Dear [Redacted]

Re: Your request for access to information under Part II of the Access to Information and Protection of Privacy Act (File # NR-232-2018)

On October 22, 2018, the Department of Natural Resources received your request for access to the following records/information:

Any Decision, Direction, Information, Meeting, Briefing or other such note created in 2018 regarding RAMBLER METALS AND MINING CANADA LIMITED.

I am pleased to inform you that a decision has been made by the Department of Natural Resources, confirmed by the Deputy Minister, to provide access to the requested records. The records are attached.

We are providing access to the most information possible but have made redactions in accordance with Sections 29(1)(a), 35(1)(d) and 35(1)(g) of ATIPPA, 2015 as follows:

29. (1) (a) The head of a public body may refuse to disclose to an applicant information that would reveal advice, proposals, recommendations, analyses or policy options developed by or for a public body or minister;

35. (1) (d) The head of a public body may refuse to disclose to an applicant information which could reasonably be expected to disclose information, the disclosure of which could reasonably be expected to result in the premature disclosure of a proposal or project or in significant loss or gain to a third party;

35. (1) (g) The head of a public body may refuse to disclose to an applicant information which could reasonably be expected to disclose information, the disclosure of which could reasonably be expected to prejudice the financial or economic interest of the government of the province or a public body.
As set out in section 42 of the Act you may ask the Information and Privacy Commissioner to review the department’s decision to provide access to the requested information. A request to the Commissioner must be made in writing within 15 business days of the date of this letter or within a longer period that may be allowed by the Commissioner. Your request should identify your concerns with the department’s response and why you are requesting a review.

The request for review may be addressed to the Information and Privacy Commissioner is as follows:

Office of the Information and Privacy Commissioner
2 Canada Drive
P.O. Box 13004, Stn. A
St. John’s, NL A1B 3V8

Telephone: (709) 729-6309
Toll-Free: 1-877-729-6309
Facsimile: (709) 729-6500

Pursuant to section 52 of the Act, you may also appeal directly to the Supreme Court Trial Division within 15 business days after receiving the department’s decision.

Please be advised that responsive records will be published following a 72 hour period after the response is sent electronically to you or five business days in the case where records are mailed to you. It is the goal to have the responsive records posted to the Completed Access to Information Requests website within one business day following the applicable period of time. Please note that requests for personal information will not be posted online.

For further details about how an access to information request is processed, please refer to the Access to Information Policy and Procedures Manual at http://www.atipp.gov.nl.ca/info/index.html.

If you have any questions, please feel free to contact me at 709-729-0463 or rhynes@gov.nl.ca.

Sincerely,

Rod Hynes
ATIPP Coordinator
Title: *Mining Act* approval of Rambler Metals and Mining Ltd.'s Ming Copper-Gold Mine Phase II

**Decision/Direction Required:**
- It is recommended that the Minister approve the Phase II Development Plan and Phase II Rehabilitation and Closure Plan for Rambler Metals and Mining Ltd.'s Ming Copper-Gold Mine under section 6.(1) and 9.(2) of the *Mining Act*, conditional on the following:
  - All waste rock and ore is assumed to be acid generating material (AGM) until otherwise scientifically demonstrated by Rambler Metals and Mining Ltd. Waste rock and ore must be handled, stockpiled and rehabilitated in a manner that is appropriate for AGM, as identified in the development plan and rehabilitation and closure plan.
  - Rambler Metals Mining Ltd.'s annual reports must provide information on the annual survey of the waste rock stockpile, including updated topography, sections and quantities (in cubic meters and tonnes).
  - Rambler Metals and Mining Ltd. shall provide the following information on the Dense Media Separator (DMS) and paste plant prior to start of construction: equipment layout drawings, the equipment specifications and capacities and the updated process flow diagrams.
  - Rambler Metals and Mining Ltd. shall provide final as-built drawings for approved site developments.
- A letter approving the Development Plan and accepting the Rehabilitation and Closure Plan is attached for the Minister’s signature.

