



December 23, 2025

Jasmin Dobson
Vice-President Environment and Permitting
Coffee Mine Project

By Email: jdobson@fuertemetals.com

Re: Coffee Gold Quartz Mining License Application, Information Request 2 - Detailed Review: Phase 1

Dear Ms. Gjertsen,

On May 21, 2025, Mineral Resources Branch (MRB) sent Newmont Corporation a letter confirming that the Coffee Gold Quartz Mining License Application (the “application”) had been deemed completed and was ready to proceed to Detailed Review and consultation with affected First Nations.

The Detailed Review of the application is following a phased approach, separating the documents into six distinct phases. MRB is engaging Yukon government interdepartmental working groups, an external consultant Core Geoscience Services, and affected First Nations to review the application. During the review of Phase 1 plans, it was identified that additional clarification, supporting data, and/or revisions are required to ensure compliance with relevant Yukon legislation, policies and guidelines and the integration of Decision Document terms and conditions and Proponent Commitments relevant to a quartz mining license.

The requests made in Information Request 2 (attached) are pertinent to our ability to complete the review of the application. If the information requested is not available or deemed unnecessary by Fuerte, a response with expected timelines or rationale for its exclusion is required.

December 23, 2025

Page 2 of 2

Fuerte is encouraged to keep in mind the areas of overlap between the Quartz Mining License application process and the Water Licence 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,

A handwritten signature in black ink, appearing to read 'M. Nordling', with a stylized, cursive script.

Monica Nordling

A/Manager, Major Mines Licensing

CC: Jennie Gjertsen, Fuerte Metals Corporation
Katie Fraser, Tr'ondëk Hwëch'in
Odin Miller, White River First Nation
Kevin McGinty, Selkirk First Nation

Enclosed: Information Request 2 - Detailed Review: Phase 1

Information Request 2 - Detailed Review: Phase 1

The Mineral Resources Branch (MRB) has completed a detailed review of the Phase 1 materials submitted as part of Fuerte Metals' Quartz Mining License application (the "application") for the Coffee Gold Mine. This information request pertains to the following plans:

- General Mine Development Plan
- Mine Operations Plan
- Emergency Response Plan
- Explosives Management Plan
- Waste Rock and Overburden Management Plan

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.

MRB acknowledges Yukon Government's letter dated December 5, 2025, to Fuerte Metals regarding the implementation of the Independent Review Board (IRB) recommendations. The December 5 letter outlines Yukon Government's expectations and requests for information related to each IRB recommendation. Fuerte Metals is required to provide the information specified in that letter for the regulatory review process and future operational phases of the project.

Information Request 2 (IR2) is complementary to the December 5 letter and does not duplicate its content. MRB requests that, in addition to responding to the December 5 letter, any necessary updates to application materials be completed in coordination with updates resulting from this information request to ensure consistency.

Timely submission of all requested information is essential to avoid delays in the regulatory review process.

1. General Application Comments

The following comments and requirements apply broadly to multiple plans and reports submitted as part of the Coffee Gold application. These updates are necessary to ensure compliance with Yukon legislation, guidance, and best practices.

1.1. Corporate

Numerous sections of the management plans reference “Newmont Global Corporate Standards” and other corporate-specific commitments, procedures, and roles that are not considered sufficiently detailed for this stage of the regulatory review. In addition, with the recent change in ownership from Newmont Corporation to Fuerte Metals, all submitted management plans must reflect the new corporate structure, governance framework, and operational accountabilities.

Accordingly, Yukon Government requests that the Proponent undertake the following updates to all plans included within the Phase 1 review. In recognition that the remaining plans associated with subsequent phases of the application review have already been submitted, Yukon Government will issue corresponding information requests for those phases, as appropriate, to ensure consistency across all management plans.

- IR2-1:** Replace all references to Newmont Corporation - including corporate standards, policies, procedures, commitments, governance documents, and internal reporting structures - with those of Fuerte Metals, where applicable.
- IR2-2:** Revise and update all roles and responsibilities to reflect Fuerte Metals’ organizational structure, including
 - a. operational and managerial roles
 - b. environmental, health, and safety roles
 - c. senior management oversight
 - d. corporate-level accountability and decision-making processes
- IR2-3:** Provide complete descriptions of all corporate standards, guidelines, or procedures proposed for implementation at the Project. Yukon Government reiterates that references to a company’s “global standards” or “corporate requirements” without detailed description of the specific standard are insufficient. Where appropriate, each plan must identify:
 - a. source and version of any standard applied
 - b. key requirements or performance criteria
 - c. implementation, monitoring, and audit processes at site level
 - d. associated training, documentation, and reporting processes
- IR2-4:** Identify and justify any changes to commitments or management approaches resulting from the transition to Fuerte Metals ownership. If changes to methodologies, risk management processes, or monitoring programs are proposed, provide rationale and describe how these changes remain consistent with the scope of the assessment, regulatory requirements and best practice.

