

STATE OF ALASKA
2025

Application for Permits to Mine in Alaska (APMA)

Single Year Multi-year Start: 2026 Finish: 2030 APMA Number (A/F/J,Year,****) 9119

| | |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| What type activity are you planning to perform? *REQUIRED (1) <input type="checkbox"/> Suction Dredging/Reclamation <input checked="" type="checkbox"/> Reclamation Only <input type="checkbox"/> Placer Mining/ Reclamation <input type="checkbox"/> Access <input type="checkbox"/> Hardrock Exploration/ Reclamation | Surface estate of mineral properties: *REQUIRED (2) <input checked="" type="checkbox"/> State (General) <input type="checkbox"/> State (Mental Health) <input type="checkbox"/> Federal <input type="checkbox"/> Private <input type="checkbox"/> City or Borough |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

Check All That Apply: Mineral Property Owner Lessee Operator *Required (3)

Name: Delta Project LLC Primary Phone Number: 530-412-2790
 Address: 50 W Liberty St, Ste 645 Secondary Phone Number: 775-828-6070
Reno, NV 89501 Email: kristen.benchley@agnicoeagle.com

[Click here for the Department of Commerce Link](#)
 Alaska Business/Corporation Entity# 2182349 Registered Agent (Corp./LLC/LP) Corporation Service Company

Check All That Apply: Mineral Property Owner Lessee Operator *Required (4)

Name: _____ Primary Phone Number: _____
 Address: _____ Secondary Phone Number: _____
 _____ Email: _____

Alaska Business/Corporation Entity# _____ Registered Agent (Corp./LLC/LP) _____

Check All That Apply: Mineral Property Owner Lessee Operator *Required (5)

Name: _____ Primary Phone Number: _____
 Address: _____ Secondary Phone Number: _____
 _____ Email: _____

Alaska Business/Corporation Entity# _____ Registered Agent (Corp./LLC/LP) _____

Check All That Apply: Mineral Property Owner Lessee Operator *Required (6)

Name: _____ Primary Phone Number: _____
 Address: _____ Secondary Phone Number: _____
 _____ Email: _____

Attach a separate sheet for additional contacts
 Alaska Business/Corporation Entity# _____ Registered Agent (Corp./LLC/LP) _____

| | | |
|-------------------------------------------------------------|------------------------------------------------------|------------------------------------------------------------------------|
| Project Name If Applicable: (7) <u>Delta Project LLC</u> | Average Number of Workers: *REQUIRED (8) <u>2</u> | Start-Up/Shut Down: (Month/Day) (9) <u>June</u> to <u>September</u> |
|-------------------------------------------------------------|------------------------------------------------------|------------------------------------------------------------------------|

| | | |
|-----------------------------------------------------------------|-------------------------------------------------------------------------------------|---------------------------------------|
| Mining District: *REQUIRED (10) <u>Delta Mining District</u> | Applicable USGS Map(s): *REQUIRED (11) <u>Quads (1:63,360) Mt Hayes A-1, B-1</u> | On What Stream Is This Activity? (12) |
|-----------------------------------------------------------------|-------------------------------------------------------------------------------------|---------------------------------------|

| | |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------|
| Legal Description of mineral properties to be worked (MTRS) *REQUIRED (13) Example: Fairbanks Meridian Township 001N Range 003E Sections 15, 16, and 21 or F 001N 003E Sec. 15, 16, and 21 <u>Copper River Meridian Township 17N Range 7E, Township 18N, Range 7E</u> | Internal Use Only: |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------|

Internal Use Only:
 Date Application Received Complete: _____ Adjudicator: _____ LAS Entry: _____
 Sec 3 CID: _____ Sec 4 CID: _____ Sec 5 CID: _____ Sec 6 CID: _____

MINERAL PROPERTIES LIST

(14)

Properties that have previous mining disturbance requiring reclamation, active mining/exploration activities, surface improvements, location of a camp, or provides access through the claim block for mining activities. **DO NOT LIST CLAIMS UNLESS LISTED ACTIVITIES ARE ASSOCIATED WITH THEM.**

If requesting more than 12 claims, are additional sheets with ADL/BLM/USMS and legal descriptions attached? Yes No
 Are any of these mineral properties an Upland or Offshore Mining Lease? Yes No

| | ADL/BLM/USMS # | PROPERTY NAME | | ADL/BLM/USMS # | PROPERTY NAME |
|----|----------------|---------------|-----|----------------|---------------|
| 1. | ADL 657973 | Delta Project | 7. | | |
| 2. | ADL 668000 | Delta Project | 8. | | |
| 3. | ADL 668626 | Delta Project | 9. | | |
| 4. | | | 10. | | |
| 5. | | | 11. | | |
| 6. | | | 12. | | |

INVENTORY OF EQUIPMENT

(15)

List all mechanized equipment to be used (make, model, type, size, purpose, and number of each, including pumps). Attach additional sheets as necessary. If you are transporting on a trailer to the claim block, include the trailer size.

Check One:

| | Make, Model, Type, Size, Purpose of Equipment or Pump | Quantity of this type | Located on the claim block? | Transporting to claim block? |
|----|-------------------------------------------------------|-----------------------|-----------------------------|------------------------------|
| 1. | | | | |
| 2. | | | | |
| 3. | | | | |
| 4. | | | | |
| 5. | | | | |
| 6. | | | | |
| 7. | | | | |
| 8. | | | | |

ACCESS TO THE CLAIM BLOCK

(16)

Access across surface estates not owned by the State requires approval of the managing agency. It is the responsibility of the applicant to contact the owners of private property to obtain authorization for access.

When are you going to be transporting equipment and/or traveling to and from the claim block? Winter Summer

Access to the claim block crosses what type of land(s)?

State City/Borough Federal Private

Indicate type(s) Existing Access to the claim block:

- All season Road (These are public easements maintained by municipal, borough, private, or state funds for year round use). List road(s) to claim block: _____
- Existing Route or a RST/ RS 2477 Easement with a mineral base surface. If the RST/ RS 2477 Easement(s) has a State of Alaska number, please list: _____
- Navigable Waterway
- Aircraft Supported

Indicate type(s) of access to be constructed within the claim block for development of the mineral resource:

Road(s) Helicopter Pad Airstrip No Improvements or Construction Proposed

APMA 91119 Active Area

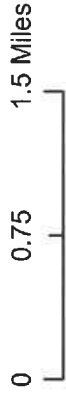


This map was created on 5/14/2026 by the Alaska Department of Natural Resources as a courtesy to supplement the application received. This map displays a graphical illustration only. Source documents remain the official record.

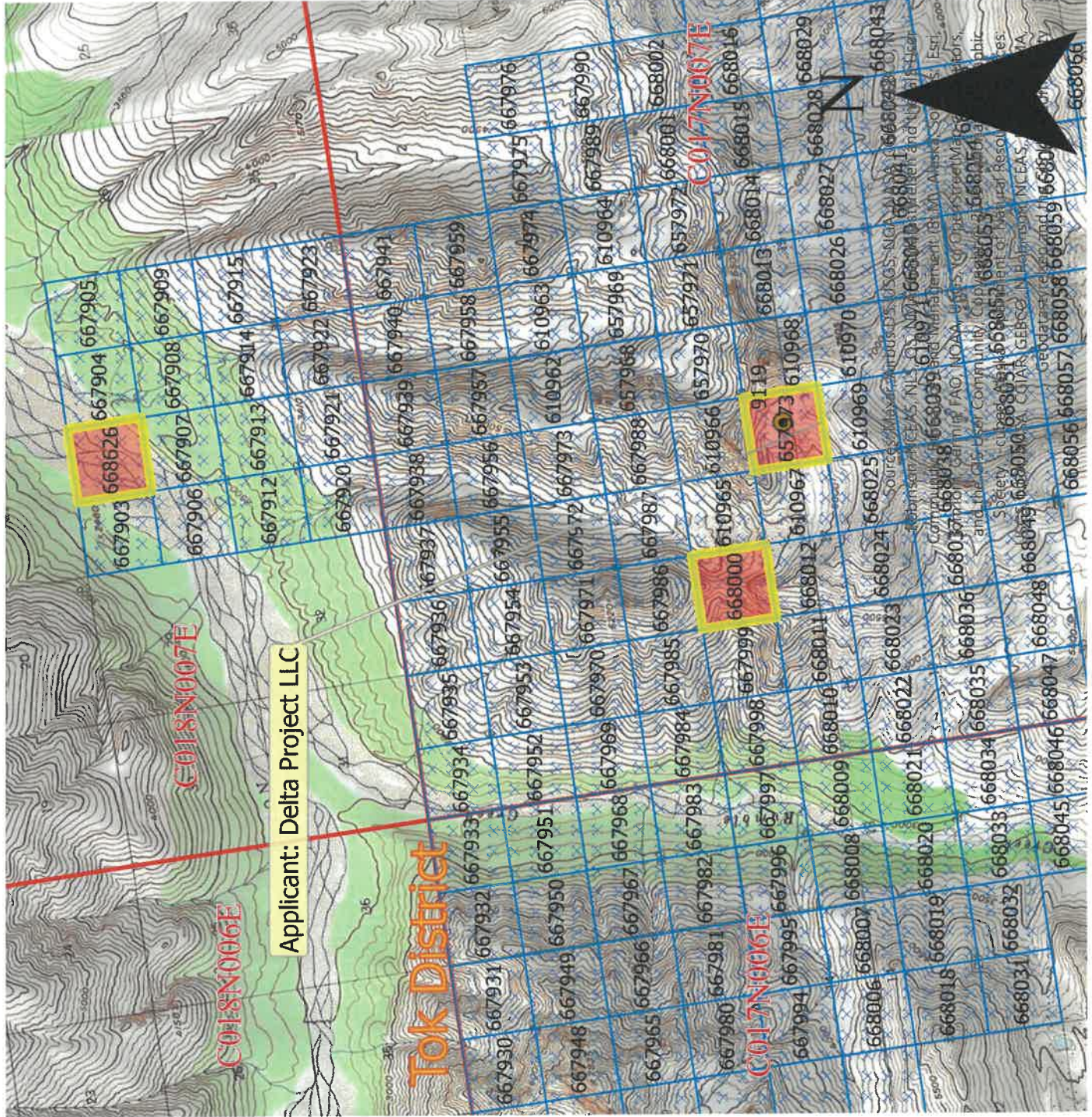
The State of Alaska makes no express or implied warranties (including warranties of merchantability and fitness) with respect to the character, function, or capabilities of electronic services or products or their appropriateness for any user's purposes. In no event will the State of Alaska be liable for any incidental, indirect, special, consequential or other damages suffered by the user or any other person or entity whether from the use of the electronic services or products, any failure thereof or otherwise, and in no event will the State of Alaska's liability to the requestor or anyone else exceed the fee paid for the electronic service or product.

