HD Mining International Ltd.

MURRAY RIVER COAL PROJECT

Decision Statement Annual Report – October 1, 2024 to September 30, 2025

Version: 1

December 18, 2025

DOCUMENT APPROVALS AND CONTROL

APPROVALS

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Jody Shimkus	Senior Advisor		
Jason Rempel	Environment and Sustainability Manager		19-Dec-2025

DOCUMENT CONTROL

Document Details:

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EXECUTIVE SUMMARY

The Murray River Coal Project (Project) is an underground metallurgical coal mine in northeast British Columbia (BC). The Proponent and Owner of the Project is HD Mining International Limited (HD Mining or Proponent). The Project is approximately 18 kilometres southwest of Tumbler Ridge and within Treaty 8.

The Project received an Environmental Assessment Decision Statement (DS) under the *Canadian Environmental Assessment Act, 2012*, on December 13, 2017, and an Environmental Assessment Certificate #M15-03 (EAC) under the BC *Environmental Assessment Act* (2002) on October 1, 2015. An amended DS was issued by the Minister of the Environment on July 26, 2024.

An annual report is required by the conditions included in the DS. This report covers the period from October 1, 2024 to September 30, 2025. The report summarizes the activities undertaken by the Proponent in the reporting year to comply with each condition and sets out the results of the follow-up program requirements in DS conditions:

- Condition 3.8: Fish and Fish Habitat Follow-up Program;
- Conditions 3.10 and 3.11: Metal Leaching/Acid Rock Drainage and Selenium Follow-up Program;
- Condition 3.12: Subsidence Follow-up Program;
- Condition 4.4: Migratory Birds Follow-up Program;
- Condition 6.3: Health of Indigenous Peoples Follow-up Program and Communication Plan;
- Condition 7.11: Current Use of Lands and Resources for Traditional Purposes Follow-up Program; and
- Condition 7.14: Caribou Follow-up Program.

Construction of the mine started in June 2024. In May 2025, due to political and economic uncertainty in Canada and globally, HD Mining made the decision to pause construction activities and return the site to care and maintenance effective July 18, 2025.

Construction activities undertaken during the reporting period included:

- continued rehabilitation of the service decline,
- initial dewatering of the service decline;
- continued construction of a new hoist house and monorail system;
- tree clearing of 3 hectares (ha) at the decline site and 2 ha at the shaft site;
- salvage of soils from newly cleared areas; and
- placement of soils at the decline site for long-term storage.

SOMMAIRE

Le Projet de mine de charbon Murray River (le Projet) est une mine de charbon métallurgique souterraine située dans le nord-est de la Colombie-Britannique (C.-B.). Le promoteur et propriétaire du projet est HD Mining International Limited (HD Mining ou le Promoteur). Le Projet est situé à environ 18 kilomètres au sud-ouest de Tumbler Ridge, dans le territoire visé par le Traité n° 8.

Le Projet a fait l'objet d'un énoncé de décision d'évaluation environnementale en vertu de la *Loi canadienne sur l'évaluation environnementale de 2012*, le 13 décembre 2017, et d'un certificat d'évaluation environnementale #M15-03 (CEE) en vertu de la *Loi sur l'évaluation environnementale de la Colombie-Britannique* (2002), le 1er octobre 2015. Le ministre de l'Environnement a publié une déclaration de décision modifiée le 26 juillet 2024.

Un rapport annuel est exigé par les conditions incluses dans la déclaration de décision. Le rapport couvre la période du 1er octobre 2024 au 30 septembre 2025. Le rapport résume les activités entreprises par le Promoteur au cours de l'année de référence en conformité avec les conditions et présente les résultats des exigences du programme de suivi dans les conditions de la déclaration de décision :

- Condition 3.8 : Programme de suivi relativement au poisson et à l'habitat du poisson;
- Conditions 3.10 et 3.11 : Programme de suivi de la lixiviation des métaux/drainage rocheux acide et du sélénium;
- Condition 3.12 : Programme de suivi de l'affaissement du sol;
- Condition 4.4 : Programme de suivi des oiseaux migrateurs;
- Condition 6.3 : Programme de suivi et plan de communication sur la santé des peuples autochtones;
- Condition 7.11 : Programme de suivi de l'utilisation actuelle des terres et des ressources à des fins traditionnelles;
- Condition 7.14 : Programme de suivi du caribou.

La construction de la mine a débuté en juin 2024. En mai 2025, en raison de l'incertitude politique et économique au Canada et dans le monde, HD Mining a pris la décision de suspendre les activités de construction et de remettre le site en état de surveillance et d'entretien à partir du 18 juillet 2025.

Les activités de construction entreprises au cours de la période considérée incluaient :

- la poursuite de la réhabilitation de la rampe de descente;
- l'assèchement initial de la rampe de descente;

- la poursuite de la construction d'un nouveau bâtiment de treuil et d'un système de monorail;
- le déboisement de 3 ha dans la zone de la descente et de 2 ha dans la zone du puits;
- la récupération des sols provenant de zones nouvellement défrichées;
- le placement des sols dans la zone de la rampe de descente pour un stockage à long terme.

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1 INTRODUCTION

The Murray River Coal Project (Project) is an underground metallurgical coal mine in northeast British Columbia (BC). The Proponent and Owner of the Project is HD Mining International Limited (HD Mining or Proponent). The Project is approximately 18 km southwest of Tumbler Ridge and falls within Treaty 8 (Figure 1-1).

HD Mining received an Environmental Assessment Decision Statement (DS) (Government of Canada 2017) under the *Canadian Environmental Assessment Act* (Government of Canada 2012) on December 13, 2017, and an Environmental Assessment Certificate #M15-03 (EAC) (BC Ministry of Environment 2015) under the BC *Environmental Assessment Act* (Government of British Columbia 2018) on October 1, 2015. An amended DS was signed by the Minister of the Environment on July 26, 2024.

Advanced exploration activities were conducted at the site from March 2012 to early 2016, including surface development of infrastructure at the decline site and the shaft site and underground development of a decline 1,300 m down to the D coal seam. After a bulk sample of coal was collected in 2015/2016, the site was placed into care and maintenance until mine construction was initiated in June 2024.

Construction activities were on-going through the remainder of 2024 and the first half of 2025. In May 2025, due to political and economic uncertainty in Canada and globally, HD Mining made the decision to pause construction, and the mine returned to care and maintenance effective July 18, 2025.

When construction resumes, a 5-year construction phase is planned, after which the mine will operate for 25 years, producing approximately 4.5 million tonnes of metallurgical coal product, and 6 million tonnes of run-of-mine (ROM) coal annually. The closure phase is approximately 3 years, and HD Mining has planned for a 6-year post-closure monitoring program.

The *Decision Statement Annual Report – October 1, 2024 to September 30, 2025* (Annual Report 2024-2025) fulfills DS Conditions 2.8 and 2.9, which require the preparation and submission of an annual report on the implementation of DS conditions.

> *2.8 The Proponent shall, commencing in the reporting year during which the Proponent begins the implementation of the conditions set out in this Decision Statement, prepare an annual report that sets out:*

2.8.1 the activities undertaken by the Proponent in the reporting year to comply with each of the conditions set out in this Decision Statement;

2.8.2 how the Proponent complied with condition 2.1;

2.8.3 for conditions set out in this Decision Statement for which consultation is a requirement, how the Proponent considered any views and information that the Proponent received during, or as a result of, the consultation;

2.8.4 the information referred to in conditions 2.4 and 2.5 for each follow-up program;

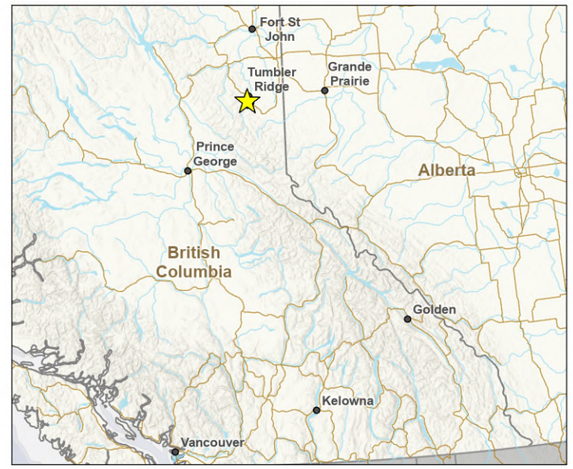
2.8.5 the results of the follow-up program requirements identified in conditions 3.8, 3.10, 3.11, 3.12, 4.4, 5.3, 6.3, 7.11, and 7.14; and

2.8.6 any modified or additional mitigation measures implemented or proposed to be implemented by the Proponent, as determined under condition 2.6.

2.9 The Proponent shall submit to the Agency the annual report referred to in condition 2.8, including an executive summary in both official languages, no later than December 31 following the reporting year to which the annual report applies.

The reporting period for the report is October 1, 2024 to September 30, 2025.

Murray River Coal Project
Surface Infrastructure



0 500 1,000 1,500 2,000
Metres

Map Scale = 1:65,000 (printed on 11 x 17)
Map Projection: NAD 1983 UTM Zone 10N

N

- Highway
- Road
- Permitted Mine Area (2023)

Surface Infrastructure - Existing
- Decline Site
- Shaft Site

Surface Infrastructure - Permitted, Not Yet Constructed
- Coarse Coal Rejects and Coal Processing Site
- Power Line Infrastructure
- Secondary Shaft Site

Data Sources

- Permitted Mine Area (2023). HD Mining. 2023.
- Surface Infrastructure. HD Mining. 2025.
- Watercourse, Waterbody. Canvec 1:50,000. Government of Canada. 2025.
- Primary Road, Secondary Road, Rail. Digital Road Atlas. Government of British Columbia. 2025.
- Basemap. World Hillshade. Esri, USGS, Earthstar Geographics

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EDI Environmental Dynamics Inc. has made every effort to verify this map is free of errors. Data has been derived from a variety of digital sources and, as such, EDI does not warrant the accuracy, completeness, or reliability of this map or its data.

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Date: 12/19/2025

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Figure 1-1

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1.1 PROJECT ACTIVITIES

Project activities during the reporting period included continued rehabilitation of the decline, including initial dewatering; tree clearing; and placement of soils for long-term storage. Table 1-1 provides an overview of Project activities during the reporting period, with example photos provided in Appendix A.

Table 1-1. Project Construction-related Activities during the Reporting Period

Activity/Component	Description
October 1, 2024 to July 17, 2025	

Decline Site	• Continued underground development and maintenance of decline access
	  ○ Re-enter underground, assess conditions and rehabilitate workings
	  ○ Initiate dewatering of service decline (March through May 2025)
	• Continued construction of new hoist house and monorail system
	• Tree clearing of ~3 hectares (ha) area in March 2025, following receipt of Occupant Licence to Cut (OLTC). Environmental protection measures implemented (erosion and sediment control, buffer marking)
	• Salvage and stockpile of soils from newly cleared areas
	• Relocation of temporarily stockpiled soils to long-term location
	• Ongoing environmental monitoring and mitigation consistent with permit requirements and management plans

Shaft Site	• Tree clearing of ~2 ha area in March 2025, following receipt of OLTC. Environmental protection measures implemented (erosion and sediment control, buffer marking) • Continued care and maintenance of existing infrastructure
Coal Processing Site	• No construction activity • Environmental monitoring consistent with permit requirements and management plans
Secondary Shaft Site	• No activity
July 18, 2025 to September 30, 2025	
Care and Maintenance	• Ongoing care and maintenance at the decline site and shaft site • Environmental monitoring consistent with permit requirements and management plans

1.2 ANNUAL REPORT SCOPE AND ORGANIZATION

This report has been developed to comply with Condition 2.8 of the DS. The report is organized as follows: follow-up programs (Section 3), communication plans and related pre-construction requirements (Section 4), management plans (Section 5), and other conditions (Section 6). Monitoring and field surveys were implemented during the reporting period, including monitoring or surveys for air quality, water quality, aquatics, fish and fish habitat, caribou, and migratory birds. These activities are described in Sections 3 to 6. No environmental change occurred that required HD Mining to modify or add mitigation measures.

