

ENVIRONMENTAL MANAGEMENT PLAN

**DEWAR LAKES CAMP
QIKIQTANI REGION, NUNAVUT, CANADA**



Prepared by:



Effective Date: July 1, 2022

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1 Introduction

This Environmental Management Plan (EMP) applies to activities carried out at the Commander Resources Ltd. (Commander or the Company) Dewar Lakes Camp (the Camp), Nunavut, Canada.

This EMP will come into effect July 1, 2022, pending approval. Copies and updates to this plan may be obtained via the Company or APEX Geoscience Ltd. (APEX).

1.1 Contact Details

Commander Resources Ltd.

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Vancouver, BC V6E 3V6

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Fax: (604) 484-7143

info@commanderresources.com

www.commanderresources.com

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100, 11450-160 Street NW
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1.2 Purpose and Scope

The purpose of the Dewar Lakes Camp Environmental Management Plan is to outline the companies' environmental policy, and to address environmental issues related to use of the Dewar Lakes Camp. The plan includes the following:

- A summary of regulatory requirements.
- An overview of Dewar Lakes Camp environmental protection measures.
- A discussion of stakeholder issues, including procedures for dealing with anthropological or archaeological sites.
- Possible disturbances to land, flora, and fauna related to camp activities.
- Wildlife management practices and appropriate use of firearms.
- Hazardous material handling and waste management practices.
- A summary of abandonment and restoration plans.

Emergency response guidelines are beyond the scope of this plan. In the event of an environmental emergency, personnel will defer to the "Dewar Lakes Camp Emergency Response Plan" and "Dewar Lakes Camp Spill Prevention and Response Plan" for guidance.

1.3 Environmental Policy

Commander Resources Ltd. is firmly committed to the protection and conservation of the natural environment, and to ensuring the health and safety of all employees, contractors, and people in surrounding communities. The environmental policy for the Dewar Lakes Camp is to:

- Manage the Camp in a socially and environmentally responsible manner.
- Fully comply with all applicable environmental legislation and regulations.

- Work in cooperation with federal, territorial, and local governments, as well as other relevant regulatory bodies, and the general public, on all aspects of environmental protection and policy.
- Assess and mitigate any potential environmental impacts and minimize risks to the health and safety of all employees, contractors, and the general public.
- Ensure contractors operate according to the Dewar Lakes Camp environmental policies and procedures.
- Employ an emergency response plan to reduce impacts of unforeseen events.
- Provide ongoing instruction on Dewar Lakes Camp environmental policies and spill prevention and response plans for all employees and contractors.
- Keep employees, contractors, inspectors, government, and regulatory bodies informed of any changes at the site or with Camp activities.

1.4 Other Plans

The EMP should be considered as a part of the Dewar Lakes Camp management system. Other management plans in place at the Dewar Lakes Camp include:

- Abandonment and Restoration Plan (ARP)
- Emergency Response Plan (ERP)
- Fuel Management Plan (FMP)
- Spill Prevention and Response Plan (SPRP)
- Waste Management Plan (WMP)

1.5 Camp Description and History

The Dewar Lakes Camp has been used as a base location to conduct mineral exploration work on Baffin Island since 2003. Camp activities were most recently conducted under the authorization of Crown Indigenous Relations and Northern Affairs Canada (CIRNAC) Land Use Permit N2017J0014 (Expires July 4, 2022) and Nunavut Water Board (NWB) Water Licence 2BE-NAD1722 (Expires July 17, 2022) both issued to Commander Resources Ltd. (Commander). Commander is requesting to renew Land Use Permit N2017J0014 for an additional 2 years and Water Licence 2BE-NAD1722 for an additional 5 years to support work activities at the existing Dewar Lakes Camp.

The Camp is located on Crown Land beside Dewar Lakes, adjacent to the North Warning System Fox-3 airstrip in the Qikiqtani Region of Nunavut. The approximate location of the Camp is 68°37'59" N and 71°6'38" W (or 414199E/7614919N UTM Nad83 Zone 19) and is located within the 1:50,000 National Topographic System (NTS) map sheet 27B12.

