EXPLORATION DRILLING

Environmental Assessment Registration

Pursuant to the Newfoundland and Labrador *Environmental Protection Act*

Submitted by Exploits Discover Corp

April 27, 2023

EXPLOITS
DISCOVERY CORP

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1 INTRODUCTION

Exploits Discovery Corp. (Exploits) has obtained Mineral License for Exploration (E220602) NL Mineral Lands Division. The planned mineral exploration project (Bullseye Early Exploration) will comprise the following:

- Prospecting;
- Geochemical sampling - rock, soil, and till;
- Ground geophysics - VLF-EM survey;
- Airborne geophysics (including UAV) – LiDAR survey; and
- Diamond drilling (1 drill rig).

Site access to complete the exploration utilize existing logging roads and trails, with only short trails to access drill pads being constructed. All cut timber will be mulched and used for rehabilitation at the drill sites.

As part of the exploration activity, Exploits is proposing to drill within 200 m of the Gander River, a scheduled salmon river. The general location of the drilling activity is shown on Figure 1- 1. This document provides technical information regarding the proposed drilling program within 200 m of the Gander River, which is referred to as the Gander River Mineral Exploration Project (Project). The Project will involve exploration drilling at five (5) collar locations with associated drill pad clearings (25 x 25 m). Primary access will be from existing trails with short access trails mulched to access the the drill pads. The northern boundary of the potential drilling area is 100 m from the Gander River, an archeological buffer where no ground-disturbing activities are permitted, per the Bullseye Property Exploration Approval (Appendix A).

1.1 The Proponent

The proponent is Exploits Discovery Corp, a Canadian listed company that specializes in the exploration and development of gold properties.

Proponent:
Exploits Discovery Corp
Suite 206
2 Toronto St
Toronto, ON
M5C 2B5
Mr. Jeff Swinoga
President, CEO, and Director
jeffswinoga@expoits.gold

Contact for the Environmental Assessment:
Mr. John Sferrazza
President
Environmental Applications Group Inc.
St. Catharines/Sudbury, ON
www.environmentalapplications.ca
Tel: 705 929 5245
Fax: 705 688 0400
e-mail: john.sferrazza@environmentalapplications.ca

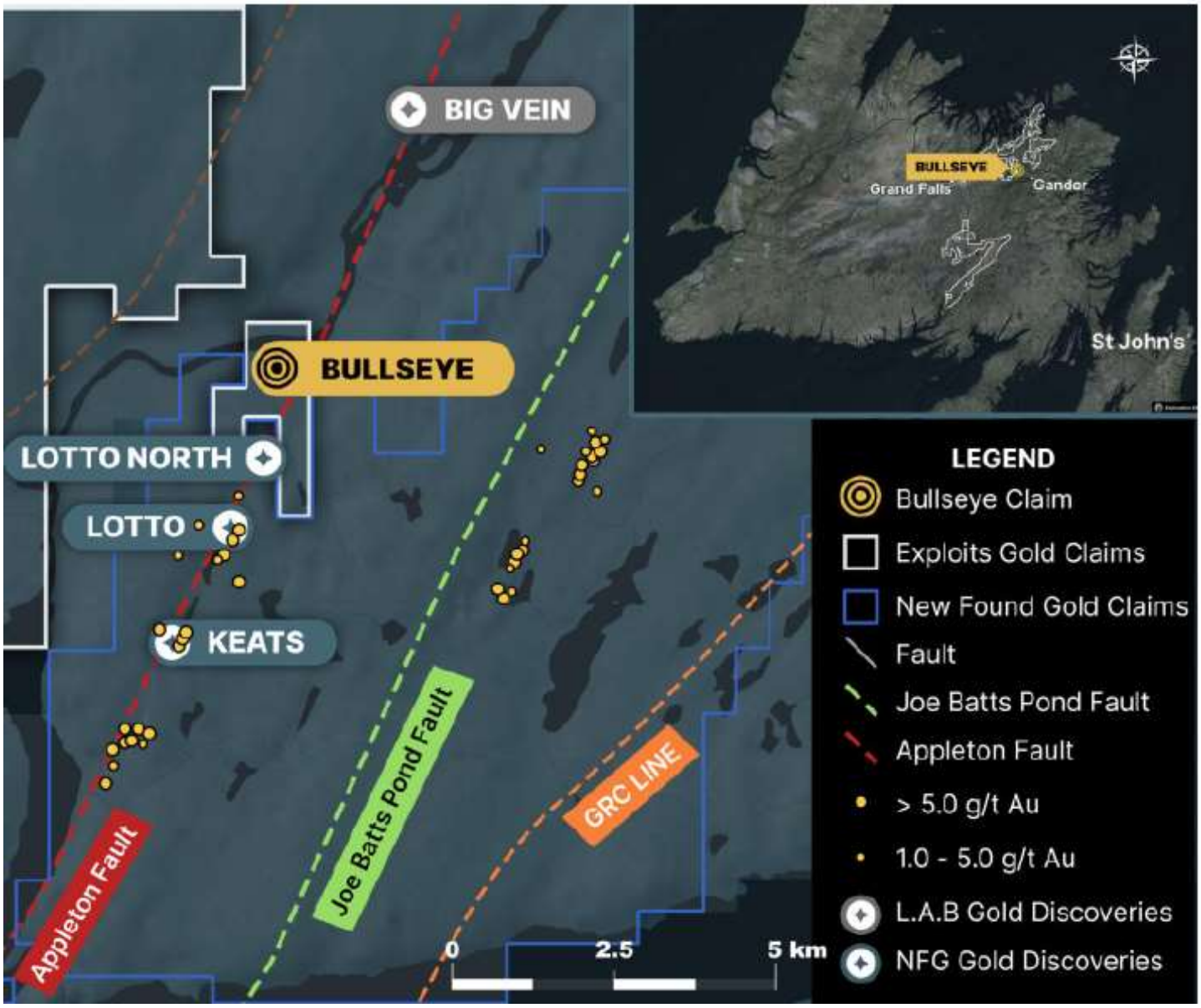


Figure 1-1 General Location of Bullseye Early Exploration Activity

1.2 Purpose, Rationale, and Need for the Undertaking

Exploits is a public mineral exploration company exploring for gold on the island of Newfoundland. The proposed diamond drilling program and the Project are part of its ongoing exploration efforts. The purpose of the Project is drilling, geological examination and sampling of core to determine the orientation and size of potential mineral bodies and testing their gold content for economic viability. By continuing exploration activities, there would be an economic benefit to the region from the undertaking and, if additional economically viable mineable deposits are discovered, there would be further economic benefits from the expansion and potential development of defined deposits.

2 DESCRIPTION OF THE UNDERTAKING

2.1 Geographic Location

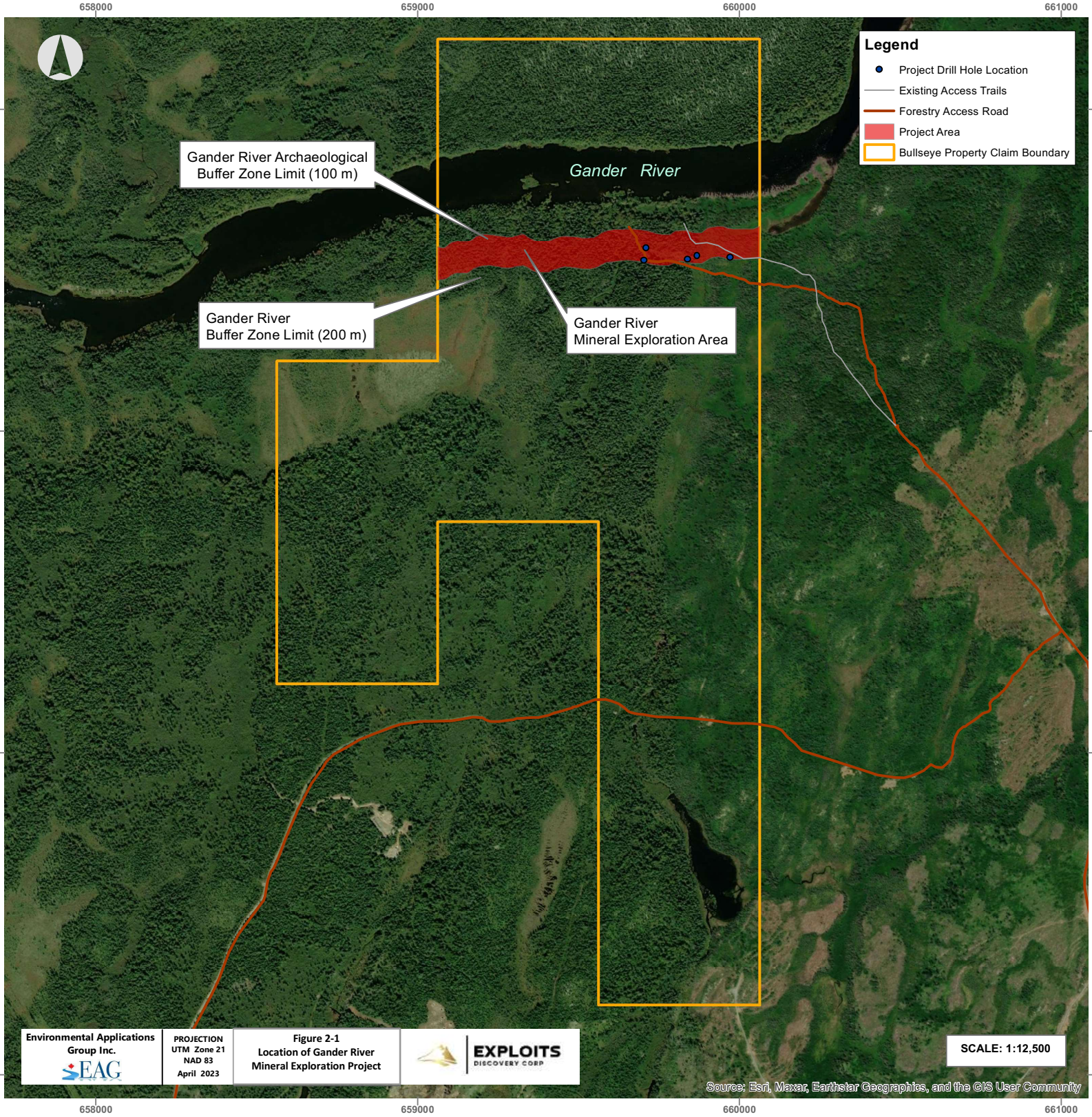
The proposed Project will involve exploration drilling within 200 m of the Gander River but outside of the 100 m archeological buffer from the river. The drilling for the Project will take place on Exploit's Bullseye property claim boundary, which is located approximately 4 km northeast of the Town of Appleton, NL. The Project property is bound in all directions by mineral licenses held by New Found Gold (east, south, and west), and Labrador Gold (north). The proposed Project drilling within 200 m is located near UTM coordinates 659302E 5431504 N (NAD 83 Zone 21) and is shown on Figure 2-1. Access to drill sites will be from existing forestry roads and trails to minimize land disturbance and water crossings. The Project location relative to existing communicates and transportation facilities is shown on Figure 2-2.

2.2 Physical Setting and Human Environment

The topography of the Project area is gently sloping towards the river with a typical relief of 5-10 m. The land cover is a mix of forest and wetlands. The Gander River is the predominant surface water body with several streams flowing north to the river. Silviculture is common in the region but there is no evidence of recent harvesting within the 200 m buffer to the Gander River. There are many trails, forestry roads, and old access roads in the area with some extending near and/or in the 200 m buffer area.

The climate of the region is maritime-humid continental, with warm summers, cool and wet spring and autumn seasons, and snowy, often windy winters. The daily average temperature in summer months is 16°C and -7°C in winter months. Maximum summer temperature is 35°C and winter minimum -31°C. The annual average precipitation is 1270 mm with higher precipitation typical in fall and winter months. Snowfall begins in late November with snow on ground into April.

The communities of Appleton and Glenwood are located approximately 4-5 km to the southwest of the project. Local land use is limited due to lack of access and there are no known designated environmentally sensitive or cultural heritage sites within the project area.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Legend
Project Drill Hole Location
Existing Access Trails
Forestry Access Road
Project Area
Bullseye Property Claim Boundary
Gander River Archaeological Buffer Zone Limit (100 m)
Gander River
Gander River Buffer Zone Limit (200 m)
Gander River Mineral Exploration Area
Environmental Applications Group Inc.
EAG
PROJECTION
UTM Zone 21
NAD 83
April 2023
Figure 2-1
Location of Gander River Mineral Exploration Project
EXPLOITS DISCOVERY CORP
SCALE: 1:12,500
Source: Esri, Maxar, Earthstar Geographics, and the GIS User Community

Environmental Applications Group Inc. EAG	PROJECTION UTM Zone 21 NAD 83 April 2023	Figure 2-2 Location of Proposed Drilling Activity Relative to Existing Communities and Transportation Facilities	EXPLOITS DISCOVERY CORP

2.3 Construction Activities

All activity associated with the proposed Project will take place outside of the 100 m archelogy buffer from the Gander River and within 200 m of the river. Activity outside of the Project area (beyond 200 m) is currently approved through exploration permits (MEA E220602). Construction activities for the project are the temporary drill pads and trails and no permanent construction is planned. No buildings or permanent infrastructure will be constructed, no aggregate will be imported, and no stream crossings are anticipated.

Construction work for the project area is expected to start in spring 2023 and continue concurrently with operation into early 2024. The Project will involve the creation of drill pads and short access trails extending from the existing forest access roads and trails. Drill pads are areas cleared of brush and trees with an approximately size of 25 x 25 m to provide safe and open areas for the operation of a diamond core drill. The exact location of the drill pads will be determined during construction in conjunction with ongoing exploration activity throughout the Bullseye property. No work will be undertaken within 30 m of stream channels or within 100 m of the Gander River (archeological buffer).

Site clearing will be conducted with an excavator mounted “mulcher” which grinds the vegetation and small trees into wood chips leaving the root mass intact so that the drill pad sites and trails are passable by heavy tracked vehicle. Chainsaws are used where required and for the felling of larger merchantable timber. Potential erosion and transport of fine-grained particles during construction will be controlled by using appropriate mitigating measures such as erosion control ditches, hay bales, silt fencing, and berms.

Sources of pollutants during the construction process include air emissions from mobile heavy equipment (e.g. excavator), drilling fluids, and the potential for petroleum spills (diesel fuel, hydraulic oil, grease, and/or gasoline). Air pollution will be controlled by having all equipment be properly maintained and equipped with the appropriate emission control devices. Noise levels associated with the work are not expected to reach nuisance levels as the nearest residential areas are several kilometres from the project.

There will be no expected solid waste material generated except for domestic waste, which will be collected, transported off site, and disposed of at an approved facility. Washroom facilities will be self contained portable toilets and be handled and maintained by a licensed service provider.

Fuel for construction equipment will not be stored in the project area and will be brought in as required using double walled Tidy Tanks in vehicles or portable fuel containers. All portable containers will be stored on secondary containment trays. The handling of petroleum products will comply with the *Storage and Handling of Gasoline and Associated Products Regulations*. Spill kits will be available on site for containment and cleanup of any hydrocarbon leaks or spills. The kits will be inspected regularly, and any used material will be replaced as soon as possible. An emergency spill response plan is part of Exploit’s Environmental Protection Plan (EPP), which is provided in Appendix B.

2.4 Operation

Operation activities will include the use of a diamond drill rig at each of the drill pad locations. Drilling at each pad typically ranges from 2 to 10 days. Drill access trails will be temporary linear trails cleared of brush and trees to a width of 5 m to allow passage of equipment. Excavating and ditching are not expected to be required and the drill access trails will typically be operated from 2-8 weeks. Reclamation activities would be progressive and commence as soon as the drill pad and trails are no longer needed.

The drills will be moved to new pad locations using a bulldozer or excavator. Water is used in the drilling process to remove drill cuttings from the drill hole. A small water pump is used to pump water from a source (freshwater and/or recycled water) to the diamond drill.

Diamond drilling produces drill cores of approximately 6 cm in diameter and samples are removed from the drill pipe and placed into wooden boxes for transport and storage. Drill cores are removed from the site and transported to the company's drill core logging location where geologists and technicians process and sample the drill cores for geological information, gold content and other analysis. Pickup trucks and track mounted mobile vehicles are employed for the transportation of drill core and personnel to and from the drill sites.

Sources of pollutants during operations include air emissions from drill rigs and from mobile heavy equipment, drilling fluids and drill effluent, and the potential for petroleum spills (diesel fuel, hydraulic oil, grease, and/or gasoline). Air pollution will be controlled by having all equipment be properly maintained and equipped with the appropriate emission control devices. Noise levels associated with the work are not expected to reach nuisance levels as the nearest residential areas are several kilometres from the project.

The liquid effluent from the drill (water with fine rock flour) will be contained and prevented from entering any water bodies using temporary containment sumps. The sumps will be lined with a geotextile fabric to contain drill cuttings and once water is filtered through the geotextile, the fabric will be removed from the sump and disposed of at a licensed waste facility.

As during construction, there will be no expected solid waste material generated during operations except for domestic waste, which will be collected, transported off site, and disposed of at an approved location. Washroom facilities will be self contained portable toilets and be handled and maintained by a licensed service provider.

Fuel for operations activities will not be stored in the project area and will be brought in as required using double walled Tidy Tanks in vehicles or portable fuel containers. All portable containers will be stored on secondary containment trays. The handling of petroleum products will comply with the *Storage and Handling of Gasoline and Associated Products Regulations*. Spill kits will be available on site for containment and cleanup of any hydrocarbon leaks or spills. The kits will be inspected regularly, and any used material will be replaced as soon as possible. An emergency spill response plan is part of Exploit's Environmental Protection Plan (EPP), which is provided in Appendix B.

