

Page 001 to/à Page 007

Withheld pursuant to/removed as

s.14;s.16;s.13

Wheler, Francesca M IRR:EX

From: ABR FOI ABR:EX
Sent: Tuesday, August 8, 2017 3:05 PM
To: French, Shawna ABR:EX; Melles, Jennifer ABR:EX; Klotz, Heidi ABR:EX; Rogers, Dru ABR:EX; Joyce, Tonja ABR:EX; Ralph, Jeff ABR:EX; Sidhu-Scherer, Jeanette ABR:EX; Draeseke, Rob ABR:EX; Matsubuchi, Michael ABR:EX; Brunette, Greg ABR:EX; Ellis, Elisabeth ABR:EX; Karabegovic, Badema ABR:EX; Mah-Paulson, May ABR:EX; Gale, Stuart ABR:EX; Berkhout, Juanita ABR:EX; Weselowski, Allan ABR:EX; Parenteau, Rob G ABR:EX; Kelly, Susan M ABR:EX; Pye, Sara ABR:EX; Anslow, Martha ABR:EX; Spence, Karen ABR:EX; Wheler, Francesca M ABR:EX; Franklin, Janice ABR:EX; Smith, Dugald ABR:EX; Pilling, David ABR:EX; Hutchinson, Wendy ABR:EX; Donaldson, Nedinska ABR:EX; McCombs, Brendan ABR:EX; Puggioni, Giovanni ABR:EX; Gunnarsen, Krista A ABR:EX; Shaw, Rachel ABR:EX; Holmes, Rachel ABR:EX; Lofthouse, Mark ABR:EX; Dyck, Heinz ABR:EX; Balcaen, Trish L ABR:EX; Roberts, Lloyd E ABR:EX; Diller, Carina ABR:EX; Leece, Robert ABR:EX; Sheppard, Corinne ABR:EX; Kerr, Paul ABR:EX; Ronmark, Tracy C ABR:EX; Manuel, Jennifer ABR:EX; Giles, Wayne ABR:EX; Gash, Michael ABR:EX; Crockford, Dennis ABR:EX; Carey, Paul ABR:EX; Lizée, Yvette ABR:EX; Recknell, Geoff ABR:EX; Low, Bruce ABR:EX; Robertson, Linda G ABR:EX; de Waal, Penny ABR:EX; Schultz, Brandin ABR:EX; Morgan, Dale ABR:EX; Perrins, Greg ABR:EX; ABR Central Records Office; ABR Correspondence Unit ABR:EX; Armstrong, Bill N ABR:EX
Subject: FOI REQUEST ARR-2017-72663 - Volume Request due Aug. 11, 2017

Hi Senior Leadership Team,

We have received the following FOI request:

Regarding Taseko Mines Limited's approval from the Province – received July 14, 2017 - to undertake a site investigation program to conduct exploratory work at the New Prosperity Gold-Copper project site: Copies of briefing notes, media analyses, memorandums, and communications documents, press releases, Q&A documents, related to this project that were created, updated or modified. (Date Range for Record Search: From 07/14/2017 To 08/08/2017) – Date Format: MM/DD/YYYY

Please note the date range for this records search: from July 14 to August 8, 2017

Please work with your teams and identify if you have any records (emails, paper, electronic etc.) pertaining to the request by **NOON ON AUG. 11, 2017**. If you do please respond as a team with an estimate volume of:

Emails without attachments (in pages)	
Emails with attachments (in pages)	
Other documents (electronic files, e.g. pdfs, word docs etc.) (in pages)	
Hardcopy files (including black books) (in pages)	

Hours for locating/retrieving records	
Hours to format files into a PDF	
Hours to ensure completeness of responsive records	

**Thank you,
MIRR FOI TEAM**

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Withheld pursuant to/removed as

s.14;s.16;s.13

Wheler, Francesca M IRR:EX

From: Ponchet, Kim ABR:EX
Sent: Tuesday, August 1, 2017 1:34 PM
To: Wheler, Francesca M ABR:EX
Cc: Mayhew, Neilane ABR:EX
Subject: FOR APPROVAL: New Prosperity BN
Attachments: 2017_07_28_ LT Response from TML re Notice of Work activities.pdf; Letter from Fed govt - July 28 2017 - New Prosperity - Application of CEAA 2012.docx.pdf; 41818 BN - New Prosperity Notice of Work AUG 1 draft v5.docx

All I did was remove the initials at the end of the document as apparently that isn't required any more.

Neilane – over to you for final approval. Once you approve, we can send to MO to print for walk in tomorrow morning. Connie doesn't arrive until 8:30, so we need to send this to her today to have it printed for 8am tomorrow.

Thanks,

Kim Ponchet

Senior Executive Assistant to
Neilane Mayhew, Associate Deputy Minister
Ministry of Indigenous Relations & Reconciliation
Phone: 250-356-0226

From: Wheler, Francesca M ABR:EX
Sent: Tuesday, August 1, 2017 1:20 PM
To: Ponchet, Kim ABR:EX
Subject: RE: New Prosperity - DN & Call @ 5:15

Here's the note and attachments. Are you going to do your magic and then send me the final?

Francesca Wheler
(250) 360-6002

From: Ponchet, Kim ABR:EX
Sent: Tuesday, August 1, 2017 12:57 PM
To: Wheler, Francesca M ABR:EX
Subject: RE: New Prosperity - DN & Call @ 5:15

Hi sorry to bug – when can I expect this new version?

Kim Ponchet

Senior Executive Assistant to
Neilane Mayhew, Associate Deputy Minister
Ministry of Indigenous Relations & Reconciliation
Phone: 250-356-0226

From: Wheler, Francesca M ABR:EX
Sent: Tuesday, August 1, 2017 8:34 AM
To: Mayhew, Neilane ABR:EX
Cc: Ponchet, Kim ABR:EX
Subject: Re: New Prosperity - DN & Call @ 5:15

Okay. I'll send the new version shortly.

From: Mayhew, Neilane ABR:EX
Sent: Tuesday, August 01, 2017 8:27 AM
To: Wheler, Francesca M ABR:EX
Cc: Ponchet, Kim ABR:EX
Subject: Re: New Prosperity - DN & Call @ 5:15

That's probably it. I just wasn't sure if there was some additional comments in lifhtbod the discussion about the options. Maybe just do a quick check in this morning.

Neilane

Sent from my Samsung Galaxy smartphone.

----- Original message -----

From: "Wheler, Francesca M ABR:EX" <Francesca.Wheeler@gov.bc.ca>
Date: 2017-08-01 8:23 AM (GMT-08:00)
To: "Mayhew, Neilane ABR:EX" <Neilane.Mayhew@gov.bc.ca>
Cc: "Ponchet, Kim ABR:EX" <Kim.Ponchet@gov.bc.ca>
Subject: Re: New Prosperity - DN & Call @ 5:15

Okay. I did receive the s.13,s.14
didn't catch that on the call.

so will add that. What else was coming? I

F.

From: Mayhew, Neilane ABR:EX
Sent: Monday, July 31, 2017 8:15 PM
To: Wheler, Francesca M ABR:EX
Cc: Ponchet, Kim ABR:EX
Subject: FW: New Prosperity - DN & Call @ 5:15

I made only minor adjustments as you will see. Based on the call at 5:15 s.13,s.14
s.13,s.14

Neilane

From: Wheler, Francesca M ABR:EX
Sent: Monday, July 31, 2017 5:07 PM

To: Ponchet, Kim ABR:EX; Mayhew, Neilane ABR:EX
Subject: RE: New Prosperity - DN & Call @ 5:15

Final draft s.13,s.14
the earlier version sent at 4:29).

from

Francesca Wheler
(250) 360-6002

From: Ponchet, Kim ABR:EX
Sent: Monday, July 31, 2017 4:29 PM
To: Mayhew, Neilane ABR:EX
Cc: Wheler, Francesca M ABR:EX
Subject: New Prosperity - DN & Call @ 5:15

Forwarding as this came through with the meeting invite.....

Here is the latest version – with comments from Peter, Kate, Barbara, and s.13,s.14. Gerry has been tracking the emails but no comments or changes. Can you join the call? s.13,s.14

Francesca

Page 045 to/à Page 049

Withheld pursuant to/removed as

s.14;s.13

Wheler, Francesca M IRR:EX

From: Wheler, Francesca M ABR:EX
Sent: Tuesday, August 1, 2017 1:20 PM
To: Ponchet, Kim ABR:EX
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Attachments: 2017_07_28_ LT Response from TML re Notice of Work activities.pdf; 41818 BN - New Prosperity Notice of Work AUG 1 draft v5.docx; Letter from Fed govt - July 28 2017 - New Prosperity - Application of CEEA 2012.docx.pdf

Here's the note and attachments. Are you going to do your magic and then send me the final?

Francesca Wheler
(250) 360-6002

From: Ponchet, Kim ABR:EX
Sent: Tuesday, August 1, 2017 12:57 PM
To: Wheler, Francesca M ABR:EX
Subject: RE: New Prosperity - DN & Call @ 5:15

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Kim Ponchet
Senior Executive Assistant to
Neilane Mayhew, Associate Deputy Minister
Ministry of Indigenous Relations & Reconciliation
Phone: 250-356-0226

From: Wheler, Francesca M ABR:EX
Sent: Tuesday, August 1, 2017 8:34 AM
To: Mayhew, Neilane ABR:EX
Cc: Ponchet, Kim ABR:EX
Subject: Re: New Prosperity - DN & Call @ 5:15

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Sent: Tuesday, August 01, 2017 8:27 AM
To: Wheler, Francesca M ABR:EX
Cc: Ponchet, Kim ABR:EX
Subject: Re: New Prosperity - DN & Call @ 5:15

That's probably it. I just wasn't sure if there was some additional comments in lifhtbod the discussion about the options. Maybe just do a quick check in this morning.

Neilane

Sent from my Samsung Galaxy smartphone.

----- Original message -----

From: "Wheler, Francesca M ABR:EX" <Francesca.Wheler@gov.bc.ca>
Date: 2017-08-01 8:23 AM (GMT-08:00)
To: "Mayhew, Neilane ABR:EX" <Neilane.Mayhew@gov.bc.ca>
Cc: "Ponchet, Kim ABR:EX" <Kim.Ponchet@gov.bc.ca>
Subject: Re: New Prosperity - DN & Call @ 5:15

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didn't catch that on the call.

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Cc: Ponchet, Kim ABR:EX
Subject: FW: New Prosperity - DN & Call @ 5:15

I made only minor adjustments as you will see. Based on the call at 5:15 s.13,s.14
s.13,s.14

Neilane

From: Wheler, Francesca M ABR:EX
Sent: Monday, July 31, 2017 5:07 PM
To: Ponchet, Kim ABR:EX; Mayhew, Neilane ABR:EX
Subject: RE: New Prosperity - DN & Call @ 5:15

Final draft – s.13,s.14
the earlier version sent at 4:29).

from

Francesca Wheler
(250) 360-6002

From: Ponchet, Kim ABR:EX
Sent: Monday, July 31, 2017 4:29 PM
To: Mayhew, Neilane ABR:EX
Cc: Wheler, Francesca M ABR:EX
Subject: New Prosperity - DN & Call @ 5:15

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Francesca

Page 052 to/à Page 067

Withheld pursuant to/removed as

s.14;s.13

Wheler, Francesca M IRR:EX

From: Mayhew, Neilane ABR:EX
Sent: Monday, July 31, 2017 8:15 PM
To: Wheler, Francesca M ABR:EX
Cc: Ponchet, Kim ABR:EX
Subject: FW: New Prosperity - DN & Call @ 5:15
Attachments: 41818 DN - New Prosperity Notice of Work JUL 31 draft v2.docx

I made only minor adjustments as you will see. Based on the call at 5:15s.13,s.14
s.13,s.14

Neilane

From: Wheler, Francesca M ABR:EX
Sent: Monday, July 31, 2017 5:07 PM
To: Ponchet, Kim ABR:EX; Mayhew, Neilane ABR:EX
Subject: RE: New Prosperity - DN & Call @ 5:15

Final draft s.13,s.14
the earlier version sent at 4:29).

from

Francesca Wheler
(250) 360-6002

From: Ponchet, Kim ABR:EX
Sent: Monday, July 31, 2017 4:29 PM
To: Mayhew, Neilane ABR:EX
Cc: Wheler, Francesca M ABR:EX
Subject: New Prosperity - DN & Call @ 5:15

Forwarding as this came through with the meeting invite.....

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but no comments or changes. Can you join the call s.13,s.14

Francesca

Wheler, Francesca M IRR:EX

From: Wheler, Francesca M ABR:EX
Sent: Monday, July 31, 2017 5:07 PM
To: Ponchet, Kim ABR:EX; Mayhew, Neilane ABR:EX
Subject: RE: New Prosperity - DN & Call @ 5:15
Attachments: 41818 DN - New Prosperity Notice of Work JUL 31 draft v2.docx

Final draft - s.13,s.14
the earlier version sent at 4:29).

from

Francesca Wheler
(250) 360-6002

From: Ponchet, Kim ABR:EX
Sent: Monday, July 31, 2017 4:29 PM
To: Mayhew, Neilane ABR:EX
Cc: Wheler, Francesca M ABR:EX
Subject: New Prosperity - DN & Call @ 5:15

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Francesca

Page 070 to/à Page 073

Withheld pursuant to/removed as

s.14;s.13

Wheler, Francesca M IRR:EX

From: Ponchet, Kim ABR:EX
Sent: Monday, July 31, 2017 4:29 PM
To: Mayhew, Neilane ABR:EX
Cc: Wheler, Francesca M ABR:EX
Subject: New Prosperity - DN & Call @ 5:15
Attachments: 41818 DN - New Prosperity Notice of Work JUL 31 draft.docx

Forwarding as this came through with the meeting invite.....

Here is the latest version – with comments from Peter, Kate, Barbara, and ~~S.13,S.1~~. Gerry has been tracking the emails but no comments or changes. Can you join the call? ~~S.13,S.14~~

Francesca

Page 075 to/à Page 080

Withheld pursuant to/removed as

s.14;s.13

Wheler, Francesca M IRR:EX

From: Robb, Peter L. MEM:EX
Sent: Monday, July 31, 2017 3:36 PM
To: Wheler, Francesca M ABR:EX
Subject: Briefing Note for Decision - Taseko Mines
Attachments: Briefing Note for Decision - Taseko Mines.docx

Just two comments...I know it is not the correct version but I read the most recent and these are my only two comments

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Withheld pursuant to/removed as

s.14;s.13

Wheler, Francesca M IRR:EX

From: Mayhew, Neilane ABR:EX
Sent: Monday, July 31, 2017 12:57 PM
To: Wheler, Francesca M ABR:EX
Subject: Re: BN on Taseko

I won't have a chance to review now until tonight as I am in briefings with the minister from now until 5 pm. Why don't you wait and see if you get any feedback from Peter or Barbara and then send me the draft at the end of the day. You will not hear back from Erin as she is in court all day.

Neilane

Sent from my Samsung Galaxy smartphone.

----- Original message -----

From: "Wheler, Francesca M ABR:EX" <Francesca.Wheler@gov.bc.ca>
Date: 2017-07-31 12:34 PM (GMT-08:00)
To: "Mayhew, Neilane ABR:EX" <Neilane.Mayhew@gov.bc.ca>
Subject: RE: BN on Taseko

s.13,s.14

F.

Francesca Wheler
(250) 360-6002

From: Mayhew, Neilane ABR:EX
Sent: Monday, July 31, 2017 10:36 AM
To: Wheler, Francesca M ABR:EX
Subject: FW: BN on Taseko

Has this been run by EMPR^{s.1} and FLNR at the staff level? I would prefer to review something that has had their input first.^{3,s.}

Neilane

From: Wheler, Francesca M ABR:EX
Sent: Monday, July 31, 2017 9:27 AM
To: Mayhew, Neilane ABR:EX
Subject: BN on Taseko

Hi Neilane,
s.13,s.14

Francesca

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Withheld pursuant to/removed as

s.14;s.13

Wheler, Francesca M IRR:EX

From: Mayhew, Neilane ABR:EX
Sent: Monday, July 31, 2017 10:36 AM
To: Wheler, Francesca M ABR:EX
Subject: FW: BN on Taseko
Attachments: Briefing Note for Decision - Taseko Mines.docx

Has this been run by EMPR s.13, s.14 and FLNR at the staff level? I would prefer to review something that has had their input first.

Neilane

From: Wheler, Francesca M ABR:EX
Sent: Monday, July 31, 2017 9:27 AM
To: Mayhew, Neilane ABR:EX
Subject: BN on Taseko

Hi Neilane,

s.13,s.14

Francesca

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Withheld pursuant to/removed as

s.14;s.13

Page 105 to/à Page 112

Withheld pursuant to/removed as

s.14;s.16;s.13

Wheler, Francesca M IRR:EX

From: Parsons, Kate MEM:EX
Sent: Friday, July 28, 2017 3:45 PM
To: Wheler, Francesca M ABR:EX
Subject: J7_IN_Taseko_Notice of work application_Jul 28
Attachments: J7_IN_Taseko_Notice of work application_Jul 28.doc

Please use this version.

Thanks,
Kate

Wheler, Francesca M IRR:EX

From: Parsons, Kate MEM:EX
Sent: Friday, July 28, 2017 3:43 PM
To: Wheler, Francesca M ABR:EX
Subject: J7_IN_Taseko_Notice of work application_Jul 28
Attachments: J7_IN_Taseko_Notice of work application_Jul 28.doc

Hi Francesca,

I reworked the note to streamline it – I hope it still makes sense. s.13,s.14
s.13,s.14 The costs to date are pending from Mark Messmer and Neal Dobinson. I highlighted it as I took an educated guess at that based on my prior experience.

Have a look and we can chat about anything you have questions about. I did not flush out the options at all and will leave that in your hands. My cell is listed in my signature below if you need to chat on the weekend.

Kate



Kate Parsons, P.Eng
Regional Director, South Central Region
Mines and Mineral Resources Division
441 Columbia Street, Kamloops, BC V2C 2T3
Ministry of Energy, Mines and Petroleum Resources
Phone: 250-828-4448 (desk) 778-220-2958 (cell)

Page 115 to/à Page 116

Withheld pursuant to/removed as

s.14;s.13

Page 117 to/à Page 118

Withheld pursuant to/removed as

DUPLICATE

Wheler, Francesca M IRR:EX

From: Wheler, Francesca M ABR:EX
Sent: Friday, July 28, 2017 2:58 PM
To: Parsons, Kate MEM:EX
Subject: RE: J7_IN_Taseko_Notice of work application_Jul 13

Thanks Kate.

Francesca Wheler
(250) 360-6002

From: Parsons, Kate MEM:EX
Sent: Friday, July 28, 2017 2:25 PM
To: Wheler, Francesca M ABR:EX
Subject: FW: J7_IN_Taseko_Notice of work application_Jul 13
Importance: High

Hi Francesca, this is the most recent note with the NP background – I am actively working on adding in the economic piece but wanted you to see the note once I had it.

Kate

From: Hunt, Melanie MEM:EX
Sent: Friday, July 28, 2017 2:14 PM
To: Parsons, Kate MEM:EX
Subject: FW: J7_IN_Taseko_Notice of work application_Jul 13
Importance: High

Melanie

From: Haslam, David GCPE:EX
Sent: Thursday, July 20, 2017 12:59 PM
To: Caul, Doug D ABR:EX
Cc: Leslie, Lisa GCPE:EX; Ash, Christine GCPE:EX; Nikolejsin, Dave MNGD:EX; Robb, Peter L. MEM:EX
Subject: FW: J7_IN_Taseko_Notice of work application_Jul 13
Importance: High

s.13

Wheler, Francesca M IRR:EX

From: Parsons, Kate MEM:EX
Sent: Friday, July 28, 2017 2:25 PM
To: Wheler, Francesca M ABR:EX
Subject: FW: J7_IN_Taseko_Notice of work application_Jul 13
Attachments: J7_IN_Taseko_Notice of work application_Jul 13.doc; Biogeoclimatic Zones TNG Declared Title_170413 Ir.pdf

Importance: High

Hi Francesca, this is the most recent note with the NP background – I am actively working on adding in the economic piece but wanted you to see the note once I had it.

Kate

From: Hunt, Melanie MEM:EX
Sent: Friday, July 28, 2017 2:14 PM
To: Parsons, Kate MEM:EX
Subject: FW: J7_IN_Taseko_Notice of work application_Jul 13
Importance: High

Melanie

From: Haslam, David GCPE:EX
Sent: Thursday, July 20, 2017 12:59 PM
To: Caul, Doug D ABR:EX
Cc: Leslie, Lisa GCPE:EX; Ash, Christine GCPE:EX; Nikolejsin, Dave MNGD:EX; Robb, Peter L. MEM:EX
Subject: FW: J7_IN_Taseko_Notice of work application_Jul 13
Importance: High

s.13

Wheler, Francesca M IRR:EX

From: Chace, Julie MEM:EX
Sent: Thursday, July 27, 2017 5:23 PM
To: Robb, Peter L. MEM:EX; Wheler, Francesca M ABR:EX
Cc: Parsons, Kate MEM:EX
Subject: FYI: Taseko
Attachments: 887284.pdf; Fwd: Report on Economic Benefits of New Prosperity

Hi Peter and Francesca,

Attached is the only letter (sent to Francesca earlier this afternoon) I have been able to find that references compensating Taseko but there is no \$ figure included.

Also attached is a an economic impact report provided by Taseko in April . A few key \$ figures from the report:

- The total production revenues from the mine over the life of the project, are expected to be \$14.9 billion
- Increase in real GDP of \$12.7 billion
- Provincial BC government revenues rise by \$4.1 billion
- Federal government revenues rise by \$2.5 billion

Hopefully this helps...

Julie Chace

Executive Regional Director, MEM
Cell: (778) 677-6365

From: Chace, Julie MEM:EX
Sent: Thursday, July 27, 2017 4:26 PM
To: Parsons, Kate MEM:EX
Subject: FW: Emailing - 887284.pdf

Julie Chace

Executive Regional Director, MEM
Cell: (778) 677-6365

From: Chace, Julie MEM:EX
Sent: Thursday, July 27, 2017 2:27 PM
To: Wheler, Francesca M ABR:EX
Subject: FW: Emailing - 887284.pdf

Julie Chace
Executive Regional Director, MEM
Cell: (778) 677-6365

From: Hunt, Melanie MEM:EX
Sent: Thursday, July 27, 2017 1:41 PM
To: Chace, Julie MEM:EX
Subject: Emailing - 887284.pdf

Page 123 to/à Page 124

Withheld pursuant to/removed as

s.14;s.16;s.13

Page 125

Withheld pursuant to/removed as

s.14;s.13

Wheler, Francesca M IRR:EX

From: Mayhew, Neilane ABR:EX
Sent: Thursday, July 27, 2017 12:39 PM
To: Wheler, Francesca M ABR:EX
Subject: FW: J7_IN_Taseko_Notice of work application_Jul 13
Attachments: J7_IN_Taseko_Notice of work application_Jul 13.doc; Biogeoclimatic Zones TNG Declared Title_170413 Ir.pdf

Importance: High

Background,

From: Caul, Doug D ABR:EX
Sent: Wednesday, July 26, 2017 6:22 PM
To: Mayhew, Neilane ABR:EX
Cc: Harbord, Chris GCPE:EX
Subject: FW: J7_IN_Taseko_Notice of work application_Jul 13
Importance: High

Fyi and possible background for options paper

From: Haslam, David GCPE:EX
Sent: Thursday, July 20, 2017 12:59 PM
To: Caul, Doug D ABR:EX
Cc: Leslie, Lisa GCPE:EX; Ash, Christine GCPE:EX; Nikolejsin, Dave MNGD:EX; Robb, Peter L. MEM:EX
Subject: FW: J7_IN_Taseko_Notice of work application_Jul 13
Importance: High

s.13

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Withheld pursuant to/removed as

s.14;s.13

Wheler, Francesca M IRR:EX

From: Mayhew, Neilane ABR:EX
Sent: Thursday, July 27, 2017 12:31 PM
To: Wheler, Francesca M ABR:EX
Cc: Nash, Laurel ABR:EX; Banford, Alexandra R ABR:EX; Scott, Douglas S ABR:EX
Subject: RE: Urgent Request: Options BN
Attachments: RE: Taseko

From: Wheler, Francesca M ABR:EX
Sent: Thursday, July 27, 2017 12:29 PM
To: Mayhew, Neilane ABR:EX
Cc: Nash, Laurel ABR:EX; Banford, Alexandra R ABR:EX; Scott, Douglas S ABR:EX
Subject: RE: Urgent Request: Options BN

Will do. I don't see the email chain but just let me know what you need. I can get Rick and Peter rolling and if you want DK as well let me know.

Francesca Wheler
(250) 360-6002

From: Mayhew, Neilane ABR:EX
Sent: Thursday, July 27, 2017 12:03 PM
To: Wheler, Francesca M ABR:EX
Cc: Nash, Laurel ABR:EX; Banford, Alexandra R ABR:EX; Scott, Douglas S ABR:EX
Subject: Urgent Request: Options BN

s.13,s.14

Neilane Mayhew
Associate Deputy Minister and Chief Operating Officer
Ministry of Indigenous Relations and Reconciliation
Phone: 250 356-1439
Fax: 250 387-6073

Wheler, Francesca M IRR:EX

From: Mayhew, Neilane ABR:EX
Sent: Wednesday, July 26, 2017 12:03 PM
To: Wheler, Francesca M ABR:EX; Doug Konkin s.22 ; Trumpy, Chris
MEM:EX
Subject: FW: FYI copy of URGENT: Request for Call/ Meeting with Premier from Tsilhqotin National Government
Attachments: image002.png; ATT00001.htm; image002.png; ATT00002.htm; 2017 07 25 Tsilhqot'in Chiefs to Premier re Urgent Issues Nenqay Deni Accord.pdf; ATT00003.htm

Thanks Doug. I received the letter through our MO this morning. I haven't discussed yet with our Minister but expect he will want to take the meeting. It would be helpful if you could get some insight from Jay in terms of expectations.

Neilane

From: Doug Konkin [mailto:s.22]
Sent: Wednesday, July 26, 2017 11:36 AM
To: Mayhew, Neilane ABR:EX; Wheler, Francesca M ABR:EX; Trumpy, Chris MEM:EX
Subject: FYI copy of URGENT: Request for Call/ Meeting with Premier from Tsilhqotin National Government

FYI

Doug Konkin

Begin forwarded message:

From: Jay Nelson <jay@jaynelsonlaw.com>
Date: July 26, 2017 at 11:28:20 AM PDT
To: s.22
Subject: FW: URGENT: Request for Call/ Meeting with Tsilhqotin National Government

Doug, FYI, this letter went out yesterday from the Chiefs to the Premier in an effort to set the right tone for the relationship with the new government. We can discuss at noon.

All the best,

J.

Jay Nelson

Barrister & Solicitor

3219 Linwood Ave.

Victoria, BC V8X 1E5

778.678.4699 (p)

250.380.6560 (f)

From: Helen Nemeth <hnemeth@tsilhqotin.ca>
Date: Tuesday, July 25, 2017 at 4:57 PM
To: "premier@gov.bc.ca" <premier@gov.bc.ca>
Cc: "MEM.Minister@gov.bc.ca" <MEM.Minister@gov.bc.ca>, "ABR.Minister@gov.bc.ca" <ABR.Minister@gov.bc.ca>, "FLNR.Minister@gov.bc.ca" <FLNR.Minister@gov.bc.ca>, "ENV.Minister@gov.bc.ca" <ENV.Minister@gov.bc.ca>, Russ Mvers Ross s.22
Chief Stumpf s.22, Francis Laceese s.22 "Chief Ervin Charleyboy (ervin@tsideldel.org)" <ervin@tsideldel.org>, "Chief Joe Alphonse - Tl'etinqox (Anaham) (chiefjoe@tletingox.ca)" <chiefjoe@tletingox.ca>, 'Roger William' s.22
"Heather Squire (heather@ainchut.com)" <heather@ainchut.com>, Shawn Atleo <ShawnAtleo@ainchut.com>, Jay Nelson <jay@jaynelsonlaw.com>, "jlaplante@tsilhqotin.ca" <jlaplante@tsilhqotin.ca>
Subject: URGENT: Request for Call/ Meeting with Tsilhqotin National Government

Good afternoon, Premier Horgan,

Kindly see the attached urgent correspondence from the Leadership of the Tsilhqot'in National Government requesting an urgent meeting.

Sechanalyagh! Make today great!

Page 131 to/à Page 133

Withheld pursuant to/removed as

s.14;s.16;s.13

Wheler, Francesca M IRR:EX

From: Wheler, Francesca M ABR:EX
Sent: Tuesday, July 18, 2017 1:19 PM
To: Puggioni, Giovanni ABR:EX
Subject: FW: TNG press release re drilling permits during fire event

Francesca Wheler
(250) 360-6002

From: Trumpy, Chris MEM:EX
Sent: Monday, July 17, 2017 10:09 PM
To: Csicsai, Peter MEM:EX;s.22 Wheler, Francesca M ABR:EX
Subject: Fwd: TNG press release re drilling permits during fire event

FYI

Sent from my iPhone

Begin forwarded message:

From: "Haslam, David GCPE:EX" <David.Haslam@gov.bc.ca>
Date: July 17, 2017 at 10:01:21 PM PDT
To: "Robb, Peter L. MEM:EX" <Peter.Robb@gov.bc.ca>, "Pocklington, Cheryl M MEM:EX" <Cheryl.Pocklington@gov.bc.ca>, "Chace, Julie MEM:EX" <Julie.Chace@gov.bc.ca>, "McKnight, Elaine L MEM:EX" <Elaine.McKnight@gov.bc.ca>, "Trumpy, Chris MEM:EX" <Chris.Trumpy@gov.bc.ca>
Subject: Fw: TNG press release re drilling permits during fire event

Fyi below.

T̓SILHQOT'IN NATIONAL GOVERNMENT
253 – 4th Avenue North - Williams Lake, BC V2G 4T4 - Phone (250) 392-3918 -
Fax (250) 398-5798

PRESS RELEASE

**IN TIME OF CRISIS, B.C MAKES UNBELIEVABLE MOVE TO
APPROVE DRILLING PERMITS FOR TWICE REJECTED NEW
PROSPERITY MINE**

Tsilhqot'in forced to begin legal challenge while fighting wildfires

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Media Contact:

Graham Gillies

Communications Manager and Strategic Initiatives

Tsilhqot'in National Government

C: (604) 779-4221

ggillies@tsilhqotin.ca

JP Laplante

Mining, Oil & Gas Manager

Tsilhqot'in National Government

O: (250) 392-3918 C: (250) 267-3759

Leanne Ritchie

250 882 8232

On Jul 17, 2017, at 8:20 PM, Williams, Karen ABR:EX
<Karen.Williams@gov.bc.ca> wrote:

In case you are not aware, this issue is starting to get legs on social media tonight.

Thank you,
Karen

<IMG_20170717_201658.png>

Page 138 to/à Page 139

Withheld pursuant to/removed as

s.14;s.16;s.13

Wheler, Francesca M IRR:EX

From: Wheler, Francesca M ABR:EX
Sent: Tuesday, July 18, 2017 7:02 AM
To: Trumpy, Chris MEM:EX; Csicsai, Peter MEM:EX; dougwkonkin@gmail.com
Subject: Re: TNG press release re drilling permits during fire event

s.13,s.16

F,

From: Trumpy, Chris MEM:EX
Sent: Monday, July 17, 2017 10:09 PM
To: Csicsai, Peter MEM:EX s.22 Wheler, Francesca M ABR:EX
Subject: Fwd: TNG press release re drilling permits during fire event

FYI

Sent from my iPhone

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Date: July 17, 2017 at 10:01:21 PM PDT
To: "Robb, Peter L. MEM:EX" <Peter.Robb@gov.bc.ca>, "Pocklington, Cheryl M MEM:EX" <Cheryl.Pocklington@gov.bc.ca>, "Chace, Julie MEM:EX" <Julie.Chace@gov.bc.ca>, "McKnight, Elaine L MEM:EX" <Elaine.McKnight@gov.bc.ca>, "Trumpy, Chris MEM:EX" <Chris.Trumpy@gov.bc.ca>
Subject: Fw: TNG press release re drilling permits during fire event

Fyi below.