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 Yukon legislation and policies and consider Yukon-specific guidance.

Expectations and requirements reflected in this information request regarding level of design are based on the definitions within the Yukon government 2023 Guidelines for Mine Waste Management Facilities (GMWMF). In general, Yukon government expects the design to be completed to Preliminary design level for the quartz mining license. Detailed designs are required for review and approval prior to construction of any facility.

The application materials do not currently reflect all applicable Yukon legislation and reference outdated Yukon-specific guidance documents. Where Yukon-specific guidance does not exist, or where Fuerte proposes alternative guidance as being more protective, the application of standards from another jurisdiction may be adopted only if a clear rationale is provided demonstrating that the alternative maintains or improves mitigation measures for the project.

IR2-5: Ensure references to Yukon guidance documents within application materials are current and accurate.

IR2-6: 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.

1.3. Standard Operating Procedures

Throughout many of the plans provided, Standard Operating Procedures (SOPs) are frequently referenced but not provided. SOPs are essential components of technical management plans, as they describe the detailed, repeatable actions and procedures that ensure consistent implementation, operational performance, and the effectiveness of proposed mitigation measures throughout the life of the project. The information typically contained within SOPs is required to complete the Detailed Review of the application and to determine whether the monitoring and management approaches are appropriate and will be effective throughout the life of the Project.

Yukon Government acknowledges that SOPs may require periodic updates to reflect evolving best practices, operational changes, or site conditions; however, this does not remove the requirement to provide SOPs—at an appropriate level of detail—during the regulatory review process. SOPs form a critical part of understanding how proposed mitigation measures, monitoring programs, and operational controls will be implemented.

To address concerns regarding document flexibility, MRB notes that:

- SOPs may be updated after approval provided that changes do not alter the intent, effectiveness, or regulatory commitments established in the approved management plans; and
- When SOPs relate to activities that will not occur until later in construction, development, or production, it may be appropriate to submit them during operational development.

However, for SOPs that support activities proposed or are necessary to evaluate the feasibility, adequacy, and reliability of mitigation measures in the current regulatory review, the SOPs must be provided prior to plan approval.

IR2-7: Provide all Standard Operating Procedures that are referenced in the plans. If an SOP is not available or is more appropriate for submission post-licensing, based on the timing of the associated activity, please provide justification.

IR2-8: Provide a list of all SOPs intended to be developed and summarize the actions that would be included in that SOP and a timeline for submission of each SOP.

1.4. Provision of Referenced Material and Reduction of Plan Redundancy

Throughout multiple plans numerous references have been made to supporting materials such as design reports, regulatory guidance documents, and technical studies. These referenced materials often contain critical details—such as methodologies, test results, interpretations, recommendations, and design assumptions—that are not fully summarized within the plans themselves.

This information is essential to complete the Detailed Review of the application and to be able to verify that all design and operational decisions are supported by appropriate technical evidence and comply with Yukon regulatory requirements.

IR2-9: Provide all project-specific materials referenced in submitted plans and appendices or clearly indicate where these materials can be found. This includes, but is not limited to:

- a. design reports and engineering studies
- b. geotechnical and hydrogeological investigation reports
- c. geochemical characterization and source term reports
- d. water management and drainage design basis reports
- e. thermal modeling and permafrost characterization studies
- f. QA/QC protocols and monitoring program documentation

IR2-10: Provide references to other application documents/plans where an activity is to be carried out in accordance with (developed based on, characterized by, or described) that plan (e.g., Wildlife Protection Plan, Erosion and Sediment Control Plan). Ensure these references include the Socio-Economic Management Plan, as applicable.

1.5. Heritage Sites

The Executive Committee Review of the Coffee Gold project resulted in a determination that heritage resources and heritage sites in the vicinity of the mine would be impacted unless mitigations were enacted to control or avoid impact. Two archaeological sites, one 1950s era plane wreck, and permafrost rich ground (holding potential for the recovery of paleontological fossils) are located in the general mine areas that are discussed in the General Mine Development Plan (GMDP), Mine Operations Plan (MOP), and Waste Rock and Overburden Management Plan (WROMP). The proponent has indicated that the archaeological sites and the 1950s era wreck will be managed through avoidance and buffering. Furthermore, the chance discovery of paleontological fossils will be managed through monitoring and the implementation of a 'Chance Finds Protocol.' The specific details of heritage site management are detailed in the Heritage Resources Protection Plan.

