will be designed and construction to meet al some of the alternatives have a greater hazard potential in re the tailings in the unlikely event of a failure, and the distance (road) used by the public. Alternatives that increase the risk to avoided.	
				Risk to Workers	The TMF alternatives have the potential to increase risk to we failure, water management failure. Alternatives with less risk t
		Operational Impact (Noise and Aesthetics)	The Project is located in an area that is sparsely populated with infrequent land use. As a result of the TMF, there could be effects to these local people including noise emissions, and	Change in Aesthetics / Visual Impacts	During the EA process, Indigenous peoples and local stakeho aesthetics of the natural landscape. The maximum elevation of to the visibility of the alternatives. Alternatives with a lower m aesthetics perspective as surrounding terrain would conceal m
		aesthetics that could affect their enjoyment of the area.	Noise Emissions	The construction of the TMF impoundment dams in the case along with the transportation and contouring of the TMF in t result in noise emissions. Although noise levels will need to b locations, noise produced by TMF construction could be cons Alternatives with greater construction requirements should b	
		Local economic Risk	The cost of constructing, operating and closing a TMF contributes to the overall gold production costs for a Project. Alternatives with a costlier TMF would have a higher overall gold production cost. Should the globe price of gold decrease below the gold production cost for an extended period, Atlantic could be in a situation where it is forced to enter a period of care and maintenance, or early closure. During this state, the primary economic benefits of the Project on the local economy would be lost.	Loss of Local Jobs and Business Opportunities	The Project has the potential to be a major contributor to the economic margins are more prone to volatility in gold prices suspension of operations and entering a care and maintenan employment and business opportunities.

Table 6: Multiple Accounts Analysis Valuating Criteria

Account	Sub-Account	Indicator	Parameter	11:*	Indicator Value					
				Unit	6 (Highest)	5	4	3	2	1 (Lowest)
Environment	Water Quality	Water Treatment Requirements	Qualitative scale	—	Very High – large	High – large water	Moderate to High	Low to Moderate -	Low – moderate	Very Low –
					water storage	storage volume	- large water	large water	water storage	moderate water
					volume capacity,	capacity, with a	storage volume	storage volume	volume capacity,	storage volume
					with a large	large receiving	capacity, with a	capacity, with a	with a large	capacity, with a

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all appropriate factors of safety. That stated, regards to public safety based on the fluidity of ce from the nearest cottage, or infrastructure < to the health and safety of the public should be

worker health, such as exposure to dust, TMF k to worker health are preferred.

holders identified the importance of the visual n of the TMF was assessed as being proportional r maximum elevation are preferred from an al more of the TMF.

se of conventional slurry and thickened tailings, in the case of filtered tailings deposition, will all be limited to the regulatory limits at receptor possidered a nuisance in the vicinity of the Project. I be avoided.

he local economy. Alternatives with very tight es and the Canadian dollar, which could result in ance phase. This would negatively affect local





A		La Posto -	D e se se sta s	11.14			Indicator Value				
Account	Sub-Account	Indicator	Parameter	Unit	6 (Highest)	5	4	3	2	1 (Lowest)	
					receiving	waterbody and	moderate	small receiving	receiving	moderate -large	
					waterbody and	few water	receiving	waterbody and	waterbody and	receiving	
					numerous water	managements	waterbody and	numerous water	numerous water	waterbody and	
					managements	ponds	numerous water	managements	managements	few water	
					ponds		managements	ponds	ponds	managements	
							ponds			ponds	
		Flexibility for Water Treatment and Recycle	Qualitative scale	—	>6	6	5	4	3	<3	
	Hydrology	Watercourse Realignments	Length of realignment	m	<14	14.5 to 43	43.5 to 70	70.5 to 99	99.5 to 127	>127	
		Catchment Impacted	Length of stream where loss is over 25%	m	<500	500 to 1,250	1,251 to 2,000	2,001 to 2,750	2,751 to 3,500	>3,500	
		Number of Affected Sub- watersheds	Number of sub-watersheds	#	1	2	3	4	5	>5	
	Aquatic Resources	Loss of Fish Habitat (waterbody)	Area of waterbody	ha	<0.15	016 to 0.45	0.46 to 0.75	0.76 to 1.05	1.06 to 1.35	>1.35	
		Loss of Fish Habitat (watercourse)	Length of watercourse	m	<263	264 to 790	791 to 1,315	1,316 to 1,844	1,845 to 2,370	>2,370	
		Number of new crossings	Number of crossings	#	0	1	2	3	4	>4	
	Terrestrial Resources	Loss of Wetland	Area of wetland	ha	<6	6 to 7	7 to 8	8 to 9	9 to 10	>10	
		Use of Disturbed Habitat	Area of disturbed habitat	ha	<1.5	1.5 to 2.0	2.1 to 2.5	2.6 to 3.1	3.2 to 3.7	>3.7	
		Footprint	Area	ha	<95	95 to 104	105 to 114	115 to 124	125 to 134	>134	
		Loss of Forested Area	Area	ha	<85	85 to 94	95 to 104	105 to 114	115 to 120	>120	
	Sensitive Species	Loss of Mainland Moose Habitat	Area of potential habitat	ha	<6.3	6.3 to 7.1	7.2 to 8.0	8.1 to 8.9	9.0 to 9.9	>9.9	
		Loss of Brook Trout Habitat	Area of potential habitat	ha	<263	263 to 790	791 to 1,317	1,318 to 1,844	1,845 to 2,370	>2,370	
	Atmospheric Emissions	Fugitive Dust	Qualitative scale		Excellent -	Very Good -	Good -	Fair - Filtered	Poor - Filtered	Very Poor -	
					Conventional	Conventional	Conventional	tailings with a	tailings with a	Filtered tailings	
					slurry tailings with	slurry tailings with	slurry tailings with	small footprint	small footprint	with a large	
					a small footprint	a small footprint	a large footprint	(<113 ha) and	(<113 ha) or small	footprint (<122	
					(<113 ha) and	(<113 ha) or a	(>122 ha) and	small distance to	distance to	ha) and large	
					short distance to	short distance to	large distance to	processing facility	processing facility	distance to	
					processing facility	the processing	processing facility	(<1 km)	(<1 km)	processing facility	
					(<1 km)	facility (<1 km)	(>5 km)			(<5 km)	
		GHG Emissions	Qualitative scale		Excellent -	Very Good -	Good -	Fair - Construction	Poor -	Very Poor -	
					Construction of a	Construction of a	Construction of a	of a filtered	Conventional	Construction of a	
					conventional slurry	conventional slurry	conventional slurry	tailings facility	slurry tailings with	filtered tailings	
					tailings facility	tailings facility	tailings facility	with a small area	a small area to	facility with a large	
					with a small area required for	with a small to moderate area	with a large area required for	required for clearing, and	clear. Tailings dam requires minimal	area required for clearing, and	
					clearing, and	required for	clearing, and	minimal volume of	to moderate	substantial volume	
					minimal volume of	clearing. Tailings	substantial volume	dam construction	volume of dam	of dam	
					dam construction	dam requires	of dam	materials to haul	construction	construction	
					materials to haul	minimal to	construction	over a short	materials to haul	materials to haul	
					over a short	moderate volume	materials to haul	distance. Requires	over a short to	over a large	
					distance	of dam	over a long	hauling of filtered	moderate distance.	distance. Requires	
						construction	distance	tailings during	Requires hauling	hauling of filtered	
						materials to haul		operation.	of filtered tailings	tailings during	
						over a short to			during operation.	operation.	
						moderate distance					
		Noise Emissions	Distance from TMF to receptor	m	>7,751	7,251 to 7,750	6,751 to 7,250	6,251 to 6,750	5,750 to 6,250	<6,250	





							Indicate	or Value		
Account	Sub-Account	Indicator	Parameter	Unit	6 (Highest)	5	4	3	2	1 (Lowest)
	Protected Areas	Proximity to Protected Areas	Distance from TMF to protected area	m	>3,440	3,015 to 3,440	2,591 to 3,014	2,166 to 2,590	1,740 to 2,165	<1,740
	Hazard Potential to the Environment	Magnitude of Failure	Qualitative scale		Excellent - Filtered tailings with no downstream water management ponds and low, short dam	Very Good - Filtered tailings, with a downstream water management pond and a high dam or long dam length	Good - Filtered tailings, with numerous downstream water management ponds and a high, long dam	Fair - Slurry tailings with a supernatant pond with a low height dam and short length dam	Poor - Slurry tailings with a supernatant pond and a moderate to high dam or moderate to long dam length	Very Poor - Slurry tailings with a supernatant pond and a high height dam and high length dam
		Downstream Sensitivities	Qualitative scale	_	Excellent - Filtered tailings water management ponds located over 3 km from Fifteen Mile Stream.	Very Good - Filtered tailings water management ponds located less then 3 km from Fifteen Mile Stream.	Good - Conventional slurry tailings located over 3 km from Fifteen Mile Stream.	Fair - Conventional slurry tailings located between 1 and 3 km from Fifteen Mile Stream.	Poor - Conventional slurry tailings located between 1 and 3 km from Fifteen Mile Stream, with infrastructure potentially impacted.	Very Poor - Conventional slurry tailings located over 3 km from Fifteen Mile Stream.
Technical	Design Factors	Storage to Dam Volume Ratio	Ratio	#	>8.3	7.1 to 8.3	5.7 to 7.0	4.5 to 5.6	3.1 to 4.4	<3.1
		Dam Volume	Volume of material	Mm ³	<1.60	1.60 to 2.19	2.2 to 2.69	2.7 to 3.19	3.2 to 3.79	>3.8
	Safety Factors	Natural Topographic Containment	Qualitative scale		Excellent - a bowl like basin provides excellent containment and is surrounded by high ground for most of the perimeter, a small dam / seepage collection ditch may be required at the outlet of the bowl	Very Good – a bowl like basin provides very good containment and is generally surrounded by high ground, dams / seepage collection are required along the downgradient side and limited saddle dam may be required between areas of high ground	Good – dams / seepage collection are required along a large portion of the perimeter with a large primary dam and many saddle dams, the height and volume of most saddle dams is limited due to some topographic advantages, topography within TMF may provide good natural containment	Fair – surrounding topography provides limited advantages and extensive dams / seepage collection required for majority of perimeter, varying topography within TMF may reduce total storage capacity	Poor - perimeter or near perimeter dams / seepage collection required, topography within TMF notably reduces storage capacity	Very Poor - perimeter dams / seepage collection required with no natural containment, high ground such as a hill within the TMF significantly reduces storage capacity
	Safety Factors	Monitoring Requirements	Length of dams	m	<2,190	2,190 to 2,467	2,468 to 2,745	2,746 to 3,024	3,025 to 3,303	>3,303
		Dam Height	Final dam height	m	<25	25.0 to 28.0	28.1 to 32.0	32.1 to 35.5	35.6 to 39.1	>39.1
		Impoundment Configuration	Number of bends	#	<3	J Vor Cood		5 Fair Filtered	6 Deer Filtered	>6
		Contaminant Management	Qualitative scale		Excellent - Conventional slurry tailings with many water management	Very Good - Conventional slurry tailings with few water management	Good - Conventional slurry tailings with few water management	Fair - Filtered tailings with a short travel distance and small TMF surface area	Poor - Filtered tailings with a moderate/long travel distance or moderate/large	Vary Poor - Filtered tailings with a long travel distance and large TMF surface area
							management management	management management management	management management TMF surface area	management management management TMF surface area moderate/large





Account	Sub-Account	Indicator	Parameter	Unit			Indicator Value			
Account	Sub-Account	Indicator	Parameter	Unit	6 (Highest)	5	4	3	2	1 (Lowest)
					minimal required	length of seepage	length of seepage			
					seepage ditching	ditching	ditching			
	Water Management	Length of Seepage Ditching	Length	km	<2,380	2,380 to 2,885	2,886 to 3,394	3,395 to 3,899	3,900 to 4,400	>4400
		Number of Pumps and Pipelines	Quantity	#	Excellent -	Very Good -	Good - Requires a	Fair - Requires a	Poor - Requires a	Very Poor -
					Requires a short	Requires a short	moderate surplus	moderate surplus	long surplus water	Requires a long
					surplus water	surplus water	water pipeline	water pipeline	pipeline length	surplus water
					pipeline length,	pipeline length,	length, with 1 to 2	length, with 1 to 2	with numerous	pipeline length
					with no pumps	with 1 to 2 pumps	pumps and no	pumps and little	pumps and little to	with numerous
					and no ditches	and no ditches	ditches	to moderate ditch	moderate ditch	pumps and a long
								length	length	ditch length
		Impacts to Annual Water Balance	Impacted Catchment Area	ha	<151	151 to 164	165 to 175	176 to 190	191 to 205	>205
		Reclaim Water Return	Distance to mill	km	<1.9	1.9 to 2.7	2.8 to 3.6	3.7 to 4.6	4.7 to 5.5	>5.5
	Final Embankment	Final Embankment Construction	Qualitative scale based on	_	Excellent - Final	Very Good - Final	Good - Final	Fair - Final	Poor - Final	Very Poor - Final
	Configuration		incremental volume of final		embankment	embankment	embankment	embankment	embankment	embankment
	5		dam and length of ditching		requires limited	requires limited	requires limited	requires significant	requires significant	requires significant
			required for expansion of		materials	materials	materials	materials	materials	materials
			dam		(<3,000,000 m ³)	(<3,000,000 m ³)	(<3,000,000 m ³)	(>3,000,000 m ³)	(>3,000,000 m ³)	(>3,000,000 m ³)
					and minimal new	and moderate new	and substantial	and minimal new	and moderate new	and substantial
					ditching (<999 m)	ditching (1,000 to	new ditching	ditching (<999 m)	ditching (1,000 to	new ditching
						1,500 m)	(>1,500 m)		1,500 m)	(>1,500 m)
	Compliance with	Ease of Obtaining Initial Permits	Qualitative scale	_	Very Easy -	Easy -	Easy to Moderate	Moderate to	Difficult - Filtered	Very Difficult -
	Environmental	5			Conventional	Conventional	- Conventional	Difficult - Filtered	tailings with some	Filtered tailings
	Approvals				slurry tailings with	slurry tailings with	slurry tailings with	tailings with good	baseline	with no baseline
					good baseline	some baseline	no baseline	baseline	knowledge and	knowledge or
					knowledge and	knowledge and	knowledge or	knowledge and	engineering	engineering
					preliminary	preliminary	preliminary	preliminary	studies completed.	studies completed.
					engineering	engineering	engineering	engineering	The alternative has	The alternative has
					studies completed.	studies completed.	studies completed.	studies completed.	been partly	not been
					The alternative has	The alternative has	The alternative has	The alternative has	consulted upon	consulted upon
					been adequately	been partly	not been	been consulted	during the EA	during the EA
					consulted upon	consulted upon	consulted upon	upon during the	process, but it is	process, and it is
					during the EA	during the EA	during the EA	EA process, and it	anticipated to take	anticipated to take
					process, and it is	process, and it is	process, and it is	is anticipated to	a long time for	a very long time
					anticipated to take	anticipated to take	anticipated to take	take a moderate	permitting, due to	for permitting, due
					a short time for	a short to	a moderate time	to long time for	unfamiliar	to unfamiliar
					permitting.	moderate time for	for permitting.	permitting, due to	technology.	technology.
						permitting.		unfamiliar		
								technology.		
	Complexity of	Tailings Disposal	Qualitative scale		Excellent - Little	Very Good - Little	Good - Little	Fair - Extensive	Poor - Extensive	Very Poor -
	Operations				human	human	human	human	human	Extensive human
					intervention	intervention	intervention	intervention	intervention	intervention
					required to					
					dewater and					
					deposit the	deposit the	deposit the	deposit the	deposit the tailings	deposit the
				1	tailings into the	tailings into the	tailings into the	tailings into the	into the TMF; TMF	tailings into the
				1	TMF; TMF located	TMF; TMF located	TMF; TMF located	TMF; TMF located	located between 1	TMF; TMF located
				1	<1 km from the	between 1 and 5	>5 km from the	<1 km from the	and 5 km from the	>5 km from the
					processing plant	km from the	processing plant	processing plant	processing plant	processing plant
						processing plant				





A	Indicator Value									
Account	Sub-Account	Indicator	Parameter	Unit	6 (Highest)	5	4	3	2	1 (Lowest)
		Processing Complexity	Qualitative scale	-	Excellent - Conventional	Very Good - Conventional	Good - Conventional	Fair - Filtered tailings with a	Poor - Filtered tailings with a	Very Poor - Filtered tailings
					slurry tailings with	slurry tailings with	slurry tailings with	short travel	moderate to long	with a long travel
					a short pipeline	a moderate	a long pipeline	distance and few	travel distance or	distance and large
					distance	pipeline distance	distance	water	large number of	number of water
								management	water	management
								ponds	management	ponds
									ponds	
		Distance from the Mill	Distance	km	<1.0	1.0 to 1.7	1.8 to 2.5	2.6 to 3.3	3.4 to 4.0	>4.0
		Elevation from the Mill	Elevation of dam crest	masl	<145	145 to 149	150 to 153	154 to 158	159 to 162	>162
		Climatic Challenges	Qualitative scale	—	Very Low –	Low –	Low to Moderate –	Moderate to High	High - filtered	Very High -
					conventional slurry	conventional slurry	conventional slurry	 – filtered tailings 	tailings technology	filtered tailings
					technology with	technology with	technology with	technology	(requires thinner	technology
					shorter total	moderate total	longer total	(requires thinner	tailings layers and	(requires thinner
					pipeline length	pipeline length	pipeline length	tailings layers and	immediate	tailings layers and
					(<2 km)	(~2 to 5 km)	(>5 km)	immediate	compaction in	immediate
								compaction in	frozen conditions,	compaction in
								frozen conditions, heated truck	heated truck beds), with	frozen conditions, heated truck
								beds), with shorter	moderate distance	beds), with longer
								distance to TMF	to TMF (~2 to 5	distance to TMF
								(<2 km)	km)	(>5 km)
	Constructability	Material Availability	Distance to suitable	km						
	, , , , , , , , , , , , , , , , , , ,		materials		<2	2 to 3	3 to 4	4 to 5	5 to 6	>6
		Foundation Suitability	Qualitative scale	_	Filtered stack with	Filtered stack with	Filtered stack with	Conventional	Conventional	Conventional
					good foundations	poor foundations	unknown	slurry dams with	slurry dams with	slurry dams with
					conditions	conditions	foundations	good foundations	poor foundations	unknown
							conditions	conditions	conditions	foundations
										conditions
Project Economics	Total TMF Costs	Initial Capital Costs	Cost (millions)	\$	<17	17 to 22.9	23 to 28.9	29 to 34.9	35 to 41	>41
		Sustaining Capital Costs	Cost (millions)	\$	<10.80	10.80 to 12.30	12.31 to 13.84	13.85 to 15.34	15.35 to 16.80	16.80
		Operating Costs	Cost (millions)	\$	<6.6	6.6 to 15.4	15.5 to 24.2	24.31 to 33.1	33.2 to 42	>42
		Closure Costs	Cost (millions)	\$	<11.38	11.38 to 13.12	13.13 to 14.86	14.87 to 16.60	16.61 to 18.33	>18.33
		Post-Closure Costs	Cost (millions)	\$	<1.70	1.71 to 1.93	1.94 to 2.14	2.15 to 2.36	2.37 to 2.60	>2.60
		Ancillary Costs	Cost (millions)	\$	<1.08	1.08 to 2.77	2.78 to 4.46	4.47 to 6.15	6.16 to 7.84	>7.84
	Economic Risks	Projected Timeline for Permits	Change in NPV	\$	<1.0	1.0 to 2.5	2.6 to 4.0	4.1 to 5.5	5.6 to 7.0	>7.0
		Projected Timeline for Start of	Qualitative scale	_	Conventional	Conventional	Conventional	Filtered tailings	Filtered tailings	Filtered tailings
		Operations			slurry tailings with	slurry tailings with	slurry tailings with	with good	with some baseline	with good
					good baseline knowledge and	some baseline knowledge and	no baseline knowledge or	baseline knowledge and	knowledge and preliminary	baseline knowledge and
					preliminary	preliminary	preliminary	preliminary	engineering	preliminary
					engineering	engineering	engineering	engineering	studies completed.	engineering
					studies completed.	studies completed.	studies completed.	studies completed.	The alternative has	studies completed.
					The alternative has	The alternative has	The alternative has	The alternative has	been partly	The alternative has
					been adequately	been partly	not been	been consulted	consulted upon	not been
					consulted upon	consulted upon	consulted upon	upon during the	during the EA	consulted upon
								EA process, and it		
						-	-		-	_
					anticipated to take	anticipated to take	anticipated to take	take a moderate	a long time for	anticipated to take
					during the EA process, and it is anticipated to take	during the EA process, and it is anticipated to take	during the EA process, and it is anticipated to take	is anticipated to	process, and it is anticipated to take a long time for	during the EA process, and it is anticipated to take





A e e e un t	Sub Account	- Indianta-	Devenueter	Unit			Indicat	or Value		
Account	Sub-Account	Indicator	Parameter	Unit	6 (Highest)	5	4	3	2	1 (Lowest)
					a short time for permitting.	a short to moderate time for permitting.	a moderate time for permitting.	to long time for permitting, due to unfamiliar technology.	permitting, due to unfamiliar technology.	a very long time for permitting, due to unfamiliar technology.
Socioeconomics	Land Use	Loss of Fishing	Area of aquatic habitat	m ²	<1,200	1,201 to 1,500	1,501 to 2,000	2,001 to 2,750	2,751 to 3,500	>3,500
		Loss of Commercial Forest Harvesting	Area of commercial forest lost	ha	<0.33	0.33 to 0.99	1.00 to 1.64	1.65 to 2.30	2.31 to 2.96	>2.96
		Loss of ATV Trails	Length of trails lost	m	<100	100 to 400	401 to 700	701 to 1000	1001 to 1300	>1300
		Loss of Private Land Ownership	Area of private lands	ha	<10	10 to 20	21 to 30	31 to 40	41 to 50	>50
	Human Health and Public Safety	Fugitive Dust	Qualitative scale		Excellent - Conventional slurry tailings with a small footprint (<113 ha) and short distance to processing facility (<1 km)	Very Good - Conventional slurry tailings with a small footprint (<113 ha) or a short distance to the processing facility (<1 km)	Good - Conventional slurry tailings with a large footprint (>122 ha) and large distance to processing facility (>5 km)	Fair - Filtered tailings with a small footprint (<113 ha) and small distance to processing facility (<1 km)	Poor - Filtered tailings with a small footprint (<113 ha) or small distance to processing facility (<1 km)	Very Poor - Filtered tailings with a large footprint (<122 ha) and large distance to processing facility (<5 km)
		Hazard Potential to the Public	Qualitative scale	_	Excellent - Filtered tailings water management ponds located over 3 km from Fifteen Mile Stream.	Very Good - Filtered tailings water management ponds located less than 3 km from Fifteen Mile Stream.	Good - Conventional slurry tailings located over 3 km from Fifteen Mile Stream.	Fair - Conventional slurry tailings located between 1 and 3 km from Fifteen Mile Stream.	Poor - Conventional slurry tailings located between 1 and 3 km from Fifteen Mile Stream, with infrastructure potentially impacted.	Very Poor - Conventional slurry tailings located over 3 km from Fifteen Mile Stream.
		Risk to Workers	Qualitative scale	_	Excellent – Conventional slurry TMF located remote (>2 km) from mine workings and a low dam height (<35 m)	Very Good – Conventional slurry TMF located near (<2 km) mine workings or with high dams (>35 m)	Good – Conventional tailings TMF located near (<2 km) mine workings and with high dams (>35 m)	Fair - Filtered tailings TMF located remote (>2 km) from mine workings and a low dam height (<35 m)	Poor – Filtered stack TMF located near (<2 km) mine workings or with high dams (>35 m)	Very Poor – Conventional slurry tailings located less than 3 km from Fifteen Mile Stream, with infrastructure potentially impacted.
	Operational Impact	Change in Aesthetics / Visual Impacts	Qualitative scale	-	<25	25.0 to 28.0	28.1 to 32.0	32.1 to 35.5	35.6 to 39.1	>39.1
		Noise Emissions	Distance from TMF to receptor	m	>7,750	7,251 to 7,750	6,751 to 7,250	6,251 to 6,750	5,750 to 6,250	<5,750
	Local Economic Risk	Loss of Local Jobs and Business Opportunities	Qualitative scale	_	Excellent – The capital and operational costs associated with the TMF are substantially less than the base case and highly resilient to large	Very Good – The capital and operational costs associated with the TMF are less expensive than the base case and it is unlikely that large fluctuations in	Good – The capital and operational costs associated with the TMF are not different then the base case and would not be susceptible to large gold price	Fair – The capital and operational costs associated with the TMF are slightly more expensive then the base case and the mine may be potentially	Poor – The capital and operational costs associated with the TMF are more expensive then the base case and there is the possibility that the mine would be	Very Poor – The capital and operational costs associated with the TMF are significantly higher than the base case and it is highly likely that the





