



[sign]CurrentDate
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Tracking Number:

Authorization Number: 110602

REGISTERED MAIL

BW Gold Ltd.
Suite 2600 - Three Bentall Centre,
595 Burrard Street, PO BOX 49314,
Vancouver, BC, V7X 1L3

Dear Permittee:

Enclosed is Permit 110602 issued under the provisions of the *Environmental Management Act*. Your attention is respectfully directed to the terms and conditions outlined in the permit. An annual fee will be determined according to the Permit Fees Regulation.

This permit does not authorize entry upon, crossing over, or use for any purpose of private or Crown lands or works, unless and except as authorized by the owner of such lands or works. The responsibility for obtaining such authority rests with the ~~permittee~~ Permittee. This permit is issued pursuant to the provisions of the *Environmental Management Act* to ensure compliance with Section 120(3) of that statute, which makes it an offence to discharge waste, from a prescribed industry or activity, without proper authorization. It is also the responsibility of the ~~permittee~~ Permittee to ensure that all activities conducted under this authorization are carried out with regard to the rights of third parties, and comply with other applicable legislation that may be in force.

When a spill occurs, or there is an imminent risk of one occurring, the responsible person must ensure that it is reported in accordance with the Spill Reporting Regulation. Additional information on spill reporting requirements is available at gov.bc.ca/reportaspill

This decision may be appealed to the Environmental Appeal Board in accordance with Part 8 of the *Environmental Management Act*. An appeal must be delivered within 30 days from the date that notice of this decision is given. For further information, please contact the Environmental Appeal Board at (250) 387-3464.

Administration of this permit will be carried out by staff from the Environmental Protection Division's Regional Operations Branch. Plans, data and reports pertinent to the permit are to be submitted by email or electronic transfer to the Director, designated Officer, or as further instructed. To meet the reporting requirements in a form and

Ministry of Environment and
Climate Change Strategy

Environmental Protection
Division

Suite 325 - 1011 4th Avenue
Prince George BC V2L 3H9

Authorizations - North
Region
Telephone: (250) 565-6135
Facsimile: (250) 565-6629

manner acceptable to the Director, reports and notifications related to the administration of this permit must be submitted electronically to the following ministry email addresses:

- EnvAuthorizationsReporting@gov.bc.ca for monitoring and annual reports
- EnvironmentalCompliance@gov.bc.ca for non-compliance reports.

Please be reminded that the ~~direetor~~ Director may require the ~~permittee~~ Permittee to do one or more of the following at any time:

- repair, alter, remove, improve or add to existing works, or to construct new works, and to submit plans and specifications for works specified in this authorization.
- conduct monitoring, and may specify procedures for monitoring and analysis, and procedures or requirements respecting the handling, treatment, transportation, discharge or storage of waste.
- provide security in the amount and form, and subject to the conditions, specified by the ~~direetor~~ Director.
- conduct studies and to report information in accordance with the specifications of the ~~direetor~~ Director.
- recycle certain wastes and recover certain reusable resources, including energy potential from wastes, in accordance with the specifications of the ~~direetor~~ Director.
- submit copies of reports and notifications to specified Indigenous Groups, within specified timelines, in accordance with the specifications of the ~~direetor~~ Director.

For more information about how the Ministry will assess compliance with your permit please refer to gov.bc.ca/environmentalcompliance.

For more information about how to make changes to your permit and to access waste discharge amendment forms and guidance, please refer to gov.bc.ca/wastedischarge-authorizations.

Yours truly,

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for Director, *Environmental Management Act*
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Commented [RT1]: Suggest define or add a list of the Nations to which this applies to the glossary.



MINISTRY OF ENVIRONMENT
AND CLIMATE CHANGE
STRATEGY

PERMIT

110602

Under the Provisions of the Environmental Management Act

BW Gold Ltd.
Suite 2600 - Three Bentall Centre,
595 Burrard Street, PO BOX 49314,
Vancouver, BC, V7X 1L3

Is authorized to discharge treated stormwater effluent to ground from early stage construction activities for the Blackwater gold and silver mine located near Vanderhoof, British Columbia, subject to the requirements listed below. Contravention of any of these requirements is a violation of the *Environmental Management Act* and may lead to prosecution.

Commented [GS2]: Should it just be 'Blackwater Mine' to be consistent with the *Mines Act*?

Capitalized terms referred to in this authorization are defined in the Glossary. Other terms used in this authorization have the same meaning as those defined in the *Environmental Management Act* and applicable regulations.

Where this authorization provides that the ~~director~~ Director may require an action to be carried out, the ~~permittee~~ Permittee must carry out the action in accordance with the requirements of the ~~director~~ Director.

Contravention of any of these requirements is a violation of the *Environmental Management Act* and may lead to prosecution.

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1. AUTHORIZED DISCHARGES

1.1 Treated Stormwater Effluent to Ground

This section applies to the discharge of treated effluent from a Sediment Control Pond during Early Works to ground through an Infiltration Basin. The influent to the Sediment Control Pond is comprised of contact water from the Plant Site construction area. The site reference number for this discharge is [[EMSSiteID]]. The ~~permittee~~ Permittee must not discharge under this Authorization unless the Authorized Works are complete and fully operational.

- 1.1.1 The maximum rate of discharge is not determined.
- 1.1.2 The characteristics of the discharge must be typical of those from a sediment control pond maintained in good operating order.
- 1.1.3 The discharge is authorized from Authorized Works, which are Sediment Control Pond, Rapid Infiltration Basins, discharge pipes and related appurtenances approximately located as shown on the Site Plan.
- 1.1.4 The location of the facilities from which the discharge is authorized to originate and the point where the discharge is authorized to occur is mineral tenure numbers 509273 and 509275 (~53.1954 N 124.8821 W).

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2. GENERAL REQUIREMENTS

2.1 Maintenance of Works and Emergency Procedures

All works must be complete and intact.

The ~~permittee~~ Permittee must regularly inspect the Authorized Works and maintain them in good working order. If components of the Authorized Works have a Qualified Professional's recommended maintenance schedule, then those components must, at a minimum, be maintained in accordance with that schedule.

The ~~permittee~~ Permittee must maintain a record of inspections and maintenance of the Authorized Works and make the record available to an Officer upon request.

In the event of an emergency or other condition which prevents normal operation of the Authorized Works or leads to an unauthorized discharge, the ~~permittee~~ Permittee must take remedial action immediately to restore the normal operation of the Authorized Works and to prevent any unauthorized discharges. The ~~permittee~~ Permittee must immediately report the emergency or other condition and the remedial action that has and will be taken to the EnvironmentalCompliance@gov.bc.ca email address or as otherwise instructed by the ~~director~~ Director.

2.2 Publication of Documents

The Ministry of Environment and Climate Change Strategy publishes Regulatory Documents on its website for the purpose of research, public education and to provide transparency in the administration of environmental laws. The ~~permittee~~ Permittee acknowledges that the Province may publish any Regulatory Documents submitted by the ~~permittee~~ Permittee, excluding information that would be exempted from disclosure if the document was disclosed pursuant to a request under section 5 of the *Freedom of Information and Protection of Privacy Act*, and the ~~permittee~~ Permittee consents to such publication by the Province.

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3. OPERATIONAL REQUIREMENTS

3.1 Water Management and Pollution Control Works

The ~~permittee~~ Permittee must ensure that the plans and specifications for the Authorized Works described in Section 1.1.3 are developed by a Qualified Professional, and that the Authorized Works have been constructed in accordance with the plans and specifications before discharge commences under this authorization. The ~~permittee~~ Permittee must provide the signed plans and specifications to Ministry staff if requested.

The ~~permittee~~ Permittee must design and operate the Sediment Control Pond and the Rapid Infiltration Basins to not discharge from the spillway unless there is an event greater than the 1-in-200 10-year storm event.

3.2 Rapid Infiltration Conceptual Design and Site Investigation

The ~~permittee~~ Permittee must complete the hydrological site investigation that is outlined in the Rapid Infiltration Conceptual Design prior to the construction of the Sediment Control Pond. Information obtained during the site investigation must be used to inform the design and land area requirements for the Rapid Infiltration Basins on site. Any changes to the design of the Rapid Infiltration Basins after the site investigation is completed must be submitted to the ~~director~~ Director 60 days prior to the start of construction of the Rapid Infiltration Basins. Changes are also to be included and in the annual reclamation report for the year when the Rapid Infiltration Basins are constructed within 30 days of the completion of the site investigation.

3.3 Erosion and Sediment Control Plan (ESCP)

To minimize and control the runoff of sediments in stormwater and to manage the treatment of stormwater, the ~~permittee~~ Permittee must implement, maintain and comply with all aspects of the ESCP during the Early Works. The ESCP must be prepared by a Qualified Professional. The Plan must be submitted to the ~~director~~ Director within 30 days of the issuance of the permit. Any modifications made to the ESCP must be submitted to the ~~director~~ Director within 30 days of the modification.

The ~~director~~ Director may require the ~~permittee~~ Permittee to update the ESCP based on environmental data, public complaints, and/or any other information

Commented [RT3]: ENV – we submitted an ESCP with the permit application.

Is this requiring something that differs from the ESCP we submitted with the application? If something different, BW Gold would like to discuss timing given that construction works are some time in the future.

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obtained by Environmental Protection in connection with the mine operation and receiving environment.

3.4 **Decommissioning of the Sediment Control Pond and Rapid Infiltration Basins**

The ~~permittee~~-Permittee must develop and implement and Decommissioning Plan for the Sediment Control Pond. The Plan must be submitted to the ~~director~~ Director 90 days prior to the decommissioning of the pond. At a minimum, the Plan must include the following:

- The pump out procedure for the effluent that cannot be discharged through the primary outlet,
- The sediment dewatering procedure,
- The decommissioning of the ponds, ditches, liners and outlets.

3.4 **Visual Monitoring**

The ~~permittee~~-Permittee must visually monitor the Sediment Control Pond daily while discharging to the Rapid Infiltration Basins. The ~~permittee~~-Permittee must visually monitor the Rapid Infiltration Basins daily when there is effluent in the basins. Visual monitoring must include monitoring for adequate infiltration in the Rapid Infiltration Basins and monitoring for seepage, overland flow, and erosion in the area outside the Sediment Control Pond and Rapid Infiltration Basins. Daily inspections must be recorded and maintained on site for three years.

