

Attachment 8 – Closure and Reclamation Plan



**CLOSURE AND RECLAMATION PLAN
EXPLORATION OPERATIONS
HIGH LAKE PROPERTY
NUNAVUT, CANADA**

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Revised: November 2022

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1.0 PREAMBLE

This Closure and Reclamation Plan (the Plan) is for the High Lake Project (the Project) operated by MMG Resources Inc. (MMG) in the Kitikmeot District of Nunavut (see location map). The Plan was in effect for seasonal exploration operations from 2010 to 2013. Land Use Permits were issued by the Kitikmeot Inuit Association (KIA) and Nunavut Impact Review Board (NIRB), and the camp was operated under Land Use Permit 2007C0009. The High Lake Camp was not opened in 2014. In 2015 there was a short period of limited occupancy to support reclamation of 10 wood frame tents and one plywood clad structure. In September 2017 a site visit was conducted to address observations related to closure of Land Use Permit N2011C0033. A planned site visit in 2018 was suspended due to early freezing conditions during the month of September across the Western Arctic. In August 2019 a site visit was conducted to address wildlife disturbance at the dock and camp structures. No site visit was conducted in 2020 due to the COVID-19 pandemic. In August 2021 a site visit was conducted to confirm that the camp was in a stable and secure state and to conduct necessary opportunistic maintenance. In August 2022 a site visit was completed to follow up on compliance items previously identified by Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC) during an inspection in 2017.

This Closure and Reclamation Plan includes applicable planning for three different scenarios:

Table 1: Closure and Reclamation Plan- Site Closure Scenarios

Long term care and maintenance	The facilities have been placed into long term care and maintenance with the removal of all fuel and lubricants and preparation of facilities without occupancy.
Seasonal closure	Annual closure activities in the event field activities resume.
Final closure	Applicable if facilities are abandoned and no further field work anticipated.

The High Like Camp is currently in long term care and maintenance without occupancy. This Closure and Reclamation Plan will be revised at the re-commencement of exploration activities and/or any time during operations. The revision date will be noted on the title page of the plan.

2.0 INTRODUCTION

The High Lake Camp has historically been used as a base of operations for mineral exploration programs within the High Lake Project area on a seasonal basis between March 1 and September 31. The camp is located approximately 550 km north-northeast of Yellowknife. Access is restricted to fixed wing aircraft of limited capacity on a year-round basis, with larger capacity aircraft seasonally operating from the frozen lake surface. The High Lake Camp has the capacity to accommodate up to 40 people. This Closure and Reclamation Plan has been prepared to address the three scenarios in Table 1.

3.0 SCHEDULE

The seasonal shutdown of the camp site is estimated to take 5 days to complete and will be carried out after all exploration activities have ceased. Seasonal shutdowns are proposed to be conducted no later than the end of September. The Plan will be applied by Project personnel under the supervision of the field supervisor and project manager.

4.0 SITE INFRASTRUCTURE

The High Lake Camp site has the following infrastructure in place:

- 1 Kitchen / Dry Facility that is wood framed and plywood clad
- 1 Accommodations / Recreation Facility that is wood framed and plywood clad
- 1 Shop and Storage Facility that is wood framed and plywood clad
- 1 Office Building that is wood framed and plywood clad
- 2 Storage Facilities that are wood framed and plywood clad
- 2 Accommodation Tents that are wood framed and plywood clad
- 1 Core Shack that is wood framed and plywood clad
- 1 Generator Shed that is wood framed and plywood clad
- 1 Bathroom Facility that is wood framed and plywood clad

5.0 LONG TERM CARE AND MAINTENANCE

The long term care and maintenance program (current site condition) is intended to be implemented for extended periods of time to make sure that the site remains safe, secure, and is not adversely impacting the environment. The site remains closed except for short periods of time during the summer to support site maintenance and annual site inspections. During long term care and maintenance, the conditions are maintained similar to the seasonal closure scenario (Table 1) of the Closure and Reclamation Plan, such that the site remains available to support potential future field activities.

6.0 SEASONAL CLOSURE AND RECLAMATION PLAN

6.1. BUILDINGS AND CONTENT

All equipment will be stored inside the wooden buildings to make sure they will withstand the winter season. Canvas tents will be secured and braced internally so that they will withstand snow and wind loads. Tarps over tents will be inspected and replaced on a seasonal basis.