Scale: 1:63,360

- Hardrock Exploration
- State Mining Claim Active



Center: 144°6'32"W 63°16'31"N



| CASE_ID | CSTMRNM | SPCLCDDSCR | CSSTSDSCR | CLAIM_NAME | NTPSTDT | RFRSHDT |
|------------|-------------------|-------------------|-------------|------------|------------------|----------------|
| ADL 657973 | DELTA PROJECT LLC | MINING CLAIM (MC) | ACTIVE (35) | MS-12 | 4/17/2007 15:49 | 5/14/2026 4:00 |
| ADL 668000 | DELTA PROJECT LLC | MINING CLAIM (MC) | ACTIVE (35) | MS 114 | 11/12/2009 13:24 | 5/14/2026 4:00 |
| ADL 668626 | DELTA PROJECT LLC | MINING CLAIM (MC) | ACTIVE (35) | MS 249 | 12/11/2009 13:25 | 5/14/2026 4:00 |

ACCESS TO CLAIM BLOCK CONTINUED

(16)

Does your travel include the staging or storage of equipment or structures off the claim block? Yes No

If Yes, describe the location and dimensions of the long term or short term parking and/or storage areas.

PETROLEUM PRODUCT STORAGE

(17)

Do you have an Oil Discharge Prevention and Contingency Plan approved by the Alaska Department of Environmental Conservation? Yes No

Do you have either a trained spill response team or a contract with a spill response company? Yes No

Describe any measures you plan to take to minimize drips or spills from leaking equipment or vehicles:

Quantity Petroleum Products to be Stored on the Project Site?

- 0-1,320 gallons of total storage (Secondary Containment recommended, but not required)
- 1,321-10,000 gallons of total storage (count only containers with a capacity of 55 gallons or greater). A self-certified Spill Prevention, Control, and Countermeasure (SPCC) plan is required and applies to all products, such as diesel fuel, gasoline, lube oil, hydraulic oil and waste oil. The self certified SPCC form can be downloaded at: <https://www.epa.gov/oil-spills-prevention-and-preparedness-regulations/tier-i-qualified-facility-spcc-plan-template>.
- 10,000+ gallons of total storage (count only containers with 55 gallons or greater storage capacity). An SPCC certified by a professional engineer is required and applies to all oil products, such as diesel fuel, gasoline, lube oil, hydraulic oil and waste oil.

Indicate Distance Stored From Flowing Waters: _____ Feet. (Minimum distance from naturally occurring water bodies required by DNR is 100 feet).

Is waste oil stored on the project site? Yes No If Yes, describe quantity and storage modality: _____

Are fuel containment berms around storage containers? Yes No Is berm area lined? Yes No

BLM operators submitting a plan of operation must submit a spill contingency plan. Notice level operations are encouraged to submit a spill contingency plan. The optional BLM Spill Contingency Plan can downloaded from: https://www.blm.gov/sites/blm.gov/files/BLM-AK_spill-contingency-plan_APMA_worksheetSup.pdf

TEMPORARY STRUCTURES/FACILITIES

(18)

Is a camp or placement of *any* temporary structure requested? Yes No

If "No", Please explain: Camp is located off Mineral Claims at Private Facility

Describe all temporary improvements (including buildings, tent platforms, out-buildings, etc., including their quantity, dimensions and building type.

What type of property is the camp located on? State Federal Private (Patented) City or Borough MHTL

If camp is on private land, provide location: _____

Proposed perimeter dimensions of camp: _____ Length (feet) _____ Width (feet).

Request use of **existing** facilities, list ADL(s): _____
 Year-Round Seasonal, from Approx. _____ to _____, annually.

Request to place **new** temporary structures, list ADL(s): _____
 Year-Round Seasonal, from Approx. _____ to _____, annually.

| | Temporary New Structures Quantity | Existing Structure Quantity | Use (Shop, office, etc.) | Dimensions (ft x ft) | Dimensions (ft x ft) | Dimensions (ft x ft) |
|---------------|-----------------------------------|-----------------------------|--------------------------|----------------------|----------------------|----------------------|
| Framed | | | | | | |
| Tent | | | | | | |
| Trailer | | | | | | |
| Platforms | | | | | | |
| Out-Buildings | | | | | | |
| Other: | | | | | | |

** If Required, list any other structures on a separate sheet, include dimensions, use, and type.*

Grey Water and Biological Waste - Describe storage and proposed method of disposal (e.g., leach line, septic, holding tank, or pit privy):

Solid Waste - Describe the types of waste that will be generated on-site including garbage, scrap metal, industrial; and describe its disposal method. *Note: For on-site disposal on state land, additional authorization is required by DEC and DNR outside of the APMA.*

What is the distance grey water, biological, and solid waste will be located from the ordinary high water mark of the nearest freshwater body (lake, stream, river, rivulet, etc.), or the mean high water mark of a saltwater body: _____

Will there be any use of animals (horses, dogs, goats/sheep, etc)? Yes No

Required: Dismantle and Removal for Structures: Provide a plan for dismantling and removing structures, equipment, and storage tanks. Include the method and timeline for restoration of all location areas.

EXPLOSIVES

(21)

Will explosives be used? Yes No If "Yes", Indicate: Type: _____ Amount: _____
 Explosive Handler's Certification/ATF Permit Numbers: _____
 Describe your blast design, blast schedule, and explosives handling plan in the project narrative.

WATER ENTRAPMENT

(22)

Will you be capturing water for use in mining operations? Yes No The entrapment is: Existing To be constructed
 Where does the water have a potential to being stored? Above ground Below ground level Both
 If above ground, what is the Length ____ ft Height ____ ft Width at crest ____ ft Width at base ____ ft of the berm(s)
 What is the purpose of the water use? Makeup water pond Settling/recycle pond Stream diversion Other _____
 How long do you expect for the entrapment to be in place Permanent 1-3 years 3-5 years 5 or more
 If above ground, how many acre-feet is the maximum capacity of water stored from ground level to crest of the berm? _____
 Total volume in acre-feet = surface area (acres) x average depth (feet) (1 acre = 43,560 square feet)
 Where is the topographic location of the water storage area? Valley bottom Hillside
 If on a hillside, Approximately how many feet is the water storage above the valley floor _____ ft

IN-STREAM ACTIVITIES and STREAM CROSSINGS

(23)

List any equipment (refer to Box 15 if necessary) that will be crossing streams (including low-water crossings along established trails/roads) or used in any natural waterbody or used in-stream:

List all stream crossings, suction dredge or pump locations, including unnamed streams.

| | Stream Name/ Water Source | NAD 83 Datum (approximate) Coordinates can be obtained using Alaska Mapper http://dnr.alaska.gov/mapper/controller | | MTRSC ¼ ¼ Ex: F001S001N01 SWSW | Check boxes to indicate type(s) of activity | | |
|----|------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------|-----------------------------------|------------------------------------------------|----------|-----------------|
| | | Latitude ddd.mmmm | Longitude -ddd.mmmm | | Crossing | Dredging | Water Intake |
| 1. | | | | | | | |
| 2. | | | | | | | |
| 3. | | | | | | | |
| 4. | | | | | | | |
| 5. | | | | | | | |

If in-stream activities and/or stream crossings are requested at more than 5 locations, please provide tabular data format.

WATER USE AUTHORIZATIONS

If water is impounded, withdrawn, or diverted, the ADNR Water Resources Section needs to review the water sources and water uses to determine if a water use authorization is needed. Water usage (including from 100% recycle pond systems) may require approval by issuing a Temporary Water Use Authorization (TWUA) or a Water Right. Information provided below will be used to determine the quantity of water that you may be authorized to use for your mining operation. When estimating water quantities, please estimate withdrawal amounts typical of a dry summer and provide the maximum quantity that you may withdraw from a particular source (e.g., stream, pond, groundwater, etc.) in a season. A TWUA application may be initiated from this APMA, unless a Water Right is requested. Please contact the ADNR, Water Resources Section at telephone number (907) 451-2790 for more information.

