



HIGH LAKE PROJECT

2021 Annual Report for Water Licence 2BE-HIG1722

Prepared for
Nunavut Water Board

Prepared by
MMG Resources Inc.

March 2022

HIGH LAKE PROJECT

2021 2BE-HIG1722 Annual Report

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Acronyms

CIRNAC	Crown Indigenous Relations and Northern Affairs Canada
KIA	Kitikmeot Inuit Association
The Licence	Water Licence 2BE-HIG1722
NIRB	Nunavut Impact Review Board
NWB	Nunavut Water Board
The Project	High Lake Project
MMG	MMG Resources Inc.

Executive Summary - English

MMG Resources Inc. (MMG) has filed its Annual Report on its activities during 2021 under Water Licence No. 2BE-HIG1722 (the Licence) issued by the Nunavut Water Board. As set out in Part B, Item 2 of the Licence, the report includes information with respect to the following topics:

- A summary report of water use and waste disposal;
- A list of unauthorized discharges and a summary of follow-up actions taken;
- Any revisions to plans under this Licence;
- A description of all progressive and or final reclamation work undertaken, if any, including photographic records of site conditions before, during and after completion of operations;
- A report of any artesian flow occurrences;
- Any other details on water use or waste disposal requested by the Board.

$$\Delta_{\mathcal{Q}} \Delta_{\mathcal{Q}'}^{\epsilon_b} \rho_{L'}^{\epsilon_b} - \Delta_{\mathcal{P}^b \cap \mathcal{D}^c} \rho_{\mathcal{D}^c}^{\epsilon_c} \rho_{L'}^{\epsilon_b}$$
[illegible]

- [illegible]

1. Introduction

This report to the Nunavut Water Board (NWB) has been prepared to summarize the project activities and monitoring undertaken by MMG Resources Inc. (MMG) during 2021, in accordance with Part B, Item 2 of License 2BE-HIG1722 (the Licence). The NWB Annual Report Form can be found in Appendix A of this report.

The High Lake Project (Project) has been in long-term Care and Maintenance since 2015 and was not operated in 2021. No freshwater was used, or wastes deposited in 2021. The Project was inspected on August 26, 2021 to ensure it was in a stable and secure state and to conduct necessary repairs/re-securing of infrastructure.

2. Annual Report per Part B, Item 2

This section of the report has been constructed to address each of the requirements of Part B, Item 2 of the Licence. To facilitate direct comparison to the Licence, each subheading corresponds directly with the identically alphabetized subheading of Part B, Item 2 of Water Licence 2BE-HIG1722.

A. SUMMARY OF WATER USE AND WASTE DISPOSAL

No water was used, or waste generated under this Licence in 2021. The Project remained closed throughout 2021.

B. UNAUTHORIZED DISCHARGES AND FOLLOW-UP ACTIONS

No hydrocarbon spills to water or triggering the NWT/NU spill reporting thresholds occurred during this reporting period.

C. REVISIONS TO THE SPILL CONTINGENCY PLAN AND ABANDONMENT AND RESTORATION PLAN

An updated Spill Contingency Plan and Closure and Reclamation Plan are included as Appendix B and C of this report.

D. PROGRESSIVE AND OR FINAL RECLAMATION WORK UNDERTAKEN

In 2021 MMG retained Discovery Mining Services to inspect High Lake on August 26, 2021 to ensure it was in a stable and secure state and to conduct necessary opportunistic maintenance which included boarding over windows. Some repairs from minor weathering damage and wildlife disturbance were conducted. Area was tidied, and plywood placed on entry and exit points. All structures were left closed and secured. The site was determined to be in overall good shape by the contractor.

E. ARTESIAN FLOWS

No drilling took place under this licence during this reporting period and no artesian flows were intercepted.

F. SUMMARY OF ALL INFORMATION REQUESTED AND RESULTS OF THE MONITORING PROGRAM

No monitoring was undertaken in 2021, apart from an overall site inspection conducted to confirm site stability and address any immediate maintenance needs.

G. ANY OTHER DETAILS ON WATER USE OR WASTE DISPOSAL REQUESTED BY THE BOARD BY NOVEMBER 1 OF THE YEAR BEING REPORTED

No Board requests regarding water use or waste disposal were issued by the Board prior to Nov 1, 2021.

However, in the NWB's technical review of High Lake's 2019 and 2020 Annual reports¹, the NWB made one request related to High Lake which is provided below along with MMG's response.

¹ NWB 2021. Letter to MMG RE: NWB Technical Review of 2019 and 2020 Annual Reports for Water Licences Nos: 2BE-HIG1722, High Lake Project; and 2BE-IZO1823, Izok Lake Project. November 2, 2021.

1. ***“.. the Board could not locate any information on reclamation of the historic drilling locations at both High Lake and Izok Lake Projects previously requested by CIRNAC Inspector. The Licensee is strongly advised to address all concerns raised by the Inspector and to provide a summary of completed work within the 2021 Annual Report.”***

MMG is currently preparing a report on the site clean-up activities conducted between 2018 and present. Once complete, MMG will submit this report to the NWB and the CIRNAC Inspector.

Concurrently, MMG is also developing a drill site inventory and reclamation plan to address the historical drill sites. MMG is in communication with the CIRNAC Inspector about the development of this plan and will provide a draft plan to the Inspector in April 2022.

Appendix A NWB Annual Report Form

NWB Annual Report

Year being reported:

Select



2021

License No: 2BE-HIG1722

Issued Date: AUGUST 4, 2017

Expiry Date: AUGUST 3, 2022

Project Name: HIGH LAKE

Licensee: MMG RESOURCES INC.

Mailing Address:

MMG Resources Inc.
PO BOX 91460
West Vancouver, BC,
V7V 3P1

Name of Company filing Annual Report (if different from Name of Licensee please clarify relationship between the two entities, if applicable):

N/A

General Background Information on the Project (*optional):

The site dates to the 1950s when the High Lake gossan was first identified by then Texas Gulf. It has since been explored by several groups. MMG acquired the project through a series of transactions starting with the purchase of Wolfden Resources by Zinifex in 2007. Zinifex later became Oz Minerals and subsequently was bought by MMG in 2009. The last exploration activity conducted from the site was carried out in 2013. The site saw limited occupation over the next two years while reclamation work was carried out. The last occupancy was August 2015. Since that time the Project has been in long term Care and Maintenance.

Licence Requirements: the licensee must provide the following information in accordance with

Part B



Item 2



A summary report of water use and waste disposal activities, including, but not limited to: methods of obtaining water; sewage and greywater management; drill waste management; solid and hazardous waste management. See additional tab "Additional Information".

Water Source(s):	High Lake (domestic) Surrounding (drilling)	
Water Quantity:	5	Quantity Allowable Domestic (cu.m)
	0	Actual Quantity Used Domestic (cu.m)
	95	Quantity Allowable Drilling (cu.m)
	0	Total Quantity Used Drilling (cu.m)

Waste Management and/or Disposal

- ☐ Solid Waste Disposal
- ☐ Sewage
- ☐ Drill Waste
- ☐ Greywater
- ☐ Hazardous

☐ Other:

Additional Details:

No water was used or waste was generated under this Licence in 2021. See Section 2A of the Annual Report

A list of unauthorized discharges and a summary of follow-up actions taken.