A	Cub Assount	Indicator	Parameter Unit		indicator Value					
Account	Sub-Account	Indicator			6 (Highest)	5	4	3	2	1 (Lowest)
					fluctuations in	gold price would	fluctuations, which	susceptible to	susceptible to	mine would be
					gold price	result in	could result in	moderate gold	minor fluctuations	susceptible to
						temporary care	temporary care	price fluctuations,	in gold price,	minor fluctuations
						and maintenance	and maintenance	which would result	which would result	in gold price,
							until prices	in temporary care	in temporary care	which would result
							improve	and maintenance	and maintenance	in a forced
								probable until	until gold prices	shutdown and
								gold prices	increase	early mine closure
								improve		likely





Table 7: Multiple Accounts Analysis Values

Environment Water Qualty Water Tearment Requirements 4 5 2 6 1 3 2 Hydrology Catchment Impacted 6 1 1 2 2 4 6 1 Aquaits Resources Loss of Fish Hubits Investrbacki 6 5 4 4 6 1 Number of Americed Sub-waterbacki 6 5 4 6 6 6 6 6 6 6 6 6 1 1 6 6 6 6 6 1							Indicator Value			
Heading for Water Tertment and Rocycle 3 2 5 4 5 2 Hydrology Carchment impacted 6 1 1 2 2 4 Number of Affected Sub-waterhed 6 5 5 4 4 6 Aquitic Resources Loss of Fish Habitat (wateroody) 1 6 6 6 6 1 1 Loss of Fish Habitat (wateroody) 1 6 6 6 6 1 1 4 6 2 1	Account	Sub-Account	Indicator	Alternative A	Alternative B	Alternative C	Alternative D	Alternative E	Alternative F	Alternative G
Headbing for Water Treatment and Recycle 3 2 5 4 5 2 Hydrology Catchment Impaced 6 1 1 2 2 4 Aquatic Resources Loss of Fish Habitat (Waterbody) 1 6 6 6 6 6 6 1 1 2 2 4 6 6 1 1 1 4 6 5 4 4 6 5 1 1 4 6 5 1	Environment	Water Quality	Water Treatment Requirements	4	5	2	6	1	3	5
Hydrology Catchment Impacted 6 1 1 2 2 4 Aquatic Resources Number of Affected Su-watersheds 6 5 5 4 4 6 Aquatic Resources Loss of Fin Hubitat (watercoure) 3 5 4 6 6 6 6 6 6 6 6 6 6 6 6 6 6 6 6 6 6 6 7 7 6 6 6 6 6 6 6 6 6 6 6 6 6 6 7 <td></td> <td></td> <td>•</td> <td>2</td> <td>2</td> <td></td> <td></td> <td></td> <td>2</td> <td>2</td>			•	2	2				2	2
Induce of Affected Survatersheds 6 5 1 4 4 6 Aquair Resources 10ss of fish Habita (waterocurse) 3 5 4 6 6 6 1 7 Instruction of the stabilita (waterocurse) 3 5 1 1 4 6 2 7 Terrestrial Resources Loss of Wetland 5 1 1 4 6 2 7 Terrestrial Resources Loss of Wetland 6 1 3 3 4 1 1 Sensitive Species Loss of Amainal Moose Habitat 3 1 1 4 6 2 1			Recycle	3	2	5	4	5	2	2
Induct of Affected Sub-values/register 6 5 5 4 4 6 Aquatic Resources Loss of fish Habita (waterboarse) 3 5 4 6 6 6 7 Instruct of water cossings 2 6 6 6 6 6 7 7 Terrestrial Resources Loss of Wetland 5 1 1 4 6 2 7 Terrestrial Resources Loss of Fish Habita 6 1 3 3 4 1 1 Terrestrial Resources Loss of Maintal Mose Habita 3 1 1 4 6 2 7 Sensitive Species Loss of fisch Habitat 3 1 1 4 6 1		Hydrology	Catchment Impacted	6	1	1	2	2	4	1
Loss of Fish Habitat (water.course) 3 5 4 6 6 1 Terrestrial Resources Loss of Metand 5 1 1 4 6 2 6 Terrestrial Resources Loss of Disturbel Habitat 6 1 3 3 4 1 1 Fordprint 6 1 3 3 4 1 1 Sensitive Species Loss of Manhand Moose Habitat 3 1 1 4 6 1 3 Atmospheric Emissions Fugitive Dust 5 5 2 6 3 4 1 Noise Emissions 6 1 1 4 6 2 2 3 4 Hazard Potential to the Magnitude of Falure 2 2 5 1 1 1 6 1 1 1 6 1 1 1 6 1 1 1 6 1 1 1 1 6 1 <td></td> <td></td> <td>Number of Affected Sub-watersheds</td> <td>6</td> <td>5</td> <td>5</td> <td>4</td> <td>4</td> <td>6</td> <td>5</td>			Number of Affected Sub-watersheds	6	5	5	4	4	6	5
Image Number of new crossings 2 6 6 6 6 6 1 Terestrial Resources Loss of Welland 5 1 1 4 6 2 Use of Disturbed Habitat 6 1 3 3 4 1 1 Ensitive Species Loss of Mainland Moose Habitat 3 1 1 4 6 2 Atmospheric Emissions Loss of Forest 5 5 2 6 3 4 1 Noise Emissions 5 5 5 1 4 6 2 4 Noise Emissions 5 5 1 4 2 4 4 Noise Emissions 6 1 2 1 1 6 1 1 6 1 1 1 6 1 1 1 6 1 1 1 1 1 1 1 1 1 1 1 1 <t< td=""><td></td><td>Aquatic Resources</td><td>Loss of Fish Habitat (waterbody)</td><td>1</td><td>6</td><td>6</td><td>6</td><td>6</td><td>5</td><td>6</td></t<>		Aquatic Resources	Loss of Fish Habitat (waterbody)	1	6	6	6	6	5	6
Terestrial Resources Loss of Welland 5 1 1 4 6 2 Lise of Distribed Habitat 6 1 3 3 4 1 1 Footprint 6 1 3 3 4 1 1 Loss of Forest 6 1 3 3 4 1 1 Loss of Mailand Moose Habitat 3 1 1 4 6 2 1 Atmospheric Emissions Fugithy Out 5 5 2 6 3 4 1 Moise Emissions 5 5 1 4 2 4 1 Hazard Potential to the Environment Magnitude of Failure 2 2 5 1 5 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 1 1 1 6 1 2 2			Loss of Fish Habitat (watercourse)	3	5	4	6	6	1	6
Burger of Statubed Habitat 6 1 2 1 </td <td></td> <td></td> <td>Number of new crossings</td> <td>2</td> <td>6</td> <td>6</td> <td>6</td> <td>6</td> <td>4</td> <td>6</td>			Number of new crossings	2	6	6	6	6	4	6
Footprint 60 1 3 3 4 1 Sensitive Species Loss of Mainland Moose Habitat 3 1 1 4 6 2 Atmospheric Emissions Fugitive Dust 5 5 2 6 3 4 1 Atmospheric Emissions Fugitive Dust 5 5 2 6 3 4 1 Order Emissions Fortected Areas Proximity to Protected Areas 6 1 1 4 2 4 Hazard Potential to the Environment Magnitude of Falure 2 2 5 1 5 2 6 1 1 6 1 1 1 6 1 1 1 6 1 1 1 1 6 1		Terrestrial Resources	Loss of Wetland	5	1	1	4	6	2	4
Loss of Forest 6 1 3 3 4 1 Sensitive Species Loss of Brook Trout Habitat 3 1 1 4 6 2 Atmospheric Emissions Fugitive Dust 5 5 2 6 3 4 Atmospheric Emissions Fugitive Dust 5 5 1 4 2 4 Protected Areas 6 1 2 1 1 6 1 Hazard Potential to the Environment Magnitude of Failure 2 2 5 1 5 2 Design Factors Storage to Dam Volume Ratio 4 2 1 1 6 1 1 6 1 1 6 1 1 6 1 1 6 1 1 6 1 1 1 6 1 1 1 6 1 1 1 6 1 1 1 1 1 1 1 1			Use of Disturbed Habitat	6	1	2	1	1	1	5
Sensitive Species Loss of Mainland Moose Habitat 3 1 1 4 6 2 1 Atmospheric Emissions Fugitive Dust 5 5 2 6 3 4 Atmospheric Emissions Fugitive Dust 5 5 1 4 2 4 GHG Emissions 66 1 2 1 1 6 1 Protected Areas Proximity to Protected Areas 6 1 1 1 2 3 1 Hazard Potential to the Environment Downstream Sensitivities 1 4 6 2 5 2 1 1 6 2 2 5 1 5 2 1 1 1 6 1 1 1 6 1 1 1 1 1 1 6 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 <t< td=""><td></td><td></td><td>Footprint</td><td>6</td><td>1</td><td>3</td><td>3</td><td>4</td><td>1</td><td>4</td></t<>			Footprint	6	1	3	3	4	1	4
Instrument Loss of Brook Trout Habitat 3 5 4 6 6 1 Atmospheric Emissions Fugitive Dust 5 5 2 6 3 4 Atmospheric Emissions Fugitive Dust 5 5 1 4 2 4 Noise Emissions 66 1 2 1 1 6 6 Protected Areas Provinity to Protected Areas 6 1 4 6 2 3 6 Hazard Potential to the Environment Magnitude of Fallure 2 2 5 1 5 2 Design Factors Storage to Dam Volume Ratio 4 2 1 1 1 6 6 Natural Topographic Containment 3 4 3 4 4 5 6 <t< td=""><td></td><td></td><td>Loss of Forest</td><td>6</td><td>1</td><td>3</td><td>3</td><td>4</td><td>1</td><td>4</td></t<>			Loss of Forest	6	1	3	3	4	1	4
Atmospheric Emissions Fugitive Dust GHG Emissions 5 5 1 4 2 4 ChG Emissions 6 1 2 1 1 6 Protected Areas Proximity to Protected Areas 6 1 2 1 1 6 Hazard Potential to the Environment Magnitude of Failure 2 2 5 1 5 2 Technical Design Factors Storage to Dam Volume Ratio 4 2 1 1 1 6 Dawn Volume 5 1 1 1 1 6 1 Technical Design Factors Storage to Dam Volume Ratio 4 2 1 1 1 6 1 Matural Topographic Containment 3 4 3 4 4 5 1 2 1 6 1 1 4 4 6 1 1 4 1 1 1 6 1 1 1 1		Sensitive Species	Loss of Mainland Moose Habitat	3	1	1	4	6	2	5
GHG Emissions 5 5 1 4 2 4 Protected Areas Protected Areas 6 1 2 1 1 6 1 Hazard Potential to the Environment Magnitude of Failure 2 2 5 1 5 2 Technical Design Factors Storage to Dam Volume Ratio 4 6 2 5 2 1 6 1 6 1 1 6 1 1 6 1 1 6 1 1 1 6 1 1 1 6 1 1 1 6 1 1 1 6 1 1 1 6 1 1 1 6 1<			Loss of Brook Trout Habitat	3	5	4	6	6	1	6
Noise Emissions 6 1 2 1 1 6 Protected Areas Proximity to Protected Areas 6 1 1 1 2 3 Hazard Potential to the Environment Magnitude of Failure 2 2 5 1 5 2 Technical Design Factors Starage to Dam Volume Ratio 4 2 1 1 1 6 1 Safety Factors Dom Volume 5 1 1 1 1 6 1 Safety Factors Monitoring Requirements 2 2 1 1 1 6 1 Monitoring Requirements 2 2 1 1 4 5 1 1 4 6 1 1 4 5 1 2 6 1 1 4 1 1 1 4 1 1 1 1 1 1 1 1 1 1 1 1 1 </td <td></td> <td>Atmospheric Emissions</td> <td>Fugitive Dust</td> <td>5</td> <td>5</td> <td>2</td> <td>6</td> <td>3</td> <td>4</td> <td>6</td>		Atmospheric Emissions	Fugitive Dust	5	5	2	6	3	4	6
Protected Areas Proximity to Protected Areas 6 1 1 1 2 3 Hazard Potential to the Environment Magnitude of Failure 2 2 5 1 5 2 Technical Design Factors Storage to Dam Volume Ratio 4 6 2 5 2 6 Natural Topographic Containment 3 4 3 4 4 6 1 1 6 6 Safety Factors Monitoring Requirements 2 2 1 1 2 6 6 Impoundment Configuration 4 5 1 2 6 2 5 2 6 7 6			GHG Emissions	5	5	1	4	2	4	4
$ \begin{array}{ c c c c c c c c c c c c c c c c c c c$			Noise Emissions	6	1	2	1	1	6	2
$ \begin{array}{ c c c c c c c c c c c c c c c c c c c$		Protected Areas	Proximity to Protected Areas	6	1	1	1	2	3	1
Technical Design Factors Storage to Dam Volume Ratio 4 2 1 1 1 6 Dam Volume 5 1 1 1 1 6 0 Natural Topographic Containment 3 4 3 4 4 5 0 Safety Factors Monitoring Requirements 2 2 1 1 2 6 0 Dam Height 4 4 4 6 1 1 4 4 Impoundment Configuration 4 5 1 2 1 6 0 Water Management 5 5 2 6 2 5 0		Hazard Potential to the	Magnitude of Failure	2	2	5	1	5	2	2
Dam Volume 5 1 1 1 1 1 6 Natural Topographic Containment 3 4 3 4 4 5 5 Safety Factors Monitoring Requirements 2 2 1 1 2 6 6 Dam Height 4 4 6 1 1 4 6 Dam Height 4 4 6 1 2 6 6 Contaminant Management 5 5 2 6 2 5 6 Water Management Length of Sepage Ditching 3 5 3 3 1 6 Number of Pumps and Pipelines 2 5 2 4 4 1 Impacts to Annual Water Balance 5 3 1 5 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1		Environment	Downstream Sensitivities	1	4	6	2	5	2	4
$ \frac{1}{1} 1$	Technical	Design Factors	Storage to Dam Volume Ratio	4	2	1	1	1	6	1
Safety Factors Monitoring Requirements 2 2 1 1 2 6 1 Dam Height 4 4 6 1 1 4 4 Impoundment Configuration 4 5 1 2 1 6 1 Water Management 5 5 2 6 2 5 1 Water Management Length of Seepage Ditching 3 5 3 3 1 6 1 Impacts to Annual Water Balance 5 3 1 5 5 1 2 1 6 1		_	Dam Volume	5	1	1	1	1	6	1
$ \begin{array}{ c c c c c c c c c c c c c c c c c c c$			Natural Topographic Containment	3	4	3	4	4	5	3
$ \begin{array}{ c c c c c c c c c c c c c c c c c c c$		Safety Factors	Monitoring Requirements	2	2	1	1	2	6	1
Contaminant Management552625Water ManagementLength of Seepage Ditching353316Number of Pumps and Pipelines252441Impacts to Annual Water Balance531551Reclaim Water Return154561Final Embankment ConfigurationFinal Embankment Construction Compliance with Environmental Approvals462524Complexity of OperationsTailings Disposal5626346Complexity of OperationsTailings Disposal5625244Distance from the Mill166611511Elevation from the Mill611115511			Dam Height	4	4	6	1	1	4	2
Water ManagementLength of Seepage Ditching353316Number of Pumps and Pipelines252441Impacts to Annual Water Balance531551Reclaim Water Return154561Final Embankment ConfigurationFinal Embankment Construction Environmental Approvals453266Complexity of OperationsFailings Disposal5625244Processing Complexity4525244Distance from the Mill1666115			Impoundment Configuration	4	5	1	2	1	6	1
Number of Pumps and Pipelines252441Impacts to Annual Water Balance531551Reclaim Water Return154561Final Embankment ConfigurationFinal Embankment Construction453266Compliance with Environmental ApprovalsEase of Obtaining Initial Permits462524Complexity of OperationsTailings Disposal562634Processing Complexity452524Distance from the Mill166611Elevation from the Mill611151			Contaminant Management	5	5	2	6	2	5	4
Impacts to Annual Water Balance531551Reclaim Water Return1545611Final Embankment ConfigurationFinal Embankment Construction4532666Compliance with Environmental ApprovalsEase of Obtaining Initial Permits4625246Complexity of Operations Distance from the Mill562634626116611115111511111511115111		Water Management	Length of Seepage Ditching	3	5	3	3	1	6	2
Reclaim Water Return154561Final Embankment ConfigurationFinal Embankment Construction453266Compliance with Environmental ApprovalsEase of Obtaining Initial Permits462524Complexity of OperationsTailings Disposal5626346Processing Complexity4525246Distance from the Mill166611661Elevation from the Mill611115524			Number of Pumps and Pipelines	2	5	2	4	4	1	5
Final Embankment ConfigurationFinal Embankment Construction453266Compliance with Environmental ApprovalsEase of Obtaining Initial Permits462524Complexity of OperationsTailings Disposal5626346Processing Complexity452524616611156611115666111 <td< td=""><td></td><td></td><td>Impacts to Annual Water Balance</td><td>5</td><td>3</td><td>1</td><td>5</td><td>5</td><td>1</td><td>6</td></td<>			Impacts to Annual Water Balance	5	3	1	5	5	1	6
ConfigurationConfigurationA532666Compliance with Environmental ApprovalsEase of Obtaining Initial Permits4625244Complexity of Operations Distance from the Mill5626344Processing Complexity4525244Distance from the Mill1666614Elevation from the Mill611155555			Reclaim Water Return	1	5	4	5	6	1	5
Compliance with Environmental ApprovalsEase of Obtaining Initial Permits462524Complexity of Operations Processing ComplexityTailings Disposal5626346Processing Complexity452524616661166611151115115115115111511151115111511151111511 </td <td></td> <td></td> <td>Final Embankment Construction</td> <td>4</td> <td>5</td> <td>3</td> <td>2</td> <td>6</td> <td>6</td> <td>1</td>			Final Embankment Construction	4	5	3	2	6	6	1
Complexity of OperationsTailings Disposal562634Processing Complexity452524Distance from the Mill166661Elevation from the Mill611155		Compliance with	Ease of Obtaining Initial Permits	4	6	2	5	2	4	4
Processing Complexity 4 5 2 5 2 4 Distance from the Mill 1 6 6 6 1 1 Elevation from the Mill 6 1 1 1 5 2 4			Tailings Disposal	5	6	2	6	3	4	6
Distance from the Mill 1 6 6 6 1 Elevation from the Mill 6 1 1 1 5										5
Elevation from the Mill61115				1					1	6
				6	1	1	1	1	5	1
					5	2	5	3		5
		Constructability		•					1	6
				1					1	3





						Indicator Value			
Account	Sub-Account	Indicator	Alternative A	Alternative B	Alternative C	Alternative D	Alternative E	Alternative F	Alternative G
Economics	Total TMF Costs	Initial Capital Costs	5	6	1	5	1	4	6
		Sustaining Capital Costs	4	3	1	2	4	6	1
		Operating Costs	6	6	1	6	1	6	6
		Closure Costs	6	4	6	5	6	1	6
		Post-Closure Costs	2	3	1	1	2	6	1
		Ancillary Costs	3	4	4	5	5	1	6
	Economic Risks	Projected Timeline for Permits	1	6	1	4	1	1	1
		Projected Timeline for Start of Operations	4	6	2	5	2	4	4
Socioeconomics	Land Use	Loss of Recreational Fishing	1	4	4	4	5	1	6
		Loss of Commercial Forest Harvesting	6	4	6	4	4	1	4
		Loss of ATV Trails	6	2	2	1	4	1	3
		Loss of Private Land Ownership	2	6	6	6	6	1	6
	Human Health and Public	Fugitive Dust	5	5	2	6	3	4	6
	Safety	Hazard Potential to the Public	1	4	6	2	5	2	4
		Risk to Workers	6	6	4	5	1	6	5
	Operational Impact	Change in Aesthetics / Visual Impacts	4	4	6	1	1	4	2
		Noise Emissions	6	1	2	1	1	6	2
	Local Economic Risk	Loss of Local Jobs and Business Opportunities	4	4	1	3	1	5	3





Table 8: Sub-Accounts and Indicators Weightings and Rationale

Account	Weight	Sub-Account	Weight	Sub-Account Weight Rationale	Indicator	Weight	Indicat
Environment	6	Water Quality	5	Ensuring local water quality is not significantly adversely affected by the deposition of tailings is of overriding environmental concern when designing a TMF. Tailings effluent requires management to meet discharge criteria and prevent effects to receiving waters. A weight of five was assigned.	Water Treatment Requirements	6	Water treatment for the conver tailings pond as sunlight and ver and ammonia residuals and sus volume have a longer residency stack alternatives will require a flows are treated in accordance was assigned.
		Hydrology			Flexibility for Water Treatment and Recycle	2	Alternatives which could pump water management ponds will before discharge to the enviror greatly improve the residency t treatment for pH and metals. C capacity to manage excess or in could affect water quality. A low
		Hydrology3Aquatic Resources6	The hydrology of the area and how the TMF will affect the natural drainage of a region is extensively considered when designing the TMF. Alternatives can directly overprint watercourses that are important for the drainage of the region,	Catchment Impacted	5	The potential to negatively affer in adjacent watercourses due to fish and fish habitat and as a re	
				and will alter catchment areas, reducing the quantity of water reporting to nearby watercourses and waterbodies. However, mitigation measures can be implemented to reduce the overall effects to the regional hydrology, such as watercourse realignments, and this sub-account was not considered as influential to the environmental effects of the Project as some of the other subaccounts. A moderately low weight of three has been assigned.	Number of Affected Sub-watersheds	5	Alternatives that overprint a su challenges from a water manag increased technical difficulties i for a larger water quality monit with the MDMER. A moderate v
				Fish and fish habitat is protected Federally under the <i>Fisheries</i> <i>Act</i> , and is regulated in the MDMER so that no net loss of fish habitat will occur as a result of the Project. However, natural fish habitat will be affected to differing severities by each of the alternatives depending on the amount and type of fish habitat lost or altered. Because of the importance placed on fish habitat by Federal legislation and it is the overarching reason for this assessment of alternatives, a maximum weight	Loss of Fish Habitat (waterbody)	5	Although one of the primary de frequented by fish, due to the l some of the alternatives would tributaries and creeks. Waterco ecologically productive than po number of aquatic species. For been assigned for watercourse
				of six has been assigned.	Loss of Fish Habitat (watercourse)	6	Some alternatives would overp high weight of six has been ass
					Number of Watercourse Crossings	3	Haul roads and pipelines that c have localized effects to the en characteristics. Additionally, vel can further exacerbate the effe vibration and by road material

cator Weight Rationale

ventional slurry alternatives will occur in the d volatilization processes break down cyanide suspended solids settle. Ponds with more ncy time to allow more treatment. The filtered e a water treatment plant to ensure the larger nce with discharge criteria. A high weight of six

np excess water from the tailings pond to other rill allow extra aging and water treatment ronment. The addition of additional ponds will cy time of tailings effluent and allow batch c. Conversely, alternatives that do not have or inventories are prone to situations which low weight of two was assigned.