The Camp consists of accommodations for up to 40 persons with a dry, large cook tent, generator shack, tool shed, incinerator, core shack, latrine with pacto toilets and a metal silo structure used for storage. At the end of the 2018 program, the Dewar Lakes Camp fuel cache contained 6 drums of jet fuel and 5 propane cylinders. 50 empty drums remain on site for removal during the next field program.

The Camp was used by Commander as an operating base to support exploration activities from 2003 to 2011. The Camp was unoccupied from 2012 to 2016, other than in 2013 when Biogenie personnel, on behalf of Commander, were onsite to clean up and secure the Camp after an episode of vandalism damaged structures. The Camp was utilized by ValOre Metals Corp. (ValOre, formerly Kivalliq Energy Corp.) in 2017 and 2018 to support mineral exploration activities at their Baffin Gold Project.

Exploration activities supported by the Dewar lakes camp are authorized under separate permits and licenses held by Commander or an assignee (currently ValOre). It is anticipated that the Dewar Lakes Camp will support ongoing exploration activities for the next several years.

A figure illustrating the Dewar Lakes Camp location is located in Appendix 1.

2 Applicable Legislation and Guidelines

Acts, regulations, and guidelines that relate to environmental management in Nunavut include, but are not limited to:

2.1 Federal

- Canadian Environmental Protection Act
- Environment Canada's Environmental Emergency (E2) Regulations
- Implementation Guidelines for the Environmental Emergency Regulations
- Canadian Standards Association (CSA) Z1600-14 - Emergency and continuity management program
- Canada Wildlife Act
- Fisheries Act
- Migratory Birds Convention Act
- Nunavut Waters and Nunavut Surface Rights Tribunal Act
- Transportation of Dangerous Goods Act
- Transportation of Dangerous Good Regulations
- Public Health Act
- Species at Risk Act
- Territorial Lands Act
- Nunavut Land Claims Agreement
- Department of Fisheries and Oceans Canada Operational Statements
- Guidelines for Spill Contingency Planning

2.2 Territorial

- Nunavut Environmental Protection Act
- Nunavut Wildlife Act
- Caribou Protection Plan / Caribou Protection Measures
- Environmental Guideline for the Burning and Incineration of Solid Waste
- Guideline for Industrial Waste Discharges in Nunavut
- Environmental Protection Act

- Environmental Guideline for the General Management of Hazardous Waste

3 Environmental Protection Measures

Activities at the Dewar Lakes Camp will be assessed for environmental impact risks and every measure available will be taken to ensure the protection and preservation of the natural environment. For the duration of the Camp use, all activities will be documented and sites photographed to comply with environmental due diligence. All on-site employees and contractors will be provided with environmental training, and will become familiar with relevant regulations. The Project Supervisor will be responsible for implementing environmental policies and training, and managing the environmental monitoring program.

Environmental training, monitoring, reclamation, and site clearance surveys will be built into the program budget to ensure adequate resources are being allocated to environmental management. Preference will be given to contractors with high standards of environmental stewardship, and who have a proven track record of sound environmental practice.

4 Stakeholders

Stakeholders may be individuals or groups concerned with, or affected by, activities at the Dewar Lakes Camp. Stakeholders will be identified and consulted with for the duration the camp is in use. Approvals will be sought from stakeholders and regulatory bodies pertaining to relevant environmental, social, and cultural issues. Prior to any large scale expansion of the Camp, Commander will conduct community consultations in order to incorporate any Inuit Qaujimajatuqangit into the planning and design and to address any outstanding issues or concerns.

In addition to consulting with community members, whenever possible, Commander will attempt to hire local residents to assist in many aspects of the project such: as wildlife and environmental monitors, camp management assistants, core cutting/processing technicians and geo-technical assistants to not only utilize their skilled labor, but extensive knowledge of the land and wildlife.

4.1 Archaeological or Paleontological Sites

There is a potential for discovery of previously unknown archaeological or paleontological sites near the Dewar Lakes Camp.

Actions will be taken to ensure that any known or undocumented archaeological or palaeontological sites or artifacts are not disturbed. These include, but are not limited to:

- No company staff, contractors or site visitors will operate any vehicle over a known or suspected archaeological or palaeontological site.
- No company staff, contractors or site visitors will remove, disturb, or displace any archaeological artifact or site, or any fossil or palaeontological site.

