2025 WORK PLAN

JANUARY 15, 2025

REV 0



Jan. 15,	0	Issued for	Sustainable Development	Megan Lord-Hoyle	Floren	<u> </u>
2025		Use		M. Lord-Hoyle	T. Eldem	M. O'Brien
Date	Rev.	Status	Prepared By	Approved By		





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APPENDIX D	SPILL CONTINGENCY PLAN (BIM-5200-PLA-0012)



1 EXECUTIVE SUMMARY

The following document presents the 2025 Work Plan for the Mary River Project as required under Section 6.1 of Commercial Lease No. Q13C301 (the Lease) agreed between Baffinland Iron Mines Corporation (Baffinland) and the Qikiqtani Inuit Association (QIA). Additionally, this document is a requirement under Amendment No. 1 of the Type 'A' Water Licence 2AM-MRY1325 for the purposes of an Annual Security Review (ASR). The 2025 Work Plan was submitted to the NWB and QIA on January 15, 2025.

In the event the Project does not advance, the work items as described and constructed for the Mary River Project will be subject to reclamation, as per the Mary River Project Interim Closure and Reclamation Plan (BIM-5200-PLA-0026/BAF-PH1-830-P16-0012), refer to Appendix D and relevant regulatory and permit obligations.

The 2025 Work Plan has been prepared in accordance with the Lease Operations Guide for the "Annual Work Plan Submission" finalized in 2018. The Operations Guide is a set of procedures developed jointly by QIA and Baffinland to guide the on-going administration of the Lease.

Baffinland's Annual Work Plans represent planned works, improvements, infrastructure and equipment required to execute the currently approved phase of the project. For the 2025 Work Plan, there are no new activities proposed. For this reason, the currently held reclamation security is sufficient for the 2025 calendar year, and it is Baffinland's view that the Annual Security Review process is not required for 2025.

An overview of the on-going mining operations and works planned for 2025 is provided below, with further details presented in subsequent sections of the document.

- 1. Operation of the mine, ore crushing and land transportation, stockpiling and marine shipment of ore.
- 2. Continued development and construction of infrastructure required at Milne Port and the Mary River Mine Site (Mine Site) and along the Tote Road for the Mary River Project.
- 3. Continued operation of Mine Site and Milne Port Camps to support ongoing operations and construction activities which will include the use of water and deposition of waste as authorized under existing permits.
- 4. Ongoing operation of permitted quarry and borrow sources.
- 5. At Milne Port, vessels carrying fuel, equipment and supplies for use at the Mine Site and Milne Port will arrive during the summer. Material, fuel and supplies required for operational and construction activities will be transported to the Mine Site year round via the Tote Road.
- 6. Ongoing environmental effects studies and baseline data collection will continue to support Project activities as well as for future engineering requirements.
- 7. Continued environmental monitoring in accordance with the approved Project Certificate, licenses, authorizations, management plans and environmental effects monitoring plans.





- 8. Ongoing exploration activities including drilling, mapping, prospecting, sampling, and geophysics. Planning of the details of the summer drilling and/or trenching program are not yet finalized.
- 9. Tote Road improvements to address safety concerns, freshet runoff issues, fish passage issues and poor road conditions during the spring and summer periods.
- 10. Erection of additional maintenance facilities to safely service equipment.



2 LIST OF CURRENT PERMITS

The Work Plan is presented within the context of the applicable regulatory authorizations. The main regulatory instruments that allow for the 2025 Work Plan activities are presented in Table 2.1 below.

Table 2-1: Existing Environmental Permits

Approval or Inuit Agreement	Project Activity and Update	Expiry
Nunavut Impact Review Nunavut Agreement	w Board (NIRB)	
Project Certificate No. 005	 Initial submission for Mary River Project which included: Development of Deposit 1 and related mine site infrastructure, including camp, water and waste management facilities Use of Northern Tote Road and Milne Port to transport supplies and equipment required for construction. Transportation of iron ore by Railway south to Steensby Port once railway is constructed. Shipping of iron ore via Southern shipping route Additional fuel and expanded accommodation complex at Milne Port were also approved 	N/A
ERP (Amendment 1)	Submission for additional iron ore extraction and transportation through the Northern Transportation Corridor: • Additional mining of Deposit 1 • Transportation of up to 4.2 Mtpa of ore north by trucking on the Tote Road to Milne Port • Shipping of up to 4.2 Mtpa of ore from Milne Port through the Northern Shipping Route	N/A
PIP (Amendment 2)	 Submission for additional iron ore extraction and transportation through the Northern Transportation Corridor which included: Transportation of an additional 1.8 Mtpa of iron ore for a total of up to 6 Mtpa of ore north by trucking on the Northern Tote Road to Milne Port until the end of 2019 Shipping of an additional 1.8 Mtpa of iron ore for a total for a total of up to 6 Mtpa of ore from Milne Port through the Northern Shipping Route until the end of 2019 	December 31, 2019
PIPE (Amendment 3)	Submission to maintain existing Northern Transportation Corridor limits as described in the PIP.	December 31, 2021
PIP Renewal (Amendment 4)	Submission to maintain existing Northern Transportation Corridor limits as described in the PIP.	December 31, 2022
SOP	Submission to maintain existing Northern Transportation Corridor limits as described in the PIP, with additional allowance of shipping up to 0.9 Mtpa to account for stranded ore until the end of 2024	December 31, 2024
Nunavut Planning Com		
Amendment No. 1 to NBRLUP	Required to establish a railway transportation corridor within the NBRLUP for the portion of the Steensby Railway located in its boundary (Attachment 1.7)	No Expiry



