Interim Closure and Reclamation Plan

Ulu Gold Project

(including Hood River, Roma and other licensed projects)

Kitikmeot Region, Nunavut

NOVEMBER 2025

BLUE STAR GOLD CORP.

SUMMARY

This *Interim Closure and Reclamation Plan* (the Plan) describes what has been completed since the initial approved plan dated March 2020 and describes what will be done to conduct progressive reclamation, seasonal closure, future final closure, and post-closure activities at the Ulu Gold Project ("Ulu"), near Kugluktuk, Nunavut. This Plan also describes clean-up work associated with Blue Star's exploration activities in the area including drilling and seasonal camp operation.

Previous owners of the Ulu Gold Project intended to mine and transport the ore to the Lupin mill or to a potential mill at High Lake. Underground workings were developed; a bulk sample was brought to surface for testing and waste rock was used to construct infrastructure pads and material laydown areas. Much of the equipment and infrastructure mobilized to site in 1996 is no longer useful, and there has been some contamination of the disturbed areas.

When Blue Star acquired Ulu, the site was in care and maintenance and undergoing some site clean-up. Blue Star has restarted exploration and has been and is currently remediating the site during its exploration programs with the objective of re-establishing the site as an exploration camp with the future optionality to move towards development in the future should that opportunity arise.

Substantial changes of key elements of the interim reclamation plan:

- Contaminated soils initial estimate ~6,000 m^3; current estimate ~1,200 m^3; requires less than 50% of the designed soil treatment facility. Currently using the old, lined tank farm as a holding area regularly aerating the soils with positive results.
- Landfill materials remaining ~250 m^3 and final cover of ~3,150 m^3 of coarse esker.
- ML/ARD or PAG rock identified as Priority 1, Priority 2 and other; created an interim pile (~5,000 m^3) of potential PAG rock and PAG rock from Camp 3 Road, Culvert Six and from clearing rock from the West Lake drainage; not all rock in the pile is considered at risk for ML/ARD.

Blue Star is requesting a reduction in security from $2.629 million to $1.709 million.

REVISION HISTORY

Revision #	Date	Section	Summary of Changes	Author	Approver
2BM-ULU2030, 2BE-HRP1932					
4	2025	All Sections	Revision of all sections and tables to include activities and findings the previously approved version. Includes updates to proposed timelines, equipment status, associated work and costing. Appendix A is now Geochemical Guidance Report Appendix B is Contaminated soils memo Appendix C is the draft Landfill report Appendix D is the updated cost estimate	Blue Star SRK Consulting (Appendix A, C, D)	Blue Star
3	2024	Summary Revisions History	Adjusted footer Minor formatting and non-technical edits	Blue Star	Blue Star
		All Sections	Revision of all sections to include activities and findings from previous version. Includes updates to proposed timelines, associated work and costing.	Blue Star	Blue Star
		Table 2	Updated to include work to date, current status and expected future activities	Blue Star	Blue Star
		Appendix A	Updated with most current geochemical monitoring document	Blue Star	Blue Star
		Appendix B	Updated with most current soil characterization report	KEL	Blue Star

		Appendix C	Updated reclamation cost estimate; inflation adjustment	D.Godley, SRK	Blue Star
2	Mar 2021	Summary Revision History Sections 1.0, 1.1, 1.2, 2.3.1, 4.2.4, 12 Table 1	Amalgamated existing approved Hood River Abandonment and Restoral Plan with the existing Ulu Interim Closure and Reclamation Plan into 1 document for operational efficiency as all activities will be centralized and based out of Ulu. Changes throughout to reflect name of project, related activities and authorizations. Content provided is consistent with existing approved plans.	S. Hamm	D. Lindsay
		Sections 1.4, 6.2, 6.3, 6.5, 9.1 Tables 2, 9	Replaced calendar year (ie. 2020, 2021) with program year (Year 1, Year 2)		
		Section 4.2	Updated contact info.		
		Throughout	Minor non-technical edits and formatting for readability and consistency with other Blue Star management plans		
2BE-HRP1924					
1	Apr 2019	Abandonment and Restoration Plan	Approved July 15, 2019	Blue Star Gold Corp.	
2BE-HRP1419					
2	Sep 2015	Abandonment and Restoration Plan	Approved March 7, 2016	WPC Resources Inc.	
1	May 2014	Abandonment and Restoration Plan	-	WPC Resources Inc.	
2BM-ULU2030					
1	Mar 2020	Interim Closure and Reclamation Plan	Approved May 15, 2020	Blue Star Gold Corp.	
2BM-ULU1520					
4	Mar 2018	Progressive Reclamation Plan	-	Bonito Capital Corp.	
3	Sep 2017	Progressive Reclamation Plan	-	Bonito Capital Corp.	
2	Mar 2016	Interim Closure and Reclamation Plan	-	Bonito Capital Corp.	

1	Mar 2013	Interim Closure and Reclamation Plan	Approved May 13, 2015	Bonito Capital Corp.
2BM-ULU0914				
2	May 2014	Care and Maintenance Plan	-	Bonito Capital Corp.
1b	Aug 2011	Interim Abandonment and Restoration Plan	-	Elgin Mining Inc.
1a	Aug 2011	Care and Maintenance Plan	-	Elgin Mining Inc.
NWB1ULU0008/2BM-ULU0008				
4	Nov 2007	Abandonment and Restoration Plan	-	Zinifex Canada Inc.
3	Jan 2004	Interim Abandonment and Restoration Plan	Approved October 16, 2006	Wolfden Resources Inc.
2	Apr 2001	Interim Abandonment and Restoration Plan	Approved January 7, 2004	Echo Bay Mines
1	Aug 1998	Interim Abandonment and Restoration Plan	-	Echo Bay Mines

TERMS AND ABBREVIATIONS

Abbreviation	Term
°C	Degrees Celsius
F1	Petroleum Hydrocarbon fraction F1 encompasses the equivalent normal straight-chain hydrocarbon boiling point rangeC6 to C10
F2	Petroleum Hydrocarbon fraction F2 encompasses the equivalent normal straight-chain hydrocarbon boiling point range >C10toC16
F3	Petroleum Hydrocarbon fraction F1 encompasses the equivalent normal straight-chain hydrocarbon boiling point range >C16toC34
F4	Petroleum Hydrocarbon fraction F1 encompasses the equivalent normal straight-chain hydrocarbon boiling point range >C34 to C50+
FCP	Final Closure Plan
ICRP	Interim Closure and Reclamation Plan
IOL	Inuit Owned Land
KIA	Kitikmeot Inuit Association
ML/ARD	Metal leaching and acid rock drainage
NIRB	Nunavut Impact Review Board
NPC	Nunavut Planning Commission
NWB	Nunavut Water Board
PAG	Potentially Acid Generating
PHC	Petroleum Hydrocarbon
STF	Soil treatment facility

CONCORDANCE TABLE: ULU PROGRESSIVE RECLAMATION COST ESTIMATE

Interim Closure and Reclamation Plan				Closure Cost Estimate				Reference Documents
	Task	Subtask Section No.	Subtask	Section No.	Section	Subtask No.	Subsection	
	Progressive Reclamation Measures	6.3	Mine Workings	1	Direct Costs	1.5	Mine Workings	-
		6.4	Mine Sump	1	Direct Costs	1.4	Ore Management	-
		6.5	Ore and Waste Rock	1	Direct Costs	1.4	Ore Management	Appendix A: Ulu ML-ARD 2024 Monitoring Report, Ulu, Nunavut. Prepared by SRK Consulting for Blue Star Gold Corp. March 19, 2025
		6.5	Ore and Waste Rock	2	Indirect Costs	2.2	ML/ARD Investigation	Appendix A: Ulu ML-ARD 2024 Monitoring Report, Ulu, Nunavut. Prepared by SRK Consulting for Blue Star Gold Corp. March 19, 2025
		6.6	Infrastructure and Equipment	1	Direct Costs	1.1. & 1.2	Building Demolition Non-Hazardous Landfill	*Landfill Management Plan*
		6.7	Hazardous Materials and Contaminated Soil	1	Direct Costs	1.6	Hazardous Material Management	Appendix B: 2024 Limited Phase II Environmental Site Assessment Ulu Gold Mine Project. Prepared by KBL Environmental Ltd. for Blue Star Gold Corp. September 20, 2024
		6.7	Hazardous Materials and Contaminated Soil	1	Direct Costs	1.3	Soil Treatment Facility	*Soil Treatment Facility Management Plan*
		6.8	Borrow and Quarry Materials	1	Direct Costs	1.7	Borrow and Quarry	*Borrow Pits and Quarry Management Plan*
		6.9	Monitoring and Maintenance	2	Indirect Costs	2.3 & 2.4 & 2.9	Monitoring and Reporting Management and QA/QC Contingencies	Water License 2BM-ULU2030 *Landfill Management Plan* *Soil Treatment Facility Management Plan*

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1.0 INTRODUCTION

Blue Star Gold Corp. ("Blue Star") is undertaking exploration activities and conducting progressive reclamation in the Kitikmeot Region of Nunavut on the Ulu Gold Project ("Ulu"), which now includes both the previously known Ulu Gold Project and the Hood River Gold Project. Blue Star also conducts regional exploration on the Roma Project ("Roma"); activities are based out of the Ulu camp and undertaken in the local area (the "Project").

Blue Star's near-term plans are to undertake mineral exploration locally and regionally and to undertake progressive reclamation of the Ulu site. This revised *Interim Closure and Reclamation Plan* ("ICRP"; the "Plan") is intended exclusively for use by Blue Star and its contractors. Its purpose is to ensure that best practices to minimize potential environmental impacts and liabilities during progressive reclamation and exploration activities are implemented, and to ensure that the conditions of the water and land use licences are met in all work areas, including camps, fuel caches, airstrip, reclamation work area, quarries and drill sites. The ICRP should be read in conjunction with the documents listed in Table 1, which may be updated from time to time.

Blue Star and its wholly owned subsidiaries, Ulu Mining Inc. ("Ulu Mining") and Inukshuk Exploration Inc. ("Inukshuk") hold all Project authorizations. For the purposes of this document and other Project-related documents, Blue Star, Ulu Mining and Inukshuk may be used interchangeably. In 2019, Blue Star changed its name; it was previously known as WPC Resources Inc.

Table 1. Related project documents, permits and licenses.

Document	Authors
Landfill Management Plan	Blue Star Gold Corp.
Soil Treatment Facility Management Plan	Blue Star Gold Corp.
Engagement Plan	Blue Star Gold Corp.
Spill Response Plan	Blue Star Gold Corp.
Waste Management Plan	Blue Star Gold Corp.
Borrow Pits and Quarry Management Plan	Blue Star Gold Corp.
Wildlife Protection Plan	Environmental Dynamics Inc.
Interim Water Management Plan	Gartner Lee Ltd.
Mining lease, mineral claims	Government of Canada
Mineral Exploration Agreement	Nunavut Tunngavik Incorporated
Screening Decision Reports	Nunavut Impact Review Board
Water Licenses	Nunavut Water Board
Land Use License	Kitikmeot Inuit Association
Advanced Exploration Lease	Kitikmeot Inuit Association

1.1 OVERVIEW

The Ulu site is located in the Kitikmeot region of Nunavut, approximately 200 km southeast of Kugluktuk, Nunavut (see Figure 1). Underground works and exploration at Ulu were conducted in 1996, 1997, 2005, and 2006. Since 2006, the Ulu camp has been reopened to support surface exploration and progressive reclamation activities in 2012, 2014, and annually since 2018. Blue Star acquired the Ulu Project from

Bonito Capital Corp. and the water licence was assigned December 2019. Blue Star is now responsible for activities associated with the Project, including the implementation of this Plan.

The Hood River area has been explored intermittently since 1960. The mineral tenure is currently held by Inukshuk, under a mineral exploration agreement with Nunavut Tunngavik Incorporated ("NTI"), and is contiguous with the Ulu mining lease. Initially as WPC Resources Inc., Blue Star commenced exploration at Hood River in 2014 and subsequently established a temporary seasonal camp in 2019. The Hood River temporary camp was reclaimed during the 2021 season and all subsequent work has been undertaken from the Ulu camp.

Ongoing exploration activities local to Ulu and Hood River, as well as those occurring throughout the region, such as Blue Star's Roma project (mineral claims and mineral exploration agreement with NTI acquired in 2021, 2023), will be based out of the Ulu camp and may involve temporary and seasonal satellite camp(s) and fuel cache establishment in accordance with requisite licence terms and conditions.

1.2 SCOPE

This ICRP provides details of Blue Star's current plan to continue exploration activities while concurrently progressively reclaiming the site to support exploration activities yet also allowing for potential future mine development. The Plan predominantly describes the procedures for progressive reclamation and temporary closure of Ulu, and outlines considerations for future final closure at Ulu. Additional measures pertaining to seasonal temporary and final closure of additional exploration related facilities (Hood River and Roma) is also addressed. Unless otherwise specified, the majority of this plan applies specifically to the Ulu site; aspects pertaining to Hood River, Roma and other regional activities are specifically addressed in Section 12.0.

1.3 OBJECTIVES

Blue Star's team endeavours to fulfill its reclamation and closure objectives for the Project. Accordingly, the objectives of this plan are to:

- Ensure employees and contractors are aware of their responsibilities regarding progressive reclamation, temporary closure of the site, and associated monitoring activities.
- Outline appropriate measures to remediate areas affected by petroleum hydrocarbons and to treat the contaminated materials.
- Outline appropriate measures to manage, in the near term and longer term, potential metal leaching and acid generating materials.
- Outline appropriate measures to dispose of infrastructure no longer necessary for ongoing exploration at the site.
- Outline potential scenarios and studies required for future final closure of the site.

1.4 PROJECT SCHEDULE

The Project currently is a surface exploration site with historical underground workings. Table 2 outlines the revised Project schedule as currently envisioned by Blue Star. Table 3 outlines the changes between the 2020 Project Schedule and the current Project schedule. Exploration activities are expected to continue in the near term and a potential camp relocation may be deferred until a potential future development path is identified, both are contingent upon a variety of factors that include safety, logistics, conditions on site, exploration success, and market conditions.

Table 2. Project Schedule.

Year	Summary Main Project Activities
1[1]	Continue surface exploration. Complete potentially contaminated soils sampling below the current PHC soil holding area (old Ulu Tank Farm). Deposition of final lift of non-hazardous waste in land fill. Stage materials identified for disposal via proposed Grays Bay Road and monitor. Close the landfill at the end of each season. Consider stockpiled ore as PAG rock and manage accordingly. Develop interim storage pile for PAG/AG rock on ore pad. Develop long term waste rock (PAG rock) management plan. Conduct monitoring in accordance with water and land use licenses terms and conditions.
2	Continue surface exploration. Evaluate select portions of the Flood deposit for potential open pit mining approach. Construct a soil treatment facility. Excavate and treat petroleum hydrocarbon contaminated soils. Treatment of contaminated soil in the soil treatment facility. Monitor staged materials for disposal; monitor proposed Grays Bay Road progress. Use of remediated contaminated soils according to re-use criteria in Landfill or PAG rock interim storage pile. Close the landfill at the end of each season. Seek approval and implement long term waste rock (PAG rock) management plan. Complete reclamation research to evaluate requirements and options for future final closure of site roads, constructed pads, and historical mine openings. Conduct monitoring in accordance with water and land use licenses terms and conditions
3	Continue surface exploration. Continue potential open pit evaluation. Monitor staged materials for disposal; monitor proposed Grays Bay Road progress. Continuing treatment of contaminated soil in the soil treatment facility. Use of remediated contaminated soils according to re-use criteria in Landfill or PAG rock interim storage pile. Commence limited baseline environmental studies. Conduct monitoring in accordance with water and land use licenses terms and conditions.
4 - 6	Continue exploration. Complete potential open pit evaluation. Continue treatment of contaminated soil in the soil treatment facility. Close the soil treatment facility. Monitor staged materials for disposal; monitor proposed Grays Bay road progress. Dispose of remaining non-hazardous waste in the landfill (i.e., soil treatment facility liner). Close the landfill. Place final cover on the landfill. Continuing baseline environmental studies. Water license renewal. Conduct monitoring in accordance with water and land use licenses terms and conditions. Relocate the Ulu camp to a new location closer to the airstrip.
7 onwards	Monitor staged materials for disposal; monitor proposed Grays Bay Road progress. Continue exploration. Continuing baseline environmental studies. Conduct monitoring in accordance with water and land use licenses terms and conditions.

[1]Year 1 generally corresponds with this revision, once approved.

Table 3. Changes in Project Schedule 2020-2024.

Year	Summary of 2020 ICRP Project Activities	As of Sept 2025
1 (2020)	Recommence surface exploration. Construct a soil treatment facility. Excavate and treat petroleum hydrocarbon contaminated soils. Establish an on-site landfill for the disposal of non-hazardous materials. Implement selected management option for the stockpiled ore. Assess alternate camp locations. Close the landfill at the end of each season. Initiate reclamation research to evaluate requirements and options for future final closure of site roads, constructed pads, and historical mine openings. Conduct monitoring in accordance with water and land use licenses terms and conditions.	Exploration – recommenced Soil Treatment Facility ("STF") not created; pad for the STF partially created on ore pad. Hydrocarbon contaminated soils identified in 2019 were stored in the old bulk tank berm ("soil holding area"). Ore from the ore pad was moved near the mine retention pond and partially placed in the retention pond. Monitoring for compliance undertaken according to license terms and conditions.
2 (2021)	Continue surface exploration. Continue treatment of contaminated soil in the soil treatment facility. Close the landfill at the end of each season. Relocate the Ulu camp to a new location closer to the airstrip. Commence limited baseline environmental studies. Conduct monitoring in accordance with water and land use licenses terms and conditions	Surface exploration continued. Soil Treatment Facility not created; contaminated soil piles evaluated by KEL. Landfill (non-hazardous) established. No baseline environmental studies were initiated. New potential camp locations reviewed. Conduct monitoring in accordance with water and land use licenses continued. Research into ML/ARD options initiated.
3-6 (2022, 2023, 2024, 2025)	Continue surface exploration. Commence underground exploration. Undertake mine development planning. Continue treatment of contaminated soil in the soil treatment facility. Conduct monitoring in accordance with water and land use licenses terms and conditions.	Surface exploration continued. No underground exploration commenced. No mine development planning commenced. Added section to landfill and filled voids with subsurface reuse soils from soil storage area; covered with clean esker. Organized usable and non-usable equipment on the site. No STF built, however stored soils have been aerated each year with an excavator and sampled by KEL. No baseline environmental studies were initiated. Ore pad PAG pulled back, piled, covered including limestone (West Lake drainage). Research into ML/ARD options continued and became a priority over other reclamation activities. Conduct monitoring in accordance with water and land use licenses continued.
7 Onwards	Continue exploration. Continue baseline environmental studies. Conduct monitoring in accordance with water and land use licenses terms and conditions.	Planned: Ore pad PAG pullback, pile, cover including limestone (East Lake drainage). Priority 2

		Finalize long term PAG rock management plan. Move PHC pad soils into holding area, aerate and sample. Continue surface exploration Evaluate potential mine development Continue treatment of contaminated soil in the soil treatment facility. Commence limited baseline environmental studies. Conduct monitoring in accordance with water and land use licenses terms and conditions.

1.5 PLAN MANAGEMENT

The Plan is reviewed annually by Blue Star's Project Manager and is updated as needed following receipt of or amendments to licenses and permits, to ensure alignment with relevant terms and conditions. When material changes occur, the updated document will be provided to parties in accordance with the *Engagement Plan*.

1.6 PLAN IMPLEMENTATION

This Plan is effective upon approval and is valid throughout all phases of the Project. The Project Manager or their designate is responsible for Plan implementation. A copy of this Plan is posted in key locations at the site while the camp is open. All employees and contractors conducting progressive reclamation and monitoring activities will be made aware of its contents.

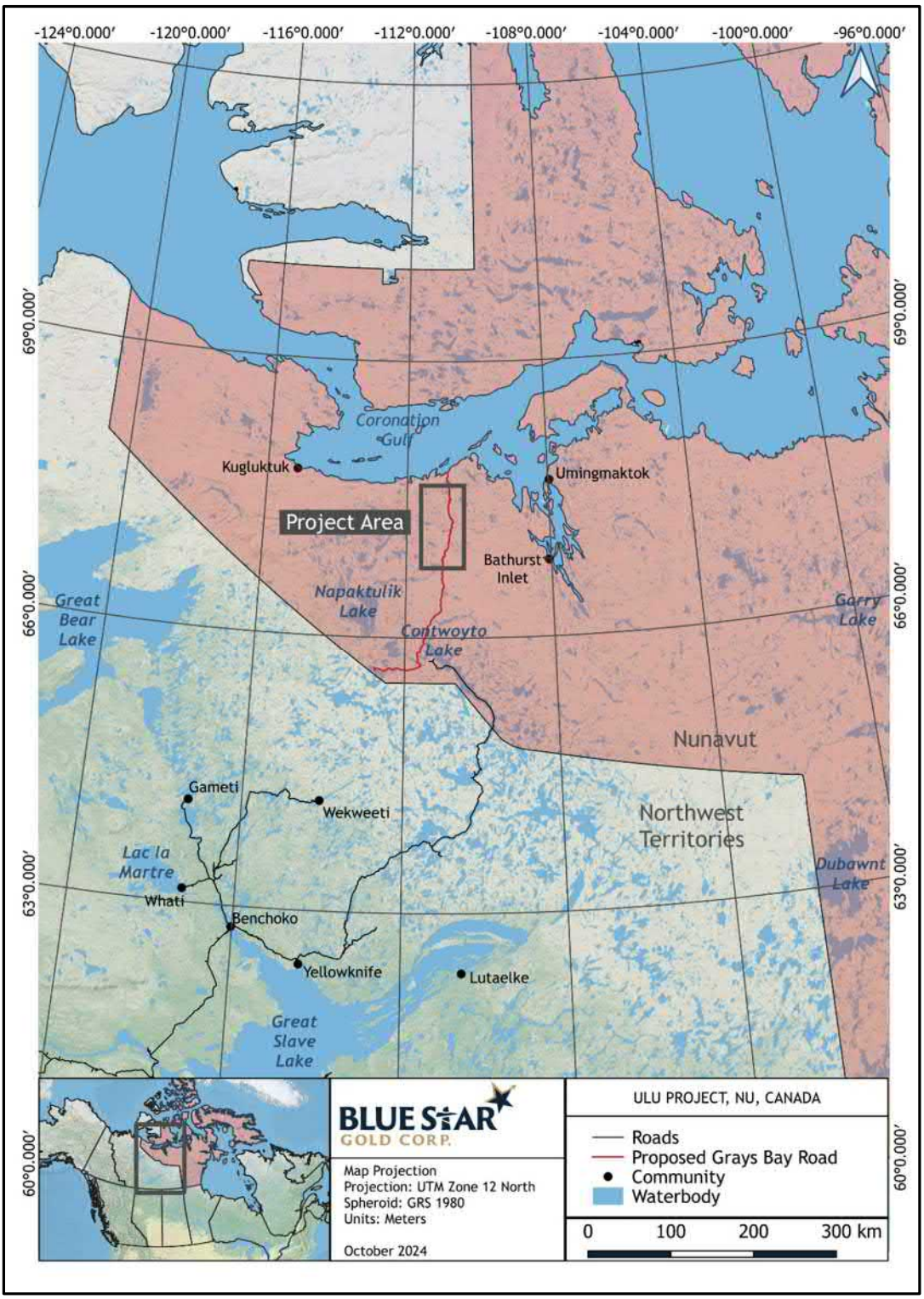


Figure 1. Ulu Gold Project site location map.

2.0 SITE DESCRIPTION

2.1 LOCATION AND ACCESS

The Project is located in the Kitikmeot region of Nunavut, approximately 523 km north–northeast of Yellowknife, Northwest Territories, approximately 45 km north of the Arctic Circle, and 126 km north of Lupin mine. The Project is centred at Ulu, at longitude 110°58'24 "W and latitude 66°54 '27"N. The closest population centres are Kugluktuk, approximately 200 km to the northwest, and Cambridge Bay, approximately 340 km to the northeast. The proposed deep-water port at Grays Bay is located 100 km to the north.

The Project is accessible by aircraft. A 3.5 km gravel road connects the 1,300 m by 32 m gravel airstrip to the Project. Float- and ski-equipped aircraft may also land on adjacent lakes. A winter road was constructed from the Lupin mine to the site to transport equipment and may be re-established as a winter trail in the future. The proposed route corridor for the all-weather Grays Bay Road passes in close proximity to the Project. Figure 2 illustrates the location of the overland routes.

2.2 PAST DEVELOPMENT ACTIVITIES

The original Ulu claim was staked in 1988 by BHP Minerals Canada Ltd. ("BHP") and the current Ulu mining lease corresponds to the original claim. The Flood Zone was discovered in 1989 and environmental baseline studies commenced in 1990.

Echo Bay Mines Ltd. ("Echo Bay") purchased the Ulu project from BHP in 1995 with the intent of developing it to provide mill feed to the Lupin mine. In 1996, Echo Bay mobilized surface and underground equipment and supplies with low-ground pressure, Nodwell and Commander, vehicles to a temporary camp, Camp 3 (Figure 3). In 1996, Echo Bay collared a portal, developed a decline to access the Flood Zone, and completed construction of the Ulu camp (Figure 4). Echo Bay suspended mining operations and surface exploration activities in 1997.

Kinross Gold Corp. ("Kinross") acquired the Ulu project in a business combination with Echo Bay in 2002. In 2003, Wolfden Resources Inc. ("Wolfden") acquired the Ulu mining lease from Kinross. The Ulu camp was reopened to support surface exploration, engineering, environmental and archaeological studies between 2004 and 2006. The portal was reopened in 2005 and 2006.

Wolfden was acquired by Zinifex Ltd. in 2007, which merged with Oxiana Ltd. to become Oz Minerals Limited in 2008. A portion of Oz Minerals' assets, including the Ulu Gold Project, was acquired in 2009 by China Non-Ferrous Metals Co Ltd., Minmetals, the company now operating as MMG Resources Inc. Bonito Capital Corp. ("Bonito"), a wholly owned subsidiary of Elgin Mining Inc., acquired the property in 2011. The Ulu camp was inactive during this period.

In 2012, Bonito refurbished and updated the 50-person camp and kitchen to conduct surface exploration. In 2014, Bonito was acquired by Mandalay Resources Corporation. The Ulu camp has been reopened seasonally since 2015 to conduct care and maintenance work, progressive reclamation, and support surface exploration in the region. Blue Star acquired 100% interest in the Ulu Gold Project in February 2020.

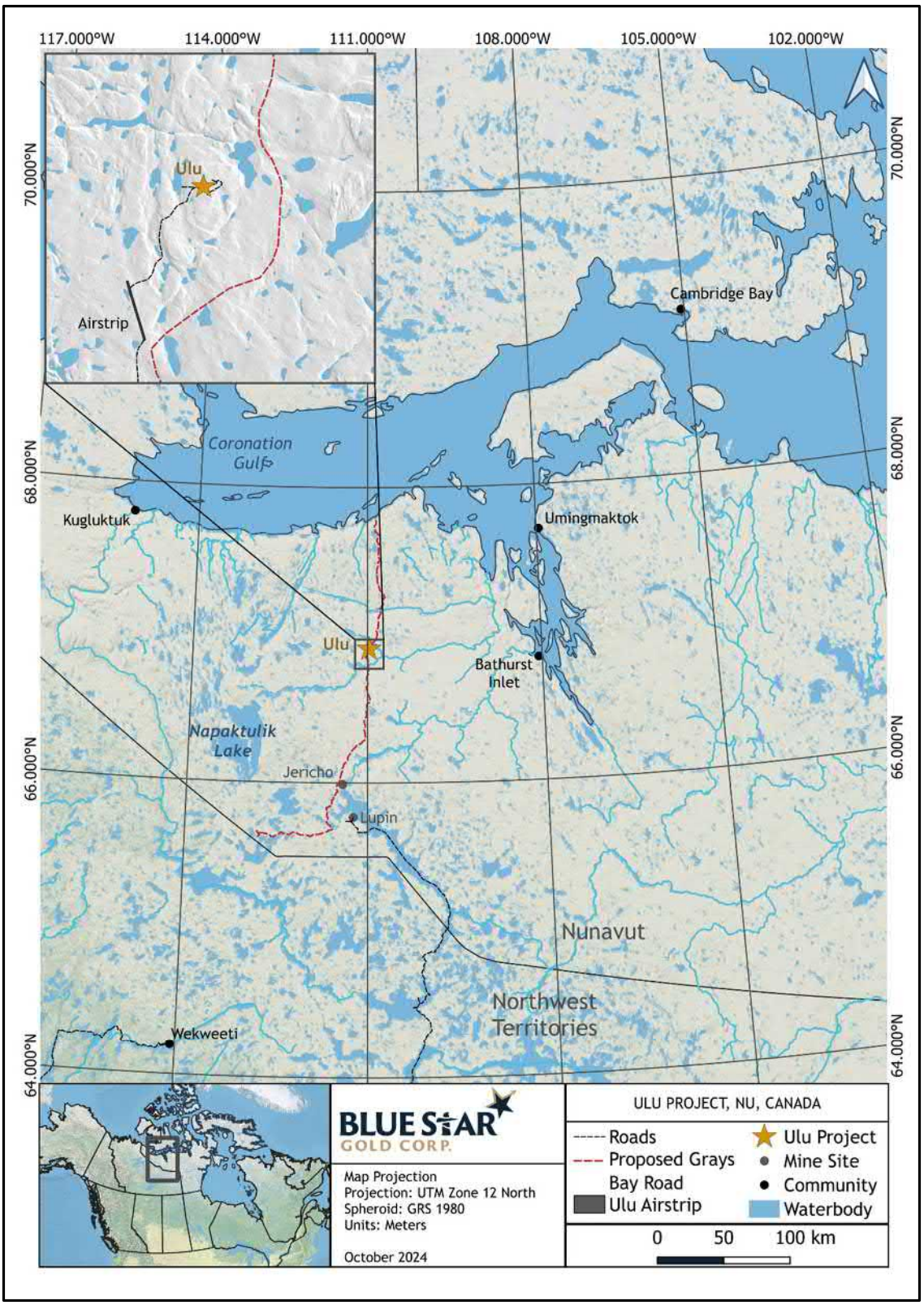


Figure 2. Ulu Gold Project site access.

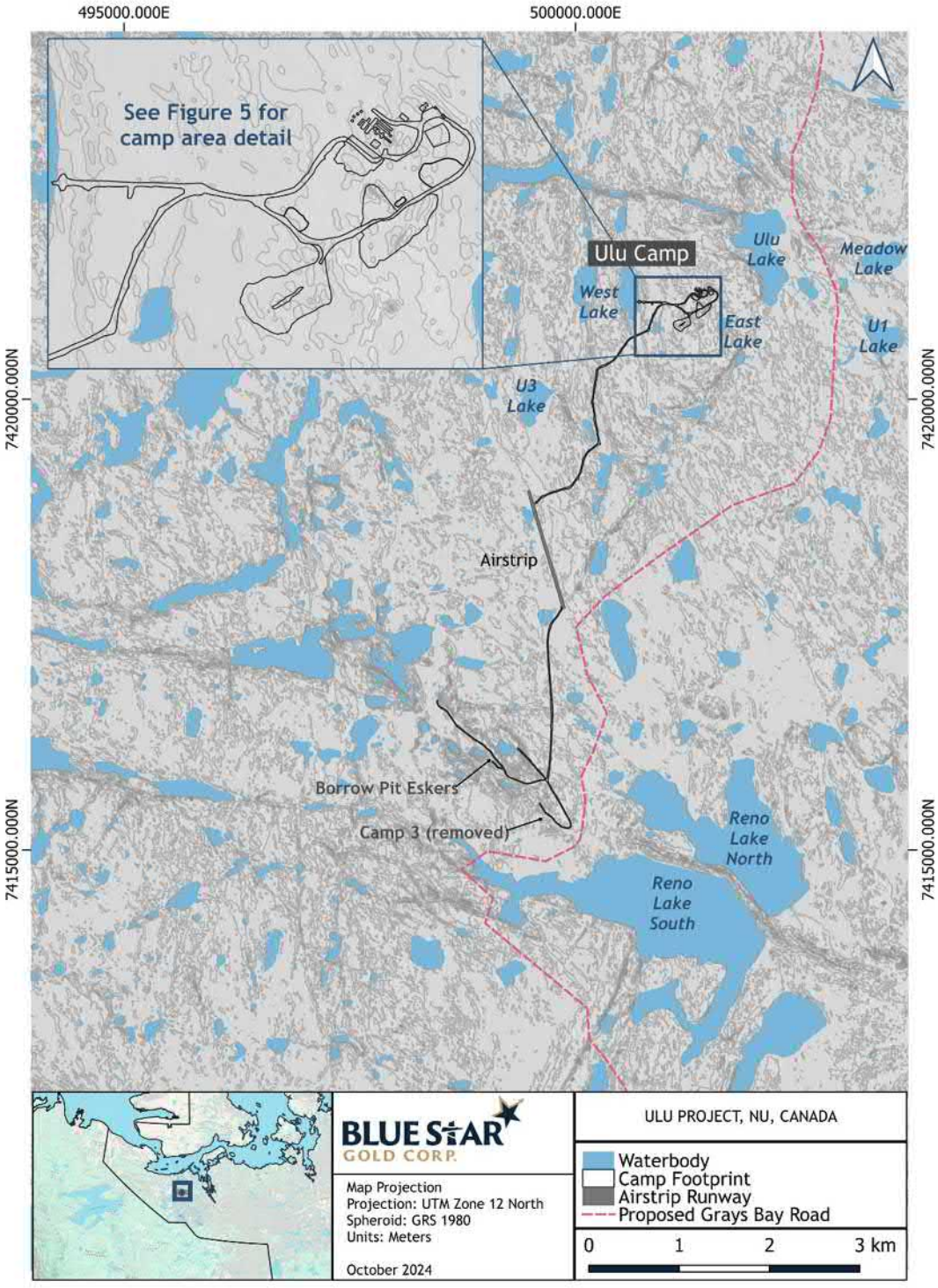


Figure 3. Ulu Gold Project site plan; see Figure 5 for detail of the camp area.

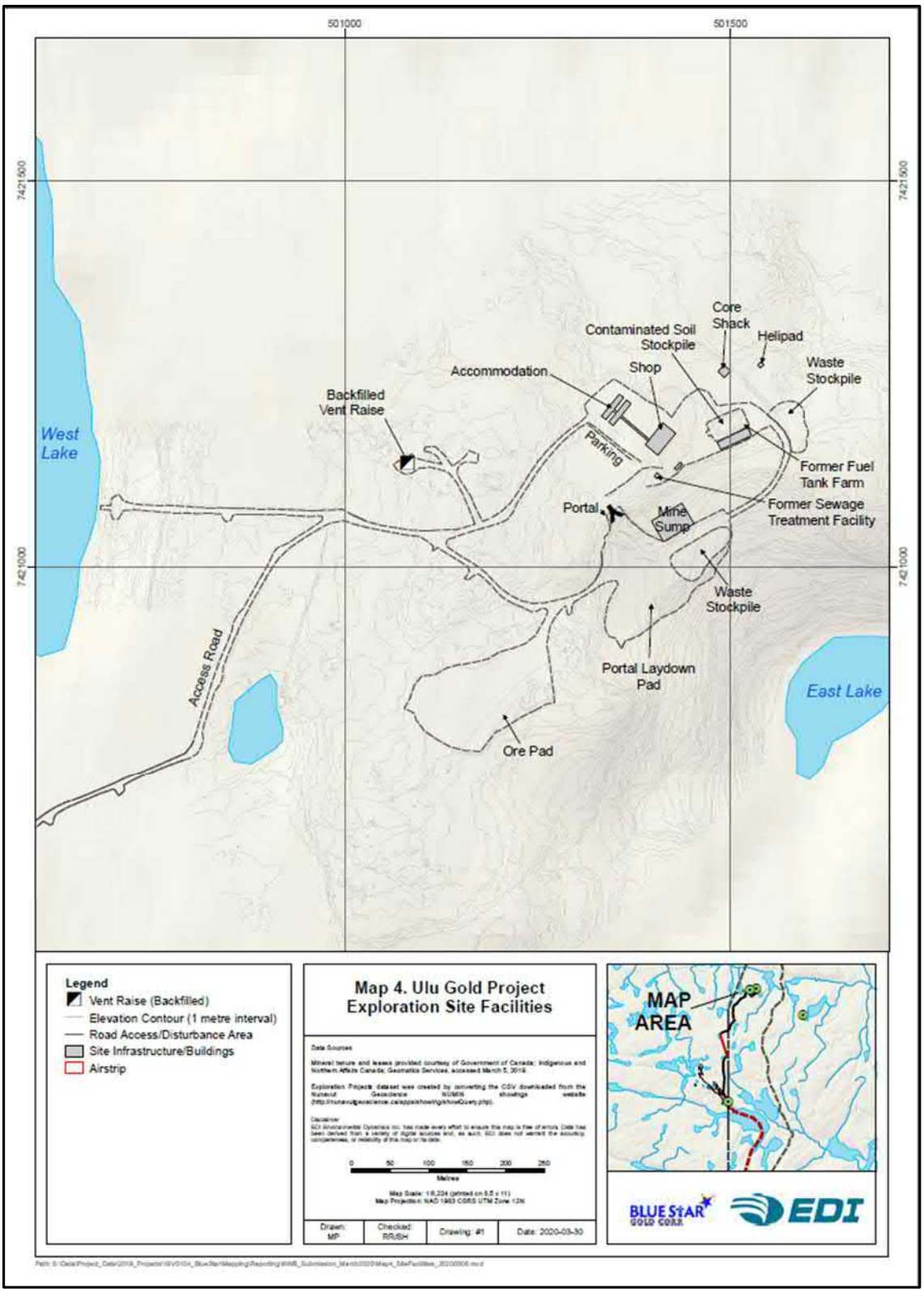


Figure 4. Ulu Gold Project exploration site facilities 2020.

2.3 ONGOING ACTIVITIES

2.3.1 EXPLORATION AND OTHER ACTIVITIES

Concurrent with progressive reclamation of Ulu, Blue Star is undertaking exploration-related activities at Ulu, the adjacent Hood River area, and regionally including the Roma project area, with all activities licenced under either 2BE-HRP1932 or 2BM-ULU2030 (as amended or succeeded). Exploration activities include geophysics, mapping, sampling and drilling. Crews will be based predominantly out of Ulu and may establish temporary satellite camps and fuel caches throughout the regional study area.

Blue Star may also undertake local and regional baseline environmental studies in support of a future impact assessment.

2.3.2 SITE MONITORING AND MAINTENANCE

Site monitoring and maintenance will be carried out in accordance with site authorizations and approved management plans.

2.3.3 CAMP MAINTENANCE

Camp has been maintained and modified since 2019 to make the site more safe and more functional by removing substandard and at-risk camp infrastructure elements remaining from previous owners.

2.3.4 ONGOING PROGRESSIVE REMEDIATION ACTIVITIES

Changes to the camp infrastructure have resulted from the on-going progressive reclamation activities (Figure 5). Progressive reclamation continues in parallel with exploration activities and actively includes the following:

- Demolition or decommissioning of unsafe, non-operational infrastructure or equipment
- On-going evaluation of options for long term PAG rock management.
- On-going ML/ARD monitoring
- Thermal monitoring study of cover thicknesses and cover sequences
- Continued evaluation and management of contaminated pad building materials
- Identification and segregation of contaminated infrastructure soils

2.4 COMPLETED RECLAMATION MEASURES

2.4.1 PRECEDING OWNERS ACTIVITIES

When underground and surface exploration activities were suspended in 1996, Echo Bay (the property owner at that time) relocated some tools, small equipment, and supplies by air to the Lupin Mine. The accommodations at Camp 3 were removed upon the development of the Ulu Camp, with the exception of the garage by Echo Bay. The Ulu site was placed into a care and maintenance status and no progressive reclamation activities were completed until 2014. Since 2014, the preceding owner undertook progressive reclamation of Ulu. At the time of acquisition, the following key activities are understood to have taken place:

- Backhaul of waste and hazardous materials to Yellowknife for offsite disposal.
- Demolition of the Camp 3 fuel tank farm, excavation of the adjacent impacted soil, and relocation of the contaminated soil to the Ulu Camp.

