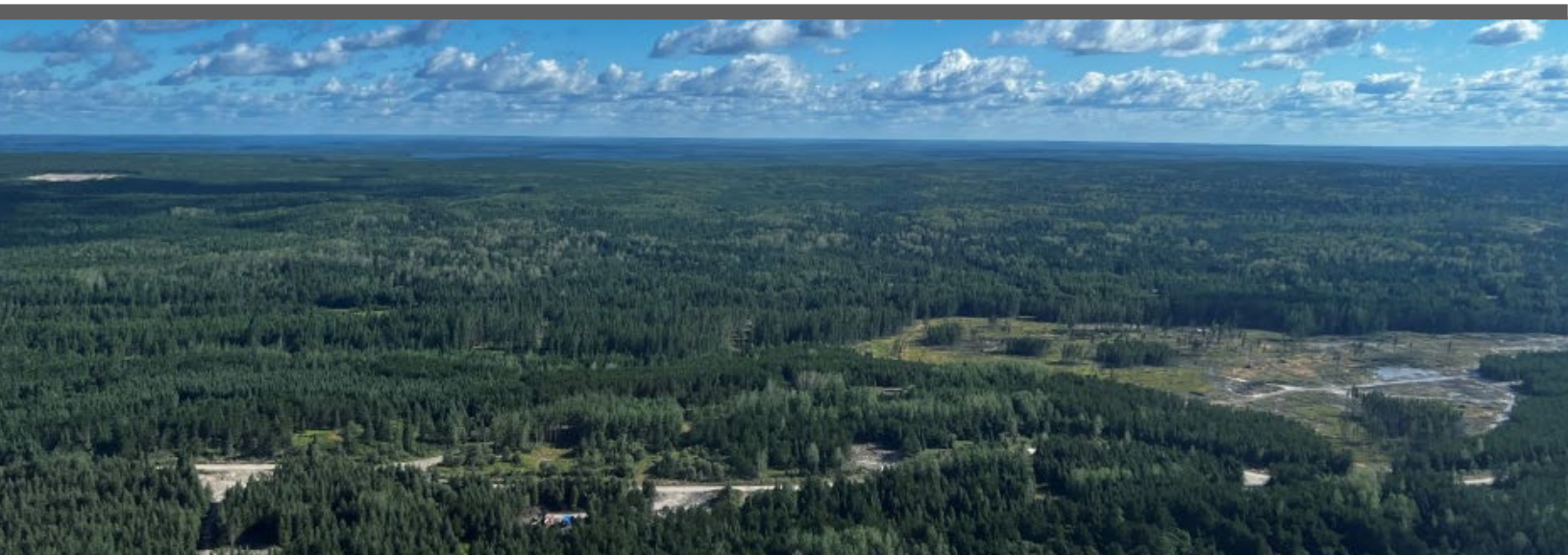
KINROSS Great Bear

Great Bear Gold Project
Impact Statement

Appendix U-2:

Draft Spill Prevention and Contingency Plan



KINROSS Great Bear

Great Bear Project (Main Mine) Spill Prevention & Contingency Plan - Draft for Impact Statement

<GTEX-AA###-###-A-####>

Dec 2025

Date	Revision	Status	Prepared by	Reviewed by	Approved by
03-Dec-25	0	<Status>			
			Hannah Hillier	Ashley Moncrief	Aaron MacDonnell

Document Review History

Revision	Date	Description	Originator

Table of Contents

RECORD OF REVISIONS

As per Sections 9(2) and 10(1) of O. Reg. 224/07, the revision history of this plan is documented herein:

Revision	Prepared by	Reason	Issue/Approved Date (mm,dd,yy)	Approved by
Rev.0	GBR	Original	TBC	Aaron MacDonnell

1 Introduction

The Great Bear Resources Ltd. (Great Bear Resources), a wholly owned subsidiary of Kinross Gold Corporation, is proposing to construct and operate an underground mine, open pits, gold process plant with associated infrastructure, approximately 25 kilometres (km) southeast of the Municipality of Red Lake (Figure 1-1) in Northwestern Ontario.

This Spill Prevention and Contingency Plan (SPCP) has been prepared to support the federal Impact Statement, aligned with the requirements of Ontario Regulation (O. Reg.) 224/07: Spill Prevention and Contingency Plans under the Ontario Environmental Protection Act. It has been developed to apply to the Great Bear Project (Project) based on the most current version of the design site plan.

