

Nicole Spencer

From: Chris Basil [basil.chris@gmail.com]
Sent: Monday, November 22, 2010 4:46 PM
To: Nicole Spencer
Subject: TNR Gold EA Hearing

Good Day Nicole,

It was interesting to experience an EA Hearing for the first time!

As we understand that the Public Registry is still open we would like to take the opportunity to have the following clarifications and comments posted. Hopefully this email format will be fine. Your assistance is much appreciated.

1. **CLARIFICATION AND REBUTTAL TO THE YKDFN SUBMISSION:** It was very disconcerting to see the North Arrow court decision in the YKDFN submission and their frequent statements that TNR's conduct was an exact repeat of North Arrow's conduct. We chose not to directly address that in our presentation to the Review Board and focused on presenting with a respectful, cooperative and modest tone. We highlighted TNR's efforts to consult in person and in the communities, and that TNR has used the input and concerns raised during those consultations to refine and modify its proposal. We hoped that presentation approach would stand on its own merits without devolving into a confrontational approach or tone. So the fact remains however that we would like to make absolutely clear that TNR is not North Arrow. In the court decision it is stated that no face to face meetings occurred, let alone meetings in the communities. TNR of course did conduct community meetings. Secondly, the court decision stated that North Arrow did not incorporate local/FN concerns into their proposal. TNR is on the record committing to incorporating First Nation's concerns into its proposed exploration program such as; Archaeological/Heritage Surveys with First Nation(s) participation in the design and implementation; Work Opportunities; Exploration Agreement Discussions and Development (as opposed to the door being shut on that issue). We feel it is necessary to have stated our position on this subject.
2. **ARCHAEOLOGICAL AND HERITAGE SITE BUFFER ZONES:** We were queried before and during the Hearing about whether or not TNR would commit to the recommended and/or suggested 150 metre buffer around archaeology sites. TNR has not made that commitment for a reason, mainly that a 150 metre buffer could generate significant logistical, environmental and cost challenges to its proposed exploration program. So we were pleased to hear a clarification of why that 150 metre buffer recommendation exists. As the GNWT archaeologist explained during the EA Hearing, the 150 metre buffer recommendation exists to ensure no disturbance occurs in situations where there is uncertainty about the exact location of an archaeological site. As there are no recorded sites on the property any sites that are found during our survey will not fall into an "uncertain location" category because not only will excellent GPS locations be gathered but we will be standing on the sites. In other words the sites will be very accurately located and positions clearly marked. At the very time a site (if any) is located a 30 metre buffer can be flagged and marked right then and there.
3. **CONCERNS ABOUT ARCHAEOLOGICAL AND HERITAGE BUFFERS:** To elaborate on our desire to adhere to the mandated 30 metre buffer zone instead of the 150 metre "recommended" buffer we would like to present a possible scenario. It is known that the project has existing road infrastructure, built by bulldozers. We intend to use this existing infrastructure to mobilize gear from camp to the pegmatite dikes and old mine area. This is a great blessing for the project and the company because we can avoid any new disturbances ... something we always keep in mind and look for when planning exploration program logistics. It is one of our key policies; Always look to limit disturbances. If by

chance a site is found 40 metres from the road from camp to the old mine and proposed drill sites and we follow the 150 metre buffer recommendation what position is the company in? Must it build a new access and therefor create a disturbance that would not be necessary if a 30 metre buffer was employed? Would INAC follow the same 150 metre buffer protocol and be presented with the challenge of not being able to use the existing road to pull the old bulldozer out of the swamp during its site remediation work? This is very significant. That bulldozer is far more of a challenge to move than the small drill we will be deploying. So in conclusion we feel it will be appropriate and in keeping with regulations for TNR to observe the 30 metre buffer regulations as they presently stand.

4. **CONCERNS ABOUT THE ARCHAEOLOGICAL SURVEY TIME-LINE:** It was enlightening for us to hear from the GNWT archaeologist about how their permitting and reporting process works, in particular, the time-lines for reporting. Some questions and concerns arise from this understanding. What if the Review Board incorporates as a Permit Condition the YKDFN's submission that the entire property be surveyed (instead of the areas of work contained in our Exploration Application) before anything else happens? A permit condition of that nature, coupled with the lengthy reporting time, would effectively wipe out another exploration season, all the while generating significant costs to the company without anything in the way of exploration to show for it. We would much prefer to build a workable consensus plan with all concerned parties that will satisfy all.
5. **MOVING FORWARD ON ARCHAEOLOGY ISSUE:** As mentioned above we would like to work out a consensus on how best to proceed. We have requested some guidance from the YKDFN, in particular, recommendations for an archaeologist with suitable experience. We hope that between the archaeologists (GNWT and contractor), the First Nations and ourselves we can design a survey all are comfortable with and involved in, as we have committed to.

In closing we would like to say that we were pleased for the opportunity to present ourselves in person to the Review Board. We hope for a favorable resolution to this permitting process as well as look forward to building a positive working relationship with all.

Sincerely

Chris Basil
Public Relations Officer
TNR Gold Corp.