

# ENVIRONMENTAL MANAGEMENT PLAN

## MEADOWBANK PRECIOUS METAL PROPERTY NUNAVUT, CANADA

Prepared for:

**Western Atlas Resources Inc./**

**5530 Nunavut Inc.**

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**Effective Date: January 1, 2021**

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## 1 Introduction

This Environmental Management Plan (“EMP”) has been developed on behalf of 5530 Nunavut Inc., a wholly owned subsidiary of Western Atlas Resources Inc. (the “Company”) in accordance with applicable legislation, guidelines and best practices. This EMP applies to the activities associated with the Meadowbank Precious Metal Property (the “Property” or “Project”), Nunavut, Canada.

The EMP will come into effect January 1, 2021, pending approval from all relevant regulatory bodies. Copies and updates to this plan may be obtained via the Company or APEX Geoscience Ltd. (“APEX”). The ARP will be replaced, upon approval, if there are any significant changes to the activities outlined in the existing permits which warrant changes to the ARP. Minor changes will be submitted as an addendum to the EMP and submitted to the distribution list as required.

### 1.1 Contact Details

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### 1.2 Purpose and Scope

The purpose of the Meadowbank Precious Metal Property Environmental Management Plan is to outline the companies’ environmental policy, and to address environmental issues related to exploration at the Meadowbank Precious Metal Property. The plan includes the following:

- A summary of regulatory requirements.
- An overview of Meadowbank Precious Metal Property environmental protection measures.
- A discussion of stakeholder issues, including procedures for dealing with anthropological or archaeological sites.
- Possible disturbances to land, flora, and fauna related to exploration.
- Wildlife management practices and appropriate use of firearms.
- Environmental requirements for diamond drilling.
- Hazardous material handling and waste management practices.
- A summary of abandonment and restoration plans.

Emergency response guidelines are beyond the scope of this plan. In the event of an environmental emergency, personnel will defer to the Meadowbank Precious Metal Property “Emergency Response Plan” and “Spill Contingency and Fuel Management Plan” for guidance.

### 1.3 Environmental Policy

5530 Nunavut Inc. is firmly committed to the protection and conservation of the natural environment, and to ensuring the health and safety of all employees, contractors, and people in surrounding communities. The environmental policy for the Meadowbank Precious Metal Property is to:

- Develop the project in a socially and environmentally responsible manner.
- Fully comply with all applicable environmental legislation and regulations.
- Work in cooperation with federal, territorial, and local governments, as well as other relevant regulatory bodies, and the general public, on all aspects of environmental protection and policy.
- Assess and mitigate any potential environmental impacts and minimize risks to the health and safety of all employees, contractors, and the general public.
- Ensure contractors operate according to the Meadowbank Precious Metal Property environmental policies and procedures.
- Employ an emergency response plan to reduce impacts of unforeseen events.
- Provide ongoing instruction on Meadowbank Precious Metal Property environmental policies and spill prevention and response plans for all employees and contractors.
- Keep employees, contractors, inspectors, government, and regulatory bodies informed of any changes at the site or with project activities.

### 1.4 Other Plans

The EMP should be considered as a part of the property wide management system. Other management plans in place at the Meadowbank Precious Metal Property include:

- Abandonment and Restoration Plan (ARP)
- Emergency Response Plan (ERP)
- Spill Contingency and Fuel Management Plan (SCFMP)
- Waste Management Plan (WMP)

### 1.5 Property and Camp Description

The Meadowbank Precious Metal Project (the “Project”) is located in the eastern part of the District of Kivalliq, within 1:50,000 scale National Topographic System (“NTS”) map sheets 56D12, 66A09, 10 and 16 and 66H01 and 08. The Project consists of three non-contiguous claim blocks (Black A, B and C) located on Crown Lands, approximately 50 km north of the community of Qamani'tuaq (Baker Lake) and 280 km northwest of the community of Kangiqliniq (Rankin Inlet).

The mineral claims are all 100% owned by 5530 Nunavut Inc, a wholly owned subsidiary of Western Atlas Resources Inc. All claim blocks comprising the Project are accessible by helicopter and the Agnico Eagle Mines Limited (“Agnico”) All Weather Access Road (“AWAR”), linking Baker Lake to Agnico’s Eagle’s Meadowbank and Amaruq mines. Permission is required from Agnico to use the AWAR.

