



February 25, 2026

Jasmin Dobson
Vice-President Environment and Permitting
Coffee Mine Project

By Email: jdobson@fuertemetals.com

Re: Coffee Gold Quartz Mining License Application, Information Request 4 - Detailed Review: Phase 2

Dear Ms. Dobson,

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 Nation to review the application. During the review of Phase 2 application materials, 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 4 (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.

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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
Tanya Harrison, Selkirk First Nation

Enclosed: Information Request 4 - Detailed Review: Phase 2

Information Request 4 - Detailed Review: Phase 2

The Mineral Resources Branch (MRB) has completed a detailed review of the Phase 2 materials submitted as part of Fuerte Metals' Quartz Mining License application (the "application") for the Coffee Gold Mine. This information requests pertains to the following Phase 2 plans:

- Air Quality and Greenhouse Gas Management Plan
- Environmental Monitoring and Adaptive Management Plan
- Noise Management Plan
- Site Characterization Plan
- Vegetation Protection Plan
- Water Management Plan

Timely submission of all requested information is essential to avoid delays in the regulatory review process. Updated plans must include a concordance table demonstrating how Decision Document terms and conditions and proponent commitments have been met and indicate how and where information requirements have been addressed.

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. 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 or did not provide the referenced material at all (e.g., Health and Safety Program and grievance mechanism which provide information to fulfill compliance with Decision Document term and condition #41 and section 110 I #4).

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.

IR4-1: Revise and submit updated concordance tables for all Phase 2 plans to reflect current plan structure, for both decision document and proponent commitment concordance.

1.2. 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 2 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.

- IR4-2:** 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.
- IR4-3:** 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, and
 - d. corporate-level accountability or decision-making processes.
- IR4-4:** 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 clearly identify:
 - a. the source and version of any standard applied,
 - b. the key requirements or performance criteria relevant to the plan,
 - c. how the standard will be implemented, monitored, and audited at the site level, and
 - d. any associated training, documentation, or reporting processes.
- IR4-5:** Identify and justify any changes to commitments or management approaches that result 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.

1.3. Provision of Referenced Material, Reduction of Plan Redundancy

Throughout the plans references have been made to supporting materials. 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.

IR4-6: Provide all project-specific materials referenced in submitted plans and appendices or clearly indicate where these materials can be found.

IR4-7: 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.

1.4. Standard Operating Procedures

SOPs are essential components of management and monitoring 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.

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.

IR4-8: Provide all Standard Operating Procedures that are referenced in the plans. If an SOP is not available provide a summary of the monitoring activities (e.g., frequency of data collection, locations, frequency of data analysis, etc.).

IR4-9: Provide a list of all SOPs intended to be developed and summarize the actions that would be included in that SOP.

IR4-10: Describe the process that will be followed to update SOPs, when and how they are reviewed or updated, and how/when parties will be incorporated into reviews of the updated SOPs.

2. Air Quality and Greenhouse Gas Management Plan and Air Quality and Greenhouse Gas Monitoring Plan (Environmental Monitoring and Adaptive Management Plan, Appendix I)

Yukon government requests that the Proponent update the Air Quality and Greenhouse Gas Management Plan and Air Quality and Greenhouse Gas Monitoring Plan to ensure alignment with the Decision Document terms and conditions. The following information requests outline required revisions and clarifications:

IR4-11: Revise Table 5-1 to include the missing mitigation text for Level 2 and Level 3 action responses to comply with Decision Document Term and Condition #40. Include, at a minimum:

- a. Level 2: “Employ additional mitigations or operational modifications **and halt**, until levels have subsided below thresholds, those activities contributing to increased levels”, and
- b. Level 3: “Employ additional mitigations or operational modifications **and halt, for a minimum of 4 hours**, those activities contributing to increased levels”.

IR4-12: Provide the Health and Safety Program, as listed in the proponent’s decision document concordance table, including the indoor air quality monitoring approach which demonstrates how the Proponent will ensure that impacts on employee health (both on and off duty) are monitored and mitigated as required under Decision Document Term and Condition #41.

