

APPENDIX C.1.6
2025 Borrow Pit Reclamation Report



Mary River Project
2025 Borrow Pit Reclamation Report

Baffinland Iron Mines Corporation
Mary River Project

Issue Date: October 28, 2025

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1.0 Introduction

In the summer of 2025, Baffinland completed reclamation activities of four borrow pit areas (Site 14, Site 14A Site 41, and Site 71) along the Milne Inlet Tote Road, representing a reclamation area of 22,702 m² (Table 1). This memorandum documents the completed activities and compiles all relevant as-built information. The work was undertaken in alignment with Baffinland’s Interim Closure and Reclamation Plan Revision 6 (the ICRP), which establishes closure objectives for borrow pits, namely to:

- Ensure physically stable disturbed areas to minimize the risk of failure that could impact human safety or the surrounding environment;
- Re-establish natural drainage pathways wherever possible.

The reclamation of these borrow pits was planned and executed to meet these closure objectives and in accordance with applicable regulatory requirements and environmental protection commitments.

Table 1: Summary of 2025 Borrow Pit Reclamation

Borrow Pit ID	Location	Area Reclaimed (m ²)
14	Km 89.3	7,475
14A	Km 89.6	6,540
41	Km 50.6	4,400
71	Km 20.5	4,290
Total		22,705

2.0 Regulatory and environmental context

Closure and reclamation activities at each borrow pit was undertaken in consideration of:

- Water Licence requirements pertaining to site stability, sedimentation and erosion control, and protection of surface waters
- Commitments outlined in the ICRP Revision 6
- Site environmental management procedures, specifically in relation to wildlife protection and water management.

These measures are intended to comply with federal and territorial environmental legislation and support progressive reclamation objectives for the project.

3.0 Site 14 and Site 14A Reclamation

3.1 Site Characterization

Site 14 and 14A are located at chainage 89+300 and 89+800 respectively, both on the west side of the Tote Road. Its location is shown in the figure provided in Appendix A (TetraTech, 2025). This borrow pit was originally developed as a resource for aggregate to support road construction. During pre-reclamation inspections, water ponding was observed in the borrow pit during the freshet period, but it typically disappears by summer. Cracking was also noted, indicating a need for regrading to improve drainage.

3.2 Reclamation Activities

Prior to initiating reclamation, the areas for required for excavation and resloping was staked by the Technical Services Department, to minimize the disturbance area as outlined in Baffinland's Environmental Protection Plan (EPP) (Baffinland, 2021). The work was completed outside the bird nesting window there fore no bird survey was required.

No water management was required for reclamation as there was no pooling of water within the borrow pit at the time the work was done.

Reclamation activities were carried out between Septembet 10 and September 25. The scope of activities included the following:

- A cut-and-fill regrading method, implemented using a CAT D6 dozer, 988 loader and two 745 Articulated Rock Truck to eliminate ponding areas and re-establish proper surface drainage, consistent with surrounding topography
- Restoration of site geotechnical stability through the creation of a gently sloped, stable landform to prevent erosion and settlement.

The total area reclaimed is approximately 7,475 m² at Site 14 and 6,540 m² at Site 14A. Photos of the reclamation activities and post-reclamation status are provided in Appendix B1. An overview drone image was unable to be conducted due to snow cover.

3.3 Post-Reclamation Activity

To verify reclamation success and compliance with closure objectives, the borrow pit will be inspected in 2026, and a drone survey will be conducted to assess whether any significant settlement has occurred. If notable settlement is identified, corrective measures will be implemented.

The outcomes of the 2025 reclamation work have been evaluated against the closure objectives outlined in the ICRP. A summary of compliance with each objective is provided in Table 2. This table demonstrates that the reclamation of Site 14 and 14A has met all applicable closure objectives and regulatory requirements, subject to confirmation during the 2026 monitoring inspection.

If no deficiencies are observed, the borrow pit will be deemed to have met reclamation objectives, and no further actions will be required.

Table 2: Closure Criteria Compliance for Site 14 and Site 14A

Closure Objective	Criteria for Success	Evidence of Reclamation	Compliance Status
Ensure physically stable disturbed areas to minimize the risk of failure that could impact human safety or the surrounding environment.	Stable side slopes and pit floor with no evidence of erosion, slumping, or settlement.	Cult and fill regrading completed in September 2025	Achieved (subject to 2026 inspection)
Re-establish natural drainage pathways wherever possible.	No long-term ponding or impediments to surface water flow	Depressions regraded to restore positive drainage.	Achieved (subject to 2026 inspection)
	Accumulated water removed prior to regrading.	Post-activity inspection confirmed absence of standing water.	
Protect environment during reclamation	Wildlife and water management procedures followed	Technical Services Department staking to minimize the impacted area	Achieved
Facilitate progressive reclamation and support closure planning	Demonstrated successful implementation of interim closure activities consistent with ICRP Revision 6	Reclamation completed in accordance with Interim Closure and Reclamation Plan (Rev. 6).	Achieved
		Documentation compiled for regulatory reporting and compliance tracking.	

3.4 Conclusion

The reclamation of Site 14 and Site 14A was successfully completed in September 2025 in accordance with the ICRP and relevant regulatory requirements. The work addressed key closure objectives by restoring stable landforms, re-establishing natural drainage, and protecting environmental resources during implementation.

The Closure Criteria Compliance Table confirms that all closure objectives were met, with post-reclamation monitoring scheduled for 2026 to verify long-term stability and drainage performance. Subject to this follow-up inspection, Site 14 and Site 14A is expected to be deemed successfully remediated, contributing to the progressive closure of project infrastructure and supporting overall environmental compliance.

4.0 Site 41 Reclamation

4.1 Site Characterization

Site 41 is located at chainage 50+600, on the west side of the Tote Road. Its location is shown in the figure provided in Appendix A (TetraTech, 2025). This borrow pit was originally developed as a resource for aggregate to support road construction. During pre-reclamation inspections, water ponding was observed in the borrow pit during the freshet period, but it typically disappears by summer. Cracking was also noted, indicating a need for regrading to improve drainage.

4.2 Reclamation Activities

Prior to initiating reclamation, a bird survey was conducted by the Environmental Department, in accordance with the bird protection measures outlined in Baffinland's Environmental Protection Plan (EPP) (Baffinland, 2021). This survey confirmed the absence of active nests within the work area.

No water management was required for reclamation as there was no pooling of water within the borrow pit at the time the work was done.

Reclamation activities were carried out on August 18. The scope of activities included the following:

- Area re-shaped to allow slight slope to eliminate water pooling in borrow pit area and shed water during rain events and freshet. No addition material required. implemented using a Cat D6 dozer.
- Restoration of site geotechnical stability through the creation of a gently sloped, stable landform to prevent erosion and settlement.

The total area reclaimed is approximately 4,400m². Photos of the reclamation activities and post-reclamation status are provided in Appendix C1. An overview drone image is provided in the Appendix C2, illustrating the pre- and post-reclamation conditions of the borrow pit.

4.3 Post-Reclamation Activity

To verify reclamation success and compliance with closure objectives, the borrow pit will be inspected in 2026, and a drone survey will be conducted to assess whether any significant settlement has occurred. If notable settlement is identified, corrective measures will be implemented.

The outcomes of the 2025 reclamation work have been evaluated against the closure objectives outlined in the ICRP. A summary of compliance with each objective is provided in Table 3. This table demonstrates that the reclamation of Site 41 has met all applicable closure objectives and regulatory requirements, subject to confirmation during the 2026 monitoring inspection.

If no deficiencies are observed in 2026, the borrow pit will be deemed to have met reclamation objectives, and no further actions will be required.

Table 3: Closure Criteria Compliance for Site 41

Closure Objective	Criteria for Success	Evidence of Reclamation	Compliance Status
Ensure physically stable disturbed areas to minimize the risk of failure that could impact human safety or the surrounding environment.	Stable side slopes and pit floor with no evidence of erosion, slumping, or settlement.	Cult and fill regrading completed in August 2025	Achieved (subject to 2026 inspection)
	Gently sloped, stable landform created.	Drone imagery	
Re-establish natural drainage pathways wherever possible.	No long-term ponding or impediments to surface water flow	Depressions regraded to restore positive drainage.	Achieved (subject to 2026 inspection)
	Accumulated water removed prior to regrading.	Post-activity inspection confirmed absence of standing water.	
Protect environment during reclamation	Wildlife and water management procedures followed	Bird nest survey conducted (per approved procedure) confirmed absence of nests.	Achieved
Facilitate progressive reclamation and support closure planning	Demonstrated successful implementation of interim closure activities consistent with ICRP Revision 6	Reclamation completed in accordance with Interim Closure and Reclamation Plan (Rev. 6).	Achieved
		Documentation compiled for regulatory reporting and compliance tracking.	

