December 27, 2018

Dear Applicant:

Re: Your request for access to information under Part II of the Access to Information and Protection of Privacy Act FLR/120/2018

On November 27, 2018, the Department of Fisheries and Land Resources (FLR) received your request for access to the following records:

"I am requesting any / all information pertaining to a company called Marathon Gold Corporation and interactions with this government dept."

Please be advised that a decision has been made by the Deputy Minister for FLR to provide access to the requested information. Redactions have been made under Section 40(1) – Personal Privacy, Section 29 – Policy Advice and recommendations, Section 30 – Legal advice, and Section 39 – Third Party harm, pages 71,143 and 145 have been removed in their entirety. Section 35 – Disclosure harmful to the economic interests of a public body of the Access to Information Protection of Privacy Act, 2015. You will find a copy of responsive material attached.

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 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

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 this letter 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 Office of Public Engagement's 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 contact me by telephone at 709-729-3730 or by email at HollyWarford@gov.nl.ca.

Sincerely,

Holly Warford
ATIPP Coordinator

Right of access

8. (1) A person who makes a request under section 11 has a right of access to a record in the custody or under the control of a public body, including a record containing personal information about the applicant.

(2) The right of access to a record does not extend to information excepted from disclosure under this Act, but if it is reasonable to sever that information from the record, an applicant has a right of access to the remainder of the record.

(3) The right of access to a record may be subject to the payment, under section 25, of the costs of reproduction, shipping and locating a record.

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).
Pursuant to the Water Resources Act, 2002 cW-4.01 Section(s) 36

Date: 12 April 2011

Owner: Marathon Gold Corporation/Mountain Lake Res.
c/o Ceccon Central Engineering Consultants of Newfoundland Limited
93 Edinburgh Avenue
Gander, NL
A1V 1C9

File No. SS1195A

Approval No.SS11-041195A

To: SEWAGE DISPOSAL SYSTEM FOR VICTORIA LAKE CAMP, NEWFOUNDLAND

Approval is hereby given for the installation of a sewage disposal system as described in drawings entitled “Proposed Septic System Site Plan & Associated Details, Dwg. No. 1 of 2 Rev. 2, dated Feb. 2011”, “Proposed Steel Septic Tank, Dwg. No. 2 of 2b, dated March 2011” and design details as submitted by Ceccon Limited on June 15, 2010 and revised on 24 March 2011.

This approval does not release the proponent from the obligation to obtain appropriate approvals from other concerned provincial, federal, and municipal agencies.

This approval is subject to the terms and conditions indicated in Appendix A (attached).

It should be noted that prior approval of any significant change in the design or installation of the proposed works must be obtained from the Department of Government Services.

Failure to comply with the terms and conditions will render this approval null and void, place the proponent and their agent(s) in violation of the Water Resources Act, 2002 cW-4.01, and make the proponent responsible for taking any remedial measures as may be prescribed by this Department.

MINISTER
APPENDIX A

1. The works proposed in this undertaking must meet the requirements of the latest applicable codes and standards and in particular, the Government of Newfoundland and Labrador "Guidelines for the Design, Construction, and Operation of Water and Sewage Systems".

2. All necessary measures shall be taken to prevent damage to land, vegetation, and water courses, and to prevent pollution of bodies of water by labour force, equipment, and construction operations. Water pumped from excavations and work areas and discharged directly or indirectly to receiving waters shall comply with The Environmental Control Water and Sewage Regulations, 2003.

3. The approval of the sewage disposal system is based on a peak sewage flow of 9900 Litres per day.

4. Storm run-off from roofs, footings, and parking lots shall not enter the septic tank, and shall be directed away from the disposal field area.

5. Vehicular access to the disposal field area and septic tank shall be prohibited by barrier or natural grade. The entire disposal area must be landscaped by sodding or seeding within two months after the completion of the work. An annual effort must also be made to prevent the encroachment of trees and scrub brush.

6. Minimum percolation time for imported material shall be nineteen (19) minutes. Percolation tests shall be performed on the imported material to verify actual percolation time. These test results shall be submitted to the Government Service Centre in St. John's for review prior to placement of the distribution piping.

7. All piping (exclusive of tile field) to be non-perforated 150 mm diameter (min.), CSA approved, PVC or ABS.

8. The bottom of the tile field shall be at all points at least 900 millimetres above the maximum elevation of the ground water table, bedrock, or other impervious stratum located in the area of the bed.

9. The septic tank(s) shall be inspected annually and shall be pumped out as necessary (normally every 2 years). Septage must be removed, transported, and disposed of by an operator approved by this Department. Failure to pump out a septic tank can result in carry-over of sludge or scum to the disposal field, causing soil clogging and failure.

10. The total length of distribution pipe (minimum) in the disposal field shall be 487.0 metres.

11. The maximum length per line of distribution pipe shall be 29.0 metres.

12. Distribution pipe shall be bedded in gravel or broken stone 19 millimetres to 28 millimetres in size and which has been washed or screened to remove fine material. The bedding stone shall extend a minimum of 150 millimetres below the bottom of the distribution pipe to a level 75 millimetres above the pipe.

13. The ends of the distribution pipes in the disposal field shall be capped or interconnected with solid pipe.

14. The minimum separation distances as specified in the Guidelines for the Design, Construction & Operation of Water and Sewage Systems for the septic tank and disposal field must be maintained at all times.

15. Prior notice of 3 working days shall be provided to the Government Service Centre by telephoning (709) 292-4367 before backfilling and/or operation of the septic tanks, drain chamber and disposal field.
16. Supervision by the Consulting Engineer or representative will be required to ensure that the system is installed with considerable care and that specific attention to detail be maintained throughout and that the work on site is properly supervised and adheres to the design and conditions outlined in this Approval.

17. Any changes in the proposed work shall be approved by this Department before being implemented. Copies of this Approval shall be provided to the contractor(s) who will be carrying out these works.

18. This Approval is valid for two years from the date of issue. Installation must be completed by that date or the application and approval procedure must be repeated.

cc: Dept. of Government Services and Lands
Government Service Centre
Attn.: Mr. Karl Borne
3 Cremer Avenue
A2A 1W9
Potential copyright material

If you wish to obtain a copy please contact the ATIPP Office at (709) 729-7072 or atippoffice@gov.nl.ca.
This referral has been sent to you for your recommendation. Other referrals have been sent to the Department(s) and/or agencies on the attached schedule. YOU HAVE THIRTY (30) DAYS FROM THE DATE OF THIS REFERRAL TO PROVIDE YOUR RECOMMENDATION ON THIS APPLICATION.

Please be advised that the site on the attached map cannot be altered or relocated in any way without the prior approval of the Regional Lands Office.

**APPLICATION FOR CROWN LANDS - REFERRAL**

Applicant: [redacted]

Telephone: [redacted]

Application Number: [redacted]

Application Type: Licence

Purpose: Temporary Work Camps

Location: Victoria Lake

Area (hectares): 0

Perimeter (metres): 0

Map Number: [redacted]

Comments:

RECOMMENDATION:

[ ] Approval [ ] Refusal [ ] Held for further investigation

COMMENTS:

[Redacted]

Signature: [Redacted]  Phone No.: [Redacted]  Date: [Redacted]  

Please Return Only The Cover Sheet With Recommendations And Any Attachments You May Have.
Application Acknowledgement

Crown Land Referral

File No. 35810

Date: May 28, 2009

Applicant: [Redacted]

Purpose: Temporary Work Camp

Location: Victoria Lake

Application No. 43399

File Reference No. 2026025

The Government Service Centre would have no objection to this proposal adhered to:

Water and Sewer

1. Approved subject to the applicant submitting plans and receiving approval for the proposed water and sewerage system. Systems in excess of 4546 litres must be in compliance with the Environmental Control Water and Sewage Regulations and the Guidelines for the Design, Construction and Operation of Water and Sewerage Systems and require certified engineering drawings and specifications. Systems less than 4546 litres must be in conformity with the Statutory Regulations and Standards of Accepted Practice for On-Site Sewage Disposal System and prepared by an approved designer.

General

1. Any alteration of a natural water body, work within 15 metres of a water body, or development within a protected water supply area will require prior approval by the Water Resources Division of the Department of Environment and Conservation. Alteration of a water body may include culvert installations, stream crossings, outfalls, infilling, or bridge, dam, and wharf construction.

2. If at any time this operation is deemed to be causing 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.

3. Application must be made for Fire/Life Safety (Request for Approval of Plans Form) and Building Accessibility (Application for Building Accessibility Registration Form) review/approval.

4. Development must not extend within 200 m of a scheduled salmon river without prior registration and release under the Environment Assessment Act, Department of Environment and Conservation, Environmental Assessment Division.

5. Upon closure of the operation, the site must be rehabilitated to the satisfaction of the Department. All materials, equipment, buildings and waste are to be removed from the site and disposed of in accordance with Part IV of the Environment Protection Act.

Waste

1. All waste material generated during the construction and operation of the facility shall be considered, prior to disposal, for reuse, resale or recycling.

2. Other waste material generated on-site is to be placed in suitable refuse containers and removed to an approved waste disposal site on a weekly basis, with the approval of the site owner/operator. Refuse containers shall be placed at all active areas for use by construction crews and employees.

3. Derelict vehicles, scrapped equipment and other debris are not to be stored on-site. Such material is to be removed to an approved waste disposal site or scrap yard on a regular basis, with the approval of the site owner/operator.

4. The site is to be kept neat and tidy at all times.

5. Any cut brush should be chipped/shredded, burned on-site or removed to an approved waste disposal site for burning with the approval of the Department of Natural Resources and the owner/operator of the waste disposal site.

6. Tires and used or waste oil is not to be used to aid in the burning of brush.
Gasoline and Associated Products:

1. All drum based fuel storage facilities are to comply with the Provincial Environmental Guidelines For Drum-Based Petroleum Products Storage and Operation. Approval is required from Government Service Centre prior to installation of a facility exceeding ten drums.

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 registration, by the Government Service Centre, prior to installation.

3. All fuel storage tank systems connected to a heating appliance of a capacity of 2,500 litres or less must comply with the Heating Oil Storage Tank System Regulations.

4. The storage, handling and disposal of used oil and lubricants must comply with the Used Oil Control Regulations, NLR 82/07.

5. Floor drains from service bays or other areas handling used or waste oils are to be routed through an oil water separator to remove oily waste before being discharged. Plans and specifications must be submitted for review and approved by Government Service Centre prior to installation.

6. At fuel storage and handling locations 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 spillage debris, should be issued in an accessible location on-site. Personnel working on the project should be knowledgeable about response procedures. The applicant/proponent should consider developing a contingency plan specific to the proposed undertaking to enable a quick and effective response to a spill event.

7. Any spill or leak of gasoline or associated product is to be reported immediately to the Department of Government Services by calling the Canadian Coast Guard Environmental Emergency line at 772-2093 or 1-800-563-9089.

8. All spills or leaks of petroleum product must be remediated to the satisfaction of the Government Service Centre and the Department of Environment and Conservation.
This referral has been sent to you for your recommendation. Other referrals have been sent to the Department(s) and/or agencies on the attached schedule. YOU HAVE THIRTY (30) DAYS FROM THE DATE OF THIS REFERRAL TO PROVIDE YOUR RECOMMENDATION ON THIS APPLICATION.

Please be advised that the site on the attached map cannot be altered or relocated in any way without the prior approval of the Regional Lands Office.

APPLICATION FOR CROWN LANDS - REFERRAL

Applicant:

Telephone: (H): [Redacted]

Application Number: 133793

Application Type: Licence

Purpose: Temporary Work Camps

Use:

Location: Victoria Lake

Area (hectares): 0

Frontage (metres): 0

Map Number: [Redacted]

Comments:

RECOMMENDATION:

[ ] Approval  [ ] Refusal  [ ] Held for further investigation

COMMENTS:

________________________________________

Signature  Phone No.  Date

[Redacted]  729-5634  May 27, 09

Please Return Only The Cover Sheet With Recommendations And Any Attachments You May Have.
FORESTRY DIVISION
DEPT. OF FOREST RESOURCES & AGRIFOODS
P.O. BOX 220
ST. JOHN'S, NL A1C 1Z0

This referral has been sent to you for your recommendation. Other referrals have been sent to the Department(s) and/or agencies on the attached schedule. YOU HAVE THIRTY (30) DAYS FROM THE DATE OF THIS REFERRAL TO PROVIDE YOUR RECOMMENDATION.

Please be advised that the site on the attached map cannot be altered or relocated without the prior approval of the Regional Land Office.

APPLICATION FOR CROWN LANDS - REFERRAL

Application: Sec 40(1)

Telephone: Sec 40(1)

Application Number: 1375

Application Type: License

Purpose: Temporary Work Camp

Location: Victoria Lake

Area (hectares): 0

Fencing (metres): 0

Map Number: 

Comments: 

RECOMMENDATION:

Approval

Refusal

Held for further investigation

COMMENTS: 

Signature: Mayor's Office

Date: May 1, 2020

Please return only the cover sheet with recommendations and any attachments you may have.

From: Tel. No: 709-729-3000, Fax: 709-729-3092, Website: www.gov.nl.ca - peel 933 - 732 - 1479
Newfoundland Labrador

In Reply Please Quote:
File Reference No. 2026025

DEPT OF NATURAL RESOURCES
ATT: Jeff Moriarty, Silvertown and Research Div.
Fortis Building, P.O. Box 2005
Conna Brook NL
A2H 6L8

This referral has been sent to you for your recommendation. Other referrals have been sent to the Department(s) and/or agencies on the attached schedule. YOU HAVE THIRTY (30) DAYS FROM THE DATE OF THIS REFERRAL TO PROVIDE YOUR RECOMMENDATION ON THIS APPLICATION.

Please be advised that the site on the attached map cannot be altered or relocated in any way without the prior approval of the Regional Lands Office.

APPLICATION FOR CROWN LANDS - REFERRAL

Applicant: [Redacted]

Tel: [Redacted]

Application Number: 123789

Application Type: Licence

Purpose: Temporary Work Camps

Location: Victoria Lake

Area ( hectares): 0

Prestige (metres): 0

Map Number: 97-23

Recomm: [Redacted]

RECOMMENDATION:

[ ] Approval  [ ] Refusal  [ ] Hold for further investigation

COMMENTS: [Redacted]

Signature: [Redacted]

Date: June 2009

Please return only the cover sheet with recommendations and any attachments you may have.

June 08 2009

[Redacted]
HISTORIC RESOURCES DIVISION
DEPT OF TOURISM CULTURE & RECREATION - ATTN MARTHA DRAKE
P.O. BOX 8700
ST JOHN'S NL A1B 4J6

This referral has been sent to you for your recommendation. Other referrals have been sent to the Department(s) and/or agencies on the attached schedule. YOU HAVE THIRTY (30) DAYS FROM THE DATE OF THIS REFERRAL TO PROVIDE YOUR RECOMMENDATION ON THIS APPLICATION.

Please be advised that the site on the attached map cannot be altered or relocated in any way without the prior approval of the Regional Lands Office.

APPLICATION FOR CROWN LANDS - REFERRAL

Applicant: 

Telephone: 

Application Number: 133793
Application Type: Licence
Purpose: Temporary Work Camps
Location: Victoria Lake
Area (hectares): 0
Frontage (metres): 0
Map Number:
Comments:

RECOMMENDATION:

☑ Approval       ☐ Refusal       ☐ Held for further investigation

COMMENTS:

_________________________________________________________

Martha Drake
Signature

729-2462
Phone No.

May 8, 2009
Date

Please Return Only The Cover Sheet With Recommendations And Any Attachments You May Have.
Mercer, Dave W

From: Sherry Dunsworth [mailto:sherrydunsworth@gmail.com]
Sent: Friday, March 04, 2011 8:49 AM
To: Mercer, Dave W
Subject: Re: Progress with new Crown Lands - Permit to Occupy application

Thank you Dave.

F.Y.I. My understanding is that Junior Colborne of CECON has already submitted a septic system design to Michelle Craig of Gov’t Services in St. John’s.

Regards, Sherry

On Fri, Mar 4, 2011 at 8:25 AM, Mercer, Dave W <davemercer@gov.nl.ca> wrote:

Sherry,

You will get something over the next couple of days about your septic design requirements.

Dave Mercer
Dept. of Environment & Conservation
Gander, NL
T: (709) 256-1407, F: (709) 256-1095

From: Sherry Dunsworth [mailto:sherrydunsworth@gmail.com]
Sent: Wednesday, March 02, 2011 8:42 PM
To: Mercer, Dave W
Subject: Progress with new Crown Lands - Permit to Occupy application

Hi Dave,

I am wondering about the progress of the new Crown Lands - Permit to Occupy application for Marathon Gold Corporation at our Victoria Lake camp site.

3/4/2011
Thank you, Sherry

---

Please note new company name and e-mail address:

Sherry Dunsworth, M.Sc., P.Geo.
V.P. Exploration
Marathon Gold Corp.

Sec 40(1)

(Private)
1-709-686-2874 (tel)
1-709-686-2817 (fax)

Sec 40(1)

@e-mail.com

"This email and any attached files are intended for the sole use of the primary and copied addressee(s) and may contain privileged and/or confidential information. Any distribution, use or copying by any means of this information is strictly prohibited. If you received this email in error, please delete it immediately and notify the sender."

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Please note new company name and e-mail address:

Sherry Dunsworth, M.Sc., P.Geo.
V.P. Exploration
Marathon Gold Corp.

Sec 40(1)

(Private)
1-709-686-2874 (tel)
1-709-686-2817 (fax)

Sec 40(1)

@e-mail.com

3/4/2011
Hi Hilary.

App# 141397 - the 1.6km buffer zone condition requiring a consultants report is no longer valid and can be removed from this application.

However,

App# 138262 - Marathon Gold Corporation (Temporary work camp at Victoria Lake, Licence to Occupy)

This application was cancelled April 16, 2012 for non-receipt of a Certificate of Approval for an on-site sewage disposal system. Even though your department does not release Certificates of Approval for commercial applications, because it was a condition of approval (as stated in the referral), we require clarification in writing (email is ok) that the GSC has approved this site for septic purposes. I have discussed this file with Trevor Mills who stated that a site inspection was completed by Craig Young and Karl Boone. (Craig Young has never been onsite, it was Karl and myself – see Marathon inspection attachment). When did the site inspection take place (May 16, 2011)? It is important to note that the client only had until March 7, 2012 to receive the approval from your department. Crown Lands can re-open this file and approve it if your department states that the client was approved prior to the cancellation date (March 7, 2012).

I have included the second attachment, "Marathon Gold Email to CL" already dealt with this issue in May 2012.

Bored with me on this explanation for Marathon Gold? :)

See Red for your answers to questions, I understand you are just coming into this position and likely don't have the history on the file, however, this was already discussed earlier this year with CL......
During my call to CL, I was requested by your office to email all the information I had in my file b.c. as stated, ... as you can see in the attached email, I forwarded all of this information (referral application, CoA, etc.) to CL on May 10, 2012 to Ms. Kattenbusch and Mr. Primmer, along with pics of the site inspection. I stated the site inspection was completed in mid-May 2011 and was told my pics of the inspection would verify it completed (after I explained I do not issue CoA's for commercial sites) and the issue resolved.

I trust this should finally put to rest the confusion of the missing Marathon Gold information and that their application should be approved immediately so when Ms. Dunsworth calls me to follow up next week, ...

If you require any further information on the file, site inspection, etc. please don't hesitate to contact me again... thanks for your help and clarification on the initial 141397 application.... and when you get a chance to rectify the Marathon Gold issue, please let me know so I have confirmation on the matter for my own files....

Cheers,
Paul

From: Coates, Hillary
Sent: Thursday, December 06, 2012 4:07 PM
To: McInnis, Paul; Hart, Darran; Hunt, Jody
Subject: Lands Applications

As per our conversation:

1/10/2013  Non-Responsive
Appl 138282 – Marathon Gold Corporation (Temporary work camp at Victoria Lake, Licence to Occupy) — This application was cancelled April 10, 2012 for non-receipt of a Certificate of Approval for an on-site sewage disposal system. Even though your department does not release Certificates of Approval for commercial applications, because it was a condition of approval (as stated in the referral), we require clarification in writing (email is ok) that the GSC has approved this site for septic purposes. I have discussed this file with Trevor Mills who stated that a site inspection was completed by Craig Young and Karl Boons. When did the site inspection take place? It is important to note that the client only had until March 7, 2012 to receive the approval from your department. Crown Lands can re-open this file and approve of it if your department states that the client was approved prior to the cancellation date (March 7, 2012).

Ordinarily these sorts of things would be taken care of by your colleagues Darren Hart or Jody Hunt, so I have also sent the email to their attention.

Thanks,

Hilary Costas
Lands Officer
Dept. of Environment & Conservation
Crown Lands Division, Gander, NL
Phone: (709) 256-1400
Fax: (709) 256-1664

1/10/2013
<table>
<thead>
<tr>
<th>Date &amp; Time</th>
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</thead>
<tbody>
<tr>
<td>May 4th, 2013</td>
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Michelle Cipiti, returned my call. She is waiting on stamped drawings from City Hall. She called by Colborne, with City, but he is out of the office today. Michelle just waiting on drawings to send out today.

**Sec 29 (1)(a)**

- **Design and Cost Review**
  - Inspected site & K. Personnel & members
  - Past suspected infestations by rocky celery worm, now controlled
  - Drains water away from system (watergate) & landscape
  - Work to be completed in about a week
- **System installed on per design**
  - System passed inspection
  - Signed off: City 09/30/13

**Summary**

- **Case Number**
  - Marathon Field

**Narrative**

- **File #**
  - Newfoundland & Labrador

**Concluding Report**

- **Administrative/Operational**
Hi Linda,

Please find attached most of the pertinent info we have on file... I have included some of the pictures I took of the system as well... Any questions, please let me know...

Thanks,
Paul

Newfoundland Labrador

Paul Melanson, Marine Env. Reg.
Environmental Protection Officer

5/10/2012
Lands Branch
Central Regional Lands Office

APR 19, 2013

MARATHON GOLD CORPORATION
C/O Sherry Dunswothy (V. P. Exploration)
330 Bay St.
Toronto ON
M5J 2S8

Dear Sir/Madam:

RE: APPLICATION NO: 138262
TYPE: Licence
PURPOSE: Temporary Work Camps
LOCATION: Victoria Lake
RENTAL FEE: $100.00 (plus HST)

A correction was necessary in the documents previously sent to you for signature. Your application has been approved for a Licence to Occupy for a term of 1 year(s).

Enclosed are duplicate draft licence documents that must be signed and dated by you in the spaces provided.

Both signed documents must be returned to this Department together with your annual rental of $100 and the document preparation fee of $200.00. Your cheque or money order should be made payable to the Newfoundland Exchequer Account. A pre-addressed return envelope is included for your convenience. These are legal documents and must not be defaced or altered in any way. Failure to return both documents and monies owed within ninety (90) days of the date on which you receive this letter will result in the cancellation of your application.

A copy of the Licence will be forwarded to you upon registration in the Registry of Crown Titles.

Please note that the land is not to be occupied until you receive a fully executed title document.

Should you require further information, please contact this office at the address listed.

Yours truly,

[Signature]

REGIONAL LANDS MANAGER

Enclosures

501 Fraser Mall, P.O. Box 2222, Gander, NL, A1V 2N9, Telephone (709) 256-1100, Facsimile (709) 256-1095
CONDITION(S)

SERVICE NL – GOVERNMENT SERVICE CENTRE

The Government Service Centre would have no objection to this proposal provided the following stipulations are adhered to:

Water and Sewer

1. Approved subject to the applicant submitting plans and receiving approval for the proposed water and sewerage systems. Systems in excess of 4546 litres must be in compliance with the Environmental Control Water and Sewage Regulations and the Guidelines for the Design, Construction and Operation of Water and Sewage Systems and require certified engineering drawings and specifications. Systems less than 4546 litres must be in accordance with the Sanitation Regulations and Standards of Acceptable Practice for On-Site Sewage Disposal System and prepared by an approved designer.

General

1. Any alteration of a natural water body work within 15 metres of a water body, or development within a protected water supply area will require prior approval by the Water Resources Division of the Department of Environment and Conservation. Alteration of a water body may include culvert installations, stream crossings, outfalls, infilling; or bridge, dam, and wharf construction.

2. 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.

3. Application must be made for Final Site Safety (Request for Approval of Plans Form) and Building Accessibility (Application for Building Accessibility Registration Form) review/approvals.

4. Development must not extend within 200 m of a scheduled salmon river without prior registration and release under the Environment Assessment Act, Department of Environment and Conservation, Environmental Assessment Division.

5. Upon closure of the operation, the site must be rehabilitated to the satisfaction of the Department. All materials, equipment, buildings and waste are to be removed from the site and disposed of in accordance with Part IV of the Environment Protection Act.

Waste

1. All waste material, generated during the construction and operation of the facility, shall be considered, prior to disposal, for reuse, repair or recycling.

2. Other waste material generated on-site is to be placed in spillable refuse containers and removed to an approved waste disposal site on a weekly basis, with the approval of the site owner/operator. Refuse containers shall be placed at all active areas for use by construction crews and employees.

3. Debris vehicles, scrap equipment and other debris are not to be stored on-site. Such material is to be removed to an approved waste disposal site or scrap yard on a regular basis, with the approval of the site owner/operator.

4. The site is to be kept neat and tidy at all times.

5. Any cut brush should be chipped/shredded, burned on-site or removed to an approved waste disposal site for burning with the approval of the Department of Natural Resources and/or the owner/operator of the waste disposal site.

6. Tires and used or waste oil are not to be used to aid in the burning of brush.
Gasoline and Associated Products

1. All drum based fuel storage facilities are to comply with the Provincial Environmental Guidelines For Drum-based Petroleum Products Storage and Operation. Approval is required from Government Service Centre prior to installation of a facility exceeding ten drums.

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 registration, by the Government Service Centre, prior to installation.

3. All fuel storage tank systems connected to a heating appliance of a capacity of 2,500 litres or less must comply with the Heating Oil Storage Tank System Regulations.

4. The storage, handling and disposal of used oil and lubricants must comply with the Used Oil Control Regulations, NLR 92/92.

5. Floor drains from service bays or other areas handling used or waste oils are to be routed through an oil vapor separator to remove oily waste before being discharged. Plans and specifications must be submitted for review and approval by Government Service Centre prior to installation.

6. All fuel storage and handling locations 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 absorbers and open-ended barrels for collection of cleanup debris, should be stored in an accessible location on-site. Personnel working on the project should be knowledgeable about response procedures. The applicant/proponent should consider developing a contingency plan specific to the proposed undertaking to enable a quick and effective response to a spill event.

7. Any spill or leak of gasoline or associated product is to be reported immediately to the Department of Government Services by calling the Canadian Coast Guard Environmental Emergency line at 772-2483 or 1-800-863-4689.

8. All spills or leaks of petroleum product must be remediated to the satisfaction of the Government Service Centre and the Department of Environment and Conservation.
Lands Branch
Central Regional Lands Office

MAR 6, 2013

MARATHON GOLD CORPORATION
C/O Sherry Dunsworth (V. P. Exploration)
330 Bay St.
Toronto ON
M5H 2B8

Dear Sir/Madam:

RE: APPLICATION NO: 138262
TYPE: Licence
PURPOSE: Temporary Work Camps
LOCATION: Victoria Lake
RENTAL FEE: $100.00 (plus HST)

Your application has been approved for a Licence to Occupy for a term of 1 year(s).

Enclosed are duplicate draft licence documents that must be signed and dated by you in the spaces provided.

Both signed documents must be returned to this Department together with your annual rental of $100.00 (plus HST) and the document preparation fee of $200.00. Your cheque or money order should be made payable to the Newfoundland Exchequer Account. A pre-addressed return envelope is included for your convenience. These are legal documents and must not be defaced or altered in any way. Failure to return both documents and monies owed within ninety (90) days of the date on which you receive this letter will result in the cancellation of your application.

A copy of the Licence will be forwarded to you upon registration in the Registry of Crown Titles.

Please note that the land is not to be occupied until you receive a fully executed title document.

Should you require further information, please contact this office at the address listed.

Yours truly,

REGIONAL LANDS MANAGER

Enclosures

Froster Mol, P.O. Box 2222, Gander, NL, A1V 2N9, Telephone (709) 256-1400, Facsimile (709) 256-1095
CONDITION(S)

SERVICE NL—GOVERNMENT SERVICE CENTRE

The Government Service Centre would have no objection to this proposal provided the following stipulations are adhered to:

Water and Sewer:

1. Approved subject to the applicant submitting plans and receiving approval for the proposed water and sewerage system. Systems in excess of 4546 litres must be in compliance with the Environmental Control Water and Sewage Regulations and the Guidelines for the Design, Construction and Operation of Water and Sewerage Systems and require certified engineering drawings and specifications. Systems less than 4546 litres must be in accordance with the Sewerage Regulations and Standards of Accepted Practice for On-Site Sewage Disposal System and prepared by an approved designer.

General:

1. Any alteration of a natural water body, work within 15 metres of a water body, or development within a protected water supply area will require prior approval by the Water Resources Division of the Department of Environment and Conservation. Alteration of a water body may include culvert installations, stream crossings, outfalls, infilling; or bridge, dam, and wharf construction.

2. 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.

3. Application must be made for First Light Safety (Request for Approval of Plans Form) and Building Accessibility (Application for Building Accessibility Registration Form) reviews/approvals.

4. Development must not extend within 200 m of a scheduled salmon river without prior registration and release under the Environment Assessment Act, Department of Environment and Conservation, Environmental Assessment Division.

5. Upon closure of the operation, the site must be rehabilitated to the satisfaction of the Department. All materials, equipment, buildings, and waste are to be removed from the site and disposed of in accordance with Part IV of the Environment Protection Act.

Waste:

1. All waste material, generated during the construction and operation of the facility, shall be considered, prior to disposal, for reuse, resale or recycling.

2. Other waste material generated on-site is to be placed in suitable refuse containers and removed to an approved waste disposal site on a weekly basis, with the approval of the site owner/operator. Refuse containers shall be placed at all active areas for use by construction crews and employees.

3. Debilitated vehicles, scrapped equipment and other debris are not to be stored on-site. Such material is to be removed to an approved waste disposal site or scrap yard on a regular basis, with the approval of the site owner/operator.

4. The site is to be kept neat and tidy at all times.

5. Any cut brush should be chipped/shredded, burned on-site or removed to an approved waste disposal site for burning with the approval of the Department of Natural Resources and/or the owner/operator of the waste disposal site.

6. Tires and used or waste oil is not to be used to aid in the burning of brush.
Gasoline and Associated Products

1. All drum based fuel storage facilities are to comply with the Provincial Environmental Guidelines For Drum-Based Petroleum Products Storage and Operation. Approval is required from Government Service Centre prior to installation of a facility exceeding ten drums.

2. All fuel storage tank systems 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 registration, by the Government Service Centre, prior to installation.

3. All fuel storage tank systems connected to a heating appliance of a capacity of 2,500 litres or less must comply with the Heating Oil Storage Tank System Regulations.

4. The storage, handling and disposal of used oil and lubricants must comply with the Used Oil Control Regulations, MLR 82/03.

5. Floor drains from service bays or other areas handling used or waste oils are to be routed through an oil water separator to remove oily waste before being discharged. Plans and specifications must be submitted for review and approval by Government Service Centre prior to installation.

6. At fuel storage and handling locations 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 cleanup debris, should be stored in an accessible location on-site. Personnel working on the project should be knowledgeable about response procedures. The applicant/proponent should consider developing a contingency plan specific to the proposed undertaking to enable a quick and effective response to a spill event.

7. Any spill or leak of gasoline or associated products is to be reported immediately to the Department of Government Services by calling the Canadian Coast Guard Environmental Emergency line at 772-2083 or 1-800-563-9089.

8. All spills or leaks of petroleum products must be remediated to the satisfaction of the Government Service Centre and the Department of Environment and Conservation.
Lands Branch  
Central Regional Lands Office  

APR. 10, 2012

MARATHON GOLD CORPORATION  
C/O Sherry Dunsworthy (V. P. Exploration)  
330 Bay St  
Toronto ON  
M5H 2S8

Dear Sir/Madam:

RE: APPLICATION NO.: 138262  
TYPE: Licence  
PURPOSE: Temporary Work Camp  
LOCATION: Victoria Lake

Your application has been cancelled in accordance with Section 10 of the Lands Act and/or Departmental Policy for the following reason(s):

The approval for your on site sewage disposal and/or water supply system has not been received by this office on or before March 7, 2012.

Should you require further information, please contact this office.

Yours truly,

[Signature]

LANDS OFFICER

cc: Government Service Centre/GFW
MARATHON GOLD CORPORATION  
C/O Sherry Dunsworth (V. F. Exploration)  
330 Bay St  
Toronto ON M5H 2S8

MAR 7, 2011

Dear Sir/Madam:

RE: APPLICATION NO.: 138262  
TYPE: Licence  
PURPOSE: Temporary Work Camp  
LOCATION: Victoria Lake

Your application for Crown land has been conditionally approved for a Licence for a term of 5 year(s). The annual rental fee of $100 (plus HST if applicable) and a fee of $200.00 will be required for the cost of preparing and registering the title documents. Please do not submit any monies until requested to do so.