Spill No.: (as reported to the Spill Hot-line)

Date of Spill:

Date of Notification to an Inspector:

Additional Details: (impacts to water, mitigation measures, short/long term monitoring, etc)

No spills occurred in 2021. See Section 2B of the Annual Report

Revisions to the Spill Contingency Plan

SCP addendum attached for Board consideration



Additional Details:

See Section 2C of the Annual Report.

Revisions to the Abandonment and Restoration Plan

AR addendum attached for Board consideration



Additional Details:

See Section 2C of the Annual Report.

Progressive Reclamation Work Undertaken

Additional Details (i.e., work completed and future works proposed)

See Section 2D of the Annual Report.

Results of the Monitoring Program including:

The GPS Co-ordinates (in degrees, minutes and seconds of latitude and longitude) of each location where sources of water are utilized;

Not Applicable (N/A)



Additional Details:

No water was used in 2021.

The GPS Co-ordinates (in degrees, minutes and seconds of latitude and longitude) of each location where wastes associated with the licence are deposited;

Not Applicable (N/A)



Additional Details:

No waste was generated in 2021.

Results of any additional sampling and/or analysis that was requested by an Inspector

No additional sampling requested by an Inspector or the Board ▼

Additional Details: (date of request, analysis of results, data attached, etc)

N/A

Any other details on water use or waste disposal requested by the Board by November 1 of the year being reported.

No additional sampling requested by an Inspector or the Board ▼

Additional Details: (Attached or provided below)

See Section 2G of the Annual Report.

Any responses or follow-up actions on inspection/compliance reports

Inspection and Compliance Report received by the Licensee (Date): ▼

Additional Details: (Dates of Report, Follow-up by the Licensee)

No inspections under the Licence were conducted by CIRNAC in 2021.

Any additional comments or information for the Board to consider

Ted Muraro is no longer with MMG Resources Inc. The new MMG contact for this Licence Sarah Hasek.
MMG is currently preparing and application for renewal of this Licence.

Date Submitted:

March 31, 2022

Submitted/Prepared by:

Sarah Hasek

Contact Information:

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Fax:

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Appendix B Spill Contingency Plan



**SPILL CONTINGENCY PLAN
EXPLORATION OPERATIONS
HIGH LAKE PROPERTY
NUNAVUT, CANADA**

August 2021

MMG Resources Inc.

PO Box 91460, STN West Vancouver, West Vancouver, BC V7V 3P1

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1. PREAMBLE

This Spill Contingency Plan has been compiled with respect to the requirements within the Spill Contingency Planning and Reporting Regulations in Northwest Territories as adopted by the Government of Nunavut. The Spill Contingency Plan applies to the High Lake Project operated by MMG Resources Inc. in the Kitikmeot District of Nunavut (Figure 1). The Spill Contingency was originally in place for seasonal exploration operations from 2010 to 2013. The High Lake camp was not opened in 2014 and in 2015 saw a short period of limited occupancy to support reclamation of 10 wood frame tents and one plywood clad structure. Following this reclamation work the site was placed on long term care and maintenance.

All fuel and lubricants have now been removed from site. The Spill Contingency plan is to be revised, and the Contacts (4.0) updated, 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. INTRODUCTION

This Spill Contingency Plan is to provides a plan of action for reasonably foreseeable spill events at the High Lake camp considering the nature of the fuels and other hazardous materials that will be handled during the Company's operations. The plan defines the responsibilities of key response personnel and outlines the procedures for responding to spill in a way that will act to minimize potential health and safety hazards, environmental damage and remediation costs. The plan has been prepared to provide ready access to all the information needed in dealing with a spill.

The objectives of the Plan are to:

- Define the reporting procedures and communication network to be used in the event of a system failure or material spill.
- Define procedures for the safe and effective containment and clean-up/disposal of a system failure or material spill.
- Define specific individuals and their responsibilities with respect to responding to a spill.

It is MMG Resources Inc. policy to comply with all existing laws and regulations to help ensure the protection of the environment, to provide such protection of the environment as is technically feasible, to cooperate with other groups working on protection of the environment and to keep employees, government officials and the public informed.

Personnel will be instructed on the plan upon arrival in camp. Instruction will also be given on how to properly manipulate and store fuel and other hazardous substances and on the location of emergency equipment. A more graphical representation of this plan will be posted in common camp areas.

2.1. ENVIRONMENTAL POLICY

MMG aims to achieve a high standard of care for the natural environment in all the activities in which we engage. MMG undertakes to minimize our impact on the environment

MMG will:

- conduct our operations in compliance with all relevant environmental regulations, licenses and legislation as a minimum condition
- identify, monitor and manage environmental risks arising from our operations
- seek continuous improvement in environmental performance, production processes, waste management and the use of resources
- provide appropriate training and awareness for all employees on environmental issues
- communicate regularly with employees about our aim and about individual responsibilities
- inform our customers and suppliers of our aim and of their responsibilities in relation to our business
- communicate with stakeholders, the community and governments about our environmental performance, and contribute to the development of laws and regulations which may affect our business

3. SITE DESCRIPTION

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 (Figure 1). Access is restricted to fixed wing aircraft of limited capacity on a year-round basis, with larger aircraft capacity seasonally operating from the frozen lake surface. The camp is located on the sloping southwest shore of High Lake and consists of a mix of plywood clad and canvass covered wooden frame structures offering accommodations for up to 40 people (Figure 2 and 3). The camp can support a population of up to 40 people.

Fuel is transported to site seasonally using the frozen lake surface to allow Hercules operations and is then shuttled with a helicopter into the two (North and South) fuel caches on the high ground behind the camp. On site fuel is stored in 205L drums that are stacked no more than 3 high in secondary containment berms. Bungs are positioned to allow inspection of the drums and to avoid leakage. The fuel caches allow for the storage of up to 800 drums on site. All fuel tanks, drums and containers are to be inspected at camp start up. Where not already in place, secondary containment is to be added upon use.

Propane is to be stored in 100lb cylinders within a designated area away from camp. These will be secured to prevent accidental tipping of propane cylinders. Propane is brought to site continually on re-supply flights, with a total number of cylinders stored on site not exceeding 30.

Each of the tents will have a drum of fuel supported on wooden crib. A plastic spill container will be placed below each drum and absorbent matting will be fixed around each bung/fuel supply assembly.

