Interim Closure and Reclamation Plan

Ulu Gold Project

(including Hood River, Roma and other licensed projects)

Kitikmeot Region, Nunavut

NOVEMBER 2025

BLUE STAR GOLD CORP.

SUMMARY

This *Interim Closure and Reclamation Plan* (the Plan) describes what has been completed since the initial approved plan dated March 2020 and describes what will be done to conduct progressive reclamation, seasonal closure, future final closure, and post-closure activities at the Ulu Gold Project ("Ulu"), near Kugluktuk, Nunavut. This Plan also describes clean-up work associated with Blue Star's exploration activities in the area including drilling and seasonal camp operation.

Previous owners of the Ulu Gold Project intended to mine and transport the ore to the Lupin mill or to a potential mill at High Lake. Underground workings were developed; a bulk sample was brought to surface for testing and waste rock was used to construct infrastructure pads and material laydown areas. Much of the equipment and infrastructure mobilized to site in 1996 is no longer useful, and there has been some contamination of the disturbed areas.

When Blue Star acquired Ulu, the site was in care and maintenance and undergoing some site clean-up. Blue Star has restarted exploration and has been and is currently remediating the site during its exploration programs with the objective of re-establishing the site as an exploration camp with the future optionality to move towards development in the future should that opportunity arise.

Substantial changes of key elements of the interim reclamation plan:

- Contaminated soils initial estimate ~6,000 m^3; current estimate ~1,200 m^3; requires less than 50% of the designed soil treatment facility. Currently using the old, lined tank farm as a holding area regularly aerating the soils with positive results.
- Landfill materials remaining ~250 m^3 and final cover of ~3,150 m^3 of coarse esker.
- ML/ARD or PAG rock identified as Priority 1, Priority 2 and other; created an interim pile (~5,000 m^3) of potential PAG rock and PAG rock from Camp 3 Road, Culvert Six and from clearing rock from the West Lake drainage; not all rock in the pile is considered at risk for ML/ARD.

Blue Star is requesting a reduction in security from $2.629 million to $1.709 million.

REVISION HISTORY

Revision #	Date	Section	Summary of Changes	Author	Approver
2BM-ULU2030, 2BE-HRP1932					
4	2025	All Sections	Revision of all sections and tables to include activities and findings the previously approved version. Includes updates to proposed timelines, equipment status, associated work and costing. Appendix A is now Geochemical Guidance Report Appendix B is Contaminated soils memo Appendix C is the draft Landfill report Appendix D is the updated cost estimate	Blue Star SRK Consulting (Appendix A, C, D)	Blue Star
3	2024	Summary Revisions History	Adjusted footer Minor formatting and non-technical edits	Blue Star	Blue Star
		All Sections	Revision of all sections to include activities and findings from previous version. Includes updates to proposed timelines, associated work and costing.	Blue Star	Blue Star
		Table 2	Updated to include work to date, current status and expected future activities	Blue Star	Blue Star
		Appendix A	Updated with most current geochemical monitoring document	Blue Star	Blue Star
		Appendix B	Updated with most current soil characterization report	KEL	Blue Star

		Appendix C	Updated reclamation cost estimate; inflation adjustment	D.Godley, SRK	Blue Star
2	Mar 2021	Summary Revision History Sections 1.0, 1.1, 1.2, 2.3.1, 4.2.4, 12 Table 1	Amalgamated existing approved Hood River Abandonment and Restoral Plan with the existing Ulu Interim Closure and Reclamation Plan into 1 document for operational efficiency as all activities will be centralized and based out of Ulu. Changes throughout to reflect name of project, related activities and authorizations. Content provided is consistent with existing approved plans.	S. Hamm	D. Lindsay
		Sections 1.4, 6.2, 6.3, 6.5, 9.1 Tables 2, 9	Replaced calendar year (ie. 2020, 2021) with program year (Year 1, Year 2)		
		Section 4.2	Updated contact info.		
		Throughout	Minor non-technical edits and formatting for readability and consistency with other Blue Star management plans		
2BE-HRP1924					
1	Apr 2019	Abandonment and Restoration Plan	Approved July 15, 2019	Blue Star Gold Corp.	
2BE-HRP1419					
2	Sep 2015	Abandonment and Restoration Plan	Approved March 7, 2016	WPC Resources Inc.	
1	May 2014	Abandonment and Restoration Plan	-	WPC Resources Inc.	
2BM-ULU2030					
1	Mar 2020	Interim Closure and Reclamation Plan	Approved May 15, 2020	Blue Star Gold Corp.	
2BM-ULU1520					
4	Mar 2018	Progressive Reclamation Plan	-	Bonito Capital Corp.	
3	Sep 2017	Progressive Reclamation Plan	-	Bonito Capital Corp.	
2	Mar 2016	Interim Closure and Reclamation Plan	-	Bonito Capital Corp.	

1	Mar 2013	Interim Closure and Reclamation Plan	Approved May 13, 2015	Bonito Capital Corp.
2BM-ULU0914				
2	May 2014	Care and Maintenance Plan	-	Bonito Capital Corp.
1b	Aug 2011	Interim Abandonment and Restoration Plan	-	Elgin Mining Inc.
1a	Aug 2011	Care and Maintenance Plan	-	Elgin Mining Inc.
NWB1ULU0008/2BM-ULU0008				
4	Nov 2007	Abandonment and Restoration Plan	-	Zinifex Canada Inc.
3	Jan 2004	Interim Abandonment and Restoration Plan	Approved October 16, 2006	Wolfden Resources Inc.
2	Apr 2001	Interim Abandonment and Restoration Plan	Approved January 7, 2004	Echo Bay Mines
1	Aug 1998	Interim Abandonment and Restoration Plan	-	Echo Bay Mines

TERMS AND ABBREVIATIONS

Abbreviation	Term
°C	Degrees Celsius
F1	Petroleum Hydrocarbon fraction F1 encompasses the equivalent normal straight-chain hydrocarbon boiling point rangeC6 to C10
F2	Petroleum Hydrocarbon fraction F2 encompasses the equivalent normal straight-chain hydrocarbon boiling point range >C10toC16
F3	Petroleum Hydrocarbon fraction F1 encompasses the equivalent normal straight-chain hydrocarbon boiling point range >C16toC34
F4	Petroleum Hydrocarbon fraction F1 encompasses the equivalent normal straight-chain hydrocarbon boiling point range >C34 to C50+
FCP	Final Closure Plan
ICRP	Interim Closure and Reclamation Plan
IOL	Inuit Owned Land
KIA	Kitikmeot Inuit Association
ML/ARD	Metal leaching and acid rock drainage
NIRB	Nunavut Impact Review Board
NPC	Nunavut Planning Commission
NWB	Nunavut Water Board
PAG	Potentially Acid Generating
PHC	Petroleum Hydrocarbon
STF	Soil treatment facility

CONCORDANCE TABLE: ULU PROGRESSIVE RECLAMATION COST ESTIMATE

Interim Closure and Reclamation Plan				Closure Cost Estimate				Reference Documents
	Task	Subtask Section No.	Subtask	Section No.	Section	Subtask No.	Subsection	
	Progressive Reclamation Measures	6.3	Mine Workings	1	Direct Costs	1.5	Mine Workings	-
		6.4	Mine Sump	1	Direct Costs	1.4	Ore Management	-
		6.5	Ore and Waste Rock	1	Direct Costs	1.4	Ore Management	Appendix A: Ulu ML-ARD 2024 Monitoring Report, Ulu, Nunavut. Prepared by SRK Consulting for Blue Star Gold Corp. March 19, 2025
		6.5	Ore and Waste Rock	2	Indirect Costs	2.2	ML/ARD Investigation	Appendix A: Ulu ML-ARD 2024 Monitoring Report, Ulu, Nunavut. Prepared by SRK Consulting for Blue Star Gold Corp. March 19, 2025
		6.6	Infrastructure and Equipment	1	Direct Costs	1.1. & 1.2	Building Demolition Non-Hazardous Landfill	*Landfill Management Plan*
		6.7	Hazardous Materials and Contaminated Soil	1	Direct Costs	1.6	Hazardous Material Management	Appendix B: 2024 Limited Phase II Environmental Site Assessment Ulu Gold Mine Project. Prepared by KBL Environmental Ltd. for Blue Star Gold Corp. September 20, 2024
		6.7	Hazardous Materials and Contaminated Soil	1	Direct Costs	1.3	Soil Treatment Facility	*Soil Treatment Facility Management Plan*
		6.8	Borrow and Quarry Materials	1	Direct Costs	1.7	Borrow and Quarry	*Borrow Pits and Quarry Management Plan*
		6.9	Monitoring and Maintenance	2	Indirect Costs	2.3 & 2.4 & 2.9	Monitoring and Reporting Management and QA/QC Contingencies	Water License 2BM-ULU2030 *Landfill Management Plan* *Soil Treatment Facility Management Plan*

TABLE OF CONTENTS

LIST OF TABLES

LIST OF FIGURES

LIST OF APPENDICES

1.0 INTRODUCTION

Blue Star Gold Corp. ("Blue Star") is undertaking exploration activities and conducting progressive reclamation in the Kitikmeot Region of Nunavut on the Ulu Gold Project ("Ulu"), which now includes both the previously known Ulu Gold Project and the Hood River Gold Project. Blue Star also conducts regional exploration on the Roma Project ("Roma"); activities are based out of the Ulu camp and undertaken in the local area (the "Project").

Blue Star's near-term plans are to undertake mineral exploration locally and regionally and to undertake progressive reclamation of the Ulu site. This revised *Interim Closure and Reclamation Plan* ("ICRP"; the "Plan") is intended exclusively for use by Blue Star and its contractors. Its purpose is to ensure that best practices to minimize potential environmental impacts and liabilities during progressive reclamation and exploration activities are implemented, and to ensure that the conditions of the water and land use licences are met in all work areas, including camps, fuel caches, airstrip, reclamation work area, quarries and drill sites. The ICRP should be read in conjunction with the documents listed in Table 1, which may be updated from time to time.

Blue Star and its wholly owned subsidiaries, Ulu Mining Inc. ("Ulu Mining") and Inukshuk Exploration Inc. ("Inukshuk") hold all Project authorizations. For the purposes of this document and other Project-related documents, Blue Star, Ulu Mining and Inukshuk may be used interchangeably. In 2019, Blue Star changed its name; it was previously known as WPC Resources Inc.

Table 1. Related project documents, permits and licenses.

Document	Authors
Landfill Management Plan	Blue Star Gold Corp.
Soil Treatment Facility Management Plan	Blue Star Gold Corp.
Engagement Plan	Blue Star Gold Corp.
Spill Response Plan	Blue Star Gold Corp.
Waste Management Plan	Blue Star Gold Corp.
Borrow Pits and Quarry Management Plan	Blue Star Gold Corp.
Wildlife Protection Plan	Environmental Dynamics Inc.
Interim Water Management Plan	Gartner Lee Ltd.
Mining lease, mineral claims	Government of Canada
Mineral Exploration Agreement	Nunavut Tunngavik Incorporated
Screening Decision Reports	Nunavut Impact Review Board
Water Licenses	Nunavut Water Board
Land Use License	Kitikmeot Inuit Association
Advanced Exploration Lease	Kitikmeot Inuit Association

1.1 OVERVIEW

The Ulu site is located in the Kitikmeot region of Nunavut, approximately 200 km southeast of Kugluktuk, Nunavut (see Figure 1). Underground works and exploration at Ulu were conducted in 1996, 1997, 2005, and 2006. Since 2006, the Ulu camp has been reopened to support surface exploration and progressive reclamation activities in 2012, 2014, and annually since 2018. Blue Star acquired the Ulu Project from

Bonito Capital Corp. and the water licence was assigned December 2019. Blue Star is now responsible for activities associated with the Project, including the implementation of this Plan.

The Hood River area has been explored intermittently since 1960. The mineral tenure is currently held by Inukshuk, under a mineral exploration agreement with Nunavut Tunngavik Incorporated ("NTI"), and is contiguous with the Ulu mining lease. Initially as WPC Resources Inc., Blue Star commenced exploration at Hood River in 2014 and subsequently established a temporary seasonal camp in 2019. The Hood River temporary camp was reclaimed during the 2021 season and all subsequent work has been undertaken from the Ulu camp.

Ongoing exploration activities local to Ulu and Hood River, as well as those occurring throughout the region, such as Blue Star's Roma project (mineral claims and mineral exploration agreement with NTI acquired in 2021, 2023), will be based out of the Ulu camp and may involve temporary and seasonal satellite camp(s) and fuel cache establishment in accordance with requisite licence terms and conditions.

1.2 SCOPE

This ICRP provides details of Blue Star's current plan to continue exploration activities while concurrently progressively reclaiming the site to support exploration activities yet also allowing for potential future mine development. The Plan predominantly describes the procedures for progressive reclamation and temporary closure of Ulu, and outlines considerations for future final closure at Ulu. Additional measures pertaining to seasonal temporary and final closure of additional exploration related facilities (Hood River and Roma) is also addressed. Unless otherwise specified, the majority of this plan applies specifically to the Ulu site; aspects pertaining to Hood River, Roma and other regional activities are specifically addressed in Section 12.0.

1.3 OBJECTIVES

Blue Star's team endeavours to fulfill its reclamation and closure objectives for the Project. Accordingly, the objectives of this plan are to:

- Ensure employees and contractors are aware of their responsibilities regarding progressive reclamation, temporary closure of the site, and associated monitoring activities.
- Outline appropriate measures to remediate areas affected by petroleum hydrocarbons and to treat the contaminated materials.
- Outline appropriate measures to manage, in the near term and longer term, potential metal leaching and acid generating materials.
- Outline appropriate measures to dispose of infrastructure no longer necessary for ongoing exploration at the site.
- Outline potential scenarios and studies required for future final closure of the site.

1.4 PROJECT SCHEDULE

The Project currently is a surface exploration site with historical underground workings. Table 2 outlines the revised Project schedule as currently envisioned by Blue Star. Table 3 outlines the changes between the 2020 Project Schedule and the current Project schedule. Exploration activities are expected to continue in the near term and a potential camp relocation may be deferred until a potential future development path is identified, both are contingent upon a variety of factors that include safety, logistics, conditions on site, exploration success, and market conditions.

Table 2. Project Schedule.

Year	Summary Main Project Activities
1[1]	Continue surface exploration. Complete potentially contaminated soils sampling below the current PHC soil holding area (old Ulu Tank Farm). Deposition of final lift of non-hazardous waste in land fill. Stage materials identified for disposal via proposed Grays Bay Road and monitor. Close the landfill at the end of each season. Consider stockpiled ore as PAG rock and manage accordingly. Develop interim storage pile for PAG/AG rock on ore pad. Develop long term waste rock (PAG rock) management plan. Conduct monitoring in accordance with water and land use licenses terms and conditions.
2	Continue surface exploration. Evaluate select portions of the Flood deposit for potential open pit mining approach. Construct a soil treatment facility. Excavate and treat petroleum hydrocarbon contaminated soils. Treatment of contaminated soil in the soil treatment facility. Monitor staged materials for disposal; monitor proposed Grays Bay Road progress. Use of remediated contaminated soils according to re-use criteria in Landfill or PAG rock interim storage pile. Close the landfill at the end of each season. Seek approval and implement long term waste rock (PAG rock) management plan. Complete reclamation research to evaluate requirements and options for future final closure of site roads, constructed pads, and historical mine openings. Conduct monitoring in accordance with water and land use licenses terms and conditions
3	Continue surface exploration. Continue potential open pit evaluation. Monitor staged materials for disposal; monitor proposed Grays Bay Road progress. Continuing treatment of contaminated soil in the soil treatment facility. Use of remediated contaminated soils according to re-use criteria in Landfill or PAG rock interim storage pile. Commence limited baseline environmental studies. Conduct monitoring in accordance with water and land use licenses terms and conditions.
4 - 6	Continue exploration. Complete potential open pit evaluation. Continue treatment of contaminated soil in the soil treatment facility. Close the soil treatment facility. Monitor staged materials for disposal; monitor proposed Grays Bay road progress. Dispose of remaining non-hazardous waste in the landfill (i.e., soil treatment facility liner). Close the landfill. Place final cover on the landfill. Continuing baseline environmental studies. Water license renewal. Conduct monitoring in accordance with water and land use licenses terms and conditions. Relocate the Ulu camp to a new location closer to the airstrip.
7 onwards	Monitor staged materials for disposal; monitor proposed Grays Bay Road progress. Continue exploration. Continuing baseline environmental studies. Conduct monitoring in accordance with water and land use licenses terms and conditions.

[1]Year 1 generally corresponds with this revision, once approved.

Table 3. Changes in Project Schedule 2020-2024.

Year	Summary of 2020 ICRP Project Activities	As of Sept 2025
1 (2020)	Recommence surface exploration. Construct a soil treatment facility. Excavate and treat petroleum hydrocarbon contaminated soils. Establish an on-site landfill for the disposal of non-hazardous materials. Implement selected management option for the stockpiled ore. Assess alternate camp locations. Close the landfill at the end of each season. Initiate reclamation research to evaluate requirements and options for future final closure of site roads, constructed pads, and historical mine openings. Conduct monitoring in accordance with water and land use licenses terms and conditions.	Exploration – recommenced Soil Treatment Facility ("STF") not created; pad for the STF partially created on ore pad. Hydrocarbon contaminated soils identified in 2019 were stored in the old bulk tank berm ("soil holding area"). Ore from the ore pad was moved near the mine retention pond and partially placed in the retention pond. Monitoring for compliance undertaken according to license terms and conditions.
2 (2021)	Continue surface exploration. Continue treatment of contaminated soil in the soil treatment facility. Close the landfill at the end of each season. Relocate the Ulu camp to a new location closer to the airstrip. Commence limited baseline environmental studies. Conduct monitoring in accordance with water and land use licenses terms and conditions	Surface exploration continued. Soil Treatment Facility not created; contaminated soil piles evaluated by KEL. Landfill (non-hazardous) established. No baseline environmental studies were initiated. New potential camp locations reviewed. Conduct monitoring in accordance with water and land use licenses continued. Research into ML/ARD options initiated.
3-6 (2022, 2023, 2024, 2025)	Continue surface exploration. Commence underground exploration. Undertake mine development planning. Continue treatment of contaminated soil in the soil treatment facility. Conduct monitoring in accordance with water and land use licenses terms and conditions.	Surface exploration continued. No underground exploration commenced. No mine development planning commenced. Added section to landfill and filled voids with subsurface reuse soils from soil storage area; covered with clean esker. Organized usable and non-usable equipment on the site. No STF built, however stored soils have been aerated each year with an excavator and sampled by KEL. No baseline environmental studies were initiated. Ore pad PAG pulled back, piled, covered including limestone (West Lake drainage). Research into ML/ARD options continued and became a priority over other reclamation activities. Conduct monitoring in accordance with water and land use licenses continued.
7 Onwards	Continue exploration. Continue baseline environmental studies. Conduct monitoring in accordance with water and land use licenses terms and conditions.	Planned: Ore pad PAG pullback, pile, cover including limestone (East Lake drainage). Priority 2

		Finalize long term PAG rock management plan. Move PHC pad soils into holding area, aerate and sample. Continue surface exploration Evaluate potential mine development Continue treatment of contaminated soil in the soil treatment facility. Commence limited baseline environmental studies. Conduct monitoring in accordance with water and land use licenses terms and conditions.