Potential resource conflicts are not expected given the small area of the project and limited access but could include recreational uses such as firewood cutting, hunting, fishing, forestry, and nearby exploration activity.

Reclamation of drill pads and trails will occur concurrently during construction and operation activities and will include:

- The redistribution of vegetation or other organic materials around the site;
- Removal of all drill cutting from sumps for disposal at an approved waste disposal site:
- Re-grading of any disturbance from tracked vehicle;
- Seeding of cleared areas; and
- The use of hay to prevent erosion of unconsolidated soil.

Inspections and assessment of construction, operation, and reclamation activities will be conduced by a third-party environmental monitor (Environmental Applications Group).

Operation activities are expected to be completed by early 2024 with exact dates and work plans being contingent on results of ongoing drill activities.

2.5 Occupation

The estimated number of employees required for the construction and operation of the project, as well as the expected duration of employment are as follows:

- Full-time geologists (4) employed by Exploits for the duration of the project;
- Drilling crew (5) hired on contact by Exploits for the duration of the project; and
- Environmental monitor (1) hired on contract by Exploits to perform monthly environmental inspections during construction, operation, and reclamation activities

Exploits is an equal opportunity employer and seeks to as well as maintain diversity in its workforce including the hiring of women, men, transgender, minorities and first nations.

2.6 Project Related Documents

Exploit's Environmental Protection Plan (EPP) is provided in Appendix B.

3 APPROVAL OF THE UNDERTAKING

Environmental permits and approvals required for the undertaking, together with the names of the authorities responsible for issuing them are provided in Table 3-1. The permits are provided in Appendix A.

Table 3-1 List of Key Environmental Permits and Approvals

Approval Potentially Required	Legislation Regulation	Project Component / Activity Requiring Approval or Compliance	Department or Agency	Requirements
Government of Newfoundland and Labrador				
Exploration Approval	Mineral Act Subsection 5(4)	Diamond Drilling Drill trail construction	Government of Newfoundland and Labrador. Department of Industry, Energy and Technology (IET)	As per attached permits
Cutting Permit	Forestry Act	Tree cutting		As per attached permits
Operating Permit	Forestry Act	Forest Fire Prevention	Forestry Branch of the Department of Fisheries, Forestry and Agriculture (FFA) Newfoundland and Labrador	As per attached permits

4 SCHEDULE

Exploits began the Bullseye early exploration program in February 2023 with the clearing of trails and drill pads, and commencement of diamond drilling outside of the buffer area. Phase 1 of the diamond drilling is expected to be complete by July 2023 and follow-up work continuing to 2024 based on drilling results.

5 FUNDING

Funding for the proposed project and associated permitting requirements will be provided directly from Exploits. The estimated Project capital cost is $850,000.

Appendix A

Bullseye Property

Permits and Approvals

Government of Newfoundland and Labrador
Department of Industry, Energy and Technology
Mineral Lands Division

December 5, 2022

E220602

Nick Ryan
nryan@exploits.gold

Dear Mr. Ryan:

Exploration Approval
(54 DDH, Airborne Geophysics,
Ground Geophysics, Geochemical Survey,
Prospecting and Geochemistry)
for Exploits Discovery on the
Bullseye Property;
NTS: 2E/02, 2D/15;
Licence: 035151M

Your proposed exploration program submitted in compliance with Section 5(4) of the **Mineral Act** has been reviewed and approved.
Note that the following conditions, which are categorized based on the scope and location of exploration work, apply:

General Conditions

1. The Proponent, its employees, agents and subcontractors ("Proponent") shall comply with the Mineral Regulations, in particular sections 41 – 45. The Mineral Regulations can be read at: http://assembly.nl.ca/legislation/sr/regulations/rc961143.htm

2. This approval may be cancelled or suspended by the Minister if the Proponent fails to comply with any condition in this approval or as a result of a failure to comply with the Mineral Act, Mineral Regulations or any other provincial law or regulation. Upon cancellation or suspension of this approval the Proponent shall immediately cease all exploration activities.

3. The Proponent shall comply with any other Provincial and Federal act or regulation, and obtain all permits that may be required in connection with the exploration activity.

4. As required by Section 42 of the Mineral Regulations, the Proponent shall notify the Mineral Lands

Division of any significant changes to the approved exploration plan, and shall not proceed with exploration work, preparatory work or site access that deviates substantially from the approved exploration plan or deviates from the approved exploration plan in a manner which may significantly impact the environment without first receiving written authorization from the Mineral Lands Division.

5. The Proponent shall provide the Mineral Lands Division with:
   - A brief notice immediately before beginning the work;
   - A brief update of the status of the exploration program when it is completed.
   - Notices and updates should be sent to exploration_approval@gov.nl.ca

6. At any time the Mineral Lands Division may issue a request for information regarding completed, ongoing or planned exploration and the Proponent agrees to abide by all such requests without undue delay. The information requested may include but is not limited to: the location of exploration sites (including access trails), site preparation methods, the status of rehabilitation and cleanup, and photographic documentation of site conditions.

7. If exploration work is to take place on lands not vested in the Crown, as per section 12(2) of the **Mineral Act**, the licencee shall obtain prior written permission and forward copies to the Mineral Lands Division. Information regarding private land may be found on Crown Lands' Land Use Atlas: https://www.gov.nl.ca/landuseatlas/details/

8. Exploration work, including traditional prospecting, shall not be carried out on ground for which the mineral rights are held by another party unless permitted by an agreement registered with the Mineral Claims Recorder's office or unless written permission from the other party has been forwarded to the Mineral Lands Division. The Department's Geoscience Atlas is a current map of mineral rights held in the province. The Geoscience Atlas is located at: http://gis.geosurv.gov.nl.ca/

9. The Proponent shall ensure that all waste materials are placed in suitable refuse containers without undue delay and removed to a waste disposal site approved by Service NL to accept the type(s) of waste being disposed of. Digital Government and Service NL Government Service Centres are listed at: https://www.gov.nl.ca/dgsnl/department/contact/#locations

10. The modernized **Fisheries Act** (2019) includes fish and fish habitat protection provisions which came into effect on August 28, 2019. If you are conducting work in or near water you should refer to the Projects Near Water website (http://www.dfo-mpo.gc.ca/pnw-ppe/index-eng.html) to get information about how to comply with the **Fisheries Act** and as well as information on the project review process.

    You are responsible for:
    - understanding the impacts your project will likely have on fish and fish habitat;
    - taking measures to avoid and mitigate impacts to fish and fish habitat;
    - requesting an authorization from the Minister and abiding by the conditions of your authorization when it is not possible to avoid and mitigate project impacts on fish and fish

habitat;
- ensuring compliance with all statutory instruments, including federal, provincial, or municipal legislations/requirements.

In cases where impacts to fish and fish habitat cannot be avoided, and the project does not fall within waterbodies where a Fish and Fish Habitat Protection Program (FFHPP) review isn't required or the scope of the project is not covered under standards and codes of practice (https://www.dfo-mpo.gc.ca/pnw-ppe/practice-practique-eng.html), you are asked to submit a **Request for Review** (https://www.dfo-mpo.gc.ca/pnw-ppe/reviews-revues/request-review-demande-d-examen-004-eng.html) to the NL Region-FFHPP at FPP-NL@dfo-mpo.gc.ca. If you have any questions please call (709) 772-4140.

11. As per Section 38 (5) of the **Fisheries Act**, every person has a duty to notify DFO of an occurrence that results in serious harm to fish, or the deposit of a deleterious substance in water frequented by fish. Should such an occurrence take place, the Proponent shall contact DFO at 709-772-4140 or FPP-NL@dfo-mpo.gc.ca.

Use and Storage of Petroleum Products

12. All fuel storage containers (e.g., jerry cans, fuel drums, etc.) and water pumps shall be underlain by effective secondary containment (e.g., a drip tray) lined with absorbent pads. Absorbent pads shall be changed before becoming saturated. Secondary containment where the containment rim is broken or otherwise ineffective must be replaced or placed within additional containment (e.g., a tarp-lined wooden tray) without delay.

13. Petroleum product spills into or near a water body and petroleum product spills greater than 70 litres (or of an uncertain volume) on land must be reported without delay to Service NL by calling the Environmental Emergency 24-hour line at 772-2083 or 1-800-563-9089. In order to ensure that a quick and effective response to a spill event is possible, spill response equipment and absorbent materials should be readily available on-site.

14. The Proponent shall wash, refuel and service machinery and store fuel and other materials for the machinery in such a way as to prevent any deleterious substances from entering the water. Water depths should not submerge axle or differential vents.

Agriculture

15. The area of application partially overlaps an Agriculture Area of Interest (AOI), although there are no concerns with the proposed activities at this time.

Corner Brook Pulp & Paper Timber Licences

16. The proponent is advised to contact Corner Brook Pulp and Paper Limited (CBPPL) to discuss the proposed work taking place within CBPPPL timber licences with the goal of determining an acceptable mitigation, rehabilitation, or compensation plan that would minimize the impact on

silviculture and forest resources. Contact Faron Knott at Faron.Knott@kruger.com; 709-637-3155.

Forestry

17. The application area is located on Corner Brook Pulp & Paper Limited (CBPPL) land tenure and requires consultation with and approval from CBPPL prior to any work commencing.

18. The Proponent shall comply with the **Forestry Ac**t and regulations. The Proponent is advised to contact the nearest Forest Management District Office to obtain the following permits as required:
    - a commercial harvesting permit before the start of the exploration program if trees have to be cut for access to exploration sites. Please note that it may take up to two weeks to receive this permit;
    - an operating permit if operations are to take place on forest land during the forest fire season (May-September);
    - During the Forest Fire Season a permit to burn must be obtained to ignite a fire on or within 300 meters of forest land.

    Regional and Satellite Forestry contact information can be found at:
    http://www.flr.gov.nl.ca/department/contact_forestry.html#regional

    Forestry Management Districts and zone boundaries are shown on the Fisheries, Forestry and Agriculture (FFA) GeoHub:
    https://geohub-gnl.hub.arcgis.com/app/forestry-management-districts-and-zones-of-newfoundland-and-labrador

Water Resources

19. The proponent must apply for and obtain a permit under the **Water Resources Act**, 2002, specifically Section 48 http://assembly.nl.ca/Legislation/sr/statutes/w04-01.htm for any work in any body of water (including wetland) prior to the start of the work.

    Application forms for working within a body of water can be found online at:
    https://www.gov.nl.ca/ecc/waterres/regulations/appforms/

Crown Lands & Land Management

20. There are a number of issued Crown titles in this area. If work is to take place within these issued title sites, permission from the land owner is required.

21. There may be private land located within this area which may not be on record with the Crown Lands Office. If work is planned on these private land sites, permission is required from the land owners.

22. Access is not to be blocked.

23. Access routes are considered trails if timber is cut and no other ground disturbance is undertaken. Equipment used on trails would be tracked or high flotation tired equipment, operating directly on the root mat with sufficiently low ground pressure to prevent rutting and soil compaction. Crown Lands does not require application for trails on non-wetland sites.

24. Disturbance of root mat and exposure of mineral soil by cut and fill using an excavator or other bladed equipment for access is considered road construction. Crown Lands requires application for road construction. The visible presence of a vegetation covered linear feature on the landscape does not mean the feature was once a road, or that the feature is available for upgrading without application. Forest access roads may be in various condition, depending upon the period since last used commercially, construction methods used, and specific site conditions. Culverts, bridges and ditching may also be in various states or completely absent. Roads may be considered completely regressed and no longer considered for upgrade without an application in cases where the route is overgrown and not possible by ATV or snowmobile.

25. Forest extraction trails often appear as linear features on imagery. These extraction trails are not roads and the root mat was not intended to be disturbed on these. These are considered trails and will require application for use as a road.

26. Approximate locations of Crown Land titles can be viewed on the Public Land Inquiry map viewer here: https://www.gov.nl.ca/landuseatlas/inquiry/

27. If new road construction is required, the proponent must complete an application for Crown land and it must be approved prior to road construction. The application, and related information can be found at: https://www.gov.nl.ca/ffa/lands/applications/

28. The proposed activities are not to encroach on existing titles and the proponent should keep the safety of cottage owners and other recreational users in mind during exploration activities.

Municipal and Provincial Affairs

29. The subject location is within a jurisdiction absent land use controls. The subject property is within proximity to the Municipalities of Appleton and Glenwood and as such the Municipal Council(s) should be informed of development activity which may have impact within their municipal boundaries or planning areas. However, municipal notification is not a legislative requirement under the **Urban and Rural Planning Act**, 2000.

30. The property intersects with the Gander River System which is a Scheduled Salmon River. Any undertaking as defined by the **Environmental Assessment Regulations**, 2003 under the **Environmental Protection Act, 2002** within 200 meters of the high watermark of the river or tributaries as listed under 2(a)(i) below must be registered for Environmental Assessment.

Environmental Assessment Division

31. This application was referred to the Environmental Assessment Division and it has been

determined that registration is NOT required under Section 47 of the **Environmental Protection Act,** SNL 2002, cE-14.2.

32. Please be aware that the Environmental Assessment Division must be notified of any significant changes to the undertaking. All proponents are required to comply with all relevant legislation including permits and approvals from this Department of Environment and Climate Change and any other municipal, provincial or federal regulatory authorities.

Provincial Archaeology Office

33. The Provincial Archaeology Office has reviewed and approved this referral on the basis that **a 100m buffer is maintained on Gander River** where no ground-disturbing activities are permitted.

34. Please be advised on the provisions of the **Historic Resources Act***,* protecting archaeological sites, artifacts and significant fossils, and procedures to be followed in the event that either are found:

    a) A person who discovers an archaeological object or significant fossil in, on or forming part of the land within the province shall report the discovery forthwith to the Minister (responsible for the **Historic Resources Act**) stating the nature of the object, the location where it was discovered and the date of discovery;
    b) No person other than one to whom a permit has been issued under this Act, who discovers an archaeological object or significant fossil shall move, destroy, damage, deface, obliterate, alter, add to , mark or in any other way interfere with, remove or cause to be removed from the province that object or fossil;
    c) The property in all archaeological objects or significant fossils found in, on or taken from the land within the province, whether or not these objects or fossils are in possession of the Crown is vested in the Crown.

    Should any archaeological remains be encountered, such as stone, bone or iron tools, concentrations of bone, charcoal or burned rock, fireplaces, house pits and/or foundations, activity in the area of the find must cease immediately and contact should be made with the Provincial Archaeologist in St. John's (709-729-2462) as soon as possible.

    Copies of the **Historic Resources Act** and information on archaeology in the province may be obtained from the Provincial Archaeology Office upon request.

Wildlife

35. The Wildlife Division advises applicants to operate under established legislation and regulations, such as to prevent harassment of wildlife (Section 106 of the **Wild Life Regulations** under the **Wild Life Act**) and guidance with respect to wildlife and their habitats (e.g. nesting birds, caribou, waterfowl, wetlands, inland fish, rare plants, riparian species) to avoid or minimize adverse impacts.

    Pursuant to Section 106 of the **Wild Life Regulations:**

a. A person shall not operate an aircraft, motor vehicle, vessel, snow machine or all-terrain vehicle in a manner that will harass any wildlife;
b. You are advised that helicopter supported exploration programs must be conducted in a manner that does not disturb, harass or harm any animal life that you encounter. This can easily be accomplished by avoiding concentrations of wildlife by rescheduling the planned activities for another day.
c. Under no circumstances should nesting raptors be approached, not even for a "harmless" look. The startle effect that helicopters have on nesting raptors can be detrimental and therefore either a 600 m horizontal buffer from cliff faces or an altitude of 300 m must be observed.

No vegetation clearing is to occur within 800 metres of a bald eagle or osprey nest during the nesting season (March 15 to July 31) and 200 metres during the remainder of the year. The 200m buffer also applies to all other raptor nests (e.g. Northern Goshawk, Sharp-shinned Hawk, Merlin, American Kestrel, Great-horned Owl, Boreal Owl, Northern Saw-whet Owl). The location of any raptor nest site must be reported to the Wildlife Division.

The Wildlife Division requires a minimum 30 m naturally vegetated buffer to be maintained along all waterbodies and wetlands greater than 1 m in width or appears on a 1:50,000 scale NTS map to protect sensitive riparian and aquatic species, and their habitat.

The **Migratory Birds Convention Act, 1994**, **Migratory Bird Regulations**, **Wild Life Act** and **Wild Life Regulations** protect birds and prohibit the disturbance or destruction of bird nests and eggs in Newfoundland & Labrador. Proponents are advised to develop and implement appropriate preventative and mitigation measures to avoid incidental take of birds, nests and eggs.

Proponents must adhere to the **Motorized Snow Vehicle and All-Terrain Regulations** under the **Motorized Snow Vehicle and All-Terrain Ac**t (O.C.96-240)
http://www.assembly.nl.ca/legislation/sr/regulations/rc961163.htm

The proponent must follow appropriate hunting and trapping protocols as set in the annual Hunting and Trapping Guide. Proponents are advised to develop and implement appropriate preventative and mitigation measures to avoid incidental take of wildlife species.

This approval is due to expire on December 5, 2023.

