March 12, 2024

Jennie Gjertsen
Manager, Sustainability and External Relations
Coffee Mine Project

By Email: jennie.gjertsen@newmont.com

Re: Coffee Gold Quartz Mining License Application, Completeness Review Information Request

Dear Ms. Gjertsen,

On November 29, 2023, Mineral Resources Branch (MRB) sent Newmont Corporation a letter acknowledging receipt of the Coffee Gold Quartz Mining License Application (the "application") and outlining the regulatory review process. As described in that letter, the first stage of review is to conduct a Completeness Review which may include an information request.

Mineral Resources engaged Yukon government interdepartmental working groups and an external consultant Core Geoscience Services, to review the application. The Completeness Review ensures that the application has been prepared in accordance with relevant Yukon legislation, policies and guidelines and has integrated Decision Document terms and conditions and Proponent Commitments relevant to the quartz mining license.

Yukon Government has reviewed the application materials and determined that additional information is required to support a detailed review of the application. The information required attached to this letter.

The requests made in the attached information request are pertinent to our ability to complete the review of the application. If the information requested is not available or deemed unnecessary by Newmont, a response with expected timelines or rationale for its exclusion is required.

Newmont is encouraged to keep in mind the areas of overlap between the Quartz Mining License application process and the Water License application process, to ensure responses to the Mineral Resources Branch and the Yukon Water Board are consistent.

Once you have taken the time to consider the contents of this letter and its attachments, please confirm your estimated timeline for response. Should you have any questions please do not hesitate to contact myself or Andrea Kenward at andrea.kenward@yukon.ca.

Sincerely,

for/ Erin Dowd
Manager, Major Mine Licensing

CC: Sidney Schafrik, Tr'ondëk Hwëch'in
Odin Miller, White River First Nation
Bob Freedman, White River First Nation legal counsel
Janet Vander Meer, White River First Nation
Kevin McGinty, Selkirk First Nation

Enclosed: Information Request 1: Completeness Review
Greenhouse Gas Monitoring and Reporting Requirements

Information Request 1 – Completeness Review

This information request is issued to Newmont Corporation with respect to their Quartz Mining License application (the "application") for the Coffee Gold Mine. This information requests pertains to the whole application.

Several updates to the application plans are required in this information request and have been identified as necessary. Updated plans must include a concordance table that demonstrates how Decision Document terms and conditions and proponent commitments have been met and must indicate how and where information requirements have been addressed.

1. General Application Comments

A number of comments identified are general in nature and apply broadly to many different plans and reports provided in the application. These comments have been summarized below.

1.1. Decision Document Concordance Table

The Decision Document concordance table that was provided and replicated in each plan was found to contain errors and inconsistencies with respect to plan references, and referenced material that was not submitted as part of the application.

The concordance table is used to locate where information is included within the application, cross reference application material that is contained in multiple sections and to ensure that the Decision Document terms and conditions have been adequately addressed in the application, as such a complete and accurate table is an important tool for our review.

IR1-1: Revise and submit an updated concordance table which addresses the following items:

a. Consistent references to plans in the same naming convention and nomenclature as the submitted application,
b. Correction to plan and appendix references to reflect application documents submitted for review,
c. Ensure section references are correct within each plan and appendix referenced.

IR1-2: Provide the "Newmont Coffee Grievance Mechanism" identified in the table in reference to Section 110 #l.

IR1-3: Provide the "Health and Safety Program" identified in the table in reference to Decision Document term and condition #41.

1.2. Yukon Legislation and Guidance Material

Quartz mining is multi-disciplinary and is governed by *the Quartz Mining Act*, *Waters Act*, *Environment Act*, *Workplace Safety and Compensation Act* and respective regulations. The activities proposed in a Quartz Mining License application must adhere to all relevant legislation and policies and consider any relevant Yukon-specific guidance that has been developed.