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4. REPORTING REQUIREMENTS

4.1 Authorship and Declarations

All documents including, but not limited to, designs, information, data, reports and plans submitted to the ~~director~~Director, must be signed by the author. All reports required to be prepared by a Qualified Professional or reports where an opinion or recommendation is expressed regarding data analysis, interpretation, assessment and/or design must also be certified by the Qualified Professional. All reports certified by Qualified Professionals must include a declaration of professional competency and a conflict of interest disclosure statement.

Declaration forms are available on the Ministry's Professional Accountability Policy webpage: <https://www2.gov.bc.ca/gov/content/environment/natural-resource-stewardship/laws-policies-standards-guidance/environmental-guidance-and-policy/professional-accountability>

4.2 Non-compliance Notification

The ~~permittee~~Permittee must immediately notify the ~~director~~Director or designate by email at EnvironmentalCompliance@gov.bc.ca or as otherwise instructed by the ~~director~~Director, of any non-compliance with the requirements of this authorization. The ~~permittee~~Permittee must immediately take remedial action to remedy any effects of such non-compliance.

The Permittee must provide the Director with written confirmation of all such non-compliance events, including available test results within 24 hours of the original notification by email at EnvironmentalCompliance@gov.bc.ca, or as otherwise instructed by the Director.

4.3 Non-Compliance Reporting

If the ~~permittee~~Permittee fails to comply with any of the requirements of this authorization, the ~~permittee~~Permittee must, within 30 days of such non-compliance, submit to the ~~director~~Director a written report that ~~and~~includes, but is not necessarily limited to, the following:

- a) An explanation of the most probable cause(s) of the noncompliance, and
- b) A description of remedial action planned and/or taken by the ~~permittee~~Permittee to prevent similar noncompliance(s) in the future.

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The ~~permittee~~ Permittee must submit all non-compliance reporting required to be submitted under this Section by email to the Ministry's Compliance Reporting Submission Mailbox (CRSM) at EnvironmentalCompliance@gov.bc.ca or as otherwise instructed by the ~~director~~ Director.

For guidelines on how to report a non-compliance or for more information visit the Ministry website:
<https://www2.gov.bc.ca/gov/content/environment/waste-management/waste-discharge-authorization/data-and-report-submissions/compliance-reporting-mailbox>.

4.5 **Annual Reporting**

The ~~permittee~~ Permittee must submit the ~~annual~~ Annual report Report from the previous year to the ~~director~~ Director within 60 days of the end of the calendar year. The ~~permittee~~ Permittee must submit the report by email to the Ministry's Routine Environmental Reporting Submission Mailbox at EnvAuthorizationsReporting@gov.bc.ca or as otherwise instructed by the ~~director~~ Director. For guidelines on how to properly name the files and email subject lines or for more information visit the Ministry website:
<https://www2.gov.bc.ca/gov/content/environment/waste-management/waste-discharge-authorization/data-and-report-submissions/routine-environmental-reporting-submission-mailbox>.

The Annual Report must include a summary outlining all the non-compliance report(s) required by Section 4.3 including any use of the emergency spillway. If no non-compliances have occurred indicate that in the report.

4.5 **Reporting to Indigenous Groups**

The ~~director~~ Director may require the ~~permittee~~ Permittee to submit copies of reports and notifications required under Section 5.3, 5.5, within timelines identified in those Sections, by electronic means to specified Indigenous Groups. The ~~permittee~~ Permittee may exclude proprietary information that may be exempt from disclosure if the report were disclosed pursuant to a request under Section 5 of the *Freedom of Information and Protection of Privacy Act*.

Commented [RT4]: As with earlier comment, suggest specify which Nations or define in the glossary.

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SITE PLAN

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Glossary

“Authorized Works”

means works -referred to in Section 1.1.3 of Permit 110602.

“Early Works”

means clearing, grubbing ditching, and site levelling at the Plant Site location and sediment and erosion control including the construction of the Sediment Control Pond.

“Facility”

means the gold and silver mine located near Vanderhoof, British Columbia.

“Officer”

means an Officer as defined by Section 1(1) of the *Environmental Management Act*.

“Plant Site”

means the approximately 15 hectare area on the area of the Blackwater Gold project Mine where surface disturbance including, but not limited to, clearing, grubbing, ditching, site levelling and sediment pond construction will occur.

“Province”

means Her Majesty the Queen in right of British Columbia.

“Qualified Professional”

means an applied scientist or technologist specializing in an applied science or technology applicable to the duty or function, including, if applicable and without limiting this, agrology, biology, chemistry, engineering, geology or hydrogeology and who:

- (i) is registered with the appropriate professional organization, is acting under that organization's code of ethics and is subject to disciplinary action by that organization,
- (ii) through suitable education, experience, accreditation and/or knowledge, may be reasonably relied on to provide advice within their area of expertise; and
- (iii) provides the completed Declaration of Competency and Conflict of Interest Disclosure Statements.

All documents submitted to the Director by a Qualified Professional must be signed by the author(s).

“Rapid Infiltration Basin”

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means the engineered structures adjacent to the Sediment Control Pond where the effluent is discharged into, contained, and allowed to infiltrate into the surficial overburden layer.

“Rapid Infiltration Concept Design”

means the Rapid Infiltration Concept for the Plant Site Sediment Collection Pond Discharge, dated April 20, 2021, prepared by Senior Engineer Carlos Penate, P.Eng with Knight Piésold Ltd.

“Regulatory Document”

means any document that the Permittee is required to provide to the Director or the Province pursuant to:

- (i) this Authorization,
- (ii) any regulation made under the *Environmental Management Act* that regulates the Facility described in this Authorization or the discharge of waste from that Facility, or
- (iii) any order issued under the *Environmental Management Act* directed against the ~~permittee~~ Permittee that is related to the Facility described in this Authorization or the discharge of waste from that Facility.

“Sediment Control Pond (SCP)”

means the engineered sediment control structure designed to manage surface water runoff and control sediment release from the plant site during Early Works. The SCP will provide controlled discharge from flows up to and above the 1-in-10-year, 24 hour storm event through a pipe.

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**PROVINCE OF BRITISH COLUMBIA
MINISTRY OF ENERGY, MINES AND LOW CARBON INNOVATION**

PERMIT

APPROVING EARLY WORKS PROGRAM

(Issued pursuant to Section 10 of the *Mines Act* R.S.B.C. 1996, c. 293)

Permit: **M-246**

Mine No: 1641022

Issued to: **BW Gold Ltd.
Suite 3083 - 595 Burrard Street
Vancouver, BC Canada
V7X 1L**

for work located at the:

Blackwater Mine

Issue Date

June XX, 2021

Approving Early Works Program

Issued at Victoria, British Columbia this XXth day of June in the year 2021.

J. Lowell Constable, P.Eng
Deputy Chief Permitting Officer
Major Mines Office

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DRAFT

PREAMBLE

The *Mines Act* Permit application, and applications for changes to approved works and conditions to Permit M-246, have been submitted to the Chief Permitting Officer, in accordance with Section 10(1) and/or 10(6) of the *Mines Act*, and Sections 10.1.2 and 10.1.18 of the Health, Safety and Reclamation Code for Mines in British Columbia (Code).

Where more than one version of information exists in the application, the most recent version shall be considered the approved version unless otherwise stated or determined by the Chief Permitting Officer.

1. Approving Early Works Program (Issued June XX, 2021)

- 1.1 Application entitled '*Blackwater Gold Project - Early Works Joint Mines Act / Environmental Management Act Permits Application*', prepared by ERM, dated February 2021.
- 1.2 Report entitled '*Rapid Infiltration Concept for the Plant Site Sediment Collection Pond Discharge*', prepared by Knight Pièsold Ltd., dated April 20, 2021.
- 1.3 Report entitled '*Appendix A - Supplemental Material to Support Early Works Permits Application*', prepared by ERM Consultants Canada Ltd., dated May 10, 2021.
- 1.4 Memorandum entitled '*Addendum to the Blackwater Project Early Works Construction Environmental Management Plan – Overburden ML/ARD Management Plan*', prepared by Lorax Environmental Services Ltd., dated April 26, 2021.
- 1.5 Report entitled '*Appendix E – Early Works Erosion and Sediment Control Plan*', prepared by Knight Pièsold Ltd., dated February 4, 2021.

Received: February 5, 2021

Publication: March 4, 2021 gazette

Referred: February 8, 2021 to MRC/MDRC

Environmental Certificate #M19-01 was issued for this project by the Environmental Assessment Office under the authority of the *Environmental Assessment Act* S.B.C. 2002, C.43 (Act), on June 21st, 2019.

This permit contains the requirements of the Ministry of Energy, Mines and Low Carbon Innovation. It also is compatible, to the extent possible, with the requirements of other provincial ministries. However, nothing in this permit limits the authority of other provincial ministries to set other conditions, or to act independently, under their respective permits and legislation.

The Blackwater Mine is located within the traditional territories of Lhoosk'uz Dené Nation (LDN) and Ulkatcho First Nation (UFN). Other components of the Project, including the existing Kluskus and Kluskus-Ootsa Forest Service Roads (FSRs) and transmission line, cross the traditional territories of Nadleh Whut'en First Nation, Saik'uz First Nation, and Stelat'en First Nation.

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Figure 1 – Permitted Mine Area	15+6

CONDITIONS

The Chief Permitting Officer hereby approves the Mine Plan and Reclamation Program as submitted in the Application(s), subject to compliance with the following conditions:

A. General

1. Compliance with *Mines Act* and Code

The Permittee shall ensure that all work is in compliance with all sections and parts of the *Mines Act* and the Health, Safety and Reclamation Code for Mines in B.C. (Code), and the Permittee shall obey all orders issued by the Chief Inspector of Mines (Chief Inspector) or their delegate.

2. Departure from Approval

The Permittee shall notify the Chief Permitting Officer in writing of any intention to depart from the Mine Plan and Reclamation Program approved under this *Mines Act* permit (M-246) to any substantial degree, and shall not proceed to implement the proposed changes without the written authorization of the Chief Permitting Officer.

