



Blackwater Mine



Tenure Holder Communications and Mitigation Plan

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Work Instructions

Tenure Holder Communications and Mitigation Plan

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Context Statement

The Blackwater Gold Project (Project) received Environmental Assessment Certificate (EAC) #M19-01 on June 21, 2019, under the 2002 *Environmental Assessment Act* and a Decision Statement (DS) on April 15, 2019, under the *Canadian Environmental Assessment Act, 2012*, approving the Project with conditions. Blackwater is an open pit gold and silver mine with associated ore processing facilities located 112 kilometers southwest of Vanderhoof in central British Columbia (BC).

The Tenure Holder Communication and Mitigation Plan (THCMP) addresses Condition 38 of the Project's EAC #M19-01, which requires this plan to be developed in consultation with the Ministry of Forests, Lands, Natural Resources Operation and Rural Development and the holder of guide territory certificate #601039 (GTC 691), Batnuni Lake and Guide Outfitters Ltd. (Tenure Holder or Batnuni). As a point of clarification, #601039 is the Guide Territory Certificate number, not the guide outfitter license number as referenced in the Condition. Research to-date indicates the Guide Territory Certificate is held by Lyle Barsby, who is a shareholder in Batnuni and a licensed guide outfitter. Lyle Barsby has authorized Jim Linnell, the co-owner of the Corporation and licensed Guide Outfitter, to engage and negotiate on his behalf.

Engagement with the Guide Outfitter and this THCMP has been informed by EAC 4, BC's A Practical Guide to Effective Coordination of Resource Tenures (Province of British Columbia 2008) and mitigation guidance provided by the Guide Outfitting Association of BC. A concordance table identifying where the requirements in the EAC 38 are located in the plan is provided in Appendix A.

Further, for clarification, Condition 38 is titled "Tenure Holder Communication and Mitigation Plan" and refers throughout to the "Licence Holder". This plan refers to "Tenure Holder" throughout which is intended to have the same meaning as "Licence Holder".

Definitions

Artemis	Artemis Gold Inc., owner/operator of BW Gold Project
BC	British Columbia
BC EAO	British Columbia Environmental Assessment Office
BW Gold	BW Gold LTD.
CEO	Chief Executive Officer
COO	Chief Operating Officer
CM	Construction Manager
COO	Chief Operating Officer
DS	Decision Statement
EA	Environmental Assessment
EAC	Environmental Assessment Certificate
EAO	Environmental Assessment Office
EIS	Environmental Impact Statement
EM	Environmental Manager
EMS	Environmental Management System
EPCM	Engineering, Procurement and Construction Management
FLNRORD	Ministry of Forests, Lands, Natural Resource Operations and Rural Development
FSR	Forest Service Road
GM	General Manager
GTC	Guide Territory Certificate
ha	Hectares
LRMP	Land and Resource Management Plan
NVMP	Noise and Vibration Effects Monitoring and Mitigation Plan
SPNM	Semi-Primitive Non-Motorised
THCMP	Tenure Holder Communications and Mitigation Plan
VP	Vice President

1.0 Project Overview

The Blackwater Gold Project (the Project) is a gold and silver open pit mine located in central British Columbia (BC), approximately 112 kilometres (km) southwest of Vanderhoof, 160 km southwest of Prince George, and 446 km northeast of Vancouver.

The Project is presently accessed via the Kluskus Forest Service Road (FSR), the Kluskus-Ootsa FSR and an exploration access road, which connects to the Kluskus-Ootsa FSR at km 142. The Kluskus FSR joins Highway 16 approximately 10 km west of Vanderhoof. A new, approximately 13.8 km road (Mine Access Road) is planned to be built in approximately 2024 to replace the existing exploration access road, which will be decommissioned. The new planned access will be constructed through an existing access trail located at km 124.5 off of the Kluskus FSR. The access trail at km 124.5 is utilized by the Tenure Holder as their trailhead into the Davidson region of the Guide Certificate Territory (GTC). Driving time from Vanderhoof to the mine site is about 2.5 hours.

Major mine components include a tailings storage facility (TSF), ore processing facilities, waste rock, overburden and soil stockpiles, borrow areas and quarries, water management infrastructure, water treatment plants, accommodation camps and ancillary facilities. The gold and silver will be recovered into a gold-silver doré product and shipped by air and/or transported by road. Electrical power will be supplied by a new approximately 135 km, 230 kilovolt overland transmission line that will connect to the BC Hydro grid at the Glenannan substation located near the Endako mine, 65 km west of Vanderhoof.

The Blackwater mine site is located within the traditional territories of Lhoosk'uz Dené Nation (LDN), Ulkatcho First Nation (UFN), Skin Tyee Nation and Tsilhqot'in Nation. The Kluskus and Kluskus-Ootsa FSRs and Project transmission line cross parts of the traditional territories of Nadleh Whut'en First Nation (NWFN), Saik'uz First Nation (SFN), and Stellat'en First Nation (StFN; collectively, the Carrier Sekani First Nations) as well as the traditional territories of the Nazko First Nation (NFN), Nee Tahi Buhn Band, Cheslatta Carrier Nation and Yekooche First Nation (BC EAO 2019a, 2019b).

Project construction is anticipated to take two years. Mine development will be phased with an initial milling capacity of 15,000 tonnes per day (t/d) for the first five years of operation. After the first five years, the milling capacity will increase to 33,000 t/d for the next five-years, and to 55,000 t/d in Year 11 until the end of the 23-year mine life. The Closure phase is 24 years to approximately 45 years, ending when the Open Pit has filled, and the Post-closure phase is 46+ years. The transmission line construction is expected to occur simultaneously with the mine site development. Further detail is provided in this document.

Off-site works, mine access road, waterline and airstrip are also planned as phased work in future years.

New Gold Inc. (New Gold) received Environmental Assessment Certificate (EAC) #M19-01 on June 21, 2019 under the 2002 *Environmental Assessment Act* (EAO 2019c) and a Decision Statement (DS) on April 15, 2019 under the *Canadian Environmental Assessment Act, 2012* (CEA Agency 2019). In August 2020, Artemis Gold Inc. (Artemis) acquired the mineral tenures, assets and rights in the Blackwater Project that were previously held by New Gold Inc. On August 7, 2020, the Certificate was transferred to BW Gold Ltd. (BW Gold), a wholly-owned subsidiary of Artemis, under the 2018 *Environmental Assessment Act*. The Impact Assessment Agency of Canada notified BW Gold on September 25, 2020, to verify that written notice had been provided within 30 days of the change of proponent as required in Condition 2.16 of the DS, and that a process had been initiated to amend the DS.

2.0 Purpose and Objectives

The purpose of the Tenure Holder Communication and Mitigation Plan (THCMP) is to understand and address potential adverse effects of the Blackwater Project on the business conducted under GTC 601 and establish processes to communicate, share information and implement the plan. The communication process implementing the Plan is described in Section 11. The THCMP is developed in consultation with FLNRORD and the Tenure Holder.

The THCMP objectives are to identify measures to mitigate potential effects on GTC 601 and monitor and report on the effectiveness of the mitigations.

As context for the reader of this THCMP, Condition 38 specifically indicates that the THCMP must include at least the following:

- a. Mitigation measures to address potential for adverse effects to the License Holder's operations, including but not limited to:
 - Using noise abatement measures and consideration of scheduling Project activities to limit disruptions to the guiding operations; and
 - Providing the construction schedule to the License Holder 30 days prior to the planned commencement of Construction.
- b. An analysis of how the consultation with the License Holder and mitigation and accommodation measures in the plan are consistent with BC's A Practical Guide to Effective Coordination of Resource Tenures (2008, or as updated or replaced from time to time).
- c. A detailed description of the consultation undertaken with the License Holder regarding other mitigation measures in paragraph (a) and analysis in paragraph (b), including a report on concerns raised by the License Holder and the Holder's response to those concerns.
- d. The means by which the Holder will monitor and report on the effectiveness of the mitigations referred to in paragraph (a).

2.1 EAC Conclusions

The EAO reflected in Section 14.3.2 Effects to Non-Traditional Land and Resource Use, that Batnuni Lake Guide and Outfitters expressed strong opposition to Blackwater based on its view on how New Gold's exploration activities have and could continue to affect their certificate area, which is adjacent to the Blackwater mine site and continues other off-site works. However, New Gold and Batnuni were not able to resolve their difference of views during the course of the EA.

The EAO is of the view that there are potential effects to Batnuni, however, because of the strong difference of views as to the nature and extent of this effect, the EAO is not able to conclude on specific mitigation that would be appropriate. Therefore, the EAO proposes Condition 38: Tenure Holder Communication and Mitigation Plan and Report, which would require New Gold to retain a Qualified Person to develop a Tenure Holder Communication and Mitigation Plan. This Plan would include details related to how New Gold would consult with Batnuni Guide Outfitters regarding mitigation measures, share a construction schedule, identify mitigation measures, and produce a report on the results of consultation and mitigation measures that will be implemented.

3.0 Guide Outfitting Business

This section describes the Tenure Holder's guide outfitting business and the role and obligations associated with Guide Territory Certificate (GTC) #601039 (GTC 601). Understanding the real and potential impacts to the operation of the Tenure Holder's business is foundational to determining mitigations and their implementation. The Certificate Holder has sought opportunities through meetings, emails, letters and telephone calls to engage with the Tenure Holder to understand their use of GTC 601, their business model, management of the business and potential impacts on the business arising from impacts in GTC 601. Detailed information exchanges were initiated in Spring 2016, have been ongoing and are captured in Appendix C, Engagement Record.

3.1 Guide Territory Certificate #601039

A GTC provides for the exclusive opportunity to guide hunting experiences within the designated tenure area. The GTC Holder is granted a five-year allocation for all category A species in the region. Licensed Guide Outfitters are required to operate in the GTC. Wildlife quotas are provided to the licensed Guide Outfitter (based on the 5 year allocation) and are administered annually and include a 30% administrative guideline (BC FLNRORD 2021a).

Guide Outfitters have a license with conditions, which if not followed may result in an administrative hearing and the license being cancelled. As a condition of the Guide Outfitting license, Guides must report, through a guide declaration, every guided hunt regardless of harvest success (BC FLNRORD 2021a).

GTC 601 is one of 6 GTCs which intersect Wildlife Management Unit (WMU) 6-01 and the only GTC with exclusive rights to guide in what the Vanderhoof Land and Resource Management Plan (LRMP) (Province of BC 2008b) and the associated Access Management Plan identifies as a "semi-primitive non motorised (SPNM) wilderness zone". It is commonly referred to as "the Davidson Zone". It is located in the most southeast corner of the Skeena Wildlife Region 6 in Management Unit 6-01

GTC 601 is held by Lyle Barsby, who is a shareholder with Darren James Linnell (Linnell) in the Batnuni Lake Guide and Outfitters Ltd. (Batnuni) and a licensed Guide Outfitter, hereafter referred to as the Tenure Holder. Linnell is a licensed Guide Outfitter who holds the right to guide within GTC 601. Batnuni is in the business of guiding non-resident and resident hunters (Batnuni 2016a, Batnuni 2022).

Batnuni utilizes GTC 601 and GTC #500948 (Linnell). Linnell also has the right to guide in GTC #500983.¹ The Tenure Holder reported purchasing GTC 601 in 2005 to access an increased allocation and quota for moose and a different and unique option for hunters by providing a wilderness experience away from the pressures of resident hunters (Batnuni 2016). Lyle Barsby became registered as GTC 601 rights holder in January, 2007.²

Within GTC #500948, Batnuni reports purchasing a 160 acre parcel (PID 015-000-141) nearby Pelican Lake and 4.633 acres of lakefront property at Lucky Dollar Lake (PID 018-027-547) and building a main lodge, hunter cabins and other structures in 2005. Deeded property at Batnuni Lake (within GTC #500948 and about 75km eastward from northern Tatelkuz Lake, was fenced and utilized to keep horses. (Batnuni 2021a).

As of 2022, there is currently no camp infrastructure or active *Land Act* tenures located within the boundary of the Certified Project Description (Appendix E) or *Land Act* tenures within GTC 601.

¹ Environmental Appeal Board, Decision WIL-2009-003(a) et al, Clause 7.

² Integrated Land and Resource Registry, ILRR Identifier 1206416, January 10, 2007.

The Tenure Holder reports that in the past, within several years of the purchase of GTC 601 they developed the following infrastructure:

- A license of occupation for a hunt camp on the northeast end of Tatelkuz Lake was obtained in 1998³. Crown land registry records indicate the 1.24 hectare (ha) hunt camp was in place from February 1998 and expired February 4, 2008, approximately 14 months after registration of GTC 601).
- Corals and drift fences were constructed and there were plans to construct a cabin at that location.
- A tent platform camp had been established approximately 14 kms from the road closure trailhead at km 124.5. (Batnuni 2021a). A review of Crown land registry records did not contain a record to confirm this statement.

Crown land registry records indicate an additional 0.9 ha License of Occupation for a camp at Comstock Lake (within GTC #500948) was in place effective October 2013 and was renewed effective September 2015 for thirty years.

3.2 Tenure Holder Business Operations

A factor in the purchase of GTC 601 was the understanding that the Vanderhoof LRMP (Province of BC 2008b) designated a SPNM recreational use over the Davidson Zone which would allow for non-motorized (horseback) hunting experiences (Batnuni 2016).

Business Offerings

The business operates on a spot and stalk method, focusing on spring (bear) and fall (moose) harvest seasons and year-round incidental species harvest which includes mule deer, whitetail deer and wolf (Batnuni 2021a). The spring bear hunting season is from April 1 through June 30. The fall moose, deer and bear season is generally from September 1 through November 15. The winter season can run from early December through to February (Batnuni 2021a).

Batnuni's website describes the services offered:⁴:

Batnuni Lake Guides & Outfitters operates its Moose and Bear Hunts within a huge area of roughly 2500 square miles of prime Canadian Moose and Black Bear habitat. We have over 200 lakes and 3 major rivers, the Blackwater, Euehniko and Chilako. The area is made up of; timber, logged areas, lakes, creeks and beaver swamps. This provides you with one of BC's premier moose, bear, timber wolf, cougar and lynx habitat.

The elevation runs from sea level upwards of 6000 feet. Located on the game rich Nechako Plateau in south central British Columbia, Canada. Just 2 hours south of Prince George and 2 hours west of Quesnel delivers a robust challenging terrain that is easy to get too. A successful hunt is high, as the area is on a tightly regulated draw system. This area has very limited hunting pressure.

Wilderness horseback hunting experiences, emphasizing the remoteness and semi-primitive non motorized nature of the Davidson Zone were previously offered (Batnuni 2016). Hunts range up to 10 days for a moose hunt and 7 days for a bear hunt and may end earlier based on success. Winter hunts vary in length depending on the species targeted (Batnuni 2021a).

The Tenure Holder reported using GTC 601 annually after purchase up until receiving a letter from New Gold in May, 2016 regarding exploration activities, after which they felt use was unsafe given the increased vehicle traffic (Batnuni 2022a). Guiding is understood to have started in 2007 when GTC 601

³ GATOR File 0218516 Effective February 4, 1998 – Expired February 4, 2008 (GTC #601039).

⁴ Batnuni Website: <https://www.batnunilake.com/bc-hunting-packages/>.

became registered in Barsby's name (Batnuni 2021c). An harvest record provided by the Tenure Holder begins in 2009. (Batnuni 2021c). In response to a request for harvest statistics for WMU 6-1 from 1999 to date, FLNRORD indicated that statistics may be accessed through a Freedom of Information Request.(FLNRORD 2021a)

Business Operations

The licensed guides reside outside the region and move to the primary camp during the key hunting seasons. There are no full-time staff (BW Gold 2021a) and services were described by the Tenure Holder in a November 2021 meeting with BW Gold, as an informal “mom and pop” organization.

Harvest statistics supplied by the Tenure Holder indicate harvests occurred in GTC 601 from 2009 to 2015, with an average non-resident harvest of 1.85 animals per year (Batnuni 2021c). Public information has indicated a part-time and intermittent presence in GTC 601 from 2007 to 2015^{5,6,7}.

The Certificate Holder has requested information from the Tenure Holder related to their historical allocation, quota, services offered, and actual hunts delivered on multiple occasions in 2016, 2018 and 2021. The information is necessary understand how the business operated in order to further understand how it may have been impacted. The Tenure Holder has stated they did not retain the information requested and offered FLNRORD harvest records as the proxy.

Planning

Planning occurs from one to three years in advance given the time required to plan guest logistics (e.g., air transport, firearm transport documents). Certain hunts can occur last minute, especially winter hunts and some spring bear hunts (Batnuni 2021a).

Guide ratios are constrained by the *Wildlife Act* regulation⁸ which makes it an offense for a license holder to guide more than two hunters at a time.

Accommodation is described as remote. Preparation for a hunt involves bringing in food, cleaning and other supplies, cutting trails and preparing vehicles, snowmobiles, and horses (as applicable). The hunter supplies personal items (e.g., clothing, firearm, sleeping bag). Batnuni supplies all food, drink, transport, guides and labour (Batnuni 2021a).

The size of hunting groups varies based on the harvest quota for that year in the GTC and capacity of the Tenure Holder to accommodate the size of the group. Despite planning years in advance as noted above, operating expenses are “just in time” and include guides and cooks (BW Gold 2021).

Annually guides would re-establish existing trails or cut new trails in advance of trips.

Operating

The Tenure Holder has the right to utilize a vast guiding territory. The business model utilizes a fraction of GTC 601 within the SPNM Davidson Zone.

Guests stay at the 4.633 ac Lucky Dollar Lake site, a lakeside location containing a main lodge and self-contained cabins. The facilities are outside of GTC #601039 (Batnuni 2022b)

⁵ GTC Certificate Registration, January 2007.

⁶ Forest Practices Board Complaint Investigation #100971 Davidson Creek Access Management, May 2012.

⁷ Batnuni Submission to BC EAO, Spring 2016 citing harvest stopped since 2013.

⁸ *Wildlife Act*, Commercial Activities Regulation BC Reg 220/2021, Section 1.05.

Previously guests and horses were transported on the Kluskus FSR to a main trailhead which takes off at a gate to the Davidson Mainline at km 124.5. A gate marks the location of the beginning of the SPNM within the Davidson Zone. In the past a corral was built here to support the staging.

Guests would pack in from 1 to 14 km through a series of trails and former logging roads. A camp utilizing tent trailers was at one time established about 1 km off of the FSR (Barsby, February 2, 2022).

Impacts to the Business

The Kluskus FSR is the main access into the Davidson Zone utilized by recreational and commercial vehicles. Authorized commercial vehicles may proceed past the gate at km 124.5, and all others are required to proceed in a non-motorized manner. The forest industry has been active for many years preceding Batnuni's acquisition of GTC 601 arising from the provincial strategy to address the Mountain Pine Beetle infestation. A forestry company is responsible for maintaining the Kluskus FSR and controlling access via the gate at km 124.5.

Previous to the installation of the gate, the Tenure Holder filed a complaint in 2010 seeking a resolution to the impacts Batnuni experienced in 2008 and 2009 when the road was not blocked by the road operator, seasonally as had been the past practice.

Forest Practices Board decision related to the Davidson Creek Access Management⁹ summarizes that the licensee responsible for the road refused to close the road before hunting season, as a result the Tenure Holder did not use the area that year (2008). In 2009, the licensee did not close the road to motorized traffic until after the hunting season and the Tenure Holder met a logging contractor hunting from a vehicle. The Tenure Holder expressed that the guiding territory is now effectively lost as a revenue generator.

A listing for the Batnuni business in 2010 (MLS N4505439L) was identified online and further information was sought from the Tenure Holder by BW Gold on December 14, 2021. No further information on the context of the sale or purpose has been provided by the Tenure Holder. The Certificate Holder notes this date aligns with both the 2008 and 2009 experiences and the reduction of the Tenure Holder's 2009 moose quota (EAB Appeal Decision 2009-WIL-003a et al) for their other GTC. The attempted sale occurred prior to mineral exploration activity and demonstrated that the Batnuni business had multiple pressures.

A record of engagement between the Tenure Holder and Certificate holder demonstrates active outreach and engagement between 2013 to 2015. New Gold provided notifications of field work and engaged with the Tenure Holder regularly on proposed field works and locations and attempts to schedule works around spring and fall hunting seasons.

In Spring 2016 the tenure holder submitted to the EAO that "Batnuni had curtailed offering wilderness horseback trips in the Davidson from 2013 to present due to the high number of drill rigs, traffic and noise, did not allow them to hunt in the fashion as previously" (Batnuni 2016a). Following this submission, the Certificate Holder has been seeking additional information from the Tenure Holder to understand the nature and extent of the impacts.

The specific trails utilized by Batnuni are unknown, however, it is understood that guests are guided in the general vicinity of Davidson Zone, which contains the mine site and offsite works such as the airstrip and Tatlukuz Lake waterline. The Tenure Holder's business relies on the sale of wilderness experiences, which must meet the client's expectation of wilderness. Past experience and future fears of the breadth of the mine site and off-site development lead the Tenure Holder to believe that their tenure and the mine tenures are incompatible and the primary options for mitigation are a) avoidance whereby the Certificate Holder ceases work for 5 months per year or b) compensation to the Tenure Holder for financial impacts arising from the incompatibility.

⁹ Forest Practices Board Complaint Investigation #100971, May 2012.

Impact Summary

An April 29, 2016 letter from New Gold to the BC EAO (New Gold 2016) summarizes all project components and potential impacts on the Tenure Holder. The letter contained detailed maps of the proposed mine site, off-site infrastructure and roads in relation to GTC 601.

After May 17, 2016, Tenure Holder reported to the Region 6, FLNRORD Wildlife Section Head, that due to disruptions such as noise, dust and vehicle traffic on the FSR (beyond the SPNM Boundary), their Guiding Territory could no longer be operated. FLNRORD confirmed that a Section 59.1 *Wildlife Act* decision was issued to allow the Guide Outfitter to not exercise their Guide quota.(FLNRORD Jan 2022 Condition 38 Response).

A contributing factor to Batnuni's decision to no longer operate was the uncertainty which arose around whether works timing could be controlled by the Certificate Holder in September and October. As noted previously, the Tenure Holder had had at least one past experience which had triggered a similar decision to not operate.

Past impact themes and future concerns of impact provided by the Tenure Holder are summarized in Table 3.2-1.

Table 3.2-1: Past Impact Themes and Future Concerns of Impact

Theme	Detail
Noise, Dust, Vehicle Interactions and traffic within the SPNM Zone (on the Kluskus FSR)	<p>The Tenure Holder transported their horses on the Kluskus FSR to the point at which the SPNM designation begins (124.5), marked by a gate and sign limiting access to authorized and non-motorized recreational visitors.</p> <p>The influx of drilling rigs, vehicle traffic and noise caused them to allow the license of occupation at Tatelkuz Lake to lapse (Batnuni 2016, CI 10)</p>
Noise disturbances associated with mine-site activity including blasting and crushing	Clients do not expect to hear industrial noises on a wilderness experience. it will impact their satisfaction and Batnuni's business credibility.
Visual aesthetic disturbances of an industrialized landscape arising from upgraded roads, transmission line, water line	Wilderness experience will be eliminated due to the visual nature of infrastructure which may be encountered on the landscape on horseback.
Visual aesthetic and noise implications of aircraft use on wilderness	Clients do not expect aircraft operating in the region and it will impact their experience.
Affects of noise, increased vehicles and increased resident hunters will pressure wildlife locations and abundance	<p>Location of wildlife will be impacted by noise and limit the Tenure Holder's ability to have a successful harvest in the preferred area.</p> <p>Wildlife abundance may be impacted by increased traffic and predation and anticipated access by resident hunters which the Guide Outfitter anecdotally believes is connected with new road construction.</p>
Access: Maintaining Access for Batnuni	Concern the Tenure Holder may not have access through gates when guiding.

Theme	Detail
Access: Ensuring Gates are Utilized	Ensuring appropriate control of resident hunters in vehicles are not able to access the SPNM zone in vehicles, by keeping gates locked.
Motorized hunting in Non Motorized Zone	Creates a credibility challenge for the business when guests are on horseback in an area where motorized recreational hunting is banned.
No Shooting Zone	Concern of potential impact of a no-shooting zone limiting shooting zones (but not spot and stalk zones).
Planning Uncertainty	Inability to plan effectively for use in the Davidson Zone and commit to international guests if Certificate Holder's field work is subject to change.

Other Land and Tenure Uses in the Region

The Davidson Zone is an active recreation and resource development region, with multiple forestry licensees, mining, utility, agriculture and range tenure holders, guide outfitters and trappers many of which utilize the primary Kluskus FSR. A list of active and expired tenures overlapping GTC 601 was provided to FLNRORD and the Tenure Holder in November, 2021 by the QP to demonstrate the level of other uses on the land.

Forestry activities occur throughout the region with work primarily to seasonal silviculture and road maintenance obligations (FPB 2012).

In 2012, mineral exploration development associated with the Project commenced and engagement was initiated with the Tenure Holder on various *Mines Act* permitted activities.

Mitigations to Date

New Gold and the Tenure Holder engaged on Crown permit related activities since 2012 and through the pre-Application phase of the BC Assessment process 2016.

From 2013 through 2018, the Certificate Holder enquired seasonally with the Tenure Holder as to planned activities in the Tenure area, and informed the Tenure Holder of field work planned each year in writing. The Certificate Holder sought to avoid or reduce exploration activity in September and October, however, in a few years, work was subject to environmental and other uncontrollable constraints which created an overlap of timing in the region in 2014 and 2015. In 2016 the Tenure Holder advised they were no longer utilizing the tenure (Batnuni 2016). The Certificate Holder continues to distribute notifications to the Tenure Holder for seasonal fieldwork.

The engagement record indicates that the Certificate Holder's attempts to learn specific information about the Tenure Holder's activities, which has not been provided by the Tenure Holder.

The first project introduction occurred between the Tenure Holder and New Gold in November 2012. Calls were exchanged between the Tenure Holder and New Gold in March 2013 to understand what work would be occurring in GTC 601. April 2013, New Gold provided information related to the spring exploration plans related to the transmission line including a map and timeline. Shortly thereafter, the Tenure Holder requested New Gold avoid the Tenure Holder's corrals near Chedakuz Creek, which was agreed. In June, 2013, maps and timing information was provided on the geotechnical drilling program. Two weeks later the potential of impacts and compensation to the Tenure Holder were raised by the

Tenure Holder. In Spring 2014 concerns were expressed by the Tenure Holder and the possibility of modifying New Gold activities to allow for Spring and Fall hunts was requested and New Gold attempted to make accommodations which were unsuccessful. Subsequently communication focused on notification to the Tenure Holder of Spring and Fall Works. The Certificate Holder would provide written information and follow-up contact with letters, emails and phone calls. The Tenure Holder actively engaged through letters, phone calls and emails with the Certificate Holder to understand proposed works, share concerns and discuss opportunities to avoid or mitigate impacts on the Tenure Holder during hunting season. Requests which could not be accommodated were provided to the Tenure Holder. Typical situations which occur in the field resulting in necessary schedule changes were such things as, crew or equipment availability changes and environmental conditions.

The most comprehensive summary of potential impacts on the record may be found in in the Spring 2016 filing by the Tenure Holder to the BC EAO and the previously mentioned April 29, 2016 impact summary letter from New Gold to BC EAO (New Gold 2016). An excerpt from the Tenure Holders' written submission to the BC EAO (Batnuni 2016), point 12 stated was as follows;

12. Batnuni curtailed offering wilderness horseback trips in the Davidson from 2013 to the present as the high number of drill rigs, traffic and noise in the area made hunting it impossible in the manner and fashion Batnuni had undertaken previously. The area that was formerly inaccessible to motorized traffic became a major thoroughfare for motorized traffic, both do too the exploration and due to hunting with motorized vehicles were hunting in that fashion had not been occurring previously.

Project Interface with GTC 601

See Appendix F, Figure F-1: Guide Outfitter Licence 601089 and the Blackwater Mine Site.

Mine Site

The mine site covers approximately 4,400 ha and overlaps 2990 ha or 6% of GTC 601 area, which covers approximately 54,000 ha (New Gold 2016). Appendix D demonstrates an overlay of the full GTC 601 in proximity to the mine site and off-site works. Appendix E demonstrates the full boundary of Certified Project Description and labels key project components:

- Mine Site;
- Freshwater Supply System (Tatelkuz Lake);
- Airstrip and Access Road;
- Kluskus-Ootsa FSR Realignment;
- Mine Access Road;
- Mine Access Routes; and
- Figure 2.7 Electrical Transmission Line Corridor (and re-route options). Note, the final route has subsequently been selected.

Off Site Facilities: Appendix F, Map 2-2, 2-3, 2.7

The Project off-site infrastructure is located in the NW corner of GTC 601 and includes:

- New 13km mine access road;
- A 15km freshwater supply system to Tatelkuz Lake;
- Airstrip and airstrip access road; and
- A 134.3 km, 230 kV electrical transmission line (transmission line or TL).

In addition to the disruption associated with construction and operation of facilities, the following factors identified as concerns:

- No Shooting Zone; located at the boundary of the defined mine site and work areas associated with off-site infrastructure, potentially limiting the area for firearm discharge;
- Gate locations (New Gold, 2015b; Appendix F Maps: A1-3, A1-4C);
- Road use, traffic volumes (noise, dust, emissions);
- Air strip use (noise);
- Visual aesthetic impact of industrial infrastructure in the wilderness landscape; and
- Dissatisfied clients who seek refunds or who provide poor service reviews impacting the reputation of the Tenure Holder.

4.0 Roles and Responsibilities

BW Gold has the obligation of ensuring that all commitments are met and that all relevant obligations are made known to mine personnel and site contractors during all phases of the mine life. A clear understanding of the roles, responsibilities, and level of authority that employees and contractors have when working at the mine site is essential to meet Environmental Management System (EMS) objectives.

Table 4-1 provides an overview of general environmental management responsibilities during all phases of the mine life for key positions that will be involved in environmental management. Other positions not specifically listed in Table 4-1 but who will provide supporting roles include independent environmental monitors, Independent Tailings Review Board and TSF qualified person.

Table 4-1: Blackwater Roles and Responsibilities

Role	Responsibility
Chief Executive Officer	The CEO is responsible for overall Project governance. Reports to the Board.
Chief Operating Officer	The COO is responsible for engineering and Project development and coordinates with the Mine Manager to ensure overall Project objectives are being managed. Reports to CEO.
General Manager (GM) Development	The GM is responsible for managing project permitting, the Project's administration services and external entities, and delivering systems and programs that ensure Artemis's values are embraced and supported, Putting People First, Outstanding Corporate Citizenship, High Performance Culture and Rigorous Project Management and Financial Discipline. Reports to COO.
Vice President (VP) Environment & Social Responsibility	The VP Environment & Social Responsibility is responsible for championing the Environmental Policy Statement and EMS, establishing environmental performance targets and overseeing permitting. Reports to COO.
Mine Manager	The Mine Manager, as defined in the <i>Mines Act</i> , has overall responsibility for mine operations, including the health and safety of workers and the public, EMS implementation, overall environmental performance and protection, and permit compliance. The Mine Manager may delegate their responsibilities to qualified personnel. Reports to GM.
Construction Manager (CM)	The CM is accountable for ensuring environmental and regulatory commitments/ and obligations are being met during the construction phase. Reports to GM.
Environmental Manager (EM)	The EM is responsible for the day-to-day management of the Project's environmental programs and compliance with environmental permits, updating EMS and MPs. The EM or designate will be responsible for reporting non-compliance to the CM, and Engineering, Procurement and Construction Management (EPCM) contractor, other contractors, the Company and regulatory agencies, where required. Supports the CM and reports to Mine Manager.
Departmental Managers	Departmental Managers are responsible for implementation of the EMS relevant to their areas. Report to Mine Manager.

Role	Responsibility
Indigenous Relations Manager	Indigenous Relations Manager is responsible for Indigenous engagement throughout the life of mine. Also responsible for day-to-day management and communications with Indigenous groups. Reports to EM.
Community Relations Advisor	Community Relations Advisor is responsible for managing the Community Liaison Committee and Community Feedback Mechanism. Reports to Mine Manager.
Environmental Monitors	Environmental Monitors (includes Environmental Specialists and Technicians) are responsible for tracking and reporting on environmental permit obligations through field-based monitoring programs. Report to EM.
Aboriginal Monitors	Aboriginal Monitors are required under EAC condition 17 and will be responsible for monitoring for potential effects from the Project on the Aboriginal interests. Aboriginal Monitors will be involved in the adaptive management and follow-up monitoring programs.
Employees and Contractors	Employees are responsible for being aware of permit requirements specific to their roles and responsibilities. Report to departmental managers.
Qualified Professionals and Qualified Persons	Qualified professionals and qualified persons will be retained to review objectives and conduct various aspects of environmental and social monitoring as specified in EMPs and social MPs.

BW Gold will employ a qualified person as an EM who will ensure that throughout the construction phase the EMS requirements are established, implemented and maintained, and that environmental performance is reported to management for review and action. The EM is responsible for retaining the services of qualified persons or qualified professionals with specific scientific or engineering expertise to provide direction and management advice in their areas of specialization. The EM will be supported by a staff of Environmental Monitors that will include Environmental Specialists and Technicians and by a consulting team of subject matter experts in the fields of environmental science and engineering.

During the Construction phase, EPC contractors and any sub-contractors, will report to the CM. The EPC contractor will be responsible for ensuring that impacts are minimized, and environmental obligations are met during the Construction phase. For non-EPC contractors, who will perform some of the minor works on site, the same reporting structure, requirements, and responsibilities will be established as outlined above.

BW Gold will maintain overall responsibility for management of the construction and operation of the mine site and will therefore be responsible for establishing employment and contract agreements, communicating environmental requirements, and conducting periodic reviews of performance against stated requirements.

The CM is accountable for ensuring that environmental and regulatory commitments/obligations are being met during the Construction phase. The EM will be responsible for ensuring that construction activities are proceeding in accordance with the objectives of the EMS and associated MPs. The EM or designate will be responsible for reporting non-compliance to the CM, and EPCM contractor, other contractors, the Company and regulatory agencies, where required. The EM or designate will have the authority to stop any construction activity that is deemed to pose a risk to the environment; work will only proceed when the identified risk has been addressed and concerns rectified.

During closure and post-closure staffing levels will be reduced to align with the level of activity associated with these phases. Prior to initiating closure activities, BW Gold will revisit environmental and health and safety roles and responsibilities to ensure the site is adequately resourced to meet permit monitoring

and reporting. The Mine Manager will maintain overall responsibility for management of Closure and Post-closure activities.

Environmental management during operation of the Project will be integrated under the direction of the EM, who will liaise closely with Departmental Managers and will report directly to the Mine Manager. The EM will be supported by the VP of Environment and Social Responsibility in order to provide an effective and integrated approach to environmental management and ensure adherence to corporate environmental standards. The EM will be accountable for implementing the approved MPs and reviewing them periodically for effectiveness. Departmental Managers (e.g., mining, milling, and plant/site services) will be directly responsible for implementation of the EMS and MPs and SOPs relevant to their areas. All employees and contractors are responsible for daily implementation of the practices and policies contained in the EMS.

During closure and post-closure, staffing levels will be reduced to align with the level of activity associated with these phases. Prior to initiating closure activities, BW Gold will revisit environmental and health and safety roles and responsibilities to ensure the site is adequately resourced to meet permit monitoring and reporting. The Mine Manager will maintain overall responsibility for management of Closure and Post-closure activities at the mine site.

Pursuant to Condition 19 of the EAC, BW Gold has established an Environmental Monitoring Committee (EMC) to facilitate information sharing and provide advice on the development and operation of the Project, and the implementation of EAC conditions, in a coordinated and collaborative manner. Committee members include representatives of the Environmental Assessment Office (EAO), UFN, LDN, NWFN, StFN, SFN, NFN, Ministry of Energy, Mines and Low Carbon Innovation, Ministry of Environment and Climate Change Strategy, and Ministry of Forests, Lands, Natural Resource Operations and Rural Development (FLRNORD).

Pursuant to Condition 17 of the EAC, Aboriginal Group Monitor and Monitoring Plan, BW Gold will retain or provide funding to retain a monitor for each Aboriginal Group prior to commencing construction and through all phases of the mine life. The general scope of the monitor's activities will be related to monitoring for potential effects from the Project on the Aboriginal Group's Aboriginal interests.

5.0 Compliance Obligations, Guidelines and Best Management Practices

5.1 Legislation

There is no federal legislation applicable to guide outfitting. Applicable provincial legislation includes:

- *Environmental Assessment Act*;
- *Land Act*;
- *Mines Act*;
- *Industrial Roads Act Regulations*;
- *Mineral Tenure Act*;
- *Mining Right of Way Act*;
- *Forest Range and Practices Act*; and
- *Wildlife Act*.

In addition, the following *Wildlife Act* Regulations apply to Guide Outfitting:

- *Wildlife Act* General Regulation;
- Commercial Activities Regulation; and
- Designation and Exemption Regulation.

5.2 Environmental Assessment Certificate

The THCMP addresses EAC Condition 38 and the plan has been prepared by a Qualified Person with a minimum of five years experience related to managing and mitigating potential conflicts between tenure holders in BC as required by the Condition.

The mitigation measures in the THCMP have been informed by other Blackwater management plans. These plans include:

- Wildlife Mitigation and Monitoring Plan (EAC Condition 23), which includes measures to mitigate and monitor potential effects on wildlife and wildlife habitat;
- Noise Effects and Vibration Effects Monitoring and Mitigation Plan (EAC Condition 41), which includes measures to mitigate noise and vibration effects;
- Accidents and Malfunctions Administration and Communications Plan (EAC Condition 36), which identifies notification protocol in the event of a project accident or malfunction;
- Community Liaison Committee and Community Effects Monitoring and Management Plan (EAC Condition 37), which establishes a Community Liaison Committee and program to monitor the potential adverse effects from the Project on communities; and
- Visual Effects Mitigation and Management.

5.3 Existing Permits

None of the Project's existing permits include conditions relating specifically to Guiding Territory Certificates.

5.4 A Practical Guide to Effective Coordination of Resource Tenures

The THCMP has been informed by *A Practical Guide to Effective Coordination Resource Tenures Guide* (Guide; Province of BC 2008a), as specifically referenced in Condition 38, which provides guidance when several activities authorized by the Crown occur on the same land base. The Guide is intended to assist tenure holders to prevent disputes and reduce conflict on Crown Land between holders of overlapping tenures.

The following excerpt from the Guide has been provided as a pre-cursor to further analysis and interpretation of its meaning, and application in the context of Condition 38.

"The Province adheres to a policy of integrated resource use, whereby several activities may occur on the same land base, provided they are coordinated and meet the requirements for long-term sustainable management and are consistent with BC Government goals.

"The Province makes every effort to ensure that resource management is coordinated, and that tenured activities will not negatively impact public interests or other rights. Tenures are written to be very specific about the rights or privileges they convey.

There is an expectation that tenure holders where applicable will make reasonable efforts to accommodate the interests of other resource users. Reciprocal accommodation is the foundation of successful, integrated resource use." (Province of BC 2008a, p.6)

The first step in reducing conflict is preventing it from occurring, by applying the eight guidelines. The guidelines are analyzed below in Section 6.0 (Analysis of 2008 Practical Guide to Effective Coordination of Resource Tenures).

The Tenure Holder and FLNRORD Wildlife Section Head have both presented beliefs that:

- A compatible use tenure and timing should not eliminate the opportunity to exercise tenure rights; and
- That the exclusive rights granted by GTC 601 are linked to the ability to exercise a specific business model, to the exclusion of other shared rights holders, or the acknowledgement of the changing realities.

The Crown grants conflicting tenures, which was the genesis of the referenced Practical Guide. Furthermore, the policy of integrated land use requires an analysis of other tenures on the land base prior to issuing a new overlapping tenure. There is no duty for the Crown to take up the cause of individual tenure holders except through the regulatory and land use planning regimes available. Tenure holders are asked to work together to avoid conflicts and reach resolution. Area based tenures must work with the resources available in the tenure area and in conjunction with the other rights granted by the Crown within that Area.

The Tenure Holder believes the ability to operate their "wilderness experience" business has been eliminated. Permitted industrial activities in the Davidson Zone of GTC 601, where the Tenure Holder prefers to operate, is incompatible with their business model. The Tenure Holder asserts that quantifying the success of a guide outfitter is more than wildlife harvest statistics, but also about the 'experience'; a Guide Outfitter who cannot deliver on the sold wilderness 'experience' is impacted. Incremental Crown decisions since 2005 have led to substantial road building, increased timber harvest and mineral development which have combined to erode pristine nature of the wilderness the business model. The Tenure Holder applies the logic that the environmental and aesthetic conditions of their tenure should remain unchanged through the course of time. Therefore, the financial value of a Guide Territory is at risk when tied to a marketed aesthetic and the business model is unable to adapt with the circumstances.

As the Guide summarizes, patterns of tenures over a particular area of land can become very complex and ultimately lead to changing land use expectations and demands, which do not align with expectations of years' prior.

5.5 Other Guidelines for Mitigation

In response to the potential effects pathways, the Tenure Holder has offered examples of further impact assessment and mitigation models summarized below. The Certificate Holder has assessed each of the models and analyzed the applicability of the models and where applicable, the specific proposed mitigations.

Guide Outfitters Association of BC (GOABC): Resource Tenure Matrix Guide for Compensation

The Tenure Holder provided the GOABC guide as a tool to evaluate the types of impacts to Guide Outfitters by offering a hierarchy of mitigations focused primarily on the construction and operation of linear infrastructure. While the framework of “short-term”, “medium term” and “long term” describes effects associated with planning for, constructing and operating a pipeline, it is distinctly different from a mine. While not directly applicable to mineral exploration and mining development, some principles may be ‘re-ordered’ to apply to a mine development process.

Following a full assessment of the sample mitigations, the Certificate Holder affirms that mitigations offered align with a significant portion of the applicable and suggested GOABC solutions such as:

- Hiring biologists for wildlife surveys;
- Providing detailed maps;
- Consulting on the hunting seasons and key areas;
- Notifying the outfitter of exploration activities;
- Altering plans to avoid key wildlife areas;
- Consulting on access and roads;
- Implementing firearm, noise, traffic and ORV restrictions for crews in remote camps;
- Hunting and fishing by construction staff prohibited;
- Implementing visual management strategies such as revegetation; and
- Involving the Guide Outfitter in access management planning.

Provincial Environmental Mitigation Policy for BC

The Tenure Holder has presented a diagram (Figure 5.5-1) demonstrating the traditional progression of impact mitigation hierarchy in the context of environmental planning, which is based on the same premise as the Provincial Environmental Mitigation Policy and focuses on:

- 1) Avoid
- 2) Minimize
- 3) Restore On-site
- 4) Residual Impacts before Offset
- 5) Offset

Principles of mitigation have been integrated throughout the Certificate Holder's assessment of potential impacts and mitigations in the EIS/Application.

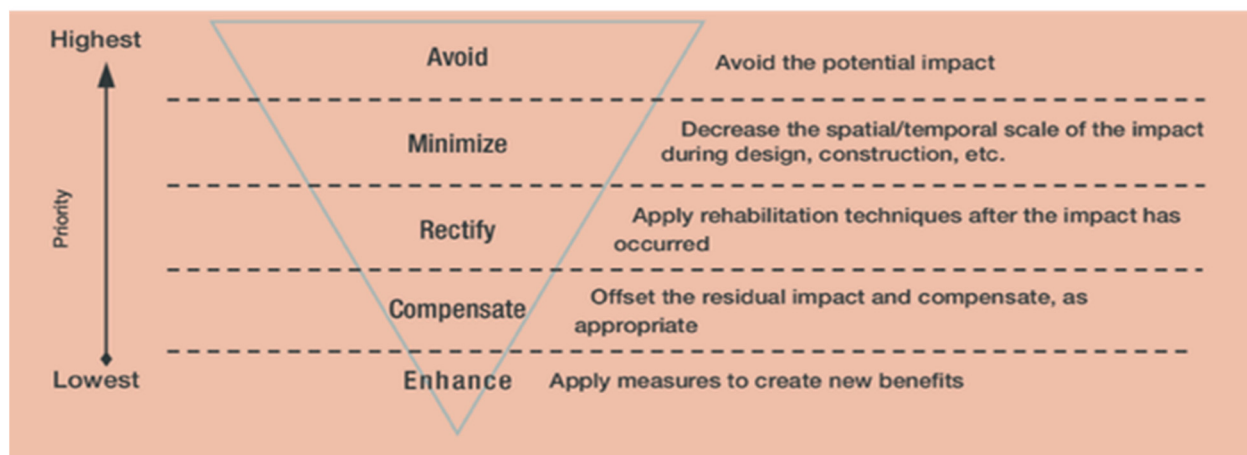


Figure 5.5-1: Environmental Impact Mitigation Hierarchy

The Tenure Holder has proposed avoidance as the primary mitigation, specifically that the Certificate Holder not operate its facilities or engage in any exploration or construction activities during the primary bear and moose hunting seasons (Batnuni November 2021). The Certificate Holder has evaluated that option, and notes that the EAC has been issued for the Project based on a 365 day/year operation. The Certificate holder has identified a range of other “minimize” mitigations in addition to communicating in a more detailed and direct manner about activities within GTC 601.

The Tenure Holder has offered the diagram as a suggestion that “Compensate” identified above should be treated as implying financial compensation for loss of business use. In the context, ‘compensation’ is applied in the environmental impact and mitigation planning context. Compensation takes the form of intentionally producing environmental gains elsewhere to counterweigh the negative impacts on nature. It does not have the financial context implied by the Tenure Holder.

The Tenure Holder has had the opportunity to engage meaningfully and provide creative mitigations or input on proposed mitigations. The Tenure Holder has declined offers by the Certificate Holder that address the mitigations that fall into the categories referenced directly above (i.e., to “rectify” with support for new trail building, camp identification or identification of new staging areas away from the active forest service road and off-site mine activities).

The Certificate Holder will continue to implement a range of mitigations, guided by Condition 38 which are believed to positively influence the potential effects on the Tenure Holder and will remain open to new proposed mitigations should any be proposed by the Tenure Holder in accordance with Condition 38.

6.0 Adaptive Management Framework

The Tenure Holder has expressed concern that many plans are in the early development stage, and the level of information sought is simply not available, such as specific equipment, or configurations to reduce noise transmission. The adaptive management framework allows for a progressive planning and mitigations to be developed, assessed, built upon and implemented, collaboratively, should the Tenure Holder from planning through implementation, testing and follow-up to address the effectiveness of mitigations.

The Tenure Holder operates a unique business operation with niche needs and expectations (e.g., suggesting no other industrial vehicles utilize the road network for weeks at a time). Mitigations proposed are a balance and benefit both the Tenure Holder and the environment and the use and enjoyment of the region by Aboriginal Groups and stakeholders broadly.

Mitigations offered fall into two categories; a) Those which are Tenure Holder specific, and b) Those which are monitored and reported out on as part of other Mitigation and Management Plan.

It is envisioned there is a connection between the Tenure Holder-specific mitigations which allow the Tenure Holder to contribute to plans and processes under development now, in order to influence the outcome and future management and mitigations in those related plans.

For example, the Tenure Holder has been provided the opportunity to identify locations for noise sensitivity testing, in order to better understand the potential impacts at those locations. The findings will assist in prescribing mitigation measures specific to the site and situation, but would be monitored and implemented through the Noise and Vibration Mitigation and Management Plan.

The THCMP is a living document that will evolve over time in response to monitoring results and incorporates adaptive management as follows:

- Plan
 - Conclude communications process with the Tenure Holder;
 - Exchanging future planning information; and
 - Preparing implementation schedule.
- Do
 - Implement communication process;
 - Implement mitigation measures;
 - Identify record keeping procedures; and
 - Prepare annual tenure holder report.
- Monitor / Assess
 - Implementation of tenure holder-specific mitigations; and
 - Complete and maintain monitoring records.
- Adjust
 - Follow up on the evaluation of monitoring results;
 - Review of the monitoring program in terms of effectiveness in detecting effects; and
 - Revise the THCMP as required.

7.0 Analysis of 2008 BC's A Practical Guide to Effective Coordination of Resource Tenures

Table 7-1 provides an analysis of how the work completed by BW Gold (and by New Gold previously) is consistent with the 2008 Guide. The table describes how the Guide has been applied by BW Gold and presumed to have been applied by the Tenure Holder upon acquisition of GTC 601.

Owners of the Project, and since 2020 BW Gold have engaged with the Tenure Holder since 2012 on the Project's mineral exploration program and related activities. As part of the environmental assessment process, BW Gold provided a communication log to the EAO detailing communication between the Tenure Holder and New Gold from 2012 until the 2016 submission of the Project Application for an Environmental Assessment Certificate / Environmental Impact Statement (New Gold 2015).

The December 1, 2021 Condition 38 Appendix C Engagement Report detailed all engagement on the Project Application Phase from January 2016 to December 2021.

The Certificate Holder provided both the 2012 – 2016 and 2017 – 2021 Engagement Logs to the Tenure Holder for feedback on September 3, September 10, and December 1.

Appendix G provides a timeline and the detailed engagement between the Tenure Holder and the Certificate Holder in the efforts to understand their business model and operations, understand the issues and concerns following those pathways to identify mitigations to address them.

Table 7-1: Application of the Eight Keys to Reduce Conflict (EAC Condition 38 b)

Key	Application of the Key
1. Due Diligence	<p>Understand the big picture:</p> <p>The Certificate Holder (previously New Gold) undertook an analysis of the Vanderhoof LRMP and the range of tenure holders within the region and determined that the Vanderhoof LRMP (Province of BC 2008b) allowed for the proposed land use activities associated with mineral exploration and potentially mine development.</p> <p>Tenure holder research existing tenure holders and understood that area-based tenures are not issued exclusive occupancy. Guide Outfitting and Trapping tenures for example, grant the Tenure Holder the flexibility and opportunity to utilize a vast area depending on the accessibility, desirability, location of animals and the experience/aesthetic.</p> <p>The Certificate Holder has a good relationship with the FSR Operator in the Kluskus and has participated in Road User meetings in an effort to support coordinating use of roads and access through control (gate) points for other users.</p> <p>Potential barrier and opportunities:</p> <p>The Vanderhoof LRMP (Province of BC 2008b) which was in place from 1997 was explicit in the overlapping land uses. The Tenure Holder would have (or should have) been aware that resource development was a possibility because it was not expressly prohibited in the Certificate Area, or even more specifically, in the Davidson. The Tenure Holders dependence on a recreational use designation of "Semi-Primitive Non-Motorized" for the Davidson did not consider the LRMP plan allowing forestry and other industrial uses, nor increasing forestry activity arising from pine beetle kill in the region nor the number or location of existing mineral tenures staked in the Certificate Area.</p> <p>The Certificate Holder believes there has been a systematic and detailed approach to regulatory, environmental and land use due diligence, including the engagement of experienced third-party firms to fulfill all technical evaluation and stakeholder and Indigenous consultation obligations.</p>

Key	Application of the Key
<p>2. Communicate early, often and honestly</p>	<p>Share your plans and business needs with other tenure holders as soon as you can.</p> <p>Effective communication is more than a one-time effort.</p> <p>Demonstrate honesty in your communication.</p> <p>New Gold engaged in extensive dialogue with the Tenure Holder from 2012, from the point of initial drilling exploration programs through the Environmental Assessment Application process in 2016. Exchanges from 2016 (Application Phase of the EA) to date are captured in Appendix C and demonstrate the progressive sharing of detailed project information, attempts to receive information and engage on project-specific mitigations to address impacts to the Tenure Holder.</p> <p>Project plans for exploration work were provided early in 2013 phase and consistent follow-up with information including mapping of the project and GTC 601 and GTC #500948 overlays occurred through 2016. Sets of project maps including GTC 601 and GTC #500948 with roads and project components have been provided nearly annually for different purposes (e.g., roads and gates, transmission line, access planning).</p> <p>In 2016 and 2018 the Tenure Holder and New Gold exchanged correspondence and held meetings with the objective the specific impacts to the Tenure Holder which resulted in them no longer offering hunts after 2015. A key objective was to understand the Tenure Holder's basis for financial compensation as the primary mitigation. Documents provided by the Tenure Holder on June 3, 2016, and discussed in 2018 were found to not be sufficient to demonstrate an impact, which was communicated to the Tenure Holder. This was communicated to the Tenure Holder on August 8, 2016 and September 7, 2018. The relationship entered a phase of transactional notification of New Gold's planned field work which aligned with the Tenure Holders' hunting season and other matters as they arose.</p> <p>The Certificate Holder Was contacted by the Tenure Holder shortly after Artemis' acquisition of BW Gold Mine (Fall 2020/ Winter 2021). BW Gold re-engaged with the Tenure Holder on the matter of project mitigations with two key objectives</p> <ul style="list-style-type: none"> (i) understand the Tenure Holder's business – operational / financial / industry and (ii) using the basis of understanding gained in part (i), address mitigation opportunities collaboratively. This process is fully documented with minutes and email exchanges as well as a detailed presentation. <p>The purpose of the Spring and Fall 2021 meetings between BW Gold and the Tenure Holder (and their advisors) was to:</p> <ul style="list-style-type: none"> • minimize the opportunities for misunderstandings; • enable BW Gold to better understand the guide outfitting business generally; • enable BW Gold to better understand the License Holder business model and specific services offered in GTC 601; • understand how the Tenure Holder's business model had adapted since hunts were reported by the Tenure holder (Batnuni, 2016) as not offered in the years since 2013 to 2016 and reported by the Tenure Holder (Batnuni 2021a); that hunts were not offered since 2016 to date; and • therefore, identify the kinds of impacts that BW Gold would be able to control through mitigation.

