Re: Your request for access to information under Part II of the Access to Information and Protection of Privacy Act (File # NR-18-2020)

On January 15, 2020, the Department of Natural Resources received your request for access to the following records/information:

Hello, I am requesting any information on interactions between the Natural Resources department and the mining exploration company - Marathon Gold Corp, - covering the period of September 01 - 2019 up to today's date.

I am pleased to inform you that a decision has been made by the Department of Natural Resources, confirmed by the Deputy Minister, to provide access to the requested records. The responsive records are attached.

We are providing access to the most information possible but have made redactions in accordance with Sections 35(1)(d) and 40(1) of ATIPPA, 2015 as follows:

35. (1)(d) The head of a public body may refuse to disclose to an applicant information which could reasonably be expected to disclose information, the disclosure of which could reasonably be expected to result in the premature disclosure of a proposal or project or in significant loss or gain to a third party;

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 set out in section 42 of the Act you may ask the Information and Privacy Commissioner to review the department’s decision to provide access to the requested information. 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 request should identify your concerns with the department’s
response and why you are requesting a review.

The request for review may be addressed to the Information and Privacy Commissioner is as follows:

Office of the Information and Privacy Commissioner  
2 Canada Drive  
P.O. Box 13004, Stn. A  
St. John’s, NL. A1B 3V8

Telephone: (709) 729-6309  
Toll-Free: 1-877-729-6309  
Facsimile: (709) 729-6500

Pursuant to section 52 of the Act, you may also appeal directly to the Supreme Court Trial Division within 15 business days after receiving the department’s decision.

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.

For further details about how an access to information request is processed, please refer to the Access to Information Policy and Procedures Manual at http://www.atipp.gov.nl.ca/info/index.html.

If you have any questions, please feel free to contact me at 709-729-0463 or rhynes@gov.nl.ca.

Sincerely,

Rod Hynes

ATIPP Coordinator
Hi Sherry,

Your numbers are correct. The quickest way to pay this to do it online at https://www.gov.nl.ca/pay-online/. Look for mineral license renewal, put in the information requested for both licenses and I will complete the renewal once I am back in the office next week.

Justin

From: Sherry Dunsworth <s.dunsworth.moz@gmail.com>
Sent: Monday, September 30, 2019 6:05 PM
To: Lake, Justin W <JustinWLake@gov.nl.ca>
Subject: 5 year renewal for 022477M and 10 year renewal for 016740M

Hi Justin,

I am writing you to confirm the payment requirement for 2 Marathon Gold Corporation mineral licences which are coming due for renewal in November, 2019:
5 year renewal for 022477M - 14 claims x $25/claim = $ 350.00
10 year renewal for 016740M - 4 claims x $50/claim = $ 200.00

Can you please confirm these values and then advise best way to submit early payment?

Thank you, Sherry

Sherry Dunsworth  MSc. PGeo.
SVP Exploration
Marathon Gold Corporation
s.dunsworth.moz@gmail.com
775:0575

2019/10/07

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

Dear Sir/Madam:

We are enclosing herewith Extended Map Staked Licence(s):

016740M

Please note that the date of issuance of the licence(s) is 2009/11/26. The annual report of the assessment work performed is therefore due not later than sixty days after the anniversary of the date of issuance.

Yours truly,

[Signature]

Manager - Mineral Rights
(Mineral Claims Recorder)

email:

enclosures
Extended Map Staked Licence

NO. 016740M

Under the authority of section 28 of The Mineral Act, RSNL 1990

Marathon Gold Corporation

of

Pasadena

having complied with the provisions of the Act and the Regulations, is hereby granted an Extended Map Staked Licence with respect to 4 claims as described below, and more particularly shown outlined in red on the attached plan.

DESCRIPTION

Beginning at the Northeast corner of the herein described parcel of land, and said corner having UTM coordinates of 5 364 000 N, 508 500 E; of Zone 21; thence South 1,000 metres, thence West 1,000 metres, thence North 1,000 metres, thence East 1,000 metres to the point of beginning. All bearings are referred to the UTM grid, Zone 21, NAD27.

This licence is subject to the provisions of The Mineral Act and the Regulations and to the terms and conditions set out in Schedule A of the Act.

2009/11/26
Issuance Date

2019/11/26
Extension Date

Map Sheet No(s): 12A/07

Minister of Natural Resources
NOTICE

TO ALL APPLICANTS AND HOLDERS OF GOVERNMENT LEASES, LICENCES AND PERMITS

TAKE NOTICE, the Government of Newfoundland and Labrador is negotiating a comprehensive land claims agreement with the Innu of Labrador. The conclusion of this Agreement may impact the rights, obligations or privileges you may hold as a result of the Government of Newfoundland and Labrador issuing you a lease, licence or permit.

TAKE NOTICE, as of 1 December 2005 the Labrador Inuit Land Claims Agreement with the Inuit of Labrador is in effect. This Agreement may impact the rights, obligations or privileges you may hold as a result of the Government of Newfoundland and Labrador issuing you a lease, licence or permit.

Before approving or rejecting an application for a lease, licence or permit, the Government of Newfoundland and Labrador may, at its discretion, consult with one or more Aboriginal groups.

All rights, obligations and privileges granted with leases, licences and permits are subject to change and amendment at the discretion of the Minister of Natural Resources, without notice, as a result of and arising from Aboriginal land claim negotiations, an Aboriginal land claim agreement, or an Aboriginal consultation process.

Please contact the Department of Natural Resources if you require further information or clarification.

2019-02-01

Ted Lomond
Deputy Minister
Department of Natural Resources

Natural Resources Building, 50 Elizabeth Avenue, P.O. Box 8700, St. John's, Newfoundland, Canada, A1B 4J6
Marathon Gold Corporation  
P.O. Box 160  
Pasadena, NL  
Canada, A0L 1K0

Dear Sir/Madam:

We are enclosing herewith Extended Map Staked Licence(s):

022477M

Please note that the date of issuance of the licence(s) is 2014/11/06. The annual report of the assessment work performed is therefore due not later than sixty days after the anniversary of the date of issuance.

Yours truly,

[Signature]
Manager - Mineral Rights  
(Mineral Claims Recorder)

email:

enclosures
Extended Map Staked Licence

NO. 022477M

Under the authority of section 28 of The Mineral Act, RSNL 1990

Marathon Gold Corporation

of

Pasadena

having complied with the provisions of the Act and the Regulations, is hereby granted an Extended Map Staked Licence with respect to 14 claims as described below, and more particularly shown outlined in red on the attached plan.

