



GITANYOW HEREDITARY CHIEFS

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Dear Mesdames and Sirs:

RE: Morrison Mine Re-consideration and comments of Pacific Booker Minerals on the Mount Polley Tailings Storage Facility Breach

We write to you today further to the letter of Mr. Caul dated March 27th, 2015.

We have reviewed the March 20th submissions of Pacific Booker Minerals (“PBM”). The Company’s uncertain approach and ongoing dismissal of our concerns (PBM March 20th submission, page 2) strengthens our view that the only reasonable option available to you on this re-consideration is to again refuse to grant the Company an Environmental Assessment Certificate and bring this long saga to a conclusion.

We say that the Company’s approach is uncertain because, in its March 20th submission, it appears to be justifying its current design while implying that the Best Available Technology of Filtered Tailings (“FT”) advocated by the Mount Polley Panel isn’t a good fit for the Morrison site. Nevertheless, the Company has prepared a conceptual plan of the application of FT to the proposed Morrison Mine site. With this approach, we don’t know which way the Company intends to proceed.

If you consider that the Company’s latest attempt to move its proposal forward is worthy of further analysis, our perspective is that the change to a FT system amounts to such a major change that it warrants a new environmental assessment (“EA”) review of the overall mine plan. Furthermore, we would require that the Working Group be re-activated to review and discuss

these latest significant changes in the project design for the proposed Morrison Mine. We remind you that the Working Group has not met since January, 2011 and has yet to be given an opportunity by the EAO to discuss the addition of a geomembrane liner to the project design. At page 18 of PBM's March 20th submission, the Company says that "The EA Application includes water treatment and discharge to allow the TSF to be managed with a minimum water volume."

This is not what we recall from our extensive review and analysis of the Application; in fact, the Review Response Report described a "zero-discharge facility" with a plan to store the mine water and processing water for 20 years in the TSF. Intentional water discharge to the environment was only planned following closure. To achieve its newly-stated objective of allowing the TSF to be managed with minimum water volume, does the Company now intend to discharge processing water directly into Morrison Lake during operations? If this is indeed the case, it raises additional, vitally important questions: what will the concentrations of heavy metals be in the discharged water, and what will the effect of these releases be on the sockeye rearing in Morrison Lake?

Concerns regarding the quality of discharge water from the mine were prominent issues during previous iterations of the EA process and resulted in the BCEAO hiring an independent third party reviewer, Robertson Geoconsultants Inc. (RGC), to examine the potential groundwater and water quality impacts. The reviewer concluded that there was "significant remaining uncertainty" regarding the potential contaminant concentrations in post-closure discharge water and its effects on water quality and stressed the importance and sensitivity of the lake and the need for "very conservative" predictions (RGC 2011, RGC 2012). The topic of water quality for discharge was a topic of discussion and dispute from 2009 to 2012. The proposed changes to the project significantly alter the processes and potential effects of the project and should not be accepted without significant additional information gathering and discussion. Whether or not the proposed changes will permit PBM to meet BC Water Quality Guidelines is an extremely important topic given the role of Morrison Lake as a critical habitat for juvenile sockeye salmon and the importance of sockeye salmon to Skeena First Nations.

These are only some of many questions that PBM's March 20th submission raises for us. Others include:

- Inadequate consideration of water balance was identified as one of the primary drivers of the Mount Polley dam collapse, and a frequent topic of discussion during the Morrison Mine EA process. More than 80% of the water budget for the original proposal was to be used in the processing plant or tailings facility (87%, Rescan 2009, 81%, Klohn Crippen Berger 2011). The new proposed project design will therefore have a very different water budget than the previous design. What is the new water budget, and have water balance spreadsheets been created to ensure that the new design is feasible?

- Will PBM commit to FT, given the (minimum) billion dollar price tag attached (PBM March 20th submission, page 15)?
- How is a cyclone sand dam “relatively insensitive” to human error (PBM March 20th submission, page 5)? Are these dams considered a Best Available Technology by the mining industry?
- PBM asserts that “Compaction of filtered tailings in winter and high rainfall/snowfall conditions is impractical....” (PBM March 20th submission, page 5) We are unclear of what PBM means by “impractical” in this context, but we note that allowing financial obstacles to prevent implementation of Best Available Practices would not be in keeping with the spirit of the Mount Polley recommendations.
- How will the geomembrane liner operate so as to “...significantly reduce or eliminate seepage pressures in the dam.” (PBM March 20th submission, pages 6, 10)? The original concept of using the geomembrane liner was to significantly reduce the leaching of toxic compounds from the TSF into groundwater. This implies that the liner has low permeability. If this is indeed the case, ponded water in the TSF will increase and will thus cause increased hydrostatic pressures on the dam.
- At page 13 of PBM’s March 20th submission, the Company says: “The filter plants would be placed near the proposed plant site and filtered tailings would be trucked to the TSF, which would be located within the eastern side of the currently proposed TSF.” We require clarification of whether this means that there is now another proposed TSF to accommodate the filtered tailings.

The Gitanyow do not believe that comprehensive geotechnical investigation and site characterization should be left until the detailed design stage, after an Environmental Assessment Certificate has been issued. Skeena Fisheries Commission wrote to Mr. Doug Caul on February 24th, 2015 to explain that the geotechnical data for the proposed tailings dam is weak and that some of it is not available on the EAO e-PIC site. The missing data are the results of the geotechnical surveys of 2006. We are surprised that the data inadequacy is not addressed in the PBM March 20th submission, especially since the failure of the Mount Polley tailings dam can be traced directly to inadequate geotechnical data. Adequate geotechnical data is required to evaluate the stability of the infrastructure, and adequate data has currently not been collected.

As the Company points out, at page 16 of its March 20th submission, “There is no precedent in the World for FT applied at this scale and in a similar climate, and consequently, the mine financing and feasibility is subject to the risk perception of the technology.” While PBM may be willing to experiment with new technologies in a last-ditch attempt to gain its Environmental

Assessment Certificate, we are unconvinced that such a leap should be made in such a valuable ecosystem as Morrison Lake.

As stated by Greg Tamblyn of MOE in his April 25th, 2014 Memorandum to Chris Hamilton:

The context of this project remains a critical consideration for the Ministry of the Environment. Morrison Lake and creek are pristine, high valued ecosystems supporting recreationally, commercially, and culturally important fish species, including a conservation unit (i.e. a unique group) of sockeye salmon.

MOE upholds its earlier conclusion that the high ecological values of Morrison Lake and creek are at risk to significant adverse effects as a result of the proposed mine. (Underlining added.)

We concur absolutely with this conclusion. Gitanyow cannot underline enough that this mine proposal poses a significant risk to our salmon fishery and hence to our way of life. We call on you to reject this Application and thereby show that you have heard and understood our concerns as expressed throughout this long EA process, and that you are prepared to meaningfully act in keeping with them.

Sincerely,



Glen Williams, Chief Negotiator
Gitanyow Hereditary Chiefs Office

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REFERENCES

Rescan Environmental Services Ltd. 2009. Morrison Copper/Gold Project: Environmental Assessment Application. Volume I, p. 182-183.

Klohn Crippen Berger 2011 Morrison Copper/Gold Project: Review Response Report – Rev 2. Appendix III. Water Balance – Life of Mine Spreadsheets.

Robertson Geoconsultants Inc. 2011. Third Party Review of Morrison Project Hydrology and Water Quality.

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