Key	Application of the Key
	<p>The meetings and calls resulted in the Tenure Holder documenting and summarizing the Tenure Holder's positions and the Certificate Holder provided answers to specific questions about "what mitigation opportunities are available".</p> <p>Various modes of communication and documenting the meetings as well as following up to ensure the documentation represented an accurate representation of the communications were all put in place to also minimize misinterpretation and misunderstandings.</p> <p>BW Gold had a desire to better understand the Tenure Holder's business and how it has been impacted directly by the mineral exploration activities as compared to other impacts such as forestry activity, changes to Non-Resident moose quotas, economic influences from the 2008 global recession and the pandemic, hunting regulations, general wildlife management practices, animal migration, and forest fires.</p> <p>A letter prepared by the Certificate Holder at the Tenure Holder's request (November 10, 2021 meeting) was sent on November 23, 2022 attempted to bridge past statements by the Tenure Holder that they had provided everything and the Certificate Holder had not responded. The Tenure Holder's response provided no new information. The Certificate Holder followed up again on December 14, 2021 to further summarize and detail the informational gaps which remained. The Tenure Holder expressed further reluctance to share information with BW Gold if financial compensation was not a principle matter of discussion (Email Batnuni to BW Gold February 2, 2022).</p> <p>In summary, since October, five meetings have been held to understand the business and impacts, potential mitigations and invite comment from the Tenure Holder on proposed mitigations. Notwithstanding, the Certificate Holder continues to attempt to obtain information from the Tenure Holder to allow the Certificate Holder to better understand any financial impact arising from the overlapping of tenures, in order to inform good-faith discussions regarding compensation that have been offered outside of Condition 38.</p> <p>Public documentation obtained by BW Gold indicates the Tenure Holder's business was influenced by other factors not immediately disclosed by the Tenure Holder ¹⁰. The Tenure Holder was offered the opportunity to share specific information and clarify potential impacts on multiple occasions. No clarification has been provided, except to criticize the attempts to seek information.</p> <p>The Tenure Holder has stated they are a small and informal operation and have not retained any past planning documentation of actual services performed in GTC 601 specifically. The Tenure Holder stated a Freedom of Information request to FLNRORD is required and had been completed (November 10, 2021) (FLNRORD 2021b). FLNRORD Wildlife Section Head reported on January 22, 2022, that all information he had available had been provided to the Tenure Holder.</p> <p>The Tenure Holder has responded that there is little point in providing information to the Certificate Holder if it is not for the purpose of financial negotiations. The Certificate Holder has indicated the information is necessary to understand how the business operated and to demonstrate an impact in order to inform good-faith discussions regarding compensation that have been offered outside of Condition 38.</p>

¹⁰ Business Sale MLS Listings 2009 and 2014, Forest Practices Board Complaint (2010) Decision 2012, 2009 and 2013 appeals of the moose allocation/quota to the Environmental Appeal Board for GTC 500948.

Key	Application of the Key
3. Seek to understand other perspectives	<p>Listen carefully and actively.</p> <p>Ask questions.</p> <p>Verify your understanding by paraphrasing and confirming what the other party has said.</p> <p>BW Gold (and previously New Gold) has been engaging with the Tenure Holder and its advisors since 2012 in a variety of methods from phone calls, emails, letters and face to face meetings through New Gold's Environmental and Community Relations staff and Executive members.</p> <p>The Tenure Holder has the opportunity to lead resident and non-resident hunters within GTC 601 for up to 11 months per year.</p> <p>In Spring 2021, BW Gold engaged with the Tenure Holder to conduct further research and receive operational information including verifiable data on business operations, quota and actual hunts sold and offered and financial impacts. BW Gold and the Tenure Holder had telephone calls, letters and emails and are pursuing information exchanges to further understand the business operation from 2005 to date.</p> <p>At introduction of the QP on September 3, 2021, BW Gold distributed a proposed schedule and approach for initiating Condition 38 and committed to distribute draft documents the following week. A Tenure Holder Advisor responded that the Tenure Holder would be unavailable for 8 weeks until the week of October 25, and the Advisors had no authority to respond in their absence.</p> <p>On September 10, 2021, BW Gold provided to the Tenure Holder (and Advisors) and FLNRORD the following Condition 38 supporting documents for their review and comment: Summary of Issues/Concerns, a Mitigation Measures Table (drawing on the Issues and Concerns), and an Engagement Report from 2017 forward. The documents were provided to paraphrase and confirm the key issues in order to connect them to new potential mitigations and to project actions BW Gold had committed to in order to avoid or minimize certain effects of most interest to the Tenure Holder.</p> <p>In acknowledgement that the Tenure Holder could not access materials and engage, a new proposed meeting schedule was distributed October 5, 2021, which moved engagement to November 2021. This aligned with messages from the Advisors that the Tenure Holder felt it could all be done in two days with a face-to-face meeting and an Executive decision maker from BW Gold. A call was held with the Tenure Holder (and Advisors) and FLNRORD the week of October 25 (and included a member of BW Gold's executive team) upon the Tenure Holder's return to discuss a schedule, explain the purpose and nature of the content of the Condition 38 documents sent September 10. FLNRORD provided comments on the draft Mitigation Matrix on November 1 (FLNRORD 2021b). It was agreed to a follow-up call (November 10) to discuss any outstanding questions and written comments were received from the Tenure Holder November 18.</p> <p>BW Gold sought specific clarification from the Tenure Holder on their primary desired mitigations, which have been consistently expressed as firstly, a full financial purchase of GTC 601 or the Business and secondly, as scheduling all project activities outside the months of April, May, June, September and October. This position expressed in 2016 and 2018 and in Spring, 2021 was reiterated in October and November 2021. At the February 2, 2022, meeting, the window of requested 'work stoppage' was</p>

Key	Application of the Key
	<p>characterized by the Tenure Holder verbally as six weeks, which has been inconsistent with past correspondence and verbal messages.</p> <p>Efforts occurred in 2016, 2018 and 2021 to receive information from the Tenure Holder to understand the business within GTC 601 and specific information was requested in April, 2021 (BW Gold 2021) and November 29, 2021, and December 14, 2021. Based on the information provided by the Tenure Holder in 2016, 2018 and 2021 (Batnuni 2021a, b), BW Gold communicated on multiple occasions that the information was insufficient to demonstrate impact to the business.</p> <p>BW Gold understands the Tenure Holder's position is driven by a combination of a misunderstanding about the recreational non-motorized vehicle designation which does not apply to industrial uses and the Tenure Holder experiencing cumulative changes in the region arising from increased forestry activity followed by mineral exploration activity; both of which were on the land base when the Tenure Holder acquired the Certificate Area. The Tenure Holder believes that the forest industry was able to effectively mitigate impacts in the past and FLNRORD notes that mitigations for mining and exploration as they relate to Guide Outfitting have yet to be resolved. Based on various legal proceedings, filings and written correspondence since 2016, the Tenure Holder has reported to have operated in GTC 601 eight years since its registration in 2007 following purchase in 2005 (2007, 2009, 2010, 2011, 2012, 2013, 2014, 2015).</p> <p>Therefore, separate to this Condition, BW Gold and the Tenure Holder are in an active exchange of information to ensure there is factual data and a clear understanding of the information necessary to fully understand the Tenure Holder's activities and the nature of the alleged impact.</p>
4. Recognize the balance of responsibility	<p>All tenure holders have the responsibility to communicate:</p> <p>The balance of responsibility is an important criterion for the certificate area under discussion. The Certificate Holder has demonstrated through the Engagement Report in Appendix C a consistent outreach and follow-up to the Tenure Holder to propose an approach to concluding Condition 38 planning, initiated with general discussion in mid-2021 and formal notification on September 3, 2021 and correspondence on September 10 and October 5 to update the proposed approach to accommodate the Tenure Holders presence in GTC 601 until late October. The Certificate Holder through the QP took on organizing meetings and seeking to obtain availability of the Tenure Holder and their advisors, and FLNRORD. The Tenure Holder and FLNRORD were invited to advise on meeting agendas and encouraged to identify creative with the Certificate Holder. Efforts to specifically advance Condition 38 THCMP planning through discussion of impacts and mitigations were routinely directed back to the point of compensation as the primary mitigation.</p> <p>Lastly, the Certificate Holder has proposed a communication process to share more detailed information about planned hunts in an effort to identify timing and location specific mitigations. The Tenure Holder has indicated trips can be booked years in advance but is hesitant to pursue such an approach, in favour of the "no work" mitigation. The Certificate Holder views this reciprocal information sharing as important to crafting site specific mitigations.</p>

Key	Application of the Key
	<p>Reasonable accommodation is a two-way street:</p> <p>“First in” does not have proprietary rights. A GTC provides for exclusive rights to guide in a territory, which does not grant the Tenure Holder exclusive right to exercise a business model, rights to wildlife or to “experiences”.</p> <p>As noted above, significant communication has occurred annually from 2013 through 2021, and from September through present to formulate materials to inform Condition 38. A summary of affects and concerns and potential mitigations were provided on September 10 and comments were invited. Through meetings on October 28 and November 10 and correspondence, the Tenure Holder presented only two mitigation options:</p> <ul style="list-style-type: none"> • financial compensation (suggested in the form of an outright purchase of GTC 601 or the Tenure Holder’s guiding business); or • ceasing all mining operations for 5 months per year. <p>For reasonable accommodation to be a two-way street, there needs to be some movement off the extreme positions. Closure of the mining operation for 5 months has been offered as the counterbalance to leverage compensation. The Tenure Holder has indicated that any information the Certificate Holder has requested to better understand the impacts to the Tenure Holder’s business impacts their ability for financial compensation. The Certificate Holder has noted that the Tenure Holder has 90% or more of their GTC available for use through a different business model.</p>
5. Understand the Limitations of Tenures	<p>Tenures are enabled and limited by provincial legislation:</p> <p>Develop a thorough understanding of your own tenure:</p> <p>As it relates to Condition 38, the <i>Land Act</i> as well as the <i>Wildlife Act</i>, <i>Forest and Range Practices Act</i> and <i>Mines Act</i> are key legislative and regulatory tools which affect the exercise of the rights associated with GTC 601 and BW Gold’s tenures. BW Gold’s tenures are granted for the exclusive use of specified activities which are then further refined through associated specific permits about how those activities will be exercised.</p> <p>BW Gold also has the right to the shared use of Forest Service Roads (with Road Use Agreements and Maintenance Agreements in place) and the ability to operate and maintain private accesses on Crown land for construction and operation purposes. <i>Land Act</i> tenures also grant statutory rights of way for exclusive infrastructure placement such as the water line and transmission line.</p> <p>Acquire a general understanding of other resource tenures:</p> <p>In the Tenure Holder’s case, they must adhere to the <i>Wildlife Act</i> and regulations, the conditions of GTC 601 and their Guide Outfitting License(s). The Tenure Holder has no <i>Land Act</i> rights or additional <i>Land Act</i> or other tenures within the Certificate area. The Tenure Holder previously held three other <i>Land Act</i> Tenures for hunting camps between their GTCs, which expired in 2015.</p> <p>The tenure holder has the exclusive right to guide hunters within GTC 601. A GTC does not grant the right to operate a specific business model. The Tenure Holder’s position to date is they cannot operate their preferred (more lucrative) business model in GTC 601 any longer and therefore “can not” utilize the remainder of GTC 601. The Tenure Holder offers motorized hunting experiences in their other GTCs.</p>

Key	Application of the Key
	<p>What options does the Tenure Holder have if they do not wish to fulfill their Certificate obligations or adjust their business model?</p> <p>The Tenure Holder can retain their GTC if there is no active guiding activity. Clause 59.1 of the <i>Wildlife Act</i>, within section 5.1.1.1 Non-use of Guiding Territory, contains provisions to address the matter. Upon application of a GTC holder who does not intend to consent to guiding in a year in the territory, the regional manager may give permission for the temporary or partial discontinuance of the use, or if there is no guiding in the territory for a year, to suspend, cancel or refuse to renew the guiding territory certificate. Suspension, cancellation or non-renewal of a GTC requires a hearing under Clause 61 of the <i>Wildlife Act</i> and is therefore not a foregone conclusion. FLNRORD reports having granted a section 59 discontinuance, likely since 2016, but this is unconfirmed.</p> <p>The Tenure Holder relies on utilizing other existing infrastructure, such as Forest Service Roads (FSRs) as accesses to wilderness hunting opportunities, however, the FSRs are constructed for industrial access under the <i>Forest and Range Practices Act</i> and utilized by industrial vehicles (authorized under the Vanderhoof LRMP (Province of BC 2008b) with no requirement to accommodate shared use by others, except legally registered road users, or the public in the case of public access FSRs.</p> <p>Much of what BW Gold learned from the limitation of tenures has been noted above - this education came from both reading the Certificate in general as well as in written and verbal exchanges with the Tenure Holder and FLNRORD as outlined in the minutes of meetings in 2021 and knowledge of the legislation.</p>
6. Make clear and meaningful agreements	<p>Agreements between tenure holders can be made to suit the need.</p> <p>Agreements should anticipate future circumstances.</p> <p>Consider how disagreements will be resolved.</p> <p>BW Gold, analyzed the historical communications with the Tenure Holder and proposed to enter a communications process potentially resulting in a communication protocol, to:</p> <ul style="list-style-type: none"> • exchange ‘immediate’ contact information to enable active notifications or planning outreach, other than through correspondence; • receive from The Tenure Holder specific FSR use and trail use in the Certificate area to understand specific areas of potential interface with BW Golds future planned activities; • guide opportunities in 2022-2024 for The Tenure Holder to provide input into named environmental studies (led by BW Gold’s QPs) to enable Tenure Holders interests to be considered in the program design and share the information learned and how it would be utilized in mitigation measures (e.g., Noise and Vibration Management Plan, Wildlife Studies); and • provide advice and gain a greater understanding around future access needs through involvement in the Access Management Working Group. <p>In February 2022, the Tenure Holder was included in the formal invitation that went to stakeholders requesting confirmation of interest in participation in the Access Management Working Group.</p>

Key	Application of the Key
7. Make the agreement real during operations	<p>The Tenure Holder declined to progress discussions to advance a communication protocol.</p> <p>BW Gold will undertake the Communication Process set out in Section 10.</p>
8. Realistically assess and adapt	<p>A process will be undertaken annually to review the Mitigation Measures and the THMP to evaluate the completion of mitigations and identify if any new actions may be taken for the next time period.</p> <p>As noted in section 10.1 BW Gold will consult with the Tenure Holder and FLNRORD on an updated THCMP.</p> <p>BW Gold has provided detailed responses to the Tenure Holder's comments on draft this plan and on the Section 9: Mitigation Matrix. A separate response document will track the comments and responses on the past Mitigation Matrices. (Sept 10, Dec 1), while the new Section 9 will reflect the THCMP Mitigations.</p>

8.0 Consultation with Tenure Holder

In addition to the Practical Guide in the previous section, the Condition 38 Report must comply with EAC Condition 4, which states the following:

Consultation

Where a condition of this Certificate requires the Holder consult a particular party or parties regarding the content of a plan, program or other document, the Holder must, to the satisfaction of the EAO:

- a. provide written notice to each such party that:
 - i. includes a copy of the plan, program or other document;
 - ii. invites the party to provide its views on the content of such plan, program or other document; and
 - iii. indicates:
 - i. if a timeframe for providing such views to the Holder is specified in the relevant condition of this Certificate, that the party may provide such views to the Holder within such time frame; or
 - ii. if a timeframe for providing such views to the Holder is not specified in the relevant condition of this Certificate, specifies a reasonable period during which the party may submit such views to the Holder;
- b. undertake a full and impartial consideration of any views and other information provided by a party in accordance with the timelines specified in a notice given pursuant to paragraph (a);
- c. provide a written explanation to each such party that provided comments in accordance with a notice given pursuant to paragraph (a) as to:
 - i. how the views and information provided by such party to the Holder have been considered and addressed in a revised version of the plan, program or other document; or
 - ii. why such views and information have not been addressed in a revised version of the plan, program or other document;
- d. maintain a record of consultation with each such party regarding the plan, program or other document; and
- e. provide a copy of such consultation record to the EAO, the relevant party, or both, promptly upon the written request of the EAO or such party. The copy of such consultation record must be provided to the EAO, relevant party, or both, no later than 15 days after the Holder receives the request for a copy of the consultation record, unless otherwise authorized by the EAO.

The Engagement Report (Appendix C) reports the period January 2016 to date which aligns with the Application Stage of the Environmental Assessment Process. In compliance with Condition 4 engagement through the Appendix C informed mitigations reflected across a range of Environmental Management Plans in addition to this plan. Condition 4 defines the elements of the consultation process; which is focused on the process of sharing programs, processes or documents and providing an opportunity for input, providing a timeframe for response and performing a full and impartial consideration of the views, and how they were utilized and if not, why not and lastly, keeping a record of the engagement.

Compliance with 38c

- c. provide a written explanation to each such party that provided comments in accordance with a notice given pursuant to paragraph (a) as to:
 - i. how the views and information provided by such party to the Holder have been considered and addressed in a revised version of the plan, program or other document; or
 - ii. why such views and information have not been addressed in a revised version of the plan, program or other document.

The Tenure Holder and FLNRORD were provided the opportunity to give verbal and written advice on the issues summary and proposed mitigations on September 10, 2021. Meetings were held on October 28 and November 10 and effort made to review and discuss the impacts and mitigations proposed. The Tenure Holder provided verbal feedback that their business operations focused on wilderness experiences were in conflict with a mine and they felt no mitigations could resolve that overarching issue. BW Gold received written comments from FLNRORD on November 1, 2021 (FLNRORD 2021b) and from the Tenure Holder on November 17, 2021 (Batnuni 2021b).

The comments were evaluated, and responses were provided to FLNRORD (November 30, 2021) and the Tenure Holder (December 1) indicating where new mitigations had been identified as a result of the comments, existing mitigations were modified or there was no change. Certificate Holder responses from the Tenure Holder and advice from FLNRORD were incorporated into the December 1 Mitigation Measures Matrix (Appendix D) which is now incorporated in Section 9 Mitigation Measures. Where the Certificate Holder could not utilize a comment, or the comment was not directed at the specific mitigation, this response was included in the table.

The Certificate Holder constructed the body of Condition 38 THCMP based upon careful consideration of the views, concerns and expressions of interest received from the Tenure Holder and FLNRORD to that point. The draft Condition 38 and the updated Engagement Record (Appendix C) and Mitigation Measures and Comment Table (Appendix D) were released on December 1 with an invitation to meet to review the materials as soon as possible and to receive written responses. FLNRORD provided written comments on December 7, 2021, and the Tenure Holder provided written comments on January 13, 2022.

The Certificate Holder responded as follows:

- Condition 38 Plan responses were released to FLNRORD/Tenure Holder on February 2, 2022. The purpose and format of the document was reviewed at a meeting that date.
- The updated Mitigation Measures Matrix (Section 9, formerly Appendix D) and a detailed Mitigation Measures Response table combining FLNRORD/Tenure Holder responses in one format were provided on February 11, 2022. The new format and purpose of the Mitigation Measures Response Table was discussed on December 22 to assist the Tenure Holder and FLNRORD to understand how to view the response to their interests and concerns.

Lastly, the Certificate Holder sought to enter into a clear and meaningful agreement with the Tenure Holder (Practical Guide (6)) in the form of a communication protocol. The proposal was made in writing on September 10 and integrated into the project Mitigation Measures matrix. Despite discussing on at least two occasions and maintaining the offer in the Certificate Holder's mitigation approach as a means of implementing Condition 38, the Tenure Holder did not accept the proposed approach.

Advice received from the EAO and the Tenure Holder's disinterest in a formalized protocol, resulted in that option being removed and replace with a communication process.

Condition 4(d) Reporting

- d. maintain a record of consultation with each such party regarding the plan, program or other document; and

The Certificate Holder retains a detailed log of all communications in the form of letters, emails, telephone logs and meeting notes to inform the engagement log and reporting process. Through this detailed tracking, the Certificate Holder is able to share documents with the Tenure Holder, in some cases to refresh the Tenure Holder's records of past documents and information shared previously.

The engagement log may be filtered by types of meetings, key themes and proposed mitigations, and key follow-up topics, for example. It demonstrates that the single most often proposed mitigation by the Tenure Holder has been compensation.

The post 2016 engagement report demonstrates clusters of activity in the themes below:

- EAO Application phase information exchanges, Spring 2016.
- Seeking to discuss impacts and financial compensation and attempts by the Certificate Holder to receive specific information from the Tenure Holder (Q2/Q3 2016, Q2/Q3 2018, Q2/Q3 2021).
- Fall field work notifications and responses associated with the notification (annually).
- Transmission Line engagement outreach and notifications (and responses seeking 'meaningful' engagement, with no comment on impacts or route options).
- Condition 38 development, September 3, 2021, to date.

A comprehensive Engagement Report from 2016 – 2022 demonstrating consultation activity between New Gold / BW Gold and the Tenure Holder is provided in Appendix C. The Appendix identifies face to face meetings, virtual meetings, telephone calls, emails and letters and summarizes key themes, mitigations and action items.

A separation has been drawn within Condition 38 of two periods of time:

1. Exploration and EA Pre-Application Phase (2012 – 2015) - which related primarily to Crown permits in connection with mineral exploration and not the EA process to which Condition 38 applies; and
2. Application Phase of the Environmental Assessment process (January 2016 forward).

On November 17, 2021, the Tenure Holder provided their own summary of engagement on the Project, containing 59 items from 2016 to date, and other entries back to 2012. (Batnuni 2021b) Of the 59, 39 were captured already, 3 were identified for inclusion (2018) and the remaining 17 were communication between the Tenure Holder and a third party, to which New Gold or BW Gold was not party or BW Gold had no record of the specific exchange.

In January 2022, the Tenure Holder's log was further researched with the Certificate Holder and 3 additional entries were identified and added to the forthcoming Engagement Report.

9.0 Mitigation Measures

The Certificate Holder developed mitigation measures based on:

- An analysis of the concerns expressed by the Tenure Holder through the review of materials exchanged with the Tenure Holder for the past ten years; and
- Comments received from the Tenure Holder and FLNRORD on draft mitigations shared on September 10, 2021, discussed in November, December and January and comments received in January 2022; and
- An analysis of how the affect was addressed more globally in the EAC Conditions and where monitoring and mitigation measures are identified through other plans.

The potential affects assessed in the Application/EIS and considered in this THCMP are:

- Noise (all sources);
- Air quality;
- Visual quality;
- Wildlife impacts (abundance, health, mortality); and
- Access Management (Vehicle traffic and associated nuisances, gates and access).

In addition to the environmental effects of concern to the Tenure Holder, impacts to the business arising from those affects are sought to be mitigated through information sharing, communication and contribution to studies and planning processes. Thereby the Tenure Holder has an opportunity to provide input into the areas of most interest and have fuller information when choosing to undertake activities within GTC 601 in any given year and likewise the Certificate Holder has more specific information regarding the Tenure Holder's presence in GTC 601. Tenure holder specific mitigations include:

- Contributing to noise and vibration modelling locations;
- Contributing to access management planning through the Access Management Working Group;
- Contributing to Wildlife studies; and
- Stronger understanding of the Project and implications to support planning.

Refer to Appendix D: Mitigation Measures.

Prior to the THCMP process, the following mitigation measures were undertaken as the related to noise abatement:

- In 2013, New Gold accommodated request that exploration program avoid the coral areas near Chedakuz Creek.
- In 2014, New Gold adjusted the drilling program based on discussions to avoid impacts on Spring Bear Hunt as well as adjusted program in the fall of 2014 and assisted with awareness / impediments to curtail recreational motorized vehicle use.
- In 2015, New Gold provided road and gate maps to the Tenure Holder and made arrangements for the Tenure Holder to access gate keys to facilitate road use. (New Gold 2015b) The Tenure Holder remains frustrated with the existence with gates, and this is expected to be a topic at the Access Management Working Group.

Previous to 2021, the following mitigation options were also highlighted:

- Gun safety protocols, which all parties would adhere to.
- Ceasing activity in advance of a hunt.

The Mitigation Measures are expected to function as part of a living annual action plan which is anticipated to be updated and reported out annually as actions are completed or evolve and as new opportunities arise.

10.0 Reporting and Record Keeping

10.1 Environmental Assessment Certificate

Condition 5 of the EAC sets out reporting requirements. BW Gold will submit a report to the attention of the EAO and Aboriginal Groups on the status of compliance with the EAC at the following times:

- a. At least 30 days prior to the start of Construction;
- b. On or before March 31 in each year after the start of Construction;
- c. At least 30 days prior to the start of Operations;
- d. On or before March 31 in each year after the start of Operations;
- e. At least 30 days prior to the start of Closure;
- f. On or before March 31 in each year after the start of Closure until the end of Closure;
- g. At least 30 days prior to the start of Post-Closure; and
- h. On or before March 31 in each year after the start of Post-Closure until the end of Post-Closure.

BW Gold will submit reports to EAO, Aboriginal Groups, and the CLC, within the timelines specified in Condition 5. The reports will report on status of compliance with the Project's EAC.

11.0 Communication Process

The Certificate Holder will follow the process below to implement a two-way communication method to implement this THCMP. The process is designed to allow the two way flow of information, and seek to ensure that the parties jointly respect that 'time is of the essence' in their respective business operations:

1. Provide the Tenure Holder with a key contact within BW Gold who will be responsible for maintaining the record of engagement and ensuring coordination of internal responses and actions are tracked below.
2. Inform the Tenure Holder of an information need and invite the Tenure Holder to respond in writing with the desired information, and a timeline for response.
3. Invite the Tenure Holder's input in connection with processes and studies identified within the Mitigation Measures matrix within the timelines provided by the Certificate Holder at the time.
4. The Tenure Holder will be provided Information in response to reasonable requests for specific information within a stated timeline of the request.
5. BW Gold will seek to receive from the Tenure Holder a map which indicates the specific trails and roads utilized for hunting activity.
6. BW Gold will seek to receive information from the Tenure Holder regarding their activity and use of specific areas within GTC 601 in April – May and September – October. BW Gold understands that hunts may be booked for years in advance, and in that spirit, advising BW Gold of scheduled Tenure Holder planned hunts as early as possible each year, and ideally two times annually will facilitate dialogue about BW Gold planned activities outside the mine site. The Tenure Holder will be provided 30 days to share the information to BW Gold and information may be updated at any time upon request by the Tenure Holder.
7. The Tenure Holder will be requested to provide a third party or alternative contact for information sharing purposes 11 months per year, to enable the tenure holder's input and contributions to processes which must also take into account multiple stakeholders, qualified professionals or seasonal and environmental constraints.
8. The Certificate Holder will seek to meet with the Tenure Holder (virtually or by telephone) up to three times annually, to discuss the progress of the THCMP implementation (utilizing the Mitigation Measures table as a guide), any potential affects or concerns experienced by the Tenure Holder and proposed mitigations.
9. Where the Tenure Holder is contributing to a plan or program advice, in writing, the Tenure Holder will receive a response as to how their advice was considered and how it informed a process or activity within 30 days of receiving the response.
10. Where the Tenure Holder is contributing to the inputs of a study, the results of that study associated with the Tenure Holder's contributions will be shared with the Tenure Holder. Associated mitigation actions arising from the work will be shared with the Tenure Holder for information and written feedback in accordance with Section 13.
11. The Certificate Holder will response to the Tenure Holders proposed mitigations within 30 days, as outlined in Section 13, Evaluation and Adaptive Management.
12. A Monitoring Report will be provided to the Tenure Holder for a 30-day review period who will be invited to respond to BW Gold.

12.0 Annual Monitoring Report

BW Gold will prepare an annual THCMP Monitoring Report on the status of the implementation of the Tenure Specific mitigations contained in the Mitigation Measures (Section 9) and the implementation of the Communication Process (Section 11). Any recommended changes to the monitoring or reporting process will occur in accordance with the Tenure Holder Communication Process (Section 11) and the Evaluation and Adaptive Management process (Section 13). The Monitoring Report will be provided to the Tenure Holder for a 30-day review period who will be invited to respond to BW Gold.

13.0 Evaluation and Adaptive Management

The Mitigation Measures Table includes a combination of Project Mitigations associated with specific Management Plans and Tenure Holder-Specific mitigations. Tenure Holder-Specific Mitigations are the primary mechanisms for monitoring and reporting on this plan. It is envisioned that the Mitigation Measures Table may be utilized in part as an active 'action plan' between the Parties. Enabling the evolution of the table to reflect completed tasks and integrate new concepts allowing for a flexible approach through the project phases.

Any mitigation amendments or new mitigations proposed by the Tenure Holder will be analyzed and may explored with the Tenure Holder further to understand the intended objective and implications.

BW Gold will provide a response to the Tenure Holder on the decision and the reasons for decision within 30 days of receiving the comments or following the conclusion of exploratory dialogue as referenced. New and amended mitigations will be incorporated into the Mitigations Measures Table and mitigations which have been completed will be marked as such.

The THCMP will be updated to reflect changes in the Tenure Holders' business activities as it relates to active exercise of their GTC #601039, regulations or best management practices.

14.0 Plan Revision

The THCMP will be reviewed annually for the first three years and may be updated every year, or not at all if the management and mitigation measures are found to be robust by a Qualified Person.

Proposed updates of the THCMP will be provided to the Tenure Holder and FLNRORD for 30-day review and comment. BW Gold will have a 30-day period for response and will seek to provide the final updated THCMP to the Tenure Holder, FLNRORD and EAO by day 75.

The plan and any amendments thereto, will be implemented to the satisfaction of a Qualified Person throughout Construction and Operations and to the satisfaction of the EAO.

15.0 Qualified Persons

This management plan has been prepared and reviewed by, or under the direct supervision of, the following Qualified Person:

Prepared by:

A handwritten signature in blue ink, appearing to read "Ellen Frisch", is positioned above a horizontal blue line.

Ellen Frisch

Principal, Ellen Frisch and Associates

16.0 References

Definitions of the acronyms and abbreviations used in this reference list can be found in the Acronyms and Abbreviations section.

Legislation

Environmental Assessment Act, SBC 2018, c. 51.

Forest Planning and Practices Regulation, BC Reg. 14/2004.

Land Act, RSBC 1996, c. 245.

Mines Act, RSBC 1996, c. 293.

Mining Right of Way Act, RSBC 1996, c. 294.

Wildlife Act, RSBC 1996, c. 488.

Wildlife Act, *Wildlife Act* Commercial Use Regulations (add final citations)

Secondary Sources

AMEC. 2013 *Non-Traditional Land Use - 2013 Baseline Report*. Prepared for New Gold Inc. by AMEC Environment & Infrastructure: Vancouver, BC.

Batnuni 2016. (Batnuni Lake Guide and Outfitters), *Reply of Batnuni Lake Guide and Outfitters Ltd. to Application for an Environmental Assessment Certificate for the Blackwater Gold Project Written Submission*. February 19, 2016, prepared by K. Church, Morelli Chertkow.

Batnuni 2021a. Letter to BW Gold from Batnuni. Response to BW Gold letter of April 5, 2021, conveying business operation information. April 9, 2021, prepared by K. Church, Morelli Chertkow,

Batnuni 2021b. Correspondence from Batnuni to BW Gold, commenting on three documents provided by BW Gold; the Summary of Issues, Call Log and Proposed Mitigation Table for Condition 38. November 17, 2021 conveyed by K. Church, Morelli Chertkow.

Batnuni 2021c. Correspondence from Batnuni to BW Gold, "Additional Business Information Requested", November 29, 2021, prepared by Batnuni.

Batnuni 2022a. Letter to BC EAO from Batnuni. "Response to Artemis/BW Gold draft Condition 38 Plan", January 7, 2022. Prepared by Batnuni.

Batnuni 2022b, Letter to BC EAO from Batnuni. "Batnuni Lake Guide and Outfitters Response to Certificate Holder's Comments on Condition No. 38. April 14, 2022, prepared by Batnuni.

BW Gold 2021. Meeting Minutes of Batnuni and Artemis conference call on April 12, 202, prepared by K. Poettker, BW Gold.

BC EAO. 2019a. *Assessment Report for Blackwater Gold Mine Project (Blackwater) With respect to the Application by New Gold Inc. for an Environmental Assessment Certificate pursuant to the Environmental Assessment Act*, S.B.C. 2002, c.43. Prepared by the Environmental Assessment Office. May 17, 2019.

BC EAO. 2019b. *Summary Assessment Report for Blackwater Gold Mine Project (Blackwater) With respect to the application by New Gold Inc. for an Environmental Assessment Certificate pursuant to the Environmental Assessment Act*, S.B.C. 2002, c. 43.

- BC EAO. 2019c. *In the matter of the ENVIRONMENTAL ASSESSMENT ACT S.B.C. 2002, c. 43 (the Act) and in the matter of an Application for an Environmental Assessment Certificate (Application) by New Gold Inc. (Proponent) for the Blackwater Gold Project Environmental Assessment Certificate # M19-01.*
- BC FLNRORD 2021a. Email to BW Gold QP providing guide outfitting facts in WMU 6-1. October 4, 2021. Prepared by T. Larden, Head, Fish and Wildlife.
- BC FLNRORD 2022b. Email to BW Gold, comments on Draft Condition 38 Mitigation Table, November 1, 2021. Prepared by T. Larden, Head Fish and Wildlife.
- CEA Agency. 2019. *Decision Statement Issued under Section 54 of the Canadian Environmental Assessment Act, 2012* to New Gold Inc. c/o Ryan Todd, Director, Blackwater Project Sunlife Plaza Suite 610, 1100 Melville Street Vancouver, British Columbia V6E 4A6 for the Blackwater Gold Project.
- FPB 2012. Forest Practices Board of BC, Davidson Creek Access Management, Complaint Investigation #100971, FPB/IRC/183, May 2012.
- New Gold 2015a, Project Application for an Environmental Assessment Certificate / Environmental Impact Statement.
- New Gold 2015b. Letter to K. Church on behalf of Batnuni, J.Linnell sharing maps of gate locations, history of correspondence and process to unlock. September 25, 2015, Prepared by C. Gouger, Community Manager, New Gold.
- New Gold 2016. Letter to BC EAO regarding “*Proposed Blackwater Gold Project and Guide Outfitter Certificate #601039*”, April 29, 2016, prepared by T. Bekhuys, VP, New Gold..
- Province of BC 2008a. *A Practical Guide to the Effective Coordination of Resource Tenures*. 3rd edition, Ministry of Agriculture and Lands, Ministry of Forests and Range, Ministry of Environment and Project Management Office: Integrated Land Management Bureau.
- Province of BC 2008b. *Vanderhoof Land and Resource Management Plan (LRMP) Background Document and Reference Information for the Access Management Plan for Forest Recreation: 2008*, Integrated Land Management Bureau.

Appendix A Concordance Table with Environmental Assessment Certificate #M19-01 (June 2019)

Appendix A: Concordance Table with Environmental Assessment Certificate #M19-01 (June 2019)

Table A-1: Environmental Assessment Certificate #M19-01 Conditions and Location in the Tenure Holder Communications and Mitigations Plan

Condition #	Requirement	Location in the Plan
2	<p>Plan Development</p> <p>Where a condition of this Certificate requires the Holder to develop a plan, program or other document, any such plan, program or other document must, at a minimum, include the following information:</p> <p>a) purpose and objectives of the plan, program or other document;</p>	Section 2
	b) roles and responsibilities of the Holder and Employees;	Section 3, Table 3-1
	c) names and, if applicable, professional certifications and professional stamps/seals, of those responsible for the preparation of the plan, program, or other document;	Section 12
	d) schedule for implementing the plan, program or other document throughout the relevant Project phases;	Section 2
	e) means by which the effectiveness of the mitigation measures will be evaluated including the schedule for evaluating effectiveness;	Section 10
	g) schedules and methods for the submission of reporting to specific agencies, Aboriginal Groups and the public and the required form and content of those reports; and	Section 9
	h) process and timing for updating and revising the plan, program or other document, including any consultation with agencies and Aboriginal Groups that would occur in connection with such updates and revisions.	Section 11

Condition #	Requirement	Location in the Plan
3	<p>Adaptive Management</p> <p>Where a condition of this Certificate requires the Holder to develop a plan, program or other document that includes monitoring, including monitoring of mitigation measures or monitoring to determine the effectiveness of the mitigation measures, the Holder must include adaptive management in that plan. The objective of the adaptive management is to address the circumstances that will require the Holder to implement alternate or additional mitigation measures to address effects of the Project if the monitoring shows that those effects:</p> <ul style="list-style-type: none"> a) are not mitigated to the extent contemplated in the Application. b) are not predicted in the Application; or c) have exceeded the triggers identified in paragraph g) of this condition. <p>The adaptive management in the plan must include at least the following:</p> <ul style="list-style-type: none"> d) the monitoring program that will be used including methods, location, frequency, timing and duration of the monitoring; 	Section 5, Section 10
	e) the baseline information that will be used, or collected where existing baseline information is insufficient, to support the monitoring program;	No baseline information is required to be collected.
	f) the scope, content and frequency of reporting of the monitoring results;	Section 10. The THCMP monitors and reports on the effectiveness of mitigation measures.
	g) the identification of qualitative and quantitative triggers, which, when observed through monitoring required under paragraph d), will require the Holder to alter existing, or develop new, mitigation measures to avoid, reduce, and/or remediate effects;	There are no triggers.
	h) the methods that will be applied to detect when a numeric trigger, or type or level of change referred to in paragraph g), has occurred.	There are no numeric triggers.
	i) a description of the process for and timing to alter existing mitigation measures or develop new mitigation measures to reduce or avoid effects;	Section 10
	j) identification of the new and/or altered mitigation measures that will be applied when any of the changes identified in paragraphs a) to c) occur, or the process by which those will be established and updated over the relevant timeframe for the specific condition;	Section 10

Condition #	Requirement	Location in the Plan
	k) the monitoring program that will be used to determine if the altered or new mitigation measures and/or remediation activities are effectively mitigating or remediating the effects and or avoiding potential effects; and	Section 10
	l) the scope, content and frequency of reporting on the implementation of altered or new mitigation measures.	Section 10
	If there are any requirements or mitigation measures required in the plan, program or other document for which adaptive management, or elements of adaptive management listed in paragraphs d) to l) are assessed to be not appropriate or applicable, the plan must include identification of those requirements and measures, and the rationale for that assessment.	The mitigation measures are largely reliant on communications between the parties.
	d) maintain a record of consultation with each such party regarding the plan, program or other document; and	
	e) provide a copy of such consultation record to the EAO, the relevant party, or both, promptly upon the written request of the EAO or such party. The copy of such consultation record must be provided to the EAO, relevant party, or both, no later than 15 days after the Holder receives the request for a copy of the consultation record, unless otherwise authorized by the EAO.	
38	Tenure Holder Communication and Mitigation Plan and Report The Holder must retain a Qualified Person with at least five years' experience related managing and mitigating potential conflicts between tenure holders in BC, to develop a plan to address potential adverse effects of the Project on the business conducted under guide outfitter license #601039. The plan must be developed in consultation with FLNRORD and the holder of the guide outfitter license #601039 (License Holder).	The plan has been prepared by a Qualified Person with at least five years' experience related managing and mitigating potential conflicts between tenure holders in BC (Section 12)
	The plan must include at least the following:	Section 8.0, Section 9.0
	a) mitigation measures to address potential for adverse effects to the License Holder's operations, including but not limited to:	
	i) using noise abatement measures and consideration of scheduling Project activities to limit disruption to the guiding operations;	
	ii) providing the construction schedule to the License Holder 30 days prior to the planned commencement of Construction;	Section 8.0, Section 9.0
	b) an analysis of how the consultation with the License Holder and mitigation and accommodation measures in the plan are consistent with BC's A Practical Guide to Effective	Section 6, Appendix B

Condition #	Requirement	Location in the Plan
	Coordination of Resource Tenures (2008, or as updated or replaced from time to time);	
	c) a detailed description of the consultation undertaken with the License Holder regarding the mitigation measures in paragraph a) and analysis in paragraph b), including a report on concerns raised by the License Holder and the Holder's response to those concerns; and	Section 7, Appendix C
	d) the means by which the Holder will monitor and report on the effectiveness of the mitigations referred to in paragraph a).	Section 10
	The Holder must provide the draft plan that was developed in consultation with FLNRORD and the License Holder to the EAO and FLNRORD a minimum of 90 days prior to the planned commencement of Construction, unless otherwise listed in the Document Submission Plan required by Condition 10 of this Certificate.	Submitted to EAO on 1 December 2021
	The Holder must not commence Construction until the plan and the report have been approved by the EAO, unless otherwise authorized by the EAO.	
	The plan and any amendments thereto, must be implemented to the satisfaction of a Qualified Person throughout Construction and Operations and to the satisfaction of the EAO.	

Appendix B 2008 Practical Guide for Effective Coordination of Resource Tenures

Appendix B: 2008 Practical Guide for Effective Coordination of Resource Tenures

Table B-1: Guidelines for Effective Coordination of Resource Tenures

1. Due diligence
<ul style="list-style-type: none">• Understand the big picture: Be familiar with the applicable land-use plans for the area, any special management measures required, concerns raised through government pre-tenure referrals and local First Nations' interests. Also, be sure that you are aware of the long-term objectives of your company and any policies or operating principles that apply to stakeholder relations and land use integration.• Potential barriers and opportunities: Research other activities and tenure holders in the area. Consider both; a) the potential barriers that will need to be addressed to achieve your objectives and, b) the opportunities to benefit from the activity of other tenure holders (e.g., coordinated access, camps etc.). Determine; a) who is on the land base (i.e., authorized users, First Nations, public user groups) and, b) where by accessing the data bases and maps (ILRR, etc.) that area available through FCBC.• Consultation obligations or expectations: Find out what stakeholder consultation is required for your tenure or applicable agreements. Also determine what might be expected by other tenure holders.
2. Communicate early, often and honestly
<ul style="list-style-type: none">• Share your plans and business needs with other tenure holders as soon as you can: Don't wait until the last minute when it might too difficult or expensive for them to adjust. Some operations are very flexible whereas others may need a longer lead time.• Effective communication is more than a one-time effort: Don't rely on a single phone call or letter to meet your communications needs. Use more than one approach and take the time to ensure that you both; a) provide and b) receive the necessary information.• Demonstrate honesty in your communications: Provide as much information as you can, and only promise what you can deliver. If you have information that cannot be shared because of confidentiality requirements, say so, but don't withhold information unnecessarily.
3. Recognize the balance of responsibility
<ul style="list-style-type: none">• All tenure holders have a responsibility to communicate: Although the 'new' tenure holder may be expected to take the first step, existing tenure holders are responsible for responding and playing an active role in communications.• Reasonable accommodation is a two-way street: While a new tenure holder is expected to try to accommodate the needs and interests of existing resource users, there is no specific right associated with being first, and therefore existing tenure holders are also expected to accommodate new activities.• Be mindful of the interests of the Province and its responsibilities to the public and First Nations: In order that arrangements made between tenure holders do not conflict with the First Nations and Province's objectives.

4. Understand the limitations of tenures

- Tenures are enabled and limited by provincial legislation: Therefore, it is advisable to be familiar with the *Land Act* and regulations under which the tenure is issued. A general understanding of the Acts and regulations for other tenures will also be helpful.
 - Develop a thorough understanding of your own tenure: Each license, lease, SRW, permit or other tenure legally conveys a specific set of rights, privileges or obligations. The tenure document 'fine print' is important, and holders cannot assume any rights not in the document. If you are in doubt, ask the issuing agency to explain the full scope and limitations of your tenure or contact your legal counsel.
 - Acquire a general understanding of other resource tenures: While it is not realistic to have a working knowledge of all tenure types, it is good business practice to know and understand the provisions of those types that most affect your business.
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5. Make clear and meaningful agreements

- Agreements between tenure holders can be made to suit the need: In all cases the agreements should be clear and entered freely and legally by all parties. The format, detail and formality can vary from a handshake to a lengthy legal document.
 - Agreements should anticipate future circumstances: While we cannot predict the future; it is likely that individuals or important circumstances will change during the term of an agreement. If an agreement is complex, it is best to have it written out, vetted, and recorded.
 - Consider how disagreements will be resolved: Although the purpose of the agreement is to resolve conflicts and prevent disputes, it is rarely possible to anticipate all circumstances. An agreement should include the process by which disagreements on interpretation or compliance will be addressed
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6. Make the agreement real during operations

- Get started on the right foot: Take extra care to communicate with other tenure holders and respect their interests as your project or activity gets underway.
 - Monitor and document activities: Pay particular attention to timelines and other commitments in the agreement. Keep a record of compliance, and quickly acknowledge and remedy problems.
 - Understand and live to the spirit of the agreement: It is unlikely that an agreement covers every detail and possible scenario, but living up to the spirit of the agreement, and checking regularly with other tenure holders can reduce disputes.
 - Communicate internally: Make sure that operational (on-site) staff know what is expected and can comply with the agreement.
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7. Realistically assess and adapt

- Demonstrate your commitment: Be prepared to carry out joint field inspections and reviews with other tenure holders to assess how effective each of you is being at accommodation.
 - Be prepared to make reasonable adjustments: Learn and adjust as activities proceed. Allow innovation to improve the coordination of activities with other tenure holders. Be careful to avoid arbitrary or unilateral changes to agreed-upon accommodation.
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Appendix C BW Gold Engagement Report (2016 – 2022)

BW Gold – Batnuni Engagement Report January 2016 to Date: Condition 38

Project = BW (Blackwater Project) owned by New Gold, prior to August, 2020. BW Gold (Blackwater Project Owner) a subsidiary of Artemis Gold Inc.as of August, 2020 referred to as BW Gold.

* All Reference includes J.Linnell (designated negotiator) L. Barsby (GTC Owner), K.Church (Barsby legal counsel), A.Ackerman, (Advisor), Troy Larden (FLNRO F&W Section Head), E.Frisch (QP)

Interaction Number	Date	TL	Project	Type of Interaction	Attendees/Correspondants	Subject Area	Summary of Issues and Concerns (Project-specific Interactions)	Additional Information Required	Proposed Mitigations Batnuni
172	2022-02-11		x	Email	E.Frisch to All	Appendix D Mitigation Measures Response	Distribute updated Appendix D Mitigation Measures Matrix and the reformatted Mitigation Matrix Response Table in the standard EAO format for reference. Response table was discussed at January, 2022 meeting and includes both FLNRORD and Batnuni comments.		
171	2022-02-11		x	Email	K.Church to C.Alderson, G.vanderWesthuizen	Meeting Proposal	Batnuni counsel offers to arrange a virtual or in-person meeting between Batnuni representatives and himself and representatives of Artemis, outside of EA process. Batnuni would provide materials and a proposal for consideration.		
170	2022-02-11		x	Email	E.Frisch to All	Condition 38 - Meeting	Inform EAO, FLNRORD, BW Gold that Batnuni has cancelled the meeting for Feb 14.		
169	2022-02-11		x	Email	A.Ackerman to E.Frisch	Condition 38 - Meeting	Batnuni seeks to cancel the February 14 meeting to allow for further preparation.		
168	2022-02-03		x	Email	E.Frisch to L.Barsby (All)	Meeting Agenda and Confirm AMWG Invitation	Responded to L.Barsby request for information. Sent maps and checked to ensure he had received invitation to Access Management Working Group recently as it had maps attached.	Confirm receipt of invitation to AMWG.	
167	2022-02-03		x	Email	L.Barsby to E.Frisch	Meeting Agenda	Information requested to be prepared by BW Gold for upcoming Feb 14 meeting.	Map with the proposed airport the proposed 1,000 & 2,000 manned camps. 2 proposed lakes pipeline & pump stations dams outer boundary of the strip mine the proposed No Shooting area boundaries	
166	2022-02-02		x	Meeting (Virtual)	All	Condition 38	Renewed that all communications would go to all Participants. Discussed how the response to Batnuni's Condition 38 comments will be prepared. Batnuni believes mitigations are unaffactive and QP is not representing Batnuni. Discussion of mitigation tools and compensation and how BW Gold can receive information to understand the full use of the territory and exhaust opportunities for mitigation. Batnuni does not wish to share information and believes the past use of the GTC is irrelevant. Information will only be shared if there is a possibility that financial compensation will be paid. BWG noted information is necessary to determine impact. Project mitigations are the path being pursued now. EAO stated that Condition 4 process is occurring. Concerning that Batnuni does not want to participate in mitigations. Discussion on what is considered a mitigation. EAO considers the Condition 38 mitigations as such. BWG clarified commitments with BWG project partners are founded on all parties being guests in their territory. Batnuni's tenure use and allegeded impact is not parallel. Agreed to exchange detailed project and tenure area use information between the Parties as a learning opportunity. Monday 14th set as next meeting as a check in and share information (1 hour).	All participants to send Ellen a list of information they wish to have included specifically at the 14th. BW Gold to respond to offer for field trip. EF arrange to send project drawings. LB to send a note to EF on specific items. BWG will send list of information needed from Batnuni. Batnuni seeking: feasibility study (clarify expansion if needed), Key objections to be sought. BWG to consider a meeting in person in Kamloops.	Compensation
165	2022-02-02		x	Email	A.Ackerman (Batnuni) to E.Frisch (QP), (All)	Condition 38 Response	Complaint distribution of Condition 38 Plan (main body) did not include Batnuni advisors.		
164	2022-02-02		x	Email	E.Frisch (QP) to All	Condition 38 Response	Distribute response to Batnuni Comments on Condition 38 (Body) of the plan.		
163	2022-01-21		x	Meeting (Virtual)	All	Condition 38	Meeting objectives; Understand Batnuni's comments and how they wil be addressed; in what format, next steps. Agreed all emails/documents will go to all Parties. Batnuni believes impacts cannot be adequately mitigated, due to the effect of a mine on wilderness experience hunts. Batnuni can not operate a wilderness experience business. Questioned 'order' of mine approval. EAO stated the mine has been approved by government through the EA Certificate, subject to completing the Conditions. FLNRORD mitigations bound in other Management Plans are a risk to government if not published. EAC Plans are available through link on BW Gold website. BW Gold moving to implementing Management Plans, for example and need to collect information from Batnuni (Emergency Response planning).	Emergency response planning for Batnuni in the field.	Compensation
162	2022-01-21		x	Email	E.Frisch (QP) to T.Larden (FLNRO), (All)	Condition 38 Document Comments	Clarifying comments came from EAO to BW Gold on January 13. Not clear what was discussed on distribution and will leave it between Batnuni and EAO to confirm.		
161	2022-01-21		x	Email	T. Larden) to E.Frisch (QP), Batnuni	Condition 38 Document Comments	FLNRORD requesting Batnuni's Condition 38 comments		
160	2022-01-20		x	Email	E.Frisch to All	Condition 38 Document Comments	Meeting reminder and suggestion it would be helpful to walk through Batnuni's comments in the context of BW Gold's previous information to advance the conversation.		
159	2022-01-14		x	Email	E.Frisch to T.James, BW Gold, J. Linnell	Condition 38 Response	EF acknowledge receipt and will give though to what a table of response would look like to support the review on the 21st.		
158	2021-01-13		x	Email	T.Janes (EAO) to BW Gold, J. Linnell	Condition 38 Response	EAO distribute to BW Gold, Batnuni response to Condition 38.		

BW Gold – Batnuni Engagement Report January 2016 to Date: Condition 38

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Interaction Number	Date	TL	Project	Type of Interaction	Attendees/Correspondants	Subject Area	Summary of Issues and Concerns (Project-specific Interactions)	Additional Information Required	Proposed Mitigations Batnuni
157	2021-12-22		x	Meeting (Virtual)	All	Condition 38	Meeting objective: Determine next steps and accept any verbal feedback from Batnuni. Batnuni felt plan filing December 1 was inappropriate. The mitigations do not address the impacts, and the tenures remain incompatible. Compensation is the only option. No consideration for change of business model. Compensation could be a parallel process. BW Gold is seeking information requested from Batnuni which has not been received yet. Discussion on the format of the Condition 38 response and mitigation measures response table. Going forward responses will be managed in a separate table. Compensation and whether it is part of Condition 38, parallel or outside the process was discussed. EAO explained its window of 60 days to review and request changes. Batnuni will provide comments to Condition 38 by Jan 10. Followup meeting dates of January 21 and February 1 were established..	Understand role and mandate of AMWG Batnuni comments on Condition 38	Compensation
156	2021-12-21			Email	E.Frisch (QP) to All		Request is not being ignored. It seems there is a misunderstanding of the process, which is summarized below: 1. We were meeting on the 22nd to review all of the documents, discuss the content and rationale and updates would be made to the documents (at the Matrix) following receipt of Batnuni's comments 2. Batuni has told the EAO that written comments would be provided by January 10. 3. I will prepare an updated V2 of the Condition Report and Mitigation Matrix following receipt of all comments. This will be re-distributed for discussion the week of January 17. Does that accord with your understanding? If your team is able to provide available dates in January and February that is also helpful to continue planning.	Batnuni to confirm the approach accords with their understanding.	
155	2021-12-21			Email	J.Linnell to E.Frisch(QP) All	Condition 38	See email from December 12. Compensation to be updated in the matrix. QP ignored request.		
154	2021-12-21			Email	E.Frisch to All		Agenda was proposed in early December and updated the following week when FLNRORD responded. Batnuni was invited to comment on the agenda and I invite you to do so in advance of the meeting.	Batnuni invited to comment on the meeting agenda.	
153	2021-12-21			Email	J.Linnell to E.Frisch(QP) All	Condition 38	(Based on December 22nd meeting agenda, QP should be recused. The agenda should be mutual by all parties. Compensation was removed from the matrix plan.		
152	2021-12-20			Email	E.Frisch (QP) to All	Meeting Agenda	Agenda for December 22nd meeting, previously circulated on the 8th. Condition 38 being updated based on FLNRORD's comments. Imptant opprotunit to want through the structure and rationale of the Condition 38 report. Propose dates in January and February for availability.	Dates to meet in January and February.	
151	2021-12-15			Email	E.Frisch to All	Condition 38 and Condition 4	Response to keep version control in PDF to provide hand written, digital in PDF editor, or track in table (sample attached). Process of consultation is defined under EAC Condition 4. A sample response table and Condition 4 were inserted.	Response in a table format.	
150	2021-12-15			Email	K.Church to E.Frisch/C.Alderson (J.Linnell)	Condition 38 - Admin	QP has provided word documents in the past, why refusing?	Condition 38 in word	
149	2021-12-14			Email	E.Frisch to All	Condition 38 - Admin	Request can not be met, in order to retain version control. Please provide comments in an information request style table siting the page, paragraph and clarification sought. This will create a central record for all Parties.		
148	2021-12-14			Email	K.Church to E.Frisch/C.Alderson (J.Linnell)	Condition 38 - Admin	Receive Condition 38 in Word Document,	Condition 38 in word	
147	2021-12-12		x	Email	Batnuni (J.Linnell) to E.Frisch (QP) All + EAO+ GOABC	Condition 38	Angry the Condition 38 plan was filed on December 1st since BW Gold has been setting the agenda starting in September. Tenures are incompatible and BW Gold waters down the impacts. The draft plan minimizes BW Golds impacts on Batnuni's business. Unhappy with role of QP. Compensation left out of matrix table.		
146	2021-12-10		x	Email	E.Frisch (QP) to All	Condition 38	Planning followup meeting December 22nd with agenda. Purpose to review the submitted Condition 38 and provide a verbal explanation regarding the layout, structure and the specific responses to Batnuni and FLNRORD comments. The objective was to enable Batnuni and FLNRORD to have a deeper understanding prior to providing written responses. The principle is to create transparency and the reduce volume of written materials through more direct dialogue. Reiteration of QP Authority to...no obligation to engage in financial compensation but to identify a range of mitigations which include compensation, set the stage for dialogue, interpret data for the parties. Acknowledge receipt of FLNRORDs comments.		
145	2021-12-08		x	Email	J.Linnell (Batnuni) to All	Condition 38	Response to request to QPs request to meet soon and call on December 6. Making it clear Batnuni will not meet until after meeting with EAO. Team available on the 22nd and requesting EF to be recused.		
144	2021-12-08			Email	T. Larden) to E.Frisch (QP), Batnuni	Condition 38	Shared meeting availability		
143	2021-12-08		x	Email	E.Frisch (QP) to Batnuni (All)	Condition 38	Email following up to schedule meeting to review Condiioin 38 draft and Mitigation Matrix, inclusion of proposed agenda.	Dates Batnuni is available to meet and agenda input.	
142	2021-12-08		x	Email	T. Larden) to E.Frisch (QP), Batnuni	Condition 38	Provided comments on Condition 38 Plan. EF acknowledged receipt with email.		