1.5 PLAN MANAGEMENT

The Plan is reviewed annually by Blue Star's Project Manager and is updated as needed following receipt of or amendments to licenses and permits, to ensure alignment with relevant terms and conditions. When material changes occur, the updated document will be provided to parties in accordance with the *Engagement Plan*.

1.6 PLAN IMPLEMENTATION

This Plan is effective upon approval and is valid throughout all phases of the Project. The Project Manager or their designate is responsible for Plan implementation. A copy of this Plan is posted in key locations at the site while the camp is open. All employees and contractors conducting progressive reclamation and monitoring activities will be made aware of its contents.

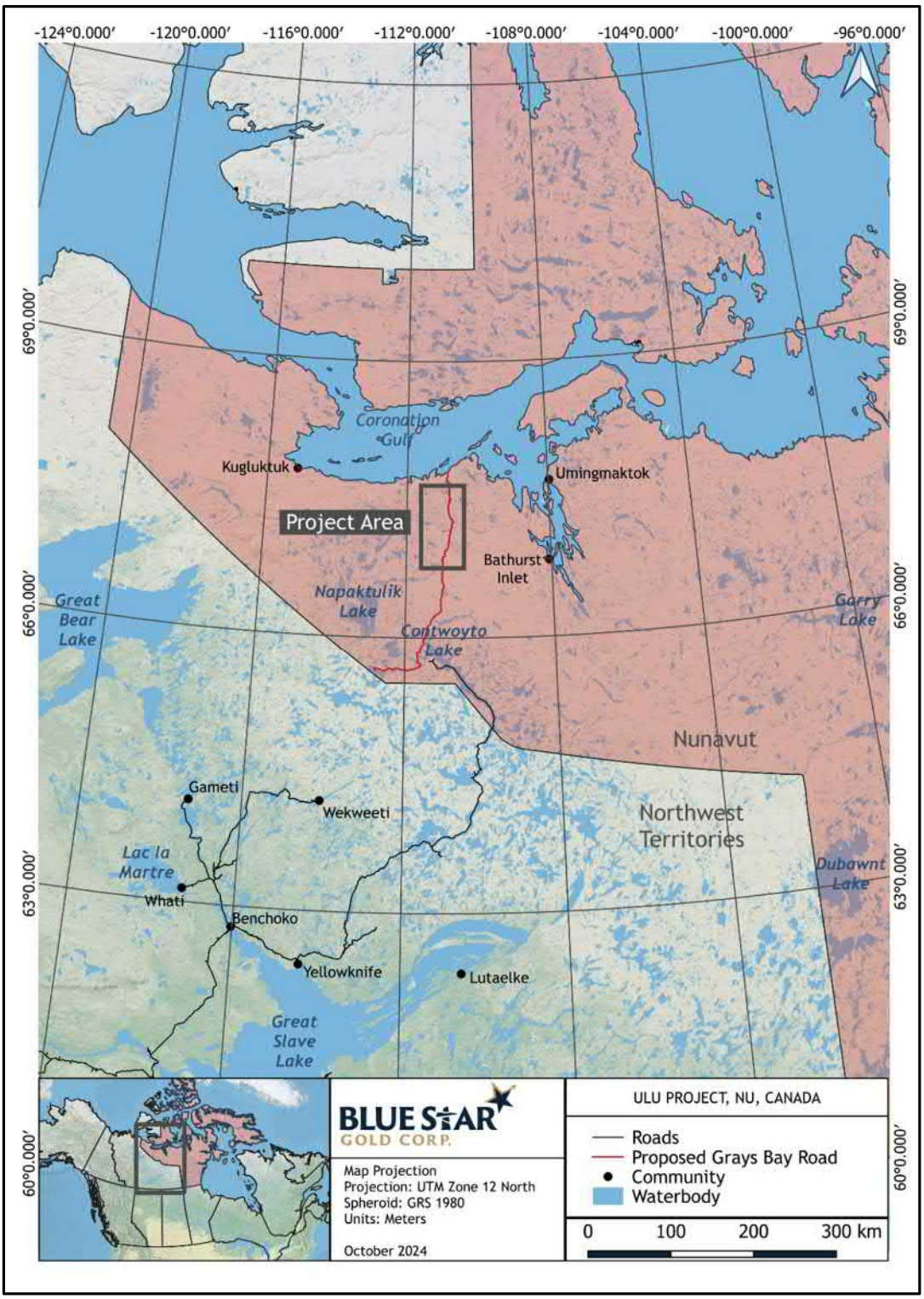


Figure 1. Ulu Gold Project site location map.

2.0 SITE DESCRIPTION

2.1 LOCATION AND ACCESS

The Project is located in the Kitikmeot region of Nunavut, approximately 523 km north–northeast of Yellowknife, Northwest Territories, approximately 45 km north of the Arctic Circle, and 126 km north of Lupin mine. The Project is centred at Ulu, at longitude 110°58'24 "W and latitude 66°54 '27"N. The closest population centres are Kugluktuk, approximately 200 km to the northwest, and Cambridge Bay, approximately 340 km to the northeast. The proposed deep-water port at Grays Bay is located 100 km to the north.

The Project is accessible by aircraft. A 3.5 km gravel road connects the 1,300 m by 32 m gravel airstrip to the Project. Float- and ski-equipped aircraft may also land on adjacent lakes. A winter road was constructed from the Lupin mine to the site to transport equipment and may be re-established as a winter trail in the future. The proposed route corridor for the all-weather Grays Bay Road passes in close proximity to the Project. Figure 2 illustrates the location of the overland routes.

2.2 PAST DEVELOPMENT ACTIVITIES

The original Ulu claim was staked in 1988 by BHP Minerals Canada Ltd. ("BHP") and the current Ulu mining lease corresponds to the original claim. The Flood Zone was discovered in 1989 and environmental baseline studies commenced in 1990.

Echo Bay Mines Ltd. ("Echo Bay") purchased the Ulu project from BHP in 1995 with the intent of developing it to provide mill feed to the Lupin mine. In 1996, Echo Bay mobilized surface and underground equipment and supplies with low-ground pressure, Nodwell and Commander, vehicles to a temporary camp, Camp 3 (Figure 3). In 1996, Echo Bay collared a portal, developed a decline to access the Flood Zone, and completed construction of the Ulu camp (Figure 4). Echo Bay suspended mining operations and surface exploration activities in 1997.

Kinross Gold Corp. ("Kinross") acquired the Ulu project in a business combination with Echo Bay in 2002. In 2003, Wolfden Resources Inc. ("Wolfden") acquired the Ulu mining lease from Kinross. The Ulu camp was reopened to support surface exploration, engineering, environmental and archaeological studies between 2004 and 2006. The portal was reopened in 2005 and 2006.

Wolfden was acquired by Zinifex Ltd. in 2007, which merged with Oxiana Ltd. to become Oz Minerals Limited in 2008. A portion of Oz Minerals' assets, including the Ulu Gold Project, was acquired in 2009 by China Non-Ferrous Metals Co Ltd., Minmetals, the company now operating as MMG Resources Inc. Bonito Capital Corp. ("Bonito"), a wholly owned subsidiary of Elgin Mining Inc., acquired the property in 2011. The Ulu camp was inactive during this period.

In 2012, Bonito refurbished and updated the 50-person camp and kitchen to conduct surface exploration. In 2014, Bonito was acquired by Mandalay Resources Corporation. The Ulu camp has been reopened seasonally since 2015 to conduct care and maintenance work, progressive reclamation, and support surface exploration in the region. Blue Star acquired 100% interest in the Ulu Gold Project in February 2020.

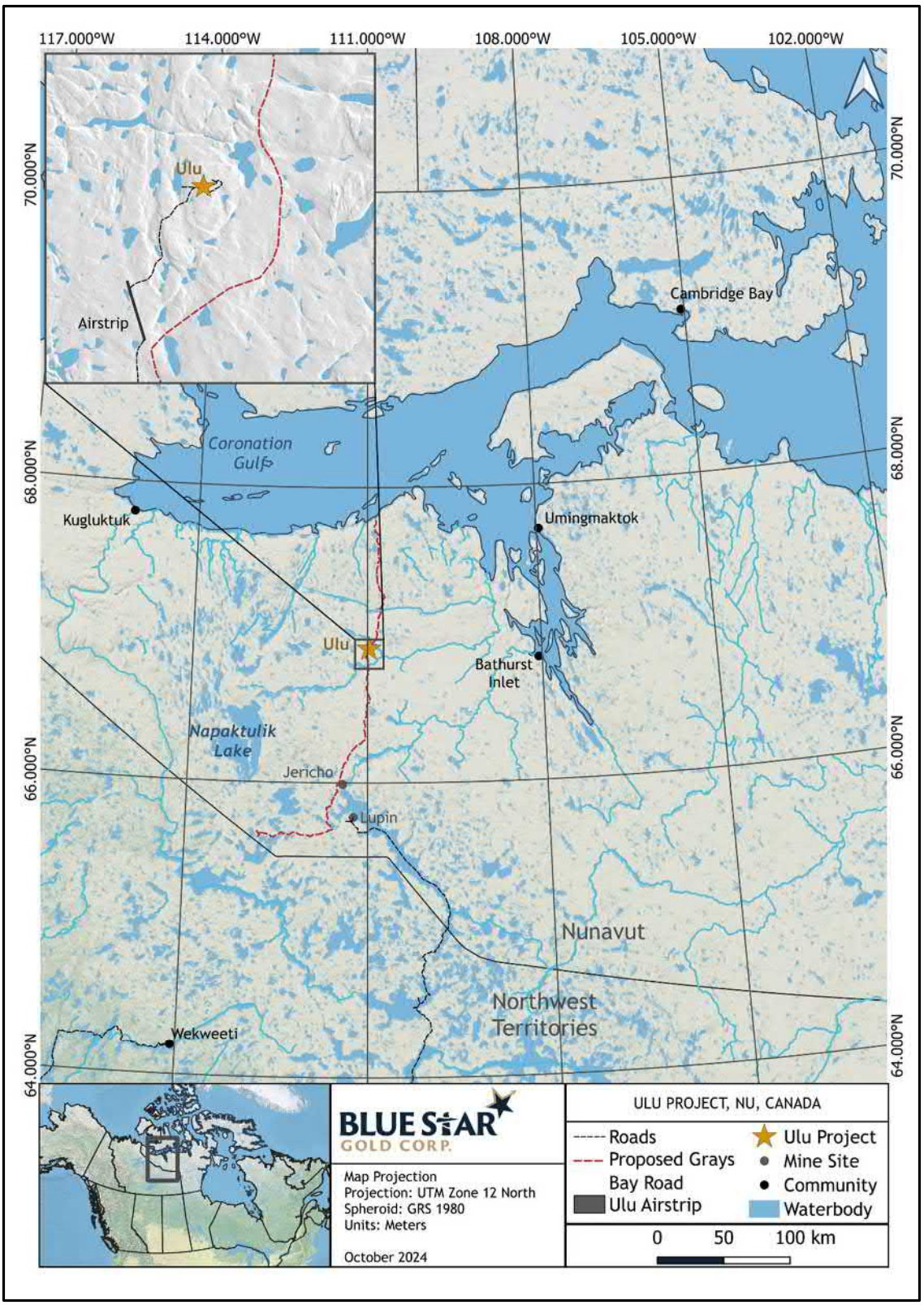


Figure 2. Ulu Gold Project site access.

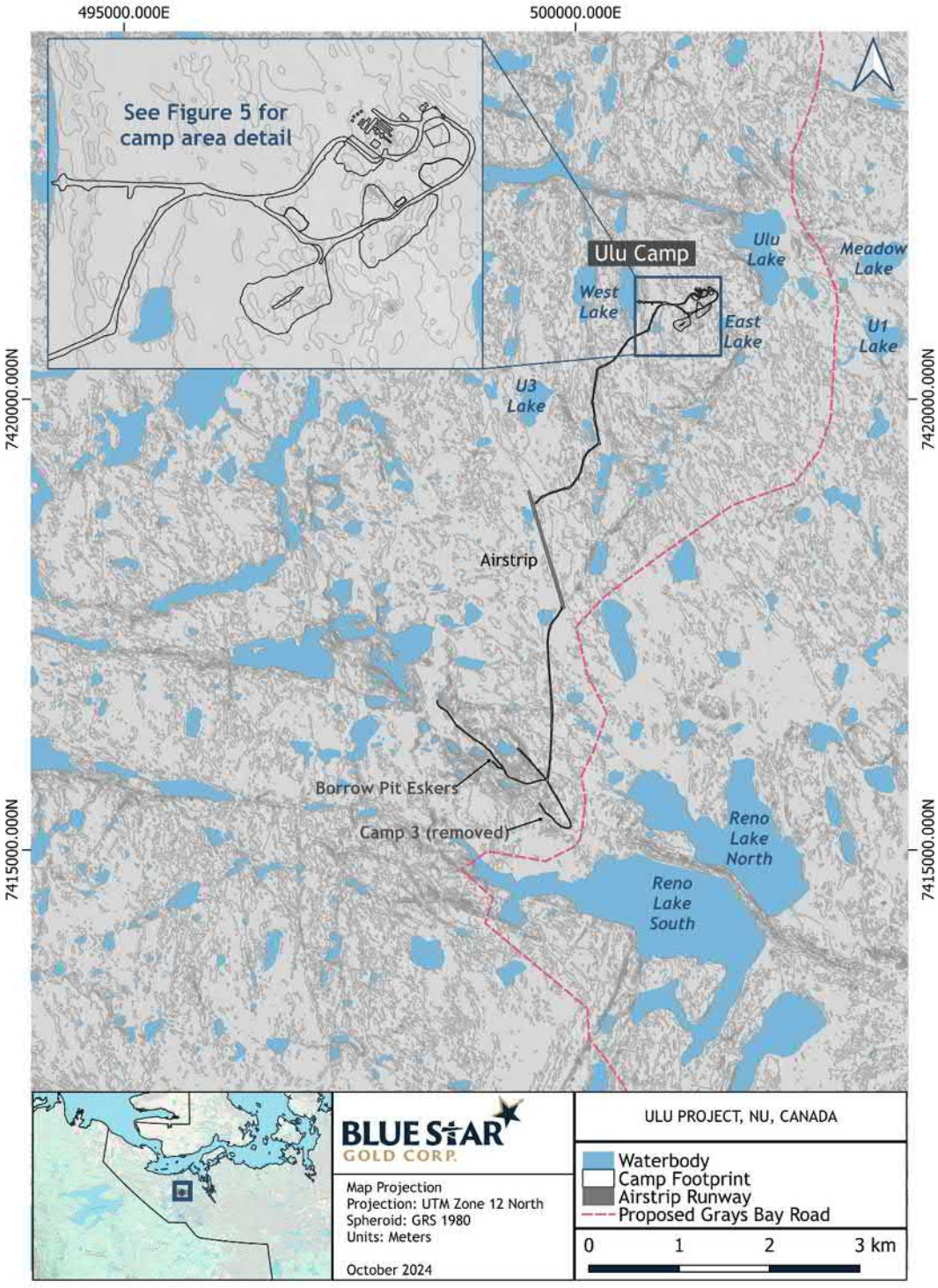


Figure 3. Ulu Gold Project site plan; see Figure 5 for detail of the camp area.

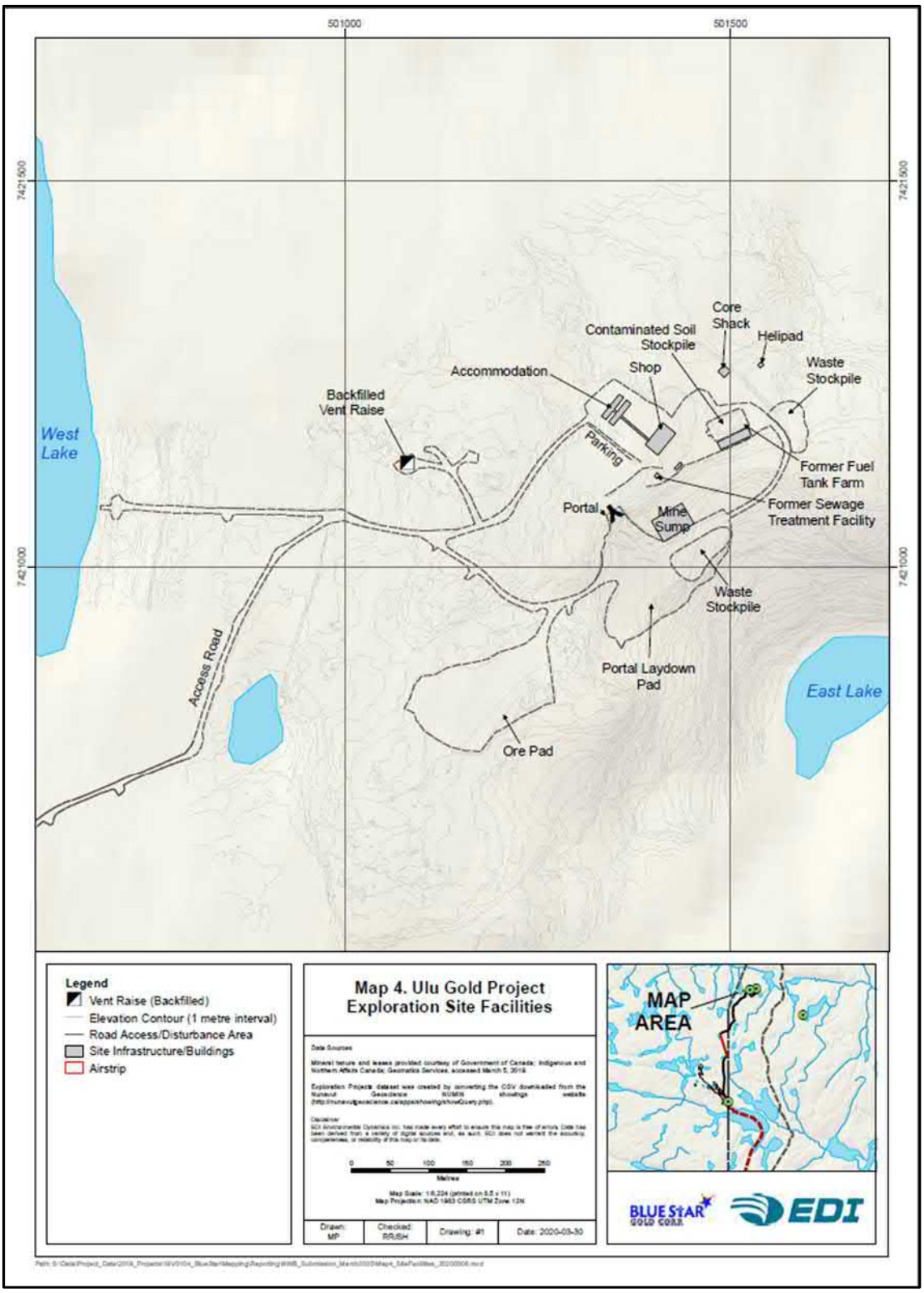


Figure 4. Ulu Gold Project exploration site facilities 2020.