Approval or Inuit Agreement	Project Activity and Update	Expiry
Amendment No. 2 to NBRLUP	Required to intensify use of Tote Road for Early Revenue Phase	No Expiry
Amendment No. 3 to NBRLUP	Required to establish a railway transportation corridor within the NBRLUP for the proposed North Railway (included in Phase 2 Proposal, which was ultimately rejected by Minister in 2022)	No Expiry
Qikiqtani Inuit Associa	tion (QIA)	
Agreements issued und	der Articles 6, 20 and 26 of the <i>Nunavut Agreement</i>	
Inuit Owned Land (IOL) Commercial Lease Q13C301	Mine development activities on IOL; Compliance with the lease is outlined in the 2021 QIA and Nunavut Water Board (NWB) Annual Report for Operations and the 2021 QIA and NWB Annual Report for Exploration and Geotechnical Drilling, submitted March 31, 2022.	December 31, 2043
Mary River Inuit Impact and Benefit Agreement (IIBA)	Required under Article 26 of the <i>Nunavut Agreement</i> to proceed with the Project - concluded first in September, 2013, subsequently amended in October, 2018 to account for the temporary 6 Mtpa production increase proposal; Compliance with the agreement is outlined in the Annual Inuit Impact and Benefit Agreement Implementation Report submitted by March 31 st of each year.	Life of Project
Wildlife Compensation Agreement	Wildlife Compensation required under Article 6 of the <i>Nunavut Agreement,</i> with the regime set out in the IIBA.	No Expiry
Quarry Concession Agreement		
Water Compensation Agreement	Required under Article 20 of the <i>Nunavut Agreement</i> to provide compensation to Inuit for water use by the project or impact to water use.	Ultimate expiry of Type A Water License (after renewals and amendments)
Nunavut Water Board		
	under the Nunavut Agreement (Article 13), the <i>Nunavut Waters and Nunavut Surface</i> : Territories Water Regulations	Rights Tribunal
Type 'A' Water	Water use and waste disposal associated with the mine	June 10, 2025
Licence 2AM- MRY1325 Amendment No. 1	In good standing; no amendments were issued by the NWB in 2023. Compliance with the Licence is outlined in the 2023 QIA and NWB Annual Report for Operations, submitted March 31, 2023	
	Note – Baffinland is currenly pursuing a renewal of the Type A Water License following the NWB renewal process, but is not proposing any modifications or amendments to its terms. In particular, no amendments to the Type A Water Licence are required to proceed with SOP2.	
Type 'B' Water Licence 2BE- MRY2131	Regional exploration activities, including exploration drilling; In good standing. Compliance with the Licence is outlined in the 2021 QIA and NWB Annual Report for Exploration and Geotechnical Drilling, submitted March 31, 2022.	April 16, 2031



Approval or Inuit Agreement	Project Activity and Update	Expiry
Mineral Leases and Lan	ations and Northern Affairs Canada (CIRNAC) Id Leases, Land Use Permits, and Quarry Permits on Crown Land, issued under the <i>Terr</i> Id adian Mining Regulations and Territorial Land Use Regulations	itorial Lands
Foreshore Lease 47H/16-1-2 Lease Amendment 47H/16-1-5	Supersedes historical Class A Land Use Permit N2014X0012; Use of foreshore area for current Milne Port Ore Dock; In good standing.	June 30, 2035
Tote Road and Borrow Area Land Use Permit N2019Q0011	Land use permit for the section of Milne Inlet Tote Road on Crown Land, associated quarries and infrastructure. Note – Baffinland is pursing automatic two year extension on all current land use permits to June 29, 2026	June 29, 2024
Land Use Permit Bruce Head: N2019J0010	Land use permit for the summer marine monitoring camp at Bruce Head, in Milne Inlet Note – Baffinland is pursing automatic two year extension on all current land use permits to June 29, 2026	June 29, 2024
Land Use Permit Steensby: N2019C0009	Land use permit for the infrastructure and activities on Crown Land at Steensby Port. Note – Baffinland is pursing automatic two year extension on all current land use permits to June 29, 2026.	June 29, 2024
Mineral Leases #2483, #2484 and #2485	Rights to extract minerals; Lease #2484 covers Deposit No.1.	August 27, 2034
DFO Authorizations an	d Letters of Advice (LOA) issued under the <i>Fisheries Act</i>	l
Letters of Advice (various)	Prior to 2021, DFO issued Baffinland various letters of advice regarding Project crossings along the Tote Road, at quarries, culvert extensions and replacements, and for stockpile expansion work at Milne Port. In January 2024 DFO issued an addition letter of advice related to the replacement of 10 culverts along the Tote Road.	No Expiry
Fisheries Authorization 06- HCAA-CA7-0084	Authorization to construct water crossings in fish habitat along the Tote Road; The authorization remains valid and has been amended over the years. A monitoring report for the water crossings was submitted to DFO on December 31, 2021.	Not applicable; monitoring ongoing
Fisheries Authorization 14- HCAA-00525	Authorization to construct the Milne Port Ore Dock in fish habitat; DFO reviewed final monitoring report and closed file on May 31, 2021	Closed
Fisheries Authorization 18- HCAA-00160	Authorization to construct the Freight Dock in fish habitat; The Year 2 monitoring report for the Milne Port Freight Dock was submitted to DFO on March 18, 2022, in accordance with regulated timelines. A revised amendment application for the Freight Dock was also submitted by Baffinland on December 20, 2021. DFO Approval is expected in June 2024.	Not applicable; Request for extension TBD



Approval or Inuit Agreement	Project Activity and Update	Expiry					
Transport Canada (TC)							
• •	works under the <i>Navigable Waters Protection Act</i> (NWPA; now the <i>Canadian Navigable</i> proval under the <i>Marine Transportation Security Act</i> and Regulations	e Waters Act);					
Approvals: 8200-07- 10273, 8200-07-10267, 8200-07-10269, 8200-07-10274, 8200-07-10272, 8200-07-10266, 8200-07-10271	10273, Road at crossings: CV-040, BG-50, CV-128, CV-223, CV-072, BG-17, CV-217, and CV-099. In good standing, no changes from previous year. 8200-07-10268, 8200-07-10274, 8200-07-10272, 8200-07-10266,						
Statement of Compliance of a Marine Facility # 1000000660	Approval for the Milne Inlet Marine Facility to conduct iron ore operations	May 27, 2025					
National Resources of	Canada						
Licensing of Explosives	Manufacture and Storage Facilities under the Explosives Act						
Division 1 Factory Licence #F76068/E	Issued to Baffinland's explosives contractor to manufacture explosives for the mine	No Expiry					
Governor in Council	Governor in Council						
Territorial Lands Act							
Order-in-Council 2013-0953	Required for authority for Crown Indigenous Relations and Northern Affairs Canada to issue lease for Steensby Railway lands located on federal lands, per Territorial Lands Act	No Expiry					



3 ANNUAL SCOPE OF OPERATIONS AND WORK

3.1 2025 ACTIVITIES

No new activities are proposed for 2025 as part of the 2025 Work Plan.