- Removal from service, cleaning, and demolishing all fuel tanks.
- Demolition of accommodations considered by the preceding owner to be unnecessary for future site activities.
- Demolition of the Camp 3 garage.
- Decommissioning of the sewage treatment facility and associated infrastructure.
- Decommissioning of the water supply infrastructure.
- Burning of wood waste.
- Consolidation of the resulting demolition waste into select areas at the Ulu camp.
- Backfilling the vent raise.
- Cutting a number of diamond drill casings flush with the ground.
- Road maintenance repairs.

2.4.2 CURRENT OWNERS ACTIVITIES

Since Project acquisition in 2020, the current owner has undertaken exploration and progressive reclamation of Ulu in parallel. Since the time of acquisition, the following key activities have taken place:

- Backhaul of waste and hazardous materials to Yellowknife for offsite disposal.
- Evaluation of contaminated soils at the site and within the soil storage location at the site.
- Evaluation of Metal Leaching / Acid Rock Drainage ("ML/ARD") of the Potentially Acid Generating ("PAG") rocks used at site for various infrastructure pads.
- Creation of a non-hazardous waste landfill facility ("Landfill").
- Depollution of select equipment destined for the Landfill.
- Placement of stockpiled non-hazardous waste with void filling using clean quarry sand and reuse (surface and subsurface) soils from the Soil Storage Area into the Landfill.
- Demolition of the Ulu camp shop.
- Burning of wood waste.
- Consolidation of the remaining waste into select areas at the Ulu camp.
- Analysis of soils used in infrastructure and pad construction for hydrocarbon contamination
- Identifying, prioritising and staging PAG rock on surface
- Replacing sections in Camp 3 Road and Culvert 6 with clean esker sands, these areas previously repaired by preceding owner with mineralised waste rock
- Ore pad PAG pullback and interim piling with cover (limestone/sand)
- Proof of concept in PAG rock management
- Cleaning up of a number of historical drill sites (2004) and cutting a number of diamond drill casings flush with the ground.
- Road and airstrip maintenance and repairs.

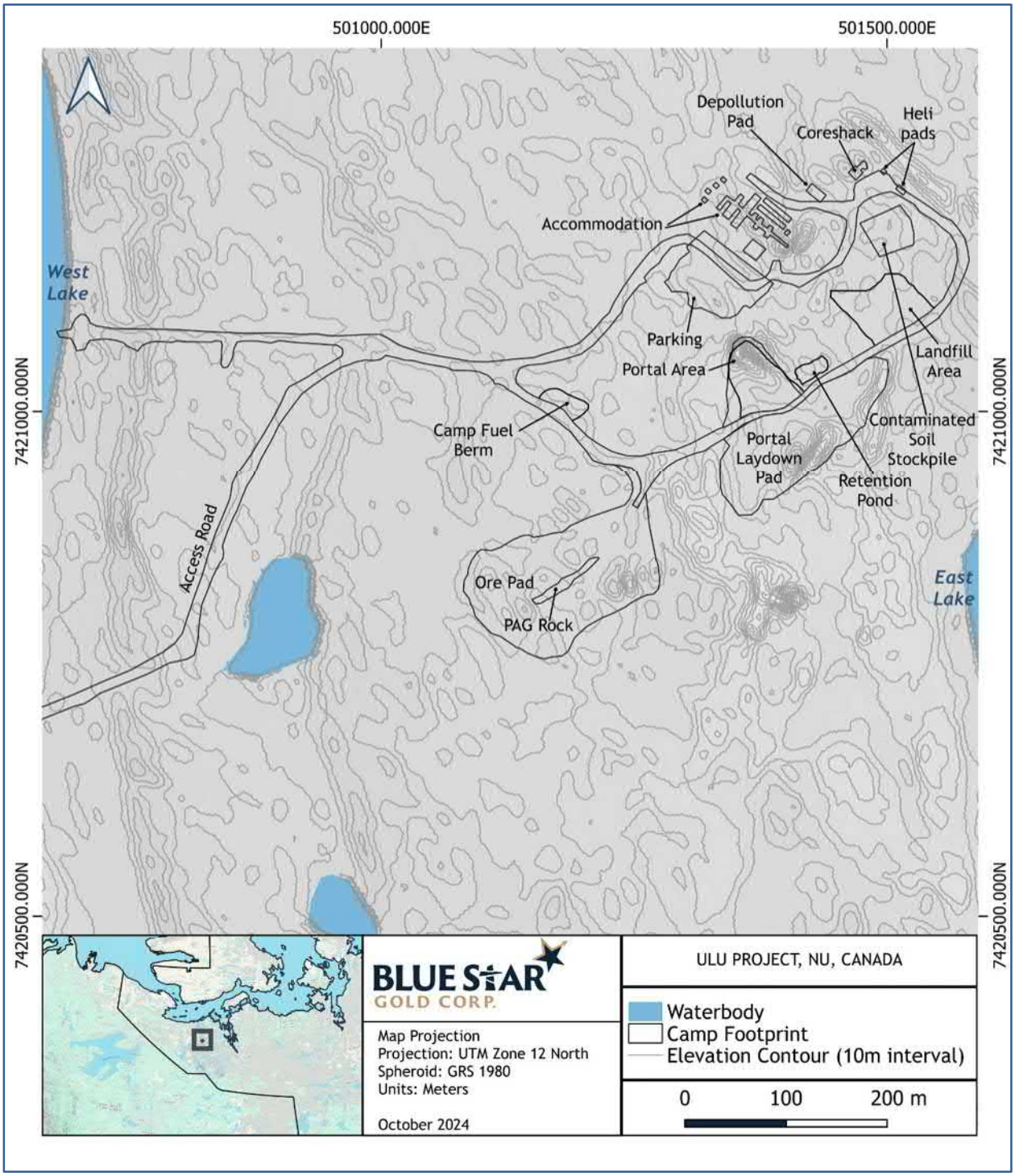


Figure 5. Ulu camp facilities as of year-end 2025.

3.0 EXISTING CONDITIONS

3.1 PHYSICAL AND CHEMICAL ENVIRONMENT

3.1.1 PHYSIOGRAPHY

The Ulu site is situated in the treeless arctic tundra where rock and glacial features dominate the landscape. The topography of the Ulu mining lease is characterized by deeply incised linear valleys bounded by steep bluffs, for about 85 m of relief. The basalt units form topographic plateaus, elevated above the sediments and granitic rocks. The typical landscape surface consists of 50-60% outcrops, north-trending lakes (accounting for less than 15%), and grassy swamps, boulder-strewn glacial drift and frost-heaved blocks (Cowley, 2015).

Regional drainage is easterly into Bathurst Inlet. Major rivers include the James River to the north and the Hood River which is located 8 km south–southeast of Ulu (Figure 6). Drainage in the vicinity of the Ulu mining lease is characterized by ponds of standing water without associated inlets or outlets. Locally, the property is located within the Rio Fido watershed which includes Penthouse Lake, located approximately 2.5 km southeast of Ulu and draining northeastward into Frayed Knots River, a tributary of the Hood River. The Hood River valley is incised more than 100 m below the surrounding upland plateau. The Hood River eventually flows into the Arctic Ocean near Bathurst Inlet (Cowley 2015).

3.1.2 SURFICIAL AND BEDROCK GEOLOGY

Quaternary surficial deposits include thin bouldery sandy-silty till veneers less than 2 m thick, thicker hummocky drift sheets likely composed of both subglacial and ablation tills which obscure bedrock, and areas of extensive glaciofluvial sediments such as eskers, esker complexes, deltas, and kames (Cowley 2015).

Permafrost 50 km north of the site (at the High Lake exploration project), calculated from temperature measurements in exploration drill holes, is approximately 440 metres deep (TBT Engineering, 2010). Thermistors installed underground at Ulu on the 75 m level indicated an average rock temperature of minus (-) 9.5 degree Celsius (°C) at that elevation (Tansey, 1997). Thermistors installed in esker cover and run-of- mine rock (waste rock) of the infrastructure pads indicate an average surface thaw depth of two meters in the unconsolidated materials (SRK, 2022).

The Project is located within the Slave Structural Province, an Archean granite-greenstone terrain. Rocks within the Slave Structural Province are assigned to the following three lithotectonic assemblages: an early assemblage of gneisses, granitic rocks and quartz arenites; greywackes, mudstones, volcanic rocks and syn-volcanic intrusions of the Yellowknife Supergroup; and a younger sedimentary-plutonic assemblage of clastic sediments and granitic rocks.

The Ulu deposit is an epigenetic lode-gold occurrence. It is located on the western margin of the High Lake Volcanic Belt, where Yellowknife Supergroup rocks are in contact with an Archean granitic batholith. On the property, the greenschist- to amphibolite-facies mafic volcanic and sedimentary rocks are folded into a 3 km long anticline (Figure). Gold-arsenic zones show a strong spatial association with the trace of this anticline. The Flood zone, the largest gold-rich zone, is localized in the west limb at the core of this fold. It generally dips steeply (70° to 80°) to the southwest. Mineralization is hosted in high-iron tholeiitic basalt sequence characterized by a lower amphibolite mineral assemblage of ferro-hornblende + plagioclase +

ilmenite with accessory quartz and epidote. Alteration minerals consist of biotite, chlorite, hornblende, actinolite-tremolite, and potassium feldspar (microcline) with minor calcite, epidote, tourmaline, and titanite. The highest gold values occur where brecciated clasts of basaltic wall rock are replaced by acicular arsenopyrite + quartz + K-feldspar (Flood *et al*., 2004).

3.1.3 GEOCHEMICAL CHARACTERIZATION OF BORROW, ORE AND WASTE ROCK

Borrow rock

SRK Consulting was involved in evaluating four potential sites for borrow rock (SRK, 2021) previously identified in SRK (2020). One of four sites was selected for additional study. The favourable site was considered to have low potential for metal leaching and not expected to generate ARD (SRK, 2021). To date, no borrow rock has been used including material from this identified favourable location.

Ore and Waste Rock

In 2019, prior to completing the Project acquisition, Blue Star retained qualified professionals to assess the geochemical characteristics of the ore and waste rock on surface at the Ulu camp and review past geochemistry assessments of the ore and waste rock to inform progressive reclamation planning. The assessment confirmed previous findings that the ore currently on surface may generate acidic drainage within a short timeframe and the rates of metal leaching are expected to increase under acidic conditions. Increased rates of metal leaching may be expected from the waste rock on surface under acidic conditions. Historical kinetic testing of crushed waste rock (0.2 to 3.0 mm in size) indicated that the onset of acidic conditions would be delayed for decades. Geochemical characterisation and assessment continued into 2021 using a qualified consulting professional with monitoring on-going since. More recent data suggest that the waste rock and ore rock currently on surface and not covered by esker sand has increased potential and accelerating rates of metal leaching and acid generation potential in some areas (SRK, 2023).

Numerous test pits have been excavated around the Ulu site now that the stored demolition and reclamation waste has been placed in the Landfill or removed from site; this has provided access to previously less accessible areas of infrastructure pad construction. Observations resulting from test pitting in 2021, 2022 and 2023 indicate that there are sections of waste rock within the infrastructure pads that are nearing the end of their ability to neutralise potential acid generation from the waste rock (SRK, 2024). In 2023 and in 2024 SRK has noted that all of the waste rock material excavated from the Ulu decline is potentially acid generating and through monitoring has identified a number of areas that are becoming high risk and termed them Priority 1 and Priority 2 areas (SRK, 2024). These are to be subject to interim storage on the ore pad and that the rock at Ulu needs to be managed through the development an implementation of an ML/ARD management plan (SRK,2025).

Esker Material

A historical geochemical assessment of the existing esker borrow pits has not been located within historical files. SRK was not involved in the analysis program design however was involved in evaluating the material for use in remediation activities. Three samples were collected from the currently used section of the quarry; five of six samples were considered non-PAG including the three from the active quarry with the one sample not expected to generate ARD and metal leaching potential considered to be low (SRK, 2021) collected from the old Camp 3 site.

3.1.4 SURFACE WATER

West Lake has been the licensed source of water since 1997, and East Lake received sewage treatment plant effluent prior to 2012. The drainage basins for East and West Lake were defined in 1996 by Echo Bay

with the drainage divide occurring through the ore pad. Surface runoff (including the majority of runoff from the ore storage pad, portal laydown area, and main camp area) flows predominately towards East Lake, which in turn drains into Ulu Lake (Gartner Lee, 2006). A small portion of surface runoff flows towards West Lake and almost all of this runoff is through material that was not covered with esker sand.

As presented in the Environmental Assessment for the Ulu Project (EBM, 1997) Reno Lake North, Reno Lake South, West Lake and Ulu Lake are oligotrophic, having soft water, and being highly sensitive to acidity. Concentrations of essential nutrients are low.

In 2004, preliminary baseline water quality studies were carried out in the Ulu area to build on the previous studies carried out at the Project (Gartner Lee, 2005). Study areas included Ulu, West and East Lakes as well as several creeks. Ulu Lake was considered to be a suitable reference site at the time. West Lake is similar in character to Ulu Lake, although has higher hardness, conductivity, and sulphate levels than that observed in other lakes in the area. East Lake is similar in water quality to the other lakes in the area yet contained a moderate level of nutrients, is moderately productive and meso-eutrophic.

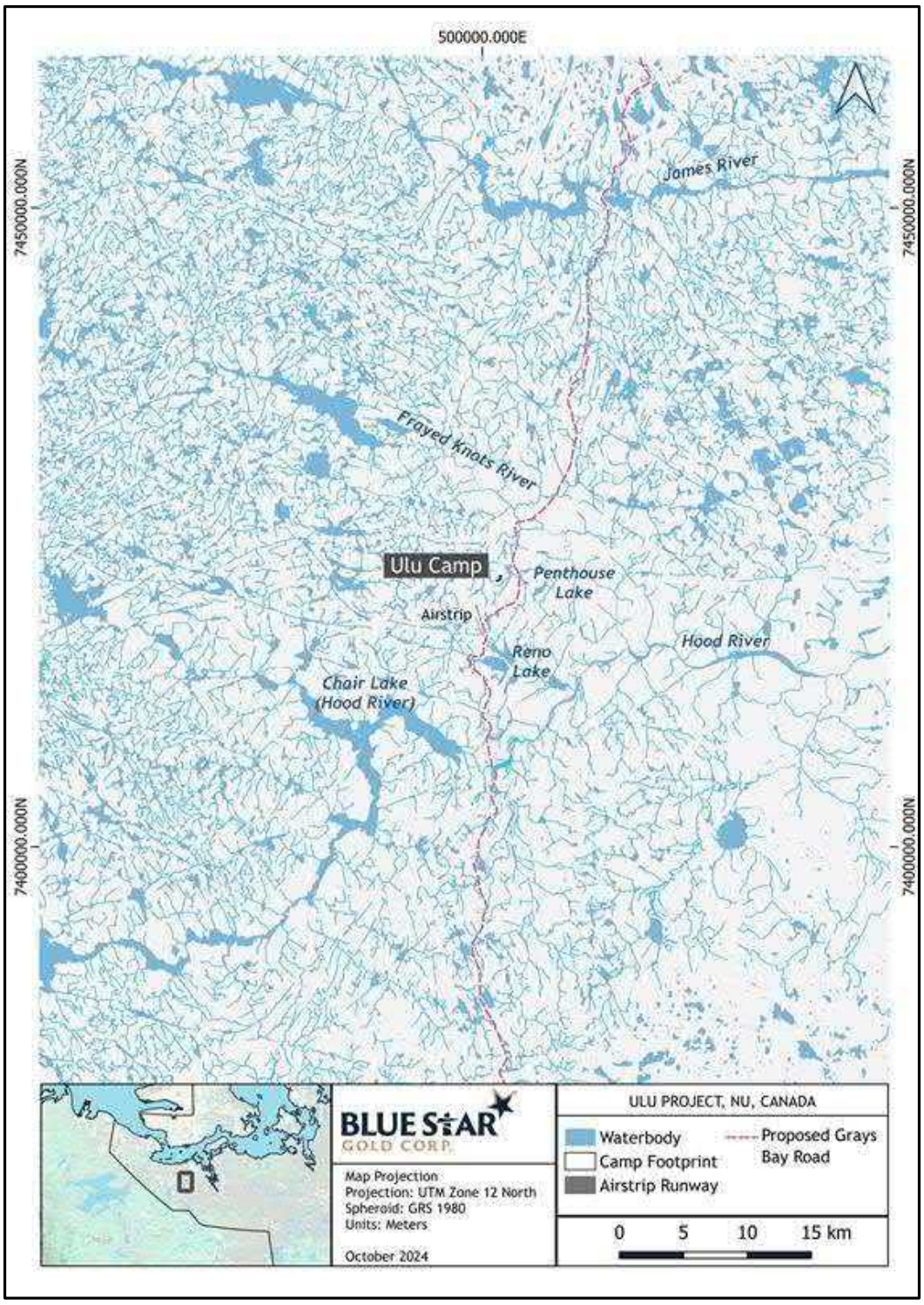


Figure 6. Ulu Gold Project regional physiography.

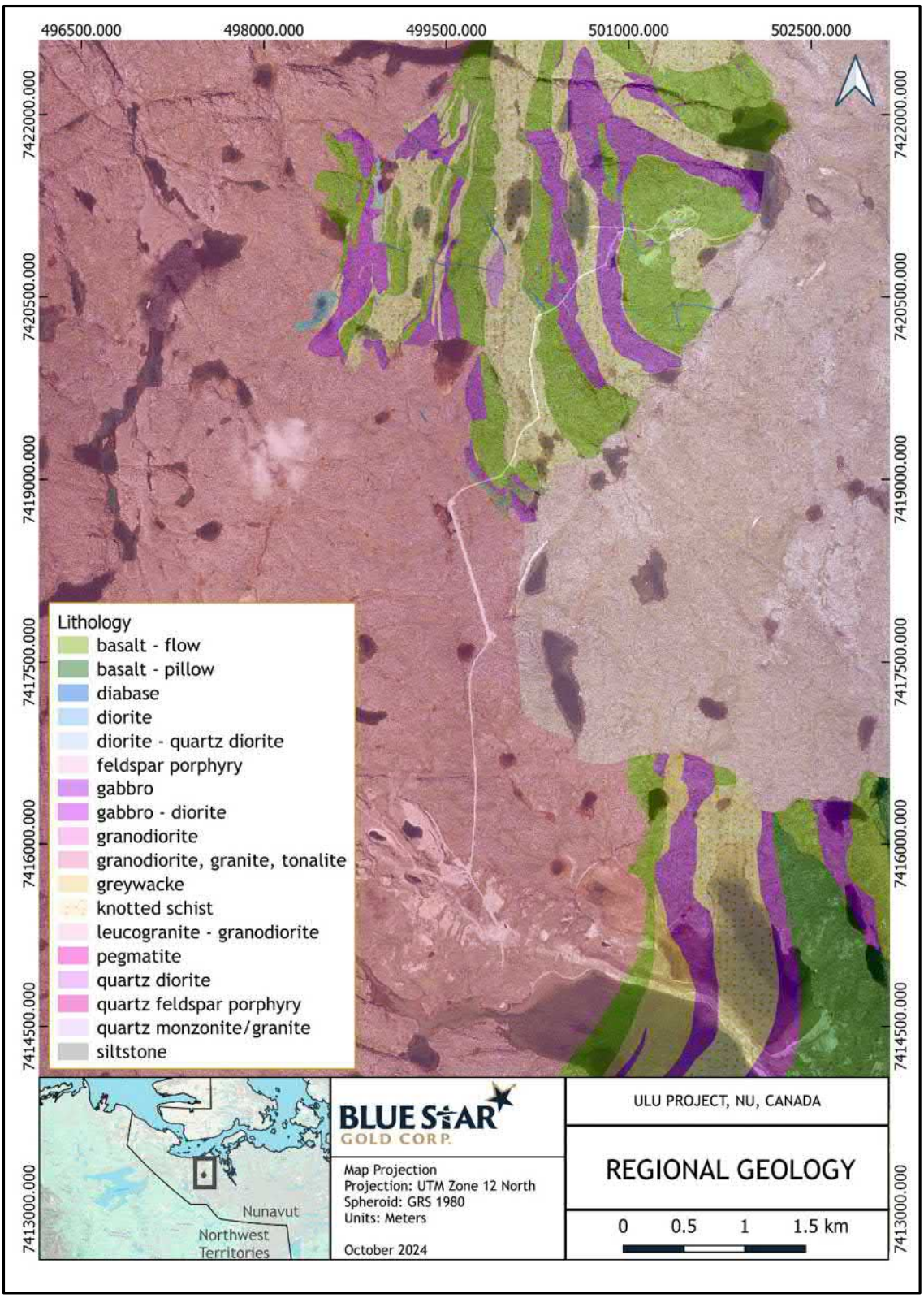


Figure 7. Ulu Gold Project regional geology.

3.1.5 CONTAMINATED SOIL

In 2019, under the supervision of the preceding owners, a qualified professional to conduct a site assessment to determine the volume and character of petroleum hydrocarbon ("PHC") impacts at the site. Blue Star has continued to evaluate potential volumes of the contaminated soils including additional sampling of existing storage piles and the camp infrastructure pad with sampling occurring in 2021, 2022 and 2024 (Figure 8) using qualified professionals to undertake this work (KBL 2021, KBL 2022, KEL 2024). Note in the Figure the samples in the very northeast were determined to be of biogenic origin (KEL 2024).

Original nomenclature of sampled areas translated to current nomenclature is presented in Table 4. Over time the aerated soils in the storage area are becoming reusable. The current assessment is included as Appendix B and the current consolidated estimated volumes of PHC contaminated soil to be managed is in Table 5. The 2024 sampling program included areas previously sampled and was expanded to include areas that were previously covered with demolition debris. Where possible, repeated sampling of the same sites is noted however as documented in 2020 (Stearman, 2020) the material placed in the old tank farm (Soil Storage Area) was split into piles and labelled TSP-##; sampling in 2021 became the baseline samples for these piles.

Table 4: Correlation of 2019 soil sampling to subsequent sampling

Original Area	Description	Current Area
Camp 3 Tank Farm	Soils moved to Soil Storage Area in 2019/2020	Not used
Camp 3 Stockpile	Soils moved to Soil Storage Area in 2019/2020	Not used
Main Tank Farm	Includes Main Tank Farm perimeter and drive-thru	**Soil Storage Area**
Day Tank Farm	Includes Day Tank Farm perimeter	**Day Tank Area**
Shop Floor	Includes shop perimeter	**Shop Area**
Parking Areas	All other areas sampled in 2019	**Parking Area 1**
		Parking Area 2
	Where debris was stored prior to landfill	**Upper Laydown Area**
	Adjacent to debris storage for landfill	**Tundra Area**
	Where debris was stored prior to landfill	**Lower Laydown Area**

3.1.6 CONTAMINATED ROCKS

In 2021, after the initial phase of landfilling was completed additional test pitting in areas that were covered with debris were excavated to determine the status of the rock pads. In two locations hydrocarbon contamination was noted within the coarse rock (pers.comm., D.Godley, 2021). In 2022 contaminated soil sampling programs were expanded to include the contaminated rock areas identified in 2021, sampling results indicated only very local contamination (KEL, 2023) however additional studies are required to delineate the extent of the issue and development a management strategy to treat this material.

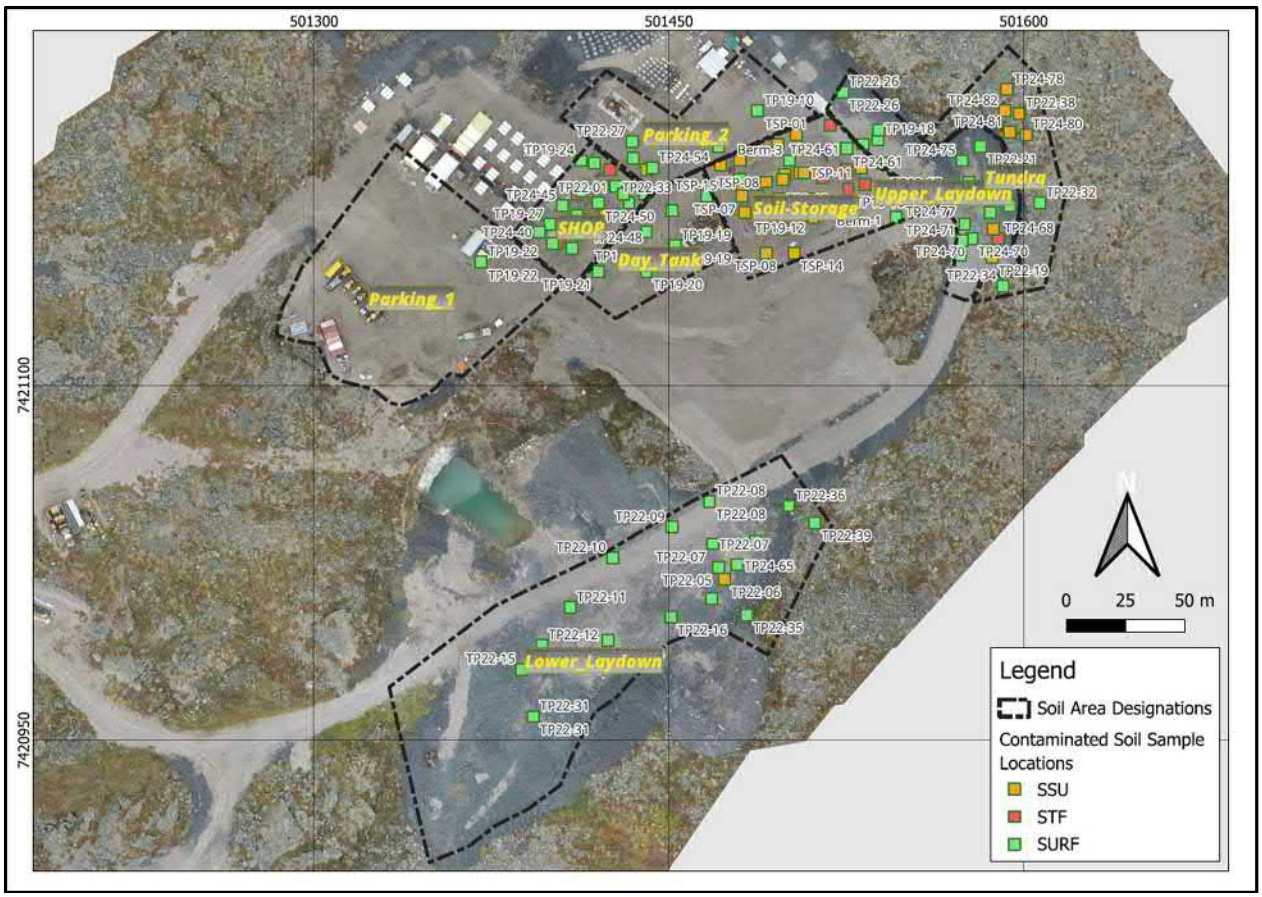


Figure 8: Current areas under study for PHC contamination; SSU = sub-surface reuse criteria met, STF = to be placed in STF, SURF = surface re-use criteria met.

Table 5. 2024 Consolidated petroleum hydrocarbon contaminated soil volume estimate (KEL, 2024).

Area	Soil to be treated (m^3)	Soil to be managed by burial (m^3)	Soil to be shipped offsite for treatment (m^3)
Soil Storage Area	354	0	0
Shop	426	138	10*
Day Tank	50	0[1]	10*
Parking 1	0	0[1]	0
Parking 2	100	0[1]	0
Upper Laydown	188[2]	0[2]	0
Lower Laydown	0[2]	0[2]	0
Tundra	0[3]	0[3]	0
SUM	**1018**	**138**	**20**

Notes:
* 2019 sampling not yet reproduced; volume based on (Stearman, 2020).
[1] Segregation of soil during excavation could adjust the volume of soil destined the soil treatment facility
[2] Segregation of materials during excavation could generate rock contaminated and soil contaminated fractions
[3] Biogenic

3.2 BIOLOGICAL ENVIRONMENT

3.2.1 VEGETATION AND WILDLIFE

The Project is located within the Southern Arctic Ecozone and the Takijuq Lake Upland Ecoregion. Much of this region is composed of unvegetated rock outcrops. Vegetative cover is characterized by shrub tundra, consisting of dwarf birch, willow, northern Labrador tea, avens species and blueberry species. Organic cryosols are the dominant soils in the lowlands and permafrost is deep and continuous (ECCC 2019).

Characteristic wildlife includes barren-ground caribou, muskoxen, grizzly bear, wolverine, Arctic hare, Arctic fox, red fox and wolf. Small mammals (e.g., Arctic ground squirrel, voles, and lemmings) are distributed throughout the region and provide an important food source for predators. Many species of migratory birds are present in the area during the summer season, including waterfowl, raptors, songbirds, and shorebirds, while some bird species are present year-round, e.g., ptarmigan, gyrfalcon, and common raven (ECCC 2019).

3.2.2 FISH AND FISH HABITAT

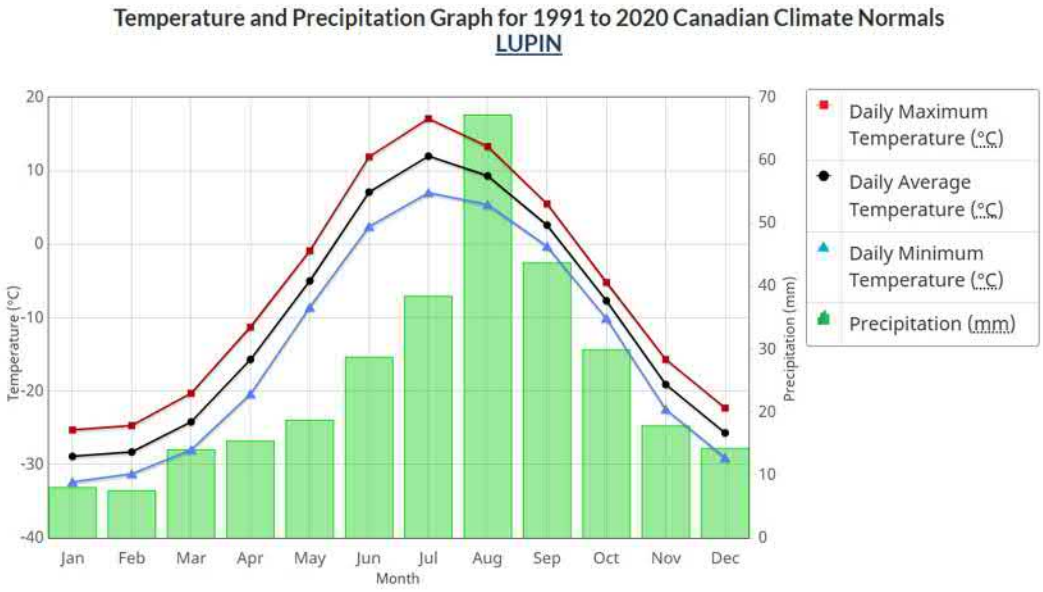
As presented in Gartner Lee Ltd. (2006), results of food web, fish, and fish habitat studies indicate that West Lake has a similar benthic community composition to that found in other lakes in the area, being one dominated by arthropods. Compared to other lakes in the area, West Lake was observed to have a higher plankton species richness, dominated by a diatom that is characteristic of a low-nutrient lake. Adult lake trout were sampled in West Lake and some sampled were found to be in spawning condition. West Lake provides rearing, spawning and nursery habitat.

3.3 ATMOSPHERIC ENVIRONMENT

Weather is typical of the continental barrenlands, which experience cool summers and extremely cold winters. Winter temperatures can reach -45°C and high winds can create extreme wind chill conditions and extensive drifting snow. Summer temperatures are generally in the range of 5° to 10°C. Based on regional normals from Lupin station between 1991 and 2020 (ECCC, 2023), average yearly rainfall in the region is 160 mm, mostly occurring during July and August, and average yearly snowfall is equivalent to 143 mm of water, most of which falls during autumn and spring. The average yearly temperature is -10.3°C. Monthly average precipitation and temperature normals are described in Figure 9 and Table .

The ground remains snow-covered for more than 250 days a year. Snow accumulation begins in September and remains into June. Annual snowfall falls during autumn and spring storms. Small lakes are clear of ice usually by the third week in June (though ice on the larger lakes can persist into the middle of July) and start freezing over again in mid to late September. Wind gust speeds have been recorded in excess of 100 km per hour (Cowley, 2015) however average 15 km per hour (ECCC, 2023).

Weather information was collected between June and mid-September between 1990 and 1992 by BHP from its portable weather station at Penthouse Lake. Data collected from Penthouse Lake is compared to data collected at Lupin and Kugluktuk during the same time period in Table . For the majority of the time, recorded wind speeds were in excess of 25 km per hour and generally were from the south (Cowley, 2015).



Source: https://bit.ly/3CMONyT

Figure 9. Temperature and precipitation normals.

3.4 SITE FACILITIES

3.4.1 BUILDINGS, OTHER STRUCTURES AND EQUIPMENT

Camp 3

A fuel tank farm (consisting of two 1,324,895 L and six 52,995 L tanks), explosives magazine, detonator magazine, garage, and the esker borrow pits were developed at Camp 3. The esker borrow pits were used

to build and maintain the road and airstrip and to establish the camp pad and portal pad at the Ulu exploration camp. The fuel tank farm was demolished in 2018, with all tanks subsequently cut and depolluted prior to the current ownership, with associated PHC contaminated soil transported to the Ulu camp for storage. The camp and garage have been demolished. Demolition waste was transported to Ulu camp for disposal.

In 2021 de-polluted demolition debris and non-hazardous debris was placed in the Landfill. Mobile equipment located at the Ulu camp was used to demolish, excavate contaminated soil, and transport the waste.

Ulu Camp

The acquired Weatherhaven residential complex has been modified to consist of 10 rooms, 18 sleeper tents, an office, a kitchen, and dry. Additional infrastructure at Ulu camp consists of a carpentry shop, vehicle parking, generators, core shack, core storage, ore storage pad, portal pad (waste rock pad), mine workings, mine sump (water retention pond), access roads, lined contaminated soil storage berm and fuel containment berms. The tanks in the historic bulk fuel tank farm (which had consisted of five 52,995 L tanks) and day tank farm were demolished in 2018, depolluted in 2020 and 2021 and placed in the landfill. The freshwater system, sewage treatment plant, and sewage line were decommissioned by the preceding owner. The truck shop was decommissioned and demolished in 2024 and placed in the landfill with some components backhauled for disposal.

The current residential complex including storage sea containers, fuel berms and active work buildings, carpentry shop and core shack, all remain as the on-going exploration camp.

A list of mobile equipment at Ulu camp and its current operational status is provided in Table . The majority of the decommissioned equipment has been depolluted, including a transformer, and placed in the landfill with remaining equipment staged for depollution in preparation for disposal as outlined in the referenced Table.

Table 6. Precipitation and temperature normals based on Lupin A records.

Parameter	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Year
Rainfall (mm)	0	0	0	0.6	4.8	25.1	38.1	65.4	25.7	0.9	0	0	160.5
Snowfall (mm)	8.0	7.9	14.0	14.9	13.8	3.7	0.3	1.9	17.9	29.0	17.8	14.2	143.3
Precipitation (mm)	8.0	7.9	14.0	15.4	18.7	28.7	38.4	67.2	43.7	29.9	17.8	14.2	303.5
Daily Average Temperature (°C)	-28.9	-28.3	-24.2	-15.7	-5.0	7.1	12.0	9.3	2.6	-7.7	-19.1	-25.7	-10.3
Daily Maximum Temperature (°C)	-25.3	-24.7	-20.3	-11.3	-0.9	11.9	17.1	13.3	5.5	-5.2	-15.7	-22.3	-6.5
Daily Minimum Temperature (°C)	-32.4	-31.3	-28.0	-20.4	-8.6	2.4	7.0	5.4	-0.3	-10.1	-22.5	-29.1	-14.0

Source: Compiled into text from ECCC 2023 https://bit.ly/3CMONyT

Table 7. Weather data comparison for the region – 1990-1992.

Parameter		Penthouse Lake	Lupin	Kugluktuk
JUNE	Mean Daily Temp.	5.8°C	4.7°C	3.8°C
	Max. Temp.	28.0°C	24.4°C	27.8°C
	Min. Temp.	-6.0°C	-13.9°C	-15.0°C
	Rainfall (mm)	0	24	14
JULY	Mean Daily Temp.	11.6°C	9.7° C	9.7°C
	Max. Temp.	30.0°C	27.2°C	32.2°C
	Min. Temp.	-2.0°C	-2.2°C	0.6°C
	Rainfall (mm)	18	36	25
AUG	Mean Daily Temp.	5.5°C	8.7°C	8.7°C
	Max. Temp.	22.0°C	24.4°C	29.4°C
	Min. Temp.	-4.0°C	-3.2°C	-3.3°C
	Rainfall (mm)	23	41	38
SEPT	Mean Daily Temp.	1.4°C	2.0°C	2.5°C
	Max. Temp.	15.0°C	16.7°C	26.1°C
	Min. Temp.	-7.0°C	-11.9°C	-20.0°C

Source: Cowley 2015

Table 8. List of Existing Equipment.

UNIT NUMBER	Year	Model	MAKE	DESCRIPTION	UP	DOWN	Ops Necessessity	Disposal Method
PK-01	1991	956	CATERPILLAR	Smooth Drum Roller	x		X	backhaul road
EX-01	1994	311	CATERPILLAR	*excavator (small)*	x		X	backhaul road
DZ-01	1989	D8N	CATERPILLAR	*Dozer (medium)*	x			backhaul road
GR-01	1980	14G	CATERPILLAR	*Grader (medium)*	x			backhaul road
HT-01	1984	769C	CATERPILLAR	*Haul truck (medium)*	x		X	backhaul road
HT-02	1984	769C	CATERPILLAR	*Haul truck (medium)*		X		backhaul road
LD-01	1981	966D	CATERPILLAR	*Loader (medium)*		X		backhaul road
LD-02	1984	988B	CATERPILLAR	*Loader (large)*		X		backhaul road
PU-05	1995	CAB	KUBUTO	*passenger carrier*	X			backhaul via air
WELD-01	2005	400D	LINCOLN	*Welder (stick)*	X		X	backhaul via air
COMP-01	1995	HQ375	Le ROI	*Air compressor 100 cfm*	X		X	backhaul via air
GEN-01	2018	4TNV98	YANMAR	*3 phase main gen*	X		X	backhaul via air
GEN-02	2014	XQ20	CATERPILLAR	*1/3 phase backup*	X		X	backhaul via air
GEN-06		DK	WALLENSTEIN	*7300e diesel*	X			backhaul via air
TRI-01	1991	357	PETERBUILT	*Tri axle*	X		X	backhaul road
TRI-02	1989	13 speeds	VOLVO	*Volvo water truck*		X		backhaul road
TRI-03	1978	Foremost	FOREMOST	*Commander*	X			backhaul road
LOW-01	1988	40ft	NORTH CANADIAN	*flatbed 40ft (43,180kgs)*	X			backhaul road
BUS-01	1989	D600	FORD	*20 Passenger*	X			backhaul road
EX-02	2013	85D	John Deere	*excavator (small)*	X		X	backhaul road
TH-01	2008	520-50	JCB	*Telehandler*	X		X	backhaul road
Clam -01	2009		Decap	*Clam dump trailer*	X		X	backhaul road
skid-01	2012	SR200	Case	*Skidsteer*	X		X	backhaul via air
SXS-01	2023	RTV-520R-A	Kubota	*Side By Side*	X		X	backhaul via air
SXS-02	2023	RTV-X1140	Kubota	*Side By Side*	X		X	backhaul via air
GEN-03	2012	XQ30	CATERPILLAR	*30Kw*	X			backhaul via air

Note: Disposal method subject to change.

