

March 23, 2026

**Green Light Wisconsin LLC  
2026-2027 Exploration Program  
Bend Project, Westboro Township, Taylor County**

**Notice of Intent to Drill / Plan of Operations  
Prospecting Permit – WIES 058013**

**1.0 Introduction**

As required by the Bureau of Land Management (BLM) under 43 CFR 3505.45, Green Light Wisconsin LLC (GLW), submits the following Plan of Operations for Prospecting Permit WIES 058013 (Prospecting Permit) located in T33N, R2W Sections 34 and 35 in Taylor County, Wisconsin (Figs 1 and 2). In addition, this document will be submitted to the Wisconsin Department of Natural Resources (WDNR) and will serve as GLW’s Notice of Intent to Drill (NOI) as required by Wisconsin Administrative Code Chapter NR 130 for conducting exploratory drilling in the state of Wisconsin. The permit area covers approximately 519 acres in the Chequamegon National Forest that is administered by the U.S. Forest Service (USFS) Medford District in Medford Wisconsin, approximately 16 miles to the southeast of the project area. The lands lie in the vicinity of the Bend volcanogenic massive sulfide (VMS) copper-gold-tellurium deposit which has seen considerable exploration, including extensive diamond drilling in the past. (Fig. 2)

**Fig. 1** Location map of the Bend project, Chequamegon National Forest, Taylor County, Wisconsin

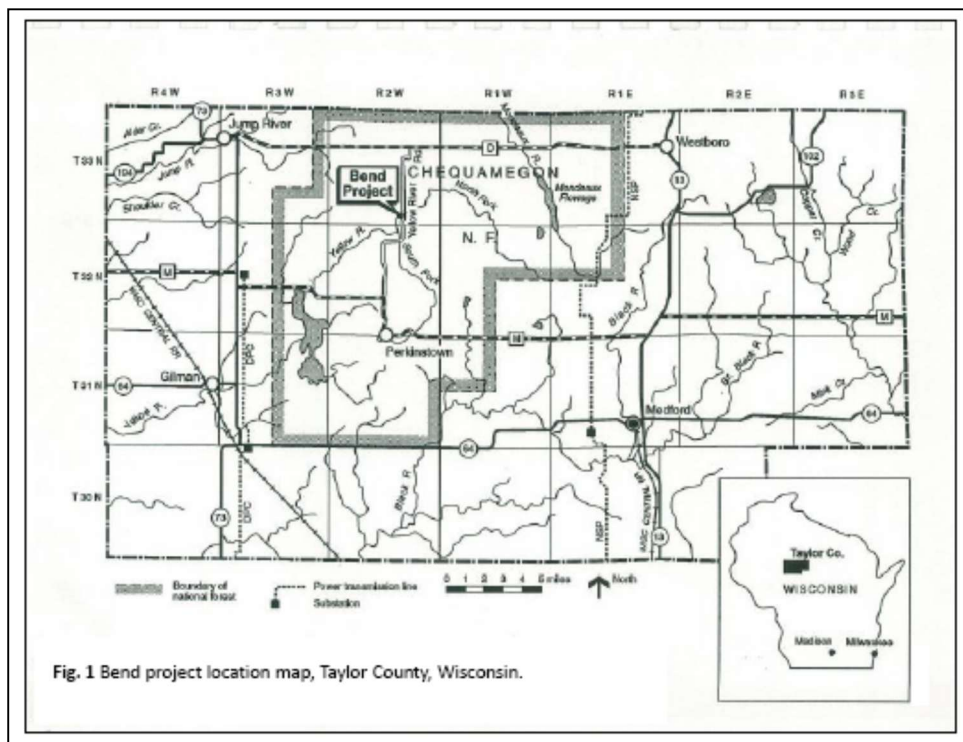
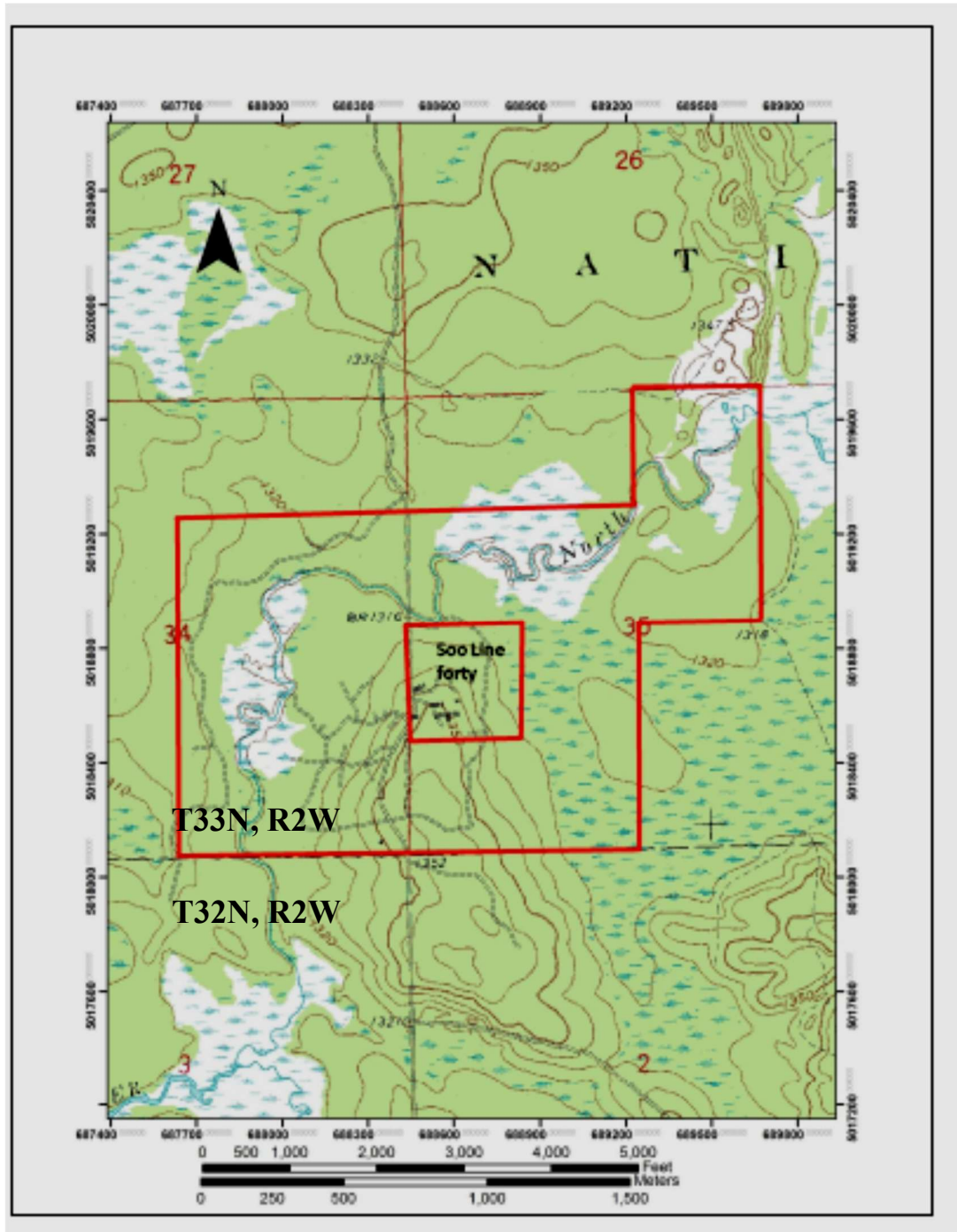