2.3 ONGOING ACTIVITIES

2.3.1 EXPLORATION AND OTHER ACTIVITIES

Concurrent with progressive reclamation of Ulu, Blue Star is undertaking exploration-related activities at Ulu, the adjacent Hood River area, and regionally including the Roma project area, with all activities licenced under either 2BE-HRP1932 or 2BM-ULU2030 (as amended or succeeded). Exploration activities include geophysics, mapping, sampling and drilling. Crews will be based predominantly out of Ulu and may establish temporary satellite camps and fuel caches throughout the regional study area.

Blue Star may also undertake local and regional baseline environmental studies in support of a future impact assessment.

2.3.2 SITE MONITORING AND MAINTENANCE

Site monitoring and maintenance will be carried out in accordance with site authorizations and approved management plans.

2.3.3 CAMP MAINTENANCE

Camp has been maintained and modified since 2019 to make the site more safe and more functional by removing substandard and at-risk camp infrastructure elements remaining from previous owners.

2.3.4 ONGOING PROGRESSIVE REMEDIATION ACTIVITIES

Changes to the camp infrastructure have resulted from the on-going progressive reclamation activities (Figure 5). Progressive reclamation continues in parallel with exploration activities and actively includes the following:

- Demolition or decommissioning of unsafe, non-operational infrastructure or equipment
- On-going evaluation of options for long term PAG rock management.
- On-going ML/ARD monitoring
- Thermal monitoring study of cover thicknesses and cover sequences
- Continued evaluation and management of contaminated pad building materials
- Identification and segregation of contaminated infrastructure soils

2.4 COMPLETED RECLAMATION MEASURES

2.4.1 PRECEDING OWNERS ACTIVITIES

When underground and surface exploration activities were suspended in 1996, Echo Bay (the property owner at that time) relocated some tools, small equipment, and supplies by air to the Lupin Mine. The accommodations at Camp 3 were removed upon the development of the Ulu Camp, with the exception of the garage by Echo Bay. The Ulu site was placed into a care and maintenance status and no progressive reclamation activities were completed until 2014. Since 2014, the preceding owner undertook progressive reclamation of Ulu. At the time of acquisition, the following key activities are understood to have taken place:

- Backhaul of waste and hazardous materials to Yellowknife for offsite disposal.
- Demolition of the Camp 3 fuel tank farm, excavation of the adjacent impacted soil, and relocation of the contaminated soil to the Ulu Camp.

- Removal from service, cleaning, and demolishing all fuel tanks.
- Demolition of accommodations considered by the preceding owner to be unnecessary for future site activities.
- Demolition of the Camp 3 garage.
- Decommissioning of the sewage treatment facility and associated infrastructure.
- Decommissioning of the water supply infrastructure.
- Burning of wood waste.
- Consolidation of the resulting demolition waste into select areas at the Ulu camp.
- Backfilling the vent raise.
- Cutting a number of diamond drill casings flush with the ground.
- Road maintenance repairs.

2.4.2 CURRENT OWNERS ACTIVITIES

Since Project acquisition in 2020, the current owner has undertaken exploration and progressive reclamation of Ulu in parallel. Since the time of acquisition, the following key activities have taken place:

- Backhaul of waste and hazardous materials to Yellowknife for offsite disposal.
- Evaluation of contaminated soils at the site and within the soil storage location at the site.
- Evaluation of Metal Leaching / Acid Rock Drainage ("ML/ARD") of the Potentially Acid Generating ("PAG") rocks used at site for various infrastructure pads.
- Creation of a non-hazardous waste landfill facility ("Landfill").
- Depollution of select equipment destined for the Landfill.
- Placement of stockpiled non-hazardous waste with void filling using clean quarry sand and reuse (surface and subsurface) soils from the Soil Storage Area into the Landfill.
- Demolition of the Ulu camp shop.
- Burning of wood waste.
- Consolidation of the remaining waste into select areas at the Ulu camp.
- Analysis of soils used in infrastructure and pad construction for hydrocarbon contamination
- Identifying, prioritising and staging PAG rock on surface
- Replacing sections in Camp 3 Road and Culvert 6 with clean esker sands, these areas previously repaired by preceding owner with mineralised waste rock
- Ore pad PAG pullback and interim piling with cover (limestone/sand)
- Proof of concept in PAG rock management
- Cleaning up of a number of historical drill sites (2004) and cutting a number of diamond drill casings flush with the ground.
- Road and airstrip maintenance and repairs.

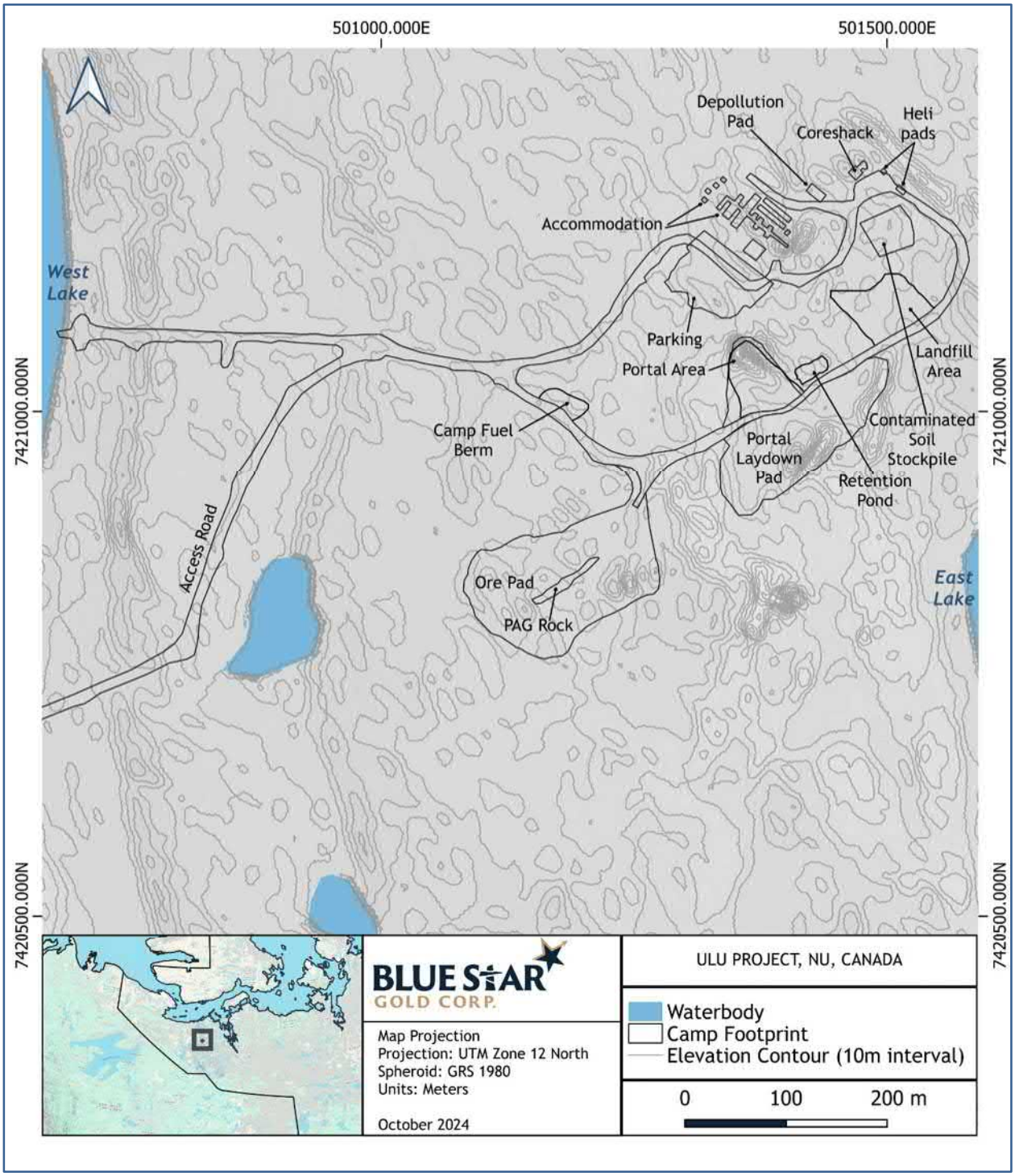


Figure 5. Ulu camp facilities as of year-end 2025.

3.0 EXISTING CONDITIONS

3.1 PHYSICAL AND CHEMICAL ENVIRONMENT

3.1.1 PHYSIOGRAPHY

The Ulu site is situated in the treeless arctic tundra where rock and glacial features dominate the landscape. The topography of the Ulu mining lease is characterized by deeply incised linear valleys bounded by steep bluffs, for about 85 m of relief. The basalt units form topographic plateaus, elevated above the sediments and granitic rocks. The typical landscape surface consists of 50-60% outcrops, north-trending lakes (accounting for less than 15%), and grassy swamps, boulder-strewn glacial drift and frost-heaved blocks (Cowley, 2015).

Regional drainage is easterly into Bathurst Inlet. Major rivers include the James River to the north and the Hood River which is located 8 km south–southeast of Ulu (Figure 6). Drainage in the vicinity of the Ulu mining lease is characterized by ponds of standing water without associated inlets or outlets. Locally, the property is located within the Rio Fido watershed which includes Penthouse Lake, located approximately 2.5 km southeast of Ulu and draining northeastward into Frayed Knots River, a tributary of the Hood River. The Hood River valley is incised more than 100 m below the surrounding upland plateau. The Hood River eventually flows into the Arctic Ocean near Bathurst Inlet (Cowley 2015).

3.1.2 SURFICIAL AND BEDROCK GEOLOGY

Quaternary surficial deposits include thin bouldery sandy-silty till veneers less than 2 m thick, thicker hummocky drift sheets likely composed of both subglacial and ablation tills which obscure bedrock, and areas of extensive glaciofluvial sediments such as eskers, esker complexes, deltas, and kames (Cowley 2015).

Permafrost 50 km north of the site (at the High Lake exploration project), calculated from temperature measurements in exploration drill holes, is approximately 440 metres deep (TBT Engineering, 2010). Thermistors installed underground at Ulu on the 75 m level indicated an average rock temperature of minus (-) 9.5 degree Celsius (°C) at that elevation (Tansey, 1997). Thermistors installed in esker cover and run-of- mine rock (waste rock) of the infrastructure pads indicate an average surface thaw depth of two meters in the unconsolidated materials (SRK, 2022).

The Project is located within the Slave Structural Province, an Archean granite-greenstone terrain. Rocks within the Slave Structural Province are assigned to the following three lithotectonic assemblages: an early assemblage of gneisses, granitic rocks and quartz arenites; greywackes, mudstones, volcanic rocks and syn-volcanic intrusions of the Yellowknife Supergroup; and a younger sedimentary-plutonic assemblage of clastic sediments and granitic rocks.

The Ulu deposit is an epigenetic lode-gold occurrence. It is located on the western margin of the High Lake Volcanic Belt, where Yellowknife Supergroup rocks are in contact with an Archean granitic batholith. On the property, the greenschist- to amphibolite-facies mafic volcanic and sedimentary rocks are folded into a 3 km long anticline (Figure). Gold-arsenic zones show a strong spatial association with the trace of this anticline. The Flood zone, the largest gold-rich zone, is localized in the west limb at the core of this fold. It generally dips steeply (70° to 80°) to the southwest. Mineralization is hosted in high-iron tholeiitic basalt sequence characterized by a lower amphibolite mineral assemblage of ferro-hornblende + plagioclase +

ilmenite with accessory quartz and epidote. Alteration minerals consist of biotite, chlorite, hornblende, actinolite-tremolite, and potassium feldspar (microcline) with minor calcite, epidote, tourmaline, and titanite. The highest gold values occur where brecciated clasts of basaltic wall rock are replaced by acicular arsenopyrite + quartz + K-feldspar (Flood *et al*., 2004).

3.1.3 GEOCHEMICAL CHARACTERIZATION OF BORROW, ORE AND WASTE ROCK

Borrow rock

SRK Consulting was involved in evaluating four potential sites for borrow rock (SRK, 2021) previously identified in SRK (2020). One of four sites was selected for additional study. The favourable site was considered to have low potential for metal leaching and not expected to generate ARD (SRK, 2021). To date, no borrow rock has been used including material from this identified favourable location.

Ore and Waste Rock

In 2019, prior to completing the Project acquisition, Blue Star retained qualified professionals to assess the geochemical characteristics of the ore and waste rock on surface at the Ulu camp and review past geochemistry assessments of the ore and waste rock to inform progressive reclamation planning. The assessment confirmed previous findings that the ore currently on surface may generate acidic drainage within a short timeframe and the rates of metal leaching are expected to increase under acidic conditions. Increased rates of metal leaching may be expected from the waste rock on surface under acidic conditions. Historical kinetic testing of crushed waste rock (0.2 to 3.0 mm in size) indicated that the onset of acidic conditions would be delayed for decades. Geochemical characterisation and assessment continued into 2021 using a qualified consulting professional with monitoring on-going since. More recent data suggest that the waste rock and ore rock currently on surface and not covered by esker sand has increased potential and accelerating rates of metal leaching and acid generation potential in some areas (SRK, 2023).

Numerous test pits have been excavated around the Ulu site now that the stored demolition and reclamation waste has been placed in the Landfill or removed from site; this has provided access to previously less accessible areas of infrastructure pad construction. Observations resulting from test pitting in 2021, 2022 and 2023 indicate that there are sections of waste rock within the infrastructure pads that are nearing the end of their ability to neutralise potential acid generation from the waste rock (SRK, 2024). In 2023 and in 2024 SRK has noted that all of the waste rock material excavated from the Ulu decline is potentially acid generating and through monitoring has identified a number of areas that are becoming high risk and termed them Priority 1 and Priority 2 areas (SRK, 2024). These are to be subject to interim storage on the ore pad and that the rock at Ulu needs to be managed through the development an implementation of an ML/ARD management plan (SRK,2025).

Esker Material

A historical geochemical assessment of the existing esker borrow pits has not been located within historical files. SRK was not involved in the analysis program design however was involved in evaluating the material for use in remediation activities. Three samples were collected from the currently used section of the quarry; five of six samples were considered non-PAG including the three from the active quarry with the one sample not expected to generate ARD and metal leaching potential considered to be low (SRK, 2021) collected from the old Camp 3 site.

3.1.4 SURFACE WATER

West Lake has been the licensed source of water since 1997, and East Lake received sewage treatment plant effluent prior to 2012. The drainage basins for East and West Lake were defined in 1996 by Echo Bay

with the drainage divide occurring through the ore pad. Surface runoff (including the majority of runoff from the ore storage pad, portal laydown area, and main camp area) flows predominately towards East Lake, which in turn drains into Ulu Lake (Gartner Lee, 2006). A small portion of surface runoff flows towards West Lake and almost all of this runoff is through material that was not covered with esker sand.

As presented in the Environmental Assessment for the Ulu Project (EBM, 1997) Reno Lake North, Reno Lake South, West Lake and Ulu Lake are oligotrophic, having soft water, and being highly sensitive to acidity. Concentrations of essential nutrients are low.

In 2004, preliminary baseline water quality studies were carried out in the Ulu area to build on the previous studies carried out at the Project (Gartner Lee, 2005). Study areas included Ulu, West and East Lakes as well as several creeks. Ulu Lake was considered to be a suitable reference site at the time. West Lake is similar in character to Ulu Lake, although has higher hardness, conductivity, and sulphate levels than that observed in other lakes in the area. East Lake is similar in water quality to the other lakes in the area yet contained a moderate level of nutrients, is moderately productive and meso-eutrophic.

