

July 2, 2023

Neil Bailey, Director  
BC Environmental Management Act  
Authorizations - North Region

**Subject: Blackwater | Aquatic Effects Monitoring Program (AEMP) Plan, Version 1.0**

Dear Mr. Bailey,

Pursuant to Permit 110652 issued under the *Environmental Management Act* (EMA) for the Blackwater Gold Project, please find attached the Aquatic Effects Monitoring Program (AEMP) Plan, Version 1.0 for submission. BW Gold Ltd. (BW Gold) previously submitted the AEMP Plan to the BC Environmental Assessment Office (EAO) in December 2021 and received a letter from EAO approving the AEMP February 18, 2022. The plan was also submitted to the Ministry of Environment and Climate Change Strategy (BC ENV) on December 20, 2021.

As required under Condition 4.6.1 of Permit 110652,

*The permittee must cause a Qualified Professional to develop an Aquatic Effects Monitoring Program (AEMP) and the permittee must submit an AEMP Plan for approval to the director within 60 days after the issuance of this authorization.*

A Qualified Professional has updated the AEMP Plan (see Section 7) to meet Condition 4.6.1 and the requirements of Condition 4.6.3 and BW Gold is submitting the AEMP Plan, Version 1.0 to BC ENV for approval. The updated AEMP Plan has been developed in consultation with Indigenous groups listed in Permit 110652 Condition 4.6.2 and BW Gold has given full and impartial consideration to feedback received during the process of developing the updated AEMP Plan.

During the preparation of this AEMP Plan, BW Gold engaged with Lhoosk'uz Dené Nation (LDN) and Ulkatcho First Nation (UFN) as part of the regular Blackwater Environmental Monitoring Board meetings throughout 2021 to discuss the proposed sampling plans for the AEMP. Several comments relevant to the AEMP Plan related to sampling frequency (annually versus every three years), sampling locations (lakes versus streams), and type of sampling (adult versus juvenile fish). As a result of the input and feedback received from the UFN and LDN, the proposed sampling plan was revised to include:

- Sampling frequency is proposed to be set to annually, initially (rather than every three years), with a framework to decrease sampling frequency if effects were not identified and a minimum sampling frequency of once every three years.
- Sampling of fish tissue from adult fish (Kokanee [*Oncorhynchus nerka*], Rainbow Trout [*Oncorhynchus mykiss*], and Mountain Whitefish [*Prosopium williamsoni*]) from Tatelkuz Lake and Kuyakuz Lake (control site) were added to the sampling plan, rather than focusing only on Rainbow Trout in the stream sites closest to the mine site. Sampling of fish tissue from locations where there is Kokanee spawning habitat (e.g., lower Davidson Creek, Chedakuz Creek) is not recommended to ensure that this important fish habitat is not altered or damaged by methods requiring in-creek sampling.

The AEMP Plan for fish tissue sampling was also updated in response to UFN and LDN comments during a July 29, 2021 meeting to a frequency of once every three years.

Indigenous nations also provided comments on the Draft Information Requirements Table for the Joint Mines Act/Environmental Management Act Joint Application (Joint MA/EMA Application) issued by EMLI and the Initial Project Description. Comments specific to the AEMP Plan were provided by the Carrier Sekani First Nations (CSFNs), UFN, and LDN on April 16, 2021. Draft responses were provided by BW Gold in late July 2021 and BW Gold met with groups on August 19, 2021, to discuss comments.

Three meetings with Indigenous nations in attendance to discuss the Joint MA/EMA Application review comments on the AEMP Plan were held on September 15, 2022, December 7, 2022, and March 16, 2023.

In addition, to inform the BC ENV's review of the consultation obligations BW Gold has provided a table of comments from Indigenous nations (see Appendix D and Appendix F of the AEMP Plan) on the earlier version of the AEMP Plan and how the responses/commitments have been incorporated into the AEMP Plan, Version 1.0.

We trust this satisfies your current requirements at this time. Should you have any questions or require clarification, please do not hesitate to reach out.

Yours sincerely,



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Sarah Harrison  
Manager, Environment



# Blackwater Mine

June 29, 2023

Neil Bailey, Director  
BC Environmental Management Act  
Authorizations - North Region  
Subject: Blackwater | Air Quality and Fugitive Dust Management Plan

Dear Mr. Bailey,

Pursuant to Permit 110650 issued under the Environmental Management Act (EMA) for the Blackwater Gold Project (Project), please find attached the updated Air Quality and Fugitive Dust Management Plan (AQFDMP) for submission. BW Gold Ltd. (BW Gold) previously submitted the AQFMP including a previous version of the Trigger Action Response Plan (TRP) to the BC Ministry of Environment and Climate Change Strategy (BC ENV) on April 12, 2022.

As required under Condition 4.1.1 of Permit 11650,

*The permittee must cause a Qualified Professional to prepare an Air Quality and Fugitive Dust Management Plan (AQDFMP) for the Blackwater Gold Mine Site, and the permittee must submit the AQFDMP to the director within 60 days of issuance of the permit.*

BW Gold has updated the AQDMP based on Indigenous Nation and regulatory agency review comments as well as the requirements prescribed in EMA Permit #110650 to ensure that it fully meets the requirements of Condition 4.1.3 and 4.1.4 and is submitting it to the BC ENV for approval. The updated AQFDMP has been developed in consultation with Indigenous groups and government agencies listed in Condition 4.1.2 and BW Gold has given full and impartial consideration to feedback received during the process of developing the updated AQFDMP. Most recently, BW Gold presented on the 2022 implementation of the AQFDMP to the Environmental Life-of-Mine Committee (ELoMC) on June 16, 2022. To help inform the BC ENV's review of the consultation obligations, BW Gold is including a summary of our consultation related to the AQFDMP as Attachment A.

We trust this satisfies your current requirements at this time. Should you have any questions or require clarification, please do not hesitate to reach out.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'T. Desormeaux', with a long horizontal flourish extending to the right.

Travis Desormeaux  
Manager, Permitting and Environmental Responsibility

**ATTACHMENT A AIRQUALITY AND FUGITIVE DUST MANAGEMENT PLAN -  
COMMENT RESPONSE TABLE**

| Comment ID                                      | Section                                       | Topic            | Comment Author                      | Date Comment Received               | Review Phase            | New or Follow Up to Previous Comment? | Comment Type   | Potential Permit Condition? | Comment   | Proponent Response   |
|---|---|------------------|-------------------------------------|-------------------------------------|-------------------------|---------------------------------------|--|-----------------------------|---|--|
| Unique identifying ID to keep track of comments | Section of application or supporting document | Theme of comment | Reviewer's name and/or organization | Date comment provided from reviewer | Round of review (1,2,3) | New/Follow Up                         | Information requirement, clarification, question, or comment | Yes/No                      | Reviewer's comment  | Proponent's response   |
| 6   | Appendix 9-O TBD                              | Air              | BC ENV (Tarek Ayache)               | Jun 01, 2022                        | 1                       | New                                   |  |                             | I recommend noting extra dust control measures and performance monitoring on the FSR and MAR sections near Tatakuz Lake 28 / Resort.  | The AQDMP will be updated to include specific mention of dust control and visual monitoring near Tatakuz Lake 28/Resort.<br><br>BW Gold recognizes that management plans may need various updates as a result of permitting reviews. BW Gold will track all edits and discuss with EMLI and other regulators the appropriate timing to submit updated plans. As appropriate, updated plans will also be filed with other relevant regulators and Indigenous groups.  |
| 7   | Appendix 9-O page 8-1 Table 8.2-1             | Air              | BC ENV (Tarek Ayache)               | Jun 01, 2022                        | 1                       | New                                   |  |                             | Under 'Production blasting', 'check weather conditions' and 'until weather conditions improve'; please include additional details in the document to briefly define the parameters of such weather conditions.<br>Under 'Low Grade Ore Stockpile'; please provide reference/justification for the definition of hot and dry day (also in Appendix D, Section 4)   | AQDMP will be updated to :<br>Where dust or fume impacts on employees and environment cannot be avoided, blasting must be postponed until wind direction does not disperse emissions towards employees or local sensitive receptors. The Mine Drift and Blast Superintendent and Mine manager will ultimately decide when to postpone blasting (the EM and Health and Safety can inform this decision).<br><br>The definition of "hot dry weather" is based on professional judgement.<br><br>BW Gold recognizes that management plans may need various updates as a result of permitting reviews. BW Gold will track all edits and discuss with EMLI and other regulators the appropriate timing to submit updated plans. As appropriate, updated plans will also be filed with other relevant regulators and Indigenous groups.  |
| 8   | Appendix 9-O section 8.3                      | Air              | BC ENV (Tarek Ayache)               | Jun 01, 2022                        | 1                       | New                                   |  |                             | 1st paragraph: whereas it is stated that 'air quality monitoring program will be initiated prior to the start of construction', no timeline is specified. To the extent possible, it is highly recommended that such monitoring program be initiated at least 1 year prior to construction to obtain adequate baseline data.  | AQ monitoring will begin in fall 2022 with a Thermo Scientific Partisol unit being used to capture PM2.5 and PM10. BW Gold will also be using a radiello device to collect passive NO2 and SO2 AQ samples. The filters are deployed for 30 days and then sent to an accredited lab for analysis.<br><br>As part of the Country Foods Monitoring Program, dustfall containers will also be installed at various locations in 2022 to collect additional baseline information.<br>There is no plan to add in AQ monitoring at Tatakuz Lake, the Figure (8.3-1) will be updated to represent this on future versions of the AQDMP.  |
| 9   | Appendix 9-O sections 8.3.3 and 8.3.4         | Air              | BC ENV (Tarek Ayache)               | Jun 01, 2022                        | 1                       | New                                   |  |                             | Whereas two air quality monitoring sites are identified in Figure 8.3-1, references are made only to the camp site(s) (exploration and operations). Please revise to include the other monitoring site near Tatakuz Lake 28 / Resort.   |  |
| 9   | Appendix 9-O sections 8.3.3 and 8.3.4         | Air              | BC ENV (Tarek Ayache)               | Jul 22, 2022                        | 2                       | Follow Up                             |  |                             | Given the relatively small concentrations predicted by modelling at that site, I understand this feedback.<br>That being said, in addition to the extra dust control and monitoring measures noted in comment #6, I believe that the management plans need to emphasize absolute readiness to deploy additional AQ monitoring to Tatakuz Lake 28 / Resort, in the event there are any indications of dust impacts at that site due to mining activities   | A dustfall station has been set up this summer at Tatakuz Lake that will provide data on dustfall and metals. This location will be added to Fig 8.3-1. If air quality monitoring at other locations indicates that additional monitoring at Tatakuz Lake is required BW Gold will respond quickly by deploying appropriate instrumentation in accordance with the Air Quality and Dust Management Plan.   |
| 10  | Appendix 9-O section 8.3.3                    | Air              | BC ENV (Tarek Ayache)               | Jun 01, 2022                        | 1                       | New                                   |  |                             | Please provide justification for the change in PM2.5/PM10 alternation schedule, from every other 3rd day May-Oct to weekly Nov-April  | During Nov - Apr, due to snow cover, it is anticipated that fugitive emissions will decrease significantly and therefore a less frequent sampling schedule will be sufficient to characterize PM concentrations onsite.  |
| 10  | Appendix 9-O section 8.3.3                    | Air              | BC ENV (Tarek Ayache)               | Jul 22, 2022                        | 2                       | Follow Up                             |  |                             | Whereas I understand and agree with this justification, Nov-Apr sampling frequency needs to be every 1 in 6 days to ensure adequate representation (as opposed to fixed weekly schedule)  | The AQDMP will be updated to indicate a six day schedule.<br><br>BW Gold recognizes that management plans may need various updates as a result of permitting reviews. BW Gold will track all edits and discuss with EMLI and other regulators the appropriate timing to submit updated plans. As appropriate, updated plans will also be filed with other relevant regulators and Indigenous groups.   |
| 11  | Appendix 9-O section 8.3.6                    | Air              | BC ENV (Tarek Ayache)               | Jun 01, 2022                        | 1                       | New                                   |  |                             | For point source monitoring, it is stated that 'sampling and analysis must be conducted once every five years'.<br>Such a period is fairly long, please provide justification. Shorter sampling periods are typically recommended during the initial project phases to ensure proper operations of pollution control equipment, which may then be extended to longer sampling periods.<br>For the Fire Assay Main Lab and Propane smelting furnace, only Total Particulate Matter is listed as a parameter for monitoring.<br>Please provide justification for not including other gaseous parameters, such as SO2.   | The sampling and analysis will be conducted after the first year of operation and every five years after that, unless sampling indicates higher frequency is needed. With new equipment onsite, it is expected that this level of frequency will be sufficient for determining if emissions exceed permitted rates.<br>The amount of other gaseous parameters, such as SO2, that would be emitted by fire assaying ore would be insignificant. BW Gold has refined the project design and now intends to use an electric smelting furnace, eliminating the need for the propane smelting furnace. This makes the air emissions assessment conservative.  |
| 12  | Appendix 9-O page 8-8 Table 8.2-2             | Air              | BC ENV (Tarek Ayache)               | Jun 01, 2022                        | 1                       | New                                   |  |                             |   | BW Gold recognizes that management plans may need various updates as a result of permitting reviews. BW Gold will track all edits and discuss with EMLI and other regulators the appropriate timing to submit updated plans. As appropriate, updated plans will also be filed with other relevant regulators and Indigenous groups.  |
| 13  | Appendix 9-O section 8.3.7                    | Air              | BC ENV (Tarek Ayache)               | Jun 01, 2022                        | 1                       | New                                   |  |                             | 'Duplicate dustfall metals samples collected at each dustfall monitoring site'.<br>In section 8.3.2, it is stated that dustfall monitoring will not be conducted. Please explain or revise this discrepancy. However,   | Earlier versions of the AQMP included dustfall monitoring, as this type of monitoring is required under the Country Foods Monitoring Program (EAC Condition 41); it was included in both plans for consistency. However, because dustfall monitoring is no longer recommended for routine air quality monitoring (EMR/ENV 2018), this monitoring was removed from the AQMP and included only in the CFMP.<br><br>This in-text reference in the AQMP to "duplicate dustfall metals samples collected at each dustfall monitoring site" will be removed from the final version of the AQMP, as it was a remnant of text that has otherwise been removed.<br><br>Reference:<br>BC EMPR and BC ENV. 2019. Developing a Fugitive Dust Management Plan for Industrial Projects. Prepared by BC Ministries of Energy Mines and Petroleum Resources and British Columbia Ministry of Environment and Climate Change Strategy.<br><a href="https://www2.gov.bc.ca/assets/gov/environment/waste-management/industrial-waste/industrial-waste/mining-smelt-ore-roasting/industrial-waste/industrial-waste/industrial-waste-management-plan/industrial-waste-management-plan/industrial-waste-management-plan.pdf">https://www2.gov.bc.ca/assets/gov/environment/waste-management/industrial-waste/industrial-waste/mining-smelt-ore-roasting/industrial-waste/industrial-waste/industrial-waste-management-plan/industrial-waste-management-plan/industrial-waste-management-plan.pdf</a> |
| 14  | Appendix 9-O section 9.1 page 9-2             | Air              | BC ENV (Tarek Ayache)               | Jun 01, 2022                        | 1                       | New                                   |  |                             | 2nd paragraph, 'measurements at the operations camp'; please include the Tatakuz Lake site as per my previous comment.<br><br>4th paragraph, 'the frequency of elevated 24-hour fine PM concentrations and the rolling average of fine PM concentrations will be tracked and evaluated':<br>- if PM is to include PM2.5 and PM10, please remove 'fine' here and thereafter, as fine would refer to PM2.5 only (PM10 is referred to as coarse PM).<br>- who will conduct such analysis and how often?<br>- how can a rolling average be calculated based on non-continuous measurement? Instead, perhaps analysis of trends would be a more appropriate reference here.  | Monitoring will not occur at Tatakuz Lake, it will only at the operations camp.<br><br>The 4th paragraph will be updated to state "PM2.5 and PM10" instead of "Fine PM".<br><br>The analysis to develop a causal relationship between PM and operations/external factors will be conducted as part of annual reporting. This will be more explicitly stated in the updated AQDMP.<br>The term "analysis of trends" will be substituted for rolling average in future versions of the AQDMP.<br><br>However, a rolling average calculation does not require continuous (hourly) measurement. It only means that the averaging period contains a fixed number of values (n), and as more data becomes available, the last n-number values are used to calculate that average.  |
| 15  | Appendix 9-O Table 9.1-1                      | Air              | BC ENV (Tarek Ayache)               | Jun 01, 2022                        | 1                       | New                                   |  |                             | Location:<br>- the Tatakuz Lake site is not included.<br><br>Trigger - in reference to PM, SO2 & NO2:<br>- instead of 'Baseline Case', baseline concentrations obtained at the specific locations prior to the project's onset would be a better reference<br>- should location-specific baseline concentrations be obtained from monitoring, including predicted concentrations cannot be reasonably justified given their inherently high uncertainties. Only references to baseline concentrations and Ambient Air Quality Objectives would suffice and are adequate.<br><br>Fine PM:<br>- remove 'Fine' as per previous comment<br>- in addition to annual average PM10 and PM2.5 concentrations, please add reference to daily average concentrations w.r.t. baseline and AQO comparisons<br><br>SO2 and NO2:<br>- recognizing the longer sampling frequency (~30 days), would evaluations based on annual averages alone be sufficient to determine triggers? | Monitoring will not occur at Tatakuz Lake only at the operations camp. References to "Baseline Case" cannot be changed to "baseline concentrations at the monitoring station prior to construction" because pre-construction monitoring is not possible. Predicted concentrations will be used because pre-construction monitoring will not be possible as the start of construction is imminent.<br><br>"Fine" will be removed in future versions of the AQDMP.<br><br>The 24-hour CAQDS for PM2.5, NO2 and SO2 cannot be compared against monitoring data until 3 years of data have been collected so at this point adding references to these AQO is not appropriate.<br><br>In addition, PASS monitoring which provides monthly average concentrations for NO2 and SO2 cannot be used to compare against 24-hour AQO. The modelling of SO2 and NO2 does not suggest that exceedances of the 24-hour objectives will occur at sensitive receptors therefore the longer averaging period of the PASS monitoring is appropriate for confirming the conservative model predictions.<br><br>BW Gold recognizes that management plans may need various updates as a result of permitting reviews. BW Gold will track all edits and discuss with EMLI and other regulators the appropriate timing to submit updated plans. As appropriate, updated plans will also be filed with other relevant regulators and Indigenous groups.  |
| 15  | Appendix 9-O Table 9.1-1                      | Air              | BC ENV (Tarek Ayache)               | Jul 22, 2022                        | 2                       | Follow Up                             |  |                             | Understanding the provided justification, I am still concerned about using predicted concentrations given their inherently high uncertainties.<br>Moreover, baseline concentrations used in the application's assessment are almost 10 years old (2013), and I'm concerned about their representativeness of present conditions. Would it be possible to consider a baseline monitoring site that is little affected by construction activities? Could the Tatakuz Lake 28/Resort site be an option? Perhaps this critical matter can be resolved through discussions with Ministry staff.  | Based on discussions with BC ENV on August 11th, the AQDMP will be updated to remove comparison to predicted concentrations in the TARP (Table 9.1-1). Rather, monitored results will be compared to baseline concentrations and fractions of the applicable air quality objective.<br>The None trigger will be: Less than 50% of the annual PM10 or PM2.5 AQO<br>The Low trigger will be: greater than 50% of the annual PM10 or PM2.5 AQO<br>The Medium trigger will be: greater than 80% of the annual PM10 or PM2.5 AQO<br>The High trigger will be: greater than the annual PM10 or PM2.5 AQO<br><br>Similar changes will also be applied to SO2 and NO2 triggers.<br><br>No further baseline monitoring is required.   |