Before processing of your application can be completed, it is your responsibility to have the land evaluated for the installation of an on-site sewage disposal and/or water supply system. This evaluation must be conducted by a registered designer and submitted to the Government Service Centre for final approval. You have to contact the Government Service Centre nearest you for a list of registered designers and any pertinent information required to have the land evaluated and approved.

This Department will not be responsible for any costs incurred for a sewage disposal and/or water supply system design should the site be determined unsuitable.

Your approval for an on-site sewage disposal and/or water supply system must be received by this Office one year from the date of this letter, or your application will be considered cancelled by you in accordance with Department Policy.

Should you require further information concerning title requirements or process, please contact the Regional Lands Office at the address listed.

Yours truly,

[Signature]

REGIONAL LANDS MANAGER

Attachment

cc: Government Service Centre/GFW
From: McInnis, Paul  
Sent: Friday, January 04, 2013 10:19 AM  
To: ‘Sherry Dunsworth’  
Cc: Coates, Hilary; Primmer, Rodger  
Subject: Marathon Gold  
Attachment: image001.jpg

Hi Ms. Dunsworth,

It seems I am always on the road when you call and missed your call again yesterday (Jan. 3, 2013).... I believe Karl Boone followed up on your behalf yesterday and spoke with Crown Lands again..... But this time I wanted to touch base with you personally to ensure you that Crown Lands should be able to rectify this situation fairly quickly considering the time table you have been dealing with....

I provided Crown Lands with two comprehensive emails (May 10, 2012 and Dec. 13, 2012) and attachments to verify proof that your system was inspected and approved as per the design submitted each time you called to inquire about the cancellation of your application.... Originally I was dealing with Mr. Primmer and Ms. Kattenbusch in May, but if you call, the last phone call and email I sent was to Hilary Coates on Dec. 13/2012 and provided her with the same information again.... Ms. Coates was new to the position so there may be some delay in letting you know since she only received the info. personally on the 13th..... I have cc'd Mr. Primmer and Ms. Coates so they can follow up with you and your concerns from this point on....

If you continue to have problems, please let me know and I will assist you where I can....

Regards,
Paul

Paul McInnis  
Environmental Protection Officer  
Service NL, Provincial Building  
Grand Falls-Windsor, NL  
Phone: 709-292-4347  
Fax: 709-292-4149

1/7/2013
NOTIFICATION OF ACCEPTANCE OF WATER USE LICENCE/PERMIT
[Water Withdrawal and Use from Bodies of Water (Valentine Lake Property)]


As a Licensee/Holder of Water Use Licence/Permit No. WUL-13-003, issued pursuant to the Water Resources Act, Marathon Gold Corporation (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 three maps 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 Environment and Conservation.

Signed, sealed, and delivered by Marathon Gold Corporation, in accordance with its rules and regulations in that behalf at ______, this ______ day of ______, 2013 in the presence of ______.

Witness

Per:

Signing Officer

Seal:
cc:  Dr. Abdel-Zaber Kamal Abdel-Razek, P.Eng. Manager
     Water Resources Management Division
     Department of Environment and Conservation
     PO Box 8700
     St. John's NL A1B 4J6

cc:  Jim Hinchey, Director
     Mineral Lands Division
     Department of Natural Resources
     PO Box 8700
     St. John's NL A1B 4J6

cc:  Calvin Payne
     Regional Lands Manager (W)
     Department of Environment and Conservation
     PO Box 2006, Norton Building
     Corner Brook NL A2H 6J8

cc:  Butch Vardy
     Regional Director
     Department of Service NL
     PO Box 2006
     Corner Brook NL A2H 6J8
Pursuant to the Water Resources Act, SNL 2002 cW-4-01

Date of Issuance: January 21, 2013

No: WUL-13-003

Licensee/Holden: Marathon Gold Corporation
357 Bay Street, Suite 800
Toronto ON M5H 2T7

Attention: Sherry Dunsworth

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

The Minister of Environment and Conservation (the "Minister") hereby grants a non-exclusive water right to Marathon Gold Corporation (the "Licensee/Holden") to withdraw water from bodies of water, as indicated in the three maps for exploration approval including those within the boundary of property (attached), and use it for the purpose of supplying water to the Licensee/Holden's mineral exploration project (Valentine Lake Property) in reference to the application received on December 5, 2012 and further information provided on December 31, 2012.

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 three maps for exploration approval form part and parcel of this Licence/Permit.

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

The Licensee/Holden shall complete and return the attached Notification of Acceptance of Water Use Licence/Permit (attached) to the Water Rights Section of the Department of Environment and Conservation within thirty (30) days of receipt of this Licence/Permit.

Failure to comply with the terms and conditions, reservations, exceptions, and provisions set out herein will render this Licence/Permit null and void, place the Licensee/Holden and/or its agents in violation of the Water Resources Act, and cause the Licensee/Holden to be responsible for any and all remedial measures which may be prescribed by the Department of Environment and Conservation.
GOVERNMENT OF
NEWFOUNDLAND AND LABRADOR
DEPARTMENT OF ENVIRONMENT AND CONSERVATION
APPENDIX A

TERMS AND CONDITIONS FOR WATER USE LICENCE/PERMIT

1. In consideration of the terms and conditions, reservations, exceptions, and provisions herein contained, the Minister hereby grants the Licensee/Holder a non-exclusive right to withdraw water from bodies of water, as indicated in the three maps for exploration approval including those within the boundary of property (attached), and use it for the purpose of supplying water to the Licensee/Holder’s mineral exploration project (Valentine Lake Property) in reference to the application received on December 5, 2012 and further information provided on December 31, 2012.

2. Ownership of water rights remains with the Crown and is not transferred. The Water Use Licence/Permit only provides permission for the Licensee/Holder to use water for the purpose indicated in this Licence/Permit.

3. 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 Licensee/Holder without obtaining prior written approval from the Minister.

4. The Licensee/Holder acknowledges and agrees that this Licence/Permit does not grant any interest in land.

5. This Licence/Permit shall expire on December 31, 2017 or earlier if suspended or cancelled by the Minister. The Licensee/Holder may apply for an extension at least ninety (90) days before the expiry of the initial term of this Licence/Permit.

6. The designated purpose of the water use is "Industrial/Mineral Exploration".

7. The estimated daily water withdrawal from the said bodies of water shall not exceed 2,000,000 litres, 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 Licensee/Holder shall at any time withdraw and use amounts of water in excess of the need for the Licensee/Holder’s mineral exploration activities, irrespective of the amount of water approved.

8. In case of drilling on the ice cover of the said bodies of water, the Licensee/Holder 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 log book. More frequent inspections are required when there are sudden temperature changes.

9. The Licensee/Holder 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 drilling activities area 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 the Department of Environment and Conservation must be informed if drilling 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 drilling activities must be removed from drilling activities and disposed at a site approved by the regional Government Service Centre of the Department of Service NL. The Departments of Environment and conservation and Service NL may require samples to be submitted for testing and analysis.

10. Water pumped or discharged from drilling activities, or any runoff or effluent directed out of the drilling 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.
TERMS AND CONDITIONS FOR WATER USE LICENCE/PERMIT

11. 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 Government Services. This site must not be within 100 metres of any body of water. The water in the system must be recycled.

12. The Licensee/Holder shall keep records for water withdrawals and use and other relevant information and complete and file a form following the format of Appendix B with the Water Rights Section of the Department of Environment and Conservation on or before March 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.

13. The Licensee/Holder shall not construct any systems/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.

14. The Licensee/Holder shall keep all systems/equipment and vehicles used for drilling in clean and good condition and repair, free of oil, or other harmful substances that could impair water quality of any body of water and shall notify the Minister immediately if any problem arises which may adversely affect public safety or other existing water users. Also, the Licensee/Holder shall restore all areas that may be affected by drilling 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.

15. 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.

16. 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.

17. 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 restaffing shall be brought on the ice at one time.

18. The Licensee/Holder and the Licensee/Holder’s contractor(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 Division and environmental monitors within 24 hours. This includes, but is not limited to, any spillage of fluid, 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 drilling activities.

19. The employees of the Department of Environment and Conservation, authorized by the Minister, may at all reasonable times during the term covered by this Licence/Permit enter into the mineral exploration activities area and the Licensee/Holder’s designated place of business to inspect the systems/equipment, 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.
20. The Licensee/Holder indemnifies and holds 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 the water rights granted under this Licence/Permit, systems/equipment in the mineral exploration activities areas, or any act or omission of the Licensee/Holder in the mineral exploration 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.

21. If the Licensee/Holder fails to perform, fulfill, or observe any of the terms and conditions, reservations, exceptions, and provisions of this Licence/Permit and/or Ministerial orders and guidelines, as determined by the Department of Environment and Conservation, the Minister may, after providing a ten (10) days notice by personal service or registered mail or facsimile to the Licensee/Holder at any time during the term created by this Licence/Permit, modify or cancel this Licence/Permit.

22. Should any provision of this Licence/Permit be unenforceable, it shall be considered separable 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.

23. This Licence/Permit is subject to the Water Resources Act 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.

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

25. 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 and facsimile of the Licensee/Holder is:

Marathon Gold Corporation
357 Bay Street, Suite 800
Toronto ON M5J 2T7
(709) 686-2317

The address and facsimile number of the Department of Environment and Conservation is:

Water Rights Section
Department of Environment and Conservation
PO Box 8700
St. John’s NL A1B 4J6
(709) 729-0320
Water Use Licence for Marathon Gold Corp. on the Valentine Lake Property, 20,000 L/day
**Schedule "A3"**

- *Gate*
  - **Exclusive Use**
  - **Non-Exclusive Use**

**Permission No.: 150214**

- **Gate existed January 12, 2017**

**Name:** Marathon Gold Corporation  
**Permission No.: 150214**  
**Location:** Valentine Lake  
**Map No.: 12A-06**  

**SCALE:** 1:30,000

*Boundaries and positions of features are approximate.*
Strowbridge, Kerry

From: Ledrew, Amanda
Sent: Wednesday, November 28, 2018 2:07 PM
To: Neville, Lisa
Subject: FW: REFERRAL: E190001 Marathon Gold Corp. – Valentine Lake Property

Please see email below

From: Ledrew, Amanda
Sent: Monday, November 26, 2018 2:24 PM
To: Brake, Coolene L. <cbrake@gov.nl.ca>
Subject: RE: REFERRAL: E190001 Marathon Gold Corp. – Valentine Lake Property

No concerns from Agriculture

Thanks Amanda

From: Brake, Coolene L. <cbrake@gov.nl.ca>
Sent: Friday, November 23, 2018 9:51 AM
To: Ledrew, Amanda <amandaledrew@gov.nl.ca>
Subject: FW: REFERRAL: E190001 Marathon Gold Corp. – Valentine Lake Property

FYR

Newfoundland
Labrador

www.gov.nl.ca
@FLR_GovNL

Coolene L. Brake, B.Tech
Manager (A)
Agriculture Land Section

Department of Fisheries and Land Resources
P.O. Box 2006
Corner Brook, NL. Canada A2H 6J8

709.637.2084
709.637.2586
cbrake@gov.nl.ca

From: Miller, Kirsten
Sent: Wednesday, November 21, 2018 3:52 PM
To: Poole, Dave C; Wight, Corey; Fenske, Jane; Soper, Leah; naturalareasreferrals; Brake, Coolene L.; kawaja, jonathan; Ward, Brandon; Morrissey, Damien
Cc: Morgan, Tara; Delaney, Dave; Bannister, Jeff; Lush, William D.; Barney, Wayne; Mavin, Tara
Subject: FW: REFERRAL: E190001 Marathon Gold Corp. – Valentine Lake Property

Please send comments by November 28, 2018

From: Snow, Matthew
Sent: Wednesday, November 21, 2018 1:02 PM
To: Drake, Martha <mdrake@gov.nl.ca>; Mercer, Delphina <dhmercer@gov.nl.ca>; Connolly, Krista <KristaConnolly@gov.nl.ca>; Miller, Kirsten <KirstenMiller@gov.nl.ca>; Carter, Paul A. <pcarter@gov.nl.ca>; Mostofi, Shabnam <ShabnamMostofi@gov.nl.ca>; Angelopoulos, John <johnangelopoulos@gov.nl.ca>; Hefford, Brad <BradHefford@gov.nl.ca>; Lynch, Wayne <WayneLynch@gov.nl.ca>
REFERRAL: E190001 Marathon Gold Corp. – Valentine Lake Property

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

File E190001

Exploration Approval (Prospecting Geochemical Survey, Ground Geophysics 200 DDH, 40 Trenches, Fuel Storage) for Marathon Gold Corp. on the Valentine Lake Property, NTS 12A/06 12A/07 Licences 010899M, 010943M 013809M, 013810M, 017230M 017231, 018687M, 018688M 016740M, 019443M, 019444M 019628M, 020482M, 022477M

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 (.pdf files) is confidential; please take the necessary steps to ensure the confidentiality of this information.

Your comments/licence, issuance 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 or comments. If you require additional time to respond please advise with a brief email message as soon as possible.

Matthew Snow
Mineral Exploration Site Inspector
Mineral Lands Division
NL Department of Natural Resources
telephone (709) 729-5534, cell (709) 649-0970
matthewsnow@gov.nl.ca
P.O. Box 8700, 50 Elizabeth Avenue, St. John's A1B 4J7
Attached is a draft letter to be sent to Mr. Mitchell.

Thanks,

Rodger

Hi Rodger

herb

Hi Herb,

We will write the owner of the newly discovered cabin and provide a timeline to apply. Most of the other 9 applications are currently Held at the request of Mines. They requested an opportunity to make additional comments. This request was received in April of 2018. One of the applications was approved and we have received a survey and approval for a septic design. This application is currently Held also.

I am proposing to respond to Mr. Walford of Marathon advising we have made contact with the owner of the 10th cabin and are providing an opportunity to submit an application along with supporting documentation in accordance with our policy on occupants of the former Abitibi Consolidated lands as we have done for the others in the area.

Tara, do you agree with proceeding in this manner?

Rodger

Sec 30 (1)(a)

Sec 40(1)
Hi Rodger

We have made contact with the cabin owner and he advised he had permission from Abitibi to have the cabin there. We advised he could apply for title and he indicated he was going to locate his documentation and send it to us. We haven't received anything to date. This was about 3 weeks ago now.

Rodger

From: Phil Walford [mailto:pwalford@marathon-gold.com]
Sent: Friday, November 16, 2018 2:41 PM
To: Primmer, Rodger
Cc: Tauna M. Staniland; Edwards, Herb
Subject: FW: Marathon - Letter to Crown Lands

Dear Mr. Primmer,

I know that you are a busy person. I would like to draw to your attention the issue of the status of [blank] cabin. We are planning our 2019 program that is focused on completing a Preliminary Feasibility Study by the end of the 3rd quarter of 2019. This study is being built on the successful PEA announced October 30, 2019 that demonstrates a large and robust mining operation is highly likely. The map provided is still current and clearly shows that the cabin is very close to the planned infrastructure. The location of the infrastructure is tentative and can easily shift with the results of geotechnical testing that we will commence in 2019 but the amount of shifting is limited by topography. There are a variety of testing methods that may have to be employed to determine the overburden and rock characteristics for civil engineering involved in foundation work and other infrastructure. The area around the [blank] cabin has a high likelihood of being tested so it is important for Marathon Gold to know the status of this cabin as we make our plans for 2019. If the cabin is not legal, it would be preferable to have it removed before we commence our testing.
Regards,
Phillip

Phillip C. Walford, P. Geo.
President and CEO
Marathon Gold Corporation
10 King Street East, Suite 501
Toronto, Ontario, M5C 1C3
Tel: +1.416.987.0711
Cel: +1.416.861.1925
Fax: +1.416.861.1925

From: Phil Walford
Sent: Thursday, October 18, 2018 1:39 PM
To: rprimer@gov.nl.ca
Cc: herbedwards@gov.nl.ca; tstaniland@stewartmckelvey.com
Subject: Marathon - Letter to Crown Lands

Dear Mr. Primmer,
The attached letter expresses an issue that needs to be addressed as we move our project forward.
The project continues to grow in size however the usable land we have for the project is limited.
The cabin referenced is where infrastructure must go.

Sincerely,
Phillip

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President and CEO
Marathon Gold Corp.
10 King St. East, Suite 501
Toronto, Ontario M5C 1C3
Tel: 416.987.0711
Mob: +1.416.861.1925
Fax: 416.861.1925
November 27, 2018

Dear [redacted]

It has come to our attention that you have two (2) cabins located on Crown Lands which were a part of the lands the Crown repatriated from Abitibi Consolidated Ltd. in December of 2008. Our records indicate one cabin is in the Victoria Lake area and one is in the Wilding Lake area.

You are required to submit a Crown Lands application for each site within 30 days of the date of this letter to determine if your occupation of these lands can be accommodated and legalized.

Attached to each application should be a copy of the land title you held from Abitibi Consolidated Ltd. In the absence of the land title or permit, a copy of any other documentation you received from the company for the occupation of the land (e.g. copies of letters, invoices, etc.) can be considered. In the absence of any of the aforementioned documentation, the enclosed affidavit can be completed and submitted with each application. Please note that your signature on the affidavit must be witnessed by a barrister. No application processing fees are required to be submitted with these applications.

Your failure to submit applications within the required time frame will result in the initiation of legal action for the unauthorized occupation of Crown Lands.

Sincerely,

RODGER PRIMMER
Regional Lands Manager

RP/jh
No comment.

Brandon Ward, M.Env.Sc | Policy, Planning, and Research Analyst
SUSTAINABLE FISHERIES AND OCEANS POLICY
DEPARTMENT OF FISHERIES AND LAND RESOURCES
GOVERNMENT OF NEWFOUNDLAND AND LABRADOR
ST. JOHN'S, NL
TELEPHONE: 709-729-3735
EMAIL: brandonward@gov.nl.ca

From: Miller, Kirsten <KirstenMiller@gov.nl.ca>
Sent: Wednesday, November 21, 2018 3:52 PM
To: Poole, Dave C <DavePoole@gov.nl.ca>; Wight, Corey <coreywight@gov.nl.ca>; Fenske, Jana <janaFenske@gov.nl.ca>; Soper, Leah <LSoper@gov.nl.ca>; naturalareasreferrals <naturalareasreferrals@gov.nl.ca>; Brake, Cooleen L. <cbrake@gov.nl.ca>; kawaja, jonathan <jonathankawaja@gov.nl.ca>; Ward, Brandon <BrandonWard@gov.nl.ca>; Morrissey, Damien <dmorrissey@gov.nl.ca>
Cc: Morgan, Tara <taramorgan@gov.nl.ca>; Delaney, Dave <ddelaney@gov.nl.ca>; Bannister, Jeff <JeffBannister@gov.nl.ca>; Lush, William D. <WilliamLush@gov.nl.ca>; Barney, Wayne <waynebarney@gov.nl.ca>
Mavin, Tara <TaraMavin@gov.nl.ca>
Subject: FW: REFERRAL: E190001 Marathon Gold Corp. – Valentine Lake Property

Please send comments by November 28, 2018
200 DDH, 40 Trenches, Fuel Storage
for Marathon Gold Corp. on the
Valentine Lake Property, NTS 12A/06
12A/07 Licences 010899M, 010943M
013809M, 013810M, 017230M
017231, 018687M, 018688M
016740M, 019443M, 019444M
019628M, 020482M, 022477M

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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 or comments. If you require additional time to respond please advise with a brief email message as soon as possible.

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
No concerns from Agriculture

From: Miller, Kirsten  
Sent: Wednesday, November 21, 2018 3:52 PM  
To: Poole, Dave C; Wight, Corey; Fenske, Jana; Soper, Leah; naturalareasreferrals; Brake, Coolene L.; kawaja, jonathan; Ward, Brandon; Morrissey, Damien 
Cc: Morgan, Tara; Delaney, Dave; Bannister, Jeff; Lush, William D.; Barney, Wayne; Mavin, Tara 
Subject: FW: REFERRAL: E190001 Marathon Gold Corp. – Valentine Lake Property

Please send comments by November 28, 2018

From: Snow, Matthew  
Sent: Wednesday, November 21, 2018 1:02 PM  
To: Drake, Martha <mdrake@gov.nl.ca>; Mercer, Delphina <dhmercer@gov.nl.ca>; Connolly, Krista <KristaConnolly@gov.nl.ca>; Miller, Kirsten <KirstenMiller@gov.nl.ca>; Carter, Paul A. <pcarter@gov.nl.ca>; Mostofi, Shabnam <ShabnamMostofi@gov.nl.ca>; Angelopoulos, John <johnangelopoulos@gov.nl.ca>; Hefford, Brad <BradHefford@gov.nl.ca>; Lynch, Wayne <WayneLynch@gov.nl.ca> 
Cc: Sheppard, Kevin <KevinSheppard@gov.nl.ca> 
Subject: REFERRAL: E190001 Marathon Gold Corp. – Valentine Lake Property

REFERRAL: E190001 Marathon Gold Corp. – Valentine Lake Property

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

File E190001.

Exploration Approval (Prospecting 
Geochemical Survey, Ground Geophysics 
200 DDH, 40 Trenches, Fuel Storage) for Marathon Gold Corp. on the 
Valentine Lake Property, NTS 12A/06 
12A/07 Licences 010899M, 010943M  
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telephone (709) 729-5634, cell (709) 649-0970
mattewsnow@gov.nl.ca
P.O. Box 8700, 50 Elizabeth Avenue, St. John’s A1B 4J7
FYI

From: House, Len  
Sent: Thursday, November 22, 2018 2:20 PM  
To: kawaja, jonathan  
Subject: RE: REFERRAL: E190001 Marathon Gold Corp. – Valentine Lake Property

Hi Jonathan:

I just reviewed the application and maps you forwarded me for the Marathon Gold Group’s proposed exploration work in the Valentine Lake area. The proposed site is not in close proximity to any existing or planned aquaculture activities. It will have no impact on the expansion of the aquaculture industry in the province.

Let me know if you require anything further on this file.

Leonard

---

From: kawaja, jonathan  
Sent: Thursday, November 22, 2018 2:04 PM  
To: House, Len <lenhouse@gov.nl.ca>  
Subject: FW: REFERRAL: E190001 Marathon Gold Corp. – Valentine Lake Property

Hi Len,

Much appreciated if you can review this referral for potential aquaculture concerns or conflicts.
From: Miller, Kirsten
Sent: Wednesday, November 21, 2018 3:52 PM
To: Poole, Dave C; Wight, Corey; Fenske, Jana; Soper, Leah; naturalareasreferrals; Brake, Coolene L.; kawaja, jonathan; Ward, Brandon; Morrissey, Damien
Cc: Morgan, Tara; Delaney, Dave; Bannister, Jeff; Lush, William D.; Barney, Wayne; Mavin, Tara
Subject: FW: REFERRAL: E190001 Marathon Gold Corp. – Valentine Lake Property

Please send comments by November 28, 2018

From: Snow, Matthew
Sent: Wednesday, November 21, 2018 1:02 PM
To: Drake, Martha <mdrake@gov.nl.ca>; Mercer, Delphina <dhmercer@gov.nl.ca>; Connoily, Krista <KristaConnoily@gov.nl.ca>; Miller, Kirsten <KirstenMiller@gov.nl.ca>; Carter, Paul A. <pcarter@gov.nl.ca>; Mostofi, Shabnam <ShabnamMostofi@gov.nl.ca>; Angelopoulos, John <johnangelopoulos@gov.nl.ca>; Hefford, Brad <BradHefford@gov.nl.ca>; Lynch, Wayne <WayneLynch@gov.nl.ca>
Cc: Sheppard, Kevin <KevinSheppard@gov.nl.ca>
Subject: REFERRAL: E190001 Marathon Gold Corp. – Valentine Lake Property

REFERRAL: E190001 Marathon Gold Corp. – Valentine Lake Property

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File E190001

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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, 59 Elizabeth Avenue, St. John’s A1B 4J7
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 they may wish to contact the Central (256-1400) and Western (637-3291) Crown Lands Regional Offices for positional information on these titles.

Thanks,

Damien

---

From: Miller, Kirsten
Sent: Wednesday, November 21, 2018 3:52 PM
To: Poole, Dave C <DavePoole@gov.nl.ca>; Wight, Corey <coreywight@gov.nl.ca>; Fenske, Jana <janafenske@gov.nl.ca>; Soper, Leah <LSoper@gov.nl.ca>; naturalareasreferrals <naturalareasreferrals@gov.nl.ca>; Brake, Coole H. ccbreake@gov.nl.ca>; kawaja, Jonathan <jonathankawaja@gov.nl.ca>; Ward, Brandon <BrandonWard@gov.nl.ca>; Morrissey, Damien <dmorrissey@gov.nl.ca>
Cc: Morgan, Tara <taramorgan@gov.nl.ca>; Delaney, Dave <ddelaney@gov.nl.ca>; Bannister, Jeff <JeffBannister@gov.nl.ca>; Lush, William D. <WilliamLush@gov.nl.ca>; Barney, Wayne <waynebarney@gov.nl.ca>; Mavin, Tara <TaraMavin@gov.nl.ca>
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Please send comments by November 28, 2018

From: Snow, Matthew
Sent: Wednesday, November 21, 2018 1:02 PM
To: Drake, Martha <mdrake@gov.nl.ca>; Mercer, Delphina <dhmercer@gov.nl.ca>; Connolly, Krista <KristaConnolly@gov.nl.ca>; Miller, Kirsten <KirstenMiller@gov.nl.ca>; Carter, Paul A. <pcarter@gov.nl.ca>; Mostofi, Shabnam <ShabnamMostofi@gov.nl.ca>; Angelopoulos, John <johangelopoulos@gov.nl.ca>; Hefford, Brad <BradHefford@gov.nl.ca>; Lynch, Wayne <WayneLynch@gov.nl.ca>
Cc: Sheppard, Kevin <KevinSheppard@gov.nl.ca>
Subject: REFERRAL: E190001 Marathon Gold Corp. – Valentine Lake Property
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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
natural areas program has no concerns with this application.

tina
200 DDH, 40 Trenches, Fuel Storage) for Marathon Gold Corp. on the Valentine Lake Property, NTS 12A/06 12A/07 Licences 010899M, 010943M 013809M, 013810M, 017230M 017231, 018687M, 018688M 016740M, 019443M, 019444M 019628M, 020482M, 022477M

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Matthew Snow
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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
REFERRAL: E190001 Marathon Gold Corp. - Valentine Lake Property

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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
Morning,

I left a message for Sherry Dunsworth of Marathon Gold to call me asap. I have performed a check through FORST and they have not reported any harvesting under their 2016/17 and 2018 permits. I am trying to get Jamie to overlay their exploration permit maps with land base layers to determine where exactly those boundaries would intersect access roads.

Once she returns my call I will update you accordingly.

Chad
Hey,

We have made contact with the cabin owner and he advised he had permission from Abitibi to have the cabin there. We advised he could apply for title and he indicated he was going to locate his documentation and send it to us. We haven’t received anything to date. This was about 3 weeks ago now. Any suggestions on what we should advise Marathon at this point? Should we advise we are working with the applicant and will be accepting an application from him if he meets our policy requirements concerning occupation on former Abitibi Lands?

Rodger

---

From: Phil Walford [mailto:pwalford@marathon-gold.com]
Sent: Friday, November 16, 2018 2:41 PM
To: Primmer, Rodger
Cc: Tauna M. Staniland; Edwards, Herb
Subject: FW: Marathon - Letter to Crown Lands

Dear Mr. Primmer,

I know that you are a busy person. I would like to draw to your attention the issue of the status of [redacted] cabin. We are planning our 2019 program that is focused on completing a Preliminary Feasibility Study by the end of the 3rd quarter of 2019. This study is being built on the successful PEA announced October 30, 2019 that demonstrates a large and robust mining operation is highly likely. The map provided is still current and clearly shows that the cabin is very close to the planned infrastructure. The location of the infrastructure is tentative and can easily shift with the results of geotechnical testing that we will commence in 2019 but the amount of shifting is limited by topography. There are a variety of testing methods that may have to be employed to determine the overburden and rock characteristics for civil engineering involved in foundation work and other infrastructure. The area around the [redacted] cabin has a high likelihood of being tested so it is important for Marathon Gold to know the status of this cabin as we make our plans for 2019. If the cabin is not legal, it would be preferable to have it removed before we commence our testing.

Regards,
Phillip

Phillip C. Walford, P.Geo.
President and CEO
From: Phil Walford  
Sent: Thursday, October 18, 2018 1:39 PM  
To: rprimmer@gov.nl.ca  
Cc: herbedwards@gov.nl.ca; tstaniland@stewartmckelvey.com  
Subject: Marathon - Letter to Crown Lands

Dear Mr. Primmer,
The attached letter expresses an issue that needs to be addressed as we move our project forward. The project continues to grow in size however the usable land we have for the project is limited. The cabin referenced is where infrastructure must go.

Sincerely,
Phillip

Phillip C. Walford, P.Geo.
President and CEO
Marathon Gold Corp.
10 King St. East, Suite 501
Toronto, Ontario M5C 1C3
Tel: 416.987.0711
Mob: [Redacted]
Fax: 416.861.1925
Sorry,Forgot to attach the generic Commercial Permit Conditions
These are the permits that were issued to this company from 2010-2018. Taken from the Forst System.

-----Original Message-----
From: SpringdaleNatRes@gov.nl.ca
Sent: Tuesday, November 06, 2018 5:41 PM
To: Clarke, Rick
Subject: Scanned image from Dept Natural Resources 11/06/2018 13:10

Scanned from MFP07413412
Date:11/06/2018 13:10
Pages:8
Resolution:200x200 DPI
Hi Rodger

Thank you. I can help you draft a letter if necessary.

herb
From: Primmer, Rodger
Sent: Thursday, October 25, 2018 2:48 PM
To: Morgan, Tara <taramorgan@gov.nl.ca>
Cc: Edwards, Herb <herbedwards@gov.nl.ca>
Subject: FW: Marathon - Letter to Crown Lands

Hi,

Please see attached.

Rodger

From: Phil Walford [mailto:pwalford@marathon-gold.com]
Sent: Thursday, October 18, 2018 3:09 PM
To: Primmer, Rodger
Cc: Edwards, Herb; tstaniland@stewartmckelvey.com
Subject: Marathon - Letter to Crown Lands

Dear Mr. Primmer,
The attached letter expresses an issue that needs to be addressed as we move our project forward. The project continues to grow in size however the usable land we have for the project is limited. The cabin referenced is where infrastructure must go.
Sincerely,
Phillip

Phillip C. Walford, P.Geo.
President and CEO
Marathon Gold Corp.
10 King St. East, Suite 501
Toronto, Ontario M5C 1C3
Tel: 416.987.0711
Mob: [REDACTED]
Fax: 416.861.1925
Hi, See below FYI.

Rodger

---

From: Primmer, Rodger  
Sent: Tuesday, October 23, 2018 10:47 AM  
To: 'Phil Walford'  
Cc: Edwards, Herb; tstaniland@stewartmckelvey.com  
Subject: RE: Marathon - Letter to Crown Lands

Dear Mr. Walford:

Thank you for your correspondence of October 18, 2018. An initial review of our records indicates we have not received an application from an for Crown title to a cabin lot in the subject area identified. We will commence an investigation to determine the status of this occupation and provide an update in due course.

Sincerely,

Rodger Primmer

---

Rodger Primmer  
Regional Lands Manager  
Department of Fisheries and Land Resources  
Crown Lands Administration Division  
Government of Newfoundland & Labrador  
P.O. Box 2222, Gander, NL Canada A1V 2N9  
709-256-1235 (T) | rprimmer@gov.nl.ca

---

From: Phil Walford [mailto:pwalford@marathon-gold.com]  
Sent: Thursday, October 18, 2018 3:09 PM  
To: Primmer, Rodger  
Cc: Edwards, Herb; tstaniland@stewartmckelvey.com  
Subject: Marathon - Letter to Crown Lands

Dear Mr. Primmer,
The attached letter expresses an issue that needs to be addressed as we move our project forward. The project continues to grow in size however the usable land we have for the project is limited. The cabin referenced is where infrastructure must go.

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Marathon Gold Corp.
10 King St. East, Suite 501
Toronto, Ontario M5C 1C3
Tel: 416.987.0711
Mob: [redacted]
Fax: 416.861.1925
FYI.

From: Edwards, Herb
Sent: Friday, October 19, 2018 11:48 AM
To: Primmer, Rodger
Subject: Marathon - Valentine Lake

Hi Rodger

sec 30 (1)(a)

herb

sec 30 (1)(a)
FYI.

Some questions below which will need answering.

Rodger

Hi Rodger

The latest from Marathon.

herb

Hi Herb,

I hope you are well! I am just following up on my below email. Have you had a chance to consider? If so, could we schedule a call for next week to discuss?

Thank you,

Tauna
Thank you again for your below email, which was very helpful. After further review and discussion with Marathon we have some follow up questions for you as follows:

1. Approved Cabin in blast zone ("Blast Zone Cabin"). Thank you for your clarification that the Blast Zone Cabin was previously approved by Crown Lands Administration Division ("CLAD") and that the applicant has now submitted all materials required of him. Given the reality regarding the location of this land, we would like to understand if CLAD has any ability to put restrictions or conditions on the grant and, if so, consider what limitations may be appropriate. I note for example that in prior discussions with Rodger Primmer, Marathon had understood that at minimum there would need to be some acknowledgement by the applicant of the location of the Blast Zone Cabin in the blast zone and a waiver of liability related to the Cabin’s proximity to the operations. Similarly given that this Blast Zone Cabin can’t co-exist with the project, should the grant contain a specific reference to the Crown’s right to expropriate under the Minerals Act at the appraised value. This would be helpful both from the perspective of keeping the applicant from investing further in the cabin property in the interim and also alerting him to the fact that his ability to hold up the project may be limited. Additionally, Marathon would appreciate receiving a notice if/when a Crown grant is issued to the applicant.