The application submitted references out of date legislation and does not consistently address the guidance or reference the relevant Yukon-specific guidance documents. Where Yukon-specific guidance does not exist, or where Newmont has suggested alternative guidance is more protective, application of standards from another jurisdiction may be adopted.

IR1-4: Ensure the following plans reference and are consistent with, the Workplace Safety and Compensation Act

a. Emergency Response Plan,
b. Spill Contingency Plan,
c. Explosives Management Plan,
d. Waste and Hazardous Materials Management Plan

IR1-5: Ensure the following plans reference, and are consistent with, the 2025 Yukon Ambient Air Quality Standards (https://yukon.ca/sites/yukon.ca/files/env/env-yukon-ambient-air-quality-standards.pdf).

a. Air Quality and Greenhouse Gas Management Plan

IR1-6: Provide confirmation that the following Yukon guidance documents were considered during the development of the application materials and referenced clearly.

a. Guidelines for Developing Adaptive Management Plans in Yukon: Water-Related Components of Quartz Mining Projects,
b. Yukon Guide for Developing Water Quality Objectives and Effluent Quality Standards for Quartz Mining Projects,
c. Plan Requirement Guidance for Quartz Mining Projects,
d. Reclamation and Closure Planning for Quartz Mining Projects,
e. Guidelines for Mine Waste Management Facilities

IR1-7: Where guidance from other jurisdictions is used in lieu of Yukon-specific guidance, provide rationale for the change and demonstrate that the use of the proposed guidance will maintain or improve mitigation measures for the project.

1.3. Standard Operating Procedures

Throughout many of the plans provided, Standard Operating Procedures (SOPs) are frequently referenced but not provided. Standard Operating Procedures provide detail on repetitive

actions and processes that are required throughout the life of the project and the procedures that will be followed to ensure consistent implementation, performance, and results. The details typically provided in SOPs will be required to complete the Detailed Review of the application to ensure the mitigation measures proposed in the monitoring and management plans are appropriate and will be effective for the project.

IR1-8: Where Standard Operating Procedures are referenced in a plan, provide the referenced SOP.

IR1-9: If an SOP is not available, provide a summary of the actions that would be included in that plan and a timeline for when the SOP will be made available.

2. Socio-Economic

2.1. Socio-Economic Monitoring and Reporting Plan

As the Decision Document contains numerous socioeconomic terms and conditions, and as Part 2 of the *Quartz Mining Act* requires Yukon to consider socioeconomic values when considering an application, we have determined that this Quartz Mining License application requires the submission of a Socio-economic Monitoring and Reporting Plan.

We understand that Newmont has developed a socio-economic monitoring program for the Coffee Gold Project, and that Newmont is in conversations with affected First Nations on the development and implementation of this program. As discussed with Newmont, this program, while marked as draft and with the understanding that it will be revised through conversation with First Nations, would be acceptable for the purpose of the application.

IR1-10: As part of the application, Newmont is required to submit a plan that addresses the terms and conditions in the Decision Document and the commitments made throughout the assessment.

IR1-11: Ensure the submitted plan includes monitoring methods to support the assessment of noise mitigation effectiveness as proposed in the Noise Management Plan.

2.2. Heritage Resource Protection Plan

As written the scope of impacts for the construction phase of the project are dispersed in the document and not clearly presented for review.

IR1-12: Provide a summary of the extent of impacts caused by the project and list the project activities that will cause those impacts.

2.3. Noise Management Plan

In the absence of Yukon-specific noise requirements, we rely on best practice documents when conducting our review. One such document, that we recommend Newmont consult during the course of the application process, is the "Guidance for Evaluating Human Health Effects in Impact Assessment: Noise" (Health Canada, December 2023) with a specific focus on Section 6 "An Approach for Assessing the Health Impacts of Noise".

In the Noise Management Plan, it states that mitigations presented are at a conceptual level but it is not clear how Newmont intends to advance the complexity of the mitigation strategies in subsequent submissions.

IR1-13: Provide a timeline for how and when Newmont proposes to advance the mitigations beyond a conceptual level.

