March 8, 2019

Dear [Name]:

Re: Your request for access to information under Part II of the Access to Information and Protection of Privacy Act, 2015 [Our File #: MAE/026/2019]

On Feb 5, 2019, the Department of Municipal Affairs and Environment received your request for access to the following records/information:

“I am requesting access to all communications between this Department and a mining exploration company operating in Central Newfoundland, known as Marathon Gold Corporation - for the period covering all of this year (2019) to date.”

I am pleased to inform you that a decision has been made by the Deputy Minister for the Department of Municipal Affairs and Environment to provide access to some of the requested information.

However, certain text contained within the records has been refused in accordance with the following exceptions to disclosure, as specified in the Access to Information and Protection of Privacy Act, 2015 (the Act):

“40(1): The head of a public body shall refuse to disclose personal information to an applicant where the disclosure would be an unreasonable invasion of a third party’s personal privacy.”

As required by 8(2) of the Act, we have severed information that is unable to be disclosed and have provided you with as much information as possible. In accordance with your request for a copy of the records, the appropriate copies have been enclosed.

Please be advised that you may appeal this decision and ask the Information and Privacy Commissioner to review the decision to provide partial access to the requested information, as set out in section 42 of the Act (a copy of this section of the Act has been enclosed for your reference). A request to the Commissioner must be made in writing within 15 business days of the date of this letter or within a longer period that may be allowed by the Commissioner. Your appeal should identify your concerns with the request and why you are submitting the appeal.

The appeal may be addressed to the Information and Privacy Commissioner:

Office of the Information and Privacy Commissioner

P.O. Box 8700, St. John's, NL, Canada A1B 4J6  709 729 5677  709 729 0943  www.gov.nl.ca
You may also appeal directly to the Supreme Court Trial Division within 15 business days after you receive the decision of the public body, pursuant to section 52 of the Act (a copy of this section of the Act has been enclosed for your reference).

Please be advised that responsive records will be published following a 72 hour period after the response is sent electronically to you or five business days in the case where records are mailed to you. It is the goal to have the responsive records posted to the Completed Access to Information Requests website within one business day following the applicable period of time. Please note that requests for personal information will not be posted online.

If you have any further questions, please feel free to contact me by telephone at 709-729-7183 or by e-mail at ryancollins@gov.nl.ca.

Sincerely,

Ryan Collins
ATIPP Coordinator
Municipal Affairs and Environment

Enclosures
Access or correction complaint

42. (1) A person who makes a request under this Act for access to a record or for correction of personal information may file a complaint with the commissioner respecting a decision, act or failure to act of the head of the public body that relates to the request.

(2) A complaint under subsection (1) shall be filed in writing not later than 15 business days

(a) after the applicant is notified of the decision of the head of the public body, or the date of the act or failure to act; or

(b) after the date the head of the public body is considered to have refused the request under subsection 16(2).

(3) A third party informed under section 19 of a decision of the head of a public body to grant access to a record or part of a record in response to a request may file a complaint with the commissioner respecting that decision.

(4) A complaint under subsection (3) shall be filed in writing not later than 15 business days after the third party is informed of the decision of the head of the public body.

(5) The commissioner may allow a longer time period for the filing of a complaint under this section.

(6) A person or third party who has appealed directly to the Trial Division under subsection 52(1) or 53(1) shall not file a complaint with the commissioner.

(7) The commissioner shall refuse to investigate a complaint where an appeal has been commenced in the Trial Division.

(8) A complaint shall not be filed under this section with respect to

(a) a request that is disregarded under section 21;

(b) a decision respecting an extension of time under section 23;

(c) a variation of a procedure under section 24; or

(d) an estimate of costs or a decision not to waive a cost under section 26.

(9) The commissioner shall provide a copy of the complaint to the head of the public body concerned.
Direct appeal to Trial Division by an applicant

52.  (1) Where an applicant has made a request to a public body for access to a record or correction of personal information and has not filed a complaint with the commissioner under section 42, the applicant may appeal the decision, act or failure to act of the head of the public body that relates to the request directly to the Trial Division.

(2) An appeal shall be commenced under subsection (1) not later than 15 business days

(a) after the applicant is notified of the decision of the head of the public body, or the date of the act or failure to act; or

(b) after the date the head of the public body is considered to have refused the request under subsection 16(2).

(3) Where an applicant has filed a complaint with the commissioner under section 42 and the commissioner has refused to investigate the complaint, the applicant may commence an appeal in the Trial Division of the decision, act or failure to act of the head of the public body that relates to the request for access to a record or for correction of personal information.

(4) An appeal shall be commenced under subsection (3) not later than 15 business days after the applicant is notified of the commissioner's refusal under subsection 45(2).
Collins, Ryan

From: Sherry Dunsworth  
Sent: Friday, January 4, 2019 11:56 AM  
To: Mostofi, Shabnam  
Subject: Re: Approval E190001 for Marathon Gold Corp.

Thanks Shabnam.

Sherry

On Fri, Jan 4, 2019, 10:24 AM Mostofi, Shabnam, <ShabnamMostofi@gov.nl.ca> wrote:

Thanks Sherry for the confirmation.

Regards,

Shabnam

Shabnam Mostofi, M.Sc., M.Eng., EIT
Environmental Engineer
Water Rights, Investigations, and Modelling Section
Water Resources Management Division
Department of Municipal Affairs and Environment
Government of Newfoundland and Labrador

4th Floor, West Block, Confederation Building
PO Box 8700, St. John's, NL A1B 4J6
Phone: (709) 729-2657 Fax: (709) 729-0320
Email: ShabnamMostofi@gov.nl.ca
Hi Shabnam,

and will call you to discuss the project. In the meantime, we never drill or trench in water bodies and always stay the required distance from water bodies. We have in the past obtained the appropriate water crossing permits when dealing with access.

I look forward to chatting with you about the Valentine project but in the meantime there is no work we are currently planning to do in this 2019 exploration that requires additional water crossing permits and so should not hold up our 2019 water permit.

Regards, Sherry

On Fri, Jan 4, 2019, 9:46 AM Mostofi, Shabnam, <ShabnamMostofi@gov.nl.ca> wrote:

Hi Sherry,

We are reviewing your Water Use Licence application with regards to Valentine Lake Property.

I noticed that some of your proposed drilling and trenching areas are near or in water bodies.

Please note that you require to apply for Permit to Alter a Body of Water under Section 48 of the Water Resources Act, SNL 2002 cW-4.01 for any work that.

Permit application can be found here:

https://www.mae.gov.nl.ca/waterres/regulations/appforms/index.html

Regards,
Shabnam

Shabnam Mostofi, M.Sc., M.Eng., EIT
Environmental Engineer
Water Rights, Investigations, and Modelling Section
Water Resources Management Division
Department of Municipal Affairs and Environment
Government of Newfoundland and Labrador

4th Floor, West Block, Confederation Building
PO Box 8700, St. John's, NL A1B 4J6
Phone: (709) 729-2657  Fax: (709) 729-0320
Email: ShabnamMostofi@gov.nl.ca

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From: Sherry Dunsworth
Sent: Friday, December 14, 2018 12:12 PM
To: Mostofi, Shabnam <ShabnamMostofi@gov.nl.ca>
Cc: Snow, Matthew <MatthewSnow@gov.nl.ca>; Khan, Ali <akhan@gov.nl.ca>
Subject: Re: Approval E190001 for Marathon Gold Corp.

Hello Shabnam,

Please find attached the proof of payment for the Marathon Gold Corporation - 2019 WUL/P.

Please advise if anything else is required.

Thank you, Sherry
On Mon, Dec 10, 2018 at 11:00 AM Mostofi, Shabnam <ShabnamMostofi@gov.nl.ca> wrote:

Hi Sherry,

We are reviewing your Water Use Licence / Permit (WUL/P) with regards to Valentine Lake Property (Approval E190001).

Please submit WUL/P application fee **$400 plus HST** to the Central Cash.

Central Cash can be contacted via phone at (709) 729-3042 or (709) 729-3044. Please request them to send you the receipt via email.

After receiving the receipt, please forward the payment receipt to us so that we can issue/release your Water Use Licence/Permit.

Please note that If you need to cross any stream or water body to access the exploration site, you need to apply for a permit to install bridge, culvert or fording across the stream.

Regards,

Shabnam

Shabnam Mostofi, M.Sc., M.Eng., EIT

Environmental Engineer

Water Rights, Investigations, and Modelling Section

Water Resources Management Division

Department of Municipal Affairs and Environment

Government of Newfoundland and Labrador

4th Floor, West Block, Confederation Building
From: Snow, Matthew <MatthewSnow@gov.nl.ca>
Sent: Friday, December 7, 2018 4:14 PM
To: Sherry Dunsworth
Cc: Sheppard, Kevin <KevinSheppard@gov.nl.ca>; Drake, Martha <mdrake@gov.nl.ca>; Mercer, Delphina <dhmercer@gov.nl.ca>; Miller, Kirsten <KirstenMiller@gov.nl.ca>; Connolly, Krista <KristaConnolly@gov.nl.ca>; Mostofi, Shabnam <ShabnamMostofi@gov.nl.ca>; Angelopoulos, John <johnangelopoulos@gov.nl.ca>; Hefford, Brad <BradHefford@gov.nl.ca>
Subject: Approval E190001 for Marathon Gold Corp.

Sherry

Please see attached approval for the 2019 exploration program at Valentine Lake.

Cheers

Matthew Snow
Mineral Exploration Site Inspector
Mineral Lands Division
NL Department of Natural Resources
telephone (709) 729-5634, cell (709) 649-0970
matthewsnow@gov.nl.ca
P.O. Box 8700, 50 Elizabeth Avenue, St. John's A1B 4J7
December 7, 2018

E190001

Sherry Dunsworth
Marathon Gold Corp.
10 King Street E. Suite 501
Toronto, ON
M5C 1C3

Dear Sherry Dunsworth:

Exploration Approval (200 DDH, 40 Trenches,
Prospecting, Geochemical Survey, Ground Geophysics, Fuel Storage) for
Marathon Gold Corp. on the
Valentine Lake Property, NTS
12A/06, 12A/07, Licences
010899M, 010943M,
013809M, 013810M,
017230M, 017231M,
018687M, 018686M,
016740M, 019443M,
019444M, 019628M,
020482M, 022477M:

Your proposed exploration program submitted in compliance with Section 5(4) of the
Mineral Act has been reviewed and approved.
The following conditions apply:

1. The Proponent, its employees, agents and subcontractors ("Proponent") shall comply with
   the Mineral Regulations, in particular sections 41 – 45. The Mineral Regulations can be read
   at: http://assembly.nl.ca/legislation/sr/regulations/rc961143.htm

2. This approval may be cancelled or suspended by the Minister if the Proponent fails to comply
   with any condition in this approval or as a result of a failure to comply with the Mineral Act,
   Mineral Regulations or any other provincial law or regulation. Upon cancellation or
   suspension of this approval the Proponent shall immediately cease all exploration activities.

