

DATE: September 11 2014

TO: Tania Steele

FROM: Eshetu Beshada, Ph.D., P.Eng.
Environmental Engineer
Mines and Wastewater Section
123 Main Street
Ste. 160 Union Station
Winnipeg, Mb R3C 1A5
Ph:204 945-7023

SUBJECT: **Urbanmine Inc. – Information for Public Registries**

Tania,

Please find attached additional public correspondence and Urbanmine's response to EAP review comments/ concerns related to the Urbanmine Inc file (5684.00) for distribution to the public registries. The documents included are:

Public Comments

- August 23, 2014 email from Dan McInnis, 2 pages with attachment
- July 10, 2014 a letter from Bryan Gray Law, 2 pages

Urbanmine Response

- August 15, 2014 a letter from Dave Ediger, 4 pages

8 pages total

Thank you.

Eshetu Beshada, Ph.D., P. Eng.

Beshada, Eshetu (CWS)

From: Dan McInnis [<mailto:mcinnis.dan@gmail.com>]

Sent: August-23-14 12:07 PM

To: Labossiere, Don (CWS); Braun, Tracey (CWS)

Subject: Urbanmine Flyer

You probably know about this already but this flyer showed up at my door last week. We live quite a distance from Urbanmine so there is no real impact on us. Looks like fun!

Dan

Protect Our Neighbourhood

Lindenwoods is threatened by UrbanMine a polluting industry seeking a provincial environmental license

Air pollution - Dust - Noise - Fire - Explosion

PUBLIC MEETING

WEDNESDAY, SEPT 10 at 7:00 PM
LINDEN WOODS COMMUNITY CENTRE

THE HON. GORD MCINTOSH, MINISTER OF CONSERVATION AND WATER
STEWARDSHIP HAS BEEN INVITED

Please check our website or call to find out more

P R O T E C T L I N D E N W O O D S . C A

CONTACT: JOHN PAVAO
277 Deer Run - Linden Woods (204) 487-0454

BRYAN R. GRAY LAW

DEDICATED CLIENT SERVICE

6 SELWYN PLACE WINNIPEG MB R3T 3N1
204.487.3441 T. 204.894.7242 C. BRYAN@BRGLAW.CA

July 10, 2014

Mr. Eshetu Beshada
Environmental Approvals Branch
Department of Conservation and Water Stewardship
Province of Manitoba
Suite 160-123 Main Street
Winnipeg, MB
R3C 1A5

Dear Sir:

Re: UrbanMine Inc. File 5684.00

I wish to pursue some matters noted in my letter transmitted to you electronically on June 30, 2014 in further detail.

In the above noted letter, I requested several studies be undertaken and that a public consultation and ultimately a hearing be convened in order to share information, build public trust in the findings of the studies and seek resolution thereof.

In the interim, I have sought the sage wisdom of Mr. Mike McKernan, who is an accomplished and very esteemed colleague in the field of environmental engineering who is very experienced in such matters of assessing risk to the environment and human health and who has been instrumental in building consultative processes to accomplish the above noted goals in the context of concerned citizens and environmental assessment in collaboration with Manitoba Conservation and Water Stewardship.

It has been shared with me that constructive work was undertaken by the applicant sponsoring studies and a consultative process with concerned citizens in areas including Stoney Mountain where contaminated groundwater from Bristol Aerospace was a concern; Portage la Prairie with McCains food expansion and in Transcona where Palliser Furniture was causing neighbourhood impacts.

The applicant funds the work and consultants and counsel are able to work together to build a process where citizens express fears and concerns for their safety and well-being and scientific studies are able to bring as much factual information as possible to the table for all interested parties to better inform themselves about the concerns that have been articulated.

I hope such science and fact based work and an open-ended confidence building consultative process could bring positive results to the process that is underway by answering concerns and identifying options to address them.