If you have any questions concerning this approval, please contact the Mineral Lands Division at exploration_approval@gov.nl.ca

Regards,

Bernadine Lawlor
Exploration Approvals Geologist

Cc: Kevin Sheppard, Director, Mineral Lands Division
Dale O'Reilly, Mineral Incentive Geologist
Jamie Brake, Provincial Archaeology Office

FOREST SERVICE OF NEWFOUNDLAND AND LABRADOR

Place: Gambo
Date: 1/12/2023

OPERATING PERMIT

ISSUED UNDER SECTION 105 OF THE FORESTRY ACT

In accordance with the **Forest Fire Regulations**, Exploits Discovery Corp. (Nick Ryan) of

131 Row Avenue, Gander NL Phone #: 709 746-2842 Is granted permission to carry out

A logging or industrial operation during the 2023 Forest Fire Season on Crown/Private land located at

Bullseye Property Mineral Lands E220602, Cutting Permit 23-05-00504

Issued by: _____
On behalf of the
Minister of Fisheries and Land Resources

OPERATING PERMIT CONDITIONS

1. The permittee must follow all relevant sections of the Forest Fire Regulations. These regulations can be found at - https://www.assembly.nl.ca/Legislation/sr/regulations/rc960011.htm.
2. Forest fire suppression equipment as specified in the Forest Fire Regulations or any deviations as specified by a Forestry official must be located at the operating site of all operations and maintained in good working order.
3. In the event of a move to a new operating site written notification on the location of forest fire suppression equipment is to be provided to the Forestry office issuing this permit.
4. Inspection(s) will be carried out to determine if the location of forest fire suppression equipment is suitable.
5. A copy of the operating permit must be on the operating site and must be shown when requested by a Forestry official.
6. This permit may be temporarily suspended by a Forestry official if the Fire Weather Index rises to high, very high or extreme in the locality of operations.
7. This permit may be cancelled at any time by a Forestry official.
8. Where this permit is suspended or cancelled and the permittee continues operations, the permittee will be liable on summary conviction to a fine of not less than two hundred dollars for every day or part of a day that operations continue in violation on the notice of suspension or cancellation.
9. A person who fails to comply with the provisions of this permit is guilty of an offence and subject to such penalty as prescribed by *The Forestry Act*.
10. This permit is not transferable.
11. Other conditions as attached or below:

_____

_____

_____

_____

Government of Newfoundland and Labrador
Fisheries, Forestry and Agriculture
Forestry Branch

COMMERCIAL CUTTING PERMIT 2023

Permit Number :23-05-00504

Eastern	05	Gander	Miscellaneous-Gander	2023/01/12
Region	District	Zone	W.C.	Date Issued

Under and by virtue of The Forestry Act , Permission is hereby granted to:

Name:	**Nick Ryan**	Phone:	**(709) 746-2842**
Address:	**Exploits Discovery Corp** **131 Roe Avenue** **P.o. Box 159**	Driver's Licence #:	**R210802020**

To cut timber to the conditions and restrictions as stated below:

Total Volume to be harvested:	softwood	**10**m^3
	hardwood	**10**m^3

Stumpage Rates:

Fuelwood solid	$5.56 per m3
Pulpwood solid	$5.56 per m3
Sawlogs (m3)	$5.56 per m3

Location where timber is to be cut: **As Per Mineral Lands E220602**
Location where timber must be piled for scaling: **Roadside**

Standard Conditions:

- All Commercial Cutting Permit holders must have prior written approval from forestry officials, before moving harvesting operations to alternate operating areas identified within this permit.
- All harvesting equipment must be equipped with a fully–charged, 4.5 kilogram fire extinguisher at all times.
- During the cutting and removal of timber, permit holders must adhere to all requirements of the Departments ISO 14001:2015 Environmental Management System, all Standard Operating procedures and Emergency Response procedures.
- All equipment associated with harvesting operations conducted under this commercial cutting permit, shall be removed from the operating area upon permit expiry, unless otherwise agreed to by a Forestry Official.
- Cutting is NOT permitted within 100 metres of the centerline of any routed highway unless permission is provided under a special condition of this permit.
- The cutting of White Pine (Pinus strobus) or Red Pine (Pinus resinosa), regardless of tree condition (i.e. dead or alive, standing or felled) is NOT permitted unless express permission has been provided by the District Ecosystem Manager or designate.

Special Condition: Conditions as per E220602/License 035151M
Merchantable timber to be utilized and royality paid

This permit is effective starting: **2023/01/12** and expires **2023/12/31**
Fee for the issuance of this permit is: **$50.00**
Payment Method: **Visa**

L Holloway

FORESTRY OFFICIAL

Appendix B

Bullseye Property

Environmental Protection Plan (EPP)

Early Exploration Phase

Bullseye Property

Environmental Protection Plan (EPP)
Early Exploration Phase

Date: April 2023
Revision: 0

1. CONTENTS

2. INTRODUCTION

Exploits Discovery Corp. (Exploits) has obtained Mineral License for Exploration (E220602) NL Mineral Lands Division. The planned mineral exploration work will comprise the following activities:

- Prospecting;
- Geochemical sampling - rock, soil, and till;
- Ground geophysics - VLF-EM survey;
- Airborne geophysics (including UAV) – LiDAR survey; and,
- Diamond drilling (1 drill rig) - 54 drill holes, 5,000 m.

Site access to complete the exploration utilize existing logging roads and trails, with only short trails to access drill pads being constructed. All cut timber will be mulched and used for rehabilitation at the drill sites.

Exploits has developed this Environmental Protection Plan (EPP)for early exploration to help employees, consultants and contractors understand their roles and the role of the Company. Environmental protection is an overall objective for the exploration program at the Bullseye Property. In natural resource development, projects, like mineral exploration and mining, work towards environmental protection and sustainable development through the following objectives:

- The preservation of ecosystem integrity, including the capability of natural systems to maintain their structure and functions and to support biological diversity;
- Respect for the right of future generations to the sustainable use of renewable resources; and,
- The attainment of durable and equitable social and economic benefits.

The environmental protection and sustainability performance focus for site activities during exploration will include:

- Environmental protection and pollution prevention procedures;
- Improving the level of knowledge about the environmental characteristics of the site and areas potentially affected by present activities to provide a sound basis for mine design and environmental planning for future development; and
- Capacity development for site environmental monitors and their leadership in nurturing positive attitudes in all site workers for environmental awareness and stewardship.

Environmental protection planning complements other aspects of environmental management planning that include occupational health and safety; compliance monitoring; reporting; and employee orientation and liaison with governments, communities, Indigenous peoples and interested groups.

The Environmental Protection Plan contains the following sections:

Biophysical Environmental Protection Procedures

The environmental protection procedures comprise 'field useable" guidelines to avoid potential adverse environmental effects of exploration activities. Where residual adverse environmental effects are unavoidable, the implementation of the environmental protection procedures will help reduce potential adverse environmental effects to acceptable levels. The procedures presented are designed to improve sustainability performance. The range of procedures will change to meet the needs of the site activities over the life of the project.

Environmental protection procedures provide a practical way in which Exploits can demonstrate its understanding of environmental regulations, practices and procedures required to minimize or eliminate potential adverse environmental effects of activities.

Improved knowledge of biodiversity in the area will help refine environmental protection procedures including identifying sensitive areas to be avoided. Improved knowledge on biodiversity will also help identify valued components on which to focus any future environmental assessment analyses to support project approvals. Knowledge gained from a better understanding of biodiversity at the Bullseye Property and surrounding area, and sharing that information, will help establish collegial relationships with communities, stakeholders, Indigenous peoples, regulators and resource managers.

Contingency Measures

Contingency measures provide response instructions to site personnel for unplanned events.

Progressive Reclamation

Progressive reclamation of disturbed areas is an important aspect of environmental protection. Progressive reclamation helps re-establish use of renewable resources by future generations as soon as practical.

Key Contacts

Contact information relevant for the Environmental Protection Plan holders at the Bullseye Property site.

3. BIOPHYSICAL ENVIRONMENTAL PROTECTION PROCEDURES

Environmental Protection includes identifying good practices that prevent pollution and provide a high level of environmental protection procedures for routine activities associated with mineral exploration. A wide range of generic environmental protection procedures are described that can be referenced for site activities by Exploits and its contractors. The procedures largely reflect typical conditions and clauses found in various permits, authorizations, and approvals. The procedures generally reflect technically proven measures to avoid or reduce potential adverse environmental effect to acceptable levels. As the Exploits mineral exploration activities mature, there may be a need for additional environmental protection procedures to meet the needs of the project. Site environmental monitors and management will ensure environmental protection procedures are reviewed and revised as necessary over the life of the project.

When site project activities require prior planning, the environmental monitor and management must review all plans so that key environmental protection procedures can be included prior to work commencing. Such additions to planning include:

- The location of terrestrial and aquatic sensitive areas or periods to be avoided or where pre-activity survey work is required;
- The location of areas of historic or cultural interest to be avoided or where pre-activity survey work is required;
- The location of engineered facilities such as sedimentation ponds, surface water diversions where design specifications need to be verified;
- The limits of vegetation clearing; and ground disturbance; and
- The location of spill response equipment.

Exploits understands the importance of preserving biological diversity in the Bullseye Property area. A high level of knowledge about the biological resources in the area is needed, including species and populations that are rare, threatened or endangered or hold special value to Indigenous Peoples and local businesses. A good understanding of the biological diversity in the area will also help support the selection of mitigation measures to avoid or reduce potential adverse environmental effects to acceptable levels.

To achieve a good knowledge base about the existing environmental conditions in the Bullseye Property area, Exploits will:

- Characterize the physical environment and evaluate the changes in the physical environment that may adversely affect dependent biological resources;
- Design a project that reduces the total "footprint" or extent to which physical changes will occur;
- Use environmental assessment methods to determine the potential damaging effects of exploration activities on ecosystems and species and recommend ways of avoiding such effects or reducing such effects to acceptable levels;
- Conduct comprehensive biological baseline studies to characterize the existing condition, including investigation for species with special conservation status or species with special uses; and
    - Conduct monitoring programs to evaluate the effectiveness of mitigation measures intended to avoid or reduce potential adverse environmental effects.

3.1. Vegetation Clearing

Vegetation clearing (e.g., trees, shrubs) may be required for a variety of activities such as surveying, road and trail development and the clearing of work areas or drill sites. The Bullseye Property area largely comprises sections of low vegetation including 'tuckamore'. However, wildlife species use the existing habitat and some of the larger wood is used locally for home heating. Vegetation clearing shall be conducted in a respectful manner that reflects favorably on-site operations and personnel.

Measures will be implemented to minimize the potential adverse environmental effects of vegetative removal. Clearing activities will be limited to those areas that are required for exploration activities, storage areas and site access.

During vegetation clearing, the following measures will be implemented:

a) Wherever possible, existing access roads and trails will be used to access work areas.

b) Vegetation will not be cleared more than six months in advance of when the area is needed. If possible, clearing will be completed during frozen ground conditions to reduce rutting.

c) Larger vegetation and trees will be cut, using handheld equipment, to within 150 mm of the ground. All debris will be removed from the work areas.

d) Where possible, areas cleared of vegetation using heavy equipment resulting in flattened and splintered vegetation should be inspected after clearing. Damaged small vegetation (such as alders) should be removed using handheld equipment, collected, and piled adjacent to cleared area. Root masses should remain and will be driven over to preserve rootstock and prevent erosion of soil.

e) Slash will be piled for subsequent removal from site and will be disposed of such that it does not degrade aquatic habitats or pose a fire hazard.

f) Only those areas designated by prior planning will be cleared. Trees or vegetation will be blazed (preferably with biodegradable tape) at intervals in advance of clearing to demarcate the limits of the work. Blazed trees or vegetation will not be felled or cleared.

3.2. Grubbing and Removal of Material

Grubbing involves the removal of topsoil and overburden for surface exploration and site development needs. Where possible, topsoil should be separated from overburden and stored for future use in reclamation. The principal concern associated with grubbing and storage of overburden materials is erosion of exposed materials releasing sediments to watercourses. Another concern is the creation of physical blockages to surface water patterns and flow. and the ponding of water in travel and work areas. Soil loss and erosion can damage vegetation, reduce water quality and harm fish and fish habitat.

Measures to be undertaken to avoid or reduce adverse environmental effects on watercourses are as follows:

a) Topsoil and overburden stockpiles will be placed in areas such that the concern of watercourse blockages and water ponding are greatly reduced.

b) The length of time that grubbed areas will be left exposed to the natural elements will be minimized to prevent erosion.

c) Grubbing of the organic vegetation mat and/or the upper soil horizons will be minimized and left in place where possible. The organic vegetation mat and upper soil horizon material that has been grubbed will be spread to cover exposed areas. Any surplus of such material will be stored and stabilized for site rehabilitation and re-vegetation purposes elsewhere in the Bullseye Property area. Topsoil will be stockpiled separately from the overburden, and piles will be no higher than two meters. The location of the stockpiles will be recorded and accessible for future rehabilitation purposes.

d) Grubbing activities will be avoided in areas with high slopes and near watercourses. A buffer zone will be maintained between grubbed areas and watercourses. Grubbing limits adjacent to watercourses will be flagged in the field.

e) During grubbing, care will be taken to ensure that grubbed material is not pushed into areas that are to be left undisturbed. A cleared buffer (not grubbed) will be left to ensure that trees on the bush line are not under-cut by grubbing.

f) Proper erosion and sediment control measures will be used (e.g., check dams, hay bales, silt fences).

3.3. Handling, Storage and Transfer of Fuel and Other Hazardous Materials

The major concern regarding the use of fuels and other hazardous substances is their uncontrolled release to the environment through spills and subsequent adverse environmental effects on terrestrial and aquatic habitat and species, soil, groundwater quality and worker and public health and safety.

The following procedures will apply to the use of fuel and other hazardous materials:

a) All spills or accidental releases of any hazardous materials will be reported to the site environmental monitor and management (see Section 4).

b) Spill kits, fire extinguishers, and first aid kits will be available at all storage and handling areas as well as being readily available at drill site locations. Trucks used to transport fuel to drill sites and generators will have spill kits and fire extinguishers.

c) Approved rigid portable fuel tanks will be used to support drills. Rigid fuel tanks will be removed from the drill site and refilled at a central area easily accessible by mobile fuel trucks.

d) Smoking will be prohibited within 10 m of any fuel storage or handling area.

e) Waste oils and lubricants will be removed from the site by licensed contractors.

f) Contracted fuel suppliers, before transporting or positioning fuel at the site, will have a sustainability planning orientation on relevant site procedures.

g) A copy of the Exploits spill contingency procedures (Section 4) will be present at storage facilities and during transfer of fuel. In the event of a spill, the outlined procedures will be followed.

h) Any soil contaminated by small leaks of fuel, hydraulic fluid, oil, or grease will be removed and disposed of in an approved location for transport off site.

3.4. Solid Waste Disposal

Generally, the level of care by site workers around site cleanliness reflects respect for the land and natural resource stewardship. Solid waste (e.g., demolition waste, domestic waste, paper, cardboard, wood), if not properly controlled and disposed of, will be unsightly and may cause human safety and health concerns and could result in attracting nuisance wildlife.

Prior to mobilization to site, contractors must supply a list of all materials to be brought to site that are hazardous and deleterious in nature and the Material Safety Data Sheets (MSDS) for these products. The list must also detail storage plans for controlled products that will be kept on Exploits property. The list of materials and storage plan will be approved by the Environmental Monitor or designate.

Contractors shall conform to the Transportation of Dangerous Goods Act (TDGA) and Regulations (TDGR) materials for shipments. As a minimum, all regulated requirements shall be adhered to for material storage and handling at the site. Secondary containment (e.g., double walled tanks or lined containment capable of containing 110% of product) that meets applicable regulations are required for fuel and hazardous liquid storage. Contractors are required to ensure that all containers used to store hazardous materials, regardless of size or physical location, are properly labeled and that only that material specified on the label is placed in that container.

Regardless of whether a contractor generates hazardous and/or non-hazardous waste, arrangements are necessary to dispose of the waste materials. Exploits can assist the contractor in arranging the disposal of hazardous waste materials with a licensed carrier/receiver. The contractor shall pay for the disposal of their hazardous waste (i.e., antifreeze, waste oil, contaminated soils) via a licensed carrier/receiver.

Contractors must maintain good housekeeping practices while on site, by regularly disposing of waste and keeping the waste properly contained to avoid attracting wildlife and preventing accidents. To reduce waste, contractors shall use returnable containers/packaging wherever possible. Where returnable containers are not available, recyclable steel or metal containers shall be used. Where recyclable containers are not available, the most biodegradable containers available shall be used.

The following measures will be implemented:

a) Solid waste will be disposed of in appropriate containers provided at work sites so that it does not pose an environmental or health hazard or attract nuisance wildlife.

b) Waste transfer must be by licensed waste transfer companies/vehicles.

c) Recyclables will be separated and placed in appropriate recycling bins where available.

d) Any liquid wastes, such as waste oil, as well as any hydrocarbon contaminated waste, will be stored in separate containers and disposed of with a licensed receiver. Liquid wastes will be stored in a designated area outside of buildings, and no smoking signs will be posted.

e) No waste material will be deposited in a body of water.

3.5. Buffer Zones and Water Crossing

Surface exploration activities result in increased human presence, noise and other atmospheric emissions from equipment in the work vicinity. Exploration activities are situated amongst areas in the Bullseye Property used by others for a variety of recreational purposes.

Also, generally riparian habitat and shoreline habitat offers higher quality terrestrial habitat in terms of biodiversity of species and habitat for wildlife travel ways. Water bodies are all assumed to be fish bearing and contribute to the quality of life for residents. Buffer zones between work areas and sensitive areas are an effective mitigation measure.

Contractors shall maintain a vegetated buffer strip, approximately 30 m to 90 m between any activities and adjacent watercourses under the direction of the Environmental Monitor or designate.

Contractors shall install floating oil absorbent booms upstream and downstream of construction activities or as appropriate based upon conversations with the Environmental Monitor to protect against a spill. No vehicles shall be refueled or stored within 30 meters of the edge of a watercourse. Excavated spoils or unwashed aggregate material will be setback at least 30 meters from a watercourse or field drain. Depending on the surrounding slope the material may have to be stored within a containment berm (i.e., silt fences).

Under no circumstances is fording, alteration, or work within a watercourse allowed without prior approval.

