

# Exhibit A

## Revised Mitigation Standards

### GreenLight Wisconsin, LLC

#### Re: Soo Line 40 Acre Mineral Estate

Location: NW1/4 SW1/4, Section 35, T33N, R2W, Taylor County

#### 1. Monitoring

- a. GreenLight Wisconsin (GLW), holder of mineral access and exploration rights to the Soo Line 40 acre mineral estate (Soo Line Minerals) shall keep the Wisconsin Department of Natural Resources (WDNR) manager informed about progress of GLW's Work Plan for the exploration of Soo Line Minerals (Work Plan). GLW will provide such information to the WDNR authorized representative, Molly Gardner, located at 101 Webster St, Madison, Wis., [email: molly.gardner@wisconsin.gov]; [phone no.715-292-911].
- b. GLW understands that both U.S. Forest Service (USFS) and WDNR personnel are expected to conduct compliance inspections of the construction, operational, and reclamation activities as specified in the Work Plan and any other activities associated with the Work Plan.

#### 2. Cultural/Heritage Resources

- a. A limited assessment of the potential for cultural resources in the general area of the Work Plan has been completed by the USFS. However, any discovery by GLW of human remains, buildings, and structures and any associated objects and their soil contexts will be left intact and immediately brought to the attention of the contracting-officer or his authorized representative. Work will cease in the immediate area of the discovery and only resume once the area has been cleared by the USFS Heritage staff.

#### 4. Threatened, Endangered Species (TES)

- a. GLW understands that the Forest Service has completed consultation with the United States Department of Interior-Fish and Wildlife Service (USDI-F&WS) and received a verification letter of compliance with the Endangered Species Act (ESA section 7(a)(2) for [REDACTED]. Other ESA protected species that may also occur in the Work Plan area are [REDACTED]. GLW acknowledges that if its operation disturbs [REDACTED] eagles, additional coordination with the USDI-F&WS under the Bald and Golden Eagle Protection may be required.
- b. 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.

#### 5. Water/Wetland Resources:

With respect to implementing the Work Plan, GLW agrees to the following:

- a. When water, wetland, or floodplain resources are present within the Work Plan area, or could be impacted for access to the area there will be no drilling or construction of sump

pits or storage of fuel/drilling substances within 100 feet of perennial, intermittent, or ephemeral rivers and streams, ponds, lakes, seeps, or springs.

- b. GLW will avoid stream and wetland crossings, riparian areas, whenever possible, when constructing temporary roads.
- c. Drilling, road use, and road construction will occur within a floodplain only during dry or frozen conditions. Possibility of early thaws, heavy rains and flooding will be considered by the USFS in a decision on when to allow occupancy within a floodplain.
- d. GLW will not conduct any dredging within wetlands. Further, there will be no placement of dredge or permanent fill material within a wetland. If some temporary fill material is needed, it will be removed following completion of drilling. No sump pits will be constructed in wetlands; re-circulation tanks will be used instead.
- e. Drilling, road use, and road construction can occur within a wetland only after these surfaces have been frozen enough or mitigation used to provide access and use without breaking through the frozen layer.
- f. If water table depths are less than 15 feet on any drilling site (generally wetlands and floodplains), then sump pits will be prohibited, and re-circulation tanks will be used. The bottom of any sump pit will be several feet above ground water. Depth of the water table will be determined when the sump pit is dug.
- g. Drilling muds and additives shall be those approved for use by the WDNR.

## **6. Road Access and Closure:**

- a. The existing transportation system will be used for access to drilling sites. New road locations and construction standards will be approved by the USFS designated agent. Roads will be constructed to the lowest standard needed for temporary access to the drill site and to mitigate surface impacts.
- b. Approaches onto existing gravel and paved roads will be designed and constructed to prevent drainage problems and road damage. Culverts and gravel approaches may be needed.
- c. Road fill and road surfaces will be stabilized and maintained during and following construction to minimize erosion and sedimentation. Vegetation, weed free mulch, riprap, and retaining walls will be used as needed.
- d. Temporary sediment traps will be used near lakes and streams during and immediately after road construction to minimize sedimentation.
- e. Road Closure: Any temporary roads used or constructed for the purpose of exploration will be closed after use is completed. Rock barriers will be used to close new access routes at their junction with Yellow River Road (FS112). Use of any Forest system road not currently open to public motorized use will have closure devices replaced or installed following use. Road closure will render a road inaccessible to all motorized traffic, including all-terrain vehicles.

## **7. Soils Resources:**

- a. Evidence of excessive rutting on access roads and drill sites would lead to road closures until conditions improve (the road dries out or freezes or other mitigation is used).
- b. Sump Pit Construction: Completed sump pits will be fenced or flagged for safety until they are backfilled. When sump use is completed, the cuttings and bentonite will be allowed to

settle to the bottom of the pit and then the water can be pumped out on the surrounding ground surface. Before the pit is backfilled, cement will be mixed with the drill cuttings as required by WDNR requirements set forth in NR130.110 (2) (a) 2.

- c. All bare soils must be revegetated upon completion of the project. To encourage natural revegetation and control soil erosion, use any/or combination of: weed free mulch, silt fence, and native or desirable non-native plant species. Seeding mixes will be approved by the USFS.

## **8. Spill containment, cleanup, and Waste Treatment:**

- a. In implementing the Work Plan, 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 immediately per applicable State and Federal laws.
- b. There will be no unattended fuel storage within wetlands or floodplains. Fuel storage containers will be kept on an upland site where practical.
- c. In floodplains, if need arises to abandon the drilling site because of a potential flood threat, then the rod casing will be sealed with a watertight, threaded or welded cap.
- d. 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, 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.

## **9. Other Biological or Botanical Resources:**

- a. Prior to bringing off road equipment onto National Forest, contractors will clean (wash) to ensure that the equipment is free of non-native, invasive species. Equipment shall be considered "clean" when a visual inspection does not identify any soil, seeds, or other such debris. This would include wood matting used to bridge the ditch line from Forest Service Road 112 or other support for equipment movement. GLW will insure, to the extent practicable, that gravel sources do not contain non-native, invasive plant species.

## **10. Final Reclamation and Drill Hole Permanent Abandonment:**

- a. All core drill holes will be permanently abandoned / closed per WDNR regulation NR130.111 within six months from the date they are no longer needed for purposes of GLM exploration program. Final reclamation of temporary access roads and drill sites will be completed within six months from the date they are no longer needed for purposes of GLM's exploration program.