



# Tenure Holder Communications and Mitigation Annual Report

March 31, 2025



## **Tenure Holder Communications** and Mitigation Annual Report

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## **Acronyms and Abbreviations**

Artemis Gold Inc., owner/operator of BW Gold Mine

BC British Columbia

BC EAO British Columbia Environmental Assessment Office

BW Gold BW Gold LTD.

CEO Chief Executive Officer
COO Chief Operating Officer
CM Construction Manager
COO Chief Operating Officer
DS Decision Statement

EA Environmental Assessment

EAC Environmental Assessment Certificate

EAO Environmental Assessment Office
EIS Environmental Impact Statement

EM Environmental Manager

EMS Environmental Management System

EPCM Engineering, Procurement and Construction Management

FOR Ministry of Forests (formerly Forests, Lands, Natural Resource Operations and

Rural Development)

FSR Forest Service Road
GM General Manager

GTC Guide Territory Certificate

ha Hectares

LRMP Land and Resource Management Plan

NVMP Noise and Vibration Effects Monitoring and Mitigation Plan

SPNM Semi-Primitive Non-Motorised

THCMP Tenure Holder Communications and Mitigation Plan

WLRS Ministry of Water, Land and Resource Stewardship

VAMP Vanderhoof Access Management Plan

VP Vice President

### 1.0 Introduction

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

The Project is presently accessed via the Kluskus Forest Service Road (FSR), the Kluskus-Ootsa FSR and an exploration access road, that connects to the Kluskus-Ootsa FSR at km 142. The Kluskus FSR joins Highway 16 approximately 10 km west of Vanderhoof. A new, approximately 13.8 km road (Mine Access Road; MAR) will be built to replace the existing exploration access road, which will be decommissioned. The planned new access is at km 124.5. The driving time from Vanderhoof to the mine site takes roughly 2.5 to 3 hours.

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

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

Project construction is anticipated to take two years. Mine development is currently planned to be phased with an initial milling capacity of 15,000 tonnes per day (t/d) or 5.5 million tonnes per annum (Mtpa) for the first five years of operation. After the first five years, the milling capacity will increase to 33,000 t/d or 12 Mtpa for the next five-years, and to 55,000 t/d or 20 Mtpa in Year 11 until the end of the 23-year mine life. The Closure phase is from Year +24 to approximately Year +45, ending when the Open Pit has filled to the target closure level and the TSF is allowed to passively discharge to Davidson Creek via a closure spillway. Post-closure phase begins in Year +46.

Construction activities at the Mine initiated in September 2022 and continued through 2024. Operations are anticipated to begin in 2025.

BW Gold received its Mines Act permit for the Mine, issued by the Ministry of Energy, Mines and Low Carbon Innovation on March 9, 2022. Authorizations required from the Ministry of Forests and the Ministry of Transportation to support clearing and access activities associated with the transmission line were issued throughout 2023.

A list of major authorizations issued to BW Gold is below in Table 1. This list includes *Mines Act* Permit M-246 (M-246), which was issued in March 2023, with an amendment in October 2024. This authorization has not been transferred or re-assigned since its issuance.

**Table 1 Major Project Authorizations** 

Authorizing Legislation	Authorization (Issue Date)	Issue Date	Purpose
	Permit M-246 Major Works	1. March 9, 2023 2. Amend ed Octobe	<ol> <li>Approves Blackwater Major Works within Permitted Mine Area, encompassing 4,296.2 ha.</li> <li>Approving Membrane Water Treatment Plant Startup Delay</li> </ol>

Mines Act		r 30,	
		2024	
	MX-13-319** NoW 2017-01	September 14, 2005	Authorizes access roads, trails, helipads, exploration surface drilling (extended to December 31, 2024).
	MX-13-319, NoW Auth 2022-02	November 15, 2022	Authorizes geophysical survey lines, exploration trail, exploration surface drilling on west side of project area (November 15, 2024)
	MX-13-319, NoW Auth 2018-01	August 3, 2018	Authorizes diamond drilling on ore zone for metallurgical assay purposes (August 2, 2023)
	MX-13-319, NoW Auth 2020-03	November 13, 2020	Authorizes RC drilling on ore zone for ore grade control study purposes (November 12, 2025)
Environmental Assessment Act	EAC #M19-01	June 21, 2019	Grants EAC for the Project as described in the CPD (Schedule A), subject to the conditions set out in the Table of Conditions (Schedule B).
Environmental	Permit 110602	June 24, 2021	Authorizes discharge of treated stormwater effluent to ground from early-stage construction activities.
Management Act	Permit 110650	1. May 3, 2023 2. Amend ed Septe mber 2024	<ol> <li>Authorizes discharge to air.</li> <li>Approving planned relocation of the Thermo Scientific Partisol-FRM Model 2025i-D PM sampler (Partisol) and passive air sampling systems (PASS) to the Operations Camp</li> </ol>
	Permit 110652	May 3, 2023	Authorizes discharge of effluent.
Heritage Conservation Act	Heritage Inspection Permit	September 14, 2021	Authorizes archaeological impact assessment inspections (December 21, 2025).
Angling and Scientific Collection Regulation, B.C. Reg 125/90	Scientific Fish Collection Permit for Major Fish Salvage for Mine Development (SM24-834556)	December 19, 2023	Authorized 2024 fish salvage required for mine development (December 31, 2024).
Impact Assessment Act	Environmental Assessment Decision Statement (DS)	April 15, 2019	Grants DS for the Project, subject to conditions.
Fisheries Act	Fisheries Act Section 35(2) Authorization (21-HPAC-01447)	June 30, 2023	Authorizes works, undertakings, and activities that are likely to result in impact to fish and fish habitat.
Metal Diamond Mine Effluent Regulations (MDMER)	Schedule 2 Amendment	June 8, 2023	List the upper reaches of Davidson Creek (development of the tailings storage facility) and Creek 661 (development of the ore stockpile) in Schedule 2 of the MDMER.

<sup>\*\*</sup> MX-13-177 has been replaced by MX-13-319 with the transfer of the Blackwater Project to the current proponent.

GTC 601039 fully encompasses the mine site area and a portion of the transmission line.

## 2.0 Purpose and Objectives

The purpose of the Tenure Holder Communication and Mitigation Plan (THCMP) is to address potential adverse effects of the Blackwater Gold Project on the business conducted under GTC 601039. The THCMP was developed in consultation with the Ministry of Water, Land and Resource Stewardship (WLRS) and the Tenure Holder and was approved by the Environmental Assessment Office on April 19, 2022. An updated version (C.1) was submitted on November 4, 2022.

The THCMP objectives are to identify measures to mitigate potential effects on the business conducted under GTC 601039 and monitor and report on the effectiveness of the mitigations.

Environmental Assessment Certificate (EAC) Condition 38 specifically states the THCMP must include at least the following:

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

This THCMP Annual Report fulfills clause (d) of EAC Condition 38 by reporting on the methods of monitoring and measuring the effectiveness of mitigations contained in Appendix D of the THCMP.

#### Context:

The EAC for the Blackwater Gold Project (the Project) was issued following a lengthy application review process which acknowledged that the Certified Project Description (CPD) would overlap approximately 10% of GTC 601039 and contains part of the Vanderhoof Access Management Plan (VAMP) Semi-Primitive Non-Motorized (SPNM) zone. The EAC and subsequent permits were issued with awareness of all overlapping tenures and specifically the potential impact to the Tenure Holder's operation within GTC 601039 and the mitigation opportunities.

Communication from the Tenure Holder indicates they believe the THCMP does not adequately represent their position, that 100% of the GTC territory cannot be used due to industrial activities and the consequential loss of the 'remote and wilderness' aesthetic on which their non-motorized guided hunts had previously occurred. The Tenure Holder continues to convey that their non-motorized hunting opportunities in the SPNM Davidson zone were a premium offering as part of their broader business operation which also offers motorized hunting in an adjoining GTC. The Tenure Holder believes the mitigations are neither effective nor appropriate as the Tenure Holder is not conducting their business operation in GTC. Despite the limited data indicating few hunts between 2009 and 2015 and the Tenure Holder's choice to not operate during prior and subsequent years, the Tenure Holder continues to argue

that the Certificate Holder is the primary cause of their inability to offer the premium experience core to their business operation in the GTC. The Tenure Holder has not acknowledged any other potential business use of the GTC. No alternatives to the premium experience have been expressly evaluated, including the ability to capitalize on motorized access between the shared GTCs.

As part of due diligence process, the Certificate Holder obtained public information to better understand the operations and potential extent of their alleged impact. The Certificate Holder also requested from the Tenure Holder, business operation and financial data typically retained by a BC Corporation as well as operational records to be kept by a professional guiding business.

Legal counsel from BW Gold and Batnuni met on May 22, 2024, to exchange information and explore mitigations. At that meeting BW Gold counsel indicated that BW Gold would be open to considering mitigations proposed by Batnuni should they provide them, but they have not responded to this offer or provided further information to inform discussions.