3. The Proponent shall comply with any other Provincial and Federal act or regulation, and
   obtain all permits that may be required in connection with the exploration activity.

4. As required by Section 42 of the Mineral Regulations, the Proponent shall notify the Mineral

Natural Resources Building, 50 Elizabeth Avenue, P.O. Box 8700, St. John's, NL, Canada, A1B 4J6,
Facsimile (709) 729-6782 http://www.nr.gov.nl.ca/nr/
Lands Division of any significant changes to the approved exploration plan, and shall not proceed with exploration work, preparatory work or site access that deviates substantially from the approved exploration plan or deviates from the approved exploration plan in a manner which may significantly impact the environment without first receiving written authorization from the Mineral Lands Division.

5. The Proponent shall provide the Mineral Lands Division with:
   a) a brief notice immediately before beginning the work;
   b) a brief update of the status of the exploration program when it is completed.
Notices and updates should be sent to exploration_approval@gov.nl.ca

6. At any time the Mineral Lands Division may issue a request for information regarding completed, ongoing or planned exploration and the Proponent agrees to abide by all such requests without undue delay. The information requested may include but is not limited to: the location of exploration sites (including access trails), site preparation methods, the status of rehabilitation and cleanup, and photographic documentation of site conditions.

7. If exploration work is to take place on lands not vested in the Crown, as per section 12(2) of the Mineral Act, the licencsee shall obtain prior written permission and forward copies to the Mineral Lands Division.

8. Exploration work, including traditional prospecting, shall not be carried out on ground for which the mineral rights are held by another party unless permitted by an agreement registered with the Mineral Claims Recorder’s office or unless written permission from the other party has been forwarded to the Mineral Lands Division. The Department’s Geoscience Atlas is a current map of mineral rights held in the province. The Geoscience Atlas is located at: [http://gis.geosurv.gov.nl.ca/](http://gis.geosurv.gov.nl.ca/)

9. The Proponent shall ensure that all waste materials are placed in suitable refuse containers without undue delay and removed to a waste disposal site approved by Service NL to accept the type(s) of waste being disposed of. Service NL Government Service Centres are listed at: [http://www.servicenl.gov.nl.ca/departments/contact.html#locations](http://www.servicenl.gov.nl.ca/departments/contact.html#locations)

10. The Proponent is advised of Section 45(1)(a) of the Mineral Regulations which requires that trenches and test pits are rehabilitated before the end of the exploration season in which they are excavated. Trench rehabilitation as per Section 45(1)(a) requires that the trench be backfilled and the original organic cover (topsoil, ground vegetation, and any trees not used for other purposes) be spread back over the backfilled site. If the original organic cover proves insufficient to completely re-cover the site then an organic substitute material must be used in addition to complete the process, provided that no invasive species are introduced. Acceptable substitute materials are straw, hay, trees having been cut in other parts of the exploration project area, or ground vegetation produced by hydoseeding. If the Proponent wishes to keep one or more trenches open beyond the expiry date of the approval then application must be made to the Mineral Lands Division, a security deposit posted, and approval issued by the department. Note that for the purposes of the Mineral Act “trench” is defined as any not insignificant excavation, however shallow or broad, for the purpose of studying or sampling the underlying bedrock, till, or soil.

11. The Proponent is advised of Section 45(2) of the Mineral Regulations which requires that all sites cleared of topsoil (e.g. drill pads prepared by cut-and-fill, grubbed sections of access
trail, laydown areas, camp sites) be rehabilitated before the end of the current exploration program. Rehabilitation as per Section 45(2) requires that the site be re-contoured and the original organic cover (topsoil, ground vegetation, and any trees not used for other purposes) be spread back over the re-contoured site. If the original organic cover proves insufficient to completely re-cover the site then an organic substitute material must be used in addition to complete the process, provided that no invasive species are introduced. Acceptable substitute materials are straw, hay, trees having been cut in other parts of the exploration project area, or ground vegetation produced by hydoseeding. If the Proponent wishes to keep drill casing above ground then the re-contouring may accommodate this. Sumps pits and borrow pits fall under Section 45(1)(a) of the Mineral Regulations and need to be rehabilitated before the end of the exploration season in which they are excavated.

12. The Proponent shall not permit drilling discharge waters to flow overland into a water body, including into a small stream or intermittent channel, irrespective of whether the water body is displayed on the 1:50,000 scale NTS map. More specifically, waterborne drill cuttings and drill additives shall not be permitted to enter a water body.

13. All water pumps shall be underlain by a drip tray lined with absorbent pads and the pads shall be changed before becoming saturated. Drip trays where the containment rim is broken must be replaced or placed in secondary containment (e.g. a tarp-lined wooden tray) without delay.

14. Drill casings producing water in any quantity shall be sealed (grouted) before the expiry of the exploration approval and capped in the meantime. The drill holes shall be sealed with high-swelling bentonite or cement; however coarse sand may be used to fill the lower portions of the hole. Capping is not a substitute for sealing, since many caps cannot fully stop the water and, in any case, the caps with inevitably break due to freezing and thawing.

15. Immediately after demobilization from a drill site, the site shall be inspected for spills of hydraulic oil or fuel, deposits of drill grease, garbage, and waste equipment and these shall be cleaned up in their entirety without delay. The Proponent shall excavate deep enough to retrieve all of the contaminated soil. Soil contaminated by hydraulic oil or fuel shall be excavated and disposed of at an approved waste disposal site. The Proponent shall contact the nearest Government Service Centre to find out the location of the nearest approved waste disposal site accepting the materials that have been cleaned up. Government Service Centres are listed at: http://www.servicenl.gov.nl.ca/department/contact.html#locations

16. The Proponent shall screen any water intakes or outlet pipes to prevent entrainment or impingement of fish. Entrainment occurs when a fish is drawn into a water intake and cannot escape. Impingement occurs when an entrapped fish is held in contact with the intake screen and is unable to free itself.

17. In freshwater, the Proponent shall follow these measures for design and installation of intake end of pipe fish screens to protect fish where water is extracted from fish-bearing waters:

- Screens should be located in areas and depths of water with low concentrations of fish throughout the year.
- Screens should be located away from natural or artificial structures that may attract fish that are migrating, spawning, or in rearing habitat.
- 4 -

- The screen face should be oriented in the same direction as the flow.
- Ensure openings in the guides and seals are less than the opening criteria to make “fish tight”.
- Screens should be located a minimum of 300 mm (12 in.) above the bottom of the watercourse to prevent entrapment of sediment and aquatic organisms associated with the bottom area.
- Structural support should be provided to the screen panels to prevent sagging and collapse of the screen.
- Large cylindrical and box-type screens should have a manifold installed in them to ensure even water velocity distribution across the screen surface. The ends of the structure should be made out of solid materials and the end of the manifold capped.
- Ensure regular maintenance of screens is carried out to prevent impingement of fish.
- Pumps should be shut down when fish screens are removed for inspection and cleaning. If this is not possible, a secondary intake should be available.

18. The Proponent is advised that exploration sites (including drill sites, trenches, test pits, and sections of access trail) associated with ground disturbance and located close to open water bodies or watercourses fall under Section 45(1)(b) of the Mineral Regulations as a site that could cause sedimentation into a nearby water body. The Proponent is required to actively ensure that any sedimentation generated from the site does not enter the water body or watercourse. Some combination of erosion prevention and sedimentation control shall be used to meet this requirement.

19. The Proponent’s use of existing forest access roads must not impede access for other resource users, and any forest access roads used must be left in the condition found prior to the Proponent’s exploration activity with any rehabilitation required to be undertaken as a result of the exploration activity to be at the expense of Proponent.

20. Petroleum product spills into or near a water body and petroleum product spills greater than 70 litres (or of an uncertain volume) on land must be reported without delay to Service NL by calling the Environmental Emergency 24-hour line at 772-2083 or 1-800-563-9089. In order to ensure that a quick and effective response to a spill event is possible, spill response equipment and absorbent materials should be readily available on-site.

21. The Proponent shall wash, refuel and service machinery and store fuel and other materials for the machinery in such a way as to prevent any deleterious substances from entering the water. Water depths should not submerge axle or differential vents.

22. The Environmental Assessment Division has reviewed the proposed activities and advises that registration for Environmental Assessment is not required with the understanding that the surface vegetation along the temporary trails will be left intact and that the routes will be for one time use only. Should this not be the case, the Proponent shall contact the Mineral Lands Division as soon as possible for review of any proposed changes.

23. If the exploration activity includes stream crossings and/or fording, the Proponent shall contact the Water Resources Management Division to obtain a Permit to Alter a Water Body.

24. The Proponent shall abide by the conditions contained in its Water Use Licence/Permit (WUL-XX-XXX) which are broad in scope towards protecting bodies of water. Upon receipt of
the WUL/P, the Notification of Acceptance of Water Use Licence/Permit form must be signed and returned to the Water Rights, Investigations and Modelling Section of the Department of Municipal Affairs and Environment within thirty (30) days in order for the WUL/P to be valid. In addition, a water use report (“Appendix B”) must be completed and filed annually within thirty (30) days of the completion of the year's mineral exploration activities.

The proponent must apply for and obtain a permit under the Water Resources Act, 2002, specifically Section 48 http://assembly.nl.ca/Legislation/sr/statutes/w04-01.htm for any work in any body of water (including wetland) prior to the start of construction.