T̓SILHQOT'IN NATIONAL GOVERNMENT
253 – 4th Avenue North - Williams Lake, BC V2G 4T4 - Phone (250) 392-3918 -
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PRESS RELEASE

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Media Contact:

Graham Gillies

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Tsilhqot'in National Government

C: (604) 779-4221

ggillies@tsilhqotin.ca

JP Laplante

Mining, Oil & Gas Manager

Tsilhqot'in National Government

O: (250) 392-3918 C: (250) 267-3759

Leanne Ritchie

250 882 8232

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Thank you,
Karen

<IMG_20170717_201658.png>

Page 144 to/à Page 155

Withheld pursuant to/removed as

s.14;s.16;s.13

Page 156 to/à Page 157

Withheld pursuant to/removed as

DUPLICATE

Page 158

Withheld pursuant to/removed as

s.14;s.13

Page 159 to/à Page 174

Withheld pursuant to/removed as

s.14;s.21;s.13

Page 175 to/à Page 190

Withheld pursuant to/removed as

DUPLICATE

Page 191 to/à Page 276

Withheld pursuant to/removed as

s.14;s.16;s.13

Page 277 to/à Page 318

Withheld pursuant to/removed as

DUPLICATE

Page 319 to/à Page 330

Withheld pursuant to/removed as

s.14;s.16;s.13

Page 332 to/à Page 334

Withheld pursuant to/removed as

s.14;s.16;s.13

Appendix C

Emergency Response Plan



**PROSPERITY PROJECT
EMERGENCY RESPONSE
PLAN**

&

PROGRAM MANUAL

**ROAD ACCESSIBLE
EXPLORATION AND SITE
INVESTIGATION PROGRAM**

(TO BE POSTED AT ALL WORK SITES, COMPANY FACILITIES AND VEHICLES)

**NEW PROSPERITY PROJECT
BRITISH COLUMBIA**

EMERGENCY RESPONSE PLAN

SUMMARY INFORMATION

Prosperity Project:	Road accessible geotechnical drill program
Operated by:	Taseko Mines Limited 15th Floor - 1040 W. Georgia St. Vancouver, BC, V6E 4H1 778 373 4533 (t) 778-373-4534 (f)
Exploration Manager:	Scott Jones
Level 3 FAA's:	TBD.
Level 1 FAA's:	All field personnel, various others TBA
Mineral Permit:	MX-3-131
Prosperity Property:	NAD83 Zone 10U 463108, 5694057
Elkin Creek Guest Ranch:	Located ~ 2.5 hrs via road southwest of William's Lake. Situated the south end of Vedan Lake NAD83 Zone10U 443989, 5707118
Personnel on site:	up to 50

IN CASE OF EMERGENCY, CONTACT YOUR CREW CHIEF IN THE FIRST INSTANCE AND ADMINISTER FIRST AID AS NECESSARY. IF FURTHER ASSISTANCE IS REQUIRED, **CALL "MEDIC, MEDIC MEDIC"** ON THE **TBD** CHANNEL TO SUMMON A LEVEL 3 FIRST AID ATTENDANT. PLEASE ALSO CONTACT **TBD**, OR **WHITE SADDLE AIR HELICOPTERS ON 250 476 1182**, ANY OF WHOM WILL COORDINATE ASSISTANCE AND EVACUATION AS REQUIRED. BE PREPARED TO PROVIDE FULL INCIDENT DETAILS, YOUR LOCATION, MEANS BY WHICH YOU MAY BE CONTACTED AND YOUR NEEDS.

PERSONNEL EMERGENCY CONTACT DETAILS (EMPLOYER AND NEXT OF KIN) ARE UPDATED ON AN ONGOING BASIS AND MAY BE FOUND IN THE BINDER IN THE MAIN SITE OFFICE.

LIST OF EMERGENCY TELEPHONE NUMBERS

Name	Location	Phone
BC Ambulance	Emergency Only	1-800-461-9911
White Saddle Air, Helicopters	Tatla Lake	(250) 476-1182
Taseko Office	Vancouver	(778) 373-4538
William's Lake Hospital	William's Lake	(250) 392-4411
William's Lake RCMP	William's Lake	(250) 392-6211
Forest Fire Reporting	Province-wide	1-800-663-5555
Work Safe BC	Vancouver	1-800-663-6695
Ministry of Energy and Mines, Steve Rothman	Kamloops	(250) 319-2054
Ministry of Energy and Mines, Blythe Golobic	Kamloops	(778) 220-5852
Base Camp Sat Phone	TBD	TBD

LIST OF CONTRACTORS' TELEPHONE NUMBERS
To Be Submitted Prior to Commencement of Work

Name	Location	Phone
KNIGHT PIESOLD LIMITED Greg Smyth	Vancouver	(604) 685-0543
WHITE SADDLE AIR, HELICOPTERS Mike King		

SITE COMMUNICATION

Day to day field communications by radio should make use of the Yellowhead channel (programmed in all radios). Emergency communication should be made through the primary first aid attendant on site.

SATELLITE PHONES AND RADIO FREQUENCIES

Crew chiefs and Taseko Mines Limited (TKO) personnel will carry satellite phones with them at all times to be able to call for outside assistance. The following table lists the radio frequencies commonly used on the Williston Lake road system.

Frequency	Name	From	To
153.590	4500 Bush Road	0km (4500)	Prosperity Property
153.200	900 Road		

DRIVING INSTRUCTIONS TO PROSPERITY PROPERTY

- Travel west on HWY 20 from William's Lake to Lee's Corner (Hanceville), turning left;
- Then travel southwest for 64 km's on the Chilko Lake-Nemiah Valley gravel road;
- Continue driving to the Vicks Lake Road Junction then turn left;
- Travel approximately 21 km's along the 4500 Road to the site.

DRIVING INSTRUCTIONS TO PROSPERITY CAMP

To be determined and submitted when camp location is finalized prior to commencement of work

MEDIVAC PROTOCOL

1. In the event of an accident your crew chief is to be contacted who will assess the situation and determine whether further assistance is required. All accidents are to be reported to the first aid attendant.

2. If assistance is required the crew chief (or their designate) will contact the first aider by calling “Medic, Medic, Medic” on the TBD radio channel, who will determine the appropriate action, which may range from on-site treatment, through helicopter evacuation to William’s Lake. Upon hearing a medical alert via radio, all but those involved in the response should maintain radio silence.
3. In the event of helicopter evacuation the default location for pick up will be the Elkin Creek Guest Ranch Project base camp unless otherwise specified to, or by the pilot.
4. Emergency medivac from the Prosperity Project site will be to the hospital in William’s Lake.
5. Medivac to William’s Lake can be arranged via White Saddle Air, Helicopter (250) 476-1182.
6. Upon contacting White Saddle Air, Helicopters or Medic on duty, please specify the following:
 - The nature of injury or sickness;
 - The UTM Coordinates of the site of the injured person and the nearest helipad. All crews will be equipped with satellite telephones and GPS and will be able to provide location coordinates of the injured person.
 - The contact phone number
 - The weather and landing conditions at the helipad.
7. The appropriate WorkSafeBC forms should be completed: “First Aid Report”, “First Aid Record”, “Employer’s Report of Injury or Occupational Disease”, “Occupational First Aid Patient Assessment”. PERSONNEL EMERGENCY CONTACT DETAILS (EMPLOYER AND NEXT OF KIN) ARE UPDATED ON AN ONGOING BASIS AND MAY BE FOUND IN THE BINDER IN THE MAIN SITE OFFICE.

HAZARD ANALYSIS OF FIELD OPERATIONS

Crew members will be required to review the Health Safety and Reclamation Code for Mines in BC and the AMEBC Safety Guidelines Manual, and in addition will be given a site-specific safety and hazard identification indoctrination. Crew members will be trained and tested on the use of all communication and emergency response equipment.

Injuries to workers include those resulting from falls, incorrect posture while lifting, incorrect equipment and material handling, animal attacks, insect attacks, helicopter accidents, vehicle accidents, chain saw accidents, and cuts/burns related to daily camp activities

- All crew members will be informed of the potential hazards and provided with instructions (AME BC Safety Guidelines Manual) on how to avoid them.
- All crew members will be informed of the potential hazards related to bear/human interaction and provided with training on Taseko's Bear Aware Program.
- Each employee has been trained in emergency first aid, and provided with a first aid kit, EpiPen and radio to call for assistance in the event of an accident.
- Each crew will have access to a satellite telephone in order to contact a helicopter or ambulance for medivac. Medivac protocols are listed above
- The appropriate WorkSafeBC forms should be completed: "First Aid Report", "First Aid Record", "Employer's Report of Injury or Occupational Disease", "Occupational First Aid Patient Assessment".

Climatic hazards include those resulting from hypothermia, sunburn, heat stroke or dehydration.

- All crew members will be informed of the expected climate conditions and will be provided with the appropriate clothing in extreme conditions, survival kits and radios.

Care must be taken by all crew members to prevent **forest fires** while working in the field.

- Cigarettes must be extinguished carefully and completely and placed in a designated receptacle.
- Camp fires should be avoided when fire hazards are high unless absolutely necessary (hypothermia) and extinguished completely.
- Fire extinguishers, shovels, axes, chainsaws and satellite telephones will be kept onsite.
- If a fire is noted, members of the field crew should be contacted by radio and assembled at the specified evacuation point.
- The location of the fire should be reported to the Fire Protection Branch (800 663-5555).

EMERGENCY EQUIPMENT

Each employee working in the field shall be in possession of a handheld radio, and shall have ready access to a GPS unit, first aid kit, epipen and survival kit. All employees have valid emergency first aid course certificates and have been notified of the potential hazards and evacuation protocols. Crew members will be instructed in the use of all emergency and communications equipment. The **base camp** will be equipped with a BC No. 3 first aid kit, satellite telephone, fire extinguisher, shovel, axe and chainsaw. **Road transport** shall be the principal means of Medivac.

FUEL SPILL RESPONSE PLAN

1. The initial approach should be to **stop the spill**. In preparedness for a spill, each applicable item of equipment should be equipped with appropriate quantities of the following materials, which shall be near to hand:
 - Shovels to divert liquids, if necessary
 - Containment pans or spill skids for placement underneath equipment to collect drips/spills (to be lined with diesel diaper pads)
 - Diesel diapers or hydrocarbon absorbent pads (environmental matting) for soaking up spills or for use underneath drill motors, etc.
 - Hydrocarbon absorbent booms for soaking up spills
 - Spare tarps or impermeable PVC liner material for lining fuel berms or for the containment of saturated soils/materials
 - Emergency spill kits located at each piece of heavy equipment
2. Once the spill or leak has been stopped the next step shall be to **contain the spill** to keep it from spreading, which can be effected though the by use of booms, or pad adsorbents.
3. Ensure that no ignition sources exist in the spill area. There shall be absolutely no smoking in proximity to the spill.
4. Once the spill has been stopped and prevented from spreading then **report the spill** to the site manager.

PROJECT ROAD TRAVEL POLICY

Supervisors, staff, consultants and contractors when undertaking or overseeing road travel will:

1. Ensure project vehicles are operated in a safe, courteous and legal manner and in a way that attracts complimentary attention to the project.
2. Those failing to comply with the above will be allowed one warning. A repeat offence will result in discharge or request to be removed from the project.

TRAVEL AND TRANSPORTATION PROCEDURES

Staff, consultants and contractors, when organizing travel will contact the exploration manager or his designate with respect to such arrangements, being sure to state the work to be performed, helicopter requirements, departure and arrival dates and times, the number of people, and where applicable, special dietary requirements.

PROJECT LOCAL PURCHASING POLICY

Staff, consultants and contractors shall:

1. Request, in writing, price and availability for those goods and services required for the conduct of the work at the project site.
2. Compare the price and availability quotes received from other sources.
3. If the price is close or less than the other quotes and the availability satisfies the required need, then the local purchase should be accepted.
4. If the price is within the range but the availability is not, then the non-local purchase should be accepted.

DRUG AND ALCOHOL POLICY

The Company's premises and place of work are a drug free and alcohol free environment. Any personnel found to be under the influence, or in possession of either or any such substances will be removed from Company site at the expense of their employer.

COMMUNICATION PROCEDURES

1. Project communication via surface mail shall be thus addressed:

Taseko Mines Limited
15th Floor - 1040 W. Georgia St.
Vancouver, BC, V6E 4H8
778 373 4533 (t)
778 373 4534 (f)

2. All employee/contractor-related matters such as contracts, time sheets, and expense accounts shall in the first instance be referred to the site manager, as shall be any matters related to interaction with local communities and First Nations communities. No personnel are to engage in any strategic dialogue with members of First Nations communities with respect to the Prosperity project, unless mandated otherwise.
3. Project communication by e-mail shall be carbon copied to the following individuals:

Scott Jones	SJones@tasekomines.com
Katherine Gizikoff	KGizikoff@tasekomines.com

NOTES



**Mineral & Coal Exploration
Activities & Reclamation Permit**

(Issued pursuant to Section 10 of the *Mines Act* R.S.B.C. 1996, c.293)

Permit Number: **MX-3-131**

Mine No: **0300150**
Approval No: **17-0300150-0714**

Permittee: **Taseko Mines Ltd.**
15th Floor-1040 Georgia Street W
Vancouver BC V6E 4H1

Business Phone: **(250) 392-3100**
Fax: **(250) 392-3121**

Name of Property: **New Prosperity**

Reclamation security amount: **\$180,500**

For exploration and reclamation activities at the following mineral/coal tenures: **314007, 209325, 314028, 314029, 209326, 516849, 516785, 787863, 314006, 1030098, 1011666, 1011672, 1011668**

as described in the attached Notice of Work and Reclamation dated: **October 17, 2016 and Revised November 7, 2016**

Approved Activities

<input checked="" type="checkbox"/>	Access Roads, Trails, Heli Pads, Air Strips...	<input checked="" type="checkbox"/>	Mechanical Trenching/Test Pits
<input type="checkbox"/>	Application for Timber Cutting Authorization	<input type="checkbox"/>	Off-Tenure Access (SUP)
<input type="checkbox"/>	Blasting	<input checked="" type="checkbox"/>	Settling Ponds
<input checked="" type="checkbox"/>	Camps, Buildings and Staging Areas	<input type="checkbox"/>	Surface Bulk Sample
<input checked="" type="checkbox"/>	Cut Lines	<input type="checkbox"/>	Underground Exploration
<input checked="" type="checkbox"/>	Exploration Surface Drilling	<input type="checkbox"/>	Water Supply/Use

Date of Issuance: October 02, 2007

Date of Amendment: July 14, 2017

Rick Adams
Senior Inspector of Mines

The information on this form and any supporting documents are subject to the *Freedom of Information and Protection of Privacy Act*. The information requested on this form is collected and used for the purpose of administering the Mineral Exploration and Reclamation Permit. The *Mines Act* of British Columbia also authorizes the collection of the requested information on this form. The completed form is routinely available to the public. Questions about how the *Freedom of Information and Protection of Privacy Act* applies to the information collected on this form can be directed to the Mines Branch, phone (250)952-0492, fax (250)952-0491 or write to: PO Box 9320, Stn Prov Govt, Victoria, British Columbia, V8W 9N3.

Permit Conditions

- **Compliance with Mines Act and Code:**

All exploration activities must be conducted in a manner that complies with the *Mines Act* and the Health, Safety and Reclamation Code for Mines in British Columbia.

- **Start of Exploration Activities Notification:**

Verbal or written notification to the regional Inspector of Mines is required prior to the start date of exploration activity.

- **Uranium and Thorium:**

Exploration for uranium or thorium is not approved under this permit.

- **Changes to the Permitted Activities:**

The regional Inspector of Mines must be notified if the Permittee wishes to materially alter the exploration activities approved herein. Approval must be received from the regional Inspector of Mines prior to commencement of an amended program of exploration activities when described in a Schedule.

- **Annual Summary of Exploration Activities:**

An Annual Summary of Exploration Activities shall be submitted to the regional Inspector of Mines before the end of March of every year the permit is in effect. Reclamation and other exploration activities undertaken in the previous year shall be submitted in the form prescribed by the Chief Inspector of Mines.

- **Notice of Mine Closure:**

A Notice of Mine Closure must be submitted to the regional Inspector of Mines when exploration by a Permittee at a permitted site is permanently discontinued.

- **Others:**

Environmental Protection Management Plans

a) The permittee must ensure all staff and contractors working on the exploration site area are adequately trained in the Environmental Protection and Management Plans for: Working in or Near Streams and Wetlands; Archaeological Management Plan for Exploration; and Sensitive Vegetation and Wildlife Habitat Features; the Chance Find Procedures contained within above Environmental Protection and Management Plans; and the Mine Emergency Response Plan.

b) The permittee must ensure the Environmental Protection and Management Plans for: Working in or Near Streams and Wetlands; Archaeological Management Plan for Exploration; and Sensitive Vegetation and Wildlife Habitat Features; the Chance Find Procedures contained within above Environmental Protection and Management Plans; and the Mine Emergency Response Plan are implemented for the exploration program.

Assessments, Prescriptions, Notification and Access Restrictions

- c) The permittee must hire or contract a qualified cultural heritage monitor, with preference given to a qualified cultural heritage monitor nominated by the TNG (Tsilhqot'in National Government) should the TNG choose to nominate one, to conduct a cultural heritage assessment of all areas proposed for mechanical disturbance prior to disturbance.
- d) The permittee must hire or contract a qualified wildlife specialist with knowledge of the TNG's traditional food and medicine plants, with preference given to a qualified wildlife specialist nominated by the TNG should the TNG choose to nominate one, to develop reclamation prescription recommendations for the permittee's consideration and implementation for all newly disturbed areas where practicable.
- e) The permittee must notify the TNG on a weekly basis of the work completed within the last one week period, and the work planned for the upcoming two week period.
- f) In determining and implementing signage and access restrictions to ensure public and worker safety during the exploration program as required under the Code, the permittee must ensure the Mine Manager also gives consideration to the Tsilhqot'in's practice of their Aboriginal rights.

Minimizing Disturbance and Care in Construction

- g) The permittee must make all reasonable efforts to consult with the TNG and reach agreement on the preferred, and least impactful, route of access where options exist to locate trails either within standing timber or across open meadows.
- h) The permittee must utilize existing access or previously reclaimed access wherever possible, and locate new trails on gentle gradient slopes wherever possible, to minimize disturbance of the terrain and soils.
- i) For access trails that do require construction, the permittee must construct them with care, avoid grubbing, grading and blading wherever possible, and construct trails to the minimum dimensions required to meet operational and safety requirements.
- j) On exploration trails where heavier traffic will occur, the permittee must strip, salvage and windrow organic materials, and replace it when activities are completed.
- k) The permittee must locate new disturbances through pine-dominated forest and avoid clearing old forest of mixed species, wherever feasible.
- l) The permittee must ensure drill site, trench/test pit, and borrow site clearing is to the minimum amount of timber removal and disturbance required to meet operational and safety requirements.
- m) The permittee must carry out activities in a manner which minimizes soil loss, and must carry out progressive reclamation at all times subject to weather conditions.

Reclamation, Revegetation, Wildlife Forage, Wildlife Habitat Elements and Vehicle Access

- n) The permittee must retain potential furbearer denning trees wherever possible. Denning trees are cottonwood ≥ 90 cm diameter breast height, aspen ≥ 40 cm diameter breast height and lodgepole pine ≥ 35 cm diameter breast height.
- o) The permittee must retain furbearer forage areas of advanced coniferous regeneration and shrub understory wherever possible.
- p) The permittee must rip or otherwise de-compact all compacted surfaces.
- q) The permittee must retain or place >25 m³/ha of elevated coarse woody debris >20 cm diameter across all disturbance areas where sufficient coarse woody debris is available.

Mineral & Coal Exploration Activities & Reclamation Permit continued...

- r) The permittee must establish coarse woody debris piles ≥ 5 m across and ≥ 2 m high across the entrances of all exploration trails, and where exploration trails intersect meadows, where sufficient coarse woody debris is available.
- s) The permittee must revegetate all disturbed areas with natural wildlife forage species wherever possible, and must use forestry range agronomic mix only to the degree necessary to control noxious weeds or erosion, or where no natural revegetation option is available.
- t) The permittee must re-establish mixed coniferous species in all disturbed areas suitable for coniferous species utilizing ≥ 2 year old, bare root or large plug size seedlings.
- u) The permittee must immediately backfill test pits upon completion of geological mapping and sampling, replace organics, salvaged vegetation, and coarse woody debris, and revegetate.
- v) The permittee must reclaim drill sites by re-contouring as required, replacing topsoil, organics, salvaged vegetation and coarse woody debris, and revegetating prior to the completion of the site investigation program.
- w) The permittee must provide all disturbed exploration trails roads with appropriate drainage structures including water bars.
- x) The permittee must fully deactivate all new and reactivated exploration trail disturbances at the end of the multi-year work program.
- y) The permittee must reclaim exploration trails by pulling back any side cast material, re-contouring as required, replacing topsoil, organics, salvaged vegetation and coarse woody debris, and revegetating.

Wildlife Protection

- z) The permittee must plan activities to minimize mechanical disturbance during spring moose calving season.
- aa) During the spring and summer, the permittee must ensure that all helicopter activity related to this Notice of Work is confined to Fish Creek Valley, and away from the Taseko River Valley and west-facing bluffs.
- bb) The permittee must report all crane or crane nest observations to MFLNRO Wildlife staff and cease work in those immediate areas if cranes are noted. If sand hill cranes are confirmed to be nesting in the wetlands, the permittee must cease drilling activity within 500 m of the wetland nesting areas until August 1st or until after cranes have left the area.
- cc) The permittee must review wildlife-specific inventory information, particularly for bald eagle and osprey nests, to ensure these nests and other significant wildlife habitat features are not disturbed or destroyed, and record and report any new significant wildlife habitat features or species at risk identified to MFLNRO Wildlife staff if observed.
- dd) Upon receipt of at least 2 weeks notice from the TNG of the location(s) and timing of their two significant cultural gatherings planned for the summer, and their healing camp in the fall, the permittee must avoid operating heavy equipment within 500 m of the gathering site(s) for a period of up to 3 days, or other time period and setback distance as may be agreed to by TML with the TNG.

Water and Riparian Protection

- ee) The permittee must ensure that an emergency spill kit is available on site at all time of operations that is of suitable size to account for the volume of hydrocarbons on site. The permittee must ensure that all employees are trained in its use.

ff) The permittee must design the pump setups to capture hydrocarbon drips/leaks and prevent their release to the environment. The permittee must utilize a two-walled fuel tank, or secondary containment designed to capture 110% of fuel tank contents for pump fuel tanks.

gg) The permittee must utilize two-walled fuel tanks, or secondary containment designed to capture 110% of fuel tank contents, at all fuel storage sites.

hh) The permittee must contain and/or treat sediment contaminated water caused by any operation prior to discharge into any watercourse to ensure that there is no deposit of sediment, or any other deleterious substance, into any creek or its tributaries.

ii) The permittee must design and install all stream crossings to meet the minimum design peak flows identified within the Handbook for Mineral and Coal Exploration and Coal Exploration in British Columbia.

jj) The permittee must seal or grout all drill holes to prevent the discharge of water and/or potential contamination of groundwater upon completion, unless the drill holes will be used as sampling or monitoring wells.

Camp Location

kk) The permittee must establish the camp in proposed location B.



Notice of Work

0300150 - New Prosperity Project, Taseko Mines Limited

Tracking Number: 100185739

APPLICANT INFORMATION

If approved, will the authorization be issued to an
Individual or Company/Organization? Company/Organization

What is your relationship to the
company/organization? Employee

APPLICANT COMPANY / ORGANIZATION CONTACT INFORMATION

Please enter the contact information of the Individual/Organization who is acting on behalf of the applicant.

Name: TASEKO MINES LIMITED

Doing Business As:

Phone: 778-373-4538

Fax: 778-373-4534

Email: sjones@tasekomines.com

BC Incorporation Number: BC0069082

Extra Provincial Inc. No:

Society Number:

GST Registration Number: 119632693

Contact Name: Katherine Gizikoff

Mailing Address: 15th Floor-1040 Georgia Street W
Vancouver BC V6E 4H1

CORRESPONDENCE E-MAIL ADDRESS

If you would like to receive correspondence at a different email address than shown above, please provide the correspondence email address here. If left blank, all correspondence will be sent to the above given email address.

Email: kgizikoff@tasekomines.com

Contact Name: Katherine Gizikoff

TECHNICAL INFORMATION

APPLICATION INFORMATION

Type of Notice of Work: Mineral

Please be advised that exploration for Uranium or Thorium is not permissible.

Is this a New Permit or an Amendment to an
existing permit for this property? Amendment

Have you submitted an Annual Summary? Yes

ONE YEAR, MULTI-YEAR OR MULTI-YEAR AREA BASED PERMIT

One Year Permit

A One Year permit allows you to do your exploration activities over 1 year. You will have to identify the exact location/s for each proposed activity. At the end of the year you will have to submit an Annual Summary outlining the activities done during the previous year.

Multi-Year Permit

A Multi-Year permit allows you to do your exploration activities over 2-5 years. You will have to identify the exact location/s for each proposed activity. At the end of each year you will have to submit an Annual Summary outlining the activities done during the previous year.

Multi-Year, Area Based Permit

A Multi-Year, Area Based permit also allows you to spread your exploration activities over 2-5 years, but you must provide details of all exploration activities proposed in the first year, including proposed disturbances and estimated timber cutting. At the end of each year you will have to submit an Annual Summary and at the beginning of each new year you will have to submit a Multi-Year, Area-Based Work Program Annual Update, outlining your previous activities as well as your plans for the next year.

Type of permit to apply for: I would like to apply for a Multi-Year, Area Based permit
 Term of application: 3 years
 Is this the first year of your application? Yes

MINE INFORMATION

Do you have an existing mine number? Yes **Mine Number:** 0300150
Name of the property: New Prosperity Project, Taseko Mines Limited
Tenure Numbers: 314007, 209325, 314028, 314029, 209326, 516849, 516785, 787863, 314006, 1030098, 1011666, 1011672, 1011668
Crown Grant / District Lot Numbers:
Directions to site from nearest municipality: Travel west on Hwy 20 from William's Lake to Lee's Corner (Hanceville), then south southwest 64 km on the Chilko Lake-Nemiah Valley gravel road to the Vicks Lake Road Junction, then approximately 21 km on 4500 Road to the site
Geographic Coordinates of Mine: **Latitude:** 51.4500000 **Longitude:** -123.6000000
Maximum Annual Tonnage Extracted: 0 tonnes

INFORMATION ABOUT PROPOSED ACTIVITIES

Activities to be undertaken: Access roads, trails, heli pads, air strips and boat ramps
 Camps, Bldgs, Staging Areas and/or Fuel / Lubricants Storage
 Cut Lines and Induced Polarization Surveys
 Exploration Surface Drilling
 Mechanical Trenching / Test Pits
 Water Supply

FIRST AID

Proposed First Aid equipment on site: 2 way radio, portable satellite phone, helicopter support (if required), epipens, Level 2 and 3 First Aid kits, Emergency Transport Vehicle doubling as the dressing station. See attached Emergency Response Plan
Level of First Aid Certificate held by attendant: Occupational First Aid Level 3

DESCRIPTION OF WORK PROGRAM

If you prefer to upload a document, please enter "see attached document" and attach the document in the "Document Upload" step later in the application under "Other".

Sufficient details of your work program to enable a good understanding of the types and scope of the activities that will be conducted:
 See attached "Description of Work" document

TIME OF PROPOSED ACTIVITIES

Original Start Date: Jan 1, 2017
Proposed start and end date: Jan 1, 2017 to Dec 31, 2019

Please remember that you need to give 10 days notice to the Inspector of Mines of your intention to start work, and 7 days notice of your intention to stop work.

ACCESS

Access presently gated: No

PRESENT STATE OF LAND

Please identify what the present state of the land is where you would like to undertake your activities. If some of the questions do not apply to you please enter n/a in the space provided.

Present condition of the land:	The proposed exploration site and surrounding areas have experienced disturbance associated with previous exploration, forest harvesting, and recreational activities. A forest recreation site is located on the north end of Fish Lake
Type of vegetation:	Mature pine and spruce stands, wetland and meadow complexes are present.
Physiography:	Subdued topography with elevations ranging from 1450 m to 1600 m above sea level. Wetlands are present in valley bottoms while pine and spruce stands dominate at higher elevations
Current means of access:	Existing Forest Service Roads and exploration trails associated with previous programs
Old equipment:	2 small cabins are present at Little Fish Lake, approximately 350 square feet. These are not owned by, or associated with Taseko
Recreational trails / use:	A network of ATV and horse trails are present between Fish Lake and Little Fish Lake, some of which have been used in the past and are possibly periodically still used by Taseko Lake Lodge as commercial recreational trails

ACCESS TO TENURE

Do you need to build a road, create stream crossings or other surface disturbance that will not be on your tenure?	No
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LAND OWNERSHIP

Application area in a community watershed:	No
Proposed activities on private land:	No

Activities in a park:	No
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CULTURAL HERITAGE RESOURCES

Cultural Heritage applies to a large spectrum of heritage resources that is defined as "an object, a site or the location of a traditional societal practice that is of historical, cultural or archaeological significance to British Columbia, a community or an aboriginal people."

The Archaeology Branch of the Ministry of Forests, Land and Natural Resource Operations is responsible for the administration of the Heritage Conservation Act as it applies to archaeological sites. The Archaeology Branch has developed guidelines for companies engaged in natural resource extraction to aid in planning for and avoiding or managing impacts to protected archaeological sites.

Are you aware of any protected archaeological sites that may be affected by the proposed project?	Yes
--	-----

Please enter a description into the field below or attach a copy of the plan describing how you propose to protect the protected archaeological site by uploading it at the "Document Upload" step later in the application process. If you are attaching a plan later please enter in the text box "See plan attached"

Plan to protect the archaeological site:	See attached "Archaeological Management Plan for Exploration" document
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FIRST NATIONS ENGAGEMENT

In making decisions on authorizations, the government will be fulfilling its responsibility to consult, and where appropriate, accommodate First Nations. The government takes this responsibility seriously and encourages the applicant to engage First Nations early and often as part of any planned development.

Establishing good relations with First Nations who might be affected by a proposed development is a key part of any successful mining operation. The Ministry of Energy and Mines encourages applicants to engage and information share with First Nations that might be

affected by a proposed development prior to submitting an application. The earlier in the life of a proposed activity that the avenues of communication are established the greater the likelihood that the relationships formed will be constructive and beneficial to all parties. A lack of information sharing and engagement by the applicant may result in extended timeframes for decision.

Applicants should keep a detailed record of information sharing and engagement with First Nations on their project in the event the government needs to review it. Information on First Nations information sharing and engagement should include the following: a list of First Nations contacted, whether the activity was modified based on feedback from First Nations, and whether the applicant has entered into any informal or formal agreements with First Nations in connection with the project.

The Consultative Areas Database Public Map Service is an online, interactive mapping tool that allows you to identify First Nations who have treaty rights or asserted or proven rights or title on the land base. More information can be found at <http://maps.gov.bc.ca/ess/sv/cadb/>.

Have you shared information and engaged with First Nations in the area of the proposed activity? Yes

Please tell us about your engagements in the field below or attach a your record of engagement by uploading it at the "Document Upload" step later in the application process. If you are attaching your record later, please enter in the text box "See record attached". Please ensure your record does not contain an individual's personal information such as contact information.

Describe your First Nations engagement activities: See attached "New Prosperity 2017 NOW First Nations Engagement 161028"

As a result of the engagement, are you aware of any cultural heritage resources in the area where the work is proposed? Yes

Please tell us about your findings in the field below or attach a document by uploading it at the "Document Upload" step later in the application process. If you are attaching a document please enter in the text box "See attached document".

Describe any cultural heritage resources in the area: No new information on cultural heritage has been obtained as part of the engagement to date on this application. Tsilhqot'in input as part of past federal panel reviews of the Prosperity and New Prosperity projects included testimony that Fish Lake (Tetzan Biny), Nabas, which includes the meadows, and Little Fish Lake (Y'anah Biny) are used for traditional purposes and as part of their cultural heritage. Disturbances from the exploration program would be temporary, and reversible. Specific testing activities and access trails will be located to minimize disturbance and avoid all known archaeology sites.

CAMPS, BUILDINGS, STAGING AREAS AND FUEL / LUBRICANTS STORAGE

This section covers the construction of new camps and/or buildings as well as the storage of fuel/lubricants on the exploration/mine site.

The construction and operation of industrial camps (where more than five people will be accommodated) are regulated under the Health Act and its supporting regulations. Permits may be required for different aspects of camp operation. Contact the nearest Regional Health Authority to determine which requirements will apply to your camp.

You must also contact the BC Safety Authority and WorkSafe BC. For more information regarding Industrial Camp Regulation please see <http://www2.gov.bc.ca/gov/content/health/keeping-bc-healthy-safe/industrial-camps>.

If water for camp operation is taken from any surface source other than a well, a licence or an approval maybe required under the Water Act. For further information please contact FrontCounter BC.

MAPS

If known, mark the locations of camps, buildings and fuel storage on the maps, show the distance of activity from known streams, wetlands or lakes on the map.

You will upload the maps at the document upload step later in the application process.

If locations are not determined you must provide a location map with your start up notification at least 10 days prior to start-up. Camps, buildings and fuel storage must comply with riparian setbacks as set out in Section 9 of the Code and the guidance provided in the Handbook for Mineral & Coal Exploration.

CAMPS

Click on the "Add Camp" button to add a camp. If you have multiple camps please give each camp a distinctive name like Camp 1 which you can reference on the maps you submit with your application.