DESCRIPTION

Beginning at the Northeast corner of the herein described parcel of land, and said corner having UTM coordinates of 5 362 500 N, 486 000 E; of Zone 21; thence South 1,500 metres, thence West 500 metres, thence South 1,000 metres, thence West 1,500 metres, thence North 1,500 metres, thence East 1,000 metres, thence North 1,000 metres, thence East 1,000 metres to the point of beginning. All bearings are referred to the UTM grid, Zone 21. NAD27.

This licence is subject to the provisions of The Mineral Act and the Regulations and to the terms and conditions set out in Schedule A to the Act.

2014/11/06
Issuance Date

2019/11/06
Extension Date

Map Sheet No(s): 12A/06
Hi Sherry,

Receipts for the renewal payments are attached.

Justin

From: Sherry Dunsworth <s.dunsworth.moz@gmail.com>
Sent: Friday, October 4, 2019 1:04 PM
To: Lake, Justin W <JustinWLake@gov.nl.ca>
Subject: Re: 5 year renewal for 022477M and 10 year renewal for 016740M

Hi Justin,

I was online and completed payment for both of the mineral licence renewals.

My issue is that both times I tried to print receipt the system kicked me out of the site and I cannot get a copy of the receipt of payment for both licences.

Can you please assist with get a copy of receipt for both payments and send along to me.

Much appreciated, Sherry

5 year renewal for 022477M - 14 claims x $25/claim = $ 350.00
10 year renewal for 016740M - 4 claims x $50/claim = $ 200.00

Sherry Dunsworth  MSc. PGeo.
SVP Exploration
Marathon Gold Corporation
s.dunsworth.moz@gmail.com

On Mon, Sep 30, 2019 at 9:23 PM Lake, Justin W <JustinWLake@gov.nl.ca> wrote:

Hi Sherry,

Your numbers are correct. The quickest way to pay this to do it online at https://www.gov.nl.ca/pay-online/. Look for mineral license renewal, put in the information requested for both licenses and I will complete the renewal once I am back in the office next week.
Hi Justin,

I am writing you to confirm the payment requirement for 2 Marathon Gold Corporation mineral licences which are coming due for renewal in November, 2019:
5 year renewal for 022477M - 14 claims x $25/claim = $ 350.00
10 year renewal for 016740M - 4 claims x $50/claim = $ 200.00

Can you please confirm these values and then advise best way to submit early payment?

Thank you, Sherry

Sherry Dunsworth  MSc. PGeo.
SVP Exploration
Marathon Gold Corporation
s.dunsworth.moz@gmail.com
<table>
<thead>
<tr>
<th>Payment Type</th>
<th>Receipt Number</th>
<th>Payment Amount</th>
<th>Card Type</th>
<th>Date Approved</th>
<th>Contact Name 1</th>
<th>Contact Name 2</th>
<th>Contact Phone</th>
<th>Contact Email</th>
<th>Program Field Name</th>
<th>Program Field Value</th>
</tr>
</thead>
<tbody>
<tr>
<td>NAT-Mineral Licence Renewal (Web Receipt)</td>
<td>75008KQ4</td>
<td>$200.00</td>
<td>VI</td>
<td>2019-10-04 12:59:55</td>
<td>Sherry</td>
<td>Dunsworth</td>
<td><a href="mailto:S.dunsworth.moz@gmail.com">S.dunsworth.moz@gmail.com</a></td>
<td></td>
<td>Licence Number</td>
<td>016740M</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Licence Holder</td>
<td>Marathon Gold Corporation</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Year Of Mineral Licence</td>
<td>10</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Number Of Claims In Licence</td>
<td>4</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Renewal Fee Per Claim</td>
<td>$50.00</td>
</tr>
<tr>
<td>NAT-Mineral Licence Renewal (Web Receipt)</td>
<td>75008KQ1</td>
<td>$350.00</td>
<td>VI</td>
<td>2019-10-04 12:55:51</td>
<td>Sherry</td>
<td>Dunsworth</td>
<td><a href="mailto:S.dunsworth.moz@gmail.com">S.dunsworth.moz@gmail.com</a></td>
<td></td>
<td>Licence Number</td>
<td>022477M</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Licence Holder</td>
<td>Marathon Gold Corporation</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Year Of Mineral Licence</td>
<td>5</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Number Of Claims In Licence</td>
<td>14</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Renewal Fee Per Claim</td>
<td>$25.00</td>
</tr>
<tr>
<td>Totals</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>2</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>$550.00</td>
</tr>
</tbody>
</table>
Dear Minister Coady,

I have attached a letter I received today from Mr. Colin Carroll, Director Regional Services Forestry and Wildlife in which Marathon Gold Corporation has been told to remove all of our No Hunting signs except in the locations within 1000 meters of where our contractor, Rob's Excavating and General Contracting, is harvesting timber under the Marathon commercial cutting permits for District 12 and 13.

Marathon has been advised that for our workers and our contractors working on site throughout the property, conducting exploration, environmental and engineering related studies, Marathon can only erect "Caution - Men Working" signs and **HOPE** that hunters will decide to not hunt where our people are working in thick woods etc. Mr. Carroll advised that most sensible hunters would, upon seeing "Caution - Men Working" signs, decide to not hunt in an area where people were working. However, just today there was a group of hunters right at the camp gate, stating that Marathon had no right to restrict them from hunting in "their area" and one of those men was...

So I am again asking the government, how can Marathon Gold Corporation provide a physically and emotionally safe work environment when government will not allow Marathon to erect legal No Hunting signs where our men and women are working? Who is responsible if, god forbid, there is a hunting accident in which one of our workers is shot? Something must be done to allow Marathon workers and our contractors to work without the fear of being shot.

I would like to speak with you as soon as possible regarding this extremely important and ongoing issue.

Sincerely, Sherry

Sherry Dunsworth  MSc. PGeo.

SVP Exploration

Marathon Gold Corporation

s.dunsworth.moz@gmail.com
Sherry Dunworth  
Marathon Gold Corporation  
36 Birchview Drive  
P.O. Box 160

RE: No Hunting Signs

It has come to our attention that there is some confusion on the placement of “No Hunting” signs erected by Marathon Gold Corporation as it relates to commercial cutting permits in Forest Management Districts 12 and 13. As you may know, section 111 of the Wild Life Regulations prohibits a person from hunting or discharging a firearm in certain circumstances including within 1000 meters of a commercial wood cutting operation that has been clearly marked by signs stating “No Hunting”. I understand that district staff provided a map with the cutting permit, which included a 1 km buffer on the mineral exploration area. This was understood, at the time, to be acceptable placement for these signs. After consulting the Wildlife Division and our legal counsel, this has been determined to be incorrect. “No Hunting” signs should be placed 1000m from harvesting activities that fall within the larger more vast exploration area. The exploration area is not closed to other recreational activities.