25. The Proponent shall comply with the Forestry Act and regulations. The Proponent is advised to contact the nearest office of the Forest Services Branch to obtain the following permits as required:
   a. a cutting permit before the start of the exploration program if trees have to be cut for access to exploration sites. Please note that it may take up to two weeks to receive this permit;
   b. an operating permit if operations are to take place on forest land during the forest fire season (May-September);

26. The applicant is to use existing access within the site applied for and to avoid any Per-Commercial Thinning areas. In addition, where trenching is to occur, the site must be restored to natural conditions upon completion of the project.

27. Crown Lands Branch of the Land Management Division has no concerns with this mineral exploration application, however, the proponent should be aware that there are numerous applications and issued titles for cottages throughout the exploration area. If necessary the applicant may wish to contact the Central (256-1400) and Western (637-3291) Crown Lands Regional Offices for positional information on these titles

28. The exploration program is taking place within an 8 km buffer surrounding an outfitters’ camp. It is recommended that the Proponent take this into consideration when planning exploration activities, and coordinate with the outfitter to avoid detrimental impacts on respective activities. Their contact information is:

1. Leonard McCarthy of Caribou Cove Outfitters Ltd. (Moose Lodge is 6.5 km from boundary), 468 Rocky Lake Drive, Bedford, NS, B4A 2T6, Tel: 902-209-0099, Fax: 902-455-0775, Email: fiveestar@fivestarroofing.ns.ca
2. Randy Parsons of Notch Mountain Outfitters Inc. (Valentine Lake Lodge is inside boundary), P.O. Box 462, Buchans, NL, A0H 1G0, Tel: 709-672-3589/8607, Fax: 709-672-3843, Email: randyparsons2004@hotmail.com, Website: www.notchmountainoutfitters.com
3. Everett/Marilyn Kinden of Kinden’s Quinn Lake Outfitters Ltd. (Quinn Lake Lodge is 5.3 km from boundary), P.O. Box 787, 46 Centennial Drive, Lewisporte, NL, A0G 3A0, Tel: 709-535-8811/541-1340, Fax: 709-535-1928, Email: info@kindensoutfitters.com, Website: www.kindensoutfitters.com
4. Dave Evans of Victoria Outfitters Ltd. (Victoria Lodge), 6 Birmingham Street, St. John’s, NL, A1E 5C8, Tel: 709-745-1048/293-0534, Fax: 709-745-5452, Email: devans@victoriaoutfitters.com, Website: www.victoriaoutfitters.com
29. The Fisheries Act requires that projects avoid causing serious harm to fish unless authorized by the Minister of Fisheries and Oceans Canada. This applies to work being conducted in or near waterbodies that support fish that are part of or that support a commercial, recreational or Aboriginal fishery. If this exploration work is to take place in or near a waterbody, please complete the Department of Fisheries and Oceans (DFO) Self-Assessment at: [link](http://www.dfo-mpo.gtc.ca/pnw-ppe/index-eng.html).

30. As per Section 38 (5) of the Fisheries Act, every person has a duty to notify DFO of an occurrence that results in serious harm to fish, or the deposit of a deleterious substance in water frequented by fish. Should such an occurrence take place, the Proponent shall contact DFO at 709-772-4140 or [FPP-NL@dfo-mpo.gc.ca](mailto:FPP-NL@dfo-mpo.gc.ca).

31. Please be advised on the provisions of the *Historic Resources Act*, protecting archaeological sites, artifacts and significant fossils, and procedures to be followed in the event that either are found:
   a. A person who discovers an archaeological object or significant fossil in, on or forming part of the land within the province shall report the discovery forthwith to the Minister (responsible for the *Historic Resources Act*) stating the nature of the object, the location where it was discovered and the date of discovery;
   b. No person other than one to whom a permit has been issued under this Act, who discovers an archaeological object or significant fossil shall move, destroy, damage, deface, obliterate, alter, add to, mark or in any other way interfere with, remove or cause to be removed from the province that object or fossil;
   c. The property in all archaeological objects or significant fossils found in, on or taken from the land within the province, whether or not these objects or fossils are in possession of the Crown is vested in the Crown;

   Should any archaeological remains be encountered, such as stone, bone or iron tools, concentrations of bone, charcoal or burned rock, fireplaces, house pits and/or foundations, activity in the area of the find must cease immediately and contact should be made with the Provincial Archaeologist in St. John’s (709-729-2462) as soon as possible.

   Copies of the *Historic Resources Act* and information on archaeology in the province may be obtained from the Provincial Archaeology Office upon request.

32. The Wildlife Division advises applicant to operate under established regulations and guidelines with respect to wildlife and its habitat to minimize additional impacts (in particular Sections 106 a) of the *Wild Life Regulations* under the *Wild Life Act* (O.C. 96-809): [link](http://www.env.gov.nl.ca/env/wildlife/index.html).

   Pursuant to Section 106 of the *Wild Life Regulations*:
   a. A person shall not operate an aircraft, motor vehicle, vessel, snow machine or all-terrain vehicle in a manner that will harass any wildlife;
   b. You are advised that helicopter supported exploration programs must be conducted in a manner that does not disturb, harass or harm any animal life that you encounter. This can easily be accomplished by avoiding concentrations of wildlife by rescheduling the planned activities for another day.
   c. Under no circumstances should nesting raptors be approached, not even for a “harmless” look. The startling effect that helicopters have on nesting raptors can be detrimental and therefore either a 600 m horizontal buffer from cliff faces or an altitude of 300 m must be observed.
The property is located within Newfoundland Marten critical habitat. Newfoundland Marten are listed as Threatened under the Newfoundland and Labrador Endangered Species Act (NLESA). Section 16 (1) of NLESA states, “A person shall not disturb, harass, injure, or kill an individual of a species designated as threatened, endangered, or extirpated”. Denning of female martens and young occurs from early April to the end of June and dens must be protected from damage and disturbance during this time period as dens are protected under the provincial NL Endangered Species Act and the federal Species at Risk Act.

The proposed activities also take place within important waterfowl habitat. Any efforts must be taken by the contractor/ground personnel to avoid additional stress on waterfowls (e.g. noise from equipment, ATVs, helicopter etc.), especially during the brood rearing, breeding & staging periods, which run approx. from April to early July on the Island of Newfoundland.

The Wildlife Division requires a minimum 50 m naturally vegetated buffer to be maintained along all waterbodies and wetlands to protect sensitive riparian and aquatic species, and their habitat.

No vegetation clearing is to occur within 800 metres of a bald eagle or osprey nest during the nesting season (March 15 to July 31) and 200 metres during the remainder of the year. The 200m buffer also applies to all other raptor nests (e.g. Northern Goshawk, Sharp-shinned Hawk, Merlin, American Kestrel, Great-horned Owl, Boreal Owl, Northern Saw-whet Owl). The location of any raptor nest site must be reported to the Wildlife Division.

The proponent must follow appropriate hunting and trapping protocols as set in the annual Hunting and Trapping Guide. Proponents are advised to develop and implement appropriate preventative and mitigation measures to avoid incidental take of wildlife species.

The Migratory Birds Convention Act, 1994, Migratory Bird Regulations, Wild Life Act and Wild Life Regulations protect birds and prohibit the disturbance or destruction of bird nests and eggs in Newfoundland & Labrador. Proponents are advised to develop and implement appropriate preventative and mitigation measures to avoid incidental take of birds, nests and eggs.

This approval is due to expire on December 7, 2019.

If you have any questions concerning this approval, please contact the undersigned at 729-6408 or heatherrafuse@gov.nl.ca.

Regards,

Heather Rafuse,
Exploration Approvals Geologist

Natural Resources Building, 50 Elizabeth Avenue, P.O. Box 8700, St. John's, NL, Canada, A1B 4J6,
Facsimile (709) 729-6782 http://www.nr.gov.nl.ca/nr/
Official Receipt

Official Receipt #: 8000QD4Y  Payment Date: 2018-12-14

SHERRY DUNSWORTH
WUL-E190001

Method of Payment: Visa
Payment Number: 1439

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<th>Item</th>
<th>Amount</th>
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<td>$400.00</td>
<td>HST</td>
<td>$60.00</td>
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</table>

Sub Total: $400.00 CAD
Tax Total: $60.00 CAD
Total: $460.00 CAD

Issued under authority of: Department of Finance
Expenditure and Revenue Control
PO Box 8700
St. John's NL
A1B 4J6
709-729-3042

For inquiries please contact: Revenue Control
709-729-3042
cs-receivables@gov.nl.ca

ATIPP 16
APPLICATION ACKNOWLEDGMENT
Exploration Referral

Heather Rafuse
Exploration Approvals and Land Use Geologist
Department of Natural Resources
50 Elizabeth Avenue
P.O. Box 8700
St. John's, NL A1B 4J7

Your File: E190001
Our File: 339194
Date: November 22, 2018

RE: Marathon Gold Corporation – Exploration – Valentine Lake Property

The Government Service Centre has no objections to this proposal provided the following stipulations are adhered to:

Waste

1. All waste material is to be placed in suitable refuse containers and removed to an approved waste disposal site, with the approval of the Service NL and site owner/operator.

2. Any cut brush should be chipped /shredded, burnt on-site or removed to an approved waste disposal site for burning with the approval of the Forestry Division, Department of Fisheries and Land Resources and/or the owner/operator of the waste disposal site.

3. Tires and used or waste oil is not to be used to aid in the burning of brush.

Gasoline and Associated Products

1. Any proposed fuel cache will require approval by the Government Service Centre prior to installation.

2. All fuel storage tank system installations other than those connected to a heating appliance of a capacity of 2,500 litres or less are subject to the Storage and Handling of Gasoline and Associated Products Regulations and will require approval by the Government Service Centre prior to installation.

3. The storage, handling and disposal of used and or waste oil must be in compliance with the Used Oil Control Regulations.

4. In order to ensure that a quick and effective response to a spill event is possible, spill response equipment should be readily available on-site. Response equipment, such as absorbents and open-ended barrels for collection of clean-up debris, should be stored in an accessible location on-site. Personnel working on the project should be knowledgeable about response procedures. The proponent should consider developing a contingency plan specific to the proposed undertaking to enable a quick and effective response to a spill event.

5. Any spill or leak of gasoline or associated product is to be reported immediately to Service NL by calling the Canadian Coast Guard Environmental Emergency line at 1-800-653-9089.