|     |   |                        |                             |              |   |           |               |  |  |   |
|-----|---|------------------------|-----------------------------|--------------|---|-----------|---------------|--|--|---|
| 16  | Appendix 9-O page 9-7   | Air                    | BC ENV (Tarek Ayache)       | Jun 01, 2022 | 1 | New       |               | 1st & 2nd paragraphs:<br>- what is the justification for '3-month rolling average PM2.5 concentration', especially based on non-continuous data?<br>- 'elevated 24-hour fine PM concentrations': relative to what? Baseline, exceedances?<br>- 'dust management monitoring': is that a typo?<br>- 'compare measurements to predictions from the effects assessment': revise reference to 'predictions' as per my previous comment.<br>- 'If there is an air quality advisory issued ... the EM will determine': how will such determination be made? | A rolling average does not require continuous data, see discussion in Comment #14.<br><br>The three-month period was chosen so that analysis could occur as data became available and not wait until annual reporting.<br><br>"Elevated" will be based on the numerical value of the 24-hour standards.<br><br>The word "monitoring" will be removed from "dust management monitoring".<br><br>Measurements cannot be compared to pre-construction monitoring, because the start of construction is imminent.<br><br>The determination will be made based on consultation with an air quality OP. The AQDMP text will be updated to reflect this change in future versions of the AQDMP. |   |
| 16  | Appendix 9-O page 9-7   | Air                    | BC ENV (Tarek Ayache)       | Jul 22, 2022 | 2 | Follow Up |               | Baseline concentrations, as per previous comment.  | Based on discussions with BC ENV on Aug 11 no further baseline monitoring is required.<br>Measured pre-construction monitoring concentrations will not be possible to use, because the start of construction is imminent.  |   |
| 17  | Appendix 9-O section 9.2  | Air                    | BC ENV (Tarek Ayache)       | Jun 01, 2022 | 1 | New       |               | 1st paragraph, "The predicted concentrations are considered to be baseline concentrations for the purposes of the FUP: measured baseline concentrations instead of predicted concentrations, as per my previous comment.   | BW Gold recognizes that management plans may need various updates as a result of permitting reviews. BW Gold will track all edits and discuss with EMLI and other regulators the appropriate timing to submit updated plans. As appropriate, updated plans will also be filed with other relevant regulators and Indigenous groups.  |   |
| 17  | Appendix 9-O section 9.2  | Air                    | BC ENV (Tarek Ayache)       | Jul 22, 2022 | 2 | Follow Up |               | Baseline concentrations, as per previous comment.  | Based on discussions with BC ENV on August 11 no further baseline monitoring is required.  |   |
| 198 | Table 8.2-1 of Appendix 9-O Air Quality and Fugitive Dust Management Plan | Reclamation            | EMLI (Liz Murphy)           | Jun 01, 2022 | 1 | New       | Clarification | Table 8.2-1 of Appendix 9-O Air Quality and Fugitive Dust Management Plan indicates that planned best management practices for dust control at the Low Grade Ore stockpile will be forming low horizontal piles and spraying water on hot dry days. Given the timeframe the stockpile is expected to be in place, please clarify how consistent application of water will occur when required.   | For daily management of the active tip head, water trucks will be used for dust suppression along the traffic areas and the dump face. For management of fugitive dust off the larger stockpile, a sprinkler system would be installed for problem areas. Water would be utilized from the collection pond and pumped to feed the system. For large flat areas exposed over the longer term, a chemical treatment (calcium or magnesium chloride) would be utilized.   |   |
| 199 | Table 8.2-1 of Appendix 9-O Air Quality and Fugitive Dust Management Plan | Reclamation            | EMLI (Liz Murphy)           | Jun 01, 2022 | 1 | New       | Clarification | No   | Table 8.2-1 of Appendix 9-O Air Quality and Fugitive Dust Management Plan indicates that planned best management practices for dust control on upper and lower waste rock piles include watering stockpiles on dry windy days or applying calcium chloride or magnesium chloride in freezing conditions. Please clarify how spraying will occur on these sites.  | For daily management of the active tip head, water trucks will be used for dust suppression along the traffic areas and the dump face. For management of fugitive dust off the larger stockpile, a sprinkler system would be installed for problem areas. Water would be utilized from the collection pond and pumped to feed the system. For large flat areas exposed over the longer term, a chemical treatment (calcium or magnesium chloride) would be utilized.  |
| 949 | AQDMP 1.4 Related Documents   | Monitoring             | LDN/UFN                     | Jun 08, 2022 | 1 | New       |               | No   | It is made clear how the results of the AQDMP will influence the CFMP, but not how the CFMP will influence the AQDMP. If the CFMP reveals concerns the AQDMP should be revised accordingly.  | BW Gold will make the suggested revision and include reference to the CFMP as a potential driver for AQDMP updates.   |
| 949 | AQDMP 1.4 Related Documents   | Monitoring             | LDN/UFN                     | Jul 22, 2022 | 2 | Follow Up | Comment       | No   | Please ensure comment is carried forward and revisions are included in the updated management plan.  | BW Gold recognizes that management plans may need various updates as a result of permitting reviews. BW Gold will track all edits and discuss with EMLI and other regulators the appropriate timing to submit updated plans. As appropriate, updated plans will also be filed with other relevant regulators and Indigenous groups.   |
| 950 | AQDMP 4. Adaptive Management Framework                                    | Planning               | LDN/UFN                     | Jun 08, 2022 | 1 | New       |               | No   | Plan section should include "Identify and characterize greenhouse gas emissions sources". Air quality includes more than just fugitive dust.   | Thank you for your response. It is BW Gold's understanding that this comment is now considered resolved as it relates to the Application Review phase of the permitting process. BW Gold understands this comment will be carried forward by LDN/UFN for use in post-permitting processes involving review of revised management plans.   |
| 950 | AQDMP 4. Adaptive Management Framework                                    | Planning               | LDN/UFN                     | Jul 22, 2022 | 2 | Follow Up | Clarification | No   | Specify the "emissions of criteria" and why the scope of management does not include GHG emissions. Request comment from MMO as to whether GHG emissions need not be addressed in management plans.  | The AQDMP is written to address emissions of criteria air contaminants, not GHGs. Therefore, no GHG-specific mitigations are included in this plan.   |
| 951 | AQDMP 4. Adaptive Management Framework                                    | Planning               | LDN/UFN                     | Jun 08, 2022 | 1 | New       |               | No   | Planning stage should also include the identification of potential impacted areas.   | Criteria air contaminants include PM10, PM2.5, SO2, NO2 and CO. They do not include GHGs. There is no requirement to include GHGs in the AQDMP. GHGs will be reported to BC ENV and ECCO if emissions exceed the regulatory threshold of 10,000 tonnes per year. BW Gold will be tracking GHG emissions to determine if a baseline is required.   |
| 951 | AQDMP 4. Adaptive Management Framework                                    | Planning               | LDN/UFN                     | Jul 22, 2022 | 2 | Follow Up | Comment       | No   | Please ensure comment is carried forward and revisions are included in the updated management plan.  | A bullet will be added under the subheading Plan (in Section 4.0) to include the identification of potential impact areas.<br><br>BW Gold recognizes that management plans may need various updates as a result of permitting reviews. BW Gold will track all edits and discuss with EMLI and other regulators the appropriate timing to submit updated plans. As appropriate, updated plans will also be filed with other relevant regulators and Indigenous groups.   |
| 952 | AQDMP 5.3.1 Open Pit  | Electric drills        | LDN/UFN                     | Jun 08, 2022 | 1 | New       |               | No   | Will the use of diesel drills be stopped once electric drills are fully operational after Year +5?   | Thank you for your response. It is BW Gold's understanding that this comment is now considered resolved as it relates to the Application Review phase of the permitting process. BW Gold understands this comment will be carried forward by LDN/UFN for use in post-permitting processes involving review of revised management plans.   |
| 953 | AQDMP 5.3.3 Tailings Storage Facility                                     | Clarification          | LDN/UFN                     | Jun 08, 2022 | 1 | New       |               | No   | Please be more specific to what "fairly coarse" means.   | Diesel drills will be progressively retired once they reach their optimal operating life.<br>The particle size distribution of the tailings samples is described in the previous sentence (approximately 44% fine sand, 46% silt and 10% clay). The particle size composition is considered "fairly coarse".  |
| 954 | AQDMP 7.1 Air Quality Objectives and Parameters of Concern                | Environment at factors | LDN/UFN                     | Jun 08, 2022 | 1 | New       |               | No   | Although identifying sensitive receptors for human health is important, sensitive ecological receptors should also be noted as fugitive dust may have an indirect effect on human health. Sensitive receptors should also include areas of cultural significance to the Indigenous communities.  | Ecological receptors and receptors with cultural significance to Indigenous communities will be considered for addition to Section 7.1. Locations of receptors with cultural significance will be considered when provided to BW Gold.<br><br>BW Gold recognizes that management plans may need various updates as a result of permitting reviews. BW Gold will track all edits and discuss with EMLI and other regulators the appropriate timing to submit updated plans. As appropriate, updated plans will also be filed with other relevant regulators and Indigenous groups. |
| 954 | AQDMP 7.1 Air Quality Objectives and Parameters of Concern                | Environment at factors | LDN/UFN                     | Jul 22, 2022 | 2 | Follow Up | Comment       | No   | Please ensure comment is carried forward and revisions are included in the updated management plan. Locations have been provided to BW Gold.   | Thank you for your response. It is BW Gold's understanding that this comment is now considered resolved as it relates to the Application Review phase of the permitting process. BW Gold understands this comment will be carried forward by LDN/UFN for use in post-permitting processes involving review of revised management plans.   |
| 955 | AQDMP 7.1 Air Quality Objectives and Parameters of Concern                | Environment at factors | LDN/UFN                     | Jun 08, 2022 | 1 | New       |               | No   | What assessments have been done to verify that adverse ecological effects won't occur?   | Chapter 6 of the MA/EMA permit application discusses the results of this EA. Further information can be found in the Project EA.  |
| 955 | AQDMP 7.1 Air Quality Objectives and Parameters of Concern                | Environment at factors | LDN/UFN                     | Jul 22, 2022 | 2 | Follow Up | Comment       | No   | Section 7.1 of this AP exclusively refers to impacts on human health, with no inclusion of ecological impacts. If ecological impacts were assessed, why are they omitted from this section? Did that assessment deem that there are no air quality objectives or parameters of concern in relation to ecological impacts? Not to mention impacts to wildlife, SO2 is known to cause water stress in plants, reduce growth and yield and increase senescence. For example, so we disagree that there are no applicable Air Quality Objectives and Parameters of Concern for ecological impacts.   | The ecological risk assessment, conducted as part of the EA, did not identify any criteria air contaminants as COPCs. Generally, risks to ecological receptors from criteria air contaminants are deemed negligible compared to risks from exposure to contaminants in soil, water, sediments, and food/feed. Ambient air quality objectives and the Canadian Ambient Air Quality Standards are designed for the protection of ecological and human health, and there are no Objectives or Standards specifically applicable for ecological impacts alone.                        |
| 956 | AQDMP 8.1 Training and Awareness  | Review                 | LDN/UFN                     | Jun 08, 2022 | 1 | New       |               | No   | Plan should be reviewed and updated at least annually.   | AQDMP Section 11 discusses annual plan review.  |
| 957 | AQDMP 8.1 Training and Awareness  | Training               | LDN/UFN                     | Jun 08, 2022 | 1 | New       |               | No   | Employees and contractor should receive annual refresher training  | Thank you for noting this.<br><br>BW Gold will revise the text in a future iteration of the plan to include that employees and contractors should receive annual refresher training.  |
| 957 | AQDMP 8.1 Training and Awareness  | Training               | LDN/UFN                     | Jul 22, 2022 | 2 | Follow Up | Comment       | No   | Please ensure comment is carried forward and revisions are included in the updated management plan.  | Thank you for your response. It is BW Gold's understanding that this comment is now considered resolved as it relates to the Application Review phase of the permitting process. BW Gold understands this comment will be carried forward by LDN/UFN for use in post-permitting processes involving review of revised management plans.   |
| 958 | AQDMP Table 8.2-1: Air Quality Mitigation Measures                        | Mitigations            | LDN/UFN                     | Jun 08, 2022 | 1 | New       |               | No   | Open pit - Educating those involved in material planning is a good start, however standards that prohibit excess drop heights should be implemented rather than just training on the importance of minimizing. Creating standards in which employees and contractor must abide by has a higher likelihood of success   | Thank you for noting this. BW Gold appreciates the comment and will consider this in development of our training programs.  |
| 958 | AQDMP Table 8.2-1: Air Quality Mitigation Measures                        | Mitigations            | LDN/UFN                     | Jul 22, 2022 | 2 | Follow Up | Follow Up     | No   | As the previous comment indicated, training alone is not an adequate response. We request standards to be set, which limit drop heights.   | Drop heights are determined by many factors including current operational requirements, the composition of the material being moved, the moisture content and current and historical meteorological conditions. The training provided to operators will help them make the best judgement on drop heights based on the factors described above with the overall goal of always minimizing drop heights.   |
| 959 | AQDMP Table 8.2-1: Air Quality Mitigation Measures                        | Clarification          | LDN/UFN                     | Jun 08, 2022 | 1 | New       |               | No   | Production drilling - please clarify the rationale for what is considered "very dry conditions (less than 0.25 mm/day over a week". Why was this chosen rather than the use of wet drilling at all times?  | Wet drilling is not required at all times. Therefore, a trigger based on professional judgement was included in the AQDMP.  |
| 960 | AQDMP Table 8.2-1: Air Quality Mitigation Measures                        | Clarification          | LDN/UFN                     | Jun 08, 2022 | 1 | New       |               | No   | Production blasting - What are the weather cutoffs for determining if impacts will occur?  | AQDMP will be updated to "Where dust or fume impacts on employees and environment cannot be avoided, blasting must be postponed until wind direction does not disperse emissions towards employees or local sensitive receptors. The Drill and Blast Superintendent and Mine manager will ultimately decide when to postpone blasting (the EM and Health and Safety can inform this decision)."   |
| 960 | AQDMP Table 8.2-1: Air Quality Mitigation Measures                        | Clarification          | LDN/UFN                     | Jul 22, 2022 | 2 | Follow Up | Comment       | No   | Please ensure comment is carried forward and revisions are included in the updated management plan.  | Thank you for your response. It is BW Gold's understanding that this comment is now considered resolved as it relates to the Application Review phase of the permitting process. BW Gold understands this comment will be carried forward by LDN/UFN for use in post-permitting processes involving review of revised management plans.   |
| 961 | AQDMP Table 8.2-1: Air Quality Mitigation Measures                        | Clarification          | LDN/UFN                     | Jun 08, 2022 | 1 | New       |               | No   | Concrete batch plants - Please specify what a "low" pile is  | A low pile does not have a specific height, but will be based on minimizing the surface area exposed to the wind.   |
| 961 | AQDMP Table 8.2-1: Air Quality Mitigation Measures                        | Clarification          | LDN/UFN                     | Jul 22, 2022 | 2 | Follow Up | Comment       | No   | A maximum height should be included for clarity for employees.   | The height of the piles is dependent on conditions at site and particle size of stockpile. Refer to TARP for stockpiles and Fugitive Dust SOP.  |
| 961 | AQDMP Table 8.2-1: Air Quality Mitigation Measures                        | Clarification          | LDN/UFN (Christina Delaney) | Sep 01, 2022 | 3 | Follow Up | Comment       | No   | Heights are included for other items in the left column, we request clarification on the height that is considered to be "low" for all situations of piles.  | The maximum height will be approximately 10 m.  |
| 962 | AQDMP Table 8.2-1: Air Quality Mitigation Measures                        | Clarification          | LDN/UFN                     | Jun 08, 2022 | 1 | New       |               | No   | Aggregate crushing and screening areas - Please specify what a "low" pile is   | A low pile does not have a specific height, but will be based on minimizing the surface area exposed to the wind.   |
| 962 | AQDMP Table 8.2-1: Air Quality Mitigation Measures                        | Clarification          | LDN/UFN                     | Jul 22, 2022 | 2 | Follow Up | Comment       | No   | A maximum height should be included for clarity for employees.   | The height of the piles is dependent on conditions at site and particle size of stockpile. Refer to TARP for stockpiles and Fugitive Dust SOP.  |
| 962 | AQDMP Table 8.2-1: Air Quality Mitigation Measures                        | Clarification          | LDN/UFN (Christina Delaney) | Sep 01, 2022 | 3 | Follow Up | Comment       | No   | Heights are included for other items in the left column, we request clarification on the height that is considered to be "low" for all situations of piles.  | The maximum height will be approximately 10 m.  |

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| 962 | AQDMP Table 8.2-1: Air Quality Mitigation Measures         | Clarification   | LDN/UFN (Christina Delaney) | Nov 17, 2022 | 4 | Follow Up     | No      | We request your commitment to add the detail provided in the updated plan.  | BW Gold commits to clarifying in the next version of the plan that the term "low piles" in the context of the reviewer's comment are to have a maximum height of approximately 10 m.<br><br>BW Gold recognizes that management plans may need various updates as a result of permitting reviews. BW Gold will track all edits and discuss with EMLI and other regulators the appropriate timing to submit updated plans. As appropriate, updated plans will also be filed with other relevant regulators and Indigenous groups.   |
| 963 | AQDMP Table 8.2-1: Air Quality Mitigation Measures         | Clarification   | LDN/UFN                     | Jun 08, 2022 | 1 | New           | No      | TSF, Site C, etc. - What sort of considerations are being taken to ensure that the application of calcium chloride (or magnesium chloride) as a contingency will not result in more harm to the direct environment (i.e., long-term effects to surrounding vegetation and runoff into nearby water bodies)? | When used appropriately, there are limited effects of using calcium chloride. Calcium chloride is a common substance used to control fugitive dust. BW Gold will follow guidance from the BC best practice manual on fugitive dust management, ( <a href="https://www2.gov.bc.ca/assets/gov/environment/waste-management/municipal-waste/industrial-waste/mining-ore-energy/guidance-documents/dust_management_plan_guidance.pdf">https://www2.gov.bc.ca/assets/gov/environment/waste-management/municipal-waste/industrial-waste/mining-ore-energy/guidance-documents/dust_management_plan_guidance.pdf</a> ), which refers to the best management practice manual from the NWT: ( <a href="https://www.emr.gov.nt.ca/sites/emr/files/guidelines/dustsuppression.pdf">https://www.emr.gov.nt.ca/sites/emr/files/guidelines/dustsuppression.pdf</a> ).<br><br>The application rate of dust suppressant will be carefully monitored to ensure adequate coverage without pooling or runoff of products. The amount of dust suppressant applied will not exceed the minimum amount required to effectively suppress dust. Dust suppressant will be bladed or incorporated into the road immediately upon application, to ensure the product does not migrate off the roadway. There will be no evidence of excess product on the roadway. The dust suppressant will not migrate or run off the traveled portion of the roadway.<br><br>BW Gold will revise the plan to indicate this change. BW Gold recognizes that management plans may need various updates as a result of permitting reviews. BW Gold will track all edits and discuss with EMLI and other regulators the appropriate timing to submit updated plans. As appropriate, updated plans will also be filed with other relevant regulators and Indigenous groups. |
| 963 | AQDMP Table 8.2-1: Air Quality Mitigation Measures         | Clarification   | LDN/UFN                     | Jul 27, 2022 | 2 | Follow Up     | Comment | Please ensure comment is carried forward and revised text mentioned in above response is included in the updated management plan.   | Thank you for your response. It is BW Gold's understanding that this comment is now considered resolved as it relates to the Application Review phase of the permitting process. BW Gold understands this comment will be carried forward by LDN/UFN for use in post-permitting processes involving review of revised management plans.   |
| 964 | AQDMP Table 8.2-1: Air Quality Mitigation Measures         | Clarification   | LDN/UFN                     | Jun 08, 2022 | 1 | New           | No      | TSF and Mine Haulage and service roads - Please indicate how often visual inspections will occur.   | See Table 9.1-1 for frequency.  |
| 964 | AQDMP Table 8.2-1: Air Quality Mitigation Measures         | Clarification   | LDN/UFN                     | Jul 27, 2022 | 2 | Follow Up     | Comment | Table 9.1-1 outlines frequency of visual inspections for roads but not the TSF.   | Visual inspection frequency for TSF will match the time frame for roads (2 hours). Table 9.1-1 will be updated to include this information. BW Gold recognizes that management plans may need various updates as a result of permitting reviews. BW Gold will track all edits and discuss with EMLI and other regulators the appropriate timing to submit updated plans. As appropriate, updated plans will also be filed with other relevant regulators and Indigenous groups.   |
| 965 | AQDMP Table 8.2-1: Air Quality Mitigation Measures         | Standards       | LDN/UFN                     | Jul 22, 2022 | 2 | Follow Up     | Comment | Please ensure comment is carried forward and information describing the no-idling policy is included in the updated management plan.  | Thank you for your comment, this change will be made.<br><br>It is BW Gold's understanding that this comment is now considered resolved as it relates to the Application Review phase of the permitting process. BW Gold understands this comment will be carried forward by LDN/UFN for use in post-permitting processes involving review of revised management plans.   |
| 965 | AQDMP Table 8.2-4: Air Quality Mitigation Measures         | Standards       | LDN/UFN                     | Jun 08, 2022 | 1 | New           | Yes     | Vehicles - Suggest implementing a no idling policy  | A no-idling policy will be implemented, except for extenuating circumstances during the winter where cold starts and stopping could wear on mining equipment.<br><br>BW Gold recognizes that management plans may need various updates as a result of permitting reviews. BW Gold will track all edits and discuss with EMLI and other regulators the appropriate timing to submit updated plans. As appropriate, updated plans will also be filed with other relevant regulators and Indigenous groups.  |
| 966 | AQDMP Table 8.2-1: Air Quality Mitigation Measures         | Missing content | LDN/UFN                     | Jun 08, 2022 | 1 | New           | No      | No air quality mitigations have been put forward regarding GHG emissions  | The AQDMP is written to address emissions of criteria air contaminants, not GHGs. Therefore no GHG-specific mitigations are included in this plan.  |
| 966 | AQDMP Table 8.2-1: Air Quality Mitigation Measures         | Missing content | LDN/UFN                     | Jul 27, 2022 | 2 | Follow Up     | Comment | See response from comment ID 950. Where can air quality mitigations regarding GHG emissions be found in the application?  | There is no requirement to include GHGs in the AQDMP. GHGs will be reported to BC ENV and ECCIC if emissions exceed the regulatory threshold of 10,000 tonnes per year. BW Gold will be tracking GHG emissions and determine if reporting is required and also for the purposes of annual ESG reporting under various frameworks that BWG is currently undergoing a selection process for.  |
| 966 | AQDMP Table 8.2-1: Air Quality Mitigation Measures         | Missing content | LDN/UFN                     | Sep 01, 2022 | 3 | Follow Up     | Comment | Thank you for that information. How, when and how frequently will this GHG quantity be communicated to the nations? Please indicate a communication commitment to the nations for all atmospheric impacts, including GHG emissions.   | GHG emissions that exceed the regulatory threshold of 10,000 tonnes per year will be reported and provided to first nations by July 1st each year. The reports will be sent via email directly to first nations.  |
| 967 | AQDMP 8.3.4 Nitrogen Dioxide and Sulfur Dioxide Monitoring | Clarification   | LDN/UFN                     | Jun 08, 2022 | 1 | New           | No      | How will hourly NO2 and SO2 be measured for comparison against the CAAQS?   | Hourly NO2 and SO2 will not be measured, because modelling results indicate that no exceedances of hourly standards are expected at sensitive receptor sites. The monitoring for NO2 and SO2 will be conducted using the radiello passive monitoring system that provides monthly average concentrations.   |
| 968 | AQDMP 8.3.5 Carbon Monoxide                                | Missing content | LDN/UFN                     | Jun 08, 2022 | 1 | New           | No      | Regardless of expected CO amount, Condition 6.12 of the DS requires a CO monitoring program. Discussion around decreasing or excluding monitoring should only take place once it is proven that the project is well below objectives.   | The AQDMP will be updated to include monitoring of CO. BW Gold recognizes that management plans may need various updates as a result of permitting reviews. BW Gold will track all edits and discuss with EMLI and other regulators the appropriate timing to submit updated plans. As appropriate, updated plans will also be filed with other relevant regulators and Indigenous groups.  |
| 968 | AQDMP 8.3.5 Carbon Monoxide                                | Missing content | LDN/UFN                     | Jul 27, 2022 | 2 | Carry Forward | Comment | This is a DS requirement therefore needs to be included in the management plan.   | A CO monitoring plan will be included in an updated AQDMP. This will comprise monitoring for CO at the workers camp using passive monitoring.   |
| 969 | AQDMP Table 9.1-1: Trigger Action Response                 | Clarification   | LDN/UFN                     | Jun 08, 2022 | 1 | New           | No      | Unpaved roads - unsure what the different is between "none" and "low" trigger   | As stated in Table 9.1-1:<br>None - Dust plume less than half the height of a haul truck tire.<br>Low - Dust plume less than half the size of a haul truck for any period of time up to 30 minutes."  |
| 970 | AQDMP Table 9.1-1: Trigger Action Response                 | Clarification   | LDN/UFN                     | Jun 08, 2022 | 1 | New           | No      | Surface earthworks - please define what "minor localized dust" is   | Minor localized dust indicates dust plumes that are less than 2 metres in height. BW Gold will clarify this definition in a future iteration of the plan.<br><br>BW Gold recognizes that management plans may need various updates as a result of permitting reviews. BW Gold will track all edits and discuss with EMLI and other regulators the appropriate timing to submit updated plans. As appropriate, updated plans will also be filed with other relevant regulators and Indigenous groups.  |
| 970 | AQDMP Table 9.1-1: Trigger Action Response                 | Clarification   | LDN/UFN                     | Jul 27, 2022 | 2 | Carry Forward | Comment | Please ensure comment is carried forward and this definition is included in the next update of the plan.  | Thank you for your comment, this change will be made.<br><br>It is BW Gold's understanding that this comment is now considered resolved as it relates to the Application Review phase of the permitting process. BW Gold understands this comment will be carried forward by LDN/UFN for use in post-permitting processes involving review of revised management plans.   |
| 971 | AQDMP Table 9.1-1: Trigger Action Response                 | Clarification   | LDN/UFN                     | Jun 08, 2022 | 1 | New           | No      | Surface earthworks (low) - what if the construction consists of moving material (i.e., how will this be minimized)? Define what minimize actually looks like (e.g., restricting movement to certain piles, areas?)  | "Minimize" means to reduce earth moving activity while the "low" trigger is still in effect.  |
| 972 | AQDMP Table 9.1-1: Trigger Action Response                 | Clarification   | LDN/UFN                     | Jun 08, 2022 | 1 | New           | No      | Stockpiles - please define what "minor localized dust" is   | Minor localized dust indicates dust plumes that are less than 2 metres in height. BW Gold will clarify this definition in a future iteration of the plan.<br><br>BW Gold recognizes that management plans may need various updates as a result of permitting reviews. BW Gold will track all edits and discuss with EMLI and other regulators the appropriate timing to submit updated plans. As appropriate, updated plans will also be filed with other relevant regulators and Indigenous groups.  |
| 972 | AQDMP Table 9.1-1: Trigger Action Response                 | Clarification   | LDN/UFN                     | Jul 27, 2022 | 2 | Carry Forward | Comment | Please ensure comment is carried forward and this definition is included in the next update of the plan.  | Thank you for your comment, this change will be made.<br><br>It is BW Gold's understanding that this comment is now considered resolved as it relates to the Application Review phase of the permitting process. BW Gold understands this comment will be carried forward by LDN/UFN for use in post-permitting processes involving review of revised management plans.   |
| 973 | AQDMP Table 9.1-1: Trigger Action Response                 | Clarification   | LDN/UFN                     | Jun 08, 2022 | 1 | New           | No      | Material handling - please define what "minor localized dust" is  | Minor localized dust indicates dust plumes that are less than 2 metres in height. BW Gold will clarify this definition in a future iteration of the plan.<br><br>BW Gold recognizes that management plans may need various updates as a result of permitting reviews. BW Gold will track all edits and discuss with EMLI and other regulators the appropriate timing to submit updated plans. As appropriate, updated plans will also be filed with other relevant regulators and Indigenous groups.  |
| 973 | AQDMP Table 9.1-1: Trigger Action Response                 | Clarification   | LDN/UFN                     | Jul 27, 2022 | 2 | Carry Forward | Comment | Please ensure comment is carried forward and this definition is included in the next update of the plan.  | Thank you for your comment, this change will be made.<br><br>It is BW Gold's understanding that this comment is now considered resolved as it relates to the Application Review phase of the permitting process. BW Gold understands this comment will be carried forward by LDN/UFN for use in post-permitting processes involving review of revised management plans.   |
| 974 | AQDMP Table 9.1-1: Trigger Action Response                 | Clarification   | LDN/UFN                     | Jun 08, 2022 | 1 | New           | No      | Fine PM & SO2/NOx - Management responses don't actually propose any mitigations but rather says they will be developed. Please clarify what the "associated mitigations" are - it's understood they may differ pending on the source, but can still be generalized here                                     | The reason specific mitigations are not mentioned is that there are too many possible outcomes of the causal analysis. Additionally, for each of the possible causes, there may be a number of possible mitigations that would be most effective. The mitigations will also be dependent on the month/season, the PM2.5/NO2 values that were found, meteorological conditions at the time and what is practical from a mine operations perspective.<br><br>Consequently, the possible number of specific mitigations becomes too high to reasonably list in the AQDMP.  |