While the Department is certainly aware and supportive of the need to address broader public safety concerns and mitigate against any potential risk for the safety of workers engaged in the area, we must also ensure that lawful recreational activities related to hunting are not unnecessarily fettered by the installation of inaccurate signage. In considering public safety around hunting, it is also important to note that hunters remain obliged to exercise reasonable care for the safety of other persons while hunting particularly as it relates to the discharge of firearms. In this regard, it may be entirely appropriate to erect other types of signage providing cautionary information to alert hunters to the presence of workers or ongoing exploration activities in the area. This information would assist hunters in discharging their duty to hunt in a safe manner.

Going forward we ask for the removal of all “No Hunting” signage that is more than 1000 meters away from active wood harvesting sites and in areas where no wood harvesting activities are occurring. Your timely attention to this matter is greatly appreciated. I would like to thank you for your cooperation with this matter. If you require additional clarification or information, please contact Colin Carroll, Director of Regional Services – Forestry and Wildlife at 709-637-2410.

Sincerely,

[Signature]

Colin Carroll – Director Regional Services Forestry and Wildlife
Hi Justin,

I am writing you to confirm the payment requirement for 2 Marathon Gold Corporation mineral licences which are coming due for renewal on February 10, 2020.
10 year renewal for 017230M - 256 claims x $50/claim = $12,800
10 year renewal for 017231M - 2 claims x $50/claim = $100.00

Can you please confirm these values and then I will send along a cheque to cover the payment.

Thank you,
Sherry

Sherry Dunsworth  MSc. PGeo.

SVP Exploration

Marathon Gold Corporation

s.dunsworth.moz@gmail.com

S.40.1
Ok, thanks Justin.

On Tue, Nov 12, 2019, 6:58 AM Lake, Justin W <JustinWLake@gov.nl.ca> wrote:

Hi Sherry,

You amounts are correct. You can also pay online if you wish.

Justin

Hi Justin,

I am writing you to confirm the payment requirement for 2 Marathon Gold Corporation mineral licences which are coming due for renewal on February 10, 2020.

10 year renewal for 017230M - 256 claims x $50/claim = $ 12,800

10 year renewal for 017231M - 2 claims x $50/claim = $ 100.00

Can you please confirm these values and then I will send along a cheque to cover the payment.

Thank you,

Sherry
Sherry Dunsworth  MSc. PGeo.
SVP Exploration
Marathon Gold Corporation
s.dunsworth.moz@gmail.com
Hi Sherry,

You amounts are correct. You can also pay online if you wish.

Justin

From: Sherry Dunsworth <s.dunsworth.moz@gmail.com>
Sent: Monday, November 11, 2019 2:04 PM
To: Lake, Justin W <JustinWLake@gov.nl.ca>
Subject: 10 year renewals for mineral licences 017230M and 017231M - Feb 10, 2020

Hi Justin,

I am writing you to confirm the payment requirement for 2 Marathon Gold Corporation mineral licences which are coming due for renewal on February 10, 2020.
10 year renewal for 017230M - 256 claims x $50/claim = $ 12,800
10 year renewal for 017231M - 2 claims x $50/claim = $ 100.00

Can you please confirm these values and then I will send along a cheque to cover the payment.

Thank you,
Sherry

Sherry Dunsworth  MSc. PGeo.
SVP Exploration
Marathon Gold Corporation
s.dunsworth.moz@gmail.com
Ms. Sherry Dunsworth, M.Sc., P.Geo.
V.P. Exploration
Marathon Gold Corporation
P.O. Box 160
Pasadena, NL
A0L 1K0

Dear Ms. Dunsworth:

Re: Safety of Marathon Workers and Hunting

Thank you for your email dated October 31, 2019 regarding direction received from the Department of Fisheries and Land Resources (FLR) that “No Hunting” signs can no longer cover the entire active exploration area for Marathon Gold’s Valentine Lake project. In your email you express concerns about the safety of Marathon’s workers and possible implications for the company and the project if Marathon is unable to ensure its workers have a safe work environment.

In response, the departments of NR and FLR met with you and your solicitor on November 19th to discuss this issue. Both departments recognize the importance of the mineral industry to the Province as well as the safety of those working in the industry. We are committed to working towards a solution.

The meeting was constructive, and resulted in a greater understanding of Marathon’s perspective and of the current regulatory framework around prohibition of hunting in areas with workers. We will work with our colleagues at FLR to identify potential solutions prior to the start of the next big game hunting season.

Sincerely,

SIOBHAN COADY, MHA
St. John’s West
Minister

c. Hon. Gerry Byrne
Minister of Fisheries and Land Resources
Hey Sherry

At this time, I do not believe that removing trenching from the application would speed up the overall process.

I suggest the best course would be to wait for the official feedback from EA; at this point they have only asked for further information/clarification. Once we receive their response, I can let you know and evaluate from there.

That being said, if you would like to remove the trenching, that’s no problem I can send out an amendment to the application today.
 Cheers

Matthew Snow
Exploration Approvals Geologist
NL Department of Natural Resources
Telephone (709) 729-5634
PO Box 8700, 50 Elizabeth Ave
St. John’s A1B 4J7

From: Sherry Dunsworth <s.dunsworth.moz@gmail.com>
Sent: Friday, December 13, 2019 11:48 AM
To: Snow, Matthew <MatthewSnow@gov.nl.ca>
Subject: Re: REFERRAL: E200002 Marathon Gold Corp. – Valentine Lake Property

Hi Matt,

I may just remove the trenching from this exploration application so that it is not hung up from speedy approval.

If we decide to trench next summer, then I can apply for an amendment at that time.

The reason this change is that in order to know exactly where I will be trenching, I need to be on site and walking the ground.

Do you think if the trenching is removed there will be any issue getting the drilling permit for a Jan 10 start up?

Thank you, Sherry.

Sherry Dunsworth  MSc. PGeo.
SVP Exploration
Marathon Gold Corporation
s.dunsworth.moz@gmail.com

On Thu, Dec 12, 2019 at 10:09 AM Snow, Matthew <MatthewSnow@gov.nl.ca> wrote:

Thanks Sherry.

I agree completely. We can only provide best estimates based on previous work, resource and budgeting expectations etc.

From: Sherry Dunsworth <s.dunsworth.moz@gmail.com>
Sent: Thursday, December 12, 2019 10:06 AM
To: Snow, Matthew <MatthewSnow@gov.nl.ca>
Subject: Re: REFERRAL: E200002 Marathon Gold Corp. – Valentine Lake Property
Hello Matt,

I will get this information to you later today, after a bunch of meetings.