For consistency with previous Annual Work Plan documents, Table 3.1 – Scope of Work for 2025 has been retained in this document, and notes that no new activities have been proposed.

Table 3-2 provides information on scope of work items carried over from previous years. For these items, reclamation security is in place, however the work has not been completed.

Table 3-3 describes progressive reclamation activities that will occur in 2025.

While the activities outlined in this 2025 Work Plan represent planned works, improvements, infrastructure, and equipment required to execute the currently approved phase of the project, it is anticipated that additional approvals from the NWB, QIA, and DFO will be required for select activities, and may include;

- Submission of issued-for-construction (IFC) drawings under the existing Type 'A' Water Licence 2AM-MRY1325;
- An Option Exercise Notice (OEN) to modify the boundaries of the Commercial Lease, or to reclassify lands in accordance the terms and conditions of the Commercial Lease;
- A Tote Road Adjustment Notice (TRAN) for changes to the alignment, grade or design of the Tote Road as described in the Lease Operations Guide for the Tote Road Adjustment Notice and in accordance with the terms and conditions of the Commercial Lease; and
- Authorization or Letter of Advice from DFO for impacts to fish or fish habitat.



Table 3-1: Scope of Work for 2025

Item No.	Property Section	Land Use Area	Approximate Location	Description	Description of Effect on Feature(s)	Anticipated Completion Year	Required Permit Applications	Other Information	
Scope o	Scope of Work for 2025								
				No new scope of work items proposed for 2025					

Table 3-2: Work Carried over from Prior Years

Item No.	Property Section	Land Use Area	Approximate Location	Description	Description of Effect on Feature(s)	Anticipated Completion Year	Required Permit Applications	Other Information
Work Ca	arried ove	r from Pric	or Years					
2024-1	Mine Site	Impact Area	N7914067 E559301	Fencing at Mary River Aerodrome (788m length)	No effect, will occur on developed laydown within PDA	2025	Security	Layout drawings
2024-2	Mine Site	Impact Area	N7914196 E560092	QMR2 Quarry Sedimentation Pond (5,300 m2)	Lined area on developed laydown within the PDA	2025	Security IFC Submittal	IFCs
2024-3	Mine Site	Impact Area	WRF - N7916397 E563475	Leveling and grading within footprint of future Waste Rock Facility expansion to support geotechnical investigation work	Leveling and grading within the PDA	2025	Security IFC Submittal	IFCs
2024-4	Mine Site	Impact Area	N7912927 E561097	Additional snow stockpiling area (25,000 m2)	Leveling and grading within the PDA	2025	Security	Layout drawings
2024-5	Mine Site	Impact Area	N7912823 E562064	Development of a laydown area at the Mine Site for temporary storage of equipment and materials (13,552 m2)	Leveling and grading within the PDA	2025	Security	Layout drawings
2023-1	Mine Site	Impact Area	(A) N7912740 E562483 (B) N7912825 E562090	Water treatment plant for km 105 sedimentation pond	No effect, will occur on developed laydown within PDA	2025	Security	IFCs
2023-2	Mine Site	Impact Area	N7913149 E563603	Expansion of KM 106 stockpile pad to increase road width to accommodate water truck loading area (2,000 m²)	Leveling and grading within PDA	2025	Security	Layout drawings
2023-3	Mine Site	Impact Area	N7914362 E558333	Lined containment berm and 15,000 L Jet A Tank at the weatherhaven.	No effect, will occur on developed laydownwithin PDA	2025	Security	IFCs
2023-4	Tote Road	Impact Area	Various	Replacement of culverts at fish-bearing streams along the Milne Inlet Tote Road to designs exceeding those in the 2013 ERP design.	Leveling and grading within PDA	2025	Security Fisheries Act Order, IFC submittal	IFCs
2022-1	Mine Site	Impact Area	(A) N7912718 E560727 (B) N7912733 E560724	Construction of Landfarm Cell 4 (4,611 m ²) and expansion of Cell 3 (1,288 m ²). 2024 WORK PLAN UPDATE: Landfarm Cell 4 will be removed from the planned scope of work.	Leveling and grading within PDA	2025	Security	None
2022-2	Mine Site	Impact Area	N7912959 E5630983	Ore Stockpiling area at KM 105.5 (114,847 m2)	Leveling and grading within PDA	2025	Security IFC Submittal	None
2022-4	Mine Site	Impact Area	N7913097 E561423	Mobile equipment laydown and tire facility (14,108 m²).	Leveling and grading within PDA	2025	Security	Layout drawings
2022-10	Mine Site	Impact Area	N7914460 E558050	15,000 L Bulk diesel storage at Weatherhaven to support drilling operations	No effect, will be placed on developed lined containment facility within PDA	2025	N/A	N/A
2022-11	Mine Site	Impact Area	N7915411 E563242	Installation of Power Distribution cabling from the new KM110 building to the Mine water treatment facility (500m)	No effect, will be placed on developed laydown within PDA	2025	Security	None



