

APPENDIX G.8.8

Snow Management Plan



Baffinland Iron Mines Corporation

BIM-5200-PLA-0006 SNOW MANAGEMENT PLAN

BIM-5200-PLA-0006 Snow Management Plan	Issue Date: 2024-03-31	Page 1 of 42
Site Wide	Next Review date: 2025-03-28	Revision: 7
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DOCUMENT REVISION RECORD

Issue Date MM/DD/YY	Rev #	Prepared By	Reviewed By	Approved By	Description of change and purpose of issue
11/17/16	0	JM	JM	SP	Issued for Use
03/09/17	1	KB	KB	LT	Issued for Use
11/02/17	2	BL/DR/BW	BL/DR/BW	BB	Issued for Use
12/21/18	3	AV	AV	FG	Issued for Use
03/26/21	4	AM	AM	FG	Issued for Use
03/31/22	5	CD	CD	FG	Issued for Use
03/31/23	6	TS	TS	FG	Issued for Use
02/14/24	7	TS	CD	MB	Issued for Use

TRACK CHANGES TABLE

Index of Major Changes/Modifications in Revision 7

Item No.	Description of Change	Relevant Section
1	Addition of TARP Tables	5.4
2	Addition of Adaptive Management Section	6.0
3	Adjustment to Mine Site Snow Stockpiles	Appendices C and H
4	Adjustment to Milne Port Snow Stockpiles	Appendix D
5	Adjustment to Tote Road Snow Stockpile	Appendix F

BIM-5200-PLA-0006 Snow Management Plan	Issue Date: 2024-03-31	Page 2 of 42
Site Wide	Next Review date: 2025-03-28	Revision: 7
Document Owner: Environmental Superintendent	Document Approver: General Manager	
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TABLE OF CONTENTS

1.	PURPOSE	5
2.	APPLICATION	5
3.	DEFINITIONS AND ABBREVIATIONS	5
3.1	Abbreviations	5
4.	SNOW MANAGEMENT PROTOCOL	5
4.1	Area-Specific Snow Management Guidelines	5
4.2	General Environmental Mitigation Measures	6
4.3	Freshet Preparation Mitigation Measures	7
4.4	Snow Stockpile Locations	7
5.	MONITORING AND REPORTING	9
5.1	Inspections	9
5.2	Water Quality Monitoring	9
5.3	Water Quality Reporting	9
5.4	Trigger Action Response Plan	10
6.	ADAPTIVE MANAGEMENT STRATEGIES	13
7.	RESPONSIBILITIES	13
8.	PRE-REQUISITE COMPETENCY SKILLS	15
9.	RELATED DOCUMENTS	16
9.1	Relationships to other Management Plans & Policies	16

BIM-5200-PLA-0006 Snow Management Plan	Issue Date: 2024-03-31	Page 3 of 42
Site Wide	Next Review date: 2025-03-28	Revision: 7
Document Owner: Environmental Superintendent	Document Approver: General Manager	
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TABLE OF FIGURES

Figure 1: Snow Management – Mine Site (Sheet 1 of 2)	22
Figure 2: Snow Management – Mine Site (Sheet 2 of 2)	23
Figure 3: Snow Management – Milne Port (Sheet 1 of 2)	26
Figure 4: Snow Management – Milne Port (Sheet 2 of 2)	27
FIGURE 5: SNOW MANAGEMENT– TOTE ROAD (SHEET 1 OF 6).....	32
FIGURE 6: SNOW MANAGEMENT– TOTE ROAD (SHEET 2 OF 6).....	33
FIGURE 7: SNOW MANAGEMENT– TOTE ROAD (SHEET 3 OF 6).....	34
Figure 8: Snow Management – Tote Road (Sheet 4 of 6).....	35
Figure 9: Snow Management – Tote Road (Sheet 5 of 6).....	36
FIGURE 10: SNOW MANAGEMENT– TOTE ROAD (SHEET 6 OF 6)	37
Figure 11: Snow Management - Haul Road and Deposit No. 1.....	42

TABLE OF TABLES

Table 1 Area-Specific Snow Management Guidelines	6
Table 2 Environmental Concerns and Mitigation Measures.....	6
Table 3 High Risk Snow Removal Locations	7
Table 4 Snow Stockpile Siting Criteria.....	8
Table 5 Monitoring Associated with the Snow Management Plan	11

TABLE OF APPENDICES

Appendix A Sustainable Development Policy, and the Health, Safety and Environment Policy	17
Appendix B Snow Stockpile Inspection Form	18
Appendix C General Site Snow Management Guidelines – Site Services	20
Appendix D Milne Port Ore Stockpile Facility Snow Management Guidelines – Shiploading.....	24
Appendix E Quarry Snow Management Guidelines – Road Maintenance	28
Appendix F Tote Road Snow Management Guidelines – Road Maintenance	30
Appendix G Crushing Facility Snow Management Guidelines – Crusher Department.....	38
Appendix H Mine Haul Road and Deposit 1 Snow Management Guidelines – Mine Operations	40

BIM-5200-PLA-0006 Snow Management Plan	Issue Date: 2024-03-31	Page 4 of 42
Site Wide	Next Review date: 2025-03-28	Revision: 7
Document Owner: Environmental Superintendent	Document Approver: General Manager	
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1. PURPOSE

The purpose of this Plan is to outline the management practices and procedures employed at the Mary River Project (Project) to manage snow accumulation. The practices and procedures were developed to ensure the safety of Project personnel and maintain compliance with Baffinland's environmental permits, licenses and approvals including, but not limited to, the following:

- Project Certificate No. 005, Amendment No. 1 (Project Certificate);
- Type 'A' Water Licence – 2AM-MRY1325, Amend. No. 1 (Type 'A' Water Licence); and,
- Commercial Lease No. Q13C301 (Commercial Lease).

2. APPLICATION

The Plan applies to all departments and to all Baffinland employees, contractors and visitors when involved in controlled activities.

3. DEFINITIONS AND ABBREVIATIONS

3.1 ABBREVIATIONS

Statement	Definition
AEMP	Aquatic Effects Monitoring Plan
ERP	Emergency Response Plan
GEVP	Group Executive Vice President
NWB	Nunavut Water Board
QIA	Qikiqtani Inuit Association
SMP	Snow Management Plan
SNP	Surveillance Network Program
SWAEMP	Surface Water and Aquatic Ecosystem Management Plan
TRMP	Tote Road Monitoring Program

4. SNOW MANAGEMENT PROTOCOL

4.1 AREA-SPECIFIC SNOW MANAGEMENT GUIDELINES

Table 1 outlines the area-specific snow management guidelines for the Project, which are included as appendices to this Plan. The area-specific snow management guidelines were developed to ensure the safety of Project personnel and compliance with Baffinland's environmental permits, licenses and approvals.

In addition to the area-specific guidelines, general snow management practices and environmental mitigation measures implemented at the Project are outlined in Section 4.2.

BIM-5200-PLA-0006 Snow Management Plan	Issue Date: 2024-03-31	Page 5 of 42
Site Wide	Next Review date: 2025-03-28	Revision: 7
Document Owner: Environmental Superintendent	Document Approver: General Manager	
The information contained herein is proprietary to Baffinland Iron Mines Corporation (BIM) and used solely for the purpose for which it is supplied. It shall not be disclosed in whole or in part, to any other party, without the express permission in writing by BIM. CONTROLLED IN CDMS. UNCONTROLLED WHEN PRINTED OR SAVED.		

TABLE 1 AREA-SPECIFIC SNOW MANAGEMENT GUIDELINES

Appendix ¹	Project Area	Responsible Department
C	General Infrastructure (Mine Site/Milne Port)	Site Services
D	Milne Port Ore Stockpile Facility	Shiploading
E	Milne Port and Mine Site Quarry Operations	Road Maintenance
F	Tote Road	Road Maintenance
G	Mine Site Crushing Facility	Crusher Operations
H	Mine Haul Road and Deposit 1	Mine Operations

¹Appendix B provides the general inspection form for approved snow stockpile locations at the Project.

4.2 GENERAL ENVIRONMENTAL MITIGATION MEASURES

The management of snow at the Project has the potential to affect site water quality and other environmental components. Table 2 outlines the environmental concerns, proposed mitigation measures, and departments responsible for snow management activities at the Project. Refer to Sections 5.0 and 7.0 of this Plan for additional details on the roles and responsibilities of Project personnel, and the monitoring and reporting requirements for snow management activities at the Project.

TABLE 2 ENVIRONMENTAL CONCERNS AND MITIGATION MEASURES

Environmental Concern	Proposed Mitigation Measures	Responsible Department
Release of sediment from snowmelt during freshet into nearby water bodies.	a) Implement sedimentation mitigation measures (i.e. silt fences, rip-rap) informed by water quality monitoring and routine inspections and in accordance with the SWAEMP. b) Maintain a 31 meter setback of stockpile limits from the ordinary High Water Mark of nearby water bodies.	a) Operational Departments and Environment Department b) Operational Departments
Release of debris (i.e. metal, wood, garbage, etc.) and contaminants (i.e. spilled fuel, sewage, etc.) from snow stockpiles as snow melts.	a) Inspect and confirm the absence of contaminants in snow accumulation by equipment operators prior to stockpiling and management activities. b) Segregate and properly dispose of contaminated snow and/or debris from snow stockpiles on an ongoing basis as snow melts throughout the year and debris/contaminants surface. This is to be completed as per the Spill Contingency Plan, Waste Management Plan, or other applicable Project management plans. c) Routinely inspect melting stockpiles.	a) Operational Departments b) Operational Departments c) Operational Departments and Environment Department
Hindrance/blockage of meltwater flow during freshet due to snow stockpiling and management activities.	a) Maintain a 31 meter setback of stockpile limits from nearby water bodies and culverts. b) Apply the area-specific guidelines detailed in appendices C - H.	a) Operational Departments b) Operational Departments

4.3 FRESHET PREPARATION MITIGATION MEASURES

Rapid snowmelt during freshet has the potential to negatively impact site water quality and infrastructure. To mitigate the impacts of freshet, high-risk locations require snow removal prior to the onset of freshet conditions. Across the facilities clean snow that is not in contact with ore is removed to designated areas outside of the associated catchment areas as required. High-risk locations include culverts, check dams, laydowns and areas prone to pooling water. Table 3 outlines the specific high-risk locations, mitigations measures, and responsible department.