Notably, the GMDP, the WROMP, and the MOP plan do not make mention of the fact that there are significant heritage management concerns that will affect the implementation of these plans, or that site development will be implemented as detailed in the Heritage Resources Protection Plan. The concern with this omission is that heritage sites are most susceptible to impact during initial construction and subsequent maintenance construction during a mining project. Given that no pre-emptive data recovery mitigations will be completed at heritage sites in the mine area, accidental impacts have the potential to result in the complete loss of heritage value for sites in the mining area.

IR2-11: Revise the GDMP, MOP, and WROMP plans to include where heritage sites are located in the mine area and affirming that these sites are to be protected through out construction, mine life, and final decommissioning of the project. This must include:

- a. reference to the Heritage Resources Protection Plan
- b. confirm heritage sites will be protected throughout construction, operations, and decommissioning. For example, construction planning will take into account review of known management plans, "no work zones," "Special Management Zones (environmental, heritage, etc)," and other construction restrictions that are meant to protect cultural values.

- c. updated all relevant maps to clearly show the location of “no-work zones” derived from other management plans with the objective of creating a cohesive picture of how the mine will be developed and operated accounting for all known protected areas
- d. reference any special management plans that inform and govern the no-work zones
- e. acknowledge permafrost areas may contain paleontological fossils and include reference for monitoring and chance find protocols

1.6. Seismic Modelling

Design events should be updated in accordance with the GMWMF, current seismic modeling, current climate models, and industry best practices. The National Building Code of Canada (7th generation) seismic hazard model indicates a PGA of 0.062 for the Coffee site. This value is also consistent with the MINES Group (2015) Seismic Design Report for the project which reports a PGA of 0.067g for a 475-year return period.

In Phase 1 plans, it appears seismic risk has been assessed generally and referencing regional seismicity would improve contextual clarity and provide more certainty that detailed designs have considered more accurate design event criteria.

IR2-12: Update the seismic design evaluation for all engineered design facilities to include:

- a. consideration of regional seismicity in source zone identification and event probability (within the vicinity of the project)
- b. application of the National Building Code of Canada 7th generation seismic hazard model
- c. confirm site class used to estimate PGA to account for soil stratigraphy in the pseudo-static analysis

2. General Mine Development Plan

The General Mine Development Plan (GMDP) must comprehensively describe all aspects of the mine site as it develops through construction, operations, and into closure. Yukon Government requests that the Proponent undertake the following updates:

While the GMDP includes some description of mine site and haul roads extending from the Yukon River through the mine site operations, it does not include the Yukon River South Barge Landing. This information was included in application materials submitted to the Land Management Branch:

- Access Route Construction Management Plan
- Access Route Operational Management Plan

These plans pertain to the construction and operation of the Northern Access Route and, other than the components for the Yukon River South Barge Landing, are not under the authority of the Quartz Mining License process. The GMDP must be updated to include the Yukon River South Barge Landing and provide more detailed descriptions of construction and operation of roads on the mine site (in the absence of a Road Construction Plan).

- IR2-13:** Revise the plan to include details and figures for mine site roads within the proposed Quartz Mining License footprint, inclusive of:
- a. existing and proposed road locations and construction
 - b. Yukon River South barge landing construction and operation details
 - c. road classification/use (e.g. haul road, mine service road, auxiliary road)
 - d. confirm that construction specifications adhere to applicable standards and regulations
 - e. access control and any restrictions associated with the roads

Additional information required in a plan update:

- IR2-14:** Ensure plan complies with the *Yukon Public Health and Safety Act*:
- a. Eating and Drinking Places Regulations
 - b. Camp Sanitation Regulations
 - c. Drinking Water Regulations
- IR2-15:** Update plan to include roles and responsibilities of key personnel for all primary activities addressed in the plan (e.g. processing, QA/QC, engineering, geotechnical).
- IR2-16:** Describe which infrastructure components located on permafrost terrain have had thermal analyses conducted to date, and which have not. Provide scope and methods for remaining analyses.
- IR2-17:** Identify infrastructure still requiring geotechnical information to confirm design and location. Preliminary designs and location determinations are required for regulatory approvals.
- IR2-18:** Provide all available ground temperature monitoring data through 2025, with detailed discussion and analysis of trends and their significance.
- IR2-19:** Provide detailed quantification of pit wall bench width and frequency to address stormwater management and slope stability.
- IR2-20:** Describe the Quality Assurance and Quality Control (QA/QC) system to be implemented during construction and all phases of development (e.g. grubbing,

earthworks, borrow material evaluation, drainage and water conveyance, foundation development).

IR2-21: Clarify all topsoil, overburden and granular material stockpile locations (including figures), including temporary stockpiles.