- The company will immediately contact the Government of Nunavut Department of Culture and Heritage (CH) at (867) 934-2046 or (867) 975-5500 should an archaeological site or specimen, or a palaeontological site or fossil, be encountered or disturbed. A report will be prepared documenting the discovery and sent to CH and CIRNAC. Reports will include GPS coordinates, a brief description of the site and/or artifact and photos.
- Company staff, contractors or site visitors will immediately cease any activity that may disturb an archaeological or palaeontological site if encountered until permitted to proceed with the authorization of CH.
- Company staff, contractors or site visitors will follow the direction of CH in restoring disturbed archaeological or palaeontological sites to an acceptable condition. If these conditions are attached to either a Class A or B Permit under the Territorial Lands Act CIRNAC's directions will also be followed.
- Company staff, contractors or site visitors will provide all information requested by CH concerning all archaeological sites or artifacts and all palaeontological sites and fossils encountered.
- Before commencing any work where ground disturbance may occur, the area will be surveyed for any archaeological or paleontological sites.
- Building of inuksuk is prohibited.
- Commander will ensure that all persons working under its authority are aware of these conditions concerning archaeological sites and artifacts and palaeontological sites and fossils.

Nunavut Department of Culture and Heritage:

Phone: 867-975-5500

Fax: 867-975-5504

CIRNAC Field Operations Manager:

Phone: 867-975-4295

Fax: 867-979-6445

5 Identification of Potential Impacts and Proposed Mitigation Measures

5.1 Designated Environmental and Socio-Economic Areas

The Dewar Lakes Camp is not located within any federal or territorial Protected Areas, as defined by Environment and Climate Change Canada. The nearest National Park to the Camp is the Auyuittuq National Park of Canada, located 140 km to the southeast. A Territorial Park is proposed approximately 100 km to the north of the Camp, near Clyde River. Another protected area near the Camp is the Ninginganiq National Wildlife Area, located approximately 150 km to the northeast.

As defined by the Draft Nunavut Land Use Plan, the Dewar Lakes Camp is located in an area which is considered to contain Valued Socio-Economic Components, in this case the area has a high mineral potential. The Camp is also identified to be located in an Area of Traditional Land Use.

5.2 Wildlife Disturbance Mitigation

5.2.1 Wildlife and Habitat

All interaction with wildlife is discouraged; however, employees and contractors will be trained in the appropriate actions to take if wildlife are encountered in Camp. Intentionally approaching, disturbing, or feeding wildlife is strictly prohibited. Any incidents will be thoroughly investigated and disciplined. All wildlife, and their dwelling sites, will be respected and efforts will be made to avoid them. All personnel will be required to record any wildlife sightings.

Animal sightings will be recorded in the “Wildlife Observation Log” and reported as part of the “Wildlife and Environment” section of the Dewar Lakes Camp Annual Report. If any wildlife passes near the Dewar Lakes Camp, protection measures will be followed and operations may be halted until the animal has moved out of the vicinity. Any bears or nuisance wildlife will be immediately reported to the project supervisor, CIRNAC and the Government of Nunavut Department of Environment (GN-DoE). Emergency Wildlife Contacts are listed in Table 5.1.

Table 5.1. Wildlife Emergency Contacts

Organization	Title	Contact	Location	Telephone Number
Nunavut Department of Environment	Director – Wildlife Research	Drikus Gissing	Iqaluit	(867) 975-7790
Nunavut Department of Environment	Manager – Wildlife Research	Caryn Smith	Iqaluit	(867) 975-7756
Nunavut Department of Environment	Kivalliq Regional Wildlife Biologist	Mitch Campbell	Arviat	(867) 857-3171
Nunavut Department of Environment	Wildlife Biologist II- Carnivores	Malik Awan	Arviat	(867) 857-3198
Nunavut Department of Environment	Conservation Officer II	Peter Kattegatsiak	Chesterfield Inlet	(867) 898-9130
Nunavut Department of Environment	Conservation Officer III	Johanne Coutu-Autut	Rankin Inlet	(867) 645-8084
Nunavut Department of Environment	Conservation Officer II	Daniel Kaludjak	Rankin Inlet	(867) 645-8083
Nattivak Hunters & Trappers Organization			Qikiqtarjuaq	(867) 927-8836
Clyde River Hunters & Trappers Organization			Clyde River	(867) 924-6202

The majority of activities at the Dewar Lakes Camp are very low impact, but there is still a potential for environmental issues, such as a fuel or oil spill. Policies and procedures outlined in the “Dewar Lakes Camp Fuel Management Plan” and “Dewar Lakes Camp Spill Prevention and Response Plan” will be followed at all times to mitigate the chance of a spill.