TABLE 3 HIGH RISK SNOW REMOVAL LOCATIONS

Location	Mitigation Measure	Responsible Department
Quarry	De-watering	Road Maintenance
High-Risk culverts on the Tote Road	Snow removal/steam application	Site Services/Road Maintenance
Air Strip (Weatherhaven Access Road)	Snow removal/dewatering	Site Services
Check dams at CV-186/187	Snow removal	Site Services
Laydown 2	Snow removal/dewatering	Site Services
Waste Rock Facility (ditching, roads, ring road, WTP pad)	Snow removal	Mine Operations
Crusher Pad	Grading pad as per design/ dewatering	Crusher
Culvert at the NW corner of the Crusher Pad	Snow removal	Crusher
Shiploading (roads, reclaim belt areas)	Snow removal	Shiploading
Ore pad	Grading pad as per design/ dewatering	Shiploading

4.4 SNOW STOCKPILE LOCATIONS

Approved snow stockpile locations for management of snow accumulation for the Project are shown in Figures 1 - 11. The approved snow stockpile locations were selected based on field observations to achieve compliance with the criteria outlined in Table 4.

BIM-5200-PLA-0006 Snow Management Plan	Issue Date: 2024-03-31	Page 7 of 42
Site Wide	Next Review date: 2025-03-28	Revision: 7
Document Owner: Environmental Superintendent	Document Approver: General Manager	
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TABLE 4 SNOW STOCKPILE SITING CRITERIA

Parameter	Reference
Snow stockpile limits will be within the limits defined in the Commercial Lease and will allow for the maintenance of a 50 metre undisturbed buffer between Project infrastructure/ activities and the Commercial Lease limits.	Commercial Lease (Section 2.5)
Snow stockpile limits will be at least 31 metres away from the ordinary High Water Mark of nearby waterbodies.	Type 'A' Water Licence (Part D, Item 25; Part E, Item 17)

Relocating approved snow stockpiles and establishing new snow stockpile locations may be required depending on meteorological conditions and the overall performance of approved snow stockpile locations. In the event that new snow stockpiles need to be established or existing snow stockpiles need to be relocated to meet operational requirements, the locations of new or relocated snow stockpiles will be compliant with the criteria presented in Table 4. Modified or new snow stockpile locations and modifications to snow management strategies must be approved by the Environment Department prior to implementation.

Best efforts will be made to follow this Plan and to use the approved snow stockpile locations to manage snow accumulation at the Project. However, during extreme winter storm events, Project operations may be required to temporarily deposit snow at locations that do not meet the criteria listed in Table 4 to maintain site access for essential and emergency response vehicles, and to ensure the health and safety of Project personnel. Following such weather events, Baffinland will endeavour to transport snow from temporary locations to the approved snow stockpile locations within a period of less than ten (10) days.

Where snow stockpiles are within close proximity to the Commercial Lease limits, markers will be installed in the field to delineate snow stockpile limits.

BIM-5200-PLA-0006 Snow Management Plan	Issue Date: 2024-03-31	Page 8 of 42
Site Wide	Next Review date: 2025-03-28	Revision: 7
Document Owner: Environmental Superintendent	Document Approver: General Manager	
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5. MONITORING AND REPORTING

5.1 INSPECTIONS

5.1.1 Operational Inspections

Operational departments will conduct routine inspections of their respective areas to ensure snow management in accordance with this Plan. Non-conformances or issues of concern reported or identified during inspections will be addressed promptly under the direction of the Department or Project Supervisor.

5.1.2 Environmental Inspections

Snow management practices and snow stockpile locations will be inspected by the Environment Department monthly when there is snow in the snow stockpiles and at an increased weekly frequency during freshet (typically May 15 to June 30); commencing when snowmelt conditions begin.

Inspections and compliance with this Plan will be documented using the Snow Management Inspection Form provided in Appendix B. Non-conformances or issues of concern identified will be forwarded to the appropriate Operational Department or to Projects to be addressed.

5.2 WATER QUALITY MONITORING

The monitoring of snowmelt and surface water runoff at the Mine Site and Milne Port will be monitored via the SNP stipulated by the Project's Type 'A' Water Licence, and along the Tote Road via the TRMP. Additional temporary monitoring locations may be established during freshet to support the SNP and TRMP for areas down gradient of snow stockpile locations. Water quality monitoring stations used for monitoring snowmelt and surface water runoff for snow stockpiles on the Mine Site and Milne Port are presented in Figures 1 – 4, Appendix C and D. As snow stockpiles are transient in nature, temporary monitoring locations are reassessed regularly and adjusted as necessary to ensure representative monitoring of down gradient receptors.

Frequency of water quality monitoring will be consistent with existing monitoring programs (i.e. SNP, TRMP). Refer to the SWAEMP for additional details on how surface water quality is managed and monitored at Project sites.

5.3 WATER QUALITY REPORTING

Monitoring results of the SNP, TRMP and temporary freshet monitoring stations will be reported annually in the QIA & NWB Annual Report for Operations. Results of the SNP will also be reported monthly as required by the Project's Type 'A' Water Licence.

BIM-5200-PLA-0006 Snow Management Plan	Issue Date: 2024-03-31	Page 9 of 42
Site Wide	Next Review date: 2025-03-28	Revision: 7
Document Owner: Environmental Superintendent	Document Approver: General Manager	
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5.4 TRIGGER ACTION RESPONSE PLAN

Consistent with the adaptive management strategies described in Section 6.0, trigger action response plans (TARPs) have been developed for key project activities and related monitoring plans. This includes the identification of low, moderate, and high action responses that correspond to low, moderate, and high-risk conditions. Table 5 outlines the monitoring and response requirements for the management and stockpiling of snow onsite.

Monitoring programs associated with the TARP focus on short-term detection of impacts and immediate to short-term responses. These short-term impacts and responses are intended to provide immediate feedback pertaining to the effectiveness of mitigation measures, allowing changes to be made in real-time. They also generate most of the monitoring data that feeds into annual reporting, which includes analysis and reporting of annual monitoring data along with trend analyses using historical monitoring data.

The review of trends over time through the annual review process will inform adaptive management in the long term. This may include triggering of plan updates as described in Section 6.

BIM-5200-PLA-0006 Snow Management Plan	Issue Date: 2024-03-31	Page 10 of 42
Site Wide	Next Review date: 2025-03-28	Revision: 7
Document Owner: Environmental Superintendent	Document Approver: General Manager	
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TABLE 5 MONITORING ASSOCIATED WITH THE SNOW MANAGEMENT PLAN

Project Activity	Objective	Performance Indicator	Monitoring Program / Plan	Condition Status			Pre-defined Response(s)		
				Low Risk	Moderate Risk	High Risk	Low Risk	Moderate Risk	High Risk
Snow stockpiling from Project roadways and infrastructure	Stockpile snow in designated locations removed from lease boundaries and sensitive receptors	Stockpile boundaries with respect to Commercial Lease boundary	Inspections	Snow stockpiles exceed the boundaries of the approved snow stockpile location, infringing on buffer zone of Commercial Lease boundary.	Snow stockpiles exceed the boundaries of the approved snow stockpile location, infringing on the Commercial Lease boundary.	Not applicable ²	<u>Env't Dept</u> : Notify Road Maintenance that stockpile footprint extends beyond approved area; demarcate approved boundaries. <u>Responsible Dept</u> ¹ : Re-handle snow to be within approved area; identify alternate snow stockpile area(s).	<u>Env't Dept</u> : Notify Road Maintenance that stockpile footprint extends beyond approved area; demarcate approved boundaries. Apply for OEN if stockpile cannot be moved. <u>Responsible Dept</u> ¹ : Cease depositing snow in area; re-handle snow to be within approved area if possible. Identify alternate snow stockpile area(s).	Not applicable ²
		Stockpile boundaries with respect to sensitive receptors	Inspections	Snow stockpiles exceed the boundaries of the approved snow stockpile location, with no infringement on sensitive receptors.	Snow stockpiles exceed the boundaries of the approved snow stockpile location, infringing on sensitive receptors.	Not applicable ²	<u>Env't Dept</u> : Notify responsible department that stockpile footprint extends beyond approved area; demarcate approved boundaries and sensitive receptors. <u>Responsible Dept</u> ¹ : Re-handle snow to be within approved area; identify alternate snow stockpile area(s).	<u>Env't Dept</u> : Notify responsible department that stockpile footprint extends beyond approved area; demarcate approved boundaries and sensitive receptors. <u>Responsible Dept</u> ¹ : Cease depositing snow in area; Implement additional mitigation with respect to proximity to water bodies, archaeological sites (snow fence), etc.	Not applicable ²
		Unauthorized snow stockpiles	Inspections	Extreme weather event has resulted in temporary snow stockpiles in unapproved areas.	Snow has been stockpiled outside of disturbed area classification	Not applicable ²	<u>Responsible Dept</u> ¹ : Redistribute snow to approved stockpile areas following extreme weather event prior to spring melt.	<u>Env't Dept</u> : Assess whether area can be an approved stockpile location. Implement training regarding snow stockpiling and obtaining approvals. <u>Responsible Dept</u> ¹ : Cease snow piling activity. Divert snow to designated approved snow stockpile.	Not applicable ²

Project Activity	Objective	Performance Indicator	Monitoring Program / Plan	Condition Status			Pre-defined Response(s)		
				Low Risk	Moderate Risk	High Risk	Low Risk	Moderate Risk	High Risk
Snow stockpiling from Project roadways and infrastructure	Avoid or minimize the release of sediment and other contaminants from melting snow stockpiles	Ammonia, Nitrate, pH, Conductivity, TSS and Oil and Grease	Surveillance Network Program	Refer to the Surface Water and Aquatic Ecosystem Management Plan (SWAEMP)					
	Avoid or minimize the potential erosion caused by melting snow stockpiles	Stability of down gradient environment	Inspections	Suspected erosion caused by melting snow down gradient of snow stockpile location.	Erosion caused by melting snow down gradient of snow stockpile location.	Not applicable ²	<u>Env't Dept</u> : Monitor the area of suspected erosion; advise on enhanced mitigation measures. <u>Responsible Dept</u> ¹ : Implement enhanced mitigation measures.	<u>Env't Dept</u> : Investigate the erosion event and suitability of snow stockpile location; identified enhanced mitigation measures. <u>Responsible Dept</u> ¹ : Implement enhanced mitigation measures.	Not applicable ²
Snow stockpiling from ore handling facilities	Avoid or minimize the uptake of ore during snow clearing at ore handling facilities	Snowplow blade 2” off surface Presence of ore in snow stockpile	Inspections	Snow equipment operator not adhering to operational requirements (e.g., blade 2” off ground to minimize uptake of ore into snowpack).	Ore observed in snow stockpiles.	Not applicable ²	<u>Responsible Dept</u> ¹ : Modify snow clearing methodology. Provide additional training to snow equipment operators. <u>Env't Dept</u> : Review relevant snow management guidelines.	<u>Responsible Dept</u> ¹ : Place/relocate ore-containing snow into stockpiles within ore stormwater containment area.	Not applicable ²
Snow clearing along Tote Road	Avoid or minimize barrier effects on wildlife movement	Snowbank height	Snowbank height monitoring (TEMMP)	Addressed in the Terrestrial Environment Mitigation and Monitoring Plan (TEMMP) and the Roads Management Plan					