3.4.2 MINE WORKINGS

In 1996, a 632 m long 5.2 m wide by 4.9 m high -15% ramp was developed to the 75 m level to access the Flood Zone. In 1997, the ramp was extended to the 155 m level, an escape way/fresh air vent raise and seven cross-cuts were excavated (Figure 10). The portal was closed to prevent access and the vent raise was backfilled both by the preceding owner.

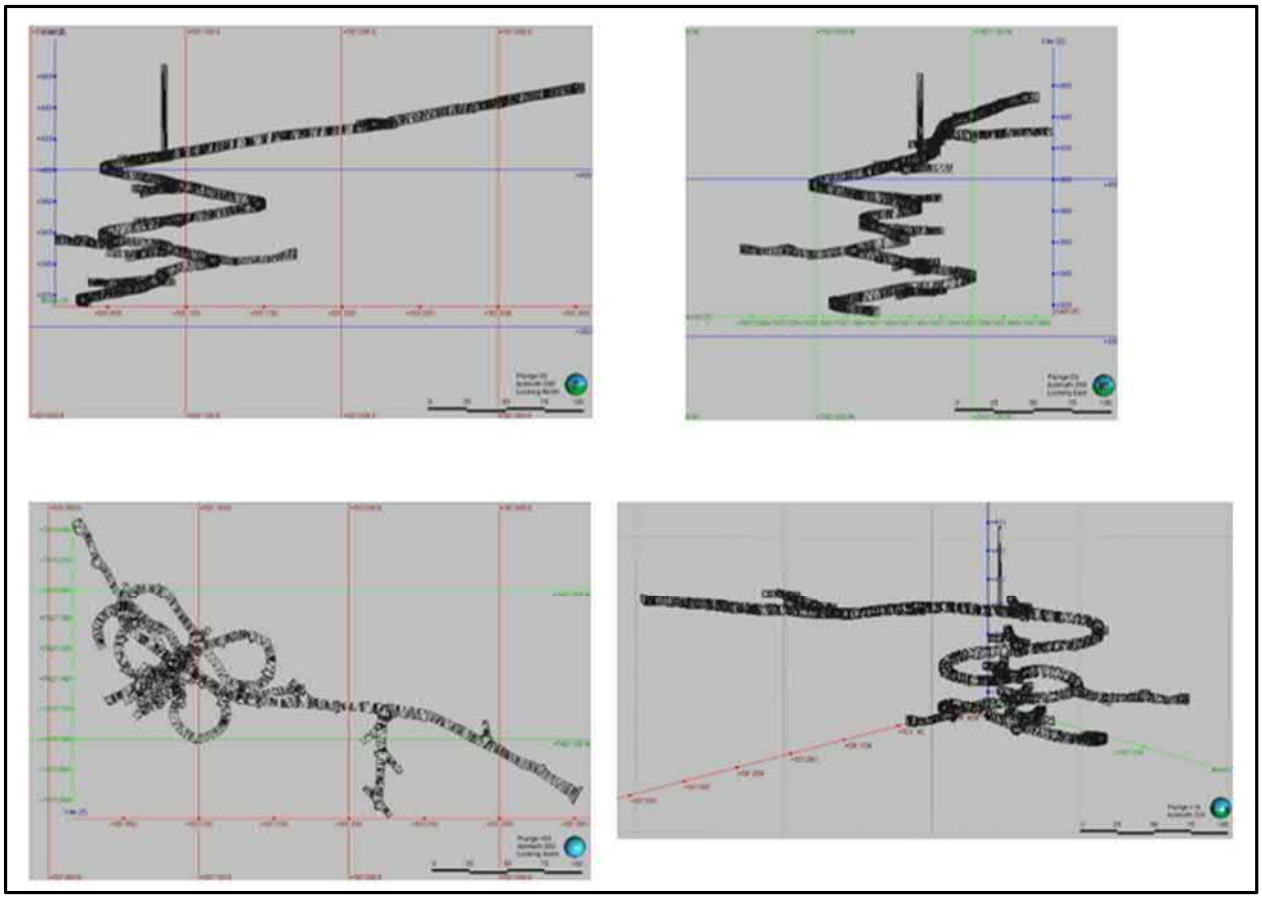


Figure 10. Underground development.

3.4.3 MINE SUMP

The Mine Sump, also referred to as the water retention pond, was established adjacent to the mine portal. Its purpose was to provide containment for the settling and sediment retention of water pumped from the mine decline ramp and the mine portal entrance. The 30 × 50 m sump was built above ground and is lined with a geomembrane; portions of the berm were constructed using mineralized rock. This sump was used periodically during camp operations for containment of sewage treatment plant effluent.

In 2019 a mixture of ore material and waste material was moved from the ore pad to a location up slope of the Mine Sump. In 2020 the ore/waste material was partially deposited into the Mine Sump with the remainder spread level above the Mine Sump.

During the exploration seasons 2021, 2022 cuttings from the core saws were deposited in the Mine Sump. During the 2023 exploration season some drill core that was previously stored cross piled near the upper

camp road and was found to be unrecoverable due to lack of labels and meterage markers and was placed into the Mine Sump.

The addition of rock material into the Mine Sump has potentially jeopardized the integrity of the sump liner with a suspected tear in the linear high on the south wall.

3.4.4 ORE AND WASTE ROCK PADS

Approximately 2,227 tonnes of ore were stockpiled at the ore pad from the 1996/1997 underground program (Tansey 1997); a resulting 750 kg bulk sample was recovered in 1996 for metallurgical test work at Lupin. The preceding owner reported that 1,738 m^3 (3,358 tonnes assuming a specific gravity of 1.93 tonnes per m^3) of ore was relocated to a stockpile between the portal and the mine sump in 2019. The discrepancy in ore volume between the previous reports is noted, Blue Star assumes the greater value for the progressive reclamation work planning.

Approximately 126,900 tonnes of waste rock were extracted from the underground workings (BGC *et al* 2005). The waste rock was used to construct the ore pad, and to expand the camp pad and portal pad; it is estimated that approximately 5,000 m^3 of waste rock is stockpiled on the portal pad. The pads were mostly capped with a thin layer of esker material to provide a base for infrastructure construction and material laydown. Development waste rock was also backhauled to Camp 3 area for use as riprap. The location and volume of waste rock at Camp 3 is unknown although numerous locations of waste rock are notable along the road.

In 2020 the ore/waste material was partially deposited into the Mine Sump with the remainder spread flat above the Mine Sump.

3.4.5 ROADS AND AIRSTRIP

A network of roads (14 km), constructed from material sourced from the esker borrow pit and locally armored using waste rock, connect the Ulu camp and portal area with the airstrip (1,300 m long) and Camp 3 as shown on Figure 3. Culverts were installed in the road to provide unrestricted flow to the drainage courses during spring melt and precipitation events. Silt fences were placed below the culverts by the preceding owner to provide sediment control. Silts fences are re-established on an annual basis as needed.

Road repairs were documented by the preceding owner however the type of rock used for the repairs was not. In 2021 Blue Star replaced two sections of road, one section on the Camp 3 road, and the other at Culvert 6. It appeared that mineralised waste rock may have been used in prior repairs which increased the risk of acid generation in areas of contact water. The road sections were replaced with clean esker material from the quarry. Silt fences were placed to provide sediment control.

3.4.6 ESKER BORROW PIT

The esker borrow pit (quarry) used for the road, airstrip, and final grade on the camp pad is located near Camp 3 at Reno lakes. This material has also been used as void filling and interim and proposed final cover of the non-hazardous waste landfill and will be used for interim cover of PAG rock.

3.4.1 NON-HAZARDOUS MATERIAL LANDFILL

An approved non-hazardous waste landfill was established in 2021. Non-hazardous waste materials from previous operators were dismantled, cut, crushed, depolluted, or otherwise prepared and placed in the approved area. Voids in the material and between placements were filled with clean esker sands from the esker borrow pit (SRK, 2022b). Subsequently, in 2024 and 2025 a small volume of additional non-hazardous waste from previous operators was depolluted and placed in the landfill and is documented in a draft of the Ulu Landfill Construction Report (SRK, 2022b, Appendix C).

3.4.2 WASTE, CHEMICAL AND SEWAGE STORAGE AREAS

The preceding owner demolished unused facilities and stockpiled them in preparation for disposal at the portal entrance, as illustrated in Figure 4. Blue Star has licenced and created a non-hazardous waste landfill that does not compromise the underground workings, as outlined in the *Landfill Management Plan*. The preceding owner backhauled oil/waste oil and hazardous waste offsite. The existing inventory of fuel and waste oil at the time of acquisition included 16 totes and 217 205-litre drums, based on the number of totes and drums observed on site by Blue Star in July 2019. The volume of hazardous waste is estimated to be 70 m^3, assuming the totes and drums are full. The volume does not include the waste oil/fuel that is expected to be drained when decommissioning equipment. These wastes were backhauled as part of the 2020 and 2021 work programs. All wastes generated during exploration activities are managed and backhauled according to the Project authorisations.

The preceding owner excavated the PHC contaminated soil at the Camp 3 fuel tank farm following the demolition of the facility. Approximately 1,220 m^3 of PHC impacted soil was transported to the Ulu Camp tank farm and stockpiled into the area that had previously held the fuel tanks, the current Soil Storage Area. This material was subsequently split into piles (Stearman, 2020) and that material that met surface and sub surface re-use criteria was used as void fill in the 2024 landfill placement.

4.0 RECLAMATION PLANNING

4.1 APPROACH TO PLANNING

The ICRP further develops the measures and methods previously approved in the preceding interim closure plan iterations for the Project. Since early 2019, Blue Star has undertaken, and continues to undertake, work with the landowner, the Kitikmeot Inuit Association ("KIA"), to understand the KIA's interests regarding land use in the Ulu area. The aim is to scope and refine the proposed progressive reclamation measures, allowing for the continued use of the Ulu site for exploration-related activities while preserving the site's future mining potential. In support of developing a mutual understanding of the site and a path forward on planned site activities, a coordinated site visit was undertaken in 2019 prior to commencing the water licence assignment process, and collaboration among the KIA's and Blue Star's technical advisors is ongoing, which includes the development, regular reviews and revisions of this Plan.

4.2 ROLES AND RESPONSIBILITIES

Blue Star is responsible for activities associated with the Project, including implementation and management of this Plan. Blue Star's contact information is provided below.

Blue Star Gold Corp.

Suite 507-700 W. Pender Street
Vancouver BC V6C 1G8
Phone: 1 778-379-1433

Contact: Darren Lindsay, Vice President of Exploration
Phone: 1 778-379-1433
Email: d.lindsay@bluestargold.ca

4.2.1 STAFF, CONTRACTORS, SUPPLIERS AND VISITORS

All personnel conducting activities on site, including staff, contractors, suppliers and visitors, are required to be guided by this Plan as it pertains to their activities on site. Specifically, these responsibilities include:

- Taking all necessary steps to minimize negative effects to water, land and air;
- Cooperating fully with your supervisor and/or Blue Star management to implement an environmental protection program in your work area;
- Only carrying out duties and tasks that you are experienced at and trained to perform;
- Where there is uncertainty, asking questions and bringing concerns to the attention of your supervisor when working with products or conducting tasks that may pose potential environmental risks;
- Reporting wildlife observations, spills and emergency situations in accordance with relevant management plans.

4.2.2 MANAGERS AND SUPERVISORS

Managers and supervisors have a responsibility to ensure that staff, contractors, consultants and visitors have been trained in Blue Star procedures. Additional supervisor and manager responsibilities include:

- Maintaining a no blame work environment in implementing mitigation measures and follow-up actions;
- Ensuring site-, task- and material-specific training is provided to all departments and staff;
- Ensuring there are appropriate and sufficient supplies on site to support implementing mitigation measures and follow-up actions;
- Providing assistance in responding to environmental hazards;
- Maintaining records regarding inspections, personnel training, equipment testing and maintenance and decommissioning;
- Ensuring compliance reporting is undertaken in a timely manner; and
- Engaging with relevant parties in a timely and transparent manner, where appropriate.

4.2.3 RECLAMATION MANAGER

In addition to the responsibilities listed above the Reclamation Manager is responsible for:

- Overseeing soil and waste handling, transport, sampling, and management;
- Day-to-day oversight of all related reclamation efforts;
- Coordinating with other managers and supervisors to ensure safe and appropriate allocation of resources on site; and
- Maintaining the reclamation schedule, and where schedule changes occur, advising the Project Manager in a timely manner.

4.2.4 DRILL CONTRACTORS

Drill contractors are responsible for ensuring each drill site is cleaned up to the satisfaction of a Blue Star inspector following each drill move and prior to commencing drilling at a new drill target. Closure-related activities to be undertaken include:

- Removing all drill timbers, hoses, equipment, debris and garbage from the drill site;
- Cut drill stems and anchors flush with the ground surface;
- Cap or plug drill holes;
- Backfill flush with the ground surface any areas that may have eroded or subsided around the drill stem;
- Remove to a sump any drill cuttings that may have been spilled to the surrounding land;
- Ensure cuttings sump is stable;
- Implement erosion control measures where necessary.

4.3 STATUS OF PLANNING

4.3.1 PAST CLOSURE PLANNING

Blue Star has reviewed the previous closure and reclamation (previously referred to as abandonment and restoration) plans filed with the Nunavut Water Board (NWB) and the historical water licences associated with the property. Blue Star notes that the content of the plans has changed little since 2001. Several studies were undertaken in support of the environmental assessment of the Project (Nunavut Impact Review Board file # 99WR055) and of the development of the initial interim closure plan submitted to the NWB; these include, but are not limited to, the following documents:

- Ulu Project: Preliminary Assessment of Acid Rock Drainage Potential, Klohn-Crippen Consultants Ltd., October 1996.
- Fisheries Assessment of Streams and Lakes in the Ulu Project Area, RL&L Environmental Services Ltd., November 1996.
- Notes on Wildlife in the Vicinity of the Echo Bay Mines Ulu Project and Associated Transportation Corridor, Hubert and Associates and Canamera Geological Ltd., August 1996.
- Wildlife and Wildlife Habitat Assessment, Canamera Geological Ltd., Environmental Resources Division, November 1996.
- Ulu Mine Project Archaeological Impact Assessment: Phase I, Quaternary Consultants Ltd., July 1996.
- Ulu Mine Project Archaeological Impact Assessment: Phase II, Quaternary Consultants Ltd., September 1996.
- Land-Cover and Vegetation of the Ulu Site and Ulu/Lupin Winter Road, Nunavut, Canada, Institute for Advanced Field Education Ltd., January 1998.
- Kinetic Testing of Sulfide-Rich Material from Ulu, Klohn-Crippen Consultants Ltd., April 1998.
- Baseline Aquatic Studies Program in the Ulu Project Area, Nunavut, RL&L Environmental Services Ltd., May 1998.

The following studies were undertaken by Wolfden in anticipation of resuming underground activities at the site:

- Hydrological Assessment of West Lake, Gartner Lee Limited, May 2006.
- Preliminary Baseline Water Quality Assessment – Ulu, Gartner Lee Limited, February 2005.
- Review of Field Column Kinetic Test Data, Mehling Environmental Management Inc., December 2004.

4.3.2 CURRENT CLOSURE PLANNING

It is understood that a body of work, which includes baseline environmental studies, was undertaken at Ulu from 2004 to 2006; however, this information was not available for informing this Plan. Blue Star is in the process of obtaining access to those data.

Closure, abandonment, and restoration of a mine is the final stage in the life cycle of a viable mining operation and the decision for final closure comes after careful consideration of all other options available.

Closure planning for mining projects is best understood as a continuum that evolves from a basic conceptual level during pre-production stages towards detailed designs as facilities are completed and as-built details are available for consideration in closure designs. The level of closure planning detail and the timelines to complete closure activities vary with the development of the different components of the site.

In the late 1990s, the Project was in an advanced stage of exploration, given its ability to provide mill feed to the Lupin Mine. Since the Lupin Mine owners sold their interest in the Project in 2003, the Project has transitioned from exploration to near feasibility and back to exploration again as discussed in Section 2.2. Until 2017, reclamation and closure planning did not advance to recognize the change in the status of the site.

This ICRP revision considers the *Interim Closure and Reclamation Plan* for the Ulu Exploration Project (Bonito, 2013 [NWB approved], 2016 [not approved]) and the *Ulu Project – Progressive Reclamation Workplan* (Bonito, 2018 [not approved]) prepared by the previous site operators and the *Interim Closure and Reclamation Plan – Ulu Gold Project*, 2020 [NWB approved] and the *revised Interim Closure and Reclamation Plan – Ulu Gold Project*, 2021 [not approved]. This revised version of the ICRP presents Blue Star's progressive activities undertaken since the last approved ICRP and its approach to progressive reclamation required to return the Project to a scale appropriate for exploration activities which has been developed through discussions with the KIA. Activities listed in Section 2.4 are assumed to be completed; their status have been confirmed by Blue Star to the best of its ability.

4.4 COMMUNITY ENGAGEMENT SUMMARY

Blue Star has undertaken a number of engagements since early 2019 on matters relating to both specific aspects of its operation in Nunavut as well as general aspects relating to its current and future planned activities in the region, including reclamation and exploration at the Ulu site.

Through the property acquisition process and the related licence assignment processes, Blue Star worked closely with the KIA and the Government of Canada to develop a mutual understanding of the current conditions at Ulu and Blue Star's near-term plans for the site. As the acquisition of the Project did not conclude until January 2020, Blue Star was unable to formally engage with the public on specific aspects of Ulu interim closure planning until after this time. Since the acquisition of Project, Blue Star has met with the KIA in person several times and has dialogued with stakeholders over email and by phone. Public meetings planned for Kugluktuk and Cambridge Bay in 2020 were postponed in response to a pandemic however were undertaken in mid-March 2023. The Company endeavours to have at least annual meetings in Kugluktuk and Cambridge Bay.

In addition to participation in the public processes administered by the Nunavut Planning Commission, the Nunavut Impact Review Board (NIRB) and the NWB, Blue Star commits to upholding its *Engagement Plan*.

4.5 ALTERNATIVES ASSESSMENT

In the process of planning the progressive reclamation strategies for the Project and during this revision of the plan, several tools, techniques, and methodologies were utilized with the following goals:

- Examine possible alternatives to reclaim project components.
- Determine which alternatives are best suited to the site, the desired near-team closure objectives, future long-term closure objectives, and end land use.

This included the following assessments:

- Landfill needs and location options.
- Management options for PHC contaminated soil and rock.
- Management options for potentially acid generating rock.
- Analysis of various liner systems for the soil treatment facility.
- Analysis of various cover material options for PAG rock.
- Planning for future rock quarry development.

4.6 RECLAMATION RESEARCH

Reclamation research will be an ongoing component of Blue Star's closure planning process and will focus primarily on the key closure measures proposed for the site, both in the near term and long term. This research will include the following topics:

- Material suitability for landfill erosion covers.
- Material suitability for PAG/AG rock management barrier covers.
- Rock quarry assessments.
- Ore and waste rock management.

5.0 OBJECTIVES & DESIGN CRITERIA

5.1 OBJECTIVES

Closure principles guide the selection of closure objectives. Four core closure principles are applicable to advanced mineral exploration and mine sites: physical stability, chemical stability, no long-term active care requirements, and future use (including aesthetics and values) ensuring future generations of Inuit will be able to enjoy the land as Inuit do today (MWLWB/AANDC 2013; NTI 2008).

Blue Star considers the overarching objectives of NTI's *Reclamation Policy* (2008) applicable in this context which include:

- Establishing goals for the reclamation of Inuit Owned Lands (IOL) and setting out the obligations of the land user.
- Minimizing the environmental liability to Inuit from the use of IOL.
- Ensuring that reclamation requirements are incorporated in a reclamation plan.
- Integrating Inuit Qaujimajatuqangit and consultation with Inuit into the reclamation process.
- Maximizing the benefits of reclamation to Inuit.

5.1.1 PROGRESSIVE RECLAMATION GOAL AND OBJECTIVES

Blue Star wishes to continue exploration and undertake progressive reclamation to return the site to a condition reflective of the currently intended level of exploration activity, yet supportive of potential future mine development. In consideration of the closure principles of advanced mineral exploration sites, the near-term closure and reclamation objectives are the following:

- Stabilize the site through progressive reclamation and ensure environmental protection to the extent necessary to minimize liability to Inuit, and yet support the continued use as an exploration site allowing for future development of a mine and mine-related infrastructure and benefit to Inuit.
- Ensure that there is no danger to the health or safety of people and wildlife.

5.1.2 TEMPORARY CLOSURE GOAL AND OBJECTIVES

Temporary closure, or a planned shutdown, is considered a short-term event and the result of seasonal, economic, or regulatory requirements. The Project is expected to temporarily close seasonally, between periods of exploration and progressive reclamation activities. The goal for temporary closure is to maintain the site for future exploration and progressive reclamation activities. The objectives for temporary closure are to ensure that:

- No danger to the health or safety of people and wildlife is posed over the reasonably foreseen closure period.
- Degradation of the site facilities is minimized.
- Monitoring required under the various authorizations may be undertaken to enable implementation of adaptive management measures and fulfillment of compliance obligations.

5.1.3 PERMANENT CLOSURE AND RECLAMATION GOAL AND OBJECTIVES

Permanent closure and reclamation of the site occur at the end of mine life, when economic ore reserves have been exhausted or a decision has been made to place the mine on care and maintenance or a decision as been made to abandon the site. Objectives of permanent closure are the following:

- Ensure that no danger is posed to the health or safety of people and wildlife.
- Ensure the requirements for long-term maintenance and monitoring associated with all of the site facilities are minimized.
- Ensure contaminant loadings to the environment from the closed facilities are minimized or prevented.
- Ensure the site and affected areas are returned to a condition that is compatible with the surrounding original undisturbed area with respect to its future potential/productivity uses.

5.1.4 ADAPTIVE MANAGEMENT

Adaptive management is an approach to environmental management that, according to the NIRB's *Technical Guide Series, Terminology and Definitions* (2018), is a systematic and ongoing decision-making process that, when uncertainty exists, aims to reduce that uncertainty over time and is well suited to mine closure planning, given the long-term planning horizon and associated uncertainty. Adaptive management is precautionary in nature and allows for contribution of improved science to the development of robust mitigation measures. A key characteristic of adaptive management is monitoring, which is used to advance scientific understanding and to adjust management policies in an iterative process. Embedding adaptation into closure planning involves thinking about how the results of monitoring will change planned management actions.

Adaptive management planning identifies actions needed when a predetermined threshold is met or triggered, and allows for performance monitoring and project re-evaluation in the future. Risk triggers provide progressive decision points that identify how and when management action should be taken. At a high level, adaptive management may include the following steps:

- Identifying risk triggers associated with vulnerabilities or uncertainties.
- Quantifying impacts and uncertainties.
- Evaluating strategies and define an implementation path that allows for multiple options at specific triggers.
- Monitoring the performance and critical variables in the system.
- Implementing or re-evaluate strategies when triggers are reached.

5.2 DESIGN CRITERIA

Design criteria are presented in design documents appended to the respective facility management plans. The information in this section is provided for summary purposes only, the design documents stand alone and take precedence. No updates to design diagrams submitted as part of the *Interim Closure and Reclamation Plan – Ulu Gold Project*, 2020 [NWB approved].

5.2.1 LANDFILL COVER DESIGN

Design criteria for final cover on the non-hazardous waste onsite landfill (the Landfill) include but are not limited to the following parameters:

- Maximum side slopes of 4H:1V.
- PHC concentrations of material placed within the Landfill shall not exceed the CCME 2008 guidelines (Table 8).
- Minimized surface run-off through the area during operations and post-closure.
- Drainage gradient of the Landfill's outer surfaces post-closure shall not be less than 1%.

5.2.2 SOIL TREATMENT FACILITY

The design criteria for the soil treatment facility (STF) includes, but is not limited to, the following features:

- Average height of soil undergoing active treatment will be no greater than 1.5 m.
- Floor of each cell will be sloped at a minimum slope of 1% towards a sump.
- Each cell will be accessed via access ramps sloped at 5H:1V.
- Each cell shall be lined with a low permeability liner with a hydraulic conductivity of less than 1x10-7 cm/s.
- Minimum 0.5 m freeboard, based on the capacity to store a 24-hour 10-year frequency storm event and on the average annual snow accumulation using a 10:1 ratio.
- Berms will have a minimum height of 1.5 m.
- Inner berm slopes of 2H:1V and outer berm slopes of 1.5H:1V.
- Located greater than 500 m from sensitive areas.
- Located on a site with slope less than 5%.
- Groundwater table must be greater than 1 m from the base of the facility.

5.2.3 PETROLEUM HYDROCARBON CONTAMINATED SOIL REMEDIATION

The soil quality remediation objectives for PHC fractions F1 to F4 (Table 9) are based on the Government of Nunavut's *Environmental Guideline for Contaminated Site Remediation* (2009) Tier 2 guidelines for:

- Wildland land use.
- Relevant exposure pathways.
- Coarse-grained soils. Selection of the remediation objectives based on future land use and the exposure pathways present at the site is described in the 2024 contaminated soil investigation report (Appendix B).

5.2.4 POTENTIAL ACID GENERATING AND ACID GENERATING ROCK MANAGEMENT

There is not yet a design document for managing these rocks. Blue Star has noted that most of the waste rock used has the potential to become acid generating and has been undertaking research to determine best management paths for this material. The Company's consultants are in the process of refining options to manage the rock and draft a management plan for this rock including design criteria for any facility required to deal with this material. Once prepared the management plan will be appended to this ICRP.

Table 9. Soil quality remediation objectives for petroleum hydrocarbons.

Objectives for Coarse-Grained Soils	F1 mg/kg	F2 mg/kg	F3 mg/kg	F4 mg/kg
Surface (0 to 1.5 m depth)	210	150	300	2,800
Subsoil (>1.5 m depth)	700	1,000	2,500	10,000

Source: CCME 2008
Note: "Coarse" means coarse-textured soil having a median grain size of >75 µm

6.0 PROGRESSIVE RECLAMATION MEASURES

6.1 DEFINITION OF PROGRESSIVE RECLAMATION

Progressive reclamation takes place prior to permanent closure, and is the reclamation of components and/or decommissioning of those facilities that no longer serve a purpose. These activities can be completed concurrently with exploration activities at the site, utilizing available resources to reduce future liability, minimize the duration of environmental exposure, and enhance environmental protection. Progressive reclamation may shorten the time for achieving the future final closure objectives and may provide valuable experience on the effectiveness of certain measures that may be implemented during permanent closure.

6.2 OPPORTUNITIES FOR PROGRESSIVE RECLAMATION

Blue Star's approach to progressive reclamation is to utilize the operable equipment available at site to dispose of non-useable equipment and materials in the Landfill and to manage PHC contaminated soil in the STF. Blue Star plans on using the following equipment that is available on site:

- Excavators;
- Belly-dumper;
- Telehandler;

- Ore truck(s);
- Bulldozer with ripper;
- Skidsteer with skidvac attachment;
- Grader;
- Packer;
- Light vehicles for transport including bus.

Blue Star has mobilised annually since 2020 to the Ulu camp site. The initial year saw a significant number of person-days spent on evaluating and repairing equipment in addition to better understanding the site status. In 2021 a significant dedicated crew of 8-10 people were utilised to maintain and repair equipment required for progressive reclamation and camp operations as well as construct the initial phase of the non-hazardous landfill. An environmental technician was allocated from the exploration group on a part-time basis to undertake regular monitoring and compliance sampling and regular site evaluation tours. During subsequent exploration programs camp operations workers were seconded to undertake progressive reclamation activities as time allowed from their camp duties. This approach has kept key equipment operating, completed soil aeration, completed equipment depollution and dismantling, completed landfilling, undertook evaluation of methodologies for interim PAG rock management, and supported additional research and sampling activities.

In 2025 Blue Star has mobilised a belly-dumper, excavator, telehandler and skidvac to reduce pressure on aging equipment and operate more efficiently with higher equipment availability (less maintenance downtime).

6.3 MINE WORKINGS

The vent raise was backfilled with waste rock and esker sand by the preceding owner; documentation verifying that the work was certified by a qualified engineer has not been provided by the preceding owner. In 2018 Stantec provided a report, *2018 Ulu Project Geotechnical Inspection,* dated 13 November 2018 that confirmed the owner at the time backfilled the vent raise (Section 3.2 Ulu Camp), no recommendation was made for further actions on the vent raise. No subsidence or other indications of potential failure have been noted; the current cover appears to be stable. The vent raise backfill will be monitored during progressive reclamation activities and observations included in the annual reports. As long as the vent raise remains stable the Company believes there is no additional measures to be taken until a final closure plan is required.

The mine portal has been blocked to prevent access by the previous owner; two sea cans were placed in front of the portal to restrict access. The portal will be monitored during progressive reclamation activities and observations included in the annual geotechnical inspection report.

The steel recovered from the demolished fuel tanks is thought to be appropriate for steel closure of mine entrances; however, the dimensions of the remaining intact sheets are unknown. Scrap steel has been set aside for possible reuse. Steel not re-purposed is to be landfilled prior to the cessation of progressive reclamation activities. For the purposes of the progressive reclamation security estimate (Appendix C), it is assumed the vent raise and mine portal are stable and do not require any additional undertakings until final closure.

6.4 MINE SUMP

The mine sump, also referred to as the retention pond, in the interim will have any high priority PAG rock removed from its berm walls replaced with clean esker sands and will be decommissioned as part of the long-term PAG rock management plan currently in development. The geomembrane liner will be removed and disposed of in the Landfill or backhauled for appropriate disposal.

6.5 ORE AND WASTE ROCK

The ore and waste rock stockpiled on surface or used within infrastructure construction (retention pond berm, core laydown area, ore pad) has the potential to generate metal leachate and acidic rock drainage within the next decade. Studies undertaken have better defined time to acid generation with field research indicating some areas with accelerating acid generation potential. Ore placed above the mine sump was initially considered higher risk however it appears to be slightly more stable than some of the mineralised waste rock. As of 2023/24 studies the Company has committed to the development and implementation of a long-term management plan for these problem rock types. Total estimated rock volumes based on historical records approximately 67,500 m^3. Studies have included sampling, laboratory analysis, pH monitoring and water monitoring and reporting of findings with recommendations. The following options are being considered:

- Thermal cover with barrier cover in place;
- Relocation with barrier cover;
- Relocation and neutralization with non-barrier cover;
- Relocation and neutralization with barrier cover.

The ore remaining stockpiled above the Mine Sump and placed within the Mine Sump will be managed with PAG waste rock.

The NWB will be notified 30 days prior to the implementation of the selected option, or as otherwise stipulated under the water licence. Management of the ore stockpile will be undertaken during progressive reclamation activities. As of the date of this revision a ML/ARD waste rock management plan is being developed, in the interim all previously collected PAG and high priority PAG (SRK, 2023) is being placed in an interim storage pile on the Ore Pad and covered with esker sand with the pulled-back areas covered with limestone and sand as per guidance provided (SRK, 2025).

All areas where waste rock was used as a construction material will be reviewed regularly for early determination of ML/ARD risk and managed according to the defined management plan.

During 2025 a proof-of-concept approach was undertaken to managing Priority 1 PAG waste rock by undertaking the excavation and interim piling of PAG rock from the north side of the ore pad (West Lake drainage) to the centre of the ore pad. A vacuum system was used to collect fine materials. Exposed tundra and any unrecoverable materials were covered with limestone 2 kg/m2 and then covered with a minimum of 0.5 m sand (SRK, 2025); the piled PAG rock was covered with at least 0.5 m of sand.

The Interim pile now consists of material removed from the Camp 3 Road, Culvert 6 and now the north side of the ore pad (West Lake drainage). The interim pile contains approximates 5,000 m^3 of material; not all of this material has ben confirmed as at-risk material since it includes all the rock from the West Lake drainage side of the ore pad.

6.6 INFRASTRUCTURE AND EQUIPMENT

6.6.1 BUILDING DEMOLITION

With the possible exception of the core shack and the arctic corridor, all buildings at the Project are collapsible and are designed to be dismantled easily. Blue Star has assessed the condition and usefulness of the buildings on site to support future exploration. Anything deemed no longer useful, irreparable, or unsalvageable has been or will be disposed of in the Landfill. For the purposes of the security estimate, it is assumed that the arctic corridor will be disposed as waste backhaul when the camp is relocated. If it is determined the camp does not need to be relocated in the near future, then the arctic corridor will be left in place after the closure of the Landfill; when needed the Landfill may be re-opened to accommodate the decommissioning of the arctic corridor.

6.6.2 EQUIPMENT DEMOLITION

Much of the existing equipment and parts found on site are no longer useful, are in a mature state of disrepair, or are completely decommissioned. Accordingly, Blue Star considers this equipment suitable for disposal in the Landfill. Prior to disposal, all fluids, batteries, and mercury switches will be removed from the equipment. If air conditioners are present, they will be checked for refrigerants which will be removed by approved personnel prior to dismantling. A portion of the originally listed equipment at site has been depolluted by KEL Environmental Ltd and disposed in the landfill. Table 10 lists the equipment at site, its perceived usefulness in exploration and reclamation activities and its currently recommended path for disposal. Salvageable equipment will be retained and transferred for use and storage when an exploration camp is established closer to the airstrip.

Table 10. List of equipment at site, usefulness and recommended path to disposal.

Make	Model	Description	Up	Down	Ops Nessessity	Disposal Method
Case	SR200	Skid steer	x		x	Backhaul via air
Frost Fighter	OHV-500	Heater	x		x	Backhaul via air
Lincoln	400D	Welder	x		x	Backhaul via air
Le Roi	HQ375	Air compressor	x		x	Backhaul via air
Caterpillar	CS-956	Packer	x		x	Backhaul via land road
Caterpillar	311	Excavator	x		x	Backhaul via land road
Caterpillar	966D	Loader	x		x	Backhaul via land road
Peterbilt	357	Tri axle truck	x		x	Backhaul via land road
Caterpillar	769C	Haul truck	x		x	Backhaul via land road
Kubota	M5400	Tractor w/ cab	x			Backhaul via air
Detroit	523	600V generator	x			Backhaul via air
Caterpillar	D8N	Dozer	x			Backhaul via land road
Caterpillar	14G	Grader	x			Backhaul via land road
Caterpillar	769C	Haul truck		x		Backhaul via land road
Caterpillar	988B	Loader		x		Backhaul via land road
Ford	D600	20 Pax bus	x			Backhaul via land road
Caterpillar	3512	600V generator	x			Backhaul via land road
Volvo	13 speed	Water truck	x			Backhaul via land road
Formost	Commander	Swamp floater	x			Backhaul via land road
Wagner	MT 333	Mine dump truck	x			Backhaul via land road
Wagner	ST 75Z	Mine scoop	x			Backhaul via land road
Elphinstone	R1700	Mine scoop	x			Backhaul via land road
Ford	F350	Pickup		x		Landfill
Ford	F350	Pickup		x		Landfill
Ford	F350	Pickup		x		Landfill
Wagner	MT 444	Mine dump truck		x		Landfill
NC Machinery Co.	RB 322	Jumbo drill		x		Landfill
Tamrock	T10	Jumbo drill		x		Landfill
Gardner-Denver	D825	Air compressor		x		Landfill
Caterpillar	D800	Air compressor		x		Landfill

6.6.3 *WASTE STORAGE AND DISPOSAL AREAS*

The Landfill, a new waste management facility, was constructed in 2021, operated, and will be closed during the progressive reclamation work program. The Landfill will have the capacity to receive approximately 20,000 m^3 of non-hazardous solid waste. It has received to date 9,200 m^3 of non-hazardous waste (SRK 2022b) and 250 m^3 in 2024,and 90 m^3 in 2025 leaving approximately 10,000 m^3 for the remainder of the identified non-hazardous waste. Its location, illustrated on Figure 5, occurs in an area situated between the former Ulu Camp tank farm and the portal access road. It is also situated in proximity to all consolidated waste stockpiled by the previous site operator in 2018/2019. The Landfill is intended to operate during progressive reclamation activities as described in the *Landfill Management Plan*. Details of the Landfill design and engineering drawings are included as an appendix to the *Landfill Management Plan*.

6.6.4 *FUEL STORAGE*

Fuel will be stored in fuel caches. Oil, lubricants, and coolant will be stored within secondary containment.

6.7 HAZARDOUS MATERIALS AND CONTAMINATED SOIL

Hazardous materials and domestic waste generated during progressive reclamation will be handled in accordance with the *Waste Management Plan*. This will include fluids recovered when equipment is decommissioned, and fluids generated when fuel tanks and drums are decontaminated (if needed).

PHC contaminated soil is to be excavated and the resulting floor and sidewalls of the excavations are to meet the soil quality remediation objectives (Table 9). The remediation confirmatory sampling procedure is provided in Appendix B of the *Soil Treatment Facility Management Plan*.

An STF will be constructed and operated to remediate PHC contaminated soil in accordance with the *Soil Treatment Facility Management Plan*. As of the date of this revision the estimated volume of material requiring treatment is 20-25% the original estimated volume; this volume can be managed with in the existing soil holding area (old tank farm) which is a lined facility. As an interim measure prior to STF construction, if required, PHC soils will be excavated and deposited in the soil holding area and aerated and sampled annually. These materials, if they meet re-use criteria (Table 9) may be used as void fill in the landfill or other subsurface re-uses. Soil treatment will use naturally occurring micro-organisms contained in the soil and volatilization to break down PHC in what are known as biopiles. Nutrients and water will be added, and the soil aerated to enhance microbial activity. The treatment of contaminated soil will be restricted to the warmer months when the soil is not frozen or covered with snow. The initial planned location for the STF, as identified in **Error! Reference source not found.**11, is no longer suitable and the location was required for an interim pile of PAG rock. Given the total volume of material to manage is a fraction of the initially estimated volume, a single cell of the designed STF is contemplated and is proposed to be constructed proximal to the originally proposed location. The security cost estimate is based on the schedule and quantity estimates in Table 11, taken from the latest KEL report (KEL 2024) and summarized in Appendix B.

The soil underlying secondary containment in areas used for equipment dismantling and fuel caches during progressive reclamation will be tested when the caches are removed, and any impacted soil will be recovered and treated in the STF or packaged and shipped off-site for treatment. The removal will be done through backhauling (utilizing the return flights of fuel and large item delivery) of the material to a treatment facility off site. The current estimate of contaminated material unsuitable for treatment in the STF and therefore requiring backhaul and off-site is estimated to be 20 m^3 (Stearman, 2020).

TSP piles meeting sub-surface reuse and surface re-use located with the Soil Storage Area were used as void fill in the landfill in 2024. Remaining material that formed the holding area berms was left in place while any material not meeting re-use criteria was spread across the bottom of the holding area to maximize aeration.

Soil depth to liner was estimated in 2025 to be 0.32 m on average; and space available in the holding area was estimated confirming the ability to accommodate all known PHC soils plus 50%.

Upon completion of the soil remediation activities Blue Star intends to assess the condition of and usefulness of the lined facility to be re-purposed to support future exploration. For the purposes of the progressive reclamation security estimate it is assumed the STF will only be 50% constructed and be decommissioned on closure.

Table 11. Soil treatment facility schedule and quantity estimates.

Year	Volume (m^3)	Comments
2	2,000	Placement of estimated volume for treatment within the soil treatment facility. Active season of material aeration.
3	-1,000	Remediated for removal.
4	-500	Remediated for removal.
5	-500	Remediated for removal.
6	To be confirmed	Repeated process based on the yearly remediated quantities and remaining PHC contaminated material.

6.8 BORROW AND QUARRY MATERIALS

Eskers have historically provided a source of aggregate for the Project. Disturbed areas will be rounded and contoured with a bulldozer to minimize erosion. This will involve walking/tramming the machine to and from camp.

Should a rock quarry be established and developed, it will be operated and closed in accordance with the *Borrow Pits and Quarry Management Plan*. Prospective quarry sites and the geochemical characterization program are described in the *Borrow Pits and Quarry Management Plan*.