**Background and Current Status:**
- Since 2011, Rambler Metals and Mining Ltd. (RMM) has operated the Ming Copper-Gold mine and Nugget Pond mill near Baie Verte, NL. Ore is trucked 40 km from the Ming mine to the Nugget Pond mill for processing. The Phase I project was a high grade, low tonnage operation with a mine life of six to seven years at 850 metric tonnes per day (mtpd).
- On March 15, 2016, the Minister approved an amendment to RMM’s Development Plan that included test mining and processing of the Lower Footwall Zone (LFZ) ore. The LFZ is a lower grade deposit at the Ming mine that, in order to be economic, will require mining and milling at a higher rate.
- RMM submitted its draft Phase II Development Plan and draft Phase II Rehabilitation and Closure Plan for the Ming Mine project, on February 3 and February 14, 2017 respectively. The Phase II plans cover the period of 2017-2021 and include works that prepare for mining the LFZ (Phase III) and a potential further 15+ year life of mine.
- After Mineral Development staff review of the draft plans, RMM submitted additional information on the Development Plan on October 5, 2017 and likewise submitted additional information on the Rehabilitation and Closure Plan on October 3, 2017 and December 13, 2017. MDD received the final version of the Development Plan on January 5, 2018 and the final version of the Rehabilitation and Closure Plan was January 11, 2018.
• RMM currently employs 195 personnel and will require 27 additional employees for the project at full production.

• The financial assurance required for the rehabilitation and closure of the Ming mine and Nugget Pond sites is $4,497,832. RMM currently has $4,429,661.22 in financial assurance in place leaving an outstanding balance of $68,171.78.

• RMM is in compliance with the *Mining Act*.

**Analysis:**

• The Development Plan and Rehabilitation and Closure Plan were reviewed by Mineral Development staff and the Mining Act Submissions Committee and are acceptable.

• The continued operation of the RMM Ming mine and Nugget Pond mill will depend on RMM moving through Phase II work and on to Phase III with the development of the LFZ and a potential further 15+ year life of mine.

• Conditions contained within the approval letter have been discussed with RMM.

• The Minister’s approval letter has been reviewed by the Departmental Solicitor.

**Alternatives:**

• N/A

**Prepared/Approved by:** A. Steel / A. Smith / P. Canning

**Ministerial Approval:** Received from Hon. Siobhan Coady

*March 15, 2018*
Decision/Direction Note
Department of Natural Resources

Title: Mill Licence (ML- RMM-04) for Rambler Metals and Mining Ltd.'s Nugget Pond mill under Section 5 of the Mining Act.

Decision/Direction Required:
- It is recommended that the Minister sign the attached Mill Licence (ML-RMM-04) for Rambler Metals and Mining Canada Limited.

Background and Current Status:

- Rambler Metals and Mining Limited (RMM) operates the Ming Copper-Gold mine and Nugget Pond mill on the Baie Verte peninsula, NL. The project is a high grade, low tonnage operation with a mine life of up to 5 to 6 years, at 850 metric tonnes per day (mtpd). Ore from the mine is trucked 40 km to the Nugget Pond mill for processing.

- The Nugget Pond mill is located on Surface Lease #108691 near Snook's Arm. The source of ore is the Ming Mine deposit located on mining lease No's 141(4532) and 188(10241M) near Baie Verte.

- On March 15, 2016, the Minister approved an amendment to RMM's development plan that included test mining and processing of the Lower Footwall Zone (LFZ) ore. This approval included amendment of RMM's mill licence (ML-RMM-03) to permit an increase in mill production rate to 1000 tonnes per day for the purpose of processing the LFZ ore mined during the test mining phase.

- In July, 2015, RMM completed a prefeasibility study on developing the LFZ. The LFZ is a lower grade deposit and requires mining and processing at a higher rate to make the operation economically feasible.

