



December 2, 2025

**GreenLight Wisconsin LLC
Soo Line 40 Exploration Program
Bend Project, Westboro Township, Taylor County**

Notice of Intent to Drill / Plan of Operations

1.0 Introduction

GreenLight Wisconsin LLC. (GLW) is submitting to the Wisconsin Department of Natural Resources (WDNR) and the United State Forest Service (USFS) details for planned exploration work on a 40-acre parcel (Soo Line Mineral Parcel) covering a portion of the Bend Copper-Gold-Tellurium project located in Westboro Township, Taylor County, Wisconsin. Exploration work proposed to be completed during this program will consist of the drilling of up to 20 drillholes (total up to 23,000') from up to 15 drill sites. Work is planned to begin in January of 2026 and may continue on a periodic basis until the full scope of the work is completed.

The exploration work proposed by GLW is a continuation of previous exploration efforts focused on delineating the mineral resources of the Bend Volcanogenic Massive Sulfide (VMS) deposit. Initial exploration work conducted in the area was completed by the Jump River Joint Venture (JRJV) from the mid-1980's to the mid-1990's. Additional exploration work was conducted by Aquila Resources Inc. from 2011-2012. Most recently, GLW completed the drilling of 6 drillholes from 3 drill sites on the Soo Line Mineral Parcel between June and August of 2025. To date, a total of 13 drillholes have been drilled within the Soo Line Mineral parcel on which the GLW's proposed exploration work is planned to take place.

An initial winter program is intended be initiated beginning in January, 2025. Subsequent programs will likely be required to complete the entirety of the scope of proposed work and will be completed after 'spring break-up' (typically from mid-March through the end of April) and may continue through the summer and following fall/winter.

The following sections describe the planned exploration work proposed to be completed under this exploration program and serves as the submittal of a Notice of Intent to Drill (WDNR) and Plan of Operations (USFS) for review. Additional information requested of GLW by the WDNR/USFS pertaining to this work plan, as well as additional permits and/or permissions which are either pending at the time of this submittal or are found to be required upon the review of this submittal, as well as a final bond submitted to the WDNR to cover reclamation work for this program, will be provided as such information and/or approvals become available.

GLW is currently in the process of submitting amendments to permits and approvals to the WDNR that were previously in place for the 2025 drill program. This includes an amendment to GLW's General Construction Stormwater Permit, a renewed Endangered Resources Review and an amended/renewed General Dewatering Permit. These permits/reviews are expected to be processed within the coming weeks and the proposed work will not begin until all authorizations are in place. Additionally, GLW will be required to submit an application for a Wetland Permit through the WDNR for conducting work within 3 proposed drill sites and associated access located within the extents of regulated wetlands. These proposed sites are not of immediate concern for GLW's initial exploration plans. GLW requests that a conditional approval, for all upland sites, be considered as the plans and approval for conducting work within regulated wetlands are being finalized.

Through conversation with the USFS, GLW has included with this submittal (**Exhibit A – Mitigation Standards**) a list of mitigation standards that will be implemented for work within the National Forest to provide congruency with the USFS's Forest Plan guidelines. Applicable items within this document are discussed in the sections below, however, the attached document serves as a compilation of mitigation measures that will be adhered to during this program. Note that these mitigation measures have been established to assure congruency with the USFS's Forest Plan guidelines and are not meant to conflict with or supersede any State regulations or authorizations required by the WDNR.

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GLW requests that all listed contacts be copied on all notices and orders delivered to GLW. GLW requests that all paper correspondences be sent to Eric Quigley (address above).

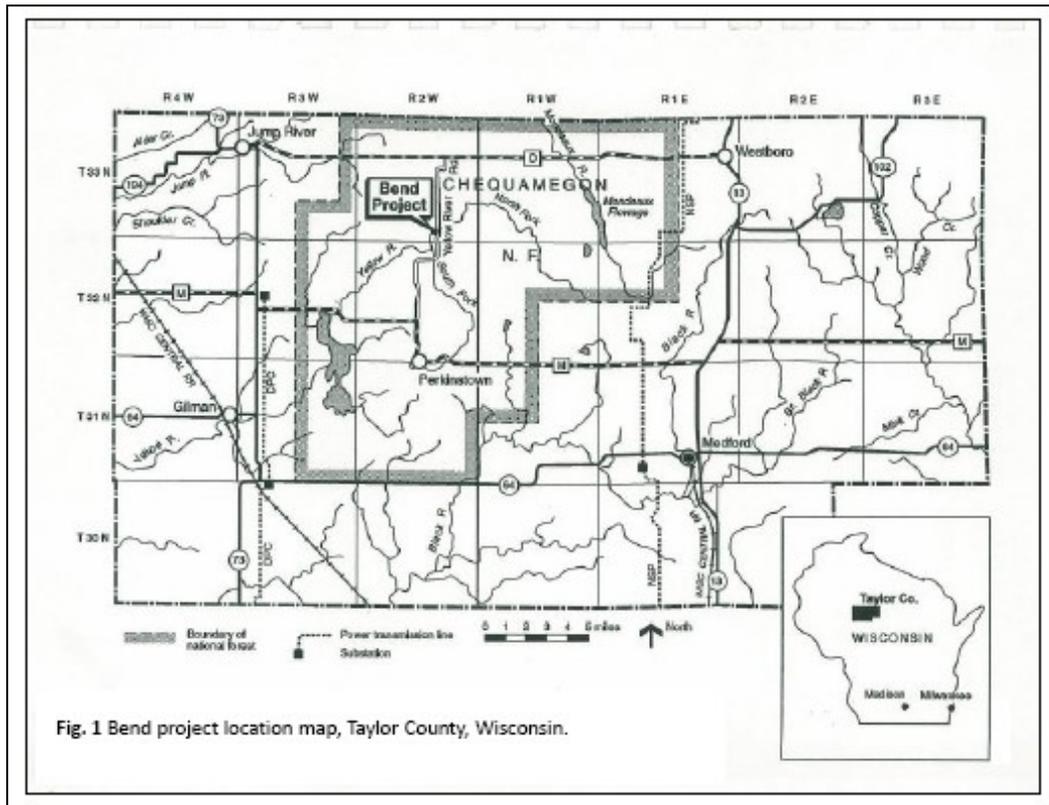
2.0 Location and Property Information

The proposed exploration work is planned to take place on a 40-acre parcel (herein identified as the “Soo Line Mineral Parcel”) described as:

NW ¼ of the SW ¼, Section 35, T33N, R2W, Westboro Township, Taylor County, Wisconsin.

Access to the property is located directly off of the Yellow River Road approximately 7 miles north of the town of Perkinstown (Fig. 1).

The forty-acre Soo Line Mineral estate is owned by the Soo Line Railroad d/b/a Canadian Pacific Railway (Soo Line). GLW currently holds a 20-year mineral lease (effective as of 2019) with Soo Line which grants GLW the right to access and explore the 40-acre parcel. The surface estate for this parcel is federally owned and is managed by the USFS.



3.0 Project Schedule

Proposed work is planned to commence upon receiving all required permissions and permits from the USFS and WDNR. An initial winter program is currently planned to begin in January, 2026 and will likely conclude prior to the onset of 'spring break-up' (typically from mid-March through the end of April and concurrent with the implementation of seasonal road restrictions). GLW will keep the USFS/WDNR informed on their plans for conducting site work and will provide a minimum 48-hour notice prior to commencing drilling activities.

In order to complete the entirety of the scope of the proposed exploration work, it is likely that a subsequent program(s) will be carried out in the summer through fall/winter of 2026. GLW will inform both the USFS/WDNR of its plans to resume exploration activities after the initial winter program is completed and will provide a minimum 48-hour notice prior to resuming drilling activities.

Throughout the duration of the proposed exploration work, site reclamation activities including sump abandonment and temporary/permanent site stabilization will be completed after associated drill sites and access routes are no longer being utilized. In cases where site reclamation activities cannot be completed due to the associated disturbances having been completed during winter months (i.e. revegetation, sump abandonment), such activities will be completed as weather conditions permit.