6.9 MONITORING AND MAINTENANCE

6.9.1 PROGRESSIVE RECLAMATION MONITORING AND MAINTENANCE PROGRAMS

The performance of the backfill in the vent raise, the cover on the Landfill (and the cover on the interim PAG stockpile) will be monitored during progressive reclamation. Observations will be recorded in the annual geotechnical report and the annual NWB report.

Surface and seepage water monitoring will be undertaken in accordance with the water licence during seasonal camp opening and with the annual geotechnical inspection.

Regular inspections of the Landfill are to be conducted to ensure operational compliance and specifically following a rain event when the site is occupied. Surface water quality and Landfill cover performance are to be monitored as outlined in the *Landfill Management Plan*. Reporting and documentation requirements are provided in this plan.

The road and airstrip will be maintained as necessary to complete progressive reclamation activities. The progressive reclamation will extend for a period of 6 years; this will include the time required to complete the progressive reclamation work, remediate the remaining PHC contaminated soil, and achieve final closure of the Landfill and STF.

Monitoring of the STF includes: biopile PHC concentrations and moisture content, surface water accumulation, groundwater quality, visual inspections during operations, and annual geotechnical inspections as outlined in the *Soil Treatment Facility Management Plan*. Maintenance of the facility will be undertaken, along with reporting and documentation, as outlined in the *Soil Treatment Facility Management Plan*.

6.9.2 POST-PROGRESSIVE RECLAMATION MONITORING AND MAINTENANCE PROGRAMS

Upon decommissioning the STF, soil samples are to be taken and compared to baseline soil samples to confirm that there is no migration of contaminants into the foundation or surrounding area, as outlined in the *Soil Treatment Facility Management Plan*.

Landfill cover (and interim PAG rock cover and ore stockpile cover, if used) performance monitoring by a geotechnical engineer will occur in accordance with the water licence.

The post closure period is identified as 5 years and will include continued visual inspections, water quality monitoring, and geotechnical inspection.

6.9.3 CONTINGENCIES

A proposed schedule for undertaking the progressive reclamation activities is provided in Section 1.4. The proponent acknowledges that this may change in consideration of logistics and on-site conditions; however, the intent to carry out the work as licensed remains.

Should monitoring determine that the work as licensed not be a successful means of achieving progressive reclamation criteria and objectives, alternatives will be developed.

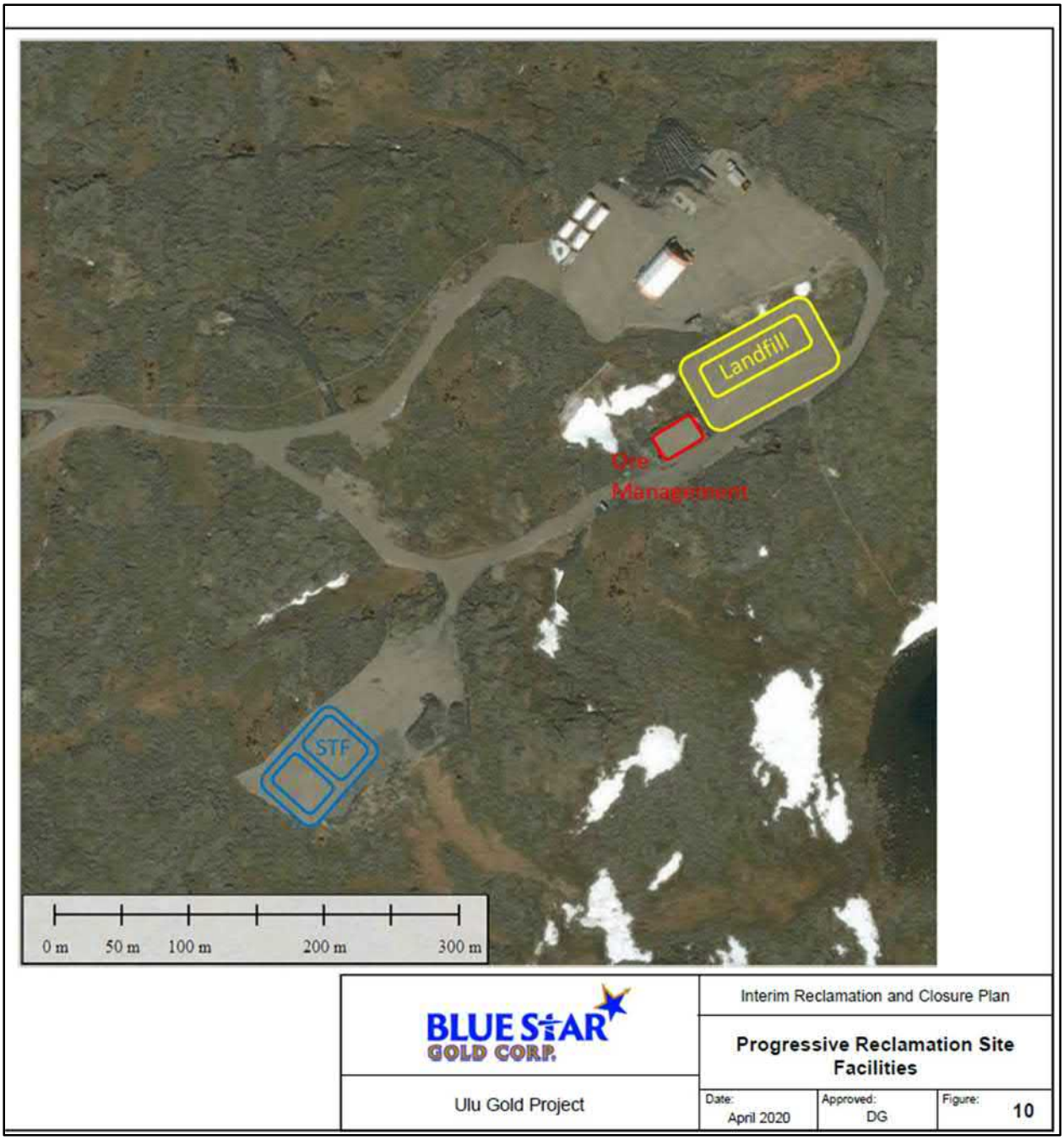


Figure 11. Previously proposed progressive reclamation site facilities.

7.0 TEMPORARY CLOSURE MEASURES

As described in Section 5.1.2, temporary closure of the site may occur for different reasons; however, related closure activities are the same regardless of the reasons for temporary closure.

Monitoring and administrative activities would continue to maintain all compliance requirements. At a minimum, annual site inspections will take place. Typical activities associated with temporary closure of each project component are outlined below.

7.1 MINE WORKINGS

The portal and vent raise will be inspected to ensure there are no areas of subsidence; control measures would be implemented if necessary.

7.2 WATER MANAGEMENT

The water intake hose will be removed from the lake and securely stored on site. The water pump will be drained, and the pump placed into storage.

Site drainage patterns will be inspected, and sediment control features upgraded where necessary.

7.3 BUILDINGS AND STORAGE FACILITIES

7.3.1 ULU CAMP

Temporary camp closure is expected to take approximately three days, using available on-site labour and supervision.

Most consumable supply inventories would be brought to a minimum through scheduled use, reducing the risk of long-term storage at the site. Valuables will be removed from camp to off-site storage. Remaining items key to the closure and start-up of the camp will be secured inside the Weatherhaven residential complex.

The rooms, kitchen, and dry in the residential complex will be cleaned out, fuel disconnected, and doors wired shut to prevent snow and wildlife ingress. All food will be removed to off-site storage. The kitchen will be emptied and cleaned, including the grease traps, so as not to attract wildlife. A small amount of non-perishable food may be left on site in the core shack, as emergency rations.

The greywater sump will be inspected to ensure it is free from wildlife attractants. Erosion control measures will be implemented where necessary.

The doors and windows of the core shack will be boarded to prevent snow and wildlife ingress. Core storage areas will be inspected for stability. The incinerator and surrounding area will be cleaned out, ash and debris removed in accordance with the *Waste Management Plan*, and the incinerator secured in such a manner as to prevent snow ingress into the chambers and wildlife attraction.

7.3.2 FUEL AND MATERIAL STORAGE

Fuel and other materials such as drill additives, lubricants, and coolants may remain in fuel caches and inside secured sea containers for emergency use and to support camp closure and start-up. All barrels and

other storage containers will be inspected to ensure integrity. Fuel remaining in caches will be covered with tarps.

7.4 MOBILE EQUIPMENT

The remaining operational vehicle fleet will be parked inside the vehicle repair shop (when present) with appropriate catchments placed below the vehicles. Batteries will be removed and liquids drained from key pieces of equipment and moved to off-site storage. A skidsteer is to be stored in a sea container at the airstrip over winter to assist in camp opening and temporary closures.

7.5 WASTE MANAGEMENT

Hazardous and domestic waste generated during the season will be managed in accordance with the *Waste Management Plan*.

7.6 DRILLS

Drills will be demobilized from the field and stored in a designated area on site if they are kept on site. Fuel lines will be disconnected, and fuel tanks stored in secondary containment and covered. Drill cuttings sumps will undergo a final inspection to ensure proper containment and erosion control. The area around drill stems will undergo a final inspection to ensure any areas of subsidence have been backfilled in such a manner as to prevent water accumulation.

7.7 MONITORING AND MAINTENANCE

Site components and infrastructure will be visually inspected at least annually and in accordance with the applicable authorizations. The visual inspections will document unexpected conditions as they relate to protection of health, safety and the environment, physical stability, and security. Blue Star management will be notified of all unexpected conditions; these will be investigated and addressed as required. In general, all monitoring and reporting will occur in accordance with the applicable authorizations and will include but not be limited to the following:

- Regular inspections of buildings, Landfill, ore stockpile, STF, borrow pits, and roads.
- Implementation of inspection follow-up actions as necessary.
- Regular inspection of available water storage capacity.

All inspections and monitoring activities will be recorded and filed with the corporate office.

Infrastructure maintenance will be undertaken and will include the following tasks:

- Culvert repair and other road repairs as required.
- Airstrip surface maintenance and repair as required.
- STF maintenance in accordance with the *Soil Treatment Facility Management Plan*.
- Equipment maintenance as required.
- Landfill maintenance in accordance with the *Landfill Management Plan*.

8.0 FINAL CLOSURE MEASURES

Final closure commences when a formal notice of abandonment is filed during the final stages of mining or exploration, or during a long-term shut down event. Once a decision for final abandonment has been made, a Final Closure Plan (FCP) will be submitted to the NWB.

Decommissioning of the site would then commence in accordance with an approved FCP during the next available construction season. It would include either on-site disposal where appropriate and/or removal of camp components and equipment either by air, or via a future winter trail or an all-season road, for off-site disposal.

Post closure monitoring will be undertaken in accordance with an approved FCP and water licence. Inspections will be carried out in accordance with the various authorizations.

Future final closure measures may reasonably include those presented below.

8.1 ROADS AND AIRSTRIP

Upon final closure, all roads would be regraded with the shoulder slopes flattened to reduce erosion and promote positive drainage. All culverts will be removed and the drainage opened to allow natural flow. In order to promote natural growth of vegetation, the roads will be scarified to provide the needed microclimate sites for seed establishment. No active seeding is planned. The roads that are raised above the natural topography will be reduced in height and contoured prior to scarifying.

Depending upon the requirements of the KIA as the landowner, the airstrip may also be regraded and the surface scarified upon final closure recognising that the airstrip will be required to access the site for post-closure monitoring.

8.2 BORROW AND QUARRIES

Esker borrow areas will be contoured to minimize erosion. Quarries, if developed, will be inspected to ensure slopes are suitable for long-term slope stability and water shedding, and any stockpiled overburden will be distributed to promote the establishment of vegetation islands.

8.3 MINE WORKINGS

Upon final abandonment of the Project, the portal will be sealed in accordance with an engineered design. The area immediately in front of the portal will be re-contoured for long-term stability and drainage.

8.4 WASTE MANAGEMENT

Waste items may be disposed of either underground, in a surface landfill, or off-site. Engineered designs for the disposal of bulky materials underground or in a surface landfill will be developed.

8.5 RISK MANAGEMENT

As part of the development of future final closure measures, Blue Star may establish a set of adaptive management terms and apply them to the waste rock that was removed from the underground workings in 1996 and 1997.

8.6 MONITORING AND MAINTENANCE

8.6.1 CLOSURE MONITORING AND MAINTENANCE PROGRAMS

Soil Contamination

The soil underlying those areas used for fuel caches during closure will be tested prior to final closure. Any impacted soil will be recovered, packaged, and shipped off-site for treatment.

8.6.2 POST-CLOSURE MONITORING, MAINTENANCE AND REPORTING

Post-closure monitoring is anticipated to involve water quality monitoring downstream of reclaimed infrastructure and geotechnical stability assessments of the closed landfill and reclaimed areas.

Water Quality

Post-closure, the camp pad and material laydown pads will continue to be exposed to the environment. Accordingly, it is reasonable to anticipate the need for post-closure water quality monitoring for some time. Research conducted during the progressive reclamation activities will better inform the duration of post-closure monitoring.

Geotechnical

Monitoring of the stability of the portal closure measures, cover(s), closed roads, airstrip, borrow, and quarries is reasonable to include in post-closure monitoring.

9.0 FINAL ENVIRONMENT CONDITIONS

9.1 RESIDUAL EFFECTS PREDICTION

Historically, previous site owners used waste rock to construct site infrastructure such as roads, pads, and berms. The potential for negative residual effects as a result of the legacy waste rock on surface better understood after ML/ARD research work at site. Current assessments of waste rock geochemistry indicate that the delay to onset of acidic conditions in the waste rock that has been covered with esker sand is likely to be decades however geochemical studies of waste rock left uncovered indicate near term onset of acidic conditions (see Appendix A). To address current and potential future residual effects at closure options are being evaluated to inform interim mitigation measures and a long-term ML/ARD rock management plan in the near term.

9.2 LANDFORMS AND VEGETATION

Revegetation of disturbed areas at the Project will focus on the enhancement of the ground surfaces by promoting natural reintroduction of native species while reducing the opportunity for erosion. Scarifying of hard-packed surfaces to open up the ground will provide the required microclimate for natural plant growth, enhancing seed entrapment, moisture retention, and wind protection. The roads, currently raised above the natural topography, will be reduced in height and contoured prior to scarifying.

The site has been constructed to provide a level pad for camp construction and materials laydown. This grading is only minimally raised above the fractured rock outcropping and boulders, leaving very little flexibility in the final topography. At this time, it is anticipated that the areas near the natural slopes will be shaped to blend in with the natural topography.

10.0 CLOSURE SCHEDULE AND EXECUTION STRATEGY

10.1 REGULATORY FRAMEWORK

Should Blue Star decide to proceed to final closure at Ulu in the future, an application will be submitted to the Nunavut Planning Commission (NPC) for a conformity review. It is reasonably anticipated that the NPC will refer the application to the NIRB for screening or review, after which Blue Star will apply to the NWB for an amendment to its water licence to approve a Final Closure Plan. Depending on the surface and subsurface agreements in place at the time, related submissions may need to be made to the KIA, the Government of Nunavut, the Government of Canada, and NTI.

10.2 FINAL CLOSURE SCHEDULE AND EXECUTION STRATEGY

Final closure will proceed once an FCP has been approved and the water licence has been amended. The closure activity schedule will be determined during planning of final closure; it will consider the site conditions existing at that time, as well as equipment and workforce availability and cost. Closure work will be undertaken using equipment previously transferred to the adjacent exploration site, as described in Section 6.6.1. Depending on the status of exploration activities and available bed space, the establishment of a temporary camp may be needed to support the closure.

11.0 RECLAMATION AND CLOSURE LIABILITY

Table 12 provides a summary of the costs for completing the tasks outlined in Section 6.0. A detailed breakdown of these costs is included in Appendix D. Blue Star estimates the current reclamation security as approximately $ 1.689 million and is therefore requesting a reduction of security to the amount of $1.709 million.

The financial security held by the Minister of Crown-Indigenous Relations and Northern Affairs (CIRNA) has remained largely the same, approximately $1,680,000, since 2000 ($1,685,542 is currently held by CIRNA). An additional $943,835 is held by the KIA. This includes $750,000 Blue Star posted as additional financial security with the KIA to address the shortfall in reclamation security held by CIRNA and the KIA during the licence assignment process. It should be noted that in the time between licence assignment to Blue Star and the submission of this plan, significant progressive reclamation has been undertaken on site.

Since the submission of the initial plan and this current revision the Landfill has been created with deposits made into it, the contaminated soils have been studied in more detail and aerated where possible reducing the amount of material requiring treatment. A recognition of residual effects from waste rock used in infrastructure creation having a shortening delay to onset of acidic conditions has also occurred in this period.

A staged approach to security administration is considered suitable; this will allow exploration to proceed, planned reclamation to be undertaken as was contemplated in the licence assignment process, and additional related progressive reclamation activities to be undertaken as needed in the future.

The Licensee acknowledges that following completion of progressive reclamation, historical mine-related infrastructure and liabilities will remain on site, such as roads and pads, airstrip, mine portal, and waste rock. Prior to advancing the project to construction and operations, an assessment of future closure requirements and of the appropriate financial security needed for implementation will be required. The

Licensee commits, through the amendments to the licence and approval of this ICRP, to submit and maintain appropriate financial security as the project moves through the exploration and mine life cycle.

Table 12. Progressive reclamation cost estimate.

Task	2020 Costs C$	2024 Costs C$
Direct Costs	***1,074,749***	***449,486***
Building Demolition	33,491	3,941
Non-Hazardous Waste Landfill	287,597	95,649
Soil Treatment Facility	517,773	301,433
Ore Management	80,411	0
Mine Workings	55,760	0
Hazardous Material Management	55,492	19,612
Borrow & Quarry	4,807	5,657
Construction Material Transport to Site	39,418	23,194
Indirect Costs	***1,479,617***	***1,239,367***
Mobilization	421,140	493,081
Waste Rock ML/ARD Investigation	43,418	150,000
Monitoring and Reporting	205,539	160,640
Management and QA/QC	145,600	100,800
Bonding/Insurance	10,747	4,495
Health and Safety	10,747	4,495
Project Management	53,737	22,474
Engineering	53,737	22,474
Contingency	***534,950***	***280,908***
Total	**2,554,367**	**1,688,854**

12.0 HOOD RIVER, ROMA & OTHER REGIONAL ACTIVITIES

12.1 HOOD RIVER CAMP 2019-2021

This temporary camp underwent final closure as outlined in the previous version of this plan. No other temporary camps have been established.

12.2 ROMA PROJECT

No temporary camp or fuel caches have been established in the Roma project area. All activities are supported from the Ulu camp.

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Appendix A: Geochemical Guidance Report

Appendix B: PHC Contaminated Soils Update

Appendix C: Draft Landfill Report

Appendix D: Progressive Reclamation Cost Estimate

FINAL

Geochemical Guidance for Reclamation of Waste Rock at Ulu Camp

Ulu Gold Project, Nunavut, Canada

Blue Star Gold Corp

SRK Consulting (Canada) Inc. ■ CAPR003914 ■ September 22, 2025

FINAL

Geochemical Guidance for Reclamation of Waste Rock at Ulu Camp

Ulu Gold Project, Nunavut, Canada

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File Name:
CAPR003914_Ulu_ReclamationGuidance_Report_20250922_FNL.docx

Suggested Citation:
SRK Consulting (Canada) Inc. 2025. Geochemical Guidance for Reclamation of Waste Rock at Ulu Camp. FINAL. Prepared for Blue Star Gold Corp: Vancouver, BC. Project number: CAPR003914. Issued September 22,. 2025.

Cover Image(s):
Aerial view of on-going reclamation activity at the ore pad. Photo taken by Blue Star Gold Corp.

Contents

Tables

Figures

Useful Definitions

This list contains definitions of symbols, units, abbreviations, and terminology that may be unfamiliar to the reader.

AG	Acid generating
ARD	Acid rock drainage
ML/ARD	Metal leaching and acid rock drainage
PAG	Potentially acid generating

1 Introduction

Blue Star Gold Corporation (Blue Star) has requested SRK Consulting (Canada) Inc. (SRK) to provide guidance for on-site reclamation activities at the Ulu reclamation project in Nunavut with the goal of minimizing risks associated with metal leaching and acid rock drainage (ML/ARD). Water quality monitoring has been conducted on an annual basis since 2020 to assess the ML/ARD conditions at the Ulu project. ARD conditions are seasonally present (July/August) within the waste rock pad and water quality has deteriorated at some monitoring locations since 2020 (SRK, 2025a).

SRK is developing an interim ML/ARD management consolidation and cover plan to manage the high-risk acid generating (AG) and potentially acid generating (PAG) rock at the Ulu project (SRK, in progress), with the final goal being a long-term ML/ARD management plan. A range of cover options has been provided to Blue Star to progress cover placement while understanding the risks of each configuration (SRK, 2022a). Due to areas of the waste rock and mineralized rock beginning to show indicators of ML/ARD, the decision made by Blue Star is to implement an interim management approach to minimize the risk of unwanted release of leachate into the environment while the long-term ML/ARD plan is finalized. Recommendations for thermal and barrier cover options have been presented to Blue Star (SRK, 2022b; SRK, 2025b).

This memorandum provides geochemical guidance for interim closure activity on-site that has been underway as of May 2025. The infrastructure involved in the remediation work includes AG and PAG rock at the ore pad and the waste rock-portal pad. The guidance has been based on an initial request provided on June 25, 2025 by SRK. The guidance addresses principally the objective of preventing the AG/PAG rock from further acidifying and impacting water quality and drainage in the vicinity of the infrastructure.

2 Site History

The Ulu project was historically an advanced gold exploration project with underground development occurring in 1996 and 1997. An estimated 126,900 tonnes of waste rock were produced during the underground exploration program (Wolfden, 2005). Development waste rock brought to surface was used to construct the camp pad, sections of the road network and to build the ore pad and waste rock-portal pad (Figure 1). Estimated volumes in each of the pads from BGC (2003) are 15,000 m^3 in the camp pad, 28,000 m^3 in the ore pad and waste rock-portal pad including approximately half of which is in a waste rock stockpile on the waste rock-portal pad (4,300 m^3). The pads are estimated to be around 1 to 3 m thick.

Approximately 2,200 tonnes of mineralized bulk sample were brought to surface and temporarily stored on the ore pad prior to removal off-site (Cowley et al, 2015). An estimated 750 m^3 of this remained on the ore pad in a stockpile when the project was abandoned, until the mineralized rock was subsequently relocated to the portal-mine sump area between 2018 and 2019.

Sand and gravel from an esker approximately 6 km south of the Ulu camp was also used as a construction material at the site and overlies waste rock on much of the ore pad and parts of the camp pad. Based on test pit programs, the earliest (central) part of the camp pad is built from esker material with waste rock additions around the margins, as development rock from underground became available.

2020

As part of Blue Star's reclamation activities in 2020, much of the esker sand on the ore pad surface was stockpiled along the center of the pad to expose the underlying rock. The esker sand had reportedly been up to a meter thick in places (A. Stearman, personal communication, 2020). Waste rock from an area of approximately 6 m by 50 m along the northwest edge of the ore pad (that had not historically been covered in esker sand) was removed by excavator and stockpiled in preparation for building a new soil treatment facility (STF) on the ore pad. Some of the waste rock was used to fill in low points on the ore pad STF site and was then covered with the stockpiled esker sand (A. Stearman, personal communication, 2021). Some of this waste rock remained stockpiled on the ore pad. Both the stockpiled waste rock and residual waste rock on the tundra along the northwest edge of the ore pad were identified as acid generating based on rinse test results (SRK, 2021). The stockpiled waste rock was covered with tarps in July 2022 to limit precipitation ingress. The STF has not yet been built pending decisions on management of the rock in and on the ore pad.

2021

During August and September 2021, acid generating waste rock removed from camp 3 (200 m^3) and culvert 6 (68 m^3) during remediation works was temporarily relocated to the ore pad (SRK, 2022c). The waste rock was subsequently covered with tarps, to limit precipitation ingress, pending development of a long-term management plan for the larger volumes of acid generating and potentially acid generating (PAG) rock at the Ulu site.

The broader Ulu property is undergoing exploration by Blue Star; however, infrastructure at the Ulu camp site that is not required for the exploration program is being reclaimed. A landfill facility was constructed to the south of the camp pad during the 2021 season, and stockpiled scrap materials from various locations around the camp pad and on the waste rock-portal pad were removed and relocated to the landfill and covered with esker sand. The landfill was contoured such that drainage at freshet should run-off the frozen esker sand cover and into the compliance monitoring site ULU-15 and subsequently into down-gradient seeps towards East Lake.

2024

During August and September 2024, acid generating waste rock from within the northwest edge of the ore pad, and residual waste rock lying on the tundra that was exposed in 2020, was relocated by Blue Star onto the ore pad, as part of initial consolidation works in preparation for covering for interim management. The rock was added to the existing temporary stockpile at the center of the ore pad.

Figure 1: Site layout prior to reclamation activity at ore pad (pre-2024)

3 Site Conditions and Assumptions

The following general assumptions and known site conditions, based on previous studies, were used to provide the guidance:

- Around 90% of the waste rock in the infrastructure pads is classified as AG/PAG.
- Waste rock was acidifying to some extent in all the pads, particularly in near-surface rock, and down the outer edges of the pads, as shown by localized rinse pH values of 2.9 to 3.9.
- Most waste rock at depth had circum-neutral rinse pH (6.5 to 8); however, acidic areas existed at depths of up to 2 m within the pads, associated with areas that were not covered in esker sand, and with higher than typical sulphide content.
- Based on calculations using all the available datasets, delay to onset of acidification estimates for PAG rock not covered in esker sand ranged from less than a year to six years (from 2020) for “worst case” material, depending on the depth, and six to 16 years for material with “typical” ARD potential, again depending on the depth. Where rock had historically been covered in esker sand, the estimated delay to ARD was longer at 11 to 25 years (from 2020).
- Seepage from the infrastructure pads is impacted by metal leaching at levels above British Columbia and CCME protection for aquatic life water quality guidelines for some parameters, which is predominantly being driven by oxidation of pyrrhotite and pyrite (as the dominant sulphides) along with trace chalcopyrite, sphalerite, arsenopyrite and millerite; resulting in widespread leaching of sulphate and zinc, in addition to leaching of cadmium, iron, manganese, nickel, and selenium in ore pad seepage, and leaching of arsenic from mineralized rock.
- Trace element leaching is expected to increase if pH declines further or if local acidic conditions within the pads become more widespread.
- Disturbance of the waste rock and mineralized rock results in a release of stored acidity and oxidation products associated with exposed surface area and greater reaction with oxygen. This has been evident in water quality data from the north-edge of the ore pad where rock was disturbed in 2020.

The guidance is provided based on commonly accepted first principles. Innovative approaches could also be used but will likely be challenging for regulatory approvals. The measures described are primarily targeted to address acid generation potential which will also address metal leaching potential.

4 Guidance

4.1 General

The following general guidance is provided:

- Relocating waste rock and mineralized rock involves the following steps: excavation down to tundra floor with excavator bucket and loader, removal of small-medium rock pieces by hand, followed by skid-vac to collect finer grained material. This method has been demonstrated to remove most of the material; however, some waste rock and mineralized rock material may remain due to difficulty relocating material from the tundra surface.
- Disturbed areas where waste rock and mineralized rock have been removed should be covered with limestone and esker sand. The limestone addition will provide additional alkalinity to neutralize any residual fines[1] that may be classified as AG/PAG, while the esker sand cover will prevent transport of residual fines and limestone material. It is recommended that the limestone be evenly applied across the disturbed surface as best as possible. The amount will vary depending on the characteristics of the waste rock and mineralized rock for a given infrastructure area. After application of limestone material, but prior to esker sand placement, it is recommended that representative grab samples be collected for acid-base accounting (ABA) analysis. The grab samples should capture surface material only (upper 1 to 2 cm), where the matrix will be a mixture of residual fines, tundra soil, and applied limestone.
- Relocating AG/PAG rock should be done as quickly as possible, and the excavated area should be covered with limestone and esker sand immediately; ideally each disturbed area should be covered within a given operating season (May-August). This will help minimize release of acidity and constituents of concern associated with sulfide oxidation and dissolution soluble phases.
- It is recommended that rinse pH testing be performed at two sample depths on rock that is being relocated: one each at the surface (but below the esker sand layer) and foundation of the infrastructure pad. For areas where material is being relocated sequentially, it is recommended that rinse pH testing be conducted in one to three transects (depending on the spatial expanse), perpendicular to the direction of removal, on samples from every other row of waste rock removed. Grab samples from the excavator bucket are sufficient.
- Crushed limestone will need to be sourced externally from site as there is no suitable material near Ulu. It is recommended that the sourced limestone be tested for geochemical and physical properties prior to purchase. Due to the short season on-site at Ulu, Blue Star has purchased limestone material from Lime Stone Cowboys (Chetwynd, British Columbia) to be used for reclamation activity at the ore pad. SRK reviewed documents provided by Lime Stone Cowboys (GeoNorth Engineering, 2018) and recommends additional characterization on two subsamples: ABA, particle size distribution, and shake flask extractions.

[1] Reactive material here are classified as fines < 2 mm. This was found to be approximately 10% of the waste rock material at the ore pad from SRK (2021).

- Seepage monitoring locations should be re-assessed following relocation of mineralized rock and waste rock during interim and post-closure reclamation.

4.2 Ore Pad

The ore pad represents the area with the highest risk of developing acidic conditions as described by SRK (2025a). The ore pad is located on a local drainage divide where water flows through the subsurface from the northern portion of the ore pad to the northwest (drainage point at Lake G43) and from the southern edge of the ore pad towards the southeast. Drainage paths within the ore pad remain unknown; however, an electromagnetic geophysical survey is being performed in July 2025 to further examine these drainage paths. The extent of material that requires relocation at the ore pad is shown in Figure 2.

Highest priority areas in the ore pad that require immediate management are:

- The northern edge of the ore pad (i.e., north side of the drainage divide) where acidic conditions and metal leaching are seasonally observed at Seep-05.
- The southeast part of the ore pad where mineralized rock was previously stockpiled (this part of the ore pad is currently at high risk of exceeding the NWB effluent quality limit for zinc).
- The southern edge of the ore pad where there is limited sand cover (also at risk of generating ARD and more severe metal leaching).

The following guidance is provided for the following areas:

- Northern edge of ore pad:
  - Reclamation is currently underway at the northern edge of the ore pad where waste rock and mineralized rock is being pulled back towards the edge of the drainage divide. For efficiency, Blue Star has positioned the excavator the dump truck on the temporary accessway (within the original ore pad extent) with the excavator sitting on the ore pad to more efficiently load the dump truck. The temporary accessway for the dump truck has been covered with esker sand. Following removal of most of the material a dozer is used to scrap as much of the remaining waste rock as possible. At which point the skid-vac is used to pick up residual fine material as best as possible. SRK agrees with this approach.
  - Complete removal of all waste rock material is challenging due to the uneven and rough terrain of the underlying tundra. After removal of as much waste rock as possible, it is recommended that limestone be placed directly on the residual waste rock material followed by an esker sand cover of 0.5 m. The amount of limestone material required is presented in Section 4.2.1.
  - SRK inspected the reclamation efforts at the northern edge of the ore pad during a site visit (August 17–20, 2025). At the time of the site visit the majority of the waste rock had been removed down to the tundra surface (Figure 3 and Figure 4). The amount of waste rock remaining varied depending on the difficulty to remove material given the uneven tundra surface below the waste rock. Figure 5 to Figure 9 shows the range of waste rock material

remaining following reclamation activity at the northern edge of the ore pad.[2] This appears to range from nearly minimal waste rock material left to up to ~15 cm of material remaining; however, the amount of material remaining is typically less than 5 cm. Given the large variability in the amount of material remaining, an upper value of 10 cm of waste rock material remaining was used to determine the amount of limestone required for reclamation (Section 4.2.1).

- Southern edge of ore pad:
  - Blue Star plans to remove waste rock and mineralized rock to slope the ore pad for closure. A similar approach to the northern edge will be adopted for reclamation at the southern portion of the ore pad. SRK recommends that the southern ore pad material be removed progressively in smaller sections that are then immediately covered with limestone followed by esker sand to minimize exposure and oxidation of undisturbed material. The southern edge will be gradually sloped northward and covered in esker sand for closure (SRK, 2022b; SRK, 2025b).
  - In areas where waste material is removed down to the tundra floor at the southern ore pad it is recommended that limestone be applied directly on the disturbed area that may contain residual waste rock material followed by esker sand.

Waste rock and mineralized rock that has been relocated to the center of the ore pad will be at risk of developing more severe acidic conditions, which could accelerate metal leaching and rapidly deplete carbonate from underlying rock in the ore pad, due to increased exposure to oxygen and precipitation. Therefore, it is recommended that relocated waste rock and mineralized rock be covered for interim closure with a minimum of 2 m esker sand as quickly as possible, within one to two field seasons, following closure recommendations (SRK, 2022b; SRK, 2025b). In the meantime, the relocated ore pad material should remain in the center of the ore pad as this will help minimize discharge of acidity and associated constituents of concern given longer flow paths and potential for neutralization within lower waste rock material.

[2] Note that the Figures 5–7 show small amounts of residual waste rock scattered on tundra soil and residual esker sand following reclamation efforts. Whereas Figures 8 and 9 show the amount of waste rock remaining down to tundra soil.

Figure 2: Outline for waste rock removal areas at north and south ore pad (green-hatched area) and the groundwater divide (blue line).

Source: NACAPR003914 Ulu Gold 2025 Scope of Work - Internal\Task 400 Reclamation Support\Geochemical Guidance Memo\Figures

Figure 3: Waste rock remaining on northern portion of ore pad as of August 18, 2025 (facing east from center).

Figure 4: Waste rock remaining on northern portion of ore pad as of August 18, 2025 (facing west from center).

Source: NACAPR003914 Ulu Gold 2025 Scope of Work - Internal\Task 400 Reclamation Support\Site visit\Photos

Figure 5: Example one of waste rock remaining on north ore pad area.

Figure 6: Example two of waste rock remaining on north ore pad area.

Figure 7: Example three of waste rock remaining on north ore pad area.

Source: NACAPR003914 Ulu Gold 2025 Scope of Work - Internal\Task 400 Reclamation Support\Site visit\Photos

Figure 8: Example four of waste rock remaining on north ore pad area (~15 cm depth).

Figure 9: Example five of waste rock remaining on north ore pad area (~5 cm depth).

Source: NACAPR003914 Ulu Gold 2025 Scope of Work - Internal\Task 400 Reclamation Support\Site visit\Depth Test Pits

4.2.1 Limestone Neutralization Calculation

The amount of limestone required to offset potential acidification of residual fine-grained material following relocation of rock at the ore pad is calculated based on the target NPR to ensure that acid general potential is offset by limestone:

$$NPR_{Mix} = \frac{M_{fines} TIC_{fines} + M_{LST} TIC_{LST}}{M_{fines} AP_{fines} + M_{LST} AP_{LST}}$$

Reorganizing yields:

$$M_{LST} = M_{fines} \left(\frac{TIC_{fines} - NPR_{Mix} AP_{fines}}{NPR_{Mix} AP_{LST} - TIC_{LST}} \right)$$

Where the mass of residual fines (M_{fines}) is calculated assuming a bulk density of 1,800 kg/m^3 and a total volume of residual fines remaining. The target NPR for the mixture (NPR_{mix}) is set to 3 to allow for mixing inefficiencies. Table 1 provides a summary of parameters used for the above equation and the two calculation scenarios.

There are two potential scenarios considered here for the amount of limestone required to offset potential acid generation from waste material at the ore pad, the average and upper-case scenarios. The average case would require 5.7 tonnes $CaCO_3$ (or 1.0 kg $CaCO_3$/m^2) and the upper-case scenario would require 12 tonnes $CaCO_3$ (or 2.0 kg $CaCO_3$/m^2). It is recommended that the upper-case scenario value be used for limestone placement (2.0 kg/m^2) given the variability in the amount of waste rock material remaining on the tundra surface.

Table 1: Summary of parameters used to calculate mass of limestone required for acid neutralization at disturbed areas at the ore pad.

Parameter	Value
Disturbed Area at North Edge (m^2)[1]	4,117
Disturbed Area at South Edge (m^2)[1]	1,577
Maximum Thickness of Residual Waste Rock (cm)[2]	10
Thickness of Residual Fines (cm)[3]	1.0
Total Volume of Residual Fines (m^3)[4]	102
NPR_{mix}	3
AP_{LST}[5]	2.2
TIC_{LST}[5]	954
AP_{Fines} (average value)[6]	21
AP_{Fines} (maximum value)[6]	37
TIC_{Fines} (average value)[6]	11
TIC_{Fines} (minimum value)[6]	3.3

Sources NACAPR003914/Internal/Task 400 Reclamation Support/Geochemical Guidance Memo/[CAPR003914_Ulu_LimestoneCalc_Rev00.xlsx]

Notes:

[1] Values provided by Darryl Godley (SRK).

[2] Based on field observations following waste rock relocation. Note that there is a large variability in the amount of waste rock material remaining; however, this is the most conservative approach.

[3] Assuming a maximum thickness of 10 cm waste rock remained following relocation and assuming 10% of the remaining material is reactive (i.e., particle size <2 mm).

[4] Calculated total volume from total disturbed area and thickness of residual fines.

[5] Values from GeoNorth Engineering (2018).

[6] Values for ore pad fines (SRK, 2021).

4.3 Waste Rock-Portal Pad Area

The waste rock-portal pad area is the next area that requires reclamation following the ore pad. Mineralized rock stockpiled above the portal is classified as PAG. Seepage drains into the mine sump pond (where the integrity of the liner is questionable), the portal pond, or a third adjacent temporary pond directly to the west which is thought to drain (sub-surface) to Seep-02 and then into East Lake.

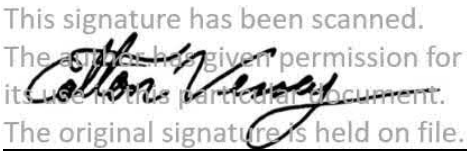
Blue Star has proposed to dewater the portal pond by discharging towards East Lake (with monitoring at either ULU-7, Seep-10, Seep-9 or Seep-2) followed by backfilling the portal area with mineralized rock located above the portal pond and waste rock located southeast of the portal pond. Note that draining the portal pond is not necessary but may provide additional advantages to rock placement. Closure of this area will involve generating a natural slope towards the southeast and covering the material with esker sand to create an interim thermal barrier and later incorporating the long-term ML/ARD cover design.

SRK agrees with the above approach and provides the following guidance:

- It is recommended that the most severe material at risk of acidification and metal leaching (i.e., PAG material) be placed within the portal pond below the natural water level (i.e., not yet acid generating). Once the reclamation activity is complete the back filled portal pond will fill with water and eventually freeze. This strategy will limit acid generation and potential release of constituents of concern. Note that already acid generating rock should not be placed in the portal pond entrance since this material may flush oxidation products.
- During placement of the esker sand thermal cover for closure SRK recommends blending with limestone to provide additional buffering capacity. Rehandled mineralized rock and waste rock within the waste rock-portal area will result in increased exposure to atmospheric conditions that may release stored acidity and constituents of concern. The blended esker sand and limestone material will therefore provide buffering capacity to offset acidity until the thermal cover can be constructed and permafrost conditions develop at depth.

Closure

This report, Geochemical Guidance for Reclamation of Waste Rock at Ulu Camp, was prepared by



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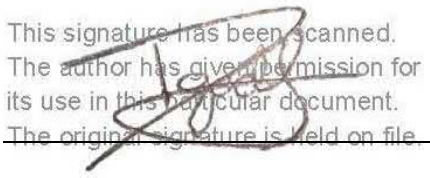

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Corporate Consultant (Geochemistry)

All data used as source material plus the text, tables, figures, and attachments of this document have been reviewed and prepared in accordance with generally accepted professional engineering and environmental practices.