- a. Include details on all relevant air quality and gas monitoring requirements within working areas (e.g., power/LNG facility, process plant and any other enclosed or semi-enclosed spaces where workers may be exposed).

IR4-13: Provide the complete grievance mechanism referenced by the Proponent for air quality-related complaints to comply with Decision Document Term and Condition S110 I (#4). The mechanism must include:

- a. roles and responsibilities,
- b. public access pathways,
- c. response and resolution procedures, and
- d. approach for collaboration with Environmental Health Services Branch, Government of Yukon.

IR4-14: Revise the monitoring program to include five long-term monitoring stations and confirm the use of continuous monitoring, as required by Decision Document S110 I (#1).

IR4-15: Revise the monitoring program to incorporate MicroPulse LiDAR technology or provide a detailed justification and description of equivalent technology consistent with Decision Document S110 I (#2).

IR4-16: Describe the system or process that will be used to implement additional monitoring and/or mitigation measures in the event of changes to overall air quality, particularly increases in particulates, dust and contaminant concentrations approaching thresholds to comply with Decision Document Term and Condition S110 I (#4).

IR4-17: Provide additional detail on analysis and actions undertaken in the event that YAAQS thresholds are being approached at any monitoring stations, or where CACs have exceeded thresholds in order to comply with Decision Document Term and Condition #39, including:

- a. how activity reductions will be implemented to reduce emissions at the source,
- b. how and by whom notifications will be provided to workers (both on and off duty), and
- c. identification of appropriate PPE, communication of PPE requirements, and enforcement approach.

IR4-18: Investigate (in collaboration with Yukon Health and Social Services) current air quality monitoring programs operating within the Yukon that issue air quality alerts, contribute to air quality modeling, or support public communication efforts. Identify any opportunities for project participation in such programs and/or ways the Project can benefit from information generated by these programs. For example, installation of real-time PurpleAir Sensors for supplemental data collection.

With climate change, wildfires and wildfire smoke are becoming increasingly frequent and severe. Even moderate levels of fine particulate matter can negatively affect human health, particularly among vulnerable populations. There are a large number of outdoor workers who, over the life of the project, will likely be exposed to wildfire smoke, which can negatively impact their health. To protect worker health and well-being, camp infrastructure should include designated spaces with cleaner air, providing safe areas of reprieve during wildfire smoke events.

IR4-19: Include wildfire smoke response measures for both outdoor and indoor workers.

Additional editorial, content and formatting updates:

IR4-20: Revise Table 2-1 to reference the 2025 Yukon Ambient Air Quality Standards (YAAQS) as the current applicable standards. Describe how 2030 Canadian Ambient Air Quality Standards (CAAQS) will be integrated into the management plan over time.

IR4-21: Provide Section 4.3 – Data Analysis, which is referenced in Section 1.0 but not included in the submitted Plan.

3. Noise Management Plan and Noise Monitoring Plan (Environmental Monitoring and Adaptive Management Plan, Appendix J)

Yukon government notes that the Noise Management Plan presents current mitigation measures only at a conceptual level, and it is unclear how these measures will be advanced or finalized prior to construction. The Proponent is requested to update the Noise Management Plan and Noise Monitoring Plan to ensure alignment with applicable Decision Document terms and conditions. The following Information Requests outline required revisions and clarifications:

IR4-22: Provide a clear timeline and milestone(s) for advancing conceptual mitigations to design-level mitigations and describe how these will be incorporated into the plan prior to construction.

IR4-23: Revise Section 2.1 to confirm that the Noise Management and Monitoring Plans are required to be submitted for review and approval under the Quartz Mining License.

IR4-24: Provide the schedule for completing a “design level assessment” (as defined in the plan) with a qualified caribou behavior specialist, in consultation with Yukon government, as required by Decision Document term and condition #5, Include:

- a. how the assessment will inform design-level mitigations to reduce noise, visual, and light stimuli in alpine/subalpine habitats,
- b. deliverables and anticipated timelines, and
- c. integration of the resulting mitigations into both the noise and wildlife management plans, prior to construction.