The SPCP herein encompasses operations that have been identified to have potential spill risks for hazardous and non-hazardous substances stored and managed at the Project Site, depicted in Figure 1-2A, as the property boundary. The objectives of the SPCP are to identify, prevent and/or minimize significant potential spill risks, as well as prepare and respond in the event of a spill at the Project Site, with associated mitigation measures to prevent or minimize adverse effects to the natural environment and/or sensitive receptors.

Table 1-1 describes the main requirements of O. Reg. 224/07 and the associated sections in the SPCP.

O. Reg. 224/07 Section	Requirement	SPCP Section(s)
4., 1.	Identifying and contact information.	1.1, 1.2
4., 2.	Directions required to gain entry to the Site.	1.1
4., 3.	Written description of the proposed plant and operations and plans and drawings of the Site	1.3, Figures 1-1 to 1-6
5 (1) 1.	Identification of potential spills that may occur.	2.1, 2.2, Appendix C
5 (1) 2.	An analysis of the likelihood of each identified spill.	2.2, Appendix C
5 (1) 3.	For each spill, an explanation of how the conclusion relating to the likelihood of the spill was reached.	2.2, Appendix C
5 (1) 4.	A map of the area around the plant identifying sensitive receptors that are within the area that may be affected by spills from the site.	2.2.3, Figure 2-1A and 2-1B
5 (1) 5.	An analysis of the likelihood that a spill will cause an adverse effect at a place listed in S.5 (1) 4., and the extent of the adverse effect	2.2, Appendix C
5 (1) 6.	For each spill, an explanation of how the conclusions as to the likelihood and extent of the adverse effect were reached	2.2, Appendix C
5 (1) 7.	A risk assessment for each spill	2.2, Appendix C
5 (1) 8. and 9. and 5(2)	Prevention and control measures for potential spills with significant risk, including maintenance, monitoring and training.	2.3, 2.4, 3.1, Appendix C
6 (1) 1.	Plans to prevent, eliminate or ameliorate any adverse effects of a spill including acquiring spill response equipment and alarms/notification systems	3.1, 3.2, 3.6, 3.7
6 (1) 2.	Steps to monitor movement of pollutants and potential to cause adverse effects	3.8
6 (1) 3. and 4. and 6 (2)	Identification of non-reportable spills	3.3

O. Reg. 224/07 Section	Requirement	SPCP Section(s)
6 (1) 5.	Responsible persons, spill response team, roles, training, equipment/material available and inspected	1.2, 2.4, 3.1, 3.5, 4.3
6 (1) 6.	Spill response procedures and notifications	3.4, 3.6, 3.7, 3.8
6 (1) 7.	Record of spills and steps taken that is retained for 5 years	3.6, 3.7, Appendix B
7	Copies of the most recent spill prevention and contingency plans are retained at the plant.	4.1
8	Environmental Emergency Plans	The SPCP does not rely on response plans in a separate environmental emergency plan document. However, environmental emergency plans may be consulted as necessary.
9 (1) and (2)	Review of plan after a spill	4.2
10 (1) and 10 (2)	Annual review of plan, written statement and plan testing	4.2, 4.3, Appendix A
11	Distribution of plans to other parties upon request	4.1

1.1 Site Identifying Information

As per Section 4 of O. Reg. 224/07, the information below identifies the Project Site location and owners / operators for which the SPCP is applicable. Great Bear Resources Ltd. is a wholly (100%) owned subsidiary of Kinross Gold Corporation (Kinross), a Canadian-based gold and silver mining company founded in 1993, headquartered in Toronto, Ontario. Kinross acquired Great Bear Resources Ltd. and the Great Bear Property located in the Red Lake mining district of Ontario, Canada in February 2022.

The owner of this SPCP is:

Great Bear Resources Ltd.

15th Floor 25 York Street

Toronto, ON M5J 2V5

Project Authorized Contact Person:

Ashley Moncrief

104 Howey Street

Red Lake, ON, P0V 2M0

Tel: (807) 728-2445

Site Location and Entry Directions:

The Project Site is situated approximately 25 km southeast of the Municipality of Red Lake and approximately 40 km northwest of the Township of Ear Falls in northwestern Ontario. The Site is accessible from paved Highway 105 by means of an existing all-weather gravel road, known locally as Tuzyks Road.