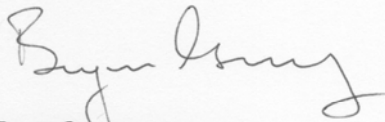
My client and his many concerned neighbours have no information right now other than knowing they live extremely close and downwind of a large industrial operation that works long hours six days a week disrupting their lives and enjoyment of their property and that may be spreading harmful substances across their properties and into their homes. They are also very fearful of the significant risk of fire and explosion that exists so close to their homes.

As noted in my previous letter to you, such a process of study and consultation is explicitly contemplated and allowed to be required of the applicant in the *Environment Act*.

We would be grateful if your office could consider the requirement for such a process of consultation, study and search for options to address impacts and risks prior to any decision about a license or hearing.

Thank you very much for your consideration of these important matters which I would be very pleased to discuss with you in greater detail if you wish.

Yours truly,

A handwritten signature in cursive script, appearing to read "Bryan Gray".

Bryan Gray, B.A. (Hons.), LL.B.

D. Ediger Consulting Services

August 15, 2014

Manitoba Conservation and Water Stewardship
Environmental Approvals Branch
Attn.: Eshetu Beshada, PhD, P.Eng.
Suite 160 – 123 Main Street
Winnipeg MB R3C 1A5

Dr. Beshada:

Re: Urbanmine Inc., Environment Act Proposal, File No. 5684.00
Response to Public and TAC Comments

Urbanmine staff has reviewed the comments that you provided to Mr. Ron Lussier on July 9, 2014 in reference to the Environment Act Proposal submitted by the company for the continued operation of their scrap metal processing facility located at 72 Rothwell Road in the City of Winnipeg. Urbanmine has requested that I submit the following responses on their behalf.

The following sections have been prepared in response to the comments received by Manitoba Conservation in reference to the Environment Act Proposal submitted by Urbanmine Inc. for the continued operation of a scrap processing facility located at 72 Rothwell Road in the city of Winnipeg

1. Office of the Fire Commissioner

The comment indicates that an updated Fire Safety Plan is to be submitted to the local fire authority for acceptance. Urbanmine is in the process of updating the current Fire Safety Plan and Evacuation Plan for the subject site. The revised plan will then be provided to the Winnipeg Fire Paramedic Service for review and consultation.

2. Manitoba Conservation & Water Stewardship – Air Quality

The reviewer makes reference to the handling of mercury switches and lead acid batteries. Mercury switches, which are removed from incoming vehicles, are stored in secure, weather resistant containers pending shipment. Details were not provided in the Environment Act Proposal on the management of lead acid batteries as this issue is addressed in Dangerous

Goods Handling & Transportation Act Licence 237 HW RR, which was issued to Urbanmine Inc. in 2010 for the handling and storage of batteries and used oil. Neither mercury switches nor batteries are processed at the Urbanmine site. Both of these items are shipped intact to approved recycling facilities.

3. Manitoba Conservation and Water Stewardship – Water Control Works and Drainage Licensing Section

The reviewer makes reference to the requirement for licensing of any water control works. Section 5.4.2 of the Environment Act Proposal describes the work currently underway by a qualified consultant to study drainage and run-off at the Urbanmine site. If the recommendations resulting from the study include any requirements for water control works, the same consultant will be retained to assist Urbanmine in obtaining any required licenses and permits.

4. Bryan R. Gray Law on behalf of J. Pavao

Paragraph 2 of this correspondence suggests that the Urbanmine operation is not suitable to be located in proximity to a residential area. The Urbanmine site is zoned M3, which is designated for heavy industry under the terms of the City of Winnipeg Zoning By-Law 200/06.

In terms of the adverse effects listed in paragraph 3, Urbanmine is currently in discussion with several qualified consultants regarding the implementation of a sound and vibration study in order to quantify the potential residential impacts from these sources. The facility's hours of operation comply with the Noise Control section of the City of Winnipeg's Neighbourhood Liveability By-Law and Urbanmine is committed to continuing to operate in accordance with the City By-Law and other applicable regulatory requirements. It should be noted that Section 3.4 of the Environment Act Proposal contains an error in that the hours of operation should have specified 9:00 a.m. to 9:00 p.m. on Saturdays for outdoor activities that have the potential to produce a noise nuisance to surrounding properties.