ffect hydrologic environment by reducing flows e to a reduced catchment area, could reduce result, a high weight of five was assigned.

sub-watershed divide will have added technical nagement perspective. There would be es in seepage collection as well as the potential nitoring program to demonstrate compliance the weight of five has been assigned.

design criteria for the TMF was to avoid waters le large quantity of surface water in the area, ald overprint watercourses in the form of course fish habitat is considered to be more ponds and provides spawning areas for a large for these reasons, a high weight of five has se fish habitat removal.

erprint waterbodies provides habitat for fish. A assigned for waterbody fish habitat removal.

t cross watercourses around the Project could embankment, channel and substrate vehicle traffic over the watercourse crossings ffects to fish habitat during operations by ial migrating into the watercourse. However,





Account	Weight	Sub-Account	Weight	Sub-Account Weight Rationale	Indicator	Weight	Indica
							watercourse crossings are con than a direct loss of habitat, as within those watercourses. The moderate weight of three has
		Terrestrial Resources	2	Due to no viable options for the tailings to be deposited underground in former mine workings, surface impoundment of the tailings is required. This requires that large areas of terrestrial habitat are overprinted based on the required size of the TMF. Due to the regional abundance of terrestrial habitat available compared to aquatic habitat, and different Federal	Loss of Wetland	5	Wetland habitat has a high eco and generally contains a large found in wetland environment reflect the overall productivity area of wetland loss for some
				and Provincial legislation placed on terrestrial habitat, a low weight of two has been assigned.	Use of Disturbed Habitat	6	Recently disturbed lands have other ecosystems and are ove conditions. Alternatives that o and as a result, a high weight
					Footprint	3	Alternatives that are located d segregate habitat corridors, ex likelihood of vehicle collisions distances and physical barriers been assigned.
					Loss of Forest	5	Forests represent good quality flora and have a high ecologic abundance of forest habitat in weight of five has been assign
		Sensitive Species	3	A weight of three was assigned as species of special concern have been observed near the Project and several sensitive species occur within the footprint of one of the alternatives.	Loss of Mainland Moose Habitat	4	Mainland Moose have been of forage for aquatic vegetation Moose are listed as Endangere weight of four has been assign
					Loss of Brook Trout Habitat	6	As Brook Trout are of great so Scotia's most important sports Mi'kmaq of Nova Scotia, a hig indicator.
		Atmospheric Emissions	4	During construction and operations of the TMF, the alternatives will vary in their air quality and noise emissions to the surrounding environment. The TMF will be a contributor to the fugitive dust, GHG emissions, and noise that is produced as a result of the Project. From an environmental perspective, the effects of air quality and noise will be small in comparison to some of the other sub-accounts. However, based on the importance of these effects to a localized and global scale	Fugitive Dust	6	Fugitive dust can be produced mechanically disturbed by air nearby vegetation, waterbodie aquatic and terrestrial habitat would produce large quantitie be difficult to mitigate comple to reflect the potential amoun resulting environmental effect

onsidered to have less effects to fish habitat as there would be available habitat remaining Therefore, relative to the other indicators, a as been assigned.

ecological value relative to other habitat types, ge variety of fauna and flora that can only be ents. A high weight of five has been assigned to ity of wetland environments, as well as the large ne of the alternatives.

ve a relatively low ecological value compared to verrepresented relative to pre-industrial t overprint recently disturbed land are preferred, in thas been assigned to this indicator.

d distant from the ore processing plant will extend other Project effects, and increase the ns with wildlife through increased haul road ers. As a result, a moderate weight of three has

lity habitat for many native terrestrial fauna and gical value. However, due to the overall : in the area compared to wetland habitat, a high gned.

o observed near the Project site where they on within wetlands during the summer. Mainland ered through the Provincial ESA. A moderate igned to this indicator.

social importance recreationally as one of Nova orts fish and is also an important fish for the high weight of six has been assigned to this

ted from TMFs when exposed tailings are air currents. This fugitive dust can deposit on dies, and watercourses and can degrade the at of the areas affected. Some alternatives ties of fugitive dust, of which the effects would pletely. A high weight of six has been assigned unt of fugitive dust being produced and the ects.





Account	Weight	Sub-Account	Weight	Sub-Account Weight Rationale	Indicator	Weight	Indica
				from an environmental perspective, a moderate weight of four has been assigned.	GHG Emissions	5	Atlantic recognizes the import change effects on a global sca will be very small compared to given the national priority, a r indicator.
					Noise Emissions	3	Activities from the construction the potential to increase amb can be disruptive to wildlife a However, as this indicator wo not expected to extend far from been assigned.
		Protected Areas	1	The Project and the TMF alternatives are located in proximity to several wilderness areas. The regional boundary avoided alternatives that directly affected these protected areas. As only indirect effects remain, a very low weight of one was assigned.	Proximity to Protected Areas	1	There is only one indicator in was assigned.
		Hazard Potential to the Environment	6	The hazard potential of the TMF has been assessed from an environmental perspective on the potential environmental damage that could occur in the unlikely event of a TMF failure. As a result, a high weight of six has been assigned.	Magnitude of Failure	2	As the alternatives will utilize to content which would reduce to TMF would be constructed to regardless of the alternative., to indicator.
					Downstream Sensitivities	6	The potential environmental e impact sensitive downstream been assigned.
Technical	3	Design Factors	3	Design factors include some of the key factors that contribute to technical complexity of the TMF alternatives. Alternatives that are less technically challenging are generally preferred. A moderate weight of three has been assigned to reflect the importance of design factors.	Storage to Dam Volume Ratio	4	Storage to dam volume ratio designing and locating a TMF transported via pipeline. A mo reflect the importance of an e utilizes natural topography, w requirements of the TMF.
					Dam Volume	6	Dam volume considers the nu dams required for a particular preferred as it reduces constr weight of six was assigned.
					Natural Topographic Containment	2	From a technical perspective, sited to take advantage of na A low weight of two was assig

ortance of GHG reduction to slow climate scale. Although GHG emissions from the Project I to total emissions in Nova Scotia and Canada, a moderate weight of two was given to this

tion of the TMF and deposition of tailings have abient sound levels. Increased ambient sound and potentially deter wildlife from the area. yould affect certain wildlife and the effects are from the TMF, a moderate weight of three has

in this sub-account, therefore a weight of one

te tailings deposition with a higher solids e the magnitude of any potential failure, and the to meet all appropriate factors of safety e., a low weight of two was given to this

l effects in the unlikely event of a failure could m habitats. As a result, a high weight of six has

o is one of the primary considerations when AF for conventional slurry or thickened tailings moderate weight of four has been assigned to efficient TMF location and site layout that which would greatly reduce the construction

number, length and height of the combined lar alternative. Minimizing the dam volume is struction and operational risks. As a result, a high

e, and for long term stability, TMFs should be natural topographic containment when possible. signed.





Account	Weight	Sub-Account	Weight	Sub-Account Weight Rationale	Indicator	Weight	Indica
	Safety Facto	Safety Factors	6	Safety is a primary concern when designing the TMF and each alternative can be constructed to the necessary factor of safety. However, some technical factors have the potential to increase the risk or consequence of failure and should therefore be avoided. As a result, a high weight of six has been assigned.	Monitoring Requirements	3	Atlantic will be required to mo until the regulatory authority h further monitoring is required. the safety risk, thereby requirin and are less preferred. A mod
					Dam Height	6	The height of the TMF is gene stored in the tailings and recla damage in the unlikely event of increases the energy required for construction and the energy the dams. Although a greater weight of six was therefore as
					Impoundment Configuration	6	Dams are ideally constructed I straight line. When a dam is re weaker areas more prone to fa partially offset by building larg A high weight of six was assign
					Contaminant Management	5	Alternatives will be required by contaminates such as fugitive high levels of contaminates. A concepts to ensure that all app Alternatives that have greater manage these conditions. As a
		Water Management	5	One of the primary considerations taken into account when designing the TMF is the ability to manage water within and around the facility to comply with the MDMER seepage collection requirements and maintain a water inventory for ore processing. Some alternatives have complex or extensive seepage collection infrastructures that can increase the difficulty of MDMER compliance. A high weight of five has been assigned to this sub-account to reflect the importance	Length of Seepage Ditching	5	During the construction phase required around the TMF for c collection ditching and seepag of ponds and the length of the complexity of capturing all the likelihood of seepage evading weight of five has been assign
				water management has on the Project.	Number of Pumps and Pipelines	3	Alternatives equipped with a r ditching and pumping, will be supernatant pond for reuse or manage, will have more pump result, a moderate weight of th
					Impacts to Annual Water Balance	3	Alternatives with tailings dewa will result in additional water r Alternatives with increased qu be avoided. A moderate weigh

monitor and maintain the TMF following closure by has deemed the site remediated and no ed. Alternatives with more dams will increase iring additional monitoring during operation oderate weight of three was assigned.

nerally proportional to the potential energy claim pond and has the potential to cause more at of a dam break. Additionally, the height ed to haul the fill material to the top of the dams ergy for pumping to deposit the tailings over er dam height is not desirable, and a high assigned.

d between two areas of high ground in a required to bend, such as in perimeter dam, failure develop at the bends. This can be arger dams with more buttressing in these areas. signed.

I by provincial approvals to manage ve dust that contain metals, and effluent with . Alternatives will require water treatment applicable discharge criteria are met. er water storage capacity are better able to .s a result, a high weight of five was assigned.

ase, seepage collection infrastructure would be or compliance with MDMER and would include bage collection ponds. The greater the number the collection ditching, the greater the the seepage from the TMF and increasing the ng the collecting system. A moderately high gned.

a runoff collection system, such as perimeter be used to manage water in the tailings or treatment. Alternatives with more water mps and pipelines to maintain and operate. As a f three was assigned.

watering processes or larger catchment areas er requiring treatment and management. quantities of water requiring treatment should ight of three was assigned.





I	Account	Weight	Sub-Account	Weight	Sub-Account Weight Rationale	Indicator	Weight	Indica
						Reclaim Water Return	6	Each alternative will require the the seepage collection ponds ore processing plant to be used water management approach There will be technical challen required to be pumped back to additional sumps and a longer of six has been assigned.
			Final Embankment Configuration	2	Additional ore could be identified in the vicinity of the Project that is economically viable for Atlantic to pursue. It would be technically advantageous to expand the existing TMF structure either vertically or laterally as opposed to constructing a new TMF that overprints more undisturbed habitat and surface water and that requires new access infrastructure. A low weight of two has been assigned to this indicator.	Final Embankment Construction	6	Alternatives with a smaller inc more easily support expansior additional resources are devel
			Compliance with Environmental Approvals	5	The chosen alternative would need to complete provincial regulatory processes prior to use and would need to comply with all environmental approvals. Alternatives with environmental approvals that are expected to be technically challenging to comply with could result in Atlantic being in noncompliance. As a result, a high weight of five was assigned.	Ease of Obtaining Initial Permits	1	There is only one indicator in twas assigned.
			Complexity of Operations	4	Alternatives that use a design that is unconventional or unprecedented at the required Project scale are inherently more complex to operate. This may result in unforeseen problems and significant intervention during operations. A moderate weight of four has been assigned to reflect the inherent challenges with different technologies.	Tailings Disposal	6	The level of effort required in consideration when designing depositing tailings, the more s problems and plant downtime intervention to deposit tailing perspective. As a result, a high
						Processing Complexity	5	Alternatives that require frequ and creates more susceptibilit and plant downtime. As a res
						Distance from the Mill	5	Alternatives that are situated f greater transportation infrastr of incurring technical challeng crossings, steep hills, etc.). The and a high weight of five was
						Elevation from the Mill	3	The elevation differential betw proportional to the effort and A moderate weight of three w

that the seepage and runoff collected in either ds or the reclaim pond be pumped back to the used in processing to maintain a closed-loop ch and to reduce water taking from elsewhere. enges associated with the distance water is k to the ore processing plant for use, including ger reclaim pipeline to maintain. A high weight

ncremental addition to the embankment will ion and allow more flexibility in the event veloped. A high weight of six was assigned.

n this sub-account, therefore a weight of one

in depositing tailings in the TMF is a key ng alternative. The more complex the process of e susceptible the Project is to unforeseen me. Alternatives that require infrequent ngs in the TMF are preferred from a technical gh weight of six was assigned.

quent intervention are more complex to operate ility for the Project due to unforeseen problems esult, a high weight of five was assigned.

d further from the ore processing plant have structure requirements, and increased likelihood nges with the surrounding terrain (e.g. river These factors increase the level of complexity, as assigned.

etween the alternative and the mill is nd complexity of operations to transport tailings. was assigned.





Account	Weight	Sub-Account	Weight	Sub-Account Weight Rationale	Indicator	Weight	Indica
					Climatic Challenges	4	Climatic challenges such as sig impact the operation of filtered disruptive in winter, particular Haul trucks must run regularly materials at the filtration plant haul cycles during white out c application in thinner layers an compaction specifications in f delayed by typical winter weat to reflect climatic challenges.
		Constructability	4	The primary considerations when designing a TMF is the construction suitability. Alternatives that are difficult to construct will have much greater impacts to the Project schedule and can cascade into effects to other accounts and sub-accounts. The moderate weight of four has been assigned	Material Availability	4	This indicator refers to the eas resources needed to construct require securing or manufactu material. A moderate weight c
				to this sub-account.	Foundation Suitability	6	Foundation suitability is the p locating a TMF facility from a on bedrock or foundation with challenging to mitigate agains ensure appropriate dam stabi been assigned to reflect the e
Project Economics	1.5	1.5 Total TMF Costs	6	Overall costs of constructing, operating and closing the alternative will have large influence on the preferred alternative. As a result, a maximum weight of six has been assigned to reflect the importance of controlling costs.	Initial Capital Costs	5	Initial capital costs to construct most sensitive costs as these of have a disproportionate influe Although each alternative is p with greater capex costs incur weight of five has been assign initial capital costs.
					Sustaining Capital Costs	4	Sustaining capital costs are get with alternatives that employ technologies. Impoundment of continuous dam raises during reached to allow for sufficient of the most expensive expend raises can be purchased throu sensitive, a slightly lower weig initial capital costs.
					Operating Costs	6	Operation costs are generally alternatives that employ filtered labour, and materials required filtered tailings via haul truck of Project economics. This is exp

significant precipitation and cold weather may ered tailings technologies which could be arly during storms and heavy snowfall events. rly to avoid stockpiling and double handling of ant, but blizzard conditions could interfere with t conditions. Filtered tailings technology requires and immediate compaction to meet n frozen conditions, and compaction could be eather. A moderate weight of four was assigned s.

ease of acquiring the aggregate and rockfill uct the TMF dams. Some of the alternatives may cturing new sources of transition and bedding t of four was assigned.

primary consideration when designing and a technical perspective, which is ideally situated vith high shear strength. It is very technically inst poor foundation for dam construction to bility, therefore the highest weight of six has e essential nature of this indicator.

ruct the TMF alternatives are expected to be the e expenses cannot be deferred to revenue and uence on the net present value of the Project. s potentially economically viable, alternatives ur substantial risk to Project economics. A high gned to reflect the importance of controlling

generally one of the greatest costs associated by conventional slurry tailings deposition t dams for these alternatives will undergo ng operations until the specified heights are nt tailings retention. This is expected to be one nditures of the Project, however as these dam ough revenue and are less economically eight of four has been assigned compared to

ly one of the greatest costs associated with ered tailings deposition technology. The energy, ed to dewater tailings, as well as transport k or conveyer can have substantial effects to xpected to be one of the most expensive





Account	Weight	Sub-Account	Weight	Sub-Account Weight Rationale	Indicator	Weight	Indica
							expenditures of the Project, al from revenue and are less eco of six has been assigned.
					Closure Costs	2	Atlantic is required to submit government prior to the comm Project. This financial assurance of implementing the closure p closure plan, if required. A low the relatively low cost of the fin and operation costs of the Pro-
					Post-Closure Costs	2	Post-closure costs were assess of the TMF until the provincial remediated. This work will be compared to other sub-accou post-closure costs.
					Ancillary Costs	4	Alternatives that overprint wat will require habitat offsets. The costs, and some alternatives w realignment channel. A moder reflect the habitat offset costs
		Economic Risks	4	Some of the alternatives bring inherent risk to Project economics, could result in schedule delays and risk overall Project viability. Compared to other cost factors, there is less certainty this will occur and as a result, a low weight of two was assigned.	Projected Timeline for Permits	6	Alternatives that could result i approvals, would delay Project a significant cost to Atlantic by Project. This risk is significant has been assigned.
					Projected Timeline for Start of Operations	5	Some of the TMF alternatives environmental requirements b could result in the delay in the having a significant cost to Atl As a result, a moderately high
Socioeconomics	3	Land Use	3	Atlantic is committed to minimizing or avoiding potential effects to Indigenous and the public's values as an integral part of Project development, along with balancing these values with the need for regional economic development. A	Loss of Fishing	2	Local residents may fish in war Project area. Although fishing would replace these areas and
				moderately low weight of three has been assigned.	Loss of Commercial Forest Harvesting	4	Merchantable timber from the and will be unavailable for for less effects to long term forest weight of six was assigned.

although these operational costs will come conomically sensitive. Regardless, a high weight

it reclamation security to the provincial mmencement of the construction phase of the ance will need to be sufficient to cover the costs e plan, such that a third party could carry out the ow weight of two has been assigned to reflect e financial insurance compared to capital costs Project.

essed as the monitoring and maintenance costs cial government has deemed the site adequately be routine and would be a very small cost ounts. A low weight of two has been assigned to

vatercourses and waterbodies frequented by fish These costs are lower than other TMF related s will have habitat offsetting included in a derate weight of four has been assigned to sts associated with the Project.

It in the delay or rejection of environmental ect construction and operations, and thus have by impacting the overall feasibility of the nt enough that a moderately high weight of six

es will have additional technical or s before proceeding with construction, which the commencement of operations, thereby Atlantic and the overall feasibility of the Project. gh weight of five has been assigned. waterbodies surrounding and throughout the ng opportunities may be lost, habitat offsetting nd a low weight of two was assigned.

the Project area will be overprinted by the TMF orestry. Alternatives with a smaller TMF will have estry in the Project vicinity. As a result, a high





Account	Weight	Sub-Account	Weight	Sub-Account Weight Rationale	Indicator	Weight	Indica
					Loss of ATV Trails	2	Several ATV trails runs throug valued areas but are being rea
					Loss of Private Land Ownership	2	Some of the lands in the area owned, and alternatives that or result in a loss of private land land use and the ability of Atla weight of two was assigned.
		Human Health and Public Safety	5	Atlantic recognizes that it is the utmost importance of avoiding the potential to harm human health and public safety. A potential loss of life or infringement to public safety is unacceptable and a high weight of five has been assigned.	Fugitive Dust	5	There is a risk that the area are health-based criteria for fugiti access restrictions. A moderate indicator.
					Hazard Potential to the Public	6	The TMF will be constructed to TMF failure is highly unlikely. was assessed to be the potent a TMF failure did occur. As a re assigned.
				Risk to Workers	6	TMF alternatives have the pote safety from exposure to fugitiv affect large areas and large nu and be more difficult to mana- the difficulty of managing wor worker injury during construct people a workplace incident co fugitive dust, the severity of po- an incident would be much gr been assigned.	
		Operational Impact	3	Project and TMF alternatives could affect enjoyment of the land, although the area is sparsely populated with infrequent land use. Some of these effects can be mitigated or compensated and a moderately weight of three has been assigned.	Change in Aesthetics / Visual Impacts	6	During the EA process, Indigen the importance of visual aesth elevation of the TMF was asse the TMF in lakes around the ir of the visual aesthetics of the multiple groups, a high weigh
					Noise Emissions	3	Noise from the TMF alternativ as well as in the general vicinit a nuisance to stakeholders and was not a concern extensively other operation impacts and a meet regulatory criteria, a mod assigned.

gh the Project area which provide access to ealigned. A low weight of two was assigned.

ea adjacent to the Project site are privately t overprint or encroach on these lands could ad ownership. However, due to the infrequent atlantic to compensate for this land, a low

around the TMF would exceed the human itive dust and these areas would have public ate weight of five has been assigned to this

to meet the necessary factors of safety and a . That stated, the hazard potential of the TMF ntial to affect infrastructure in the unlikely event result, a maximum weight of six has been

otential to increase the risk to worker health and itive dust coming off the TMF. This risk could numbers of personnel working around the TMF nage due to the spatial extent of the effect and vorker's use of PPE. Further, there is a risk of uction of the TMF. Although the number of t could affect is much smaller than the risk of potential injuries that could be sustained from greater. As a result, a high weight of six has

genous groups and local stakeholders identified sthetics of the natural landscape. The maximum sessed as being proportional to the visibility of immediate Project area. Due to the importance he Project on the natural landscape, identified by ght of six was assigned.

tives will be audible at some receptor locations, nity of the TMF. This noise could be considered and land users around the Project. Since noise ly identified by local stakeholders compared to a aesthetics from the Project, and the need to noderately low weight of three has been





Account	Weight	Sub-Account	Weight	Sub-Account Weight Rationale	Indicator	Weight	Indicat
		Local Economic	2	Due to the small size of the surrounding population,	Loss of Local Jobs	1	Alternatives that are more sense
		Risk		employment and business opportunities could impact the local	and Business		Canadian dollar have a higher
				economy. Should the Project enter a period of care and	Opportunities		these fluctuations. If the Projec
				maintenance or early closure, these economic opportunities			employment and business opp
				could be lost and could impact the local employment. A low			high weight of one was assigned
				weight of two has been assigned.			

ensitive to fluctuations in gold price and the er risk of shutting down the project during ject is placed in care and maintenance local opportunities would be significantly affected. A gned





Table 9: Environmental Indicator Analysis

			Altern	ative A	Alter <u>n</u>	ative B	Al <u>ter</u> n	ative C	Altern	ative D	Al <u>tern</u>	ative E	Α
Subaccount	Indicator	Weight	Value	Score	Value	Score	Value	Score	Value	Score	Value	Score	Va
Water Quality	Water Treatment Requirements	6	4	24	5	30	2	12	6	36	1	6	
	Flexibility for Water Treatment and Recycle	2	3	6	2	4	5	10	4	8	5	10	
	Subaccount Merit Score		3	80	3	34	2	2	44		16		
	Subaccount Merit Rating		3	.8	4	.3	2	.8	5	.5	2	.0	
Hydrology	Catchment Impacted	5	1	5	1	5	1	5	2	10	2	10	
	Number of Affected Sub-watersheds	5	5	25	5	25	5	25	4	20	4	20	
	Subaccount Merit Score		3	30	3	30	3	0	3	0	3	0	
	Subaccount Merit Rating		3	.0	3	.0	3	.0	3	.0	3	.0	
		_											
Aquatic Resources	Loss of Fish Habitat (waterbody)	5	6	30	6	30	6	30	6	30	6	30	
	Loss of Fish Habitat (watercourse)	6	5	30	5	30	4	24	6	36	6	36	
	Number of new crossings	3	6	18	6	18	6	18	6	18	6	18	
	Subaccount Merit Score		7	78	78		72		84		84		
	Subaccount Merit Rating		5	.6	5	.6	5	.1	6	.0	6	.0	
	1	T	T	T	T	1	1		1	T	T		
Terrestrial Resources	Loss of Wetland	5	1	5	1	5	1	5	4	20	6	30	
	Use of Disturbed Habitat	6	1	6	1	6	2	12	1	6	1	6	
	Footprint	3	1	3	1	3	3	9	3	9	4	12	
	Loss of Forest	5	1	5	1	5	3	15	3	15	4	20	
	Subaccount Merit Score		19		19		41		5	50	68		
	Subaccount Merit Rating		1	.0	1	.0	2	.2	2	.6	3	.6	
		1	1		1				1	1			
Sensitive Species	Loss of Mainland Moose Habitat	4	1	4	1	4	1	4	4	16	6	24	
	Loss of Brook Trout Habitat	6	5	30	5	30	4	24	6	36	6	36	
	Subaccount Merit Score		3	4	3	34	2	8	5	2	6	0	
	Subaccount Merit Rating		3	.4	3	.4	2.	.8	5	.2	6.	.0	L
								10					
Atmospheric Emissions	Fugitive Dust	6	5	30	5	30	2	12	6	36	3	18	
ETTISSIONS	GHG Emissions	5	5	25	5	25	1	5	4	20	2	10	
	Noise Emissions	3	1	3	1	3	2	6	1	3	1	3	
	Subaccount Merit Score			8		58	23		59		31		
	Subaccount Merit Rating		4	.1	4	.1	1.	.6	4	.2	2.	.2	I