IR2-22: Provide additional details on the plant site and pad construction, including:

- a. source of fill material and whether it will be engineered (e.g. crushed rock, thaw-stable)
- b. applicable compaction standards
- c. explanation of Table 4-3, which shows fill volumes twice the cut volumes – identify the source of additional material
- d. cross sections of existing and final grades, and the underlying lithologies, down the length of the pad (WSW to ENE) and through the ponds

IR2-23: Provide additional details on the laboratory, including:

- a. roles and responsibilities for management and operation
- b. equipment and analytical capabilities (e.g. atomic absorption)
- c. standard methods to be applied
- d. on-site versus off-site analysis capabilities

IR2-24: Provide additional details on the camp site pad, including:

- a. source of fill material and whether it will be engineered (e.g. crushed rock, thaw-stable)
- b. applicable compaction standards
- c. explanation of Table 4-7, which shows fill volumes several times the cut volumes – identify the source of additional material
- d. cross sections of existing and final grades, and the underlying lithologies, down the length and width of the pad (WSW to ENE)

IR2-25: Confirm and describe monitoring and sampling frequencies for potable water source and treatment plant for detection of chemical agents used in mine processing (e.g. chemical and radiological profiles).

IR2-26: Provide additional details and site-specific information to demonstrate the feasibility and environmental performance of the proposed sewage treatment system and plant sludge management,. Specifically including:

- a. site-specific assessment of soil characteristics, drainage capacity, and hydrogeology for dispersion fields and composting locations
- b. sludge handling procedures, including estimated volumes generated, contingency plans, and measures to prevent wildlife attractant risks.

IR2-27: Provide additional details on the run-of-mine (ROM) stockpile and pad, including:

- a. source of fill material
- b. detailed map showing stockpile before and at full capacity, including location of runoff collection trenches and sediment ponds

- c. long-term monitoring (inspection or geotechnical instrumentation such as slope inclinometers)
- d. final ROM pad design (e.g. graded, compacted, lift thickness, and QA/QC) to support equipment traffic and prevent rutting
- e. cross sections (showing existing and final grades, and the underlying lithologies including the extent of the waste rock below the stockpile) down the length and width of the pad (WSW to ENE).

IR2-28: Provide additional details on the land treatment facility, including:

- a. basis for facility maximum capacity and contingency volumes expected (e.g. expansion, new location)
- b. destination for pumped water
- c. monitoring approach for water levels ensure proper management

IR2-29: Clarify how higher-risk water input periods (e.g. pre- and post-freshet) will be monitored to ensure water conveyance and collection perform as designed for each facility and the site. Include details on grading and perimeter drainage (e.g. culverts) to direct water away from infrastructure and slopes.

Additional editorial, content and formatting updates:

IR2-30: Incorporate updated maps and figures into the plan referenced in response to IR1 that clearly illustrate the general arrangement of the existing and proposed mine-site footprint, depicting all facilities, associated infrastructure, and potential area of disturbance.

IR2-31: Clarify all references to “waste rock” throughout the plan, specifying the classification of material (e.g., PAG vs non-PAG).

IR2-32: Include reference to the Waste Rock Overburden Plan in Section 4.1.2 as it relates to frozen soil storage area design for the footprint on, or adjacent to, Alpha WRSF.

IR2-33: Update Figure 4-1 to include elevation contours for improved understanding of local relief, runoff gradients, potential cut/fill areas, overall elevations/heights of ponds.

IR2-34: Include a figure with the location of all mine rescue emergency equipment on site.

3. Mine Operations Plan

The Mine Operations Plan must describe the proposed mining methods for the project, including required infrastructure and support equipment. It should also outline the physical monitoring program established to ensure the stability of all open pit and underground

workings at the mine site. Yukon Government requests that the Proponent undertake the following updates:

IR2-35: Update plan to include roles and responsibilities of key personnel for all primary activities addressed in the plan (e.g. processing, QA/QC, engineering, geotechnical).

IR2-36: Clarify how recommendations identified in Appendix B: “Feasibility Pit Slope Stability Update” have been incorporated into the design and captured within the plan, such as:

- a. removal of numerous noses from pit designs
- b. foliation-specific characterization and spatial distribution: mapping/modeling
- c. follow-up actions:
 - i. conduct field trials for controlled blasting techniques and performance/conformance inspections and reviews
 - ii. drill two additional geotechnical boreholes
 - iii. continue to maintain 3D Fault Model
 - iv. continue foliation-specific mapping, modeling, characterization and spatial distribution

IR2-37: Include the ground movement monitoring program that will be used to assess pit wall stability, including both instrumental monitoring and visual observations that will take place:

- a. list all instrumentation equipment and locations
- b. define monitoring frequency
- c. append Ground Control Management Plan (GCMP)

IR2-38: Provide the design criteria guiding open pit design, including:

- a. project constraints
- b. regulatory and guidance-based criteria
- c. detailed site-specific analyses
- d. summaries on how design was informed by lithology, alteration patterns, and large-scale fault structures (both regional and pit scale)
- e. other relevant criteria.

