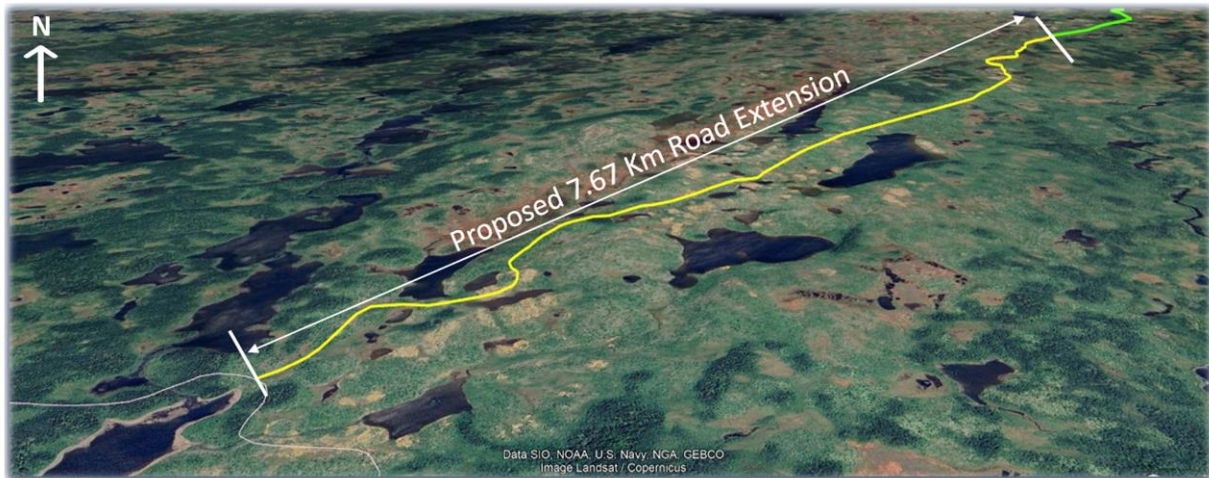


PIPESTONE XL NICKEL PROJECT

7.67 KILOMETER MINERAL EXPLORATION ACCESS ROAD EXTENSION

Environmental Assessment Registration Document



Submitted by:



P.O. Box 209
Buchan's, NL
A0H 1G0

Prepared By:

Pearce Bradley, P.Geol.
First Atlantic Nickel Corp
P.o. Box 242,
Badger, NL
A0H 1A0

April 25, 2024

Table of Contents

1.0	NAME OF UNDERTAKING	1
2.0	PROPONENT	1
2.1	Name of Corporate Body	1
2.2	Newfoundland Regional Address	1
2.3	Chief Executive Officer.....	1
2.4	Principal Contact Person	1
3.0	THE UNDERTAKING.....	2
3.1	Nature of the Undertaking	2
3.2	Purpose, Rationale & Requirement for the Undertaking	2
4.0	DESCRIPTION OF THE UNDERTAKING.....	7
4.1	Geographic Location and Geology.....	7
4.1.1	Geographic Location.....	7
4.1.2	Geology.....	10
4.2	Physical Features	13
4.2.1	Project Site Description	13
4.2.2	Existing Biophysical Environment.....	16
4.3	Construction and Maintenance.....	19
4.3.1	Road Construction.....	19
4.3.2	Culverts and Bridges.....	20
4.3.3	Road Maintenance	20
4.4	Potential Sources of Pollution During Construction and Maintenance.....	21
4.4.1	Air.....	22
4.4.2	Noise.....	22
4.4.3	Domestic Waste and Sewage.....	22
4.4.4	Fuel.....	22
4.4.5	Effluent	23
4.5	Potential Resource Conflicts During Construction and Maintenance.....	24
4.6	Occupation.....	25
4.7	Reclamation and Closure	26
5.0	APPROVAL OF THE UNDERTAKING.....	26
6.0	SCHEDULE.....	27

7.0	FUNDING	27
8.0	CONCLUSION.....	28
9.0	REFERENCES	30

List of Figures

Figure 3-1	Regional Location of the Pipestone XL Property	3
Figure 3-2	Pipestone XL property and proposed road location	4
Figure 4-1	Location of human receptor with respect to the proposed road extension	9
Figure 4-2	Tectonic Subdivisions of Newfoundland	11
Figure 4-3	Property geology - Pipestone Pond Ophiolite Complex.....	12
Figure 4-4	Location of proposed drill hole collars along or proximal to the proposed road extension.	14
Figure 4-5	Newfoundland eco-regions for the Atlantic Nickel Property	17

List of Plates

Plate 4-1	Venator Borealis Inc. No. 62775 – Sitdown Pond Cabin	8
-----------	--	---

List of Tables

Table 5-1	List of referral agencies, responses and possible permits required.	27
-----------	--	----

LIST OF APPENDICES

Appendix A – List of Mineral Licenses

Appendix B – Exploration Permit No. E240536

Appendix C – Environmental Registration No. 2326

- i. Minister's Decision letter
- ii. Attachment A – Conditions of Release
- iii. Attachment B – Regulatory Advice

1.0 NAME OF UNDERTAKING

Pipestone Mineral Exploration Access Road

- Crown Lands Licence to Occupy Identification
Application No. 164977
- Environmental Assessment Registration Identification
File Reference No. 200.20.3625

2.0 PROPONENT

2.1 Name of Corporate Body

First Atlantic Nickel Corp.

2.2 Newfoundland Regional Address

Mr. Michael Piller, B.Sc. (Hons).
Project Geologist & Manager
P.O. Box 209
Buchan's, NL
A0H 1G0
Telephone: 709-572-9657
Email: mike@fanickel.com

2.3 Chief Executive Officer

Mr. Adrian Smith, P.Geol.
CEO & Director
Suite 1890 – 1075 West Georgia St
Vancouver, BC
V6E 3C9
Telephone: 604-781-0224
Email: adrian@fanickel.com

2.4 Principal Contact Person

Mr. Pearce Bradley, P.Geol.
Exploration Geologist
P.O. Box 209
Buchan's, NL
A0H 1G0
Telephone: 403-512-3192
Email: pbradtelus@gmail.com

3.0 THE UNDERTAKING

3.1 Nature of the Undertaking

The proposed project, herein referred to as the Pipestone Access Road Extension Project, is a 7.67-kilometer gravel access road covered under Crown Lands Licence to Occupy, application number 164977. The project area is located in central Newfoundland (Figure 3.1), with its proposed north starting point and south ending point at 59.5 kilometers and 66.7 kilometers, respectively, southwest of the Town of Grand Falls – Windsor, NL (Figure 3.2). The proposed route has been previously approved as an exploration access trail (Exploration Permit No. E250235 – Appendix B).

The proposed road will commence at a point 0.070 kilometers northeast of the northern end of Pipestone Pond and will continue for a distance of 7.67 kilometers in a northeast direction, terminating at the southern end of the approved Atlantic Lake to Gulp Pond Area Access Road (Application/ Title No.:163051 Folder RSN: 269614/ EA Registration No. 2326 – Released from EA on December 5, 2024, see Appendix C). The proposed road right of way is 20 meters wide with the road width being 5 meters and occupying the center of the proposed right of way.

3.2 Purpose, Rationale & Requirement for the Undertaking

In 2024 First Atlantic Nickel Corp carried out a reconnaissance style helicopter supported exploration program on its Atlantic Nickel Property. The targeted area extended from Atlantic Lake in the north to Pipestone Pond in the south, covering a distance of approximately 25 kilometers of the 30 kilometer long highly prospective nickel bearing belt. The Gulp Pond Nickel Prospect, discovered by Cliffs Resources/ Altius Minerals in 2011/12 was a drill ready target, and as a result, First Atlantic Nickel Corp, in 2024, acquired the approval to construct a 14.37 km road to gain access to this target area (Application/Title No.:163051 Folder RSN: 269614/ EA Registration No. 2326). However, during the course of the 2024 helicopter supported reconnaissance exploration program, First Atlantic Nickel Corp made a significant new nickel discovery in the Pipestone Pond area, located approximately 7 kilometers further south of the Gulp Pond Nickel target. The newly discovered nickel zone is called the RPM zone.