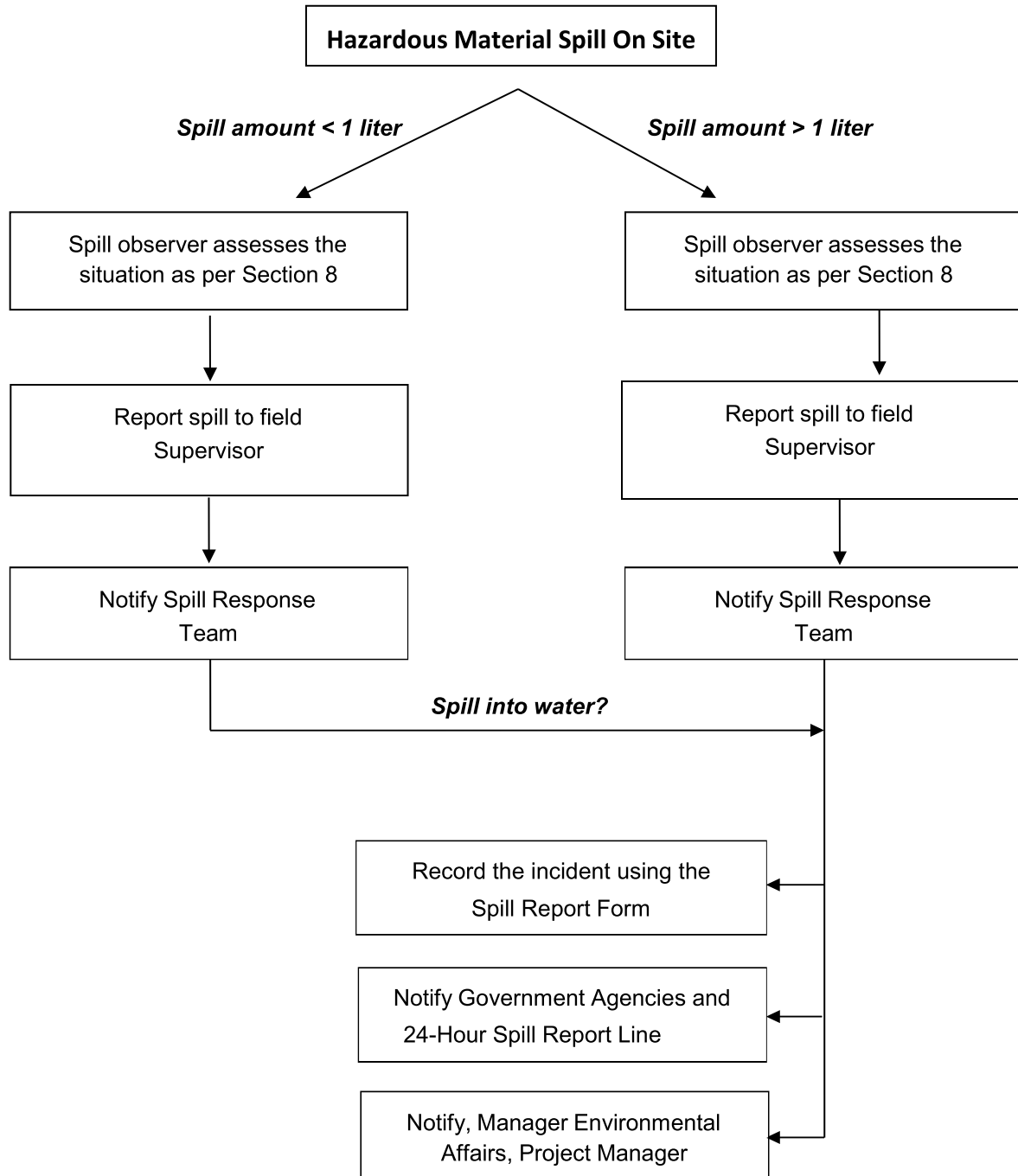
Other chemicals will be securely stored in the camp area, primarily within the drill foreman's work area.

4. CONTACTS

Project Manager	TBA	
Operations Manager	TBA	
Development Manager	TBA	
Exploration Manager	TBA	
Kitikmeot Inuit Association		(867) 983-2458
Nunavut Water Board	Richard Dwyer	(867) 360-6338 (867) 360-6369 (fax)
24-Hour Spill Report Line, Government of Nunavut	(867)-920-8130 (phone) (867)-873-6924 (fax) spills@gov.nt.ca (email)	
Government of Canada – Department of Environment and Natural Resources, Government of the Northwest Territories		(867) 920-8130
Resource Management/Water Resource Officer CIRNAC – Kitikmeot Region	Baba Pedersen	(867) 222-2839
WSCC 24-Hour Incident Reporting line		1-800-661-0792
WorkSafe BC Prevention Information Line		1-888-621-7233
Kugluktuk Health Centre		(867) 982-4531
Kugluktuk RCMP	Emergency line Non-emergency	(867) 982-1111 (867) 982-0123

5. RESPONSE ORGANIZATION

The following is a flow chart to illustrate the sequence of events if a hazardous material spill occurs at the High Lake Project site.



6. SPILL RESPONSE TEAM

All personnel will be informed of the contents of the Spill Contingency Plan and trained in the safe use of relevant spill prevention and clean up equipment. The Field Supervisor will appoint and train two persons to be the Spill Response Team. They will also be responsible to carry out the daily inspections of the fuel storage areas and equipment. Personnel on site will be limited, so for any large spill more people will be brought in to help, from surrounding exploration operations primarily from the IZOK Lake Camp located 200km South of the High Lake Camp and secondly from Yellowknife (Figure 1).

Spill Response Team Responsibilities

- Perform daily inspections at the Camp fuel and chemical storage areas and fuel hoses.
- Report any spill to Project Manager or designate.
- Containment of the spill and site remediation.

Field Supervisor Responsibilities

- Assume complete authority over the spill scene and coordinate all personnel involved.
- Evaluate spill situation and develop overall plan of action.
- Activate the spill contingency plan
- Immediately report the spill to the 24-Hour Spill Report Line and regulatory agencies. (For spill greater than 10 litres)
- Fill out the Spill Report Form (for spill greater than 10 litres)
- Report the spill to the Project Manager. (for spill greater than 1 litre)
- If required, obtain additional manpower, equipment, and material if not available on site for spill response.

Manager, Environmental Affairs Responsibilities

- Provide regulatory agencies and MMG Resources Inc. management with information regarding the status of the clean-up activities.
- Prepare and submit a report on the spill incident to regulatory agencies within 30 days of the event.

7. SPILL PREVENTION

The first line of defence against spills is spill prevention. All efforts to avoid spills will be made by prioritizing preventative measures in the following manner.

7.1. SPILL OF FUEL ON LAND

Steel drums will be stored in such a manner that they will not be susceptible to tipping over, rolling or otherwise being unstable. Care will be exercised so that nothing can cause damage to steel fuel drums by falling or rolling onto or into them. When unloading steel fuel drums from aircraft, the use of a ramp or a cushion (automotive tire) will ensure that the drums are not damaged.

7.2. LEAK OF FUEL FROM RESERVOIR AND DISTRIBUTION LINES

Stability of all reservoir and distribution assemblies is of utmost importance to ensure that the risk of damage is minimized. All stands for reservoirs will be constructed to strength standards beyond those required. Distribution lines from reservoirs to appliances will be fitted with an appropriate shut-off valve immediately downstream from the reservoir. The line will be installed in such a way to prevent being chafed in the wind, chewed on by animals or tripped on by humans. This will be done by securing it to rigid structures, encasing it in armour or any other effective manner. These measures apply broadly to heating oil, gasoline and propane set-ups.

7.3. SPILL OF FUEL ON WATER

Liquid fuel in steel drums will be stored at least 30m back from the lakeshore on hard ground. All care shall be taken when refuelling float planes at the float dock. Fuel will only be brought down to the dock when fuelling is imminent. Partially used drums will be removed from the dock immediately upon completion of fuelling. Absorbent pads will be used both around the rim of the fuel drum and the rim of the aircraft's fuel tank to ensure that any overflow does not enter the body of water. Any spill into a water body, regardless of volume, will be reported immediately.

7.4. RELEASE OF PROPANE

Propane will be stored in appropriate, certified containers. Propane containers will be inspected and monitored on a regular basis for any signs of deterioration or corrosion. Containers will be secured and fastened in an upright position to ensure there is no danger of tipping and eliminating the risk of damage to the regulator in the event of a fall.