Exploration activities on the Meadowbank Precious Metal Property to date include: helicopter-borne, versatile time domain electromagnetic (“VTEM”) surveys, ground induced polarization (“IP”) surveys, geological mapping, prospecting and rock geochemical sampling in 2018; a Property visit in 2019 and diamond drilling of 13 holes from 7 platforms in 2020. During the 2020 drilling program, on the request of Agnico, the AWAR was used by Agnico Eagle’s Energy and Infrastructure team to refuel an Orbit Garant fuel storage container located at Kilometer 58 on the Agnico AWAR in order to assist Western Atlas to reduce the amount of helicopter flights required to refuel the drill.

Although a 10-person temporary camp with fuel cache is currently permitted at the project, the 2018, 2019 and 2020 programs were based out of Baker Lake. The 2021 and other future programs will either be based out of Baker Lake once again or supported by a temporary 20-40 person exploration camp with fuel cache. Structures for the proposed camp will include 10 sleeper tents, 1 medical tent, 1 kitchen, 1 dry (with showers), 1 office tent, core shack, generator shack, incinerator and outhouses/pacto systems. The majority of the structures will be insulated Weatherhaven tents, or similar, with plywood floors.

5530 Nunavut Inc. proposes to drill 15,000 to 20,000 m annually. Annual drilling programs are anticipated to commence approximately April 1 and run for 12 weeks (84 days). All field work and drilling will be confined to the Meadowbank Precious Metal Property mineral claims as illustrated in the Project Location Figure located in Appendix 1).

## **2 Applicable Legislation and Guidelines**

Exploration at the Meadowbank Precious Metal Property will be conducted in accordance with various Acts, Regulations, Guidelines, and Recommendations including, but not limited to:

### **2.1 Federal**

- Canadian Environmental Protection Act
- Canada Wildlife Act
- Fisheries Act
- Nunavut Waters and Nunavut Surface Rights Tribunal Act
- Public Health Act
- Species at Risk Act
- Territorial Lands Act
- Nunavut Land Claims Agreement
- Department of Fisheries and Oceans Canada Operational Statements
- Guidelines for Spill Contingency Planning (INAC)
- Migratory Birds Convention Act

### **2.2 Territorial**

- Nunavut Environmental Protection Act
- Nunavut Wildlife Act

- Caribou Protection Plan / Caribou Protection Measures
- Environmental Guideline for the Burning and Incineration of Solid Waste

### **3 Environmental Protection Measurers**

Exploration activities at the Meadowbank Precious Metal Property will be assessed for environmental impact risks and every measure available will be taken to ensure the protection and preservation of the natural environment. For the duration of the program, all activities will be documented and sites photographed to comply with environmental due diligence. All on-site employees and contractors will be provided with environmental training, and will become familiar with relevant regulations. The Project Supervisor will be responsible for implementing environmental policies and training, and managing the environmental monitoring program.

Environmental training, monitoring, reclamation, and site clearance surveys will be built in to the program budget to ensure adequate resources are being allocated to environmental management. Preference will be given to contractors with high standards of environmental stewardship, and who have a proven track record of sound environmental practice.

### **4 Stakeholders**

Stakeholders may be individuals or groups concerned with, or affected by, exploration activities at the Meadowbank Precious Metal Property. Stakeholders will be identified and consulted with for the duration of the exploration program. Approvals will be sought from stakeholders and regulatory bodies pertaining to relevant environmental, social, and cultural issues. A portion of the Meadowbank Precious Metal Property lies on an area of Traditional Landuse as defined by the Nunavut Planning Commission in the Draft Nunavut Land Use Plan. Prior to any large scale exploration programs or drilling 5530 Nunavut Inc. will conduct community consultations in order to incorporate any Inuit Qaujimajatuqangit into the project planning and design and to address any outstanding issues or concerns.

In addition to consulting with community members, whenever possible, 5530 Nunavut Inc. will attempt to hire local residents to assist in many aspects of the project such as: as wildlife and environmental monitors, camp management assistants, core cutting/processing technicians and geo-technical assistants to not only utilize their skilled labor, but extensive knowledge of the land and wildlife.

#### **4.1 Archaeological or Paleontological Sites**

In June of 2017, 5530 Nunavut Inc. commissioned Golder Associates to complete an Archaeological Overview Assessment for the Meadowbank Precious Metal Project.