1.2 Contact Information for Responsible Persons

As per Section 4 of O. Reg. 224/07, Table 1-2 shows the current contact information for personnel responsible for implementing the SPCP, ensuring compliance with O. Reg. 224/07, and directing spill response and emergency services.

Table 1-2: Contact Information

Name	Title	Telephone (Operating and Non-Operating Hours)	E-mail
Ian Russell	Site Manager	(807) 728-3882	Ian.Russell@kinross.com
Ashley Moncrief	Environmental Manager	(807) 728-2445	Ashley.Moncrief@kinross.com
Hannah Hillier	Senior Environmental Advisor	(807) 663-2492	Hannah.Hillier@kinross.com
Gary Maher	Health and Safety Lead	(807) 633-1098	Gary.Maher@kinross.com

1.3 Site Description

The Project Site is situated approximately 25 km southeast of the Municipality of Red Lake and approximately 40 km northwest of the Township of Ear Falls in northwestern Ontario. The Project Site is accessible from paved Highway 105 by means of an existing all-weather gravel road, known locally as Tuzyk's Road and the proposed Mine Access Road (Figure 1-2A).

The proposed site layout for the main Project Site is shown in Figure 1-2B and will involve the following major components:

- Underground mine
- Open pits (two): LP Central pit and Viggo pit
- Surface stockpiles: overburden stockpiles (OVB), mine rock stockpile (MRS), low grade ore stockpiles (LGO) and run of mine ore stockpile (ROM)
- Ore process plant
- Facilities to manage tailings from the processing of ore: tailings management facility (TMF) and Viggo management facility (VMF; after construction phase)
- Water management and treatment works
- Dedicated aggregate operations to produce aggregate for onsite use
- Other onsite buildings, facilities, areas and infrastructure.

Figures 1-2 to 1-6 show features of the Site required by Section 4.,3. Of O. Reg 224/07 and as described in Table 1-3.

Table 1-3: Figure Cross - Reference

O. Reg. 224/07 Section	Description	Figure Number
4., 3.i.	Main Project Site property boundary, SPCP boundary	Figures 1-2A and 1-2B
4., 3.ii.	Main storage, handling, processing and disposal areas	Figure 1-3
4., 3.iii	Discharge points	Figure 1-4
4., 3.iv. and v.	Works, containers or structure from which a spill may occur	Figure 1-3
4., 3.vi.	Floor drains and destination of flow	Not applicable
4., 3.vii.	Loading and unloading areas	Figure 1-4
4., 3.viii.	Sumps and discharge location	Figure 1-4
4., 3.ix.	Test holes and monitoring locations	Figure 1-5
4., 3.x.	Ground water and surface water supplies used	Figure 1-5
4., 3.xi.	Structures designed to contain spills	Figure 1-6
4., 3.xii.	Equipment for capturing and removing spilled pollutants	Figure 1-6
4., 3.xiii.	Works for collection, transmission, treatment and disposal of stormwater (tailings area)	Figure 1-6
4., 3.xiv.	Any other structure or works relevant to SPCP	Not applicable

2 Prevention Plans

2.1 Hazard Identification

As per Section 5(1)1. of the O. Reg. 224/07, Table 2-1 identifies the material storage areas where spills may be possible. The locations of these storage areas are presented on Figure 1-3.