NOTES:

1. Responsible Department refers to the following departments - Projects Department for construction areas; Site Services Department for general project infrastructure; Ore Handling and Shiploading Department for Milne Port Ore Stockpile Facility; Road Maintenance Department for the Tote Road, Crushing Department for Mine Site Crushing Facility; Mine Operations Department for Mine Haul Road and Deposit No. 1.
2. High Risk status and responses are not identified for the Snow Management Plan. High risk scenarios are well outside predictions or thresholds, with severe and defined consequences to the health of people, wildlife or the receiving environment. Management of snow on Site will not result in such risk levels at this time, however this will be reviewed per Section 6.0 to confirm this is still the case on an on-going basis.

6. ADAPTIVE MANAGEMENT STRATEGIES

Baffinland is committed to continuous improvement of its work activities with the aim of reducing risks to the environment and improving operational safety and efficiency. The strategy employed at Baffinland is regular monitoring supported by operational change and adoption of additional mitigation measures if warranted. Examples of adaptive management strategies for snow management activities at the Project include potential relocation of snow stockpile locations, installation of erosion and sediment control measures, and application of steam to culverts to maintain free flowing conditions; based on operational, health and safety, and environmental monitoring results.

As per the requirements of Baffinland's HSE Management Framework, Baffinland will conduct and document management reviews of this Plan on a regular basis. Such reviews will ensure integration of monitoring results for this Plan with other aspects of the Project and implementation of necessary adjustments as required. These reviews also provide a formal mechanism to assess effectiveness of management in achieving Baffinland's objectives and maintaining ongoing compliance with Project permits and authorizations.

7. RESPONSIBILITIES

Role	Responsibility
GEVP/ General Manager	<ul style="list-style-type: none"> Reports to the Chief Executive Officer Provides oversight for all Project operations and allocating the necessary resources for Project operations including snow management.
Department Superintendent/ Manager/ Project Manager	<ul style="list-style-type: none"> Reports to the General Manager. Reading and understanding this SMP and implementing it within their department and areas of operation including directing departmental personnel on the appropriate mitigation measures and strategies for managing snow in their Project area. Implementing an inspection schedule and conducting routine inspections for areas of operation to ensure compliance with this SMP. Promptly directing corrective actions required to address non-conformances or issues of concern identified during inspections. Submitting requests to the Environment Department to modify snow management strategies or locations within the department's areas of operation. Reporting any visual observations, or reports of non-compliances with this SMP to the Environment Department.
Department and Project Contractor Supervisors	<ul style="list-style-type: none"> Reports to the Department Superintendent/Manager/Project Manager. Reading and understanding this SMP and implementing it within their areas of operation including directing departmental and contract personnel on the appropriate mitigation measures and strategies for managing snow in their Project area.

BIM-5200-PLA-0006 Snow Management Plan	Issue Date: 2024-03-31	Page 13 of 42
Site Wide	Next Review date: 2025-03-28	Revision: 7
Document Owner: Environmental Superintendent	Document Approver: General Manager	
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	<ul style="list-style-type: none"> • Conducting routine inspections for areas of operation to ensure compliance with this SMP. • Promptly directing corrective actions required to address non-conformances or issues of concern identified during inspections. • Reporting any visual observations, or reports of non-compliances with this SMP or issues identified during inspections to the Department Superintendent/Manager/Project Manager and the corrective action(s) proposed for implementation to address the non-conformances or issue(s).
Equipment Operators	<ul style="list-style-type: none"> • Reports to Department Supervisor. • Reading and understanding this SMP and implementing it within their areas of operation. • Performing snow management operations in accordance with this SMP and the area-specific snow management guidelines outlined in Appendix C to Appendix H. • Reporting any non-conformances or issues of concern observed to their respective supervisors.
Environment (Sustainable Development) Department	<ul style="list-style-type: none"> • Supporting the management of the Project's snow management by advising operational departments and obtaining the appropriate regulatory approvals for necessary changes and modifications. • Revising and approving this SMP to reflect modifications to snow management strategies and/or snow stockpile locations. • Conducting inspections of Project snow management practices and snow stockpile locations and surrounding areas to ensure compliance with this SMP. • Providing direction to address non-conformances or issues of concern identified during inspections, as necessary. • Conducting water quality sampling and completing the required water quality monitoring and reporting. • Ensuring that managers, superintendents, supervisors and their staff are familiar with this SMP and its protection measures.

BIM-5200-PLA-0006 Snow Management Plan	Issue Date: 2024-03-31	Page 14 of 42
Site Wide	Next Review date: 2025-03-28	Revision: 7
Document Owner: Environmental Superintendent	Document Approver: General Manager	
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8. PRE-REQUISITE COMPETENCY SKILLS

Baffinland staff and contractors working on site receive environmental training as part of the site orientation to achieve a basic understanding of their obligations regarding environmental compliance with regulatory requirements, commitments and best practices.

Operations superintendents and contractor supervisors are provided this Plan, and receive additional training with respect to the requirements outlined in this Plan. In addition, supervising level staff and sub-contractors are provided the Operational Environmental Standards (found in the Project's Environmental Protection Plan) as a written guidance for their work.

Targeted environmental awareness training will be provided to both individuals and groups of workers assuming a specific authority or responsibility for environmental management or those undertaking an activity with an elevated high risk of environmental impact. These will be delivered in the form of toolbox meetings or other means as appropriate.

The content of the environmental component of the site orientation will include at a minimum:

- Location of environmental sensitivities;
- Location of additional information on environmental matters;
- Due diligence responsibilities;

BIM-5200-PLA-0006 Snow Management Plan	Issue Date: 2024-03-31	Page 15 of 42
Site Wide	Next Review date: 2025-03-28	Revision: 7
Document Owner: Environmental Superintendent	Document Approver: General Manager	
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9. RELATED DOCUMENTS

9.1 RELATIONSHIPS TO OTHER MANAGEMENT PLANS & POLICIES

The management of snow at the Project has the potential to affect site water quality and other environmental components. Therefore, this plan must be viewed in conjunction with the following Management Plans developed for the Project:

Document Number	Document Description
BIM-5200-PLA-0003	Environmental Protection Plan (EPP)
BIM-5200-PLA-0009	Surface Water and Aquatic Ecosystem Management Plan (SWAEMP)
BIM-5200-PLA-0022	Fresh Water Supply, Sewage, and Wastewater Management Plan (FWSSWMP)
BIM-5200-PLA-0023	Aquatic Effects Monitoring Plan (AEMP)
BIM-5200-PLA-0027	Roads Management Plan
BIM-5000-PLA-0005	Emergency Response Plan (ERP)
BIM-5200-PLA-0012	Spill Contingency Plan
BIM-5200-PLA-0013	Waste Management Plan
BIM-5200-PLA-0007	Hazardous Materials and Hazardous Waste Management Plan (HMHWMP)

Baffinland's Health, Safety and Environment Policy (BIM-5000-POL-0001) is the company's commitment to achieve a safe, health and environmentally responsible workplace. The policy is available on the Baffinland Document Portal: <https://baffinland.com/media-centre/document-portal/>, and also referenced in Appendix A.

Baffinland's Sustainable Development Policy (BAF-PH1-800-POL-0002) identifies the company's commitment internally and to the public to operate in a manner that is environmentally responsible, safe, fiscally responsible and respectful of the cultural values and legal rights of the Inuit. The Sustainable Development Policy is available on the Baffinland Document Portal: <https://baffinland.com/media-centre/document-portal/>, and also referenced in Appendix A.

All employees and contractors are expected to comply with the contents of both policies.

BIM-5200-PLA-0006 Snow Management Plan	Issue Date: 2024-03-31	Page 16 of 42
Site Wide	Next Review date: 2025-03-28	Revision: 7
Document Owner: Environmental Superintendent	Document Approver: General Manager	
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**APPENDIX A SUSTAINABLE DEVELOPMENT POLICY, AND THE HEALTH, SAFETY
AND ENVIRONMENT POLICY**

Available at <https://baffinland.com/media-centre/document-portal/>.