2 ENGAGEMENT AND CONSULTATION (CONDITIONS 2.2 AND 2.3)

Conditions 2.2 and 2.3 identify consultation requirements where a DS condition requires consultation with Indigenous groups (IGs) and/or federal agencies. Pursuant to Section 1.18 of the DS:

> *"Indigenous groups means the following Aboriginal peoples: West Moberly First Nations, Saulteau First Nations, McLeod Lake Indian Band, Blueberry River First Nations, Horse Lake First Nation, Doig River First Nation (DRFN), Fort Nelson First Nation, Halfway River First Nation, Prophet River First Nations, Sucker Creek First Nation, Kelly Lake Métis Settlement Society, and Métis Nation British Columbia".*

During the 2024-2025 reporting period, HD Mining continued engagement and consultation with IGs and relevant authorities as per Conditions 2.2 and 2.3. Table 2-1 summarizes the consultation and engagement that has been undertaken with IGs and relevant authorities during the reporting period.

Comments received by HD Mining were considered and reviewed by Qualified Individuals (QIs) with the education, experience, and knowledge relevant to a particular matter. HD Mining responded to comments in comment-response tracking tables, which were shared with the commentor. HD Mining also invited additional input from the IGs on the implementation of the Current Use of Lands and Resources for Traditional Purposes Follow-up Plan (CUFUP), resulting in further discussions with three of the groups (Table 2-1).

Table 2-1. Summary of Consultation and Engagement with Indigenous Groups and Relevant Authorities During the Reporting Period

Condition	Action	Status on September 30, 2025
2.7	Analysis of follow-up results with Indigenous groups (IGs)[1]	• Analysis of follow-up results with IGs was postponed when the Project entered a phase of care and maintenance in July 2025
2.9, 2.10	Decision Statement Annual Report – October 1, 2023 to September 30, 2024 (Annual Report 2023-2024)	• Distributed Annual Report 2023-2024 to the IGs and to the Impact Assessment Agency of Canada (IAAC) on December 23, 2024 • Notified IGs, IAAC, and relevant authorities that the Annual Report 2023-2024 was available on the HD website in March 2025
3.8 (including 3.2 to 3.5)	Fish and Fish Habitat Follow-up Program	• On October 16, 2024, emailed the First Nations Independent Technical Review (FNITR)[2] and offered to meet and discuss responses to comments sent in September 2024; FNITR acknowledged the invitation on October 17, 2024 • On November 18, 2024, emailed a follow-up to the FNITR regarding status of review, and offer to meet; FNITR indicated a meeting was not required • Follow-up table of comments received from FNITR on December 4, 2024, indicating no further comments for this follow-up program.
3.9 to 3.11	Metal Leaching/Acid Rock Drainage and Selenium Follow-up Program	• On October 16, 2024, emailed FNITR and offered to meet and discuss responses to comments sent in September 2024; FNITR acknowledged the invitation on October 17, 2024 • On November 18, 2024, emailed a follow-up to the FNITR regarding status of review, and offer to meet; FNITR indicated a meeting was not required • Comments received from Environment and Climate Change Canada (ECCC) on November 14, 2024 • Comment table received from FNITR on December 4, 2024, indicating no further comments for this follow-up plan • Documented and emailed written responses to ECCC on February 6, 2025

[1] *In this table, and throughout the document, Indigenous groups refer to all 12 groups listed in the DS Definition 1.18.*

[2] *FNITR represents Saulteau First Nations and West Moberly First Nations.*

Condition	Action	Status on September 30, 2025
		• ECCC requested an updated version of the follow-up program on February 11, 2025 • Responded to ECCC on February 20, 2025 that the version of the follow-up program provided on August 17, 2024 was the most up to date version, and that ECCC's most recent responses did not result in any changes to the follow-up program • ECCC requested comments from other parties on the follow-up program on March 20, 2025 • Provided the comment responses from FNITR on the follow-up program to ECCC on March 26, 2025 • Comments received from ECCC on May 22, 2025 • Project entered care and maintenance in July 2025 • Follow-up program will be updated prior to re-commencing construction
3.12	Subsidence Follow-up Program	• On October 16, 2024, emailed FNITR and offered to meet and discuss responses to comments sent in September 2024; FNITR acknowledged the invitation on October 17, 2024 • On November 18, 2024, emailed a follow-up to the FNITR regarding status of review and offer to meet; FNITR indicated a meeting was not required • Comments received from ECCC on November 14, 2024 • Comment received from FNITR on December 4, 2024 • Documented and emailed written responses to ECCC on January 15, 2025 • Documented and emailed written response to FNITR on January 16, 2025 • Comments received from ECCC on May 22, 2025 • Project entered care and maintenance in July 2025 • Follow-up program will be updated prior to re-commencing construction
4.1, 4.2, 4.4	Migratory Bird Follow-up Program	• Comment received from ECCC on December 2, 2024 • Documented and emailed a written response to ECCC on January 15, 2025; ECCC responded indicating their comments were resolved

Condition	Action	Status on September 30, 2025
6.3	Health of Indigenous Peoples Follow-up Program	• Project entered care and maintenance in July 2025 • No comments were received from IGs or regulators during the 2024-2025 reporting period • HD Mining continues to maintain air quality monitoring and surface water quality monitoring that informs the follow-up program
6.5	Health of Indigenous Peoples Communication Plan	• ECCC and Fisheries and Oceans Canada acknowledged receipt of the communication plan on October 1 and October 8, 2024 respectively • No comments were received from IGs or regulators during the 2024-2025 reporting period • No potential health risks, updates to the human health risk assessment or mitigation measures, or development of site performance objectives requiring communications with IGs and relevant authorities occurred during the 2024-2025 reporting period
7.1, 7.3	Noise Communication Plan	• No comments were received from IGs or regulators during the 2024-2025 reporting period • No noise complaints or elevated noise requiring communications with IGs occurred during the 2024-2025 reporting period
7.7, 7.8, 7.12, 7.13, 7.14, 7.15	Caribou Follow-up Program	• Comments received from ECCC on October 16, 2024 • Documented and emailed responses to ECCC comments on March 14, 2025 • Comments received from ECCC on August 12, 2025 • Project entered care and maintenance in July 2025 • The follow-up program will be updated prior to re-commencing construction
7.11	Current Use of Lands and Resources for Traditional Purposes Follow-up Program	• On December 19, 2024, HD Mining emailed the IGs material related to the content of the follow-up program, including a PowerPoint presentation, and requested the opportunity to discuss • HD Mining followed up with IGs on February 7, 2025 • HD Mining met with Halfway River First Nation to discuss the follow-up program on February 12, 2025 • HD Mining met with McLeod Lake Indian Band to discuss the follow-up program on February 19, 2025

Condition	Action	Status on September 30, 2025
		• Sucker Creek First Nation provided input regarding the implementation of the follow-up program on March 13, 2025 • The engagement activities focused on implementation and did not result in any comments in the comment tracking tables or edits to the follow-up program
8.1 to 8.3	Heritage Management Plan	• Additional engagement did not occur during the 2024-2025 reporting period, noting the Project entered care and maintenance in July 2025
10.1 to 10.4	Accidents and Malfunctions Memo	• Additional engagement did not occur during the 2024-2025 reporting period, noting the Project entered care and maintenance in July 2025
10.5	Accidents and Malfunctions Communications Plan	• Additional engagement did not occur during the 2024-2025 reporting period, noting the Project entered care and maintenance in July 2025 • No accidents or malfunctions requiring communications with IGs, IAAC, or relevant authorities occurred during the 2024-2025 reporting period
7.16, 11.1	Implementation Schedule	• An updated implementation schedule was distributed to the IGs and to IAAC on August 5, 2025, reflecting the Project's move to a care and maintenance, and it was posted to HD Mining's website

3 FOLLOW-UP PROGRAMS

Pursuant to Condition 2.1, HD Mining engaged QIs to develop and support implementation of the follow-up programs to address the requirements identified in the DS.

3.1 FISH AND FISH HABITAT FOLLOW-UP PROGRAM (CONDITIONS 3.1 – 3.5, 3.8)

The Fish and Fish Habitat Follow-up Program (FFHFUP; Condition 3.8) is required to:

- determine the effectiveness of the rock weirs referred to in Condition 3.2 to protect fish and fish habitat; and
- determine the effectiveness of the fish habitat protection measures identified under Conditions 3.3, 3.4, and 3.5.

The FFHFUP outlines the methods and details associated with monitoring, the levels of environmental change predicted in the Environmental Assessment Certificate Application / Environmental Impact Statement (EAC Application/EIS) for the Project (HD Mining International Ltd. 2014), and the mitigation measures that are to be implemented.

The following activities were undertaken during the reporting period:

- Winter Environmental DNA (eDNA) sampling of potential rock weir locations within M20 Creek to determine the fish species that are overwintering in these locations prior to weir installation.

Construction activities near riparian areas did not occur during the reporting period, and therefore fish and fish habitat protection measures are yet to be implemented (Conditions 3.1, 3.3, 3.4, and 3.5). No rock weirs were installed during the reporting period (Condition 3.2).

3.1.1 PRE-CONSTRUCTION ROCK WEIR ASSESSMENT (CONDITION 3.2)

Environmental DNA was collected through the ice on March 25, 2025, at three transect locations for the proposed weir as well as the existing water quality site M20-04 (Figure 31). The eDNA samples were collected using Aquatic Environmental DNA Kits provided

by Jonah Ventures and sent to their commercial lab in Boulder, Colorado USA for analysis. The kits included a 60 mL syringe to draw water from the sampling location and push it through an enclosed 25 mm diameter filter with a 1.0 µm pore size. Water was pushed through the filters until they clogged. The volume of water filtered at each site varied depending on the concentration of suspended solids that clogged the filter. Filters were preserved with Triton X-100 ™. A negative control sample (or field blank) of de-ionized water was also processed using the same method as the eDNA samples to provide a quality control measure that would indicate potential DNA contamination in the field.

Samples were collected through the ice by drilling holes with a hand auger until flowing water was found. The crew then cleared any slush and debris from the hole and waited for any turbid water to clear prior to collecting the sample (particularly if the auger struck bottom). Samples were collected in well-mixed areas and in a manner that avoided contamination.

eDNA extracted from filters was amplified in a Polymerase Chain Reaction (PCR) using the MiFish-U metabarcoding primer set (Miya et al. 2015), and sequenced. The raw sequencing data were processed through a bioinformatics pipeline and compared against a reference sequence database to assign a consensus taxonomy (i.e., fish species) to each Exact Sequence Variant (ESV). Unique DNA sequences from environmental samples are matched to a reference database to determine the most likely species detected.

The level of detection certainty for a particular ESV can be evaluated based on the eDNA read count in a sample and the number of samples that an ESV was detected in. Read counts were summed between all ESVs that were assigned to the same taxon in a single sample. Detection levels in an individual sample were then grouped into four subjectively assigned categories that represented four orders of magnitude. Less than 100 reads were considered a "weak" detection. Read counts between 100 and 999 were considered "good". Read counts between 1,000 and 9,999 were considered a "strong" detection and read counts greater than 10,000 were considered "very strong" detections. Detection certainty also rose with the number of samples in which an ESV was found.