Name	Number of people	Number of structures	Estimated quantity of water (m ³ /s)	Disturbed Area (ha)	Merchantable timber volume (m ³)
Base Camp	50	11	0.01	1.00	0.00
Description of structures:	All camp structures will consist of mobile trailer units supplied through a camp contractor. Each structure will be equipped with utilities suited to the purpose of each unit. There will be five, 10 person sleeping trailers, two toilet/shower/laundry trailers, one kitchen, one dining, one storage and one office trailer.				
Waste disposal methods:	All waste produced on site will be stored in secure purpose built containers that will be replaced and transported to Gibraltar Mines land fill facility on an as needed basis.				
Sanitary facilities:	These facilities will be provided by the camp contractor. Sewage and grey water will be stored in Mobile Septic Holding tanks that will be pumped out as required. This sewage will be then transported and disposed of at an approved sewage treatment facility in Williams Lake.				
Water source:	To be determined when camp location finalized				
Total:				1.00	0.00

If your camp is planned for more than 5 people please be advised that the Industrial Camp regulations will apply.

Have you notified the local Health Authority as you have a camp for more than 5 people planned? No

The operation of an industrial camp is prescribed as a regulated activity under the Public Health Act. An industrial camp operator must comply with the requirements of the Industrial Camps Regulation. More information can be found under <http://www.health.gov.bc.ca/protect/industrial-camps.html>.

☒ Check here to indicate your consent to share your name, address and contact information with the local Health Authority for the purpose of assessing compliance with the Industrial Camps Regulation.

BUILDINGS

Click on the "Add Building" button to add a building. If you have multiple building please give each building a distinctive and descriptive name like "Shop" or "Storage 1" which you can reference on the maps and drawings you submit with your application. Please note that all buildings must adhere to the following Codes, BC Building Code, BC Fire Code and CSA Standard M421-00 "Use of Electricity in Mines in conjunction with the Canadian Electrical Code. All plans must be submitted at least 60 days prior to the proposed start of construction to the Inspector. The Inspector will advise if additional documents are required.

Name	Disturbed Area (ha)	Merchantable timber volume (m ³)
Temporary Core Shed	0.10	0.00
Purpose of the building:	Storage of drill core and housing for core splitting, logging and sample preparation equipment.	
Structure and dimensions:	Temporary tent or "Sprung Structure", approximately 5m x 10m	
Total:	0.10	0.00

STAGING AREA

Click on the "Add Staging Area" button to add a staging area. If you have multiple staging areas please give each staging area a distinctive and descriptive name like "Area 1" or "Area 2" which you can reference on the maps and drawings you submit with your application.

Name	Disturbed Area (ha)	Merchantable timber volume (m ³)
Base Camp Staging Area	1.00	0.00
Total:	1.00	0.00

FUEL / LUBRICANT STORAGE

If you are planning to handle, transport or store fuel and/or lubricants you must adhere to B.C. Environmental standards as detailed in "Summary of Environmental Standards and Guidelines for Fuel Handling, Transportation and Storage".

Do you propose to store fuel / lubricants on site? Yes

How much fuel do you want to store?
Storage method(s):

10,000 litres
Bulk

RECLAMATION PROGRAM

Describe the proposed reclamation and timing for this specific activity:

At the end of exploration activities, all materials and infrastructure will be removed from the camp, core shed, staging and fuel storage area. Soils will be decompacted, and seeded with approved forestry seed mix.

Estimated cost of reclamation activities described above:

\$10,500.00

MECHANICAL TRENCHING / TEST PITS

MAPS

Unless this is an area based application mark the locations of the proposed trenches/pits on the map. You will upload the maps at the document upload step later in the application process.

ACTIVITIES

Click on the "Add Activity" button to add one or more activities. Select your activity out of the list and enter the disturbed area and timber volume.

Activity	Number of sites	Disturbed Area (ha)	Merchantable timber volume (m³)
Trenches and Test Pits	367	1.10	44.00
Total:		1.10	44.00

RECLAMATION PROGRAM

Describe the proposed reclamation and timing for this specific activity:

The typical work sequence for a test pit is to remove all woody debris and organic material to a separate pile, following which the test pit is then excavated and logged. The test pit is immediately backfilled and the organics and woody debris placed over the backfilled site. Soil disturbances are seeded with approved forestry mix. A photographic record of the test pit site prior to excavation and following reclamation is maintained.

Estimated cost of reclamation activities described above:

\$11,000.00

EXPLORATION SURFACE DRILLING

MAPS

Unless this an area based application mark the locations of the proposed surface drilling on the map. The maps will be uploaded at the document upload step later in the application.

ACTIVITIES

Click on the "Add Activity" button to add one or more activities. Select your activity out of the list and enter the disturbed area and timber volume.

Activity	Number of sites	Disturbed Area (ha)	Merchantable timber volume (m³)
Geotechnical	122	6.00	240.00
Total:	122	6.00	240.00

SUPPORT OF DRILL PROGRAM

The drill program will be: Ground supported

RECLAMATION PROGRAM

Describe the proposed reclamation and timing for this specific activity:

All drill sites are to be reclaimed as drilling at each site is completed and prior to the completion of the site investigation program. Following completion of the drill hole, sumps will be backfilled with the original material excavated, all debris will be removed from the drill pad and stockpiled organic material that was collected prior to drilling will be spread, and seeded with an appropriate forestry approved seed mix.

Please describe the location of the Core Storage (including latitude and longitude if known):

Core will be stored at the Camp Core Shed for the first year and then relocated to Taseko's operating Gibraltar Mine core storage facility at the mine site.

Estimated cost of reclamation activities described above:

Gibraltar Mine Site -latitude 52 degrees 30'N and longitude 122 degrees 16'W
\$72,000.00

ACCESS ROADS, TRAILS, HELI PADS, AIR STRIPS AND BOAT RAMPS**MAPS**

Mark the locations of the proposed access roads and trails on the map. The maps will be uploaded at the document upload step later in the application.

ACTIVITIES

Click on the "Add Activity" button to add one or more activities. Select your activity out of the list and enter the length in km, the total disturbed area and total merchantable timber volume.

Activity	Length (km)	Disturbed Area (ha)	Merchantable timber volume (m ³)
Excavated Trail - New	48.00	20.00	800.00
Existing Access Modification	28.00	16.00	0.00
Total:	76.00	36.00	800.00

BRIDGES, CULVERTS AND CROSSINGS

Are you proposing any bridges, culverts and/or other river / stream crossings? Yes

Please review and observe "Working near water in BC" by Fisheries and Oceans Canada.

Describe the changes and reference the locations on the map you will need to attach later in the application:

Small temporary portable bridges will be placed across the Tributary1 and Upper Fish Creek streams. Proposed locations are shown on attached Figure 4.

RECLAMATION PROGRAM

Describe the proposed reclamation and timing for this specific activity:

The temporary access routes will be constructed by falling trees as required to develop a trail of safe trail width; during construction, the topsoil and woody debris will be windrowed to the side of the trail. Access routes will be reclaimed by pulling back any side cast material, re-contouring as required; top-dressing with available topsoil and woody debris; and, seeding with approved forestry seed mix.

Estimated cost of reclamation activities

\$85,000.00

described above:

ADDITIONAL INFORMATION

Please note that you may require a Special Use Permit under the Forest Practices Code of British Columbia Act or a Land Act tenure or other authorization under the legislation to use roads to access your tenure.

For further information please contact FrontCounter BC.

WATER SUPPLY**MAPS**

Mark the locations of all proposed water intakes, settling ponds and/or sediment control structures on the appropriate maps.

SOURCE OF WATER

Click on the "Add Source" button to add one or more water sources.

Source	Activity	Water Use	Estimated Rate (m ³ /s)
Fish Lake	Cooling	Drilling	0.01
Pump size in water (inches): 4 Location of water intake: To be determined based upon road access and drill locations Please clearly mark the locations of all water intakes on the maps uploaded in Step 6 - Document Upload.			
Little Fish Lake	Cooling	Drilling	0.01
Pump size in water (inches): 4 Location of water intake: To be determined based upon road access and drill locations Please clearly mark the locations of all water intakes on the maps uploaded in Step 6 - Document Upload.			
Middle Fish Creek	Cooling	Drilling	0.01
Pump size in water (inches): 4 Location of water intake: To be determined based upon road access and drill locations Please clearly mark the locations of all water intakes on the maps uploaded in Step 6 - Document Upload.			
Upper Fish Creek	Cooling	Drilling	0.01
Pump size in water (inches): 4 Location of water intake: To be determined based upon road access and drill locations Please clearly mark the locations of all water intakes on the maps uploaded in Step 6 - Document Upload.			
Wasp Lake	Cooling	Drilling	0.01
Pump size in water (inches): 4 Location of water intake: To be determined based upon road access and drill locations Please clearly mark the locations of all water intakes on the maps uploaded in Step 6 - Document Upload.			
Middle Fish Creek	Work Camps	Camp water Supply (non-potable)	0.01
Pump size in water (inches): 4 Location of water intake: To be determined based upon final camp location Please clearly mark the locations of all water intakes on the maps uploaded in Step 6 - Document Upload.			
Tributary 1 (upstream of Fish Lake)	Work Camps	Camp water supply (non-potable)	0.01
Pump size in water (inches): 4 Location of water intake: To be determined with final camp location			

Please clearly mark the locations of all water intakes on the maps uploaded in Step 6 - Document Upload.

Total: **0.07**

CUT LINES AND INDUCED POLARIZATION

MAPS

Unless this is an area based application mark the locations of the proposed exploration grids on the map. The maps will be uploaded at the document upload step later in the application.

EXPLORATION GRID

Total Line Kilometers: 20.00 km
Total disturbed area: 2.00 ha
Total merchantable timber volume: 0.00 m3

RECLAMATION PROGRAM

Describe the proposed reclamation and timing for this specific activity: Cut lines will be of minimal impact and will be developed by light brushing as required to develop a straight line approximately 1 m in width. where necessary, lines will be reclaimed by seeding with approved forestry seed mix.

Estimated cost of reclamation activities described above: \$2,000.00

TIMBER CUTTING

Total merchantable timber volume: 1,084.00 m3

Occupant Licence to CutBased on the information that you provided, you will require an Occupant Licence to Cut as the total volume of merchantable timber exceeds 50 m3. This will require a separate application package from your Notice of Work. The services of a forest professional will be necessary in order to submit the required appraisal information.

EQUIPMENT

Click on the "Add Equipment" button to add one type of equipment at a time. All equipment must comply with the requirements of the Health, Safety and Reclamation Code.

Quantity	Type	Size / Capacity
2	Bulldozer/Crawler Tractors	Cat D6 and D7
1	Drill	NQ/HQ Diamond Rig
1	Drill	Mud Rotary Rig
1	Drill	Sonic Rig
1	Drill	Hydrogeology Odex Rig
1	Drill	Hydrogeology RC/DC Rig
2	Excavator	1 x 20 tonne and 1 x 30 tonne
1	Loader	Cat 924
1	Other: Feller Buncher	CAT 522
1	Other: Power Supply	150kW

SUMMARY OF RECLAMATION

Based on the information you have provided on the previous screens the Summary of Reclamation is:

Activity	Total Affected area	Estimated cost of
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	(ha)	reclamation (\$)
Access roads, trails, etc.	36.00	85,000.00
Camps, Buildings, etc.	2.10	10,500.00
Cut Lines, etc.	2.00	2,000.00
Exploration Surface Drilling	6.00	72,000.00
Mechanical Trenching, etc.	1.10	11,000.00
Subtotal:	47.20	180,500.00
Unreclaimed disturbance from previous year:	2.18	
Disturbance planned for reclamation this year:	20.00	
Total:	29.38	180,500.00

OTHER CONTACTS

Please enter the contacts that are applicable to your application.

Contact Info	Type of Contact
Name: Scott Jones Phone: 778-373-4538 Daytime Phone: Fax: Email: sjones@tasekomines.com Mailing Address: 15th Floor-1040 West Georgia Street Vancouver BC V6E4H1	Mine manager

Contact Info	Type of Contact
Name: Taseko Mines Limited Doing Business As: Phone: 778-373-4533 Fax: 778-373-4534 Email: BC Inc. Number: BC0069082 GST Registration Number: 119632693 Contact Name: Mailing Address: 15th Floor-1040 West Georgia Street Vancouver BC V6E4H1	Permittee

Name: Taseko Mines Limited Doing Business As: Phone: 778-373-4533 Fax: 778-373-4534 Email: BC Inc. Number: BC0069082 GST Registration Number: 119632693 Contact Name: Mailing Address: 15th Floor-1040 West Georgia Street Vancouver BC V6E4H1	Tenure Holder
--	---------------

Name: Taseko Mines Limited Doing Business As: Phone: 778-373-4533 Fax: 778-373-4534 Email: BC Inc. Number: BC0069082	Site operator
---	---------------

GST Registration Number: 119632693
Contact Name:
Mailing Address: 15th Floor-1040 West Georgia Street
 Vancouver BC V6E4H1

LOCATION INFORMATION

All applications must include the appropriate maps and applications received without maps will be returned. All maps must be in colour, computer generated, with a scale, north arrow and a detailed legend.

For Mineral, Coal and Placer applications you must provide a minimum of 3 maps:

- A Location Map which must show the location of the property in relation to the nearest community with the access route from the community to the work site clearly marked;
- A Tenure Map which must show the boundaries of the tenure(s) and tenure numbers, at a scale of 1:20,000 or less;
- A Map of Proposed Work which must show topography, water courses, existing access, existing disturbance, contour lines, known cultural heritage resources and/or protected heritage property, at a scale of 1:10,000 or 1:5,000. For site specific applications the location of all proposed exploration activities must be shown; for area-based applications the work area must be shown as a polygon, with the location of all proposed exploration activities for year 1 shown, and shape files provided of the area.

For Sand & Gravel/Quarry applications you must provide a Plan View, Cross and Longitudinal Sections and a Land Title/Crown Land Tenure Map. Details of these requirements are listed in the Sand & Gravel/Quarry Operations Activity sheet.

☒ I have one or more files (PDF, JPG, PNG etc.) with my maps

MAP FILES

Do you have a PDF or image file of a drawn map? You can upload it here.

Description	Filename
Location Map	Fig1_ProjectLocation_r0.pdf
Map of areas for multi-year area based work	Fig5_NoW_MultiyearWorkAreas...
Map of proposed year 1 work	Fig4_NoW_SILocationsAndArea...
Tenure Map	Fig2_TenureMap_r0.pdf
Work areas, topography, existing disturbance, archaeology sites	Fig3_ProposedWorkAreas_r0.pdf

☒ I have shape files from my Geographic Information System

SPATIAL FILES

Do you have a spatial file from your GIS system? You can upload it here.

Description	Filename
Component of multi-year area based shapefiles	MultiyearSIAreas.dbf
Component of multi-year area based shapefiles	MultiyearSIAreas.prj
Component of multi-year area based shapefiles	MultiyearSIAreas.shx
Component of multi-year area based shapefiles	MultiyearSIAreas.sbx
Component of multi-year area based shapefiles	MultiyearSIAreas.shp
Component of multi-year area based shapefiles	MultiyearSIAreas.sbn

ATTACHED DOCUMENTS

Document Type	Description	Filename
Archaeological Chance Find Procedure	Archaeology management plan and chance find procedures	Archaeological Management P...
Mine Emergency Response Plan	Emergency response plan	Emergency Response Plan.pdf
Other	Description of work program	Description of Work.pdf
Record of First Nations Engagement	Description of First nations engagement	New Prosperity 2017 NOW Fir...

PRIVACY DECLARATION

PRIVACY NOTE FOR THE COLLECTION, USE AND DISCLOSURE OF PERSONAL INFORMATION

Personal information is collected by FrontCounter BC under the legal authority of section 26 (c) and 27 (1) of the Freedom of Information and Protection of Privacy Act (the Act).

The collection, use, and disclosure of personal information is subject to the provisions of the Act. The personal information collected by FrontCounter BC will be used to process your inquiry or application(s). It may also be shared when strictly necessary with partner agencies that are also subject to the provisions of the Act. The personal information supplied in the application package may be used for referrals or notifications as required. Personal information may be used by FrontCounter BC for survey purposes. For more information regarding the collection, use, and/or disclosure of your personal information by FrontCounter BC, please contact FrontCounter BC at 1-877-855-3222 or at:

FrontCounter BC Program Director
FrontCounter BC, Provincial Operation
441 Columbia Street
Kamloops, BC V2C 2T3

☒ Check here to indicate that you have read and agree to the privacy declaration stated above.

REFERRAL INFORMATION

Some applications may also be passed on to other agencies, ministries or other affected parties for referral or consultation purposes. A referral or notification is necessary when the approval of your application might affect someone else's rights or resources or those of the citizens of BC. An example of someone who could receive your application for referral purposes is a habitat officer who looks after the fish and wildlife in the area of your application. This does not apply to all applications and is done only when required.

Please enter contact information below for the person who would best answer questions about your application that may arise from anyone who received a referral or notification.

Company / Organization: TASEKO MINES LIMITED
Contact Name: Katherine Gizikoff
Contact Address: 15th Floor-1040 Georgia Street W
Vancouver BC V6E 4H1
Contact Phone: 250-305-5170
Contact Email: kgizikoff@tasekomines.com

☒ I hereby grant permission for the public release of the information provided above. This information will be used to fulfill, if required, the referral and advertising requirements of my application.

IMPORTANT NOTICES

- Once you click 'Next' the application will be locked down and you will NOT be able to edit it any more.

DECLARATION

☒ By submitting this application form, I, declare that the information contained on this form is complete and accurate.

OFFICE

Office to submit application to: Kamloops

PROJECT INFORMATION

Is this application for an activity or project which requires more than one natural resource authorization from the Province of BC? No

OFFICE USE ONLY		
Office Kamloops	File Number	Project Number
	Disposition ID	Client Number

New Prosperity Description of Work Program

DESCRIPTION OF SITE INVESTIGATION ACTIVITIES

The proposed site investigation (SI) program at the New Prosperity Project is comprised of test pits, drillholes, monitoring wells, pumping wells and geophysical investigations (resistivity profiling, induced polarization (IP) and seismic refraction. Note that the online NoW application requires selection of access roads, trails, helipads, air strips and boat ramps but there are no air strips or boat ramps proposed in this work program.

A multi-year area based application is being submitted to enable work to extend over a period of 3 years should proposed work not be completed in one season due to weather and/or wildlife window restrictions, or other unforeseen circumstances, to enable further investigation in years 2 and 3 pending results of initial testing, and to provide latitude in adjusting locations of test sites pending both results of initial testing and consultation with Aboriginal groups to avoid sensitive areas.

Test Pits

Test pits will be excavated with a 30-tonne excavator to about 5 m depth or refusal due to bedrock or excessive inflows of water. Each test pit footprint will have an approximately 5 m x 6 m disturbance area. Access to the test pits will be built along temporary access trails approximately 4 m wide to allow one-time use access of a large excavator. The locations have been selected to avoid watercourses, standing water and other environmentally sensitive areas. The locations of test pits may need to be modified for access reasons. The test pits will be backfilled and the surface smoothed with an excavator bucket to match the previous terrain. The topsoil will be salvaged and used to reclaim the test pits after backfilling.

Drill holes, Monitoring Wells and Pumping Wells

Each drill hole, monitoring well and pumping well footprint will have a 20 m x 25 m disturbance area. Access to the drill hole, monitoring wells and pump wells along temporary access trails will be approximately 6 m wide to allow regular access for a drill rig and support vehicles. The locations have been selected to avoid watercourses, standing water and other environmentally sensitive areas. Provisions shall be made at each drill site for sediment control from any re-circulating water. Upon completion, drill holes will be sealed and backfilled to the ground surface, or a monitoring well, pump well or vibrating wire piezometer will be installed for long-term monitoring of groundwater and hydraulic conductivity testing.

The application identifies potential water sources for cooling water for drilling. The actual water source for each drill hole will be dependent on season water flows, and sequence of drilling activities.

Geophysical Investigations

Geophysical investigations, including resistivity profiling, induced polarization (IP) and seismic refraction investigations are completed using a variety of techniques. Seismic refraction includes the use of 100 m long cables with sensors (geophones) that are pushed into the ground approximately every 5 m to measure the ground response and a vibration is set off at various locations along the line. The vibration is caused by a small seismic charge fired at different locations along the line and results in a small hole, approximately 300 mm deep at each location (approximately every 20 m along the survey line). The holes are small and will be infilled by hand where necessary to prevent any safety risk.

Resistivity surveys involve inserting metal electrodes into the ground at the required separation along the geophysical lines. Intelligent nodes are then connected to the electrodes and a voltage is measured across each electrode.

Access will be cleared to allow the geophysical survey crew to walk along each of the investigation lines; equivalent to narrow hiking trails. Clearing will involve clearing brush and fallen trees only, no standing trees will be felled.

Roads and Trails

Clearing and land disturbance will be minimized by utilizing existing ATV trails through open landscapes, and existing exploration trails that were previously cleared then reclaimed through forests. Taseko intends to use existing forestry roads to obtain access to exploration sites from the 4500 Road. Prior to use of these roads, Taseko will enter in to a road use agreement (or equivalent) with Tolko or the Ministry of Forests Lands and Natural Resource Operations. For reasons of avoidance of steep switchbacks near the junction with the Beece Creek Road and cutslope ravelling which deposits gravel and large debris on the road grade, the 4500 road will be used as the main access to the exploration area. However, access via the Beece Creek Road for some elements of the program should not be discounted. All trail development contemplated under this program will be subject to field fitting in accordance with applicable Forestry and Environmental guidelines.

Camp

A base camp has been included in the application. Figure 4 shows two potential locations for the camp and water sources for each. Both are in areas that require no clearing. The final camp location selection will be informed by detailed program planning and any First Nations comments. The Ministry will be notified of the final camp location and provided with a map at least 10 days before the commencement of work.

TIMING AND EXTENT OF SITE INVESTIGATION ACTIVITIES

The SI program proposed for the NoW application has been divided into nine distinct areas as shown on Figure 4:

1. Tailings Storage Facility (TSF) Main and West Embankment Footprint
2. TSF South Embankment Footprint
3. TSF Basin
4. Downstream of TSF
5. Open Pit Area
6. Area Between Open Pit and Fish Lake
7. NAG Stockpile
8. ORE Stockpile, and
9. Onion Lake Area

Work proposed for year 1 is limited to areas 1 through 8 as itemized in Table 1 and work locations are detailed on Figure 4. Note that actual locations of drill holes, test pits, and/or new access trails may vary slightly subject to field conditions at the time to minimize environmental effects, and to avoid environmentally or culturally sensitive areas, including those already known to Taseko as well as any other new features that may be identified through ongoing engagement with Aboriginal groups.

Table 1 identifies the distinct SI areas, the number of each type of investigation, the length of geophysical investigations, and access trail lengths. Note that existing access trails includes only those that have been previously reclaimed and require modifications.

Table 1 Summary of Proposed 2017 NoW Site Investigations

Area	Test Pits	Drillholes	Monitoring Wells	Pumping Wells	Geophysical Investigations (km)	Drillhole Trails		Test Pit Trails	
						(Existing) (km)	(New) (km)	(Existing) (km)	(New) (km)
TSF Main and West Embankments	57	21	7	3	1.4	7.5	-	0.4	2.7
TSF South Embankment	45	14	4	3	-	3.0	0.2	0.3	2.6
TSF Basin	145	13	1	-	9.9	9.5	0.4	3.2	23.7
Downstream of TSF	18	6	-	-	3.7	-	2.5	-	4.1
Open Pit Area	6	10	-	-	-	-	-	-	-
Area between Open Pit and Fish Lake	15	6	3	2	-	0.2	0.2	-	0.8
NAG Stockpile	10	2	-	-	-	0.1	0.0	-	0.8
Ore Stockpile	21	4	3	-	-	3.4	1.0	-	1.8
Total	317	76	18	8	15	23.7	4.3	3.9	36.5

Work proposed for year 1 includes all work identified as follows.

Areas 1 & 2 – TSF Embankment Footprints (Main, South and West Embankments)

102 test pits, thirty-five drill holes, eleven monitoring wells, six pumping wells and 1.4 km of geophysical investigations (resistivity profiling, induced polarization (IP) and seismic refraction) are proposed in the Main, South and West embankment footprints. Drill holes and test pits will confirm embankment foundation conditions, surficial material engineering properties, basal till extent and hydraulic conductivity properties of surficial materials and underlying bedrock. Spacing for site investigation locations along a dam axis are based on the expected variability and range from a few meters apart for complex conditions (such as in the area of the mapped meltwater channels) to 100 m for less complex conditions. Drill hole depths will be at least equivalent to the maximum dam height, or a depth sufficient to confirm competent strata.

Monitoring wells will be installed downstream of the three embankments to carry out sufficient pumping tests in the upper basalt unit to determine its hydraulic properties and evaluate the pumping capacity and drawdown relationships. The monitoring wells will test large-scale characterization of hydraulic conductivity and bedrock structures downstream from the TSF. Pump wells will test unconsolidated deposits and bedrock hydraulic conductivity and be used to conduct drawdown tests.

Two drill holes from this area will be chosen to be drilled deeper so they can be used for the condemnation investigation program.

Geophysical investigations will confirm basin overburden thickness, glaciofluvial material thickness, and bedrock surface profiles, particularly within the mapped meltwater channel zones that line up with the main stem creek and Tributary 1.

Area 3 – TSF Basin

145 test pits, thirteen drill holes, a monitoring well and 9.9 km of geophysical investigations are proposed in the TSF Basin area. A detailed drilling and test pit program will be conducted in the area of the TSF basin to determine the detailed hydrogeology and to accurately plan the till augmentation program. Drill holes will confirm subsurface geotechnical conditions and depth to basal till. Hydraulic conductivity of surficial materials such as glacial till, kame, esker, and glaciofluvial deposits will be tested to assist with seepage analysis and design considerations. Test pits will characterize overburden thickness, surficial material types, and engineering properties for the basin liner.

Monitoring wells will test large-scale characterization of hydraulic conductivity and bedrock structures within the TSF basin. Geophysical investigations will confirm basin overburden thickness, glaciofluvial material thickness, and bedrock surface profiles, particularly within the mapped meltwater channel zones that line up with the main stem creek and Tributary 1.

Area 4 – Downstream of TSF

Eighteen test pits, six drill holes and 3.7 km of geophysical investigations are proposed downstream of the Main TSF embankment following two mapped meltwater channels. Drill holes will confirm subsurface conditions, the thickness of meltwater channels glaciofluvial deposits and hydraulic conductivity properties. Test pits will characterize overburden thickness, surficial material types, and engineering properties for the water management ponds. Information collected will be used to understand the surface water and groundwater interactions within these areas and allow for optimization of seepage collection measures downstream of the Main Embankment.

Geophysical investigations will confirm basin overburden thickness, glaciofluvial material thickness, and bedrock surface profiles, particularly within the mapped meltwater channel zones that line up with the main stem creek and Tributary 1.

Area 5 – Open Pit Area

Six test pits and ten drill holes are proposed in the Open Pit area. Rock samples collected from drill holes will be used to refine estimates of waste rock types and quantities during the pre-stripping and initial five years of mine operations. Test pits will characterize overburden thickness, surficial material types, and engineering properties for the construction and operational sediment control ponds.

Area 6 – Area between Open Pit and Fish Lake

Fifteen test pits, six drill holes, three monitoring wells and two pumping wells are proposed in the area between the Open Pit and Fish Lake. This work will further investigate the hydrogeological conditions between Fish Lake and the proposed open pit, including long duration pump tests to fully investigate the groundwater conditions. Vertical drill holes, monitoring wells and pumping wells will confirm vertical hydraulic conductivity of the bedrock. Angled drill holes will investigate bedrock structure QD and East Fault and characterize local scale hydraulic conductivity between the open pit and Fish Lake. Test pits will characterize overburden thickness, surficial material types, and engineering properties for the Fish Lake outlet dams. Pumping wells will test bedrock hydraulic conductivity and be used to conduct drawdown tests. Monitoring wells will be used to observe and monitor drawdown during pump tests.

Area 7 – NAG Stockpile

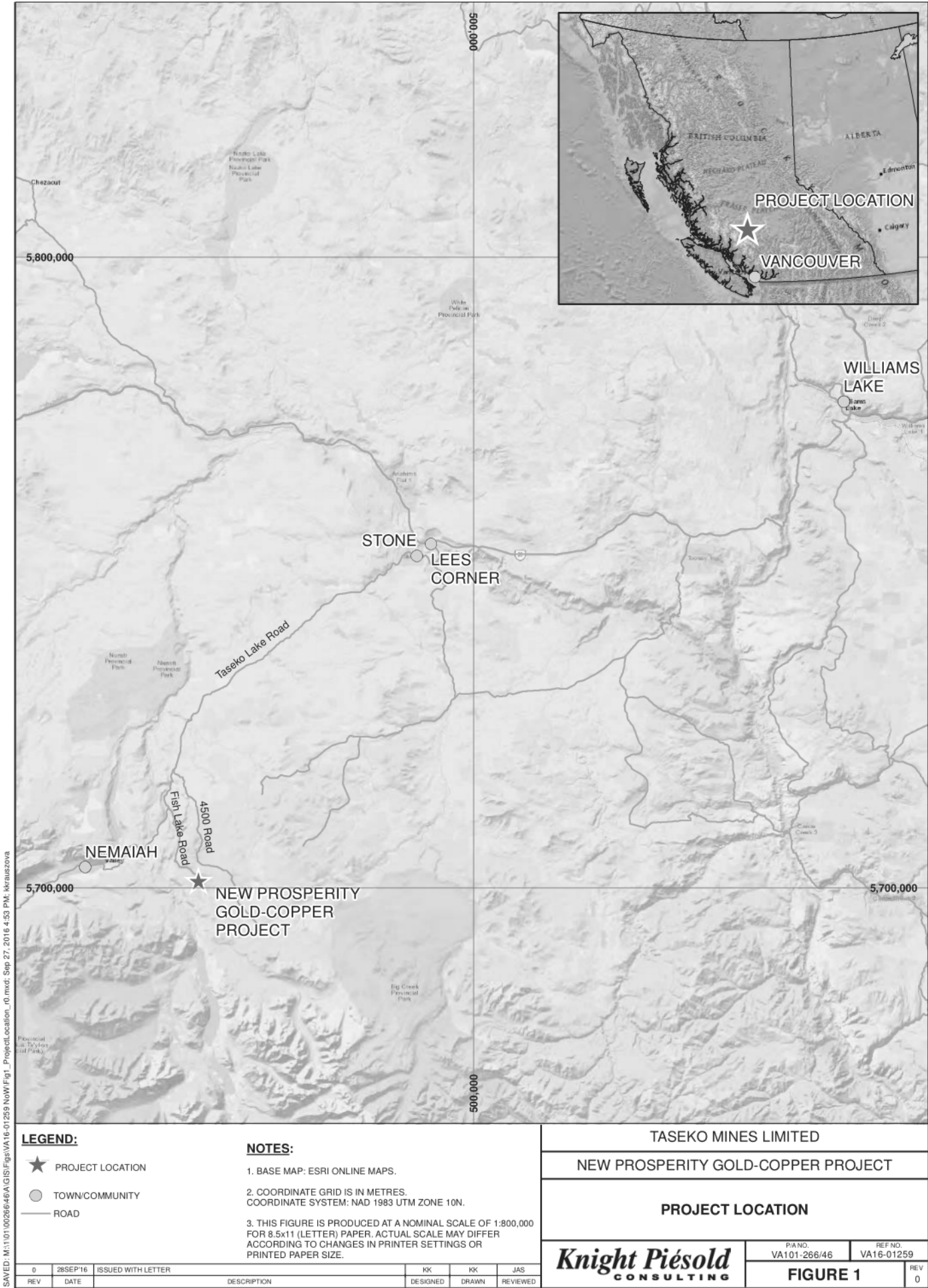
Ten test pits and two drill holes are proposed in the area of the NAG Stockpile. Drill holes will confirm geotechnical foundation conditions and hydraulic conductivity of surficial materials and bedrock. Test pits will characterize overburden thickness, surficial material types, and engineering properties for stockpile foundation conditions.