Fig. 1 Bend project location map, Taylor County, Wisconsin.

**Fig. 2** Topographic map showing the boundaries of Prospecting Permit WIES 058013; includes: SE¼; S½NE¼ Section 34 and S½ SW¼; NE¼SW¼; S½NW¼ and W½NE¼ Section 35, all in T33N, R2W. UTM grid: NAD83, Zone 15N. Contour interval on map equals 10 feet



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 a six-hole drill program during the summer of 2025 and has recently initiated a follow-up drilling program within a 40-acre parcel of privately held mineral located within the extents of the prospecting permit area (Soo Line Mineral Parcel). To date, a total 45 drillholes have been completed within the extents of the Prospecting Permit Area. An additional 13 drillholes have been drilled within the extents of the Soo Line Mineral parcel.

Exploration work proposed to be completed under this plan will consist of up to 30,000 feet of drilling from up to 25 drillholes located at 28 potential drill sites. Work is planned to commence upon receiving all federal and state approvals required to conduct the exploration work and may be completed on a periodic basis until the entire scope of work is completed. All work is anticipated to be completed within one year of beginning work.

Work under this program may be completed in parallel with exploration work currently underway on the Soo Line Mineral Parcel. Approved work on the Soo Line Mineral Parcel consists of drilling up to 20 drillholes totaling 23,000' as identified in grey in the attached plan maps. Drillholes for both programs may be temporarily abandoned for the purposes of accessing the drillhole for further exploration purposes at a later date (discussed in more detail in the sections below). GLW will not, at any given time, have more than 30,000' of temporarily abandoned drillholes (total combined hole lengths) across both the Prospecting Permit Area and the Soo Line Mineral Parcel.

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 (BLM) for review. Additional information requested of GLW by the WDNR/BLM 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 authorizations to the WDNR that are currently in place for the ongoing exploration work being conducted on the Soo Line Mineral Parcel. This includes an amendment to GLW's General Construction Stormwater Permit, a renewed Endangered Resources Review and an amended General Dewatering Permit. These permits/reviews are expected to be processed within the next several 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 certain activities within the extents of regulated wetlands. These activities are not of immediate concern for GLW's initial exploration plans. Proposed work requiring authorization under a wetland permit will not be initiated until all necessary approvals are in place. GLW requests that a

conditional approval, for all work outside of regulated wetlands, 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 - USFS Forest Plan - Mitigation Standards March 2026\_v3**) 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 ensure 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.

### **GLW Contact Information**

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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 approximately 519-acres consisting of federally owned surface and minerals within the Nicolet Chequamegon National Forest. The land (herein identified as the “Prospecting Permit Area”) is described as (**bolded where proposed work is planned**):

**T33N, R2W** - Westboro Township, Taylor County, Wisconsin

### Section 34

**W ½ SE ¼ ; E ½ SE ¼ ; S ½ NE ¼**

### Section 35

**SW ¼ SW ¼ ; SE ¼ SW ¼ ; NE ¼ SW ¼ ; SW ¼ NW ¼ ; SE ¼ NW ¼ ;  
W ½ NE ¼**

Access to the property is located directly off the Yellow River Road/FR-112, which runs through the center of the prospecting permit area, approximately 7 miles north of the town of Perkinstown (**Fig. 1**).