BW Gold – Batnuni Engagement Report January 2016 to Date: Condition 38

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* All Reference includes J.Linnell (designated negotiator) L. Barsby (GTC Owner), K.Church (Barsby legal counsel), A.Ackerman, (Advisor), Troy Larden (FLNRO F&W Section Head), E.Frisch (QP)

Interaction Number	Date	TL	Project	Type of Interaction	Attendees/Correspondants	Subject Area	Summary of Issues and Concerns (Project-specific Interactions)	Additional Information Required	Proposed Mitigations Batnuni
141	2021-12-06		x	Telephone Call	E.Frisch (QP) to J.Linnell (Batnuni)	Condition 38	Left VM, calling to followup to set up a meeting date following J.Linnell team consultation on 12/2.		
140	2021-12-03				A.Ackerman (Batnuni) to E.Frisch (QP), (All)	Condition 38 - Admin	Request to reformat to print Condition 38 Appendices. EF responded to address technical issue and resent.		
139	2021-12-03			Email	A.Ackerman (Batnuni) to C.Alderson All	Information Request from BW Gold	Request to resend Schedule A due to ledgibility issue. Provided and repeated again on 12/4		
138	2021-12-03			Email	A.Ackerman (Batnuni) to E.Frisch (QP), (All)	Information Request from BW Gold	Responding to E.Frisch email 11/30; Complaint about characterization of the value of in person meetings.		
137	2021-12-02		x	Telephone Call	E.Frisch (QP) to J.Linnell (Batnuni)	Condition 38 Approach	Call to followup on the email exchange and to schedule a meeting and review the Condition 38. QP seeks to walk through and discuss all elements of the document to ensure a solid understanding. QP wil not be recusing herself. Discussed Batnuni has little business operations data since it wasn't tracked, unable to differentiate bewteen GTCs. Didnt track species or hunts booked or locations. GTC territory had been previously unused prior to acquiring. Will be meeting with EAO and involving GOABC. Will discuss meeting date with the team.	Dates Batnuni team is available to meet.	
136	12-02-2021			Email	E.Frisch to T.Larden	Condition 38	Apologizing for missing distribution.		
135	2021-12-02			Email	T.Larden to E.Frisch	Condition 38	Troy was missed on initial submission distribution to EAO and enquiring as to why. Committed to reviewing and providing comments of the Plan to the EAO and involved Parties.		
134	2021-12-02		x	Email	T.Janes (EAO) to All	Condition 38	EAO happy to set up a meeting to hear Batnuni perspective. Next steps for EAO review of draft plan outlined in EAC Condition 1. EAO has 60 days to approve the plan or request revisions. Plan will be reviewed against the requirements of Condition 38 and the requirement to consult.	Batnuni to provide times to meet with EAO	
133	2021-12-02		x	Email	J.Linnell to All + EAO	Condition 38	Confused by submission of report to EAO. Consultation has not been meaningful. Is not consensus Requesting a cease and desist on the matter will be seeking legal advise. EAO advise Batnuni of decision.	EAO to advuse on the decision of the submission.	
132	2021-12-01		x	Email	E.Frisch (QP) to All	Condition 38	Distribution of full Condition 38 Tenure Holder Communicaitons and Mitigation plan for review. Mitigations Table and Communications (Engagement Report) all documents previously discussed. Communications report was updated following receipt of Batnuni's comments to incorporate engagement between Batnuni and New Gold in 2016. Look forward to setting a date to review (further to email sent earlier in the day)		
131	2021-12-01		x	Email	K.Church to All	Mitigation Matrix Comments	What is meant by asking if Batnuni wishes to participate in a communication process? Is QP attempting to demonstrate Batnuni has not been an active player, as they have been. Batnuni's concerns have been negated. Batnuni reconfirms its commitment to participate in the process of identifying issues and working toward resolution of the issues regarding BW Gold's Condition 38. BW Gold is not prepared to engage in a meaningful way. E.Frisch should recuse herself.		
130	2021-12-01		x	Email	T. Larden) to E.Frisch (QP), Batnuni	Condition 38	Add to the agenda the process for review and approval of Condition 38.		
129	2021-12-01		x	Email	E.Frisch (QP) to All	Condition 38	Distribute updated Condition 38 Mitigation Matrix which will be attached as a schedule to the Tenure Holder Communication and Management Plan. There are a number of Tenure Holder specific mitigations which BW Gold is unclear if Batnuni wishes to particiate. Concluding the communication process understanding is important, since some of the offerings will begin active planning in January. Propose a meeting for 1.5 - 2 hours to review Condition 38 before Dec. 10.. a. updated Mitigation Matrix responses b. Review of the draft Condition 38 Report c. Batnuni Information Requests and Responses - Project schedule - Process of developing management plans etc. d. BW Gold Information Requests and Responses	Batnuni and FLNRO to advise on availability to meet; 2-3 dates before December 10. Advise on agenda content. Batnuni to advise on interest in participating a communication process.	
128	2021-12-01		x	Email	E.Frisch (QP) to All	Information Request from BW Gold	Acknowledge receipt of information provided on November 29 to C.Alderson. Noting the FBC Decision, 2009-2015 harvest chart were already on file. There are still information gaps that would be helpful to discuss. reiterated the parties had discussed meeting face to face at the November 10 meeting, and mutually agreed to meet in person when there were common objectives for the meeting, given current restrictions and travel reqirements. Snr VP Candice Alderson has decision making authority and has attended/will attend meetings. Virtual meetings are not hindering dialogue. Condition 38 Mitigation Measures table will be sent under a separate cover with a proposal for a virtual meeting to disuss the Condition 38 documents, the Project and information Batnuni circulated.		

BW Gold – Batnuni Engagement Report January 2016 to Date: Condition 38

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Interaction Number	Date	TL	Project	Type of Interaction	Attendees/Correspondants	Subject Area	Summary of Issues and Concerns (Project-specific Interactions)	Additional Information Required	Proposed Mitigations Batnuni
127	2021-11-30		X	Email	E.Frisch (QP) to T.Larden (FLNRO), J.Linnell, L.Barsby, A.Ackerman (Batnuni)	FLNRORD Mitigation Comments	Distribution of a detailed map of all FLNRO overlapping leases, licenses and tenures in the Davidson (GTC 601039) and tables listing Mineral, Placer and Coal Claims: Claim n Traplines Forest Tenure Managed Licenses Forest Tenure Cutblocks – The block status date, description and area and owner) Forest Tenure Road Segment lines (Road ID, length, type of permit, who owns it, and when it was closed) Digital Road Atlas (Road type, classification, length, location).		
126	2021-11-30		X	Email	E.Frisch (QP) to T.Larden (FLNRO), J.Linnell, L.Barsby, A.Ackerman (Batnuni)	FLNRORD Mitigation Comments	Distribute table of Mitigation Matrix response to FLNRO's comments on Mitigation Matrix. Comments were received separately and will be distributed separately. A response to Batnuni will also be forthcoming. BW Gold confirmed (through comments) that there is a process for FLNRORD Engagement on the EAC specific mitigaions previously shared (e.g. Wildlife Management Plan - Moose, Grizzly Bear) and there are "three differet touch points" with FLNRORD on different project elements.		
125	2021-11-29		x	Email	J.Linnell (Batnuni) to C.Alderson (All)	Information Request from BW Gold	Conveyed response to letter and Schedule A of information Batnuni has in turn requested information from Artemis in writing. Artemis has still not committed to a face to face meeting with an employee with decision making authority, which Batnuni's legal counsel had asked for. Provided initial information responses: GTC 601039, Batnuni Sale listing, IRC Davidson Decision, GTC L.Barsby/Linnell, Answers. Artemis has still not committed to a face to face meeting with an employee from Artemis with Decision making authority	Face to face meeting scheduling	
124	2021-11-23		x	Email	J.Linnell (Batnuni) to E.Frisch (QP)	Information Request from BW Gold	Receipt of Information Request.		Compensation
123	2021-11-22		x	Written Letter	C.Alderson (BW Gold) to All	Information Request from BW Gold	List of information requested from Batnuni (Action item from November 10 meeting) and November 17 email which would demonstrate how GTC #601039 has been operated since inception. Data has been requested for the third time as information previous provided from Batnuni, while Batnuni insists it is 'fulsome' was verbal or not substantiated by BC Government filings. quota received, actual hunts offered, costs associated with the hunts and the level of business actually undertaken in GTC #601039.	Detailed information Request to Batnuni which reflects information not received in information to date.	
122	2021-11-17		x	Email	K.Church (Batnuni) to All	Condition 38 Document Comments	Responses and comments on the following documents provided:: a 2012 Call Log a Condition 38 Mitigation Matrix Table, a Summary of Issues and Concerns. There are several areas where BW Gold has requested information from Batnuni which has not been provided. Batnuni requests an exhaustive list of what BW Gold has requested and what has not been produced. Batnuni will make efforts to produce or provide objections and reasons for declining.	From BW Gold an exhaustive list of what BW Gold has requested and what has not been produced. And 1. The details of any mitigation/compensation offered to other tenure holders in the area affected by the mine and its exploration and development; 2. The history of and details of BW Gold and its subsidiaries mitigation efforts with other projects in British Columbia and other Canadian Provinces; 3. Documents from BW Gold regarding the proposed lifetime of the mine including reclamation; 4. Documents from BW Gold specifically outlining the proposed number of employees/contractors/persons on site for the various stages of the project and the time lines associated with those stages; 5. Documents from BW Gold specifically outlining the proposed number and type of equipment/machinery/ aircraft on site at the various stages of project from exploration to reclamation; 6. A proposed blasting schedule or construction and production; and 7. Specific responses to whether BW Gold will be willing to curtail operations, and if so the extent of that curtailment, during Batnuni's primary Spring (April 1 – June 30) and Autumn (Sept 1 – Nov 15) hunting windows.	BW Gold curtail operations, and if so the extent of that curtailment, during Batnuni's primary Spring (April 1 – June 30) and Autumn (Sept 1 –Nov 15) hunting windows.
121	2021-11-17		x	Email	E.Frisch (QP) to All	Condition 38 Document Comments	Followup on November 10 meeting discussed Batnuni providing written comments on Sept 10 documents by November 12. Information did not arrive. Enquiring on status given flooding chaos.	Confirm if comments on September 10 documents would be coming that week.	

BW Gold – Batnuni Engagement Report January 2016 to Date: Condition 38

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* All Reference includes J.Linnell (designated negotiator) L. Barsby (GTC Owner), K.Church (Barsby legal counsel), A.Ackerman, (Advisor), Troy Larden (FLNRO F&W Section Head), E.Frisch (QP)

Interaction Number	Date	TL	Project	Type of Interaction	Attendees/Correspondants	Subject Area	Summary of Issues and Concerns (Project-specific Interactions)	Additional Information Required	Proposed Mitigations Batnuni
120	2021-11-10		x	Email	E.Frisch (QP) to All	Condition 38 Approach	<p>Batnuni comments on the Conditions Matrix, Summary of Issues/Concerns and Communication log, as early as Friday (Nov 12 or early next week).</p> <p>There is a shared objective of establishing a common list of business information available for the Batnuni Lakes Guides and Outfitters business. The list will be composed of the type of information below and will be initiated by Artemis for Batnuni's review and comment.</p> <p>Information previous provied to New Gold may. need to be reshared by Batnuni.</p> <p>Batnuni will provide acompensation proposal to Artemis if desired.</p> <p>The objectives of the proposed face to face meeting for Nov 18 or 19 were not aligned. Steps 1, 2 and 3 need to be addressed to ensure a productive face to face session in the future. That is likely to be after the week of Nov 22.</p> <p>An iterative drafting process is proposed to continue;</p> <p>1. Further conversations on some of the mitigations (e.g alternative access/staging, communication protocol) in order to plan the details within them, once receiving Batnuni's feedback;</p> <p>2. Batnuni is open to a call to review their forthcoming comments on the Condition 38 documents, but is not requesting one.</p> <p>3. BW Gold will share an updated version of the documents and the Condition Plan or further discussion.</p> <p>4. BW Gold will be providing a response to Troy Larden's comments on the Mitigation Matrix and is preparing an analysis of the GO ABC table previously shared.t ready for the proposed.</p> <p>5. In person meeting to be rescheduled at a future date following further actions and shared objectives.</p>	<p>Circulate actions from the meeting.</p> <p>Batnuni to provide Comments on the Condition 38 Documents</p> <p>Batununi business information required.</p> <p>Artemis to prepare a list of information still required</p> <p>Batnuni to confirm if a meeting is sought to review their comments.</p> <p>BW Gold response to FLNRO MM Comments</p> <p>BW Gold response to GOABC Table</p>	
119	2021-11-10		x	Meeting (Virtual)	BW Gold (C.Alderson), E.Frisch (QP), (Batnuni) J. Linnell, K. Church, T. Larden (FLNRORD)	Condition 38 Approach	See actions circulated above.	See Above	
118	2021-11-09		x	Email	K. Church (Batnuni) to E.Frisch (QP)	September 10 Condition 38 Documents in Word Format	Process of response confirmed.		
117	2021-11-09		x	Email	E.Frisch (QP) to K.Church (Batnuni)	September 10 Condition 38 Documents in Word Format	Word documents provided for Issues and Concerns and Mitigation Matrix, advise the Communications Matrix is Excel and please make comments in PDF.		
116	2021-11-09		X	Telephone Call	E.Frisch to J.Linnell (Batnuni)	Condition 38 Approach	<p>QP called J.Linnell following circulation of six conflicting emails from four Batnuni Team (not all recorded here) and FLNRO which eliminated possible dates to have a meeting until December. Batnuni has previously stated all the advisors and FLNRO must be available for all meetings and this does not work logistically. The outcomes of the call were:</p> <p>1. Ellen to set up the all on Wednesday Nov 10 at 11:00am with as many team membrs who are available as a 'check in' (complete)</p> <p>2. Jim to provide a list of goals/expectations for the proposed face to face meeting (tomorrow's call) or by call this afternoon.</p> <p>3. Ellen to research internally with Artemis any historical information and JL will do same with Kevin Church.</p> <p>4. Agreed that goals, objective and expectations for Nov 18 / 19 is important and necessary before agreeing to a date. (To discuss the next day)</p>		
115	2021-11-09		x	Email	K. Church (Batnuni) to E.Frisch (QP)	September 10 Condition 38 Documents in Word Format	Please provide documents in Word format for commenting.	September 10 Condition 38 Documents in Word Format	
114	2021-11-07		x	Email	J.Linnell (Batnuni) to All	Establishing availability, to discuss the schedule and process for reviewing the Condition 38 Materials.	<p>I can be available with a few days notice. As for your request to meet again on Friday the 12th, I'm out. I should also note that Batnuni requires all their representatives and Troy Larden to be on all calls and face to face meetings going forward. The excuse of using the most number of participants to go forward with a meeting, would not be considered a High Level Consultation process..</p> <p>Batnuni's Legal counsel has made it clear that this process needs to be extended to give proper meaningful consultation to occur as Atermis's proposed schedule was conveniently developed with out input from Batnuni. Batnuni has experienced this type of behaviour since 2012 from New Gold and now Artemis. To propose the scheduled in the middle of Batnuni's busiest times is another glaring example of Artemis only interest, is in fulfilling their own business agenda.</p> <p>We are requesting a Face to Face meeting in Kamloops or Williams Lake to discuss Condition 38 and comments from both side's to keep the Spirt of a High Level of Consultation intact. Dates to be discussed while establishing the schedule going forward.</p> <p>Also thank you for the reply with regard to the request of Factual Documentation, Batnuni does not fully agree with the response but will offer their own version as some facts have been intentionally left out.</p>	<p>Face to face meeting in Kamloops or Williams Lake and dates to be discussed while establishing the schedule going forward.</p>	
113	2021-11-05		x	Email	A.Ackerman to E.Frisch, K.Church, J.Linnell, T.Larden (FLNRO)	Availability	Not available Nov 10 or 12. Not available until Dec 7 in person. If in Kamloops will take most of the day to get there.		

BW Gold – Batnuni Engagement Report January 2016 to Date: Condition 38

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Interaction Number	Date	TL	Project	Type of Interaction	Attendees/Correspondants	Subject Area	Summary of Issues and Concerns (Project-specific Interactions)	Additional Information Required	Proposed Mitigations Batnuni
112	2021-11-05		x	Email	E.Frisch to All	Establishing availability, to discuss the schedule and process for reviewing the Condition 38 Materials.	Given the 11 th is holiday, I recommend examining availability on the 10 th (Wed) and Friday the 12 th . Blackwater is reviewing internally if the Batnuni Team can likewise confirm availability on Monday morning, that would be great. Our next meeting could be 1 – 2 hours based on the level of detail everyone is prepared. Agenda: 1. Establish a schedule going forward. 2. Discuss the Condition 38 documents (Sent Sept 10) and receive verbal comments from Batnuni prior to written comments. 3. Approach to exploring mitigations.	Meeting availability to confirm November 10 or 12th for call.	
111	2021-11-05		x	Email	E.Frisch to J.Linnell	Delegation of Lyle.Barsby GTC negotiation to J.Linnell. Ownership of GTC #601039.	Limited information available online indicates that the GTC is issued in the personal name of Lyle L.Barsby, not the corporation of Batnuni Lake Guide & Outfitters Ltd. Lyle's role as Director of Batnuni Lake Guide and Outfitters LTD enables the GTC be considered an asset of the company operation, which may be what you are referring to? Receiving a copy of this certificate or the issuance page would clarify that information.	Batnuni to provide a copy of the GTC Certificate #601039 for clarification.	
110	2021-11-05		x	Email	J.Linnell (Batnuni) to E.Frisch (QP)	Delegation of Lyle Barsby GTC negotiation to J.Linnell. Ownership of GTC #601039.	Thank you for your response with Lyle's letter as requesting a signature and witness name and signature. I appreciate your concern with the Certificate being in Lyle's name but Batnuni Lake Guide & Outfitters LTD own's the Certificate. As their are many layers in this it is clear Artemis is unaware of this also which is not surprising.		
109	2021-11-05		x	Email	E.Frisch to L.Barsby, J.Linnell	Delegation of Lyle Barsby GTC negotiation to J.Linnell. Ownership of GTC #601039.	Request from QP to sign, date and witness the email statement delegating negotiation responsibility on his behalf to J. Linnell.	Signed and witnessed email confirming designation of J.Linnell to negotiate on behalf of L. Barsby for named GTC Certificate.	
108	2021-11-05		x	Email	E.Frisch (QP) to All	Response to questions on draft Issues and Concerns; Past sale history of Batnuni, meeting dates.	Letter responding to request (October 27, 2021) seeking factual response on preface statements within the draft Issues and Concerns. Included four appendices including the Vanderhoof LRMP Access Management Plan, J.Linnell's moose allocation appeals for GTC #500948 for 2009, 2013 and 2019. Sought to confirm a date the week of November 8 for a followup planning call (discussed on the October 28 call between Batnuni and Blackwater.	Confirm if a call the week of November 8th can be scheduled as discussed October 27.	
107	2021-11-05		x	Email	L.Barsby to E.Frisch, J.Linnell	Delegation of Lyle Barsby GTC negotiation to J.Linnell. Ownership of GTC #601039.	This is to authorize J.Linnell to act on my behalf for all negotiations dealing with BW Gold (Artemis) and my Guide Area 601039. (Provided Address and phone number in Invermere, BC)		
106	2021-11-01		x	Email	E.Frisch (QP) to T.Larden (FLNRO), J.Linnell, L.Barsby, A.Ackerman (Batnuni)	Mitigation Matrix Comments	It looks like a few of the questions may revolve around items that were discussed through the EA working group (e.g.Project Mitigation measures - specifically, the Bear and Moose mitigations). Have you been involved in the project review? We will work on getting those questions answered.	TL to confirm role in Project Review. BW Gold to prepare response to Mitigation Matrix comments.	
105	2021-11-01		x	Email	T.Larden (FLNRO) to E.Frisch (QP), A.Ackerman, J.Linnell,L. Barsby (Batnuni)	Mitigation Matrix Comments	Comments incorporated into the September 10, 2021 Blackwater Mitigation Matrix.	BW to prepare response. Batnuni asked to reach out to FLNRO with any comments or questions on the comments.	
104	2021-10-28		x	Meeting (Virtual)	E.Frisch to K.Church, T. Larden, J.Linnell, L. Barsby, K.Poettcker, C.Alderson, T.Desmoreaux	Zoom meeting; Introductions and provide overview of Condition 38 Draft Documents discuss Schedule and Next Steps	Batnuni and its advisors had not reviewed the documents distributed September 10 and had not engaged between themselves given the guiding season and K.Church's holidays between September and October. Consultation has not been meaningful and more time is required in the schedule, which was compressed to continue to target the completion date of December 1st.	Batnuni to provide written comments on the draft documents the week of November 8. Batnuni will provide availability for meetings with the idea of having a followup call the week of November 8 to answer any questions or review Batnuni's comments. An updated schedule to be explored once availability is provided, with an expectation of discussion of the 'go forward' approach the week of Nov 8. BW will review the GOABC Mitigation Matrix.	
103	2021-10-28		x	Email	E.Frisch (QP) to All	GO ABC Matrix Table	Confirm receipt of Guide Outfitting Association of BC Mitigation Matrix		
102	2021-10-28		x	Email	J.Linnell (Batnuni) to All	GO ABC Matrix Table	Reforward to Guide Outfitting Association of BC Mitigation Matrix.		
101	2021-10-27		x	Email	E.Frisch (QP) to All	Condition 38 Document Comments	Distributed the Condition 38 Mitigation Matrix, previously distributed on September 10 and October 5 and the language associated with Condition 38.		

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Interaction Number	Date	TL	Project	Type of Interaction	Attendees/Correspondants	Subject Area	Summary of Issues and Concerns (Project-specific Interactions)	Additional Information Required	Proposed Mitigations Batnuni
100	2021-10-27		x	Email	J.Linnell (Batnuni) to All	Response to Batnuni Sale history and Questions on Draft Concerns and Issues Summary	<p>You are correct that I mentioned Batnuni had been up for sale for \$1.3m. I assume the (204) listing you seen was provided by Artemis?</p> <p>I'm not familiar with the (2014) document you attached as it looks like it was printed off the internet at some time. I noticed a few issue's with it and at this time will dig into it before sharing more information so I'm not misquoted.</p> <p>Request for information.</p>	<p>As with keeping the spirt of sharing background documents and information, could you please provide us with Factual Documentation from Artemis with the items below that was in the Summary of Issue's and Concerns, specifically these items below.Batnuni business operations have likely been further impacted by the other big picture regulatory and international economic influences</p> <p>1. Global recession starting in 2007- 2010 and other economic impediments (ie: currency risk as hunts are priced in USD) 2. Vanderhoof Land and Resource Management Plan, Access Management Plan allowing motorized vehicles access to the backcountry region; (2008) 3. Provincial change in moose allocation to Batnuni; (2014 onward) 4. Environmental impacts on animal populations (pine beetle, forest fires)</p>	
99	2021-10-26		x	Email	E.Frisch (QP) to J.Linnell (Batnuni)	Sharing Background Information following Phone Call 10/23	<p>J.Linnell noted Batnuni had been for sale for \$1.3m. E.Frisch had seen a listing in 2014 for \$749,000.</p> <p>E.Frisch sent the 2014 Real estate listing from October, 2014 with a request to share the \$1.3m listing. Also to clarify what both listings were meant to include; both guide certificate areas or one? The business or only the fee simple land? What area of crown land lease area (land volume, infrastructure and in which certificate area) etc?</p>	<p>Clarification of the October 2014 land/business sale posting provided by pdf and the \$1.3m listing referenced.</p>	
98	2021-10-25		x	Email	J.Linnell (Batnuni) to E.Frisch (QP)	Sharing Background Information following Phone Call 10/23	<p>J.Linnell sent Batnuni's March, 2021 response to the Transmission Line (Condition 39) routing proposal responding to BW Gold's February 26, 2021 routing consultation letter. "From Batnuni's standpoint, none of the proposed options address Batnuni's concerns with the dimishment and diminution of its wilderness experience package for its clients in the area. Any of the transmission line options have significant visual and wildlife effects."</p>		No mitigation proposed for Transmission Line.
97	2021-10-25		x	Email	E.Frisch (QP) to All Batnuni, FLNRO, BW Gold	Condition 38 Planning, Document Review and Introductions	<p>Distribute meeting agenda. Purpose is to cover the ground from September to-date and discuss next steps; Clarify attendance and purpose of BW Gold staff and advisors including Environmental Manager who is able to engage in greater detail related to the mitigations and environmental review details. QP is seeking to mitigate the natural information shortfall that comes with a new person (myself) and ensure conversations are productive. Proposed Agenda attached.</p> <p>1.Introductions 2. Review the documents sent on September 3 and 10 and the October 5 schedule. 3. Discuss the status of key elements of the project (e.g. Transmission Line) 4. Confirm any information required by the parties to support further discussions 5. Define the Agenda and timing for next Condition 38meetings</p> <p>Seek to ensure that L.Barsby is involved in dialogue since the GTC is in his name.</p>	<p>1. Lyle Barsby to confirm availability and if he has any connectivity issues with an online platform what we could accommodate. 2. Sharing any preferred email and a telephone number for your files.</p>	
96	2021-10-25		x	Email	J.Linnell (Batnuni) to All	Condition 38 Planning, Document Review and Introductions	<p>Thought the meeting was about overview of documents, suggested BW Gold advisor not attend.</p>		
95	2021-10-25		x	Telephone Call	E.Frisch (QP) to J.Linnell (Batnuni)	Introductions and Background	<p>General introductions and history of engagement with New Gold. Discussion of concerns. E.Frisch reviewed the file and did not see a response with proposed mitigation from Batnuni related to the Transmission Line routing. Following points were discussed: a) Guide Certificates are owned by the Company; b) Business was for sale for \$1.3m, c) Significant lost earnings d) Consultation has not occurred, e) Can't maximize development opportunity. f) tenures are incompatible g) compensation for loss of use h) gates on the Davidson and no key impacts use, i) no shooting zones are a concern j) cumulative effects impacts</p>	<p>a. GTC names are held by Barsby and Linnell. Provide evidence GTC's are 'held' by Batnuni Company, other than through Corporate ownership. b. Past sales listings online were different figures. EF to provide. c./ g Lost earnings needs to be calculated on more than revenue potential. Additional financial information needed. h. Need to understand Batnuni's specific uses and reference points in the Davidson.</p>	
94	2021-10-25		x	Email	E.Frisch (QP) to All Batnuni, FLNRO, BW Gold	October 25, Condition 38 Meeting Agenda	<p>Distributed email and meeting notice for October 28 12:30 - 2:30pm with draft agenda and confirming the time worked for the most number of people. (A.Ackerman declined due to availability)</p>	<p>Input on draft meeting agenda.</p>	
93	2021-10-25			Email	E.Frisch (QP) to All Batnuni, FLNRO, BW Gold	Scheduling/Availability	<p>With the narrowing of times and availability by Batnuni and Advisors, QP has attempted to find a date and time available for most participants, which is the afternoon of the 28th. The session is designed to meet, review of materials and begin navigating a path forward. If you're able to share your availability for followup meetings, that would be helpful as well for advance planning.</p>	<p>Batnuni provide availability and dates for followup meetings.</p>	
92	2021-10-21			Email	T.Larden (FLNRO) to All	Availability	<p>T.Larden available on 27th and only after 11 on 28th.</p>		

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Interaction Number	Date	TL	Project	Type of Interaction	Attendees/Correspondants	Subject Area	Summary of Issues and Concerns (Project-specific Interactions)	Additional Information Required	Proposed Mitigations Batnuni
91	2021-10-21			Email	A.Ackerman to E.Frisch, K.Church, J.Linnell, T.Larden (FLNRO)	Availability	A.Ackerman not available on 28th, only after 2pm on 27th.		
90	2021-10-21		x	Email	J.Linnell to All	Availability	J.Linnell available 27 and 28th, not 29th and wants Advisors and FLNRO to partake in the call.		
89	2021-10-05		x	Email	E.Frisch (QP) to All Batnuni, FLNRO, BW Gold	Proposed Updated Condition 38 Approach and Schedule.	Proposed approach taking into account Batnuni's return in late October. Proposed a call October 27, 28, 29 to provide overview of September 10 document and a call with BW Gold leadership the week following. QP open to feedback in the interim.	Feedback on the schedule, confirmation of availability for a call October 27, 28, 29, any questions in the interim.	
88	2021-10-04			Email	K.Church to E.Frisch	Out of Office	Out of Office until Friday, October 29, 2021		
87	2021-10-04		x	Email	E.Frisch (QP) to All Batnuni, FLNRO, BW Gold	FLNRORD Information Request	In EngagmentAcknowledged gaps in information going forward. It would be helpful to discuss this information further. An updated amended schedule and Approach wil be provided to the Parties.	Information on how GTCs and GO Licenses are managed, interpretation of existing harvest data, and data available for 6-1 and Approach to continuing Condition 38	
86	2021-10-04		x	Email	K.Church (Batnuni) to T.Larden (FLNRO), E.Frisch (QP), K. Poettker (BW Gold)	FLNRORD Information Request	Some of the specific questions may be able to be answered by Mr. Linnell and Mr. Barsby when they have concluded their guiding season and are able to reply. As I noted with the parties posing the questions, Mr. Linnell and Mr. Barsby will not be in a position to respond until early November. It would have seemed appropriate to include Mr. Linnell in the email chain in any event and we also commend you for including us in this line of inquiry.	Harvest quotas and actual hunting activity performed by Batnuni in 6-01 from 2005 to Date.	Batnuni may be able to provide more information associated with the enquiry.
85	2021-10-04		x	Email	T.Larden (FLNRO)to E.Frisch (QP), K.Poettker (BW Gold), J.Linnell, K.Church (Batnuni)	FLNRORD Information Request	Clarifications and answers were provided to management of GO Licenses and function of GTC: 1. GOs are provided an annual quota. A 5 year allocation is provided to the GTC holder. 2. As a condition of the GO license, Guides must report, through a guide declaration, every guided hunt regardless of harvest success. 3. GOs have a license with conditions. Non compliance with the conditions can result in an administrative hearing which could result in the license being cancelled. Actual harvest information by GO can be summarised and can be accessed though a FOI Answers to Q (In Additional information requested) A1: There is a hierarchy of allocation. An allocation is provided to the GTC holders on a 5 year cycle and could be subject to change if either of the previous two priorities are compromised. A quota is administered annually and includes an administrative guideline of 30% that allows the Licensed Guide Outfitter to exceed what would be an even split of an allocation over 5 years. It is the Provinces goal to maximise use of the resources and there are occasions where requests from GO's are entertained by the Regional Manager to increase quota to allow for use of the entire allocation. This decision is made in consideration of all the factors with Conservation as a primary. A2: No key performance requirements for a GO. Requirements in Wildlife Act are specific and could be evaluated by the Regional Manager. Conditions of the GO License can be reviewed at any time. A3: There is no regional provision for reallocation of wildlife between categories of users. A4: The Province has the authority to approve all GTC transactions, with the exception of a change in primary controller of a corporation. The province does not play a role in the marketing or governance of GTC value. A5: It is a condition of the GTC that there be use associated with the tenure. Administrative action can be taken against the holder if the condition is not met. A request to the Regional Manager can exempt them from this condition if circumstances exist for approval. A6: No. A GTC can be surrendered and the Wildlife Act identifies means for disposition by the Regional Manager.		

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Interaction Number	Date	TL	Project	Type of Interaction	Attendees/Correspondants	Subject Area	Summary of Issues and Concerns (Project-specific Interactions)	Additional Information Required	Proposed Mitigations Batnuni
84	2021-10-01		x	Email	E.Frisch (QP) to T.Larden (FLNRO)	FLNRORD Information Request	The publicly available historical Non-Resident hunter data from 1998 to date (Licensed, Effort(Days) and Kills for 6-01 for Bull Moose was provided to FLNRO with interpretive questions. Particularly how overlapping Guide Outfitters in 6-01 and how their harvest is shown in the data.	1. If a Guide Outfitter receives a 5 year quota of 20 moose, with a year 1 limit of 5, can it be assumed that unless population figures allow, any animals not killed, may not necessarily be carried forward into future years' allocations? Specifically if no effort is made, or if the success ratio was low, the allocation remains 20 moose for the 4 years remaining, but dependent on the next years' population and allocation (e.g. the change between 2014 and 2015) 2. What are the key performance requirements for a Guide Outfitter to comply with their certificate contract? ; e.g. must make a certain effort be made? How is this demonstrated? By number of NR Licenses? Is there a 5 year review of allocation versus performance? lease help us understand how GO Certs might be managed through change: 3. Does FLNRO retain the policy of allocating any unharvested Non-Resident wildlife to Resident hunters? 4. How is this transition addressed if a business with a Certificate Area is for sale? 5. Can a buyer choose to acquire a Guide Outfitting Certificate Area and not exercise the associated opportunities? 6. Does the BC Government allow Guide Outfitting Certificate areas to be eliminated and if yes, under what circumstances.	
83	2021-09-23		x	Email	E.Frisch (QP) to All Batnuni, FLNRO, BW Gold	Followup to all Introductory phone calls	Summary of introductory phone calls to all Batnuni and BW Gold Teams: ^ Discussed a high level approach and the proposed schedule. Batnuni Advisors noted J.Linnell is guiding and not available for a call or a meeting until his return in later October. ^ J.Linnell is personally leading the review of the materials sent previously in the month, and has not provided direction for these to be reviewed or commented upon in his absence. ^ there are few potential misunderstandings and differences in terminology and interpretation ^ Interest in a "sit down, face to face" meeting this fall, is being explored. Covid protocols and public health orders are a consideration for in person meetings. ^Use video platform a proposed option with camera's on to support a more direct contact approach. ^ BW Gold will evaluate the proposed schedule and implications of Batnuni and advisors availability and seek compressed opportunities for engagement. ^ BW Gold offers further opportunity to provide background explanation about the proposed Mitigations to the Batnuni Advisors who are available. ^ Andy to provide a mitigation matrix from Mine Watch. ^ BW Gold wil share a proposed amended approach to the schedule to support planning in November and December. ^ BW Gold to await any further input from J.Linnell and A.Ackerman in the interim (with the caveat that Kevin is away October 3 – Nov 1.)	^BW Gold to update schedule to take into account Batnuni availability. ^ Batnuni Advisors who are available before the end of October to confirm interest to review the Condition 38 documents with QP before Batnuni return (in 5 weeks)	
82	2021-09-23		x	Telephone Call	E.Frisch (QP) to K.Church (Batnuni)	QP Introductions and Background	Followup on recent correspondence and discuss Condition 38 approach and understand key issues. K.Church has not discussed documents with client. K.Church is away October 3 - November 1 and cannot consult with his client or provide any feedback to BW Gold until that time. Batnuni feels matters can be resolved quickly with a face to face meeting.	K.Church to review the documents and discuss approach with client upon their return from hunting.	Adjust schedule to account for Batnuni field availability in late October.
81	2021-09-22		x	Telephone Call	E.Frisch (QP) to A.Ackerman (Batnuni)	QP Introductions and Background	Followup on recent correspondence and discuss Condition 38 approach and understand key issues. A sit down face to face meeting was suggested by Batnuni in October. Parties need trust-building. Batnuni feels the approach must address the economic loss. BW Gold believes a loss has not been demonstrated.	J.Linnell, has a mitigation chart from "Mine Watch" which Andy A will ask to be shared.	Explore potential model of annual compensation based on financial impact that season.
80	2021-09-21		x	Email	E.Frisch (QP) to K.Church (Batnuni)	QP Introductions and Background	Confirm time for call on Sept 23 and direct phone number.		
79	2021-09-21		x	Email	E.Frisch (QP) to K.Church (Batnuni)	Follow-up on September 3 and 10 Condition 38 Letters	E.Frisch did not receive a VM or call matching the telephone number on the email, however, if it was a cell number it was unknown. Availability for Thursday, Sept 21 was provided with Kathy P joining.		
78	2021-09-21		x	Email	K. Church (Batnuni) to E.Frisch (QP)	Follow-up on September 3 and 10 Condition 38 Letters	A VM was left by K.Church last week and not returned. Meeting times/dates are tomorrow and the next day in the morning.		
77	2021-09-21		x	Email	T.Larden to Batnuni/BW Gold	Follow-up on September 3 and 10 Condition 38 Letters	All documents have been received by FLNRORD and awaiting a meeting of all parties to discuss. Please copy TL on future meeting dates and correspondence.		
76	2021-09-21		x	Email	E.Frisch (QP) to Batnuni (J.Linnell, K. Church, A.Ackerman, T. Larden (FLNRO)	Proposed Approach to Completing Condition 38	Seeking a time for introductions and review the proposed process, timing and answer any questions regarding the documents.		

BW Gold – Batnuni Engagement Report January 2016 to Date: Condition 38

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Interaction Number	Date	TL	Project	Type of Interaction	Attendees/Correspondants	Subject Area	Summary of Issues and Concerns (Project-specific Interactions)	Additional Information Required	Proposed Mitigations Batnuni
75	2021-09-14		x	Telephone Call	E.Frisch (QP) to K.Church (Batnuni)	Proposed Approach to Completing Condition 38	Voicemail seeking a time for introductions and review the proposed process, timing and answer any questions regarding the documents.		
74	2021-09-11		x	Email	A.Ackerman (Batnuni) to E.Frisch (QP), K.Church, J.Linnell, T.Larden (FLNRO)	Proposed Approach to Completing Condition 38	Jim and Lyle are not available until after October 20th as they are heading to their guide area and they will be in touch once they return and are ready for a meeting. Please keep Kevin and Andy copied on all correspondence. Kevin will be responding in more detail in the next week or so.		
73	2021-09-10		x	Written Letter	E.Frisch (QP) to Batnuni (J.Linnell, L.Barsby, K. Church, A.Ackerman, T. Larden (FLNRO)	Proposed Approach to Completing Condition 38	BW Gold provides draft Mitigation Table, Summary of Concerns, Engagement Report, offers to have a telephone call the following week to review the documents in more detail.	Response from Batnuni and FNLNRO on availability to schedule Condition 38 discussions and affirm the approach to engagement.	
72	2021-09-03		x	Written Letter	BW Gold (R.Todd) to Batnuni (J.Linnell, L.Barsby, K. Church, A.Ackerman, T. Larden (FLNRO)	Proposed Approach to Completing Condition 38	BW Gold clarifying the August 4 field notification was with regard to the Transmission Line Engagement which is related to Condition 39. not Condition 38. Batnuni notified of Condition 38 QP, Ellen Frisch. The purpose of the letter is to develop a shared approach to engagement and a timeline to achieve draft Condition 38. A proposed approach for Batnuni and FLNRO Input was provided. Acknowledge the business operates September to October and providing 14 ays to allow for a response to the proposed approach.	Review of Engagement Log from 2012 to 2016.	
71	2021-08-30		X	Telephone Call	BW Gold (E.Frisch) to T.Larden (FLNRORD)	QP and FLNRORD	Purpose of the call was to make introductions and confirm FLNRORD's expected role in Condition 38. TL noted his role is to support his tenure holder and make recommendations as to whether the mitigations can support their business. EF enquired if he is aware of where in 6-01 Batnuni exercises their activities and his role is to manage at a larger area and ensure the conditions of the certificate are maintained. TL noted that guiding services are more than pulling the trigger, but he was unaware of other non-consumptive guiding services were offered. SDM preferenece is being involved is through calls and meetings with all the Parties. EF noted its the intention of BW to submit the Condition 38 on December 1 to accord with 90 days in advance of a March 1st early works date. No concerns were expressed with this timeline.		
70	2021-08-10	x	x	Written Letter	Batnuni (K.Church) to BW Gold	Notification of 2021 Field Work; Transmission Line Route Survey	Concern that BW Gold is notifying Batnuni of planned works and timing. BW Gold should be engaging on impacts.		BW Gold should engage on impacts.
69	2021-08-04	x	x	Written Letter	BW Gold to Batnuni	Notification of 2021 Field Work; Transmission Line Route Survey	The summer program will not involve any disturbance to the land or water and there will be no heavy equipment utilized, with the off-road work being completed on foot or with the aid of ATVs or pickup trucks		
68	2021-07-19		x	Email	BW Gold (C.Alderson) to Batnuni (J.Linnell)	BW Gold Good Faith Offer	Appreciate the feedback and sorry Batnuni was not happy with the offer.		
67	2021-06-28		x	Email	Batnuni (J.Linnell) to BW Gold (C.Alderson) cc to L.Barsby, Ackerman, Church	BW Gold Good Faith Offer	Batnuni provided summary of history (including their view that the primary mitigation opportunity is compensation), interpretation of takeaways from June 18 call. Rejected offer made by BW Gold characterized as ridiculous and insulting.		Compensation
66	2021-06-18		x	Meeting (Virtual)	BW Gold (C.Alderson/K Poettker), Batnuni (J.Linnell)	BW Gold Good Faith Offer	BW Gold (C.Alderson) discussed the process BW Gold undertook to arrive at a good faith offer. Important to note, it was made clear that this was not the value that BW Gold put on the Certificate Area. Offer of one time payment rejected by Batnuni.	Response to offer from BW by Batnuni	Artemis offer of one time payment rejected by Batnuni with comment it is ridiculous, insulting and zero good faith
65	2021-06-08		x	Email	BW Gold (C.Alderson) to Batnuni (Linnell)	Batnuni recap to date of interaction with BW Gold since Artemis purchased	BW Gold responds to Batnuni June 3 email. Needs to address work done with CEO. Commits to responding to Batnuni and setting up a call to discuss.		
64	2021-06-03		x	Email	Batnuni (Linnell) to BW Gold (C.Alderson)	Batnuni recap to date of interaction with BW Gold since Artemis purchased	Batnuni recap to date of interaction with BW Gold since Artemis purchased	Is BW Gold still interested in resolving the matter - ie: Condition 38	
63	2021-05-11		x	Email	BW Gold (K.Poettker) to Batnuni (J.Linnell)	BW Gold follow-up on Batnuni Business Economics	K.Poettker has forwarded a brief with information provided by J.Linnell for internal review.	BW Gold analyzing information from Batnuni	
62	2021-05-01		x	Email	J.Linnell to K.Poettker	General	Shared news story on mining.com of Artemis value of Blackwater mine at \$10b.		
61	2021-04-30		x	Telephone Call	K.Poettker to J.Linnell	BW Gold follow-up on Batnuni Business Economics			
60	2021-04-28		X	Email	K.Poettker to J.Linnell	BW Gold follow-up on Batnuni Business Economics	Status of requesting information on harvest data from the FLNRORD. Set up a phone call to discuss.		
59	2021-04-16			Email	J.Linnell to K.Poettker	BW Gold follow-up on Batnuni Business Economics	J.Linnell confirmed he requested harvest information from FLNRORD.		

BW Gold – Batnuni Engagement Report January 2016 to Date: Condition 38

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Interaction Number	Date	TL	Project	Type of Interaction	Attendees/Correspondants	Subject Area	Summary of Issues and Concerns (Project-specific Interactions)	Additional Information Required	Proposed Mitigations Batnuni
58	2021-04-16		x	Email	BW Gold (K.Poettker) to Batnuni (J.Linnell)	BW Gold follow-up on Batnuni Business Economics	Clarifying the rationale for the request for Harvest data before 2019. The table provided by Batnuni which showed 2009 - 2015 harvest data also included other Non-Resident Harvest, so its unclear what harvest was associated with L.Barsby only. BW Gold is preparing a valuation which typically looks at historical information as one point for informing projections. Further questions were asked to refine the valuation.	1. How the purchase of Certificate was addressed in costs; sunk or operational and what the 20% represented. 2. How use of Agents is addressed in the 20% cost.	
57	2021-04-15		x	Email	Batnuni to BW Gold	BW Gold request for a follow-up meeting and to receive Allocation/Harvest Data and business economics.	1) Financials are combined across 3 Game Management Units and can not be broken out for Davidson. Harvest has been 0 since 2015 as effort was 0. 2). Allocation and Harvest data from 2005 - 2008 was declined to be provided as irrelevant. 3. Operating cost estimated as a % of gross revenue. 4. Loss calculations based on gross revenue and expectation of inflation of hunt price summarized.		Compensation options are based on the Moose Quota for the 6-01 of 4 at the advertised cost, plus a typical bear harvest annual income, and the assumption hunt costs double every 10 years. Life of mine is 61 years. Lump sum or 'buy out' is sought.
56	2021-04-15		X	Telephone Call	J.Linnell to K.Poettker	BW Gold request for a follow-up meeting and to receive Allocation/Harvest Data and business economics.	Discuss email request for more detailed information.		
55	2021-04-14		x	Email	BW Gold to Batnuni	BW Gold request for a follow-up meeting and to receive Allocation/Harvest Data and business economics.	Seeking tangible information to assess financial impacts on operations.	1) Financial statements, 2) Number of moose and bear hunts for the L.Barsby and Batnuni as a whole from 2005 to date. Have L.Barsby certificate information from 2009 - 2015 which also includes Non-Resident hunts. 3) Moose quota per year from 2005 to date. (There are different numbers and this needs to be clarified) 4) typical operating costs for hunt	
54	2021-04-12		x	Telephone Call	BW Gold (C.Alderson/K.Poettker) and Batnuni (all)	BW Gold Information Request about Bathuni Business Operations and Impacts	Purpose of the meeting is to establish a deeper understanding of the issues and to advance further dicussions as required by Condition 38. Batnuni expects a fair solution to the impact of the BW P Questions were asked and answered in detail (Meeting records available); a. How GO Licenses and GTCs work in relation to FLNRORD and Wildlife Allocations, Quotas. Laws applying to GOs, Hunting Season, verbal quotas shared; b. Revenue: Price of Hunts, manner of hunting (groups or singles). c. Costs: No infrastructure in the Davidson. Infrastructure is horses. Operating expenses are "just in time" if a hunt is booked and applies to guides and cooks who are contracted as need. d. Batnuni challenges: 2013 seismic drill rigs began. 2015 was the last year hunts were offered. Wilderness experience with increased access, motorized vehicles, camp visual. Refund was required once in the past due to the distractions during the hunt (nature of and the year not clear). Great fire only took a 'silver' of GTC 5-13. Covid and US Travel restrictions were hurting all businesses relying on US customer base. e. Financial Statements: Batnuni provided them in 2016. BW Gold does not have this information and it would be helpful to receive. No detailed information discussed. f. Q&A on the project - No comments or questions on the project from Batnuni.		Typical mitigations may be: Company pays GO to not Guide at certain times. Company only operates at certain times. Combination of money / mitigation measures.
53	2021-04-09		x	Written Letter	Batnuni to BW Gold	BW Gold Information Request about Bathuni Business Operations and Impacts	Response to 16 questions regarding clientele, marketing of business, who are the customers, seasons, planning, staff, numbers of hunters, ratio of staff, advance bookings, infrastructure, length of typical trip, dependency on successful hunt, costs incurred, government regulations. Confirm meeting April 12 to review.		
52	2021-04-05	x		Written Letter	BW Gold to Batnuni	BW Gold Information Request about Bathuni Business Operations and Impacts	BW Gold clarifying the February 26 letter to Batnuni from BW Gold was with regard to the (Condition 39) Transmission Line, not the Condition 38 engagement. Outline of new questions to pursue acquiring more information to further conduct analysis on any impacts.	16 questions regarding clientele, marketing of business, customers, seasons, planning, staff, numbers of hunters/personnel, infrastructure, length of typical trip, dependency on successful hunt, government regulations	
51	2021-03-22	x		Written Letter	BW Gold to Batnuni	Condition 39: Transmission Line Phase 1 Routing Notice Letter	Response to February 26, Transmission Line Routing engagement invitation. Process focused concern. Batnuni is awaiting meaningful consultation and mutually acceptable accommodation. Transmission line diminishes the wilderness experience due to visual and wildlife effects. Consultant has been non-existent. More than updates through correspondence is required.		Different form of engagement. Mutually acceptable accomodation
50	2021-02-26	x		Written Letter	BW to Batnuni	Condition 39: Transmission Line Phase 1 Routing Notice Letter	Letter explaining Condition 39 and requirement to consult with First Nations, Crown agencies, property owners, tenure holders etc, and Batnuni interests may be affected. BW Gold is seeking Batnuni's views on the potential affects of the routing alternatives, adequacy of the proposed mitigation measures (provided in an attachment) and requesting written comment by March 23, 2021. Detailed map of GTCs, Forest Service Roads and Transmission Lines options provided.	BW soliciting feedback on routing options and proposed mitigation measures	

BW Gold – Batnuni Engagement Report January 2016 to Date: Condition 38

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Interaction Number	Date	TL	Project	Type of Interaction	Attendees/Correspondants	Subject Area	Summary of Issues and Concerns (Project-specific Interactions)	Additional Information Required	Proposed Mitigations Batnuni
49	2020-10-22		x	Written Letter	BW (CEO of Artemis) to Batnuni (Jim) with cc to EAO and MEM	Condition 38	BW Gold fully committed to obligations under #38 Reiterated that feedback welcomed on 2021/22 drilling program and received no substantive feedback from Batnuni to date.. Confirms no construction activities have commenced that would trigger obligations under #38	To prepare for discussions on Condition 38 please provide - documentation on foregone revenue as a result of exploration activity - projections of foregone revenue due to future mining activity - quantifiable impacts information (ie: number of trips, number of guests, specific timing / location of hunts)	
48	2020-10-15		x	Written Letter	Batnuni (Jim) to BW (CEO of Artemis)	Condition 38	- Batnuni wants to ensure CEO aware of condition - Batnuni now suggesting 60 year impact - Batnuni reiterating statements from prior communication either referenced or documented - Batnuni raising the dismantling of the camp - process of contacting Mines and EAO to discuss		
47	2020-09-29		x	Note to File re Call	BW (R. Todd) to Batnuni	2020/2021 Drilling Program	BW Gold enquired specifically if "any hunts scheduled this year that he has had to cancel" (Batnuni - "no") BW asked for more clarification on dismantling of camp. J.Linnell claims he has a letter on file from MEM that says camp is to be dismantled. BW clarified the camp is fully permitted, and BW has not seen such a letter. BW Gold asked if there are specific concerns, etc on the drilling program (Batnuni - "no")Continued themes as noted above - Batnuni claims impacted since exploration commenced - BW not undertaking consultation		
46	2020-09-28		x	Email	BW (R. Todd) to Batnuni	2020/2021 Drilling Program	R. Todd advising Batnuni tried several times to connect and left direct line to call R. Todd		
45	2020-09-23		x	Note to File	BW (R. Todd) to Batnuni	2020/2021 Drilling Program	No answer, messages left 9.23/9.18		
44	2020-09-17		x	Email	Batnuni to BW	2020/2021 Drilling Program	Requested schedule for dismantling the exploration camp		
43	2020-09-15		x	Written Letter	BW to Batnuni	2020/2021 Drilling Program	Change of ownership from New Gold to Artemis of BW Project (BW Gold) Mobilize to camp around Oct 2020/Drilling expected to continue into Spring 2021 Map of activity included		
42	2020-08-03		x	Email	BW to Batnuni	BW Project Summer 2020 Newsletter	BW provided download link.		
41	2020-08-02		x	Email	Batnuni to BW	BW Project Summer 2020 Newsletter	Batnuni asking where they can download	Link to download Newsletter	
40	2019-09-30		x	Email	BW to Batnuni	Update to 2019 Exploration Work	Work has been extended and demobilization is now Oct 19 Not planning any further exploration work this year in Batnuni GO area but still basing activities out of camp	Please advise BW if any areas of particular concern with respect to planned use over the next month	
39	2019-09-11		x	Written Letter	Batnuni to BW	Condition 38 Approach	Batnuni states that EAO has to approve the plan and given BW's behaviour over 7 years this will be difficult to achieve and that the Fed Minister of Environment told Batnuni that she also has to approve the plan. Batnuni raises compensation	Open to any solutions of how BW can create a Wilderness experience after constructing a 400 person exploration camp and operating during our season every year.	Compensation
38	2019-08-26		x	Written Letter	BW to Batnuni	Update - Batnuni History of Events	Response to July 24 letter, confirms R. Todd has authority for operational matters. The plan under the EAC is not required until 90 days prior to construction and looks forward to continued engagement. Updates on 2019 plans with map were provided.	Please advise BW if any areas of particular concern with respect to planned use over the next month	
37	2019-07-24		x	Written Letter	Batnuni to BW	Update - Batnuni History of Events	Timeline of events that in Batnuni's view demonstrate "lack of good faith ... has in this process in dealing with Batnuni".	Batnuni requesting who has the authority for operational matters	Requesting lost earnings for 40 years at a minimum + 8 years with interest
36	2019-07-19		x	Written Letter	BW to Batnuni	2019 Exploration and Reclamation Work	Nechako Plateau - reclamation of drill pads and trails, recontouring, seeing, planting and environmental management activities. May undertake exploration, including drilling, specifically on mine site Mobilization on Aug 6 and demobilization by the end of September.		
35	2019-03-08		x	Written Letter	BW to Batnuni	Update - Batnuni History of Events	Response to Batnuni's 1/23 email to the MLA. BW reiterates that any conversation on financial compensation is premature as project is not a "go" until EA certificate obtained AND optimization activities are advanced BW has communicated with Batnuni on all project activities since inception of project No plans for any activity in 2019 within guiding area except to maintain the camp	Does Batnuni have guiding plans this year?	
34	2019-01-23		x	Email	Batnuni to MLA (cc to BW)	Update - Batnuni History of Events	Cannot use territory for last 7 years solely because of activity in the Davidson by BW. BW broken commitments to Batnuni on activity scheduling BW not showed any good faith "Govn't issues conflicting tenures when it's clear that they are not compatible but is just a cash cow for them"		
33	2018-09-07		x	Phone call	Batnuni (J.Linnell)/BW (R.Todd)	Follow-up from 8/20 call	BW advised Batnuni that BW Gold is not interested in buying the GTC at this point. Expect EAO will impose condition on future discussions between BW and Batnuni		
32	2018-08-20		x	Written Letter	BW Gold to Batnuni	2018 Field Plans	Update to Field Plans due to Wildfire - Fire Crews to use the BW Camp, thereby delaying camp use for Field Program. Likely works after Sept 1 but concluding by October 1.		

