



Red Chris Development Company Ltd.
200-580 Hornby Street, Vancouver, BC V6C 3B6

March 17, 2015

Mr. Al Hoffman
Chief Inspector of Mines
Executive Director, Health, Safety and Permitting
PO Box 9320mStn Prov Govt
Victoria, B.C. V8W 9N3

RE: Hours of Employment Variance Request – Red Chris Development Company Ltd.

Dear Mr. Hoffman

Red Chris Development Company Ltd. (RCDC) respectfully requests the permission for a variance pertaining to hours of employment under Part 1, Section 1.5.1 of the Health, Safety and Reclamation Code for Mines in British Columbia.

The Red Chris project is preparing to initiate the 2015 Tailings Impoundment Area (TIA) construction program through a contract with Tahltan/Ledcor limited partnership. The schedule is expected to begin in April 2015 and continue for a period of approximately four months.

Tahltan/Ledcor is proposing to work a fourteen (14) days on, seven (7) days off schedule, eleven (11) hours paid per day for the period of construction. The proposed schedule will apply to approximately seventy (70) Tahltan/Ledcor contract employees.

Please accept this letter as a variance request application for the Tahltan/Ledcor employees work schedule. If you require additional information, please do not hesitate to contact me.

Sincerely,

Tim Fisch
General Manager
Red Chris Development Company Ltd.
Office – 604-800-9200 ext 349
Cell – 250-267-1856

Ec: Mr. Doug Flynn, Senior Inspector of Mines Health and Safety, Smithers, MEM
Mr. Scott Parker, Inspector of Mines, Health and Safety, Smithers, MEM
Mr. Don Parsons, Chief Operating Officer, Imperial Metals Corporation.
Mr. Randy Daggitt, Vice President, Tahltan Ledcor Limited Partnership.



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Mariah Grace
RCDC – OHSC Co Chair


Tahltan Ledcor Limited Partnership
OHSC – Co-Chair

Kevin Pessert


OPERATIONS MANAGER
LEDOR CMI LTD.
OFFICE 604 699 2922
CELL s.22



Red Chris

an Imperial Metals company

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Mariah Grace
RCDC – OHSC Co Chair

Tahltan Ledcor Limited Partnership
OHSC – Co-Chair

Kevin Pessier



June 9, 2015

Mr. Tim Fisch
General Manager
Red Chris Development Company Ltd.
200-580 Hornby Street
Vancouver BC V6C 3B6

Mine: 0101102
ORCS: 14500-02

By mail & email: tfisch@imperialmetals.com

Dear Mr. Fisch:

Re: Application for Variance to the Health, Safety and Reclamation Code section 1.5.1

Your request for a variance to the Health, Safety and Reclamation Code for Mines in BC (Code) pertaining to hours of employment under Part 1, Section 1.5.1 has been reviewed.

Tahltan/Iedcor is proposing a schedule of 14 days at 11.5 hours per day, followed by 7 days off, for a period of four months. Originally intended to commence in April, it will average less than 54 hours per week over approximately four months for an estimated 70 contract employees.

A Fatigue Management Plan, (FMP) has also been submitted for review. The program appropriately places responsibilities for fatigue management on all those involved in addition to the project management: for those doing the work (workers), supervising the work (foremen) and some recognition towards the importance toward the design of the work (management and supervisors) in 6.0-Prevention. Education on signs and symptoms, implications of and preventative measures are included.

Please ensure all training of the FMP is documented including training dates and names of persons trained. All audits of the effectiveness of the program and the results should also be documented.

I note that all workers on this site, Red Chris and contract employees, are housed in a camp located on site and are not permitted to commute home on a daily basis. In addition to provided air and bus transportation at the beginning of their rotation, you indicate a small percentage of workers may elect to drive to and from site, approximately 6 hours. As an accumulated sleep debt leading to fatigue impairment may be present at the end of several consecutive shifts, in particular night shifts, this particular group of workers may be at a higher risk of a commuting-related incident and should be monitored closely.

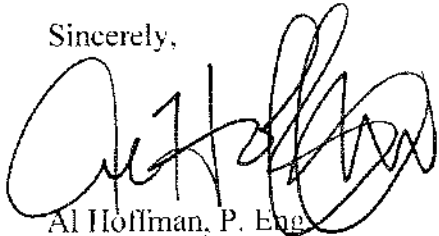
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This proposed schedule is acceptable for the period until August 31, 2015 under the following condition:

It shall also be included in the FMP that workers are allowed to report to first-aid if they are suffering from fatigue and present a hazard to themselves or others. They would then be accommodated with some down-time to recover without lost wages or perception of coercion. Please confirm this has been included in the plan and communicated to the workforce.

This variance is in effect until August 31, 2015.

Sincerely,

A handwritten signature in black ink, appearing to read 'Al Hoffman', written over a horizontal line.

Al Hoffman, P. Eng.
Chief Inspector of Mines

Ec: Mr. Rolly Thorpe, Deputy Chief Inspector of Mines, Health and Safety, EMNG
Ms. Cheryl Pocklington, Inspector of Mines Ergonomics, Victoria, MEM
Mr. Doug Flynn, Senior Inspector of Mines Health and Safety, Smithers, MEM
Mr. Scott Parker, Inspector of Mines, Health and Safety, Smithers, MEM