



GIL PROJECT

RECLAMATION AND CLOSURE PLAN

Prepared By:

Fairbanks Gold Mining, Inc.
(a subsidiary of Kinross Gold Corporation)
PO Box 73726
Fairbanks, Alaska 99707-3726

April 2026

GIL PROJECT

RECLAMATION AND CLOSURE PLAN

Submitted to:

Alaska Department of Natural Resources
Division of Mining, Land and Water
3700 Airport Way
Fairbanks, Alaska 99709

Alaska Department of Environmental Conservation
Division of Water
610 University Avenue
Fairbanks, Alaska 99709-3643

Department of the Army
U.S. Army Corps of Engineers, Alaska District Regulatory Division
2175 University Avenue, Suite #201E
Fairbanks, Alaska 99709

Submitted by:

Fairbanks Gold Mining, Inc.
A Subsidiary of Kinross Gold Corporation
PO Box 73726
Fairbanks, Alaska 99707-3726

April 2026

CONTENTS

1	INTRODUCTION	1
1.1	Purpose	1
1.2	Applicant Information	1
1.3	Location and Land Status	2
2	PROJECT DESCRIPTION	6
2.1	General Environmental Information	6
2.1.1	Geology	6
2.1.2	Climate	7
2.1.3	Previous exploration work	7
2.1.4	Existing Placer Workings	7
2.1.5	Vegetation, Soils, and Permafrost	7
2.1.6	Surface Water	8
2.1.7	Ground Water	8
2.1.8	Alluvium	8
2.1.9	Bedrock	9
2.1.10	Background Water Chemistry	9
2.2	Schedule of Operations	13
2.3	Existing Facilities and Conditions	14
2.3.1	Access and Haul Roads	14
2.3.2	Pits	14
2.3.3	Waste Rock Dumps	14
2.3.4	Ore Stockpile Pads	14
2.3.5	Temporary Non-PAG Stockpile	15
2.3.6	Growth Media Stockpiles	15
2.3.7	Ice-rich Overburden	15
2.3.8	Laydown Yards and Miscellaneous Structures	15
2.4	Surface Disturbance	16
3	WETLANDS	19
3.1	Department of the Army Section 404 Permit	19
4	WATER MANAGEMENT	21
4.1	General	21
4.2	Surface Drainage	21
4.3	Pit Lakes	24
4.3.1	Main Gil Pit	25
4.3.2	North Gil Pit	25

4.3.3	Sourdough Pits	25
4.4	Water Quality	26
5	RECLAMATION PRACTICES	27
5.1	Schedule of Reclamation Activities	27
5.1.1	Waste Rock Dumps	27
5.1.2	Pits	28
5.1.3	Haul and Access Roads	28
5.1.4	Laydown Yards and Miscellaneous Structures	28
5.1.5	Ore Stockpile Pads	28
5.2	General Reclamation Procedures	31
5.2.1	Earthwork	31
5.2.2	Control of Sedimentation	31
5.2.3	Growth Media	31
5.2.4	Seedbed Preparation	32
5.2.5	Fertilizer and Fertilization	32
5.2.6	Seed and Seeding	33
5.2.7	Revegetation Timing	33
5.2.8	Gil Vegetative Restoration Studies	33
5.2.9	Revegetation Cover Criteria	34
5.3	Final Reclamation Topography	34
5.4	Public Access	34
5.5	Financial Assurance Release	34
6	FACILITY SPECIFIC RECLAMATION AND CLOSURE	35
6.1	Waste Rock Dumps	35
6.2	Building and Equipment Sites	35
6.3	Petroleum Aboveground Storage Tanks	35
6.4	Well Closure	36
6.5	Roads	36
6.6	Growth Media Stockpiles	36
7	MONITORING	37
7.1	Post Reclamation Maintenance	38
8	ESTIMATE OF RECLAMATION AND CLOSURE COSTS	40
9	REFERENCES	41

TABLES

Table 2-1:	Analytical Suite.....	11
Table 2-2:	Mining and Reclamation Schedule.....	13
Table 2-3:	Disturbance Area at Life of Mine.....	16
Table 4-1:	Main and North Gil Pit Water Balance and Time to Fill Summary	25
Table 5-1:	Estimated Growth Media Inventory and Estimated Volume Requirements ...	32
Table 5-2:	Seed Mix	33
Table 7-1:	Gil Monitoring Points	37

FIGURES

Figure 1-1:	Project Location	4
Figure 1-2:	Surface Ownership.....	5
Figure 2-1:	Project Area Conditions	12
Figure 2-2:	Development Location	17
Figure 2-3:	General Arrangement.....	18
Figure 3-1:	Wetlands	20
Figure 4-1:	Drainage Plan	22
Figure 4-2:	Typical Sections.....	23
Figure 4-3:	Dupuit–Forchheimer - Diagram.....	24
Figure 4-4:	Spatial Distribution of ICP Sulfur Results Relative to Modeled Redox in North and Main Gil Pit Shells	26
Figure 5-1:	Post Reclamation - Area Wide	29
Figure 5-2:	Post Reclamation - Project Area	30
Figure 7-1:	Gil Monitoring Locations.....	39

LIST OF ACRONYMS

AAC	Alaska Administrative Code
ac-ft	acre-feet
ADEC	Alaska Department of Environmental Conservation
ADF&G	Alaska Department of Fish and Game
ADNR	Alaska Department of Natural Resources
ARD	acid rock drainage
AS	Alaska Statute
BMP	Best Management Practice
BTEX	benzene, toluene, ethyl benzene, and xylene
CPI	Consumer Price Index
FA	Financial Assurance
FGMI	Fairbanks Gold Mining, Inc.
ft	feet
ft-amsl	feet above mean sea level
GM	Growth Media
HLP	Heap Leach Pad
INCO	Company name-patented cyanide destruction process
LLDPE	Linear Low-Density Polyethylene
LOM	Life of Mine
MHTLO	Mental Health Trust Land Office
mg/L	milligrams per liter
ML	metal leaching
PAG	potentially acid generating
RCP	Reclamation and Closure Plan
SRCE	Standardized Reclamation Cost Estimator
TDS	total dissolved solids
TSF	Tailings Storage Facility
USACE	U.S. Army Corps of Engineers
WAD CN	weak acid dissociable cyanide
WRD	Waste Rock Dump
WRMP	Waste Rock Management Plan
WSE	Water Surface Elevation

1 INTRODUCTION

1.1 Purpose

This Reclamation and Closure Plan (RCP) includes information necessary to perform reclamation, monitoring, and post-mining land use for the Gil Project, independent of the Fort Knox Mine.

This RCP has been updated from previous versions to incorporate changes to the mine plan and proposed closure strategies since the previous RCP submittal (FGMI, 2021). FGMI has updated and revised the RCP to address reclamation, monitoring, and post-mining land use for the Gil Project, distinct from the Fort Knox Mine. The previous RCP for the Gil Project was included as an amendment to the approved RCP for Fort Knox Mine, but the RCP described below will separate Gil reclamation from Fort Knox reclamation and supersede the previous submissions. Specific reclamation practices not implicitly stated within this document shall refer to the most recent RCP for Fort Knox.

This document will be submitted to:

- Alaska Department of Natural Resources, Division of Mining, Land and Water, Mining Section (ADNR) in accordance with AS 27.19.010 et. seq. and 11 AAC 97.100 et. seq.
- Alaska Department of Environmental Conservation (ADEC), Division of Water, as required by Waste Management Permit 2020DB0002.
- U.S. Army Corps of Engineers (USACE) as required by the Clean Water Act Section 404 Permit No. N-920574, Fish Creek.

1.2 Applicant Information

Fairbanks Gold Mining, Inc.

A Subsidiary of Kinross Gold USA, Inc.

PO Box 73726

Fairbanks, AK 99707-3726

Telephone: (907) 488-4653

Fairbanks Gold Mining, Inc. Officer Completing Application

Name: Shane Parrow

Title: VP & GM Kinross Alaska

Telephone: (907) 490-2279

Designated Contact Person

Name: Bartly Kleven

Title: Environmental Affairs Director, Alaska

Telephone: (907) 490-2207

Kinross Gold Corp. Information

Mailing Address: 5075 S. Syracuse Street, 8th Floor
Denver, Colorado 80237

Physical Address: 17-25 York Street
Toronto, Ontario
Canada, M5J 2V5

Telephone: (416) 365-5123

President & Chief Executive Officer:	J. Paul Rollinson
Senior Vice President and Chief Legal Officer:	Geoffrey Gold
Executive Vice President & Chief Operating Officer:	Claude Schimper
Senior Vice President & Chief Financial Officer:	Andrea Freeborough
Vice President Global Health and Safety:	Helisangela Alencar

Alaska Registered Agent

Agent Name: United Agent Group, Inc.
Mailing Address: PO Box 33735
Juneau, Alaska 99803
Physical Address: 3085 Mountainwood Circle
Juneau, Alaska 99801
Telephone: 1-866-761-1444

Other Leaseholders

Name: Melba Creek Mining, Inc.
Mailing Address: 1700-25 York St, 17 Floor
Toronto, Ontario
Canada, M5J2V5
(775) 829-1000

Treasurer & Vice President	Caroline E.S. Wild
Director & Vice President	Gina R. Myers
Director & President	Korey Christensen
Director & Secretary	Martin D. Litt
Shareholder	Kinam (B.C.) Ltd.

1.3 Location and Land Status

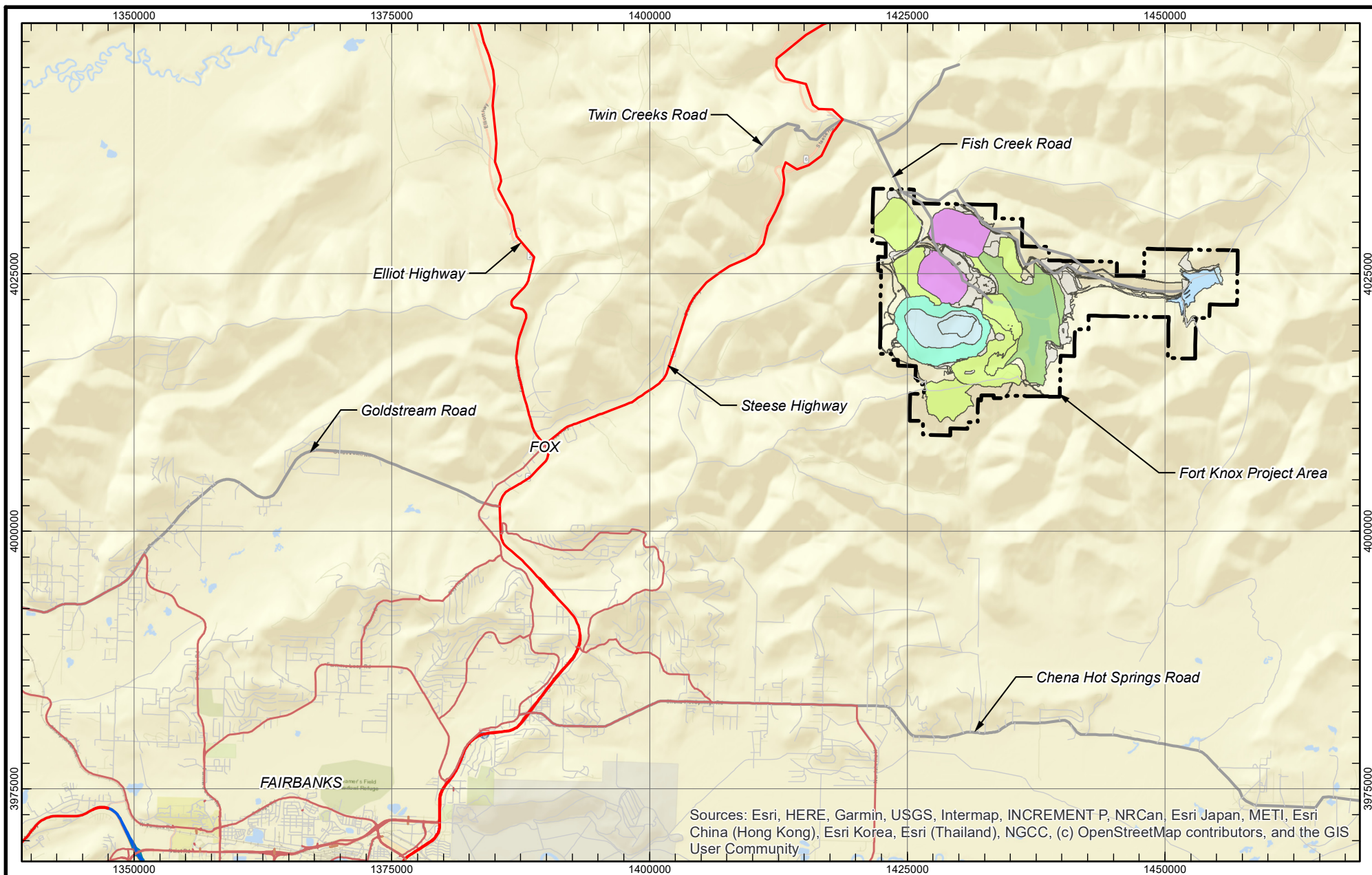
Fort Knox Mine is located approximately 15 air miles northeast of Fairbanks, Alaska in the Fish Creek drainage. Specifically, the mine occupies portions of Sections 4-5, 7-23, and 26-29,

Township 2 North, Range 2 East, Fairbanks Meridian, as well as Sections 7-8 and 17-19, T2N, R3E, Fairbanks Meridian.

The Gil Project is located approximately seven miles east of Fort Knox Tailings Storage Facility (TSF). The project includes mining activities in Sections 2-3 and 10-11 T2N, R3E, Fairbanks Meridian. An access road connects current mining operations, traversing sections 10-11, 15-16, and 18-21 T2N, R3E, Fairbanks Meridian. **Figure 1-1** illustrates the location of the development and current mining operations.

The Gil Project is covered under three Leases: the Gil Millsite Lease (438.5 acres) (ADL 233700) from ADNIR, a Ground Lease (MHT 9400735) from the Alaska Mental Health Trust Land Office (MHTLO) (173.5 acres), and an easement (MHT 9400736) from the MHTLO increasing the total leased area by approximately 612 acres. The total project leased area increases from 9,463 acres to 10,075 acres. **Figure 1-2** illustrates the lease boundary of the project areas. A list of the mining claims within the vicinity of the Gil Project is included in Appendix C of the 2026 Fort Knox RCP (FGMI, 2026).

The Fort Knox mine plan has been revised to incorporate the Gil Project as a satellite operation including pits and waste rock storage within three small tributaries to Fish Creek (All Gold Creek, Slippery Creek, and Wilson Creek). This document provides a summary of the construction activities and planned reclamation for the proposed satellite operation. Financial assurance for reclamation and closure activities at the Gil Project are included in the Fort Knox reclamation and closure estimate.