The presence of conditions at site which are not conducive to conducting the drilling program in an effective and environmentally sound manner may cause delays to the start of the program and/or may require that the program is temporarily suspended and later resumed. GLW will keep both the USFS and WDNR informed of any delays to the program and will provide proper notifications to the department of resuming drilling activities in the event that the program is suspended for any reason.

In the event that the program is suspended, GLW will inspect all active Best Management Practices (BMPs) and will install additional BMPs as necessary to ensure that sediment from any disturbed areas does not migrate toward downslope wetlands and waterways. Disturbed areas and soil stockpiles will be temporarily stabilized until the program resumes and/or until final reclamation can be completed. Equipment will be either demobilized from site and/or secured on site (if agreed upon by the USFS). A perimeter fence will be installed at any open sumps, with the liner folded over the top of the contained cuttings, and/or backfilled if it is possible to properly dispose of cuttings. Any partially completed holes will be temporarily abandoned with the casing capped (using a threaded or welded cap). Regular monitoring of the site will continue throughout any inactive periods of time as required under any and all permits and approvals.

4.0 Project Details

4.1 Project Scope

GLW has identified and located 18 drill sites and associated access routes that may be utilized during the proposed program (**Attachment 000 – Bend_SooLine_Plan Map**). A total of up to 20 drillholes may be constructed from up to 15 drill sites totaling up to 23,000 feet of drilling. The actual number of drill sites utilized and drillholes constructed will be dependent upon the geology encountered throughout the duration of the program. GLW will keep both the USFS and WDNR notified of the intended drilling locations prior to initiating drilling and throughout the duration of the program. In an effort to minimize disturbances, multiple holes may be drilled from the same drill site and the total number of drill sites utilized will likely be less than planned.

During the fall of 2025, GLW surveyed in and flagged all proposed access routes as well as the approximate collar locations at each proposed drill site. The approximate collar locations at each drill site are tabulated below in **Table 1**. Access routes and drill site locations have been located to avoid wetlands and the removal of large trees to the greatest extents practical. However, access to the project site directly off of the Yellow River Road/FR-112 will require crossing a small wetland ditch located in the active roadway. Three drill sites (SL-16, SL-17, and SL-18) and portions of the access to these sites are located within delineated wetlands. Refer to the plan maps (**Attachment 000 – Bend_SooLine_Plan Map**) for locations of the proposed access. GLW has planned a total of 4,330’ of access which includes 1,500’ of existing forest roads/trails, 2,800’ of new temporary access, and 30’ of access utilizing a snow bridge/timber mats to cross the wetland ditch located along the active roadway of the Yellow River Road/FR-112. The total lengths of the proposed access routes are tabulated below in **Table 2**.

Site ID	Easting	Northing	Elevation (ft)	Type	Site ID	Easting	Northing	Elevation (ft)	Type
SL-01	688465	5018673	1343	Infill/Stepout	SL-10	688737	5018586	1321	Infill/Stepout
SL-02	688510	5018650	1355	Infill/Stepout	SL-11	688436	5018487	1358	Infill/Stepout
SL-03	688458	5018555	1365	Infill/Stepout	SL-12	688520	5018493	1363	Infill/Stepout
SL-04	688597	5018572	1351	Infill/Stepout	SL-13	688602	5018488	1363	Infill/Stepout
SL-05	688671	5018619	1339	Infill/Stepout	SL-14	688715	5018496	1328	Infill/Stepout
SL-06	688498	5018530	1367	Infill/Stepout	SL-15	688736	5018691	1326	Infill/Stepout
SL-07	688565	5018525	1363	Infill/Stepout	SL-16	688778	5018643	1321	Infill/Stepout
SL-08	688651	5018529	1351	Infill/Stepout	SL-17	688797	5018544	1314	Infill/Stepout
SL-09	688696	5018549	1338	Infill/Stepout	SL-18	68819	5018503	1327	Infill/Stepout

Table 1 Approximate drill collar locations (NAD 83, UTM Zone 15)

Proposed Access Routes (type and length)	
Access Type	Length (ft)
All Season Access - Existing Roads/Trails	1,500
All Season Access - New Temporary Access	2,150
Frozen Ground Access - New Temporary Access	650
Wetland/Water Feature - Snowbridge or Timber Mat	30
Total	4,330

Table 2 Proposed access routes

Prior to mobilizing the drill rig onto site, site preparation activities will be completed along necessary access routes, staging areas and drill sites. Site preparation will include the installation of Best Management Practices (BMPs) to minimize soil transport, clearing of small brush and trees, minor grading of uneven terrain, installation of timber mats and/or construction of snow bridges where required, and construction of an initial sump. Following the completion of site preparation, the drill rig(s) and ancillary equipment will be mobilized to the drill site.

Drilling will be completed with 1 to 3 drill rigs operating 24 hours a day (2 – 12 hour shifts), 7 days a week throughout the duration of each program. Drillholes will be constructed using HQ diameter casing with coring operation being completed with NQ or smaller diameter drill tooling. Holes may vary from vertical to inclined with variable drilled azimuths, typically drilled in a north-northwest direction. Hole depths may range from approximately 300’ to greater than 2,600’ with the total length of the drillhole being determined based on the geology encountered. The entirety of the length of each constructed drillhole will remain within the extents of the Soo Line Mineral Parcel. The total drilled footage will not exceed 23,000’.

Upon completion of a drillhole, holes will either be permanently or temporarily abandoned as required by state regulations. Holes may be left open for the purposes of extending or drilling a wedged offset hole at a later date, or for the purposes of conducting geophysical test work down the hole.

Reclamation activities will be completed as disturbed areas are no longer being utilized and will include sump abandonment, scattering of brush, back blading/regrading, and temporary or permanent stabilization of the disturbed areas with mulch and seed. Some reclamation activities, such as sump abandonment and reseeding will be completed as weather conditions permit.

Upon demobilization of all equipment, and when vehicular access to the site is no longer necessary, access routes directly off of the Yellow River Road/FR-112 will be blocked with large boulders to prevent unauthorized access by vehicles into the forest. Temporary access routes will be decommissioned.

4.2 Access, Drill sites, and Staging Areas

Access

Access to the project area will be directly off of the Yellow River Road/FR-112. Access to the drill sites off of Yellow River Road will utilize existing forest trails to the extent practical. Off of the existing forest trails, temporary access will be constructed by means of clearing a path (~15' in width) to the drill sites and will include the removal of small trees and underbrush and minor leveling in areas of uneven terrain sufficient to accommodate 4x4 access to the drill sites.

During the Fall of 2025, GLW surveyed in and flagged all access routes and approximate drill collar locations within the extents of each drill site proposed under this plan. The locations of these features are depicted in **Attachment 000 – Bend_SooLine_Plan Map**. Access routes are described in the attached plan maps in four different categories (refer to Table 2 for total lengths):

- All Season Access – Existing Access:
 - Existing, established roads/trails which do not contain any wetland impacts
- All Season Access – New Temporary Access:
 - Newly constructed temporary access routes which do not contain any wetland impacts
- Frozen Ground Access – New Temporary Access
 - Newly constructed temporary access routes for accessing drill sites located within the extents of delineated wetlands. Such routes will be utilized under frozen ground conditions and/or under authorization from the WDNR under a wetland permit
- Wetland/Water Feature – Snow Bridge/Timber Mat
 - Location of timber mat installation to span the wetland ditch in the active roadway of Yellow River Road/FR-112

Access routes, drill sites, and staging areas were located to avoid disturbances to wetlands and to avoid the removal of large trees to the best extent practical and to provide year-round accessibility to most drill sites. In some cases, wetlands could not be avoided. These situations are discussed below:

Drill sites SL-16, SL-17 and SL-18 are located within a large delineated wetland complex along the eastern portion of the Soo Line Mineral Parcel. It may be necessary to utilize these sites if favorable geology is found to continue to the east. These sites will either be accessed only during frozen ground conditions and/or will be accessed under authorization from the WDNR under a wetland permit.