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| 974 | AQDMP Table 9.1-1: Trigger Action Response | Clarification  | LDN/UFN                     | Jul 27, 2022 | 2 | Follow up     | Comment | No | If the number of mitigation measures is too high to list in the AQDMP, please state where they can be found. As stated in the original comment, these can be high level mitigations depending on the season/conditions/etc., but there should still be some kind of framework laid out for Fine PM <sub>10</sub> /NO <sub>x</sub>   | There are best management practices referenced in the AQDMP that build on the listed mitigations. These are the high level types of mitigations that are available for use. BW Gold has not developed a single list with all possible mitigations. The causal analysis is designed to identify non-standard mitigations that are targeted towards specific cases under specific conditions. Therefore, re-listing existing or generic types of mitigation does not further the explanation of how causal analysis is to be used.   |
| 974 | AQDMP Table 9.1-1: Trigger Action Response | Clarification  | LDN/UFN (Christina Delaney) | Sep 01, 2022 | 3 | Follow Up     | Comment | No | Acknowledging your response, the framework and decision making process could be described by adding some examples of mitigations that would be applied for the most common, or most likely to be anticipated sources and conditions.  | The reviewers comment is acknowledged, however the most common types of mitigations are already listed in the AQDMP. The causal analysis is used to help identify conditions under which the most common mitigations were not successful and more targeted or specific mitigations can be developed.   |
| 975 | AQDMP 9.2 Follow-up program                | Mitigations    | LDN/UFN                     | Jun 08, 2022 | 1 | New           |         | No | Medium / High - Mitigations should be implemented BEFORE guidelines are exceeded as to not exceed them  | Mitigations that are identified based on causal analysis will be implemented as guidelines are approached (not exceeded). BW Gold will clarify this in the plan.   |
| 975 | AQDMP 9.2 Follow-up program                | Mitigations    | LDN/UFN                     | Jul 27, 2022 | 2 | Carry Forward | Comment | No | Please ensure comment is carried forward and this clarification is included in the next update of the plan.   | Thank you for your comment, this change will be made.  |
| 976 | AQDMP 9.2 Follow-up program                | Follow-up      | LDN/UFN                     | Jun 08, 2022 | 1 | New           |         | No | The follow-up program is significantly lacking in details as per the conditions in Federal DS 2.5 (i.e., frequency, timing, levels of change over baseline, etc.). Please review 2.5 and revise the follow-up program accordingly.  | Section 2.5 will be reviewed and clarification provided as required.   |
| 976 | AQDMP 9.2 Follow-up program                | Follow-up      | LDN/UFN                     | Jul 27, 2022 | 2 | Follow up     | Comment | No | These details are requirements of the Federal DS - updates need to be made. Please indicate what details will be added in order to meet the requirements for Federal DS conditions.   | BW Gold recognizes that management plans may need various updates as a result of permitting reviews. BW Gold will track all edits and discuss with EMLI and other regulators the appropriate timing to submit updated plans. As appropriate, updated plans will also be filed with other relevant regulators and Indigenous groups.  |
| 977 | AQDMP                                      |                | LDN/UFN                     | Jun 08, 2022 | 1 | New           |         | No | What organizations or networks have been sought in which all collected data can help better understand regional, provincial, or federal air quality trends (e.g. National Air Pollution Surveillance (NAPS) program)?<br>Add section 8.3 (monitoring) to location in the plan   | BW Gold will make the suggested revision.  |
| 978 | AQDMP Appendix A                           | Condition 2e   | LDN/UFN                     | Jun 08, 2022 | 1 | New           |         | No |   | BW Gold recognizes that management plans may need various updates as a result of permitting reviews. BW Gold will track all edits and discuss with EMLI and other regulators the appropriate timing to submit updated plans. As appropriate, updated plans will also be filed with other relevant regulators and Indigenous groups.  |
| 978 | AQDMP Appendix A                           | Condition 2e   | LDN/UFN                     | Jul 27, 2022 | 2 | Carry Forward | Comment | No | Please ensure comment is carried forward and this revision is included in the next update of the plan.  | Thank you for your comment, this change will be made.  |
| 979 | AQDMP Appendix A                           | Condition 3d   | LDN/UFN                     | Jun 08, 2022 | 1 | New           |         | No | Monitoring, with methods, timing, frequency etc... is section 8 not 9 of the plan   | BW Gold will make the suggested revision.  |
| 979 | AQDMP Appendix A                           | Condition 3d   | LDN/UFN                     | Jul 27, 2022 | 2 | Carry Forward | Comment | No | Please ensure comment is carried forward and this revision is included in the next update of the plan.  | Thank you for your comment, this change will be made.  |
| 980 | AQDMP Appendix A                           | Condition 20a  | LDN/UFN                     | Jun 08, 2022 | 1 | New           |         | No | Section 12 does not identify the means by which the mitigation measures will be implemented. Please update.   | BW Gold will make the suggested revision.  |
| 980 | AQDMP Appendix A                           | Condition 20a  | LDN/UFN                     | Jul 27, 2022 | 2 | Follow up     | Comment | No | Identifying the means by which the mitigations measures will be implemented is a requirement of Condition 20a. Please detail how this will be included in the next update. Section 9 does not state that a follow-up program will be implemented during all project phases. Rather, it directly copies the condition. Please clarify that a follow-up program will be implemented. Further, section 9.1 does not state that carbon monoxide will be monitored. As per condition 6.12, this must be monitored. Finally, condition 2.10 of the DS states "the proponent shall discuss the follow-up program with Indigenous groups and determine, in consultation with Indigenous groups, opportunities for their participation in the implementation of the follow-up program". This is not included in section 9. | Condition 20a is discussed in Section 12 (OP), Section 8.2 (mitigations), and Section 9.1 (mitigations and trigger-action response plan).<br>BW Gold will be more explicit in stating that the follow-up program will be implemented in all phases of the Project. This will be added to section 9.2 in a future iteration of the plan.  |
| 981 | AQDMP Appendix B                           | Condition 6.12 | LDN/UFN                     | Jun 08, 2022 | 1 | New           |         | No |   | The AQDMP will be updated to include monitoring of CO.   |
| 981 | AQDMP Appendix B                           | Condition 6.12 | LDN/UFN                     | Jul 27, 2022 | 2 | Carry Forward | Comment | No | Please ensure comment is carried forward and these updates are included in the next update of the plan.   | Section 9.2 will be updated to include reference to the discussion of the follow-up program with Indigenous Groups. Referenced to consultation with Indigenous Groups is made in Sections 8.4.9, 10.1.3, and 11.   |
| 982 | AQDMP Appendix B                           | Condition 6.15 | LDN/UFN                     | Jun 08, 2022 | 1 | New           |         | No | Section 10.1.2 does not state that "a plan to communicate results of the follow-up program" will be developed prior to construction as per condition 6.12   | BW Gold will make the suggested revision.  |
| 982 | AQDMP Appendix B                           | Condition 6.15 | LDN/UFN                     | Jul 27, 2022 | 2 | Carry Forward | Comment | No | Please ensure comment is carried forward and these updates are included in the next update of the plan.   | It is BW Gold's understanding that this comment is now considered resolved as it relates to the Application Review phase of the permitting process. BW Gold understands this comment will be carried forward by LDN/UFN for use in post-permitting processes involving review of revised management plans.   |
| 983 | AQDMP Appendix B                           | General        | LDN/UFN                     | Jun 08, 2022 | 1 | New           |         | No | There are several conditions highlighted in this concordance table that are a straight "copy & paste" into the plan. This does not address the how, what, when, where etc... of the condition, nor does it show commitment to executing the condition. These must be explained within the plan itself. For example, section 9 does not identify how various components of the conditions will be implemented. Further clarification of the conditions should be addressed.  | The concordance tables in the Appendices refer to the sections of the AQDMP where those specific conditions are addressed. See comment response #81 for specific reference to Section 9.2 and the follow-up program.   |
| 983 | AQDMP Appendix B                           | General        | LDN/UFN                     | Jul 27, 2022 | 2 | Follow up     | Comment | No | Comment D981 outlines the update to include reference to the discussion of the follow-up program with Indigenous Groups. The original comment here is asking for more detail on the how, what, when, where etc. of the conditions regarding follow up program and adaptive management. Please detail how various components of the conditions will be implemented and how this revision will be included in the updated plan.   | Based on DS condition 2.5 the follow-up program is required to have certain information. Below is a list of the sections of that require information and where it is located in the AQDMP and, if not currently in the AQDMP, how it will be addressed.<br>2.5.1 - the follow-up program will be overseen by a Qualified Professional including signing off on annual reporting - this will be explicitly stated.<br>2.5.2 - all monitoring is discussed in Section 8.3<br>2.5.3 - all reporting is discussed in Section 10.1.2. The conditions related to reporting are listed here indicating all the requirements will be met.<br>2.5.4 - the levels of environmental change are already listed in Section 9.2<br>2.5.5 - all mitigation is discussed in Sections 8.2 and 9.1 |
| 984 | AQDMP Appendix C                           | Condition 3.2  | LDN/UFN                     | Jun 08, 2022 | 1 | New           |         | No | Section 5.3 does not provide an overview of site activities that could result in fugitive dust  | This is included in Section 6 (Table 6-1), and can be added as a cross-reference in Section 5.3.   |
| 985 | AQDMP Appendix C                           | Condition 3.3  | LDN/UFN                     | Jun 08, 2022 | 1 | New           |         | No | Figure 5.3-3 does not describe process that have the potential to emit fugitive dust  | This is included in Section 6 and can be added as a cross-reference in Section 5.3.  |

|      |                                     |                                |                             |              |   |           |                         |   |  |
|------|-------------------------------------|--------------------------------|-----------------------------|--------------|---|-----------|-------------------------|---|--|
| 986  | AQDMP Appendix D SOP                | Table 5.1-1                    | LDN/UFN                     | Jun 08, 2022 | 1 | New       | No                      | Please define the size and height of a haul truck for response action implementation  | The size of a haul truck for response action implementation is 13.7 m long and 6.5 m high. This information can be added in Section 5.3.1 in the next iteration of the plan.   |
| 1570 | Chapter 7 Section 7.4               | Environment Monitoring Program | LDN/UFN                     | Jun 11, 2022 | 0 | -         | Yes                     | Summarize the assessment of the potential environmental effects, risks, and mitigation/management plans to be followed during emergencies and unexpected shutdown events for the pollution control systems.<br>Provide more detail on effects, risks, and plans to be followed during emergencies/shutdowns within Appendix 9-0 (Air Quality and Fugitive Dust Management Plan).  | The Appendix 9-0 will be updated to incorporate discussion on anticipated permit conditions in respect of:<br>- General Direction and Emergency Procedures<br>- Bypasses<br>- Process Modifications<br>- Standard Conditions<br>- QP sign-off  |
| 1570 | Chapter 7 Section 7.4               | Environment Monitoring Program | LDN/UFN                     | Jun 11, 2022 | 0 | -         | No                      | Resolved pending addition of discussion mentioned in response (General direction and emergency procedures, bypasses, etc.)  | QP sign-off has been included in the revised Appendix 9-0. Additional edits will be completed following Application Review.  |
| 1570 | Chapter 7 Section 7.4               | Environment Monitoring Program | LDN/UFN                     | Jun 11, 2022 | 0 | -         | No                      | The above mentioned additions were not found.   |  |
| 1570 | Chapter 7 Section 7.4               | Environment Monitoring Program | LDN/UFN                     | Jun 11, 2022 | 1 | New       | No                      | Follow up to confirm these additional edits are completed.  | BW Gold will make this revision in a subsequent iteration of the plan.<br><br>BW Gold recognizes that management plans may need various updates as a result of permitting reviews. BW Gold will track all edits and discuss with EMLI and other regulators the appropriate timing to submit updated plans. As appropriate, updated plans will also be filed with other relevant regulators and Indigenous groups.  |
| 2085 | APPENDIX 9-0 Section 8.3.3          | AQDMP                          | Northern Health (Paula Tat) | Jul 22, 2022 | 2 | New       | No                      | NH asks that the particulate monitoring program incorporate metals monitoring. Metals are not only a concern for county foods management, but also for inhalation by camp residents. NH has experience following up on a situation at a different mine where mine camp residents were found to have elevated blood lead levels associated with lead dust in the camp. We ask that this program be maintained for a period long enough (representative) to characterize true health risk to nearby receptors. This program should verify any uncertainties (baseline) and the conservativeness of modelled COPC predictions, especially since potential exceedances of chromium were identified at 2 receptor locations in the modelling report (as described in the next comment). A trigger action response plan should be included for COPCs monitored. | Metals in dustfall will be monitored as part of the CFMP. The HHERA did not identify any airborne metals as COPCs and therefore we do not see the need for ongoing monitoring. The chromium modelled as part of the air dispersion modelling was incorrectly compared to the hexavalent chromium criteria in Ontario rather than metallic chromium. The metallic chromium criteria of 0.5 ug/m <sup>3</sup> over 24-hours was not exceeded in the modelling with a maximum predicted concentration of 8.99 x 10 <sup>-4</sup> ug/m <sup>3</sup> .  |
| 2086 | APPENDIX 9-0 Page 52                | AQDMP                          | Northern Health (Paula Tat) | Jul 22, 2022 | 2 | New       | No                      | Although these guidelines should not be used to assess regulatory compliance, a review of the maximum concentrations indicates that all of the maximum predicted values are less than the presented guidelines, with the exception of 24-hour chromium at the Blackwater-Spruce Ranch and 24-hour and annual chromium at Talekuz Lake Resort. NH asks that this exceedance be investigated and health risks managed through the monitoring program in the AQDMP.  | The chromium modelled as part of the air dispersion modelling was incorrectly compared to the hexavalent chromium criteria in Ontario rather than metallic chromium. The metallic chromium criteria of 0.5 ug/m <sup>3</sup> over 24-hours was not exceeded in the modelling with a maximum predicted concentration of 8.99 x 10 <sup>-4</sup> ug/m <sup>3</sup> .   |
| 2087 | APPENDIX 9-0 Section 8.3 Monitoring | AQDMP                          | Northern Health (Paula Tat) | Jul 22, 2022 | 2 | New       | No                      | NH asks that the monitoring program incorporate PAH monitoring which addresses the potential exceedance of benzo(a)pyrene described in the modelling report (as described in the next comment). A trigger action response plan should be included for COPCs monitored.  | The assessment in the HHERA for the EA shows that hazard quotients and incremental lifetime cancer risks (HQs/ILCRs) were incredibly low for PAHs, so there is no need to include them in the monitoring program. All modelling done and emissions estimates were conservative in nature and therefore are likely over predictions of actual ambient concentrations. In addition, since the original EA there have been decreases in emissions due to Project changes, which would result in lower modelled predictions of PAHs.   |
| 2088 | APPENDIX 9-0 Page 55                | AQDMP                          | Northern Health (Paula Tat) | Jul 22, 2022 | 2 | New       | No                      | Although these guidelines should not be used to assess regulatory compliance, a review of the maximum concentrations indicates that the 24-hour benzo(a)pyrene guidelines is exceeded at all four locations and the lower annual guideline is exceeded at the Blackwater-Spruce Ranch and the Talekuz Lake Resort. NH asks that this exceedance be investigated and health risks managed through the monitoring program in the AQDMP.   | The assessment in the HHERA for the EA shows that hazard quotients and incremental lifetime cancer risks (HQs/ILCRs) were incredibly low for PAHs, so there is no need to include them in the monitoring program. All modelling done and emissions estimates were conservative in nature and therefore are likely over predictions of actual ambient concentrations. In addition, since the original EA there have been decreases in emissions due to Project changes, which would result in lower modelled predictions of PAHs.   |
| 2091 | Appendix 9-0, Section 8.3.1         | Effluent                       | BC ENV (Anna Akkerman)      | Jul 12, 2022 | 2 | New       | Yes                     | I appreciate the description of the proposed climate monitoring plan. I will likely recommend a permit condition that will require continuous meteorological monitoring as proposed and will reference standards for instrumentation accuracy, operation and maintenance.   | BW Gold acknowledges the comment.  |
| 2099 | Table 5.2-5                         | Air                            | BC ENV (Breanne Hill)       | Jul 14, 2022 | 1 | New       | Information Requirement | When particulate matter data is collected it is generally collected at or near a meteorological station. Please explain the rationale for not having the meteorological and particulate matter sampling units in the same location and how the meteorological data will be used when interpreting the particulate matter data.  | The Blackwater High meteorological station is located approximately 2 km from the air quality station at the workers camp. The area has limited topographic relief therefore it is anticipated that meteorological conditions at the met station will be representative of the area that includes the air quality station and therefore can be used to interpret the sources of particulate matter measured by the Partisol.   |
| 2099 | Table 5.2-5                         | Air                            | BC ENV (Breanne Hill)       | Oct 07, 2022 | 2 | Follow Up | Information Requirement | Can you please ask BWG to explain why the dust collectors for the fusion furnace diesel exhaust and the Lime Silo dust collector are predicted to be 30.8 mg/m <sup>3</sup> and 55.0 mg/m <sup>3</sup> when the other dust collectors all have emissions around 13.8 mg/m <sup>3</sup>  | The efficiency of lime silo scrubber is related to parameters - e.g. particle size distribution of the material, inlet dust loading. Once the scrubber is set up during commissioning, the scrubber will have an efficiency of up to 80% at optimal slaking operating conditions. 55.0 mg/m <sup>3</sup> was selected as a conservative estimate, we expect emissions to be lower. To provide an update on what was presented for air emissions predictions, an update has been made to the design of the process plant since that there will be no propane fusion furnace, it will be an electric induction furnace, essentially no particulate emissions. Additionally, as an update:<br><br><b>Equipment Originally Now</b><br>Smelting furnace Propane Electric induction<br>Strip solution heat Propane Electric<br>Carbon Regen. Kbin Propane Electric<br>Building heaters Diesel/Propane Electric |
| 2100 | -                                   | Air                            | BC ENV (Breanne Hill)       | Jul 22, 2022 | 1 | New       | Information Requirement | When particulate matter data is collected it is generally collected at or near a meteorological station. Please explain the rationale for not having the meteorological and particulate matter sampling units in the same location and how the meteorological data will be used when interpreting the particulate matter data.  | The Blackwater High meteorological station is located approximately 2 km from the air quality station at the workers camp. The area has limited topographic relief therefore it is anticipated that meteorological conditions at the met station will be representative of the area that includes the air quality station and therefore can be used to interpret the sources of particulate matter measured by the Partisol.<br><br>The TARP presented in Table 9.1-1 is always in effect and responses will be made when triggers are exceeded.   |
| 1967 | Fugitive Dust SOP Section 4         | AQDMP                          | LDN/UFN Emma Cooke          | Jun 02, 2022 | 1 | New       | No                      | They will conduct an inspection each day, at relevant sources listed in Table 3-1, during hot and dry weather. A hot and dry day is defined as having a daytime high greater than 20°C with less than 0.25 mm of precipitation in the preceding 24 hours. What about inspection frequency for periods that don't meet these thresholds?   | The inspections referenced in Section 4 of App D are only required during the conditions described, because during other periods natural dust suppression will be occurring.   |
| 1968 | Fugitive Dust SOP Section 5.3       | AQDMP                          | LDN/UFN Emma Cooke          | Jun 02, 2022 | 1 | New       | No                      | Minimize stockpile areas. Does this mean creating bigger stockpiles rather than many smaller ones? Please clarify how stockpiles can be minimized.  | It is important to minimize the surface area of the stockpiles to reduce fugitive dust generation by wind. This can be accomplished by controlling the height of the stockpiles and creating larger stockpiles rather than many small ones. The most efficient storage shape in terms of exposed surface area is a large pile versus many smaller piles, and that exposed surface area is a key driver of dust emissions from stockpiles   |
| 1969 | Fugitive Dust SOP Section 5.3       | AQDMP                          | LDN/UFN Emma Cooke          | Jun 02, 2022 | 1 | New       | No                      | Seed topsoil stockpiles to reduce erosion and invasive-species establishment Please clarify that only native seed mix will be used.   | BW Gold will add a caveat about only using native seed mix.  |
| 1969 | Fugitive Dust SOP Section 5.3       | AQDMP                          | LDN/UFN Emma Cooke          | Jun 02, 2022 | 2 | Follow Up | No                      | Please ensure comment is carried forward and revisions are included in the updated SOP.   | BW Gold recognizes that management plans may need various updates as a result of permitting reviews. BW Gold will track all edits and discuss with EMLI and other regulators the appropriate timing to submit updated plans. As appropriate, updated plans will also be filed with other relevant regulators and Indigenous groups.  |
| 1970 | Fugitive Dust SOP Section 6         | AQDMP                          | LDN/UFN Emma Cooke          | Jun 02, 2022 | 1 | New       | No                      | What is included in the daily visual inspection log?  | Thank you for your response. It is BW Gold's understanding that this comment is now considered resolved as it relates to the Application Review phase of the permitting process. BW Gold understands this comment will be carried forward by LDN/UFN for use in post-permitting processes involving review of revised management plans.  |
| 1971 | Fugitive Dust SOP Section 5.1.1     | AQDMP                          | LDN/UFN Mikayla Davis       | Jun 06, 2022 | 1 | New       | No                      | Watering shall be controlled so there is no overland water flow. What mechanism will be used to control overland water flow?  | This log will include a description of all visual inspections or observations related to dust plumes from operations.  |
| 1972 | Fugitive Dust SOP Table 2-1         | AQDMP                          | LDN/UFN Mikayla Davis       | Jun 06, 2022 | 1 | New       | No                      | What qualifications will the "supervisors" have to assess dust management procedures?   | When used appropriately, there are limited effects of using calcium chloride. Calcium chloride is a common substance used to control fugitive dust. BW Gold will follow guidance from the BC best practice manual on fugitive dust management ( <a href="https://www2.gov.bc.ca/assets/gov/environment/waste-management/industrial-waste/industrial-waste/mining-smelt-energy/guidance-documents/dust_management_plan_guidance.pdf">https://www2.gov.bc.ca/assets/gov/environment/waste-management/industrial-waste/industrial-waste/mining-smelt-energy/guidance-documents/dust_management_plan_guidance.pdf</a> ), which refers to the best management practice manual from the NWT. ( <a href="https://www.enr.gov.nt.ca/sites/enr/files/Guidelines/dust-suppression.pdf">https://www.enr.gov.nt.ca/sites/enr/files/Guidelines/dust-suppression.pdf</a> ).  |
| 1973 | Fugitive Dust SOP Section 5.1.1     | AQDMP                          | LDN/UFN Mikayla Davis       | Jun 06, 2022 | 1 | New       | No                      | Who will assess if notable surface run-off is occurring? What actions will be undertaken if notable surface run-off occurs before watering is stopped?  | The application rate of dust suppressant will be carefully monitored to ensure adequate coverage without pooling or runoff of products. The amount of dust suppressant applied will not exceed the minimum amount required to effectively suppress dust. Dust suppressant will be bladed or incorporated into the road immediately upon application, to ensure the product does not migrate off the roadway. There will be no evidence of excess product on the roadway. The dust suppressant will not migrate or run off the traveled portion of the roadway.   |
| 1974 | Fugitive Dust SOP Section 5.1.1     | AQDMP                          | LDN/UFN Mikayla Davis       | Jun 06, 2022 | 1 | New       | No                      | Where will "clean water" be sourced from?   | BW Gold will revise the plan to indicate this change.  |
| 1975 | Fugitive Dust SOP Section 5.1.1     | AQDMP                          | LDN/UFN Mikayla Davis       | Jun 06, 2022 | 1 | New       | No                      | What are the environmental implications of using calcium chloride for dust suppression? how will these be monitored (assuming chemical dust suppression is used), and who will conduct the monitoring?  | BW Gold recognizes that management plans may need various updates as a result of permitting reviews. BW Gold will track all edits and discuss with EMLI and other regulators the appropriate timing to submit updated plans. As appropriate, updated plans will also be filed with other relevant regulators and Indigenous groups.  |