Sources: Esri, HERE, Garmin, USGS, Intermap, INCREMENT P, NRCan, Esri Japan, METI, Esri China (Hong Kong), Esri Korea, Esri (Thailand), NGCC, (c) OpenStreetMap contributors, and the GIS User Community

Project Location Gil Project Reclamation and Closure Plan

Figure 1-1

Date: February 2026

LEGEND:

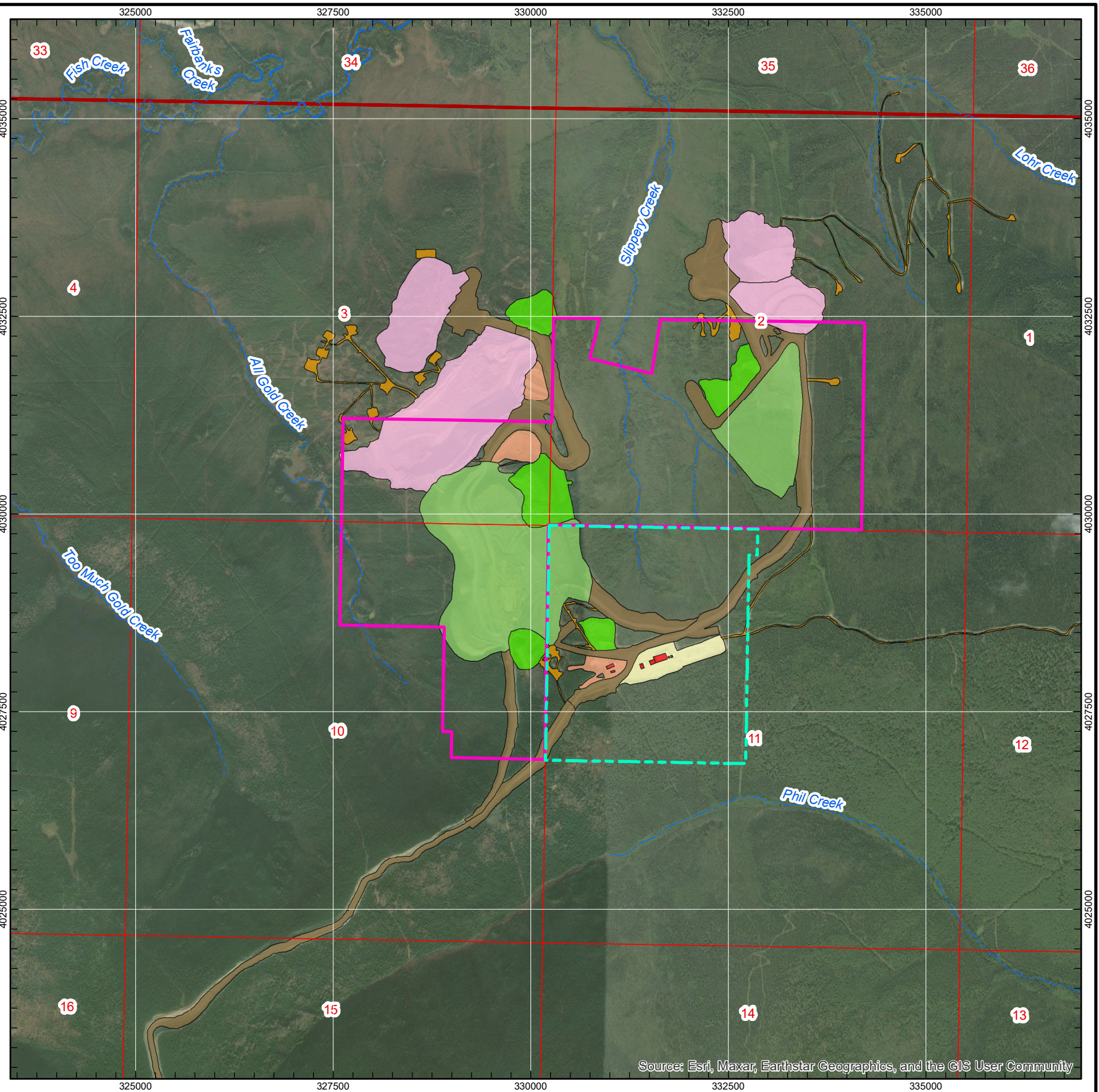
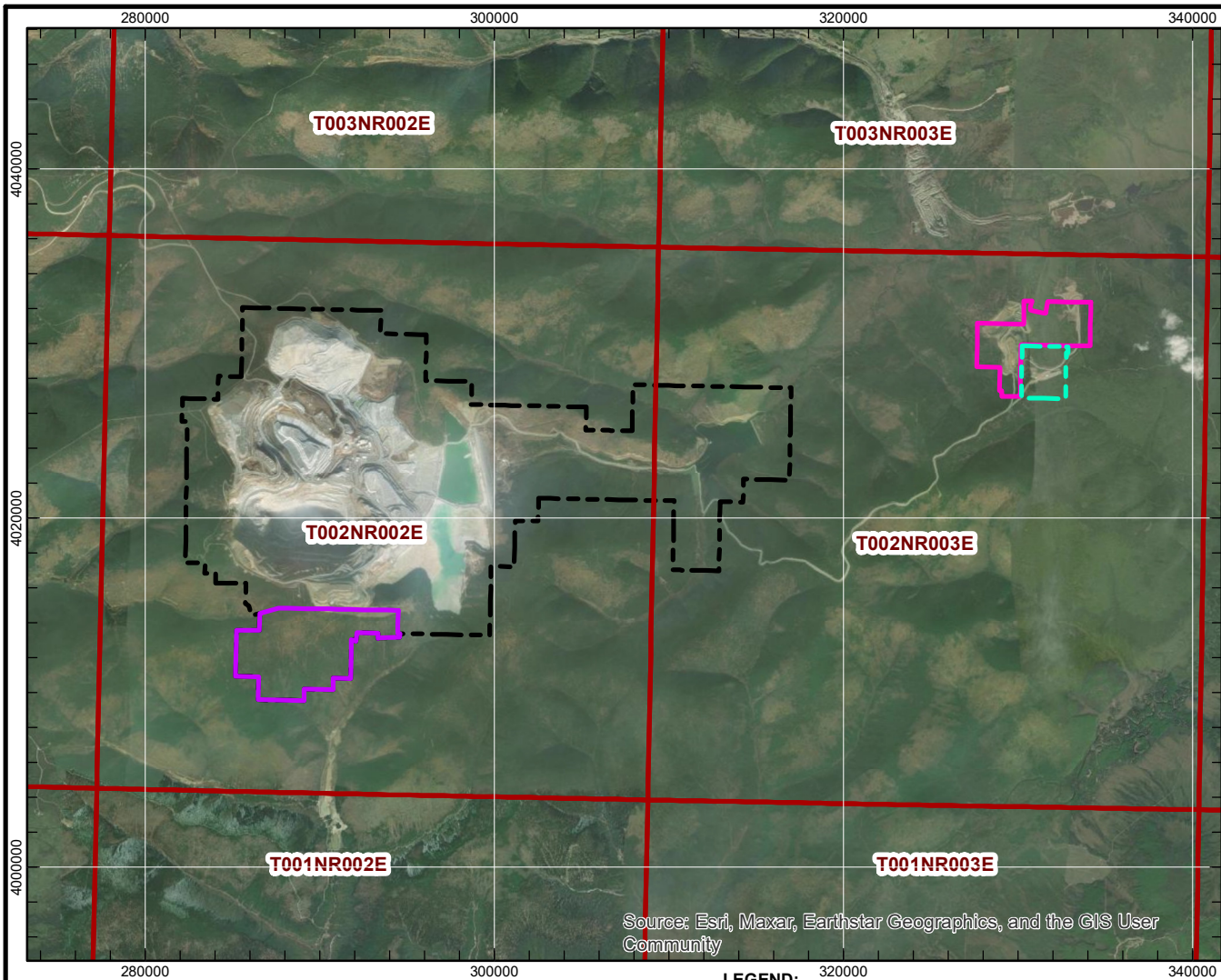
- Other Disturbance
- Heap Leach Facility
- Waste Rock Dump
- Reservoir
- Pit
- Tailings



Fort Knox Project Area

0 1 2
1"=2 miles
Miles
NAD1983StatePlaneAlaska3FIPS5003Feet

KINROSS Fort Knox





Fort Knox

Surface Ownership
Gil Project Reclamation and Closure Plan

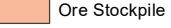
Figure 1-2

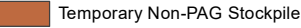
Date: February 2026

LEGEND:

 Drainage

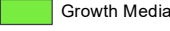
 Building

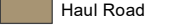
 Ore Stockpile

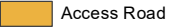
 Temporary Non-PAG Stockpile

 Waste Rock Dump

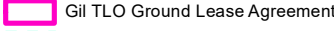
 Pit

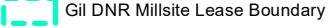
 Growth Media

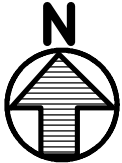
 Haul Road

 Access Road

 Yard

 Gil TLO Ground Lease Agreement

 Gil DNR Millsite Lease Boundary



1" = 1,500'

0750150022503000

NAD 1927 StatePlane Alaska 3 FIPS 5003

2 PROJECT DESCRIPTION

FGMI operates the Gil Project, located northeast of Fairbanks, Alaska. The mine site is located in the upper headwaters of Fish Creek Valley, approximately four miles southeast of Cleary Summit. The project site is accessible via Fish Creek Road. The Gil Project operations refer exclusively to open-pit mines. The Gil Project utilizes facilities at the Fort Knox Mine, primarily heap leach facilities and related milling facilities to recover gold jointly with Fort Knox Mine ore.

Development of the Gil Project began as planned in 2021, with mining of the Main Gil Pit starting in late 2021. Mining operations expanded to the North Gil and Sourdough Pits in 2023. All pits were actively mined until late 2024, when the site transitioned to temporary closure to support new exploration at Gil (FGMI, 2024). Exploration drilling is anticipated to continue into 2025 with mining potentially resuming in late 2025 pending drilling results. Because the results of this drilling program are not yet available, it is assumed that Gil will remain in temporary closure until mid-2028, at which point reclamation will begin concurrently with Fort Knox.

2.1 General Environmental Information

2.1.1 Geology

The Gil Project is in the Fairbanks Mining District in the northeastern part of the Yukon-Tanana Uplands. The mining district is divided into four metamorphosed stratigraphic groups: the Chatanika sequence, Fairbanks Schist, Chena River sequence, and Birch Hill sequence. The Gil Project deposit geology is underlain by the Fairbanks Schist unit. The Fairbanks Schist consists largely of quartz-muscovite schist, quartzite, and chlorite quartzose schist (Zf) of the Early Proterozoic and comprises most of the bedrock across the study area. The exposed bedrock within the Project area is light-to-medium gray, fine-to-coarse grained, quartzite, quartz muscovite schist, and garnet-biotite-quartz-muscovite schist. This unit is moderately resistant to weathering due to its relatively high quartz content (KP, 2015).

Gold mineralization at Gil primarily occurs in quartz-sulfide and quartz-carbonate veins, clay-filled shear zones, and limonite-stained fractures, which crosscut nearly all lithologies. Gold mineralization is widespread, but grade and continuity are related to complex interactions among hydrothermal fluids, host rocks, and structures.

At Main Gil and South Sourdough, gold mineralization largely appears strata-bound within calc-silicate units, however, field-level observations show that gold mineralization is predominantly localized within veins and joints in highly fractured rock. Veins are discrete (up to 30 cm wide) and consist of white quartz veins and late-stage thin, discrete quartz-calcite ($\pm$ actinolite/pyroxene) veins. Both sets of veins tend to be steeply dipping and crosscut foliation. Alteration in the Main Gil zone is represented by an intense retrograde assemblage of calc-silicate minerals. Hydrothermal fluid interaction with a carbonate-rich protolith and calc-silicate minerals enhanced the precipitation of gold and sulfides.

At North Gil and North Sourdough, gold is almost exclusively associated with quartz veining. These veins occur within quartz-mica schist, feldspathic schist, and calcareous biotite-chlorite-quartz schist. The quartz veins are typically less than 5.1 cm in width and consist of milky-white quartz-arsenopyrite, quartz-calcite, and quartz-feldspar veins. Alteration is vein-controlled and consists of sericitic to potassic (secondary biotite) alteration along vein margins. Pyrite and/or arsenopyrite are the most common accessory minerals observed in the veins, typically in concentrations of <1%.

2.1.2 Climate

The site is located in the interior basin of Alaska, with a continental sub-arctic climate with the warmest summers and the lowest recorded winter temperatures in the state. Annual precipitation ranges from 13 to 22 inches (America North, 1992). Historically the wettest months include June to September with August usually being the wettest. The driest months are historically February through April.

2.1.3 Previous exploration work

Exploration work has been conducted in the Gil Project area intermittently for the last 20 years, including exploration drilling and test pitting and subsurface investigations for resource estimation. Access roads and drill pad disturbances exist throughout the project area, many of which have been reclaimed or vegetation has naturally reinvaded disturbances. No other surface disturbance has been performed in the area prior to development of the Gil Project in 2021.

2.1.4 Existing Placer Workings

The Fairbanks Mining District is a celebrated placer gold camp. Although a significant mining district in terms of total production, it had only limited lode production until the discovery and development of the Fort Knox deposit in the 1990s. Since the 1930s, extensive placer mining has occurred in the project area. Tailings piles, ponds, levees, channels, and ditches were constructed along the valley floor, extending from approximately midway up Monte Cristo Creek downstream to the confluence of Solo and Fish Creeks. Monte Cristo, Barnes, Yellow Pup, Pearl, Fish and Last Chance Creeks have been placer mined in the past. As a result of this placer mining, the thick cover of loess and alluvium covering the valley floor has been removed. Solo Creek and a major portion of Upper Barnes Creek have not been impacted by placer mining. Placer workings, both historic and active, exist immediately downstream of the project along Fish Creek. Historic placer workings are likely to have occurred along the streams adjacent to the site, but visual evidence is not obvious near the proposed developments.

2.1.5 Vegetation, Soils, and Permafrost

The area is predominantly forested. Well-drained soils of the uplands and alluvial plains are covered mainly with white spruce (*Picea glauca*) and a mixture of broadleaf trees such as paper birch (*Betula papyrifera*) and quaking aspen (*Populus tremuloides*). The climax forest on well-drained soils in the area is white spruce.

The moderately well-drained and imperfectly drained soils may support forests similar to those on the well-drained soils, but more commonly, black spruce (*Picea mariana*) and willow (*Salix spp.*) are found. Mosses (*Sphagnum spp.*), along with horsetail (*Equisetum spp.*) and grass typically cover the ground.