A small wetland ditch exists within the active roadway of the Yellow River Road/FR-112. Wetland ditches within active roadways are exempt from requiring wetland permits. GLW will cross these narrow ditches utilizing timber matting or a snow bridge consisting of compacted snow that will span the entirety of the ditch.

The identified access routes were chosen to minimize disturbances associated with wetlands and the removal of larger trees. In cases where larger trees (>3" at breast height) need to be removed, GLW will consult with the USFS for authorization to remove such trees prior to constructing the access route. In the event that more suitable access routes are identified GLW will consult with and seek approval from both the USFS and WDNR prior to implementing any alternate proposed access.

Staging

Staging areas will be utilized for the purposes of storing ancillary equipment and supplies not located at the drill site. Staging areas for the program will be located within the same extents as those areas that were used for staging during the 2025 drilling program located along the main access just off of the Yellow River Road/FR-112 as shown in **Attachment 000 – Bend_SooLine_Plan Map**. Additionally, the extents of the previous drill sites from the 2025 program may be utilized for staging and upland drill sites constructed under this program may also be utilized for staging when those sites are not being utilized for drilling purposes.

Drill Sites

For planning purposes, drill sites are proposed to have the approximate dimensions of 50'x70' to accommodate the drill, sump, stockpiled soil, and ancillary equipment. A total of 18 potential drill sites are proposed under this plan. Based on past drilling programs, including the recent drilling completed on the project in 2025, actual disturbances associated with drill sites were much less and can typically be confined to an area of approximately 50'x50'.

4.3 Site Preparation and Sump Construction

Site Preparation Details

Drill site and access preparation may begin upon issuance of all necessary permits for conducting the drill program or at an appropriate time prior to mobilizing the drill rig to site. Prior to initiating site preparation activities, GLW will install all necessary BMPs, as outlined in GLW's General Construction Stormwater Permit, in areas where site preparation is scheduled to occur. GLW will provide notice to the USFS and WDNR prior to beginning such activities.

Site preparation will initially consist of removing brush and small trees at the drill site, along established access routes, staging areas and along new temporary access routes. Clearing activities may be completed by hand using a chainsaw, or utilizing larger equipment such as a dozer/excavator, or mulcher. In cases where mature trees (>3" at breast height) cannot be avoided, such trees will be removed in accordance with USFS requirements and guidelines and will include consultation with an USFS forester prior to removal.

An area of approximately 50'x70' has been designated as the drill site footprint. Portions of the footprint will be cleared at each drill site to accommodate the drill rig, ancillary equipment, support vehicles as well as the sump and stockpiled soil. New temporary road extensions will be cleared to a width of approximately 15'.

After clearing is completed, a D4 dozer or similar type of equipment will be used to clear large debris such as downed trees/limbs and to remove problematic stumps/boulders to allow access by 4x4 vehicles. Temporary access routes will be constructed and maintained by GLW and/or its contractors in compliance with Forest Service engineering and design specifications. Only minimal leveling of drill sites and temporary access roads is anticipated in hummocky or uneven terrain to provide access by 4x4 vehicles. No fill or installation of culverts are proposed for access roads or drill sites. However, if drainage problems are encountered along the entrance to the project area within the ditch of the Yellow River Road/FR-112, culverts and gravel approaches may be necessary.

Dependent upon the season of operations and the localities of access roads and drill sites, matting (timber mats or composite mats) may be used to reduce disturbances and to prevent excessive rutting in upland areas and may be used to cross small isolated wetlands if the installed mat can span the entirety of the wetland (i.e. crossing the wetland ditch along the active roadway along the Yellow River Road/FR-112). Placing matting within wetlands, as opposed to spanning the entirety of the wetland is considered temporary fill and will require a wetland permit through the WDNR. Matting will not be placed directly within wetlands without prior authorization.

During winter operations, snow may be removed and/or compacted along the access roads and at the drill sites prior to mobilizing drilling equipment to the drill site to allow frost to penetrate the ground as an added measure to minimize soil disturbance. Additionally, the use of timber matting along access routes and within the footprint of the drill sites may be utilized to minimize disturbance and excess rutting.

Prior to mobilizing drilling equipment along the access routes and to the drill sites, GLW will perform a visual assessment of the ground conditions to ensure they are suitable for mobilizing drilling equipment to the drill sites. Installed BMPs will be inspected and additional BMPs will be installed, as necessary, prior to mobilization of the drill rig.

After the drill site and access routes are inspected and the necessary BMPs are installed, a sump will be excavated at the drill site (see section below) and the drilling equipment

will be mobilized. Upon placement of the drill and construction of the sump, ancillary equipment and water will be brought to site and drilling operations will commence.

Sump Construction Details

Refer to **Attachment 006** - Schematic Section of Sump Showing Dewatering, Cementing, and Backfilling Process

GLW plans to use a combination of sumps located within the extents of the drill sites and cuttings containment systems such as the use of recirculation/cuttings tanks and/or centrifuges for the containment of drill cuttings and drilling fluids during drilling. All cuttings generated during the program will be disposed of within sumps as set out in Wis. Adm. Code s. NR 130.110 (2). Details pertaining to cutting management and disposal are described in detail in section 4.6.

A sump measuring approximately 20' x 20' by 10' will be constructed at each site to contain returned drill water and drill cuttings. The volume of the constructed sumps will be sufficient to accommodate drilling fluids and cuttings for all planned drilling during the program. When core drilling in bedrock, approximately 3 cubic feet (NQ-size drill tooling) of cuttings are generated per 100 feet of drilling (see **Attachment 004** for drill hole specs).

In cases where more than one drill hole is planned at a site, and where the original sump has been abandoned prior to drilling a second hole, a new sump will be dug within the extents of the drill site. Additionally, for the purposes of disposing of the residual drill water (as specified in GLW's Dewatering Permit through the WDNR), a smaller sump (~5'x5'x5') may be dug within the extents of the drill site at 1 or more drill sites (see discussion below in section 4.6).

Sumps will be excavated using a backhoe. Sumps for collecting return water and drill cuttings during drilling will be constructed along one side of the drill rig. The small sump for disposing of residual water will be located in a suitable location within the drill site foot print as the drill rig and most ancillary equipment will not be located at the drill site during disposal of water. Excavated soils (sub-soil and top-soil) will be segregated and stockpiled separately near the sump for use during sump backfilling and reclamation, respectively.

Prior to initiating drilling activities, and where "sulfide bearing cuttings" are expected to be encountered, the walls and base of the sump will be lined with a plastic liner (20-mil or greater polyvinyl chloride or polyethylene geomembrane) as outlined in Wis. Adm. Code s. NR130.110 (1) (b). A sufficient amount of liner will be used to provide enough material to be folded over the top of the cemented cutting prior to backfilling of the sump during final cuttings disposal as per Wis. Adm. Code s. NR130.110 (2) (a) (2) instructions. Stockpiled subsoil will be applied to the bottom of the lined sump to a thickness of approximately 12" to provide stability to the liner and to prevent it from floating.

Sumps will not be constructed at or below the typical groundwater level and will not be constructed within wetlands or floodplains. During the construction of the sump and prior to using the sump for drilling purposes, the sump will be inspected to determine if the sump has penetrated the normal groundwater level. If such indications exist the sump will be immediately backfilled. If a drillhole is located in an area where the groundwater level prohibits the use of sumps, a cuttings containment system (recirculation/cuttings tank or centrifuge) will be used and the cuttings for such a drillhole will be disposed of within a viable sump located at an adjacent drill site.

Refer to section 4.6 for a discussion on sump closure.