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31	2018-08-20		x	Email	Batnuni to EAO (Tavis)	Status of EA	Batnuni looking for update on EA and concerns Batnuni raised. Tavis suggested reach out to BW (R.Todd) directly to continue discussions		
30	2018-08-20		x	Phone call	Batnuni (J.Linnell)/BW (R.Todd)	Status of EA	Batnuni advised no activity around BW Fall 2018 and Batnuni updated R.Todd on previous discussions with BW (Tim left BW)	Update on compensation discussion.	Compensation
29	2018-07-24		x	Written Letter	BW Gold to Batnuni	2018 Field Plans	Mobilization will occur in mid-August for (3-4 weeks) / Demobiliation will occur by end of Sept -- non invasive work		
	2018-04-19			Telephone Call	BW Gold to Batnuni	Batnuni Effects and Mitigation	Call to discuss timing and any next steps for the Parties to separately respond to EAOs request for an update on discussions after the Nov 6/2017 meeting.		
28.2	2018-04-18			Email	EAO to BW Gold, Batnuni	Batnuni Effects and Mitigation	EAO requesting an joint report out from Batnuni and New Gold by May 4, 2018 on progress to understand the effects and proposed mitigations.		
28.1	2018-02-07		x	Meeting (In Person)	BW Gold to Batnuni		Discussed incompatible tenure issues.		
28	2017-11-06		x	Meeting (in person) + Teleconference	EAO, CEEA, Batnuni (incl Andy A & Kevin C - advisors) MMPO, BW Gold	Batnuni Effects and Mitigation	Discuss concerns raised by Batnuni to further understand the effects and discuss proposed mitigations and how they may be addressed in the EA and subsequent tenuring		
27	2017-09-18		x	Written Letter	BW Gold to Batnuni (copy to FLNR and EO)	2017 Project Reclamation Work Notification	Response to Batnuni concern regarind reclamation works. Initial notice of works for 2017 sent in June with no response from Batnuni until September. The change of schedule arose due to wildlife impacts, not an intentional schedule change by New Gold. [NTR: Batnuni has advised they stopped offering hunts in 2015 in the Davidson so they would presumably not have sold hunts for September 2017.)		
26	2017-09-11		x	Email	Batnuni to BW Gold (copy to FLNR and EO)	2017 Project Reclamation Work Notification	Batnuni suggesting they were already in camp (NTR: Camp is in a different GTC outside of #601039)and suggesting Batnuni cannot use the Davidson (GTC #601039) yet again this year and that BW Gold is changing their schedule to fit their own requirements.		
25	2017-09-07		x	Written Letter	BW Gold to Batnuni	2017 Project Reclamation Work Notification	Notification that fire evacuation orders had been lifted and reclamation work would occur in mid to late September for 2-3 weeks. There would be no land disturbance, no drilling, no line cutting or trail construction.		
24	2017-07-31			Written Letter	Batnuni to BW Gold	Wildfire Notice - Hosting Crews	General letter advising that BW Gold camp site will be used by BC Wildlife Service Crews and confirms access by vehicle or potentially helicopter depending on fire behaviour		
23	2017-07-04		X	Email	Batnuni (J.Linnell) to BW Gold (Claudette)	Seeking a Face to Face meeting with New Gold	Followup on request to BC EAO (T.McDonald) to schedule a meeting between New Gold and Batnuni		
22.1	2017-06-29			Written Letter	BW Gold to Batnuni	New Gold Field Survey Work	Notice of field exploration program.		
22	2017-06-19	x		Written Letter	Batnuni to BW Gold	TL Alignment -- Condition 39 / not Condition 38	Response to June 13 letter Batnuni's interpretation of "meaningful Consultation" and have not followed any of the 8 steps in the Practical Guide		Compensation
21	2017-06-13	x		Written Letter	BW Gold to Batnuni	TL Alignment -- Condition 39 / not Condition 38	BW Gold clarifies that the Myriad Report contains a number of factual inaccuracies wrto interactions of the parties and therefore the conclusions and recommendations cannot be relied upon. - Specifically, March 31 2017 BW advised Batnuni (via email) regarding changes to TL and offered to meet to discuss the TL realignment. April 5 2017 Batnuni responded to discuss compensation, disregarding the opp to discuss the TL realignment.		
20	2017-04-29	x		Written Letter	BW to Batnuni	2017 Field Survey Work Notification	TL Alignment including surveying, mapping and classifying habitats and archaeological sites btw June and Sept		
19	2017-04-27	x		Written Letter	Myriad (A. Ackerman on behalf of Batnuni) to Batnuni	TL Alignment -- Condition 39 / not Condition 38	Myriad itemizes issues with the TL Alignment proposal ("March 2017 Effects Assessment of Proposed Change to the Transmission Line Alignment Addendum Report") with respect to Batnuni's interest		
18	2017-04-13	x		Email	BW Gold to Batnuni	TL Alignment -- Condition 39 / not Condition 38	Response to Batnuni Apr 4 email		Compensation
17	2017-04-04	x		Email	Batnuni to BW Gold	TL Alignment -- Condition 39 / not Condition 38	Batnuni suggesting they can make their comments through the EAO and again referencing the tenure conflict (Condition 38) and specifically compensation Confirming April 27 for a meeting with FLNRO, Batnuni (+ A. Ackerman and K. Church)		Compensation
16	2017-03-29	x		Written Letter	BW Gold to Batnuni	TL Alignment -- Condition 39 / not Condition 38	Proposed Change to the TL Routing		
15	2016-11-29		x	Written Letter	Batnuni to BW Gold	2016 Exploration Program	Not able to offer Wilderness hunting experience		
14	2016-11-02		x	Written Letter	BW Gold to Batnuni	2016 Exploration Program	Response to Oct 29 2016 letter from Batnuni in response to the update letter provided by BW Gold on Oct 24 - confirming BW season ran as planned - would have communicated completion sooner re: camp official closure had received any feedback in regards to ongoing notice wrto 2016 Exploration Program		

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Interaction Number	Date	TL	Project	Type of Interaction	Attendees/Correspondants	Subject Area	Summary of Issues and Concerns (Project-specific Interactions)	Additional Information Required	Proposed Mitigations Batnuni
13	2016-10-24		x	Written Letter	BW Gold to Batnuni	2016 Exploration Program	Site now demobilized Contact information provided for site personnel/site security		
12	2016-08-08		x	Written Letter	BW Gold to Batnuni Legal	Response to Analysis of Business Operation / Financial Information	Response to Batnuni June 3 2016 meeting regarding compensation: - financial info provided by Batnuni did not demonstrate the Batnuni has suffered business losses - BW Gold not currently undertaking any exploration work, therefore no effects at this time - BW Gold cannot engage in negotiations for compensation for future activities, which at this time there is no guarantee will occur		
11	2016-07-11		x	Email	Batnuni (K.Church) to BW Gold	Sharing of Batnuni Business Operation / Financial information on a without prejudice basis.	Seeking the timing of response to Batnuni following the June 3, 2016 meeting.	New Gold response to 6/3/16 aterials.	Compensation
10	2016-06-03		x	Meeting (In Person)	New Gold (R.Todd, C.Kowbel) and Batnuni (J.Linnell, K.Church)	Sharing of Batnuni Business Operation / Financial information on a without prejudice basis.	Batnuni provided business financial and harvest data on a confidential and without prejudice basis. Affirmed operating window of April - June and September, October. Batnuni disappointed that the meeting did not have 'decision makers' present, though New Gold understood attendance aligned with the meeting objective of receiving information.	New Gold response to 6/3/16 materials.	New Gold to respond within one month following review of the Financial information and harvest data.
9	2016-05-24		x	Written Letter	BW Gold to EAO (Tavis)	Response to Batnuni Letter	Batnuni letter stated inaccuracies and raised new issues Clarified re: inaccuracies (noise, flight frequency, wildlife habitat, Vanderhoof Land & Resource Mgmt. Plan		
8	2016-05-17		x	Written Letter	BW to Batnuni	2016 Exploration Program Notice	No new disturbance		Matrix Chart but no specifics - just reference to the Matrix Chart Compensation
7	2016-05-13		x	Written Letter	Batnuni to EAO (Tavis)	Comprehensive Project Description and Overlap of GTC #601039	Response to New Gold April 29 letter. David & Goliath argument (BW impacts Batnuni, but Batnuni harvesting an animal does not impact BW) Contradicts assertions that BW makes regarding impacts (in general) and specifics of the 6% overlap not being the relevant measure - the Davidson is the "crown jewel" and non-motorized access was crucial Suggests that BW did not comply with it's own minimal efforts to minimize activities during hunting season BW Gold has not come to the table with any compensation		Matrix Chart but no specifics - just reference to the Matrix Chart Compensation
6	2016-04-29		x	Written Letter	Legal Rep (Batnuni) to Legal Rep (BW)	Response to BW: Follow up from 20-April meeting	Tenure overlap conflict discussions and specifically compensation for damages proposed by Batnuni	Harvest Data obtained from Ministry for Cert Calculation of damages of \$1.1M US	Batnuni suggesting outright purchase of Cert or annual interference fee
5	2016-04-29		x	Written Letter	BW Gold to EAO (Tavis)	Comprehensive Project Description and Overlap of GTC #601039	A 14 page letter detailing every project component and overlap and potential interaction with Batnuni operations. Maps showing overlay of the GTC, Roads, Transmission Line, Project Mine Site, Offsite Infrastructure, Mine Access Road, Vanderhoof LRMP Access Management Zones.		
4	2016-04-19		x	Written Letter	BW Gold to Batnuni	Response by BW to meeting request on April 20 by Batnuni (April 20 meeting held without prejudice)	Tenure overlap conflict discussions	BW to Batnuni: has Batnuni identified any specific measures regarding communications or notice of operations that may be of assistance and openness to discussion of other measures or accommodations that Batnuni has identified that would resolve concerns expressed by Batnuni that were expressed to BCEA	
3	2016-04-07		X	Written Letter	BC EAO to New Gold (T.Bekhuys)	Comprehensive Project Description and Overlap of GTC #601039	A request to prepare the comprehensive project summary, and references to the the GOABC Mitigation Matrix, the FLNRO Practical Guide to Effectie Coordination of Resource Tenures and the "Land Procedure, Integratnig Overlapping Land Use"	EAO Letter Requested: 1. A comprehensive description of BW Gold Project activities that would overlap with the Certificate 2. An explanation of BW's understanding of the compatibility of these activities with the rights held by Batnuni.	
2	2016-02-19		x	Written Submission	K. Church (legal to Batnuni)	Reply of Batnuni to Application for EAC for BW Gold	Batnuni rationale for 2005 purchase of Cert 601039 (already had 500948) - "wilderness experience on horseback/Non-Motorized" Davidson is the valued portion of Cert Area Summary of Batnuni's view of consultation history with BW Gold Impacts on Batnuni AND the Davidson (sensory disturbance due to air strip construction, roads, pipelines and power corridors as well as impact from mine activity itself and the 1500 person camp, prohibition of firearms due to the Mines Act) Makes specific comments in dispute of elements in the BW Gold Application		Model matrix which provides for short-term and mid-term and long-term solutions to issues as used by resource extraction projects. Claims New Gold dismissed as "having relevance to oil and gas production not mining" Compensation from New Gold
1	2016-01-13		x	Email	BW Gold to Batnuni	Dates for meeting with Project Director in Kamloops or by phone	Response to K. Church (Batnuni) letter of Dec 7 2015		

Appendix D Mitigation Measures

Appendix D: Mitigation Measures Matrix

Blackwater Gold Project Environmental Assessment Certificate M#19-01 (EAC) Condition 38 Tenure Holder Communication and Mitigation Plan and Report

February 11, 2022

The Mitigation Measures table identifies two reporting mechanisms:

1. Tenure Holder-specific mitigations which will be monitored to determine their effectiveness and be adaptively managed pursuant to EAC Condition 3 (Adaptive Management) and reported under the Tenure Holder Monitoring Report.
2. Secondary mitigations contained in other listed environmental management plans or are commitments made during the environmental assessment review. Monitoring and reporting of the effectiveness of these measures is required through the implementation of those plans. While 'secondary' in the Condition 38 context, they are primary measures and benefit a broad range of valued components.

The proposed Tenure Holder-specific mitigations follow the SMART principle and are focused on initiatives to be undertaken in Year 1 and monitored for success and adapted as necessary.

Specific, Measurable, Achievable, Realistic and Time Frame

ID	Theme	Proposed Mitigation	Reporting Tool
1.	Information Sharing	BW Gold will advise the Tenure Holder of the process required in order to receive notification of filed regulatory documents on the BW Gold Project.	Tenure Holder Monitoring Report
2	Emergency Response	Contacts and appropriate communication methods for reaching the Tenure Holder in the event of an emergency, will be sought from the Tenure Holder and will be incorporated into the named Plans where notification is applicable.	Tenure Holder Monitoring Report
3.	Visual quality and wildlife impact mitigation	Locate the transmission line in existing disturbed areas, as will be described in the Final Transmission Line Routing Plan.	EAC Condition 39 Final Transmission Line Routing Plan EAC Condition 23 Wildlife Mitigation and Monitoring Plan <ul style="list-style-type: none">• Section 3.4 Transmission Line Management
4.	Visual quality and wildlife impact mitigation	Use existing roads and follow existing linear disturbances to support transmission line construction, as will be described in the CEMP (Construction Environmental Management Plan)	TL Construction Environmental Management Plan EAC Condition 39 Final Transmission Line Routing Plan

ID	Theme	Proposed Mitigation	Reporting Tool
5.	Visual Corridor/Visual Impacts	Maintain vegetated buffers adjacent to mine facilities and roads. Exceptions will include areas that will be managed for wildlife and human safety as will be described in the CEMP.	EAC Condition 13 Construction Environmental Management Plan Visual Impacts Management Plan
6.	Access Management	BW Gold will establish an Access Management Working Group (AMWG) and invite participation from Aboriginal Groups, appropriate regulators, and local communities. Input will be used to inform the Traffic and Access Management Plan (TAMP). Batnuni is invited to participate in the AMWG. The TAMP will include a component to monitor the effectiveness of mitigation measures and adaptive management.	EAC Condition 13 Construction Environmental Management Plan Section 15.1 Traffic and Access Monitoring
7.	Road Gates and Locks	Invite the Tenure Holder to participate in the Access Management Working Group. (Done) Access maps will be available with information related to locks and access.	Tenure Holder Monitoring Plan
8.	Access Management	Use buses or alternatives to personal transportation to transport workers to the mine site during Construction and Operations to reduce potential for traffic accidents, as will be described in the 'Community Effects Monitoring and Management Plan'.	EAC Condition 37 Community Liaison Committee and Community Effects Monitoring and Management Plan.
9.	Access Management	Participate in the Kluskus FSR industrial road users' group over the mine life.	Tenure Holder Monitoring Report
10.	Access Management	Restrict Project vehicles to designated roads and trails. Private vehicle access to the mine site will be limited to authorized personnel. Use of mine vehicles for recreational purposes will be prohibited at all times.	EAC Condition 37 Community Liaison Committee and Community Effects Monitoring and Management Plan. EAC Condition 13 Construction Environmental Management Plan
11	Communication on Shared Tenure Holder Activities	Establish a two-way communication process to share information and reduce project noise and interactions where possible. Include notifications related to off-site works, including the Transmission Line.	Tenure Holder Monitoring Report

ID	Theme	Proposed Mitigation	Reporting Tool
11a.	Communication on Shared Tenure Holder Activities	a) BW Gold will seek to receive information from the Tenure Holder regarding their activity and use of specific areas within the GTC in April – May and September – October. BW Gold understands that hunts may be booked for years in advance, and in that spirit, advising BW Gold of scheduled Tenure Holder planned hunts as early as possible each year, and ideally 2 times annually will facilitate dialogue about BW Gold planned activities outside the mine site.	
11b.	Communication on Shared Tenure Holder Activities	b. Notify Batnuni of proposed BW field and aerial activities (the nature of, timing and number of personnel and vehicles involved).	Tenure Holder Monitoring Report
11c.	Wildlife Abundance	c. Share non-confidential information of a public nature, collected by BW Gold relating to moose and grizzly bear populations.	Tenure Holder Monitoring Report
11d.	Noise and Vibration Management	d. Receive from Batnuni, identification of noise sensitive receptor sites as input into the Noise and Vibration Effects Monitoring and Mitigation Plan.	Tenure Holder Monitoring Report
11 e.	Shared Tenure Information	e. BW Gold will seek to receive from the Tenure Holder a map which indicates the specific trails and roads utilized for hunting activity.	Tenure Holder Monitoring Report
12.	Notification of Schedule and Access Resolution	Provide the construction schedule to tenure holders and recreational groups (including at least the Northwest Brigade Paddling Club, nearby lodges and the local offices of BC FLNRO) overlapping the Project, 30 days prior to the start of construction and resolve any issues related to access as per appropriate industry and provincial standards, guidelines and best practices.	EAC Condition 37 Community Liaison Committee and Community Effects Monitoring and Management Plan

ID	Theme	Proposed Mitigation	Reporting Tool
13.	Communication on Shared Tenure Holder Activities	Discuss with Batnuni the timing of work activities and associated timing buffers, outside of the Certified Project Description boundary, to avoid or minimize disturbances around primary hunting months of September and October.	Tenure Holder Monitoring Report
14.	Transmission Line Construction Notification	BW Gold is committed, as part of Condition 39, to notification to Batnuni and other groups related to field work and construction related to the Transmission Line.	Tenure Holder Monitoring Report
15.	Noise, Light and Sensory Disturbance	Minimize sensory disturbance due to noise and light in areas adjacent to the mine site and airstrip, including the use of noise abatement technology, equipment placement, regular equipment maintenance, and enforcement of speed limits.	Noise and Vibration Effects Monitoring and Mitigation Plan EAC Condition 13 Construction Environmental Management Plan <ul style="list-style-type: none"> • Table 9.5.1 Noise and Vibration Mitigation Measures • Table 15.9.1 Mitigation Measure Effectiveness Monitoring for Wildlife
16.	Training on Guide Outfitting interface	Include Guide Outfitter awareness information in regular safety and environmental inductions performed by the mine.	Tenure Holder Monitoring Report
17.	Noise and Vibration Management	Use noise abatement and schedule construction and decommissioning activities at noise-sensitive locations and times, where and when hunters, guide-outfitters and trappers are active to limit disruption to sensitive receptors (Hunting, Guide Outfitting and Trapping). Noise sensitive locations and specific mitigation measures will be identified in the Noise and Vibration Effects Monitoring and Mitigation Plan.	Noise and Vibration Effects Monitoring and Mitigation Plan
18.	Wildlife Abundance	Conduct additional fall surveys of moose activity in and moose sheds in the Mt. Davidson area. BW Gold will share non-confidential, public fall moose survey information to understand potential project influences.	EAC Condition 23 Wildlife Mitigation and Monitoring Plan Section 4.4.3.3 Moose Population Monitoring

ID	Theme	Proposed Mitigation	Reporting Tool
19.	Wildlife Abundance	<p>Conducting winter moose and caribou surveys at a suitable scale to monitor the local population for distribution and abundance prior to construction. Survey design will be developed during the permitting phase in consultation with provincial agencies and First Nations communities. Wolf observations will be noted. The surveys will be repeated at least every 5 years during mine operations to monitor trends.</p> <p>Areas to be surveyed to include the Mine Site, transmission line portion of the RSA (i.e., corresponding to the area used in the habitat loss and alteration analysis) and the Mine Access Road.</p>	<p>EAC Condition 23 Wildlife Mitigation and Monitoring Plan</p> <p>Section 4.4.3.3 Moose Population Monitoring</p> <p>Section 4.10 Monitoring of Mitigation Measures</p>
20.	Wildlife Abundance	Invite Batnuni to comment on the study design and scope of the winter moose survey planned for February/March 2022 as designed by the Project QP.	Tenure Holder Monitoring Plan
21.	Alternate Operating Area	Offer to assist Batnuni with alternate trail head “set up” elsewhere in the Certificate Area due to equipment and supplies already in the vicinity once construction commences.	Tenure Holder Monitoring Plan
22.	Wildlife and Road Use	Relevant provisions of the Wildlife Mitigation and Monitoring Plan will be considered for incorporation into road use agreements and communicated with Batnuni and other commercial users of BW Gold controlled access roads to which BW Gold enters into road use agreements.	<p>EAC Condition 23 Wildlife Mitigation and Monitoring Plan</p> <p>Section 3.6.1 Transportation and Access</p> <p>Section 3.6.2 Wildlife Activity on Roadways</p>
23.	Condition 43 Transmission Line Mitigations	BW Gold has committed to a number of mitigations related to Transmission Line construction, attached in Appendix 4. A comprehensive list of construction impact mitigations has been provided as part of Condition 43 and provided to Batnuni in the February 21, 2021 letter and on September 3 2021.	Applicable EAC Conditions identified in Condition 43

ID	Theme	Proposed Mitigation	Reporting Tool
24.	Monitoring and Reporting on Mitigations	<p>BW Gold will report annually on the status of the implementation of the Tenure Holder-specific mitigations above. The Tenure Holder may provide, in writing, any impacts experienced by the Tenure Holder. Impacts will be reviewed as they occur or annually when provided by the Tenure Holder.</p> <p>BW Gold will respond to valid impacts raised by the Tenure Holder with proposed actions, including adaptive measures, if applicable . The findings and actions will be reported in the Tenure Holder Monitoring Report.</p>	Tenure Holder Monitoring Report

Appendix E Schedule A: Certified Project Description

SCHEDULE A

Certified Project Description

BLACKWATER GOLD PROJECT
(PROJECT)

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 - 2.2 Freshwater Supply System**
 - 2.3 Airstrip and Access Road**
 - 2.4 Kluskus-Ootsa FSR Realignment**
 - 2.5 Mine Access Road**
 - 2.6 Mine Access Routes**
 - 2.7 Electrical Transmission Line**

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- Figure A1-2: Mine Site, Freshwater Supply System, Airstrip and Airstrip Access Road**
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INTERPRETATION

In this Certified Project Description, terms that are capitalized but not defined have the same meaning as those terms defined elsewhere in this Certificate, including the Table of Conditions.

This Certified Project Description describes the Blackwater Gold Project (Project) authorized by this Certificate but does not obligate the Holder to construct or operate any aspect of the Project, unless otherwise stated.

ACRONYMS

FSR	Forest Service Road
FWSS	Freshwater Supply System
km	Kilometre
m	Metre
Mt	Million Tonnes
ROW	Right of Way
TSF	Tailings Storage Facilities

1. PROJECT OVERVIEW, LOCATION AND ACCESS

The Blackwater Gold Project (Project) is an open pit gold and silver mine that will produce and process up to 22 million tonnes (Mt) of ore per year during up to 17 years of operations. Total production will be up to 344 Mt of ore, 690 Mt of waste rock, and 50.4 Mt of overburden. Ore will be processed in a process plant to be constructed north of the open pit.

The Project is located at 375500 E and 5893050 N in UTM Zone 10 from the centre of the open pit, approximately 160 kilometres (km) southwest of Prince George, 110 km southwest of Vanderhoof, 17 km southwest of Tatelkus Lake IR 28 and 25 km northwest of Kluskus IR 1. Project access is via the Kluskus Forest Service Road (FSR), Kluskus-Ootsa FSR and Mine Access Road, which connects to the Kluskus-Ootsa FSR at km 124.5. The Kluskus FSR joins Highway 16 west of Vanderhoof (shown on Figure A1-1 in Appendix A1).

The figures in Appendix A1 of the Certified Project Description Mapbook show the locations of the mine site, freshwater supply system (FWSS), airstrip and access road, Kluskus-Ootsa FSR realignment, Kluskus FSR, Kluskus-Ootsa FSR, and Mine Access Road. The figures in Appendix A2 of the Certified Project Description Mapbook show the locations of the transmission line and three re-routes.

2. PROJECT COMPONENTS AND ACTIVITIES (FIGURES A1-1 AND A1-2)

2.1 MINE SITE (FIGURE A1-3)

The following project components and infrastructure will be located within the Mine Site area:

Open Pit area including:

1. Open pit mine and dewatering system.

Plant Site area including:

2. Process plant to produce doré bars that must include a cyanide destruction circuit.
3. Temporary camp to accommodate up to 400 personnel during Construction.
4. Portion of the Mine Access Road.
5. Portion of the electrical transmission line.
6. Portion of the FWSS and booster pump stations.

TSF area including:

7. Site C and Site D tailings storage facilities (TSF), including dams.
8. TSF spillways for TSF dams.
9. Barge reclaim system.

TSF Seepage Collection System area including:

10. TSF seepage collection system, including a pumpback system which must be constructed prior to deposition of tailings in the TSF.
11. Plunge pool for discharge of water to Davidson Creek.
12. Environmental control dam.
13. Freshwater reservoir, including a dam and spillway.
14. Portion of the Mine Access Road and Bridges I, J and K.
15. Portion of the electrical transmission line.
16. Portion of the FWSS and booster pump stations.

Waste Rock and Low Grade Ore Stockpile area including:

17. Waste Rock Dump for permanent storage of waste rock and overburden, including surface water diversions.
18. Low Grade Ore Stockpile, including diversion channel, low-permeability foundation, and seepage collection system.

Main Construction and Operations Camp area including:

19. Main Construction Camp to accommodate up to 1,000 personnel during Construction.
20. Operations Camp to accommodate up to 500 personnel during Operations and Closure.

Lake 16 Enlargement and Lake 15/16 Connector Channel area including:

21. Enlargement of Lake 01682LNRS (Lake 16) and redirection into Lake 01538UEUT (Lake 15) including coffer dams, connector channel, and use of existing Lake 01538UEUT/Lake 01682LNRS access trail within the Lake 16 Enlargement and Lake 15/16 Connector Channel.

Components located anywhere within the Mine Site area:

22. Borrow areas and quarries.
23. Sand and gravel screening plant and cement batch plant.
24. Mobile crushing and screening plants.
25. Explosives storage and emulsion plant.
26. Bulk fuel storage and distribution facilities.
27. Propane storage and distribution.
28. Hazardous materials storage area.
29. Mine site haul roads and other site access roads.

30. Laydown areas.
31. Electrical distribution system, including pole line, electrical substation, and portable substations.
32. Satellite and telecommunications system.
33. Temporary construction phase power plant and emergency standby power plant.
34. Northern and Southern diversions for non-contact water.
35. Water management infrastructure including ponds, dams, ditches, foundation drains, pipelines, and structures for managing surface water.
36. Pit lake seepage collection system and spillway to the TSF.
37. Mine water treatment plants, ponds, pumps, and piping.
38. Fire suppression system.
39. Ancillary buildings including truck shop, warehouse, administrative building, mine dry, and emergency services building.
40. Topsoil stockpiles.
41. Potable water system.
42. Domestic sewage treatment system.
43. Incinerator system.
44. Industrial and domestic solid waste management areas.
45. Camp trailer to accommodate personnel during Closure and Post-Closure.

2.2 FRESHWATER SUPPLY SYSTEM (FIGURES A1-4A TO A1-4C)

1. An up to 14 km long pipeline to pump water from Tatelkuz Lake to a freshwater reservoir, constructed in an up to 10 metre (m) cleared right of way (ROW), except up to 50 m by 50 m cleared width at each of the booster stations and up to 100 m by 100 m cleared width at the land-based intake station. The FWSS must be constructed to augment flows in Davidson Creek due to the TSF. The FWSS will also be constructed to provide water for mine operations. The FWSS system must be constructed prior to the Project reducing flows below the instream flow needs in Davidson Creek.
2. An up to six m wide service road, with new construction located approximately between km zero and km 0.4, km 5.5 and km 5.8, and km 11.7 and km 12.9 (measured from the intersection with the Mine Access Road), located adjacent to the freshwater supply pipeline within the pipeline cleared ROW.
3. Overhead power distribution line and step down transformers within the pipeline cleared ROW.
4. Up to four booster pump stations within up to 50 m by 50 m cleared areas.
5. Land-based water intake and pumping system within an up to 100 m by 100 m cleared area.
6. Clear-span bridges indicated as Bridges A, B, C, D, and E.
7. Temperature and flow control system.

8. Equipment and material laydown areas located within the cleared pipeline ROW.
9. Borrow areas within the cleared ROW.

2.3 AIRSTRIP AND ACCESS ROAD (FIGURE A1-5)

1. An up to 100 m wide and 1826 m long cleared ROW that includes an up to 30 m wide and up to 1706 m long gravel runway, up to 8 m wide graded areas on each side of the runway, up to 60 m long graded areas on each end of the runway including:
 - a. Taxiway, aircraft parking apron and terminal building.
 - b. Emergency electrical generator, communication antennae, weather station, aircraft fuel storage, navigational aids and lighting, and emergency response equipment.
 - c. A helicopter pad within the cleared area.
 - d. Equipment and material laydown areas.
2. An up to six km long access road from the Mine Access Road to the airstrip using up to 5.5 km of upgraded existing roads and up to 0.5 km of new road located within an up to 10 m wide cleared ROW, including:
 - a. Gate(s) controlling access to the airstrip.
 - b. One clear-span bridge indicated as Bridge F.
 - c. Equipment and material laydown areas within the cleared ROW.
 - d. Borrow areas within the cleared ROW.

2.4 KLUSKUS-OOTSA FSR REALIGNMENT (FIGURE A1-6)

1. Realignment of up to 2 km of the Kluskus-Ootsa FSR between km 104 and km 107 within an up to 30 m cleared ROW.
2. Equipment and material laydown areas within the cleared ROW of the realignment.
3. Borrow areas within the cleared ROW of the realignment.

2.5 MINE ACCESS ROAD (FIGURES A1-7A TO A1-7D)

1. An up to 10 m wide two-lane road originating at about km 124.5 on the Kluskus-Ootsa FSR and terminating at the plant site, constructed within an up to 20 m cleared wide ROW.
2. Clear span bridges indicated as Bridges G, H, I, J, and K.
3. Gate(s) controlling access to the mine site.
4. Equipment and material laydown areas within the Mine Access Road cleared ROW.
5. Borrow areas within the cleared ROW.

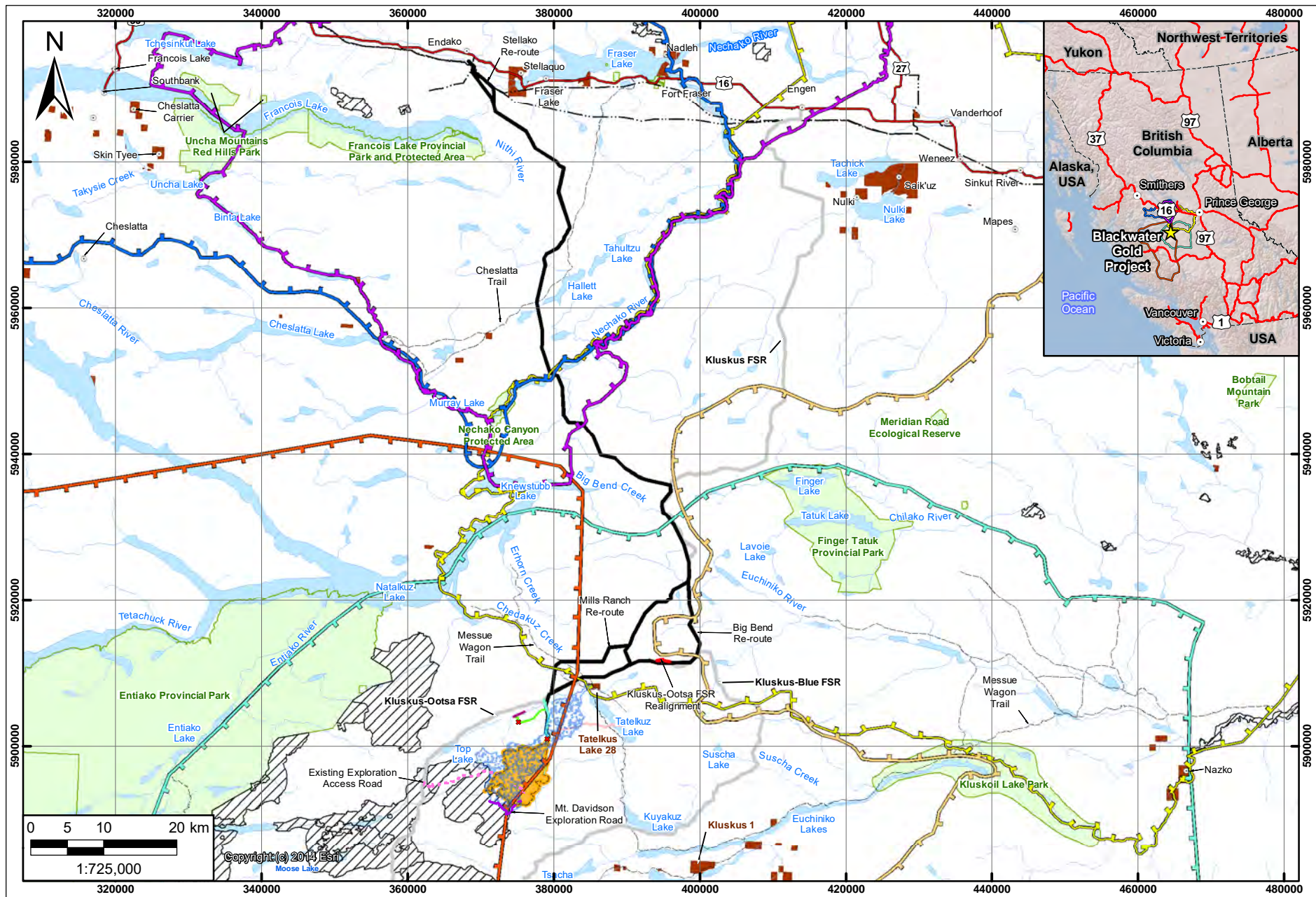
2.6 MINE ACCESS ROUTES (FIGURES A1-1, A1-5, AND A1-7A TO A1-7D)

1. Kluskus FSR and Kluskus-Ootsa FSR.
2. Airstrip access road.
3. Mine Access Road.

2.7 ELECTRICAL TRANSMISSION LINE (FIGURES A2-1 TO A2-35)

1. An up to 140 m wide corridor containing a 230 kV transmission line originating at BC Hydro's Glenannan Substation near Endako and connecting to the electrical substation at the plant site. The transmission line must be constructed within an up to 40 m wide cleared ROW for standard spans, and within an up to 50 m cleared ROW for long spans. The transmission line area covers up to 700 hectares, assuming a 50 m cleared ROW for the entire length and using the longest combination of re-route options.
2. Where a portion of the transmission line corridor has an alternative routing option (Stellako Re-route, Big Bend Re-route, Mills Ranch Re-route), only one of the transmission line corridor or alternative routing option may be built, and not both. The sections of the transmission line corridor for which an alternative routing option may be selected are in Figures A2-2, A2-3, A2-21, A2-22, A2-23, A2-24, A2-25, A2-29, A2-30, A2-31, and A2-32. The alternative routing options (Re-routes) are in Figures A2-2, A2-3, A2-21, A2-24, A2-25, A2-26, A2-27, A2-28, A2-29, A2-30, A2-31, and A2-32.
3. Access roads and stream crossings within the transmission line cleared ROW.
4. Equipment and material laydown areas within the cleared ROW.
5. Borrow areas within the cleared ROW.

Certified Project Description Mapbook
Appendix A1



- | | | | |
|---|---|--|--|
| <ul style="list-style-type: none"> Lhoosk'uz Dene Nation¹ Ulkatcho First Nation¹ Nadleh Whut'en² Saikuz First Nation² Stella'en First Nation² Nazko First Nation³ | <ul style="list-style-type: none"> Community Highway Forest Service Road Trail Existing Transmission Line Ungulate Winter Range | <ul style="list-style-type: none"> Parks and Protected Areas Indian Reserve Gate Mine Site Freshwater Supply System Airstrip | <ul style="list-style-type: none"> Airstrip Access Road Mine Access Road Transmission Line Corridor Kluskus-Ootsa FSR Realignment Existing Exploration Access Road Mt. Davidson Exploration Road Davidson Creek Watershed |
|---|---|--|--|

Blackwater Gold Project PROJECT OVERVIEW

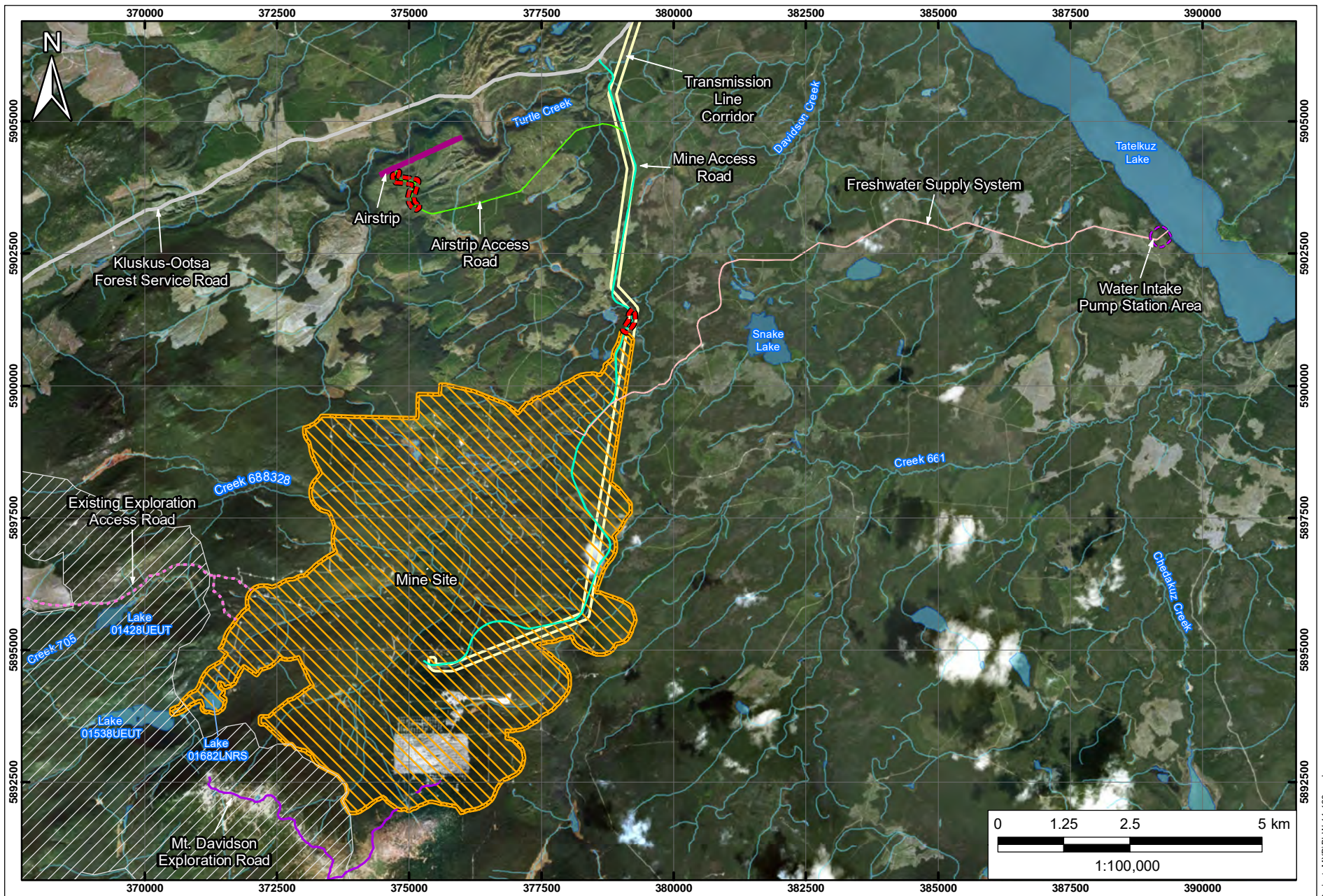
Date : April 18, 2019
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Produced By: ERM

Projection: Transverse Mercator
Datum: North American 1983

Figure No.:
A1-1

¹ Source: Carrier Chilcotin Tribal Council - <http://www.carrierchilcotin.org/>
² Source: Carrier Sekani Tribal Council - <http://www.carriersekani.ca/>
³ Source: BC Treaty Commission Statement of Intent Boundaries - <https://catalogue.data.gov.bc.ca/dataset/first-nation-statement-of-intent-boundaries-bc>

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- | | | |
|--------------------------|----------------------------------|-------------------------------|
| Gate | Airstrip Access Road | Mt. Davidson Exploration Road |
| Mine Footprint | Mine Access Road | Ungulate Winter Range |
| Mine Site | Transmission Line Corridor | |
| Freshwater Supply System | Water Intake Pump Station Area | |
| Airstrip | Existing Exploration Access Road | |

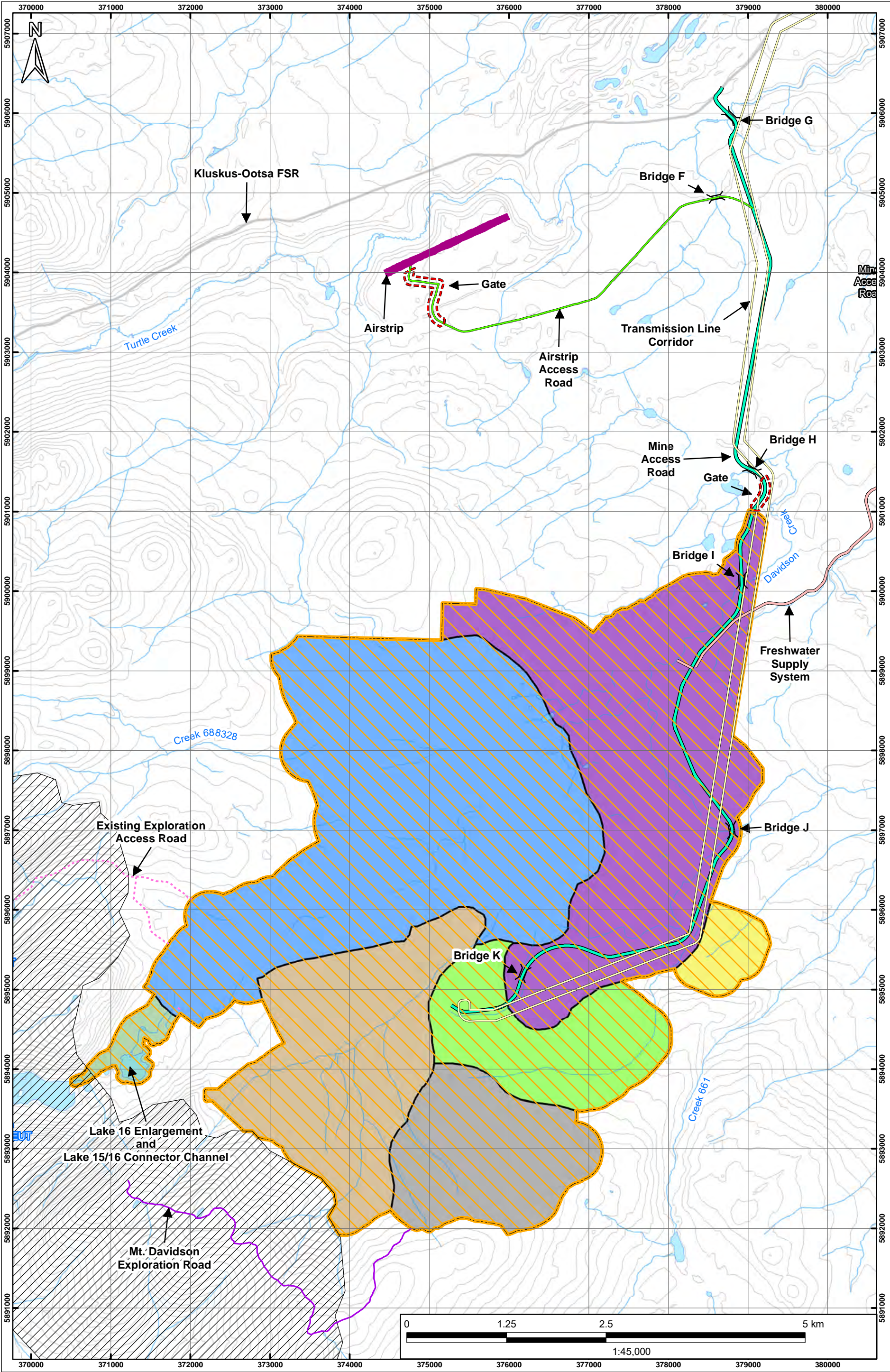
Blackwater Gold Project
MINE SITE, FRESHWATER SUPPLY SYSTEM,
AIRSTRIP AND AIRSTRIP ACCESS ROAD

Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community
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Date : April 03, 2019
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 Produced By: ERM

Projection: Transverse Mercator
 Datum: North American 1983

Figure No.:
A1-2



Gate	Airstrip	Open Pit	Existing Exploration Access Road (To be decommissioned)
Mine Site	Transmission Line Corridor	TSF Site C and Site D	Mt. Davidson Exploration Road (To be decommissioned)
Airstrip Access Road	Lake 16 Enlargement and Lake 15/16 Connector Channel	TSF Seepage Collection System	Ungulate Winter Range
Mine Access Road	Main Construction and Operations Camps	Waste Rock and Low Grade Stockpiles	
Freshwater Supply System		Plant Site	

Blackwater Gold Project

MINE SITE LAYOUT

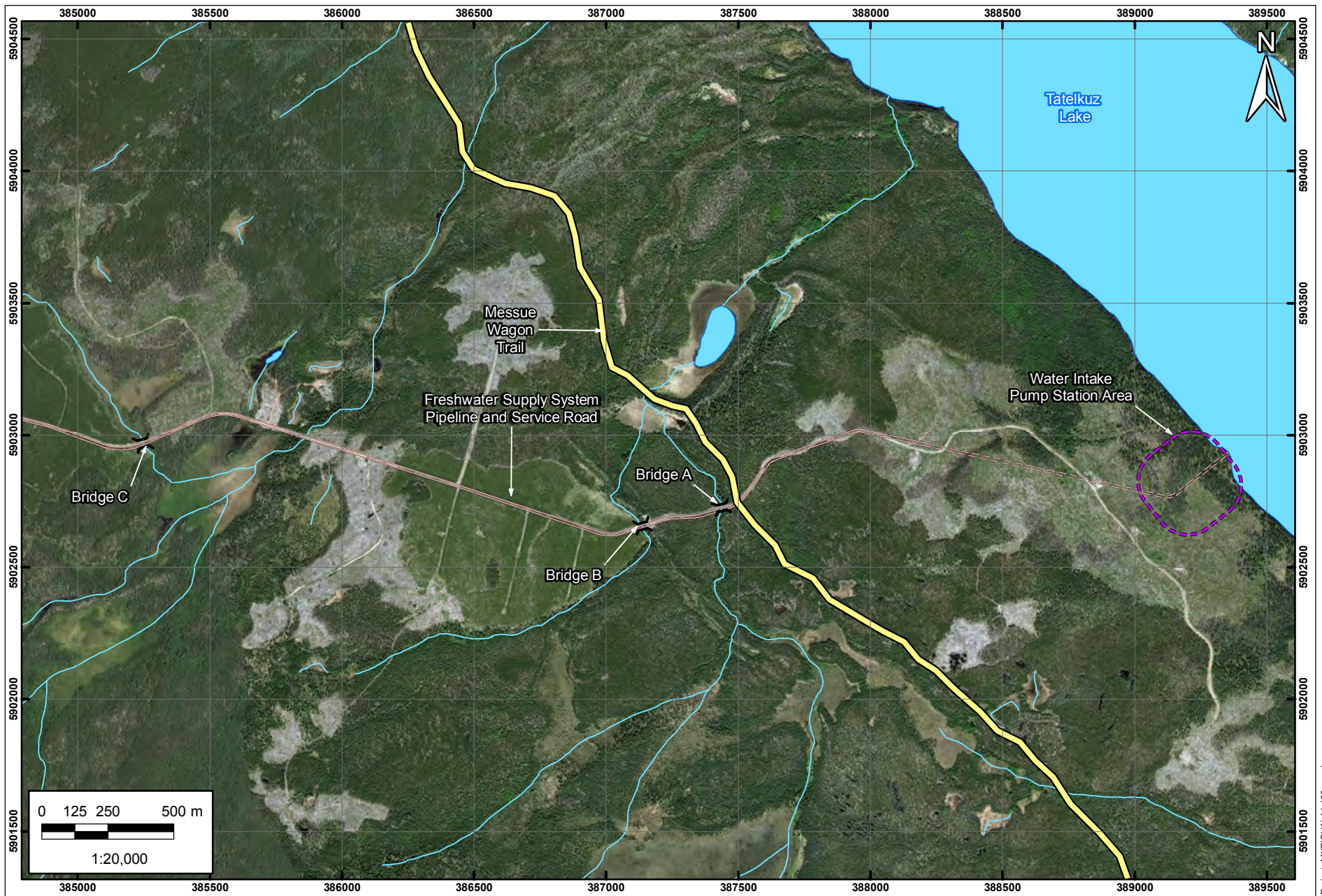
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Date : April 26, 2019
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Produced By: L. Powell

Projection: Transverse Mercator
Datum: North American 1983

Figure No.:
A1-3

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- Freshwater Supply System Pipeline and Existing Service Road
- Freshwater Supply System Pipeline and New Service Road
- Water Intake Pump Station Area
- Trail

Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community
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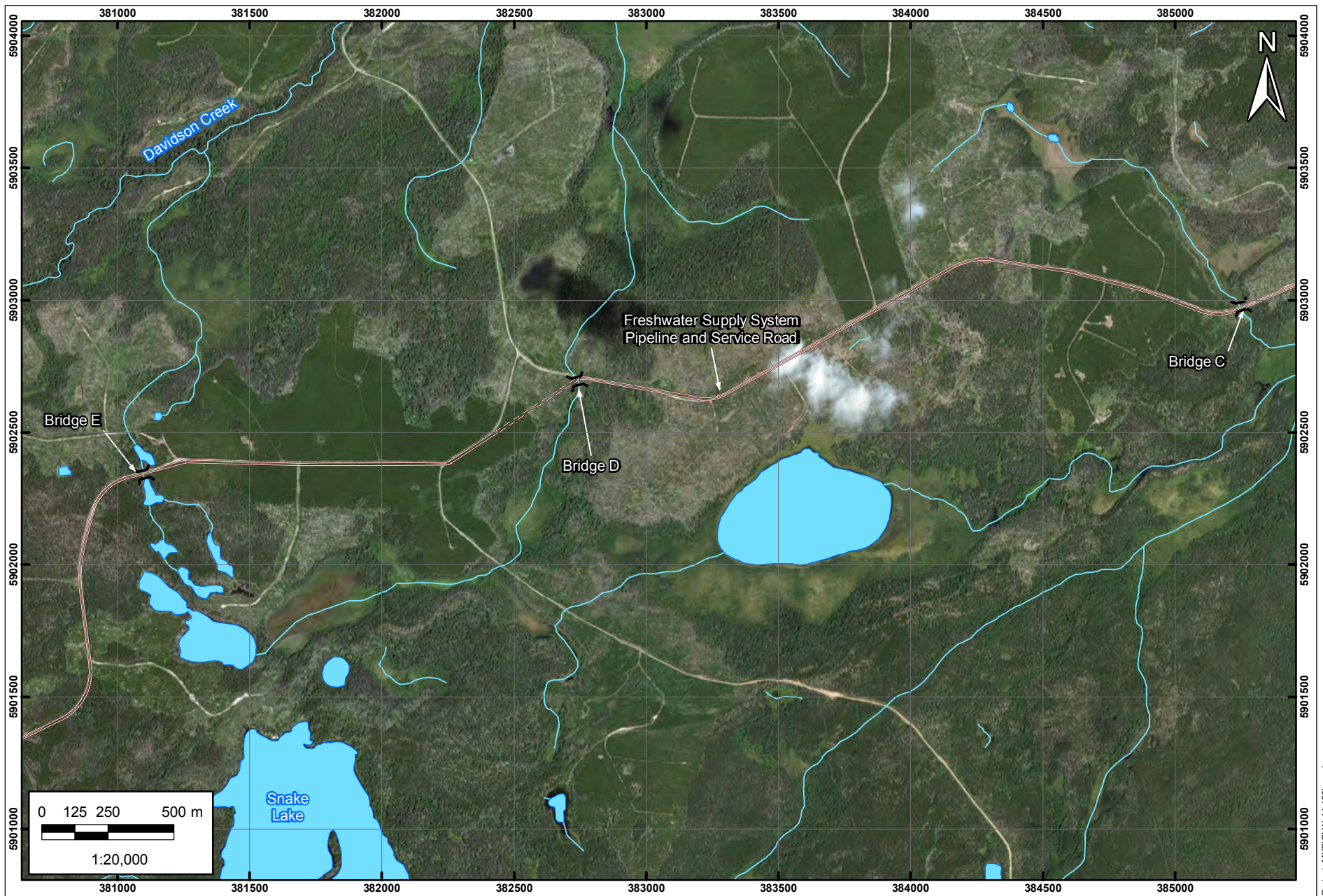
Blackwater Gold Project

FRESHWATER SUPPLY SYSTEM

Date : March 05, 2019
GIS No.: BLW-14-130a
Produced By: ERM

Projection: Transverse Mercator
Datum: North American 1983

Figure No.:
A1-4A



- Freshwater Supply System Pipeline and Existing Service Road
- Freshwater Supply System Pipeline and New Service Road

