

Morello, Elisabeth EMPR:EX

From: Paul Teniere s.22
Sent: March 4, 2020 5:55 PM
To: Brash, Jennifer EMPR:EX
Cc: Henning, Hermanus EMPR:EX; Narynski, Heather M EMPR:EX; Jewsbury, Jerrold EMPR:EX; James, Tracy A EMPR:EX; Craig, Andrew EMPR:EX; Michael Raven (mraven@beadleraven.com)
Subject: Re: Cameo Industries Corp - MAX Moly Mine - Geotechnical Inspection

Hi Jennifer,

I apologize for the delay in getting back to you. I am hoping to provide a more fulsome response in due course after getting some additional information from our consultants.

Thanks for your patience.

Paul

On Tue, Feb 11, 2020 at 8:07 PM Brash, Jennifer EMPR:EX <Jennifer.Brash@gov.bc.ca> wrote:

Paul,

Thanks for the update. I have a few questions/comments on the information provided:

- Regarding Order 1 (2019): Cameo requests conversation with EMPR to "identify if there are acceptable ways to streamline these two documents" (i.e. the EPRP and MERP).
 - Feel free to give me a call, or have your consultant give me a call, to discuss.
- Advisory 2: Cameo response describes that annual testing of the MERP will occur after the updates to the MERP/EPRP are completed.
 - Note that the advisory requested the date of the last test of the MERP, which is an annual requirement under Part 3.7.1 of the Code. Please provide this date.
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 - It is unclear if the monitoring program is in place. Please clarify and describe the monitoring program.
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 - Please advise the expected date of permitting submittal and planned construction timeframe for the spillway.
- Order 8 (2018): Cameo response refers back to the Order responses.
 - Please refer back to the Order. The information provided does not address the Order.

Please note that the current status of Orders remains the same as previously communicated (Dec 5, 2019).

Regards,

Jennifer

Jennifer Brash, M.Eng., P.Eng.

Senior Geotechnical Inspector

Ministry of Energy, Mines and Petroleum Resources

1810 Blanshard St., Victoria, BC V8T 4J1

W: 778-698-5454

s.22

From: Paul Teniere s.22

Sent: January 22, 2020 7:50 AM

To: Brash, Jennifer EMPR:EX <Jennifer.Brash@gov.bc.ca>

Cc: Henning, Hermanus EMPR:EX <Hermanus.Henning@gov.bc.ca>; Narynski, Heather M EMPR:EX <Heather.Narynski@gov.bc.ca>; Jewsbury, Jerrold EMPR:EX <Jerrold.Jewsbury@gov.bc.ca>; James, Tracy A EMPR:EX <Tracy.James@gov.bc.ca>; Craig, Andrew EMPR:EX <Andrew.Craig@gov.bc.ca>; Michael Raven (mraven@beadleraven.com) <mraven@beadleraven.com>

Subject: Re: Cameo Industries Corp - MAX Moly Mine - Geotechnical Inspection

Hi Jennifer,

I apologize for the delay in responding to your action items shown below. Despite the Christmas holidays causing some delays, I did manage to work with our consultants over the past few weeks to get a couple of proposals together to deal with the outstanding items addressed in your email. The attached letter responds to each action item from your December 5th email and updates you on our progress. Please do not hesitate to contact me if you have any further questions and I will continue to update you on our progress and send you the required documentation once it has been delivered to us from our consultants.

Thanks,

Paul

Paul Teniere, M.Sc., P.Geo.

CEO and Director

Cameo Industries Corp

s.22

On Thu, Dec 5, 2019 at 7:39 PM Brash, Jennifer EMPR:EX <Jennifer.Brash@gov.bc.ca> wrote:

Mr. Teniere,

Please find below a summary of the current status of action items from the 2019 Geotechnical Inspection at the Max Moly Mine. Note that I've only included advisories and information requests where there is an outstanding action.