2. Quinn Lake Applications. Thank you for your confirmation that the Quinn Lake Applications are currently on hold. As set out in my prior email, we confirm that these applications are located in target areas that are highly likely needed for mining infrastructure, and it is anticipated that when Marathon converts to a Mining Lease it would be seeking a Surface Lease over these areas which are all currently Crown Land. I can confirm that Marathon is planning to complete a study regarding road placement in the area and will also be completing exploration work over the next few seasons, Marathon will provide details of this work as it is available. In the interim, please let us know if there is any anticipated change in the status of the applications.

3. Abitibi Ledger and Cabin Policy. It is good news that the Abitibi Cabin ledger has been located. Marathon would very much appreciate receiving information on any other Abitibi permits over the Marathon license areas. Please let me know if there is an anticipated timeline for a review of the ledger by CLAD. Further to my last email, I am also hoping to get a copy of the Government’s policy on the Abitibi cabins. Information from the ledger and a copy of the policy will help Marathon understand the risk it faces from potential applications and enable it to explain those risks to its other stakeholders as needed. Please let me know if this is possible.

Related to the Government’s policy on the Abitibi cabins, we are wondering if there is any review of the policy underway within the government given the passage of time since the 2009 expropriation. While we haven’t seen the Cabin policy and while we understand the need to protect cabin owners who have had continuous use and occupation of cabins prior to Abitibi’s involvement, it seems to us that there should be some sort of balance against the risk and uncertainty the policy poses for those undertaking major projects at great cost and risk. As an example, could there be a date on which people need to convert or lose their rights under the policy or should the policy be revisited with respect to the automatic grants of lands (vs. permits or licences to occupy – which better reflect the yearly permits that Abitibi was granting). I know in Marathon’s circumstances there appear to be a number of old cabins that were unused and only fixed up after the expropriation date (once Marathon improved the roads). It is difficult to assess the policy without having seen it; however, we would hope that it could balance the all of rights involved and ensure that it reflects the passage of time since the expropriation.

Please let me know when you have had a chance to consider the above and then perhaps we can have a call to discuss.

Thank you,
Tauna
From: Edwards, Herb [mailto:herbedwards@gov.nl.ca]
Sent: Wednesday, May 16, 2018 10:43 AM
To: Tauna M. Staniland <tstaniland@stewartmckelvey.com>
Subject: Marathon Gold - Valentine Lake

Hi Tauna

Thank you for your call last week in follow-up to earlier e-mails.

Your March 22, 2018 e-mail did request copies of all applications for surface rights. The Crown Lands Administration Division [CLAD] does not provide copies of applications submitted by the general public, to a third party without the applicant’s consent since there is personal information provided in the applications. Your client may be able to access the applications through an ATIPP request. As you will recall, at our meeting on April 5, 2018, the CLAD process and the requirements which must be met by applicants was generally explained.

I can advise, however, that there are currently 9 applications at CLAD for lands in the general area of interest to your client. Of the 9 applications: 1 application was filed in 2011, 3 in 2012, 1 in 2014 and 4 in 2017. 8 applications were for the purpose of “Cottage” and one application describes its purpose as “Hunting/Fishing Cabin”. 7 of these applications are for lands at or near “Quinn Lake” with one for lands at “Rogerson Roebucks Road”. All applicants relate their applications back to previous permits issued by Abitibi.

One application has been approved, that application is for lands off “Valentine Lake Road”. The applicant was advised on September 12, 2017 that his application was approved and would be finalized once a survey was provided to CLAD and a sewage design/water supply system. The applicant was given one year [as is typical] to file these with CLAD. A survey has been provided and I am advised the approval for a sewage design/water supply system has also been received by CLAD.

The other 8 are being held. CLAD will hold these 8 for further review and discussion until such time as the Province makes a decision on whether these applications will be approved and titles issued.

This week CLAD received another application for lands approximately 6 km northeast of Quinn Lake. CLAD is unsure if this site will be of concern to your client.

I am advised the ledger is missing but CLAD had scanned the book while it was in its possession. The ledger [a huge volume] was returned by CLAD to the Department of Natural Resources. CLAD understands that Department has a scanned version of the ledger as well. CLAD is currently unaware of any other cabins in the area whose owners held permits from Abitibi Consolidated, however, it acknowledges that others may come forward. CLAD will review any additional sources of information which may become available and which may help identify others who held Abitibi Permits for cabins in the area. I will ask CLAD if it can review the scanned version of the ledger to see if it identifies any other permits in the area of interest to your client. If there are others identified I will let you know.

I trust this is of some help and thank you again.

herb
Hi,

We will need to provide Herb some info. on this, particularly concerning the policy questions, so he can respond to Ms. Staniland.

Thanks,

Rodger

---

Hi Rodger

Here is an e-mail I received yesterday from solicitor, Tauna Staniland on behalf of Marathon.

herb

Hi Herb,

Thank you again for your below email, which was very helpful. After further review and discussion with Marathon we have some follow up questions for you as follows:

1. **Approved Cabin in blast zone ("Blast Zone Cabin")**. Thank you for your clarification that the Blast Zone Cabin was previously approved by Crown Lands Administration Division ("CLAD") and that the applicant has now submitted all materials required of him. Given the reality regarding the location of this land, we would like to understand if CLAD has any ability to put restrictions or conditions on the grant and, if so, consider what limitations may be appropriate. I note for example that in prior discussions with Rodger Primmer, Marathon had understood that at minimum there would need to be some acknowledgement by the applicant of the location of the Blast Zone Cabin in the blast zone and a waiver of liability related to the Cabin's proximity to the operations. Similarly given that this Blast Zone Cabin can't co-exist with the project, should the grant contain a specific reference to the Crown's right to expropriate under the Minerals Act at the appraised value. This would be helpful both from the perspective of keeping the applicant from investing further in the cabin property in the interim and also alerting him to the fact that his ability to hold up the project may be limited.
Additionally, Marathon would appreciate receiving a notice if/when a Crown grant is issued to the applicant.

2. Quinn Lake Applications. Thank you for your confirmation that the Quinn Lake Applications are currently on hold. As set out in my prior email, we confirm that these applications are located in target areas that are highly likely needed for mining infrastructure, and it is anticipated that when Marathon converts to a Mining Lease it would be seeking a Surface Lease over these areas which are all currently Crown Land. I can confirm that Marathon is planning to complete a study regarding road placement in the area and will also be completing exploration work over the next few seasons, Marathon will provide details of this work as it is available. In the interim, please let us know if there is any anticipated change in the status of the applications.

3. Abitibi Ledger and Cabin Policy. It is good news that the Abitibi Cabin ledger has been located. Marathon would very much appreciate receiving information on any other Abitibi permits over the Marathon license areas. Please let me know if there is an anticipated timeline for a review of the ledger by CLAD. Further to my last email, I am also hoping to get a copy of the Government’s policy on the Abitibi cabins. Information from the ledger and a copy of the policy will help Marathon understand the risk it faces from potential applications and enable it to explain those risks to its other stakeholders as needed. Please let me know if this is possible.

Related to the Government’s policy on the Abitibi cabins, we are wondering if there is any review of the policy underway within the government given the passage of time since the 2009 expropriation. While we haven’t seen the Cabin policy and while we understand the need to protect cabin owners who have had continuous use and occupation of cabins prior to Abitibi’s involvement, it seems to us that there should be some sort of balance against the risk and uncertainty the policy poses for those undertaking major projects at great cost and risk. As an example, could there be a date on which people need to convert or lose their rights under the policy or should the policy be revisited with respect to the automatic grants of lands (vs. permits or licences to occupy – which better reflect the yearly permits that Abitibi was granting). I know in Marathon’s circumstances there appear to be a number of old cabins that were unused and only fixed up after the expropriation date (once Marathon improved the roads). It is difficult to assess the policy without having seen it; however, we would hope that it could balance the all of rights involved and ensure that it reflects the passage of time since the expropriation.

Please let me know when you have had a chance to consider the above and then perhaps we can have a call to discuss.

Thank you,
Tauna
Thank you for your call last week in follow-up to earlier e-mails.

Your March 22, 2018 e-mail did request copies of all applications for surface rights. The Crown Lands Administration Division [CLAD] does not provide copies of applications submitted by the general public, to a third party without the applicant’s consent since there is personal information provided in the applications. Your client may be able to access the applications through an ATIPP request. As you will recall, at our meeting on April 5, 2018, the CLAD process and the requirements which must be met by applicants was generally explained.

I can advise, however, that there are currently 9 applications at CLAD for lands in the general area of interest to your client. Of the 9 applications: 1 application was filed in 2011, 3 in 2012, 1 in 2014 and 4 in 2017. 8 applications were for the purpose of “Cottage” and one application describes its purpose as “Hunting/Fishing Cabin”. 7 of these applications are for lands at or near “Quinn Lake” with one for lands at “Rogerson Roebucks Road”. All applicants relate their applications back to previous permits issued by Abitibi.

One application has been approved, that application is for lands off “Valentine Lake Road”. The applicant was advised on September 12, 2017 that his application was approved and would be finalized once a survey was provided to CLAD and a sewage design/water supply system. The applicant was given one year [as is typical] to file these with CLAD. A survey has been provided and I am advised the approval for a sewage design/water supply system has also been received by CLAD.

The other 8 are being held. CLAD will hold these 8 for further review and discussion until such time as the Province makes a decision on whether these applications will be approved and titles issued.

This week CLAD received another application for lands approximately 6 km northeast of Quinn Lake. CLAD is unsure if this site will be of concern to your client.

I am advised the ledger is missing but CLAD had scanned the book while it was in its possession. The ledger [a huge volume] was returned by CLAD to the Department of Natural Resources. CLAD understands that Department has a scanned version of the ledger as well. CLAD is currently unaware of any other cabins in the area whose owners held permits from Abitibi Consolidated, however, it acknowledges that others may come forward. CLAD will review any additional sources of information which may become available and which may help identify others who held Abitibi Permits for cabins in the area. I will ask CLAD if it can review the scanned version of the ledger to see if it identifies any other permits in the area of interest to your client. If there are others identified I will let you know.

I trust this is of some help and thank you again.

herb

“*This email and any attached files are intended for the sole use of the primary and copied addressee(s) and may contain privileged and/or confidential information. Any distribution, use or copying by any means of this information is strictly prohibited. If you received this email in error, please delete it immediately and notify the sender.*”
Strowbridge, Kerry

From: Primmer, Rodger
Sent: Tuesday, May 15, 2018 8:35 AM
To: Edwards, Herb
Cc: Morgan, Tara; Mercer, Dave W; Barnable, Steve
Subject: RE: Marathon Lake

Good Morning Herb,

I think it may be at the Howley Building but not sure. Can you confirm Steve?

Rodger

From: Edwards, Herb
Sent: Tuesday, May 15, 2018 8:33 AM
To: Primmer, Rodger
Cc: Morgan, Tara; Mercer, Dave W
Subject: RE: Marathon Lake

Hi Rodger

That would be great, I’d like to get something together to get back to Ms. Staniland by tomorrow.

Copies of the applications would be good too.

The ledger—is the copy of that at the Howley Building?

Thanks again.

herb

From: Primmer, Rodger
Sent: Monday, May 14, 2018 3:53 PM
To: Edwards, Herb <herbedwards@gov.nl.ca>
Cc: Morgan, Tara <taramorgan@gov.nl.ca>; Mercer, Dave W <davemercer@gov.nl.ca>
Subject: RE: Marathon Lake

Hi Herb,

No problem, We will get these numbers together right away. We will check for any other titles that may be issued in the area. Do you want copies of the applications for the active ones?

Rodger

From: Edwards, Herb
Sent: Monday, May 14, 2018 3:40 PM

Sec 30 (1)(a)
To: Primmer, Rodger  
Subject: FW: Marathon Lake  

Hi Rodger  

I got a call from Marathon’s solicitor, Tauna Staniland and she indicates that Marathon has a meeting on Thursday with the Premier. She is looking to see if there is anything we can provide to them. The copy of the ledger we have would be in the Howley Building?  

herb  

From: Edwards, Herb  
Sent: Thursday, May 10, 2018 8:54 AM  
To: Primmer, Rodger <rprimmer@gov.nl.ca>  
Subject: RE: Marathon Lake  

Thanks Rodger  

My notes indicate that there are 9 applications with CLAD now which have permits issued by Abitibi. Can you confirm that number? Are these presently on hold? Marathon talked about a 9 month hold – which they said CLAD advised them of – are you aware of that or do you know if it is in policy?  

How many other applications has CLAD received from others with no permit issued by Abitibi?  

How many titles has CLAD issued in the area of interest to Marathon?  

Thanks a lot.  

herb  

From: Primmer, Rodger  
Sent: Wednesday, May 9, 2018 3:03 PM  
To: Edwards, Herb <herbedwards@gov.nl.ca>  
Cc: Morgan, Tara <taramorgan@gov.nl.ca>  
Subject: RE: Marathon Lake  

Hi Herb,  

I would think the information requested would have to be done through an ATIPP request? We wouldn’t normally provide applications submitted by individuals to a third party without the applicant’s consent. There is personal contact information on our applications. We have already generally explained the process we follow and the requirements which must be met by the applicants.  

Rodger
Hi Rodger

I hope you enjoyed your time away.

Thank you

herb

I understand that my client Marathon Gold met with Crown Lands (Rodger Primmer and Tara Morgan) yesterday who advised them that certain surface rights applicants in the Valentine Lake area have indicated that their rights are predicated on Abitibi cabin permits. We understand that Crown lands has indicated that none of these applications have been granted thus far, but that these applications are being considered in light the claims of prior Abitibi permits.

We advise that Marathon Gold is doing its own due diligence with respect to any Abitibi rights in the Valentine Lake area.

In the interim we ask that Crown Land provide Marathon Gold with copies of all the applications for surface rights so that we can understand (i) the purposes of such applications, (ii) the terms of the surface rights sought, and (iii) the basis of the predecessor rights claimed.

We note that the Mineral Act provides that the if the surface rights are required when a mining lease is granted in the area, then the Crown is required to grant the surface rights to the mining lease holder and must enter into private bargains with or expropriate those rights from third parties in order to provide the surface rights to the Mining Lease holder. Given that the areas under application are of key importance to the Valentine Lake project and Marathon will need these surface rights when the mineral licences are converted to a mining lease in short order, the Government may find itself in a position where it has to expropriate lands that it has recently granted.

As a result, we would ask that Crown Lands continue to hold off on all of these applications until appropriate due diligence can be done on all sides and all parties can fully assess the situation. Can you please let me know the government’s position and plan with respect to these applications and provide us with details of the applications at your earliest opportunity.

Thank you,
Tauna
From: Primmer, Rodger
Sent: Monday, May 14, 2018 3:45 PM
To: Mercer, Dave W
Subject: FW: Marathon Lake

Dave:

I believe you did some review on the GIS concerning cabin titles in this area. We need to get this info. for Herb ASAP so he can provide to Marathon prior to their meeting.

I have some of the active application files in my office.

Rodger

From: Edwards, Herb
Sent: Monday, May 14, 2018 3:40 PM
To: Primmer, Rodger
Subject: FW: Marathon Lake

Hi Rodger

I got a call from Marathon’s solicitor, Tauna Staniland and she indicates that Marathon has a meeting on Thursday with the Premier. She is looking to see if there is anything we can provide to them. The copy of the ledger we have would be in the Howley Building.

herb

From: Edwards, Herb
Sent: Thursday, May 10, 2018 8:54 AM
To: Primmer, Rodger <primer@gov.nl.ca>
Subject: RE: Marathon Lake

Thanks Rodger

My notes indicate that there are 9 applications with CLAD now which have permits issued by Abitibi. Can you confirm that number? Are these presently on hold? Marathon talked about a 9 month hold – which they said CLAD advised them of – are you aware of that or do you know if it is in policy?

How many other applications has CLAD received from others with no permit issued by Abitibi?

How many titles has CLAD issued in the area of interest to Marathon?

Thanks a lot.
From: Primmer, Rodger  
Sent: Wednesday, May 9, 2018 3:03 PM  
To: Edwards, Herb <herbedwards@gov.nl.ca>  
Cc: Morgan, Tara <taramorgan@gov.nl.ca>  
Subject: RE: Marathon Lake

Hi Herb,

I would think the information requested would have to be done through an ATIPP request? We wouldn’t normally provide applications submitted by individuals to a third party without the applicant’s consent. There is personal contact information on our applications. 

We have already generally explained the process we follow and the requirements which must be met by the applicants.

Rodger

From: Edwards, Herb  
Sent: Wednesday, May 09, 2018 2:06 PM  
To: Primmer, Rodger  
Subject: Marathon Lake

Hi Rodger

I hope you enjoyed your time away.

Thank you

herb

I understand that my client Marathon Gold met with Crown Lands (Rodger Primmer and Tara Morgan) yesterday who advised them that certain surface rights applicants in the Valentine Lake area have indicated that their rights are predicated on Abitibi cabin permits. We understand that Crown lands has indicated that none of these applications have been granted thus far, but that these applications are being considered in light the claims of prior Abitibi permits. We advise that Marathon Gold is doing its own due diligence with respect to any Abitibi rights in the Valentine Lake area. In the interim we ask that Crown Land provide Marathon Gold with copies of all the applications for surface rights so that we can understand (i) the purposes of such applications, (ii) the terms of the surface rights sought, and (iii) the basis of the predecessor rights claimed.

We note that the Mineral Act provides that the if the surface rights are required when a mining lease is granted in the area, then the Crown is required to grant the surface rights to the mining lease holder and must enter into private bargains with or expropriate those rights from third parties in order to provide the surface rights to
the Mining Lease holder. Given that the areas under application are of key importance to the Valentine Lake project and Marathon will need these surface rights when the mineral licences are converted to a mining lease in short order, the Government may find itself in a position where it has to expropriate lands that it has recently granted.

As a result, we would ask that Crown Lands continue to hold off on all of these applications until appropriate due diligence can be done on all sides and all parties can fully assess the situation. Can you please let me know the government’s position and plan with respect to these applications and provide us with details of the applications at your earliest opportunity.

Thank you,
Tauna
All,
Please note that the meeting time has been moved to accommodate Mr. Walford's in person attendance. The meeting will occur on the 7th floor Natural Resources building or through call in.

A. Call coordinates:
1.844.220.3466 OR 709.570.2074 CONFERENCE ID/PASSCODE: [Blank]

A. Agenda
- Safety Moment
- Review discussion of March 21-18 with Crown Lands (CL) - Cabin locations and application process
- 2016 NR position regarding cabin location- December 2, 2016
- Revised NR position regarding cabin location- January 18, 2018
- Next steps
- Adjournment

Sent: Thu 1/18/2018 1:18 PM

URGENT - REVISED Mines Branch response to Crown land application 150213 [Blank] grant)

Sec 29 (1)(a)

Below is the REVISED Mines Branch response to Crown land application 150213 (Sec 29 (1)(a) grant):

Recommendation: [Blank]
Comments: [Blank]
This response replaces the previous Mines Branch response submitted December 2, 2016.

*Please acknowledge receipt of our response.* If you have any questions, please do not hesitate to contact me.

**Sent: Friday, December 02, 2016 1:30 PM**

Below is the Mines Branch response to Crown land application 150213 (Sec 40(1) grant):

**Recommendation:** Approval (conditional). **Comments:** The applied-for grant overlaps with a mineral licence that is, along with an adjacent mineral licence to the south, presently subject to a large-scale mineral exploration program carried out by Marathon Gold Corp. The present day exploration program has its roots in the discovery of the Leprechaun Pond gold occurrence in the mid-1980s located 4 km west of the Victoria River dam. The exploration program includes prospecting, diamond drilling, trenching, access trail preparation, and access road construction, and is focused on discovering and evaluating widespread occurrences of gold mineralization located between Valentine Lake and the Victoria River. Several gold deposits have been recognized to date and a large-scale mining operation is a realistic future possibility. The applied-for grant shall not provide cause to impede or obstruct, in its vicinity, mineral exploration, mining, or road construction, nor access related to these activities. The applicant, by signing the title document, indicates that they have read and understood these comments.
Agreed.

Thanks

Tara

Tara Morgan
Director (A), Crown Lands Division
Department of Fisheries and Land Resources

Tel: (709) 637-2093  Fax: (709) 637-2004

Hi Tara

Thanks, I'll go, it would be helpful if Rodger could participate too.

herb

From: Morgan, Tara
Sent: Wednesday, April 4, 2018 12:18 PM
To: Edwards, Herb <herbedwards@gov.nl.ca>
Subject: RE: Meeting at 2

6th floor NR building or conference call.

1.844.220.3466 or 709.570.2074

Tara

Tara Morgan
Director (A), Crown Lands Division
Department of Fisheries and Land Resources
Where is the meeting?

Hi there,

M&E are having a meeting at 2 this afternoon to discuss the cottage applications in and around Valentine Lake and have invited us to attend.

Tracey Pennell is the solicitor for M&E and has asked for the meeting as she has been in touch with Tauna Staniland from Stewart Mckelvey, Marathons lawyer. Ms. Staniland will be attending Thursday’s meeting and wanted to reach out to Tracey in advance to indicate what Marathon’s concerns are re surface rights and the potential for cabin rights to be provided by Crown Lands and that they hope to have a plan on next steps following Thursday’s meeting.

Tracey is reviewing the “interworkings between the mining legislation and crown lands legislation.” Herb, I’m not sure if she’s been in touch, but wants to make sure that she is up to speed on what the issues are, what NR has undertaken to date and where Crown Lands is.

I realize this is very short notice, but if you available to attend it would be appreciated.

Thanks

Tara

Tara Morgan
Director (A), Crown Lands Division
Department of Fisheries and Land Resources

Tel: (709) 637-2093  Fax: (709) 637-2004
Hi Tara,

Please see attached a map that I have prepared showing the location of Marathon's various deposits, proposed infrastructure and the area for a crown lands freeze that NR had previously suggested in response to an ILUC proposal on opening up the former Abitibi lands to public application. As an insert I have included the outline of the AND Charter lands and Reid Lots previously held by Abitibi to speak to the notion that these cabins are illegal.

Justin Lake
Manager, Mineral Rights

Department of Natural Resources
Government of Newfoundland and Labrador

Telephone: 709-729-8437
Fax: 709-729-8782
Address: 50 Elizabeth Avenue, P.O. Box 8700, St. John's, NL, Canada A1B 4J6
Hi Keith,

Perry has asked that I attend a meeting this afternoon with regards to preparation for their meeting with Marathon on Thursday. Tracey Pennell with JPS is their solicitor and has requested the meeting with M&E at 2 and we have been invited to attend.

I’ve asked Rodger and Herb to attend, you certainly could too but I don’t think it’s required. Just wanted to keep you informed.

T

Tara Morgan
Director (A), Crown Lands Division
Department of Fisheries and Land Resources

Tel: (709) 637-2093  Fax: (709) 637-2004
Call in #: 1.844.220.3466 or 709.570.2074

ID: [redacted]

Invited people: (plus, Herb and Rodger)

- Canning, Perry
- Pennell, Tracey
- Sheppard, Kevin
- Lake, Justin W
- Hinchey, Stephen
- Morgan, Tara
- Butland, Anne

The agenda for tomorrow’s meeting between Marathon and M&E for your information is:

- Safety Moment
- Review discussion of March 21-18 with Crown Lands (CL) - Cabin locations and application process
- 2016 NR position regarding cabin location - December 2, 2016
- Revised NR position regarding cabin location - January 18, 2018
- Next steps
- Adjournment

Sent: Thu 1/18/2018 1:18 PM

URGENT - REVISED Mines Branch response to Crown land application 150213 [redacted] grant

Below is the REVISED Mines Branch response to Crown land application 150213 [redacted] grant:

Recommendation: [redacted]

Comments: [redacted]
This response replaces the previous Mines Branch response submitted December 2, 2016.

Please acknowledge receipt of our response. If you have any questions, please do not hesitate to contact me.

Sent: Friday, December 02, 2016 1:30 PM
Below is the Mines Branch response to Crown land application 150213 (Sec 40(1) grant):

Recommendation: Approval (conditional). Comments: The applied-for grant overlaps with a mineral licence that is, along with an adjacent mineral licence to the south, presently subject to a large-scale mineral exploration program carried out by Marathon Gold Corp. The present day exploration program has its roots in the discovery of the Leprechaun Pond gold occurrence in the mid-1980s located 4 km west of the Victoria River dam. The exploration program includes prospecting, diamond drilling, trenching, access trail preparation, and access road construction, and is focused on discovering and evaluating widespread occurrences of gold mineralization located between Valentine Lake and the Victoria River. Several gold deposits have been recognized to date and a large-scale mining operation is a realistic future possibility. The applied-for grant shall not provide cause to impede or obstruct, in its vicinity, mineral exploration, mining, or road construction, nor access related to these activities. The applicant, by signing the title document, indicates that they have read and understood these comments.

Thanks

Tara

Tara Morgan
Director (A), Crown Lands Division
Department of Fisheries and Land Resources
Tel: (709) 637-2093  Fax: (709) 637-2004
They are planning to meet tomorrow (April 3, 2pm – 3pm).

Forgot the agenda:

-----Original Appointment-----
From: Canning, Perry
Sent: Monday, April 2, 2018 9:01 AM
To: Canning, Perry; Kevin Sheppard (KevinSheppard@gov.nl.ca); Pennell, Tracey; Sherry Dunsworth; Phil Walford; Hinchey, Stephen
Subject: Marathon- Cabin Issues
When: Tuesday, April 3, 2018 2:00 PM-3:00 PM (UTC-03:30) Newfoundland.
Where: NR-STIH-RM-MR-NR Bldg (6), MeetingRoom-FL7
Importance: High

Good morning Sherry.
I did attempt to call you on Saturday March 31st, at (709) I called again this morning to discuss your concerns.
I propose that we meet in person or by conference call on Tuesday to discuss and have invited Tracey Pennell, a Justice and Public Safety Solicitor for NR to join.

Call coordinates:
1.844.220.3466 OR 709.570.2074 PIN

Agenda
- Safety Moment
- Review discussion of March 21-18 with Crown Lands (CL) - Cabin locations and application process
- 2016 NR position regarding cabin locations- December 2, 2016
- Revised NR position regarding cabin location- January 18, 2018
- Next steps
- Adjournment

Sent: Thu 1/18/2018 1:18 PM

URGENT - REVISED Mines Branch response to Crown land application 150213

Below is the REVISED Mines Branch response to Crown land application 150213:
applied-for grant area, we feel that – given the economic significance of a potential future mining operation involving the Marathon deposit and taking into account its potential infrastructure requirements – this case is exceptional and therefore that the Crown land application process should be temporarily halted pending the outcome of our review.

This response replaces the previous Mines Branch response submitted December 2, 2016.

Please acknowledge receipt of our response. If you have any questions, please do not hesitate to contact me.

Sent: Friday, December 02, 2016 1:30 PM
Below is the Mines Branch response to Crown land application 150213 (Sec 40(1) grant):

Recommendation: Approval (conditional). Comments: The applied-for grant overlaps with a mineral licence that is, along with an adjacent mineral licence to the south, presently subject to a large-scale mineral exploration program carried out by Marathon Gold Corp. The present day exploration program has its roots in the discovery of the Leprechaun Pond gold occurrence in the mid-1980s located 4 km west of the Victoria River dam. The exploration program includes prospecting, diamond drilling, trenching, access trail preparation, and access road construction, and is focused on discovering and evaluating widespread occurrences of gold mineralization located between Valentine Lake and the Victoria River. Several gold deposits have been recognized to date and a large-scale mining operation is a realistic future possibility. The applied-for grant shall not provide cause to impede or obstruct, in its vicinity, mineral exploration, mining, or road construction, nor access related to these activities. The applicant, by signing the title document, indicates that they have read and understood these comments.

Thanks

Tara

Tara Morgan
Director (A), Crown Lands Division
Department of Fisheries and Land Resources

Tel: (709) 637-2093  Fax: (709) 637-2004
Hi Keith,

Thanks for signing those documents for us. Much appreciated.

I took a call from Perry Canning this morning, he is meeting with Marathon this week (tomorrow likely) with the agenda below. He wasn't sure if Crown Lands wanted to be part of the call or not. He wasn’t pushing for representation but wanted to include us if we did want to attend.

I’m still digging up some information. Regardless if we attend or not, I think we need to discuss it before the meeting and at least let them know where we are. I should be ready to discuss with you later this afternoon if you are available.

Thanks

Tara

Tara Morgan
Director (A), Crown Lands Division
Department of Fisheries and Land Resources

Tel: (709) 637-2093  Fax: (709) 637-2004
Hi Keith,

Are you meeting with the ADM for NR today? Did I give you enough information regarding my meeting with Marathon this week? You may get asked about it.

Also —

Thanks

Tara

Tara Morgan
Director (A), Crown Lands Division
Department of Fisheries and Land Resources

Tel: (709) 637-2093  Fax: (709) 637-2004
Yes. I’ll add you now

Sent from my iPhone

On Mar 21, 2018, at 10:33 AM, Sheppard, Kevin <KevinSheppard@gov.nl.ca> wrote:

Hi Tara:

Is everything still okay for the meeting at 11. I await your skype call.

Thanks
Kevin

From: Morgan, Tara
Sent: Tuesday, March 20, 2018 1:53 PM
To: Sheppard, Kevin
Subject: RE: Timing of a meeting in Corner Brook between Marathon Gold, NR and Crown Lands?

Ok, that works. Just join in on the meeting using the skype link. If we need to I’ll patch you in on the phone at that time.

I still haven’t been able to get into the room yet to get a #.

Thanks

Tara

Tara Morgan
Director (A), Crown Lands Division
Department of Fisheries and Land Resources
Tel: (709) 637-2093  Fax: (709) 637-2004

From: Sheppard, Kevin
Sent: Tuesday, March 20, 2018 12:33 PM
To: Morgan, Tara <taramorgan@gov.nl.ca>
Subject: RE: Timing of a meeting in Corner Brook between Marathon Gold, NR and Crown Lands?

I have Skype, but no camera. I have a headset with microphone and can connect to see the presentation.
Hi Kevin,

Do you have access to Lync/Skype? I'm not sure the # in the boardroom – can you provide a # and I can call you?

There’s a meeting in there right now, when that’s done I’ll go see if I can get the #.

Thanks

Tara

Tara Morgan
Director (A), Crown Lands Division
Department of Fisheries and Land Resources

Tel: (709) 637-2093 Fax: (709) 637-2004

Hi Tara:

I plan to teleconference – please provide me the call-in information.

Thanks

Kevin

Great –

We are at 117 Riverside Drive (Brake’s Cove). From [Cox’s Cove exit], you’ll pass the Noton Building, a brick building with the pedway over the parking lot on the right, then Atlantic Ready Mix. We are the next driveway after that, a flat one level brown/beige steel building on the right. I believe the sign on the front near the road says Environment and Conservation, Wildlife Division.

Thanks

Tara
Hello Tara,

Yes, I can meet tomorrow morning at 11:00 in your Corner Brook office and I will bring a long a short power-point presentation.

What is the address?

Thank you, Sherry

On Tue, Mar 20, 2018 at 8:55 AM, Morgan, Tara <taramorgan@gov.nl.ca> wrote:

Hi Sherry,

How is tomorrow morning at 11? I'll have it arranged so that our staff in the Central office can join by skype. If you have a presentation or anything you'd like to share please bring them on a flash drive.

Thanks

Tara

Tara Morgan
Director (A), Crown Lands Division
Department of Fisheries and Land Resources

Tel: (709) 637-2093  Fax: (709) 637-2004
From: Sherry Dunsworth [mailto:********@gmail.com]
Sent: Friday, March 16, 2018 10:08 AM
To: Morgan, Tara <taramorgan@gov.nl.ca>
Cc: Sheppard, Kevin <KevinSheppard@gov.nl.ca>
Subject: Re: Timing of a meeting in Corner Brook between Marathon Gold, NR and Crown Lands?

Thank you Tara,

I look forward to meeting with you.

I am available to meet Mon, Tues afternoon and Wed of next week (April 19, 20 & 21). After that I am available Thurs, Mar 29th & Fri, Mar 30th.

Regards, Sherry

On Fri, Mar 16, 2018 at 10:00 AM, Morgan, Tara <taramorgan@gov.nl.ca> wrote:

Hi Sherry

I’m trying to schedule another meeting. Once I have that settled I’ll be able to confirm the day. I should be able to do that soon.

Tara

Sent from my iPhone

On Mar 14, 2018, at 12:49 PM, Sherry Dunsworth <********@gmail.com> wrote:

Hi Tara and Kevin,
Both Tues afternoon and Wednesday morning work for me.

I live in [redacted] and therefore I would attend the meeting in person at your Corner Brook office. I will bring along a power-point presentation to assist with introducing the Valentine Lake Project to your team and discussing the current cabin applications relative to the project footprint.