4.4 Drilling Methods, Water source, and Drilling Fluids

1) Drilling methods

Before diamond coring operations begin, hollow 5- or 10-foot-long steel casing (HQ – 3.78” diameter) is either rotary-drilled or diamond drilled through the unconsolidated glacial overburden down to solid bedrock. During the 2025 drill program, casing was installed by diamond drilling NQ diameter drill rods to solid bedrock followed by advancing HQ casing over top of the NQ drill rods. This method was found to be beneficial, based on the contractors experience and available equipment/tooling, given the thickness and bouldery nature of the unconsolidated glacial cover. Casing is driven 5-10 feet into fresh bedrock. This insures groundwater aquifers are sealed off from the bore hole to prevent cross contamination between aquifers and introduction of contaminants to groundwater. Further ground water protection is provided by using bentonite as a drilling mud during overburden drilling. The bentonite mud adds stability to the hole and prevents loss of water during the drilling operation by forming a sleeve around the wall of the drillhole that contains the drilling fluid.

The bedrock coring operation employs a diamond-impregnated bit attached to the end of a string of hollow steel rods. Each drill rod is 10 feet long and added to the rod string as the drill advances through the casing and into subsurface bedrock formations. The lead rod in the string, which has at its end the diamond bit, contains an inner tube (core barrel). Cylindrical rock core is fed into the barrel as the drill operates and continues to advance through the bedrock rock formations. The core barrel is retrieved through the hollow drill rod string as well as the casing by a wire line mechanism and emptied at a maximum of every 10-feet during the drilling operation.

Borehole orientations may vary from vertical to inclined and will be NQ (2.98”) in diameter and will be drilled to depths ranging from ~300 feet to >2,600’. In certain cases, a single drill site may accommodate more than one drillhole. In such cases, a single sump will be constructed to accommodate both holes. In the event that the second hole is

constructed after the original sump has been abandoned, a new sump will be constructed at the drill site.

The accumulated core is placed in labeled boxes that hold approximately 10 feet. The boxes are latter shipped back to a facility where a geologist examines (logs) and samples the core. Mineralized core samples are sawed in half at various intervals, bagged and sent out to a lab for assay analysis.

Depending on the geology encountered during the program it may be beneficial to use wedging techniques to drill one or more off-set holes from a single parent drillhole. This process involves permanently abandoning a completed drillhole up to a certain depth within the hole and installing a designed steel wedge within the hole at that depth. Upon installation of the wedge, drilling is resumed using standard methods. The wedge deflects the drill string (typically 1-3 degrees) and a second ‘daughter hole’ is created which continuously deviates away from the initial ‘parent’ hole. Wedging techniques may be utilized if deeper geology is targeted during this program. Wedging techniques are beneficial from a cost and cuttings generation standpoint as the amount of drilling in the upper portion of the wedged drillhole is significantly reduced. Upon completion of the wedged hole, the wedged portion of the hole is permanently abandoned along with the remaining portion of the ‘parent’ hole in accordance with State regulations.

2) Equipment

Experienced contractors will conduct diamond core drilling operations. Standard skid or tract-mounted diamond-bit core drill will be used for drilling. These types of drill rigs are 8 to 10 feet wide during transport to the site. Support equipment will include a skid-mounted rod tray, a D-4 or comparable dozer and/or excavator, and a two-or three-axle flatbed truck for transporting water, drill rod, and other equipment. Four-wheel-drive pickups and/or tracked skid steer will be used to transport personnel and service the drill rig. Vehicles and drills will be equipped with the required fire-fighting equipment. Drilling operations will consist of two 2-man crews working 12-hour shifts, 24-hours/day, seven days a week.

3) Water source

Water will be sourced as a drilling fluid from the N. Fork of the Yellow River located directly north of the Soo Line Mineral Parcel. Water will be pumped at the location of the bridge where the N. Fork of the Yellow River crosses the Yellow River Road/FR-112 as depicted on the attached plan maps (**Attachment 000** – Bend_SooLine_Plan Map).

Water consumption throughout the duration of drilling taking place during the summer of 2025 averaged ~1,200 gallons per day. This was based on total water consumption over the duration of the program. During the program, water was collected on an ‘as-needed

basis' and was not taken daily. The average water consumption on days where water was collected averaged ~3,500 gallons per day.

Water from the river will be pumped periodically, on an as-needed-basis, by a portable pump unit into a water truck or water tanks (typically having 1,000-2,000 gallon capacity) mounted on a two-or three-axle flatbed truck. A portable pump with a ~2" rubber hose containing a double screen at the intake (to reduce suction pressure) and placed towards the middle of the stream away from the banks, will be lowered below the water surface and pumped into the water tank(s) at a maximum rate of 12,000 gallons/day. Water quantities will be recorded by the drilling contractor and will be included in their daily shift reports.

The water truck will remain within or along the shoulder of the Yellow River Road during pumping operations. Absorbent matting will be placed under the portable pump and the water truck will be equipped with a 'spill kit' to ensure that no hydrocarbons are released to the environment. If circumstances arise where it may be possible for sedimentation from the pumping site to enter the river, a silt sock will be installed between the pumping site and the river. There are no planned discharges into the N. Fork of the Yellow River.

Based on Wisconsin statute 86.17(1)(1), the general public has the right to use and take water from streams running across public roads. Based on the scope and methods GLW is proposing for water collection, this activity is also exempt from requiring additional permits as it conforms with the conditions provided within the "Intake or Outfall Structure Exemption checklist #11 (R 06/19)" (**Attachment 002**). GLW also understands that intake structures cannot be installed during fish spawning seasons (April, 1 – June, 1) without written permission from the department. GLW will not collect water during this period unless approved, in writing, by the WDNR.

If it is determined that water consumption from the N. Fork of the Yellow River is or may cause detrimental environmental effects (i.e. during low flow periods during the winter), GLW may consider an alternate water source at either a municipal water supply, or from another water body. In such cases, GLW will notify the USFS and WDNR of any proposed changes and will not implement such changes until approval is received.

4) Drilling Fluids and Additives

Surface water collected from the N. Fork of the Yellow River will serve as the primary drilling fluid used during the proposed program. During drilling operations, the surface water will be treated with household chlorine bleach as prescribed in Wis. Adm. Code s. NR 812.11 and mixed to a concentration of 100 mg/L using the proportions presented in **Table 3** below.

TABLE D Disinfection of Wells			
Desired Chlorine Concentration (mg/L)	Quarts of Liquid Sodium Hypochlorite Household Bleach per 100 Gallons of Water (approximately 5% available chlorine 'regular strength')	Quarts of Liquid Sodium Hypochlorite Household Bleach per 100 Gallons of Water (approximately 8% available chlorine 'extra strength')	Pounds of Dry Calcium Hypochlorite Tablets per 100 Gallons of Water (Approximately 70% available chlorine)
100	0.7	0.4	0.14 (about 3 oz.)
200	1.4	1.0	0.30 (about 5 oz.)
300	2.2	1.5	0.40 (about 7 oz.)
400	2.9	2.0	0.50 (about 8 oz.)
500	3.6	2.4	0.60 (about 10 oz.)

Table 3 – Table D from Wis. Adm. Code s. NR 812.12 “General drilled type well Construction Requirements Outlining Mixing Quantities For Disinfecting Wells”.

Surface water (treated with chlorine) will be used as the primary drilling fluid and is occasionally mixed with other drilling products based on encountered drilling conditions. Typical drilling products used during other programs in similar geologic terrains have included the use of bentonite products and/or the use of E-Z Mud drilling polymer to aid in flushing drill cuttings out of the hole. Note that E-Z Mud is used in conjunction with bentonite and not as a replacement for bentonite. In addition, porous rocks such as limestone or dolomite formations are not present within the geology of the project area where the use of this product is not recommended.

During the 2025 drill program, bentonite products were utilized primarily for casing holes through unconsolidated glacial overburden. EZ-Mud was also used on occasion during coring (< 1 - 5 gallon container of EZ-Mud was used over the entirety of the program). While rare, additional drilling products may be beneficial to use under certain drilling conditions. GLW will only use additives approved by the department and will follow the prescribed “Uses” and “Special Conditions” for such products as set out in “*Wisconsin Department of Natural Resource Approved Drilling and Filling Sealing Products List including Heat Exchange Drillhole Products*” (**Attachment 003**). GLW will notify the WDNR if other drilling products are being considered and will not use any other approved drilling product other than a bentonite product or EZ-Mud without WDNR approval.