The reference in paragraph 3 to airborne particulate containing metal shavings, metallic granular dusts, etc. does not appear to be supported by a reference to any specific site activity. The type of operation undertaken at the Urbanmine facility would not be expected to generate the types of airborne contaminants specified in the letter. Urbanmine is

currently exploring sampling methods for determining if there is any evidence of metallic or hydrocarbon contaminants in the particulate matter generated at the site.

The list of points in paragraph 4 makes reference to battery processing. Batteries are received at the facility intact and are placed indoors on pallets and shrink-wrapped for shipment to a recycler. No battery breaking or dismantling occurs at the Urbanmine site. The risk of release of contaminants from battery handling is considered by Urbanmine to be minimal. The risk of fire or explosion as a result of battery collection is negligible.

The same section makes reference to fire and explosion resulting from vehicles crushing. Section 3.3 of the Environment Act Proposal outlines the steps taken in processing a vehicle prior to crushing. Processing in this manner will minimize any fire risk. The comment also makes reference to fire and explosion at other facilities, implying that a similar risk level may be present at the Urbanmine site. The manner in which vehicles are handled at the Urbanmine site is not equivalent to an auto shredder or large auto wrecking yard and, therefore, this comparison of fire and explosion risk is, in Urbanmine's opinion, not accurate.

5. Petition 1

The areas of concern expressed in the preamble to the petition have been discussed in the preceding section of this response.

6. Petition 2

Many of the concerns expressed in the petition have been addressed in earlier sections of this response. The following specific comments are provided in response to the content of the petition:

- The petition makes reference to a 2012 fire that occurred at the General Scrap facility on Springfield Road. That facility includes a large shredder unit and a substantial inventory of scrapped vehicles on site. According to the report from the Office of the Fire Commissioner, the fire was caused by hot metal fragments from the shredder igniting other debris on the site. Since Urbanmine does not operate a shredder and the number of vehicles stored on site for processing is minimal, the circumstances surrounding the General Scrap fire do not exist at this site.
- The petition mentions the risks associated with battery processing and refers to a fire at a battery recycling facility in Trail, B.C. Since lead acid batteries are only packaged

for shipment at the Urbanmine site, the level of fire and environmental risk will be significantly less than at a recycling facility which physically breaks the batteries down into separate components. In addition, the Trail fire referenced in the petition was at a plant that recycled lithium batteries, which would involve different risk factors entirely. Batteries received at the Urbanmine facility are handled and stored in compliance with the licence issued by Manitoba Conservation under the Dangerous Goods Handling and Transportation Act.

- The petition includes a comment that suggests that there is an impression that vehicle hulks are being cut up in the shear on site. For clarification, some vehicle hulks are run through the portion of the shear that compresses the intact body into a compact bale.
- As indicated in a previous section, Saturday operating hours start at 9:00 a.m. as required by the City of Winnipeg by-law, not at 7:00 a.m. as stated in the petition.

In conclusion, although Urbanmine Inc. recognizes that the operation of a scrap metal facility in proximity to a residential area will undoubtedly cause concern for residents, the company is committed taking all reasonable steps to ensure a safe and environmentally responsible operation which is in compliance with all applicable regulatory requirements.

Sincerely,

A handwritten signature in blue ink that reads "David Ediger". The signature is written in a cursive, flowing style.

David Ediger, P. Eng.

c. Urbanmine Inc.