4.4 Conclusion

The reclamation of Site 41 was successfully completed in August 2025 in accordance with the ICRP and relevant regulatory requirements. The work addressed key closure objectives by restoring stable landforms, re-establishing natural drainage, and protecting environmental resources during implementation.

The Closure Criteria Compliance Table confirms that all closure objectives were met, with post-reclamation monitoring scheduled for 2026 to verify long-term stability and drainage performance. Subject to this follow-up inspection, Site 41 is expected to be deemed successfully remediated, contributing to the progressive closure of project infrastructure and supporting overall environmental compliance.

5.0 Site 71 Reclamation

5.1 Site Characterization

Site 71 is located between chainage 20+500 and 21+000, on the west side of the Tote Road. Its location is shown in the figure provided in Appendix A (TetraTech, 2025). This borrow pit was originally developed as a resource for aggregate to support road construction. At this location, there is a steep and high roadway embankment. During pre-reclamation inspections, water ponding was observed within the borrow pit, indicating the need for re-grading to promote drainage.

5.2 Reclamation Activities

Prior to initiating reclamation, a bird survey was conducted by the Environmental Department, in accordance with the bird protection measures outlined in Baffinland's Environmental Protection Plan (EPP) (Baffinland, 2021). This survey confirmed the absence of active nests within the work area.

To enable safe access and equipment operation, accumulated water was sampled for quality assurance purposes, then pumped to the adjacent tundra in a controlled manner. This activity was conducted in accordance with water management and sediment and erosion control measures outlined in Baffinland's EPP to minimize environmental effects. and subsequently pumped onto the surrounding tundra to provide a dry working surface.

Reclamation activities were carried out between July 20 and July 25. The scope of activities included the following:

- A cut-and-fill regrading method, implemented using a CAT D6 dozer to eliminate ponding areas and re-establish proper surface drainage, consistent with surrounding topography
- Restoration of site geotechnical stability through the creation of a gently sloped, stable landform to prevent erosion and settlement.

The total area reclaimed is approximately 4,290 m². Photos of the reclamation activities and post-reclamation status are provided in Appendix B. An overview drone image is provided in the Appendix C, illustrating the pre- and post-reclamation conditions of the borrow pit.

5.3 Post-Reclamation Activity

To verify reclamation success and compliance with closure objectives, the borrow pit will be inspected in 2026, and a drone survey will be conducted to assess whether any significant settlement has occurred. If notable settlement is identified, corrective measures will be implemented.

The outcomes of the 2025 reclamation work have been evaluated against the closure objectives outlined in the ICRP. A summary of compliance with each objective is provided in Table 4. This table demonstrates that the reclamation of Site 71 has met all applicable closure objectives and regulatory requirements, subject to confirmation during the 2026 monitoring inspection.

If no deficiencies are observed, the borrow pit will be deemed to have met reclamation objectives, and no further actions will be required.

Table 4: Closure Criteria Compliance for Site 71

Closure Objective	Criteria for Success	Evidence of Reclamation	Compliance Status
Ensure physically stable disturbed areas to minimize the risk of failure that could impact human safety or the surrounding environment.	Stable side slopes and pit floor with no evidence of erosion, slumping, or settlement.	Cult and fill regrading completed in July 2025	Achieved (subject to 2026 inspection)
	Gently sloped, stable landform created.	Drone imagery	
Re-establish natural drainage pathways wherever possible.	No long-term ponding or impediments to surface water flow	Depressions regraded to restore positive drainage.	Achieved (subject to 2026 inspection)
	Accumulated water removed prior to regrading.	Post-activity inspection confirmed absence of standing water.	
Protect environment during reclamation	Wildlife and water management procedures followed	Bird nest survey conducted (per approved procedure) confirmed absence of nests.	Achieved
		Accumulated water sampled and discharged to tundra under controlled conditions.	
Facilitate progressive reclamation and support closure planning	Demonstrated successful implementation of interim closure activities consistent with ICRP Revision 6	Reclamation completed in accordance with Interim Closure and Reclamation Plan (Rev. 6).	Achieved
		Documentation compiled for regulatory reporting and compliance tracking.	

5.4 Conclusion

The reclamation of Site 71 was successfully completed in July 2025 in accordance with the ICRP and relevant regulatory requirements. The work addressed key closure objectives by restoring stable landforms, re-establishing natural drainage, and protecting environmental resources during implementation.

The Closure Criteria Compliance Table confirms that all closure objectives were met, with post-reclamation monitoring scheduled for 2026 to verify long-term stability and drainage performance. Subject to this follow-up inspection, Site 71 is expected to be deemed successfully remediated, contributing to the progressive closure of project infrastructure and supporting overall environmental compliance.

6.0 Conclusion

The 2025 borrow pit reclamation program successfully advanced Baffinland's progressive closure objectives for the Mary River Project. Reclamation was completed at Sites 14, 14A, 41, and 71, encompassing a total area of approximately 22,700 m². Activities were undertaken in accordance with the Interim Closure and Reclamation Plan (Revision 6) and the Environmental Protection Plan, ensuring compliance with regulatory requirements and environmental protection commitments.

Each site was regraded to restore natural drainage, stabilize landforms, and minimize long-term erosion potential. Environmental protection measures, such as wildlife surveys, controlled water management, and minimized disturbance, were applied throughout the progressive reclamation activities.

Post-reclamation inspections and drone surveys planned for 2026 will confirm long-term stability and drainage performance. Subject to successful verification, the reclaimed sites will be considered fully closed, representing an important step toward progressive reclamation and environmental stewardship at the Mary River Project.

References

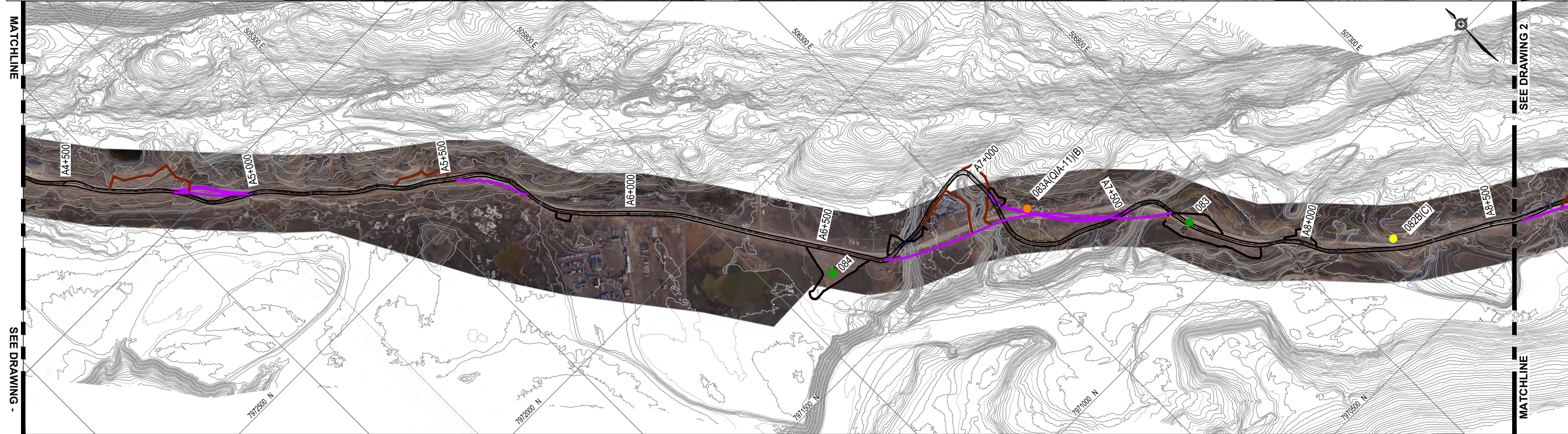
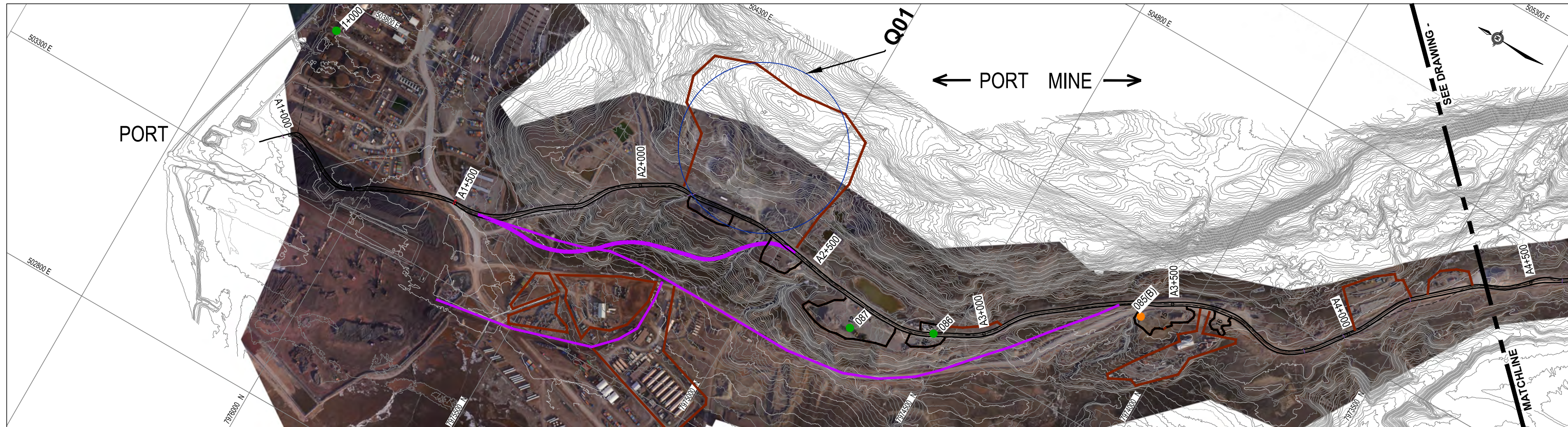
Baffinland Iron Mines Corporation, 2025. Interim Closure and Reclamation Plan, Revision 6. BIM-5200-PLA-0026