Thank you, Sherry

On Wed, Mar 14, 2018 at 11:06 AM, Morgan, Tara <taramorgan@gov.nl.ca> wrote:

Hi Kevin/Sherry,

Would Tuesday afternoon (March 20) or the morning of Wednesday (March 21) work?

I am located in Corner Brook but have staff in Central that would likely attend as well.

Sherry, I understand that you will be in St. John’s. I can have a boardroom available with Skype capabilities and we can meet “face to face” and share presentations that way if that’s more convenient.

Thanks

Tara
Hi Tara:

I am following up on my phone calls last week to determine an appropriate time when Marathon could meet with your department.

Below are times when a Marathon official is available.

Please advise.

Thank you

Kevin

Sec 40(1)
Hello Kevin,

I am wondering if you have had any progress with setting up a meeting in Corner Brook between yourself, Crown Lands and Marathon Gold?

I am leaving for Toronto tomorrow morning and not back from PDAC until Thursday night, March 8th, I am available anytime between March 12 - 16, and March 19-21 (into St. John's for an Environmental seminar March 22-23), so perhaps that timing can work for you and Crown Lands?

Please advise.

Thank you, Sherry

--

Sherry Dunsworth, M.Sc., P.Geo.

SVP Exploration

Marathon Gold Corporation

P.O.Box 160,

Pasadena, NL, A0L 1K0

Tel: 1.709.686.0153

Cell: [Redacted]

Fax: 1.709.686.2317

sherrydunsworth@gmail.com

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Sherry Dunsworth, M.Sc., P.Geo.

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Marathon Gold Corporation

P.O.Box 160,
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Sherry Dunsworth, M.Sc., P.Geo.
SVP Exploration
Marathon Gold Corporation
P.O.Box 160,
Pasadena, NL, A0L 1K0
Tel: 1.709.686.0153
Cell: [redacted]
Fax: 1.709.686.2317
[redacted]@gmail.com
Strowbridge, Kerry

Subject: Marathon Gold
Location: Skype Meeting

Start: Wed 3/21/2018 11:00 AM
End: Wed 3/21/2018 12:00 PM
Show Time As: Tentative

Recurrence: (none)
Meeting Status: Not yet responded

Organizer: Morgan, Tara
Required Attendees: Primmer, Rodger

→ Join Skype Meeting
Trouble Joining? Try Skype Web App

Help
Hi Keith,

I meant to mention this to you earlier today when we met but it slipped my mind.

I have been in touch with Kevin Sheppard and he indicated to me that [redacted] They had asked that we meet with Marathon so that Marathon could give us an overview of their operations and business so that we may have better awareness of their needs and challenges as we manage land in areas where they operate. The meeting was requested for this week or next week. I didn’t get back to Kevin until this week so Perry may have been wanting to ask about that.

This meeting is being scheduled for either Tuesday am or Wednesday pm of next week. I’d like to get the DM’s meeting scheduled first and then schedule around that if possible, however will schedule the meeting tomorrow regardless as their timeframe is limited.

Kevin thought that Perry wanted to talk to you about Marathon in general and governments support of their operation, I guess to make sure we are on the same page.

I can be available to meet with you and Perry on Friday after our OCIO meeting if you’d like.

Thanks

Tara

Tara Morgan
Director (A), Crown Lands Division
Department of Fisheries and Land Resources

Tel: (709) 637-2093  Fax: (709) 637-2004
Hi

Are you available on Tuesday morning or Wednesday afternoon next week? Marathon Gold would like to give us an overview of their operations.

You can bring in anyone from the region that you think might need to be involved. They’ll be in Corner Brook with me and we can skype you guys in.

Thanks

Tara
Hi Kevin,

Jonathan is in Goose Bay this week. Next week would be preferable. Who would be at this meeting? I’m wondering if there’s a need for our ADM to join.

Thanks

Tara

Tara Morgan
Director (A), Crown Lands Division
Department of Fisheries and Land Resources
Tel: (709) 637-2093  Fax: (709) 637-2004

Hi Tara:

I am following up on my phone calls last week to determine an appropriate time when Marathon could meet with your department.

Below are times when a Marathon official is available.

Please advise.

Thank you
Kevin

Sec 40(1)

From: Sherry Dunsworth [mailto:sherry.dunsworth@gmail.com]
Sent: Tuesday, February 27, 2018 2:54 PM
To: Sheppard, Kevin
Subject: Timing of a meeting in Corner Brook between Marathon Gold, NR and Crown Lands?

Hello Kevin,
I am wondering if you have had any progress with setting up a meeting in Corner Brook between yourself, Crown Lands and Marathon Gold?

I am leaving for Toronto tomorrow morning and not back from PDAC until Thursday night, March 8th, I am available anytime between March 12 - 16, and March 19-21 (into St. John's for an Environmental seminar March 22-23), so perhaps that timing can work for you and Crown Lands?

Please advise.

Thank you, Sherry

---

Sherry Dunsworth, M.Sc., P.Geo.
SVP Exploration
Marathon Gold Corporation
P.O.Box 160,
Pasadena, NL, A0L 1K0
Tel: 1.709.686.0153
Cell: [redacted]
Fax: 1.709.686.2317
sherrynd@ gmail.com
No change.

Thanks

Tara

Tara Morgan
Director (A), Crown Lands Division
Department of Fisheries and Land Resources

Tel: (709) 637-2093 Fax: (709) 637-2004

From: Primmer, Rodger
Sent: Monday, March 12, 2018 12:22 PM
To: Morgan, Tara <taramorgan@gov.nl.ca>
Subject: FW: Cottage Valentine Lake: Application NO: 150231

Hi,

FYI, This is one of the ones Marathon Gold Corp. had concerns with. You copied me on your response to Mines as to our position. We will proceed to process the survey and forward to Titles Office unless there has been any change.

Rodger

From: [mailto:********@hotmail.com]
Sent: Monday, March 12, 2018 12:13 PM
To: Primmer, Rodger
Cc: Sears, Nick
Subject: Cottage Valentine Lake: Application NO: 150231

Good Day Mr. Primmer

I'm writing to enquire the Status of my application regarding my cabin at Valentine/Victory lake valley. Application No: 150213. My application was approved in Sept 2017 pending Approval for sewage design submitted by a registered designer and a crown land survey by a registered surveyor. A Land survey and sewage design was submitted to Crown Lands in Dec 2017. I received Approval for the sewage design from Environmental Health Jan 10th 2018. I called crown lands in January 2018 to enquire the Status of my application and at that time I was told they never had any record of the land survey. I called Red Indian Surveys Limited and was told a copy of the survey was sent to crown land on Dec 19th. Red Indian Surveys resent the land survey and I called crown lands again that same day and was told they received the survey. As to
date; I have not heard anything from Crown Lands. These last two steps (land survey and sewage design) was the final steps. I was wondering if you could update me as to the Statius of my application.

Regards

Sec 40(1)
Strowbridge, Kerry

From: Primmer, Rodger
Sent: Friday, February 16, 2018 11:48 AM
To: Morgan, Tara
Subject: RE: Surface Rights - Valentine Lake Area

These are the pending applications in the area identified by Marathon, there are actually 9 in total:

- 140436 - Mines approved March 21, 2017 – Awaiting LMS referral response
- 140823 - Mines Approved March 21, 2017 – RLC awaiting review
- 150213 - Mines Approved Dec. 2, 2016 – Approved (Survey & septic received)
- 151398 - Mines Approved March 28, 2017 – Awaiting Wildlife Division and LMS referral responses
- 151355 - Mines approved March 27, 2017 – Awaiting LMS referral response
- 151372 - Mines approved March 27, 2017 – Awaiting Wildlife Division and LMS referral responses
- 150439 - Mines approved Feb. 20, 2017 – RLC awaiting review

These are all on former Abitibi lands and as far as we know, cabins exist on the land for all of these with the exception of one (redacted) she indicated site not presently occupied on her CL application however aerial photography indicates development on the site.

Regards,

Rodger

From: Morgan, Tara
Sent: Thursday, February 15, 2018 5:57 PM
To: Sheppard, Kevin
Cc: Canning, Perry; Lake, Justin W; Hinchey, Stephen; Pelletier, Randy; Primmer, Rodger
Subject: RE: Surface Rights - Valentine Lake Area

Hi Kevin,

There are 7 applications pending in the area identified by Marathon. We have held those applications at present, however I have asked the region to identify where in the process those applications are. While these are applications, these properties may already have structures on them that were appropriately approved by Abitibi so the review is not as straightforward as an application where nothing is already existing.

We take our direction from your shop so I’m not sure if a presentation by Marathon to us would be absolutely needed at this time, but it is something that could be considered. I think you are right though another conference call between us may be appropriate.

When we identify where the applications are in the system we can arrange a time to discuss.
Thanks

Tara

Tara Morgan
Director (A), Crown Lands Division
Department of Fisheries and Land Resources

Tel: (709) 637-2093  Fax: (709) 637-2004

From: Sheppard, Kevin
Sent: Thursday, February 8, 2018 2:37 PM
To: Morgan, Tara <taramorgan@gov.nl.ca>
Cc: Canning, Perry <PerryCanning@gov.nl.ca>; Lake, Justin W <JustinWLake@gov.nl.ca>; Hinchey, Stephen <StephenHinchey@gov.nl.ca>; Pelletier, Randy <RandyPelletier@gov.nl.ca>
Subject: RE: Surface Rights - Valentine Lake Area

Hi Tara:

NR submitted a revised response to Crown Land application 150213 on January 18, 2018 and indicated that the application process should be temporarily halted pending the outcome of our review. [Sec 29 (1)(a)]

Following NR’s original response to application 150213 in 2016, NR outlined an area corresponding to the Valentine Lake project (but not all of the licenced area) within which there would be a high probability that any Crown land application would be rejected. [Sec 29 (1)(a)]

Only the application for 150213 is in relative close proximity to Marathon’s proposed developments. The remaining applications to the northeast that are outside of the outlined area are no closer than approximately three kilometres from Marathon’s current proposed developments. A cabin indicated on Marathon’s plan to the southwest of 150213 is not part of any application that NR is aware of. This cabin is directly within some of Marathon’s proposed infrastructure developments and within the outlined area noted above.

You are encouraged to have the company deliver a presentation to your department so that you may fully understand the scope of their proposed mining operation, including the significance of the 500-metre blasting buffer surrounding the proposed Marathon Pit.

We should plan to teleconference so that we can also engage NR’s legal counsel (Randy copied here) to discuss further.

Kevin
Hi Kevin,

We have not responded to this, I’m just wondering your thoughts.

Thanks

Tara

Tara Morgan
Director (A), Crown Lands Division
Department of Fisheries and Land Resources
Tel: (709) 637-2093  Fax: (709) 637-2004

From: Primmer, Rodger
Sent: Wednesday, February 7, 2018 8:48 AM
To: Morgan, Tara <taramorgan@gov.nl.ca>
Subject: FW: Surface Rights - Valentine Lake Area

FYI,

Will we hold processing of any applications in this area for now?

Rodger

From: Tauna M. Staniland [mailto:tstaniland@stewartmckelvey.com]
Sent: Tuesday, February 06, 2018 2:30 PM
To: Primmer, Rodger; Mercer, Dave W; Edwards, Herb
Subject: FW: Surface Rights - Valentine Lake Area

Good afternoon Rodger, Dave and Herb,

Further to my correspondence below I confirm that we have received information from Dave on both issued surface rights and applications for surface rights over the areas of the Marathon Gold mineral licences. On a very positive note it appears that there have not been any recent surface rights issued other than those issued to Marathon Gold. However, it does appear that there are seven applications in process and that a number of these applications are in and around areas that are of critical importance to Marathon (including on the site of planned infrastructure and within the blast radius from identified gold deposits). As a result, Marathon would like to get a sense of where these applications stand and to get some assurances that these applications will not be granted at this time.

Sec 29 (1)(a)
Please let us know what the best way to move forward on this issue is. If it would be helpful, we would propose to arrange for a meeting directly between Marathon and an appropriate representatives of Crown Lands so that Marathon can give you a current overview of the project (infrastructure and deposits) and you can get a sense of why the applied for surface rights will be problematic.

We very much appreciate your assistance on this and we look forward to discussing with you further.

Regards,
Tauna

---

From: Tauna M. Staniland
Sent: Tuesday, January 23, 2018 10:53 AM
To: rprimmer@gov.nl.ca
Cc: Edwards, Herb <herbedwards@gov.nl.ca>
Subject: Surface Rights - Valentine Lake Area

Hi Rodger,

I am legal counsel for Marathon Gold Corporation which holds a number of mineral licences in the Valentine Lake Area. Marathon’s gold exploration project has been very successful in identifying a number of high grade gold deposits and Marathon is in the process of undertaking a pre-feasibility study, which among other things will set out the location of mine infrastructure (such as primary crushing facilities, stock piles, heap leach pads and tailings storage) supporting the mining of gold deposits. [Sec. 30(2)]

However, it is still not clear to Marathon if any surface rights have already been granted over the licence areas or if any applications are in process (and already passed the DNR approval stage). As result, we are seeking clarification on what surface rights exist in these areas.

I am attaching a map of the Marathon licence areas. We would very much appreciate it if you could find out if any surface rights have been granted in these areas or if any surface rights applications are in process. If surface rights have been granted or applications are in process – we would appreciate receiving copies of them so that we can (i) assess their locations vis-à-vis the deposits and mine infrastructure, and (ii) understand the terms of such grants. I note that of particular concern are any granted surface rights or applications over the areas to the right of Valentine lake and along the access roads (identified by red lines) in licences 010899M, 013810M, 010943M and 017230M.
Thanks very much for your assistance with this! Please feel free to call me if you would like to discuss.

Thank you,
Tauna

Stewart McKelvey
Lawyers • Avocats

Tauna M. Staniland
Partner
stewartmckelvey.com/SJohns
D: 709.570.8842
tstaniland@stewartmckelvey.com

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Dave:

Can we check what stage of processing each of these is at?

Rodger

From: Morgan, Tara
Sent: Wednesday, February 14, 2018 5:10 PM
To: Primmer, Rodger
Subject: RE: Surface Rights - Valentine Lake Area

Where are they in the process?

Thanks

Tara

Tara Morgan
Director (A), Crown Lands Division
Department of Fisheries and Land Resources

Tel: (709) 637-2093 Fax: (709) 637-2004

From: Primmer, Rodger
Sent: Wednesday, February 14, 2018 2:02 PM
To: Morgan, Tara <taramorgan@gov.nl.ca>
Subject: FW: Surface Rights - Valentine Lake Area

Hi,

We have 7 active applications in this area which Marathon Gold’s lawyer is questioning. Ms. Staniland is awaiting a response from us concerning her inquiry below. I guess we can advise that we will hold them any decision on them until a further consultation with Mines is completed?

Rodger

From: Primmer, Rodger
Sent: Wednesday, February 07, 2018 8:48 AM
To: Morgan, Tara
Subject: FW: Surface Rights - Valentine Lake Area

FYI,
Will we hold processing of any applications in this area for now?

Rodger

From: Tauna M. Staniland [mailto:tstaniland@stewartmckelvey.com]
Sent: Tuesday, February 06, 2018 2:30 PM
To: Primmer, Rodger; Mercer, Dave W; Edwards, Herb
Subject: FW: Surface Rights - Valentine Lake Area

Good afternoon Rodger, Dave and Herb,

Further to my correspondence below I confirm that we have received information from Dave on both issued surface rights and applications for surface rights over the areas of the Marathon Gold mineral licences. On a very positive note it appears that there have not been any recent surface rights issued other than those issued to Marathon Gold. However, it does appear that there are seven applications in process and that a number of these applications are in and around areas that are of critical importance to Marathon (including on the site of planned infrastructure and within the blast radius from identified gold deposits). As a result, Marathon would like to get a sense of where these applications stand and to get some assurances that these applications will not be granted at this time.

Sec 29 (1)(a)

Please let us know what the best way to move forward on this issue is. If it would be helpful, we would propose to arrange for a meeting directly between Marathon and an appropriate representatives of Crown Lands so that Marathon can give you a current overview of the project (Infrastructure and deposits) and you can get a sense of why the applied for surface rights will be problematic.

We very much appreciate your assistance on this and we look forward to discussing with you further.

Regards,
Tauna

---

From: Tauna M. Staniland
Sent: Tuesday, January 23, 2018 10:53 AM
To: rprimmer@gov.nl.ca
Cc: Edwards, Herb <herbedwards@gov.nl.ca>
Subject: Surface Rights - Valentine Lake Area

Hi Rodger,

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will set out the location of mine infrastructure (such as primary crushing facilities, stock piles, heap leach pads and tailings storage) supporting the mining of gold deposits.

Sec. 30(2)

However, it is still not clear to Marathon if any surface rights have already been granted over the licence areas or if any applications are in process (and already passed the DNR approval stage). As result, we are seeking clarification on what surface rights exist in these areas.

I am attaching a map of the Marathon licence areas. We would very much appreciate it if you could find out if any surface rights have been granted in these areas or if any surface rights applications are in process. If surface rights have been granted or applications are in process – we would appreciate receiving copies of them so that we can (i) assess their locations vis-à-vis the deposits and mine infrastructure, and (ii) understand the terms of such grants. I note that of particular concern are any granted surface rights or applications over the areas to the right of Valentine lake and along the access roads (identified by red lines) in licences 010899M, 013810M, 010943M and 017230M.

Thanks very much for your assistance with this! Please feel free to call me if you would like to discuss.

Thank you,
Tauna

Tauna M. Staniland
Partner
stewartmckelvey.com/StJohns
D: 709.570.8842
tstaniland@stewartmckelvey.com

*******
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Hi,

Not sure if I sent you the message below sent to us on Feb. 6, 2018. Will we advise we will hold off on issuing any approvals on CL applications in process which have not yet received a decision from us pending further consultation with Dept. of Natural Resources?

Rodger

Good morning Rodger, Dave and Herb,

I haven’t had a response to the below message and am wondering if we can set up a time to have a call to discuss. My clients are quite concerned with the applications that are in process on the mineral licence areas and they would like to get an understanding of the status of these applications and next steps.

Please let me know if there is a date and time that works for a call.

Thank you,
Tauna
these applications are in and around areas that are of critical importance to Marathon (including on the site of planned infrastructure and within the blast radius from identified gold deposits). As a result, Marathon would like to get a sense of where these applications stand and to get some assurances that these applications will not be granted at this time.  

Sec 29 (1)(a)

Please let us know what the best way to move forward on this issue is. If it would be helpful, we would propose to arrange for a meeting directly between Marathon and an appropriate representatives of Crown Lands so that Marathon can give you a current overview of the project (infrastructure and deposits) and you can get a sense of why the applied for surface rights will be problematic.

We very much appreciate your assistance on this and we look forward to discussing with you further.

Regards,
Tauna

From: Tauna M. Staniland
Sent: Tuesday, January 23, 2018 10:53 AM
To: rprimmer@gov.nl.ca
Cc: Edwards, Herb <herbedwards@gov.nl.ca>
Subject: Surface Rights - Valentine Lake Area

Hi Rodger,

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Thanks very much for your assistance with this! Please feel free to call me if you would like to discuss.

Thank you,
Tauna

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Partner
stewartmckelvey.com/StJohns
D: 709.570.8842
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Hi Tara:

The planned briefing with Minister Coady on this matter has been rescheduled from today to Friday.

I am sharing this with Perry and Justin for further discussion in the context of FLA’s intentions earlier today to proceed with issuance of the grant.

I will let you know the results of our discussion and subsequent to the minister’s briefing.

Anne: Please arrange a time before the minister’s briefing when Perry, Justin, and I can discuss this further.

Thanks

Kevin

---

Hi Kevin,

We have not responded to this, I’m just wondering your thoughts.

Thanks

Tara

Tara Morgan
Director (A), Crown Lands Division
Department of Fisheries and Land Resources

Tel: (709) 637-2093 Fax: (709) 637-2004

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FYI,
Will we hold processing of any applications in this area for now?

Rodger

From: Tauna M. Staniland
Sent: Tuesday, February 06, 2018 2:30 PM
To: Primmer, Rodger; Mercer, Dave W; Edwards, Herb
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We very much appreciate your assistance on this and we look forward to discussing with you further.

Regards,
Tauna

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From: Tauna M. Staniland
Sent: Tuesday, January 23, 2018 10:53 AM
To: rprimmer@gov.nl.ca
Cc: Edwards, Herb <herbedwards@gov.nl.ca>
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Sec. 30(2)

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Thanks very much for your assistance with this! Please feel free to call me if you would like to discuss.

Thank you,
Tauna

Tauna M. Staniland
Partner
stewartmckelvey.com/StJohns
D: 709.670.8842
tstaniland@stewartmckelvey.com

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Thanks, sounds appropriate.

Rodger

From: Morgan, Tara
Sent: Wednesday, February 07, 2018 10:07 AM
To: Primmer, Rodger
Subject: FW: Valentine Lake

FYI —

[Blacked out text]

This was the response I went back with for your files.

Tara

Tara Morgan
Director (A), Crown Lands Division
Department of Fisheries and Land Resources
Tel: (709) 637-2093  Fax: (709) 637-2004

From: Morgan, Tara
Sent: Wednesday, February 7, 2018 9:59 AM
To: Sheppard, Kevin <KevinSheppard@gov.nl.ca>
Cc: Deering, Keith <keithdeering@gov.nl.ca>
Subject: Valentine Lake

Hi Kevin,

Just following up on our conversation regarding the cabin near the Marathon deposit at Valentine Lake (Application #150213).

Prior to the repatriation of Abitibi lands, Abitibi would permit land for cottage use. When the lands came back to the Crown, the province did not receive an inventory of these permits leaving a lot of these once approved uses and structures on Crown lands without title. To deal with this a policy and procedure were developed to see Crown titles issued to formalize the permits that Abitibi had once provided. Applications to formalize these titles are permitted in line with current policies that now allow for a grant for cottage use.
The applicant [Redacted] (co-applicant [Redacted]) have submitted an application for a grant to formalize their permit which was registered in 2016. In order to apply, they were required to provide evidence that approval had been given by Abibiti previously. The evidence they provided dates back to 2006 and supports their claim.

The application has been reviewed and was conditionally approved on September 8, 2007 and they were required to submit a survey and health design. Both of these have been submitted and are in queue to be reviewed before final title is issued. All referral responses, including that of Mines, Branch recommended approval of the grant, although conditions to not impede development were stipulated.

If there is an issue with the survey or septic that prevents title from being issued I will let you know, however I don’t expect this to be the case.

Thanks

Tara

Tara Morgan
Director (A), Crown Lands Division
Department of Fisheries and Land Resources
Tel: (709) 637-2093 Fax: (709) 637-2004
yes

Hi Kevin,

I have this. Are you available now?

Thanks

Tara

Tara Morgan
Director (A), Crown Lands Division
Department of Fisheries and Land Resources
Tel: (709) 637-2093 Fax: (709) 637-2004

Hi Tara:

Following up on our meeting on Monday regarding the crown land grant application for a cabin near Marathon Gold’s mineral exploration area.

The minister is being briefed this afternoon on various topics, so I would like to get a status update.

Thank you
Kevin
Thanks very much Dave! We will review and will be in touch asap.

Regards,
Tauna

Hi Tauna,

I've attached shape files (Applications and Issued Titles) which show the locations within Marathon's limits.

Regards,

Dave Mercer
Land Management Specialist
Dept. of Fisheries and Land Resources
Crown Lands Administration Division
Government of Newfoundland and Labrador
P.O. Box 2222
Gander, NL  A1V 2N9
T: (709) 256-1407, F: (709) 256-1095
E: davemercer@gov.nl.ca

Hi Dave,

I am following up on the below. Can you please advise if you have found any surface rights granted or applications for surface rights in these areas?

Please let me know.
Thanks,
Tauna

From: Tauna M. Staniland
Sent: Tuesday, January 30, 2018 3:50 PM
To: Mercer, Dave W <davemercer@gov.nl.ca>
Subject: RE: Marathon Gold

Hi Dave,

Marathon has provided me with the attached .shp and .dxf format files for the boundary of the 14 contiguous mineral licences that comprise the Valentine Lake Property. Please confirm if this works for your purposes.

Thank you,
Tauna

From: Tauna M. Staniland
Sent: Tuesday, January 30, 2018 1:40 PM
To: 'Mercer, Dave W' <davemercer@gov.nl.ca>
Subject: RE: Marathon Gold

Thanks Dave! I have asked Marathon if they can forward what you have requested. I will be in touch asap.

Regards,
Tauna

From: Mercer, Dave W [mailto:davemercer@gov.nl.ca]
Sent: Tuesday, January 30, 2018 9:22 AM
To: Tauna M. Staniland <tstaniland@stewartmckelvey.com>
Subject: RE: Marathon Gold
Hi again Tauna,

Due to the scale of the area of interest, GIS shape files or AutoCAD DWG drawings would be preferred.

Regards,

Dave Mercer
Land Management Specialist

Dept. of Fisheries and Land Resources
Crown Lands Administration Division
Government of Newfoundland and Labrador
P.O. Box 2222
Gander, NL A1V 2N9
T: (709) 256-1407, F: (709) 256-1095
E: davemercer@gov.nl.ca

---

From: Tauna M. Staniland [mailto:tstaniland@stewartmckelvey.com]
Sent: Monday, January 29, 2018 6:28 PM
To: Mercer, Dave W
Subject: RE: Marathon Gold

Thanks for getting back to me Dave!

I am attaching a map of the Marathon licence areas. We would very much appreciate it if you could find out if any surface rights have been granted in these areas or if any surface rights applications are in process. If surface rights have been granted or applications are in process – we would appreciate receiving copies of them so that we can (i) assess their locations vis-à-vis the deposits and mine infrastructure, and (ii) understand the terms of such grants. I note that of particular concern are any granted surface rights or applications over the areas to the right of Valentine lake and along the access roads (identified by red lines) in licences 010899M, 013810M, 010943M and 017230M.

Let me know if this map works — otherwise I will go back to Marathon and see if there is another file format I could get.

Regards,
Tauna

---

From: Mercer, Dave W [mailto:davemercer@gov.nl.ca]
Sent: Monday, January 29, 2018 4:06 PM
To: Tauna M. Staniland <tstaniland@stewartmckelvey.com>
Subject: Marathon Gold

Hi Tauna,

Sorry I haven’t gotten back to you sooner. I am the right person to talk to on this matter. I was wondering if you could provide the contact person involved with the mapping at Marathon – that way I can compare the exact locations to the larger area of interest. Tell him or her GIS shape files or AutoCAD DWG drawings would work.
Regards,

Dave Mercer
Land Management Specialist

Dept. of Fisheries and Land Resources
Crown Lands Administration Division
Government of Newfoundland and Labrador
P.O. Box 2222
Gander, NL A1V 2N9
T: (709) 256-1407, F: (709) 256-1095
E: davermercer@gov.nl.ca

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You may already have this but I am sending along again.

Justin Lake
Manager, Mineral Rights

Department of Natural Resources
Government of Newfoundland and Labrador

Telephone: 709-729-6437
Fax: 709-729-6762
Address: 50 Elizabeth Avenue, P.O. Box 8700, St. John's, NL, Canada A1B 4J6
From: Morgan, Tara  
Sent: Monday, February 5, 2018 10:35 AM  
To: Lake, Justin W  
Subject: FW: Marathon Gold Corp- Area Cabins  
Attachments: Valentine - Draft Site Plan with cabins Jan 17,2018.pdf  
Importance: High

Thanks

Tara

Tara Morgan  
Director (A), Crown Lands Division  
Department of Fisheries and Land Resources

Tel: (709) 637-2093  Fax: (709) 637-2004

From: Canning, Perry  
Sent: Thursday, January 18, 2018 8:20 AM  
To: Deering, Keith <keithdeering@gov.nl.ca>  
Cc: Sheppard, Kevin <KevinSheppard@gov.nl.ca>; Morgan, Tara <taramorgan@gov.nl.ca>; Butland, Anne <annebutland@gov.nl.ca>; Haynes, Brenda <bhaynes@gov.nl.ca>; Lake, Justin W <JustinWLake@gov.nl.ca>  
Subject: Marathon Gold Corp- Area Cabins  
Importance: High

Good morning Keith.  
We would like to discuss this issue with you. I have attached Marathon’s draft site plan for your perusal. Anne will be following up with your office to book time.  
Many thanks,  
Perry
From: Morgan, Tara
Sent: Monday, February 05, 2018 9:22 AM
To: Primmer, Rodger
Subject: RE: URGENT - REVISED Mines Branch response to Crown land application 150213 (grant)

Who would be the best one to talk to about this? I've got some questions.

Thanks
Tara

Tara Morgan
Director (A), Crown Lands Division
Department of Fisheries and Land Resources
Tel: (709) 637-2093 Fax: (709) 637-2004

From: Primmer, Rodger
Sent: Monday, February 5, 2018 9:21 AM
To: Morgan, Tara <taramorgan@gov.nl.ca>
Subject: RE: URGENT - REVISED Mines Branch response to Crown land application 150213 (grant)

Hi, We have received survey but it's not checked yet. Septic design approval is received also.

Rodger

From: Morgan, Tara
Sent: Monday, February 05, 2018 9:14 AM
To: Primmer, Rodger
Subject: FW: URGENT - REVISED Mines Branch response to Crown land application 150213 (grant)
Importance: High

What is the status of this application?

I'm on a call now and they asked about it.
Thanks

Tara

Tara Morgan
Director (A), Crown Lands Division
Department of Fisheries and Land Resources

Tel: (709) 637-2093  Fax: (709) 637-2004

From: Hinchey, Stephen
Sent: Thursday, January 18, 2018 1:18 PM
To: Centrallandsoffice <Centrallandsoffice@gov.nl.ca>; Grandy, Jonathan <JonathanGrandy@gov.nl.ca>; Morgan, Tara <taramorgan@gov.nl.ca>
Cc: Canning, Perry <PerryCanning@gov.nl.ca>; Sheppard, Kevin <KevinSheppard@gov.nl.ca>; Rafuse, Heather <HeatherRafuse@gov.nl.ca>; Snow, Matthew <MatthewSnow@gov.nl.ca>; Morrissey, Damien <dmorrissey@gov.nl.ca>
Subject: URGENT - REVISED Mines Branch response to Crown land application 150213 (grant)

Below is the REVISED Mines Branch response to Crown land application 150213 (grant):

Recommendation:

Comments:

This response replaces the previous Mines Branch response submitted December 2, 2016.

Please acknowledge receipt of our response. If you have any questions, please do not hesitate to contact me.

Stephen Hinchey
Land Use and Exploration Monitoring
Mineral Lands Division, Mines Branch, Department of Natural Resources
telephone (709) 729-5748, fax (709) 729-6782
stephenhinchey@gov.nl.ca
P.O. Box 8700, 50 Elizabeth Avenue, St. John's A1B 4J6

From: Hinchey, Stephen
Sent: Friday, December 02, 2016 1:30 PM
To: Centrallandsoffice
Cc: Snow, Matthew; Rafuse, Heather
Subject: TRIM: Mines Branch response to Crown land application 150213 (grant)

Below is the Mines Branch response to Crown land application 150213 (grant):

Recommendation: Approval (conditional). Comments: The applied-for grant overlaps with a mineral licence that is, along with an adjacent mineral licence to the south, presently subject to a large-scale mineral exploration program carried out by Marathon Gold Corp. The present day exploration program has its roots in the discovery of the Leprechaun Pond gold occurrence in the mid-1980s located 4 km west of the Victoria River dam. The exploration program includes prospecting, diamond drilling, trenching, access trail preparation, and access road construction, and is focused on discovering and
evaluating widespread occurrences of gold mineralization located between Valentine Lake and the Victoria River. Several gold deposits have been recognized to date and a large-scale mining operation is a realistic future possibility. The applied-for grant shall not provide cause to impede or obstruct, in its vicinity, mineral exploration, mining, or road construction, nor access related to these activities. The applicant, by signing the title document, indicates that they have read and understood these comments.

Stephen Hinchey  
Land Use and Exploration Monitoring  
Mineral Lands Division, Mines Branch, Department of Natural Resources  
telephone (709) 729-5748, fax (709) 729-6782  
stephenhinchey@gov.nl.ca  
P.O. Box 8700, 50 Elizabeth Avenue, St. John's A1B 4J6
Dave,  

As discussed, please find attached the shapefile of Marathon’s mineral licences corresponding to their Valentine Lake property.

Stephen Hinchey  
Mineral Lands Division, Mines Branch, DNR

Regards,

Dave Mercer  
Land Management Specialist  
Dept. of Fisheries and Land Resources  
Crown Lands Administration Division  
Government of Newfoundland and Labrador  
P.O. Box 2222  
Gander, NL   A1V 2N9  
T: (709) 256-1407, F: (709) 256-1095  
E: davenmcker@gov.nl.ca

Thanks for getting back to me Dave!  

I am attaching a map of the Marathon licence areas. We would very much appreciate it if you could find out if any surface rights have been granted in these areas or if any surface rights applications are in process. If surface rights have been granted or applications are in process – we would appreciate receiving copies of them so that we can (i) assess their locations vis-à-vis the deposits and mine infrastructure, and (ii) understand the terms of such grants. I note that of particular concern are any granted surface rights or applications over the areas to the right of Valentine lake and along the access roads (identified by red lines) in licences 010899M, 013810M, 010943M and 017230M.