The Archaeological Overview Assessment provided 5530 Nunavut Inc. with information of known sites in the Project area and where there is a high potential for the discovery of undocumented sites. The report was used to assist in the Project planning for the 2018, 2019 and 2020 programs and will be used for planning all future programs.

No new or known archaeological sites were encountered during the 2018, 2019 and 2020 programs.

Actions will be taken to ensure that any known or undocumented archaeological or palaeontological sites or artifacts are not disturbed. These include, but are not limited to:

- No company staff, contractors or project visitors will operate any vehicle over a known or suspected archaeological or palaeontological site.
- No company staff, contractors or project visitors will remove, disturb, or displace any archaeological artifact or site, or any fossil or palaeontological site.
- The company will immediately contact the Nunavut Department of Culture and Heritage (“CH”) at (867) 934-2046 or (867) 975-5500 should an archaeological site or specimen, or a palaeontological site or fossil, be encountered or disturbed by any land use activity. A report will be prepared documenting the discovery and sent to CH and CIRNAC. Reports will include GPS coordinates, a brief description of the site and/or artifact and photos (if possible).
- Company staff, contractors or project visitors will immediately cease any activity that may disturb an archaeological or palaeontological site if encountered during the course of a land use operation until permitted to proceed with the authorization of CH.
- Company staff, contractors or project visitors will follow the direction of CH and CIRNAC in restoring disturbed archaeological or palaeontological sites to an acceptable condition.
- Company staff, contractors or project visitors will provide all information requested by CH concerning all archaeological sites or artifacts and all palaeontological sites and fossils encountered in the course of any land use activity.
- When conducting geochemical sampling, geological mapping, prospecting, ground geophysical surveys and drilling all relevant field personal will have maps with all known sites marked.
- Before commencing any work where ground disturbance may occur, the area will be surveyed for any archaeological or paleontological sites.
- Building of inuksuk is prohibited.
- 5530 Nunavut Inc. will ensure that all persons working under its authority are aware of these conditions concerning archaeological sites and artifacts and palaeontological sites and fossils.

***Nunavut Department of Culture and Heritage:***

***Phone:*** 867-975-5500

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***INAC Field Operations Manager:***

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## 5 Identification of Potential Impacts and Proposed Mitigation Measures

### 5.1 Designated Environmental and Socio-Economic Areas

The Meadowbank Precious Metal Property is not located within any federal or territorial Protected Areas, as defined by Environment and Climate Change Canada. The nearest National Park to the Property is the Ukkusiksalik National Park of Canada, located 200 km northwest of the Property. The Thelon Game Sanctuary is located 175 km to the west of the Property and the Queen Maud Gulf Migratory Bird Sanctuary located 150 km northwest of the Property.

As defined by the Draft Nunavut Land Use Plan a portion of the Meadowbank Precious Metal Property is located in areas which are considered Valued Socio-Economic Components. The property is located in an Area of Traditional Landuse and a portion of Areas B and C are within the Baker Lake community drinking water supply.

### 5.2 Wildlife Disturbance Mitigation

#### 5.2.1 *Wildlife and Habitat*

All interaction with wildlife is discouraged; however, employees and contractors will be trained in the appropriate actions to take when encountering wildlife in the field. Intentionally approaching, disturbing, or feeding wildlife is strictly prohibited. Any incidents will be thoroughly investigated and disciplined. All wildlife, and their dwelling sites, will be respected and efforts will be made to avoid them. All personnel will be required to record any wildlife sightings and will be instructed on the appropriate action to take when encountering wildlife in the field.

Animal sightings will be recorded in the “Wildlife Record Log” and reported to NIRB, CIRNAC and the NWB as part of the Annual Reports. If any wildlife enters any of the area of operations at the Meadowbank Precious Metal Property, protection measures will be followed and operations will be halted until the animal has moved out of the vicinity. Any bears or nuisance wildlife will be immediately reported to the project supervisor, CIRNAC and the Nunavut Department of Environment.

General exploration activities at the Property such as geochemical sampling, geological mapping, prospecting and airborne/ground geophysical surveys are generally very low impact. Geochemical sampling and geological mapping require no mechanized equipment and ground geophysical surveys do not require the use of any sizable or noisy machinery. Drilling activities may cause noise disturbances to passing animals, but care will be taken to located drillpads away from any wildlife nests or dwellings. There is also the potential for a fuel or oil spill at the camp or drill sites. Policies and procedures outlined in the Meadowbank Precious Metal Property “Spill Contingency and Fuel Management Plan” will be followed at all times to mitigate the chance of a spill.