|      |                                 |   |                      |              |           |   |  |   |   |
|------|---------------------------------|---|----------------------|--------------|-----------|---|--|---|---|
| 1975 | Fugitive Dust SOP Section 5.1.1 | LDN/UFN Mikayla Davis   | Jul 22, 2022         | 2            | Follow-up | Unresolved until we receive an updated SOP for review (carry forward). Additionally, what mitigation measures will be in place if chemical dust suppression is used and heavy precipitation occurs? Please include that areas that are prone to flooding will not have calcium chloride applied. Please respond to original comment on when conducting this monitoring. | Areas that are prone to flooding will not have calcium chloride applied (AQMP will be updated to include this disclaimer). The Environmental Manager or their designate will be in charge of monitoring. Calcium chloride will not be applied if precipitation is occurring, or forecast to occur before the product sets or cures. Areas that are prone to flooding will not have calcium chloride applied. |   |   |
| 1976 | Fugitive Dust SOP Section 5.1.2 | LDN/UFN Mikayla Davis   | Jun 06, 2022         | 1            | New       | What are the general speed limits during normal activities vs during periods of higher fugitive dust emissions?   | Speed limits will be established based on road design class, with the maximum speed limit of 50 km/h on all project roads. Supervisors will determine the level of speed limit restrictions based on conditions at site.   |   |   |
| 1976 | Fugitive Dust SOP Section 5.1.2 | LDN/UFN Mikayla Davis   | Jul 22, 2022         | 2            | Follow-up | Where can road design class information as it relates to speed limits be found?   | Mine site traffic control plan has this required information. Appendix 9-K Section 4.2, Section 7.2, Table 7.6-1   |   |   |
| 1977 | Fugitive Dust SOP Section 5.1.3 | LDN/UFN Mikayla Davis   | Jun 06, 2022         | 1            | New       | Where will coarse aggregate be sourced from?  | Coarse aggregate will be sourced from the borrow area during construction and NAG rock from the pit during operations.   |   |   |
| 1978 | Fugitive Dust SOP Section 5.2   | LDN/UFN Mikayla Davis   | Jun 06, 2022         | 1            | New       | What are the criteria for weather conditions that would postpone blasting events?   | Where dust or fume impacts on employees and environment cannot be avoided, blasting must be postponed until wind direction does not disperse emissions towards employees or local sensitive receptors. The Drill and Blast Superintendent and Mine manager will ultimately decide when to postpone blasting (the EM and Health and Safety can inform this decision).   |   |   |
| 1979 | Fugitive Dust SOP Section 7     | LDN/UFN Mikayla Davis   | Jun 06, 2022         | 1            | New       | Who is the health and safety representative and mine manager? Please add their signatures.  | The health and safety representative and mine manager will be signing once through application review and the plans are being finalized for implementation.  |   |   |
| 1979 | Fugitive Dust SOP Section 7     | LDN/UFN Mikayla Davis   | Jul 22, 2022         | 2            | Follow-up | Unresolved, until we are provided with an updated SOP for review. (Carry forward)   | Thank you for your response. It is BW Gold's understanding that this comment is now considered resolved as it relates to the Application Review phase of the permitting process. BW Gold understands this comment will be carried forward by LDN/UFN for use in post-permitting processes involving review of revised management plans.  |   |   |
| 1    | Air Quality & DMP General       | Editorial/Grammar   | RWDI (Jeff Lundgren) | Sep 10, 2021 | 1         | New   | The document itself could potentially be edited to improve readability and provide a little more context.<br>The bulleted list does not mention NO2, SO2 and PM2.5.  | Based on reviewer comments the document has been updated to improve readability and provide more context.<br>PM2.5 is a component of dust so does not need to be explicitly listed. The purpose and scope of the plan has been revised as follows: "The purpose of the Air Quality and Fugitive Dust Management Plan (AQMP) is to minimize the effects of the Project's air emissions on human health and the natural environment. The plan identifies dust-emitting sources, dust mitigation measures, and contingency measures in the event that primary control measures are not effectively controlling dust emissions."<br>The sentence has been revised as follows: "The EM or designate will be responsible for reporting non-compliance to the CM, EPCM contractor..."  |   |
| 2    | Air Quality & DMP 2-1           | Purpose and Objective   | RWDI (Jeff Lundgren) | Sep 10, 2021 | 1         | New   |  | PM2.5 is a component of dust so does not need to be explicitly listed. The purpose and scope of the plan has been revised as follows: "The purpose of the Air Quality and Fugitive Dust Management Plan (AQMP) is to minimize the effects of the Project's air emissions on human health and the natural environment. The plan identifies dust-emitting sources, dust mitigation measures, and contingency measures in the event that primary control measures are not effectively controlling dust emissions."<br>The sentence has been revised as follows: "The EM or designate will be responsible for reporting non-compliance to the CM, EPCM contractor..."   |   |
| 3    | Air Quality & DMP 3-2           | Editorial/Grammar   | RWDI (Jeff Lundgren) | Sep 10, 2021 | 1         | New   |  | Passage: "The EM or designate will be responsible for reporting non-compliance to the CM, and EPCM contractor. Reviewer commented "superfluous and?"<br>The document could include wind roses here to help the reader visualize. Also, these may change over time, so I presume values given here will be updated as the plan and document evolves.   |   |
| 4    | Air Quality & DMP 4-1           | Environment at Setting  | RWDI (Jeff Lundgren) | Sep 10, 2021 | 1         | New   |  | The arrangement in earlier years will be more relevant to the implementation and evolution of the plan. Will it differ notably from Y+23? Will that influence (or not) the plan actions in the initial years?   | The size and presence of certain project components will change over time but the use of year +23 allows all planned project components to be included in the AQMP. Using the Year +23 General Arrangement will not influence how mitigations or how actions are implemented in the earlier years of the Project.                                     |
| 5    | Air Quality & DMP 4-1           | Facility and Process Description  | RWDI (Jeff Lundgren) | Sep 10, 2021 | 1         | New   |  | Passage: "BW Gold has integrated engineering controls to mitigate fugitive dust emissions from the processing plant, which include (Ausenco 2021)." Reviewer commented "This sentence fragmented from opening of bullet list?"  | The sentence has been revised as follows: "BW Gold has integrated engineering controls to mitigate fugitive dust emissions from the processing plant, which includes active dust collection, wet grinding, enclosures, and stack emissions (Ausenco 2021)." These controls are outlined below."   |
| 6    | Air Quality & DMP 4-1           | Editorial/Grammar   | RWDI (Jeff Lundgren) | Sep 10, 2021 | 1         | New   |  | Last sentence on page seems fragmented, stops after "which include". Perhaps should read "BW Gold has integrated engineering controls to mitigate fugitive dust emissions from the processing plant (Ausenco 2021), which are outlined in the following sections."<br>(1) In the first sentence in section 4.3.3, should the word "potentially" just be "potential"? Using the adverb makes it apply to the verb "store", not the noun phrase "acid generating waste". That is, do you mean to say that you might store the acid waste, or you mean you will store waste that might generate acid. If the latter (as I expect) its just "potential". (2) The text here also states: "Construction of TSF will commence in Y-2 with the diversion of Davidson Creek and construction of TSF C diversion berm, downstream sediment control pond and the Interim Environmental Control Dam." Is this "dam construction" (emphasis mine) listed under "operations" rather than "construction" in Table 6.1. If so, perhaps make that explicit here. | See response to Comment #6<br><br>(1) The word "potentially" is correct as it comes from the term "potentially acid generating" (PAG) rock. (2) Table 6-1 has been revised as follows: Construction: "Construction of TSF dams, interim environmental control dam" Operations: "Construction of TSF Main Dam, Darn Interim environmental control dam" |
| 7    | Air Quality & DMP 4-1           | Facility and Process Description  | RWDI (Jeff Lundgren) | Sep 10, 2021 | 1         | New   |  | Will topsoil stockpiles be seeded if being stored unperturbed for longer periods of time (say more than a year)? Table 6.2 has the additional comment "Until stockpiles are vegetated alongside soil stockpiles, so I presume this is the case? If so, should note here also.   | The following statement has been included: "Stockpiles will be seeded with non-propagating grass species, native grasses and forbs, and tree and shrub species to reduce erosion and invasive-species establishment." A timeframe has not been included because all topsoil stockpiles will be seeded.  |
| 8    | Air Quality & DMP 4-6           | Tailings Storage Facility   | RWDI (Jeff Lundgren) | Sep 10, 2021 | 1         | New   |  | This section could use just a little more detail to place results in context. Which project phase is represented in the results? Construction or Operations? If Operations, for what year from life of mine?  | This has been updated to indicate that the modelling was conducted for Phase 1 of operations.   |
| 9    | Air Quality & DMP 4-7           | Stockpiles - Topsoil  | RWDI (Jeff Lundgren) | Sep 10, 2021 | 1         | New   |  | Also, a brief mention of modelling protocol would also help with context. It need only be something like "Modelling results represent a level 2 assessment conducted with the CALPUFF/AERMOD/OTHER regulatory over x number years from 20xx to 20xx."   | New subsection added to indicate the level of modelling that was conducted and the years of modeling.   |
| 10   | Air Quality & DMP 5-1           | Air Dispersion Modelling Results  | RWDI (Jeff Lundgren) | Sep 10, 2021 | 1         | New   |  | Also, this section is a specific example of the general comment given above relating to the document structure. NO2, SO2 and CO results are presented but neither sources or emissions of these CPDCs have been discussed to this point.  | Dispersion modelling results presented in 7.2.  |
| 11   | Air Quality & DMP 5-1           | Air Dispersion Modelling Results  | RWDI (Jeff Lundgren) | Sep 10, 2021 | 1         | New   |  | Similarly, only "dust" - i.e., total PM - has been addressed. No mention of PM fractions or source that result in PM2.5, PM10 has yet been presented. Also perhaps make explicit reference that PM2.5 and PM10 are included because (as you note above) ENW recommends monitoring the fractional PM species rather than dust deposition.  | Dispersion modelling results presented in 7.2.  |
| 12   | Air Quality & DMP 5-1           | Air Dispersion Modelling Results  | RWDI (Jeff Lundgren) | Sep 10, 2021 | 1         | New   |  | This is the main specific example of the general comment regarding the structure of the document. The content presented here is good. But I think it would be helpful to come earlier in the document. For example, by necessity emission sources must be identified and characterized in order to be able to conduct air quality dispersion modelling. Thus, it would, by extension, make sense that emissions sources are detailed prior to modelling results. Similarly, the specific information presented in section 4 might be better placed after the general summary provided here.   | The plan has been restructured so air dispersion modelling and effects are presented in 7.2.  |
| 13   | Air Quality & DMP 5-1           | Air Dispersion Modelling Results  | RWDI (Jeff Lundgren) | Sep 10, 2021 | 1         | New   |  | See comment above regarding why "construction" listed under "Operations" Phase. Perhaps just note that phases are temporally based periods, and that "construction" activities can still occur while the mine is in "operations"  | Table 6-1 has been updated to include the planned construction activities during the Operations phase consistent with the Development Schedule in Chapter 3 of the Application.   |
| 14   | Air Quality & DMP 6-1           | Identification of Potential Air Emission Sources  | RWDI (Jeff Lundgren) | Sep 10, 2021 | 1         | New   |  | As noted earlier, section 4.2.4 does not mention that soil stockpiles will be vegetated as is noted in table.   | See response to Comment #9  |
| 15   | Air Quality & DMP 6-1           | Activities Resulting in Fugitive Dust by Project Phase  | RWDI (Jeff Lundgren) | Sep 10, 2021 | 1         | New   |  | Which Phase do these emissions reference? Presumably Operations?  | The title has been revised as follows: "Operations Emission Sources and Predicted Emissions"  |
| 16   | Air Quality & DMP 6-3/4         | Fugitive Dust Emission Sources by Project Component   | RWDI (Jeff Lundgren) | Sep 10, 2021 | 1         | New   |  | Presentation of the objective should be earlier. In particular, if these are shown prior to the dispersion model results in Section 5, then the reader is better able to grasp that model results are indeed well below the objectives that have already been introduced.   | The presentation of the modelling results have been moved so that the objectives are presented before the modelling results.  |
| 17   | Air Quality & DMP 6-4           | Emission Sources and Predicted Emissions  | RWDI (Jeff Lundgren) | Sep 10, 2021 | 1         | New   |  | Passage: "It should be noted that naturally occurring small particulates produced by forest fires elevate PM 2.5 and PM 10 levels above regulatory standards." Reviewer commented "True, but awkwardly worded..."   | The sentence has been revised as follows: "Naturally occurring small particulates produced by forest fires can elevate PM2.5 and PM10 levels above guidelines."   |
| 18   | Air Quality & DMP 7-1           | Federal and BC Ambient Air Quality Objectives   | RWDI (Jeff Lundgren) | Sep 10, 2021 | 1         | New   |  | Under soil stockpiles, vegetation is not mentioned, but is noted in Table 6.1 [6.2]   | The following bullet has been added to the topsoil stockpile mitigations: "Stockpiles will be seeded to reduce erosion and establishment of invasive species."  |
| 19   | Air Quality & DMP 7-4           | Editorial/Grammar   | RWDI (Jeff Lundgren) | Sep 10, 2021 | 1         | New   |  | Passage: "Wind onsite, which can cause fugitive dust events, comes predominantly from the west." Reviewer commented "annual reports? Specific dust generating events?"  | The sentence has been revised as follows: "Prevailing winds have historically been observed to come from the west (see Section 5.2), which can cause fugitive dust events."   |
| 20   | Air Quality & DMP 8-1/2/3       | Table 8.2-1: Air Quality Mitigation Measures, Best Management Practices, and Contingency Measures | RWDI (Jeff Lundgren) | Sep 10, 2021 | 1         | New   |  | Passage: "CO levels are below BC air quality objectives at the human receptor locations." Reviewer commented "perhaps note that they are "well" below objectives i.e. <<5%"   | This statement has been revised as follows: "Based on monitoring results, CO monitoring is not recommended as CO levels are below BC air quality objectives at the human receptor locations (i.e., less than 5% of the objectives)."  |
| 21   | Air Quality & DMP 8-4           | Meteorologic al Stations  | RWDI (Jeff Lundgren) | Sep 10, 2021 | 1         | New   |  | Passage: "In the event that the limits in the air discharge permit are exceeded [...] Reviewer commented "in the [redacted] air discharge permit (above it noted that BW has not yet received a discharge permit). Perhaps note that this will be made specific in future versions when actual permit levels are in place."   | The statement has been revised as follows: "In the event that COPC limits and corresponding concentration triggers identified in Section 4.4 (Adaptive Management Trigger Action Response) of the AQMP are exceeded, BW Gold will notify the EAO, ENV, EMA, Northern Health and Aboriginal Groups and Independent Environmental Monitor."             |
| 22   | Air Quality & DMP 8-6           | Carbon Monoxide   | RWDI (Jeff Lundgren) | Sep 10, 2021 | 1         | New   |  | Bullet: "Meteorological station." Reviewer commented "meteorological stations?"   | The bullet point has been changed to "Meteorological stations."   |
| 23   | Air Quality & DMP 8-7           | Editorial/Grammar   | RWDI (Jeff Lundgren) | Sep 10, 2021 | 1         | New   |  | Passage: "If based on the review, new sources are introduced [...] Reviewer commented "needs comma - if, based on the review"   | The sentence has been revised as follows: "Appropriate sections of the AQMP will be updated if the review concludes there are new emission sources, existing emission sources have been eliminated, or emissions are significantly reduced."  |
| 24   | Air Quality & DMP 9-2           | Editorial/Grammar   | RWDI (Jeff Lundgren) | Sep 10, 2021 | 1         | New   |  | It's not clear in this section how, specifically, this plan (or the data collected from this plan) will inform the Country Foods Monitoring Plan (CFMP) or the Wildlife Management and Monitoring Plan (WMMMP). When will metals monitoring and analysis be completed and/or triggered? Please describe.  | Metals monitoring in dustfall is not included in the AQMP as it is not a recognized method of measurement by ENV. Metals monitoring will be conducted as part of the CFMP and is described in that document. The results will be used to inform the Wildlife Mitigation and Monitoring Plan (WMMMP).  |
| 25   | Air Quality & DMP 10-1          | Editorial/Grammar   | RWDI (Jeff Lundgren) | Sep 10, 2021 | 1         | New   |  | There is a land location for the incinerator provided in the plan, but it would be helpful to show the location of the incinerator on the site map and also where it is located in relation to the camp? How often will the incinerator be operating and will the PM2.5 monitoring (every 3 or 6 days?, less during the winter) capture days when the incinerator is operating? Please elaborate.   | Incinerator has been added to Figure 7-1.<br>Frequency of incinerator operation<br>Yes, the PM2.5 monitoring will be on a regular schedule and as such is likely to capture days that the incinerator is operating.   |