- Is there a current Water Right within the proposed mineral property boundary? Yes No
- If yes, provide the LAS or ADL Water Right Case File number: _____
- What are the months of water use needed (for example May 1st through October 31st)? _____

Name & Location of Water Source(s):

- If water is required **to fill** or **to maintain** water in the recycle/settling pond system check the applicable box (table below in part A) for each water source used. Please note that a recycle/settling pond system is a water source (5 sources per TWUA). Stormwater from rainfall or snowmelt do not require water use authorizations.
- Identify each water source and its geographic location using MTRS. Include Lat/Long coordinates if available.

Example: Finger Lake: Fairbanks Meridian, Township 3 North, Range 3 West, Section 20.
 MTRS: F3N3W 20
 Lat/Long: 65° 4' 15" N; 148° 12' 43" W

A. Name & Location of Water Source(s). No more than 5 water sources per TWUA. Attach list of additional sources if needed. A \$450 fee is associated with each TWUA. The APMA paperwork is all that is needed to apply for TWUAs. For example, if there are 20 sources listed in the APMA, 4 TWUA case files will be generated.
When submitting an APMA, a separate Application for Temporary use of Water form is not needed.

| Provide the geographic name or locally know name of water Source. (Recycle/settling ponds, creek, stream, well, etc.) If requesting a stream reach, clearly identify the entire stream reach on a legible map. | Meridian | Township | Range | Section(s) | Start-Up Water and/or Make-Up Water? Check each applicable box. | | | |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------|----------|-------|------------|-----------------------------------------------------------------|--------------------------|---------|--------------------------|
| <u>Example:</u> Unnamed Creek | F | 3N | 3W | 20 | Start-Up | X | Make-Up | X |
| 1. | | | | | Start-Up | <input type="checkbox"/> | Make-Up | <input type="checkbox"/> |
| | | | | Latitude: | Longitude: | | | |
| 2. | | | | | Start-Up | <input type="checkbox"/> | Make-Up | <input type="checkbox"/> |
| | | | | Latitude: | Longitude: | | | |
| 3. | | | | | Start-Up | <input type="checkbox"/> | Make-Up | <input type="checkbox"/> |
| | | | | Latitude: | Longitude: | | | |
| 4. | | | | | Start-Up | <input type="checkbox"/> | Make-Up | <input type="checkbox"/> |
| | | | | Latitude: | Longitude: | | | |
| 5. | | | | | Start-Up | <input type="checkbox"/> | Make-Up | <input type="checkbox"/> |
| | | | | Latitude: | Longitude: | | | |

WATER USE AUTHORIZATIONS CONT.

(24)

| B. Water Use Activities. Complete applicable information for each source. For recycle/settling pond system complete part C. Recycle/Settling Pond System. For stream diversions also complete Section 29. | | | | | |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------|-------------------------------------------------------|----------------------------------|----------------------|-----------------------|
| Geographic Name of Water Source <i>(Same as sources Above).</i> | Diversion (gpm/cfs) | Withdrawal Rate (gpm/pump) | Number of Pumps | Hours per Day | Days per Month |
| Describe the water use information for each source. For recycle/settling pond system complete Section C. | | | | | |
| 1. | | | | | |
| 2. | | | | | |
| 3. | | | | | |
| 4. | | | | | |
| 5. | | | | | |

| C. Recycle/Settling Pond System | Withdrawal Rate (gpm/pump) | Number of Pumps | Hours per Day | Days per Month | Additional Notes: |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------|----------------------------------|--------------------------------|-----------------------------------------|--------------------------|
| This system will also need to be listed as a water source in Section A. This entire pond system counts towards the 5 sources allowed per TWUA. Provide Length (L), Width (W), and Depth (D), of each pond. Beaver ponds or similar nature made impoundments will not be permitted for use as settling ponds. | | | | | |
| | Pond # 1: L: ___ ft W: ___ ft D: ___ ft | | | Pond # 2: L: ___ ft W: ___ ft D: ___ ft | |
| | Pond # 3: L: ___ ft W: ___ ft D: ___ ft | | | Pond # 4: L: ___ ft W: ___ ft D: ___ ft | |
| | | | | | |

| D. Camp Water Uses | Maximum # of People in Camp | Withdrawal Rate (gpm/pump) | Number of Pumps | Hours per Day | Days per Month | Source(s) of Water Well, Haul, Stream, Spring, Lake Source(s) will count towards the 5 sources identified in Section A. |
|------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------|-------------------------------------------------------|----------------------------------|--------------------------------|---------------------------------|--------------------------------------------------------------------------------------------------------------------------------------|
| Provide information on camp water uses. If an ADEC public drinking water system is used, please attach certificate to operate and/or associated documents. | | | | | | |
| Additional Notes: | | | | | | |

WASTEWATER DISCHARGE PERMIT APPLICATION

(26)

All mechanical placer mine, suction dredge, and mechanical dredge operations that discharge to a water of the U.S. require an Alaska Pollutant Discharge Elimination System (APDES) permit from DEC. See Cover Pages for a list of APDES permit fees.

Operations wishing to discharge under the APDES Small Suction Dredge General Permit (dredges with intake diameters of 6" or less, or highbankers) may skip this section but must complete annual online registrations, including \$25 fee payments, at <https://dec.alaska.gov/water/edms>.

Previously issued DEC-APDES Wastewater discharge permit #: _____

Do you want this APMA to act as an application or renewal for any of the following APDES general permits (GPs)*:

- Mechanical Placer Miners GP (open-cut terrestrial operations): Yes No
- Medium-Size Suction Dredge GP (nozzle diameter greater than 6" to 10"): Yes No
- Norton Sound Large Dredge GP (nozzle diameter greater than 10" or mechanical dredge): Yes No

Waterbody the discharge flows directly into, or would potentially flow: _____

Approximate coordinates of mine site:

Latitude: _____ Longitude: _____

Source (e.g., DNR - Alaska Mapper): _____

*Mechanical placer operations that do not elect coverage under the Mechanical Placer Miners GP may be required to obtain coverage under the Multi-Sector General Permit for Storm Water. Contact DEC to terminate a permit.

Optional* - Mixing Zone Request or Termination for Mechanical Placer Mine Operations

Do you wish to apply for a mixing zone and modified turbidity limit from DEC? Yes No

If a mixing zone is requested, provide the following:

Coordinates of discharge location: Latitude: _____ Longitude: _____

Maximum Effluent Flow anticipated from your operation _____ (GPM) [must be greater than zero (0)].

Distance to nearest downstream drinking water source _____ and downstream placer mine _____

Do you wish to terminate an active authorized mixing zone? Yes (APDES# _____) No

*A mixing zone authorizes an increase in the permit's turbidity limit based on available dilution from the surface water. Permittees without mixing zones must meet the water quality standard for turbidity at the point of discharge into the surface water.

Certification Statement – applicable only to information required for DEC authorizations (required for all DEC permit or mixing zone applicants)

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature of Responsible Party: _____

Responsible Party Name (First Last, Position) - Printed: _____

Business Name (if applicable) - Printed: _____

SECTION 404 WETLANDS PERMIT

JURISDICTIONAL DETERMINATION (CORPS JD) and MITIGATION STATEMENT

All Placer Mining applicants are required to contact the Corps of Engineers for submittal requirements.

A complete application for a Department of the Army (DA), U.S. Army Corps of Engineers (Corps) Section 404 permit includes a description of project impacts (contained in the APMA), a Jurisdictional Determination (JD) and a Mitigation Statement. The applications for the JD and the Mitigation Statement are contained in two Corps Supplements, which may be attached to this APMA. The Supplements may be downloaded from the Corps and DNR websites, or obtained directly from a Corps office in paper copy, by email, or mail. Please contact the Corps to determine what supplements are required.

The Supplements are available at: <https://www.poa.usace.army.mil/Missions/Regulatory/Placer-Mining/>

Corps Supplement, Attachment 1, Jurisdictional Determination: Attachment 1 must be filled in and submitted to the Corps for all new placer applications (New and Existing Operations). Photos of your mine site are required. Your JD will be valid for five years. Your photos will be used only for the purpose of conducting an offsite JD.

Corps Supplement, Attachment 2, Mitigation Statement: Alaska District regional mitigation policy for placer mining operations under this General Permit (GP) emphasizes avoidance and minimization of impacts; **compensatory mitigation is not required.** However, by regulation, a Mitigation Statement covering measures for avoidance, minimization, and compensatory mitigation, or, a reason why compensatory mitigation is not proposed, must be submitted to the Corps with each new APMA for projects that impact waters of the U.S.

Provide the Latitude and Longitude of the operation location (DD, NAD83):

Latitude: _____ Longitude: - _____

Source (e.g., DNR - Alaska Mapper): _____

Please list Corps permits previously issued for this site: POA- _____ - _____ , POA- _____ - _____

Certification Statement

The Alaska District will accept the APMA as a pre-construction notification, pursuant to 33 CFR 320.1 (c). Application is hereby made for a permit to authorize the work described in this APMA. I certify the information in the APMA, and any required Supplements, is complete and accurate. I further certify that I possess the authority to undertake the work described herein or am acting as the duly authorized agent of the operator/ applicant.