Item No.	Property Land Use Section Area Approximate Location		Approximate Location	Description	Description of Effect on Feature(s)	Anticipated Completion Year	Required Permit Applications	Other Information
2022-12	Mine Site	lmpact Area	N7913182 E561074	Construction of new Sedimentation Pond SDLT-1 - 20,678 m² (lined), 58,324 m² (unlined)	Leveling and grading within PDA	2025	Security, IFC submittal	IFCs
2022-13	Mine Site	Impact Area	N7914459 E563934	Communication tower KM 108	No effect, will occur on developed laydown within PDA	2025	Security	Layout drawings
2022-15	Mine Site	Impact Area	N7913226 E561516	New building and expansion of Mary River HD Maintenance Shop (878 m²)	Leveling and grading within PDA	2025	Security	None
2022-19	Milne Port	Impact Area	N7976055 E503688			2025	Security	None
2021-1	Mine Site	Impact Area	(A) N7913243 E561233 (B) N7913358 E561547	Installation of power distribution cabling at the Mine Site facilities, including; a) Mary River Powerhouse to Dyno Nobel explosives facility (500 m) b) Mary River E-House 3 to KM 104 laydown (300 m)	No effect, will be placed on developed laydown within PDA	2025	Security	None
2021-8	Milne Port	Impact Area	N7975343 E503420	New thaw and wash bay facility for mobile vehicle maintenance. Footprint of 1,250 m ² .	No effect, will be placed on developed laydown within PDA	2025	Security	Layout Drawings
2021-10	Mine Site	Impact Area	N7912392 E560965	Development of Landfill Cell #4 Fill placed on undisturbed tundra, erection of perimeter fencing.		2025	None	IFCs
2021-14	Mine Site	Impact Area	N7914430 E562938	Modification to roadways within the ultimate pit limit of Deposit 1, including pit perimeter road and expansion of the cross cut road. All ground disturbance and road construction within the ultimate Deposit 1 pit limits. Leveling and grading within PDA and the ultimate pit limit construction within the ultimate Deposit 1 pit limits.		2025	None	Layout Drawings
2021-15	Mine Site	Impact Area	(A) N7913312 E561706 (B) N7912785 E562266	Expansion of the area east of the Mine Site workshops and crushing area for improved traffic management - KM 104 to MSC (19,424 m²), KM 104.5 to Crusher (18,308 m²).	Leveling and grading within PDA	2025	Security Water Licence Modification	IFCs
2021-17	Mine Site	Impact Area	(A) N7913688 E563838 (B) N7914037 E564237	Construction of two (2) laydown areas for road aggregate storage on the mine haul road 106 Km (4,843 m2), 107 Km (2,159 m2)	Leveling and grading within PDA	2025	Security	Layout Drawings
2021-19	Mine Site	Impact Area	N7915574 E564180	Explosives plant secondary storage location TBD (20,000 m ² - laydown grade and recontour)	Leveling and grading within PDA	2025	Security NRCan Approval	Layout Drawings
2020-3	Mine Site	Impact Area	A) Mine Site - N7914780 E558420 (B) Milne Port - N7975973 E503774	Installation of two (2) new waste incineration units; one (1) at the Mine Site, one (1) at Milne Port	No effect, will be placed on developed laydown within PDA	2025	Security	IFCs
2020-4	Mine Site	Impact Area	N7916744 E563228	Expansion of the Waste Rock Facility Water Treatment Plant to include an additional geotube settling containment area. Total footprint of new lined area is 3,000 m ³ .	Leveling and grading within PDA	2025	Security Water Licence Modification	IFCs
2020-7	Mine Site	Impact Area	N7914428 E563192	Implementation of a water management plan for Deposit 1, including berms and ditching to manage surface water.	Leveling and grading within the ultimate limit of Deposit 1	2025	None	IFCs
2020-8	Mine Site	Impact Area	(A) HD Shop - N7913209 E561467 (B) MR Shop - N7913295 E5612525 (C) Wash Bay - N7913213 E561645 (D) 110 Laydown - N7915177 E563454	Construction of waste containment cells exterior to workshop facilities, for temporary storage of materials prior to longer term storage in the Hazardous Waste Berms and eventual backhaul. HD Shop - 72 m² MR Shop - 120 m² Wash Bay - 120 m² 110 Laydown - 144 m²	Lined area on developed laydown within the PDA	2025 Modification		IFCs

MARY RIVER PROJECT

2025 Work Plan, Rev. 0

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Item No.	Property Section	Land Use Area	Approximate Location	Description Description of Effect on Feature(s		Anticipated Completion Year	Required Permit Applications	Other Information
2020-13	Tote Road	Impact area	Various	Continued work to repair and replace culverts along the Tote Road, including those with identified fish passage issues. All culverts will be repaired or replaced to the 2013 Early Revenue Phase design.	Positive environmental effect, focus on improving water management and fish passage	2025	None - Security in Place	N/A
2019-9	Milne Port	Impact Area	N7975481 E503779 (2,700 m2)	New contaminated water/snow containment pond adjacent to existing pond at Milne Port			OEN Water Licence Modification	IFCs
2019-11	Mine Site / Milne Port	Impact Area	(A) Mine Site - N7914539 E558228 (360 m2) (B) Milne Port - N7976251 E503915 (360 m2)	Construction of new hazardous waste berm at the Mine site and at Milne Port. Decommissioning of select existing berms to consolidate waste management.	L Environmental ontimization. Leveling and grading within PDΔ - L		OEN Water Licence Modification	IFCs
2020-14	Tote Road	Impact Area	A) KM 26 - N7959689 E518576 (B) KM 80 - N7922308 E542130	Addition of washroom facilities/refuge stations at KM26 and KM80 IT Towers.	Minor leveling and grading within PDA.	2025	Security	Layout Drawings
2019-15	Mine Site	Impact Area	N7914500 E558150 (13,800 m2)	Decommissioning and repurposing of Weatherhaven structures for storage and workspace.	No effect, will occur on developed laydown within PDA	2025	None	Layout drawing(s)
2019-16	Mine Site	Impact Area	N7913450 E560450	Expansion of the 800 person camp pad to the north by approximately 12,000 m ² to accommodate additional support offices and buildings.	o Leveling and grading within PDA		Security	Layout Drawings
2019-17	Mine Site	Impact Area	N7913450 E560450	Addition of offices/trailers/buildings at the 800p Camp. Total footprint is 925 m ² , including approximately 500 m ² for a new fire hall and emergency response building.			Security	Layout Drawings
2019-18	Mine Site	Impact Area	N7912328 E561111 (9,000 m2)	Construction of a landfarm at the Mine Site landfill facility, with an estimated footprint of 9,000 m ² . Disturbed area included in 2018 Addendum, new lined area requires security allocation.	Leveling and grading within PDA. Area already allocated as disturbed.	2025	Water Licence Modification No. 10 (Approved) Security in place Notification to NWB	IFCs
2018-27	Milne Port	Impact Area	N7976483 E504119	Relocation of effluent discharge point to barge offload area	Positive effect. Reduced environmental spill risk.		Water Licence Modification No. 7 (Approved)	IFCs