IR2-39: Explain why pit slope design and bench configurations do not incorporate assessments of rock mass conditions, including lithology, alteration (type and degree) and structural controls at both regional and pit scale.

IR2-40: Provide and detail settlement analysis completed for each facility.

IR2-41: Provide regulatory design parameters from the Seismic Design Report or explicitly reference their location with the appended report.

IR2-42: If segregation by grade is contemplated for operational optimization, describe how the current facility would accommodate segregation:

- a. is the existing ROM stockpile large enough to accommodate a segregation process
- b. maximum stockpile size within the existing footprint
- c. need for additional slope stability analyses
- d. consideration of geochemical source terms
- e. required management and monitoring protocols

IR2-43: Provide more information on water management related to in-pit dewatering, impacted by both surface and groundwater flows:

- a. quantify surface-water inputs to active mining areas (snowfall, rainfall, runoff channels, infiltration)
- b. detail how mine development will impact groundwater flow during operations
- c. confirm that long-term water management is addressed in the Reclamation and Closure Plan

IR2-44: Clarify which storage reservoir is being referenced for pit dewatering sediment control and provide design details:

- a. capacity for pit dewatering contributions
- b. consideration of climate change impacts
- c. design for precipitation and flood events

4. Emergency Response Plan

The Emergency Response Plan must outline the training, measures, and resources available to respond to all levels of emergencies that may occur at the mine site. Yukon Government requests that the Proponent undertake the following updates.

Although the Coffee Gold Project involves the use of the Northern Access Road (NAR) for transporting supplies and fuel, the construction and use of this access route are not part of the QML application. Nevertheless, emergency response to accidents or malfunctions along the NAR may depend on mine site personnel and resources. The Emergency Response Plan should therefore describe any response measures and support that the mine site will provide for incidents occurring on the access route.

IR2-45: Describe the response measures and support that the mine site will provide for incidents occurring on the NAR and explain how emergency resources will be managed on-site when personnel or equipment are deployed off-site.

IR2-46: Define “essential operations” and “critical areas” and describe:

- a. how these are identified during an emergency and incorporated into emergency response procedures
- b. what must remain operational during an emergency
- c. thresholds for shutting down areas/activities/operations

- d. roles and responsibilities for monitoring critical areas/activities/operations during an emergency
- IR2-47:** Clarify and describe the differences between emergency response levels.
- IR2-48:** Provide specifics on how the Emergency Response Team's scope of training and competency level will reduce pressure on external resources. Explain how emergency response procedures inform training requirements.
- IR2-49:** Include procedural flow charts for the incident follow-up, in addition to the initial response flow charts already provided.
- IR2-50:** Provide procedures and timelines for notifying external parties or agencies of an incident, including notifications to potentially affected parties regarding incidents with immediate or indirect safety impacts.
- IR2-51:** Include description and maps for all locations associated with explosives and flammable liquids/gasses. Ensure this information is accessible to all responsible personnel and incident command centres/systems.
- IR2-52:** Define or designate level of first aid certification required for the identified First Aid Attendant role.
- IR2-53:** Provide more details for emergency response procedures involving an on-call registered nurse (RN):
 - a. will the on-call RN ever be on-site?
 - b. will the on-call RN be available by phone, if so, when and through what venue (e.g. medical staff access only)?
 - c. which on-site medical staff will support both mine site and off-site (NAR) incidents?
 - i. is there redundant medical staff to ensure coverage both on- and off-site simultaneously?
 - ii. will operations be impacted if medical staff respond to an off-site incident?
- IR2-54:** Update the plan to reflect Yukon Mine Rescue Guidance and certification requirements, including:
 - a. certification and renewal requirements
 - b. record management for training and certification.
- IR2-55:** Describe emergency response procedures as they relate to the LNG power plant.
- IR2-56:** Provide details on the development of the return-to-work program, including associated SOPs and expected completion timeline.

Additional updates as they relate to the appendices of the Emergency Response Plan:

- IR2-57:** Provide consistent protocols and clearly defined responsibilities for medical evacuations across all procedures. Include a flow chart illustrating urgent and non-urgent ground and air medical evacuations.
- IR2-58:** Provide detailed information on response times for external medical resources and specify circumstances under which these resources may be unavailable.
- IR2-59:** Identify procedures applicable during seasonal freeze-up or break-up for medical incidents occurring outside daylight hours when air medevac is not feasible.
- IR2-60:** Provide evacuation procedures for all project areas, including trigger points (e.g. evacuation alerts or evacuation orders) for partial and full evacuations (inclusive of barge sites). Additionally specify:
- destination locations and transportation methods for evacuated staff
 - what redundancies need to be in place to ensure adequate coverage beyond what is available on-site
- IR2-61:** The plan currently lists Motor Vehicle Accidents (MVAs) as serious incidents, under the *Yukon Workers' Safety and Compensation Act*; however, MVAs are not classified as such under the Act. If the proponent intends to maintain MVAs as serious incidents, update Section 2.0 and Appendix A to accurately reflect requirements under the Act.
- IR2-62:** Update Appendix A: Heap Leach Facility Emergency Response Plan to include:
- definition of the acronym "PLS"
 - training and experience requirements for Emergency Response Team members or other qualified personnel responsible for cyanide containment and dilution response to a cyanide spill
 - describe how reporting requirements comply with Yukon Worker's Safety and Compensation Board standards.
- IR2-63:** Update Appendix C: Emergency Response External Contact List to include contact information for all external emergency contacts referenced in the Site Wide Emergency Response Plan.
- IR2-64:** Update Appendix D: Emergency Response Procedure - Fatality Investigation to include immediate reporting to the Worker's Safety Compensation Board, as required by the *Yukon Workers' Safety Compensation Act*.
- IR2-65:** Update Appendix D: Emergency Response Procedure - Fire to include:
- application for all project areas (currently reflects camp location only)
 - responsibilities for air quality and smoke hazards
- Note: Wildland Fire Management is not responsible for air quality concerns; these must be directed to the Health Emergency Duty Officer (Health.Emergency@yukon.ca or 867-332-4597)*

- c. clarify number of employees who may remain on-site to maintain critical operations, and specify which operations will continue or cease to limit environmental damage
- d. identify responsible positions for collecting:
 - i. fire hazard assessments
 - ii. hazardous material inventory, including locations and storage/containment details for all project areas
 - iii. plans for hazardous materials in the event of an evacuation or fire
- e. define procedures for fires initiated by employees or contractor activities

IR2-66: Update Appendix D: Emergency Response Procedure - Wildlife Encounters to include all project areas (currently reflects the exploration camp locations only)

IR2-67: Update Appendix D: Emergency Response Procedure - Spill to include notification of reportable spills to affected First Nations

Additional editorial, content and formatting updates:

IR2-68: Clarify roles and responsibilities throughout the plan and ensure consistent terminology (e.g. "Project Manager" is referenced several times but is not listed among key personnel roles in Section 1.5).

IR2-69: Correct reference to Figure 4-2 in Section 4.3 (currently mislabeled as Figure 4-1). Update title of Figure 4-2 to clearly indicate it represents the "General Code 1 Emergency Response Procedure".

IR2-70: Correct section references on page 12 regarding roles and responsibilities.

IR2-71: Update the Supervisor on Duty reporting structure to include reporting to the Emergency Response Team Lead or Incident Commander.

IR2-72: Revise Figure 6-2 to correct the assignment responsibility for issuing the "all clear" command. Section 4.4 identifies this responsibility as belonging to the Incident Commander.

5. Explosives Management Plan

The Explosives Management Plan must demonstrate compliance with all applicable Yukon legislation and regulations. Information is required to confirm that explosives management meets best practices for worker health and safety and that facilities comply with regulatory requirements. Yukon Government requests that the Proponent undertake the following updates:

IR2-73: Ensure all regulatory and legislative references are consistent throughout the plan, and that all applicable regulatory compliance requirements are fully identified and included. Some examples include:

- a. quantity and method of transportation for explosives (and detonators)
 - b. storage and inspection of packaged explosives (and detonators)
 - c. distance between cap and powder magazines
- IR2-74:** Include notification and reporting requirements to the Workplace Safety and Compensation Board in the event of a blasting incident.
- IR2-75:** Include and clarify blaster responsibilities and authorities (e.g., guarding blasts, examining the blasted area, authorizing resumption of work).
- IR2-76:** Identify key personnel responsible for logging pre-blast and post-blast information and clearly describe their roles and responsibilities.
- IR2-77:** Clarify how the on-site contractors will be trained and monitored to ensure compliance with the Explosives Management Plan and associated SOPs while working on-site.
- IR2-78:** Append safety data sheets for all explosive-related materials and describe where safety data sheets will be stored on-site for worker access.
- IR2-79:** Provide additional information on the number of blast mats required on-site prior to blasting to ensure sufficient quantities are always available to achieve planned blast radius tolerances and describe how this inventory will be managed during operations.
- IR2-80:** The plan references the development of a Bulk Explosives Emergency Plan and a Security Plan. Indicate when these plans will be completed and submitted to the regulator and outline their key components.
- IR2-81:** Clarify the meaning of “peak storage requirements” and explain how on-site storage facilities are designed to accommodate this volume while remaining compliant with applicable regulatory standards.
- IR2-82:** Describe the security requirements for loaded blast holes, whether primed or unprimed.
- IR2-83:** Provide details on how explosives in the blasting zone will be secured if operations are halted due to a lightning storm.
- IR2-84:** Include additional information on misfire procedures, including handling and disposal of explosives, investigative actions, determination of root causes, and steps to reduce recurrence.
- IR2-85:** Include the requirement for inspecting trucks used to transport explosive materials prior to use, and for documenting inspection reports.
- IR2-86:** Provide details on how explosives will be managed in the event of a wildfire.
- IR2-87:** Reference the Noise Management Plan and Socio-economic Management Plan, where appropriate, to reflect commitments in those plans as they relate to the use of explosives.