Aircraft support is required to carry out operations at the Dewar Lakes Camp. Helicopter support will be required for daily operations including pick up/drop off of field personnel and fuel moves. Possible impacts that may arise from the use of aircraft include fuel spills,

and noise disturbance. When low altitude flights are necessary, such as deploying field personnel, all efforts will be taken to avoid wildlife, dwellings, and nests. Pilots will be instructed not to land where wildlife is present unless it is an emergency situation. If a landing occurs for any reason in the presence of wildlife, it will be documented and submitted as part of the “Wildlife and Environment” section of the Dewar Lakes Camp Annual Report.

Appropriate screens will be placed over all water intakes in order to reduce the potential for fish entrapment.

5.2.2 Caribou Mitigation and Monitoring

Commander Resources Ltd. recognizes special consideration is required with respect to Caribou and the following measures will be strictly followed to mitigate potential impacts on Caribou.

All Commander employees, contractors and visitors will be instructed and must strictly adhere to the following:

- Caribou avoidance will always be the priority mitigation measure.
- Local community members will be employed as wildlife monitors.
- All sightings of caribou will be reported to the Project Supervisor, included in the report will be the number of caribou and distance from the Camp, their approximate numbers, direction of movement and general behaviour.
- Wildlife reports, containing information on sightings and interactions of all wildlife, denning sites, raptor nests and any work suspensions will be submitted annually to regulators.
- In the event caribou cows calve in proximity to the Camp (i.e. 10 km radius) operations will be suspended (e.g. helicopter flights, core cutting, snowmobile and ATV use, etc.) until caribou have moved out of the 10 km radius.
- Flights lower than 300 m above ground level (e.g. deploying field personnel) will be suspended (if safe to do so) in the presence of caribou cows and calves.
- Camp activities (e.g. helicopter flights, core cutting, snowmobile and ATV use, etc.) will be suspended if concentrations of caribou (50 or more) approach within 2 km of the camp. Activities will not resume until all of the caribou have moved out of the area.
- Absolutely no activities will be conducted that will interfere with caribou cows and calves or migrating caribou.
- Commander will communicate with the local hunters and trappers organizations and any other interested parties regarding caribou sightings and appraised movements in the area.

5.2.3 Species at Risk

- Commander recognizes that with any remote activities, there is a potential to negatively affect wildlife, and of greatest concern, affect species at risk. Although all wildlife will be protected and treated with respect during all activities at the Dewar Lakes Camp, special consideration will be given to the species identified below. All

observations of wildlife will be recorded and submitted annually and any human-wildlife interaction will be reported immediately.

Peregrine Falcon, anatum/tundrius complex, Red-necked Phalarope and Short-eared owl– Special Concern (SARA)

- Raptor, Red-necked Phalarope and Owl nests, as well as all birds, their nests and eggs will always be avoided during exploration activities.
- Any observed nests will be recorded and included in the wildlife record submitted annually
- All staff, contractors and project visitors will be trained to never approach or disturb nests
- All staff, contractors and project visitors will be trained on how to identify Red-necked Phalarope nests via descriptions provided by Environment Canada and photos.
- Excessive hovering or circling over areas likely to have birds will be avoided
- Any nest found will be recorded, photographed and reported to the Gov-NU Ecosystems Biologist. In the case of the Red-necked Phalarope, Environment Canada will be notified as well.
- The Gov-NU Ecosystems Biologist will be asked to advise on the establishment of an appropriate buffer zone, determined by the species and the surrounding habitat, to protect it until the young have naturally left the nest.

Grizzly Bear, Wolverine and Transverse Lady Beetle – Special concern (COSEWIC)

- All Commander staff, contractors and visitors to the Camp will be properly trained in wildlife disturbance mitigation, including deterrent and interaction measures
- Proper measures will be taken in Camp to reduce the attraction of wildlife including proper storage and handling of food and waste
- All bears, wolverines and other wildlife, as well as their dens, will be avoided at all times
- Any observations of bears, wolverines or Transverse Lady Beetle will be recorded and submitted with the annual report and any human-wildlife interaction will be reported immediately.