IR1-14: Include adaptive measures for noise management and mitigations that may result from a review of effectiveness through the proposed socio-economic monitoring plan.

3. Worker Health and Safety

3.1. Emergency Response Plan

Yukon Government's 2013 Plan Guidance provides guidance on the development of Emergency Response Plans and requires the inclusion of a "return to work program". This program is intended to describe how an employee will be supported in their return to work following a workplace incident, this program or a description of similar protocols is not included in the plan submitted with the application.

The Emergency Response Plan is required to describe the training, measures and resources available at the project to respond to all levels of emergencies that may occur on a mine site. The Coffee Gold Project includes an access road, the Northern Access Route, that will be used to transport supplies and fuel to the mine site. While the construction and use of the access route does not form a part of the Quartz Mining License application, emergency response to accidents and malfunctions on the route may rely on mine site resources and personnel. The Emergency Response Plan should include any response measures and resources that will be provided by the mine site for accidents and malfunctions on the access route.

IR1-15: Provide an update to the plan to include ice rescue response and training as it relates to ice-road crossings at barge landings.

IR1-16: Provide an update to the plan to include a return-to-work program including when the program will be initiated, procedures that will be followed when developing the plan, how the worker and Yukon Worker's Safety and Compensation Board will be involved, and how follow-up of the program will be conducted.

3.2. Explosives Management Plan

The Explosives Management Plan only provides conceptual layout drawings for all explosives-related facilities and does not provide sufficient detail to understand where explosives will be stored and how they will be managed across the site. This information is needed to confirm explosives management meets best practices for workers health and safety and to ensure facilities meet requirements under Yukon regulations, such as the Workers' Safety and Compensation Board Regulations.

IR1-17: Provide specifications and drawings for all explosives-related facilities.

4. Environmental Monitoring and Management

4.1. Site Characterization Plan

The Site Characterization Plan is an integral component of a Quartz Mining License application as it summarizes the environmental conditions of the site and provides the basis for the assumptions and designs that support the development and operation of the project.

The Site Characterization Plan submitted with the application included baseline data collection up to 2021 and earlier for certain disciplines, although the application was submitted in 2023. No additional baseline data from 2021-2023 was considered in the submitted Site Characterization Plan.

Our review of the Site Characterization Plan has identified a need for additional information with respect to permafrost conditions and the thermal analyses. The Coffee Mine project area is underlain by discontinuous permafrost, which plays a role in the design, development and closure of many project components at the mine site. While permafrost characterization has been performed it is unclear how this information is being applied. Permafrost conditions and information, in relation to the design, operation and construction of infrastructure, must be connected and overlayed with climate change considerations, and natural hazards, and should be present with georeferenced figures.

Permafrost depths are described as ranging from 30 m to 165 m deep at 0—2C. It is not clear where the permafrost thickness changes and how these variations are associated with the proposed footprint of facilities and infrastructure. The understanding of the potential effect of permafrost on design and construction of infrastructure and facilities would benefit from a map that depicts the distribution and depths of permafrost with respect to the proposed project general arrangement. Note the maps in Appendix A (e.g., Figure 3c) appear to provide an earlier iteration of the general arrangement, not the one presented in the application.

The 2016 Tetra Tech permafrost and terrain mapping report provides very detailed information but on older footprints of the project components (waste rock storage facility, heap leach facility, etc.). Updated maps with the current mine footprint did not show the same level of detail.

IR1-18: Update the Site Characterization Plan to include baseline data collected in all discipline areas up to and including 2023.

IR1-19: A thermal analysis could not be located within the application, provide the thermal analysis and results or describe where this information can be found in the application.

IR1-20: Has the presence of discontinuous permafrost been considered for long-term stability of facilities over areas of ice rich permafrost and in general?

IR1-21: Provide an annotated permafrost distribution map with permafrost depths with the currently proposed general arrangement.