DATE: September 18, 2014

TO: Tania Steele

FROM: Eshetu Beshada, Ph.D., P.Eng.
Environmental Engineer
Mines and Wastewater Section
123 Main Street
Ste. 160 Union Station
Winnipeg, Mb R3C 1A5
Ph:204 945-7023

SUBJECT: **Urbanmine Inc. – Information for Public Registries**

Tania,

Please find attached additional correspondence to EAP review comments/ concerns related to the Urbanmine Inc file (5684.00) for distribution to the public registries. The documents included are:

Additional Correspondence

- September 8, 2014 letter from Tapper Cuddy LLP, 4 pages
- September 9, 2014 letter from Bryan Gray Law, 3 pages
- September 10, 2014 letter from Bryan Gray Law, 2 pages
- September 10, 2014 email from Tapper Cuddy LLP, 1 pages

10 pages total

Thank you.

Siobhan Burland Ross for
Eshetu Beshada, Ph.D., P. Eng.

BRYAN R. GRAY LAW

DEDICATED CLIENT SERVICE

6 SELWYN PLACE WINNIPEG MB R3T 3N1
204.487.3441 T. 204.894.7242 C. BRYAN@BRGLAW.CA

September 9, 2014

**Tapper Cuddy LLP
1000 - 330 St. Mary Avenue
Winnipeg, MB
R3C 3Z5**

Transmitted Via Email

Attention: Mr. Daniel J. Sherbo

Dear Sir:

Re: Urbanmine Inc.

I am in receipt of your September 8, 2014 letter regarding the above noted matter. I provide legal counsel to Mr. John Pavao.

Your above noted letter refers to my "clients". Please be advised that I have been retained by and provide legal counsel only to Mr. John Pavao. I am therefore not aware of any other communication by other citizens that you reference who may have contacted your client or made comment elsewhere upon this matter.

In response to your comment about your client wishing to discuss my client's concerns, Mr. Pavao has indicated to me that your client is very welcome to join in the neighbourhood meeting being held at 7:00 P.M., Wednesday, September 10th, 2014 at Lindenwoods Community Centre. Your client is welcome to attend and speak, answer questions or simply to attend and observe.

Mr. Pavao sees the participation of your client at this meeting as a positive step in establishing the kind of consultative process we have requested and as helpful in ensuring concerns are heard and facts can be discovered. Your letter is the first indication my client has of the various studies that are underway to identify the potential impacts arising from Urbanmine operations and he sees this work as a helpful step in his concerns being investigated.

My client welcomes the confirmation contained in your letter that there is indeed a risk of "fire and explosion" arising from your client's operations. Mr. Pavao wishes to have these same risks thoroughly investigated by our Department of Conservation with opportunity for public vetting of the work and open discussion of the many factors in the studies.

My client does, in fact, seek "protection" for his family and property in Linden Woods from the risks you admit are posed by your client, however large or small they may be.

Mr. Pavao informs me that he enjoyed several years of residency at his current address in Linden Woods prior to your client commencing operations at 72 Rothwell.

My client also confirms that he has observed bright lights after dark, noise, dust and vibration on many occasions when there is no train present on the nearby railway and on more occasions that when your client indicates a film was being made. These same observations noted herein by my client also pre-date, by a long period of time I am told, any work being done to construct the car dealership you mention.

My client believes that the very purpose of our environmental assessment process in which he is engaged is to give professional and objective study and consideration of all such risks and come to a learned conclusion about whether the risks are acceptable and if so, what if any mitigation measures must be undertaken to minimize any impacts and risks.

The matters you reference arising from the communications of my client are all linked to his personal observations or are linked to public representations of your client on their website or in their advertising or are linked to statements in the report submitted to Manitoba Conservation in support of your client's *Environment Act* licence proposal.

My client assures me that all his communications will accurately depict the "battery recycling" services advertised by your client as being storage and shipping only.

My client will also ensure that his communications clearly indicate that the handling of cars by your client includes "crushing and compacting" as you note but not "shredding".

On the other matters related to the "protectlindenwoods.ca" website url and content and references to the two fires in recent years at the General Scrap car crusher to the north of Winnipeg, my client believes that his communications are honest and fair and represent a very sincerely held concern about a matter of strong public interest that merits public discussion.