Table 3-3: Progressive Reclamation

Item No.	Property Section	Land Use Area	Approximate Location	Description	Description of Effect on Feature(s)	Anticipated Completion Year	Required Permit Applications	Other Information			
Progres	Progressive Reclamation										
	Milne Port	Milne - N7975568 F503745 Management of hydrocarbon impacted soils within the existing landfarm facilities		N/A	Ongoing	N/A	N/A				
	Milne Port	-	N/A	Demobilization of equipment and supplies not required for near term activities as well as current inventory of hazardous waste and other materials by means of sealift from Milne Port.	N/A	Ongoing	N/A	N/A			
	Milne Port and Mine Site	Discharge and treatment of residual treated sewage effluent stored in PWSP at Mary N/A River Exploration Camp and Milne Port Site.		N/A	Ongoing	N/A	N/A				
	Road - N/A addre		N/A	Continue the development and implementation of a long term multi-year plan to address localized areas of permafrost degradation associated with the current borrow areas including KM 97	N/A	Ongoing	N/A	N/A			
	Tote Road	-	N/A	Reclamation of sections of the exploration phase Tote Road no longer in use by means of scarifying and culvert removals.	N/A	Ongoing	N/A	N/A			
	Mine Site	-	N7912845 E560922	Continued development of the Mine Site landfill and deposition of non-hazardous waste in accordance with the Landfill Maintenance and Operations Manual	N/A	Ongoing	N/A	N/A			
	Site Wide	-	N/A	Ongoing removal from site, or safe disposal on-site of infrastructure, equipment and supplies no longer required for ongoing construction and operations.	N/A	Ongoing	N/A	N/A			
	Site Wide	-	N/A	Unless otherwise identified within the approved interim Closure and Reclamation Plan, where roads are no longer in use - removal of culvert and open/restore the natural drainage channel. Measures will be taken to minimize erosion and sedimentation	N/A	Ongoing	N/A	N/A			
	Site Wide	-	N/A	Areas that have been contaminated by hydrocarbons from normal fuel transfer, handling and storage activities will be reclaimed to meet objectives as outlined in the Government of Nunavut's Environmental Guideline for Site Remediation 2010. Use of reclamation soils for purpose of back fill or general site grading may be carried out with approval of applicable inspectors and agencies.	N/A	Ongoing	N/A	N/A			



3.2 INFRASTRUCTURE LAYOUT AT END OF 2025

Site layouts for Milne Port, the Milne Inlet Tote Road, and the Mary River Mine Site, can be found in Appendix A of this document. The figures show disturbed areas in addition to undisturbed areas for which security has been posted.



4 MINING AND EXPLORATION ACTIVITIES

4.1 EXPLORATION ACTIVITIES AND DRILLING PLANS

The scope of Baffinland's Type 'B' Licence (2BE-MRY2131) and Commercial Lease with QIA allows for Baffinland to continue/undertake the exploration activities and drilling programs on its mineral leases in the Qikiqtani Region of Nunavut. This includes the exploration land use areas as defined in Section 2.2 of Commercial Lease. The types of exploration activities planned for 2025 are included within the scope of the Type 'B' Water Licence.

At this time when the Work Plan is required to be submitted, the exploration and drilling programs for 2025 have not yet been finalized. However, as a minimum, activities will include:

- Drilling
- Mapping
- Sampling
- Geophysical and geochemical surveys.

It is anticipated that exploration activities will continue in 2025 with a drilling program on Deposits 1, 2, and 3. Once proposed drilling locations are finalized, this information will be provided to QIA, NWB, CIRNAC, and others.

4.2 AMOUNT AND TYPE OF ORE AND WASTE TO BE MINED

An estimate of the breakdown of ore vs. waste to be mined from Deposit No. 1 by month during 2025 is provided in Table 4.1 below.

Month	Ore Mined (t)	Waste Mined (t)	Total Mined (t)
January	333,552	176,169	509,721
February	362,069	120,690	482,759
March	365,590	143,862	509,452
April	343,309	182,898	526,207
May	313,793	212,414	526,207
June	402,820	88,697	491,517
July	434,483	96,552	531,034
August	387,429	119,467	506,897
September	316,690	93,655	410,345
October	316,690	117,793	434,483
November	316,690	93,655	410,345
December	301,750	108,595	410,345
Total	4,194,864	1,554,447	5,749,311

Table 4-1: Mine Forecast 2025

4.3 AMOUNT AND TYPE OF ORE TO BE SHIPPED EACH MONTH

Ore shipping during 2025 will occur between August and September. The expected total shipping quantities for 2025 are shown in Table 4.2 below.

4,200,000



Total

	Lump Ore	Shipped (t)	Fines Sh	ipped (t)	Total Sh	ipped (t)		
Month	Milne Inlet	Steensby Inlet	Milne Inlet	Steensby Inlet	Milne Inlet	Steensby Inlet		
January	-	-	-	ı	-	-		
February	-	-	-	ı	-	-		
March	-	-	-	-	-	-		
April	-	-	-	-	-	-		
May	-	-	-	-	-	-		
June	-	-	-	-	-	-		
July	-	-	-	-	-	-		
August	454,759	-	1,299,586	-	1,754,345	-		
September	791,724	-	1,653,931	-	2,445,655	-		
October	-	-	-	-	-	-		
November	-	-	-	-	-	-		
December	-	-	-	-	-	-		

Table 4-2: Ore Shipping Forecast 2025

4.4 SPECIFIED SUBSTANCES TO BE QUARRIED AND EXPECTED USES

A summary of the expected quantities of quarried and borrow materials to be extracted during 2025 are provided in Table 4.3, below. The expected quarterly quantities of each specified substance per quarry site and borrow location is also provided in Table 4.3, below.