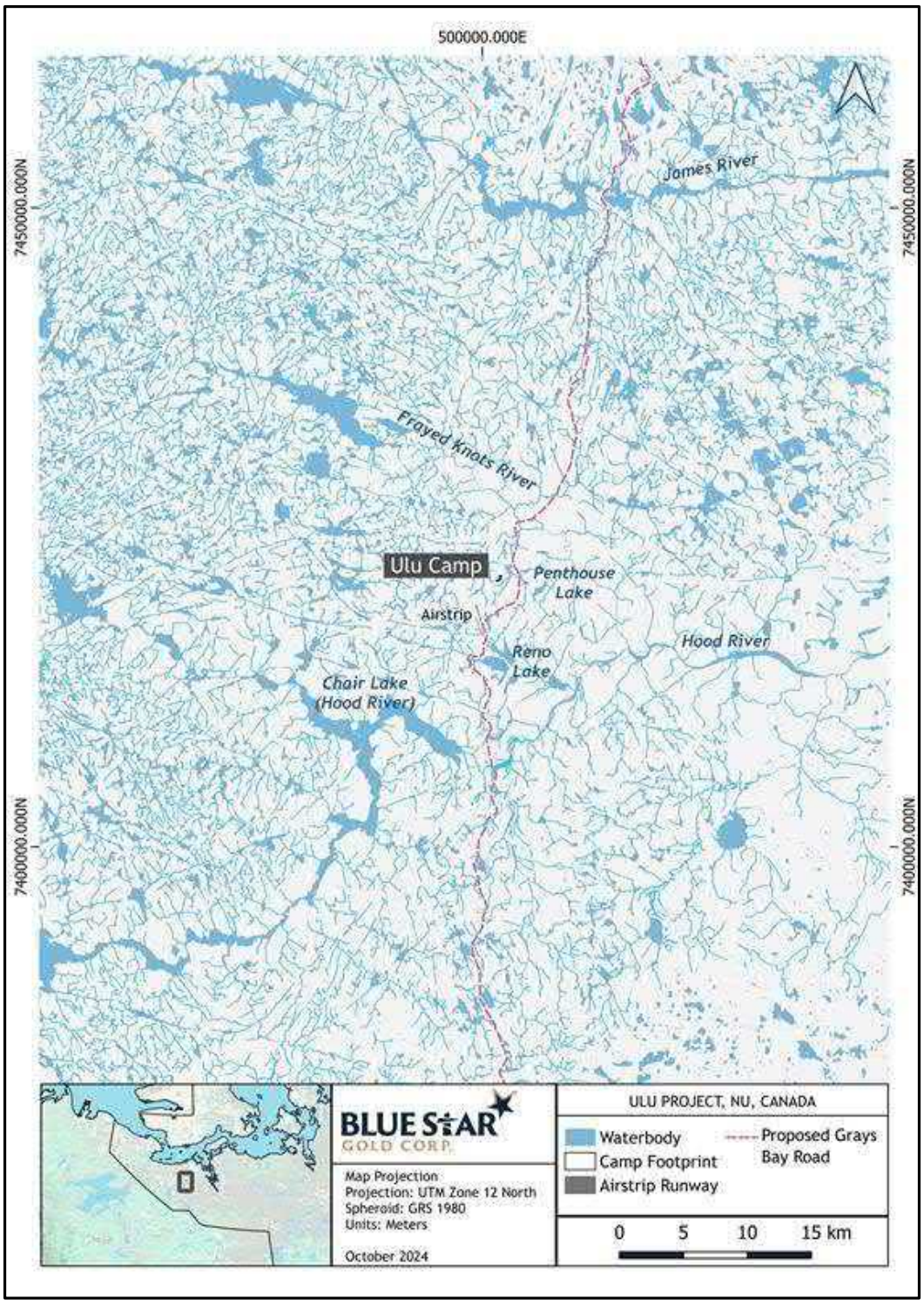


Figure 6. Ulu Gold Project regional physiography.

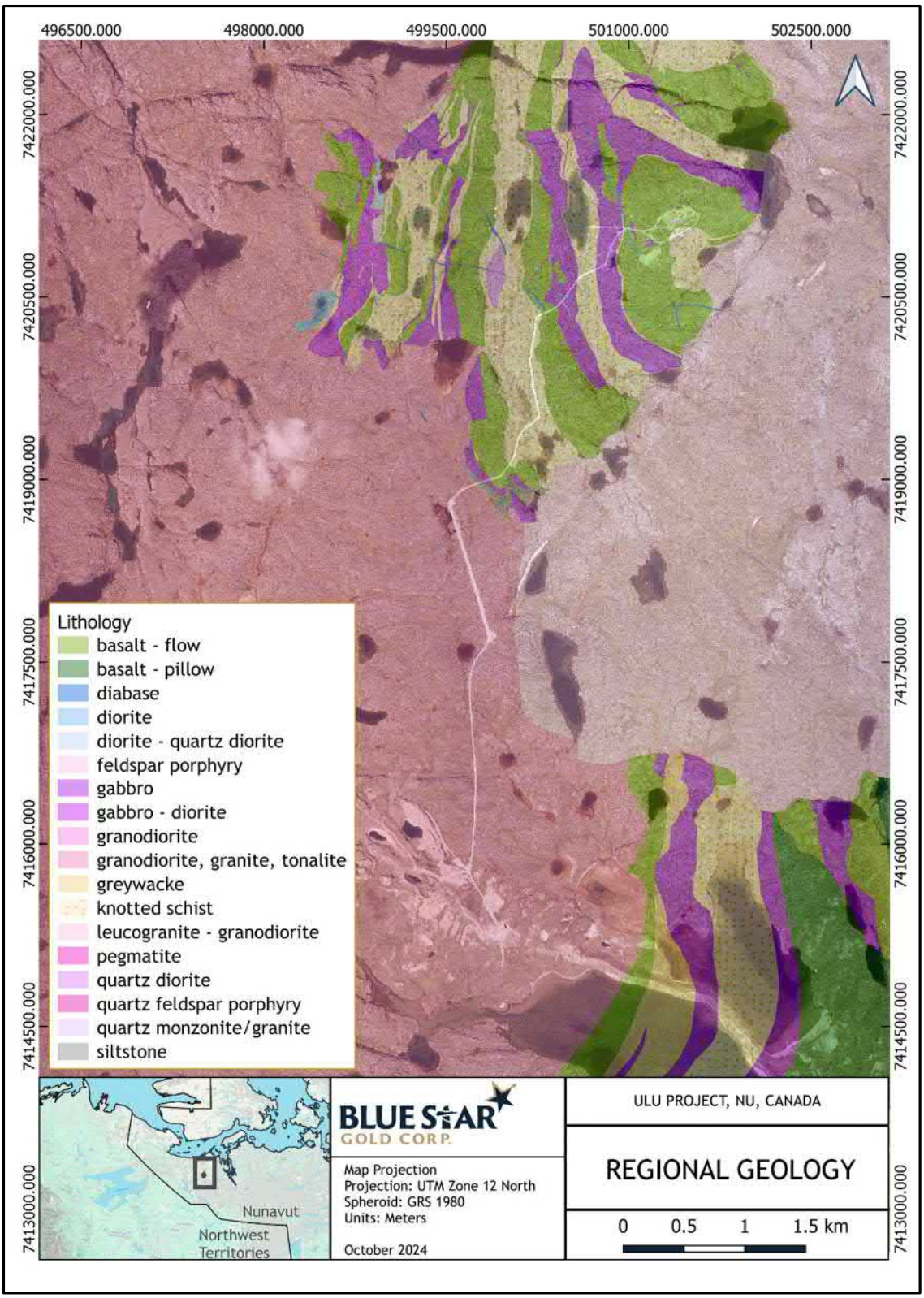


Figure 7. Ulu Gold Project regional geology.

3.1.5 CONTAMINATED SOIL

In 2019, under the supervision of the preceding owners, a qualified professional to conduct a site assessment to determine the volume and character of petroleum hydrocarbon ("PHC") impacts at the site. Blue Star has continued to evaluate potential volumes of the contaminated soils including additional sampling of existing storage piles and the camp infrastructure pad with sampling occurring in 2021, 2022 and 2024 (Figure 8) using qualified professionals to undertake this work (KBL 2021, KBL 2022, KEL 2024). Note in the Figure the samples in the very northeast were determined to be of biogenic origin (KEL 2024).

Original nomenclature of sampled areas translated to current nomenclature is presented in Table 4. Over time the aerated soils in the storage area are becoming reusable. The current assessment is included as Appendix B and the current consolidated estimated volumes of PHC contaminated soil to be managed is in Table 5. The 2024 sampling program included areas previously sampled and was expanded to include areas that were previously covered with demolition debris. Where possible, repeated sampling of the same sites is noted however as documented in 2020 (Stearman, 2020) the material placed in the old tank farm (Soil Storage Area) was split into piles and labelled TSP-##; sampling in 2021 became the baseline samples for these piles.

Table 4: Correlation of 2019 soil sampling to subsequent sampling

Original Area	Description	Current Area
Camp 3 Tank Farm	Soils moved to Soil Storage Area in 2019/2020	Not used
Camp 3 Stockpile	Soils moved to Soil Storage Area in 2019/2020	Not used
Main Tank Farm	Includes Main Tank Farm perimeter and drive-thru	**Soil Storage Area**
Day Tank Farm	Includes Day Tank Farm perimeter	**Day Tank Area**
Shop Floor	Includes shop perimeter	**Shop Area**
Parking Areas	All other areas sampled in 2019	**Parking Area 1**
		Parking Area 2
	Where debris was stored prior to landfill	**Upper Laydown Area**
	Adjacent to debris storage for landfill	**Tundra Area**
	Where debris was stored prior to landfill	**Lower Laydown Area**

3.1.6 CONTAMINATED ROCKS

In 2021, after the initial phase of landfilling was completed additional test pitting in areas that were covered with debris were excavated to determine the status of the rock pads. In two locations hydrocarbon contamination was noted within the coarse rock (pers.comm., D.Godley, 2021). In 2022 contaminated soil sampling programs were expanded to include the contaminated rock areas identified in 2021, sampling results indicated only very local contamination (KEL, 2023) however additional studies are required to delineate the extent of the issue and development a management strategy to treat this material.

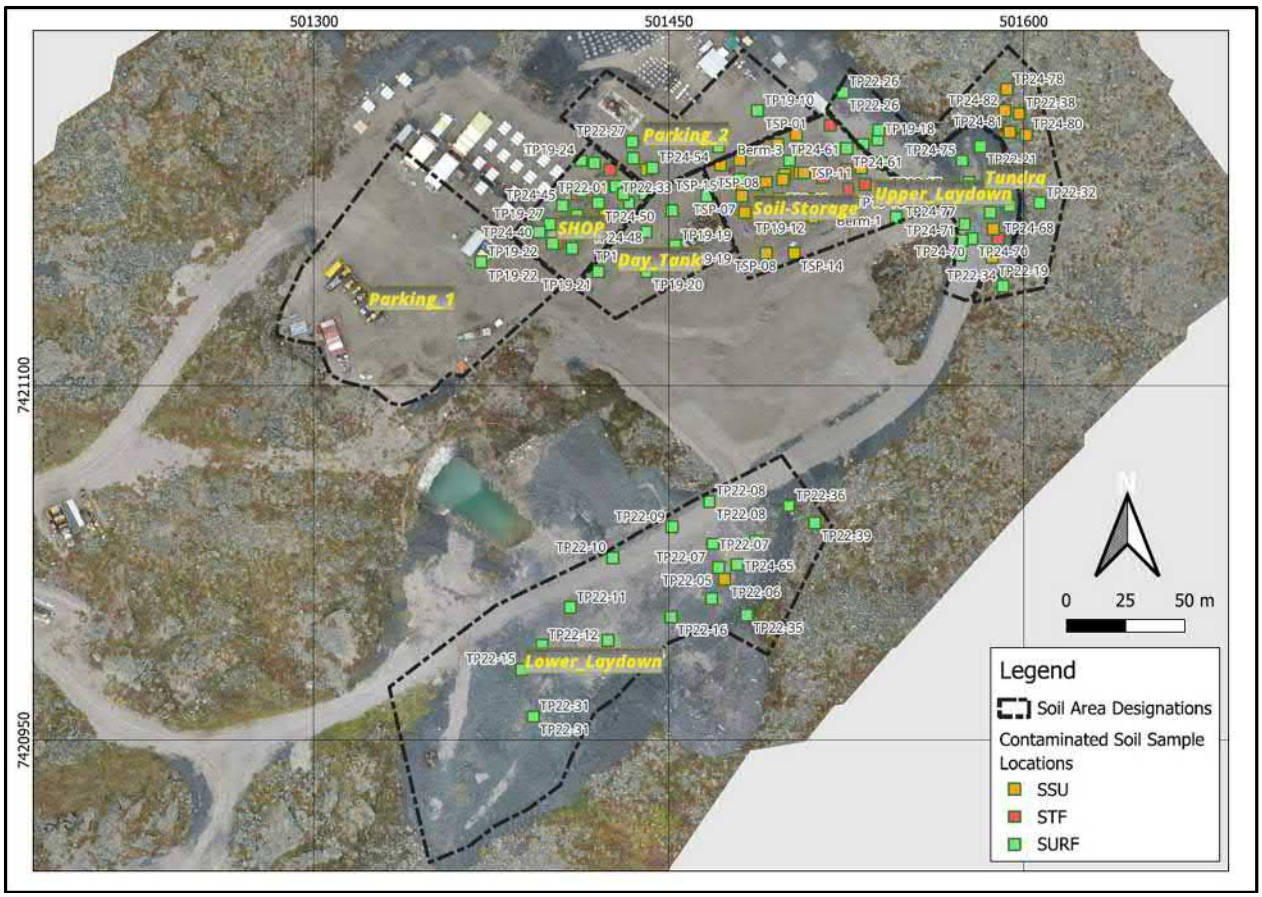


Figure 8: Current areas under study for PHC contamination; SSU = sub-surface reuse criteria met, STF = to be placed in STF, SURF = surface re-use criteria met.

Table 5. 2024 Consolidated petroleum hydrocarbon contaminated soil volume estimate (KEL, 2024).

Area	Soil to be treated (m^3)	Soil to be managed by burial (m^3)	Soil to be shipped offsite for treatment (m^3)
Soil Storage Area	354	0	0
Shop	426	138	10*
Day Tank	50	0[1]	10*
Parking 1	0	0[1]	0
Parking 2	100	0[1]	0
Upper Laydown	188[2]	0[2]	0
Lower Laydown	0[2]	0[2]	0
Tundra	0[3]	0[3]	0
SUM	**1018**	**138**	**20**

Notes:
* 2019 sampling not yet reproduced; volume based on (Stearman, 2020).
[1] Segregation of soil during excavation could adjust the volume of soil destined the soil treatment facility
[2] Segregation of materials during excavation could generate rock contaminated and soil contaminated fractions
[3] Biogenic

3.2 BIOLOGICAL ENVIRONMENT

3.2.1 VEGETATION AND WILDLIFE

The Project is located within the Southern Arctic Ecozone and the Takijuq Lake Upland Ecoregion. Much of this region is composed of unvegetated rock outcrops. Vegetative cover is characterized by shrub tundra, consisting of dwarf birch, willow, northern Labrador tea, avens species and blueberry species. Organic cryosols are the dominant soils in the lowlands and permafrost is deep and continuous (ECCC 2019).

Characteristic wildlife includes barren-ground caribou, muskoxen, grizzly bear, wolverine, Arctic hare, Arctic fox, red fox and wolf. Small mammals (e.g., Arctic ground squirrel, voles, and lemmings) are distributed throughout the region and provide an important food source for predators. Many species of migratory birds are present in the area during the summer season, including waterfowl, raptors, songbirds, and shorebirds, while some bird species are present year-round, e.g., ptarmigan, gyrfalcon, and common raven (ECCC 2019).

3.2.2 FISH AND FISH HABITAT

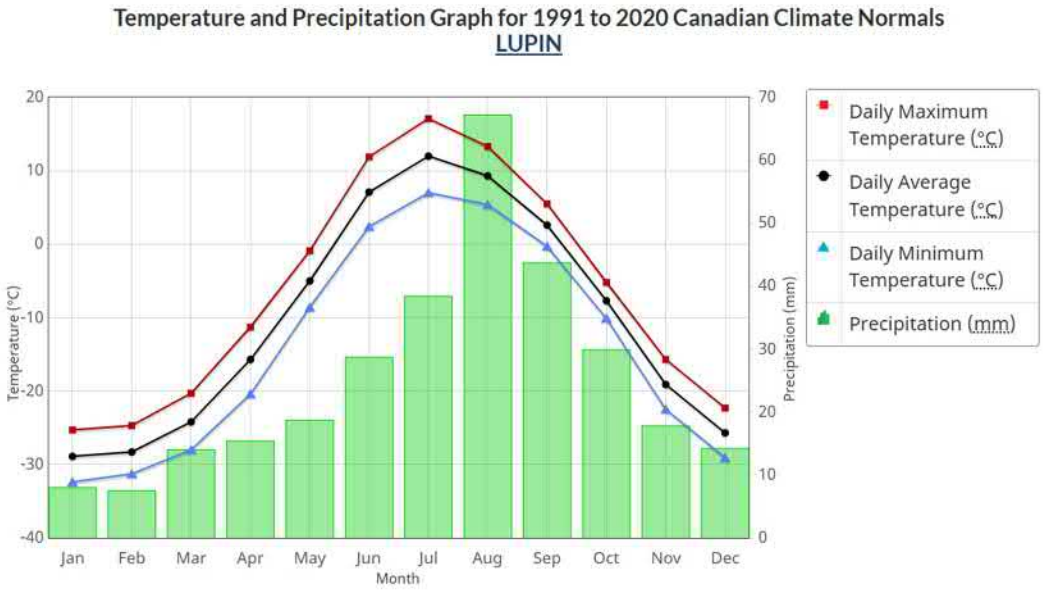
As presented in Gartner Lee Ltd. (2006), results of food web, fish, and fish habitat studies indicate that West Lake has a similar benthic community composition to that found in other lakes in the area, being one dominated by arthropods. Compared to other lakes in the area, West Lake was observed to have a higher plankton species richness, dominated by a diatom that is characteristic of a low-nutrient lake. Adult lake trout were sampled in West Lake and some sampled were found to be in spawning condition. West Lake provides rearing, spawning and nursery habitat.

3.3 ATMOSPHERIC ENVIRONMENT

Weather is typical of the continental barrenlands, which experience cool summers and extremely cold winters. Winter temperatures can reach -45°C and high winds can create extreme wind chill conditions and extensive drifting snow. Summer temperatures are generally in the range of 5° to 10°C. Based on regional normals from Lupin station between 1991 and 2020 (ECCC, 2023), average yearly rainfall in the region is 160 mm, mostly occurring during July and August, and average yearly snowfall is equivalent to 143 mm of water, most of which falls during autumn and spring. The average yearly temperature is -10.3°C. Monthly average precipitation and temperature normals are described in Figure 9 and Table .

The ground remains snow-covered for more than 250 days a year. Snow accumulation begins in September and remains into June. Annual snowfall falls during autumn and spring storms. Small lakes are clear of ice usually by the third week in June (though ice on the larger lakes can persist into the middle of July) and start freezing over again in mid to late September. Wind gust speeds have been recorded in excess of 100 km per hour (Cowley, 2015) however average 15 km per hour (ECCC, 2023).

Weather information was collected between June and mid-September between 1990 and 1992 by BHP from its portable weather station at Penthouse Lake. Data collected from Penthouse Lake is compared to data collected at Lupin and Kugluktuk during the same time period in Table . For the majority of the time, recorded wind speeds were in excess of 25 km per hour and generally were from the south (Cowley, 2015).



Source: https://bit.ly/3CMONyT

Figure 9. Temperature and precipitation normals.