To-date, BW Gold's experience is that the Tenure Holder has been uninterested in exploring potential mitigations. The Tenure Holder's position has historically been and continues to be focussed on compensation. Documentation provided by the Tenure Holder has not demonstrated business operations in GTC 601039 nor impact to those operations.

## 3.0 Mitigation Measures

Mitigation Measures are identified in Appendix D of the THCMP. Two forms of reporting occur, based on whether the mitigation was specific to the Tenure Holder, or is a broader project level mitigation influencing the experience of all land users, which includes the Tenure Holder.

- Tenure Holder-specific mitigations (Group 1) are monitored to determine their effectiveness and are adaptively managed pursuant to EAC Condition 3 (Adaptive Management) and reported under the THCMP Annual Report; and
- 2. **Secondary mitigations** (Group 2) are contained in other listed environmental management plans or are commitments made during the environmental assessment review and were removed as of the March 2024 THCMP Annual Report.

Table 1 below reports on the actions and proposed adaptive management associated with the Tenure Holder-specific mitigations.

Going forward, Appendix A identifies where Group 1 mitigations have been closed and removed from the THCMP Annual Report.

Appendix C – Tenure Holder Communication and Monitoring Report, summarizes engagement and communication tracked from January 1 to December 31, 2024.

The 2023 Annual Report was provided to the Tenure Holder for information on March 28, 2024. The proposed updated THCMP Mitigation Appendix D arising from the Annual Report was provided to the Tenure Holder and WLRS (T. Larden) simultaneously on March 28, 2024.

WLRS provided comments immediately but unfortunately misunderstood the purpose of the Appendix D correspondence (that the mitigations were approved in the THCMP and there were no changes). The comments were general to the guide outfitting sector planning process and influences on business operations (ID 11a, b, c, d,e and ID 21) (WLRS, April).

The Tenure Holder provided comments on the 2023 Annual Report on April 27, 2024, which focused on their reasons for their lack of engagement in 2023 (Batnuni April). The Tenure Holder's reference to being "unable to operate in the GTC", is understood to refer to their (in)ability to offer guided hunts in the SPNM Davidson zone of the GTC in proximity of the CPD.

**Table 2 Tenure Holder Specific Mitigations and Status** 

Ten	Tenure Holder Specific Mitigations and Status				
ID	Proposed Mitigation	Status and Action	Adaptive Management		
1.	BW Gold will advise the Tenure Holder of the process required to receive notification of filed regulatory documents on the BW Gold Mine.	Closed	This mitigation has been closed and removed from the Annual Reporting process, consistent with the proposal contained in the 2023 Annual Report released March 2024. The mitigation is now reflected in Appendix B.		
2.	Contacts and appropriate communication methods for reaching the Tenure Holder in the event of an emergency, will be sought from the Tenure Holder and will be incorporated into the named Plans where notification is applicable.	Emergency response and contact methods for reaching the individual Batnuni guides in the field have been discussed since October 2021.  BW Gold requested emergency contact information on February 8, 2023. BW Gold was notified by the Tenure Holder in Q1 2025 that they obtained from WLRS under the Wildlife Act s.59.1(1) for a temporary or partial discontinuance of the use of GTC 601039 for guiding.  The Tenure Holder reported that they did not provide field emergency contact information because they are "unable to operate in the GTC due to the Project" (Batnuni April).  BW Gold responded to the Tenure Holder (BW Gold June) affirming that the Tenure Holder could potentially undertake a range of activities	Until the Certificate Holder is informed otherwise, the Certificate Holder will operate as though the Tenure Holder may be present or may plan to use any geographic location of GTC 601039.  This mitigation will be carried forward and BW Gold will continue to seek the Tenure Holder's emergency contact information.		

ID	Proposed Mitigation	Status and Action	Adaptive Management
	r reposed intigation	throughout the GTC other than guiding, including resource inventories and trail building and motorized guiding.	Adaptive management
7.	Invite the Tenure Holder to participate in the Access Management Working Group. Access maps will be available with information related to locks and access.	The AMWG was not active in 2024. The Tenure Holder opined on the AMWG and his inability to attend a meeting in 2023 (Batnuni April). BW Gold clarified (BW Gold, June) that the final July 12, 2024, AMWG meeting same-day time change was due to a flight delay of the facilitator. (BW Gold June). BW Gold retains the AMWG as an engagement tool if required. Success has been achieved by working directly with Indigenous Nations and Tenure Holders, and with shared road users and the Crown through the Stuart Nechako Road Safety Committee referenced in Mitigation 9.	BW Gold recommends that this mitigation be closed and that it be removed from the Annual Reporting process following submission of the March 31, 2025, annual report.
		Mechanisms are in place for the Tenure Holder to provide information to BW Gold regarding use of trails, and roads in the GTC. The purpose of the AMWG, as per the Terms of Reference, does not include responsibility of Crown permitted roads contrary to the Tenure Holders assertions.	
 9.	BW Gold to participate in the Stuart Nechako Road	BW Gold is a member of the Stuart	Implementation of this mitigation is

Ten	ure Holder Specific Mitigations and Status		
ID	Proposed Mitigation	Status and Action	Adaptive Management
	Safety Committee (formerly) Kluskus FSR industrial road users' group) over the mine life.	Nechako (SN) Road Safety Committee and the Kluskus Road Users Group. These committees allow BW Gold and other road users to discuss use, maintenance, and safety throughout the year.  A SN Road Safety meeting was held June 26, 2024, and was attended by BW Gold. Key topics included improvements to safety practices, road closures, traffic patterns and signage, expected FSR construction, calling procedures on Kluskus, speed enforcement generally, road maintenance and estimated traffic load volume from all road users on listed roads expected per day.  Kluskus Road User Group meetings between FOR, BW Gold, Sinclair Group and Canadian Forest Products representatives occurred October 16, 2024, and again on February 3, 2025, to discuss winter road use, maintenance, and safety on the Kluskus.	ongoing and supports road safety and shared road use planning. While BW Gold holds a seat at this table, dialogue is not specific to this Tenure Holder and their use of the GTC. BW Gold recommends that this mitigation be closed and that it be removed from the annual reporting process following submission of the March 31, 2025, annual report.
11.	Establish a two-way communication process to share information and reduce Mine noise and interactions where possible. Include notifications related to off-site works, including the Transmission Line.	More than 15 letters and emails were sent in 2024 regarding field activities on- and off-site and related to mine and transmission line construction schedules and notifications under the Noise and Vibration Management Plan	Implementation of this mitigation is ongoing.

Tenu	Tenure Holder Specific Mitigations and Status		
ID	Proposed Mitigation	Status and Action	Adaptive Management
		and Community Effects Monitoring and Mitigation Plan related to potential noise.  BW Gold received limited responses from the Tenure Holder which are reflected in Appendix C, Tenure Holder Communication and Monitoring Report	
11a	BW Gold will seek to receive information from the Tenure Holder regarding their activity and use of specific areas within the GTC in April – May and September – October. BW Gold understands that hunts may be booked for years in advance, and in that spirit, advising BW Gold of scheduled Tenure Holder planned hunts as early as possible each year, and ideally 2 times annually will facilitate dialogue about BW Gold planned activities outside the mine site.	The Certificate Holder provided information on field activities, location and schedules for work through 12 letters in 2024. This included ongoing construction and operations activity in areas of shared land tenure (approximately 10% of the GTC). It also included periodic environmental monitoring activities over other parts of the GTC.  The Tenure Holder provided limited	Implementation of this mitigation is ongoing.
		responses indicating they were not using any part of the GTC.	
		For clarification, this mitigation was designed to collect general use and location information to inform BW Gold's field work plans outside of the mine site and assist in understanding potential activities in areas where there is overlapping tenure.	
		The mine is permitted to operate 24/7/365 and forms approximately 10% of the GTC. The mitigation is not directed at mine site activities.	

