

September 11, 2014

Dale Reimer, Mine Manager Mount Polley Mining Corp. – Imperial Metals Likely, BC

Dear Mr. Reimer:

Re: INSPECTION ORDER - MINE EMERGENCY RESPONSE PLAN (MERP)

On September 8th, this inspector reviewed the status and completeness of the Mount Polley Mines, Mine Emergency Response Plan, 2014.

As per HSR Code 3.7.1, the mine shall develop and file with the chief inspector, a Mine Emergency Response Plan which shall be kept up-to-date and followed in the event of an emergency. The Mine Emergency Response Plan shall contain all of the elements required in the Mine Emergency Response Plan Guidelines for the Mining Industry.

The MERP was found to contain commitments to some of the elements as outlined in the Guidelines, but did not lay out specific content to speak to the elements as they pertain to Mount Polley operations. This includes but is not limited to; the roles and responsibilities for nightshift/weekend/holiday coverage, roles and responsibilities outside of those defined within the "Emergency Control Group", and emergency planning for possible impoundment failures such as a tailings dam. Essential maps, mine plans, escape routes and phone call-down lists were also not available.

Although the title page indicated 2014, SOPs within the document were dated February 2005. An actual revision date on the plan was not indicated. Conversations with workers revealed poor knowledge about emergency responsibilities and of the content of the plan.

This plan is out of date and not consistent with the elements contained within the Guidelines. The manager shall ensure a revision is completed without delay. It is recommended the OHSC be involved in this process. Once complete, training for all identified key personnel shall take place and shall be documented. The updated plan and training of all key personnel shall be completed by October 2, 2014. All persons who may be required to access the plan shall be able to state verbally their role and responsibilities and will know where to find and activate it. All response plans shall be organized in a central document or location with any older copies removed from circulation.

In the interim, key personnel and their after-hours designates shall be identified immediately and apprised of their roles and responsibilities in the event of an emergency. The existing MERP should be used for this and a record shall be kept of this interim training.

NOTE: Mount Polley Underground Mines Emergency Response Plan August 1, 2012 was also reviewed. This plan will also benefit from an update to ensure it contains all of the elements as requires by the Guideline. The manager shall ensure training of key personnel occurs and that persons are able to state verbally their responsibilities in the event of an emergency.

Yours truly,

Cheryl Pocklington

Sr. Inspector of Mines, Ergonomics

cc: Al Hoffman, Chief Inspector of Mines

Stephen Rothman, Senior Inspector of Mines Greg McLean, Senior Mechanical Inspector

Tania Demchuk, Senior Environmental Geoscientist

Charlie Rueger, Mount Polley OHSC