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Memo

To: **Grant, Environmental Committee**
From: Darren Lindsay
cc: Enviro Technician, Camp Operations
Date: September 23, 2025
Re: Contaminated soils update

Introduction

This memorandum updates the 2019 contaminated soils investigation (SRK, 2020) with activities undertaken in 2021, 2022, 2024, 2025 continuing the investigation of areas where petroleum hydrocarbon (PHC) products were historically handled on the Ulu Gold project site, the definition of the extent of impacts, and the re-use of soils that met the applicable criteria. The initial objective of the proposed Soil Treatment Facility (STF) was to treat soils until they met Canadian Council of Ministers of the Environment (CCME) parkland land use (PL) guidelines for surface soils, surface soil re-use (Table A).

Background

Previous operators moved approximately 1,220 m^3 of PHC impacted soil from historic Camp 3 into the old Ulu tank farm (references within SRK, 2020) now known as the soil holding area at Ulu Camp. Previous operators also estimated approximately 3,042 m^3 of PHC impacted soils was present at the Ulu exploration site (references within SRK, 2020).

In 2019, twenty-seven test pits were excavated and sampled with the following results (SRK, 2020):

- Camp 3 Tank Farm area – all samples met CCME PL guidelines.
- Camp 3 Tank Farm relocated soils (in Ulu camp soil holding area) – samples exceeded CCME PL guidelines for either surface re-use or for sub-surface re-use.
- Main Tank farm (Ulu camp soil holding area) interior samples exceeded CCME PL guidelines for sub-surface re-use.
- Main Tank farm (Ulu camp soil holding area) perimeter samples to the east exceeded CCME PL guidelines for sub-surface re-use while other samples met CCME PL guidelines for surface re-use. It is suspected that the Tank Farm liner has been compromised with contamination spreading to the east.

- Day Tank area, removed in 2018, (immediately south of shop footprint) – internal sample exceeded CCME PL guidelines for surface and sub-surface re-use; perimeter samples met CCME PL guidelines for surface soil.
- Shop Floor – most samples exceeded CCME PL guidelines for sub-soils. The reporting indicated that approximately 30m^3 of this material was backhauled from site to Kitikmeot Environmental Ltd (KEL) however no clear reference has been located to support this.
- Parking Areas – all but one sample met CCME PL guidelines for surface soils.

Conclusions of the SRK Consulting Ltd (SRK) memorandum indicate that the stockpiled soils from the Camp 3 Tank Farm might be sufficiently remediated to meet subsoil objectives when they are offloaded and that a total soil volume requiring treatment was estimated to be 5,400 m^3, an increase of ~27% over the previous operators estimate.

Table A: Soil Quality Remediation Objectives for Petroleum Hydrocarbons

Objectives for Coarse-Grained Soils	F1 mg/kg	F2 mg/kg	F3 mg/kg	F4 mg/kg
Surface (0 to 1.5m depth)	210	150	300	2,800
Subsoil (>1.5m depth)	700	1,000	2,500	10,000

Blue Star Gold PHC Soils Activities

2020 (Peridotite, 2020)

- Contaminated soils were relocated to Ulu camp soil holding area.
- PHC soils localised to area of former Day Tank.
- Soil from shop floor shipped offsite for treatment (~6 m^3); estimated 20 m^3 remains to be shipped offsite.
- Contaminated soils in the Ulu camp soil holding area separated into ~150 m^3 piles; all results to date indicate these soils meet CCME PL sub-surface reuse criteria.
- Revised PHC soils volume that will require treatment to meet CCME PL sub-surface guidelines is 2,280 m^3. Of this 2,000 m^3 is located within the soil holding facility.

n.b. the re-piling of materials within the soil holding facility means that sampling history of the material cannot be tracked back farther than November 2020. This was the season the TSP-# pile numbers were established.

2021 (KEL, 2021)

Blue Star Gold contracted KBL Environmental Ltd (KEL) to undertake sampling of the stockpiled PHC soils.

- An estimated 1,300 m^3 of material was sampled in June and in July.
- Four stockpiles and one berm section required further treatment (405 m^3); TSP-5, TSP-9, TSP-10, TSP-11, Berm2
- All other sampling indicates soils are available for subsurface reuse and in some cases for surface re-use.
- No material required off-site disposal.

Blue Star, at the guidance of SRK Consulting Ltd (SRK), conducted additional sampling across the site (upper staging, lower staging) that had indications of PHC pad materials (mixed soils and rock) (section 3.3.2, BSG, 2022).

2022 (KEL, 2022)

Blue Star Gold contracted KEL to undertake sampling of the stockpiled PHC soils in August.

- Stockpiles resampled were TSP-5, TSP-9, TSP-10, TSP-11
- All samples met CCME PL guidelines for subsurface re-use.
- Berm2 was not resampled.
- *All material within the soil holding area and most of the surrounding berm meet CCME PL guidelines for sub-surface re-use and in some cases surface re-use.*

Additionally, KEL completed thirty-nine test pits across the site. (KEL, 2023).

- Impacted soils near the camp shop estimated 170 m^3 requiring treatment and 400 m^3 meeting CCME PL subsurface re-use criteria.
- Impacted soils near the former tank farm estimated 100 m^3 meeting CCME PL subsurface re-use criteria.
- Impacted soils near the upper staging area estimated 1,260 m^3 meeting CCME PL subsurface re-use criteria.
- Impacted soils near the lower staging area estimated 170 m^3 meeting CCME PL subsurface re-use criteria.

2023

No sampling program undertaken during the season however stockpiles were fully aerated using an excavator (Figure 1).

2024

Blue Star Gold contracted KEL to undertake sampling across the site in areas of concern identified in previous sampling efforts (BSG, 2022 and KEL, 2023).

KEL completed forty-two test pits collecting sixty samples across the site with analysis to identity natural versus human-caused hydrocarbon sources (KEL, 2024). KEL identified approximately 868 m3 of material requiring treatment and approximately 138 m^3 that meets CCME PL guidelines for sub-surface re-use.

n.b. these are "bank" volumes therefore material expected to be placed in a facility is closer to 1.3 times "bank" volume or ~1,128 m^3.

Blue Star Gold undertook and completed a placement of non-hazardous waste materials in the Landfill. The void fill material was the stockpiled soils within the soil holding facility that met CCME PL guidelines for sub-surface or surface re-use. PHC soil material remaining in the soil holding facility was spread across the floor of the holding area to maximize aeration.

2025

A soil hand auger and a portable gas meter (RKI Eagle II) calibrated to hexane and isobutylene standards were evaluated as tools to further define edges of PHC soils prior to excavation and piling in the soil holding facility.

The depth of PHC soils remaining in the soil holding area was measured in test pits used to examine the liner and a volume of 334 m^3 was estimated. This material was not sampled although based on previous sampling this material should meet CCME PL subsoil guidelines.

One "mega-bag' containing approximately 3 m^3 of PHC soils that had been placed near and within the soil holding area since 2019 was placed in a drum and sent offsite for disposal. Two drums were filled with additional material from the upper laydown area were also shipped offsite for disposal. No other action was undertaken with PHC soils this season.

Conclusions and Recommendations

Samples that the portable gas meter did not detect organic vapours with olfactory indications of mild PHC odours had results that meet CCME PL guidelines for surface soils; with moderate odours samples met CCME PL sub-surface re-use guidelines, and if the portable meter detected hexane >100ppm and isobutylene >10 ppm then the samples did not meet CCME PL surface re-use criteria (SRK, 2019). This confirms the procedure previously identified for evaluating and segregating PHC contaminated materials.

Approximately 20 m^3 of material may need to be shipped off-site for disposal; approximately 1,200 m^3 of material requires treatment and all other material can be used as surface cover (Figure 2).

Reclamation research for the petroleum hydrocarbon contaminated soils indicates that approximately 1,200 m^3 of material requires treatment to meet CCME PL sub-surface guidelines. This is far below the initial volumes estimated that would require the originally proposed Soil Treatment Facility. In addition, over the study period, natural processes (aeration) are positively impacting the remediation timelines. In the interim it is recommended to excavate and relocate materials needing treatment to the soils holding facility and aerate and sample regularly.

The last location requiring evaluation is below the existing soil holding area. The volume below this area is estimated to be 461 – 668 m^3. As this material is under a liner it is expected that only a small volume of material may require treatment to meet CCME surface re-use criteria. It is yet to be evaluated by test pitting and should be considered a priority final item to be undertaken.

Current recommendations are to evaluate below the lined soil holding facility to confirm that there are no problem soils. To use the soil holding facility as the area to treat the soils using natural aeration until they are eligible for sub-surface reuse. And then to place the subsurface re-use soils either in the landfill or other applicable structure.

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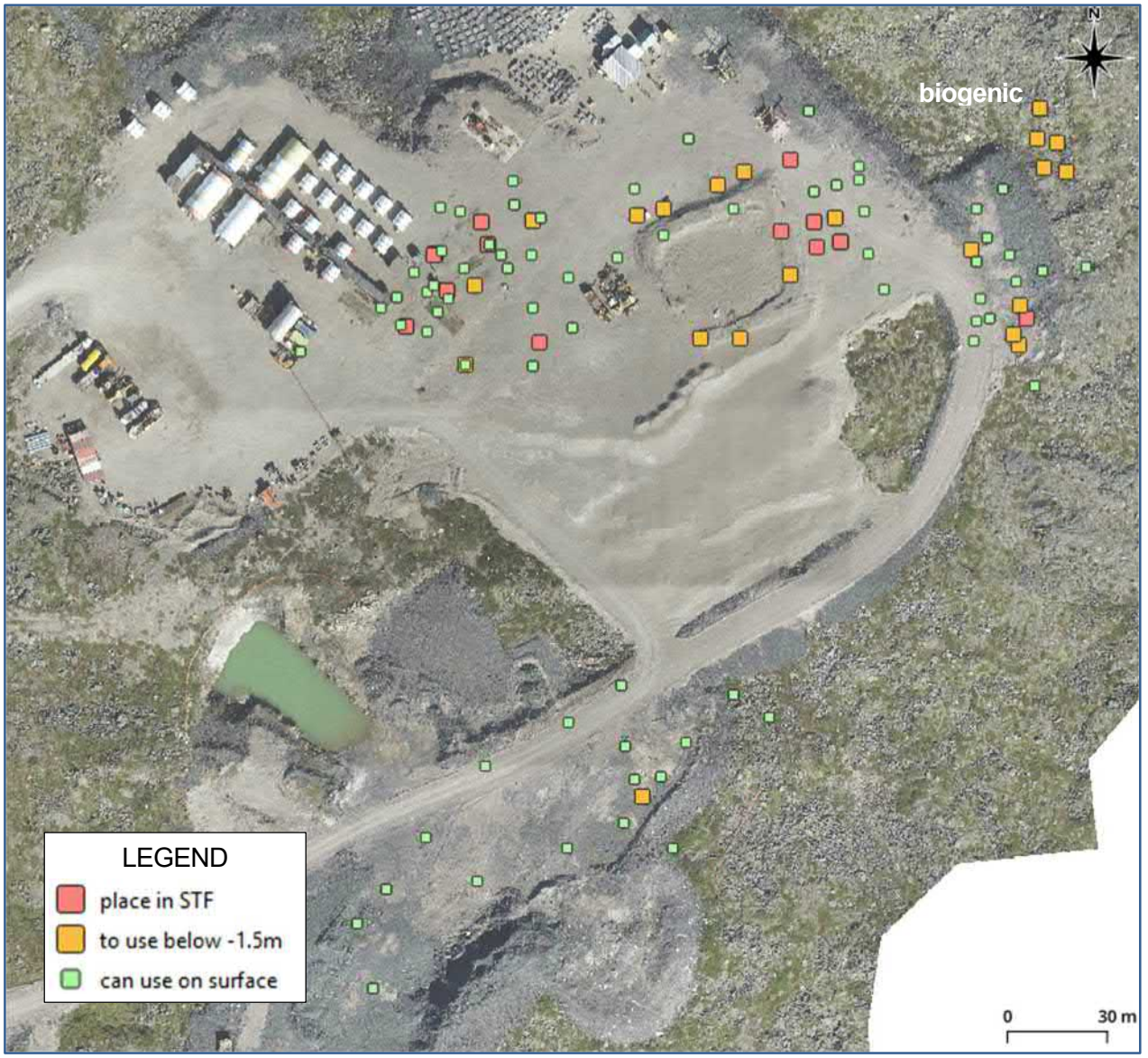
Figure 1: Aerating of stockpiles in the soil holding area August 2023.

Figure 2: Distribution of PHC contaminated soils as sampled 2019 – 2023; material in holding area used subsurface in 2024.



Non-Hazardous Landfill, Construction Report, Ulu Gold Project
Interim Report Draft

Prepared for

Blue Star Gold Corp.

Prepared by

SRK Consulting (Canada) Inc.
1CB041.000
September 2022

Non-Hazardous Landfill, Construction Report, Ulu Gold Project
Interim Report Draft

September 2022

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File Name: Ulu_Landfill_ConstructionReport_DRAFT_DG_20220916.docx

srk consulting

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Appendices

1 Introduction

1.1 General

The Ulu Gold project (the Project) is located on Inuit-owned land in the Kitikmeot Region, Nunavut, within the Hood River watershed. It is located 126 km north of the Lupin mine.

The mineral claims holding the Ulu deposit were initially staked in 1988. Portal excavation at the Ulu site commenced in 1996 to confirm resource calculations and mining design for mill feed to the Lupin Mine. Equipment to construct the camp and develop the mine was mobilized to site via a winter road from the Lupin mine in 1996. Camp 3 was built at the esker sand quarry to facilitate construction of the airstrip, road and underground exploration site. It included tent accommodations, a garage and a fuel tank farm. Camp 3 was reclaimed in 2018/2019. Underground development of the ramp ceased in August 1997 at the 155m level. The existing facilities at the Ulu underground exploration site consist of a 30-person camp with sleeping and dining quarters, a 22 m by 37 m vehicle repair shop, fuel containment areas (tanks removed in 2018) for bulk diesel and day tank storage, core storage area, core shack, and fuel staging area. The previous operator demolished unused facilities and stockpile piled them in preparation for disposal in the underground workings and in a landfill at the portal entrance. Blue Star intends to utilize a surface landfill that does not compromise the underground workings.

In support for renewal and amendment of the site water licence application submitted by Blue Star Gold Corporation (Blue Star), SRK Consulting (Canada) Inc. (SRK) was given the mandate to design a non-hazardous waste landfill facility (landfill) to contain non-hazardous wastes generated during ongoing remediation activities.

1.2 Report Objectives

The purpose of this as-built report is to provide a factual summary of the landfill activities to date, including timelines, construction materials, construction equipment, quality control and quality assurance activities, and deviations from design.

1.3 Design Overview

The landfill was designed to contain generally dry, non-leachate generating materials originating from the demolition of site infrastructure, progressive reclamation and closure activities. The landfilled waste will be covered by a 300 mm intermediate esker cover followed by a 300 mm final cover when complete.

A dry soil cover, esker sand, will be placed over the waste to create an isolation barrier to prevent wildlife contact during site inactivity periods (i.e. winter season or prolonged site shut-down). A minimum of 200 mm thick esker cover will be placed over the consolidated non-hazardous waste. The maximum slopes shall not exceed a grade of 4H:1V. Placement to be done in such a way as to minimise water accumulation on the facility.

See issue for construction drawings in Appendix C for additional detail.

1.4 Participants

The participants involved with the construction of the landfill are listed in Table 1-1. This list of companies is collectively referred to as the 'Project Team' throughout this report.

Table 1-1: Participants Involved in the Construction of Ulu Non-Hazardous Landfill

Role	Company
Client / Owner	Blue Star Gold Corp.
Design Engineer	SRK Consulting (Canada) Inc.
Site Construction QA	SRK Consulting (Canada) Inc. & Blue Star Gold Corp.
Equipment Decontamination & Cleaning	KBL Environmental Ltd.
Site Surveyor	Sub-Arctic Geomatics Ltd.
Construction Contractor and Earthworks QC	Ledcor Group

1.5 Main Tasks and Timeline

SRK provided construction quality assurance (QA) for the landfill and associated civil earthworks during construction. This included visits to complete the following inspections:

- Initial visit while staking of landfill footprint
- Foundation conditions prior to construction
- Equipment depollution (initial items)
- Mid-season visit to inspect ongoing waste placement
- End of field season prior to construction closeout

SRK did not provide full-time QA. SRK was on site between June 24 to 29, July 24 to 27 and September 2 to 5, 2021 (three QA visits in total). Items documented in this report that were completed outside of SRK's QA visits are based on communication with Blue Star and the QC activities completed by the Construction Contractor (Ledcor).

The main tasks involved with construction of the landfill included:

- Staking of the landfill footprint and survey control points;
- Foundation clearing and snow removal;
- Placement of esker for access into landfill footprint;
- Depolluting of equipment;
- Placement of waste within landfill footprint;
- Placement of esker sand to fill voids between waste;
- Cutting of large waste items for placement within landfill;
- Placement of interim cover;

A timeline of the main construction tasks is presented below in Table 1-2. The time periods shown are approximate.

Table 1-2: Landfill Construction Activities and Timeline

Activity	Period	SRK QA Presence
KBL Waste Depolluting	June 25 to 10, 2021	Partial
Staking of Landfill Footprint and Survey Markers	June 24 to 27, 2021	Yes
Staging Equipment	2020 field season and June 6 onwards	Partial
Preparing Access to Landfill Footprint	2020 field season and July 7 to July 18, 2021	Partial
Cutting of Waste	July 7 to July 30, 2021	Partial
Washing Waste Prior to Placement	July 17 to July 24, 2021	No
Placement of Waste	July 17 to Aug 21, 2021	Partial
Hauling And Stockpiling of Esker Sand	July 12 to Sep 20, 2021	No
Placement of Esker Sand Cover on Landfill	July 21 to Aug 26, 2021	No
Burn Clean Wood	July 30 to Aug 13, 2021	No
Pack Slopes and Touch-up Landfill	Sep 6 to Sep 15, 2021	No

As indicated in Table 1-2, there were some breaks in construction activities at the landfill due to equipment availability delays, and as equipment and personnel were at times reallocated to other projects on site.

1.6 Climatic Conditions

Temperature records were provided by Ledcor in the daily reports. During construction, the minimum recorded ambient air temperature was -4˚C on September 17 while the maximum was +26°C on July 21, 2021 with an average high of 11.8˚C and low of 2.9˚C.

Precipitation was not recorded during the construction period.

1.7 Photo Record

Photographs were taken each day during QA site visits by SRK. A summarized photo record showing the construction activities is provided in Appendix B. Table 1-3 outlines the contents of the photo record.

Photos related to material cleaning can be found in Appendix C.

Table 1-3: Contents of Photo Record

Title	Photo Record Page
Landfill Construction Overview	1
General Waste Placement	2
Landfill Pre-Construction	3
Landfill Construction	4 to 20

2 Construction Documentation

2.1 Construction Drawings

Table 2-1 lists details for the latest revision of each Issued for Construction (IFC) drawing. The complete set of construction drawings is provided in Appendix C.

Table 2-1: Ulu Non-Hazardous Landfill Issued for Construction Drawings

Drawing Number	Title	Latest Revision	Date of Issue
1	Landfill Plan	0	March, 2021
2	Landfill Sections	0	March, 2021

2.2 Daily Site Reporting

SRK had a Site Engineer present for three inspections during construction. Full-time QA was not provided by SRK; however, Blue Star and the Construction Contractor carried out QC checks and provided photos of construction progress throughout the construction. The Ledcor Project Engineer compiled a set of field photos and notes for each day of construction. These were done to summarize daily construction activities and provide specific details on factual observations used to track progress and inform decisions. The field notes were generally used to assist internal communication between the SRK Engineer, Blue Star and Ledcor. These correspondences are considered informal communications and are not presented as part of this report. The content of these messages however has been used when preparing this draft construction report and the corresponding as-built drawings.

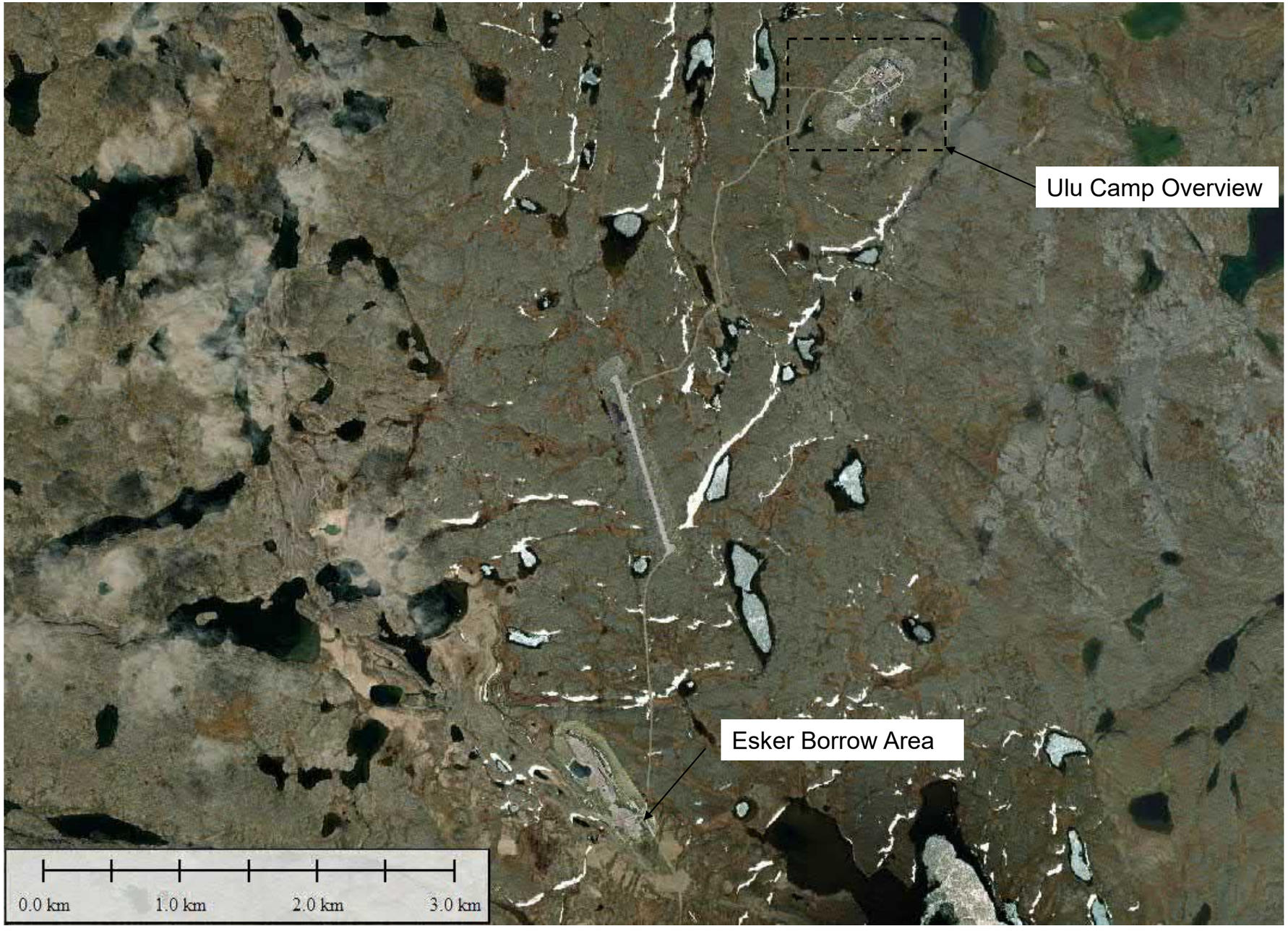
2.3 Construction Materials

2.3.1 Esker Sand

Esker sand was used during the construction of the landfill. The Esker material used as fill and cover is geochemically suitable, borrowed locally on-site from the esker borrow area illustrated in Figure 2-1. The material came from two sources, the borrow area located approximately 6 km south-west of Ulu camp and remediated esker sand stockpiled at Ulu Camp (SRK 2020a). Table 2-2 presents a summary of the materials used, as well as the location and the source of the material.

Table 2-2: Summary of Materials used in the Landfill Construction

Material	Location/Use
Esker Sand	Esker Borrow
Esker Sand	Ulu Camp
Esker Sand (Manage by Burial)	Ulu Camp



srk consulting	BLUE STAR GOLD CORP.	Non-Hazardous Landfill
		Ulu Overview
Job No: CAPR001821 Filename: Ulu_Camp3&Culvert6_Figures_DG.pptx	Ulu Gold Project	Date: September 2022 / Approved: DG / Figure: **2-1**

2.4 Summary of Material Quantities

The as-built material quantities used for the landfill construction are summarized in Table 2-3.

The as-built esker quantity is higher than the estimated neat-line design quantities. This can be attributed primarily to additional material intermittently placed within the waste voids as well as cover to mitigate waste being blown out of the landfill area due to high winds. The interim cover is also thicker than specified in areas with the intention to salvage esker prior to restarting landfilling the following season.

Table 2-3: As-Built vs Design Material Quantities

Material	Quantity (m^3)	
	As-Built	Design
Non-Hazardous Waste [1]	8,729	21,100
Esker Sand (Remediated)	304	1,125
Esker Sand (Interim Cover)	3,752	2,485
Rock or Coarse Esker (Final Cover) [2]	0	3,130

Note(s):

1. Waste volumes based on total volume calculated by Sub-Arctic August 25, 2021 excluding the esker material tally.
2. Investigation into the possible use of esker sand as final cover in progress at the time of writing this report.

3 Construction

3.1 Equipment

3.1.1 Mobile Equipment

Conventional earth moving equipment was used in construction of the non-hazardous landfill as listed in Table 3-1.

Table 3-1: Summary of Equipment used for Landfill Construction

Equipment Type	Manufacturer	Model	Attachments
Bulldozer	Caterpillar	D8	n/a
Excavator	Caterpillar	311	Thumb
Front End Loader	Caterpillar	966	n/a
Haul Truck X 2	Caterpillar	769C	n/a
Grader	Caterpillar	14G	n/a

A variety of other non-mobile equipment was also used to support the construction activities.

3.2 Survey Control

Survey control and reporting was performed by Sub-Arctic. Surveying was performed with Leica GS18 GPS equipment using the UTM zone 13 coordinate system and NAD83 datum. All survey data was processed on site by Sub-Arctic personnel. Interim as-built surveys were sent to SRK periodically to review construction progress. The survey data was used to check grades, minimum thicknesses, and waste placement extents for field decisions, as well as to prepare progressive volume checks. Typical accuracy of the system was within ±5cm.

3.3 Foundation Preparation

Foundation preparation involved clearing of remaining snow, removal of larger boulders and placement of esker sand to allow for access within the landfill footprint. SRK was not on site to observe the main clearing activities but was advised by Blue Star that all foundation clearing activities were completed.

3.4 Cleaning/Depolluting of Waste Material

As outline in KBL report, 21-129NT Ulu Mine Equipment Depolluting (KBL 2021), KBL personnel Jack Korycki (Heavy Duty Diesel Mechanic) and Gord Stewart (Waste Technician) completed the equipment depollution from June 25 to July 10, 2021. 21 of 24 identified pieces of equipment were depolluted, the remaining 4 were staged for depollution the following field season due to time constraints.

The depollution process was completed as follows:

- Identify and remove any remaining batteries or refrigerant;

- Identify tanks and lines containing hazardous material fluids in equipment;
- Gravity drained fluids into secondary containment (drain pans, berms and pails);
- Complete 2-3 phase flush process;
- Consolidate all removed fluids by type into larger containers such as pails, drums and totes; and
- Transport and dispose of consolidated material to KBL's Yellowknife transfer facility.

Table 3-2 Summary of Total Hazardous Material Removedsummarises the total amount of hazardous materials removed from all depolluted equipment.

Table 3-2: Summary of Total Hazardous Material Removed (KBL 2021)

Material	Unit	Value
Batteries	Units	4 incl. 4 lead battery connectors
Gas/Diesel	ℓ	1043.5
Antifreeze	ℓ	108
Engine Oil	ℓ	258
Hydraulic Oil	ℓ	685
Final Drive Oil	ℓ	165
Differential/Axle Oil	ℓ	115
Transmission Oil	ℓ	117
Power Steering Fluid	ℓ	0.5
Brake Fluid	ℓ	1

3.5 Cutting of Waste Material

Waste items which could not be crushed/compacted by the excavator and bulldozer as well as obscurely shaped items which would create voids within the landfill were identified and cut into more appropriate pieces to allow for efficient placement within the landfill. These items include large equipment/machinery, tanks, shipping containers etc. Cutting continued intermittently between July 7 and July 30, 2021.

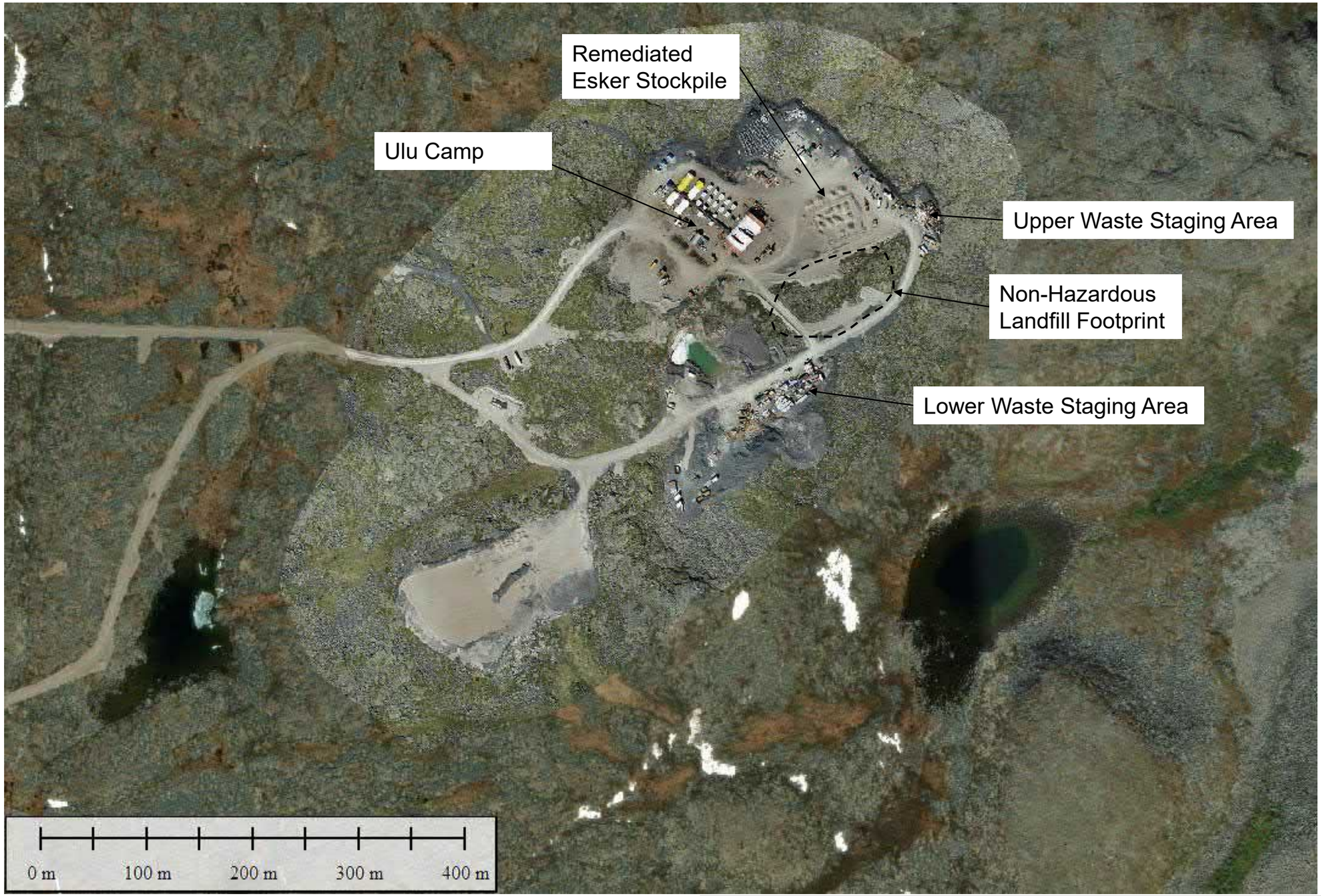
3.6 Placement of Waste Material

The waste material was consolidated and sorted in the upper and lower staging areas, see Figure 3-1. Staging included the consolidation of loose waste within available seacans and cut tanks for transport into the landfill area. Placement within the landfill was generally done by front end loader, excavator and pushed/pull but the bulldozer.

Each lift was compacted using the excavator and/or bulldozer tracks to minimize the void as much as reasonably possible. Where sufficient compaction could not be achieved, large voids between waste, the voids were filled with esker sand and recompacted.

During placement it was found that some waste items when compacted resulted in lighter debris being blown out of the landfill footprint during windy periods. To prevent the transport of waste debris out of the landfill footprint, the contractor placed a thin layer of esker over the waste to secure it in place. This was done continuously throughout the landfill operations/construction resulting in a higher esker demand than initially anticipated; see Section 2.4.

Waste placement and compaction was conducted as per the Landfill Management Plan (BS 2020).



srk consulting

Job No: CAPR001821
Filename: Ulu_Landfill_Figures_DG.pptx

BLUE STAR GOLD CORP.

Ulu Gold Project

Non-Hazardous Landfill

Ulu Camp Overview

Date:	Approved:	Figure:
September 2022	DG	**3-1**

3.7 Placement of Cover Material

Esker material was hauled to the landfill, placed within the landfill footprint and dozed over the waste material. The load and haul was completed using the CAT 966 Front End Loader and CAT 969 Dup Trucks. Esker material was placed and allowed to fill the voids within the waste material to prevent future percolation of the cover material into the voids. Compaction was achieved using the bulldozer tracks and roller.

The interim cover thickness covered all waste material with varied depth across the facility. There is a minimum thickness of 0.2m and a maximum of in excess of 1m in places; this due to the interim closure resulting in irregular waste surface.

4 Deviation from Design

4.1 Cover Slope

The interim closure design criteria indicate the slope angles may not exceed 4H:1V. Majority of the landfill cover satisfies this criterion, however, consolidated waste in seacans and cut up tanks formed an ~2m step along the northern edge which was filled with esker material to a slope angle of ~1H:1.5V.

At this stage of design the landfill is not yet complete and, therefore, the deviation from design can be managed until such time the landfill construction is completed. It is recommended the client inspect the slopes which do not meet the criteria and repair any erosion which may have occurred during the project closure period.

5 Quality Assurance and Quality Control

5.1 General

SRK was responsible for the QA while Ledcor (Construction Contractor) and Blue Star assumed responsibly for QC of berm fill materials.

5.2 Equipment Depolluting

QC was completed by both KBL and Blue Star during the depolluting process. Once the hazardous material was removed from the equipment and all phases of flushing complete, KBL personnel reviewed the equipment checklist and procedure with the Blue Star site representative. Blue star then inspected and signed off on each piece of equipment when depollution was considered complete; for more details see Appendix D.

There were some checklists not signed by the Blue Star representative, in this case the checklists were review in conjunction with photo records.

6 Remaining Works

The landfill was not completed during the 2021 field season. The following must be noted for the continued construction of the landfill:

- Depolluting of the remaining equipment allocated for disposal within the landfill must be completed prior to placement within the landfill.
- The interim cover is intended as a wildlife barrier between summer field seasons in the event the landfill was not completed in a single season. The current cover will not suffice as a medium- or long-term cover and should Blue Star plan to extend the duration prior to completing the landfill, it is recommended a more appropriate cover is placed.
- Ongoing monitoring and visual inspections of the landfill should be completed on site as per the Landfill Management Plan (BS 2020).

This report, Non-Hazardous Landfill, Construction Report, Ulu Gold Project Interim Report Draft, was prepared by SRK Consulting (Canada) Inc.

DRAFT

Darryl Godley, EIT, BSc
Senior Consultant

All data used as source material plus the text, tables, figures, and attachments of this document have been reviewed and prepared in accordance with generally accepted professional engineering and environmental practices.

7 References

SRK Consulting (Canada) Inc., (2020a). Petroleum Hydrocarbon Soil Remediation Criteria for Progressive Reclamation of the Ulu Gold Project Memorandum, Ulu Gold Project. Memo prepared for Blue Star Gold Corp., June 202.

KBL Environmental Ltd. (2021). 21-129NT Ulu Mine Equipment Depolluting Report. Prepared for Blue Star Gold Corp. November 19, 2021.

Blue Star Gold Corp. (2020). Landfill Management Plan, Ulu Gold project. March, 2020.

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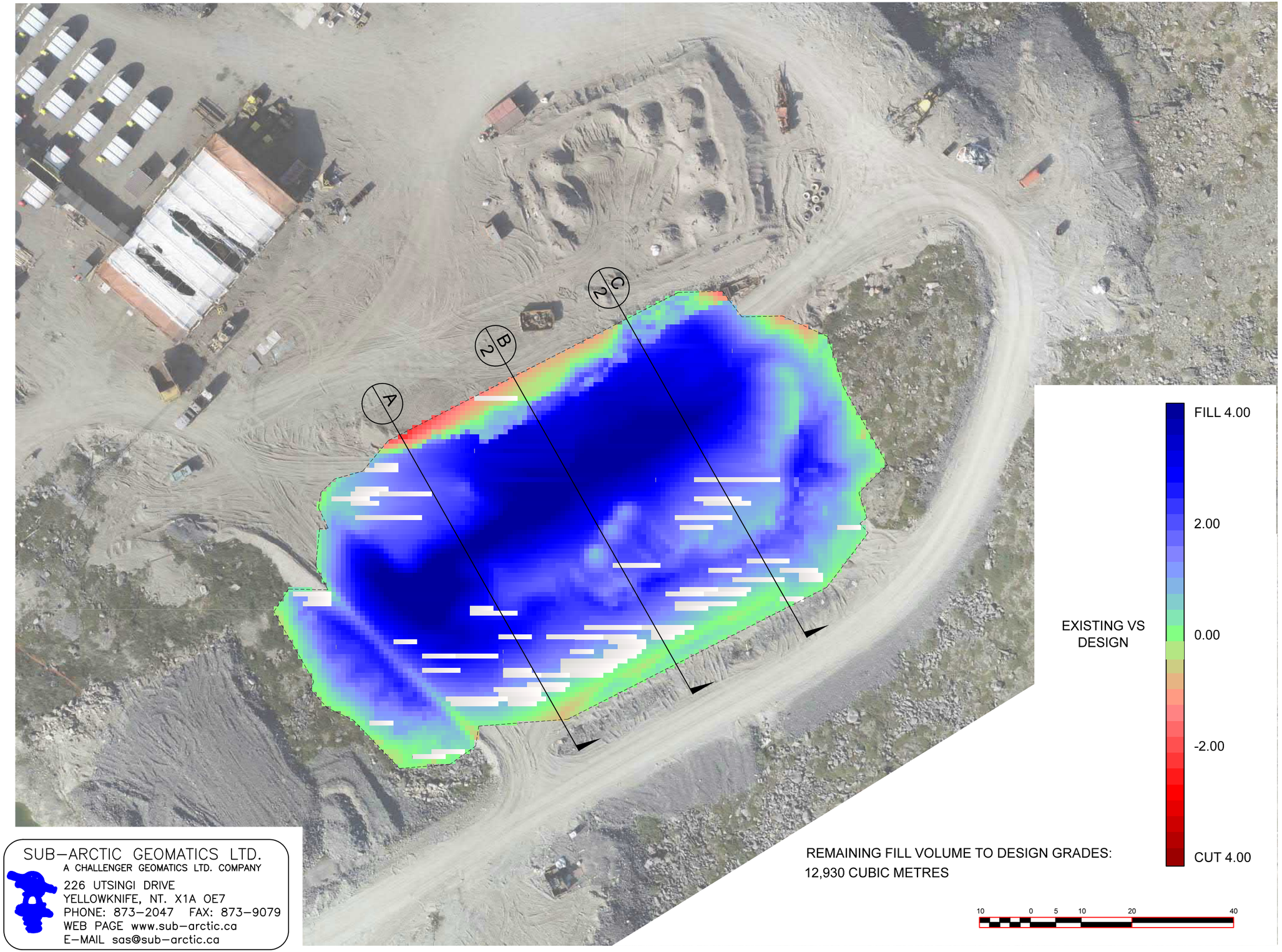
Appendix A – Progress Survey



NOTES:

DATE OF UAV FLIGHT: AUG 14, 2021

ALL DISTANCES ARE EXPRESSED IN METRES OR DECIMALS THEREOF.