5.2.4 Migratory Birds

Commander has implemented the following mitigation measures to prevent potential impacts on migratory birds. All employees, contractors and site visitors will be instructed and must strictly adhere to the following:

- All staff, contractors and site visitors will be educated in, and comply, with all applicable legislation and regulations.
- All wildlife, including birds and their dens and nests will be respected
- Approaching any wildlife, including birds or nests will be strictly prohibited.
- Never destroy nests or eggs of any birds.

- Avoid disturbing nests and known concentrations of birds by maintaining a 1.5 km buffer when in transit by aircraft.
- Avoid approaching known nest while on foot.
- Attempt to prevent birds from nesting on man-made structures.
- Minimize flights during migration, nesting and moulting.
- Avoid areas used by flocks of migrating waterfowl by 3 km.
- Avoid excessive hovering or circling over areas likely to have birds.
- No depositing substances harmful to migratory birds into waters.
- Migratory bird observations will be included in the Wildlife Observation logs and submitted with the annual report
- Any inadvertent disruption of migratory birds, nests or eggs will be immediately reported.
- Special care and concern, including monitoring will take place during migratory bird nesting periods in the area (mid-May – mid-August).
- Any nest found will be recorded, photographed and reported to the Gov-NU Ecosystems Biologist. The government biologist will be asked to advise on the establishment of an appropriate buffer zone, determined by the species and the surrounding habitat, to protect it until the young have naturally left the nest.
- Commander understands that there is risk that migratory birds, their nests or eggs can be inadvertently harmed or disturbed as a result of remote activities and will take every effort to reduce the chances of incidental take. Appropriate mitigation measures will be utilized and compliance enforced with strict penalties for those who do not adhere to the proper operating procedures including, but not limited, to termination of employment.

5.2.5 Firearms

Registered 12-gauge shotguns will be located in camp to ensure the safety of all personnel on the Property. 12 gauge shotguns are the preferred firearm to be used for the purposes of bear deterrence as they are capable of firing non-lethal deterrents and lethal rounds. All firearms in camp will be stored unloaded and be regulated by the Project Supervisor. Firearms at drill sites will be stored unloaded in gun cases.

All persons carrying or handling a firearm must have a valid Firearms License and be approved by the Project Supervisor. Hunting is strictly prohibited for all employees and contractors, and will result in immediate termination and potential charges for any territorial hunting violations. Firearms discharge of any kind must be reported immediately to the Project Supervisor. Use of firearms against nuisance or aggressive wildlife is considered only as a last resort. Non-lethal deterrents will always be used whenever possible to deter problem wildlife with lethal rounds only being used in defense of life or property.

5.3 Vegetation, Soil and Permafrost Disturbance Mitigation

Vegetation at and around the Dewar Lakes Camp consists mainly of moss, lichens, stunted plants and Arctic grasses. The grasses are typically observed growing at lower elevations in areas associated with river drainage basins.

Vegetation and permafrost can potentially be impacted by camp activities. Mitigation measures to reduce the impact include limiting the amount of vegetation disruption to ensure proper shade coverage and reduction in the potential for ground thaw and subsidence. Footpaths can be marked using stakes and flagging tape to ensure that impacts to vegetation are confined to a small area or boardwalks can be built between camp buildings to reduce damage to vegetation on high-traffic footpaths. Areas that have patterned ground, clay-rich soil and or wetlands will be avoided. Heat radiating from camp buildings may thaw permafrost, so all heated camp structures will be slightly elevated above the ground to allow air circulation. Earth may be required to be moved in order to construct sumps; however natural depressions and areas free of vegetation will be used whenever possible. Any topsoil moved will be collected to use in re-vegetation efforts. If a sump is excavated, it will be barricaded until it can be back-filled.

