

August 30, 2019

Alex Bolton
Chair, Joint Review Panel
c/o Dean Campbell
Alberta Energy Regulator
Suite 1000 – 250 5 Street SW
Calgary, Alberta T2P 0R4

RE: Benga Mining Ltd. –Information Required for Revised Addendum 10 for the Grassy Mountain Coal Project Joint Review Panel Information Requests

Dear Mr. Bolton,

On July 12, 2019, Benga Mining Limited (Benga), provided to the Joint Review Panel (JRP) Addendum 10, which included responses to information requests (IR) issued by the JRP in regard to Benga's application for the Grassy Mountain Coal Project (the Project). Addendum 10 included the following:

- Package 1 – responses to the JRPs request for additional information regarding air quality and noise, which was issued on March 21, 2019 to Benga as JRP IR Package #1;
- Package 2 – responses to the JRPs request for additional information regarding vegetation & reclamation and closure & reclamation, which was issued on April 4, 2019 to Benga as JRP IR Package #2;
- Package 3 – responses to the JRPs request for additional information regarding geotechnical & dam safety, land use & land management, and socioeconomics, which was issued on April 15, 2019 to Benga as JRP IR Package #3;
- Package 4 – responses to the JRPs request for additional information regarding Indigenous rights, land use & culture, and human health, which was issued on May 3, 2019 to Benga as JRP IR Package #4; and,
- Package 5 – responses to the JRPs request for additional information regarding surface water quality, hydrology, hydrogeology, fish & fish habitat, cumulative effects, geotechnical, reclamation, wildlife, land use, and EA methodology, which was issued on May 14, 2019 to Benga as JRP IR Package #5.

On August 2, 2019, the JRP issued a letter to Benga indicating a review of the information provided by Benga had been conducted and that the JRP were of the opinion that some of the requested information had not been provided by Benga at the time. In the letter the JRP provided an Appendix A outlining the specific information requests the JRP requested additional information, and an Appendix B outlining identified formatting errors. For Appendix A, the request for additional information above what was provided in Benga's original information response pertained to:

- IR Reference # JRP IR-4.5 – Indigenous Rights, Land Use and Culture – Aboriginal Access Management Plan Framework
- IR Reference # JRP IR-4.6 - Indigenous Rights, Land Use and Culture – Views of Indigenous Groups Considering Frontier Methodology
- IR Reference # JRP IR-4.13 – Human Health – Role of Country Foods in Physical, Mental, and Spiritual Health of Indigenous Peoples
- IR Reference # JRP IR-5.1 – Surface Water Quality – Selenium Risk Assessment using Alberta Guideline
- IR Reference # JRP IR-5.5 – Surface Water Quality – Saturated Backfill Zones
- IR Reference # JRP IR-5.9 – Surface Water Quality – Cumulative Effects on Periphyton, Benthics, and Fish
- IR Reference # JRP IR-5.15 – Hydrology – Use of Runoff Coefficient and Reassessment of Hydrology and Fish Effects Assessments
- IR Reference # JRP IR-5.34 – Wildlife – Baird’s Sparrow and American Badger

On August 9, 2019, Benga indicated to the JRP that the requested additional information related to JRP IR-4.5, 4.6, 4.13, 5.5, 5.15 (Excel spreadsheet), and 5.34 would be provided; however, respectfully requested that the responses to JRP IR-5.1, 5.9, and 5.15 (text response), be referred to technical review without modifications. On August 14, 2019, the JRP reviewed the supporting rationale provided by Benga regarding the responses to JRP IR-5.1, 5.9, and 5.15, and indicated that the JRP is prepared to accept a revised Addendum 10 that does not contain additional responses to those three information requests, on the understanding that all other information would be provided.

On August 30, 2019, Benga are providing an updated Addendum 10, which includes:

- Package 1 – unchanged from July 12, 2019 submission;
- Package 2 – unchanged from July 12, 2019 submission (other than Appendix 2.6-1 bookmark error corrected);
- Package 3 – unchanged from July 12, 2019 submission;
- Package 4 – unchanged from July 12, 2019 submission other than updates to JRP IR-4.5, 4.6, and 4.13 (with bookmark errors corrected); and,
- Package 5 – unchanged from July 12, 2019 submission other than updates to JRP IR-5.1 (additional information on selenium speciation now provided), JRP IR-5.5, and JRP IR-5.34,

along with the provision of Appendix 5.15-2 in Excel format, and with bookmark errors corrected.

Addendum 10 has been provided to Tracy Utting, Panel Manager, at the following email address CEAA.GrassyMountain.ACEE@canada.ca

Benga trusts the additional information meets the expectations of the JRP, and once accepted will be posted to the registry for a 45-day opportunity for the public to review and comment on.

Correspondence regarding this information request package should be directed to the attention of Martin Ignasiak (Osler) and Mike Bartlett (Millennium EMS Solutions Ltd).

Sincerely,

<Original signed by>

Gary Houston, VP External Affairs
Benga Mining Ltd.