3.4 SITE FACILITIES

3.4.1 BUILDINGS, OTHER STRUCTURES AND EQUIPMENT

Camp 3

A fuel tank farm (consisting of two 1,324,895 L and six 52,995 L tanks), explosives magazine, detonator magazine, garage, and the esker borrow pits were developed at Camp 3. The esker borrow pits were used

to build and maintain the road and airstrip and to establish the camp pad and portal pad at the Ulu exploration camp. The fuel tank farm was demolished in 2018, with all tanks subsequently cut and depolluted prior to the current ownership, with associated PHC contaminated soil transported to the Ulu camp for storage. The camp and garage have been demolished. Demolition waste was transported to Ulu camp for disposal.

In 2021 de-polluted demolition debris and non-hazardous debris was placed in the Landfill. Mobile equipment located at the Ulu camp was used to demolish, excavate contaminated soil, and transport the waste.

Ulu Camp

The acquired Weatherhaven residential complex has been modified to consist of 10 rooms, 18 sleeper tents, an office, a kitchen, and dry. Additional infrastructure at Ulu camp consists of a carpentry shop, vehicle parking, generators, core shack, core storage, ore storage pad, portal pad (waste rock pad), mine workings, mine sump (water retention pond), access roads, lined contaminated soil storage berm and fuel containment berms. The tanks in the historic bulk fuel tank farm (which had consisted of five 52,995 L tanks) and day tank farm were demolished in 2018, depolluted in 2020 and 2021 and placed in the landfill. The freshwater system, sewage treatment plant, and sewage line were decommissioned by the preceding owner. The truck shop was decommissioned and demolished in 2024 and placed in the landfill with some components backhauled for disposal.

The current residential complex including storage sea containers, fuel berms and active work buildings, carpentry shop and core shack, all remain as the on-going exploration camp.

A list of mobile equipment at Ulu camp and its current operational status is provided in Table . The majority of the decommissioned equipment has been depolluted, including a transformer, and placed in the landfill with remaining equipment staged for depollution in preparation for disposal as outlined in the referenced Table.

Table 6. Precipitation and temperature normals based on Lupin A records.

Parameter	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Year
Rainfall (mm)	0	0	0	0.6	4.8	25.1	38.1	65.4	25.7	0.9	0	0	160.5
Snowfall (mm)	8.0	7.9	14.0	14.9	13.8	3.7	0.3	1.9	17.9	29.0	17.8	14.2	143.3
Precipitation (mm)	8.0	7.9	14.0	15.4	18.7	28.7	38.4	67.2	43.7	29.9	17.8	14.2	303.5
Daily Average Temperature (°C)	-28.9	-28.3	-24.2	-15.7	-5.0	7.1	12.0	9.3	2.6	-7.7	-19.1	-25.7	-10.3
Daily Maximum Temperature (°C)	-25.3	-24.7	-20.3	-11.3	-0.9	11.9	17.1	13.3	5.5	-5.2	-15.7	-22.3	-6.5
Daily Minimum Temperature (°C)	-32.4	-31.3	-28.0	-20.4	-8.6	2.4	7.0	5.4	-0.3	-10.1	-22.5	-29.1	-14.0

Source: Compiled into text from ECCC 2023 https://bit.ly/3CMONyT

Table 7. Weather data comparison for the region – 1990-1992.

Parameter		Penthouse Lake	Lupin	Kugluktuk
JUNE	Mean Daily Temp.	5.8°C	4.7°C	3.8°C
	Max. Temp.	28.0°C	24.4°C	27.8°C
	Min. Temp.	-6.0°C	-13.9°C	-15.0°C
	Rainfall (mm)	0	24	14
JULY	Mean Daily Temp.	11.6°C	9.7° C	9.7°C
	Max. Temp.	30.0°C	27.2°C	32.2°C
	Min. Temp.	-2.0°C	-2.2°C	0.6°C
	Rainfall (mm)	18	36	25
AUG	Mean Daily Temp.	5.5°C	8.7°C	8.7°C
	Max. Temp.	22.0°C	24.4°C	29.4°C
	Min. Temp.	-4.0°C	-3.2°C	-3.3°C
	Rainfall (mm)	23	41	38
SEPT	Mean Daily Temp.	1.4°C	2.0°C	2.5°C
	Max. Temp.	15.0°C	16.7°C	26.1°C
	Min. Temp.	-7.0°C	-11.9°C	-20.0°C

Source: Cowley 2015

Table 8. List of Existing Equipment.

UNIT NUMBER	Year	Model	MAKE	DESCRIPTION	UP	DOWN	Ops Necessessity	Disposal Method
PK-01	1991	956	CATERPILLAR	Smooth Drum Roller	x		X	backhaul road
EX-01	1994	311	CATERPILLAR	*excavator (small)*	x		X	backhaul road
DZ-01	1989	D8N	CATERPILLAR	*Dozer (medium)*	x			backhaul road
GR-01	1980	14G	CATERPILLAR	*Grader (medium)*	x			backhaul road
HT-01	1984	769C	CATERPILLAR	*Haul truck (medium)*	x		X	backhaul road
HT-02	1984	769C	CATERPILLAR	*Haul truck (medium)*		X		backhaul road
LD-01	1981	966D	CATERPILLAR	*Loader (medium)*		X		backhaul road
LD-02	1984	988B	CATERPILLAR	*Loader (large)*		X		backhaul road
PU-05	1995	CAB	KUBUTO	*passenger carrier*	X			backhaul via air
WELD-01	2005	400D	LINCOLN	*Welder (stick)*	X		X	backhaul via air
COMP-01	1995	HQ375	Le ROI	*Air compressor 100 cfm*	X		X	backhaul via air
GEN-01	2018	4TNV98	YANMAR	*3 phase main gen*	X		X	backhaul via air
GEN-02	2014	XQ20	CATERPILLAR	*1/3 phase backup*	X		X	backhaul via air
GEN-06		DK	WALLENSTEIN	*7300e diesel*	X			backhaul via air
TRI-01	1991	357	PETERBUILT	*Tri axle*	X		X	backhaul road
TRI-02	1989	13 speeds	VOLVO	*Volvo water truck*		X		backhaul road
TRI-03	1978	Foremost	FOREMOST	*Commander*	X			backhaul road
LOW-01	1988	40ft	NORTH CANADIAN	*flatbed 40ft (43,180kgs)*	X			backhaul road
BUS-01	1989	D600	FORD	*20 Passenger*	X			backhaul road
EX-02	2013	85D	John Deere	*excavator (small)*	X		X	backhaul road
TH-01	2008	520-50	JCB	*Telehandler*	X		X	backhaul road
Clam -01	2009		Decap	*Clam dump trailer*	X		X	backhaul road
skid-01	2012	SR200	Case	*Skidsteer*	X		X	backhaul via air
SXS-01	2023	RTV-520R-A	Kubota	*Side By Side*	X		X	backhaul via air
SXS-02	2023	RTV-X1140	Kubota	*Side By Side*	X		X	backhaul via air
GEN-03	2012	XQ30	CATERPILLAR	*30Kw*	X			backhaul via air

Note: Disposal method subject to change.

3.4.2 MINE WORKINGS

In 1996, a 632 m long 5.2 m wide by 4.9 m high -15% ramp was developed to the 75 m level to access the Flood Zone. In 1997, the ramp was extended to the 155 m level, an escape way/fresh air vent raise and seven cross-cuts were excavated (Figure 10). The portal was closed to prevent access and the vent raise was backfilled both by the preceding owner.

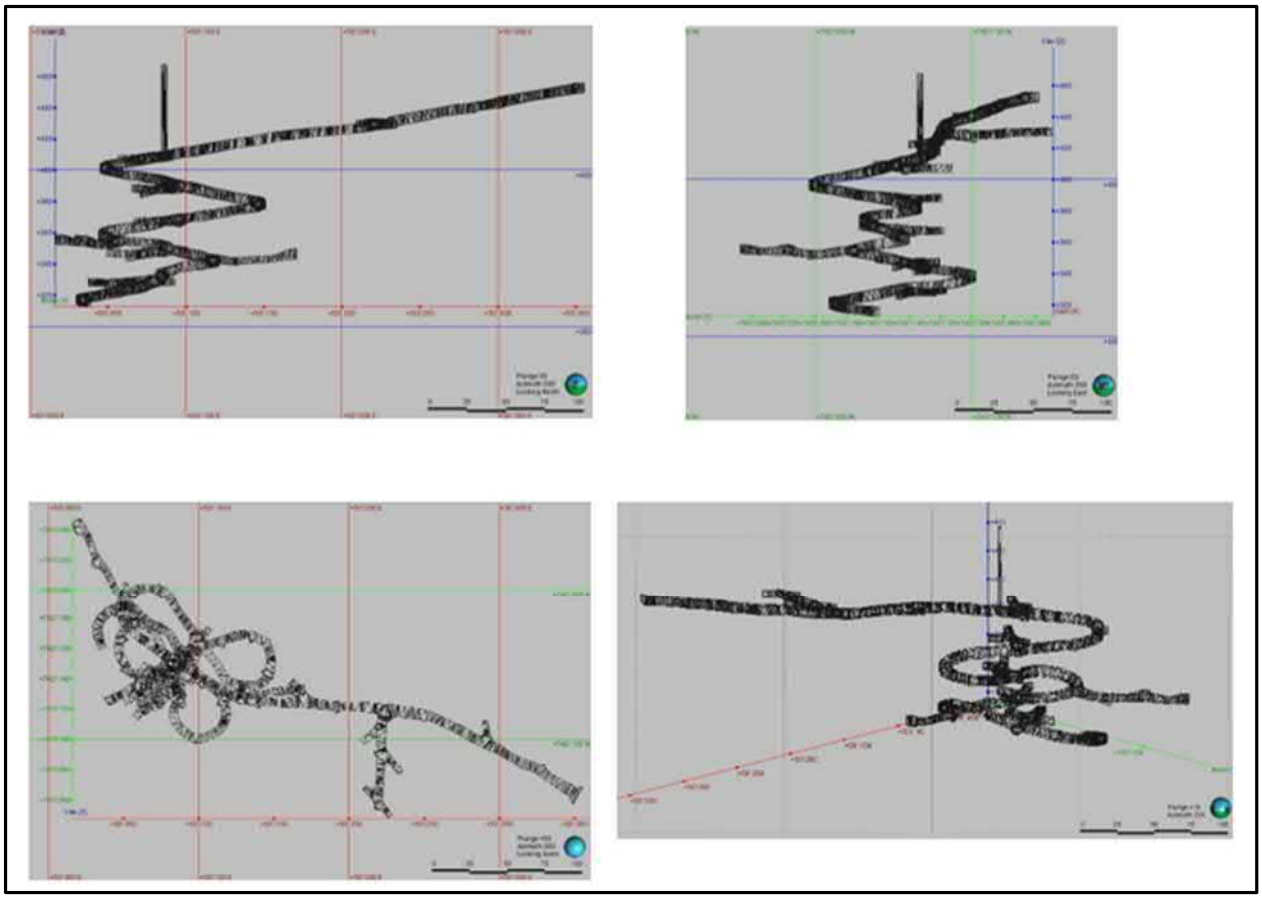


Figure 10. Underground development.

3.4.3 MINE SUMP

The Mine Sump, also referred to as the water retention pond, was established adjacent to the mine portal. Its purpose was to provide containment for the settling and sediment retention of water pumped from the mine decline ramp and the mine portal entrance. The 30 × 50 m sump was built above ground and is lined with a geomembrane; portions of the berm were constructed using mineralized rock. This sump was used periodically during camp operations for containment of sewage treatment plant effluent.

In 2019 a mixture of ore material and waste material was moved from the ore pad to a location up slope of the Mine Sump. In 2020 the ore/waste material was partially deposited into the Mine Sump with the remainder spread level above the Mine Sump.

During the exploration seasons 2021, 2022 cuttings from the core saws were deposited in the Mine Sump. During the 2023 exploration season some drill core that was previously stored cross piled near the upper

camp road and was found to be unrecoverable due to lack of labels and meterage markers and was placed into the Mine Sump.

The addition of rock material into the Mine Sump has potentially jeopardized the integrity of the sump liner with a suspected tear in the linear high on the south wall.

3.4.4 ORE AND WASTE ROCK PADS

Approximately 2,227 tonnes of ore were stockpiled at the ore pad from the 1996/1997 underground program (Tansey 1997); a resulting 750 kg bulk sample was recovered in 1996 for metallurgical test work at Lupin. The preceding owner reported that 1,738 m^3 (3,358 tonnes assuming a specific gravity of 1.93 tonnes per m^3) of ore was relocated to a stockpile between the portal and the mine sump in 2019. The discrepancy in ore volume between the previous reports is noted, Blue Star assumes the greater value for the progressive reclamation work planning.

Approximately 126,900 tonnes of waste rock were extracted from the underground workings (BGC *et al* 2005). The waste rock was used to construct the ore pad, and to expand the camp pad and portal pad; it is estimated that approximately 5,000 m^3 of waste rock is stockpiled on the portal pad. The pads were mostly capped with a thin layer of esker material to provide a base for infrastructure construction and material laydown. Development waste rock was also backhauled to Camp 3 area for use as riprap. The location and volume of waste rock at Camp 3 is unknown although numerous locations of waste rock are notable along the road.

In 2020 the ore/waste material was partially deposited into the Mine Sump with the remainder spread flat above the Mine Sump.

3.4.5 ROADS AND AIRSTRIP

A network of roads (14 km), constructed from material sourced from the esker borrow pit and locally armored using waste rock, connect the Ulu camp and portal area with the airstrip (1,300 m long) and Camp 3 as shown on Figure 3. Culverts were installed in the road to provide unrestricted flow to the drainage courses during spring melt and precipitation events. Silt fences were placed below the culverts by the preceding owner to provide sediment control. Silts fences are re-established on an annual basis as needed.

Road repairs were documented by the preceding owner however the type of rock used for the repairs was not. In 2021 Blue Star replaced two sections of road, one section on the Camp 3 road, and the other at Culvert 6. It appeared that mineralised waste rock may have been used in prior repairs which increased the risk of acid generation in areas of contact water. The road sections were replaced with clean esker material from the quarry. Silt fences were placed to provide sediment control.

3.4.6 ESKER BORROW PIT

The esker borrow pit (quarry) used for the road, airstrip, and final grade on the camp pad is located near Camp 3 at Reno lakes. This material has also been used as void filling and interim and proposed final cover of the non-hazardous waste landfill and will be used for interim cover of PAG rock.

3.4.1 NON-HAZARDOUS MATERIAL LANDFILL

An approved non-hazardous waste landfill was established in 2021. Non-hazardous waste materials from previous operators were dismantled, cut, crushed, depolluted, or otherwise prepared and placed in the approved area. Voids in the material and between placements were filled with clean esker sands from the esker borrow pit (SRK, 2022b). Subsequently, in 2024 and 2025 a small volume of additional non-hazardous waste from previous operators was depolluted and placed in the landfill and is documented in a draft of the Ulu Landfill Construction Report (SRK, 2022b, Appendix C).

3.4.2 WASTE, CHEMICAL AND SEWAGE STORAGE AREAS

The preceding owner demolished unused facilities and stockpiled them in preparation for disposal at the portal entrance, as illustrated in Figure 4. Blue Star has licenced and created a non-hazardous waste landfill that does not compromise the underground workings, as outlined in the *Landfill Management Plan*. The preceding owner backhauled oil/waste oil and hazardous waste offsite. The existing inventory of fuel and waste oil at the time of acquisition included 16 totes and 217 205-litre drums, based on the number of totes and drums observed on site by Blue Star in July 2019. The volume of hazardous waste is estimated to be 70 m^3, assuming the totes and drums are full. The volume does not include the waste oil/fuel that is expected to be drained when decommissioning equipment. These wastes were backhauled as part of the 2020 and 2021 work programs. All wastes generated during exploration activities are managed and backhauled according to the Project authorisations.

The preceding owner excavated the PHC contaminated soil at the Camp 3 fuel tank farm following the demolition of the facility. Approximately 1,220 m^3 of PHC impacted soil was transported to the Ulu Camp tank farm and stockpiled into the area that had previously held the fuel tanks, the current Soil Storage Area. This material was subsequently split into piles (Stearman, 2020) and that material that met surface and sub surface re-use criteria was used as void fill in the 2024 landfill placement.

4.0 RECLAMATION PLANNING

4.1 APPROACH TO PLANNING

The ICRP further develops the measures and methods previously approved in the preceding interim closure plan iterations for the Project. Since early 2019, Blue Star has undertaken, and continues to undertake, work with the landowner, the Kitikmeot Inuit Association ("KIA"), to understand the KIA's interests regarding land use in the Ulu area. The aim is to scope and refine the proposed progressive reclamation measures, allowing for the continued use of the Ulu site for exploration-related activities while preserving the site's future mining potential. In support of developing a mutual understanding of the site and a path forward on planned site activities, a coordinated site visit was undertaken in 2019 prior to commencing the water licence assignment process, and collaboration among the KIA's and Blue Star's technical advisors is ongoing, which includes the development, regular reviews and revisions of this Plan.

4.2 ROLES AND RESPONSIBILITIES

Blue Star is responsible for activities associated with the Project, including implementation and management of this Plan. Blue Star's contact information is provided below.

Blue Star Gold Corp.

Suite 507-700 W. Pender Street
Vancouver BC V6C 1G8
Phone: 1 778-379-1433

Contact: Darren Lindsay, Vice President of Exploration
Phone: 1 778-379-1433
Email: d.lindsay@bluestargold.ca

4.2.1 STAFF, CONTRACTORS, SUPPLIERS AND VISITORS

All personnel conducting activities on site, including staff, contractors, suppliers and visitors, are required to be guided by this Plan as it pertains to their activities on site. Specifically, these responsibilities include:

- Taking all necessary steps to minimize negative effects to water, land and air;
- Cooperating fully with your supervisor and/or Blue Star management to implement an environmental protection program in your work area;
- Only carrying out duties and tasks that you are experienced at and trained to perform;
- Where there is uncertainty, asking questions and bringing concerns to the attention of your supervisor when working with products or conducting tasks that may pose potential environmental risks;
- Reporting wildlife observations, spills and emergency situations in accordance with relevant management plans.

4.2.2 MANAGERS AND SUPERVISORS

Managers and supervisors have a responsibility to ensure that staff, contractors, consultants and visitors have been trained in Blue Star procedures. Additional supervisor and manager responsibilities include:

- Maintaining a no blame work environment in implementing mitigation measures and follow-up actions;
- Ensuring site-, task- and material-specific training is provided to all departments and staff;
- Ensuring there are appropriate and sufficient supplies on site to support implementing mitigation measures and follow-up actions;
- Providing assistance in responding to environmental hazards;
- Maintaining records regarding inspections, personnel training, equipment testing and maintenance and decommissioning;
- Ensuring compliance reporting is undertaken in a timely manner; and
- Engaging with relevant parties in a timely and transparent manner, where appropriate.