Area 8 – Ore Stockpile

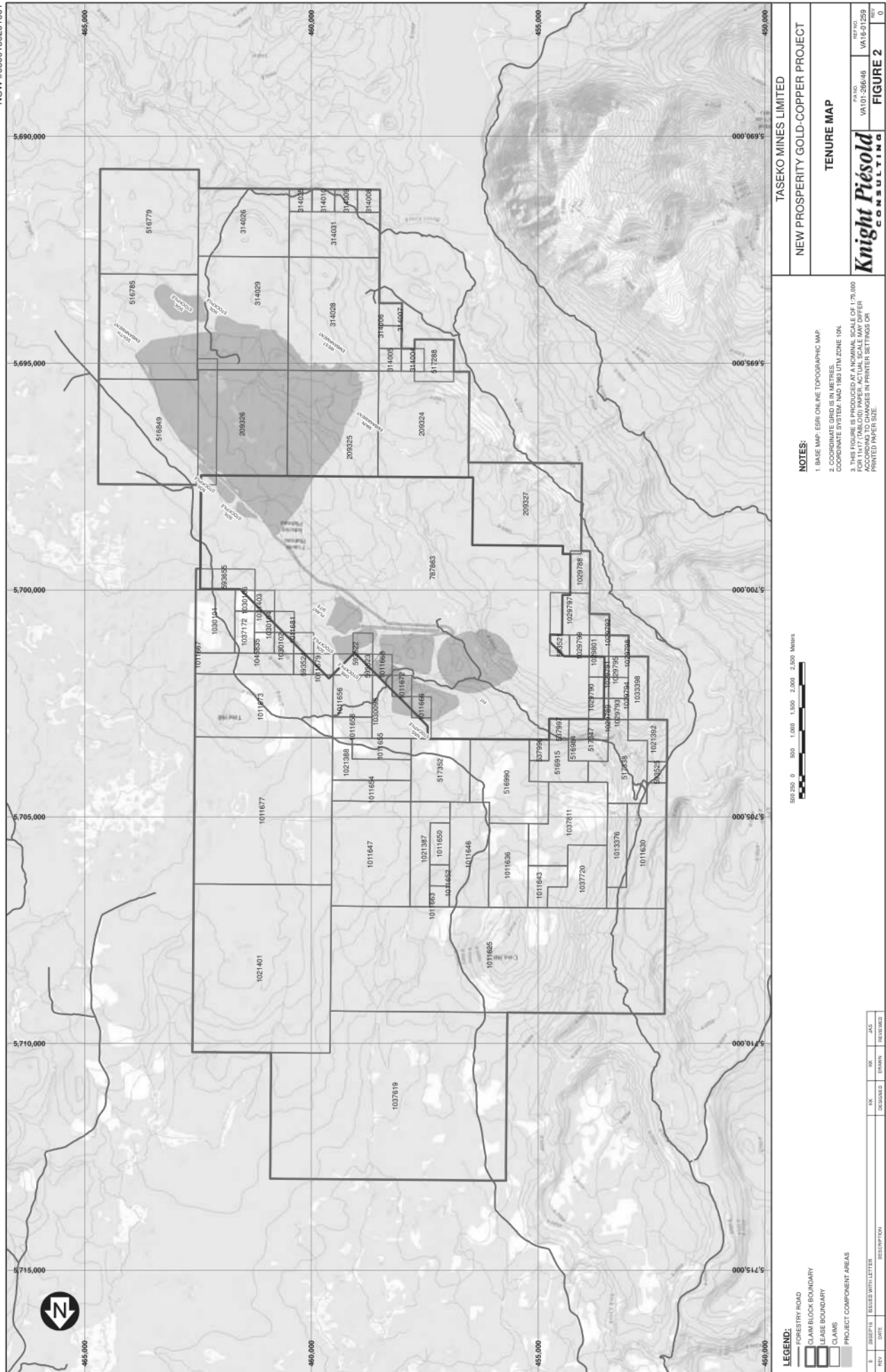
Twenty-one test pits, four drillholes, and three monitoring wells are proposed in the area of the Ore Stockpile. Drill holes will confirm geotechnical foundation conditions and hydraulic conductivity of surficial materials and bedrock. Test pits will characterize overburden thickness, surficial material types, and engineering properties for stockpile foundation conditions.

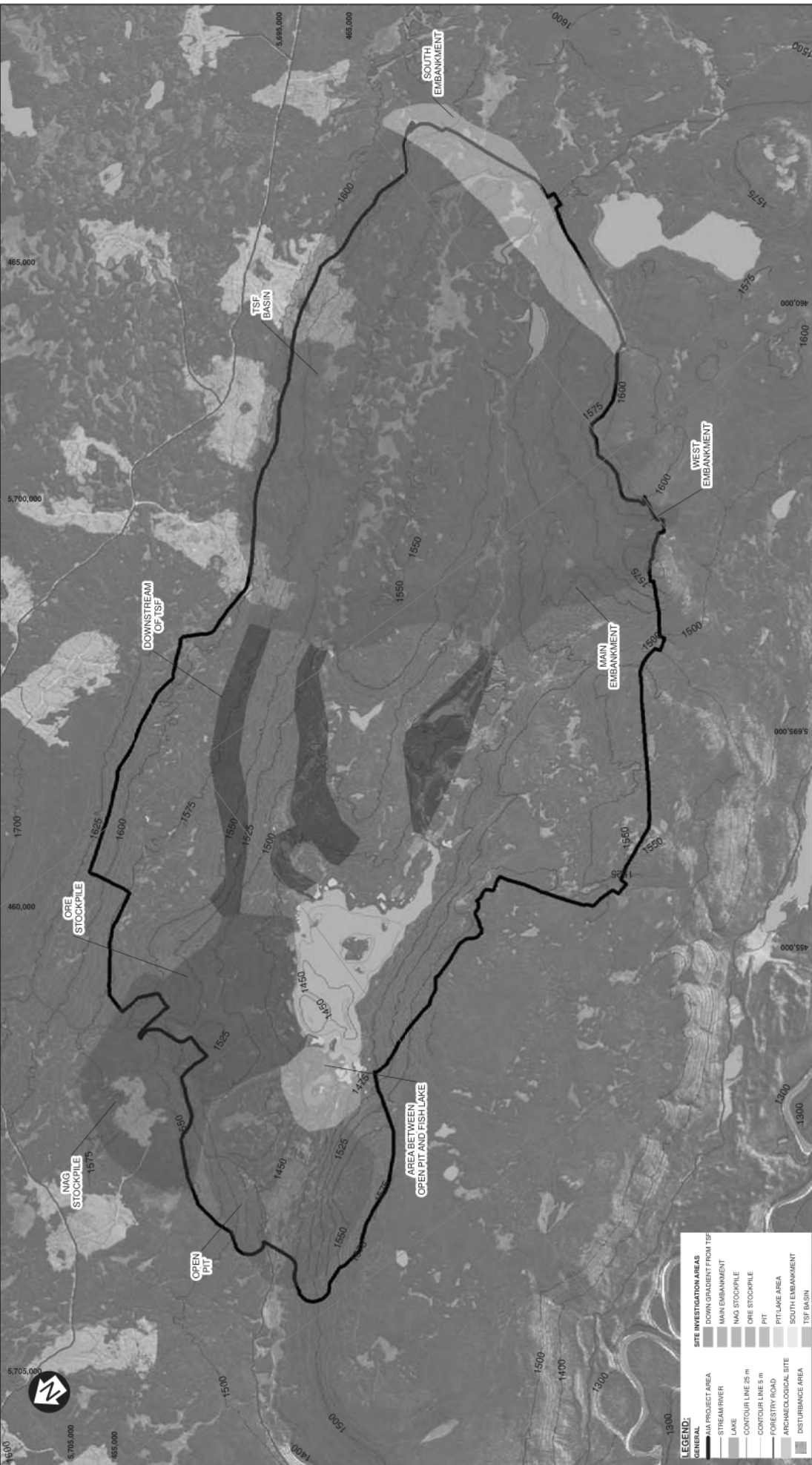
Figure 5 identifies the area over which work may be conducted in a 3 year time frame.

Additional subsequent work that may be required in addition to that identified for year 1 is expected to be limited to fifty test pits, ten drill holes, eight monitoring wells, two pumping wells and 5 km of geophysical investigations.



SAVED: M:\1010026646\GIS\Figs\VA16-01259 Now Fig1 - Project Location_10.mxd; Sep 27, 2016 4:53 PM; kkrasova





LEGEND:

GENERAL

- PROJECT AREA
- STREAM/RIVER
- LAKE
- CONTOUR LINE 25 m
- CONTOUR LINE 5 m
- FORESTRY ROAD
- ARCHAEOLOGICAL SITE
- DISTURBANCE AREA

SITE INVESTIGATION AREAS

- DOWN GRADIENT FROM TOP
- MAIN EMBANKMENT
- NAO STOCKPILE
- ORE STOCKPILE
- PIT
- PIT LAKE AREA
- SOUTH EMBANKMENT
- TSMF BASIN



- NOTES:**
1. BASE MAP: ESR ONLINE IMAGERY
 2. COORDINATE GRID IS IN METRES, COORDINATE SYSTEM: UTM 18Q UTM ZONE 18Q
 3. THIS FIGURE IS PRODUCED AT A NOMINAL SCALE OF 1:25,000 FOR INFORMATION PURPOSES ONLY. IT IS NOT TO BE USED FOR DESIGN OR CONSTRUCTION PURPOSES. ANY CHANGES TO THE PROJECT AREA WILL BE REFLECTED IN THE NEXT EDITION OF THE FIGURE.
 4. 20M TRM CONTOURS ARE DISPLAYED OUTSIDE OF THE PROJECT AREA, 5 METER UTM CONTOURS ARE USED WITHIN THE PROJECT AREA.

TASEKO MINES LIMITED

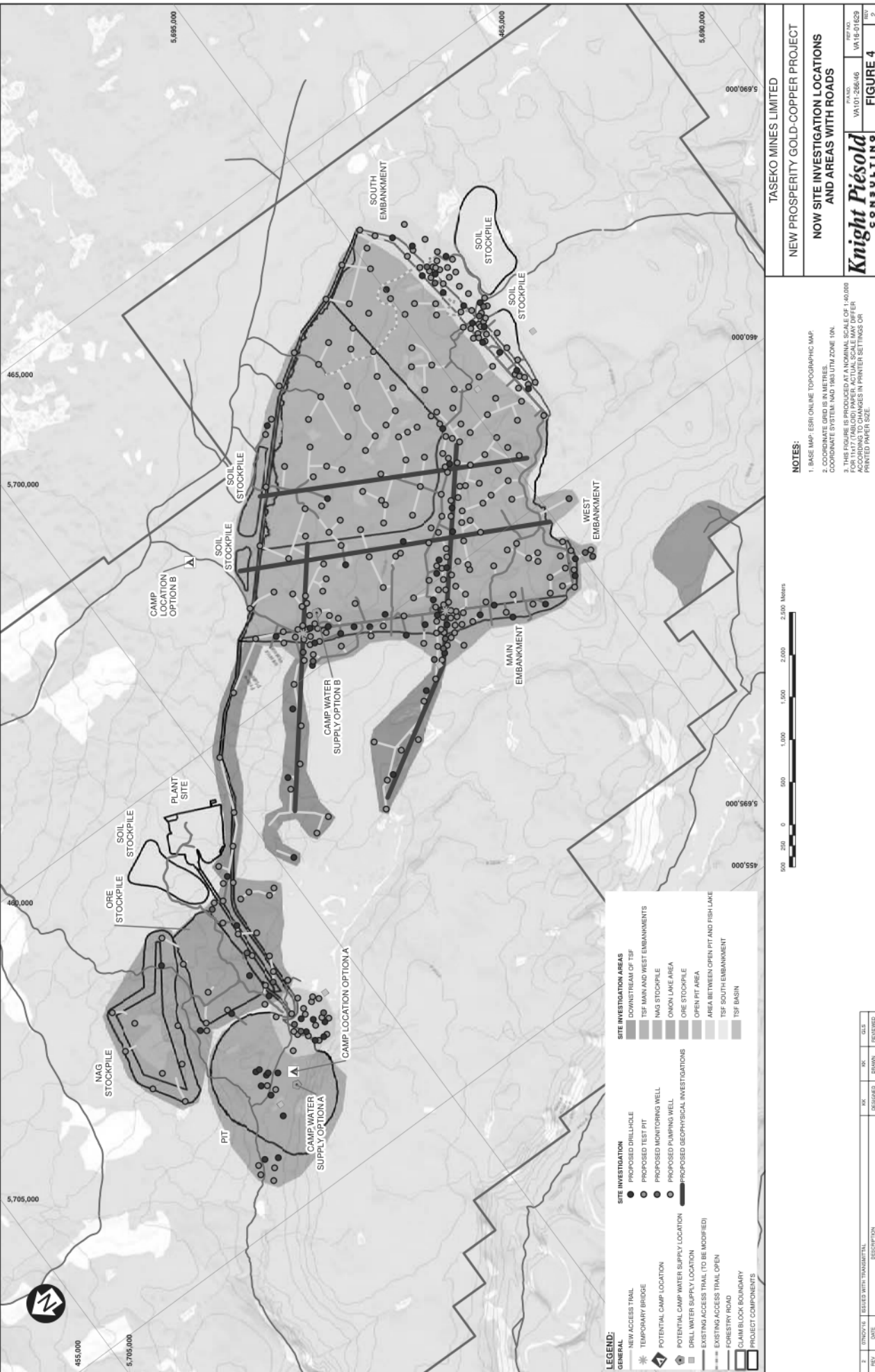
NEW PROSPERITY GOLD-COPPER PROJECT

**PROPOSED WORK AREA,
TOPOGRAPHY, EXISTING DISTURBANCE
AND ARCHAEOLOGICAL SITES**

Knight Piésold
CONSULTING

PROJECT NO: VA101-28648
REPORT NO: VA18-01259
FIGURE 3

REV	DATE	ISSUED WITH LETTER	DESCRIPTION	BY	CHK	DATE	REV	DATE	DESCRIPTION





LEGEND:

- FORESTY ROAD
- CLAIM BLOCK BOUNDARY
- WORK AREAS
- PROJECT COMPONENTS

NOTES:

1. BASE MAP: ESRI ONLINE TOPOGRAPHIC MAP
2. COORDINATE GRID IS IN METRES.
3. THIS FIGURE IS PRODUCED AT A NOMINAL SCALE OF 1:40,000 FOR 11x17 (7x10) PAPER. ACTUAL SCALE MAY DIFFER BASED ON THE SIZE OF THE PAGES IN PRINTED SETTINGS OR PRINTED PAPER SIZE.

TASEKO MINES LIMITED

NEW PROSPERITY GOLD-COPPER PROJECT

MULTI-YEAR AREA-BASED WORK AREAS

Knight Piesold CONSULTING

FIG NO: VA101-28646
REV: 01
DATE: 16-01-2011
FIGURE 5



Ministry of
Energy and Mines

July 14, 2017

File: 14675-20/0300150

Katherine Gizikoff
Taseko Mines Ltd.
15th Floor-1040 Georgia Street W
Vancouver BC V6E 4H1

Dear Katherine Gizikoff:

**Re: Amended Permit MX-3-131
Approval # 17-0300150-0714
Property New Prosperity**

You are hereby authorized to carry out exploration activities as detailed in the Notice of Work and Reclamation Program submitted October 17, 2016 and revised on November 07, 2016, under the above-noted permit. Your permit is amended to include the New Prosperity Property with a reclamation liability of \$180,500. The amended permit is enclosed, and you are reminded that you may not depart from the permitted program without written authorization.

Please ensure that you and all persons who are carrying out activities in accordance with this permit comply with all terms and conditions of the permit and are familiar with the permitted work program.

This permit applies only to the requirements under the *Mines Act* and Health, Safety and Reclamation Code for Mines in British Columbia (Code). Other legislation may be applicable to the operation and you (the Permittee) may be required to obtain approvals or permits under that legislation.

The Water Sustainability Act came into force on February 29, 2016. Mining activities, where water is diverted from streams and underground aquifers, are now regulated. On April 15th 2016 several exemptions were approved for 2016 and these exemptions have now been extended to December 31, 2017. Where necessary you should apply for a short term licence or water extraction permit for your mining activities. Application can be made online through Front Counter BC.

The BC Wildfire Service requests that all persons carrying out an industrial activity scheduled to occur within 300 metres of forest or grass land between March 1st and November 1st of each year submit a completed Emergency Contact Information Form (FS104) to the appropriate fire centre by March 31 each year. The FS104 form can be accessed here: <https://www.for.gov.bc.ca/isb/forms/lib/FS1404.pdf>

Please provide me with written notice at least 10 days prior to starting work and at least 7 days prior to ceasing work on the program.

The Annual Summary of Exploration Activities and the Multi-Year, Area Based Work Program Annual Update can be found at <http://www2.gov.bc.ca/gov/content/industry/mineral-exploration-mining/permitting/annual-reporting-forms>. Until this permit is closed, you must file this information by March 31 of each year.

Sincerely,

A handwritten signature in black ink, appearing to read "Rick Adams", is positioned above the typed name.

Rick Adams
Senior Inspector of Mines - Permitting

Encl. NOW/Permit

cc: Reclamation Section, Victoria

**Appendix 1 –
Delegation of Chief Inspector’s Authority
Under the Mines Act – Section 10**

Delegation of Chief Inspector's Authority Under the Mines Act – Section 10

Coal and Mineral Exploration

Permitting level	2	4	6	8
Surface coal and mineral exploration issues resolved through referral and consultation process.	√	√	√	√
Surface coal and mineral exploration issues unresolved through referral and consultation process.			√	√
Underground coal and mineral exploration: <ul style="list-style-type: none"> Requires sign off by H&S Inspector. Requires referral to ARD specialist. Requires sign off by underground (experienced Inspector). For coal (underground Certified Inspector). 			√	√
Exploration on or immediately adjacent to permitted major mines, as an amendment to the major mine permit.		√	√	√
Mineral bulk sample <10,000 tonnes total, i.e. ore + waste, all issues resolved during referral process. For underground: <ul style="list-style-type: none"> Requires sign off by H&S Inspector. Possible sign off by ARD specialist. 			√	√

√ indicates approval is delegated

Delegation of Chief Inspector's Authority Under the Mines Act – Section 10

Coal and Mineral Exploration

Permitting level	2	4	6	8
Coal surface bulk sample <50,000 tonnes total, i.e. ore + waste, all issues resolved during referral process: <ul style="list-style-type: none"> requires sign off by Reclamation. 			√	√
Coal surface bulk sample >50,000 tonnes total, i.e. ore + waste, or issues unresolved during referral process: <ul style="list-style-type: none"> requires sign off by Reclamation and ARD. 			√	√
Coal underground bulk sample: <ul style="list-style-type: none"> requires sign off by H&S Inspector. requires referral to Reclamation and ARD. requires sign off by underground coal Certified Inspector. 				√

√ indicates approval is delegated

Delegation of Chief Inspector's Authority Under the Mines Act – Section 10

Mineral Concentrators & Coal Prep. Plants

Permitting level	2	4	6	8
Any production processed through a pilot plant, custom mill or an on-site mill: <ul style="list-style-type: none"> • sign off by H&S Inspector. • requires sign off by Geotechnical Engineering. • requires sign off by ARD and Reclamation specialist. • sign off by Senior Geotech. if tailings facility. 			√	√

Placer Mining

Permitting level	2	4	6	8
Placer <EA threshold	Mineral Resource Officer	√	√	√
Underground placer: <ul style="list-style-type: none"> • requires sign off by H&S Inspector. • requires sign-off by underground (experienced Inspector). 			√	√
Placer >EA Threshold.				√

√ indicates approval is delegated

Sand, Aggregate Pits & Quarries Pits & Construction Material Quarries

Permitting level	2	4	6	8
Annual production <100,000 tonnes, and no complex social issues.		√	√	√
Annual production <250,000 tonnes, or with complex social issues.			√	√

√ indicates approval is delegated

Delegation of Chief Inspector's Authority Under the Mines Act – Section 10

Small Mineral Mines

Permitting level	2	4	6	8
Annual production <75,000 tonnes, and no complex social issues: <ul style="list-style-type: none"> • Requires sign off by Geotechnical Engineering. • Requires sign off by ARD and Reclamation specialist. • Requires referral to H&S Inspector. 			√	√
Annual production >75,000 tonnes, or with complex social issues: <ul style="list-style-type: none"> • Does not trigger EAA. • Requires sign off by Geotechnical Engineering. • Requires sign off by ARD and Reclamation specialist. • Requires sign off by H&S Inspector. 				√

Large Producing Mines

Permitting level	2	4	6	8
EAA thresholds met or exceeded producing mines.				√

√ indicates approval is delegated

Appendix 2 - Partial Summary of Documents I Have Considered in Making My Decision

I have considered a range of relevant information sources prior to proceeding to a decision. Information I have reviewed includes, but is not limited to, the following:

- Initial Impact Assessment (December 6, 2016), MFLNRO First Nations Relations staff
- Response from TNG to the Engagement request, January 24, 2017 (44 pages)
- Letter from Chief Ross-Myers to the Premier and Ministers, January 23, 2017 (3 pages)
- CEAR #1146 Submission to the Panel of Closing Remarks from Tsilhqot'in National Government (151 pages) <http://ceaa-acee.gc.ca/050/documents/p63928/93669E.pdf>
- CEAR#264, Letter of Comment to the Canadian Environmental Assessment Agency from Cindy Ehrhard-English concerning the Environmental Impact Statement (EIS) (see Reference Document Number 129) (12 pages) <http://ceaa-acee.gc.ca/050/documents/p63928/83459E.pdf>
- CEAR#1151, Submission to the Panel of Closing Remarks from Taseko Mines Limited (Received August 23, 2013) (46 pages) <http://ceaa-acee.gc.ca/050/documents/p63928/93676E.pdf>
- CEAR #716 Written hearing submission filed by Dr. Jonaki Bhattacharyya (15 pages) <http://ceaa-acee.gc.ca/050/documents/p63928/91955E.pdf>
- CEAR #76, Environmental Impact Statement (final version), volume 8 – First Nations (150 pages) http://ceaa-acee.gc.ca/050/documents_staticpost/44811/32276/v8d000.pdf
- TNG Response to the New Prosperity Panel Report (January 9, 2014) (63 pages)
- Letter, JP Laplante to Minister Polak and Doug Caul (January 21, 2014) (33 pages)
- Affidavit #1 of Sonny Lulua (4 pages) (BC Supreme court 114556)
- Affidavit #1 of Alice Williams (7 pages) (BC Supreme Court 114556)
- Affidavit #1 of Chief Marilyn Baptiste, with Exhibits A-H (213 pages) (BC Supreme Court 114556)
- Affidavit #1 of Chief Marilyn Baptiste, with Exhibits I-P (111 pages) (BC Supreme Court 114556)
- Letter, TML – EAO re Amendment Application (July 29, 2016) (6 pages)
- November 8, 2013 – Letter from Taseko Mines Limited to the Honourable Leona Aglukkaq re: New Prosperity Gold-Copper Project (15 pages)
- Federal Court Order (June 20, 2014), suspending further steps (1 page) (Federal Court T-744-14)
- Federal Court Order (July 29, 2014), vacating hearing dates (4 pages) (Federal Court T-1977-13)
- Federal Court Order & Reasons, dismissing TML conversion application (18 pages) (Federal Court T-1977-13)
- Federal Court Order (Sept. 9, 2016), setting hearing dates (5 pages) (Federal Court T-744-14)
- S. Senger, Cover Letter, Road Density Review for the Tete Angela Landscape Unit (1 page)
- S. Senger, Road Density Review for the Tete Angela Landscape Unit 20-January-2017 (11 pages)

- CEAR #714, Tsilhqot'in Current Use of Nabas Lands and Resources for Traditional Purposes: Overview and Assessment of Impacts of the Proposed New Prosperity Mine (74 pages)
- CEAR #1091, Exhibit - 126: Linda Smith presentation on August 21, 2013 at the Stswecem'c Xgat'tem, Dog Creek Reserve Community Hearing Session (26 pages)
- CEAR #956, Hearing Transcript Volume 15: August 13, 2013 Yunesit'in Reserve Community Session (239 pages)
- CEAR #939, Hearing Transcript Volume 14: August 12, 2013 Tsi Deldel, Alexis Creek Reserve Chilanko Forks Community Session (212 pages)
- CEAR #997, Hearing Transcript Volume 18: August 16, 2013 Tl'etingox-t'in, Anaham Reserve Community Session (209 pages)
- CEAR #1183, Environmental Assessment Decision Statement (1 page)
- CEAR #1184, News Release - Release of Environmental Assessment Decision Statement (1 page)
- CEAR #996, Hearing Transcript Volume 17: August 15, 2013 Tl'esqox, Toosey Reserve Community Session (241 pages)
- CEAR #924, Written Hearing Submission (Overview Maps) received from J.P. Laplante (presented at Tl'esqox, Toosey Reserve Community Session).(12 pages)
- See CEAR #1080, Identification and Management of Moose Winter Habitat in the Cariboo Region: Literature Review and Mapping Pilot Study (British Columbia Ministry of Environment, March 2006) (54 pages);
- CEAR # 1081, Re-evaluation of Trends in Moose Populations in the Cariboo Region 1985-2012 (Wildlife Infometrics Inc, July 2013); (86 pages)
- CEAR #1082, Preliminary List of "High Value" Wetlands for Moose Within the Cariboo Forest Region (Ministry of Water, Land, and Air Protection, March 2004) (32 pages);
- CEAR #1083, Big Creek (MU 5-04) 2012 Winter Moose Inventory (Ministry of Forests, Lands and Natural Resource Operations, Mar 2012) (23 pages);
- CEAR #1084, 2012 Anahim East (MU 5-12) Winter Moose Survey (Ministry of Forests, Lands and Natural Resource Operations, Mar 2012) (28 pages);
- CEAR #1069, Winter Habitat Selection and Use by Moose in the West-Chilcotin Region of British Columbia (Bruce Gary Baker, July 1990) (111 pages);
- CEAR #646, Written Hearing Submission filed by the British Columbia Ministry of Forests, Lands and Natural Resource Operations (Received July 19, 2013) (136 pages)
- [Previous] CEAR #76, Environmental Impact Statement, Appendix 8-2-B (Ehrhart-English Report). (121 pages)
- [Previous] CEAR #1991, Hearing transcripts Volume 13: March 31, 2010 Daytime Community Session (379 pages)
- Report of the Federal Review Panel established by the Minister Of The Environment[:] Taseko Mines Limited's Prosperity Gold-Copper Mine Project (July 2, 2010) ([here](#)) (296 pages)
- CEAR #1178, Report of the Federal Review Panel - New Prosperity Gold-Copper Mine Project (Oct. 31, 2013) ([here](#)) (323 pages)
- CEAR #1183, Environmental Assessment Decision Statement (1 page)

- **CEAR #1184, News Release - Release of Environmental Assessment Decision Statement (1 page)**
- R. Holmes, Fish Lake Exploration Update (11 pages)
- 30 photos taken by Xenii Gwet'in member Alice Williams who was an Environmental/Cultural Monitor during the 2012 reduced NoW. 32 photos total
- February 3, 2017 Impact statements from Elders Norman William, Sonny Lulua and Orry Hance
- February 3, 2017 Photos to supplement Elders' statements above
- February 3, 2017 February 2, 2017 letter from Chief Roger William to Premier Clark
- February 3, 2017 Additional photos of Tsilhqot'in members conducts traditional practices to support Sonny Lulua's statement, email 1 of 3
- February 3, 2017 Additional photos of Tsilhqot'in members conducts traditional practices to support Sonny Lulua's statement, email 2 of 3
- February 3, 2017 Additional photos of Tsilhqot'in members conducts traditional practices to support Sonny Lulua's statement, email 3 of 3
- February 17, 2017 Clarification of 2 items submitted on January 24, 2017 – information and maps on moose decline and corrections regarding photos
- March 3, 2017 letters from BC EAO Shelley Murphy to Chief Joe Alphonse, TNG, and Russell Hallbauer, TML, regarding BC EAO's proposed procedures for review of TML's application to amend their Environmental Assessment Certificate
- Revised Impact Assessment (March 13, 2017), MFLNRO First Nations Relations staff
- TNG Response to the Revised Impact Assessment (April 18, 2017) including:
 - 2017 04 18 JPL – EWL Comments on Revised IA.pdf
 - 2017 04 18 Encl #1 - JB-JP memo on Mature Forests in Nabas-Teztan Biny Region.pdf
 - 2017 04 18 Encl #2 - Panel Information Request #3.pdf
 - 2017 04 28 Encl #3 - TML Response to IR #3.pdf
 - 2017 04 28 Encl #4 - TNG Letter to Panel.pdf
 - 2017 04 28 Encl #5 - Panel's Second Deficiency Statement.pdf
- Response to TNG April 18, 2017 letter (May 23, 2017), MFLNRO First Nations Relations staff
- Response to MFLNRO First Nations Relations staff May 23, 2017 letter (June 6, 2017), TNG
- Letter to MFLNRO First Nations Relations staff (June 16, 2017), TNG
- March 28, 2017 and May 12, 2017 TNG/MEM/MFLNRO notes from meetings where Loretta Williams, JP LaPlante, and Jay Nelson described the cultural significance and importance of the Teztan Biny (Fish Lake), Yanah Biny (Little Fish lake) and Nabas area to the Tsilhqot'in people, and Tsilhqot'in concerns regarding the Notice of Work application, and the broader Prosperity/New Prosperity major mine project
- Correspondence between TML and TNG regarding the Application and prior to submission of the Application (July 29, 2016 through October 13, 2016)
- Correspondence from TML in response to submissions by the TNG, and correspondence from TNG in response to submissions by TML during the consultation period (November 22, 2016 to date of decision)

- Previous Notice of Work applications, descriptions and extent of planned work programs, annual notices of completion of work and summaries of reclamation activities, First Nations consultation responses, and other related correspondence on MEM mine files for this project (September 7, 1979 to date of decision)
- Forest cover including ages and species of trees, and natural openings; natural stand disturbance history including insect infestations and wildfires; disturbance patterns and protected areas; in the Application area, at the landscape level, and in relation to the disturbance proposed in the Application
- Reasons for decision of BC Supreme Court, BC Court of Appeal, and Supreme Court of Canada regarding *Tsilhqot'in Nation v. British Columbia*
- Tsilhqot'in Stewardship Agreement (amended March 31, 2017)
- Nenqay Deni Accord (February 11, 2016)
- Documents on the Federal CEAA site regarding Prosperity and New Prosperity
- Documents on the BC EAO website regarding Prosperity and New Prosperity
- *Taseko Mines Limited v. Phillips*, 2011 BCSC 1675
- Hoffos, R (May 11, 2017) *New Prosperity Mine Notice of Work: A Review of Potential Wildlife Impacts to Selected Species*. Williams Lake, BC: Ministry of Forests, Lands and Natural Resource Operations
- Williston, C (November 2016). *Tete Angela Landscape Unit Cumulative Effects (CE) Assessment*. Williams Lake, BC: Ministry of Forests, Lands and Natural Resource Operations
- Hoffos, R (October 20, 2010). *Prosperity Mine: Impact Assessment Framework for Wildlife*. Williams Lake, BC: Ministry of Forests, Lands and Natural Resource Operations
- Documents regarding 1993 Chilko Lake Study Report, Dasiqox Tribal Park, Parks and Protected Areas, and Cariboo Chilcotin Land Use Plan
- Response by Ministers Steve Thomson and John Rustad to January 23, 2017 letter of Chief Myers-Ross
- June 2, 2017 letter from Chief Joe Alphonse and Chief Roger William to Premier Christy Clark, John Horgan and Andrew Weaver
- First Nations Consultation Summary (May 31, 2017) prepared by MFLNRO First Nations Relations staff
- Full First Nations Consultation Record prepared by MFLNRO First Nations Relations staff
- Submissions from Friends of Fish Lake (February 1, 2017 through March 19, 2017)
- *Updated Procedures For Meeting Legal Obligations When Consulting First Nations, Interim, Province of British Columbia, 07 May 2010*

The preceding is only a partial listing of the documents I have reviewed and considered in making my decision.



Archaeological Management for Exploration

Taseko Mines Limited

DOCUMENT #	
Revision	Published
0	2017-06-06

June 2017

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1.0 Purpose

The purpose of the Archaeological Management Plan for Exploration is to ensure the protection of known and unknown heritage sites and objects, as defined in the BC Heritage Conservation Act, during exploration of the New Prosperity project.

The objectives of the Archaeological Management Plan for Exploration are to:

- Protect known heritage resources through application of the **Archaeological and Heritage Protection Procedure for Exploration** (Appendix 1), and
- Protect newly discovered, or chance find, heritage resources through the implementation of the **Chance Find Protocol for Archaeological Sites New Prosperity Gold-Copper Project near Williams Lake, B.C.** (Appendix 2).

2.0 Existing Environment

An extensive Archaeological Impact Assessment (AIA) was completed by Terra Archaeology over a large part of the area. The AIA conducted was of a comprehensive nature with a total of over 3476 ha being assessed during the field program resulting in the confirmation of 79 protected (pre-1846) archaeological sites. The archaeological resources identified and evaluated, and their map locations, are compiled in the July 2008 confidential document Taseko Mines Ltd. Proposed Prosperity Gold-Copper Mine Located at Fish Lake, British Columbia Archaeological Survey Unit Report held by the BC Ministry of Forests, Lands and Natural Resource Operations. The AIA and archaeological sites are shown on Figure 3 in Appendix B of the NoW submission.

