May 4, 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 7 - Detailed Review: Phase 3

Dear Ms. Dobson,

On May 21, 2025, Major Mines and Technical Services Branch (MMTS) sent Newmont Corporation a letter confirming that the Coffee Gold Quartz Mining License application (the "application") had been deemed complete 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. MMTS 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 3 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 7 (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.

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,

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 7 - Detailed Review: Phase 3

Information Request 7 - Detailed Review: Phase 3

The Major Mines and Technical Services Branch (MMTS) has completed a detailed review of the Phase 3 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 3 plans:

- Erosion and Sediment Control Plan
- Spill Contingency Plan
- Waste and Hazard Materials 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. 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 3 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.

IR7-1: 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.

IR7-2: 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, and
d. corporate-level accountability or decision-making processes.

IR7-3: 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 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.

IR7-4: 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.

1.2. Standard Operating Procedures

SOPs are essential components of management and monitoring plans associated with engineered facilities and critical controls (e.g. SOPs within OMS manuals), but there are also instances in which SOPs are not required for licensing and, if submitted, will only be reviewed for information purposes. This approach allows SOPs that do not form a part of the license to be amended as needed without triggering formal plan amendments unless substantive changes to monitoring programs or mitigation measures, as laid out in plans, are proposed.

In order to evaluate the feasibility, adequacy, and reliability of mitigation measures in the current regulatory review, management and monitoring plans must clearly capture the primary commitments that underpin SOPs, including:

- Applied methodologies,
- Monitoring objectives, and
- Decision points that trigger adaptive management responses.

Monitoring Plans must clearly articulate:

- The objective of each monitoring component (i.e., what effect is being measured or managed),
- What data are being collected, at what frequency, and at what spatial scale;
- When and how data will be analyzed, and
- How analysis results inform adaptive management decisions.

For Phase 3 plans, SOPs themselves are not required for plan approval, provided that the plans include sufficient SOP-equivalent detail.

IR7-5: Provide a list of all SOPs intended to be developed and provide SOP-equivalent detail, as described in section 1.2 of the IR, within the body of the plans.

IR7-6: 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.

1.3. Safety Data Sheets

Upon further consideration, Yukon Government has determined that while the *2013 Plan Requirement Guidance for Quartz Mining Projects* included recommendations for the submission of Data Safety Sheets as appendices to certain Quartz Mining License plans, MMTS no longer requires the submission of Safety Data Sheets (SDSs) as part of application packages.

For Phase 3 plans, this direction applies specifically to the Spill Contingency Plan and the Waste and Hazardous Materials Management Plan.

IR7-7: For each applicable plan, the proponent is required to submit a list of all products associated with the project that are relevant to the scope of the plan. This can be submitted in table format that must include, at a minimum:

a. product name and SDS ID number,
b. storage locations and storage specifications (e.g. covered, heated, secondary containment, availability of spill kits), and
c. confirmation that current Safety Data Sheets will be made readily available to employees on site and in areas where the products are stored and/or handled.

2. Erosion and Sediment Control Plan

The objective of the Erosion and Sediment Control Plan is to describe the operational procedures and best management practices that will be implemented to prevent, minimize, and manage erosion and sedimentation associated with Project construction, operations, and closure.

The Yukon Government notes that the Erosion and Sediment Control Plan currently present mitigation measures at a conceptual level. Although the Plan references the future development of site-specific erosion and sediment control plans during construction and operations (Section 4.1.1), as well as construction management plans (Sections 5.0–8.0), it does not clearly define how these measures will be finalized, implemented, and subject to regulatory review prior to, and during, construction activities. All site-specific erosion and sediment control plans and all construction management plans must be submitted for regulatory review and approval prior to the commencement of any earth-moving or construction activities. To support effective environmental protection and regulatory oversight, the Plan must clearly describe the purpose and intended outcomes of proposed mitigation measures, the methodologies for their implementation, and the adaptive management processes that will be applied if performance objectives are not met.

IR7-8: Provide a comprehensive list of all erosion and sediment control and construction-related plans that will be developed for the Project. Identify which plans will be advanced from conceptual to implementation-ready prior to licensing, and which plans and/or revisions will be developed and submitted for regulatory review and approval post-licensing.