Other

1. If at any time this operation is deemed to be creating environmental problems, corrective action will have to be taken by the owner/operator, as directed by the Government Service Centre and/or the Department of Environment and Conservation.
Thank you Shabnam. Confirming no drilling in water bodies as per previous e-mail.

Regards, Sherry

On Mon, Jan 14, 2019, 8:35 AM Mostofi, Shabnam <ShabnamMostofi@gov.nl.ca> wrote:

Hi Sherry,

With your confirmation that no drilling will be taken place in water bodies, your Water Use Licence is ready to be issued.

I will email you a copy when it is signed off.

Regards,

Shabnam

Shabnam Mostofi, M.Sc., M.Eng., EIT
Environmental Engineer
Water Rights, Investigations, and Modelling Section
Water Resources Management Division
Department of Municipal Affairs and Environment
Government of Newfoundland and Labrador

4th Floor, West Block, Confederation Building
PO Box 8700, St. John's, NL A1B 4J6
Phone: (709) 729-2657 Fax: (709) 729-0320
Email: ShabnamMostofi@gov.nl.ca

From: Sherry Dunworth
Sent: Sunday, January 13, 2019 12:29 AM
To: Mostofi, Shabnam <ShabnamMostofi@gov.nl.ca>
Subject: Re: Approval E190001 for Marathon Gold Corp.

Hello Shabnam,

I wanted to touch base with you again and make sure there are no issues with the Marathon Gold Corporation - Water Usage permitting for 2019.

Is there any additional information required by your department?

Thank you, Sherry

On Fri, Jan 4, 2019 at 11:54 AM Mostofi, Shabnam <ShabnamMostofi@gov.nl.ca> wrote:

Thanks Sherry for the confirmation.

Regards,

Shabnam

Shabnam Mostofi, M.Sc., M.Eng., EIT
Environmental Engineer
Water Rights, Investigations, and Modelling Section
Water Resources Management Division
Department of Municipal Affairs and Environment
From: Sherry Dunsworth  
Sent: Friday, January 4, 2019 11:25 AM  
To: Mostofi, Shabnam <ShabnamMostofi@gov.nl.ca>  
Cc: Khan, Ali <akhan@gov.nl.ca>  
Subject: Re: Approval E190001 for Marathon Gold Corp.

Hi Shabnam,

I have already spoken to the project manager and will call you to discuss the project. In the meantime, we never drill or trench in water bodies and always stay the required distance from water bodies. We have in the past obtained the appropriate water crossing permits when dealing with access.

I look forward to chatting with you about the Valentine project but in the meantime there is no work we are currently planning to do in this 2019 exploration that requires additional water crossing permits and so should not hold up our 2019 water permit.

Regards, Sherry

On Fri, Jan 4, 2019, 9:46 AM Mostofi, Shabnam, <ShabnamMostofi@gov.nl.ca> wrote:

Hi Sherry,

We are reviewing your Water Use Licence application with regards to Valentine Lake Property.
I noticed that some of your proposed drilling and trenching areas are near or in water bodies.

Please note that you require to apply for Permit to Alter a Body of Water under Section 48 of the Water Resources Act, SNL 2002 cW-4.01 for any work th.

Permit application can be find here:

https://www.mae.gov.nl.ca/waterres/regulations/appforms/index.html

Regards,

Shabnam

Shabnam Mostofi, M.Sc., M.Eng., EIT
Environmental Engineer
Water Rights, Investigations, and Modelling Section
Water Resources Management Division
Department of Municipal Affairs and Environment
Government of Newfoundland and Labrador

4th Floor, West Block, Confederation Building
PO Box 8700, St. John’s, NL A1B 4J6
Phone: (709) 729-2657 Fax: (709) 729-0320
Email: ShabnamMostofi@gov.nl.ca

From: Sherry Dunsworth <Sherry.Dunsworth@gov.nl.ca>
Sent: Friday, December 14, 2018 12:12 PM
To: Mostofi, Shabnam <ShabnamMostofi@gov.nl.ca>
Cc: Snow, Matthew <MatthewSnow@gov.nl.ca>; Khan, Ali <akhan@gov.nl.ca>
Subject: Re: Approval E190001 for Marathon Gold Corp.
Hello Shabnam,

Please find attached the proof of payment for the Marathon Gold Corporation - 2019 WUL/P.

Please advise if anything else is required.

Thank you, Sherry

On Mon, Dec 10, 2018 at 11:00 AM Mostofi, Shabnam <ShabnamMostofi@gov.nl.ca> wrote:

Hi Sherry,

We are reviewing your Water Use Licence / Permit (WUL/P) with regards to Valentine Lake Property (Approval E190001).

Please submit WUL/P application fee $400 plus HST to the Central Cash.

Central Cash can be contacted via phone at (709) 729-3042 or (709) 729-3044. Please request them to send you the receipt via email.

After receiving the receipt, please forward the payment receipt to us so that we can issue/release your Water Use Licence/Permit.

Please note that If you need to cross any stream or water body to access the exploration site, you need to apply for a permit to install bridge, culvert or fording across the stream.

Regards,
Shabnam
From: Snow, Matthew <MatthewSnow@gov.nl.ca>
Sent: Friday, December 7, 2018 4:14 PM
To: Sherry Dunsworth; SherryDunsworth@gov.nl.ca
Cc: Sheppard, Kevin <KevinSheppard@gov.nl.ca>; Drake, Martha <mdrake@gov.nl.ca>; Mercer, Delphina <dhmercer@gov.nl.ca>; Miller, Kirsten <KirstenMiller@gov.nl.ca>; Connolly, Krista <KristaConnolly@gov.nl.ca>; Mostofi, Shabnam <ShabnamMostofi@gov.nl.ca>; Angelopoulos, John <johnangelopoulos@gov.nl.ca>; Hefford, Brad <BradHefford@gov.nl.ca>
Subject: Approval E190001 for Marathon Gold Corp.

Sherry

Please see attached approval for the 2019 exploration program at Valentine Lake.

Cheers

Matthew Snow
Hi Susan,

It would be better to be able to project to screen for sure, I’m good with 3:30 if that works for you.

Thanks,
Jamie

---

From: Squires, Susan <SusanSquires@gov.nl.ca>
Sent: January 16, 2019 3:39 PM
To: James Powell <jpowell@marathon-gold.com>
Subject: RE: Marathon Gold

Jamie,

The only boardroom available here on Tuesday afternoon at 2pm does not have a computer/projector. Is that needed? If not we can go ahead for 2pm.

If you prefer to be able to display something on the screen we could book it for 3:30pm.

Thanks,
Susan

---

Susan Squires, Ph.D.
Director
Environmental Assessment Division
Department of Municipal Affairs and Environment
Government of Newfoundland and Labrador
709-729-0673
susanquires@gov.nl.ca

---

From: James Powell <jpowell@marathon-gold.com>
Sent: Wednesday, January 16, 2019 3:17 PM
To: Squires, Susan <SusanSquires@gov.nl.ca>
Subject: RE: Marathon Gold

Thanks Susan. I agree with respect to bringing in other members of your team. Initially I’m looking to keep things simple and want to talk just about the EA component with you folks. We are planning to have a larger scale consultation a little later, inviting all regulators to a presentation of the project and question/answer session. In addition, I plan to meet with most groups individually to discuss specific items that may be of interest.

Will Tuesday afternoon, say 2 pm work on your end?
Cheers,
Jamie
From: Squires, Susan <SusanSquires@gov.nl.ca>
Sent: January 16, 2019 3:08 PM
To: James Powell <jpowell@marathon-gold.com>
Subject: RE: Marathon Gold

Jamie,

Thank you and congratulations on your new position with Marathon Gold!

It would be great to connect and discuss the current status of the project. It might be prudent to have myself and two of the Environmental Scientists participate so we can rebuild a knowledge base about Marathon within the Division. Are there any other regulators that would be helpful to pull in at this point (e.g. Water Resources, Natural Resources, Fisheries and Land Resources)?

Did you have a date or time in mind? Monday of next week is filling up for me, but the rest of the week has some flexibility.

Kind regards,
Susan
---
Susan Squires, Ph.D.
Director
Environmental Assessment Division
Department of Municipal Affairs and Environment
Government of Newfoundland and Labrador
709-729-0673
susansquires@gov.nl.ca

From: James Powell <jpowell@marathon-gold.com>
Sent: Wednesday, January 16, 2019 2:20 PM
To: Squires, Susan <SusanSquires@gov.nl.ca>
Subject: Marathon Gold

Hi Susan,

It’s been a little while since we spoke last, and I was trying to touch base by phone first and been unsuccessful over the past week. I appreciate you’re busy so I thought I’d touch base by email. I don’t think I’ve seen you since, so congratulations on becoming the permanent director! It’s always good to be settled in knowing what you’ll be doing for the foreseeable future.

s.40(1)

I’ve just started a new position with Marathon Gold Corp, who you are likely aware of. Part of my role is to manage the EA for the project and for that reason I’m reaching out to you. I know that Brent Keeping was the previous EA contact for Marathon with respect to the exploration-related activities over the past 7 or 8 years, and with his departure, I’m not sure if you or anyone else in your group is familiar with our project.

Marathon’s project will certainly trigger an EIS at both the provincial and federal levels. We are planning to submit a joint EA Registration/Project Description in March to get things started officially, and I was hoping we could chat about things to expect from our perspective and yours, and for us to provide a brief introduction/overview of the project so you have some information on the scope. Perhaps you and I can, and anyone else you’d like to include, can have an initial meeting to discuss at your convenience? Please feel free to reach me by email or phone.
Thanks in advance.
Cheers,
Jamie

James Powell, M.Eng., P.Eng.
Director of Environment and Stakeholder Engagement
Marathon Gold Corporation
Email: jpowell@marathon-gold.com
Phone: 709-730-5046

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Collins, Ryan

From: Sweeney, Joanne
Sent: Wednesday, January 16, 2019 3:47 PM
To: Squires, Susan
Subject: RE: Marathon Gold

3:30 is good for me.