Altern	ative F	Alternative G						
Value	Score	Value	Score					
3	18	5	30					
2	4	2	4					
2	2	3	4					
2.	.8	4.	.3					

4	20	1	5
6	30	5	25
5	0	3	0
5.	.0	3.	.0

3.	.1	6.	.0
4	3	8	4
4	12	6	18
1	6	6	36
5	25	6	30

- 1.		4	
2	4	8	2
1	5	4	20
1	3	4	12
1	6	5	30
2	10	4	20

2	8	5	20
1	6	6	36
1	4	5	6
1.	.4	5.	6

4	24	6	36
4	20	4	20
6	18	2	6
6	2	6	2
4.	4	4.	4





Cubercount		Weight	Altern	ative A	Alternative B		Altern	ative C	Alternative D		Alternative E		Alternative F		Altern	ative G
Subaccount	Indicator		Value	Score	Value	Score	Value	Score	Value	Score	Value	Score	Value	Score	Value	Score
Protected Areas	Proximity to Protected Areas	1	1	1	1	1	1	1	1	1	2	2	3	3	1	1
	Subaccount Merit Score		-	1				1		1	ź	2		3	1	I
	Subaccount Merit Rating		1.	1.0		1.0		1.0		.0	2.0		3.0		1.	.0
Hazard Potential to	Magnitude of Failure	2	2	4	2	4	5	10	1	2	5	10	2	4	2	4
the Environment	Downstream Sensitivities	Downstream Sensitivities 6		24	4	24	6	36	2	12	5	30	2	12	4	24
	Subaccount Merit Score		2	8	2	8	4	·6	14		4	0	1	6	2	8
	Subaccount Merit Rating		3.5		3.5		5.8		1.8		5.0		2.0		3.5	





Table 10: Technical Indicator Analysis

Subaccount	Indicator		Alterna	ative A	Alterna	ative B	Alte <u>rn</u>	ative C	Alterna	ative D	Alterna	ative E	A
		Weight	Value	Score	Value	Score	Value	Score	Value	Score	Value	Score	V
Design Factors	Storage to Dam Volume Ratio	4	4	16	2	8	1	4	1	4	1	4	
	Dam Volume	6	5	30	1	6	1	6	1	6	1	6	
	Natural Topographic Containment	2	3	6	4	8	3	6	4	8	4	8	
	Subaccount Merit Score		5	2	2	2	1	6	1	8	1	8	
	Subaccount Merit Rating		4.	3	1.	.8	1	.3	1.5		1.	5	
Safety Factors	Monitoring Requirements	3	2	6	2	6	1	3	1	3	2	6	
	Dam Height	6	4	24	4	24	6	36	1	6	1	6	
	Impoundment Configuration	6	4	24	5	30	1	6	2	12	1	6	
	Contaminant Management	5	5	25	5	25	2	10	6	30	2	10	
	Subaccount Merit Score		7	9	8	5	5	5	5	1	2	8	
	Subaccount Merit Rating		4.	0	4	.3	2	.8	2.	.6	1.	4	
Water Management	Length of Ditching	5	3	15	5	25	3	15	3	15	1	5	
3	Number of Pumps and Pipelines	3	2	6	5	15	2	6	4	12	4	12	
	Impacts to Annual Water Balance	3	5	15	3	9	1	3	5	15	5	15	
	Reclaim Water Return	6	1	6	5	30	4	24	5	30	6	36	
	Subaccount Merit Score	-	42 79				8	7		6			
	Subaccount Merit Rating		2.5		4.6		2.8		4.	.2	4.	4.0	
	1	1		1	1		T	T					_
Final Embankment	Final Embankment Construction	6	4	24	5	30	3	18	2	12	6	36	
Configuration	Subaccount Merit Score		24		30		18		1				
	Subaccount Merit Rating		4.	0	5.	.0	3	.0	2.	.0	6.	0	
Compliance with	Ease of Obtaining Initial Permits	1	4	4	6	6	2	2	5	5	2	2	
Environmental	Subaccount Merit Score		4	ŀ	6	5		2		5	2	2	
Approvals	Subaccount Merit Rating		4.	0	6	.0	2	.0	5.	.0	2.	0	
Complexity of	Tailings Disposal	6	5	30	6	36	2	12	6	36	3	18	
Operations	Processing Complexity	5	4	20	5	25	2	10	5	25	2	10	
	Distance from the Mill	5	1	5	6	30	6	30	6	30	6	30	
	Elevation from the Mill	3	6	18	1	3	1	3	1	3	1	3	-
	Climatic Challenges	4	4	16	5	20	2	8	5	20	3	12	
	Subaccount Merit Score	т	8			14		i3		14	7		
	Subaccount Merit Rating		3.			.0		.7	5.0		3.2		<u> </u>

Alterna	ative F	Alterna	ative G
Value	Score	Value	Score
6	24	1	4
6	36	1	6
5	10	3	6
7(C	1	6
5.	8	1.	.3
6	18	1	3
4	24	2	12
6	36	1	6
5	25	4	20
10	13	4	1
5.	2	2.	.1
6	30	2	10
1	3	5	15
1	3	6	18
1	6	5	30
42	2	7	3
2.	5	4.	.3
6	36	1	6
3	6	e	5
6.	0	1.	0
4	4	4	4
4		4	
4.	U	4.	U
4	24	6	36
4	20	5	25
1	5	6	30
5	15	1	3
4	16	5	20
8		11	
3.	5	5.	0





Subaccount	Indicator		Alterna	ative A	Alterna	ative B	Altern	ative C	Alterna	ative D	Alterna	ative E	Altern	ative F	Alterna	ative G
		Weight	Value	Score	Value	Score	Value	Score	Value	Score	Value	Score	Value	Score	Value	Score
Constructability	Material Availability	4	2	8	6	24	6	24	6	24	6	24	1	4	6	24
	Foundation Suitability	6	1	6	3	18	6	36	3	18	6	36	1	6	3	18
	Subaccount Merit Score		1.	4	4	2	6	50	4	2	6	0	1	0	4	.2
	Subaccount Merit Rating		1.	4	4.	.2	6	.0	4.	2	6.	.0	1.	.0	4.	.2





Table 11: Project Economics Indicator Analysis

C. ha and the	In all not one	Mainht	Altern	ative A	Altern	ative B	Altern	ative C	Alterna	ative D	Altern	ative E	Altern	ative F	Alterna	ative G
Subaccount	Indicator	Weight	Value	Score	Value	Score	Value	Score	Value	Score	Value	Score	Value	Score	Value	Score
Total TMF	Initial Capital Costs	5	5	25	3	15	1	5	5	25	6	30	4	20	6	30
Costs	Sustaining Capital Costs	4	4	16	6	24	1	4	2	8	1	4	6	24	1	4
l	Operating Costs	6	6	36	3	18	1	6	6	36	4	24	6	36	6	36
	Closure Costs	2	6	12	6	12	6	12	5	10	1	2	1	2	6	12
	Post-Closure Costs	2	2	4	4	8	1	2	1	2	6	12	6	12	1	2
	Ancillary Costs	4	3	12	3	12	4	16	5	20	2	8	1	4	6	24
	Subaccount Merit Score		1	05	8	9	4	5	1(01	8	0	9	8	1(08
	Subaccount Merit Rating		4	.6	3	.9	2	.0	4	.4	3	.5	4	.3	4	.7
	•	•	•		•		•		•		•		•		•	
Economic	Projected Timeline for Permits	6	1	6	4	24	1	6	4	24	5	30	1	6	1	6

	Subaccount Merit Rating		2	.4	4	.9	1	.5	4	.5	3	.2	2
	Subaccount Merit Score		2	6	5	4	1	6	4	9	3	35	2
Risks	Projected Timeline for Start of Operations	5	4	20	6	30	2	10	5	25	1	5	4
Economic	Projected Timeline for Permits	6	1	6	4	24	1	6	4	24	5	30	1

	6	1	6
	20	4	20
2	6	2	6
2.	.4	2.	.4





Table 12: Socio-economic Indicator Analysis

			Altern	ative A	Altern	ative B	Altern	ative C	Alterna	ative D	Altern	ative E	Altern	ative F	Alterna	ative G
Subaccount	Indicator	Weight	Value	Score	Value	Score	Value	Score	Value	Score	Value	Score	Value	Score	Value	Score
Land Use	Loss of Recreational Fishing	2	1	2	4	8	4	8	4	8	5	10	1	2	6	12
	Loss of Commercial Forest Harvesting	4	6	24	4	16	6	24	4	16	4	16	1	4	4	16
	Loss of ATV Trails	2	6	12	2	4	2	4	1	2	4	8	1	2	3	6
	Loss of Private Land Ownership	2	2	4	6	12	6	12	6	12	6	12	1	2	6	12
	Subaccount Merit Score		4	.2	4	0	2	18	3	8	4	6	1	0	4	-6
	Subaccount Merit Rating		4	.2	4	.0	4	.8	3	.8	4	.6	1	.0	4	.6
Human Health and	Fugitive Dust	5	5	25	5	25	2	10	6	30	3	15	4	20	6	30
Public Safety	Hazard Potential to the Public	6	1	6	4	24	6	36	2	12	5	30	2	12	4	24
	Risk to Workers	6	6	36	6	36	4	24	5	30	1	6	6	36	5	30
	Subaccount Merit Score		6	7	8	5	7	70	7	2	5	1	6	8	8	4
	Subaccount Merit Rating		3	.9	5	.0	4	.1	4	.2	3.	.0	4	.0	4	.9
Operational Impact	Change in Aesthetics / Visual Impacts	6	4	24	4	24	6	36	1	6	1	6	4	24	2	12
	Noise Emissions	3	6	18	1	3	2	6	1	3	1	3	6	18	2	6
	Subaccount Merit Score		4	2	2	7	۷	12	9)	ç)	4	2	1	8
	Subaccount Merit Rating		4	.7	3	.0	4	.7	1	.0	1.	.0	4	.7	2	.0
									•				•			
Local Economic Risk	Loss of Local Jobs and Business Opportunities	1	4	4	4	4	1	1	3	3	1	1	5	5	3	3
	Subaccount Merit Score		4	4	2	4		1		3		1		5	3	3
	Subaccount Merit Rating		4	.0	4	.0	1	.0	3	.0	1.	.0	5	.0	3.	.0





Culture	\A/_*	Alterna	ative A	Alterna	ative B	Alterna	ative C	Alterna	tive D	Alterna	ative E	Alterna	ative F	Alterna	tive G
Subaccount	Weight	Rating	Score	Rating	Score	Rating	Score	Rating	Score	Rating	Score	Rating	Score	Rating	Score
Water Quality	5	3.8	19	4.3	21	2.8	14	5.5	28	2.0	10	2.8	14	4.3	21
Hydrology	3	3.0	9	3.0	9	3.0	9	3.0	9	3.0	9	5.0	15	3.0	9
Aquatic Resources	6	5.6	33	5.6	33	5.1	31	6.0	36	6.0	36	3.1	18	6.0	36
Terrestrial Resources	2	1.0	2	1.0	2	2.2	4	2.6	5	3.6	7	1.3	3	4.3	9
Sensitive Species	3	3.4	10	3.4	10	2.8	8	5.2	16	6.0	18	1.4	4	5.6	17
Atmospheric Emissions	4	4.1	17	4.1	17	1.6	7	4.2	17	2.2	9	4.4	18	4.4	18
Protected Areas	1	1.0	1	1.0	1	1.0	1	1.0	1	2.0	2	3.0	3	1.0	1
Hazard Potential to the Environment	6	3.5	21	3.5	21	5.8	35	1.8	11	5.0	30	2.0	12	3.5	21
Account Merit Score		11	2	11	4	10)8	12	2	12	21	8	7	13	1
Account Merit Rating		4.	4	4.	5	4.	.3	4.	8	4.	8	3.	4	5.	2

Table 13: Environmental Account Analysis

Table 14: Technical Account Analysis

Cubaccount	Mainht	Alterna	ative A	Alterna	ative B	Alterna	ative C	Alterna	tive D	Alterna	ative E	Alterna	ative F	Alterna	tive G
Subaccount	Weight	Rating	Score	Rating	Score	Rating	Score	Rating	Score	Rating	Score	Rating	Score	Rating	Score
Design Factors	3	4.3	13	1.8	6	1.8	5	1.5	5	1.5	5	5.8	18	1.3	4
Safety Factors	6	4.0	24	4.3	26	2.8	17	2.6	15	1.4	8	5.2	31	2.1	12
Water Management	5	2.5	12	4.6	23	2.8	14	4.2	21	4.0	20	2.5	12	4.3	21
Final Embankment Configuration	2	4.0	8	5.0	10	3.0	6	2.0	4	6.0	12	6.0	12	1.0	2
Compliance with Environmental															
Approvals	5	4.0	20	6.0	30	2.0	10	5.0	25	2.0	10	4.0	20	4.0	20
Complexity of Operations	4	3.9	15	5.0	20	2.7	11	5.0	20	3.2	13	3.5	14	5.0	20
Constructability	4	1.4	6	4.2	17	6.0	24	4.2	17	6.0	24	1.0	4	4.2	17
Account Merit Score		98	8	13	81	8	6	10)7	92	2	11	1	9	6
Account Merit Rating		3.	4	4.	5	3.	0	3.	7	3.	2	3.	8	3.	3

Table 15: Project Economics Sub-Account Analysis

Subaccount	Mainht	Alterna	tive A	Alterna	tive B	Alterna	tive C	Alterna	tive D	Alterna	ative E	Altern	ative F	Alterna	ative G
Subaccount	Weight	Rating	Score	Rating	Score	Rating	Score								
Total TMF Costs	6	4.6	27	3.9	23	2.0	12	4.4	26	3.5	21	4.3	26	4.7	28
Economic Risks	4	2.4	9	4.9	20	1.5	6	4.5	18	3.2	13	2.4	9	2.4	9
Account Merit Score		37	7	43	3	18	3	44	4	34	4	3	5	3	8
Account Merit Rating		3.	7	4.	3	1.	B	4.	4	3.	4	3.	.5	3.	.8





Table 16: Socio-economic Sub-Account Analysis

Cubaccount)A/-:b.t	Alterna	ative A	Alterna	ative B	Alterna	tive C	Alterna	tive D	Alterna	ative E	Alterna	ative F	Alterna	ative G
Subaccount	Weight	Rating	Score	Rating	Score	Rating	Score	Rating	Score	Rating	Score	Rating	Score	Rating	Score
Land Use	3	4.2	13	4.0	12	4.8	14	3.8	11	4.6	14	1.0	3	4.6	14
Human Health and Public Safety	5	3.9	20	5.0	25	4.1	21	4.2	21	3.0	15	4.0	20	4.9	25
Operational Impact	3	4.7	14	3.0	9	4.7	14	1.0	3	1.0	3	4.7	14	2.0	6
Local Economic Risk	2	4.0	8	4.0	8	1.0	2	3.0	6	1.0	2	5.0	10	3.0	6
Account Merit Score		54	4	54	4	5	1	4	2	34	4	4	7	5	1
Account Merit Rating		4.	2	4.	2	3.	9	3.	2	2.	6	3.	6	3.	.9

Table 17: MAA Base Case Results

A	Mainht	Alterna	ative A	Alterna	tive B	Alterna	ative C	Alterna	tive D	Alterna	ative E	Alterna	ative F	Alterna	tive G
Account	Weight	Rating	Score	Rating	Score	Rating	Score	Rating	Score	Rating	Score	Rating	Score	Rating	Score
Environment	6	4.4	26	4.5	27	4.3	26	4.8	29	4.8	29	3.4	20	5.2	31
Technical	3	3.4	10	4.5	14	3.0	9	3.7	11	3.2	9	3.8	11	3.3	10
Economics	1.5	3.7	6	4.3	6	1.8	3	4.4	7	3.4	5	3.5	5	3.8	6
Socioeconomics	3	4.2	13	4.2	12	3.9	12	3.2	10	2.6	8	3.6	11	3.9	12
Alternative Merit Score		5	5	60	0	49	9	5	6	5	1	48	8	58	8
Alternative Merit Rating		4.	1	4.	4	3.	6	4.	2	3.	8	3.	6	4.	3





Table 18: Sensitivity Analysis

Connerio			Alternative	Merit Rating			
Scenario	Alternative A	Alternative B	Alternative C	Alternative D	Alternative E	Alternative F	Alternative G
Base Case	4.1	4.4	3.6	4.2	3.8	3.6	4.3
Scenario 2	3.9	4.4	3.2	4.0	3.5	3.6	4.0
Scenario 3	3.0	3.5	2.3	3.0	2.6	3.0	2.9
Scenario 4	4.1	4.3	3.7	3.9	3.4	3.6	4.2
Scenario 5	4.2	4.6	3.9	4.4	4.1	3.8	4.5



Appendix A

Multiple Accounts Analysis Tables from Sensitivity Analysis

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Scenario 1: Base Case

(See Tables 9 to 17, in Main Text)



Scenario 2: Equal Accounts Weights



Scenario 2: Equal Accounts Weights Summary

Account	Weighting	Sub-account	Weighting	Indicator	Weightin
Environment	1	Water Quality	5	Water Treatment Requirements	6
				Flexibility for Water Treatment and Recycle	2
		Hydrology	3	Catchment Area	5
				Number of Affected Sub-watersheds	5
		Aquatic Resources	6	Loss of Fish Habitat (waterbody)	5
				Loss of Fish Habitat (watercourse)	6
				Number of new crossings	3
		Terrestrial Resources	2	Loss of Wetland	5
				Use of Disturbed Habitat	6
				Footprint	3
				Loss of Forest	5
		Sensitive Species	3	Loss of Mainland Moose Habitat	4
				Loss of Brook Trout Habitat	6
		Atmospheric Emissions	4	Fugitive Dust	6
				GHG Emissions	5
				Noise Emissions	3
		Protected Areas	1		-
	-		1	Proximity to Protected Areas	1
		Hazard Potential to the Environment	6	Magnitude of Failure	2
		Design Fastana		Downstream Sensitivities	6
echnical	1	Design Factors	3	Storage to Dam Volume Ratio	4
				Dam Volume	6
	-			Natural Topographic Containment	2
		Safety Factors	6	Monitoring Requirements	3
				Dam Height	6
				Impoundment Configuration	6
				Contaminant Management	5
		Water Management	5	Length of Ditching	5
				Number of Pumps and Pipelines	3
				Impacts to Annual Water Balance	3
				Reclaim Water Return	6
		Expansion Capacity	2	Maximum Expansion Capacity	6
		Compliance with Environmental Approvals	5	Ease of Obtaining Initial Permits	1
		Complexity of Operations	4	Tailings Disposal	6
	-		4	• •	-
				Processing Complexity	5
				Distance from the Mill	5
				Elevation from the Mill	3
	-			Climatic Challenges	4
		Constructability	4	Material Availability	4
				Foundation Suitability	6
conomics	1	Total Costs	6	Initial Capital Costs	5
				Sustaining Capital Costs	4
				Operating Costs	6
				Closure Costs	2
				Post-Closure Costs	2
				Ancillary Costs	4
		Economic Risks	4	Projected Timeline for Permits	6
				Projected Timeline for Start of Operations	5
ocioeconomics	1	Non-Indigenous Land Use	3	Loss of Recreational Fishing	2
				Loss of Commercial Forest Harvesting	4
				Loss of ATV Trails	2
	1			Loss of Private Land Ownership	2
		Human Health and Public Safetv	5	Fugitive Dust	5
		Human Health and Public Safety	5	Fugitive Dust Hazard Potential to the Public	_
		Human Health and Public Safety	5	Hazard Potential to the Public	6
				Hazard Potential to the Public Risk to Workers	6 6
		Human Health and Public Safety Operational Impact	5	Hazard Potential to the Public	6



Scenario 2: Environmental Account Analysis

				native A		native B		native C		ative D		native E		native F		native G
Subaccount	Indicator	Weight	Value	Score	Value	Score	Value	Score	Value	Score	Value	Score	Value	Score	Value	Score
	Water Treatment Requirements	6	4	24	5	30	2	12	6	36	1	6	3	18	5	30
Water Quality	Flexibility for Water Treatment and Recycle	2	3	6	2	4	5	10	4	8	5	10	2	4	2	4
Mater Quality	Subaccount	Merit Score		30		34		22		14		16		22		34
	Subaccount M	erit Rating		3.8	4	1.3	2	2.8	5	.5	2	2.0	2	2.8		4.3
	Catchment Area	5	1	5	1	5	1	5	2	10	2	10	4	20	1	5
Hydrology	Number of Affected Sub-watersheds	5	5	25	5	25	5	25	4	20	4	20	6	30	5	25
.,	Subaccount			30		30		30		30		30		50		30
	Subaccount M	erit Rating		3.0	3	3.0		3.0	3	.0	3	3.0	5	5.0		3.0
	Loss of Fish Habitat (waterbody)	5	6	30	6	30	6	30	6	30	6	30	5	25	6	30
	Loss of Fish Habitat (watercourse)	6	5	30	5	30	4	24	6	30	6	30	5	6	6	30
Aquatic Resources		3	6	18	6	30 18	6	24 18	6	18	6	18	4	12	6	18
Aquatic Resources	Number of new crossings Subaccount			78		78		72		34		84		43		84
	Subaccount M			5.6		5.6		5.1		.0		5. 0		+5 8.1		6.0
	Subaccount M	ent rating			1 3		1						· · · ·		1	0.0
	Loss of Wetland	5	1	5	1	5	1	5	4	20	6	30	2	10	4	20
	Use of Disturbed Habitat	6	1	6	1	6	2	12	4	6	1	6	1	6	5	30
	Footprint	3	1	3	1	3	3	9	3	9	4	12	1	3	4	12
Terrestrial Resources	Loss of Forest	5	1	5	1	5	3	15	3	9 15	4	20	1	5	4	20
	Subaccount	-		19		19		41		50		68	· · ·	24		82
	Subaccount M			1.0		1.0		2.2				3.6		.3		4.3
	Subaccount in	ent nating											ļ			-1.5
	Loss of Mainland Moose Habitat	4	1	4	1	4	1	4	4	16	6	24	2	8	5	20
	Loss of Brook Trout Habitat	6	5	30	5	30	4	24	6	36	6	36	1	6	6	36
Sensitive Species		Ű		50		50		2.	Ű	50		50	·	Ŭ	Ŭ	50
	Subaccount	Merit Score		34		34		28		52	f	60		14		56
	Subaccount M			3.4		3.4		2.8		.2		5.0		.4		5.6
		,														
	Fugitive Dust	6	5	30	5	30	2	12	6	36	3	18	4	24	6	36
	GHG Emissions	5	5	25	5	25	1	5	4	20	2	10	4	20	4	20
Atmospheric Emissions	Noise Emissions	3	1	3	1	3	2	6	1	3	1	3	6	18	2	6
	Subaccount	Merit Score		58	-	58		23		59		31		52		62
	Subaccount M	lerit Rating	4	1.1	4	1.1	1	1.6	4	.2	2	2.2	4	l.4		4.4
	Proximity to Protected Areas	1	1	1	1	1	1	1	1	1	2	2	3	3	1	1
Protected Areas	Subaccount	Merit Score		1		1		1		1		2		3		1
	Subaccount M	erit Rating		1.0	1	1.0	1	1.0	1	.0	2	2.0	3	s.o		1.0
				_												
	Magnitude of Failure	2	2	4	2	4	5	10	1	2	5	10	2	4	2	4
d Potential to the Enviro	Downstream Sensitivities	6	4	24	4	24	6	36	2	12	5	30	2	12	4	24
	Subaccount			28		28		46		14		40		16		28
	Subaccount M	lerit Rating		3.5	3	3.5	5	5.8	1	.8	5	5.0	2	2.0		3.5
	Subaccount	Weight	Rating	Score	Rating	Score	Rating	Score	Rating	Score	Rating	Score	Rating	Score	Rating	Score
	Water Quality	5	3.8	18.8	4.3	21.3	2.8	13.8	5.5	27.5	2.0	10.0	2.8	13.8	4.3	21.3
	Hydrology	3	3.0	9.0	3.0	9.0	3.0	9.0	3.0	9.0	3.0	9.0	5.0	15.0	3.0	9.0
	Aquatic Resources	6	5.6	33.4	5.6	33.4	5.1	30.9	6.0	36.0	6.0	36.0	3.1	18.4	6.0	36.0
	Terrestrial Resources	2	1.0	2.0	1.0	2.0	2.2	4.3	2.6	5.3	3.6	7.2	1.3	2.5	4.3	8.6
	Sensitive Species	3	3.4	10.2	3.4	10.2	2.8	8.4	5.2	15.6	6.0	18.0	1.4	4.2	5.6	16.8
	Atmospheric Emissions	4	4.1	16.6	4.1	16.6	1.6	6.6	4.2	16.9	2.2	8.9	4.4	17.7	4.4	17.7
	Protected Areas	1	1.0	1.0	1.0	1.0	1.0	1.0	1.0	1.0	2.0	2.0	3.0	3.0	1.0	1.0
	Hazard Potential to the Environment	6	3.5	21.0	3.5	21.0	5.8	34.5	1.8	10.5	5.0	30.0	2.0	12.0	3.5	21.0
	Account	Merit Score	1	12.0	1 11	14.5	1 10	08.4	12	1.7	12	21.0	8	6.6	1	31.4
	Account M			1.4		4.5		1.3		.8		1.8		3.4		5.2