## 3.0 Project Schedule

Proposed work is planned to commence upon receiving all required Federal and State authorizations and permits. Exploration work is currently being conducted on the Soo Line Mineral Parcel, under previously approved authorizations, and is expected to continue through the winter of 2026/2027. Work under this Plan of Operations will be completed in parallel to work on the Soo Line Mineral Parcel. Resources (i.e. drill rigs and ancillary equipment) will likely be shared across both project areas. GLW will notify the BLM/USFS prior to initiating work on the Prospecting Permit Area and will provide a minimum 48-hour notice prior to commencing with drilling activities.

Throughout the duration of the proposed exploration work, site reclamation activities including temporary/permanent abandonment of drillholes, 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 weather conditions at site (i.e. revegetation, sump abandonment during winter conditions), such activities will be completed as weather conditions permit.

It may be necessary to temporarily suspend/pause exploration activities for operational and/or environmental purposes and resumed at a later date. GLW will inform all regulatory agencies of such pauses and plans for re-initiating work and will provide all required notices prior to resuming drilling activities.

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, depending on the duration of the pause in activities. Perimeter fencing will be installed around any open sumps, with the liner (if applicable) 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 certain permits and approvals.

Drilling activities are anticipated to be completed within one year. Upon completion of the program, final site reclamation activities will be completed immediately as weather conditions permit. All sumps will be abandoned and backfilled and disturbances within drill sites, access routes, and staging areas will be stabilized and revegetated. Regular monitoring of the site will continue until final stabilization of the site is achieved.

## **4.0 Project Details**

### **4.1 Project Scope**

GLW is proposing to conduct exploration drilling within the Prospecting Permit Area to assess the mineral potential of the Bend deposit and to test adjacent target areas to evaluate the potential for additional mineralization. Building off historic mineral resources previously identified by other exploration groups, the objectives of this proposed work are to further test the extents of mineralization of the Bend deposit to determine whether additional, follow-up drilling may be warranted.

GLW has identified and located 28 potential drill sites and associated access routes that may be utilized during the proposed program (**Attachment 000 - Bend Prospecting Permit Plan Map, and insets 000a, 000b, and 000c**). A total of up to 25 drillholes may be constructed totaling up to 30,000 feet of drilling. The actual number of drill sites utilized, drillholes constructed, and total drilled footage will be dependent upon the geology encountered throughout the duration of the program. GLW will keep both the BLM/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. In some cases, alternative access routes have been identified in order to provide year-round access to drill sites where possible. However, in some instances, access routes and/or drill sites could not be located to avoid wetlands. GLW will not initiate work within wetlands without implementing proper mitigation methods and/or operating under an approved wetland permit. Such instances are discussed in more detail in the sections below. Refer to the plan maps (**Attachment 000 - Bend Prospecting Permit Plan Map, and insets 000a, 000b, and 000c**) for locations of the proposed access and drill sites. GLW has planned a maximum total of 15,680' of potential access. The total lengths of the proposed access routes are tabulated below in **Table 2** and are discussed in more detail in the sections below.

Site ID	Easting	Northing	Elevation (ft)	Type	Site ID	Easting	Northing	Elevation (ft)	Type
PP-01	688410	5018701	1,336	Bend - Stepout	PP-15	688646	5018441	1,357	Bend - Stepout
PP-02	688399	5018583	1,335	Bend - Stepout	PP-16	688726	5018440	1,326	Bend - Stepout
PP-03	688369	5018519	1,343	Bend - Stepout	PP-17	688367	5018361	1,359	Bend - Stepout
PP-04	688266	5018522	1,324	Bend - Stepout	PP-18	688456	5018369	1,369	Bend - Stepout
PP-05	688338	5018462	1,336	Bend - Stepout	PP-19	688554	5018354	1,362	Bend - Stepout
PP-06	688219	5018474	1,320	Bend - Stepout	PP-20	688634	5018378	1,362	Bend - Stepout
PP-07	688326	5018407	1,344	Bend - Stepout	PP-21	688744	5018372	1,335	Bend - Stepout
PP-08	688245	5018372	1,343	Bend - Stepout	PP-22	688817	5018385	1,329	Bend - Stepout
PP-09	688194	5018350	1,330	Bend - Stepout	R-01	687830	5019063	1,327	Reconnaissance
PP-10	688264	5018284	1,345	Bend - Stepout	R-02	688083	5019202	1,315	Reconnaissance
PP-11	688185	5018273	1,337	Bend - Stepout	R-03	688268	5019236	1,321	Reconnaissance
PP-12	688119	5018240	1,330	Bend - Stepout	R-04	688871	5018769	1,313	Reconnaissance
PP-13	688450	5018448	1,360	Bend - Stepout	R-05	688992	5018875	1,312	Reconnaissance
PP-14	688530	5018428	1,367	Bend - Stepout	R-06	689233	5019078	1,328	Reconnaissance

**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	1,280
All Season Access - New Temporary Access	3,580
Alternate Wetland Access - Existing Roads/Trails	2,050
Alternate Wetland Access - New Temporary Access	260
Wetland Access - Existing Roads/Trails	4,750
Wetland Access - New Temporary Access	1,640
Wetland/Water Feature - Snow Bridge/Timber Mat	100
Pending Access - Existing	2,020
<b>Total</b>	<b>15,680</b>

**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 up 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. In some cases, a drillhole collared within the extents of the Prospecting Permit Area may extend onto the Soo Line Mineral Parcel at depth, and vice versa. GLW will notify the BLM/USFS and WDNR when drill holes are intended to cross the boundary between the two parcels. The entirety of all drillholes will remain within the extents of the Prospecting Permit Area/Soo Line Mineral Parcel. The total drilled footage will not exceed 30,000'.