Joanne

From: Squires, Susan <SusanSquires@gov.nl.ca>
Sent: Wednesday, January 16, 2019 3:46 PM
To: Sweeney, Joanne <joannesweeney@gov.nl.ca>
Subject: RE: Marathon Gold

3:30pm okay instead... no meeting rooms at 2pm.
Susan
---
Susan Squires, Ph.D.
Director
Environmental Assessment Division
Department of Municipal Affairs and Environment
Government of Newfoundland and Labrador
709-729-0673
susansquires@gov.nl.ca

From: Sweeney, Joanne <joannesweeney@gov.nl.ca>
Sent: Wednesday, January 16, 2019 3:24 PM
To: Squires, Susan <SusanSquires@gov.nl.ca>
Subject: RE: Marathon Gold

Sure.

Joanne

From: Squires, Susan <SusanSquires@gov.nl.ca>
Sent: Wednesday, January 16, 2019 3:21 PM
To: Sweeney, Joanne <joannesweeney@gov.nl.ca>
Subject: FW: Marathon Gold

Joanne,

Are you able to meet with me and Marathon Gold on Tuesday afternoon? I was also going to suggest that Paul participate.

Thanks,
Susan
From: James Powell <jpowell@marathon-gold.com>
Sent: Wednesday, January 16, 2019 3:17 PM
To: Squires, Susan <SusanSquires@gov.nl.ca>
Subject: RE: Marathon Gold

Thanks Susan. I agree with respect to bringing in other members of your team. Initially I’m looking to keep things simple and want to talk just about the EA component with you folks. We are planning to have a larger scale consultation a little later, inviting all regulators to a presentation of the project and question/answer session. In addition, I plan to meet with most groups individually to discuss specific items that may be of interest.

Will Tuesday afternoon, say 2 pm work on your end?

Cheers,
Jamie

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It would be great to connect and discuss the current status of the project. It might be prudent to have myself and two of the Environmental Scientists participate so we can rebuild a knowledge base about Marathon within the Division. Are there any other regulators that would be helpful to pull in at this point (e.g. Water Resources, Natural Resources, Fisheries and Land Resources)?

Did you have a date or time in mind? Monday of next week is filling up for me, but the rest of the week has some flexibility.

Kind regards,
Susan
---
Susan Squires, Ph.D.
Director
Environmental Assessment Division
Department of Municipal Affairs and Environment
Government of Newfoundland and Labrador
709-729-0673
susansquires@gov.nl.ca

From: James Powell <jpowell@marathon-gold.com>
Sent: Wednesday, January 16, 2019 2:20 PM
To: Squires, Susan <SusanSquires@gov.nl.ca>
Subject: Marathon Gold

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congratulations on becoming the permanent director! It’s always good to be settled in knowing what you’ll be doing for the foreseeable future.

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Marathon’s project will certainly trigger an EIS at both the provincial and federal levels. We are planning to submit a joint EA Registration/Project Description in March to get things started officially, and I was hoping we could chat about things to expect from our perspective and yours, and for us to provide a brief introduction/overview of the project so you have some information on the scope. Perhaps you and I can, and anyone else you’d like to include, can have an initial meeting to discuss at your convenience? Please feel free to reach me by email or phone.

Thanks in advance.
Cheers,
Jamie

James Powell, M.Eng., P.Eng.
Director of Environment and Stakeholder Engagement
Marathon Gold Corporation
Email: jpowell@marathon-gold.com
Phone: 709-730-5046

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Thank you Shabnam.

I will forward a scan of the signed and witnessed acceptance page to you later this morning.

Regards, Sherry

On Tue, Jan 22, 2019 at 9:31 AM Mostofi, Shabnam <ShabnamMostofi@gov.nl.ca> wrote:

Please see attached Water Use Licence issued to Marathon Gold Corp which includes your name on the cc list.

Regards,

Shabnam

Shabnam Mostofi, M.Sc., M.Eng., EIT
Environmental Engineer
Water Rights, Investigations, and Modelling Section
Water Resources Management Division
Department of Municipal Affairs and Environment
Government of Newfoundland and Labrador

4th Floor, West Block, Confederation Building
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Phone: (709) 729-2657 Fax: (709) 729-0320
Email: ShabnamMostofi@gov.nl.ca
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--

Sherry Dunworth, M.Sc., P.Geo.
SVP Exploration
Marathon Gold Corporation
P.O.Box 160,
Pasadena, NL, A0L 1K0
Cell: [Redacted]
Fax: 1.709.686.2317

[Redacted] s. 40(1)
WATER USE LICENCE/PERMIT
Industrial (Mineral Exploration)

Pursuant to the Water Resources Act, SNL 2002 cW-4.01

Date of Issuance: JANUARY 15, 2019

No: WU/P-19-10073
File: 514

Licensee/Holder: Marathon Gold Corp
10 King Street E., Suite 501
Toronto, ON M5C 1C3

Attention: Sherry Dunsworth

Re: Water Withdrawal and Use of Bodies of Water (Valentine Lake Property)

The Minister of Municipal Affairs and Environment (the "Minister") hereby grants a non-exclusive water right to Marathon Gold Corp (the "Licensee/Holder") to withdraw water from and use of bodies of water within the boundary of the property, as indicated in the map of exploration approval #E190001 in relation to the Licensee/Holder's Mineral Exploration project (Valentine Lake Property). This non-exclusive water right is granted in reference to the application received on December 7, 2018.

This Licence/Permit is subject to the terms and conditions, reservations, exceptions, and provisions stated herein and the Water Resources Act and regulations thereunder. Appendices A and B and the map for exploration approval (attached) form part and parcel of this Licence/Permit.

This Licence/Permit does not release the Licensee/Holder from the obligation to obtain appropriate approvals, permits or licences from other concerned municipal, provincial and federal agencies.

The Licensee/Holder shall complete and return the attached Notification of Acceptance of Water Use Licence/Permit (attached) to the Water Rights, Investigations, and Modelling Section of the Department of Municipal Affairs and Environment within thirty (30) days of receipt of this Licence/Permit.

MINISTER

ATIPP 32
GOVERNMENT OF NEWFOUNDLAND AND LABRADOR
DEPARTMENT OF MUNICIPAL AFFAIRS AND ENVIRONMENT

APPENDIX A
TERMS AND CONDITIONS FOR WATER USE LICENCE/PERMIT

The Minister of Municipal Affairs and Environment (the "Minister") hereby grants a non-exclusive water right to: Marathon Gold Corp (the "Licensor/Holden") to withdraw water from and use of bodies of water within the boundary of the property, as indicated in the map of exploration approval #E190001 in relation to the Licence/Holden's Mineral Exploration project (Valentine Lake Property). This non-exclusive water right is granted in reference to the application received on December 7, 2018.

1. Ownership of water rights remains with the Crown and is not transferred. This Water Use Licence/Permit only provides permission for the Licencee/Holden to withdraw and use water for the purpose indicated in this Licence/Permit.

2. The non-exclusive rights and privileges hereby demised by this Licence/Permit shall not be sold, assigned, transferred, leased, mortgaged, sublet or otherwise alienated by the Licencee/Holden.

3. The Licencee/Holden acknowledges and agrees that this Licence/Permit does not grant any interest in land.

4. This Licence/Permit shall expire on December 7, 2019 or earlier if suspended or modified or cancelled by the Minister due to reasons that include, but not limited to, non-compliance with the Water Resources Act, SNL 2002 c.W-4.01 and terms and conditions, reservations, exceptions, and provisions; lack of utilization of authorized water for the designated purpose or prompt reporting pursuant to this Licence/Permit. Also, this Licence/Permit may be renewed by the Minister for such renewal term as the Minister deems appropriate, on such terms and conditions as the Minister considers appropriate and in the public interest, provided the Licencee/Holden applies for a new Licence at least one hundred and eighty (180) days before the expiry of this Licence/Permit.

5. The designated purpose of the water withdrawal and use is Industrial/Mineral Exploration.

6. The estimated annual water withdrawal from the said bodies of water shall not exceed 23,725 cubic meters (or 65,000 litres daily), subject to water availability without changing the hydraulic characteristics of or causing impact on fish and fish habitat in the said bodies of water or impact on other existing water users. The Licencee/Holden shall not at any time withdraw and use amounts of water in excess of the need for the Licencee/Holden's mineral exploration activities, irrespective of the amount of water authorized.

7. In case of drilling on the ice cover of the said bodies of water, the Licencee/Holden shall ensure that the ice is sufficiently thick and structurally sound and able to safely support the drilling rig and all associated equipment on the ice surface. The ice surface must be inspected daily as long as the equipment is on the ice and a written record of these inspections must be kept in a suitable logbook. More frequent inspections are required when there are sudden temperature changes.

8. The Licencee/Holden shall not at any time impair, pollute or cause to be polluted the quality of water in the said bodies of water or any nearby body of water. Also, this Licence/Permit shall not be interpreted as granting any rights to cause adverse effect(s) on water in or outside the mineral exploration activities areas and all operations must be carried out in a manner that prevents damage to land, vegetation, and bodies of water. The Water Resources Management Division of this Department must be informed if the mineral exploration activities have a potential to impair water quality of the said bodies of water or any nearby body of water. In addition, any and all waste material that may result from the mineral exploration activities must be removed from the mineral exploration activities areas and disposed of at a site approved by the regional Government Service Centre of the Department of Service NL. This Department and Department of Service NL may require samples to be submitted for testing and analysis.

9. Water pumped or discharged from the mineral exploration activities, or any run off or effluent directed out of the mineral exploration activities areas, must have silt and turbidity removed by settling ponds, filtration, or other suitable treatment before discharging to any body of water. Effluent discharged into receiving waters must comply with the Environmental Control Water and Sewage Regulations, 2003.

10. Used drilling mud and cuttings must be collected in a closed system of settling tanks and disposed of at a site approved by the regional Government Service Centre of the Department of Service NL. This site must not be within 100 metres of any body of water. The water in the system must be recycled.

11. The Licencee/Holden shall keep records for water withdrawals and uses and other information and complete and file
a form following the format of Appendix B with the Water Rights, Investigations, and Modelling Section of this Department on or before January 31st of each year during the mineral exploration activities. Also, the Licensee/Holder may be required to monitor, report and assess water quality and quantity of the water available and supplied to the Licensee/Holder’s mineral exploration activities in such manner as the Minister considers necessary such as flowmeter(s) for the said bodies of water.