The following measures will be implemented:

a) Where site activities encroach on natural watercourses a buffer zone of natural vegetation from the high-water mark of watercourses will be maintained where practical. If the available space allows for establishing wider buffer zones, then wider zones will be maintained between activities and water bodies. Fish habitat protection guidelines will be followed within natural watercourses and DFO will be consulted for guidance.

b) Silt runoff control fences, or silt socks, will be constructed at the toe of the slope outside the buffer zone to control runoff from areas of exposed soils. Silt fences/socks and buffer strips will be inspected on a regular basis. Any accumulations of silt will be removed and disposed of in an area where it will not re-enter any watercourse. Also, repairs and replacement of damaged silt fences/socks will be addressed immediately.

c) Buffer zone will also be set around any archaeological sites or areas of cultural importance.

3.6. Erosion Prevention

Erosion prevention practices are an important part of land stewardship and will be applied throughout all work areas on exposed or erodible materials. Erosion can lead to soil loss and sediment-laden runoff entering water bodies and reducing the quality of surface water and fish habitat.

The following measures will be implemented:

a) Existing vegetation will be retained where possible. Establishing trails and pathways as appropriate will minimize ground disturbances and allow the flow of natural runoff. Roads will be fitted to existing terrain and will follow ground contours as much as possible.

b) All areas of exposed erodible soils will be stabilized, as soon as practical, by scarification, back-blading or grading to meet engineered slope requirements.

c) Where erosion along exposed erodible slopes is a potential concern, silt fences and other measures such as scarification, slope breakers, silt rocks, and/or sediment traps will be constructed to control sediment runoff.

d) Biodegradable fibre mats or other types of erosion control blankets will be used to prevent erosion while vegetation is re-established.

e) Nuisance beaver activity around culverts can cause erosion of the stream crossing. Consult the Newfoundland Wildlife Division and DFO, as appropriate regarding any instances where wildlife such as beavers or beaver dams (if they are a nuisance to the work) need to be removed.

f) Construction of any erosion prevention measures will be in accordance with DFO guidance.

3.7. Exploration Drilling

The following sections pertain to contractor drilling activity on Exploits property and are in general accordance with the NL Draft Guidelines and industry best practices.

3.7.1. Drill Site Preparation

a) For drill sites prepared by removing the organic cover (e.g., by leveling, by cut-and-fill), the organic cover shall be stockpiled separately from deeper excavated materials (e.g., subsoil, till). Trees and branches cut to clear the site shall also be stockpiled, whether with the organic cover or on their own

b) For drill sites prepared by removing the organic cover (e.g., by leveling, by cut-and-fill), excavated materials shall not be stockpiled in standing trees or other locations from which they would be difficult to retrieve during rehabilitation.

c) Drill sites prepared by removing the organic cover, even if only from a portion of the site, are susceptible to erosion and could become a source of waterborne sediment that could flow into a nearby waterbody or watercourse, including by way of small streams or intermittent channels. To the extent that may be necessary to prevent waterborne sediment from a drill site from entering a waterbody or watercourse, the Operator shall employ some combination of erosion and sediment control measures:

    a) **Erosion prevention:** To the extent that may be necessary, portions of the drill site where the organic cover has been removed and any stockpiles of excavated material shall be covered with organic mulch (e.g., straw) or brush-matting. Drill sites and any associated stockpiles shall be monitored frequently enough to ensure continued effectiveness of erosion control methods, and erosion control methods augmented (e.g., organic mulch or brush-matting topped up) or extended as may be necessary.

    b) **Sediment control:** To the extent that may be necessary, sediment fences or sediment retention ponds shall be installed proactively downslope of the drill site and any stockpiles. To clarify, expanses of densely vegetated flat ground provide an effective natural means of sediment control, and where present, it may not be necessary to use other sediment control methods. With respect to sediment fences, in order to be effective, they must be installed parallel to contour across level ground rather than across existing channels or channels formed by the runoff. Sediment retention ponds are commonly used for sediment control at drill sites and are sometimes referred to as "sump pits". Sediment control methods must be monitored frequently enough to ensure continued effectiveness and replaced, augmented, or extended if necessary.

d) Sediment retention ponds (or "sump pits") excavated to contain water runoff from drilling and shall be prepared according to Requirements 5.1, 5.2, 5.3, and 5.4 of the NL Draft Guidelines, and considered as "trenches" for the purpose of interpreting these Requirements.

e) Drill sites should be prepared with the minimum ground disturbance necessary to ensure practical and safe working conditions. Ideally, drill sites should be prepared by clearing the trees and then cribbing the drill rig on timbers or lumber (no ground disturbance necessary). Helicopter-accessed drill sites are generally prepared in this way. Ground-accessed drill sites

should be prepared in the same way insofar as working conditions remain practical and safe.

f) Drill sites should not be cleared of trees to widths any greater than necessary for practical and safe working conditions.

3.7.2. Active Drilling in Winter Conditions

i. Waterborne drill cuttings (drill reject water) and drilling additives shall not be permitted to discharge onto snowpack or ice and potentially enter a waterbody or watercourse, including into a small stream or intermittent channel, irrespective of whether it is displayed on the 1:50,000 scale NTS map. The most certain way to meet this requirement is to ensure that drilling discharge waters are not permitted to flow overland into a waterbody or watercourse. Measures such as the following shall be employed as necessary to ensure compliance with this requirement:

a) If possible, sediment retention ponds (or "sump pits") should be constructed for settling drill cuttings and allowing the discharge waters to dissipate into the ground. (Refer to Requirement 7.2 in the NL Draft Guidelines)

b) Sediment dewatering bags to filter drill return water sediment, sludges, and drill fluids. Drill return water is discharged while suspended solids are contained within the dewatering bag, which can be placed inside excavated sediment retention ponds (sump pits) to further contain discharge water.

Advantages of the sediment dewatering bags include:

- Waste volume reduction
- Availability in a variety of sizes and volumes
- Removal of potential contaminants from discharge water
- Can be buried within sump pits following completion of drilling
- Mitigation of potential health and safety ("slip") hazards during winter drilling operations

c) Above ground settling tanks lined with filter cloth to collect drill cuttings. These can easily be constructed using hay bales and geotextile fabric. The fabric and drill cuttings can then be disposed of in a shallow pit after use.

d) Sediment fences to intercept drill discharge waters. With respect to sediment fences, in order to be effective, they must be installed parallel to contour across level ground rather than across existing channels or channels formed by the runoff.

e) Methods used to prevent drilling discharge waters and their contents from entering a waterbody must be monitored frequently enough to ensure continued effectiveness and replaced, augmented, or extended if necessary. Drill site inspections should be carried out prior to the commencement of each new drillhole, as well as at the commencement of each shift, and periodically throughout winter drilling. Downslope water courses will be monitored for signs of turbidity.

ii. Drilling additives shall be fully biodegradable and used only in the amounts necessary as

prescribed by the manufacturer. This requirement does not apply to brine used for drilling salt and potash.

iii. Equipment maintenance, fueling and washing (other than emergency repairs) will not be carried out within 30 m of a waterbody. The only exception to this requirement is that drill rigs and water pumps may be refueled within 30 m of a waterbody, however no more than the amount of fuel required to supply the drill and water pump for the drilling of the current hole shall be stored within 30 m of the waterbody.

iv. Water pumps shall be located on stable ground and shall be placed closer to the waterbody than necessary given the length of the intake hose. The only exception to this distance requirement is at locations where the only stable site for a water pump is at the bottom of a slope.

v. All water pumps contained within or under rain-proof housing shall be underlain by effective secondary containment (e.g., a drip tray) lined with absorbent pads. Absorbent pads shall be changed before becoming saturated. Secondary containment where the containment rim is broken or otherwise ineffective must be replaced or placed within additional containment (e.g., a tarp-lined wooden tray) without delay.

vi. All reasonable means shall be employed to prevent spills of petroleum, including spills of hydraulic oil beneath drill rigs.

vii. Petroleum spills shall be completely cleaned up without delay. Spills related to active drilling are typically cleaned up in the following ways:

a) For spills on land, including spills of hydraulic oil beneath a drill rig and spills of fuel alongside a water pump, excavate all contaminated materials (e.g., soil, vegetation) and place them into empty drums or similar containers. Be sure to excavate deep enough to retrieve all of the contaminated soil.

b) For spills on water, keep adding absorbent pads and remove them as they become saturated with petroleum. Place the contaminated absorbent pads in empty drums or similar containers.

viii. All spills will be reported to Exploits management immediately. Spills in excess of 70 litres from a storage tank system, pipeline, tank vessel or vehicle onto or into the soil or water (per Newfoundland and Labrador Regulation 58/03) shall be reported to the Mineral Lands Division.

ix. Spills having entered a waterbody or watercourse or with the potential to enter a waterbody or watercourse and spills greater than 70 litres or of an unknown or unrecoverable volume on land must be reported without delay by calling the **24-hour Emergency Spill Report line: (709) 772-2083 or 1-800-563-9089.**

x. Immediately after demobilization from a drill site, the site shall be inspected for spills of hydraulic oil or fuel, deposits of drill grease, garbage, and waste equipment, and these shall be cleaned up in their entirety without delay. Be sure to excavate deep enough to retrieve all of the contaminated soil. Soil contaminated by hydraulic oil or fuel shall be excavated and disposed of at an approved waste disposal site. Contact the nearest Government

Service Centre to find out the location of the nearest approved waste disposal site accepting the materials you have cleaned up.

3.7.3. Drill Site Rehabilitation

i. Unless the site has been re-approved under another exploration approval for additional drilling, all sites cleared of topsoil (e.g., drill pads prepared by cut-and-fill, grubbed sections of access trail, laydown areas, camp sites) will be rehabilitated before the end of the current exploration program.

ii. Drill sites prepared by removing the organic cover (e.g., by leveling, by cut-and-fill) shall be rehabilitated as follows:

   a) The site shall be re-contoured so as to approximately restore the original site topography. In meeting this requirement, it is acceptable to leave a depression around the casing if required to keep the casing exposed for possible future work.

   b) The original organic cover (topsoil, ground vegetation) and any trees and branches not used for other purposes shall be spread back over the re-contoured site. If these materials prove insufficient to completely re-cover the site, then organic mulch or seeding must be used in addition to complete the process, provided that no invasive species are introduced. Organic mulches and seeding are described in detail in the Appendix. Seeding that is unsuccessful in the opinion of the Department shall not be considered sufficient to meet this requirement.

iii. Sediment retention ponds (or "sump pits") associated with drill sites shall be backfilled seasonally, with the organic cover to be replaced no later than when the associated drill site(s) is rehabilitated.

iv. For drill sites located in open areas accessible to ATVs and snowmobiles, including within an access route, the casing shall either be removed or cut off at ground level. Drill holes that are required to be sealed shall be sealed before the casing is cut off.

v. Immediately after demobilization from a drill site, the site shall be inspected for spills of hydraulic oil or fuel, deposits of drill grease, garbage, and waste equipment and these shall be cleaned up in their entirety without delay. Soil contaminated by hydraulic oil or fuel shall be excavated and disposed of at an approved waste disposal site. Contact the nearest Government Service Centre to find out the location of the nearest approved waste disposal site accepting the materials you have cleaned up. Refer to Requirements 13.5 and 13.6 of the NL Draft Guidelines which describe special cases involving petroleum-contaminated materials which may modify this Requirement.

vi. Casings that are not pulled or removed shall be capped as soon as possible upon completion of the drill hole, and before the end of the exploration season. Capping means any effective and durable means of completely covering the casing opening, excluding the use of natural materials for this purpose (e.g., placing a rock over the casing, stuffing with large branch or piece of wood). Sawn off casings may be capped using steel caps with bolts. Drill holes for which the casing is pulled shall be covered over at the surface with material containing a large proportion of gravel coarser than the hole diameter (to limit subsidence of surface materials into the hole).

vii. Drill holes which produce artesian water at the surface (i.e., water flowing out of the top of the casing) while the drill rig is present on site shall be plugged before the drill rig departs from the site. The drill hole shall be plugged with high-swelling bentonite, cement, or another material with suitable properties. Capping is not a substitute for plugging since many caps cannot fully stop the water and the caps will eventually break due to freeze-thaw cycles. If downhole geophysics is being considered for the exploration project, the Operator and Approval Holder are advised to take this contingency into consideration and may wish to be ready to carry out downhole geophysics before plugging the hole and the drill rig departing the site in the event that a hole producing artesian water is encountered.

3.8. Dust Control

The environmental concerns associated with dust include human health effects and a reduced quality of life as well as potential adverse environmental effects on aquatic ecosystems and vegetation.

The following measures will be implemented:

a) Dust from work areas and roads will be monitored and controlled by using water, as appropriate. Waste oil will not be used for dust control, but other agents such as calcium chloride may be used.

b) Drill skirting or drill shacks will be used around drill hole collars to prevent dust coming up the outside of the casing from being blown into the surrounding environment.

c) Enclosures may also be used to contain dust (e.g., temporary structures, sprung buildings etc.).

3.9. Pumps and Generators

A variety of water pumps, hoses and generators are in frequent use in many areas of exploration programs. Environmental concerns are associated with any accidental spills or chronic leaks contaminating water bodies.

The following measures will be implemented:

a) Follow procedures associated with the storage, handling and transfer of fuels and other hazardous materials.

b) Oils, grease, gasoline, diesel, or other fuels will be stored at least 100 m from any surface water.

c) Drip pans will be placed underneath pumps and generators.

d) Hoses and connections on equipment located near water bodies will be inspected routinely for leaks and drips.

e) All leaks will be reported immediately to the site environmental monitors and management.

4. PERMIT AND APPROVAL CONDITIONS

All Exploits staff and contractors will adhere to the conditions of permits and approvals attached in Appendix C.

The following conditions related to environmental protection currently apply:

Exploration Approval:

a) The Proponent shall notify the Mineral Lands Division of any significant changes to the approved exploration plan, and shall not proceed with exploration work, preparatory work or site access that deviates substantially from the approved exploration plan or deviates from the approved exploration plan in a manner which may significantly impact the environment without first receiving written authorization from the Mineral Lands Division.

b) The Proponent shall ensure that all waste materials are placed in suitable refuse containers without undue delay and removed to a waste disposal site approved by the Department of Digital Government and Service NL (DGSNL) to accept the type(s) of waste being disposed of. DGSNL Centres are listed at: http://www.servicenl.gov.nl.ca/department/contact.html#locations.

c) The Proponent is advised of Section 45(2) of the Mineral Regulations which requires that all sites cleared of topsoil (e.g., drill pads prepared by cut-and-fill, grubbed sections of access trail, laydown areas, camp sites) be rehabilitated before the end of the current exploration program. Rehabilitation as per Section 45(2) requires that the site be re-contoured and the original organic cover (topsoil, ground vegetation, and any trees not used for other purposes) be spread back over the re-contoured site. If the original organic cover proves insufficient to completely re-cover the site then an organic substitute material must be used in addition to complete the process, provided that no invasive species are introduced. Acceptable substitute materials are straw, hay, trees having been cut in other parts of the exploration project area, or ground vegetation produced by hydroseeding. If the Proponent wishes to keep drill casing above ground then the re-contouring may accommodate this. Sumps pits and borrow pits fall under Section 45(1)(a) of the Mineral Regulations and need to be rehabilitated before the end of the exploration season in which they are excavated.

d) The Proponent shall not permit drilling discharge waters to flow overland into a water body, including into a small stream or intermittent channel, irrespective of whether the water body is displayed on the 1:50,000 scale NTS map. More specifically, waterborne drill cuttings and drill additives shall not be permitted to enter a water body.

e) All water pumps shall be underlain by a drip tray lined with absorbent pads and the pads shall be changed before becoming saturated. Drip trays where the containment rim is broken must be replaced or placed in secondary containment (e.g., a tarp-lined wooden tray) without delay.

f) Drill casings producing water in any quantity shall be sealed (grouted) before the expiry of the exploration approval and capped in the meantime. The drill holes shall be sealed with high-swelling bentonite or cement; however coarse sand may be used to fill the lower

portions of the hole. Capping is not a substitute for sealing, since many caps cannot fully stop the water and, in any case, the caps will inevitably break due to freezing and thawing.

g) Immediately after demobilization from a drill site, the site shall be inspected for spills of hydraulic oil or fuel, deposits of drill grease, garbage, and waste equipment and these shall be cleaned up in their entirety without delay. The Proponent shall excavate deep enough to retrieve all of the contaminated soil. Soil contaminated by hydraulic oil or fuel shall be excavated and disposed of at an approved waste disposal site. The Proponent shall contact the nearest Government Service Centre to find out the location of the nearest approved waste disposal site accepting the materials that have been cleaned up. Government Service Centres are listed at:
http://www.servicenl.gov.nl.ca/department/contact.html#locations

h) The Proponent shall screen any water intakes or outlet pipes to prevent entrainment or impingement of fish. Entrainment occurs when a fish is drawn into a water intake and cannot escape. Impingement occurs when an entrapped fish is held in contact with the intake screen and is unable to free itself.

i) In freshwater, the Proponent shall follow these measures for design and installation of intake end of pipe fish screens to protect fish where water is extracted from fish-bearing waters:

- Screens should be located in areas and depths of water with low concentrations of fish throughout the year.
- Screens should be located away from natural or artificial structures that may attract fish that are migrating, spawning, or in rearing habitat.
- The screen face should be oriented in the same direction as the flow.
- Ensure openings in the guides and seals are less than the opening criteria to make "fish tight".
- Screens should be located a minimum of 300 mm (12 in.) above the bottom of the watercourse to prevent entrainment of sediment and aquatic organisms associated with the bottom area.
- Structural support should be provided to the screen panels to prevent sagging and collapse of the screen.
- Large cylindrical and box-type screens should have a manifold installed in them to ensure even water velocity distribution across the screen surface. The ends of the structure should be made out of solid materials and the end of the manifold capped.
- Ensure regular maintenance of screens is carried out to prevent impingement of fish.
- Pumps should be shut down when fish screens are removed for inspection and cleaning. If this is not possible, a secondary intake should be available.