The poorly drained soils with a shallow permafrost elevation generally support communities of black spruce, willow, and alder (*Alnus spp.*). A thick moss mat, principally *Sphagnum spp.*, covers the ground. Lichens such as *Cladonia spp.* and *Peltigera spp.* are common in the moss mat as well. This mat supports a dense cover of shrubs, primarily bog birch (*Betula glandulosa*), spirea (*Spirea beauverdiana*), Labrador tea (*Ledum decumbens*), cranberry (*Vaccinium vitis-idaea*), and blueberry (*Vaccinium uliginosum*). Tussocks of cottongrass (*Eriophorum spp.*) are also common, especially along the toe slopes.

There are no known federal or state threatened or endangered plants or wildlife species inhabiting any portion of the Gil Project site (ENSR Corporation, 2006).

Permafrost and ice-rich soils are present within and near the Gil Project. The presence of permafrost primarily occurs in the silty loam soils of the United States Department of Agriculture

– Natural Resources Conservation Services (USDA-NRCS) identified units associated with the Ester, Goldstream, Pergelic Cryochemists, Histic Pergelic Cryaquepts, and Saulich soils. Thaw stability, i.e., the tendency for a soil to maintain shear strength and stiffness during and after thawing, is dependent not only on soil type but also on natural moisture content (KP, 2015).

Fine grained soils with elevated moisture content, due to the materials ground ice content, have been identified as not thaw-stable once the organic mat is removed or disturbed and permafrost thaw initiates. Areas of potentially unstable soils have been identified in the lower reaches of the All Gold and Slippery Creeks near the project disturbance, but not within the proposed footprints of the waste rock dumps (KP, 2015). The presence of permafrost is likely within the Waste Rock Dump (WRD) foundation footprints. However, surficial organics and soils will be stripped to competent soils or bedrock prior to placement of waste rock. Unstable soils are not anticipated within the WRD footprints.

2.1.6 Surface Water

The project is located within the Fish Creek Watershed and along the headwaters of minor tributaries to Fish Creek including All Gold, Slippery, and Lohr Creeks (**Figure 2-1**). All development will occur within the Fish Creek watershed, and runoff will be managed for sediment prior to discharge into the watersheds. Discharges from waste rock dumps, pits, or other facilities will be monitored as described in **Section 7**.

2.1.7 Ground Water

Overburden depth varies throughout the project area, while groundwater is found near (50-150 feet below ground surface) the pit areas on the ridgelines and the water table likely intersecting ground surface in the stream valleys adjacent to the pits. Water levels are monitored in four wells adjacent to the Gil Pits. Hydraulic conductivity of the bedrock within the pit areas was estimated at 1.2×10^{-8} m/sec (KP, 2015). SRK used available information to develop a conceptual-level ground water model to determine probable pit inflows and pit lakes at closure.

2.1.8 Alluvium

In its undisturbed state, the alluvium typically consists of a thin layer of organic soils, moss, and vegetation, underlain by organic silts with occasional channel deposits of sand and gravel, which is then underlain by a layer of poorly-sorted gravel.

The surficial thin layer of organic soils, moss and vegetation contains the modern-day drainage systems. Underlying the surficial layer is a 25 to 35-feet thick layer of organic silt with occasional channel deposits of sand and gravel. This deposit of organic silt is also restricted to the valley floor and ranges in width from approximately 400 to 1,800-feet and has an estimated maximum thickness of up to 35-feet. Grain sizes in the underlying gravel material range from as large as 1- to 2-foot diameter boulders, to sand and gravel in a matrix of fine silts and clay overlying an erosional, mineralized surface of weathered bedrock. Restricted to the valley floor, this mineralized, gold-bearing gravel deposit varies in width from an estimated 200 feet up to 1,200 feet and has an estimated thickness of up to 25-feet along the valley axis. The basal gravel layer pinches out along the valley edges. It is reported that both the basal gravel and the overlying organic silts had been mostly permanently frozen in their undisturbed state.

As the basal gravel deposits have historically been the primary economic placer gold-bearing deposit in the region, most of the valley fill described above has been modified. Soils and the organic silts have been removed to access the gold-bearing gravels. The gold-bearing gravels in turn were reworked and washed to remove the gold. The tailings produced from this procedure were deposited in the mined-out portions of the valley. In many places these tailings were used to construct settling ponds to settle out silt and clay from placer mining discharge. As a result,

much of the modern-day alluvium consists of a heterogeneous mix of poorly sorted material grading from coarse gravel to fine silts and clay often found in a somewhat inverted stratigraphy where the coarse-grained gravels overlie fine-grained silts and sands. Numerous pockets of predominantly fine-grained materials from the old settling ponds exist throughout the valley. Similarly, local lenses of well-sorted and well-stratified sands and gravel deposited by stream flow are also present. Much of this reworked valley fill may now be thawed and subject only to seasonal frost action (Water Management Consultants, 2006a).

2.1.9 Bedrock

The underlying bedrock aquifer consists primarily of Fairbanks schist, the host rock of the Gil Project. The upper portion of the bedrock (ranging up to 100 feet in thickness) is highly weathered. The degree of weathering depends on the original lithologic content of the bedrock and exposure. Weathering characteristics consist of intense fracturing, alteration of primary minerals to clays and oxides (such as iron oxide), dislocation from soil creep and the filling of fractures with sand, silt, and clay.

Movement of groundwater in the bedrock aquifer occurs down valley through structural zones that act as conduits. The degree of fracturing observed during the drilling of bedrock monitoring wells was variable, as indicated by the range of hydraulic conductivities calculated from pump test data, ranging from 280 to 0.28 feet/day. The greatest fracturing, and hence higher hydraulic conductivities, are found in the valley floor locations. Hydraulic conductivities are observed to be lower in wells completed at the hillside locations. This is related to two factors:

1. The greater degree of fracturing observed in the valley floor is related to the shallow depth to bedrock and more intense weathering.
2. The greater degree of fracturing observed in the valley floor is likely related to shear zones that control the development of local drainages. Based on drilling completed as part of initial site characterization, the estimated depth of effective fracturing below the permafrost in the bedrock is expected to be 300 to 500 feet. Below this depth, fracture frequency and permeability decrease significantly.

Data from pumping tests indicate that the bedrock fracture systems are directly connected with the overlying alluvial aquifer system in most locations. Water level declines observed in alluvial wells completed adjacent to bedrock pumping wells were relatively instantaneous and similar in magnitude, suggesting a strong hydraulic connection between the alluvial system and the underlying fractured bedrock (Water Management Consultants, 2006a and 2006b).

2.1.10 Background Water Chemistry

The mean and 95% Upper Confidence Limit surface water chemistry data from the Slippery Creek drainage, collected from 2011 through 2019, shows no exceedances of Alaska Water Quality Standards. The surface water sample from Slippery Creek on June 28, 2016, had a detection of Total Aluminum at 96.60 mg/L, with reported Hardness (Mg as CaCO₃) of 155 mg/L, Hardness (Ca as CaCO₃) of 100 mg/L, and a Total Hardness of 255 mg/L.

Aluminum was detected in 21 other monitoring samples with concentrations ranging from 0.027 to 24.8 mg/L; based on these results, the single exceedance of the aluminum water quality standard observed in June 2016 is considered an anomaly. The most stringent criterion for total aluminum is for Aquatic Life-Fresh Water Chronic guideline, which is 87 mg/L. Values for Total Dissolved Solids (TDS) ranged from 96 to 340 mg/L, with alkalinity as bicarbonate ranging from 24 to 157 mg/L, and total alkalinity ranging from 24 to 170 mg/L.

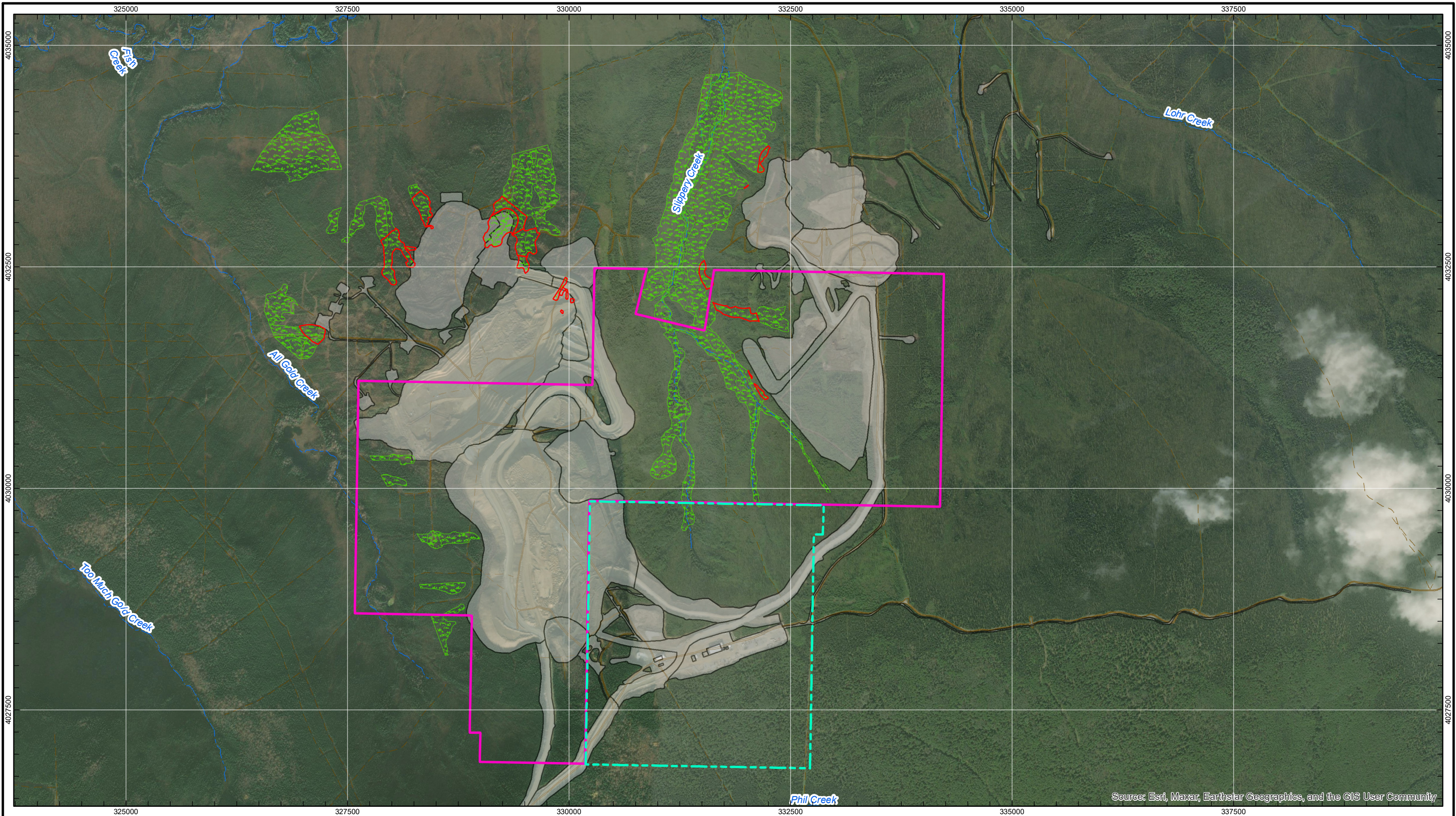
Surface water is monitored in the Slippery Creek drainage from monitoring points MW-4, MW-5, and Slippery Creek (see **Figure 7-1**). Metals parameters at Slippery Creek were for total metals only, no dissolved metals were collected for the Slippery Creek surface water location. Note that

for monitoring wells MW-4 and MW-5, in general, the analytical suite was for dissolved metals with no total metals, except for calcium and magnesium, which were also analyzed for dissolved.

The analytical suite at Slippery Creek Monitoring Location is included in **Table 2-1**. A total of 24 sampling events (excluding when frozen) were conducted between May 11, 2019 and September 24, 2019 (for the sampling period analyzed). The groundwater had consistently higher Total Alkalinity, ranging from 151 to 196 mg/L, and TDS ranging from 580 to 670 mg/L. It is likely that shallow alluvial groundwater has hydraulic connectivity to lower surface waters within the Slippery Creek drainage due to steepness of the terrain.

Table 2-1: Analytical Suite

Alkalinity, Bicarbonate (mg/L as CaCO ₃)	Hardness Ca as CaCO ₃ (mg/L)	Selenium, Total (mg/L)
Alkalinity, Carbonate (mg/L as CaCO ₃)	Hardness Mg as CaCO ₃ (mg/L)	Silica, Total (mg/L)
Alkalinity, Hydroxide (mg/L as CaCO ₃)	Hardness, Total (mg/L as CaCO ₃)	Silicon, Total (mg/L)
Alkalinity, Total (mg/L as CaCO ₃)	Iron, Total (mg/L)	Silver, Total (mg/L)
Aluminum, Total (mg/L)	Lead, Total (mg/L)	Sodium, Total (mg/L)
Ammonia (mg/L as N)	Magnesium, Total (mg/L)	Solids Settleable ml/L
Antimony, Total (mg/L)	Manganese, Total (mg/L)	Solids, Dissolved-sum Of Constituents (mg/L)
Arsenic, Total (mg/L)	Mercury, Total (mg/L)	Specific Conductance (umhos/cm @ 25C)
Barium, Total (mg/L)	Nickel, Total (mg/L)	Specific Conductance, Field (umhos/cm @ 25C)
Bicarbonate as HCO ₃	Nitrate Nitrogen, Dissolved (mg/L as N)	Sulfate (mg/L)
Bismuth, Total (mg/L as Bi)	Nitrate Nitrogen, Total (mg/L as N)	Sum of Anions, Total (meq/l)
Cadmium, Total (mg/L)	Nitrite (mg/L as N)	Sum of Cations, Total (meq/l)
Calcium, Total (mg/L)	Nitrite Nitrogen, Dissolved (mg/L as N)	Temperature, Water (Degrees Centigrade)
Cation & Anion Sum, Total In Water (mq/L)	Nitrite Plus Nitrate, Dissolved (mg/L as Nitrogen)	Temperature, Water (Degrees Fahrenheit)
Cation Anion Balance, % difference	Nitrite Plus Nitrate, (mg/L as Nitrogen)	Total Dissolved Solids (mg/L)
Chloride (mg/L)	OTP %	Total Petroleum Hydrocarbons (mg/L)
Chromium, Total (mg/L)	pH (Lab-su)	Total Suspended Solids (mg/L)
Copper, Total (mg/L)	pH, Field, Standard Units	Turbidity, lab Nephelometric Turbidity Units, Ntu
Cyanide, Total (mg/L)	Phosphorus (mg/L as P)	Weak Acid Dissociable Cyanide (mg/L)
Fluoride (mg/L)	Potassium, Total (mg/L)	Zinc, Total (mg/L)



Source: Esri, Maxar, Earthstar Geographics, and the GIS User Community

	Project Area Conditions Gil Project Reclamation and Closure Plan	LEGEND: Trail Unpaved Road Drainage Existing Development Facility Disturbance Wetland Impacted Wetlands Gil TLO Ground Lease Agreement Gil DNR Millsite Lease Boundary	1" = 1,000' NAD 1927 StatePlane Alaska 3 FIPS 5003
	Figure 2-1		
	Date: February 2026		

2.2 Schedule of Operations

Construction of the main haul road connecting Fort Knox to the Gil Project began in mid-2021. Development associated with the Main Gil Pit and Gil Waste Rock Dump began in late 2021, and mining ended in the Main Gil Pit in late 2023. Development and mining of the smaller Sourdough satellite pits and the Sourdough WRD began in 2023 while development of the North Gil started in the same year. The Gil Project has entered temporary closure as of October 2024 to support exploration drilling, which is expected to continue until mid-2025 (FGMI, 2024 and 2026). Until results from this drilling program are available, Gil will remain under care and maintenance. Reclamation activities will begin in mid-2028 and conclude in 2030, assuming no further mining activities occur. **Table 2-2** summarizes the schedule for mining and reclamation activities for the Gil project.