Operator or Agent:

Kristen Benchley



03/30/2026

Print Name

Signature

Date

PLACER/SUCTION DREDGE NARRATIVE *REQUIRED

(31)

A narrative of the operation is required. Please use this space to describe the access, mining process, environmental protection measures and reclamation measures to be used for the duration of this permit. Use multiple sheets if necessary.

DESCRIBE ACCESS, PERSONNEL HOUSING AND CAMP LAYOUT:

DESCRIBE PROGRESSIVE STEPS OF MINING METHOD:

DESCRIBE PLANNED RECLAMATION MEASURES INCLUDING TIMELINE FOR RECLAMATION TO TAKE PLACE:

DISCUSS WATER MANAGEMENT PLANS, INCLUDING USE, SOURCE, QUANTITY AND SURFACE WATER/ EROSION MANAGMENT PLAN:

DISCUSS FUEL STORAGE, HANDLING, AND SPILL PREVENTION AND RESPONSE PLANS:

DISCUSS HOW THE OPERATION WILL AVOID/MITIGATE POTENTIAL IMPACTS TO FISH, WILDLIFE AND CULTURAL RESOURCES:

HARDROCK EXPLORATION TRENCHING and DRILLING

(32)

(Indicate target and trenching locations on sketch sheet and/or topographic map)

Trenching: Yes No

Estimated number of trenches to be excavated: _____ How long will trenches be open? _____

Average Size: Length: _____ Ft. Width: _____ Ft. Depth: _____ Ft.

Drilling: Yes No

Type of Drill(s) Used: _____

Total Number of Holes _____ Diameter of Drill Rod/Casing Rod _____ (NQ/HQ/H,Etc.)

Drilled: Estimated Maximum Depth: _____ Indicate how many pumps per water source: _____

Will water be used? Yes No

Water source name(s): _____

Describe detailed drill plan, closure, plugging methodology, reclamation and abandonment in project narrative.

| Trench/Drilling Location and Mining Claim Information | | | |
|-------------------------------------------------------|---------------------|-------------------------------|-------------------------|
| Trench/Drill ID on Map | ADL/BLM/USMS NUMBER | Decimal Degrees, NAD 83 Datum | |
| | | Latitude | Longitude (approximate) |
| | | | |
| | | | |
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| | | | |
| | | | |

If more than 8 trenches/drill sites, please provide data in tabular format ([APMA tabular data template for reporting proposed activities and reclamation](#))

A narrative of the operation is required. Please attach a written narrative to this application. The narrative should include the information to answer the prompts provided below and include any additional information relevant to the proposed activities.

- 1.) Describe access to property, drill/trench sites, including length and type of access routes. Describe access reclamation measures to be conducted and timeline.
- 2.) Describe exploration method, scope of work proposed, equipment, when and where activities will occur, personnel housing location and camp description.
- 3.) Describe site preparation activities and pre-reclamation measures.
- 4.) Describe pad construction and dimensions.
- 5.) Describe drill core management, to include transportation of core, storage, and removal or disposal from the exploration project.
- 6.) Describe drill waste and drill water management, drill fluids and disposal methods. Attach msds/sds for all substances.
- 7.) Describe fuel handling at exploration drill sites (pads and trenches) and off site (camp or base operations).
- 8.) Discuss spill prevention and response plan.
- 9.) Describe water use including estimate of daily water use.
- 10.) Describe how the operation will avoid and/or mitigate potential impacts to fish, wildlife and cultural resources: describe closure, plugging methodology, surface reclamation and abandonment.



March 26, 2026

State of Alaska Department of Natural Resources
Division of Mining, Land & Water (Mining Section)
Mine Permitting Section
3700 Airport Way
Fairbanks, AK 99709

Re: 2026 Hardrock APMA F9119 NARRATIVE for Delta Project LLC

This supporting narrative is submitted to the Alaska Department of Natural Resources (ADNR), Division of Mining, Land & Water, to supplement the 2026 Hardrock APMA F9119. This narrative provides additional context regarding current project status, anticipated ownership changes, and the implementation approach for reclamation activities associated with existing disturbances on the Delta Project LLC mining claims.

The Delta Volcanogenic Massive Sulfide (VMS) Project is a historically significant metallic mineral occurrence in east-central Alaska. The project was discovered and initially explored by Resource Associates of Alaska, a Fairbanks-based exploration company that conducted mineral exploration programs throughout the State during the 1970s and 1980s and contributed materially to Alaska's understanding of its mineral endowment.

The Delta VMS Project is located on State of Alaska mining claims and represents a substantial polymetallic mineral system containing copper, lead, zinc, silver, antimony, and gold. The project is situated approximately 16 miles from the Alaska Highway and within a corridor that has been identified for potential future Alaska Railroad extension, providing long-term access potential for mineral development.

In 2003, the Alaska Department of Natural Resources, Division of Geological & Geophysical Surveys (DGGS), published *Professional Report 122*, which focused exclusively on the Delta VMS Project. That report identified an interim mineral resource of approximately 19 million tons based on available data at the time of publication. Subsequent exploration and data compilation undertaken since that time have contributed to an improved understanding of the mineral system.

The project includes an extensive drill core library generated from historic exploration programs. This archived core represents an important geological dataset that supports ongoing evaluation of the property, facilitates technical review, and provides reference material for future exploration and development planning. The core library remains a key physical record of exploration conducted on the Delta VMS Project and is

maintained to support continued stewardship and responsible management of the State's mineral resources.

Delta Project LLC, a subsidiary of Agnico Eagle, is the current holder of the State of Alaska mining claims comprising the Delta VMS Project. The claims are anticipated to be transferred to a successor owner in 2026, at which time the new owner would assume responsibility for the claims and all associated regulatory and reclamation obligations in accordance with applicable Alaska statutes and regulations.

Until such time as a claim transfer is completed, Delta Project LLC remains responsible for compliance with reclamation requirements for existing disturbances on the following claims:

List of Claims with Prior Disturbance

MS 249 ADL 668626

MS 114 ADL 668000

MS 112 ADL 657973

Permit #F13-9119 Disturbance

Delta Project LLC is the current owner of the Alaska State mining claims covered under APMA F9119. No active exploration is being conducted on site, and no new surface disturbances are proposed under this reclamation plan. Work performed on the claims for Delta Project LLC including that of prior named operators of APMA Permit #F21-9119 (Agnico Eagle USA Ltd. and Grayd Resources USA Inc.) has been limited to surface examinations and geological & geophysical surveys operating from an off-site base on private lands and causing no ground disturbance and incurring no new reclamation obligation. Access to site was entirely by aircraft & foot. Reclamation work remaining from F21-9119 disturbance: 0.0 acres; no materials left on site.

Permit #F11-9119 Disturbance

Exploration activities incurring reclamation obligation were most recently performed on the claims in 2011 by Delta Project LLC operating from an off-site base on private lands. Disturbance was related to drilling of 4 core-holes constructed on moderate terrain underlain by glacial moraine. Surface disturbance at drill sites utilized hand tools only. No mechanized excavation or blasting was employed. All timber and material were removed from sites and drill holes plugged & abandoned in the same year as the work. Access to site was entirely by aircraft & foot. Reclamation work remaining from F11-9119 disturbance: 0.0 acres; un-inventoried milled timber and iron pipe cached for future use at VAL laydown site.

History of Prior Disturbance

A record of outstanding reclamation items from prior operators is documented in correspondence dated December 11, 2013, from Agnico Eagle USA Ltd. to the Alaska Department of Natural Resources, submitted at the time of transfer of operations under APMA Permit #F13-9119 from Heatherdale Resources Ltd. to Agnico. A copy of this correspondence is included as Attachment A. Reclamation items identified as remaining at the time of transfer are summarized below.

All surface disturbances associated with historic exploration activities on the claims have been reclaimed by prior operators. Remaining site features consist of temporary structures and materials retained to support ongoing or potential future exploration activities.

Four temporary shed structures are located on State mining claim MS 249 (ADL 668626) adjacent to the south apron of the public airstrip in Section 28, Township 18 North, Range 7 East, Copper River Meridian, on a vegetated gravel bar of the Robertson River. Each structure measures approximately 8 feet by 24 feet and consists of tin roofing and plywood siding with interior shelving for storage of archived geologic materials (Photo 1). The sheds contain approximately 10,000 linear feet of rock core each, recovered from forty-four (44) drill holes completed by American Copper & Nickel Company during historic exploration programs between 1994 and 1998.

The archived drill core represents a valuable geologic reference for the property and supports geologic research, training, and future evaluation by Delta Project LLC and potential successor operators. A minor quantity of non-archival drill core is present adjacent to the sheds and exposed to weathering.

A fifth, smaller shed at the same location (approximately 12 feet by 12 feet) contains historic camp and support equipment with limited remaining utility as of 2026. PVC pipe previously used for drill hole casing, along with other rock stabilization and site protection materials, remains on the ground near the core sheds and at a designated equipment laydown area approximately 300 feet south of the sheds (Photo 2).

An empty, skid-mounted steel fuel tank (Photo 2) is located on the Robertson River gravel bar near the public airstrip. This tank was recovered from outside the Delta Project LLC claim boundaries by American Copper & Nickel Company at the request of ADNR, Division of Mining, following identification of the tank and associated fuel barrel caches as at-risk legacy materials near Rumble Creek and the Robertson River in the mid-1990s. Approximately 150 abandoned fuel barrels dating from the 1970s and 1980s were cut, removed, and disposed of offsite, and residual fluids were properly managed and incinerated. The steel tank was relocated to the airstrip on claim MS 249 (ADL

668626), where it remains staged for eventual backhaul during a future overland mobilization.