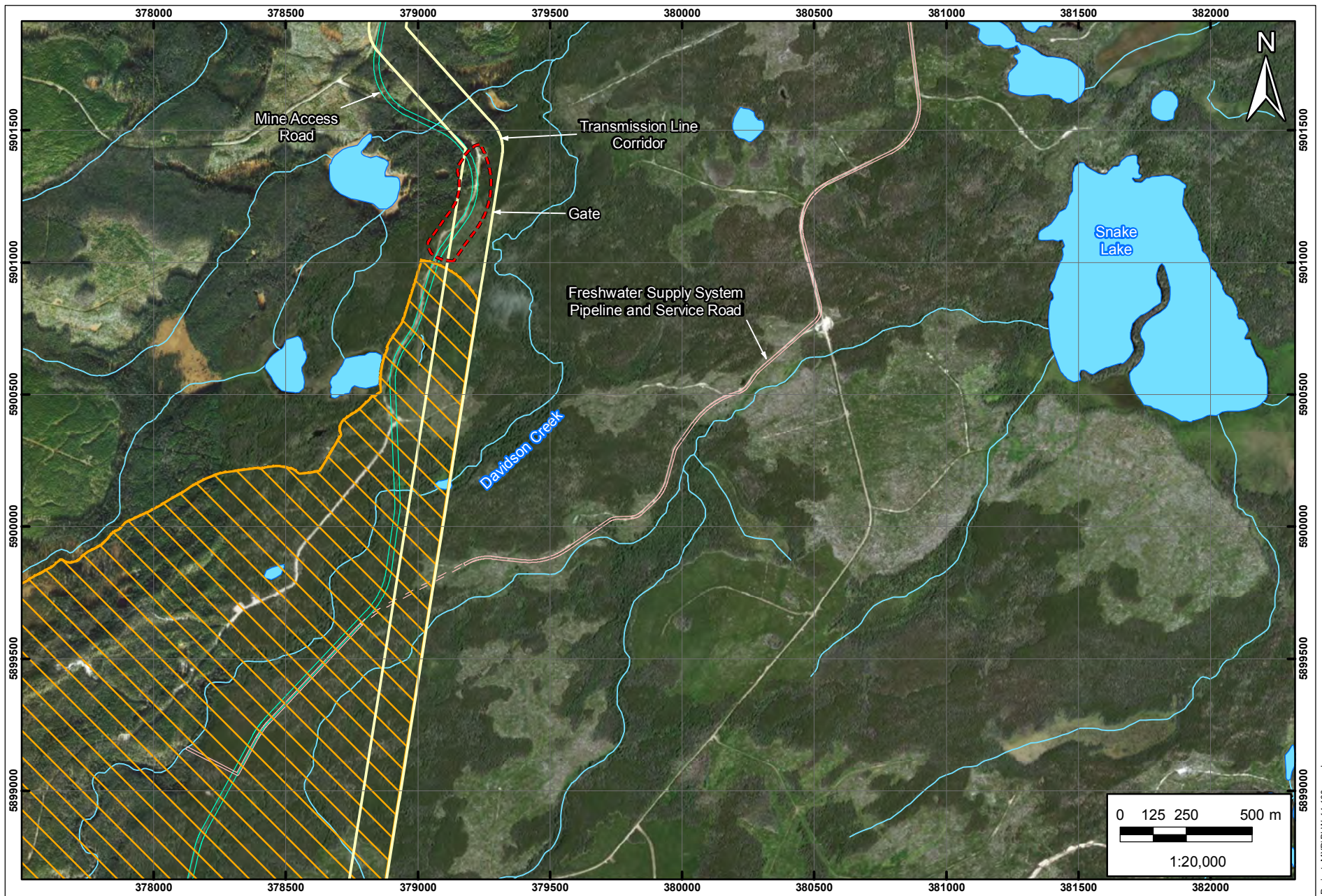
Blackwater Gold Project FRESHWATER SUPPLY SYSTEM

Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community
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Date : March 05, 2019
GIS No.: BLW-14-130b
Produced By: ERM

Projection: Transverse Mercator
Datum: North American 1983

Figure No.:
A1-4B



- Gate
- Transmission Line Corridor
- Freshwater Supply System Pipeline and Existing Service Road
- Freshwater Supply System Pipeline and New Service Road
- Mine Access Road
- Mine Site

Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community
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Date : March 05, 2019
GIS No.: BLW-14-130c
Produced By: ERM

Projection: Transverse Mercator
Datum: North American 1983

Figure No.:
A1-4C



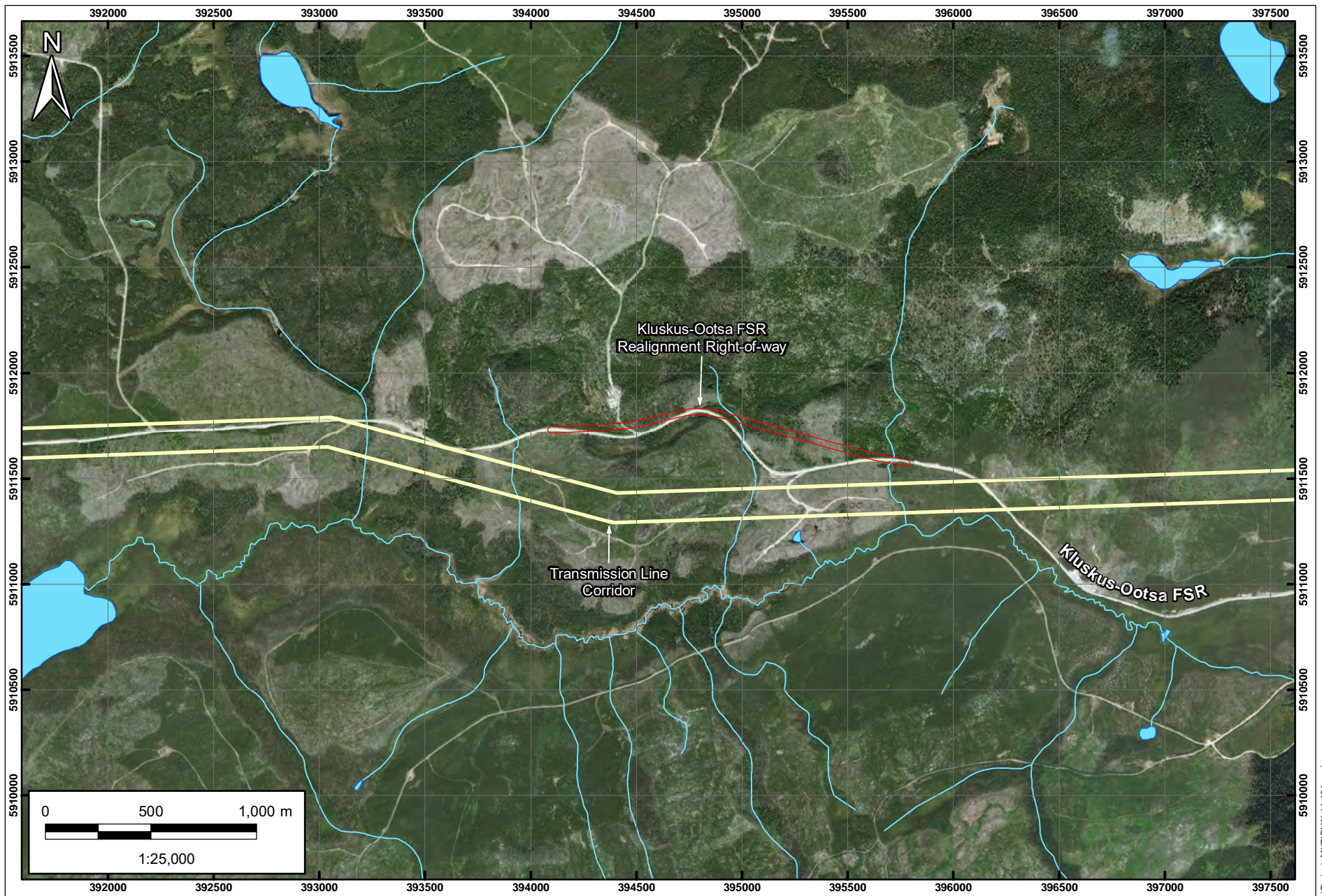
- Gate
- Airstrip Access Road (Existing)
- Airstrip Access Road (New)
- Airstrip
- Mine Access Road
- Transmission Line Corridor

Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community
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Date : March 12, 2019
GIS No.: BLW-14-129
Produced By: ERM

Projection: Transverse Mercator
Datum: North American 1983

Figure No.:
A1-5



- Transmission Line Corridor
- Kluskus-Ootsa FSR Realignment Right-of-way

Blackwater Gold Project

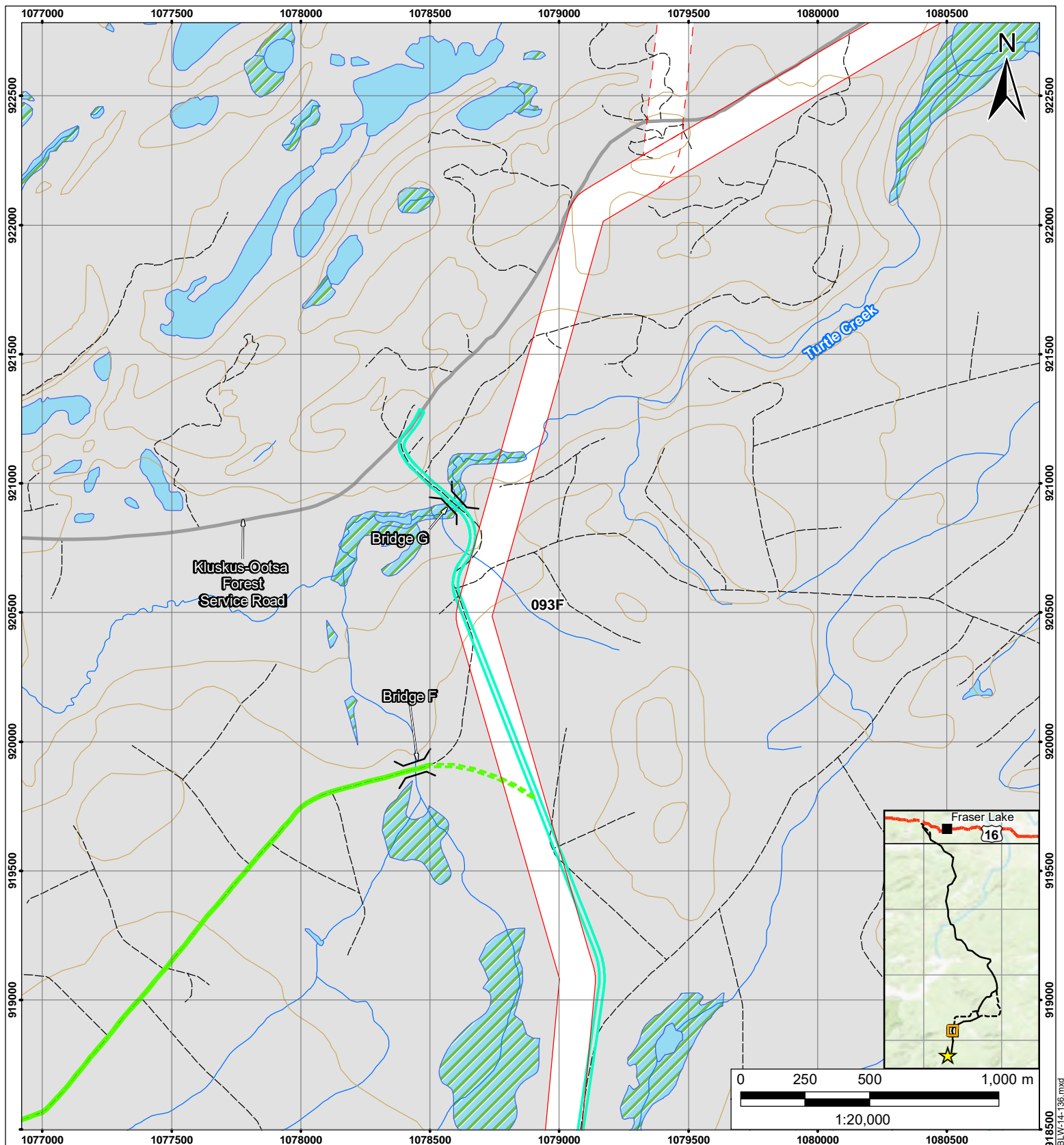
KLUSKUS-OOTSA FOREST SERVICE ROAD REALIGNMENT

Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community
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Date : April 17, 2019
GIS No.: BLW-14-131
Produced By: ERM

Projection: Transverse Mercator
Datum: North American 1983

Figure No.:
A1-6



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|---------------------------------|---|-----------------------------|
| ★ Mine Site | Freshwater Supply System Pipeline and Existing Service Road | — Forest Service Road |
| Gate | Freshwater Supply System Pipeline and New Service Road | - - - Resource Road |
| Mine Access Road | Transmission Line Corridor | — Stream / River |
| Airstrip Access Road - Existing | Main Route | — Contour (100 ft Interval) |
| Airstrip Access Road - New | Re-route | Waterbody |
| | | Wetland |
| | | Mine Site |

Blackwater Gold Project

MINE ACCESS ROAD

MAPBOOK

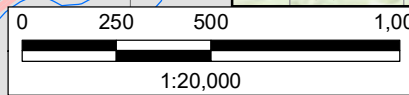
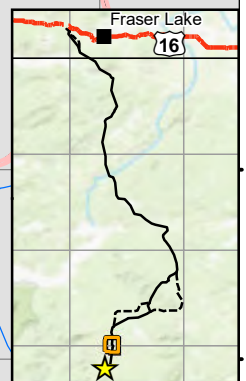
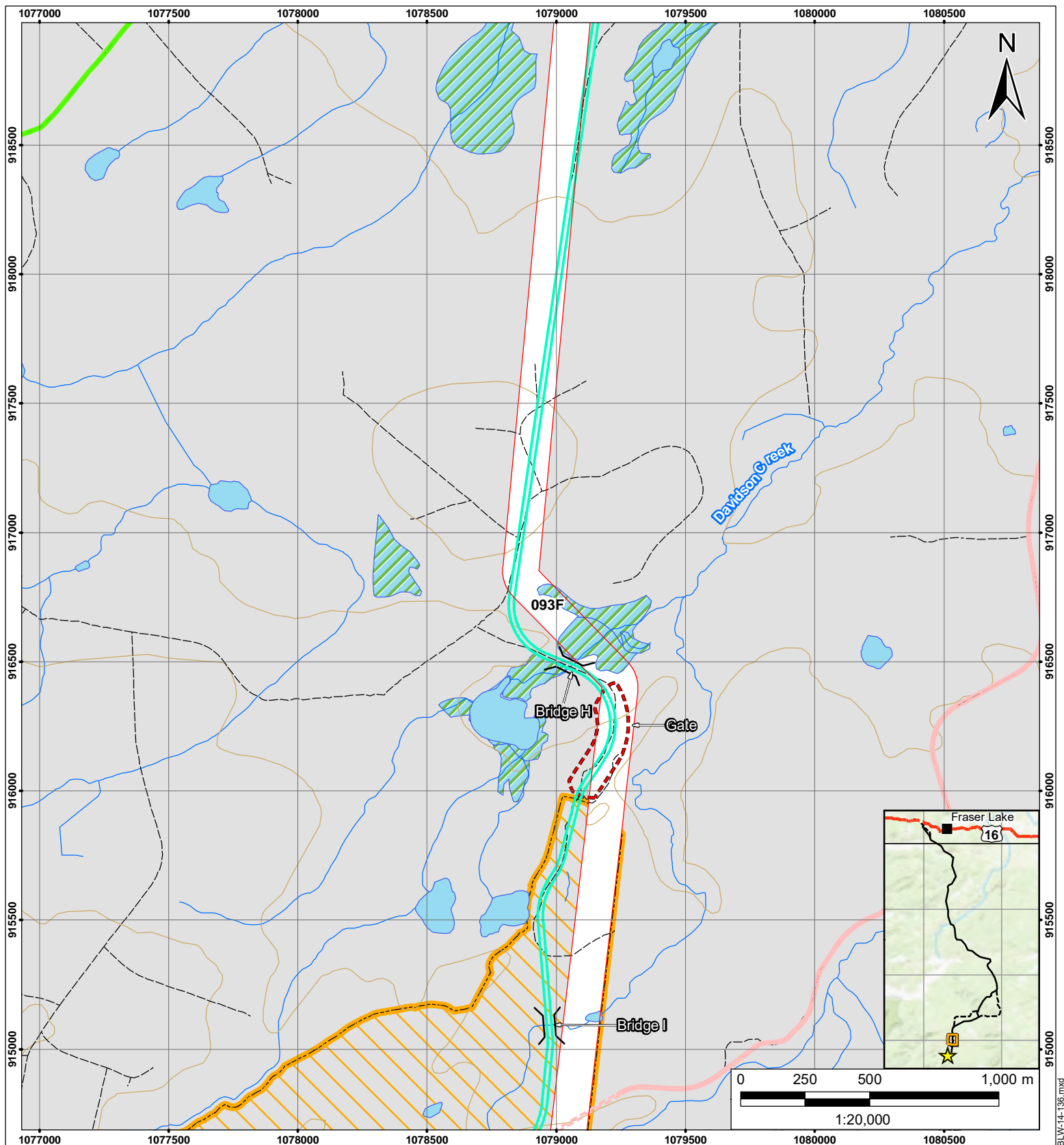
Sources: Esri, HERE, Garmin, Intermap, increment P Corp., GEBCO, USGS, FAO, NPS, NRCAN, GeoBase, IGN, Kadaster NL, Ordnance Survey, Esri Japan, METI, Esri China (Hong Kong), swisstopo, © OpenStreetMap contributors, and the GIS User Community. Contains information licensed under the Open Government Licence – British Columbia

Date : March 12, 2019
GIS No.: BLW-14-136a
Drawn By: ERM

Projection: Albers
Datum: North American 1983

Figure No.:
A1-7A

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| <ul style="list-style-type: none"> ★ Mine Site Gate Mine Access Road Airstrip Access Road - Existing Airstrip Access Road - New | <ul style="list-style-type: none"> Freshwater Supply Pipeline and Existing Service Road Freshwater Supply Pipeline and New Service Road Transmission Line Corridor <ul style="list-style-type: none"> Main Route Re-route | <ul style="list-style-type: none"> Forest Service Road Resource Road Stream / River Contour (100 ft Interval) Waterbody Wetland Mine Site |
|--|--|--|

Blackwater Gold Project MINE ACCESS ROAD MAPBOOK

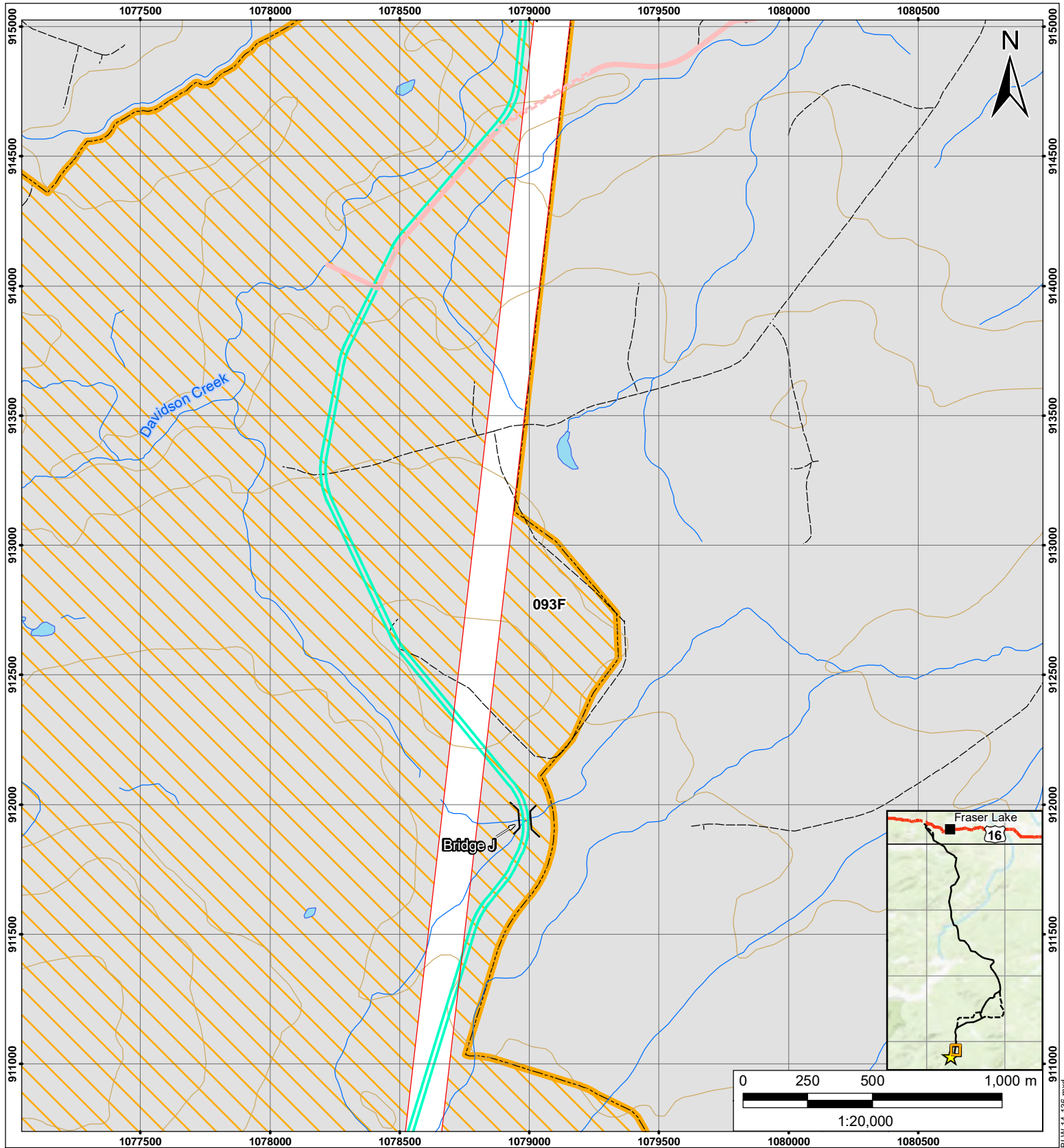
Sources: Esri, HERE, Garmin, Intermap, increment P Corp., GEBCO, USGS, FAO, NPS, NRCAN, GeoBase, IGN, Kadaster NL, Ordnance Survey, Esri Japan, METI, Esri China (Hong Kong), swisstopo, © OpenStreetMap contributors, and the GIS User Community. Contains information licensed under the Open Government Licence – British Columbia

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GIS No.: BLW-14-136b
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Projection: Albers
Datum: North American 1983

Figure No.:
A1-7B

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|---------------------------------|---|-----------------------------|
| ★ Mine Site | Freshwater Supply System Pipeline and Existing Service Road | — Forest Service Road |
| Gate | Freshwater Supply System Pipeline and New Service Road | --- Resource Road |
| Mine Access Road | Transmission Line Corridor | — Stream / River |
| Airstrip Access Road - Existing | Main Route | — Contour (100 ft Interval) |
| Airstrip Access Road - New | Re-route | Waterbody |
| | | Wetland |
| | | Mine Site |

Blackwater Gold Project

MINE ACCESS ROAD

MAPBOOK

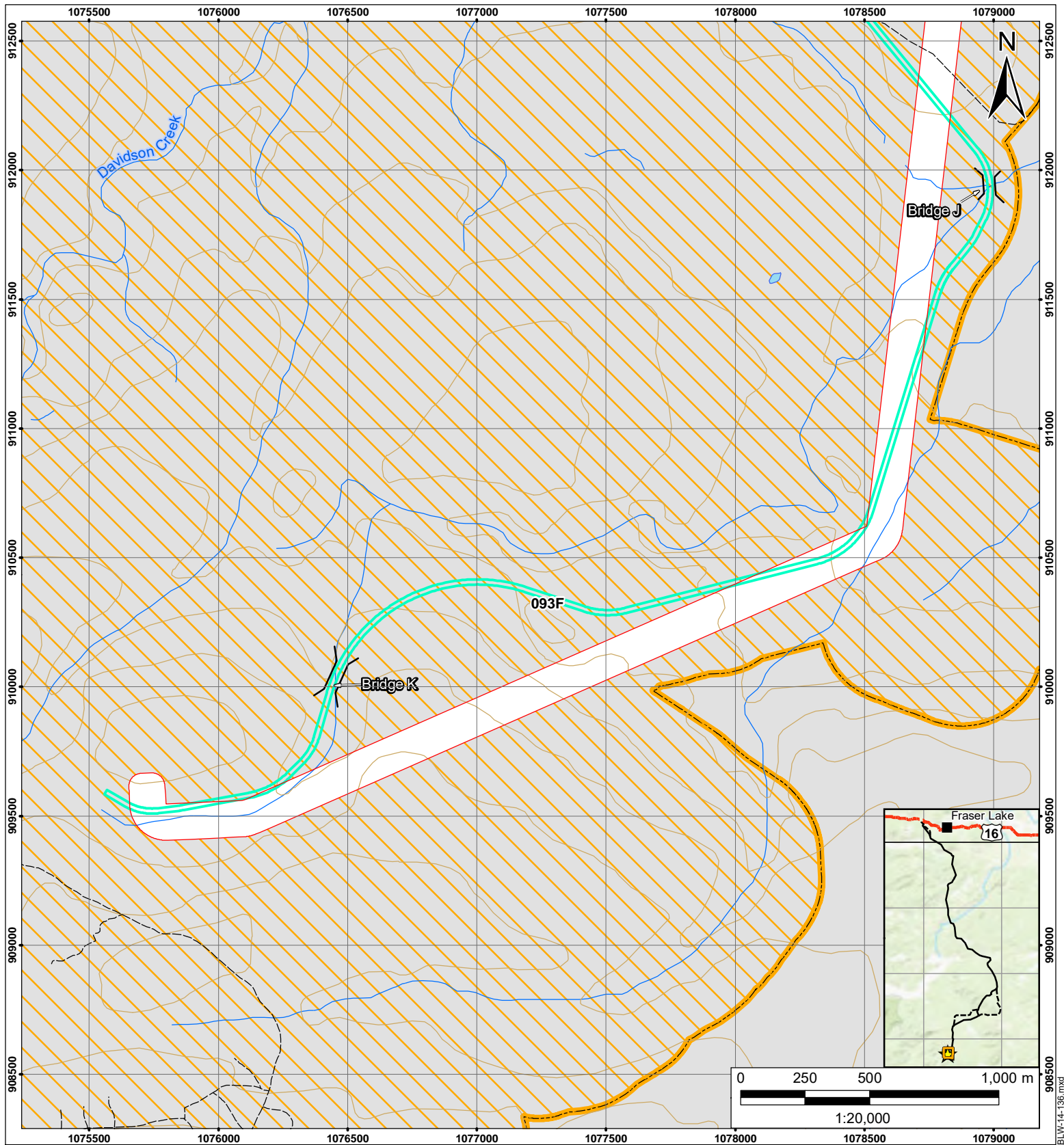
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GIS No.: BLW-14-136c
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Projection: Albers
Datum: North American 1983

Figure No.:
A1-7C

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| ★ Mine Site | Freshwater Supply System
Pipeline and Existing Service Road | — Forest Service Road |
| Gate | Freshwater Supply System
Pipeline and New Service Road | - - - Resource Road |
| Mine Access Road | Transmission Line Corridor | — Stream / River |
| Airstrip Access Road - Existing | Main Route | — Contour (100 ft Interval) |
| Airstrip Access Road - New | Re-route | Waterbody |
| | | Wetland |
| | | Mine Site |

Blackwater Gold Project MINE ACCESS ROAD MAPBOOK

Sources: Esri, HERE, Garmin, Intermap, increment P Corp., GEBCO, USGS, FAO, NPS, NRCAN, GeoBase, IGN, Kadaster NL, Ordnance Survey, Esri Japan, METI, Esri China (Hong Kong), swisstopo, © OpenStreetMap contributors, and the GIS User Community. Contains information licensed under the Open Government Licence – British Columbia

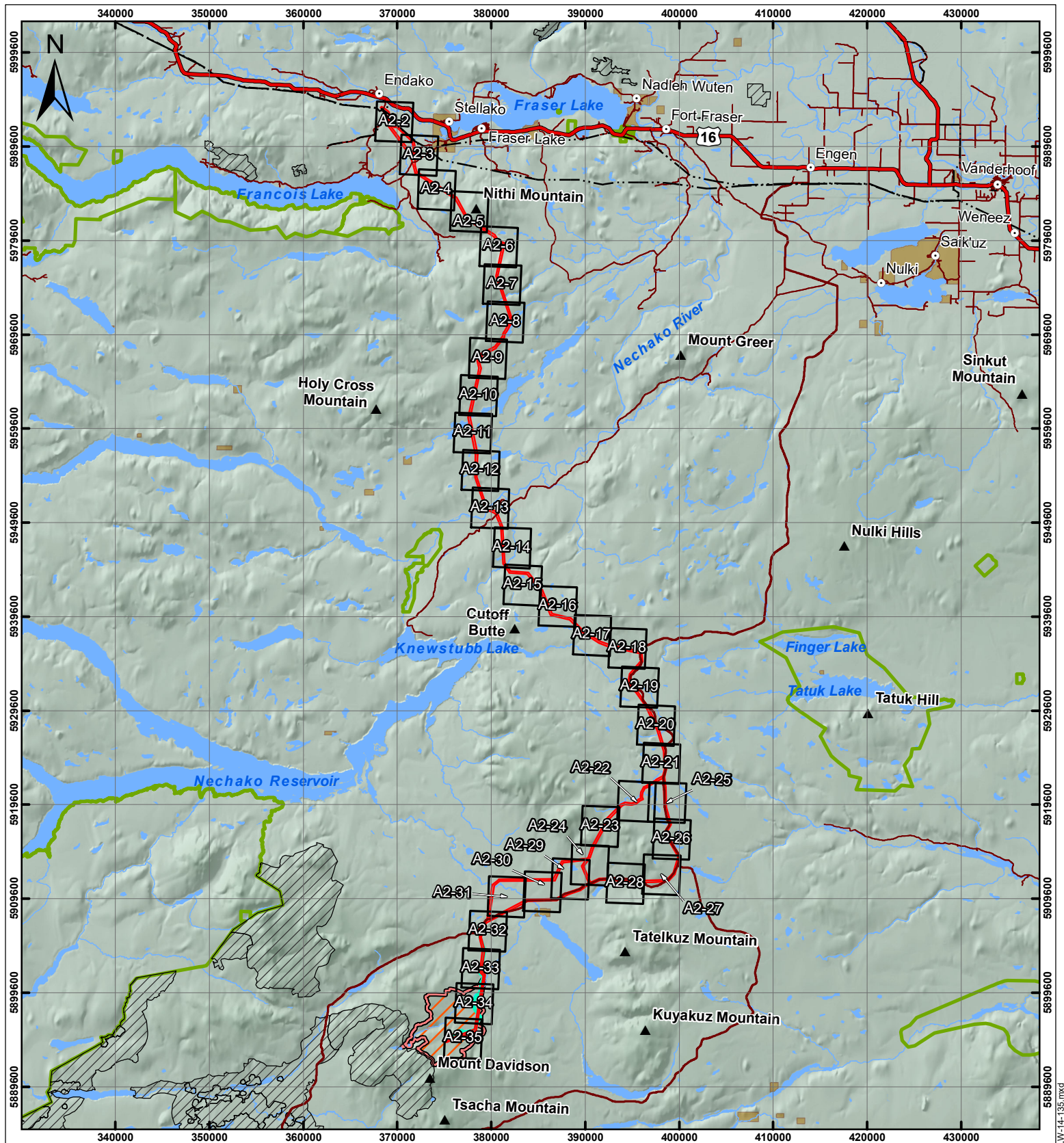
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Drawn By: ERM

Projection: Albers
Datum: North American 1983

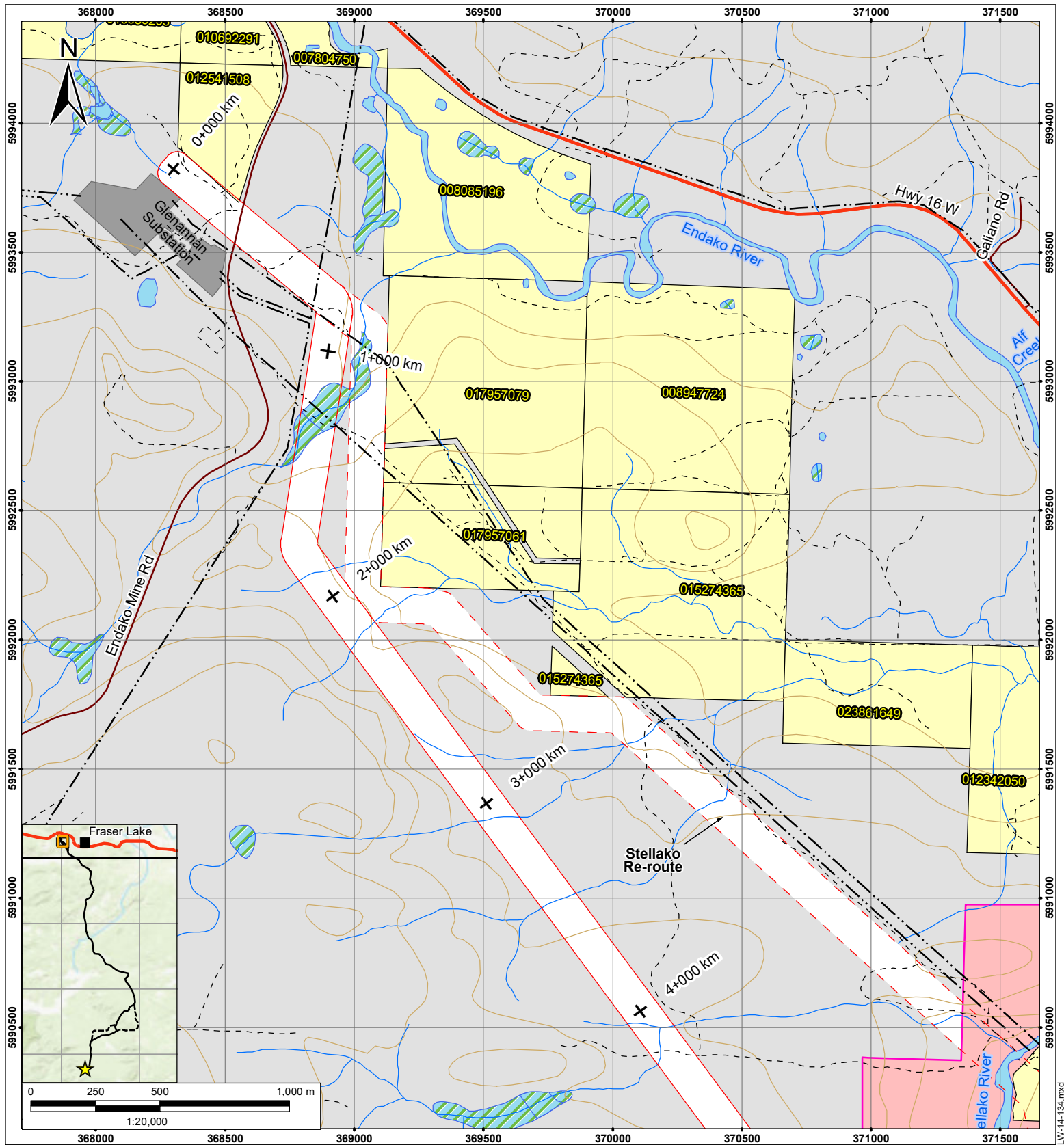
Figure No.:
A1-7D

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Certified Project Description Mapbook
Appendix A2



<ul style="list-style-type: none"> Community Mountain Highway BC Hydro Transmission Line Forest Service Road Other Road Watercourse Waterbody 	<ul style="list-style-type: none"> Ungulate Winter Range Parks and Protected Areas Indian Reserve Transmission Line Corridor Mine Access Road Certified Project Description Map Mine Site 	<p>Blackwater Gold Project</p> <h2>TRANSMISSION LINE MAP INDEX</h2>	
<p>Contains information licensed under the Open Government Licence – British Columbia</p>		<p>Date : May 03, 2019 GIS No.: BLW-14-135 Drawn By: aPettersson</p>	<p>Projection: Transverse Mercator Datum: North American 1983 Checked by: N. Bishop</p>
			<p>Figure No.: A2-1</p>



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| <ul style="list-style-type: none"> ★ Mine Site + Transmission Line Chainage Gate Blue-listed Wetland Wildlife Management Area Existing Transmission Line Highway Road Resource Road Forest Service Road | <ul style="list-style-type: none"> Trail Stream / River 100 ft Contour Waterbody Wetland Private Land Indian Reserve Forest Recreation Site Bridge Mine Site | <ul style="list-style-type: none"> Mine Access Road Airstrip Access Road - Existing Airstrip Access Road - New Freshwater Supply System Pipeline and Existing Service Road Freshwater Supply System Pipeline and New Service Road Transmission Line Corridor <ul style="list-style-type: none"> Main Route Re-route |
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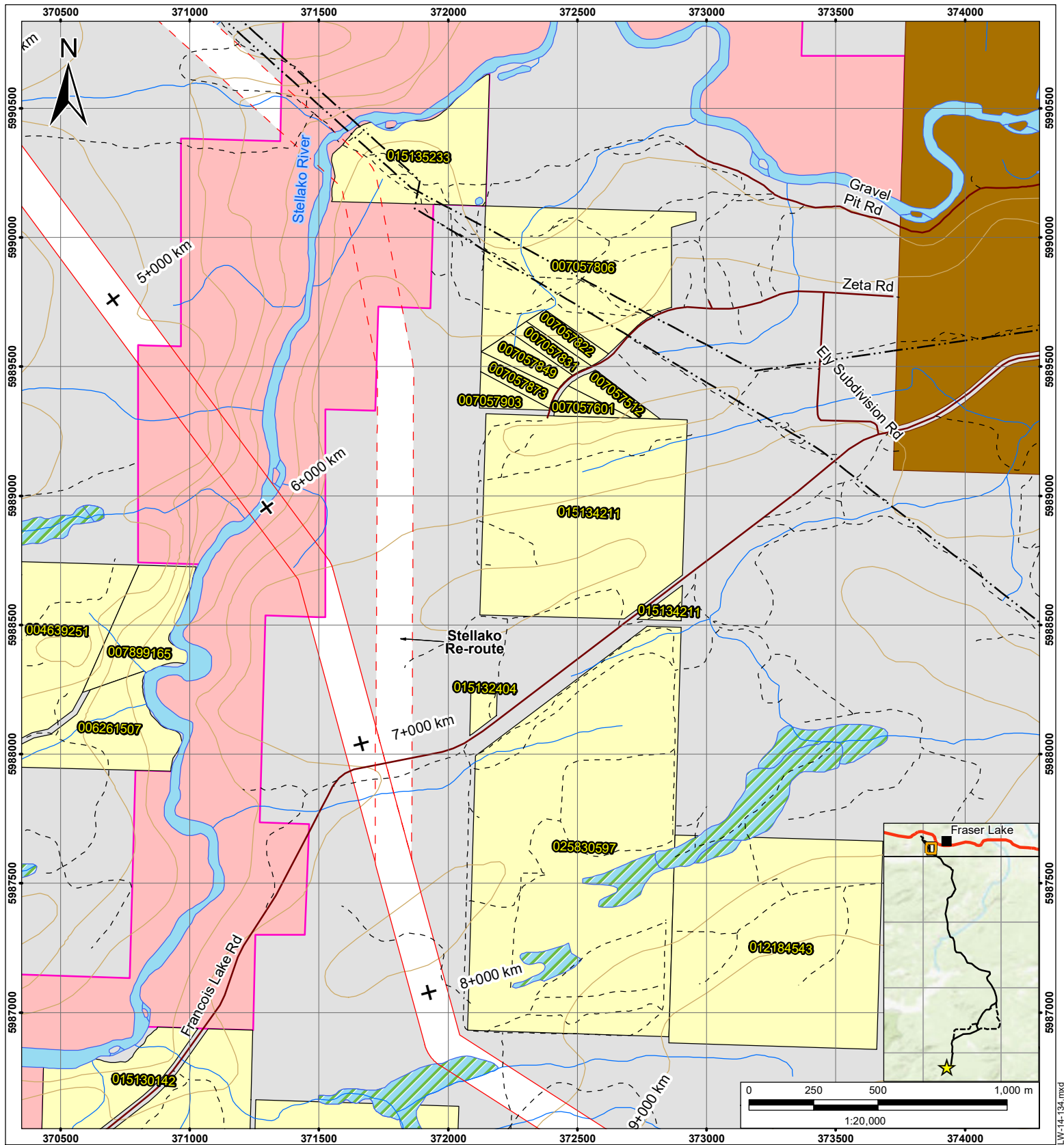
Blackwater Gold Project TRANSMISSION LINE MAPBOOK

Sources: Esri, HERE, Garmin, Intermap, increment P Corp., GEBCO, USGS, FAO, NPS, NRCAN, GeoBase, IGN, Kadaster NL, Ordnance Survey, Esri Japan, METI, Esri China (Hong Kong), swisstopo, © OpenStreetMap contributors, and the GIS User Community. Contains information licensed under the Open Government Licence – British Columbia

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GIS No.: A2-2
Drawn By: L. Powell

Projection: Transverse Mercator
Datum: North American 1983
Checked by: N. Bishop

Figure No.:
A2-2



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| Transmission Line Corridor <ul style="list-style-type: none"> Main Route Re-route | | |

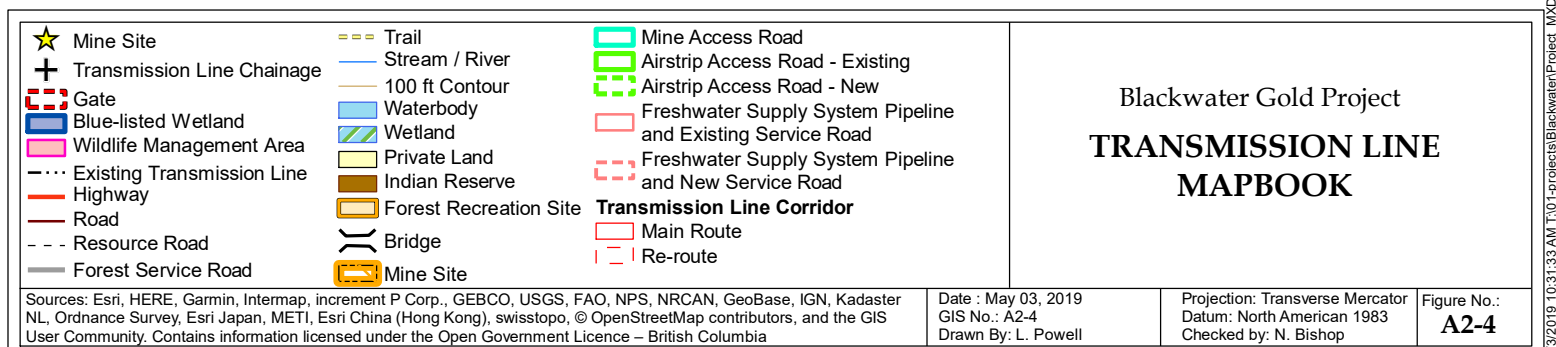
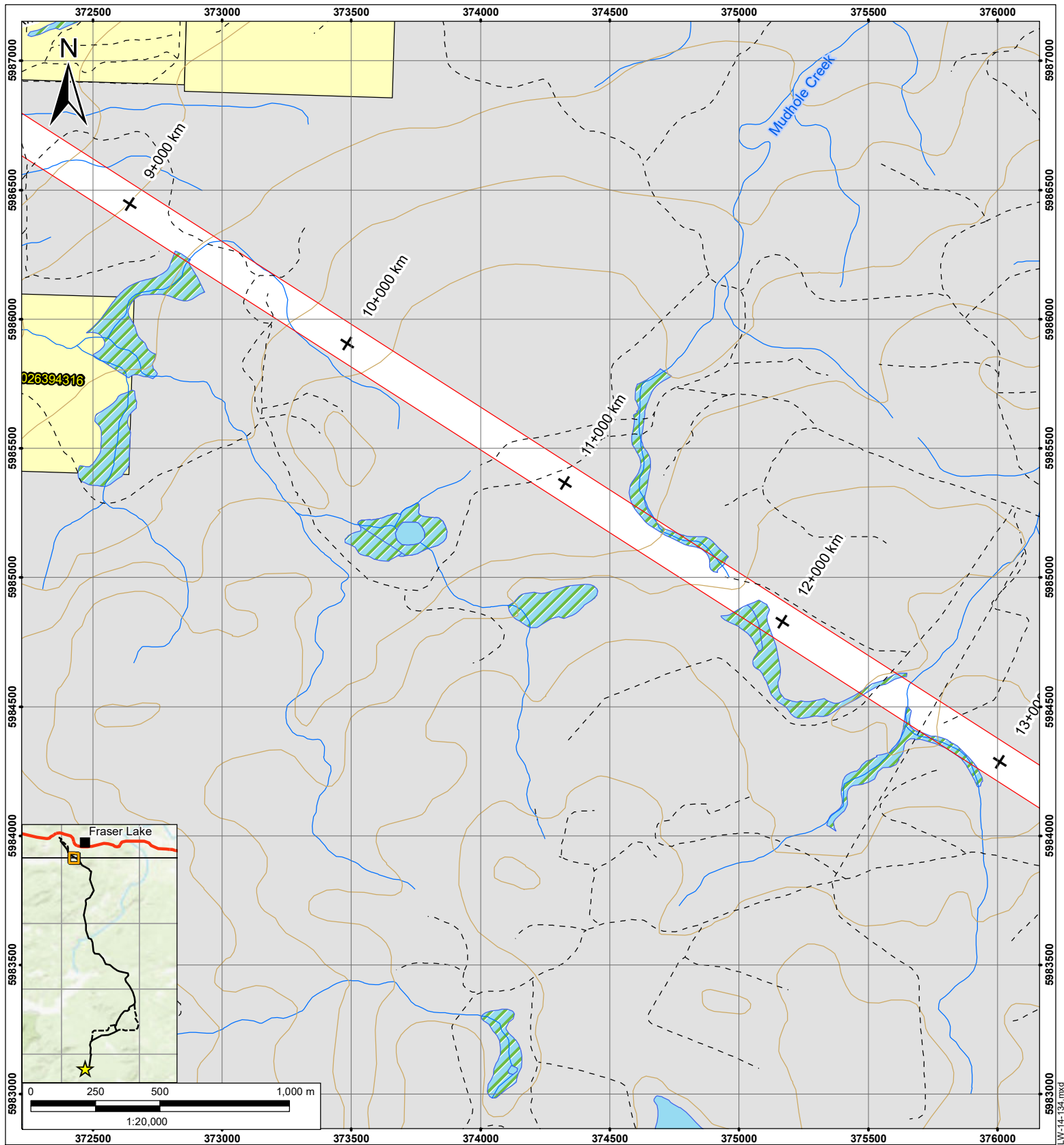
Blackwater Gold Project TRANSMISSION LINE MAPBOOK

Sources: Esri, HERE, Garmin, Intermap, increment P Corp., GEBCO, USGS, FAO, NPS, NRCAN, GeoBase, IGN, Kadaster NL, Ordnance Survey, Esri Japan, METI, Esri China (Hong Kong), swisstopo, © OpenStreetMap contributors, and the GIS User Community. Contains information licensed under the Open Government Licence – British Columbia

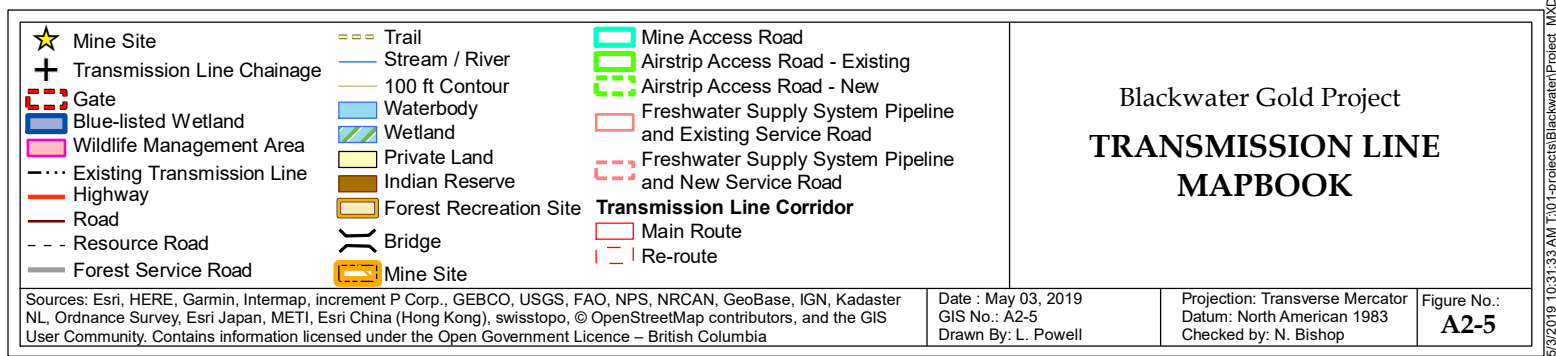
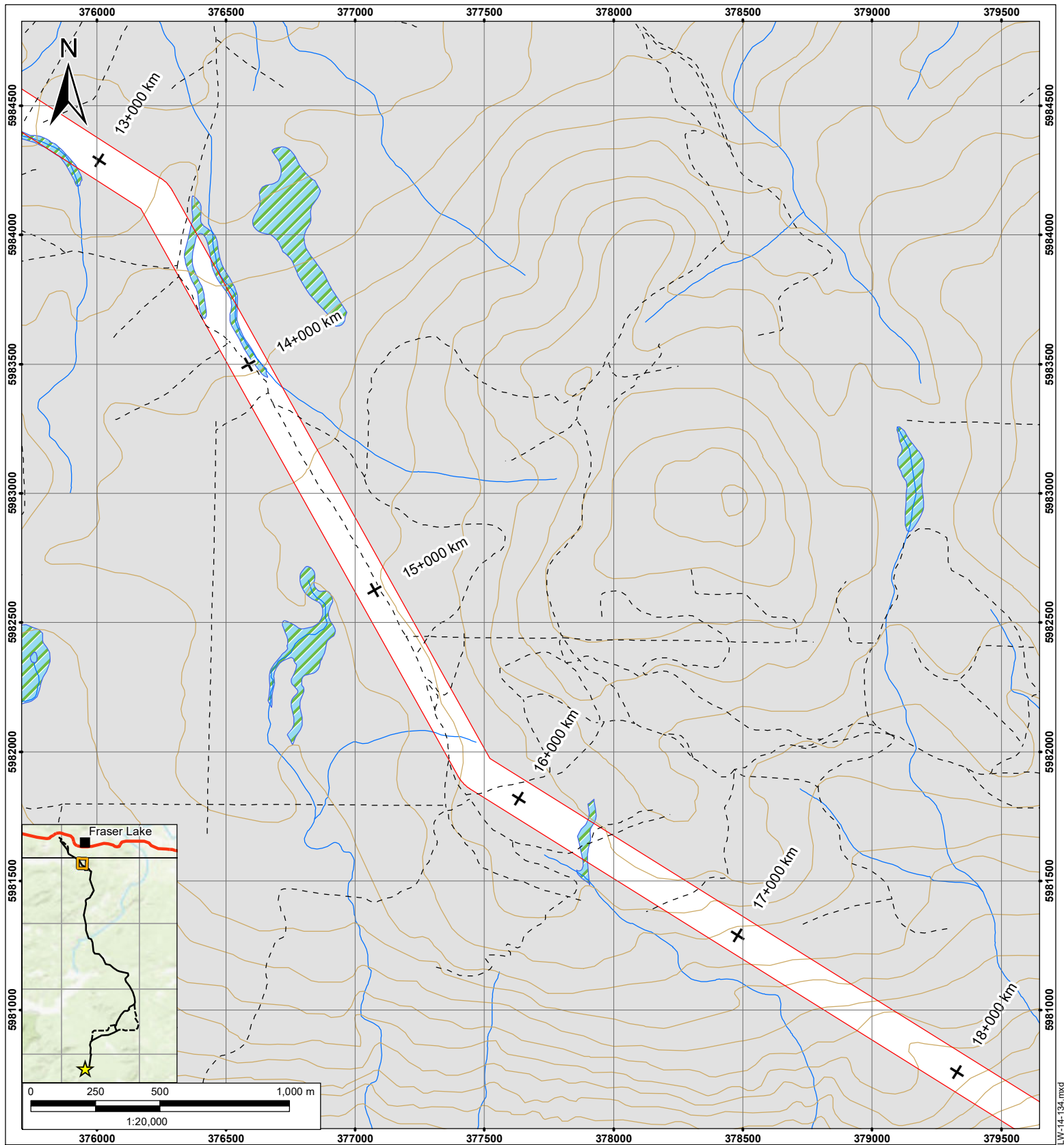
Date : May 03, 2019
GIS No.: A2-3
Drawn By: L. Powell

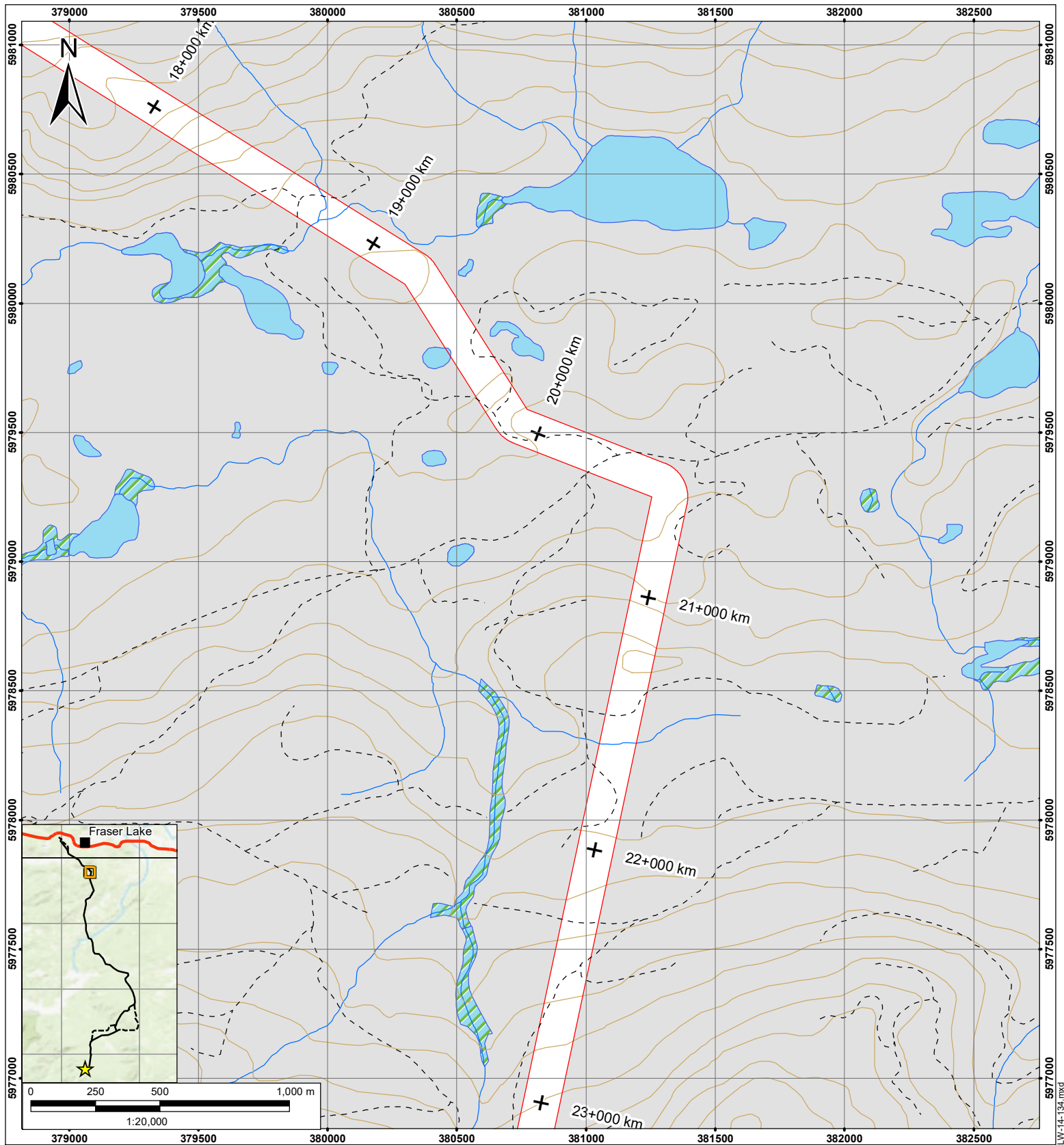
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Datum: North American 1983
Checked by: N. Bishop