Your opinion as to whether General Scrap and Urbanmine are large or small scale car crushers and whether they are comparable size operations has no bearing on what my client has been able to ascertain from taking reasonable steps to inform himself of the facts of the situation.

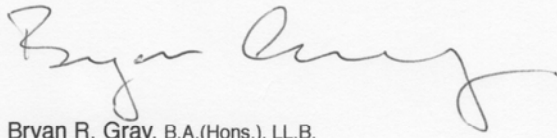
In response to your client's interest in discussing these various concerns, I can tell you that Mr. Pavao will be very pleased to engage in such a dialogue. In fact, in my letters to Manitoba Conservation about this file, it has been requested that a consultative process be established and that the very studies you now indicate are being performed by your client on potential impacts and the risks that concern my client, could be conducted and shared.

As noted herein, my client will ensure all his communications are honest and factually based and accurately reflect your clarification of the services performed by Urbanmine.

Mr. Pavao has also advised me that it is his sincere desire that the discussion at the meeting tomorrow be only to share concerns and ask questions and that it not be a forum to voice factually inaccurate information of any sort.

I hope either the meeting tomorrow evening or another meeting arranged soon can be the start of a constructive dialogue between our clients.

Yours truly,

A handwritten signature in cursive script, appearing to read "Bryan R. Gray".

Bryan R. Gray, B.A.(Hons.), LL.B.

copy: Manitoba Conservation

Beshada, Eshetu (CWS)

From: Daniel Sherbo [<mailto:dsherbo@tappercuddy.com>]

Sent: September-10-14 1:31 PM

To: BRG Law

Cc: Beshada, Eshetu (CWS)

Subject: RE: Letter re: Urbanmine Inc

Mr. Gray,

Thank you for your letters of yesterday and this afternoon.

I believe it is important that I clarify a few items.

In response to your yesterday's correspondence, there was nothing in my letter to you of Monday, September 8th, 2014 that, in my view, would lend support for the conjecture that is found in your letter of June 30th, 2014 (concerning fire, explosion or otherwise).

Further, notwithstanding your assurance in your yesterday's communication, that your client is interested in gaining information and encouraging dialogue with my client, I wish to inform you that Mr. Lussier, the General Manager for my client, received a phone call from your client. During the course of the call, I am told that your client wanted to know Mr. Lussier's home address so that your client could cause a disturbance in front of Mr. Lussier's home. This has certainly given my client quite a contrary understanding of your client's intentions.

Finally, I find it curious that you are concerned about my use of the term "clients" in my September 8th letter. Perhaps you are wanting to be careful not to be seen to have advised any of the other petitioners; notwithstanding that the language in their correspondence or petitions mimics that of your client.

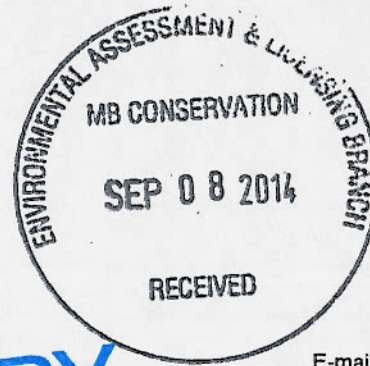
For your information, in using the term "clients", I was referring to Mr. and Mrs. Pavao. I had presumed that Mrs. Pavao had given you similar instructions. I thank you for clarifying that this is not the case.

Regards

Tapper Cuddy LLP

Daniel Sherbo

Direct: 204.944.3274 | Fax: 204.947.2593



September 8, 2014

Via email (pdf)

WITH PREJUDICE

Bryan R. Gray Law
6 Selwyn Place,
Winnipeg MB R3T 3N1

Attention: Mr. Bryan Gray

Dear Sir:

Re: **Urbanmine Inc.**
Mr. and Mrs. John Pavao
Environment Act Proposal, File No. 5684.00
“protectlindenwoods.ca” website

Daniel J. Sherbo
Direct line: (204) 944-3274
E-mail: dsherbo@tappercuddy.com

COPY

Please be advised that we are the solicitors for Urbanmine Inc. (“Urbanmine”).