NO.	REVISION\ISSUE	DATE:

DRAWN BY: MD

CHECKED BY: MD

BLUE STAR GOLD

PROGRESS TRACKING OF LANDFILL AREA

ULU MINE – N.U.

PROJECT NO.: 80694
FILE NO.:
80694–PROGRESS 4.dwg

DATE: AUGUST 25, 2021

SCALE: AS SHOWN | SHEET 1 OF 2

SUB–ARCTIC GEOMATICS LTD.
A CHALLENGER GEOMATICS LTD. COMPANY
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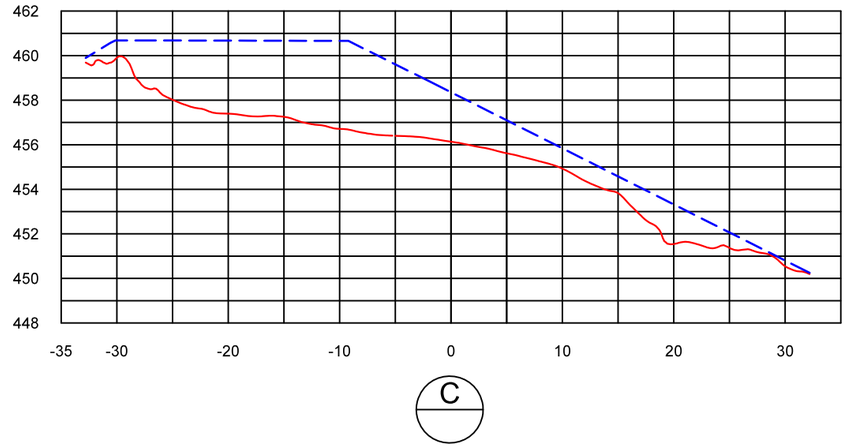

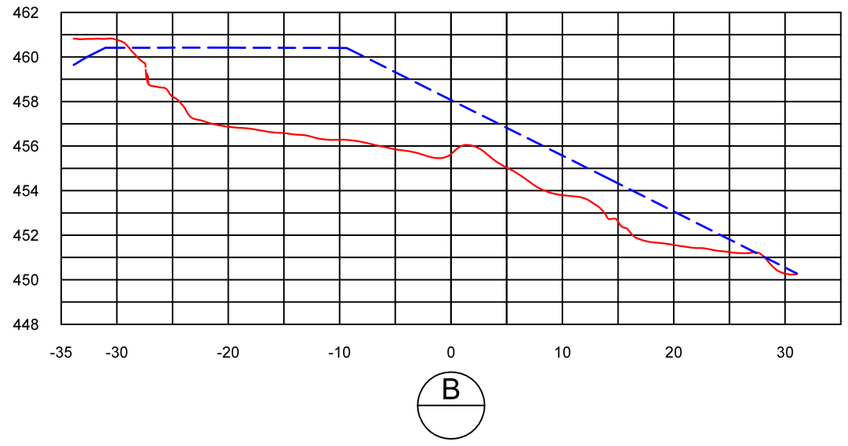

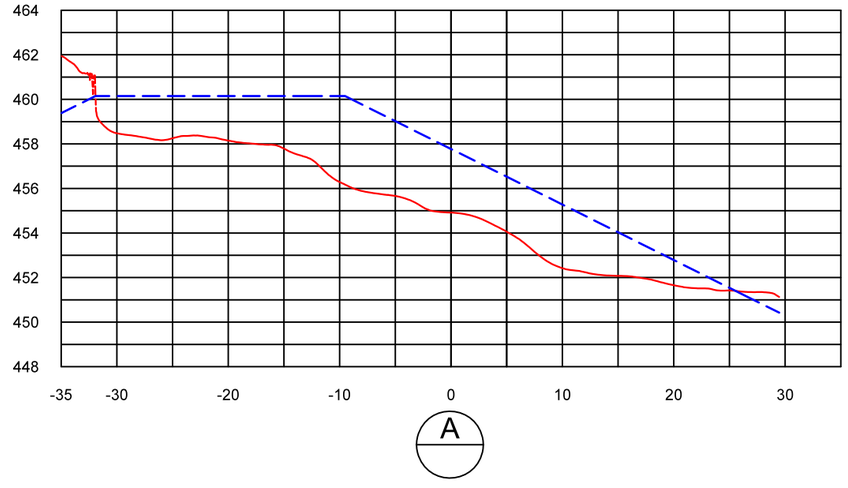

LEGEND

DESIGN

EXISTING

NOTES:

DATE OF UAV FLIGHT: AUG 14, 2021

ALL DISTANCES ARE EXPRESSED IN METRES OR DECIMALS THEREOF.

NO.	REVISION\ISSUE	DATE:

DRAWN BY: MD

CHECKED BY: MD

BLUE STAR GOLD

PROGRESS TRACKING OF LANDFILL AREA

ULU MINE – N.U.

PROJECT NO.: 80694
FILE NO.:
80694–PROGRESS 4.dwg

DATE: AUGUST 25, 2021

SCALE: AS SHOWN | SHEET 2 OF 2

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Appendix B – Construction Photo Record

The beginning of the 2021 field season

The end of the 2021 field season

srk consulting	BLUE STAR GOLD CORP.	Non-Hazardous Landfill
		Landfill Construction Overview
Job No: 1CB041.000 **Filename:** AppendixC_Ulu_Landfill_Photolog_Rev2_DG.ppt	Ulu Gold Project	Date: September 2022 / Approved: DG / Figure: **1**

N

W E

S

1	Container, tanks and miscellaneous waste including steel and tyres.
2	Steel sheeting, pipes and deconstructed tanks
3	Tyres and miscellaneous waste
4	Deconstructed bunk housing and miscellaneous waste
5	Cleaned and cut equipment (surface and underground) and generators
6	Concrete

srk consulting

BLUE STAR GOLD CORP.

Non-Hazardous Landfill

General Waste Placement

Job No: 1CB041.000

Filename: AppendixC_Ulu_Landfill_Photolog_Rev2_DG.ppt

Ulu Gold Project

Date:	Approved:	Figure:
September 2022	DG	2

An aerial view of the site on June 24, 2021

The west side of the site facing east as of June 24, 2021

The east side of the site facing west as of June 25, 2021

An aerial view of the site on June 26, 2021

srk consulting	BLUE STAR GOLD CORP.	Non-Hazardous Landfill
		Landfill Pre-Construction
Job No: 1CB041.000 Filename: AppendixC_Ulu_Landfill_Photolog_Rev2_DG.ppt	Ulu Gold Project	Date: September 2022 / Approved: DG / Figure: **3**

The south side of the site facing north on July 7, 2021

Equipment placement prior to cutting on July 7, 2021

A new access road under construction on July 7, 2021

srk consulting	BLUE STAR GOLD CORP.	Non-Hazardous Landfill
		Landfill Construction
Job No: 1CB041.000 Filename: AppendixC_Ulu_Landfill_Photolog_Rev2_DG.ppt	Ulu Gold Project	Date: September 2022 / Approved: DG / Figure: **4**

Esker sand used for access and foundation leveling on July 15, 2021

Transporting esker sand on July 18, 2021

Debris placement and esker cover on July 16, 2021

srk consulting	BLUE STAR GOLD CORP.	Non-Hazardous Landfill
		Landfill Construction
Job No: 1CB041.000 Filename: AppendixC_Ulu_Landfill_Photolog_Rev2_DG.ppt	Ulu Gold Project	Date: September 2022 / Approved: DG / Figure: **5**

Disassembly of Bunkhouses on July 19, 2021

Continued bunkhouse placement and disassembly on July 19, 2021

The south side of the site facing north on July 19, 2021

srk consulting	BLUE STAR GOLD CORP.	Non-Hazardous Landfill
		Landfill Construction
Job No: 1CB041.000 Filename: AppendixC_Ulu_Landfill_Photolog_Rev2_DG.ppt	Ulu Gold Project	Date: September 2022 / Approved: DG / Figure: **6**

Fuel truck placement in the landfill on July 20, 2021

Esker sand placed over bunkhouses on July 21, 2021

Fuel truck dismantling progress as of July 22, 2021

Esker sand placed over bunkhouses on July 21, 2021

srk consulting	BLUE STAR GOLD CORP.	Non-Hazardous Landfill
		Landfill Construction
Job No: 1CB041.000 Filename: AppendixC_Ulu_Landfill_Photolog_Rev2_DG.ppt	Ulu Gold Project	Date: September 2022 / Approved: DG / Figure: **7**

Steel waste placed in the landfill. July 20, 2021

Bulldozer placing steel in the landfill. July 22, 2021

Underground mine equipment placed in the landfill. July 20, 2021

A generator placed in the landfill. July 21, 2021

srk consulting	BLUE STAR GOLD CORP.	Non-Hazardous Landfill
		Landfill Construction
Job No: 1CB041.000 Filename: AppendixC_Ulu_Landfill_Photolog_Rev2_DG.ppt	Ulu Gold Project	Date: September 2022 / Approved: DG / Figure: **8**

The south side of the site facing north – staging shipping containers on July 23, 2021

Underground equipment placement. July 23, 2021

Surface haul truck placed. July 24, 2021

The north side of the site facing southwest on July 23, 2021

srk consulting	BLUE STAR GOLD CORP.	Non-Hazardous Landfill
		Landfill Construction
Job No: 1CB041.000 Filename: AppendixC_Ulu_Landfill_Photolog_Rev2_DG.ppt	Ulu Gold Project	Date: September 2022 / Approved: DG / Figure: **9**

Seacan filled with waste on July 23, 2021

Tanks filled with waste. July 24, 2021

Seacan filled and compacted in landfill on July 24, 2021

Shipping containers placed. July 25, 2021

srk consulting	BLUE STAR GOLD CORP.	Non-Hazardous Landfill
		Landfill Construction
Job No: 1CB041.000 Filename: AppendixC_Ulu_Landfill_Photolog_Rev2_DG.ppt	Ulu Gold Project	Date: September 2022 / Approved: DG / Figure: **10**

Tanks filled with waste were placed next to trucks. July 25, 2021

Tanks filled with waste were placed next to trucks. July 25, 2021

Clean tanks were staged in the landfill for cutting. July 25, 2021

Tanks filled with waste were staged. July 25, 2021

srk consulting	BLUE STAR GOLD CORP.	Non-Hazardous Landfill
		Landfill Construction
Job No: 1CB041.000 Filename: AppendixC_Ulu_Landfill_Photolog_Rev2_DG.ppt	Ulu Gold Project	Date: September 2022 / Approved: DG / Figure: **11**

Progress overview on July 27, 2021

srk consulting	BLUE STAR GOLD CORP.	Non-Hazardous Landfill
		Landfill Construction
Job No: 1CB041.000 Filename: AppendixC_Ulu_Landfill_Photolog_Rev2_DG.ppt	Ulu Gold Project	Date: September 2022 / Approved: DG / Figure: **12**

Waste placement and compaction on August 2, 2021

The east side of the site facing west, esker placement within voids and wind cover on August 3, 2021

The east side of the site facing west on August 3, 2021

The north side of the site facing south on August 2, 2021

srk consulting	BLUE STAR GOLD CORP.	Non-Hazardous Landfill
		Landfill Construction
Job No: 1CB041.000 Filename: AppendixC_Ulu_Landfill_Photolog_Rev2_DG.ppt	Ulu Gold Project	Date: September 2022 / Approved: DG / Figure: **13**

The south side of the site facing north on August 3, 2021

Unloading esker sand on August 3, 2021

The northeast side of the site facing southwest on August 3, 2021

Loading waste in tanks on August 3, 2021

srk consulting	BLUE STAR GOLD CORP.	Non-Hazardous Landfill
		Landfill Construction
Job No: 1CB041.000 Filename: AppendixC_Ulu_Landfill_Photolog_Rev2_DG.ppt	Ulu Gold Project	Date: September 2022 / Approved: DG / Figure: **14**

The west side of the site facing east with material placement on August 7, 2021

The west side of the site facing east on August 9, 2021

Burning of clean wood on August 9, 2021

Placing esker sand on August 9, 2021

srk consulting	BLUE STAR GOLD CORP.	Non-Hazardous Landfill		
		Landfill Construction		
Job No: 1CB041.000 Filename: AppendixC_Ulu_Landfill_Photolog_Rev2_DG.ppt	Ulu Gold Project	Date: September 2022	Approved: DG	Figure: **15**

Steel in the shipping containers on August 16, 2021

The northwest side of the site facing southeast on August 10, 2021

The north side of the site facing south with esker void fill and cover on August 9, 2021

Tires in the shipping containers. August 10, 2021

srk consulting	BLUE STAR GOLD CORP.	Non-Hazardous Landfill
		Landfill Construction
Job No: 1CB041.000 Filename: AppendixC_Ulu_Landfill_Photolog_Rev2_DG.ppt	Ulu Gold Project	Date: September 2022 / Approved: DG / Figure: **16**

The south side of the site facing north on August 12, 2021

The south side of the site facing north on August 12, 2021

The east side of the site facing west on August 12, 2021

srk consulting	BLUE STAR GOLD CORP.	Non-Hazardous Landfill
		Landfill Construction
Job No: 1CB041.000 Filename: AppendixC_Ulu_Landfill_Photolog_Rev2_DG.ppt	Ulu Gold Project	Date: September 2022 / Approved: DG / Figure: **17**

The south side of the site facing north. August 12, 2021

Esker sand placed over waste. August 10, 2021

Concrete block placement on August 12, 2021

Esker sand placed over waste. August 13, 2021

srk consulting	BLUE STAR GOLD CORP.	Non-Hazardous Landfill
		Landfill Construction
Job No: 1CB041.000 Filename: AppendixC_Ulu_Landfill_Photolog_Rev2_DG.ppt	Ulu Gold Project	Date: September 2022 / Approved: DG / Figure: **18**

Steel in the shipping containers. August 16, 2021

Esker sand cover. August 16, 2021

The north side facing south on August 16, 2021

srk consulting	BLUE STAR GOLD CORP.	Non-Hazardous Landfill
		Landfill Construction
Job No: 1CB041.000 Filename: AppendixC_Ulu_Landfill_Photolog_Rev2_DG.ppt	Ulu Gold Project	Date: September 2022 / Approved: DG / Figure: **19**

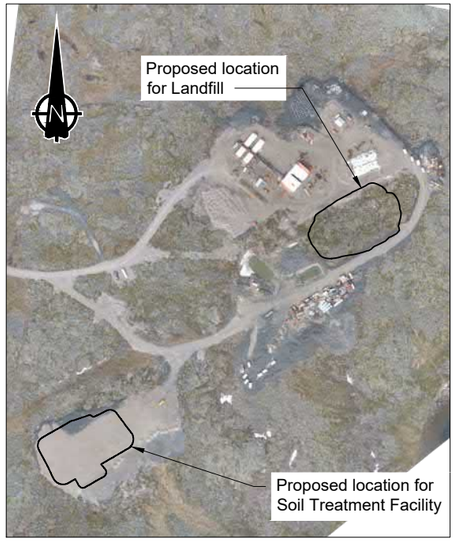
The south side of the site facing north on August 19, 2021

The north side of the site facing southwest with interim cover compaction on August 19, 2021

The north side of the site facing southeast with interim cover compaction on August 19, 2021

srk consulting	BLUE STAR GOLD CORP.	Non-Hazardous Landfill
		Landfill Construction
Job No: 1CB041.000 Filename: AppendixC_Ulu_Landfill_Photolog_Rev2_DG.ppt	Ulu Gold Project	Date: September 2022 / Approved: DG / Figure: **20**

Appendix C – Issued for Construction Drawings



Key Plan

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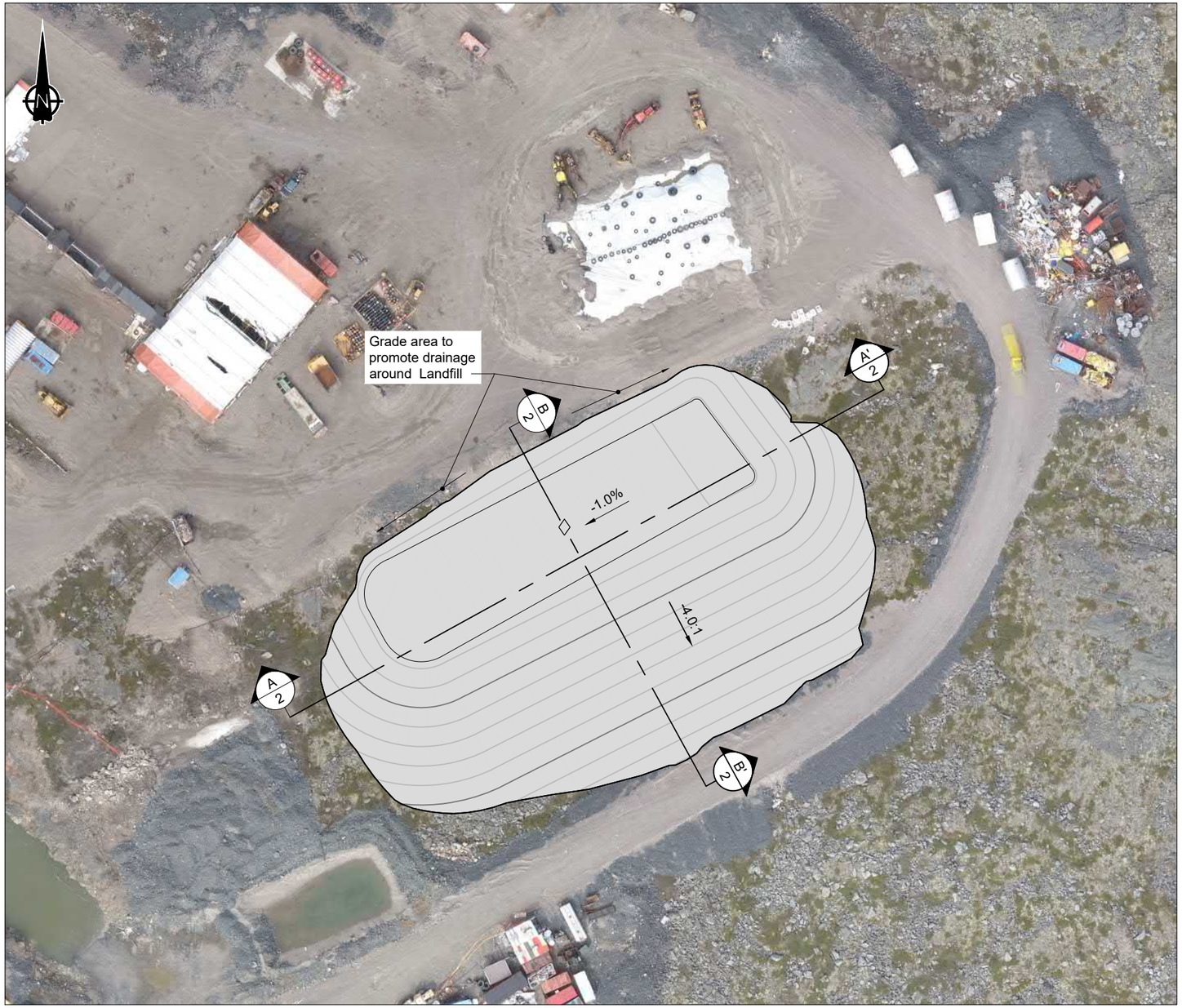


Landfill - Plan

0m 10 20 30 40

LEGEND

Design Infrastructure

NOTES

1. Contours shown at 1.0m intervals.
2. All dimensions are in meters unless otherwise noted.
3. Limits of existing roadway surfaces are approximate.
4. Final Cover volume estimate based on 350mm cover to accommodate possible oversize material.
5. All construction material to be approved by the Design Engineer.
6. All construction to be completed in accordance with the technical specifications in the design memorandum (Ulu Gold Project Non-Hazardos Waste Landfill Design. March 2020. Project No. 1CB041.000).

REFERENCE

1. Coordinate System is WGS84 UTM Zone 12N.
2. Original ground surface is created from historic data conturs in drawing ULUTOPO.DWG.
3. Background Image from drone survey completed 07/17/2019.

Landfill Volumes	
Material	**Volume m^3**
General Waste	20,100
Interim Cover	2485
Final Cover	3130

(See Note 5)

DRAFT
NOT FOR CONSTRUCTION

srk consulting

BLUE STAR GOLD CORP.

Ulu Gold Project

Landfill
Plan

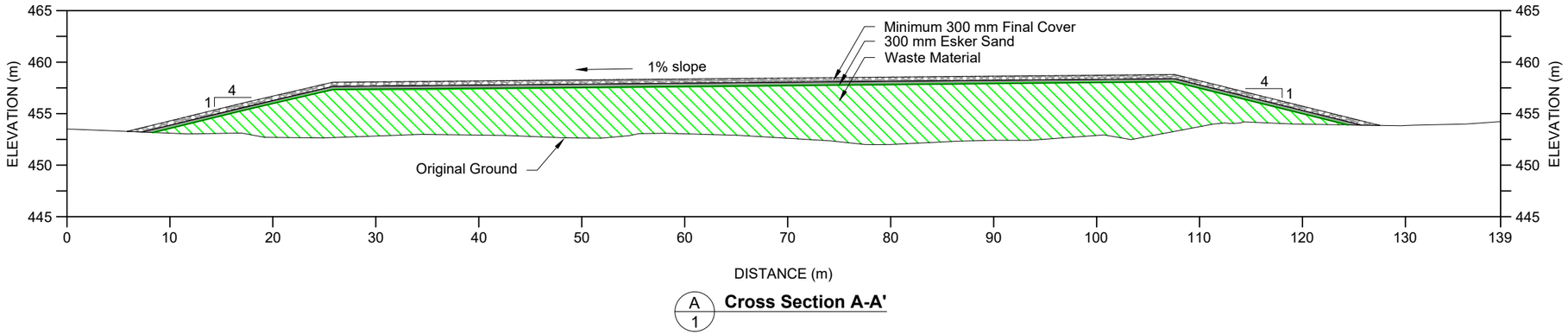
SRK JOB NO.: 1CB041.000

FILE NAME: 1CB041.000 Contaminated Landfill.dwg

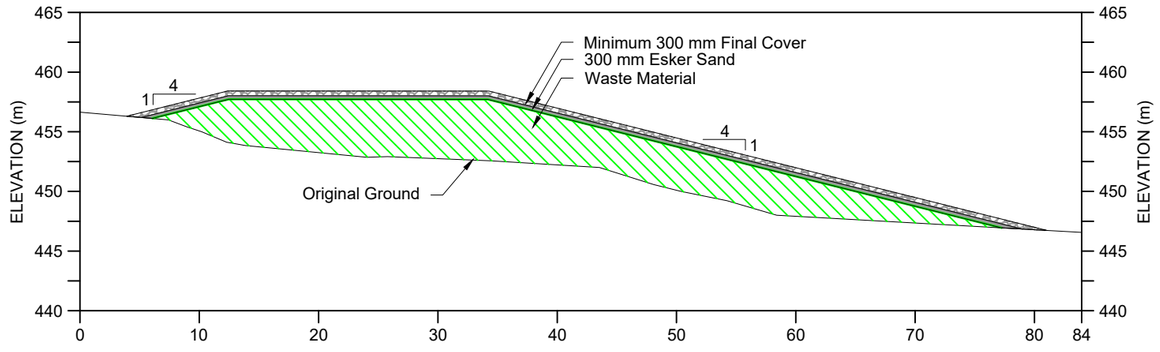
Blue Star Gold Corp.

DATE: March 2020 | APPROVED: | FIGURE: 1

P:\01_SITES\Ulu\1040_AutoCAD\1CB041.000_Landfill_Design\1CB041.000 Contaminated Landfill.dwg



A/1 **Cross Section A-A'**



B/1 **Cross Section B-B'**

LEGEND

- Waste Material
- Esker Sand
- Final Cover

NOTES

1. All dimensions are in meters unless otherwise noted.
2. All construction to be completed in accordance with the technical specifications in the design memorandum (Ulu Gold Project Non-Hazardous Waste Landfill Design. March 2020. Project No. 1CB041.000).

REFERENCE

1. Coordinate System is WGS84 UTM Zone 12N.
2. Original ground surface is created from historic data conturs in drawing ULUTOPO.DWG.

DRAFT
NOT FOR CONSTRUCTION

0m 5 10 15 20

srk consulting

SRK JOB NO.: 1CB041.000
FILE NAME: 1CB041.000 Contaminated Landfill.dwg

BLUE STAR GOLD CORP.

Blue Star Gold Corp.

Ulu Gold Project

Landfill
Sections

DATE:	APPROVED:	FIGURE:
March 2020		2

P:\01_SITES\Ulu\040_AutoCAD\1CB041.000_Landfill_Design\1CB041.000 Contaminated Landfill.dwg

Appendix D – KBL Environmental Ulu Mine Equipment Depolluting

November 19, 2021

Blue Star Gold Corp.
507-700 W/ Pender St.
Vancouver V6C 1G8

Attention: Sharleen Hamm, Consulting Project Manager, Blue Star Gold Corp.

21-129NT Ulu Mine Equipment Depolutting

Blue Star Ulu Gold Project – Equipment

Dear Ms. Hamm;

Blue Star Gold Corp. (Blue Star) commissioned KBL Environmental Ltd. (KBL) to depollute various pieces of equipment at the Ulu Gold Project located approximately 200 km southeast of Kugluktuk, Nunavut (the "Site"). The following letter report outlines the work completed by KBL.

1.0 Scope of Work

The objective of the work was to depollute heavy equipment that remained on the Site. KBL completed the following scope of work:

- Identify and verify existing heavy equipment on site with list provided by Blue Star
- Removing batteries, refrigerants and any fluids remaining in equipment
- Flushing all drained lines to remove any residual hazardous materials
- Removing hydraulic cylinders and hoses from equipment where necessary
- Documenting all pieces of equipment identified, inspected, drained and flushed through a systematic approach including keeping a detailed photographic record, note taking and completing an equipment checklist

Blue Star provided KBL with an equipment list. Variances to the list were communicated with Blue Star and are discussed below.

2.0 Regulatory Framework

The Nunavut "End-of-Life Vehicle Hazardous Materials Recovery Program Manual" was referenced for the proper removal, storage, and handling of potentially hazardous materials from end-of-life vehicles. Section 3.4.2 of the manual states that all hazardous fluids must be removed from end-of-life vehicles before safe storage or crushing. As well, to ensure the safe removal of all hazardous items, the battery should be removed first, followed by refrigerants and thirdly fuel. The order of removal thereafter is not significant. Hazardous items must be removed if present include: Battery, Refigerants, Gasoline or Diesel Fuel, Antifreeze/Coolant, Brake Fluid, Engine Oil, Transmission Fluid, Power Steering Fluid, Differentail Fluid, Windshield Washer Fluid, Ballasts and

capacitors, Mercury Switches and lead. (Dillon, 2011). KBL's equipment checklist was derived from the procedures outlined in the manual.

3.0 Site Methodology

KBL personnel Jack Korycki (Heavy Duty Diesel Mechanic) and Gord Stewart (Waste Technician) completed the equipment depollution from June 25 to July 10, 2021. Liam West (Environmental Technologist) was the Blue Star site representative during this time. KBL identified the following equipment during the execution of the scope of work (Table 1):

- 25 pieces of equipment that required depolluting
  - 21 were depolluted
  - Four require depollution. Accessibility and time issues prevented depollution in 2021.
- Four pieces of equipment could not be found that were listed on Blue Star list
  - 1980 Ford Flat deck
  - Wagner MT-426
  - Wagner ST-7.5Z Scooptram
  - Cat 930 Front End Loader
- One Transformer was identified on-site that was not on the Bluestar equipment list.

The depollution process was completed as follows:

- Identify and remove any remaining batteries or refrigerant
- Identify tanks and lines containing hazardous material fluids in equipment
- Gravity drained fluids into secondary containment (drain pans, berms and pails)
- Complete 2-3 phase flush process
- Consolidate all removed fluids by type into larger containers such as pails, drums and totes
- Transport and dispose of consolidated material to KBL's Yellowknife transfer facility

The majority of the equipment had batteries previously removed, KBL removed any remaining batteries and stored them in a $1m^3$ poly bin onsite. No refrigerants were encountered within the equipment. The equipment was then drained of any remaining hazardous material fluids, some equipment was stripped to gain access to tanks and lines for fluid removal. Fluids were drained into secondary containment and consolidated into larger containers by fluid type (gas/diesel, antifreeze, engine oil, hydraulic oil, final drive oil, differential/axel oil, transmission oil, power steering fluid and brake fluid).

KBL's flushing process was as follows: the first flush was a hydrocarbon (diesel) solution added and gravity drained; this loosened and broke down any remaining oils/fluids in the system. Second, a degreaser solution was added to the tanks, left overnight and gravity drained in the morning. Lastly a water flush was complete after the degreaser was removed. All flush solutions were consolidated into larger containers for disposal. For the cooling systems, a 2-phase flush was conducted, degreaser and water flush only, unless oil was observed in the system, than a hydrocarbon flush was also completed. Flushing fluids were visually monitored for each system

for discoloration to ensure flushes were cleaning the systems thoroughly. All units were re-sealed to alleviate any residuals leaking.

Photos were taken of each piece of equipment and of the equipment and depolluting process. Additionally, some equipment had videos taken of the depolluting and flushing process. All photos and videos were organized by KBL unit #, other areas photographed are identified by area or type. All photos were organized and shared to Blue Star in its Ulu Reclamation/Equipment Processing_Decommissioning sharepoint folder on September 8, 2021

The total amount of hazardous materials removed from all depolluted equipment was:

- Four batteries, Four lead battery connectors
- Gas/diesel – 1043.5 L
- Antifreeze – 108 L
- Engine Oil – 258 L
- Hydraulic Oil – 685 L
- Final Drive Oil – 165 L
- Differential/Axle Oil – 115 L
- Transmission Oil – 117 L
- Power Steering Fluid – 500 ml
- Brake Fluid – 1 L

Once the hazardous material was removed from the equipment and all phases of flushing complete, KBL personnel reviewed the equipment checklist and procedure with the Blue Star site representative. It was then intended for Blue star to sign off on each piece of equipment when depollution was considered complete. Due to timing of completion of processing on select equipment and shift change, a few checklists are missing Blue Star sign off from field designate however pieces we're documented, photographed and discussed which has been catalogued and shared with Blue Star for future reference as required. The consolidated materials (drained fluids and flush solutions) were transported to KBL's Yellowknife Transfer Facility for proper disposal.

4.0 Conclusions & Recommendations

From June 25 to July 10, 2021, 21 pieces of equipment were depolluted of all hazardous materials, 4 pieces of equipment were identified as incomplete, and 4 pieces of equipment could not be found on site. The 4 incomplete pieces of equipment were Wagner MT-444, the Tamrock HS205M Drill, the Atlas Copco Rocket 322s Drill and the Wagner ST-2D Scooptram. This equipment could not be depolluted due to the inaccessibility of equipment and KBL reaching Blue Star's allotted hours/budget for the project. The equipment that KBL was unable to find was the 1980 Ford Flat Deck, the Wagner MT-426, the Wagner ST-7.5Z Scooptram and the Cat 930 Front End Loader, refer to completed equipment checklists. While on-site, KBL found a Moloney Electric Transformer that was not previously identified, KBL drained all remaining fluids within the transformer (approximately 60L) and flushing was not complete due to unknown PCB content. A sample was taken for PCB analysis and the analytical results were 38 µg/g or ppm; therefore the

transformer oil contains PCB's. The laboratory certificate of analysis is enclosed at the end of this report.

KBL recommends returning to the site to complete the depollution of the four remaining pieces of equipment (KBL unit # 11, 21, 22, and 24). Additionally, debris will need to be removed around the Wagner MT-444 to access all parts for the equipment to be completed depolluted. Lastly, KBL was unable to identify four pieces of equipment on the property. In the event this equipment is located, KBL recommends the equipment be properly depolluted prior to disposal.

All depolluted equipment was verified and signed off by Blue Star and is ready for final disposal, excluding the identified transformer. KBL recommends next step is to complete a swab sample on the transformer carcass to understand PCB impacts and pending results will determine the next step of preparing the carcass for onsite disposal.

If you have any questions, please do not hesitate to contact the undersigned.

Regards,

Melanie Dallow
Senior Environmental Technologist

Jeff Bembridge
General Manager, Operations

Enclosed

Table: Equipment and Fluids Removed Summary

Certificate of Analysis: PCB SamplingAttachment 1: KBL Equipment Checklist

References:

Government of Nunavut (GN). 2011. End-of-Life Vehicle Hazardous Materials Recovery Manual. *Manual for the Preparation and Disposal of End-of-Life Vehicles in Nunavut*. Department of Environment, prepared by Dillon Consulting Limited.

TABLES

	Equipment Fluid Capacity							Fluids Removed and Flushed (F)										Notes
KBL #	Equipment List	Fuel (L)	Oil (L)	Hydraulic (L)	Batteries	Filters	Glycol (L)	Gas/Diesel (L)	Antifreeze (L)	Engine Oil (L)	Hydraulic Oil (L)	Final Drive Oil (L)	Axel Oil (L)	Transmission Oil (L)	Power Steering Fluid (ml)	Brake Fluid (ml)	Transformer Oil (L)	
1	Ford 800 Boom Truck	117.3	181		1	6	30	120 &F	10 &F	25 &F	60 &F	10 &F	2 &F	2 &F	500 &F	500 &F	-	1 battery removed, 12 hoses on picker removed, air tank flushed
2	Mack Fuel Truck	120	20	20	2	4	20	F	15 &F	F	-	-	3 &F	F	-	-	-	
3	Cat Water Truck	120	20	20	2	3	20	-	F	F	40 &F	-	20 &F	10 &F	-	-	-	10L removed and flushed from air tank (oily water)
4	Wagner ST-3.5 Scooptram	216	170		2			200	10	15 &F	160 &F	40 &F	30 &F	60 &F	-	-	-	3 batteries removed, 4 hydraulic hoses removed
5	Generator 600KW Cat		109.6	122	1	2	164	1	10 &F	30 &F	-	-	-	-	-	-	-	
6	Generator 600KW Cat		109.6	122	1	2	164	0.5 &F	10 &F	45 &F	-	-	-	-	-	-	-	2 hoses removed
7	Generator 250KW Detroit		50	60	1	2	90	-	3 &F	5 &F	-	-	-	-	-	-	-	2 hoses removed
8	Compressor 600 CFM	80	9	45			25	-	F	F	-	-	-	-	-	-	-	4 hoses removed. Equipment empty, preformed flush only.
9	Generator 500KW Cummings		80	80	1	2	90	-	20 &F	60 &F	-	-	-	-	-	-	-	2 lead battery connectors removed- battery already removed and fuel tank empty
10	Generator 500KW Cummings		80	80	1	2	90	-	10 &F	10 &F	-	-	-	-	-	-	-	2 lead battery connectors removed- battery already removed and fuel tank empty
12	Cat 824C Bulldozer	700	34	88	2	6	62	2	F	3 &F	25 &F	35 &F	20 &F	25 &F	-	500 &F	-	5 - 40 L hydraulic cylinders removed, hoses removed
13	Generator Cummins	unk	unk	unk	unk	unk	unk	-	20 &F	20 &F	-	-	-	-	-	-	-	Battery already removed
14-19	Red Storage Cubes	unk	unk	unk	unk	unk	unk	-	-	F		-	-	-	-	-	-	All empty, flush preformed
20	Tamrock H-102 Micro Drill	150	290					60 &F	-	20 &F	60 &F	-	-	-	-	-	-	All hydraulic hoses and cylinders removed - filled 1 tote
23	Getman A-64 Scissor Lift	113	151		2	4		60 &F	-	25 &F	40 &F	-	40 &F	20 &F	-	-	-	All hydraulic hoses and cylinders removed
-	Moloney Electric Transformer Serial # 235871		unk					-	-	-	-	-	-	-	-	-	60	Sample of transformer oil taken for PCB analysis - oil contains PCB, 38 ppm.
	To Be Complete																	
11	Wagner MT-444	700	315		2			600 &F			300 &F	80 &F					-	To be complete: oil cooler removed, steering cylinders, rear box lift, flushing.
21	Tamrock HS205M Drill	60	195		2	4												
22	Atlas Copco Rocket 322s Drill	110	145		2	4												
24	Wagner ST-2D Scooptram	148	144		2													
	Equipment Not Found																	
	1980 Ford Flat deck	120	20	20	2	4	20											
	Wagner MT-426	700	315		2													
	Wagner ST-7.5Z Scooptram	60	195		2													
	Cat 930 Front End Loader	225	20	75	2	3	40											
	TOTAL VOLUME REMOVED							1043.5	108	258	685	165	115	117	500	1000		

unk	unknown
L	liters
ml	milliliters
F	flushed

COA

Site Location: ULU
Your C.O.C. #: 1 of 1

Attention: Sharleen Hamm

Blue Star Gold Corp.
507-700 W. Pender St
Vancouver, BC
CANADA V6C 1G8

Report Date: 2021/07/14
Report #: R3045330
Version: 1 - Final

CERTIFICATE OF ANALYSIS

BV LABS JOB #: C147312
Received: 2021/07/02, 14:52

Sample Matrix: Oil
Samples Received: 1

Analyses	Quantity	Date Extracted	Date Analyzed	Laboratory Method	Analytical Method
Polychlorinated Biphenyl (PCB) (1)	1	2021/07/10	2021/07/10	CAM SOP-00328	EPA 8082A m

Remarks:

Bureau Veritas is accredited to ISO/IEC 17025 for specific parameters on scopes of accreditation. Unless otherwise noted, procedures used by Bureau Veritas are based upon recognized Provincial, Federal or US method compendia such as CCME, MELCC, EPA, APHA.

All work recorded herein has been done in accordance with procedures and practices ordinarily exercised by professionals in Bureau Veritas' profession using accepted testing methodologies, quality assurance and quality control procedures (except where otherwise agreed by the client and Bureau Veritas in writing). All data is in statistical control and has met quality control and method performance criteria unless otherwise noted. All method blanks are reported; unless indicated otherwise, associated sample data are not blank corrected. Where applicable, unless otherwise noted, Measurement Uncertainty has not been accounted for when stating conformity to the referenced standard.

Bureau Veritas liability is limited to the actual cost of the requested analyses, unless otherwise agreed in writing. There is no other warranty expressed or implied. Bureau Veritas has been retained to provide analysis of samples provided by the Client using the testing methodology referenced in this report. Interpretation and use of test results are the sole responsibility of the Client and are not within the scope of services provided by Bureau Veritas, unless otherwise agreed in writing. Bureau Veritas is not responsible for the accuracy or any data impacts, that result from the information provided by the customer or their agent.

Solid sample results, except biota, are based on dry weight unless otherwise indicated. Organic analyses are not recovery corrected except for isotope dilution methods.
Results relate to samples tested. When sampling is not conducted by Bureau Veritas, results relate to the supplied samples tested.

Reference Method suffix “m” indicates test methods incorporate validated modifications from specific reference methods to improve performance.
* RPDs calculated using raw data. The rounding of final results may result in the apparent difference.
(1) This test was performed by Bureau Veritas Ontario (From Calgary)

Encryption Key

Please direct all questions regarding this Certificate of Analysis to your Project Manager.
Customer Solutions, Western Canada Customer Experience Team
Email: customersolutionswest@bureauveritas.com
Phone# (780) 577-7100

==========

BV Labs has procedures in place to guard against improper use of the electronic signature and have the required "signatories", as per ISO/IEC 17025, signing the reports. For Service Group specific validation please refer to the Validation Signature Page.