Let me know if this map works – otherwise I will go back to Marathon and see if there is another file format I could get.

Regards,
Hi Tauna,

Sorry I haven’t gotten back to you sooner. I am the right person to talk to on this matter. I was wondering if you could provide the contact person involved with the mapping at Marathon — that way I can compare the exact locations to the larger area of interest. Tell him or her GIS shape files or AutoCAD DWG drawings would work.

Regards,

Dave Mercer
Land Management Specialist

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Crown Lands Administration Division
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Dave,

Also, from the Land Use Atlas it looks as if there are only a small number of active applications and issued titles which overlap with the Marathon mineral licences. How did you arrive at 50+ active applications and 180+ issued titles?

Stephen Hinchey
Mineral Lands Division, Mines Branch, DNR

Hi Stephen,

Please see the request below from Marathon Gold. My understanding is that you (Mines) have already considered each application as they are referred to you and have provided responses that may address any potential conflict. Could you look into this and get back to me? I came up with some numbers, over 50 active applications and over 180 issued titles.

Regards,

Dave Mercer
Land Management Specialist
Dept. of Fisheries and Land Resources
Crown Lands Administration Division
Government of Newfoundland and Labrador
P.O. Box 2222
Gander, NL A1V 2N9
T: (709) 256-1407, F: (709) 256-1095
E: davemercer@gov.nl.ca

Hi Dave,

Marathon has provided me with the attached .shp and .dxl format files for the boundary of the 14 contiguous mineral licences that comprise the Valentine Lake Property. Please confirm if this works for your purposes.

Thank you,
Tauna
From: Tauna M. Staniland
Sent: Tuesday, January 30, 2018 1:40 PM
To: ‘Mercer, Dave W’<davemercer@gov.nl.ca>
Subject: RE: Marathon Gold

Thanks Dave! I have asked Marathon if they can forward what you have requested. I will be in touch asap.

Regards,
Tauna

From: Mercer, Dave W [mailto:davemercer@gov.nl.ca]
Sent: Tuesday, January 30, 2018 9:22 AM
To: Tauna M. Staniland <tstaniland@stewartmckelvey.com>
Subject: RE: Marathon Gold

Hi again Tauna,

Due to the scale of the area of interest, GIS shape files or AutoCAD DWG drawings would be preferred.

Regards,

Dave Mercer
Land Management Specialist

Dept. of Fisheries and Land Resources
Crown Lands Administration Division
Government of Newfoundland and Labrador
P.O. Box 2222
Gander, NL A1V 2N9
T: (709) 256-1407, F: (709) 256-1095
E: davemercer@gov.nl.ca

From: Tauna M. Staniland [mailto:tstaniland@stewartmckelvey.com]
Sent: Monday, January 29, 2018 6:28 PM
To: Mercer, Dave W
Subject: RE: Marathon Gold

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Let me know if this map works – otherwise I will go back to Marathon and see if there is another file format I could get.

Regards,
Tauna

Hi Tauna,

Sorry I haven’t gotten back to you sooner. I am the right person to talk to on this matter. I was wondering if you could provide the contact person involved with the mapping at Marathon – that way I can compare the exact locations to the larger area of interest. Tell him or her GIS shape files or AutoCAD DWG drawings would work.

Regards,

Dave Mercer
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Dave,

Correct: we review each application (provided that it was referred to us) and provide a response to address any potential conflict. While I cannot speak to Crown Lands process for determining whether to refer Mines on an application, we review and respond to whatever we are sent and it looks to me from the Land Use Atlas that we have reviewed those applications submitted over the past few years located closest to the area of interest.

Sec 29 (1)(a)

Stephen Hinchey
Mineral Lands Division, Mines Branch, DNR

Hi Stephen,

Please see the request below from Marathon Gold. My understanding is that you (Mines) have already considered each application as they are referred to you and have provided responses that may address any potential conflict. Could you look into this and get back to me? I came up with some numbers, over 50 active applications and over 180 issued titles.

Regards,

Dave Mercer
Land Management Specialist

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tauna
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Tauna

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Regards,

Dave Mercer  
Land Management Specialist

Dept. of Fisheries and Land Resources  
Crown Lands Administration Division  
Government of Newfoundland and Labrador  
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Gander, NL  A1V 2N9  
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E: davemercer@gov.nl.ca

From: Tauna M. Staniland [mailto:tstaniland@stewartmckelvey.com]  
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Tauna

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Subject: Marathon Gold

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Regards,

Dave Mercer
Land Management Specialist

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Dave: Can we review these areas for any issued titles or applications.

Thanks,

Rodger

Hi Rodger,

I am legal counsel for Marathon Gold Corporation which holds a number of mineral licences in the Valentine Lake Area. Marathon’s gold exploration project has been very successful in identifying a number of high-grade gold deposits and Marathon is in the process of undertaking a pre-feasibility study, which among other things will set out the location of mine infrastructure (such as primary crushing facilities, stock piles, heap leach pads and tailings storage) supporting the mining of gold deposits.

However, it is still not clear to Marathon if any surface rights have already been granted over the licence areas or if any applications are in process (and already passed the DNR approval stage). As result, we are seeking clarification on what surface rights exist in these areas.

I am attaching a map of the Marathon licence areas. We would very much appreciate it if you could find out if any surface rights have been granted in these areas or if any surface rights applications are in process. If surface rights have been granted or applications are in process — we would appreciate receiving copies of them so that we can (i) assess their locations vis-à-vis the deposits and mine infrastructure, and (ii) understand the terms of such grants. I note that of particular concern are any granted surface rights or applications over the areas to the right of Valentine lake and along the access roads (identified by red lines) in licences 010899M, 013810M, 010943M and 017230M.

Thanks very much for your assistance with this! Please feel free to call me if you would like to discuss.
Thank you,
Tauna

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Hi Rodger,

I am legal counsel for Marathon Gold Corporation which holds a number of mineral licences in the Valentine Lake Area. Marathon's gold exploration project has been very successful in identifying a number of high grade gold deposits and Marathon is in the process of undertaking a pre-feasibility study, which among other things will set out the location of mine infrastructure (such as primary crushing facilities, stock piles, heap leach pads and tailings storage) supporting the mining of gold deposits.

However, it is still not clear to Marathon if any surface rights have already been granted over the licence areas or if any applications are in process (and already passed the DNR approval stage). As result, we are seeking clarification on what surface rights exist in these areas.

I am attaching a map of the Marathon licence areas. We would very much appreciate it if you could find out if any surface rights have been granted in these areas or if any surface rights applications are in process. If surface rights have been granted or applications are in process – we would appreciate receiving copies of them so that we can (i) assess their locations vis-à-vis the deposits and mine infrastructure, and (ii) understand the terms of such grants. I note that of particular concern are any granted surface rights or applications over the areas to the right of Valentine lake and along the access roads (identified by red lines) in licences 010899M, 013810M, 010943M and 017230M.

Thanks very much for your assistance with this! Please feel free to call me if you would like to discuss.

Thank you,
Tauna
Dear Rodger,

I just tried to contact you by phone but understand that you were in a meeting and I advised that I would send you an email with the details of my inquiry.

I note that I act as legal counsel to Marathon Gold Corporation and that you have been assisting them with the acquisition of a permission for access roads/gates. I can confirm that, given the successful exploration on the mineral licences areas to date, the permission is vital to ensuring the continued success of the project and they were pleased to have received the permission and for your assistance to date.

Upon review of the permission, there are two issues which we have identified which we would like to further discuss with you as they do cause some concern for Marathon, as follows:
I look forward to speaking with you at your earliest convenience.

Thank you and regards,
Tauna

Tauna M. Staniland
Partner
stewartmckelvey.com/StJohns
D: 709 570.8842
tstaniland@stewartmckelvey.com

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FEB 20, 2017

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

Dear Sir/Madam:

RE: APPLICATION NO: 150214
TYPE: Permission Letter
PURPOSE: Access Roads
LOCATION: Valentine Lake Area

Permission to Construct access roads on Crown lands as shown on Schedule A attached is hereby given subject always to the following conditions:

1. This Permission is issued to the Permission Holder on an exclusive use basis for the areas where new construction has occurred which permits six gates at the locations indicated on the attached Schedule "A" and non-exclusive use for pre-existing access routes as outlined on the attached Schedule "A" until such time that mineral exploration and/or mining operations cease. This condition may be revoked or amended at the discretion of the Minister of Municipal Affairs upon reasonable notice to the Permission Holder.

2. The Permission Holder shall be solely responsible for; the erection and maintenance of all safety signage, public notification of the existence of all structures that may impede access, and ensuring that all such signage and structures are constructed to a standard that shall not present a risk to the health and safety of the general public.

3. This present Permission may be amended at the sole discretion of the Minister upon application of the Permission Holder and subject to those terms and conditions as the Minister may prescribe.

4. This Permission does not permit you to enter upon private land or to dispute claims to land.

5. This Permission does not guarantee that all lands identified are Crown lands. It is your responsibility to obtain permission from any private land owners.
6. The area of Crown lands to be occupied must not exceed 15.84 hectares with a width not to exceed 5 metres and a length not to exceed 31,680 metres, as shown on the attached supplemental mapping.

7. This Permission does not waive the required consent of, or permission from, any other Government Departments and Agencies.

8. All waste materials generated from the use of the subject land must be removed and disposed of as outlined under Conditions (Waste) attached from Service NL (Government Service Centre).

9. Any construction located within the 15 metre wide reservation of any water body must have prior approval from Fisheries Oceans Canada and the Water Resources Management Division of the Department of Environment and Climate Change.

10. All costs associated with the construction, maintenance and repair of the access road, whenever incurred, shall remain the sole responsibility of Marathon Gold Corporation.

11. The subject land shall be held under and subject to all regulations and provisions of the Lands Act and to such statutes and regulations as are now in force or which may at anytime hereafter be made by law for lands within the Province of Newfoundland and Labrador;

12. The Minister of Municipal Affairs has the right to cancel this Permission for any reason by giving a sixty (60) day notice at which time the subject land must be vacated. The Crown will accept no liability for improvements carried out on the subject land if this Permission is cancelled.

13. You must contact the nearest Forestry Office concerning the cutting or clearing of any timber from the subject land.

14. You shall indemnify and save harmless the Crown against any loss, cost or damage resulting directly or indirectly from the use or occupation of the subject land.

15. Marathon Gold Corporation ("Marathon") shall be liable for injury or loss to person or property which results from Marathon's fault, negligence or act or omission by fault or negligence, or an act or omission by fault or negligence by Marathon's employees, subcontractors, agents or assigns, in the performance or non-performance of any of their or Marathon's obligations respecting the exploration operations and specifically the erection of any gates (exclusive use only roads) placed by Marathon on or near the exploration operations.
16. This Permission does not convey the right to extract any minerals including limestone, granite, slate, marble, gypsum, marl, clay, gravel, peat, coal, naturally occurring gas or petroleum, or salt from or under the subject land.

17. The access roads shall be all weather gravel roads.

18. This Permission for the construction of access roads is subject to the conditions as defined in Environmental Assessment Registration number 1839 on file with the Environmental Assessment Division of the Department of Environment and Climate Change which was released in July, 2016 and conditions stipulated within this application's approval notice. Rehabilitation of roads is required when operations cease in accordance with a Decommissioning Strategy approved by the Minister of Environment and Climate Change, as stated in Environmental Assessment Registration #1839.

19. This Permission shall not come into effect until both copies of this Permission have been signed by MARATHON GOLD CORPORATION in the space provided, and a copy returned to MARATHON GOLD CORPORATION from the Crown Lands Administration Division.

REGIONAL LANDS MANAGER

Agreement of MARATHON GOLD CORPORATION:

MARATHON GOLD CORPORATION hereby accepts all of the terms and conditions of this Permission to Construct on Crown lands dated February 20, 2017.

MARATHON GOLD CORPORATION

DATE

Attachments

SEE ATTACHED CONDITION(S)

cc: GSC/Corner Brook
Wildlife Division
Tourism & Culture Branch
Forestry Services Branch (Springdale/St. George's)
Mineral Lands Division
Service NL (Occupational Health & Safety)

Fraser Mill, P.O. Box 2222, Gander, NL A1V 2N9, Telephone (709) 256 - 1400, Facsimile (709) 256 - 1095
CONDITION(S)

SERVICE NL (GOVERNMENT SERVICE CENTRE)

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

Environmental Protection:

1. The extent of land clearing and grubbing should be restricted such that naturally vegetated buffers between the site and surrounding properties and thoroughfares are maintained.

2. Any existing tree screen concealing the operation from public view is to be maintained.

3. Access to the site must be approved by Department of Transportation and Works.

4. 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 Service NL and/or the Department of Environment and Climate Change.

Waste:

1. All waste material shall be considered, prior to disposal, for reuse, resale or recycling.

2. All waste material generated during the construction and operation of the facility is to be placed in suitable refuse containers and removed to an approved waste disposal site on a weekly basis, with the approval of Service NL and the site owner/operator.

3. Derelict vehicles, scrapped equipment and other debris are not to be stored on site. Such material is to be removed to an approved waste disposal site or scrap yard on a regular basis, with the approval of the site owner/operator.

4. The site is to be kept neat and tidy at all times.

5. Any cut brush should be chopped/shredded, and may be burnt on-site with the approval of the Forestry and Agrifoods Agency or removed to an approved waste disposal site with the permission of the owner/operator of the waste disposal site.

6. Tires and used or waste oil is not to be used to aid in the burning of brush.
Gasoline and Associated Products

1. All fuel storage tank systems, other than those connected to a heating appliance of capacity of 2,500 litres or less, and any proposed fuel cache will require approval by Service NL prior to installation.

2. Storage of Used Oil must be in compliance with the Used Oil Control Regulations.

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 cleanup 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 Environmental Emergencies Line at 772-2083 or 1-800-563-9089.

DEPARTMENT OF ENVIRONMENT AND CLIMATE CHANGE – WILDLIFE DIVISION

The Wildlife Division advises applicant to operate under established regulations and guidelines with respect to wildlife and their habitats (e.g. nesting birds, caribou, waterfowl, wetlands, inland fish, rare plants, riparian species) to minimize adverse impacts (Section 106 of the Wild Life Regulations under the Wild Life Act (O.C. 96-809)).

The proposed work falls within the current 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”.

The denning period for marten occurs from early April to the end of June. Disturbance to dens could result in negative impacts on survival or condition of young or denning females (Marten Recovery Plan). To help reduce any negative impacts on wildlife species, including marten, the Wildlife Division recommends that vegetation clearing or excessive noise be undertaken outside of the nesting, breeding and brood rearing period, which runs from early-April to mid-July.
Activities, disturbance and habitat destruction must be minimized as much as possible in order to avoid causing harm to individuals or degrading important marten habitat. Ground personnel are reminded to travel with caution within the area at all times.

Access Roads/trails must be revegetated once abandoned.

The proposed takes part within a designated waterfowl area. The Wildlife Division recommends that a minimum 50 m naturally vegetated buffer be maintained along all waterbodies and wetlands to protect sensitive riparian and aquatic species, and their habitat.

DEPARTMENT OF BUSINESS, TOURISM, CULTURE AND RURAL DEVELOPMENT
- TOURISM AND CULTURE BRANCH

- Tourism and Culture has concerns with the development of new access roads in areas used by outfitting businesses. It is recommended the proponent develop a decommissioning strategy for the proposed access roads once development has concluded. This was agreed to by the proponent in Environmental Assessment Reg. 1839. Increased access into areas used by the outfitting industry results in crowding in angler and hunting experiences and negatively affects population of habitat and success rates.

There are four outfitters in this area that the proponent must contact to mitigate conflict regarding the mineral exploration and access road developments in the area of Valentine Lake.

1. [Redacted] 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: [Redacted], Website: www.victoriaoutfitters.com

2. [Redacted] of Kinden's Quinn Lake Outfitters Ltd. (Quinn Lake Lodge), P.O. Box 787, 46 Centennial Drive, Lewisporte, NL, A0G 3A0, Tel: 709-535-8811/541-1340/1353, Fax: 709-535-1927, Email: info@kindensoutfitters.com, Website: www.kindensoutfitters.com

3. [Redacted] of Notch Mountain Outfitters Inc. (Valentine Lake Lodge), P.O. Box 462, Buchans, NL, A0H 1G0, Tel: 709-672-3589/8607, Fax: 709-672-3843, Email: [Redacted], Website: www.notchmountainoutfitters.com

4. [Redacted] of Caribou Cove Outfitters Ltd. (Moose Lodge), 468 Rocky Lake Drive, Bedford, NS, B4A 2T6, Tel: 902-209-0099, Fax: 902-455-0775, Email: fivestar@fivestarroofing.ns.ca, Website: www.foxharbouroutfitters.ca
FORESTRY SERVICES BRANCH

Gates will not be an impediment to future commercial timber harvesting operations.

The Newfoundland and Labrador Forest Services will be provided keys or codes to the gates so that we have access for fire protection and inspection purposes.

DEPARTMENT OF NATURAL RESOURCES – MINES BRANCH

The Mines Branch – in its mandate to facilitate the exercise of mineral rights, including the carrying out of mineral exploration upon mineral licences – supports the presence of gates because without them members of the public would have unrestricted access to exploration work sites where heavy machinery is operating and where ground is being excavated, whereas the presence of gates will go a long ways toward ensuring that exploration work can proceed without interruption due to the unexpected arrival and presence of people and vehicles unrelated to the operation. The gates need to be highly visible and, for newly constructed or refurbished side roads, placed at the entrance to the side roads.

The applied-for permission is for the purpose of constructing access roads in support of a large, ongoing mineral exploration program carried out by Marathon Gold Corp. If the permission is to have a term of duration or be accompanied by the issuance of a licence to occupy then the following shall apply:

The Mines Branch requires that, with regard to duration and transferability, the licence (or permission) to occupy be considered attached to the mineral licences with which it overlaps (licences 10899M and 10943M held by Marathon Gold Corp.). Specifically, the licence (or permission) to occupy must contain conditions in the title document to the effect of the following:

1. Should mineral licence 10899M or 10943M or one of their descendants* overlapping with a portion of the licence to occupy be transferred, that portion of the licence to occupy shall be transferred with it.

2. Should a portion of mineral licence 10899M or 10943M or one of their descendants overlapping with a portion of the licence to occupy be surrendered, then that portion of the licence to occupy shall be extinguished.

3. Should mineral licence 10899M or 10943M or one of their descendants overlapping with a portion of the licence to occupy be cancelled or expire, then that portion of the licence to occupy shall be extinguished.
'Descendant' refers to a mineral licence resulting from an original mineral licence being split, grouped, or partially surrendered. Descendant licences have new and unique licence numbers.

**SERVICE NL – OCCUPATIONAL HEALTH AND SAFETY**

All work is to be conducted in accordance the Occupational Health and Safety Act and its Regulations. The development of all roads shall be in accordance with said regulations. The gates shall be properly delineated/marked and appropriate signage shall be installed warning the public of the gate and of potential workers who may be working in said areas.

**NOTE:** Under the Occupational Health and Safety Act, Section 4 states: An employer shall ensure, where it is reasonably practicable, the health, safety and welfare of his or her workers. Section 5, outlines more of specific duties of employers and their responsibility. Under the Occupational Health and Safety Regulations (2012) – Section 654 (protection of workings, pits and quarries) states: An employer shall ensure that a surface mine working or open face is securely fenced or otherwise protected against inadvertent entry by persons where: (a) the working constitutes a hazard by reason of its depth; (b) the approaches to and openings of the workings are not readily visible; or (c) the hazard caused by the workings is greater than the hazard caused by natural topographical features within 600 metres of the workings.

It is the employers duty – Marathon Gold Corporation to protect workers from potential hazards that they may face and to protect the public from any hazards created by them because of their work activity.
Hi Rodger, Herb and Dave,

I am checking to see if there is any further information at this point. My clients are quite anxious to get some certainty with where things stand and they are concerned that applications might slip through in the interim period. Is there any possibility of a call tomorrow to discuss? I am out of the office on Friday but would like to be able to provide them with an update asap if possible.

Thank you,
Tauna

---

Good Day Tauna,

Just to provide an update, we are currently reviewing this matter and hope to be in a position to respond to your inquiry soon.

Regards,

Rodger

Rodger Primmer
Regional Lands Manager

Department of Fisheries and Land Resources
Crown Lands Administration Division
Government of Newfoundland & Labrador
P.O. Box 2222, Gander, NL Canada A1V 2N9
Good morning Rodger, Dave and Herb,

I haven't had a response to the below message and am wondering if we can set up a time to have a call to discuss. My clients are quite concerned with the applications that are in process on the mineral licence areas and they would like to get an understanding of the status of these applications and next steps.

Please let me know if there is a date and time that works for a call.

Thank you,
Tauna

---

From: Tauna M. Staniland
Sent: Tuesday, February 06, 2018 2:30 PM
To: 'rprimer@gov.nl.ca' <rprimer@gov.nl.ca>; 'Mercer, Dave W' <davemercer@gov.nl.ca>; 'Edwards, Herb' <herbedwards@gov.nl.ca>
Subject: FW: Surface Rights - Valentine Lake Area

Good afternoon Rodger, Dave and Herb,

Further to my correspondence below I confirm that we have received information from Dave on both issued surface rights and applications for surface rights over the areas of the Marathon Gold mineral licences. On a very positive note it appears that there have not been any recent surface rights issued other than those issued to Marathon Gold. However, it does appear that there are seven applications in process and that a number of these applications are in and around areas that are of critical importance to Marathon (including on the site of planned infrastructure and within the blast radius from identified gold deposits). As a result, Marathon would like to get a sense of where these applications stand and to get some assurances that these applications will not be granted at this time.

Please let us know what the best way to move forward on this issue is. If it would be helpful, we would propose to arrange for a meeting directly between Marathon and an appropriate representatives of Crown Lands so that Marathon can give you a current overview of the project (infrastructure and deposits) and you can get a sense of why the applied for surface rights will be problematic.
We very much appreciate your assistance on this and we look forward to discussing with you further.

Regards,
Tauna

From: Tauna M. Staniland  
Sent: Tuesday, January 23, 2018 10:53 AM  
To: rprimer@gov.nl.ca  
Cc: Edwards, Herb <herbedwards@gov.nl.ca>  
Subject: Surface Rights - Valentine Lake Area

Hi Rodger,

I am legal counsel for Marathon Gold Corporation which holds a number of mineral licences in the Valentine Lake Area. Marathon’s gold exploration project has been very successful in identifying a number of high grade gold deposits and Marathon is in the process of undertaking a pre-feasibility study, which among other things will set out the location of mine infrastructure (such as primary crushing facilities, stock piles, heap leach pads and tailings storage) supporting the mining of gold deposits.

However, it is still not clear to Marathon if any surface rights have already been granted over the licence areas or if any applications are in process (and already passed the DNR approval stage). As result, we are seeking clarification on what surface rights exist in these areas.

I am attaching a map of the Marathon licence areas. We would very much appreciate it if you could find out if any surface rights have been granted in these areas or if any surface rights applications are in process. If surface rights have been granted or applications are in process – we would appreciate receiving copies of them so that we can (i) assess their locations vis-à-vis the deposits and mine infrastructure, and (ii) understand the terms of such grants. I note that of particular concern are any granted surface rights or applications over the areas to the right of Valentine lake and along the access roads (identified by red lines) in licences 010899M, 013810M, 010943M and 017230M.

Thanks very much for your assistance with this! Please feel free to call me if you would like to discuss.

Thank you,
Tauna
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Dear Mr. Primmer,

As you are aware, Marathon Gold is advancing a major gold mining project on its Valentine Lake property. I am bringing to your attention in the accompanying letter and issue that needs to be addressed by your department. The letter describes the issue and I look forward to your response.

Sincerely,
Phillip

Phillip C. Walford, P.Geo.
President and CEO
Marathon Gold Corp.
10 King St. East, Suite 501
Toronto, Ontario M5C 1C3
Tel: 416.987.0711
Mob: [REDACTED]
Fax: 416.861.1925
Dear Mr. Primmer,

The attached letter expresses an issue that needs to be addressed as we move our project forward. The project continues to grow in size however the usable land we have for the project is limited. The cabin referenced is where infrastructure must go.

Sincerely,

Phillip

---

Phil Walford, P.Geo.
President and CEO
Marathon Gold Corp.
10 King St. East, Suite 501
Toronto, Ontario M5C 1C3
Tel: 416.987.0711
Mob: [REDACTED]
Fax: 416.881.1925
Dear Mr. Primmer,

I know that you are a busy person. I would like to draw to your attention the issue of the status of [redacted] cabin. We are planning our 2019 program that is focused on completing a Preliminary Feasibility Study by the end of the 3rd quarter of 2019. This study is being built on the successful PEA announced October 30, 2019 that demonstrates a large and robust mining operation is highly likely. The map provided is still current and clearly shows that the cabin is very close to the planned infrastructure. The location of the infrastructure is tentative and can easily shift with the results of geotechnical testing that we will commence in 2019 but the amount of shifting is limited by topography. There are a variety of testing methods that may have to be employed to determine the overburden and rock characteristics for civil engineering involved in foundation work and other infrastructure. The area around the [redacted] cabin has a high likelihood of being tested so it is important for Marathon Gold to know the status of this cabin as we make our plans for 2019. If the cabin is not legal, it would be preferable to have it removed before we commence our testing.

Sec 40(1)

Regards,

Phillip

Phillip C. Walford, P.Geo.
President and CEO
Marathon Gold Corporation
10 King Street East, Suite 501
Toronto, Ontario, M5C 1C3
Tel: +1.416.987.0711
Cel: +1.647.884.6554
Fax: +1.416.861.1925

---

Dear Mr. Primmer,
The attached letter expresses an issue that needs to be addressed as we move our project forward. The project continues to grow in size however the usable land we have for the project is limited. The cabin referenced is where infrastructure must go.

Sincerely,
Phillip

Phillip C. Walford, P.Geo.
President and CEO
Marathon Gold Corp.
10 King St. East, Suite 501
Toronto, Ontario M5C 1C3
Tel: 416.887.0711
Mob: [REDACTED]
Fax: 416.881.1925
Dear Mr. Walford:

Thank you for your correspondence of October 18, 2018. An initial review of our records indicates we have not received an application from an [REDACTED] for Crown title to a cabin lot in the subject area identified. We will commence an investigation to determine the status of this occupation and provide an update in due course.

Sincerely,

Rodger Primmer

Newfoundland
Labrador

Rodger Primmer
Regional Lands Manager

Department of Fisheries and Land Resources
Crown Lands Administration Division
Government of Newfoundland & Labrador
P.O. Box 2222, Gander, NL Canada A1V 2N9

709-256-1235 (T) | rprimmer@gov.nl.ca

From: Phil Walford [mailto:pwalford@marathon-gold.com]
Sent: Thursday, October 18, 2018 3:09 PM
To: Primmer, Rodger
Cc: Edwards, Herb; tstaniland@stewartmckelvey.com
Subject: Marathon - Letter to Crown Lands

Dear Mr. Primmer,

The attached letter expresses an issue that needs to be addressed as we move our project forward. The project continues to grow in size however the usable land we have for the project is limited. The cabin referenced is where infrastructure must go.

Sincerely,

Phillip

Phillip C. Walford, P.Geo.
President and CEO
Marathon Gold Corp.
Strowbridge, Kerry

Morgan, Tara

Thursday, January 18, 2018 1:58 PM

Bannister, Jeff

FW: URGENT - REVISED Mines Branch response to Crown land application 150213

Thanks

Tara

Tara Morgan
Director (A), Crown Lands Division
Department of Fisheries and Land Resources

Tel: (709) 637-2093 Fax: (709) 637-2004

From: Hinchey, Stephen
Sent: Thursday, January 18, 2018 1:18 PM
To: Centrallandsoffice <Centrallandsoffice@gov.nl.ca>; Grandy, Jonathan <JonathanGrandy@gov.nl.ca>; Morgan, Tara <taramorgan@gov.nl.ca>
Cc: Canning, Perry <PerryCanning@gov.nl.ca>; Sheppard, Kevin <KevinSheppard@gov.nl.ca>; Rafuse, Heather <HeatherRafuse@gov.nl.ca>; Snow, Matthew <MatthewSnow@gov.nl.ca>; Morrissey, Damien <dmorrissey@gov.nl.ca>

Subject: URGENT - REVISED Mines Branch response to Crown land application 150213

Below is the REVISED Mines Branch response to Crown land application 150213:

Recommendation:

Comments:

This response replaces the previous Mines Branch response submitted December 2, 2016.

Please acknowledge receipt of our response. If you have any questions, please do not hesitate to contact me.

Stephen Hinchey
Land Use and Exploration Monitoring
Mineral Lands Division, Mines Branch, Department of Natural Resources
telephone (709) 729-5748, fax (709) 729-6762
stephenhinchey@gov.nl.ca
P.O. Box 8700, 50 Elizabeth Avenue, St. John's A1B 4J6
From: Hinchey, Stephen  
Sent: Friday, December 02, 2016 1:30 PM  
To: Centrallandoffice  
Cc: Snow, Matthew; Rafuse, Heather  
Subject: TRIM: Mines Branch response to Crown land application 150213 (grant):  

Below is the Mines Branch response to Crown land application 150213 (grant):  

Recommendation: Approval (conditional). Comments: The applied-for grant overlaps with a mineral licence that is, along with an adjacent mineral licence to the south, presently subject to a large-scale mineral exploration program carried out by Marathon Gold Corp. The present day exploration program has its roots in the discovery of the Leprechaun Pond gold occurrence in the mid-1980s located 4 km west of the Victoria River dam. The exploration program includes prospecting, diamond drilling, trenching, access trail preparation, and access road construction, and is focused on discovering and evaluating widespread occurrences of gold mineralization located between Valentine Lake and the Victoria River. Several gold deposits have been recognized to date and a large-scale mining operation is a realistic future possibility. The applied-for grant shall not provide cause to impede or obstruct, in its vicinity, mineral exploration, mining, or road construction, nor access related to these activities. The applicant, by signing the title document, indicates that they have read and understood these comments.

Stephen Hinchey  
Land Use and Exploration Monitoring  
Mineral Lands Division, Mines Branch, Department of Natural Resources  
telephone (709) 729-5748, fax (709) 729-6782  
stephenhinchey@gov.nl.ca  
P.O. Box 8700, 50 Elizabeth Avenue, St. John's A1B 4J6
Good morning Keith.

We would like to discuss this issue with you. I have attached Marathon's draft site plan for your perusal. Anne will be following up with your office to book time.

Many thanks,

Perry
Potential copyright material

If you wish to obtain a copy please contact the ATIPP Office at (709) 729-7072 or atippoffice@gov.nl.ca.
FYI. Do we know where the reservoir area is that is referred to for launching boats?

Rodger

---

From: Sherry Dunsworth
Sent: Wednesday, March 22, 2017 4:46 PM
To: Primmer, Rodger
Cc: Tauna M. Staniland; Phil Walford; Moore, Darren E.; Deering, Keith; Canning, Perry; Edwards, Herb
Subject: Re: Application # 150214 - Valentine Lake area

Hello Mr. Primmer,

Marathon Gold Corporation's solicitor has reviewed the wording of the specific conditions discussed between solicitors and she is in agreement with the revised wording.

Regards,
Sherry

On Wed, Mar 15, 2017 at 2:54 PM, Primmer, Rodger <rprimmer@gov.nl.ca> wrote:

Good Day Ms. Dunsworth,

In response to your email of March 9, 2017, please find attached a revised permission letter which includes revised wording to some conditions as discussed between your solicitor and our solicitor with the Dept. of Justice and Public Safety.

Once you and your solicitor have reviewed the revised letter attached, please advise if you have any concerns or additional suggestions. If there are no further concerns or suggestions, I will arrange to have the original in duplicate forwarded for signing and return to our office.

Regards,

Rodger

Rodger Primmer
Regional Lands Manager
Rodger,

We think that it might be helpful if we could meet with you to discuss the gates and ensure that we are all on the same page with respect to their location. In particular, we would like to ensure that you are aware of why the gates we propose are needed and it would be helpful for us to understand if Crown lands has specific concerns with respect to the proposed locations. Phillip Walford, the President of Marathon, is in town in the last week of March. Is it possible to arrange a meeting between you, Phillip
and I

I would not imagine we would need legal counsel involved in this meeting; however, let me know if you think that is required.

Regards,

Sherry

---------- Forwarded message ----------
From: Primmer, Rodger <primmer@gov.nl.ca>
Date: Wed, Mar 8, 2017 at 2:12 PM
Subject: RE: Application # 150214 - Valentine Lake area
To: Sherry Dunsworth <reddyreddy@gmail.com>
Cc: "Edwards, Herb" <herbedwards@gov.nl.ca>, "Tauna M. Staniland (tstaniland@stewartmckelvey.com)" <tstaniland@stewartmckelvey.com>, "Moore, Darren E." <dmoore@gov.nl.ca>, "Deering, Keith" <keithdeering@gov.nl.ca>, "Canning, Perry" <PerryCanning@gov.nl.ca>

Dear Ms. Dunsworth:

Thank you for your email of February 24, 2017. When our staff visited the area on January 12, 2017, we did note the existence of an extra gate that was not identified in your Crown land application. I have identified the specific gate on the attached Schedule “A” and Schedule “A3”. If it is the case that this gate has been removed since our visit on January 12, 2017, can you please confirm.