Our client has contacted us in relation to the above matters. We are very concerned about the steps that your clients have been and are taking with respect to the above.

While we acknowledge that it is every individual’s right to make representation to government bodies with respect to applications such as the application our client is making, particularly when it concerns your clients’ neighbourhood, we are of the view that your clients’ representations, through your office to the Environmental Approvals Branch, through what we believe to be their webpage, and through public engagement, have been misleading, inaccurate and defamatory.

Letter dated June 30, 2014

On behalf of your clients, you authored a letter dated June 30, 2014, to the attention of Mr. Eshetu Beshada at the Environmental Approvals Branch, Department of Conservation and Water Stewardship, Province of Manitoba.

The letter is rife with unsubstantiated allegations meant to inflame and raise undue concerns.

... / 2

As far as the proximity of the "heavy industrial use" to residential properties, the Urbanmine site is and was zoned M3, which is designated for heavy industry under City of Winnipeg Zoning By-law 200/06. It may be appropriate to ask you what due diligence your clients did when they purchased their home. Our client has not rezoned its site. It purchased its property and it was zoned M3 at the time of that purchase.

Further, my client would welcome receiving from your clients any evidence that they have that supports their allegations that Urbanmine is responsible for "noise, vibration, dust, unascertained airborne particulate possibly including but not limited to metal shavings and metallic granular dust, lead, lithium, other heavy metals and hydrocarbons, a significant perceived risk of fire and explosion that causes fear and anxiety to my clients." *[The emphasis is mine.]*

These kinds of allegations are meant to alarm and inflame and, as far as our client has been able to determine, are provided without any serious scientific or other investigation having been performed by you or your clients.

Website and Petitions

In our view, the name of your clients' website, "protectlindenwoods.ca" is, in and of itself, defamatory. It asserts that Lindenwoods requires protection from my client and its business activities.

Further, there are substantial inaccuracies in the website and in the petitions that your clients have filed. They include the following:

1. Urbanmine does not shred cars at its site. It can only be said to crush or compact cars for the purposes of shipping.
2. While Urbanmine accepts batteries, it does not process them at the site. Batteries are placed indoors on pallets and shrink-wrapped. Batteries are handled and stored in compliance with the license issued to Urbanmine by Manitoba Conservation under *The Dangerous Goods Handling and Transportation Act* (Manitoba). They are then sent to licensed recyclers. No battery breaking or dismantling occurs at the site.
3. The fire and explosion risks are minimal. The website makes reference to a fire that occurred at the General Scrap site. The General Scrap facility includes a large shredder unit and a substantial inventory of scrap vehicles on site. According to the report from the Office of the Fire Commissioner, the fire was caused by hot metal fragments from the shredder igniting other debris on the

site. Since Urbanmine does not operate a large scale shredder, and the number of vehicles that are stored at its site is minimal, this is hardly comparable.

4. The hours of operation are in accordance with the City of Winnipeg By-law that regulates Urbanmine. As an aside, in one limited instance, there was a movie, that was permitted, a portion of which was filmed at the site, where there was both a bright light and some 'movie smoke' at the site. We are advised that this 'smoke' consisted of a mixture of mineral oil and water that was put through a vapourizer to create the effect of smoke. The bright (movie) lighting appears on your clients' website as if to suggest that this is a daily occurrence. Any other lighting was in place well before our client purchased the property.

Our Client's Response

Urbanmine is currently awaiting responses to its RFP's for a sound and vibration study.

Suggestions of vibration by your clients could just as easily be attributed to the two train tracks that are to be found between the Urbanmine site and your clients' residence. They may also be attributable to the piling of the new Mercedes Benz dealership that is currently being constructed on Kenaston Boulevard.