12. The Licensee/Holder shall not construct any systems or works, make changes in the purpose, rates and amounts of water specified in this Licence/Permit, or divert the course or alter the physical features of the said bodies of water or any nearby body of water without the prior written permission of the Minister.

13. The Licensee/Holder and its agent(s), subcontractor(s), and consultant(s) shall keep all systems, equipment, works and vehicles used for the mineral exploration activities in clean and good condition and repair, free of oil leaks, or other harmful substances that could impair water quality of any body of water in accordance with all laws, by-laws, directions, rules and regulations of any governmental authority. The Licensee/Holder or its agent(s), subcontractor(s), or consultant(s) shall notify the Minister immediately if any problem arises which may affect the systems, equipment and works, endanger public safety and/or the environment or adversely affect other existing users and/or any body of water either in or outside the mineral exploration activities areas. Also, the Licensee/Holder shall restore all areas that may be affected by mineral exploration activities to a state that resembles local natural conditions. Further remedial measures to mitigate environmental impacts on water resources can and will be specified, if necessary in the opinion of this Department. The Licensee/Holder and its agent(s), subcontractor(s), and consultant(s) shall be responsible for all damages suffered by the Minister and Government resulting from any defect in the systems, equipment, works, or operational deficiencies/inefficiencies.

14. In case of drilling on the ice cover of the said bodies of water, a dyke or other suitable device must be placed around the immediate perimeter of the ice hole and around the perimeter of the drilling area to prevent any fluid, fuel or other foreign substance from entering the water or spreading across the ice surface.

15. When possible, drilling should take place using water alone. If this is not possible, then only environmentally approved drilling fluids shall be used and a mud recovery system must be used. Also, All fuels and lubricants must be stored in an approved manner on land, no closer than 30 metres to any body of water. Only sufficient fuel for one refueling shall be brought on the ice at one time.

16. This Licence/Permit is subject to the Water Use Charges Regulations, NLR 60/16 under the Water Resources Act, 2002 and the Licensee/Holder shall on receipt of an invoice stating the amount owing for water use charges, pay to the Minister the full amount within thirty (30) days of the receipt of the said invoice and if imposed by provincial legislation, fees, incentives, royalties or subsidies for water use.

17. The Licensee/Holder and its agent(s), subcontractor(s), and consultant(s) are responsible for reporting any environmental problem encountered in connection with the said bodies of water or any nearby body of water to the Water Resources Management Division and environmental monitors within 24 hours. This includes, but is not limited to, any spillage of fuel, lubricant, drilling mud or any other material, siltation of water or depletion of any source of water used for any purpose in connection with the mineral exploration activities.

18. The employees of this Department, authorized by the Minister, may at all reasonable times during the term created by this Licence/Permit enter into the mineral exploration activities areas and the Licensee/Holder’s designated place of business to inspect the systems, equipment, works, records, statements, and accounts, and shall be entitled to copy such information as may be required by the Minister in relation to this Licence/Permit and may exercise all other powers of inspection as provided for in the Water Resources Act, 2002.

19. The Licensee/Holder and its agent(s), subcontractor(s), and consultant(s) indemnify and hold the Minister and Government harmless against any and all liabilities, losses, claims, demands, damages or expenses including legal expenses of any nature whatsoever whether arising in tort, contract, statute, trust or otherwise resulting directly or indirectly from granting this Licence/Permit, systems, equipment and works in or outside the mineral exploration activities areas, or any act or omission of the Licensee/Holder in or outside the mineral exploration activities areas, or arising out of a breach or non-performance of any of the terms and conditions, and provisions of this Licence/Permit by the Licensee/Holder or its agent(s), subcontractor(s), or consultant(s).

20. If the Licensee/Permit Holder or its agent(s), subcontractor(s), or consultant(s) fails to perform, fulfill, or observe any of the terms and conditions, or provisions of this Licence/Permit and/or Ministerial orders and guidelines, as determined by this Department, the Minister may, after providing ten (10) day notice to the Licensee/Permit Holder, amend, modify, suspend or cancel this Licence/Permit in accordance with the Water Resources Act, 2002.

21. Should any provision of this Licence/Permit be unenforceable, it shall be considered separate and severable from the remaining provisions of this Licence/Permit which shall remain in force and be binding as though the provision had not been included.
22. This Licence/Permit is subject to all provisions of the Water Resources Act, 2002 and any regulations in effect either at the date of this Licence/Permit or hereafter made pursuant thereto or any other relevant legislation enacted by the Province of Newfoundland and Labrador in the future.

23. This Licence/Permit shall be construed and interpreted in accordance with all applicable laws of the Province of Newfoundland and Labrador.

24. This Licence/Permit shall remain in force and effect until such time as the Mineral Lands Division Approval is valid or until such time as it is revoked by the Minister of Municipal Affairs and Environment of the Province of Newfoundland and Labrador or his successor in office for failure to comply with one or more of the provisions of this Licence/Permit (as amended from time to time) or with the provisions of the Water Resources Act, SNL 2002 c.W-4.01 and any regulations in effect thereunder from time to time and any other relevant legislation enacted by the Province of Newfoundland and Labrador in the future.

All notices to be given pursuant to the terms and conditions of this Licence/Permit shall be given in writing and delivered by facsimile with auto confirmation or registered mail. If a notice is delivered by facsimile, it is deemed to have been received on the day it was sent if that day is a normal business day, if not, it is deemed to have been received on the next normal business day. If a notice is sent by registered mail, it is deemed to have been received three days after the day it was mailed. The address of the Licensee/Holder is:

Marathon Gold Corp
10 King Street E., Suite 501
Toronto, ON M5C 1C3

The address and facsimile number of the Department of Municipal Affairs and Environment are:

Water Rights, Investigations, and Modelling Section
Department of Municipal Affairs and Environment
PO Box 8700
St. John's NL A1B 4J6
(709) 729-0328
GOVERNMENT OF
NEWFOUNDLAND AND LABRADOR
DEPARTMENT OF MUNICIPAL AFFAIRS AND ENVIRONMENT
APPENDIX B
Report to Department of Municipal Affairs and Environment

To: Water Rights, Investigations, and Modelling Section
Water Resources Management Division
Department of Municipal Affairs and Environment
PO Box 8700
St. John's NL A1B 4J6

No: WUL/9-19-10073
File: 514
Authorized: JANUARY 15, 2019

Re: Water Withdrawal and Use of Bodies of Water (Valentine Lake Property)

This report must be completed and filed on or before January 31st of each year or upon the completion of activities for a temporary period. Provide the information required below.

1. Has the Licensee/Holder used water during last year? If no, explain (use extra sheet to provide more information, if any).
   Yes □ No □

2. Does the Licensee/Holder wish to continue the non-exclusive water right? If no, explain (use extra sheet to provide more information, if any).
   Yes □ No □

3. Has the Licensee/Holder exceeded the estimated maximum daily water withdrawal of that indicated in Appendix A? If yes, explain in the space below (use extra sheet to provide more information, if any).
   Yes □ No □

In the table below, state the monthly water uses during last year or a temporary period and attach spreadsheet for daily water uses along with water quality report(s) as may be applicable:

<table>
<thead>
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<tr>
<td>Use in litres or cubic meters</td>
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</tbody>
</table>

4. Is there any other matter on which the Licensee/Holder wishes to inform the Department of Municipal Affairs and Environment regarding this Licence/Permit and its terms and conditions? If yes, explain (use extra sheet to provide more information, if any).
   Yes □ No □

We acknowledge that the information contained in this report is true and correct.

Marathon Gold Corp
10 King Street E., Suite 501
Toronto, ON M5C 1C3

Signature: ____________________________
Name/Title: ____________________________
Date: ____________________________
Manager, Water Rights, Investigations and Modelling Section
Water Resources Management Division
Department of Municipal Affairs and Environment
P.O. Box 8700
4th Floor, West Block, Confederation Building
St. John's, NL A1B 4J6
akhan@gov.nl.ca

cc: File Copy for Binder

cc: Jeremy Keeping (Western)
Land Management Specialist
Crown Lands Administration
jeremykeeping@gov.nl.ca

cc: Fisheries Protection Division
Ecosystem Management Branch
Fisheries and Oceans Canada
P.O. Box 5667
St. John's, NL A1C 5X1
FPP-NL@dfo-mpo.gc.ca

cc: Ms. Martha Drake
Provincial Archaeologist, Historic Resources Division
Dept. of Business, Tourism, Culture and Rural Development
P.O. Box 8700
St. John's, NL A1B 4J6
mdrake@gov.nl.ca

cc: Justin Lake
Geologist II
Mines - Mineral Development
JustinW.Lake@gov.nl.ca

cc: Ms. Heather Refuse
Exploration Approvals Geologist, Exploration Approvals and Inspections Section
Mineral Lands Division, Department of Natural Resources
50 Elizabeth Avenue, P.O. Box 8700
St. John's, NL A1B 4J6
exploration_approval@gov.nl.ca
NOTIFICATION OF ACCEPTANCE OF WATER USE LICENCE/PERMIT

Water Withdrawal and Use of Bodies of Water (Valentine Lake Property)

Water Use Licence/Permit No. **WUL/P-19-10073** issued on **JANUARY 15, 2019** and valid until **December 07, 2019**.

As a Licensee/Holder of Water Use Licence/Permit No **WUL/P-19-10073**, issued pursuant to the **Water Resources Act**, *Marathon Gold Corp* (the "Licensee/Holder"), agrees to accept this Licence/Permit for the stated duration and abide by all terms and conditions, reservations, exceptions and provisions stated therein. The Licensee/Holder acknowledges that failure to abide by the terms and conditions, reservations, exceptions and provisions indicated in Appendices A and B and the map for Exploration Approval (attached) of the Licence/Permit and the **Water Resources Act** will render the Licence/Permit null and void, place the Licensee/Holder and/or their agent(s) in violation of the **Water Resources Act** and regulations thereunder and cause the Licensee/Holder to be responsible for any and all remedial measures which may be prescribed by the Department of Municipal Affairs and Environment.