Table 2-2: Mining and Reclamation Schedule

Project Phase - Gil Project	Temporary Closure Q3 2024-->				Mining Ends Mid Year 2028-->				Reclamation Period	
	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030
Calendar Year										
Activity										
Construction of Main Access Haul Road										
Mining Main Gil Pit										
Mining North Gil Pit										
Construction of Gil WRD										
Mining Sourdough Pits										
Construction of Sourdough WRD										
Exploration Drilling										
Reclamation of WRDs										
Reclamation of Pits										
Reclamation of Haul Roads and Access Roads										
Reclamation of Yards and Misc. Structures										
Reclamation of Ore Stockpile Pads										
Reclamation of BMPs and Maintenance										

2.3 Existing Facilities and Conditions

The Gil Project is located approximately six miles east of the freshwater reservoir at Fort Knox. The project is connected by a production haul road originating at Fort Knox, crosses the Gil Causeway (upstream of the freshwater reservoir dam), and ends at the Gil Project. **Figure 2-2** illustrates the existing configuration of the Gil Project development, along with associated facilities, in relation to the existing mining operations at Fort Knox.

2.3.1 Access and Haul Roads

The connection between the Fort Knox mine and the Gil Project included upgrading an existing access road to accommodate off-road mining trucks. The road was constructed using cut-to-fill construction with a stable non-erodible surface course. The road is approximately eighty feet wide with safety berms as required, with a running/driving width of approximately sixty feet. The road was constructed pursuant to AS 16.05.841 and the following Fish Habitat Permits: FH15-III-0218-AMENDMENT 1, FH15-III-0219-AMENDMENT 2, FH18-III-0039-AMENDMENT 1, and FH21-III-0076.

2.3.2 Pits

The pits were developed in phases, starting with the Main Gil Pit in 2021, followed by the North Gil Pit and Sourdough Pits in 2023. Organics and suitable growth media were stripped and stockpiled for later use during reclamation. Overburden and waste rock will be placed in one of the three WRDs. Ore will be hauled to the mill or to the Barnes Creek Heap Leach Pad at Fort Knox.

2.3.3 Waste Rock Dumps

Construction of all WRDs follows a similar approach and generally involves end dumping waste rock in a benched configuration. The benches are developed to allow for minimal regrading at closure and provide a stable and consistently sloped surface from top to bottom of the dump. **Figure 2-3** depicts the end of mining configuration and locations of the WRDs.

Gil WRD

The Gil WRD is located immediately upstream and adjacent to the Main Gil Pit and will accept waste rock from the Main as well as the upper reaches of the North Gil and Northwest Gil pits. The dump will reach an ultimate elevation of approximately 1,700 feet above mean sea level (ft-amsl) and have a footprint of approximately 81.79 acres. The footprint of the WRD was stripped of organic materials and growth soils prior to placement of waste rock.

Sourdough WRD

The Sourdough WRD is located immediately upstream of the Sourdough Pits. The dump will reach an ultimate elevation of approximately 1,500 ft-amsl and has a footprint of approximately 28.79 acres. The footprint of the WRD was stripped of organic materials and growth media prior to placement of waste rock.

2.3.4 Ore Stockpile Pads

Two ore stockpile pads are used to temporarily stage ore prior to hauling to Fort Knox for processing. Ore Stockpile 1 is located near the laydown yard, and Ore Stockpile 2 is located between the Main Gil Pit and the Gil WRD. The pad foundations are constructed using fill material sourced from within the pad footprint and overburden stripped from the pit waste rock. Two temporary tent structures were constructed on Ore Stockpile 1 in 2023. The stockpile sizes will vary throughout operations, and upon conclusion of mining operations, and all ore will be removed

from the pads and processed prior to closure. **Figure 2-3** depicts the final configuration and locations of the ore stockpiles.

2.3.5 Temporary Non-PAG Stockpile

A temporary waste rock stockpile containing acid-neutralizing potential waste rock, used for blending with potentially acid generating (PAG) waste rock, has been constructed near the rim of the Main Gil Pit for potential future use.

2.3.6 Growth Media Stockpiles

Prior to the placement of waste rock and development of the pits, all organics and suitable growth media will be stripped and stockpiled for later use during reclamation. The depth of growth media and suitable soils varies, with current inventories available in

Table 5-1. A minimum of one foot of material is assumed to be stripped and stockpiled for all undisturbed areas. An audit of growth media availability was conducted by FGMI in 2024, and current inventories indicate that sufficient material has been stockpiled for reclamation activity. Surplus stockpiled material not used for reclamation will remain in place. **Figure 2-3** depicts the locations of the five stockpile areas.

2.3.7 Ice-rich Overburden

Ice-rich or unsuitable foundation soils encountered during stripping of growth media will be stockpiled and placed within the footprints of the growth media stockpiles or within the footprint of the waste rock dumps. Until thawed and drained, ice-rich soils are unsuitable for construction, placement as cover, or used for stockpile foundations. Pore-water released from thawing will be captured and treated using best management practices for managing stormwater.

2.3.8 Laydown Yards and Miscellaneous Structures

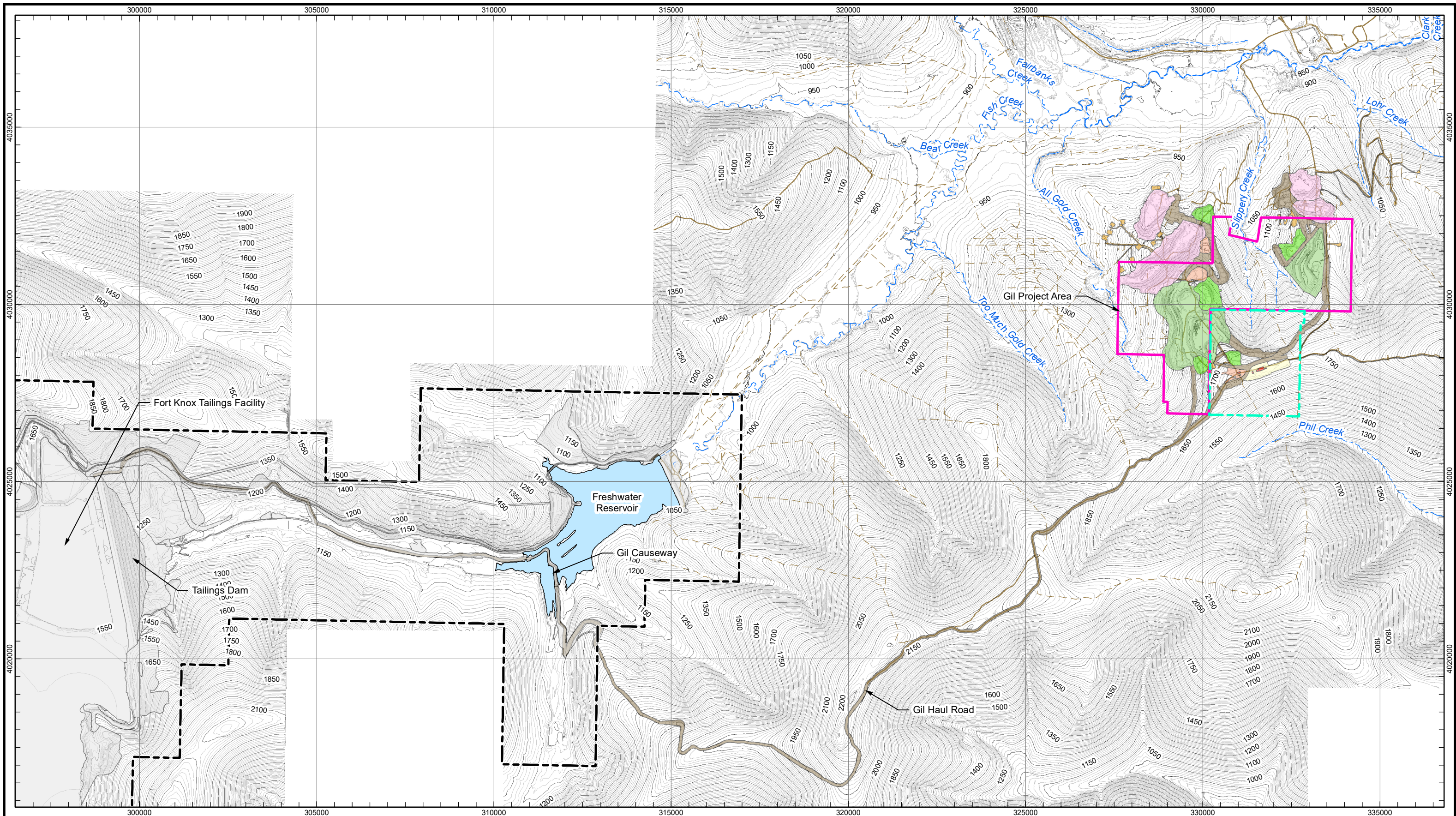
A single laydown yard is located at the apex of a ridgeline separating Phil Creek from Fish Creek, upstream of Gil Project area. The laydown yard is used to store equipment when not in use and provide an area for temporary tent structures for personnel and equipment. A truck shop and temporary fueling station (fuel island) for equipment were constructed in 2021 to accommodate maintenance and mining operations. The laydown yard, structures and fuel island are shown in **Figure 2-3**.

2.4 Surface Disturbance

The two-dimensional disturbance areas are listed in **Table 2-3** which includes all areas disturbed during development of the Gil Project. **Figure 2-2** and **Figure 2-3** illustrate the disturbance areas for the Gil Project.

Table 2-3: Disturbance Area at Life of Mine

Facility	Total Disturbance Area - Gil Project
	Acres
Waste Rock Dumps	110.6
Roads	186.2
Pits	106.2
Buildings and Laydown Yards	9.0
GM Stockpiles and Borrow areas	244.6
Ore Stockpiles	10.0
Total	666.6



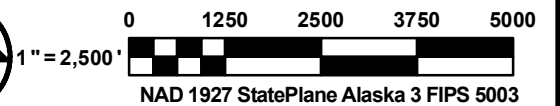
Development Location
Gil Project Reclamation and Closure Plan

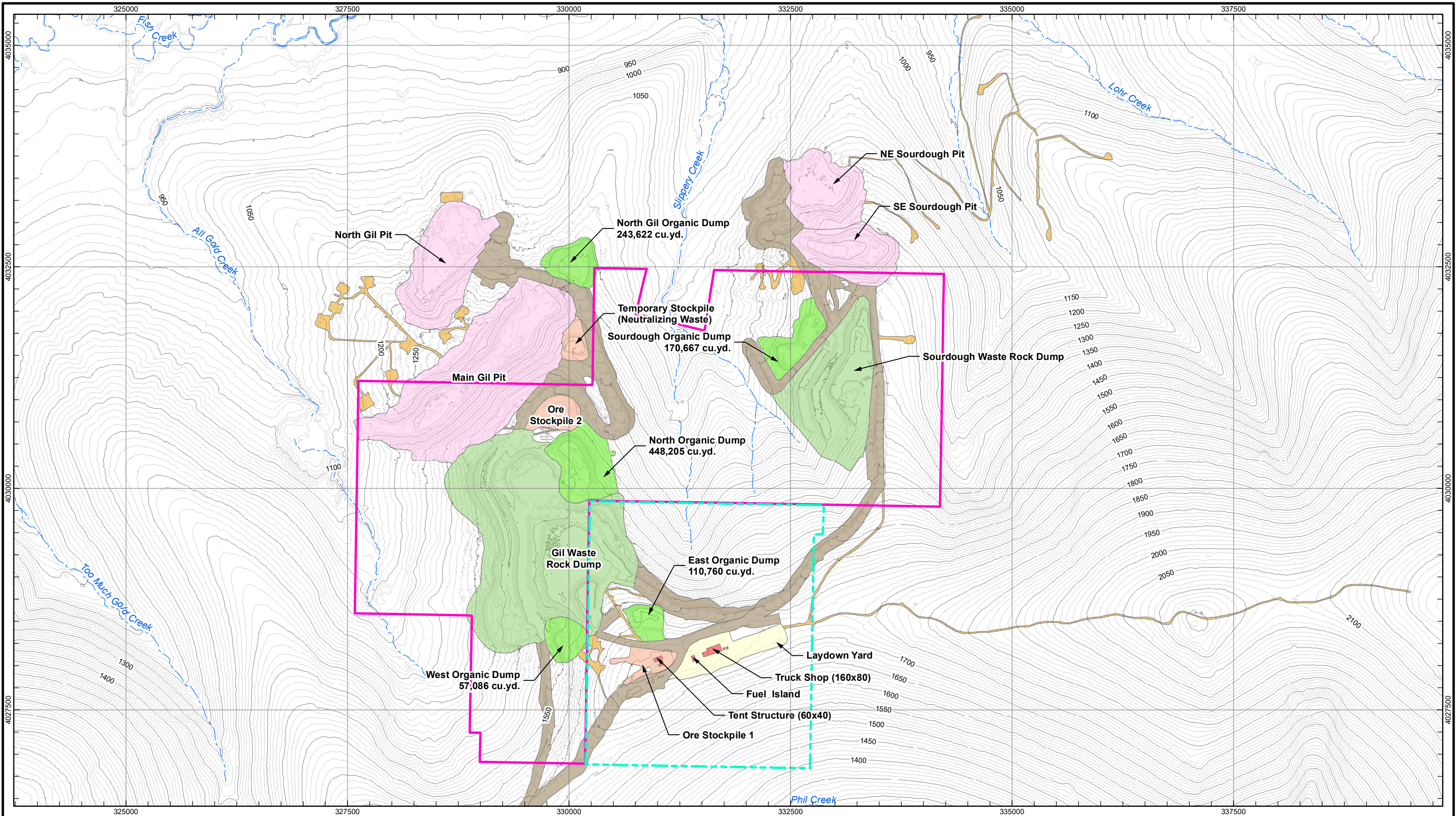
Figure 2-2

Date: February 2026

LEGEND:

- | | | |
|----------------|-------------------------------|-----------------------------------|
| — Contour 50' | ■ Building | ■ Growth Media |
| — Contour 10' | ■ Ore Stockpile | ■ Haul Road |
| - - - Trail | ■ Temporary Non-PAG Stockpile | ■ Access Road |
| — Unpaved Road | ■ Waste Rock Dump | ■ Yard |
| - - - Drainage | ■ Pit | ■ Gil TLO Ground Lease Agreement |
| | | ■ Gil DNR Millsite Lease Boundary |





	General Arrangement Gil Project Reclamation and Closure Plan	LEGEND: --- Drainage Building Ore Stockpile Temporary Non-PAG Stockpile Waste Rock Dump Pit Growth Media Haul Road Access Road Yard Gil TLO Ground Lease Agreement Gil DNR Millsite Lease Boundary	1" = 1,000' NAD 1927 StatePlane Alaska 3 FIPS 5003
	Figure 2-3		
	Date: February 2026		

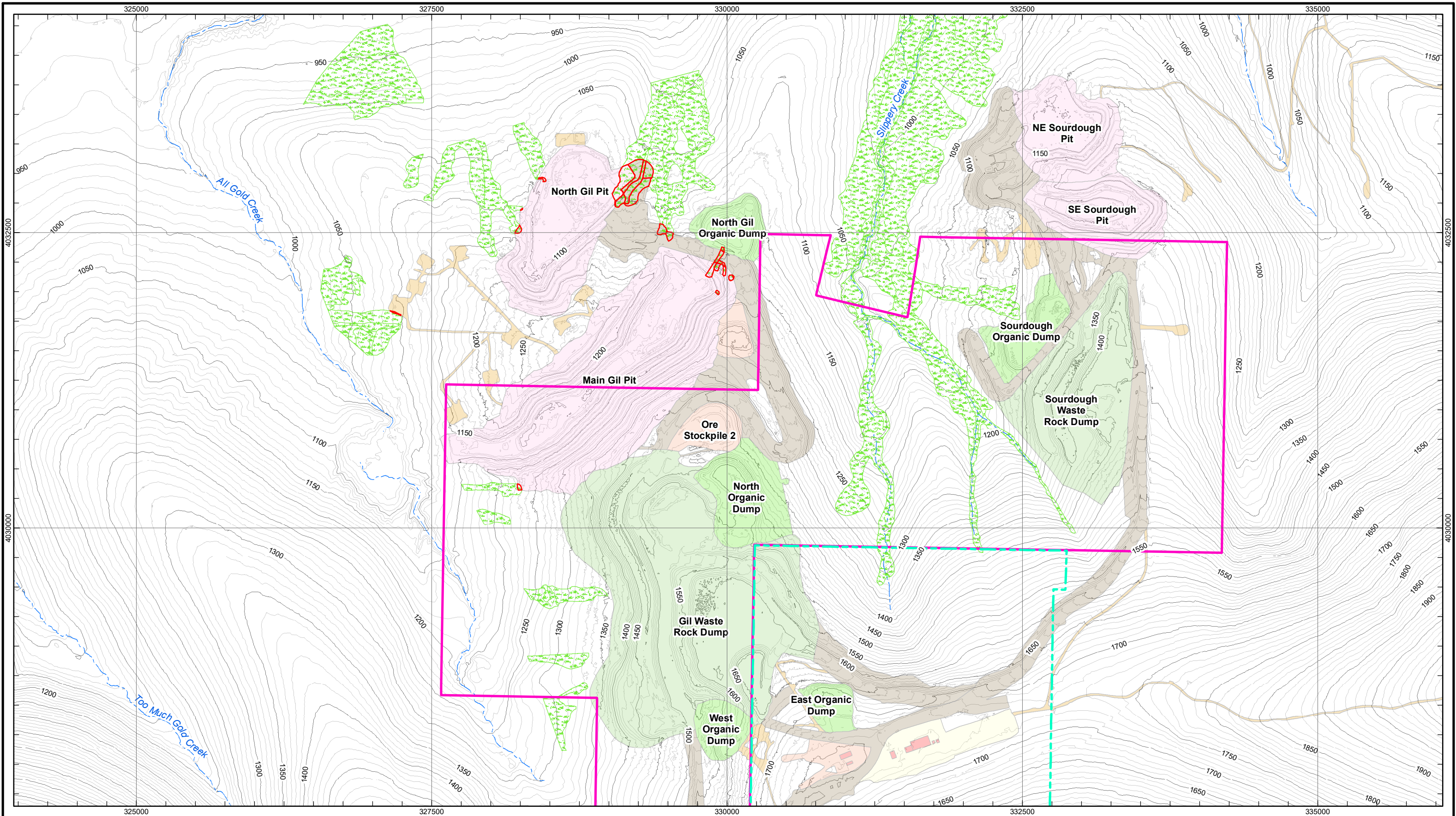
3 WETLANDS

3.1 Department of the Army Section 404 Permit

The original 404 permit POA-1992-574, was issued to Fairbanks Gold Mining Inc. on May 5, 1994. Subsequent modifications have been issued as operational needs, and mine configurations have changed. In 2018, an updated mitigation plan was prepared by Michael Baker International (Michael Baker International, 2018). Subsequent reports were prepared by Stantec (Stantec, 2019, 2021, 2022). The plan details wetlands previously developed and identifies areas available for enhancement, restoration, or creation within the Fish Creek Valley. The latest modifications combine the previous iterations focusing on the Fort Knox Mine with the updated boundaries extending to the Gil Project.

Wetlands have been identified and mapped within the development footprint and the surrounding area. The proposed development avoids and minimizes fill in wetlands to the maximum extent practical. Wetland avoidance within mine pits is unavoidable but minor. Most wetland impacts are due to fill placement for the construction of internal mine haul roads, which also includes temporary work areas. Activities in temporary work areas consist of vegetation clearing to manage stormwater runoff and meet State Water Quality Standards. During reclamation, internal mine roads will be regraded to establish surface drainage, scarified, and seeded.

Figure 3-1 identifies the developed wetlands and proposed wetlands to be created as well as the disturbance and fill limits. Permit modification requests for future disturbances will continue to be submitted to ADNR and the USACE for review and evaluation.



Wetlands
Gil Project Reclamation and Closure Plan

Figure 3-1

Date: February 2026

LEGEND:

- | | | | | |
|----------------|-------------------|-----------------------------|--------------|---------------------------------|
| — Contour 50' | Wetland | Building | Growth Media | Gil TLO Ground Lease Agreement |
| — Contour 10' | Impacted Wetlands | Ore Stockpile | Haul Road | Gil DNR Millsite Lease Boundary |
| - - - Drainage | | Temporary Non-PAG Stockpile | Access Road | |
| | | Waste Rock Dump | Yard | |
| | | Pit | | |



1" = 750'



4 WATER MANAGEMENT

4.1 General

Water management for the Gil Project is anticipated to consist of managing storm water only. Pit dewatering is not required for the development of any of the pits. Seepage and runoff from the waste rock dumps and ore stockpiles, at this time, are not expected to require capture and treatment prior to discharge to the environment.

4.2 Surface Drainage

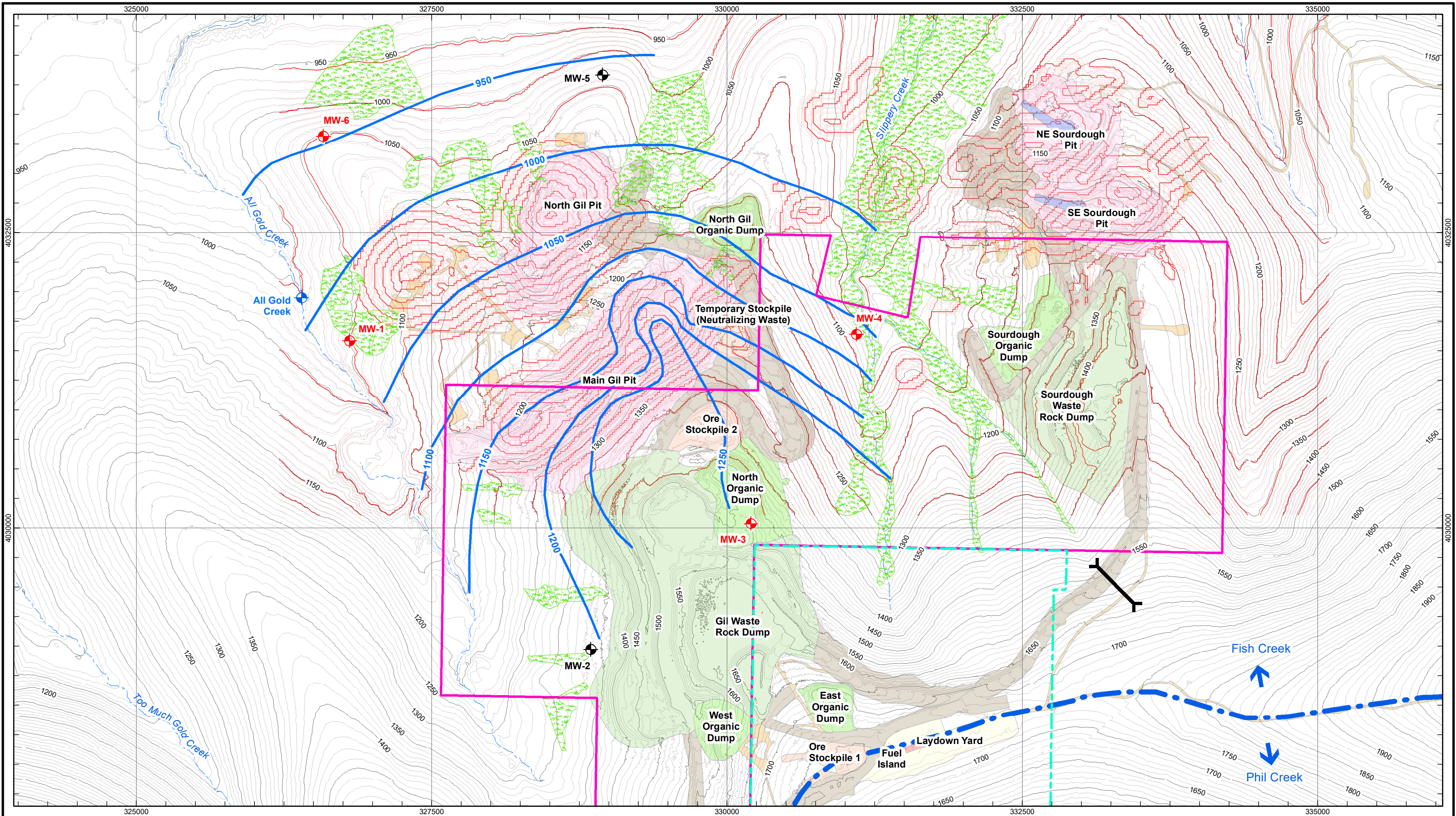
The overall site drainage plan remains unchanged from existing conditions. WRDs will be placed on the crest of two ridgelines, dividing the surface runoff in similar quantities to predevelopment conditions. Runoff will flow into All Gold, Slippery Creeks before discharging into Fish Creek.

Best management practices (BMPs) will be employed during operations and until the site is reclaimed and stabilized to minimize erosion and sediment accumulation downstream. BMPs may include vegetated buffers, sediment collection ponds and sumps, or methods to reduce erosion potential during operations such as temporary grading or seeding. The current operational surface water management concept includes the installation of diversion channels along the downstream boundary of the WRDs and sediment basins located at key points. A riprap-lined swale along the southern groin of the final graded surface of the Gil WRD, within the All Gold watershed, will reduce the erosion potential of existing and reclaimed soils. Runoff generated and collected along this channel is expected to be minor, and erosion potential is expected to be low once vegetation has been reestablished. The WRDs will be graded to minimize concentration of runoff and shed water across a large face, reducing concentration of runoff and thus erosion potential. **Figure 4-1** represents a drainage plan for the reclaimed site.

The pits are not anticipated to collect excess quantities of surface runoff. The Main Gil and North Gil Pits may fill before seeping into fractured bedrock and alluvium, discharging to surface waters downgradient. **Figure 4-1** depicts the potential maximum water surface elevation (WSE) of pit lakes. **Figure 4-2** depicts typical sections through the pits and waste rock dumps.

Geochemical analysis is pending to identify the potential for acid rock drainage (ARD) and metal leaching (ML) of pit walls. If the waste rock and pit walls have low metal leaching and acid rock drainage potential, the runoff from the WRDs and pit walls is not expected to impact water quality or deviate from assumptions of runoff from waste rock included in the 2026 Reclamation Plan (FGMI, 2026). However, pending results of the waste rock analysis, the water management scheme, waste rock storage, and pit water management may be modified to address potential water impairment. The cost for physical reclamation for haul roads and waste rock facilities will likely remain similar, however long-term water management and treatment costs may increase.

A site-wide water balance for the Gil Project is not required, because water is not currently anticipated to require treatment or be used for processing. The treatment assumption will be revisited once the potential for ARD and ML is determined. Water management will focus solely on managing stormwater. Stormwater runoff may be attenuated through sediment basins to reduce suspended solids prior to discharge into the environment on an as needed basis. Discharge locations will be situated in vegetated areas well upstream of any flowing waters or wetlands further reducing potential of sedimentation downstream or impacts to wetlands. No stormwater will be directly discharged into waters of the U.S. without routing through a BMP. After reclamation is complete, runoff and drainage patterns will be restored to similar pre-mining conditions.