IR1-22: Provide terrain stability and permafrost maps with proposed general arrangement depicting all facilities and infrastructure.

IR1-23: Describe how the permafrost characterization work will be used in design from construction, operations, to closures.

4.2. Environmental Monitoring and Adaptive Management Plan

While Yukon Government's 2013 Plan Requirement Guideline for Quartz Mining Projects provides requirements and expectations for a plan submission, plan development must also incorporate and consider all available Yukon guidance materials. Since the issuance of the 2013 guidance document, the Government of Yukon has issued the Guidelines for Developing Adaptive Management Plans (2021) and the Guidelines for Mine Waste Management Facilities (2023). Both of these documents provide guidance on the development of environmental monitoring and adaptive management for mine sites in Yukon. It was unclear the extent to which application materials were developed in coordination with these guidance materials.

Comprehensive adaptive management plans are expected as a part of Quartz Mining License applications, however, the EMAMP provided only included adaptive management plans for surface

water quality and aquatic life. An adaptive management plan was not provided for groundwater or any other areas within the environmental monitoring programs that would address unanticipated outcomes or ineffective mitigation measures. While comprehensive AMPs are not required for each component of the environmental monitoring program an understanding of available adaptive measures is required.

IR1-24: Provide an analysis of the EMAMP as they relate to the AMP Guidelines and Guidelines for Mine Waste Management Facilities, specifically Appendix G. Where the plan is inconsistent with the guidance documents update the plan or provide rationale as to why the information is not required.

IR1-25: Provide an adaptive management plan for ground water, this plan is to take into consideration the AMP Guide.

IR1-26: Provide adaptive management strategies for environmental monitoring programs that have measurable and actionable criteria, include additional information on how mitigation measures will be measured for effectiveness and the thresholds or triggers that will be established to identify required changes.

IR1-27: Clarify the meaning of "unanticipated outcomes" in the statement on page 17 of the EMAMP and describe thresholds for monitoring results which would warrant the development of new adaptive management strategies.

IR1-28: For Appendix D, provide details of the planned methodology to update intensity and frequency predictions for extreme events and other climatic performance predictions for the project.

4.3. Air Quality and Greenhouse Gas Management Plan

In 2020, Yukon government released Our Clean Future: A Yukon strategy for climate change, energy and a green economy. "Area #6: Innovation" of Our Clean Future targets reducing the carbon intensity of mining. A first step in meeting that goal is delineating the greenhouse gas emissions from our currently operating mines – Action I7:

> *"Require quartz mines to project their anticipated greenhouse gas emissions, identify measures to reduce emissions, and annually report greenhouse gas emissions through the quartz mine licensing process beginning in 2022."*

Accordingly, Mineral Resources Branch has made changes to the annual reporting requirements under Quartz Mining Licenses to meet this commitment. Enclosed is a document that outlines the greenhouse gas emissions information we are requiring from operators. As part of the application, Newmont will be required to incorporate this information into your application.

As discussed in section 1.2 of this information request, the application should at all times apply Yukon standards and guidance whenever possible unless rationale for a more stringent approach is provided.

IR1-29: Update the plan to incorporate greenhouse gas emissions monitoring and reporting requirements.

IR1-30: Update plan with Yukon Ambient Air Quality Standards for PM10.

IR1-31: Specify which indoor air quality guidelines are being referred to, as well as any threshold limits.

4.4. Wildlife Management Plan

The Wildlife Management Plan has been completed only as a high-level summary and does not appear to be wholistic, and is missing some detailed information, which is necessary for a complete review. It is our understanding that Newmont has a revised plan currently undergoing consultation with affected First Nations.

In order to address a number of concerns raised during Yukon Government's review and ensure consistency with work being completed through the Section 110 #A Steering Committee and Technical Working Group, we recommend scheduling a dedicated meeting between Yukon Government reviewers and Newmont to discuss the requirements of the Wildlife Management Plan. In follow-up to the issuance of this information request, MRB will contact Newmont to schedule a meeting.