Concerning the main gate you identified as # 6, this gate was not identified in the permission letter since approval was not provided for the placement of a gate on the main access road. Condition # 1 of the Permission Letter referenced “non-exclusive use for pre-existing access routes as outlined on the attached Schedule “A”. The main access road was identified on the Schedule “A” as non-exclusive use. I trust this provides clarification.

Regards,

Rodger
Dear Mr. Primmer,

From: Sherry Dunsworth [mailto:**********@gmail.com]
Sent: Friday, February 24, 2017 3:14 PM
To: Primmer, Rodger
Cc: Canning, Perry; Grace, Tony
Subject: Re: Application # 150214 - Valentine Lake area

Sec 40(1)
I have discussed the gate permitting with our lawyer, Tauna Staniland of Stewart McKelvey law firm. During the discussions, I noticed that in the scanned permit you sent to me for signing (application #150214), there is an error regarding the location of the 6 gates to be permitted. An extra gate that no longer exists, and was not in our original application (see attached), is included in the scan you sent while the main Gate #6 in our application is not in this permit. The UTM coordinates for all 6 gates are in the original application (NAD 83, Zone 21) (see attachments).

I will wait for the revised permit with the corrected gate locations as well as the revised wording as suggested by our lawyer, Tauna Staniland.

Regards, Sherry

On Mon, Feb 20, 2017 at 12:31 PM, Primmer, Rodger <rprimer@gov.nl.ca> wrote:

Good Day Ms. Dunsworth,

Attached in duplicate is the approval letter for application # 150214. The originals will follow by mail. Once you receive the originals, please have them both signed and dated in the appropriate spaces on page 3 of the letter and both returned to this office.

Regards,

Rodger

Newfoundland Labrador

Rodger Primmer
Regional Lands Manager
Sherry Dunsworth, M.Sc., P.Geo.

SVP Exploration

Marathon Gold Corporation

P.O. Box 160,

Pasadena, NL, A0L 1K0

Tel: 1.709.686.0153

Cell: [redacted] [Sec 40(1)]

Fax: 1.709.686.2317 [Sec 40(1)]

[redacted]@gmail.com

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---

Department of Municipal Affairs

Crown Lands Administration Division

Government of Newfoundland & Labrador

P.O. Box 2222, Gander, NL Canada A1V 2N9

709-256-1400 (T) | rprimmer@gov.nl.ca
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--

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

Tel: 1.709.686.0153
Cell: 1.
Fax: 1.709.686.2317
[redacted]@gmail.com

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--

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

Tel: 1.709.686.0153
Cell: 1.
Fax: 1.709.686.2317
[redacted]@gmail.com
Good Day Ms. Dunsworth,

Would you be able to give me a call at 256-1400. I tried calling you but was unable to connect.

Thanks,

Rodger Primmer

Newfoundland Labrador

Rodger Primmer
Regional Lands Manager

Department of Municipal Affairs
Crown Lands Administration Division
Government of Newfoundland & Labrador
P.O. Box 2322, Gander, NL Canada A1V 2N9

709-256-1400 (T) | rpu@mun.ca
called Ms. Dunsworth on Dec. 9, 2016 at 4:45 PM and left a message to call me sometime today.

called again at 5:38 PM and no answer.

E-mailed Ms. Dunsworth again at 5:40 PM.
dec. 9, 2016.

called Ms. Dunsworth on Dec. 15, 2016, 3:35 PM.

No answer.

called Ms. Dunsworth on Dec. 19, 2016 9:15 AM and left a message to call me.

called and left another message to call me at 256-1400. Dec. 19, 2016 3:40 PM.

Spoke to Ms. Dunsworth at 3:40 PM.

Dec. 19, 2016
Good Day Ms. Dunsworth:

I write as a follow up to our conversation of December 19, 2016 concerning the gates Marathon Gold Corporation has in place on access roads in the Valentine Lake area. As I stated in our conversation, The Department of Municipal Affairs, Lands Branch requires the 6 gates to be opened right away so access on these roads is no longer restricted. We also require the gates to be removed from Crown lands and will be providing additional written notification on the removal requirement in accordance with the Lands Act.

Sincerely,

Rodger Primmer

Newfoundland Labrador

Rodger Primmer
Regional Lands Manager

Department of Municipal Affairs
Crown Lands Administration Division
Government of Newfoundland & Labrador
P.O. Box 2222, Gander, NL, Canada A1V 2N9

709-255-1400 (T) | primmer@nov.nl.ca
Marathon Gold Corporation
P.O. Box 160
Newfoundland, NL A0L 1K0

Attention: Ms. Sherry Dunsworth

REMOVAL NOTICE
the Lands Act, SNL 1991 c36

According to the records of the Crown Lands Administration Division of the Department of Municipal Affairs, a Crown title has not been issued to the lands on which you have SIX GATES located at or near Valentine Lake area in the Province of Newfoundland and Labrador.

You are hereby ordered pursuant to subsection 32(1) of the Act, to remove these structures from Crown land and restore the sites to a condition satisfactory to the Minister within 30 (thirty) days from the date of posting or service of this notice. Your failure to do so may result in this Department removing or demolishing the said structures pursuant to subsection 32(6) and the costs and expenses of that removal or demolition may be recovered from you as a debt due to the Crown pursuant to subsection 32(7).

A person upon whom a Removal Notice under subsection 32(1) has been served who fails to remove, demolish or otherwise dispose of the structures or restore the Crown lands to a condition satisfactory to the Minister within 30 days of service of the Removal Notice is liable on summary conviction to a penalty of $25 for each day that the structures remain on Crown lands.

Regional Lands Manager

DATE: December 21, 2016

cc: Land Management Officer
Mercer, Dave W

From: Meaney, Milly
Sent: Friday, February 17, 2017 9:10 AM
To: Mercer, Dave W
Subject: Re: Call me?

I'll call after my meeting. Do not do anything on this file today.

Milly Meaney
Director, Crown Lands Administration
Department of Municipal Affairs
87-113 Higgins Line
Howley Building
St. John's, NL A1B 4J6

t: 709-729-3174
f: 709-729-4361

millymeaney@gov.nl.ca

Sent from my BlackBerry 10 smartphone on the Bell network.

From: Mercer, Dave W
Sent: Friday, February 17, 2017 9:01 AM
To: Meaney, Milly
Subject: Call me?

Hi Milly,

I left a message with Roxane - I don't have your direct number. I was wondering if we could discuss the Marathon Gold file for a few minutes. My number is 256-1407.

Regards,

Dave Mercer
Land Management Specialist

Dept. of Municipal Affairs
Crown Lands Administration Division
Government of Newfoundland and Labrador
P.O. Box 2222
Gander, NL A1V 2N9
T: (709) 256-1407, F: (709) 256-1095
E: davermercer@gov.nl.ca
Took #5 out
Dear Ms. Dunsworth:

I write in response to your inquiry of January 20, 2017 regarding the Removal Notice forwarded to you from the Lands Branch, Department of Municipal Affairs dated December 21, 2016 concerning six gates located on Crown lands in the Valentine Lake area. That Removal Notice required Marathon Gold Corporation to remove these structures from Crown lands and restore the sites to a condition satisfactory to the Minister of Municipal Affairs within 30 (thirty) days (i.e. by end of day January 20, 2017). On December 20, 2016 you were also notified by email from Mr. Rodger Primmer, Regional Lands Manager to have the gates opened right away. According to our information these requests have not been complied with and the gates remain closed and in place.

Based on our conversation on January 20, 2017 the Department and Marathon Gold Corporation agree as follows:

1) Gate #6 on the main road is to be opened and must remain open as of January 20, 2017.
2) The Removal Notice dated December 21, 2016 has been extended as per section 32(8) of the Lands Act for an additional 30 days.
3) Marathon Gold Corporation will also place appropriate signage indicating the presence of gated roads and active mineral exploration.
4) Marathon Gold Corporation agrees to accept all legal liability that may arise as a result of any incident causing damage or personal injury in any way related to mineral exploration operations in the area. Marathon Gold Corporation further agrees to indemnify and hold harmless the Province of Newfoundland and Labrador from any liability arising from any such claims.

Sincerely,

Rodger Primmer
Regional Lands Manager, Lands Branch
Dear Dave,

We will need to put a check in plan in place, ensure satellite phone is working. Also to make contact after working hours.

Rodger

Hi Rodger,

The road into camp is well plowed and clearly marked. So your representative can easily drive the 2.5 hrs (88 km) into the property area. He/she will leave Millertown, drive along the Duck Pond road until seeing the turn off to the south which is marked as Marathon Gold Camp, then drive south down the east side of Red Indian Lake until hitting a T intersection called Roebucks (about 55 km). He/she will then turn left and drive until seeing 2 large signs on each side of the road stating "Caution - Men Working Next 20 KM". This marks the start of our exploration property and Scott will meet your representative at this location.

Scott is in camp and your representative can call into the camp from Millertown (ALSO _FILL UP YOUR TRUCK AT MILLERTOWN - C & S Gas Bar is on the road_) and then Scott will know when to drive out to meet the person at the beginning of our property (i.e.: at the 2 large Caution - Men Working Next 20 KM yellow signs on either side of the road).

The number to call into camp is [redacted].

Will your person have a satellite phone with them in case they have a road incident? They can call into the camp if they need assistance. They should also have some food as well as the full tank of gas when they drive down to the site.

I have attached a general map showing the route into the Valentine Property.

Let me know if you need any other information.

Regards, Sherry

On Tue, Jan 10, 2017 at 3:26 PM, Primmer, Rodger <rprimmer@gov.nl.ca> wrote:
Thanks Sherry,

Thursday January 12th seems to be workable for us. If possible, would [redacted] be able to meet our staff at Millertown? If you could provide [redacted] phone number we will make contact with him to finalize arrangements.

Thanks,

Rodger

---

From: Sherry Dunsworth [mailto:[redacted]@gmail.com]
Sent: Tuesday, January 10, 2017 1:25 PM
To: Primmer, Rodger; Smith, Alex O.; Sheppard, Kevin
Cc: Phil Walford
Subject: Re: Crown Land Application # 150214 - Valentine Lake Area

Hello Rodger,

Yes, [redacted] Camp Manager, can meet your staff member along the road in an area close to the start of our mineral exploration licence property.

[redacted] is available on Thursday, Jan 12 or Friday, Jan 13, 2017.

Please advise me if that timing works for your department and then we will make plans for a time and place to meet along the road.

Regards, Sherry
On Tue, Jan 10, 2017 at 11:28 AM, Primmer, Rodger <rprimer@gov.nl.ca> wrote:

Good Day Ms. Dunsworth,

We plan to have our staff visit the Valentine Lake area. Would it be possible for a company representative to meet our staff in the area to observe and discuss the locations of the gates? Are these roads accessible by vehicle now? Thank you.

Regards,

Rodger

Rodger Primmer
Regional Lands Manager

Department of Municipal Affairs
Crown Lands Administration Division
Government of Newfoundland & Labrador
P.O. Box 2222, Gander, NL Canada A1V 2N9

709-256-1400 (D) / rprimer@gov.nl.ca
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Sherry Dunsworth, M.Sc., P.Geo.
V.P. Exploration
Marathon Gold Corporation
P.O. Box 160,
Pasadena, NL, A0L 1K0
Tel: 1.709.686.0153
Cell: [redacted]
Fax: 1.709.686.2317
@<redacted>

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Sherry Dunsworth, M.Sc., P.Geo.
V.P. Exploration
Marathon Gold Corporation
P.O. Box 160,
Pasadena, NL, A0L 1K0
Tel: 1.709.686.0153
Cell: [redacted]
Fax: 1.709.686.2317
@<redacted>
Dave :

See info. below. Can we arrange for a visit there on Thursday or Friday? We have to gather the following info:

1. Confirm the roads and gates are on Crown land (GPS each location), take photographs of each.
2. Are the gates on roads that always existed or new roads they constructed? May not be same answer for all of them. If some of them are on new roads constructed, need to determine if those roads lead to anywhere other than their work sites.

Thanks,

Rodger

---

From: Sherry Dunsworth [mailto:Sherry Dunsworth@gmail.com]
Sent: Tuesday, January 10, 2017 1:25 PM
To: Primmer, Rodger; Smith, Alex O.; Sheppard, Kevin
Cc: Phil Walford
Subject: RE: Crown Land Application # 150214 - Valentine Lake Area

Hello Rodger,

Yes, [REDACTED], Camp Manager, can meet your staff member along the road in an area close to the start of our mineral exploration licence property.

This is available on Thursday, Jan 12 or Friday, Jan 13, 2017.

Please advise me if that timing works for your department and then we will make plans for a time and place to meet along the road.

Regards, Sherry

---

On Tue, Jan 10, 2017 at 11:28 AM, Primmer, Rodger <rprimer@gov.nl.ca> wrote:

Good Day Ms. Dunsworth,

We plan to have our staff visit the Valentine Lake area. Would it be possible for a company representative to meet our staff in the area to observe and discuss the locations of the gates? Are these roads accessible by vehicle now? Thank you.
Regards,

Rodger

Rodger Primner
Regional Lands Manager

Department of Municipal Affairs
Crown Lands Administration Division
Government of Newfoundland & Labrador
P.O. Box 2222, Gander, NL Canada A1V 2N9

709-256-1400 (T) | rprimner@gov.nl.ca

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Sherry Dunsworth, M.Sr., P.Geo.
V.P. Exploration
Marathon Gold Corporation
P.O.Box 160,
Pasadena, NL, A0L 1K0
From: Hearns, Peter  
Sent: Thursday, August 25, 2016 6:29 AM  
To: Moore, Darren E.  
Cc: Mercer, Dave W  
Subject: FW: Crown lands application

Darren,

Below is some rationale for gates on the Valentine Lake Mineral Exploration project. This project has been ongoing for a long time.

Dave Mercer has this information and will include it in the application when they receive it from Marathon Gold.
mentioned in the EA release, except for where we had our comments.

Peter

Peter Hearns, MES
Manager of Resource Evaluation and Policy Integration
Land Management Division, Dept. of Municipal Affairs
Email: peterhearns@gov.nl.ca | Tel: (709) 729-3231

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From: Sherry Dunsworth [mailto: sherry.dunsworth@gmail.com]
Sent: Wednesday, August 24, 2016 5:13 PM
To: Hearns, Peter
Cc: Barnes, Blair; Kavli, Darren F.; Mercer, Dave W
Subject: Fwd: Crown lands application

Hello Peter,

(see e-mail below). Blair notes the issues Marathon Gold Corporation has encountered in the past at the Valentine Lake exploration site re: illegal hunting. Blair also notes the fact that the legislation under the current Wildlife Act does not cover mining/exploration sites.

I have spoken with Darren Kavli, OHS, this morning and Darren is of the opinion that this is the right approach to protecting our workers. Under the OHS Act, Sections 4 and 5 (pertaining to duties of employer), a work supervisor is responsibility to ensure a safe working environment for his/her employees. The OHS Act states: Section 4. An employer shall ensure, where it is reasonably practicable, the health, safety and welfare of his or her workers. Likewise, the OHS Regulations - Section 654 (pertaining to protection of workings, pits and quarries) states: An employer shall ensure that a surface mine working or open face is securely fenced or otherwise protected against inadvertent entry by persons where; (a) the working constitutes a hazard by reason of its depth; (b) the approaches to and openings of the workings are not readily visible; or (c) the hazard caused by the workings is greater than the hazard caused by natural topographical features within 600 meters of the workings. Both the OHS Act and Regulations cover the need for Marathon Gold to have in place gates to protect workers from hunters penetrating the workplace and for gates/fencing to be in place where there is workings such as pits, trenches and other potential hazards.

I will proceed with submitting the Crown Lands Application for the gates (noting we have a current Temporary Work Camp licence # 138262) and trust that the support expressed by both Wildlife and OHS is sufficient to enable Marathon Gold Corporation to obtain the appropriate gate permitting.
Also please note that all gates are clearly marked with signage, bright orange paint and abundant reflective tape on both sides of the gate. The gated areas do not have any other road or trail access. During winter, when snowmobiles may enter sites without any trails, the gates are clearly marked (both sides) and cleared or snow (so highly visible).

Please advise if you wish any additional information.

Regards, Sherry

---------- Forwarded message ----------
From: Barnes, Blair <blairbarnes@gov.nl.ca>  
Date: Wed, Aug 24, 2016 at 4:08 PM  
Subject: RE: Crown lands application  
To: Sherry Dunsworth <___@email.com>

Hello Sherry

We will continue this year to make a presence at your site and have Public Safety issues with hunters addressed.

Blair Barnes  
Detachment Supervisor

Fish and Wildlife Enforcement Division  
Department of Justice and Public Safety  
Government of Newfoundland and Labrador  

9 Queensway Drive  
P.O. Box 11, 3 Cromer Ave  
Grand Falls-Windsor, NL A2A 1W9  
e. blairbarnes@gov.nl.ca  
   t. 709-292-4943  
   f. 709-292-4942
Hi Blair,

I gave you a call and left a message this morning regarding Marathon Gold Corporation's installation of control gates to keep out workers safe from hunters and the general public away from our work sites.

Would you be able to send me a quick note stating something to the effect that you would recommend we have the gates in place to control hunting too close to our workplaces and camps.

Thank you, Sherry

---------- Forwarded message ----------
From: Hearns, Peter <peterhearns@gov.nl.ca>
Date: Wed, Aug 24, 2016 at 9:40 AM
Subject: Crown lands application
To: "Sherry Dunsworth [mailto:********@gmail.com]" <********@gmail.com>
Cc: "Mercer, Dave W" <davemercury@gov.nl.ca>

Hi Sherry,
I was just talking to Dave Mercer about your upcoming application and he asked me to remind you that the application cost is $150 + HST ($172.50).

Would you please include any correspondence that you have that recommend gates with your Crown lands application. Preferably the ones where you mentioned Wildlife Division, Occupational Health and Safety and any others that you might have.

Thanks,

Peter

Peter Hearns, MES
Manager of Resource Evaluation and Policy Integration
Land Management Division, Dept. of Municipal Affairs
Email: peterhearns@gov.nl.ca | Tel: (709) 729-3231

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

Tel: 1.709.686.0153
Cell: 1.709.686.2317
Fax: 1.709.686.2317

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Hi Rodger,

I was just talking to Darren about the Marathon Gold application (that includes gates)...

Thanks,

Peter

Peter Hearns, MES
Manager of Resource Evaluation and Policy Integration
Land Management Division, Dept. of Municipal Affairs
Email: peterhearns@gov.nl.ca | Tel: (709) 729-3231

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Coles Notes version:

EA comments:

- Upon review it has been determined there are a number of gates indicated in this submission. Gates are not permitted on roads located on Crown lands without the permission of the Minister responsible for the Lands Act.
- New access roads on Crown lands require submission of a Crown lands application and approval to construct. The applicant should contact the Regional Lands Office in Gander regarding the Crown lands application process.
- Should the applicant require gating or exclusive access for any reason, this must be indicated on the Crown lands application form.

For previous roads Marathon Gold had not applied to Crown Lands for permission to construct. Through the EA we noticed this and informed them that they had to apply for permission to construct those roads.

- CL app 150214 – Appears to have been submitted on Nov 2, 2016
- [Redacted]
- EA noted that they did NOT make gates a condition of release.
- CRLO noted that the company needed to justify the use of gates and exclusive use.
- We decided to get a few extra referrals sent out for the CL app. Welson Roberts was going to respond for DHS
- FWED (JPS) had also sent an email to Marathon Gold supporting the use of gates. [Redacted] (See attached email to you on 8/25/2016)

From: Moore, Darren E.
Sent: Tuesday, November 22, 2016 8:46 AM
To: Heams, Peter
Subject: FW: Marathon Mining

Please review and see me.

From: Taylor, Hayward
Sent: Monday, November 21, 2016 11:57 AM
To: Blake, John; Sheppard, Kevin; Moore, Darren E.; Maloney, James; Skeard, Francis B.
Subject: RE: Marathon Mining

Hi John;
I have made a couple of minor highlighted suggestions to the attachment. I will also note the following:
- FWED do not have any authority to enforce the Crown Lands legislation and cannot deal with the roads being gated and locked (we have received complaints of this in other areas of the province as well)
- Perhaps the complainant should be provided the contact information for Crown Lands to deal with the Gating issue.
- There is no breach of legislation by the company placing the No Hunting signs in the area so unfortunately all FWED can do is ask for the company to remove the signs and not place them up.

Regards

Sec 29 (1)(a)

Hayward Taylor
Chief
Fish and Wildlife Enforcement Division
Department of Justice and Public Safety
Government of Newfoundland and Labrador
115 Riverside Drive
P.O. Box 2005
Corner Brook, NL A2H 6N6
e. haywardt@gov.nf.ca
t. 709-637-2974
t. 709-637-2975
w. www.stoppoaching.ca
Report Poachers – 1-877-820-0899

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From: Blake, John
Sent: Monday, November 21, 2016 8:53 AM
To: Sheppard, Kevin; Moore, Darren E.; Maloney, James; Skeard, Francis B.; Taylor, Hayward
Subject: Marathon Mining

Hello. Our Minister has several emails from an individual complaining about the number of “inappropriately placed” signs advising of no hunting and no trespassing in the area of Victoria Lake (Marathon Mining), and also, the fact many traditional roads have been “gated” and locked. This person alleges the number to be close to one Hundred signs placed over the Eleven kilometre stretch of road, and also alleges that Marathon usually only has Two to Four employees working in this large expanse of an area marked by them as No Hunting due to work operations.

The attached is a draft response. Your input is appreciated. Kevin. To whom would we direct correspondence to at Marathon if the Minister so chooses? Frank. Can you confirm the issuance of commercial cutting permits?

As there are now several emails outstanding on this, your timely attention is appreciated.

John

John Blake
Director of Wildlife
Department of Environment and Conservation
Wildlife Division
P.O. Box 2007, 117 Riverside Drive
Corner Brook, NL A2H 7S1
Telephone: (709) 637-2006 - Fax: (709) 637-2033
OPINION REQUEST FORM

DATE (yyyy/mm/dd): 2016 / 04 / 21

FILE REF. No.: 2.2131.0010
REG. No.: 1839

NAME & AGENCY:

Peter Hearns
Manager of Resource Evaluation and Policy Integration
Land Management Division, Lands Branch
Department of Municipal Affairs

RE: Valentine Lake Mineral Exploration & Access Rd.

BY: Marathon Gold Corporation

AT: Central NL, Victoria Lake

Please check one of the following: (Record comments on attached sheet)

☐ a) An Environmental Impact Statement is recommended.

☐ b) An Environmental Impact statement may be required and an Environmental
 Preview Report is recommended.

☒ c) The Undertaking may be released from environmental assessment.

☐ d) Recommend undertaking be rejected due to unacceptable effects.

ENVIRONMENTAL ASSESSMENT COMMITTEE NOMINATION:

Please complete the appropriate section:

☐ 1) I nominate [Name] to represent this department on an
 Assessment Committee if one is needed.

I also nominate [Name] as an alternate in the event that the above nominee is unavailable.

☒ 2) I do not think it is necessary for this Department to be represented in this case and therefore will make no nominations.

Screening Representative:

[Signature]
Date (yyyy/mm/dd): 2016 / 05 / 24

for Deputy Minister:

[Signature]
Date (yyyy/mm/dd): 2016 / 05 / 24

NOTE: OPINION IS DUE ON May 12, 2018

P.O. Box 800, St. John's, NL, Canada A1B 4C6 Tel: 709-729-9693 Fax: 709-729-9518
Comments:
What are your agency's regulatory requirements relevant to this proposal?

- Upon review it has been determined there are a number of gates indicated in this submission. Gates are not permitted on roads located on Crown lands without the permission of the Minister responsible for the Lands Act.
- New access roads on Crown lands require submission of a Crown lands application and approval to construct. The applicant should contact the Regional Lands Office in Gander regarding the Crown lands application process.
Strowbridge, Kerry

Hi Stephen,

A permission or Licence usually is issued in 5 year increments, but the actual term is set in the title or permission document. I’ve seen a 20 year LTO. A permission is not an official title, but is an approval to perform work on Crown lands. It is used almost exclusively for the construction of roads when the roads will end up being able to be used by the public. Permissions were meant to allow companies to do work on Crown lands prior to gaining title [See attached directive].

Sec 29 (1)(a)

Peter

From: Hinchey, Stephen
Sent: Monday, November 21, 2016 1:08 PM
To: Hearns, Peter
Subject: FW: Crown Lands Referral - App# 150214 - Marathon Gold Corporation

Peter,

I am currently reviewing an application for permission to construct and gate a number of access roads and have a few questions: when does a 'permission' issued under the Lands Act expire? Once the construction is complete? Is a permission really just a licence to occupy by another name? If so, does the permission / LTO persist for a set term as defined on the title document?

Stephen Hinchey
Mineral Lands Division, Mines Branch, DNR

From: Centrallandsoffice
Sent: Thursday, November 03, 2016 3:27 PM
To: Mercer, Dave W; Carter, Paul A.; Cleary, Bas; Rowe, Brenda C.; Snow, Eileen; Greene, Sean; Drake, Martha; Mercer, Delphina; Hinchey, Stephen; Snow, Matthew; Lawlor, Mark; Tizzard, Jamie; Oke, Bryan; Gilliard, Carol-Ann; Fenske, Jana; Miller, Kirsten; MacWhirter, Stephanie; Kavli, Darren F.; Roberts, Welson; Maloney, James; Barnes, Blair
Subject: Crown Lands Referral - App# 150214 - Marathon Gold Corporation

Your name was provided as a contact for your agency to receive and respond to the attached Crown lands referral. Please respond within 21 days.

If you have any questions, contact the Central Regional Lands Office at 256-1400. If responding by email, please indicate the application number, Department name and approved or not in the subject line. Thank you.
GOVERNMENT OF NEWFOUNDLAND AND LABRADOR
LANDS BRANCH
POLICY DIRECTIVE

Source: Departmental  Policy No.: AP.010
Division: Crown Lands/ Land Management Division

Approved by: Allister Taylor ADM  November 6, 2006 Date
Authorized by: Brenda Caul DM  November 7, 2006 Date

TITLE:
Applications: Special Works Projects.

RELATIONSHIP TO PREVIOUS POLICY:
Supersedes AP.010 dated 1985-04-01.

OBJECTIVE:
Policy for the processing of applications pertaining to special works projects.

POLICY:
Applications for special works projects may require permission to occupy Crown land prior to receiving a formal title document in order to avail of funding that may only be available within a limited time period. The Department shall expedite applications whenever possible to facilitate such projects.

PROCEDURE:

1. Applications for special Works Projects shall be processed in accordance with standard procedures. The Regional Lands Manager may issue a letter of approval (Appendix A) to occupy Crown land if the referrals indicate that there are no objections to the proposed development.
APPENDIX “A”

Permission to Occupy Crown Land

TO WHOM IT MAY CONCERN

Permission is hereby given to ____________________________ to enter upon Crown land situated ____________________________, as shown on the attached plan for purpose of ____________________________, as outlined in Crown land application number ____________________________.

This permission constitutes approval of the Lands Branch, Department of Environment and Conservation only and does not waive the required consent of other branches of the Department of Government Services or other Departments or Agencies. Furthermore, this permission does not authorize the holder to enter upon private land, to dispute private claims to land, or to obstruct any rights-of-way that may exist in the Area to be occupied.

Pending final approval of the application and issuance of a title document, or in the event that a title document cannot be issued for any reason, the undersigned (holder) agrees to indemnify and save harmless the minister of Environment and Conservation and his/her employees and agents and the Government of Newfoundland and Labrador and its employees and agents against any and all liability, loss, damages, costs and expenses resulting, for whatever reason, directly or indirectly from the undersigned’s (holder’s) use or occupation of the land.

A cutting permit must be obtained prior to the clearing of any timber.

Regional Lands Manager

Attachment
Hello again Dave,

Here is the e-mail again with attached files.

Regarding the question of years, we would need 2016-2017 and also perhaps do 5 years if possible (similar to the 5 year permits we have for water and temporary occupancy).

Thank you, Sherry

--------- Forwarded message ---------
From: Sherry Dunsworth @gmail.com
Date: Mon, Sep 12, 2016 at 12:11 PM
Subject: Re: GIS Files
To: "Mercer, Dave W" <davemercher@gov.nl.ca>

Hi Dave,

Here are the files - (1) gate locations, (2) the new 2016 road access for drilling, and (3) file with all the older historical logging roads and drill access trails used in the past.

Let me know if any issue. I am currently in Toronto and on the Denver for conference so may be delays in e-mails.

Sherry

On Mon, Sep 12, 2016 at 10:33 AM, Mercer, Dave W <davemercher@gov.nl.ca> wrote:

Hi Sherry,

I was wondering if you could send me your GIS files for the roads and gates you are applying for (2015 and 2016)? It would ensure we have the exact locations. Shape files (preferred) or CAD would work.

Regards,
Dave Mercer

Land Management Specialist

Dept. of Municipal Affairs

Crown Lands Administration Division

Government of Newfoundland and Labrador

P.O. Box 2222

Gander, NL A1V 2N9

T: (709) 256-1407, F: (709) 256-1095

E: davemercer@gov.nl.ca

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Sherry Dunsworth, M.Sc., P.Geo.

V.P. Exploration

Marathon Gold Corporation

P.O. Box 160,

Pasadena, NL, A0L 1K0

Tel: 1.709.686.0153

Cell: 1.709.686.2317

Fax: 1.709.686.2317

Sherry Dunsworth, M.Sc., P.Geo.

V.P. Exploration

Marathon Gold Corporation

P.O. Box 160,

Pasadena, NL, A0L 1K0

Tel: 1.709.686.0153
Dave,

When you get the application Welson Roberts will review it on behalf of OHS.

Thanks,

Peter

Peter Hearns, MES
Manager of Resource Evaluation and Policy Integration
Land Management Division, Dept. of Municipal Affairs
Email: peterhearns@gov.nl.ca | Tel: (709) 729-3231

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Yes - it is $172.50 - just me rushing as super busy!

On Fri, Aug 26, 2016 at 3:27 PM, Mercer, Dave W <davemercer@gov.nl.ca> wrote:

Check on the amount before you write the cheque!

Regards,

Dave Mercer
Land Management Specialist

Dept. of Municipal Affairs
Crown Lands Administration Division
Government of Newfoundland and Labrador
P.O. Box 2222
Gander, NL A1V 2N9
T: (709) 256-1407, F: (709) 256-1095
E: davemercer@gov.nl.ca

Thank you Dave.
I have found someone in Pasadena (Town Manager) and the application is in the mail to you plus relevant information and cheque for $1772.50.

Regards, Sherry

On Fri, Aug 26, 2016 at 3:16 PM, Mercer, Dave W <davemercer@gov.nl.ca> wrote:
Sherry,

The following can administer an oath:

- Commissioner of Oaths
- Barrister
- MHA
- Justice of the Peace
- Mayor

Hope this helps in finding someone.

Regards,

Dave Mercer
Land Management Specialist

Dept. of Municipal Affairs
Crown Lands Administration Division
Government of Newfoundland and Labrador
P.O. Box 2222
Thank you.

I will continue to pursue finding an official.

Sherry

On Fri, Aug 26, 2016 at 10:23 AM, Hearns, Peter <peterhearns@gov.nl.ca> wrote:

You need it for both the roads and the gates as both should be on the same application as far as I know. Best if Dave suggests how to proceed.

Hi Peter,

I am just back from another analysts tour of the Valentime exploration camp but having an issue finding an official in Pasadena area to sign the application form as people are on holiday or sick.
Does the application form require the official oath signature for just the gates?

Thanks, Sherry

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

Tel: L709.686.0153
Cell: L...
Fax: L709.686.2317

@ gmail.com

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Pasadena, NL, A0L 1K0
Tel: 1.709.686.0153
Cell: 1. [redacted]
Fax: 1.709.686.2317
[redacted]@gmail.com

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Sherry Dunsworth, M.Sc., P.Geo.
V.P. Exploration
Marathon Gold Corporation
P.O.Box 160,
Pasadena, NL, A0L 1K0
Tel: 1.709.686.0153
Cell: 1. [redacted]
Fax: 1.709.686.2317
[redacted]@gmail.com

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You need it for both the roads and the gates as both should be on the same application as far as I know. Best if Dave suggests how to proceed.

From: Sherry Dunsworth [mailto:sherry.dunsworth@gmail.com]
Sent: Friday, August 26, 2016 10:22 AM
To: Hearns, Peter
Cc: Mercer, Dave W
Subject: Does the gate form need signing by Official Admin Oath?

Hi Peter,

I am just back from another analysts tour of the Valentine exploration camp but having an issue finding an official in Pasadena area to sign the application form as people are on holiday or sick.

Does the application form require the official oath signature for just the gates?