Chlorine additions, as well as quantities of additional products used during the drilling operations will be recorded by the drilling contractor in their daily shift reports.

4.5 Disturbances, Stormwater, and Water Management

Disturbed areas and stormwater management

GLW currently has an active General Construction Stormwater Permit (FIN: 97310) covering work completed during the 2025 summer drilling program. Proposed work under this proposed drilling program will be incorporated into the existing stormwater plan under an amendment to the Stormwater Permit. Final details pertaining to GLW's

Stormwater Management Plan will be discussed in detail within GLW's amendment to the Stormwater Permit and will be provided to both the USFS and WDNR as these details are finalized. Ground disturbing work will not be initiated until approved by the WDNR under the approved amended permit.

GLW has estimated the total potential disturbance for the drill program to be 2.76 acres. Total disturbances include the construction of up to 15 drill sites with dimensions of 50'x70' (1.16 acres), 1,530' of potential disturbances associated with access along existing forest roads/trails at a 15' width (0.51 acres), 2,800' of potential disturbance along new temporary access at 15' width (0.93 acres), and potential disturbances at laydown/staging areas (0.16 acres).

Anticipated disturbances where soil may be exposed along these features include the construction of the sump (along with the stockpiles of excavated sump material) and intermittent disturbances associated with clearing, site preparation and moving vehicles/equipment along access routes and at the drill sites (i.e., rutting). Prior to initiating soil disturbing activities, BMPs will be installed along the access routes, drill sites, and adjacent to the stockpiled sump. All areas where drilling related activities occur, including along all access routes, drill sites, laydown/staging areas, and at the water source, will be monitored throughout the program. Additional BMPs will be installed as needed and the integrity of such BMPs will be monitored to ensure they are kept in place and under stable conditions throughout the program and until final reclamation can take place.

BMPs will include the installation of silt fencing and/or silt socks placed between potential sediment source and downslope waterways and wetlands. Mulch in the form of straw and/or wood chips may also be used over areas of exposed soil to minimize the potential transport of the soil. Timber mats and/or composite matting may be utilized to minimize disturbance. Tarps may be placed over stockpiled materials to prevent mobilization of sediment.

In the event that there is a pause in the program (i.e., a gap between drilling operations and final reclamation or a pause in drilling activities due to unfavorable ground conditions), the integrity of established BMPs will be evaluated and replacement as needed. Additional BMPs will be installed as needed. During the pause in activity at the site, the integrity of such BMPs will be monitored periodically (as required under the stormwater permit) to ensure they are kept in place and under stable conditions until the program resumes or until final reclamation can be completed.

Rutting

As per USFS guidelines, rutting along existing forest roads and temporary access routes are not to exceed 12" in depth (by visible inspection). If rutting exceeds 12" in depth, access along such routes will be suspended until ruts can be repaired (back-bladed with a dozer or similar equipment) and ground conditions improve. Timber matting and/or composite matting may be utilized to prevent excessive rutting. BMPs will be installed in

such instances where exposed soils have the potential to migrate towards downslope waterways and wetlands.

Drilling Water Use, Management, and Disposal

Water used for drilling will be sourced from the N. Fork of the Yellow River and will be stored at the drill site within a water truck or within water tanks and will be chlorinated as per **Table 3** above. Water is pumped from the water truck/tanks into mud mixing tanks on the drill rig and may be mixed with drilling products as described in the above section. The water is then pumped down the drill rods to the bottom of the hole to lubricate and cool the drill bit and to flush drill cutting out of the hole. The water and cuttings return to the surface (return water) up through the drillhole and through the drill casing.

In cases where a sump is located at the drill site, the return water is then diverted from the drill collar by means of a pump or a hand dug channel to the sump. The cuttings settle out within the sump and water is then pumped back to the drill rig and reused in the drilling process. Make-up water is added as need from the water truck/tanks.

In the event that a sump is not used at a given drillhole, return water is collected in a small sump or pan (~3' diameter and 1.5' deep) located at the base of the drill collar and pumped into a recirculation/cuttings tank or centrifuge. The cuttings are allowed to settle out within the recirculation/cuttings tank or are mechanically removed within the centrifuge. The water is then reused in the drilling process. Make-up water is added as needed from the water truck/tanks.

Upon completion of the drillhole, drill cuttings and sediment within the sump or recirculation tank will be allowed time to settle out and the decanted water will be pumped into the water truck or water tanks for use during the remaining drill program. Residual water remaining at the end of the program will be disposed of within a sump and allowed to drain into the subsoils as described in section 4.6 below. GLW is currently in the process renewing/amending their active General Dewatering permit for dewatering the sumps. GLW will not commence with drilling operations until all necessary approvals pertaining to disposal of drilling water are received from the Department.

Flowing well conditions

Flowing well conditions have not been encountered on this site during past drilling programs. If flowing well conditions are encountered during this program, water will be collected within the sump and/or within the water tanks at the drill site and GLW will contact the Department for approval on how to proceed. Depending on the quantity of water being generated it may be necessary to add casing extensions above grade of the drill collar, or to permanently abandon the drill hole immediately.

Activities adjacent to or within wetlands, waterways, floodplains

In the fall of 2025, Merjent completed a detailed wetland delineation over the Bend project site. The delineated wetland features are shown in the attached plan map (**Attachment 000 – Bend_SooLine_Plan Map**) and the final report is included as **Attachment 001 – Merjent Wetland Delineation Report**. Within the extents of the Soo Line Mineral Parcel, the delineation identified a large wetland complex along the eastern boundary of the property, a continuous wetland located within the ditch of the active roadway along the Yellow River Road/FR-112, and numerous small, isolated wetland depressions typically measuring less than ~5'x5' in size.

Access to all proposed drilling will require the crossing of the small wetland ditch located within the active roadway of the Yellow River Road/FR-112. Wetlands occurring within active roadways are exempt from requiring wetland permits. For activities occurring during the winter months, snow may be compacted within the ditch to form a snow bridge to cross the entirety of the wetland. Upon completion of drilling activities, the snow will not be mechanically removed and will be allowed to thaw during warmer conditions. No fill material will be introduced into the wetland. Alternatively, and for work completed outside of the winter months, a timber mat, or composite mat, will be used to span the entirety of the wetland to provide access to the drill sites.

GLW has located access routes and drill sites to avoid wetlands to the greatest extent possible. In most cases, the footprint of the proposed drill sites and access routes have been located entirely outside of wetlands. In cases where drill sites and access routes are located adjacent to wetlands, GLW will locate and flag the wetlands, using a high-precision GPS, and will install BMPs (silt fencing and/or silt socks) prior to conducting ground disturbing activities to prevent potential sedimentation into wetlands. Further details on BMP installation and stormwater management will be included within GLW's amended Stormwater Management Plan which will be submitted with GLW's amended General Construction Stormwater Permit application. Ground disturbing work will not be initiated until the Stormwater Management Plan and Stormwater Permit have been approved by the WDNR. GLW will provide copies of all details and approvals to both the USFS and WDNR prior to initiating work.

Three drill sites located along the southeastern property boundary (SL-16, SL-17, and SL-18), along with portions of the access to these sites, are located within a large wetland complex. GLW will utilize guidelines found in Wisconsin's Forestry Best Management Practices to maintain water quality and hydrologic wetland function during drilling operations. Sumps will not be constructed at wetland sites. Drilling within these sites will require an approved wetland permit through the WDNR due to potential wetland fill associated with drillhole abandonment and the placing of temporary matting within the wetland to avoid disturbances. GLW will not initiate any work at these sites or along the access to these sites until all necessary approvals have been received by the WDNR. Copies of all documents, including application materials and approvals, will be provided to both the USFS and WDNR prior to conducting work within wetlands.