7.5. SPILL OF BATTERY ACID

All batteries will be protected from damage by fastening them into the space designed for them when in use and stored safely when not in use. Batteries will be transported in appropriate containers as stipulated under the dangerous goods requirements. Batteries that no longer hold a charge will be flown out and disposed of in the appropriate facilities.

8. INITIAL ACTION

These instructions are to be followed by the first person on the spill scene.

1. Always be alert and consider your safety first.
2. Wear personal protective equipment
3. Do not smoke and eliminate all source of ignition
4. Assess the hazard to people in the vicinity of the spill.
5. If possible control danger to human life
6. Do not touch, smell, taste or get close to unknown substance.
7. If substance has been identified and if possible and safe to do so, try to stop the flow of material.
 - If filling is in progress, stop at once

- If seeping through a small hole, use a patch kit if practical to do so.
 - If necessary and practical, pump the fuel from the leaking container into a refuge container
8. Immediately report the spill to the Field Supervisor and Spill Response Team by radio, satellite phone or in person.
 9. Resume any effective action to contain, mitigate, or terminate the flow of the spilled material.
 10. If in doubt about cleaning procedures or for a very large spill, regulatory agencies can help.

9. REPORTING

The person who notices the spill must immediately notify the Field Supervisor. As soon as possible the Field Supervisor will report the spill to:

- The 24-Hour Spill Report Line Phone (867) 920-8130, Fax (867) 873-6924
- Complete and submit the NT NU Spill Report Form – See Appendix I
- Notify permitting authorities (Nunavut Water Board, Kitikmeot Inuit Association)

10. RESOURCE INVENTORY

A spill kit with a capacity of 240 litres will be located at the fuel tank area and will contain:

- 1 – 360 litre/79 gallon polyethylene drum
- 4 – oil absorbent booms (5" X 10')
- 100 – oil absorbent sheets (16.5" X 20" X 3/8")
- 1 – drain cover (36" X 36" X 1/16")
- 1 – Caution tape (3" X 500')
- 1 – 1 lb plugging compound
- 2 – pair Nitrile gloves
- 2 – pair Safety goggles 2 – pair Tyvek coveralls 1 – instruction booklet
- 10 – printed disposable bags (24" X 48") 1- shovel (in remote spill kit only)
- 1- plastic tarp

Shovels, water pump, plastic pails, garbage bags, extra absorbent pad, drip pans will be placed on the side of the wall at the main office and the kitchen. Fire extinguishers are available throughout the camp facility.

Drill Spill Kits with a capacity of 25 L will contain the following:

- 10 - Pads (17"x19"x2/8")
- 3 -Socks (3"x4')
- 1 -Pair of Gloves
- 1 -Disposal Bags
- 1 -Warning Sign
- 1 -Literature (Inventory List, MSDS, Instructions)

11. HAZARDOUS MATERIAL INVENTORY

This following section lists for each hazardous substance present on the project area, health hazards, spill procedure and disposal procedures. For more detailed information, refer to the MSDS sheets.

11.1. DIESEL FUEL, JET-B, GASOLINE

DIESEL, JET-B AND GASOLINE ARE HIGHLY FLAMMABLE

11.1.1. GENERAL PRECAUTIONS

- Do not smoke
- Will be easily ignited by heat, sparks or flames
- Gasoline and Jet-B are more volatile than diesel
- Explosion hazard indoors, in confined spaces and outdoors
- Vapours may form explosive mixtures with air
- Vapours may travel to source of ignition and flash back
- Most vapours are heavier than air. They will spread along ground and collect in low or confined areas.
- Keep pump or electrical equipment far away, be very careful with metallic tools that could sparks on rocks, wait for vapours to dissipate
- Inhalation may cause central nervous effects
- Aspiration into lungs may cause pneumonitis which can be fatal
- Eye and skin irritation
- Prolonged exposure has caused cancers in laboratory animals

11.1.2. SPILL ON LAND

- Build a containment berm, downslope, using, peat, moss, and soil material, bags filled with sand or rocks and place a plastic tarp at the foot of the berm to pool the spill. Spill can be pumped if in a large amount
- Soak up spilled substance by using absorbent pads
- Excavate the surface soil if necessary. If large excavation is needed, first contact regulatory agencies for approval.
- Remove spill substance splashed on vegetation by applying a thin dusting of Spag-zorb or other ultra-dry absorbent.
- Dispose hydrocarbons, absorbent pad, contaminated soil and cleaning material in an empty drum, seal it and label it.
- On marshy zones, don't destroy vegetal cover, limit personnel and equipment. Remove pooled oil with absorbent pads and/or skimmer.

11.1.3. SPILL ON WATER

- Contain spill as close to release point as possible
- On small spill, deploy hydrophobic absorbent pads

- On larger spill and weather conditions permitting, use containment boom to limit fuel dispersion. Use a skimmer, pump or hydrophobic absorbent pads to remove fuel inside the boom.
- Dispose hydrocarbons, absorbent pad, contaminated soil and cleaning material in an empty drum, seal it and label it.

11.1.4. *SPILL ON RIVERS AND STREAMS*

- Prevent entry into water, if possible, by building a berm or trench.
- Intercept moving slicks in quiet areas using (absorbent) booms.
- Do not use absorbent booms/pads in fast currents and turbulent water.

11.1.5. *SPILL ON ICE AND SNOW*

- Build a containment berm of compacted snow around spill.
- If hydrocarbons are pooling on ice, pump large amount or use hydrophobic absorbent pads.
- Don't delay removing the spill as hydrocarbons could seep through cracks into the water.
- Scrape ice, shovel all contaminated snow in plastic buckets with lids or in drums. Dispose absorbent pads and other contaminated equipment in separated containers. Label and seal the containers.

11.1.6. *SPILL DISPOSAL*

- Contact Federal and Territorial regulatory agencies to identify appropriate disposal methods before disposing of contaminated material.

11.2. PROPANE

EXTREMELY FLAMMABLE

11.2.1. *GENERAL PRECAUTIONS*

- Do not smoke
- Cylinders may explode when heated
- Cylinders may rocket if ruptured
- Will be easily ignited by heat, sparks or flames
- Explosion hazard indoors, in confined spaces and outdoors
- Vapours may form explosive mixtures with air
- Vapours may travel to source of ignition and flash back
- Vapours from liquefied gas are initially heavier than air and spread along ground.
- Contact with gas or liquefied gas may cause burns, severe injuries and/or frostbite
- Keep pump or electrical equipment far away, be very careful with metallic tools that could sparks on rocks, wait for vapours to dissipate
- Liquid may cause frostbites and blisters
- Blurred vision if goes in the eyes
- Narcotic asphyxiation
- Dizziness, disorientation, excitation, headache, vomiting, unconsciousness if inhaled

11.2.2. SPILL ON LAND, WATER, ICE AND SNOW

- Eliminate all source of ignition
- Do not attempt to contain the propane release if not absolutely sure on what to do.
- Do not touch or walk through spilled material
- Stop leak if can be done without risk
- If possible, turn container so that gas escapes rather than liquid.
- Water spray can be used to knock down vapors but don't direct water at spill or source of leak
- Prevent spreading of vapors in confined areas
- If or when possible, confine spill with confinement berm. Throw absorbent pads into spill, retrieved them with gaffs or pitchforks.
- Small fire can be extinguished with dry chemical or CO₂.
- Dispose contaminated materials in a labelled drum.