Baffinland Iron Mine Corporation, 2021. Environmental Protection Plan, Revision 2. BIM-5200-PLA-003

TetraTech. 2025. 2023 Inspection of the Milne Inlet Tote Road – Associated Borrow Sources.
File: 704-ENG.EARC03209-12.

Appendix A: Borrow Pit Locations (TetraTech, 2025)

Q:\Edmonton\Engineering\1411\Projects\704-ENG.EARC03209-12-Tote Road\Drawings_DS\Mary River Tote Road\141704-ENG.EARC03209-14-Figures-IFR.dwg [FIGURE 1] July 17, 2024 - 8:54:53 am (BY: SOSNIUK, DEVON)

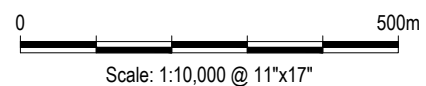


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- - REMEDIATION LOCATIONS FOR SITES A+ AND A
 - - REMEDIATION LOCATIONS FOR SITES B
 - - REMEDIATION LOCATIONS FOR SITES C
 - - PREVIOUSLY REMEDIATED SITE (NO ACTION REQUIRED)
 - - QUARRY LOCATIONS
 - APPROXIMATE EXTENT OF BORROW AND LAYDOWN LOCATIONS
 - APPROXIMATE ROAD REALIGNMENT
 - HISTORIC ORIGINAL ALIGNMENTS NOT USED

- QIA - QIKIQITANI INUIT ASSOCIATION CONCERNS
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NOTES
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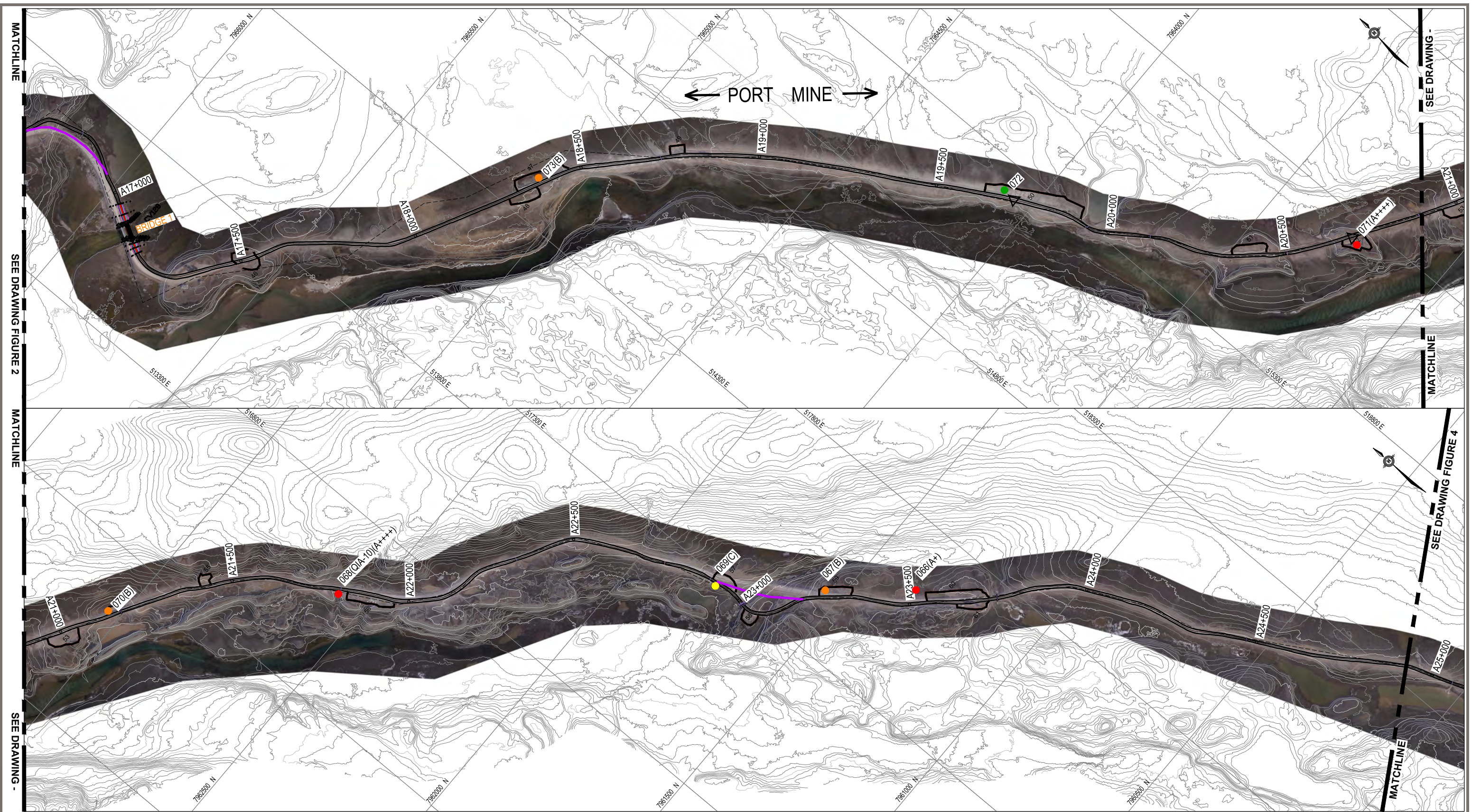


**Tote Road Multi-Year Remediation Plan
 Mary River, Baffin Island**

**AREA OF CONCERN LOCATIONS
 SHEET 1 OF 13**

PROJECT NO. ENG.EARC03209-14	DWN DS	CKD MH	REV 0	Figure 1
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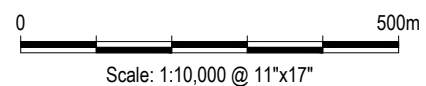