BIM-5200-PLA-0006 Snow Management Plan	Issue Date: 2024-03-31	Page 17 of 42
Site Wide	Next Review date: 2025-03-28	Revision: 7
Document Owner: Environmental Superintendent	Document Approver: General Manager	
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APPENDIX B SNOW STOCKPILE INSPECTION FORM

BIM-5200-PLA-0006 Snow Management Plan	Issue Date: 2024-03-31	Page 18 of 42
Site Wide	Next Review date: 2025-03-28	Revision: 7
Document Owner: Environmental Superintendent	Document Approver: General Manager	
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BAFFINLAND IRON MINES MANAGEMENT PLAN

BIM-5200-PLA-0006 SNOW MANAGEMENT PLAN



Snow Management Inspection

Date:

Inspecting Personnel:

Camera ID:

Stockpile Location:

GPS ID:

	Condition	Yes	No	N/A	Item of Concern	Corrective Action
1	Is the stockpile currently in use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	If so, what is the current % full:	
2	Are there any vehicles/heavy equipment working in the area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
3	Is the stockpile boundary poorly marked?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
4	Is the snow being stockpiled outside of the boundary area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
5	Does the snow contain any contamination? (i.e. coolant, oil, sewage, gravel, etc.)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	List type and volume of contamination found:	
6	Have the natural drainage patterns of the area been altered?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
7	Is there any refuse within the stockpiled snow? (i.e. metal, wood, garbage, etc.)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
8	If refuse is present, was it removed?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
9	Photos taken?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Photo #:	

Additional Notes:

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BIM-5200-PLA-0006 Snow Management Plan	Issue Date: 2024-03-31	Page 19 of 42
Site Wide	Next Review date: 2025-03-28	Revision: 7
Document Owner: Environmental Superintendent	Document Approver: General Manager	
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APPENDIX C GENERAL SITE SNOW MANAGEMENT GUIDELINES – SITE SERVICES

BIM-5200-PLA-0006 Snow Management Plan	Issue Date: 2024-03-31	Page 20 of 42
Site Wide	Next Review date: 2025-03-28	Revision: 7
Document Owner: Environmental Superintendent	Document Approver: General Manager	
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General Site Snow Management Guidelines – Site Services

To manage snow around general infrastructure at the Mine Site and Milne Port, the following guidelines shall be followed by the Site Services Department to ensure compliance with the SMP:

- To minimize the amount of debris collected and mixed with stockpiled snow, Project personnel shall remove debris from the area prior to snow management activities. This may include measures such as avoiding heavily littered areas until the debris can be sufficiently removed.
- Snow around general infrastructure at the Mine Site and Milne Port shall be stockpiled at the approved snow stockpile locations identified in Figures 1 - 4.
- Where practical, snow should be removed or cleared in the same direction as the prevailing winds of the area and/or to the downhill side. This will minimize the amount of drifting that occurs across laydowns and roads during winter months and reduce the amount of meltwater that will come in contact with Project infrastructure (i.e. roads, culverts, etc.) during freshet.
- Snow should be carried from one side of the road to the other and not split down the middle and pushed to both sides. This will reduce the amount of drifting that occurs across roads and the amount of passes required by equipment to effectively clear snow accumulation.
- When removing snow with graders near culverts, rotate the moldboard to carry the snow past and away from culverts before moving snow to the edge of the road.
- Exercise caution when clearing snow near ditches and berms, making sure not to alter existing infrastructure. Snow should not be plowed into ditches.
- To avoid debris from being released and windblown, Site Services personnel are required to monitor melting snow stockpiles and collect debris as it surfaces throughout the year. Depending on the rate of snowmelt and the amount of debris within the stockpiled snow, collection of debris may be necessary on a daily basis throughout freshet and until the stockpiled snow has completely melted.
- Site Services is responsible for managing the snow stockpile locations at the Mine Site and Milne Port. Site Services will be notified if snow stockpile locations under their management are required to be used by other operational departments or by Projects due to excess snow accumulation in other areas of the Project.
- Site Services must notify and receive approval from the Environment Department prior to using the overflow snow stockpile locations at the Mine Site.

If it was necessary to deposit snow at unapproved temporary snow stockpile locations following an extreme winter storm event to maintain site access and ensure health and safety, Site Services will endeavour to transport the snow from the temporary locations to the approved snow stockpile locations within a period of less than ten (10) days or before the melt starts to occur.

BIM-5200-PLA-0006 Snow Management Plan	Issue Date: 2024-03-31	Page 21 of 42
Site Wide	Next Review date: 2025-03-28	Revision: 7
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FIGURE 1: SNOW MANAGEMENT – MINE SITE (SHEET 1 OF 2)

BIM-5200-PLA-0006 Snow Management Plan	Issue Date: 2024-03-31	Page 22 of 42
Site Wide	Next Review date: 2025-03-28	Revision: 7
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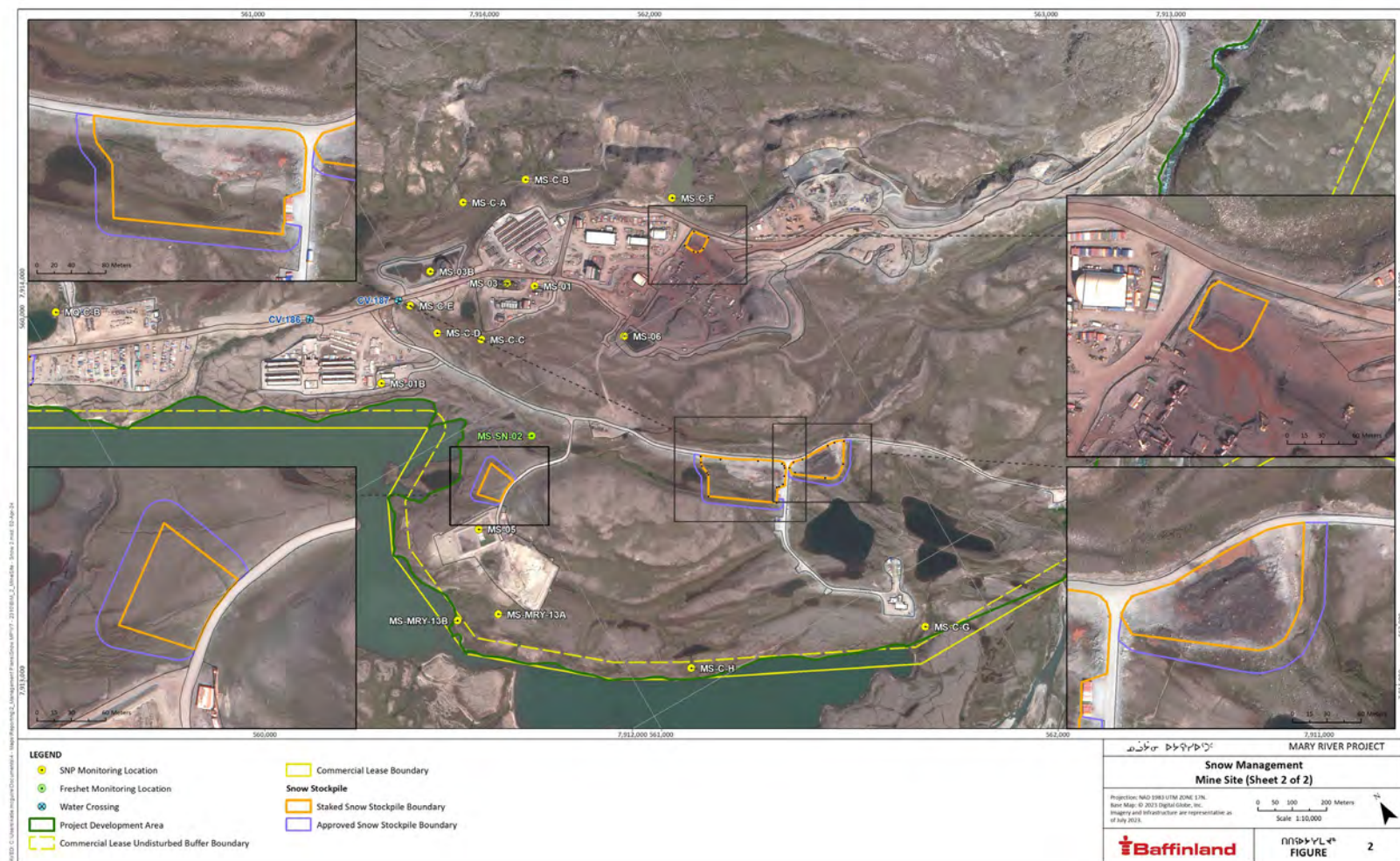


FIGURE 2: SNOW MANAGEMENT – MINE SITE (SHEET 2 OF 2)

BIM-5200-PLA-0006 Snow Management Plan	Issue Date: 2024-03-31	Page 23 of 42
Site Wide	Next Review date: 2025-03-28	Revision: 7
Document Owner: Environmental Superintendent	Document Approver: General Manager	
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**APPENDIX D MILNE PORT ORE STOCKPILE FACILITY SNOW MANAGEMENT
GUIDELINES – SHIPLOADING**

BIM-5200-PLA-0006 Snow Management Plan	Issue Date: 2024-03-31	Page 24 of 42
Site Wide	Next Review date: 2025-03-28	Revision: 7
Document Owner: Environmental Superintendent	Document Approver: General Manager	
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Milne Port Ore Stockpile Facility Snow Management Guidelines

To manage snow at the Milne Port Ore Stockpile Facility, the following guidelines will be followed by the Shiploading Department to ensure compliance with the SMP:

- No ore impacted snow shall leave the Ore Stockpile Facility.
- Snow shall be stockpiled at the approved locations identified in Figure 3.
- To minimize the amount of debris collected and mixed with stockpiled snow, Project personnel shall remove debris from the area prior to snow removal. This may include measures such as avoiding heavily littered areas until the debris can be sufficiently removed.
- Following winter storm events, snow may be stockpiled at temporary locations within the Ore Stockpile Facility until the snow can be transported to the approved stockpile locations identified in Figure 3.
- The Shiploading Department will conduct routine monitoring of stockpiled snow to ensure that minimal amounts of ore and debris are being mixed in during snow management activities. Routine inspections of approved snow stockpiles will also be completed monthly (and weekly during freshet) using the Snow Stockpile Inspection Form (Appendix B) by the Environment Department.
- To minimize the amount of ore (lump/fines) mixed in with snow and transported during snow management activities, the following guidelines shall be followed by equipment operators:
 - Maintain a loader bucket/grader blade lift of two (2) inches when clearing snow.
 - Exercise caution when clearing snow around the base of stockpiles, making sure not to remove ore at the toe of ore stockpiles.
 - Exercise caution when removing snow/drifts near the face of ore stockpiles, making sure not to remove ore along the face of ore stockpiles.
 - When possible, select a loader that is best suited for the area where snow removal is required. For example, the use of a 950 loader is more suitable for stockpile faces whereas a 988 loader is better suited for removing snow from the pad floor. This may require equipment preplanning for availability.
- Implementation of the Ore Stockpile Pad Regrading Strategy to prevent the pooling of water on and around the Ore Stockpile Facility pad.
- The Shiploading Department is responsible for managing the snow stockpile locations for the Ore Stockpile Facility. The Shiploading Department will be notified if snow stockpile locations under their management are required to be used by other operational departments or by Projects due to excess snow accumulation in other areas of the Project.

If it was necessary to deposit snow at unapproved temporary snow stockpile locations following an extreme winter storm event to maintain site access and ensure health and safety, the Shiploading Department will endeavour to transport the snow from the temporary locations to the approved snow stockpile locations within a period of less than ten (10) days or before the melt starts to occur.