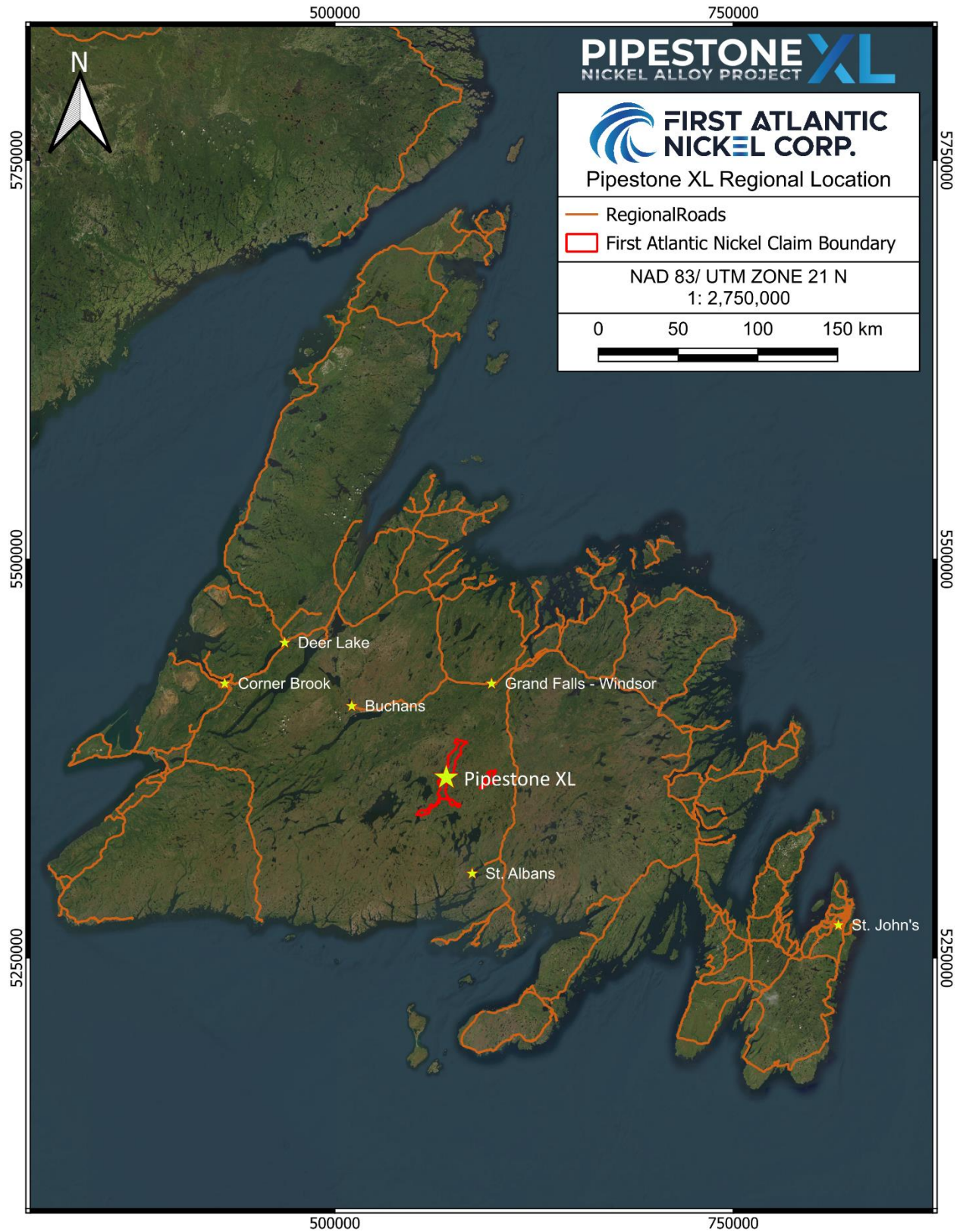


Figure 3-1 Regional Location of the Pipestone XL Property

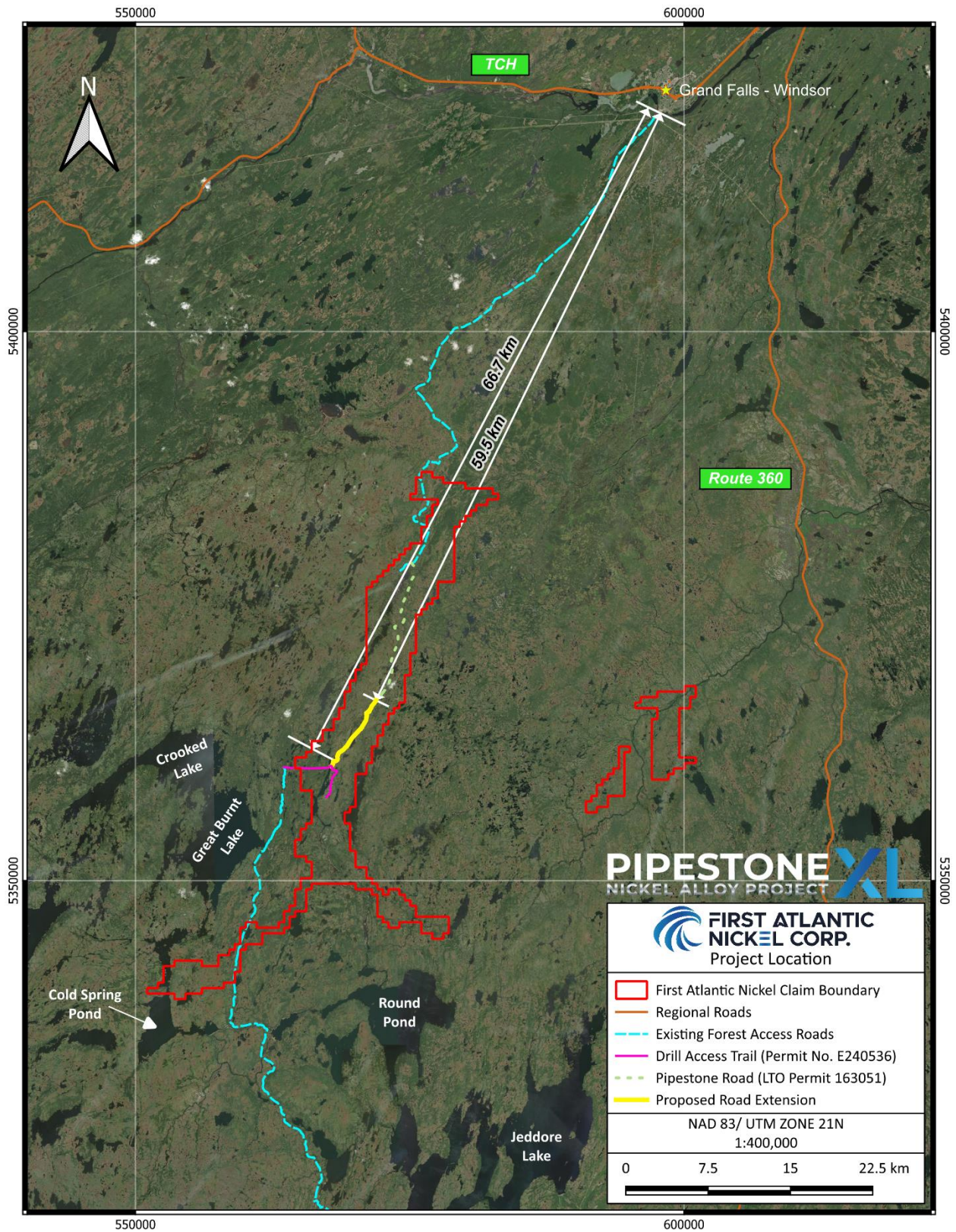


Figure 3-2 Pipestone XL property and proposed road location

The purpose and rationale of this project is to construct a 7.67-kilometer-long road extension of the currently approved Atlantic Lake to Gulp Pond Area Access Road (Application/Title No.:163051/ Folder RSN: 269614/ EA Registration No. 2326). The successful completion of this road extension will provide truck, ATV and drill access to First Atlantic Nickel Corp's newly discovered RPM zone.

The primary purpose of the undertaking is to extend the Atlantic Lake to Gulp Pond access road an additional 7.67 kilometers south to link the newly discovered RPM nickel zone with the Town of Grand Falls – Windsor, located approximately 67 kilometers to the north. This link will facilitate safe, secure, reliable, and efficient exploration activity at the RPM Zone and allow for cost effective exploration activity along the roughly 30-kilometer-long nickel belt.

The potential of the project is considered high for the discovery of a large tonnage / low grade nickel deposit, like the Baptiste Nickel Deposit in British Columbia. The Baptiste deposit reports current nickel reserves at Indicated 1815 MT @ 0.129% magnetically recoverable nickel (2435 kt nickel) and Inferred 339 Mt @ 0.131% magnetically recoverable nickel (444 kt nickel). The geological and geophysical similarities between the Baptiste Nickel Deposit in British Columbia and First Atlantic Nickel Corps Pipestone XL Nickel Project are striking. Sampling to date, on the property, has identified a 30-kilometre core trend of awaruite (Ni_3Fe) mineralization along the Pipestone Pond Ophiolite Complex. First Atlantic Nickel holds a total of 874 claims, totalling 21,850 hectares centred over the ultramafic portion of the ophiolite complex (Appendix A – List of Mineral Licenses).

First Atlantic Nickel Corp, during 2026 and beyond, are planning to continue its diamond drilling programs to fully delineate the RPM Nickel Zone to a resource category and to drill test other targets that have been identified. In addition, First Atlantic's property wide exploration activities will continue along the 30-kilometer long highly prospective nickel belt. Ground exploration work will consist of geological mapping, prospecting and bedrock sampling. A proper gravel access road to facilitate safe and efficient transportation of field crews, equipment and materials to the various work areas is a crucial component of First Atlantic's mineral exploration program.

The proposed undertaking allows ground access for secure, sustainable exploration activities, thus reducing the potential environmental footprint, while facilitating the expeditious and timely completion of contractual obligations during suitable seasonal weather conditions. It can also aid

emergency response teams by providing easy access to the exploration sites in case of accidents or other emergencies.

The deposit model for the Pipestone XL Nickel Project differs drastically from typical nickel magmatic sulphide deposits. The Pipestone XL nickel project is focused on awaruite (Ni_3Fe), which forms as a byproduct of the geological serpentinization process that alters ultramafic rocks. There are major positive environmental implications related to the two key differences between awaruite deposits and traditional magmatic sulphide deposits.

First, are the target minerals themselves. Magmatic nickel sulphide deposits mine a mineral called pentlandite (Ni_9S_8) which contains sulphur that must be burned off through an expensive, energy intensive smelting process. Even though modern scrubbers have reduced the volume of toxins released into the atmosphere, it is far from a perfect process. In comparison, awaruite is a dense, highly magnetic mineral that lacks sulphur in its chemical structure. Awaruite can be separated efficiently through a magnetic circuit and bypass traditional smelting altogether.

The second key difference is the waste rock. Magmatic sulphide deposits contain variable quantities of other sulphide minerals in the waste rock that are generally acid generating. This requires specialized and monitored waste piles to ensure that natural leaching doesn't reach waterways and other sensitive ecosystems. The nickel bearing ultramafic rocks at First Atlantic's Pipestone XL property contains only trace amounts of sulfides and will not pose any issue with respect to acid-generating waste piles like traditional magmatic nickel sulphide deposits. Additionally, ultramafic rocks are known to naturally sequester atmospheric CO_2 through the formation of carbonate minerals when natural constituents such as brucite ($\text{Mg}(\text{OH})_3$) react with air. Due to this naturally occurring reaction which will naturally sequester atmospheric CO_2 , combined with the lack of smelting and release of toxins into the atmosphere, awaruite deposits have the potential for low, or even neutral carbon footprints.

4.0 DESCRIPTION OF THE UNDERTAKING

4.1 Geographic Location and Geology

4.1.1 Geographic Location

The proposed road extension construction project is located in central Newfoundland and centered at approximately 63.2 kilometers south of the Town of Grand Falls – Windsor (Figure 3.2), at UTM coordinates 570035.00 m E/ 5363317.00 m N, (NAD83 / Zone 21 map projection). The proposed undertaking is located in the northeastern corner of 1:50,000 scale NTS Map Sheet 12A/08 (Great Burnt Lake). The area is remote but can be accessed by travelling a distance of 74.2 kilometers northwest from the Town of St. Alban's, along NL Hydro's gravel access road leading to the Upper Salmon Hydro Project's Great Burnt Dam. After crossing the dam, the proposed road extension (south end), can be accessed via travelling north from the dam for approximately 7.6 kilometers along a pre-existing access road and then turning east onto First Atlantic's exploration access trail (Exploration Permit No. E240536) for 4.4 kilometers (Figure 3.2).

The route for the proposed Pipestone access road extension is privileged with having no transmission lines, no buried underground communication lines, no designated hunting buffer zones, no cabin owners, and no crown land titles.

The closest sensitive human receptor is a cabin located 3.74 kilometers southeast of the south end of the proposed 7.67 km road extension (Figure 4.1). The cabin is located on Crown Land Lease Title No. 62775 (as referenced in the NL Land Use Atlas) and located on the western shore of Sitdown Pond. Plate 4-1 is a photo of the cabin, taken on September 14, 2025, during helicopter reconnaissance exploration work in the area. The physical appearance of the cabin indicates that it has not been maintained and/ or occupied for quite some time.

There is no line of site between the proposed road project and the cabin. Noise from vehicle travel along the proposed new access road will not be an issue to any potential occupants of the referenced cabin.



Plate 4-1 Venator Borealis Inc. No. 62775 – Sitdown Pond Cabin - Photo taken September 14, 2025

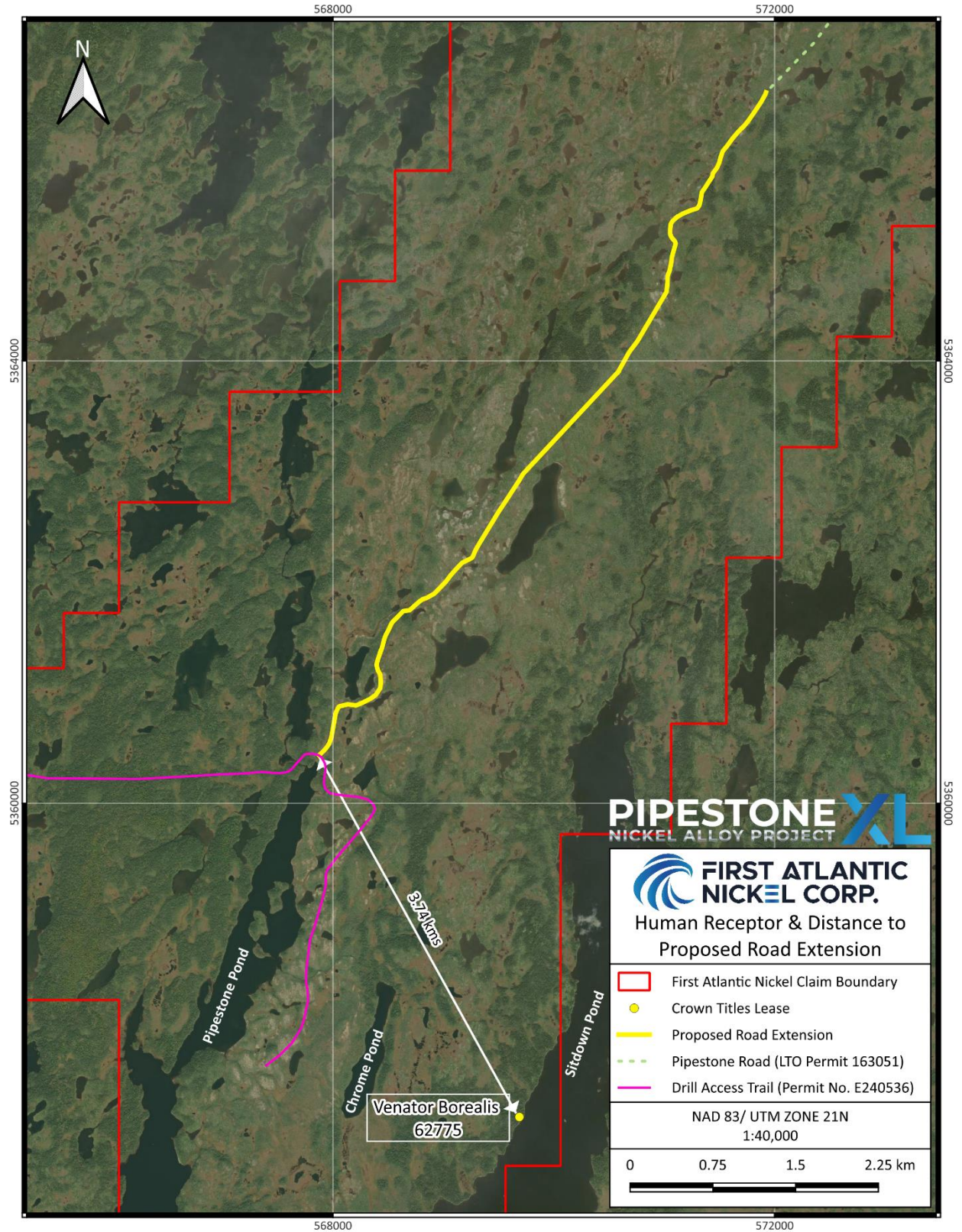


Figure 4-1 Location of human receptor with respect to the proposed road extension

4.1.2 Geology

The island of Newfoundland constitutes the north-eastern terminus of the Appalachian Orogenic Belt, which extends for over 3000 km along the eastern seaboard of North America (Colman-Sadd, 1984; Hatcher, 2010). The formation of the Newfoundland Appalachians is generally described with respect to the development and destruction of the late Neoproterozoic to early Paleozoic (600-400 Ma) Iapetus Ocean (Dunning et al., 1990).