Soil quality can be impacted from spills of fuel and other materials and waste discharge. Preventative measures include appropriate and approved storage locations and containers with secondary containment. All fuel and hazardous materials will be a minimum 31 metres away from any watercourses. Refueling will be done with precision and appropriate due-diligence will be taken. Drums and hoses will be inspected regularly for leaks and pans or absorbent pads will be placed below fuel transfer areas and stationary machinery. See the “Dewar Lakes Camp Spill and Response Plan” attached for more information.

5.4 Air and Noise Quality

Impacts on air quality can result from discharge of exhaust from airplanes, helicopters and diesel generators, as well as emissions from incineration. Given the remote location with lack of air quality issues which currently exists in the Camp location, the short duration and small scope of activities are not expected to result in any measurable air quality impacts. An Environment Canada approved batch waste, controlled air, dual chamber incinerator will be used to incinerate combustible waste, therefore reducing harmful emissions.

Noise can result from the use of planes, helicopters and to a lesser degree from activities within the Camp, which can disturb wildlife. Mitigation measure include, but not be limited to: helicopter avoidance of any raptor nests, bear dens and wolf dens, waterfowl and shorebird staging areas during critical seasons and near large mammals. In addition, Camp activities and associated work will cease if caribou cows and/or calves appear nearby.

6 Hazardous Materials

All hazardous materials will be handled and stored in accordance with the “Dewar Lakes Camp Fuel Management Plan” and “Dewar Lakes Camp Spill Prevention and Response Plan”. Fuels and other hazardous materials will be stored within “Arctic Insta-Berms”, or similar products, for secondary containment. Hazardous material storage sites will be located a minimum of 31 metres from the normal high water mark of any water body. Electric or hand wobble pumps equipped with filtration devices will be used for the transfer of diesel, jet fuel, and gasoline from their storage containers directly to their end-use fuel

tanks. Portable drip trays or mini-berms will be used to mitigate the risk of any spillage, and fully stocked spill kits will be available at all refueling stations and at various locations throughout Camp.

All hazardous materials will be clearly labeled in accordance with the Workplace Hazardous Materials Information System (WHMIS) and other applicable legislation. Labels will include, but not limited to, the type of fuel, safe handling procedures, reference to Material Safety Data Sheets (MSDS), company name, and the date of delivery to site. Signs with the same information, along with MSDS for each fuel type will be posted at each hazardous material storage or transfer site. “No Smoking” signs will be posted at each fuel cache and fuel transfer area.

All personnel required to handle hazardous materials will be trained in WHMIS, the Transportation of Dangerous Goods Act, the “Dewar Lakes Camp Spill Prevention and Response Plan” and “Dewar Lakes Camp Emergency Response Plan”. Contacts for Hazardous Waste Issues are listed in Table 6.1.

Table 6.1. Hazardous Waste Contacts

Environmental Protection Division Nunavut Department of Environment Inuksugait Plaza, P.O. Box 1000, Stn. 1300 Iqaluit, NU X0A 0H0 Tel: 867-975-7700 Fax: 867-975-7742 Email: environment@gov.nu.ca	Dr. Michael Patterson Office of Chief Medical Officer of Health Nunavut Department of Health P.O. Box 1000, Stn. 1000 Iqaluit, NU X0A 0H0 Tel: 867-975-5760 Email: MPatterson@gov.nu.ca
Workers Safety and Compensation Commission Qamutiq Building, 2 nd Floor 611 Queen Elizabeth Way, Box 669 Iqaluit, NU x0A 0H0 Tel: 867-979-8500 Fax: 867-979-8501	NU-NT 24 Hour Spill Report Line Tel: 867-920-8130 Fax: 867-873-6924 Email: spills@gov.nt.ca
Nunavut Department of Community and Government Services W.G. Brown Building, 4 th Floor P.O. Box 1000, Stn. 700 Iqaluit, NU X0A 0H0 Tel: 867-975-5400/5413 Fax: 867-975-5305	Nunavut Emergency Management Emergency 24 Hour Headquarters: 867-979-6262 / 1-800-693-1666 Qikiqtaaluk: 1-888-624-4043
	Fire Marshall Safety Services Nunavut Department of Community and Government Services Tel: 867-975-5310
Emergency Measures 24 Hour TOLL Free 1-800-693-1666 Emergency Services Response 24 Hours 867-979-6262	

7 Waste Management Planning

All wastes will be handled and disposed of in accordance with the “Dewar Lakes Camp Waste Management Plan” and will comply with federal and territorial legislation. Waste management operations at the Dewar Lakes Camp comprise a number of activities with the common goal of reducing the amount of waste generated on site and to ensure that any wastes created are reused, recycled, or disposed of in a responsible manner. Wastes will be separated at the source into a number of categories including: materials for incineration, inert recyclables, inert non-combustible materials, and hazardous materials.