IR1-32: Provide an update regarding the status of and expected submission timelines for Newmont's revised Wildlife Management Plan currently undergoing update between affected First Nations and the company.

5. Environmental Protection

5.1. Waste and Hazardous Materials Management Plan

IR1-33: The 2013 Plan Requirement Guideline for Quartz Mining Projects identifies the requirements for a Waste Management Plan and a separate Hazardous Materials Management Plan. Newmont has combined these topics into one management plan, which is not a concern so long as all of the components identified in the guidance document are addressed. Our review identified areas where the guidance was not fully incorporated, as well as areas where decision document terms were not clearly addressed. Provide an updated Waste and Hazardous Materials Management Plan which addresses the following items:

a. the procedures to store or remove hazardous materials in the event that the mine enters temporary closure.
b. routine inventory management procedures to ensure current and accurate inventory records and labelling of hazardous materials (roles, responsibilities, reporting, frequency, etc.).

IR1-34: Provide an update regarding the status of, and expected submission timelines for, addressing term and condition #24 with an approved landfill materials list.

5.2. Spill Contingency Plan

The 2013 Plan Requirement Guideline for Quartz Mining Projects identifies the requirements for a Spill Contingency Plan. While most items prescribed by the guide were captured in the plan our review identified areas where the guidance was not fully incorporated and additional information is required.

IR1-35: Provide an updated Spill Contingency Plan which addresses the following items:

a. Outline the procedures to identify any leaks, spills, stains, etc. in or around fuel, chemical and hazardous material storage, and transfer areas.
b. Include a description of the spill response procedure for accidents/incidents that have been ignited.
c. Include routine inventory management procedures to ensure current and accurate inventory records and labelling of hazardous materials with potential to spill (roles, responsibilities, reporting, frequency, etc.).

6. Development and Operations

6.1. Guidelines for Mine Waste Management Facilities & Design Criteria

In 2023, Yukon government released Guidelines for mine waste management facilities which describe the minimum expected requirements for the planning, development, operation and closure of mine waste management facilities in Yukon. This guide was released prior to the submission of Newmont's application to MRB but after the assessment phase was completed. As such, Newmont is not required to meet the guidelines expectations for assessment but must meet the expectations for the regulatory process.

Newmont has previously committed to providing an analysis of the application materials as they relate to the guidance document. In the February 28th monthly meeting between Newmont and MRB, Newmont indicated that this analysis would potentially be ready to submit during the

month of March. While this is a commitment made by Newmont, we have included it as a distinct information request as well (see IR1-36).

We have used the guideline during our review of the application and have noted areas in which the design criteria for mine waste management and ancillary facilities, do not meet the design criteria or have not provided enough detail for complete evaluation of design criteria, have not provided all the required information within the guidance and areas that require further clarification. The information requirements below are provided to ensure Newmont is aware of the areas that require additional information that could be addressed in the forthcoming memo.

IR1-36: Use the Guidelines for Mine Waste Management Facilities to:

a. Classify all mine waste management facilities and supporting ancillary infrastructure,
b. Determine the level of design detail for each facility based on the guidelines hazard classification,
c. Compare the requested design detail in the guidelines with the submitted design packages to identify gaps that may exist,
d. Provide rationale if guidelines and criteria are being used from other jurisdictions in place of the guidelines.

IR1-37: Settlement analysis do not appear to have been completed for mine waste management facilities, and the requirement for analysis seems to be a mitigation measure linked to thaw settlement if it occurs. Provide settlement analyses for all proposed facilities, if these analyses have not been completed provide a rationale as to why they have not been completed and how the designs and management plans will ensure physically stable facilities both in operation and during closure periods.

IR1-38: Demonstrate that the hydraulic head on the heap leach pad will be less than 1 meter through moisture content analysis, or otherwise ensure design criteria are developed using hydraulic heads greater than 1m (per Table 5-2 in the 2023 Guidelines for Mine Waste Management Facilities).