Drainage Plan
Gil Project Reclamation and Closure Plan

Figure 4-1

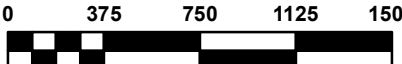
Date: February 2026

LEGEND:

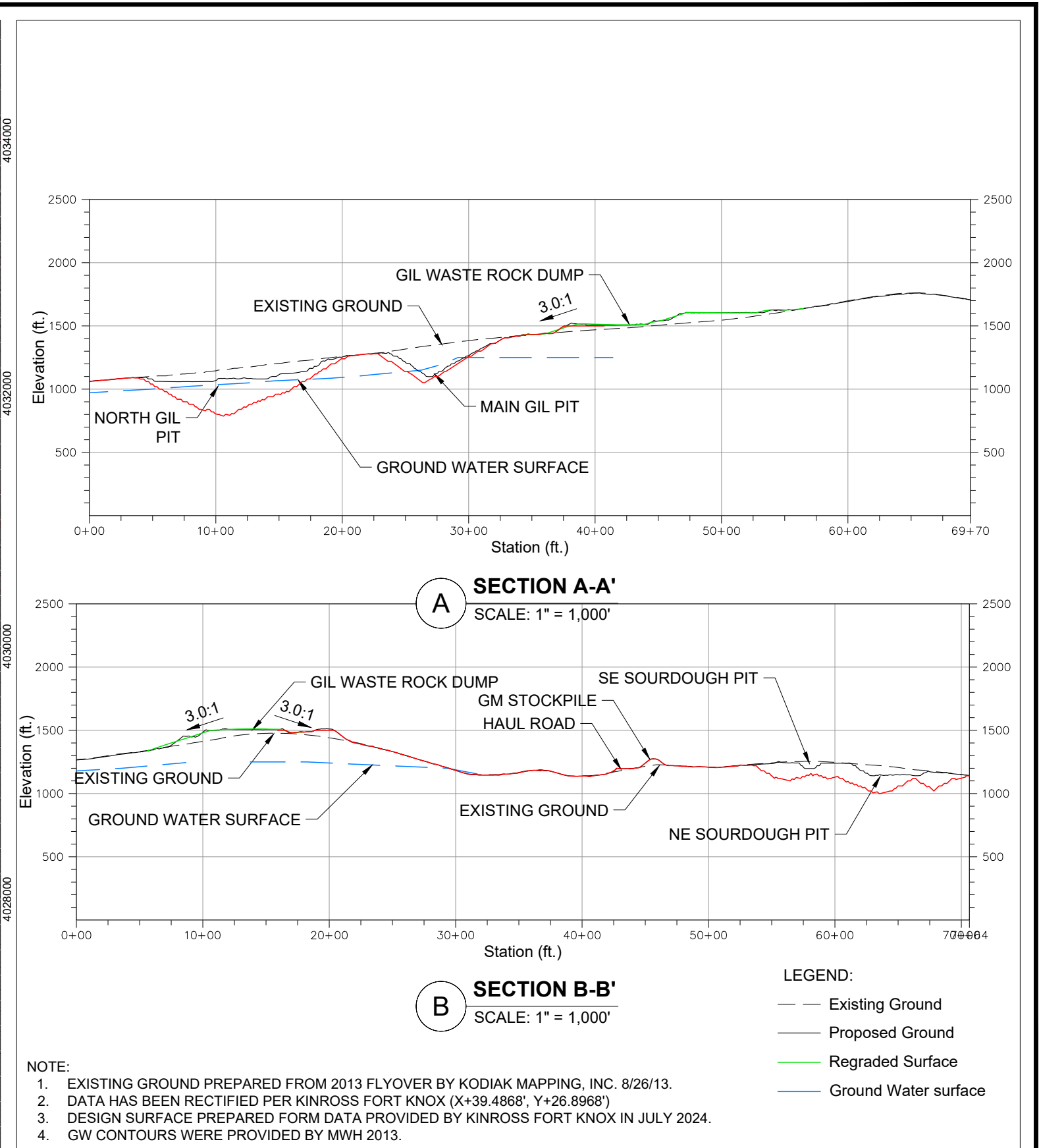
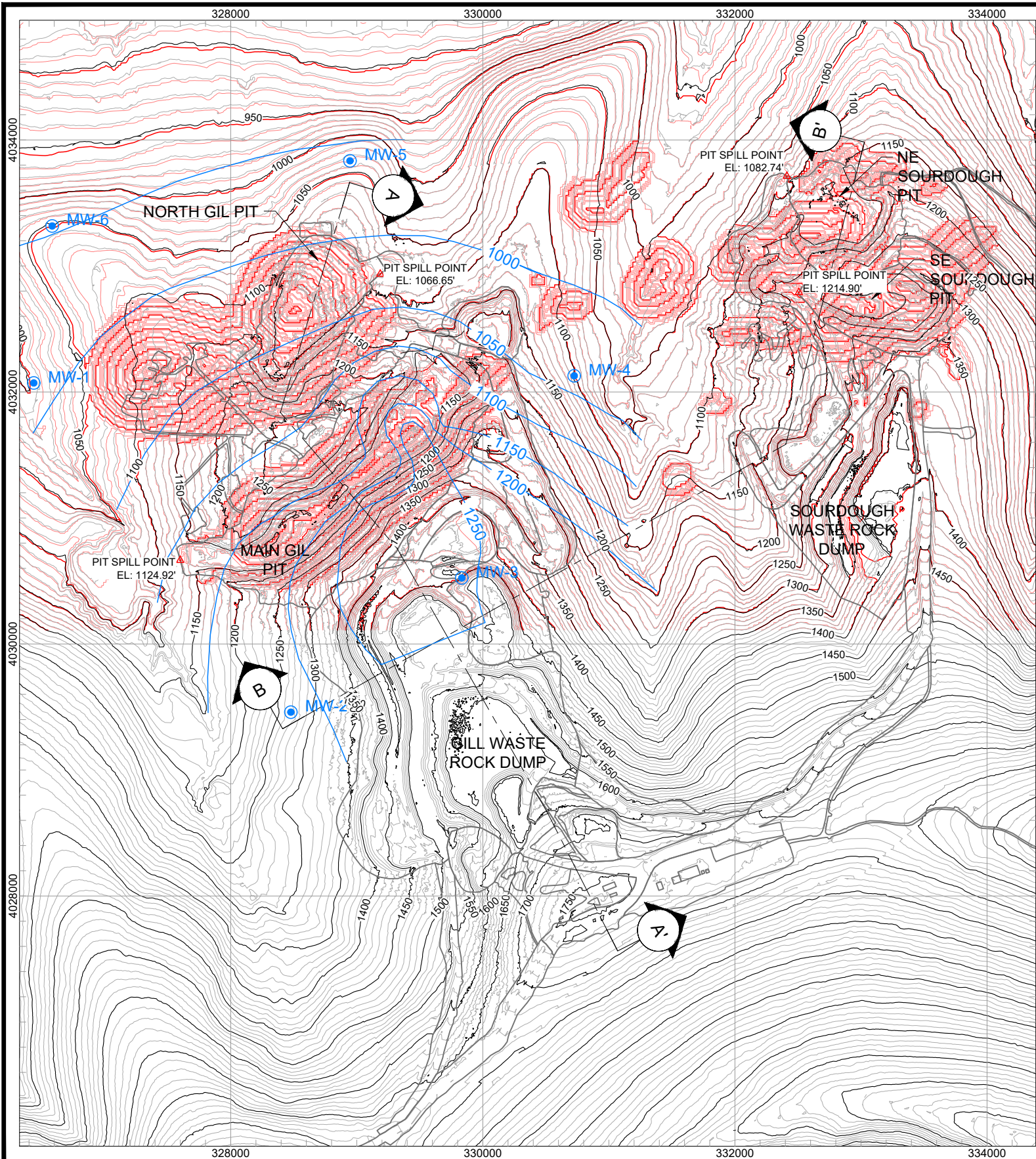
Contour 50'	Building	Growth Media	Wetland
Contour 10'	Ore Stockpile	Haul Road	Conceptual Ground Water Model Contours (SRK, 2023a)
Drainage	Temporary Non-PAG Stockpile	Access Road	Culvert
	Waste Rock Dump	Yard	Abandoned
	Pit	Pit Lake	Surface Sample Location
			Well Sample Location
			Drainage Divide
			Gil TLO Ground Lease Agreement
			Gil DNR Millsite Lease Boundary



1" = 750'



NAD 1927 StatePlane Alaska 3 FIPS 5003



	Typical Sections Gil Project Reclamation and Closure Plan	LEGEND: - Contour 10' - Contour 50' - Ground Water Contour - Monitoring Well - Pit Spill Point	
	Figure 4-2		
	Date: February 2026		

4.3 Pit Lakes

The potential for pit lake formation was estimated using a water balance that considered both groundwater and surface water flows. Groundwater data from monitoring wells located near the Main Gil Pit were used to guide estimates for all pits (**Table 2-1**). The water balance was used to estimate inflow rates and time required to fill the pits.

Inflows into the Main and North Gil pits are expected to include direct precipitation, pit wall runoff, surface runoff, and natural groundwater inflow. The following assumptions were used:

- Average annual precipitation (Arcadis, 2024) - 17.4 inches/year
- Average annual pan evaporation (Arcadis, 2024) - 14.2 inches/year
- Pit wall runoff coefficient - 34 percent of mean annual precipitation (Arcadis, 2024).

Average surface runoff volumes were estimated by applying surface runoff coefficients from the Fort Knox Climate/Hydrologic Characterization Report (KP, 2016) to the catchment areas around the pits. The surface runoff coefficients are as follows:

- Natural ground: 6.0 inches/year
- Disturbed ground: 7.0 inches/year
- Waste rock: 4.0 inches/year

Groundwater inflow was estimated by using the Dupuit–Forchheimer discharge equation (1863), which derives lateral inflow to a fully penetrating feature in an unconfined hydrogeologic setting. The variables listed below were used to calculate groundwater flow rate. **Figure 4-3** graphically represents the input parameters for the equation.

- Hydraulic conductivity (K): 1.2×10^{-8} m/s
- Initial steady state head: 1250 feet
- Head at pit lake: 1125 feet
- Length: 3000 feet
- Recharge: 2.6 in/year

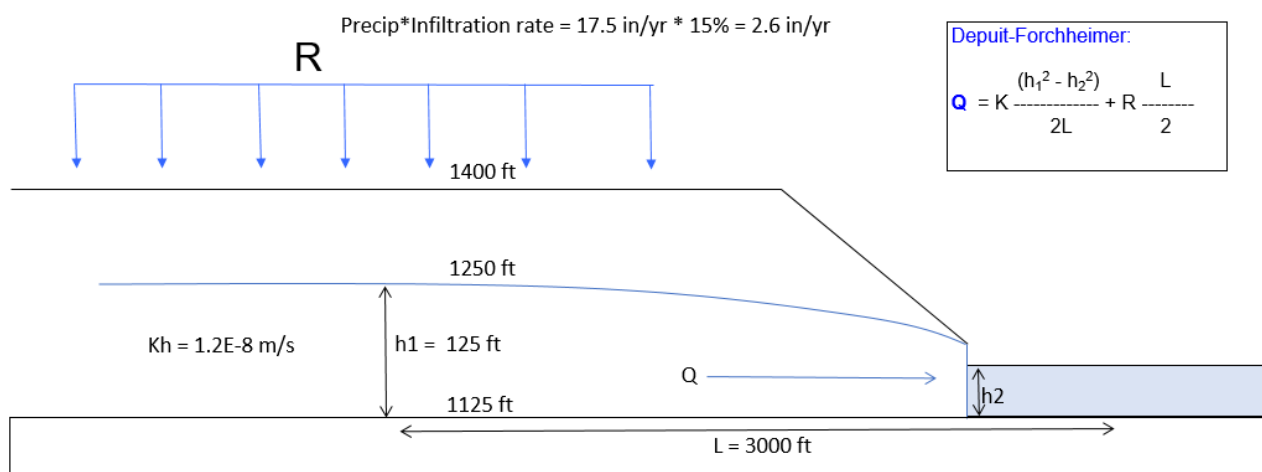


Figure 4-3: Dupuit–Forchheimer - Diagram

The time to fill was estimated by dividing the pit volume at the spill point by the sum of inflows and outflows. **Table 4-1** summarizes results.

Table 4-1: Main and North Gil Pit Water Balance and Time to Fill Summary

Pit	Average Inflows to Pit Lake (gpm)				Outflows (gpm)	Net Flow (gpm)	Pit volume at spill point (acre-ft)	Time to Fill (years)
	Direct Precipitation to Lake	Pit Wall Runoff	Surface Water Runoff	Groundwater Inflow	Pan Evaporation from to Lake			
Main Gil	13.4	7.7	4.4	10.8	-10.6	25.7	396	10
North Gil	5.1	1.7	1.3	3.9	-4.2	7.8	191	15

Estimated groundwater flow rates were low, approximately 10 gpm in the Main Gil Pit, and less than 5 gpm in the North Gil Pit. These low flow rates are attributed to the low saturated bedrock hydraulic conductivity (1.2×10^{-8} m/sec) (KP, 2015). Due to the low hydraulic conductivity of the rock within the pits, the groundwater outflow from a pit lake would be minor, unless major permeable structures are present. Even if such structures are present, they would likely have minor effect in the pit lake volume. Groundwater inflow is sensitive to changes in hydraulic conductivity, but available data suggests that estimated inflows will be primarily influenced by precipitation, runoff, and recharge. Current pit lake modeling indicates that water treatment will not be required in closure.

4.3.1 Main Gil Pit

With the estimated inflows of approximately 25 gpm, the Main Gil pit lake could continue to fill up to the elevation of the west pit wall spill point at 1,165 ft-asml (pit volume of approximately 396 acre-feet). At this point, there is the possibility that the pit lake could flow into the All Gold Creek catchment area. Subsurface groundwater pathways and connections are not fully understood; however, due to low flow rates, seepage through subsurface pathways, rather than overtopping the pit rim, remains a possibility, assuming permafrost is not present near surface. If a pit lake forms in the future, surface outflow is most likely to occur during spring freshet or large storm events. The pit lake water balance calculations indicate that the pit lake will reach the spill point elevation in approximately 10 years.

4.3.2 North Gil Pit

With the estimated inflows of approximately 8 gpm, the North Gil pit lake could continue to fill up to the elevation of the west pit wall spill point at 1,068 ft-asml (pit volume of approximately 191 acre-feet). At this point, there is the possibility that the pit lake could decant and spill over into nearby wetlands, either over the surface or through groundwater pathways. If a pit lake forms in the future, surface outflow is most likely to occur during spring freshet or large storm events. The pit lake water balance calculations indicate that the pit lake will reach the spill point elevation in approximately 15 years.

4.3.3 Sourdough Pits

The Sourdough Pits are similar in the size to the North Gil Pit but have smaller potential pit lake volumes. Inflow conditions are expected to be similar, including direct precipitation, pit wall runoff, and natural groundwater inflow. Surface runoff is expected to be lower in volume compared to the North Gil Pit due to the Sourdough Pits location along the top of a ridge. The time required to fill the Sourdough pits would likely be shorter than for the North Gil Pit, given the smaller pit volume.

below the spill points. Water spilling from the pits would flow towards Slippery Creek or Fish Creek, either over the surface or through groundwater pathways.

4.4 Water Quality

Based on a previous geochemical characterization study completed in 2015, an ICP sulfur concentration greater than 0.3% is indicative of PAG rock (SRK, 2015). Downhole ICP assay data collected to date suggest that the point at which sulfur concentrations in the Project area exceed 0.3% aligns with the modeled redox boundary for the site. As shown in the Leapfrog image below (**Figure 4-4**), the majority of the Main Gil Pit is situated above the modeled redox boundary. This indicates that PAG rock will not be encountered until the base of the Main Gil Pit is mined. This finding is preliminary and will be corroborated by additional geochemical characterization data (i.e., acid base accounting, mineralogy, and additional ICP assay data) which are currently pending. The closure plan will be updated as necessary based on the results of the current geochemical characterization program.