As you know, it is difficult to locate exactly where trenches will occur as it depends on a progression from one trench to the next (i.e.: information from one trench will help decide on the location, length of another trench or whether to stop trenching in an area.

Thank you, Sherry

Sherry Dunsworth  MSc. PGeo.
SVP Exploration
Marathon Gold Corporation
s.dunsworth.moz@gmail.com

On Thu, Dec 12, 2019 at 9:28 AM Snow, Matthew <MatthewSnow@gov.nl.ca> wrote:

Hey Sherry

EA has followed up with additional requests:

Using the appropriate scale, please ask to show existing roads and trails to and in the green areas identified, and any new roads or trails (length in meters) to access each specific trench location.

Is there an estimate of how much

1. material would be removed to create the trenches (cubic meters), and
2. land needs to be cleared (hectares).

In addition, the mapping should also show proximity of the nearest impacted areas (former trenching, drill sites, clearing, etc.)

This information is necessary to screen through some EA triggers in the EA Regulations.

Matthew Snow
Exploration Approvals Geologist
NL Department of Natural Resources
Telephone (709) 729-5634
PO Box 8700, 50 Elizabeth Ave
St. John's A1B 4J7

From: Sherry Dunsworth <s.dunsworth.moz@gmail.com>
Sent: Wednesday, December 11, 2019 9:52 PM
To: Snow, Matthew <MatthewSnow@gov.nl.ca>
Subject: Re: REFERRAL: E200002 Marathon Gold Corp. – Valentine Lake Property

Hello Matt,

I have attached 2 figures showing the location of the small areas where we would like to trench proximal to the Valentine Shear Zone and also proximal to existing roads.

I have also attached a brief letter stating the rehabilitation strategy for the proposed 2020 trenching.

Please have a look and advise if anything else is needed.

Thank you, Sherry

Sherry Dunsworth  MSc. PGeo.
SVP Exploration
Marathon Gold Corporation
s.dunsworth.moz@gmail.com

On Wed, Dec 11, 2019 at 2:45 PM Snow, Matthew <MatthewSnow@gov.nl.ca> wrote:

Sherry

Environmental Assessment has come back with some questions regarding the specifics of the trenching program, as we suspected:

“Please ask for information on trench construction, operation and decommissioning. A map of the 15 trenches would help as well. There is a large area identified in the referral. Will this involve a lot of cutting?”

If you could put together a little letter to EA describing the requested details with a smaller scale map of the trenching I think that should suffice.

Cheers

Matthew Snow
Exploration Approvals Geologist
NL Department of Natural Resources
Telephone (709) 729-5634
PO Box 8700, 50 Elizabeth Ave
St. John’s A1B 4J7

From: Sherry Dunsworth <s.dunsworth.moz@gmail.com>
Hi Matt,

The 2016 EA registration was to allow Marathon to construct temporary drill access roads throughout the length of the property to allow drill rig access in 2016 and into the future along these areas located proximal to and along the shear contact with the sediments. These drill access roads were designed to allow us years of access for drilling with minimal disturbance to the environment. When we have to travel off the existing drill access roads, we cut the larger trees, and lay down a bed of small trees and branches etc. so we do not break through the ground, do the drill hole, rehabilitate the drill pad area and then upon pulling back from the drill area we "fluff" up the branches or any small brush so there is just an opening in the wooded area with little to no disturbance to the ground organic cover. Sometimes when it is more concentrated drilling, such as in the main core of the deposits, there is more disturbance but we do attempt to minimize any ruts etc. and we used to apply the NL highway grass seed mix and hay in these disturbed areas to enhance re-growth but those measures (seed and hay) are no longer allowed by Department of Environment.

I do not have the mats in use but I will send along a few photos when I obtain them.

Please do let me know if there are more maps are required.

This is an application for exploration work only and along the areas we have always had permitted. It has nothing to do with the current EA project description for future mine development.

Thanks Sherry

Sherry Dunsworth  MSc. PGeo.
SVP Exploration
Marathon Gold Corporation
s.dunsworth.moz@gmail.com

On Tue, Dec 10, 2019 at 3:28 PM Snow, Matthew <MatthewSnow@gov.nl.ca> wrote:

Sherry

If the current work is not included in the overall EA registration, then I will relay that to Environmental Assessment.

I am under the impression that they may have considered past mineral exploration applications (2016 to 2019) inherent to, and included in, the EA registration.
Nevertheless I will contact you if more is required.

The information regarding your new bog mats is very interesting. They sound similar to blasting mats used in mining to protect in-pit generators and other assets during blasts which are typically constructed of thick recycled tires. If you have some pictures of them in action please send them along.

Cheers

Matthew Snow
Exploration Approvals Geologist
NL Department of Natural Resources
Telephone (709) 729-5634
PO Box 8700, 50 Elizabeth Ave
St. John's A1B 4J7

From: Sherry Dunsworth <s.dunsworth.moz@gmail.com>
Sent: Tuesday, December 10, 2019 3:13 PM
To: Snow, Matthew <MatthewSnow@gov.nl.ca>
Subject: Re: REFERRAL: E200002 Marathon Gold Corp. – Valentine Lake Property

Hello Matthew,

The work is exploration drilling and trenching and has nothing to do with the 2016 EA registration that Marathon Gold submitted to allow for permitted construction of drill access roads at the Valentine Gold Project.

I will do more detailed maps to show the 2016 permitted drill access roads, gates and also the planned areas for 2020 exploration drilling and trenching with all the planned exploration areas accessible from the exiting drill access roads.

A side note, Marathon Gold has also just purchased 500 of the Nalcor mats that were used during the transmission line construction on wet or boggy areas. These mats are 16' wide x 4' long by 8’ thick and constructed of wooden beams bolted together and handles for placement by excavator. The idea is that in any wet or boggy area where Marathon Gold wishes to drill during winter or summer, the mats would be used to provide environmentally sound corduroy over the wet area to eliminate any disruption of the substrate. The mats are then removed when the drill hole is finished. This is a much cleaner and environmentally positive method for drilling in wet areas than the traditional use of logs to corduroy and they remove the logs. As mentioned, Nalco used these mats to very successfully move heavy equipment across wet and boggy areas during the construction of the transmission line towers all across Newfoundland and Labrador.

Please let me know if there is any additional information required beside the maps showing more detailed location of drill and trench areas as well as the existing permitted drill access roads.