Scenario 2: Technical Indicator Analysis

			Alter	native A	Alter	native B	Alter	native C	Alterr	native D	Alterr	native E	Alter	native F	Alter	native G
Subaccount	Indicator	Weight	Value	Score	Value	Score	Value	Score	Value	Score	Value	Score	Value	Score	Value	Score
	Storage to Dam Volume Ratio	4	4	16	2	8	1	4	1	4	1	4	6	24	1	4
	Dam Volume	6	5	30	1	6	2	12	1	6	1	6	6	36	1	6
Design Factors	Natural Topographic Containment	2	3	6	4	8	3	6	4	8	4	8	5	10	3	6
	Suba	ccount Merit Score		52		22		22		18		18		70		16
	Subaco	ount Merit Rating		4.3		1.8		1.8		1.5	1	1.5		5.8		1.3
	Monitoring Requirements	3	2	6	2	6	1	3	1	3	2	6	6	18	1	3
	Dam Height	6	4	24	4	24	6	36	1	6	1	6	4	24	2	12
Safety Factors	Impoundment Configuration	6	4	24	5	30	1	6	2	12	1	6	6	36	1	6
Salety Factors	Contaminant Management	5	5	25	5	25	2	10	6	30	2	10	5	25	4	20
	Suba	ccount Merit Score		79		85		55		51		28		103		41
	Subacc	ount Merit Rating		4.0		4.3		2.8		2.6	1	1.4		5.2		2.1
	Length of Ditching	5	3	15	5	25	3	15	3	15	1	5	6	30	2	10
	Number of Pumps and Pipelines	3	2	6	5	15	2	6	4	12	4	12	1	3	5	1
	Impacts to Annual Water Balance	3	5	15	3	9	1	3	5	15	5	15	1	3	6	18
Water Management	Reclaim Water Return	6	1	6	5	30	4	24	5	30	6	36	1	6	5	3(
		ccount Merit Score		42	-	79		48		72	-	68		42		73
		ount Merit Rating		2.5	-	4.6	-	2.8		4.2		1.0	_	2.5		4.3
		_														
	Maximum Expansion Capacity	6	4	24	5	30	3	18	2	12	6	36	6	36	1	6
Expansion Capacity	Suba	ccount Merit Score		24		30		18		12		36		36		6
	Subacc	ount Merit Rating		4.0		5.0		3.0		2.0		5.0		6.0		1.0
Compliance with	Ease of Obtaining Initial Permits	1	4	4	6	6	2	2	5	5	2	2	4	4	4	4
Environmental	5	ccount Merit Score		4	-	6		2	-	5		2		4		4
Approvals		ount Merit Rating		4.0		6.0		2.0		5.0		2.0		4.0		4.0
											-					
	Tailings Disposal	6	5	30	6	36	2	12	6	36	3	18	4	24	6	36
	Processing Complexity	5	4	20	5	25	2	10	5	25	2	10	4	20	5	25
	Distance from the Mill	5	1	5	6	30	6	30	6	30	6	30	1	5	6	30
Complexity of	Elevation from the Mill	3	6	18	1	3	1	3	1	3	1	3	5	15	1	3
Operations	Climatic Challenges	4	4	16	5	20	2	8	5	20	3	12	4	16	5	2
		ccount Merit Score		89		114	_	63		114		73		80	-	114
		ount Merit Rating		3.9	_	5.0	_	2.7		5.0		3.2	_	3.5		5.0
	Material Availability	4	2	8	6	24	6	24	6	24	6	24	1	4	6	24
Constructability	Foundation Suitability	6	1	6	3	18	6	36	3	18	6	36	1	6	3	1
constructability	Suba	ccount Merit Score		14		42		60		42		60		10		42
	Cuberer	ount Merit Rating		1.4		4.2		6.0		4.2		5.0		1.0		4.2

Subaccount	Weight	Rating	Score												
Design Factors	3	4.3	13.0	1.8	5.5	1.8	5.5	1.5	4.5	1.5	4.5	5.8	17.5	1.3	4.0
Safety Factors	6	4.0	23.7	4.3	25.5	2.8	16.5	2.6	15.3	1.4	8.4	5.2	30.9	2.1	12.3
Water Management	5	2.5	12.4	4.6	23.2	2.8	14.1	4.2	21.2	4.0	20.0	2.5	12.4	4.3	21.5
Expansion Capacity	2	4.0	8.0	5.0	10.0	3.0	6.0	2.0	4.0	6.0	12.0	6.0	12.0	1.0	2.0
Compliance with Environmental Approvals	5	4.0	20.0	6.0	30.0	2.0	10.0	5.0	25.0	2.0	10.0	4.0	20.0	4.0	20.0
Complexity of Operations	4	3.9	15.5	5.0	19.8	2.7	11.0	5.0	19.8	3.2	12.7	3.5	13.9	5.0	19.8
Constructability	4	1.4	5.6	4.2	16.8	6.0	24.0	4.2	16.8	6.0	24.0	1.0	4.0	4.2	16.8
Account	Merit Score	98	3.1	13	0.9	87	.1	10	6.6	91	.6	11().7	96	.4
Account N	lerit Rating	3.	.4	4	.5	3.	.0	3.	.7	3.	.2	3.	.8	3.	3

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Scenario 2: Project Economics Indicator Analysis

			Altern	ative A	Altern	ative B	Altern	ative C	Altern	ative D	Altern	ative E	Altern	ative F	Altern	ative G
Subaccount	Indicator	Weight	Value	Score												
	Initial Capital Costs	5	5	25	3	15	1	5	5	25	6	30	4	20	6	30
	Sustaining Capital Costs	4	4	16	6	24	1	4	2	8	1	4	6	24	1	4
	Operating Costs	6	6	36	3	18	1	6	6	36	4	24	6	36	6	36
Total Costs	Closure Costs	2	6	12	6	12	6	12	5	10	1	2	1	2	6	12
Total Costs	Post-Closure Costs	2	2	4	4	8	1	2	1	2	6	12	6	12	1	2
	Ancillary Costs	4	3	12	3	12	4	16	5	20	2	8	1	4	6	24
	Subaccount N	Aerit Score	1	05	8	19	4	5	1	01	8	0	9	98	10	08
	Subaccount M	erit Rating	4	.6	3	.9	2	.0	4	.4	3	.5	4	.3	4	.7
	Projected Timeline for Permits	6	1	6	4	24	1	6	4	24	5	30	1	6	1	6
Economic Risks	Projected Timeline for Start of Operations	5	4	20	6	30	2	10	5	25	1	5	4	20	4	20
ECONOMIC RISKS	Subaccount N	Aerit Score	2	26	5	4	1	6	4	19	3	5	2	26	2	6
	Subaccount M	erit Rating	2	.4	4	.9	1	.5	4	.5	3	.2	2	.4	2	.4

Subaccount	Weight	Rating	Score												
Total Costs	6	4.6	27.4	3.9	23.2	2.0	11.7	4.4	26.3	3.5	20.9	4.3	25.6	4.7	28.2
Economic Risks	4	2.4	9.5	4.9	19.6	1.5	5.8	4.5	17.8	3.2	12.7	2.4	9.5	2.4	9.5
Account M	erit Score	36	.8	42	.9	17	7.6	44	.2	33	8.6	35	5.0	37	.6
Account Me	rit Rating	3.	.7	4.	.3	1.	.8	4.	4	3.	.4	3.	.5	3.	.8



Scenario 2: Socioeconomics Indicator Analysis

			Alterr	ative A	Altern	ative B	Altern	ative C	Alterna	ative D	Altern	ative E	Altern	ative F	Altern	ative G
ubaccount	Indicator	Weight	Value	Score	Value	Score	Value	Score	Value	Score	Value	Score	Value	Score	Value	Score
	Loss of Recreational Fishing	2	1	2	4	8	4	8	4	8	5	10	1	2	6	12
	Loss of Commercial Forest Harvesting	4	6	24	4	16	6	24	4	16	4	16	1	4	4	16
Non-Indigenous Land Use	Loss of ATV Trails	2	6	12	2	4	2	4	1	2	4	8	1	2	3	6
Non-Indigenous Land Ose	Loss of Private Land Ownership	2	2	4	6	12	6	12	6	12	6	12	1	2	6	12
	Subaccount	Merit Score	4	42	4	10	4	18	3	8	4	6	1	0	3 46 46 46 2 4 5 5 84 4.9 4 2 3 2	46
	Subaccount N	lerit Rating	4	1.2	4	.0	4	.8	3	.8	4	.6	1	.0	4	4.6
	•															
	Fugitive Dust	5	5	25	5	25	2	10	6	30	3	15	4	20	6	30
	Hazard Potential to the Public	6	1	6	4	24	6	36	2	12	5	30	2	12	4	24
Human Health and Public Safety	Risk to Workers	6	6	36	6	36	4	24	5	30	1	6	6	36	5	30
	Subaccount	Merit Score		57	8	35	7	70	7	2	5	1	6	68	8	84
	Subaccount N	lerit Rating	3	8.9	5	.0	4	.1	4	.2	3	.0	4	.0	4	1.9
	Change in Aesthetics / Visual Impacts	6	4	24	4	24	6	36	1	6	1	6	4	24	2	12
On continued loss and	Noise Emissions	3	6	18	1	3	2	6	1	3	1	3	6	18	2	6
Operational Impact	Subaccount	Merit Score		42	ź	27	4	12		9		9	4	2		18
	Subaccount N	lerit Rating	4	1.7	3	.0	4	.7	1	.0	1	.0	4	.7	2	2.0
	·															
	Loss of Local Jobs and Business Opportunities	1	4	4	4	4	1	1	3	3	1	1	5	5	3	3
Local Economic Risk	Subaccount	Merit Score		4		4		1		3		1		5		3
	Subaccount N	lerit Rating	4	1.0	4	.0	1	.0	3	.0	1	.0	5	.0	3	3.0

Subaccount	Weight	Rating	Score												
Non-Indigenous Land Use	3	4.2	13	4.0	12	4.8	14	3.8	11	4.6	14	1.0	3	4.6	14
Human Health and Public Safety	5	3.9	20	5.0	25	4.1	21	4.2	21	3.0	15	4.0	20	4.9	25
Operational Impact	3	4.7	14	3.0	9	4.7	14	1.0	3	1.0	3	4.7	14	2.0	6
Local Economic Risk	2	4.0	8	4.0	8	1.0	2	3.0	6	1.0	2	5.0	10	3.0	6
Account	Aerit Score	5	4	5	4	5	1	4	2	3	4	4	7	5	1
Account M	erit Rating	4	.2	4.	.2	3.	9	3.	.2	2	.6	3.	.6	3.	.9



Scenario 2: Environmental Account Analysis

		Altern	ative A	Altern	ative B	Altern	ative C	Altern	ative D	Altern	ative E	Altern	ative F	Altern	ative G
Subaccount	Weight	Rating	Score												
Water Quality	5	3.8	18.8	4.3	21.3	2.8	13.8	5.5	27.5	2.0	10.0	2.8	13.8	4.3	21.3
Hydrology	3	3.0	9.0	3.0	9.0	3.0	9.0	3.0	9.0	3.0	9.0	5.0	15.0	3.0	9.0
Aquatic Resources	6	5.6	33.4	5.6	33.4	5.1	30.9	6.0	36.0	6.0	36.0	3.1	18.4	6.0	36.0
Terrestrial Resources	2	1.0	2.0	1.0	2.0	2.2	4.3	2.6	5.3	3.6	7.2	1.3	2.5	4.3	8.6
Sensitive Species	3	3.4	10.2	3.4	10.2	2.8	8.4	5.2	15.6	6.0	18.0	1.4	4.2	5.6	16.8
Atmospheric Emissions	4	4.1	16.6	4.1	16.6	1.6	6.6	4.2	16.9	2.2	8.9	4.4	17.7	4.4	17.7
Protected Areas	1	1.0	1.0	1.0	1.0	1.0	1.0	1.0	1.0	2.0	2.0	3.0	3.0	1.0	1.0
Hazard Potential to the Environment	6	3.5	21.0	3.5	21.0	5.8	34.5	1.8	10.5	5.0	30.0	2.0	12.0	3.5	21.0
Account	Merit Score	11	2.0	11	4.5	10	8.4	12	1.7	12	1.0	86	5.6	13	1.4
Account N	lerit Rating	4	.4	4	.5	4	.3	4	.8	4	.8	3	.4	5	.2

Scenario 2: Technical Account Analysis

		Alterna	ative A	Alterna	ative B	Alterna	ative C	Alterna	ative D	Alterna	ative E	Altern	ative F	Alterna	ative G
Subaccount	Weight	Rating	Score	Rating	Score	Rating	Score								
Design Factors	3	4.3	13.0	1.8	5.5	1.8	5.5	1.5	4.5	1.5	4.5	5.8	17.5	1.3	4.0
Safety Factors	6	4.0	23.7	4.3	25.5	2.8	16.5	2.6	15.3	1.4	8.4	5.2	30.9	2.1	12.3
Water Management	5	2.5	12.4	4.6	23.2	2.8	14.1	4.2	21.2	4.0	20.0	2.5	12.4	4.3	21.5
Expansion Capacity	2	4.0	8.0	5.0	10.0	3.0	6.0	2.0	4.0	6.0	12.0	6.0	12.0	1.0	2.0
Compliance with Environmental Approvals	5	4.0	20.0	6.0	30.0	2.0	10.0	5.0	25.0	2.0	10.0	4.0	20.0	4.0	20.0
Complexity of Operations	4	3.9	15.5	5.0	19.8	2.7	11.0	5.0	19.8	3.2	12.7	3.5	13.9	5.0	19.8
Constructability	4	1.4	5.6	4.2	16.8	6.0	24.0	4.2	16.8	6.0	24.0	1.0	4.0	4.2	16.8
Account	Merit Score	98	3.1	13	0.9	87	7.1	10	6.6	91	.6	11	0.7	96	5.4
Account N	lerit Rating	3	.4	4.	.5	3.	.0	3.	.7	3.	.2	3.	.8	3	.3



Scenario 2: Project Economics Account Analysis

		Alterna	ative A	Altern	ative B	Alterna	ative C	Alterna	ative D	Altern	ative E	Alterna	ative F	Alterna	ative G
Subaccount	Weight	Rating	Score	Rating	Score	Rating	Score	Rating	Score	Rating	Score	Rating	Score	Rating	Score
Total Costs	6	4.6	27.4	3.9	23.2	2.0	11.7	4.4	26.3	3.5	20.9	4.3	25.6	4.7	28.2
Economic Risks	4	2.4	9.5	4.9	19.6	1.5	5.8	4.5	17.8	3.2	12.7	2.4	9.5	2.4	9.5
Account N	∕lerit Score	36	5.8	42	2.9	17	.6	44	.2	33	3.6	35	.0	37	'.6
Account M	erit Rating	3.	.7	4	.3	1.	.8	4.	4	3.	.4	3.	5	3.	.8

Scenario 2: Socioeconomics Account Analysis

		Altern	ative A	Altern	ative B	Altern	ative C	Alterna	ative D	Altern	ative E	Altern	ative F	Alterna	ative G
Subaccount	Weight	Rating	Score	Rating	Score	Rating	Score	Rating	Score	Rating	Score	Rating	Score	Rating	Score
Non-Indigenous Land Use	3	4.2	13	4.0	12	4.8	14	3.8	11	4.6	14	1.0	3	4.6	14
Human Health and Public Safety	5	3.9	20	5.0	25	4.1	21	4.2	21	3.0	15	4.0	20	4.9	25
Operational Impact	3	4.7	14	3.0	9	4.7	14	1.0	3	1.0	3	4.7	14	2.0	6
Local Economic Risk	2	4.0	8	4.0	8	1.0	2	3.0	6	1.0	2	5.0	10	3.0	6
	Account Merit Score	5	4	5	4	5	1	4	2	3	4	4	7	5	51
A	ccount Merit Rating	4	.2	4	.2	3.	.9	3.	.2	2	.6	3.	6	3	.9

Scenario 2: Equal Accounts Weights Summary

		Alterna	ative A	Altern	ative B	Altern	ative C	Alterna	ative D	Altern	ative E	Altern	ative F	Altern	ative G
Account	Weight	Rating	Score	Rating	Score	Rating	Score	Rating	Score	Rating	Score	Rating	Score	Rating	Score
Environment	1	4.4	4	4.5	5	4.3	4	4.8	5	4.8	5	3.4	3	5.2	5
Technical	1	3.4	3	4.5	5	3.0	3	3.7	4	3.2	3	3.8	4	3.3	3
Economics	1	3.7	4	4.3	4	1.8	2	4.4	4	3.4	3	3.5	4	3.8	4
Socioeconomics	1	4.2	4	4.2	4	3.9	4	3.2	3	2.6	3	3.6	4	3.9	4
Alternative M	erit Score	1	6	1	7	1	3	1	6	1	4	1	4	1	6
Alternative Me	rit Rating	3	.9	4	.4	3	.2	4	.0	3.	.5	3	.6	4	.0



Scenario 3: All Weights Equal



Scenario 3: All Weights Equal Summary

Account	Weighting	Sub-account	Weighting	Indicator	Weighting
Environment	1	Water Quality	1	Water Treatment Requirements	1
				Flexibility for Water Treatment and Recycle	1
		Hydrology	1	Catchment Area	1
				Number of Affected Sub-watersheds	1
		Aquatic Resources	1	Loss of Fish Habitat (waterbody)	1
				Loss of Fish Habitat (watercourse)	1
				Number of new crossings	1
		Terrestrial Resources	1	Loss of Wetland	1
				Use of Disturbed Habitat	1
				Footprint	1
				Loss of Forest	1
		Sensitive Species	1	Loss of Mainland Moose Habitat	1
				Loss of Brook Trout Habitat	1
		Atmospheric Emissions	1	Fugitive Dust	1
			-	GHG Emissions	1
				Noise Emissions	1
		Protected Areas	1	Proximity to Protected Areas	1
		Hazard Potential to the Environment	1	Magnitude of Failure	1
				Downstream Sensitivities	1
Fechnical	1	Design Factors	1	Storage to Dam Volume Ratio	
	+ <u> </u>			Dam Volume	1
					1
		Safatu Factore	1	Natural Topographic Containment	1
		Safety Factors	1	Monitoring Requirements	
	-			Dam Height	1
	-			Impoundment Configuration	1
		Water Management		Contaminant Management	1
		Water Management	1	Length of Ditching	1
				Number of Pumps and Pipelines	1
				Impacts to Annual Water Balance	1
		5		Reclaim Water Return	1
		Expansion Capacity	1	Maximum Expansion Capacity	1
		Compliance with Environmental Approvals	1	Ease of Obtaining Initial Permits	1
		Complexity of Operations	1	Tailings Disposal	1
				Processing Complexity	1
				Distance from the Mill	1
				Elevation from the Mill	1
				Climatic Challenges	1
		Constructability	1	Material Availability	1
				Foundation Suitability	1
Economics	1	Total Costs	1	Initial Capital Costs	1
				Sustaining Capital Costs	1
				Operating Costs	1
				Closure Costs	1
				Post-Closure Costs	1
				Ancillary Costs	1
		Economic Risks	1	Projected Timeline for Permits	1
				Projected Timeline for Start of Operations	1
Socioeconomics	1	Non-Indigenous Land Use	1	Loss of Recreational Fishing	1
				Loss of Commercial Forest Harvesting	1
				Loss of ATV Trails	1
				Loss of Private Land Ownership	1
		Human Health and Public Safety	1	Fugitive Dust	1
	1		1	Hazard Potential to the Public	1
	1		1	Risk to Workers	1
		Operational Impact	1	Change in Aesthetics / Visual Impacts	1
	1		1	Noise Emissions	1
		Local Economic Risk	1	Loss of Local Jobs and Business Opportunities	1
		+		and the second	