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 - - REMEDIATION LOCATIONS FOR SITES B
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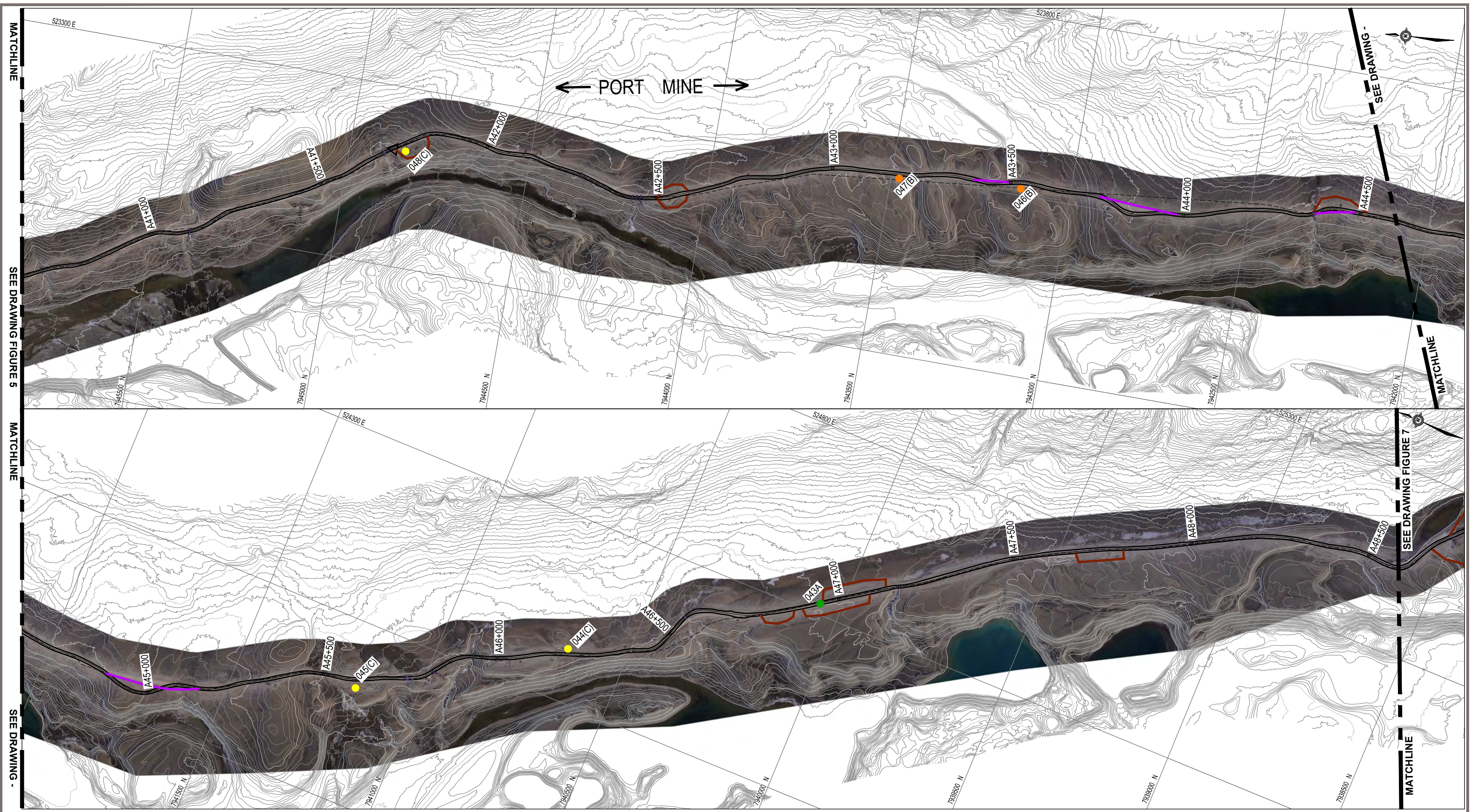
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Tote Road Multi-Year Remediation Plan Mary River, Baffin Island				
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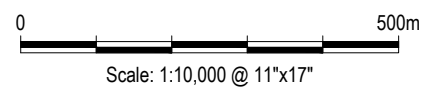


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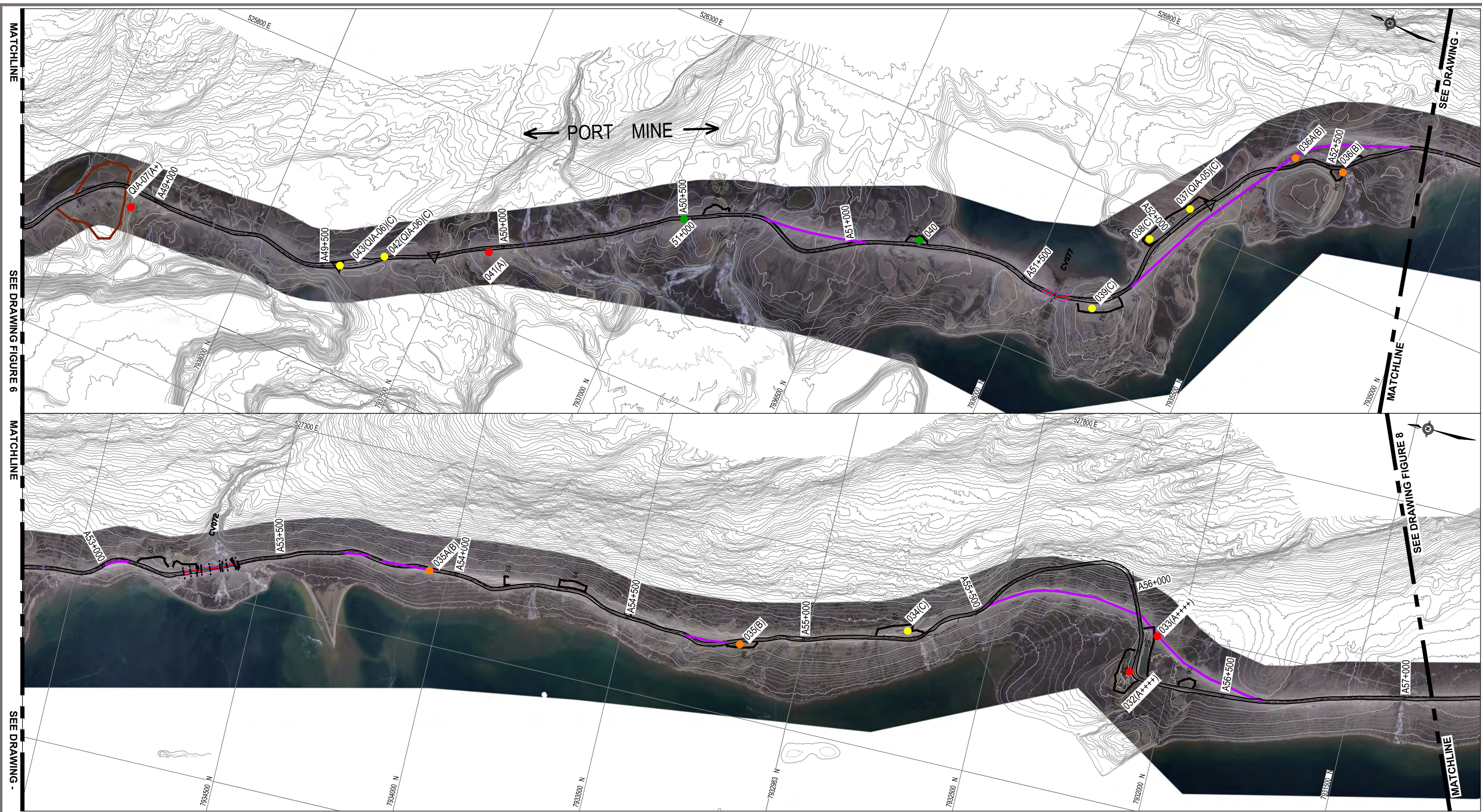
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**Tote Road Multi-Year Remediation Plan
Mary River, Baffin Island**

**AREA OF CONCERN LOCATIONS
SHEET 6 OF 13**

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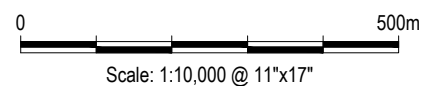


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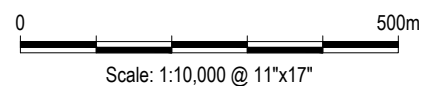