6. Waste Rock and Overburden Management Plan

The Waste Rock and Overburden Management Plan must provide detailed information on design, construction, and operation of all waste rock and overburden storage facilities. Yukon Government requests that the Proponent undertake the following updates.

Guidelines for Mine Waste Management Facilities & Design Criteria

In 2023, Yukon government released [Guidelines for mine waste management facilities](#) (MWMF) which establish minimum requirements for planning, development, operation, and closure of mine waste management facilities in Yukon. These guidelines were published prior to application submission but after the assessment phase was completed. As such, the regulatory review must adhere to all current Yukon government guidance, including MWMF guidelines.

IR2-88: Update the plan to reflect Yukon's MWMF guidelines and confirm these were considered during development and revisions of the plan and facility designs. Specifically:

- a. ensure the plan meets the 2023 guidance requirements and references the current MWMF guide for each mine waste management facility (not the 2017 draft)
- b. incorporate all components of the IR1 Response (November 2024) Appendix C gap analysis, including:
 - i. facility classification
 - ii. current level of design detail
 - iii. design criteria requirements based on facility/hazard classification (e.g., use or non-use of specific criteria, such as the analysis and decision associated with not including a liner for the Alpha WRSF)
 - iv. design criteria that have incorporated climate change considerations in planning and design, as outlined in the MWMF guide
 - v. compare and provide rationale for design details as required in the MWMF guide where gaps have been identified:
 1. guidelines are not met; and/or
 2. guidelines or criteria from other sources are being applied in place of Yukon's guidelines

Additional information required in a plan update:

IR2-89: Include roles and responsibilities of key personnel for all primary activities addressed in the plan (e.g., processing, QA/QC, engineering, geotechnical).

IR2-90: Provide source and methodology for determining waste rock in-situ density and swell/bulking factors used to calculate tonnage.

IR2-91: Clarify whether backfill into open pits (Latte, Supremo, Double Double and Kona) will consist of waste rock material generated from that same pit, other pits, or a combination.

IR2-92: Clarify mineral overburden characterization, including:

- a. analytical methodology for determining which overburden materials meet reclamation criteria
- b. how mineral and frozen mineral overburden quantities were determined in Table 2-4

IR2-93: Provide more information on permafrost characterization and distribution, including:

- a. mapping or determination of thaw-unstable materials in areas of potential development
- b. methodology for determining permafrost thickness (plan states 30-165 m; SRK (2018) thermistor lengths only 5-30 m)
- c. strategies and measures to protect thermal regime and prevent permafrost degradation during development
- d. climate warming scenario used in foundation analysis for Alpha WRSF
- e. soil type and ice composition in the footprint of the Alpha WRSF
- f. instrumentation to monitor facility impacts on native permafrost soil/rock

IR2-94: Provide information on humidity cells and kinetic testing.

IR2-95: Provide information regarding natural background and potential sources of uranium at the site.

IR2-96: Provide settlement or deformation analyses for all proposed facilities, as required by Yukon guidelines, including:

- a. analyses addressing settlement separately from stability (i.e., it does not appear as if the stability analyses considered whether settlement could occur)
- b. management of anticipated settlement and acceptable ranges/criteria, especially at the toe(s) in frozen, visible ice (Fv) areas
- c. discussion of creep rates in ice-rich areas
- d. confidence levels of consequence for each facility
- e. explain how frozen soil storage area design was considered in analysis
- f. analyses of more (critical) cross-sections of the Alpha WRSF (North to South appears to represent a more critical section, steeper slope based on Figure 2-5)
- g. if analyses have not been completed, provide rationale and describe how designs and management plans will ensure physically stable facilities during operation and closure

IR2-97: Confirm whether data sources within the last ten years (beyond Lorax (2016a)) have been incorporated into design criteria analysis (e.g. Table 2-11).