Thanks, Sherry

---
Sherry Dunsworth, M.Sc.,P.Geo.
V.P. Exploration
Marathon Gold Corporation
P.O.Box 160,
Pasadena, NL, A0L 1K0
Tel: 1.709.686.0153
Cell: 1.709.686.0017
Fax: 1.709.686.2317
sherry.dunsworth@gmail.com
From: Keeping, Brent  
Sent: Thursday, July 07, 2016 9:11 AM  
To: Abdel-Razek, Dr. Abdel-Zafer; Angelopoulos, John; Barnes, Janice; CEAA - Joseph Vigder; Clarke, Elaine; Crane, Gerald; Curran, Rick J.; Davis, Corrie; DFO Contact; Drake, Martha; FCR_Tracker (Dartmouth); Forsey, Rod; Grzetic, Brenda; Harvey, Max; Health Canada; Hearns, Peter; Hilyard, Rod; Hinchee, Stephen; Johnson, Darryl; Khan, Haseen; Locke, Robert C.; Lynch, Wayne; Miller, Kirsten; Morrissey, John; Nunn, Ges; Otto, Rob; PNAD.Referrals; Rees, Bobbi; Sheppard, Dion D.; Tapper, Jill; Transport Canada  
Cc: Abdel-Razek, Dr. Abdel-Zafer; Angelopoulos, John; Barnes, Janice; CEAA - Joseph Vigder; Clarke, Elaine; Crane, Gerald; Curran, Rick J.; Davis, Corrie; DFO Contact; Drake, Martha; EA Project Comments; FCR_Tracker (Dartmouth); Forsey, Rod; Grzetic, Brenda; Harvey, Max; Health Canada; Hearns, Peter; Hilyard, Rod; Hinchee, Stephen; Johnson, Darryl; Khan, Haseen; Locke, Robert C.; Lynch, Wayne; Miller, Kirsten; Morrissey, John; Nunn, Ges; Otto, Rob; PNAD.Referrals; Rees, Bobbi; Sheppard, Dion D.; Tapper, Jill; Transport Canada  

Subject: Released from Environmental Assessment - 1839 Valentine Lake Mineral Exploration & Access Rd.  

EA Screening Committee,  
Please see the attached Minister’s letter releasing the project subject to conditions.  
Also attached are the agency comments received during the review.  

Thank you,

From: EA Project Comments  
Sent: Thursday, April 21, 2016 12:22 PM  
To: Abdel-Razek, Dr. Abdel-Zafer; Angelopoulos, John; Barnes, Janice; CEAA - Joseph Vigder; Clarke, Elaine; Crane, Gerald; Curran, Rick J.; Davis, Corrie; DFO Contact; Drake, Martha; EA Project Comments; FCR_Tracker (Dartmouth); Forsey, Rod; Grzetic, Brenda; Harvey, Max; Health Canada; Hearns, Peter; Hilyard, Rod; Hinchee, Stephen; Johnson, Darryl; Khan, Haseen; Locke, Robert C.; Lynch, Wayne; Miller, Kirsten; Morrissey, John; Nunn, Ges; Otto, Rob; PNAD.Referrals; Rees, Bobbi; Sheppard, Dion D.; Tapper, Jill; Transport Canada  
Cc: Keeping, Brent; Abdel-Razek, Dr. Abdel-Zafer; Angelopoulos, John; Barnes, Janice; CEAA - Joseph Vigder; Clarke, Elaine; Crane, Gerald; Curran, Rick J.; Davis, Corrie; DFO Contact; Drake, Martha; EA Project Comments; FCR_Tracker (Dartmouth); Forsey, Rod; Grzetic, Brenda; Harvey, Max; Health Canada; Hearns, Peter; Hilyard, Rod; Hinchee, Stephen; Johnson, Darryl; Khan, Haseen; Locke, Robert C.; Lynch, Wayne; Miller, Kirsten; Morrissey, John; Nunn, Ges; Otto, Rob; PNAD.Referrals; Rees, Bobbi; Sheppard, Dion D.; Tapper, Jill; Transport Canada  


Please find attached comment forms for Registration # 1839  

Registration #: 1839  
Title of Project: Valentine Lake Mineral Exploration & Access Rd.  
Proponent: Marathon Gold Corporation  
Opinion Request Forms due: May 12, 2016
Please submit Opinion Request Forms (preferably electronically) and comments (as a word file) to EA_Project_Comments@gov.nl.ca on or before the deadline.

The EA Coordinator for this project is Brent Keeping (bkeeping@gov.nl.ca or 729-4223).

Please refer to registration document online at

Thank you.
Hello Dave,

I have attached a folder with a scan of the application for the gates and roads plus 3 figures - for Marathon Gold Corporation - gates and drill access roads - Valentine Lake Property.

Could you please take a look at the attached application and figures and let me know if anything is missing before I send the original along to you in the mail with the appropriate fee ($150).

I am delayed submitting as looking for someone to sign off with power of oaths. Should have this evening.

Thank you, Sherry

---
Sherry Dunsworth, M.Sc., P.Geo.
V.P. Exploration
Marathon Gold Corporation
P.O. Box 160,
Pasadena, NL, A0L 1K0
Tel: 1.709.686.0153
Cell: [Redacted]
Fax: 1.709.686.2317
[Redacted]
Hi Sherry

Include all the sites you require and have received approval for. If we are not aware of the site, it will not be considered.

Regards,

Dave Mercer
Land Management Specialist

Dept. of Municipal Affairs
Crown Lands Administration Division
Government of Newfoundland and Labrador
P.O. Box 2222
Gander, NL A1V 2N9
T: (709) 256-1407, F: (709) 256-1095
E: davemercer@gov.nl.ca

Hi Dave,

I have infilled the form for the gates application.

Should I also include in the application the new 2016 drill access trails that were released by Department of Environment via Marathon’s EAA? Would you also want any other drill access trails we have used in the past and continue to use?

Once I have these answers I will send along the application and money asap.

Thank you, Sherry

---

Sherry Dunsworth, M.Sc., P.Geo.
V.P. Exploration
Marathon Gold Corporation
P.O.Box 160,
Pasadena, NL, A0L 1K0
Tel: 1.709.686.0153
Cell: 1.647.302.3237
Fax: 1.709.686.2317
sherrydunsworth@gmail.com
Yes, this is still the form that you have to use. I just filled in some to try and explain it. You will need to describe the location and size of the roads and some more info. For further help Dave Mercer would be the better person to guide you.

Peter

From: Sherry Dunsworth [mailto:***********@gmail.com]
Sent: Tuesday, August 16, 2016 1:52 PM
To: Hearns, Peter
Subject: Re: FW: Gates on your roads Valentine Lake Mineral Exploration and Access Roads - EA 1839

Thank you for the form Peter, however, it is the same form that was sent to me by Dave Mercer and pertains to Crown Land application.

Where on this application would you like me to apply for gates with brief description of why? Do I need to infill all the other information or just note our existing Temporary Work Camp Permit number?

Regards, Sherry

On Tue, Aug 16, 2016 at 12:31 PM, Hearns, Peter <peterhearns@gov.nl.ca> wrote:

This is the application that you can use for the roads. To justify the gates you just need to mention the recommendation from Wildlife, DHS, and EA.

Refer to EA 1839

Hi Sherry,
I've attached the required application for you to submit for the roads you require. Exclusive access is not normally given to a private company. Provide a justification with your application on why each requires exclusive access and why gates are required.

I've copied your request to William Oldford (Mines) to see if your request can be accommodated under legislation dealing with quarries or mining issues.

Regards,

Dave Mercer
Land Management Specialist

Dept. of Municipal Affairs
Crown Lands Administration Division
Government of Newfoundland and Labrador
P.O. Box 2222
Gander, NL    A1V 2N9
T: (709) 256-1407, F: (709) 256-1095
E: davemercer@gov.nl.ca

From: Hearns, Peter
Sent: Monday, July 18, 2016 1:38 PM
To: Mercer, Dave W
Subject: RE: Gates on your roads Valentine Lake Mineral Exploration and Access Roads - EA 1839

Dave,

Attached is our response to the EA. Sec 29 (1)(a)
Hi Dave,

Marathon Gold Corporation has a Temporary Work Camp Permit #138262 covering the time period of June 10, 2015 to June 10, 2019.

I have been in touch with you in the past regarding this permit and also the septic system which was passed through your department, approved by Michele Craig and inspected by Carl Boone back in 2010-2011.

I have been directed to you again regarding the permitting for gates at our work site. The 5 gates are located along our drill access trails and roads as well as the end of the gravel road into our permitted work camp site. The gates are in place as a safety precaution to prevent unauthorized access by the general public into our work sites where there is drilling equipment operating and also to prevent hunting within a kilometer of our work camp. In the past we have had hunters discharging firearms directly along the gravel road and within 100-200 meters of the permitted work camp. The Department of Wildlife has been informed of these unsafe shooting incidents and they have also stayed in our camp two years ago and worked from the camp when monitoring hunting activity in the area.

I had been in touch with Crown Lands last year to discuss permitting for the gates after the Department of [redacted] I have called your office and left a message on your answering service and will call back again later today regarding the issuance of a permit for gates.

Thank you, Sherry
On Mon, Jul 18, 2016 at 10:42 AM, Hearns, Peter <peterhearns@gov.nl.ca> wrote:

Hi Sherry,

The best thing to do is to contact the Central Regional Lands Office in Gander. They can guide you through the Crown lands application process for both the roads and the gates.

I recommend contacting Dave Mercer @ 709-256-1407 or davemercer@gov.nl.ca. He is one of the Land Management Specialists for that area. The Crown lands application would be submitted to them at their Gander office.

If you have any questions feel free to contact me as well.

Thanks,

Peter

Peter Hearns, MES
Manager of Resource Evaluation and Policy Integration
Land Management Division, Dept. of Municipal Affairs
Email: peterhearns@gov.nl.ca | Tel: (709) 729-3231

From: Sherry Dunsworth [mailto:sherrydunsworth@gmail.com]
Sent: Friday, July 08, 2016 2:17 PM
To: Keeping, Brent
Cc: Hearns, Peter
Subject: Re: Gates on your roads Valentine Lake Mineral Exploration and Access Roads - EA 1839

Thank you Brent.
I will contact Peter Hearn.

Regards, Sherry

On Fri, Jul 8, 2016 at 2:09 PM, Keeping, Brent <BrentKeeping2@gov.nl.ca> wrote:

Hi Sherry,

As discussed just now during the review of the release of your project, you will need to include a request for gates in your application for Crown lands.

Peter Hearns is familiar with your project and so I suggest that he may be of help in walking you through the application process. Or perhaps he will direct you to the right contact.

I have copied him here.

Kind regards,

Brent

Brent Keeping
Environmental Scientist
Environmental Assessment Division
Dept. Environment and Conservation
St. John's, NL

Phone (709) 729-4223
Fax (709) 729-5518

Email: bkeeping@gov.nl.ca
Sherry Dunsworth, M.Sc., P.Geo.

V.P. Exploration

Marathon Gold Corporation

P.O.Box 160,

Pasadena, NL, A0L 1K0

Tel: 1-709-686-0153

Cell: 1-709-686-2317

Fax: 1-709-686-2317

@ymail.com

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Sherry Dunsworth, M.Sc., P.Geo.
V.P. Exploration
Marathon Gold Corporation
P.O.Box 160,
Pasadena, NL, A0L 1K0
Tel: 1.709.686.0153
Cell: 1.709.686.2317
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APPLICATION FOR CROWN LANDS

FOR DEPARTMENT USE ONLY

APPLICATION NO. RECEIPT NO. 
FILE NO. AMOUNT DATE 
DATE REGISTERED INDICATED ON PLAN NO. 
INITIAL TOPO NO. INITIAL 

APPLICANT INFORMATION

SURNAME GIVEN NAME MIDDLE NAME AGE 
MAILING ADDRESS 
CITY/TOWN PROVINCE POSTAL CODE 
BUSINESS TELEPHONE HOME TELEPHONE 
ARE YOU A RESIDENT OF THE PROVINCE OF NEWFOUNDLAND AND LABRADOR? YES NO 
ARE YOU AN EMPLOYEE OF THE DEPARTMENT OF MUNICIPAL AFFAIRS? YES NO 
HAVE YOU, YOUR SPOUSE, OR ANY DEPENDENT CHILDREN EVER APPLIED FOR, OR RECEIVED LAND FROM THE CROWN? YES NO 
IF YES, SPECIFY TITLE NO.(S). 138262 

PROPOSED TENURE AND USE

TYPE OF APPLICATION LEASE GRANT LICENCE TO OCCUPY 
LAND USE RESIDENCE COTTAGE AQUACULTURE AGRICULTURE (provide details below) 
COMMERCIAL (provide detailed description below) DINER (provide details below) 

Building mineral exploration roads near Valentine Lake.

We are seeking exclusive use of the roads that we construct. We are also seeking permission to erect gates on these roads as per recommendations from OHS, Wildlife Division and EA. This project was reviewed as EA 1839 and was released on July 14, 2016.

DESCRIBE BUILDINGS TO BE ERECTED (if applicable) 
DIMENSIONS: LENGTH WIDTH 
PROPOSED WATER AND SEWAGE FACILITIES (if applicable) 
WELL SEPTIC MUNICIPAL WATER MUNICIPAL SEWER OTHER (provide details below) 
N/A
**LAND DESCRIPTION**

1. THE LAND IS SITUATED AT

IN THE ELECTORAL DISTRICT OF

2. IS THE LAND APPLIED FOR LOCATED WITHIN MUNICIPAL BOUNDARIES? □ YES □ NO

IF YES, YOU MUST ENCLOSE A MUNICIPAL RECOMMENDATION FORM

IF YES, YOU MUST ENCLOSE A MUNICIPAL RECOMMENDATION FORM

NOTE: THIS FORM IS AVAILABLE FROM THE MUNICIPAL COUNCIL, REGIONAL LANDS OFFICE, & GOVERNMENT SERVICE CENTRES

3. APPROXIMATE DIMENSIONS OF THE LAND

FRONTAGE ___________ metres

DEPTH ___________ metres

4. DISTANCE TO CLOSEST WATERBODY

NAME OF WATERBODY (If applicable)

5. IS THE SITE ACCESSIBLE BY ROAD? □ YES □ NO

IF NO, WILL THE SITE REQUIRE NEW ROAD CONSTRUCTION FOR ACCESS? □ YES □ NO

IF YES, WHAT WILL BE THE APPROXIMATE LENGTH OF THE ROAD? ___________ metres

FOR SITES WITHOUT ROAD ACCESS, PLEASE INDICATE METHOD OF TRANSPORTATION

- WALKING
- A.T.V.
- BOAT
- SNOWMOBILE
- AIRCRAFT

FOR SITES WITHOUT ROAD ACCESS, LOCATION OF ACCESS ROUTE MUST BE INDICATED ON THE MAP ATTACHED TO THE APPLICATION AND ACCESS BY A.T.V. MUST BE IN ACCORDANCE WITH A.T.V. REGULATIONS.

6. IS THE SITE PRESENTLY OCCUPIED: FENCES, BUILDINGS, SIGNS, CLEARING, LOCAL UNDERSTANDING? □ YES □ NO

**Site is being used for the Valentine Lake Mineral Exploration Program by Marathon Gold Corporation**

7. ARE YOU AWARE OF ANY EVIDENCE OF PREVIOUS LAND USE, SUCH AS FENCES, BUILDINGS, SIGNS, CLEARING, LOCAL UNDERSTANDING, ETC.? □ YES □ NO

IF YES, STATE YEAR OCCUPATION COMMENCED, AREA OCCUPIED AND NAME OF PERSON WHO DEVELOPED OR OCCUPIED THE LAND

**DESCRIPTION OF LAND**

Please Note: When your application is accepted by this Department you are required to identify the site in the field by clearly marking your corner posts. If there is a discrepancy between the area marked in the field and the area indicated on the map, the latter shall prevail.

Sketch the land applied for showing distance to prominent nearby features such as buildings, fences, road intersections. Map must also be attached.

- BOUNDED ON NORTH BY
- BOUNDED ON SOUTH BY
- BOUNDED ON EAST BY
- BOUNDED ON WEST BY

**PLEASE NOTE:** IT IS THE POLICY OF THE CROWN LANDS DIVISION TO ACCEPT APPLICATIONS ON A FIRST COME - FIRST SERVED BASIS. APPLICATIONS MUST BE FULLY COMPLETED, WITH A MAP SHOWING THE EXACT LOCATIONS OF THE LAND APPLIED FOR TOGETHER WITH THE APPLICATION FEE. THE APPROVED MUNICIPAL RECOMMENDATION FORM FROM COUNCIL, IF APPLICABLE, MUST ALSO BE ATTACHED. ONLY THEN WILL THE APPLICATION BE ACCEPTED AND DEEMED REGISTERABLE BY THIS DEPARTMENT.
AFFIDAVIT OF APPLICANT (to be read carefully)

I, do hereby make oath and declare as follows:

(a) The information contained in this application is true and correct to the best of my knowledge and belief.

(b) I have inspected the land applied for and have found no evidence of occupation (with the exception of No. 6 and/or No. 7 on page 2, where applicable).

(c) I am not aware of any adverse claim to the land applied for by any person(s).

(d) I recognize and accept that I am solely responsible for correctly identifying the parcel of land that is the subject of this application.

(e) I fully understand that acceptance of this application by the Department does not give me any rights or privileges in relation to the land under application.

(f) I FULLY UNDERSTAND THAT THE LAND IS NOT TO BE OCCUPIED UNTIL I RECEIVE A FULLY EXECUTED TITLE DOCUMENT.

(g) I FULLY UNDERSTAND THAT UNDER SECTION 14 OF THE LANDS ACT, THE MINISTER OF MUNICIPAL AFFAIRS OR THE LIEUTENANT-GOVERNOR IN COUNCIL MAY CANCEL, AMEND OR OTHERWISE DEAL WITH THE GRANT, LEASE, LICENCE OR EASEMENT AT ANY TIME PRIOR TO THE DELIVERY OF A FULLY EXECUTED TITLE DOCUMENT.

Sworn before me

At

this , day of 20

Official Administering Oath

Applicant's Signature

NOTE: A non-refundable processing fee of ONE HUNDRED AND FIFTY DOLLARS ($150.00 plus H.S.T.) must accompany this application.

Cheques or money orders are to be made payable to the NEWFOUNDLAND EXCHEQUER ACCOUNT.
### SUMMARY OF AGENCY REFERRALS

<table>
<thead>
<tr>
<th>Agency</th>
<th>Approved</th>
<th>Refused</th>
<th>Comments Attached</th>
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**Officers Comments:**


Date

Lands Management/Lands Officer

### Recommendation of Regional Office:

- Approved (Complete section below)
- Refused (Give reason)


Date

Regional Lands Manager

This section to be completed by Regional Office when approval is recommended.

- Area approved
- Frontage
- Consideration/Rental
- Back/Rental
- Lease
- Grant
- Licence
- Other
- Type

- Cabinet approval required: Yes, No

Special instructions to surveyor (if any):


Departmental decision:

- Approved
- Refused
- Deferred
- To Cabinet

Special Instructions:


Date

Director of Lands Management
**FOR DEPARTMENT USE ONLY**

Special Conditions of Approval:

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256
Dave,

I spoke to Sherry and gave her the advice below. We can permit gates on these roads with the condition that when they are finished with the roads, the gates have to be removed and that they are responsible for them. OHS, Wildlife and EA recommend the gates as hunters were coming in and firing their rifles in close proximity to the camp.

Similar to Nalcor, where they are building the exploration roads, we can probably give them exclusive use.

Peter

From: Hearn, Peter  
Sent: Tuesday, August 16, 2016 12:32 PM  
To: Sherry Dunsworth  
Subject: FW: Gates on your roads Valentine Lake Mineral Exploration and Access Roads - EA 1839

This is the application that you can use for the roads. To justify the gates you just need to mention the recommendation from Wildlife, OHS and EA.

Refer to EA 1839

From: Mercer, Dave W  
Sent: Monday, July 18, 2016 4:12 PM  
To:  
Cc: Hearn, Peter; Oldford, William  
Subject: RE: Gates on your roads Valentine Lake Mineral Exploration and Access Roads - EA 1839

Hi Sherry,

I’ve attached the required application for you to submit for the roads you require. Exclusive access is not normally given to a private company. Provide a justification with your application on why each requires exclusive access and why gates are required.

I’ve copied your request to William Oldford (Mines) to see if your request can be accommodated under legislation dealing with quarries or mining issues.

Regards,

Dave Mercer
Land Management Specialist

Dept. of Municipal Affairs
Crown Lands Administration Division
Government of Newfoundland and Labrador
P.O. Box 2222
Gander, NL  A1V 2N9
From: Hearns, Peter
Sent: Monday, July 18, 2016 1:38 PM
To: Mercer, Dave W
Subject: RE: Gates on your roads Valentine Lake Mineral Exploration and Access Roads - EA 1839

Dave,

Attached is our response to the EA. I believe the gates are a requirement imposed by the EA release, so this could also be incorporated into an LTO for their roads.

Peter

From: Sherry Dunsworth [mailto:sherrer@gmail.com]
Sent: Monday, July 18, 2016 1:35 PM
To: Mercer, Dave W
Cc: Keeping, Brent; Hearns, Peter
Subject: Re: Gates on your roads Valentine Lake Mineral Exploration and Access Roads - EA 1839

Hi Dave,

Marathon Gold Corporation has a Temporary Work Camp Permit # 138262 covering the time period of June 10, 2015 to June 10, 2019.

I have been in touch with you in the past regarding this permit and also the septic system which was passed through your department, approved by Michele Craig and inspected by Carl Boone back in 2010-2011.

I have been directed to you again regarding the permitting for gates at our work site. The 5 gates are located along our drill access trails and roads as well as the end of the gravel road into our permitted work camp site. The gates are in place as a safety precaution to prevent unauthorized access by the general public into our work sites where there is drilling equipment operating and also to prevent hunting within a kilometer of our work camp. In the past we have had hunters discharging firearms directly along the gravel road and within 100-200 meters of the permitted work camp. The Department of Wildlife has been informed of these unsafe shooting incidents and they have also stayed in our camp two years ago and worked from the camp when monitoring hunting activity in the area.

I had been in touch with Crown Lands last year to discuss permitting for the gates after the Department of Wildlife has been informed of these unsafe shooting incidents and they have also stayed in our camp two years ago and worked from the camp when monitoring hunting activity in the area.

I have called your office and left a message on your answering service and will call back again later today regarding the issuance of a permit for gates.

Thank you, Sherry

On Mon, Jul 18, 2016 at 10:42 AM, Hearns, Peter <peterhearns@gov.nl.ca> wrote:

Hi Sherry,
The best thing to do is to contact the Central Regional Lands Office in Gander. They can guide you through the Crown lands application process for both the roads and the gates.

I recommend contacting Dave Mercer @ 709-256-1407 or davemercer@gov.nl.ca. He is one of the Land Management Specialists for that area. The Crown lands application would be submitted to them at their Gander office.

If you have any questions feel free to contact me as well.

Thanks,

Peter

Peter Hearns, MES
Manager of Resource Evaluation and Policy Integration
Land Management Division, Dept. of Municipal Affairs
Email: peterhearns@gov.nl.ca | Tel: (709) 729-3231

From: Sherry Dunsworth [mailto:********@gmail.com]
Sent: Friday, July 08, 2016 2:17 PM
To: Keeping, Brent
Cc: Hearns, Peter
Subject: Re: Gates on your roads Valentine Lake Mineral Exploration and Access Roads - EA 1839

Thank you Brent.

I will contact Peter Hearns.
Regards, Sherry

On Fri, Jul 8, 2016 at 2:09 PM, Keeping, Brent <Brent Keeping2@gov.nl.ca> wrote:

Hi Sherry,

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Peter Hearns is familiar with your project and so I suggest that he may be of help in walking you through the application process. Or perhaps he will direct you to the right contact.

I have copied him here.

Kind regards,

Brent

Brent Keeping
Environmental Scientist
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Dept. Environment and Conservation
St. John's, NL

Phone (709) 729-4223
Fax (709) 729-5518

Email: bkeeping@gov.nl.ca

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Sherry Dunsworth, M.Sc., P.Geo.

V.P. Exploration

Marathon Gold Corporation

P.O. Box 160,

Pasadena, NL A0L 1K0

Tel: 1.709.686.0153

Cell: 1 [redacted]

Fax: 1.709.686.2317

[redacted]@gmail.com

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T: (709) 256-1407, F: (709) 256-1095
E: davemercer@gov.nl.ca

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Attached is our response to the EA. I believe the gates are a requirement imposed by the EA release, so I would assume that an LTO covering them off would suffice for all locations. This could also be incorporated into an LTO for their roads.
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Sent: Monday, July 18, 2016 1:35 PM  
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Email: peterhearns@gov.nl.ca | Tel: (709) 729-3231

From: Sherry Dunworth [mailto:redacted@gmail.com]
Sent: Friday, July 08, 2016 2:17 PM
To: Keeping, Brent
Cc: Hearns, Peter
Subject: Re: Gates on your roads Valentine Lake Mineral Exploration and Access Roads - EA 1839

Thank you Brent.

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@ gmail.com
Dave,

So that removes that argument. Other than Andrew and Milly, there is nobody here to advise me on a possible solution. They have installed gates on some of their roads without the proper authorization and want to install more on roads that they plan to construct. I understand that there has been some issues with gates in recent times as well. Since the proposal has gone through EA already, I would assume that there may not be any additional referrals required. I’ll leave this in Central Region’s capable hands.

Peter

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Cc: Keeping, Brent; Hearns, Peter
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Brent,

I was going over the conditions and comments for the Valentine Lake EA. From what I can see there was no requirement for them to gate the roads. Just to be sure, did anyone say that they should gate their roads?

Peter

From: Sherry Dunsworth [mailto:sherry.dunsworth@gmail.com]
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Dave,

The EA release requires the roads to be gated. For gating a road mines cannot give approval unless the road was on private land or within a quarry boundary or surface lease boundary. We were looking into the same issue for a mineral exploration road here on the Avalon and the only options for a gate were for TW to approve within the Road RoW or for Crown Lands to issue a title that allows it.

Peter

Hi Dave,

We were asked by Occupational Health and Safety and Department of Wildlife to put in the gates on our drill access trails because OHS was concerned for safety of workers and public while Wildlife did not want hunters going into these areas and having increased access for hunting.

I will give Bill a call to discuss re: Department of Mines - Quarries. I had this discussion with Jim Hinchey, Dept of Mines, a few years ago and Jim did not know of any permit forms for gates and had me contact Crown Lands which it did and was informed that there was no application for gates.

Thank you, Sherry

On Mon, Jul 18, 2016 at 4:12 PM, Mercer, Dave W <davemercer@gov.nl.ca> wrote:

Hi Sherry,

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I have been in touch with you in the past regarding this permit and also the septic system which was passed through your department, approved by Michele Craig and inspected by Carl Boone back in 2010-2011.

I have been directed to you again regarding the permitting for gates at our work site. The 5 gates are located along our drill access trails and roads as well as the end of the gravel road into our permitted work camp site. The gates are in place as a safety precaution to prevent unauthorized access by the general public into our work sites where there is drilling equipment operating and also to prevent hunting within a kilometer of our work camp. In the past we have had hunters discharging firearms directly along the gravel road and within 100-200 meters of the permitted work camp. The Department of Wildlife has been informed of these unsafe shooting incidents and they have also stayed in our camp two years ago and worked from the camp when monitoring hunting activity in the area.

I had been in touch with Crown Lands last year to discuss permitting for the gates after the Department of Wildlife advised us to install our gate 1 km from the camp. At that time I was advised by Crown Lands, Gander office that there was no such permit available. I have called your office and left a message on your answering service and will call back again later today regarding the issuance of a permit for gates.

Thank you, Sherry

On Mon, Jul 18, 2016 at 10:42 AM, Hearns, Peter <peterhearns@gov.nl.ca> wrote:

Hi Sherry,
The best thing to do is to contact the Central Regional Lands Office in Gander. They can guide you through the Crown lands application process for both the roads and the gates.

I recommend contacting Dave Mercer @ 709-256-1407 or davemercer@gov.nl.ca. He is one of the Land Management Specialists for that area. The Crown lands application would be submitted to them at their Gander office.

If you have any questions feel free to contact me as well.

Thanks,

Peter

Peter Hearns, MES
Manager of Resource Evaluation and Policy Integration
Land Management Division, Dept. of Municipal Affairs
Email: peterhearns@gov.nl.ca | Tel: (709) 729-3231

Thank you Brent.

I will contact Peter Hearns.
On Fri, Jul 8, 2016 at 2:09 PM, Keeping, Brent <Brent.Keeping2@gov.nl.ca> wrote:

Hi Sherry,

As discussed just now during the review of the release of your project, you will need to include a request for gates in your application for Crown lands.

Peter Hearn is familiar with your project and so I suggest that he may be of help in walking you through the application process. Or perhaps he will direct you to the right contact.

I have copied him here.

Kind regards,

Brent

Brent Keeping
Environmental Scientist
Environmental Assessment Division
Dept. Environment and Conservation
St. John's, NL
Phone (709) 729-4223
Fax (709) 729-5518

Email: bkeeping@gov.nl.ca

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Sherry Dunsworth, M.Sc., P.Geo.
V.P. Exploration
Marathon Gold Corporation
P.O. Box 160,
Pasadena, NL, A0L 1K0
Tel: 1.709.686.0153
Cell: 1.709.686.2317
Fax: 1.709.686.2317

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Strowbridge, Kerry

From: Hears, Peter  
Sent: Monday, July 18, 2016 10:40 AM  
To: Mercer, Dave W  
Subject: FW: Released from Environmental Assessment - 1839 Valentine Lake Mineral Exploration & Access Rd.  
Attachment provided previously

Dave,

You may get a call from the company regarding the process to apply for the roads and gate locations. Attached is the EA info.

It should be from:
Sherry Dunsworth, M.Sc., P.Geo.  
V.P. Exploration  
Marathon Gold Corporation  
P.O. Box 160,  
Pasadena, NL, A0L 1K0  
Tel: 1.709.686.0153  
Cell: 1.709.686.2317  
Fax: 1.709.686.2317  
Email: @mail.com

Peter

From: Keeping, Brent  
Sent: Thursday, July 07, 2016 9:11 AM  
To: Angelopoulos, John; Barnes, Janice; CEAA - Joseph Vigder; Clarke, Elaine; Crane, Gerald; Curran, Rick J.; Davis, Corrie; DFO Contact; Drake, Martha; FCR_Tracker (Dartmouth); Forsey, Rod; Ginn Melissa; Grzetic, Brenda; Harvey, Max; Health Canada; Hears, Peter; Hillyard, Rod; Hincheay, Stephen; Johnson, Darryl; Khan, Haseen; Locke, Robert C; Lynch, Wayne; Miller, Kirsten; Morrissey, John; Nunn, Ges; Otto, Rob; PNAD.References; Rees, Bobbi; Sheppard, Dion D.; Tapper, Jill; Transport Canada  
Cc: Abdel-Razek, Dr. Abdel-Zaheer; Bailey, Geoff; Brazil, Bernie; Bugden, Mark; Carey, Richard; Fenske, Jana; Flanagan, Jason; Forristall-Prim, Jennifer; Harvey, Dolores; Hickey, Barbara; Hoytes, Sean; Martin, Denis; Moore, Darren E.; Morgan, Tara; Oliver, John G.; Sutton, Robert; Tucker, Jocelyn; Walters, Tammy; Watkins, Michelle; Wight, Corey  
Subject: Released from Environmental Assessment - 1839 Valentine Lake Mineral Exploration & Access Rd.

EA Screening Committee,

Please see the attached Minister’s letter releasing the project subject to conditions.
Also attached are the agency comments received during the review.

Thank you,

From: EA Project Comments  
Sent: Thursday, April 21, 2016 12:22 PM  
To: Angelopoulos, John; Barnes, Janice; CEAA - Joseph Vigder; Clarke, Elaine; Crane, Gerald; Curran, Rick J.; Davis, Corrie; DFO Contact; Drake, Martha; EA Project Comments; FCR_Tracker (Dartmouth); Forsey, Rod; Ginn Melissa; Grzetic, Brenda; Harvey, Max; Health Canada; Hears, Peter; Hillyard, Rod; Hincheay, Stephen; Johnson, Darryl; Khan,
Please find attached comment forms for Registration # 1839

Registration #: 1839

Title of Project: Valentine Lake Mineral Exploration & Access Rd.

Proponent: Marathon Gold Corporation

Opinion Request Forms due: May 12, 2016

Please submit Opinion Request Forms (preferably electronically) and comments (as a word file) to EA_Project_Comments@gov.nl.ca on or before the deadline.

The EA Coordinator for this project is Brent Keeping (bkeeping@gov.nl.ca or 729-4223).


Thank you.
Also, all of the referrals would already be completed through the EA process, so it should be relatively quick.

From: Keeping, Brent
Sent: Monday, June 20, 2016 12:39 PM
To: Hearns, Peter

Simple enough. I think that will work.
Thanks.

---

From: Hearns, Peter
Sent: Monday, June 20, 2016 12:37 PM
To: Keeping, Brent

- Upon review it has been determined there are a number of gates indicated in this submission. Gates are not permitted on roads located on Crown lands without the permission of the Minister responsible for the Lands Act.
- New access roads on Crown lands require submission of a Crown lands application and approval to construct. The applicant should contact the Regional Lands Office in Gander regarding the Crown lands application process.
- Should the applicant require gating or exclusive access for any reason, this must be indicated on the Crown lands application form.

This work?

---

From: Keeping, Brent
Sent: Monday, June 20, 2016 9:46 AM
To: Hearns, Peter

Hi Peter,

Following up on our conversation late last week. Would you be able to provide some text that I could insert into the agency comments that describes what the proponent must do to obtain permission from your minister to use gates on the roads please? As well as the contact information if available? It would be good advice for them and would allay potential concern from my side when the file is in for review and approval.