3.0 Management Plan Guidelines

Known archaeological and heritage resources, as identified in the AIA, will be protected through avoidance, supported by awareness training and monitoring, as per the **Archaeological and Heritage Protection Procedure for Exploration** (Appendix 1). The planning of exploration activities will take into consideration the location of known archaeological and heritage resources as defined by Terra Archaeology in the July 2008 *Taseko Mines Ltd. Proposed Prosperity Gold-Copper Mine Located at Fish Lake, British Columbia Archaeological Survey Unit Report*. Exploration activities will be planned to avoid these known sites. Exploration activities in areas that have not yet been assessed for archaeological and heritage resources are strictly prohibited until such time as a Preliminary Field Reconnaissance (PFR) or AIA has been completed.

If by chance an undiscovered archaeological or heritage resource is discovered during exploration, the **Chance Find Protocol for Archaeological Sites New Prosperity Gold-Copper Project near Williams Lake, B.C.** (Appendix 2) will be implemented immediately. The first step in this Protocol is to immediately halt work and all operations within at least 20 m in each direction of the discovery in order to prevent any further disturbance or destruction of the resource. The Environmental Monitor will review this Protocol with all field crew and equipment operators prior to the start of exploration activities, and periodically during the exploration program at safety meetings. This ensures that the process to protect undiscovered archaeological or heritage resources, is clearly understood by all persons exploring on the New Prosperity Project site.

4.0 Monitoring

Monitoring will be conducted daily by the Environmental Monitor, as discussed in the **Archaeological and Heritage Resources Protection Procedure for Exploration**. Monitoring will involve the ongoing protection of known archaeological and heritage resources by ensuring that exploration activities are contained within the defined exploration boundaries and are not impinging on known and delineated archaeological and heritage resources.

5.0 Roles and Responsibilities

The Mine Manager is responsible for:

- Designating an on-site Environmental Monitor during exploration
- Notifying the Archaeology Branch in the event that a chance find archaeology and heritage resource is discovered
- Providing guidance to exploration geologists, engineers and contractors in the avoidance of known archaeological and heritage resources during program planning

The Designated Environmental Monitor is responsible for:

- Those responsibilities as explicitly defined for the Environmental Monitor in the **Archaeological and Heritage Resources Protection Procedure for Exploration**
- Notifying the Mine Manager of a chance find discovery and ensuring that the steps as defined in the **Chance Find Protocol for Archaeological Sites** have been followed

Geologists and Engineering Field Crew, Equipment Operators and Contractors are responsible for:

- Being aware of the location of known archaeological and heritage resources
- Working within the defined exploration boundaries to avoid disturbance or destruction of known archaeological and heritage resources which many not be delineated
- Understanding how to implement the **Chance Find Protocol for Archaeological Sites**

6.0 2017 Site Investigation Program Specific Considerations

- AIA coverage in relation to 2017 NOW exploration sites is identified on Figure 3 in Appendix B.
- Archeological sites within the AIA are identified in pink on the attached map.
- There are short sections of access trail and test sites marginally outside of the AIA coverage area north of Wasp Lake, northwest of Fish Lake, and in Fish Creek area. A PFR will be conducted by a qualified professional on these segments once flagged in the field, and locations adjusted as necessary to ensure avoidance of any high potential sites, prior to site disturbance.

7.0 Appendices

Appendix 1 – Archaeology & Heritage Resources Protection Procedure for Exploration
New Prosperity Gold-Copper Project

Appendix 2 – Chance Find Protocol for Archaeological Sites
New Prosperity Gold-Copper Project

Appendix 3 – Map of AIA and Archaeological Sites
New Prosperity Gold-Copper Project

**Appendix 1 –
Archaeology & Heritage Resources Protection Procedure for Exploration
New Prosperity Gold-Copper Project**



New Prosperity Copper-Gold Project

Archaeological and Heritage Resources Protection Procedure for Exploration

Objective

The objective of the Archaeological and Heritage Resources Protection Procedure for Exploration is to:

- Through avoidance, minimize disturbance to, and protect, known archaeological and heritage sites within the New Prosperity project area as identified during Archaeological Impact Assessment surveys

Other Applicable Plans / Procedures / Policies

- *Chance Find Protocol for Archaeological Sites New Prosperity Gold-Copper Project.*

Pre-Exploration Planning

Working with the Mine Manager, geologists, engineers, equipment operators and other on-site contractors will:

- conduct a site orientation prior to conducting work on site. Refer to maps of known archaeological sites to determine if planned exploration activities are in the area of known archaeological or heritage resources.
- confirm that an archaeological impact assessment (AIA) or preliminary field reconnaissance (PFR) has been conducted in all areas in which exploration activities will occur.
- develop a field map that clearly outlines the areas in which exploration related activities can be conducted. No activities are permitted to occur outside these boundaries.

Pre-Exploration Activities

The designated Environmental Monitor will:

- in the field, locate all known archaeological or heritage resource sites that may be near planned exploration activities.
- clearly delineate sites in the field that are close to exploration activities with a 20 m flagged buffer.
- prior to commencement of work, conduct an in-field review of flagged sites with all field crew personnel and equipment operator(s).
- provide field crew and equipment operators with filed maps delineating exploration boundaries.
- highlight to all crew and equipment operators the importance of not deviating outside the exploration boundaries as defined on the field map.

During Exploration Activities

The Designated Environmental Monitor will:

- perform daily checks on exploration activities to ensure that they are not encroaching upon any flagged buffer zones.
- perform daily checks to ensure that exploration activities are not deviating outside the exploration boundaries as defined on the field map.
- immediately discuss situations of concern with the field crew and/or operator(s), and notify the Mine Manager of any concerns.
- record situations of concern and corrective measures / actions taken, including dates of situation, persons involved, etc. and review with the Mine Manager.
- halt work immediately if an incident has occurred and immediately notify the Mine Manager.

Post-Construction Activities

Once exploration has been completed in the areas of archaeological and heritage resource sites, flagging will be removed so as not to draw attention to the site.

**Appendix 2 –
Chance Find Protocol for Archaeological Sites
New Prosperity Gold-Copper Project**



Chance Find Protocol for Archaeological Sites, New Prosperity Gold-Copper Project near Williams Lake, B.C.

A Chance Find Protocol provides those involved in ground disturbing activities with a framework for identifying archaeological deposits and assists in avoiding unforeseen disturbance to cultural heritage resources. The protocol provides descriptive information regarding cultural materials commonly found in the region and those most likely to be encountered during the course of a specific project. It is recommended that all people involved in ground disturbing activities are familiar with the types of archaeological sites present in the region of development. In the event that archaeological or heritage resources are encountered, you are advised to stop all work in the vicinity of the find and contact a qualified archaeological professional.

What is an archaeological site?

An archaeological site is a location where there is physical evidence of past human activity. Archaeological sites can include things such as stone tools, cultural depressions, remains of prehistoric campsites and culturally modified trees. Archaeological sites represent only one component of a range of heritage resources found throughout the province, including historic buildings, shipwrecks, heritage trails, etc.

Types of archaeological sites with greatest potential to be present in the study area:

Habitation Sites:

Prehistoric habitation sites are most common in locations adjacent to or in the immediate vicinity of bodies of water, most commonly large streams, lakes and rivers but also gullies, creeks and other small drainages. In the Central Interior, this site type is characterized most typically by large circular depressions or house pits. House pit depressions are the archaeological remains of pit houses - semi-subterranean winter dwellings traditionally but not exclusively used by interior peoples. They tend to be found in protected valley bottoms rather than the surrounding higher ground.

Habitation sites are important for the study of past lifeways and generally have high heritage significance, particularly for ethnographically documented villages. Because of their nature as habitation locales, these sites frequently have more than one functional descriptor since cache pits, sweat lodge depressions, mat lodge depressions, roasting pit features, CMTs, lithic scatters, human burials and rock art are often present in some combination.

Subsistence Features:

Subsistence features are features associated with the hunting, fishing, gathering, storage or processing of foods. In the interior region, such features include cache pits, roasting pits and above ground caches. Like habitation sites, cache pits (subterranean storage pits) and roasting pits are often found in the vicinity of a water source and are often a component of larger multi-function sites. Subsistence features, however, can be found anywhere a temporary hunting, fishing or plant resource gathering camp may have been set up, often in locations away from principal habitation sites.

Lithic (Stone) Scatters:

Lithic scatters are sites comprised of stone tools, stone tool fragments, and *debitage* – the flakes of stone that are produced when stone tools are manufactured. These stone artifacts may be found scattered across the ground surface or may have been buried since their original deposition.

These sites may vary from a single, isolated artifact—a stone arrowhead, knife, or hide-scraper, for example—to extensive scatters of hundreds of tools, tool fragments and *debitage* (waste) flakes.

Culturally Modified Trees:

In the most general sense, culturally modified trees (CMTs) are any trees having evidence of human modification. In a more specific and commonly used sense, CMTs are trees that have been modified by aboriginal people for traditional purposes such as removal of bark or wood for traditional building materials, and removal of cambium for consumption. Provincial guidelines suggest most CMTs should be recorded as traditional use sites unless they pre-date AD 1846. In the interior of the province, bark-stripped lodgepole pine, ponderosa pine and birch are most common.

Archaeological and heritage sites recorded in the project area:

Numerous lithic scatter and CMT sites are recorded within or in the immediate vicinity of the proposed development area.

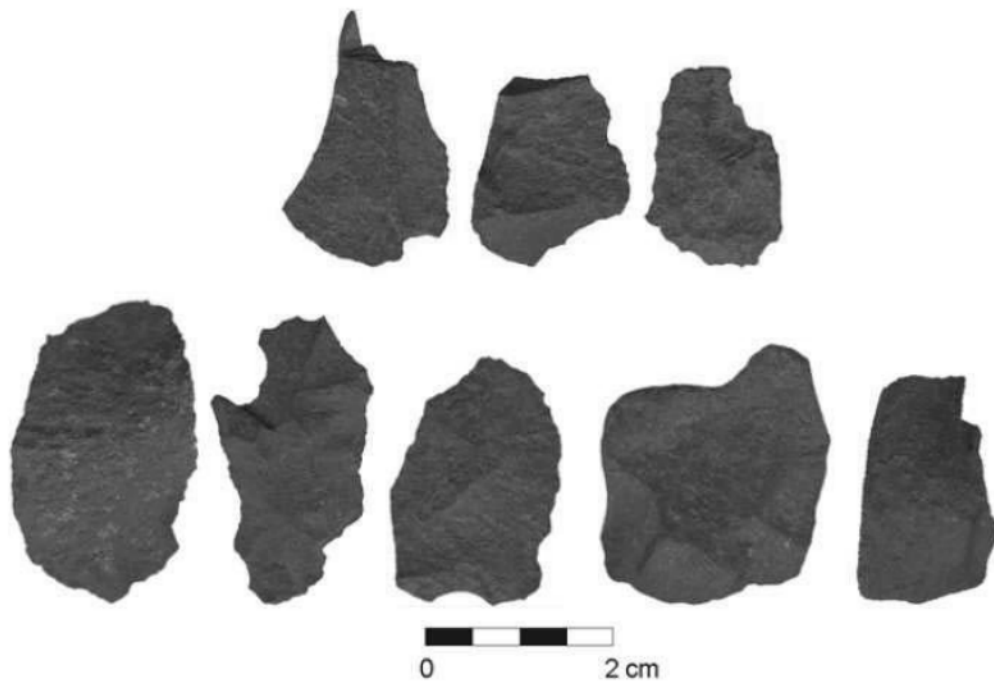
If you encounter archaeological or heritage resources:

If possible archaeological or heritage resources are encountered, or human remains are suspected, during the course of development, the following steps are required:

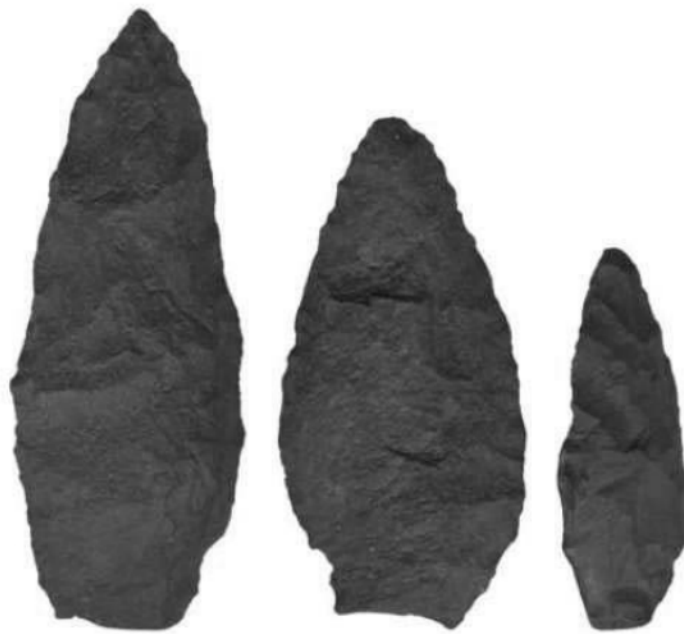
- Cease all forms of ground disturbance in the immediate vicinity of the find and leave all possible archaeological or heritage materials in place.
- Establish a protective buffer of at least 20 m surrounding the extent of the find area and demarcate the buffer in a highly visible and clear manner (eg. 'No Work Zone' flagging).
- Record GPS location of the found materials, if able.
- Briefly note the type of archaeological materials you think you've encountered, and their location, including, if possible, the depth below surface of the find
- Photograph the exposed materials, preferably with a scale (a yellow plastic field binder will suffice).
- Notify the Environmental Monitor immediately. The Environmental Monitor will then report the find to the Mine Manager who will promptly notify the Archaeology Branch of the Ministry of Forests, Lands and Natural Resource Operations directly or through a professional archaeologist.
- Should suspected human remains be discovered, procedures would follow the Archaeology Branch Policy Statement "Found Human Remains" (Archaeology Branch, 1999). Local law enforcement will also be informed in the event of found human remains



Lithic (Stone) Scatter



Debitage (waste material from stone tool manufacturing)



Projectile Points



Culturally Modified Tree (CMT)

Page 404

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s.16;s.18

**Appendix 3 –
Map of AIA and Archaeological Sites
New Prosperity Gold-Copper Project**

Page 406

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s.16;s.18



Ministry of
Energy and Mines

July 17, 2017

File: 16475-20/0300150

Reasons For Decision

Mines Act Permit: MX-3-131
Permittee: Taseko Mines Limited
Project: New Prosperity Site Investigation Program
Notice of Work #: 0300150201601

The purpose of this letter is to provide notification of my decision regarding Taseko Mines Limited's (TML) Notice of Work Application #0300150201601 (the Application) for the New Prosperity Site Investigation Program in the vicinity of Teztan Biny (Fish Lake), Yanah Biny (Little Fish Lake), and the surrounding Nabas area.

This letter provides a summary of my considerations, including Tsilhqot'in National Government (TNG) concerns raised during consultation, any opportunities for mitigation or accommodation of impacts, and my decision to issue the *Mines Act* permit. My considerations and rationale are limited to the authorization issued under the *Mines Act*. I do not speak to activities associated with the Ministry of Forests, Lands and Natural Resource Operations consideration of the Occupant Licence to Cut (OLTC) application, nor to any other authorizations which may be required by TML.

This letter does not by any means capture all information I have reviewed, nor all considerations I have contemplated, but is a summary of them.

LEGISLATIVE AUTHORITY

Under Section 10 of the *Mines Act*, R.S.B.C. 1996, c. 293 before any mining activity can commence the proponent of the activity must have an approved authorization under a *Mines Act* permit unless exempted in writing by the Chief Inspector of Mines. In order to undertake the proposed activities, the Permittee Taseko Mines Limited (TML) requires, and applied for, an amendment to its *Mines Act* exploration permit, MX-3-131, through the submission of Notice of Work application #0300150201601 (the Application), for the New Prosperity Site Investigation Program.

I am an Inspector of Mines appointed pursuant to Section 5 of the *Mines Act* with delegated authority under the Chief Inspector of Mines at level 6 in accordance with the delegation matrix dated November 2, 2007. I have the delegated authority of the Chief Inspector of Mines to make *Mines Act* permit decisions for applications within prescribed thresholds of exploration and mining activity. (See **Appendix 1**, Delegation of Chief Inspector's Authority under the *Mines Act* – Section 10). The level of proposed activity in the Application is within my delegated authority.

As an employee of the BC Ministry of Energy and Mines (MEM), I am guided by the Purpose, Vision and Mission of the Ministry which states:

Purpose: *The Ministry of Energy and Mines is responsible for British Columbia's electricity, alternative energy, mining and mineral exploration sectors. These sectors are made up of diverse interests that explore for and produce coal and other valuable minerals and that develop electricity, clean or renewable energy sources, including biomass, biogas, geothermal, hydro, solar, ocean, wind and low-carbon transportation fuels. Through teamwork and positive working relationships with its clients and stakeholders, the Ministry facilitates thriving, safe, environmentally responsible and competitive energy and mining sectors in order to create jobs and economic growth in communities across the province. In fulfilling its mandate, the Ministry consults with other ministries and levels of government, energy developers and marketers, mineral exploration and mining companies, First Nations, communities, environmental and industry organizations, and the public.*

Vision: *We envision thriving, safe, environmentally responsible and competitive energy, mining and petroleum resource sectors, which contribute to the economic growth and development of communities throughout British Columbia.*

Mission: *We facilitate a positive climate for the economic, environmental and socially responsible development of British Columbia's energy, mining and petroleum resources for the benefit of British Columbians.*

MEM administrative staff corresponded with TML staff from October 17, 2016 through November 8, 2017 to ensure the Application met MEM's content requirements. MEM administrative staff accepted the Application as complete on November 8, 2016. As MEM Inspector, I completed my technical review of the Application on November 18, 2016, accepted the Application, notified TML that an additional reclamation security of \$105,500 must be provided, initiated referrals of the Application to government review agencies, and requested Ministry of Forests, Lands, and Natural Resource Operations First Nations Relations staff (MFLNRO FNR) initiate the consultation process with affected First Nations regarding the Application.

I have reviewed the Application and am satisfied that the Application and supplementary attachments have been prepared and submitted in accordance with Section 10 of the *Mines Act* and with the *Health, Safety and Reclamation Code for Mines in British Columbia* (the Code), Part 9.1.1 and 9.2.1 (1). The Application meets the content requirements and is acceptable from a technical point of view.

OVERVIEW OF THE APPLICATION

Location

The Application area is located in the Cariboo-Chilcotin region in central British Columbia, about 125 kilometres southwest of Williams Lake. Access to the exploration area is 20 km west of Williams Lake on Hwy 20 to Lee's Corner (Hanceville), then south southwest 64 km on the Chilko Lake – Nemiah Valley Gravel Road to the Vicks Lake Road Junction, then approximately 21 km on the 4500 Road to the site.

First Nations

The Application area is located within the asserted traditional territories of the Tsilhqot'in Nation and Esketemc. The Application area is located largely within the Tsilhqot'in Nation's Proven Rights Area, which was that portion of the Claim Area in *Tsilhqot'in Nation v. British Columbia*, 2007 BCSC 1700, where Justice Vickers found: the Tsilhqot'in people have an Aboriginal right to hunt and trap birds and animals for the purposes of securing animals for work and transportation, food, clothing, shelter, mats, blankets and crafts, as well as for spiritual, ceremonial, and cultural uses; inclusive of a right to capture and use horses for transportation and work; and Tsilhqot'in people have an Aboriginal right to trade in

skins and pelts as a means of securing a moderate livelihood, but which is located outside of the declared Aboriginal Title Area in *Tsilhqot'in Nation v. British Columbia*, 2014 SCC 44.

Activities

TML submitted the Application for an amendment to their *Mines Act* permit MX-3-131 on October 17, 2016. The Application involves a site investigation program consisting of: establishment of a 50 person camp of 11 mobile trailer units; a temporary core shed to store drill core; a base camp staging area; a fuel storage site for up to 10,000 litres of fuel; 20 km of brushed cut lines; construction of 367 test pits; 122 geotechnical drill sites; 48 km of new exploration trails; modification of 28 km of existing access trails; and 7 water intake points.

Disturbance

The Application proposes 47.2 ha of total disturbance (16 ha of which is located on previously disturbed and/or reclaimed areas) and cutting of 1084 m³ of timber. The Application proposes construction of exploration trails and creation of small openings for drill sites and test pits dispersed throughout a polygon of approximately 3067 ha in area. The Application disturbance of 47.2 ha would result in a physical disturbance of about 1.5% of that polygon area.

Term

The Application is for a 3 year, multi-year, area-based approval to conduct work from January 1, 2017 to December 31, 2019. TML indicates they wish to conduct the majority of their work within a period of 6 months within the first year, but wish to maintain some flexibility in site locations, and/or conduct some of the work in Years 2 and 3, depending on the findings of their initial site investigation work.

Supplementary Materials

TML included supplementary materials as part of the Application, including:

- Maps – showing location, areas for multi-year area-based work, proposed Year 1 work, tenures, topography, existing disturbance and archaeological sites;
- New Prosperity Description of Work Program – providing greater details on the Site Investigation Program;
- Table of Engagement and Consultation – New Prosperity NOW – documenting 33 letters, emails, phone calls and meetings between TML and First Nations (21 with TNG, 4 with Esketemc, 3 with Canoe Creek, 2 with Ulkatcho, 2 with Williams Lake Indian Band, and 1 with Xat'sull) prior to TML submitting their Application;
- Appendix C Emergency Response Plan – required to meet environmental protection and worker health and safety requirements of MEM; and
- Appendix D Archaeological Management Plan – stating that the planning of activities will take into consideration the location of known archaeological and heritage resources as defined by Terra Archaeology in the July 2008 *Taseko Mines Ltd. Proposed Prosperity Gold –Copper Mine Located at Fish Lake, British Columbia Archaeology Survey Unit Report*. Also stating activities will be planned to avoid these sites, and activities in areas not yet assessed for archaeological and heritage resources are strictly prohibited until such time as a Preliminary Field Reconnaissance or Archaeological Impact Assessment has been completed. Additionally, the Archaeological Management Plan included: Appendix 1 Archaeology and Heritage Resources Protection Procedure for Exploration at New Prosperity Gold-Copper Project, and Appendix 2 Chance Find Protocol for Archaeological Sites New Prosperity Gold-

Further details of the Application were included in Notice of Work Application #0300150201601.

Project History

Exploration History

Prospected since the 1930s, the Prosperity/New Prosperity ore body was discovered in the late 1960s and has seen extensive exploration work to define an ore body in anticipation of a metal price regime that would support mine development. TML has held mineral tenures over the project area for 48 years - since at least 1969, and has sought to advance the project through numerous Notice of Work applications for mineral exploration activities since at least 1979 and up to the most recent Application submitted on October 17, 2016.

Major Mine Project History

TML submitted the Prosperity Gold-Copper Project to the provincial environmental assessment process in 1995. TML submitted an environmental impact statement/application for the Prosperity Project mine development after the completion of an updated feasibility study in 2007. The environmental impact statement/application was subject to reviews under British Columbia's *Environmental Assessment Act* and the *Canadian Environmental Assessment Act* from 2009 through 2010. The province granted the Prosperity Project an Environmental Assessment Certificate on January 14, 2010. The federal government announced on November 2, 2010 that federal approval was not granted for the Prosperity Project as was then proposed.

TML submitted the New Prosperity project description dated August 2011 to the provincial Environmental Assessment Office (EAO) requesting an amendment to their Environmental Assessment Certificate, and to the Canadian Environmental Assessment Agency for a federal review. TML stated the New Prosperity project description was designed to address the deficiencies identified in the federal review process of the Prosperity Project. TML also requested a 5 year extension to their existing provincial environmental assessment certificate.

The federal Minister of Environment announced a decision on February 25, 2014, stating the Governor in Council had decided that the significant adverse environmental effects the New Prosperity Project is likely to cause are not justified in the circumstances.

The province granted a 5 year Environmental Assessment Certificate extension on January 13, 2015. The application to amend the provincial Environmental Assessment Certificate remains under review and pending a decision.

CONSULTATION WITH TSILHQOT'IN NATIONAL GOVERNMENT

The province has a duty to consult and, if appropriate, accommodate First Nations with respect to decisions that could adversely impact asserted or established Aboriginal or treaty rights and title. The content of the duty to consult varies with the circumstances.

While the province does not generally provide capacity funding for consultation on individual Notice of Work applications, the province provided the TNG with \$18,000 in capacity funding to review the Application, given the particular circumstances regarding the proposed mining activity in this particular area.

Consultation with the TNG at the deep end of the consultation spectrum was initiated by the MFLNRO First Nations' Relations staff on November 22, 2016. The province submitted an Initial Impacts Assessment to the TNG for review and comment. The TNG provided their response and the province incorporated their input into a Revised Impacts Assessment and provided it to the TNG for their review and comment. During this time, all relevant information regarding the proposed activity was shared

with the TNG with opportunities for discussion of potential impacts on their Aboriginal Interests, and proposals about how those impacts could be avoided, mitigated or otherwise addressed.

During the consultation process, the province requested that TNG provide any further additional information about TNG's interests in and around the project area. The province acknowledged that within the Proven Rights Area (which includes most of the Application area), the Tsilhqot'in have Aboriginal rights to hunt and trap birds and animals for the purposes of securing animals for work and transportation, food, clothing, shelter, mats, blankets and crafts, as well as for spiritual, ceremonial, and cultural uses. This right is inclusive of a right to capture and use horses for transportation and work. Tsilhqot'in people have an Aboriginal right to trade in skins and pelts as a means of securing a moderate livelihood. The Province has previously admitted the Xeni Gwet'in have an aboriginal right to fish throughout their traditional territory, which includes the area of the Application. The TNG also asserts Aboriginal rights to gather and participate in spiritual/cultural activities in the Application area.

I acknowledge that the TNG has made a very substantive effort to effectively portray and communicate their Aboriginal rights and interests in, and deep and special connection to, the Teztan Biny (Fish Lake), Yanah Biny (Little Fish Lake), and surrounding Nabas area. Documentation and additional cited references provided by the TNG for my review and consideration number well over 10,000 pages. Despite that being an extraordinary volume of information for consideration relative to most other Notice of Work applications, I have read and considered in my decision all of the documentation provided by the TNG throughout the consultation process on the Application.

I have also considered correspondence I was copied on between the TNG and TML regarding the anticipated Application both prior to, and subsequent to, submission of the Application to MEM. I have also considered all key correspondence between the province and both the TNG and TML relevant to the Application, which in the interest of transparency the province shared with the TNG and TML where appropriate.

Where information received represents dissenting views and positions of the TML and TNG, I have conducted my own due diligence to allow me to make an informed assessment and determination as required of a Statutory Decision Maker. Any third party reports or assessments I have relied upon to assist me in that regard, have been provided to the TNG and TML.

The TNG raised a number of specific issues during the consultation process concerning the potential impacts from the Application on their Aboriginal Interests, which I have considered and attempted to mitigate in making my decision to approve the Application.

The TNG has provided information with respect to: court proceedings specific to the project, their rights, interests and activities to the Application area, and surrounding area; federal environmental assessment reviews of the New Prosperity and Prosperity major mine project proposals; cultural heritage studies; wildlife studies and impact assessments including landscape level issues; their tribal park declaration; and numerous other matters. I have given my full consideration to these matters and made my own independent determinations as to the significance and appropriate weighting of each in making my decision.

Prior to proceeding to a decision, MFLNRO First Nations Relations' staff provided a recommendation to me in late May 2017 that the consultation process which had been undertaken was sufficient for me to proceed to determination. I accepted this recommendation. However, I have also reviewed and considered all further comments submitted by the TNG up until the date of my decision, as well as relevant correspondence between the Ministry of Aboriginal Relations and Reconciliation and TNG, which I will discuss below. I am satisfied that the consultation process with the TNG was reasonable and appropriate to allow me to proceed with my decision on the Application. I have considered the information assessed and provided throughout the consultation process and have also considered the

measures taken to mitigate impacts from the Application on the exercise by TNG of their rights to be adequate and appropriate to accommodate for the activities under the NOW. A partial listing of documents I have considered in making my decision is included in **Appendix 2**.

BROADER CONSIDERATIONS IN MY DECISION

I am aware that the Application presented to me for consideration is the latest in a long series of mineral exploration applications, and related provincial and federal reviews of major mine project applications, for a mine project in this area. I am also aware of the following background and context for my current determination including land use planning initiatives for the area of the Application, land use designations including protected areas, federal and provincial environmental assessment processes, the Supreme Court of Canada decision of *Tsilhqot'in Nation v. British Columbia* (and findings of the trial court), the decision in *Taseko Mines Limited v. Phillips*, (2011 BCSC 1675) and the Province's reconciliation initiatives with the Tsilhqot'in Nation, including the Nenqay Deni Accord and Tsilhqot'in Stewardship Agreement.

1. Land Use Planning Initiatives and Designations

The Tsilhqot'in assert that approval of the activities in the Application will result in an unjustifiable infringement of their Aboriginal rights and have made reference to their declaration of the Dasiqox Tribal Park, the Nenqay Deni Accord, Justice Vickers' findings in his 2007 decision of *Tsilhqot'in Nation v. BC, Taseko Mines Limited v. Phillips*. This has led me to consider the above mentioned items specifically, and within a broader context for further understanding.

I have considered the location of the Application in relation to: the asserted Tsilhqot'in Traditional Territory of ~62,142 square km; the Claim Area in *Tsilhqot'in v. British Columbia* of ~4,380 square km; proximity to the declared Aboriginal Title Area of ~1,750 square km, and the Application's location largely within the Proven Rights Area, as defined earlier, of an estimated ~2,500 square km.

The Application area has been included in a number of land use planning processes including the 1993 Chilko Lake Study and the Cariboo Chilcotin Land Use Plan. Prior to the formation of the Chilko Lake Study Team, the area had been the focus of debate for many years over appropriate land uses. The area had been set aside as a Deferred Planning Area due to ongoing land use conflicts.

The Chilko Lake Study Team produced the Consensus Report of the Chilko Lake Study Team in September 1993. It was the outcome of a consensus-based process co-chaired by Chief Roger William, Nemiah Valley Indian Band (former name of the Xeni Gwet'in First Nation). The report recommended establishing a 230,000 ha protected area for Zone 1: Chilko Lake, Tchaikazan Valley, Yohetta, and Long Valleys, as a Class A Provincial Park to be jointly managed between the province and the Nemiah Valley Indian Band. Most of this area was subsequently designated as Ts'il?os Provincial Park. The report also made detailed recommendations for activities in Zone 2: the Taseko Management Zone, including the Taseko Lakes Area, Lower Lord and Tchaikazan River Valleys and Gunn Valley, as a special management zone, and a transition zone between Ts'il?os Provincial Park and the general forest management lands to the east. The report made less detailed recommendations for Zone 3 – where the Application is located- as general resource management zone, and made similar recommendations for other peripheral zones.

Together, these planning processes resulted in the Province creating four Class A Parks near the Application area, including: Ts'il'os Provincial Park – within 10 km (2332 square km); Nunsti Provincial Park – within 30 km (209 square km); Big Creek Provincial Park – within 15 km (679 square km); and Bishop River Provincial Park abutting Ts'il'os (199 square km). Later, the South Chilcotin Mountains Provincial Park (568 square km) was created abutting Big Creek Provincial Park to the south. Provincial Park designations do not preclude the exercise of Aboriginal rights, including hunting, trapping, fishing, gathering, and cultural/spiritual activities.

These Class A Provincial Parks provide 3,987 square km of pristine, un-roaded or largely un-roaded areas, with significant wildlife values for a variety of species, and are located within proximity to the Application area. Nunsti Provincial Park specifically protects valuable moose habitat of wetlands and small lakes. These Provincial Park descriptions all note a history of occupation and cultural use by the Tsilhqot'in for hunting, trapping, fishing, food gathering, and medicinal plant gathering, with some significant spiritual values mentioned as well.

2. Tsilhqot'in Declarations

On August 23, 1989, the Nemiah Valley Indian Band declared an area including and surrounding the Application area to be the Nemiah Aboriginal Wilderness Preserve under the Nenduwh Jid Guzitin Declaration (Nemiah Declaration).

The 6 Tsilhqot'in Bands signed an Affirmation of the Nemiah Declaration on March 29, 2015 which affirmed the Nemiah Declaration as their law governing both the Declared Title and Rights Area granted by the Supreme Court of Canada in *Tsilhqot'in Nation v British Columbia*, 2014 SCC 44 and the declaration of Aboriginal rights affirmed by the British Columbia Court of Appeal in *William v British Columbia*, 2012 BCCA 285. The Nemiah Declaration states, amongst other things, that all activities and development in the Declared Title and Rights Area must be consistent with the terms of the Nemiah Declaration, which states: no commercial logging - only local cutting of trees for their own needs: i.e. firewood, housing, fencing, native uses; no mining or mineral exploration; and no commercial road building.