The Newfoundland portion of the Appalachian Orogenic Belt has been subdivided into four major tectonostratigraphic subdivisions as outlined on Figure 4.2. The Gander and Avalon zones form the eastern part of Newfoundland. The Gander Zone is characterized by Cambrian and early Ordovician clastic rock sequences deposited on early Cambrian, Proterozoic and Archean basement rocks (Pollock et al., 2007). Avalonia is built from arc related volcanic-sedimentary and plutonic rocks overlain by a Cambrian-Ordovician shale-rich platformal succession (van Staal et al., 2009; Pollock et al., 2007).

The westernmost subdivision is the Humber Zone, which represents the dominantly passive Laurentian margin, consisting of Neoproterozoic Grenvillian crystalline basement overlain by several different stratigraphic groups of syn-rift to passive margin shelf facies. (Waldron et al., 1994; Allen et al., 2010).

The Dunnage zone of central Newfoundland is of most importance to the current project area. The Dunnage zone comprises vestiges of the early Paleozoic Iapetus Ocean (Williams et al., 1992; Dunning et al., 1990). It has been further subdivided into the Notre Dame subzone and the Exploits subzone. This boundary is demarcated by the Red Indian Line, a suture zone that marks the late Ordovician closure of the Iapetus Ocean (Zagorevski et al., 2010; van Staal et al., 2007). The Dunnage zone, as a whole, is characterized by Cambrian to Silurian continental and oceanic arc and back arc volcanic and ophiolitic complexes formed in the Paleozoic Iapetus Ocean (Zagorevski et al., 2007; Swinden et al., 1997).

In the Through Hill area of the Exploits subzone, the Pipestone Pond, Coy Pond, and Great Bend ophiolite complexes together comprise a tectonic window through which the Ganderian-derived Spruce Brook formation is visible (Colman-Sadd and Swinden, 1984). Colman-Sadd and Swinden (1984) proposed that the ophiolites originally constituted a single unit that was thrust upon the

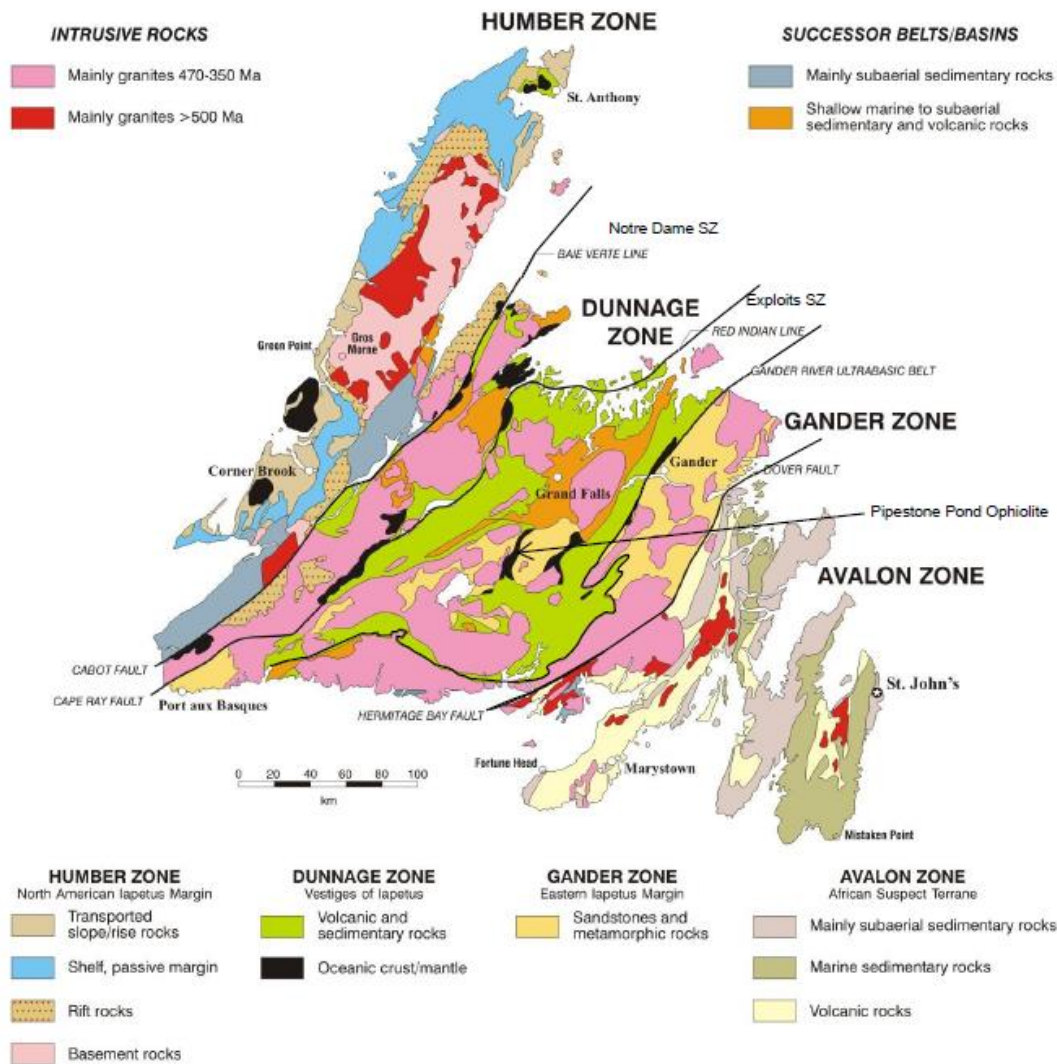


Figure 4-2 Regional Geology and Tectonic Subdivisions of Newfoundland (modified from Williams, 1988)

Gander zone, then subsequently uplifted and sufficiently eroded to produce the Mount Cormack window.

The Pipestone Pond Complex (Figure 4.3) is a west-facing, variably serpentized, ophiolite sequence comprised of harzburgite, pyroxenite, dunite, gabbro and mafic volcanic rocks (Swinden, 1988; Dunning et al., 1985). The complex is completely fault bounded, as well as internally offset, such that the entire ophiolite sequence is not visible at any one location (Swinden 1988; Jenner and Swinden, 1992). Dunning and Krogh (1985) produced a U-Pb zircon age for the Pipestone Pond Complex of 494 ± 3 Ma which they also correlated with the Coy Pond Complex.

4.2 Physical Features

4.2.1 Project Site Description

The 7.63-kilometer proposed Pipestone gravel access road extension is located between 59.5 kilometers and 66.7 kilometers, respectively, southwest of the Town of Grand Falls – Windsor, NL. The area is remote but can be accessed by travelling a distance of 74.2 kilometers northwest from the Town of St. Alban's, along NL Hydro's gravel access road leading to the Upper Salmon Hydro Project's Great Burnt Dam. After crossing the dam, the proposed road extension (south end) can be accessed via travelling north from the dam for approximately 7.6 kilometers along a pre-existing access road and then turning east onto First Atlantic's exploration trail (Exploration Permit No. E240536) for 4.4 kilometers (Figure 3.2). The proposed Pipestone access road extension will be used to mobilize the diamond drill, associated equipment and consumables to the various proposed drill sites. In addition, the proposed access road will be used to transport the drillers and field crews back and forth from the camp to the various work areas, using an ATV and truck and to transport drill core to the logging facility located at the field camp.

The Pipestone Pond Ophiolite Complex has an extensive history of exploration dating back to the late 1800s. Commodities of interest include asbestos, chromite, magnesite, copper, and gold. Nickel (awaruite) has only been a focus once before, in 2011/2012, when Altius Resources explored Newfoundland ophiolites as part of a joint venture with Cliffs Natural Resources. The area has also seen geological mapping by industry, the Geological Survey Division of the Newfoundland & Labrador Department of Energy and Mines, and Memorial University of Newfoundland and Labrador.

The Pipestone access road extension will be located on hard packed terrain where possible, avoiding soft areas with little underlying mineral soil or bedrock. The road will maintain a 30 m buffer from all previously mapped 1:50,000 wetlands, watercourses and ponds, as required by the Government of Newfoundland & Labrador, Department of Environment, Conservation and Climate Change, Water Resources Management Division. There are no scheduled salmon rivers within or adjacent to the project area.

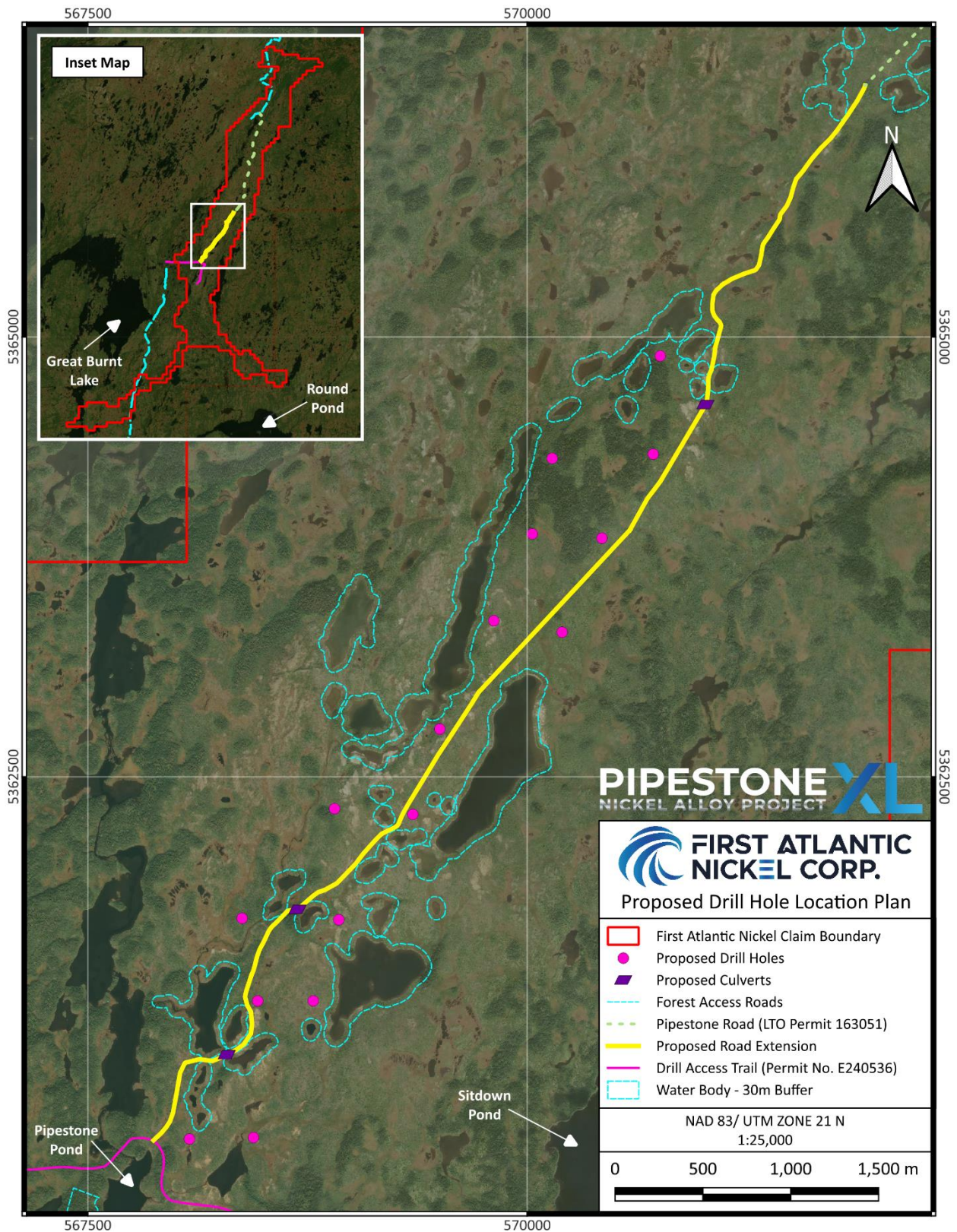


Figure 4-4 Location of proposed drill hole collars along or proximal to the proposed road extension.

The proposed Pipestone access road extension and all culvert installations will be constructed according to the Government Construction Standard Regulations for Resource Access Roads. Any wood harvested from the right of Way will be utilized in accordance with those regulations.

The primary physical feature of this undertaking is the construction of a mineral exploration road in order to provide access to the exploration target areas for mainly drilling purposes, in addition to prospecting and rock sampling, geological mapping, and ground geophysical surveys. The volume of traffic utilizing the proposed Pipestone mineral exploration access road over the next 2 years is estimated to be in the order of 6 - 10 people per day during field operations. This will include, 2 drilling crews (4 persons in total), a geologist and drilling foreman. During ground field exploration activity, it is estimated that the traffic volume will increase to 10 crew, 6 drilling and related crew previously mentioned and an additional 2 geologists and 2 prospectors.

The Pipestone access road extension will be designed to accommodate the width and weight of exploration vehicles, drills and associated equipment. The final alignment will be adjusted to avoid crossing water bodies as much as possible. First Atlantic Nickel Corp will utilize the most effective engineering practices when constructing the road and the required water crossings in order to prevent any harm to the habitat, and in compliance with all applicable laws, regulations, and engineering standards that govern the province of Newfoundland and Labrador.

