September 18, 2022

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Jennifer Dallaire
Project Manager, Prairie and Northern Region
Impact Assessment Agency of Canada
Suite 1145, 9700 Jasper Avenue
Edmonton, Alberta T5J 4C3

Dear Ms. Dallaire:

RE: Summit Coal Inc. Mine 14 Project – Response to Impact Assessment Agency of Canada (IAAC) Questions

Summit Coal Inc. (Summit) submitted a response to the IAAC on September 8, 2022 which provided information related to a request to designate the Mine 14 Project Under Section 9(1) of the Canada *Impact Assessment Act*. This document has been prepared to respond to questions received on September 14, 2022, from the IAAC as a result of the initial submission.

The following are Summit's responses:

Question:

1. As there are no external rock dumps planned for the Project, can you provide detail on how waste rock will be handled? Of interest is whether any waste rock will be stored at surface for any period of time during any phase of the Project, and whether waste rock stored underground can be weathered (i.e. exposed to air/water).

Response:

Summit has estimated that the total waste rock volumes that will be generated by Mine 14 will be in the range of 0.5 to 3% of the total production, which will be 1.3 million raw metric tonnes annually. This will equate to the following approximate volumes:

- 0.5% - 6,500 tonnes per year (18 t/d) (coal haul trucks have a 40-tonne capacity, so this is equivalent to less than half a truck)
- 3% - 39,000 tonnes per year (107 t/d) (approximately 2.5 coal haul trucks)

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In comparison to a surface mine, this is significantly less. For example, a typical surface mine that has a strip ratio of 5:1 (which would be considered low compared to most open pit mines) would create approximately 500% waste rock as it relates to annual production. Using the same annual total production of 1.3 million raw metric tonnes this would equate to approximately 6.5 million tonnes of waste rock per year, which would be disposed of on the surface and would be subject to long term weathering and potential selenium liberation.

Due to the highly selective underground mining techniques at Mine 14, very little waste rock will be generated from the underground mining. The small volumes that will be mined, will be brought to the surface with the coal and will be processed in a rotary breaker. The waste rock will be placed into a stockpile on the surface and then transported back into the mined-out workings underground for permanent disposal, usually within the same day. The range of waste rock will vary from 18 tonnes per day (less than one half the volume of the coal haul truck) to 107 tonnes per day (approximately the volume of 2.5 coal haul trucks).

All waste rock material disposed of in the underground workings will be located well below the surface and will never be subject to the weathering processes, that would occur if it was stored on the surface. It is these surface processes that usually result in the liberation of selenium. Typically, the weathering process and selenium generation takes months or years to occur.

Question:

2. The Agency understands that coal will be transported to the coal processing plant at the HR Milner Generating Station. Can you clarify if any waste rock is anticipated to be stored at the CPP for any period of time, pre or post processing? And if you have any information on storage of coal at the facility?

Response:

The raw coal will be transported to the coal processing plant (CPP) using highway ready trucks (capacity will be 40 tonnes per truck) from the Mine 14 portal area. As discussed above, the waste rock will be separated from the raw coal at the mine portal site and disposed of in the underground workings. Waste rock will not be stored at the CPP at any time before or after processing.

The raw coal will be transported from Mine 14 to the CPP and will be placed into an outside raw coal stockpile and fed into the CPP using a loader. Clean coal will also be placed into an outside stockpile once the processing is complete. The coal will be loaded onto trains for transport to customers.

Please let me know if you have any questions regarding this submission at
<contact information removed>
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Regards,

Summit Coal Inc.

<Original signed by>

Shaun McNamara
Director, Environment and Safety

cc: Andrew Clark, IAAC
Allisson Lefebvre, IAAC
Martin Ignasiak, Osler
Jesse Baker, Osler
Kyle Mitton, Summit

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