11.2.3. SPILL DISPOSAL

- Contact Federal and Territorial regulatory agencies to identify appropriate disposal methods for defective equipment that resulted in the release.

11.3. MOTOR OIL, HYDRAULIC OIL, TRANSMISSION FLUID

11.3.1. GENERAL PRECAUTIONS

- Avoid breathing mists, may cause lung irritation
- On skin may cause mild irritation

11.3.2. SPILL ACTION

- Soak up with absorbent material
- Disposed contaminated soil and material in sealed and labelled container
- Small amount can be incinerated
- Large amount to be disposed as hazardous waste.

11.4. ANTIFREEZE

11.4.1. GENERAL PRECAUTIONS

- Respiratory irritation with prolonged exposure.
- Kidney, liver and bladder problems reported in animals

11.4.2. SPILL ON LAND

- Soak up by using absorbent pads
- Dispose antifreeze, absorbent pad, contaminated soil and cleaning material in an empty drum, seal it and label it.
- On marshy zones, don't destroy vegetal cover, limit personnel and equipment. If possible remove pooled antifreeze with absorbent pads.

11.4.3. SPILL ON RIVERS AND STREAMS

- Prevent entry into water, if possible, by building a berm or trench.

11.4.4. *SPILL ON ICE AND SNOW*

- Build a containment berm of compacted snow around spill.
- If pooling on ice, pump large amount or use absorbent pads.
- Don't delay removing the spill as it can seep through cracks into the water.
- Scrape ice, shovel all contaminated snow into plastic buckets with lids or in drums.
- Dispose absorbent pads and other contaminated equipment in separated containers. Label and seal the containers.

11.4.5. *SPILL DISPOSAL*

- Contact Federal and Territorial regulatory agencies to identify appropriate disposal methods before disposing of contaminated material.

11.5. BATTERY ACID

11.5.1. *GENERAL PRECAUTIONS*

- Fire and explosion hazard
- Can be extinguished with dry chemical fire extinguisher.
- Ventilate area
- Remove combustible materials
- Mist inhalation hazard when being charged or spilled
- Acid burns to skin and eyes irritation

11.5.2. *SPILL ACTION*

- Neutralize with soda or lime
- Dispose battery and neutralized contaminated material in a sealed and labelled container
- Dispose as an hazardous waste

11.6. POLY-DRILL DR-133

11.6.1. *GENERAL PRECAUTIONS*

- May cause skin and eye irritation

11.6.2. *SPILL ACTION*

- Soak up with absorbent pad
- Dispose residue, contaminated soil and material in labelled containers. Solidify with sand.
- Small amount can be incinerated, otherwise dispose as hazardous waste.

11.7. 550-X POLYMER

11.7.1. *GENERAL PRECAUTIONS*

- Prolonged skin contact may cause irritation
- Possible eye irritation
- Ingestion may cause nausea, vomiting, cramps, diarrhea

1.1.1. *SPILL ACTION*

- Clean up spill with gloves.
- Scrape soil or surface and disposed in labelled containers
- Dispose as hazardous waste

12. APPENDIX – SPILL REPORT FORM



NT-NU SPILL REPORT

OIL, GASOLINE, CHEMICALS AND OTHER HAZARDOUS MATERIALS

NT-NU 24-HOUR SPILL REPORT LINE

TEL: (867) 920-8130

FAX: (867) 873-6924

EMAIL: spills@gov.nt.ca

REPORT LINE USE ONLY

A	REPORT DATE: MONTH – DAY – YEAR		REPORT TIME		<input type="checkbox"/> ORIGINAL SPILL REPORT, OR <input type="checkbox"/> UPDATE # _____ TO THE ORIGINAL SPILL REPORT	REPORT NUMBER _____
	OCCURRENCE DATE: MONTH – DAY – YEAR		OCCURRENCE TIME			
B	LAND USE PERMIT NUMBER (IF APPLICABLE)		WATER LICENCE NUMBER (IF APPLICABLE)			
C	GEOGRAPHIC PLACE NAME OR DISTANCE AND DIRECTION FROM NAMED LOCATION				REGION	
D					<input type="checkbox"/> NWT <input type="checkbox"/> NUNAVUT <input type="checkbox"/> ADJACENT JURISDICTION OR OCEAN	
E	LATITUDE			LONGITUDE		
F	DEGREES	MINUTES	SECONDS	DEGREES	MINUTES	SECONDS
G	RESPONSIBLE PARTY OR VESSEL NAME		RESPONSIBLE PARTY ADDRESS OR OFFICE LOCATION			
H	ANY CONTRACTOR INVOLVED		CONTRACTOR ADDRESS OR OFFICE LOCATION			
I	PRODUCT SPILLED		QUANTITY IN LITRES, KILOGRAMS OR CUBIC METRES		U.N. NUMBER	
J	SECOND PRODUCT SPILLED (IF APPLICABLE)		QUANTITY IN LITRES, KILOGRAMS OR CUBIC METRES		U.N. NUMBER	
K	SPILL SOURCE		SPILL CAUSE		AREA OF CONTAMINATION IN SQUARE METRES	
L	FACTORS AFFECTING SPILL OR RECOVERY		DESCRIBE ANY ASSISTANCE REQUIRED		HAZARDS TO PERSONS, PROPERTY OR ENVIRONMENT	
M	ADDITIONAL INFORMATION, COMMENTS, ACTIONS PROPOSED OR TAKEN TO CONTAIN, RECOVER OR DISPOSE OF SPILLED PRODUCT AND CONTAMINATED MATERIALS					
N	REPORTED TO SPILL LINE BY POSITION EMPLOYER LOCATION CALLING FROM TELEPHONE					
O	ANY ALTERNATE CONTACT POSITION EMPLOYER ALTERNATE CONTACT LOCATION ALTERNATE TELEPHONE					
REPORT LINE USE ONLY						
P	RECEIVED AT SPILL LINE BY		POSITION		EMPLOYER	
Q			STATION OPERATOR		LOCATION CALLED	
R					YELLOWKNIFE, NT	
S					REPORT LINE NUMBER	
T					(867) 920-8130	
U	LEAD AGENCY <input type="checkbox"/> EC <input type="checkbox"/> CCG <input type="checkbox"/> GNWT <input type="checkbox"/> GN <input type="checkbox"/> ILA <input type="checkbox"/> INAC <input type="checkbox"/> NEB <input type="checkbox"/> TC				SIGNIFICANCE <input type="checkbox"/> MINOR <input type="checkbox"/> MAJOR <input type="checkbox"/> UNKNOWN	
V					FILE STATUS <input type="checkbox"/> OPEN <input type="checkbox"/> CLOSED	
W	AGENCY		CONTACT NAME		CONTACT TIME	
X					REMARKS	
Y	LEAD AGENCY					
Z	FIRST SUPPORT AGENCY					
AA	SECOND SUPPORT AGENCY					
AB	THIRD SUPPORT AGENCY					