First Atlantic Nickel Corp is committed to taking appropriate measures to continuously monitor for any unknown adverse effects. The construction of the proposed Pipestone access road extension will not impact the public or nearby communities. Nevertheless, prudent consideration and management from First Atlantic Nickel Corp will minimize potential adverse effects. The design of the access road extension for the Pipestone XL Nickel Project will also be engineered to consider environmental factors. Careful considerations and mitigation measures will be adopted to minimize potential impacts and protect the area's ecological integrity.

4.2.2 Existing Biophysical Environment

The proposed Pipestone access road extension is located within the *Central Barrens Subregion* of the Maritime Barrens Ecoregion (Figure 4.5). The subregion covers 15,243.9 km² and contains no coastal areas. As a result, it experiences less fog and wind than other coastal subregions, is drier, and has warmer summer temperatures. In addition, the subregion has lower winter temperatures, resulting in longer lasting and deeper snow cover.

Bogs and fens occur regularly, similar to the other three coastal subregions. However, in the Central Barrens subregion, domed bogs become more common than in the rest of the Maritime Barrens Ecoregion.

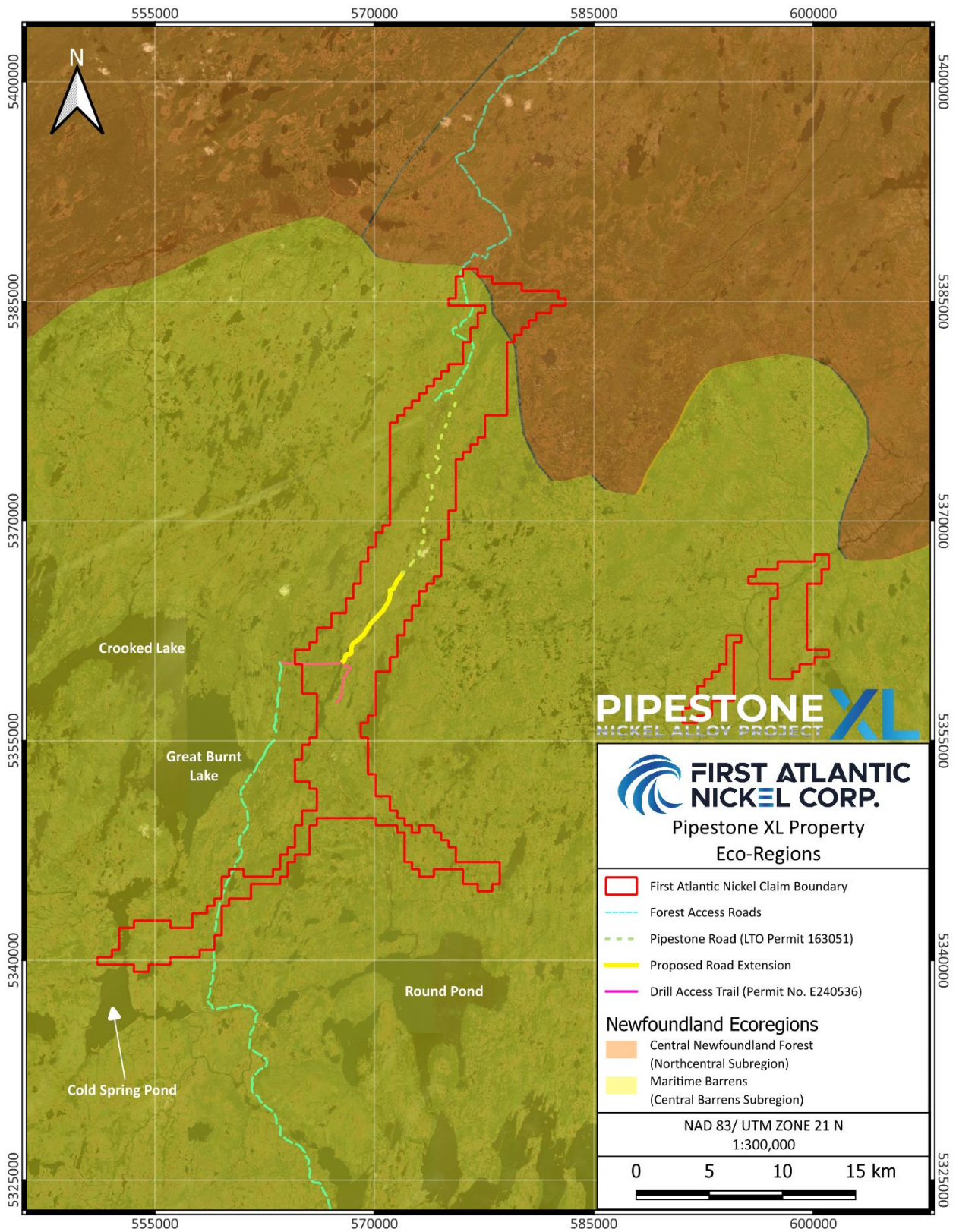


Figure 4-5 Newfoundland eco-regions for the Atlantic Nickel Property

The topography of the Central Barrens subregion dramatically reflects glacial activity that occurred more than 10,000 years ago. Most of the area is covered by gently rolling ground moraine, commonly marked by conspicuous boulders (erratic's) left by retreating glaciers, and hundreds of lakes and ponds created by glacial gouging of the earth's surface.

The proposed Pipestone access road extension is located between 320 m above sea level (ASL) at the north end of the proposed road extension to 220 m above sea level (ASL) at the south end. Relief is generally flat to low along the proposed road access route, and no major hills or valleys are present.

The proposed route for the Pipestone Access Road Extension was designed to pass through sporadic tree stands where possible; to maintain it's location on solid workable ground and to avoid wetland areas.

The Central Barrens subregion, like the rest of the Maritime Barrens ecoregion contain open barren areas where mainly dwarf shrub heaths comprising sheep laurel, low bush blueberry, and Rhodora occur. Small pockets of stunted balsam fir, or tuckamore are widespread throughout the subregion. Other plants, such as dogberry, larch, mountain holly, partridgeberry, black and pink crowberry are also common in the Central Barrens subregion. Balsam fir dominates the forests of the Central Barrens, although black spruce is also common. The forest floor generally consists of abundant mosses, broom moss, feathermoss and others. Speckled alders often grow on the edges of brooks.

The main wildlife species within the Central Barrens subregion include caribou, moose, black bear, mink, fox, lynx, squirrel, beaver, muskrat, otter, and snowshoe hare. A wide variety of birds, both year-round residents and migratory, live in the Central Barrens Subregion. Partridge, sparrow, snipe, Canada geese, merganser, black duck and loon are among some of the more common birds found in this subregion.

The subregion's many lakes and rivers support a variety of fish, the most common of which are brook trout, brown trout, rainbow smelt, American eel, three-spine and nine-spine sticklebacks. There are no scheduled Atlantic salmon rivers that cross or are in the vicinity of the proposed Pipestone access road extension.

4.3 Construction and Maintenance

The construction aspect of the proposed Pipestone access road extension project will consist of cutting any merchantable timber along the proposed (20) meter wide right of way, and piling for future recovery, once the road is constructed. Cutting of merchantable timber will be carried out by either handheld chainsaws or mechanical harvesting equipment and in accordance with all applicable forestry regulations. A commercial cutting permit will be obtained prior to commencing the cutting of the right of way. Shrubs and non-merchantable trees will be mulched. The proposed route is designed to be located on stable ground and to maintain the required buffers related to wetlands, watercourses and ponds. The work will primarily involve a standard civil construction road building method referred to as “ditch to build”. A total of three culverts are proposed, in order to control water flow, to maintain the road’s integrity, and to ensure that natural drainage of the area remains unimpacted. Applications for Permit to Alter a Body of Water – Schedule A – Culvert will be prepared and submitted to Department of Environment and Climate Change, Water Resources Management Division for the proposed three culvert locations. General maintenance will be carried out to maintain the quality of the road as it is utilized over time, which would include the use of an excavator and/or grader to fix ruts, and settled areas, etc.

4.3.1 Road Construction

Road construction will primarily be completed by an excavator using the accepted “Ditch to Build” method for resource road construction. The excavator will construct ditches along either side of the road, as required, and place the material along the roadway to build it up with solid mineral soil and rock. If material for the road construction cannot be sourced from the roadway, then it will be sourced from small areas along the road right of way, containing mineral soil and or rock and trucked to the required areas using a dump truck and excavator for loading the truck. If the sources of road building material extend beyond the road right of way, then a quarry permit will be secured from the Quarry Materials Division, Department of Energy and Mines.

Pending permit approval, the proposed start date for the construction of the Pipestone access road extension is estimated to take place during the summer of 2026, subject to the Minister of Environment and Conservation’s decision. The construction of the proposed access road extension is estimated to take approximately 8 weeks to complete. When considering the relatively flat terrain in the area and readily available in-situ granular road building material, First

Atlantic Nickel Corp believes this timeline to completion is achievable. Once construction starts, it is estimated to continue uninterrupted until its completion, subject to no technical and/or permitting related delays.

The proposed Pipestone access road extension will be constructed from the south to the north, utilizing the existing permitted drill trail (Permit No. E240536).

4.3.2 Culverts and Bridges

No bridges will be required in the construction of the proposed Pipestone access road extension. A total of three culverts will be installed, pending relevant governmental approvals. Please refer to Figure 4.4 for location of the proposed culverts. The installation of the culverts will be done under approval from the Water Resources Management Division under an Application for a Permit to Alter a Body of Water. All requirements of the permit approvals will be followed in order to prevent unnecessary disturbance to the watercourses.

4.3.3 Road Maintenance

Over time, the proposed Pipestone gravel access road extension will require upkeep and maintenance. An excavator and/or grader to smooth or fill in ruts and potholes will be utilized, as required. This may require the additional removal of material from the ditches which form the edge of the road, for the purpose of road upkeep and to maintain the integrity of the drainage ditches.

4.3.4 Alternatives to the Proposed Undertaking

Alternatives for property access were evaluated during the planning stages of the proposed undertaking. The current access route for the Pipestone XL project utilizes NL Hydro's 75-kilometer-long gravel road leading from the south coast community of St. Alban's to its Great Burnt Dam, located approximately 7 kilometers south of the Pipestone XL project area. Although this route is adequate in the short-term, it is not a long-term access solution. The primary issue is that this route crosses NL Hydro's Great Burnt Dam. As the Pipestone XL project progresses into advanced exploration and development, resultant increased heavy equipment traffic flow across the dam will not be practical or safe, nor will it likely be permitted by NL Hydro. In addition, the

current travel time for workers to get to site via this route is 4.5 hours. If the proposed undertaking is approved, worker travel time to get to site will be reduced to 1.5 to 2.0 hours.

In the planning of the proposed undertaking, other northern routes were evaluated in an effort to connect to the Town of Grand Falls - Windsor. However, it was determined that the straight-line route selected in the proposed undertaking, was the most practical and cost effective.

The use of winter roads to support First Atlantic's exploration programs on the Pipestone XL project was also considered. This would be a practical solution for winter exploration programs. However, it would not provide an adequate solution for property access throughout the remainder the year, both, in the short term or long term, as the project progresses into an advanced exploration stage.

The use of helicopter-only supported exploration programs was also briefly considered. First Atlantic Nickel Corp's 2024 exploration program was carried out primarily with helicopter-only support. However, this would not provide an adequate, cost effective, short or long-term solution to address property access. Also, when helicopters are used to transport work crews, drills and ancillary equipment to and from the various work sites, there is an inherent increase risk in worker safety. Inclement weather will also reduce the number of days that the helicopter can fly, thus reducing the number of work days in an already short field exploration season.

4.4 Potential Sources of Pollution During Construction and Maintenance

The construction and maintenance phases of the development will utilize equipment such as chainsaws, pumps, feller buncher, excavator, dump truck and a grader. This equipment and related activities represent a potential source of noise disturbance, exhaust emissions, the potential accidental release of petroleum hydrocarbons, dust, siltation of watercourses, domestic waste and general refuse.

4.4.1 Air

Air Pollution will be controlled by having all equipment on site fitted with the appropriate emission-control equipment and keeping mechanical gear in good working order. Dust is not anticipated to be a major concern as there will not be continuous use of the road when developed. Regarding the construction phase, a water spraying truck will be used to control dust emissions, if necessary. All activities within potential gravel pit sources will be conducted in a manner that respects the province's *Air pollution Control Regulations (2004)*.

4.4.2 Noise

The construction phase as well as the day-to-day general use of the road after the construction is completed is not anticipated to have an effect on the single nearby receptor identified, (Crown Land Lease Title No. 62775), as it is located 3.7 kilometers southeast of the closest point of the Pipestone Road extension project. (refer to Figure 4.1). Intermittent noise during the construction phase is not anticipated to be an issue due to the distance of the road from the cabin, the dense tree stands that lie in between, as well as the undulating topography that exists in this area.

