



## **PLAIN LANGUAGE SUMMARY FOR TRANSLATION - INUKTITUK**

### **LUPIN MINE POND 2 DISCHARGE VARIANCE REQUEST**

#### **INTRODUCTION**

Lupin Mines Incorporated (LMI) is a wholly owned, indirect subsidiary of Alkane Resources Ltd. (Alkane) (previously Mandalay Resources Corporation). The Lupin Mine (the Mine), located in the Kitikmeot Region of Nunavut, is currently in a state of Care and Maintenance. Closure activities are guided by the 2018 Final Closure and Reclamation Plan (FCRP) and conditions of Water License 2AM-LUP2032 (the Water License). LMI is committed to meeting timelines and objectives to achieve final closure of the Mine. Significant reclamation and closure works are planned for the summer and early fall of 2026.

During the Mine's operation, the historic tailings containment area (Pond 2) was the permitted location for tailings discharge from the Mine. The FCRP requires the water to be discharged from Pond 2 to achieve final closure objectives.

The Water Licence allows for a discharge volume of 125,000 m<sup>3</sup>/day, commencing on, or after July 15 of the current year. Discharge is permitted provided water quality parameters are met and adequate notification is given to the Nunavut Water Board. Based on current scheduling for the 2026 season and the total volume of water in Pond 2, initiating discharge only after July 15 poses a substantive threat to project timelines, given the short operating season.

#### **CLOSURE OBJECTIVES**

Decanting Pond 2 allows for the following closure objectives to be met:

- Expose and dry tailings prior to heavy equipment mobilization to reduce geotechnical risk and support successful cover placement and achieve final reclamation objectives;
- Allow safe access for heavy equipment to place rock cover on the tailings;
- Facilitate grading, armouring, and other final closure works in accordance with the FCRP.

Discharge from Pond 2 will be monitored. Flow meters are already installed on the siphons and will be used to measure discharge rates to control and modulate flows from Pond 2 in a safe and predictable manner.

#### **REQUEST**

To facilitate project success, LMI is formally requesting to begin discharging this Pond 2 on June 15, 2026. All discharge quality requirements and limits, as listed in the Water License will still apply.



### **ENVIRONMENTAL MONITORING**

At the recommendation of the Department of Fisheries and Oceans (DFO), LMI and SLR Consulting (SLR) have completed a Request for Review (RFR), outlining monitoring and mitigative measures that will be followed to ensure the protection of fish and fish habitat during this early discharge period. The RFR requests that the discharge period begins on June 15 to allow for ice-free conditions and the implementation of monitoring and protective measures in the receiving environment, during the Nunavut restricted activity timing window for spring spawning fish (e.g. Arctic Grayling) from May 1 to July 15. The approval of the RFR is required prior to commencing with the proposed early June 15 discharge date.

### **CLOSING**

The requested discharge timing change is necessary to support the 2026 closure workplan and the safe exposure of tailings for cover placement and other Mine site activities. LMI confirms that the pumping of the water will be supported by compliant water samples and a dedicated monitoring program.

LMI respectfully requests that the Nunavut Water Board and Kugluktuk consider this variance application.