4.2.3 RECLAMATION MANAGER

In addition to the responsibilities listed above the Reclamation Manager is responsible for:

- Overseeing soil and waste handling, transport, sampling, and management;
- Day-to-day oversight of all related reclamation efforts;
- Coordinating with other managers and supervisors to ensure safe and appropriate allocation of resources on site; and
- Maintaining the reclamation schedule, and where schedule changes occur, advising the Project Manager in a timely manner.

4.2.4 DRILL CONTRACTORS

Drill contractors are responsible for ensuring each drill site is cleaned up to the satisfaction of a Blue Star inspector following each drill move and prior to commencing drilling at a new drill target. Closure-related activities to be undertaken include:

- Removing all drill timbers, hoses, equipment, debris and garbage from the drill site;
- Cut drill stems and anchors flush with the ground surface;
- Cap or plug drill holes;
- Backfill flush with the ground surface any areas that may have eroded or subsided around the drill stem;
- Remove to a sump any drill cuttings that may have been spilled to the surrounding land;
- Ensure cuttings sump is stable;
- Implement erosion control measures where necessary.

4.3 STATUS OF PLANNING

4.3.1 PAST CLOSURE PLANNING

Blue Star has reviewed the previous closure and reclamation (previously referred to as abandonment and restoration) plans filed with the Nunavut Water Board (NWB) and the historical water licences associated with the property. Blue Star notes that the content of the plans has changed little since 2001. Several studies were undertaken in support of the environmental assessment of the Project (Nunavut Impact Review Board file # 99WR055) and of the development of the initial interim closure plan submitted to the NWB; these include, but are not limited to, the following documents:

- Ulu Project: Preliminary Assessment of Acid Rock Drainage Potential, Klohn-Crippen Consultants Ltd., October 1996.
- Fisheries Assessment of Streams and Lakes in the Ulu Project Area, RL&L Environmental Services Ltd., November 1996.
- Notes on Wildlife in the Vicinity of the Echo Bay Mines Ulu Project and Associated Transportation Corridor, Hubert and Associates and Canamera Geological Ltd., August 1996.
- Wildlife and Wildlife Habitat Assessment, Canamera Geological Ltd., Environmental Resources Division, November 1996.
- Ulu Mine Project Archaeological Impact Assessment: Phase I, Quaternary Consultants Ltd., July 1996.
- Ulu Mine Project Archaeological Impact Assessment: Phase II, Quaternary Consultants Ltd., September 1996.
- Land-Cover and Vegetation of the Ulu Site and Ulu/Lupin Winter Road, Nunavut, Canada, Institute for Advanced Field Education Ltd., January 1998.
- Kinetic Testing of Sulfide-Rich Material from Ulu, Klohn-Crippen Consultants Ltd., April 1998.
- Baseline Aquatic Studies Program in the Ulu Project Area, Nunavut, RL&L Environmental Services Ltd., May 1998.

The following studies were undertaken by Wolfden in anticipation of resuming underground activities at the site:

- Hydrological Assessment of West Lake, Gartner Lee Limited, May 2006.
- Preliminary Baseline Water Quality Assessment – Ulu, Gartner Lee Limited, February 2005.
- Review of Field Column Kinetic Test Data, Mehling Environmental Management Inc., December 2004.

4.3.2 CURRENT CLOSURE PLANNING

It is understood that a body of work, which includes baseline environmental studies, was undertaken at Ulu from 2004 to 2006; however, this information was not available for informing this Plan. Blue Star is in the process of obtaining access to those data.

Closure, abandonment, and restoration of a mine is the final stage in the life cycle of a viable mining operation and the decision for final closure comes after careful consideration of all other options available.

Closure planning for mining projects is best understood as a continuum that evolves from a basic conceptual level during pre-production stages towards detailed designs as facilities are completed and as-built details are available for consideration in closure designs. The level of closure planning detail and the timelines to complete closure activities vary with the development of the different components of the site.

In the late 1990s, the Project was in an advanced stage of exploration, given its ability to provide mill feed to the Lupin Mine. Since the Lupin Mine owners sold their interest in the Project in 2003, the Project has transitioned from exploration to near feasibility and back to exploration again as discussed in Section 2.2. Until 2017, reclamation and closure planning did not advance to recognize the change in the status of the site.

This ICRP revision considers the *Interim Closure and Reclamation Plan* for the Ulu Exploration Project (Bonito, 2013 [NWB approved], 2016 [not approved]) and the *Ulu Project – Progressive Reclamation Workplan* (Bonito, 2018 [not approved]) prepared by the previous site operators and the *Interim Closure and Reclamation Plan – Ulu Gold Project*, 2020 [NWB approved] and the *revised Interim Closure and Reclamation Plan – Ulu Gold Project*, 2021 [not approved]. This revised version of the ICRP presents Blue Star's progressive activities undertaken since the last approved ICRP and its approach to progressive reclamation required to return the Project to a scale appropriate for exploration activities which has been developed through discussions with the KIA. Activities listed in Section 2.4 are assumed to be completed; their status have been confirmed by Blue Star to the best of its ability.

4.4 COMMUNITY ENGAGEMENT SUMMARY

Blue Star has undertaken a number of engagements since early 2019 on matters relating to both specific aspects of its operation in Nunavut as well as general aspects relating to its current and future planned activities in the region, including reclamation and exploration at the Ulu site.

Through the property acquisition process and the related licence assignment processes, Blue Star worked closely with the KIA and the Government of Canada to develop a mutual understanding of the current conditions at Ulu and Blue Star's near-term plans for the site. As the acquisition of the Project did not conclude until January 2020, Blue Star was unable to formally engage with the public on specific aspects of Ulu interim closure planning until after this time. Since the acquisition of Project, Blue Star has met with the KIA in person several times and has dialogued with stakeholders over email and by phone. Public meetings planned for Kugluktuk and Cambridge Bay in 2020 were postponed in response to a pandemic however were undertaken in mid-March 2023. The Company endeavours to have at least annual meetings in Kugluktuk and Cambridge Bay.

In addition to participation in the public processes administered by the Nunavut Planning Commission, the Nunavut Impact Review Board (NIRB) and the NWB, Blue Star commits to upholding its *Engagement Plan*.

4.5 ALTERNATIVES ASSESSMENT

In the process of planning the progressive reclamation strategies for the Project and during this revision of the plan, several tools, techniques, and methodologies were utilized with the following goals:

- Examine possible alternatives to reclaim project components.
- Determine which alternatives are best suited to the site, the desired near-team closure objectives, future long-term closure objectives, and end land use.

This included the following assessments:

- Landfill needs and location options.
- Management options for PHC contaminated soil and rock.
- Management options for potentially acid generating rock.
- Analysis of various liner systems for the soil treatment facility.
- Analysis of various cover material options for PAG rock.
- Planning for future rock quarry development.

4.6 RECLAMATION RESEARCH

Reclamation research will be an ongoing component of Blue Star's closure planning process and will focus primarily on the key closure measures proposed for the site, both in the near term and long term. This research will include the following topics:

- Material suitability for landfill erosion covers.
- Material suitability for PAG/AG rock management barrier covers.
- Rock quarry assessments.
- Ore and waste rock management.

5.0 OBJECTIVES & DESIGN CRITERIA

5.1 OBJECTIVES

Closure principles guide the selection of closure objectives. Four core closure principles are applicable to advanced mineral exploration and mine sites: physical stability, chemical stability, no long-term active care requirements, and future use (including aesthetics and values) ensuring future generations of Inuit will be able to enjoy the land as Inuit do today (MWLWB/AANDC 2013; NTI 2008).

Blue Star considers the overarching objectives of NTI's *Reclamation Policy* (2008) applicable in this context which include:

- Establishing goals for the reclamation of Inuit Owned Lands (IOL) and setting out the obligations of the land user.
- Minimizing the environmental liability to Inuit from the use of IOL.
- Ensuring that reclamation requirements are incorporated in a reclamation plan.
- Integrating Inuit Qaujimajatuqangit and consultation with Inuit into the reclamation process.
- Maximizing the benefits of reclamation to Inuit.

5.1.1 PROGRESSIVE RECLAMATION GOAL AND OBJECTIVES

Blue Star wishes to continue exploration and undertake progressive reclamation to return the site to a condition reflective of the currently intended level of exploration activity, yet supportive of potential future mine development. In consideration of the closure principles of advanced mineral exploration sites, the near-term closure and reclamation objectives are the following:

- Stabilize the site through progressive reclamation and ensure environmental protection to the extent necessary to minimize liability to Inuit, and yet support the continued use as an exploration site allowing for future development of a mine and mine-related infrastructure and benefit to Inuit.
- Ensure that there is no danger to the health or safety of people and wildlife.

5.1.2 TEMPORARY CLOSURE GOAL AND OBJECTIVES

Temporary closure, or a planned shutdown, is considered a short-term event and the result of seasonal, economic, or regulatory requirements. The Project is expected to temporarily close seasonally, between periods of exploration and progressive reclamation activities. The goal for temporary closure is to maintain the site for future exploration and progressive reclamation activities. The objectives for temporary closure are to ensure that:

- No danger to the health or safety of people and wildlife is posed over the reasonably foreseen closure period.
- Degradation of the site facilities is minimized.
- Monitoring required under the various authorizations may be undertaken to enable implementation of adaptive management measures and fulfillment of compliance obligations.

5.1.3 PERMANENT CLOSURE AND RECLAMATION GOAL AND OBJECTIVES

Permanent closure and reclamation of the site occur at the end of mine life, when economic ore reserves have been exhausted or a decision has been made to place the mine on care and maintenance or a decision as been made to abandon the site. Objectives of permanent closure are the following:

- Ensure that no danger is posed to the health or safety of people and wildlife.
- Ensure the requirements for long-term maintenance and monitoring associated with all of the site facilities are minimized.
- Ensure contaminant loadings to the environment from the closed facilities are minimized or prevented.
- Ensure the site and affected areas are returned to a condition that is compatible with the surrounding original undisturbed area with respect to its future potential/productivity uses.

5.1.4 ADAPTIVE MANAGEMENT

Adaptive management is an approach to environmental management that, according to the NIRB's *Technical Guide Series, Terminology and Definitions* (2018), is a systematic and ongoing decision-making process that, when uncertainty exists, aims to reduce that uncertainty over time and is well suited to mine closure planning, given the long-term planning horizon and associated uncertainty. Adaptive management is precautionary in nature and allows for contribution of improved science to the development of robust mitigation measures. A key characteristic of adaptive management is monitoring, which is used to advance scientific understanding and to adjust management policies in an iterative process. Embedding adaptation into closure planning involves thinking about how the results of monitoring will change planned management actions.

Adaptive management planning identifies actions needed when a predetermined threshold is met or triggered, and allows for performance monitoring and project re-evaluation in the future. Risk triggers provide progressive decision points that identify how and when management action should be taken. At a high level, adaptive management may include the following steps:

- Identifying risk triggers associated with vulnerabilities or uncertainties.
- Quantifying impacts and uncertainties.
- Evaluating strategies and define an implementation path that allows for multiple options at specific triggers.
- Monitoring the performance and critical variables in the system.
- Implementing or re-evaluate strategies when triggers are reached.

5.2 DESIGN CRITERIA

Design criteria are presented in design documents appended to the respective facility management plans. The information in this section is provided for summary purposes only, the design documents stand alone and take precedence. No updates to design diagrams submitted as part of the *Interim Closure and Reclamation Plan – Ulu Gold Project*, 2020 [NWB approved].

5.2.1 LANDFILL COVER DESIGN

Design criteria for final cover on the non-hazardous waste onsite landfill (the Landfill) include but are not limited to the following parameters:

- Maximum side slopes of 4H:1V.
- PHC concentrations of material placed within the Landfill shall not exceed the CCME 2008 guidelines (Table 8).
- Minimized surface run-off through the area during operations and post-closure.
- Drainage gradient of the Landfill's outer surfaces post-closure shall not be less than 1%.

5.2.2 SOIL TREATMENT FACILITY

The design criteria for the soil treatment facility (STF) includes, but is not limited to, the following features:

- Average height of soil undergoing active treatment will be no greater than 1.5 m.
- Floor of each cell will be sloped at a minimum slope of 1% towards a sump.
- Each cell will be accessed via access ramps sloped at 5H:1V.
- Each cell shall be lined with a low permeability liner with a hydraulic conductivity of less than 1x10-7 cm/s.
- Minimum 0.5 m freeboard, based on the capacity to store a 24-hour 10-year frequency storm event and on the average annual snow accumulation using a 10:1 ratio.
- Berms will have a minimum height of 1.5 m.
- Inner berm slopes of 2H:1V and outer berm slopes of 1.5H:1V.
- Located greater than 500 m from sensitive areas.
- Located on a site with slope less than 5%.
- Groundwater table must be greater than 1 m from the base of the facility.

5.2.3 PETROLEUM HYDROCARBON CONTAMINATED SOIL REMEDIATION

The soil quality remediation objectives for PHC fractions F1 to F4 (Table 9) are based on the Government of Nunavut's *Environmental Guideline for Contaminated Site Remediation* (2009) Tier 2 guidelines for:

- Wildland land use.
- Relevant exposure pathways.
- Coarse-grained soils. Selection of the remediation objectives based on future land use and the exposure pathways present at the site is described in the 2024 contaminated soil investigation report (Appendix B).

5.2.4 POTENTIAL ACID GENERATING AND ACID GENERATING ROCK MANAGEMENT

There is not yet a design document for managing these rocks. Blue Star has noted that most of the waste rock used has the potential to become acid generating and has been undertaking research to determine best management paths for this material. The Company's consultants are in the process of refining options to manage the rock and draft a management plan for this rock including design criteria for any facility required to deal with this material. Once prepared the management plan will be appended to this ICRP.

Table 9. Soil quality remediation objectives for petroleum hydrocarbons.

Objectives for Coarse-Grained Soils	F1 mg/kg	F2 mg/kg	F3 mg/kg	F4 mg/kg
Surface (0 to 1.5 m depth)	210	150	300	2,800
Subsoil (>1.5 m depth)	700	1,000	2,500	10,000

Source: CCME 2008
Note: "Coarse" means coarse-textured soil having a median grain size of >75 µm

6.0 PROGRESSIVE RECLAMATION MEASURES

6.1 DEFINITION OF PROGRESSIVE RECLAMATION

Progressive reclamation takes place prior to permanent closure, and is the reclamation of components and/or decommissioning of those facilities that no longer serve a purpose. These activities can be completed concurrently with exploration activities at the site, utilizing available resources to reduce future liability, minimize the duration of environmental exposure, and enhance environmental protection. Progressive reclamation may shorten the time for achieving the future final closure objectives and may provide valuable experience on the effectiveness of certain measures that may be implemented during permanent closure.

6.2 OPPORTUNITIES FOR PROGRESSIVE RECLAMATION

Blue Star's approach to progressive reclamation is to utilize the operable equipment available at site to dispose of non-useable equipment and materials in the Landfill and to manage PHC contaminated soil in the STF. Blue Star plans on using the following equipment that is available on site:

- Excavators;
- Belly-dumper;
- Telehandler;

- Ore truck(s);
- Bulldozer with ripper;
- Skidsteer with skidvac attachment;
- Grader;
- Packer;
- Light vehicles for transport including bus.

Blue Star has mobilised annually since 2020 to the Ulu camp site. The initial year saw a significant number of person-days spent on evaluating and repairing equipment in addition to better understanding the site status. In 2021 a significant dedicated crew of 8-10 people were utilised to maintain and repair equipment required for progressive reclamation and camp operations as well as construct the initial phase of the non-hazardous landfill. An environmental technician was allocated from the exploration group on a part-time basis to undertake regular monitoring and compliance sampling and regular site evaluation tours. During subsequent exploration programs camp operations workers were seconded to undertake progressive reclamation activities as time allowed from their camp duties. This approach has kept key equipment operating, completed soil aeration, completed equipment depollution and dismantling, completed landfilling, undertook evaluation of methodologies for interim PAG rock management, and supported additional research and sampling activities.

In 2025 Blue Star has mobilised a belly-dumper, excavator, telehandler and skidvac to reduce pressure on aging equipment and operate more efficiently with higher equipment availability (less maintenance downtime).

6.3 MINE WORKINGS

The vent raise was backfilled with waste rock and esker sand by the preceding owner; documentation verifying that the work was certified by a qualified engineer has not been provided by the preceding owner. In 2018 Stantec provided a report, *2018 Ulu Project Geotechnical Inspection,* dated 13 November 2018 that confirmed the owner at the time backfilled the vent raise (Section 3.2 Ulu Camp), no recommendation was made for further actions on the vent raise. No subsidence or other indications of potential failure have been noted; the current cover appears to be stable. The vent raise backfill will be monitored during progressive reclamation activities and observations included in the annual reports. As long as the vent raise remains stable the Company believes there is no additional measures to be taken until a final closure plan is required.

The mine portal has been blocked to prevent access by the previous owner; two sea cans were placed in front of the portal to restrict access. The portal will be monitored during progressive reclamation activities and observations included in the annual geotechnical inspection report.

The steel recovered from the demolished fuel tanks is thought to be appropriate for steel closure of mine entrances; however, the dimensions of the remaining intact sheets are unknown. Scrap steel has been set aside for possible reuse. Steel not re-purposed is to be landfilled prior to the cessation of progressive reclamation activities. For the purposes of the progressive reclamation security estimate (Appendix C), it is assumed the vent raise and mine portal are stable and do not require any additional undertakings until final closure.

6.4 MINE SUMP

The mine sump, also referred to as the retention pond, in the interim will have any high priority PAG rock removed from its berm walls replaced with clean esker sands and will be decommissioned as part of the long-term PAG rock management plan currently in development. The geomembrane liner will be removed and disposed of in the Landfill or backhauled for appropriate disposal.

6.5 ORE AND WASTE ROCK

The ore and waste rock stockpiled on surface or used within infrastructure construction (retention pond berm, core laydown area, ore pad) has the potential to generate metal leachate and acidic rock drainage within the next decade. Studies undertaken have better defined time to acid generation with field research indicating some areas with accelerating acid generation potential. Ore placed above the mine sump was initially considered higher risk however it appears to be slightly more stable than some of the mineralised waste rock. As of 2023/24 studies the Company has committed to the development and implementation of a long-term management plan for these problem rock types. Total estimated rock volumes based on historical records approximately 67,500 m^3. Studies have included sampling, laboratory analysis, pH monitoring and water monitoring and reporting of findings with recommendations. The following options are being considered:

- Thermal cover with barrier cover in place;
- Relocation with barrier cover;
- Relocation and neutralization with non-barrier cover;
- Relocation and neutralization with barrier cover.