All equipment will be kept in good operating order to ensure that maximum manufacture decibel levels produced are not exceeded. Workers will have the proper hearing protection, and the work site will be a controlled work environment following all OHS requirements.

4.4.3 Domestic Waste and Sewage

Domestic waste generated during construction will be collected and disposed of in accordance with the Environmental Protection Act 2002. If required, portable lavatories will be placed along the Pipestone access road extension during construction. Waste will be removed by an approved sewage disposal service provider.

4.4.4 Fuel

Fuel will primarily not be stored on site, but will be brought in as required by either a petroleum product service company or the road construction company, in fully approved tanks for transport. If a small fuel cache is required for the road construction, an application for the Establishment of Fuel Caches at Non-remote Sites will be submitted to Digital Government and Services Branch,

department of Digital Government and Service NL. A government issued fuel cache permit will be obtained prior to storing fuel onsite.

The handling of petroleum products on site will comply with the Storage and Handling of Gasoline and Associated Products Regulations. The mitigation plan involves utilizing double-walled and certified fuel tanks and on-site emergency response spill kits in case of any incidental hydrocarbon spills. Monitoring and reporting programs will be established to ensure compliance with regulatory requirements and to identify any issues that may arise during construction. Any leaks or spills in excess of 70 liters will be reported to the Environmental Emergency Telephone Line and cleaned up immediately.

4.4.5 Effluent

Sediment erosion and control is one of the concerns for this project. Three culverts will need to be installed along the 7.67-kilometer proposed Pipestone access road extension. There is the potential for erosion and transport of fine-grained particles during construction activities in relation to the culvert installations and general road construction/ditching. Constant monitoring of this potential will take place during construction, and appropriate mitigating measures in line with government regulations and industry best management practices will be utilized. The first step will be to create rock check dams along with hay bales and silt fencing, as required, along ditches parallel to the road to filter water before entering watercourses, ponds or wetlands.

During construction, the installation of the culverts will be completed in an environmentally responsible manner and by a reputable contracting company with many years experience carrying out this and similar work.

Culvert diameters will be sized to handle water flow, based on upstream drainage areas and maximum flow rates. Silt screen, hay bales and rock check dams will be utilized, as required, during the road construction, and as long as necessary after construction. The culvert installations will be carried out in accordance with government regulations to reduce the amount of siltation downstream during the install, and as set out in the Permit to Alter a Body of Water, which will be obtained from the Government of Newfoundland & Labrador, Department of Environment & Climate Change, Water Resources Management Division, prior to installation.

After the road is constructed, sediment control measures will remain in place and runoff

will be monitored. In some cases, runoff will be directed to vegetated areas to allow for natural filtration of the water. All water released into the environment will meet the regulatory requirements of the permits.

Liquid effluents can be generated mostly from leaks or spills from equipment or fuel storage tanks. The mitigation plan involves utilizing double-walled and certified fuel tanks and on-site emergency response spill kits in case of any accidental spills. Monitoring and reporting programs will be established to ensure compliance with regulatory requirements and identify any issues that may arise during construction.

The construction of the proposed Pipestone access road extension will be conducted by careful planning and execution, to ensure that it is built to withstand the region's environmental conditions and to meet regulatory requirements, while minimizing the impact on the surrounding ecosystem. Throughout the construction process, various quality control measures will be employed to ensure that the road is built to the required specifications, is safe for use, and is environmentally sustainable. These measures include regular inspections, and adherence to applicable regulatory standards.

4.5 Potential Resource Conflicts During Construction and Maintenance

Potential resource conflicts during construction, maintenance and use of the road could include encounters with wildlife, and the public use of the area for recreational purposes such as big and small game hunting and berry picking activities.

Any encounter with wildlife shall follow regulations stated in the Wildlife Regulations under the *Wildlife Act (CC. 96-809)*. All regulations governing the protection and preservation of wildlife species will be respected and strictly adhered to. The effect on recreational berry picking activities is anticipated to be very low, given the long distance one would have to travel to get to this area. The proposed Pipestone Access Road Extension Project is located within moose management Area 20 – Round Pond, covering 2783 km².

The proposed 7.67-kilometer Pipestone access road extension is located on crown land and within First Atlantic Nickel Corp's mineral licenses. There are no protected road zones, buried

fiber optic cables or any overhead NL Hydro transmission lines along the proposed Pipestone access road extension right of way. The access road will maintain a 30 m buffer from all mapped 1:50,000 watercourses, ponds and wetlands, as required by the Water Resources Management Division.

The Company is committed to responsible exploration, environmental stewardship, and working closely with government regulatory agencies to ensure the protection and preservation of wildlife in the region and their habitat.

With regard to cumulative effects assessment on First Atlantic's Pipestone XL property, the area has no visible or hidden infrastructure, as previously mentioned and no other companies are conducting operations of any type on the property. As First Atlantic Nickel Corp continues its mineral exploration activity on the property, it will closely monitor and appropriately address any cumulative effects that may occur.

4.6 Occupation

The occupations required for the proposed Pipestone Access Road Extension Project are listed below and classified as per the National Occupational Classification (2016):

Construction

- 1 Construction Supervisor (7302)
- 4 Heavy Equipment Operators – Excavator/ Dozer/ Dump Truck/ Feller Buncher (7521)

Maintenance

- 2 Heavy Equipment Operators – Excavator/Grader (7521)

Construction of the access road will require up to 5 employees while intermittent ongoing maintenance will require up to 2 employees periodically.

The construction crews will be accommodated at First Atlantic Nickel Corp's proposed field exploration camp, and/ or commute daily to Bay d' Espoir.

4.7 Reclamation and Closure

The proposed Pipestone gravel access road extension will be used over the next several years by First Atlantic Nickel Corp to carry out its mineral exploration activity on its mineral licences. Should the project enter into an advanced exploration and development phase, the road will still be utilized and maintained. Should First Atlantic Nickel cease operations in the area, and no longer require use of the road, a reclamation and closure plan will be implemented in accordance with all government requirements and specifications. The reclamation and closure plan will include but not necessarily be limited to the following:

- 1) All culverts will be removed in accordance with all environmental regulations and guidelines.
- 2) The side ditches of the road will be re-established to undisturbed contours and revegetated with natural vegetation.
- 3) The road within the 30 meter no grub zone of any brook shown on a 1:50,000 scale topographic map will be revegetated and/or lined with hay in order to prevent erosion and silt particles from entering the brook.
- 4) Barricades comprising of coarse rip rap will be placed on both sides of the brooks where culverts have been removed and set back a safe distance for public safety reasons and as per government regulations and specifications.

5.0 APPROVAL OF THE UNDERTAKING

Approval for the construction of the proposed Pipestone Access Road Extension Project will be obtained from the Government of Newfoundland & Labrador, Department of Environment & Climate Change prior to the commencement of any aspect of its construction. Any questions or concerns from the various referral agencies engaged in the permitting process, will be responded to accordingly and in a timely manner.

Table 5-1 contains a list of referral agencies required for the project, some of which are already in progress. A Licence to Occupy application was submitted to Crown Lands on December 15, 2025, and was assigned application number **164977**.

Table 5-1 List of referral agencies, responses and possible permits required.

Department/ Regulatory Agency	Status	Possible Required Approvals/ Permits
Department of Forestry, Agriculture and Lands	Being Reviewed	Commercial Cutting Permit
Department of Environment, Conservation and Climate Change	Project Registration Required	Environmental Assessment Registration
Department of Energy and Mines	Being Reviewed	
Department of Government Services	Being Reviewed	
TCAR – Tourism, Culture, Arts and Recreation	Being Reviewed	
TI – Transportation and Infrastructure	Being Reviewed	
FFA - Crown Lands Division (Central)	Being Reviewed	License To Operate Permit (LTO)

6.0 SCHEDULE

The proposed schedule for this project is as follows:

Submission of Registration Document	April 2026
Review of Submission Document by Government	May 2026
Commencement of Construction and Operations	July 16 2026

7.0 FUNDING

Funding for the construction of the proposed Pipestone Access Road Extension will be provided entirely by the proponent. The approximate capital cost of the project has been estimated at \$ 500,000, after consultation with a local reputable contractor having substantial experience in constructing similar access roads.

8.0 CONCLUSION

Awaruite, a naturally occurring nickel-iron alloy composed of Ni_3Fe , is an environmentally safer solution to North America's domestic critical nickel supply shortage. Unlike conventional nickel sources, awaruite can be processed into high-grade concentrates exceeding 60% nickel content without the need for smelting. This is particularly significant given the lack of smelting capacity in North America, and the Inflation Reduction Act's requirement that critical minerals in batteries be extracted or processed domestically or in countries with U.S. free trade agreements by 2025.

The U.S. Geological Survey (USGS) highlighted awaruite's potential, stating, "The development of awaruite deposits in other parts of Canada may help alleviate any prolonged shortage of nickel concentrate. Awaruite, a natural iron-nickel alloy, is much easier to concentrate than pentlandite, the principal sulfide of nickel." Awaruite's unique properties enable cleaner and safer processing compared to conventional sulfide & laterite nickel sources, which often involve smelting or high-pressure acid leaching. These methods can release toxic sulfur dioxide, generate hazardous waste, and could cause acid-mine drainage. Awaruite's simpler processing eliminates smelting and intensive acid leaching, reducing greenhouse gas emissions and toxic chemical release risks, addressing concerns about the large carbon footprint and toxic emissions associated with battery metal refining, particularly for nickel.

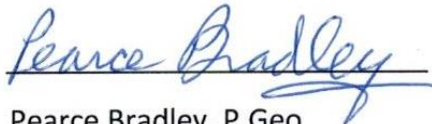
The development of awaruite resources is crucial, given China's dominance in the global nickel market. Chinese companies refine and smelt approximately 68%-80% of the world's nickel. Through investments, they also control an estimated 84% of Indonesia's nickel output, the world's largest nickel supplier. Awaruite presents an environmentally safer, more sustainable, and domestically processable nickel source that can meet the growing demand in the stainless steel and electric vehicle markets, while reducing reliance on China-dominated foreign refining and smelting.

First Atlantic Nickel Corp is a Canadian mineral exploration company that owns 100% of the Atlantic Nickel Project, a large-scale significant nickel awaruite project in Newfoundland and Labrador. The project's combination of size, location, proximity to infrastructure, and the presence of awaruite make it unique. By eliminating the need for smelting, nickel in the form of awaruite reduces dependence on foreign entities of concern for both supply and processing, thereby

strengthening supply chain security. In 2022, the US Government designated nickel as a critical mineral, highlighting its importance to the nation's economy and security.

By developing this domestic awaruite nickel project, First Atlantic Nickel Corp aims to enhance supply chain security for the stainless steel and electric vehicle industries in the USA, Canada, and Europe. The Company's strategic location and focus on awaruite nickel position it to play a key role in meeting the growing demand for responsibly sourced nickel in these sectors.

The Company is committed to responsible exploration, environmental stewardship, and working closely with government regulatory agencies and local communities to create sustainable economic opportunities. With its experienced team and the project's significant potential, the Company is well-positioned to contribute to the future of the nickel industry and the global transition to a cleaner, more secure energy future, while boosting Newfoundland and Labrador's economy and putting the province front and center in striving toward a green energy future.

A handwritten signature in blue ink that reads "Pearce Bradley". The signature is written in a cursive style and is positioned above a horizontal line.

Pearce Bradley, P. Geo
Exploration Geologist
First Atlantic Nickel Corp.

Date: April 25, 2026

9.0 REFERENCES

- Colman-Sadd, S., Swinden, H. (1984). A Tectonic Window in Central Newfoundland? Geological Evidence That the Appalachian Dunnage Zone May Be Allochthonous. *Canadian Journal of Earth Sciences*, 21, 12, pp. 1349-1367.
- Dunning, G, & Krogh, T. (1985). Geochronology of Ophiolites of the Newfoundland Appalachians. *Canadian Journal of Earth Sciences*, 22, 11, pp. 1659-1670.
- Dunning, G, O'Brien, S, Colman-Sadd, S, Blackwood, R, Dickson, W, O'Neill, P, & Krogh, T. (1990). Silurian Orogeny in the Newfoundland Appalachians, *Journal of Geology*, 98, 6, pp. 895-913.
- Jenner, G., Swinden, H. (1992). The Pipestone Pond Complex, Central Newfoundland; Complex Magmatism in an Eastern Dunnage Zone Ophiolite. *Canadian Journal of Earth Sciences*, 30, 3, pp. 434-448.
- Pollock, J, Wilton, D, van Staal, C, Morrissey, K. (2007). U-Pb Detrital Zircon Geochronological Constraints on the Early Silurian Collision of Ganderia and Laurentia Along the Dog Bay Line; The Terminal Iapetus Suture in the Newfoundland Appalachians. *American Journal of Science*, Vol. 307-2, pages 399-433
- Swinden, H.S. (1988). Geology and Economic Potential of the Pipestone Pond Area (12A/1 NE; 12A/8 E), Central Newfoundland. *Geological Survey Branch – Department of Mines, Government of Newfoundland and Labrador*. Report 88-2.
- Swinden, H.S., Jenner, G.A., Syzbinski, Z.A. (1997). Magmatic and Tectonic Evolution of the Cambrian-Ordovician Laurentian Margin of Iapetus: Geochemical and isotopic Constraints from the Notre Dame Subzone, Newfoundland. *Geological Society of America Memoirs*. Vol. 191, pages 337-365.
- Williams, H, Colman-Sadd, S, & Swinden, H. (1988). Tectonic-stratigraphic Subdivisions of Central Newfoundland, *Geological Survey of Canada*, Paper 88-1B, pp. 91-98.
- Williams, H.S., Boyce, W., Colman-Sadd, S. (1992). A New Lower Ordovician (Arenig) Faunule from the Coy Pond Complex, Central Newfoundland, and a Refined Understanding of the Closure of the Iapetus Ocean. *Canadian Journal of Earth Sciences*, Vol. 29, pages 2046-2057.
- Wilton, D.H.C., Thompson, G.M., Grant, D.C. (2017). The Use of Automated Indicator Mineral Analysis in the Search for Mineralization – A Next Generation Drift Prospecting Tool. *Explore*. Vol 174.
- van Staal, C., Whalen, J., McNicoll, V., Pehrsson, S., Lissenberg, C., Zagorevski, A., van Breemen, O., Jenner, G.A. (2007) The Notre Dame Arc and the Taconic Orogeny in Newfoundland. *Geological Society of America Memoirs*, Vol. 200, pages 511-552.