The TNG issued a press release on October 3, 2014, stating the Xeni Gwet'in and Yunesit'in Government, with the support of the Tsilhqot'in National Government, would announce the creation of the Dasiqox Tribal Park on October 4, 2014. The Application area is located within the 3,000 square km area which the Tsilhqot'in declared is Dasiqox Tribal Park. This 3,000 square km area encompasses roughly all of the land between: Ts'il'os and Bishop River Provincial Parks, and the Aboriginal Title Lands to the west, Big Creek and South Chilcotin Mountains Provincial Parks to the east, and Nunsti and Eleven Sisters Provincial Parks to the north, and then extends beyond those to the Chilko River to the northwest. The Yunesit'in and Xeni Gwet'in First Nations later informally declared the Dasiqox Tribal Park in July 2015.

The province has communicated to the TNG that the province does not support their unilateral declaration of the tribal park, and that those TNG interests are best brought to negotiating table of the Nenqay Deni Accord as part of the broader reconciliation discussions between the TNG and the province.

3. Current State of the Landscape: Forest Cover, Natural Disturbance Patterns, Human-Caused Disturbances and Wildlife Habitat

The TNG state in their responses to the Application that Nabas, Teztan Biny and Yanah Biny area is a relatively pristine area, but has been impacted by mineral exploration activities and this is the third mineral exploration application in 8 years. TML states in the Application, and in their responses to the TNG comments, that the Fish Creek watershed has experienced a diversity of uses including logging, recreation, hunting, fishing and commercial cattle grazing. After my review of MEM files for this project, forest cover maps, aerial images, natural disturbance history including forest fires and insect infestations, road density review provided by S. Senger, and cumulative effects and impacts assessments provided by R. Hoffos (2010, 2017), and C. Williston (2016), I find that both statements can be supported in describing the Application area.

Historically, the South Chilcotin landscape has been a fire driven ecosystem. Fire history records since the early 1900s show numerous large fires have occurred throughout the Tete Angela Landscape Unit, which contains the Application area, including two recent large wildfires in 2009 and 2010. Approximately 40% of the Application area has lodgepole pine leading stands of 61-80 years old, and approximately 34% of the Application area has mixed species old growth forest stands of 141-250 years old. Numerous natural grassy meadow and wetland openings are interspersed amongst the standing timber in the Application area. Unlike the landscape to the east, the Application area has not been subjected to epidemic mountain pine beetle infestations followed by extensive clear cut logging to salvage economic values from the dead timber. The Application area, however, has been subject to endemic mountain pine beetle infestations from 2003 through 2007 resulting in the death of many of the mature lodgepole pine trees.

The Application area has a history of clearing of small, dispersed areas for the construction of exploration trails, drill pads and test pits for mineral exploration activities from numerous applications dating back to at least 1979. The most intensive areas of human-caused disturbance in the Application area are north of Teztan Biny (Fish Lake) in the area where the open pit is proposed, and between Teztan Biny (Fish Lake) and the proposed open pit. These areas are reported to have been reclaimed to the standard of the day, and have been re-vegetated to control erosion and noxious weeds.

Activity reports, reclamation monitoring reports and photos, and reclamation reports and photos provided by the TNG and TML, provide written and visual indications of the conditions which existed prior to the 2012 exploration program, the reclamation activities undertaken, and the conditions which existed after reclamation work was completed in the fall of 2012. The reports document a number of mitigation and accommodation measures incorporated into both the exploration and reclamation activities. Reclamation activities include, but are not limited to: controlling noxious weeds and erosion, restoring natural drainage patterns, blocking vehicle and ATV access, preserving topsoil, and seeding, planting and natural ingress of vegetation to establish early seral stage herbaceous and woody forage species for wildlife, followed by re-establishment of coniferous trees.

The TNG has provided their views on the impact of the Application on wildlife, wildlife habitat, and their ability to exercise their Aboriginal rights in: their responses to the Province's impact assessments; elder's statements; photographs and descriptions of TNG members conducting traditional activities; and numerous supporting documents and reports. Some of the traditional activities are shown to be conducted in standing timber, while others such as collecting medicinal plants and food plants, gatherings, and construction of log cabins are shown to be conducted in logged areas and/or natural forest openings.

TML has responded with information showing their recent records of various species of wildlife continuing to use the Gibraltar Mine site at least to some degree, wildlife usage by a variety of species at other operating major mines in BC, and references to reclamation awards to mine properties for their reclamation efforts resulting in improved wildlife diversity and forage production as compared to the pre-mining condition.

In determining the impacts on wildlife and wildlife habitat, and any opportunities for mitigation of those impacts, I have relied upon; the impacts and cumulative effects assessments provided by R. Hoffos (2010, 2017), and C. Williston (2016);, the road density review by S. Senger provided by the TNG, and the information referenced; and the reports of the two CEAA review processes and the BC environmental assessment process regarding the Prosperity project proposal, where those reports are applicable to the Application. I have also relied on mitigation opportunities identified in these reports as considerations for permit conditions to mitigate the impacts of the Application.

A number of wildlife species are noted to benefit from early seral stage forage habitat located in close proximity to mature timber providing thermal and hiding cover. Early seral stage forage habitat can be either dynamic (resulting from fire or timber harvesting putting forested sites back to an earlier, shrubby successional stage that lasts a relatively short period of time at a specific location and then may be created at a different location by further disturbance) or static (including wetlands, riparian areas and self-sustaining deciduous forests, which are not created by disturbance and do not move around the landscape). For other species dependent on mature timber as their preferred habitat, those species and their prey will still make use of openings in the forest provided suitable habitat elements are provided within those openings. The greatest impacts from human-caused disturbances on many of the wildlife species results from increases in road densities and human use of those roads which can disturb and displace wildlife, increase vehicle collision mortality, and improve access for hunters and illegal poachers.

I acknowledge mature trees will be cut to create the openings for the trails, drill sites and test pits and these mature trees cannot be immediately replaced. However, opportunities exist through the reclamation and restoration program to mitigate and ensure any openings created provide valuable, early seral forage plants for wildlife, and that exploration trails are deactivated and reclaimed in a manner to address the road density concerns, prevent or deter vehicle, ATV, and hunter use, and provide habitat components for wildlife.

4. Strategic and Reconciliation Discussions and Agreements

I have considered strategic and reconciliation discussions and agreements between the province and the TNG, including:

- September 10, 2014 *Letter of Understanding between Her Majesty the Queen in Right of the Province of British Columbia and the Xeni Gwet'in First Nations Government, Tsilhqot'in National Government, on behalf of the Tsilhqot'in Nation*, committing to strengthen their government-to-government relationship and to undertake negotiations in good faith towards a lasting reconciliation between the Tsilhqot'in people and the Province of British Columbia.
- September 24, 2015 *Letter of Intent between Her Majesty the Queen in Right of the Province of British Columbia and the Tsilhqot'in Nation*, referencing the Letter of Understanding signed on September 10, 2014, committing to strengthen their government-to-government relationship and to undertake negotiations in good faith towards a lasting reconciliation between the Tsilhqot'in people and the Province of British Columbia.

- February 11, 2016 *Nenqay Deni Accord, The People's Accord, between Her Majesty the Queen in the Right of the Province of British Columbia and the Tsilhqot'in Nation* to establish a shared vision, principles and structures for the Parties to negotiate one or more agreements to effect a comprehensive and lasting reconciliation between the Tsilhqot'in Nation and British Columbia.
- March 31, 2017 *Tsilhqot'in Stewardship Agreement Between Her Majesty the Queen in the Right of the Province of British Columbia and Tsilhqot'in Nation and Tsilhqot'in National Government, A Strategic Engagement Agreement for Shared Decision-Making Respecting Land and Resource Management, 2017-2020 Agreement Renewal, Amended March 31, 2017.*
- April 1, 2017 Revenue-Sharing for Forest Harvesting within Tsilhqot'in Territory (FY2017-2018).

Despite the above reconciliation and accommodation initiatives and agreements between the Province and the TNG, mining activities in this location remain a subject of longstanding discussion and disagreement between the TNG and TML. Further, there have been and continue to be discussions between TNG and the Province in relation to previous exploration programs, and proposed mining projects. At the core of this issue is a lack of agreement on acceptable land uses in the area of the Application – which remains unresolved. I understand that the Tsilhqot'in do not consider commercial logging, mining or industrial road construction to be compatible uses in this area. The Tsilhqot'in state they have plans for a backcountry tourism economy for the area. Amidst this, TML seeks to provide value for its shareholders, and to advance its mining project to a producing mine, on mineral tenures that it has legally acquired and maintained for decades.

The TNG signalled early in the consultation process their intent to litigate if a positive permit decision is made. The TNG have stated that this is not a typical application, and they are unwilling to discuss mitigation or accommodation measures under the circumstances, other than the specific proposals which follow. The TNG maintains that due to: the impacts on their interests and Aboriginal rights; their deep connection to this special place; their proven Aboriginal rights; and the rejection of two major mine proposals by federal review panels, the only appropriate decisions for me to consider are: reject the Application; defer a decision on the Application until the federal government's position on the major mine project changes; or provide an approval with conditions that TML cannot exercise the Approval until the necessary environmental approvals have been obtained on this major mine project. The TNG maintains any other decision would not uphold the honour of the Crown.

TML has stated they are willing to engage collaboratively with the TNG, but that they cannot engage in a meaningful way if the only position taken by the TNG is that TML must drop the project or put the work on hold until other environmental approvals are first acquired. TML has stated that they are willing to offer further accommodations, but cannot offer any specific additional accommodations unless the TNG will engage with them, as speculative offers could be perceived as an affront by the TNG. TML has stated it is imperative that they undertake the work program in the Application to allow them to file a provincial *Mines Act* permit application, and achieve commencement of construction of their mine project by January 2020 as required under their Provincial EA certificate. TML maintains that failure to achieve commencement of construction by January 2020, with no possibility of further extension, would necessitate a new provincial EA application at an estimated cost of \$10 to \$15 million. TML has initiated legal challenges of the federal government's review process

and negative decision on New Prosperity, and the federal government's constitutional authority. TML maintains they have a legal right to develop their project, and that they will take all necessary action to defend that right, including litigation, if a decision is made to reject the Application.

5. Consideration of Impacts If the Project Were to Become a Major Mine

I have also considered the potential for impacts from a full mining operation when consulting on this exploration permit, including the appropriateness of having a mine in that location. It is possible that the potential impact of the exploration permit could be conceived as having a more serious impact on Aboriginal rights than if I were considering the impact of the exploration permit in isolation of a consideration of a future mine. That raises the question from a procedural fairness perspective of how can I appropriately consider the potential adverse effects of a future mine without also considering the potential measures that could mitigate or accommodate such effects? In my view it is not the gross impacts before mitigation measures that should be considered, it is the impact net of any offsetting mitigation or accommodation measures that should be considered. Further, it would seem appropriate that I would also have to consider not only the potential adverse impacts, but also the potential socio-economic, and other societal benefits which could accrue from a major mine project.

In considering this issue, I have considered the status and the outcomes of the Provincial and Federal Environmental Assessments of the Prosperity and New Prosperity Mine Projects, as well as the Application before me.

Prosperity Project

TML initially submitted the Prosperity Gold-Copper Project to the BC environmental assessment process in 1995. TML submitted an environmental impact statement/application for the Prosperity Project mine development after the completion of an updated feasibility study in 2007, and it was subject to reviews under British Columbia's *Environmental Assessment Act* and the *Canadian Environmental Assessment Act* through the period 2009 to 2010.

The Prosperity Gold-Copper Project as then conceived was to produce 70,000 tonnes of mineral ore per day over a 20 year operating life as an open-pit mining project. The project was expected (then) to contribute approximately \$340 million to provincial GDP annually, and \$400 million in provincial revenue and \$43 million to local and regional government over the life of the project. The total capital cost was (then) approximately \$800 million with annual expected operating costs of \$200 million. The project was expected to directly result in an average of 375 jobs during both the two-year construction period and the 20-year operational life of the project, and 325 person years of indirect employment annually over the life of the proposed project.

The reviews culminated in 2010. Through their respective reviews, the province and the federal government made similar findings that if the mine moved forward to development there would be no significant adverse effects to: air quality; terrain and soil; surface or groundwater quality; moose and mule deer and their habitat; vegetation, including old growth forest and grasslands; archaeological resources; fish in the Taseko River; water quality in Onion Lake; or human health.

The province's environmental assessment report concluded the project was not likely to result in any significant adverse effect, with the exception of the loss of Fish Lake and Little Fish Lake. Given the finding of a significant adverse effect, the province's assessment report provided ministers with a number of factors to consider prior to making their decision on whether or not to issue an Environmental Assessment certificate for the project. The provincial Environmental Assessment

certificate issued on January 14, 2010, contained 103 commitments the proponent must implement throughout various stages of the project.

The federal government environmental assessment process concluded there would be significant adverse effects on fish and fish habitat through the loss of Fish Lake, Little Fish Lake and some portions of Fish Creek. The federal panel review further determined that through the development of the Prosperity Project that there would be adverse environmental effects: on navigation; on the current use of the land and resources by First Nations for traditional uses; on potential or established Aboriginal rights or title; and (in combination with past, present, and reasonably foreseeable projects, including logging and ranching) on grizzly bears. On November 2, 2010, the federal government announced it would not approve the project, due to concerns that the significant adverse environmental effects of the Prosperity Project could not be justified as proposed. The federal government left it open to TML to submit a new application for a re-designed project to address those impacts.

Extension of Provincial Environmental Assessment Certificate for the Prosperity Project

The BC Environment Minister granted a five-year extension to the Environmental Assessment certificate on January 13, 2015 for the Prosperity Gold-Copper project, extending the date by which substantial construction on the mine project must have commenced to January 14, 2020. Under current legislation no further extensions may be granted.

Federal Review of the New Prosperity Project

TML presented the New Prosperity Project Description dated August 2011 to CEAA, describing the New Prosperity Project as including a mine development plan that avoids the significant adverse environmental effects of the former Prosperity Project. TML stated in comparison to the Prosperity mine proposal that was reviewed by CEAA in 2009/2010, the development design for New Prosperity (predicated on higher long term prices for both copper and gold) results in a direct increase in capital costs of \$200 million and a \$100 million in direct operating costs over the 20-year mine life to locate the tailings dam and mine waste away from Fish Lake.

Federal Decision on the New Prosperity Project

The federal Minister of the Environment established a Review Panel for the New Prosperity Gold-Copper Mine Project on May 9, 2012 in accordance with the *Canadian Environmental Assessment Act*. The Review Panel submitted its report to the new Minister of the Environment on October 31, 2013. The Federal Review Panel concluded that New Prosperity would result in a significant adverse effect on fish and fish habitat, on Tsilhqot'in current use of lands and resources for traditional purposes, and on Tsilhqot'in cultural heritage and that that effects cannot be mitigated.

On February 25, 2014, the Minister announced the federal decision that, after consideration of the Panel report and the implementation of mitigation measures that she considered appropriate, the New Prosperity Project was likely to cause significant adverse environmental effects, and that she had referred the matter of whether those significant adverse environmental effects were justified in the circumstances to the Governor in Council. The Governor in Council subsequently determined that the significant adverse environmental effects that the New Prosperity Project is likely to cause were not justified in the circumstances.

TML has stated that to the extent that the federal decision presents any impediment to the start of construction going forward, TML seeks to address that issue through the two judicial reviews it has pursued and views the provincial decision as independent of those processes.

Provincial Review of Amendment to Certificate Application for New Prosperity Project

TML also made a request to the BC Environmental Assessment Office (EAO) regarding the related matter of their certificate amendment application for the New Prosperity Project – submitted August 2011. The EAO has not yet made a decision on the certificate amendment application for the New Prosperity project.

Consideration of Major Mine Project Impacts During the Review of this Application

I have considered the potential for adverse impacts upon the TNG's Aboriginal Interests should the exploration activities in the Application eventually lead to the development of a major mine. I have identified a number of limitations and uncertainties in that consideration, including the speculative nature of the mining industry, the lack of certainty as to any final mine plan design given the status of the environmental assessment processes, the potential economic and social benefits which could be associated with the mine should it be developed, and the potential mitigations, conditions and accommodations which could also be considered by future decision-makers in the course of its development in order to avoid, minimize or otherwise offset such adverse effects.

While I have had the benefit of some information in regard to the potential for a full mining project being developed in this location from the previous federal and provincial EA review processes (in addition to materials specifically raised during my consideration and consultation on the Application) I am of the view the potential impacts of a future mine in the context of consulting on this exploration Application, is highly speculative.

6. Tsilhqot'in Statement on the Only Decisions Which Could Uphold the Honour of the Crown

The TNG stated in their January 24, 2017 response to the initial engagement request that:

“The Ministry and TML have suggested that the 2017 NOW is required if TML is to “substantially start” the New Prosperity project before its provincial EA Certificate for Prosperity expires in January 2020. This position is entirely speculative. It is contingent on a series of pre-conditions, e.g.: (1) TML would have to succeed in its legal challenges to the Federal Government’s rejection of New Prosperity; (2) the Federal Government would have to reverse its position and approve New Prosperity; and (3) BC would have to approve TML’s application to amend the “Prosperity” Environmental Assessment Certificate. Each of these conditions is, at best, uncertain. All of them would have to occur before TML could “substantially start” the project.

With respect, it cannot be considered honourable for the Crown to authorize the NOW 2017 program—and all of its attendant impacts for the Tsilhqot'in people— based solely on the speculative and remote possibility that TML might someday have an approved project to construct.

The Federal Government’s rejection of New Prosperity is just that: a full and final rejection of the project. A government decision rejecting a project is equally as valid as a government approval for a project: in either case, the decision must be considered valid and effective unless and until it is set aside by a court.”

Through their legal counsel, the TNG submit that as the stated purpose of the Application is to collect information required for a *Mines Act* permit application for a mine project which the Federal government has rejected twice and which therefore cannot be built, any further disturbance or adverse

impacts on Aboriginal rights is unwarranted. They further have stressed to me that the only decisions which would uphold the Honour of the Crown would be: to reject the Application; to defer any decision until there has been a change in the Federal position on New Prosperity; or in the event a decision is made to approve the Application, that such approval be conditional on TML first obtaining the necessary environmental assessment approvals for New Prosperity. The TNG, through their legal counsel, have also made submissions that while Taseko has initiated legal challenges of the Federal government's jurisdiction to preclude development of New Prosperity, and of due process and fair hearing in the Federal panel review process, the outcomes of both proceedings are highly speculative and cannot be relied on.

The TNG reiterated the above position in their April 18, 2017 response to the revised impact assessment from MFLNRO First Nations Relations staff dated March 13, 2017.

Section 10 of the *Mines Act*, and section 9.2.1 (1) of the Health, Safety and Reclamation Code for Mines in BC (the Code), describes the application and notice requirements for this type of Application. The Code does not require a purpose statement and no purpose statement was included in the Application submitted for review. TML has stated varying purposes for this Application in different levels of detail in their correspondence to the TNG. (John McManus to Chief Joe Alphonse, July 29, 2016; John McManus to Chief Joe Alphonse, October 13, 2016; Meeting minutes of the September 12, 2016 between the TNG and TML in Vancouver)

MFLNRO First Nations' Relations staff made efforts to confirm the purpose of the application with TML for the consultation process and stated in the Province's revised impact assessment dated March 13, 2017:

"Purpose of Proposed Activity:

Taseko Mines has indicated previously, in a letter addressed to Chief Joe Alphonse that this notice of work application is necessary in order to obtain information that will support the detailed design work required in order to complete and file the provincial Mines Act and Environmental Management Act permit applications. The existing provincial EA certificate will expire early 2020 if the project has not been substantially started, and thus, Taseko is moving forward with gathering the additional information to support its ability to substantially start prior to the provincial EA certificate expiration. They expect the NOW filed program to take approximately 6 months to complete, which will support TML's ability to prepare, consult and file a Mines Act operating permit application.

It is recognized that for the New Prosperity project to proceed, TML is required to obtain various provincial and federal approvals, including environmental assessment approval under the Canadian Environmental Assessment Act, 2012 and the provincial Environmental Assessment Act. The existing provincial EA certificate relates to the original Prosperity mine project and section 9 of the Environmental Assessment Act prevents the issuance of any Mines Act permit for authorizing the construction or operation of the New Prosperity Mine. Taseko Mines has submitted a request to the Environmental Assessment Office (EAO) to amend its certificate and we understand the EAO will be in contact with you shortly regarding next steps on that amendment process. With respect to the federal environmental assessment, it is recognized that following a federal review panel process, in November 2010, the federal government declined to issue an environmental assessment certificate for the Prosperity project, and in February 2014, following another federal review panel process, the federal government made a decision to reject the New Prosperity project. However, TML has since

challenged in Federal Court the federal government's 2014 decision on this project. Should the previous federal decision be reconsidered as a result of that court challenge, and should the request to amend the existing EA certificate be granted, Taseko Mines is preparing to have the provincial permitting sufficiently advanced, prior to early 2020, to prevent the expiry of that EA certificate."

I have also reviewed TML's statements regarding: their urgency to meet their EA certificate requirement to substantially commence construction of the mine prior to January 2020; their investment of \$20 million to date in environmental assessment processes which would be lost if they cannot substantially start the project by that date; their estimated additional costs of \$10 - \$15 million to re-enter the BC EAO process if their current environmental assessment certificate expires; and the anticipated additional 2 year delay in their project.

My statutory decision on this Application is a separate and independent process from the federal review process for the major mine project. I have given some consideration in my decision to the fact that the federal government has rejected two different project designs, however the federal decisions do not preclude further planning and development in the area and TML is not precluded from applying with a new project design.

In consideration of all of the above, I find that I cannot reasonably refuse to issue a *Mines Act permit* for the Application based solely on the TNG's position that the stated purpose of the Application is to collect information required for a *Mines Act* permit application for a mine project which the Federal government has rejected.

Consideration of "Deferral Until Federal Government Position Changes", or "Approval With a Condition that it Cannot be Exercised Until the Federal Government Position Changes"

I have considered the TNG's alternate suggestions together, either that I defer any decision until there has been a change in the Federal position on New Prosperity; or in the event I decide to approve the Application, that the approval be conditional on TML first obtaining the necessary environmental assessment approvals for New Prosperity.

I am aware that TML has challenged the federal government's decision in federal court through a judicial review process, the hearing of which occurred in early 2017. I have not participated in or observed that process, nor am I aware of any of the details, the likelihood of TML being successful, or of any expected date for a court decision.

While I have given some weight to the federal government's rejection of the two project proposals submitted to date, in consideration of all of the above, I do not find it would be reasonable for me to effectively subjugate my statutory decision making responsibilities to review processes conducted by other parties for decisions having a different order of magnitude, impacts, and mitigation and accommodation opportunities, than the Application before me. Further, I am of the view it would be unreasonable for me to rely on those parties' terms of reference, summary reports, and recommendations, without having to also access to the full suite of information those parties were provided, and the opportunity to make my own informed determinations. Nor do I find it reasonable under the circumstances, for me to place an indefinite delay on TML's ability to proceed with the work program set out in the Application, which could potentially preclude their ability to meet their EA certificate deadline, when I have found their application to be technically acceptable, and in view of the assessment that the province has met its consultation obligations.

DISCUSSION OF KEY ISSUES AND CONCERNS

Provincial representatives, including myself, heard various concerns from the TNG throughout the consultation process. I have reviewed and considered all of the relevant facts and all other arguments and concerns provided by the TNG even if they are not specifically identified in this letter. My considerations of key issues and concerns advanced by the TNG are identified below and include permit conditions and accommodations.

TML is already required to meet all requirements of the *Mines Act*, and the Health, Safety and Reclamation Code for Mines in British Columbia (the Code), which apply to the activities they are conducting. I have avoided re-stating or duplicating those requirements as permit conditions. I have developed permit conditions where I have identified that additional measures, more specific measures, or more restrictive measures than those provided in the *Mines Act* or the Code are required to address TNG concerns raised through the consultation process.

TNG Concern:

1. *The project area, Teztan Biny (Fish Lake) and Nabas holds a significant spiritual and emotional attachment for the TN (Tsilhqot'in Nation). In response to this Notice of Work, members of the TN have indicated that approval of the exploration/drilling work will alienate them from this culturally and spiritually significant part of their traditional territory. They have indicated that they will not use the area for hunting, fishing, gathering while the machinery and workers are present. Members of the TN have also shared that if the larger open pit mine project gets approved, it will alienate them from a culturally significant part of their traditional territory.*

The mineral drilling activity may cause some wildlife species to change their use of the area. The creation of roads may cause changes in wildlife distribution, increased access for non-aboriginal hunters and trappers/poaching until trails are reclaimed.

The loss of 1,084m³ of timber will have a longer impact of 15-20 years. The addition of 48km of new drilling trails will also have a longer term impact on wildlife and habitat features, pending reclamation.

Considerations:

The mineral drilling activity may cause some wildlife species to change their use of the area. The creation of trails may cause changes in wildlife distribution, increased access for non-aboriginal hunters and trappers/poaching until trails are reclaimed. The loss of 1,084m³ of timber will have a longer impact of 15-20 years. The addition of 48km of new drilling trails will also have a longer term impact on wildlife and habitat features, pending reclamation.

The disturbance will take place over a limited period of time. TML has indicated they will complete the majority of the proposed work activities within a 6 month period, but depending on the results of that work, may need to conduct further limited work in years 2 or 3. TML also wishes to engage with the TNG to determine if the least impactful route of access, in terms of disturbance and residual impacts on wildlife and the Tsilhqot'in's exercise of their Aboriginal rights, involves clearing and constructing trails within standing timber, or crossing open meadow areas.

Clearing small openings in mature standing timber will have some immediate impact, and some continuing impact on species dependent on mature forest cover for habitat, but can benefit other

species through provision of early seral forage vegetation in close proximity to hiding and thermal cover, and variation in stand structure. Access restrictions can be implemented to block, or deter, vehicle, ATV and hunter use of exploration trails created, and can be constructed in a manner to also provide some habitat requirements for some species.

Opportunities exist to enhance reclamation activities beyond minimum Code requirements, accelerate the restoration of disturbed areas, and maintain the integrity of the ecosystems, and may include: establishing shrubby browse species for ungulates by planting whips or waddles in moister areas; seeding herbaceous forage species for small mammals preyed upon by fisher and marten; seeding herbaceous forage species for ungulates and bears; planting 2 year old, large plug size or bare root coniferous seedlings of mixed species to accelerate the replacement of coniferous trees; creating access restrictions at the start of exploration trails and where trails intersect meadows using logs piled at least 5 m wide by 2m tall so they double as habitat corridors for fisher and marten and their prey species, and allow fisher and marten access through the snow crust to their prey species in winter; scatter coarse woody over other disturbed areas; where it is feasible to establish native forage species, limiting range seed mix application to the rates required to control erosion and noxious weeds. Enhancing reclamation activities beyond minimum Code requirements will accelerate the succession from cleared openings to an early seral forest state, and improve post- disturbance aesthetics.

Opportunities exist through minor field location and timing changes of the proposed activities to avoid or minimize some disturbance by conducting operations on dry meadows or on frozen ground and snow pack in winter, or choosing trail locations through pine beetle impacted stands to avoid mixed species old growth stands to the extent possible. Some opportunity may exist to establish traditional food or medicinal plants within the cleared openings. TML has confirmed their willingness to work with TNG representatives to identify opportunities to avoid or minimize impacts on TNG interests, including specific sites or features on the land, as TML did previously in their 2012 exploration program. In consideration of the intensive exploration history and high Tsilhqot'in values in this area, TML has confirmed their willingness to work with the TNG to re-assess reclamation work completed on previous mineral exploration disturbances in the Application area, determine the degree of wildlife forage production, wildlife capability and wildlife use, and identify whether feasible opportunities exist to further enhance forage production and wildlife capability in those areas.

File information from a previous application indicates: a Conservation Data Centre Masked Sensitive Occurrence occurs west of Fish Lake in the Taseko River Valley, the wetland and meadow complexes near Little Fish Lake may support sand hill cranes, and eagle and osprey nests may be present in the Application area.

For their 2011 Notice of Work application, TML developed Environmental Protection Management Plans (EPMPs) containing mitigating measures for: Archaeological Management for Exploration; Working In or Near Streams and Wetlands; and Sensitive Vegetation and Wildlife Habitat Features. The full EPMPs were provided to the TNG with the December 6, 2016 Initial Impacts Assessment. The EPMPs were also provided previously to the TNG and presented at a workshop in early 2012. The TNG raised no issues or concerns related to these EPMP's at that time. The principle mitigation measures incorporated in these EPMP's are equally applicable to the proposed work in this Application (2016 NOW).

Permit conditions:

I have imposed the following permit conditions:

Environmental Protection Management Plans

- a) The permittee must ensure all staff and contractors working on the exploration site area are adequately trained in the Environmental Protection and Management Plans for: Working in or Near Streams and Wetlands; Archaeological Management Plan for Exploration; and Sensitive Vegetation and Wildlife Habitat Features; the Chance Find Procedures contained within above Environmental Protection and Management Plans; and the Mine Emergency Response Plan.
- b) The permittee must ensure the Environmental Protection and Management Plans for: Working in or Near Streams and Wetlands; Archaeological Management Plan for Exploration; and Sensitive Vegetation and Wildlife Habitat Features; the Chance Find Procedures contained within above Environmental Protection and Management Plans; and the Mine Emergency Response Plan are implemented for the exploration program.

Assessments, Prescriptions, Notification and Access Restrictions

- c) The permittee must hire or contract a qualified cultural heritage monitor, with preference given to a qualified cultural heritage monitor nominated by the TNG should the TNG choose to nominate one, to conduct a cultural heritage assessment of all areas proposed for mechanical disturbance prior to disturbance.
- d) The permittee must hire or contract a qualified wildlife specialist with knowledge of the TNG's traditional food and medicine plants, with preference given to a qualified wildlife specialist nominated by the TNG should the TNG choose to nominate one, to develop reclamation prescription recommendations for the permittee's consideration and implementation for all newly disturbed areas where practicable.
- e) The permittee must notify the TNG on a weekly basis of the work completed within the last one week period, and the work planned for the upcoming two week period.
- f) In determining and implementing signage and access restrictions to ensure public and worker safety during the exploration program as required under the Code, the permittee must ensure the Mine Manager also gives consideration to the Tsilhqot'in's practice of their Aboriginal rights.

Minimizing Disturbance and Care in Construction

- g) The permittee must make all reasonable efforts to consult with the TNG and reach agreement on the preferred, and least impactful, route of access where options exist to locate trails either within standing timber or across open meadows.
- h) The permittee must utilize existing access or previously reclaimed access wherever possible, and locate new trails on gentle gradient slopes wherever possible, to minimize disturbance of the terrain and soils.
- i) For access trails that do require construction, the permittee must construct them with care, avoid grubbing, grading and blading wherever possible, and construct trails to the minimum dimensions required to meet operational and safety requirements.

- j) On exploration trails where heavier traffic will occur, the permittee must strip, salvage and windrow organic materials, and replace it when activities are completed.
- k) The permittee must locate new disturbances through pine-dominated forest and avoid clearing old forest of mixed species, wherever feasible.
- l) The permittee must ensure drill site, trench/test pit, and borrow site clearing is to the minimum amount of timber removal and disturbance required to meet operational and safety requirements.
- m) The permittee must carry out activities in a manner which minimizes soil loss, and must carry out progressive reclamation at all times subject to weather conditions.

Reclamation, Revegetation, Wildlife Forage, Wildlife Habitat Elements and Vehicle Access

- n) The permittee must retain potential furbearer denning trees wherever possible. Denning trees are cottonwood ≥ 90 cm diameter breast height, aspen ≥ 40 cm diameter breast height and lodgepole pine ≥ 35 cm diameter breast height.
- o) The permittee must retain furbearer forage areas of advanced coniferous regeneration and shrub understory wherever possible.
- p) The permittee must rip or otherwise de-compact all compacted surfaces.
- q) The permittee must retain or place >25 m³/ha of elevated coarse woody debris >20 cm diameter across all disturbance areas where sufficient coarse woody debris is available.
- r) The permittee must establish coarse woody debris piles ≥ 5 m across and ≥ 2 m high across the entrances of all exploration trails, and where exploration trails intersect meadows, where sufficient coarse woody debris is available.
- s) The permittee must revegetate all disturbed areas with natural wildlife forage species wherever possible, and must use forestry range agronomic mix only to the degree necessary to control noxious weeds or erosion, or where no natural revegetation option is available.
- t) The permittee must re-establish mixed coniferous species in all disturbed areas suitable for coniferous species utilizing ≥ 2 year old, bare root or large plug size seedlings.
- u) The permittee must immediately backfill test pits upon completion of geological mapping and sampling, replace organics, salvaged vegetation, and coarse woody debris, and revegetate.
- v) The permittee must reclaim drill sites by re-contouring as required, replacing topsoil, organics, salvaged vegetation and coarse woody debris, and revegetating prior to the completion of the site investigation program.
- w) The permittee must provide all disturbed exploration trails roads with appropriate drainage structures including water bars.