When required, combustible waste will be incinerated in a batch feed dual-chamber controlled air incinerator, in accordance with the *Environmental Guideline for the Burning and Incineration of Solid Waste* by the Nunavut Department of Environment and the *Canada-Wide Standards (CWS) for Dioxins and Furans* by the Canadian Council of Ministers of the Environment. All attempts will be made to reduce the moisture content of waste to be incinerated, which will decrease the amount of smoke produced and increase the completeness of combustion. All waste will be covered and stored inside sheds or other secure buildings to keep rain and snow out of the waste and reduce the attraction for wildlife. If wet waste must be burned, such as organic (food) waste, the wet waste will be mixed with dry waste to reduce the overall moisture content of the batch.

All inert materials that cannot be incinerated will be placed in appropriate sealed containers and removed from site for reuse, recycling or proper disposal at an accredited facility.

All hazardous wastes will be sealed in appropriate containers, labeled, documented and removed from site for proper disposal at a licensed disposal facility. A waste manifest will accompany hazardous waste in transit and all parties involved will be properly accredited.

Camp greywater will be stored and treated in an excavated sump, which will allow for slow infiltration into the soil and will be located at least 31 m away from a water body. If available, coarse gravel will be placed in the bottom of the sump to provide filtration, and supports will be built on the sides to prevent slumping. Filters will be installed on kitchen drains to ensure solid food wastes do not enter the sumps and have the potential to attract wildlife. The sump will maintain a minimum 1 metre freeboard at all times. The sump and pipe will be inspected at regular intervals for leaks or overflow. When full, greywater sumps will be covered with enough material to allow for future ground settlement.

8 Abandonment and Restoration

Prior to land use permit, claim or lease termination, all structures, equipment, supplies, fuel, and wastes will be removed from the Camp with the exception of core box stacks, which will be permanently secured on site. Materials of value will be salvaged. Local businesses and residents will have the opportunity to acquire any remaining materials that will otherwise be disposed of. Any contaminated areas around the camp that may have gone unnoticed will be treated as per the “Dewar Lakes Camp Spill Prevention and Response Plan.” A thorough inspection of all areas of activity will be conducted, and photographs will be taken to include in the final reports submitted to the Water Resource

Inspector and as part of the Annual Report. All relevant regulatory agencies will be notified once the final clean-up has concluded.

Any wooden floors will be burned in accordance with the Nunavut Environmental Guideline for the Burning and Incineration of Solid Waste. The open burning of structures will only occur after approval from CIRNAC and NWB. A request letter will be submitted to the regulating authorities, which will include the characteristic and volume of material to be burned.