Additional temporary materials associated with historic and planned exploration remain in the central portion of the claim block in DW Valley below LP Glacier. Milled timber beams and blocks and a limited quantity of steel drill rods are cached on claim MS 114 (ADL 668012) (Photos 3 and 4). A timber-frame helicopter landing pad remains intact to support potential drilling at the adjacent, partially developed drill site located above the LP VMS outcrop on claim MS 12 (ADL 657973) (Photo 5).

Reclamation Strategy and Methods

Drill Sites

All drill pads are located on naturally unvegetated ground consisting of coarse rock debris and exposed bedrock. Reclamation at drill pad sites is limited to removal of residual materials (including metal and timbers) by helicopter and transported to appropriate recycling or disposal facilities off site. Following material removal, drill pads will be left in a stable condition consistent with surrounding surface conditions. No revegetation is proposed or required.

Metal Debris

Residual metal materials associated with historic drilling activities, including drill steel, wire, and miscellaneous scrap metal, will be collected from drill sites and support areas. These materials will be removed from site by helicopter and transported to appropriate recycling or disposal facilities off site. Removal of metal debris will eliminate remaining non-native materials and reduce long-term visual impacts. No ground disturbance is anticipated during metal removal activities.

Timber and Wood Material

Materials associated with prior exploration support activities include manufactured wood materials, such as dimensional lumber, timbers, plywood, and cardboard packaging. These materials are proposed to be burned on site, where practicable, under appropriate seasonal conditions and in compliance with applicable fire safety requirements, burn permit requirements, and land management restrictions. Burning will be conducted in a controlled manner to ensure complete combustion. Residual ash will be managed on site and left in a stable condition consistent with surrounding surface conditions. Burning of wood and cardboard materials will reduce the volume of manufactured materials remaining on the landscape and is consistent with reclamation objectives for remote project locations.

Core Sheds, Drill Core, and Plastic Materials

Existing core sheds contain drill core that is considered valuable for future evaluation and development of the project and will be maintained for continued storage unless it is determined that the core no longer has value for the project. Core sheds will be evaluated for structural integrity and future utility, and those determined to be suitable for continued use may be stabilized or improved as necessary to ensure safe and orderly storage. PVC tubing located on the Robertson River gravel bar will be removed from site for appropriate off-site disposal or recycling. Plastic bags, liners, and other plastic materials associated with drill core handling and storage that are deemed to have no future value will likewise be removed from site by helicopter for off-site disposal, where practicable. If drill core or associated materials are determined to have no future value for the project and removal is impractical due to logistical or safety constraints, limited volumes of drill core and/or plastic materials may be buried on site in discrete locations to minimize long-term surface exposure and visual impact. The objective of these measures is to retain and protect valuable project materials where appropriate, while eliminating unnecessary anthropogenic materials from the landscape and recognizing the logistical constraints associated with reclamation activities in remote terrain.

Fuel Storage Tank

The fuel storage tank located near the public airstrip on the Robertson River gravel bar will be inspected to determine usability and need. If the tank is determined to be unusable or no longer required for authorized activities, it will be disassembled and removed from the site via helicopter, consistent with the approved APMA. Should alternative removal methods be proposed, those activities will not be undertaken unless and until approved by ADNR through an APMA amendment or other written authorization. Any residual fuel or hydrocarbons will be managed and disposed of in accordance with applicable environmental and land management requirements. Following tank removal, the area will be left in a stable and safe condition.

Reclamation Phasing and Schedule

Reclamation activities described herein will be conducted incrementally over up to three field seasons to accommodate access limitations, weather conditions, and logistical constraints associated with remote site operations. The site will be accessed via helicopter from a camp/base located on private land outside the mineral claims.

Should a future exploration program be proposed within the project area, whether by Delta Project LLC or a successor claim owner, such activities would require separate permitting and approval by the State of Alaska through the Application for Permits to Mine in Alaska (APMA) process, and other applicable regulatory authorizations, prior to commencement. No new disturbance would occur.

Assuming no new permitted programs are initiated and existing materials remain unused, reclamation activities will proceed as outlined and are anticipated to be completed no later than March 30, 2030, unless modified by DNR approval or superseded by a claim transfer and successor operator plan.

Reclamation activities will be conducted consistent with Alaska reclamation standards, with the objectives of removing non-native materials, leaving disturbed areas in a stable condition, preventing unnecessary and undue degradation, and minimizing long-term environmental and visual impacts. All reclamation activities will be conducted using measures designed to avoid and minimize potential impacts to fish, wildlife, and cultural resources, and no new surface disturbance, excavation, or ground alteration will occur.

No water use is proposed or anticipated under this APMA, and no surface or groundwater withdrawals will occur in association with the permitted reclamation activities. No fuel storage or handling is proposed under this APMA, and no refueling is anticipated to occur on State lands; all access and material removal activities will be conducted by helicopter without on-site fueling.

This supporting narrative is submitted to provide additional clarification in support of the APMA for the Delta Project LLC mining claims. Delta Project LLC remains committed to working with the Alaska Department of Natural Resources to ensure reclamation obligations are met in a timely, safe, and environmentally responsible manner.

Sincerely,

Kristen Benchley
Exploration Manager, USA



Photo 1 ACNC Core Storage on MS 249, Robertson River gravel bar



Photo 2 Fuel Storage Tank on claim MS 249, Robertson River gravel bar



Photo 3 and 4 Drill Material on MS 114

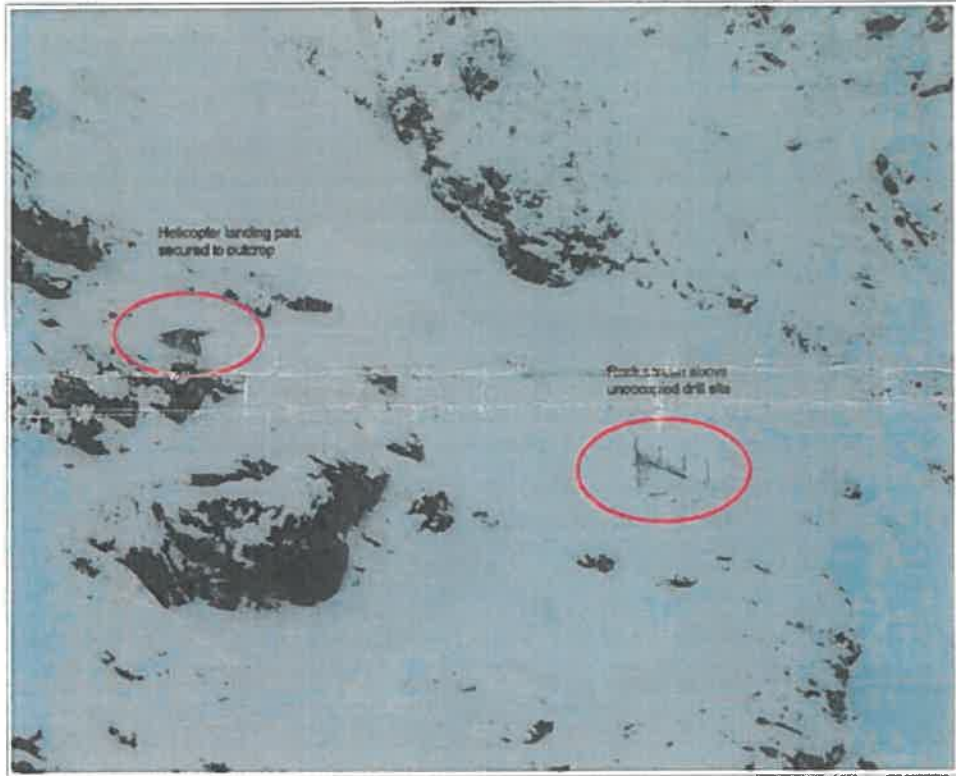


Photo 5 Helipad and old drill site on MS 12

2021 ANNUAL RECLAMATION STATEMENT

(32)

- Placer Mining
- Suction Dredging
- Hardrock Exploration

APMA # 9119

Complete and return this statement by December 31, 2021. If you did not operate, fill in your name, check bottom box, sign, and return form.

In accordance with AS 27.19 (Reclamation Act):

I, Kristen Benchley hereby file an annual reclamation statement for the 2021 mining operation described in subject Application for Permits to Mine in Alaska. (Submission of this statement does not constitute reclamation approval.)

Volume of material disturbed in 2021: 0 cubic yards (Includes strippings and processed material.)

Sluice days last season: Cubic yards of material processed daily: Annually:

Total acreage disturbed in 2021: State, Federal, Private. (Includes stripped areas, mining cuts, overburden and tailing stockpiles and disposal areas, temporary stream diversions, stream bypasses, and settling ponds.) Federal operators should include area of camp and access roads.

Length feet and Width feet of stream diversion.

Stream diversion: Temporary Permanent No Diversion (check one).

Total Area reclaimed in 2021: 0 acres.

Total un-reclaimed acres: <1 (This should match "total acreage currently disturbed" on the 2022 Reclamation Plan Form.)