IR4-25: Clarify how the recommendations from Appendix 10-A Noise Intermediate Component Analysis Report 2017, s.43.3 (YOR 2017-0211-091-1) have been incorporated into the noise management and monitoring plans, as required by Decision Document term and condition #38.

IR4-26: Provide additional clarity on the proposed Project Complaints Database and Noise Complaint Procedure, including:

- a. how the proponent will develop and implement a system for tracking, recording, and responding to noise-related complaints in collaboration with Environmental Health Services Branch, Government of Yukon,
- b. development, implementation, and operational timelines,
- c. proposed reporting frequency to Environmental Health Services Branch (e.g., quarterly, annually), and

d. when the complaint procedure be made publicly accessible.

IR4-27: Clarify the timeline and process for establishing and implementing a communication mechanism for informing individuals and communities who may be affected by project-related noise before construction or changes to sound levels occur.

IR4-28: Describe how the Noise Management and Monitoring plans complies with the requirements of Decision Document term and condition #38. If proposing deviation, provide a detailed justification and a description of equivalent or greater alternatives that will be implemented.

Additional editorial, content and formatting updates:

IR4-29: Where external references (e.g., BC OGC noise guidelines) are cited, confirm their compatibility with Yukon requirements and commit to applying the more stringent standard where differences exist.

IR4-30: Correct the reference errors noted in Sections 1.3, 2.0, and 2.3.

IR4-31: Increase explicit cross-references to the Noise Monitoring Plan within the Noise Management Plan to clearly link between management strategies and their monitoring frameworks:

- a. mitigation measures,
- b. monitoring methodologies,
- c. thresholds,
- d. monitoring locations, and
- e. reporting requirements.

IR4-32: Ensure that responses to Information Request #3 (IR3-20 and IR3-21) are reflected or appropriately cross-referenced in both the Wildlife Monitoring Plan and the Noise Monitoring Plan, where relevant.

4. Vegetation Protection Plan and Vegetation Monitoring Plan (Environmental Monitoring and Adaptive Management Plan, Appendix H)

While there is no specific plan guidance for vegetation protection plans provided in quartz mining license applications, this plan must still meet requirements of the Yukon Revegetation Manual and clearly demonstrate concordance with proponent commitments and end-land-use objectives. Yukon government requests that the Proponent update the Vegetation Management Plan and Vegetation Monitoring Plan with the following information requests for revisions and clarifications:

- IR4-33:** Provide a description of how the company will protect vegetation resources. This should include specific preventative and mitigative measures related to:
- controlling and preventing the spread of invasive species,
 - reduction of soil exposure,
 - managing and mitigating impacts of dust deposition, and
 - addressing additional vegetation stressors relevant to the site.
- Alternatively, provide clear and direct references to where this information is contained within existing materials.
- IR4-34:** Include a map, or update existing figures, to show the extent of wetland habitat located within the mine site footprint and the buffer zone(s) proposed to be put in place to protect it.
- IR4-35:** Clarify where and how equipment inspections will occur before accessing the NAR and mine site. Specify where washing or cleaning will be performed if contamination (soil/plant parts/seed) is detected. Include:
- locations of inspection stations and wash/cleaning bays,
 - containment and disposal methods for wash water/debris, and
 - recordkeeping procedures and pass/fail criteria for inspections.

Survey efforts for Yukon Species of Conservation Concern are ongoing. Although baseline studies have been previously conducted within the project area, new occurrences or populations of rare plant species may be identified within or near the project boundaries that were not captured in previous survey efforts.

Current mapped occurrences are available via GeoYukon: [GeoYukon](#), and data can be downloaded from: [CDC Species of Conservation Concern - Data - Open government portal - Government of Yukon](#). Yukon Conservation Data Centre updates these datasets quarterly with newly identified occurrences.

- IR4-36:** Include the practice of consulting YCDC Species of Conservation Concern prior to pre-clearing surveys for rare plant species to ensure survey efforts reflect the most current information regarding known and potential species within the survey area.
- IR4-37:** Describe the mitigation practices that will be applied if a plant of conservation concern is identified and requires protection.