The water source is located within the floodplain along the N. Fork of the Yellow River. No disturbances are anticipated during pumping operations and the water truck will remain within the roadway or along the shoulder of the Yellow River Road at all times. No fuel storage or storage of any drilling products will take place at the water source.

4.6 Management of drill cuttings, mud, and other pollutants

Drill Cuttings Management

Drill cuttings will be contained either within sumps located at the drill sites, or, in cases where sump construction is not feasible or where it may be advantageous to dispose of cuttings within a sump at an adjacent drill site, cuttings will be contained through the use of a cuttings collection system (recirculation/cuttings tank or centrifuge).

In cases where a sump is located at the drill site, drilling fluid and drill cuttings are flushed out along the outside of the drill rods and through the casing of the drillhole and collected in a small sump or pan at the drill collar then diverted, by means of a small trench or pump to the excavated sump. Within the sump, drill cuttings settle out and drilling fluids are recirculated through the drilling process while the drill cuttings accumulate within the sump.

In cases where a cuttings collection system is used (recirculation/cuttings tank or centrifuge), cuttings and drilling fluid flushed out of the drill hole are pumped from a small sump or collection pan located at the drill collar to the collection system. Both the recirculation/cuttings tank and centrifuge are contained systems where the drilling fluid and cuttings are processed in a manner where the cuttings are removed and drilling fluid is recirculated back into the drilling process. The recirculation/cuttings tank consists of a large, enclosed, wheel mounted tank where cuttings are allowed to settle out and accumulate within the tank while drilling fluids are recirculated into the drilling process. The tank is emptied of cuttings on a periodic basis into a viable sump. A centrifuge contains a collection tank where the drilling fluids and cuttings are fed to a centrifuge which mechanically separates the cuttings from the drilling fluid. The drilling fluid is recirculated into the drilling process while the separated cuttings are collected in an appropriate container which is periodically emptied into a viable sump. For either process, while cuttings are being transported to a viable sump, drilling will not continue without an active cuttings collection system in place.

Management of “Sulfide-Bearing” and “Non-Sulfide Bearing” Cuttings

The associated geology of the Bend deposit consists of ~100-150' of unconsolidated glacial overburden overlying Precambrian bedrock. The Precambrian bedrock consists of meta-volcanic rocks of the Penokean Volcanic Belt and includes unmineralized volcanic flows, tuffs and sediments (hanging wall unit) which overly a mineralized section of sediments and tuffaceous rocks which host the Bend Volcanogenic Massive Sulfide

(VMS) deposit. The Bend VMS deposit is underlain by variably mineralized volcanic rocks (footwall unit).

Within the mineralized sections encountered during drilling (Bend VMS deposit and footwall unit), GLW expects that >50' of "metallic sulfide-bearing rock" (as defined by Wis. Adm. Code NR 130.103) will be encountered in some/all of the proposed drillholes and will consist of approximately 2% to >90%, fine to coarse-grained pyrite + chalcopyrite which are expected in the drill cuttings. Cuttings generated from these units will be collected in a lined sump or recirculation tanks and disposed of on-site within a lined sump pursuant to the final abandonment of the sumps as discussed in section 4.6.

Sulfides occur sporadically and in minor amounts within the unmineralized, upper sections of the stratigraphy (hanging wall sections) and do not meet or exceed the definition of "sulfide-bearing rock" as defined by Wis. Adm. Code NR 130.103. As with the previous drill program completed in September 2025, all cutting generated during drilling may be collected and disposed of within a lined sump as per state regulations for drillholes encountering >50' of metallic "sulfide-bearing rock". However, in cases where a cuttings collection system (recirculation/cuttings tank or centrifuge) are used, GLW may segregate the non-sulfide-bearing cuttings (glacial overburden and hanging wall unit) and contain and dispose of such cuttings in an unlined sump. As part of GLW's routine logging procedure, modal sulfide percentages are determined by the geologists and recorded. GLW will provide the logs containing the modal sulfide percentages, in instances where bedrock cuttings are contained and disposed of in unlined sumps, to confirm that cuttings generated from sulfide-bearing rock have not been mismanaged.

Drilling Fluid Management

Residual drilling water not reused for drilling and remaining at the end of the program will be disposed of along the outside of the liner, within a sump, or within a small newly excavated sump as described in section 4.6 below. (see **Attachment 006**). Dewatering activities are regulated by the WDNR under GLW's General Dewatering Permit. The existing permit will either be renewed or amended prior to initiating drilling activities.

Other

To contain materials that could be released due to equipment failure, spill containment materials and absorbent mats will be readily available at all areas containing equipment such as pumps, hoses, fuel barrows and the drill rig.

GLW shall, where applicable and appropriate, conduct its field activities in a manner that comports with "Wisconsin Forestry Best Management Practices for Water Quality Field Manual", PUB FR-093 2010, Chapter 9. For example, GLW will maintain a spill containment and clean-up kit appropriate for the materials being used at the drill site. GLW will report all hazardous substance spills (i.e. fuel or other hydrocarbons) immediately per applicable State and Federal laws.

There will be no fuel storage within wetlands or floodplains. Fuel storage containers will be kept on an upland site.

If need arises to abandon the drilling site because of a potential flood threat, the rod casing will be sealed with a watertight, threaded or welded cap and the Department will be notified.

GLW will not burn any garbage or waste at the drill site. Containers will be on the work site for trash disposal. All solid waste including trash, drill rods, empty drums, wood, plastic, etc. will be removed from the National Forest and disposed of in accordance with State solid waste management rules and National Forest regulations for removal of trash.

4.7 Drillhole and Sump Abandonment

Permanent drillhole abandonment

Permanent abandonment of drillholes will be in accordance with Wis. Adm. Code s. NR130.111 (1) (b) and requires filling the entire hole from bottom to top with concrete or neat cement. GLW will likely use neat (Portland) cement that is mixed on the drill rig (typically within a 55-gallon drum in batches that allow for the cementing of approximately 100' of drillhole) and used immediately to avoid freezing. The abandonment procedure includes the neat cement being pumped down each hole through a conductor pipe (drill rods). Rods will be removed concurrently with the filling of the drillholes with the bottom of the rods kept below the surface of the cement throughout the operation. When cement is pumped under water by a conductor pipe, the bottom end of the conductor pipe shall be submerged in the cement at all times.

Cement is mixed at the rate of one 94 lb. bag of cement to 6 gallons of water.

Attachment 004 contains the specs for drillholes, including the open volumes of a drillhole, at varying drillhole diameters. An appropriate amount of cement (at a rate of one 94 pound bag to 1.28 cubic foot of open hole) will be used to abandon the drillholes. The drilling contractor will record amounts of cement and water used in their daily reports. Drill hole specifications including diameter and length of tooling used during drilling and cement mixing ratios and quantities will be provided in the final abandonment forms for each drillhole.

Temporary drillhole abandonment

Drilling results will dictate which holes are permanently closed immediately and which are temporarily abandoned until the hole is extended, an offset wedged hole is constructed and/or downhole geophysics can be completed. All holes will be permanently abandoned per Wis. Adm. Code s. NR130.111 (1) (b) 1 when all desired work on the hole is completed. All temporarily abandoned holes will be permanently abandon within 5 years of initial construction unless an extension is granted by the

WDNR. All temporarily abandoned drillholes will follow Wis. Adm. Code s. NR130.111 (1) (a). These holes will have their surface casing capped (water tight threaded or welded cap) and maintained in a safe and secure manner until the hole is permanently abandoned. Each temporarily abandoned hole will be marked by a five-foot casing extension that is plainly visible.