j) The Proponent is advised that exploration sites (including drill sites, trenches, test pits, and sections of access trail) associated with ground disturbance and located close to open water bodies or watercourses fall under Section 45(1)(b) of the Mineral Regulations as a site that could cause sedimentation into a nearby water body. The Proponent is required to actively ensure that any sedimentation generated from the site does not enter the water body or watercourse. Some combination of erosion prevention and sedimentation control shall be used to meet this requirement.

k) Fuel storage is approved on the basis that less than 5 drums of fuel are to be stored on site. Should more than 5 drums of fuel be required to be stored, the Proponent shall obtain a Fuel Cache Approval prior to the start of the exploration program. Fuel Cache Approvals may be obtained from the local Environmental Protection Officer, Service NL. The Proponent shall abide by the Storage and Handling of Gasoline and Associated Products Regulations, 2003 which can be found here: http://www.assembly.nl.ca/legislation/sr/regulations/rc030058.htm

l) Petroleum product spills into or near a water body and petroleum product spills greater than 70 litres (or of an uncertain volume) on land must be reported without delay to Service NL by calling the Environmental Emergency 24-hour line at 772-2083 or 1-800-563-9089. In order to ensure that a quick and effective response to a spill event is possible, spill response equipment and absorbent materials should be readily available on-site.

m) The Proponent shall wash, refuel and service machinery and store fuel and other materials for the machinery in such a way as to prevent any deleterious substances from entering the water. Water depths should not submerge axle or differential vents.

n) If the exploration activity includes stream crossings and/or fording, the Proponent shall contact the Water Resources Management Division to obtain a Permit to Alter a Water Body.

o) The Proponent shall comply with the Forestry Act and regulations. The Proponent is advised to contact the nearest office of the Forestry Branch of the Department of Fisheries, Forestry and Agriculture (FFA) to obtain the following permits as required:
   - a cutting permit before the start of the exploration program if trees have to be cut for access to exploration sites. Please note that it may take up to two weeks to receive this permit,
   - an operating permit if operations are to take place on forest land during the forest fire season (May-September).

p) The Fisheries Act requires that projects avoid causing serious harm to fish unless authorized by the Minister of Fisheries and Oceans Canada. This applies to work being conducted in or near water bodies that support fish that are part of or that support a commercial, recreational or Aboriginal fishery. If this exploration work is to take place in or near a waterbody, please complete the Department of Fisheries and Oceans (DFO) Self-Assessment at: http://www.dfo-mpo.gtgc.ca/pnw-ppe/index-eng.html

q) As per Section 38 (5) of the Fisheries Act, every person has a duty to notify DFO of an occurrence that results in serious harm to fish, or the deposit of a deleterious substance in water frequented by fish. Should such an occurrence take place, the Proponent shall contact DFO at 709-772- 4140 or FPP-NL@dfo-mpo.gc.ca.

r) Please be advised on the provisions of the Historic Resources Act, protecting archaeological sites, artifacts and significant fossils, and procedures to be followed in the event that either are found:

   - A person who discovers an archaeological object or significant fossil in, on or forming part of the land within the province shall report the discovery forthwith to the Minister

(responsible for the Historic Resources Act) stating the nature of the object, the location where it was discovered and the date of discovery;

- No person other than one to whom a permit has been issued under this Act, who discovers an archaeological object or significant fossil shall move, destroy, damage, deface, obliterate, alter, add to, mark or in any other way interfere with, remove or cause to be removed from the province that object or fossil;
- The property in all archaeological objects or significant fossils found in, on or taken from the land within the province, whether or not these objects or fossils are in possession of the Crown is vested in the Crown;

- Should any archaeological remains be encountered, such as stone, bone or iron tools, concentrations of bone, charcoal or burned rock, fireplaces, house pits and/or foundations, activity in the area of the find must cease immediately and contact should be made with the Provincial Archaeologist in St. John's (709-729-2462) as soon as possible.

s) Copies of the Historic Resources Act and information on archaeology in the province may be obtained from the Provincial Archaeology Office upon request.

t) The Wildlife Division advises applicants to operate under established regulations and guidelines with respect to wildlife and its habitat to minimize additional impacts (in particular Sections 106 a) of the Wildlife Regulations under the Wild Life Act (O.C. 96-809): www.env.gov.nl.ca/env/wildlife/index.html). Pursuant to Section 106 of the Wildlife Regulations:
   - A person shall not operate an aircraft, motor vehicle, vessel, snow machine or all-terrain vehicle in a manner that will harass any wildlife.
   - You are advised that helicopter supported exploration programs must be conducted in a manner that does not disturb, harass or harm any animal life that you encounter. This can easily be accomplished by avoiding concentrations of wildlife by rescheduling the planned activities for another day.
   - Under no circumstances should nesting raptors be approached, not even for a "harmless" look. The startle effect that helicopters have on nesting raptors can be detrimental and therefore either a 600 m horizontal buffer from cliff faces or an altitude of 300 m must be observed.

u) No vegetation clearing is to occur within 800 meters of a bald eagle or osprey nest during the nesting season (March 15 to July 31) and 200 meters during the remainder of the year. The 200m buffer also applies to all other raptor nests (e.g., Northern Goshawk, Sharp-shinned Hawk, Merlin, American Kestrel, Great-horned Owl, Boreal Owl, Northern Saw-whet Owl). The location of any raptor nest site must be reported to the Wildlife Division.

v) The Wildlife Division requires a minimum 30 m naturally vegetated buffer to be maintained along all waterbodies and wetlands to protect sensitive riparian and aquatic species, and their habitat.

w) The proponent must follow appropriate hunting and trapping protocols as set in the annual Hunting and Trapping Guide. Proponents are advised to develop and implement appropriate preventative and mitigation measures to avoid incidental take of wildlife species.

x) The Migratory Birds Convention Act, 1994, Migratory Bird Regulations, Wildlife Act and Wildlife Regulations protect birds and prohibit the disturbance or destruction of bird nests and eggs in Newfoundland & Labrador. Proponents are advised to develop and implement appropriate preventative and mitigation measures to avoid incidental take of birds, nests and eggs.

y) Proponents must adhere to the Motorized Snow Vehicle and All-Terrain Regulations under the Motorized Snow Vehicle and All-Terrain Act (O.C.96-240).
http://www.assembly.nl.ca/legislation/sr/regulations/rc961163.html

Permits to Alter a Body of Water

A Section 48 Permit to Alter a Body of Water is required for any work in or within fifteen (15) metres of a body of water (including wetlands) prior to the start of the work.

A Section 48 permit is required for the following:

1. Any work (Including fording) in any body of water (including wetlands) prior to the start of construction.

2. Any work within a floodplain or designated flood risk area prior to the start of construction.

3. Any work in Shore Water Zones prior to the start of construction. Shore Water Zone means the land that is intermittently occupied by water as a result of the naturally fluctuating surface water level in a body of water which can be either a fresh or salt water body and, in either case, the low water mark and high water mark of the water body defining the edges of the shore water zone.

4. Any work within fifteen (15) metres of the high water (Flood zone area) mark of a body of water prior to the start of work.

5. Any work associated with Wharf/Boathouse/Slipway/Breakwater or other works in any body of water prior to the start of construction.

6. Any storm drainage works involving discharge into a body of water prior to the start of construction.

7. Any work (Including fording) within wetlands and any infilling within fifteen (15) metres from wetlands.

Temporary Bridge Permit:

During Construction

a) The use of creosote treated wood is strictly prohibited within 15 meters of all bodies of fresh water in the province.

b) Drainage ditches must collect and transport surface runoff in a manner that does not cause flooding, erosion or sedimentation of adjacent land or receiving waters.

c) Bridge abutments must be set back 0.5 meters from the normal edge of a watercourse to prevent constriction during high flow conditions.

d) Infilling must not cause increased water elevation upstream or increase flow velocity downstream of the site. Reduction of the natural cross sectional area of any watercourse is not permitted.

e) The upstream and downstream sides of abutments must be protected with riprap, concrete or heavy timber to prevent erosion and scouring.

f) Where pumping is used to bypass flow, cofferdams must be installed both above and below areas of construction. The Permit Holder must provide pumps with sufficient capacity to prevent washout of cofferdams.

g) Cofferdams must be properly designed and constructed of suitable materials to prevent leakage and to resist loss of any material as a result of erosion. Cofferdams must be removed upon completion of their intended function. All material must be removed carefully to prevent disturbance of the water body and to prevent water quality degradation.

h) Abutments and piers must be constructed in the dry and during times of low flow.

i) Roadside embankments near the watercourse must be adequately protected from erosion by sodding, seeding or placing riprap.

j) Adequate erosion protection must be provided where roadside ditches discharge into watercourses near bridges.

General Alterations

a) Any work that must be performed below the high water mark must be carried out during a period of low water levels.

b) Any flowing or standing water must be diverted around work sites so that work is carried out in the dry.

c) Water pumped from excavations or work areas, or any runoff or effluent directed out of work sites, must have silt and turbidity removed by settling ponds, filtration, or other suitable treatment before discharging to a body of water. Effluent discharged into receiving waters must comply with the Environmental Control Water and Sewage Regulations, 2003.

d) All operations must be carried out in a manner that prevents damage to land, vegetation, and watercourses, and which prevents pollution of bodies of water.

e) The use of heavy equipment in streams or bodies of water is not permitted. The operation of heavy equipment must be confined to dry stable areas.

f) All vehicles and equipment must be clean and in good repair, free of mud and oil, or other harmful substances that could impair water quality.

g) During the construction of concrete components, formwork must be properly constructed to prevent any fresh concrete from entering a body of water. Dumping of concrete or washing of tools and equipment in any body of water is prohibited.

h) Wood preservatives such as penta, CCA or other such chemicals must not be applied to timber near a body of water. All treated wood or timber must be thoroughly dry before being brought to any work site and installed.

i) Any areas adversely affected by this project must be restored to a state that resembles local natural conditions. Further remedial measures to mitigate environmental impacts on water resources can and will be specified, if considered necessary in the opinion of this Department.

j) The bed, banks and floodplains of watercourses, or other vulnerable areas affected by this project, must be adequately protected from erosion by seeding, sodding or placing of riprap.

k) All waste materials resulting from this project must be disposed of at a site approved by the Department of Service NL.

l) Periodic maintenance such as painting, resurfacing, clearing of debris, or minor repairs, must be carried out without causing any physical disruption of any watercourse. Care must be taken to prevent spillage of pollutants into the water.

m) The owners of structures are responsible for any environmental damage resulting from dislodgement caused by wind, wave, ice action, or structural failure.

n) Sediment and erosion control measures must be installed before starting work. All control measures must be inspected regularly, and any necessary repairs made if damage is discovered.

Special Conditions

a) The temporary bridge must be removed upon completion of its intended function. The crossing and all associated works and material should be removed from the vicinity of the channel. Site restoration involving revegetation and stabilization of all disturbed areas should be carried out to return the channel to its previous condition.

Fording Permit:

a) Except for single passenger all-terrain vehicles, crossings by other vehicles or construction equipment shall be limited to one trip in and one trip out.

b) Timbers or rocks shall be placed in streams to facilitate crossing or to minimize damage to the channel sections provided the streams are not unnecessarily constricted or backed up.

c) Alteration of the natural minimum streamflow is not permitted in order to preserve aquatic life.

d) Stream banks at fording sites that contain loose or erodible material must be adequately stabilized before crossing to minimize any siltation of streams.

e) The natural course of any stream must not be altered.

f) Infilling must not cause increased water elevation upstream or increase flow velocity downstream of the site. Reduction of the natural cross sectional area of any watercourse is not permitted.

g) The fording sites must be located at shallow sections of the channels where there are low approach grades, and where the channels consists of stable non-erodible rock or cobbles.

h) Fording shall only be carried out during periods of low water levels.

i) When the fording sites are no longer required, the Permit Holder must dismantle and remove all constructed works and restore the sites to their original condition. All material placed in streams must be completely removed.

j) A complete oil spill clean-up kit must be on site at all times when gasoline or fuel powered equipment is being used or refueled. The kit must contain the following:
   - One hand operated fuel pump
   - One recovery container such an empty 205 litre drum
   - One shovel
   - One pickaxe
   - Five meters of containment boom
   - Five absorbent pads
   - Twenty-five litres of loose absorbent material

k) Within 30 days after expiry of this Permit, the Permit Holder must submit to the department a report confirming that each fording location was left in as good or better condition than prior to Permit Holder's fording activities. This report should include detailed pictures of each site before and after project activities.

Culvert Installation:

a) Drainage ditches must collect and transport surface runoff in a manner that does not cause flooding, erosion or sedimentation of adjacent land or receiving waters.

b) Inlet and outlet areas of culvert installations must be adequately protected from erosion by placing riprap, fitted stone, or concrete headwalls.

c) Culvert installations must follow the stream channel gradient to the maximum extent possible and placed in line with the direction of the main flow to minimize disturbance to the channel. Culverts must not disrupt the flow of water or cause ponding at the upstream side of the installation.

d) In multiple culvert installations, one culvert must be set a minimum of 150 mm lower than the others to provide adequate water depth and velocity for fish passage during low flow conditions. In addition, multiple culverts must be installed within 0.6 to 0.9 meters apart for maximum stability.

e) Where pumping is used to bypass flow, cofferdams must be installed both above and below areas of construction. The Permit Holder must provide pumps with sufficient capacity to prevent washout of cofferdams.

f) Cofferdams must be properly designed and constructed of suitable materials to prevent leakage and to resist loss of any material as a result of erosion. Cofferdams must be removed upon completion of their intended function. All material must be removed carefully to prevent disturbance of the water body and to prevent water quality degradation.

g) All work involving minor alteration to the stream channel to permit culvert placement must be carried out at a time of low flow, and in a manner that prevents downstream siltation and unnecessary alteration of the channel.

h) Grading and finishing of roadways or road embankments must not cause damage to culverts or allow road material to enter the watercourse.

i) Roadside embankments near the watercourse must be adequately protected from erosion by sodding, seeding or placement of riprap.

j) Culverts must be inspected regularly so that immediate action can be taken to clear blockages caused by ice or debris or to undertake repairs as required.

k) The inlet and outlet of culverts must be clearly marked so that operators of road grading and snow clearing equipment can avoid blocking culverts.

l) Any damage to culverts during installation or due to inadequate capacity and/or improper construction must be reported to this Department. Damaged culverts must be replaced immediately to prevent overtopping, erosion, or flooding.

m) If a culvert is installed in natural fish habitat it must be embedded a minimum of 150 mm below the natural streambed (up to a maximum of 1/3 of the culvert diameter).

Scheduled Salmon Rivers

Exploration activities must not extend within 200 meters of a scheduled salmon river without prior registration for and release under the Environmental Protection Act, Environmental Assessment Division, Department of Environment and Climate Change.

Work within 200 meters of a scheduled salmon river will require registration with the Environmental Assessment (EA) Division (EAProjectComments@gov.nl.ca).

To comply with the fish and fish habitat protection provisions of the Fisheries Act, Fisheries and Oceans Canada provides guidance measures that are to be incorporated that avoid:

- Causing the death of fish
- Harmful alteration, disruption or destruction of fish habitat in your work, undertaking or activity

These measures are described below.

a) Measures to prevent the cause of death of fish include:
- Avoiding killing fish by means other than fishing
- Avoiding the use of explosives in or near water
- Planning work near water, or undertaking activities to respect timing windows to protect fish, including:
    - their eggs
    - juveniles
    - spawning adults
    - the organisms upon which the fish feed and migrate

c) Measures to maintain riparian vegetation, include:
- Maintaining an undisturbed vegetated buffer zone between areas of on-land activity and the high water mark of any water body
- Using existing trails, roads or cut- lines wherever possible
- Avoiding tree removal
- Using methods to prevent soil compaction, such as swamp mats or pads

d) Measures to prevent destruction, disruption, or harmful alteration of fish habitat include:
- Avoid conducting any work, undertaking or activity in water
- Avoid placing fill or other temporary or permanent structures below the high water mark
- Avoid fording of the watercourse
- Avoid disturbing or removing materials from the banks, shoreline or waterbody bed, such as:
    - sand
    - rocks
    - aquatic vegetation
    - natural wood debris
- Avoid building structures in areas that:
    - may result in erosion and/or scouring of the stream bed or banks
    - are inherently unstable, like:
        - bends
        - meanders
        - floodplains
        - alluvial fans
        - braided streams

e) Maintain fish passage by avoiding:
- Changes in flow or water level
- Obstructing or interfering with the movement and migration of fish

f) Ensure proper sediment control

g) Prevent entry of deleterious substances in water

If the protection measures listed above that are applicable to the exploration work being undertaken cannot be completely implemented, a request for review may need to be submitted to Fisheries and Oceans Canada (DFO).

The DFO Fish and Habitat Protection Program regional office is listed below.

Fish and Fish Habitat Protection Program
Fisheries and Oceans Canada
P.O. Box 5667
St. John's NL A1C 5X1
Telephone: 709-772-4140
Fax: 709-772-5562
Email: dfo.fppnl-ppptnel.mpo@dfo-mpo.gc.ca

5. CONTINGENCY MEASURES

Contingency measures to address unplanned situations have been developed for Exploits' activities in the Bullseye Property Area. Notwithstanding, Exploits will make implementing preventative measures a priority as its first line of defense against the potential adverse environmental effects associated with accidents, malfunctions and unplanned events. Sustainability planning includes the continuous improvement of all practices and procedures including those addressing contingency conditions. It also includes adequate training for workers and resources being made available for effective response.