The metal leaching properties of the materials at Gil are currently being evaluated as part of an additional geochemical characterization program. While arsenic is known to be enriched at Gil, the actual leachability of the arsenic remains uncertain at this time. The closure plan will be updated to reflect the results of the geochemical characterization program once they become available. This RCP includes the capture and treatment of all water that is contacted by waste rock, both in-pit and from WRD seepage.

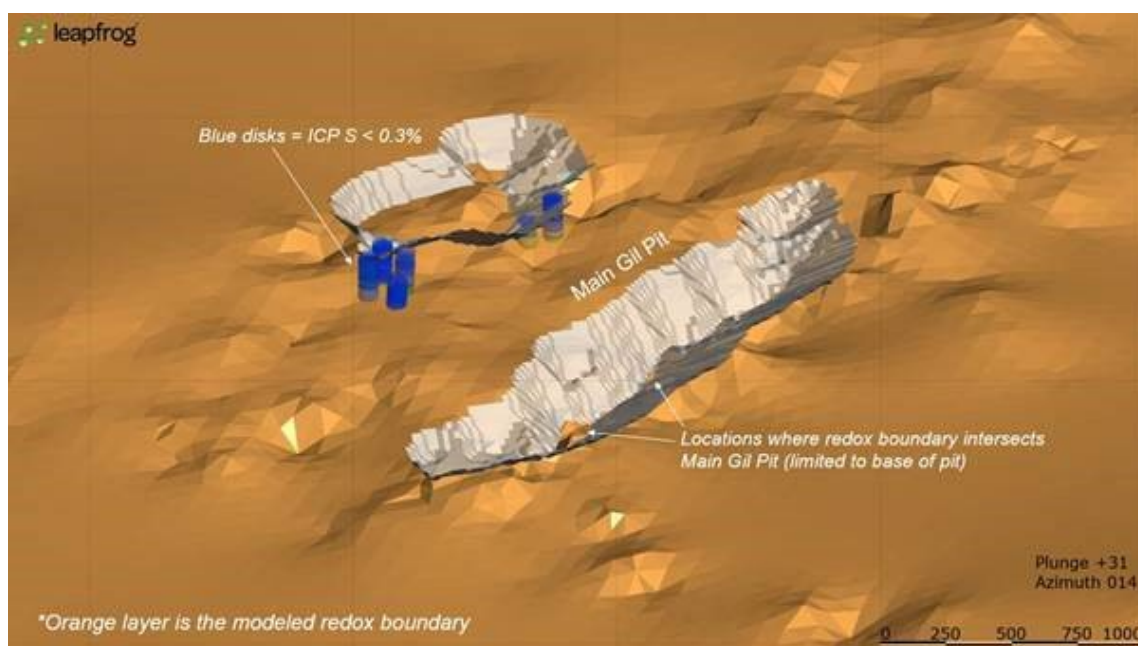


Figure 4-4: Spatial Distribution of ICP Sulfur Results Relative to Modeled Redox in North and Main Gil Pit Shells

5 RECLAMATION PRACTICES

FGMI's long-term goals for reclamation during and after mining and milling operations are to contour, stabilize, and revegetate disturbed areas to return the land to a safe, stable, and productive condition. FGMI is contouring and stabilizing disturbed areas to create ground conditions that promote vegetation development and provide conditions for colonization by native species. Native grass species available commercially are used for rapid soil stabilization.

The objectives of the reclamation and closure plan are:

1. Stabilization and protection of soil materials from wind and water erosion.
2. Stabilization of steep slopes through contouring to create landforms similar to existing terrain.
3. Establishment of long-term, self-sustaining vegetation communities conducive to natural invasion and succession.

FGMI will continue working with ADNR, the Division of Agriculture Plant Materials Center, and the Alaska Department of Fish and Game to achieve the successful implementation and subsequent evaluation of both concurrent and long-term reclamation activities. FGMI considers reclamation to be a progressive process that includes the design, construction, operation, and closure of the mining operation. Reclamation will or has occurred in the following phases, with some overlap:

1. Reclamation completed during and directly after process component construction, including interim reclamation to stabilize and maintain viability of topsoil stockpiles.
2. Reclamation concurrent with mining activities.
3. Active reclamation (Phase I Reclamation defined in Agreement for Funding Post-Reclamation Obligations, February 15, 1994) will begin immediately upon cessation of mining. Final reclamation will include removal of process components, contouring, and placement of growth media unless otherwise approved by ADNR, and revegetation.
4. Passive reclamation (Phase II Reclamation defined in Agreement for Funding Post-Reclamation Obligations, February 15, 1994) will consist of monitoring and maintenance, including water management as necessary, until the reclamation performance standards and the water quality standards established by the Waste Management Permit issued by the Alaska Department of Environmental Conservation are achieved. After water quality standard and revegetation requirements are achieved, the Agreement for Funding Post-Reclamation Obligations (FGMI 2026, Appendix B) will be triggered.

5.1 Schedule of Reclamation Activities

The schedule for reclamation of the Gil Project will proceed concurrently with the reclamation activities at Fort Knox and will not delay the Fort Knox reclamation timeline. The anticipated reclamation schedule for the Gil Project will begin immediately following completion of mining at Fort Knox in mid-2028 and be complete by 2030. To support the five-year permitting cycle, the FA estimate assumes full LOM buildout at Gil by 2031 with closure activities in conjunction with those at Fort Knox. Progressive reclamation at Gil is not considered in the FA estimate schedule. Costs are estimated for all reclamation activities associated with the LOM development. The post reclamation configuration is presented in **Figure 51** and **Figure 52**. The following sections include prescriptions for each facility type or activity. -1-2

5.1.1 Waste Rock Dumps

The Gil and Sourdough WRDs will be graded, contoured, and revegetated. A minimum of one foot of growth media will be applied to the graded and contoured slopes; slopes will be scarified

and seeded for stabilization. Generally, slopes will be graded to a maximum slope of 2.5H:1V or flatter; the design and estimate include slopes at 3H:1V. Water quality of seepage will be monitored during operations.

5.1.2 Pits

Safety berms will be placed around the rim of all pits, and exclusion berms will be constructed at the entrance to all pits. The berms will be constructed from native soils located in proximity or waste rock. Berms made from waste rock will be covered with growth media and seeded as needed. The highwall boundaries will be signed periodically in obvious access locations or areas where the general public could encounter them. Seepage may be collected and/or transferred between pits and conveyed to the North Gil Pit for treatment in the future. **Section 4.3** details seepage water management from the pits.

5.1.3 Haul and Access Roads

Haul roads and access roads will be reclaimed as they become unnecessary for operations. Roads will be recontoured to promote drainage, scarified and seeded. Select roads will remain for long-term use and monitoring activities. Cut and fill slopes will be reduced to a minimum of 2H:1V placing fill material on the road surface to fill in cut slopes. Berms and any water diverting structures and ditches will be removed to reestablished existing drainage patterns. A 24-foot-wide access road will remain along the alignment of the haul roads for monitoring and maintenance activities, where needed. Growth media and organics stockpiled along the perimeter of the roadways during construction will be placed on regraded surfaces. Surplus growth media may be placed along roadways as needed to promote successful revegetation.

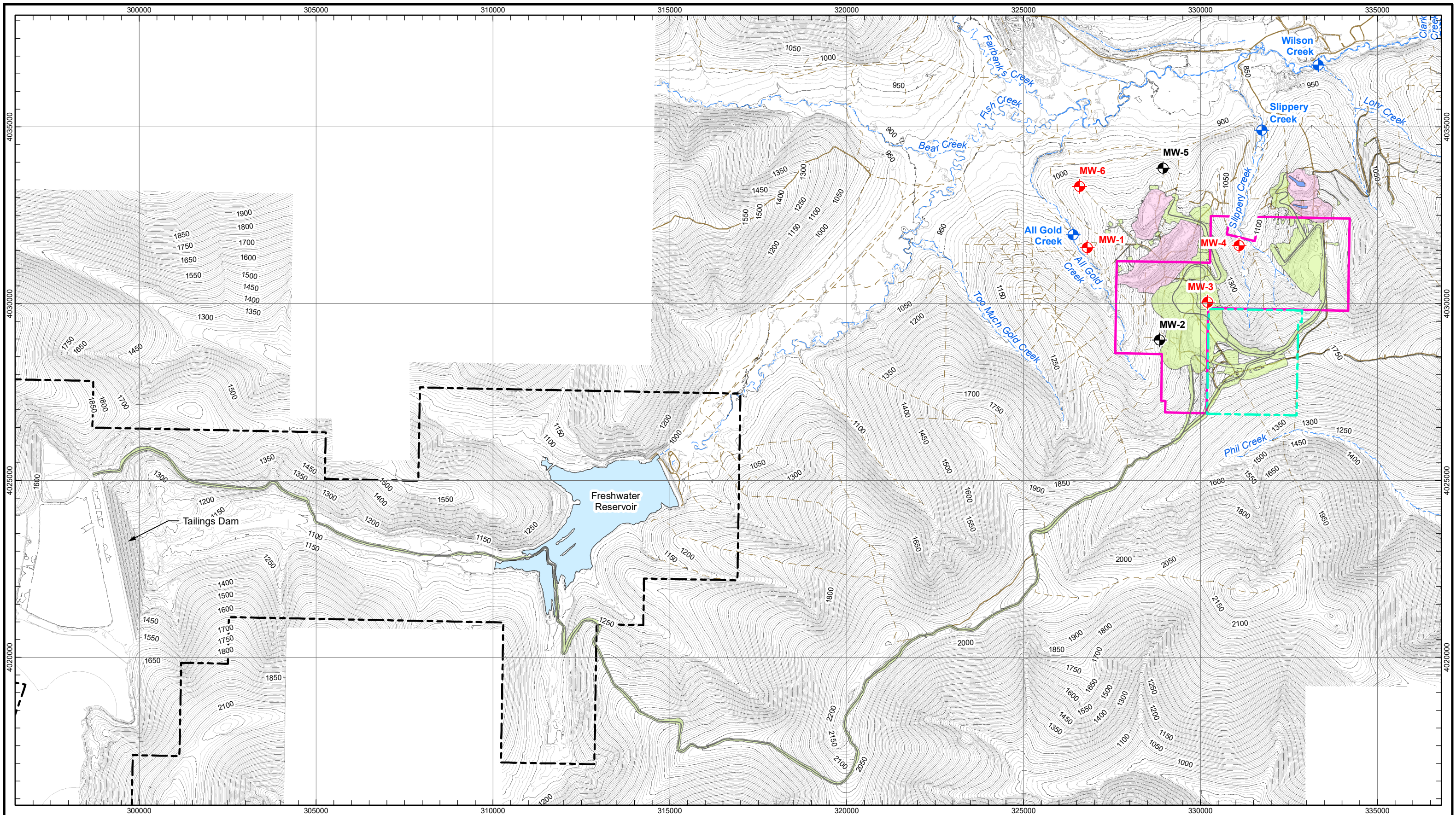
5.1.4 Laydown Yards and Miscellaneous Structures

Laydown yards and stockpiles footprints will be regraded as needed to provide positive drainage and prevent ponding. The areas will be scarified and seeded. Erosion and sediment control structures such as temporary diversion channels and sediment collection ponds will be breached, regraded, scarified, and seeded once all upstream surfaces have been stabilized with vegetation. The laydown yard will be regraded to provide positive drainage. Twelve inches of growth media will be placed, scarified, and seeded. Surplus growth media may be placed in other miscellaneous areas as needed to promote successful revegetation.

All temporary structures, foundations, fuel islands, and any equipment will be removed from the project area, disposed of properly, or buried in an approved landfill. The FA estimate assumes this landfill will be located at the toe of the Fish Creek Waste Rock Dump at Fort Knox. Building foundations, slabs, and footers will be broken and buried in place, not taken to the landfill.

5.1.5 Ore Stockpile Pads

The ore stockpiles will be reclaimed when no longer needed for mining activities. Any structures constructed on the stockpiles will be removed and disposed of properly or buried in an approved landfill. Any remaining ore will be hauled to the mill at Fort Knox for processing or placed on one of the WRDs and reclaimed accordingly. The pads will be regraded to provide positive drainage. Twelve inches of growth media will be placed, scarified, and seeded. Reclamation of the ore stockpile pads will be concurrent with haul road reclamation or before.





Post-Reclamation - Area Wide
Gil Project Reclamation and Closure Plan

Figure 5-1

Date: February 2026

LEGEND:

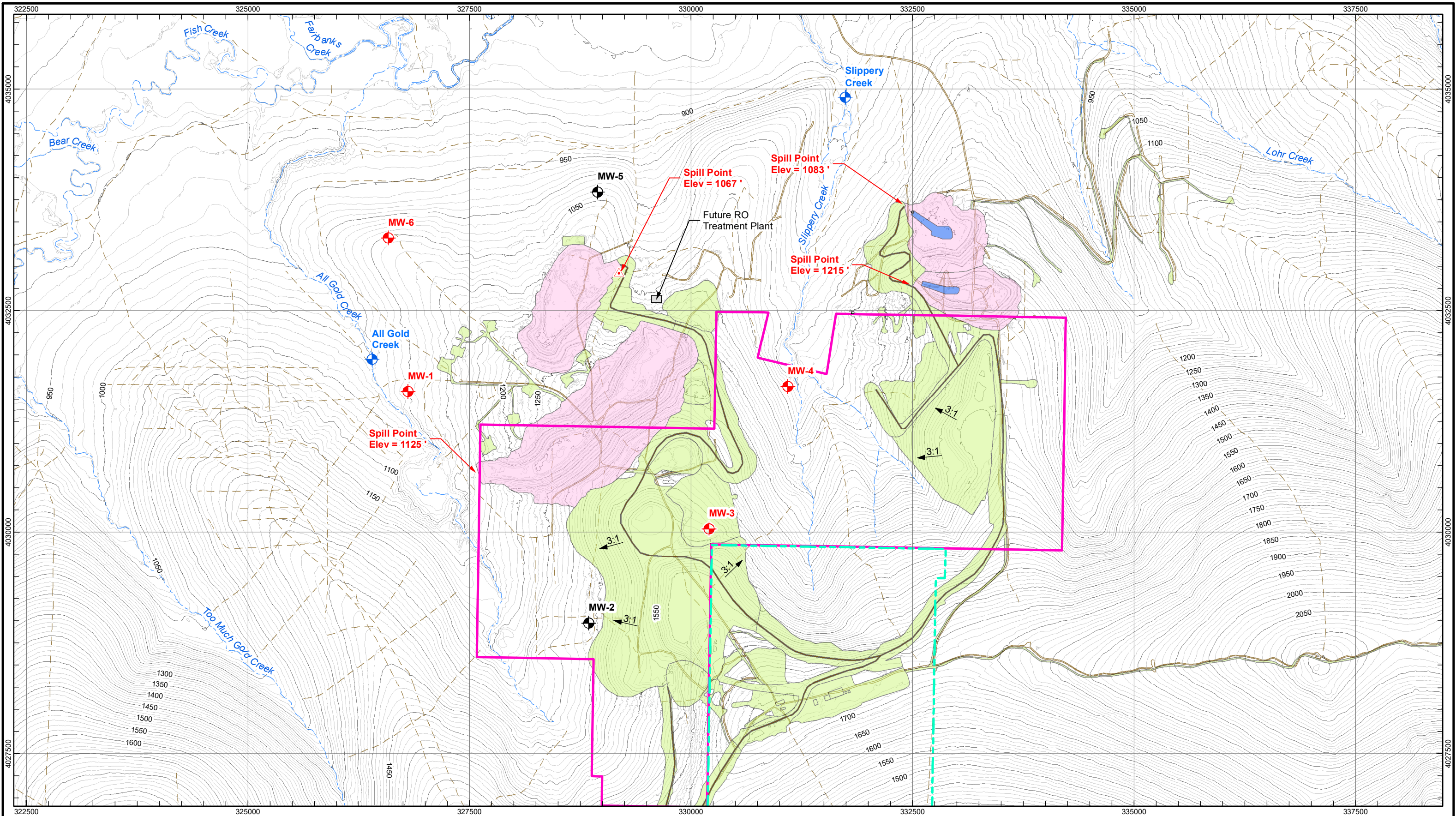
— Contour 50'	Revegetated Areas	Abandoned	FGMI
— Contour 10'	Pit	Surface Sample Location	Gil TLO Ground Lease Agreement
— Trail	Maximum Potential WSE	Well Sample Location	Gil DNR Millsite Lease Boundary
— Unpaved Road	Access Roads to Remain		
- - - Drainage			