- Order 1 (Section 35): **Open, overdue.** Requested information not provided.
- Order 2 (Section 35): Ongoing.
- Order 3 (Section 35): Ongoing. Photos submitted do not show the area discussed in the order – **please provide a new response.**
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- Information Request 1: Information requested was not provided – **please provide.**
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- Information Request 4: Information requested was not provided – **please provide.**

Please also note that the 2019 inspection report includes references to outstanding 2018 Geotechnical Inspection Report Orders, all of which have been subsequently re-issued as Section 35 Orders. Of the 9 2018 Geotechnical Inspection Report Orders, 4 were repeated in the 2018 inspection (listed above), one is closed (Order 3), and **4 remain open and overdue (Orders 5, 7, 8, 9).**

Open and overdue orders represent non-compliances with the Mines Act. Continued non-compliance may result in escalated enforcement action.

Finally, **please provide an update on hiring a Mine Manager.**

Regards,

Jennifer

Jennifer Brash, M.Eng., P.Eng.

Senior Geotechnical Inspector

Ministry of Energy, Mines and Petroleum Resources

1810 Blanshard St., Victoria, BC V8T 4J1

W: 778-698-5454

s.22

From: Paul Teniere s.22

Sent: Thursday, October 3, 2019 9:15 AM

To: Brash, Jennifer EMPR:EX

Cc: Lucas Birdsall; Michael Raven

Subject: Re: Cameo Industries Corp - MAX Moly Mine - Geotechnical Inspection

Hello Jennifer,

As promised, attached is our response to your June 25, 2019 geotechnical inspection report. A copy of the 2019 DSI report by BGC Engineering and pictures of the work completed to seal the mine portals and block access to the site is found in the following Dropbox link due to the large size of files: s.22

s.22

Please confirm receipt of this email and attachment, and if you were able to download the files off Dropbox. Let me know if you have any other questions or concerns.

Thanks,

Paul

cc: Michael Raven, Lucas Birdsall

Paul Teniere, M.Sc., P.Geo.

CEO and Director

Cameo Industries Corp

s.22

On Fri, Sep 27, 2019 at 5:15 PM Paul Teniere s.22

wrote:

Hi Jennifer,

As a follow up to my last email on Monday, I just wanted to let you know that we just received a final copy of the DSI report for MAX Mine from BGC Engineering and a proposal for the TSF upgrades. They are also in the final stages of providing us with a cost proposal for updating other urgent documentation such as the OMS, EPRP and other required manuals/documentation noted in your inspection. In addition, we have received photos from our Caretaker of the finished portal repairs and blocked access to the site. We are still looking into hiring a Mine Supervisor (Mine Manager) and BGC have provided the contact information of some individuals for consideration. We may need to expand our scope using a recruiter as well.

I plan on providing you with a more fullsome response to your letter next week once we receive the new proposal from BGC, but wanted to let you know right away that the DSI report was complete. Our response will include this report and other documentation/photos.

Thanks,

Paul

On Mon, Sep 23, 2019 at 10:07 AM Paul Teniere [s.22](#) wrote:

Hi Jennifer,

My sincere apologies for the delay in responding to your geotechnical inspection report. We are still in the process of completing the DSI report and while a draft is complete, BGC Engineering still waiting on information from our environmental consultants for the Hydrology section and other details. Several consultants were away at the end of August to early September and are still trying to get caught up with completing this work. We have expressed the urgency of these reports to our consultants and hope to have the DSI report and other documents to you soon.

Since my last email, we have properly repaired and sealed the mine portals (completed last week by our Caretaker and contractors) and also restricted access to the site as requested in your inspection and as required under the Mines Act. I have asked the Caretaker to take pictures of the completed work to ensure it meets the requirements. There will be no access to the underground workings while the mine is on care and maintenance and not until a mining engineer has inspected the portals for re-entry. There are no plans at this time to re-enter the mine.

I hope to have a better response to your report shortly, once I get another update from BGC Engineering who is helping us with updating the documentation including the OMS and EPRP manuals, TSF and DSI reports, etc.

Thanks,

Paul

Paul Teniere, M.Sc., P.Geo.