#	Material	Area or Maximum Capacity	Storage Area or Location
1	Desulphurized Tailings	75 hectares (ha)	TMF
2	Desulphurized Tailings Supernatant	3,110,000 cubic metres (m3)	TMF Pond
2	Desulphurized Tailings Pipeline	4.3 km	Extends from the Process Plant to the TMF.
10	Concentrate Tailings	22.8 ha	East VMF
10	Concentrate Tailings Pipeline	4.1 km	Extends from the Process Plant to the East VMF
3	Mine Water	2,410,000 m3	Mine Water Pond
4, 5, 6, 7, 8	Runoff water/dust from OBV1, OBV2, OBV3, OVB4, OVB5	17.8 Mm3 total capacity	OVB1 – to the Northeast of the LP Central pit, OVB2 – Directly North of the LGO, OVB3 – East of the TMF, OVB4 – North of the TMF, OVB5 – SW of the TMF.
9	Plant Reagents	~1,000 m2 (Size of Reagent storage area)	Plant Site Reagent storage Area
11	Runoff water/dust from LGO Stockpiles	47.4 ha	LGO East of the Process Plant Site
20	Vehicle Repair/Maintenance products	~165,000 litres (L) of stored product in the Service complex.	Service and Administration Complex
13	Runoff water/dust from MRS	165 ha	MRS (PAG and NPAG material)
14	Cement	1,000 tonnes (t)	Paste Plant
14	Paste Backfill	Unknown	Pipeline extends from Paste Plant to underground workings
15	Untreated water	266,000 m3	AEX Holding Ponds and Collection Water Pond.
17	Reject Solution	0.7 Mm3	West VMF
18	Propane	10,000 L	Production Shaft
18	Propane	68,040 L	Viggo Fresh Air Raise
18	Propane	68,040 L	LP Fresh Air Raise
18	Propane	68,040 L	Discovery Fresh Air Raise
18	Propane	10,000 L	Paste Plant
18	Propane	68,040 L	Service and Administration Complex
18	Propane	68,040 L	Water Treatment Plant
18	Propane	78,040 L	Camp
19	Diesel	150,000 L	LP Central Pit
20	Diesel	11,356 L	Process Plant Site
12	Diesel	75,000 L	AEX Site
21	Diesel	10,000 L	Explosives Facility
22	Diesel	10,000 L	Quarry

#	Material	Area or Maximum Capacity	Storage Area or Location
23	Diesel	10,000 L	Borrow Source
26	Diesel	25,000 L	Emergency Generators
20	Gasoline	11,356 L	Service and Administration Building
12	Gasoline	5,000 L	AEX Site
28	Treated effluent (pipeline)	12 km	Extends from treated water pond to Chukuni River
21	Explosives	18,000 m2	Explosive Facilities
27	Domestic Sewage	114,000 L	Camp
25	WTP Reagents	5,000 m2 (approx. area of WTP building)	Water Treatment Plant
29	Natural Gas (pipeline)	860 m3	AEX Site
24	Feed Material	Quantities to vary.	Crusher – Plant Site

2.2 Risk Assessment

As per Section 5(1)2. of O. Reg. 224/07, an analysis of the likelihood and adverse effects for each of the spill hazards identified in Section 2.1 has been conducted and will be reviewed and updated, as necessary. A comprehensive risk assessment will be prepared to meet these needs, aligned with the preliminary risk assessment presented in the Impact Statement.

As defined in Section 5(1)4. of O. Reg. 224/07, Figures 2-1A and 2-1B show the closest proximity of the Project Site to locations of sensitive receptors. As per Figure 2-1A, there are no health care facilities, senior citizen residences, child care facilities and educational facilities near the Project site. Figure 2-1B shows dwellings, places of business, transportation corridors, wells and intakes for drinking water, and fish and wildlife habitat areas that are close to the Project Site. Both figures also include a table with the distances between the Project Site and the closest sensitive receptors.

2.3 Controls for Prevention of Spills

Controls for each spill type are described in the Risk Assessment (Appendix C). The Site Manager, or designate, will ensure that these controls are in place, are maintained, and are operating as planned to prevent occurrence of spills. Additional controls may be implemented in the future, as necessary, based on the information gained from spill test exercises and/or actual spill events.

2.4 Training

Employees working at the Project Site will review and/or receive training on the key elements of this document that pertain to employee responsibilities for spill prevention and response, as well as operational procedures for project management and spill prevention and response. Employees will also have the opportunity to participate in spill test exercises as appropriate, including live drills, where they will be able to practice spill response activities.

3 Response Plans

3.1 Spill Response Equipment

The Project Site will have the following spill response equipment available:

- Spill response materials and fire extinguishers will be in strategic locations / buildings on site for quick response to spills (Figure 1-6).
- A portable vacuum system will be available for cleaning up spills in ditches, ponds and sumps.
- A Spill Response Mobile Trailer stocked will response materials to immediately respond to a spill. The trailer contains the items identified in Table 3-1. Additional materials will be available in storage.