Additional editorial, content and formatting updates:

- IR4-38:** It is unclear that the Vegetation Monitoring Plan is an appendix of the Environmental Monitoring and Adaptive Management Plan. Increase explicit

cross-references to the Vegetation Monitoring Plan within the Vegetation Management Plan.

IR4-39: Correct reference errors within the Table of Contents (Section 4.2.1), Section 1.4, and Section 3.3.

IR4-40: Correct titling issues where Appendix A and Appendix B are labelled incorrectly as “Appendix AA” and “Appendix BB.”

5. Water Management Plan and associated monitoring plans: Surface Water Quality Monitoring Plan, Groundwater Monitoring Plan, and Hydrology Monitoring Plan (Environmental Monitoring and Adaptive Management Plan, Appendix A, B and C)

The Water Management Plan 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. Yukon government requests that the Proponent undertake the following plan updates:

IR4-41: Incorporate the information provided in responses to IR1-53, IR1-54, and IR1-55 (Newmont IR1 Response, November 2024). Update all affected sections, tables, and figures to ensure consistency with those responses and any other applicable information.

IR4-42: Standardize terminology used for water quality targets and standards. For example:

- a. clarify whether references in Table 3-9 for “water treatment values” and “water treatment targets” are equivalent with Table 4-12 reference to “allowable concentrations in WTP effluent”,
- b. clarify whether “Alpha Pond EQS” and “Halfway Creek EQS” are equivalent, and
- c. confirm whether heap leach processing solution is expected to exceed “site-specific water quality objectives” is the correct reference for water quality objectives.

IR4-43: Revise the climate change rationale to demonstrate how non-stationarity in precipitation and snowpack is incorporated into design storm return periods, water balance modelling, and flood storage. Provide quantitative evidence from regional climate models or hydrological projections. Yukon government does not support the assumption that conditions will remain unchanged over the mine life.

IR4-44: Describe what alternatives have been considered for transferring non-contact rainwater pond to the Alpha WRSF rock drain. Provide more information regarding the classification of the Rainwater Pond as “non-contact,” given that

planned uses (makeup water for the heap, transfer to Alpha WRSF rock drain) would convert it to contact water. Provide:

- a. criteria under which water may be transferred,
- b. triggers for when direct discharge should occur (if ever), and
- c. mitigation to avoid inappropriate dilution of contact water in violation of MDMER prohibitions.

IR4-45: Clarify whether the Facility Pond meets the Canadian Dam Association (CDA) definition of a dam and whether any design criteria must conform to CDA Dam Safety Guidelines. Provide justification for classification decisions.

IR4-46: Define acceptable performance criteria for the Alpha Pond in terms of water quantity and quality for seepage from the Pond or provide the appropriate cross-reference for where this information can be found to demonstrate compliance with Decision Document term and condition #17.

IR4-47: Yukon government does not support transfer between ponds as a mitigative measure. Demonstrate how each pond has been designed to function independently for its intended purpose without reliance on transfers. Additionally:

- a. describe any adaptive management thresholds in place for water management,
- b. clarify how the reserved portion of EP-2 designated for gold bearing solution (Section 4.3.12) has been accounted for in consideration of the available storage relevant to the ESR, and
- c. provide the estimated hydraulic travel time through the Alpha WRSF rock drain from upstream entry to downstream exit, including any assumptions used in the calculation.

IR4-48: Provide the most current water treatment system design, including process flow diagrams, treatment stages, influent/effluent assumptions, storage, and operational parameters. Include:

- a. engineering updates completed since the last revision,
- b. an explanation of how the water treatment system will be designed, operated, and commissioned to treat water throughout all phases – including management of byproducts (e.g., nitrogen species) associated with HLF rinsing, etc., and
- c. confirm compliance with Recommendation #54 in Yukon government's December 5, 2025 "*Implementation of the Independent Review Board Recommendations*" letter to Fuerte Metals.

IR4-49: Describe how drainage previously captured by the Halfway Creek Diversion will be managed or monitored once the diversion has been reclaimed, provide clear cross-reference to where this information can be found in the application. The

response to IR1-55 (Newmont IR1 Response, November 2024) lacked sufficient detail.