IR7-9: Clearly explain how construction management plans and subsequent updates to the Erosion and Sediment Control Plan will define implementation methods, performance objectives, monitoring programs, reporting, and adaptive management procedures, including how corrective actions will be triggered and applied if performance objectives are not met.

a.

IR7-10: Address the following sediment management considerations, particularly as they relate to Alpha Pond:

a. evaluation of expected sediment accumulation over time, including contributions from Halfway Creek and other disturbed areas,
b. assessment of how sediment accumulation may affect effective storage capacity and peak inflow management,
c. identification of sediment interception infrastructure or techniques to reduce accumulation, and
d. determination of whether periodic sediment removal will be required, and if so, description of an appropriate maintenance plan.

IR7-11: Clarify the design capacity of sedimentation ponds with respect to sediment storage. If sediment volumes are underestimated and pond capacity is exceeded, explain contingency measures that would be implemented or provide clear cross-reference to where this information can be found in the application.

IR7-12: Clarify the approach to assessing sediment storage capacity in large sedimentation ponds during inspections, including whether inspection methodologies described in the Plan are appropriate for large facilities versus small-scale control structures (e.g., check dams).

IR7-13: Provide additional detail regarding the use of temporary settling ponds, including:

a. scenarios under which temporary ponds would be implemented,
b. design criteria and intended lifespan, and
c. how and when temporary ponds transition to permanent erosion and sediment control measures, if applicable.

IR7-14: Clarify reporting commitments for erosion and sediment control inspections and monitoring, including:

a. which plans govern sediment and erosion monitoring (e.g., Environmental Monitoring Plan, construction management plans) as they will require further detail on methodologies and mitigative measures required, and
b. how significant inspection findings impacting critical infrastructure and triggering corrective actions would be documented and communicated to regulators.

IR7-15: Include consistent language and naming conventions for frozen material storage locations throughout the plan. Clearly identify and name frozen material storage areas (e.g., specific piles or storage zones), and ensure terminology aligns with that used in other proposed management plans, including the Waste Rock and Overburden Management Plan (e.g., ice-rich storage area, frozen soil storage area, placement within lifts of the Alpha WRSA). Include cross-references to the other plans where relevant.

3. Spill Contingency Plan

The objective of the Spill Contingency Plan is to outline spill prevention, preparedness, response, and reporting procedures for hazardous materials and substances used and stored at the Project during mine construction, operation and closure.

Yukon Government notes that a new Contaminants Regulation under the *Environment Act* will repeal and replace the existing Contaminated Sites Regulation and Spills Regulation and will come into force on March 1, 2027. The proponent is expected to ensure ongoing compliance with applicable legislation as amended from time to time and to update all relevant management plans to reflect the requirements of the new Regulation when it comes into effect.

Review of the document indicates that several elements related to roles and responsibilities, training, and spill or emergency response may be addressed in other management plans (e.g., Emergency Response Plan, Cyanide Management Plan); however, clear cross-references are not consistently provided.

IR7-16: Clearly indicate where the following items are described, either by including the information directly or by providing explicit cross-references to other approved or submitted management plans:

a. roles and responsibilities of key personnel involved in the handling, use, inspections, inventories, offloading, and on-site receipt of hazardous or specialty materials (e.g., cyanide, LNG),
b. training requirements for personnel involved in offloading, handling, spill response, and emergency response for hazardous or specialty materials, including clarification of task-specific training frequency, and
c. spill response procedures for emergency or large-volume spill events, including escalation beyond initial response actions, including coordination with emergency response teams and external agencies, where applicable.

IR7-17: Include reference to all applicable legislation and guidance documents, including:

a. the *Workers' Safety and Compensation Act* and associated guidance,
b. the *Oil and Gas Act* and Gas Processing Plant Regulations, and
c. the *Public Health and Safety Act*, where spill response may impact public health or nearby communities.

IR7-18: The plan refers to "major spills" and "emergency spills" throughout; however, it is unclear whether these terms correspond to reportable spills under Yukon legislation or represent industry terminology for spill severity. Please revise the plan to use consistent terminology aligned with Yukon legislative requirements and clearly define spill thresholds, severity classifications, and reporting obligations.