Signed, sealed, and delivered by
*Marathon Gold Corp*,
in accordance with its rules and regulations in that behalf
at ___________ ___________, this __________ day
of ________, 2019 in the presence
of:

Witness

Per: 

Signing Officer

Seal:

**Important:** The attached Water Use Licence/Permit is not valid unless the Licensee/Holder completes and returns this notification to the address above within thirty (30) days of receipt.
Thank you very much Shabnam.

I appreciate obtaining the link and information.

Yes, I thought it was a bit odd when NR (Matt Snow) had the Dec 7, 2019 expiry for the exploration permit. I will discuss with him now.

Regards, Sherry

On Tue, Jan 22, 2019 at 2:09 PM Mostofi, Shabnam <ShabnamMostofi@gov.nl.ca> wrote:

Hi Sherry,

Thank you for sending the signed notification of acceptance and providing the mailing address.

Water Use Licence for Mineral Exploration activities are issued based on approval sent to us by Mineral Lands Division. The Mineral Exploration Approval for Valentine Lake Property has expiry date of December 7, 2019. Consequently, your WUL will have the same expiry date.

I have attached the approval for your information.

In respect to your second question, water use charges are determined based on type of WUL. You can find more detail in this link:

https://www.assembly.nl.ca/Legislation/sr/regulations/rc160060.htm

As you can see from the above link, water use charge is not based on volume for Mineral Exploration category. It is $1000 per Licence.

Regards,

Shabnam
Hi Shabnam,

Please find attached the signed WUL./P-19-10073 form for Marathon Gold Corporation.

The mailing address for future invoicing should be the regional office here in NL. Please use::

Sherry Dunsworth
Marathon Gold Corporation
P.O. Box 160
Pasadena, NL
A0L 1K0

I have 2 questions:

(1) why does the 2019 WUL expire on Dec 7, 2019 rather than Dec 31, 2019?

(2) how is the water usage tax determined - is it amount per liter used? or other criteria? If this is explained in a recent document can you please direct me to the document or send along a copy.

Thank you,
Sherry

Sherry Dunsworth, M.Sc., P.Geo.
SVP Exploration
Marathon Gold Corporation
P.O. Box 160,
Pasadena, NL, A0L 1K0

Cell: [redacted]
Fax: 1.709.686.2317

s.40(1)

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NOTIFICATION OF ACCEPTANCE OF WATER USE LICENCE/PERMIT
Water Withdrawal and Use of Bodies of Water (Valentine Lake Property)

Water Use Licence Permit No. **WUL/P-19-10073** issued on **JANUARY 15, 2019** and valid until **December 07, 2019**.

As a Licensee Holder of Water Use Licence Permit No **WUL/P-19-10073**, issued pursuant to the **Water Resources Act**, **Marathon Gold Corp** (the "Licensee/Holder"), agrees to accept this Licence Permit for the stated duration and abide by all terms and conditions, reservations, exceptions and provisions stated therein. The Licensee Holder acknowledges that failure to abide by the terms and conditions, reservations, exceptions and provisions indicated in Appendices A and B and the map for Exploration Approval (attached) of the Licence Permit and the **Water Resources Act** will render the Licence Permit null and void, place the Licensee Holder and or their agent(s) in violation of the **Water Resources Act** and regulations thereunder and cause the Licensee Holder to be responsible for any and all remedial measures which may be prescribed by the Department of Municipal Affairs and Environment.

Signed, sealed, and delivered by **Marathon Gold Corp**, in accordance with its rules and regulations in that behalf at **Resolute, NL**, this **22** day of **Jan., 2019** in the presence of:

**W. H. P. Co.**

**Per:**
**Signing Off:**

---

**Important:** The attached Water Use Licence/Permit is not valid unless the Licensee/Holder completes and returns this notification to the address above within thirty (30) days of receipt.
Hi Susan,

It’s been a few months since I’ve been to Confederation Building – is the protocol still the same, ie. to use the rear East Block Entrance and someone will need to come and meet me?

Thanks,
Jamie

James Powell, M.Eng., P.Eng.
Director of Environment and Stakeholder Engagement
Marathon Gold Corporation
Email: jpowell@marathon-gold.com
Phone: 709-730-5046
Thanks Matt,

This is just in case we drill into Dec further than Dec 7th. We will always have a skeletal crew (2-person) on site through Dec otherwise the exploration camp would perhaps be looted based on past experience.

Thank you, Sherry

On Wed, Jan 23, 2019 at 9:44 AM Snow, Matthew <MatthewSnow@gov.nl.ca> wrote:

I misunderstood your previous email. I thought you meant the WUL expired on 31st of December so aligning the approval to match would be straight forward.

Shabnam - See Sherry’s request below re: adjustment of the expiry of WUL. Is this possible? Current expiry for December 7, adjust to December 31.

Cheers

Matthew Snow

Mineral Exploration Site Inspector

Mineral Lands Division

NL Department of Natural Resources

telephone (709) 729-5634, cell (709) 649-0970

matthewsnow@gov.nl.ca

P.O. Box 8700, 50 Elizabeth Avenue, St. John's A1B 4J7

From: Sherry Dunsworth
Sent: Wednesday, January 23, 2019 9:29 AM
To: Snow, Matthew
Subject: Re: Approval E190001 for Marathon Gold Corp.
Thank you Matt.

Sorry for the confusion.

Do you think I should advise Water Usage Licence as she has the Dec 7th closing date as well.

Sherry

On Wed, Jan 23, 2019 at 9:21 AM Snow, Matthew <MatthewSnow@gov.nl.ca> wrote:

Sherry

Thanks for the update. No problem with the 2019 approval, I’ll re-issue it to you for the 31st

Cheers

Matthew Snow
Mineral Exploration Site Inspector
Mineral Lands Division
NL Department of Natural Resources
telephone (709) 729-5634, cell (709) 649-0970
matthewsnow@gov.nl.ca
P.O. Box 8700, 50 Elizabeth Avenue, St. John's A1B 4J7

s.40(1)

From: Sherry Dunsworth
Sent: Tuesday, January 22, 2019 2:19 PM

2
To: Snow, Matthew
Subject: Re: Approval E190001 for Marathon Gold Corp.

Hello Matt,

I just noticed the 2019 exploration approval expires Dec 7, 2019 rather than Dec 31, 2019. I looked any my application and realized I had entered Nov 30, 2019 rather than Dec 31, 2019. As this is the possibility we could be drilling the first 1-2 weeks of Dec 2019, is there any opportunity to chance that date from Dec 7, 2019 to Dec 31, 2019. The other reason I ask is that, of course, the WUL for 2019 also expires Dec 7, 2019 rather than Dec 31, 2019.

Sorry for causing this small issue. Please let me know if I need to be concerned with the Dec 7 rather than Dec 31 expiry.

I also wanted to advise you that we have begun drilling with 1 drill at the Valentine property.

Thank you, Sherry

On Fri, Dec 7, 2018 at 4:13 PM Snow, Matthew <MatthewSnow@gov.nl.ca> wrote:

Sherry

Please see attached approval for the 2019 exploration program at Valentine Lake.

Cheers

Matthew Snow
Mineral Exploration Site Inspector
Mineral Lands Division
NL Department of Natural Resources
Hi Jamie,

Thanks for your email. The Department’s policy directive for environmental assessment fees is attached. The authority to collect the fees is given by section 74 Of the Environmental Protection Act. The incremental fees outlined in the “Fees for Environmental Assessment” document I sent you this morning are fairly self-explanatory. Specific costs, if applicable, will depend on things like the number of environmental assessment committee members participating in a site visit, or the need to establish a Board or hire an environmental monitor. Some projects don’t incur any incremental expenses. It’s difficult to anticipate these costs prior to the environmental assessment. Have a look at the attached Policy Directive and fell free to call me if you’d like to discuss.

Regards,

Joanne

Joanne Sweeney
Tel. (709) 729-0673

Hi Joanne,

Thank you for your (and Paul’s) time yesterday and the follow-up email and info. The timelines are as I already understood. In terms of the costs, I’ve seen these already, however I’m wondering if there’s more that you can tell us or explain to us about the potential ‘incremental fees’. Based on the description, these fees could be substantial, and obviously we would like to understand what these could be so that the appropriate funds can be budgeted, if required. There is a note at the bottom indicating these would relate to a more detailed policy, however the link is disabled.

Thanks,
Jamie

James Powell, M.Eng., P.Eng.
Director of Environment and Stakeholder Engagement
Marathon Gold Corporation
Email: jpowell@marathon-gold.com
Phone: 709-730-5046
Hi Jamie,

Thanks for meeting with us yesterday and providing an overview of Marathon’s project plans for the area southwest of Buchans/Millertown. I look forward to receiving your registration submission. As promised, I’ve attached information regarding the environmental assessment (EA) timelines as per the Environmental Assessment Regulations. The Registration and EIS timelines will be of interest to you. I’ve also attached our fee structure in accordance with the current Cost Recovery Policy of the Department, for your information.

If you have any questions about the EA process, please feel free to call me at 729-0673 or send me an email.