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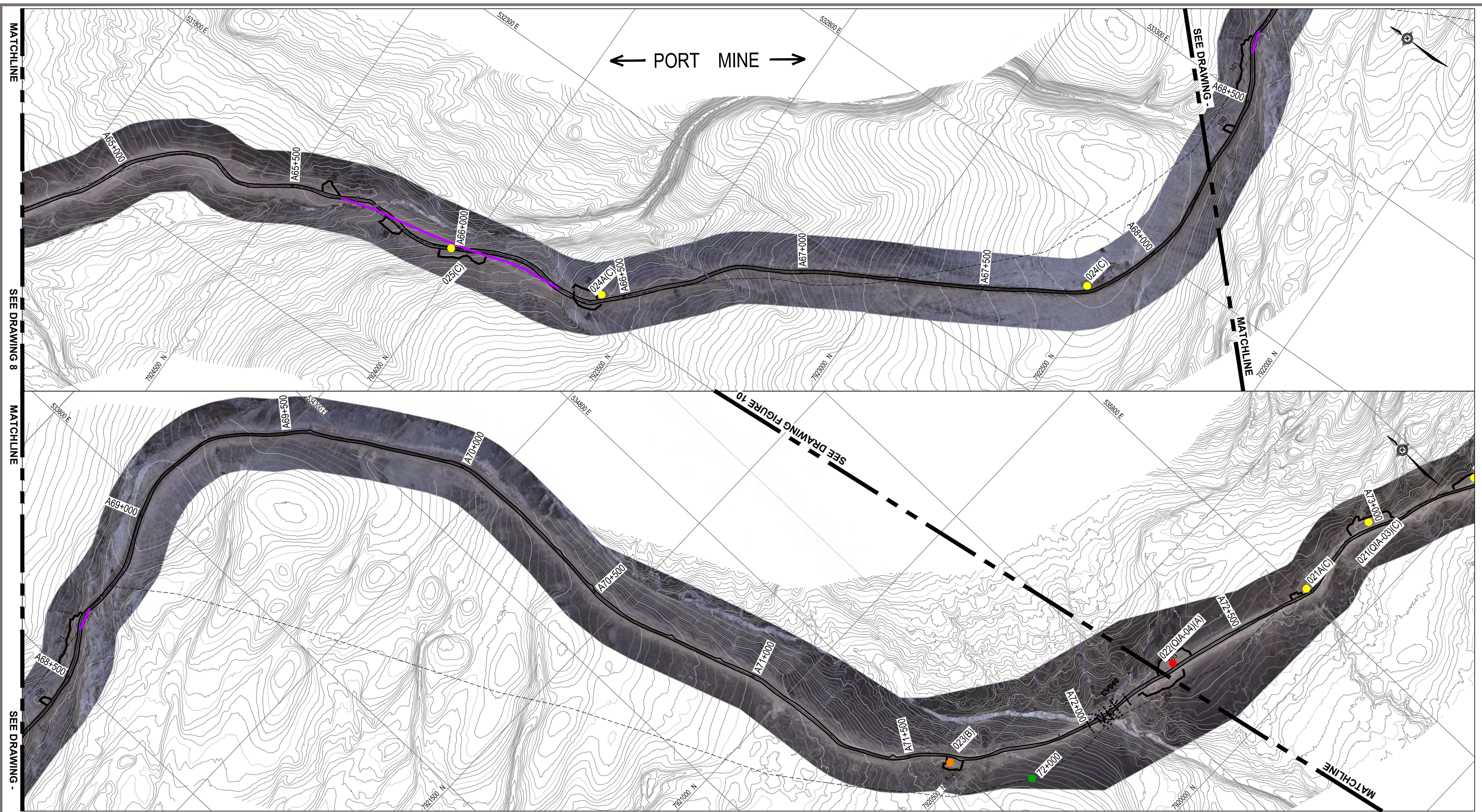
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Tote Road Multi-Year Remediation Plan Mary River, Baffin Island				
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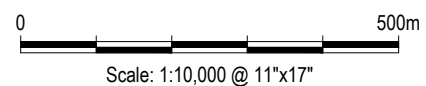
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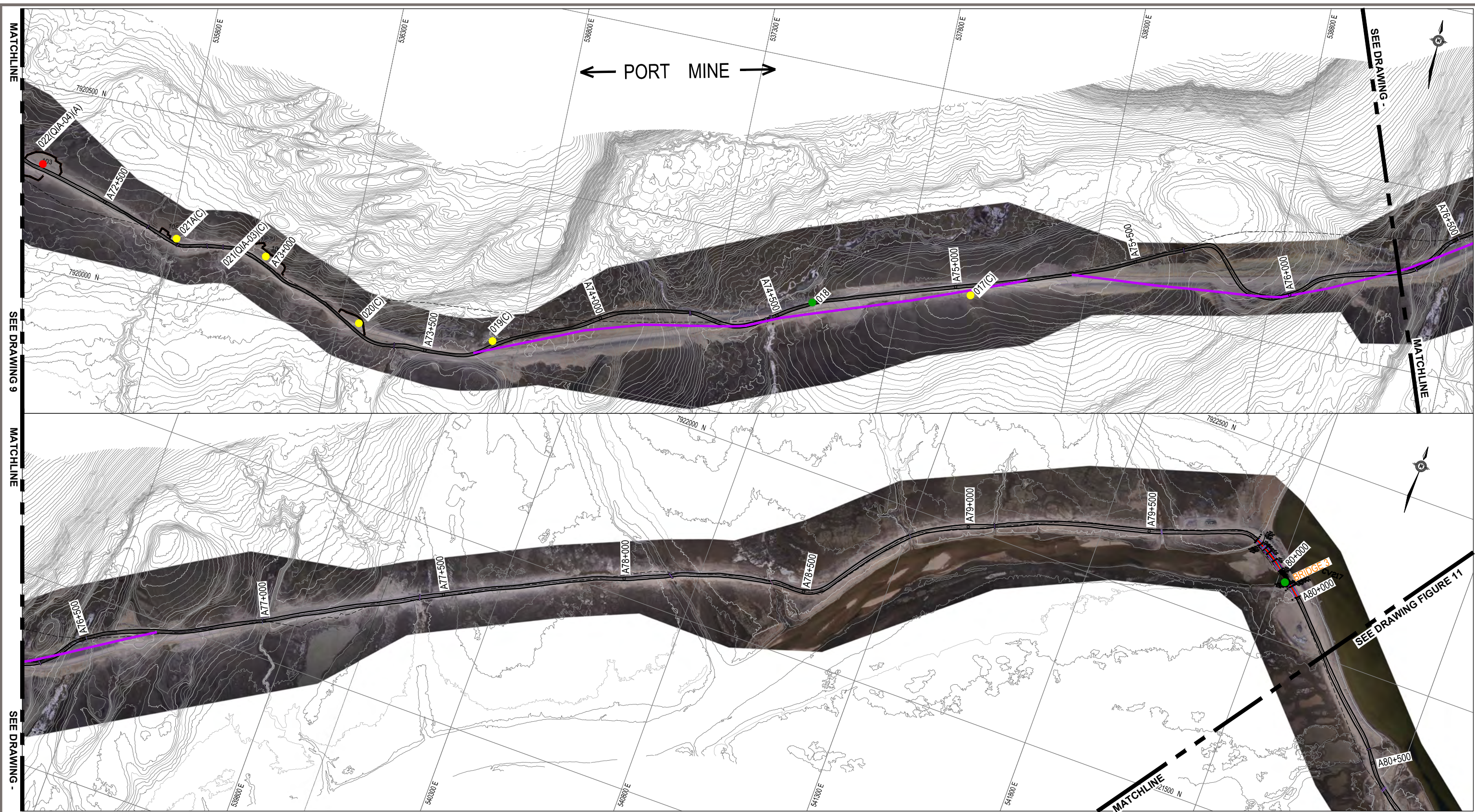
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Tote Road Multi-Year Remediation Plan Mary River, Baffin Island			
AREA OF CONCERN LOCATIONS SHEET 9 OF 13			
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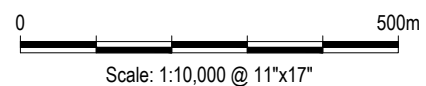