Scenario 3: Environmental Indicator Analysis

			Alterr	native A	Altern	native B	Altern	ative C	Altern	ative D	Altern	ative E	Altern	ative F	Altern	native G
Subaccount	Indicator	Weight	Value	Score	Value	Score	Value	Score	Value	Score	Value	Score	Value	Score	Value	Score
	Water Treatment Requirements	1	4	4	5	5	2	2	6	6	1	1	3	3	5	5
	Flexibility for Water Treatment and Recycle	1	3	3	2	2	5	5	4	4	5	5	2	2	2	2
Water Quality	Subaccount	Merit Score		7		7		7	1	0		6		5		7
	Subaccount M	lerit Rating		3.5	3	3.5	3	.5	5	.0	3	.0	2	.5	3	3.5
	•						-									
	Catchment Area	1	1	1	1	1	1	1	2	2	2	2	4	4	1	1
the starts are	Number of Affected Sub-watersheds	1	5	5	5	5	5	5	4	4	4	4	6	6	5	5
Hydrology	Subaccount	Merit Score		6		6		6		5		6	1	0		6
	Subaccount M	lerit Rating		3.0	3	3.0	3	.0	3	.0	3	.0	5	.0	3	3.0
	1							1	-							
	Loss of Fish Habitat (waterbody)	1	6	6	6	6	6	6	6	6	6	6	5	5	6	6
	Loss of Fish Habitat (watercourse)	1	5	5	5	5	4	4	6	6	6	6	1	1	6	6
Aquatic Resources	Number of new crossings	1	6	6	6	6	6	6	6	6	6	6	4	4	6	6
	Subaccount			17		17		16		8		8		0		18
	Subaccount M	lerit Rating	5	5.7	5	5.7	5	.3	6	.0	6	.0	3	.3	e	5.0
					r											
	Loss of Wetland	1	1	1	1	1	1	1	4	4	6	6	2	2	4	4
	Use of Disturbed Habitat	1	1	1	1	1	2	2	1	1	1	1	1	1	5	5
Terrestrial Resources	Footprint	1	1	1	1	1	3	3	3	3	4	4	1	1	4	4
	Loss of Forest	1	1	1	1	1	3	3	3	3	4	4	1	1	4	4
	Subaccount			4		4		9	1			5		5		17
	Subaccount M	lerit Rating	1	1.0	1	1.0	2	.3	2	.8	3	.8	1	.3	4	4.3
	Loss of Mainland Moose Habitat	1	1	1	1	1	1	1	4	4	6	6	2	2	5	5
	Loss of Brook Trout Habitat	1	5	5	5	5	4	4	6	6	6	6	2	2	6	6
Sensitive Species		· ·	5	5	5	5	4	4	0	0	0	0	1		0	0
Sensitive species	Subaccount	Marit Coora		6		6		5	1	0	1	2		3		11
	Subaccount M			8.0		8.0		5 5		.0		.0		₃ .5		5.5
	Subaccount M	ient kaung		5.0		5.0			5	.0	0	.0		.5		5.5
	Fugitive Dust	1	5	5	5	5	2	2	6	6	3	3	4	4	6	6
	GHG Emissions	1	5	5	5	5	1	1	4	4	2	2	4	4	4	4
Atmospheric Emissions	Noise Emissions	1	1	1	1	1	2	2	1	4	1	1	6	6	2	2
	Subaccount	Merit Score		11		11		5	. 1	1		6	-	4		12
	Subaccount M			3.7		3.7		.7	3			.0		.7		1.0
	Proximity to Protected Areas	1	1	1	1	1	1	1	1	1	2	2	3	3	1	1
Protected Areas	Subaccount	Merit Score		1		1		1		1		2		3		1
	Subaccount M	lerit Rating	1	1.0	1	1.0	1	.0	1	.0	2	.0	3	.0	1	1.0
	1			-						-						
	Magnitude of Failure	1	2	2	2	2	5	5	1	1	5	5	2	2	2	2
Hazard Potential to the Environment	Downstream Sensitivities	1	4	4	4	4	6	6	2	2	5	5	2	2	4	4
	Subaccount			6		6		1				0		4		6
	Subaccount M	lerit Rating		3.0	3	3.0	5	.5	1	.5	5	.0	2	.0	3	3.0

Subaccount	Weight	Rating	Score												
Water Quality	1	3.5	3.5	3.5	3.5	3.5	3.5	5.0	5.0	3.0	3.0	2.5	2.5	3.5	3.5
Hydrology	1	3.0	3.0	3.0	3.0	3.0	3.0	3.0	3.0	3.0	3.0	5.0	5.0	3.0	3.0
Aquatic Resources	1	5.7	5.7	5.7	5.7	5.3	5.3	6.0	6.0	6.0	6.0	3.3	3.3	6.0	6.0
Terrestrial Resources	1	1.0	1.0	1.0	1.0	2.3	2.3	2.8	2.8	3.8	3.8	1.3	1.3	4.3	4.3
Sensitive Species	1	3.0	3.0	3.0	3.0	2.5	2.5	5.0	5.0	6.0	6.0	1.5	1.5	5.5	5.5
Atmospheric Emissions	1	3.7	3.7	3.7	3.7	1.7	1.7	3.7	3.7	2.0	2.0	4.7	4.7	4.0	4.0
Protected Areas	1	1.0	1.0	1.0	1.0	1.0	1.0	1.0	1.0	2.0	2.0	3.0	3.0	1.0	1.0
Hazard Potential to the Environment	1	3.0	3.0	3.0	3.0	5.5	5.5	1.5	1.5	5.0	5.0	2.0	2.0	3.0	3.0
Account	Merit Score	23	3.8	23	3.8	24	1.8	27	7.9	30).8	23	.3	30	.3
Account M	erit Rating	1	.0	1.	.0	1	.0	1.	.2	1	.3	1	.0	1.	3



Scenario 3: Technical Indicator Analysis

			Altern	ative A	Altern	ative B	Altern	ative C	Altern	ative D	Altern	ative E	Altern	ative F	Altern	ative G
Subaccount	Indicator	Weight	Value	Score	Value	Score	Value	Score								
	Storage to Dam Volume Ratio	1	4	4	2	2	1	1	1	1	1	1	6	6	1	1
	Dam Volume	1	5	5	1	1	2	2	1	1	1	1	6	6	1	1
Design Factors	Natural Topographic Containment	1	3	3	4	4	3	3	4	4	4	4	5	5	3	3
	Subaccount M	lerit Score		12		7	(6	(5		6	1	17		5
	Subaccount Me	rit Rating	4	l.0	2	.3	2	.0	2	.0	2	2.0	5	5.7	1	.7
		_					-		-	-	-		-			
	Monitoring Requirements	1	2	2	2	2	1	1	1	1	2	2	6	6	1	1
	Dam Height	1	4	4	4	4	6	6	1	1	1	1	4	4	2	2
Safety Factors	Impoundment Configuration	1	4	4	5	5	1	1	2	2	1	1	6	6	1	1
Surety ructors	Contaminant Management	1	5	5	5	5	2	2	6	6	2	2	5	5	4	4
	Subaccount N	lerit Score	-	15		16	1	0	1	0		6	2	21		8
	Subaccount Me	rit Rating	3	.8	4	l.0	2	.5	2	.5	1	.5	5	5.3	2	.0
					-	-										
	Length of Ditching	1	3	3	5	5	3	3	3	3	1	1	6	6	2	2
	Number of Pumps and Pipelines	1	2	2	5	5	2	2	4	4	4	4	1	1	5	5
Water	Impacts to Annual Water Balance	1	5	5	3	3	1	1	5	5	5	5	1	1	6	6
Management	Reclaim Water Return	1	1	1	5	5	4	4	5	5	6	6	1	1	5	5
	Subaccount M			11		18		0		7		16		9		8
	Subaccount Me	rit Rating	2	.8	4	.5	2	.5	4	.3	4	.0	2	2.3	4	.5
	Maximum Expansion Capacity	1	4	4	5	5	3	3	2	2	6	6	6	6	1	1
Expansion Capacity		lerit Score		4		5		3		2		6		6		1
	Subaccount Me	rit Rating	4	l.0	5	.0	3	.0	2	.0	6	i.0	6	5.0	1	.0
	•															
Compliance with	Ease of Obtaining Initial Permits	1	4	4	6	6	2	2	5	5	2	2	4	4	4	4
Environmental	Subaccount N	lerit Score		4		6	2	2		5		2		4		4
Approvals	Subaccount Me	rit Rating	4	l.0	6	i.0	2	.0	5	.0	2	2.0	4	l.0	4	.0
	Tailings Disposal	1	5	5	6	6	2	2	6	6	3	3	4	4	6	6
	Processing Complexity	1	4	4	5	5	2	2	5	5	2	2	4	4	5	5
Complexity of	Distance from the Mill	1	1	1	6	6	6	6	6	6	6	6	1	1	6	6
Operations	Elevation from the Mill	1	6	6	1	1	1	1	1	1	1	1	5	5	1	1
	Climatic Challenges	1	4	4	5	5	2	2	5	5	3	3	4	4	5	5
	Subaccount M			20		23		3		3		15		18		23
	Subaccount Me	rit Rating	4	l.0	4	.6	2	.6	4	.6	3	.0	3	.6	4	.6
	Material Availability	1	2	2	6	6	6	6	6	6	6	6	1	1	6	6
	Foundation Suitability	1	1	1	3	3	6	6	3	3	6	6	1	1	3	3
Constructability	Subaccount N			3		9		2	5		-	12		2		9
	Subaccount Me			.5		.5		.0		.5		i.0		.0		.5
			ļ				0		- 4				· · · ·		· · · · ·	

Subaccount	Weight	Rating	Score												
Design Factors	1	4.0	4.0	2.3	2.3	2.0	2.0	2.0	2.0	2.0	2.0	5.7	5.7	1.7	1.7
Safety Factors	1	3.8	3.8	4.0	4.0	2.5	2.5	2.5	2.5	1.5	1.5	5.3	5.3	2.0	2.0
Water Management	1	2.8	2.8	4.5	4.5	2.5	2.5	4.3	4.3	4.0	4.0	2.3	2.3	4.5	4.5
Expansion Capacity	1	4.0	4.0	5.0	5.0	3.0	3.0	2.0	2.0	6.0	6.0	6.0	6.0	1.0	1.0
Compliance with Environmental Approvals	1	4.0	4.0	6.0	6.0	2.0	2.0	5.0	5.0	2.0	2.0	4.0	4.0	4.0	4.0
Complexity of Operations	1	4.0	4.0	4.6	4.6	2.6	2.6	4.6	4.6	3.0	3.0	3.6	3.6	4.6	4.6
Constructability	1	1.5	1.5	4.5	4.5	6.0	6.0	4.5	4.5	6.0	6.0	1.0	1.0	4.5	4.5
Account M	erit Score	24	4.0	30).9	20).6	24	.9	24	4.5	27	7.8	22	2.3
Account Me	rit Rating	3	.4	4	.4	2	.9	3	.6	3	.5	4	.0	3	.2





Scenario 3: Project Economics Indicator Analysis

			Altern	ative A	Altern	ative B	Altern	ative C	Altern	ative D	Altern	ative E	Altern	ative F	Altern	ative G
Subaccount	Indicator	Weight	Value	Score												
	Initial Capital Costs	1	5	5	3	3	1	1	5	5	6	6	4	4	6	6
	Sustaining Capital Costs	1	4	4	6	6	1	1	2	2	1	1	6	6	1	1
	Operating Costs	1	6	6	3	3	1	1	6	6	4	4	6	6	6	6
Total Costs	Closure Costs	1	6	6	6	6	6	6	5	5	1	1	1	1	6	6
Total Costs	Post-Closure Costs	1	2	2	4	4	1	1	1	1	6	6	6	6	1	1
	Ancillary Costs	1	3	3	3	3	4	4	5	5	2	2	1	1	6	6
	Subaccount	Merit Score	2	26	2	25	1	4	ĩ	24	2	20	2	4	2	6
	Subaccount M	lerit Rating	4	.3	4	.2	2	.3	4	.0	3	.3	4	.0	4	.3
	Projected Timeline for Permits	1	1	1	4	4	1	1	4	4	5	5	1	1	1	1
Economic Risks	Projected Timeline for Start of Operations	1	4	4	6	6	2	2	5	5	1	1	4	4	4	4
LCOHOTTIC RISKS	Subaccount	Merit Score		5	1	0	3	3		9		6		5		5
	Subaccount M	lerit Rating	2	.5	5	.0	1	.5	4	.5	3	.0	2	.5	2	.5

Subaccount	Weight	Rating	Score												
Total Costs	1	4.3	4.3	4.2	4.2	2.3	2.3	4.0	4.0	3.3	3.3	4.0	4.0	4.3	4.3
Economic Risks	1	2.5	2.5	5.0	5.0	1.5	1.5	4.5	4.5	3.0	3.0	2.5	2.5	2.5	2.5
Account	Merit Score	6	.8	9	2	3.	8	8.	5	6.	.3	6.	5	6.	.8
Account N	erit Rating	3.	.4	4	.6	1.	9	4.	3	3.	.2	3.	3	3.	.4

Scenario 3: Socioeconomics Indicator Analysis

			Alterr	native A	Altern	ative B	Altern	ative C	Alterna	ative D	Altern	ative E	Altern	ative F	Altern	ative G
ubaccount	Indicator	Weight	Value	Score	Value	Score	Value	Score	Value	Score	Value	Score	Value	Score	Value	Score
	Loss of Recreational Fishing	1	1	1	4	4	4	4	4	4	5	5	1	1	6	6
	Loss of Commercial Forest Harvesting	1	6	6	4	4	6	6	4	4	4	4	1	1	4	4
Non-Indigenous Land Use	Loss of ATV Trails	1	6	6	2	2	2	2	1	1	4	4	1	1	3	3
Non-indigenous Land Ose	Loss of Private Land Ownership	1	2	2	6	6	6	6	6	6	6	6	1	1	6	6
	Subaccount	Merit Score		15		6	1	8	1	5	1	9		4		19
	Subaccount M	lerit Rating		3.8	4	.0	4	.5	3.	.8	4	.8	1	.0	4	1.8
	Fugitive Dust	1	5	5	5	5	2	2	6	6	3	3	4	4	6	6
	Hazard Potential to the Public	1	1	1	4	4	6	6	2	2	5	5	2	2	4	4
Human Health and Public Safety	Risk to Workers	1	6	6	6	6	4	4	5	5	1	1	6	6	5	5
	Subaccount	Merit Score		12		5	1	2	1	3	G	9	1	2		15
	Subaccount N	lerit Rating	4	4.0	5	.0	4	.0	4	.3	3	.0	4	.0	5	5.0
	•															
	Change in Aesthetics / Visual Impacts	1	4	4	4	4	6	6	1	1	1	1	4	4	2	2
On another set have a st	Noise Emissions	1	6	6	1	1	2	2	1	1	1	1	6	6	2	2
Operational Impact	Subaccount	Merit Score		10		5		8	ź	2	ź	2	1	0		4
	Subaccount N	lerit Rating		5.0	2	.5	4	.0	1.	.0	1.	.0	5	.0	2	2.0
			•													
	Loss of Local Jobs and Business Opportunities	1	4	4	4	4	1	1	3	3	1	1	5	5	3	3
Local Economic Risk	Subaccount	Merit Score		4		4		1		3		1		5		3
	Subaccount N	lerit Rating	4	4.0	4	.0	1	.0	3.	.0	1	.0	5	.0	3	3.0

Subaccount	Weight	Rating	Score												
Non-Indigenous Land Use	1	3.8	4	4.0	4	4.5	5	3.8	4	4.8	5	1.0	1	4.8	5
Human Health and Public Safety	1	4.0	4	5.0	5	4.0	4	4.3	4	3.0	3	4.0	4	5.0	5
Operational Impact	1	5.0	5	2.5	3	4.0	4	1.0	1	1.0	1	5.0	5	2.0	2
Local Economic Risk	1	4.0	4	4.0	4	1.0	1	3.0	3	1.0	1	5.0	5	3.0	3
Account	Merit Score	1	7	1	6	1	4	1	2	1	0	1	5	1	5
Account	/lerit Rating	4	.2	3.	.9	3.	4	3	.0	2	.4	3.	8	3.	.7

Atlantic Gold A St Barbara Ltd Company



Scenario 3: Environmental Account Analysis

		Altern	ative A	Altern	ative B	Altern	ative C	Altern	ative D	Altern	ative E	Altern	ative F	Altern	ative G
Subaccount	Weight	Rating	Score												
Water Quality	1	3.5	3.5	3.5	3.5	3.5	3.5	5.0	5.0	3.0	3.0	2.5	2.5	3.5	3.5
Hydrology	1	3.0	3.0	3.0	3.0	3.0	3.0	3.0	3.0	3.0	3.0	5.0	5.0	3.0	3.0
Aquatic Resources	1	5.7	5.7	5.7	5.7	5.3	5.3	6.0	6.0	6.0	6.0	3.3	3.3	6.0	6.0
Terrestrial Resources	1	1.0	1.0	1.0	1.0	2.3	2.3	2.8	2.8	3.8	3.8	1.3	1.3	4.3	4.3
Sensitive Species	1	3.0	3.0	3.0	3.0	2.5	2.5	5.0	5.0	6.0	6.0	1.5	1.5	5.5	5.5
Atmospheric Emissions	1	3.7	3.7	3.7	3.7	1.7	1.7	3.7	3.7	2.0	2.0	4.7	4.7	4.0	4.0
Protected Areas	1	1.0	1.0	1.0	1.0	1.0	1.0	1.0	1.0	2.0	2.0	3.0	3.0	1.0	1.0
Hazard Potential to the Environment	1	3.0	3.0	3.0	3.0	5.5	5.5	1.5	1.5	5.0	5.0	2.0	2.0	3.0	3.0
Account	Merit Score	2	3.8	23	3.8	24	1.8	27	7.9	30).8	23	3.3	30	0.3
Account M	erit Rating	1	.0	1	.0	1	.0	1	.2	1	.3	1	.0	1	.3

Scenario 3: Technical Account Analysis

		Alterna	ative A	Altern	ative B	Altern	ative C	Alterna	ative D	Alterna	ative E	Altern	ative F	Altern	ative G
Subaccount	Weight	Rating	Score	Rating	Score	Rating	Score	Rating	Score	Rating	Score	Rating	Score	Rating	Score
Design Factors	1	4.0	4.0	2.3	2.3	2.0	2.0	2.0	2.0	2.0	2.0	5.7	5.7	1.7	1.7
Safety Factors	1	3.8	3.8	4.0	4.0	2.5	2.5	2.5	2.5	1.5	1.5	5.3	5.3	2.0	2.0
Water Management	1	2.8	2.8	4.5	4.5	2.5	2.5	4.3	4.3	4.0	4.0	2.3	2.3	4.5	4.5
Expansion Capacity	1	4.0	4.0	5.0	5.0	3.0	3.0	2.0	2.0	6.0	6.0	6.0	6.0	1.0	1.0
Compliance with Environmental Approvals	1	4.0	4.0	6.0	6.0	2.0	2.0	5.0	5.0	2.0	2.0	4.0	4.0	4.0	4.0
Complexity of Operations	1	4.0	4.0	4.6	4.6	2.6	2.6	4.6	4.6	3.0	3.0	3.6	3.6	4.6	4.6
Constructability	1	1.5	1.5	4.5	4.5	6.0	6.0	4.5	4.5	6.0	6.0	1.0	1.0	4.5	4.5
Account M	erit Score	24	1.0	30).9	20).6	24	.9	24	1.5	27	7.8	22	2.3
Account Me	rit Rating	3	.4	4	.4	2	.9	3.	.6	3.	.5	4	.0	3	.2



Scenario 3: Project Economics Account Analysis

		Altern	ative A	Altern	ative B	Altern	ative C	Alterna	ative D	Altern	ative E	Alterna	ative F	Alterna	ative G
Subaccount	Weight	Rating	Score	Rating	Score	Rating	Score	Rating	Score	Rating	Score	Rating	Score	Rating	Score
Total Costs	1	4.3	4.3	4.2	4.2	2.3	2.3	4.0	4.0	3.3	3.3	4.0	4.0	4.3	4.3
Economic Risks	1	2.5	2.5	5.0	5.0	1.5	1.5	4.5	4.5	3.0	3.0	2.5	2.5	2.5	2.5
A	ccount Merit Score	6	.8	9	.2	3	.8	8	.5	6	.3	6.	5	6	.8
Acc	ount Merit Rating	3	.4	4	.6	1.	.9	4	.3	3.	.2	3.	3	3	.4

Scenario 3: Socioeconomics Account Analysis

		Altern	ative A	Altern	ative B	Alterna	ative C	Alterna	ative D	Altern	ative E	Alterna	ative F	Altern	ative G
Subaccount	Weight	Rating	Score	Rating	Score	Rating	Score	Rating	Score	Rating	Score	Rating	Score	Rating	Score
Non-Indigenous Land Use	1	3.8	4	4.0	4	4.5	5	3.8	4	4.8	5	1.0	1	4.8	5
Human Health and Public Safety	1	4.0	4	5.0	5	4.0	4	4.3	4	3.0	3	4.0	4	5.0	5
Operational Impact	1	5.0	5	2.5	3	4.0	4	1.0	1	1.0	1	5.0	5	2.0	2
Local Economic Risk	1	4.0	4	4.0	4	1.0	1	3.0	3	1.0	1	5.0	5	3.0	3
	Account Merit Score	1	7	1	6	1	4	1	2	1	0	1	5	1	5
	Account Merit Rating	4	.2	3.	.9	3.	.4	3.	.0	2	.4	3.	8	3	.7

Scenario 3: All Weights Equal Summary

		Alterna	ative A	Altern	ative B	Altern	ative C	Alterna	ative D	Altern	ative E	Altern	ative F	Altern	ative G
Account	Weight	Rating	Score	Rating	Score	Rating	Score	Rating	Score	Rating	Score	Rating	Score	Rating	Score
Environment	1	1.0	1	1.0	1	1.0	1	1.2	1	1.3	1	1.0	1	1.3	1
Technical	1	3.4	3	4.4	4	2.9	3	3.6	4	3.5	4	4.0	4	3.2	3
Economics	1	3.4	3	4.6	5	1.9	2	4.3	4	3.2	3	3.3	3	3.4	3
Socioeconomics	1	4.2	4	3.9	4	3.4	3	3.0	3	2.4	2	3.8	4	3.7	4
Alternative	Merit Score	12	.0	13	3.9	9	.3	12	2.0	10).4	11	1.9	1.	1.6
Alternative N	lerit Rating	3	.0	3	.5	2	.3	3.	.0	2	.6	3	.0	2	.9



Scenario 4: Prioritize People



Scenario 4: Prioritize People Weight Summary

Account	Weighting	Sub-account	Weighting	Indicator	Weighting
Environment	4	Water Quality	5	Water Treatment Requirements	6
				Flexibility for Water Treatment and Recycle	2
		Hydrology	3	Catchment Area	5
				Number of Affected Sub-watersheds	5
		Aquatic Resources	6	Loss of Fish Habitat (waterbody)	5
				Loss of Fish Habitat (watercourse)	6
				Number of new crossings	3
		Terrestrial Resources	2	Loss of Wetland	5
				Use of Disturbed Habitat	6
				Footprint	3
				Loss of Forest	5
		Sensitive Species	3	Loss of Mainland Moose Habitat	4
				Loss of Brook Trout Habitat	6
		Atmospheric Emissions	4	Fugitive Dust	6
				GHG Emissions	5
				Noise Emissions	3
		Protected Areas	1	Proximity to Protected Areas	1
		Hazard Potential to the Environment	6	Magnitude of Failure	2
				Downstream Sensitivities	6
Technical	2	Design Factors	3	Storage to Dam Volume Ratio	4
		5	-	Dam Volume	6
				Natural Topographic Containment	2
		Safety Factors	6	Monitoring Requirements	3
			-	Dam Height	6
				Impoundment Configuration	6
				Contaminant Management	5
		Water Management	5	Length of Ditching	3
			-	Number of Pumps and Pipelines	3
				Impacts to Annual Water Balance	4
				Reclaim Water Return	6
		Expansion Capacity	2	Maximum Expansion Capacity	6
		Compliance with Environmental	-		, , , , , , , , , , , , , , , , , , ,
		Approvals	5	Ease of Obtaining Initial Permits	1
		Complexity of Operations	4	Tailings Disposal	6
				Processing Complexity	5
				Distance from the Mill	5
				Elevation from the Mill	3
				Climatic Challenges	4
		Constructability	4	Material Availability	4
				Foundation Suitability	6
Economics	1	Total Costs	6	Initial Capital Costs	5
			-	Sustaining Capital Costs	4
				Operating Costs	6
				Closure Costs	2
				Post-Closure Costs	2
				Ancillary Costs	4
		Economic Risks	4	Projected Timeline for Permits	6
				Projected Timeline for Start of Operations	5
Socioeconomics	6	Non-Indigenous Land Use	3	Loss of Recreational Fishing	2
2.2.0.00000000000	Ŭ			Loss of Commercial Forest Harvesting	4
				Loss of ATV Trails	2
				Loss of Private Land Ownership	2
	<u> </u>	Human Health and Public Safety	5	Fugitive Dust	5
		and rubic barety	5	Hazard Potential to the Public	6
				Risk to Workers	6
		Operational Impact	3	Change in Aesthetics / Visual Impacts	4
			3	Noise Emissions	3
		Local Economic Risk	2	Loss of Local Jobs and Business Opportunities	3
L			۷	Loss of Local Jobs and Busiliess Opportuilities	