Contingency measures have been developed to address:

- Spill Prevention and response
- Wildlife encounters
- Discovery of historic resources
- Forest fires

Contingency measures will be reviewed and revised as appropriate over the life of the project to address changing conditions. Such changes include:

- New development areas for surface drilling activities
- Changes in the type and volumes of hazardous materials being transported to and from the site.
- Lessons learned from Exploits site experience to date.
- Lessons learned from industry practice and changing regulations.

5.1. Spill Prevention

Active explorations sites involve the handling, storage, and transfer of fuels and other hazardous materials to operate a wide range of vehicles, drills and various pumps and generators. Heavy equipment also requires hydraulic lines and hose couplings that can leak hydraulic fluids.

Fuel and hazardous materials can be damaging to vegetation, soil, surface water, historic resources and human health and safety. Proper procedures will be used for the handling, storage and transfer of fuels and other hazardous materials will be used by Exploits throughout the Bullseye Property Area. All equipment will be routinely inspected and maintained in proper working order including hydraulic hoses and couplings.

Spill prevention is always the most effective means of ensuring the safety of employees and the public, as well as for protecting the environment. The costs of preventing a spill are always considerably less than the costs of cleaning up a spill. As part of day-to-day activities, all site personnel and contractors should be conscious of and anticipate potential spill or other hazardous situations. Once a spill is recognized, the necessary preventative action should be taken immediately. Act promptly, if in doubt then err on the side of caution.

Standard procedures for site personnel include regular inspections of all facilities, laydown areas, and drill set-ups where fuels are used and stored. Inspections are to take particular note of the integrity of all storage containers, as well as the adequacy of spill containment systems and prevention procedures. The deterioration of storage containers or spill containment systems should be documented, and necessary corrective action recommended.

To facilitate containment and cleanup of a scale spill, hydrocarbon sorbent material (i.e., floor dry, sorbent pads and booms) should be available at workplaces where fuel is used and replenished as required. A supply of sorbent material (pads and socks to contain a spill) must be maintained at all times when working near water. Spill clean-up equipment will be inspected monthly, or as required to ensure the required supplies are available.

5.1.1. Fuel Storage & Handling

Small amounts of fuel (i.e., less than 50 Liters) are to be stored in proper CSA-approved containers or "jerry cans." Larger amounts of fuel (i.e., greater than 500 Liters) being used by contractors are to be stored in portable "tidy-tanks" which are either double-walled or are enclosed in a secondary containment on skid plates. Containers are to be grounded before fuel is transferred into them to reduce fire hazards and "jerry cans" are never to be filled up while in a vehicle. Fuel for the generators are stored in above-ground CSA approved stationary tanks.

Other materials are to be handled in accordance with their Material Safety Data Sheet ("MSDS").

Employees and staff are reminded not to use trigger-locks on hose nozzles and leave fuel dispensing equipment unattended. If used, a fuel dispensing nozzle is to be attended to at all times. Nozzles should be stored to prevent leakage when not in use.

Waste fuel and/or oil is to be stored in the liquid waste storage area.

5.1.2. Spill Response Equipment

Equipment will be maintained at contractor laydown areas, drill setups, water pump locations, fuel storage areas, and the generator building to respond to spill emergencies. Fuel storage tanks equipped with secondary containment will have secondary containment areas empty and available for use at all times. Below is a list of additional spill response equipment that is to be available:

- Pumps, hoses and drums for clean-up of any free product immediately after a spill. Portable pumps, hoses and drums should be available from the contractor. If rental units are required, Bestway Rentals can be reached at 800.890.7559 or United Rentals at 807.548.1234 or NAPA at 807.735.2300. Other rental companies are listed in the yellow pages of the phone book. Should a vacuum truck be required to recover spilled material, the numbers of several local contractors are listed below:
    - Pardys Waste Management in Pasedena 709.686.2012
    - D&S Vac Truck Services in Port aux Basque 709.437.1128
    - Crosbie Industrial in Corner Brook 709.722.8212
- Sorbent materials for clean-up. Floor dry, sorbent pads and booms are available from GDH Environmental in Stephenville (709.643.9090). Industrial Supply stores are listed in the yellow pages of the phone book.
- Heavy equipment to assist damaged vehicle or place/excavate a containment berm. Skidders and possible excavators should be available from on-site contractors. Should mini-excavators or Bobcats be required, they can be rented from Bestway Rentals at 800.890.7559 or United Rentals at 807.548.1234 or NAPA at 807.735.2300. Should larger equipment and operators be required, the phone numbers for some contractors are listed below:
    - Majors Drilling and Construction (Desmond Major – 1-709-636-2258)

5.2. Spill Response

The objective of this section is to provide a straightforward set of step-by-step instructions for site personnel to follow in the event of an environmental emergency situation including:

- initial response procedures;
- notification and reporting requirements; and
- emergency services contacts.

The specific steps are summarized in Appendix A for diesel and gasoline.

All personnel and contractors are responsible for safe and responsible material (i.e., fuel) handling and operating procedures. It is the responsibility of the site supervisor and contractor supervisors to ensure that:

- their personnel are familiar with this document; and

- regular inspections of their material (i.e., fuel) storage and handling facilities are performed.

It is the responsibility of every Exploits employee or contractor working on site to:

- be familiar with this document;
- observe and report any potential spill or leak;
- respond promptly to any spill; and
- notify the site supervisor in the event of a spill.

In the event of a spill, the first person on the scene is responsible for first response and for notification of the spill response coordinator. Responsibility for subsequent action rests with the spill response coordinator and they are the "person in charge" of the spill response.

However, it is also the responsibility of any employee or contractor discovering a potential spill to take appropriate action to control the spill, to the extent that it is safe to do so. The spill response coordinator will determine if the spill needs to be reported to the government. If reporting to the government is necessary, it should be done as soon as possible and must be done within 24 hours. Spills into a waterbody or with the potential to enter a waterbody and spills greater than 70 litres or of an unknown or unrecoverable volume on land must be reported without delay to Service NL by calling the 24-hour Emergency Spill Report line: (709) 772-2083 or 1-800-563-9089.

5.2.1. Overview of Spill Response Procedure

In the event of a fuel or hazardous material spill, the following procedures will apply. The specific steps are summarized in Appendix A for diesel and gasoline.

a) The individual who discovers the leak or spill will make a reasonable attempt to immediately stop the leakage and contain the flow (if safe to do so). For example, turn off pump, close valves, plug holes. If available, use emergency shutdown switches, (i.e., emergency valves on trucks). Approach spills with care - ensure adequate ventilation and approach from upwind. Investigate the source and cause of the release. Determine the nature of the spilled material - check container labels, observe the spill. Get appropriate Personal Protective Equipment (PPE) if required. Refer to MSDS for information on health and safety hazards, PPE requirements, clean-up procedures etc.

b) Contain the spill. If possible and safe to do so, control the source of the spill. Block off drains, culverts and ditches. Contain the spill with sorbents, dikes, cut-off trenches, separator berms etc. Take measures (i.e., dig interception trenches) to ensure spill does not migrate to a surface watercourse or enter a sewer or drainage ditch. If fuel has entered a watercourse, place an absorbent, floating boom around the affected area or at a downstream collection area. Place sorbent pads upstream of the boom to soak up fuel on the water surface. If practical, cover the outdoor spill with plastic tarps to prevent spreading by rain. If the liquid spilled is heavier than water, place straw bales or other obstructions in the watercourse to "dam" the flow of the heavy liquid.

c) Eliminate fire / explosion hazards. Eliminate all sources of ignition e.g., extinguish cigarettes, turn off vehicles etc. Be aware of fire extinguisher locations. Extinguish any fires if it is safe to

do so. If the spilled material is a flammable gas that is heavier than air (i.e., propane), eliminate any ignition sources downslope of the spill area.,

d) Control hazard situation. Assure safety of self and others, and issue warning to others on site. Rope off, or otherwise secure the area. Evacuate employees from the area if necessary.

e) Get help and notify the Spill Response Coordinator or Exploits staff. Mobilize heavy equipment as needed and obtain appropriate spill response equipment (i.e., sorbent booms, drums, pump and hose).

f) Recover visible product / contaminated material. If appropriate, pump the spill back into the appropriate containment area/vessel. Ensure all pumps, etc. are properly grounded prior to transfer of product. Soak up residual fuel with sorbents.

g) Begin sampling of downstream watercourses where appropriate. Sample bottles are available from the Environmental Monitor.

5.2.2. Spill Reporting

Immediately upon finding a spill:

a) Notify the Spill Response Coordinator, or alternate.

b) Regardless of the size of the spill, it must be reported to the Spill Response Coordinator or alternate. The Spill Response Coordinator must report it to a member of the Project team and the Environmental Monitor (refer to above contact list).

c) "Small spill" government reporting exemption. A spill of less than 70 Litres of vehicular operating fluid does not have to be reported to government if the spill is not likely to enter a watercourse, groundwater well, cause an adverse effect, and is cleaned-up immediately. Also, water discharges from broken municipal water mains (potable water) where there is no personal injury or damage to buildings do not have to be reported to the government.

d) Unless exempt from government reporting requirements, the Spill Response Coordinator or designate will report the spill to Service NL (SNL) 24 Hour Spill Reporting Line at 1-800-563-9089 or 1-709-772-2083 and also to Heather Rafuse (DNR-Newfoundland) at 709.729.6408. A Spill Report Form is provided in Appendix B.

e) Relay reporting information by telephone and then by fax as soon as possible.

f) The information requirements described below must be recorded. In addition to being necessary for reporting the spill, the environmental coordinator will need this to conduct a follow-up investigation.

The information that would be given to the Service NL 24 Hour Environmental Spill Reporting Line, and Exploits corporate contacts includes, but would not be limited to:

1. Time and date of spill. Weather conditions and conditions which may affect response efforts.
2. Name, title and number of contact person.

3. General location of spill or leak and area of deposition
4. Specific location or source of the spill or leak:
   - Nearest watercourse or body of water
   - Potential to reach surface watercourse and potential for impact on neighbouring properties. If so, what is being done to minimize the risk or impact.
5. Product spilled (product constituents and concentrations):
   - Diesel fuel (identify grade)
   - Gasoline
   - Other material. Is MSDS available? Specific health or safety hazards.
6. Severity of Spill or leak and whether it has been contained or not:
   - Minor - Less than 100 litres
   - Major - Less than 1,000 litres
   - Emergency - Greater than 1,000 litres
7. Cause of spill:
   - Total loss / leakage
   - Overturned vehicle or tanker (plus name of transport company)
   - Ruptured tank or hose
   - Lost drums
   - Weather-related, equipment / power failure
   - Broken pipeline, broken pump, flood event and overtopped dam
8. Fire hazard
9. Hazard to humans (identify), as well as plant and animal life.
10. Injuries and exposure (number, severity)
11. Expected environmental effects, if any
12. Equipment and clean-up consumables on hand. Describe clean-up and corrective action taken.
13. Has a sample been taken, or concentration been measured?

The Service NL 24 Hour Spill Reporting Line will notify all other concerned agencies, including the following, when necessary:

- Municipalities
- Ministry of Health / District Health Unit
- Ministry of Labour (submission of an Unusual Occurrence Report may be required)
- Environment Canada / Department of Fisheries and Oceans
- Other relevant agencies

The information reported will ensure that Service NL can prepare an initial spill report.

Once immediate actions are taken to contain the spill and appropriate personnel are notified, the Spill Response Coordinator will complete the Spill Report Form. A copy of this report form can be found in Appendix B. This information will be provided to the environmental coordinator to keep on file in the folder title "SPILLS." A subfolder is started for each spill and is titled according to date of the spill.

In summary, the person finding a spill reports to the Spill Response Coordinator or alternate, after initial response measures. The Spill Response Coordinator is then responsible for notifying the Environmental Monitor and the government and Exploits Corporate unless the spill is exempt from the government reporting requirement. The spill response coordinator will assume overall responsibility and delegate actions and/or responsibilities to site personnel / contractors as appropriate.

5.2.3. Spill Follow-up

After any spill or other emergency there will be a follow-up by Exploits which may include:

- Keep a report of the spill on file at site for at least two (2) years;
- Submit an Unusual Occurrence Report to the Service NL within 24 hours of the occurrence, if necessary;
- Dispose of the recovered pollutant. It may be necessary to perform a TCLP (leachate) analysis to determine if the waste is hazardous or non-hazardous. It may also be necessary to obtain an emergency Generator Number from Service NL for the disposal of waste from the site. Dispose of waste in accordance with guidance from the Environmental Monitor
- Collect samples of water and/or soils, if appropriate, to ensure no residual contamination is present per the criteria under Environmental Protection Act;
- Evaluate the cause of the spill and recommend operational changes that should be implemented to prevent a recurrence;
- Reclaim the affected area; and
- Evaluate the Spill Response Plan and any recommended changes.

5.2.4. Spill Clean-up and Disposal

The appropriate means of cleaning up and disposing of spilled material will depend on the material. The MSDS will provide the necessary information. In general:

- Petroleum products should be pumped into suitable storage drums/vessels or into a secondary containment area. Empty drums are available from contractors, scrap metal dealers, Philip Services. For spills near a fuel storage area, recoverable product may be pumped to within the secondary containment area for interim storage.
- Dispose of contaminated product / material. Contaminated fuel, snow, floor dry, sorbent booms and pads are to be stored in drums for disposal with a licensed carrier and receiver, under a Generator Registration Number obtained from Service NL.

The Environmental Monitor will maintain a folder title "SPILLS." A subfolder is started for each spill and is titled according to date of the spill. Each subfolder will contain all information related to the spill in question.

5.2.5. General Conduct in the Case of a Spill

All personnel should be aware of the possibility of charges being laid in connection with any spill or release of hazardous material. Charges may relate to the cause of the spill, to the clean-up or

the reporting of the spill. Charges can be laid against any employee, contractor, Exploits, and/or the officers and Directors of Exploits.

Thus, it is important for all relevant employees to be aware of this emergency plan, and to keep in mind the following:

- Establish a log sheet and file for all information relating to the incident.
- Keep accurate written records of all events, including telephone conversations.
- Establish a photographic record.
- If appropriate, establish a sampling program and collect as many samples as possible - the decision can be made later as to what samples to analyze.
- Confirm that Exploits personnel have contacted corporate legal counsel promptly for advice and direction.
- Begin sampling the areas of potential impact as soon as practical.

Contact with others:

- Politely but firmly ascertain the credentials, authority and tasks of personnel who arrive on site.
- Co-operate fully with the inspectors who are lawfully performing their jobs.
- Explain the facts clearly and objectively. Do not speculate on cause, effect, etc. If news media become involved, provide only facts and avoid speculation.
- If you do not know the answer to questions asked by inspectors, say so.
- Do not volunteer to give the inspectors any documents.
- Put all relevant documents in a sealed envelope labelled: "Privileged and Confidential" to remain unopened until the question of privilege is resolved.
- If documents are provided to inspectors, copies should be retained and identified as such.
- All interviews with inspectors should be conducted in the presence of at least two (2) Exploits employees.
- Do not give or sign a legal statement without conferring with legal counsel. If in doubt, contact Exploits' legal counsel.

5.3. Wildlife Encounters

Wildlife encounters pose a risk for stress or injury to both site personnel and wildlife. There is the possibility of black bears and other wildlife such as beaver, caribou, moose, coyote, and red fox to occur in the area of exploration activities. Nuisance wildlife can block watercourses and cause localized flooding (beaver) or be a pest either through curiosity or attraction to food and waste (e.g., caribou, moose, red fox, black bear).

The site environmental monitors will ensure proper waste management practices are followed and report to management for non-compliance and level of care issues with site workers and contractors. Environmental monitors will also ensure waste materials that could attract wildlife and thus become a potential nuisance will be collected for disposal in a timely manner and that working areas will be kept clean of garbage.

All Exploits site personnel will abide by the following rules in any cases of wildlife encounters:

a) No attempt to chase, catch, divert, follow or otherwise harass wildlife by ATV, aircraft, or on foot will be made by any person at the project site.
b) Equipment and vehicles will yield the right-of-way to wildlife.
c) All personnel should be aware of the potential for encounters with black bears and instructed to immediately report all sightings to their supervisor, who in turn will notify the site environment monitors.
d) When nuisance animals representing a safety concern (e.g., black bear) are identified in the project area, the site environment lead will be responsible for determining all subsequent actions.
e) The site environment monitor will notify and consult with management and Newfoundland Wildlife Division (NWD) staff for appropriate actions should nuisance animals pose a potential threat to worker safety (e.g., black bears) or to the conditions of work sites (e.g., flooded areas as a result of beaver activity).
f) Exploits and NWD staff will consult with local communities about any planned actions with respect to trapping and removal of nuisance wildlife.

5.4. Discovery of Historical Resources

This contingency plan focuses on the procedures to be implemented in the case of a suspected archaeological, heritage or cultural resources discovery.

Heritage and archaeological resources such as structures, tools, butchered animal bones, graves, pottery, or other features may be disturbed or discovered during site clearing and construction activity. These features could represent a valuable cultural resource, and uncontrolled disturbance could result in loss or damage to these resources and the information represented by them.

Local and regional experts and provincial records on known sites of heritage of historic importance will be consulted and compiled into a local area base map. Environmental monitors will use the base map to evaluate potential issues and concerns associated with site activities, new work areas and drill moves. All workers will be trained to report any unusual findings and to leave such findings undisturbed pending investigation by a qualified person.