6.2. WATER SYSTEM

Pump, tanks and hoses will be drained and dismantled. Rented equipment will be flown out and returned to the owner. Hoses will be rolled and stored in the tents over the winter.

6.3. ELECTRICAL SYSTEM

The Generator Shed will be inspected for remaining hazardous waste (e.g., oil, grease) and the generator will be drained of fuel. Remaining waste fuel and oil will be collected in the containers labeled for that usage. These containers will be sealed and removed from site for proper handling and disposal in Yellowknife (at KBL Environmental). The generator will be winterized and prepared for startup in spring. The soil surrounding the Generator Shed will be inspected for contamination. Any contaminated soil will be collected as outlined in the MMG Spill Contingency Plan Exploration Operations High Lake Property (MMG Resources Inc., 2021) (MMG Spill Contingency Plan) and removed from site for proper disposal. Electrical wires, plugs and sockets will be stored in the Kitchen/Dry Facility.

6.4. FUEL AND CHEMICAL STORAGE FACILITIES

An inventory of remaining fuel will be made, and full drums will be inspected and secured for the winter. Empty fuel drums and propane cylinders will be flown out for disposal in Yellowknife. Chemicals stored on site include drill additives, oil, grease, and household cleaners. All drill additives will be stored in, or adjacent to, the Drill Foreman Shed and secured for the winter. Household cleaners will be stored in the Kitchen/Dry Facility. Empty containers will be disposed of with regular garbage if deemed safe for on site incineration. The soil of the fuel and chemical storage areas will be inspected for contamination. Any contaminated soil will be collected as outlined in the MMG Spill Contingency Plan and removed from site for proper disposal.

6.5. WASTE AND INCINERATOR FACILITY

The site has forced air, diesel-fired incinerators that are used on a daily basis to dispose of burnable domestic and industrial waste products. Once the camp is dismantled, and remaining buildings secured, all remaining combustible waste stored at this site will either be burned, or flown out to Yellowknife for disposal depending on the type of waste (to either the City of Yellowknife Solid Waste Facility or KBL Environmental). The incinerator will be cleaned and winterized. The soil surrounding the Waste and Incinerator Facility will be inspected for contamination. Any contaminated soil will be collected as outlined in the MMG Spill Contingency Plan and removed from site for proper disposal.

6.6. GREYWATER SUMP

The Kitchen/Dry Facility Greywater Sump will be cleaned out and wood cover will be secured for winter.

6.7. BLACKWATER SUMP

Not Applicable. Human waste is collected and incinerated in a forced air diesel fired incinerator. The camp toilets are “pacto” style toilets where waste is collected in a plastic bag lined container. The bags are collected and burned on a daily basis in the forced air incinerator located onsite. Pactos will be cleaned and the Bathroom Facility buildings sealed for winter.

6.8. HELICOPTER PAD

The helicopter pad consists of a wooden platform built of a 2x4 base with plywood cover. Soil around the helicopter pad will be inspected for contamination. Any contaminated soil will be collected as outlined in the MMG Spill Contingency Plan and removed from site for proper disposal.

6.9. CAMP SITE

Soil contaminated by hydrocarbons will be collected as outlined in the MMG Spill Contingency Plan and removed from site for proper disposal. Drill core that is to be left on site will be properly stored and secured in cross stacked piles or wooden cores racks.

6.10. FLOAT DOCK AND TUNDRA AIRSTRIP

The Float Dock will be pulled from the location on High Lake and stored above the high-water mark for use in subsequent field seasons. No materials will be left in the water or below high water mark in periods of inactivity. All materials will be stored in closed buildings or anchored to the ground to reduce windblown disbursement. The Tundra Airstrip will be marked by anchored cones to designate a safe taxiway for off-strip aircraft. The cones will be left in place for safe operation of mobilization flights in subsequent field seasons.