Table 3-1: Spill Response Mobile Trailer Contents

Item	Quantity
Oil only double weight absorbent pads (bags of 100 units)	100
Universal absorbent pads (bags of 100 units)	12
Chemical absorbent pads (bags of 100 units)	4
Oil booms (bags of 4 units)	24
Large pool	2
Industrial garbage bags (boxes of 50 units)	8
Tyvek suits (various sizes)	15
Neoprene gloves (various sizes)	60
Goggles	20
Peat Sorb (Bags)	30
Universal absorbent (5 gallon Pails)	30
2 horsepower Honda pump	1
Lay flat discharge hose (2 inches)	180 m
Suction hose (2 inches)	40 m
55 gallon drums with lids	15
Spade shovels	10
Square shovels	10
Drum trolley	1

Spill response materials and fire extinguishers are regularly inspected, so that they are ready to be deployed in the event of a spill. After spill response materials or fire

extinguishers are used, they are replenished with additional supplies from storage as soon as possible to be ready to respond to future spills. If additional personnel and equipment is required for spill response, qualified contractors will be hired to assist. Should a spill kit need to be replenished, the recommended contents are outlined below:

Table 3-2: Spill Kit Contents

Type of Spill Kit	Recommended Application	Required Contents
55 Gallon Universal Spill Kit	Areas with large quantities of stored fuels, oils, etc.	- (50) 15 x 19” Pads - (4) 3” x 12’ Sorbent Socks - (8) 18 x 18” Pillows - (1) pair Nitrile Gloves - (1) Emergency Handbook - (1) pair Goggles - (5) Disposal Bags
20 Gallon Universal Spill Kit	Trucks with slip tanks	- (12) 15 x 19” Pads - (3) 3” x 12’ Sorbent Socks - (2) 18 x 18” Pillows - (1) pair Nitrile Gloves - (1) Emergncy Handbook - (1) pair Goggles - (3) Disposal Bags
5 Gallon Universal Bag Spill Kit	All onsite vehicles/equipment	- (10) 15 x 19” Pads - (2) 3” x 4’ Sorbent Socks - (1) pair Nitrile Gloves - (1) Disposal Bag
20 Gallon Universal Spill Kit	Other high risk areas such as mobile pump operation, drill rigs, chemical storage areas, etc.	- (12) 15 x 19” Pads - (3) 3” x 12’ Sorbent Socks - (2) 18 x 18” Pillows - (1) pair Nitrile Gloves - (1) Emergncy Handbook - (1) pair Goggles - (3) Disposal Bags

3.2 Alarms and Notification Systems

Some processes and equipment have alarms or notification systems to inform operators of potential issues, including but not limited to the following:

- Level sensors and alarms in various mix and distribution tanks in the Plant to alert operators to turn off pumps feeding into the tank. Some tanks may also be equipped with automatic shut off valves.
- Level sensors in various water management ponds to alert operators.

- Pressure Sustaining Valve Stations along natural gas distribution corridor.
- Level switches in fresh and treated water tanks at Potable Water Plant to alert operators to close inlet valves.
- Floats to trigger high alarm levels in sumps.
- Flow alarms on pipelines.

See also Risk Assessment in Appendix C.

3.3 Non- Reportable Spills

As per Section 6(2) of O. Reg. 224/07, and in consideration of the Risk Assessment (Appendix C), the following spills at the Project Site are considered to be non-reportable under O. Reg. 224/07 and O. Reg. 675/98:

- Spills of materials at the Project Site that are wholly contained and are not impacting natural areas including waterways
- Spills that can be readily remediated through cleanup and restoration of paved, gravelled or grassed surfaces
- Spills of diesel fuel less than 100 L.

Notwithstanding the above, under O. Reg. 675/68, Section 10(3), the Environmental Manager and/or the Environmental Coordinator is responsible for reporting spills of this nature to regulatory authorities if the quantity spilled is greater than which could be contained onsite, the spill was caused deliberately, the spill causes adverse effects other than those that can be easily remediated, remediation was not carried out immediately, and/or the spill enters a waterway.

3.4 Notifications

The Environmental Manager and/or Environmental Coordinator will be notified of any spill that occurs on the Project Site, as soon as possible after occurrence or discovery, as per Environmental Procedure: Environmental Incident Management and Reporting. Spills, other than those described in Section 3.3, will be reported by the Environmental Manager and/or Environmental Coordinator to the Spills Action Center as soon as possible after discovery.