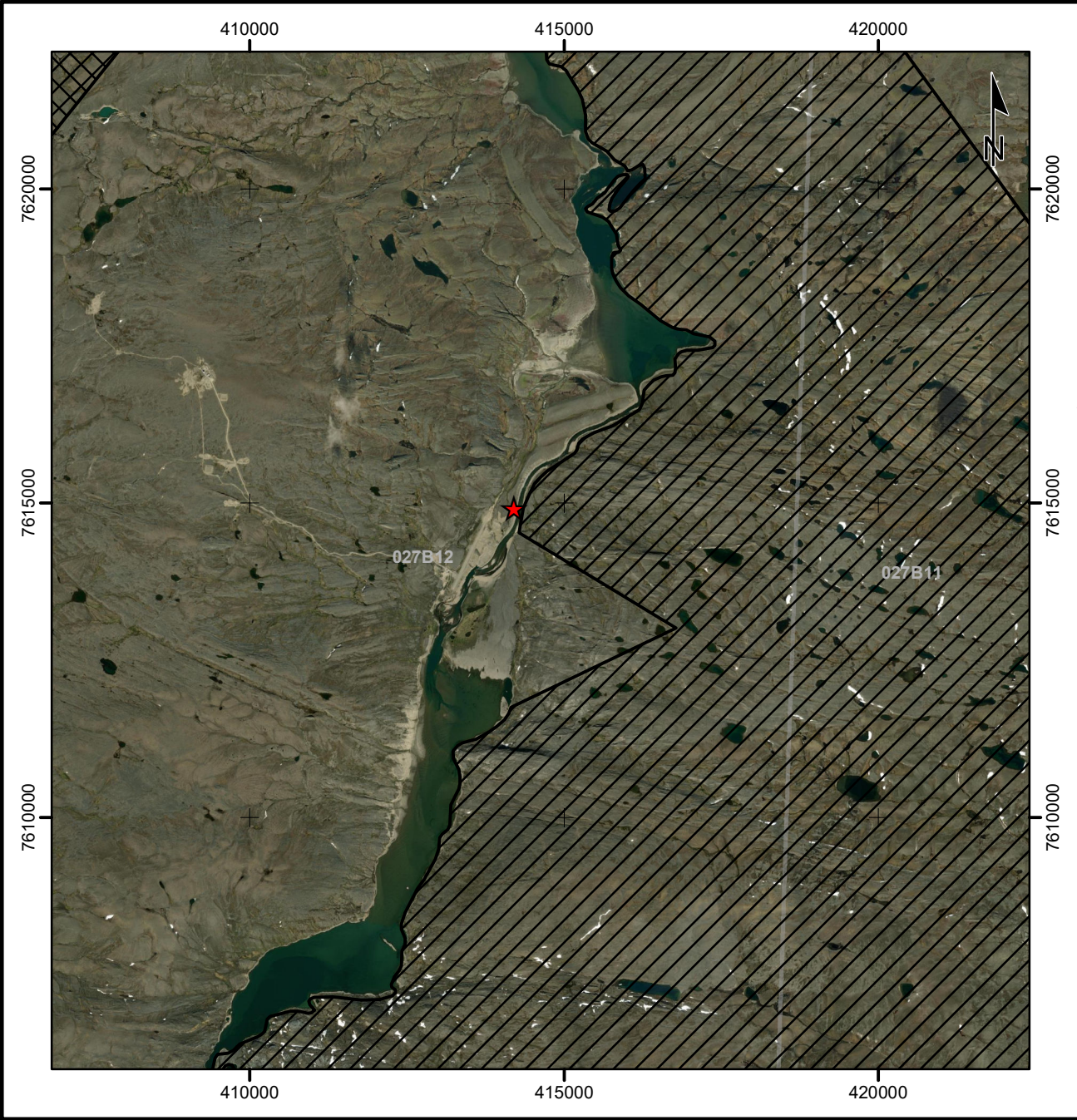
Areas disturbed by activities related to activities at the Dewar Lakes Camp will be fertilized, as per recommendation by the Inspector, to encourage re-vegetation. Any eroded or washed out areas will be filled and re-contoured to natural levels.

After site reclamation is complete, annual monitoring may occur. The monitoring may include soil and water testing, measuring and documenting plant re-growth, examining potential run off and erosion problems, and checking the stability and condition of core racks and boxes. Reports, including photographs, will be submitted to all appropriate regulatory bodies.

Further details on abandonment and restoration can be found in the “Dewar Lakes Camp Abandonment and Restoration Plan.”

Appendix 1

Figures



Legend

- Dewar Lakes Camp Location
- Inuit Owned Land**
 - Surface Parcel
 - Subsurface Parcel
 - 1:50,000 NTS Mapsheet Index

An inset map of Baffin Island, Nunavut, Canada, showing the location of the Dewar Lakes Camp. The map includes labels for various locations: Arctic Bay, Pond Inlet, Clyde River, Igloolik, Hall Beach, Nauyasat, Coral Harbour, Cape Dorset, Iqaluit, Kimmirut, Pangnirtung, and Qikiqtarjuaq. The Dewar Lakes Camp is marked with a red star. The map includes a scale bar (0 to 200 Km) and a north arrow.

COMMANDER RESOURCES LTD.

Baffin Island, Nunavut, Canada

Dewar Lakes Camp Location

0 1 2 Km
1:100,000
Nad 83 Zone 19
APEX Geoscience Ltd.

Edmonton, AB June 2022