IR7-19: Clarify site-specific orientation, onboarding, and refresher training requirements for employees, contractors, and visitors, including:

a. frequency of refresher training,
b. identification of exclusion zones for individuals without required training, and
c. roles and responsibilities for training delivery and oversight.

IR7-20: Include further detail regarding spill prevention measures that will be implemented on site to minimize spill occurrence or extent, such as:

a. pre-operational and pre-/post-shift equipment inspections,
b. mechanical and safety inspections prior to equipment being permitted site access, and
c. proactive identification of potential leak or spill sources.

IR7-21: The Plan indicates that Emergency Response Team (ERT) procedures and equipment will be used for large-scale spills. Provide:

a. applicable training standards for ERT staff, and
b. a list of spill response equipment that are required for large-scale spills and where they will be made available on site.

IR7-22: Confirm how the proposed spill response equipment, containment, and site contingencies are sufficient to respond to a major emergency event involving significant fuel volumes (e.g., multi-tank failure exceeding berm capacity).

IR7-23: Identify who is responsible for monitoring tank farm quantity tracking systems and alarm systems, how often systems are monitored, and who responds when alarms are activated.

IR7-24: Include additional preventative, procedural, and monitoring measures for barge fueling near waterways, including:

a. pre-operation inspections and shut-off mechanisms,
b. active monitoring during fueling,
c. proximity of spill kits and emergency contact information, and
d. requirements for personal flotation devices (PFDs) for workers, including storage locations.

IR7-25: Clarify the position responsible for determining when a spill has been contained and resolved, and who authorizes the resumption of activities (e.g. resume operations, grant access, etc.). Include procedures for inventorying and restocking spill kits following spill response and resolution.

IR7-26: Include throughout the plan any considerations or requirements specific to LNG on-site, including LNG-specific:

a. spill reporting requirements and reportable processes for overflow incidents,
b. containment systems and associated testing requirements, and
c. fire-water requirements and availability for LNG incident response.

IR7-27: Update Section 5.4.1 to describe how to dispose and manage contaminated material that is contaminated by substances other than hydrocarbons.

IR7-28: Clarify what constitutes a “sufficient” number of ERT members required onsite, including maximum and minimum members allowed.

IR7-29: Provide greater detail in Section 7.0 (monitoring and maintenance) to include information such as:

a. spill kit inspection frequency and role responsibilities,
b. LTF inspection requirements,
c. general employee responsibilities related to spill prevention,
d. a list of monitoring and alarm systems, including response and maintenance roles, and
e. any additional routine monitoring and maintenance activities.

Additional editorial, content and formatting updates:

- **IR7-30:** Clarify and standardize references to regulatory agencies throughout the plan and ensure consistent language is used (e.g., Government of Yukon – Department of Environment, Natural Resources Officer, etc.).
- **IR7-31:** Correct spelling of Tr'ondek Hwech'in in Table 5-1.
- **IR7-32:** Clarify whether the heading on page vi titled "YWB EMR Plan Requirements Applicable to the Water Management Plan" is a typographical error. If so, revise the heading to accurately reflect applicability to the Spill Contingency Plan.
- **IR7-33:** Revise in Section 1.1 the post-closure phase timeline to ensure consistency with the Yukon Environment and Socio-Economic Assessment Board's Final Screening Report, which identifies post-closure as beginning in "Year 24 onwards."
- **IR7-34:** Correct the text formatting error between the first and second paragraphs of Section 1.2.
- **IR7-35:** Section 3.3 text related to reportable spills is currently split by several pages of Table 3-1. Consolidate and relocate all text for this section so that it appears together before the table. There is sufficient space to do so, and it will improve ease of reading.
- **IR7-36:** Update references to other management or emergency response plans, clearly identifying whether the document is a standalone plan or an appendix of another plan. For example, identify the Heap Leach Facility Emergency Response Plan as Appendix A of the Site-Wide Emergency Response Plan.
- **IR7-37:** Update Table 6-1 to reflect current Yukon Government and Dawson City emergency service contact information.
- **IR7-38:** Revise the spill report form template (Appendix A) to include a section for photographs and photographic documentation.