Sculpin (*Cottus* sp.) were detected strongly in every sample from M20 Creek (Table 3-1). Bull trout (*Salvelinus confluentus*) were also detected in every sample with good read counts in three of four samples and a weak detection at Transect 2. Mountain whitefish (*Prosopium williamsoni*) were only weakly detected at Transect 1 and 2 and M20-04 but were not detected at Transect 3.

Table 3-1. eDNA read counts from M20 Creek.

Taxon	M20-04	Transect 1	Transect 2	Transect 3
Sculpin (general)[1]	3,765	3,567	1,319	1,731
Mountain Whitefish	24	14	82	0
Bull Trout	930	191	91	544

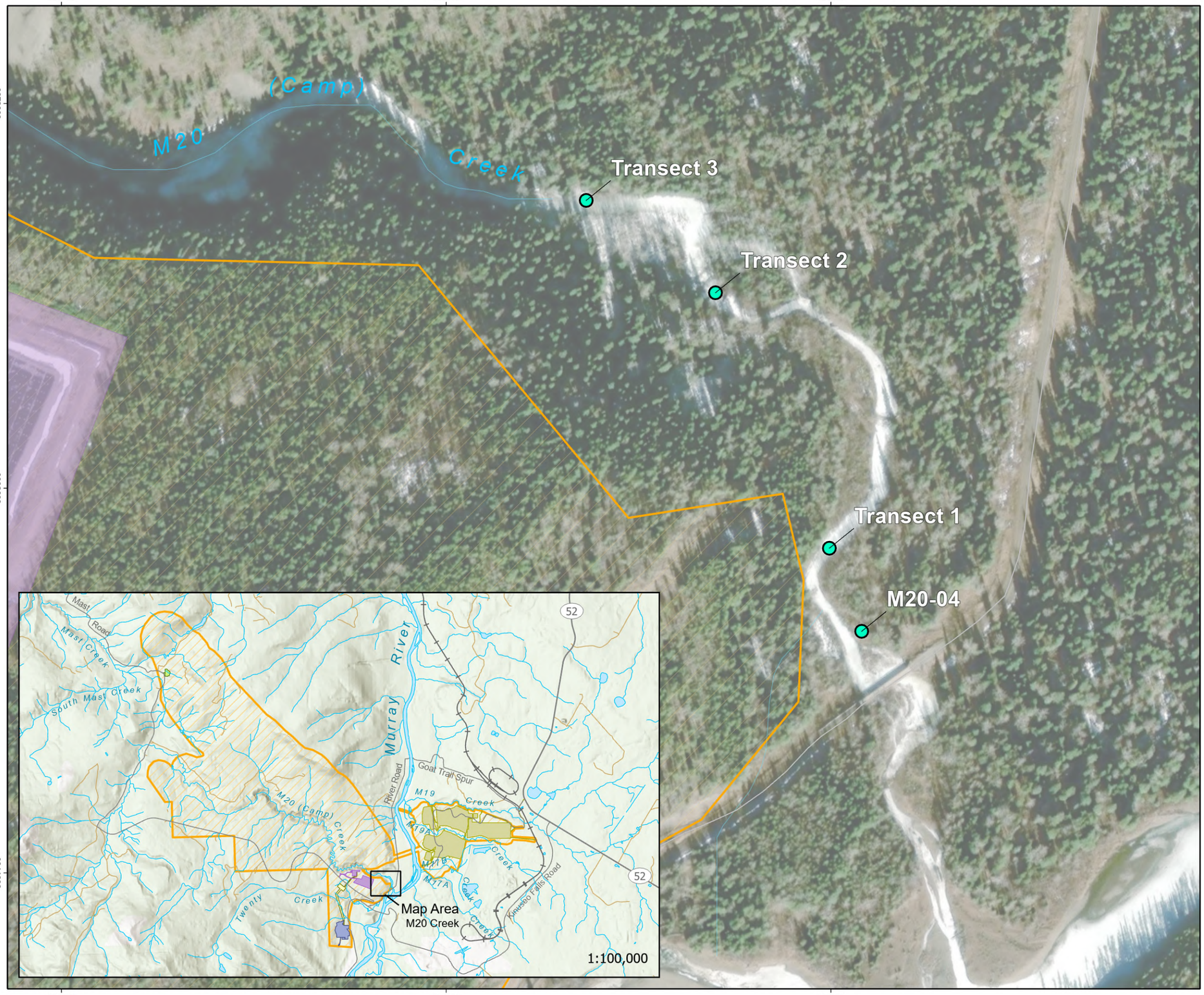
[1] *Sequences that were only resolved to genus level.*

Note: The absolute number of DNA sequence reads for each taxon (species, genus, or family) is noted along with a fill colour that represents the relative strength of detection.

Detection strength:	*<100 reads: Weak*	*100-999 reads: Good*	*1,000-9,999: Strong*	*>10,000: Very Strong*

Results from eDNA sampling indicate sculpin and bull trout were likely present and it is highly probable that these species use the lower portion of M20 Creek for overwintering; mountain whitefish presence is uncertain and may be limited or intermittent. Weir design will need to incorporate overwintering habitat preferences for these species. For example, sculpin rely on substrate refugia (e.g., interstitial spaces between cobbles and well oxygenated flow through substrate) (McPhail 2007) and bull trout have a preference for deep pools and low-velocity areas (McPhail and Baxter 1996).

2025 M20 Creek eDNA Sampling



0 25 50 75 100
Metres

Map Scale = 1:2,500 (printed on 11 x 17)
Map Projection: NAD 1983 CSRS UTM Zone 10N

N

- eDNA Sampling Sites
- Watercourse
- Waterbody
- Permitted Mine Area (2023)

Surface Infrastructure - Existing
- Decline Site
- Shaft Site

Surface Infrastructure - Permitted, Not Yet Constructed
- Coarse Coal Rejects and Coal Processing Site
- Power Line Infrastructure
- Secondary Shaft Site

Data Sources

- Permitted Mine Area (2023). HD Mining. 2023.
- Surface Infrastructure. HD Mining. 2021.
- eDNA sampling sites. EDI. 2025.
- Watercourse, Waterbody. Canvec 1:50,000. Government of Canada. 2025.
- Forest Service Road. Government of Canada. 2025.
- Primary Road, Secondary Road, Rail. Digital Road Atlas. Government of British Columbia. 2025.
- Basemap. World Hillshade. Esri, USGS, Source: Esri, Vantor, Earthstar Geographics, and the GIS User Community, Esri, NASA, NGA, USGS, FEMA

Disclaimer

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Figure 3-1

hd Mining

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3.2 METAL LEACHING/ACID ROCK DRAINAGE AND SELENIUM FOLLOW-UP PROGRAM (CONDITIONS 3.9 – 3.11)

The Metal Leaching /Acid Rock Drainage and Selenium Follow-up Program (ML/ARD and Se FUP) is required by:

- Condition 3.10: Requires a follow-up program to verify the accuracy of the environmental assessment as it pertains to water quality due to the presence, within the Designated Project Area, of reactive geologic material referred to in Condition 3.9 and predicted adverse environmental effects on fish and fish habitat; and
- Condition 3.11: Requires a follow-up program to verify the accuracy of the environmental assessment as it pertains to the adverse environmental effects of selenium releases on fish, and to determine the effectiveness of mitigation measures referred to in Condition 3.6.

The ML/ARD and Se FUP outlines the methodology, location, frequency, timing and duration of monitoring and related reporting.

The following activities were undertaken during the reporting period:

- Continued geochemical characterization via field leach barrels and humidity cells (Conditions 3.9 and 3.11.1);
- Water quality monitoring of contact water and receiving waters (Conditions 3.10 and 3.11.2); and
- Monitoring of selenium concentrations in sediment, benthic invertebrates and slimy sculpin (Condition 3.11.2).

Engagement with Environment and Climate Change Canada (ECCC) on the ML/ARD and Se FUP continued during construction. The Project entered care and maintenance in July 2025; the follow-up program will be updated prior to re-commencing construction.

3.2.1 GEOCHEMICAL CHARACTERIZATION OF GEOLOGIC MATERIALS (CONDITION 3.9)

A summary of the baseline geochemical characterization of waste rock, raw and processed coal, coarse coal rejects (CCR), and tailings is provided in Section 2.1.1 of the ML/ARD and Se FUP. No new rock was exposed during the reporting period, and therefore, the geochemical characterization via static testing remains unchanged.

Results from on-going kinetic testing via field leach barrel and laboratory humidity cells are described below.

Long-term ML/ARD and Selenium Leaching Risk Assessment

To assess the long-term ML/ARD chemistry (Condition 3.10), and selenium leaching potential (Condition 3.11.1), kinetic testing programs have been underway since 2010, using representative samples of mined materials. Thirty-one humidity cell tests (HCTs) were established between 2011 and 2016 using samples of coal, waste rock, parting, and tailings. Twenty-eight of the HCTs, where leach rates and pH had stabilized, have since been terminated, while three HCTs are still running until they approach stabilization. Four Field Leach Barrels (FLBs) containing waste rock have been in operation since 2011, and three FLBs containing tailings, CCR, and CCR + tailings mix have been in operation since 2016.

The kinetic testing program is evaluated in January every year and the results are documented in the Annual Reclamation Report pursuant to BC *Mines Act* Permit #C-244 (BC Ministry of Energy Mines and Petroleum Resources 2018).

The results of the most recent evaluation of the kinetic testing program (calendar year 2024) are illustrated in Figure 3-2 and Figure 3-3 and summarized as follows:

- HC-11 (Hulcross formation, potentially acid generating [PAG]): 715 weeks of operation. Currently acid generating, but relatively stable. Metals have shown a stabilization in concentrations in line with stabilizing pH. Cd, Co, and Zn remain well above Mine Permit and/or BCFAL guidelines.
- HC-2 (coal): 722 weeks of operation. PAG sample. pH slightly declining but remains circumneutral; H+ release slightly increasing. Metal/metalloid release all below Mine Permit and BCFAL guidelines and stable.
- HC-31 (coal reject + tailings): 453 weeks of operation. PAG sample. Sulphate approaching stability. pH circumneutral and H+ release stable. Metal/metalloid release all below Mine Permit and BCFAL guidelines and stable.

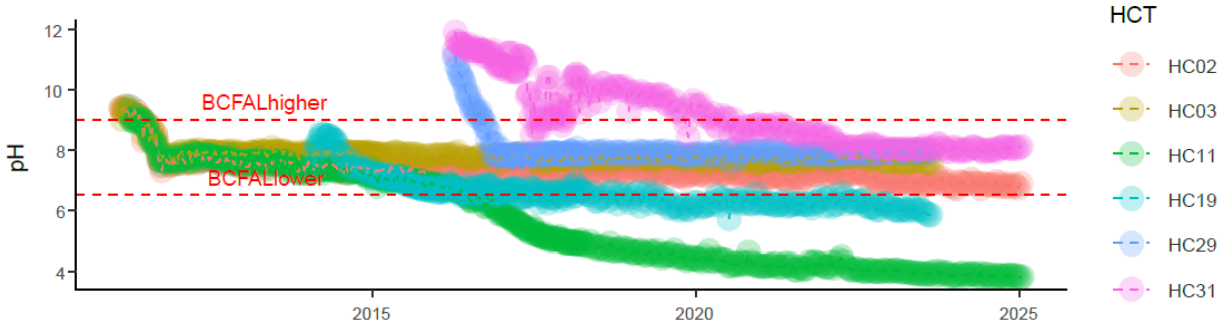


Figure 3-2. Temporal Trends of pH in Murray River Humidity Cell Tests.