Thank you, Sherry
On Tue, Dec 10, 2019 at 2:36 PM Snow, Matthew <MatthewSnow@gov.nl.ca> wrote:

Sherry

The Environmental Assessment Division has requested additional information regarding Marathon Gold’s 2020 Application for Mineral Exploration Approval. They would like to confirm whether this work specifically is (or is not) a part of the 2016 EA Registration document:

In order to expedite the exploration approval, could you please provide a detailed summary of this planned work (maybe produce a couple maps with specific drill and trench locations) and tie this into the registration document, referencing specific pages, figures, etc.

Cheers

Matthew Snow
Exploration Approvals Geologist
NL Department of Natural Resources
Telephone (709) 729-5634
PO Box 8700, 50 Elizabeth Ave
St. John’s A1B 4J7
Hello Matt,

Please find attached the Detailed Proposed Drilling Areas - VLP.

Notes to please express to EA (or I can write another letter if needed):

(1) All areas are accessible from existing drill access roads.

(2) The boggy-wet areas will be accessed using the wooden mats as a temporary "corduroy"
road.

Please let me know if anything else is needed.

Thank you, Sherry

Sherry Dunsworth  MSc. PGeo.
SVP Exploration
Marathon Gold Corporation
s.dunsworth.moz@gmail.com

On Mon, Dec 16, 2019 at 9:08 AM Snow, Matthew <MatthewSnow@gov.nl.ca> wrote:

Awesome thanks Sherry

EA called me this morning and relayed that they required more detailed information regarding the drilling aspect of the work.

Can you provide, just as you have done with the trenching, more refined areas for the drilling? They’re not looking for exact locations for every drill hole, but more well defined polygons.

Just send me the shape files and I will put together the standard maps for them

Cheers

Matthew Snow
Exploration Approvals Geologist
NL Department of Natural Resources
Telephone (709) 729-5634
PO Box 8700, 50 Elizabeth Ave
St. John's A1B 4J7

From: Sherry Dunsworth <s.dunsworth.moz@gmail.com>
Sent: Sunday, December 15, 2019 1:32 PM
To: Snow, Matthew <MatthewSnow@gov.nl.ca>
Subject: Additional information for trenching - Valentine Gold Project

Hello Matt,

Please find attached:

(1) detailed proposed trenching map,
(2) .shp files for the trench areas and actual trenches
(3) signed letter with additional trench information.

Please let me know if anything else is required.

Thank you,
Sherry

Sherry Dunsworth  MSc. PGeo.
SVP Exploration
Marathon Gold Corporation
s.dunsworth.moz@gmail.com
From: Snow, Matthew <MatthewSnow@gov.nl.ca>
Sent: Tuesday, January 28, 2020 3:57 PM
To: Hynes, Rodney (NR) <RHynes@gov.nl.ca>
Subject: FW: Progress with Exploration Approval referral number E200002 (Marathon Gold Corporation)

From: Watton, Eric <ericwatton@gov.nl.ca>
Sent: Monday, December 30, 2019 3:29 PM
To: 'Sherry Dunsworth' <s.dunsworth.moz@gmail.com>
Cc: Snow, Matthew <MatthewSnow@gov.nl.ca>; Sweeney, Joanne <joannesweeney@gov.nl.ca>
Subject: RE: Progress with Exploration Approval referral number E200002 (Marathon Gold Corporation)

Dear Ms. Dunsworth,

Thank you for providing all of the information thus far. The main access roads were reviewed. I have the trench locations as Matthew provided.

Do you have mapping for general drill hole locations (smaller areas will be fine). You have mentioned wetland crossings. I did not conduct the review for the Nalcor work that you refer but I understand that this mapping method was included via their specific EA review.
Any idea how many wetland crossings there will be? What is the largest wetland area that may be crossed? I do not have the capability to view wetlands versus forested lands underlain by mineral soils. If possible, can you please provide PDF and cc Matthew.

My director should be in again tomorrow and I will try to discuss with her in the morning.

Thank you,
Eric

Eric Watton, M.Sc.
Environmental Scientist
Department of Municipal Affairs and Environment
Environmental Assessment Division, Environment Branch
P.O. Box 8700
St. John’s NL A1B 4J6
t. 709.729.0834

From: Sherry Dunsworth <s.dunsworth.moz@gmail.com>
Sent: Monday, December 30, 2019 2:32 PM
To: Watton, Eric <ericwatton@gov.nl.ca>
Cc: Snow, Matthew <Matthewsnow@gov.nl.ca>
Subject: Re: Progress with Exploration Approval referral number E200002 (Marathon Gold Corporation)

Hello Eric,

Thank you for this information and forwarding on to your Director.

At this time, do you have any sense on if we will be able to proceed with the winter drilling program or is there already an indication that there is likely a longer time required for the approval? If there is a likely delay, than it is better if I am aware sooner than later so that I can make changes to current plans for crew returning to their jobs and also so I can advise the drilling company of delayed start so they can advise their crews?

Thank you, Sherry

Sherry Dunsworth MSc. PGeo.
SVP Exploration
Marathon Gold Corporation
s.dunsworth.moz@gmail.com
On Mon, Dec 30, 2019 at 2:13 PM Watton, Eric <ericwatton@gov.nl.ca> wrote:

Dear Ms. Dunsworth,

I will forward this information along to my director. The referral is in process.

Thank you,
Eric

Eric Watton, M.Sc.
Environmental Scientist
Department of Municipal Affairs and Environment
Environmental Assessment Division, Environment Branch
P.O. Box 8700
St. John’s NL A1B 4J6

t. 709.729.0834

From: Sherry Dunworth <s.dunsworth.moz@gmail.com>
Sent: Monday, December 30, 2019 2:08 PM
To: Watton, Eric <ericwatton@gov.nl.ca>
Cc: Snow, Matthew <MatthewSnow@gov.nl.ca>
Subject: Progress with Exploration Approval referral number E200002 (Marathon Gold Corporation)

Hello Eric,

I am curious if there has been any movement forward for Marathon Gold Corporation's 2020 Exploration Approval application covering targeted drilling and minor trenching at the Valentine Lake gold property?

I currently have crew scheduled to return to work again at the property on [redacted] and hoping to start drilling on [redacted].

Please advise if you require any additional information related to the drill and trench plans as well as remediation information that I had already forwarded during December. I again stress that we are working proximal to our existing permitted drill and trench access roads which were planned in 2016 to allow future exploration along the highly perspective Valentine Shear Zone without requiring any additional road or path development. For drilling, we will be cutting a few trees where necessary (our Commercial Cutting Permits for Districts 12 and 13 will be renewed in 2020) and using the wooden mats (16' wide x 4' long x 8" thick bolted wooden timber - purchased from Nalcor as they used over wet or boggy areas to access for the transmission line installation) to access drill targets on any of
the wet or boggy areas. We also plan to drill wetter or potentially more sensitive areas during the winter when there is a thick snow and ice cover.