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 BAFFINLAND IRON MINES CORPORATION
 BASE DATA: 1:10 000

ISSUED FOR REVIEW

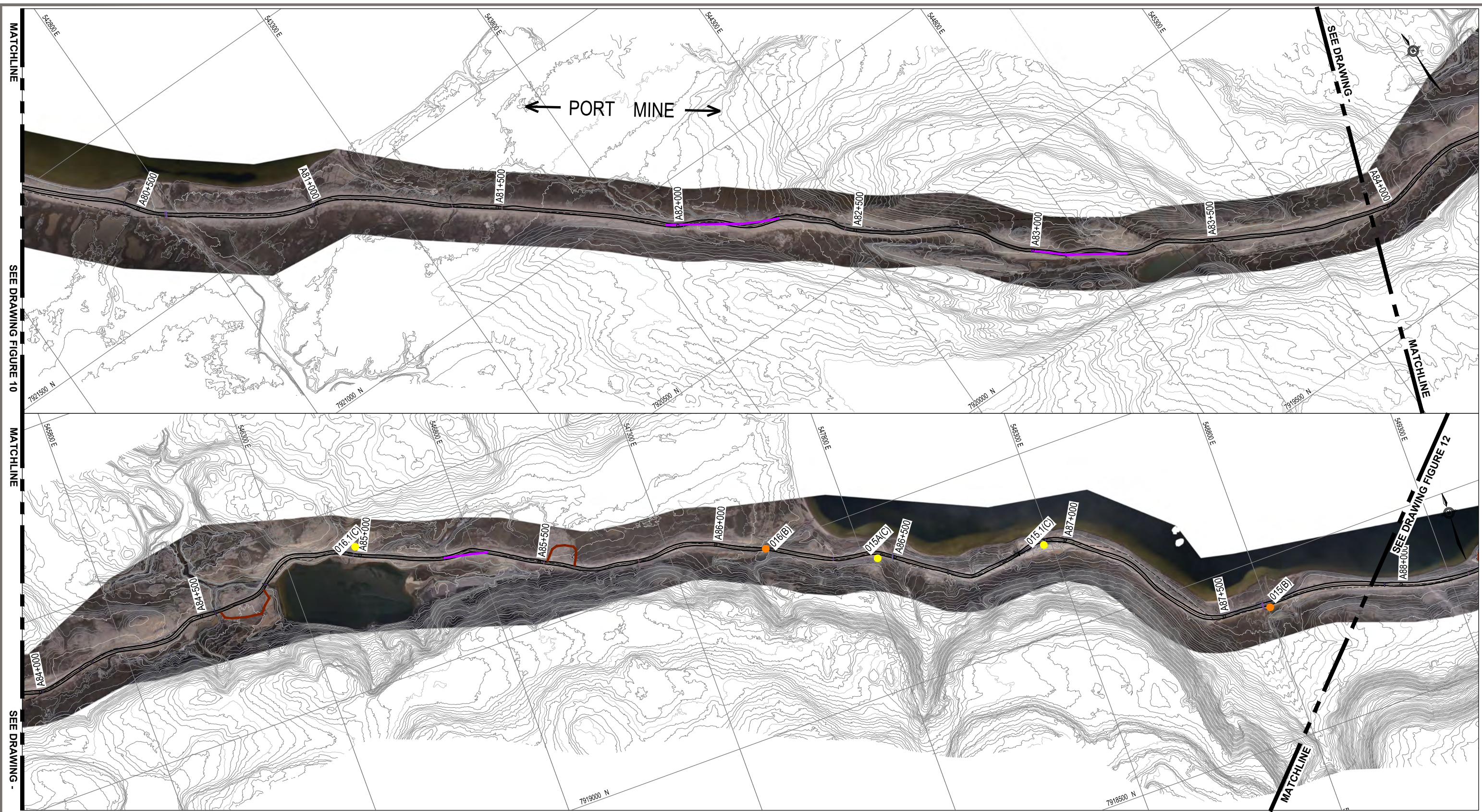


**Tote Road Multi-Year Remediation Plan
 Mary River, Baffin Island**

**AREA OF CONCERN LOCATIONS
 SHEET 10 OF 13**

PROJECT NO. ENG.EARC03209-14	DWN DS	CKD MH	REV 0	Figure 10
OFFICE EDM	DATE July 2024			

Q:\Edmonton\Engineering\141\Projects\704-ENG.EARC03209-Baffinland\704-ENG.EARC03209-12-Tote Road\Drawings_DS\Mary River Tote Road\Drawings-14-Figures-IFR.dwg [FIGURE 11] July 17, 2024 - 10:53:23 am (BY: SOSNIUK, DEVON)

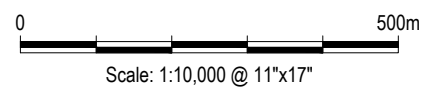


- LEGEND:**
- - REMEDIATION LOCATIONS FOR SITES A++++, A+ AND A
 - - REMEDIATION LOCATIONS FOR SITES B
 - - REMEDIATION LOCATIONS FOR SITES C
 - - PREVIOUSLY REMEDIATED SITE (NO ACTION REQUIRED)
 - - QUARRY LOCATIONS
 - APPROXIMATE EXTENT OF BORROW AND LAYDOWN LOCATIONS
 - APPROXIMATE ROAD REALIGNMENT
 - HISTORIC ORIGINAL ALIGNMENTS NOT USED

- QIA - QIKIQITANI INUIT ASSOCIATION CONCERNS
- NIRB - NUNAVUT IMPACT REVIEW BOARD CONCERNS

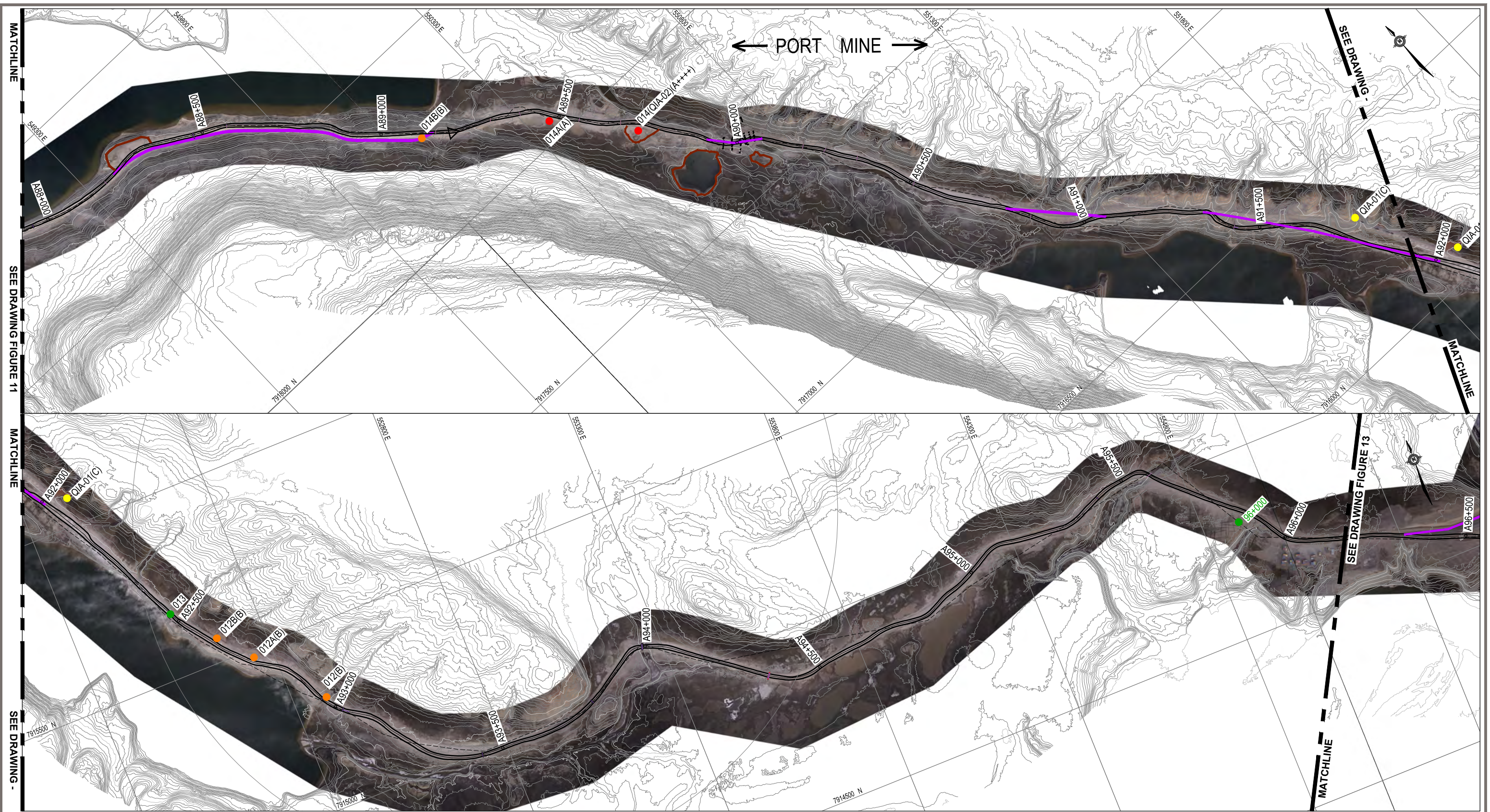
NOTES
 BASED ON DRAWING DATA PROVIDED BY
 BAFFINLAND IRON MINES CORPORATION
 BASE DATA: 1:10 000

ISSUED FOR REVIEW



Tote Road Multi-Year Remediation Plan Mary River, Baffin Island			
AREA OF CONCERN LOCATIONS SHEET 11 OF 13			
PROJECT NO. ENG.EARC03209-14	DWN DS	CKD MH	REV 0
OFFICE EDM	DATE July 2024		Figure 11

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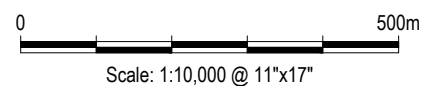