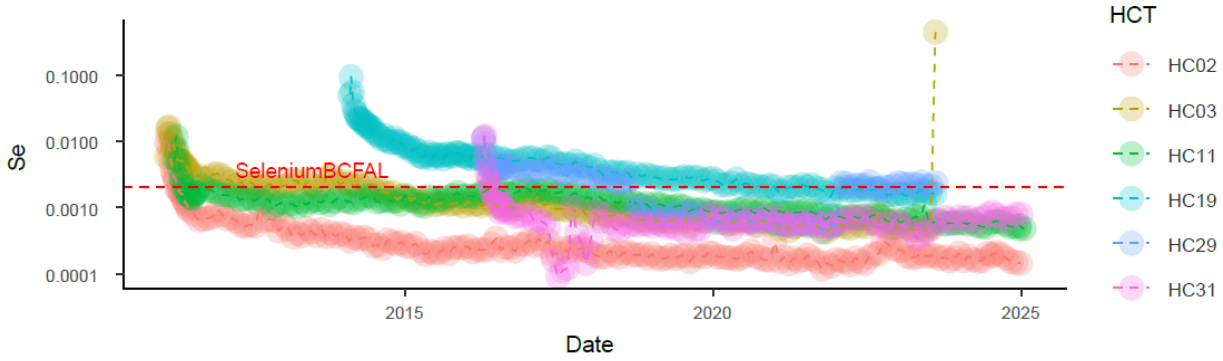


Figure 3-3. Temporal Trends of Selenium in Murray River Humidity Cell Tests (log scale).

With respect to the FLBs, two of the seven FLBs are classified as PAG material (Hasler and Hulcross formations) and their leachate shows continued declining pH (Figure 3-4), as well as increasing cadmium and zinc concentrations (above BCFAL limit) and increasing aluminum, copper, cobalt. The FLBs classified as not potentially acid generating (NPAG) (3 samples) have circumneutral pH and relatively stable metal concentrations. Selenium is elevated above the BCFAL criteria (Figure 3-5) for six of the seven FLBs. All FLBs continue to run to collect additional information on the risk of ML under site climatic conditions.

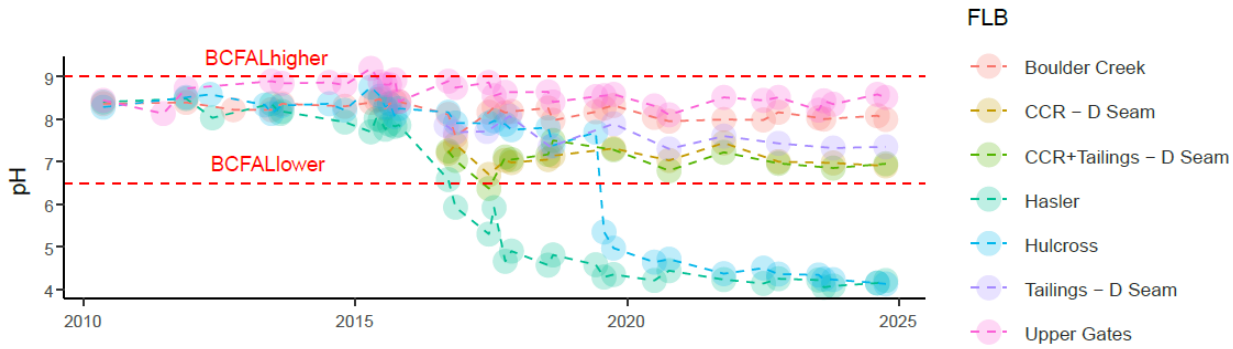


Figure 3-4. Temporal Trends of pH in Murray River Field Leach Barrels.

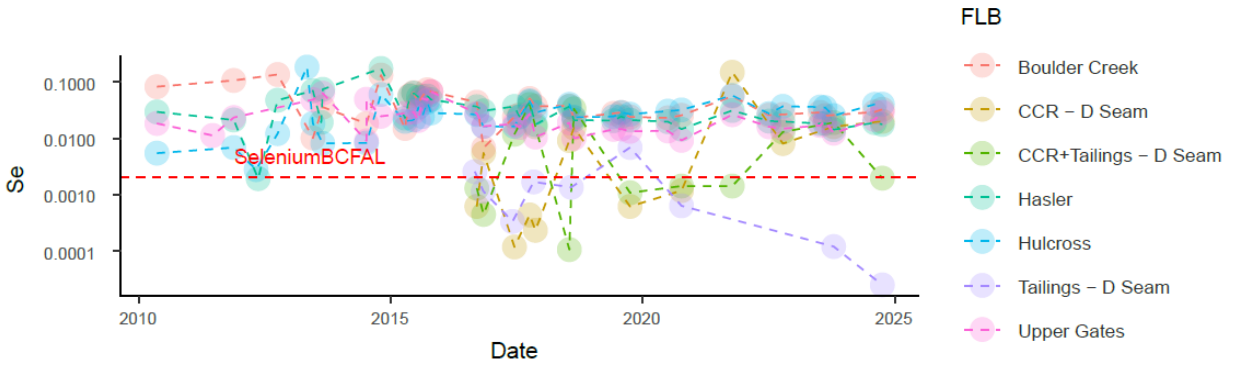


Figure 3-5. Temporal Trends of Selenium (mg/L) in Murray River Field Leach Barrels (log scale).

The results of the kinetic testing programs (humidity cells and FLBs) were used to update the geochemical source terms, which, in turn, feed into the water quality prediction model (consistent with DS Condition 3.9). As per *EMA* Permit #106666, Section 4, water quality predictions (model) are required to be updated at least 60 days prior to the start of construction, and every 5 years thereafter. The latest model update was completed and submitted to the BC Ministry of Environment and Climate Change Strategy in March 2024, with a subsequent update in November 2024. The latest base case model results indicate that with the planned mitigation measures water quality predictions in the receiving environment will remain below chronic BCFAL guidelines or background concentrations for all project nodes and all project phases.

3.2.2 CONTACT WATER AND RECEIVING WATER MONITORING (CONDITION 3.10)

Contact water and receiving water sites (Figure 3-6) are monitored monthly for field parameters, conventional parameters, major ions, nutrients, and total and dissolved metals. The contact water sites are also monitored for extractable petroleum hydrocarbons.

During the reporting period, there were 23 days with discharge from the shaft site pond; these occurred in October 2024, May 2025, and September 2025. There were 13 days with discharge from the decline site pond which occurred between March 31 and May 26 in 2025. The shaft site pond was discharged in October as part of an initial dilution zone study, and in May and September to lower the pond level from spring run off and fall rains. The decline site pond discharges were to maintain freeboard in the pond while pumping water from underground into the primary pond. This was the first discharge from the decline site pond since the riser was removed in December 2017.

All discharges adhered to the allowable volume and characteristics of discharge per site set out in *Environmental Management Act* (*EMA)* Permit #106666 (Table 3-2 and Table 3-3). In the reporting period, no treatment was required for contact water to meet the discharge guidelines.

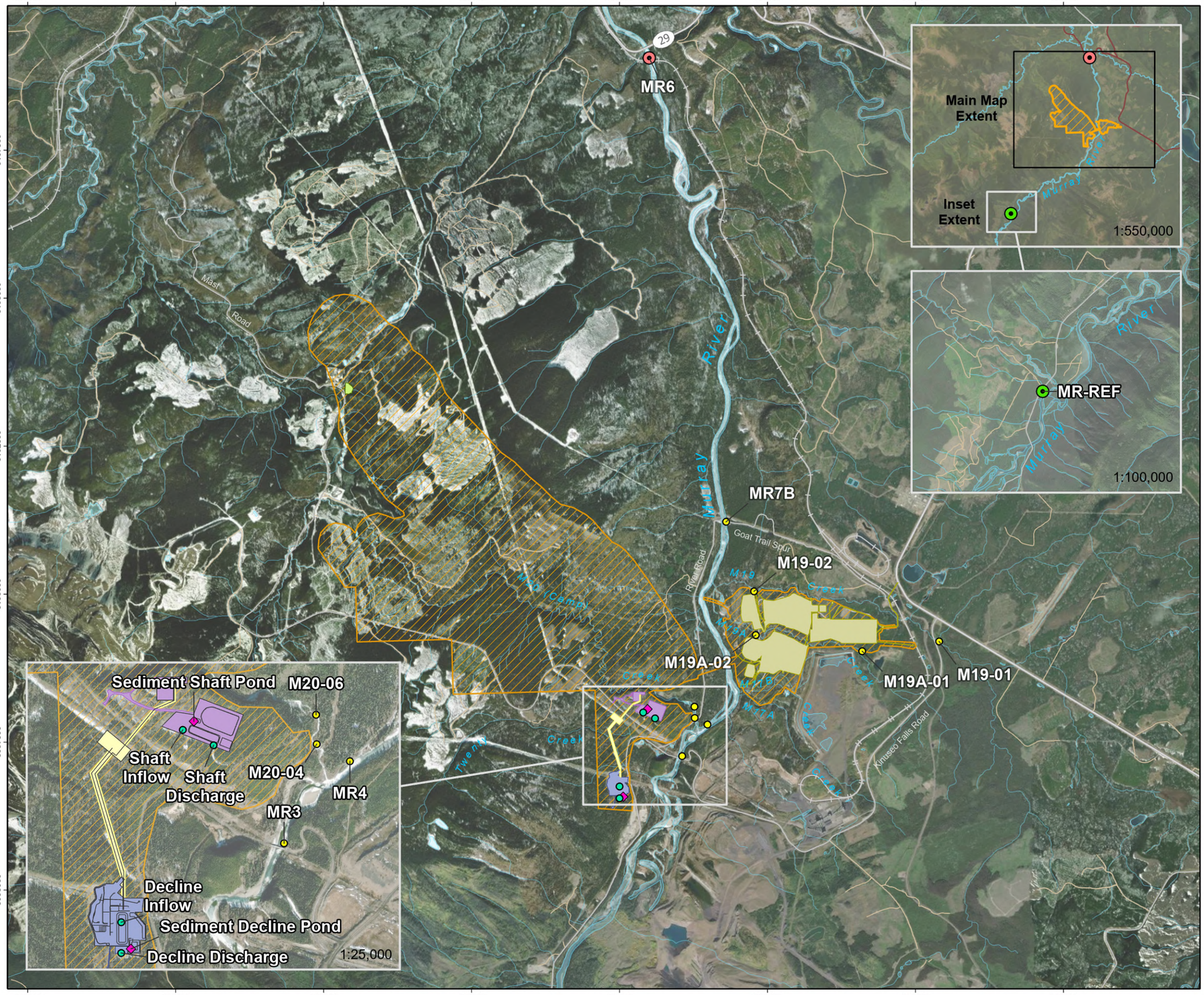
Table 3-2. Limits of effluent discharge characteristics from Permit #106666.