In the event of the discovery of a historic or prehistoric artifact or archaeological site, the procedures outlined below will be implemented:

a) Work in the immediate area will be suspended, and the environment monitored with management notified immediately.
b) Management will contact the Newfoundland government as well as local Indigenous Peoples and communities, as appropriate to help determine site origins and significance.
c) The site area will be flagged for protection and avoidance, with an appropriate buffer zone determined in consultation with the Newfoundland government.
d) An Incident Report Form will be completed by the environmental monitor and forwarded to management.
e) In the event that the Newfoundland government determines the find is an archaeological deposit, Exploits will take direction regarding further contact and required actions and communicate with the site employees, as appropriate.

f) The site manager will take all reasonable precautions to prevent employees or other persons from removing or damaging any such articles or sites until they have been assessed.
g) A qualified archaeologist will conduct an archaeological assessment of the resource. No work at that particular location will continue until the qualified archaeologist, in consultation with the Newfoundland government authorizes restarting the work.
h) In the event of the discovery of suspected human remains or a burial site, the procedures outlined below will apply:

- Work in the immediate area will be suspended, and the site environmental monitor and project manager will be notified immediately.
- If remains are found during site activities, work will stop and no equipment will be moved, as physical evidence may be destroyed. The site, including drilling equipment or heavy equipment heavy equipment, if necessary, will be secured under the direction of management with flagging tape or some other appropriate means. The suspected remains will be covered with a tarpaulin.
- Management will contact the appropriate police authority (RCMP).
- If the RCMP determines that the remains are associated with a historic burial, Exploits will contact the Newfoundland government to obtain guidance on further actions.

5.5. Forest Fire

The Bullseye Property Area is largely barrens with spruce and fir trees being stunted, referred to as tuckamore. The area is used for a range of land use activities such as hunting and fishing, camping and ATVing. Any fires originating from works areas could have serious adverse environmental effects on public health and safety and community well-being. Accidental fires can adversely affect biodiversity conservation initiatives and local and regional sustainable use of renewable resources by local communities.

Activities related to exploration, including the operation of vehicles, equipment and machinery or improperly disposed of waste materials may cause a fire that may spread to surrounding forested areas.

All precautions will be taken to prevent fire hazards when working at the site. These include but are not limited to:

a) Disposal of all flammable waste on a regular basis.
b) Just in time inventory philosophy will be used at the Exploits sites to reduce the quantities of flammable materials stored on site.

The following measures will be implemented:

a) Exploits will ensure the site is properly resourced in terms of sufficient fire suppression equipment to suit the labour force and fire hazards. Such equipment will comply with and be maintained to the manufacturer's standards.

b) Ensuring that personnel are trained in the use of such equipment.

c) In the event of a forest fire, the company will take immediate steps to contain or extinguish the fire if it is safe to do so.

d) Appointing a supervisory staff member as On-Scene-Commander for the purpose of fighting any forest fires.

e) Forest fires will be reported by the site environment monitor and site safety personnel who will coordinate any First Aid actions: emergency response procedures; and notify police, fire, and air ambulance, as appropriate.

The person reporting the fire should be prepared to provide:

- Their name and mobile phone number;
- The time of detection of the fire;
- The estimated size of the fire; and
- The location of the fire.

6. PROGRESSIVE RECLAMATION

Exploits understands the importance of preserving biological diversity in the Bullseye Property area. The area, although currently partially altered by mineral exploration activities in the past, will renew over time and Exploits will take measures to encourage the remediation of work areas.

To achieve a good knowledge base about the existing environmental conditions in the Bullseye Property area, Exploits will:

a) Characterize the physical environment and evaluate the changes in the physical environment that may adversely affect dependent biological resources.

b) Design its activities to reduce the total "foot print" or extent to which physical changes will occur.

c) Use environmental assessment methods to determine the potential damaging effects of activities on ecosystems and species and recommend ways of avoiding such adverse environmental effects or reducing such effects to acceptable levels.

d) Conduct comprehensive biological baseline studies to characterize the existing condition, including investigation for species with special conservation status or species with special uses.

e) Conduct monitoring programs to evaluate the effectiveness of mitigation measures intended to avoid or reduce potential adverse environmental effects.

f) Exploits will set aside any bulk soils or overburden removed as part of the mineral exploration activities for use in site reclamation. Such recovered areas will be re-seeded with suitable plant species.

Restoration efforts should focus on zones that are erosion prone, to stabilize the area and prevent loss of soils or sediment from entering watercourses. All graded slopes and cuts must be re-contoured to ensure stability. If any trees were damaged along the edge of the activity area, they must be felled and disposed of or pruned.

Depending on the requirements of the area, seeding and fertilizing with appropriate mixtures preapproved by Exploits must occur as soon as possible after activities. All seed must be rated as "Certified Seed", the seed mixtures, rates, application areas and fertilizer types will be approved by the Environmental Monitor. No fertilizer will be applied in drainage ditches or within 10 meters of a watercourse.

7. CONTRACTOR'S ROLES AND RESPONSIBILITIES

Every contractor is expected to:

a) Comply with all Exploits environmental policies and procedures while at the worksite.

b) Carry out their work so that environmental protection is ensured.

c) Operate in accordance with the contractor responsibility requirements outlined in the environmental protection plan.

d) Report to your immediate supervisor or person exercising management responsibilities any spills, incidents, contraventions of policies and procedures, or near misses.

e) Use equipment and procedures for environmental protection in accordance with the instructions for use and training provided.

f) Ensure that their employees are familiar with the work to done and applicable environmental plans and procedures.

g) Provide the required training to their employees in all areas necessary to ensure environmental protection.

h) Ensure that all machinery and equipment is inspected and maintained in good working condition, in terms of leaks and spills.

8. KEY CONTACT LIST

Exploits Discovery Corp.		
Nick Ryan	+1 709 746 2842	nryan@exploits.gold
Environmental Applications Group (EAG) Inc.		
John Sferrazza	+1 705 929 5245	john.sferrazza@environmentalapplications.ca
Andrew Rees	+1 705 492 2446	arees@environmentalapplications.ca
Darryl Boyd	+1 519 616 2624	dboyd@environmentalapplications.ca
Ron deGagne	+1 705 929 5440	rdegagne@environmentalapplications.ca
Monica Chant	+1 709 695 6830	mchant@environmentalapplications.ca
Consultant 1 (Quinian Exploration Inc.)		
Eddie Quinian	+1 709 541 0095	ebqmail@gmail.com
Consultant 2 (RPM Aerial Services)		
Brian Lundrigan	+1 709 746 0632	brianl@rpmaerialinc.ca
Drilling Company (Major's Drilling)		
Chris Young	+1 709 673 8893	chris.young@majors.ca
EMERGENCY		
Police (RCMP)	+1 709 256 6841	
Ambulance -Gander	+1 709 651 2111	
Air Ambulance - Gander	+1 709 777 6320	
Hospital -Gander	+1 709 256 2500	
Toll Free Health Line	+1 709 722 1110	
Poison Control	+1 877 698 3473	
Forest Fire - FLR Fire Management	+1 866 709 3473	
Environmental 24-hour Emergency NL	+1 800 563 9098 or +1 709 772 2083	
Search and Rescue – Air Distress	+1 819 997 2800	
Environment Canada	+1 800 668 6767 (24hr pager)	
Provincial Archeology Office NL	+1 709 729 2462	

9. APPENDIX A – SPILL RESPONSE FOR GASOLINE & DIESEL

Diesel

Action Step:

1. Identify spill, stop source if possible
2. Report spill
3. Contain spilled material with berms, appropriate sorbents, etc.
4. Safeguard area from disturbance or inadvertent access during cleanup
5. Remove material affected by spill or used for cleanup
6. File a spill report
7. Reclaim area

Notification:

Immediately notify the Spill Response Coordinator, or alternate, who will follow his/her responsibilities.

Initial Spill Response:

1. Stop the flow if possible.
2. Eliminate open flame ignition sources (i.e., cigarettes, motors etc.)
3. Contain flow of diesel by berming, barricading or blocking flow by any means available. Use earth-moving equipment, if immediately available.
4. Prevent spill from reaching flowing water.

Hazards:

- Toxicity Rating 3 (moderately toxic – probable lethal oral dose 0.5 – 5 g/kg)
- Flammable

Action for Fire:

- Use CO_2, dry chemical, foam or water spray (fog), **CAUTION:** water may spread fire.
- Use fog streams to protect rescue team and trapped people.
- Use water to cool the surface of tanks.
- Divert the diesel fuel to an open area and let it burn off under control.
- Beware of re-ignition if the fire is put out before all diesel fuel is consumed.

- Rubber tires are almost impossible to extinguish after involvement with a fire. Have vehicles with burning tires removed from the danger area.
- Contact with strong oxidizing agents (i.e., hydrogen peroxide, ammonium nitrate) may ignite the diesel or cause it to explode.

Recovery:

- Unburned diesel fuel can be soaked up by sand, straw, peat moss or commercial sorbents such as *Graboil*.
- Contaminated soil should be excavated, if necessary.
- Diesel fuel entering the ground can be covered by digging sumps or trenches and pumping from below the water table.
- Diesel fuel on a water surface should be collected and recovered by booms, sorbents such as *Graboil* or collected by a liquid/solid vacuum cleaner.

Disposal:

- Incineration under controlled conditions. Obtain permission.
- Burial at an approved site.

Properties:

- CAS : 8008-20-6
- Kerosene [aliphatic hydrocarbons (C_{10} to C_{16})] 99-100%, aromatic hydrocarbons and saturated rings 0-1%]
- Clear, oily liquid.
- Not soluble, floats on water.

Environmental Threat:

- Moderately toxic to fish and other aquatic organisms
- Harmful to waterfowl
- May create unsightly film on water

Containers:

- Stored in single walled, welded steel tanks.
- Store recovered material in steel drums or cubes.

Supplier:

- variable

Gasoline

Action Step:

1. Identify spill, stop source if possible
2. Report spill
3. Contain spilled material with berms, appropriate sorbents, etc.
4. Safeguard area from disturbance or inadvertent access during cleanup
5. Remove material used in cleanup
6. File a spill report
7. Reclaim area

Notification:

Immediately notify the Spill Response Coordinator, or alternate, who will follow his/her responsibilities.

Initial Spill Response:

1. Stop the flow if possible.
2. Eliminate open flame ignition sources (i.e., cigarettes, motors, etc.)
3. Evacuate the danger area.
4. Carefully consider the hazard and merits of trying to contain the spill. Contain only if it is safe to do so and if there is an obvious benefit (i.e., contain if it is flowing towards a creek). Otherwise leave gasoline to spread and evaporate. **Do not** attempt to contain a gasoline spill with water.
5. Ventilate vapours if spill occurred in an enclosed area.

Hazards:

- Toxicity Rating 3 (moderately toxic – probable lethal oral dose 0.5 – 5 g/kg). Highly toxic if aspirated.
- Highly flammable
- Forms an explosive mixture with air.
- Easily ignited by flame or spark.

Action for Fire:

- Use CO_2, dry chemical, foam or water spray (fog), **CAUTION:** water may spread fire.
- Use jet streams to wash away burning gasoline.
- Use fog streams to protect rescue team and trapped people.
- Use water to cool the surface of tanks.
- Divert the gasoline to an open area and let it burn off under control.
- Beware of re-ignition if the fire is put out before all gasoline fuel is consumed.
- Rubber tires are almost impossible to extinguish after involvement with a fire. Have vehicles with burning tires removed from the danger area.

Recovery:

- Unburned gasoline fuel can be soaked up by sand, straw, peat moss or commercial sorbents such as Graboil.
- Contaminated soil should be excavated, if necessary.
- Gasoline entering the ground can be recovered by digging sumps or trenches and pumping from below the water table.

Disposal:

- Evaporation
- Incineration under controlled conditions. Obtain permission.

Properties:

- CAS : 8008-61-9
- Petroleum aliphatic hydrocarbons (C_5 to C_{12})] 99-100%, aromatic hydrocarbons 0-1%, additive trace, tetraethyl lead 0-0.1%
- Clear liquid.
- Not soluble, floats on water.

Environmental Threat:

- Moderately toxic to fish and other aquatic organisms
- May create unsightly film on water

Containers:

- Stored in single walled, welded steel tanks.

- Store recovered material in steel drums or cubes.

Supplier:

- Variable

10. APPENDIX B – SPILL REPORTING FORM

Spill Report Form

Report Date:	Date and Time of Incident:	
Reported By:		Phone:
Location:	Co-ordinates:	
	Proximity to Watercourse (meters):	
	Approx. Depth of Water Table (meters):	
Source:		
Product/Material Spilled:	Physical State (gas/liquid/solid):	
	Quantity:	
Current Status:		
Potential Hazard:		
Action Advised/Taken:		
Cause / Comments:		
Weather Conditions:	Investigation Report Required: _____Yes _____No	

This section to be completed by Site Designate/Contact, when the spill is greater than 70 liters or spills of any volume entering a watercourse.

Outside Agency Contacts: Place an "X" next to those contacted. Provide names where required.

Police Local or Provincial: Fire: Paramedics:

Service NL Name & Title of Contact:

If spill within 300m of a Watercourse or where the Water Table is shallow the Service NL & DFO) should be contacted. Service NL & DFO Name & Title of Contact:

Note:
Copies of the completed spill reports have to remain at site and be sent to the Exploits Corporate for review and filing.

11. APPENDIX C – DRILL SITE ENVIRONMENTAL CHECKLIST

Exploration Drill Inspection Checklist – Bullseye Property

Deposit:	Drill Hole Collar ID:	Drill #:	UTM Coordinates (NAD 83 Z 21N):	Date/Time:
Weather:	Driller:	Helper:	EAG Inspector:	

INSPECTION CRITERIA:	Satisfactory	Unsatisfactory	Action Required	Responsibility	Comments	A, B, or C item
Trails and Individual Drill Sites - Preparation Methods						
Was vegetation stripped?						
Overburden stripped and removed?						
Excessive or Necessary?						
Rehabilitation Required?						
Was topography restored and organics redistributed?						
Sump - Double____Single ____						
Sump levels acceptable?						
Evidence of overflowing from sumps into natural environment?						
Evidence of oil or other materials in sump?						
Slimes contained to upper sump?						
Straw bales in use where required? - Condition of bales?						
Stability of sumps, reinforcement of sump (dam) walls required?						

Drill Area						
Spill Procedure posted?						
Spills of fluid (oil and grease)?						
Spill Kit - stocked and ready for use?						
General tidiness - garbage contained and disposed of properly?						
Fluids Storage - Labelled containers? Stored on drip trays/pans?						
Fuel Storage						
Double walled tank? Condition of tank acceptable?						
Nozzle storage acceptable?						
Location of tank acceptable - min. 10m from high water mark?						
Spill Kit - stocked and ready for use?						
Drill Water Supply Area						
Pump shack >4m from stream/river/pond/lake?						
Impact from water taking – exposed riparian zone?						
Spills of fluid (oil and grease) on site?						
Spill Kit – stocked and ready for use?						
General tidiness – hoses coiled, garbage picked up?						
Are drip trays/pans in use? Drip trays lined with matting?						
Other						
Is drill discharge (waterborne drill cuttings and additives) being prevented from entering a waterbody? Method?						
Are water pumps underlain with drip trays line with absorbent pads?						
Are the water pads being changed before becoming saturated?						
Are drill casings that produce water capped?						
Upon completion of drilling, have drill casings that produce water been sealed (grouted)?						

After completion of drilling, inspect the site for spills of hydraulic, oil, drill, grease, garbage, and waste material. If present, have these items been cleaned-up?						
Has any contaminated soil been excavated, disposed of at an approved waste facility?						
If so, was the spill immediately reported?						
Are washing, refueling, servicing of machinery, and storage of fuel and equipment being conducted in a manner to prevent deleterious substances from entering water bodies?						
Do water depths submerge axle or differential vents?						
Additional Comments:						

Notes:
A: Any condition or practice with potential for permanent environmental damage or is out of compliance with government regulations.
B: Any condition or practice with potential for serious environmental damage.
C: Any condition or practice with probable potential for environmental damage.

EXIT SUMMARY

DRILL COMPLETION SUMMARY	YES	NO	COMMENTS
Drill site is free of hydrocarbons:			
Drill site is free of rubbish:			
Drill hole is plugged:			
Sump is backfilled with drill cuttings buried:			
Hay/silt fencing removed:			
Environmental issues encountered during drill (hydrocarbon spills, reject water release) and mitigation measures employed:			
Drill site remediation completed:			
Photograph of remediated drill site captured:			

PHOTOGRAPH OF REMEDIATED DRILL SITE

SIGNATURE / SIGN-OFF		
ROLE	**NAME**	**SIGNATURE**
Driller		
EAG Inspector	Wade Mullins	
Exploits Discovery Group Representative		

12. APPENDIX D – PERMITS & APPROVALS

Government of Newfoundland and Labrador
Department of Industry, Energy and Technology
Mineral Lands Division

December 5, 2022

E220602

Nick Ryan
nryan@exploits.gold

Dear Mr. Ryan:

Exploration Approval
(54 DDH, Airborne Geophysics,
Ground Geophysics, Geochemical Survey,
Prospecting and Geochemistry)
for Exploits Discovery on the
Bullseye Property;
NTS: 2E/02, 2D/15;
Licence: 035151M

Your proposed exploration program submitted in compliance with Section 5(4) of the **Mineral Act** has been reviewed and approved.
Note that the following conditions, which are categorized based on the scope and location of exploration work, apply:

General Conditions

1. The Proponent, its employees, agents and subcontractors ("Proponent") shall comply with the Mineral Regulations, in particular sections 41 – 45. The Mineral Regulations can be read at: http://assembly.nl.ca/legislation/sr/regulations/rc961143.htm

2. This approval may be cancelled or suspended by the Minister if the Proponent fails to comply with any condition in this approval or as a result of a failure to comply with the Mineral Act, Mineral Regulations or any other provincial law or regulation. Upon cancellation or suspension of this approval the Proponent shall immediately cease all exploration activities.