- LEGEND:**
- - REMEDIATION LOCATIONS FOR SITES A++++, A+ AND A
 - - REMEDIATION LOCATIONS FOR SITES B
 - - REMEDIATION LOCATIONS FOR SITES C
 - - PREVIOUSLY REMEDIATED SITE (NO ACTION REQUIRED)
 - - QUARRY LOCATIONS
 - APPROXIMATE EXTENT OF BORROW AND LAYDOWN LOCATIONS
 - APPROXIMATE ROAD REALIGNMENT
 - HISTORIC ORIGINAL ALIGNMENTS NOT USED

QIA - QIKIQITANI INUIT ASSOCIATION CONCERNS
 NIRB - NUNAVUT IMPACT REVIEW BOARD CONCERNS

NOTES
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Tote Road Multi-Year Remediation Plan Mary River, Baffin Island				
AREA OF CONCERN LOCATIONS SHEET 12 OF 13				
PROJECT NO. ENG.EARC03209-14	DWN DS	CKD MH	REV 0	Figure 12
OFFICE EDM	DATE July 2024			

Q:\Edmonton\Engineering\141\Projects\704-ENG.EARC03209-Baffinland\704-ENG.EARC03209-12-Tote RoadDrawings_DSMary River Tote Road\Drawings - DSMary River Tote Road\Drawings-IFR.dwg [FIGURE 13] July 17, 2024 - 10:59:35 am (BY: SOSNIUK, DEVON)

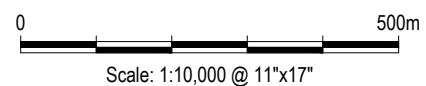


- LEGEND:**
- - REMEDIATION LOCATIONS FOR SITES A++++, A+ AND A
 - - REMEDIATION LOCATIONS FOR SITES B
 - - REMEDIATION LOCATIONS FOR SITES C
 - - PREVIOUSLY REMEDIATED SITE (NO ACTION REQUIRED)
 - - QUARRY LOCATIONS
 - APPROXIMATE EXTENT OF BORROW AND LAYDOWN LOCATIONS
 - APPROXIMATE ROAD REALIGNMENT
 - HISTORIC ORIGINAL ALIGNMENTS NOT USED

- QIA - QIKIQITANI INUIT ASSOCIATION CONCERNS
- NIRB - NUNAVUT IMPACT REVIEW BOARD CONCERNS

NOTES
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Tote Road Multi-Year Remediation Plan Mary River, Baffin Island				
AREA OF CONCERN LOCATIONS SHEET 13 OF 13				
PROJECT NO. ENG.EARC03209-14	DWN DS	CKD MH	REV 0	Figure 13
OFFICE EDM	DATE July 2024			

Appendix B1: Site 14 and Site 14A Reclamation Photos



Figure B1. Site 14A during freshet, July 2025



Figure B2. Site 14A during freshet, July 2025



Figure B3. Site 14 and Site 14A after Reclamation Work, September 2025



Figure B4. Site 14 and Site 14A after Reclamation Work, September 2025



Figure B5. Site 14 and Site 14A after Reclamation Work, September 2025

Appendix C1: Site 41 Reclamation Photos



Figure C1. Regrading of Borrow Pit 41 using a CAT D6 dozer, August 2025

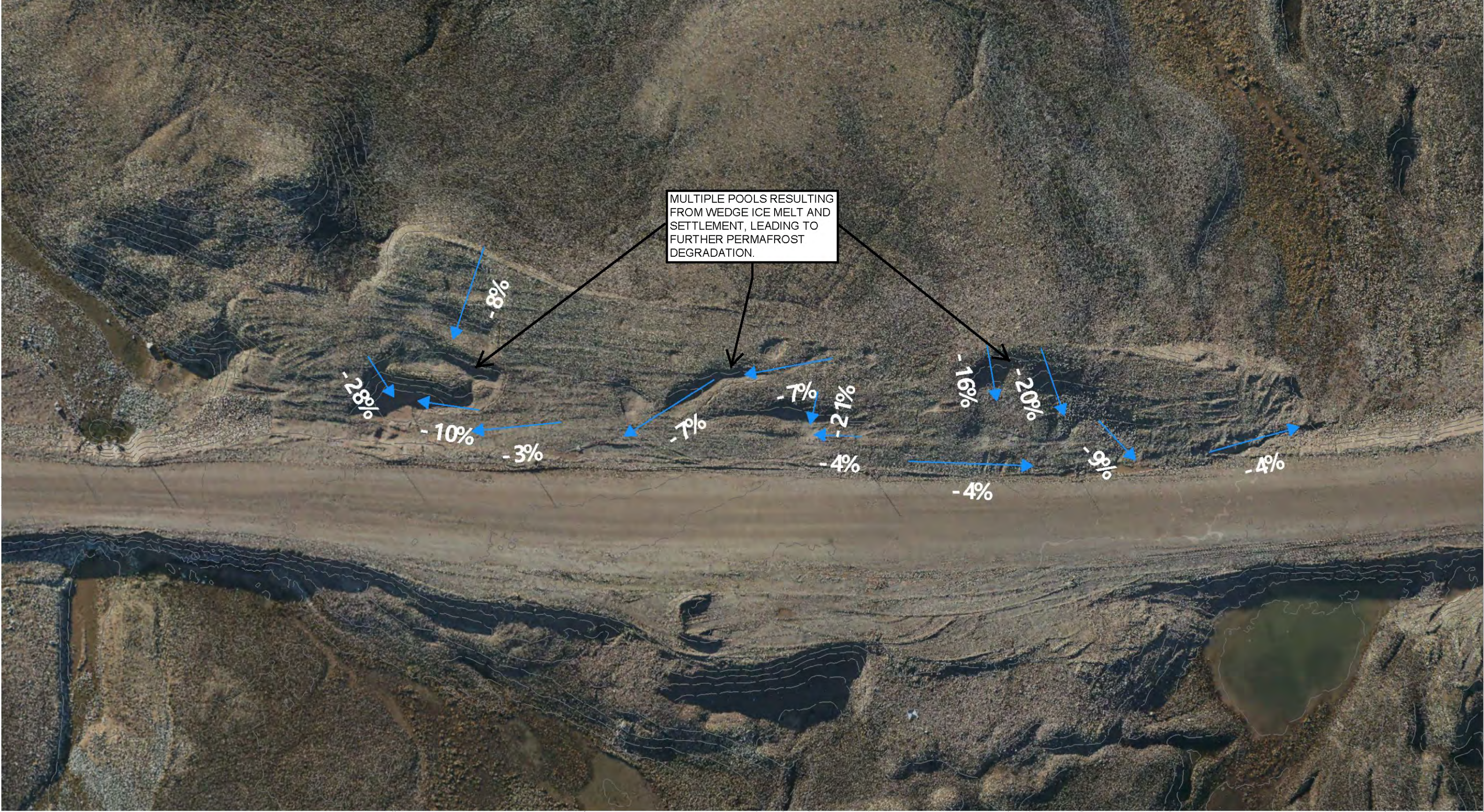


Figure C2. Post-reclamation site, surface grading, August 2025



Figure C3. Post-reclamation site, surface grading, August 2025

Appendix C2: Drone Imagery Pre and Post Reclamation Conditions of Site 41



MULTIPLE POOLS RESULTING FROM WEDGE ICE MELT AND SETTLEMENT, LEADING TO FURTHER PERMAFROST DEGRADATION.