Marathon Gold Corporation has taken great pride in our environmental stewardship over the 10 years we have been exploring at the Valentine Property and have had excellent reports from all past site inspections by Departments of Natural Resources (Jim Hinchey, Ken Andrews, Heather Rafuse, Matt Snow) and Environment (Brent Keeping).

Thank you for your attention to this matter and again, please let me know if there is any additional information I can supply or if you wish to speak in person. I have been SVP Exploration for this project since the very beginning and been on site at the Valentine project and did all the previous 10 years of permitting, planned all the drilling, trenching etc. since January 2010. Therefore, I can supply an abundance of background information should it be required to assist with future exploration approval.

Sincerely,

Sherry

Sherry Dunsworth MSc. PGeo.
SVP Exploration
Marathon Gold Corporation
s.dunsworth.moz@gmail.com
January 3, 2020

E200002

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

Dear Mr. Dunsworth:

Exploration Approval (200 DDH, 15 Trenches, Fuel Storage, Ground Geophysics, Prospecting) for Marathon Gold Corp. on the Valentine Lake Property, NTS: 12A/06, 12A/07

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 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 licensee shall obtain prior written permission and forward copies to the Mineral
   Lands Division. Information regarding private land may be found on Crown Lands' Land Use
   Atlas: https://www.gov.nl.ca/landuseatlas/details/

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://gls.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/department/contact.html#locations

10. The Proponent shall comply with the Forestry Act and regulations. The Proponent is advised
    to contact the nearest Forest Management District Office 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);
        c. During the Forest Fire Season a permit to burn must be obtained to ignite a fire on or
           within 300 meters of forest land.

    Regional and Satellite Forestry contact information can be found at
    http://www.fir.gov.nl.ca/department/contact_forestry.html#regional

11. 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: http://www.dfo-
    mpo.gtgc.ca/pnw-ppe/index-eng.html.
12. 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.

13. 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 hydroseeding. 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.

14. 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.

15. 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.

16. 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.

17. 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

18. 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.
19. 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.
- 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 entrainment 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.

20. 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.

21. 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.

22. 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.

23. 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.

24. 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.
25. 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 and Investigations 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.

26. The exploration program is taking place within an 8 km buffer surrounding an outfitter(s) camp. It is required that the Proponent take this into consideration when planning exploration activities, and coordinate with the outfitter(s) to avoid detrimental impacts and mitigate conflict on respective activities. Their contact information is:

**Everett Kinden** of Kinden’s Quinn Lake Outfitters Ltd. (Quinn Lake Lodge spike camp is inside boundary), P.O. Box 787, 46 Centennial Drive, Lewisporte, NL, A0G 3A0, Tel: 709-535-8811, Email: 1. info@kindensoutfitters.com, Website: 1. www.kindensoutfitters.ca

**Randy Parsons** of Notch Mountain Outfitters Inc. (Valentine Lake Spike camp is inside boundary), P.O. Box 462, Buchans, NL, A0H 1G0, Tel: 709-672-8607/709-672-3589, Email: 2. Website: 2. www.notchmountainoutfitters.com

**Leonard McCarthy** of Caribou Cove Outfitters Ltd. (Moose Lodge is 5 km from boundary), 622 Sackville Drive, Unit 1-B, Lower Sackville, NS, B4C 2S3, Tel: 902-209-0099, Email: 3. Website: 3.

27. Please be advised that EA registration is not required for this work as applied for because the proposed work will be on approved areas as defined in the Motor Vehicles and All-Terrain Vehicles Regulations under the Motorized Snow Vehicles and All-Terrain Vehicles Act. The EA Division must be notified if there is any deviation to this or if any roads are to be built greater than 500 meters from an existing Right of Way.

28. 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.

29. The Wildlife Division advises applicants to operate under established legislation and regulations, such as to prevent harassment of wildlife (Section 106 of the Wild Life Regulations under the Wild Life Act) and guidance with respect to wildlife and their habitats (e.g. nesting birds, caribou, waterfowl, wetlands, inland fish, rare plants, riparian species) to avoid or minimize adverse impacts.

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 startle 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 Wildlife Division requires a minimum 30 m naturally vegetated buffer to be maintained along all waterbodies and wetlands to protect sensitive riparian and aquatic species, and their habitat.

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.

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.
This approval is due to expire on January 3, 2021.

If you have any questions concerning this approval, please contact the Mineral Lands Division at exploration_approval@gov.nl.ca

Regards,

[Signature]

Matthew Snow,
Exploration Approvals Geologist
From: Snow, Matthew <MatthewSnow@gov.nl.ca>
Sent: Tuesday, January 28, 2020 3:57 PM
To: Hynes, Rodney (NR) <RHynes@gov.nl.ca>
Subject: FW: Approval E200002 for Marathon Gold Corp.

From: Sherry Dunsworth <s.dunsworth.moz@gmail.com>
Sent: Monday, January 27, 2020 1:44 PM
To: Snow, Matthew <MatthewSnow@gov.nl.ca>
Cc: Sheppard, Kevin <KevinSheppard@gov.nl.ca>; Hinchey, Stephen <StephenHinchey@gov.nl.ca>; Smith, Alex O. <asmith@gov.nl.ca>
Subject: Re: Approval E200002 for Marathon Gold Corp.

Hello Matt,

I wanted to sincerely thank you, and the other people within the department, for the effort spent on assisting Marathon Gold Corporation in obtaining this very satisfactory compromise regarding timing of exploration activities within the Valentine Gold Project area and care for our provinces caribou and their migration path.

Regards, Sherry

Sherry Dunsworth  MSc. PGeo.
On Mon, Jan 27, 2020 at 12:13 PM Snow, Matthew <MatthewSnow@gov.nl.ca> wrote:

Sherry

As you are aware, a compromise was reached between the Wildlife Division and Marathon Gold Corp. with respect to the mineral exploration work limitations on the Valentine Lake property.

To summarize:

- Restrictions for drilling and trenching will apply during the spring and fall migration periods. This will include April 15 through May 31 in the spring, and November 1 through December 15 in the fall.
- The restriction periods will apply only to the northeastern area of the property, as defined by the line indicated on the attached map.

The amendment for this approval is still in process.

If you have any other questions or concerns please let me know.