3. Permit Approval

- (a) The Permittee is authorized under this permit (M-246) for development outlined in Document 1.1, including surface disturbance and works, within the area encompassing approximately 1,018.9 Ha, as outlined in Figure 1 (Permitted Mine Area), which includes management buffers around the approved disturbance. The Permittee is not approved to develop borrow sources located outside of the Permitted Mine Area.
- (b) The Permittee is not authorized under this permit (M-246) for the extraction of ore within the Permitted Mine Area (Figure 1).

4. Permit

This Permit is not transferable or assignable.

5. Maintenance of Mine

The Permittee shall maintain mine facilities and infrastructure in a manner to meet design objectives, environmental protection requirements and reclamation requirements.

Commented [JL2]: Add notice of work – 30 days prior to the commencement of construction activities...

Commented [MLBE3R2]: The notification requirement is included in D.2(a). The conditions in part A of the permit are required regardless of if works have started or not so the notification condition fits best in section D.

6. Sign-off by a Qualified Professional

Unless otherwise approved in writing by the Chief Permitting Officer or Chief Inspector, the Permittee shall ensure that all reports required to be submitted under this permit are signed by a qualified professional with applicable experience and registered in the province of British Columbia.

7. First Nations Information Sharing

Unless otherwise requested by the Chief Permitting Officer or Chief Inspector, the Permittee shall provide to the Lhoosk'uz Dené Nation, Ulkatcho First Nation all material reports and plans required to be submitted under this permit, including annual monitoring reports, results of research programs, and the Reclamation and Closure Plan.

8. Compliance Status Report

The Permittee shall track compliance status of all permit conditions and inspection orders in a form acceptable to the Chief Inspector. The Permittee shall maintain an up-to-date tracking table on site. The Permittee shall ensure that the tracking table is available at the mine site at all times and to a Mines Inspector upon request. The Permittee shall prepare and submit an annual Compliance Status report to the Chief Inspector by March 31st and shall include a summary of outstanding non-compliance issues and an action plan, to the satisfaction of the Chief Inspector, for achieving compliance.

B. Geotechnical

1. General

- (a) The Permittee shall ensure that all geotechnical designs, specifications, work plans, monitoring requirements and reports required to be prepared under section (B) are:
 - (i) Signed by a Professional Engineer and are submitted to the satisfaction of the Chief Inspector; and
 - (ii) Maintained on site and made available to any Inspector of Mines, upon request.
- (b) The Permittee shall ensure construction is completed under the supervision of a Professional Engineer and that sufficient field reviews have been conducted to ensure that facilities are built in general conformance of the design, accepted engineering practices, and the Code.
- (c) The Permittee shall ensure recommendations by a Professional Engineer, relating to health and safety, geotechnical stability, or environmental protection, are followed,

unless a suitable alternative course of action is approved in writing by a Professional Engineer.

- (d) The Permittee shall submit an Advice of Geotechnical Incident form to the Chief Inspector for any geotechnical incident that is classified as a dangerous occurrence or any other incident as described in the current EMLI Advice of Geotechnical Incident form.

2. Surface Water Ponds, Ditches, and Diversions

- (a) The Permittee shall not commence construction of surface water ponds, ditches, or diversion channels until Issued for Construction (IFC) drawings, signed by a Professional Engineer, are submitted to the Chief Inspector. This condition does not apply to temporary diversion channels required to facilitate construction.
- (b) The Permittee shall ensure that surface water ponds, ditches and diversion channels are designed to convey the design flood without overtopping, without side slope failure, and with adequate armour or lining to prevent significant erosion.
- (c) The Permittee shall ensure all surface water ponds and ditches are designed by a Professional Engineer. The Permittee shall choose the design flood with consideration of the consequence of failure and duty life of the structure. This condition does not apply to temporary diversion channels required to facilitate construction.
- (d) The Permittee shall submit an "As-Built" report to the Chief Inspector for all surface water ponds, ditches and diversion channels within 30 days of commissioning. The Permittee shall ensure that the report certifies that each facility has been constructed in accordance with the design, this permit, and applicable guidelines. This condition does not apply to temporary diversion channels required to facilitate construction.
- (e) The Permittee shall include all surface water ponds, ditches and diversion channels in an Annual Inspection Review Report of water management facilities on the mine site. The Permittee shall submit the report to the Chief Inspector by March 31st of the year following the review. This condition does not apply to temporary diversion channels required to facilitate construction.
- (f) The Permittee shall submit a Site Characterization Report for the sediment control pond dam area to the Chief Permitting Officer a minimum of 90 days prior to construction.

3. Soil, Overburden and Rock Stockpiles

The Permittee shall ensure that all soil, overburden, and rock stockpiles are constructed in accordance with designs prepared by a Professional Engineer, unless exempt in writing from the Chief Permitting Officer, and are constructed and inspected to ensure stability and erosion control is maintained.

4. Borrow Pits and Quarry Excavations

The Permittee shall ensure that borrow and quarry excavations are constructed in accordance with designs prepared by a Professional Engineer and are constructed and inspected to ensure stability and erosion control is maintained.

5. Mine Site Roads

- (a) The Permittee shall ensure that mine roads are constructed in accordance with designs prepared by a Professional Engineer and are constructed and inspected to ensure stability and erosion control is maintained.
- (b) The Permittee shall ensure that cuts and fills in excess of 6 m height (if any) are designed by a Professional Engineer.
- (c) The Permittee shall ensure that "As-Built" drawings are prepared within three months of completion. The Permittee shall ensure that the "As-Built" drawings and records are filed on-site.

C. Protection of Land and Watercourses

1. Environmental Management System

- (a) The Permittee shall implement an Environmental Management System (EMS) consisting of Environmental Management Plans (EMPs) and Standard Operating Procedures (SOPs). The Permittee shall ensure the EMS references relevant policies and establishes proactive procedures to provide direction for effective operational management and monitoring on-site.
- (b) The Permittee shall ensure the EMS is reviewed annually, revised as soon and as often as required, and made available at the mine site at all times and to an Inspector of Mines upon request. The Permittee shall ensure the findings of the annual review of the EMS are reported in the Annual Reclamation Report.

- (c) The Permittee shall ensure that mine site employees and contractors are knowledgeable and accountable to act consistently with the requirements of the EMPs and SOPs that form the EMS.

2. Environmental Site Management

- (a) The Permittee shall ensure that a qualified Environmental Site Manager is assigned.
- (b) The Permittee shall ensure that the Environmental Site Manager has the authority to implement remedial actions as may be necessary to ensure maintenance of environmental standards and permit requirements. If suspension of construction or operations occurs due to environmental concerns, the Permittee shall immediately notify the Chief Inspector.

3. Metal Leaching (ML) and Acid Rock Drainage (ARD)

(a) General

- (i) The Permittee shall ensure that all materials with the potential to generate ML/ARD are placed in a manner that minimizes the production and release of metals and contaminants to levels that assure protection of environmental quality.
- (ii) The Permittee shall ensure that, unless otherwise approved, all plans for the prediction, and if necessary, the prevention, mitigation and management of metal leaching and acid rock drainage are prepared in accordance with the *Guidelines for Metal Leaching and Acid Rock Drainage at Minesites in British Columbia* (1998).
- (iii) The Permittee shall not make changes to the criteria for ML/ARD definition, waste handling procedures, mitigation strategies, or materials monitoring program without the written approval of the Chief Inspector.

(b) Definition of Potentially ARD Generating (PAG) and Metal Leaching (ML) Materials

- (i) The Permittee shall define overburden containing solid-phase zinc concentrations > 1000 ppm as having the potential for metal leaching.
- (ii) The Permittee shall define overburden as potentially acid generating (PAG) if they have a paste pH < 6, or a rinse pH < 5, or an NP/AP < 2, where Acid Potential (AP) is calculated using sulphide sulphur and Neutralization Potential (NP) is determined using the Modified Sobek method.

(c) ML/ARD Operational Monitoring and Management

- (i) The Permittee shall implement the Overburden ML/ARD Management Plan (Document 1.4), including standard operating procedures (SOPs) as required.

(ii) Construction Materials

The Permittee shall not use PAG or ML materials for construction purposes.

(iii) Waste Rock

The Permittee shall not disturb or excavate bedrock or otherwise produce waste rock.

(d) ML/ARD Reporting

The Permittee shall ensure results of the ML/ARD analytical testwork, outlined in the Overburden ML/ARD Management Plan (Document 1.4), are reported and assessed in the Annual Reclamation Report. Any significant changes or trends shall be discussed, and implications for materials handling shall be identified.

4. Surface Water Management and Monitoring

- (a) The Permittee shall implement the surface water monitoring program in the Early Works Erosion and Sediment Control Plan (Document 1.5). The Permittee shall track changes to surface water, seepage, and groundwater quality and quantity on the mine site. The Permittee shall ensure that the program is capable of providing early warning about the onset of ARD or an increase in contaminant loading.
- (b) The Permittee shall ensure that detection limits are sufficient to compare to water quality standards and permit requirements established by the British Columbia Ministry of Environment and Climate Change Strategy.
- (c) The Permittee shall ensure that an effective QA/QC program for the surface water, groundwater and seepage monitoring programs is included and implemented as part of the Early Works Erosion and Sediment Control Plan. The Permittee shall ensure that this includes detection limits, performance criteria that define acceptable levels of precision and accuracy and reporting of any missed sampling events.
- (d) The Permittee shall ensure that monitoring results of surface water, groundwater, and seepage quality and quantity are kept up to date in a dedicated database available for review by an Inspector of Mines upon request. The Permittee shall ensure that water quality monitoring results, including interpretation of results, are reported and

assessed in the Annual Reclamation Report. The Permittee shall ensure that any significant changes or trends in water quality or quantity are discussed, and those that require additional evaluation and management are identified in the report.

5. Erosion Control and Sediment Control

- (a) The Permittee shall implement the Early Works Erosion and Sediment Control Plan (Document 1.5).
- (b) The Permittee shall ensure that the Early Works Erosion and Sediment Control Plan is reviewed annually with updates reported in the Annual Reclamation Report. The Permittee shall provide all substantive changes to the Chief Permitting Officer prior to implementation.
- (c) The Permittee shall ensure inspections are conducted at stream crossings, contact and non-contact water management structures and snow dumps daily during rain events and the snowmelt period on the mine site. Where excessive sediment laden runoff is observed, the Permittee shall implement immediate remedial action.
- (d) The Permittee shall appropriately characterize any significant releases of sediment-laden water, defined as an unauthorized discharge to the receiving environment, with respect to extent and loading, and report it to the Chief Inspector.
- (e) The Permittee shall ensure the characterization of unauthorized discharges of sediment-laden run-off shall include, at a minimum, flow, total suspended solids, turbidity, pH, conductivity, temperature, dissolved oxygen, and total and dissolved metals, of both the effluent and the receiving water.