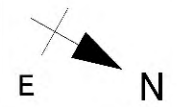


PROJECT: PIT 41 REMEDIATION KM50

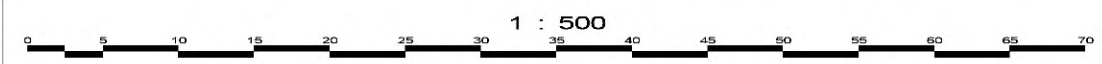
DATE: 2025-09-12

LEGEND

0.5m CONTOUR
FLOW PATH



NOTES: SEPTEMBER 2024 BEFORE REMEDIATION



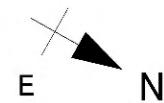


PROJECT: PIT 41 REMEDIATION KM50

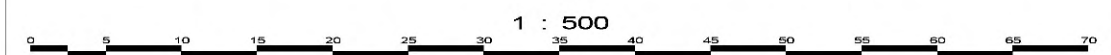
DATE: 2025-09-12

LEGEND

0.5m CONTOUR
FLOW PATH



NOTES: AUGUST 2025 REMEDIATION



Appendix D1: Site 71 Reclamation Photos



Figure D1. Regrading of Borrow Pit 71 using a CAT D6 dozer, July 2025



Figure D2. Regrading of Borrow Pit 71 using a CAT D6 dozer, July 2025

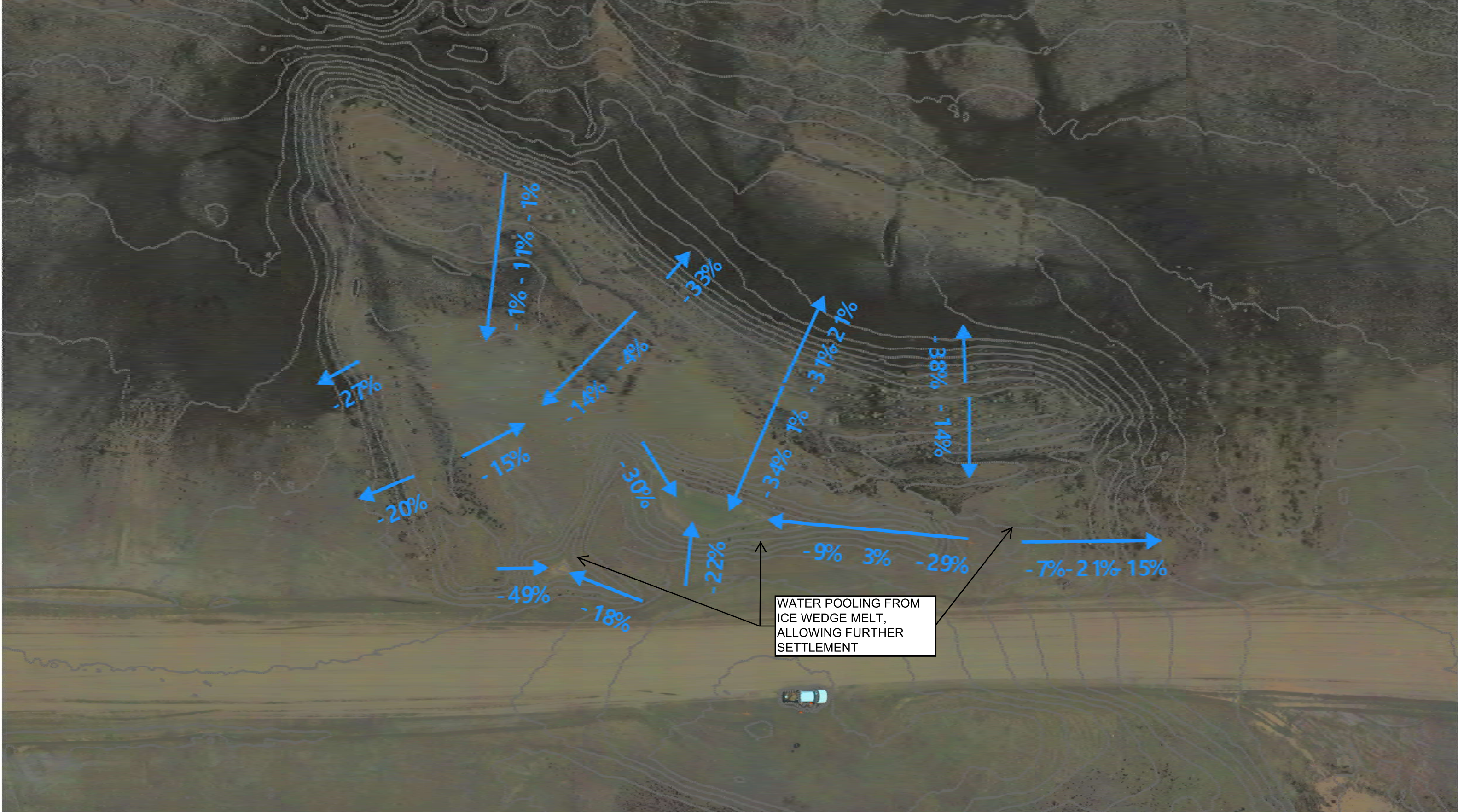


Figure D3. Post-reclamation site, surface grading, August, 2025



Figure D4. Post-reclamation site, side slope, August, 2025

Appendix D2: Drone Imagery Pre and Post Reclamation Conditions of Borrow Pit 71



WATER POOLING FROM
ICE WEDGE MELT,
ALLOWING FURTHER
SETTLEMENT



Notes: SEPTEMBER 2024 PRIOR TO REMEDIATION

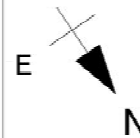
PROJECT:

PIT 71 REMEDIATION KM21

LEGEND

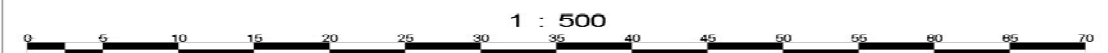
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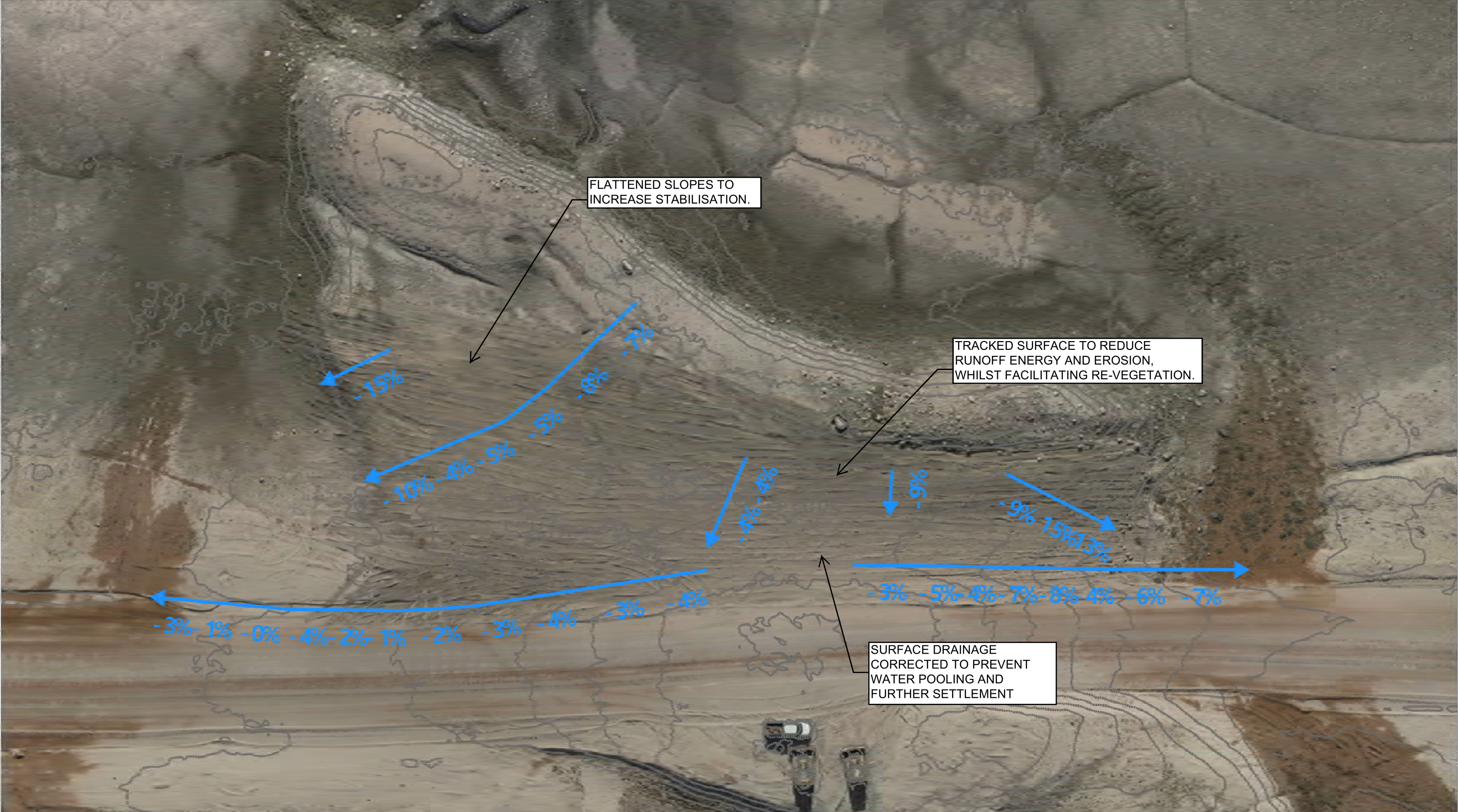
— FLOW PATH



DATE:

2025-08-02





PROJECT:	PIT 71 REMEDIATION KM21
DATE:	2025-08-02

LEGEND

0.5m CONTOUR

— FLOW PATH

Notes: JULY 2025 REMEDIATION

1 : 500