BIM-5200-PLA-0006 Snow Management Plan	Issue Date: 2024-03-31	Page 25 of 42
Site Wide	Next Review date: 2025-03-28	Revision: 7
Document Owner: Environmental Superintendent	Document Approver: General Manager	
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FIGURE 3: SNOW MANAGEMENT – MILNE PORT (SHEET 1 OF 2)

BIM-5200-PLA-0006 Snow Management Plan	Issue Date: 2024-03-31	Page 26 of 42
Site Wide	Next Review date: 2025-03-28	Revision: 7
Document Owner: Environmental Superintendent	Document Approver: General Manager	
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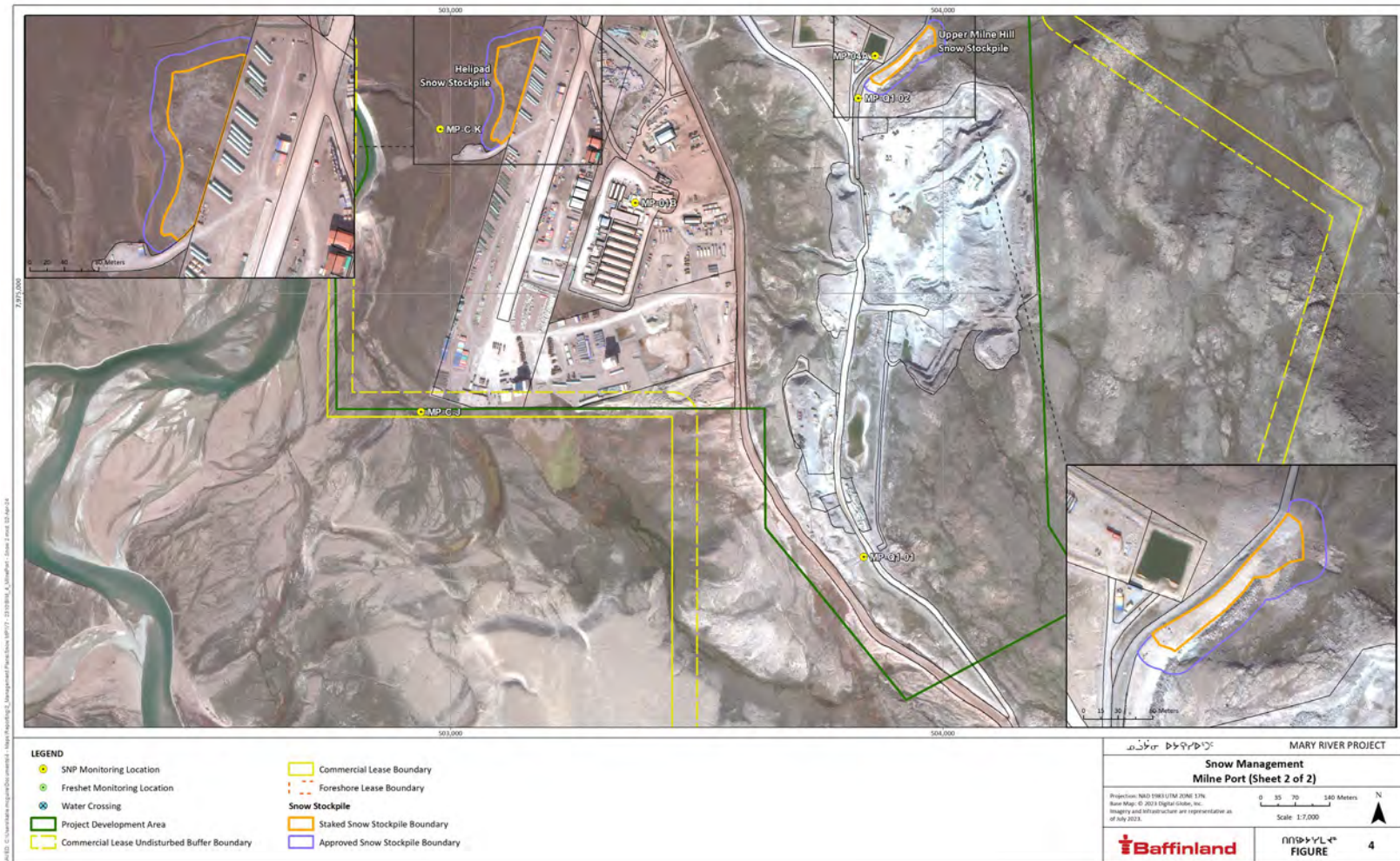


FIGURE 4: SNOW MANAGEMENT – MILNE PORT (SHEET 2 OF 2)

BIM-5200-PLA-0006 Snow Management Plan	Issue Date: 2024-03-31	Page 27 of 42
Site Wide	Next Review date: 2025-03-28	Revision: 7
Document Owner: Environmental Superintendent	Document Approver: General Manager	
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APPENDIX E QUARRY SNOW MANAGEMENT GUIDELINES – ROAD MAINTENANCE

BIM-5200-PLA-0006 Snow Management Plan	Issue Date: 2024-03-31	Page 28 of 42
Site Wide	Next Review date: 2025-03-28	Revision: 7
Document Owner: Environmental Superintendent	Document Approver: General Manager	
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Snow Management Guidelines for Quarries

To manage snow at the Milne Port and Mine Site quarry operations, the following guidelines will be followed by Road Maintenance to ensure compliance with the SMP:

- Snow will not be stockpiled within 31 meters of the ordinary High Water Mark of nearby water bodies (i.e. streams, lakes, and rivers).
- Snow shall be stockpiled at the approved locations identified in Figure 1 and Figure 2 for the Mine Site and in Figure 3 for Milne Port.
- To minimize the amount of debris collected and mixed with stockpiled snow, Project personnel shall remove debris from the area prior to snow removal. This may include measures such as avoiding heavily littered areas until the debris can be sufficiently removed.
- Following winter storm events, snow may be stockpiled at temporary locations within the quarry facilities until the snow can be transported to the approved stockpile locations identified in figures 1 through 3.
- Accumulated snow will be removed from the QMR2 quarry, and other quarry operations as required, prior to freshet to minimize runoff from snowmelt to down gradient water bodies/receptors.
- Road Maintenance will conduct routine monitoring of stockpiled snow to ensure that minimal amounts of aggregate and debris are being mixed in during snow management activities. Routine inspections of approved snow stockpiles will also be completed monthly (and weekly during freshet) using the Snow Stockpile Inspection Form (Appendix B) by the Environment Department.
- Exercise caution when clearing snow near ditches and berms, making sure not to alter existing infrastructure. Snow should not be plowed into ditches.
- To minimize the amount of aggregate collected and transported during snow management activities, the following guidelines shall be followed by equipment operators:
 - Maintain a loader bucket/grader blade lift of two (2) inches when clearing snow.
 - Exercise caution when clearing snow around the base of aggregate stockpiles, making sure not to remove aggregate at the toe of aggregate stockpiles.
 - Exercise caution when removing snow/drifts near the face of quarry material stockpiles, making sure not to remove material along the face of the stockpiles.
 - When possible, select a loader that is best suited for the area where snow removal is required. For example, the use of a 950 loader is more suitable for stockpile faces whereas a 988 loader is better suited for removing snow from the pad floor. This may require equipment preplanning for availability.

If it was necessary to deposit snow at unapproved temporary snow stockpile locations following an extreme winter storm event to maintain site access and ensure health and safety, Road Maintenance will endeavour to transport the snow from the temporary locations to the approved snow stockpile locations within a period of less than ten (10) days or before the melt starts to occur.

BIM-5200-PLA-0006 Snow Management Plan	Issue Date: 2024-03-31	Page 29 of 42
Site Wide	Next Review date: 2025-03-28	Revision: 7
Document Owner: Environmental Superintendent	Document Approver: General Manager	
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**APPENDIX F TOTE ROAD SNOW MANAGEMENT GUIDELINES – ROAD
MAINTENANCE**

BIM-5200-PLA-0006 Snow Management Plan	Issue Date: 2024-03-31	Page 30 of 42
Site Wide	Next Review date: 2025-03-28	Revision: 7
Document Owner: Environmental Superintendent	Document Approver: General Manager	
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Tote Road Snow Management Guidelines

To manage snow along the Tote Road, the following guidelines will be followed by Road Maintenance to ensure compliance with the SMP:

- Snow will be managed and stockpiled as outlined in figures 4 - 9.
- Snow will not be stockpiled within 31 meters of the ordinary High Water Mark of nearby water bodies (i.e. streams, lakes, and rivers).
- Where practical, snow should be removed or cleared in the same direction as the prevailing winds of the area and/or to the downhill side. This will minimize the amount of drifting that occurs across Tote Road infrastructure during winter months and reduce the amount of meltwater that contacts Tote Road infrastructure (i.e. roads, culverts) during freshet.
- When clearing snow, snow should be carried from one side of the road to the other and not split down the middle and pushed to both sides. This will reduce the amount of drifting that occurs across Tote Road infrastructure and the amount of equipment passes required to clear accumulated snow.
- When removing snow near culverts using a grader, rotate the moldboard to carry the snow past and away from culverts before moving snow to the edge of the road.
- When pushing snow away from the Tote Road, equipment operators should maintain a low, flat angle and take special care not to disturb the tundra underneath the snow and not deviate from the centre line of the Tote Road by more than 50 metres.
- Road Maintenance is responsible for managing the snow stockpile locations along the Tote Road. Road Maintenance will be notified if snow stockpile locations under their management are required to be used by other operational departments or by Projects due to excess snow accumulation in other areas of the Project.
- When using equipment to position snow that will be managed by trailing snow blowers, berm up snow in a manner that is accessible by snow blowers.
- Minimize snow buildup along shoulders of the Tote Road. For the safety of employees and wildlife, snow banks should not exceed 1 m in height.
- Prior to freshet, culverts and ditches must be cleared of snow to provide free flowing conditions for movement of water. This may require the application of steam to culverts.
- Road Maintenance will conduct routine monitoring of stockpiled snow to ensure minimal amounts of debris are being mixed in during snow management activities. Routine inspections of approved snow stockpiles will also be completed monthly (and weekly during freshet) using the Snow Stockpile Inspection Form (Appendix B) by the Environment Department.
- Road Maintenance will segregate and properly dispose of contaminated snow and/or debris from snow stockpiles on an ongoing basis as snow melts throughout the year and debris/contaminants surface.

If it was necessary to deposit snow at unapproved temporary snow stockpile locations following an extreme winter storm event to maintain site access and ensure health and safety, Road Maintenance will endeavour to transport the snow from the temporary locations to the approved snow stockpile locations within a period of less than ten (10) days or before the melt starts to occur.