6. Soil Salvage and Stockpiling

- (a) The Permittee shall salvage and stockpile all topsoil, overburden, and organic material including large woody debris for use in reclamation.
- (b) The Permittee shall ensure that a qualified professional monitors and directs sampling, soil salvage, segregation, and stockpiling activities on-site.
- (c) The Permittee shall ensure that materials salvaged for use in reclamation are segregated based on salvage origin and measured suitability for reclamation purposes. Prior to mixing with other sources and/or applying on-site, the Permittee shall characterize and evaluate the suitability for reclamation any materials with the potential to be contaminated.

- (d) The Permittee shall maintain an inventory of stockpiles of salvaged soil, overburden and organic matter including large woody debris specifying the locations, origins, and quantities of material. The Permittee shall report this information in the Annual Reclamation Report.
- (e) The Permittee shall protect stockpiles from erosion, degradation, and contamination through revegetation and/or other practices.
- (f) The Permittee shall ensure that stockpiles are clearly marked to ensure that they are protected during construction and mine operations.
- (g) The Permittee shall not use soil suitable for use in reclamation as fill.

7. Vegetation Management

- (a) The Permittee shall limit disturbance to vegetation to those areas approved by this permit.
- (b) The Permittee shall manage and control weeds that establish on the site and shall ensure that weeds do not migrate from the site to adjacent areas. The Permittee shall consider using non-toxic means for weed control. The Permittee shall ensure that all seed used on-site is certified weed free.
- (c) The Permittee shall avoid burning and/or disposal of woody debris suitable for use in reclamation.

8. Wildlife Protection

- (a) Pursuant to Part 1.6.9 of the Code, the Permittee shall incorporate in the mine safety program a 'no hunting and shooting' policy for the Permitted Mine Area (Figure 1).
- (b) The Permittee shall implement a policy of 'no fishing and hunting' for all employees and contractors while on company business or while commuting to and from the mine.

9. Archaeological Resources

- (a) Prior to beginning any mechanized surface disturbance on undisturbed lands, the Permittee shall conduct field surveys consistent with archaeological and cultural heritage resources management procedures consistent with the provisions of the BC Heritage Conservation Act.

- (b) For those sites that cannot be avoided, the Permittee shall contact the Archaeology Branch of the Ministry of Forests, Lands, Natural Resource Operations and Rural Development and make arrangements to scientifically excavate and record findings.

D. Reclamation and Closure Program

1. Reclamation Security

- (a) The Permittee shall cause to be deposited with the Minister of Finance, security in the amount of Nine Hundred Eighty Thousand (\$980,000.00) dollars. The Permittee shall deposit the security in accordance with the following installment schedule. The security will be held by the Minister of Finance for the proper performance of the approved program and all the conditions of this permit in a manner satisfactory to the Chief Inspector.

<u>Date</u>	<u>\$</u>	<u>Cumulative</u>
Security held as of June XX, 2021		\$0.00
By August 31, 2021	\$980,000.00	\$980,000.00

- (b) Notwithstanding the security posted as a condition of this Permit, the Permittee remains responsible for covering all closure and reclamation costs associated with reclamation and environmental protection.

s.16

2. Reclamation

- (a) The Permittee shall inform the Chief Permitting Officer when physical Early Works activities, as described in Document 1.1, have commenced. _____
- (b) The Permittee shall complete reclamation of the Blackwater Early Works Area (Figure 1), as described in Document 1.1, within 5 years of commencing physical Early Works activities.

3. Land Use

- (a) The Permittee shall ensure that the land surface is reclaimed with the intent of re-establishing average pre-mining capability to the following end land use objectives: wildlife habitat, and opportunities for traditional use of the land by the Lhoosk'uz Dené Nation and Ulkatcho First Nation.
- (b) The Permittee shall ensure that borrow pits and quarries belonging to the mine development and operations, are reclaimed by the Permittee to the approved end land use once no longer required.

4. Erosion Control

The Permittee shall achieve reduction of erosion through landform configuration, development of maintenance-free vegetation covers, and the development of stable, self-sustaining drainage control features and watercourses.

5. Re-vegetation

The Permittee shall ensure the land is revegetated to a self-sustaining state using appropriate and or native plant species including culturally important native species.

6. Growth Medium

- (a) The Permittee shall monitor soil replacement operations to ensure the minimum depths are achieved and a confirmation sampling plan shall be developed to ensure quality of soil used for reclamation purposes will achieve end land use objectives. The Permittee shall report all results in the Annual Reclamation Report.
- (b) With the exception of areas where closure plans require compaction prior to placement of growth medium in order to reduce infiltration and contact water, the Permittee shall ensure that areas to be reclaimed are decompacted to the minimum depth required to adequately address the severity of compaction prior to placement of soil and or vegetation, in a manner intended to achieve end land use objectives and erosion control.

7. Surface Water Management Ponds and Channels

The Permittee shall reclaim all surface water management ponds and water diversions to satisfy stability and erosion control requirements and the approved end land use once no longer required.

8. Mine Roads

The Permittee shall ensure all mine roads are reclaimed, in accordance with recommendations of a qualified professional, to satisfy the approved end land use objectives, including all reasonable effort to fully re-configure to conform to adjacent landscape where long-term stability is not compromised, unless permanent access is required.

Commented [JL10]: Prefer to have this removed, only native species should be used in final reclamation – if agronomics are required for slope stabilization/erosion control, then final reclamation has not been achieved

Commented [MLBE11R10]: The word 'appropriate' is in the Code and allows (for example) short term use of non-persistent species for erosion and sediment control. Completely agree that native species will be required to meet end land use. Final reclamation is assessed against end land use D.3(a); native culturally important species will be required to meet that test.

Figure 1 – Permitted Mine Area

DRAFT

From: [Emery, Kristy EMLI:EX](#)
To: [Murphy, Liz B EMLI:EX](#); [Hill, Breanne ENV:EX](#)
Cc: [Vahedifar, Mohammad EMLI:EX](#); [Dodd, Nikki EMLI:EX](#)
Subject: FW: Blackwater Gold Project Early Works - Draft Decision Package
Date: June 15, 2021 7:35:21 AM
Attachments: [image001.png](#)
[2021_06_03 M-246 Blackwater Early Works Permit DRAFT BW Gold eds.docx](#)
[2021_06_03 Environmental Management Act Effluent Permit \(DRAFT\) BW Gold eds.docx](#)

Good morning Liz and Breanne, please see attached comments from Artemis on the draft Mines Act and Effluent Discharge permits.

Mo, can you please capture the comments in the tracking table.

Nikki, Ryan has queried the inclusion of Nazco. My understanding is that they shouldn't be referenced. Can you please confirm? Note that the incorrect references to Tsilhqot'in etc., have already been updated.

Kristy Emery

Senior Project Lead
Major Mines Office | Mines Competitiveness and Authorizations Division
Ministry of Energy, Mines and Low Carbon Innovation
Office: (236) 478-3796 | Mobile: (250) 882-3898



From: Ryan Todd <rtodd@artemisgoldinc.com>
Sent: June 14, 2021 4:47 PM
To: Emery, Kristy EMLI:EX <Kristy.Emery@gov.bc.ca>
Cc: Vahedifar, Mohammad EMLI:EX <Mohammad.Vahedifar@gov.bc.ca>; Sachi De Souza <SDeSouza@artemisgoldinc.com>; JMS 2 <[s.22](mailto:JMS2@s.22)>; Anne Currie <Anne.Currie@erm.com>; nicole.bishop@erm.com
Subject: RE: Blackwater Gold Project Early Works - Draft Decision Package

[EXTERNAL] This email came from an external source. Only open attachments or links that you are expecting from a known sender.

Hi Kristy – hope you had a nice weekend.

Thanks for the opportunity to review the draft permits. Our comments are attached in track changes. We'd be happy to discuss if needed at your convenience.

Regards,

Ryan

From: Emery, Kristy EMLI:EX <Kristy.Emery@gov.bc.ca>
Sent: Friday, June 4, 2021 5:46 AM
To: Ryan Todd <rtodd@artemisgoldinc.com>; Sachi De Souza <SDeSouza@artemisgoldinc.com>; JMS 2 <s.22> ; Anne Currie <Anne.Currie@erm.com>; nicole.bishop@erm.com
Cc: Vahedifar, Mohammad EMLI:EX <Mohammad.Vahedifar@gov.bc.ca>
Subject: FW: Blackwater Gold Project Early Works - Draft Decision Package

Morning Ryan et al,

Please find attached the Draft Decision Documents Package, along with instructions for review. I've also attached the documents directly for those of you that do not have SharePoint access. Note you have previously received the EMA Effluent Discharge Permit that is also attached.