Figure No.:
A2-3



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| <ul style="list-style-type: none"> ★ Mine Site ✚ Transmission Line Chainage ⊞ Gate Blue-listed Wetland Wildlife Management Area --- Existing Transmission Line --- Highway --- Road --- Resource Road --- Forest Service Road | <ul style="list-style-type: none"> --- Trail --- Stream / River --- 100 ft Contour Waterbody Wetland Private Land Indian Reserve Forest Recreation Site Bridge Mine Site | <ul style="list-style-type: none"> Mine Access Road Airstrip Access Road - Existing Airstrip Access Road - New Freshwater Supply System Pipeline and Existing Service Road Freshwater Supply System Pipeline and New Service Road Transmission Line Corridor Main Route Re-route |
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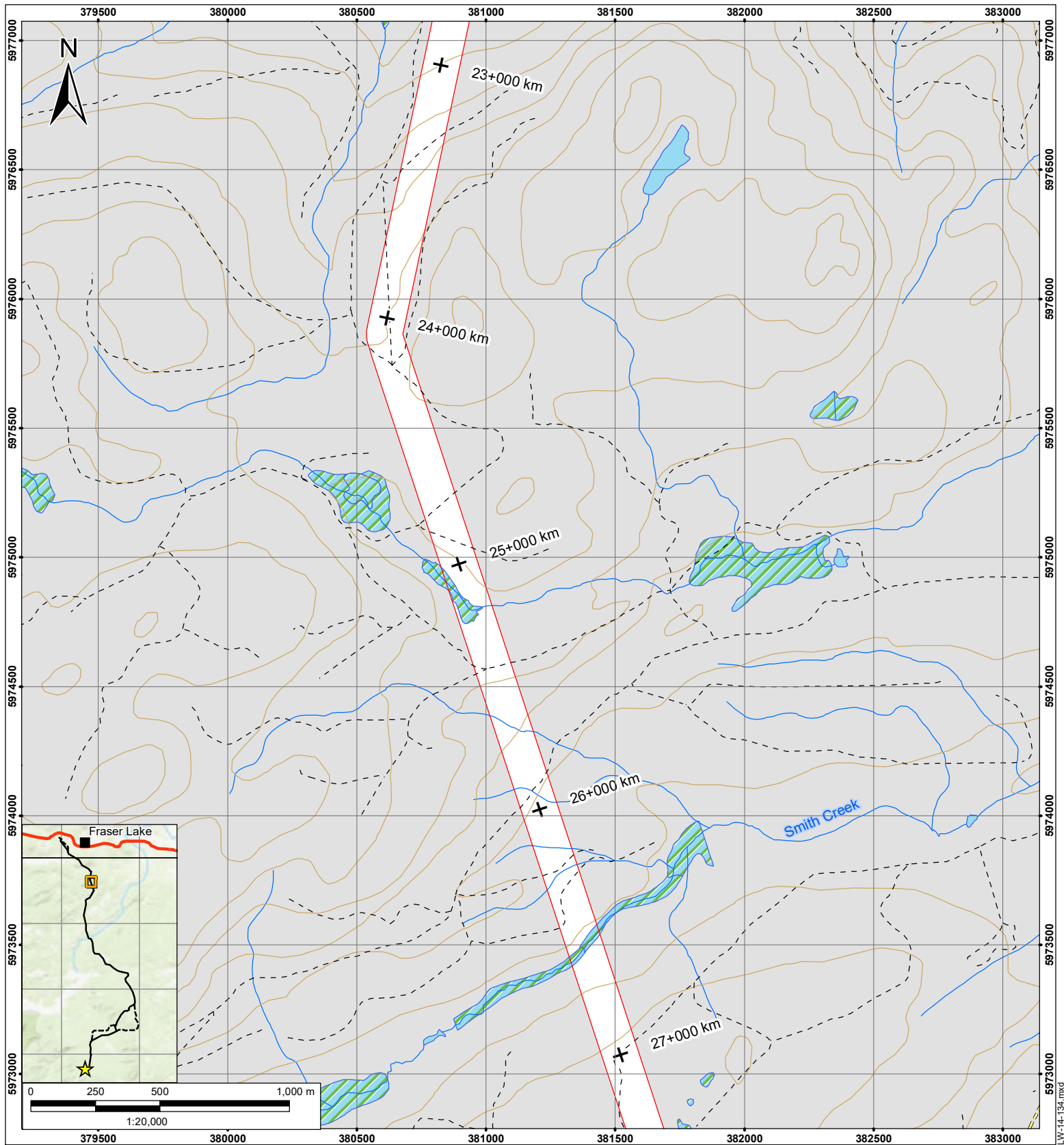
Blackwater Gold Project TRANSMISSION LINE MAPBOOK

Sources: Esri, HERE, Garmin, Intermap, increment P Corp., GEBCO, USGS, FAO, NPS, NRCAN, GeoBase, IGN, Kadaster NL, Ordnance Survey, Esri Japan, METI, Esri China (Hong Kong), swisstopo, © OpenStreetMap contributors, and the GIS User Community. Contains information licensed under the Open Government Licence – British Columbia

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Drawn By: L. Powell

Projection: Transverse Mercator
Datum: North American 1983
Checked by: N. Bishop

Figure No.:
A2-6



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|----------------------------------|--------------------------|---|
| ★ Mine Site | - - - Trail | ▭ Mine Access Road |
| + Transmission Line Chainage | — Stream / River | ▭ Airstrip Access Road - Existing |
| ⊞ Gate | — 100 ft Contour | ▭ Airstrip Access Road - New |
| ▭ Blue-listed Wetland | ▭ Waterbody | ▭ Freshwater Supply System Pipeline and Existing Service Road |
| ▭ Wildlife Management Area | ▭ Wetland | ▭ Freshwater Supply System Pipeline and New Service Road |
| - - - Existing Transmission Line | ▭ Private Land | Transmission Line Corridor |
| — Highway | ▭ Indian Reserve | ▭ Main Route |
| — Road | ▭ Forest Recreation Site | ▭ Re-route |
| - - - Resource Road | — Bridge | |
| — Forest Service Road | ▭ Mine Site | |

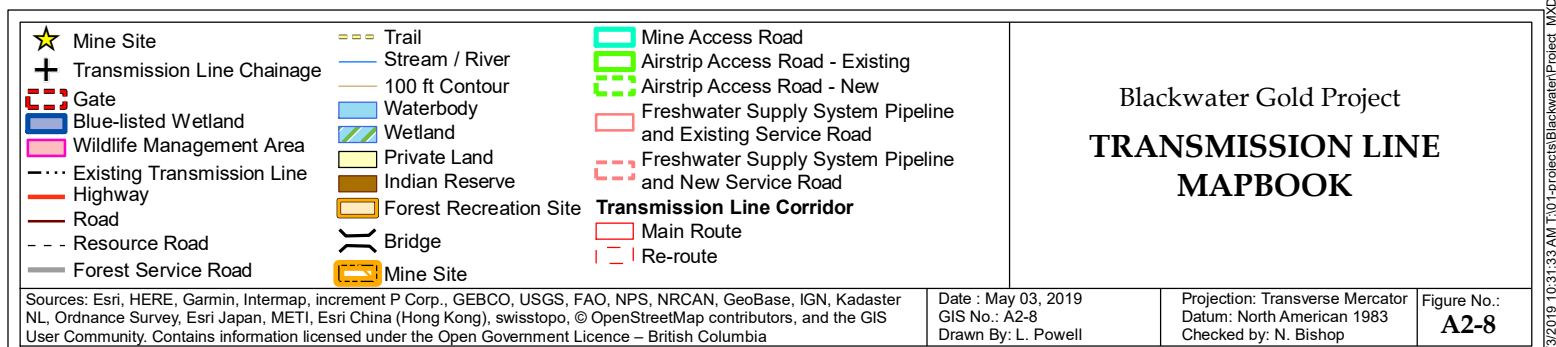
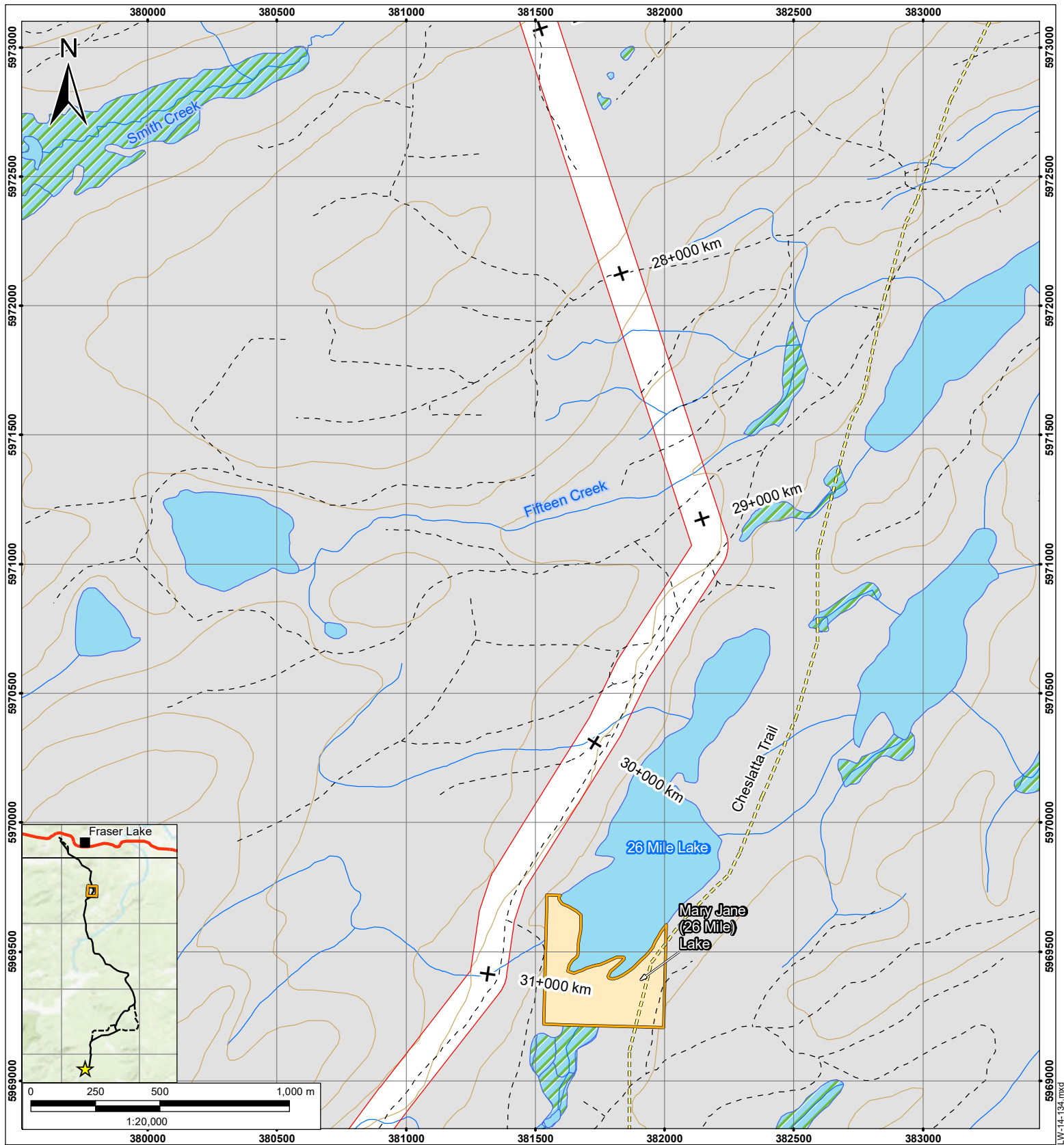
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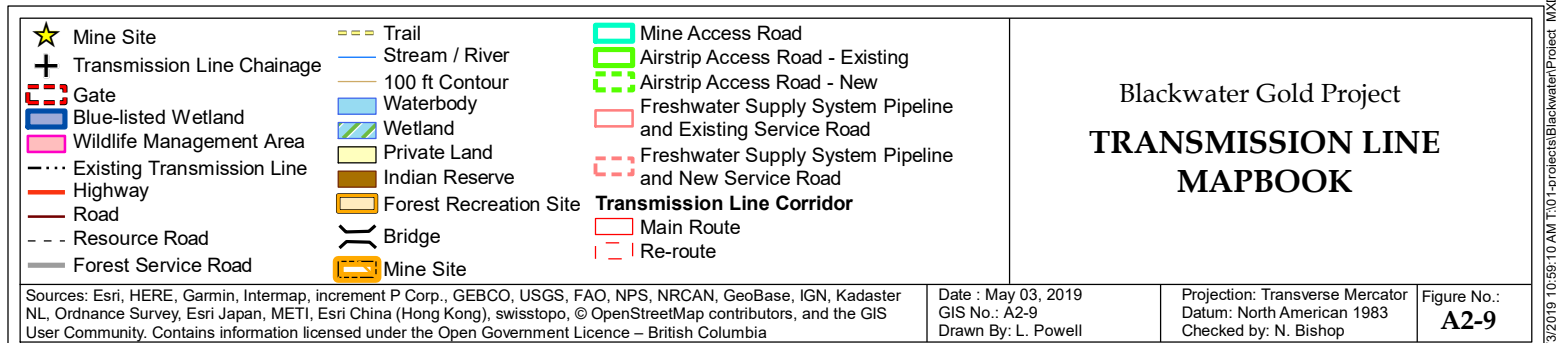
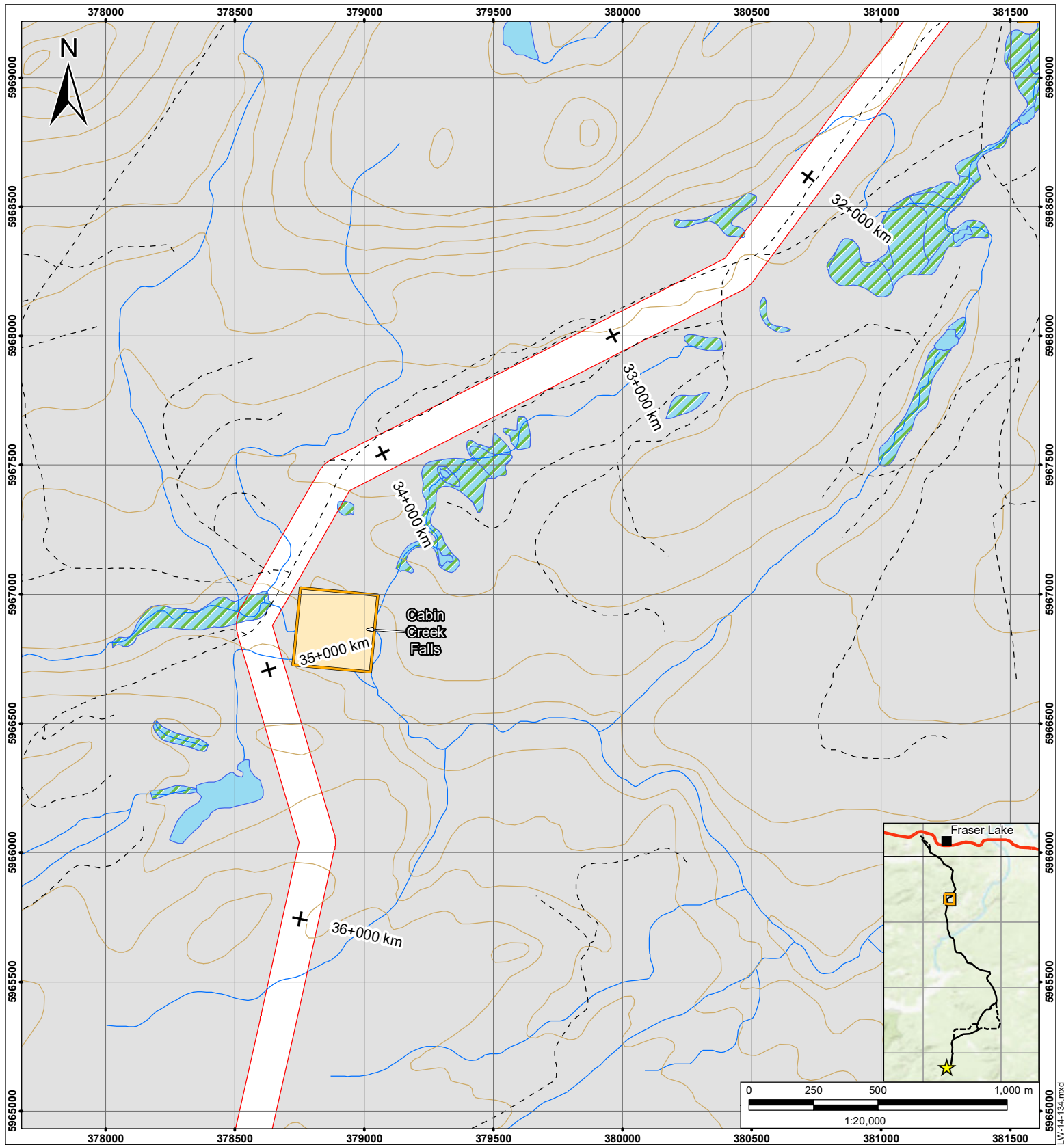
Sources: Esri, HERE, Garmin, Intermap, increment P Corp., GEBCO, USGS, FAO, NPS, NRCAN, GeoBase, IGN, Kadaster NL, Ordnance Survey, Esri Japan, METI, Esri China (Hong Kong), swisstopo, © OpenStreetMap contributors, and the GIS User Community. Contains information licensed under the Open Government Licence – British Columbia

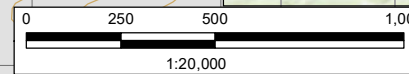
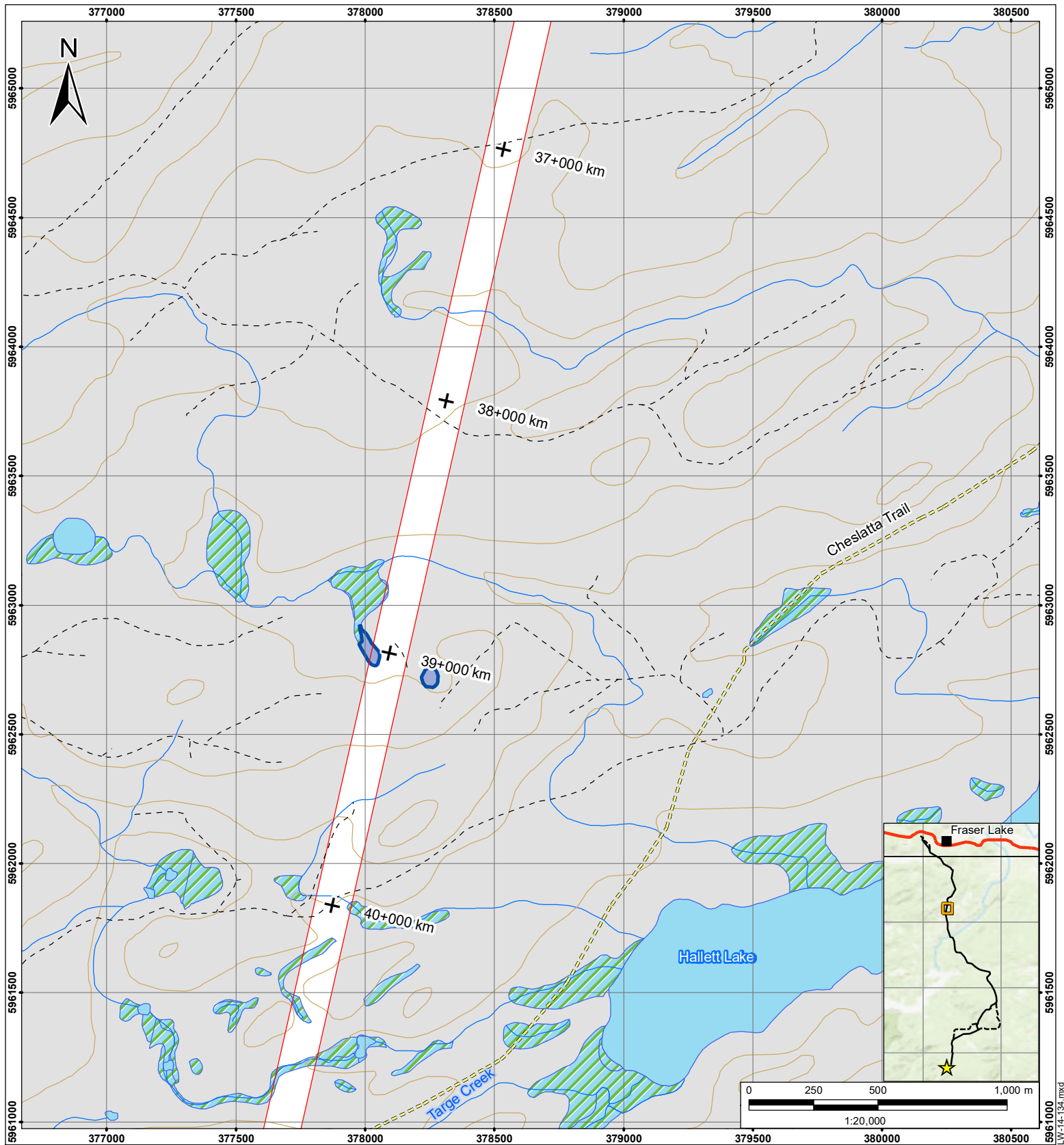
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Drawn By: L. Powell

Projection: Transverse Mercator
Datum: North American 1983
Checked by: N. Bishop

Figure No.:
A2-7







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| <ul style="list-style-type: none"> ★ Mine Site + Transmission Line Chainage Gate Blue-listed Wetland Wildlife Management Area Existing Transmission Line Highway Road Resource Road Forest Service Road | <ul style="list-style-type: none"> Trail Stream / River 100 ft Contour Waterbody Wetland Private Land Indian Reserve Forest Recreation Site Bridge Mine Site | <ul style="list-style-type: none"> Mine Access Road Airstrip Access Road - Existing Airstrip Access Road - New Freshwater Supply System Pipeline and Existing Service Road Freshwater Supply System Pipeline and New Service Road Transmission Line Corridor Main Route Re-route |
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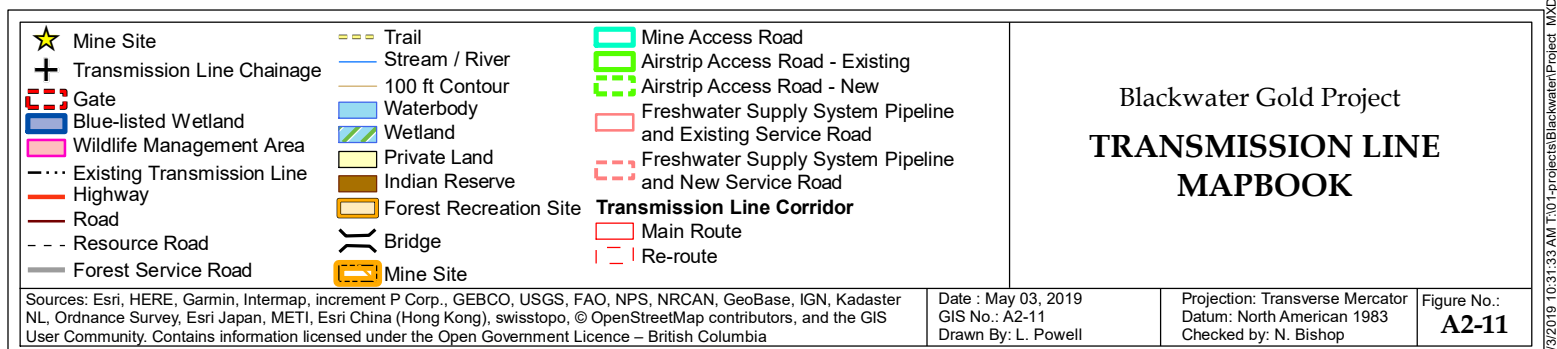
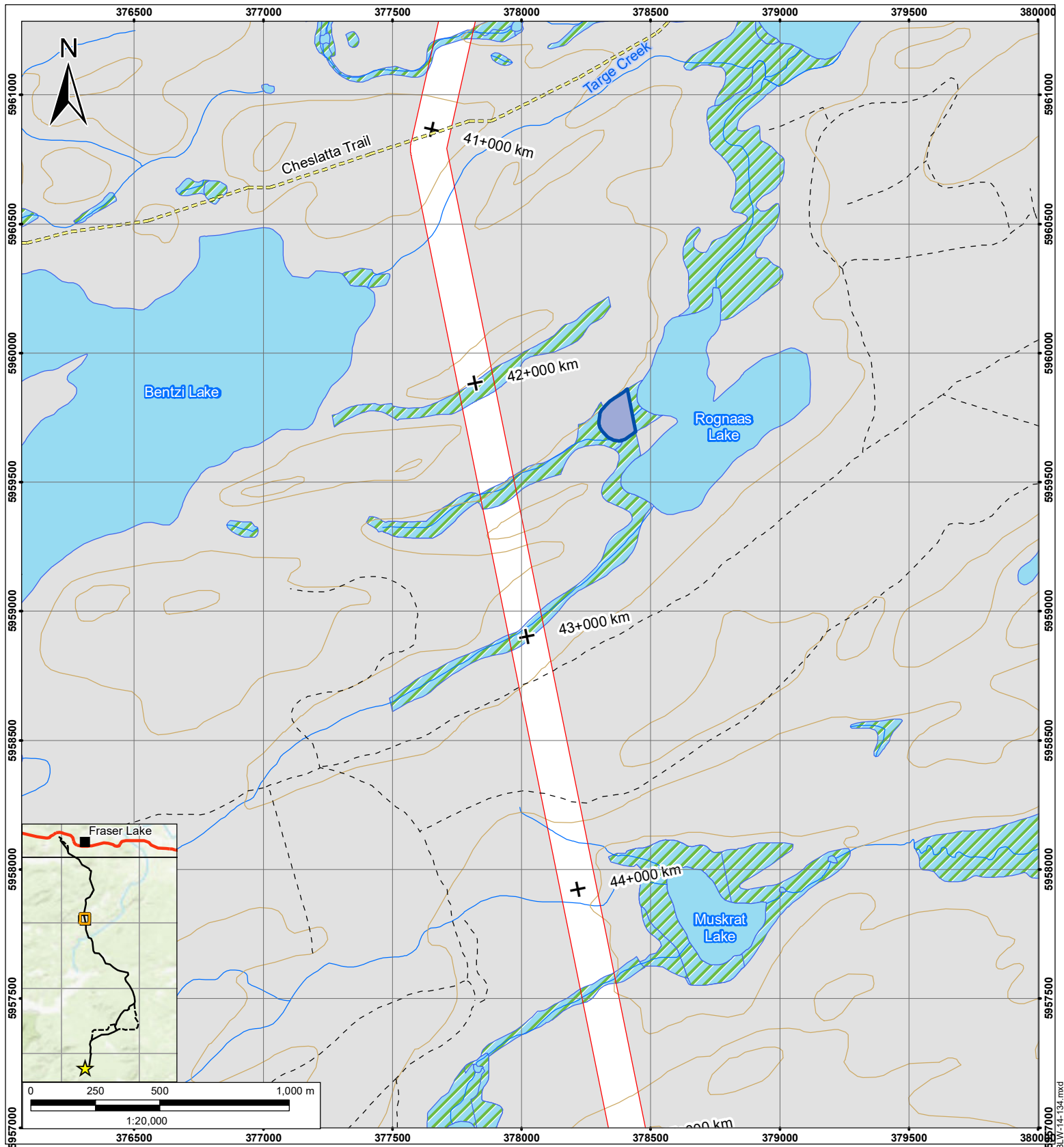
Blackwater Gold Project TRANSMISSION LINE MAPBOOK

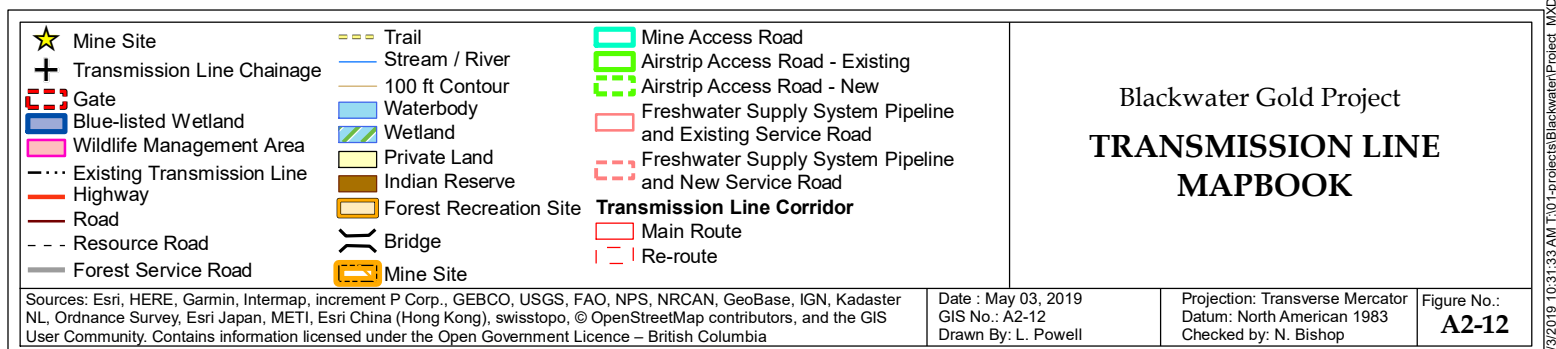
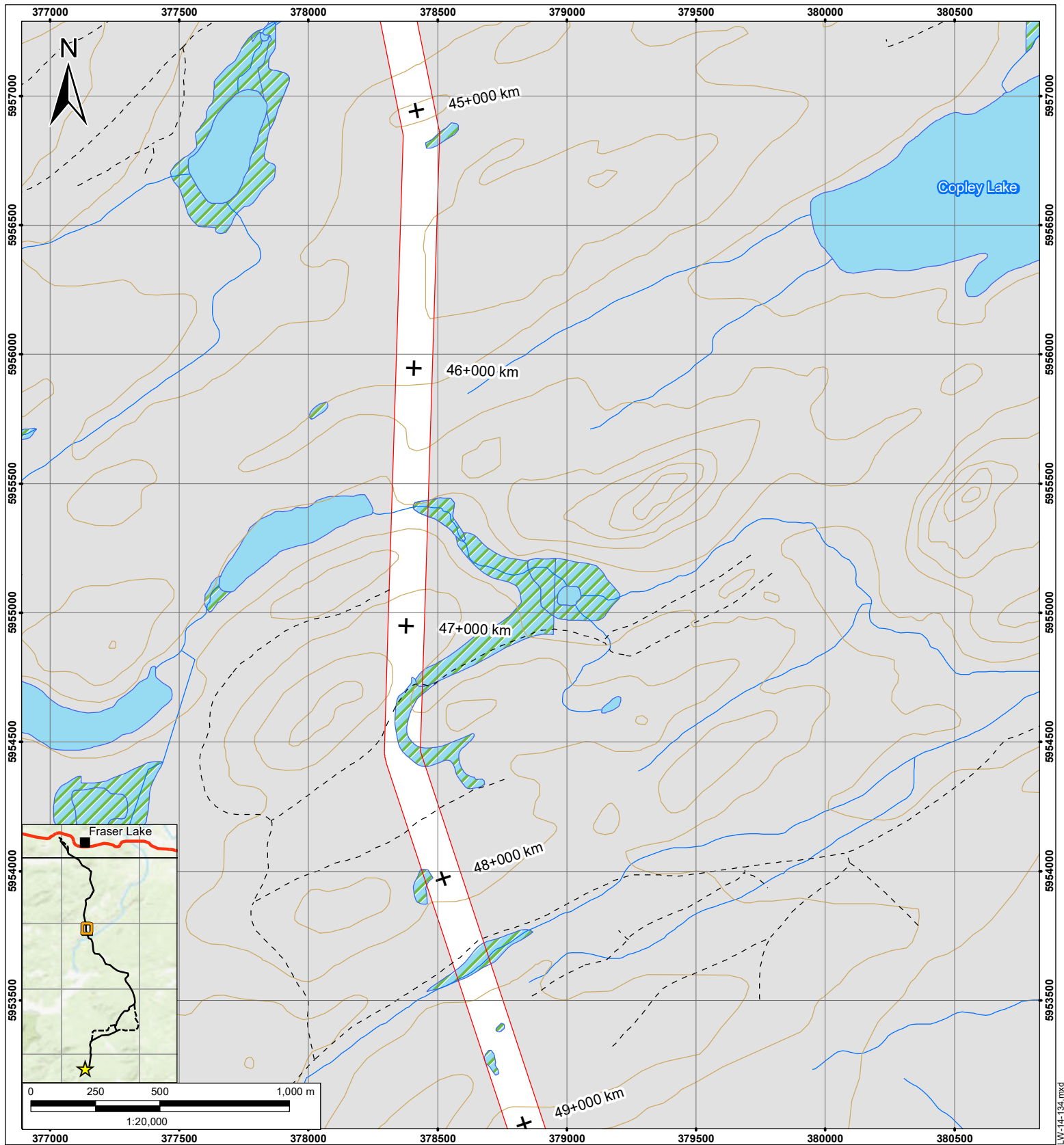
Sources: Esri, HERE, Garmin, Intermap, increment P Corp., GEBCO, USGS, FAO, NPS, NRCAN, GeoBase, IGN, Kadaster NL, Ordnance Survey, Esri Japan, METI, Esri China (Hong Kong), swisstopo, © OpenStreetMap contributors, and the GIS User Community. Contains information licensed under the Open Government Licence – British Columbia

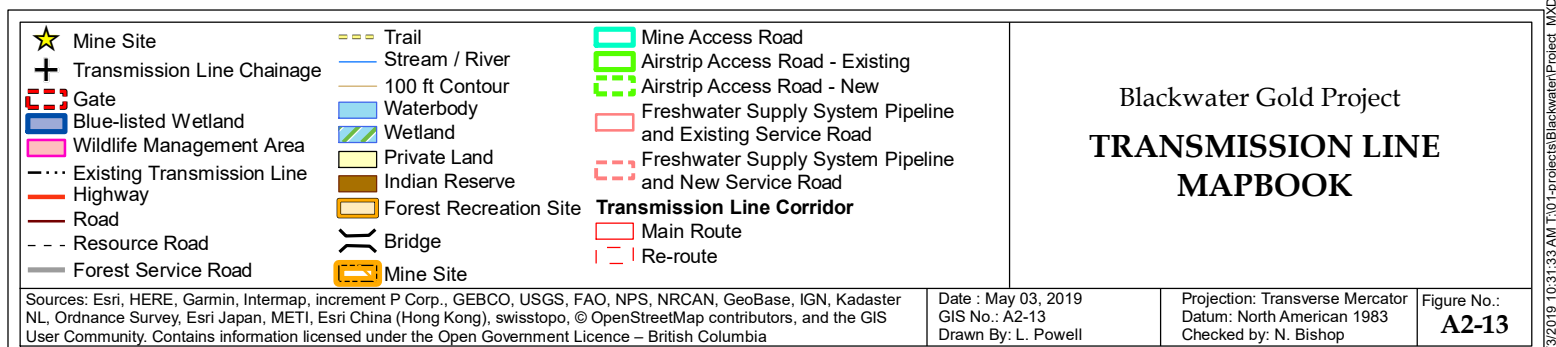
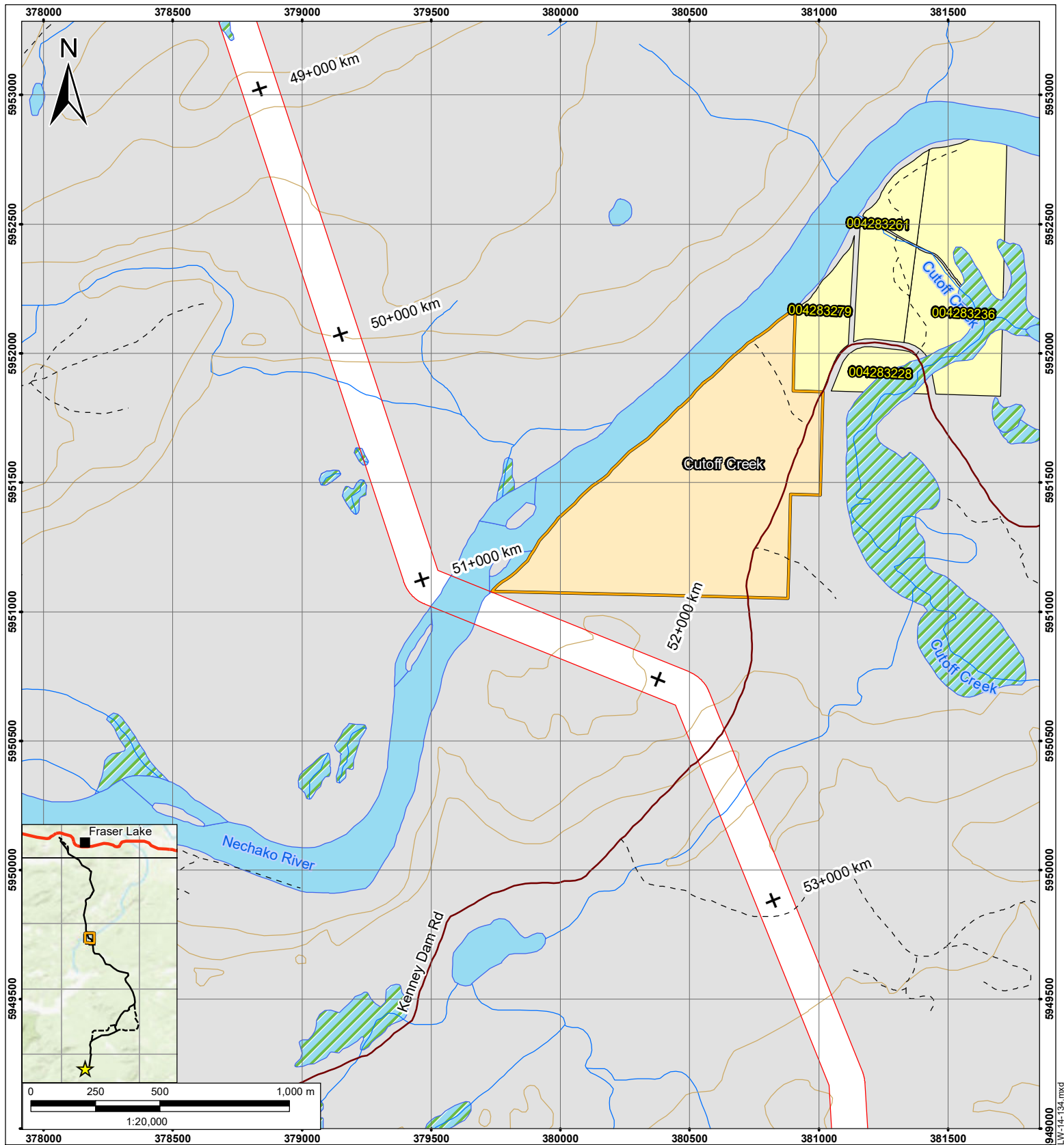
Date : May 03, 2019
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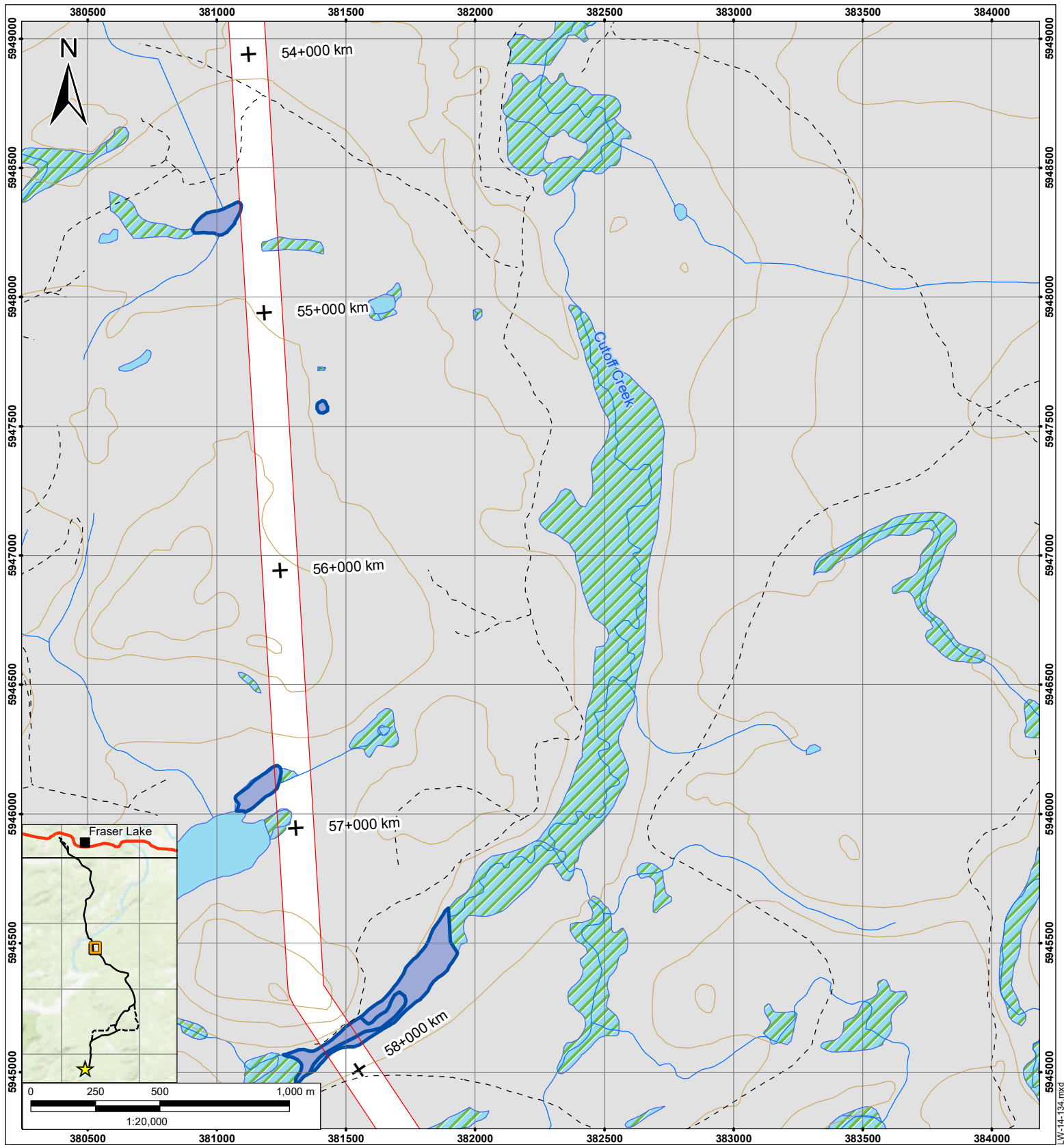
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Checked by: N. Bishop

Figure No.:
A2-10









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|---|--|---|

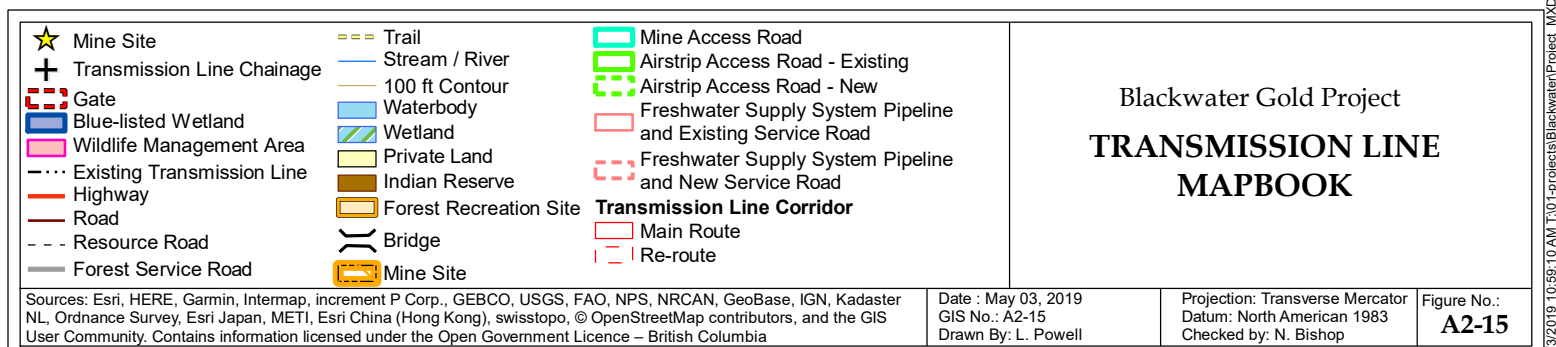
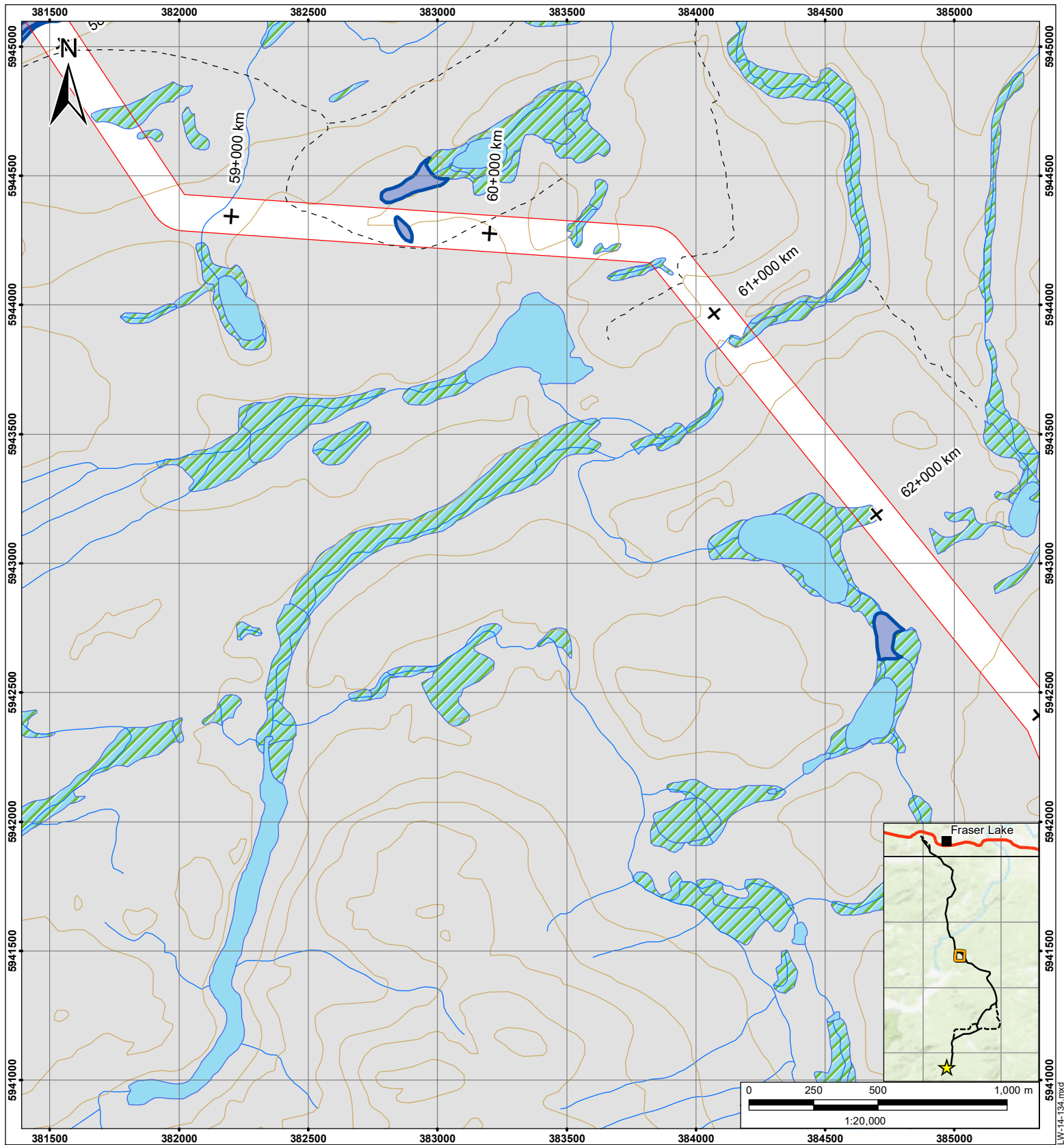
Blackwater Gold Project TRANSMISSION LINE MAPBOOK