- Phase II development and rehabilitation and closure plans for the Ming Mine project, including infrastructure preparations for the LFZ expansion, were submitted to NR for review on February 6 and 16, 2017 respectively. Revised versions of the Phase II Mining Act plans have been reviewed by the Mineral Development staff and are acceptable.

- The attached Mill Licence has been reviewed by the Departmental Solicitor.

- RMM is in compliance with the Mining Act.

Analysis:
- The application for the Mill Licence was reviewed by Mineral Development and is acceptable.

- Section 5 of the Mining Act requires the Minister to issue a Mill Licence to a lessee upon application. The issuing of a Mill Licence is a routine matter.

- The attached Mill Licence has been reviewed by the Departmental Solicitor.
Alternatives:
- Not applicable.

Prepared/Approved by: M. Qureshi / A. Steel / A. Smith
Ministerial Approval: Received from Hon. Siobhan Coady

March 20, 2018
Title: Newfoundland and Labrador Mining Industry Overview

Issue: Overview of the status of the mining industry in Newfoundland and Labrador for the 2018 Energy and Mines Ministers' Conference

Background and Current Status:
- The gross value of mineral shipments for Newfoundland and Labrador in 2017 was $3.60 billion with a forecasted value of $3.39 billion for 2018.

- The NL Mining industry average employment was 5,335 person years in 2017 with a forecasted value of 6,111 person years in 2018. Mining construction employment included in these values for 2017 and 2018 are 496 and 874 respectively, the increase is mainly attributed to Voisey’s Bay Underground Mine Expansion.

- Iron, nickel, and copper contribute 91% of the value of shipments from the province with gold, cobalt, silver, industrial minerals, stone, sand and gravel contributing the remainder.

- Producing mines in the province are summarized in the table below:

<table>
<thead>
<tr>
<th>Operator</th>
<th>Commodity</th>
<th>Location</th>
</tr>
</thead>
<tbody>
<tr>
<td>Vale Newfoundland and Labrador Limited</td>
<td>Nickel/Copper/Cobalt</td>
<td>Voisey’s Bay</td>
</tr>
<tr>
<td></td>
<td>Finished</td>
<td></td>
</tr>
<tr>
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<tr>
<td>Iron Ore Company of Canada</td>
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</tr>
<tr>
<td>Hi – Point Industries (1991) Ltd.</td>
<td>Peat</td>
<td>Bishop’s Falls</td>
</tr>
<tr>
<td>Barite Mud Services Inc.</td>
<td>Barite</td>
<td>Buchans</td>
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<tr>
<td>Trinity Resources Ltd.</td>
<td>Pyrophyllite</td>
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- Vale Newfoundland and Labrador announced that its Voisey’s Bay Mine Expansion will proceed this summer. The project represents close to $2 billion in capital expenditures by Vale. There will be 16,000 person years of employment during the five years of construction, peaking at 4,800 person years in 2020. First ore production from underground is expected by April 2021.

- Tacora Resources Inc., an iron ore mining and development company based out of Grand Rapids, Minnesota, has acquired the former Wabush Scully mine in Wabush, Labrador. In a May 2018 Preliminary Economic Assessment the company estimated a capital expenditure of $210 million to reactivate the mine. Tacora has been released from environmental assessment and is currently attempting to raise capital.

- Wabush 3 project, owned by the Iron Ore Company of Canada, was delayed due to a nine week work stoppage. IOC plans to officially open Wabush 3 on September 25, 2018.
• Howse Minerals Limited, a subsidiary of Tata Steel Minerals Canada, has been given Mining Act approval for their Howse project in Menihek area of Labrador.

• Alderon Iron Ore Corp. continues to advance their Kami project located in Labrador West. The company expects to release a new Feasibility Study in Q4, 2018.

• Red Moon Resources Inc. is developing the Ace gypsum deposit near Flat Bay. Mining Act approval is in place and mining can start once financial assurance is in place. The mine will employ 15 people on a seasonal basis with an initial production of 100,000 – 250,000 tonnes per year ramping up to 300,000 – 450,000 tonnes per year. The life of the mine is expected to be 10 years.