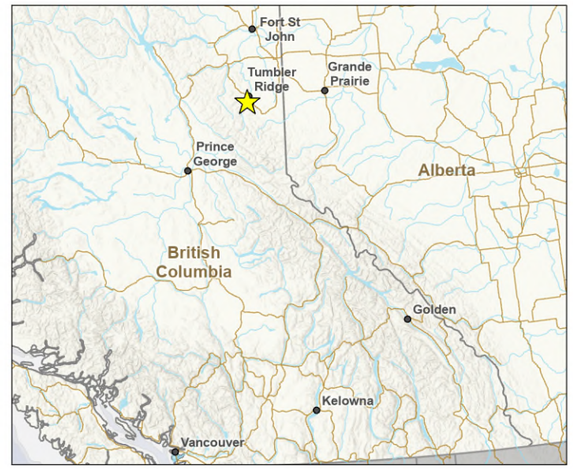
Parameter	Decline Site Limit	Shaft Site Limit
Total suspended solids (mg/L)	50	50
Total extractable hydrocarbons (mg/L)	15	15
pH	6.5-9.0	6.5-9.0
Cadmium, dissolved (mg/L)	0.0012	0.0035
Zinc (mg/L)	0.2	-

Table 3-3. Maximum daily discharge in the reporting period.

Site	Permitted Maximum discharge m^3/day	Maximum daily discharge m^3/day
Shaft Site Pond	1,000	345
Decline Site Pond	6,480	2,046

Contact Water and Receiving Water Monitoring Sites





0 500 1,000 1,500 2,000
Metres

Map Scale = 1:65,000 (printed on 11 x 17)
Map Projection: NAD 1983 UTM Zone 10N

N

- Exposure Site
- Reference Site
- Sediment Quality Sites

Water Quality Monitoring Sites

- Effluent
- Receiving Environment
- Highway
- Road
- Permitted Mine Area (2023)
- Detailed Infrastructure Polygons

Surface Infrastructure - Existing

- Decline Site
- Shaft Site

Surface Infrastructure - Permitted, Not Yet Constructed

- Coarse Coal Rejects and Coal Processing Site
- Power Line Infrastructure
- Secondary Shaft Site

Data Sources

- Permitted Mine Area (2023). HD Mining. 2023.
- Surface Infrastructure. HD Mining. 2025.
- Monitoring Sites. EDI. 2025.
- Watercourse, Waterbody. Canvec 1:50,000. Government of Canada. 2025.
- Primary Road, Secondary Road, Rail. Digital Road Atlas. Government of British Columbia. 2025.
- Basemap. World Hillshade. Esri, USGS, Earthstar Geographics, Vantor

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Checked By: JM
Date: 12/19/2025

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Figure 3-6

hd Mining

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Water quality sampling of receiving waters was conducted monthly to adhere to *EMA* Permit #106666. At MR-REF and MRW-CEA water quality samples were collected quarterly. In the reporting period, there were 28 exceedances at the receiving sites of the *BC Water Quality Guidelines* (BCWQG; Appendix B) (BC Ministry of Water, Land and Resource Stewardship 2025). Of the 28 exceedances, 19 occurred in M19 and M19A creeks where no construction activities have occurred. As no project activities occurred near M19 and M19A creeks, these sites have been excluded from the analysis.

The remaining nine exceedances occurred in the Murray River or M20 Creek. (Table 3-4) These included dissolved oxygen, turbidity, total suspended solids (TSS), dissolved zinc and total aluminum. These results are consistent with baseline results from previous years. Three of the nine exceedances occurred in upstream reference sites and another three occurred at site MR3 on the Murray River, which is upstream of M20 Creek and downstream of the decline site. The exceedances at MR3 were for TSS, turbidity and total aluminum and all occurred in November 2024 when TSS and turbidity were elevated due to the auger stirring up sediment. Total aluminum has historically exceeded when TSS is elevated. While discharge from the decline site could potentially impact water quality at MR3 the decline site discharges to ground approximately 600 m from the Murray River and it is expected that it will take three to six years for discharged water from the decline site to reach the Murray River.

The remaining three exceedances occurred over the winter at MR4 and MR7B: one for dissolved oxygen resulting from an iced-over probe, one for TSS, and one for turbidity. TSS and turbidity exceedances were expected due to the auger stirring up sediment. There were no other exceedances in M20 Creek or the Murray River downstream of the discharge gallery from the shaft site pond.

In summary, the locations of exceedances indicate water quality reflects baseline conditions and exceedances are un-related to Project activities occurring on site. These water quality exceedances (detailed below) will be reported to the province as part of the annual reporting requirements of *EMA* Permit #106666.

Table 3-4. Water quality exceedances in the Murray River and M20 Creek during the reporting period.

Reference/Receiving	Site	Parameter	Result	Guideline
Receiving	MR3	TSS	49.8 mg/L[1]	25 mg/L
		Turbidity	22.3 NTU[3]	10.55 NTU
		Total Aluminum	0.588 mg/L	0.22 mg/L
	MR4	Dissolved Oxygen	2.4 mg/L[3]	5 mg/L
		TSS	25.2 mg/L[3]	25 mg/L
	MR7B	Field Turbidity	12.6 NTU[3]	11.3 NTU
Reference	MR9	Total Aluminum	0.35 mg/L	0.26 mg/L
	MR10	Total Aluminum	0.191 mg/L	0.16 mg/L
	M20-05	Dissolved Zinc	0.0741 mg/L	0.014 mg/L

[1] Erroneous data caused by sediment being disturbed by auger and the sensor freezing.

3.2.3 SELENIUM IN FISH MONITORING (CONDITION 3.11)

The selenium in fish monitoring program tracks selenium concentrations across 12 sites: four on the M19 and M19A Creeks, two on M20 Creek, and six in the Murray River (Figure 3-6). Eleven sites were sampled in 2025; the 12th site, MR-REF, a far-field reference site upstream of all Project activities and activities associated with other projects on the Murray River, is sampled every three years. MR-REF is next scheduled for sampling in 2026.

Total selenium concentrations in water serve as performance measures that dictate future sampling requirements. Total selenium concentrations in water in M20 Creek fall between 1-2 mg/L which triggers periphyton and benthic tissue, and fish tissue/fish eggs sampling every three years in addition to the annual sediment sampling. The next sampling for tissue is scheduled for 2026.

Sediment monitoring results, sampled in 2025, were analyzed during the reporting period. Nine sampled sites reported sediment selenium concentrations below the provincial ALERT concentration of 2 ug/g (BC Ministry of Water, Land and Resource Stewardship 2025) (Figure 3-7). The two exceedances occurred at M20-06 (a reference site) and M20-04 (an exposure site). Given the large variability between the three replicates at M20-06 (evidenced by the standard deviation error bars in the figure), there is no meaningful difference in 2025 results between the reference and exposure sites. This

suggests that selenium concentrations in the M20 Creek stream sediments may be naturally elevated. This is consistent with past sediment sampling in M20 Creek where selenium concentrations are frequently between 2.5 and 3.5 mg/g.

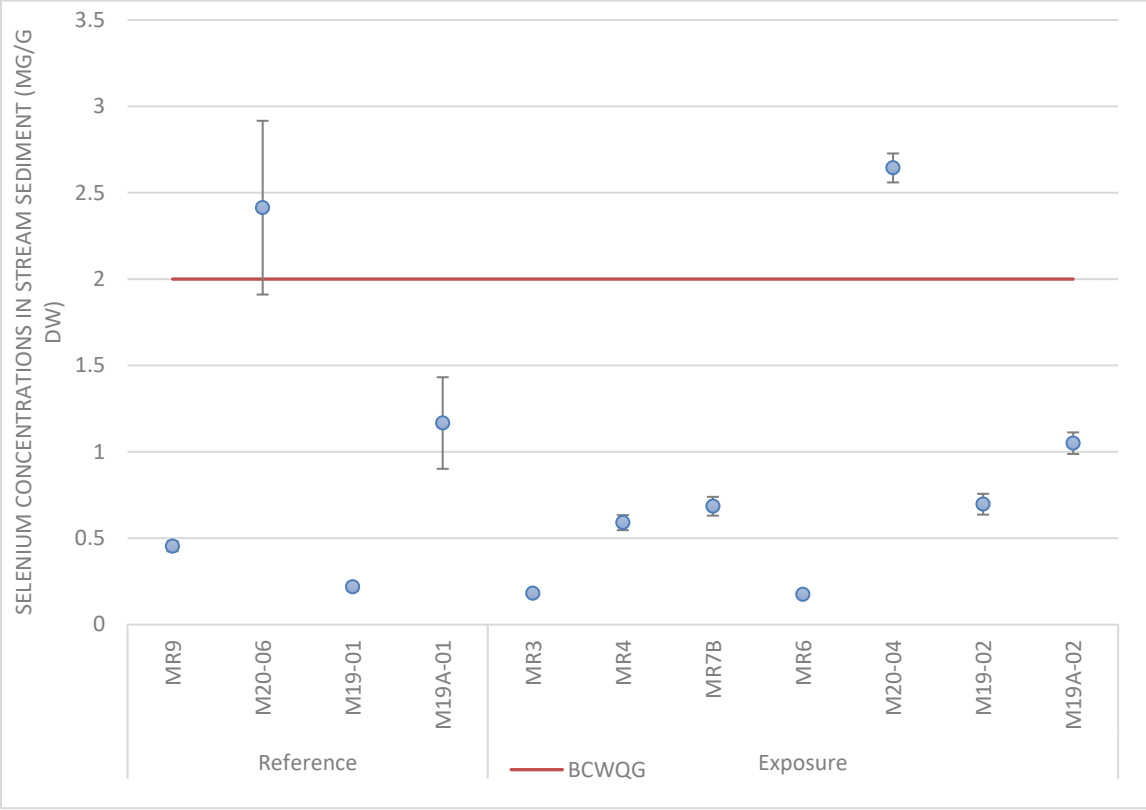


Figure 3-7. Mean selenium concentrations in sediment samples from all sites during the 2025 aquatic effects monitoring for the Murray River Coal Project. BCWQG for selenium alert concentrations (2 mg/g (dry weight [dw]) is shown in red and error bars are +/- 1 standard deviation.

3.3 SUBSIDENCE FOLLOW-UP PROGRAM (CONDITION 3.12)

The Subsidence Follow-up Program (SFUP) is required by Condition 3.12 to verify the accuracy of the environmental assessment as it pertains to the adverse environmental effects of subsidence caused by or associated with the Designated Project. Subsidence monitoring will be initiated prior to the commencement of operations. Therefore, no monitoring was done during the reporting period.

Engagement with ECCC on the SFUP continued during construction. The Project entered care and maintenance in July 2025; the follow-up program will be updated prior to re-commencing construction.

3.4 MIGRATORY BIRDS FOLLOW-UP PROGRAM (CONDITION 4.4)

The Migratory Birds Follow-up Program (MBFUP; Condition 4.4) is required to:

- determine the effectiveness of the mitigation measures implemented by the Proponent to avoid harm to migratory birds, their eggs and nests, including the measures to comply with Conditions 4.1 and 4.2; and
- verify the use of the subsidence area by migratory birds identified by the environmental impact statement.

3.4.1 CONSTRUCTION MITIGATION (CONDITION 4.1 AND 4.2)

Section 4.2 of the MBFUP outlines mitigation measures specific to birds and their habitat, and the protection of their populations. Mitigation measures relating to timing windows and setbacks, pre-clearing nest surveys, waste disposal, water treatment/sediment ponds, and lighting control are implemented or confirmed by the site Environmental Monitors, who conduct weekly inspections of the site, and work with construction contractors and the wildlife QI in advance of planned new disturbances.