The ore remaining stockpiled above the Mine Sump and placed within the Mine Sump will be managed with PAG waste rock.

The NWB will be notified 30 days prior to the implementation of the selected option, or as otherwise stipulated under the water licence. Management of the ore stockpile will be undertaken during progressive reclamation activities. As of the date of this revision a ML/ARD waste rock management plan is being developed, in the interim all previously collected PAG and high priority PAG (SRK, 2023) is being placed in an interim storage pile on the Ore Pad and covered with esker sand with the pulled-back areas covered with limestone and sand as per guidance provided (SRK, 2025).

All areas where waste rock was used as a construction material will be reviewed regularly for early determination of ML/ARD risk and managed according to the defined management plan.

During 2025 a proof-of-concept approach was undertaken to managing Priority 1 PAG waste rock by undertaking the excavation and interim piling of PAG rock from the north side of the ore pad (West Lake drainage) to the centre of the ore pad. A vacuum system was used to collect fine materials. Exposed tundra and any unrecoverable materials were covered with limestone 2 kg/m2 and then covered with a minimum of 0.5 m sand (SRK, 2025); the piled PAG rock was covered with at least 0.5 m of sand.

The Interim pile now consists of material removed from the Camp 3 Road, Culvert 6 and now the north side of the ore pad (West Lake drainage). The interim pile contains approximates 5,000 m^3 of material; not all of this material has ben confirmed as at-risk material since it includes all the rock from the West Lake drainage side of the ore pad.

6.6 INFRASTRUCTURE AND EQUIPMENT

6.6.1 BUILDING DEMOLITION

With the possible exception of the core shack and the arctic corridor, all buildings at the Project are collapsible and are designed to be dismantled easily. Blue Star has assessed the condition and usefulness of the buildings on site to support future exploration. Anything deemed no longer useful, irreparable, or unsalvageable has been or will be disposed of in the Landfill. For the purposes of the security estimate, it is assumed that the arctic corridor will be disposed as waste backhaul when the camp is relocated. If it is determined the camp does not need to be relocated in the near future, then the arctic corridor will be left in place after the closure of the Landfill; when needed the Landfill may be re-opened to accommodate the decommissioning of the arctic corridor.

6.6.2 EQUIPMENT DEMOLITION

Much of the existing equipment and parts found on site are no longer useful, are in a mature state of disrepair, or are completely decommissioned. Accordingly, Blue Star considers this equipment suitable for disposal in the Landfill. Prior to disposal, all fluids, batteries, and mercury switches will be removed from the equipment. If air conditioners are present, they will be checked for refrigerants which will be removed by approved personnel prior to dismantling. A portion of the originally listed equipment at site has been depolluted by KEL Environmental Ltd and disposed in the landfill. Table 10 lists the equipment at site, its perceived usefulness in exploration and reclamation activities and its currently recommended path for disposal. Salvageable equipment will be retained and transferred for use and storage when an exploration camp is established closer to the airstrip.

Table 10. List of equipment at site, usefulness and recommended path to disposal.

Make	Model	Description	Up	Down	Ops Nessessity	Disposal Method
Case	SR200	Skid steer	x		x	Backhaul via air
Frost Fighter	OHV-500	Heater	x		x	Backhaul via air
Lincoln	400D	Welder	x		x	Backhaul via air
Le Roi	HQ375	Air compressor	x		x	Backhaul via air
Caterpillar	CS-956	Packer	x		x	Backhaul via land road
Caterpillar	311	Excavator	x		x	Backhaul via land road
Caterpillar	966D	Loader	x		x	Backhaul via land road
Peterbilt	357	Tri axle truck	x		x	Backhaul via land road
Caterpillar	769C	Haul truck	x		x	Backhaul via land road
Kubota	M5400	Tractor w/ cab	x			Backhaul via air
Detroit	523	600V generator	x			Backhaul via air
Caterpillar	D8N	Dozer	x			Backhaul via land road
Caterpillar	14G	Grader	x			Backhaul via land road
Caterpillar	769C	Haul truck		x		Backhaul via land road
Caterpillar	988B	Loader		x		Backhaul via land road
Ford	D600	20 Pax bus	x			Backhaul via land road
Caterpillar	3512	600V generator	x			Backhaul via land road
Volvo	13 speed	Water truck	x			Backhaul via land road
Formost	Commander	Swamp floater	x			Backhaul via land road
Wagner	MT 333	Mine dump truck	x			Backhaul via land road
Wagner	ST 75Z	Mine scoop	x			Backhaul via land road
Elphinstone	R1700	Mine scoop	x			Backhaul via land road
Ford	F350	Pickup		x		Landfill
Ford	F350	Pickup		x		Landfill
Ford	F350	Pickup		x		Landfill
Wagner	MT 444	Mine dump truck		x		Landfill
NC Machinery Co.	RB 322	Jumbo drill		x		Landfill
Tamrock	T10	Jumbo drill		x		Landfill
Gardner-Denver	D825	Air compressor		x		Landfill
Caterpillar	D800	Air compressor		x		Landfill

6.6.3 *WASTE STORAGE AND DISPOSAL AREAS*

The Landfill, a new waste management facility, was constructed in 2021, operated, and will be closed during the progressive reclamation work program. The Landfill will have the capacity to receive approximately 20,000 m^3 of non-hazardous solid waste. It has received to date 9,200 m^3 of non-hazardous waste (SRK 2022b) and 250 m^3 in 2024,and 90 m^3 in 2025 leaving approximately 10,000 m^3 for the remainder of the identified non-hazardous waste. Its location, illustrated on Figure 5, occurs in an area situated between the former Ulu Camp tank farm and the portal access road. It is also situated in proximity to all consolidated waste stockpiled by the previous site operator in 2018/2019. The Landfill is intended to operate during progressive reclamation activities as described in the *Landfill Management Plan*. Details of the Landfill design and engineering drawings are included as an appendix to the *Landfill Management Plan*.

6.6.4 *FUEL STORAGE*

Fuel will be stored in fuel caches. Oil, lubricants, and coolant will be stored within secondary containment.

6.7 HAZARDOUS MATERIALS AND CONTAMINATED SOIL

Hazardous materials and domestic waste generated during progressive reclamation will be handled in accordance with the *Waste Management Plan*. This will include fluids recovered when equipment is decommissioned, and fluids generated when fuel tanks and drums are decontaminated (if needed).

PHC contaminated soil is to be excavated and the resulting floor and sidewalls of the excavations are to meet the soil quality remediation objectives (Table 9). The remediation confirmatory sampling procedure is provided in Appendix B of the *Soil Treatment Facility Management Plan*.

An STF will be constructed and operated to remediate PHC contaminated soil in accordance with the *Soil Treatment Facility Management Plan*. As of the date of this revision the estimated volume of material requiring treatment is 20-25% the original estimated volume; this volume can be managed with in the existing soil holding area (old tank farm) which is a lined facility. As an interim measure prior to STF construction, if required, PHC soils will be excavated and deposited in the soil holding area and aerated and sampled annually. These materials, if they meet re-use criteria (Table 9) may be used as void fill in the landfill or other subsurface re-uses. Soil treatment will use naturally occurring micro-organisms contained in the soil and volatilization to break down PHC in what are known as biopiles. Nutrients and water will be added, and the soil aerated to enhance microbial activity. The treatment of contaminated soil will be restricted to the warmer months when the soil is not frozen or covered with snow. The initial planned location for the STF, as identified in **Error! Reference source not found.**11, is no longer suitable and the location was required for an interim pile of PAG rock. Given the total volume of material to manage is a fraction of the initially estimated volume, a single cell of the designed STF is contemplated and is proposed to be constructed proximal to the originally proposed location. The security cost estimate is based on the schedule and quantity estimates in Table 11, taken from the latest KEL report (KEL 2024) and summarized in Appendix B.

The soil underlying secondary containment in areas used for equipment dismantling and fuel caches during progressive reclamation will be tested when the caches are removed, and any impacted soil will be recovered and treated in the STF or packaged and shipped off-site for treatment. The removal will be done through backhauling (utilizing the return flights of fuel and large item delivery) of the material to a treatment facility off site. The current estimate of contaminated material unsuitable for treatment in the STF and therefore requiring backhaul and off-site is estimated to be 20 m^3 (Stearman, 2020).

TSP piles meeting sub-surface reuse and surface re-use located with the Soil Storage Area were used as void fill in the landfill in 2024. Remaining material that formed the holding area berms was left in place while any material not meeting re-use criteria was spread across the bottom of the holding area to maximize aeration.

Soil depth to liner was estimated in 2025 to be 0.32 m on average; and space available in the holding area was estimated confirming the ability to accommodate all known PHC soils plus 50%.

Upon completion of the soil remediation activities Blue Star intends to assess the condition of and usefulness of the lined facility to be re-purposed to support future exploration. For the purposes of the progressive reclamation security estimate it is assumed the STF will only be 50% constructed and be decommissioned on closure.

Table 11. Soil treatment facility schedule and quantity estimates.

Year	Volume (m^3)	Comments
2	2,000	Placement of estimated volume for treatment within the soil treatment facility. Active season of material aeration.
3	-1,000	Remediated for removal.
4	-500	Remediated for removal.
5	-500	Remediated for removal.
6	To be confirmed	Repeated process based on the yearly remediated quantities and remaining PHC contaminated material.

6.8 BORROW AND QUARRY MATERIALS

Eskers have historically provided a source of aggregate for the Project. Disturbed areas will be rounded and contoured with a bulldozer to minimize erosion. This will involve walking/tramming the machine to and from camp.

Should a rock quarry be established and developed, it will be operated and closed in accordance with the *Borrow Pits and Quarry Management Plan*. Prospective quarry sites and the geochemical characterization program are described in the *Borrow Pits and Quarry Management Plan*.

6.9 MONITORING AND MAINTENANCE

6.9.1 PROGRESSIVE RECLAMATION MONITORING AND MAINTENANCE PROGRAMS

The performance of the backfill in the vent raise, the cover on the Landfill (and the cover on the interim PAG stockpile) will be monitored during progressive reclamation. Observations will be recorded in the annual geotechnical report and the annual NWB report.

Surface and seepage water monitoring will be undertaken in accordance with the water licence during seasonal camp opening and with the annual geotechnical inspection.

Regular inspections of the Landfill are to be conducted to ensure operational compliance and specifically following a rain event when the site is occupied. Surface water quality and Landfill cover performance are to be monitored as outlined in the *Landfill Management Plan*. Reporting and documentation requirements are provided in this plan.

The road and airstrip will be maintained as necessary to complete progressive reclamation activities. The progressive reclamation will extend for a period of 6 years; this will include the time required to complete the progressive reclamation work, remediate the remaining PHC contaminated soil, and achieve final closure of the Landfill and STF.

Monitoring of the STF includes: biopile PHC concentrations and moisture content, surface water accumulation, groundwater quality, visual inspections during operations, and annual geotechnical inspections as outlined in the *Soil Treatment Facility Management Plan*. Maintenance of the facility will be undertaken, along with reporting and documentation, as outlined in the *Soil Treatment Facility Management Plan*.

6.9.2 POST-PROGRESSIVE RECLAMATION MONITORING AND MAINTENANCE PROGRAMS

Upon decommissioning the STF, soil samples are to be taken and compared to baseline soil samples to confirm that there is no migration of contaminants into the foundation or surrounding area, as outlined in the *Soil Treatment Facility Management Plan*.

Landfill cover (and interim PAG rock cover and ore stockpile cover, if used) performance monitoring by a geotechnical engineer will occur in accordance with the water licence.

The post closure period is identified as 5 years and will include continued visual inspections, water quality monitoring, and geotechnical inspection.

6.9.3 CONTINGENCIES

A proposed schedule for undertaking the progressive reclamation activities is provided in Section 1.4. The proponent acknowledges that this may change in consideration of logistics and on-site conditions; however, the intent to carry out the work as licensed remains.

Should monitoring determine that the work as licensed not be a successful means of achieving progressive reclamation criteria and objectives, alternatives will be developed.

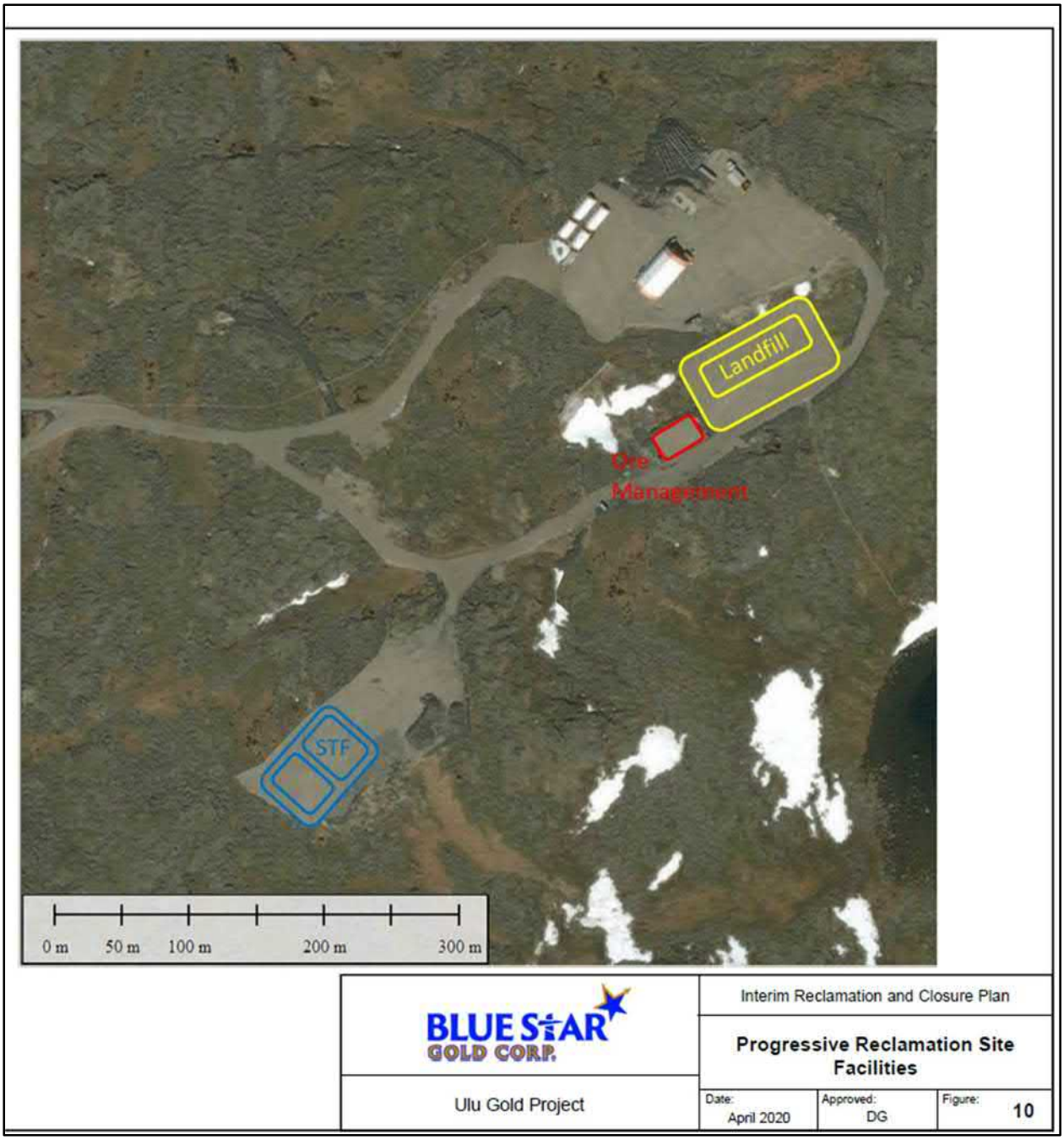


Figure 11. Previously proposed progressive reclamation site facilities.

7.0 TEMPORARY CLOSURE MEASURES

As described in Section 5.1.2, temporary closure of the site may occur for different reasons; however, related closure activities are the same regardless of the reasons for temporary closure.

Monitoring and administrative activities would continue to maintain all compliance requirements. At a minimum, annual site inspections will take place. Typical activities associated with temporary closure of each project component are outlined below.

7.1 MINE WORKINGS

The portal and vent raise will be inspected to ensure there are no areas of subsidence; control measures would be implemented if necessary.

7.2 WATER MANAGEMENT

The water intake hose will be removed from the lake and securely stored on site. The water pump will be drained, and the pump placed into storage.

Site drainage patterns will be inspected, and sediment control features upgraded where necessary.

7.3 BUILDINGS AND STORAGE FACILITIES

7.3.1 ULU CAMP

Temporary camp closure is expected to take approximately three days, using available on-site labour and supervision.

Most consumable supply inventories would be brought to a minimum through scheduled use, reducing the risk of long-term storage at the site. Valuables will be removed from camp to off-site storage. Remaining items key to the closure and start-up of the camp will be secured inside the Weatherhaven residential complex.

The rooms, kitchen, and dry in the residential complex will be cleaned out, fuel disconnected, and doors wired shut to prevent snow and wildlife ingress. All food will be removed to off-site storage. The kitchen will be emptied and cleaned, including the grease traps, so as not to attract wildlife. A small amount of non-perishable food may be left on site in the core shack, as emergency rations.

The greywater sump will be inspected to ensure it is free from wildlife attractants. Erosion control measures will be implemented where necessary.

The doors and windows of the core shack will be boarded to prevent snow and wildlife ingress. Core storage areas will be inspected for stability. The incinerator and surrounding area will be cleaned out, ash and debris removed in accordance with the *Waste Management Plan*, and the incinerator secured in such a manner as to prevent snow ingress into the chambers and wildlife attraction.

7.3.2 FUEL AND MATERIAL STORAGE

Fuel and other materials such as drill additives, lubricants, and coolants may remain in fuel caches and inside secured sea containers for emergency use and to support camp closure and start-up. All barrels and

other storage containers will be inspected to ensure integrity. Fuel remaining in caches will be covered with tarps.

7.4 MOBILE EQUIPMENT

The remaining operational vehicle fleet will be parked inside the vehicle repair shop (when present) with appropriate catchments placed below the vehicles. Batteries will be removed and liquids drained from key pieces of equipment and moved to off-site storage. A skidsteer is to be stored in a sea container at the airstrip over winter to assist in camp opening and temporary closures.