PAGE 1 OF _____

13. APPENDIX – FIGURES

Figure 1 – Regional Overview Map

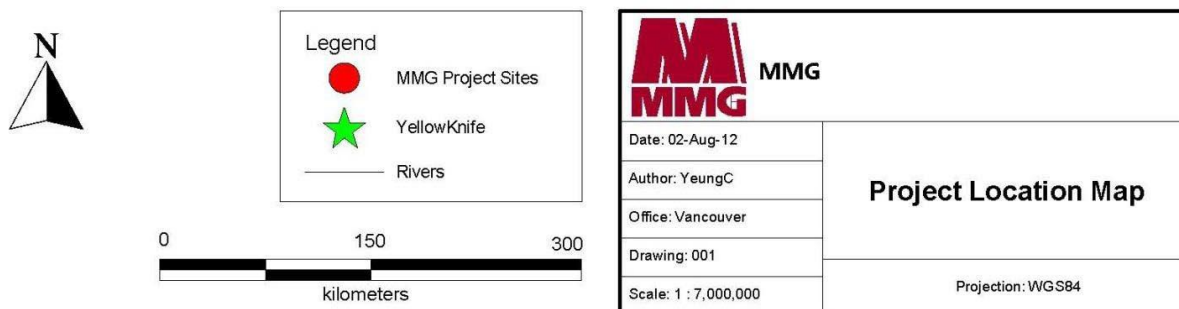
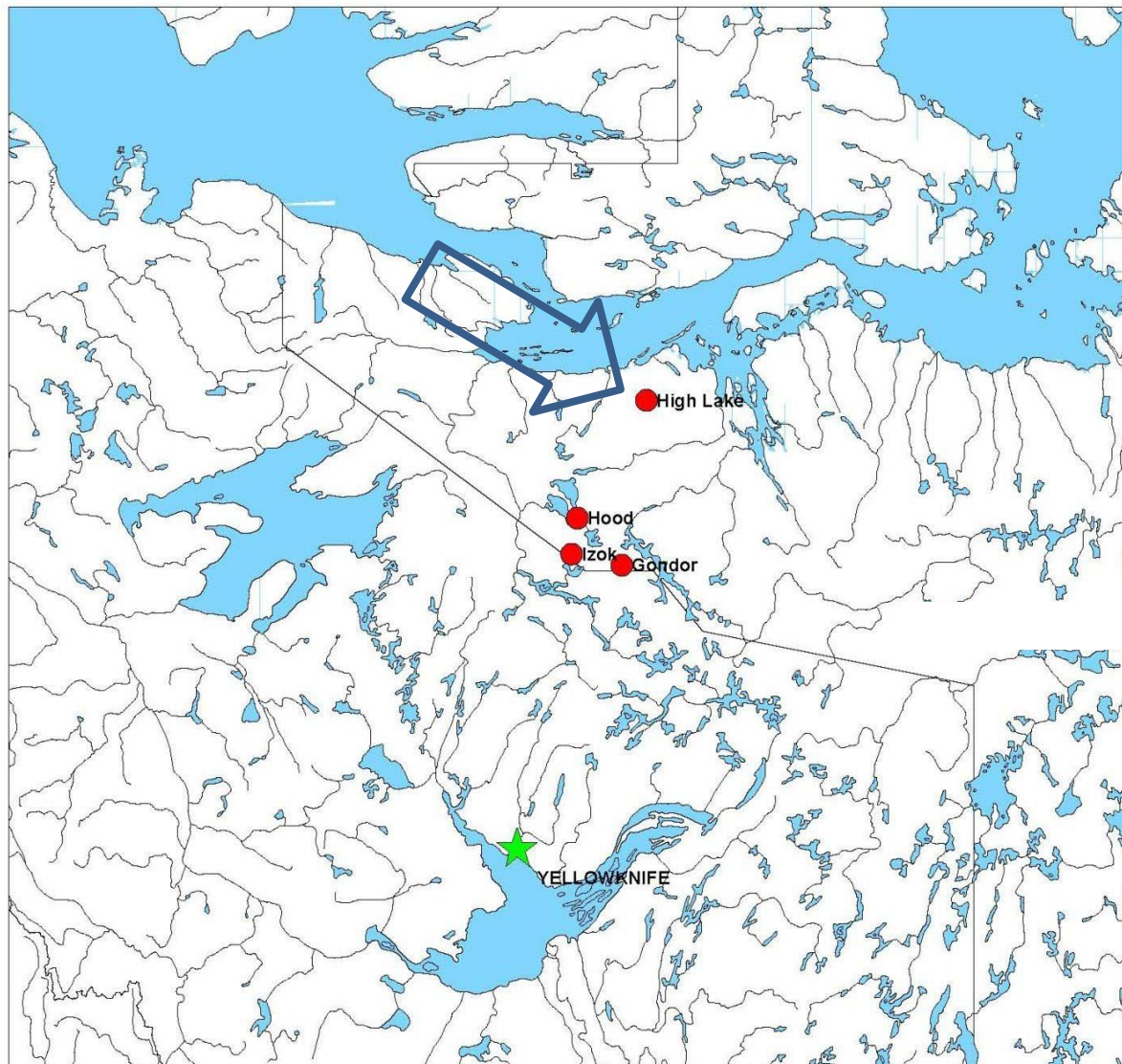