|    |  |   |                             |              |   |     |   |  |   |
|----|--|---|-----------------------------|--------------|---|-----|---|--|---|
| 28 | A.1 Air Quality and Fugitive Dust Management Plan 6-1          | 6. Identification of Potential Air Emission Sources – Diesel generators | Northern Health (Paula Tat) | Nov 10, 2021 | 1 | New |   | Where will the 6 diesel generators be located? Will any be close to the camp? Will the PM2.5 monitoring days coincide with days when the generators are operating? Are the emissions from the generators captured in table 6-3 under "Fired sources"?  | The diesel generators are only backup generators and are only to be used in rare circumstances when line power is unavailable. As these generators are only planned to be used as backups it is not known if PM monitoring will occur on days when the generators are running. The location of the generators will be added to Figure 5.3-1. Emissions from the generators are included in Table 6-3 under "Fired Sources".   |
| 29 | A.1 Air Quality and Fugitive Dust Management Plan 7-1          | 7. Identification of Potential Effects of Fugitive Dust                 | Northern Health (Paula Tat) | Nov 10, 2021 | 1 | New |   | Thank you for including: "As even low levels of air pollution can affect some individuals, air quality objectives should not be viewed as levels that can be "polluted up to", but levels to stay well below." We support that all emissions should be kept as low as reasonable achievable.   | Noted. BW Gold understands that there is no further action.   |
| 30 | A.1 Air Quality and Fugitive Dust Management Plan 8-6          | 8.3.3 Particulate Matter Monitoring                                     | Northern Health (Paula Tat) | Nov 10, 2021 | 1 | New |   | "Fine particulate sampling will occur every third day, alternating between PM2.5 and PM10, between May and October. During winter conditions, sampling frequency will be weekly."  | No comment.   |
| 31 | A.1 Air Quality and Fugitive Dust Management Plan 8-6          | 8.3.3 Particulate Matter Monitoring                                     | Northern Health (Paula Tat) | Nov 10, 2021 | 1 | New |   | Does this mean that PM2.5 will be monitored every 6 days and PM10 will be monitored every 6 days? Will these pollutants be monitored every 2 weeks, respectively, during the winter? This is not clear in the plan – please clarify. Will this monitoring frequency capture worst-case scenario conditions? For example, will monitoring for PM2.5 every 6 days pick up days when the incinerator is running, diesel generators are running and this coincides with high traffic/dusty days? The monitoring program should validate the model and human health risk assessment predictions on the worst-case scenario days. What would trigger particulate matter metals analysis? We recommend that a full suite of metals analyses is completed (at least initially and then scaled up/down depending on results) to validate that model assumptions and outputs were conservative/protective of public health.  | Between May and October PM2.5 will be monitored every 6 days and PM10 will be monitored every 6 days. Between November and April the sampling interval of each parameter will be extended to once every 13 days. The sampling intervals during summer (likely to have the highest fugitive dust emissions) follow the 6 day frequency of the Federal National Air Pollution Surveillance (NAPS) program which is designed to capture representative ambient concentrations of criteria contaminants during all emissions scenarios. Particulate samplers cannot be used to measure metals concentrations in PM10 and PM2.5. Metals concentrations in soil and plants will be measured as part of the CFMP and can be used to validate that modelling results were conservative with respect to public health. |
| 32 | A.1 Air Quality and Fugitive Dust Management Plan 8-7          | 8.5.1 Notification  | Northern Health (Paula Tat) | Nov 10, 2021 | 1 | New |   | NH appreciates being notified when air quality exceedances occur. We also appreciate the plain language summary of the technical report since our time/capacities are limited. Any potential effects on human health should be clearly stated in the notification. Please include resource development/other health risks for these notifications. We support the staged approach to trigger action response.  | Noted. BW Gold understands that there is no further action.   |
| 33 | A.1 Air Quality and Fugitive Dust Management Plan 8-9          | Table 8.4-1 Trigger Action Response                                     | Northern Health (Paula Tat) | Nov 10, 2021 | 1 | New |   | There are not many details regarding when/where/how/who will complete the visual monitoring for dust in the plan. Is it everyone's responsibility to monitor and report on all dust events or are there specific roles assigned in specific locations during specific times? More detail seems appropriate/needed from an accountability lens.   | The Fugitive Dust Management SOP (Appendix D) provides details on roles and responsibilities with respect to visual dust monitoring. Supervisors, including the Construction, Blasting, and Production Supervisors, will hold primary responsibility for active fugitive dust monitoring and for initiating an appropriate response in accordance with the SOP.   |
| 34 | A.1 Air Quality and Fugitive Dust Management Plan 8-9          | Table 8.4-1 Trigger Action Response                                     | Northern Health (Paula Tat) | Nov 10, 2021 | 1 | New |   | Regarding the "Fine PM" monitoring program – How is the baseline concentration being established? Will that monitoring frequency be ramped up as described in this table. When would metals monitoring and analysis be triggered? We recommend that some initial investigation regarding metals concentrations is completed and then the frequency can be adjusted based on initial monitored results.   | The baseline concentration was determined as part of the EA process and described in Table 7-2.1. Metals monitoring will be conducted as part of the CFMP and is described in that plan.  |
| 35 | A.1 Air Quality and Fugitive Dust Management Plan 8-9          | Table 8.4-1 Trigger Action Response                                     | Northern Health (Paula Tat) | Nov 10, 2021 | 1 | New |   | If any particulate matter annual objectives/standards are exceeded, what actions are triggered?  | As stated in Table 9-1, if annual objectives for fine particulate matter are exceeded then BW Gold will develop causal analysis and associated mitigations in addition to a schedule for implementation. Increase sampling frequency to daily. The reports will be available to NH on request.  |
| 36 | A.1 Air Quality and Fugitive Dust Management Plan 8-9          | Table 8.4-1 Trigger Action Response                                     | Northern Health (Paula Tat) | Nov 10, 2021 | 1 | New |   | Will these annual reports be available to NH upon request? NH capacity is limited, but access to reports upon request will help us if community concerns are raised.   | The reports will be available to NH on request.   |
| 37 | A.1 Air Quality and Fugitive Dust Management Plan 9-1          | 9. Reporting and Record Keeping   | Northern Health (Paula Tat) | Nov 10, 2021 | 1 | New |   | Does "D" in the first sentence stand for Decision? How do these conditions differ from what is provided in Appendix B of the plan? Should these conditions be described in this plan?  | "DS" refers to the Project's federal Decision Statement. This is first defined in Section 1 and included in the Acronyms and Abbreviations section.   |
| 38 | A.1 Air Quality and Fugitive Dust Management Plan 9-1          | 9.1.2 Federal Decision Statement Annual Reporting                       | Northern Health (Paula Tat) | Nov 10, 2021 | 1 | New |   | Who participates with the "Blackwater Environment Committee"? Can NH be notified regarding revisions to the plan and provide feedback depending on capacity?   | There are a number of conditions in the DS that require annual reporting and are applicable to a number of plans or programs required under the DS. Section 10.1.2 (Decision Statement Annual Reporting) describes how BW Gold will achieve compliance with these conditions as they relate to the AQDMP. For consistency with other Project management plans, the relevant conditions will be added to the concordance table (Appendix B) in a future version of the plan.   |
| 39 | A.1 Air Quality and Fugitive Dust Management Plan 11-1         |   | Northern Health (Paula Tat) | Nov 10, 2021 | 1 | New |   | Section 4.3.7 in the August 2021 version of the AQDMP locates the refuse incinerator at 53.178570 N and 124.83570 W, while section 5.3.3 of the November 2021 AQDMP locates the incinerator at 53.1923 N and 124.81354 W. Which of the two coordinates represent the accurate location?  | Pursuant to Condition 19 of the Project's EAC #M19-01, BW Gold has established an Environmental Monitoring Committee (EMC) to facilitate information sharing and provide advice on the development and operation of the Project, and the implementation of EAC conditions, in a coordinated and collaborative manner. Committee members include representatives of the Environmental Assessment Office (EAO), UFN, LDN, NWFN, SFSN, SFN, NFN, Ministry of Energy, Mines and Low Carbon Innovation (EMLI), ENV and Ministry of Forests, Lands, Natural Resource Operations and Rural Development (FLNRDOR).<br>Revised draft and final versions of the AQDMP will be provided to Northern Health.  |
| 40 | C.1 Air Quality and Fugitive Dust Management Plan 5.3.7        | Refuse Incinerator  | Source (Pauline Mengote)    | Jan 31, 2022 | 1 | New | Refuse Incinerator                            | Section 4.3.7 in the August 2021 version of the AQDMP locates the refuse incinerator at 53.178570 N and 124.83570 W, while section 5.3.3 of the November 2021 AQDMP locates the incinerator at 53.1923 N and 124.81354 W. Which of the two coordinates represent the accurate location?<br>Clarification: Please clarify why the coordinates for the refuse incinerator differ between the August and November 2021 versions of the AQDMP and confirm whether the location under section 5.3.7 of the latest Plan is accurate. It would also be helpful to indicate the location of the incinerator on the site map in Figure 5.3-1.   | 53.1923 N and 124.81354 W are the correct coordinates. The location was updated due to revised information from the engineering team. The incinerator will be included on an updated site map.  |
| 41 | C.1 Air Quality and Fugitive Dust Management Plan 8.3.1        | Review of Monitored Meteorological Parameters                           | Source (Pauline Mengote)    | Jan 31, 2022 | 1 | New | Review of Monitored Meteorological Parameters | Section 8.3.1 states that two automated meteorological stations will collect data on meteorological parameters which will be reviewed monthly. It is unclear who will be responsible for reviewing this data and what the data will be reviewed for or against. Are there guidelines or standards for these parameters that cannot be exceeded? Are there particular values that are meant to be maintained?<br>Recommendation: Please specify under Section 8.3.1 who will be responsible for reviewing monthly meteorological data and clarify what the responsible party would be looking out for in their review of the data.<br>Section 8.3.1 states that two automated meteorological stations will collect data on meteorological parameters which will be reviewed monthly. It is unclear who will be responsible for reviewing this data and what the data will be reviewed for or against. Are there guidelines or standards for these parameters that cannot be exceeded? Are there particular values that are meant to be maintained?<br>Recommendation: Please specify under Section 8.3.1 who will be responsible for reviewing monthly meteorological data and clarify what the responsible party would be looking out for in their review of the data. | Section 8.3.1 has been updated to include review by BW Gold employees overseen by the Environmental Manager. There are no standards or guidelines to compare against, the review will be used to validate that the instrumentation is operating properly and recording measurements that are realistic in nature. The Water and Air Baseline Guidance Document for Mine Proponents and Operators (BC MOE 2016) will be used as guidance.  |
| 42 | C.1 Air Quality and Fugitive Dust Management Plan Table 8.2-1  | Dust Control During Transport of Loads                                  | Source (Pauline Mengote)    | Jan 31, 2022 | 1 | New | Dust Control During Transport of Loads        | The AQDMP does not specify control measures for dust that may arise from tailings or other loads that are in transit. Have dust practices been considered for transporting loads? Examples include the use of tackifiers or temporary physical coverings like tarps.<br>Recommendation: Please specify what control measures will be implemented to minimize the dispersion of dust from loads in transit. This could be included under Table 8.2-1.   | Table 8.2-1 was updated to include the use of tarps and tackifiers on fine material transported by open bed trucks.   |
| 43 | C.1 Air Quality and Fugitive Dust Management Plan 8.3.3        | Particulate Matter Monitoring   | Source (Pauline Mengote)    | Jan 31, 2022 | 1 | New | Particulate Matter Monitoring                 | Section 8.3.3 states that sampling of fine particulate matter will be conducted weekly. Will sampling alternate between PM2.5 and PM10 as is done between May and October (i.e., each parameter will be sampled every 2 weeks), or will both parameters be sampled every 7 days? This is unclear in the Plan.<br>Recommendation: Please clarify the sampling interval for particulate matter during the months of November to April – whether alternating between PM2.5 and PM10 or not.   | The wording in Section 8.3.3 is "Fine particulate sampling will occur every third day, alternating between PM2.5 and PM10, between May and October. During winter conditions, sampling frequency will be weekly." This has been updated to "Fine particulate sampling will occur every third day, alternating between PM2.5 and PM10, between May and October. During winter November to April conditions, sampling frequency will alternate between PM2.5 and PM10 will be on a weekly basis."   |
| 44 | C.1 Air Quality and Fugitive Dust Management Plan Figure 5.3-1 | Backup Diesel Generators  | Source (Pauline Mengote)    | Jan 31, 2022 | 1 | New | Backup Diesel Generators                      | It would be helpful to indicate the location of the diesel generators on the site map in Figure 5.3-1 as the planned location has not been discussed in the AQDMP. As the diesel generators are to be used only as backup power sources, how will emissions be monitored in the event that particulate matter monitoring does not occur on the days the generators are operating?<br>Is there a plan that exists to account for this scenario?<br>Recommendation: Please indicate in Figure 5.3-1 where the backup diesel generators will be located. Please also discuss what the monitoring plan is to ensure that emissions from the generators will be accounted for on days where PM monitoring does not coincide with operation of the generators.   | The emissions of PM from the backup diesel generators, in the rare and short term case they operate, are expected to be a small fraction of overall PM emissions at site and will therefore have a negligible impact on overall ambient PM concentrations. If the backup generators are required for longer periods the existing monitoring will be sufficient to assess their impact. The locations of the generators will be added to Figure 5.3-1.   |
| 45 | C.1 Air Quality and Fugitive Dust Management Plan Table 9.1    | Air Quality Trigger Response Framework                                  | Source (Pauline Mengote)    | Jan 31, 2022 | 1 | New | Air Quality Trigger Response Framework        | The AQDMP mentions that the management responses for elevated PM concentrations may include an analysis to determine the source of PM and specify appropriate corrective actions (section 9.3). It is unclear what this analysis entails.<br>Clarification: Please briefly describe what could be expected as part of the analysis to determine the cause of elevated PM concentrations.   | This analysis will involve determining the operational and/or meteorological conditions that were present during the elevated PM event and determining if operational changes should be implemented to limit emissions.   |
| 46 | C.1 Air Quality and Fugitive Dust Management Plan Table 9-1    | Management Response for Medium Level Triggers                           | Source (Pauline Mengote)    | Jan 31, 2022 | 1 | New | Management Response for Medium Level Triggers | The medium level response for fine PM as well as SO2 and NO2 include development of causal analysis, mitigations, and implementation schedules (Table 9-1). However, these mitigation measures will only be implemented at the high action level. Please clarify whether there is a particular reason these mitigation efforts cannot be implemented as part of the medium level management responses.<br>Clarification: Please provide a rationale as to why mitigation efforts are only carried out when air quality objectives are exceeded, as opposed to earlier on when it may be observed that PM/SO2/NO2 concentrations are trending toward these exceedances.   | The rationale for only implementing further mitigation at the high level, beyond what is already included in the AQDMP, is that the medium level trigger does not imply that there is a trend towards exceedance only that a singular event has occurred. If those events become worse and AQO are exceeded then there is an indication that existing mitigation needs to be augmented which why there is a trigger that exists for a high level response. It is not reasonable to increase mitigation at all response levels but only at those levels where it is determined that existing mitigation is insufficient to maintain ambient CAC concentrations below AAQO.   |
| 47 | C.1 Air Quality and Fugitive Dust Management Plan Section 8.4  | Typos   | Source (Pauline Mengote)    | Jan 31, 2022 | 1 | New | Typos   | Section 8.4 (Community Feedback Mechanism) reads: "In the event that COPC limits and corresponding concentration triggers identified in Section 8.4 (Adaptive Management Trigger Action Response) of the AQDMP are exceeded..." This is an incorrect reference. Please correct "section 8.4" to Section 9.   | This has been updated to reference Section 9 rather than Section 8.4  |

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| 48 | C.1 Air Quality and Fugitive Dust Management Plan | Condition #20 - General                       | EAO (Tracey Janes)       | Feb 15, 2022 | 1 | New | Condition #20 - General                       | <p>Implement the plan as provided. Revise in consultation with EMLI, ENV, NHA and Aboriginal Groups and in accordance with timelines in the Document Submission Plan.</p> <p>Deficiencies noted:</p> <ul style="list-style-type: none"> <li>Lacks evidence that plan was developed in consultation with Aboriginal groups</li> <li>Lacks reference to Condition 43 Mitigations Table 20 (a)</li> <li>Not clear how Holder will notify required parties if contaminant concentration triggers are exceeded (20 (h))</li> </ul>  | <p>See Appendix A Condition #4. Draft AQDMP provided to Aboriginal Groups in August 2021 for review and comment. While BW Gold sets general timeframes for review and comments via written notice, BW Gold and Aboriginal Groups engage in ongoing communication to establish flexible timeframes agreed to by all parties.</p> <p>Condition 43 Mitigations Table is not part of the joint MA/EMA and has been completed and submitted to the EAO separately as required.</p> <p>See Section 8.4. In the event that COC limits and corresponding concentration triggers identified in Section 8.49 (Adaptive Management Trigger Action Response) of the AQDMP are exceeded, BW Gold will notify the EAO, ENV, EMLI, Northern Health and Aboriginal Groups and Independent Environmental Monitor. As required by EAC Condition 20, the notification will include both a technical report and a plain language summary of the technical report. The report will be publicly posted to the Blackwater Project website.</p> |
| 49 | C.1 Air Quality and Fugitive Dust Management Plan | Quality Control - Dustfall Metals Sampling    | Source (Pauline Mengote) | Feb 23, 2022 | 1 | New | Quality Control - Dustfall Metals Sampling    | <p>Section 8.3.6 mentions the QA/QC program will include "duplicate dustfall metals samples collected at each dust fall monitoring site," however there is no discussion of what level of reproducibility is acceptable with the duplicate samples. Typically, when samples are run in duplicate, the Relative Percent Difference (RPD) is calculated and results are deemed acceptable if the RPD is less than 20 percent.</p> <p>Clarification: Please discuss what level of reproducibility will be accepted to determine whether sampling results are acceptable.</p>  | <p>The accepted level will be when RPD is less than 20 percent</p>  |
| 50 | C.1 Air Quality and Fugitive Dust Management Plan | Fugitive Dust Inspections                     | Source (Pauline Mengote) | Feb 23, 2022 | 1 | New | Fugitive Dust Inspections                     | <p>Section 4 of Appendix D defines a hot and dry day "as having a daytime high greater than 20°C with less than 0.25 mm of precipitation in the preceding 24 hours." What about prolonged periods of no precipitation when the daytime temperature is less than 20°C? This seems like a restrictive definition of 'hot and dry'.</p>   | <p>This criteria does not imply that mitigation will only occur under "hot and dry" conditions only that inspections are triggered by these conditions. Section 5 of the appendix lists responses based on types of activities occurring. It is our opinion that 20°C is not an overly restrictive definition of "hot". If after annual review it is determined that this definition needs expanding the adaptive management framework will allow for that.</p>   |
| 51 | C.1 Air Quality and Fugitive Dust Management Plan | Review of Monitored Meteorological Parameters | Source (Pauline Mengote) | Feb 23, 2022 | 1 | New | Review of Monitored Meteorological Parameters | <p>Section 8.3.1 states that two automated meteorological stations will collect data on meteorological parameters that will be reviewed monthly. It is unclear who will be responsible for reviewing this data and what the data will be reviewed for or against. Are there guidelines or standards for these parameters that cannot be exceeded? Are there particular values that are meant to be maintained?</p> <p>Clarification: Please clarify who is the Qualified Professional that will be responsible for reviewing monthly meteorological data and what the responsible party would be looking out for in their review of the data.</p> <p>Further details on the qualifications and experience of the two authors of the Plan, mentioned in section 12, should be included. There must be enough information to determine that the authors have adequate training and experience to prepare an Air Quality and Dust Management Plan.</p>  | <p>As stated in the AQDMP: Data will be downloaded on a daily basis and reviewed by BW Gold employees overseen by the Environmental Manager at a minimum of a monthly basis. Data will be reviewed according to guidance in <i>Water and Air Baseline Guidance Document for Mine Proponents and Operators</i> (BC MOE 2016)</p>   |
| 52 | C.1 Air Quality and Fugitive Dust Management Plan | Qualified Professionals                       | Source (Pauline Mengote) | Feb 23, 2022 | 1 | New | Qualified Professionals                       | <p>Mr. Schmitt is a Technical Director at ERM with over 35 years of experience as a professional geoscientist in both the private and government sectors. His experience includes major mine projects, utility and energy permitting and environmental assessment, mine environmental and regulatory due diligence, mining regulation and policy, mineral exploration, project management, scoping through feasibility study support, and client relations. Mr. Schmitt manages a group of permitting specialists focused on major mining and energy project permitting, and actively undertakes environmental and regulatory due diligence projects. Project assignments have included mining jurisdictions across Canada, and internationally. Mr. Schmitt is a registered professional geoscientist EGBC, (No. 19824). He is a QP under the definition of NI 43-101.</p> <p>Mr. Soux is a Principal Consultant and has 19 years of experience in the fields of air quality and climatology. Mr. Soux is the Atmospheric Discipline Lead in ERM's Vancouver office. Mr. Soux's work has involved the air quality, GHG, and meteorology components of Environmental Assessments for a range of clients. Mr. Soux has also been involved in numerous modelling studies using the Weather Research and Forecasting meso-scale model and air dispersion modelling using CALPUFF and AERMOD. Mr. Soux has led many ambient air quality and meteorological monitoring installations and reviews and modelling studies both in Canada and internationally. Mr. Soux has also been a part of a number of due diligence projects and provided expertise subject to IFC and EPA regulations. He has a background as a climatologist studying the effects of the urban environment on local climate and monitoring the effects of climate change in Pacific North America.</p> <p>CVs of the two authors will be provided if required</p> |   |
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## BLACKWATER AIR QUALITY AND FUGITIVE DUST MANAGEMENT PLAN

### 1. AQFDMP

The following presents a summary of the primary changes made to the Air Quality and Fugitive Dust management.