6.11. DRILLING AREAS RESTORATION

The drill will be dismantled into its main components as per the drilling contractor procedure, packaged and secured along with its ancillary equipment and rods. The drill will be left on solid ground until the following season. All drill sites will be inspected for soil contamination. Any contaminated soil will be collected as outlined in the MMG Spill Contingency Plan and removed from site for proper disposal. Any remaining waste will be taken to camp to be burned and/or flown out to Yellowknife for disposal depending on the type of waste (to either the City of Yellowknife Solid Waste Facility or KBL Environmental). Sumps will be backfilled and graded to natural contours. As much as possible, drill sites will be restored as soon as possible after the drill has been moved to the next site and sumps have drained enough to be backfilled and graded.

6.12. DOCUMENTATION

Equipment and buildings left on site will be inventoried. Before and after photos will be taken of all camp and drill sites. Monitoring will be done during occupancy and photos taken. Once the site has been secured for the winter, it will again be documented with photos.

7.0 FINAL CLOSURE AND RECLAMATION PLAN

7.1. BUILDINGS AND CONTENT

All the reusable equipment such as tents, tent metal frames, stoves, kitchen stove, refrigerator, kitchen appliances and equipment, showers, hot water tank, etc. will be packaged and flown out from the camp site to Yellowknife. Wood structures such as outhouses, pump shack, sheds and tent wooden floors, beds and tables will be dismantled and burned or flown out to Yellowknife for disposal. Nails, screws, anchors and other non-combustible parts will be recovered, packaged and flow out for disposal. Only paper products, paperboard packing and untreated wood wastes shall be designated for open burning. Open burning will be conducted, if possible, on a bedrock or other surface intended to reduce scorching of the tundra. Open burning will only be conducted when permits are obtained where required.

7.2. WATER SYSTEM

Pumps, tanks, and hoses will be drained, dismantled, packaged and flown out to Yellowknife. The wooden pump shack built to protect the pump will be burned or flown out to Yellowknife for disposal. Only paper products, paperboard packing and untreated wood wastes shall be designated for open burning. Open burning will be conducted on a surface intended to reduce scorching of the tundra. Open burning will only be conducted after any required permits have been obtained.

7.3. ELECTRICAL SYSTEM

The Generator Shed will be inspected for remaining hazardous waste (oil, grease) and the generator will be drained of its fuel. Remaining waste fuel and oil will be collected, sealed in containers and flown out to Yellowknife for disposal (at KBL Environmental). The shed will be dismantled and burned or flown out to Yellowknife for disposal. The soil in the Generator Shed area will be inspected for contamination and any contaminated soil will be collected as outlined in the MMG Spill Contingency Plan and removed from

site for proper disposal. Electrical wires, sockets, etc. will be taken down and returned with camp materials to Yellowknife. Only paper products, paperboard packing and untreated wood wastes shall be designated for open burning. Open burning will be conducted on a surface intended to reduce scorching of the tundra. Open burning will only be conducted when permits are obtained where required.

7.4. FUEL AND CHEMICAL STORAGE FACILITIES

The Fuel Storage Area consists of segregated groups of drums with empties separate from full drums. At final closure an inventory of all remaining fuel will be conducted, and fuel drums will be inspected. Full and empty drums will be flown out for disposal or sale in Yellowknife. Propane cylinders will be flown out for disposal or sale in Yellowknife. Remaining waste fuel, stored in properly labeled drums, will be flown out to a fuel outlet or discharge that accepts this type of fuel. Unused drilling additive, oil or grease will be flown out and returned to the drilling company. Half empty containers will be taken off site to be properly disposed in an approved facility in Yellowknife. Empty containers will be collected, flown out to Yellowknife and disposed of with regular garbage at the City of Yellowknife Solid Waste Facility. Any contaminated soil will be collected as outlined in the MMG Spill Contingency Plan and removed from site for proper disposal.

7.5. WASTE FACILITY AND INCINERATOR

Once the camp is entirely dismantled, all remaining combustible waste stored at this site will be burned or flown out to Yellowknife for disposal. The incinerator (if present) will be dismantled, reusable parts will be returned to Yellowknife and the waste discarded (to either the City of Yellowknife Solid Waste Facility or KBL Environmental). Only paper products, paperboard packing, and untreated wood wastes shall be designated for open burning. Open burning will be conducted on a surface intended to reduce scorching of the tundra. Open burning will only be conducted when permits are obtained where required. Any contaminated soil will be collected as outlined in the MMG Spill Contingency Plan and removed from site for proper disposal

7.6. GREYWATER SUMP

The Kitchen/Dry Facility Greywater Sump will be backfilled and graded to blend in with the surrounding topography.