Figure 2 – Historic Layout High Lake Camp

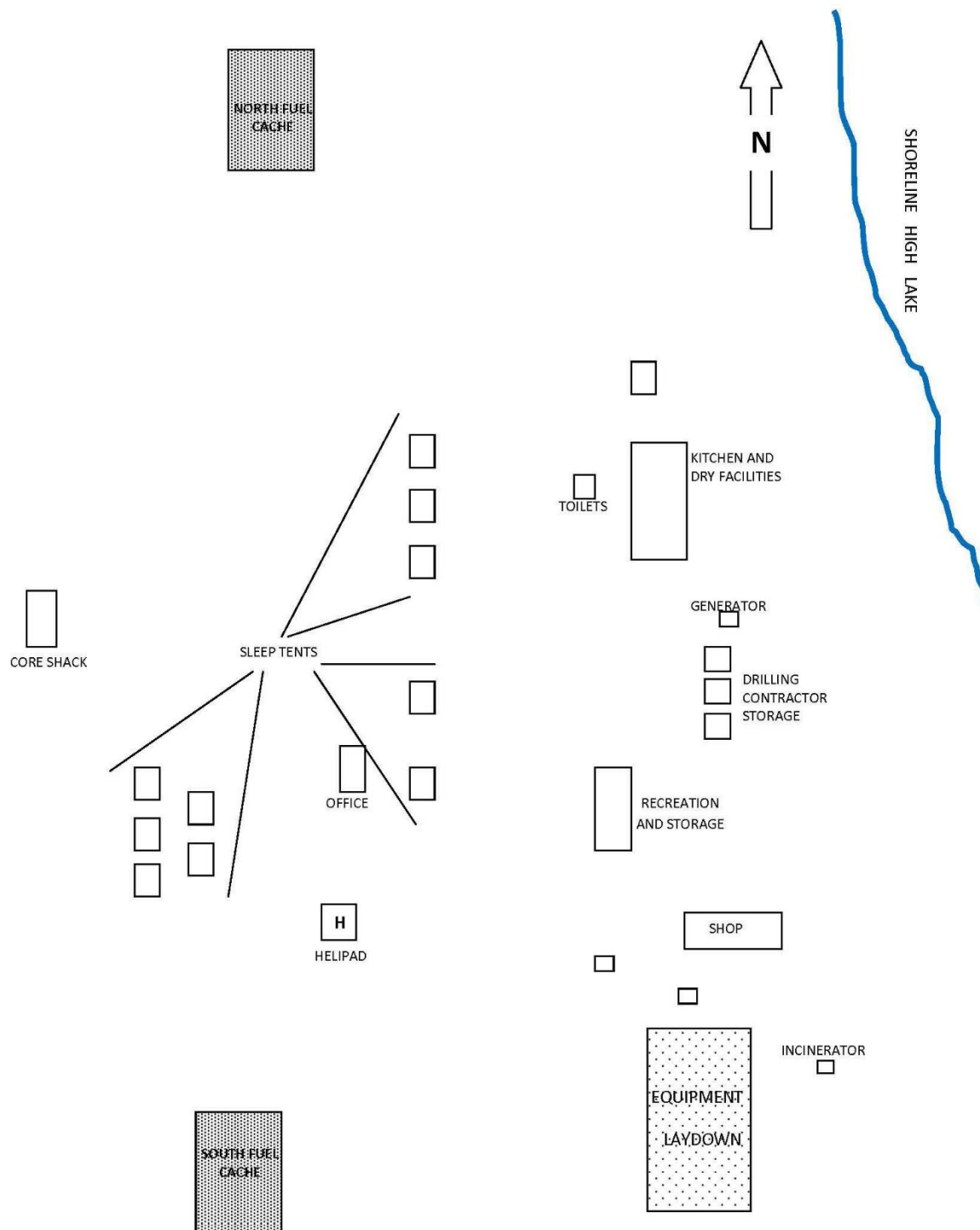


Figure 3 - High Lake Camp site August 2013



14. APPENDIX – MSDS SHEETS

2 Cycle Motor Oil
Antifreeze
Aviation Gas
Barimol Grease
Dexron
Diesel Fuel
Drill Rod Grease
Duratran Engine Oil
Fuel Oil – Gasoline
Fuel Oil – Jet B
Fuel Oil – Kerosene
Linseed Soap
Pellets CaCl
Poly Drill 1330
Poly Drill 133 x
Poly Drill OBX
Propane
Stove Oil
Transmission Fluid
Unleaded Gasoline

A complete set of MSDS information is kept in hardcopy on site. To be provided on request.

Appendix C Closure and Reclamation Plan



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

August 2021

MMG Resources Inc.

PO Box 91460, STN West Vancouver, West Vancouver, BC V7V 3P1

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1.0 PREAMBLE

The Closure and Reclamation Plan applies to the High Lake Project operated by MMG Resources Inc. in the Kitikmeot District of Nunavut (Figure 1). The High Lake camp at the High Lake Project was operated under the Land Use Permit 2007C0009 issued by the Kitikmeot Inuit Association (KIA) and Nunavut Impact Review Board (NIRB). The Closure and Reclamation Plan was originally in place for seasonal exploration operations from 2010 to 2013. The High Lake camp was not opened in 2014 and in 2015 saw 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 to the 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. A site visit is planned for August 2021.

All fuel and lubricants have now all been removed from site. As the site is on long term care and maintenance without occupancy, this Closure and Reclamation Plan is to 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 aircraft capacity seasonally operating from the frozen lake surface. The High Lake camp can support a population of up to 40 people.

This Closure and Reclamation Plan has been presented for use when the project area is re-activated with seasonal mineral exploration programs.

3.0 SCHEDULE

The seasonal shutdown of the camp site should take 5 days to complete and will take place after the all exploration activities have ceased. It should be conducted at 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

Upon activation for use as a mineral exploration operation, the High Lake camp site typically 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
- 8 sleep tents that are wood framed and canvas covered
- 1 generator shack that is wood framed and plywood clad
- 1 bathroom facility that is wood framed and plywood clad

5.0 SEASONAL CLOSURE AND RECLAMATION PLAN

5.1. BUILDINGS AND CONTENT

All equipment will be stored inside the wooden buildings to ensure they will withstand the winter season. Canvas tents will be secured and braced internally to ensure they will withstand snow and wind loads. Tarps over tents are inspected and replaced on a seasonal basis. Tent doors will be wired shut or secured with screws. Wood structures will be secured with nailed plywood over windows and doors to prevent inadvertent opening.

5.2. WATER SYSTEM

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

5.3. ELECTRICAL SYSTEM

The generator shed will be inspected for remaining hazardous waste (oil, grease) and will be drained of its fuel. Remaining waste fuel and oil will be collected in the containers labelled for that usage and used through the summer. These containers will be sealed and removed from site for proper handling and disposal in Yellowknife (at KBL Environmental 867-873-5263). The generator will be winterized and prepared for start-up in spring. The soil surrounding the generator shed will be inspected for contamination. Any contaminated soil will be collected as outlined in site spill plan and removed from site for proper disposal (at KBL Environmental). Electrical wires, plugs and sockets will be stored in the kitchen.

5.4. FUEL AND CHEMICAL STORAGE FACILITIES

An inventory of remaining fuel will be conducted, and full drums will be inspected and secured for the winter. Empty drums will be flown out to source. Secondary containment berms will be inspected, and any damage repaired prior to departure from site. Empty propane cylinders will be flown out to source. Chemical stored on site will consist of drill additives, oil, grease and household cleaners. All drill additives will be stored in or by the drill foreman shed and secured for the winter. Household cleaners will be stored in the kitchen. Empty containers will be disposed of with regular garbage if deemed safe for onsite incineration. The soil of the areas will be inspected for contamination. Any contaminated soil will be collected as outlined in site spill plan and removed from site for proper disposal (at KBL Environmental).

5.5. WASTE FACILITY AND INCINERATOR

The site has a forced air, diesel fired incinerator that is 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 will be inspected for contamination. Any contaminated soil will be collected as outlined in site spill plan and removed from site for proper disposal (at KBL Environmental).

5.6. GREYWATER SUMP

The greywater sump will be cleaned out, grease trap emptied, and wood cover will be secured for winter. Material collected will be appropriately packaged for transport to Yellowknife for disposal (at KBL Environmental).

5.7. BLACKWATER SUMP

The camp toilets are “pacto” style toilets where waste is collected in a plastic bag lined container. The bags are collected and burned daily in the forced air incinerator located onsite. Pactos will be cleaned and the buildings sealed for winter.

5.8. 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 site spill plan and removed from site for proper disposal (at KBL Environmental).

5.9. CAMP SITE

Areas showing evidence of impact from foot traffic will be covered with a layer of peat moss and lightly fertilized to promote natural growth. Soil contaminated by hydrocarbons and unnoticed before closure will be collected as outlined in site spill plan and removed from site for proper disposal (at KBL Environmental). Drill core to be left on site will be properly stored and secured in cross stacked piles or wooden cores racks.

5.10. FLOAT DOCK AND TUNDRA AIRSTRIP

The float dock will be pulled from the location 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. The tundra airstrip will be marked by anchored cones to designate safe taxiway for off-strip aircraft. This will be left in place for safe operation of mobilization flights in subsequent field seasons.

5.11. 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 next

season. All drill sites will be inspected for soil contamination. Any contaminated soil will be collected as outlined in site spill 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 filled and levelled. As much as possible, drill sites will be restored immediately after the drill has been moved to the next site and sumps have drained enough to be levelled.

5.12. 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 secured for the winter, it will again be documented with photos.