Sump abandonment (*see Attachment 006_Schematic Section of Sump Showing Dewatering, Cementing, and Backfilling Process*)

Prior to final abandonment of the sumps, the cuttings and bentonite will be allowed to settle to the bottom of the pit for a minimum of 12 hours. Decanted water will be removed from the sump and will either be pumped into water tanks for re-use in the drilling process or pumped into the sump along the outside of the liner, if applicable, and allowed to drain into the unconsolidated sub soil. If there is insufficient room available to accommodate the water on the outside of the liner, and the water will not be reused in the drilling process, a small sump (approximately 5'x5'x5') will be excavated with a backhoe to contain the residual water. The additional sump will be constructed within the extents of the drill site and sub-soil and top-soil will be segregated and stockpiled separately for backfilling and reclamation purposes, respectively. The water will be allowed to drain sufficiently into the unconsolidated subsoil to prevent overflow prior to being backfilled.

GLW currently has a General Dewatering Permit covering disposal of residual, decanted drilling water in the sumps. GLW will renew or amend the existing permit prior to initiating dewatering activities.

Once the water is removed the plastic liner will either be removed or left in place prior to amending the cuttings with cement contained as prescribed in WDNR rule NR130.110 (2) (a) 2. Cement will be added at a rate of 2–94-pound bag of cement to every 3 cubic feet of cuttings generated from solid rock. Cement additions will be mixed with the cuttings using the bucket of a backhoe. The cement/cuttings mixture will be monitored to ensure proper solidification prior to the sump being backfilled. Once proper solidification has been reached, the liner will be folded over the top of the cuttings, if applicable, and the sump will be backfilled with stockpiled subsoil/topsoil as described in Wis. Adm. Code s. NR130.110 (2) a 2.

In cases where a sump contains only “non-sulfide bearing rock”, and upon removal of excess drilling fluid, the sump liner, if applicable, will either be removed or left in place prior to abandonment. Prior to backfilling the sump with stockpiled sub-soil, the cuttings will be mixed with bentonite, cement, or other clean fill.

If temperatures are too cold during winter drilling and the water freezes before the cutting and bentonite settle out, final abandonment will be postponed until weather conditions are suitable for final abandonment. Completed lined sump pits will be fenced for safety and the liner will be folded over the contained cutting and secured as to not allow water to inundate the contained cuttings until final disposal and backfilling can be completed.

4.8 Topsoil Management

The most significant soil disturbances are associated with excavation of the sump where topsoil and subsoils will be excavated, segregated, and stockpiled separately adjacent to the sump pit. Upon backfilling the sump, stockpiled topsoil is spread across the top of the reclaimed sump and will be stabilized and revegetated as weather conditions permit. If the reclaimed sump is located upon terrain where erosion of the topsoil may take place, certified weed free straw or wood chips will be placed over the topsoil to prevent transport until reseeding can be completed. If a sump constructed during the winter is not immediately backfilled and such activities are planned to occur during the following spring, erosion and sedimentation controls will be implemented as discussed previously to prevent sediment from leaving the drill area and a tarp will be secured over the topsoil stockpile to ensure its availability for use in final reclamation.

Additional disturbance to topsoil may be encountered due to site clearing and rutting caused by vehicular traffic and the movement of equipment within the extents of the drill sites and along access routes. In such cases, disturbed areas will be back-bladed by a dozer and/or raked with hand tools to ensure even distribution of topsoil prior to reseeding. If such disturbances are located upon terrain where erosion of the topsoil may take place, mulch in the form of certified weed free straw or woodchips will be placed over the topsoil to prevent transport until reseeding can be completed.

4.9 Invasive species management

GLM confirms that any equipment and vehicles brought to the site will be delivered in a clean state and free of mud/weeds/debris from previous sites. All mulch and seed mixtures used for reclamation purposes will be certified seed and weed free.

GLW will avoid known infestations of non-native invasive plant species to the greatest extent feasible. In cases where such infestations cannot be avoided, or where previously unknown infestation are identified, work will be restricted to the winter months when frozen ground conditions are consistently present, or equipment will be cleaned of all seeds, soil, mud, vegetative matter, or other debris that could contain non-native invasive plant seeds or viable plant parts prior to moving outside of the infested area. In such instances where infestations cannot be avoided, GLW will consult with the USFS and WDNR, to assess potential avoidance and/or mitigation measures prior to conducting work.

4.10 Pollution prevention

Because of the remoteness of the project area, there are no known potential pollution sources that GLM is aware of within the project area. Fuel storage tanks will be kept within upland drill site disturbance areas and staging areas during the program. They will be moved from site to site as the drilling proceeds or placed in an upland staging/laydown area as previously discussed. Spill kits will be available at all drill sites and at locations where fuel or other hydrocarbons are being stored.

There will be no drilling or construction of sump pits or storage of fuel/drilling substances within 100' of perennial or intermittent rivers and streams, lakes, or springs. No stream crossings are proposed for this program.

The drilling sites and access routes are not located within floodplains as defined by the Taylor County Floodplain map (see **Attachment 000** – Bend_SooLine_Plan Map). However, drill sites SL-15, SL-16, SL-17, and SL-18 are located near or within the extents of wetlands. There will be no fuel storage within these drill sites and spill kits will be readily available at the site during drilling. The water source for collecting drilling water is located within a floodplain along the N. Fork of the Yellow River. The water truck will be located within or along the shoulder of the Yellow River Road while collecting water and the portable pump will not be left within the floodplain while not in use. A spill kit will be available within the water truck during pumping. There will be no fuel storage or storage of drilling products within wetlands or floodplains.

4.11 Fire Prevention

Throughout the duration of the program, all equipment on site, including the drill, drilling support equipment, pickup trucks, etc. will contain readily accessible fire extinguishers. During the forest fire precautionary period, April 1st to November 15th, GLW will incorporate the following measures:

- Maintain Forest Service-approved spark arresting device on any piece of equipment operated by an internal combustion motor. In addition, each piece of motorized equipment shall be equipped with a serviceable round-pointed shovel and an operation fire extinguisher of at least five-pound rating suitable for the equipment being used. All chainsaw operators will have a serviceable round pointed shovel and a one-pound multipurpose fire extinguisher readily available.
- Operators shall require that smoking and the building of lunch or warming fires by operator's employees, contractors, or employees of contractors be confined to designated safe places where flammable debris has been cleared away and where, at the option of the Operator, smoking or the building of lunch or warming fires may be permitted.
- Adequate spark arresters shall be maintained on chimneys or stovepipes where wood or coal is being burned in an enclosed device.

4.12 Reclamation

General cleanup, permanent/temporary drillhole abandonment, initial back-blading of drill sites and access roads, stabilization of disturbed areas, as well as possible sump closure will be completed immediately upon completion of each phase of the drill program and in accordance with GLW's General Construction Stormwater Permit. Upon completion of drilling during the summer months, final reclamation including sump abandonment, seeding, mulching, etc. will be completed as disturbed areas are no longer being utilized. Upon completion of drilling during the late fall and winter months, when final reclamation activities cannot be completed immediately after drilling, final reclamation activities will be completed as ground conditions permit during the following spring. During drilling operations, as drill sites and access routes are no longer being used, drill sites and access routes will be stabilized and soil erosion control measures will be kept in place and under stable conditions until final reclamation can be completed.

GLW will notify the department as reclamation activities are completed, and will inform the department of any changes to the proposed reclamation schedule as these details become available.