- van Staal, C., Whalen, J., Valverde-Vaquero, P., Zagorevski, A., Rogers, N. (2009) Pre-Carboniferous, Episodic Accretion-related, Orogenesis Along the Laurentian Margin of the Northern Appalachians. *Geological Society of London, Special Publications*, Vol. 327, pages 271-316.
- Zagorevski, A., Rogers, N., van Staal, C., McClenaghan, S., Haslam, R. (2007) Tectonostratigraphic Relationships in the Buchans Area: A Composite of Ordovician and Silurian Terranes? *In Current Research. Newfoundland and Labrador Department of Industry, Energy and Technology Geological Survey*, Report 07-1, pages 103-116.
- Zagorevski, A., van Staal, C., Rogers, N., McNicoll, V., Pollock, J. (2010) Middle Cambrian to Ordovician Arc-back arc Development on the Leading Edge of Ganderia, Newfoundland Appalachians. *Geological Society of America Memoirs*, Vol. 206, pages 367-396

APPENDIX A – ATLANTIC NICKEL PROPERTY MINERAL LICENCES

Current License Holder	License #	No. of Claims	Issue Date	Anniversary Date	Work Due Date	Report Due Date	Work Required
Alexander Duffit	034367M	15	28-Apr-22	28-Apr-27	28-Apr-26	27-Jun-25	\$ 2,264.36
Stanley Squires	034637M	11	09-Jun-22	09-Jun-27	09-Jun-25	08-Aug-25	\$ 3,300.00
Stanley Squires	034913M	7	04-Aug-22	04-Aug-27	04-Aug-25	03-Oct-25	\$ 986.14
Stanley Squires	034826M	4	18-Jul-22	18-Jul-27	18-Jul-25	16-Sep-25	\$ 1,200.00
Stanley Squires	034856M	14	21-Jul-22	21-Jul-27	21-Jul-25	19-Sep-25	\$ 4,200.00
Stephen Stockley	035611M	4	02-Mar-23	02-Mar-28	02-Mar-25	01-May-25	\$ 1,386.14
Stephen Stockley	035610M	18	02-Mar-23	02-Mar-28	02-Mar-25	01-May-25	\$ 1,719.06
Stephen Stockley	035607M	82	02-Mar-23	02-Mar-28	02-Mar-26	01-May-25	\$ 24,209.16
Stephen Stockley	035616M	6	02-Mar-23	02-Mar-28	02-Mar-25	01-May-25	\$ 179.61
Darrin Hicks	031740M	2	19-Dec-20	19-Dec-25	19-Dec-25	17-Feb-25	\$ 800.00
Darrin Hicks	031739M	2	19-Dec-20	19-Dec-25	19-Dec-25	17-Feb-25	\$ 800.00
Darrin Hicks	036777M	2	22-Nov-23	22-Nov-28	22-Nov-25	21-Jan-26	\$ 500.00
Darrin Hicks	036080M	6	25-May-23	25-May-28	25-May-25	24-Jul-25	\$ 1,500.00
Darrin Hicks	031896M	6	21-Jan-21	21-Jan-26	21-Jan-25	21-Mar-25	\$ 3,864.38
1446199 BC Ltd	035249M	2	18-Nov-22	18-Nov-27	18-Nov-25	17-Jan-25	\$ 600.00
1446199 BC Ltd	035509M	91	16-Feb-23	16-Feb-28	16-Feb-25	17-Apr-25	\$ 40,950.00
1446199 BC Ltd	035511M	29	16-Feb-23	16-Feb-28	16-Feb-25	17-Apr-25	\$ 13,050.00
1446199 BC Ltd	035630M	64	04-Mar-23	04-Mar-28	04-Mar-25	05-May-25	\$ 28,800.00
1446199 BC Ltd	035631M	114	04-Mar-23	04-Mar-28	04-Mar-25	05-May-25	\$ 51,300.00
1446199 BC Ltd	036345M	78	03-Aug-23	03-Aug-28	03-Aug-24	02-Oct-24	\$ 15,600.00
1446199 BC Ltd	036346M	113	03-Aug-23	03-Aug-28	03-Aug-24	02-Oct-24	\$ 22,600.00
1446199 BC Ltd	036447M	21	05-Sep-23	05-Sep-28	05-Sep-25	01-Nov-25	\$ 5,250.00
1446199 BC Ltd	036649M	33	20-Oct-23	20-Oct-28	20-Oct-24	19-Dec-24	\$ 6,600.00
1446199 BC Ltd	036650M	53	20-Oct-23	20-Oct-28	20-Oct-24	19-Dec-24	\$ 10,600.00
1446199 BC Ltd	036651M	10	20-Oct-23	20-Oct-28	20-Oct-25	19-Dec-25	\$ 2,500.00
1446199 BC Ltd	036652M	47	20-Oct-23	20-Oct-28	20-Oct-25	19-Dec-25	\$ 11,750.00
1446199 BC Ltd	036776M	40	22-Nov-23	22-Nov-28	22-Nov-25	21-Jan-26	\$ 10,000.00
Total Claims:	874					Required Expenditures	\$ 266,508.85
Total Hectares:	21850						

APPENDIX B – EXPLORATION PERMIT NO. E240536

January 2, 2025

E240536 (AMENDMENT TO E240292)

Pearce Bradley
pbradtelus@gmail.com

Dear Mr. **Bradley**:

**Exploration Approval
(10 DDH [Ground Supported],
New and Existing Trails & Fuel Storage)
for First Atlantic Nickel on the
Atlantic Nickel Property
NTS: 12A/08
Licences: 035509M, 034637M, 035630M,
035631M, 035616M, 035511M,
035611M, 035610M, 034913M,
035607M, 036345M, 034367M,
031896M, 031739M, 036080M,
036447M, 031740M, 036346M,
036651M, 034856M, 034826M,
036777M, 036650M, 036776M,
036652M, 035249M, 036649M**

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. As per section 46 of the Mineral Regulations under the Mineral Act, Environmental Guidelines for Mineral and Quarry Materials Exploration have been approved by the Minister of Industry, Energy and Technology . The Proponent, its employees, agents and subcontractors (“Proponent”) shall comply with these guidelines (follow links) in regulating mineral and quarry materials exploration activities. These guidelines clarify and illustrate intentions and practical implementation of the Mineral Regulations and other legislation pertaining to exploration activities.

[env_guidelines_exploration.pdf \(gov.nl.ca\)](#)

These guidelines reference the Mineral Lands Division Information Resource: Erosion and Sediment Control which contains a description of practices that may be adopted by those parties involved in exploration or quarry development intending to minimize or control the effects of erosion and sedimentation.

[MLD INFO erosion sediment control.pdf \(gov.nl.ca\)](#)

3. 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.
4. 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.
5. 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.
6. 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
7. 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.
8. If exploration work is to take place on lands not vested in the Crown, as per section 12(2) of the

Mineral Act, the licensee 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/>

9. 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/>
10. 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>
11. 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-pratique-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.

12. 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

13. 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.
14. 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.
15. 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.
16. See additional conditions (attached) from Service NL regarding on-site waste and the use of gasoline and associated products.

Forestry

17. Any use of existing Forest Access Roads, must not restrict or interfere with access by other resource users and the general public.
18. If proposed work is to take place in areas that have been silviculturally treated (Plantations or Pre-Commercially Thinned Areas), the Proponent is advised to contact the local Forest Management District Office to discuss the proposed work with the goal of determining an acceptable mitigation, rehabilitation, or compensation plan that would minimize the impact on silviculture resources.
19. This Exploration referral is approved based on the condition the proponent acknowledges and agrees that the application is located in an area of commercial forest land and that forestry activities will not be restricted in any way. Forestry activities include but are not limited to forest access road construction, maintenance and decommissioning of forest access roads, timber harvesting, silviculture treatment, forest protection, forest management research and monitoring, conservation activities for the maintenance of ecosystems and other activities carried out in accordance with sustained yield forest management practices.
20. **The Motorized Snow Vehicles and All-Terrain Vehicles Regulations** must be adhered to. The Proponent shall comply with the **Forestry Act** 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>

Mineral Exploration Access Trails

21. In general, “Exploration access trail” means a temporary, low-impact route for which preparation and maintenance activities in support of using the route for exploration purposes is limited to one or more of the following:
 - a. Clearing trees.
 - b. Laying down corduroy or brush-matting to prevent disturbance of wet or soft areas.
 - c. Vehicle use to the extent that the natural ground cover is disturbed and a conspicuous path of travel established.
 - d. Minimal amounts of local in-filling (“minimal” meaning only at specific locations where it can be demonstrated that it would have been unsafe or impractical for an all-terrain vehicle to drive over the original topography).
 - e. Minimal amounts of local grubbing (“minimal” meaning only at specific locations where it can be demonstrated that it would have been unsafe or impractical for an all-terrain vehicle to drive over the vegetation).
22. Insofar as possible without greatly increasing the length of the planned route, trails shall be planned to avoid wetland areas (bogs, fens, saltwater and freshwater marshes, swamps, shallow water areas) or any other ground that may be susceptible to significant rutting.
23. Access trails located on wet or soft ground are permitted only if the route has been surfaced with corduroy or brush-matting before first pass by a motor vehicle. Where possible, trees cut to prepare exploration sites (e.g., to clear trench sites, drill sites, access trails, etc.) shall provide the materials for corduroy and brush-matting. Alternatively, materials such as plywood, planks, pallets, coreboxes, etc. (but not creosoted or chemically treated wood), may be used if these are the only options in treeless areas. Unlike natural, locally sourced corduroy and brush-matting, manufactured and imported materials must be removed before the access trails are decommissioned.
24. 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 Crown Land title for use as a road.
26. 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/>

Diamond Drilling & Use of Water Pumps

27. 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 area) 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.
28. 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.
29. 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.
30. 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 with inevitably break due to freezing and thawing.

31. 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:
<https://www.gov.nl.ca/dgsnl/department/contact/#locations>
32. 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.
33. 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:
 - a. Screens should be located in areas and depths of water with low concentrations of fish throughout the year.
 - b. Screens should be located away from natural or artificial structures that may attract fish that are migrating, spawning, or in rearing habitat.
 - c. The screen face should be oriented in the same direction as the flow.
 - d. Ensure openings in the guides and seals are less than the opening criteria to make "fish tight".
 - e. 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.
 - f. Structural support should be provided to the screen panels to prevent sagging and collapse of the screen.
 - g. 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.
 - h. Ensure regular maintenance of screens is carried out to prevent impingement of fish.
 - i. 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.
34. 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.