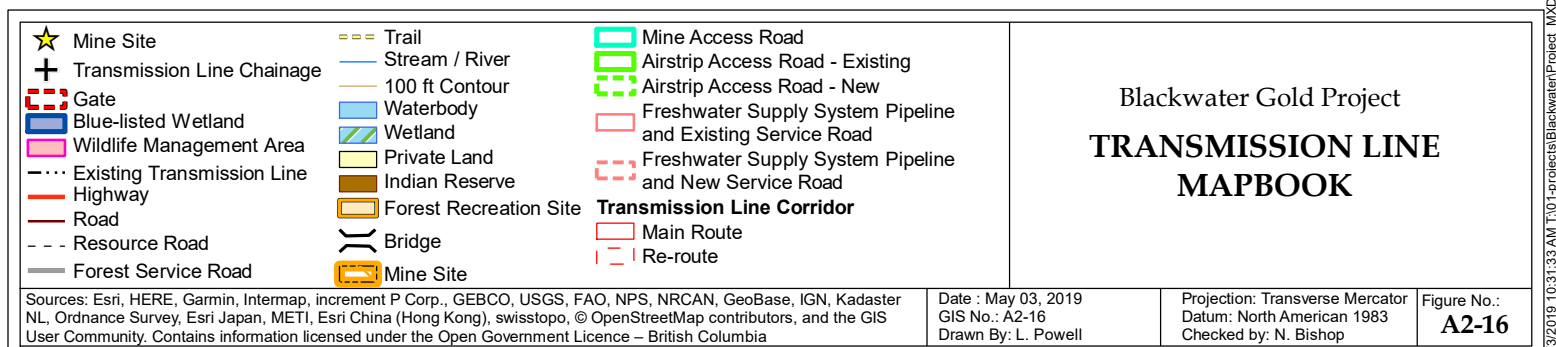
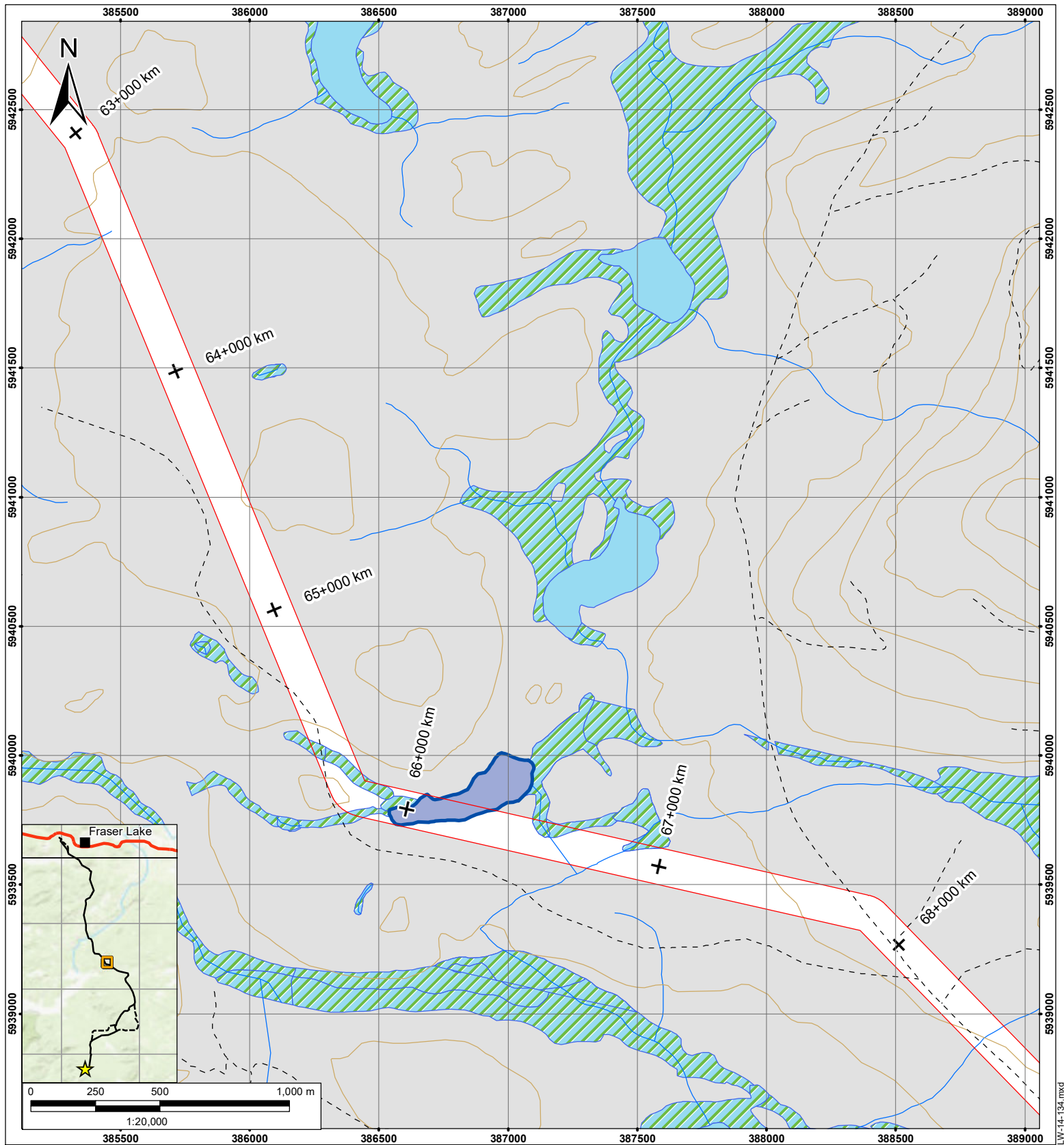
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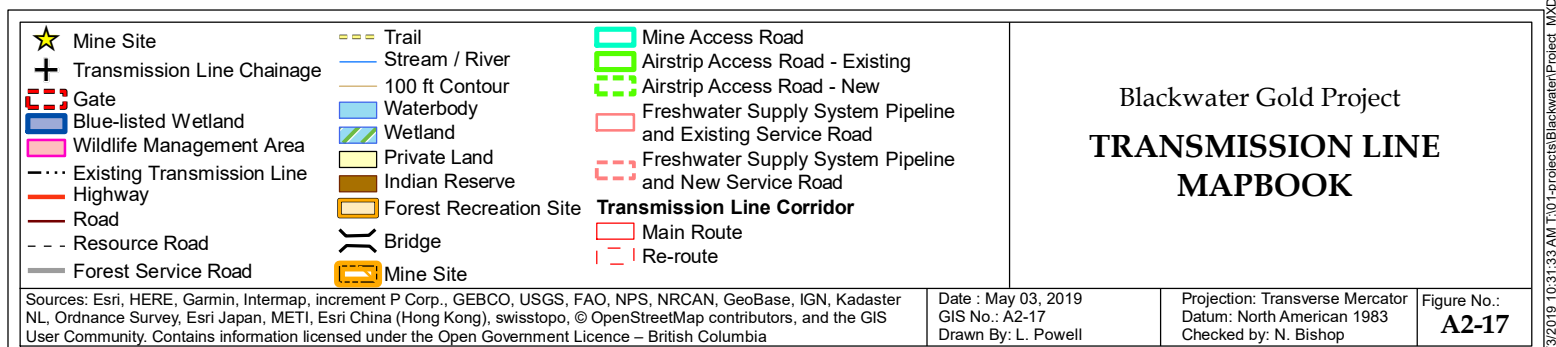
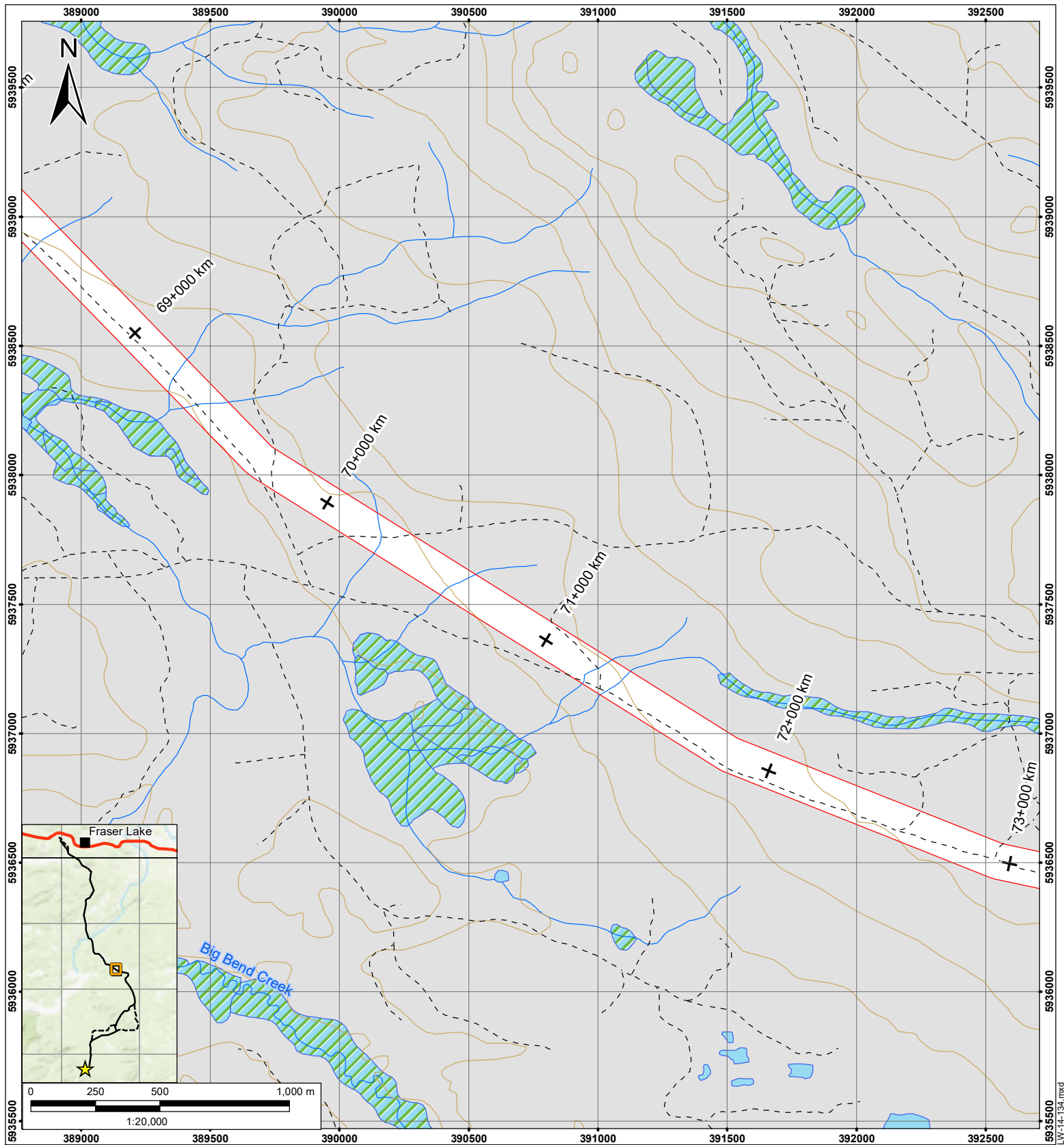
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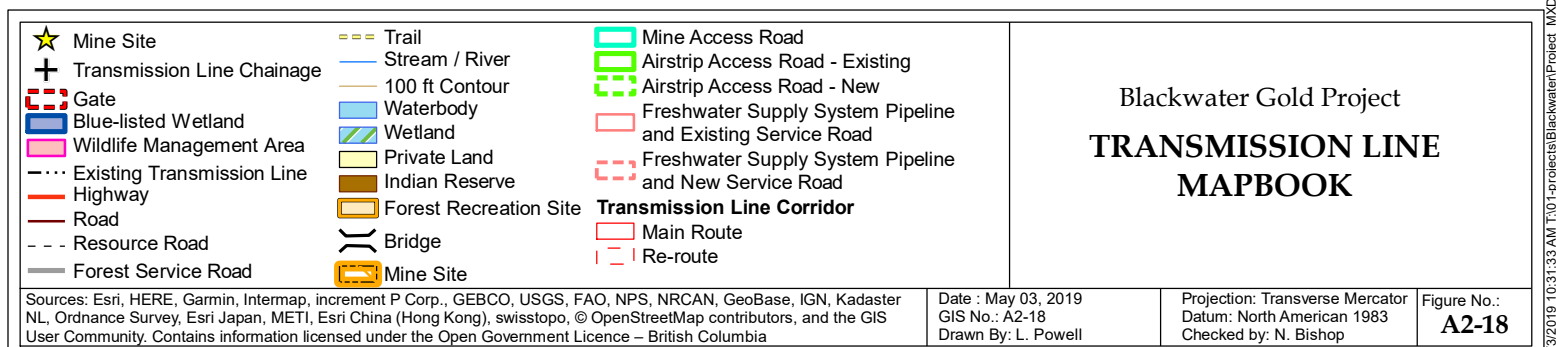
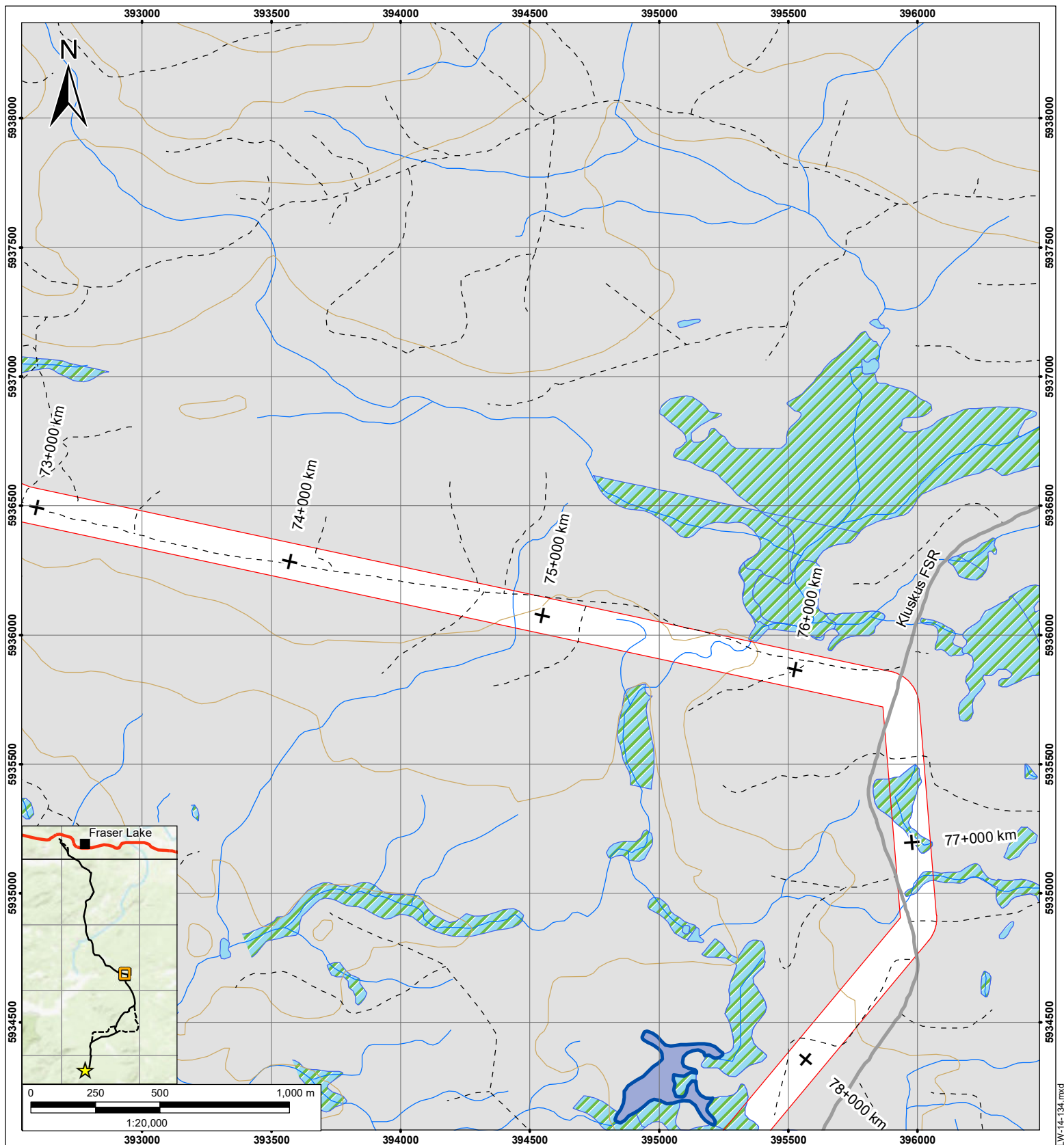
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Checked by: N. Bishop

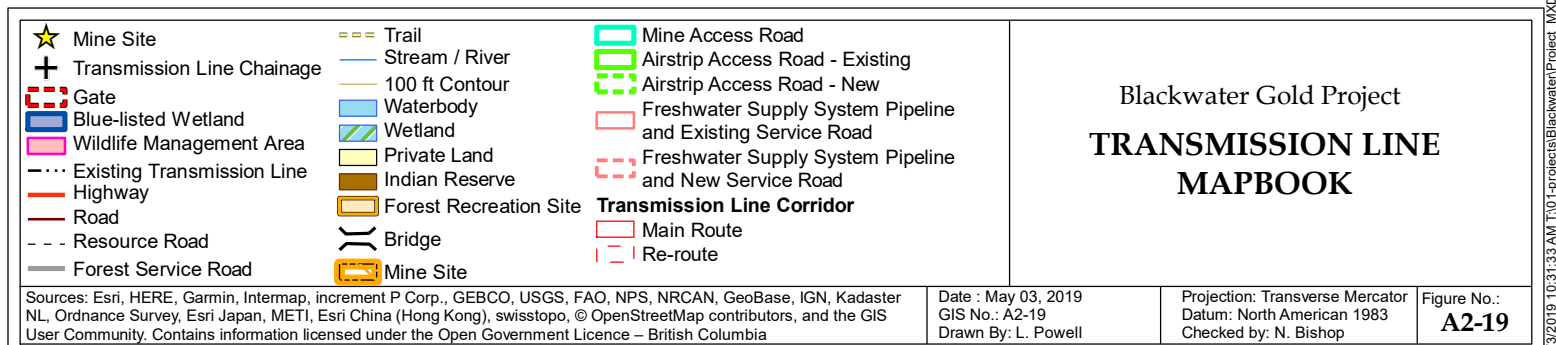
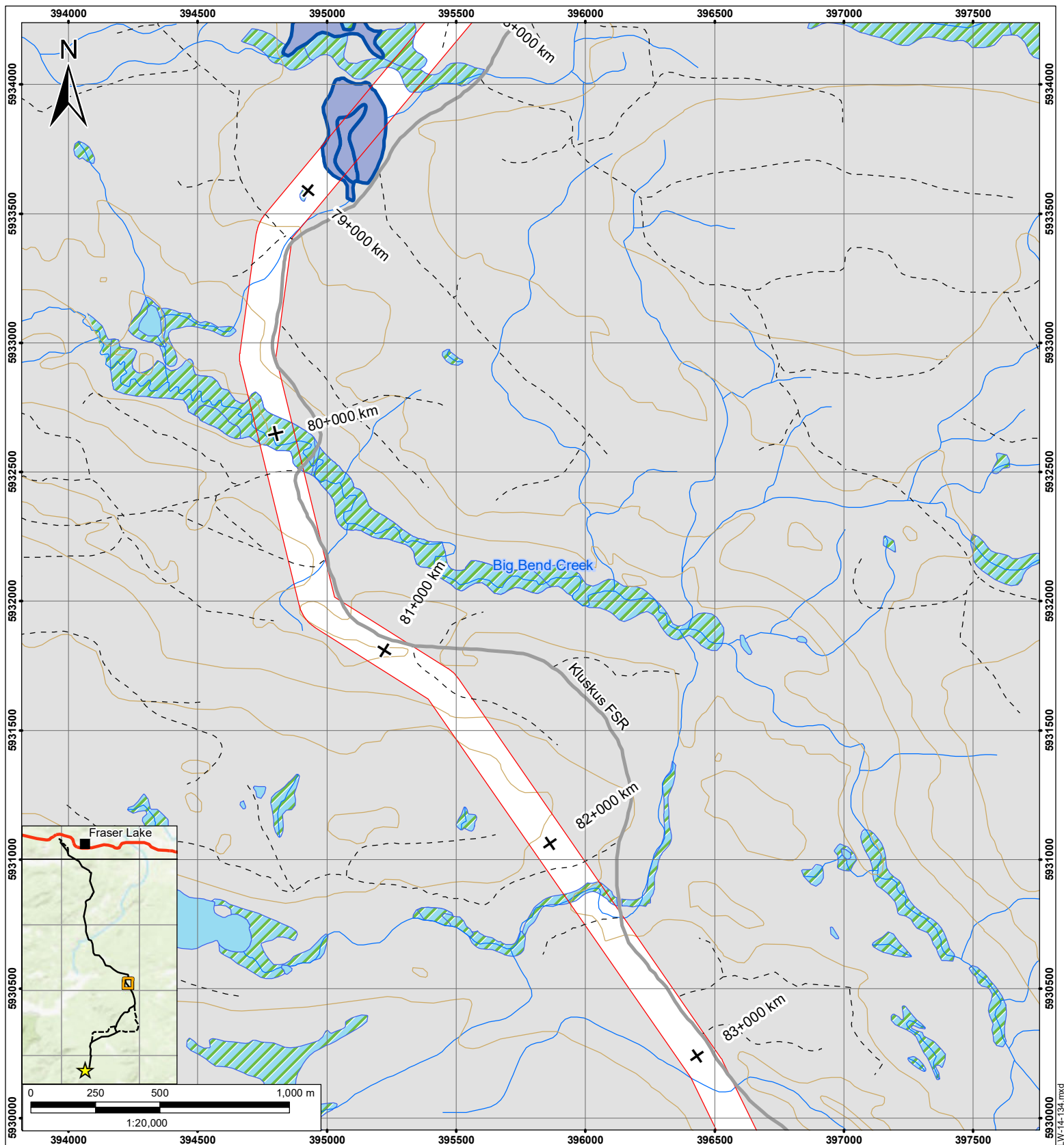
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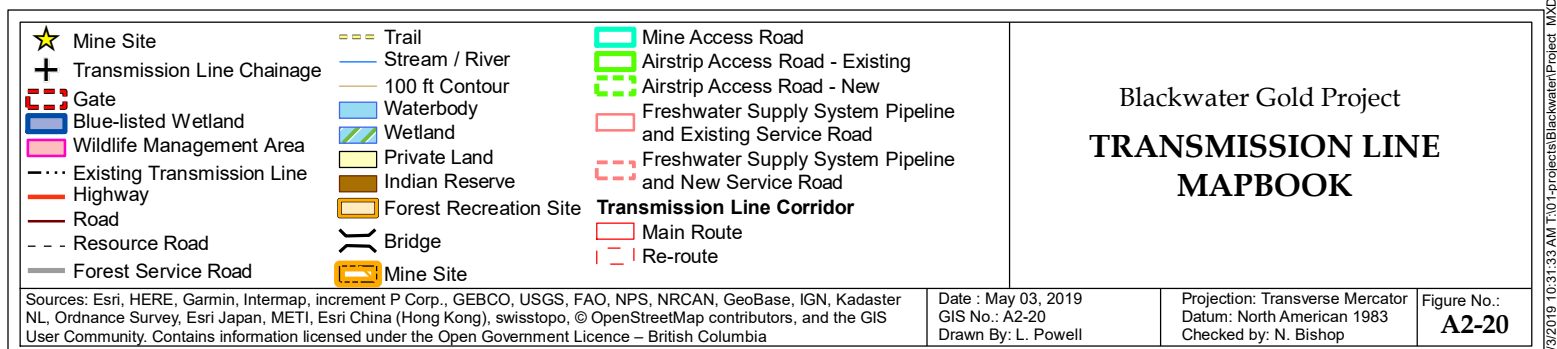
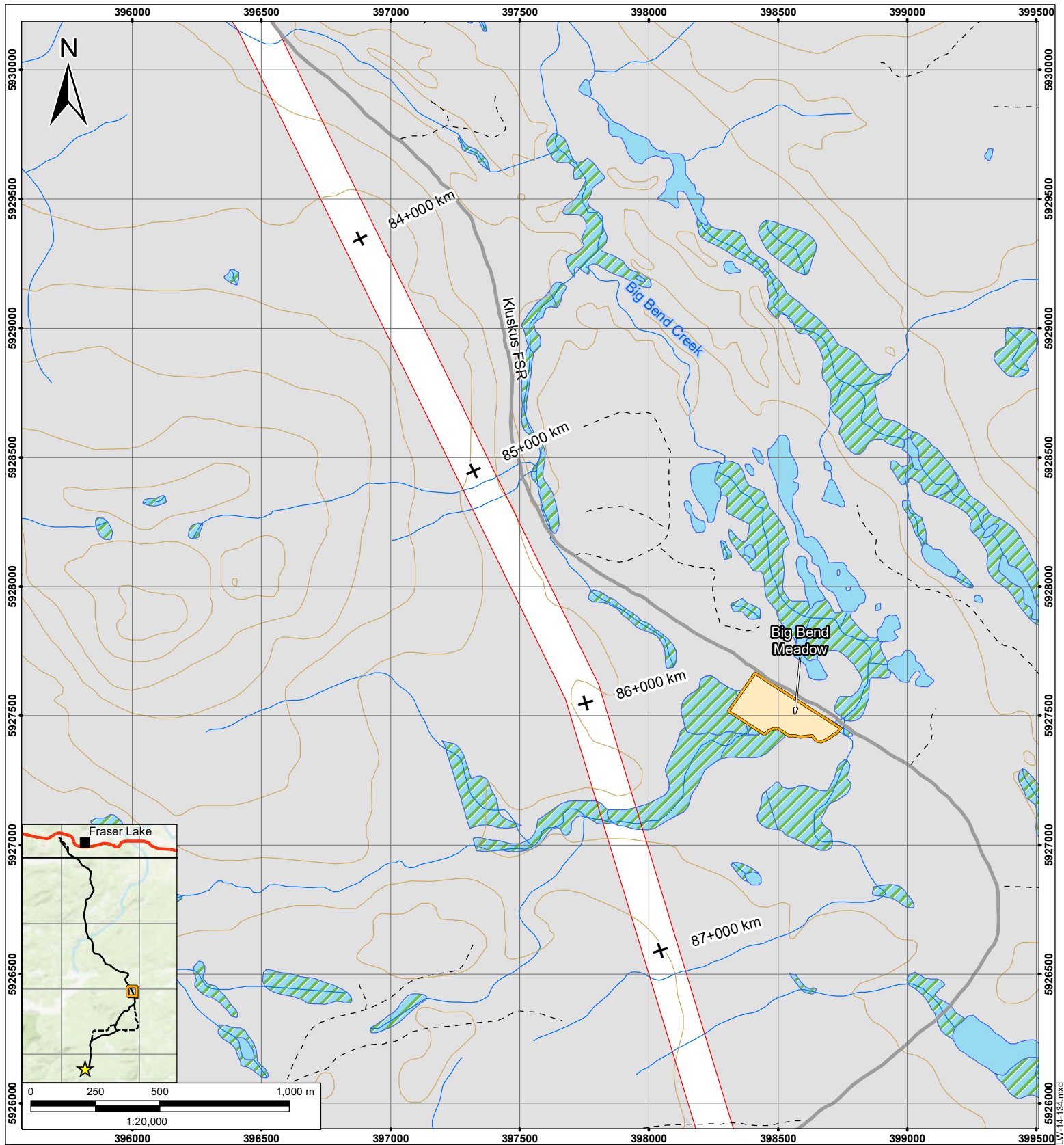


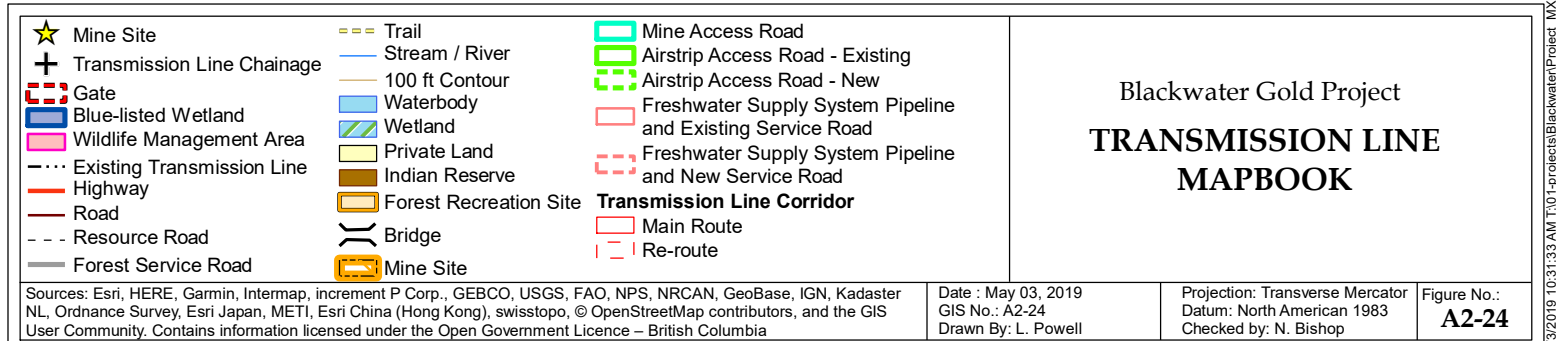
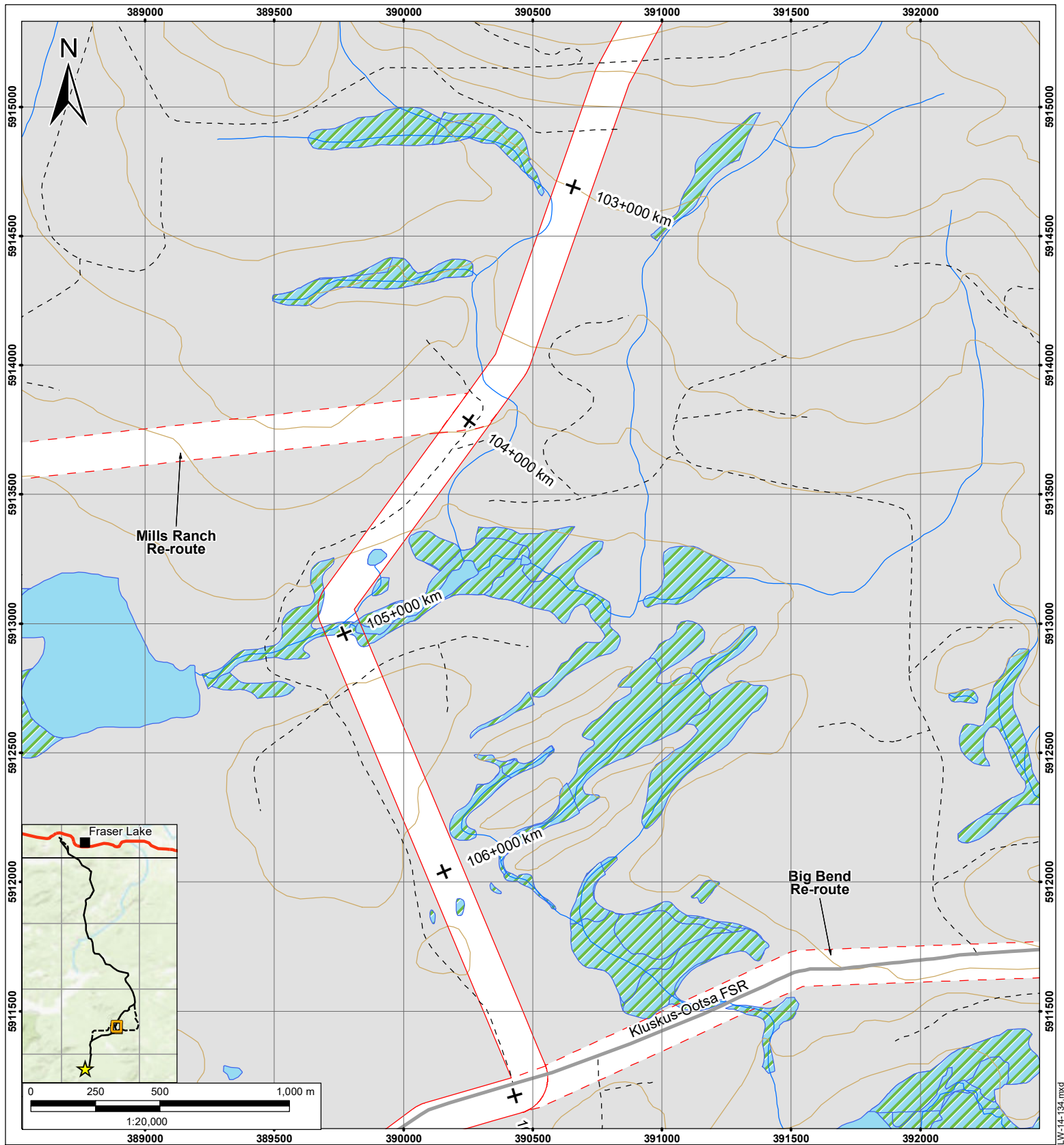


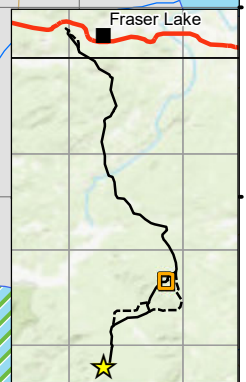
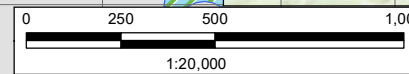
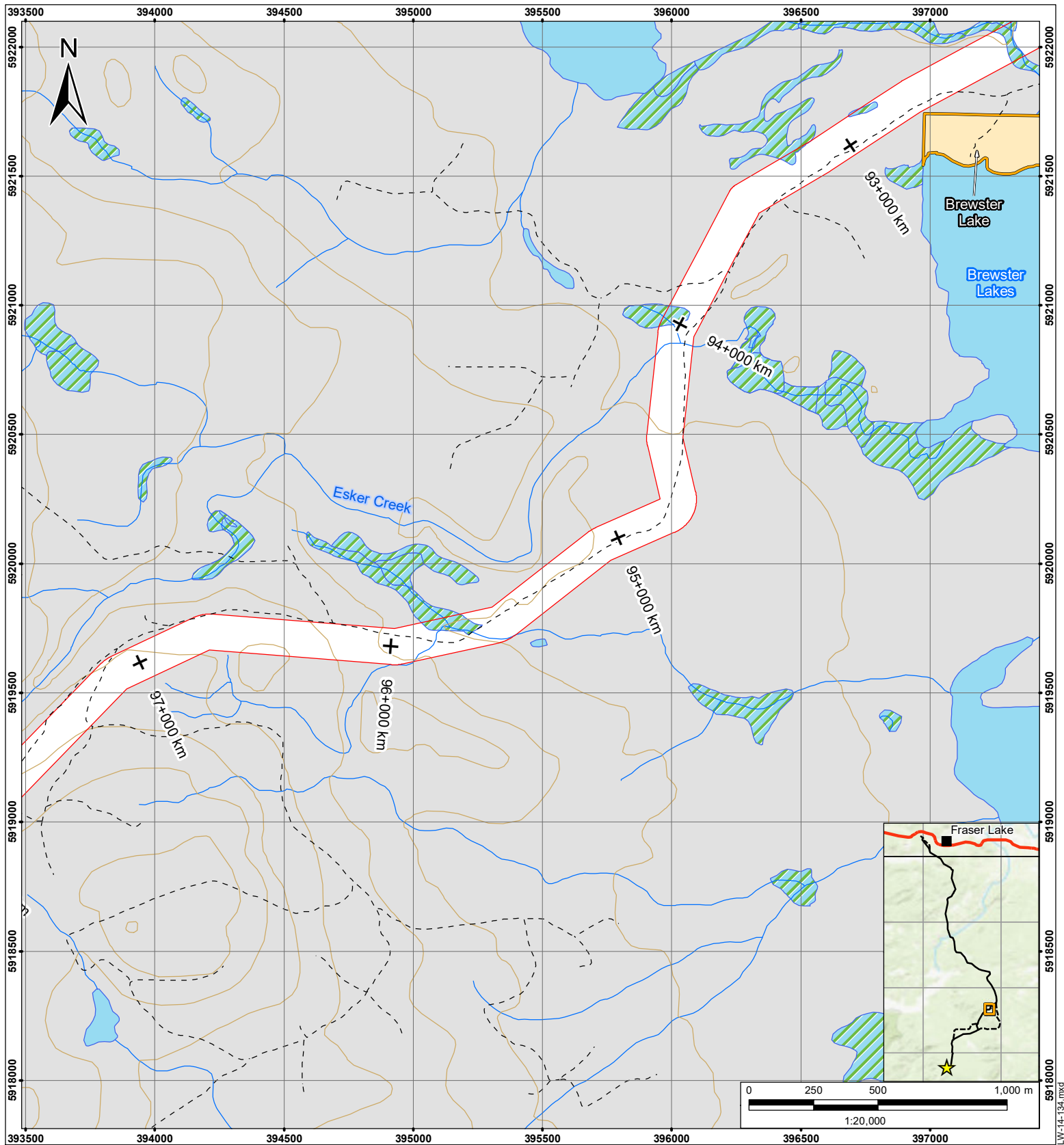












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| <ul style="list-style-type: none"> ★ Mine Site + Transmission Line Chainage Gate Blue-listed Wetland Wildlife Management Area Existing Transmission Line Highway Road Resource Road Forest Service Road | <ul style="list-style-type: none"> Trail Stream / River 100 ft Contour Waterbody Wetland Private Land Indian Reserve Forest Recreation Site Bridge Mine Site | <ul style="list-style-type: none"> Mine Access Road Airstrip Access Road - Existing Airstrip Access Road - New Freshwater Supply System Pipeline and Existing Service Road Freshwater Supply System Pipeline and New Service Road Transmission Line Corridor Main Route Re-route |
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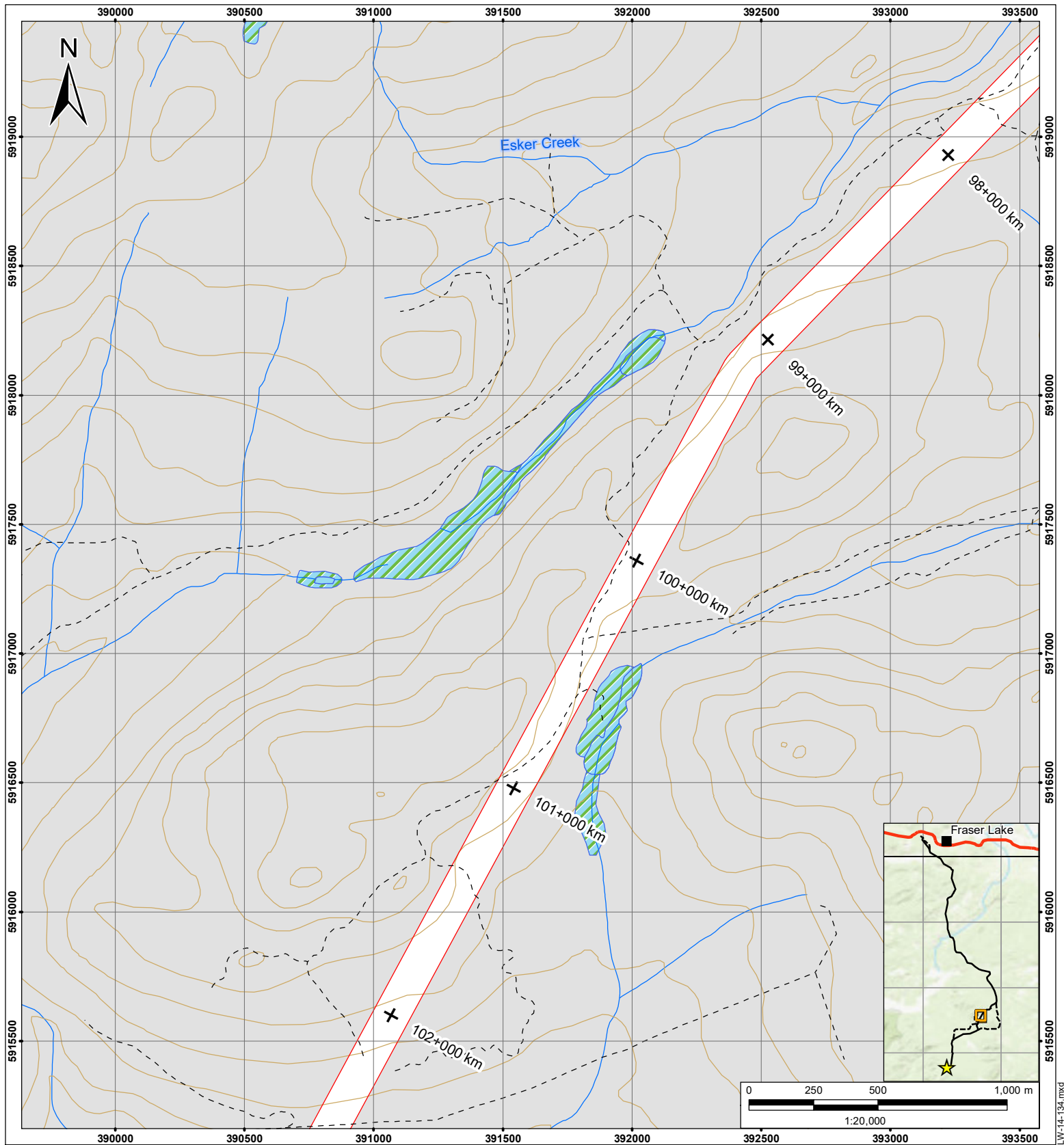
Blackwater Gold Project TRANSMISSION LINE MAPBOOK

Sources: Esri, HERE, Garmin, Intermap, increment P Corp., GEBCO, USGS, FAO, NPS, NRCAN, GeoBase, IGN, Kadaster NL, Ordnance Survey, Esri Japan, METI, Esri China (Hong Kong), swisstopo, © OpenStreetMap contributors, and the GIS User Community. Contains information licensed under the Open Government Licence – British Columbia

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Drawn By: L. Powell

Projection: Transverse Mercator
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Figure No.:
A2-22



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| <ul style="list-style-type: none"> ★ Mine Site + Transmission Line Chainage Gate Blue-listed Wetland Wildlife Management Area Existing Transmission Line Highway Road Resource Road Forest Service Road | <ul style="list-style-type: none"> Trail Stream / River 100 ft Contour Waterbody Wetland Private Land Indian Reserve Forest Recreation Site Bridge Mine Site | <ul style="list-style-type: none"> Mine Access Road Airstrip Access Road - Existing Airstrip Access Road - New Freshwater Supply System Pipeline and Existing Service Road Freshwater Supply System Pipeline and New Service Road Transmission Line Corridor Main Route Re-route |
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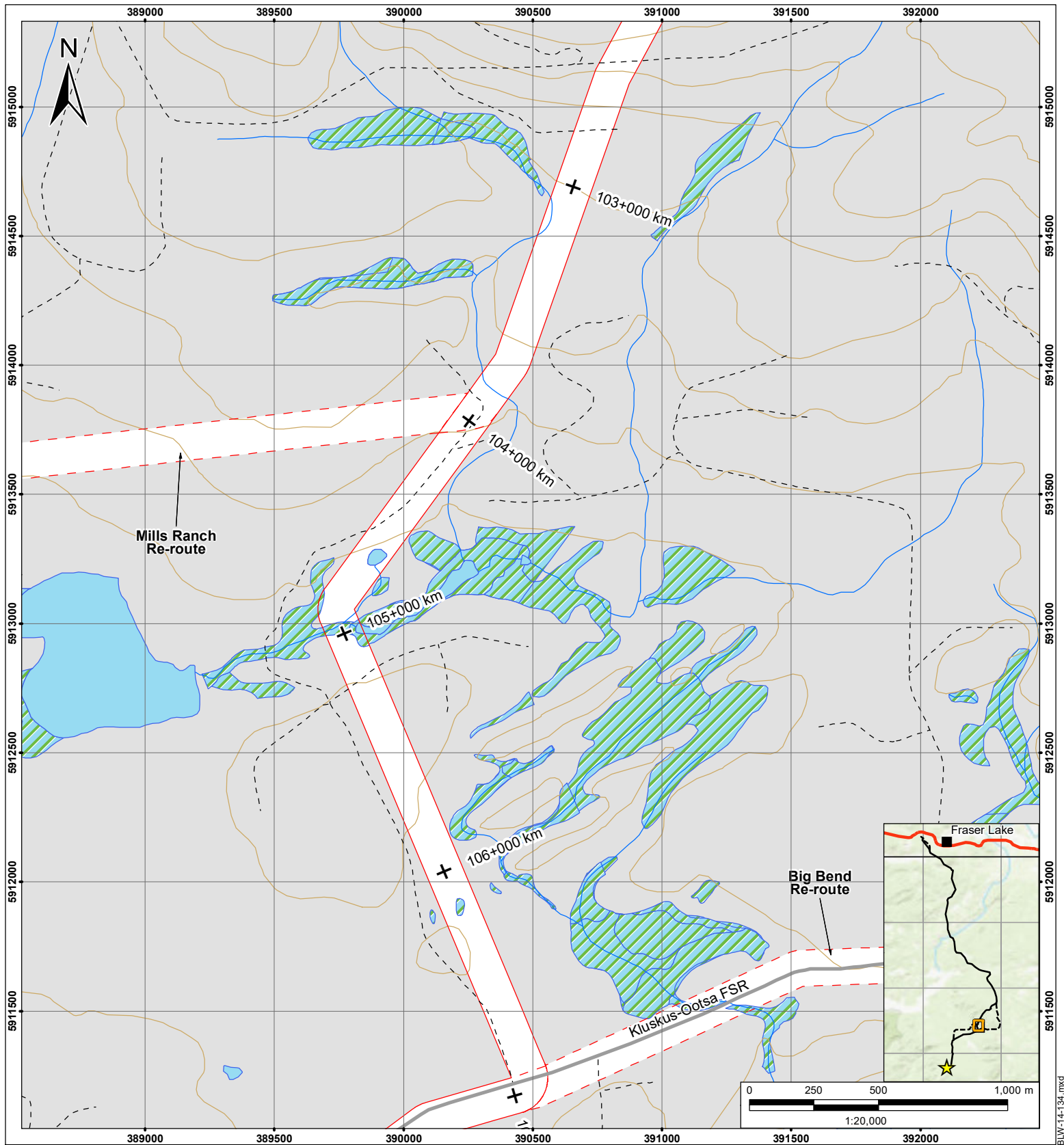
Blackwater Gold Project TRANSMISSION LINE MAPBOOK

Sources: Esri, HERE, Garmin, Intermap, increment P Corp., GEBCO, USGS, FAO, NPS, NRCAN, GeoBase, IGN, Kadaster NL, Ordnance Survey, Esri Japan, METI, Esri China (Hong Kong), swisstopo, © OpenStreetMap contributors, and the GIS User Community. Contains information licensed under the Open Government Licence – British Columbia

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Drawn By: L. Powell

Projection: Transverse Mercator
Datum: North American 1983
Checked by: N. Bishop

Figure No.:
A2-23



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| ★ Mine Site | --- Trail | ▬ Mine Access Road |
| + Transmission Line Chainage | — Stream / River | ▬ Airstrip Access Road - Existing |
| ▬ Gate | — 100 ft Contour | ▬ Airstrip Access Road - New |
| ▬ Blue-listed Wetland | ▬ Waterbody | ▬ Freshwater Supply System Pipeline and Existing Service Road |
| ▬ Wildlife Management Area | ▬ Wetland | ▬ Freshwater Supply System Pipeline and New Service Road |
| --- Existing Transmission Line | ▬ Private Land | Transmission Line Corridor |
| ▬ Highway | ▬ Indian Reserve | ▬ Main Route |
| ▬ Road | ▬ Forest Recreation Site | ▬ Re-route |
| --- Resource Road | ▬ Bridge | |
| ▬ Forest Service Road | ▬ Mine Site | |

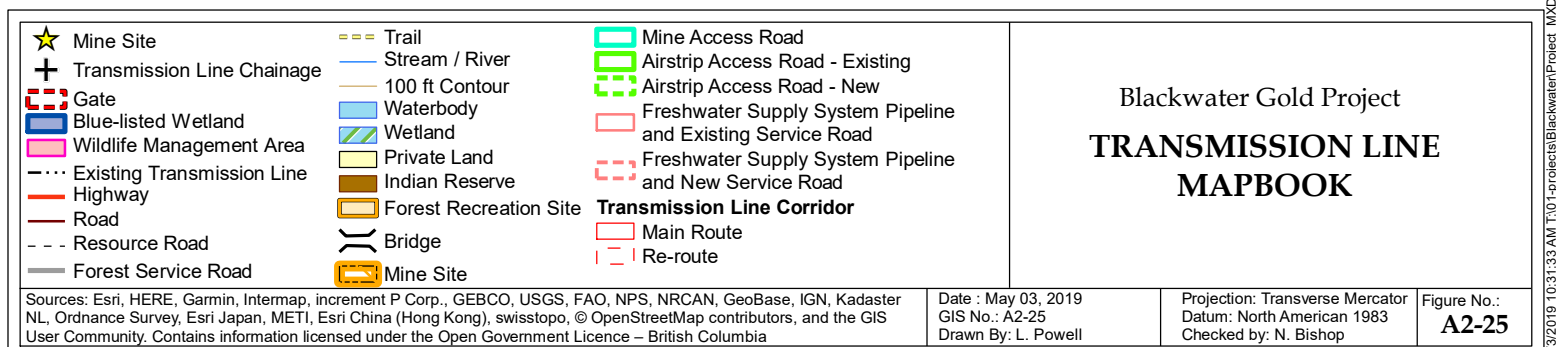
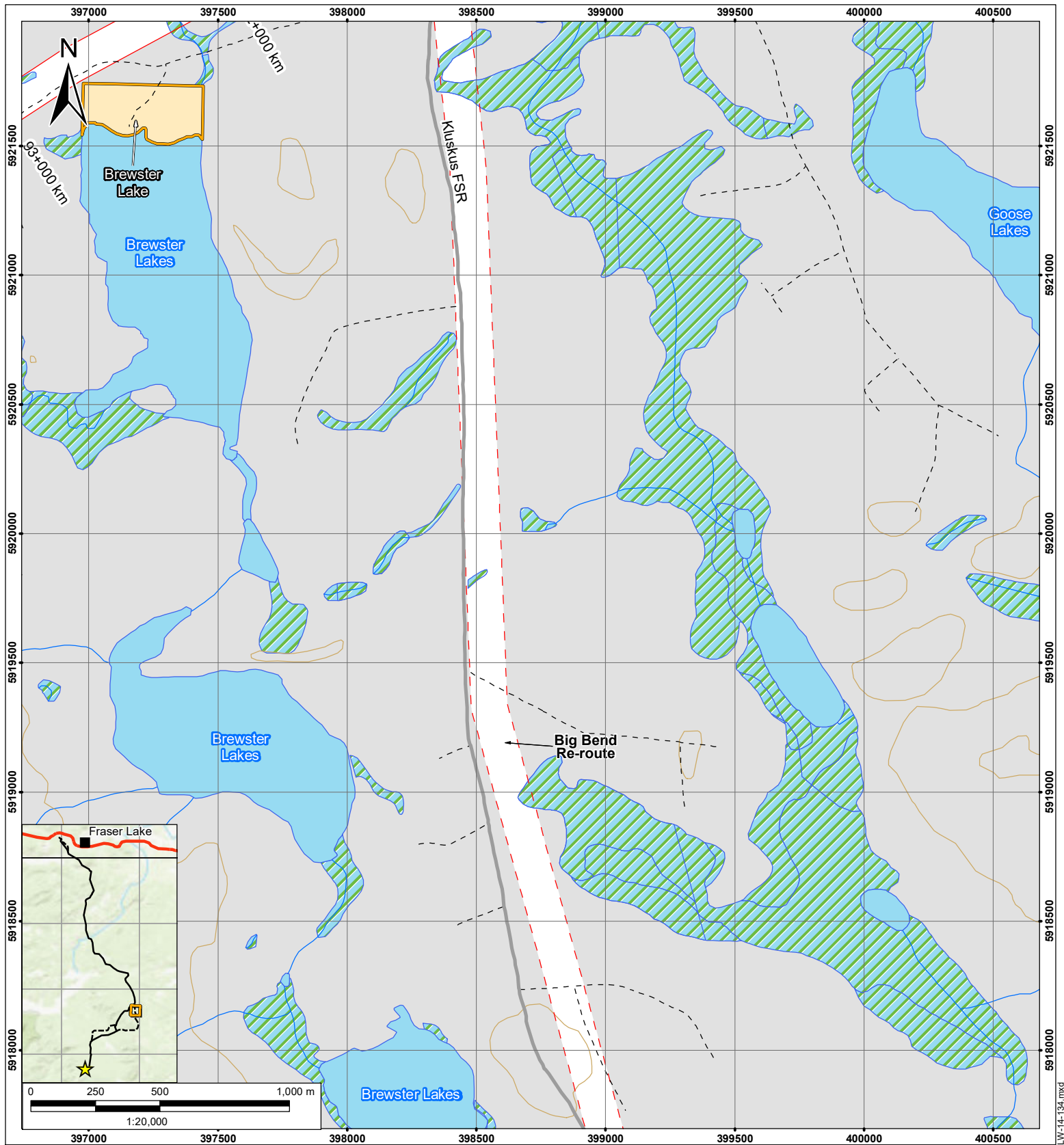
Blackwater Gold Project TRANSMISSION LINE MAPBOOK

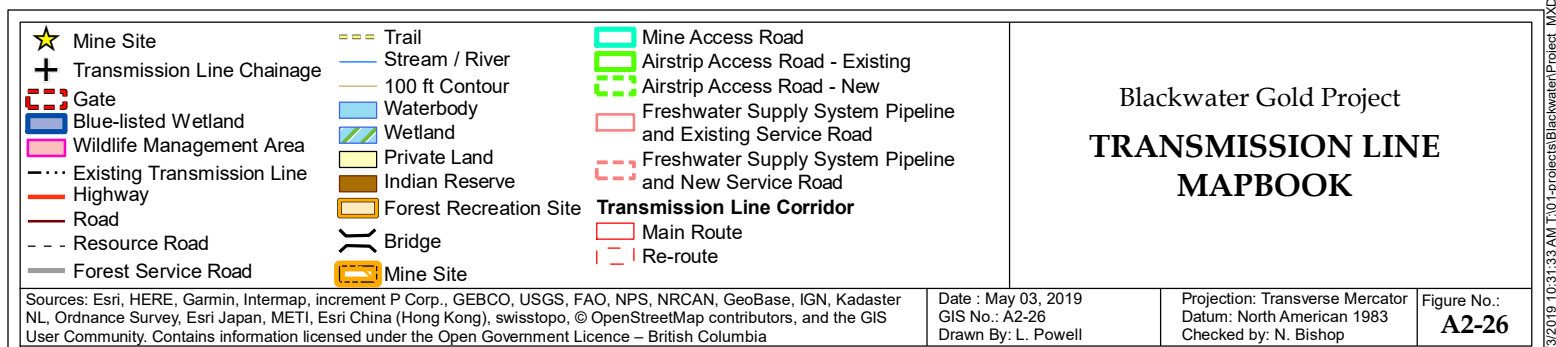
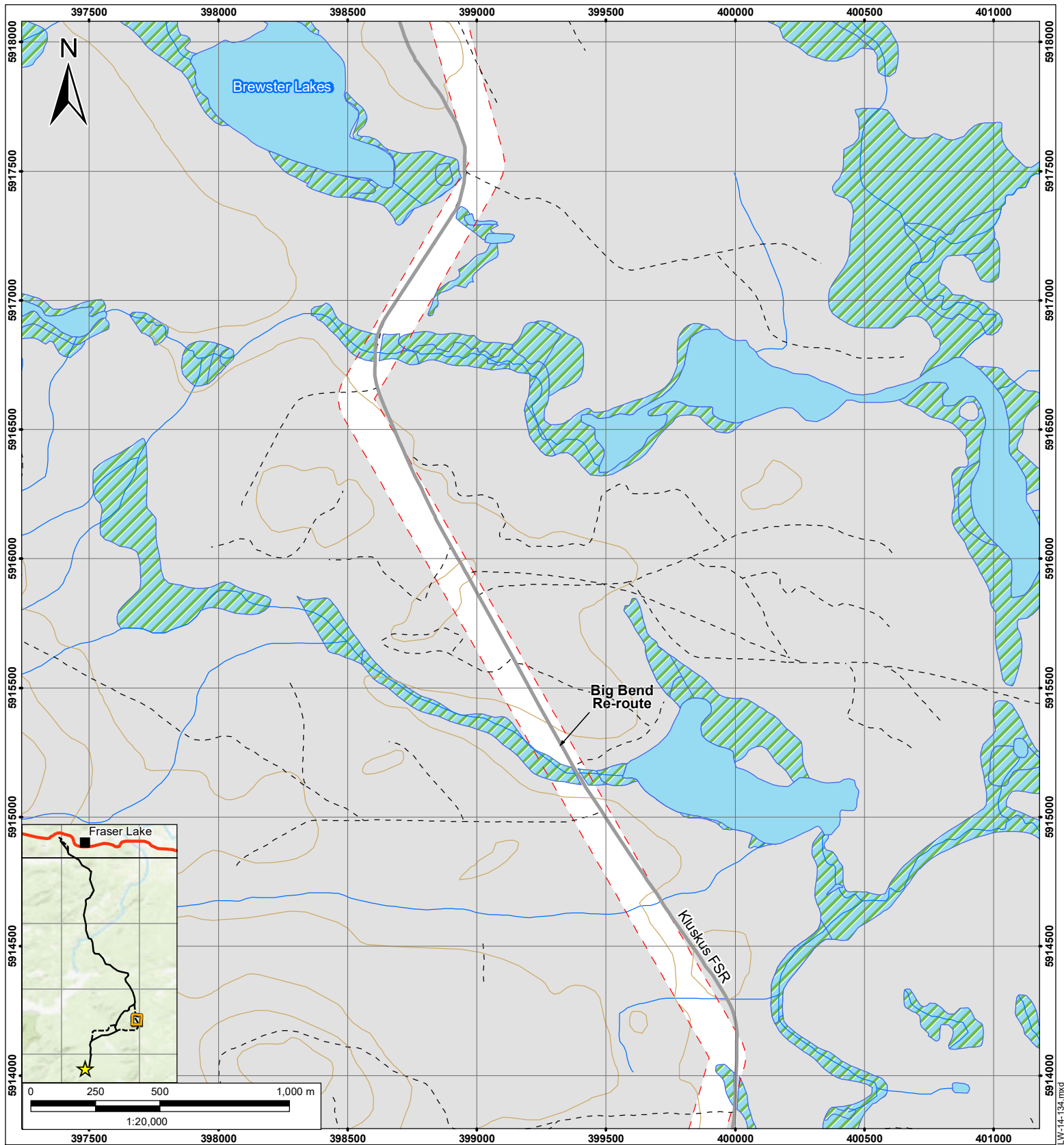
Sources: Esri, HERE, Garmin, Intermap, increment P Corp., GEBCO, USGS, FAO, NPS, NRCAN, GeoBase, IGN, Kadaster NL, Ordnance Survey, Esri Japan, METI, Esri China (Hong Kong), swisstopo, © OpenStreetMap contributors, and the GIS User Community. Contains information licensed under the Open Government Licence – British Columbia