CEO and Director

Cameo Industries Corp

s.22

On Fri, Sep 20, 2019 at 7:29 PM Brash, Jennifer EMPR:EX <Jennifer.Brash@gov.bc.ca> wrote:

Hello,

I have not received further correspondence regarding this inspection report. Below you state you will provide a comprehensive response by the end of August. Please provide this information immediately.

Regards,

Jennifer

Jennifer Brash, M.Eng., P.Eng.

Senior Geotechnical Inspector

Ministry of Energy, Mines and Petroleum Resources

1810 Blanshard St., Victoria, BC V8T 4J1

W: 778-698-5454

s.22

From: Paul Teniere s.22

Sent: Thursday, August 15, 2019 7:20 PM

To: Brash, Jennifer EMPR:EX

Cc: Michael Raven; Lucas Birdsall

Subject: Cameo Industries Corp - MAX Moly Mine - Geotechnical Inspection

Hello Jennifer,

I am writing to inform you that Cameo Industries Corp (Cameo or the Company) is almost in a position to provide a comprehensive response to the outstanding geotechnical inspection report for its MAX Moly Mine, which we anticipate filing by the end of August. In the interim, the Company is providing the following reports and advises as follows:

1. An Environmental Effects Monitoring (EEM) report is attached.
2. A Hydrology Report is attached.
3. Due to the MAX property being under care and maintenance with very limited to no activity on site, the Company is retaining a previous Caretaker of the property to ensure continuous site monitoring, complete water sampling, and to supervise the securing of the mine portals against entry/access.
4. A Dam Safety Inspection (DSI) has been completed by BGC Engineering. However, BGC is still in the process of completing the final report, and the Company is anticipating receiving this report within the next two weeks. We will forward this report on to you along with our comprehensive response.
5. The Company's legal counsel (Michael Raven) has been in contact with Jerrold Jewsbury (Inspector of Mines) and kept him informed of the Company's progress.

We will provide further information as it becomes available.

Thank you,

Paul

cc: Michael Raven, Lucas Birdsall

Paul Teniere, M.Sc., P.Geo.

CEO and Director

Cameo Industries Corp

s.22

From: [Paul Teniere](#)
To: [Brash, Jennifer EMPR:EX](#)
Cc: [Narynski, Heather M EMPR:EX](#); [Jewsbury, Jerrold EMPR:EX](#); [Craig, Andrew EMPR:EX](#)
Subject: May 29/2020 photos from MAX Mine site
Date: June 1, 2020 3:08:15 PM
Attachments: [IMG_2245.jpg](#)
[IMG_2244.jpg](#)
[IMG_2243.jpg](#)
[IMG_2241.jpg](#)
[IMG_2239.jpg](#)

Hi Jennifer,

As a follow up to my earlier email, please find attached some photos taken at the MAX site late last week (May 29) prior to the rain event. [s.22](#) will be on site again today to take further pictures and check on the mine site and ponds after this last storm and during the current weather advisories. They are at the mine a minimum of twice a week when spring arrives, and they assure me the pond is not a concern at all and will be checking the pipe and streams today.

Thanks,

Paul

----- Forwarded message -----

From: [s.22](#)
Date: Mon, Jun 1, 2020 at 9:35 AM
Subject: May 29/20
To: Ico de Zwart <ico@masseenvironmental.com>, Ico de Zwart <ico@masse-env.com>, Paul Teniere [s.22](#)

Sent from my iPhone

From: [Paul Teniere](#)
To: [Brash, Jennifer EMPR:EX](#)
Cc: [Narynski, Heather M EMPR:EX](#); [Jewsbury, Jerrold EMPR:EX](#); [Craig, Andrew EMPR:EX](#)
Subject: Re: Max Moly Status Update
Date: June 1, 2020 10:33:46 AM

Hi Jennifer,

Thanks for the call earlier today. I just spoke with our site personnel and they will be taking additional pictures of the MAX mine site and tailings facility to confirm no damage from this past rain event. They do not anticipate any issues with the tailings pond due to recent siphoning and repairs to water lines after the winter season. Water levels remained under control due to these efforts during the spring thaw hopefully lessening the impact of a large rain event as occurred this past weekend. I will forward you the pictures as soon as I receive them.