2,953,517

Table 4-3: 2025 Quarry and Borrow Pit Quantities¹

1,246,483

Quarry Summary	Km Location	Permitted	10	0 2	£D	Q4	Total	Estimated Breakdown Of Specified Substances
	UNITS		m³	m³	m³	m³	m³	
Q1	1	Permitted	-	20,000	40,000	20,000	80,000	Rock
Q7	7	Permitted	-	-	-	-	-	Rock
Q11	21	Permitted	-	-	-	-	-	Rock
Q19	93.5	Permitted	-	-	-	-	-	Rock
QMR2	102	Permitted	-	-	-	-	-	Rock
Km 2	2	Permitted	-	-	-	-	-	Granular
Km 97	97	Permitted	15,000	15,000	-	-	30,000	Granular
Total	-	-	15,000	35,000	40,000	20,000	110,000	-

¹ The quantities from each source are approximate values and may vary based on minor changes to the schedule and scope, however, the aggregate volume to be extracted is expected to remain constant.



5 ANNUAL QUANTITIES OF SOLID WASTE

5.1 SOLID WASTE DISPOSAL

The expected annual quantity of solid wastes to be deposited during 2025 is established from survey volumes measured in 2015 through 2024, as well as an analysis of proposed activities. Estimated quantities of solid waste to be deposited in approved waste storage areas are shown in Table 5.1 below.

Table 5-1: Annual Volume of Solid Waste to be Deposited in Waste Storage Areas in 2025

Property Section	Waste Storage Area	Volume of Solid Waste to be disposed of (m³)
e.g. Milne Port/Tote Road/Mine Site	-	-
Mine Site	Landfill	4,500
	Total	4,500



6 EXPECTED USES OF WATER

6.1 WATER USE

The Type 'A' Water Licence 2AM-MRY1325, Amendment No. 1 permits the following maximum water use for domestic and industrial purposes during construction phase of the Project, as shown in Table 6.1 below. As per Clause 22 of the QIA-Baffinland Water Compensation Agreement, Baffinland will pay a Consumptive Payment for Water Use, in connection with the Project for the maximum water volume permitted to be used or withdrawn annually as defined in the water licences issued to Baffinland by NWB.

Table 6-1: Approved Water Use for Domestic and Industrial Purposes during Construction Phase

Property Section	Water Source Name	Water Source Location	Annual Volume to be used (m³)
Milne Port	Phillips Creek (Summer)	71° 52′ 53.3″ N 80° 56′ 04.0″ W	134,130 m³/year
(Milne Inlet)	Km 32 (Winter)	71° 30′ 39.5″ N80° 14′ 54.4″ W	134,130 III / year
Mine Site (Mary River)	Camp Lake	71° 19' 38.6" N 79° 22' 57" W	240,000 m³/year
Steensby Port	ST 347 km Lake	N/A	0 3/
(Steensby Inlet)	3 km Lake	N/A 0 m ³ /	
	371,130 m³/year		

Source: Amendment No.1 Type 'A' Water Licence (2AM-MRY1325)

The Type 'A' Water Licence 2AM-MRY1325, Amendment No. 1 authorizes Baffinland to withdraw up to 1,500 m³/day to a maximum of 547,500 m³ annually of water specifically for use in dust suppression or control along the Tote Road of the Project. Water for dust suppression or control shall be obtained from the sources in accordance with thresholds established and shown in Table 6-2 below.

Table 6-2: Water Use for Dust Suppression

	Water	Water Sou	rce Location	Daily Water Take	
Property Section	Source Name	Latitude	Longitude	Proposed for Dust Suppression(m³/day)	Restrictions
Milne Port	Phillips Creek	71° 52′ 53.3″ N	80° 56′ 04.0″ W	212	None
Milne Port	Km 32 Lake	71° 30′ 39.5″ N	80° 14′ 54.4″ W	364	None
Tote Road	CV128	71° 47′ 35.1″ N	80° 36′ 41.7″ W	580	None
Tote Road	CV099	71° 38′ 21.7″ N	80° 22′ 46.6″ W	110	June-July only during low flow (<mean flow)<br="">years</mean>
Tote Road	CV087	71° 34′ 10.0″ N	80° 19′ 41.6″ W	90	June-July only during low flow (<mean flow)<br="">years</mean>



	Water	Water Sou	rce Location	Daily Water Take	
Property Section	Source Name	Latitude	Longitude	Proposed for Dust Suppression(m³/day)	Restrictions
Tote Road	CV078	71° 31′ 51.9″ N	80° 16′ 07.8″ W	75	June-July only during low flow (<mean flow)<br="">years</mean>
Tote Road	Katiktok Lake	71° 23′ 45.7″ N	79° 48′ 22.0″ W	318	None
Tote Road	BG50	71° 26′ 29.6″ N	80° 10′ 27.1″ W	150	None
Tote Road	BG32	71° 23′ 35.1″ N	79° 51′ 24.9″ W	130	June-July only during low flow (<mean flow)<br="">years</mean>
Tote Road	CV217	71° 23′ 51.4″ N	79° 48′ 50.9″ W	130	None
Tote Road	Muriel Lake	71° 22′ 18.5″ N	79° 39′ 24.3″ W	212	None
Tote Road	David Lake	71° 19′ 38.6″ N	79° 22′ 57.0″ W	132	June-July only during low flow (<mean flow)<br="">years</mean>
Tote Road	BG17	71° 21′ 19.8″ N	79° 34′ 44.0″ W	75	June-July only during low flow (<mean flow)<br="">years</mean>
Tote Road	CV223 (Tom River)	71° 19′ 40.5″ N	79° 26′ 15.8″ W	135	None
Mine Site	Camp Lake	71° 19′ 38.6″ N	79° 22′ 57″ W	86	None

Source: Amendment No.1 Type 'A' Water Licence (2AM-MRY1325).



7 MATERIALS TO BE SHIPPED OFF THE PROPERTY

7.1 MATERIALS SHIPPED OUT

As required by the Lease, the expected quantities of materials planned to be shipped off site in 2025 are detailed in Table 7.1 below.