6.0 FINAL CLOSURE AND RECLAMATION PLAN

6.1. BUILDINGS AND CONTENT

Reusable equipment including tents, tent metal frames, stoves, kitchen stove, refrigerator, other kitchen appliances and equipment, showers, hot water tank, etc. will be packaged and flown out from project site to Yellowknife. Wood structures such as outhouses, pump shack, generator shed 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 minimize scorching of the tundra. Open burning will only be conducted when permits are obtained where required.

6.2. WATER SYSTEM

Pump, tanks and hoses will be drained, dismantled, packaged and transported 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 minimize scorching of the tundra. Open burning will only be conducted when permits are obtained where required.

6.3. ELECTRICAL SYSTEM

The generator shed will be inspected for remaining hazardous waste (oil, grease) and will be drained of its fuel. Remaining waste fuel and oil will be collected, sealed in containers and flown out to Yellowknife for disposal (KBL Environmental). The shed will be dismantled and burned or flown out to Yellowknife for disposal. The soil will be inspected for contamination and any contaminated soil will be collected as outlined in site spill plan and removed from site for proper disposal. Electrical wires, sockets, etc. will be taken down and returned with camp material 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 minimize scorching of the tundra. Open burning will only be conducted when permits are obtained where required.

6.4. FUEL AND CHEMICAL STORAGE FACILITIES

The fuel storage area consists of segregated groups of drums with empties apart from full drums. Upon closure and reclamation, the full and empty drums will be flow out back to source or to a buyer. Propane cylinders will be flown out to source. Remaining waste fuel, stored in properly labelled 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 returned to the drilling company. Half empty containers will be taken off site to be properly disposed in an approved discharge. Empty containers will be disposed with regular garbage.

6.5. 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 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 minimize scorching of the tundra. Open burning will only be conducted when permits are obtained where required.

6.6. GREYWATER SUMP

The kitchen-dry greywater sump will be inspected, and the grease trap emptied. This collected material will be sealed in a drum for transport to Yellowknife and proper disposal. The sump will be filled in and levelled. If determined appropriate, peat moss will be scattered over the surface.

6.7. BLACKWATER SUMP

Not Applicable. Human waste is collected and incinerated in a forced air diesel fired incinerator. If an outhouse was in use it would be limed and backfilled. Although not historically employed, a blackwater sump would be limed and backfilled.

6.8. 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.

6.9. CAMP SITE

The camp site will have a final inspection. Areas showing too much wearing evidences will be covered with a layer of peat moss and lightly fertilized to promote natural growth. Drill core to be left on site will be properly stored and secured.

6.10. 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 south to Yellowknife. Any wooden frame materials will be dismantled. 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.

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 flown out to a location designated by the drilling contractor. Any disturbed areas will be re-contoured. All drill sites will be inspected for soil contamination and any contaminated soil will be collected as outlined in site spill plan and removed from site for proper disposal. Drill casing, if visible, will be cut off at ground level and capped in an appropriate manner. Any remaining waste will be taken to camp to be burned if possible or to be flown out to an approved municipal discharge. Greywater and sludge sumps will be filled and levelled. As much as

possible, drill sites will be restored immediately after the drill has been moved to the next site and sumps have drained enough to be levelled.

6.12. DOCUMENTATION AND INSPECTION

Photos of camp and drill sites prior to building or drilling will be taken. Monitoring will be done during occupancy and photos taken. Once the site restored, it will again be documented with photos. Soil contaminated by hydrocarbons and unnoticed before abandonment will be treated as per the spill contingency plan. A final site inspection with community representatives, Land Use Inspector and in collaboration with NWB staff will be organized by the permit holder.

6.13. APPENDIX – FIGURES

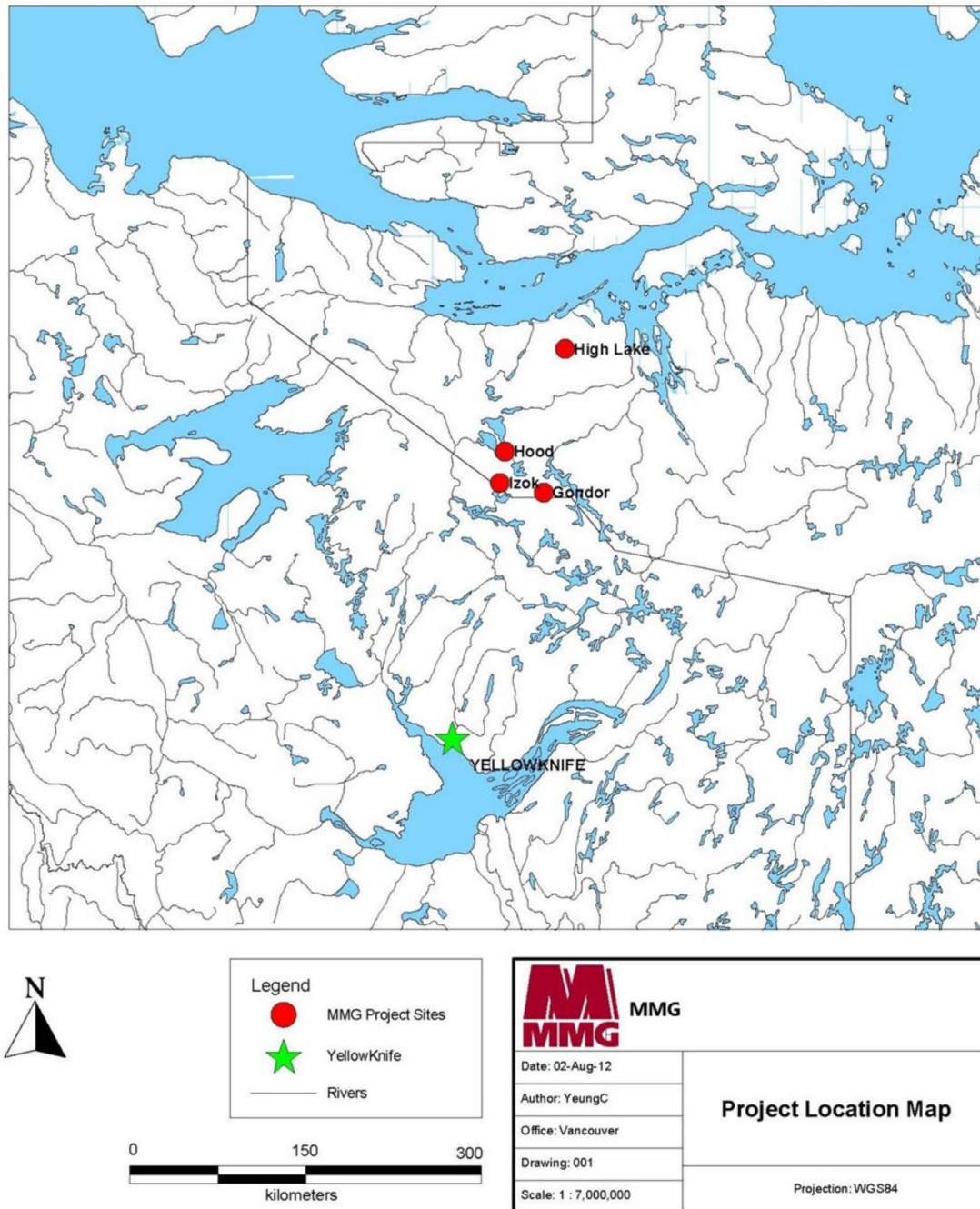


Figure 1. Location Map