Due to remoteness, it is not anticipated that members of the public will be directly affected by a spill from the Project Site. However, if the spill has impacted or has the potential to impact a natural waterbody or a neighbouring property, the potentially affected members of the public and property owners will be notified and/or signs will be posted.

3.5 Spill Response Team

It is anticipated that most small spills can be adequately contained and remediated by one or two employees in the immediate work area. If a larger spill occurs that may impact neighbouring properties, a spill response team including the members from Table 1-2 will be established to direct the spill response. Other employees or contractors will be brought in as necessary to assist with spill containment and remediation.

3.6 General Spill Response Procedure for Low-Risk Spills

In the event of a fluid spill (i.e., fuels, oils, etc.), the Environmental Manager and/or Designate will be contacted as soon as reasonable. The following general steps will be taken to ensure proper containment and cleanup:

1. Stop related operations and ensure personnel safety.
2. Assess possible related hazards and mitigate.

3. Shut down and isolate the source of the spill to minimize impacts if safe to do so.
4. Identify the material(s) spilled and quantities.
5. Identify the potential area of impact.
6. Contain and prevent material from leading to any waterbodies or flowing downstream, if practical.
7. Take photographs and provide to the Environmental Department. The Environmental Department will determine the need for external reporting.
8. Clean up will be carried out as fit for each specific event and/or as directed by the Environmental Department.
9. Complete an internal report of all spills that includes the following information
    a. Name of person reporting the spill
    b. Date and time of spill
    c. Type of product spilled
    d. Amount of product spilled
    e. Location of spill and area of impact (land, water, air, etc.)
    f. Source of spill
    g. Type of accident and details of how it happened
    h. Status of the incident (cleaned up, being cleaned up, additional resources required)
    i. Written statements (contractor spill report / documentation)
    j. Photographs of the spill and cleanup.

As per Section 6(1)7. of O. Reg. 224/07, steps taken in response to a spill will be documented in a record that is retained at the site for a period of at least five years. Spill reports will be entered and maintained in the Survey123 database. A spill report template is available in Appendix B.

3.7 Spill Response Procedure for Potentially Significant Spills

Potentially significant spills at the Project Site include the following spills that have moderate risk ratings (with controls) in the Risk Assessment (Appendix C):

- Loss of containment of bulk diesel tanks
- Loss of containment of propane tanks
- Natural gas pipeline failure
- Loss of containment of bulk reagents from Plant and/or WTP operations
- Desulphurized tailings pipeline failure
- Tailings dam failure
- Reject solution pipeline failure
- Concentrate tailings pipeline failure
- Overtopping of VMF
- Overtopping or liner failure of contact water storage ponds (pre-treatment).

A spill response team including the members will be established to direct the spill response for any of the above spill types. Other employees and/or qualified contractors will be brought in as necessary to assist with spill containment and remediation.

The following steps will be implemented, in this order, for all significant spills after contacting the Environmental Manager and/or Designate, if reasonable (the Environmental Department will complete external reporting, including reporting to the Spills Action Center as appropriate):

1. Stop related operations and ensure personnel safety.
2. Assess all possible hazards and mitigate if safe to do so.
3. Shut down and isolate the source of the spill to minimize impacts if safe to do so. For the potentially significant spills listed above, the may involve:
    a. Triggering emergency stop buttons and disconnecting fuel tanks from any internal systems
    b. Stopping the flow of natural gas through the pipeline
    c. Stopping the flow of tailings through the pipeline
    d. Stopping the flow of contact water into water storage ponds
4. Take photographs and provide to the Environmental Department.
5. Monitor the movement of liquid spills, the extent of impact and the potential to reach sensitive environmental areas. Use booms and absorbent materials for containment. Create berms using heavy equipment as necessary to contain and prevent further impacts to the natural environment.
6. Clean up will be carried out as fit for each specific event and/or as directed by the Environmental Department.

As per Section 6(1)7. of O. Reg. 224/07, all steps taken in response to a spill must be documented in a record that is retained at the site for a period of at least five years. Spill reports will be entered and maintained in the Survey123 database. A spill report template is available in Appendix B.