• Projects in advanced stages of exploration in the Province:

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Analysis:

• Over the past year, iron ore prices have remained fairly steady with a peak of $79.70 USD/tonne at the end of February. As of July 20, the price is $64.10 and the average price for the past month (June 20- July 20) is $63.40.

• Efforts to advance potential iron ore projects in Labrador are based on being high quality ore which is in demand from China due to efforts to reduce emission.

• Nickel prices have fluctuated over the past year peaking at $15,750 USD/tonne in June and at July 20 is $13,425. The average price for the past month (June 20 - July 20) is $14,335. Nickel prices are closely related to demand from stainless steel producers who account for about two-thirds of total demand.

• Copper prices had steadily increased since January 2016 and peaked in June at $3.29 USD/lb. Prices have since declined to $2.75 as of July 20 and the average price for the past month (June 20 - July 20) is $2.95.

Prepared/approved by: B.Lawlor / K. Bradbury / A. Smith
Ministerial Approval: Received from Honourable

July 31, 2018
Information Note
Department of Natural Resources

Title: Newfoundland and Labrador Mining Industry Overview

Issue: To provide a status update on the Newfoundland and Labrador Mining Industry

Background and Current Status:

- The gross value of mineral shipments for Newfoundland and Labrador (NL) in 2017 was estimated to be $3.6 billion. The gross value is forecast to be $3.0 billion in 2018. The decrease can be primarily attributed to a reduction in the value of iron ore shipments.

- The NL Mining Industry generated an estimated 5,145 person years of employment in 2017 and expects to generate 5,527 person years of employment in 2018. The increase can be primarily attributed to an expected increase in construction employment related to the proceeding Voisey’s Bay Underground Mine Expansion Project.

- Producing mines in the province are highlighted in the table below:

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- As part of the Phase 3, The Way Forward: Building for Our Future, NR, in collaboration with the mining industry and community stakeholders, is developing a strategic framework for growing the provincial mining industry. Engagement sessions have been completed with specific stakeholders including Mining Industry NL, NL Prospectors Association, and other government departments. Broader consultation sessions will be completed by the first week of October and will be held in Labrador City, Happy Valley-Goose Bay, St. John’s, Springdale and Marystown. NR is targeting a release of the Mineral Strategy, pending completion of aboriginal consultations, at the annual Mineral Resources Review being held November 1, 2018.

- On June 11, 2018, Vale announced that it will be proceeding with the Voisey’s Bay Mine Expansion Project. The project represents close to $2 billion in capital expenditures by Vale and will provide 16,000 person years of employment during the five years of construction, peaking at 4,800 person years in 2020. First ore is expected by April 2021.

- Tacora Resources Inc. has acquired the former Wabush Scully mine in Wabush, Labrador. In a Preliminary Economic Assessment (May 2018) the Company estimated a capital
expenditure of $210 million to reactivate the mine. Tacora has been released from environmental assessment and is currently attempting to raise capital.

- The Wabush 3 project, owned by the Iron Ore Company of Canada, was delayed due to a nine week work stoppage which ended on May 28, 2018. IOC plans to officially open Wabush 3 on September 25, 2018.

- Howse Minerals Limited, a subsidiary of Tata Steel Minerals Canada, has been given Mining Act approval for the Howse project in the Menihek area of Labrador.

- Red Moon Resources Inc. had its first shipment from the Ace Gypsum Deposit near St. George's in August 2018. The mine will employ 15 people on a seasonal basis with an initial production level of 100,000 – 250,000 tonnes per year ramping up to 300,000 – 450,000 tonnes per year. The life of the mine is expected to be 10 years.

- Alderon Iron Ore Corp. continues to advance the Kami project located in Labrador West. The Company expects to release a new Feasibility Study in Q4 2018.