Urbanmine is also currently awaiting responses to its RFP's for airborne particulate sampling. It is intended that there be an initial screening of samples on the roof of the building on the east side of the facility and in other representative locations around the perimeter of the site. The findings of the initial screening phase will be used to determine the need for a more rigorous sampling program.

Further, Urbanmine is updating its Fire Safety Plan for acceptance by the local fire authority.

Finally, Urbanmine has been working with a consultant to study drainage and run-off at its site.

Conclusion

Our client would have been happy to discuss your clients' concerns directly in order to attempt to alleviate their fears and anxiety.

However, while one of your clients has phoned a representative of my client, we understand that they have only made complaints and threats, leaving open no avenue for reasonable discussion. Instead, they have proceeded down a destructive and defamatory course of action intended to inflame the situation.

It is our understanding that a meeting is to be hosted by your clients at the Lindenwoods Community Centre on September 10th, 2014. If any defamatory or unsubstantiated allegations or statements should be made by your clients at that meeting, we have instructions to commence proceedings against your clients.

Further, with respect to the website as it is currently constructed, our client is considering its options. We have recommended that a claim be commenced for defamation which would include a claim for damages but which would also include a request for an order that the website be taken down. Every day that the website remains accessible to the public is another day that causes damage to our client.

Kindly advise your clients accordingly.

Yours truly,

TAPPER CUDDLY LLP

Per:

DANIEL J. SHERBO

/lp

✓ cc: Manitoba Conservation and Water Stewardship
Environmental Approvals Branch
Attention: Mr. Eshetu Beshada, PhD, P. Eng.
(Delivered)

BRYAN R. GRAY LAW

DEDICATED CLIENT SERVICE

6 SELWYN PLACE WINNIPEG MB R3T 3N1
204.487.3441 T. 204.894.7242 C. BRYAN@BRGLAW.CA

September 10, 2014

**Mr. Eshetu Beshada
Environmental Approvals Branch
Department of Conservation and Water Stewardship
Province of Manitoba
Suite 160-123 Main Street
Winnipeg, MB
R3C 1A5**

Transmitted Via Email

Dear Sir:

Re: UrbanMine Inc. File 5684.00

Further to my letter to you of June 30, 2014 on behalf of Mr. John Pavao of Linden Woods, it has just been brought to his attention this week by means of correspondence from legal counsel to Urbanmine Inc. that their operations only collect, package and ship used batteries.

My client had understood that the Urbanmine Inc. "recycled" (as advertised on the internet) batteries thus leading him to believe that there was actual dis-assembly of various batteries with their various parts being processed in some manner.

This led to concerns in my above noted letter being voiced regarding the potential for heavy metal contamination of the industrial site and related surface run-off and airborne dust carrying these same metals downwind.

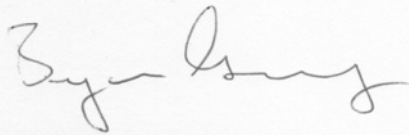
In light of this new information, it is important for me to clarify that the concerns of Mr. Pavao voiced in my June 30, 2014 letter to you regarding airborne metals from batteries would be limited to such arising from the risk of large quantities of batteries that may be stored on site being subjected to fire and explosion.

I very much regret any false impressions of the of the activities underway at Urbanmine Inc. and the risks arising therefrom that were left on the record from my June 30, 2014 letter.

As helpful as the letter from the legal counsel to Urbanmine Inc. was for my client to learn more about their industrial activities, I suggest this speaks to the need for a consultation process to be mandated by your Department in order to share information, conduct the various studies required to find out what environmental impacts and risks are present and if and how they can be mitigated.

Thank you again for your consideration of these important matters.

Yours truly,

A handwritten signature in cursive script, appearing to read "Bryan R. Gray".

Bryan R. Gray, B.A.(Hons.), LL.B.

copy: Tapper Cuddy LLP, Attention Mr. Daniel Sherbo