Tenu	Tenure Holder Specific Mitigations and Status			
ID	Proposed Mitigation	Status and Action	Adaptive Management	
		The Tenure Holder confirmed to BW Gold in Q1 2025 that WLRS (Q1 2025) had granted the Tenure Holder consent under the Wildlife Act s.59.1(1) for a temporary or partial discontinuance of the use of GTC 601039 for guiding in 2024.		
		Tenure Holder has not shared their 2025 planned use of the GTC as of March 2025		
11b	Notify Batnuni of proposed BW Gold field and aerial activities (the nature of timing and number of personnel and vehicles involved).	Twelve notices of proposed field work including aerial activities and scheduling were provided to the Tenure Holder accompanied with requests for information or an invitation to comment on activities. The focus of 2024 was	Implementation of this mitigation is ongoing.	
		environmental field activities outside the mine site and mine site and transmission line construction resulting in Transmission Line operation and mine site commissioning in late 2024.		
		Looking forward to the operations phase in 2025, field work may transition to scheduled, but less frequent visits to environmental monitoring and other inspection locations as part of the environmental reporting and post-construction		

Tenu	ure Holder Specific Mitigations and Status		
ID	Proposed Mitigation	Status and Action	Adaptive Management
		transmission line access road decommissioning. Aerial access to environmental monitoring locations will continue.	
11c	Share non-confidential information of a public nature, collected by BW Gold relating to moose and grizzly bear populations.	BW Gold will share with the Tenure Holder public information on moose and grizzly bear populations, published as part of the Annual Decision Statement report at the following link: <a href="https://www.blackwatergoldmine.com/resources/eac/BW-Gold-FUP-Report-2023-Update-for-Review.pdf?v=032104">https://www.blackwatergoldmine.com/resources/eac/BW-Gold-FUP-Report-2023-Update-for-Review.pdf?v=032104</a>	Implementation of this mitigation is ongoing.
11d	Receive from Batnuni, identification of noise sensitive receptor sites as input into the Noise and Vibration Effects Monitoring and Mitigation Plan	Closed	This mitigation has been closed and removed from the annual reporting process, consistent with the proposal contained in the 2023 Annual Report of March 2024. The mitigation is now reflected in Appendix B.
11e	BW Gold will seek to receive from the Tenure Holder a map which indicates the specific trails and roads utilized for hunting activity.	Tenure Holder reported they did not respond to this mitigation in 2023 and provided no further information in 2024 since they are "unable to operate in the GTC due to the project. (Batnuni April)	Implementation of this mitigation is ongoing.
		BW Gold notes this information is for the express purpose of aligning	

Tenu	ure Holder Specific Mitigations and Status		
ID	Proposed Mitigation	Status and Action	Adaptive Management
		potential field work to understand the general operating area of the Guide Outfitter and advise on mitigating potential interactions, not tracking or monitoring the activities of an individual guided trip. At present BW Gold has no knowledge of where the interface points could be within the GTC.	
13.	Discuss with Batnuni the timing of work activities and associated timing buffers, outside of the Certified Project Description boundary, to avoid or minimize disturbances around primary hunting months of September and October.	Multiple notifications of working activities and requests for information were distributed by BW Gold to the Tenure Holder. The Tenure Holder was invited to provide information to BW Gold about their use within the entire GTC.	Implementation of this mitigation is ongoing.
14.	BW Gold is committed, as part of Condition 39, to notification to Batnuni and other groups related to field work and construction related to the Transmission Line.	January 2024: Batnuni requested information regarding the TL clearing contractor and information was provided.  Throughout 2024 the BW Gold provided the Tenure Holder notifications related to field environmental work and TL construction, including conductor stringing in June 2024 and final energizing in Fall 2024.	Implementation of this mitigation has been concluded with the operational status of the Transmission Line. BW Gold proposes to close this mitigation and remove it from annual reporting process following submission of the March 31, 2025, annual report.

Tenu	Tenure Holder Specific Mitigations and Status			
ID	Proposed Mitigation	Status and Action	Adaptive Management	
16.	Include Guide Outfitter awareness information in regular safety and environmental inductions performed by the mine	Closed	This mitigation was closed and has been removed from the annual reporting process, consistent with the proposal contained in the 2023 Annual Report dated March 2024. The mitigation is now reflected in Appendix B	
21.	Offer to assist Batnuni with alternate trail head "set up" elsewhere in the Certificate Area due to equipment and supplies already in the vicinity once construction commences.	Closed	The mitigation was closed and has been removed from the annual reporting process, following submission of the 2023 Annual Report dated March 2024. The mitigation is now reflected in Appendix B.	
24.	BW Gold will report annually on the status of the implementation of the Tenure Holder-specific mitigations above. The Tenure Holder may provide, in writing, any impacts experienced by the Tenure Holder. Impacts will be reviewed as they occur or annually when provided by the Tenure Holder.  BW Gold will respond to valid impacts raised by the Tenure Holder with proposed actions, including adaptive measures, if applicable. The findings and actions will be reported in the Tenure Holder Monitoring Report.	The Tenure Holder provided information to BW Gold regarding the overlap between the Project Area and the GTC on February 21, 2024. (Batnuni April)  BW Gold evaluated the February 2024 information, and it failed to demonstrate how Batnuni's business operating in GTC 601039 has been impacted by the mine, or to further advance any discussions on appropriate mitigations.	Implementation of this mitigation is ongoing.	

## 4.0 Communication, Feedback and Engagement

GTC 60139 is held in the name of Lyle Barsby, who is a co-owner of Batnuni Lake Guides and Outfitters Ltd. (Batnuni) with James (Jim) Darrell Linnell. Batnuni Lake Guides and Outfitters is a BC Registered Corporation, operating in two adjoining GTCs, one of which is GTC 601039. Mr. Linnell was nominated by Mr. Barsby to represent Mr. Barsby's interests in the GTC and their shared interest in Batnuni in engaging with BW Gold. Mr. Barsby, represented by Mr. Linnell are referred to jointly as the Tenure Holder. All correspondence from BW Gold has been sent to both Mr. Linnell and Mr. Barsby.

### Communications in 2024 focused on:

- Efforts to meet with the Tenure Holder and receive GTC use and impact information. Sharing the 2023 THCMP Annual Report and engaging on comments (Batnuni April).
- Notifications and invitations to share information associated with fisheries and wildlife activities in the GTC outside of the CPD and scheduling and construction status of the transmission line and the mine.
- The Tenure Holder's expression of personal complaints containing accusations, subjective assertions, opinions, and speculations.
- Efforts to clarify the facts regarding regulatory processes and opportunities to engage and share information.

The details of the engagements are in Appendix C, Tenure Holder Communication and Monitoring Report, January 1, 2024, to December 31, 2024.

Legal counsel from BW Gold and Batnuni met on May 22, 2024, to exchange information and explore mitigations. At that meeting BW Gold counsel indicated that BW Gold would be open to considering mitigations proposed by Batnuni should Batnuni provide such mitigations. The Tenure Holder has neither responded to this offer nor provided further information to inform discussions.

Despite the Tenure Holder's statements (Batnuni June), as of December 31, 2024, the information provided to date has not demonstrated impact to the business operations within GTC 601039 nor advanced discussion on mutually agreeable alternative mitigations.

The THCMP provides a process whereby the Tenure Holder may provide proposed new mitigations to BW Gold in writing at any time and this has not occurred.

### Feedback received from the Tenure Holder in 2024 is summarized below:

- Tenure Holder justified non-responses to BW Gold in 2023 due to their asserted inability to conduct operations in the GTC. (Batnuni April) By "conduct operations," it means offering a nonmotorized wilderness experience within the SPNM Davidson zone of the GTC, which also overlaps the mine project area.
- The Tenure Holder implied that wilderness hunts in the SPNM Davidson zone of the GTC was
  their only operation in the GTC and a key element of their overall business model. The inability to
  confidently offer remote wilderness hunting experiences (since 2016) has negatively impacted
  Batnuni's operations. Batnuni has been unwilling to consider modifying its operations in a way
  that would allow it to continue to offer any services in any part or zone of the GTC. Batnuni
  insisted that impact information has been provided to BW Gold (Batnuni April).
- General concerns cited:

- Criticism of how EA Condition 39 (Transmission Line Routing) was allegedly implemented (Batnuni May).,
- Views on the 2021 process of how Condition 38 THCMP mitigations were developed (Batnuni May),
   and
- Meeting to discuss mutually acceptable mitigations. Note, this request was made on June 11, 2024, after a meeting occurred on May 22, 2024.
- Baseless criticism of the QP's qualifications

## 5.0 Evaluation and Adaptive Management

## 5.1 Effectiveness of the Mitigations

Effectiveness of the mitigations have been analyzed against two measures:

- Engaging in two-way dialogue, the Tenure Holder can gain an increased confidence in business
  operations and potential development opportunities. This would be demonstrated by responding to
  BW Gold outreach efforts, sharing information about their activities in the region and enable detailed
  conversation with BW Gold about site specific activities and timing; and
- The Tenure Holder engaging in other business activities within the 90% of GTC 601039, outside of the CPD (project area).

The Mitigations were developed following engagements with the Tenure Holder during the THCMP planning process. Effectiveness relies on clear, rational, timely and respectful two -way dialogue. The Certificate Holder has utilized project information sharing as a means in good faith to learn more about the Tenure Holder's desired and planned use in the entire GTC. Furthermore, the mitigations were planned to address the full range of potential uses across the entire GTC, ensuring comprehensive consideration of the Tenure Holder's operational capacity, not solely based on operations only within the SPNM Davidson zone.

Mitigations proposed to be removed following this issuance of this Annual Report are related to:

- (7) Tenure Holder's invitation to participate in the Access Management Working Group
- (9) BW Gold's participation in the Stuart Nechako Road Safety Committee
- (14) Transmission Line field work and construction activity notifications

## 5.2 Engaging in Two-Way Dialogue

Key principles from the Practical Guide to Effective Coordination of Resource Tenures (The Guide) (BC Gov 2008) and some of the "Applications" are excerpted below as a benchmark for analysis.