- x) The permittee must fully deactivate all new and reactivated exploration trail disturbances at the end of the multi-year work program.
- y) The permittee must reclaim exploration trails by pulling back any side cast material, re-contouring as required, replacing topsoil, organics, salvaged vegetation and coarse woody debris, and revegetating.

Wildlife Protection

- z) The permittee must plan activities to minimize mechanical disturbance during spring moose calving season.
- aa) During the spring and summer, the permittee must ensure that all helicopter activity related to this Notice of Work is confined to Fish Creek Valley, and away from the Taseko River Valley and west-facing bluffs.
- bb) The permittee must report all crane or crane nest observations to MFLNRO Wildlife staff and cease work in those immediate areas if cranes are noted. If sand hill cranes are confirmed to be nesting in the wetlands, the permittee must cease drilling activity within 500 m of the wetland nesting areas until August 1st or until after cranes have left the area.
- cc) The permittee must review wildlife-specific inventory information, particularly for bald eagle and osprey nests, to ensure these nests and other significant wildlife habitat features are not disturbed or destroyed, and record and report any new significant wildlife habitat features or species at risk identified to MFLNRO Wildlife staff if observed.

TNG Concern:

2. *The island in Fish Lake is used for ceremonial/spiritual activities. The TN currently uses this area to transfer knowledge to their youth about hunting and other cultural activities.*

Considerations:

No exploration activities are planned for the island in Fish Lake. TML has confirmed their willingness to work with TNG representatives to identify opportunities to avoid or minimize impacts on TNG interests, including specific sites or features on the land, as they did previously in their 2012 exploration program.

Permit conditions:

I have imposed conditions e) and f) as identified in the discussion of TNG Concern #1 above and I have also imposed the following additional permit condition:

Consideration for Cultural Gatherings

- dd) Upon receipt of at least 2 weeks notice from the TNG of the location(s) and timing of their two significant cultural gatherings planned for the summer, and their healing camp in the fall, the permittee must avoid operating heavy equipment within 500 m of the gathering site(s) for a period of up to 3days, or other time period and setback distance as may be agreed to by TML with the TNG.

TNG Concern:

3. *Teztan Biny has become more culturally important as other areas are alienated and developed. During the Federal Review Panel, the TN stated that displacement from ability to exercise rights in these areas is aggravated by:*
- 1) loss of key cultural hunting and trapping areas,*
 - 2) severing of centuries old connection to the land,*
 - 3) the acknowledged fact of the economic, cultural and spiritual significance of the area,*
 - 4) the scale of environmental destruction,*
 - 5) the broader adverse impacts on wildlife populations that support the TN, and*
 - 6) the broader adverse impacts on an ancient and enduring hunt and trapping and trapping pattern of the TN people for which Teztan Biny area serves as the hub*

Considerations:

I reiterate my considerations as set out in the discussion of TNG Concern #1 above.

The declared Title Area, nearby Provincial Parks, and Proven Rights Area outside of the Application area are relatively pristine, have high wildlife values, remain available for hunting and trapping, and were historically used for cultural purposes.

Additionally on June 23, 2017 the Ministry of Aboriginal Relations and Reconciliation extended an offer to provide \$50,000 to be used for the support of cultural initiatives within Tsilhqot'in territory, as further accommodation to the TNG if the Application was approved. This financial contribution is intended to address potential adverse effects of the Application on the Tsilhqot'in Nation's Aboriginal rights in that area, and support the ongoing preservation, enhancement and sustenance of Tsilhqot'in cultural and spiritual practices across the Tsilhqot'in territory. On June 29, 2017, the TNG responded by indicating that "Money offers no compensation for the serious cultural, emotional and spiritual impacts that this drilling program means for our people."

TML has indicated they remain open to discussion of further accommodation measures in this regard, if and when the TNG is willing to engage in those discussions with them.

Permit Conditions:

I have imposed the permit conditions as set out in the discussion of TNG Concern #1 above.

TNG Concern:

4. *TNG have indicated that there is extensive, multi-seasonal use of the area by much of the TN population including for hunting and trapping activities.*

They are concerned that the 2016 NOW (the Application) may impact wildlife in the following ways:

- Increased human-wildlife contact,*
- Increased access (ATV trails), more potential for collisions, increased access for non-aboriginal hunters and trappers,*
- Impacts to wildlife abundance, diversity and habitat, which are linked to the proven aboriginal right to hunt and trap due to the increased access and harvesting of timber*
- Impacts to hunting and trapping opportunities (spatially and temporally during operations),*
- Impacts from noise,*

- *Impacts from altered water resources and riparian zones,*
- *If there is mineral drilling activity near riparian areas, sedimentation may affect water quality, and*
- *There may be some decreased access to the mineral drilling area during times of industrial activity, for everyone's safety.*

Considerations:

I reiterate my considerations as set out in the discussion of TNG Concern #1 above.

Permit Conditions:

I have imposed the permit conditions as set out in the discussion of TNG Concern #1 above. In regard to the concerns of potential impacts on water and riparian areas, I have imposed the following additional permit conditions:

Water and Riparian Protection

- ee) The permittee must ensure that an emergency spill kit is available on site at all time of operations that is of suitable size to account for the volume of hydrocarbons on site. The permittee must ensure that all employees are trained in its use.
- ff) The permittee must design the pump setups to capture hydrocarbon drips/leaks and prevent their release to the environment. The permittee must utilize a two-walled fuel tank, or secondary containment designed to capture 110% of fuel tank contents for pump fuel tanks.
- gg) The permittee must utilize two-walled fuel tanks, or secondary containment designed to capture 110% of fuel tank contents, at all fuel storage sites.
- hh) The permittee must contain and/or treat sediment contaminated water caused by any operation prior to discharge into any watercourse to ensure that there is no deposit of sediment, or any other deleterious substance, into any creek or its tributaries.
- ii) The permittee must design and install all stream crossings to meet the minimum design peak flows identified within the Handbook for Mineral and Coal Exploration and Coal Exploration in British Columbia.
- jj) The permittee must seal or grout all drill holes to prevent the discharge of water and/or potential contamination of groundwater upon completion, unless the drill holes will be used as sampling or monitoring wells.

TNG Concern:

5. *This area is important to the TN for hunting, and has social, cultural and spiritual significance for the community.*

Considerations:

I reiterate my considerations as set out in the discussion of TNG Concern #1 and #3 above.

Permit Conditions:

I have imposed the permit conditions as set out in the discussion of TNG Concern #1 above.

TNG Concern:

6. *It is noted that the project area has been disturbed by previous mineral drilling activity. The Province has not considered Justice Grauer's comment in Taseko Mines Limited v. Phillips, 2011 BCSC 1675 at para. 65:*

Each new incursion serves only to narrow further the habitat left to them in which to exercise their traditional rights. Consequently, each new incursion becomes more significant than the last. Each newly cleared trail remains a scar, for although reclamation is required, restoration is impossible. The damage is irreparable. It follows that if only a portion of the proposed new clearings and trails prove to be unnecessary, the preservation of that portion is vital.

Discussion:

I reiterate my considerations as set out in the discussion of TNG Concern #1 above.

Permit Conditions:

I have imposed the permit conditions as set out in the discussion of TNG Concern #1 above.

TNG Concern:

7. *TN community members exercising Aboriginal Interests in this area may be impacted by noise, industrial activity, and dust which will cause adverse impacts to the Tsilhqot'in community members who traditionally hunt in the area over the next 3 years, depending on how close they are to the drilling area. Visual quality may also be impacted by the activity, as there are trees that will be cut and access trails that will be created and brushed. It is understood that the loss of trees and the increased access resulting from the 2016 NOW activities will significantly impact TN's use and enjoyment of the area and may result in the TN choosing to avoid the area entirely until the work is done. It is also understood that given the unique and special significance of this area to the TN, the proposed exploration work can be disruptive and may have significant emotional impacts such as TN members avoiding use of this area for hunting and trapping activities during an active drilling program.*

Considerations:

I reiterate my considerations as set out in the discussion of TNG Concern #1, #2 and #3 above.

Permit Conditions:

I have imposed the permit conditions as set out in the discussion of TNG Concern #1 and #2 above.

TNG Concern:

8. *The moose population in the Cariboo-Chilcotin Natural Resource District has declined substantially from the early 2000's to early 2010's. This 2016 NOW project may impact moose populations by increasing access to the area, and reducing thermal cover through the removal of 1,084 m3 of timber.*

The TN has raised impacts about increased non-First Nations hunter access to the area.

Considerations:

I reiterate my considerations as set out in the discussion of TNG Concern #1 above.

The Application involves no new major roads or major road systems. Major road systems have been identified as a probable significant contributor to the moose population decline.

There are multiple regional projects underway to address the depressed moose population, including reductions in Limited Entry Hunting (LEH) authorizations, the initiation of a research

project focused on better understanding the factors contributing to moose mortality, the South Chilcotin Stewardship Plan, and ongoing Fish and Wildlife Panel work focusing on moose recovery strategies that includes TNG and Provincial representatives.

The Province has reduced the number of LEH permits issued for moose in the South Chilcotin from 600 in 2011 to 297 in 2016. Since January 2014, provincial staff have radio-collared and monitored a total of 65 adult cow moose within the Big Creek area (maintaining a minimum of 30 cows monitored per year). Investigations of the mortalities of radio-collared moose, in collaboration with the TNG, have provided valuable insights regarding population dynamics and the primary factors that contribute to moose mortality in the Chilcotin, and will be part of a larger dataset to examine landscape-level factors that affect moose vulnerability provincially. The TNG have ongoing involvement in the study, and updated results are generally presented to First Nations once the report is finalized annually. A recent moose survey conducted in the South Chilcotin has found a significant increase in the moose population (+57%) from 2012 to 2017. The recent survey results suggest that collaborative moose recovery efforts are positively affecting Chilcotin moose populations.

As a result of the collaborative efforts of the TNG and the Province on the South Chilcotin Planning Process the Province has committed to provide \$200,000 to the TNG for the development of a Moose Management plan, which may include road deactivation prescriptions, plans and completion of the works under the approved management plan. The Province has provided the TNG with an inventory of non-status roads to review and develop their priority areas that they would like to see deactivated and build a plan around.

The TNG is also engaged in other collaborative wildlife initiatives with MFLNRO Fish and Wildlife staff through the provisions of the Tsilhqot'in Stewardship Agreement.

Permit Conditions:

I have imposed the permit conditions as set out in the discussion of TNG Concern #1 above.

TNG Concern:

9. *Rainbow Trout are present in Fish Lake and Little Fish Lake, Middle and Upper Fish Creek, and in several other reaches of tributaries to Fish Creek and Fish Lake. Salmon are harvested from the Taseko River, which is west of the mineral drilling tenure footprint. Wetlands mainly consist of fens and herbaceous meadows. Fens are either dominated by sedges or by willows and scrub birch with moderate covers of brown mosses. Herbaceous meadows and shrub-carrs are less common than fens but dominate fluvial plains that feed and drain Fish Lake. For instance, rich meadows with various flowering herbs, sedges and willow species are common adjacent to fluvial channels to the north and south of Fish Lake. The stream crossings that have been proposed may cause sedimentation.*

Considerations:

The Tsilhqot'in use Fish Lake, Little Fish Lake, and Big Onion Lake for trout fishing. They use the Taseko River for salmon fishing. The area is important to the Tsilhqot'in for fishing, as well as its social, cultural and spiritual significance. Fish Lake and Little Fish Lake are adjacent to the mineral drilling activity, but should remain open to the Tsilhqot'in for fishing. Access trails, visual quality, and industrial activity (noise and dust) may impact the Tsilhqot'in's fishing activities. The TNG have stated the impact of the proposed camp will be more significant if camp location A on the north shores of Teztan Biny is approved.

Permit Conditions:

I have imposed the permit conditions as set out in the discussion of TNG Concern #4 above. In addition, I have imposed the following permit condition:

Camp Location

kk) The permittee must establish the camp in proposed location B.

TNG Concern:

10. *The drilling area contains one ecological community of conservation concern (i.e. rare plant ecosystem), the lodgepole pine-trapper's tea-crowberry unit, which is in the vicinity of the drilling activities. Three rare plants are found in the area: Bird's foot buttercup (Ranunculus pedatifidus spp. Affinis), Schistidium heterophyllum, and Drepanocladus longifolius. The provincially blue-listed Bird's foot buttercup is associated with the herbaceous meadow ecosystem (Taseko Mines Ltd., 2011).*

Considerations:

It is not confirmed whether the Tsilhqot'in harvests these plants as part of its traditional harvesting activities in the area. Potential effects of the drilling activity may include damage to the vegetation and soil caused by removal of vegetation and soil for drilling and test trenches/pits, the removal of timber over storey and soil disturbance to create access trails. The drilling activity may cause some disruption to Tsilhqot'in gathering activities traditionally carried out within the tenure boundary. The Application area is important to the Tsilhqot'in for gathering, and has social, cultural and spiritual significance for the community.

The potential impacts on the Tsilhqot'in's ability to gather in the area are limited to the duration and disturbance area of the Application. There may be some inconvenience due to the industrial activity, however the impact is temporary – the work program is expected to be substantially completed within 6 months, with the possibility of lesser activity levels continuing into years 2 or 3, and the area is required to be reclaimed.

TML's Environmental Protection and Management Plan states comprehensive wetland surveys, terrestrial ecosystem mapping, and rare plant surveys have been conducted in the area in a comprehensive manner. Plant communities of concern have been mapped and identified. When drilling trails require field fitting, TML has committed that drilling staff will use the mapping and specific coordinates of rare plant sites to avoid disturbance. When near to proposed drilling activities, these sites will be flagged by field staff to avoid disturbance.

Permit Conditions:

I impose permit conditions a), b), c) and d) as set out in the discussion of TNG Concern #1 above.

TNG Concern:

11. *The project area includes archaeological sites, both known and unknown. Drilling activities are planned to occur in areas with moderate and high Archaeological potential and in and around registered sites. Archaeological resources may be unknowingly disturbed in this area if industrial activity, particularly mining activity, is permitted in the Fish Lake area.*

Considerations:

Archaeological sites are protected under the *Heritage Conservation Act*. TML states appropriate archaeological investigations/work, as determined by a qualified professional archaeologist, have been conducted to ensure the approved work will not impact identified archaeological resources.

Permit Condition:

I have imposed permit condition a) and b) as set out in the discussion of TNG Concern #1 above.

TNG Concern:

12. Many of the TN community members consider this area their home. They have shared experiences of growing up and learning to fish, hunt, gather and spend time with their relatives there. There will be direct overlap of the areas used by the TN now and in the past and the area the proponent wishes to drill/explore.

Considerations:

I acknowledge that many Tsilhqot'in community members consider this area their home, and this was further communicated in the Elders' statements and accompanying photographs showing historic cabins used by their families, as well as recently constructed cabins in the area. In the Application, TML proposes only one test pit in close proximity to the historic and recently constructed cabins in the clearing on the east side of Little Fish Lake, and that test pit is located on an existing trail.

I reiterate my considerations as set out in the discussion of TNG Concern #1 and #3 above.

Permit Condition:

I have imposed permit conditions as set out in the discussion of TNG Concern #1 above.

TNG Concern:

13. The TN uses the Fish Lake and the island in Fish Lake for ceremonial/spiritual practices. Present-day and previous generations of Tsilhqot'in people have conducted rituals to receive their spiritual powers. The TN is understood to hold a significant spiritual and emotional attachment to this specific area, and identifies it as an area of particular significance. The 2016 NOW is located adjacent to Fish Lake. The TN uses this area to transfer knowledge to their youth about gathering as well as other cultural activities. The use and access to this area for spiritual/cultural activities may be limited during the 3 year term by this mineral drilling activity.

Considerations:

I reiterate my considerations in the discussion of TNG Concern #3 above. In addition, I acknowledge that for the TNG the Teztan Biny and Nabas areas are places of unique and special significance for the Tsilhqot'in cultural identity and heritage. This is reflected in the Impacts Assessment, in the consideration of the social, cultural, experiential component of the various Aboriginal Interests.

I have considered the spiritual significance of the Fish Lake area (especially the island in Fish Lake), from the perspective of the TNG as expressed to me during the consultation process, as well as considering the proposed activities included in the Application, duration, and potential impacts and accommodations which may be appropriate to address such impacts. In particular, I

have considered the types of activities related to the Application and how they may impact cultural heritage resources, archaeological values, and the spiritual significance of the area to the Tsilhqot'in. With respect to the proposed drilling activities, and the proposed 50-man camp, although they are located >0.5 km from the island in Fish Lake, given the cultural and spiritual significance of this area to the Tsilhqot'in, I understand that there may be serious potential adverse impacts from the Application. Considering this in conjunction with the preliminary assessment of a strong *prima facie* claim to an Aboriginal right to practice ceremonial/spiritual activities in this area, it has led to consultation with the TNG being conducted at the deep end of the *Haida* consultation spectrum in regard to this Application, in addition to specific considerations as to what accommodations may be appropriate.

The Application, however, proposes no disturbance activities for the island in Fish Lake, nor in Fish Lake itself. The Application proposes a maximum of 3 years of activities, and most activities will be conducted within 6 months.

During the consultation process the TNG identified two significant cultural gatherings which would take place this summer, and a healing camp later in the fall. I encourage the TNG to communicate the details of these significant planned cultural gatherings as least 2 weeks in advance of such events to TML, including the specific locations, so that TML can incorporate dates for these gatherings into their work plans to avoid or minimize any disruption to these events.

Permit conditions:

I have imposed permit conditions e) and f) as set out in the discussion of TNG Concern #1 above, and permit condition dd) as set out in the discussion of TNG Concern #2 above.

TNG Concern:

14. Concerns regarding the cumulative effects of access trails and previously un-reclaimed activity.

Considerations:

The 2.18 hectares of disturbance that remains un-reclaimed from a previous work program are access trails that TML intends to re-use. All other test pit sites, drill sites, sumps and short trail spurs to test site locations have been reclaimed in accordance with Health, Safety and Reclamation Code for Mines in BC (Wassenaar, Letter, September 22, 2011).

The Application is planned over 3 years, with most of the work occurring within a 6 month period, and the reclamation planned for the first year is 20 hectares. The reclamation program as presented in the Application indicates:

- Test pits will be immediately backfilled and have organics and woody debris placed on the site
- Drill sites will be reclaimed as drilling at each site is completed and prior to the completion of the site investigation program.
- All areas will be re-seeded with an approved forestry mix.
- Access routes will be reclaimed by pulling back any side cast material, re-contouring as Required, top-dressing with available topsoil and woody debris.

In addition to the above, I reiterate my comments as stated in the discussion of TNG Concern #1 above.

Permit Conditions:

I have imposed permit conditions as set out in the discussion of TNG Concern #1 above.

TNG Concern:

15. Request by Tsilhqot'in legal counsel, Jay Nelson, that if a Mines Act permit is issued against the TNG's objections, that a clause be included prohibiting TML from conducting any work within 30 days to enable the TNG to submit their application for a Judicial Review and/or injunction, and to avoid any potential risk of civil unrest by Tsilhqot'in members upset by the permit decision.

Considerations:

I have considered this request, along with the following:

- TML's statements that they have avoided commencing any survey or assessment work in the area to avoid upsetting any Tsilhqot'in members prior to a permit decision being made;
- TML's estimate that they will need to conduct about 2 weeks of that survey and assessment work prior to doing any mechanical work;
- TML's mining lease requirement to provide First Nations notice of at least 14 days prior to commencing work and TML's voluntary commitment to provide the same notice for any work in areas outside of the mining lease area;
- The length of the consultation period which has elapsed; and
- The likely timeline required for TML to meet permit conditions c) and d) in #1 above.

In consideration of the above, I do not find it reasonable nor necessary to include a permit condition prohibiting commencement of work for 30 days after the issuance of the permit.

I respectfully suggest TML develop a communication strategy or protocol with the Tsilhqot'in leadership to first avoid issues, manage any issues which may arise, and seek to ensure the safety of TNG members, TML or contract workers, and the general public at the exploration site.

Permit Conditions:

I have imposed permit conditions c), d) and e) as set out in the discussion of TNG Concern #1 above.

TNG Concern:

16. Tsilhqot'in members unwilling to trap while exploration activities are underway as the animals will leave, and for fear their traps will be damaged by heavy equipment.

Considerations:

Animals may be temporarily displaced from areas while equipment is operating. The majority of the work will be completed within a relatively short 6 month period, with some lesser amount of work possibly continuing into year 2 or 3. The work activities occur within an Application area of 3,067 ha, which is roughly 11 km long by 2.5 km wide. Opportunities for trapping will remain within the Application area outside of areas where equipment is operating. The disturbed areas are required to be reclaimed with consideration given to the habitat requirements of species the Tsilhqot'in hunt and trap. Risk of damage to traps can be averted through the notice provision condition required of TML.

Permit Conditions:

I have imposed permit conditions e) and f) as set out in the discussion of TNG Concern #1 above.

TNG Concern:

17. If the project were to become a major mine, Tsilhqot'in members would will be unable to practice their hunting and trapping rights for the 20 year life of mine.

Discussion:

The information provided below to the TNG is primarily for information purposes only, as this issue is not directly engaged in my statutory decision on this Application.

Very few operating major mines have no-shooting areas established under the *Wildlife Act*, as noted in the 2016 – 2018 Hunting & Trapping Regulations Synopsis. There is no *Mines Act* or Code requirement for the establishment of no-shooting areas over operating major mines – only the requirements under 1.3.1, 1.3.2, and 1.3.3 of the Code regarding Mine Manager control of access to ensure public and worker safety at mine sites. I spoke with Ted Zimmerman, Director of Resource Management, MFLNRO. He indicated that while some no-shooting areas appear to have been established previously under the *Wildlife Act* for public safety, or other reasons, their current practice is that no-shooting and no-hunting areas are now established under the *Wildlife Act* only for wildlife species conservation concerns.

Of further interest for the TNG, is the Superintendent of Environment and Community Affairs at Teck's Highland Valley Copper Mine has advised their company has an agreement with local First Nations to allow a First Nations' only deer hunting season on reclaimed areas of their mine site in areas where the deer presence is very high and mine workers would not be exposed to any danger from hunting activities. This area remains a no-shooting area under the *Wildlife Act* for non-First Nations hunters. He further advised that one of Teck's coal mines in the Kootenays has a similar agreement with local First Nations.

I am not relying on the above information in making my statutory decision, as I acknowledge they relate to a different company and different mine sites, and the probability of a major mine in the Application area remains speculative. The examples are merely to illustrate the Mine Manager is responsible for ensuring safety at the mine site, and under some circumstances agreements may be negotiated between a First Nation and a Mine Manager which allow for the practice of Aboriginal rights on the inactive, reclaimed portions of a mine site and where no safety hazards to workers would result.

OPPORTUNITIES FOR TSILHQOT'IN INVOLVEMENT IN THE WORK PROGRAM

As outlined in TML's First Nations' Engagement Record submitted with the Application, since mid-July 2016, TML has offered to meet with the TNG to discuss the 2016 Application. TML has indicated that it remains committed to engaging First Nations on various aspects of the proposed work including access trail planning and review of environmental management plans in order to minimize potential effects on Aboriginal Interests, and regarding participation in the field program.

TML has indicated that similar arrangements to those agreed to for the 2011 NOW could occur for the 2016 Application, in relation to employing two TNG environmental monitors and a professional biologist working on behalf of TNG.

TML indicated that at the request of TNG, it hauled water from Taseko River for the 2011 NOW drilling program, which it is prepared to do again for the 2016 Application, along with monitoring sumps, and implementing sediment control measures. These measures can be monitored by TNG's environmental monitors and professional biologist.

TML has indicated that it is committed to providing similar opportunities for contracting, monitoring and reclamation work as was provided in relation to the 2011 NOW.

TML has also indicated its willingness to consider additional measures or projects that could accommodate the impacts to Tsilhqot'in, similar to its willingness to facilitate the hauling of merchantable timber for Tsilhqot'in use from the program area to the 4500 Road in relation to the 2011 NOW.

CONCLUSION

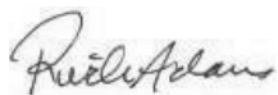
In making my decision on the permit amendment, I have considered all of the relevant facts and concerns raised by the TNG during the consultation process, even if they are not specifically identified in these reasons for decision. I have also considered advice from MFLNRO First Nations' Relations staff in reaching my decision.

After review and consideration of the available information, I am satisfied that the consultation has been meaningful and adequate and the proposed mitigation and accommodation measures appropriately address the concerns identified by the TNG with respect to impacts to their Aboriginal rights and interests.

I have attempted in my decision-making to reasonably balance the impacts and key concerns expressed by the TNG representatives with other societal values.

For the reasons noted above and having regard to my responsibility as an Inspector of Mines with delegated authority under the *Mines Act*, I have made a decision to amend *Mines Act* permit (the Permit) MX-3-131 and have issued an authorization for Taseko Mines Limited to conduct detailed site investigation activities as described in the Notice of Work applications #0300150201601, dated October 17, 2016, subject to the specified conditions.

Sincerely,



Rick Adams
Senior Inspector of Mines - Permitting

Encl: Appendix 1 Delegation of Chief Inspector's Authority Under the Mines Act – Section 10
Appendix 2 Partial Summary of Documents I Have Considered in Making My Decision



Sensitive Vegetation & Wildlife Habitat Features

Taseko Mines Limited

DOCUMENT #	
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June 2017

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1.0 Purpose

This Environmental Protection and Management Plan (EPMP) is intended for exploration works through and around old forest, wetlands, communities of concern and rare plants, wildlife and wildlife features. This EPMP will provide a guide for exploration crews, supervisors and management, and will be referred to during work planning and operations when decisions are required regarding work locations and methods.

This EPMP is to ensure no eggs or birds occupying nests, or no nests of eagles, peregrine falcons, gyrfalcon, osprey, heron or burrowing owls, are impacted from exploration activities, as per Section 34 of the BC Wildlife Act that provides year-round protection to birds' nests:

A person commits an offence if the person, except as provided by regulation, possesses, takes, injures, molests or destroys

(a) a bird or its egg,

(b) the nest of an eagle, peregrine falcon, gyrfalcon, osprey, heron or burrowing owl, or

(c) the nest of a bird not referred to in paragraph (b) when the nest is occupied by a bird or its egg.

If you wish to remove or modify nest trees, you must seek permission and obtain a written permit from the Ministry of Environment's Permit & Authorization Service Bureau AND you should check with Environment Canada to see if a federal permit is required under the Migratory Birds Convention Act regulations.

This Environmental Protection and Management Plan (EPMP) is designed to meet the following goals:

- Minimize disturbance caused by exploration activities,
- Avoid any long-duration or irreversible impacts or changes on old forest, wetlands, rare plants and communities, and wildlife habitat, in order to avoid cumulative effects when considered along with other non-related activities in the area, and to avoid infringement on established Aboriginal rights;
- Manage all activities within sensitive vegetation and wildlife areas to maintain the integrity of the ecosystems and their values,
- Minimize effects on wildlife and humans as a result of any temporary changes in ecosystems,
- Comply with provincial and federal legislation and regulations.

2.0 Existing Environment

2.1 Forests

The area is within the MSxv and SBPSxc biogeolimatic zones and is dominated by lodge-pole pine. Due to mountain pine beetle, timber harvesting, exploration, forest fires and road building in the area, the landscape is a mix of old forest and immature stands. Wildlife values for some species, such as fisher, are high in the old forest areas. The immature forest stands provide forage and browse for wildlife and cattle. Cultural use values of balsam trees and trappers tea are high in the MSxv zone.

2.2 Wetlands

Wetland surveys have been conducted in the area in a comprehensive manner. Wetlands mainly consist of fens and herbaceous meadows. Fens are either dominated by sedges or by willows and scrub birch with moderate covers of brown mosses. Herbaceous meadows and shrub-carrs are less common than fens but dominate fluvial plains that feed and drain Fish Lake. For instance, rich meadows with various flowering herbs, sedges and willow species are common adjacent to fluvial channels to the north and south of Fish Lake.

2.3 Communities of Concern and Rare Plants

Terrestrial ecosystem mapping and reconnaissance level rare plant surveys have been completed throughout the area.

The exploration area contains one ecological community of conservation concern (i.e. rare plant ecosystem), the lodgepole pine - trapper's tea - crowberry unit (MSxv/05), which is in the vicinity of the exploration activities and Figure 2 outlines its distribution.

Three rare plants are found in the area:

- Bird's foot buttercup (*Ranunculus pedatifidus* spp. *affinis*)
- *Schistidium heterophyllum*
- *Drepanocladus longifolius*.

The provincially blue-listed Bird's foot buttercup (*Ranunculus pedatifidus* spp. *affinis*) is associated with the herbaceous meadow ecosystem.

2.4 Wildlife

Various wildlife research and inventory projects have been conducted in the area including wildlife habitat ratings, various species surveys (i.e. raptor, bat, ungulate, etc.), and habitat availability and suitability mapping. Wildlife features throughout the area were identified during baseline data surveys in the mid-1990's.

Specific wildlife features may include but are not limited to:

- A significant mineral lick,
- A nest of a bald eagle, osprey, great blue heron, or a category of species at risk that is limited to birds,
- A hibernaculum or maternity roost used by bats,
- A ground den of a grizzly bear,
- A hot spring or thermal spring,
- A non-classified wetland or ephemeral pond associated with a species at risk.

3.0 Management Plan Guidelines

3.1 General Best Practices

- Clearing of native vegetation and topsoil will be minimized as to lessen the impacts on vegetation and wildlife habitat in general. Specific efforts will be made to try to avoid removing larger trees that can provide habitat to species dependent upon old-growth forest.
- Exploration work will be planned to utilize existing access or open areas (i.e. wetlands when frozen) wherever possible to minimize new disturbance and clearing of forested habitat.
- Access trails that do require construction will be done so with care; avoiding grubbing, grading and blading whenever possible.
- Equipment will be clean prior to being brought on site and will be inspected prior to the start of work to prevent the introduction and spread of invasive species.

3.2 Protection of Wetlands

- Whenever possible, travel through and work in wetlands will occur during winter months when soils are frozen.
- Work on test sites in wetland areas will include removing surficial humus layer and vegetative mat with topsoil separately from subsoil and deeper overburden materials such that these three resources can be replaced in sequence to facilitate natural restoration.
- During spring, summer and fall seasons, travel through and work in wetlands will be avoided. Table 1 outlines the buffer zones for working in and around wetlands and will be adhered to wherever possible; however, wetland complexes may require some small sections of trails and roads to be within stated setbacks.

Table 1 – Riparian Management Areas (RMA): Setback Distance
(from the Health, Safety and Reclamation Code for Mines in British Columbia)

Riparian Type		Setback from Top-of-Bank (m)	
		Drilling	Exploration Access
Wetland (area in ha)	≥ 5	10	30
	≥ 1 and < 5	10	20
	≥ 0.25 and < 1	10	10

- During drilling the following will be applied where practicable:
 - The production of excess muds, additives and process water will be limited.
 - Surface drainage structures will be designed based on the expected flow, subgrade soil conditions and the expected duration of their use. Surface drainage structures (e.g. interceptor ditches) should be constructed to intercept and divert runoff, preventing erosion of the drill pad and sump.
 - Groundwater flowing from boreholes will be prohibited from negatively affecting wetlands by impacting water quality or normal hydrologic functioning.
- During road and trail building the following will be applied where practicable:
 - Where necessary, roads constructed through wetlands will be completed with care and following the guidelines provided in the Working in or Near Streams EPMP.
 - Where the soil is fine and wet, work will be minimized and all measures will be taken to alleviate any potential for erosion or compaction.
 - If a wetland must be crossed, the route selected will minimize the area impacted by construction and operation and existing roads or trails will be used wherever possible. New crossings should be parallel to the direction of water flow to the degree practical.
 - Erosion will be minimized through erosion control measures such as cross ditching or silt fencing and other actions recommended in the Working in or near Streams and Wetlands EPMP.
 - Natural water flows will be maintained: provide cross drainage to maintain natural surface and subsurface flows.

3.3 Protection of Communities of Concern and Rare Plants

- Communities of concern have been mapped and identified. Efforts will be taken to minimize the extent of grubbing, stripping and the removal of shrubs and herbaceous species within communities of concern.
- Known rare plant locations will be mapped and avoided. When nearby to proposed exploration activities, these sites will be flagged by field staff to avoid disturbance.
- When exploration trails require field fitting, the exploration staff will use the mapping and specific coordinates of rare plant sites to avoid them.

3.4 Protection of Wildlife Habitat and Wildlife Features

- Presence and/or occupancy of bird nests for proposed disturbance areas will be assessed by a qualified biologist prior to the start of work to enable avoidance. Any other wildlife features that are observed during the bird nest survey will also be identified and recorded.

- In the event that an occupied or protected bird nest or wildlife feature is identified in the exploration area, the access trail or test site will be rerouted to avoid the identified feature.
- A 'chance-find' procedure has been developed by the qualified biologist to outline appropriate steps should an occupied or protected bird nest be identified after exploration activities are underway. The 'chance-find' procedure is attached in Appendix 1.
- Field crews will undergo training on the 'chance-find' procedure prior to work commencing to ensure they understand and are aware of the appropriate steps.