IR4-50: Confirm whether all facilities requiring fire suppression systems -including ADR plant, LNG/power facility, camp - are accounted for in water demand estimates, storage volumes, and distribution system design.

IR4-51: Clarify the proposed timing for completion of annual water management planning. Confirm that results, including updated water balance models, will be finalized in advance of freshet each year to inform operational planning.

IR4-52: Update Appendix A: Provide the estimated 30-day inflow volume to the Alpha Pond. Develop a contingency plan that includes:

- a. measures for treating water if flocculants and settling time are not sufficient to achieve discharge criteria,
- b. a site-specific flocculant management plan considering variable inflows and turbidity/TSS ranges,
- c. defined response times for implementing contingency measures, and
- d. provide contingency measures that are not included in routine implementation of the water management plan for all project phases.

Heritage Resources have not been characterized in the Water Management Plan, despite project activities during all phases of the project intersect or are in close proximity to managed heritage sites. Some illustrations within the plan depict contact (contaminated) water discharging across and through heritage sites.

IR4-53: Clarify whether heap leach pad effluent will pass over, through, or adjacent to the heritage site located near the heap leach pad. Provide a clear description of the effluent pathway from the heap leach pad to the effluent ponds and processing facility.

IR4-54: Update all relevant maps to clearly display heap leach pad boundaries, effluent channels, “no-work zones” and adjacent heritage sites or other sensitive areas. Identify and reference all special management plans that inform and govern the no-work zones.

Additional updates as they relate to the associated appendices of the Environmental Monitoring and Adaptive Management Plan:

IR4-55: Update Appendix A: Hydrology Monitoring Plan to include an implementation schedule describing hydrology monitoring requirements during each project phase (baseline, construction, commissioning, operations).

- IR4-56:** Update Appendix B: Surface Water Quality Monitoring Plan to include sampling requirements for all contact water collected within containment or collections systems at the power/LNG facility.
- IR4-57:** Update Appendix B: Surface Water Quality Monitoring Plan to clarify contact water monitoring, sampling locations and minimum frequencies, specifically:
- Water Treatment Plant (WTP) monitored daily during discharge events to allow for timely detection of water quality issues and effective treatment adjustments,
 - Alpha Pond monitored daily during discharge events to ensure quick detection of any water quality deviations that may require immediate action,
 - Events Pond monitored weekly to ensure adequate oversight of stored contact water quality,
 - include monitoring stations that will be installed for seepage from the ROM stockpile and at the Alpha Rock Drain to ensure comprehensive monitoring of all potential water quality impacts from the facility, and
 - a clear sampling schedule for both discharging and non-discharging months to ensure consistent monitoring throughout the year, accounting for seasonal changes in water quality.
- IR4-58:** Update Appendix B: Surface Water Quality Monitoring Plan to clarify contact water monitoring, sampling parameters and analysis, specifically:
- weekly monitoring for total cyanide and dissolved metals,
 - daily monitoring for free cyanide, weak acid dissociable cyanide, sulphate, ammonia, nitrate, nitrite, turbidity, and total suspended solids,
 - continuous or hourly monitoring for pH, oxidation-reduction potential, electrical conductivity, and temperature,
 - expanded cyanide suite including free cyanide, total cyanide, thiocyanate, and cyanate to provide a more comprehensive assessment of cyanide presence and treatment effectiveness, and
 - a description of on-site real-time monitoring and how results will support immediate operational adjustments to maintain compliance.
- IR4-59:** Update Appendix C: Groundwater Monitoring Plan, Yukon government does **not** support the proposed reduction in sampling frequency (Table 2-7) to once every three years for downgradient monitoring wells near the land treatment facility and landfill. These locations require continued annual sampling given long-standing concerns, including reliance on permafrost as a containment mechanism, variable facility demands, and changes in waste volumes over the mine life. The Proponent must provide a clear technical justification for reducing monitoring frequency and demonstrate why annual sampling is not required to ensure timely detection of groundwater quality changes.