1. Due Diligence: Understand the big picture.

The Project footprint physically overlaps a small percentage of the GTC boundary. This overlap in combination with concern of approved uncontrollable noise sources (e.g., blasting) impacting the remote wilderness aesthetic is the rationale provided by the Tenure Holder for non-use since 2016. Crown land within the broader GTC 601039 contains hundreds of leases, licenses and tenures from

forestry silviculture obligations to active cut blocks and mineral tenures. These authorized industrial activities occur within a landscape which is designated primarily as a semi-primitive non-motorized access zone for the public and commercial operators such as the Tenure Holder. The Tenure Holder reported impacts to the remote wilderness aesthetic early in their operations with the interaction of horseback access on forestry roads. Resource and environmental management obligations for tenure holders which operate in the shared GTC area, are part of an industrial presence in both the SPNM and motorized landscape, which is outside the influence of BW Gold.

## 2. Communicate early, often and honestly: Share your plans and business needs with other tenure holders as soon as you can.

BW Gold has sought in writing from the Tenure Holder to understand the specific, factual impacts to the Tenure Holder in 2024.

BW Gold provided a range of detailed information, project updates and opportunities for Tenure Holder engagement in 2024. BW Gold communicated frequently on the schedule and environmental field work, construction and other potential disturbances. The Tenure Holder's limited responses were vague and contained unclear process criticisms and no proposed mitigations. Construction on the Transmission Line is complete, and the Tenure Holder will continue to receive environmental field notices together with other Tenure Holders as required.

## 3. Seek to Understand other perspectives: Listen carefully. Ask questions. Verify understandings.

Legal counsel from BW Gold and Batnuni met on May 22, 2024, to exchange information and explore mitigations. At that meeting BW Gold counsel indicated that BW Gold would be open to considering mitigations proposed by Batnuni should they provide them. The Tenure Holder has neither responded to this offer nor provided further information to inform discussions.

Correspondence suggests the Tenure Holder remains solely focused on the impact to their limited operations in the SPNM Davidson zone of their GTC in the region of the mine project area. The tone of communication indicates overall frustration arising from the circumstance of Government authorizing shared use in the region, knowing it could impact the remote wilderness aesthetic.

#### 4. Recognize the balance of responsibility:

BW Gold requested site specific and temporal information from the Tenure Holder to inform management plan mitigations and monitoring in the future. BW Gold is reliant on the Tenure Holder to provide information on a reciprocal basis.

The Tenure Holder has responded that they are not "able to operate" (Batnuni April). The Tenure Holder reports not utilizing any part of the GTC. The non-use arises from the alleged impact to the remote wilderness aesthetic in the SPNM Davison zone and potential industrial interactions elsewhere in the GTC. The Tenure Holder asserts that if (non-motorized) services were offered in the SPNM, industrial interactions could cause reputational harm and impact their broader business.

It is any tenure holder's responsibility to adaptively utilize their tenure even if other overlapping tenures are issued by government. In the instance of GTC 601039, the Tenure Holder can investigate operating under a modified business model anywhere within the GTC, regardless of their indicated previous business model of operating exclusively within the SPNM Davidson zone.

BW Gold will also continue to operate as though the Tenure Holder is developing a comprehensive plan of other potential operations across the entire GTC in consideration of other guiding services, as

they have the right to do. BW Gold's standing request for road and trail use information will serve as the primary information sharing tool directly, rather than through the AMWG.

The Guide explicitly reminds the reader that, "the Crown retains the right to tenure all surface and sub-surface resources within the authorized area...including minerals, and for the tenure holders to use those resources according to the terms of their tenure".

BW Gold will continue to seek operational planning information from the Tenure Holder, respond to their specific concerns related to operations and mitigations, identify how their concerns were considered and will be addressed in the context of the current management plans.

#### 5. Understand the Limitations of Tenures:

The Tenure Holder's business model in the GTC was structured to use a non-motorized experience, operating only in the SPNM Davidson zone of the VAMP (a limited area of the GTC), part of which is within the Mine project area. The GTC does not restrict geographical use of the GTC area, and the tenure must be used annually unless Tenure Holder is granted discontinuance as per the Wildlife Act 59.1. Issuance of a GTC does not require justification of a business model, and discontinuance is granted at the discretion of the regional manager. The EA Certificate would have been granted with the acceptance that wilderness hunting experiences in proximity of the mine would be influenced by the mine construction and operation.

The Tenure Holder is knowledgeable in diversified business since they operate a motorized guiding experience in an adjoining GTC and have always used that GTC as the basecamp for primary motor access into 601039.

As noted in past annual reports and the THCMP, the Tenure Holder misunderstood that industrial vehicles were not restricted in the VAMP SPNM zone. The Tenure Holder's preferred operations have had documented intermittent impacts since 2008. The Tenure does not guarantee a business model, nor does it guarantee that operations in the tenure will not be impacted by a member of the public or other tenure holder.

### 8. Realistically Assess and Adapt:

BW Gold evaluated the mitigations and the Tenure Holder's response to engagement attempts in 2024. The Tenure Holder continues to focus on alleged impacts related to not operating in GTC 601039.

BW Gold has previously requested specific, detailed information in 2021, 2022, 2023 and 2024 to demonstrate the alleged impact to their business operations in GTC 601039. The Tenure Holder has stated they have provided information, however, requested records and documentation have not been provided and conversations have been anecdotal. The Tenure Holder provided information in February 2024, and after evaluation by BW Gold it failed to demonstrate how Batnuni's business in GTC 601039 has been impacted by the mine or further advance any discussions on appropriate mitigations.

As of December 31, 2024, no further information has been received which demonstrates an impact to the Tenure Holders operations in or advances any appropriate mitigations. No meaningful contributions were made by the Tenure Holder to the AMWG in 2022 and 2023. As such, BW Gold's request for road and trail use information will serve as the primary information sharing tool directly, rather than through the AMWG. The AMWG will refocus on contributing participants.

The potential impacts on the Tenure Holder have been identified and duly considered during the Environmental Assessment review and management planning process conducted between 2016 and

2021. Since the Certificate Holder and the Crown have limited insight into the business operations of the GTC holder and rely exclusively on information from the Tenure Holder. There has been insufficient information gained to adapt the mitigations.

### 5.3 Other Business Activities

Another measurement of impact mitigation is whether the Tenure Holder has engaged in business activities anywhere in GTC 601039. BW Gold verified with WLRS (Q1 2025) that the Tenure Holder obtained consent from WLRS under the Wildlife Act s.59.1(1) for a temporary or partial discontinuance of the use of GTC 601039 for guiding. The Tenure Holder has reported not utilizing any area of the GTC since 2016

Despite the above the Tenure Holder remains solely focused on their past limited use of the GTC, specifically non-motorized (horseback hunts) in the SPNM Davidson zone. Consequently, the Tenure Holder reports they cannot operate in the GTC (Batnuni April).

The THCMP and VAMP outline that the SPNM limits only public and recreational vehicle access and does not limit industrial vehicle use of any SPNM zone. The THCMP documents past Tenure Holder industrial interactions while conducting their operations in the SPNM as early as 2008. The Mine Project area overlaps approximately 10% of the GTC and includes part of the SPNM Davidson zone.

Effective December 21, 2015, GTC 601039 was renewed by WLRS to December 20, 2040. The Statutory Decision Maker (SDM) has granted the Tenure Holder a s.59.1 Wildlife Act discontinuance annually since 2016. Prior to that in 2015 and 2014 only one animal per year was reported harvested. The SDM stated he is unaware of the Tenure Holder's business model (WLRS April), yet annual discontinuance has been granted for nine years. The Wildlife Act (Section 59(1)(2a)) states the (WLRS) regional manager may review the operation of the holder of the guide territory certificate, and after allowing the holder an opportunity to be heard, may suspend, cancel or refuse to renew the GTC. It is unclear if a decision will be made by the Tenure Holder or the SDM regarding retention of the GTC or future use, given the GTC has not been utilized since its renewal and there are no reported future plans to do so by the current Tenure Holder.