Cheers,
Kristy

Kristy Emery

Senior Project Lead
Major Mines Office | Mines Competitiveness and Authorizations Division
Ministry of Energy, Mines and Low Carbon Innovation
Office: (236) 478-3796 | Mobile: (250) 882-3898



From: Emery, Kristy EMLI:EX
Sent: June 4, 2021 5:40 AM
To: Antill, Timothy EMLI:EX <Timothy.Antill@gov.bc.ca>; 'Beverly Ketlo' <bketlo@nadleh.ca>; 'Beverly Ketlo' <s.22> ; Breanne Hill <breanne.hill@gov.bc.ca>; s.22
s.22 ; Dodd, Nikki EMLI:EX <Nikki.Dodd@gov.bc.ca>; Emery, Kristy EMLI:EX <Kristy.Emery@gov.bc.ca>; Fitzgerald, Lindsay FLNR:EX <Lindsay.Fitzgerald@gov.bc.ca>; Hall, Ryan J FLNR:EX <Ryan.Hall@gov.bc.ca>; Hold - 210401 - Heron-Herbert, Brian ENV:EX <Brian.HeronHerbert@gov.bc.ca>; 'Jackie Thomas' <jackie.thomas@saikuz.com>; 'Jessica Lowey' <jessica@keefereco.com>; Johnson, David R FLNR:EX <David.Johnson@gov.bc.ca>; 'Kasandra Turbide' <land.manager@saikuz.com>; 'Kennedy.BearRobe@gowlingwlg.com' <Kennedy.BearRobe@gowlingwlg.com>; Krauskopf, Phillip FLNR:EX <Phillip.Krauskopf@gov.bc.ca>; 'Love, Mark P ENV:EX' <Mark.Love@gov.bc.ca>; Marques, Victor EMLI:EX <Victor.Marques@gov.bc.ca>; Mathiscyk, Vahid FLNR:EX <Vahid.Mathiscyk@gov.bc.ca>; Mauer, Eamon EMLI:EX <Eamon.Mauer@gov.bc.ca>; McColl, Duncan FLNR:EX <Duncan.McColl@gov.bc.ca>; McLachlan, Mike FLNR:EX <Mike.McLachlan@gov.bc.ca>; Mergen, Tim FLNR:EX <Tim.Mergen@gov.bc.ca>; 'Micheal Keefer' <mike@keefereco.com>; Middleton, Cathy S FLNR:EX <Cathy.Middleton@gov.bc.ca>; Morse, Sarah EMLI:EX <Sarah.Morse@gov.bc.ca>; Murphy, Liz B EMLI:EX <Liz.Murphy@gov.bc.ca>; 'Nadine Charleyboy' <ncharleyboy@ulkatcho.ca>; 'Neil Gauthreau' <resources@lhooskuz.com>; Norlund, Kelsey EMLI:EX <Kelsey.Norlund@gov.bc.ca>; Northern Health <Sally.Western@northernhealth.ca>; Oke, Brian R EMLI:EX <Brian.Oke@gov.bc.ca>;

Rina Freed (rina.freed@seamining.ca) <rina.freed@seamining.ca>; Sary, Zsolt FLNR:EX <Zsolt.Sary@gov.bc.ca>; Shaw, Sean EMLI:EX <Sean.Shaw@gov.bc.ca>; Smith-Rockwell, Angela FLNR:EX <Angela.SmithRockwell@gov.bc.ca>; Tabe, Karen L AFF:EX <Karen.Tabe@gov.bc.ca>; Van Dolah, David FLNR:EX <David.VanDolah@gov.bc.ca>; van Geloven, Chelton FLNR:EX <Chelton.vanGeloven@gov.bc.ca>; Wade, Kristy ENV:EX <Kristy.Wade@gov.bc.ca>; Wolff, Gareth EMLI:EX <Gareth.Wolff@gov.bc.ca>

Cc: Vahedifar, Mohammad EMLI:EX <Mohammad.Vahedifar@gov.bc.ca>; Jen A EMLI:EX Stuart (Jen.Stuart@gov.bc.ca) <Jen.Stuart@gov.bc.ca>

Subject: Blackwater Gold Project Early Works - Draft Decision Package

Blackwater Early Works - Draft Decision Package

Comments Due June 14, 2021

Good morning Blackwater Gold Project Early Works MRC Committee Members:

I am pleased to be providing you with the Early Works Draft Decision Package for your review and comment. The Decision Package consists of the draft MRC Report, the draft *Mines Act* permit and conditions, with supporting Figure, and the draft *Environmental Management Act* Effluent Discharge permit and conditions.

MRC Action

- Review the draft documents located in the [SharePoint Decision Package Folder](#) and provide comments to me on or before **June 14, 2021**.
- If you wish to provide comments directly within the draft documents, please ensure you download the document to your computer and utilize TRACKED CHANGES while providing your comments. Alternatively, you may choose to provide your comments in the form of a memo or table.

Decision Package Timelines

MRC review and comment period draft decision package	4-Jun-21 to 14-Jun-21
MMO finalization of decision package	15-Jun-21 to 21-Jun-21
Referral of decision package to SDMs	June 22, 2021

Thank you. Please do not hesitate to contact either myself or Mo with any questions.

Kristy Emery

Senior Project Lead

Major Mines Office | Mines Competitiveness and Authorizations Division

Ministry of Energy, Mines and Low Carbon Innovation

Office: (236) 478-3796 | Mobile: (250) 882-3898



**PROVINCE OF BRITISH COLUMBIA
MINISTRY OF ENERGY, MINES AND LOW CARBON INNOVATION**

PERMIT

APPROVING EARLY WORKS PROGRAM

(Issued pursuant to Section 10 of the *Mines Act* R.S.B.C. 1996, c. 293)

Permit: **M-246**

Mine No: 1641022

Issued to: **BW Gold Ltd.
Suite 3083 - 595 Burrard Street
Vancouver, BC Canada
V7X 1L**

for work located at the:

Blackwater Mine

Issue Date

June XX, 2021

Approving Early Works Program

Issued at Victoria, British Columbia this XXth day of June in the year 2021.

J. Lowell Constable, P.Eng
Deputy Chief Permitting Officer
Major Mines Office

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DRAFT

PREAMBLE

The *Mines Act* Permit application, and applications for changes to approved works and conditions to Permit M-240, have been submitted to the Chief Permitting Officer, in accordance with Section 10(1) and/or 10(6) of the *Mines Act*, and Sections 10.1.2 and 10.1.18 of the Health, Safety and Reclamation Code for Mines in British Columbia (Code).

Where more than one version of information exists in the application, the most recent version shall be considered the approved version unless otherwise stated or determined by the Chief Permitting Officer.

1. Approving Early Works Program (Issued June XX, 2021)

- 1.1 Application entitled '*Blackwater Gold Project - Early Works Joint Mines Act / Environmental Management Act Permits Application*', prepared by ERM, dated February 2021.
- 1.2 Report entitled '*Rapid Infiltration Concept for the Plant Site Sediment Collection Pond Discharge*', prepared by Knight Pièsold Ltd., dated April 20, 2021.
- 1.3 Report entitled '*Appendix A - Supplemental Material to Support Early Works Permits Application*', prepared by ERM Consultants Canada Ltd., dated May 10, 2021.
- 1.4 Memorandum entitled '*Addendum to the Blackwater Project Early Works Construction Environmental Management Plan – Overburden ML/ARD Management Plan*', prepared by Lorax Environmental Services Ltd., dated April 26, 2021.
- 1.5 Report entitled '*Appendix E – Early Works Erosion and Sediment Control Plan*', prepared by Knight Pièsold Ltd., dated February 4, 2021.

Received: February 5, 2021

Publication: March 4, 2021 gazette

Referred: February 8, 2021 to MRC/MDRC

Environmental Certificate #M19-01 was issued for this project by the Environmental Assessment Office under the authority of the *Environmental Assessment Act* S.B.C. 2002, C.43 (Act), on June 21st, 2019.

This permit contains the requirements of the Ministry of Energy, Mines and Low Carbon Innovation. It also is compatible, to the extent possible, with the requirements of other provincial ministries. However, nothing in this permit limits the authority of other provincial ministries to set other conditions, or to act independently, under their respective permits and legislation.

The Blackwater Mine is located within the traditional territories of Lhoosk'uz Dené Nation (LDN) and Ulkatcho First Nation (UFN). Other components of the Project, including the existing Kluskus and Kluskus-Ootsa Forest Service Roads (FSRs) and transmission line, cross the traditional territories of Nadleh Whut'en First Nation, Saik'uz First Nation, and Stellat'en First Nation.

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CONDITIONS

The Chief Permitting Officer hereby approves the Mine Plan and Reclamation Program as submitted in the Application(s), subject to compliance with the following conditions:

A. General

1. Compliance with *Mines Act* and Code

The Permittee shall ensure that all work is in compliance with all sections and parts of the *Mines Act* and the Health, Safety and Reclamation Code for Mines in B.C. (Code), and the Permittee shall obey all orders issued by the Chief Inspector of Mines (Chief Inspector) or their delegate.

2. Departure from Approval

The Permittee shall notify the Chief Permitting Officer in writing of any intention to depart from the Mine Plan and Reclamation Program approved under this *Mines Act* permit (M-246) to any substantial degree, and shall not proceed to implement the proposed changes without the written authorization of the Chief Permitting Officer.

3. Permit Approval

(a) The Permittee is authorized under this permit (M-246) for development outlined in Document 1.1, including surface disturbance and works, within the area encompassing approximately 1,018.9 Ha, as outlined in Figure 1 (Permitted Mine Area), which includes management buffers around the approved disturbance. The Permittee is not approved to develop borrow sources located outside of the Permitted Mine Area.

(b) The Permittee is not authorized under this permit (M-246) for the extraction of ore within the Permitted Mine Area (Figure 1).

4. Permit

This Permit is not transferable or assignable.

5. Maintenance of Mine

The Permittee shall maintain mine facilities and infrastructure in a manner to meet design objectives, environmental protection requirements and reclamation requirements.

6. Sign-off by a Qualified Professional

Unless otherwise approved in writing by the Chief Permitting Officer or Chief Inspector, the Permittee shall ensure that all reports required to be submitted under this permit are signed by a qualified professional with applicable experience and registered in the province of British Columbia.

7. First Nations Information Sharing

Unless otherwise requested by the Chief Permitting Officer or Chief Inspector, the Permittee shall provide to the Lhoosk'uz Dené Nation, Ulkatcho First Nation, Skin Tyee Nation, and Tsilhqot'in Nation all material reports and plans required to be submitted under this permit, including annual monitoring reports, results of research programs, and the Reclamation and Closure Plan.

8. Compliance Status Report

The Permittee shall track compliance status of all permit conditions and inspection orders in a form acceptable to the Chief Inspector. The Permittee shall maintain an up-to-date tracking table on site. The Permittee shall ensure that the tracking table is available at the mine site at all times and to a Mines Inspector upon request. The Permittee shall prepare and submit an annual Compliance Status report to the Chief Inspector by March 31st and shall include a summary of outstanding non-compliance issues and an action plan, to the satisfaction of the Chief Inspector, for achieving compliance.