POLYCHLORINATED BIPHENYLS BY GC-ECD (OIL)

BV Labs ID		ABE199		
Sampling Date		2021/07/02		
COC Number		1 of 1		
	UNITS	MOLONY 238871	RDL	QC Batch
Polychlorinated Biphenyls				
Aroclor 1016	ug/g	<1	1	A285633
Aroclor 1221	ug/g	<1	1	A285633
Aroclor 1232	ug/g	<1	1	A285633
Aroclor 1242	ug/g	<1	1	A285633
Aroclor 1248	ug/g	<1	1	A285633
Aroclor 1254	ug/g	<1	1	A285633
Aroclor 1260	ug/g	38	1	A285633
Aroclor 1262	ug/g	<1	1	A285633
Aroclor 1268	ug/g	<1	1	A285633
Total PCB	ug/g	38	2	A285633
Surrogate Recovery (%)				
2,4,5,6-Tetrachloro-m-xylene	%	85		A285633
Decachlorobiphenyl	%	84		A285633
RDL = Reportable Detection Limit				

Bureau Veritas Laboratories Edmonton: 9331 - 48th Street T6B 2R4 Telephone (780)577-7100 Fax (780)450-4187

GENERAL COMMENTS

POLYCHLORINATED BIPHENYLS BY GC-ECD (OIL) Comments

Polychlorinated Biphenyl (PCB): 95% recovery of a 50 ppm SRM of PCB (A1254) in oil indicates a potential low bias of 5% in the reported results.

Results relate only to the items tested.

Bureau Veritas Laboratories Edmonton: 9331 - 48th Street T6B 2R4 Telephone (780)577-7100 Fax (780)450-4187

BV Labs Job #: C147312
Report Date: 2021/07/14

Blue Star Gold Corp.
Site Location: ULU

QUALITY ASSURANCE REPORT

QA/QC Batch	Init	QC Type	Parameter	Date Analyzed	Value	Recovery	UNITS	QC Limits
A285633	LPG	Matrix Spike	2,4,5,6-Tetrachloro-m-xylene	2021/07/10		87	%	30 - 130
			Decachlorobiphenyl	2021/07/10		85	%	30 - 130
			Aroclor 1260	2021/07/10		100	%	75 - 125
			Total PCB	2021/07/10		100	%	75 - 125
A285633	LPG	QC Standard	2,4,5,6-Tetrachloro-m-xylene	2021/07/10		103	%	30 - 130
			Decachlorobiphenyl	2021/07/10		103	%	30 - 130
			Total PCB	2021/07/10		95	%	80 - 120
A285633	LPG	Spiked Blank	2,4,5,6-Tetrachloro-m-xylene	2021/07/10		97	%	30 - 130
			Decachlorobiphenyl	2021/07/10		97	%	30 - 130
			Aroclor 1260	2021/07/10		109	%	75 - 125
			Total PCB	2021/07/10		109	%	75 - 125
A285633	LPG	Method Blank	2,4,5,6-Tetrachloro-m-xylene	2021/07/10		98	%	30 - 130
			Decachlorobiphenyl	2021/07/10		97	%	30 - 130
			Aroclor 1016	2021/07/10	<1		ug/g	
			Aroclor 1221	2021/07/10	<1		ug/g	
			Aroclor 1232	2021/07/10	<1		ug/g	
			Aroclor 1242	2021/07/10	<1		ug/g	
			Aroclor 1248	2021/07/10	<1		ug/g	
			Aroclor 1254	2021/07/10	<1		ug/g	
			Aroclor 1260	2021/07/10	<1		ug/g	
			Aroclor 1262	2021/07/10	<1		ug/g	
			Aroclor 1268	2021/07/10	<1		ug/g	
			Total PCB	2021/07/10	<2		ug/g	

Matrix Spike: A sample to which a known amount of the analyte of interest has been added. Used to evaluate sample matrix interference.

QC Standard: A sample of known concentration prepared by an external agency under stringent conditions. Used as an independent check of method accuracy.

Spiked Blank: A blank matrix sample to which a known amount of the analyte, usually from a second source, has been added. Used to evaluate method accuracy.

Method Blank: A blank matrix containing all reagents used in the analytical procedure. Used to identify laboratory contamination.

Surrogate: A pure or isotopically labeled compound whose behavior mirrors the analytes of interest. Used to evaluate extraction efficiency.

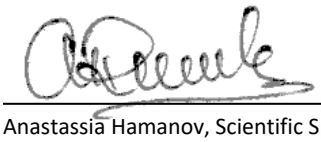
Bureau Veritas Laboratories Edmonton: 9331 - 48th Street T6B 2R4 Telephone (780)577-7100 Fax (780)450-4187

BV Labs Job #: C147312
Report Date: 2021/07/14

Blue Star Gold Corp.
Site Location: ULU

VALIDATION SIGNATURE PAGE

The analytical data and all QC contained in this report were reviewed and validated by:



Anastassia Hamanov, Scientific Specialist

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For Service Group specific validation please refer to the Validation Signature Page.

Bureau Veritas Laboratories Edmonton: 9331 - 48th Street T6B 2R4 Telephone (780)577-7100 Fax (780)450-4187

0010

BUREAU VERITAS

eCOC Offline Template:Reclamation - Haz Waste

This is not intended to be a paper COC. To complete your submission, please upload this file in the jobs section of the Customer Portal.
Please use the Customer Portal for Composite Samples and / or Shelf-life submissions.

INVOICE TO	
Company Name	Blue Star Gold Corp.
Invoice Attention	Sharleen Hamm
Phone	
Email	sharleen.hamm@bluestargold.ca
Address	507-700 W. Pender St
Address 2	
City	Vancouver
Province	BC
Postal Code	V6C 1G8
Country	CANADA

REPORT TO	
Company Name	Blue Star Gold Corp.
Attention To:	Sharleen Hamm
Phone	
Email	sharleen.hamm@bluestargold.ca
Address	507-700 W. Pender St
Address 2	
City	Vancouver
Province	BC
Postal Code	V6C 1G8
Country	CANADA

02-Jul-21 14:52
Customer Solutions
C147312
DKR INS-0157

PROJECT INFORMATION	
Submission Type	Environmental, General
PO/AFE #	
Project #	
Site Location	Ulu
Site #	
Task Order	
Line Item	
Cost Object	

ALSO SEND REPORT TO (one email per box)
enviro@bluestargold.ca
jbembridge@kblenv.com

SELECT CRITERIA 1	
CRITERIA 1	Select
Included on CofA?	No

SELECT CRITERIA 2	
CRITERIA 2	Select
Included on CofA?	No

Received in Yellowknife
By: J. Mercanz
@ 14:52
JUL 02 2021

Temp: 23 / 24 / 23

COMMENTS

PCB in oil. Sample I.D. Moloney Serial # 238871

2021/07/05 1801

ICP - NO
CC - NO

EQUIPMENT CHECKLIST

Equipment Checklist

Technician Name: Good/Jack	DATE June 26
Equipment Manufacturer/Model: Ford 800 Boom truck (KBL01)	Unit Number: KBL01

	Removal Checklist	Y/N/NA	~ Volume (L) / Quantity	Flushed (Y/N/N/A)	Comments
1	Lead Acid Batterie(s)	Y	1		REMOVED
2	Refrigerants	NA			
3	Gas/Diesel	Y	120L	Y	
4	Antifreeze/Coolant	Y	10L	Y	
5	Engine Oil	Y	25L	Y	
6	Hydraulic Oil(s)	Y	60L	Y	
7	Final Drive Oil(s)	NA	10L	Y	
8	Gear Oil(s)	NA			
9	Differential/Axle Oil(s)	Y	2L	Y	
10	Transmission Oil(s)	Y	2L	Y	
11	Power Steering Fluid	Y	500ML	Y	
12	Brake Fluid	NA			
13	Windshield Washer Fluid	NA			
14	Ballasts/Capacitors	NA			
15	Mercury Switches	NA			
16	Lead (Batt Connectors/wheel weights)	NA			
19.	Other: Air Tank	Y		Y	Had OILY WATER
20.	Other: Hoses on Picker	Y	12		
21.	Other:				
22.	Other:				

Item No.	Additional Comments	Initial
	DRAINED ALL Tanks & lines DID A WFL Flush after DRAINED Then Made a Degreaser Mix for the night in All Tanks, lines, Diffs Then Flushed with WATER	
	Took Picker apart & off Truck caped it Took all the hoses	
	4 Pails WATER 3 Pails Degreasor MIX	

COMPLETED BY (Signature)	
L U	

Supervisor (Name)	Signature

Equipment Checklist

Technician Name:	Todd/Jack	DATE	June 26
Equipment Manufacturer/Model:	MACK FUEL TRUCK (KBL02)	Unit Number:	KBL02

	Removal Checklist	Y/N/NA	~ Volume (L) / Quantity	Flushed (Y/N/N/A)	Comments
1	Lead Acid Batterie(s)	NA			
2	Refrigerants	NA			
3	Gas/Diesel	N		Y	MT
4	Antifreeze/Coolant	Y	15L	Y	
5	Engine Oil	Y		Y	MT
6	Hydraulic Oil(s)	N			
7	Final Drive Oil(s)	NA			
8	Gear Oil(s)	No			
9	Differential/Axle Oil(s)	Y	3L	Y	
10	Transmission Oil(s)	NA		Y	
11	Power Steering Fluid	NA			MT
12	Brake Fluid	NA			
13	Windshield Washer Fluid	NA			
14	Ballasts/Capacitors	NA			
15	Mercury Switches	NA			
16	Lead (Batt Connectors/wheel weights)	NA			BRASS
19.	Other:				
20.	Other:				
21.	Other:				
22.	Other:				

Item No.	Additional Comments	Initial
	WFL Flush after DRAINED all tanks & lines	
	Then Put Degreaser Mix in tanks for the night	
	Flushed With WATER Till clean	
	2Pails Degreaser 3 Pails WATER	

LW		
COMPLETED BY (Signature)	Supervisor (Name)	Signature

Equipment Checklist

Technician Name: Gord / Jack	**DATE** June 26
Equipment Manufacturer/Model: WAGNER ST-3.5 Scooptram KBL04	**Unit Number:** KBL04

	Removal Checklist	Y/N/NA	~ Volume (L) / Quantity	Flushed (Y/N/N/A)	Comments
1	Lead Acid Batterie(s)	Y	3		
2	Refrigerants	NA			
3	Gas/Diesel	Y	200L		
4	Antifreeze/Coolant	Y	10L		
5	Engine Oil	Y	15L	Y	
6	Hydraulic Oil(s)	Y	160L	Y	TANK WAS full
7	Final Drive Oil(s)	Y	40L	Y	
8	Gear Oil(s)	N			
9	Differential/Axle Oil(s)	Y	30L	Y	
10	Transmission Oil(s)	Y	60L	Y	
11	Power Steering Fluid	NA			
12	Brake Fluid	NA			
13	Windshield Washer Fluid	NA			
14	Ballasts/Capacitors	NA			
15	Mercury Switches	NA			
16	Lead (Batt Connectors/wheel weights)	N			BRASS
19.	Other:				
20.	Other: HYDROLIC Hoses	Y			
21.	Other: HYDRAULIC cylinders				
22.	Other:				

Item No.	Additional Comments	Initial
	DRAINED ALL TANKS LINES, & DIFF, DRIVES Flushed with WFL & had a MIX of Degreaser MIX SIT for the night then Flushed Till Clean With WATER. RIPPED DRIVE Shafts out So Equipment can move easier to spot To Work On	

COMPLETED BY (Signature)	Supervisor (Name)	Signature

Equipment Checklist

Technician Name: Gord / Jack	**DATE** June 27
Equipment Manufacturer/Model: Gen 600 KW CAT	**Unit Number:** Gen 600KW CAT KBL06

Removal Checklist		Y/N/NA	~ Volume (L) / Quantity	Flushed (Y/N/N/A)	Comments
1	Lead Acid Batterie(s)	NA			
2	Refrigerants	NA			
3	Gas/Diesel	Y	500ML		
4	Antifreeze/Coolant	Y	10L		
5	Engine Oil	Y	45L		
6	Hydraulic Oil(s)	NA			
7	Final Drive Oil(s)	NA			
8	Gear Oil(s)	NA			
9	Differential/Axle Oil(s)	NA			
10	Transmission Oil(s)	NA			
11	Power Steering Fluid	NA			
12	Brake Fluid	NA			
13	Windshield Washer Fluid	NA			
14	Ballasts/Capacitors	NA			
15	Mercury Switches	NA			
16	Lead (Batt Connectors/wheel weights)	NA			
19.	Other:				
20.	Other: Hoses	Y	2		
21.	Other:				
22.	Other:				

Item No.	Additional Comments	Initial
	DRAINED ALL Tank & lines Did A WFL Flush	
	Then made a Degreaser Mix & had it Sit For	
	night, then Flushed all liquids out	
	Hoses had liquid in them From Draining	

COMPLETED BY (Signature)	Supervisor (Name)	Signature

Equipment Checklist

Technician Name: Ford Jack	**DATE** June 27
Equipment Manufacturer/Model: Gen 600KW CAT	**Unit Number:** KBL05

	Removal Checklist	Y/N/NA	~ Volume (L) / Quantity	Flushed (Y/N/N/A)	Comments
1	Lead Acid Batterie(s)	NA			
2	Refrigerants	NA			
3	Gas/Diesel	Y	1L ~~Diesel~~		Filter on WALL had 1L
4	Antifreeze/Coolant	Y	10L	Y	
5	Engine Oil	Y	~~200~~ 30L	Y	
6	Hydraulic Oil(s)	NA			
7	Final Drive Oil(s)	NA			
8	Gear Oil(s)	NA			
9	Differential/Axle Oil(s)	NA			
10	Transmission Oil(s)	NA			
11	Power Steering Fluid	NA			
12	Brake Fluid	NA			
13	Windshield Washer Fluid	NA			
14	Ballasts/Capacitors	NA			
15	Mercury Switches	NA			
16	Lead (Batt Connectors/wheel weights)	NA			
19.	Other:				
20.	Other:				
21.	Other:				
22.	Other:				

Item No.	Additional Comments	Initial
	WE DRAINED ALL TANKS & lines CHECKED VALVES Then FILLED TANKS WITH A Degreaser MIX & Let Sit ~~OVER~~ over night Flushed RAD & WATER Heater ~~Boost~~ lines, Then Flushed out Degreaser & WATER T.V Clean	
	DID WFL WASH Before Degreaser	
	(1 Pail MIX Solvent ~~20L~~ 2 ~~DA~~ Pail WATER ~~20L~~)	

COMPLETED BY (Signature)	Supervisor (Name)	Signature

Equipment Checklist

Technician Name: Gord / Jack	**DATE** June 27
Equipment Manufacturer/Model: COMPRESSOR 600 CFM	**Unit Number:** KBL08

Removal Checklist	Y/N/NA	~ Volume (L) / Quantity	Flushed (Y/N/N/A)	Comments
1 Lead Acid Batterie(s)	NA			
2 Refrigerants	NA			
3 Gas/Diesel	NA			
4 Antifreeze/Coolant	NA		Y	ALREADY Been DRAINED
5 Engine Oil	NA		Y	" "
6 Hydraulic Oil(s)	NA			
7 Final Drive Oil(s)	NA			
8 Gear Oil(s)	NA			
9 Differential/Axle Oil(s)	NA			
10 Transmission Oil(s)	NA			
11 Power Steering Fluid	NA			
12 Brake Fluid	NA			
13 Windshield Washer Fluid	NA			
14 Ballasts/Capacitors	NA			
15 Mercury Switches	NA			
16 Lead (Batt Connectors/wheel weights)	NA			
19. Other:				
20. Other: Hydrolic Hoses		4		
21. Other:				
22. Other:				

Item No.	Additional Comments	Initial
	WE CKeck all DRAINS All MT	
	good To GO	
	Flushed With WFC Before Degreaser mix	
	FLUSHED Tanks To make Sure ITS cleaned	
	1 Pail Solvent 2 Pail WATER	
	Hoses had liquid from DRAINING Tanks from Perivios guys that MT Equipment	

COMPLETED BY (Signature)	Supervisor (Name)	Signature

Equipment Checklist

Technician Name: Gord / Jack	DATE June 27
Equipment Manufacturer/Model: Gen 250KW Detroit	Unit Number: KBL07

	Removal Checklist	Y/N/NA	~ Volume (L) / Quantity	Flushed (Y/N/N/A)	Comments
1	Lead Acid Batterie(s)	NA			
2	Refrigerants	NA			
3	Gas/Diesel	NA			
4	Antifreeze/Coolant	Y	3L	Y	
5	Engine Oil	Y	25L	Y	
6	Hydraulic Oil(s)	NA			
7	Final Drive Oil(s)	NA			
8	Gear Oil(s)	NA			
9	Differential/Axle Oil(s)	NA			
10	Transmission Oil(s)	NA			
11	Power Steering Fluid	NA			
12	Brake Fluid	NA			
13	Windshield Washer Fluid	NA			
14	Ballasts/Capacitors	NA			
15	Mercury Switches	NA			
16	Lead (Batt Connectors/wheel weights)	NA			
19.	Other: Hoses		2		
20.	Other:				
21.	Other:				
22.	Other:				

Item No.	Additional Comments	Initial
	CLEAN	
	WE Did A Flush With WFL after DRAINING Tanks, Then WE Put a mix of Degreaser ? WATER in Tanks LET SIT for the night Next Day DRAIN & FLUSHED WITH WATER	
	1 Pail of Solvent & 2 Pail of WATER Put in Tote after it Was used to clean	

COMPLETED BY (Signature)	Supervisor (Name)	Signature

Equipment Checklist

Technician Name:	Gord / Jack	DATE	June 27
Equipment Manufacturer/Model:	Gen 500KW Cummings	Unit Number:	KBL 09

	Removal Checklist	Y/N/NA	~ Volume (L) / Quantity	Flushed (Y/N/N/A)	Comments
1	Lead Acid Batterie(s)	NA			ALREADY REMOVED
2	Refrigerants	NA			
3	Gas/Diesel	N			TANK WAS MT & VENTED
4	Antifreeze/Coolant	Y	20L	Y	
5	Engine Oil	Y	60L	Y	OIL Tank on Wall WAS Full
6	Hydraulic Oil(s)	NA			
7	Final Drive Oil(s)	NA			
8	Gear Oil(s)	NA			
9	Differential/Axle Oil(s)	NA			
10	Transmission Oil(s)	NA			
11	Power Steering Fluid	NA			
12	Brake Fluid	NA			
13	Windshield Washer Fluid	NA			
14	Ballasts/Capacitors	NA			
15	Mercury Switches	NA			
16	Lead (Batt Connectors/wheel weights)	24	2		
19.	Other:				
20.	Other:				
21.	Other: Hoses				
22.	Other:				

Item No.	Additional Comments	Initial
	DRAINED ALL TANKS & lines, FLUSHED out RAD & WATER HEATER lines, Put a mix of Degreaser & WATER in tanks for the night then Flushed out With WATER	
	WFL Flushed Before Degreaser MIX	
	Took Hoses used to DRAIN Equipment	

COMPLETED BY (Signature)	Supervisor (Name)	Signature

Equipment Checklist

Technician Name: Gord / Jack	**DATE** June 27
Equipment Manufacturer/Model: Gen 500KW cummings	**Unit Number:** KBL 10

Removal Checklist		Y/N/NA	~ Volume (L) / Quantity	Flushed (Y/N/N/A)	Comments
1	Lead Acid Batterie(s)	N.			ALREADY REMOVED
2	Refrigerants	NA			
3	Gas/Diesel	N			TANK WAS MT & VENTED
4	Antifreeze/Coolant	Y	10L	Y	
5	Engine Oil	Y	10L	Y	Tank on WALL was MT
6	Hydraulic Oil(s)	NA			
7	Final Drive Oil(s)	NA			
8	Gear Oil(s)	NA			
9	Differential/Axle Oil(s)	NA			
10	Transmission Oil(s)	NA			
11	Power Steering Fluid	NA			
12	Brake Fluid	NA			
13	Windshield Washer Fluid	NA			
14	Ballasts/Capacitors	NA			
15	Mercury Switches	NA			
16	Lead (Batt Connectors/wheel weights)	Y	2		
19.	Other: Hoses				
20.	Other:				
21.	Other:				
22.	Other:				

Item No.	Additional Comments	Initial
	DRAIN ALL TANK Till Nothing Came out	
	Then Put Degreaser mix in tanks for the	
	night Then Flushed out with WATER	
	Before Degreaser mix it WAS Flushed With	
	WFL	
	Took Hoses that had liquid in them	

COMPLETED BY (Signature)	Supervisor (Name)	Signature

Equipment Checklist

Technician Name: Gord / Jack	**DATE** June 27
Equipment Manufacturer/Model: MT444	**Unit Number:** KBL 11

Removal Checklist	Y/N/NA	~ Volume (L) / Quantity	Flushed (Y/N/N/A)	Comments
1 Lead Acid Batterie(s)				
2 Refrigerants				
3 Gas/Diesel	Y	600L		
4 Antifreeze/Coolant				
5 Engine Oil				
6 Hydraulic Oil(s)	Y	300L		
7 Final Drive Oil(s)	Y	80L		
8 Gear Oil(s)				
9 Differential/Axle Oil(s)				
10 Transmission Oil(s)				
11 Power Steering Fluid				
12 Brake Fluid				
13 Windshield Washer Fluid				
14 Ballasts/Capacitors				
15 Mercury Switches				
16 Lead (Batt Connectors/wheel weights)				
19. Other:				
20. Other:				
21. Other:				
22. Other:				

Item No.	Additional Comments	Initial

COMPLETED BY (Signature)	**Supervisor (Name)**	**Signature**

Equipment Checklist

Technician Name: Gord / Jack	**DATE** June 28
Equipment Manufacturer/Model: CAT 824C Bulldozer	**Unit Number:** KBL 12

Removal Checklist		Y/N/NA	~ Volume (L) / Quantity	Flushed (Y/N/N/A)	Comments
1	Lead Acid Batterie(s)	N			ALREADY REMoved
2	Refrigerants	NA			
3	Gas/Diesel	Y	2L		
4	Antifreeze/Coolant	N	0	Y	WAS MT
5	Engine Oil	Y	3L	Y	
6	Hydraulic Oil(s) Tank	Y	25L	Y	
7	Final Drive Oil(s)	Y	~~35L~~	Y	
8	Gear Oil(s)	~~NA~~			
9	Differential/Axle Oil(s)	Y	20L	Y	
10	Transmission Oil(s)	Y	25L	Y	
11	Power Steering Fluid	NA			
12	Brake Fluid	Y	500ML	Y	
13	Windshield Washer Fluid	NA			
14	Ballasts/Capacitors	NA			
15	Mercury Switches	NA			
16	Lead (Batt Connectors/wheel weights)	NA			
19.	Other: Hydrolic cylenders	Y	(5) ~~40L~~	Y	
20.	Other: Hydrolic Hoses	Y			Put in tote
21.	Other:				
22.	Other:				

Item No.	Additional Comments	Initial
7	DRAINED ; POLLED DRIVES So Equipment can Move to SPot WE NEED ; DRIVES	
	DRAINED ALL tanks; Flushed all tank ; Diffs ; Drives With WFL	
	Then Filled all tanks Diffs ; Drives With Degreaser an let Sit Over night, Then Flushed all Tanks diffs ; DRIVES	
	6 Pails of (mix) Degreaser ; WATER	
	8 Pails of WATER	
	Jack made Cabs to Finsher it off	

LW		
COMPLETED BY (Signature)	**Supervisor (Name)**	**Signature**

Equipment Checklist

Technician Name: Gord / Jack	**DATE** June 30
Equipment Manufacturer/Model: Gen Cummins	**Unit Number:** KBL13

	Removal Checklist	Y/N/NA	~ Volume (L) / Quantity	Flushed (Y/N/N/A)	Comments
1	Lead Acid Batterie(s)	N			ALREADY REMOVED
2	Refrigerants	NA			
3	Gas/Diesel	NA			
4	Antifreeze/Coolant	Y	20L	Y	
5	Engine Oil	Y	20L	Y	
6	Hydraulic Oil(s)	NA			
7	Final Drive Oil(s)	NA			
8	Gear Oil(s)	NA			
9	Differential/Axle Oil(s)	NA			
10	Transmission Oil(s)	NA			
11	Power Steering Fluid	NA			
12	Brake Fluid	NA			
13	Windshield Washer Fluid	NA			
14	Ballasts/Capacitors	NA			
15	Mercury Switches	NA			
16	Lead (Batt Connectors/wheel weights)	N			BRASS
19.	Other:				
20.	Other:				
21.	Other:				
22.	Other:				

Item No.	Additional Comments	Initial
	DRAINED N Flushed, Tanks 3 WATER Cooler lines	
	WFL ~~Wash~~ Flush 3 & Degreaser Mix With WATER	
	WAS Put in tanks for the night	

COMPLETED BY (Signature)	

Supervisor (Name)	Signature

Equipment Checklist

Technician Name: Gord/Jack	**DATE** July 2
Equipment Manufacturer/Model: RED Storage CUBES	**Unit Number:** Red cubes (6) (KBL 14,15,16,17,18,19)

Removal Checklist	Y/N/NA	~ Volume (L) / Quantity	Flushed (Y/N/N/A)	Comments
1 Lead Acid Batterie(s)				
2 Refrigerants				
3 Gas/Diesel				
4 Antifreeze/Coolant				
5 Engine Oil	N		Y	They were all MT
6 Hydraulic Oil(s)				
7 Final Drive Oil(s)				
8 Gear Oil(s)				
9 Differential/Axle Oil(s)				
10 Transmission Oil(s)				
11 Power Steering Fluid				
12 Brake Fluid				
13 Windshield Washer Fluid				
14 Ballasts/Capacitors				
15 Mercury Switches				
16 Lead (Batt Connectors/wheel weights)				
19. Other:				
20. Other:				
21. Other:				
22. Other:				

Item No.	Additional Comments	Initial
1	[redacted] Flushed WHL Degreaser KBL 14	
2	FLUSHED With Degreaser KBL 15	
3	FLUSHED With Degreaser KBL 16	
4	FLUSHED With Degreaser KBL 17	
5	FLUSHED With Degreaser KBL 18	
6	FLUSHED With Degreaser KBL 19	

COMPLETED BY (Signature)	Supervisor (Name)	Signature

Equipment Checklist

Technician Name: Gord/Jack	**DATE** July 4
Equipment Manufacturer/Model: Tamrock H-102 MICRO DRILL	**Unit Number:** KBL20

	Removal Checklist	Y/N/NA	~ Volume (L) / Quantity	Flushed (Y/N/N/A)	Comments
1	Lead Acid Batterie(s)	NA			
2	Refrigerants	NA			
3	Gas/Diesel	Y	60L	Y	
4	Antifreeze/Coolant	NA			Air cooled
5	Engine Oil	Y	20L	Y	
6	Hydraulic Oil(s)	Y	60L	Y	
7	Final Drive Oil(s)	NA			
8	Gear Oil(s)	NA			
9	Differential/Axle Oil(s)	NA			HYDROLIC DRIVEN
10	Transmission Oil(s)	NA			
11	Power Steering Fluid	NA			
12	Brake Fluid	NA			
13	Windshield Washer Fluid	NA			
14	Ballasts/Capacitors	NA			
15	Mercury Switches	NA			
16	Lead (Batt Connectors/wheel weights)	NA			
19.	Other: Hoses	Y	ALL		Full Tote
20.	Other: Hydrolic cylinders	Y	ALL		
21.	Other:				
22.	Other:				

Item No.	Additional Comments	Initial
19	ALL Hoses WERE REMoved	
20	ALL cylinders WERE Removed	
	4 Days on this all hoses were taken off HAD to cut up Equipment to get it all out Cut off Boom after cylinders & lines taken offs	
	FLUSHED ALL Tanks & lines with WFL 3 A Degreuser mix for the night	

COMPLETED BY (Signature)	Supervisor (Name)	Signature

Equipment Checklist

Technician Name: Gord / Jack	**DATE** July 6
Equipment Manufacturer/Model: GetMon A-64 SCISSOR lift	**Unit Number:** KBL 23

Removal Checklist		Y/N/NA	~ Volume (L) / Quantity	Flushed (Y/N/N/A)	Comments
1	Lead Acid Batterie(s)	NA			
2	Refrigerants	NA			
3	Gas/Diesel	Y	60L	Y	Removed
4	Antifreeze/Coolant	NA			AIR Cooled
5	Engine Oil	Y	25L	Y	
6	Hydraulic Oil(s)	Y	40L	Y	FLUSHED & REMOVED
7	Final Drive Oil(s)	NA			
8	Gear Oil(s)	NA			
9	Differential/Axle Oil(s)	Y	40L	Y	Removed Both Diffs
10	Transmission Oil(s)	Y	20L	Y	
11	Power Steering Fluid	NA			
12	Brake Fluid	NA			
13	Windshield Washer Fluid	NA			
14	Ballasts/Capacitors	NA			
15	Mercury Switches	NA			
16	Lead (Batt Connectors/wheel weights)	NA			
19.	Other: Hoses	Y	ALL		
20.	Other: Cylinders	Y	ALL		
21.	Other:				
22.	Other:				

Item No.	Additional Comments	Initial
	HAD the lift Tipped on side for Safer access Then cut the Deck off with torch then Removed all Hoses From Deck then cut off Engine DID & Flush, Then cut off Diffs set them on Flat Ground, & DRAINED & FLUSHED, Remove all Cylinders, Put Degreaser MIX in Trans & Diffs, & Engine for night	

COMPLETED BY (Signature)	Supervisor (Name)	Signature

Equipment Checklist

Technician Name: Gordon / Jack	**DATE** July 3
Equipment Manufacturer/Model: CAT WATER Truck	**Unit Number:** KBL 03

Removal Checklist	Y/N/NA	~ Volume (L) / Quantity	Flushed (Y/N/N/A)	Comments
1 Lead Acid Batterie(s)	NA			
2 Refrigerants	NA			
3 Gas/Diesel	NA			
4 Antifreeze/Coolant	Y		Y	Lines RADS Out
5 Engine Oil	N		Y	OIL Pan has A Big hole Flushed
6 Hydraulic Oil(s)	Y	40L	Y	
7 Final Drive Oil(s)	NA			
8 Gear Oil(s)	NA			
9 Differential/Axle Oil(s)	Y	20L	Y	
10 Transmission Oil(s)	Y	10	Y	
11 Power Steering Fluid	NA			
12 Brake Fluid	NA			
13 Windshield Washer Fluid	NA			
14 Ballasts/Capacitors	NA			
15 Mercury Switches	NA			
16 Lead (Batt Connectors/wheel weights)	NA			BRASS
19. Other: AIR TANK	Y	10L	Y	OILY WATER
20. Other:				
21. Other:				
22. Other:				

Item No.	Additional Comments	Initial
5	OIL Pan has A Big hole I Flushed it into funnle	
	DRAINED Diff & Tanks Flushed With WFL Then Made a Mix of Degreaser than had In for the night Flushed till clean	
19	Air tank WAS Full of OILY WATER Flushed With WFL & Degreaser	

COMPLETED BY (Signature)	Supervisor (Name)	Signature

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October 3, 2025
Project No: CAPR003914

Darren Lindsay
VP Exploration
Blue Star Gold Corp.
507 – 700 West Pender Street
Vancouver, BC V6C 1G8

Dear Darren:

RE: Interim Closure and Reclamation Plan Costing Update

Following consultation between Blue Star Gold Corp , the Kitikmeot Inuit Association (KIA), SteveJan Consultants (SJCI representing KIA) & SRK Consulting (Canada) Inc. on January 20, 2025, the 2020 Ulu Project Interim Closure and Reclamation Plan (ICRP) costing was updated to reflect the work completed since the initial submission in 2020 to the end of the 2024 field season. The following outlines the key considerations that informed the revised costing:

- The quantities were adjusted based on work completed or adjustments to the original quantities due to improved understanding of site conditions. These values were discussed and agreed with SJCI and Blue Star during a site visit in August 2024. SRK has included comments on all updated line items and included a zero-dollar value for items where the work is fully complete in the attached table for reference. Examples of quantity adjustments include:
  - 90% of the demolition was completed; the 2024 quantity reflects the remaining 10% of the original amount.
  - KEL Environmental provided updated petroleum hydrocarbon contaminated material quantities in 2024, which are approximately one-quarter of the initial amount. The soil treatment facility was reduced to half its size, and construction quantities were reduced by 50%.
- The unit rates were not reconstructed for the 2024 budget update; instead, the 2020 rates were adjusted by 17.68% for inflation based on the Bank of Canada's inflation calculator for 2020 to 2024 (https://www.bankofcanada.ca/rates/related/inflation-calculator/).
- The metal leaching and acid rock drainage (ML/ARD) investigation, outlined in the 2020 ICRP, was completed and found that approximately 90% of the rock brought to the surface is potentially acid generating (PAG). The costing includes an additional $150,000 to advance the long-term ML/ARD management plan development and $200,000 for the interim (short-term) management of problematic

areas. The allowances are intended for the immediate term; however, it is worth noting that long-term ML/ARD management will be required and will incur costs that are notably greater than those currently estimated. Blue Star has committed to updating the closure plan within the next 6 to 12 months, which will include a detailed long-term ML/ARD management component.

- Blue Star and KIA (John Roesch) discussed the possibility of reducing the Ulu Project security if Blue Star mobilizes newer equipment to site. The basis of the security reduction includes:
  - The new equipment will increase work efficiency, allowing work to be completed more efficiently by reducing overall project duration and lowering unit costs through the use of more appropriate equipment.
  - The current unit rates are low due to Blue Star owning the equipment on site, and do not account for renting or purchasing equipment. Allowing Blue Star to purchase equipment with funds outside of the ICRP costing will help maintain the current unit costs.
  - A $320,000 contingency was included in the initial ICRP costing for the rebuilding/repair of existing equipment. This was added to the contingency by Blue Star, as the condition of the existing equipment was unknown at the time (2020). Over the past four years, Blue Star has invested a considerable amount of money in rebuilding its existing equipment. The $320,000 contingency for equipment rebuilds/repairs was removed due to work completed and additional equipment brought to site by Blue Star in 2025.
  - The equipment would remain the property of KIA until the interim closure work is completed.
  - Blue Star also highlighted that they would like to request a reduction of the contingency from 20% to 18%. This was added based on the discussions with Blue Star and KIA; however, it was not reflected in SJCI's costing submission.

Sincerely,
SRK Consulting (Canada) Inc.