## 5.4 Challenges

- There are no activities reported to BW Gold by the Tenure Holder in GTC 601039 against which this
  plan may be measured for effectiveness. BW Gold's outreach has not been met with the anticipated
  development of a two-way communication process.
- BW Gold's efforts to engage and understand business impact, through the receipt of specific and substantiated data and documentation have not been achieved. Information received to date, despite the Tenure Holder insisting that information has been provided, has not been satisfactory in demonstrating any business impact to the Tenure Holder's operations in GTC 601039.
- In the past it was explained that the Tenure Holder's non-motorized operations in GTC 601039 were led from their basecamp in the adjoining GTC 500948 (Linnell). The Tenure Holder has been unable to provide data differentiating between services offered versus services delivered and the geographic location of the offering. Unsubstantiated harvest statistics for GTC 601039 for 2009-2015 (referenced in the THCMP) remains the only demonstration of past use of the GTC.
- The Tenure Holder has no physical or tenured infrastructure in GTC 601039 and has communicated
  that they have no desire to utilize any of the SPNM zones within the GTC due to expected sensory
  disruptions on the landscape outside of the CPD boundary and the lack of quality motorized guiding
  locations elsewhere in the GTC.
- From an integrated resource management perspective, cumulative impacts to the GTC have been the result of several government tenured and authorized activities including forest sector and mineral exploration outside of BW Gold's project scope. Other outside influences may include hunt success rates, wildlife populations, trail network availability etc. In the absence of reciprocal information sharing with the Tenure Holder, it is unclear how these other factors may be influencing the Tenure Holder's decision not to operate in the GTC.
- Finally, the content and tone of the Tenure Holder's responses to BW Gold's efforts to implement the
  mitigations do not seem to reflect a contextual understanding of the complexities of EA Conditions or
  a comprehension of technical documents.

The following Table 3 identifies approaches to adaptively manage the THCMP, drawn from Section.

13.0 Evaluation and Adaptive Management in the THCMP:

**Table 3: Adaptive Management Evaluation** 

Adaptive Management Review	Evaluation
proposed by the Tenure Holder will be analyzed	BW Gold did not receive any mitigation amendments or new mitigations from the Tenure Holder in 2024.
to understand the intended objective and implications.	BW Gold received general comments from WLRS on mitigation improvements (WLRS, April), which were outside the THCMP scope or not applicable in the circumstances.
BW Gold will provide a response to the Tenure Holder on the decision and the reasons for decision within 30 days of receiving the comments or following the conclusion of exploratory dialogue as referenced	This section does not apply as no new mitigations were proposed in 2024.
New and amended mitigations will be	No new mitigations were proposed.
incorporated into the Mitigations Measures Table and mitigations which have been completed will be marked as such.	Appendix A to this report outlines the Group 2 mitigations which were removed from the THCMP reporting process in accordance with the THCMP 2023 Annual Report.
	Appendix B to this report outlines Group 1 mitigations which are complete and were removed from the THCMP reporting process in accordance with the 2023 Annual Report (March 2024).
The THCMP will be updated to reflect changes in the Tenure Holder's business activities as it relates to active exercise of their GTC 601039, regulations or best management practices" (p. 29, 30).	There were no reported changes to the Tenure Holder's business activities.

### 6.0 Conclusions

BW Gold has provided extensive opportunities for engagement with the Tenure Holder by; regularly conveying detailed project schedules related to construction and field work, inviting the Tenure Holder to share information specific to their use of the GTC, and responding to comments and providing clarifications on project and the THCMP process.

BW Gold provides details of its field and construction activities to the Tenure Holder but is reliant on the Tenure Holder to provide information on a reciprocal basis. The Tenure Holder ceased offering non-motorized guiding opportunities in GTC 601039 in 2016, the year in which the EA Application was filed by New Gold, after a limited operation fraught with challenges (THCMP). Attempts to receive information from the Tenure Holder to substantiate impact to their business operation in GTC 601039 occurred again in 2024. The information received from the Tenure Holder was insufficient evidence to demonstrate both their business operations within GTC 601039, or that those operations had been impacted by the Project. The information did not advance discussion on mutually agreeable alternative mitigations.

The Tenure Holder has the capacity to plan long-term use, assess resource and field conditions available on the ground and offer multiple types of guided hunting opportunities. The Tenure Holder's business model has always operated from their basecamp in an adjoining GTC, where The Tenure Holder continues to operate motorized hunts. GTC 601039 is approximately 65% in the SPNM and 35% in the SPM (motorized), enabling other SPNM zones and SPM opportunities. The Tenure Holder has not acknowledged evaluating any other guiding opportunities in the GTC. Their focus is stated broadly as the "inability to operate". This is understood to refer to the combination of reduced access in proximity of the Project and the Davidson SPNM Zone and loss of other SPNM zones due to the potential for industrial vehicle interactions and mine-related noise.

BW Gold continues to utilize the principles associated with the Practical Guide as an overarching reference. The Tenure Holder has had limited engagement in response to BW Golds' efforts to implement the mitigations associated with THCMP. Therefore, without written reciprocal information sharing from the Tenure Holder BW Gold will operate on the understanding that the GTC is actively being utilized unless informed otherwise.

The mitigations implemented aimed to address active use scenarios and foster collaborative problem-solving efforts. However, in the absence of engagement from the Tenure Holder, these mitigations cannot be effectively evaluated. The Project encompasses approximately 10% of the GTC, and it is not clear if the Tenure Holder's business decisions are further linked to other Crown forestry and activity which has been active in the SPNM zones.

In 2024, communications from the Tenure Holder have exhibited a confrontational tone, including ambiguous claims, and presented statements that are confusing, misleading, and unsupported by evidence. These communications have not facilitated constructive dialogue and have become disruptive, frequently criticizing processes, staff, and contractors.

BW Gold remains committed to exploring opportunities for dialogue concerning specific site use in the GTC in proximity of the Project and temporal considerations with the Tenure Holder. Should the Tenure Holder wish to meet, BW Gold will continue to seek the information required to support discussions in advance to enable a productive conversation. Otherwise, BW Gold aims to foster collaborative efforts and will continuing regular outreach with the Tenure Holder through 2025.

### References

Batnuni Lake Guide and Outfitters Letter to Artemis Gold; Response to 2023 THCMP, April 27, 2024 (Batnuni April) BW Gold to Batnuni Lake Guides and Outfitters, June 21, 2024 (BW Gold June)

J. Linnell Email (Batnuni) to V. Erikson (BW Gold) May 3, 2024 (Batnuni May)

T. Larden, Section Head Fish and Wildlife, Ministry of Water, Land and Resource Stewardship, Email to BW Gold, Tenure Holder, April 4, 2024 (WLRS April)

Tenure Holder Communication and Management Plan Annual Report 2023, March 2024 (THCMP AR 2023)

Tenure Holder Communication and Management Plan (C.1) BW Gold, November 2022. (THCMP)

A Practical Guide to Effective Coordination of Resource Tenures, BC Government, 3<sup>rd</sup> Edition, 2008. (BC Gov 2008)

Integrated Land and Resource Registry, ILRR 1206415, search, February 27, 2024, GTC 500948 (ILRR 2024).

## Appendix A – Group 2 Mitigations Removed from THCMP

The following "Group 2" mitigations are excerpted from Rev C.1 Appendix D, Mitigation Measures, of the THCMP. They are noted as secondary mitigation measures for the Tenure Holder, but are primary measures reflected in other environmental management plans. Management Plans are available at www.blackwatergoldmine.com. As of 2024 BW Gold ceased tracking and reporting against these measures as part of Condition 38 in accordance with the annual report.

The measures are contained within the respective EAC Condition reporting tools, which have their own requirements for reporting and verification or in the case of ID 18, the wildlife data was determined to be confidential and may not be shared publicly. For information of the reader, the Transmission Line Construction Environmental Management Plan (TL CEMP) was incorporated in 2023 as Appendix J within the overall Construction Environmental Management Plan (CEMP). Consequently, some references have been updated.

ID	Mitigation	Reference Reporting Tool	Comments
3.	Locate the transmission line in existing disturbed areas, as will be described in the Final Transmission Line Routing Plan.	EAC Condition 39 Final Transmission Line Routing Plan EAC Condition 23 Wildlife Mitigation and Monitoring Plan • Section 3.4 Transmission Line Management	<ul> <li>The Phase 2 Final Transmission Line Routing Plan was approved on March 2, 2023, and it describes the routing through disturbed areas.</li> <li>Section 3.4 of the WMMP (July 2022) notes that</li> <li>TL alignment is located in disturbed areas while avoiding wetlands and other areas of high bird activity.</li> <li>TL construction management is detailed in the F.1 CEMP, Appendix J, Transmission Line Construction Environmental Management Plan (TL CEMP). TL CEMP, Table 9.4-1 Visual Resource Construction Measures describes mitigations to locate the TL along existing disturbed areas and associated visual impact mitigation.</li> </ul>
4.	Use existing roads and follow existing linear disturbances to support transmission line construction, as will be described in the CEMP (Construction Environmental	TL Construction Environmental Management Plan (TL CEMP)  EAC Condition 39 Final Transmission Line Routing Plan	The mitigation is captured in multiple locations as noted:  1. The CEMP, Table 9.11-1 Wildlife Mitigation and Management Measures which states that BW Gold will use existing roads and cleared/disturbed areas, rather than disturbing new areas, in order to minimize overall