Aircraft support is required to carry out daily operations at the Meadowbank Precious Metal Property. Helicopter support will be required for daily operations in including pick up/drop off of field personnel and drill rig and fuel moves. Possible impacts that may arise from the use of aircraft include fuel spills, and noise disturbance. When low altitude flights are necessary, such as deploying field personnel, all efforts will be taken

to avoid wildlife, dwellings, and nests. Pilots will be instructed not to land where wildlife is present unless it is an emergency situation. If a landing occurs for any reason in the presence of wildlife, it will be documented and submitted to NIRB, CIRNAC and the NWB in the Annual Reports.

Appropriate screens will be placed over all water intakes at camp and at the drill in order to reduce the potential for fish entrapment.

### **5.2.2 Caribou Mitigation and Monitoring**

The Meadowbank Precious Metal Property lies within Caribou rutting grounds and the Winter Core Range, as defined by the Government of Nunavut Shapefiles. Portions of the Property also fall within spring and fall migration areas. 5530 Nunavut Inc. recognizes special consideration is required and the following measures will be strictly followed to mitigate potential impacts on Caribou.

All 5530 Nunavut Inc. employees, contractors and visitors will be instructed and must strictly adhere to the following:

- Caribou avoidance will always be the priority mitigation measure.
- Whenever possible drilling activities will be planned to avoid caribou.
- Local community members will be employed as wildlife and environmental monitors.
- All sightings of caribou will be reported to the project supervisor, included in the report will be the number of caribou and distance from camp or work site, their approximate numbers, direction of movement and general behaviour.
- Wildlife reports, containing information on sightings and interactions of all wildlife, denning sites, raptor nests and any work suspensions will be included in the Annual Reports submitted to NIRB, CIRNAC and the NWB.
- 5530 Nunavut Inc. will establish a caribou alert system to alert personnel of the number and distance of caribou from camp, drill sites, and mapping, prospecting or sampling areas.
- The location of caribou will be monitored during all helicopter flights, the pilot and passengers will survey for any caribou and report any potential sightings to the project supervisor.
- In the event caribou cows calve in proximity to 5530 Nunavut Inc. camps or work areas, 5530 Nunavut Inc. will suspend operations (e.g. drilling, mapping, prospecting, sampling, helicopter flights, snowmobile and ATV) in all work areas within 10 km of any area occupied by cows and calves until caribou have moved out of the 10 km radius.
- 5530 Nunavut Inc. will suspend flights lower than 300 m (e.g. airborne surveys and shorter transportation flights) above ground level (when safe to do so) in the presence of caribou cows and calves.
- During the spring pre-calving migration (April 15 – June 1), fall post –calving migration (June 15 – August 1) and pre-breeding rut migration (August 1 – November 10) periods, the shores of water bodies within proximity of the Meadowbank Precious Metal Property will be surveyed. 5530 Nunavut Inc. will

suspend all operations within 10 km of any caribou crossing until the caribou have safely crossed.

- Activities will be suspended if concentrations of caribou (50 or more) approach within 2 km of drilling operations. Activities will not resume until all of the caribou have moved out of the area.
- A 1 km buffer zone will be used as a measure of a safe distance for working in areas where caribou (less than 50) are present. If caribou come within 1 km of any work site, work activities will immediately cease until the caribou have moved safely beyond the buffer zone.
- Absolutely no activities will be conducted that will interfere with caribou cows and calves. All activities that may interfere with caribou cows and calves will cease.
- 5530 Nunavut Inc. will insure that absolutely no exploration activities will cause a diversion to the migration patterns of any caribou.
- 5530 Nunavut Inc. will communicate with the Hamlet of Baler Lake, the Baker Lake hunters and trappers organizations and any other interested parties regarding caribou sightings and appraised movements in the area.

### **5.2.3 Species at Risk**

- 5530 Nunavut Inc. recognizes that with any project, there is a potential for activities to negatively affect wildlife, and of greatest concern, affect species at risk. Although all wildlife will be protected and treated with respect during all activities at the Meadowbank Precious Metal Property, special consideration will be given to the species identified below. All observations of wildlife will be recorded will be included in the Annual Reports submitted to NIRB, CIRNAC and the NWB. Any human-wildlife interaction will be reported immediately.