Water Resources

35. A **Section 48** Permit to Alter a Body of Water is required for this undertaking (bridges/culverts).
36. 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 (including fording) in or within 15m 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:

[Permit and Licence Application Forms and Fee Schedules - Environment and Climate Change \(gov.nl.ca\)](http://gov.nl.ca/Permit-and-Licence-Application-Forms-and-Fee-Schedules-Environment-and-Climate-Change)

OR:

[Number 151 \(gov.nl.ca\)](http://gov.nl.ca/Number-151)

Hydro Newfoundland and Labrador

37. Newfoundland and Labrador Hydro approves this referral with the following conditions:
38. Hydro has a dam in this area that is limited to vehicular traffic. The applicant should plan to construct an alternate access route to this claim as access across this dam for truck hauling, should it be required in the future, will not be permitted. Hydro has no issues with ATV's and trucks crossing the North Salmon Dam and the crossing for the drill rig and excavator would be by float, once in and once out of the area as identified. Any light vehicles on the dam must not cause any rutting on the crest of the dam. Any other heavy equipment crossing our structure has to have pre-approval by NL Hydro.
39. Any and all future works near our infrastructure must be proposed by your company and approved by NL Hydro before any work is completed. Any further work completed near, around or on NL Hydro's dam or infrastructure without NL Hydro's prior approval will force NL Hydro to refuse your Company's access across our structure and it will be communicated to the Mineral Lands Division of the Provincial Government.
40. Any damage to Hydro/Nalcor Transmission lines, dams or infrastructure in that area as a result of the activities that causes damage to or subsequent damage to customers resulting in Customer Damage Claims against Hydro will be the sole responsibility of the Applicant and are responsible to rectify the damage costs.
41. Appropriate care and caution must be taken when operating heavy equipment, ATV's and trucks around power lines. No permission is given to have equipment working under Hydro's Transmission or within our easement area. There must be no obstruction(s) to access of structures in the area. Applicant must maintain line clearances, zero exceptions. Observe and maintain proper minimum approach distance to Transmission Lines. There must not be any infringement or

disturbance within the transmission line Right of Way. The Right of Way must be maintained and accessible. Any hydro access trails that are used by the applicant must be returned to its original condition after use. Trails are use at own risk. Absolutely no trenching is to take place under the line or within the line Right of Way so that the foundation integrity of the structures is maintained. There must be no interference to our access to the line, to our access trails or any structures near the quarry. Absolutely no digging under the lines. The applicant is hereby notified that there is buried ground wire (counterpoise) along this ROW and digging is strictly prohibited. Absolutely no stock piling of product, equipment, materials, or other debris is permitted under our lines. This is strictly prohibited, at any time, no matter how short of time frame it may be. Absolutely no blasting operations. Boom on drilling or other equipment must be in the stored position when travelling on the Right of Way or under any power line, no exceptions. Operators of all equipment that have the capability of contacting overhead or underground power lines are required by regulations to have attended an approved Power Line Hazards safety training course. Travel under the line by heavy equipment must be pre-approved by Hydro/Nalcor personnel via an Energized Power Line Permit. Please contact the local office.

42. No blasting has been noted as a part of the referral application but it should be noted that if any blasting is planned near NL Hydro infrastructure, consultation and approval by NL Hydro is required before undertaking any work.

Crown Lands & Land Management

43. Access is not to be blocked.
44. 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. Lands does not require application for trails on non-wetland sites.
45. 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.
46. 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.
47. There may be issued Crown titles or active applications for Crown land within this area. If work is to take place within these issued title sites, permission from the land owner is required.

Approximate locations of Crown Land titles can be viewed on the Public Land Inquiry map viewer

here: [Land Use Atlas - Fisheries, Forestry and Agriculture \(gov.nl.ca\)](http://www.gov.nl.ca/ffa/lands/applications/)

48. 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/>

Provincial Archaeology Office

49. The Provincial Archaeology Office has reviewed and approved this referral. There is always the possibility that archaeological material may be discovered whether or not an assessment has been carried out. With this in mind, standard precautionary and reporting procedures apply.
50. 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

51. The area is located within identified core range/ habitat for Newfoundland caribou. Caribou on the Island are of conservation concern to the Wildlife Division. Any current or new footprint within this sensitive caribou area must be kept to a minimum and any long-term indirect effects on caribou habitat must be mitigated by avoiding any unnecessary disturbances to the habitat (e.g. maintaining large vegetated wetland buffers where possible/applicable). The proposed activities related to this permit application must not occur during the sensitive calving/ post-calving area, at a minimum April 15 to July 15 on an annual basis.

52. 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.
53. 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.
54. 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.
55. 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.
56. The **Wild Life Act** and the **Migratory Birds Convention Act** and associated regulations prohibit the disturbance or destruction of bird nests and eggs in Newfoundland and Labrador. Proponents are advised to develop and implement appropriate preventative and mitigative measures to avoid incidental take of birds, nests, and eggs. For more information on avoiding harm to avifauna, visit: <https://www.canada.ca/en/environment-climate-change/services/avoiding-harm-migratory-birds.html>
57. 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.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 January 2, 2027.

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

Regards,

A handwritten signature in blue ink, appearing to read 'Bernadine Lawlor', with a long horizontal flourish extending to the right.

Bernadine Lawlor
Exploration Approvals Geologist

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

Exploration Approval
(10 DDH [Ground Supported],
New and Existing Trails & Fuel Storage)
for First Atlantic Nickel on the
Atlantic Nickel Property
NTS: 12A/08

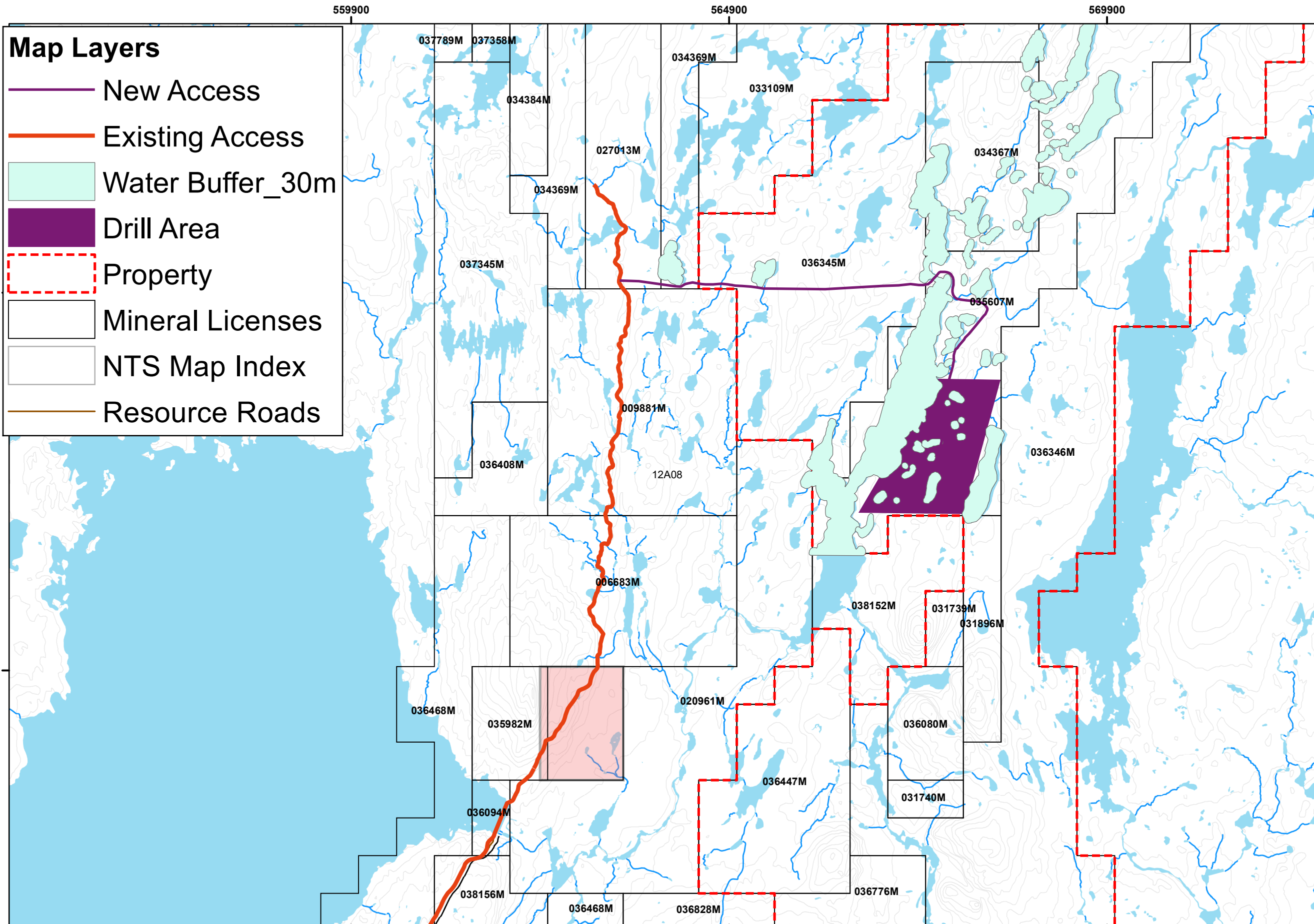
Licences: 035509M, 034637M, 035630M,
035631M, 035616M, 035511M,
035611M, 035610M, 034913M,
035607M, 036345M, 034367M,
031896M, 031739M, 036080M,
036447M, 031740M, 036346M,
036651M, 034856M, 034826M,
036777M, 036650M, 036776M,
036652M, 035249M, 036649M

Land Use Details






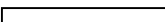


Sensitive Wildlife Area
Hydro Dam
Crown Titles
DGSNL - Grand Falls-Windsor
FMD 06, 07, 11

**E240536
(AMENDMENT TO E240292)**

N

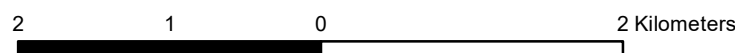


Map Layers

-  New Access
-  Existing Access
-  Water Buffer_30m
-  Drill Area
-  Property
-  Mineral Licenses
-  NTS Map Index
-  Resource Roads

GeoReference
UTM NAD 27 Zone 21

1:50,000



Project
Location

APPLICATION ACKNOWLEDGMENT
Exploration Referral

Exploration Approvals Team
Mineral Lands Division
Department of Industry, Energy and Technology
50 Elizabeth Ave.
St. John's, NL A1B 4J6
Ph: 709-729-6410

Date: December 6, 2024

RE: First Atlantic Nickel, Exploration Approval (E240536), Atlantic Nickel Property

The Government Service Centre has no objections to this proposal provided the following stipulations are adhered to:

Waste

1. All waste material shall be considered, prior to disposal, for reuse, resale or recycling.
2. All waste material generated during the construction and operation of the facility is to be placed in suitable refuse containers and removed to an approved waste disposal site on a weekly basis, with the approval of Digital Government and Service NL and the site owner/operator.
3. Any cut brush should be chopped/shredded, burnt on-site or removed to an approved waste disposal site for burning with the approval of the Forestry and Agrifoods Agency and/or the owner/operator of the waste disposal site.
4. Tires and used or waste oil is not to be used to aid in the burning of brush.

Gasoline and Associated Products

1. All fuel storage tank systems, other than those connected to a heating appliance of capacity of 2,500 litres or less, and any proposed fuel cache will require approval by Digital Government and Service NL prior to installation.
2. All fuel storage tank systems connected to a heating appliance of a capacity of 2,500 litres or less must comply with the *Heating Oil Storage Tank System Regulations*.
3. The storage, handling, and disposal of used/waste oil and used/waste glycol must be in compliance with the *Used Oil and Used Glycol Control Regulations*.
4. In order to ensure that a quick and effective response to a spill event is possible, spill response equipment should be readily available on-site. Response equipment, such as absorbents and open-ended barrels for collection of cleanup debris, should be stored in an accessible location on-site. Personnel working on the project should be knowledgeable about response procedures. The proponent should consider developing a contingency plan specific to the proposed undertaking to enable a quick and effective response to a spill event.
5. Any spill or leak of gasoline or associated product is to be reported immediately to Digital Government and Service NL by calling the Environmental Emergencies Telephone Line at 772-2083 or 1-800-563-9089.

Other

1. If at any time this operation is deemed to be creating environmental problems, corrective action will have to be taken by the owner/operator, as directed by the Government Service Centre and/or the Department of Municipal Affairs and Environment.



Paula Ford
Digital Government and Service NL

APPENDIX C – ENVIRONMENTAL REGISTRATION NO. 2326

- i Minister's Decision letter
- ii Attachment A – Conditions of Release
- iii Attachment B – Regulatory Advice

DEC 5 2024

COR-2024-4569

Reg. #2326

Pearce Bradley
Exploration Geologist
First Atlantic Nickel Corp.
P.O. Box 209
Buchan's, NL A0H 1G0
E-mail: pbradtelus@gmail.com

Dear Pearce Bradley:

RE: Atlantic Lake to Gulp Pond Exploration Access Road (the Project)

Your proposal has been reviewed by an interdepartmental environmental assessment screening committee and an opportunity to comment has been provided to the public as required by Part X of the Newfoundland and Labrador **Environmental Protection Act, SNL 2002, cE-14.2**. Please be advised that the Project is released from further environmental assessment subject to the conditions as outlined in Attachment A.

Although the Project as proposed is released from further environmental assessment, it is still subject to other legislative requirements. You must comply with all relevant legislation and obtain all necessary permits and approvals. You must inform this department of any proposed significant changes to the Project.

Please note that in accordance with Section 17 of the Environmental Assessment Regulations, the decision is valid for a period of three years from the date of this letter. If you have not commenced the Project within this three-year period, you may apply to extend the term of the decision for a maximum of three periods of one year. Should the term of the decision expire, the Project will have to be registered again for environmental assessment, if you wish to proceed. For further information, please e-mail EAProjectComments@gov.nl.ca.

If you have any questions about the environmental assessment process, please contact



Joanne Sweeney, Director of the Environmental Assessment Division, at (709) 729-0673 or via e-mail at joannesweeney@gov.nl.ca.

Sincerely,

A handwritten signature in black ink, appearing to read "Lisa Dempster".