Scenario 4: Environmental Indicator Analysis

			Alterr	native A	Altern	ative B	Altern	ative C	Altern	ative D	Alterr	native E	Altern	native F	Altern	ative G
baccount	Indicator	Weight	Value	Score	Value	Score	Value	Score	Value	Score	Value	Score	Value	Score	Value	Scor
	Water Treatment Requirements	6	4	24	5	30	2	12	6	36	1	6	3	18	5	30
	Flexibility for Water Treatment and Recycle	2	3	6	2	4	5	10	4	8	5	10	2	4	2	4
Water Quality	Subaccount	Merit Score		30		34	ź	22	4	14		16	á	22		34
	Subaccount M	erit Rating		3.8	4	.3	2	.8	5	.5	2	2.0	2	2.8	4	.3
	•	-														
	Catchment Area	5	1	5	1	5	1	5	2	10	2	10	4	20	1	5
	Number of Affected Sub-watersheds	5	5	25	5	25	5	25	4	20	4	20	6	30	5	2
Hydrology	Subaccount	Merit Score		30	3	30		30	3	30		30	5	50		30
	Subaccount M	erit Rating		3.0	3	.0	3	.0	3	.0	3	3.0	5	5.0	3	.0
	Loss of Fish Habitat (waterbody)	5	6	30	6	30	6	30	6	30	6	30	5	25	6	3
	Loss of Fish Habitat (watercourse)	6	5	30	5	30	4	24	6	36	6	36	1	6	6	3
Aquatic Resources	Number of new crossings	3	6	18	6	18	6	18	6	18	6	18	4	12	6	1
4	Subaccount	Merit Score		78		78		12		34	- 1	84	4	43		34
	Subaccount M			5.6		.6		.1		i.0		5.0		s.1		i.0
		j														
	Loss of Wetland	5	1	5	1	5	1	5	4	20	6	30	2	10	4	2
	Use of Disturbed Habitat	6	1	6	1	6	2	12	1	6	1	6	1	6	5	3
	Footprint	3	1	3	1	3	3	9	3	9	4	12	1	3	4	1
Terrestrial Resources	Loss of Forest	5	1	5	1	5	3	15	3	15	4	20	1	5	4	2
	Subaccount I			19		19		11	-	50		68		24		32
	Subaccount M			1.0		.0		.2		2.6		3.6		.3		i.3
											-					
	Loss of Mainland Moose Habitat	4	1	4	1	4	1	4	4	16	6	24	2	8	5	2
	Loss of Brook Trout Habitat	6	5	30	5	30	4	24	6	36	6	36	1	6	6	3
Sensitive Species	Loss of Canada Warbler Habitat	0	1	0	1	0	2	0	4	0	6	0	1	0	5	(
	Subaccount	Merit Score		34		34		28		52		60		14	-	56
	Subaccount M			3.4		.4		.8		.2		5.0		.4		.6
	Fugitive Dust	6	5	30	5	30	2	12	6	36	3	18	4	24	6	3
	GHG Emissions	5	5	25	5	25	1	5	4	20	2	10	4	20	4	2
Atmospheric Emissions	Noise Emissions	3	1	3	1	3	2	6	1	3	1	3	6	18	2	
	Subaccount	-		58		58		23		59		31	-	52		52
	Subaccount M			4.1		.1		.6		.2		2.2		.4		.4
	Subaccount in	entrating			1	••			ļ	-			ļ			
	Proximity to Protected Areas	1	1	1	1	1	1	1	1	1	2	2	3	3	1	· ·
Protected Areas	Subaccount I	Merit Score		1		1	· ·	1		1		2	-	3	· · ·	1
Trottered Fileds	Subaccount M			1.0		.0		.0		.0		2.0		<u>.</u> 0		.0
	Subaccount M	ent raulig	1		1		· ·		· ·		L 4					
	Magnitude of Failure	2	2	4	2	4	5	10	1	2	5	10	2	4	2	4
Hazard Potential to the	Downstream Sensitivities	6	4	24	4	24	6	36	2	12	5	30	2	12	4	2
Environment	Subaccount I			24		24		16		12	-	40		12		28
Environment				28 3.5		.5		.8				40 5.0		2.0		28 1.5
	Subaccount M	erit kating		5.5	1 3		5	.8		.8	1 5	.	4		1 3	

Subaccount	Weight	Rating	Score												
Water Quality	5	3.8	18.8	4.3	21.3	2.8	13.8	5.5	27.5	2.0	10.0	2.8	13.8	4.3	21.3
Hydrology	3	3.0	9.0	3.0	9.0	3.0	9.0	3.0	9.0	3.0	9.0	5.0	15.0	3.0	9.0
Aquatic Resources	6	5.6	33.4	5.6	33.4	5.1	30.9	6.0	36.0	6.0	36.0	3.1	18.4	6.0	36.0
Terrestrial Resources	2	1.0	2.0	1.0	2.0	2.2	4.3	2.6	5.3	3.6	7.2	1.3	2.5	4.3	8.6
Sensitive Species	3	3.4	10.2	3.4	10.2	2.8	8.4	5.2	15.6	6.0	18.0	1.4	4.2	5.6	16.8
Atmospheric Emissions	4	4.1	16.6	4.1	16.6	1.6	6.6	4.2	16.9	2.2	8.9	4.4	17.7	4.4	17.7
Protected Areas	1	1.0	1.0	1.0	1.0	1.0	1.0	1.0	1.0	2.0	2.0	3.0	3.0	1.0	1.0
Hazard Potential to the Environment	6	3.5	21.0	3.5	21.0	5.8	34.5	1.8	10.5	5.0	30.0	2.0	12.0	3.5	21.0
Account	Aerit Score	11	2.0	11	4.5	10	8.4	12	1.7	12	1.0	86	5.6	13	1.4
Account M	erit Rating	4	.4	4	.5	4	.3	4	.8	4	.8	3	.4	5.	.2





Scenario 4: Technical Indicator Analysis

			Alterna	ative A	Altern	ative B	Altern	ative C	Alterna	ative D	Altern	ative E	Altern	ative F	Altern	ative G
Subaccour	Indicator	Weight	Value	Score	Value	Score	Value	Score	Value	Score	Value	Score	Value	Score	Value	Score
	Storage to Dam Volume Ratio	4	4	16	2	8	1	4	1	4	1	4	6	24	1	4
Design	Dam Volume	6	5	30	1	6	2	12	1	6	1	6	6	36	1	6
Factors	Natural Topographic Containment	2	3	6	4	8	3	6	4	8	4	8	5	10	3	6
Factors	Subaccount Me	erit Score	5	2	2	2	2	2	1	8	1	18	7	0	1	6
	Subaccount Mer	it Rating	4	.3	1.	.8	1	.8	1	.5	1	.5	5	.8	1	.3
	ſ										r	r	-		r	1
	Monitoring Requirements	3	2	6	2	6	1	3	1	3	2	6	6	18	1	3
	Dam Height	6	4	24	4	24	6	36	1	6	1	6	4	24	2	12
Safety	Impoundment Configuration	6	4	24	5	30	1	6	2	12	1	6	6	36	1	6
Factors	Contaminant Management	5	5	25	5	25	2	10	6	30	2	10	5	25	4	20
	Subaccount Me	erit Score	7		8			5	5			28	1(4	
	Subaccount Mer	it Rating	4	.0	4	.3	2	.8	2	.6	1	.4	5	.2	2	.1
	Length of Ditching	3	3	9	5	15	3	9	3	9	1	3	6	18	2	6
	Number of Pumps and Pipelines	3	2	6	5	15	2	6	4	12	4	12	1	3	5	15
Water	Impacts to Annual Water Balance	4	5	20	3	12	1	4	5	20	5	20	1	4	6	24
1anagem	Reclaim Water Return	6	1	6	5	30	4	24	5	30	6	36	1	6	5	30
ent	Subaccount Me		4		-	2		3	5			71	3			5
	Subaccount Mer		2			.5		.7		.4		.4	1			.7
	Subaccount men	it kating		.0	-	.5	2	.1	-	.4				.5		
xpansion	Maximum Expansion Capacity	6	4	24	5	30	3	18	2	12	6	36	6	36	1	6
Capacity	Subaccount Me	erit Score	2	4	3	0	1	8	1	2	3	36	3	6		5
cupucity	Subaccount Mer	it Rating	4	.0	5.	.0	3	.0	2	.0	6	.0	6	.0	1	.0
.ompiian	Ease of Obtaining Initial Permits	1	4	4	6	6	2	2	5	5	2	2	4	4	4	4
ce with																<u> </u>
Invironm	Subaccount Me		4		(2		5		2	4			4
optal	Subaccount Mer	it Rating	4	.0	6	.0	2	.0	5	.0	2	.0	4	.0	4	.0
	Tailings Disposal	6	5	30	6	36	2	12	6	36	3	18	4	24	6	36
	Processing Complexity	5	4	20	5	25	2	10	5	25	2	10	4	20	5	25
Complexit	Distance from the Mill	5	1	5	6	30	6	30	6	30	6	30	1	5	6	30
y of	Elevation from the Mill	3	6	18	1	3	1	3	1	3	1	3	5	15	1	3
peration	Climatic Challenges	4	4	16	5	20	2	8	5	20	3	12	4	16	5	20
S	Subaccount Mer	it Score	8	9	1	14		3	1	14	1	73	8		1	14
	Subaccount Merit	Rating	3	.9	5.	.0	2	.7	5	.0	3	.2	3	.5	5	.0
									<i>c</i>							
	Material Availability	4	2	8	6	24	6	24	6	24	6	24	1	4	6	24
	Foundation Suitability	6	1	6	3	18	6	36	3	18	6	36	1	6	3	18
ability	Subaccount Mer			4		2		0		2		50	1			2
	Subaccount Merit Rating			4	4	.2	6	.0	4	.2	1 6	i.O	1	.0	1 4	.2

Subaccount	Weight	Rating	Score												
Design Factors	3	4.3	13.0	1.8	5.5	1.8	5.5	1.5	4.5	1.5	4.5	5.8	17.5	1.3	4.0
Safety Factors	6	4.0	23.7	4.3	25.5	2.8	16.5	2.6	15.3	1.4	8.4	5.2	30.9	2.1	12.3
Water Management	5	2.6	12.8	4.5	22.5	2.7	13.4	4.4	22.2	4.4	22.2	1.9	9.7	4.7	23.4
Expansion Capacity	2	4.0	8.0	5.0	10.0	3.0	6.0	2.0	4.0	6.0	12.0	6.0	12.0	1.0	2.0
Compliance with Environmental Approvals	5	4.0	20.0	6.0	30.0	2.0	10.0	5.0	25.0	2.0	10.0	4.0	20.0	4.0	20.0
Complexity of Operations	4	3.9	15.5	5.0	19.8	2.7	11.0	5.0	19.8	3.2	12.7	3.5	13.9	5.0	19.8
Constructability	4	1.4	5.6	4.2	16.8	6.0	24.0	4.2	16.8	6.0	24.0	1.0	4.0	4.2	16.8
Account Me	it Score	98	1.6	130	0.1	86	5.4	10	7.6	93	8.8	10	8.0	98	5.4
Account Meri	t Rating	3.	.4	4.	.5	3	.0	3.	.7	3.	.2	3.	.7	3.	.4

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Scenario 4: Project Economics Indicator Analysis

			Altern	ative A	Altern	ative B	Altern	ative C	Altern	ative D	Altern	ative E	Altern	ative F	Altern	ative G
Subaccount	Indicator	Weight	Value	Score												
	Initial Capital Costs	5	5	25	3	15	1	5	5	25	6	30	4	20	6	30
	Sustaining Capital Costs	4	4	16	6	24	1	4	2	8	1	4	6	24	1	4
	Operating Costs	6	6	36	3	18	1	6	6	36	4	24	6	36	6	36
Total Costs	Closure Costs	2	6	12	6	12	6	12	5	10	1	2	1	2	6	12
Total Costs	Post-Closure Costs	2	2	4	4	8	1	2	1	2	6	12	6	12	1	2
	Ancillary Costs	4	3	12	3	12	4	16	5	20	2	8	1	4	6	24
	Subaccount Merit Score		1	05	8	9	4	15	10	01	8	0	ç	8	10	08
	Subaccount Merit Rating		4	.6	3	.9	2	.0	4	.4	3	.5	4	.3	4	.7
	Projected Timeline for Permits	6	1	6	4	24	1	6	4	24	5	30	1	6	1	6
Economic Risks	Projected Timeline for Start of Operations	5	4	20	6	30	2	10	5	25	1	5	4	20	4	20
LCOHOTTIC RISKS	Subaccount Merit Score		2	26	5	4	1	6	4	9	3	5	2	16	2	6
	Subaccount Merit Rating		2	.4	4	.9	1	.5	4	.5	3	.2	2	.4	2	.4

Subaccount	Weight	Rating	Score												
Total Costs	6	4.6	27.4	3.9	23.2	2.0	11.7	4.4	26.3	3.5	20.9	4.3	25.6	4.7	28.2
Economic Risks	4	2.4	9.5	4.9	19.6	1.5	5.8	4.5	17.8	3.2	12.7	2.4	9.5	2.4	9.5
Account Merit Score		36	5.8	42	.9	17	.6	44	.2	33	8.6	35	.0	37	.6
Account Merit Rating		3.	.7	4.	.3	1.	8	4.	4	3.	.4	3.	5	3.	.8



Scenario 4: Socioeconomics Indicator Analysis

			Alterr	native A	Altern	ative B	Altern	ative C	Altern	ative D	Altern	ative E	Altern	ative F	Altern	ative G
Subaccount	Indicator	Weight	Value	Score	Value	Score	Value	Score	Value	Score	Value	Score	Value	Score	Value	Score
	Loss of Recreational Fishing	2	1	2	4	8	4	8	4	8	5	10	1	2	6	12
	Loss of Commercial Forest Harvesting	4	6	24	4	16	6	24	4	16	4	16	1	4	4	16
Non-Indigenous Land Use	Loss of ATV Trails	2	6	12	2	4	2	4	1	2	4	8	1	2	3	6
Non-Indigenous Land Ose	Loss of Private Land Ownership	2	2	4	6	12	6	12	6	12	6	12	1	2	6	12
	Subaccoun	Merit Score	4	42	4	10	4	8	3	8	4	6	1	0	4	46
	Subaccount	Merit Rating	4	4.2	4	.0	4	.8	3	.8	4	.6	1	.0	4	1.6
			-												-	
	Fugitive Dust	5	5	25	5	25	2	10	6	30	3	15	4	20	6	30
	Hazard Potential to the Public	6	1	6	4	24	6	36	2	12	5	30	2	12	4	24
Human Health and Public Safety	Risk to Workers	6	6	36	6	36	4	24	5	30	1	6	6	36	5	30
	Subaccoun	Merit Score	(67	8	35	7	0	7	2	5	1	6	8	8	34
	Subaccount	Merit Rating		3.9	5	.0	4	.1	4	.2	3	.0	4	.0	4	1.9
	Change in Aesthetics / Visual Impacts	4	4	16	4	16	6	24	1	4	1	4	4	16	2	8
Operational Impact	Noise Emissions	3	6	18	1	3	2	6	1	3	1	3	6	18	2	6
Operational impact	Subaccoun	Merit Score	;	34	ŕ	9	3	0		7	-	7	3	4	1	14
	Subaccount	Merit Rating	4	4.9	2	.7	4	.3	1	.0	1	.0	4	.9	2	2.0
	Loss of Local Jobs and Business Opportunities	1	4	4	4	4	1	1	3	3	1	1	5	5	3	3
Local Economic Risk	Subaccoun	Merit Score		4		4		1		3		1		5		3
	Subaccount	Merit Rating	4	4.0	4	.0	1	.0	3	.0	1	.0	5	.0	3	3.0

Subaccount	Weight	Rating	Score												
Non-Indigenous Land Use	3	4.2	13	4.0	12	4.8	14	3.8	11	4.6	14	1.0	3	4.6	14
Human Health and Public Safety	5	3.9	20	5.0	25	4.1	21	4.2	21	3.0	15	4.0	20	4.9	25
Operational Impact	3	4.9	15	2.7	8	4.3	13	1.0	3	1.0	3	4.9	15	2.0	6
Local Economic Risk	2	4.0	8	4.0	8	1.0	2	3.0	6	1.0	2	5.0	10	3.0	6
Account	Merit Score	5	5	5	3	5	0	4	2	3	4	4	8	5	1
Account N	lerit Rating	4.	.2	4.	.1	3	.8	3.	.2	2.	.6	3.	.7	3.	.9



Scenario 4: Environmental Account Analysis

		Altern	ative A	Altern	ative B	Altern	ative C	Altern	ative D	Altern	ative E	Altern	ative F	Altern	ative G
Subaccount	Weight	Rating	Score												
Water Quality	5	3.8	18.8	4.3	21.3	2.8	13.8	5.5	27.5	2.0	10.0	2.8	13.8	4.3	21.3
Hydrology	3	3.0	9.0	3.0	9.0	3.0	9.0	3.0	9.0	3.0	9.0	5.0	15.0	3.0	9.0
Aquatic Resources	6	5.6	33.4	5.6	33.4	5.1	30.9	6.0	36.0	6.0	36.0	3.1	18.4	6.0	36.0
Terrestrial Resources	2	1.0	2.0	1.0	2.0	2.2	4.3	2.6	5.3	3.6	7.2	1.3	2.5	4.3	8.6
Sensitive Species	3	3.4	10.2	3.4	10.2	2.8	8.4	5.2	15.6	6.0	18.0	1.4	4.2	5.6	16.8
Atmospheric Emissions	4	4.1	16.6	4.1	16.6	1.6	6.6	4.2	16.9	2.2	8.9	4.4	17.7	4.4	17.7
Protected Areas	1	1.0	1.0	1.0	1.0	1.0	1.0	1.0	1.0	2.0	2.0	3.0	3.0	1.0	1.0
Hazard Potential to the Environment	6	3.5	21.0	3.5	21.0	5.8	34.5	1.8	10.5	5.0	30.0	2.0	12.0	3.5	21.0
Account	Merit Score	11	2.0	11	4.5	10	8.4	12	1.7	12	1.0	86	5.6	13	1.4
Account M	erit Rating	4	.4	4	.5	4	.3	4	.8	4	.8	3	.4	5	.2

Scenario 4: Technical Account Analysis

		Alterna	ative A	Altern	ative B	Altern	ative C	Alterna	ative D	Altern	ative E	Altern	ative F	Alterna	ative G
Subaccount	Weight	Rating	Score	Rating	Score	Rating	Score	Rating	Score	Rating	Score	Rating	Score	Rating	Score
Design Factors	3	4.3	13.0	1.8	5.5	1.8	5.5	1.5	4.5	1.5	4.5	5.8	17.5	1.3	4.0
Safety Factors	6	4.0	23.7	4.3	25.5	2.8	16.5	2.6	15.3	1.4	8.4	5.2	30.9	2.1	12.3
Water Management	5	2.6	12.8	4.5	22.5	2.7	13.4	4.4	22.2	4.4	22.2	1.9	9.7	4.7	23.4
Expansion Capacity	2	4.0	8.0	5.0	10.0	3.0	6.0	2.0	4.0	6.0	12.0	6.0	12.0	1.0	2.0
Compliance with Environmental Approvals	5	4.0	20.0	6.0	30.0	2.0	10.0	5.0	25.0	2.0	10.0	4.0	20.0	4.0	20.0
Complexity of Operations	4	3.9	15.5	5.0	19.8	2.7	11.0	5.0	19.8	3.2	12.7	3.5	13.9	5.0	19.8
Constructability	4	1.4	5.6	4.2	16.8	6.0	24.0	4.2	16.8	6.0	24.0	1.0	4.0	4.2	16.8
Account Mer	it Score	98	3.6	13	0.1	86	5.4	10	7.6	93	3.8	10	8.0	98	3.4
Account Merit	Rating	3	.4	4	.5	3	.0	3.	.7	3.	.2	3	.7	3	.4



Scenario 4: Project Economics Account Analysis

		Altern	ative A	Altern	ative B	Altern	ative C	Alterna	ative D	Alterna	ative E	Alterna	ative F	Alterna	ative G
Subaccount	Weight	Rating	Score	Rating	Score	Rating	Score	Rating	Score	Rating	Score	Rating	Score	Rating	Score
Total Costs	6	4.6	27.4	3.9	23.2	2.0	11.7	4.4	26.3	3.5	20.9	4.3	25.6	4.7	28.2
Economic Risks	4	2.4	9.5	4.9	19.6	1.5	5.8	4.5	17.8	3.2	12.7	2.4	9.5	2.4	9.5
Account	Merit Score	36	5.8	42	2.9	17	.6	44	.2	33	.6	35	.0	37	7.6
Account N	erit Rating	3.	.7	4	.3	1.	.8	4	.4	3.	.4	3.	.5	3	.8

Scenario 4: Socioeconomics Account Analysis

		Altern	ative A	Altern	ative B	Altern	ative C	Alterna	ative D	Altern	ative E	Alterna	ative F	Alterna	ative G
Subaccount	Weight	Rating	Score	Rating	Score	Rating	Score	Rating	Score	Rating	Score	Rating	Score	Rating	Score
Non-Indigenous Land Use	3	4.2	13	4.0	12	4.8	14	3.8	11	4.6	14	1.0	3	4.6	14
Human Health and Public Safety	5	3.9	20	5.0	25	4.1	21	4.2	21	3.0	15	4.0	20	4.9	25
Operational Impact	3	4.9	15	2.7	8	4.3	13	1.0	3	1.0	3	4.9	15	2.0	6
Local Economic Risk	2	4.0	8	4.0	8	1.0	2	3.0	6	1.0	2	5.0	10	3.0	6
	Account Merit Score	5	5	5	3	5	0	4	2	3	4	4	8	5	51
Ac	count Merit Rating	4	.2	4.	.1	3	.8	3	.2	2	.6	3.	.7	3	.9

Scenario 4: Prioritize People Weights Summary

		Alterna	ative A	Altern	ative B	Altern	ative C	Alterna	ative D	Altern	ative E	Altern	ative F	Alterna	ative G
Account	Weight	Rating	Score	Rating	Score	Rating	Score	Rating	Score	Rating	Score	Rating	Score	Rating	Score
Environment	4	4.4	18	4.5	18	4.3	17	4.8	19	4.8	19	3.4	14	5.2	21
Technical	2	3.4	7	4.5	9	3.0	6	3.7	7	3.2	6	3.7	7	3.5	7
Economics	1	3.7	4	4.3	4	1.8	2	4.4	4	3.4	3	3.5	4	3.8	4
Socioeconomics	6	4.2	25	4.1	25	3.8	23	3.2	19	2.6	16	3.7	22	3.9	23
Alternative M	erit Score	5	3	5	6	4	8	5	0	4	5	4	7	5	5
Alternative Me	rit Rating	4	.1	4.	.3	3	.7	3.	.9	3	.4	3	.6	4	.2



Scenario 5: Prioritize Water

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Scenario 5: Prioritize Water Weight Summary