BIM-5200-PLA-0006 Snow Management Plan	Issue Date: 2024-03-31	Page 31 of 42
Site Wide	Next Review date: 2025-03-28	Revision: 7
Document Owner: Environmental Superintendent	Document Approver: General Manager	
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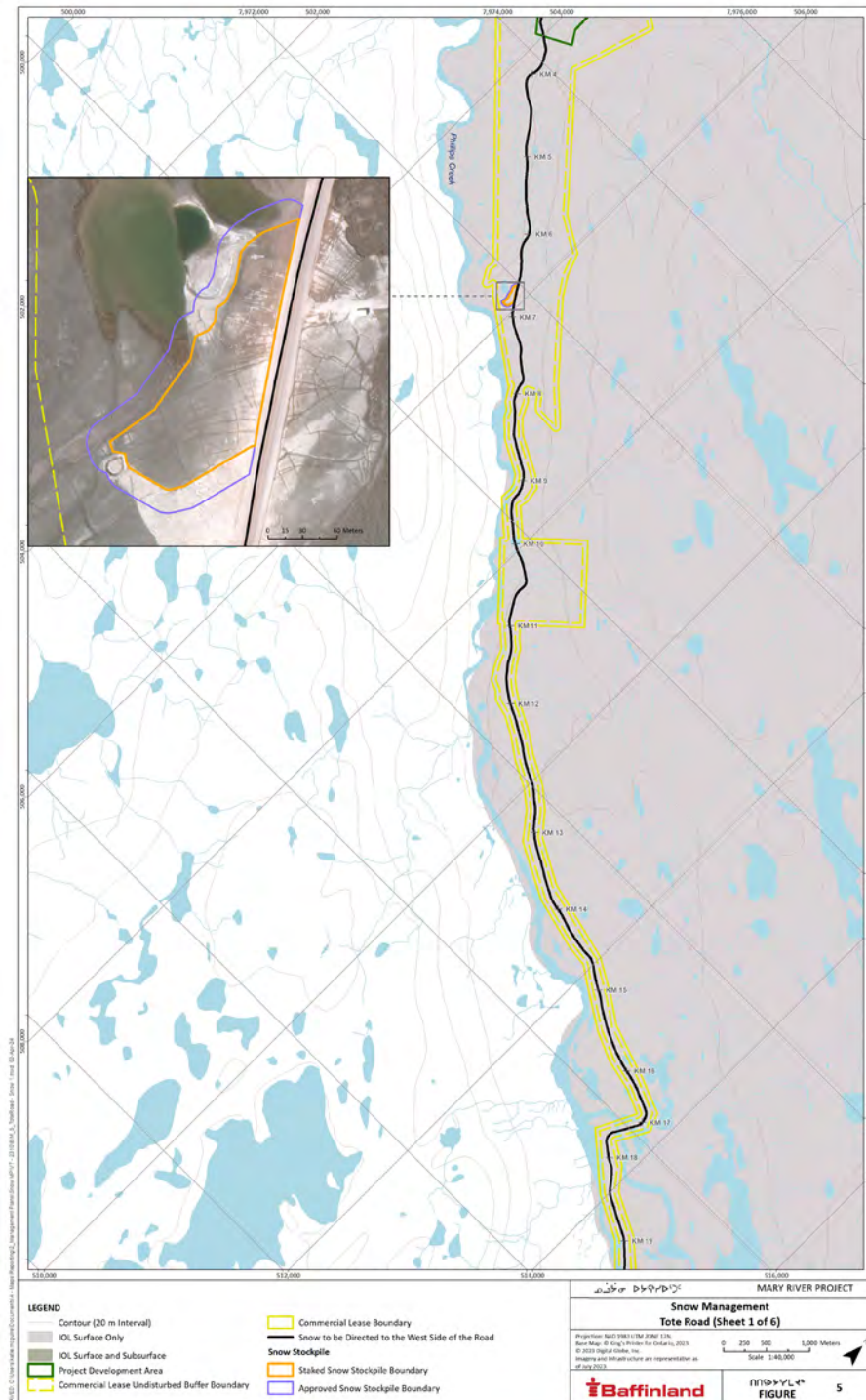


FIGURE 5: SNOW MANAGEMENT– TOTE ROAD (SHEET 1 OF 6)

BIM-5200-PLA-0006 Snow Management Plan	Issue Date: 2024-03-31	Page 32 of 42
Site Wide	Next Review date: 2025-03-28	Revision: 7
Document Owner: Environmental Superintendent	Document Approver: General Manager	
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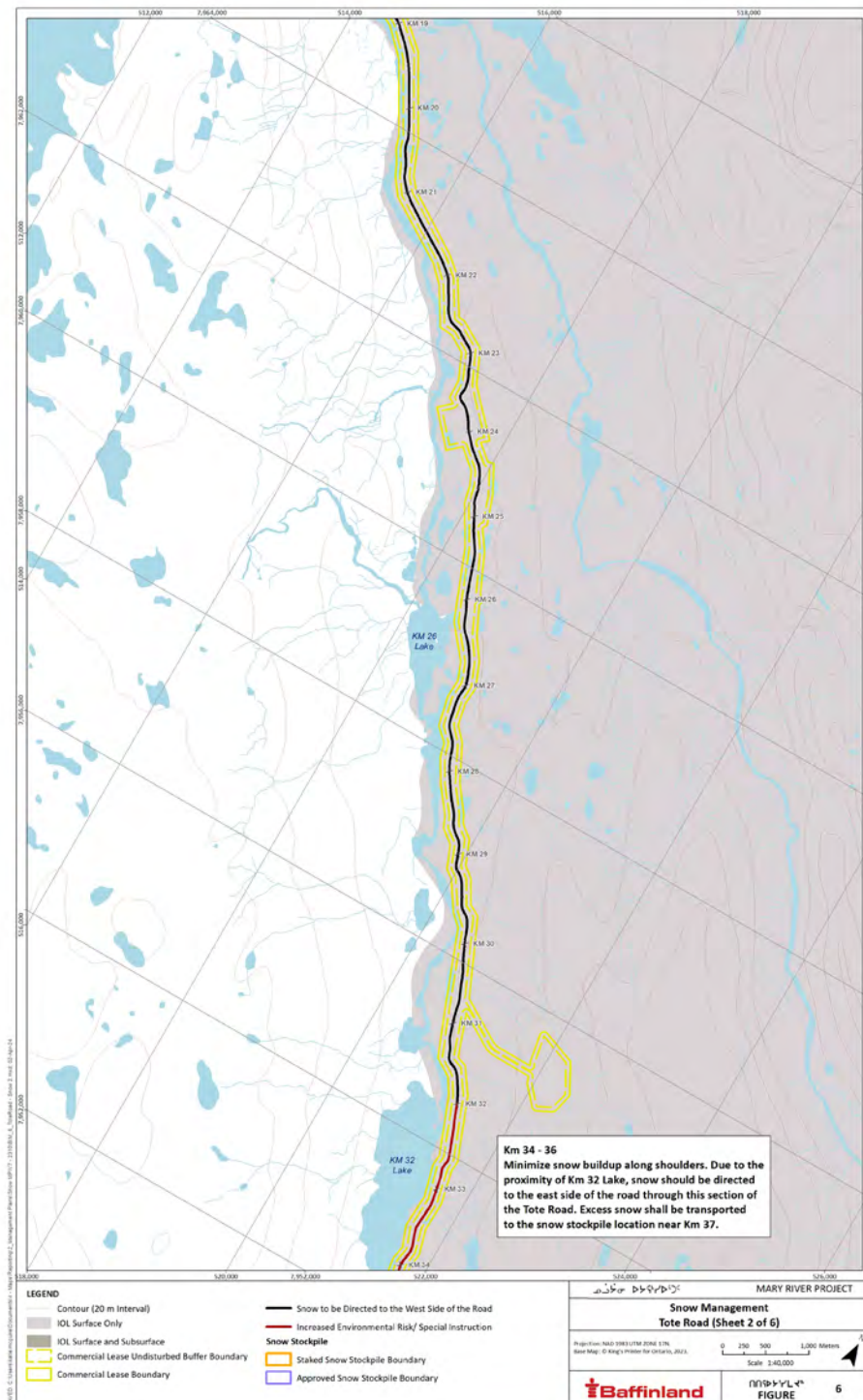


FIGURE 6: SNOW MANAGEMENT– TOTE ROAD (SHEET 2 OF 6)

BIM-5200-PLA-0006 Snow Management Plan	Issue Date: 2024-03-31	Page 33 of 42
Site Wide	Next Review date: 2025-03-28	Revision: 7
Document Owner: Environmental Superintendent	Document Approver: General Manager	
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FIGURE 7: SNOW MANAGEMENT– TOTE ROAD (SHEET 3 OF 6)