Reclamation activities will include the following:

- 1) All solid and liquid waste (trash, drill rods, empty drums, wood, plastic, etc.) will be removed from the project area by the drilling contractor and disposed of in accordance with State and Federal waste management regulations.
- 2) Reclamation of the sumps will be completed per procedures outlined in Wis. Adm. Code s. NR130.110 (2) (a) 2 as discussed in section 4.6. Upon completion of backfilling and leveling the sump area to pre-existing conditions, stockpiled topsoil will be spread across the backfilled sump and the site will be reseeded and mulched using certified weed free straw.
- 3) Disturbed areas within the drill site and along access roads will be reclaimed as follows:
 - a) Disturbed and rutted areas will be back-bladed and graded to pre-existing conditions.
 - b) Where necessary, areas will be raked by hand and topsoil will be evenly distributed over disturbed areas
 - c) Cement will be removed from drill collars of permanently abandoned drillholes
 - d) Threaded, water-tight caps will be placed on temporarily abandoned drillholes
 - e) Slash (tree tops or other vegetation and brush) will be lopped and scattered:
 - i. Slash within the clearing limits of Yellow River Road/FR-112 will be removed

- ii. Slash within 100' of the clearing limits of Yellow River Road/FR-112 will be lopped and scattered to a height not to exceed 24"
 - iii. Slash within 150' of The North Fork Yellow will be lopped and scattered to a height not to exceed 24"
 - f) Pruning seal will be applied to scrapes on effected trees as directed by the USFS
 - g) All equipement will be removed from staging area, drill sites, access roads etc.
 - h) Seed and mulch will be applied to all disturbed areas; GLW ensures that weed-free straw and seed will be used in all applications.
 - i) Road Closure
 - i. All existing roads/trails not currently open to public motorized use will have closure devices replaced or installed following use
 - 1. Road closure devices will be replaced or installed at all access points from public roads
 - ii. Any temporary roads used or constructed during the program will be decommissioned after use is completed rendering the road inaccessible to all motorized traffic including ATVs
 - 1. Decommissioning will involve
 - a. Remove all matting and/or temporary stream crossings, rehab streambeds and banks
 - b. Preventing access from public roadways (above),
 - c. Limiting visibility of the reclaimed road/trail from public roadways (minimum 300')
 - d. Closure devices such as berms, boulders or downed trees may be placed along several point along the decommissioned temporary access
- 4) Areas of soil disturbance will be revegetated by seeding and mulching to prevent the transport of sediment by air/water and will include stabilization of access routes and drill sites via DNR/USFS approved, non-invasive seed mixtures and placement of weed and seed free mulch over the disturbed areas.
- i. GLW will plan to use the seed mix recommended by the USFS during the previous drilling program (table below) or other/additional seed mixtures as recommended by the USFS/WDNR

Soo Line 40 seed mix: Cover crop/native forb mix for disturbed sites on the Medford landbase with medium wet to medium dry soils.					
Soil moisture: wet to medium-dry	Common name	Scientific name	seeds/oz	lb/acre	% mix
Sun: shade to full sun	Oats	<i>Avena sativa</i>	800	5	14.07%
Cover crop included in formula.	Winter wheat	<i>Triticum aestivum</i>	750	5	14.07%
Seed source: https://www.prairiemoon.com/	Canada wild rye	<i>Elymus canadensis</i>	400	11	30.96%
* Not suitable for wetland or barrens restoration.	Virginia wild rye	<i>Elymus virginicus</i>	400	13	36.59%
** Fall seedings should include a light weed-free mulch such as oat straw.	Slender wheat grass	<i>Elymus trachycaulus</i>	6,900	1	2.81%
	Black-eyed susan	<i>Rudbeckia hirta</i>	92,000	0.075	0.21%
	Common milkweed	<i>Asclepias syriaca</i>	4,000	0.125	0.35%
	Rose milkweed	<i>Asclepias incarnata</i>	4,800	0.125	0.35%
	Round-headed bush clover	<i>Lespedeza capitata</i>	9,500	0.125	0.35%
	Wild bergamont	<i>Monarda fistulosa</i>	70,000	0.075	0.21%
				35.525	100.00%

- ii. Once disturbed areas are successfully stabilized, active BMPs (silt socks and/or silt fencing) will be removed and disposed of off-site.

Reclamation Cost Estimate (based on costs from 2025 drill program)

Total reclamation costs estimated for all reclamation activities, including drillhole and sump abandonment, back-blading drill sites and access, and manual site restoration including seeding and mulching, are estimated to be \$169,701. This includes abandonment of 3 drill holes (totaling 3,850' drilled length) that were temporarily abandoned during the 2025 drill program on the Soo Line Mineral Parcel.

GLW currently has a \$50,000 bond in place covering the estimated reclamation costs for the 2025 drill program. The past bond covered reclamation activities related to constructing 6 drill sites and associated access and staging areas and constructing 8 drillholes. The current proposed reclamation estimate includes abandonment of the 3 temporarily abandoned drillholes constructed during the 2025 program. GLW plans to utilize all disturbed and partially reclaimed areas from the 2025 drill program (access routes, drill sites, and staging areas) and has included those areas within the current reclamation estimate.

Reclamation Cost Estimate				
Item	Unit Cost \$	Units	Quantity	Total \$
Drillhole Abandonment				
Mob/Demob*	\$ 5,500.00		2	11,000
Footage - 2026 program*	\$ 3.60	\$/ft	23,000	82,800
Footage - 2025 program (holes 4, 5 and 6)*	\$ 3.60	\$/ft	3,850	13,860
Moving site to site (4 hours per move)**	\$ 325.00	\$/hour	60	19,500
Sump Abandonment (15 sumps)				
Portland Cement (1 94# bag per 50' drilled)**	\$ 20.00	94# bag	460	9,200
Excavator + Crew (4 hours/sump and backblading)**	\$ 325.00	\$/hour	60	19,500
Manual Site Reclamation/Seeding/Mulching				
Seed (Soo Line 40 Mix - \$515/acre)***	\$ 515.00	\$/acre	2.76	1,421
Mulch - (50 CWF bales/acre)**	\$ 138.00	CWF Bales	18	2,484
Labor (2 people x 6 days per acre)**	\$ 600.00	2 man crew/day	16.56	9,936
Total				169,701

*from Taconite Drilling quote - 2025

**average from 2025 program

*** quote from Prairie Moon

4.13 Cultural Resources

A limited assessment of the potential for cultural resources in the general area of the proposed exploration work has been completed by the USFS as well as the WDNR under an Endangered Resources Review. GLW will avoid all known historic properties located within and adjacent to the project area. If an unanticipated discovery of any cultural resources is identified during the course of the program, such resources, associated objects, and their soil context will be left intact and work in the immediate area will cease. GLW will immediately notify the USFS, WDNR and local law enforcement (if necessary) of such discoveries and work in the immediate area will not continue until the area has been assessed and a plan for continuation of work is formulated.

4.14 Threatened and Endangered Species

GLW understands that the Forest Service has previously completed consultation with the United States Department of Interior-Fish and Wildlife Service (USDI-F&WS) and received a verification letter of compliance with the Endangered Species Act (ESA section 7(a) (2)) for northern long-eared bat (*Myotis septentrionalis*). Other ESA protected species that may also occur in the Work Plan area are Gray Wolf (*Canis lupus*). GLW acknowledges that if its operation disturbs bald or golden eagles, additional coordination with the USDI-F&WS under the Bald and Golden Eagle Protection may be required.

Based on recent guidance from the USFS to implement avoidance measures to sensitive wildlife, GLW will incorporate the following avoidance measures into the planned operations:

- All trees larger than 3” at breast height will be preferentially cut between October 1st and April 14th. Any cutting of trees outside of this time period will be assessed on a case-by-case basis through consultation with the USFS
- No ground disturbing work will be conducted within 300m of the N. Fork of the Yellow River between April 1st and October 1st without prior consultation and approval from the USFS.

GLW has completed an Endangered Resources Review (ERR) through the WDNR for past work completed on the property. This ERR will be renewed by GLW prior to its expiry. The results of this review (received April 18, 2025) and included as **Attachment 005** indicated that 1 THR species may be present within the project area. GLW has discussed the results of the ERR with the ER Utility Liaison and will implement all required actions and will make considerations to comply with all recommended actions as

presented in the current report and will make modifications to the proposed exploration work based on any additional findings as per the renewal process.

GLW acknowledges that if any federally threatened, endangered, or candidate species are encountered in the exploration plan area after approval, a USFS representative will review the site-specific operations and identify specific measures needed for protection. State threatened, endangered or candidate species will be considered in the assessments and in case any species are encountered, the WDNR will be notified.