3.8 Monitoring of Spills - Impacted Off-Property Areas

As per Section 6(1) 2. of O. Reg. 224/07, if a spill has impacted soil on neighbouring properties, a monitoring program will be established, involving collection of soil samples in the impacted areas to determine contaminant concentrations and the extent of contamination (i.e., area and depth). Additional samples will be collected in non-impacted areas to establish background concentrations. Soil samples will be collected in the same locations after remediation of the area to ensure that concentrations are less than or equal to background concentrations. Monitoring information will be shared with affected property owners.

If a spill is known or has potentially impacted a natural waterbody, a water quality monitoring program will be established, involving collection of water samples in the impacted areas to determine contaminant concentrations in the water column. These will be compared to historical concentrations of those parameters, if available, to determine if water quality has been impacted. A site-specific water sampling program will be developed, in consultation with relevant regulatory agencies, following collection of the initial samples to determine the frequency of further sampling required. If the spill contains solids, sediment sampling may also be required.

4 Distribution, Review and Testing of the Plan

4.1 Plan Distribution

As per Sections 10(1)7. and 10(2)4. of O. Reg. 224/07, this document is reviewed by all employees and contractors that carry out activities on the Project Site and may be involved with any activity that can cause a spill. The SPCP is accessible to all personnel and contactors. A copy of the current version of this SPCP is retained electronically and a hard copy of the SPCP is retained at the onsite main office trailer.

As per Section 11 of O. Reg. 224/07, upon request, a written summary of the SPCP and any updates will be provided to a municipal emergency control group, a municipal by-law inspector, the local fire department, the local police department, the local medical officer of health or an Environment and Climate Change Canada Environmental Emergencies Officer.

4.2 Plan Review and Revision

As per Sections 9(1), 9(2) and 10(1) of the O. Reg. 224/07, this plan will be reviewed at least annually and after each spill that is reportable under section 92 of the Environmental Protection Act. It is the responsibility of the Environmental Manager and/or Environmental Coordinator to ensure that the risk assessment and spill prevention and response plans are adequate and current for Project Site.

A review of this SPCP will be completed by the Environmental Manager and/or Environmental Coordinator if a spill occurs for which notification is required under Section 92 of the Environmental Protection Act, including the following:

- Review of the risk assessment for the type of spill that occurred to ensure that the likelihood and adverse effects classifications, risk rankings and controls are accurate; and
- Review and revision (if necessary) of the prevention and reponse plans to prevent recurrence or reduce adverse effects of a similar spill in the future.

4.2.1 Statement of Accuracy and Effectiveness

As per Sections 10(1)7. and 10(2) of O. Reg. 224/07, the Site Manager (Officer of the Company) will complete and sign a written statement of accuracy and effectiveness annually at the beginning of each calendar year. Appendix A contains a template for the written statement. A copy of the signed statements will be retained on the Project Site for at least five years.

4.3 Plan Testing

As per Section 10(1), a portion of the Project Site operations will be tested annually in a tabletop or live exercise to determine whether spill response would comply with the SPCP and would be effective to prevent, eliminate or ameliorate adverse effects from the spill. Spill exercises will test a different portion of the operations each year, with the goal of testing all portions of the operations within a five-year period. At least once every two years, a live spill exercise will be conducted where every person and every operation involved in the spill is physically tested.

All exercises will be documented in a written report. Any inadequacies identified in the exercises will be addressed. This may include revisions to the SPCP or other operational procedures and practices.

Table 4-1: Five Year Spill Test Plan, 2029 to 2033

Year	Test Type	Portion of the Environment	Portion of Operation	Substance	Spill Scenario
2029	Tabletop	Soil	Fuel and Chemical Management	Diesel Fuel	Spill to ground from bulk diesel tank
				Sodium Hydroxide (50%)	Spill to ground from tank failure exiting Process Plant.
2030	Live Drill	Natural Terrestrial / Aquatic Areas	TMF	Tailings	Dam breach
2031	Tabletop	Air	Energy Sources	Propane	Loss of containment of propane tank
			Feed Handling	ROM stockpile	Large fugitive dust event due to high winds
2032	Live Drill	Natural Terrestrial / Aquatic Areas	Effluent Treatment	Effluent	Failure of treated effluent pipeline to Chukuni River
2033	Tabletop	Natural Terrestrial / Aquatic Areas	Ore and mine rock storage	Contact water from ore stockpile and PAG stockpile	High precipitation event triggering excessive potentially acidic runoff