7.5 WASTE MANAGEMENT

Hazardous and domestic waste generated during the season will be managed in accordance with the *Waste Management Plan*.

7.6 DRILLS

Drills will be demobilized from the field and stored in a designated area on site if they are kept on site. Fuel lines will be disconnected, and fuel tanks stored in secondary containment and covered. Drill cuttings sumps will undergo a final inspection to ensure proper containment and erosion control. The area around drill stems will undergo a final inspection to ensure any areas of subsidence have been backfilled in such a manner as to prevent water accumulation.

7.7 MONITORING AND MAINTENANCE

Site components and infrastructure will be visually inspected at least annually and in accordance with the applicable authorizations. The visual inspections will document unexpected conditions as they relate to protection of health, safety and the environment, physical stability, and security. Blue Star management will be notified of all unexpected conditions; these will be investigated and addressed as required. In general, all monitoring and reporting will occur in accordance with the applicable authorizations and will include but not be limited to the following:

- Regular inspections of buildings, Landfill, ore stockpile, STF, borrow pits, and roads.
- Implementation of inspection follow-up actions as necessary.
- Regular inspection of available water storage capacity.

All inspections and monitoring activities will be recorded and filed with the corporate office.

Infrastructure maintenance will be undertaken and will include the following tasks:

- Culvert repair and other road repairs as required.
- Airstrip surface maintenance and repair as required.
- STF maintenance in accordance with the *Soil Treatment Facility Management Plan*.
- Equipment maintenance as required.
- Landfill maintenance in accordance with the *Landfill Management Plan*.

8.0 FINAL CLOSURE MEASURES

Final closure commences when a formal notice of abandonment is filed during the final stages of mining or exploration, or during a long-term shut down event. Once a decision for final abandonment has been made, a Final Closure Plan (FCP) will be submitted to the NWB.

Decommissioning of the site would then commence in accordance with an approved FCP during the next available construction season. It would include either on-site disposal where appropriate and/or removal of camp components and equipment either by air, or via a future winter trail or an all-season road, for off-site disposal.

Post closure monitoring will be undertaken in accordance with an approved FCP and water licence. Inspections will be carried out in accordance with the various authorizations.

Future final closure measures may reasonably include those presented below.

8.1 ROADS AND AIRSTRIP

Upon final closure, all roads would be regraded with the shoulder slopes flattened to reduce erosion and promote positive drainage. All culverts will be removed and the drainage opened to allow natural flow. In order to promote natural growth of vegetation, the roads will be scarified to provide the needed microclimate sites for seed establishment. No active seeding is planned. The roads that are raised above the natural topography will be reduced in height and contoured prior to scarifying.

Depending upon the requirements of the KIA as the landowner, the airstrip may also be regraded and the surface scarified upon final closure recognising that the airstrip will be required to access the site for post-closure monitoring.

8.2 BORROW AND QUARRIES

Esker borrow areas will be contoured to minimize erosion. Quarries, if developed, will be inspected to ensure slopes are suitable for long-term slope stability and water shedding, and any stockpiled overburden will be distributed to promote the establishment of vegetation islands.

8.3 MINE WORKINGS

Upon final abandonment of the Project, the portal will be sealed in accordance with an engineered design. The area immediately in front of the portal will be re-contoured for long-term stability and drainage.

8.4 WASTE MANAGEMENT

Waste items may be disposed of either underground, in a surface landfill, or off-site. Engineered designs for the disposal of bulky materials underground or in a surface landfill will be developed.

8.5 RISK MANAGEMENT

As part of the development of future final closure measures, Blue Star may establish a set of adaptive management terms and apply them to the waste rock that was removed from the underground workings in 1996 and 1997.

8.6 MONITORING AND MAINTENANCE

8.6.1 CLOSURE MONITORING AND MAINTENANCE PROGRAMS

Soil Contamination

The soil underlying those areas used for fuel caches during closure will be tested prior to final closure. Any impacted soil will be recovered, packaged, and shipped off-site for treatment.

8.6.2 POST-CLOSURE MONITORING, MAINTENANCE AND REPORTING

Post-closure monitoring is anticipated to involve water quality monitoring downstream of reclaimed infrastructure and geotechnical stability assessments of the closed landfill and reclaimed areas.

Water Quality

Post-closure, the camp pad and material laydown pads will continue to be exposed to the environment. Accordingly, it is reasonable to anticipate the need for post-closure water quality monitoring for some time. Research conducted during the progressive reclamation activities will better inform the duration of post-closure monitoring.

Geotechnical

Monitoring of the stability of the portal closure measures, cover(s), closed roads, airstrip, borrow, and quarries is reasonable to include in post-closure monitoring.

9.0 FINAL ENVIRONMENT CONDITIONS

9.1 RESIDUAL EFFECTS PREDICTION

Historically, previous site owners used waste rock to construct site infrastructure such as roads, pads, and berms. The potential for negative residual effects as a result of the legacy waste rock on surface better understood after ML/ARD research work at site. Current assessments of waste rock geochemistry indicate that the delay to onset of acidic conditions in the waste rock that has been covered with esker sand is likely to be decades however geochemical studies of waste rock left uncovered indicate near term onset of acidic conditions (see Appendix A). To address current and potential future residual effects at closure options are being evaluated to inform interim mitigation measures and a long-term ML/ARD rock management plan in the near term.

9.2 LANDFORMS AND VEGETATION

Revegetation of disturbed areas at the Project will focus on the enhancement of the ground surfaces by promoting natural reintroduction of native species while reducing the opportunity for erosion. Scarifying of hard-packed surfaces to open up the ground will provide the required microclimate for natural plant growth, enhancing seed entrapment, moisture retention, and wind protection. The roads, currently raised above the natural topography, will be reduced in height and contoured prior to scarifying.

The site has been constructed to provide a level pad for camp construction and materials laydown. This grading is only minimally raised above the fractured rock outcropping and boulders, leaving very little flexibility in the final topography. At this time, it is anticipated that the areas near the natural slopes will be shaped to blend in with the natural topography.

10.0 CLOSURE SCHEDULE AND EXECUTION STRATEGY

10.1 REGULATORY FRAMEWORK

Should Blue Star decide to proceed to final closure at Ulu in the future, an application will be submitted to the Nunavut Planning Commission (NPC) for a conformity review. It is reasonably anticipated that the NPC will refer the application to the NIRB for screening or review, after which Blue Star will apply to the NWB for an amendment to its water licence to approve a Final Closure Plan. Depending on the surface and subsurface agreements in place at the time, related submissions may need to be made to the KIA, the Government of Nunavut, the Government of Canada, and NTI.

10.2 FINAL CLOSURE SCHEDULE AND EXECUTION STRATEGY

Final closure will proceed once an FCP has been approved and the water licence has been amended. The closure activity schedule will be determined during planning of final closure; it will consider the site conditions existing at that time, as well as equipment and workforce availability and cost. Closure work will be undertaken using equipment previously transferred to the adjacent exploration site, as described in Section 6.6.1. Depending on the status of exploration activities and available bed space, the establishment of a temporary camp may be needed to support the closure.

11.0 RECLAMATION AND CLOSURE LIABILITY

Table 12 provides a summary of the costs for completing the tasks outlined in Section 6.0. A detailed breakdown of these costs is included in Appendix D. Blue Star estimates the current reclamation security as approximately $ 1.689 million and is therefore requesting a reduction of security to the amount of $1.709 million.

The financial security held by the Minister of Crown-Indigenous Relations and Northern Affairs (CIRNA) has remained largely the same, approximately $1,680,000, since 2000 ($1,685,542 is currently held by CIRNA). An additional $943,835 is held by the KIA. This includes $750,000 Blue Star posted as additional financial security with the KIA to address the shortfall in reclamation security held by CIRNA and the KIA during the licence assignment process. It should be noted that in the time between licence assignment to Blue Star and the submission of this plan, significant progressive reclamation has been undertaken on site.

Since the submission of the initial plan and this current revision the Landfill has been created with deposits made into it, the contaminated soils have been studied in more detail and aerated where possible reducing the amount of material requiring treatment. A recognition of residual effects from waste rock used in infrastructure creation having a shortening delay to onset of acidic conditions has also occurred in this period.

A staged approach to security administration is considered suitable; this will allow exploration to proceed, planned reclamation to be undertaken as was contemplated in the licence assignment process, and additional related progressive reclamation activities to be undertaken as needed in the future.

The Licensee acknowledges that following completion of progressive reclamation, historical mine-related infrastructure and liabilities will remain on site, such as roads and pads, airstrip, mine portal, and waste rock. Prior to advancing the project to construction and operations, an assessment of future closure requirements and of the appropriate financial security needed for implementation will be required. The

Licensee commits, through the amendments to the licence and approval of this ICRP, to submit and maintain appropriate financial security as the project moves through the exploration and mine life cycle.

Table 12. Progressive reclamation cost estimate.

Task	2020 Costs C$	2024 Costs C$
Direct Costs	***1,074,749***	***449,486***
Building Demolition	33,491	3,941
Non-Hazardous Waste Landfill	287,597	95,649
Soil Treatment Facility	517,773	301,433
Ore Management	80,411	0
Mine Workings	55,760	0
Hazardous Material Management	55,492	19,612
Borrow & Quarry	4,807	5,657
Construction Material Transport to Site	39,418	23,194
Indirect Costs	***1,479,617***	***1,239,367***
Mobilization	421,140	493,081
Waste Rock ML/ARD Investigation	43,418	150,000
Monitoring and Reporting	205,539	160,640
Management and QA/QC	145,600	100,800
Bonding/Insurance	10,747	4,495
Health and Safety	10,747	4,495
Project Management	53,737	22,474
Engineering	53,737	22,474
Contingency	***534,950***	***280,908***
Total	**2,554,367**	**1,688,854**

12.0 HOOD RIVER, ROMA & OTHER REGIONAL ACTIVITIES

12.1 HOOD RIVER CAMP 2019-2021

This temporary camp underwent final closure as outlined in the previous version of this plan. No other temporary camps have been established.

12.2 ROMA PROJECT

No temporary camp or fuel caches have been established in the Roma project area. All activities are supported from the Ulu camp.

13.0 REFERENCES

BGC Engineering Inc. and Lorax Environmental Services Ltd. 2005. Ulu Mine Waste Rock and Ore Storage Plan. Prepared for Wolfden Resources Inc., Ulu Exploration Project. March 21, 2005.

Bonito Capital Corp. 2013. Interim Closure and Reclamation Plan. Prepared by Bonito Capital Corp., a wholly owned subsidiary of Elgin Mining Inc. March 2013.

Bonito Capital Corporation. 2016. Ulu Gold Project, Nunavut, Canada, Interim Closure and Reclamation Plan. Prepared by Bonito Capital Corporation, a wholly owned subsidiary of Mandalay Resources Corporation. March 2016.

Bonito Capital Corporation. 2018. Ulu Project – Progressive Reclamation Workplan. Submitted as attachment 4 Water Licence Amendment. Submitted to the NWB March 6, 2018.

Canadian Council of Ministers of the Environment (CCME). 1999 – Updated to September 2018. Canadian Environmental Quality Guidelines. Canadian Council of Ministers of the Environment, Winnipeg.

Canadian Council of Ministers of the Environment (CCME). 2008. Canada-Wide Standards for Petroleum Hydrocarbons in Soil: Technical Supplement. January 2008. Revised from 2001 version.

Canamera Geological Ltd., Environmental Resources Division. 1996. Appendix 7, Wildlife and Wildlife Habitat Assessment. In: Environmental Assessment, Ulu Project. Prepared for Echo Bay Mines Ltd. November 1996.

Cowley P. 2014, amended up to July 10, 2015. Technical Report on the Ulu Property, Nunavut, Canada, under the HOODRIVER-001 Mineral Exploration Agreement, CO-20 IOL. Prepared for WPC Resources Inc.

Echo Bay Mines Ltd. 1997. Environmental Assessment, Ulu Gold Project. January 1997.

Environment and Climate Change Canada. 2019. The Ecological Framework of Canada, Southern Arctic Ecozone, Takijuq Lake Upland Ecoregion. Accessed March 2019.http://ecozones.ca/english/region/41.html

Environment and Climate Change Canada. 2023. 1991-2020 Climate Normals & Averages. Retrieved November 26, 2024. https://climate.weather.gc.ca/climate_normals/index_e.html

Flood E, Kleespies P, Tansey M, Muntanion H, and Carpenter R. 2004. An Overview of the Ulu Gold Deposit, High Lake Volcanic Belt, Nunavut, Canada. Exploration and Mining Geology CIM Special Volume, Vol. 13, October 2004.https://pubs.geoscienceworld.org/cim/emg/article-abstract/13/1-4/15/137982/An-Overview-of-the-ULU-Gold-Deposit-High-Lake?redirectedFrom=fulltext

Institute for Advanced Field Education Ltd., 1998. Land-Cover and Vegetation of the Ulu Site and Ulu/Lupin Winter Road, Nunavut, Canada. January 1998.

Gartner Lee Limited. 2005. Appendix IV, Preliminary Baseline Water Quality Assessment - Ulu. In: Ulu Mine Waste Rock and Storage Plan. Prepared for Lorax Environmental Services Ltd and BGC Engineering Inc. February 17, 2005.

Gartner Lee Limited. 2006. Hydrological Assessment of West Lake. Prepared for Wolfden Resources Inc. May 2006.

Hubert and Associates and Canamera Geological Ltd. 1996. Appendix 6, Notes on Wildlife in the Vicinity of the Echo Bay Mines Ulu Project and Associated Transportation Corridor. In: Environmental Assessment, Ulu Project. Prepared for Echo Bay Mines Ltd. August 1996.

KBL Environmental Ltd. 2021. 21-114NT Ulu Gold Project – Soil Characterisation Memo. Draft memo prepared for Blue Star Gold Corp. September 2021.

KBL Environmental Ltd. 2022. 21-114NT Ulu Gold Project – Soil Characterisation Updated Summary. Memo prepared for Blue Star Gold Corp. September 2022.

KEL Environmental Ltd. 2023. Limited Phase II Environmental Site Assessment – Ulu Mine. Report prepared for Blue Star Gold Corp. January 2023.

KEL Environmental Ltd. 2024. 2024 Limited Phase II Environmental Site Assessment – Ulu Gold Mine Project. Report prepared for Blue Star Gold Corp. September 2024.

Klohn-Crippen. 1996. Appendix 4, Ulu Project, Preliminary Assessment of Acid Rock Drainage Potential. In: Environmental Assessment, Ulu Project. Prepared for Echo Bay Mines Ltd. October 1996.

Klohn-Crippen. 1998. Ulu Project, Kinetic Testing of Sulphide-Rich Material from Ulu. Prepared for Echo Bay Mining Ltd. April 1998.

Mehling Environmental Management Inc. 2004. Ulu Project, Review of Field Column Kinetic Test Data, Final Report. Prepared for Wolfden Resources Inc. December 2004.

Mackenzie Valley Land and Water Board/ Aboriginal Affairs and Northern Development Canada. 2013. Guidelines for the Closure and Reclamation of Advanced Mineral Exploration and Mine Sites in the Northwest Territories. November 2013.

Nunavut Impact Review Board. 2018. Terminology and Definitions, NIRB Technical Guide Series. December 2018.

Nunavut Tunngavik Incorporated. 2008. Reclamation Policy. September 2008.

Quaternary Consultants Ltd. 1996. Appendix 8, Ulu Mine Project Archaeological Impact Assessment: Phase I. In: Environmental Assessment, Ulu Project. Prepared for Echo Bay Mines Ltd. July 1996.

Quaternary Consultants Ltd. 1996. Appendix 9, Ulu Mine Project Archaeological Impact Assessment: Phase II. In: Environmental Assessment, Ulu Project. Prepared for Echo Bay Mines Ltd. September 1996.

Rescan Environmental Services Ltd. 1991. Appendix 3, Ulu Project, Northwest Territories, Environmental Overview. In: Environmental Assessment, Ulu Project. Prepared for BHP Minerals. December 1991.

RL&L Environmental Services Ltd. 1996. Appendix 5, Fisheries Assessment of Streams and Lakes in the Ulu Project Area. In: Environmental Assessment, Ulu Project. Prepared for Echo Bay Mines Ltd. November 1996.

RL&L Environmental Services Ltd. 1998. Baseline Aquatic Studies Program in the Ulu Project Area, Nunavut. Prepared for Echo Bay Mines Ltd. May 1998.

SRK Consulting (Canada) Inc 2020. ML/ARD Summary of Waste Rocks, Ulu, Nunavut. Technical memo prepared for Blue Star Gold Corp., March 2020.

SRK Consulting (Canada) Inc 2021. Characterisation of Metal Leaching and Acid Rock Drainage Potential at the Ulu Remediation Project, Ulu, Nunavut. Report prepared for Blue Star Gold Corp., March 2021.

SRK Consulting (Canada) Inc 2022a. Further Characterisation of Metal Leaching and Acid Rock Drainage Potential at the Ulu Camp, Ulu Gold Project, Nunavut. Report prepared for Blue Star Gold Corp., March 2022.

SRK Consulting (Canada) Inc 2022b. Non-Hazardous Landfill Construction Report, Ulu Gold Project – Interim Draft Report. Report prepared for Blue Star Gold Corp., September 2022.

SRK Consulting (Canada) Inc 2024. 2023 Monitoring of Metal Leaching and Acid Rock Drainage Potential at the Ulu Camp, Ulu Gold Project, Nunavut. Report prepared for Blue Star Gold Corp., March 2024.

SRK Consulting (Canada) Inc. 2025. Geochemical Guidance for Reclamation of Waste Rock at Ulu Camp. FINAL. Prepared for Blue Star Gold Corp: Vancouver, BC. Project number: CAPR003914. Issued September 24, 2025.

Stantec 2018. 2018 Ulu Project Technical Inspection. Report prepared for Bonito Capital Inc. November 2018.

Stearman, A. 2020. Peridotite 932 Memo to Blue Star Gold Corp. November 12, 2020.

Tansey, C.M. 1997. Ulu Gold Project, Feasibility Study. Prepared for Echo Bay Mines Ltd. December 1997.

TBT Engineering Consulting Group. 2010. 2010 Annual Geotechnical Inspection, Various Earth Structures, Ulu Mine, Nunavut. Prepared for MMG Resources Inc. November 3, 2010

Appendix A: Geochemical Guidance Report

Appendix B: PHC Contaminated Soils Update

Appendix C: Draft Landfill Report

Appendix D: Progressive Reclamation Cost Estimate