B. Geotechnical

1. General

- (a) The Permittee shall ensure that all geotechnical designs, specifications, work plans, monitoring requirements and reports required to be prepared under section (B) are:
 - (i) Signed by a Professional Engineer and are submitted to the satisfaction of the Chief Inspector; and
 - (ii) Maintained on site and made available to any Inspector of Mines, upon request.
- (b) The Permittee shall ensure construction is completed under the supervision of a Professional Engineer and that sufficient field reviews have been conducted to ensure that facilities are built in general conformance of the design, accepted engineering practices, and the Code.
- (c) The Permittee shall ensure recommendations by a Professional Engineer, relating to health and safety, geotechnical stability, or environmental protection, are followed, unless a suitable alternative course of action is approved in writing by a Professional Engineer.
- (d) The Permittee shall submit an Advice of Geotechnical Incident form to the Chief Inspector for any geotechnical incident that is classified as a dangerous occurrence or any other incident as described in the current EMLI Advice of Geotechnical Incident form.

2. Surface Water Ponds, Ditches, and Diversions

- (a) The Permittee shall not commence construction of surface water ponds, ditches, or diversion channels until Issued for Construction (IFC) drawings, signed by a Professional Engineer, are submitted to the Chief Inspector. This condition does not apply to temporary diversion channels required to facilitate construction.
- (b) The Permittee shall ensure that surface water ponds, ditches and diversion channels are designed to convey the design flood without overtopping, without side slope failure, and with adequate armour or lining to prevent significant erosion.
- (c) The Permittee shall ensure all water surface ponds and ditches are designed by a Professional Engineer. The Permittee shall choose the design flood with consideration of the consequence of failure and duty life of the structure.

- (d) The Permittee shall submit an “As-Built” report to the Chief Inspector for all surface water ponds, ditches and diversion channels within 30 days of commissioning. The Permittee shall ensure that the report certifies that each facility has been constructed in accordance with the design, this permit, and applicable guidelines.
- (e) The Permittee shall include all surface water ponds, ditches and diversion channels in an Annual Inspection Review Report of water management facilities on the mine site. The Permittee shall submit the report to the Chief Inspector by March 31st of the year following the review.
- (f) The Permittee shall submit a Site Characterization Report for the sediment control pond dam area to the Chief Permitting Officer a minimum of 90 days prior to construction.

3. Soil, Overburden and Rock Stockpiles

The Permittee shall ensure that all soil, overburden, and rock stockpiles are constructed in accordance with designs prepared by a Professional Engineer, unless exempt in writing from the Chief Permitting Officer, and are constructed and inspected to ensure stability and erosion control is maintained.

4. Borrow Pits and Quarry Excavations

The Permittee shall ensure that borrow and quarry excavations are constructed in accordance with designs prepared by a Professional Engineer and are constructed and inspected to ensure stability and erosion control is maintained.

5. Mine Site Roads

- (a) The Permittee shall ensure that mine roads are constructed in accordance with designs prepared by a Professional Engineer and are constructed and inspected to ensure stability and erosion control is maintained.
- (b) The Permittee shall ensure that cuts and fills in excess of 6 m height (if any) are designed by a Professional Engineer.
- (c) The Permittee shall ensure that “As-Built” drawings are prepared within three months of completion. The Permittee shall ensure that the “As-Built” drawings and records are filed on-site.

C. Protection of Land and Watercourses

1. Environmental Management System

- (a) The Permittee shall implement an Environmental Management System (EMS) consisting of Environmental Management Plans (EMPs) and Standard Operating Procedures (SOPs). The Permittee shall ensure the EMS references relevant policies and establishes proactive procedures to provide direction for effective operational management and monitoring on-site.
- (b) The Permittee shall ensure the EMS is reviewed annually, revised as soon and as often as required, and made available at the mine site at all times and to an Inspector of Mines upon request. The Permittee shall ensure the findings of the annual review of the EMS are reported in the Annual Reclamation Report.
- (c) The Permittee shall ensure that mine site employees and contractors are knowledgeable and accountable to act consistently with the requirements of the EMPs and SOPs that form the EMS.

2. Environmental Site Management

- (a) The Permittee shall ensure that a qualified Environmental Site Manager is assigned.
- (b) The Permittee shall ensure that the Environmental Site Manager has the authority to implement remedial actions as may be necessary to ensure maintenance of environmental standards and permit requirements. If suspension of construction or operations occurs due to environmental concerns, the Permittee shall immediately notify the Chief Inspector.

3. Metal Leaching (ML) and Acid Rock Drainage (ARD)

(a) General

- (i) The Permittee shall ensure that all materials with the potential to generate ML/ARD are placed in a manner that minimizes the production and release of metals and contaminants to levels that assure protection of environmental quality.
- (ii) The Permittee shall ensure that, unless otherwise approved, all plans for the prediction, and if necessary, the prevention, mitigation and management of metal leaching and acid rock drainage are prepared in accordance with the *Guidelines for Metal Leaching and Acid Rock Drainage at Minesites in British Columbia* (1998).

- (iii) The Permittee shall not make changes to the criteria for ML/ARD definition, waste handling procedures, mitigation strategies, or materials monitoring program without the written approval of the Chief Inspector.

(b) Definition of Potentially ARD Generating (PAG) and Metal Leaching (ML) Materials

- (i) The Permittee shall define overburden containing soluble metal levels (as determined by shake flask test) higher than the receiving water objectives, or containing solid-phase zinc concentrations > 1000 ppm, as having the potential for metal leaching.
- (ii) The Permittee shall define overburden as potentially acid generating (PAG) if they have a paste pH < 6, or a rinse pH < 5, or an NP/AP < 2, where Acid Potential (AP) is calculated using sulphide sulphur and Neutralization Potential (NP) is determined using the Modified Sobek method.

(c) ML/ARD Operational Monitoring and Management

- (i) The Permittee shall implement the Overburden ML/ARD Management Plan (Document 7), including standard operating procedures (SOPs) as required.

(ii) Construction Materials

The Permittee shall not use PAG or ML materials for construction purposes.

(iii) Waste Rock

The Permittee shall not disturb or excavate bedrock or otherwise produce waste rock.

(d) ML/ARD Reporting

The Permittee shall ensure results of the ML/ARD analytical testwork, outlined in the Overburden ML/ARD Management Plan (Document 1.4), are reported and assessed in the Annual Reclamation Report. Any significant changes or trends shall be discussed, and implications for materials handling shall be identified.

4. Surface Water Management and Monitoring

- (a) The Permittee shall implement the surface water monitoring program in the Early Works Erosion and Sediment Control Plan (Document 1.5). The Permittee shall track changes to surface water, seepage, and groundwater quality and quantity on the mine site. The Permittee shall ensure that the program is capable of providing early warning about the onset of ARD or an increase in contaminant loading.
- (b) The Permittee shall ensure that detection limits are sufficient to compare to water quality standards and permit requirements established by the British Columbia Ministry of Environment and Climate Change Strategy.
- (c) The Permittee shall ensure that an effective QA/QC program for the surface water, groundwater and seepage monitoring programs is included and implemented as part of the Early Works Erosion and Sediment Control Plan. The Permittee shall ensure that this includes detection limits, performance criteria that define acceptable levels of precision and accuracy and reporting of any missed sampling events.
- (d) The Permittee shall ensure that monitoring results of surface water, groundwater, and seepage quality and quantity are kept up to date in a dedicated database available for review by an Inspector of Mines upon request. The Permittee shall ensure that water quality monitoring results, including interpretation of results, are reported and assessed in the Annual Reclamation Report. The Permittee shall ensure that any significant changes or trends in water quality or quantity are discussed, and those that require additional evaluation and management are identified in the report.

5. Erosion Control and Sediment Control

- (a) The Permittee shall implement the Early Works Erosion and Sediment Control Plan (Document 1.5).
- (b) The Permittee shall ensure that the Early Works Erosion and Sediment Control Plan is reviewed annually with updates reported in the Annual Reclamation Report. The Permittee shall provide all substantive changes to the Chief Permitting Officer prior to implementation.
- (c) The Permittee shall ensure inspections are conducted at stream crossings, contact and non-contact water management structures, snow dumps, and the tailings rock storage facility daily during rain events and the snowmelt period on the mine site. Where excessive sediment laden runoff is observed, the Permittee shall implement immediate remedial action.

- (d) The Permittee shall appropriately characterize any significant releases of sediment-laden water, defined as an unauthorized discharge to the receiving environment, with respect to extent and loading, and report it to the Chief Inspector.
- (e) The Permittee shall ensure the characterization of unauthorized discharges of sediment-laden run-off shall include, at a minimum, flow, total suspended solids, turbidity, pH, conductivity, temperature, dissolved oxygen, and total and dissolved metals, of both the effluent and the receiving water.

6. Soil Salvage and Stockpiling

- (a) The Permittee shall salvage and stockpile all topsoil, overburden, and organic material including large woody debris for use in reclamation.
- (b) The Permittee shall ensure that a qualified professional monitors and directs sampling, soil salvage, segregation, and stockpiling activities on-site.
- (c) The Permittee shall ensure that materials salvaged for use in reclamation are segregated based on salvage origin and measured suitability for reclamation purposes. Prior to mixing with other sources and/or applying on-site, the Permittee shall characterize and evaluate the suitability for reclamation any materials with the potential to be contaminated.
- (d) The Permittee shall maintain an inventory of stockpiles of salvaged soil, overburden and organic matter including large woody debris specifying the locations, origins, and quantities of material. The Permittee shall report this information in the Annual Reclamation Report.
- (e) The Permittee shall protect stockpiles from erosion, degradation, and contamination through revegetation and/or other practices.
- (f) The Permittee shall ensure that stockpiles are clearly marked to ensure that they are protected during construction and mine operations.
- (g) The Permittee shall not use soil suitable for use in reclamation as fill.

7. Vegetation Management

- (a) The Permittee shall limit disturbance to vegetation to those areas approved by this permit.
- (b) The Permittee shall manage and control weeds that establish on the site and shall ensure that weeds do not migrate from the site to adjacent areas. The Permittee shall

consider using non-toxic means for weed control. The Permittee shall ensure that all seed used on-site is certified weed free.

- (c) The Permittee shall avoid burning and/or disposal of woody debris suitable for use in reclamation.

8. Wildlife Protection

- (a) Pursuant to Part 1.6.9 of the Code, the Permittee shall incorporate in the mine safety program a 'no hunting and shooting' policy for the Permitted Mine Area (Figure 1).
- (b) The Permittee shall implement a policy of 'no fishing and hunting' for all employees and contractors while on company business or while commuting to and from the mine.