For areas reclaimed, the following reclamation measures were used (check only measures that were used).

You must include photographs or videotapes of the completed reclamation work:

- Spread and contoured tailings
- Spread topsoil, vegetation, overburden muck or fines on the surface of contoured tailings
- Reestablished flood plain with stream channel in stable position
- Ponds are reclaimed
- Backfilled and reclaimed temporary stream diversions
- Camp removed, cleaned up and left free of debris
- Hardrock Exploration: Complete and submit an electronic Annual Reclamation Report



Other Reclamation Measures Taken:

Empty box for other reclamation measures taken.

Did not operate in 2021 and therefore did not conduct reclamation.

Relationship to Claim(s)

Owner Lessee Operator

Agent For:

Signed [Signature]

Date 12/19/2025

2022 RECLAMATION PLAN FORM (HARDROCK EXPLORATION)

(33)

A. RECLAMATION PLAN
 (REQUIRED if the operation will disturb five or more acres this year, OR 50,000 cubic yards, OR if the operation has a cumulative disturbed area of five or more acres).

B. RECLAMATION PLAN VOLUNTARY
 (for an operation below limits shown in Box A but wanting to qualify for the statewide bonding pool. (Operations on BLM Lands and others not filing Letter of Intent).

C. LETTER OF INTENT
 (less than five acres to be disturbed AND less than 50,000 cubic yards AND less than five acres unreclaimed area).

In accordance with Alaska Statute 27.19, reclamation is required of all mining operations. Reclamation bonding is required of operations with disturbance of 5 acres or greater. Completion of this application will meet the requirements for a "Reclamation Plan" for operations 5 acres and larger in size and for a "Letter of Intent To Do Reclamation" for operations under 5 acres. If you do not intend to use the reclamation methods presented below, you must provide additional information concerning your plans for reclamation under separate attachments.

Total acreage currently disturbed: <1 acres. This should match: "Total Unreclaimed Acres" on your 2021 Annual Reclamation Statement for Small Mines, or line #7 on your 2022 Bond Pool Renewal Form. Disturbed ground includes all unreclaimed mining and exploration activity (excluding camps and roads) since October 1991. Federal operators must include areas of camps and roads.

New acres to be disturbed in 2022 0 acres. Total acreage (currently disturbed plus new acres): <1 acres.

Acreage disturbed by land status: _____ State (general) _____ State (Mental Health) _____ Private _____ Federal

Total acreage to be reclaimed in 2022 0 acres; Total volume of material to be disturbed in 2022: 0 cubic yards.

Include strippings and overburden to be removed. Cubic yards = Length (yards) x Width (yards) x Depth (yards).

Reclamation will be conducted concurrently with activity. Reclamation will be conducted at the end of the season.

THE FOLLOWING RECLAMATION MEASURES SHALL BE USED:

(These measures are required by law. Those that do not apply may be crossed out; but, an explanation must be given.)


- Topsoil, vegetation, and overburden muck, not promptly redistributed to an area being reclaimed, will be individually separated and stockpiled for future use. This material will be protected from erosion and from contamination by acidic or toxic materials and will not be buried by tailings.
- The area reclaimed will be reshaped to blend with the surrounding area using tailings, strippings, and overburden and be stabilized.
- Stockpiled topsoil, overburden muck, will be spread over the contoured exploration sites to promote natural plant growth such that
- Exploration trenches will be backfilled. Brush piles, stumps, topsoil, and other organics will be spread on the backfilled surface to inhibit erosion and promote natural revegetation. All exploration trenches will be reclaimed by the end of the exploration season in which they are constructed, unless specifically approved by the DMLW (Mining operations are required by law to be reclaimed as contemporaneously as practicable with the mining operation to leave the site in stable condition).
- Shallow auger holes (limited to depth of overburden) will be backfilled with drill cuttings or other locally available material in such a manner that closes the hole to minimize the risk to humans, livestock and wildlife.
- All drill hole casings will be removed or cut off at, or below, ground level. All drill holes will be plugged by the end of the exploration season with bentonite holeplug or equivalent slurry, for a minimum of 10 feet within the top 20 feet of the drill hole. The remainder of the hole will be backfilled to the surface with drill cuttings. If water is encountered in any drill hole, a minimum of 7 feet of bentonite holeplug or equivalent slurry will be placed immediately above the static water level in the drill hole. (NOTE: The operator understands that complete filling of the drill holes, from bottom to top, with bentonite holeplug or equivalent slurry is also permitted and is considered to be the preferred method of hole closure, unless communicated otherwise by DMLW.)
- If artesian conditions are encountered, the operator will take all measures practicable to prevent the offsite discharge of those waters subject to 11 AAC 97.240 and will contact the DMLW for approval of hole plugging measures.
- At closure, all shafts, adits, tunnels, and air vents to underground workings will be stabilized and properly sealed to ensure protection of the public, wildlife and the environment.
- On state lands, all buildings and structures constructed, used, or improved will be removed, dismantled, or otherwise properly disposed of unless the surface owner or manager authorizes that the buildings and structures may stay.
- On state lands, all scrap iron, equipment, tools, piping, hardware, chemicals, fuels, waste, and general construction debris will be removed or properly disposed of.
- Reclamation measures taken will be consistent with any alternative post mining land use approved by the Commissioner, subject to the provisions of 11 AAC 97.300(h) and the conditions (if any) of an approved reclamation plan.

DEC 22 2025

IMPORTANT: 1. Alternative reclamation measures may be approved if the reclamation measures presented above are not applicable to your site. Please explain in separate correspondence. Submit a sketch and describe additional reclamation measures you propose to conduct at your operation. Reclamation measures must comply with AS 27.19.

BONDING: In accordance with AS 27.19, bonding is required for all operations having a mined area of ≥ five acres on State Land. This area must be bonded for \$750.00 per acre, unless the miner can demonstrate that a third party contractor can do the needed reclamation for less. The Statewide Bonding Pool may be joined by completing a bond pool application form and meeting certain requirements. No reclamation plan approval goes into effect until the bonding pool deposit and annual nonrefundable fees are paid. Use bond form to calculate area of disturbance for bonding.

BLM requires that a reclamation plan be consistent with §43 CFR 3809.420, Performance Standards for the Surface Management regulations for Federal Operations. Refer to 43 CFR 3809 or the BLM minerals website available at: <https://www.blm.gov/programs/energy-and-minerals/mining-and-minerals> for more information on what is needed for a reclamation plan on Federal lands, as they may be different than those identified above.

Kristen Benchley
 Printed name (Applicant)

 Signature (Applicant)

Relationship to Mineral Property:

Owner Lessee Operator
 Agent For: _____

Date: 12/19/2025

APMA #: 9119

2023 ANNUAL RECLAMATION STATEMENT

(33)

- Placer Mining
- Suction Dredging
- Hardrock Exploration

APMA # 9119

Complete and return this statement by December 31, 2023. If you did not operate, fill in your name, check bottom box, sign, and return form.

In accordance with AS 27.19 (Reclamation Act):

I, Kristen Benchley hereby file an annual reclamation statement for the 2023 mining operation described in subject Application for Permits to Mine in Alaska. (Submission of this statement does not constitute reclamation approval.)

Volume of material disturbed in 2023: 0 cubic yards (Includes strippings and processed material.)

Sluice days last season: _____ Cubic yards of material processed daily: _____ Annually: _____

Total acreage disturbed in 2023: State _____, Federal _____, Private _____. (Includes stripped areas, mining cuts, overburden and tailing stockpiles and disposal areas, temporary stream diversions, stream bypasses, and settling ponds.) Federal operators should include area of camp and access roads.

Length _____ feet and Width _____ feet of stream diversion.

Stream diversion: Temporary Permanent No Diversion (check one).

Total Area reclaimed in 2023: 0 acres.

Total un-reclaimed acres: <1 (This should match "total acreage currently disturbed" on the 2024 Reclamation Plan Form.)

For areas reclaimed, the following reclamation measures were used (check only measures that were used).

You must include photographs or videotapes of the completed reclamation work:

- Spread and contoured tailings
- Spread topsoil, vegetation, overburden muck or fines on the surface of contoured tailings
- Reestablished flood plain with stream channel in stable position
- Ponds are reclaimed
- Backfilled and reclaimed temporary stream diversions
- Camp removed, cleaned up and left free of debris
- Hardrock Exploration: Complete and submit an electronic Annual Reclamation Report



Other Reclamation Measures Taken:

Did not operate in 2023 and therefore did not conduct reclamation.

Relationship to Claim(s)

- Owner Lessee Operator
- Agent For: _____

Signed Kristen Benchley

Date 12/19/2025

2024 RECLAMATION PLAN FORM (HARDROCK EXPLORATION)

| | | |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <input type="checkbox"/> A. RECLAMATION PLAN (REQUIRED if the operation will disturb five or more acres this year, OR 50,000 cubic yards, OR if the operation has a cumulative disturbed area of five or more acres). | <input type="checkbox"/> B. RECLAMATION PLAN VOLUNTARY (for an operation below limits shown in Box A but wanting to qualify for the statewide bonding pool. (Operations on BLM Lands and others not filing Letter of Intent). | <input checked="" type="checkbox"/> C. LETTER OF INTENT (34) (less than five acres to be disturbed AND less than 50,000 cubic yards AND less than five acres unreclaimed area). |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

In accordance with Alaska Statute 27.19, reclamation is required of all mining operations. Reclamation bonding is required of operations with disturbance of 5 acres or greater. Completion of this application will meet the requirements for a "Reclamation Plan" for operations 5 acres and larger in size and for a "Letter of Intent To Do Reclamation" for operations under 5 acres. If you do not intend to use the reclamation methods presented below, you must provide additional information concerning your plans for reclamation under separate attachments.