Regards,

Joanne

Joanne Sweeney
Director (A)
Environmental Assessment Division
Department of Municipal Affairs and Environment
PO Box 8700, St. John's  NL  A1B 4J6
Tel. (709) 729-0673

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<table>
<thead>
<tr>
<th>Registration Stage</th>
<th>Days Allowed</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Registration submission by proponent</td>
<td>-</td>
</tr>
<tr>
<td>2. Announcement of receipt of registration <em>(from submission)</em></td>
<td>7</td>
</tr>
<tr>
<td>3. Public &amp; government review of registration <em>(from announcement)</em></td>
<td>35</td>
</tr>
<tr>
<td>4. Registration decision - release or EPR or EIS <em>(from submission)</em></td>
<td>45</td>
</tr>
<tr>
<td>5. Announcement of decision <em>(from decision)</em></td>
<td>10</td>
</tr>
<tr>
<td>6. Cabinet decision - contrary to law or policy <em>(from submission)</em></td>
<td>60</td>
</tr>
<tr>
<td>7. Registration decision if Cabinet not disallow EA <em>(from submission)</em></td>
<td>105</td>
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</table>

### Environmental Preview Report (EPR) Stage

<table>
<thead>
<tr>
<th>Environmental Preview Report (EPR) Stage</th>
<th>Days Allowed</th>
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</thead>
<tbody>
<tr>
<td>1. Announcement of decision to require EPR <em>(from Registration decision)</em></td>
<td>10</td>
</tr>
<tr>
<td>2. Issuance of EPR Guidelines (GL) <em>(from decision to require EPR)</em></td>
<td>60</td>
</tr>
<tr>
<td>3. EPR preparation &amp; submission by proponent <em>(from Registration decision)</em></td>
<td>3-6 years</td>
</tr>
<tr>
<td>4. Announcement of receipt of EPR &amp; addendum <em>(from submission)</em></td>
<td>7</td>
</tr>
<tr>
<td>5. Public &amp; govt review of EPR <em>(from announcement: repeat if addendum)</em></td>
<td>35</td>
</tr>
<tr>
<td>6. Decision - EPR acceptance; release or EIS <em>(from final EPR submission)</em></td>
<td>45</td>
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<tr>
<td>7. Announcement of decision <em>(from decision)</em></td>
<td>10</td>
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</table>

### Environmental Impact Statement (EIS) Stage

<table>
<thead>
<tr>
<th>Environmental Impact Statement (EIS) Stage</th>
<th>Days Allowed</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Announcement of decision to require EIS <em>(from decision)</em></td>
<td>10</td>
</tr>
<tr>
<td>2. Public review of draft EIS Guidelines</td>
<td>40</td>
</tr>
<tr>
<td>3. Issuance of EIS Guidelines to proponent <em>(from decision to require EIS)</em></td>
<td>120</td>
</tr>
<tr>
<td>4. Announcement &amp; public release of EIS Guidelines <em>(from issuance of GL)</em></td>
<td>10</td>
</tr>
<tr>
<td>Component Studies (CS)</td>
<td></td>
</tr>
<tr>
<td>5. CS preparation &amp; submission by proponent <em>(from issuance of GL)</em></td>
<td>3-6 years</td>
</tr>
<tr>
<td>6. Announcement of receipt of CS <em>(from submission)</em></td>
<td>7</td>
</tr>
<tr>
<td>7. Public &amp; govt review of CS <em>(from announcement: repeat if addendum)</em></td>
<td>35</td>
</tr>
<tr>
<td>8. Decision - CS acceptance <em>(from submission of final CS)</em></td>
<td>50</td>
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<tr>
<td>9. Announcement of decision <em>(from decision)</em></td>
<td>10</td>
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<tr>
<td>EIS</td>
<td></td>
</tr>
<tr>
<td>10. EIS preparation &amp; submission by proponent <em>(from approval of GL)</em></td>
<td>3-6 years</td>
</tr>
<tr>
<td>11. Announcement of receipt of EIS <em>(from submission)</em></td>
<td>7</td>
</tr>
<tr>
<td>12. Public &amp; govt review of EIS <em>(from announcement: repeat if addendum)</em></td>
<td>50</td>
</tr>
<tr>
<td>13. Decision - EIS acceptance <em>(from submission of final EIS)</em></td>
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<tr>
<td>14. Announcement of decision <em>(from EIS acceptance decision)</em></td>
<td>10</td>
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<tr>
<td>15. Recommendation to Cabinet <em>(from EIS acceptance decision)</em></td>
<td>30</td>
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<tr>
<td>EA BOARD</td>
<td></td>
</tr>
<tr>
<td>16. Recommendation for Board appointment <em>(from EIS acceptance decision)</em></td>
<td>30</td>
</tr>
<tr>
<td>17. Appointment of Board <em>(from recommendation)</em></td>
<td>30</td>
</tr>
<tr>
<td>18. Announcement of appointment <em>(from appointment)</em></td>
<td>7</td>
</tr>
<tr>
<td>19. Public hearings commence <em>(from announcement of appointment)</em></td>
<td>30-90</td>
</tr>
<tr>
<td>20. Answers to public hearing questions <em>(from closing date of hearings)</em></td>
<td>30</td>
</tr>
<tr>
<td>21. Public hearing report <em>(from closing date of hearings)</em></td>
<td>45</td>
</tr>
<tr>
<td>22. Recommendation to Cabinet <em>(from submission of report)</em></td>
<td>60</td>
</tr>
</tbody>
</table>
Fees for Environmental Assessment

Under the *Environmental Protection Act SNL2002 cE-14.2* the Minister of Municipal Affairs and Environment has the authority to set fees for the environmental assessment process.

**These fees are effective May 1, 2016.**

Fees apply to private and public sector proponents. Non-profit organizations are exempt.

All proponents are subject to a registration fee of **$400 (plus HST)** due upon submission of the registration document. HST applies for private sector proponents.

**Undertakings Greater Than $5 Million**

Undertakings with an estimated capital cost greater than $5 million as determined by the Director of Environmental Assessment* are subject to the following:

**Fixed Fees**

<table>
<thead>
<tr>
<th></th>
<th>Fee</th>
<th>Due</th>
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</thead>
<tbody>
<tr>
<td>Environmental Preview Report (EPR)</td>
<td>$10,000 +HST</td>
<td>Two installments: $5,000 prior to the issuance of EPR guidelines by the Minister and $5,000 on submission of the EPR</td>
</tr>
<tr>
<td>Environmental Impact Statement (EIS)</td>
<td>$30,000 +HST</td>
<td>Two installments: $15,000 prior to the issuance of EIS guidelines by the Minister and $15,000 on submission of the EIS</td>
</tr>
<tr>
<td>Substantial revision to EIS</td>
<td>$6,000 +HST</td>
<td>On submission</td>
</tr>
<tr>
<td>Component Study</td>
<td>$6,000 +HST</td>
<td>On submission</td>
</tr>
<tr>
<td>Environmental Protection Plan</td>
<td>$6,000 +HST</td>
<td>On submission</td>
</tr>
<tr>
<td>Environmental Effects Monitoring Program</td>
<td>$6,000 +HST</td>
<td>On submission</td>
</tr>
</tbody>
</table>

**Incremental Fees**

Incremental fees will be set according to a budget prepared by the Director* in consultation with the proponent, and will include:
• Above normal costs for an environmental assessment including:
  o site visits and other travel by members of an Environmental Assessment Committee,
  o consultant advice where required expertise is not available within Government,
  o hiring of staff dedicated to the environmental assessment of a specific project, and
  o environmental surveillance over and above monthly inspection;
• Costs of an Environmental Assessment Board established under the *Newfoundland and Labrador Environmental Protection Act* SNL2002 Chapter E-14.2;
• Province’s share of costs associated with a joint federal-provincial panel review.

**Payment**

Make cheque or money order payable to the Newfoundland Exchequer.

Fees or proof of payment (e.g. cashier’s receipt from Department of Finance) shall be submitted to the Environmental Assessment Division.

**Non-Payment**

In case of non-payment of fees, the environmental assessment of an undertaking will not proceed nor will environmental assessment documents be considered to be accepted.

*See full policy for further information (PDF link to full policy).*
DEPARTMENT OF ENVIRONMENT AND CONSERVATION

POLICY DIRECTIVE - FEES FOR ENVIRONMENTAL ASSESSMENT

OBJECTIVE

To establish a procedure and set of fees to be charged to proponents of major undertakings/projects to offset Government’s cost of service for the conduct of environmental assessments.

BACKGROUND

The 2016/17 Budget stipulates that the Department of Environment and Conservation must revise its recovery costs incurred for the administration of the environmental assessment process for major projects. This policy statement gives effect to the Budget decision.

LEGISLATION

The Environmental Protection Act SNL2002 cE-14.2 enables the Minister of Environment and Conservation to set fees to offset the costs incurred by the Crown for the environmental assessment of undertakings.

POLICY

This policy institutes the procedure and set of fees given below. The effective date for all fees is May 1, 2016. Fees apply to private and public sector proponents. Non-profit organizations are exempt.

1. All proponents are subject to a registration fee of $400 (plus HST) due upon submission of the registration document.

2. The remainder of this policy applies to undertakings with an estimated capital cost greater than $5 million as determined by the Director of Environmental Assessment. This determination will be based on an estimate of the capital cost of the undertaking provided by the proponent prior to the start of an environmental assessment. The proponent will use current standard estimating practices and construction costs. If, after consultation with the proponent, the Director is not satisfied that the proponent’s estimate is reasonable, the Director may obtain an estimate from an independent estimator. The cost of such estimate will be charged to the proponent if the final assessment supports the position of the Director. In case of dispute on whether this policy applies the Minister is the final authority.

3. Fixed fees shall be charged as follows:
   - Environmental Previews Report (EPR) - $10,000 in two installments: $5,000 prior to the issuance of EPR guidelines by the Minister and $5,000 on submission of the EPR;
   - Environmental Impact Statement (EIS) - $30,000 in two installments: $15,000 prior to the issuance of EIS guidelines by the Minster and $15,000 on submission of the EIS;
   - Substantial revision to EIS - $6,000 on submission;
   - Component Study - $6,000 on submission;
   - Environmental Protection Plan - $6,000 on submission;
   - Environmental Effects Monitoring Program - $6,000 on submission.
Notes: **HST applies for private sector proponents** and must be added to the amounts shown. Incremental fees shall be charged as follows:

- above normal costs for an environmental assessment including:
  - site visits and other travel by members of an Environmental Assessment Committee,
  - consultant advice where required expertise is not available within Government,
  - hiring of staff dedicated to the environmental assessment of a specific project, and
  - environmental surveillance over and above monthly inspection;
- costs of an Environmental Assessment Board established under the Newfoundland the NL *Environmental Protection Act* SNL2002 Chapter E-14.2;
- Province’s share of costs associated with a joint federal-provincial panel review.

Notes: Fees for a given undertaking will be in line with a budget to be prepared by the Director in consultation with the proponent and normally issued to the proponent in advance of applicable expenditures being made. Applicable fees predating this policy directive may be included in the budget. In case of dispute, the Minister is the final authority.

4. Payment of fees shall be by cheque or money order made payable to the Newfoundland Exchequer. Fees or proof of payment (e.g. cashier’s receipt from Department of Finance) shall be submitted to the Environmental Assessment Division.

5. In case of non-payment of fees, the environmental assessment of an undertaking will not proceed nor will environmental assessment documents be considered to be accepted.