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. GLW will not, at any given time, have more than 30,000' of temporarily abandoned drillholes (total combined hole lengths) across both the Prospecting Permit Area and the Soo Line Mineral Parcel.

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 roads/trails to the extent practical. Off 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 construction of temporary access roads and other features and during periods where features become inactive, GLW will shape and maintain the surfaces to maintain proper surface drainage.

For work occurring during the winter months, GLW may clear and/or compact snow along access routes and within staging areas and drill sites in order to drive frost into the ground to provide a solid base prior to mobilizing equipment for the purposes of minimizing ground disturbances.

Prior to utilizing existing forest roads/trails and prior to clearing temporary access routes, staging areas, and drill sites, GLW will consult with the USFS to identify any trees that may need to be removed and to identify any non-native species infestations that may need to be avoided or where other mitigation measures may need to take place. Based on this consultation, the locations of such features may be modified, as agreed upon by GLW and the USFS/WDNR, if a more desirable location for such features can be identified which may reduce impacts associated with tree removal and the avoidance of wetlands and/or non-native species infestation areas.

During the Fall of 2025, GLW surveyed in and flagged all proposed access routes and approximate drill collar locations within the extents of each drill site proposed under this plan. The locations of these features are shown in **Attachment 000 - Bend Prospecting Permit Plan Map, and insets 000a, 000b, and 000c**. Access routes are shown in the attached plan maps in eight different categories (refer to Table 2 for total lengths of proposed access):

- **All Season Access – Existing Roads/Trails:**
  - Existing, established roads/trails which do not contain any wetland impacts; provide year-round access
- **All Season Access – New Temporary Access:**
  - Newly constructed temporary access routes which do not contain any wetland impacts: provide year-round access
- **Wetland Access – Existing Roads/Trails:**
  - Existing roads/trails 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 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
- **Alternate Wetland Access – Existing Roads/Trails:**
  - Existing roads and trails crossing wetland features providing alternative access to drill sites where new temporary access has been planned to access drill sites. May be utilized under frozen ground conditions and/or under authorization from the WDNR under a wetland permit
- **Alternate Wetland Access – New Temporary Access:**
  - New temporary access crossing wetland features providing alternative access to drill sites where new temporary access has been planned to access drill sites. May 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 or snow bridge construction to span the wetland ditch in active roadway of Yellow River Road/FR-112 and small ditch wetland along access to PP-05
- **Pending Access – Existing Roads/Trails**
  - Existing gated roads accessing project area from the south located outside of the extents of the wetland delineation survey. GLW plans to have the roadway surveyed during the 2026 growing season and may propose using the road after the results of the survey are finalized. Pending authorization from the USFS/WDNR

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. As stated above, the location of certain features may be modified to mitigate against unnecessary tree removal or to avoid non-native infestation areas. Based on the desired location of certain drill holes, instances occur where wetlands could not be avoided and certain mitigation methods and/or wetland permits may be required. These situations are discussed below:

Drill sites R-1 through R-6, PP-06, and PP-22 are located and/or have access that is located within large, delineated wetland complexes. These sites, and associated access will either be accessed only during frozen ground conditions and/or will be accessed under authorization from State and/or Federal regulatory agencies under a wetland permit. GLW will not initiate work in these areas until all required authorization are received.

Access to drill sites R-1 and R-4 through R-6 will require crossing a delineated waterway. GLW plans to span the entirety of these waterways using timber matting. Crossing these waterways will likely require authorization from State

and/or Federal regulatory agencies. GLW will not initiate such activities until all required authorizations are in place.

GLW has proposed alternative access routes to some drill sites that utilize existing forest roads/trails that cross wetlands (referred to as “Alternative Wetland Access” within the legends in the attached plan maps). Initial access to these sites are also proposed and include new temporary access which avoid the wetlands in the existing roadways. GLW may utilize the alternative access routes to reduce potential disturbances associated with constructing new temporary access either under frozen ground conditions and/or under authorization under a wetland permit. GLW will not access these routes until authorization has been granted.

Narrow wetland ditches are located within the active roadway along the eastern and western edges of the Yellow River Road/FR-112. GLW has planned access across the ditches along access routes to PP-01, PP-02, and PP-17. 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.

A narrow wetland depression, approximately 2’ wide and 10’ long located within and running perpendicular to an existing forest road/trail is located between the Yellow River Road/FR-112 and drill site PP-5. GLW will install timber matting that will span the entirety of the depression.

## **Staging**

Staging areas will be utilized for the purposes of storing ancillary equipment and supplies not located at the drill site. The majority of storage will take place along and adjacent to the Yellow River Road near the access to drill site PP-05 as shown on **Attachment 000 - Bend Prospecting Permit Plan Map, and insets 000a, 000b, and 000c**. Additionally, upland drill sites constructed under this program may also be utilized for staging when those sites are not being utilized for drilling purposes. This program will take place concurrently with drilling on the Soo Line Mineral Parcel and staging areas authorized under the Soo Line Plan of Operations/NOI will likely be utilized during this program to minimize the total amount of staging areas necessary.

Two staging areas have been proposed in the Northern Reconnaissance Area (drill sites R-01 through R-03). Both areas were selected as they are natural clearings and will not require clearing of trees or ground modifications. The western staging area, located at the junction leading to drill site R-03 is located within a wetland. No unattended fuel/hydrocarbons will be stored at this location and storage will be limited to ancillary equipment and supplies (i.e. water truck, skid steer, drill rods/casing, etc.).