BIM-5200-PLA-0006 Snow Management Plan	Issue Date: 2024-03-31	Page 34 of 42
Site Wide	Next Review date: 2025-03-28	Revision: 7
Document Owner: Environmental Superintendent	Document Approver: General Manager	
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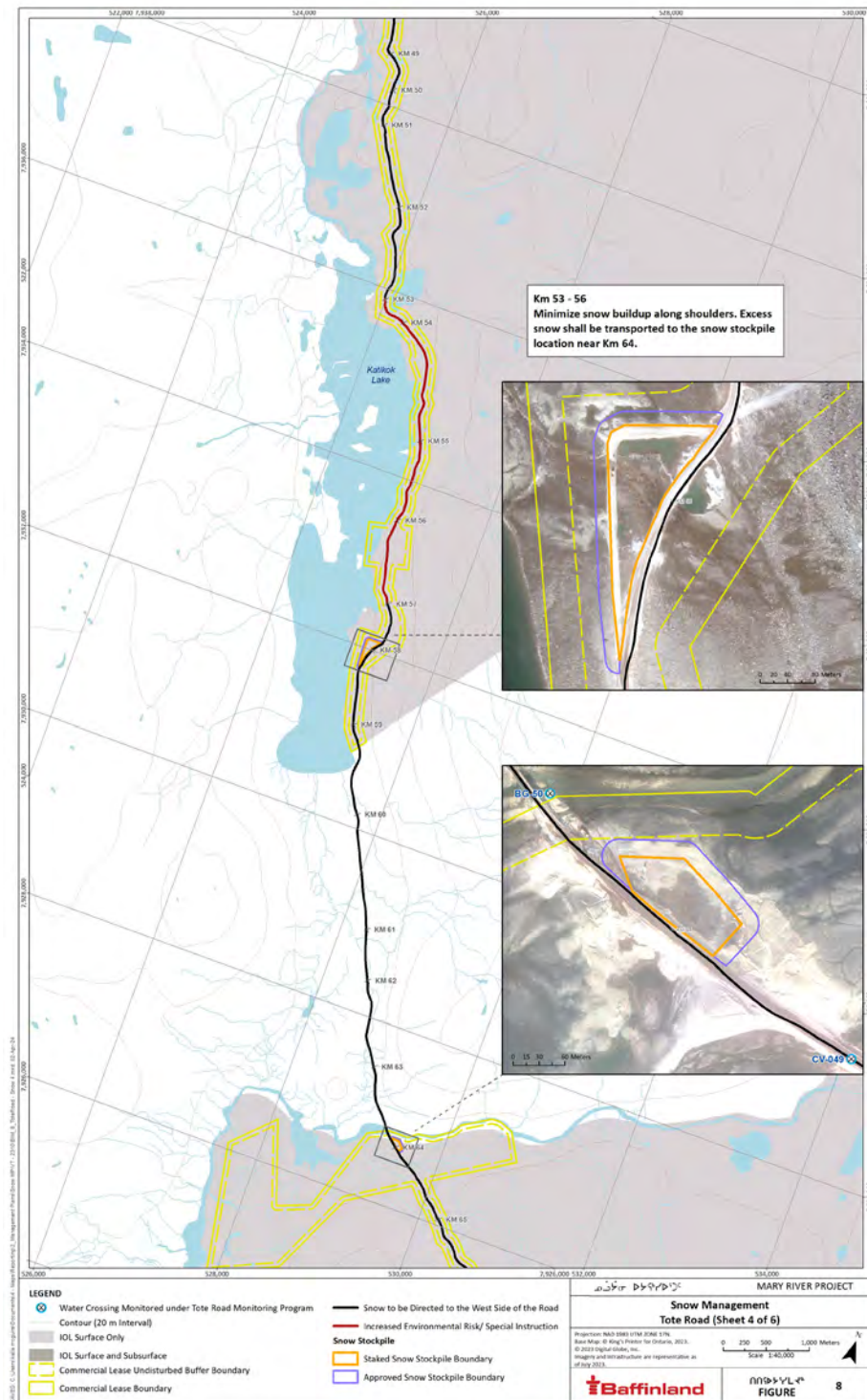


FIGURE 8: SNOW MANAGEMENT – TOTE ROAD (SHEET 4 OF 6)

BIM-5200-PLA-0006 Snow Management Plan	Issue Date: 2024-03-31	Page 35 of 42
Site Wide	Next Review date: 2025-03-28	Revision: 7
Document Owner: Environmental Superintendent	Document Approver: General Manager	
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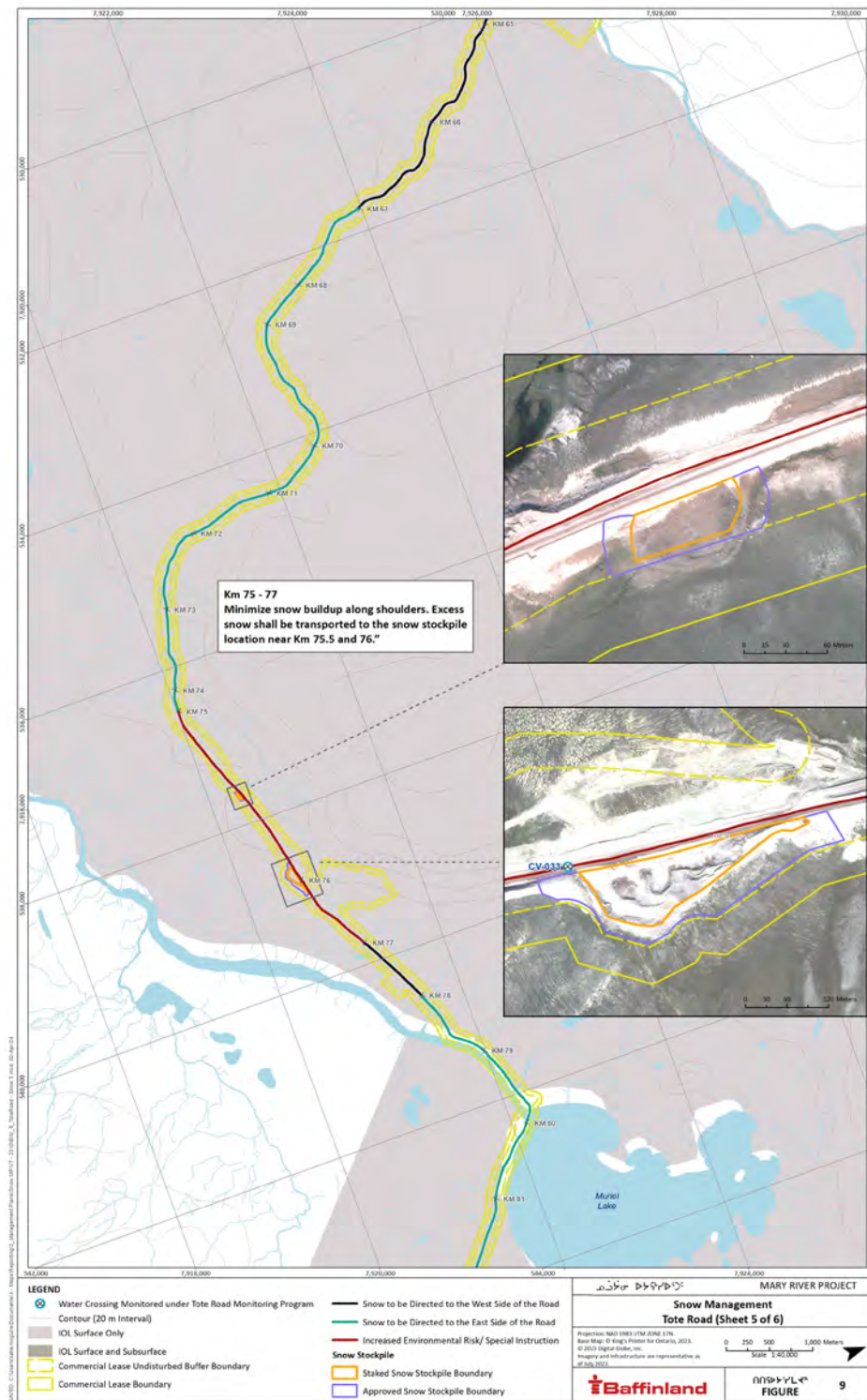


FIGURE 9: SNOW MANAGEMENT – TOTE ROAD (SHEET 5 OF 6)

BIM-5200-PLA-0006 Snow Management Plan	Issue Date: 2024-03-31	Page 36 of 42
Site Wide	Next Review date: 2025-03-28	Revision: 7
Document Owner: Environmental Superintendent	Document Approver: General Manager	
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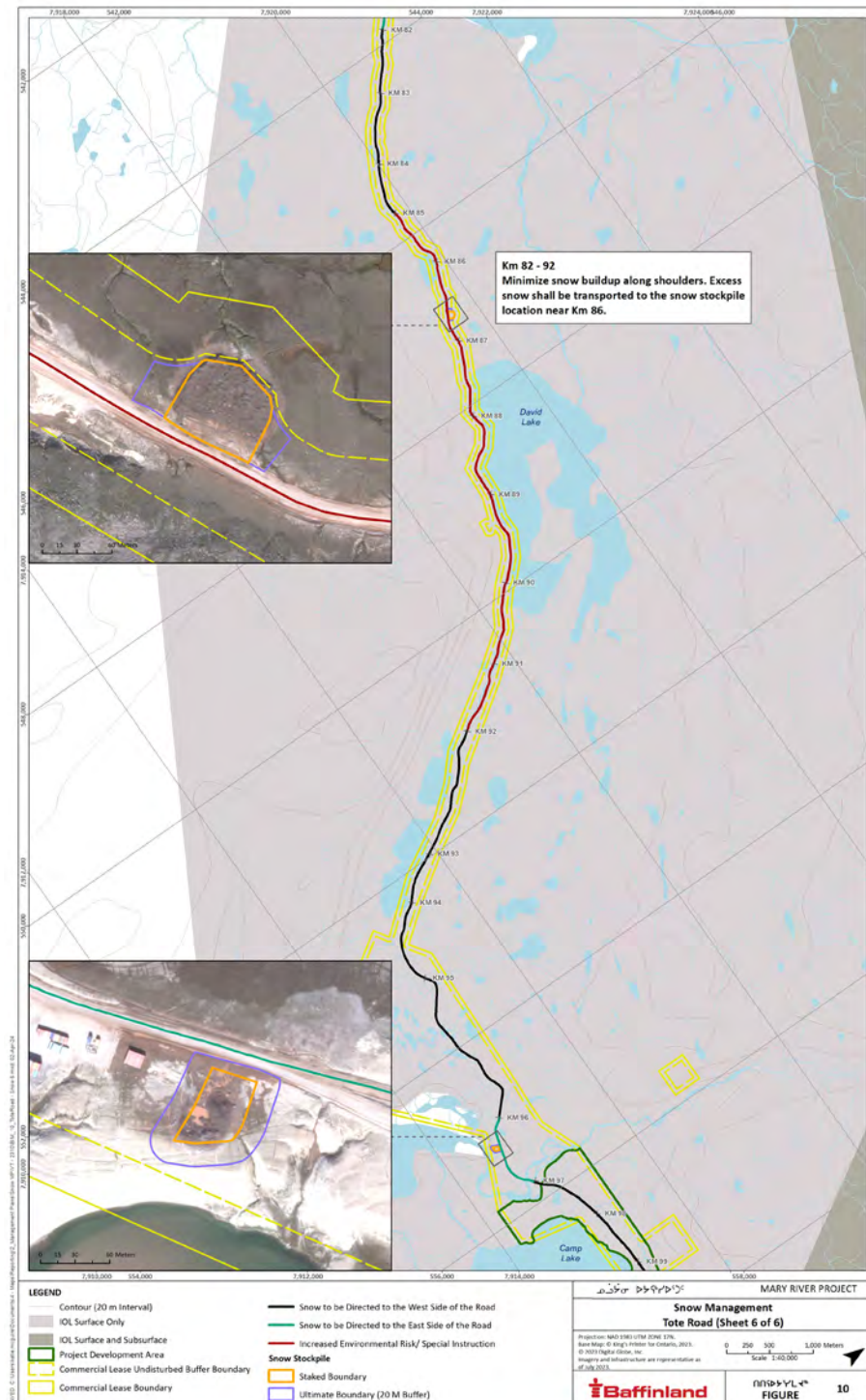