IR2-98: Provide additional information regarding the design of the Alpha WRSF, including:

- a. summary of potential risk and exposure pathways for arsenic during construction, operations, and closure, including the mitigation measures proposed to manage these risks
- b. confirmation whether the first 3-5m of waste rock placement during winter months will cover the entire footprint of the facility in the first winter
- c. how development sequencing will coordinate with winter waste rock placement to meet design considerations

IR2-99: Provide additional information for the Alpha WRSF rock drain design, including:

- a. confirmation whether end dumping will achieve D50 criteria or if segregation is planned prior to end dumping
- b. include the design report with recommendations and regulatory compliance for source material (quality and gradation), construction QA/QC, monitoring, and geotechnical conformance
- c. confirmation that design specifications are suitable for anticipated flow volumes
- d. methodology for determining localized areas of freezing in the rock drain (e.g. thermal modeling predictions, inference based on experience)
- e. basis for the conclusion that freshet flow will melt all winter ice formed
- f. risks and contingency measures if ice does not melt during freshet

IR2-100: Provide additional information for open pit backfill design, including:

- a. purpose, size and locations of additional rock drains for in-pit drainage
- b. risk mitigation measures for active mining near in-pit backfill slopes (beyond waste rock berms) to ensure personnel safety while working in these areas
- c. for ARD reduction in Kona pit:
 - i. thickness of cover to be placed over PAG material
 - ii. whether cover extends over entire Kona Pit
 - iii. operation management details of Kona pit waste in Alpha WSRF (e.g. designated area)
 - iv. measures to manage leaching from Kona Pit waste rock

IR2-101: Provide additional information on the proposed ex-pit waste rock storage facility, including but not limited to:

- a. operational constraints necessitating the need for temporary ex-pit storage
- b. proposed storage duration and the criteria to trigger relocation from the ex-pit
- c. proposed size (spatial footprint and volume) and location (including figures)
- d. design criteria as required in the MWMF guide
- e. drainage and erosion controls
- f. management and segregation controls for material placement and storage

IR2-102: Provide additional information for soil and overburden stockpiles, including:

- a. locations of all five temporary organic stockpiles (include figures)
- b. material classification methodology for storage management
- c. confirmation of estimated reclamation material volumes throughout the plan (e.g. Section 2.3.1 and Section 3.4)

- d. whether frozen overburden will be removed prior to foundation construction
- e. anticipated clay proportion in meltwater and potential turbidity impacts in Alpha Pond

IR2-103: Describe construction procedures for the frozen soil storage area to prevent weak layers prone to sliding (particularly type III or IV soils).

IR2-104: Explain waste management objectives for excluding zones of high arsenic leaching potential:

- a. will identification rely solely on block model or include real time analyses
- b. expected volume of this excluded material

IR2-105: Describe verification and construction practices to ensure management objectives for overburden are met.

IR2-106: Provide rationale for visual observation being the selected methodology for monitoring their geotechnical performance of the Alphas WRSF, overburden stockpiles, sedimentation pond dams and pit slopes. What other alternatives have been considered that would aid in monitoring for and preventing potential instability (e.g. seismic technology, survey methodologies).

Additional updates as they relate to the appendices of the Waste Roack and Overburden Management Plan:

IR2-107: Update Appendix A to include:

- a. Alphas WRSF:
 - i. whether ice-rich soils will be removed within proximity to Alpha WRSF toe
 - ii. refined soil stratigraphy model and sensitivity analysis or rationale for not including 3D slope stability modelling
 - iii. description of remaining studies, stability analysis, or planned geotechnical drilling to complete detailed design
 - iv. explain how “critical” cross-sections were selected - will additional analyses consider new/additional cross sections
- b. Temporary organic stockpiles
 - i. stability analysis for all temporary organic stockpiles (five identified in Section 3.4; only one described in Appendix A)
- c. ROM stockpile:
 - i. consideration of composite slip surfaces has been considered (e.g. slab/block failures) for the ROM Stockpile:
 - 1. is ROM Stockpile benched into the slope?
 - 2. has design capacity stability been analyzed?
 - 3. provide additional analysis results or rationale for omission

IR2-108: Update Appendix B to include comparison of recent thermal data to 2018 modelling and describe the level of additional characterization required to inform the detailed design.

Additional editorial, content and formatting updates:

IR2-109: Update Table 2-1, 2-2, 2-3 for rounding errors and consistency in totals presented

IR2-110: Clarify Table 2-5; how values were determined and explain missing data for Alpha WRSF and Heap Leach Facility

IR2-111: Label all columns in Table 2-8

IR2-112: Add soil type labels to Figure 2-7 and describe stratigraphy generation

IR2-113: Confirm whether Alpha WRSF design inter-bench slope angle changes have been reflected in Figures (e.g. Figures 2-5, 2-6, and 2-7 do not appear to show the change)

IR2-114: Confirm whether seepage from ROM Stockpile will be conveyed to water treatment plant

IR2-115: Confirm additional professional oversight (e.g. geotechnical) and monitoring in construction QA/QC program, beyond the qualified environmental professional/technician listed.