3.5 Measures for Preventing Human-Wildlife Interactions

- Preventive measures will be taken to ensure human-wildlife interactions are minimized and non-lethal whenever possible. These measures will be discussed with exploration crews and may include:
 - Firearms are prohibited except when specifically authorized;
 - No littering;
 - No feeding or harassment of wildlife;
 - No hunting or fishing on the project site;
 - Project-related traffic will be restricted wherever possible to designated access roads and trails (including ATV and snowmobiles);
 - All waste that may be an attractant to bears or other wildlife (e.g. food wastes) will be properly handled in order to eliminate the potential for bear management concerns.
- Bear Aware Training and Bear Safety information will be provided to exploration crews prior to work commencing.

3.6 Reclamation

- Reclamation will be conducted in accordance with the Health, Safety and Reclamation Code of BC.
- In areas where wetlands are disturbed, humus layers and vegetation root mats will be preserved from disturbed areas and replaced during reclamation.
- Test pit and drill pad sites will have soils replaced and be recontoured so as to be consistent with adjacent landscape and prevent erosion.
- A provincially approved seed mix of certified seed quality will be used for seeding of ground disturbances. Seed will be applied in fall or spring months.
- All-terrain vehicle (ATV) access has been identified as an issue that potentially impacts sensitive vegetation communities or wildlife habitat. Reclamation of trails will include pulling-back fallen timber and brush to minimize access to ATVs. Breaks along the trails will be provided to enable crossing by wildlife, cattle and horses.

3.7 2017 Exploration Program Considerations

The 2017 program is designed to use existing access wherever possible, and new trail access is to avoid wetlands unless ground is frozen, then access through these opens is a reasonable option to avoid forest clearing.

One community of concern is identified in the vicinity of the exploration activities and is identified in Figure 2. Crews will be made aware of this area and efforts will be made to minimize the extent of grubbing, stripping and the removal of shrubs and herbaceous species within the identified community of concern.

Three rare plant sites are identified as being relatively close to the planned work (TRP 101, TRP 105, and TRP 110) (Figure 1). Crews will be made aware of these plant locations during flagging of the proposed works, and if necessary, rare plant sites will be flagged off.

One occurrence of a mineral lick east of Fish Lake was identified in the 1990s, but will not be affected by the 2017 exploration activities (Figure 2). The presence of features in the exploration area was further documented in 2011. All wildlife features identified during the 2011 survey were compiled and mapped. See Figure 2.

Exploration and access trail sites were surveyed for the presence and occupancy of bird nests prior to clearing or disturbance.

4.0 References

Ministry of Environment. 2005. Best Management Practices for Raptor Conservation during Urban and Rural Land Development in British Columbia.

http://www.env.gov.bc.ca/wld/documents/bmp/raptor_bmp_final.pdf

Ministry of Environment. Proposed List of Wildlife Habitat Features – DRAFT

http://www.env.gov.bc.ca/wld/documents/whf/WHF_web_order.pdf

Taseko Mines Limited. 2009. Prosperity Environmental Assessment, Volume 5, Section 5.3.5: Rare Plants, page 5-146.

Taseko Mines Limited. 2009. Prosperity Environmental Assessment, Volume 5, Appendix 5-6-J Wildlife Data Report.

Wetland Stewardship Partnership Wetland Ways. 2009. Interim Guidelines for Wetland Protection and Conservation in British Columbia.

http://www.env.gov.bc.ca/wld/documents/bmp/wetlandways2009/wetlandways_docintro.html

5.0 Appendices

Appendix A – Chance-Find Procedure for Wildlife Features and Birds' Nests
New Prosperity Copper-Gold Project

Appendix B – Map of Sensitive Vegetation and Ecosystems
New Prosperity Gold-Copper Project

**Appendix A –
Chance-Find Procedure for Wildlife Features and Birds' Nests
New Prosperity Gold-Copper Project**



New Prosperity Copper-Gold Project

Chance-Find Procedure for Wildlife Features and Birds' Nests

A Chance Find Protocol provides those involved in ground disturbing activities with a framework for identifying wildlife features and nests, and assists in avoiding unforeseen disturbance to those habitat values.

This procedure provides descriptive information regarding features and nests commonly found in the region and those most likely to be encountered during the course of a specific project.

All exploration crew members directly involved in ground disturbing activities will be trained such that they are familiar with the types of nests and wildlife features present in the region of development.

Types of nests with greatest potential to be present in the exploration area:

Large stick nests of the following species have the greatest potential in the exploration area:

- Red-tailed hawk (*Buteo jamaicensis*)
- Northern goshawk (*Accipiter gentilis*)
- Osprey (*Pandion haliaetus*)
- Bald eagle (*Haliaeetus leucocephalus*)
- Great blue heron (*Ardea herodias*)

Nests of all of these species are constructed in the upper portions of the tree, usually within the part of the tree where live branches are found. Both coniferous and deciduous trees can contain a nest. The osprey prefers their nest at the top of a tree, usually a dead tree, or a tree with a dead top such that the main bole can support the nest structure. Great blue herons nests are in groups of more than one nest in a single tree; these nest groups are called a 'heronry'. Sticks larger than about 2 cm diameter constitute the bulk of the nest material in the nests of all of these species although finer material including leaves, grass or twine, can be incorporated in the inner parts of the nest.

Photographs of an example nest from each of these species follows:



Red-tailed hawk nest



Northern goshawk nest



Osprey nest



Bald eagle nest



Great blue heron nests – a 'heronry'

Two commonly seen tree features can be easily confused as bird nests, and should not be considered as such. These are:

- Squirrel nests
- Witches broom

Squirrel nests are usually lower down in the tree (bottom one-third) and are made of grasses and fine twigs.

Witches broom occurs on both lodgepole pine and spruce trees, however, are more common on spruce trees. The broom effect is created by a clustered outgrowth of fine branches as a reaction to a fungal pathogen, parasitic agent, or insect attack.

Photographs of an example of each follows:



Witches broom on a spruce tree



Squirrel nest

Types of wildlife features with the greatest potential to be present in the exploration area:

Specific wildlife features may include but are not limited to:

- A significant mineral lick,
- A nest of a bald eagle, osprey, great blue heron, or a category of species at risk that is limited to birds,
- A hibernaculum or maternity roost used by bats,
- A ground den of a grizzly bear,
- A hot spring or thermal spring,
- A non-classified wetland or ephemeral pond associated with a species at risk.

With specific regard to a bat hibernaculum, these are predominately found in secure underground sites that are less likely to be disturbed by light, noise and predators, and have the optimum humidity and stable low temperature requirements. These sites are in caves, old wells, mines, and deep rock crevices.

Maternity roosts used by bats would usually be alive or dead trees and tree stubs that have cavities that have been constructed by primary cavity excavating bird species, cracks, splits, and large trees and tree stubs where the tree bark is loose and falling off.

Three photograph examples of possible bat maternity roosts:



For photographic examples of nests of a bald eagle, osprey and great blue heron, see the previous section.

Photographs of an example of each of remaining wildlife features follows:



A significant mineral lick



A ground den of a grizzly bear



Two examples of a thermal spring



Three examples of an ephemeral pond



Three examples of a non-classifiable wetland

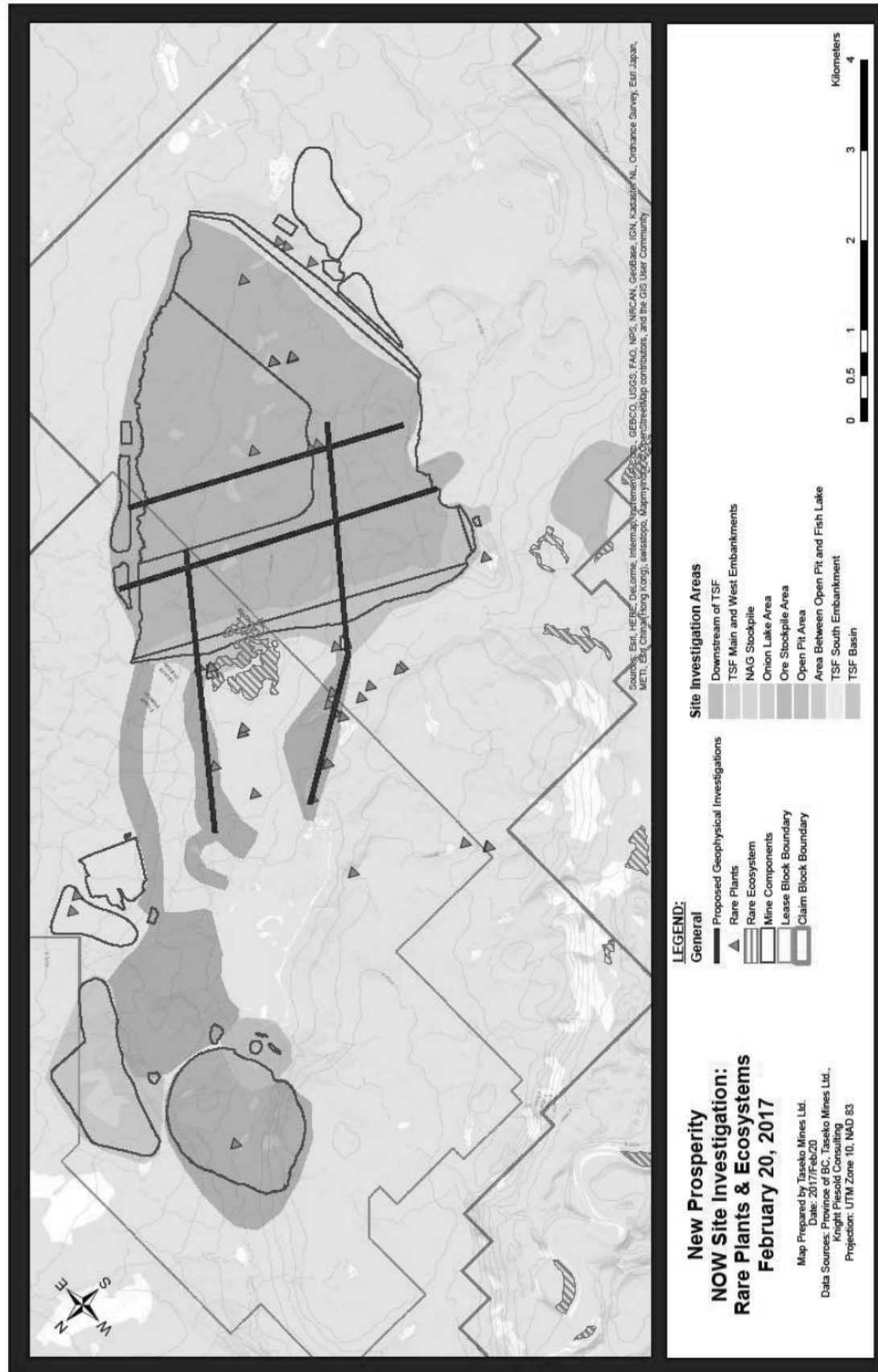
If you encounter a nest or wildlife features:

In the event that a nest or wildlife feature is encountered during the course of operations and is likely to be disturbed by planned work, the following procedure will be followed:

- Cease all forms of ground disturbance in the immediate vicinity of the find.
- Establish a protective buffer of at least 50 m surrounding the extent of the find area and demarcate the buffer in a highly visible and clear manner (e.g. 'No Work Zone' flagging)
- If possible, record GPS location of the find.
- Briefly note the type of nest or features you think you've encountered, and their location.
- Notify the Environmental Monitor or mine manager immediately to enable them to reroute or relocate the operation to ensure avoidance of the nest or feature.
- If avoidance of a nest is impractical, the mine manager will ensure a permit under the Wildlife Act is obtained prior to nest disturbance, if a permit is required.

While game trails need not be avoided by exploration, they should be noted where exploration activities cross them such that they can be considered during reclamation. Coarse woody debris pulled-back onto roads and trails to discourage ATV use should not be placed onto game trails to allow unrestricted travel by wildlife along the game trail.

**Appendix B –
Map of Sensitive Vegetation and Ecosystems
New Prosperity Gold-Copper Project**





Ministry of
Energy and Mines

July 17, 2017

File: 16475-20/0300150

Dear Chiefs:

Chief, and TNG Tribal Chair, Joe Alphonse
Tl'etinqox
PO Box 168
Alexis Creek, BC V0L 1A0

Chief, and TNG Vice-Chair, Roger William
Xeni Gwet'in First Nations Government
General Delivery
Nemiah Valley, BC V0L 1X0

Chief Ervin Charleyboy
Tsi Del Del
PO Box 69
Chilanko Forks, BC V0L 1H0

Chief Frances Laceese
Tl'esqox
PO Box 80
Riske Creek, Hwy 20, BC V0L 1T0

Chief Roy Stump
?Esdilagh
#4-9001 West Fraser Road
Quesnel, BC V2J 6R4

Chief Russell Myers Ross
Yunesit'in Government
PO Box 158
Hanceville, BC V0L 1K0

Re: Reasons For Decision

Mines Act Permit: MX-3-131

Permittee: Taseko Mines Limited

Project: New Prosperity Site Investigation Program

Notice of Work #: 0300150201601

The purpose of this letter is to notify you of my decision regarding the Taseko Mines Limited's Notice of Work Application #0300150201601 for the New Prosperity Site Investigation Program in the vicinity of Teztan Biny (Fish Lake), Yanah Biny (Little Fish Lake), and the surrounding Nabas area. This honours my commitment to provide the TNG with timely notice of my decision as I stated I would in the two face to face meetings with TNG representatives on March 28, 2017 and May 12, 2017.

My attached Reasons for Decision provides a summary of my considerations, including the Tsilhqot'in concerns raised during consultation, and mitigating or accommodating opportunities, and my decision to issue the *Mines Act* permit. My considerations and rationale are limited to the authorization issued under the *Mines Act*. I do not speak to any activities associated with the

Ministry of Forests, Lands and Natural Resource Operations consideration of the Occupant Licence to Cut application, nor to any other authorizations which may be required by TML.

Please find attached my Reasons for Decision as well as a copy of the amended *Mines Act* permit with conditions MX-3-131.

Sincerely,



Rick Adams
Senior Inspector – Permitting
South Central Region

Encl: Reasons for Decision July 14, 2017
Amended Mines Act Permit MX-3-131 July 14, 2017
Permit Cover Letter July 14, 2017
Notice of Work #0300150201601
Archaeological Management for Exploration Environmental Protection and Management Plan
Working In or Near Streams and Wetlands Environmental Protection and Management Plan
Sensitive Vegetation and Wildlife Habitat Features Environmental Protection and Management Plan
Mine Emergency Response Plan

Cc: JP Laplante, Tsilhqot'in National Government
Susan O'Sullivan, MFLNRO Williams Lake
Harold Stolar, MFLNRO Williams Lake
Kate Parsons, MEM Kamloops
Julie Chace, MEM Victoria
Al Hoffman, MEM Victoria
John McManus, Taseko Mines Limited



Working In or Near Streams and Wetlands

Taseko Mines Limited

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1.0 Purpose

This Environmental Protection and Management Plan (EPMP) is intended for works around streams, lakes and wetlands and their riparian areas.

Section 56 (2) of the BC Water Sustainability Regulation under the Water Sustainability Act exempts a person who holds a permit under section 10 of the *Mines Act* in relation to mineral exploration activities or placer mining activities until December 31, 2017 (as per order in council 895) from the requirement under section 6 (1) [use of water] of the Act to hold an authorization for the diversion and use of water for those activities.

Any activities that may cause harmful alteration, disruption or destruction of fish habitat, such as a crossing of fish-bearing waters, require referral to the Department of Fisheries and Oceans for an authorization under the Fisheries Act.

This EPMP is designed to meet the following goals:

- Minimize disturbance caused by exploration activities;
- Avoid any long-duration or irreversible impacts or changes on stream channels, water quality, aquatic ecosystems, and riparian habitat and vegetation, in order to avoid cumulative effects when considered along with other non-related activities in the area, and potential impacts on aboriginal interests;
- Manage all activities within riparian areas to maintain the integrity of the ecosystem; and,
- Prevent the introduction of deleterious substances into a stream, lake or wetland.

2.0 Existing Environment

The area contains fish bearing and non-fish bearing streams and wetlands (Figure 1).

Rainbow Trout are present in Fish Lake and Little Fish Lake; Middle and Upper Fish Creek; and in several other reaches of tributaries to Fish Creek and Fish Lake. Fish bearing waters are illustrated in Figure 1.

Wetlands mainly consist of fens and herbaceous meadows. Fens are either dominated by sedges or by willows and scrub birch with moderate covers of brown mosses. Herbaceous meadows and shrub-carrs are less common than fens but dominate fluvial plains that feed and drain Fish Lake. For instance, rich meadows with various flowering herbs, sedges and willow species are common adjacent to fluvial channels to the north and south of Fish Lake.

3.0 Management Plan Guidelines

3.1 General Best Practices

- Work will be planned to take place at times when water conditions in streams and wetlands are manageable. In the event of significant rain events during exploration, contingencies should be in place to cease work around creeks and wetlands.
- Operations will be planned to avoid streams and wetlands as much as possible.
- Table 1 below defines setback distances for Riparian Management Areas (RMA) as identified in the Health, Safety and Reclamation Code for Mines in British Columbia.

Table 1 – Riparian Management Areas (RMA): Setback Distances
(from the Health, Safety and Reclamation Code for Mines in British Columbia)

Riparian Type		Setback from Top-of-Bank (m)	
		Drilling	Exploration Access
Stream (width in m)	> 20 and <100	50	70
	>5 and ≤20	30	50
	≥1.5 and ≤5	20	40
	< 1.5	5	30
	> 3	5	15
No fish	≤ 3	5	15
Wetland (area in ha)	≥ 5	10	30
	≥ 1 and <5	10	20
	≥ 0.25 and < 1	10	10
Lake		10	30

- As per Section 9.5.1 of the Health, Safety and Reclamation Code, some activities may be carried out within RMA setbacks. These activities include: construction, maintenance, deactivation and reclamation of stream crossings; access to set up and service water supply pumps and lines; and access to drill sites. Where works within RMA's cannot be avoided, practices outlined in Section 3.2 - Stream Crossings and Works within RMA's and Section 3.4 - Vegetation Removal should be followed.

3.2 Stream Crossings and Works within an RMA

3.2.1 General Measures

- In accordance with Section 9.10.1 of the Health, Safety and Reclamation Code:
 - (1) The construction, maintenance, deactivation and reclamation of exploration access and bridges or any other form of a stream, lake or wetland crossing shall result in exploration access and crossings that are stable, safe for the intended use and which
 - a. Minimize erosion, mass wasting or the degradation of a stream, lake or wetland by the introduction of sediment, debris or deleterious matter,
 - b. Minimize adverse impacts on stream channels
 - c. Make provision for drainage system that maintain stability of the road prism,
 - d. Do not cause harmful alteration, damage or destruction of fish habitat and,
 - e. Has the minimum surface disturbance necessary to complete the proposed work.
 - (8) Stream crossings shall be constructed, maintained, deactivated and reclaimed in a manner that allows safe fish passage and protects fish at, above and below stream crossings.
 - (9) Stream crossing on streams that do not contain fish shall be constructed, maintained, deactivated and reclaimed in a manner that does not adversely affect downstream fish values.
- Unless authorized, in accordance with the Fisheries Act, crossings must not cause:
 - Obstruction of fish migration;
 - Destruction of fish;
 - Harmful alteration, disruption, or destruction (HADD) of fish habitat unless authorized; or
 - Deposition of substances deleterious to fish in waters frequented by fish.

3.2.2 Sediment and Erosion Control Measures

- If in stream work is unavoidable, plan the work for periods of low flow or during appropriate or reduced-risk work windows.
- If necessary, provide temporary drainage and pumping to keep construction sites free from water.
- Pump sediment laden water away from natural water bodies and onto a stable, flat, vegetated area.
- Implement and maintain sediment and erosion control measures to prevent sedimentation of watercourses; measures may include installation of silt fence, hay bales, check dams, water diversions, turbid water

collection sumps etc. Sediment and erosion control measures should be installed before construction works begin.

- Silt fence material is to be a woven, geotextile designed to reduce velocity of runoff to a point that allows suspended particles to settle out of the water.
- Exposed soils in areas that can contribute sediment to creeks should be stabilized and/or replanted as soon as practical to minimize the potential for erosion.

3.2.3 Locating Access Trails and Stream Crossings

- Any crossing of fish bearing waters will be referred to the Department of Fisheries and Oceans for an authorization under the Fisheries Act.
- Crossings of fish bearing creeks will be constructed following best practices identifies in “Standards and Best Practices for Instream Works” and the “Fish-stream Crossing Guidebook” and will be constructed in a manner that allows fish passage and protects fish habitat above and below the steam crossing.
- At each crossing, the access trail will cross the riparian area and the stream at right angles to minimize the area of disturbance.
- Crossings should be located:
 - Where the stream channel is narrow and the banks are stable.
 - To avoid crossing in areas with fine or unstable bank materials.
 - To avoid crossings in areas with stable large woody debris.
- Stream crossings should not damage or block stream flow.
- Culvert crossings will follow culvert drainage designs in Chapter 4 - Road Drainage Construction in the “Forest Road Engineering Guidebook” (MOF 2002). Road drainage principals outlined in Chapter 4 include:
 - Installation of culverts at each stream;
 - Installation of cross drains with ditch blocks to reduce the erosional forces of water in ditches;
 - Ensuring that ditches discharge to forested areas and not directly into creek channels;
 - The use of appropriately sized culverts to accommodate stream flows; and,
 - The installation of extra and/or oversized culverts where trails cross an active floodplain
- If using log culverts, follow design specifications in Chapter 4 of the “Forest Road Engineering Guidebook”.
- Fill heights should be minimized within the active floodplain and the fill protected from erosion.
- Route access trails outside of RMAs and active floodplains and minimize stream crossings wherever possible.

- To minimize short and long-term impacts on the RMA, minimize widths of trail beds right-of-ways.

3.2.4 Equipment Operation

- Minimize operation or transportation of mechanized equipment within the RMA, unless no practicable alternative route or work location exists or operating the machinery outside the RMA will create a higher risk of release of deleterious substances into the watercourse.
- If it is necessary to operate machinery within the RMA, locate the machinery outside the active channel, beyond the top of bank.
- Ensure equipment and machinery is in good operating condition, and is free of leaks, excess oil, and grease.
- Equipment servicing or fuelling should not occur within 30 m from any watercourse other than pumps and machinery that are:
 - hand-held;
 - required for firefighting;
 - broken down and require fuel or services in order to be moved; or
 - authorized by permit to be fuelled or serviced in the area.
- Any fuel or lubricant leaks will be captured and contained.

3.3 Waste and Pollution Control

- Prevent the release of water containing sediment, debris or deleterious substances into RMAs and watercourses in accordance with Federal and Provincial legislative requirements.
- Do not store hazardous materials within the RMA.
- Maintain a spill kit with sufficient quantities of absorbent materials in the active work areas; spill kit should be available in close proximity to working machinery.
- Control runoff of water containing suspended sediment, debris or other deleterious substances in accordance with Federal and Provincial requirements
- Maintain temporary erosion and pollution control features.
- Dispose of solid waste, such as additive containers, rags, domestic refuse, and drill core boxes at an approved off-site facility. Provide suitable collection containers for use by contractors and crews.
- Never dispose of waste or volatile materials in RMAs or watercourses.
- Do not bury or burn waste materials.

3.4 Vegetation Removal

- Minimize clearing native vegetation and topsoil and specifically try to avoid removing larger trees.
- Avoid grubbing or pulling up roots within the RMA.

- Fall and yard trees that need to be cleared away from RMAs and not into or across them.

3.5 Reclamation

- Reclamation of any disturbances in riparian zones conducted as per Health, Safety and Reclamation Code for Mines in BC.
- Reclamation of exploration or access will be conducted as per Section 9.10.1 (7) of the Health, Safety and Reclamation Code for Mines in BC and will result in:
 - Restoration of drainage patterns;
 - Removal of bridge superstructures;
 - Removal of bridge substructures if failure would affect downstream values;
 - Removal of all stream culverts;
 - A stable surface that minimizes future erosion; and
 - The establishment of self-sustaining vegetation appropriate for the site.

3.6 2017 Exploration Program Specific Considerations

- The RMA for the fish-bearing Fish Creek is 30 m for drilling and 50 m for exploration access (based on a stream width of >5 and ≤ 20). The majority of access trails have been routed outside of RMAs and active floodplains to minimize stream crossings. No crossings of the main stem of Fish Creek are currently planned
- The locations of two stream crossings, both non-fish bearing waters, are shown on Figure 1 (numbered blue shaded circles).
- An assessment of stream crossing 1 will be conducted by a qualified professional prior to construction to confirm the stream is non-fish bearing.
- Stream crossings associated with the 2017 NOW will be located and built following guidelines described in this EPMP.

4.0 References

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Ministry of Environment. 2004. Standards and Best Practices for Instream Works.
www.env.gov.bc.ca/wld/documents/bmp/iswstdsbpsmarch2004.pdf

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www.for.gov.bc.ca/tasb/legsregs/fpc/fpcguide/guidetoc.htm

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<http://www.for.gov.bc.ca/tasb/legsregs/fpc/fpcguide/fishstreamcrossing/fscgdbk.pdf>

Taseko Mines, 2009. Prosperity Environmental Assessment, Volume 5, Appendix 5-5-C Rare Plant Survey.

5.0 Appendices

Figure 1 – Map of Fish Bearing Streams
New Prosperity Copper-Gold Project

**Figure 1 –
Map of Fish Bearing Streams
New Prosperity Gold-Copper Project**



From: [Hill, Edward GCPE:EX](#)
To: [Anderssen, Hans ABR:EX](#); [Hutchinson, Lindsay ABR:EX](#); [Andersen, Behn ABR:EX](#); [Schwaiger, Ashlyn ABR:EX](#)
Subject: Fwd: TNG news release on work permits
Date: Tuesday, July 18, 2017 10:10:21 AM

**In time of crisis, B.C makes unbelievable move to approve drilling permits
for twice rejected New Prosperity mine**
Tsilhqot'in National Government
Monday, July 19, 2017

Copyright

<https://www.xenigwetin.net/news/2017/7/17/in-time-of-crisis-bc-makes-unbelievable-move-to-approve-drilling-permits-for-twice-rejected-new-prosperity-mine>

From: [Giles, Wayne ABR:EX](#)
To: [Scharf, Mike R ABR:EX](#); [Yardley, Ryan D ABR:EX](#); [Schwaiger, Ashlyn ABR:EX](#)
Subject: Fwd: Vancouver Sun: First Nation angry over timing of permits issued for controversial New Prosperity mine
Date: Wednesday, July 19, 2017 10:36:13 AM

More on this... doesn't appear to be affect our fire communications with them.

Sent from my mobile

Begin forwarded message:

From: "Lyons, Devon ABR:EX" <Devon.Lyons@gov.bc.ca>
Date: July 19, 2017 at 10:29:32 AM PDT
To: "Gash, Michael ABR:EX" <Michael.Gash@gov.bc.ca>, "Giles, Wayne ABR:EX" <Wayne.Giles@gov.bc.ca>
Cc: "O'Sullivan, Susan FLNR:EX" <Susan.OSullivan@gov.bc.ca>
Subject: Vancouver Sun: First Nation angry over timing of permits issued for controversial New Prosperity mine

<http://vancouver.sun.com/business/local-business/first-nation-angry-over-timing-of-permits-issued-for-controversial-new-prosperity-mine>

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Withheld pursuant to/removed as

s.14;s.16;s.13

From: [Ritchie, Leanne GCPE:EX](#)
To: [Schwaiger, Ashlyn ABR:EX](#); [Anderssen, Hans ABR:EX](#); [Kelly, Susan M ABR:EX](#); [Hollingshead, Ian ABR:EX](#)
Cc: [Jordan, Ryan J ABR:EX](#)
Subject: RE: TNG Press release
Date: Tuesday, July 18, 2017 9:28:12 AM

Thanks Ashlyn.

We are just about to hope on our morning communications call. This was flagged last night to the Joint Information Centre and will likely be deferred to Energy and Mines for media questions as it is not a wildfire related issue.

I will confirm media approach shortly.

Leanne

From: Schwaiger, Ashlyn ABR:EX
Sent: Tuesday, July 18, 2017 9:20 AM
To: Anderssen, Hans ABR:EX; Kelly, Susan M ABR:EX; Hollingshead, Ian ABR:EX
Cc: Ritchie, Leanne GCPE:EX; Jordan, Ryan J ABR:EX
Subject: TNG Press release

FYI, TNG has released a strongly-worded press release yesterday evening regarding the approval of Taseko mine permits yesterday in light of the fire situation. Flagging for NEA PREOC should it affect current relations as well as Ryan Jordan with CIEM Branch should it be necessary to loop in MEM etc (I'm sending purely as a fire-response related heads up).

The quotes reference that it was a Liberal decision so could be that the change in government today may help to ease tensions...

Ashlyn

<https://www.xenigwetin.net/news/2017/7/17/in-time-of-crisis-bc-makes-unbelievable-move-to-approve-drilling-permits-for-twice-rejected-new-prosperity-mine>

ASHLYN SCHWAIGER, M.A.

Senior Analyst | Critical Incidents and Emergency Management Branch
Ministry of Aboriginal Relations and Reconciliation

Office: 250.356.8721 | Cell: 250.380.8372

Critical Incidents and Emergency Management Branch email: CIEMBranch@gov.bc.ca

July 17, 2017

In time of crisis, B.C makes unbelievable move to approve drilling permits for twice rejected New Prosperity mine

TSILHQOT'IN NATIONAL GOVERNMENT

253 – 4th Avenue North - Williams Lake, BC V2G 4T4 - Phone (250) 392-3918 - Fax (250) 398-5798

PRESS RELEASE

In time of crisis, B.C makes unbelievable move to

approve drilling permits for twice rejected New Prosperity mine

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Communications Manager and Strategic Initiatives

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JP Laplante

Mining, Oil & Gas Manager

Tsilhqot'in National Government

O: (250) 392-3918 C: (250) 267-3759

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Withheld pursuant to/removed as

s.14;s.16;s.13



Ministry of
Energy and Mines

July 14, 2017

File: 14675-20/0300150

Katherine Gizikoff
Taseko Mines Ltd.
15th Floor-1040 Georgia Street W
Vancouver BC V6E 4H1

Dear Katherine Gizikoff:

**Re: Amended Permit MX-3-131
Approval # 17-0300150-0714
Property New Prosperity**

You are hereby authorized to carry out exploration activities as detailed in the Notice of Work and Reclamation Program submitted October 17, 2016 and revised on November 07, 2016, under the above-noted permit. Your permit is amended to include the New Prosperity Property with a reclamation liability of \$180,500. The amended permit is enclosed, and you are reminded that you may not depart from the permitted program without written authorization.

Please ensure that you and all persons who are carrying out activities in accordance with this permit comply with all terms and conditions of the permit and are familiar with the permitted work program.

This permit applies only to the requirements under the *Mines Act* and Health, Safety and Reclamation Code for Mines in British Columbia (Code). Other legislation may be applicable to the operation and you (the Permittee) may be required to obtain approvals or permits under that legislation.

The Water Sustainability Act came into force on February 29, 2016. Mining activities, where water is diverted from streams and underground aquifers, are now regulated. On April 15th 2016 several exemptions were approved for 2016 and these exemptions have now been extended to December 31, 2017. Where necessary you should apply for a short term licence or water extraction permit for your mining activities. Application can be made online through Front Counter BC.

The BC Wildfire Service requests that all persons carrying out an industrial activity scheduled to occur within 300 metres of forest or grass land between March 1st and November 1st of each year submit a completed Emergency Contact Information Form (FS104) to the appropriate fire centre by March 31 each year. The FS104 form can be accessed here: <https://www.for.gov.bc.ca/isb/forms/lib/FS1404.pdf>

Please provide me with written notice at least 10 days prior to starting work and at least 7 days prior to ceasing work on the program.

Ministry of Energy and Mines

Mailing Address:
2nd Floor, 441 Columbia Street
Kamloops, BC V2C 2T3
Telephone: (250) 828 4131
e-mail: MMD-Kamloops@gov.bc.ca

Location:
South Central Region

The Annual Summary of Exploration Activities and the Multi-Year, Area Based Work Program Annual Update can be found at <http://www2.gov.bc.ca/gov/content/industry/mineral-exploration-mining/permitting/annual-reporting-forms>. Until this permit is closed, you must file this information by March 31 of each year.

Sincerely,

A handwritten signature in dark ink, appearing to read "Rick Adams". The signature is fluid and cursive, with the first name "Rick" and last name "Adams" clearly distinguishable.

Rick Adams
Senior Inspector of Mines - Permitting

Encl. NOW/Permit

cc: Reclamation Section, Victoria