Total acreage currently disturbed: <1 acres. This should match: "Total Unreclaimed Acres" on your 2023 Annual Reclamation Statement for Small Mines, or line #7 on your 2024 Bond Pool Renewal Form. Disturbed ground includes all unreclaimed mining and exploration activity (excluding camps and roads) since October 1991. Federal operators must include areas of camps and roads.

New acres to be disturbed in 2024 0 acres. Total acreage (currently disturbed plus new acres): <1 acres.

Acreage disturbed by land status: _____ State (general) _____ State (Mental Health) _____ Private _____ Federal

Total acreage to be reclaimed in 2024 0 acres; Total volume of material to be disturbed in 2024: 0 cubic yards.

Include strippings and overburden to be removed. Cubic yards = Length (yards) x Width (yards) x Depth (yards).

Reclamation will be conducted concurrently with activity. Reclamation will be conducted at the end of the season.

THE FOLLOWING RECLAMATION MEASURES SHALL BE USED:


(These measures are required by law. Those that do not apply may be crossed out; but, an explanation must be given.)

- Topsoil, vegetation, and overburden muck, not promptly redistributed to an area being reclaimed, will be individually separated and stockpiled for future use. This material will be protected from erosion and from contamination by acidic or toxic materials and will not be buried by tailings.
- The area reclaimed will be reshaped to blend with the surrounding area using tailings, strippings, and overburden and be stabilized.
- Stockpiled topsoil, overburden muck, will be spread over the contoured exploration sites to promote natural plant growth such that the area can reasonably be expected to revegetate within five years. Stockpiled vegetation will be spread over topsoils.
- Exploration trenches will be backfilled. Brush piles, stumps, topsoil, and other organics will be spread on the backfilled surface to inhibit erosion and promote natural revegetation. All exploration trenches will be reclaimed by the end of the exploration season in which they are constructed, unless specifically approved by the DMLW (Mining operations are required by law to be reclaimed as contemporaneously as practicable with the mining operation to leave the site in stable condition).
- Shallow auger holes (limited to depth of overburden) will be backfilled with drill cuttings or other locally available material in such a manner that closes the hole to minimize the risk to humans, livestock and wildlife.
- All drill hole casings will be removed or cut off at, or below, ground level. All drill holes will be plugged by the end of the exploration season with bentonite holeplug or equivalent slurry, for a minimum of 10 feet within the top 20 feet of the drill hole. The remainder of the hole will be backfilled to the surface with drill cuttings. If water is encountered in any drill hole, a minimum of 7 feet of bentonite holeplug or equivalent slurry will be placed immediately above the static water level in the drill hole. (NOTE: The operator understands that complete filling of the drill holes, from bottom to top, with bentonite holeplug or equivalent slurry is also permitted and is considered to be the preferred method of hole closure, unless communicated otherwise by DMLW.)
- If artesian conditions are encountered, the operator will take all measures practicable to prevent the offsite discharge of those waters subject to 11 AAC 97.240 and will contact the DMLW for approval of hole plugging measures.
- At closure, all shafts, adits, tunnels, and air vents to underground workings will be stabilized and properly sealed to ensure protection of the public, wildlife and the environment.
- On state lands, all buildings and structures constructed, used, or improved will be removed, dismantled, or otherwise properly disposed of unless the surface owner or manager authorizes that the buildings and structures may stay.
- On state lands, all scrap iron, equipment, tools, piping, hardware, chemicals, fuels, waste, and general construction debris will be removed or properly disposed of.
- Reclamation measures taken will be consistent with any alternative post mining land use approved by the Commissioner, subject to the provisions of 11 AAC 97.300(h) and the conditions (if any) of an approved reclamation plan.

IMPORTANT: 1. Alternative reclamation measures may be approved if the reclamation measures presented above are not applicable to your site. Please explain in separate correspondence. Submit a sketch and describe additional reclamation measures you propose to conduct at your operation. Reclamation measures must comply with AS 27.19.

BONDING: In accordance with AS 27.19, bonding is required for all operations having a mined area of \geq five acres on State Land. This area must be bonded for \$750.00 per acre, unless the miner can demonstrate that a third party contractor can do the needed reclamation for less. The Statewide Bonding Pool may be joined by completing a bond pool application form and meeting certain requirements. No reclamation plan approval goes into effect until the bonding pool deposit and annual nonrefundable fees are paid. Use bond form to calculate area of disturbance for bonding.

BLM requires that a reclamation plan be consistent with 43 CFR 3809.420, Performance Standards for the Surface Management regulations for Federal Operations. Refer to 43 CFR 3809 or the BLM minerals website available at <https://www.blm.gov/programs/energy-and-minerals/mining-and-minerals> for more information on what is needed for a reclamation plan on Federal lands, as they may be different than those identified above.

| | | |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------|
| Printed name (Applicant) <u>Kristen Benchley</u>  Signature (Applicant) | Relationship to Mineral Property: <input checked="" type="checkbox"/> Owner <input type="checkbox"/> Lessee <input checked="" type="checkbox"/> Operator <input type="checkbox"/> Agent For: _____ | Date: <u>12/19/2025</u> APMA #: <u>9119</u> |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------|

2024 ANNUAL RECLAMATION STATEMENT

(33)

- Placer Mining
- Suction Dredging
- Hardrock Exploration

APMA # 9119

Complete and return this statement by December 31, 2024. If you did not operate, fill in your name, check bottom box, sign, and return form.

In accordance with AS 27.19 (Reclamation Act):

I, Kristen Benchley hereby file an annual reclamation statement for the 2024 mining operation described in subject Application for Permits to Mine in Alaska. (Submission of this statement does not constitute reclamation approval.)

Volume of material disturbed in 2024: 0 cubic yards (Includes stripping and processed material.)

Sluice days last season: _____ Cubic yards of material processed daily: _____ Annually: _____

Total acreage disturbed in 2024: State _____, Federal _____, Private _____. (Includes stripped areas, mining cuts, overburden and tailing stockpiles and disposal areas, temporary stream diversions, stream bypasses, and settling ponds.) Federal operators should include area of camp and access roads.

Length _____ feet and Width _____ feet of stream diversion.

Stream diversion: Temporary Permanent No Diversion (check one).

Total Area reclaimed in 2024: 0 acres.

Total un-reclaimed acres: <1 (This should match "total acreage currently disturbed" on the 2025 Reclamation Plan Form.)

For areas reclaimed, the following reclamation measures were used (check only measures that were used).

You must include photographs or videotapes of the completed reclamation work:

- Spread and contoured tailings
- Spread topsoil, vegetation, overburden muck or fines on the surface of contoured tailings
- Reestablished flood plain with stream channel in stable position
- Ponds are reclaimed
- Backfilled and reclaimed temporary stream diversions
- Camp removed, cleaned up and left free of debris
- Hardrock Exploration: Complete and submit an electronic Annual Reclamation Report

Other Reclamation Measures Taken:

Empty box for other reclamation measures.



Did not operate in 2024 and therefore did not conduct reclamation.

Relationship to Claim(s)

Owner Lessee Operator

Signed Kristen Benchley Date 12/19/2025

Agent For: _____

2025 RECLAMATION PLAN FORM (HARDROCK EXPLORATION)

| | | |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <input type="checkbox"/> A. RECLAMATION PLAN (REQUIRED if the operation will disturb five or more acres this year, OR 50,000 cubic yards, OR if the operation has a cumulative disturbed area of five or more acres). | <input type="checkbox"/> B. RECLAMATION PLAN VOLUNTARY (For an operation below limits shown in Box A but wanting to qualify for the statewide bonding pool. (Operations on BLM Lands and others not filing Letter of Intent). | <input checked="" type="checkbox"/> C. LETTER OF INTENT (34) (Less than five acres to be disturbed AND less than 50,000 cubic yards AND less than five acres unreclaimed area). |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

In accordance with Alaska Statute 27.19, reclamation is required of all mining operations. Reclamation bonding is required of operations with disturbance of 5 acres or greater. Completion of this application will meet the requirements for a "Reclamation Plan" for operations 5 acres and larger in size and for a "Letter of Intent To Do Reclamation" for operations under 5 acres. If you do not intend to use the reclamation methods presented below, you must provide additional information concerning your plans for reclamation under separate attachments.

Total acreage currently disturbed: <1 acres. This should match: "Total Unreclaimed Acres" on your 2024 Annual Reclamation Statement for Small Mines, or line #7 on your 2025 Bond Pool Renewal Form. Disturbed ground includes all unreclaimed mining and exploration activity (excluding camps and roads) since October 1991. Federal operators must include areas of camps and roads.

New acres to be disturbed in 2025 0 acres. Total acreage (currently disturbed plus new acres): <1 acres.

Acreage disturbed by land status: _____ State (general) _____ State (Mental Health) _____ Private _____ Federal

Total acreage to be reclaimed in 2025 0 acres; Total volume of material to be disturbed in 2025: 0 cubic yards.