## **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. GLW is proposing to construct up to 25 drillholes from 28 potential drill sites. 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 ground disturbance is anticipated. 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' may 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 utilizing the constructed sump. Based on the predictable nature of the geology at the Bend deposit, GLW can reasonably estimate the total depth of drillhole prior to beginning drilling. Based on these estimates, GLW will ensure that the sump will be of sufficient size to accommodate all cuttings and drilling fluids generated for each drill hole. 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 footprint 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*

Past drilling indicates that approximately 90-115' (vertical depth) of unconsolidated glacial overburden, consisting primarily of sand with lesser silt/clay, occasional clay

layers, and sporadic gravel, cobble, and boulders, overlies the Precambrian bedrock. All drillholes constructed under this plan will be cased through the overburden and the casing will be extended into competent Precambrian bedrock. Past drilling indicates that between 90'-215' of overburden has been encountered within all past drilling with the variability primarily based on the dip of the drillhole (i.e. a hole drilled at a 45-degree angle will encounter more overburden than a vertically drilled hole). Total installed casing per drillhole is estimated to range from between ~100' to 225' per hole.

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 and 'set' in competent bedrock (typically 5-15' within the bedrock). Based on methods used during previous drilling at the Bend site, it was determined beneficial to install casing by initially drilling a pilot hole using a diamond drill bit and NQ drill rods down through unconsolidated glacial overburden into competent bedrock. HQ casing, using an HQ diameter casing shoe, is then drilled overtop of the NQ drill rod and advanced into competent bedrock. This method will be the primary approach to casing drillholes under this NOI. However, GLW may consider other techniques based on ground conditions and contractor experience. GLW will discuss any alternative methods with the WDNR prior to implementation.

During casing installation, bentonite is typically used to enhance sealing the walls of the hole through unconsolidated sediments to allow the drilling fluid and cuttings to more efficiently be returned to the surface. Note that in **Attachment 004 – Drillhole Tooling Specs**, the hole diameter reflects the drill bit/casing shoe outside diameter which is greater than that of the respective drill rod outside diameter creating a small amount of space between the drill rods and hole wall. Cuttings and drilling fluid are returned along the outside of the drill rods/casing within this space.

Bentonite is used during drilling in unconsolidated material as described above. Additionally, bentonite is used as needed during drilling in bedrock to seal open spaces to maximize water return, including at the bottom of the casing. Bentonite used both during casing through unconsolidated glacial sediments and during the initial coring of the hole provide sufficient water return indicating that the water is not being lost within the aquifer located within the glacial units.

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, or cuttings will be contained by using either a cuttings tank or centrifuge and disposed of in a viable sump elsewhere on site.

The accumulated core is placed in labeled boxes that hold approximately 10 feet. The boxes are later 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 as specified by the USFS. 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\_Prospecting\_Permit\_Plan Map**).

Water consumption throughout the duration of drilling taking place during the summer of 2025 averaged ~1,250 gallons per day. This was based on total water consumption over the duration of the program utilizing one drill rig. 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.

This plan considers employing up to 3 drills operating on the Prospecting Permit Area. Drilling under this plan will likely take place concurrently with drilling on the Soo Line Mineral Parcel. GLW proposes that up to a maximum of 4 drills may be employed and be operating simultaneously between the two sites. All drill rigs will source water from the same location. Based on the calculated averages from the 2025 program, and assuming that up to 4 drill rigs may be operating on both sites, it is estimated that an average of approximately 5,000-6,000 gallons per day may be used throughout the duration of the program with an average of 13,000-14,000 gallons being withdrawn on days where water is collected.

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). The screened intake will remain above the bed of the river at all times and will not interact with the bed of the waterway. 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, perimeter controls (silt socks or silt fencing) 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 by the WDNR 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 BLM/USFS and WDNR of any proposed changes and will not implement such changes until approval is received.

Due to the potential use of multiple drill rigs, and in an effort to reduce disturbance associated with transporting water to the drill sites, water may be pumped directly from the river to a central water tank or transported to a central water tank via the water truck. Water within the central water tank will be treated with chlorine as specified below and then pumped, on an as-needed-basis to the drill rig(s).

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 exploration work over the Bend Project area. 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 BLM/USFS and WDNR as these details are finalized. Ground disturbing work will not be initiated until approved by the WDNR under the amended permit.

GLW has estimated the maximum potential disturbance for the drill program to be 7.59 acres. Total disturbances include the construction of up to 25 drill sites with dimensions of 50'x70' (2.01 acres), 10,200' of potential disturbances associated with access along existing forest roads/trails at a ~15' width (3.51 acres), 5,480' of potential disturbance along new temporary access at ~15' width (1.89 acres), and potential disturbances at laydown/staging areas (0.18 acres). The above estimates include access routes to all 28 potential drill sites, including alternative access routes and pending access routes as described in the above sections. Total disturbance will likely be significantly reduced from the estimates.

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, staging areas 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 visual 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 and may be installed on a case-by-case basis in areas that may be susceptible to or have been subjected to excessive rutting. BMPs will be installed in such instances where exposed soils have the potential to migrate towards downslope waterways and wetlands.

### **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 or within a central water tank 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 needed 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, water tanks or to a drill at another site for use during the remaining drill program. Residual water remaining at the end of the program, or where residual water is not reused in the drill program, will be disposed of within an unlined sump and allowed to drain into the subsoils as described in section 4.6 below. GLW is currently in the process of 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 Prospecting Permit Plan Map, and insets 000a, 000b, and 000c**) 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 encompassing the Bend Deposit area to the west, east and north as well as a continuous wetland located within the east and west ditches of the active roadway along the Yellow River Road/FR-112. Two delineated waterways were also identified located along access routes to drill sites R-01 and R-04 through R-06. Additionally, numerous small, isolated wetland depressions were also identified, typically measuring less than ~5'x5' in size.