- IR4-60:** Update Appendix C: Groundwater Monitoring Plan to provide additional rationale demonstrating that the groundwater monitoring network is sufficiently dense and appropriately located to detect potential effects downgradient of all major facilities, including the Alpha WRSF, Alpha Pond, Heap Leach Facility, and pit network.
- IR4-61:** Update Appendix C: Groundwater Monitoring Plan to describe plans to drill, install, and begin monitoring of any new wells early enough to avoid breaks in baseline or operational groundwater datasets should existing wells be decommissioned during construction or operations.

6. Environmental Monitoring and Adaptive Management Plan

The EMAMP submitted to date includes AMPs for surface water quality and aquatic life only. No adaptive management approach was provided for groundwater or for other environmental monitoring components where unanticipated outcomes or ineffective mitigation measures may arise. The Proponent must demonstrate a clear understanding of the adaptive actions available, the conditions under which they would be triggered, and the mechanisms for implementing corrective measures across all environmental domains..... Yukon government requests that the Proponent undertake the following plan updates:

- IR4-62:** Incorporate the information provided in response to IR1-27 (Newmont IR1 Response (November 2024)).
- IR4-63:** Incorporate the information provided in responses Appendix H gap analysis (Newmont IR1 Response, November 2024). This integration must provide clear rationale; address identified gaps and clarify how updates have been reflected across EMAMP sections and appendices.
- IR4-64:** Include a progressive reclamation effectiveness program, consistent with Yukon's Plan Requirement Guidance, that will monitor the progressive reclamation measures that are committed to in the Reclamation and Closure Plan.
- IR4-65:** Clarify the monitoring objectives for dust fallout and mineral content. The update should explain whether the Proponent will incorporate sampling of soils and vegetation to assess metal deposition and uptake, consistent with practices adopted in other jurisdictions to evaluate potential vegetation and food-chain effects.
- IR4-66:** Revise Table 11-2 to ensure all relevant parameters are aligned with the 2025 Yukon Ambient Air Quality Standards (YAAQS) and conform with Table 2-1 in the Air Quality and Greenhouse Gas Management Plan (see IR4-20). For

example, PM₁₀ should reference the applicable Yukon standard rather than British Columbia Air Quality Objectives.

- IR4-67:** Increase explicit cross-references between the Environmental Monitoring and Adaptive Management Plan and related management and monitoring plans. Cross-references must clearly identify how management strategies correspond to monitoring methods, thresholds, locations, reporting requirements, and Adaptive Management Initiatives (AMIs).

Additional updates as they relate to the appendices of the Environmental Monitoring and Adaptive Management Plan:

- IR4-68:** Provide an AMP for groundwater. This plan must be developed in accordance with the AMP Guide. Yukon government disagrees with the response provided in Newmont IR1 Response (November 2024) for IR1-25 and requires the submission of an AMP for groundwater.
- IR4-69:** Update Appendix D: Meteorological Monitoring Plan to incorporate the information provided in responses to IR1-28 (Newmont IR1 Response (November 2024)).
- IR4-70:** Update Appendix E: Geochemical Monitoring Plan to describe the methodology for determining when discrepancies between predicted and observed metal leaching/acid rock drainage (ML/ARD) behavior warrant additional analyses or updates/modifications to mine waste management strategies.
- IR4-71:** Update Appendix E: Geochemical Monitoring Plan to incorporate implementation, monitoring, mitigation, and management of any potential ML/ARD material.
- IR4-72:** Update Appendix F: Fish and Aquatic Life Monitoring Plan to describe the ability to detect change, adjust the program if needed, and model population changes beyond presence/absence. Additionally, to include:
- a power analysis demonstrating the ability to detect change in CPUE for Arctic grayling, Chinook salmon and slimy sculpin at 80% power for a 20% change,
 - standardized CPUE sampling at 200m habitat reaches, at 1200s, to provide comparative analysis to other systems,
 - a multi-year open system mark recapture program to discern changes in population abundance, focused on Arctic grayling,
 - identification of monitoring metrics, thresholds, triggers and actions in the adaptive management plan for fish and fish habitat, and
 - use of Bayesian modelling to estimate abundance, incorporating co-variates such as water flow, temperature, conductivity, and sampling gear.