Results from environmental monitoring and pre-clearing surveys completed during the period of October 1, 2024, to September 30, 2025, found no evidence of active breeding, bird morbidity or bird mortality in accordance with the MBFUP. Mitigation measures included sealing doors and windows on tents, vehicles and buildings, installing thick plastic sheeting to cover potential nesting areas between seacans, and maintaining construction activity during the breeding bird window to deter birds from establishing nests in active work sites. Mitigations measures were successfully implemented and effective, as evidenced by the absence of bird mortality, bird morbidity, or active breeding within construction zones.

No observations of bird morbidity or mortality were recorded during weekly site inspections. Regular environmental monitoring efforts included pre-clearing surveys for nesting birds in the Project footprint and monitoring of site infrastructure; no nesting birds or evidence of breeding activity were detected. Incidental bird observations included birds wading in site ponds at both the decline site and shaft site; however, no construction or clearing activities occurred in areas where birds were actively observed.

A pre-clearing survey for borrow pit construction activities, plus a 100 m buffer, was conducted on February 8, 2025, outside the breeding bird window to investigate the

potential for wildlife habitat features, such as cavity nests or stick nests, which may be protected year-round. Within this survey area, four trees containing viable pileated woodpecker cavities, one nonviable pileated woodpecker cavity tree, and one stick nest were identified. A 100 m no-disturbance buffer was established around these wildlife habitat features.

A second pre-clearing surveys was also conducted at the shaft site on February 9, 2025. The areas proposed for clearing plus a 100 m buffer was surveyed for wildlife habitat features, such cavity nests or stick nests, which may be protected year-round. No wildlife habitat features that met the specifications for features with year-round protections were observed in this area. Clearing took place at the borrow pit and shaft site between early March and early April 2025.

3.5 HEALTH OF INDIGENOUS PEOPLE FOLLOW-UP PROGRAM (CONDITION 6.3)

The purpose of the Health of Indigenous People Follow-up Program (HIPFUP) is to verify the accuracy of the environmental assessment as it pertains to the health of Indigenous Peoples. Potential pathways for Contaminants of Potential Concern (COPCs) will be monitored through exposure pathways in air, soil, vegetation, and water. Over 30 potential COPCs were screened and 10 (including arsenic) are identified (Table 5-1 of the HIPFUP). In addition to the 10 COPCs, Polycyclic Aromatic Hydrocarbons (PAHs) will be monitored in soils and surface water as per guidelines in Table 5-6 and Table 5-7 of the HIPFUP which show Canadian Council of Ministers of the Environment (CCME) and BC WQGs, and BC Contaminated Sites Regulation, BC Reg 375/96 (Government of British Columbia 1996). Air quality monitoring will include dustfall, total suspended particulates (TSP), and particulate matter with a diameter of 10 microns or less (PM_{10}).

The following activities from the HIPFUP were undertaken during the reporting period:

- air quality monitoring (Conditions 6.1 and 6.3.1); and
- surface water quality monitoring (Condition 6.3.2).

3.5.1 AIR QUALITY MONITORING (CONDITION 6.3.1)

Monthly dustfall (DF) monitoring was conducted at nine stations upwind and downwind of the mine site (Table 3-5; Figure 3-8). Dustfall station 10 (at the CPP site, where construction activities have not yet been initiated) and station 11 (outside the *Mines Act* permit boundary) were installed in March 2025 per the HIPFUP. A MetOne

Environmental Beta Attenuation Mass Monitor (E-BAM) was purchased and was used to monitor PM_{10} and TSP.

Dustfall sampling was conducted according to the draft *Standard Operating Procedure for the Sample Collection of Dustfall (Settleable Particulate Matter) and Metals* (BC Environmental Protection and Sustainability 2018). Provincial guidelines for total DF were rescinded in 2006 following a review of methodologies that concluded the methods are outdated and not recommended for monitoring. HD continues to monitor dustfall for comparative purposes to baseline conditions and to support calculating deposition rates.

Table 3-5. Total Dustfall by Month for the Reporting Period.

2024-2025 Monitoring Period	Total Dustfall Result (mg/dm²/day)								
	DF2	DF3	DF4	DF5	DF6	DF8	DF9	DF10	DF11
October	<0.18	<0.19	1.17	5.13	3.82	<0.19	0.64	N/A	N/A
November	N/A	<0.22	0.54	<0.22	<0.24	0.5	<0.24	N/A	N/A
December	<0.13	<0.31	0.98	<0.31	<0.31	<0.31	<0.31	N/A	N/A
January	<0.16	<0.17	2.97	<0.15	<0.16	<0.10	0.44	N/A	N/A
February	<0.33	<0.27	0.84	<0.33	<0.31	<0.28	<0.28	N/A	N/A
March	0.26	<0.21	2.14	<0.18	<0.20	<0.20	0.2	0.99	<0.20
April	0.69	1.1	4.62	<0.24	5.28	0.53	0.41	2.89	0.8
May	0.36	<0.23	1.54	2.87	0.37	0.48	0.52	0.91	0.77
June	N/A	N/A	N/A	N/A	1.97	1.82	0.87	N/A	N/A
July	0.51	<0.24	2.35	1.16	0.56	1.7	0.57	0.8	0.9
August	0.36	<0.12	1.58	3.15	2.4	0.59	13.7	1	<0.12
September	0.34	<0.22	0.81	1.48	0.68	1.16	7.8	2.82	<0.24

* DF 10 and 11 were installed in March 2025; one cooler with 6 samples was lost by the lab and results were not received by HD Mining in June; results are recorded as < when sample volume is small.

Acid deposition rates were calculated for nitrate and sulfate anions from dustfall samples. The formulae used are as follows:

Nitrate Factor (Corrected)

$$Factor = \left(\frac{1\ eq}{14{,}007\ mg}\right) x \left(\frac{1{,}000{,}000\ dm^2}{1\ ha}\right) x \left(\frac{365\ days}{1\ year}\right) \approx 26{,}058$$

Sulphate Factor (Corrected)

$$Factor = \left(\frac{1\ eq}{48{,}030\ mg}\right) x \left(\frac{1{,}000{,}000\ dm^2}{1\ ha}\right) x \left(\frac{365\ days}{1\ year}\right) \approx 7{,}600$$

Final Calculation per Month

Nitrate sample reading x 26,058 = X
Sulfate sample reading x 7,600 = Y
X + Y = eq/ha/year

In the sampling year there were three months where acid deposition rates were within or exceeded critical loads (Table 3-6). October 2024 at DF5 and April 2025 at DF6 were within the critical load and August 2025 at DF9 (decline site) exceeded the critical load. However, average annual rates were well below the critical load at all sites. During August, while the Project had returned to care and maintenance, it is expected that hot temperatures (30+° Celsius) led to dry conditions and increased dust. Additionally, road dust from Kinuseo Falls Road may have influenced deposition during periods of high use.

Table 3-6. Acid Deposition from Sulphate and Nitrate in Dustfall by Month.

2024-2025 Monitoring Period	Acid Deposition (eq/ha/year)								
	DF2	DF3	DF4	DF5	DF6	DF8	DF9	DF10[2]	DF11[2]
October	63	120	63	686[1]	63	63	63	N/A	N/A
November	99	64	81	74	69	69	85	N/A	N/A
December	99	136	123	148	167	158	149	N/A	N/A
January	81	63	76	76	63	63	63	N/A	N/A
February	123	79	89	142	128	98	83	N/A	N/A
March	89	86	96	83	83	78	81	89	89
April	74	69	74	69	640[1]	69	69	183	69
May	64	64	64	64	64	64	64	69	69
June[3]	N/A	N/A	N/A	N/A	156	120	245	N/A	N/A
July	69	151	151	189	98	236	95	99	69
August	105	98	102	92	69	98	1090[1]	107	103
September	69	64	69	167	69	69	69	69	69
Annual Average	85	90	90	163	139	99	180	103	78

2024-2025 Monitoring Period	Acid Deposition (eq/ha/year)								
	DF2	DF3	DF4	DF5	DF6	DF8	DF9	DF10[2]	DF11[2]
Estimate Critical Load Value Range for Project Area	401-700	401-700	401-700	401-700	401-700	401-700	401-700	401-700	401-700

[1] Within or exceeding critical load range; [2] DF 10 and 11 were installed in March 2025; [3] One cooler with 6 samples was lost by the lab and results were not received by HD Mining.

Air quality monitoring for PM_{10} and TSP was conducted at three project-specific sites from February to June 2025 (Table 3-7; Figure 3-8). PM_{10} and TSP sampling was suspended when the Project entered care and maintenance and will be activated when the construction phase re-commences.

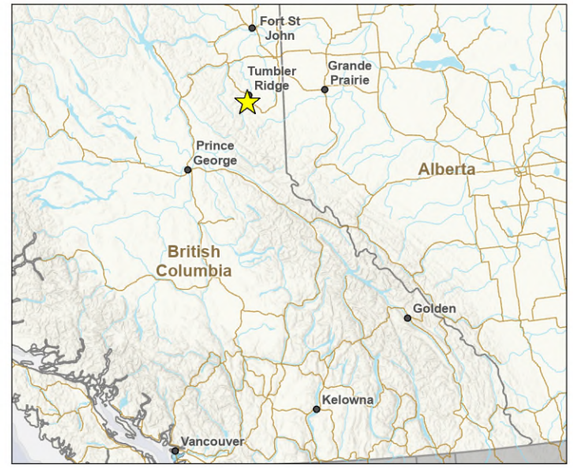
Due to challenges with operating the E-BAM under severe winter conditions there is missing data for some sites in February to April. June PM_{10} data for Site 1 is missing due to battery challenges; as the site was winding down into care and maintenance, re-sampling did not occur. The relevant 24-hour air quality criteria, as defined by BC standards (BC Ministry of Environment and Climate Change Strategy 2018), are 120 µg/m^3 for TSP and 50 µg/m^3 for PM_{10}. During the five-month period, only one exceedance of these criteria was recorded: a single TSP exceedance in June at Site 3. General site clean up was being completed during this exceedance, and increased traffic paired with wind gusts (43 km/hr) are expected to have led to the elevated TSP for this period.

Table 3-7. PM10 and TSP by month for the reporting period.

Month	PM_{10} (ug/m^3)			TSP (ug/m^3)		
	Site 1*	**Site 2**	**Site 3**	**Site 1**	**Site 2**	**Site 3**
February	N/A	0	N/A	N/A	0.9	N/A
March	N/A	N/A	6.6	4.0	3.2	N/A
April	1.0	1.9	3.7	N/A	4.1	2.6
May	2.1	0	26.4	12.5	1.2	36.1
June	N/A	5.2	7.9	13.2	22.1	132.1

* Site 1 is adjacent to DF11 at the CPP site. Site 2 is adjacent to DF5, uphill and upwind of the shaft site. Site 3 is located at the decline site.

Murray River Coal Project
Air Quality Monitoring Sites



0 500 1,000 1,500 2,000
Metres

Map Scale = 1:50,000 (printed on 11 x 17)
Map Projection: NAD 1983 CSRS UTM Zone 10N

N

Air Quality Monitoring Sites
- Fugitive Dustfall
- PM_{10} and Total Suspended Particulates

Primary Road
Secondary Road
Rail
Watercourse
Waterbody

Permitted Mine Area (2023)

Surface Infrastructure - Existing
- Decline Site
- Shaft Site

Surface Infrastructure - Permitted, Not Yet Constructed
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- Forest Service Road. Government of Canada. 2025.
- Primary Road, Secondary Road, Rail. Digital Road Atlas. Government of British Columbia. 2025.
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Figure 3-8

hd Mining

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3.5.2 SOIL, VEGETATION, AND WATER QUALITY MONITORING (CONDITION 6.3.2)

Water quality monitoring was conducted as per *EMA* Permit #106666. The COPCs identified in the HIPFUP were monitored at 12 receiving water sites in May and September 2025. The results were compared to the 95th percentile for the surface water COPCs and there were no exceedances. Analysis was not conducted for PAHs as in May 2025, construction paused, plans to return to care and maintenance began, and the mine returned to care and maintenance in July 2025.