7.7. BLACKWATER SUMP

Not Applicable. Human waste is collected and incinerated in a forced air diesel fired incinerator. The camp toilets are “pacto” style toilets where waste is collected in a plastic bag lined container. The bags are collected and burned on a daily basis in the forced air incinerator located onsite. For final closure, all remaining waste bags will be burned in the incinerator, the pacto toilets will be cleaned and removed from site. If an outhouse was used, it will be limed and backfilled. Although not historically employed, if a blackwater sump was constructed and used, it would be limed and backfilled.

7.8. HELICOPTER PAD

Soil around the helicopter pad will be inspected for contamination. The wood will be burned or flown out to Yellowknife for disposal (to either the City of Yellowknife Solid Waste Facility or KBL Environmental). Only paper products, paperboard packing, and untreated wood wastes shall be designated for open burning. Open burning will be conducted in designated burn barrels in order to avoid scorching of the tundra. Open burning will only be conducted when permits are obtained where required.

7.9. CAMP SITE

After all materials, facilities and structures have been dismantled and removed, the camp site will have a final inspection. Soil contaminated by hydrocarbons will be collected as outlined in the MMG Spill Contingency Plan and removed from site for proper disposal. Disturbed areas where there is no vegetation cover will be scarified to create a rough and loose surface that will create microsites for natural seed deposition and plant establishment, and loosen the ground material to enable root growth. The scarified areas will conform to the natural topography. Drill core to be left on site will be properly stored and secured.

7.10. FLOAT DOCK AND TUNDRA AIRSTRIP

Where employed, the float dock will be pulled from water and all anchors to shore will be removed. The floatation chambers will be recovered from the structure and flown to Yellowknife. Any wooden frame materials will be dismantled and burned. All markers designating the Tundra Airstrip will be removed and all effects of aircraft landings will be removed, restoring the area to its natural state.

7.11. DRILLING AREAS RESTORATION

The drill will be dismantled into its main components as per the drilling contractor procedure, packaged and secured along with its ancillary equipment and rods. The drill will be flown out to a location designated by the drilling contractor. All drill sites will be inspected for soil contamination and any contaminated soil will be collected as outlined in the MMG Spill Contingency Plan and removed from site for proper disposal. Any remaining waste will be taken to camp to be burned, if possible, or to be flown out to Yellowknife for disposal at an approved facility (to either the City of Yellowknife Solid Waste Facility or KBL Environmental). Greywater and sludge sumps will be backfilled and graded. As much as possible, drill sites will be restored as soon as possible after the drill has been moved to the next site and sumps have drained enough to be back-filled and graded. Following completion of exploration activities, remaining drill pipe collars or drilling pipe steel casings that are above ground surface on land and do not contain instrumentation (e.g., thermistors), will be removed. The collars/casings will be cut off as close to the ground surface as possible. The remaining below grade portions of the collars/casings will be filled with cement and capped with soil raked in from the surrounding area to cover the remaining collars/casings. The capping material and adjacent drilling area will be graded and contoured to blend in with the surrounding topography and surface will be left in a rough and loose condition that will promote natural vegetation establishment. The cut off portions of the collars/casings will be collected and flown to an approved disposal or recycling facility in Yellowknife.

7.12. DOCUMENTATION AND INSPECTION

Photos of the camp and drill sites will be taken prior to building or drilling. During the exploration and closure phases, monitoring of the sites will be undertaken by inventorying and photographing materials, facilities and structures present on site. Upon completion of final closure activities, site conditions will be documented with photos. A final site inspection with community representatives, the Nunavut Land Use Inspector and Nunavut Water Board staff will be organized by MMG.

8.0 REFERENCES

MMG Resources Inc., 2021. MMG Spill Contingency Plan, Exploration Operations, High Lake Property, Nunavut, Canada. Latest Revision August 2021.