*Peregrine Falcon, anatum/tundrius complex, Red-necked Phalarope and Short-eared owl– Special Concern (SARA)*

- Raptor, Red-necked Phalarope and Owl nests, as well as all birds, their nests and eggs will always be avoided during exploration activities.
- Any observed nests will be recorded and included in the wildlife record submitted annually
- All staff, contractors and project visitors will be trained to never approach or disturb nests
- All staff, contractors and project visitors will be trained on how to identify Red-necked Phalarope nests via descriptions provided by Environment Canada and photos.
- Excessive hovering or circling over areas likely to have birds will be avoided
- Any nest found will be recorded, photographed and reported to the Gov-NU Ecosystems Biologist. In the case of the Red-necked Phalarope, Environment and Climate Change Canada will be notified as well.
- The Gov-NU Ecosystems Biologist will be asked to advise on the establishment of an appropriate buffer zone, determined by the species and the surrounding habitat, to protect it until the young have naturally left the nest.

### *Grizzly Bear, Wolverine and Transverse Lady Beetle – Special concern (COSEWIC)*

- All 5530 Nunavut Inc., staff, contractors and Project visitors will be properly trained in wildlife disturbance mitigation, including deterrent and interaction measures
- Proper measures will be taken in camp, at drill sites and in the field to reduce the attraction of wildlife including proper storage and handling of food and waste
- All bears, wolverines and other wildlife, as well as their dens, will be avoided at all times by field crews
- Any observations of bears, wolverines or Transverse Lady Beetle will be recorded and submitted with the annual report and any human-wildlife interaction will be reported immediately.

#### **5.2.4 Migratory Birds**

5530 Nunavut Inc. has implemented the following mitigation measures to prevent potential impacts on migratory birds. All 5530 Nunavut Inc. employees, contractors and visitors will be instructed and must strictly adhere to the following:

- All staff, consultants and Project visitors will be educated in, and comply, with all applicable legislation and regulations.
- All wildlife, including birds and their dens and nests will be respected
- Approaching any wildlife, including birds or nests will be strictly prohibited.
- Never destroy nests or eggs of any birds.
- Avoid disturbing nests and known concentrations of birds by maintaining a 1.5 km buffer when in transit by aircraft.
- Avoid approaching known nests while on foot.
- Attempt to prevent birds from nesting on man-made structures.
- Minimize flights during migration, nesting and moulting.
- Avoid areas used by flocks of migrating waterfowl by 3 km.
- Avoid excessive hovering or circling over areas likely to have birds.
- 5530 Nunavut Inc. prohibits depositing substances harmful to migratory birds into waters.
- Migratory bird observations will be included in the Wildlife Observation logs and submitted with the annual reports
- Any inadvertent disruption of migratory birds, nests or eggs will be immediately reported.
- Special care and concern, including monitoring will take place during migratory bird nesting periods in the area (mid-May – mid-August).
- Any nest found will be recorded, photographed and reported to the Gov-NU Ecosystems Biologist. The government biologist will be asked to advise on the establishment of an appropriate buffer zone, determined by the species and the surrounding habitat, to protect it until the young have naturally left the nest.

#### **5.2.5 Firearms**

Registered 12 gauge shotguns will be located in camp and at drill sites to ensure the safety of all personnel on the Property. 12 gauge shotguns are the preferred firearm to

be used for the purposes of bear deterrence as they are capable of firing non-lethal deterrents and lethal rounds. All firearms in camp will be stored unloaded and be regulated by the Project Supervisor. Firearms at drill sites will be stored unloaded in gun cases.

All persons carrying or handling a firearm must have a valid Firearms License and be approved by the Project Supervisor. Hunting is strictly prohibited for all employees and contractors, and will result in immediate termination and potential charges for any territorial hunting violations. Firearms discharge of any kind must be reported immediately to the Project Supervisor. Use of firearms against nuisance or aggressive wildlife is considered only as a last resort. Non-lethal deterrents will always be used whenever possible to deter problem wildlife with lethal rounds only being used in defense of life or property.

### **5.3 Vegetation, Soil and Permafrost Disturbance Mitigation**

Vegetation at the Meadowbank Precious Metal Property consists mainly of moss, lichens, stunted plants and Arctic grasses. The grasses are typically observed growing at lower elevations in areas associated with river drainage basins.