3.6 CURRENT USE OF LANDS AND RESOURCES FOR TRADITIONAL PURPOSES FOLLOW-UP PROGRAM (CONDITIONS 7.11)

The purpose of the CUFUP is to verify the accuracy of the environmental assessment as it pertains to the effects of changes caused by the Designated Project to the environment on fishing, harvesting, hunting and trapping activities for traditional purposes.

The CUFUP is informed by engagement with IGs and data collected from other monitoring programs, including Aquatic Effects Monitoring Program, Invasive Plants and Vegetation Management Plan; Section 3.3.1 of the HIPFUP; Section 3.4.1 of the Noise Communication Plan; Selenium Management Plan, and Wildlife Management Plan.

In December 2024, HD Mining provided a summary presentation of the CUFUP to the IGs and offered to meet and discuss. A follow-up email was sent in February 2025 to the groups that had not responded (Table 2-1). Three IGs (Halfway River First Nation [HRFN], Sucker Creek First Nation [SCFN], and McLeod Lake Indian Band [MLIB]) responded to HD Mining. Subsequently, virtual meetings were held with HRFN and MLIB in February 2025, and an email exchange of ideas with SCFN occurred in March 2025. Input has been documented and will be considered in the implementation of the CUFUP when the Project re-commences construction.

3.7 CARIBOU FOLLOW-UP PROGRAM (CONDITION 7.14)

The Caribou Follow-up Program (CFUP) is required to:

- verify the accuracy of the environmental assessment; and
- determine the effectiveness of the mitigation measures pertaining to the Designated Project's adverse environmental effects on the Quintette herd of

Southern mountain caribou (Rangifer tarandus caribou) and its critical habitat.

Field studies to validate habitat suitability models (Condition 7.12) were completed in 2023 and 2024 (ERM Consultants Canada Ltd. 2024) and results were included in the Decision Statement Annual Report – October 1, 2023 to September 30, 2024 (Annual Report 2023-2024). The average overall suitability rating across the 23 Local Study Area (LSA) plots surveyed was 4.5 (moderate low/low) on a scale where 1 is high and 6 is nil. Ratings from habitat suitability models from validation plots aligned well with existing models developed through the environmental assessment process (EDI Environmental Dynamics Inc. 2014).

Mitigations described in the CFUP were implemented during the reporting period (DS Condition 7.13). All project construction activities occurred within the decline and shaft sites, and there is no identified high quality caribou habitat in these areas or the site-controlled access roads. Provincial mapping indicates that the site is Matrix 1 habitat. Habitat suitability field plots in these areas indicate Very Low suitability for Growing Living and Winter Living Habitat, and Low suitability for Type 1 Matrix Habitat. A record of incidental wildlife observations and the wildlife camera program have been maintained. Caribou sitings were not identified during the reporting period. Camera program data are fully analyzed on a calendar year basis and quarterly on a provisional basis; therefore, fully analyzed camera data are available from October 1-December 31, 2024, and provisional results from January 1 to September 30, 2025 are pending final analysis.

Engagement with ECCC on the CFUP continued during the reporting period. HD Mining will update the CFUP prior to re-commencing construction.

4 COMMUNICATIONS PLANS

The following communication plans were in place during the reporting period.

4.1 HEALTH OF INDIGENOUS PEOPLES COMMUNICATION PLAN (CONDITION 6.5)

The purpose of the Health of Indigenous Peoples Communication Plan (HIPCP) is to identify a plan to communicate the results of the HIPFUP, required by Condition 6.3 of

the DS. The plan includes procedures to communicate any associated potential health risks, updated human health risk assessment, and modified or additional mitigation measures resulting from the HIPFUP, or the development of site performance objectives referred to in DS Condition 6.4.

During the 2024-2025 reporting period, no water or air quality monitoring identified potential health risks that required communications with IGs.

4.2 NOISE COMMUNICATION PLAN (CONDITIONS 7.1 AND 7.3)

The Noise Communications Plan addresses:

- Condition 7.1 which requires a plan to communicate information related to noise generated by the Project; and
- Condition 7.3 which requires a protocol for receiving complaints related to the exposure to noise generated by the Project.

During the 2024-2025 reporting period, there were no elevated noise levels generated at the Project site that required notifying IGs and HD Mining did not receive any noise complaints.

4.3 ACCIDENTS AND MALFUNCTIONS COMMUNICATION PLAN (CONDITION 10.5)

The Accidents and Malfunctions Communication Plan includes:

- the types of potential accidents and malfunctions that require notifications to IGs;
- the manner by which each IG shall be notified by the Proponent of an accident of malfunction and of any opportunities for the IGs to assist in the response to the accident or malfunction; and
- the contact information of the representatives of the Proponent that the IGs may contact and of the representatives of each IG to which the Proponent provides notification.

There were no accidents or malfunctions at the site during the 2024-2025 reporting period that required IGs to be notified.

5 MANAGEMENT PLANS

5.1 HERITAGE MANAGEMENT PLAN (CONDITION 8.2)

The Heritage Management Plan (HMP) addresses DS Conditions 8.1 to 8.3. The plan describes the types of physical and cultural heritage features and structures, sites or things of historical, archaeological, paleontological or architectural significance that may be encountered during construction, and the procedures for monitoring and responding if such features are encountered. A chance find procedure is in place, and all staff and contractors working at site were provided orientation training that addressed chance finds. No chance finds were reported during the 2024-2025 reporting period.

Review of the plan with the IGs took place during the 2023-2024 reporting period. A provincial review process is ongoing with the BC Environmental Assessment Office; once the HMP is finalized through that process, it will be posted to the HD Mining website (per DS Condition 2.10) and provided to the IGs.

6 OTHER DECISION STATEMENT CONDITIONS

Table 6-1 summarizes activities associated with other conditions in the DS.

Table 6-1. Decision Statement Conditions

Condition		Activity during Reporting Period
2.1	Precautionary approach	• Qualified Individuals (QIs) have been engaged to develop and implement the follow up programs in a manner that meets the DS Conditions.
2.2	Consultation	• See Section 2 of this report.
2.3, 2.7	Consultation with Indigenous groups	• See Section 2 of this report.
2.4, 2.6	Follow-up program requirements	• Developed follow-up programs per Conditions 2.4 and 2.6.
2.5	Update of follow-up programs	• Engagement with Indigenous groups (IGs) and relevant authorities continued on the follow-up programs (see Table 2-1 for details).
2.8, 2.9	Annual report	• The Annual Report 2023-2024 was developed in accordance with Conditions 2.8 and 2.9 and submitted on December 23, 2024.

Condition		Activity during Reporting Period
2.10	Publish to internet	• The Annual Report 2023-2024 and the updated Implementation Schedule reflecting the Project's change to care and maintenance have been posted to HD Mining's website.
2.11	Transfer of ownership	• There was no transfer of ownership, care or control or management of the Designated Project in whole or in part during the reporting period.
2.12	Material change(s)	• No material changes were made to the Designated Project that required notice be provided to the Impact Assessment Agency pursuant to Condition 2.12.
2.13	Material change(s)	• No material changes were made to the Designated Project that required any action pursuant to Condition 2.13.
3.1	Erosion and sediment control measures	• Implemented erosion and sediment control measures for clearing and construction activities at the decline site throughout the year and maintained through daily and weekly inspections during construction and monthly inspections during care and maintenance. • Implemented erosion and sediment control measures for clearing and construction activities at the shaft site throughout the year and maintained through daily and weekly inspections during construction and monthly inspections during care and maintenance. • No new construction activity was initiated at the coal processing site.
3.2	Rock weirs	• See Section 3.1 of this report.
3.3	Construction near water	• Not applicable – no construction near water occurred during the reporting period.
3.4	Intake pumping system	• Not applicable – no construction of intake works occurred during the reporting period.
3.5	Dewatering activities of fish bearing waterbodies	• Not applicable – no dewatering of fish-bearing waterbodies occurred during the reporting period.
3.6	Coarse coal rejects and waste rock mitigations	• Not applicable - coarse coal rejects (CCR) not yet present; no new material added to the waste rock pile during the reporting period.
3.7	Contact water treatment	• Contact water runoff is collected at the decline site and the shaft site. See Section 3.2.2 of this report.
3.8	Fish and Fish Habitat Follow-up Program	• See Section 3.1 of this report.

Condition		Activity during Reporting Period
3.9, 3.10	Geochemical characterization and Water quality	• See Section 3.2 of this report.
3.11	Effects of selenium releases on fish	• See Section 3.2 of this report.
3.12	Subsidence Follow-up Program	• See Section 3.3 of this report.
4.1 to 4.4	Migratory Birds	• See Section 3.4 of this report. • Condition 4.3 (pre-construction surveys) was completed during the 2023-2024 reporting period.

6.1	Fugitive dust mitigations	• Implemented fugitive dust mitigation measures and maintained through regular inspections during construction.
		• Examples of mitigation measures include:
		  ○ Ongoing visual monitoring for dust control; and
		  ○ Reduce vehicle speed to minimize dust.
		• No new construction activity was initiated at the coal processing site.
		• The Project re-entered care and maintenance in July 2025, eliminating construction-related dust effects.

6.2	Speed limits	• Speed limits are enforced on private access roads.
6.3	Health of Indigenous Peoples Follow-up Program	• See Section 3.5 of this report
6.4	Beaver dam removal	• Not applicable - no beaver dams removed from M19A Creek.
6.5	Health of Indigenous Peoples Communication Plan	• See Section 4.1 of this report
6.6	Engine maintenance program	• Continued implementation of engine maintenance program.
7.1, 7.3	Noise Communication Plan	• See Section 4.2 of this report
7.2	Noise mitigations	• Implemented noise mitigation measures throughout the reporting period and maintained through weekly to daily inspection during construction, and monthly inspection during care and maintenance. • Examples of mitigation measures include: ○ Maintain vehicles in proper working order to reduce noise;

Condition		Activity during Reporting Period
		○ Turn off equipment when not in use; avoid unnecessary idling; and ○ Installed noise reduction silencers on main ventilating fans.
7.4	Road closure notifications to IGs	• Not applicable - no road closures during the reporting period.
7.5	Access to sacred and camping sites	• There was no change in access to sacred and camping sites during the reporting period. • Project activities all occurred within the permitted footprint and caused no change in access during the reporting period.
7.6	Verification of the presence/absence of traditional and medicinal plants	• Verification completed in 2023 and 2024.
7.7, 7.8	Mineral lick/wallow	• Remote wildlife cameras are in place to monitor the mineral lick/wallow and the game trail that accesses this area. • This feature is outside the zone of subsidence; no Project effects anticipated during construction or care and maintenance.
7.9	Tree buffers	• Maintained tree buffers around the decline and the shaft site. • Clearing has not yet occurred at the coal processing site. • The Murray River Forest Service Road is now a public road (Kinuseo Falls Road).
7.10	Progressive reclamation	• Not applicable – Project moved into care and maintenance in July 2025; progressive reclamation scheduled for the second year of operation.
7.11	Current Use Follow Up Program	• See Section 3.6 of this report.
7.12	Caribou field surveys	• Caribou field surveys were conducted in 2023 and 2024 and reported on in the 2023-2024 Annual Report. Additional surveys are not anticipated.
7.13 to 7.15	Caribou	• See Section 3.7 of this report.
7.16, 11.1-11.3	Implementation Schedule	• Submission of the pre-construction Implementation Schedule was completed during the 2023-2024 reporting period. • Submitted an updated schedule to IAAC and the IGs on August 5, 2025, to reflect the change in status to care and maintenance. • Posted the updated schedule to the HD website.