	Management Plan)		clearing and crown land disturbance during construction. This is in accordance with the WMMP Section 3.3.2.
			F.1 CEMP, Appendix J TL CEMP, Section 9.10 Wildlife Protection, Table 9.10-1 Wildlife Mitigation Measures which calls for use of roads and cleared/disturbed areas rather than disturbing new areas; and
			Appendix J, TL CEMP, Table 9.4-1 Visual Resource Construction Measures provides that where design, engineering, environmental and heritage constraints allowed, the location of the TL poles was selected to cluster any potential disturbance next to existing infrastructure such as roads, while maintaining safe electrical and vehicle distances.
			EAC Condition 39, FTLRP Phase 2, Table 6-1 Visual Resource Mitigation Measures and Table 6-2 Non-Traditional Land and Resource Use Mitigation Measures (which includes Guide Outfitters), references the Appendix J, TL CEMP Section 9.10, Wildlife Protection, mitigation above.
5.	Maintain vegetated buffers adjacent to mine facilities and roads. Exceptions will include areas that will be managed for wildlife and human safety as will be described in the CEMP.	EAC Condition 13 Construction Environmental Management Plan Visual Impacts Management Plan	Visual resource management is addressed in Section 9.4 of the CEMP and in Appendix J, TL CEMP, Table 9.4.1. The Mines' visual impacts have largely been mitigated by engineering design and infrastructure siting. Site specific measures include designs to screen views of structures and/or soften the effect of structures breaching natural ridgelines when viewed from identified vantage points.
			Vantage points were identified through the engagement process involving Indigenous Nations and input from stakeholders. The Tenure Holder has not provided BW Gold with specific tenure use information or visual vantage points of interest to them.
6.	BW Gold will establish an	EAC Condition 13 Construction Environmental	FTLRP (Phase 2), Table 6-2 Non-Traditional Land and

	Access Management Working Group (AMWG) and invite participation from Aboriginal Groups, appropriate regulators, and local communities. Input will be used to inform the Traffic and Access Management Plan (TAMP). Batnuni is invited to participate in the AMWG. The TAMP will include a component to monitor the effectiveness of mitigation measures and adaptive management.	Management Plan Section 15.1 Traffic and Access Monitoring	Resource Use Mitigation Measures provides the following amended mitigation:  Established an Access Management Working Group with Aboriginal participation and consult with Aboriginal groups and appropriate regulatory agencies on the appropriate mechanisms to control access (including the use of and locations of gates on the mine access road), to monitor the effectiveness of those measures, and implement adaptive management should those measures prove less effective than anticipated.
8.	Use buses or alternatives to personal transportation to transport workers to the mine site during Construction and Operations to reduce potential for traffic accidents, as will be described in the 'Community	EAC Condition 37 Community Liaison Committee and Community Effects Monitoring and Management Plan. (CEMMP)	CEMMP, section 8.4, Employee Accommodation, Transportation and Traffic Management, provides that employees will be bused or shuttled to the mine site from different pick-up points on the Kluskus and Kluskus-Ootsa Forest Service Roads.  Buses transporting employees and leaving from Vanderhoof I have a defined route, which is shared with
	Effects Monitoring and Management Plan'.		the CLC and posted to the Mine website.  Section 11.2, the Community Feedback Mechanism describes how BW Gold will seek and respond to concerns about the Mine, including traffic and bus route.
10.	Restrict Mine vehicles to designated roads and trails. Private vehicle access to the mine site will be limited to authorized personnel. Use of mine vehicles for recreational purposes will be prohibited at all times.	EAC Condition 37 Community Liaison Committee and Community Effects Monitoring and Management Plan. EAC Condition 13 Construction Environmental Management Plan	The CEMP has adopted the following mitigations in Section 9.1-1 General Mitigation and Management Measures, Traffic and Site Access:  Restrict site access to authorized personnel in accordance with the MSTCP (Section 7.4 Access Control and Security)  Require use of busses to transport nonmanagement workings to the mine site along the

			<ul> <li>Kluskus and Kluskus-Ootsa FSRs. (Also included in CEMMP, Section 8.4)</li> <li>Mine vehicles will be restricted to designated roads and trails. Signate will be used on all roads to indicate access and road restriction will be part of training. Private vehicle access will be limited to authorized personnel only. If personal vehicles ae used for sites access, they will be prohibited from use on mine site roads.</li> </ul>
12.	Provide the construction schedule to tenure holders and recreational groups (including at least the Northwest Brigade Paddling Club, nearby lodges and the local offices of BC FLNRO) overlapping the Mine, 30 days prior to the start of construction and resolve any issues related to access as per appropriate industry and provincial standards, guidelines and best practices.	EAC Condition 37 Community Liaison Committee and Community Effects Monitoring and Management Plan	This mitigation is included in the CEMP, Appendix J, TL CEMP, Section 9.12 and reflected in Table 6-2 (Non-Traditional Land and Resource Use mitigation measures) of the EAC Condition 39 FTLRP (Phase 2).
15.	Minimize sensory disturbance due to noise and light in areas adjacent to the mine site and airstrip, including the use of noise abatement technology, equipment placement, regular equipment maintenance, and enforcement of speed limits.	Noise and Vibration Effects Monitoring and Mitigation Plan  EAC Condition 13 Construction Environmental Management Plan  Table 9.5.1 Noise and Vibration Mitigation Measures  Table 15.9.1 Mitigation Measure Effectiveness Monitoring for Wildlife	Noise management mitigations are provided in NVEMMP, Section 10.1 Implementation, Mitigation Measures.
17.	Use noise abatement and schedule construction and decommissioning activities at noise-sensitive locations and	Noise and Vibration Effects Monitoring and Mitigation Plan	This mitigation has been modified in the final approved NVEMMP.  NVEMMP Section 11.1.2 provides that major noise generating activities will be communicated through

	times, where and when hunters, guide-outfitters and trappers are active to limit disruption to sensitive receptors (Hunting, Guide Outfitting and Trapping). Noise sensitive locations and specific mitigation measures will be identified in the Noise and Vibration Effects Monitoring and Mitigation Plan.		processes identified in the Community Effects Monitoring and Management Plan (CEMMP) and provided to the Community Liaison Committee through processes outlined in Table 11.1-1 of the CEMMP.  Noise compliance monitoring is described in section 10.2.2 of the NVEMMP.  Noise Sensitive locations and monitoring locations are identified in the NVEMMP, Figure 10-1.  The CEMMP provides for the process of receiving the construction schedules and maps where disturbing land or reducing enjoyment of land use may be experienced.
18.	Conduct additional fall surveys of moose activity in and moose sheds in the Mt. Davidson area. BW Gold will share nonconfidential, public fall moose survey information to understand potential Mine influences.	EAC Condition 23 Wildlife Mitigation and Monitoring Plan Section 4.4.3.3 Moose Distribution Monitoring	BW Gold was informed through the Wildlife QP and the Ministry of Water, Land and Resource Stewardship that information collected in 2022 was considered sensitive and not appropriate to share publicly, and therefore, not with a commercial wildlife business. Moose distribution monitoring data remains available to the Provincial government only.
22.	Relevant provisions of the Wildlife Mitigation and Monitoring Plan will be considered for incorporation into road use agreements and communicated with Batnuni and other commercial users of BW Gold controlled access roads to which BW Gold enters into road use agreements.	EAC Condition 23 Wildlife Mitigation and Monitoring Plan Section 3.6.1 Transportation and Access Section 3.6.2 Wildlife Activity on Roadways	BW Gold has concluded Road Use Agreements with multiple road operators in the Mine area. A limited number of those roads may be controlled access. Where BW Gold is utilizing a road under agreement to a third party, the mitigations under the Wildlife Mitigation and Monitoring Plan will apply to those roads when used by all BW Gold employees and contractors. WMMP Section 3.6.1 Transportation and Access and 3.6.2, Wildlife Activity on Roadways outline the measures that BW Gold will utilize with respect to wildlife interaction with BW Gold access roads.  Signatories to the Road Use Agreements are invited to participate in the Access Management Working Group and are part of the Stuart Nechako Road Safety

Committee (formerly Kluskus Industrial Users Group).

			Both venues provide opportunity to discuss questions or concerns regarding wildlife mitigation and monitoring implementation.
			EAC Condition 23 provisions apply to the use and maintenance of the roads controlled by BW Gold, in addition to conditions applied under provincial permit or entered into directly with the primary operator.
23.	BW Gold has committed to a number of mitigations related to Transmission Line construction, attached in Appendix 4. A comprehensive list of construction impact mitigations has been provided as part of Condition 43 and provided to Batnuni in the February 21, 2021, letter and on September 3, 2021.	Applicable EAC Conditions identified in Condition 43	The CEMP, Appendix J, TL CEMP contains all related Management Plans and summaries of all mitigation measures by planning component. The mitigations identified in Condition 43, have been incorporated across the range of associated Mitigation plans.

## **Appendix B - Group 1 Closed Mitigations**

The following Group 1, Tenure Holder-specific mitigations were closed and removed from the Annual Reporting Process. The closed mitigations are tracked for reference.