9. Archaeological Resources

- (a) Prior to beginning any mechanized surface disturbance on undisturbed lands, the Permittee shall conduct field surveys consistent with archaeological and cultural heritage resources management procedures consistent with the provisions of the BC Heritage Conservation Act.
- (b) For those sites that cannot be avoided, the Permittee shall contact the Archaeology Branch of the Ministry of Forests, Lands, Natural Resource Operations and Rural Development and make arrangements to scientifically excavate and record findings.

D. Reclamation and Closure Program

1. Reclamation Security

- (a) The Permittee shall cause to be deposited with the Minister of Finance, security in the amount of Nine Hundred Eighty Thousand (\$980,000.00) dollars. The Permittee shall deposit the security in accordance with the following installment schedule. The security will be held by the Minister of Finance for the proper performance of the approved program and all the conditions of this permit in a manner satisfactory to the Chief Inspector.

<u>Date</u>	<u>\$</u>	<u>Cumulative</u>
Security held as of June XX, 2021		\$0.00
By August XX, 2021	\$980,000.00	\$980,000.00

- (b) Notwithstanding the security posted as a condition of this Permit, the Permittee remains responsible for covering all closure and reclamation costs associated with reclamation and environmental protection.

2. Reclamation

- (a) The Permittee shall inform the Chief Permitting Officer when physical Early Works activities, as described in Document 1.1, have commenced.
- (b) The Permittee shall complete reclamation of the Blackwater Early Works Area (Figure 1), as described in Document 1.1, within 5 years of commencing physical Early Works activities.

3. Land Use

- (a) The Permittee shall ensure that the land surface is reclaimed with the intent of re-establishing average pre-mining capability to the following end land use objectives: wildlife habitat, and opportunities for traditional use of the land by the Lhoosk'uz Dené Nation, Ulkatcho First Nation, Skin Tyee Nation, and Tsilhqot'in Nation.
- (b) The Permittee shall ensure that borrow pits and quarries belonging to the mine development and operations, are reclaimed by the Permittee to the approved end land use once no longer required.

4. Erosion Control

The Permittee shall achieve reduction of erosion through landform configuration, development of maintenance-free vegetation covers, and the development of stable, self-sustaining drainage control features and watercourses.

5. Re-vegetation

The Permittee shall ensure the land is revegetated to a self-sustaining state using appropriate and or native plant species including culturally important native species.

6. Growth Medium

- (a) The Permittee shall monitor soil replacement operations to ensure the minimum depths are achieved and a confirmation sampling plan shall be developed to ensure quality of soil used for reclamation purposes will achieve end land use objectives. The Permittee shall report all results in the Annual Reclamation Report.
- (b) With the exception of areas where closure plans require compaction prior to placement of growth medium in order to reduce infiltration and contact water, the Permittee shall ensure that areas to be reclaimed are decompacted to the minimum depth required to adequately address the severity of compaction prior to placement of soil and or vegetation, in a manner intended to achieve end land use objectives and erosion control.

7. Surface Water Management Ponds and Channels

The Permittee shall reclaim all surface water management ponds and water diversions to satisfy stability and erosion control requirements and the approved end land use once no longer required.

8. Mine Roads

The Permittee shall ensure all mine roads are reclaimed, in accordance with recommendations of a qualified professional, to satisfy the approved end land use objectives, including all reasonable effort to fully re-configure to conform to adjacent landscape where long-term stability is not compromised, unless permanent access is required.

Figure 1 – Permitted Mine Area

DRAFT

**PROVINCE OF BRITISH COLUMBIA
MINISTRY OF ENERGY, MINES AND LOW CARBON INNOVATION**

PERMIT

APPROVING EARLY WORKS PROGRAM

(Issued pursuant to Section 10 of the *Mines Act* R.S.B.C. 1996, c. 293)

Permit: **M-246**

Mine No: 1641022

Issued to: **BW Gold Ltd.
Suite 3083 - 595 Burrard Street
Vancouver, BC Canada
V7X 1L**

for work located at the:

Blackwater Mine

Issue Date

June 22, 2021

Approving Early Works Program

Issued at Victoria, British Columbia this 22nd day of June in the year 2021.



J. Lowell Constable, P.Eng
Deputy Chief Permitting Officer
Major Mines Office

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PREAMBLE

The Mines Act Permit application, and applications for changes to approved works and conditions to Permit M-240, have been submitted to the Chief Permitting Officer, in accordance with Section 10(1), 10(6), or 10(7) of the *Mines Act*, and Sections 10.1.2 and 10.1.18 of the Health, Safety and Reclamation Code for Mines in British Columbia (Code).

Where more than one version of information exists in the application, the most recent version must be considered the approved version unless otherwise stated or determined by the Chief Permitting Officer.

1. Approving Early Works Program (Issued June 22, 2021)

- 1.1 Application entitled '*Blackwater Gold Project - Early Works Joint Mines Act / Environmental Management Act Permits Application*', prepared by ERM, dated February 2021.
- 1.2 Report entitled '*Rapid Infiltration Concept for the Plant Site Sediment Collection Pond Discharge*', prepared by Knight Pièsold Ltd., dated April 20, 2021.
- 1.3 Report entitled '*Appendix A - Supplemental Material to Support Early Works Permits Application*', prepared by ERM Consultants Canada Ltd., dated May 10, 2021.
- 1.4 Memorandum entitled '*Addendum to the Blackwater Project Early Works Construction Environmental Management Plan – Overburden ML/ARD Management Plan*', prepared by Lorax Environmental Services Ltd., dated April 26, 2021.
- 1.5 Report entitled '*Appendix E – Early Works Erosion and Sediment Control Plan*', prepared by Knight Pièsold Ltd., dated February 4, 2021.

Received: February 5, 2021

Publication: March 4, 2021 gazette

Referred: February 8, 2021 to MRC/MDRC

Environmental Certificate #M19-01 was issued for this project by the Environmental Assessment Office under the authority of the *Environmental Assessment Act* S.B.C. 2002, C.43 (Act), on June 21st, 2019.

This permit contains the requirements of the Ministry of Energy, Mines and Low Carbon Innovation. It also is compatible, to the extent possible, with the requirements of other provincial ministries. However, nothing in this permit limits the authority of other provincial ministries to set other conditions, or to act independently, under their respective permits and legislation.

The Blackwater Mine is located within the traditional territories of Lhoosk'uz Dené Nation (LDN) and Ulkatcho First Nation (UFN). Other components of the Project, including the existing Kluskus and Kluskus-Ootsa Forest Service Roads (FSRs) and transmission line, cross the traditional territories of Nadleh Whut'en First Nation, Saik'uz First Nation, and Stellat'en First Nation.

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CONDITIONS

The Chief Permitting Officer hereby approves the Mine Plan and Reclamation Program as submitted in the Application(s), subject to compliance with the following conditions:

A. General

1. Compliance with *Mines Act* and Code

The Permittee must ensure that all work is in compliance with all sections and parts of the *Mines Act* and the Health, Safety and Reclamation Code for Mines in B.C. (Code), and the Permittee must obey all orders issued by the Chief Inspector of Mines (Chief Inspector) or their delegate.

2. Departure from Approval

The Permittee must notify the Chief Permitting Officer in writing of any intention to depart from the Mine Plan and Reclamation Program approved under this *Mines Act* permit (M-246) to any substantial degree, and must not proceed to implement the proposed changes without the written authorization of the Chief Permitting Officer.

3. Permit Approval

(a) The Permittee is authorized under this permit (M-246) for development outlined in Document 1.1, including surface disturbance and works, within the area encompassing approximately 1,018.9 Ha, as outlined in Figure 1 (Permitted Mine Area), which includes management buffers around the approved disturbance. The Permittee is not approved to develop borrow sources located outside of the Permitted Mine Area.

(b) The Permittee is not authorized under this permit (M-246) for the extraction of ore within the Permitted Mine Area (Figure 1).

4. Permit

This Permit is not transferable or assignable.

5. Maintenance of Mine

The Permittee must maintain mine facilities and infrastructure in a manner to meet design objectives, environmental protection requirements and reclamation requirements.

6. Sign-off by a Qualified Professional

Unless otherwise approved in writing by the Chief Permitting Officer or Chief Inspector, the Permittee must ensure that all reports required to be submitted under this permit are signed by a qualified professional with applicable experience and registered in the Province of British Columbia.

7. First Nations Information Sharing

Unless otherwise requested by the Chief Permitting Officer or Chief Inspector, the Permittee must provide to the Lhoosk'uz Dené Nation and Ulkatcho First Nation all material reports and plans required to be submitted under this permit, including annual monitoring reports, results of research programs, and the Reclamation and Closure Plan.

8. Compliance Status Report

The Permittee must track compliance status of all permit conditions and inspection orders in a form acceptable to the Chief Inspector. The Permittee must maintain an up-to-date tracking table on site. The Permittee must ensure that the tracking table is available at the mine site at all times and to a Mines Inspector upon request. The Permittee must prepare and submit an annual Compliance Status report to the Chief Inspector by March 31st and must include a summary of outstanding non-compliance issues and an action plan, to the satisfaction of the Chief Inspector, for achieving compliance.

B. Geotechnical

1. General

- (a) The Permittee must ensure that all geotechnical designs, specifications, work plans, monitoring requirements and reports required to be prepared under section (B) are:
 - (i) Signed by a Professional Engineer and are submitted to the satisfaction of the Chief Inspector; and
 - (ii) Maintained on site and made available to any Inspector of Mines, upon request.
- (b) The Permittee must ensure construction is completed under the supervision of a Professional Engineer and that sufficient field reviews have been conducted to ensure that facilities are built in general conformance of the design, accepted engineering practices, and the Code.

- (c) The Permittee must ensure recommendations by a Professional Engineer, relating to health and safety, geotechnical stability, or environmental protection, are followed, unless a suitable alternative course of action is approved in writing by a Professional Engineer.
- (d) The Permittee must submit an Advice of Geotechnical Incident form to the Chief Inspector for any geotechnical incident that is classified as a dangerous occurrence or any other incident as described in the current EMLI Advice of Geotechnical Incident form.