IR1-39: Ensure that surface water diversion infrastructure is designed to the appropriate precipitation event.

IR1-40: The event ponds and rainwater ponds supporting the heap leach facility in the application appear to have retaining barriers with heights in excess of 2.5m and capacities in excess of 30,000 m^3, fitting the definition of a dam. Ponds associated with the heap leach facility are to be classified in accordance with Table 4-1 of the guideline, including the Canadian Dam Association consequence classification.

IR1-41: The application notes that the Probable Maximum Precipitation event is developed from a rainfall depth that is 2.5 times larger than the 100-year event but does not provide source for the described method of estimating Probable Maximum Precipitation. Additionally, 2023 MWMF guidance mandates the 24-hr, 500-yr event for Class II facility storage and the 24-hr, 1000-yr event for Class III facility storage. It is not clear how the PMP estimation was completed, or if the event is as conservative, or more conservative than those stated in the guidelines.

a. Include reference to the source or describe the method of PMP estimation,
b. Demonstrate that the chosen PMP event is of equal or greater magnitude than established in the guideline.

IR1-42: Following review and incorporation of the information requests contained in this section, assess whether or not the classification of mine waste management facilities have changed.

6.2. General Mine Arrangement

The general arrangement figures provided in several of the development and operations plans are simplified on both the local and regional scale maps and do not provide sufficient detail to fully understand the sequencing of all stages of the project. This information is needed for the application to gain a better understanding of the early construction work that will be required and the early stages of mine development as these activities establish the foundation of the mine development and operation. The annual mine sequencing is provided in the General Mine Development Plan but does not show the entirety of the mine-site footprint and all the development that will occur in support of these early activities (i.e. construction of new road, material handling, winter haulage plans, etc.)

IR1-43: Provide updated maps and figures that capture:

a. General arrangement of the existing and proposed mine-site footprint that depicts all facilities, associated infrastructure and the total potential area of disturbance,
b. Sequencing of construction and development with overlaid topography, terrain hazards, and other important biogeophysical conditions of the mine-site footprint,
c. Inclusion of the road network (construction of new road, upgrading existing roads, material handling, winter haulage, etc.) within the mine-site footprint,
d. Cyanide handling and storage facility detailed layout drawings.

6.3. General Mine Development Plan

The General Mine Development Plan must describe all aspects of the mine site as it develops through construction, operations, and into closure. The construction period of the mine development is especially important when considering an application for a new quartz mining project. As presented, the application does not provide sufficient information to understand the activities and components during the construction period; the maps, figures and summary descriptions provide a general understanding of the infrastructure and facilities during operation, but do not describe in enough detail the progression of the overall footprint being disturbed throughout the life of mine.

IR1-44: Provide traffic management and transportation infrastructure descriptions (road networks, onsite traffic management from open pit hauling, etc.) for all stages of the project.

IR1-45: Provide locations and descriptions of all borrow sources that will be accessed on the mine site to support the construction of the mine site. lf materials are sourced off-site provide information as to the quantity of material required from off-site material and confirmation that the characterization of material will be conducted in the same manner as material sourced on-site.

IR1-46: Provide identification of all laydown, landfill, and septic/sewage system locations that will be required in the construction, development and operation phases.

IR1-47: Provide estimated quantities for topsoil, overburden, and granular materials collected from areas other than the major facilities; or cut and fill volumes for roads and areas to be cleared and graded.

IR1-48: It is unclear if all topsoil and organics will be hauled to the stockpile adjacent to the heap leach facility or if there will be additional stockpile locations utilized on the mine site. Provide additional information on the hauling and storage of topsoil and organics.

6.4. Mine Operations Plan

The 2013 Plan Requirement Guideline for Quartz Mining Projects outlines the requirements for a Mine Operations Plan. Our review identified areas where the guidance was not fully incorporated.