DRAFT

Darryl Godley, BSc, PEng (NU, NWT, Yukon & BC)
Senior Consultant

ICRP Costing

COST ESTIMATE

	Task	Qnty (2020)	Qnty (Updated)	Unit	Unit Rate (Incl. Inflation)	2025 Subtotal Cost	2025 Total	Comments
1. DIRECT COSTS								
1.1	**Building Demolition**						**$3,941.19**	
	Demolition of Existing Weather Havens							
	Demolition of Ulu Camp	4,569	457	m³	$8.63	$3,941.19		The majority of demolition is completed, with the arctic corridor remaining (the remainder of the camp will be salvaged and is included under the exploration camp securities); 10% of the original volume remaining.
	1) Disposal of waste accounted for under Section 1.2 Non-Hazardous Landfill *2) Decommissioning of electrical and mechanical accounted for in camp costs*							
1.2	**Non-Hazardous Waste Landfill**						**$110,529.86**	
	Existing Waste Handling							
	Transport to Facility (Load and Haul)	6,900	1,380	m³	$11.74	$16,207.36		
	Transport to Facility (Utilizing Dozer Push/Pull)	4,600	920	m³	$7.86	$7,232.14		80% of work complete, quantity adjusted to 20% of the original total.
	Placement/Packing in Facility (Excavator/Front End Loader/Dozer)	11,500	2,300	m³	$2.67	$6,144.07		
	Additional Waste Handling							
	Transport Ulu Camp Demolition Waste to Facility (Load and Haul)	1,142	0	m³	$11.74	$0.00		Work Complete.
	Transport Additional Waste to Facility - esker, equipment etc. (Load an	3,400	0	m³	$11.74	$0.00		Work Complete.
	Placement/Packing in Facility (Excavator/Front End Loader/Dozer)	4,542	0	m³	$2.67	$0.00		Work Complete.
	Closure							
	Intermediate Cover (Load, haul and place)	2,485	497	m³	$10.34	$5,141.00		Intermediate cover complete, assuming that 20% will require replacement when landfilling the remaining non-hazardous waste
	Final Cover (Load, haul and place)	3,130	3,130	m³	$19.02	$59,523.49		
	Contouring of Cover Material	5,615	5,615	m³	$2.67	$14,999.55		
	Water Management							
	Drainage Contouring/Sloping Around Facility Perimeter	480	480	m³	$2.67	$1,282.24		
	Allowance (Pumping, diversion trenching etc.)	1	0	ea	$23,536.00	$0.00		The landfill no longer extends higher than the northern natural ground therefore it is unlikely a deversion is required, the water management will be dealt with in contouring of cover material.
1.3	**Soil Treatment Facility**						**$301,433.17**	
	Facility Earthworks							
	Foundation and Berm Construction - Dozer	9,173	4,587	m³	$1.99	$9,121.69		
	Foundation and Berm Construction - Excavator & Truck	6,115	3,058	m³	$18.78	$57,428.89		The volume of petroleum hydrocarbon-contaminated (PHC) material requiring treatment in a Soil Treatment Facility has reduced compared to the original estimate. This is due to the treatment of the existing soil by aeration of existing piles from 2020 to date, and additional investigation conducted by KEL. 50% reduction in the facility size (KEL, 2024). Only one of the two planned cells is to be constructed.
	Bedding Placement	845	422	m³	$13.11	$5,535.51		
	Liner Cover Placement	2,252	1,126	m³	$13.11	$14,761.36		
	Liner Installation							
	Geotextile and LLDPE Installation	6,756	3,378	m²	$17.65	$59,628.46		
	Material Sorting and Placement							
	Sorting of PHC Contaminated Material	6,000	2,000	m³	$9.31	$18,616.98		Sorting of PHC material has been ongoing since 2020, with two areas remaining for sorting (below the workshop and Ulu Camp tank farm). The volume is reduced to 2000 m3 based on these areas. The KEL report outlines approximately 900m3 of PHC material for STF treatment. Due to additional sorting still required, a volume of 2000m3 was selected as a conservative estimate.
	Load and Haul to Facility	4,000	2,000	m³	$10.34	$20,688.14		
	Placement in STF Facility	4,000	2,000	m³	$13.11	$26,219.10		
	Monitoring							
	Baseline and Post Closure PHC Contamination Testing	10	10	ea	$208.00	$2,079.99		
	Operational PHC Contamination Testing	123	123	ea	$116.24	$14,298.05		
	Water Quality Sampling	38	38	ea	$199.23	$7,570.83		
	Annual Operations							
	Tilling/mechanical turning of material 2025	16	16	days	$1,885.59	$30,169.39		
	Material Removal 2026	2,400	1,000	m³	$13.11	$13,109.55		Adjusted based on updated volume for treatment within STF.
	Material Transfer/Placement 2026	800	500	m³	$13.11	$6,554.78		
	Material Removal 2027	800	500	m³	$13.11	$6,554.78		
	Closure							
	Liner removal	5,630	2,815	m²	$1.07	$3,014.55		As outlined above, 50% reduction in the facility size, only one of the two originally planned cells to be constructed.
	Levelling of Facility Berms	6,115	3,058	m³	$1.99	$6,081.13		
1.4	**Ore Management**						**$0.00**	
	Repair of Mine Sump							
	Remove of Mineralised Material in Sump Berms	50	0	m³	$2.67	$0.00		
	Load and Haul Material for Sump Berms	50	0	m³	$18.78	$0.00		
	Placement of Material for Sump Berms	50	0	m³	$2.67	$0.00		
	Replace Base Liner System	680	0	m²	$17.65	$0.00		
	Ore Placement in Mine Sump							Task removed from closure costing. The initial Interim Closure and Reclamation Plan identified the ore to be potentially acid generating (PAG), the geochemical investigation which followed identified approximately 90% of the surface rock to be PAG and as a result, the management of the ore will now be included in the site-wide Metal Leach & Acid Rock Drainage (ML/ARD) management plans.
	Load and Haul Ore in Mine Sump	1,850	0	m³	$18.78	$0.00		
	Placement of Ore in Sump	1,850	0	m³	$13.11	$0.00		
	Cover							
	Liner Cover	1,040	0	m²	$17.65	$0.00		
	Esker Sand Cover Load and Haul to Sump	312	0	m³	$10.34	$0.00		
	Esker Sand Placement and Contouring	312	0	m³	$2.67	$0.00		
1.5	**Mine Workings**						**$0.00**	
	Portal Cover (Allowance)							
	Placement of Temporary Barrier (Sea Cans)	1	0	allow	$1,541.33	$0.00		Work complete. The portal entrance is blockaded with seacans.
	Steel Vent Raise Cover (Allowance)							
	Engineering Design	1	0	allow	$27,490.05	$0.00		Task removed. Ongoing monitoring of the existing vent raise cover has found that the cover remains stable with no sign of instability. Blue Star is to continue monitoring, but no additional work is required until final long-term closure.
	Fabrication and Installation of Steel Vent Cover	1	0	allow	$36,587.37	$0.00		

COST ESTIMATE

	Task	Qnty (2020)	Qnty (Updated)	Unit	Unit Rate (Incl. Inflation)	2025 Subtotal Cost	2025 Total	Comments
1.6	**Hazardous Material Management**						**$28,219.18**	
	Hazardous Materials							
	Treatment of Hazardous Material on site (Allowance)	1	1	allow	$8,237.60	$8,237.60		Keep allowance.
	Treatment of Hazardous Material Removed from Site	110	20	m³	$305.97	$6,119.36		Planned work complete, allowance of 20m3 remains due to ongoing works.
	Hydrocarbon Contaminated Material Initial Earthworks and sampling							
	Dozer work ripping frozen ground	6,000	1,200	m³	$1.99	$2,386.55		Work is ongoing from 2020 and 2024; 20% remaining for remaining material sorting.
	PHC Contamination sampling	81	81	ea	$141.67	$11,475.67		
1.7	**Borrow & Quarry**						**$5,656.76**	
	Contouring of Borrow Area(s)							
	Contouring of Esker Borrow Area	3	3	days	$1,885.59	$5,656.76		
1.8	**Construction Material Transport to Site**						**$23,193.84**	
	Liner							
	Soil Treatment Facility Liner	9,323	4,662	kg	$3.97	$18,487.21		As outlined above in Item 1.3, there will be a 50% reduction in the STF size; only one of the two originally planned cells to be constructed, therefore a reduction in the liner volume.
	Mine Sump and Ore Management Liner	2,374	1,187	kg	$3.97	$4,706.63		Task removed as outlined in Item 1.4
						SUBTOTAL - DIRECT COSTS	**$472,973.99**	
2. INDIRECT COSTS								
2.1	**Mobilization & Camp Operations**						**$493,081.34**	
	Camp Operations (Including mobilization, operations and closure)	6		Years	$82,180.22	$493,081.34		Monthly camp costs for Blue Star Gold in 2024, including mobilization, all operations related to the camp, and camp closure, total $136,967.04 (value provided by Blue Star Gold Corp.). As agreed between Blue Star and KIA, due to the primary work supporting the exploration activities, 20% of the value is allocated to reclamation on a monthly basis. Assuming 3 months of camp operation per year for 6 years remaining with the current water license.
2.2	**Waste Rock ML/ARD Investigation**						**$150,000.00**	
	Site Investigation and Reporting							
	Transport and Accommodation	1		ea	$3,530.40	$0.00		Task Complete.
	Consultant Fieldwork	84		hrs	$196.53	$0.00		
	Test Pits (Excavator)	5		days	$1,623.51	$0.00		
	Laboratory Testing	37		ea	$301.91	$0.00		
	Reporting	1		ea	$11,768.00	$0.00		
	Progress ML/ARD Management Plan							Engineering fees to progress long-term ML/ARD Management Plan. Includes trade-off study for management options, recommendations on data collection, and advancing management approach.
	Engineering Fees		1	ea	$150,000.00	$150,000.00		
2.3	**Monitoring and Reporting**						**$160,639.92**	
	Annual Visual Inspections (Landfill and STF)							
	Visual Inspection of STF and Landfill	0		years	$3,318.58	$0.00		Incorporated in annual geotechnical inspections
	Annual Geotechnical Inspection							
	Field Inspection and Technical Report	10	6	Years	$25,000.00	$150,000.00		Updated for 6 remaining years for water licence
	Water Quality Laboratory Testing							
	Water Quality Laboratory Testing	86	60	ea	$177.33	$10,639.92		Sample quantitiy was reduced to 60, based on reduced sampling plan 2024
2.4	**Management and QA/QC**						**$100,800.00**	
	Survey							
	Survey Control STF and Landfill	4	0	day	$2,824.32	$0.00		Survey reference points installed around Ulu camp, airstrip and borrow area.
	Transport to/from Site	2	0	allow	$3,530.40	$0.00		
	Construction Oversight							
	Consulting (Construction Support STF and Landfill)	1	2	years	$50,400.00	$100,800.00		Allowance for 2 years having an engineer visit the site for 3 weeks. Fees only.
2.5	**Bonding/Insurance**						**$4,729.74**	
	Bonding/Insurance	1%	1%	of direct costs	$472,973.99	$4,729.74		Adjusted based on direct costs
2.6	**Health and Safety**						**$4,729.74**	
	Health and Safety	1%	1%	of direct costs	$472,973.99	$4,729.74		Adjusted based on direct costs
2.7	**Project Management**						**$23,648.70**	
	Project Management	5%	5%	of direct costs	$472,973.99	$23,648.70		Adjusted based on direct costs
2.8	**Engineering**						**$23,648.70**	
	Engineering	5%	5%	of direct costs	$472,973.99	$23,648.70		Adjusted based on direct costs
2.9	**Contingency**						**$285,135.32**	
	Contingency	20%	18%	of direct costs	$472,973.99	$85,135.32		Adjusted based on direct costs (20% RECLAIM to 18% adjusted percentage as requested by Blue Star)
	Large Equipment Rebuild/Repair	4	0	ea.		$0.00		Contingency removed due repairs completed and additional pieces of equipment mobilized to site
	Acid Rock Interim Management - Consolidation and Cover		1			$200,000.00		$200k allowance as per SteveJan (KIA) and Blue Star agreement
	PAG/AG Rock Consolidation		0	m³	$18.78	$0.00		Consolidation and cover to manage potentially acid generating rock removed and replaced with lump sum $200,000 contingency as per KIA and Blue Star agreement.
	Cover Placement		0	m³	$19.02	$0.00		
						SUBTOTAL - INDIRECT COSTS	**$1,246,413.46**	
						SUBTOTAL - DIRECT COSTS	**$472,973.99**	
						TOTAL	**$1,719,387.46**	

Notes: *1. Direct/Indirect costs based on Contaminated Sites Program, Natural Resources and Environment Branch, Northern Affairs Program, Indian and Northern Affairs Canada. 2006. Contaminated Sites Cost Estimating Guide, October 23, 2006*

2. Costs updated based on work done and original ICRP costing rates plus inflation from 2020 to 2024 according to the Bank of Canada https://www.bankofcanada.ca/rates/related/inflation-calculator/. New rates were not developed for this costing update.

3. KEL 2024. 2024 Limited Phase II Environmental Site Assessment, Ulu Gold Project. Prepared for Blue Star Gold Corp. by KEL Environmental Ltd., September 20, 2024.

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Memo

To:	Peter Kuhn, Blue Star	**Client:**	Blue Star Gold Corp.
From:	Darryl Godley, SRK	**Project No:**	1CB041.000
Cc:	Mark Liskowich, SRK	**Date:**	December 11, 2020
Subject:	Costing Assumptions Summary for Ulu Gold Project Interim Closure and Reclamation Plan		

1 Introduction

The Ulu Gold Project (the Project) is located on Inuit Owned Lands in the Kitikmeot region of Nunavut, approximately 200 km southeast of Kugluktuk, Nunavut. Underground exploration was conducted in 1996, 1997, 2005 and 2006. Since 2006, the camp has been reopened to support surface exploration and progressive reclamation activities in 2012, 2014, 2018 and 2019. Blue Star Gold Corp. (Blue Star) acquired the Project from Bonito Capital Corp. and is now responsible for activities associated with the Project, including the implementation of the approved Interim Closure and Reclamation Plan (the plan). This plan describes the procedures for progressive reclamation and temporary closure, and outlines considerations for future final closure at the Project. The plan provides details of Blue Star's near-term plan to recommence exploration, progressively reclaim the site to support exploration activities, yet allow for potential future mine development.

This memorandum presents the basis of costing for the plan found in Attachment 1.

2 Estimate Structure

It is stated in the water license that Blue Star shall provide the Nunavut Water Board with an updated estimate of the Ulu Gold Project restoration liability using the most recent version of RECLAIM, it's equivalent or other similar method approved by the Nunavut Water Board (WL no. 2BM-ULU2030). The cost estimate was prepared in a Microsoft Excel workbook with the following worksheets:

- "Cost Estimate", a worksheet presenting all costs.
- "Quantities", a worksheet summarising all quantities utilized in the cost estimate.
- "Task Unit Costs", a worksheet illustrating the calculations for cost per unit quantity based on the labour, equipment and materials required to complete the task. This sheet is broken down into four categories, Relocations, Earthworks, Construction/Demolition and Other.
- "Unit Costs", a worksheet summarising all other unit costs utilized for the cost estimate.

- “Equipment Rates Building”, a worksheet illustrating the components utilized when building the equipment hourly rates.

The methods used by SRK and RECLAIM to estimate costs are similar. Both models are based on the same facilities, use the same quantities, unit rates and indirect costs. The methods differ by how this information is organized within the spreadsheets. The SRK cost estimate was accepted by the relevant parties as an adequate alternative to RECLAIM.

Closure costs are apportioned to water or land to reflect the portion of the closure liability that is accounted for under the Nunavut Water Board Water licences or the land use licences issued by the Kitikmeot Inuit Association. The split between land and water closure liability is open to interpretation.

3 Unit Costs

3.1 Equipment Rates

Existing equipment on site will be used for all reclamation activities. Rates for the equipment are built utilizing the following components:

- Ownership costs (zero costs due to mine owned equipment).
- Mechanical (shared cost of a red seal mechanic per four items of large equipment).
- Fuel consumption (as per best fit equipment in the CAT Performance Handbook).
- Operators costs (adopted contractor rates on Northern site).

Overhead costs for equipment, in addition to the on-site mechanic, such as ground engaging tools (GET), tires and major maintenance required to complete the plan are accounted for as a contingency cost; see Section 4.2. This is due to the level of uncertainty in the equipment condition.

3.2 Labour Rates

Labor rates are adopted from contactor rates on a northern site. The labour rates do not include the costs of camp accommodation or travel to and from site; this is included as indirect costs for camp operations.

3.3 Material and Service Provider Costs

Estimates of costs related to service providers and materials were obtained from the following sources:

- Specific vendor quotes; and
- Recent SRK experience on other projects in northern Canada.

3.4 Task Unit Rates

The “Task Unit Costs” worksheet calculates labor, material, equipment costs per unit quantity for various tasks. Determination of the construction fleet and productivities were obtained based on the following resources:

- Equipment specifications obtained from manufacturer’s data, in this case the Caterpillar Handbook (CAT),
- RSMeans data online, and
- Recent SRK experience on other projects in northern Canada.

“Labour Cost Per Unit Excluding Operators”, “Material Cost Per Unit” and “Equipment Cost Per Unit” ($/Unit) are calculated as the sum of costs divided by the task productivity (Unit/hr).

Relocation and Earthworks Costs

Relocations and earthwork unit costs are the costs associated with loading, hauling and dumping of materials, and if applicable placement and compaction of the relocated materials. Calculations make use of equipment specification obtained from manufacture’s data, in this case the Caterpillar Performance Handbook, labor and equipment unit rates described in the Section 3.

Majority of the relocations occur in and around the Ulu camp; less than 500 m. Tasks where importing of borrow material is required, a general haul route profile was assumed and the required materials could be obtained within 3 km. Load and haul operations to utilise a front-end loader (CAT 966D) or excavator (CAT 311) as the loading tool and a maximum of two haul trucks (CAT 769C).

3.5 Quantities

Quantity estimates needed as input to the cost estimates were derived using standard engineering calculations based on topographic maps, drone survey, aerial photographs and other photographs.

Further details related to quantities can be found in the plan, Source/Comments column of the costing “Quantities” worksheet and/or Table 1 and Table 2 in Section 4.

4 Basis of Estimate

4.1 Direct Costs

Table 1 provides a summary of the major direct cost inputs and assumptions.

Table 1 Direct costs inputs and costing assumptions

Item	Inputs and Assumptions
Building Demolition	• All buildings to be dismantled/demolished for disposal in the non-hazardous waste landfill. The core shack was not included as the exploration activities intend on using the building. • Dimensions, volume, of buildings and infrastructure were obtained from the 2019 lidar data provided by Blue Star. The demolition volume was estimated using the total volume of buildings and infrastructure at Ulu camp. The workshop was assumed to have a height of 3 m for the volume calculation due to the large void within the weather haven. • The RSmean 02116130100 of 569 m³/day was selected as the productivity for demolition of steel structures. Demolition unit cost includes the use of a front end loader or dozer with associated general labour and supervision.
Non-Hazardous Waste Landfill	• Waste volumes were estimated using lidar data and waste survey provided by the previous project owners. • Cover materials quantities provided in the facility design drawings (AutoCAD).
Soil Treatment Facility (STF)	• Petroleum Hydrocarbon-contaminated (PHC) material quantity provided from the soil investigation conducted by SRK in 2019. • Liner installation costs provided by A&A technical services quotation (supply and installation) • Facility earthworks assumed 60% of material requirements are sourced locally (<1 km from STF) and 40% sourced from alternative location (>1 km from STF). Load and haul rates based on two haul trucks and a loading tool (excavator or front end loader). • Costing based on design memorandum and drawings (AutoCAD).
Ore Management	• 1,850 m³ of ore identified by previous project owners on surface to be placed within an existing lined facility (underground sump)
Mine Workings	• If required placement of sea cans as temporary portal cover. • Fabrication and installation of the steel vent raise cover include a Labourer, Welder, Supervisor, Engineer and excavator completed over a duration of one week.
Hazardous Material Management	• Hazardous material quantities estimated using photographic survey identifying drums and totes, all drums and totes are assumed full of hazardous material for removal from site (70 m^3). In addition, contaminated esker identified on workshop floor in 2019 investigations (assumed to be 40 m³) will also be removed and disposed of off site. • Costs for treatment of hazardous waste off site supplied by KBL Environmental Ltd.

Item	Inputs and Assumptions
	• Removal from site will be done by means of backhaul on incoming fuel flights.
Borrow and Quarry	• Recontouring of esker borrow assumed to take 3 days.
Construction Material Transport to Site	• Transport of liner to site based on recommendation provided by Buffalo Airways Ltd.

4.2 Indirect Costs

Indirect costs were defined as any costs that cannot be directly associated with individual tasks.

Many of the indirect costs depend on the project duration, the short-term reclamation activities (STF operations) were based on 5-year durations and the long-term monitoring and reporting was based on a 10-year water license.

Table 2 provides a summary of the major indirect cost inputs and assumptions.

Table 2 Indirect costs inputs and costing assumptions

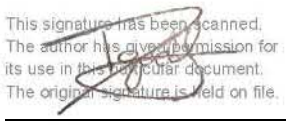
Item	Inputs and Assumptions
Mobilization	• The mobilization and camp operations costs are based on previous project owner costs for reclamation activities and an allowance for minor equipment repair. These include salary/wage, transport, food and general supplies for a team comprising of a Camp Manager, General Foreman, Cooks, General Labourers and a Bear Monitor. Cost supplied by Blue Star. • The total costs for mobilization and camp operations are shared between the interim closure and reclamation activities (45% of total) and exploration activities (55% of total). • Equipment mobilization was not necessary as all equipment planned for use are on site with no additional equipment planned. A mechanical allowance of $80,000.00 (see contingency below) was agreed for mechanical upgrades to 4 items of large equipment. • Annual camp closure includes 3 days for a team of three employees for camp closure.
Waste Rock ML/ARD Investigation	• Costing based on one week staff consultant fieldwork and associated reporting. • Blue Star excavator team conducting test pit program.
Monitoring and Reporting	• Blue Star will utilize the exploration team resources to adhere to the water license (WL no. 2BM-ULU2030) requirements for annual monitoring. Exploration is scheduled to commence concurrently with reclamation activities. • Annual visual inspection of the project infrastructure to be completed by STF operations teams for the initial 5-year period followed by the exploration team supervision and/or annual Geotechnical inspection team for 5 years thereafter; total of 10 years visual inspection of facilities. • Annual geotechnical inspection; 10-year duration. Investigation includes site inspection and reporting.

Item	Inputs and Assumptions
Management and QA/QC	• On-site engineering supervision for landfill and STF construction (as per SRK proposal to conduct engineering support for Landfill and STF). • Survey requirements (initial layout and as built survey).
Bonding and Insurances	• 1% indirect percentage add-on costs as per RECLAIM.
Health and Safety	• 1% indirect percentage add-on costs as per RECLAIM.
Project Management	• 5% indirect percentage add-on costs as per RECLAIM. • Project management includes costs for staffing to provide on-site management of the contractor to ensure the project is implemented as per plan.
Engineering	• 5% indirect percentage add-on costs as per RECLAIM. • The costs associated with site visits, sample analysis, and reporting are included in this item.
Contingency	• 20% indirect percentage add-on costs as per RECLAIM. • Additional $320,000.00 for large equipment repair/rebuild added ($80,000.00 per item of large equipment required to complete the plan).

This memorandum, Basis of Estimate for Ulu Gold Project Interim Closure and Reclamation Plan, was prepared by SRK Consulting (Canada) Inc.

Regards,

SRK Consulting (Canada) Inc.



Darryl Godley
Consultant

Reviewed by

Mark Liskowich, PGeo
Principal Consultant

5 References

Blue Star 2020. Interim Closure and Reclamation Plan for Ulu Gold Project, Blue Star Gold Corp. March 2020.

CAT. Caterpillar Performance Handbook 48. A publication by Caterpillar, June 2018.

RSMean. RSMeans from Gordian Version 8.7, accessed July 2020, <https://www.rsmeansonline.com/>

Attachment 1 – Interim Closure and Reclamation Plan Costing (Appendix C in the Interim Closure and Reclamation Plan)

COST ESTIMATE

Task	Qnty	Unit	Unit Rate	Cost	Total
1. DIRECT COSTS					
1.1 Building Demolition					**$33,490.77**
Demolition of Existing Weather Havens					
Demolition of Ulu Camp	4,569	m³	$7.33	$33,490.77	
1) Disposal of waste accounted for under Section 1.2 Non-Hazardous Landfill *2) Decommissioning of electrical and mechanical accounted for in camp costs*					
1.2 Non-Hazardous Waste Landfill					**$287,597.16**
Existing Waste Handling					
Transport to Facility (Load and Haul)	6,900	m³	$9.98	$68,862.00	
Transport to Facility (Utilizing Dozer Push/Pull)	4,600	m³	$6.68	$30,728.00	
Placement/Packing in Facility (Excavator/Front End Loader/Dozer)	11,500	m³	$2.27	$26,105.00	
Additional Waste Handling					
Transport Ulu Camp Demolition Waste to Facility (Load and Haul)	1,142	m³	$9.98	$11,399.66	
Transport Additional Waste to Facility - esker, equipment etc. (Load and Haul)	3,400	m³	$9.98	$33,932.00	
Placement/Packing in Facility (Excavator/Front End Loader/Dozer)	4,542	m³	$2.27	$10,310.91	
Closure					
Intermediate Cover (Load, haul and place)	2,485	m³	$8.79	$21,843.15	
Final Cover (Load, haul and place)	3,130	m³	$16.16	$50,580.80	
Contouring of Cover Material	5,615	m³	$2.27	$12,746.05	
Water Management					
Drainage Contouring/Sloping Around Facility Perimeter	480	m³	$2.27	$1,089.60	
Allowance (Pumping, diversion trenching etc.)	1	ea	$20,000.00	$20,000.00	
1.3 Soil Treatment Facility					**$517,773.30**
Facility Earthworks					
Foundation and Berm Construction - Dozer	9,173	m³	$1.69	$15,502.54	
Foundation and Berm Construction - Excavator & Truck	6,115	m³	$15.96	$97,601.78	
Bedding Placement	845	m³	$11.14	$9,407.73	
Liner Cover Placement	2,252	m³	$11.14	$25,087.28	
Liner Installation					
Geotextile and LLDPE Installation	6,756	m²	$15.00	$101,340.00	
Material Sorting and Placement					
Sorting of PHC Contaminated Material	6,000	m³	$7.91	$47,460.00	
Load and Haul to Facility	4,000	m³	$8.79	$35,160.00	
Placement in STF Facility	4,000	m³	$11.14	$44,560.00	
Monitoring					
Baseline and Post Closure PHC Contamination Testing	10	ea	$176.75	$1,767.50	
Operational PHC Contamination Testing	123	ea	$98.78	$12,149.94	
Water Quality Sampling	38	ea	$169.30	$6,433.40	

COST ESTIMATE

Task	Qnty	Unit	Unit Rate	Cost	Total
Annual Operations					
Tilling/mechanical turning of material 2020	16	days	$1,602.30	$25,636.80	
Material Removal 2021	2,400	m³	$11.14	$26,736.00	
Material Transfer/Placement 2021	800	m³	$11.14	$8,912.00	
Material Removal 2022	800	m³	$11.14	$8,912.00	
Material Transfer/Placement 2022	800	m³	$11.14	$8,912.00	
Material Removal 2023	800	m³	$11.14	$8,912.00	
Material Transfer/Placement 2023	800	m³	$11.14	$8,912.00	
Material Removal 2024	800	m³	$11.14	$8,912.00	
Closure					
Liner removal	5,630	m²	$0.91	$5,123.30	
Levelling of Facility Berms	6,115	m³	$1.69	$10,335.03	
1.4 Ore Management					**$80,410.72**
Repair of Mine Sump					
Remove of Mineralised Material in Sump Berms	50	m³	$2.27	$113.50	
Load and Haul Material for Sump Berms	50	m³	$15.96	$798.00	
Placement of Material for Sump Berms	50	m³	$2.27	$113.50	
Replace Base Liner System	680	m²	$15.00	$10,200.00	
Ore Placement in Mine Sump					
Load and Haul Ore in Mine Sump	1,850	m³	$15.96	$29,526.00	
Placement of Ore in Sump	1,850	m³	$11.14	$20,609.00	
Cover					
Liner Cover	1,040	m²	$15.00	$15,600.00	
Esker Sand Cover Load and Haul to Sump	312	m³	$8.79	$2,742.48	
Esker Sand Placement and Contouring	312	m³	$2.27	$708.24	
1.5 Mine Workings					**$55,760.32**
Portal Cover (Allowance)					
Placement of Temporary Barrier (Sea Cans)	1	allow	$1,309.76	$1,309.76	
Steel Vent Raise Cover (Allowance)					
Engineering Design	1	allow	$23,360.00	$23,360.00	
Fabrication and Installation of Steel Vent Cover	1	allow	$31,090.56	$31,090.56	
1.6 Hazardous Material Management					**$55,491.59**
Hazardous Materials					
Treatment of Hazardous Material on site (Allowance)	1	allow	$7,000.00	$7,000.00	
Treatment of Hazardous Material Removed from Site	110	m³	$260.00	$28,600.00	
Hydrocarbon Contaminated Material Initial Earthworks and sampling					
Dozer work ripping frozen ground	6,000	m³	$1.69	$10,140.00	
PHC Contamination sampling	81	ea	$120.39	$9,751.59	

COST ESTIMATE

Task	Qnty	Unit	Unit Rate	Cost	Total
1.7 Borrow & Quarry					**$4,806.90**
Contouring of Borrow Area(s)					
Contouring of Esker Borrow Area	3	days	$1,602.30	$4,806.90	
1.8 Construction Material Transport to Site					**$39,418.49**
Liner					
Soil Treatment Facility Liner	9,323	kg	$3.37	$31,419.45	
Mine Sump and Ore Management Liner	2,374	kg	$3.37	$7,999.03	
				SUBTOTAL - DIRECT COSTS	**$1,074,749.25**
2. INDIRECT COSTS					
2.1 Mobilization					**$421,140.00**
Mobilization	1	ea.	$148,500.00	$148,500.00	
Camp Operations	1	ea.	$198,000.00	$198,000.00	
Miscellaneous Small Camp Equipment Rebuild/Repair	1	ea.	$30,000.00	$30,000.00	
Annual Camp Closure (Temporary closure: Buildings, Storage Facilities, Mobile Equipment and Waste Management during STF operations)	4	years	$11,160.00	$44,640.00	
2.2 Waste Rock ML/ARD Investigation					**$43,418.35**
Site Investigation and Reporting					
Transport and Accommodation	1	ea	$3,000.00	$3,000.00	
Consultant Fieldwork	84	hrs	$167.00	$14,028.00	
Test Pits (Excavator)	5	days	$1,379.60	$6,898.00	
Laboratory Testing	37	ea	$256.55	$9,492.35	
Reporting	1	ea	$10,000.00	$10,000.00	
2.3 Monitoring and Reporting					**$205,539.34**
Annual Visual Inspections (Landfill and STF)					
Visual Inspection of STF and Landfill	5	years	$2,820.00	$14,100.00	
Annual Geotechnical Inspection					
Field Inspection and Technical Report	10	Years	$17,848.00	$178,480.00	
Water Quality Laboratory Testing					
Water Quality Laboratory Testing	86	ea	$150.69	$12,959.34	
2.4 Management and QA/QC					**$145,600.00**
Survey					
Survey Control STF and Landfill	4	day	$2,400.00	$9,600.00	
Transport to/from Site	2	allow	$3,000.00	$6,000.00	

COST ESTIMATE

Task	Qnty	Unit	Unit Rate	Cost	Total
Construction Oversight					
Consulting (Construction Support STF and Landfill)	1	ea	$130,000.00	$130,000.00	
2.5 Bonding/Insurance					**$10,747.49**
Bonding/Insurance	1%	of direct costs	$1,074,749.25	$10,747.49	
2.6 Health and Safety					**$10,747.49**
Health and Safety	1%	of direct costs	$1,074,749.25	$10,747.49	
2.7 Project Management					**$53,737.46**
Project Management	5%	of direct costs	$1,074,749.25	$53,737.46	
2.8 Engineering					**$53,737.46**
Engineering	5%	of direct costs	$1,074,749.25	$53,737.46	
2.9 Contingency					**$534,949.85**
Contingency	20%	of direct costs	$1,074,749.25	$214,949.85	
Large Equipment Rebuild/Repair	4	ea.	$80,000.00	$320,000.00	
				SUBTOTAL - INDIRECT COSTS	**$1,479,617.45**
				SUBTOTAL - DIRECT COSTS	**$1,074,749.25**
				TOTAL	**$2,554,366.70**

Notes: Direct/Indirect costs based on Contaminated Sites Program, Natural Resources and Environment Branch, Northern Affairs Program, Indian and Northern Affairs Canada. 2006. Contaminated Sites Cost Estimating Guide, October 23, 2006

QUANTITIES

Item	Quantity	Units	Source/Comment
LANDFILL			
Total Non-Hazardous Waste	11,500	m³	Site Inspection with Lidar 2019 incl 30% contingency. Mandalay Supplied volumes 2018 reviewed
Allocated to Load and Haul to Facility	6,900	m³	Allocated 60% total waste
Allocated to Dozer Push/Pull to Facility	4,600	m³	Allocated 40% total waste
Total Material to be Packed/Placed in Facility	11,500	m³	Site Inspection with Lidar 2019 incl 30% contingency. Mandalay Supplied volumes 2018 reviewed
Intermediate Cover	2,485	m³	Landfill Design Drawing
Final Cover	3,130	m³	Landfill Design Drawing
Boundary Contouring (Water Management)	480	m³	Estimated
SOIL TREATMENT FACILITY			
Foundation and Berm Construction	15,289	m³	STF design drawings
Allocated to dozer work	9,173	m³	60% of total volume
Allocated to Load and Haul	6,115	m³	40% of total volume
Liner System Area	5,630	m²	SF design drawings
Liner System Area	6,756	m²	STF design drawings + 20% for overlap
Liner Weight	9,323	kg	Tech Spec Sheets (SKAPS and Solmax)
Bedding	845	m³	STF design drawings
Liner Cover	2,252	m³	STF design drawings
In Situ PHC Contaminated Material for initial excavations	6,000	m³	Results of 2019 Contaminated Soil Investigation at Ulu Gold Project
PHC Contaminated Material (Initial for sorting)	6,000	m³	Results of 2019 Contaminated Soil Investigation at Ulu Gold Project
PHC Contaminated Material (STF Treatment)	4,000	m³	Results of 2019 Contaminated Soil Investigation at Ulu Gold Project
Tilling of material 2020	16	days	8 weeks @ 2 days per week
Annual Treated Soil Removal 2021	2,400	m³	Estimated. Total treatment after one full season of mechanical turning.
Annual Treated Soil Placement 2021	800		Estimated. Placed 0.5m thick in larger cell for treatment without mechanical turning. Conservative approach.
Annual Treated Soil Removal 2022	800	m³	Estimated
Annual Treated Soil Placement 2022	800	m³	Estimated. Placed 0.5m thick in larger cell for treatment without mechanical turning. Conservative approach.
Annual Treated Soil Removal 2023	800	m³	Estimated
Annual Treated Soil Placement 2023	800	m³	Estimated. Placed 0.5m thick in larger cell for treatment without mechanical turning. Conservative approach.
Annual Treated Soil Removal 2024 (allowance for additional PHC contaminated material)	800	m³	Estimated
Baseline and post-closure sampling	10	units	SRK Estimate
Operations soil sampling	123	units	SRK Estimate
Water quality sampling	38	units	SRK Estimate
OTHER PROGRESSIVE RECLAMATION ACTIVITIES			
Total Contaminated Material for Removal from Site	110	m³	Site photos and Results of 2019 Contaminated Soil Investigation at Ulu Gold Project
Contouring of Sand (Esker) Borrow Source	3	days	Estimated
Ore Management			
Ore volume	1,850	m³	Reported by previous owner
Mine sump berm repair	50	m³	Assumed remove and replace
Mine Sump floor liner	680	m²	Sump dimension of 30mx15m - 25% additional for overlap
Ore Liner Cover	1,040	m²	Cover based on a 4m high ore pile
Esker Cover	312	m³	0.3m cover
Liner Weight	2,374	kg	Tech Spec Sheets (SKAPS and Solmax). Geotextile 0.64kg/m² and LLDPE 0.74/kg.
Sampling Program			
Seep water quality	86	unit	SRK Estimates
ML/ARD Investigation	27	unit	SRK Estimate
Borrow Investigation	10	unit	SRK Estimate if required
PHC Contamination Initial Sampling	81	unit	SRK Estimate
Additional Waste			
Additional Non-Hazardous Waste	3,400	m³	Estimate for additional equipment and PHC material allocated to landfill
Remaining building demolition (excl core shack)	1,720	m²	Drone Image 2019
Remaining building demolition (excl core shack)	4,569	m³	Global Mapper. Workshop assumed 3m height due to large interior void.
Demolition waste for landfill	1,142	m³	Global Mapper - assumed 75% reduction in volume. Burning of material where possible.
Total Duration	10	years	Water License duration
Visual Inspection Duration	5	years	No. of years after Progressive Reclamation activities are completed
Annual camp closures	4	years	4 years of STF operations

TASK UNIT COSTS

			Rates				
Item	Unit	Productivity (unit/hr)	Total Unit Cost	Labour Cost Per Unit, excluding operators ($/Unit)	Material Cost Per Unit ($/Unit)	Equipment Cost Per Unit ($/Unit)	Remark / Source
Relocations							
Waste Rock: load, haul <1km	**m³**	**30**	**$ 15.96**	$ 1.07	$ -	$ 14.89	Estimated assisted by SRK Production Estimator
Sand: load, haul <1km	**m³**	**57**	**$ 8.79**	$ 0.56	$ -	$ 8.23	SRK Production Estimator 0.5km haul
Sand: load, haul >1km	**m³**	**31**	**$ 16.16**	$ 1.03	$ -	$ 15.13	SRK Production Estimator 3km haul
Debris: load, haul, dump <1km	**m³**	**40**	**$ 9.98**	$ 2.68	$ -	$ 7.31	Assumed Production
Debris: dozer push/pull	**m³**	**40**	**$ 6.68**	$ 2.68	$ -	$ 4.01	Assumed Production
Earthworks							
Dozer general works	**m³**	**152**	**$ 1.69**	$ 0.63	$ -	$ 1.06	RSmean 3123164622000 (45m haul) 65% utilization over a 10 hour shift
Sand Sorting (PHC Contaminated sorting)	**m³**	**60**	**$ 7.91**	$ 2.67	$ -	$ 5.24	Assumed rate to test and sort PHC contaminated material 50m haul.
Sand Placement	**m²**	**29**	**$ 11.14**	$ 5.57	$ -	$ 5.57	RSMeans 312323160200
Waste Placement & Compaction	**m³**	**202**	**$ 2.27**	$ 0.79	$ -	$ 1.48	SRK Excavator productivity Estimator 65% Utilization
Sand Sloping/Contouring/Shaping	**m³**	**202**	**$ 2.27**	$ 0.79	$ -	$ 1.48	SRK Excavator productivity Estimator 65% Utilization
Construction/Demolition							
Vent Raise Cap	**ls**	**1**	**$ 31,090.56**	$ 26,124.00	$ -	$ 4,966.56	5 day task
Vent Raise Eng Design	**ls**	**1**	**$ 23,360.00**	$ 13,360.00	$ -	$ 10,000.00	Assumption
Demolition of building (Steel)	**m³**	**57**	**$ 7.33**	$ 4.52	$ -	$ 2.82	RSMean 024116130100 (569m³/day)
Portal Temporary Barrier	**ls**	**1**	**$ 1,309.76**	$ 482.00	$ -	$ 827.76	Surveyor Including Equipment
Other							
Survey	**day**	**1**	**$ 2,004.00**	$ 2,004.00	$ -	$ -	Surveyor Including Equipment
Liner removal	**m²**	**100**	**$ 0.91**	$ 0.75	$ -	$ 0.16	Assumed production
Annual Visual Inspection	**ls/yr**	**1**	**$ 2,820.00**	$ 2,820.00	$ -	$ -	Exploration team to conduct inspections for Blue Star
Annual Geotechnical Inspection - Field Inspection	**ls/yr**	**1**	**$ 17,848.00**	$ 7,848.00	$ -	$ 10,000.00	
Annual Camp Closure	**ls/yr**	**1**	**$ 11,160.00**	$ 11,160.00	$ -	$ -	
ML/ARD Investigation	**ls**	**1**	**$ 25,000.00**	$ -	$ -	$ -	Allowance

EQUIPMENT AND LABOUR RATES

EQUIPMENT RATES

Model	Units Available	Equipment Rate, including Operator and Fuel ($/hour)	Source/Comments
Dozer			
CAT D8	hr	**$160.23**	SRK Constructed. Incl. Operator, fuel and mechanic. No capital costs.
CAT D8	day	**$1,602.30**	Daily Cost (10 hour shift)
Excavator			
CAT 311	hr	**$137.96**	SRK Constructed. Incl. Operator, fuel and mechanic. No capital costs.
CAT 311	day	**$1,379.60**	Daily Cost (10 hour shift)
Grader			
CAT 140	hr	**$138.65**	SRK Constructed. Incl. Operator, fuel and mechanic. No capital costs.
Truck			
CAT 769C	hr	**$154.43**	SRK Constructed. Incl. Operator, fuel and mechanic. No capital costs.
Misc. Equipment	**Unit**	**Rate**	**Source/Comments**
C-46 Cargo Aircraft	ea	**$15,000.00**	Client Supplied
C-46 Cargo cost per kg	$/kg	**$2.59**	C-46 cargo 5800kg
C-46 Cargo cost per kg (factored)	$/kg	**$3.37**	30% contingency added due to aircraft volumetric allowances
Water Pump 2"	ea	**$850.00**	Xylem Super 8

LABOUR RATES

Designation	Units Available	Rate	Source/Comments
Labour			
General Labour	hr	**$75.00**	SRK Project Experience - contractor rates on northern site, adjusted for inflation
Supervision	hr	**$160.00**	SRK Project Experience - contractor rates on northern site, adjusted for inflation
Trades -Mechanical, Welder, Electrician etc.	hr	**$109.00**	SRK Project Experience - contractor rates on northern site, adjusted for inflation
Engineering Consultant	hr	**$167.00**	Estimated
Heavy Equipment Operator	hr	**$85.00**	SRK Project Experience - contractor rates on northern site, adjusted for inflation
Survey Crew (surveyor, helper and equipment)	day	**$2,400.00**	Estimated ($200/hour *12 hours/day)
Construction Support (Consulting)	ea	**$130,000.00**	SRK Proposal 1CB041.001

OTHER RATES

Item	Units Available	Rate	Source/Comments
Fuel			
Diesel Fuel	litre.	**$1.16**	Client supplied.
Mobilization			
Transportation and general supplies	allow	**$148,500.00**	Client Supplied, based on pervious mine owner operational costs, all inclusive.
Camp Running Costs	allow	**$198,000.00**	Client Supplied, based on pervious mine owner operational costs, all inclusive.
Equipment mechanical work/rebuild	ea.	**$80,000.00**	CAT Inspection confirming equipment "in good shape" not trusted, visual inspection only. Allowance value specified by client
Miscellaneous mechanical work (Generators, LDV, pumps etc.)	allow	**$30,000.00**	CAT Inspection confirming equipment "in good shape" not trusted, visual inspection only. Allowance value specified by client
Flight and Accommodation to/from Site (per person)	ea.	**$3,000.00**	Assumption
Materials			
Liner System (Geotextile and LLDPE Liner)	m^2	**$15.00**	Supplier quotation supply and install (A&A Technical Services) - excl transport
Laboratory Testing			
Water Quality	ea.	**$150.69**	Supplier quotation (varied).
STF Water Quality	ea.	**$169.30**	Supplier quotation (varied).
ML/ARD Investigation Testing	ea.	**$256.55**	Supplier quotation (varied).
STF Baseline Soil Sampling	ea.	**$176.75**	Supplier quotation (varied).
STF Operational Sampling	ea.	**$98.78**	Supplier quotation (varied).
STF Initial Excavation Sampling	ea.	**$120.39**	Supplier quotation (varied).
Borrow Investigation Sampling	ea.	**$223.30**	Supplier quotation (varied).
Hazardous Material Treatment			
Treatment of Hazardous Material/Contaminated Soils (Off Site)	m^3	**$260.00**	Supplier quotation (KBL) including transport from Yellowknife airport.
Allowances			
Water Management	allow	**$20,000.00**	Allowance for pumps, hoses, trenching etc.
Technical Memorandum/Report	ea.	**$10,000.00**	Assumption
Hazardous Material Treatment (On Site)	allow	**$7,000.00**	Allowance specified by client

EQUIPMENT RATE BUILDING

Equipment	Total $/hr	Operator rate/hr	Fuel cost/hr	Mechanical Costs	Fuel consumption/hr	Reff machine	Comment
Dozer	$160	$84	$37	$39	32	D8R	Fuel consumption high value CAT handbook ed 29
Excavator	$138	$84	$15	$39	13	311DRR	Fuel consumption high value CAT handbook ed 30
Truck	$154	$84	$31	$39	27	770G	Fuel consumption high value CAT handbook ed 31
Grader	$139	$84	$16	$39	13	140K	Fuel consumption high value CAT handbook ed 32
Loader	$160	$84	$37	$39	32	996 Series 2	Fuel consumption high value CAT handbook ed 33

Notes:

Mechanical Costs - Mechanic full work day of 12 hours shared over 4 pieces of equipment assumed to run 70% of the time (8.4hrs/day).

No capital costs included due to mine owned equipment