Access to the proposed drill sites 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 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 coverage under a Stormwater Permit have been approved by the WDNR. GLW will provide copies of all details and approvals to both the BLM/USFS and WDNR prior to initiating work.

Specific instances where drilling operations directly encounter wetlands are discussed in section 4.2 – Access. In some cases, GLW will employ mitigation measures to avoid impacts to the wetlands which do not require additional wetland permitting. These measures include utilizing timber matting to span the entirety of the small wetland depressions (i.e. along access to PP-05) and across the unregulated wetland ditches along the Yellow River Road/FR-112. Additionally, access routes that cross wetlands (i.e. the alternative access routes as shown in the attached plan maps), may be utilized under frozen ground conditions where snow can be compacted along the roadways to allow frost to penetrate the ground to an extent sufficient to support transport of equipment and ancillary vehicles without causing disturbance to the ground surface. In such cases, GLW will first assess the ground conditions along access routes and within the drill sites by measuring the depth of frost within the ground and will make a determination as to whether the frost is sufficient to support the equipment that will utilize the access and drill sites. Throughout the duration when such areas are being utilized for exploration, GLW will monitor the forecasted weather and will reassess the ground conditions (remeasure frost depth) if/when weather conditions have occurred that may reduce ground stability.

Wetland permitting will likely be required for certain activities occurring within wetlands including conducting drilling within wetlands and crossing delineated waterways. GLW may also plan to install timber or composite matting within wetlands at drill sites and along access routes. The matting is considered temporary fill and will require wetland permits. Throughout the wetland permitting process GLW will develop detailed plans identifying the potential impacted areas and mitigation measures. Copies of all documents, including application materials and approvals, will be provided to both the USFS and WDNR as this information becomes available. GLW will not conduct

regulated activities within wetlands until all necessary permits have been received and approval has been granted by the BLM/USFS and WDNR.

The water source, drill sites R-04, R-05, and PP-06, as well as the staging area located near R-02, are located within the floodplain as defined by Taylor County. No disturbances are anticipated during pumping operations, and the water truck will always remain within the roadway or along the shoulder of the Yellow River Road. Drill sites located within the floodplain are also located within delineated wetlands and will require wetland permits prior to initiating work within these areas. Details pertaining to wetland permitting will be provided to the BLM/USFS and WDNR as noted above. No fuel/hydrocarbon storage will take place within the floodplain.

## **4.6 Management of drill cuttings, mud, and other pollutants**

### **Drill Cuttings Management**

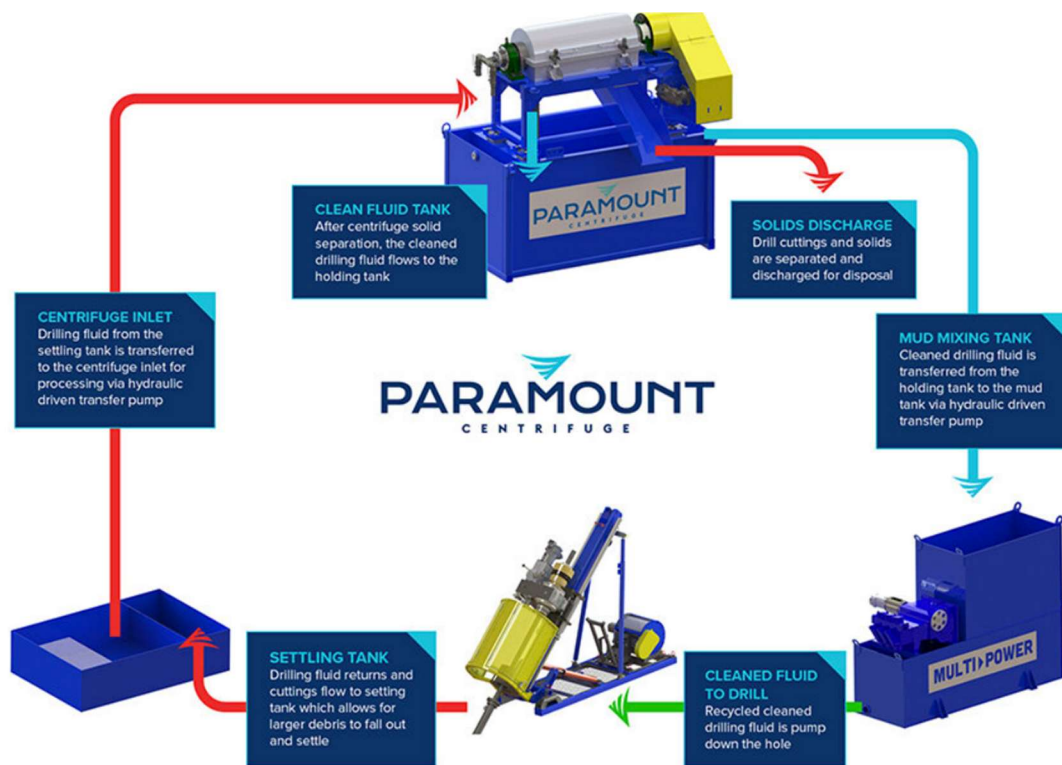
Drill cuttings will be contained either within sumps located at the drill sites, or, in cases where sump construction is not feasible or where it may be advantageous to dispose of cuttings within a sump at an adjacent drill site, cuttings will be contained through the use of a cuttings collection system (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 pumped 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. Alternatively, a return collector may be used to capture cuttings and drilling fluid to minimize disturbance at the drill collar (i.e. when drilling within wetlands). The return collector consists of PQ drill rod that is drove into the ground to a depth of approximately 5-10' overtop of the HQ casing. During drilling, all water/cuttings exiting the HQ casing remains contained within the collector (cement and/or bentonite may be used to seal the annular space between the outside diameter of the HQ casing and the inside diameter of the PQ collector). At the top of the collector, the drill rod comes to a "T" where return water/cuttings are diverted to a hose connected to a pump. The water/cuttings are then pumped to the desired location (sump or cuttings 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 (refer to the schematic below in and image of separated cuttings – **Figures 4 and 5**, respectively). 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.