3. The Proponent shall comply with any other Provincial and Federal act or regulation, and obtain all permits that may be required in connection with the exploration activity.

4. As required by Section 42 of the Mineral Regulations, the Proponent shall notify the Mineral Lands

Division of any significant changes to the approved exploration plan, and shall not proceed with exploration work, preparatory work or site access that deviates substantially from the approved exploration plan or deviates from the approved exploration plan in a manner which may significantly impact the environment without first receiving written authorization from the Mineral Lands Division.

5. The Proponent shall provide the Mineral Lands Division with:
   - A brief notice immediately before beginning the work;
   - A brief update of the status of the exploration program when it is completed.
   - Notices and updates should be sent to exploration_approval@gov.nl.ca

6. At any time the Mineral Lands Division may issue a request for information regarding completed, ongoing or planned exploration and the Proponent agrees to abide by all such requests without undue delay. The information requested may include but is not limited to: the location of exploration sites (including access trails), site preparation methods, the status of rehabilitation and cleanup, and photographic documentation of site conditions.

7. If exploration work is to take place on lands not vested in the Crown, as per section 12(2) of the **Mineral Act**, the licencee shall obtain prior written permission and forward copies to the Mineral Lands Division. Information regarding private land may be found on Crown Lands' Land Use Atlas: https://www.gov.nl.ca/landuseatlas/details/

8. Exploration work, including traditional prospecting, shall not be carried out on ground for which the mineral rights are held by another party unless permitted by an agreement registered with the Mineral Claims Recorder's office or unless written permission from the other party has been forwarded to the Mineral Lands Division. The Department's Geoscience Atlas is a current map of mineral rights held in the province. The Geoscience Atlas is located at: http://gis.geosurv.gov.nl.ca/

9. The Proponent shall ensure that all waste materials are placed in suitable refuse containers without undue delay and removed to a waste disposal site approved by Service NL to accept the type(s) of waste being disposed of. Digital Government and Service NL Government Service Centres are listed at: https://www.gov.nl.ca/dgsnl/department/contact/#locations

10. The modernized **Fisheries Act** (2019) includes fish and fish habitat protection provisions which came into effect on August 28, 2019. If you are conducting work in or near water you should refer to the Projects Near Water website (http://www.dfo-mpo.gc.ca/pnw-ppe/index-eng.html) to get information about how to comply with the **Fisheries Act** and as well as information on the project review process.

    You are responsible for:
    - understanding the impacts your project will likely have on fish and fish habitat;
    - taking measures to avoid and mitigate impacts to fish and fish habitat;
    - requesting an authorization from the Minister and abiding by the conditions of your authorization when it is not possible to avoid and mitigate project impacts on fish and fish

habitat;
- ensuring compliance with all statutory instruments, including federal, provincial, or municipal legislations/requirements.

In cases where impacts to fish and fish habitat cannot be avoided, and the project does not fall within waterbodies where a Fish and Fish Habitat Protection Program (FFHPP) review isn't required or the scope of the project is not covered under standards and codes of practice (https://www.dfo-mpo.gc.ca/pnw-ppe/practice-practique-eng.html), you are asked to submit a **Request for Review** (https://www.dfo-mpo.gc.ca/pnw-ppe/reviews-revues/request-review-demande-d-examen-004-eng.html) to the NL Region-FFHPP at FPP-NL@dfo-mpo.gc.ca. If you have any questions please call (709) 772-4140.

11. As per Section 38 (5) of the **Fisheries Act**, every person has a duty to notify DFO of an occurrence that results in serious harm to fish, or the deposit of a deleterious substance in water frequented by fish. Should such an occurrence take place, the Proponent shall contact DFO at 709-772-4140 or FPP-NL@dfo-mpo.gc.ca.

Use and Storage of Petroleum Products

12. All fuel storage containers (e.g., jerry cans, fuel drums, etc.) and water pumps shall be underlain by effective secondary containment (e.g., a drip tray) lined with absorbent pads. Absorbent pads shall be changed before becoming saturated. Secondary containment where the containment rim is broken or otherwise ineffective must be replaced or placed within additional containment (e.g., a tarp-lined wooden tray) without delay.

13. Petroleum product spills into or near a water body and petroleum product spills greater than 70 litres (or of an uncertain volume) on land must be reported without delay to Service NL by calling the Environmental Emergency 24-hour line at 772-2083 or 1-800-563-9089. In order to ensure that a quick and effective response to a spill event is possible, spill response equipment and absorbent materials should be readily available on-site.

14. The Proponent shall wash, refuel and service machinery and store fuel and other materials for the machinery in such a way as to prevent any deleterious substances from entering the water. Water depths should not submerge axle or differential vents.

Agriculture

15. The area of application partially overlaps an Agriculture Area of Interest (AOI), although there are no concerns with the proposed activities at this time.

Corner Brook Pulp & Paper Timber Licences

16. The proponent is advised to contact Corner Brook Pulp and Paper Limited (CBPPL) to discuss the proposed work taking place within CBPPPL timber licences with the goal of determining an acceptable mitigation, rehabilitation, or compensation plan that would minimize the impact on

silviculture and forest resources. Contact Faron Knott at Faron.Knott@kruger.com; 709-637-3155.

Forestry

17. The application area is located on Corner Brook Pulp & Paper Limited (CBPPL) land tenure and requires consultation with and approval from CBPPL prior to any work commencing.

18. The Proponent shall comply with the **Forestry Ac**t and regulations. The Proponent is advised to contact the nearest Forest Management District Office to obtain the following permits as required:
    - a commercial harvesting permit before the start of the exploration program if trees have to be cut for access to exploration sites. Please note that it may take up to two weeks to receive this permit;
    - an operating permit if operations are to take place on forest land during the forest fire season (May-September);
    - During the Forest Fire Season a permit to burn must be obtained to ignite a fire on or within 300 meters of forest land.

    Regional and Satellite Forestry contact information can be found at:
    http://www.flr.gov.nl.ca/department/contact_forestry.html#regional

    Forestry Management Districts and zone boundaries are shown on the Fisheries, Forestry and Agriculture (FFA) GeoHub:
    https://geohub-gnl.hub.arcgis.com/app/forestry-management-districts-and-zones-of-newfoundland-and-labrador

Water Resources

19. The proponent must apply for and obtain a permit under the **Water Resources Act**, 2002, specifically Section 48 http://assembly.nl.ca/Legislation/sr/statutes/w04-01.htm for any work in any body of water (including wetland) prior to the start of the work.

    Application forms for working within a body of water can be found online at:
    https://www.gov.nl.ca/ecc/waterres/regulations/appforms/

Crown Lands & Land Management

20. There are a number of issued Crown titles in this area. If work is to take place within these issued title sites, permission from the land owner is required.

21. There may be private land located within this area which may not be on record with the Crown Lands Office. If work is planned on these private land sites, permission is required from the land owners.

22. Access is not to be blocked.

23. Access routes are considered trails if timber is cut and no other ground disturbance is undertaken. Equipment used on trails would be tracked or high flotation tired equipment, operating directly on the root mat with sufficiently low ground pressure to prevent rutting and soil compaction. Crown Lands does not require application for trails on non-wetland sites.

24. Disturbance of root mat and exposure of mineral soil by cut and fill using an excavator or other bladed equipment for access is considered road construction. Crown Lands requires application for road construction. The visible presence of a vegetation covered linear feature on the landscape does not mean the feature was once a road, or that the feature is available for upgrading without application. Forest access roads may be in various condition, depending upon the period since last used commercially, construction methods used, and specific site conditions. Culverts, bridges and ditching may also be in various states or completely absent. Roads may be considered completely regressed and no longer considered for upgrade without an application in cases where the route is overgrown and not possible by ATV or snowmobile.

25. Forest extraction trails often appear as linear features on imagery. These extraction trails are not roads and the root mat was not intended to be disturbed on these. These are considered trails and will require application for use as a road.

26. Approximate locations of Crown Land titles can be viewed on the Public Land Inquiry map viewer here: https://www.gov.nl.ca/landuseatlas/inquiry/

27. If new road construction is required, the proponent must complete an application for Crown land and it must be approved prior to road construction. The application, and related information can be found at: https://www.gov.nl.ca/ffa/lands/applications/

28. The proposed activities are not to encroach on existing titles and the proponent should keep the safety of cottage owners and other recreational users in mind during exploration activities.

Municipal and Provincial Affairs

29. The subject location is within a jurisdiction absent land use controls. The subject property is within proximity to the Municipalities of Appleton and Glenwood and as such the Municipal Council(s) should be informed of development activity which may have impact within their municipal boundaries or planning areas. However, municipal notification is not a legislative requirement under the **Urban and Rural Planning Act**, 2000.

30. The property intersects with the Gander River System which is a Scheduled Salmon River. Any undertaking as defined by the **Environmental Assessment Regulations**, 2003 under the **Environmental Protection Act, 2002** within 200 meters of the high watermark of the river or tributaries as listed under 2(a)(i) below must be registered for Environmental Assessment.

Environmental Assessment Division

31. This application was referred to the Environmental Assessment Division and it has been

determined that registration is NOT required under Section 47 of the **Environmental Protection Act,** SNL 2002, cE-14.2.

32. Please be aware that the Environmental Assessment Division must be notified of any significant changes to the undertaking. All proponents are required to comply with all relevant legislation including permits and approvals from this Department of Environment and Climate Change and any other municipal, provincial or federal regulatory authorities.

Provincial Archaeology Office

33. The Provincial Archaeology Office has reviewed and approved this referral on the basis that **a 100m buffer is maintained on Gander River** where no ground-disturbing activities are permitted.

34. Please be advised on the provisions of the **Historic Resources Act***,* protecting archaeological sites, artifacts and significant fossils, and procedures to be followed in the event that either are found:

    a) A person who discovers an archaeological object or significant fossil in, on or forming part of the land within the province shall report the discovery forthwith to the Minister (responsible for the **Historic Resources Act**) stating the nature of the object, the location where it was discovered and the date of discovery;
    b) No person other than one to whom a permit has been issued under this Act, who discovers an archaeological object or significant fossil shall move, destroy, damage, deface, obliterate, alter, add to , mark or in any other way interfere with, remove or cause to be removed from the province that object or fossil;
    c) The property in all archaeological objects or significant fossils found in, on or taken from the land within the province, whether or not these objects or fossils are in possession of the Crown is vested in the Crown.

    Should any archaeological remains be encountered, such as stone, bone or iron tools, concentrations of bone, charcoal or burned rock, fireplaces, house pits and/or foundations, activity in the area of the find must cease immediately and contact should be made with the Provincial Archaeologist in St. John's (709-729-2462) as soon as possible.

    Copies of the **Historic Resources Act** and information on archaeology in the province may be obtained from the Provincial Archaeology Office upon request.

Wildlife

35. The Wildlife Division advises applicants to operate under established legislation and regulations, such as to prevent harassment of wildlife (Section 106 of the **Wild Life Regulations** under the **Wild Life Act**) and guidance with respect to wildlife and their habitats (e.g. nesting birds, caribou, waterfowl, wetlands, inland fish, rare plants, riparian species) to avoid or minimize adverse impacts.

    Pursuant to Section 106 of the **Wild Life Regulations:**

a. A person shall not operate an aircraft, motor vehicle, vessel, snow machine or all-terrain vehicle in a manner that will harass any wildlife;
b. You are advised that helicopter supported exploration programs must be conducted in a manner that does not disturb, harass or harm any animal life that you encounter. This can easily be accomplished by avoiding concentrations of wildlife by rescheduling the planned activities for another day.
c. Under no circumstances should nesting raptors be approached, not even for a "harmless" look. The startle effect that helicopters have on nesting raptors can be detrimental and therefore either a 600 m horizontal buffer from cliff faces or an altitude of 300 m must be observed.

No vegetation clearing is to occur within 800 metres of a bald eagle or osprey nest during the nesting season (March 15 to July 31) and 200 metres during the remainder of the year. The 200m buffer also applies to all other raptor nests (e.g. Northern Goshawk, Sharp-shinned Hawk, Merlin, American Kestrel, Great-horned Owl, Boreal Owl, Northern Saw-whet Owl). The location of any raptor nest site must be reported to the Wildlife Division.

The Wildlife Division requires a minimum 30 m naturally vegetated buffer to be maintained along all waterbodies and wetlands greater than 1 m in width or appears on a 1:50,000 scale NTS map to protect sensitive riparian and aquatic species, and their habitat.

The **Migratory Birds Convention Act, 1994**, **Migratory Bird Regulations**, **Wild Life Act** and **Wild Life Regulations** protect birds and prohibit the disturbance or destruction of bird nests and eggs in Newfoundland & Labrador. Proponents are advised to develop and implement appropriate preventative and mitigation measures to avoid incidental take of birds, nests and eggs.

Proponents must adhere to the **Motorized Snow Vehicle and All-Terrain Regulations** under the **Motorized Snow Vehicle and All-Terrain Ac**t (O.C.96-240)
http://www.assembly.nl.ca/legislation/sr/regulations/rc961163.htm

The proponent must follow appropriate hunting and trapping protocols as set in the annual Hunting and Trapping Guide. Proponents are advised to develop and implement appropriate preventative and mitigation measures to avoid incidental take of wildlife species.

This approval is due to expire on December 5, 2023.

If you have any questions concerning this approval, please contact the Mineral Lands Division at exploration_approval@gov.nl.ca

Regards,

Bernadine Lawlor
Exploration Approvals Geologist

Cc: Kevin Sheppard, Director, Mineral Lands Division
Dale O'Reilly, Mineral Incentive Geologist
Jamie Brake, Provincial Archaeology Office

FOREST SERVICE OF NEWFOUNDLAND AND LABRADOR

Place: Gambo
Date: 1/12/2023

OPERATING PERMIT

ISSUED UNDER SECTION 105 OF THE FORESTRY ACT

In accordance with the **Forest Fire Regulations**, Exploits Discovery Corp. (Nick Ryan) of

131 Row Avenue, Gander NL Phone #: 709 746-2842 Is granted permission to carry out

A logging or industrial operation during the 2023 Forest Fire Season on Crown/Private land located at

Bullseye Property Mineral Lands E220602, Cutting Permit 23-05-00504

Issued by: _____
On behalf of the
Minister of Fisheries and Land Resources

OPERATING PERMIT CONDITIONS

1. The permittee must follow all relevant sections of the Forest Fire Regulations. These regulations can be found at - https://www.assembly.nl.ca/Legislation/sr/regulations/rc960011.htm.
2. Forest fire suppression equipment as specified in the Forest Fire Regulations or any deviations as specified by a Forestry official must be located at the operating site of all operations and maintained in good working order.
3. In the event of a move to a new operating site written notification on the location of forest fire suppression equipment is to be provided to the Forestry office issuing this permit.
4. Inspection(s) will be carried out to determine if the location of forest fire suppression equipment is suitable.
5. A copy of the operating permit must be on the operating site and must be shown when requested by a Forestry official.
6. This permit may be temporarily suspended by a Forestry official if the Fire Weather Index rises to high, very high or extreme in the locality of operations.
7. This permit may be cancelled at any time by a Forestry official.
8. Where this permit is suspended or cancelled and the permittee continues operations, the permittee will be liable on summary conviction to a fine of not less than two hundred dollars for every day or part of a day that operations continue in violation on the notice of suspension or cancellation.
9. A person who fails to comply with the provisions of this permit is guilty of an offence and subject to such penalty as prescribed by *The Forestry Act*.
10. This permit is not transferable.
11. Other conditions as attached or below:

_____

_____

_____

_____

Government of Newfoundland and Labrador
Fisheries, Forestry and Agriculture
Forestry Branch

COMMERCIAL CUTTING PERMIT 2023

Permit Number :23-05-00504

Eastern	05	Gander	Miscellaneous-Gander	2023/01/12
Region	District	Zone	W.C.	Date Issued

Under and by virtue of The Forestry Act , Permission is hereby granted to:

Name:	**Nick Ryan**	Phone:	**(709) 746-2842**
Address:	**Exploits Discovery Corp** **131 Roe Avenue** **P.o. Box 159**	Driver's Licence #:	**R210802020**

To cut timber to the conditions and restrictions as stated below:

Total Volume to be harvested:	softwood	**10**m^3
	hardwood	**10**m^3

Stumpage Rates:

Fuelwood solid	$5.56 per m3
Pulpwood solid	$5.56 per m3
Sawlogs (m3)	$5.56 per m3

Location where timber is to be cut: **As Per Mineral Lands E220602**
Location where timber must be piled for scaling: **Roadside**

Standard Conditions:

- All Commercial Cutting Permit holders must have prior written approval from forestry officials, before moving harvesting operations to alternate operating areas identified within this permit.
- All harvesting equipment must be equipped with a fully–charged, 4.5 kilogram fire extinguisher at all times.
- During the cutting and removal of timber, permit holders must adhere to all requirements of the Departments ISO 14001:2015 Environmental Management System, all Standard Operating procedures and Emergency Response procedures.
- All equipment associated with harvesting operations conducted under this commercial cutting permit, shall be removed from the operating area upon permit expiry, unless otherwise agreed to by a Forestry Official.
- Cutting is NOT permitted within 100 metres of the centerline of any routed highway unless permission is provided under a special condition of this permit.
- The cutting of White Pine (Pinus strobus) or Red Pine (Pinus resinosa), regardless of tree condition (i.e. dead or alive, standing or felled) is NOT permitted unless express permission has been provided by the District Ecosystem Manager or designate.

Special Condition: Conditions as per E220602/License 035151M
Merchantable timber to be utilized and royality paid

This permit is effective starting: **2023/01/12** and expires **2023/12/31**
Fee for the issuance of this permit is: **$50.00**
Payment Method: **Visa**

L Holloway

FORESTRY OFFICIAL