- IR4-73:** Update Appendix K: Physical Monitoring Plan to include the power/LNG facility on the general arrangement figure and describe required monitoring and inspections for all associated infrastructure.
- IR4-74:** Update Appendix L: Surface Water Quality and Aquatic Life Adaptive Monitoring Plan to explain why only six water quality objective parameters of the larger suite were selected for AMI for surface water quality and identify conditions under which additional parameters may be incorporated.
- IR4-75:** Update Appendix L: Surface Water Quality and Aquatic Life Adaptive Monitoring Plan to include action plans describing required responses, timelines, and reporting obligations in the event of a Tier 3 and 4 exceedances.
- IR4-76:** Update Appendix L: Surface Water Quality and Aquatic Life Adaptive Monitoring Plan to clarify how the AMI defines and applies a significance threshold, consistent with the [Guidelines for developing adaptive management plans in Yukon: Water-related components of quartz mining projects | Yukon.ca](#)).
- IR4-77:** Update Appendix L: Surface Water Quality and Aquatic Life Adaptive Monitoring Plan to provide rationale for the selected trigger development approach—based on model predictions and water quality objectives—and discuss why alternatives (e.g., seasonally based triggers or non-degradation triggers) were not selected.
- IR4-78:** Update Appendix L: Surface Water Quality and Aquatic Life Adaptive Monitoring Plan to resolve inconsistencies between uranium performance thresholds/triggers presented in Tables 4-4 and 4-6, ensuring a consistent and transparent approach.
- IR4-79:** Update Appendix L: Surface Water Quality and Aquatic Life Adaptive Monitoring Plan to identify how the Environmental Monitoring and Adaptive Management Plan complies with Decision Document term and conditions - Section 110 E and F (#8). Provide clear cross-references to any other applicable plans where these requirements are met.

7. Site Characterization Plan

The Site Characterization Plan (SCP) is a foundational component of the Quartz Mining License application. It establishes the environmental, geotechnical, permafrost, hydrologic, and geochemical conditions that inform the design, construction, operation, and closure of the Project. It is essential to support design assumptions, evaluate long-term performance risks, and demonstrate that the Project can be developed in accordance with Yukon regulatory requirements. Yukon government requests that the Proponent undertake the following plan updates:

- IR4-80:** Incorporate the information provided in responses to IR1-19, IR1-21 and IR1-22 (Newmont IR1 Response (November 2024)). Update all affected sections, tables, and figures to ensure consistency with those responses.
- IR4-81:** Confirm that all supporting geotechnical data for proposed site infrastructure has been included in the Site Characterization Plan. Identify any outstanding data gaps and provide a plan and timeline for acquiring remaining information.
- IR4-82:** Provide groundwater model information sufficient to describe site–groundwater interactions, including potential flow paths, travel times for contaminants, and predicted hydraulic responses to operations. Update Table 1-1 with accurate references to the groundwater modelling documentation and its location in the Site Characterization Plan.
- IR4-83:** Provide baseline information that was included in the November 2023 Site Characterization Plan but omitted from the July 2025 version, or reference where in the application it can be found, including:
- a. subsections on: Atmospheric Pressure, Solar Radiation, Snow Depth, Local Streamflow Measurements,
 - b. removal of certain snow courses from Table 3-1, and
 - c. removal of baseline description in Section 4.3.
- IR4-84:** Explain why surface water monitoring stations are located 1–2 km from proposed operations. Provide the rationale for monitoring at these distances and describe whether additional proximal stations are required to adequately characterize potential site-related effects.
- IR4-85:** Update Table 4-1 to include temporal information (start dates, frequency, and duration) for each surface water monitoring station. Indicate which stations remain active and which will transition into the operational monitoring program.
- IR4-86:** Explain why column and kinetic testing did not include a granite only barrel or other variations.
- IR4-87:** Clarify how stability analyses for the Alpha WRSF accounted for unstable rock conditions described in Appendix A within the proposed footprint.
- IR4-88:** Clarify why the schist waste rock/pad volume does not vary over time in Figure 11-2.
- IR4-89:** Revise Section 9 so that references to Appendix A are made explicitly in each relevant subsection, not only in the introductory statement, to avoid confusion when subsections are read independently.