IR1-49: Provide an updated Mine Operations Plan which addresses the following items:

a. Provide the schematics of the pit, pit stages and final pit designs,

b. Provide diagrams of the typical bench loading configurations,
c. Provide descriptions of how ore will be handled on site, including location and design of stockpiles, segregation protocols, stockpile inventories, and projected life of stockpiles

6.5. Heap Leach and Process Facilities Plan

The Heap Leach and Process Facilities Plan provides details about the design, construction, and operation of the heap leach facility. While most information requirements identified in the guidance material were captured in the plan our review identified areas where the guidance was not fully incorporated or further documentation and clarification is required.

IR1-50: Provide an updated Heap Leach and Process Facilities Plan which addresses the following items:

a. Provide inflow hydrographs for all facilities that store water,
b. Provide flood routing capacity for all facilities that store water,
c. Provide the quality assurance and quality control measures that will be implemented for the construction period. This should include, but not be limited to, foundation preparation, permafrost identification and mitigation, soil liner placement, compaction, and moisture conditions.
d. Provide reports on cyanide destruction tests performed on column leach solutions, as reported on in the application,
e. Update figures missing title blocks or identifier labels, and corresponding references within the plan

IR1-51: A Kappes, Cassiday & Associates report entitled “Report of Metallurgical Test Work, Coffee Gold Project” was referenced in the plan, but was not included in the application for review. Provide the referenced report to support the review of heap leach operations.

6.6. Waste Rock and Overburden Management Plan

The Waste Rock and Overburden Management Plan provides details about the design, construction, and operation of all waste rock and overburden storage facilities. While most information requirements identified in the guidance material were captured in the plan our review identified areas where additional information is required with respect to development and sequencing of the facilities.

IR1-52: Provide an updated Waste Rock and Overburden Management Plan which addresses the following items:

a. Provide a detailed construction schedule that demonstrates the sequencing needed to complete the rock drain,

b. Provide the proposed design schedule for the Alpha Waste Rock Storage Facility,

6.7. Water Management Plan

The Water Management Plan, while not required by the 2013 Plan Requirement Guideline, provides critical information on how ancillary project components play a role in the stability of mine waste management facilities and the mine site in general. As presented, the application does not provide sufficient information to understand the Halfway Creek Diversion during the construction period through closure.

IR1-53: Provide designs for the Halfway Creek Diversion which depict cut/fill representations, material balances, and longitudinal profiles.

IR1-54: Describe how permafrost has been addressed in the design for the Halfway Creek Diversion, specifically considering the cut slopes.

IR1-55: Provide description on how drainage, previously captured by the Halfway Creek Diversion, will be managed or monitored once the diversion has been reclaimed or describe where this information can be found in the application.

7. Reclamation and Closure

The submission of reclamation and closure plans in Yukon is guided by the 2006 Yukon Mine Site Reclamation and Closure Policy, 2013 Reclamation and Closure Planning for Quartz Mining Projects and the 2023 Guidelines for Mine Waste Management Facilities. The Reclamation and Closure Plan submitted with the application references the 2006 and 2013 and provides a concordance table in relation to the 2013 guidelines but does not reference the 2023 guidelines. In addition to the guidance document referenced above, the 2013 Plan Requirement Guidelines includes a requirement to provide a progressive reclamation effectiveness monitoring program to inform closure measures; this program has not been included in the application.

The Plan describes the closure scenarios and measures once operations commence and describes closure measures required if closure occurred during operations or at end of mine life but does not address closure measures and requirements at any point prior to commencement of operations. Information about the construction period is required to ensure the required closure and reclamation measures are well understood in the event of an early closure and captured within the cost estimation for the initial years of a Quartz Mining License.

As active mine water treatment system for the project will be in place during operations as well as through the early closure periods; a semi-passive treatment system may also be required

and is included in the application. The application has provided information on the planned components of the active treatment system including the research conducted to date and has indicated that additional investigations are underway for both the active and semi-passive systems to demonstrate that these proposed systems will be sufficient to meet EQS and WQOs in the receiving environment during all project phases. Additional information on the water treatment processes is required to understand the closure measures for mine waste facilities, and particularly the heap leach facility.