Account	Weighting	Sub-account	Weighting	Indicator	Weightin
Environment	6	Water Quality	6	Water Treatment Requirements	6
				Flexibility for Water Treatment and Recycle	6
		Hydrology	6	Catchment Area	6
				Number of Affected Sub-watersheds	6
		Aquatic Resources	6	Loss of Fish Habitat (waterbody)	6
				Loss of Fish Habitat (watercourse)	6
				Number of new crossings	3
		Terrestrial Resources	2	Loss of Wetland	5
				Use of Disturbed Habitat	6
				Footprint	3
				Loss of Forest	5
		Sensitive Species	3	Loss of Mainland Moose Habitat	4
				Loss of Brook Trout Habitat	6
		Atmospheric Emissions	4	Fugitive Dust	6
				GHG Emissions	5
				Noise Emissions	3
		Protected Areas	1	Proximity to Protected Areas	1
		Hazard Potential to the Environment	6	Magnitude of Failure	2
				Downstream Sensitivities	6
[ochnical	3	Design Factors	3	Storage to Dam Volume Ratio	4
[echnical	5		5	Dam Volume	4
		Cofeto Footo a	6	Natural Topographic Containment	2
		Safety Factors	6	Monitoring Requirements	3
				Dam Height	6
				Impoundment Configuration	6
				Contaminant Management	5
		Water Management	6	Length of Ditching	6
				Number of Pumps and Pipelines	6
				Impacts to Annual Water Balance	6
				Reclaim Water Return	6
		Expansion Capacity	2	Maximum Expansion Capacity	6
		Compliance with Environmental Approvals	5	Ease of Obtaining Initial Permits	1
		Complexity of Operations	4	Tailings Disposal	6
				Processing Complexity	5
				Distance from the Mill	5
				Elevation from the Mill	3
				Climatic Challenges	4
		Constructability	4	Material Availability	4
		Constructability	4	Foundation Suitability	
·	1.5	Total Costs	6	Initial Capital Costs	6
conomics	1.5		6	· · ·	5
				Sustaining Capital Costs	-
				Operating Costs	6
				Closure Costs	2
	ł			Post-Closure Costs	2
		Free second a Dista	<u> </u>	Ancillary Costs	6
		Economic Risks	4	Projected Timeline for Permits	6
			ļ	Projected Timeline for Start of Operations	5
Socioeconomics	3	Non-Indigenous Land Use	3	Loss of Recreational Fishing	6
				Loss of Commercial Forest Harvesting	4
	ļ		ļ	Loss of ATV Trails	2
				Loss of Private Land Ownership	2
		Human Health and Public Safety	5	Fugitive Dust	5
				Hazard Potential to the Public	6
				Risk to Workers	6
		Operational Impact	3	Change in Aesthetics / Visual Impacts	4
				Noise Emissions	3
		Local Economic Risk	2	Loss of Local Jobs and Business Opportunities	1



Scenario 5: Environmental Indicator Analysis

			Alterr	native A	Alter	native B	Altern	ative C	Altern	ative D		ative E	Alterr	native F	Alter	native G
ıbaccount	Indicator	Weight	Value	Score	Value	Score	Value	Score	Value	Score	Value	Score	Value	Score	Value	Score
	Water Treatment Requirements	6	4	24	5	30	2	12	6	36	1	6	3	18	5	30
Water Quality	Flexibility for Water Treatment and Recycle	6	3	18	2	12	5	30	4	24	5	30	2	12	2	12
water Quality	Subaccount	Merit Score		42		42	4	2	6	50	~~~	36		30		42
	Subaccount N	Aerit Rating		3.5	3	3.5	3	.5	5	.0	3	.0	2	2.5	3	3.5
	Catchment Area	6	1	6	1	6	1	6	2	12	2	12	4	24	1	6
the share be seen	Number of Affected Sub-watersheds	6	5	30	5	30	5	30	4	24	4	24	6	36	5	30
Hydrology	Subaccount	Merit Score		36		36	3	6		16		36	(50		36
	Subaccount M	Aerit Rating		3.0		3.0	3	.0	3	.0	3	.0	5	i.0	3	3.0
	Loss of Fish Habitat (waterbody)	6	6	36	6	36	6	36	6	36	6	36	5	30	6	36
	Loss of Fish Habitat (watercourse)	6	5	30	5	30	4	24	6	36	6	36	1	6	6	36
Aquatic Resources	Number of new crossings	3	6	18	6	18	6	18	6	18	6	18	4	12	6	18
	Subaccount	Merit Score		84		84	7	8	9	90	9	90	4	48		90
	Subaccount M	Arit Rating		5.6		5.6	5	.2	6	.0	6	.0	3	3.2	(6.0
	Loss of Wetland	5	1	5	1	5	1	5	4	20	6	30	2	10	4	20
	Use of Disturbed Habitat	6	1	6	1	6	2	12	1	6	1	6	1	6	5	30
Terrestrial Resources	Footprint	3	1	3	1	3	3	9	3	9	4	12	1	3	4	12
Terresular Resources	Loss of Forest	5	1	5	1	5	3	15	3	15	4	20	1	5	4	20
	Subaccount	Merit Score		19		19	4	1		50	6	58	Ĩ	24		82
	Subaccount M	Aerit Rating		1.0		1.0	2	.2	2	.6	3	.6	1	.3	4	4.3
	Loss of Mainland Moose Habitat	4	1	4	1	4	1	4	4	16	6	24	2	8	5	20
	Loss of Brook Trout Habitat	6	5	30	5	30	4	24	6	36	6	36	1	6	6	36
Sensitive Species																
	Subaccount	Merit Score		34		34	2	8	5	52	e	50		14		56
	Subaccount N	Aerit Rating		3.4		3.4	2	.8	5	.2	6	.0	1	.4		5.6
		_			-								-	-		
	Fugitive Dust	6	5	30	5	30	2	12	6	36	3	18	4	24	6	36
	GHG Emissions	5	5	25	5	25	1	5	4	20	2	10	4	20	4	20
Atmospheric Emissions	Noise Emissions	3	1	3	1	3	2	6	1	3	1	3	6	18	2	6
	Subaccount	Merit Score		58		58		3		59		31		52		62
	Subaccount N	lerit Rating		4.1		1.1	1	.6	4	.2	2	.2	4	1.4		4.4
		_				r									r	
	Proximity to Protected Areas	1	1	1	1	1	1	1	1	1	2	2	3	3	1	1
Protected Areas	Subaccount			1	_	1		1		1		2		3		1
	Subaccount N	Aerit Rating		1.0		1.0	1	.0	1	.0	2	.0	3	8.0		1.0
			-							-	-				-	r
	Magnitude of Failure	2	2	4	2	4	5	10	1	2	5	10	2	4	2	4
Hazard Potential to the	Downstream Sensitivities	6	4	24	4	24	6	36	2	12	5	30	2	12	4	24
Environment	Subaccount			28		28		6		4		40		16		28
	Subaccount N	Aprit Rating		3.5	1 3	3.5	1 5	.8	1 1	.8	5	.0	1 2	2.0	1 3	3.5

Subaccount	Weight	Rating	Score												
Water Quality	6	3.5	21.0	3.5	21.0	3.5	21.0	5.0	30.0	3.0	18.0	2.5	15.0	3.5	21.0
Hydrology	6	3.0	18.0	3.0	18.0	3.0	18.0	3.0	18.0	3.0	18.0	5.0	30.0	3.0	18.0
Aquatic Resources	6	5.6	33.6	5.6	33.6	5.2	31.2	6.0	36.0	6.0	36.0	3.2	19.2	6.0	36.0
Terrestrial Resources	2	1.0	2.0	1.0	2.0	2.2	4.3	2.6	5.3	3.6	7.2	1.3	2.5	4.3	8.6
Sensitive Species	3	3.4	10.2	3.4	10.2	2.8	8.4	5.2	15.6	6.0	18.0	1.4	4.2	5.6	16.8
Atmospheric Emissions	4	4.1	16.6	4.1	16.6	1.6	6.6	4.2	16.9	2.2	8.9	4.4	17.7	4.4	17.7
Protected Areas	1	1.0	1.0	1.0	1.0	1.0	1.0	1.0	1.0	2.0	2.0	3.0	3.0	1.0	1.0
Hazard Potential to the Environment	6	3.5	21.0	3.5	21.0	5.8	34.5	1.8	10.5	5.0	30.0	2.0	12.0	3.5	21.0
Account	Merit Score	12	3.4	12	3.4	12	5.0	13	3.2	13	8.0	10	3.6	14	0.1
Account M	erit Rating	4	.9	4	.9	5	.0	5	.3	5	.5	4	.1	5.	.6





Scenario 5: Technical Indicator Analysis

			Altern	ative A	Altern	ative B	Altern	ative C	Altern	ative D	Altern	ative E	Alterr	native F	Altern	ative G
Subaccount	Indicator	Weight	Value	Score	Value	Score	Value	Score	Value	Score	Value	Score	Value	Score	Value	Score
	Storage to Dam Volume Ratio	4	4	16	2	8	1	4	1	4	1	4	6	24	1	4
	Dam Volume	6	5	30	1	6	2	12	1	6	1	6	6	36	1	6
Design Factors	Natural Topographic Containment	2	3	6	4	8	3	6	4	8	4	8	5	10	3	6
	Subaccount Me	rit Score	ш,	52	1	22	2	22	1	.8	1	18		70		16
	Subaccount Mer	rit Rating	4	l.3	1	.8	1	.8	1	.5	1	.5	5	5.8	1	.3
-																
	Monitoring Requirements	3	2	6	2	6	1	3	1	3	2	6	6	18	1	3
	Dam Height	6	4	24	4	24	6	36	1	6	1	6	4	24	2	12
Safety Factors	Impoundment Configuration	6	4	24	5	30	1	6	2	12	1	6	6	36	1	6
-	Contaminant Management	5	5	25	5	25	2	10	6	30	2	10	5	25	4	20
	Subaccount Me			79		35		5		51		28		03		41
	Subaccount Mer	rit Rating	4	.0	4	.3	2	.8	2	.6	1	.4	5	5.2	2	2.1
	Length of Ditching	6	3	18	5	30	3	18	3	18	1	6	6	36	2	12
	Number of Pumps and Pipelines	6	2	12	5	30	2	12	4	24	4	24	1	6	5	30
Water	Impacts to Annual Water Balance	6	5	30	3	18	1	6	5	30	5	30	1	6	6	36
Management	Reclaim Water Return	6	1	6	5	30	4	24	5	30	6	36	1	6	5	30
	Subaccount Me	rit Score	6	56	1	08	6	60	10	02	9	96		54	1	08
	Subaccount Mer	rit Rating	2	2.8	4	.5	2	.5	4	.3	4	l.0	2	2.3	4	l.5
	-															
Expansion	Maximum Expansion Capacity	6	4	24	5	30	3	18	2	12	6	36	6	36	1	6
Capacity	Subaccount Me	rit Score		24		30		8		2		36		36		6
	Subaccount Mer	rit Rating	4	l.0	5	i.0	3	.0	2	.0	6	5.0	6	5.0	1	.0
Compliance with	Ease of Obtaining Initial Permits	1	4	4	6	6	2	2	5	5	2	2	4	4	4	4
Environmental	Subaccount Me	rit Score		4		6		2	-	5		2		4	<u> </u>	4
Approvals	Subaccount Mer			I.O		.0		.0		.0		2.0		I.O		I.O
	Tailings Disposal	6	5	30	6	36	2	12	6	36	3	18	4	24	6	36
	Processing Complexity	5	4	20	5	25	2	10	5	25	2	10	4	20	5	25
Complexity of	Distance from the Mill	5	1	5	6	30	6	30	6	30	6	30	1	5	6	30
Operations	Elevation from the Mill	3	6	18	1	3	1	3	1	3	1	3	5	15	1	3
operations	Climatic Challenges	4	4	16	5	20	2	8	5	20	3	12	4	16	5	20
	Subaccount Me	rit Score	8	39	1	14	e	53	1:	14	7	73	8	30	1	14
	Subaccount Mer	rit Rating	3	8.9	5	5.0	2	.7	5	.0	3	3.2	9	8.5	5	5.0
	Matarial Availability	4	2		c	24	c	24	6	24	c	24	1	4	6	24
	Material Availability	4	2	8	6	24 18	6	24 36	3	24 18	6	36	1	4	6	24 18
Constructability	Foundation Suitability	-		-	-	-	-		-	-	-		-	-	-	-
	Subaccount Me			14		42		50 0		12		50		10		12
	Subaccount Mer	nt Rating	1	.4	1 4	.2	6	.0	ı 4	.2	6	i.0	1	.0	1 4	.2

Subaccount	Weight	Rating	Score												
Design Factors	3	4.3	13.0	1.8	5.5	1.8	5.5	1.5	4.5	1.5	4.5	5.8	17.5	1.3	4.0
Safety Factors	6	4.0	23.7	4.3	25.5	2.8	16.5	2.6	15.3	1.4	8.4	5.2	30.9	2.1	12.3
Water Management	6	2.8	16.5	4.5	27.0	2.5	15.0	4.3	25.5	4.0	24.0	2.3	13.5	4.5	27.0
Expansion Capacity	2	4.0	8.0	5.0	10.0	3.0	6.0	2.0	4.0	6.0	12.0	6.0	12.0	1.0	2.0
Compliance with Environmental Approvals	5	4.0	20.0	6.0	30.0	2.0	10.0	5.0	25.0	2.0	10.0	4.0	20.0	4.0	20.0
Complexity of Operations	4	3.9	15.5	5.0	19.8	2.7	11.0	5.0	19.8	3.2	12.7	3.5	13.9	5.0	19.8
Constructability	4	1.4	5.6	4.2	16.8	6.0	24.0	4.2	16.8	6.0	24.0	1.0	4.0	4.2	16.8
Account Me	erit Score	10	2.3	13	4.6	88	3.0	11	0.9	95	.6	11	1.8	10	1.9
Account Me	rit Rating	3.	.4	4	.5	2	.9	3.	.7	3.	.2	3.	.7	3	.4

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Scenario 5: Project Economics Indicator Analysis

			Altern	ative A	Altern	ative B	Altern	ative C	Altern	ative D	Altern	ative E	Altern	ative F	Altern	ative G
Subaccount	Indicator	Weight	Value	Score												
	Initial Capital Costs	5	5	25	3	15	1	5	5	25	6	30	4	20	6	30
	Sustaining Capital Costs	4	4	16	6	24	1	4	2	8	1	4	6	24	1	4
	Operating Costs	6	6	36	3	18	1	6	6	36	4	24	6	36	6	36
Total Costs	Closure Costs	2	6	12	6	12	6	12	5	10	1	2	1	2	6	12
Total Costs	Post-Closure Costs	2	2	4	4	8	1	2	1	2	6	12	6	12	1	2
	Ancillary Costs	6	3	18	3	18	4	24	5	30	2	12	1	6	6	36
	Subaccount N	Aerit Score	1	11	9	5	5	3	1	11	8	34	1(00	12	20
	Subaccount M	erit Rating	4	.4	3	.8	2	.1	4	.4	3	.4	4	.0	4	.8
	Projected Timeline for Permits	6	1	6	4	24	1	6	4	24	5	30	1	6	1	6
Economic Risks	Projected Timeline for Start of Operations	5	4	20	6	30	2	10	5	25	1	5	4	20	4	20
ECONOMIC RISKS	Subaccount Merit Score		2	26	5	4	1	6	4	9	3	35	2	6	2	26
	Subaccount M	erit Rating	2	.4	4	.9	1	.5	4	.5	3	.2	2	.4	2	.4

Subaccount	Weight	Rating	Score												
Total Costs	6	4.4	26.6	3.8	22.8	2.1	12.7	4.4	26.6	3.4	20.2	4.0	24.0	4.8	28.8
Economic Risks	4	2.4	9.5	4.9	19.6	1.5	5.8	4.5	17.8	3.2	12.7	2.4	9.5	2.4	9.5
Account	/lerit Score	36	5.1	42	.4	18	.5	44	.5	32	9	33	.5	38	.3
Account M	erit Rating	3.	.6	4.	.2	1.	9	4.	4	3.	3	3.	3	3.	8



Scenario 5: Socioeconomics Indicator Analysis

			Altern	ative A	Altern	ative B	Altern	ative C	Altern	ative D	Altern	ative E	Altern	ative F	Altern	ative G
ubaccount	Indicator	Weight	Value	Score												
	Loss of Recreational Fishing	6	1	6	4	24	4	24	4	24	5	30	1	6	6	36
	Loss of Commercial Forest Harvesting	4	6	24	4	16	6	24	4	16	4	16	1	4	4	16
Non-Indigenous Land Use	Loss of ATV Trails	2	6	12	2	4	2	4	1	2	4	8	1	2	3	6
Non-indigenous Land Ose	Loss of Private Land Ownership	2	2	4	6	12	6	12	6	12	6	12	1	2	6	12
	Subaccount	Merit Score	4	46	5	6	6	54		54	(56	1	4	7	70
	Subaccount M	erit Rating	3	.3	4	.0	4	.6	3	.9	4	1.7	1	.0	5	5.0
	·															
	Fugitive Dust	5	5	25	5	25	2	10	6	30	3	15	4	20	6	30
Human Health and Public	Hazard Potential to the Public	6	1	6	4	24	6	36	2	12	5	30	2	12	4	24
Safety	Risk to Workers	6	6	36	6	36	4	24	5	30	1	6	6	36	5	30
Salety	Subaccount I	Merit Score	e	57	8	35		70	7	72		51	6	58	8	34
	Subaccount M	erit Rating	3	.9	5	.0	4	l.1	4	.2	3	3.0	4	.0	4	1.9
	•															
	Change in Aesthetics / Visual Impacts	4	4	16	4	16	6	24	1	4	1	4	4	16	2	8
On continued losses at	Noise Emissions	3	6	18	1	3	2	6	1	3	1	3	6	18	2	6
Operational Impact	Subaccount I	Merit Score		34	1	9		30		7		7	3	34	1	14
	Subaccount M	erit Rating	4	.9	2	7	4	l.3	1	.0	1	.0	4	.9	2	2.0
	•															
	Loss of Local Jobs and Business Opportunities	1	4	4	4	4	1	1	3	3	1	1	5	5	3	3
Local Economic Risk	Subaccount I	Merit Score		4		4		1		3		1		5		3
	Subaccount M	erit Rating	4	.0	4	.0	1	.0	3	.0	1	.0	5	.0	3	3.0

Subaccount	Weight	Rating	Score												
Non-Indigenous Land Use	3	3.3	10	4.0	12	4.6	14	3.9	12	4.7	14	1.0	3	5.0	15
Human Health and Public Safety	5	3.9	20	5.0	25	4.1	21	4.2	21	3.0	15	4.0	20	4.9	25
Operational Impact	3	4.9	15	2.7	8	4.3	13	1.0	3	1.0	3	4.9	15	2.0	6
Local Economic Risk	2	4.0	8	4.0	8	1.0	2	3.0	6	1.0	2	5.0	10	3.0	6
Account I	Merit Score	5	2	5	3	4	9	4	2	3	4	4	8	5	2
Account M	erit Rating	4	.0	4	.1	3	.8	3	.2	2	.6	3.	.7	4	.0



Scenario 5: Environmental Account Analysis

		Alternative A		Alternative B		Alternative C		Alternative D		Alternative E		Alternative F		Alternative G		
Subaccount	Weight	Rating	Score													
Water Quality	6	3.5	21.0	3.5	21.0	3.5	21.0	5.0	30.0	3.0	18.0	2.5	15.0	3.5	21.0	
Hydrology	6	3.0	18.0	3.0	18.0	3.0	18.0	3.0	18.0	3.0	18.0	5.0	30.0	3.0	18.0	
Aquatic Resources	6	5.6	33.6	5.6	33.6	5.2	31.2	6.0	36.0	6.0	36.0	3.2	19.2	6.0	36.0	
Terrestrial Resources	2	1.0	2.0	1.0	2.0	2.2	4.3	2.6	5.3	3.6	7.2	1.3	2.5	4.3	8.6	
Sensitive Species	3	3.4	10.2	3.4	10.2	2.8	8.4	5.2	15.6	6.0	18.0	1.4	4.2	5.6	16.8	
Atmospheric Emissions	4	4.1	16.6	4.1	16.6	1.6	6.6	4.2	16.9	2.2	8.9	4.4	17.7	4.4	17.7	
Protected Areas	1	1.0	1.0	1.0	1.0	1.0	1.0	1.0	1.0	2.0	2.0	3.0	3.0	1.0	1.0	
Hazard Potential to the Environment	6	3.5	21.0	3.5	21.0	5.8	34.5	1.8	10.5	5.0	30.0	2.0	12.0	3.5	21.0	
Account Merit Score		12	123.4		123.4		125.0		133.2		138.0		103.6		10.1	
Account Merit Rating		4	4.9		4.9		5.0		5.3		5.5		4.1		5.6	

Scenario 5: Technical Account Analysis

		Alternative A		Alternative B		Alternative C		Alternative D		Alternative E		Alternative F		Alternative G	
Subaccount	Weight	Rating	Score												
Design Factors	3	4.3	13.0	1.8	5.5	1.8	5.5	1.5	4.5	1.5	4.5	5.8	17.5	1.3	4.0
Safety Factors	6	4.0	23.7	4.3	25.5	2.8	16.5	2.6	15.3	1.4	8.4	5.2	30.9	2.1	12.3
Water Management	6	2.8	16.5	4.5	27.0	2.5	15.0	4.3	25.5	4.0	24.0	2.3	13.5	4.5	27.0
Expansion Capacity	2	4.0	8.0	5.0	10.0	3.0	6.0	2.0	4.0	6.0	12.0	6.0	12.0	1.0	2.0
Compliance with Environmental Approvals	5	4.0	20.0	6.0	30.0	2.0	10.0	5.0	25.0	2.0	10.0	4.0	20.0	4.0	20.0
Complexity of Operations	4	3.9	15.5	5.0	19.8	2.7	11.0	5.0	19.8	3.2	12.7	3.5	13.9	5.0	19.8
Constructability	4	1.4	5.6	4.2	16.8	6.0	24.0	4.2	16.8	6.0	24.0	1.0	4.0	4.2	16.8
Account Merit Score		102.3		134.6		88.0		110.9		95.6		111.8		101.9	
Account Merit Rating		3.4		4.5		2.9		3.7		3.2		3.7		3.4	



Scenario 5: Project Economics Account Analysis

		Altern	Alternative A		Alternative B		Alternative C		Alternative D		Alternative E		Alternative F		ative G	
Subaccount	Weight	Rating	Score	Rating	Score											
Total Costs	6	4.4	26.6	3.8	22.8	2.1	12.7	4.4	26.6	3.4	20.2	4.0	24.0	4.8	28.8	
Economic Risks	4	2.4	9.5	4.9	19.6	1.5	5.8	4.5	17.8	3.2	12.7	2.4	9.5	2.4	9.5	
Acco	Account Merit Scor		36.1		42.4		18.5		44.5		32.9		33.5		38.3	
Account Merit Rating		3	3.6		4.2		1.9 4.		4.4		3.3		3.3		.8	

Scenario 5: Socioeconomics Account Analysis

			Alternative A		Alternative B		Alternative C		Alternative D		Alternative E		Alternative F		ative G
Subaccount	Weight	Rating	Score	Rating	Score										
Non-Indigenous Land Use	3	3.3	10	4.0	12	4.6	14	3.9	12	4.7	14	1.0	3	5.0	15
Human Health and Public Safety	5	3.9	20	5.0	25	4.1	21	4.2	21	3.0	15	4.0	20	4.9	25
Operational Impact	3	4.9	15	2.7	8	4.3	13	1.0	3	1.0	3	4.9	15	2.0	6
Local Economic Risk	2	4.0	8	4.0	8	1.0	2	3.0	6	1.0	2	5.0	10	3.0	6
Acc	Account Merit Score		52		53		49		42		34		48		52
Acco	Account Merit Rating		4.0		4.1		3.8		3.2		2.6		3.7		.0

Scenario 5: Prioritize Water Weights Summary

		Alterna	ative A	Altern	Alternative B		Alternative C		Alternative D		Alternative E		Alternative F		ative G
Account	Weight	Rating	Score	Rating	Score	Rating	Score	Rating	Score	Rating	Score	Rating	Score	Rating	Score
Environment	6	4.9	29	4.9	29	5.0	30	5.3	32	5.5	33	4.1	25	5.6	33
Technical	3	3.4	10	4.5	13	2.9	9	3.7	11	3.2	10	3.7	11	3.4	10
Economics	1.5	3.6	5	4.2	6	1.9	3	4.4	7	3.3	5	3.3	5	3.8	6
Socioeconomics	3	4.0	12	4.1	12	3.8	11	3.2	10	2.6	8	3.7	11	4.0	12
Alternative Merit Score 57		7	62		53		59		55		52		61		
Alternative Merit Rating		4.	.2	4.6		3.9		4.4		4.1		3.8		4.5	