Condition		Activity during Reporting Period
8.1 to 8.3	Heritage Management Plan	• See Section 5 of this report.
9.1	Environmental monitoring	• HD Mining has been an active participant in the Murray River Aquatic Cumulative Effects Assessment Framework Steering Committee and will participate for the duration of the Project, or as long as the Committee is operational. No meetings were held during the reporting period. • HD Mining continues to engage and share monitoring data to support a cumulative understanding of environmental conditions.
10.1 to 10.5	Accidents and malfunctions	• The site maintains an up-to-date Mine Emergency Response Plan. • No accidents or malfunctions occurred at site during the reporting period. • See Section 4.3 of this report for the communication plan.
12.1 to 12.2	Record Keeping	• Project records are maintained at HD Mining's head office in Vancouver, BC.

7 ACRONYMS AND ABBREVIATIONS

Acronym or Abbreviation	Definition
AMCP	Accidents and Malfunctions Communication Plan
Annual Report 2023-2024	Decision Statement Annual Report – October 1, 2023 to September 30, 2024
Annual Report 2024-2025	Decision Statement Annual Report – October 1, 2024 to September 30, 2025
BC	British Columbia
BCWQG	British Columbia Water Quality Guidelines
CCME	Canadian Council of Ministers of the Environment
CCR	coarse coal rejects
CFUP	Caribou Follow-up Program
COPC	Contaminants of Potential Concern
CUFUP	Current Use of Lands and Resources for Traditional Purposes Follow-Up Program
DRFN	Doig River First Nation
DNA	deoxyribonucleic acid
DS	Decision Statement
EAC Application/EIS	Environmental Assessment Certificate/Environmental Impact Statement for the Murray River Coal Project
ECCC	Environment and Climate Change Canada
eDNA	Environmental DNA
e.g.,	for example (Latin *exempli gratia*)
EMA	*Environmental Management Act*
ESV	Exact Sequence Variant
et al.	and others (Latin *et alia*)
FFHFUP	Fish and Fish Habitat Follow-up Program
FLB	Field Leach Barrels
FNITR	First Nations Independent Technical Review
HCT	humidity cell test
HD Mining or Proponent	HD Mining International Ltd.
HIPCP	Health of Indigenous Peoples Communication Plan
HIPFUP	Health of Indigenous Peoples Follow-Up Program
HMP	Heritage Management Plan
HRFN	Halfway River First Nation
IAAC	Impact Assessment Agency of Canada
i.e.,	that is, (Latin *id est*)

Acronym or Abbreviation	Definition
IG	Indigenous group
LSA	Local Study Area
MBFUP	Migratory Birds Follow-up Program
MLIB	McLeod Lake Indian Band
ML/ARD and Se FUP	Metal Leaching/Acid Rock Drainage and Selenium Follow-up Program
NCP	Noise Communication Plan
PAH	Polycyclic Aromatic Hydrocarbons
PCR	Polymerase Chain Reaction
Project	Murray River Coal Project
QI	Qualified Individual
ROM	run of mine
SCFN	Sucker Creek First Nation
SFUP	Subsidence Follow-up Program
TSS	total suspended solids
TSP	total suspended particulates

8 UNITS OF MEASURE

Acronym or Abbreviation	Definition
µm	micrometre
µg/g	microgram per gram
µg/L	microgram per litre
dw	dry weight
eq/ha/year	equivalents/hectare/year
ha	hectare
km	kilometre
m	metre
mL	millilitre
m^3	cubic metres
mg/L	Milligrams per litre
mm	millimetre
NTU	Nephelometric Turbidity Unit
PM_{10}	particulate matter with a diameter of 10 microns or less

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APPENDIX

APPENDIX A PHOTOGRAPHS

Appendix Photo A-1. Dewatering piping from the underground to the primary pond at the decline site on March 29, 2025.

Appendix Photo A-2. Monorail system and hoist house construction progress on January 1, 2025.

Appendix Photo A-3. Hoist house and monorail system construction progress to February 26, 2025.

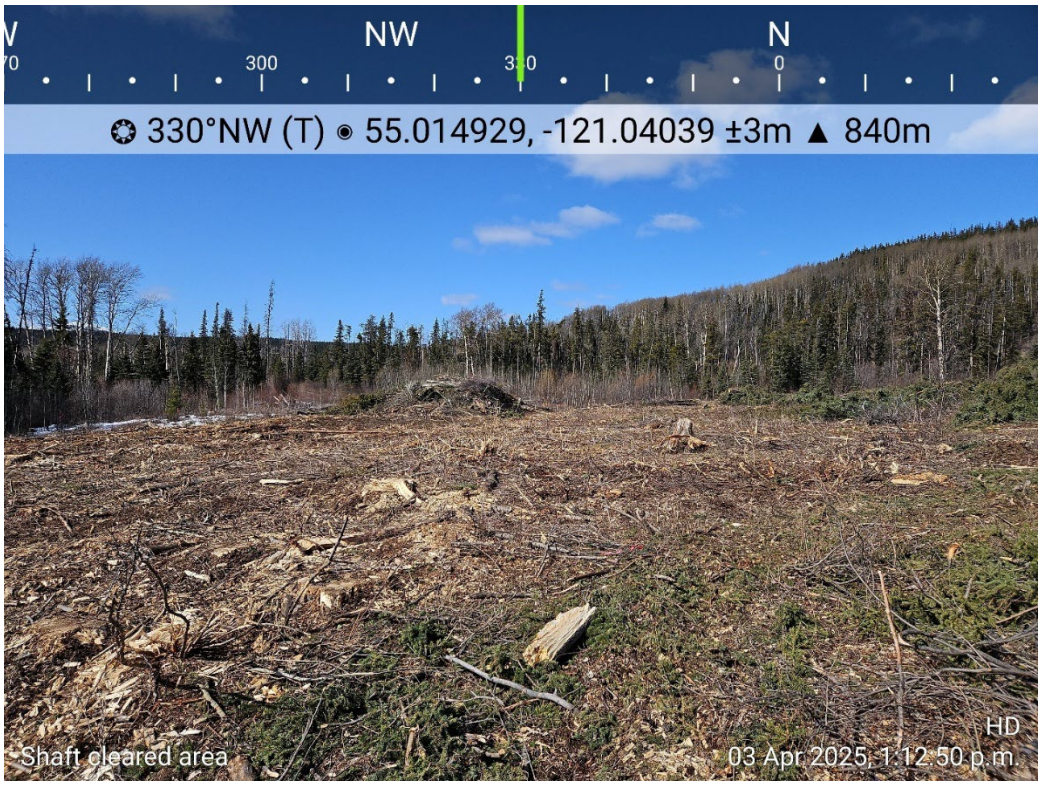
Appendix Photo A-4. Flagging the wildlife buffer zone for tree clearing at the decline site on March 4, 2025.

Appendix Photo A-5. Tree clearing activities at the decline site on March 12, 2025.

Appendix Photo A-6. Topsoil stockpile at the decline site after tree clearing activities at its long term location (April 23, 2025).

Appendix Photo A-7. Example of prevention of bird nesting on infrastructure at the decline site - doors to buildings and tents closed (May 22, 2025).

Appendix Photo A-8. Bear proof bins used for smaller waste at the decline site during care and maintenance (August 27, 2025).



Appendix Photo A-9. Cleared area at the shaft site on April 3, 2025.

Appendix Photo A-10. Timber from tree clearing activities at the shaft site April 24, 2025.

APPENDIX B BC WQGS EXCEEDANCES DURING 2024-2025 REPORTING PERIOD

Water Quality Exceedance Summary

Class	Analyte	Site ID	Sample ID	Date sampled	Units	BCWQG - Chronic aquatic life	BCWQG - Acute aquatic life	Sample value
In-situ								
	Dissolved oxygen	MR-4	FJ2500347-004	2025-01-30	mg/L	8	5	***2.4***
	Dissolved oxygen	M19-01	FJ2502896-020	2025-09-16	mg/L	8	5	***7.38***
	Dissolved oxygen	M19-02	FJ2502553-007	2025-08-19	mg/L	8	5	***6.68***
	Dissolved oxygen	M19A-01	FJ2502553-006	2025-08-19	mg/L	8	5	***5.99***
	Dissolved oxygen	M19A-01	FJ2502896-019	2025-09-16	mg/L	8	5	***6.18***
	Dissolved oxygen	M19A-01	FJ2501951-017	2025-06-24	mg/L	8	5	***6.71***
	Dissolved oxygen	M19A-01	VA25B8363-015	2025-07-22	mg/L	8	5	***5.36***
	Field Turbidity	MR-7B[1]	FJ2500340-008	2025-01-29	NTU		11.3	***12.6***
Physical								
	TSS	MR-3[1]	VA24D2330-010	2024-11-27	mg/L		25	***49.8***
	Turbidity	MR-3[1]	VA24D2330-010	2024-11-27	NTU		10.55	***22.3***
	TSS	MR-4[1]	FJ2403865-011	2024-12-18	mg/L		25	***25.2***
Inorganics								
	Sulphate (SO4)	M19-02	VA24D2330-017	2024-11-26	mg/L	429		***439***
	Sulphate (SO4)	M19A-01	FJ2500536-009	2025-02-19	mg/L	429		***479***
	Sulphate (SO4)	M19A-01	FJ2500896-016	2025-03-26	mg/L	429		***547***
	Sulphate (SO4)	M19A-02	FJ2500896-018	2025-03-26	mg/L	429		***481***
	Sulphate (SO4)	M19A-02	FJ2403356-017	2024-10-29	mg/L	429		***461***
	Sulphate (SO4)	M19A-02	FJ2403865-018	2024-12-17	mg/L	429		***434***
	Sulphate (SO4)	M19A-02	FJ2502896-021	2025-09-16	mg/L	429		***446***
Total metals								
	Aluminum (Al)	MR-10	VA24D4317-001	2024-12-19	mg/L	0.16		***0.191***
	Aluminum (Al)	MR-9	FJ2501149-005	2025-04-22	mg/L	0.26		***0.35***
	Aluminum (Al)	MR-3	VA24D2330-010	2024-11-27	mg/L	0.22		***0.588***
	Iron (Fe)	M19A-01	VA25B8363-015	2025-07-22	mg/L		1	***1.23***
	Iron (Fe)	M19A-01	FJ2502896-019	2025-09-16	mg/L		1	***1.53***
Dissolved metals								
	Iron (Fe)	M19A-01	VA25B8363-015	2025-07-22	mg/L		0.35	***0.712***
	Iron (Fe)	M19A-01	FJ2502553-006	2025-08-19	mg/L		0.35	***0.469***
	Iron (Fe)	M19A-01	FJ2502896-019	2025-09-16	mg/L		0.35	***1.11***
	Nickel (Ni)	M19A-01	FJ2500536-009	2025-02-19	mg/L	0.0002	0.0002	***0.00074***
	Zinc (Zn)	M20-05	FJ2501169-001	2025-04-23	mg/L	0.014	0.078	***0.0741***

Exceedance colour key:		***Exceeds BCWQG - Chronic aquatic life***
		Exceeds BCWQG - Acute aquatic life
		Exceeds more than one guideline
	[1]	Reference Site for TSS and Turbidity is MR-9