HIGH LAKE RECLAMATION ESTIMATE - October 2022

ACTIVITY/MATERIAL	UNITS	QUANTITY	UNIT COST	COST	TOTALS
SUMMER					
Drilling Decommissioning					
DRILLHOLE DECOMMISSIONING					
Drillhole quantity	DDH	50			
Personnel - cut casing below grade, fill casing w/ cement, backfill/cover casing	Staff Days	15	\$ 700	\$ 10,500	
Helicopter support	Hours	12	\$ 2,650	\$ 31,800	
Grinder	Days	6	\$ 25	\$ 150	
Generator	Days	6	\$ 37	\$ 222	
Cement	Bags	100	\$ 10	\$ 1,000	
RECLAMATION TREATMENTS - Drilling collar sites					
Personnel (Reclamation Treatments) - Rake/scarify/loosen ground surface.	Staff Days	5	\$ 700	\$ 3,500	
Helicopter support (drilling collar sites)	Hours	4	\$ 2,650	\$ 10,600	
Subtotal Drillhole Decommissioning				\$ 57,772	\$ 57,772
Buildings and Equipment					
BUILDINGS/EQUIPMENT DECOMMISSIONING					
Personnel- disassemble buildings, burn wood, sort and pile materials.	Staff Days	50	\$ 700	\$ 35,000	
ATV & trailer support (Exploration camp sites)	Days	10	\$ 300	\$ 3,000	
RECLAMATION TREATMENTS - Exploration Site					
Personnel (Reclamation Treatments) - Rake/scarify/loosen ground surface.	Staff Days	10	\$ 700	\$ 7,000	
ATV & harrows support (Exploration camp sites)	Days	2	\$ 300	\$ 600	
Subtotal Buildings and Equipment				\$ 45,600	\$ 45,600
Mobilization and Camp Operation					
MOBILIZE/DEMOBILIZE TO SITE					
Personnel - Overland Transport	Travel Days	12	\$ 700	\$ 8,400	
Twin Otter Flight	Flights	2	\$ 12,000	\$ 24,000	
CAMP OPERATION					
Personnel/staff- camp cook/medic	Cook Days	16	\$ 700	\$ 11,200	
Fuel (propane)	Lump sum	1	\$ 1,000	\$ 1,000	
Food/materials	Staff/Cook Days	96	\$ 120.60	\$ 11,578	
Subtotal Mobilization and Camp Operation				\$ 56,178	\$ 56,178
WINTER					
PREPARATION					
Personnel - set up/build ice airstrip for Dash 7	Staff Days	30	\$ 700	\$ 21,000	
Building and Equipment					
EQUIPMENT AND BUILDINGS					
Personnel - Load materials for transport off site, disassemble and packup remaining materials and buildings, burn remaining wood	Staff Days	60	\$ 700	\$ 42,000	
Personnel - repair D6 dozer to make operable	Staff Days	1	\$ 800	\$ 800	
Personnel - walk the to Blue Star Gold Corp. Ulu Gold Property	Staff Days	12	\$ 700	\$ 8,400	
SUPPORT/CARGO					
Diesel fuel for CAT D6 bulldozer	Litres	1000	\$ 3	\$ 3,000	
Dash 7 cargo flights	Lump sum	1	\$ 275,650	\$ 275,650	
Hercules C130 cargo flight (for D6 bulldozer)	Lump sum	1	\$ 50,000	\$ 50,000	
Subtotal Buildings and Equipment				\$ 400,850	\$ 400,850
Mobilization and Camp Operation					
MOBILIZE/DEMOBILIZE TO SITE					
Personnel - Overland Transport	Travel Days	10	\$ 700	\$ 7,000	
Twin Otter Flight	Flights	2	\$ 12,000	\$ 24,000	
CAMP OPERATION					
Personnel/staff - camp cook/medic	Cook Days	25	\$ 700	\$ 17,500	
Fuel (propane)	Lump sum	1	\$ 2,000	\$ 2,000	
Food/materials	Staff/Cook Days	128	\$ 120.60	\$ 15,437	
Subtotal Mobilization and Camp Operation				\$ 65,937	\$ 65,937
DISPOSAL COSTS					
Chemicals, Contaminated Soils, and Waste Materials					
FUEL					
Disposal once off-site: diesel, Jet A/B, aviation gas	Litres	1,022	\$ 0.50	\$ 511	
WASTE OIL					
Oils/lubricants - disposal once off-site	Litres	1,022	\$ 0.50	\$ 511	
OTHER CHEMICALS					
Antifreeze, refrigerant, cleaners, drilling chemicals, etc.	Litres	408	\$ 0.50	\$ 204	
CONTAMINATED SOIL					
Potential contaminated soil from helicopter pads, fuel & chemical storage areas, generators, etc.	m3	5	\$ 76.25	\$ 381	
GENERAL WASTE MATERIALS/GARBAGE					
Waste material that cannot be burnt, but are not contaminated/special waste.	kg	8,159	\$ 0.173	\$ 1,412	
Ash Waste (drums from incinerator)	drum	20	\$ 400	\$ 8,000	
Subtotal Chemicals and Contaminated Soils				\$ 11,018	\$ 11,018