4. Waste and Hazardous Materials Management Plan

The objective of the Waste Management Plan and Hazardous Materials Management Plan is to describe procedures for the safe handling, storage, use, transportation, and disposal of waste and hazardous materials associated with the Project.

Yukon government requests that the Proponent update the Waste and Hazardous Materials Management Plan. The following Information Requests outline required revisions and clarifications:

IR7-39: Clearly indicate where the following items are described, either by including the information directly or by providing explicit cross-references to other approved or submitted management plans:

a. roles and responsibilities of key personnel involved in the handling, use, inspections, inventories, offloading, and on-site receipt of hazardous or specialty materials (e.g., cyanide, LNG),
b. clarify where emergency planning and risk assessment for hazardous substances are addressed and confirm whether this information is contained within the Emergency Response Plan, and
c. training requirements for personnel involved in offloading, handling, spill response, and emergency response for hazardous or specialty materials, including clarification of task-specific training frequency.

IR7-40: Include reference to all applicable legislation and guidance documents and confirm conformance with their applicable requirements, including:

a. the *Workers' Safety and Compensation Act* and associated regulations and guidance for storage and handling of materials, and
b. the *Oil and Gas Act* and Gas Processing Plant Regulations for LNG-specific components.

IR7-41: Clarify site-specific orientation, onboarding, and refresher training requirements for employees, contractors, and visitors, including:

a. frequency of refresher training,
b. identification of exclusion zones for individuals without required training, and
c. roles and responsibilities for training delivery and oversight.

IR7-42: Describe the geotechnical and environment assessments and engineering design, for waste and hazardous materials storage and disposal areas including containment design.

IR7-43: LNG fuel is referenced only in terms of storage capacity and location. Update the Plan to:

a. confirm conformance with CSA Z276 and other applicable standards for LNG production, storage, and handling, including provisions for secondary containment and management of snow and rainwater describe waste management specific to LNG,
b. include LNG fuel within the Hazardous Materials Inventory, and
c. ensure spill kits contain appropriate materials for LNG incidents.

IR7-44: Where possible, identify the planned maximum and average quantities of hazardous materials to be stored onsite.

IR7-45: Confirm whether hazardous (special) waste stored in sea cans requires secondary containment and identify the location of any temporary seasonal (spring/fall) sea-can storage areas.

IR7-46: Address the storage and transportation of waste and hazardous materials in proximity to waterways, including barge transport, temporary laydown areas near water, and associated spill prevention and response measures.

IR7-47: Clarify whether the installation of an electric fence around the landfill is a mandatory or conditional requirement under Environment Act permitting.

IR7-48: Describe how access to waste disposal areas and the landfill is controlled, including procedures for gate management and whether access is restricted to authorized personnel only.

IR7-49: Provide additional detail regarding potential risks posed by hazardous materials facilities to worker health, site conditions, and the environment, and describe mitigation measures, including:

a. the location of incinerators and explosive storage relative to powerlines and waterways, and
b. applicable design and separation distances.

IR7-50: Clarify within the plan how the Project will remain consistent with the assessed proponent commitment that recyclable materials and hazardous wastes requiring off-site disposal or recycling will be transported by truck to Whitehorse. The current plan states only that Dawson City waste facilities will not be used and broadly refers to shipment off-site to registered and accredited hazardous waste management facilities in Yukon, not clearly identifying Whitehorse as the destination.

IR7-51: Update Appendix B and revise disposal pathways accordingly to reflect that treated wood is not considered inert for the purposes of *Environment Act* permitting.

Additional editorial, content and formatting updates:

IR7-52: Review and update the Information Requirements Table to eliminate duplicate entries, for example the final entry on page viii, where the second component (“identify each hazardous material…”) duplicates earlier requirements and ensure plan sections are still appropriately referenced. It was also noticed while the majority of plan guidance requirements are referenced, a few were not noted.

IR7-53: When referencing other management plans, clearly identify whether the document is a standalone plan or an appendix of another plan. For example, identify the Groundwater or Geochemical Monitoring Plans are in fact Appendices of the Environmental Monitoring and Adaptive Management Plan.

IR7-54: Revise the post-closure phase timeline to ensure consistency with the Yukon Environment and Socio-Economic Assessment Board's Final Screening Report, which identifies post-closure as beginning in "Year 24 onwards."