ID	Mitigation	Status
1	BW Gold will advise the Tenure Holder of the process required to receive notification of filed regulatory documents on the BW Gold Mine.	The Mitigation was closed and removed from the annual reporting process, consistent with the proposal contained in the 2023 Annual Report dated March 31, 2024.
11d	Receive from Batnuni, identification of noise sensitive receptor sites as input into the Noise and Vibration Effects Monitoring and Mitigation Plan.	The implementation of this mitigation was ongoing to June 30, 2024, after which it was proposed to be closed and removed from the annual reporting process.
		The mitigation has now been removed from the annual reporting process.
16.	Include Guide Outfitter awareness information in regular safety and environmental inductions performed by the mine.	Guide outfitter awareness training is included in the onsite orientation package for all new staff and contractors as of January 2024 and is ongoing.  The mitigation was closed and removed from the Annual Reporting process, consistent with
		the proposal contained in the 2023 Annual Report dated March 31, 2024
21.	Offer to assist Batnuni with alternate trail head "set up" elsewhere in the Certificate Area due to equipment and supplies already in the vicinity once construction	The Tenure Holder has not provided an alternative trail head set up in writing by

commences.	September 1, 2023, because they believe the SPNM areas would continue to be impacted by motorized traffic, or the wilderness aesthetic affected by industrial operations.
	Elsewhere in the GTC the road system is motorized, and a trailhead is not necessary.
	The mitigation was closed and removed from the annual reporting process, in accordance with the proposal following submission of the 2023 Annual Report dated. March 31, 2024

# Appendix C – Tenure Holder Communication and Monitoring Report January 1, 2024, To December 31, 2024

The following report is a continuation of the THCMP Appendix C BW Gold Engagement Report and 2023 Annual Report released in March, 2024. Engagement reporting has been transitioned to the THCMP Annual Report to provide a contemporary detailed supplementary reference for the reviewer.

Interaction Number	Date	Type of Interaction	Attendees/Correspondants	Subject Area	Summary of Issues and Concerns (Project-specific Interactions)	Additional Information Required	Proposed Mitigations Batnuni	How issues and concerns have been addressed (BW Gold)	Proposed Mitigations - BW Gold (See Mitigation Table)
275	12/9/2024	Letter	BW Gold + 18 Recipients	Offsite Sampling - Transmission Line Monitoring	Notification to the Tenure Holder that BW Gold will conduct stream monitoring on December 10. The monitoring will take place at specified locations and will use roads such as Holy Cross FSR and Fraser Lake Airport Road. The activity will not disturb the land or water, and no heavy equipment will be used.	For any questions, stakeholders can contact the Community Office	No comments were received.		
274	11/19/2024	Letter	BW Gold (C.Sharwood) to 49 Tenure Holders	Mine Site Blast Notification 2024	Notification sent informing the stakeholders of upcoming activities at the Blackwater Mine. First gold pour is targeted for late Q4 2024, with operations possibly beginning 30 days from now. Blasting activity is currently ongoing and will continue during operations, occurring daily between 6am and 7pm. Safety measures are in place to restrict access to designated areas to trained and authorized personnel only. Mitigation plans are available to minimize noise, vibration, and visual effects.	For any questions or concerns, community members can contact the Community Relations (CR) Manager, call the community office at 250-567-3276, or use the community feedback mechanism on the Artemis Gold website.			
273	10/16/2024	Letter	BW Gold (C.Sharwood) to 61 Recipients	BW Gold Schedule of Planned Activities (Federal Conditions 6.6 and 6.7)	Provided a notification letter with an updated schedule of activities for the Blackwater Mine as per FDS 6.6 and 6.7 to tenure holder		No comments were received.		
272	9/19/2024	Email	QP to T.Larden (FOR), BW Gold (C.Sharwood), J.Linnell,	#38 THCMP Appendix D update	Summarizing the purpose of the Annual Report and THCMP Appendix D update; close the loop with Mr.Larden's previous conversation with V.Erikson; and affirm his proposal to retract his previous comments.				
271	9/13/2024	Letter	BW Gold (C.Sharwood) to 49 Tenure Holders	2024-09-13 Notification: Transport of Transformer Wide Load to Blackwater Mine	Provided notification to stakeholders and community leaders that a wide load travelling through their area and may temporarily impact traffic patterns. provided Critical Traffic Control Measures that are being implemented at critical locations and timelines.				
270	2024/09/03	Telephone Call	BW Gold (C.Sharwood) to T.Larden (For)	THCMP Appendix D Update and Annual Plan	Following up on V.Erikson's email and call with T.Larden. He had been telephoned by V.Erikson to inform him that the feedback he provided on the report was not applicable since the mitigations were not changing. It was explained the Management plan had been approved in 2022, and the Appedix D was updated following the Annual Report was reporting back on progress/proposals under the THCMP the previous year.				
269	7/12/2024	Email	BW Gold + 49 Tenure Holders	Care and Maintenance Plan (EAC 11);Communication all Tenure Holders	Provided an attached Notification Letter of an updated schedule of activities for the Blackwater Mine to all Tenure Holders.				
268	7/12/2024	Email	BW Gold (V.Erickson) to J. Linnell, L. Barsby	Care and Maintenance Plan (EAC 11), Tenure Holder Communication and Mitigation Report (Batnuni Only) (EAC 38)	Provided an attached Notification Letter of an updated schedule of activities for the Blackwater Mine to Batnuni. Tenure Holder responded by providing a summary of BWG mitigation measures (April 2020) and noting that BWG has yet to consult, or have yet to come to a mutually acceptable accommodation for project effects.				
267	6/28/2024	Email	J. Linnell to BW Gold (V.Erickson)	THCMP Annual Report	Requested to know where in the 2023 Annual Report their comments and Forests were included.			T.Larden had been telephoned by V.Erikson to inform him that the feedback he provided on the report were not applicable. The Management plan had been approved in 2022, and the Annual Report was reporting back on this.	

BW Gold (V.Erickson) to J.

Linnell, L. Barsby

BW Gold to Tenure Holder and

49 others in the Region

263

262

6/4/2024

6/3/2024

Letter

Letter

Blackwater Mine Field Activities - In accordance with

Condition 38

Notification of Blackwater Mine activities – Helicopter

use along the Transmission Line

Interaction Type of low issues and concerns have been addressed (BW posed Mitigation Date ttendees/Correspondants Subject Area Summary of Issues and Concerns (Project-specific Interactions) Additional Information Required **Proposed Mitigations Batnuni** Interaction - BW Gold (See Mitigation Table) Provided a response to the April 27, 2024 Batnuni comment on the Annual Reports summary of Batnuni's lack of engagement in 2023. BW Gold reiterated that: 1. While Batnuni may not be hunting in the Davidson, activities may be conducted anywhere in the GTC and the mitigations remain valid, and 2. Stated the timelines around operation of BW Gold (V.Erickson) to J. BW Gold response to Batnuni letter on the 2023 Annual 266 6/21/2024 Letter the AMWG which provided opportunity for the Tenure Holder to Linnell, L. Barsby Report participate, and 3. Acknowledged receipt of Batnuni's hunting discontinuance under the Wildlife Act, and 4. BW Gold's continued interest in exchanging information to better understand potential project effects, particularly noise and vibration at Batnuni's asserted past use Seeking to know when "the following measures to mitigate potential effects of the Transmission Line on commercial and non-commercial land Provide an update on Transmission Line mitigations per 2021 EAC Condition 43 list. J.Linnell to BW Gold Implementation of Transmission Line 265 6/5/2024 Email use and interests will be implemented. (Attachment 1 Blackwater Gold (V.Erickson) Mitigations Project Summary of Mitigations updated as per EAC Condition 43 attached) An email with BW Gold's February 21, 2021 letter (Condition 39 consultation on three potential routing alternatives associated with the Transmission Line) referred to the list of Condition 39 mitigations and J. Linnell to BW Gold enquired about BW Gold's committment to, "implement the following Provide an update on implementation of mutually Batnuni response to Blackwater mine Field Activities 264 6/4/2024 Email measures to mitigate potential effects of the transmission line on (V.Erickson) notification acceptable mitigation measures generally. commercial and non-commercial interests and land use interests" will be implemented, specifically, identification of mutually acceptable accomodations for potential project effects.

BW Gold (Blackwater Project Owner) a subsidiary of Artemis Gold Inc. as of August, 2020 referred to as BW Gold.

Provided a notification letter outlining upcoming helicopter use along the

transmission line including maps showing locations for the month of June.

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transmission line including maps showing locations for the month of June.