Other editorial revisions (grammar, spelling) have not been included in this summary.

| Section                              | Revision   | Rationale  |
|--------------------------------------|--|--|
| 1.0 Purpose and Scope                | Added reference to Appendix D, TL AQDMP  | To include description of added appendix   |
| 1.2 Existing Permits                 | Updated text based on permit conditions  | Updating to reflect current information  |
| 1.3 Exclusions                       | Noted that Off-site infrastructure is excluded from the AQDMP  | Clarification  |
| 1.3 Related Documents                | Added note regarding CFMP and WMMP   | Referencing linkages between plans   |
| 2.0 Project Overview                 | Editorial revisions  | Consistency in introduction in all Blackwater management plans                           |
| 3.0 Roles and Responsibilities       | Editorial revisions  | Consistency in project roles and responsibilities across all Blackwater management plans |
| 4.0 Adaptive Management Framework    | Added "identify areas with potential air quality and dustfall impacts"   | Additional information   |
| 5.2 Environmental Setting            | Noted that the Project maintains two meteorological stations   | Revised based on current information   |
| 5.3 Facility and Process Description | Noted reference to Section 6 (Table 6-1)   | Identifying linkages in plan   |
| 5.3.2 Processing Plant               | Enclosures – removed stockpile cover<br>Removed Stack Emissions  | Updating information based on current information  |
| 5.3.3 Tailings Storage Facility      | Added "if and as required at the direction of the EoR"   | Clarification based on possible site scenarios   |
| 5.3.4 Stockpiles                     | Added "Final stockpiles will be seeded as surfaces are graded to final repose angles and become available for seeding" | Updating information   |

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| 6.0 Identification of Potential Air Emission Sources     | Removed stack and added final decommissioning as part of post-closure   | Updating information based on current information                   |
| 7.0 Identification of Potential Effects of Fugitive Dust | Added information based on the Permit and included additional information regarding monitoring.   | Updated as per comment #6 of the Joint MA/EMA ITT                   |
| 8.1 Training and Awareness                               | Added sentence regarding refresher training   | Clarification regarding frequency of training                       |
| 8.2 Mitigation Measures                                  | Added information regarding visual monitoring, blasting, height of low piles, and removed some text regarding spray water on low grade ore stockpiles<br>Added requirement to restrict speed and reduce idling for vehicles<br>Added additional footnotes in Table 8.2-1. | Updated as per comment #7 of the Joint MA/EMA ITT                   |
| 8.3.1 Meteorological Station                             | Added reference to Climate Station Operational and Quality Assurance Plan and revised Figure 8.3-1  | Updated as per comment #2091 and 9 of the Joint MA/EMA ITT          |
| 8.3.2 Dustfall Monitoring                                | Added note regarding outdated dustfall monitoring practices, recommended monitoring of particulates, and visual monitoring  | Updated as per comment #6 of the Joint MA/EMA ITT                   |
| 8.3.3 Particular Matter Monitoring                       | Added location of Partisol monitoring   | Additional information based on current monitoring stations at site |
| 8.3.4 Nitrogen Dioxide and Sulfur Dioxide Monitoring     | Added location of PASS monitoring   | Additional information based on current monitoring stations at site |
| 8.3.5 Carbon Monoxide                                    | Additional information regarding monitoring of CO   | Additional information based on current monitoring stations at site |
| 8.3.6 Point Source Discharge Monitoring                  | Added monitoring schedule and reference to permit   | Updated as per comment #13 of the Joint MA/EMA ITT                  |
| 9.1 Air Quality Trigger Response Framework               | Edited trigger action response plan table (Table 9.1-1)<br>Added note regarding passive sampling for SO <sub>2</sub> and NO <sub>2</sub>  | Updated as per comment #14 and 15 of the Joint MA/EMA ITT           |
| 9.2 Follow Up Program                                    | Added paragraph regarding an air quality follow up program to compare the results with predictions made in the EA. Noted frequency of follow-up program.  | Clarification regarding follow-up procedure and frequency of review |

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| 10.0 Reporting and Record Keeping                            | Editorial revisions   | Revising language                                    |
| 10.2 Emergency Reporting and Process Modification Procedures | Added entire section  | Updated as per comment #1570 of the Joint MA/EMA ITT |
| 11.0 Plan Revision   | Edited language   | Clarity in language                                  |
| 13.0 References  | Replaced outdated dates and references                                | Updated based on current information for consistency |
| Appendix D   | Added Transmission Line Air Quality and Fugitive Dust Management Plan | For reference  |

## 2. TL AQDFMP

The following presents a summary of the primary changes made to the Transmission Line Air Quality and Fugitive Dust management plan.

Other editorial revisions (grammar, spelling) have not been included in this summary.

| Section                       | Revision  | Rationale   |
|-------------------------------|---|---|
| Context Statement             | Removed reference to draft comments   | Document is in final format and revisions will be completed as per plan revision section. |
| Acronyms and Abbreviations    | Replaced reference to Environmental Monitoring Committee with Environmental Life of Mine Committee. | Update to reflect current activities  |
| 2. Roles and Responsibilities | Replaced EMC with ELoMC   | Update to reflect current activities  |
| 8.0 Adaptive Management       | Replaced plan revision text to reference EAC Condition 20 revisions process                         | TL plan is appended to EAC plan and will be revised on the same schedule                  |

The following presents a summary of the changes made since the Cultural and Spiritual Resources management plan was last updated. This table is current to the H.1 version of the plan.

| <b>Section</b>  | <b>Revision</b>   | <b>Reason</b>  |
|---|---|--|
| Acronyms and Abbreviations  | Changed text from 'Aboriginal Groups' to 'Indigenous Nations'<br>Updated abbreviations  | Use of appropriate language and updated terms  |
| 3.0 Roles and Responsibilities  | Editorial/ grammatical revisions<br>Replaced Aboriginal with Indigenous where appropriate.<br>Replaced FLNRORD with FOR   | Updated language to be consistent with other appropriate language and updated government departments   |
| 4.1.1 Heritage Conservation Act   | Added new bullet "Site alternation under Section 12.5 of the [...]"   | Updated as per comment #1780 of the Joint MA/EMA ITT   |
| 5.0 Adaptive Management Framework   | Updated word choice, 'protection' replaced the use of mitigation or prevention.   | Updated language for clarity   |
| 7.0 Baseline Heritage Resource Information  | Added that archaeological work was summarized as part of the baseline report for the EA   | Clarification  |
| Table 7.1-2: Known Archaeological Sites within 150 m of the Transmission Line Alignment Centerline                  | Revised table information   | Updated based on current information in the Transmission Line Construction Environmental Management Plan<br><br>Updated as per comment #1793 of the Joint MA/EMA ITT |
| 7.2 Known Cultural Heritage Resources   | Added reference about 1846 CMTs   | Updated as per comment #1784 of the Joint MA/EMA ITT   |
| Table 7.2-2: Historic Cultural Heritage Resources (CHRs) within 150 m of the Transmission Line Alignment Centreline | Revised table information   | Updated based on current information   |
| 7.3 Known Spiritual Sites   | Added 'or appropriate cultural protocols'   | Clarification  |
| 8.0 Protection Measures   | Added additional protection measures  | Providing more information regarding protection and mitigation to address adverse effects on heritage resources/values   |
| 8.1.1 Archaeological Sites  | Added more information regarding distances, mitigation measures and site alteration permits   | Updated as per comment #1786 of the Joint MA/EMA ITT   |
| 8.2 As-yet Unknown Sites  | Added information regarding prior and current archaeological impact assessments and approach for future revisions to the footprint (if applicable). Also added additional | Clarification  |

|   |  |  |
|---|--|--|
|   | information regarding information received from Indigenous Groups                                    |  |
| 9.0 Process for Identification of Cultural and Spiritual Areas of Importance                            | Changed 'practices' to 'appropriate cultural protocols'  | Language choice  |
| 10.2.1 Construction Monitoring  | Added additional text regarding indirect or direct impacts and distances                             | Updated as per comments #1789, 1800 and 1801 of the Joint MA/EMA ITT         |
| Appendix A - Concordance with EAC Certificate #M19-01   | Added new section regarding Indigenous Cultural Awareness and Recognition                            | Alignment with EAC Certificate   |
| Appendix D – Transmission Line Blackwater Archaeological and Cultural Heritage Resource Management Plan | Added the Transmission Line Blackwater Archaeological and Cultural Heritage Resource Management Plan | Per December 2022 communication with Transmission Line Mine Review Committee |

Appendix D – Transmission Line Blackwater Archaeological and Cultural Heritage Resource Management Plan had developed and approved though permitting the Transmission Line. The version attached to the CSMP is rev D.1., those changes made from the previous version are summarized in the table below:

| Section   | Revision  | Reason   |
|---|---|--|
| 1 Project Overview  | Added name for Carrier Sekani Tribal Council and added Metis Nation of BC.  | Updated to align with language and Federal Decision Statement engagement   |
| 7.1 Known Archaeological Sites within the Transmission Line | Added reference to Appendix E, 2023 preliminary field work.   | Addition of 2023 field work  |
| 7.1 Known Archaeological Sites within the Transmission Line | Updated temporary numbers with Borden Numbers received from Archaeology Branch and distance from transmission line centre; added site GaSF-14576-T1 | Updated as per comment #560 of the Transmission Line ITT. Addition of 2023 field work.   |
| 7.4 Known Paleontological Sites                             | Table number update   | Text correction  |
| 8.2.1 FhSE-43 and FKsf-35                                   | Grammatical text edits for clarity  | Updated language for clarity   |
| 8.2.2 Sites   | Updated heading to Borden Numbers and removed temporary numbers   | Updated as per comment #560 of the Transmission Line ITT   |
| 8.5 Paleontological Sites                                   | Text update to reference appropriate section (corrected to 7.4)   | Updated reference for clarity  |
| Appendix D  | Map update  | To reflect minor changes to the transmission line alignment that are currently being permitted and for which BW Gold has received letters of support from LDN, NWFN, SFN and StFN. |
| Appendix E  | 2023 preliminary fieldwork notes  | Addition of 2023 field work  |

## BLACKWATER INVASIVE PLANT MANAGEMENT PLAN

The following presents a summary of the primary changes made since the Invasive Plant management plan was last updated. This table is current to the D.1 version of the plan.

Other editorial revisions (grammar, spelling) have not been included in this summary.

| Section   | Revision  | Rationale  |
|---|---|--|
| 1.0 Project Overview                              | Editorial revisions   | Consistency in introduction in all Blackwater management plans   |
| 2.0 Purpose and Objectives                        | Editorial revisions   | Word choice for clarity  |
| 2.1 Controlling Invasive Plants and Noxious Weeds | Added more information about the how invasive plants outcomplete native vegetation. Also added more information about the CCCIPC document and EDRR species. | Updated as per comment #639, 641, 642 of the Joint MA/EMA ITT  |
| 2.3 Related Documents                             | Removed reference to Standard Operating Procedures  | These were provided in previous versions for permitting and review purposes. SOPs are subject to more frequent revisions than the management plan therefore has been decided to be independent from the management plan. |
| 3.0 Roles and Responsibilities                    | Editorial revisions   | Consistency in project roles and responsibilities across all Blackwater management plans   |
| 4.3 Existing Permits                              | Revisions to reflect M-246 permit conditions  | Updated based on current information   |
| 4.4 Guidelines and Best Management Practices      | Checked and updated references and guidelines   | Updated based on current information   |
| 6.0 Training and Awareness                        | Added more information regarding training awareness documentation and update cycle  | Updated as per comment #626, 635 of the Joint MA/EMA ITT   |
| 7.0 Baseline Invasive Plants Summary              | Referenced baseline studies completed from AMEC   | Updated as per comment #646 of the Joint MA/EMA ITT  |
| 8.0 Implementation                                | Added reference to Figure 7-1 (known invasive plant locations) and more information regarding methods of inadvertent introduction                           | Updated as per comment #649 of the Joint MA/EMA ITT  |
| 8.1 General Management Measures                   | Editorial revisions<br>Added additional measures including brushing of boots and importance of having clean boots   | Updated as per comment #620, 622 of the Joint MA/EMA ITT   |
| 8.2.1 Vehicle and Equipment Cleaning              | Added information regarding cleaning and washing in designated areas  | Updated as per comment #654, 663, 636, 656, 657 of the Joint MA/EMA ITT  |
| 8.2.2 Treatment and Control Measures              | Added information regarding treatment objectives, including Table 8.2-1   | Updated as per comment #625, 661 of the Joint MA/EMA ITT   |

|   |  |  |
|---|--|--|
| 8.2.2.2 Treatment Options                   | Added paragraph regarding LDN herbicide policy and implementation  | Updated as per comment #669, 665, of the Joint MA/EMA ITT  |
| 8.2.2.2 Mechanical Control                  | Added sentence regarding disposal methods  | Updated as per comment #627 of the Joint MA/EMA ITT  |
| 8.2.2.2 Cultural Control                    | New section  | Updated as per comment #630, 631 of the Joint MA/EMA ITT   |
| 8.2.2.2 Biological Control                  | Added note about consulting the CCCIPC and ISCBC for recommended biological treatment controls   | Updated as per comment #628 of the Joint MA/EMA ITT  |
| 8.2.2.2 Chemical Control                    | Removed and selectively re-integrated into the report as per LDN-UFN comment on herbicide policies   | Updated as per comment #630, 631, 770, 672, 675, 619, of the Joint MA/EMA ITT  |
| 9.0 Monitoring                              | Removed reference to Standard Operating Procedures   | These were provided in previous versions for permitting and review purposes. SOPs are subject to more frequent revisions than the management plan therefore has been decided to be independent from the management plan. |
| 9.0 Monitoring                              | Added additional information regarding monitoring and data collection  | Updated as per comment #634, 635 of the Joint MA/EMA ITT   |
| Table 9-1 Invasive Plant Monitoring Program | Added more information regarding exploration and mine access road. Revised other text for clarity  | Updated as per comment #679 of the Joint MA/EMA ITT  |
| 10.1.2 Annual Reclamation Report            | Revised and added more information regarding treatment how, where, when.   | Updated as per comment #648 of the Joint MA/EMA ITT  |
| 10.2 Record Keeping                         | Added references and sharing of key results with Indigenous Groups and the Blackwater Environmental Committee. Noted that changes to invasive species will be reported annually. | Updated as per comment #619, 632, 678, 677 of the Joint MA/EMA ITT   |
| 12.0 Plan Revision                          | Revised entire section   | Clarity in language  |
| 13.0 Qualified Registered Professionals     | Added "registered" to qualified professionals  | Revising language to be current with provincial nomenclature   |
| 14.0 References                             | Updated  | Updating based on current information  |

# BLACKWATER CONSTRUCTION ENVIRONMENTAL MANAGEMENT PLAN

## 1. CEMP

The following presents a summary of the primary changes made since the Construction Environmental Management Plan was last updated.. Editorial grammar and spelling revisions have not been included in this summary.

| Section   | Revision  | Rational  |
|---|---|---|
| Acronyms and Abbreviations  | Updating acronyms and abbreviations used<br>Replaced Environmental Management Committee with Environmental Life of Mine Committee (ELoMC)     | Updating based on current terminology and reporting standards           |
| 1.0 Project Overview  | Editorial revisions   | Consistency in introduction in all Blackwater management plans          |
| 2.0 Purpose and Objectives  | Editorial revisions   | Word choice for clarity<br>Updating attachment list                     |
| Table 2-1: Standard Operating Procedures Relevant to the Construction Environmental Management Plan | Updating list   | Updating based on current and available information and SOPs            |
| 3.0 Roles and Responsibilities  | Replaced Environmental Monitoring Committee with Environmental Life of Mine Committee<br>EMC replaced with ELoMC changed throughout document. | Pursuant to Condition 19 of the EAC #M19-01.                            |
| 4.1 Legislation and Regulations   | Updating formatting for bulleted list   | Editorial and formatting changes to clarify the order of regulations    |
| 4.3 Existing Permits  | Added current information regarding permit discharges and conditions  | Updated based on current information                                    |
| 4.5.1 Fish Habitat  | Update language to represent authorizations acquired<br>Update references to latest plans   | Updated based on current authorizations.                                |
| 4.5.1 Fish Habitat  | Removed Mid Mathews Pond 2  | Pond is not located in the Fish Habitat Offsetting plan.                |
| 4.5.3 Caribou   | Updated information about caribou offsetting  | Updated based on current information and offset commitments for caribou |

| <b>Section</b>  | <b>Revision</b>  | <b>Rational</b>   |
|---|--|---|
| 4.5.4 Bats  | Added more information regarding regulatory requests and requirements for bat offsetting (including roosts and other bat box structures)                       | Updated as per comment #1249 of the Joint MA/EMA ITT  |
| 6.0 Construction Schedule                                   | Revised language   | Updated timing based on M-246 Permit and EMA authorizations   |
| 7.0 Environmental Constraint Mapping                        | Removed 'maps at greater detail (e.g., 1:5,000) will be prepared to support site-specific CEMPs  | Map detail will be appropriate to the needs.  |
| Figure 7-1 and 7-2 Environmental Constraints Maps           | Updated maps   | Updating based on current information   |
| 8.0 Risk Management   | Use of the word qualified "registered" professionals   | Consistency in language/terminology used for qualified persons  |
| 9.1 General Measures Table 9.1-1                            | Removed 'Use a noise attenuating jacket around jackhammers'  | No jackhammers are used on site.  |
| 9.2 Site-specific Erosion and Sediment Control              | Providing additional information on class calculation and noting that some areas may require more intensive ESC measures                                       | Clarity   |
| 9.3.1 Sediment Control Ponds                                | Added additional information regarding SCP monitoring methods and parameters   | Additional information  |
| 9.7 Soil Management   | Removed line regarding development of a soil salvage SOP and added additional bullet points in section 9.7   | Avoiding duplication where soil mitigation measures have been captured in Table 9.7-1 and following paragraphs in Section 9.7<br><br>Updated as per comment #1256 of the Joint MA/EMA ITT |
| Table 9.8-1: Air Quality Mitigation and Management Measures | Added row for Concrete Batch Plants, TSF and Loads in Transit<br><br>Revised Aggregate Crushing and Screening Areas, Borrow Areas, Topsoil Stockpiles and MAR. | Consistency with other management plan updates, added clarity   |

| <b>Section</b>  | <b>Revision</b>   | <b>Rational</b>  |
|---|---|--|
| Table 9.9-1: Vegetation Mitigation and Management Measures                  | Under pre-clearing, added additional mitigation for transplantation of healthy trees. Revised post-clearing mitigations, clearing and construction activities, timing windows and updated herbicide policies  | Consistency with other management plan updates, added clarity<br><br>Updated as per comment #1244 of the Joint MA/EMA ITT                        |
| Table 9.9-3: Invasive Plant Mitigation and Management Measures              | Revised Treatment management measure  | Consistency with other management plan updates, added clarity and flexibility to use appropriate treatment measures based on the management plan |
| Table 9.10-1: Wetland Mitigation Measures                                   | Updated based on current and revised WMOP   | Consistency with other management plan updates, added clarity  |
| Table 9.11-1: Wildlife Mitigation and Management Measures                   | Revised bat, moose, and invertebrates section of table to include additional mitigation measures and references to management plans   | Consistency with other management plan updates, added clarity  |
| 9.11.2 Prevention Protocols   | Added 'prior to being deployed' to the chytridiomycosis prevention protocol and added 'truck and road-bout vehicles are exempt.'  | Add clarity to prevention protocol.  |
| 9.14-1: Archaeological, Heritage and Spiritual Resource Mitigation Measures | Added more information regarding known archaeological sites   | Consistency with other management plan updates, added clarity  |
| 10.0 Fuel Management and Spill Response Strategy                            | Updated reference and Transportation, and Storage and Inventory Control sections of Table 10-1  | Updating references with current information and consistency with other management plan updates  |
| 10.0 Fuel Management and Spill Response Strategy                            | Removed reference to 'Environmental Code of Practice for Metal Mines (EC 2009)  | Lack of relevance to site and includes contradictions to BC regulation.  |
| 10.3 Spill Response Equipment   | Updated spill equipment list  | Revised for relevancy  |
| 12.0 Project Orientation  | Added 'earthworks weekly meetings and management daily meetings'  | Updated to reflect activities on site.   |
| 13.0 Timing and Pre-construction Planning                                   | Added clarification on timing for furbearers and revised Table 13.1-1 for language  | Updated based on current information for consistency   |
| 14.1 Kickoff Meetings   | Added 'This is normally accomplished at the weekly earthworks meeting and any highlights often communicated through the daily management meeting.'<br><br>Added text 'through the submission of electronic safety shares' as a method that the Environmental Monitors will share information. | Updated to reflect activities on site.   |

| <b>Section</b>  | <b>Revision</b>  | <b>Rational</b>   |
|---|--|---|
| 14.2 Progress Meetings                                    | Added 'e.g., weekly earthworks meetings'<br>Removed 'Minutes of these meetings will be maintained by the BW Gold Construction Manager'   | Added for clarity<br>Meetings review action items and change reflects current activities.   |
| 14.3 Tailgate Meetings                                    | Added 'relevant BW Gold departmental supervisor'<br>Replaced Prime Contractor with 'each BW Gold department and each EPC contractor'<br>Added 'electronic safety shares and daily meetings are used to share key environmental information.'<br>Removed 'hold a Tailgate Meeting' in response to conditions  | Site EM would be unable to attend all site meetings across site. Changes reflect meeting ownership<br>Updated to represent current site activities.<br>Not feasible to hold tailgate meeting with each change in conditions |
| 15.3.1 Supervision By a Qualified Registered Professional | Replaced 'present to supervise' with 'remotely monitoring'<br>Added 'with data being provided to them by the BW Gold project engineers on a regular interval'<br>Added 'mobilize to site for periodic visits to ensure soils to be salvage have been clearly marked'<br>Replaced 'designating' with 'reviewing the designation of'<br>Replaced 'present during' with 'remotely monitoring'<br>Replaced 'collect' with 'review' | Allows work to progress without the QP on site while maintaining QP oversight and responsibility.   |
| 15.5.4 Nitrogen Dioxide and Sulfur Dioxide Monitoring     | Replaced 'will be' with 'are'<br>Removed 'prior to the start of major'<br>Added 'will be installed'  | Updated to reflect current operations and timing.   |
| 15.6.1 Erosion and Sediment Control Monitoring            | Added 'determined at the discretion of the environmental monitor' for sampling frequency after significant rainfall events<br>Added 'These actions are detailed in EMA permit 110652 – Conditions 3.4 Trigger Response Plan for Authorized Discharge to Davidson Creek, condition 3.6 Erosion and Sediment Control Plan and Conditions 6.1-6.3 Non-Compliance Reporting'   | Updating information<br><br>To include relevant permit conditions   |
| 15.8.1 Pre-construction                                   | Replace '2022 is anticipated to include' to '2022 included'  | Grammatical updates to current place in time  |
| 16.1.1 Weekly Inspection                                  | Replaced Report with Inspection<br>Replaced 'Monitoring form' with 'Compliance Checklist'  | Updated to reflect current operations.  |

| <b>Section</b>                              | <b>Revision</b>   | <b>Rational</b>  |
|---|---|--|
| 16.1.2 Monthly Report                       | <p>Replaced 'Environmental Monitoring' with 'Consolidated BW Gold Construction' report.</p> <p>Added 'provide environmental performance metrics' and 'provide updates on permitting and environmental compliance'.</p> <p>Removed 'Distribution of the report outside the Project Tema is the responsibility of BW Gold's EM.</p> <p>Added 'Monthly updates of the implementation of the CEMP will be provided to the EMB and ELoMC through verbal or short presentations</p> | <p>Updated to current operations</p> <p>To include report details<br/>The report is an internal report.</p> <p>Updated to recognize reporting system</p> |
| 16.2.2 Environmental Life of Mine Committee | Replaced Environmental Monitoring Committee with Environmental Life of Mine Committee   | Updated to current activities.<br>Committee was replaced by ELoMC.   |
| 16.3 Record Keeping                         | Revisions to language   | Editorial revisions for clarity  |
| 16.1.4 Incident Reporting                   | Added 'either the area or contractor supervisor and/or'   | Updated to reflect current activities  |
| 18.0 Plan Revisions                         | Replaced change process with revised versions will be 'provided along with a change log EMLI, EAO, MoF/WLRS, ENV, and Indigenous groups   | Updated to reflect current activities  |
| 19.0 Qualified Registered Professionals     | Use of language to include 'registered' in qualified professionals  | Updated to be consistent with terminology used by local government   |
| Appendices                                  | <p>Added related transmission line management plans as appendices:</p> <p>Appendix J – TL Construction Environmental Plan</p> <p>Appendix K – TL Surface Erosion Prevention and Sediment Control</p> <p>Appendix L – TL Integrated Vegetation Management Plan</p> <p>Appendix M – TL Industrial and Domestic Waste Management Plan</p> <p>Appendix N – TL Fuel Management and Spill Control Management Plan</p>   | Added to include associated Transmission Line plans  |