Vegetation and permafrost can potentially be impacted by camp and drilling activities. Mitigation measures to reduce the impact include limiting the amount of vegetation disruption to ensure proper shade coverage and reduction in the potential for ground thaw and subsidence. Footpaths can be marked using stakes and flagging tape to ensure that impacts to vegetation are confined to a small area or boardwalks can be built between camp buildings to reduce damage to vegetation on high-traffic footpaths. Areas that have patterned ground, clay-rich soil and or wetlands will be avoided. Heat radiating from camp buildings may thaw permafrost, so all heated camp structures will be slightly elevated above the ground to allow air circulation. Earth may be required to be moved in order to construct sumps in camp and at drill sites; however natural depressions and areas free of vegetation will be used whenever possible. Any topsoil moved will be collected to use in re-vegetation efforts. If a sump is excavated, it will be barricaded until it can be back-filled.

Soil quality can be impacted from spills of fuel and other materials and waste discharge. Preventative measures include appropriate and approved storage locations and containers with secondary containment. All fuel, hazardous materials and drilling will be a minimum 31 metres away from any watercourses. Refueling will be done with precision and appropriate due-diligence will be taken. Drums and hoses will be inspected regularly for leaks and pans or absorbent pads will be placed below fuel transfer areas and stationary machinery. See the Meadowbank Precious Metal Property “Spill Contingency and Fuel Management Plan” for more information.

### **5.4 Air and Noise Quality**

Impacts on air quality can result from discharge of exhaust from airplanes, helicopters, drilling operations and diesel generators, as well as emissions from incineration. Given the remote location with lack of air quality issues which currently exists within the Property location, the short duration and small scope of activities are not expected to

result in any measurable air quality impacts. The camp will utilize an Environment Canada approved batch waste, controlled air, dual chamber incinerator to incinerate waste, therefore reducing harmful emissions. Incinerator ash will be stored in sealed containers and back-hauled to Baker Lake for Proper disposal.

Noise can result from the use of planes, helicopters and drills and to a lesser degree from activities within the camp, which can disturb wildlife. Mitigation measure include, but not be limited to: helicopter avoidance of any raptor nests, bear dens and wolf dens, waterfowl and shorebird staging areas during critical seasons and near large mammals. In addition drill activities and associated work will cease if caribou cows and/or calves appear nearby.

## 5.5 Drilling Operations

Drilling contracts will be awarded to companies that exhibit high standards of environmental practice and who are willing to adhere to the environmental policies of the Meadowbank Precious Metal Property. The following conditions are imposed for drilling activities:

- Sites will be as small as possible while still allowing adequate area for fire protection.
- All stored fuel and drill additives will be stored in secondary containment.
- Biodegradable drill additives will be used whenever possible.
- Recirculation and filtration equipment will be used to minimize the amount of water used and additives released into the environment. Secondary containment for additives will be placed around the hole.
- Any residual drill water will be contained in sumps. Sumps will be positioned down slope from the drill collar in such a manner that runoff flows into the sump. Sumps will be positioned a minimum of 31 metres from the normal high water mark of any water body.
- If any artesian water flow is detected, the hole will be plugged and cemented in bedrock to prevent continued flow. Any artesian water flow will be reported to CIRNAC and the Nunavut Water Board.

## 6 Hazardous Materials

All hazardous materials will be handled and stored in accordance with the Meadowbank Precious Metal Property “Spill Contingency and Fuel Management Plan.” Fuels and other hazardous materials will be stored within “Arctic Insta-Berms”, or similar products, for secondary containment. Hazardous material storage sites will be located a minimum of 31 metres from the normal high water mark of any water body. Electric or hand wobble pumps equipped with filtration devices will be used for the transfer of diesel, jet fuel, and gasoline from their storage containers directly to their end-use fuel tanks. Portable drip trays or mini-berms will be used to mitigate the risk of any spillage, and fully stocked spill kits will be available at all refueling stations, drill sites, and at various locations throughout camp.

All hazardous materials will be clearly labeled in accordance with the Workplace Hazardous Materials Information System (“WHMIS”) and other applicable legislation.

Labels will include, but not limited to, the type of fuel, safe handling procedures, reference to Material Safety Data Sheets (“MSDS”), company name, and the date of delivery to site. Signs with the same information, along with MSDS for each fuel type will be posted at each hazardous material storage or transfer site. “No Smoking” signs will be posted at each fuel cache, drill site, and fuel transfer area.