2. Surface Water Ponds, Ditches, and Diversions

- (a) The Permittee must not commence construction of surface water ponds, ditches, or diversion channels until Issued for Construction (IFC) drawings, signed by a Professional Engineer, are submitted to the Chief Inspector. This condition does not apply to temporary diversion channels required to facilitate construction.
- (b) The Permittee must ensure that surface water ponds, ditches and diversion channels are designed to convey the design flood without overtopping, without side slope failure, and with adequate armour or lining to prevent significant erosion.
- (c) The Permittee must ensure all surface water ponds and ditches are designed by a Professional Engineer. The Permittee must choose the design flood with consideration of the consequence of failure and duty life of the structure. This condition does not apply to temporary diversion channels required to facilitate construction.
- (d) The Permittee must submit an “As-Built” report to the Chief Inspector for all surface water ponds, ditches and diversion channels within 30 days of commissioning. The Permittee must ensure that the report certifies that each facility has been constructed in accordance with the design, this permit, and applicable guidelines. This condition does not apply to temporary diversion channels required to facilitate construction.
- (e) The Permittee must include all surface water ponds, ditches and diversion channels in an Annual Inspection Review Report of water management facilities on the mine site. The Permittee must submit the report to the Chief Inspector by March 31st of the year following the review. This condition does not apply to temporary diversion channels required to facilitate construction.
- (f) The Permittee must submit a Site Characterization Report for the sediment control pond dam area to the Chief Permitting Officer a minimum of 90 days prior to construction.

3. Soil, Overburden and Rock Stockpiles

The Permittee must ensure that all soil, overburden, and rock stockpiles are constructed in accordance with designs prepared by a Professional Engineer, unless exempt in writing from the Chief Permitting Officer, and are constructed and inspected to ensure stability and erosion control is maintained.

4. Borrow Pits and Quarry Excavations

The Permittee must ensure that borrow and quarry excavations are constructed in accordance with designs prepared by a Professional Engineer and are constructed and inspected to ensure stability and erosion control is maintained.

5. Mine Site Roads

- (a) The Permittee must ensure that mine roads are constructed in accordance with designs prepared by a Professional Engineer and are constructed and inspected to ensure stability and erosion control is maintained.
- (b) The Permittee must ensure that cuts and fills in excess of 6 m height (if any) are designed by a Professional Engineer.
- (c) The Permittee must ensure that “As-Built” drawings are prepared within three months of completion. The Permittee must ensure that the “As-Built” drawings and records are filed on-site.

C. Protection of Land and Watercourses

1. Environmental Management System

- (a) The Permittee must implement an Environmental Management System (EMS) consisting of Environmental Management Plans (EMPs) and Standard Operating Procedures (SOPs). The Permittee must ensure the EMS references relevant policies and establishes proactive procedures to provide direction for effective operational management and monitoring on-site.
- (b) The Permittee must ensure the EMS is reviewed annually, revised as soon and as often as required, and made available at the mine site at all times and to an Inspector of Mines upon request. The Permittee must ensure the findings of the annual review of the EMS are reported in the Annual Reclamation Report.

- (c) The Permittee must ensure that mine site employees and contractors are knowledgeable and accountable to act consistently with the requirements of the EMPs and SOPs that form the EMS.

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- (a) The Permittee must ensure that a qualified Environmental Site Manager is assigned.
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- (i) The Permittee must ensure that all materials with the potential to generate ML/ARD are placed in a manner that minimizes the production and release of metals and contaminants to levels that assure protection of environmental quality.
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- (i) The Permittee must define overburden containing solid-phase zinc concentrations greater than 1000 ppm as having the potential for metal leaching.
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- (i) The Permittee must implement the Overburden ML/ARD Management Plan (Document 1.4), including standard operating procedures (SOPs) as required.

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The Permittee must not disturb or excavate bedrock or otherwise produce waste rock.

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The Permittee must ensure results of the ML/ARD analytical testwork, outlined in the Overburden ML/ARD Management Plan (Document 1.4), are reported and assessed in the Annual Reclamation Report. The Permittee must discuss any significant changes or trends and implications for materials handling must be identified.

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<u>Date</u>	<u>\$</u>	<u>Cumulative</u>
Security held as of June 22, 2021		\$0.00
By August 31, 2021	\$980,000.00	\$980,000.00

- (b) Notwithstanding the security posted as a condition of this Permit, the Permittee remains responsible for covering all closure and reclamation costs associated with reclamation and environmental protection.

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- (b) The Permittee must complete reclamation of the Blackwater Early Works Area (Figure 1), as described in Document 1.1, within 3 years of commencing physical Early Works activities.

3. Land Use

- (a) The Permittee must ensure that the land surface is reclaimed with the intent of re-establishing average pre-mining capability to the following end land use objectives: wildlife habitat, and opportunities for traditional use of the land by the Lhoosk'uz Dené Nation and Ulkatcho First Nation.
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The Permittee must ensure the land is revegetated to a self-sustaining state using appropriate and or native plant species including culturally important native species.

6. Growth Medium

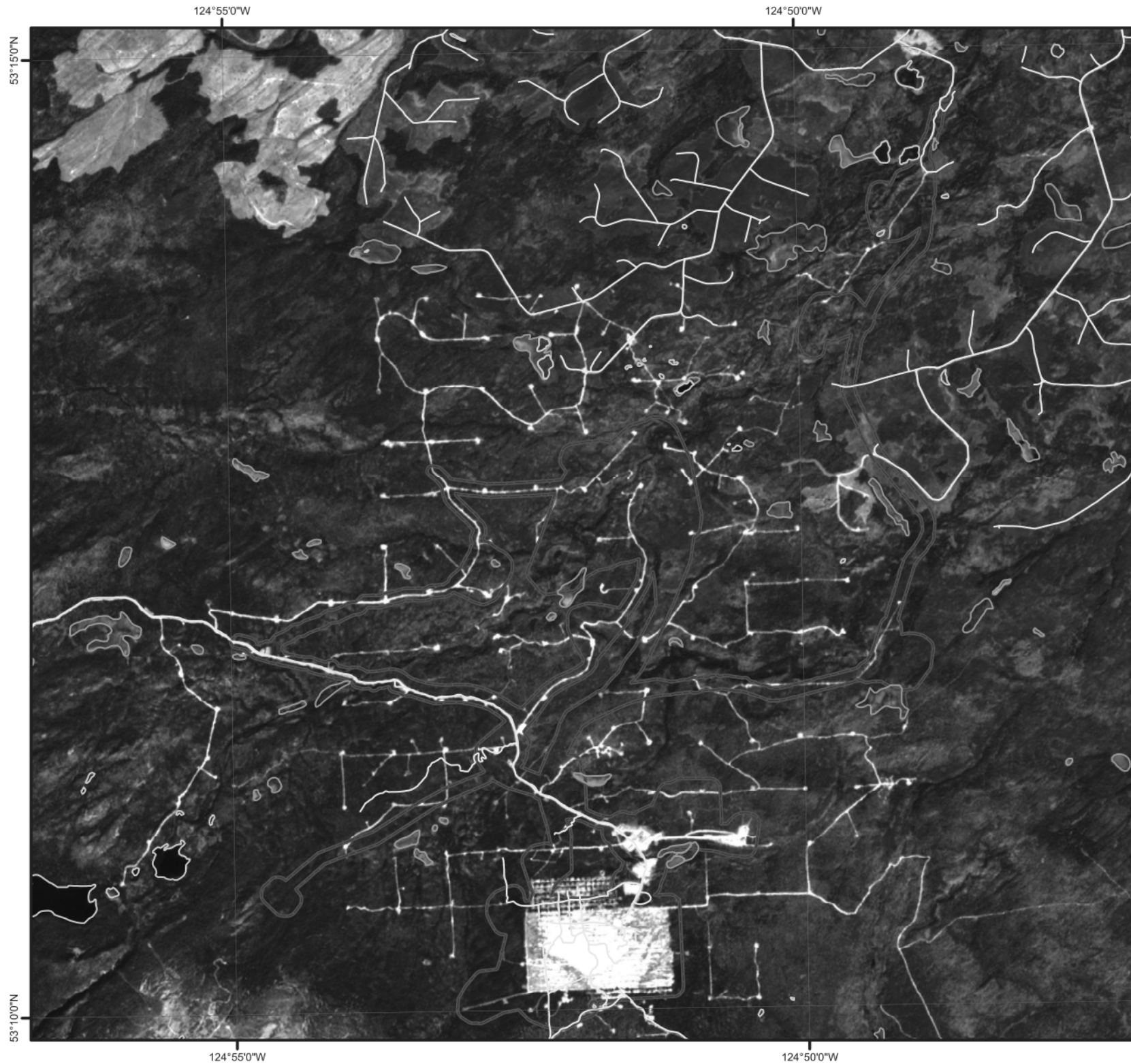
- (a) The Permittee must monitor soil replacement operations to ensure the minimum depths are achieved and a confirmation sampling plan must be developed to ensure quality of soil used for reclamation purposes will achieve end land use objectives. The Permittee must report all results in the Annual Reclamation Report.
- (b) With the exception of areas where closure plans require compaction prior to placement of growth medium in order to reduce infiltration and contact water, the Permittee must ensure that areas to be reclaimed are decompacted to the minimum depth required to adequately address the severity of compaction prior to placement of soil and or vegetation, in a manner intended to achieve end land use objectives and erosion control.

7. Surface Water Management Ponds and Channels



The Permittee must reclaim all surface water management ponds and water diversions to satisfy stability and erosion control requirements and the approved end land use once no longer required.

8. Mine Roads

The Permittee must ensure all mine roads are reclaimed, in accordance with recommendations of a qualified professional, to satisfy the approved end land use objectives, including all reasonable effort to fully re-configure to conform to adjacent landscape where long-term stability is not compromised, unless permanent access is required.



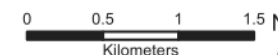
Blackwater Mine Project Early Works

-  Lake
-  Wetland

Permitted Mine Area

-  Permitted Mine Area 1,018.94 ha

Imagery Date: 2020/07/30



Base Data:
 BC Geographic Warehouse & ESRI Imagery
 NAD 1983 BC Environment Albers
 Date: 2021-03-17 9:34:19 AM
 Author: B. B. B.