## 2. TL CEMP

The following presents a summary of the primary changes made since the Transmission Line Construction Environmental Management Plan was last updated. Editorial grammar and spelling revisions have not been included in this summary.

| Section  | Revision  | Rational                                      |
|--|---|---|
| Table of Contents – Appendix As                            | Added Concordance Table date  | Clarity                                       |
| 1.0 Project Overview                                       | Added details around mine water treatment and use of electricity for treatment once mine is commissioned  | Updated to current activities                 |
| 3.0 Roles and Responsibilities                             | Replaced reference to Environmental Monitoring Committee with Environmental Life of Mine Committee<br>EMC replaced with ELoMC changed throughout document.  | Pursuant to Condition 19 of the EAC #M19-01.  |
| 3.0 Roles and Responsibilities                             | Replaced long-hand ministry names with accepted abbreviations for BC EMLI, BC ENV, and BC MOF/WLRS  | Update to match BC ministries current titles. |
| 4.1 Legislation and Regulations                            | Added “Health” to the title of Mine Act Health, Safety and Reclamation Code under Mines Act   | Correction                                    |
| 4.3 Existing Permits                                       | Added text to reference to receipt of Mines Act permit M-246 on March 8, 2023, and Environmental Management Act permits PE-110650, and PE 110652.   | Update to include current permits             |
| 4.5.1 Wetlands – Table 4.5-1                               | Updated "Summary Table of Wetlands within the Right-of-Way" resulting in change of areas for 5 of 15 wetland types, total value - 1.67 replaced by 2.13 (an increase of 0.46 ha)  | Updated to reflect re-route                   |
| 7.2 Fish, Fish Habitat, and Aquatic Resources, Table 7.2-1 | Updated "Major Watercourse Crossing Width and Span" table. Updates made for all 12 listed rivers and creeks. Also noted that the Davidson Creek crossing is located within the mine site area (permitted mine area).  | Updated to reflect re-route                   |
| 9.6.2 Wildfire Response                                    | Added - BW Gold will follow BW Gold’s Accidents and Malfunctions Communication Plan to notify Indigenous Nations  | Update to reflect current activities          |
| 9.8.3 Invasive Plant Species                               | Added Siak’us First Nation to Table 9.8-3   | Update to reflect current activities          |
| 10.3 Spill Response Equipment- Table 10.2.1                | Added BW Gold Environmental Manager name and contact phone number.<br>Added and updated contact information names/phone numbers/email addresses for: Ulkatcho First Nation Office, Lhoosk’uz Dené Nation, Nadleh Whut’en First Nation, Stellat’en First Nation, Nazko First Nation, Métis Nation British Columbia, and Nee-Tahi-Buhn Band." | Updated contact information                   |
| 12 Project Orientation                                     | Added ‘cultural awareness and sensitivity training’ to orientation session content.   | Updated to reflect current activities         |

| <b>Section</b>                            | <b>Revision</b>  | <b>Rational</b>  |
|---|--|--|
| 12 Project Orientation                    | Revised the published date of the reference to Health, Safety and Reclamation Code in British Columbia (EMLI), to 2022 from 2021   | Updated to current Mines Act code  |
| 16.2.2 Environmental Monitoring Committee | Replaced Environmental Monitoring Committee with Environmental Life of Mine Committee,<br>Added permit 'Conditions A(10)(a-c) of the M-246 Mines Act Permit, and Condition 3.7 of the Environmental Management Act permit PE 110652' | Updated to reflect committee name change and reflect current activities. |
| 18 Plan Revision                          | Replaced section with 'revisions will be made in accordance with the parent plan (EAC Condition 13, Construction Environmental Management Plan)'   | Changed to reflect plans will be reviewed with parent EAC plan           |
| 19 Qualified Professional                 | added QP EGBC License number, and QP employer Permit to Practice number.   |  |

### **3. TL SEPCP**

The following presents a summary of the primary changes made since the Transmission Line Surface Erosion Prevention and Sediment Control Plan was last updated. Editorial grammar and spelling revisions have not been included in this summary.

| <b>Section</b>                 | <b>Revision</b>   | <b>Rational</b>  |
|--------------------------------|---|--|
| 3.0 Roles and Responsibilities | Replaced reference to Environmental Monitoring Committee with Environmental Life of Mine Committee.<br>EMC replaced with ELoMC changed throughout document. | Pursuant to Condition 19 of the EAC #M19-01.                   |
| 10 Plan Revisions              | Replaced section with 'revisions will be made in accordance with the parent plan (EAC Condition 13, Construction Environmental Management Plan)'            | Changed to reflect plans will be reviewed with parent EAC plan |

#### 4. TL IVMP

The following presents a summary of the primary changes made since the Transmission Line integrated Vegetation Management Plan was last updated. Editorial grammar and spelling revisions have not been included in this summary.

| <b>Section</b>                           | <b>Revision</b>  | <b>Rational</b>  |
|--|--|--|
| 3.0 Roles and Responsibilities           | Replaced reference to Environmental Monitoring Committee with Environmental Life of Mine Committee.<br>EMC replaced with ELoMC changed throughout document.  | Pursuant to Condition 19 of the EAC #M19-01.                   |
| 4.3 Permit Requirements                  | Updated to include LOO permits #7409823 and #7410296 and OLTC # L52116, L52117, L52136, LL52137, and L52140.   | Updated based on TL re-route                                   |
| 6.1 Ecosystem Composition                | Table 6.1-1 updated Right of Way hectares to reflect results of most recent survey   | Updated based on TL re-route                                   |
| 6.2 Plant Species and Ecosystems at Risk | Table 6.2-1 updated Right of Way hectares to reflect results of most recent survey   | Updated based on TL re-route                                   |
| 6.3 Sensitive Ecosystems                 | Removed hectares and updated number of wetlands within the TL Row.<br>Wetland areas within the TL RoW increased from 79 to 121.<br>Blue-listed areas reduced from 9 to two that are to be crossed. | Updated based on TL re-route                                   |
| 7.2 Plant Species and Ecosystems at Risk | Removed text and figure no longer relevant. Added herbicide application in accordance with Indigenous herbicide policy   | To include Indigenous herbicide policy                         |
| 8.6 Herbicide Control                    | Moved herbicide application methods from section 8.5 to 8.6 and added text around herbicide policies and application.  | Edited for clarity   |
| 12 Plan Revisions                        | Replaced section with 'revisions will be made in accordance with the parent plan (EAC Condition 13, Construction Environmental Management Plan)'   | Changed to reflect plans will be reviewed with parent EAC plan |
| Appendix D                               | Added FN Herbicide Policies  | Added to include relevant policies                             |

## 5. TL IDWMP

The following presents a summary of the primary changes made since the Transmission Line Industrial and Domestic Waste Management Plan was last updated. Editorial grammar and spelling revisions have not been included in this summary.

| Section  | Revision  | Rational   |
|--|---|--|
| 3.0 Roles and Responsibilities                                 | Replaced reference to Environmental Monitoring Committee with Environmental Life of Mine Committee.<br>EMC replaced with ELoMC changed throughout document.   | Pursuant to Condition 19 of the EAC #M19-01.                                   |
| 6.2 Recycling Policy   | Added text 'All recyclables will be transported by the EPC Contractor to facilities such as the Vanderhoof Recycling Depot or the Vanway Regional Transfer Station in Prince George'<br><br>Added text outlining disposal method for oil gator (and similar hydrocarbon products) | Specifying collection and transfer locations                                   |
| 6.4 Transportation of Waste Materials                          | Added text 'Service trucks will be equipped with an oil evacuation system that is designed to drain, evacuate, and transfer used oil to a holding tank on the service truck.'   | Specifying type of oil evacuation systems on service trucks                    |
| 7.1 Refuse   | Added sources of refuse during decommissioning  | Addition of refuse sources   |
| 7.1.1 Industrial Waste   | Added 'The burning of untreated wood & lumber, pallets, paper products and cardboard would emit primarily particulates, but any impacts would be limited to areas near the burn.'   | Clarification regarding industrial waste burning                               |
| 11 Plan Revision   | Replaced section with 'revisions will be made in accordance with the parent plan (EAC Condition 13, Construction Environmental Management Plan)'  | Changed to reflect plans will be reviewed with parent EAC plan                 |
| 11.1 Notification and Consultation Required upon Plan Revision | Section removed   | Process captured in Condition 13 - Construction Environmental Management Plan. |

## 6. TL FUEL MANAGEMENT AND SPILL CONTROL

The following presents a summary of the primary changes made since the Transmission Line Fuel Management and Spill Control was last updated. Editorial grammar and spelling revisions have not been included in this summary.

| <b>Section</b>                                      | <b>Revision</b>   | <b>Rational</b>  |
|---|---|--|
| 3.0 Roles and Responsibilities                      | replaced reference to Environmental Monitoring Committee with Environmental Life of Mine Committee.<br>EMC replaced with ELoMC changed throughout document. | Pursuant to Condition 19 of the EAC #M19-01.                   |
| 4.3 Existing Permits                                | Added – details on the Mines Act permit M-245 and EMA permits 110650 and 110652   | Updated to include permit details                              |
| 4.3 Existing Permits                                | Added – details on the received License of Occupation permit  | Updated to include permit details                              |
| 5.2.2 External Communication                        | Update – contact details<br>Added – Indigenous contacts   | Updated to current contact information                         |
| 11.1.1 Monitoring Reporting and Contact Information | Update Table 11.1-1 with current contact details  | Updated to current contact information                         |
| 13 Plan Revision                                    | Replaced section with ‘revisions will be made in accordance with the parent plan (EAC Condition 13, Construction Environmental Management Plan)’            | Changed to reflect plans will be reviewed with parent EAC plan |

## BLACKWATER NOISE AND VIBRATION EFFECTS MONITORING AND MITIGATION MANAGEMENT PLAN

### 1. NOISE AND VIBRATION EFFECTS MONITORING AND MITIGATION PLAN

The following presents a summary of the primary changes made to the Noise and Vibration Effects Monitoring and Mitigation management plan. Editorial grammar and spelling revisions have not been included in this summary.

| Section  | Revision  | Rationale  |
|--|---|--|
| Acronyms and Abbreviations                           | Environmental Life of Mine Committee (ELoMC) replaces Environmental Monitoring Committee (EMC)  | Updating based on current information and references   |
| 1.0 Project Overview                                 | Text edits to Closure phase and adjust Years in line with current plans.  | Readability and context  |
| 2.0 Purpose and Objectives                           | Added Human exposure to mine is also managed through EMLI and relevant Health, Safety, and Reclamation Code Tables  | Referencing relevant regulations   |
| 2.0 Purpose and Objectives                           | Added reference to concordance table identifying EAC #M-19 in Appendix A.<br>Added reference to transmission Line Noise and Vibration Management Plan is referenced in Appendix B | Provide reference to Appendices  |
| 3.0 Roles and Responsibilities<br>Table 3-1          | Grammar edits in table<br><br>Removed Environmental Monitors<br>Replaced Aboriginal with Indigenous<br>Added 'Registered' to qualified registered professional                    | Readability and context<br><br>Consistent with current practices<br>Appropriate word choice<br>Current regulations |
| 3.0 Roles and Responsibilities                       | Replaced Environmental Monitoring Committee with Environmental Life of Mine Committee<br>EMC replaced with ELoMC changed throughout document.                                     | Pursuant to Condition 19 of the EAC #M19-01.   |
| 4.2 Existing Permits                                 | Added Mines Act permit M-246 reference  | Reference to permit received   |
| 9.5 Traditional Ecological or<br>Community Knowledge | Replaced Aboriginal with Indigenous   | Appropriate word choice  |
| 11.2 Record Keeping                                  | Replace Environmental Monitoring Committee with Environmental Life of Mine Committee  | Updated to current activities  |

| <b>Section</b>    | <b>Revision</b>  | <b>Rationale</b>  |
|-------------------|--|---|
| 13. Plan Revision | Removed draft and final  | Plan is in final version and will be revised as per plan revision process |
| Appendix B        | Appended Transmission Line Noise and Vibration Management Plan | For reference   |

## 2. TL NOISE AND VIBRATION

The following presents a summary of the primary changes made to the Transmission Line Noise and Vibration Management Plan. Editorial grammar and spelling revisions have not been included in this summary.

| <b>Section</b>                 | <b>Revision</b>   | <b>Rationale</b>                                      |
|--------------------------------|---|---|
| Acronyms and Abbreviations     | Replaced reference to Environmental Monitoring Committee with Environmental Life of Mine Committee  | Updated to reflect committee name change              |
| 4.0 Roles and Responsibilities | Replaced Environmental Monitoring Committee with Environmental Life of Mine Committee<br>EMC replaced with ELoMC changed throughout document. | Pursuant to Condition 19 of the EAC #M19-01.          |
| 12 Plan Revisions              | Replace revisions text to reference parent EAC revision process   | Revisions process is now outlined in parent EAC plan. |
| 12 Plan Revisions              | Deleted section 12.1  | Revisions process is now outlined in parent EAC plan. |

## BLACKWATER WILDLIFE MITIGATION AND MONITORING PLAN

The following presents a summary of the primary changes made since the Wildlife Mitigation and Monitoring Plan was last updated. This table is current to the I.1 version of the plan. Editorial revisions (grammar, spelling) have not been included in this summary.

| Section  | Revision  | Rationale   |
|--|---|---|
| Acronyms and Abbreviations                     | Updating references and language  | Updating to reflect most relevant and current terminology   |
| 1.0 Project Overview                           | Editorial revisions   | Consistency in introduction in all Blackwater management plans  |
| 1.1 Purpose and Objectives                     | Added reference to Appendix G - Transmission Line Vegetation and Access Management Plan                 | For clarity.  |
| 1.2 Roles and Responsibilities                 | Editorial revisions   | Consistency in project roles and responsibilities across all Blackwater management plans  |
| 1.2 Roles and Responsibilities                 | Replace Environmental Monitoring Committee with Environmental Life of Mine Committee                    | Pursuant to Condition 19 of EAC #M19-01   |
| 1.3.3 Guidelines and Best Management Practices | Added reference to Management Plan for Mountain Goat  | Updating relevant document list   |
| 1.4 Adaptive Management Framework              | Added definition to QP – individual registered in BC  | A 'registered' professional is defined as in the BC Professional Governance Act as a registrant with an association identified as a subject to the act. |
| 1.4 Adaptive Management Framework              | Replaced FLNROD with MOF  | To reflect government department name change.<br>Replaced throughout.   |
| 2.0 Support                                    | Revised language for Wildlife education and awareness topics regarding avoiding harm to migratory birds | Updated to reflect revised language used in federal regulation  |
| 2.1 Training and Awareness                     | Replace 'during site orientation and during annual refreshers' with 'as required'.                      | Training will occur as necessary.   |

|   |  |  |
|---|--|--|
| 2.1 Training and Awareness – Wildlife education and awareness topics            | Added ‘harm to migratory birds, their eggs, and nests’ to last bullet  | Added for clarity  |
| 3.0 Mitigation and Management Table 3-1   | Updated table to indicate which stage of mine life each mitigation would occur   | Updated as per EAO comment #25 regarding phases when each mitigation would occur                                       |
| 3.3.1 Sensitive Timing Windows Table 3.3-1                                      | Updated references and language  | Based on current information   |
| 3.7 Aircraft Management   | Added “landscape features will be communicated to pilots using maps or waypoints for the pilot’s GPS”  | Clarification  |
| 3.10.2 Response Detering Habituated Bears                                       | Added examples of adverse conditions activities  | Updated as per comment #1939 of the Joint MA/EMA ITT   |
| 4.1.3.2 Monitoring Toad Mortality on Roads                                      | Added text ‘road based surveys will be completed across multiple days during each of the spring and July surveys.  | Updated as per EAO comment #178  |
| 4.1.3.3 Monitoring Toad Breeding Ponds  | Added “surveys will be conducted in July or August of each year, when tadpoles are easily observed and identified”                                       | Updated as per comment #1712 of the Joint MA/EMA ITT   |
| 4.1.3.4 Facility Waterbody Monitoring   | Added additional information regarding timing of surveys   | Updated as per comment #1764 of the Joint MA/EMA ITT   |
| 4.2.-2 Follow-up Monitoring for Bats  | Revised passage regarding triggers   | Indicated more specific thresholds   |
| 4.2.3. Monitoring of Predicted Effects and Mitigation Effectiveness Table 4.2-2 | Added example text ‘ 50% decline in diversity or distribution in the test sites within the bugger zones  | Updated as per comment #1718 of the Joint MA/EMA ITT   |
| 4.2.3.1 Buffer Zone Monitoring  | Objective 1, first bullet reworded   | For clarity  |
| 4.2.3.1 Buffer Zone Monitoring  | Added text ‘at least 20 sites will be monitored during the bat roosting period.. based on 2023 construction plans, and based on 2021/2022’ field results | Response to ITT Comment to specify the number of sites with bats, as well as relative bat activity in future versions. |

|  |   |  |
|--|---|--|
| 4.5 Mountain Goat                                  | New section based on mountain goat observations and habitat on Mt Davidson  | Documented by Keefer in early 2023 and added to include mitigations for mountain goats         |
| 4.7.2 Mitigation for Grizzly Bears                 | Table 4.7-1 under Critical habitat added text 'with alpine, subalpine or montane environments   | Added for clarity  |
| 4.7.2.1 Pre-clearing Surveys for Grizzly Bears     | Revised language and added clarity regarding use of a trained dog to find grizzly bears   | Clarification  |
| 4.7.3.4 Monitoring of Kokanee Spawning Streams     | Added "additional statistical details will be added upon implementation of this program"  | Updated as per comment #1750 of the Joint MA/EMA ITT   |
| 4.8.1 Baseline and Pre-construction Surveys        | Moved maps and sentence regarding raptor stick nest observations in 2021  | Clarity and section re-arrangement   |
| 4.8.2.1 Pre-clearing Surveys for Birds             | Added point count distances and noted that additional details for monitoring buffered nests will be provided in a separate SOP  | Updated as per comment #1722 and 1725 of the Joint MA/EMA ITT                                  |
| 4.8.3.6 Transmission Line Monitoring               | Objectives – replaced waterbird with migratory and breeding bird.<br>Performance Indicators – replaced waterbird individuals with bird.<br>Added bullet regarding reference to details on the sites chosen for monitoring and triggers<br>Triggers or Thresholds – replaced waterbird with bird (including waterbirds, upland birds, and/or raptors). | Response to comment #170.<br><br>Updated as per comment #1751 and 1752 of the Joint MA/EMA ITT |
| 4.8.3.8 Electromagnetic Fields                     | Added LDN and UFN to list of nations that will be consulted on studies involving potential effects of electromagnetic fields on birds   | Request to be included as part of the study  |
| 4.8.3.10 Nest Success Surveys                      | Added clarification to bullets under data collection – survey methods:  | Clarity and additional specifications  |
| 4.9.3 Monitoring for Invertebrates                 | Clarified "Jutta arctic butterfly" and "American emerald dragonfly"   | Clarifying full name   |
| 4.10.3 Monitoring for Plant Species and Ecosystems | Re-arranged section   | Clarity and flow of reading  |
| 8.0 Qualified Registered Professionals             | Added "registered" with QP and revised language   | Updated language based on existing nomenclature used by local government                       |

|                |   |  |
|----------------|---|--|
| 9.0 References | Updated list  | Based on current information and references used throughout report |
| Appendix F     | Added Bird Pre-clearing Standard Operating Procedure          | Reference to document  |
| Appendix G     | Added Transmission Line Vegetation and Access Management Plan | For reference.   |

Section 5.2 removed reporting to IAAC bullets.

## BLACKWATER TRANSMISSION LINE VEGETATION AND ACCESS MANAGEMENT PLAN

The following presents a summary of the primary changes made since the Transmission Line Vegetation and Access Management Plan. Editorial grammar and spelling revisions have not been included in this summary.

| Section                        | Revision  | Rationale                                       |
|--------------------------------|---|---|
| Acronyms and Abbreviations     | Added and replaced acronyms   | Updated to reflect current terminology          |
| 3.0 Roles and Responsibilities | Replaced Environmental Monitoring Committee with Environmental Life of Mine Committee<br>EMC replaced with ELoMC changed throughout document.   | Pursuant to Condition 19 of the EAC #M19-01.    |
| 7.4 Access Prescriptions       | Replaced developed with discussed<br>Replaced 'The prescriptions will be reflected in an access management plan, a stand-alone document consistent with this TL VAMP. The working document will inform construction and post-construction TL specific circumstances identified by AMWG members. Prescriptions will include mitigation strategies consistent with the Vanderhoof Land and Resource Management Plan, other EAC Plans and this TL VAMP.<br><br>With 'BW Gold will create a list of mutually-agreed access prescriptions called "Access Management Prescriptions" which will be incorporated into the overall planning process of the transmission line. The prescriptions will inform Prescriptions may also include mitigation strategies consistent with the Vanderhoof Land and Resource Management Plan, other EAC Plans and this TL VAMP. | Changes to reflect agreed upon process.         |
| 13.0 Plan Revision             | Revised paragraph to note that any revisions to this plan will be made in accordance with (Condition 23 – Wildlife Mitigation and Monitoring Plan)  | Continuity in revisions across management plans |





March 28, 2024

Tracey Janes  
Project Assessment Director  
Environmental Assessment Office  
PO Box 9426 Stn Prov Govt  
Victoria, BC  
V8W 9V1

Dear Tracey Janes:

The Environmental Assessment Office (EAO) approved the Wetland Management and Offsetting Plan (WMOP; plan) on February 14, 2023 with the following direction to be taken within a year:

1. Engage in consultation with Lhoosk'uz Dené Nation and Ulkatcho First Nation to continue to evaluate Dykam Ranch as an offsetting option and consider other wetland initiatives as alternatives to fulfil the offsetting objectives of the plan.
2. Update the plan to make it more concise and ensure it contains the necessary prescriptions and steps for implementation and to facilitate enforcement.