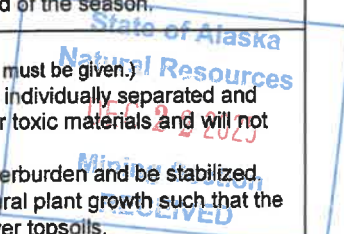
Include strippings and overburden to be removed. Cubic yards = Length (yards) x Width (yards) x Depth (yards).

Reclamation will be conducted concurrently with activity. Reclamation will be conducted at the end of the season.

THE FOLLOWING RECLAMATION MEASURES SHALL BE USED:

(These measures are required by law. Those that do not apply may be crossed out; but, an explanation must be given.)

- Topsoil, vegetation, and overburden muck, not promptly redistributed to an area being reclaimed, will be individually separated and stockpiled for future use. This material will be protected from erosion and from contamination by acidic or toxic materials and will not be buried by tailings.
- The area reclaimed will be reshaped to blend with the surrounding area using tailings, strippings, and overburden and be stabilized.
- Stockpiled topsoil, overburden muck, will be spread over the contoured exploration sites to promote natural plant growth such that the area can reasonably be expected to revegetate within five years. Stockpiled vegetation will be spread over topsoils.
- Exploration trenches will be backfilled. Brush piles, stumps, topsoil, and other organics will be spread on the backfilled surface to inhibit erosion and promote natural revegetation. All exploration trenches will be reclaimed by the end of the exploration season in which they are constructed, unless specifically approved by the DMLW (Mining operations are required by law to be reclaimed as contemporaneously as practicable with the mining operation to leave the site in stable condition).
- Shallow auger holes (limited to depth of overburden) will be backfilled with drill cuttings or other locally available material in such a manner that closes the hole to minimize the risk to humans, livestock and wildlife.
- All drill hole casings will be removed or cut off at, or below, ground level. All drill holes will be plugged by the end of the exploration season with bentonite holeplug or equivalent slurry, for a minimum of 10 feet within the top 20 feet of the drill hole. The remainder of the hole will be backfilled to the surface with drill cuttings. If water is encountered in any drill hole, a minimum of 7 feet of bentonite holeplug or equivalent slurry will be placed immediately above the static water level in the drill hole. (NOTE: The operator understands that complete filling of the drill holes, from bottom to top, with bentonite holeplug or equivalent slurry is also permitted and is considered to be the preferred method of hole closure, unless communicated otherwise by DMLW.)
- If artesian conditions are encountered, the operator will take all measures practicable to prevent the offsite discharge of those waters subject to 11 AAC 97.240 and will contact the DMLW for approval of hole plugging measures.
- At closure, all shafts, adits, tunnels, and air vents to underground workings will be stabilized and properly sealed to ensure protection of the public, wildlife and the environment.
- On state lands, all buildings and structures constructed, used, or improved will be removed, dismantled, or otherwise properly disposed of unless the surface owner or manager authorizes that the buildings and structures may stay.
- On state lands, all scrap iron, equipment, tools, piping, hardware, chemicals, fuels, waste, and general construction debris will be removed or properly disposed of.
- Reclamation measures taken will be consistent with any alternative post mining land use approved by the Commissioner, subject to the provisions of 11 AAC 97.300(h) and the conditions (if any) of an approved reclamation plan.



IMPORTANT: 1. Alternative reclamation measures may be approved if the reclamation measures presented above are not applicable to your site. Please explain in separate correspondence. Submit a sketch and describe additional reclamation measures you propose to conduct at your operation. Reclamation measures must comply with AS 27.19.

BONDING: In accordance with AS 27.19, bonding is required for all operations having a mined area of ≥ five acres on State Land. This area must be bonded for \$750.00 per acre, unless the miner can demonstrate that a third party contractor can do the needed reclamation for less. The Statewide Bonding Pool may be joined by completing a bond pool application form and meeting certain requirements. No reclamation plan approval goes into effect until the bonding pool deposit and annual nonrefundable fees are paid. Use bond form to calculate area of disturbance for bonding.

BLM requires that a reclamation plan be consistent with §43 CFR 3809.420, Performance Standards for the Surface Management regulations for Federal Operations. Refer to 43 CFR 3809 or the BLM minerals website available at <https://www.blm.gov/program/energy-and-minerals/mining-and-minerals> for more information on what is needed for a reclamation plan on Federal lands, as they may be different than those identified above.

| | | |
|--------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------|
| Printed name (Applicant) <u>Kristen Benchley</u> Signature (Applicant) | Relationship to Mineral Property: <input checked="" type="checkbox"/> Owner <input type="checkbox"/> Lessee <input checked="" type="checkbox"/> Operator <input type="checkbox"/> Agent For: _____ | Date: <u>12/19/2025</u> APMA #: <u>9119</u> |
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2025 ANNUAL RECLAMATION STATEMENT

(33)

- Placer Mining
- Suction Dredging
- Hardrock Exploration

APMA # 9119

Complete and return this statement by December 31, 2025. If you did not operate, fill in your name, check bottom box, sign, and return form.

In accordance with AS 27.19 (Reclamation Act):

I, Kristen Benchley hereby file an annual reclamation statement for the 2025 mining operation described in subject Application for Permits to Mine in Alaska. (Submission of this statement does not constitute reclamation approval.)

Volume of material disturbed in 2025: 0 cubic yards (Includes stripping and processed material.)

Sluice days last season: _____ Cubic yards of material processed daily: _____ Annually: _____

Total acreage disturbed in 2025 State _____, Federal _____, Private _____. (Includes stripped areas, mining cuts, overburden and tailing stockpiles and disposal areas, temporary stream diversions, stream bypasses, and settling ponds.) Federal operators should include area of camp and access roads.

Length _____ feet and Width _____ feet of stream diversion.

Stream diversion: Temporary Permanent No Diversion (check one).

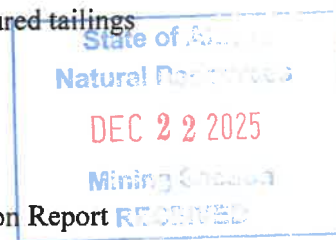
Total Area reclaimed in 2025: 0 acres.

Total un-reclaimed acres: <1 (This should match "total acreage currently disturbed" on the 2026 Reclamation Plan Form.)

For areas reclaimed, the following reclamation measures were used (check only measures that were used).

You must include photographs or videotapes of the completed reclamation work:

- Spread and contoured tailings
- Spread topsoil, vegetation, overburden muck or fines on the surface of contoured tailings
- Reestablished flood plain with stream channel in stable position
- Ponds are reclaimed
- Backfilled and reclaimed temporary stream diversions
- Camp removed, cleaned up and left free of debris
- Hardrock Exploration: Complete and submit an electronic Annual Reclamation Report



Other Reclamation Measures Taken:

Did not operate in 2025 and therefore did not conduct reclamation.

Relationship to Claim(s)

- Owner Lessee Operator
- Agent For: _____

Signed Kristen Benchley

Date 12/19/2025

2026 RECLAMATION PLAN FORM (HARDROCK EXPLORATION)

| | | |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <input type="checkbox"/> A. RECLAMATION PLAN (REQUIRED if the operation will disturb five or more acres this year, OR 50,000 cubic yards, OR if the operation has a cumulative disturbed area of five or more acres). | <input type="checkbox"/> B. RECLAMATION PLAN VOLUNTARY (For an operation below limits shown in Box A but wanting to qualify for the statewide bonding pool. (Operations on BLM Lands and others not filing Letter of Intent). | <input checked="" type="checkbox"/> C. LETTER OF INTENT (34) (Less than five acres to be disturbed AND less than 50,000 cubic yards AND less than five acres unreclaimed area). |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

In accordance with Alaska Statute 27.19, reclamation is required of all mining operations. Reclamation bonding is required of operations with disturbance of 5 acres or greater. Completion of this application will meet the requirements for a "Reclamation Plan" for operations 5 acres and larger in size and for a "Letter of Intent To Do Reclamation" for operations under 5 acres. If you do not intend to use the reclamation methods presented below, you must provide additional information concerning your plans for reclamation under separate attachments.

Total acreage currently disturbed: <1 acres. This should match: "Total Unreclaimed Acres" on your 2025 Annual Reclamation Statement for Small Mines, or line #7 on your 2026 Bond Pool Renewal Form. Disturbed ground includes all unreclaimed mining and exploration activity (excluding camps and roads) since October 1991. Federal operators must include areas of camps and roads.

New acres to be disturbed in 2026 0 acres. Total acreage (currently disturbed plus new acres): <1 acres.

Acreage disturbed by land status: _____ State (general) _____ State (Mental Health) _____ Private _____ Federal

Total acreage to be reclaimed in 2026 <1 acres; Total volume of material to be disturbed in 2026: 0 cubic yards.

Include strippings and overburden to be removed. Cubic yards = Length (yards) x Width (yards) x Depth (yards).

Reclamation will be conducted concurrently with activity. Reclamation will be conducted at the end of the season.

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| Printed name (Applicant) _____ Signature (Applicant) | Relationship to Mineral Property: <input checked="" type="checkbox"/> Owner <input type="checkbox"/> Lessee <input checked="" type="checkbox"/> Operator <input type="checkbox"/> Agent For: _____ | Date: <u>12/19/2025</u> APMA #: <u>9119</u> |
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