Feel free to call to discuss.

Thanks,

Brent
Attached are the Municipal Affairs comments for EA 1839

Please find attached comment forms for Registration # 1839

Registration #: 1839

Title of Project: Valentine Lake Mineral Exploration & Access Rd.

Proponent: Marathon Gold Corporation

Opinion Request Forms due: May 12, 2016

Please submit Opinion Request Forms (preferably electronically) and comments (as a word file) to EA_Project_Comments@gov.nl.ca on or before the deadline.

The EA Coordinator for this project is Brent Keeping (bkeeping@gov.nl.ca or 729-4223).


Thank you.
Hi Peter,

There are no concerns with the project as a whole, but there are a number of gates indicated on their mapping. The gates are not permitted on roads located on Crown land.

Regards,

Dave Mercer
Land Management Specialist

Dept. of Municipal Affairs
Crown Lands Administration Division
Government of Newfoundland and Labrador
P.O. Box 2222
Gander, NL A1V 2N9
T: (709) 256-1407, F: (709) 256-1095
E: davemercer@gov.nl.ca

From: Hearns, Peter
Sent: Monday, May 02, 2016 3:11 PM
To: Mercer, Dave W

Please note on the maps that they have identified Gates.

I would think that Crown lands applications for the access roads... although it does fall on the Charter Lands and some might be in the Reid Lot 229

From: Hearns, Peter
Sent: Monday, May 02, 2016 2:36 PM
To: Mercer, Dave W

Dave,

The link to the EA is below. Appendix D has the maps. Any concerns? Looks like some new trails and still using their Temporary Camp (138262).

Thanks,

Peter

From: EA Project Comments
Sent: Thursday, April 21, 2016 12:22 PM
To: Angelopoulos, John; Barnes, Janice; CEAA - Joseph Vigder; Clarke, Elaine; Crane, Gerald; Curran, Rick J.; Davis, Corrie; DFO Contact; Drake, Martha; EA Project Comments; FCR_Tracker (Dartmouth); Forsey, Rod; Ginn Melissa; Grzetic, Brenda; Harvey, Max; Health Canada; Hearns, Peter; Hillyard, Rod; Hinchey, Stephen; Johnson, Darryl; Khan,
Please find attached comment forms for Registration # 1839

Registration #: 1839

Title of Project: Valentine Lake Mineral Exploration & Access Rd.

Proponent: Marathon Gold Corporation

Opinion Request Forms due: May 12, 2016

Please submit Opinion Request Forms (preferably electronically) and comments (as a word file) to EA_Project_Comments@gov.nl.ca on or before the deadline.

The EA Coordinator for this project is Brent Keeping (bkeeping@gov.nl.ca or 729-4223).


Thank you.
Field Analysis Report for 150214

Background: Approximately 80 km southwest of the community of Millertown is the Marathon Gold mine site. The company has placed a number of gates and constructed roads at drill sites to keep out the general public and hunters. The company has submitted a Crown Lands application (150214) for the six roads and gates to the sites but the application does not include the main gate.

On December 21, 2016, Marathon Gold Corporation was issued a removal notice for six gates. At the time, Crown Lands was not aware that the seventh gate existed.

On site Findings: There are seven gates on site, including the main gate for the camp, approximately one kilometer back the road. The first gate is about thirteen kms back the road.

The first three gates all lead to an interconnected drill site. Gates four, five and six lead to sites that have been trenched. The seventh gate, as mentioned is on the main road.

Photos:

Gate 1
Seven gates on site.
Findings: The first six gates are restricting access to drill sites on roads built by the company. The seventh gate is the only one that is blocking access to a preexisting road. The company feels it is necessary because of the presence of hunters and security at the camp.

The company maintains that they have been advised by OHS and the Department of Natural Resources, as well as in their Environmental Assessment approval, to erect the gates.

Recommendations:
Lands Branch  
Central Regional Lands Office  

APR 25, 2017  

Marathon Gold Corporation  

Dear Sir/Madam:

RE: APPLICATION NO: 150214  
TYPE: Permission Letter  
PURPOSE: Access Roads  
LOCATION: Valentine Lake Area  

Permission to construct access roads on Crown lands as shown on Schedule A attached is hereby given subject always to the following conditions:

1. This Permission is issued to Marathon Gold Corporation (hereinafter "Marathon") on an exclusive use basis for the areas where new construction has occurred and where five (5) gates have been erected all as indicated on the attached Schedule "A" and non-exclusive use for pre-existing access routes, on which the erection of one (1) gate is permitted, as outlined on the attached Schedule "A". This condition may be revoked or amended at the discretion of the Minister of Fisheries and Land Resources upon reasonable notice to Marathon.

2. Marathon shall be solely responsible for the erection and maintenance of all safety signage, public notification of the existence of all structures that may impede access, and ensuring that all such signage and structures are constructed to a standard that shall not present a risk to the health and safety of the general public.

3. Marathon must provide the Forestry Services Branch of the Department of Fisheries and Land Resources with keys or codes to the gates to allow access for fire protection and inspection purposes.

4. This Permission is issued for a term of five (5) years from the 25th day of April, 2017 and may be extended at the sole discretion of the Minister, upon application by Marathon within six (6) months of the expiry date.
5. This Permission may be amended at the sole discretion of the Minister upon application by Marathon and subject to those terms and conditions as the Minister may prescribe.

6. This Permission does not permit you to enter upon private land or to dispute claims to land.

7. This Permission does not guarantee that all lands identified are Crown lands. It is your responsibility to obtain permission from any private land owners.

8. The area of Crown lands to be occupied must not exceed 15.84 hectares with a width not to exceed 5 metres and a length not to exceed 31,680 metres, as shown on the attached supplemental mapping.

9. This Permission does not waive the required consent of, or permission from, any other Government Departments and Agencies.

10. All waste materials generated from the use of the subject land must be removed and disposed of as outlined under Conditions (Waste:) attached from Service NL (Government Service Centre).

11. Any construction located within the 15 metre wide reservation of any water body must have prior approval from Fisheries Oceans Canada and the Water Resources Management Division of the Department of Municipal Affairs and Environment.

12. All costs associated with the construction, maintenance and repair of the access roads, whenever incurred shall remain the sole responsibility of Marathon.

13. The subject land shall be held under and subject to all regulations and provisions of the Lands Act and to such statutes and regulations as are now in force or which may at anytime hereafter be made by law for lands within the Province of Newfoundland and Labrador;

14. The Minister of Fisheries and Land Resources has the right to cancel this Permission immediately if at any time the mineral licences (or subsequently issued mining leases) held by Marathon are terminated, or on a default by Marathon under this Permission, if such default is not cured within sixty (60) days of notice of such default by the Minister. The Crown will accept no liability for improvements carried out on the subject land if this Permission is cancelled.

15. You must contact the nearest Forestry Office concerning the cutting or clearing of any timber from the subject land.

16. Marathon shall indemnify and save harmless the Crown against any loss, cost or damage resulting directly from Marathon’s use or occupation of the access roads described in this Permission.

17. Marathon shall be liable for injury or loss to person or property which results from Marathon’s fault, negligence or act or omission by fault or negligence, or an act or omission by fault or negligence by Marathon’s employees, subcontractors, agents or assigns, in the performance or non-performance of any of their or Marathon’s obligations respecting its use or occupation of the access roads described in this Permission and specifically the erection of any gates (exclusive use only roads) placed by Marathon on or near the exploration operations.

Fraser Mall, P.O. Box 2222, Gander, NL A1V 2N6, Telephone (709) 256-3400, Facsimile (709) 256-1095

294
18. This Permission does not convey the right to extract any minerals including limestone, granite, slate, marble, gypsum, mard, clay, gravel, peat, coal, naturally occurring gas or petroleum, or salt from or under the subject land.

19. The access roads shall be all weather gravel roads.

20. This Permission for the construction of access roads is subject to the conditions as defined in Environmental Assessment Registration number 1839 on file with the Environmental Assessment Division of the Department of Municipal Affairs and Environment which was released in July, 2016 and conditions stipulated within this application’s approval notice. Rehabilitation of roads is required when operations cease in accordance with a Decommissioning Strategy approved by the Minister of Municipal Affairs and Environment, as stated in Environmental Assessment Registration #1839.

21. This Permission shall not come into effect until both copies of this Permission have been signed by Marathon in the space provided, sent back to Crown Lands Administration Division and a copy returned to Marathon from the Crown Lands Administration Division.

SEE ATTACHED CONDITION(S)

Regional Lands Manager

Agreement of MARATHON GOLD CORPORATION:

MARATHON GOLD CORPORATION hereby accepts all of the terms and conditions of this Permission to Construct on Crown lands dated April 25, 2017.

MARATHON GOLD CORPORATION

DATE

Attachments

cc: GSC/Corn Brook
    Wildlife Division
    Tourism & Culture Branch
    Forestry Services Branch (Springdale & St. George’s)
    Mineral Lands Division
    Service NL (Occupational Health & Safety)
CONDITION(S)

SERVICE NL (GOVERNMENT SERVICE CENTRE)

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

Environmental Protection:

1. The extent of land clearing and grubbing should be restricted such that naturally vegetated buffers between the site and surrounding properties and thoroughfares are maintained.

2. Any existing tree screen concealing the operation from public view is to be maintained.

3. Access to the site must be approved by Department of Transportation and Works.

4. 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 Service NL and/or the Department of Environment and Climate Change.

Waste:

1. All waste material shall be considered, prior to disposal, for reuse, resale or recycling.

2. All waste material generated during the construction and operation of the facility is to be placed in suitable refuse containers and removed to an approved waste disposal site on a weekly basis, with the approval of Service NL and the site owner/operator.

3. Derelict vehicles, scrapped equipment and other debris are not to be stored on site. Such material is to be removed to an approved waste disposal site or scrap yard on a regular basis, with the approval of the site owner/operator.

4. The site is to be kept neat and tidy at all times.

5. Any cut brush should be chopped/shredded, and may be burnt on-site with the approval of the Forestry and Agrifoods Agency or removed to an approved waste disposal site with the permission of the owner/operator of the waste disposal site.

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

Gasoline and Associated Products

1. All fuel storage tank systems, other than those connected to a heating appliance of capacity of 2,500 litres or less, and any proposed fuel cache will require approval by Service NL prior to installation.

2. Storage of Used Oil must be in compliance with the Used Oil Control Regulations.
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 cleanup 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 Environmental Emergencies Line at 772-2083 or 1-800-563-9089.

**DEPARTMENT OF FISHERIES AND LAND RESOURCES – WILDLIFE DIVISION**

The Wildlife Division advises applicant to operate under established regulations and guidelines with respect to wildlife and their habitats (e.g. nesting birds, caribou, waterfowl, wetlands, inland fish, rare plants, riparian species) to minimize adverse impacts (Section 106 of the *Wild Life Regulations* under the *Wild Life Act* (O.C. 96-809)).

The proposed work falls within the current 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”.

The denning period for marten occurs from early April to the end of June. Disturbance to dens could result in negative impacts on survival or condition of young or denning females (Marten Recovery Plan). To help reduce any negative impacts on wildlife species, including marten, the Wildlife Division recommends that vegetation clearing or excessive noise be undertaken outside of the nesting, breeding and brood rearing period, which runs from early-April to mid-July.

Activities, disturbance and habitat destruction must be minimized as much as possible in order to avoid causing harm to individuals or degrading important marten habitat. Ground personnel are reminded to travel with caution within the area at all times.

Access Roads/ trails must be revegetated once abandoned.

The proposed takes part within a designated waterfowl area. The Wildlife Division recommends that a minimum 50 m naturally vegetated buffer be maintained along all waterbodies and wetlands to protect sensitive riparian and aquatic species, and their habitat.
DEPARTMENT OF TOURISM, CULTURE, INDUSTRY AND INNOVATION –
CULTURE AND HERITAGE DIVISION

- Tourism and Culture has concerns with the development of new access roads in areas used by outfitting businesses. It is recommended the proponent develop a decommissioning strategy for the proposed access roads once development has concluded. This was agreed to by the proponent in Environmental Assessment Reg.1839. Increased access into areas used by the outfitting industry results in crowding in angler and hunting experiences and negatively affects population of habitat and success rates.

Sec 40(1)
There are four outfitters in this area that the proponent must contact to mitigate conflict regarding the mineral exploration and access road developments in the area of Valentine Lake.

1. [Redacted] 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: [Redacted]@victoriaoutfitters.com, Website: www.victoriaoutfitters.com

Sec 40(1)
2. [Redacted] of Kinden's Quinn Lake Outfitters Ltd. (Quinn Lake Lodge), P.O. Box 787, 46 Centennial Drive, Lewisporte, NL, A0G 3A0, Tel: 709-535-8811/541-1340/1353, Fax: 709-535-1927, Email: info@kindensoutfitters.com, Website: www.kindensoutfitters.com

Sec 40(1)
3. [Redacted] of Notch Mountain Outfitters Inc. (Valentine Lake Lodge), P.O. Box 462, Buchans, NL, A0H 1G0, Tel: 709-672-3589/8607, Fax: 709-672-3843, Email: [Redacted]@hotmail.com, Website: www.notchmountainoutfitters.com

Sec 40(1)
4. [Redacted] of Caribou Cove Outfitters Ltd. (Moose Lodge), 468 Rocky Lake Drive, Bedford, NS, B4A 2T6, Tel: 902-209-0099, Fax: 902-455-0775, Email: fivestar@fivestarroofing.ns.ca, Website: www.foxharbouroutfitters.ca

FORESTRY SERVICES BRANCH
Gates will not be an impediment to future commercial timber harvesting operations.

The Newfoundland and Labrador Forest Services will be provided keys or codes to the gates so that we have access for fire protection and inspection purposes.

DEPARTMENT OF NATURAL RESOURCES – MINES BRANCH
The Mines Branch – in its mandate to facilitate the exercise of mineral rights, including the carrying out of mineral exploration upon mineral licences – supports the presence of gates because without them members of the public would have unrestricted access to exploration work sites where heavy machinery is operating and where ground is being excavated, whereas the presence of gates will go a long way toward ensuring that exploration work can proceed without interruption due to the unexpected arrival and presence of people and vehicles unrelated to the operation. The gates need to be highly visible and, for newly constructed or refurbished side roads, placed at the entrance to the side roads.
The application for permission is for the purpose of constructing access roads in support of a large, ongoing mineral exploration program carried out by Marathon Gold Corp. If the permission is to have a term of duration or be accompanied by the issuance of a licence to occupy then the following shall apply:

The Mines Branch requires that, with regard to duration and transferability, the licence (or permission) to occupy be considered attached to the mineral licences with which it overlaps (licences 10899M and 10943M held by Marathon Gold Corp.). Specifically, the licence (or permission) to occupy must contain conditions in the title document to the effect of the following:

1. Should mineral licence 10899M or 10943M or one of their descendants overlapping with a portion of the licence to occupy be transferred, that portion of the licence to occupy shall be transferred with it.

2. Should a portion of mineral licence 10899M or 10943M or one of their descendants overlapping with a portion of the licence to occupy be surrendered, then that portion of the licence to occupy shall be extinguished.

3. Should mineral licence 10899M or 10943M or one of their descendants overlapping with a portion of the licence to occupy be cancelled or expire, then that portion of the licence to occupy shall be extinguished.

- ‘Descendant’ refers to a mineral licence resulting from an original mineral licence being split, grouped, or partially surrendered. Descendant licences have new and unique licence numbers.

**SERVCE NL – OCCUPATIONAL HEALTH AND SAFETY**

All work is to be conducted in accordance with the Occupational Health and Safety Act and its Regulations. The development of all roads shall be in accordance with said regulations. The gates shall be properly delineated/marked and appropriate signage shall be installed warning the public of the gate and of potential workers who may be working in said areas.

**NOTE:** Under the Occupational Health and Safety Act, Section 4 states: An employer shall ensure, where it is reasonably practicable, the health, safety and welfare of his or her workers. Section 5, outlines more of specific duties of employers and their responsibility. Under the Occupational Health and Safety Regulations (2012) – Section 654 (protection of workings, pits and quarries) states: An employer shall ensure that a surface mine working or open face is securely fenced or otherwise protected against inadvertent entry by persons where: (a) the working constitutes a hazard by reason of its depth; (b) the approaches to and openings of the workings are not readily visible; or (c) the hazard caused by the workings is greater than the hazard caused by natural topographical features within 600 metres of the workings.

It is the employer’s duty – Marathon Gold Corporation to protect workers from potential hazards that they may face and to protect the public from any hazards created by them because of their work activity.
DEPARTMENT OF MUNICIPAL AND INTERGOVERNMENTAL AFFAIRS
Application for Renewal of Licence to Occupy 138262

APPLICANT: MARATHON GOLD CORPORATION

MAILING ADDRESS: C/O Sherry Butchart (V.P. Exploration) 200-12555 No. 2 Road, Richmond, BC, V6M 1B7
PO Box 160, President Point, NL, A0E 1K0

TELEPHONE NUMBER: Business: 4169575077 Home: [redacted]

LOCATION OF LICENCE:
Please indicate how you access this site: boat ___ ATV ___ snowmobile ___ walking ___ automobile ___ other, explain ___

Describe buildings and/or any other improvements that have been carried out on this parcel of land:

[Handwritten text: Explosive camp in existence since 2011 and the social application and ensuring temporary limits of occupancy.]

If the site is not developed, please give reasons. If you require an extended term beyond our (1) year please indicate below: ___

Date: [redacted] Signature: [redacted]

DEPARTMENT OF INTERGOVERNMENTAL AFFAIRS
LICENSE NO: 138262
PURPOSE: Temporary Use of Camp
FILE No: 2017332
FOLDER 8267: 09278
PROPERTY RES: 101718
RECEIPT No: ___ RECEIPT DATE: ___ RECEIPT AMOUNT: ___
APPROVED: ___ REFUSED: ___
COMMENTS: ___

[Redacted text: [AUTHORISED LICENSING OFFICER]]

Peter McI. Ian A. NL, A0E 2016, Telephone (709) 256-1100, Facsimile (709) 256-1615
Hi Hilary,

I have attached a scan of the application re: licence # 138262.

You had mentioned including a request for a longer time period than 1 year but there is no place on the application form to add such a request.

Marathon Gold Corporation would like to request a 5-year permit to occupy as our exploration is advanced and ongoing as we build gold resources at the Valentine exploration site.

Please let me know what fees are due.

Thank you, Sherry

Sherry Dunsworth, M.Sc., P.Geo.
V.P. Exploration
Marathon Gold Corporation
P.O.Box 160,
Pasadena, NL, A0L 1K0
Tel: 1.709.686.0153
Cell: 1.
Fax: 1.709.686.2317
Sherry.Dunsworth@gmail.com
From: Coates, Hilary
To: "Sherry Dunsworth"
Subject: RE: Application form - Marathon Gold

Tuesday, October 06, 2015 9:13 AM

Good Morning,

Thank you for the renewal application. I will ensure the Licence is renewed for a 5 year term commencing on the last expiry date (June 2014). You will receive documents to sign to this regard.

Also, now that we know Marathon Gold will be occupying the site for longer than the original 1 year term, I have contacted the Accounts Division to have Marathon Gold set-up to be sent out yearly Invoicing/billing. So the payment you made last Dec 2014 will go on this newly created account (the account will be back-dated to the June 2013 date of issuance).

The first yearly reoccurring invoice you will receive will likely be in June 2016. As the site is currently occupied there is a $100.00 balance to be paid. I believe Accounts will send the June 2015 invoice to you once the account has been set-up. Thank you.

Hilary Coates, Lands Officer II
Dept. of Municipal and Intergovernmental Affairs. Crown Lands Division, Gander, NL
Ph: (709)-256-1000, Ph: (709)-256-1095

---

From: Sherry Dunsworth [mailto:sherrydunsworth@gmail.com]
Sent: Monday, October 05, 2015 4:56 PM
To: Coates, Hilary
Subject: Application form - Marathon Gold

Hi Hilary,

I have attached a scan of the application re: licence # 138262.

You had mentioned including a request for a longer time period than 1 year but there is no place on the application form to add such a request.

Marathon Gold Corporation would like to request a 5-year permit to occupy as our exploration is advanced and ongoing as we build gold resources at the Valentine exploration site.

Please let me know what fees are due.

Thank you, Sherry

---
Sherry Dunsworth, M.Sc., P.Geo.
V.P. Exploration
Carrie,  

I have spoke with Marathon Gold company and they will be renewing Licence# 138262 for 5 years commencing on June 10, 2014 (back-dated). Although this is a temp work camp, they are going to be long-term.

May you please set up Marathon Gold with an account to be invoiced each year. The rental payment below can then be credited into the account. Would you like a Customer Maintenance form to this effect?

-Hillary

---

Hilary, I put this $100.00 in Misc Permits for Crownlands: [redacted] When we get funds for Temporary Work Camps, we do not set up the customer in Oracle. If you want to refund you can use this distribution center.

Carrie Poole
Accounting Clerk II
Dept. of Municipal Affairs
Crown Lands A/R
Ph: 729-3161
Fax: 729-5555
cpoole@gov.nl.ca

---

Hi Carrie,

Title 138262 was not set-up in Oracle as it was a one year permit that expired. I received a yearly payment for the expired title in Dec 2014 (as per attached). I don't know why the title holders paid a yearly rent for a title that they did not receive an invoice for...but anytime, ..Do you know where this payment was applied? Can it be refunded?

-Hillary

Sec 35 (1)(b)

Sec 40(1)
Hi Hilary,

I have attached the receipt from the payment for $100 made last Dec 15, 2014.

I will look for form in the mail and request a 5 year renewal.

Thank you, Sherry
GOVERNMENT OF NEWFOUNDLAND AND LABRADOR
DEPT. OF ENVIRONMENT AND CONSERVATION

DIVISION: Crown Lands
RECEIVED FROM: Sherry D'Arcy (for Marathon Gold Corp)
THE SUM OF: One Hundred Fifty Dollars
IN PAYMENT OF:

INVOICE NO.:
CUSTOMER NO.:
H.S.T.:
CASH:

CHEQUE: 128-2102

TOTAL $150.00

APPROVED:

CARD TYPE: VISA
CARD NO.:
EXP. DATE:
PURCHASE TOTAL: $100.00

310
Newfoundland Labrador
Environment and Conservation
APPLICATION FOR CROWN LANDS

FOR DEPARTMENT USE ONLY

APPLICATION NO. 138242
FILE NO. 4607857
DATE REGISTERED Feb 22, 2011

APPLICATION INFORMATION

MAIN ADDRESS
360 Aug. St., St. John's, N.L.

OFFICIAL NAME
Alcantara Ltd., Corporation

DATE OF INQUIRY Oct 15, 2010

TOTAL PERIOD OF EXISTENCE
30 Years

APPLICANT IS AN EMPLOYEE OF THE DEPARTMENT OF ENVIRONMENT AND CONSERVATION
YES [ ] NO [ ]

APPLICANT APPLIED TO OR SECURED LAND FROM THE GOVERNMENT
YES [ ] NO [ ]

PROPOSED TENURE AND USE

TYPE OF APPLICATION
 premises [ ] licence to occupy [ ]

LAND USE
residence [ ] cottage [ ] agriculture [ ] commercial [ ]

GOVERNMENT NUCLEAR PROJECT
NO [ ]

PROJECTS OR INSTALLATIONS [ ]

EXISTING DEVELOPMENT

Manual Exploration Camp - located at the end of
Victoria Falls, located on

SHOVELS AND SPACE ALLOWED TO THE RIGHTS OF APPLICATION
50' x 50' MUNICIPAL WATER [ ] MUNICIPAL SEWER MUNICIPAL SEWER [ ] MUNICIPAL SEWER [ ]

Sec 40(1)
LAND DESCRIPTION

THE LAND IS LOCATED IN THE MUNICIPAL DISTRICT OF

ADDRESS OF THE LAND

APPROXIMATE DIMENSIONS OF THE LAND

MEASURE TO DISTANCE IN METERS

IS THE ACCESS ACCESSED BY ROADS?

IF HOUSEHOLD ENSO Y NO

IF THERE ARE ACCESS POINTS ON THE APPROXIMATE LENGTH OF THE ROAD

IF THERE ARE NO ROAD ACCESS, LOCATION OF ACCESS ROUTE MUST BE MARKED ON THE MAP ATTACHED TO THIS APPLICATION AND ACCESSES BY NAME MUST BE IN ACCORDANCE WITH A COORDINATES METHOD.

IF THE TITLE OF PROPERTY IS GOVERNMENT, MUNICIPAL, LOCAL, OR ENVIRONMENTAL

IF THERE IS NO OCCUPATION COMMENTED, AND OCCUPIED AND NAME OF PERSON WHO OCCUPIED OR OCCUPIED THE LAND

DESCRIPTION OF LAND

Please Note: When your application is accepted by this Department you are required to identify the site in the field by clearly marking your corner posts. If there is a discrepancy between the area marked in the field and the area indicated on the map, the latter shall prevail.

Sketch the land applied for showing distances to prominent natural features such as buildings, fences, roads, boundaries. Map must also be attached.

SOUTHERN BOUNDARY

SOUTHERN SOWN BY

SOUTHERN SOWN BY

SOUTHERN SOWN BY

PLEASE NOTE: IT IS THE POLICY OF THE CROWN LANDS DEPARTMENT TO ACCEPT APPLICATIONS ON A FIRST COME, FIRST SERVED BASIS. APPLICATIONS MUST BE FULLY COMPLETED, WITH A MAP SHOWING THE ROAD LOCATION OF THE LAND APPLIED FOR TOGETHER WITH THE APPLICATION FEES. THE APPROVED MUNICIPAL, RECOMMENDATION FORM FROM COUNCIL, IF APPLICABLE, MUST ALSO BE ATTACHED. ONLY THEN WILL THE APPLICATION BE ACCEPTED AND DEEMED REMITTANCE OF THE DEPARTMENT.
APPLICANT OF APPLICANT (to be read carefully)

I, [Applicant's Name], do hereby make oath and declare as follows:

(a) The information contained in this application is true and correct to the best of my knowledge and belief.
(b) I have inspected the land applied for and have found no evidence of occupation in terms of Sec. 8 and/or Sec. 7 on page 1, where applicable.
(c) I am not aware of any adverse claim to the land applied for by any person(s).
(d) I recognize and accept that I am solely responsible for correctly identifying the parcel of land that is the subject of this application.
(e) I fully understand that acceptance of this application by the Department does not give me any rights or privileges in relation to the land under application.
(f) I FULLY UNDERSTAND THAT THE LAND IS NOT TO BE OCCUPIED UNTIL I RECEIVE A FULLY EXECUTED TITLE DOCUMENT.
(g) I FULLY UNDERSTAND THAT UNDER SECTION 14 OF THE LANDS ACT, THE MINISTER OF GOVERNMENT SERVICES AND LANDS MAY CANCEL OR REFUSE THIS APPLICATION AT HIS OR HER DISCRETION AT ANY TIME PRIOR TO THE DELIVERY OF A FULLY EXECUTED TITLE DOCUMENT.

(orn before me)

[Signature]

[Printed Name]

[Date]

[Official Acknowledging Oath]

[Commissioner for Oaths]

[Chargr or many orders are to be inserted here]

[Exchequer Account]

My commission expires on December 31, 2012

NOTE: A non-refundable processing fee of $100.00 must accompany this application.

Sec 40(1)

Sec 40(1)
## Special Conditions of Approval:

<table>
<thead>
<tr>
<th>Date</th>
<th>Regional Lands Manager</th>
</tr>
</thead>
</table>

<table>
<thead>
<tr>
<th>Special Title Conditions:</th>
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<tbody>
<tr>
<td>Date</td>
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<tr>
<td>------</td>
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</tbody>
</table>
May 2, 2013

MARATHON GOLD CORPORATION
C/O Sherry Dunsarway (V.P. Exploration)
330 Bay St. Suite 800
Toronto ON
M5H 2T7

Dear Sir/Madam:

<table>
<thead>
<tr>
<th>RR:</th>
<th>APPLICATION NO:</th>
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<tbody>
<tr>
<td></td>
<td>138263</td>
</tr>
<tr>
<td>TYPE:</td>
<td>Licence</td>
</tr>
<tr>
<td>PURPOSE:</td>
<td>Temporary Work Camps</td>
</tr>
<tr>
<td>LOCATION:</td>
<td>Victoria Lake</td>
</tr>
<tr>
<td>RENTAL FEE:</td>
<td>$100.00 (plus HST)</td>
</tr>
</tbody>
</table>

A correction was necessary in the documents previously sent to you for signature. Your application has been approved for a Licence to Occupy for a term of 1 year(s).

Enclosed are duplicate draft licence documents that must be signed and dated by you in the spaces provided.

Both signed documents must be returned to this Department together with your annual rental of $100 and the document preparation fee of $200.00. Your cheque or money order should be made payable to the Newfoundland Lands Agency. A pre-addressed return envelope is included for your convenience. These are legal documents and must not be defaced or altered in any way. Failure to return both documents and monies owed within ninety (90) days of the date on which you receive this letter will result in the cancellation of your application.

A copy of the Licence will be forwarded to you upon registration in the Registry of Crown Titles.

Please note that the land is not to be occupied until you receive a fully executed title document.

Should you require further information, please contact this office at the address listed.

Yours truly,

REGIONAL LANDS MANAGER

Enclosures

P.O. Box 2222, St. John's, NL A1B 2N9. Telephone (709) 729-1400, Facsimile (709) 729-1195.
CONDITIONS

SERVICE NL - GOVERNMENT SERVICE CENTRE

The Government Service Centre would have no objection to this proposal provided the following stipulations are adhered to:

Water and Sewer

1. Approved subject to the applicant submitting plans and receiving approval for the proposed water and sewerage system. Systems in excess of 4546 litres must be in compliance with the Environment Control Water and Sewerage Regulations and the Guidelines for the Design, Construction and Operation of Water and Sewerage Systems and require certified engineering drawings and specifications. Systems less than 4546 litres must be in accordance with the Standards Regulations and Standards of Acceptable Practice for On-Site Sewage Disposal System and prepared by an approved designer.

General

1. Any alteration of a natural water body, work within 15 metres of a water body, or development within a protected water supply area will require prior approval by the Water Resources Division of the Department of Environment and Conservation. Alteration of a water body may include culvert installations, stream crossings, embankments, fillings, or bridge, dam, and weir construction.

2. If at any time this operation is deemed to be creating environmental problems, corrective action will have to be taken by the operations, as directed by the Government Service Centre and/or the Department of Environment and Conservation.

3. Applications must be made for Fire Life Safety (Application for Approval of Plan Form) and Building Accessibility (Application for Building Accessibility Registration Form) review/approvals.

4. Development must not extend within 200 m of an established water body without prior registration and release under the Environment Assessment Act, Department of Environment and Conservation, Environmental Assessment Division.

5. Upon closure of the operation, the site must be re-established to the satisfaction of the Department. All materials, equipment, buildings and waste to be removed from the site and disposed of in accordance with Part IV of the Environment Protection Act.

Waste

1. All waste materials, generated during the construction and operation of the facility, shall be considered, prior to disposal, for reuse, reclamation, or recycling.

2. Other waste material generated on-site is to be placed in suitable refuse containers and removed to an approved waste disposal site on a weekly basis, with the approval of the site operator. Refuse containers shall be present at all active areas for use by construction crews and employees.

3. Decontaminated scrap, equipment and other debris are not to be stored on-site. Such material is to be removed to an approved waste disposal site or scrap yard on a regular basis, with the approval of the site operator.

4. The site is to be kept neat and tidy at all times.

5. Any cut brush should be chip/per/gradually burned on-site or removed to an approved waste disposal site for burning with the approval of the Department of Natural Resources and/or the on-site operator of the waste disposal site.

6. Tires and used oil is not to be used to aid in the burning of brush.

FRANK MILL, P.O. Box 2222, Gander, NL A1V 2N0. Telephone (709) 256-1400, Facciobindi (709) 256-1006

317
Gasoline and Associated Products

1. All drum-based fuel storage facilities are to comply with the Provincial Environmental Guidelines For Drum-Based Petroleum Products Storage and Operations. Approval is required from Government Service Centre prior to installation of facilities exceeding ten drums.

2. All fuel storage tank systems 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 registration by the Government Service Centre, prior to installation.

3. All fuel storage tank systems connected to a heating appliance of a capacity of 2,500 litres or less must comply with the Heating Oil Storage Tank System Regulations.

4. The storage, handling and disposal of used oil and lubricants must comply with the Used Oil Control Regulations, NLR 61862.

5. Poets dredged from service bays or other areas handling used or waste oils are to be removed through an oil water separator to remove oily waste before being discharged. Plans and specifications must be submitted for review and approved by Government Service Centre prior to installation.

6. In fuel storage and handling locations 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 function on-site. Personnel working on the project should be knowledgeable about response procedures. The spill response plan should consider developing a contingency plan specific to the proposed undertaking to enable a quick and effective response to spill events.

7. Any spill or leak of gasoline or associated product is to be reported immediately to the Department of Government Services by calling the Canadian Coast Guard Environmental Emergency line at 1-800-553-9080.

8. All spills or leaks of petroleum product must be remediated to the satisfaction of the Government Service Centre and the Department of Environment and Conservation.