FIGURE 10: SNOW MANAGEMENT– TOTE ROAD (SHEET 6 OF 6)

BIM-5200-PLA-0006 Snow Management Plan	Issue Date: 2024-03-31	Page 37 of 42
Site Wide	Next Review date: 2025-03-28	Revision: 7
Document Owner: Environmental Superintendent	Document Approver: General Manager	
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APPENDIX G CRUSHING FACILITY SNOW MANAGEMENT GUIDELINES – CRUSHER DEPARTMENT

BIM-5200-PLA-0006 Snow Management Plan	Issue Date: 2024-03-31	Page 38 of 42
Site Wide	Next Review date: 2025-03-28	Revision: 7
Document Owner: Environmental Superintendent	Document Approver: General Manager	
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Mine Site Crusher Facility Snow Management Guidelines

To manage snow at the Mine Site Crusher Facility, the following guidelines will be followed by the Crusher Department to ensure compliance with the SMP:

- No ore or dust impacted snow shall leave the Crusher Facility.
- Snow shall not be stockpiled within three (3) metres of the Crusher Facility perimeter ditches.
- To minimize the amount of debris collected and mixed with stockpiled snow, Project personnel shall remove debris from the area prior to snow removal. This may include measures such as avoiding heavily littered areas until the debris can be sufficiently removed.
- The Crusher Department will conduct routine monitoring of stockpiled snow to ensure that minimal amounts of ore and debris are being mixed in during snow management activities. Routine inspections of approved snow stockpiles will also be completed monthly (and weekly during freshet) using the Snow Stockpile Inspection Form (Appendix B) by the Environment Department.
- To minimize the amount of ore (lump/fines) mixed in with snow and transported during snow management activities, the following guidelines shall be followed by equipment operators:
 - Maintain a loader bucket/grader blade lift of two (2) inches when clearing snow.
 - Exercise caution when clearing snow around the base of stockpiles, making sure not to remove ore at the toe of the ore stockpiles with the snow.
 - Exercise caution when removing snow/drifts near the face of ore stockpiles, making sure not to remove ore with the snow.
 - When possible, select a loader that is best suited for the area where snow removal is required. For example, the use of a 950 loader is more suitable for stockpile faces whereas a 988 loader is better suited for removing snow from the pad floor. This may require equipment preplanning for availability.
- The Crusher Department is responsible for managing the snow stockpile locations for the Crusher Facility. The Crusher Department will be notified if snow stockpile locations under their management are required to be used by other operational departments or by Projects due to excess snow accumulation in other areas of the Project.
- Prior to freshet, culverts and ditches must be cleared of snow to provide free flowing conditions for movement of water. This may require the application of steam to culverts.
- Implementation of the Ore Crusher Pad Regrading Strategy to prevent the pooling of water on and around the Crusher Facility pad.

If it was necessary to deposit snow at unapproved temporary snow stockpile locations following an extreme winter storm event to maintain site access and ensure health and safety, the Crusher Department will endeavour to transport the snow from the temporary locations to the approved snow stockpile locations within a period of less than ten (10) days or before the melt starts to occur.

BIM-5200-PLA-0006 Snow Management Plan	Issue Date: 2024-03-31	Page 39 of 42
Site Wide	Next Review date: 2025-03-28	Revision: 7
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APPENDIX H MINE HAUL ROAD AND DEPOSIT 1 SNOW MANAGEMENT GUIDELINES – MINE OPERATIONS

BIM-5200-PLA-0006 Snow Management Plan	Issue Date: 2024-03-31	Page 40 of 42
Site Wide	Next Review date: 2025-03-28	Revision: 7
Document Owner: Environmental Superintendent	Document Approver: General Manager	
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Mine Haul Road and Deposit 1 Snow Management Guidelines

To manage snow along the Mine Haul Road (MHR) and Deposit 1, the following guidelines will be followed by Mine Operations to ensure compliance with the SMP:

- Snow will be managed and stockpiled as shown in Figure 10.
- Snow will not be stockpiled within 31 meters of culverts on the MHR.
- Where practical, snow should be removed or cleared in the same direction as the prevailing winds of the area and/or to the downhill side. This will minimize the amount of drifting that occurs across Project infrastructure during winter months and reduce the amount of meltwater that comes in contact with Project infrastructure (i.e. roads and culverts) during freshet.
- When clearing snow, snow should be carried from one side of the road to the other and not split down the middle and pushed to both sides. This will reduce the amount of drifting that occurs across Project infrastructure and the amount of passes required by equipment to effectively clear snow accumulation.
- When removing snow near culverts using a grader, rotate the moldboard to carry the snow past and away from culverts before moving the snow to the edge of the road.
- When pushing snow away from Project infrastructure, equipment operators should maintain a low, flat angle and take special care not to disturb the tundra underneath the snow.
- Mine Operations is responsible for managing the snow stockpile locations along the MHR. Mine Operations will be notified if snow stockpile locations under their management are required to be used by other operational departments or by Projects due to excess snow accumulation in other areas of the Project.
- When using equipment to position snow to be managed by trailing snow blowers, berm up snow in a manner that is accessible by snow blowers.
- Prior to freshet, culverts and ditches must be cleared of snow to provide free flowing conditions for movement of water. This may require the application of steam to culverts.

If it was necessary to deposit snow at unapproved temporary snow stockpile locations following an extreme winter storm event to maintain site access and ensure health and safety, Mine Operations will endeavour to transport the snow from the temporary locations to the approved snow stockpile locations within a period of less than ten (10) days or before the melt starts to occur.

BIM-5200-PLA-0006 Snow Management Plan	Issue Date: 2024-03-31	Page 41 of 42
Site Wide	Next Review date: 2025-03-28	Revision: 7
Document Owner: Environmental Superintendent	Document Approver: General Manager	
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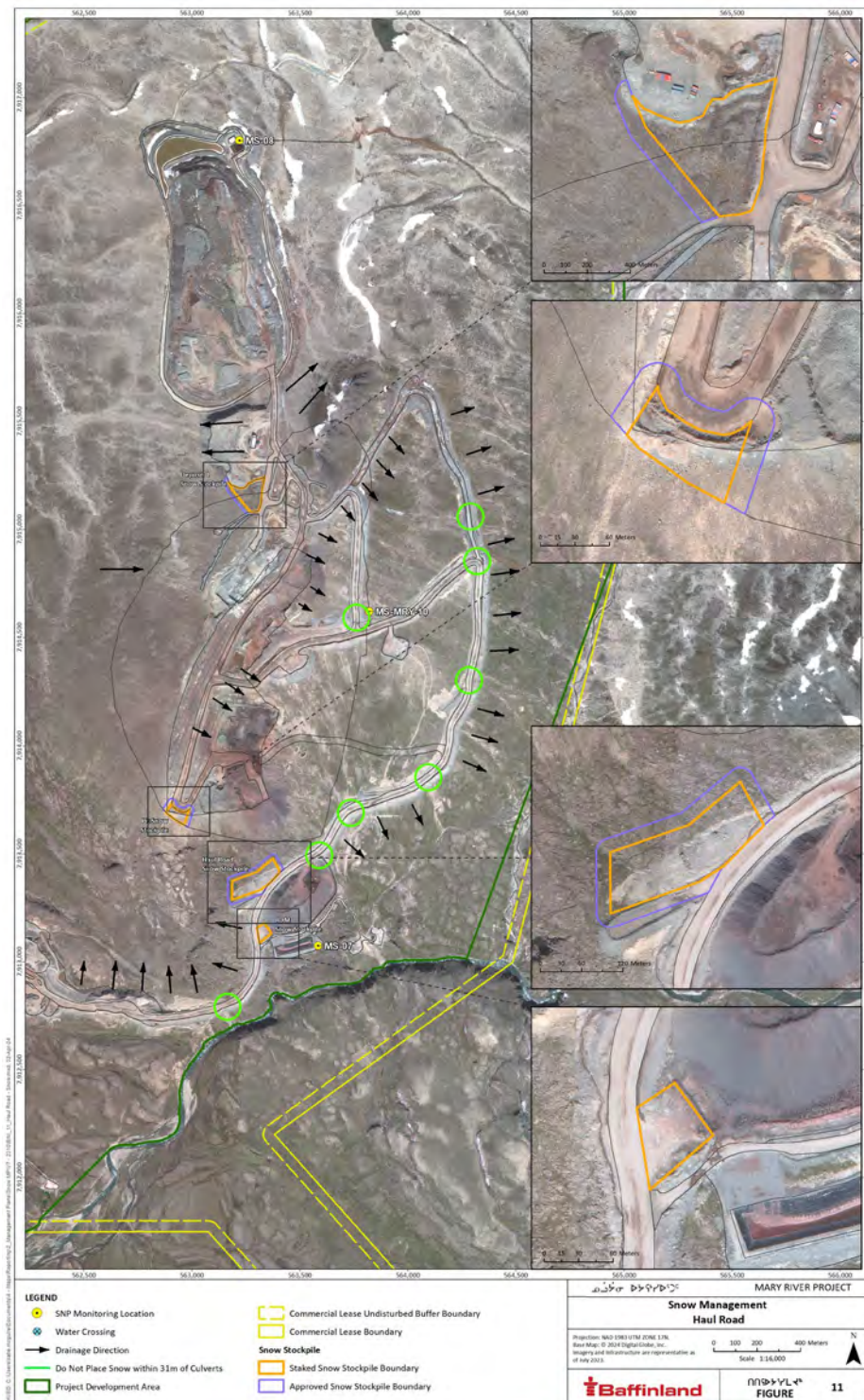


FIGURE 11: SNOW MANAGEMENT - HAUL ROAD AND DEPOSIT NO. 1

BIM-5200-PLA-0006 Snow Management Plan	Issue Date: 2024-03-31	Page 42 of 42
Site Wide	Next Review date: 2025-03-28	Revision: 7
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