The WMOP was revised to reflect this direction and has been specifically modified to meet that request. This letter documents the major changes that were made to the report. To satisfy Direction 1 the following revisions were made to the WMOP:

1. **Section 9.1 Indigenous and Government Agency Engagement** was revised to include 2023 engagement with Lhoosk'uz Dené Nation and Ulkatcho First Nation on alternative offsetting sites.
2. **Appendix E Addressing Offsetting Alternatives** was prepared by EcoLogic Consultants Ltd., and is summarized in WMOP Sections 7.1.5 and 9.5.
3. **Appendix N 2024 WMOP Information Tracking Table** details edits to WMOP as requested by Indigenous Groups and Government Agencies.

Dykam Ranch remains part of the WMOP, as the alternative offsetting sites do not provide sufficient area to replace Dykam Ranch. If a decision was made to include an offset from the EcoLogic alternatives report, additional efforts would be required to advance restoration prescriptions.

To satisfy direction point 2 the following revisions were made to the WMOP:

1. Baseline Information has been reduced and moved to Appendix D and H.



2. Evaluation of Wetland Function has been reduced (combined with Baseline Information) and moved to Appendix D, F, and J.

Table 1 presents detailed notes on the changes made to each section of the WMOP in fulfilment of EAO's direction, and to address ITT comments.

Sincerely,

*Alexandra Gresiuk*

Alexandra Gresiuk  
Regulatory Approvals Specialist  
Artemis Gold Inc.



**Table 1. Detailed Summary of Section Revisions Made Since Version F.1 of the WMOP**

| H.1 Section | Section Title  | F.1 (Dec 2022) Section | Changes Since F.1 (Dec 2022)  |
|-------------|--|------------------------|---|
| 1           | Project Overview   | 1                      | Minimal (Updated references/sections with minimal text edits).  |
| 1.1         | Spatial and Temporal Boundaries  | 1.1                    | Minimal (Updated references/sections with minimal text edits).  |
| 2           | Purpose and Objectives   | 2                      | Minimal (Updated references/sections with minimum text edits). Ecosystem Dynamics Figure removed.   |
| 3           | Roles and Responsibilities   | 3                      | Minimal (Updated references/sections with minimum text edits).  |
| 4           | Compliance Obligations, Guidelines, and Best Management Practices      | 4                      | Minimal (Updated references/sections with minimum text edits).  |
| 4.1         | Legislation  | 4.1                    | Minimal (Updated references/sections with minimum text edits).  |
| 4.2         | Environmental Assessment Certificate and decision Statement Conditions | 4.2                    | Minimal (Updated references/sections with minimum text edits).  |
| 4.3         | Guidelines and Best Management Practices                               | 4.3                    | Minimal (Updated references/sections with minimum text edits).  |
| 4.4         | Existing Permits   | 4.4                    | Minimal (Updated references/sections with minimum text edits).  |
| 4.5         | Linkage to Other Management Plans                                      | 4.5                    | Minimal (Updated references/sections with minimum text edits).  |
| 5           | Adaptive Management  | 5                      | Minimal (Updated references/sections with minimum text edits).  |
| 6           | Training and Awareness   | 6                      | Minimal (Updated references/sections with minimum text edits).  |
| 7           | Wetland Baseline Information   | 7                      | Baseline Information and Evaluation of Wetland Function combined into Section 7. Information reduced and migrated to Appendix D. Edits to individual sections described below.<br>Calculations of baseline wetland information for each individual wetland and wetland function gains/losses updated using the most up to date data current to February 2024, including the following updated data: |

| H.1 Section | Section Title                       | F.1 (Dec 2022) Section | Changes Since F.1 (Dec 2022)  |
|-------------|-------------------------------------|------------------------|---|
|             |                                     |                        | <p>Plot location data (January 2024) – Received December 2022 version of plot data from EcoLogic and performed spatial join with wetland polygons. Additional review/edits completed to ensure complete info for plot type, Plot ID, Wetland ID, as in Table H-1.</p> <p>Wetland polygon mapping (February 2024) – Additional 125 wetland polygons included (937 wetlands vs. 812) combining offsetting sites and Project area polygons surveyed by EcoLogic and wetland polygons as in the EA for the Fresh Water Supply System (Appendix F; Table F-1). Further refinement of wetland attributes (e.g., Wetland ID, Wetland Class) completed.</p> <p>Mathews Creek Ranch Pond footprints (December 2023) – Updated pond footprints received and used to produce an outer pond footprint boundary.</p> |
| 7.1         | Site Selection and Study Area       | 7.1                    | Additional text added for other potential offsetting sites, addressing ITT comments.  |
| 7.1.1       | Project Area                        | 7.1.1                  | Minimal (Updated references/sections with minimum text edits).  |
| 7.1.2       | Mathews Creek Ranch Offsetting Site | 7.1.2                  | Minimal (Updated references/sections with minimum text edits).  |
| 7.1.3       | Capoose Caribou Offsetting Site     | N/A                    | New section added.  |
| 7.1.4       | Dykam Ranch Offsetting Site         | 7.1.3                  | Minimal (Updated references/sections with minimum text edits).  |
| 7.1.5       | Other Potential Offsetting Sites    | N/A                    | New section added following updated and new figures of the mine site, Mathews Creek Ranch, and Dykam Ranch and their associated wetland survey locations and wetland complexes to address ITT comments.   |
| 7.2         | Pre-construction Surveys            | 7.2                    | Information reduced and migrated to Appendix D, including F.1 Sections 7.2.1 to 7.3 (including field survey methods, data collection, wetland classification and mapping).  |
| 7.3         | Summary of Baseline Results         | 7.4                    | Calculations of baseline wetland information updated based using the most up to date data current to February 2024 as per above. Text edits include addition of a conservative approach to the BC CDC listing for Ws07.   |
| 7.3.1       | Project Area                        | N/A                    | New section added to reflect visual and full plots for wetland surveys, addressing ITT comments. Calculations of baseline wetland information updated based using the most up to date data current to February 2024 as per above.   |
| 7.3.1.1     | Mine Site                           | 7.4.1                  | Calculations of baseline wetland information updated based using the most up to date data current to February 2024 as per above.  |



| H.1 Section | Section Title                                       | F.1 (Dec 2022) Section | Changes Since F.1 (Dec 2022)  |
|-------------|---|------------------------|---|
| 7.3.1.2     | Transmission Line                                   | 7.4.2                  | Calculations of baseline wetland information updated based using the most up to date data current to February 2024 as per above.  |
| 7.3.1.3     | Other Project Components                            | 7.4.3                  | Calculations of baseline wetland information updated based using the most up to date data current to February 2024 as per above. Additional information added relative to the Freshwater Supply Line.   |
| 7.3.2       | Mathews Creek Ranch Offsetting Site                 | N/A                    | Calculations of baseline wetland information updated based using the most up to date data current to February 2024 as per above. New section added to expand on baseline results in the Mathews Creek Ranch, addressing ITT comments.   |
| 7.3.3       | Dykam Ranch Offsetting Site                         | N/A                    | New section added to expand on baseline results in Dykam Ranch, addressing ITT comments.  |
| 7.4         | Evaluation of Wetland Functions                     | 8                      | Updated references/sections with minimum text edits. Information pertaining to the wetland function rubric was removed and migrated to Appendix D. Additional text was also added to further discuss wetland functional area, addressing ITT comments. Calculations of wetland function (gains/losses) updated based using the most up to date data current to February 2024 as per above.  |
| 7.4.1       | Wetland Function Losses                             | 8.2.1                  | Text updated for conciseness and clarity to address ITT comments. Loss methodology updated to address ITT comments W119 and W121 to consider both direct and indirect impacts. Additional information provided in appendices: Appendix F addition of Table F-2 Project Area Loss, Addition of Appendix K maps for wetland direct loss and indirect impacts (Year 23 Full build-out), and Appendix M for direct loss and indirect impacts for the as-built Year -2 (2023) footprint. |
| 7.4.1.1     | Project Area Losses                                 | 8.2.1                  | Updates of this section were completed to address ITT comments and use newly available information, including re-calculation of wetland loss, defining impacts and direct loss, addition of methodology text, and a figure for the predicted direct and indirect impacts towards the mine for the Year 23 full build-out. Calculations of wetland function loss updated based using the most up to date data current to February 2024 as per above.                                 |
| 7.4.1.2     | Functional Area (FA) Associated with Wetland Losses | 8.2.2                  | Updated according to new loss methodology and for additional clarity as per above. Updates of references/sections were completed. Additional edits were made to address ITT comments by the addition of methodology text.   |
| 7.4.2       | Wetland Function Gains                              | 8.2.3                  | Additional edits were made to address ITT comments by the addition of methodology text.   |



| H.1 Section | Section Title   | F.1 (Dec 2022) Section | Changes Since F.1 (Dec 2022)  |
|-------------|---|------------------------|---|
| 7.4.2.1     | Functional Area (FA) Associated with Wetland Gains            | 8.2.4                  | Updates of this section were completed to address ITT comments and use newly available information, including re-calculation of wetland gains, defining criteria, and addition of methodology text. Mathews Creek gains updated based using the most up to date data current to February 2024 as per above, including excluding new Pond footprints (December 2023).                    |
| 8           | Mitigation and Management Measures                            | 9                      | Information reduced and migrated to Appendix P.   |
| 9           | Wetland Offsetting Implementation                             | 10                     | Updated to detail implementable prescriptions to address ITT comments and based on consultation regarding additional offsetting sites. Edits to individual sections described below.  |
| 9.1         | Indigenous and Government Agency Engagement                   | 10.1                   | Minimal (Updated references/sections with minimum text edits).  |
| 9.2         | Mathews Creek Ranch Offsetting Site                           | 10.2.1                 | Re-organization and updates to figures and summary table of active restoration activities. Categories of active and passive restoration were also created to define Zone C as passive restoration in response to ITT comments. Minimal text edits and reference/sections updates.   |
| 9.2.1       | Land Tenure and Long-Term Preservation                        | 10.2.2                 | A new figure was created for Zone A & B of Mathews Creek Ranch with minimal text edits and updates to sections/references.  |
| 9.2.2       | Zone A -Mathews Creek Riparian Area and fish Offsetting Ponds | 10.2.3                 | Prescriptions for Zone A have been altered and re-organized in response to ITT comments. Invasive species management is the primary prescription for active restoration discussed in the WMOP. This section has been structured to be more easily implemented on site.  |
| 9.2.2.1     | Fish Habitat Offsetting Ponds                                 | N/A                    | New section added for reference to the FHOP in response to ITT comments.  |
| 9.2.2.2     | Invasive Species Management                                   | 10.2.4                 | Updated to include data from the 2022 and 2023 annual invasive plant species survey, additional figures to identify areas of concern, with reference to the IPMP.   |
| 9.2.3       | Zone B – Hay Fields and Pastureland                           | 10.2.4                 | Prescriptions for Zone B have been altered and re-organized in response to the ITT comments. The new active restoration prescriptions include invasive and undesired species management, restoring native wetland vegetation to support wildlife, and restoring wetland conditions altered by human activities. This section has been structured to be more easily implemented on site. |
| 9.2.3.1     | Site Preparation  | N/A                    | New section added to address the ITT comments and further discuss new prescriptions.  |



| H.1 Section | Section Title  | F.1 (Dec 2022) Section | Changes Since F.1 (Dec 2022)  |
|-------------|--|------------------------|---|
| 9.2.3.2     | Revegetation   | N/A                    | New section added to address the ITT comments and further discuss new prescriptions.  |
| 9.2.3.3     | Vegetation Buffer  | N/A                    | New section added to address the ITT comments and further discuss new prescriptions.  |
| 9.2.3.4     | Invasive Species Management                              | N/A                    | New section added to address the ITT comments and further discuss new prescriptions.  |
| 9.2.4       | Zone C – Passive Restoration Area                        | 10.2.5                 | Prescriptions for Zone C have been altered and re-organized in response to the ITT comments. All previously proposed prescriptions for active restoration have been removed, including infilling of ditches. Passive restoration only is discussed for this zone to encourage natural restoration of the present recovering wetlands. This section has been structured to be more easily implemented on site. |
| 9.2.5       | Restoration Field Survey                                 | 10.2.6                 | Minimal (Updated references/sections with minimum text edits). Removed summary table of restoration activities and relocated it to Section 9.2.   |
| 9.3         | Capoose Caribou Offsetting Site                          | 10.3                   | Minimal (Updated references/sections with minimum text edits). Included existing figure in this section of wetlands potentially restored by road rehabilitation.  |
| 9.4         | Dykam Ranch Offsetting Site                              | 10.4                   | Minimal (Updated references/sections with minimum text edits), addressing ITT comments.   |
| 9.4.1       | Land Tenure and Long-term Preservation                   | 10.4.1                 | Minimal (Updated references/sections with minimum text edits).  |
| 9.5         | Other Proposed Offsetting Sites                          | N/A                    | Newly added section discussing other potential offsetting sites, addressing ITT comments.   |
| 9.6         | Implementation Schedule                                  | N/A                    | Newly added section discussing potential timelines for restoration activities, addressing ITT comments.   |
| 9.7         | Wetland Offsetting Accounting                            | 10.5                   | Section 9.7 updated for additional clarity on methodology. Calculations updated to reflect loss methodology change and updated data. Additional details provided for Wetland Function Losses (Section 7.4.1) and Gains (Section 7.4.2). Actual Y-2 (2023) as-built losses added.  |
| 10          | Monitoring   | 11                     | Updated based on new wetland function loss methodology (Section 7.4.1), updated field survey methods, and to address ITT comments. Edits to individual sections described below.  |
| 10.1        | Monitoring Objectives                                    | 11.1                   | Minimal (Updated references/sections with minimum text edits).  |
| 10.2        | Monitoring to Compare Actual Effects with EA Predictions | 11.2                   | Minimal (Updated references/sections with minimum text edits).  |



| H.1 Section | Section Title                           | F.1 (Dec 2022) Section | Changes Since F.1 (Dec 2022)  |
|-------------|---|------------------------|---|
| 10.3        | Site Selection                          | N/A                    | Newly added section discussing project area wetlands criteria, addressing ITT comments.   |
| 10.3.1      | Project Area Wetlands                   | N/A                    | Newly added section discussing project area wetlands criteria, addressing ITT comments.   |
| 10.3.2      | Offsetting Sites                        | N/A                    | Newly added section discussing offsetting site criteria, addressing ITT comments.   |
| 10.3.3      | Reference Wetlands                      | 11.4                   | Minimal (Updated references/sections with minimum text edits) and re-organized in section order.  |
| 10.4        | Monitoring of Loss and Gain in Wetlands | 11.3                   | Minimal (Updated references/sections with minimum text edits).  |
| 10.4.1      | Methodology Guidance                    | 11.3.1                 | Minimal (Updated references/sections with minimum text edits).  |
| 10.4.2      | Field Methods                           | 11.3.2                 | Minimal information remains in this Section and has been migrated to Appendix O.  |
| 10.4.2.1    | Equipment Preparation                   | 11.3.2.1               | Minimal information remains in this Section and has been migrated to Appendix O.  |
| 10.4.2.2    | Plot Location                           | 11.3.2.3               | Minimal information remains in this Section and has been migrated to Appendix O.  |
| 10.4.2.3    | Site Properties                         | N/A                    | Newly added section discussing field site properties data collected, addressing ITT comments. The majority of this information has been migrated to Appendix O.                           |
| 10.4.2.4    | Soil Properties                         | N/A                    | Newly added section discussing soil field data collected, addressing ITT comments. The majority of this information has been migrated to Appendix O.                                      |
| 10.4.2.5    | Vegetation Survey                       | 11.3.2.3               | Minimal information remains in this Section and has been migrated to Appendix O.  |
| 10.4.2.6    | Water Properties                        | 11.3.2.6               | Minimal information remains in this Section and has been migrated to Appendix O.  |
| 10.4.2.7    | Wildlife Observations                   | 11.3.2.5               | Minimal information remains in this Section and has been migrated to Appendix O.  |
| 10.4.2.8    | Functional Values                       | N/A                    | Newly added section outlining the evidence collected in the field to assess functional values, addressing ITT comments. The majority of this information has been migrated to Appendix O. |
| 10.4.3      | Re-evaluation of Wetland Function       | N/A                    | Newly added section discussing the use of monitoring field data to reassess wetland function, addressing ITT comments.  |



| H.1 Section | Section Title   | F.1 (Dec 2022) Section | Changes Since F.1 (Dec 2022)  |
|-------------|---|------------------------|---|
| 10.5        | Quality Assurance/Quality Control Process and Standards     | 11.3.3                 | Minimal (Updated references/sections with minimum text edits).  |
| 10.6        | Timing and Frequency  | 11.5                   | Updated to replace <i>early works</i> with the <i>commencement of restoration</i> , and updated references/sections with minimum text edits). |
| 10.7        | Follow-Up Program   | 11.6                   | Minimal (Updated references/sections with minimum text edits).  |
| 10.8        | Performance Standards                                       | 11.7                   | Minimal (Updated references/sections with minimum text edits).  |
| 11          | Evaluation and Adaptive Management                          | 12                     | Minimal (Updated references/sections with minimum text edits). Removed Trigger Action Response Plan.  |
| 11.1        | Analysis and Evaluation                                     | 12.1                   | Minimal (Updated references/sections with minimum text edits). Renamed Audits section from 2022 WMOP.   |
| 11.1.1      | Non-compliance and Corrective Action                        | 12.1.1                 | None.   |
| 12          | Documentation and Reporting                                 | 13                     | Minimal (Updated references/sections with minimum text edits).  |
| 12.1        | Documentation   | 13.1                   | None.   |
| 12.2        | Reporting   | 13.2                   | None.   |
| 12.2.1      | WMOP Annual Report  | 13.2.1                 | None.   |
| 12.2.2      | Decision Statement Annual Reporting and Information Sharing | 13.2.2                 | Minimal (Updated references/sections). Addition of DS Conditions 5.1, 5.2, 5.3, 5.4, 5.5.   |
| 12.2.3      | Environmental Assessment certificate Reporting              | 13.2.3                 | Minimal (Updated references/sections with minimum text edits).  |
| 13          | Plan Revision   | 14                     | Minimal (Updated references/sections with minimum text edits).  |
| 13.1        | Notification and Consultation Required Upon Plan Revision   | 14.1                   | Minimal (Updated references/sections with minimum text edits).  |
| 14          | Qualified Professionals                                     | 15                     | None.   |



| H.1 Section | Section Title   | F.1 (Dec 2022) Section | Changes Since F.1 (Dec 2022)   |
|-------------|---|------------------------|--|
| 15          | References  | 16                     | Updated references to reflect new information presented and information removed.   |
| Appendix A  | EAO Letters   | Appendix A             | Approval letter from February 14, 2023 added.  |
| Appendix B  | Concordance with Environmental Assessment Certificate #M1901 (June 21, 2019)                  | Appendix B             | Minimal (Updated references/sections to reflect current 2024 WMOP).  |
| Appendix C  | Concordance with Canadian Environmental Assessment Agency Decision Statement (April 15, 2019) | Appendix C             | Minimal (Updated references/sections to reflect current 2024 WMOP).  |
| Appendix D  | Wetland Baseline Sampling and Function Assessment Methodology                                 | Section 7; Section 8   | Information removed from 2022 WMOP Section 7 and Section 8, and made into an Appendix based on EAO comments in the Feb 14, 2023 letter; Contents edited based on updates to wetland accounting information.  |
| Appendix E  | Blackwater Gold Project Offset Alternatives Proposal  | N/A                    | New Appendix added to demonstrate consultation process to identify offsetting sites. Details are summarized in WMOP Section 7.1.5 and Section 9.5.   |
| Appendix F  | Wetland Functional Analysis   | Appendix I             | Table F-1 updated to include additional 125 wetland polygons mapped (937 wetlands vs. 812) combining offsetting sites and Project area polygons; losses pulled out to separate Table F-2 Project Area Loss for clarity to address ITT comments.  |
| Appendix G  | Ecologic 2022 Memorandum Regarding Wetland Survey Results                                     | Appendix D             | None.  |
| Appendix H  | Wetland Baseline Data   | Appendix E             | Table H-1 Plots updated based on more complete information (December 2022 version) provided by Ecologic January 2024 and performed spatial join with wetland polygons (plot type, Plot ID, Wetland ID updated); Updated column titles for Table H-2 vegetation cover descriptions addressing ITT comments; Added Tables H-5 Tree Attributes, G-6 CWD, G-7 Wetland Health Assessment, and G-8 Wildlife Incidental Observations to address ITT comments. |
| Appendix I  | Ecologic Listed Wetland 2022  | Appendix G             | None.  |



| H.1 Section | Section Title  | F.1 (Dec 2022) Section | Changes Since F.1 (Dec 2022)  |
|-------------|--|------------------------|---|
| Appendix J  | Wetlands Function Rubric and Function Calculation Spreadsheet (Score Card) | Appendix H             | Table J-1 Rubric methodology the same but additional info added for clarity on methodology, incorporating details on field data, sampling methodology, field data source and name (linking to Appendix G baseline data tables) to address ITT comments. |
| Appendix K  | Project Area Infrastructure Overlays on Wetland Maps                       | Appendix J             | Minimal (Updated to new ERM map template and displayed based on updated wetlands and footprint layer).  |
| Appendix L  | Predicted Project Area Wetland Losses at Year 23 Full Build-out            | N/A                    | New Appendix added to reflect updated methodology for wetland function loss to account for both direct loss (overlap) and indirect affect (see Section 7.4.1), to address ITT comments.   |
| Appendix M  | Actual (As-Built) Project Area Wetland Losses                              | N/A                    | New Appendix added for as-built wetland losses.   |
| Appendix N  | 2024 WMOP Information Track Table  | Appendix L             | Updated ITT responses based on 2024 WMOP updates.   |
| Appendix O  | Wetland Monitoring Supporting Information and Field Forms                  | Appendix M             | Updated based on updated monitoring methodology (Section 10); updated field forms to most up to date versions and include Wetland Habitat Information Form.   |
| Appendix P  | Wetlands Mitigation and Management Measures                                | Section 9              | Additional columns added to identify concordance with EAC #M19-01 Permit Conditions and CEAA DS.  |
| Appendix Q  | Offsetting Site Land Securement Maps                                       | Appendix K             | None.   |
| Appendix R  | Piezometer Installation and Monitoring (Palmer 2021)                       | Appendix F             | None.   |