I also hope to provide you with a more fulsome response to your last email earlier this year very soon. We are in the midst of completing a significant financing and other corporate actions which will improve our financial situation and allow us to continue work on mine documentation and work on the final design for the tailings spillway. We did complete some work on the documentation over the winter and will provide you with an update in the next couple of weeks.

I'll be in touch regarding site conditions and pictures of the MAX mine site.

Thanks,

Paul

Paul Teniere, M.Sc., P.Geo.
CEO and Director
Cameo Industries Corp

s.22

On Mon, Jun 1, 2020 at 12:44 PM Brash, Jennifer EMPR:EX <Jennifer.Brash@gov.bc.ca> wrote:

Mr. Teniere,

This email is a follow up to our telephone conversation this morning. Please provide to EMPR an update on the status of the Max Moly site and TSF. Specifically, please provide an update on how the site and TSF have passed the recent weekend flooding event.

Thank you,

Jennifer Brash, M.Eng., P.Eng.

Manager, Geotechnical Engineering / Inspector of Mines

Ministry of Energy, Mines and Petroleum Resources – Major Mines Office

1810 Blanshard St., Victoria, BC V8T 4J1

W: 778-698-5454

s.22

From: Paul Teniere
To: Brash, Jennifer EMPR:EX
Cc: Henning, Hermanus EMPR:EX; Narynski, Heather M. EMPR:EX; Jewsbury, Jerrold EMPR:EX; James, Tracy A. EMPR:EX; Craig, Andrew EMPR:EX; Michael Raven (mraven@beadleraven.com)
Subject: Re: Cameo Industries Corp - MAX Moly Mine - Geotechnical Inspection
Date: October 26, 2020 1:38:12 PM
Attachments: image001.png

[EXTERNAL] This email came from an external source. Only open attachments or links that you are expecting from a known sender.

Hi Jennifer,

Please refer to our answers to your comments/questions below in blue. Hopefully this addresses your questions.

Thanks,

Paul

On Thu, Oct 22, 2020 at 3:24 PM Brash, Jennifer EMPR:EX <Jennifer.Brash@gov.bc.ca> wrote:

Mr. Teniere,

Can you please provide the information referred to below?

Thanks,

Jennifer



Jennifer Brash, M.Eng., P.Eng.

Manager, Geotechnical Engineering, Major Mines Office

Ministry of Energy, Mines and Petroleum Resources

Phone: 778-698-5454

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Paul,

Thanks for the update. I have a few questions/comments on the information provided:

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 - Feel free to give me a call, or have your consultant give me a call, to discuss. [Cameo: The Company suggests tabling that conversation after BGC have completed the document production. Thank you for the offer to discuss and BGC will contact you in due course].
- Advisory 2: Cameo response describes that annual testing of the MERP will occur after the updates to the MERP/EPRP are completed.
 - Note that the advisory requested the date of the last test of the MERP, which is an annual requirement under Part 3.7.1 of the Code. Please provide this date. [Cameo: The Company and its consultants are not aware of any tests that have been performed within the past year while we work on updating the MERP].
- Advisory 6/Order 5 (2018): Cameo responds to Advisory 6 by describing repairs at sediment pond outlet structures and siphoning to reduce water levels. In the response to Order 5 (2018), Cameo refers to again to the siphoning/water level reduction.
 - It is unclear from the information provided which activities were conducted at which structures (e.g. sediment ponds, TSF, seepage ponds). Please clarify which structures are referred to in the Advisory 6/Order 5 responses. [Cameo: Our site caretakers s.22 replaced a section of one of the siphon lines that was broken/cracked. This was completed on May 24, 2020 and was a minor repair. Siphoning of the ponds was completed twice; in the fall of 2019 prior to the winter season, and in the spring of 2020 during the spring thaw. No issues were noted on site and all siphon lines are in proper working order]
- Order 5 (2018): Cameo response describes a weekly to monthly monitoring program.
 - It is unclear if the monitoring program is in place. Please clarify and describe the monitoring program. [Cameo: Our site caretakers s.22 visit the site regularly and at a minimum every two weeks or even less as required, especially during the spring thaw and summer season to check on the mine and mill structures and tailings ponds. They do field measurements (pH, conductivity, turbidity, water level) at the discharge points (weirs), as well as providing observations on the status of the tailings pond. The laboratory analysis of water samples is 4 times per year (quarterly), and groundwater is sampled 2 times per year. They send us the data in a field sheet every month and coordinate with Masse Environmental (lco) on the quarterly water sample collection. In addition, if they report any repairs are required to the buildings, portal entrance, or barriers on site this is reported to Cameo and addressed immediately. s.22