*Figure 4 – Schematic showing the removal of cuttings using a centrifuge*



**Figure 5** – Image of removed cuttings using a solids removal unit (centrifuge)

### **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 overlie 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 4.7.

Sulfides are absent within the overburden and occur sporadically and in minor amounts within the unmineralized, upper sections of the stratigraphy (glacial overburden and 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 classify and segregate the

non-sulfide-bearing cuttings (glacial overburden and hanging wall unit) and dispose of such cuttings in an unlined sump.

Unlined sumps will be located within the extents of the drill site and may be located either at active or inactive drill sites and will be constructed of sufficient size to accommodate all anticipated cuttings generation. During drilling in bedrock, in cases where disposal of cuttings generated from bedrock are being considered for disposal in an unlined sump, cuttings will be collected using either a cuttings tank or centrifuge. Prior to disposal of collected cuttings, a geologist will evaluate the drill core and determine the length of any encountered intervals that exceed the criteria for classification of metallic sulfide-bearing rock (averaging greater than 3% sulfide by volume). Based on this evaluation, a determination will be made on the appropriate disposal method (lined or unlined sump). Logs containing the sulfide content as determined by GLW geologists will be made available at site at the time of disposal.

At all times, a viable lined sump will be located on site capable of containing all generated cuttings for the current drillholes. Unlined sumps will not contain cuttings generated from >50' (drilled thickness) of metallic sulfide bearing rock as required under Wis. Adm. Code NR 130.110 (2)2(b). Cuttings quantities, cuttings interval information along with drillhole ID, and location of cuttings disposal will be recorded for all sumps.

### **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 of 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 setting/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 remain submerged in the cement throughout the duration of abandonment.

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.

Upon completion of cementing the drillhole, the casing is removed and additional cement is added if settling of the cement occurs upon pulling the casing. During previous drilling programs at the Bend project, it has proved difficult to retrieve casing, likely due to the significant amount of overburden within the project area. As a potential solution, GLW may attempt to remove casing, in instances where the casing cannot be removed, by reaming over the top of the casing (HQ) with larger diameter (PQ) drill rods/casing shoe until the casing becomes free. This procedure would be completed prior to abandoning the cased portion of the drillhole and would create a larger diameter open hole through all or a portion of unconsolidated glacial overburden. GLW will document all open hole

diameters and lengths and will include these details on associated drillhole abandonment reports.

### **Temporary drillhole abandonment**

Drillholes are typically abandoned once the hole is complete but may be temporarily abandoned to complete additional work on the hole (discussed below). Upon completion of the additional work, temporarily abandoned holes will be permanently abandoned within 6 months of completing additional work. Across the entire Bend project area (Soo Line Mineral Parcel and Prospecting Permit Area) GLW will not have temporarily abandoned holes that exceed 30,000' in total open hole length.

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 when all desired exploration work on the hole is completed. 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 fully or partially removed, using the bucket of an excavator, or left in place prior to amending the cuttings with cement 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 either be folded over the top of the cuttings or excess liner may be cut and removed and the sump will be backfilled with stockpiled subsoil/topsoil as described in Wis. Adm. Code s. NR130.110 (2) a 2.

Abandonment of unlined sumps will be completed as described in Wis. Adm. Code NR 130.110 (2)2(b) for sump abandonment of sumps where drillholes have not penetrated 50' or more of metallic sulfide-bearing rock. Excess water will be removed from the sump and will be reused in the drilling process or disposed of as described in section 4.6 of GLW's NOI. Prior to backfilling the sump, the cuttings and drilling mud will be mixed, using the bucket of an excavator, with cement, bentonite, or other clean fill (stockpiled sub-soil) in a quantity sufficient to thicken the cuttings to a consistency similar to the surrounding native soil. Quantities of cement, bentonite, or clean fill (other than stockpiled sub-soil) will be tracked throughout the duration of the program. The sump will then be backfilled with stockpiled sub soil and top soil.

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 sump pits will be fenced for safety and the liner (if applicable) 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. As required under GLW's coverage under the General Construction Stormwater Permit, all stockpiles existing for more than 7 days will be covered with an anchored tarp until the stockpiled soil is backfilled into the sump during sump abandonment. 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**

GLW 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, 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.

The USFS has provided GLW with a map showing the location of identified non-native species infestation areas within the entirety of the project area. Some infestation areas are present, typically along existing forest roads/trails, within access routes proposed under this operation plan. Through conversations with the USFS it has been suggested that the extent of these areas change over time and should be evaluated prior to beginning work within potentially infested areas. Prior to initiating ground disturbing work when frozen ground conditions are not consistently present, GLW will consult with the USFS to assess the presence and extents of infestations where work is planned to occur. GLW may modify the locations of potential disturbance (i.e. access routes, drill sites) to avoid infested areas.