Response received June 4, 2024

Interaction Number	Date	Type of Interaction	Attendees/Correspondants	Subject Area	Summary of Issues and Concerns (Project-specific Interactions)	Additional Information Required	Proposed Mitigations Batnun	How issues and concerns have been addressed (BW Gold)	Proposed Mitigations - BW Gold (See Mitigation Table)
261	5/22/2024	Meeting	BW Gold Counsel, Batnuni Counsel	Meeting with Batnuni Counsel	Discussed Batnuni's use of the GTC and potential mutually acceptable mitigations. No mutually acceptable mitigations were identified. BW Gold affirmed the documents provided in February 2024 failed to demonstrate how Batnuni's business has been impacted by the mine, or further advance any discussions on appropriate mitigations.				
260	5/3/2024	Email	J.Linnell to BW Gold (V.Erickson)	Batnuni-Blackwater Mine Transmission Line construction information and request for information	General criticism for a 2021 BW Gold (Condition 39) notification of mitigation measures to address impacts of the final Transmission Line route selection. (2021 Final Transmission Line Routing letter sent February 2021), . 2. BW Gold compliance with the Vanderhoof Access Management Plan. 3. Confirming FLNRORD (sic, FORESTS) has provided permission to not use the territory, citing a BW Gold press release from September 2022 stating 500 workers on the project, and hunting in the Davidson would be 'irresponsible'. 4. Criticism of the AMWG.			A BW Gold letter sent June 21 2024 addressed issues related to AMWG (from the April Linnell Letter) and explaining BW Gold's view that the Tenure Holder may be operating in other areas of the GTC away from the Mine and Transmission Line.	
259	5/3/2024	Letter	BW Gold (V.Erickson) to J. Linnell, L. Barsby	Batnuni-Blackwater Mine Transmission Line construction information and request for information	Advised Tenure holder that pole foundation and installation has begun.	BW Gold requested information on any other activities in the GTC such as trail or infrastructure upgrades, or any road use in the vicinity of the transmission line right of way area			
258	5/2/2024	Letter	BW Gold (V.Erickson) to J. Linnell, L. Barsby	Notification of Blackwater Mine field activities - Waterbird Surveys via Helicopter, in accordance with THCMP Mitigation 11(b)	Tenure holder advised BW Gold to see their response to the Artemis THCMP Annual Report.	Requested information on Tenure Holder uses in the area.			
257	5/1/2024	Letter	BW Gold to Tenure Holder and 49 others in the Region	Notification of Blackwater Mine field activities - Waterbird Surveys via Helicopter	Notification of waterbird surveys to broad list of land users in the area. A map was attached along with additional details.				
256	4/27/2024	Letter	J.Linnell to BW Gold (V.Erickson, C.Sharwood), E.Frisch, FOR (T.Larden),	THCMP Appendix D Update and Annual Plan	Response to the Annual report. Batnun provided information on its operations in the past. A meeting was scheduled to discuss impacts and potential mitigations with counsel from BW Gold. Batnuni did not respond to items 2, 7 11d, 11e because they were unable to operate in the territory. Wilderness hunts in the Davidson are a key piece of Batnuni's business and not offering it has negatively impacted its operations. Operations are unable to be modified to continue to allow these operations.		A meeting between counsel.	A meeting occurred between counsel in May. Information provided to date by Batnuni has not demonstrated an impact to the operation in GTC 601039 and has advanced discussion on mutually agreeable mitigations. The 2024 Annual Report released in 2025 incorporates Batnuni's comments. A letter was sent June 21, 2024 with a full response.	

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255	4/24/2024	Email	BW Gold to Tenure Holder and 49 others in the Region	Proposed Blackwater Gold Project – Spring/Summer Field Programs and Activities Notification	Broad notification to all land users that BW Gold's field programs and activities in and around the Blackwater mine site and transmission line route are underway. Field crews working will be working around the Blackwater Mine, along the Kluskus FSR, Mine Access Road and transmission line route.  Letters listed the environmental field programs and transmission line activities.	Statement offering the Tenure Holder to contact BW Gold for more information			
254	4/19/2024	Email	BW Gold (V.Erickson) to J. Linnell, L. Barsby	THCMP, Mitigation 11b Notification	BW Gold informed Batnuni Guides and Outfitters of an upcoming set of fisheries compliance surveys occurring in the mine region, including six survey sites within GTC 601039, between the dates of approximately April 22 and June 16.	Batnuni was invited to share any information with BW Gold about your activities in the area.			
253	4/16/2024	Telephone Call	V.Erickson to T.Larden (FOR)	#38 THCMP Appendix D update (2024)	BW Gold called to discuss T.Larden's comments and explained that Management Plan already went through a review process and has been approved. The Changes to the THCMP Appendix were to remove the Group 1 mitigations that are now complete and remove all Group 2 mitigations as they are managed in other plans. The Annual Reports give a picture of the communication process and would shed light on the exchanges between the Tenure Holder and BW Gold. (It was learned that he did not receive the Annual Report update, so was commenting on the Appendix D updates without context.). T.Larden noted that if there is no action for him, he can retract his email. BW Gold would followup to confirm.	BW Gold would followup to confirm if email should be retracted.		T.Larden (FOR) should be included in both the Annual Report and the THCMP Appendix updates to avoid confusion.	
252	4/4/2024	Email	T.Larden (FOR) to V.Erickson, QP, Batnuni (Linnel, Barsby)	#38 THCMP Appendix D update (2024)	FOR provided comments on the THCMP Appendix D mitigations (which had remained unchanged from 2022). Comments were focused on general GO operational issues and functional process management and not specific to the Tenure Holder.			Phone call 04/16/2024 to clarify purpose of the email and there is no action for FOR. Email September 19, 2024 from QP confirming comments could be retracted as per telephone call between himself and V.Erickson on 4/16/2025 as they did not align with the review process.	
251	3/28/2024	Email	BW Gold (V.Erickson) to J. Linnell, L. Barsby, Forests (T.Larden)	#38 THCMP Appendix D update (2024)	Provided Appendix D Mitigation Matrix (One document showing edits and one "clean" version with edits incorporated), in accordance with Section 13 (Evaluation and Adaptive Management) and Section 14.0 (Plan Revision) of the THCMP (Tenure Holder Communications and Mitigation Plan). Group 2 mitigations were removed from the THCMP as proposed in the plan.	As per section 14.0 Plan Revision, the Tenure Holder and Ministry of Forests will have 30 days to review the document and provide BW Gold written comments. BW Gold will have 30 days to respond to those comments. Comments by April 28, 2024.			

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250	3/28/2024	Email	BW Gold (V.Erickson) to J. Linnell, L. Barsby	#38 THCMP Annual Report - March 2024	Transmitted March 2023 THCMP Annual Report and summarized the major realignment of the Group 2 mitigations.	Advised Batnuni to respond by email within 30 days (Apr 28 2024) and also that a hard copy will mailed.			
250	3/25/2024	Email	J. Linnell to BW Gold (V.Erickson). T.Larden (FOR)	#38 THCMP Annual Report - March 2024	Tenure Holder enquired on Community Relations Manager's role and why she was contacting T.Larden about the s.59 Wildlife Act discontinuance. 3/26: Remove reference to discontinuance in the Annual Report.	Provide QP Qualifications		Report byengaging with FOR to confirm a statement made by the Tenure Holder in October 2023 that a discontinuance was received by the Tenure Holder FOR. 3/28/2004 CR Manager advised Tenure Holder the reference of the following: 1. discontinuance is noted in the Wildlife Act Sec 59.1(1) and will remain in the annual report. 2. BW Gold has requested info from Batnuni on planned activities in the GTC and no response until Nov 7 stating they are not hunting. 3. Counsel for both parties are in communication 4. the QP qualification for E Frisch	
249	3/25/2024	Email	BW Gold (V.Erickson) to T.Larden (FOR), J.Linnell, L.Barsby	Confirmation from Province on Tenure Holder granted a 2024 discontinuance of GTC 60139	A followup email to T.Larden (FOR) summarizing call on 3/21 to confirm that Batnuni received a Wildlife Act s.59.1(1) approval for a discontinuance for April 1, 2023 to March 31, 2024 from the Ministry. Acknowledging the Tenure Holder may conduct other activities in the guide territory such as maintaining trails or infrastructure or conducting resource inventories.	When does the Government (Statutory Decision Maker) review start? When would the SDM typically receive a request from a GTC holder for an exemption.			
248	3/5/2024	Letter	BW Gold (V.Erickson) to J.Linnell, L. Barsby	Batnuni-Upcoming Fisheries Field Surveys	In accordance with Mitigation 11(b) of the Tenure Holder Communication and Mitigations Plan (THCMP) commitment. BW Gold informed Batnuni Guides and Outfitters of an upcoming set of fisheries compliance surveys occurring in the mine region, including five survey sites within GTC 601039, between the dates of approximately March 6 and 10.		No comments were received.		
247	2/9/2024	Letter	BW Gold (V.Erickson) to J.Linnell, L. Barsby	Blackwater Gold Schedule of Planned Activities-Feb 9- Tenure Notifications	Provided an attached, notification letter with an updated schedule of activities for the Blackwater Mine to Tenure holders.		No comments were received.		
246	1/4/2024	Letter	BW Gold (V.Erickson) to J.Linnell, L. Barsby	BW Gold TL Clearing Notification-Batnuni			No comments were received.		