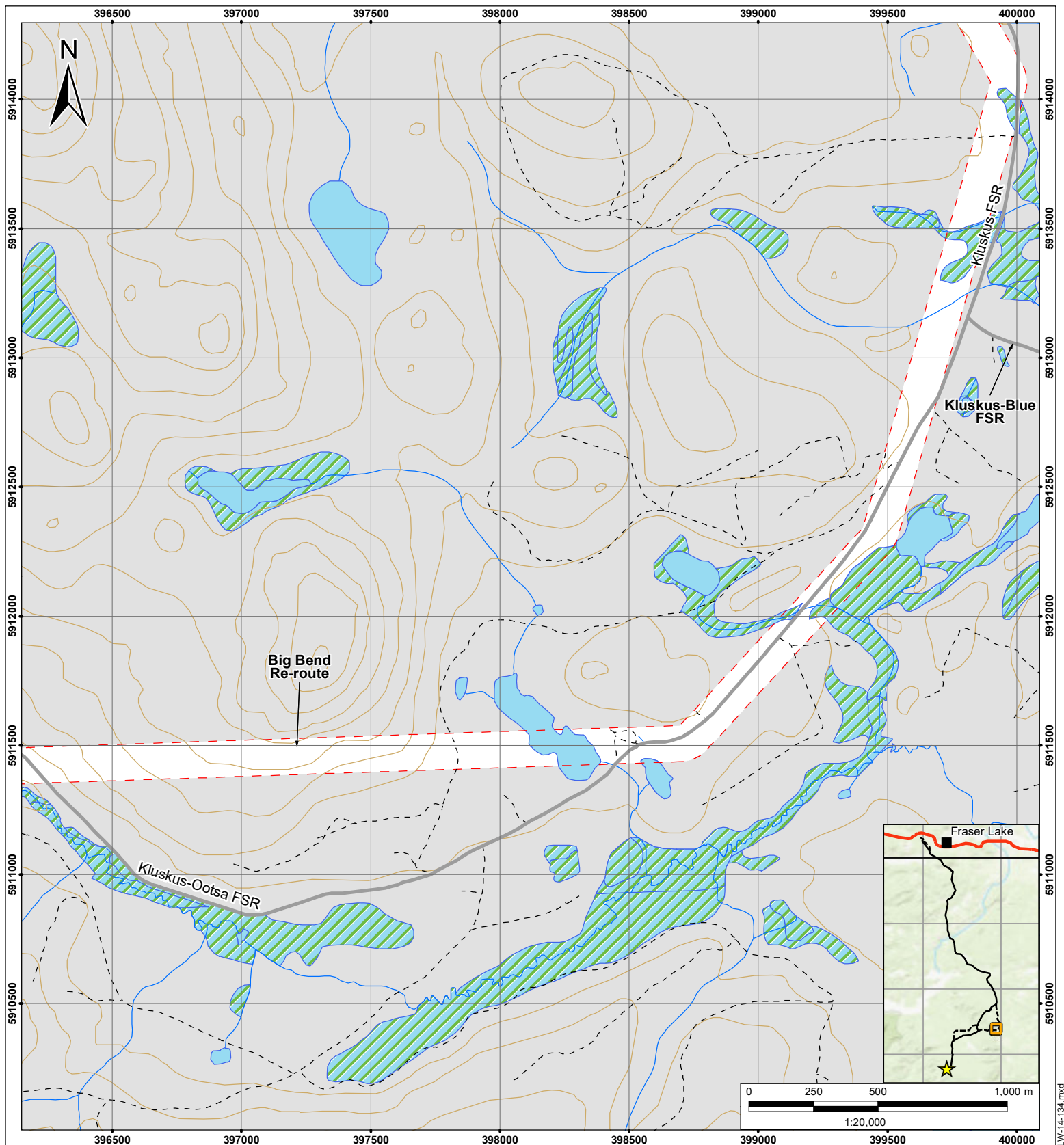
Date : March 12, 2019
GIS No.: A2-24
Drawn By: L. Powell

Projection: Transverse Mercator
Datum: North American 1983
Checked by: N. Bishop

Figure No.:
A2-24







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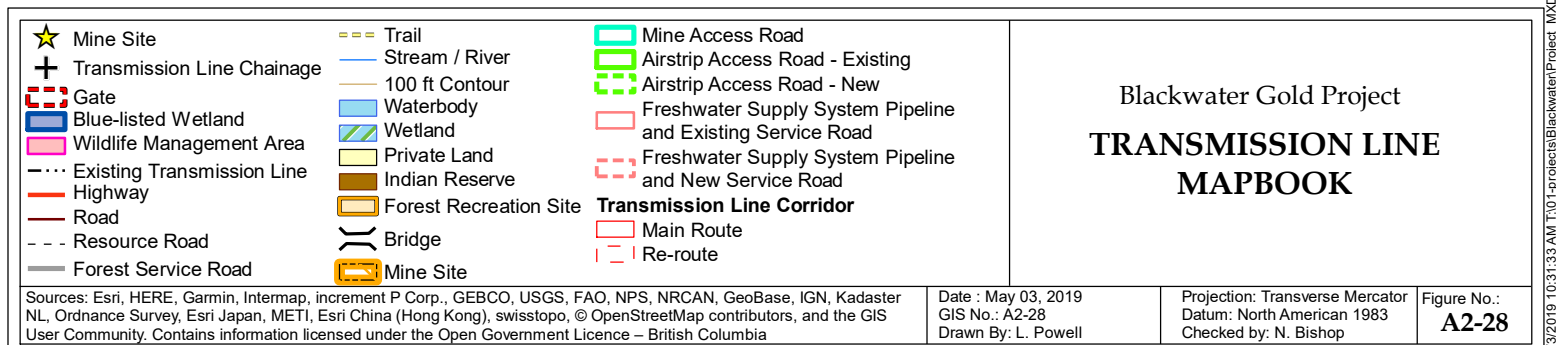
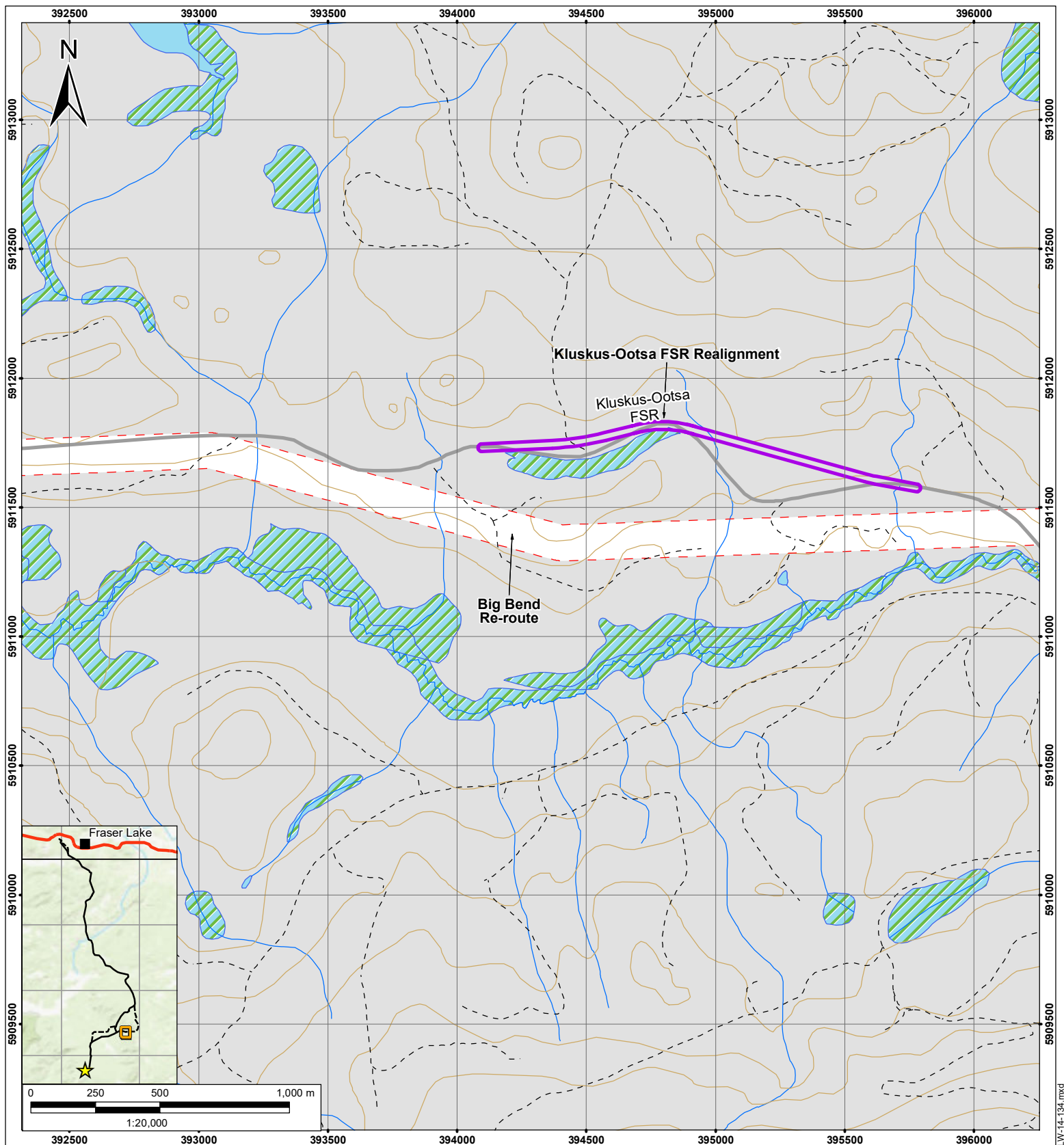
Blackwater Gold Project TRANSMISSION LINE MAPBOOK

Sources: Esri, HERE, Garmin, Intermap, increment P Corp., GEBCO, USGS, FAO, NPS, NRCAN, GeoBase, IGN, Kadaster NL, Ordnance Survey, Esri Japan, METI, Esri China (Hong Kong), swisstopo, © OpenStreetMap contributors, and the GIS User Community. Contains information licensed under the Open Government Licence – British Columbia

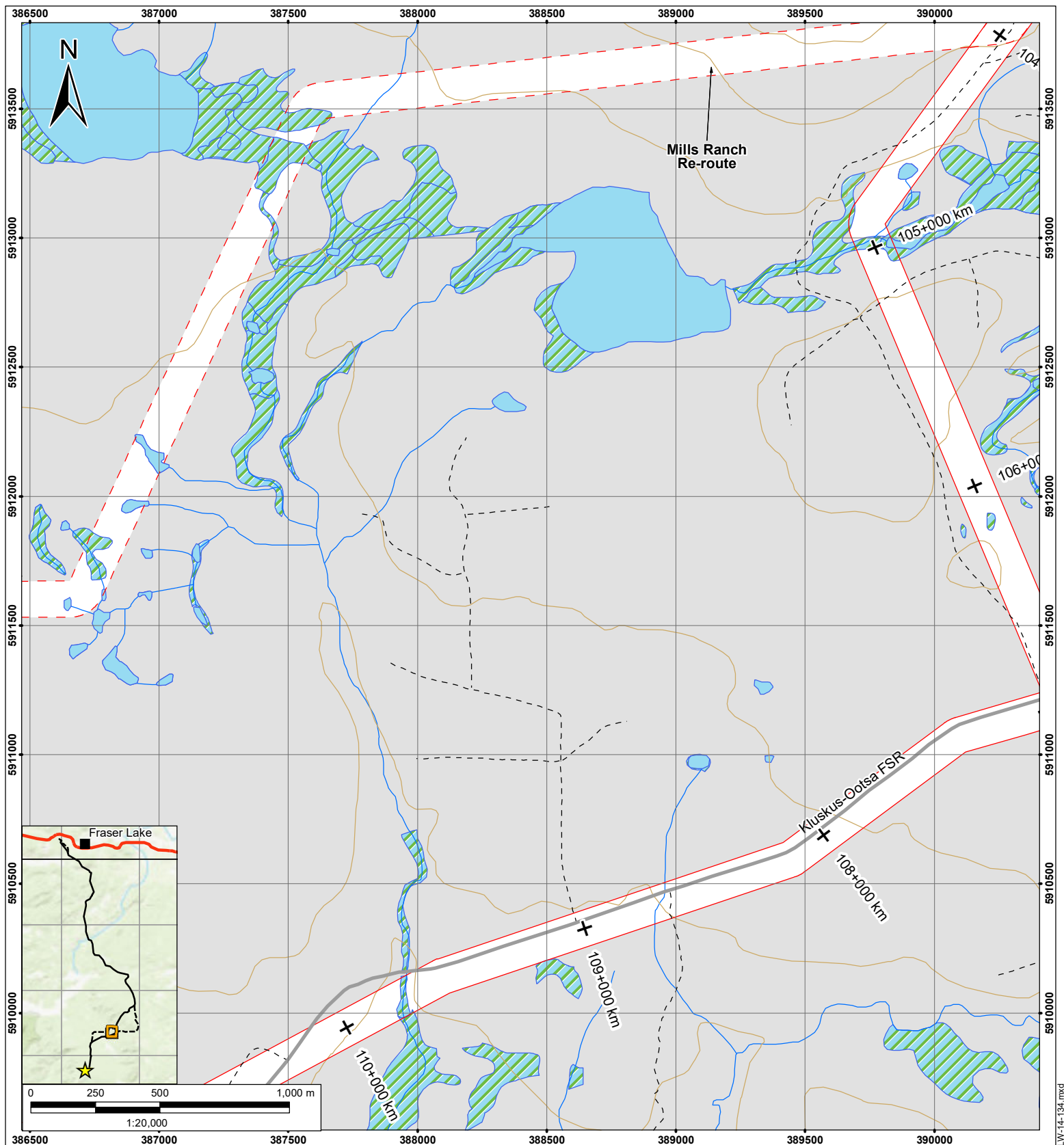
Date : May 03, 2019
GIS No.: A2-27
Drawn By: L. Powell

Projection: Transverse Mercator
Datum: North American 1983
Checked by: N. Bishop

Figure No.:
A2-27



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| <ul style="list-style-type: none"> ★ Mine Site ✚ Transmission Line Chainage ⬢ Gate ⬢ Blue-listed Wetland ⬢ Wildlife Management Area ⬢ Existing Transmission Line ⬢ Highway ⬢ Road ⬢ Resource Road ⬢ Forest Service Road | <ul style="list-style-type: none"> ⬢ Trail ⬢ Stream / River ⬢ 100 ft Contour ⬢ Waterbody ⬢ Wetland ⬢ Private Land ⬢ Indian Reserve ⬢ Forest Recreation Site ⬢ Bridge ⬢ Mine Site | <ul style="list-style-type: none"> ⬢ Mine Access Road ⬢ Airstrip Access Road - Existing ⬢ Airstrip Access Road - New ⬢ Freshwater Supply System Pipeline and Existing Service Road ⬢ Freshwater Supply System Pipeline and New Service Road Transmission Line Corridor ⬢ Main Route ⬢ Re-route |
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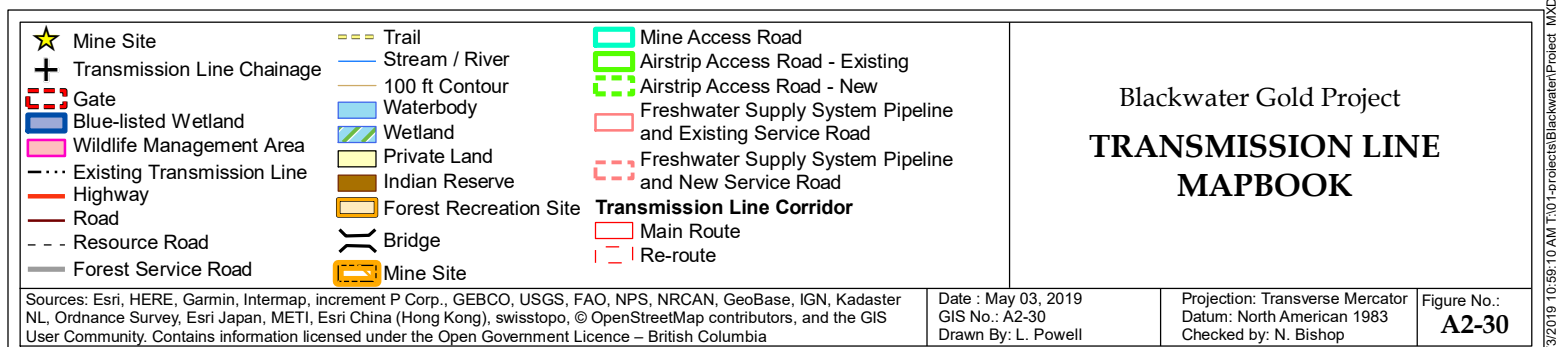
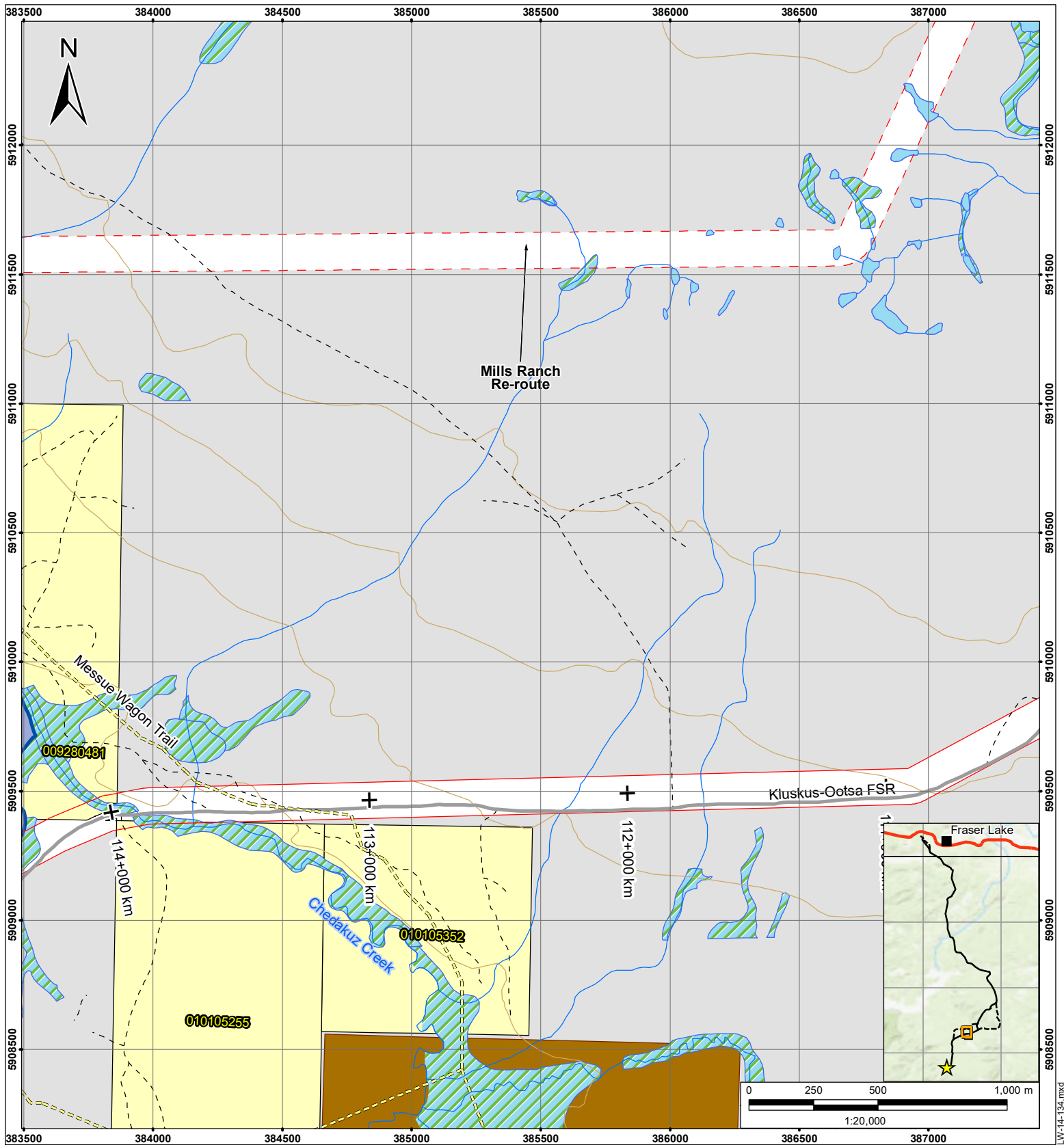
Blackwater Gold Project TRANSMISSION LINE MAPBOOK

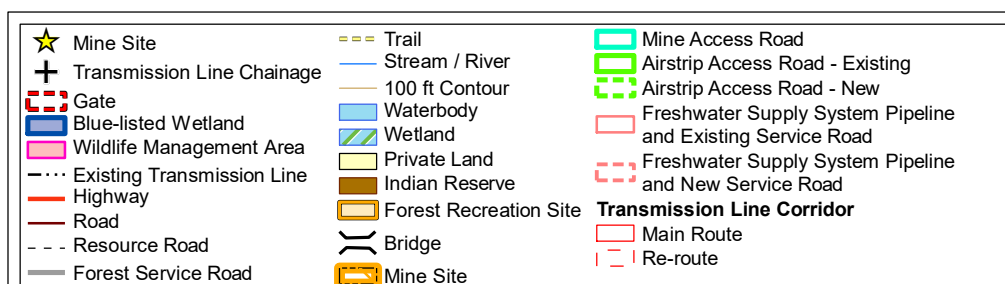
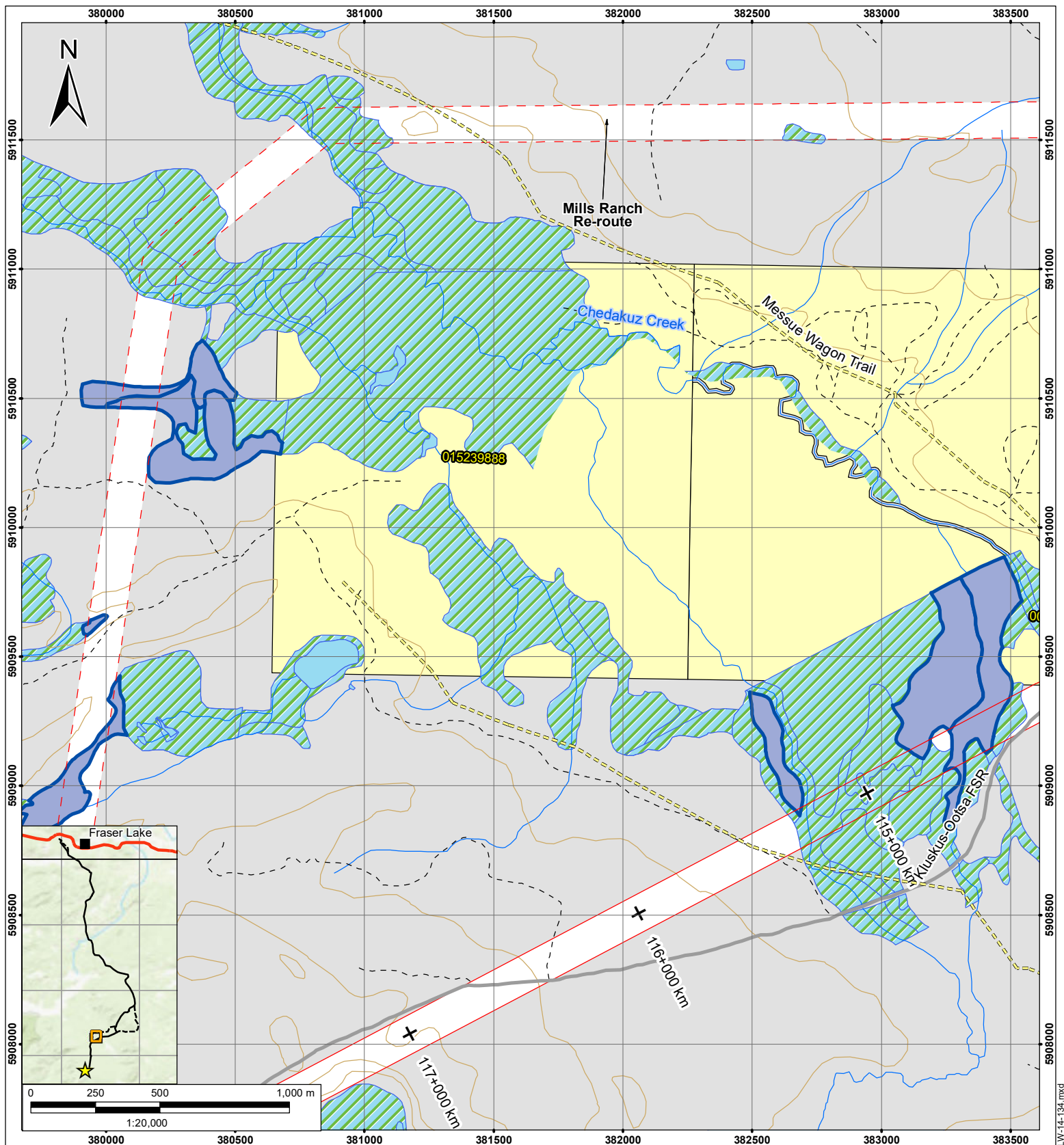
Sources: Esri, HERE, Garmin, Intermap, increment P Corp., GEBCO, USGS, FAO, NPS, NRCAN, GeoBase, IGN, Kadaster NL, Ordnance Survey, Esri Japan, METI, Esri China (Hong Kong), swisstopo, © OpenStreetMap contributors, and the GIS User Community. Contains information licensed under the Open Government Licence – British Columbia

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Figure No.:
A2-29





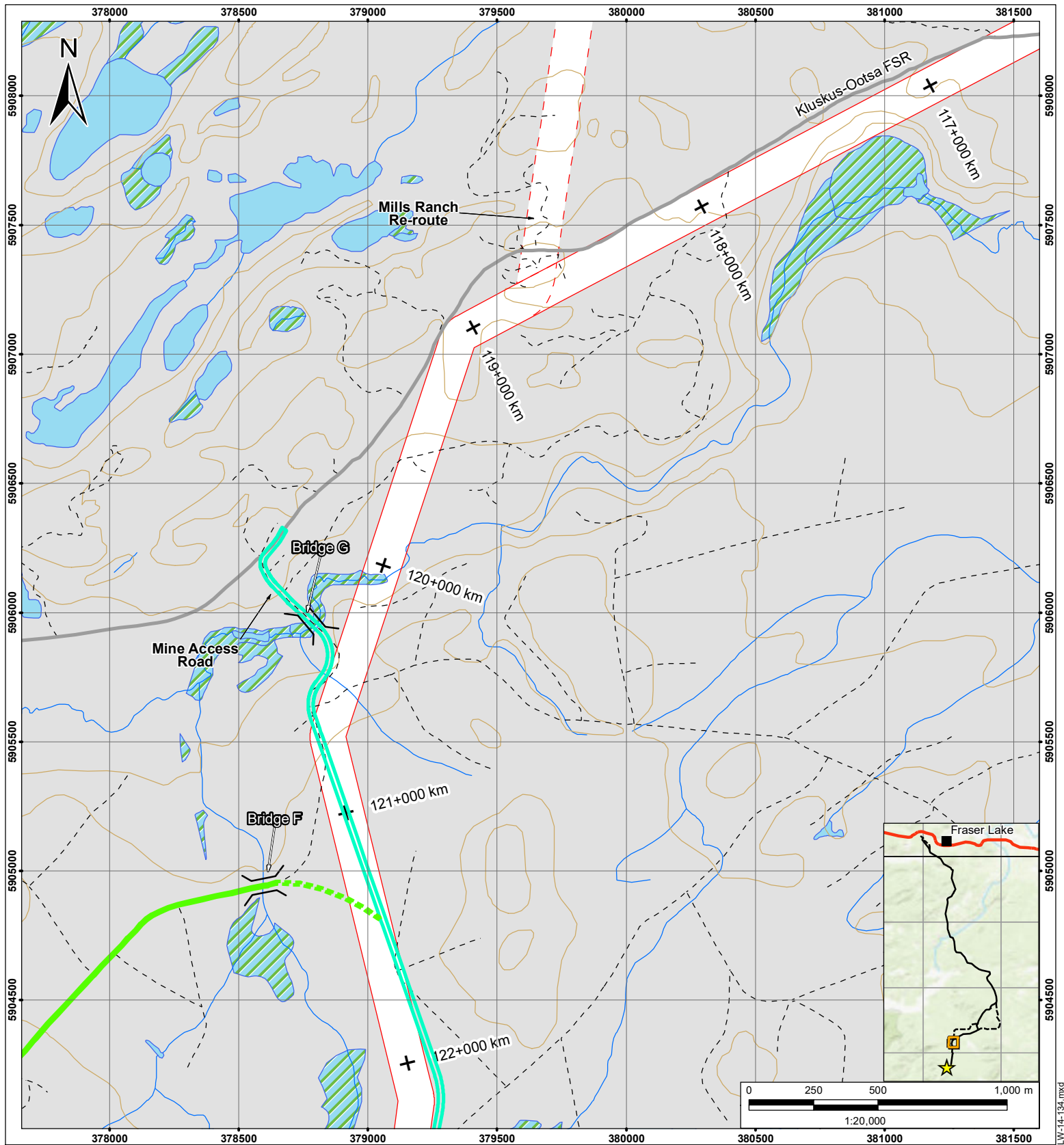
Blackwater Gold Project TRANSMISSION LINE MAPBOOK

Sources: Esri, HERE, Garmin, Intermap, increment P Corp., GEBCO, USGS, FAO, NPS, NRCAN, GeoBase, IGN, Kadaster NL, Ordnance Survey, Esri Japan, METI, Esri China (Hong Kong), swisstopo, © OpenStreetMap contributors, and the GIS User Community. Contains information licensed under the Open Government Licence – British Columbia

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Drawn By: L. Powell

Projection: Transverse Mercator
Datum: North American 1983
Checked by: N. Bishop

Figure No.:
A2-31



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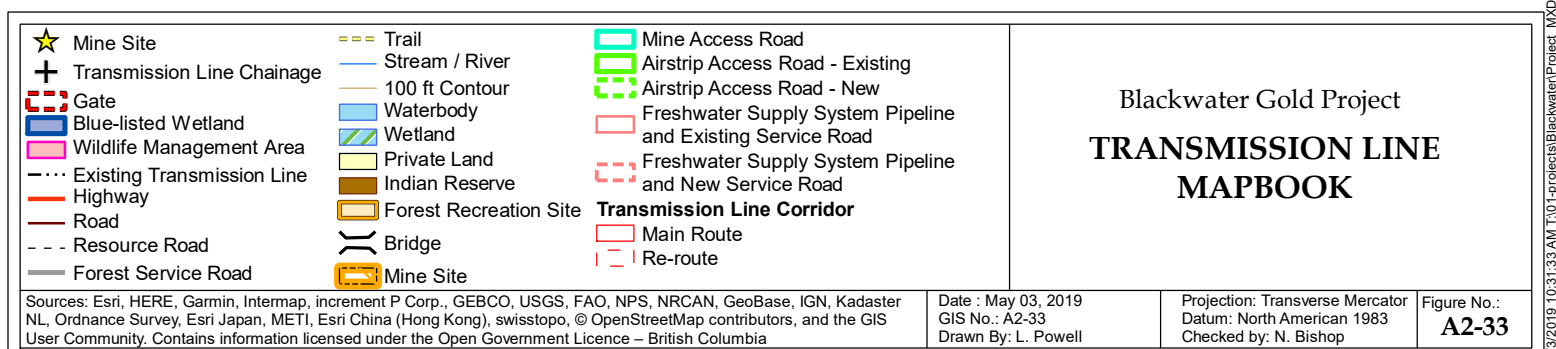
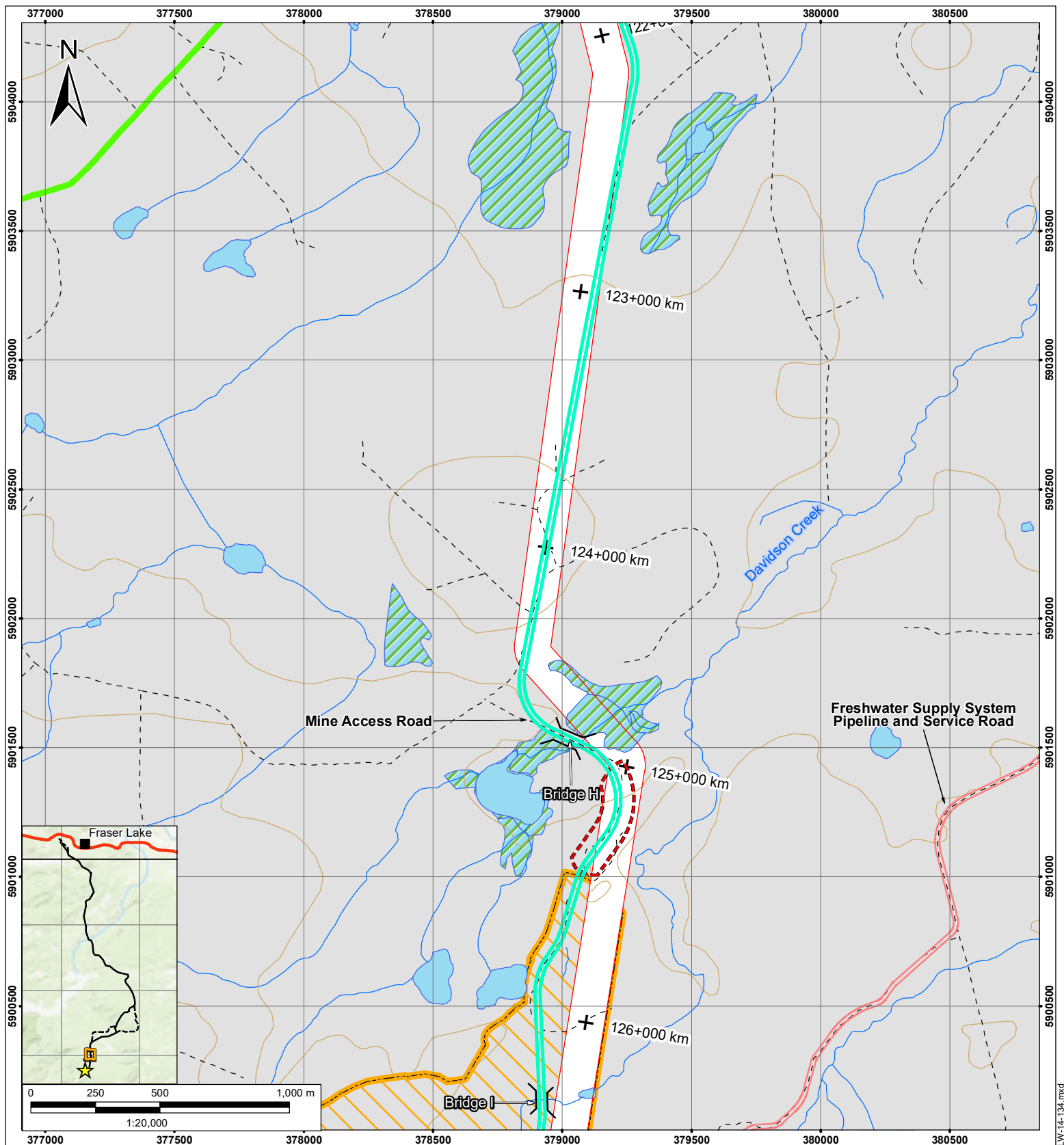
Blackwater Gold Project TRANSMISSION LINE MAPBOOK

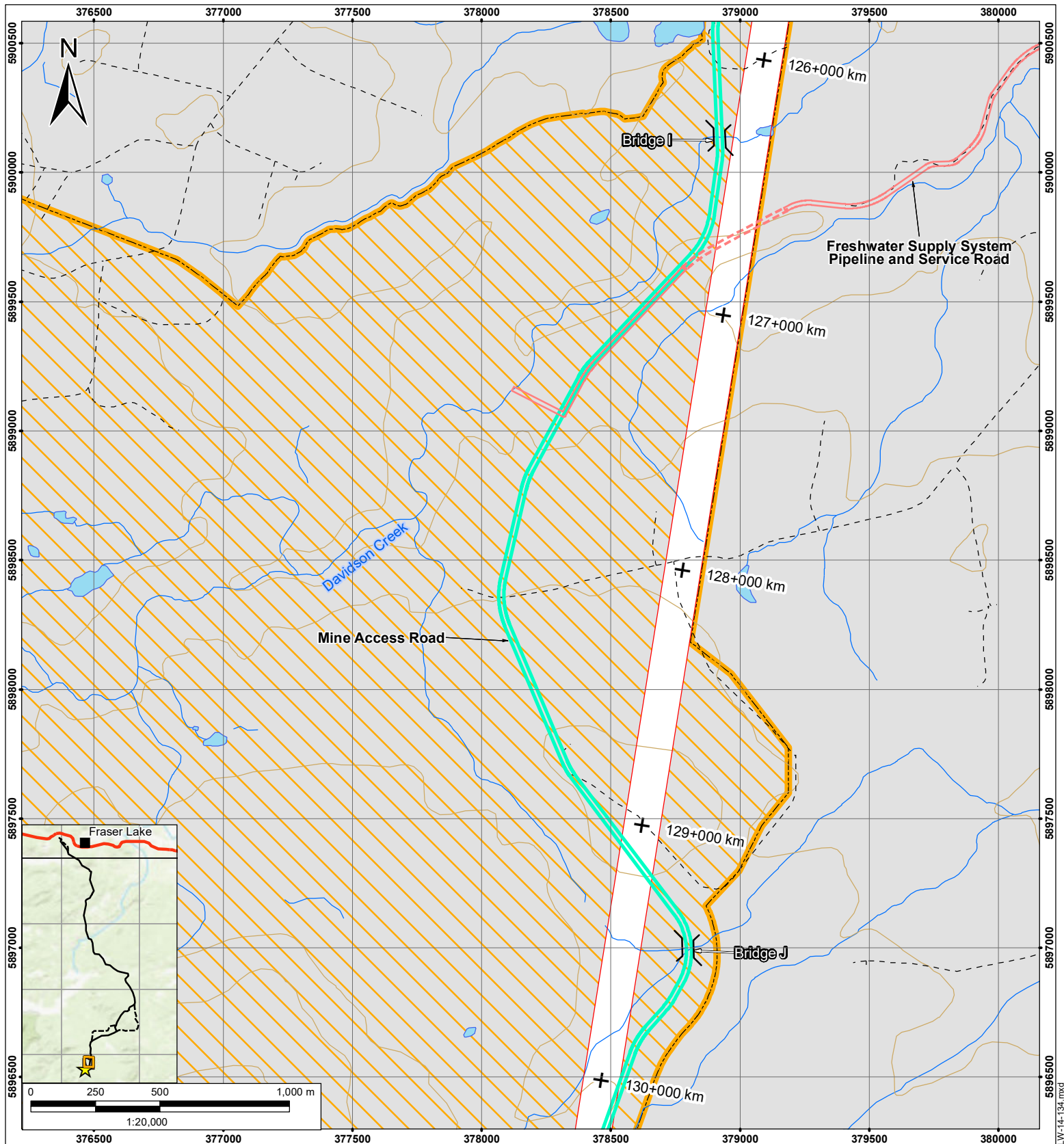
Sources: Esri, HERE, Garmin, Intermap, increment P Corp., GEBCO, USGS, FAO, NPS, NRCAN, GeoBase, IGN, Kadaster NL, Ordnance Survey, Esri Japan, METI, Esri China (Hong Kong), swisstopo, © OpenStreetMap contributors, and the GIS User Community. Contains information licensed under the Open Government Licence – British Columbia

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GIS No.: A2-32
Drawn By: L. Powell

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Figure No.:
A2-32





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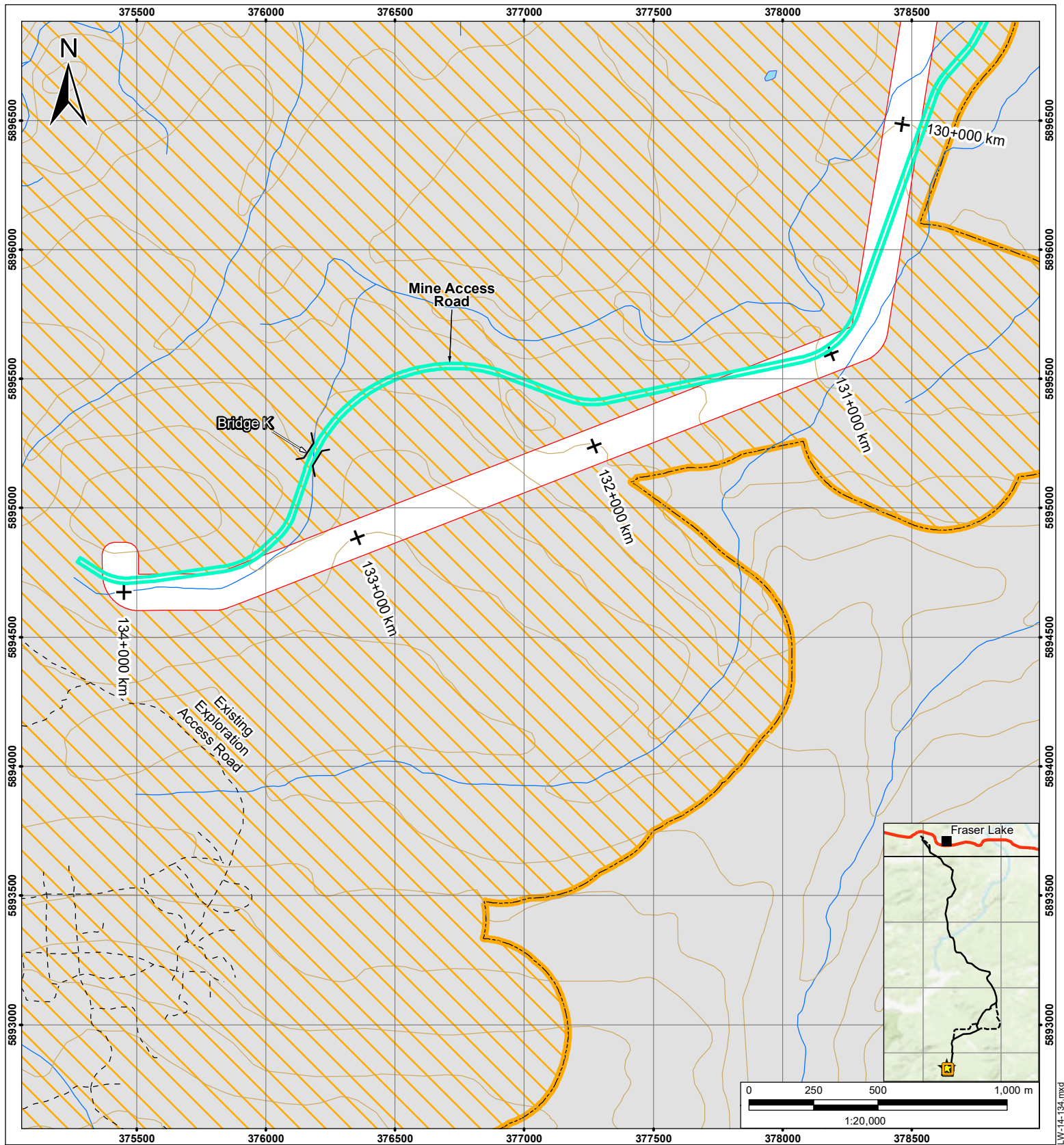
Blackwater Gold Project TRANSMISSION LINE MAPBOOK

Sources: Esri, HERE, Garmin, Intermap, increment P Corp., GEBCO, USGS, FAO, NPS, NRCAN, GeoBase, IGN, Kadaster NL, Ordnance Survey, Esri Japan, METI, Esri China (Hong Kong), swisstopo, © OpenStreetMap contributors, and the GIS User Community. Contains information licensed under the Open Government Licence – British Columbia

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Datum: North American 1983
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Figure No.:
A2-34



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|--------------------------------|--------------------------|---|
| ★ Mine Site | --- Trail | ▬ Mine Access Road |
| + Transmission Line Chainage | — Stream / River | ▬ Airstrip Access Road - Existing |
| ▬ Gate | — 100 ft Contour | ▬ Airstrip Access Road - New |
| ▬ Blue-listed Wetland | ▬ Waterbody | ▬ Freshwater Supply System Pipeline and Existing Service Road |
| ▬ Wildlife Management Area | ▬ Wetland | ▬ Freshwater Supply System Pipeline and New Service Road |
| --- Existing Transmission Line | ▬ Private Land | Transmission Line Corridor |
| ▬ Highway | ▬ Indian Reserve | ▬ Main Route |
| ▬ Road | ▬ Forest Recreation Site | ▬ Re-route |
| --- Resource Road | ▬ Bridge | |
| ▬ Forest Service Road | ▬ Mine Site | |

Blackwater Gold Project TRANSMISSION LINE MAPBOOK

Sources: Esri, HERE, Garmin, Intermap, increment P Corp., GEBCO, USGS, FAO, NPS, NRCAN, GeoBase, IGN, Kadaster NL, Ordnance Survey, Esri Japan, METI, Esri China (Hong Kong), swisstopo, © OpenStreetMap contributors, and the GIS User Community. Contains information licensed under the Open Government Licence – British Columbia

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GIS No.: A2-35
Drawn By: L. Powell

Projection: Transverse Mercator
Datum: North American 1983
Checked by: N. Bishop

Figure No.:
A2-35

Appendix F Detailed Project Interface with GTC #601039

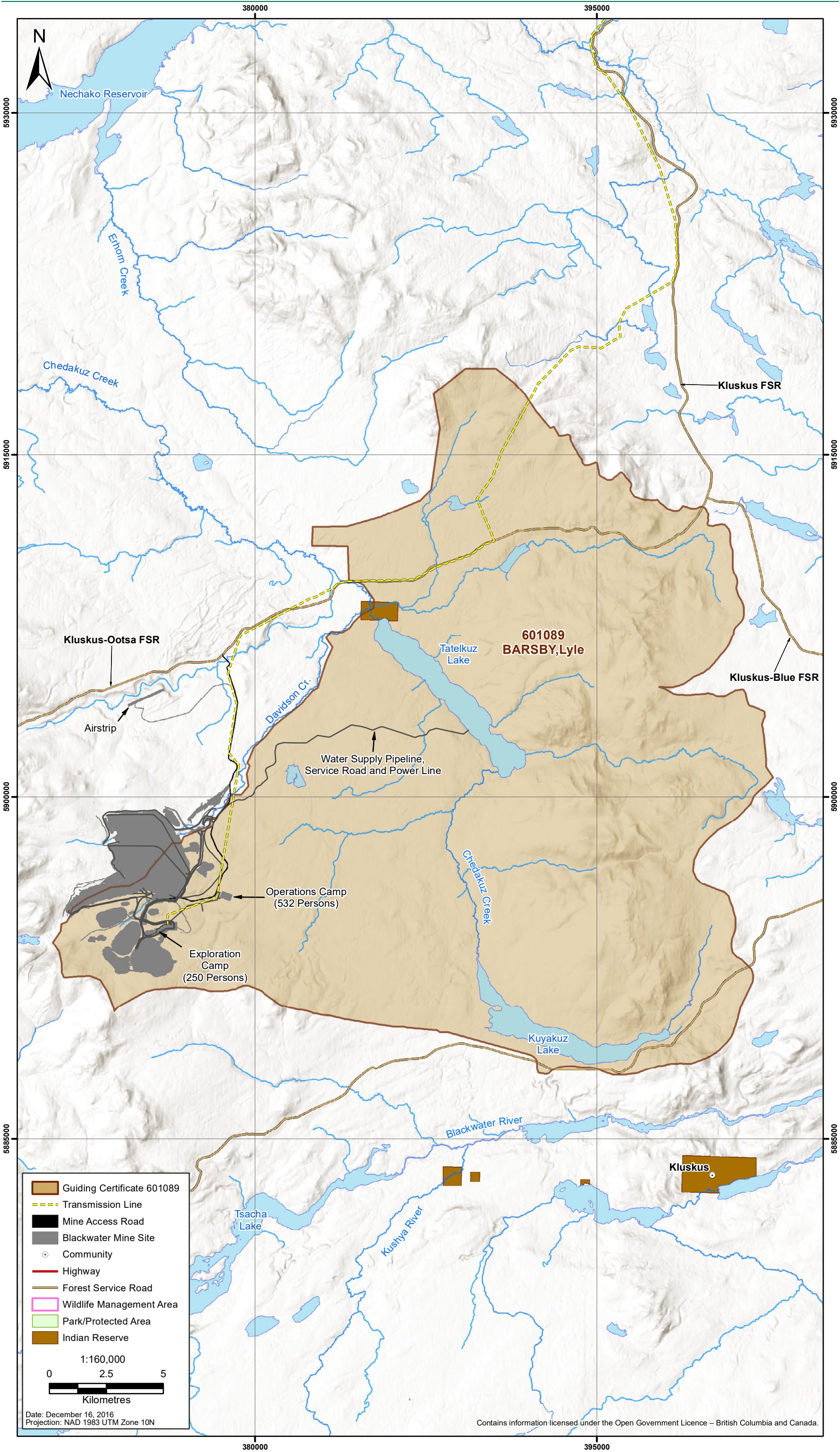


Figure F-1: Guide Outfitter Licence 601089 and the Blackwater Mine Site

Appendix G Condition 38 Engagement Detail

Appendix G: Condition 38 Engagement Detail

In April through July, 2021, the Certificate Holder and Tenure Holder exchanged verbal and written correspondence about the operation of the Tenure Holder's business in years' past, resulting in a without prejudice good faith offer from BW Gold which was rejected by the Tenure Holder in July 2021.

On September 3, 2021, BW Gold informed the Tenure Holder of the assignment of a Qualified Person to initiate Condition 38 planning and provided the Tenure Holder an engagement log between the Tenure Holder and the Certificate Holder from 2012 to 2016 in order to establish a joint knowledge of information previously shared with the BC EAO.

On September 10, 2021, BW Gold provided to the Tenure Holder a proposed approach and schedule to completing Condition 38 Engagement and key Condition 38 planning documents; A draft issues summary and mitigation matrix; an engagement log from January 2017 to date with a request to follow up with a telephone call to discuss the approach the following week.

The Tenure Holder's advisors responded that the Tenure Holders were away in their camp and unavailable for comment until the end of October and requested that the schedule be amended to account for dialogue to begin seven weeks later.

October 5, 2021: The Certificate Holder released a follow-up proposed engagement approach and schedule and suggested a telephone call the week of the Tenure Holder's return from camp to review the Condition 38 documents and discuss the engagement process.

October 27, 2021: The Tenure Holder released questions to the QP seeking clarification on the context of the September 10 Issues summary. The QP responded in writing on November 5 with detailed information and appendices with reference records to the past attempts to sell the business, past filings siting non-use of GTC 601, and the LRMP Access Management Plan, among other things.

October 28, 2021: A call was held with the Tenure Holders and a summary of the purpose of the previously sent Condition 38 supporting materials (Mitigation Matrix and Engagement Log) with a request to discuss the approach to engagement and receive written comments.

November 1, 2021: FLNRORD provided advice on the draft Mitigation Matrix.(FLNRORD 2021b)

November 10, 2021: A call was held with the Tenure Holders to support further understanding of the documents and provide an opportunity to discuss concerns, impacts and mitigations.

November 17, 2021: The Tenure holder provided written comment on the Mitigation Matrix and provided an alternative list of engagement activities back to 2012. The QP analyzed the Tenure Holder's 37 page call log, line by line against the September 10, 2021 Engagement log (2017 – To Date). As a result, the QP modified the Engagement Log (Appendix C of Condition 38 filed December 1, 2021) to incorporate exchanges from January 2016 and other relevant communications to which BW Gold or New Gold was a party.

November 22, 2021: BW Gold prepared a detailed letter at the Tenure Holder's request outlining the information that BW Gold did not have in its possession to further understand the past operations of the Tenure Holder. This was in direct response to repeated statements by the Tenure Holder that all information had been provided in the past (2016, 2018, 2021)

November 26, 2021: The QP responded to the Tenure Holder's November 17, 2021 comments with the observation of key themes and seeking to advance the process of how Batnuni can contribute further to the mitigation planning. A process was proposed going forward including updating the Mitigation Matrix and seeking the Tenure Holders confirmation of interest in advancing a communication protocol.

November 29, 2021: The Tenure Holder responded by providing some information and asserted concerns about the large footprint of the project, attempts to seek information are 'watering down' the impact, no attempt to reduce noise, light and industrial effects, increasing industrial traffic, lost opportunity for income when not operating.

November 30, 2021: QP released a response to FLNRORD's November 1, 2021 comments on the Mitigation Matrix table.

December 1, 2021: Draft Condition 38 and the updated Mitigation Matrix (Section 9 and formerly Appendix D) with responses to November 17 Tenure Holder comments and updated Engagement Record (Appendix C) with updates based on the Tenure Holder's log, were released with a request to meet to review the documents and discuss next steps. A meeting was set, which included the EAO, at the Tenure Holder's advisor's first available meeting date, December 22, 2021.

December 22, 2021: A virtual meeting occurred, and the Mitigation Matrix and responses were reviewed. A process for discussion of the Condition 38 draft was agreed, which included two meetings, January 21 and February 2. BW Gold sought to receive verbal and written feedback on the Condition 38 plan and the key Mitigation Matrix. EAO requested a written response by January 10, 2022.

January 21, 2022: A virtual meeting occurred with the Tenure Holder and the EAO and the Tenure Holder's incoming comments were shared on screen and opportunity made for further comment. The Parties discussed the requirement for continued engagement and how the process would demonstrate compliance with EAC Condition 4. EAO advised the report had not been approved and could be resubmitted by the Certificate Holder for approval, prior to March 1, 2022.

February 2, 2022: A virtual meeting occurred with the Tenure Holder and the EAO to discuss the process of updating the Condition 38, demonstrating how the Tenure Holder's views had been taken into account and if not, why not. EAO confirmed the Certificate Holder's process met the requirements of Condition 4. It was agreed to have a follow up meeting on February 14 to discuss the Project components and the Tenure Holders use in the area of the Project.

Approval Signature Record

Reviewer Role	Name	Signature	Date