## **4.10 Pollution prevention**

Because of the remoteness of the project area, there are no known potential pollution sources that GLW 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.

The water source, as well as some drill sites, associated access and staging areas are located within delineated wetlands and/or the floodplain as defined by Taylor County (refer to section 4.5 and **Attachment 000 - Bend Prospecting Permit Plan Map, and insets 000a, 000b, and 000c**). There will be no unattended fuel storage within wetlands or floodplains. Fuel storage containers will be kept on upland sites. In the event that a potential flood threat arises, drilling within floodplains will be suspended and equipment and supplies will be mobilized to higher ground. A 5-10' casing extension will be placed on any open holes and will be sealed with a watertight, threaded or welded cap.

#### **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 1<sup>st</sup> to November 15<sup>th</sup>, 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, permanent/temporary 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 activities during the winter months, some reclamation activities may not be able to be completed until weather conditions are suitable for such activities (i.e. sump abandonment, final grading and revegetation). Upon completion of exploration activities in the winter months, disturbed areas will be 'back bladed' using dozer, skid steer, or excavator and temporarily stabilized using mulch (weed free straw or wood chips). BMP's installed prior to the disturbances (silt socks or silt fencing) will be inspected, repaired/replaced as necessary, and left in place until final reclamation can be completed as weather conditions permit. Additional BMP's may be installed as needed. Any remaining soil stockpiles will be securely tarped, and any open sumps will be fenced off. As per the requirements of the General Construction Stormwater Permit, the site will be inspected on a weekly basis and after rain events of >0.5" over 24 hours until final stabilization is achieved. Active BMP's will be repaired or replaced as needed until final stabilization is achieved.

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 of the Yellow river 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 equipment 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: <a href="https://www.prairiemoon.com/">https://www.prairiemoon.com/</a>	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 \$221,064 as tabulated in the table below. The reclamation cost estimate assumes reclamation costs associated with sump abandonment for all potential drilling and site reclamation associated with all potential disturbances associated with access, staging, and drill sites.

Drillholes are typically abandoned once the hole is complete but may be temporarily abandoned to complete additional work on the hole (discussed in the above sections). Upon completion of the additional work, temporarily abandoned holes will be permanently abandoned. Across the entire Bend project area (Soo Line Mineral Parcel and Prospecting Permit Area) GLW will not have temporarily abandoned holes that exceed 30,000' in total open hole length.

GLW currently has a \$185,000 bond in place with the WDNR covering the estimated reclamation costs for the 2025 drill program as well as estimated reclamation costs for work currently being completed on the Soo Line Mineral Parcel. Prior to commencing with work under this operational plan, GLW will increase the total bonded amount to the amount specified by the WDNR.

GLW acknowledges that BLM may require a federal bond under 43 CFR part 3504 before issuance of the prospecting permit. To the extent BLM determines that GLW's WDNR bond satisfies applicable federal reclamation bonding requirements, GLW will provide evidence of that bond to BLM; GLW will post any additional federal bond required by BLM prior to permit issuance.

<b>Reclamation Cost Estimate - Prospecting Permit (WIES 058013)</b>				
<u>Item</u>	<u>Unit cost \$</u>	<u>Units</u>	<u>Quantity</u>	<u>Total \$</u>
<b>Drillhole Abandonment</b>				
Mob/Demob*	\$ 5,500.00		2	\$ 11,000
Open Drillhole Footage**	\$ 3.60	\$/ft	30000	\$ 108,000
Moving site to site (4 hours per move, 25 sites)*	\$ 325.00	\$/hour	60	\$ 19,500
<b>Sump Abandonment (30,000' of drilling)</b>				
Portland Cement (1 94# bag per 50' drilled)***	\$ 20.00	94# bag	600	\$ 12,000
Excavator + Crew (4 hours/sump and backblading)***	\$ 325.00	\$/hour	100	\$ 32,500
<b>Manual Site Reclamation/Seeding/Mulching (includes all potential disturbances)</b>				
Seed (Soo Line 40 Mix - \$515/acre)****	\$ 515.00	\$/Acre	7.59	\$ 3,909
Mulch - (50 CWF bales/acre)***	\$ 18.00	CWF bales	380	\$ 6,831
Labor (2 people x 6 days per acre)***	\$ 600.00	2 man crew/day	45.54	\$ 27,324
<b>Total</b>				<b>\$ 221,064</b>
<i>*from Taconite Drilling quote - 2025 (confirmed rates for 2026)</i>				
<i>** from taconite quote (as above). Open drillhole footage represent maximum open hole footage across Soo Line Mineral Parcel and Prospecting Permit Area</i>				
<i>***average from 2025 program</i>				
<i>**** quote from Prairie Moon</i>				

### 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 (ERR). 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 the continuation of work is formulated.

### 4.14 Threatened and Endangered Species

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 1<sup>st</sup> and April 14<sup>th</sup>. 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 1<sup>st</sup> and October 1<sup>st</sup> 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 Soo Line Mineral Parcel. This ERR will be amended to include the extents of the Prospecting permit area prior to initiating work outside of the Soo Line Mineral Parcel. Upon receiving the results of the amended ERR, GLW will provide the report to the BLM/USFS and WDNR as **Attachment\_005**. GLW will implement all required actions and will make considerations to comply with all recommended actions identified in the report.

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, GLW will notify the WDNR.