Table 7-1: Materials to be Shipped Out in 2025²

Property Section	Equipment/ Material Item	Owner	Estimated Annual Amount of Equipment and Material (tonne)	Estimated Annual Revenue Tonnes
e.g. Milne Port/Mine Site	Description of the equipment or the material*	e.g. BIM/Third Party	Estimated total annual amount of equipment and material (tonne)	Estimated amount of revenue tonnes assigned to the shipping of equipment or material
Milne Port	Batteries	BIMC	83	83
Milne Port	Hydrocarbon Contaminated Material	BIMC	191	191
Milne Port	Waste Oil	BIMC	1150	1150
Milne Port	Waste Fuels	BIMC	85	85
Milne Port	Waste Grease	BIMC	30	30
Milne Port	Waste Hazardous Liquids	BIMC	373	373
Milne Port	Waste Aerosol Canisters	BIMC	2.4	2.4
Milne Port	Contaminated Containers/Solids	BIMC	297	297
Milne Port	Misc Hazardous Materials	BIMC	233	233

² For hazardous waste assumptions used in the calculation of the quantity of generated hazardous waste for the Project, please refer to the Waste Management Plan (BIM-5200-PLA-0013).



8 MATERIALS TO BE SHIPPED TO THE PROPERTY

8.1 DELIVERY OF FUEL

At least two bulk fuel deliveries will occur during the 2025 sealift to support Baffinland's current operations. During the shipping season, arctic diesel and Jet A fuel will be delivered to fill the tanks at the Milne Port tank farm.

The anticipated fuel delivery provided in the below Table 8.1.

Table 8-1: Anticipated Fuel Delivery During 2025

	Diesel	Jet A
Total Bulk Fuel Delivery	63 ML	2.2 ML

8.2 MATERIALS SHIPPED TO THE PROPERTY (CURRENT OPERATION)

No specific mobile and mechanical equipment are anticipated to be received on the sealift in 2025.

Table 8-2: Mobile and Mechanical Equipment to be Received During 2025

Property Section	Material Item	Owner	Quantity	Revenue Tonne
e.g. Milne Port or Mine Site	Description of the material*		Quantity of the material to be shipped to and stored on the Property (including unit of measurement)	Estimated amount of revenue tonnes (mt) assigned to the shipping of material
	No mobile and mechanical equipment proposed to be received in 2025			

Additional supplies to support construction and operations through 2025 that will arrive on the 2025 sealift include:

- Delivery of ammonium nitrate (AN), up to 3,100,000 kg to be delivered to Milne Port and stored on-site in 2025;
- Delivery of maintenance parts; and
- Delivery of consumables (lubricants, grease, detergents, boosters, detonators, dry goods, food, household supplies, etc.).



9 UPDATES TO ITEMS CONTAINED IN THE SCHEDULES OF THE LEASE

9.1 UPDATES TO THE EMERGENCY RESPONSE PLAN

In accordance with Clause 5.1 item H of Commercial Lease Q13C031, the applicable Emergency Response Plan BIM-5000-PLA-0005 and Spill Contingency Plan BIM-5200-PLA-0012 have been provided in Appendices of this Work Plan. Please refer to Section 11 for location and details.

9.2 UPDATES TO ENVIRONMENTAL MANAGEMENT AND MONITORING PLANS

The current management and monitoring plans for the Mary River Project are presented in Table 9.1 below.

Table 9-1: Environmental Monitoring and Management Plans

Document Number	Plan Name	Revision Number	Current Revision Date
BIM-5000-PLA-0003	MDMER Emergency Response Plan	8	15-Apr-2024
BIM-5000-PLA-0004	Crisis Management Plan		22-Jan-2019
BIM-5000-PLA-0005	Emergency Response Plan	5	08-Dec-2020
BIM-5000-PLA-0006	Spill at Sea Response Plan (SSRP)	0	15-Aug-2015
BIM-5100-PLA-0004	Milne Inlet Marine Facility Security Plan	16	12-Sep-2023
BIM-5200-PLA-0002	Cultural Heritage Resource Protection Plan	3	07-Mar-2016
BIM-5200-PLA-0003	Environmental Protection Plan	2	30-Apr-2021
BIM-5200-PLA-0004	Sampling Program - QAQC Plan	7	31-Mar-2024
BIM-5200-PLA-0005	Air Quality and Noise Abatement Management Plan	8	30-Apr-2021
BIM-5200-PLA-0006	Snow Management Plan	7	31-Mar-2024
BIM-5200-PLA-0007	Hazardous Materials and Hazardous Waste Management Plan	7	30-Apr-2024
BIM-5200-PLA-0009	Surface Water and Aquatic Ecosystem Management Plan	7	31-Mar-2021
BIM-5200-PLA-0010	Terrestrial Environment Mitigation and Monitoring Plan	1	14-Mar-2016
BIM-5200-PLA-0011	Milne Inlet Tote Road Quarry Borrow Source Plan	0	07-Mar-2019
BIM-5200-PLA-0012	Spill Contingency Plan	6	31-Jan-2021
BIM-5200-PLA-0013	Waste Management Plan	10	30-Apr-2024
BIM-5200-PLA-0014	Ballast Water Management Plan	1	31-Mar-2019
BIM-5200-PLA-0015	Oil Pollution Prevention Plan	3	18-May-2023
BIM-5200-PLA-0016	Marine Environmental Effects Monitoring Plan	0	17-Mar-2016
BIM-5200-PLA-0017	Diesel E2 Plan - Milne Port	0	22-Feb-2020
BIM-5200-PLA-0018	Shipping and Marine Wildlife Management Plan	9	19-Jul-2022
BIM-5200-PLA-0017	Diesel E2 Plan - Mary River	0	22-Feb-2020
BIM-5200-PLA-0020	Exploration Closure and Reclamation Plan	2	25-Jan-2021
BIM-5200-PLA-0021	Exploration Spill Contingency Plan	1	25-Jan-2021
BIM-5200-PLA-0022	Fresh Water Supply, Sewage, and Wastewater Management Plan	11	31-Mar-2024