HON. LISA DEMPSTER, MHA
District of Cartwright – L'Anse au Clair
Minister

Enclosures

Cc: Chris Tibbs, MHA – District of Grand Falls-Windsor - Buchans

Attachment A
Conditions of Release from Environmental Assessment

EA #: 2326 Atlantic Lake to Gulp Pond Exploration Access Road (the Project)

1 Definition

- 1.1 "Act" means the **Environmental Protection Act** (the **Act**).
- 1.2 "Department" means the Department of Environment and Climate Change, and the contact for the Department for this environmental assessment (EA) Release is:
- Director
Environmental Assessment Division
Department of Environment and Climate Change
P.O. Box 8700
St. John's, NL A1B 4J6
Tel. 709-729-0673
- 1.3 "Minister", unless the context indicates otherwise, means the Minister of Environment and Climate Change.
- 1.4 "Proponent" means a person who carries out or proposes to carry out a Project, or is the owner or person having charge, control or management of a Project.
- 1.5 "Registered" and "registration" mean registered under Section 49 of the **Act**.
- 1.6 "Release" means the release of a Project under Section 51, 54, 67 or 72 of the **Act** from the further application of the EA requirements of Part X of the **Act**.
- 1.7 "Undertaking" includes an enterprise, activity, **Project**, structure, work or proposal and a modification, abandonment, demolition, decommissioning, rehabilitation and an extension of them that may, in the opinion of the Minister, have a significant environmental effect.

2 Acronyms / Abbreviations

EA	Environmental Assessment
REG	Registration document
FFA	Department of Fisheries, Forestry and Agriculture
TCAR	Department of Tourism, Culture, Arts and Recreation

3 Scope

- 3.1 The EA Release letter relates to First Atlantic Nickel Corp. (the Proponent) and their Registration document (REG) for Atlantic Lake to Gulp Pond Exploration Access Road, EA REG # 2326, hereafter referred to as the "Project".
- 3.2 The Proponent shall ensure the Project is carried out in accordance with this EA Release and their REG.

4 General

- 4.1 The Proponent, First Atlantic Nickel Corp., shall uphold all commitments made in the EA submission to mitigate the effects of the Project on the environment.
- 4.2 The Proponent shall conduct the Project in accordance with the **Act**, as amended from time to time.
- 4.3 The Proponent shall provide written notification of Project commencement to the Department, prior to the commencement of Project construction, by sending an email to EAProjectComments@gov.nl.ca.
- 4.4 The Proponent shall update the EA Division on the status of the Project, including a copy of all permits, licenses, certificates, approvals and other authorizations required for the Project, within one year from the date of this EA Release letter and provide additional updates if required. Project updates shall be emailed to EAProjectComments@gov.nl.ca.
- 4.5 This EA Release does not exempt a Proponent of a Project from the requirements imposed upon the Project by (a) another Act or regulation of the province or of Canada; or (b) a municipal regulation, by-law or requirement.
- 4.6 A license, permit, approval or other document of authorization pertaining to this Project shall not be issued under another Act until the Project has been exempted or released from EA.
- 4.7 Prior to a proposed change to any aspect of the Project from that proposed in the REG, the Proponent shall submit the proposal to the Department to review for regulatory requirements, including EA registration.
- 4.8 No authority is granted by this EA Release to enable the Proponent to commence or continue the Project on lands which are not in the control or ownership of the Proponent. It is the responsibility of the Proponent to ensure that such a contravention does not occur.
- 4.9 The Proponent shall notify the Minister before a transfer, sale or lease of the Project.
- 4.10 Where a timeline is associated with a condition(s) of the EA Release, the Proponent shall fulfil the requirements of the condition(s) within the prescribed timeline, unless otherwise authorized in writing by the Minister.
- 4.11 If there is a discrepancy between the REG and the conditions of this EA Release, the conditions of this EA Release shall apply.
- 4.12 The Proponent shall bear all expenses incurred in carrying out the environmental management and monitoring required under the conditions of this EA Release, the **Act** or the EA Regulations.
- 4.13 The Proponent shall ensure that this EA Release, or a copy, is present at the Project site while personnel are on site and that personnel directly involved in the Project are made fully aware of the conditions that pertain to this EA Release.

- 4.14 Throughout the life of the Project, the Proponent shall conduct any additional studies or monitoring and/or implement additional mitigation measures as required by the Minister.
- 4.15 The Proponent shall advise the EA Division by email of when the requirements of conditions of Release have been completed, by providing a written description, documents, and images (where applicable) to demonstrate the completion of requirements. Information shall be emailed to EAProjectComments@gov.nl.ca. The Minister will advise the Proponent in writing of whether the condition(s) of Release have been met.

5 Habitat, Flora and Fauna

- 5.1 The Proponent shall ensure that road construction, road maintenance, and subsequent exploration-related activities do not occur during the sensitive calving and post-calving period for caribou, from April 15 to July 15.
- 5.2 The Proponent shall submit a Road Decommissioning Plan to the Department of Fisheries, Forestry and Agriculture (FFA) and to the Department of Tourism, Culture, Arts and Recreation (TCAR) for the approval of each department prior to the expiration of the Mineral Exploration Permit issued by the Department of Industry, Energy and Technology. The Road Decommissioning Plan shall describe actions that would be undertaken to decommission and replant the disturbed area for the road if drilling does not confirm further exploration. For more information, please contact the Wildlife Division of FFA at (709) 637-2025 and the Tourism Product Development Division of TCAR at (709) 729-4518.
- 5.3 A minimum 30-metre undisturbed buffer shall be maintained from the high-water mark of all wetlands and waterbodies that are identified on 1:50,000 National Topographic System maps, or the topographic mapping layer shown in the Provincial Land Use atlas.
- 5.4 The Proponent shall not clear vegetation within 800 metres of a bald eagle or osprey nest during nesting season (March 15 to July 31) and within 200 metres during the remainder of the year. A 200-metre buffer also applies to all other active raptor nests (e.g. Northern Goshawk, Sharp-shinned Hawk, Merlin, American Kestrel, Great-horned Owl, Boreal Owl, Northern Saw-whet Owl) during nesting season. For more information, please contact the Wildlife Division of FFA at (709) 637-2025.

6 Natural Areas

- 6.1 The Proponent shall restrict all activities to the existing road and trail networks while traveling through the Stony Lake Proposed Reserve.

7 Tourism Product Development

7.1 The Proponent shall submit an Outfitter Consultation Plan to TCAR for approval prior to the commencement of Project construction. For more information, please contact Tourism Product Development at (709) 729-4518.



HON. LISA DEMPSTER, MHA
District of Cartwright - L'Anse au Clair
Minister

Date: Dec 5/24

Attachment B
Regulatory Advice from Government Screening Departments/Divisions

EA #: 2326 Atlantic Lake to Gulp Pond Exploration Access Road (the Project)

1 Climate Change Branch (CCB), Department of Environment and Climate Change (ECC)

- 1.1 Proponent is advised to consider climate change projections for extreme precipitation events that may increase when implementing sediment erosion and control measures so they will remain in place and runoff can be monitored after the road is constructed.
- 1.2 Proponent is advised that all heavy-duty equipment used in the construction and operating phase of this Project should be operated in a manner to maximize fuel efficiency, thereby reducing greenhouse gas emissions that could contribute to climate change. For further information, please contact CCB at (709) 729-1485.

2 Pollution Prevention Division (PPD), ECC

- 2.1 Proponent is advised to ensure that waste (including organic wastes) is disposed of at a waste disposal facility, or facilities approved to accept the type and projected quantity of waste.
- 2.2 Proponent is advised that all fuel storage tank systems, other than those connected to a heating appliance of 2,500 litres or less, require registration prior to installation.
- 2.3 Proponent is advised to have a Contingency Plan that includes having spill response equipment readily available on-site to enable a quick and effective response to a spill event. Any spill or leak of gasoline or associated product is to be reported immediately to the Environmental Emergencies Telephone line at 1-800-563-9089. For further information please contact the PPD at (709) 729-5782.

3 Water Resources Management Division (WRMD), ECC

- 3.1 Proponent is advised to obtain Section 48 permits for any work that will be in or within 15 metres of a body of water.
- 3.2 Proponent is advised to obtain a water use licence under the **Water Resources Act, 2002**.
- 3.3 Proponent is advised that any effluent or runoff leaving the site will be required to conform to the requirements of the Environmental Control Water and Sewage Regulations, 2003. For further information, please contact the WRDM at (709) 729-2563.

4 Government Service Centre (GSC), Department of Digital Government and Service NL (DGSNL)

- 4.1 Proponent is advised ensure that all waste material generated during the construction and operation of the facility is to be placed in suitable refuse containers

and removed to an approved waste disposal site on a weekly basis, with the approval of the site owner/operator.

- 4.2 Proponent is advised to always keep the site neat and tidy.
- 4.3 Proponent is advised that brush should be chopped/shredded and may be burnt on-site with the approval of the Department of Fisheries, Forestry and Agriculture, or may be removed to an approved waste disposal site for proper disposal with the permission of the owner/operator of the waste disposal site. Tires and used or waste oil are not to be used to aid in the burning of brush.
- 4.4 Proponent is advised that any proposed fuel cache will require approval of DGSNL prior to installation. For further information, please contact the DGSNL at (709) 729-0248.

5 Occupational Health and Safety (OHS), DGSNL

- 5.1 Proponent must ensure all activities are conducted with compliance with the **Occupational Health and Safety Act (OHS Act)** and Regulations. This includes the responsibility for ensuring that contractors hired to perform work also comply with this legislation, as per **OHS Act** section 10. For further information, please contact OHS a 1 (800) 563-5471.

6 Department of Fisheries, Forestry and Agriculture (FFA)

- 6.1 Proponent is advised that any activities that occur within the 15m Shoreline Reserve of any water body must strictly adhere to the regulations in Section 7 of the **Lands Act**.
- 6.2 Proponent is advised that a Cutting Permit is required under the Forest Fire Regulations prior to any harvesting or timber removal in the area.
- 6.3 Proponent is advised that an Operating Permit is required under the Forest Fire Regulations prior to the start of any work during the forest fire season and can be obtained from the local Forest Management District Office.
- 6.4 Proponent is advised that a Permit to Burn is required under the Forest Fire Regulations to ignite a fire on or within 300 meters of forest land.
- 6.5 Proponent is advised to contact the local Forest Management District Office for any work proposed in areas that had silvicultural treatment (plantations or pre-commercially thinned areas) to discuss an acceptable mitigation/rehabilitation plan that would minimize the impact on silviculture resources.
- 6.6 Proponent is advised that the application is located in an area of commercial forest land and that forestry activities are not to be restricted by the Project. Forestry activities include, but are not limited to, forest access road construction, maintenance and decommissioning of forest access roads, timber harvesting, silviculture treatment, forest protection, forest management research and monitoring, conservation activities for the maintenance of ecosystems and other activities carried out in accordance with sustained yield forest management practices. For further information, please contact the FFA at (709) 637-2950.

- 6.7 Proponent is advised that the area is located within identified core habitat for Newfoundland caribou. Caribou on the Island are of conservation concern to the Wildlife Division. Any current or new footprint within this sensitive caribou area must be kept to a minimum. All unnecessary disturbance of the habitat must be avoided. The proponent must maintain large, vegetated wetland buffers where possible since these areas provide important caribou habitat.
- 6.8 Proponent is advised that a Crown Land License is required prior to any development activities.
- 6.9 Proponent is advised that there may be private land in the area not on record with the Crown Lands Office and that permission is required from the landowners prior to conducting any work planned on private lands.

7 Department of Industry, Energy and Technology (IET)

- 7.1 Proponent is advised that any quarry materials that may be required for the Project must be sourced from an approved site.
- 7.2 The proponent is advised that the Project is located in the service area of NL Hydro and to consult with NL Hydro to ensure no issues with existing or planned electrical infrastructure. For further information, please contact IET at (709) 729-

8 Environment and Climate Change Canada (ECCC)

- 8.1 Proponent is advised to avoid nest destruction and to accommodate the breeding season of migratory birds by considering nesting locations between mid-April and Mid-August in this region for when and where operations occur. ECCC requests that species-at-risk sighting be reported to the Canadian Wildlife Service (CWS) at <http://www.accdc.com/en/contribute.html>. For further information, please contact ECCC at (709) 772-4313.

9 Fisheries and Oceans Canada (DFO)

- 9.1 Proponent is advised that the modernized **Fisheries Act** includes fish and fish habitat protection provisions which came into effect on August 28, 2019. Proponent should refer to the Projects Near Water website for information about how to comply with the **Fisheries Act** as well as information on the project review process when conduction work in or near water. The 'Projects New Water' website is located at <http://www.dfo-mpo.gc.ca/pnw-ppe/index-eng.html>. For further information, please contact the Fisheries Protection Program at (709) 772-4140.

10 Transport Canada (TC)

- 10.1 Proponent is advised that the proposed Project watercourse crossings (including road work, bridges, and culverts etc.) appear to involve navigable waters not listed on the schedule and may require *Canadian Navigable Waters Act* approval(s). For further information, please contact TC at (506) 851-3113.