IR1-56: Update the reclamation and closure plan to include the construction period. This should include, but not be limited to, the following:

a. Planned closure and monitoring activities,
b. Reclamation and closure measures required to achieve closure objectives,
c. General arrangement and site condition figures that show project development and infrastructure during the construction period

IR1-57: Provide a progressive reclamation effectiveness program that will monitor the progressive reclamation measures that Newmont has committed to in the RCP.

IR1-58: Provide the timing, frequency and participants for the review of the closure alternatives assessment proposed in Section 2.1.

IR1-59: Runoff is calculated using 2014-2018 and 2017 values depending on catchments and peak flows use data up to 2017. As required in (IR1-18) provide updated runoff calculations using data up to and including 2023.

IR1-60: Provide additional information on reference sites using full scale electrochemical bioreactor systems at mining operations including upstream pre-treatment, size, treatment performance (feed and effluent water flow and quality), and main consumables (power and reagents).

IR1-61: Provide additional information on the retention times and nutrient dosages that will be required to treat heap leach solutions for the active and passive treatment processes.

IR1-62: Provide a copy of the security spreadsheet that is not password protected to enable use of this spreadsheet in the detailed review and analysis of the cost estimate.

1. Introduction

In 2020, the Government of Yukon released Our Clean Future: A Yukon strategy for climate change, energy and a green economy. "Area #6: Innovation" of Our Clean Future targets reducing the carbon intensity of mining. A first step in meeting that goal is delineating the greenhouse gas emissions from our currently operating mines – Action I7:

> *Require quartz mines to project their anticipated greenhouse gas emissions, identify measures to reduce emissions, and annually report greenhouse gas emissions through the quartz mine licensing process beginning in 2022.*

Accordingly, operators are requested to provide the information below as part of the Annual Report required under the Quartz Mining License.

2. Information Requirements

2.1 Provide the following information on fuel use throughout the reporting year.

Where it is reasonable to do so, please distinguish between fuel volumes used for mining operations, exploration activities, and closure activities.

	Volume delivered to site (in Litres)	Renewable Fuel Content (%)	Development/ production activities (in Litres)	Exploration activities (in Litres)	Closure activities (in Litres)
Heating Fuel (oil)					
Heating Fuel (propane)					
Heating Fuel (other)					
Aviation Fuel (Jet A)					
Aviation Fuel (Jet B)					
On-site transportation (diesel)					

	Volume delivered to site (in Litres)	Renewable Fuel Content (%)	Development/ production activities (in Litres)	Exploration activities (in Litres)	Closure activities (in Litres)
On-site transportation (gasoline)					
Off-road transportation (diesel)[1]					
Off-road transportation (gasoline)					
Off-site transportation (diesel)[2]					
Off-site transportation (gasoline)					
Electricity production (diesel)					

2.2 Provide the following information for electricity purchased or generated on site.

Source	kWh Energy
Purchased from grid	
Produced using diesel	
Produced using LNG	
Produced using renewable resources (e.g. solar, wind)	

2.3 Report the hectares of land clearing undertaken throughout the reporting year attributed to exploration, production and closure.

[1] E.g., exploration activities.
[2] E.g., personnel and supplies transport to and from site; concentrate/product transport on Yukon roadways.

2.4 Describe activities undertaken throughout the reporting year to reduce project emissions.

a) Describe future options to reduce greenhouse gas emissions.
b) Describe how you will evaluate options for greenhouse gas reductions.

2.5 Provide projections for greenhouse gas emissions for the next 10-years. Identify the expected stage(s) of operations throughout the 10-year projection period.

2.6 Identify any federal or territorial incentive programs that have been accessed to assist in the reduction of emissions.

2.7 Identify any financial or other support provided by the Licensee to help community or territorial efforts to reduce emissions.