HIGH LAKE RECLAMATION ESTIMATE - October 2022

CLOSURE

PERMITTING & CLOSE OUT REPORT	Lump sum	1	\$	25,000	\$	25,000
Subtotal Closure Costs					\$	25,000
Subtotal Capital Costs to Close					\$	662,354
PROJECT MANAGEMENT (Assumes Third Party Costs)				5% of subtotal	\$	33,118
CONTINGENCY				10% of subtotal	\$	66,235
GRAND TOTAL - CAPITAL COSTS					\$	761,708

NOTES: 2022 Assumptions

- Assumes High Lake Site is closed and reclaimed as final closure for the site.
- That leaving the site will be "phased" exit with more than one season available to complete.
- Phases of reclamation work (3 phases):
 1. Summer - Drilling decommissioning; buildings and materials decommissioning; reclamation activities.
 2. Winter - Buildings and materials decommissioning and removal from site; heavy equipment (D6) removal
 3. Closure reporting.
- That all improvements and assets will be removed and site returned to stable conditions.
- Every effort will be taken to minimize time to complete.
- The estimated weight of materials and equipment to be removed from High Lake Site approximates ~180,000 lbs.
- The salvage value of materials and equipment was not used to offset the reclamation security amount.
- All inflight and return flights will be utilized to deliver or remove materials and optimize transport efforts.
- Unit cost sources are outlined in spreadsheet and, where available, recent and appropriate site-specific data is used.
- Mobilization of staff on/off-site will be principally via Twin Otter to Yellowknife.
- Backhaul removal of materials will be principally completed with Dash-7 aircraft for disposal in Yellowknife. Assumed multiple aircraft available to complete 2 trips/day.
- Work is based on current inventory of diesel fuel at site; assumes that excess fuel will be disposed of off-site.
- 1 staff day = 1 person for 12 hour workday
- Assumed cook is also a trained medic personnel.
- Drill collars removal: quantity based on information provided in September, 2022. Estimate 50 drill collars to remove.
- Summer program: cut steel drill collars and waste materials from drilling collar sites will be slung by helicopter to the exploration camp and stored in piles adjacent to High Lake for later shipping out during the winter program.
- Summer program at the exploration camp: equipment and waste materials will be collected and stored in secure piles adjacent to High Lake for later shipping during the winter program. The majority of the plywood sided buildings and wood material will be burned in place and the ashes/nails collected for disposal in Yellowknife. One or two buildings with heat will be retained for the winter program.
- Winter program: waste materials and equipment stored adjacent to High Lake will be hauled to the aircraft using snowmobiles and the D6 bulldozer. Materials and equipment will be manually loaded into the aircraft.
- Once the winter program is completed, the remaining plywood sided buildings and wood materials will be burned and the ashes/nails collected for disposal in Yellowknife.
- After completion of the winter reclamation program, heavy equipment (CAT D6 bulldozer) will be driven to the BlueStar Gold Corp. Ulu Gold Property. The D6 bulldozer will be transported back to Yellowknife via Hercules C130 aircraft using Ulu's all season airstrip.
- Assumed that MMG will seek and receive any necessary approvals and/or permissions to open burn plywood materials on site.
- Project management cost follows guidance from RECLAIM Costing Model (version 7.0).
- Contingency percentage based on recent reclamation cost estimates for Nunavut mine projects.