- Projects in the advanced stages of exploration in the province are listed in the table below:

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Analysis:

- Over the past year, iron ore prices have fallen since peaking at US$79.90 per tonne at the end of February 2018. As of September 17, 2018, the price of iron ore is US$69.25 per tonne and the average price over the past month is US$66.82 per tonne.

- There exists increased demand for high quality iron ore in China as the country is dedicated to reducing its emission levels.

- Nickel prices have increased slightly over the past year peaking at US$15,750 per tonne in June 2018. As of September 17, 2018, the price of nickel is US$12,235 per tonne and the monthly average is US$12,363 per tonne.

- Copper prices have declined over the past year and as of September 17, 2018 sit at US$2.66 per pound.

Prepared/approved by: G. Taylor / A. Smith

Ministerial Approval: September 17, 2018
Decision/Direction Note
Department of Natural Resources

Title: Mining Act approval of Rambler Metals and Mining Ltd.'s Camp Pond Access Road and Pipeline Route Construction

Decision/Direction Required:
- It is recommended that the Minister approve Rambler Metals and Mining Ltd.'s Phase II Development Plan Amendment and accept their Phase II Rehabilitation and Closure Plan Amendment for construction of the Camp Pond access road and pipeline route under section 6.(2) and 9.(2) of the Mining Act,
- A letter approving the Development Plan and accepting the Rehabilitation and Closure Plan is attached for the Minister’s signature.

Background and Current Status:
- Since 2011, Rambler Metals and Mining Ltd. (RMM) has operated the Ming Copper-Gold mine and Nugget Pond mill near Baie Verte, NL. Ore is trucked 40 km from the Ming mine to the Nugget Pond mill for processing. The Phase I project was a high grade, low tonnage operation with a mine life of six to seven years at 850 metric tonnes per day (mtpd).
- On April 9, 2018, the Minister approved RMM’s Phase II Development Plan that covers the period 2017-2021 and includes preparation works for mining the Lower Footwall Zone (LFZ), which has potential to extend the mine life for further 15+ years. The Phase II Development Plan also includes increasing the storage capacity of the current tailings pond (Nugget Pond).
- On December 13, 2017, RMM submitted an Environmental Assessment registration for the construction of a new tailings impoundment in nearby Camp Pond in place of increasing the storage in Nugget Pond. The project was released from environmental assessment review on June 21, 2018.
- On August 8, 2018, RMM submitted an amendment to the Phase II Development Plan and Rehabilitation and Closure Plan consisting of the construction of an access road, a pipeline route, and a new tailings impoundment at Camp Pond. RMM requested initial approval for the access road and pipeline route construction.
- After Mineral Development staff review of the amendment, RMM submitted a separate Phase II Development Plan and Rehabilitation and Closure Plan amendment for the access road and pipeline route on August 29 and additional information on September 24, 2018 and October 10, 2018.
- On October 31, 2018, RMM applied for the surface rights to cover the areas containing the original Nugget Pond tailings impoundment, the Camp Pond impoundment, and related infrastructure.
- RMM is in compliance with the Mining Act.

Analysis:
- The road will remain in place for the long term to allow for monitoring and maintenance of the dams associated with the new tailings impoundment. A total of $3095 in additional financial assurance is required to cover the rehabilitation of the pipeline corridor.
• The amendment for the construction of the Camp Pond access road and pipeline route was reviewed by Mineral Development staff and is acceptable.

• Early approval of the construction of the access road will allow Rambler to construct the road prior to winter while review of the Mining Act submission for the new tailings impoundment is ongoing.

• The continued operation of the RMM Ming mine and Nugget Pond mill depends on RMM having sufficient tailings storage capacity to move through Phase II work and on to Phase III with the development of the LFZ and a potential further 15+ year life of mine.

• The Minister’s approval letter has been reviewed by the Departmental Solicitor.

Alternatives:
• N/A

Prepared/Approved by:  S. Bassler / A. Smith
Ministerial Approval: Received from Hon. Siobhan Coady

November 5, 2018