Order 5 (2018): Cameo response notes that a spillway design is intended to be submitted to EMPR for permitting review.

- Please advise the expected date of permitting submittal and planned construction timeframe for the spillway. [Cameo: [The design proposal is currently on hold pending completion of documentation work](#)]
- Order 8 (2018): Cameo response refers back to the Order responses.
 - Please refer back to the Order. The information provided does not address the Order. [Cameo: based on the Company's interpretation of this Order under the 2018 inspection completed while the project was held by MX Gold, we believe it refers to the completion of a Dam Safety Inspection and providing the results to EMPR, which was done by Cameo in 2019 and already submitted to the EMPR several months ago. However, please clarify if that is not the case]

Please note that the current status of Orders remains the same as previously communicated (Dec 5, 2019). [Cameo: Noted]

Regards,

Jennifer

Jennifer Brash, M.Eng., P.Eng.

Senior Geotechnical Inspector

Ministry of Energy, Mines and Petroleum Resources

1810 Blanshard St., Victoria, BC V8T 4J1

W: 778-698-5454

s.22

From: Paul Teniere [s.22](#)

Sent: January 22, 2020 7:50 AM

To: Brash, Jennifer EMPR:EX <Jennifer.Brash@gov.bc.ca>

Cc: Henning, Hermanus EMPR:EX <Hermanus.Henning@gov.bc.ca>; Narynski, Heather M EMPR:EX <Heather.Narynski@gov.bc.ca>; Jewsbury, Jerrold EMPR:EX <Jerrold.Jewsbury@gov.bc.ca>; James, Tracy A EMPR:EX <Tracy.James@gov.bc.ca>; Craig, Andrew EMPR:EX <Andrew.Craig@gov.bc.ca>; Michael Raven (mraven@beadleraven.com) <mraven@beadleraven.com>

Subject: Re: Cameo Industries Corp - MAX Moly Mine - Geotechnical Inspection

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Paul Teniere, M.Sc., P.Geo.

CEO and Director

Cameo Industries Corp

s.22

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Finally, **please provide an update on hiring a Mine Manager.**

Regards,

Jennifer

Jennifer Brash, M.Eng., P.Eng.

Senior Geotechnical Inspector

Ministry of Energy, Mines and Petroleum Resources

1810 Blanshard St., Victoria, BC V8T 4J1

W: 778-698-5454

s.22

From: Paul Teniere **s.22**
Sent: Thursday, October 3, 2019 9:15 AM
To: Brash, Jennifer EMPR:EX
Cc: Lucas Birdsall; Michael Raven
Subject: Re: Cameo Industries Corp - MAX Moly Mine - Geotechnical Inspection

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s.22

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CEO and Director

Cameo Industries Corp

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Paul

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I hope to have a better response to your report shortly, once I get another update from BGC Engineering who is helping us with updating the documentation including the OMS and EPRP manuals, TSF and DSI reports, etc.

Thanks,

Paul

Paul Teniere, M.Sc., P.Geo.

CEO and Director

Cameo Industries Corp

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Regards,

Jennifer

Jennifer Brash, M.Eng., P.Eng.