All personnel required to handle hazardous materials will be trained in WHMIS, the Transportation of Dangerous Goods Act, and the Meadowbank Precious Metal Property “Spill Contingency and Fuel Management Plan” and “Emergency Response Plan”.

## 7 Waste Management Planning

All wastes will be handled and disposed of in accordance with the Meadowbank Precious Metal Property “Waste Management Plan” and will comply with federal and territorial legislation. Waste management operations at the Meadowbank Precious Metal Property comprise a number of activities with the common goal of reducing the amount of waste generated on site and to ensure that any wastes created are reused, recycled, or disposed of in a responsible manner. Wastes will be separated at the source into a number of categories including: materials for incineration, inert recyclables, inert non-combustible materials, and hazardous materials.

Combustible waste will be incinerated in a batch feed dual-chamber controlled air incinerator, in accordance with the *Environmental Guideline for the Burning and Incineration of Solid Waste* by the Nunavut Department of Environment and the *Canada-Wide Standards (CWS) for Dioxins and Furans* by the Canadian Council of Ministers of the Environment. All attempts will be made to reduce the moisture content of waste to be incinerated, which will decrease the amount of smoke produced and increase the completeness of combustion. All waste will be covered and stored inside sheds or other secure buildings to keep rain and snow out of the waste and reduce the attraction for wildlife. If wet waste must be burned, such as organic (food) waste, the wet waste will be mixed with dry waste to reduce the overall moisture content of the batch.

All inert materials that cannot be incinerated will be placed in appropriate sealed containers and removed from site for reuse, recycling or proper disposal at an accredited facility.

All hazardous wastes will be sealed in appropriate containers, labeled, documented and removed from site for proper disposal at a licensed disposal facility. A waste manifest will accompany hazardous waste in transit and all parties involved will be properly accredited.

Camp greywater will be stored and treated in an excavated sump, which will allow for slow infiltration into the soil and will be located at least 31 m away from a water body. If available, coarse gravel will be placed in the bottom of the sump to provide filtration, and supports will be built on the sides to prevent slumping. Filters will be installed on kitchen drains to ensure solid food wastes do not enter the sumps and have the potential to attract wildlife. Sump will be monitored to ensure they maintain an adequate

freeboard at all times. Sumps and pipe will be inspected at regular intervals for leaks or overflow. When full, greywater sumps will be covered with enough material to allow for future ground settlement.

Privy pits (outhouses) and/or facto facilities will be located at least 31 m away from any water body. To control sewage pathogens, outhouses will be periodically treated with lime. When full, the pits will be covered with at least 30 cm of compacted soil. Facto waste will be incinerated with incinerator specifically designed for that waste type. Ashes from incineration will be removed and taken to approved disposal site

## **8 Abandonment and Restoration**

Prior to land use permit, claim or lease termination, all structures, equipment, supplies, fuel, and wastes will be removed from the Property with the exception of core box stacks, which will be permanently secured on site. Materials of value will be salvaged. Local businesses and residents will have the opportunity to salvage any remaining materials that will otherwise be disposed of. Any contaminated areas around the camp or drill sites that have gone unnoticed will be treated as per the “Spill Contingency and Fuel Management Plan.” A thorough inspection of all areas of activity will be conducted, and photographs will be taken to include in the final reports submitted to the Water Resource Inspector and as part of the Annual Reports submitted to NIRB, CIRNAC and the NWB. All relevant regulatory agencies will be notified once the final clean-up has concluded.

Any wooden floors will be burned in accordance with the Nunavut Environmental Guideline for the Burning and Incineration of Solid Waste. The open burning of structures will only occur after approval from CIRNAC and the NWB. A request letter will be submitted to the regulating authorities, which will include the characteristic and volume of material to be burned.

Areas disturbed by activities related to exploration at the Meadowbank Precious Metal Property will be fertilized, if recommended by the CIRNAC Inspector, to encourage re-vegetation. Any eroded or washed out areas related to exploration activities will be filled and re-contoured to natural levels.

After site reclamation is complete, annual monitoring may occur. The monitoring may include soil and water testing, measuring and documenting plant re-growth, examining potential run off and erosion problems, and checking the stability and condition of core racks and boxes. Reports, including photographs, will be submitted to all appropriate regulatory bodies.

Further details on abandonment and restoration can be found in the Meadowbank Precious Metal Property “Abandonment and Restoration Plan”.

## Appendix 1: Figures