Additional updates as they relate to the appendices of the Site Characterization Plan:

- IR4-90:** Clarify the statement made in the IR1 Response (November 24) to IR1-23 regarding siting infrastructure in unfrozen (UF), ice-poor (Fn), or ice-rich (Fv) terrain. Specifically:
- explain the criteria used to determine when detailed design or construction-phase refinements are required in ice-rich areas, and
 - identify what additional investigations, modelling, or engineering work remain outstanding to complete final design for infrastructure interacting with permafrost.
- IR4-91:** Provide a clear description of how the effects of ice-rich permafrost terrain on the long-term stability of the heap leach facility, haul roads, Alpha Waste Rock Storage Facility, and Alpha Pond have been evaluated. This discussion must address how ice content, thaw consolidation, ground thermal regime, and potential subsidence have been incorporated into design assumptions, consistent with closure requirements for long-term stability.
- IR4-92:** Update Appendix A: Provide detailed settlement analysis completed for each facility.
- IR4-93:** Update Appendix B: Clarify whether the climate and hydrometeorological datasets will be updated as part of final design development for water management structures.
- IR4-94:** Update Appendix C: Include all stations identified as part of the proposed receiving environment monitoring network for construction and operations (e.g., LC-11-6, YT24-2.2, HC-0.1, YUK 48.8, YUK 37.1) or provide rationale for their exclusion from the baseline report.
- IR4-95:** Update Appendix J: Include the contribution of carbon washing and elution reagents used in the ADR plant in source term development. Provide base-case consumption assumptions for predictive modelling.
- IR4-96:** Update Appendix J: Provide the basis for the assumption that only 70% of sodium added as NaCN dissolves into the heap solution.
- IR4-97:** Update Appendix J: Provide detailed information on expected SCN concentrations in heap leach solution and discuss how SCN presence may influence TDS predictions and water treatment system design.
- IR4-98:** Update Appendix J: Clarify whether hydrous ferric oxide (HFO) content has been determined for any geological material at the site. Include:
- a description of how HFO content was estimated or measured (including methods, assumptions, and representativeness), and
 - an explanation of how long-term stability of HFO and the availability of sorption sites have been evaluated.

- IR4-99:** Update Appendix J: Clarify how regional background concentrations of arsenic and uranium in surface water are being used to develop geochemical source terms and how these inputs are integrated into the water quality model.
- IR4-100:** Update Appendix J: Clarify how the modelled uranium attenuation mechanisms are expected to persist over time, including:
- a. real-world, long-term instances/observations of these mechanisms occurring at mine/field sites,
 - b. site specific comparison,
 - c. clarification on whether sorption sites become occupied, and
 - d. potential changes in water chemistry that could impact short- or long-term effectiveness of attenuation mechanisms.
- IR4-101:** Update Appendix J: Provide a more comprehensive discussion of solubility controls and scaling factors used in the water quality model, including how these are derived, applied, and validated in the geochemical source term framework.
- IR4-102:** Update Appendix J: Provide expanded analysis describing the long-term solubility behavior of each constituent of concern, including how these behaviours are represented in the water quality model.
- IR4-103:** Update Appendix J: Clarify why the Mt. Nansen field barrels were used to develop scaling factors rather than Coffee Gold specific field barrels and provide justification for their applicability.
- IR4-104:** Update Appendix J: Clarify how saturated column testing results were used to inform source terms and closure predictions.
- IR4-105:** Update Appendix J: Describe how ore source terms were developed; confirm whether they are equivalent to Heap Leach Facility solution characterization; and state whether humidity cell or saturated column testing was conducted on ore.
- IR4-106:** Update Appendix J: Identify which tests listed in Table 3-2 remain active and describe how ongoing and future results will be used to refine source term development.
- IR4-107:** Update Appendix J: Explain the relationship between the three-stage WesTech treatment process and the six-stage system in the Reclamation and Closure Plan. Identify remaining information needs and testwork required to advance the treatment system design from conceptual to defensible engineering level.