Senior Geotechnical Inspector

Ministry of Energy, Mines and Petroleum Resources

1810 Blanshard St., Victoria, BC V8T 4J1

W: 778-698-5454

s.22

From: Paul Teniere **s.22**
Sent: Thursday, August 15, 2019 7:20 PM
To: Brash, Jennifer EMPR:EX
Cc: Michael Raven; Lucas Birdsall
Subject: Cameo Industries Corp - MAX Moly Mine - Geotechnical Inspection

Hello Jennifer,

I am writing to inform you that Cameo Industries Corp (Cameo or the Company) is almost in a position to **provide a comprehensive response to the outstanding geotechnical inspection report for its MAX Moly Mine, which we anticipate filing by the end of August**. In the interim, the Company is providing the following reports and advises as follows:

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5. The Company's legal counsel (Michael Raven) has been in contact with Jerrold Jewsbury (Inspector of Mines) and kept him informed of the Company's progress.

We will provide further information as it becomes available.

Thank you,

Paul

cc: Michael Raven, Lucas Birdsall

Paul Teniere, M.Sc., P.Geo.

CEO and Director

Cameo Industries Corp

From: [Brash, Jennifer EMPR:EX](#)
To: [Paul Teniere](#)
Subject: RE: Mine
Date: June 3, 2020 6:26:12 PM

Thank you for the update. Please send the pictures once you receive them.

Regards,
Jennifer

From: Paul Teniere

Sent: June 3, 2020 6:51 AM

To: Brash, Jennifer EMPR:EX

Subject: Fwd: Mine

Hi Jennifer,

Please see message below I received from Sheryl Hermansen about conditions at MAX Mine after their visit yesterday. We avoided flooding issues due to the hard work by our site personnel to fix broken siphon lines from the winter due to heavy snow pack damage, siphoning a few weeks ago, and preemptive siphoning of the ponds last fall to prepare for the spring melt. Though this year was certainly an exception when it comes to heavy snow and rain in the Kootenays!

I will send further pictures once I receive them from s.22

s.22 at the moment so constantly monitoring. We just completed our Q2 water sampling program as well and waiting on lab results.

Talk soon,

Paul

Paul Teniere, M.Sc., P.Geo.

CEO and Director

Cameo Industries Corp

s.22

----- Forwarded message -----

From: s.22

Date: Tue, Jun 2, 2020 at 10:22 AM

Subject: Mine

To: Paul Teniere s.22

Morning Paul, just a quick note to ease your mind regarding the mine, all waterways are good no damage or flooding. Sure glad we took the time to prepare. s.22 will be in later this morning and I will forward pictures s.22

From: [Paul Teniere](#)
To: [Brash, Jennifer EMPR:EX](#)
Cc: [Narynski, Heather M EMPR:EX](#); [Craig, Andrew EMPR:EX](#); [Jewsbury, Jerrold EMPR:EX](#)
Subject: June 1 site photos - MAX Mine
Date: June 5, 2020 7:29:59 AM
Attachments: [IMG_0423.jpg](#)
[IMG_0421.jpg](#)
[IMG_0419.jpg](#)
[IMG_0418.JPG](#)
[IMG_0416.jpg](#)
[IMG_0415.jpg](#)
[IMG_0413.jpg](#)
[IMG_0412.jpg](#)

Hi Jennifer,

As promised, below are several pictures taken by s.22 at the MAX Mine site on June 1 after the flooding event this past weekend. He did not note any flooding related issues on the site and pond water levels were already low prior to the storm due to recent siphoning efforts so no flooding damage to report. s.22

s.22 and will be checking the site often and reporting any issues to me directly. I will advise you immediately of any issues if any come up over the next few weeks.

I understand Jerrold will also be on site next Wednesday to take a look and I have ensured he has key access to the site. We are also getting close to our annual DSI which I will be coordinating with BGC Engineering in the coming weeks along with the other remaining issues we need to attend to from last year's geotechnical inspection.

Talk with you soon,

Paul

Paul Teniere, M.Sc., P.Geo.

CEO and Director

Cameo Industries Corp

s.22

From: s.22

Date: June 4, 2020 at 6:06:37 PM PDT

To: s.22

Subject: June 1





Sent from my iPhone

