Matthew Snow
Exploration Approvals Geologist
NL Department of Natural Resources
Telephone (709) 729-5634
PO Box 8700, 50 Elizabeth Ave
St. John’s A1B 4J7

From: Snow, Matthew
Sent: Friday, January 03, 2020 10:58 AM
To: Sherry Dunsworth <s.dunsworth.moz@gmail.com>
Cc: Sheppard, Kevin <KevinSheppard@gov.nl.ca>; Lawlor, Bernadine <BernadineLawlor@gov.nl.ca>; Brake, Jamie <JamieBrake@gov.nl.ca>; Sheppard, John <JohnSheppard@gov.nl.ca>; Mostofi, Shabnam <ShabnamMostofi@gov.nl.ca>; Hinchey, Stephen <StephenHinchey@gov.nl.ca>; Alway, Lucy <lucyalway@gov.nl.ca>; Watton, Eric <ericwatton@gov.nl.ca>
Subject: Approval E200002 for Marathon Gold Corp.

Mrs. Dunsworth

See attached approval for mineral exploration on the Valentine Lake Property. Please carefully review the conditions, particularly the attached detailed response from the Department of Fisheries and Land Resources (FLR) regarding the regional Newfoundland caribou herds and timing restrictions for drilling and trenching activities.

Cheers
Matthew Snow
Exploration Approvals Geologist
NL Department of Natural Resources
Telephone (709) 729-5634
PO Box 8700, 50 Elizabeth Ave
St. John's A1B 4J7
Hey John

Attached are more detailed maps and GIS areas supplied by the company at an earlier request by the Environmental Assessment Division. Also this message:

Please find attached the Detailed Proposed Drilling Areas - VLP.

Notes to please express to EA (or I can write another letter if needed):

(1) All areas are accessible from existing drill access roads.
(2) The boggy-wet areas will be accessed using the wooden mats as a temporary "corduroy" road.

Please let me know if anything else is needed.

I recommend that in the interest of expediency, if the Wildlife Division requires more information beyond that they contact the proponent directly. She will be able to provide any information required, and speak to the sequencing of the work and how to best meet the needs of both the company and Wildlife Division:

**Sherry Dunsworth  MSc. PGeo.**
SVP Exploration
Marathon Gold Corporation
s.dunsworth.moz@gmail.com

Thank you for your efforts on this file.

**Matthew Snow**
Exploration Approvals Geologist
NL Department of Natural Resources
Telephone (709) 729-5634
PO Box 8700, 50 Elizabeth Ave
St. John's A1B 4J7

---

**From:** Sheppard, John <JohnSheppard@gov.nl.ca>
**Sent:** Thursday, January 16, 2020 1:07 PM
**To:** Snow, Matthew <MatthewSnow@gov.nl.ca>
**Subject:** FW: REFERRAL: E200002 Marathon Gold Corp. – Valentine Lake Property

Hi Matthew,

Please see below from Wildlife – would it be possible to get more details as requested?

Thanks,
John

**John Sheppard**
Policy, Planning & Research Analyst (IM)
Department of Fisheries and Land Resources
Government of Newfoundland and Labrador
709.729.1140
From: Adams, Blair <BlairAdams@gov.nl.ca>
Sent: Thursday, January 16, 2020 12:44 PM
To: Sheppard, John <JohnSheppard@gov.nl.ca>; Soper, Leah <LSoper@gov.nl.ca>
Cc: Barney, Wayne <waynebarney@gov.nl.ca>; Balsom, Stephen <StephenBalsom@gov.nl.ca>; Soper, Leah <LSoper@gov.nl.ca>
Subject: RE: REFERRAL: E200002 Marathon Gold Corp. – Valentine Lake Property

John,

Can we get more details on the specific drilling plan? If we can tailor the activity to south eastern portion of the site during peak migratory periods I think we can find a compromise.

Blair Adams
Director, Wildlife Division

m 709-424-0412
o 709-637-2372

From: Sheppard, John <JohnSheppard@gov.nl.ca>
Sent: Tuesday, January 7, 2020 11:23 AM
To: Soper, Leah <LSoper@gov.nl.ca>
Cc: Adams, Blair <BlairAdams@gov.nl.ca>; Barney, Wayne <waynebarney@gov.nl.ca>; Balsom, Stephen <StephenBalsom@gov.nl.ca>
Subject: FW: REFERRAL: E200002 Marathon Gold Corp. – Valentine Lake Property

Good morning,

Please see below feedback from the applicant in regards to the proposed exploration program on the Valentine Lake Property by Marathon Gold Corp for your review.

Thanks,
John

John Sheppard
Policy, Planning & Research Analyst (IM)
Department of Fisheries and Land Resources
Government of Newfoundland and Labrador
709.729.1140

From: Snow, Matthew <MatthewSnow@gov.nl.ca>
Sent: Friday, January 3, 2020 3:51 PM
To: Sheppard, John <JohnSheppard@gov.nl.ca>
Cc: Murphy, Gordon <gordonmurphy@gov.nl.ca>; Sheppard, Kevin <KevinSheppard@gov.nl.ca>
Subject: RE: REFERRAL: E200002 Marathon Gold Corp. – Valentine Lake Property
Hey John

We have received feedback from the applicant in regards to the proposed exploration program on the Valentine Lake Property by Marathon Gold Corp.

Background: The Valentine Lake Project represents what could be the largest gold deposit in Atlantic Canada and is the most advanced exploration project in the province of Newfoundland and Labrador. It has been under rigorous exploration (including baseline environmental studies) for at least 6 recurrent years. Four separate deposits have been outlined to date occurring over a 20-kilometre system of gold-bearing veins, with a current resource estimate totaling approximately 4.0 million ounces of gold. Support through the provincial mineral incentive program over the years has contributed $1.5 million and the future mining undertaking has been registered for environmental assessment under the Environmental Protection Act. The development of this major natural resource is consistent with the provincial government’s goal of continuing to support and encourage the growth of the mining industry as outlined in the Mining the Future 2030 plan.

We would like to seek clarification with regards to the work restrictions imposed by the Wildlife Division, specifically for drilling. As per the referral response from FLR:

“Due to the intersection of this property and the proposed activities with core habitat and seasonal habitat use for the Buchans, Topsails, Grey River and Lapoile herds, the Wildlife Division requires that the high impact exploration activity of drilling not take place during the timespan when caribou are utilizing this area. The Wildlife Division requires that all Drilling activity not take place until Jan 1 and be completed by April 15.”

Impact: We understand that this restriction will impose a severe adverse effect on the work program and development of the resource, eliminating the bulk (8 months) of the operational drilling season. As mentioned previously, to meet resource development industry standards and expectations, intensive exploration work (including drilling) is conducted on the property year-round, and has been since at least 2014.