Document Number	Plan Name		Current Revision Date
BIM-5200-PLA-0023	Aquatic Effects Monitoring Plan	2	31-Mar-2024
BIM-5200-PLA-0025	Borrow Pit and Quarry Management Plan	0	20-Mar-2014
BIM-5200-PLA-0026	Interim Closure and Reclamation Plan	5	30-Oct-2018
BIM-5200-PLA-0027	Roads Management Plan	7	31-Mar-2019
BIM-5200-PLA-0028	Oil Pollution Emergency Plan - Milne Inlet (OPEP)	10	19-May-2023
BIM-5200-PLA-0029	Phase 1 Waste Rock Management Plan	4	31-Mar-2024
BIM-5200-PLA-0030	Life-of-Mine Waste Rock Management Plan	0	30-Apr-2014
BIM-5200-PLA-0024	Borrow Source Management Plan - KM 2	0	25-Oct-2014
BIM-5200-PLA-0031	Borrow Source Management Plan - KM 97	0	25-Oct-2014
BIM-5200-PLA-0032	Borrow Source Management Plan - KM 104	0	20-Mar-2014
BAF-PH1-830-P16-0017	Q1 Quarry Management Plan	3	25-Feb-2022
BAF-PH1-830-P16-0053	Q5 Quarry Management Plan	0	15-Dec-2020
BIM-5200-PLA-0033	QMR2 Quarry Management Plan	3	30-Jul-2021

A copy of Baffinland's Environmental Management Plans are available on the document web portal: https://www.baffinland.com/media-centre/document-portal/.

9.3 PROPOSED UPDATES TO THE INTERIM CLOSURE AND RECLAMATION PLAN

The Interim Closure and Reclamation Plan (ICRP) was previously updated in 2018 (Revision 5, 30 October 2018) and conditionally approved by QIA. In 2024, Baffinland completed an update of the ICRP to Revision 6 which is provided in Appendix D. The ICRP Rev. 6 was submitted to the NWB on November 1, 2024 and Baffinland will continue working with reviewers in 2025 to finalize it.

The ICRP is intended to be an iterative document that will evolve over the life of the Mary River Project. This update to the ICRP was undertaken to reflect changes to the Project since 2018, and plans for future work to support closure planning for the Project. It is recognized that QIA and CIRNAC, as the land owners, have been and will continue to provide valuable input and approval of the ICRP.

9.4 TOTAL CLOSURE AND RECLAMATION SECURITY SUMMARY – 2025 WORK PLAN

As no new activities are proposed for 2025, the reclamation security currently held by QIA and CIRNAC is sufficient to meet the requirements of the current Project, as detailed in Table 9-2.



Table 9-2: Mary River Project 'Global' Closure and Reclamation Security Summary – 2025 Work Plan

	Α	В		D	E	F	G
	Authorization	Liability	Total 'Global' Estimated Security for 2024	2025 Marginal Estimate	Total 'Global' Estimated Security for 2025	Total Posted as of August 2024	Marginal Adjustment to be Posted ⁵
				(\$)	(\$)	(\$)	(\$)
							E-F
1	Type A 2AM-	IOL ²	130,333,476	0	130,333,476	130,333,476	0
2	MRY1325	Crown	3,451,009	0	3,451,009	3,451,009	0
5	Subtotal Type A		133,784,485		133,784,485	133,784,485	0
6	Type B	IOL			165,000		165,000
7	Exploration	Crown			1,082,000	1,250,000	-168,000
8	2BE-MRY2131	Water			18,000		18,000
9	5	Land			1,229,000		1,229,000
10	Subtotal Type B	Exploration			1,247,000	1,250,000	-168,000
11	DFO Security	IOL ²					
12	Associated	Crown			1,200,000	1,200,000	
13	with Freight	Water			1,200,000	1,200,000	
14	Dock	Land					
15	Subtotal DFO				1,200,000	1,200,000	0
16		IOL ²					
17	AANDC Land Lease 47H/16- 1-2 ⁴	Crown			4,975,000	4,975,000	
18		Water					
19		Land			4,975,000	4,975,000	
20	Subtotal AANDO	Land Lease			4,975,000	4,975,000	0
21	GRAND TOTAL				141,206,485	141,209,485	-168,000

NOTES:







- 1) Totals in CAD
- 2) Security relating to IOL held by Qikiqtani Inuit Association (QIA) under Commercial Lease No. Q13C3O1
- 3) As per Mary River Exploration Project Closure and Reclamation Plan (BIM-5200-PLA-0020)
- 4) As per Closure and Reclamation Strategy and Financial Security Estimate for Nunavut Lease #47H/16-1-2 (H349001-2000-07-126-0001, Rev.0)
- 5) Marginal Adjustment to be posted due to 2025 Work Plan



10 REQUESTED AMENDMENTS TO THE PROVISIONS OF THE LEASE

There are no requested amendments to the provisions of the Commercial Lease at this time.

Additional Tote Road Adjustment Notices (TRANs) and Option Exercise Notices (OENs) may be submitted as per Table 3.1, throughout 2025. It is noted that per the Commercial Lease, review of OENs and TRANs outside of the Work Plan will require an associated fee for review.



11 ADDITIONAL REPORTS, INFORMATION OR DATA

Additional reports, information or data required to support the 2025 Work Plan are summarized in Table 11-1 below.

Table 11-1: Additional Reports, Information or Data

Title	Organization	Date	Annex
Identify the title of the additional report, information or data to be included with the Annual Work Plan.	Disclose the name of the organization that produced the addition report, information or data.	Include the publish date or reference year to the additional report, information or data.	Identify the Annex letter/number corresponding to the additional report, information or data.
2024 Disturbed Area Analysis	Stantec	January 2025	Appendix A
Interim Closure and Reclamation Plan BIM-5200-PLA-0026/BAF-PH1-830-P16-0012	Baffinland	30-Oct-2018	Appendix B
Emergency Response Plan BIM-5000-PLA-0005	Baffinland	08-Dec-2020	Appendix C
Spill Contingency Plan BIM-5200-PLA-0012	Baffinland	31-Jan-2021	Appendix D



2025 Work Plan, Rev. 0



APPENDIX A

2024 DISTURBED AREA ANALYSIS







Provided under separate cover.



APPENDIX B

INTERIM CLOSURE AND RECLAMATION PLAN (BIM-5200-PLA-0026/BAF-PH1-830-P16-0012)







Provided under separate cover.



APPENDIX C

EMERGENCY RESPONSE PLAN (BIM-5000-PLA-0005)







Provided under separate cover.



APPENDIX D

SPILL CONTINGENCY PLAN (BIM-5200-PLA-0012)







Provided under separate cover.