Possible Solution: Is this work restriction applied broadly to the entirety of the work area as proposed in the referral? If not, and the restrictions are only applied to those areas identified as migration routes, is it possible for the Wildlife Division to present some additional guidance that the applicant can work with? May we suggest that the restriction timelines be applied to an well-defined buffer area around and including the core of the migration route, e.g. 500 meters to the East and West? This area would have to be defined by the Wildlife Division, but would be an acceptable compromise allowing the company to prioritize their work program in this area and complete it within the established time window carrying out the remaining work as their schedule allows.

Request: Is it possible to receive the caribou collar data ‘Fig. 1. Buchan’s Caribou Migration Route Based on Telemetry Information (GPS Collars only)’ color coded based on year (chronological)? Also, would it be possible for the Wildlife Division to provide the raw data for this or any other caribou related data in an ArcGIS capable format (Shapefile) to the Mineral Lands Division? It would greatly help our efforts to better understand the distribution of these migrations, and better inform the industry of potential for conflicting land use.
Consideration: A similar situation regarding Newfoundland Caribou restrictions conflicting with mineral exploration work was identified and addressed last fall. The company in that circumstance was unsatisfied with the regular processes and wrote a letter outlining their dissatisfaction to the Minister of Natural Resources. After a significant time delay it is my understanding that the Deputy Ministers of our respective departments decided that a secondary review by the Wildlife Division was required, and given the circumstances, a compromise was reached and the restriction reduced. It is our hope that these additional steps can be avoided this time around, and a compromising resolution can be reached.

Thank you in advance for your consideration.

Matthew Snow  
Exploration Approvals Geologist  
NL Department of Natural Resources  
Telephone (709) 729-5634  
PO Box 8700, 50 Elizabeth Ave  
St. John's A1B 4J7

From: Sheppard, John <JohnSheppard@gov.nl.ca>  
Sent: Thursday, December 19, 2019 11:29 AM  
To: Snow, Matthew <MatthewSnow@gov.nl.ca>  
Cc: Murphy, Gordon <gordonmurphy@gov.nl.ca>  
Subject: RE: REFERRAL: E200002 Marathon Gold Corp. – Valentine Lake Property

Hi Matthew,

Please see attached comments from Fisheries and Land Resources for E200002.

Thank you,
John

John Sheppard  
Policy, Planning & Research Analyst (IM)  
Department of Fisheries and Land Resources  
Government of Newfoundland and Labrador  
709.729.1140

From: Snow, Matthew <MatthewSnow@gov.nl.ca>  
Sent: Tuesday, December 3, 2019 3:40 PM  
To: Brake, Jamie <JamieBrake@gov.nl.ca>; Mercer, Delphina <dhmercer@gov.nl.ca>; Erwin, John <johnErwin@gov.nl.ca>; EA Project Comments <EAProjectComments@gov.nl.ca>; Sheppard, John <JohnSheppard@gov.nl.ca>; Shute, Dean <DeanShute@gov.nl.ca>; McDonald, Tammy A <TammyMcDonald@gov.nl.ca>; Referrals_WRMD <Referrals_WRMD@gov.nl.ca>; Alway, Lucy <lucyalway@gov.nl.ca>  
Cc: Sheppard, Kevin <KevinSheppard@gov.nl.ca>  
Subject: REFERRAL: E200002 Marathon Gold Corp. – Valentine Lake Property
REFERRAL: E200002 Marathon Gold Corp.– Valentine Lake Property

The Department of Natural Resources Mineral Lands Division has received an application for Exploration Approval from the company/individual for the activity listed below.

File E200002

Exploration Approval (200 DDH, 15 Trenches, Fuel Storage, Ground Geophysics, Prospecting) for Marathon Gold Corp. on the Valentine Lake Property,
NTS: 12A/06, 12A/07

This e-mail and any transmitted files are considered confidential and for the use of the person(s) to whom they are addressed. The information attached (e.g., .pdf files) is confidential; please take the necessary steps to ensure the confidentiality of this information.

Your comments and/or approval conditions and/or permit requirements regarding the above work is requested. If you have any questions or require further information, please contact the undersigned.

If we do not receive a reply within 14 days we will proceed with the approval on the assumption that you have no issues of concern.

Matthew Snow
Exploration Approvals Geologist
NL Department of Natural Resources
Telephone (709) 729-5634
PO Box 8700, 50 Elizabeth Ave
St. John’s A1B 4J7
January 8, 2020

Re: Implementation of new Mineral Lands Administration Portal

Attention Mineral License Holder,

As you may be aware, the Mineral Lands Division are developing a new online portal to replace the MIRIAD online staking system. This portal will incorporate up to date technology to improve reliability of the system and will contain a significant number of new features.

Clients will be given significantly more tools to manage their licenses. These tools include:

- A list of all licenses registered to the client and their relevant dates upon login
- Assessment report submission tool
- 60-day extension request form
- License renewal request and payment
- Condition 2 extension request and payment
- Map submission tool for requests to split, group and partially surrender licenses

The online portal will also send email reminders 30 days before work due dates, renewal dates and report due dates. As a result of these reminders, and as previously communicated on July 25, 2019, the Mineral Claims Recorder will no longer reinstate licenses that are cancelled due to failure to submit assessment work or expired due to non-payment of renewal fees once the new system is operational. As a result, clients are advised to pay close attention to due dates for reports, extensions and renewals.

The MIRIAD online staking system is currently offline and no claim staking will be possible until the new portal is operational. Currently the new portal is scheduled to be made available to clients on January 27, 2020. Clients will be able to access staking and the new functions of the portal on this date. If there should be any change to this date, clients
will be notified by email.

In the coming days a training video will be posted providing a detailed demonstration of the portal. This video will run through all major functions of the new portal. Clients will be notified by email when this is available.

Yours sincerely,

[Signature]

Justin Lake
Manager, Mineral Rights
January 14, 2020

Re: Portal Update

Attention Mineral License Holder,

As of January 12, 2020, the Mineral Lands Online Portal has begun to send reminder notices with regards to work due dates, report due dates and expiry dates. These notices direct the recipient to login to the portal to complete license tasks. The online portal will not be available until January 27, 2020, so all functions related to mineral licenses should be completed in the normal fashion, with extensions requests and assessment reports sent to mlassessments@gov.nl.ca.

It has also been noted that the portal is sending report due notices to license holders who have previously obtained 60 day extensions to submit work reports. These notices were sent in error and all previously approved 60-day extensions remain in effect. Report due dates remain unchanged for licenses with these extensions.

As a reminder, cancelled or expired mineral licenses will not be reinstated after the online portal becomes available for clients.

If you have questions or concerns please contact the undersigned at justinwlake@gov.nl.ca.

Yours sincerely,
Justin Lake
Manager, Mineral Rights