1" = 2,500'



NAD 1927 StatePlane Alaska 3 FIPS 5003





Post-Reclamation - Project Area
Gil Project Reclamation and Closure Plan

Figure 5-2

Date: February 2026

LEGEND:

Contour 50'	Access Roads to Remain	Abandoned	Gil TLO Ground Lease Agreement
Contour 10'	Revegetated Areas	Surface Sample Location	Gil DNR Millsite Lease Boundary
Trail	Pit	Well Sample Location	
Unpaved Road		Pit Spill Point	
Drainage			

N

1" = 1,000'

0 500 1000 1500 2000

NAD 1927 StatePlane Alaska 3 FIPS 5003

5.2 General Reclamation Procedures

The primary components in reclamation for the Gil Project include earthwork, growth media placement, seedbed preparation, fertilizing, seeding, and monitoring. FGMI will manage these components keeping in mind that the goal is to achieve a stable, revegetated post-mining land surface that will promote natural invasion by native plants. FGMI will continue to work in coordination with the Alaska Department of Fish and Game (ADF&G), Habitat Section, to develop and enhance the fish and wildlife potential throughout the project area.

5.2.1 Earthwork

Waste rock dumps will require substantial grading, contouring, and revegetation. Other disturbed areas will also be revegetated, with some potentially requiring regrading. Growth media will be applied if initial revegetation efforts are not successful. Generally, slopes will be graded to 2.5H:1V or flatter. For the purposes of FA calculations, a slope of 3H:1V are considered, providing a more conservative estimate of earthwork volumes.

Earthwork will utilize heavy equipment standard to the industry and readily available to FGMI. It is anticipated that the equipment list will include (or equivalents thereof): Caterpillar D10, D9, D8, rubber-tired scrapers, water trucks, and motor graders. Additional equipment such as (but not limited to) front-end loaders, track-mounted and tire-mounted backhoes, and haul trucks, may be substituted for or incorporated as needed. The equipment list will remain dynamic to accommodate specific conditions and requirements during implementation of the plan.

5.2.2 Control of Sedimentation

Implementation of BMPs to control erosion during active mining will aim to minimize re-disturbance during reclamation. The BMPs will be consistent with measures and practices identified in Alaska Department of Environmental Conservation's *Alaska Storm Water Guide* (ADEC, 2024).

Temporary sediment and erosion control devices will be maintained until the site-specific potential for erosion is minimized through earthwork or revegetation. Their removal will be determined by field conditions.

5.2.3 Growth Media

"Growth media" is defined herein as any material with the physical and chemical properties necessary to germinate and sustain vegetation growth with or without amendments. At the Gil Project site, the term "growth media" is used interchangeable with the terms "topsoil" and "overburden". Overburden material suitable for use as growth media refers to the unconsolidated material located between the topsoil horizons (where present) and the bedrock, which exhibits no chemical characteristics that would inhibit vegetation development.

Prior to construction of the Gil, North Gil, and Sourdough facilities (pits and WRDs), suitable growth media was stripped in advance and stockpiled in one of five growth media (GM) stockpiles for later use during reclamation. It is anticipated that a minimum of one foot of growth media will be stripped within the footprint of the proposed development for each of the WRDs. The volumes indicated in

Table 5-1 are estimated either by multiplying the stripping depth with the two-dimensional (2D) area or based on dimensions computed from surveys of stockpiles.

The SRCE model computes a three-dimensional (3D) slope volume for covers and growth media after grading is complete. The 3D slope volume for surfaces with slopes ranging from 2.5-3H:1V is generally 5-7% more than a 2D volume, depending on WRD slope and final configuration. A

detailed summary of the growth media volume required for reclamation calculated using SRCE compared to the volumes of growth media stockpiled and available is found in

Table 5-1. Growth media stockpiles and borrow areas exceed the calculated volumes required for reclamation. Surplus GM stockpiles will be regraded, scarified, and seeded in place, or distributed over other areas of the site to enhance revegetation success.

Table 5-1: Estimated Growth Media Inventory and Estimated Volume Requirements

Source	Gil GM Inventory (2024) (CY)	Facility Placement	SRCE GM Volume (CY)
Gil GM 1 – Sourdough Organic Dump	170,667	Gil WRD	137,972
Gil GM 2 – East Organic Dump	110,760	Gil Sourdough WRD	48,885
Gil GM 3 – West Organic Dump	57,086	Gil Laydown Yards and Temp. Stockpile	29,750
Gil GM 4 – North Organic Dump	448,205	--	--
Gil GM 5 – North Gil Organic Dump (Current Stockpile)	243,622	--	--
Total Current Stockpile	582,135	Estimated GM Required	216,607
GM Surplus			365,528

Note: See User Sheet 13 in SRCE model. Fort_Knox_Gil_2024-FA_SRCE_USPR001941_20260220

5.2.4 Seedbed Preparation

Mine and mine related disturbances can result in compacted surfaces that are unsuitable for revegetation. Therefore, preparation of a seedbed suitable for plant germination and growth can be a critical task in any successful land reclamation project.

At Gil, the general method for seedbed preparation will be ripping or scarifying on the contour to a depth of 12 to 18 inches deep using a D8, D9, or D10 CAT (or equivalent) equipped with a 2 or 3-shank ripper. The FA accounts for the use of a D10 CAT.

Ripping will occur along the contours of sloped areas to promote erosion control, in addition to creating a suitable seedbed. The specific site will be prepared for seeding by ripping on the contour to roughen the surface. A broken, roughened surface will help trap moisture, reduce wind shear, minimize surface erosion by increasing infiltration, and create micro-habitats conducive to seed germination and development.

5.2.5 Fertilizer and Fertilization

Prepared seedbeds will be fertilized either prior to, after, or during the seeding operation. Specific fertilization requirements will depend on the quality of growth media used. Growth media will be tested for standard soil agricultural constituents such as nitrogen, phosphorus, and potassium. Based on available field-testing and soil test results at Gil, the general recommended rate of fertilizer application will range from 100 to 300 pounds per acre of 20N-20P-10K for spring seeding or 10N-20P-10K for fall seeding. The FA accounts for 300 pounds per acre and the spring fertilizer ratio. Final fertilizer and application rates for the tailings will consider information acquired from current reclamation and soil tests.

5.2.6 Seed and Seeding

The grass seed mix presently used at the Gil Project is listed in **Table 5-2**. The primary purpose of this seed mix is to achieve quick vegetative cover that will help minimize soil erosion. For species that may be considered in the future for revegetation include Silverberry, Lupin, Oxytropis, Wild Sweet Pea, Sweetbroom, Burnet, Siberian Aster, Goldenrod, Alpine Milk Vetch, Wild Sage, Dragonshead Mint, and Wild Rhubarb. However, these varieties are not currently available commercially, and a commercial source must be located if they are to be incorporated in the seeding mix. The seed mix may change over time in response to such factors as internal and external research results, changes in technology, changes in land management philosophy, and commercial availability. Native species will be the preferred mix. However, other species may be used in some years due to availability or if deemed to better meet the post-mining land use criteria and are approved by ADNR.

Table 5-2: Seed Mix

Seed Type	Mix %
Arctared Fescue	50%
Gruening Alpine Bluegrass	20%
Tundra Glaucous Bluegrass	20%
Nortran Tufted Hairgrass	10%

Seeding will be accomplished using broadcast methods that may include but not be limited to hand broadcasting, dozer or off-road vehicle mounted broadcasting, and aerial broadcast application. The application rate for broadcast seeding using the presently proposed grass seed mix will be 40 pounds of pure live seed per acre. The rate has been reduced based on successful results of revegetation efforts at True North and discussions with the Plant Materials Center. The need for mulch application will be evaluated if seed germination becomes a limiting factor in the reestablishment of vegetation.

5.2.7 Revegetation Timing

Seeding will be conducted as soon as possible following seedbed preparation. Ground conditions suitable for large-scale earthwork occur primarily during the spring and summer months. Research and experience with concurrent reclamation will be used to evaluate the potential of dormant seeding. Generally, seeding is implemented after spring break up until mid-July. Such seeding allows the seed to take advantage of the summer moisture period. However, actual experience has shown that all seedbed preparation on large-scale mine reclamation projects cannot and does not occur at one point in time. Thus, while every effort will be made to conduct the majority of seeding after spring breakup and before mid-July, seeding actually may occur during spring, summer, or fall. If a seeding is unsuccessful for any reason, the area will be reseeded the following year.

5.2.8 Gil Vegetative Restoration Studies

FGMI currently uses a native grass seed mix ratio, seed application rate and fertilizer rate recommended by the Plant Materials Center with approval from ADNR. The grass mix was developed during the construction of the wetlands below the tailings impoundment and is still being used for concurrent reclamation projects. Planting of dormant willow cuttings and encouraging the natural invasion of adjacent native species are methods used in the past to

promote species diversity. However, an increase in plant species diversity was recommended to improve the wildlife habitat surrounding the developed wetlands in the environmental audit of 2003 (Golder, 2004). Opportunities to increase species diversity in all areas of the mine site will continue to be pursued.

5.2.9 Revegetation Cover Criteria

A vegetative cover criterion of 70% will be achieved prior to requesting final release of FA for each reclaimed area. The 70% vegetative cover criteria shall be determined a minimum of three years after the last application of topsoil, seed, fertilizer, or any water in addition to natural precipitation. A method approved by ADNR will be used to determine percent cover. The 70% cover criteria may be waived upon the concurrence of ADNR or the landowner for specific areas that are deemed stable, have minimal potential to adversely impact surface water quality, and are consistent with the post mining land use.

For an unsuccessful seeding event, FGMI will implement appropriate action, which could include reseeding the area, fertilization, and/or placement of growth media on the site.

5.3 Final Reclamation Topography

Disturbed areas will be regraded and resloped to promote drainage and maintain consistency with the surrounding natural topography. **Figure 5-2** illustrates the conceptual topography after reclamation occurs. The post-reclamation topography consists of a rolling landform which blends with the hills along the south and north sides of Fish Creek. The creation of open water areas within the pit, developed wetlands in the Fish Creek Valley, and revegetated upland landforms will diversify the post-mining topography and habitat.

5.4 Public Access

Public access to the Gil Project site will be restricted until both reclamation and closure are complete after which public access to the site will be managed and maintained by the Alaska Department of Transportation and Public Facilities. Roads to be left in place following completion of reclamation will be determined by FGMI and ADNR.

Public safety is a principal concern in closure and reclamation of mining operations. The Gil pit highwall safety berms will remain in place to restrict access to the pit areas. Generally, berms 4-6 feet in height will be utilized to restrict access to the steeper highwall sections of the pit and other potentially hazardous areas. Signs will be posted every 500 feet to provide additional warning of potentially hazardous areas.

5.5 Financial Assurance Release

FGMI will submit a request for partial bond release of the reclamation financial assurance once reclamation is complete and the site is considered stabilized. FGMI utilizes the SRCE Model, to calculate the FA for reclamation activities. Successful reclamation interpretation comes from Article 02 Reclamation Performance Standards 11 AAC 97.200. The FA SRCE model for Gil is included in the FA SRCE model for Fort Knox referenced in the latest Fort Knox RCP (FGMI, 2026). Refer to Section 8 (FGMI, 2026) for more details on the combined FA calculations.

6 FACILITY SPECIFIC RECLAMATION AND CLOSURE

6.1 Waste Rock Dumps

Reclamation of waste rock dumps will be initiated once they are no longer required for waste rock disposal. WRDs at Gil will remain under care and maintenance while the site is under temporary closure, and reclamation will begin once mining ends in 2038. Reclamation of WRDs at Gil is scheduled to continue until 2030. The area calculated for FA and regrading volume is based on current life of mine plans. The SRCE model estimates the waste rock dumps cover approximately 110.6 acres.

Reclamation of the waste rock dumps includes recontouring and growth media placement. The crests of the waste rock dumps will be rounded with material pushed outward to establish a slope of approximately 2.5H:1V or flatter (FA calculations use a final slope of 3H:1V). Large boulders that are uncovered during sloping may be left on the surface to provide topographic diversity, microhabitats for wildlife and vegetation, and to break the linear appearance of the final slope. Growth media will be placed at a depth (assumed 12 inches) which will promote successful revegetation.

When final sloping, contouring, and growth media placement have been completed, waste rock dumps will be ripped along the contour. Contour ripping will reduce the erosion potential by reducing smooth slope length with the series of furrows created that will also increase infiltration. Ripping on the contour will provide micro-habitats for increased moisture retention and seed germination. Long slopes may need to be re-dressed periodically during revegetation to reduce runoff rill and erosion. Wattles, sediment control blankets, or other forms of soil stabilization may be required in problematic areas as vegetation is established. Brush berms and/or sedimentation berms will be constructed at the toe of dumps where feasible to reduce sediment transport.

Waste rock dumps will be revegetated following completion of earthwork. Due to the rocky, irregular nature of the final slopes, broadcast-seeding (by hand, equipment, or aerial) methods will be utilized. Seed and fertilizer will be applied as discussed in **Section 5.2** General Reclamation Procedures.

6.2 Building and Equipment Sites

Buildings will be selectively demolished as they are no longer needed for operation. As facility components of the site are decommissioned, materials, equipment, and some buildings will be removed, and the building structures demolished and deposited in an approved landfill. Equipment and piping not needed for the reclamation and monitoring process will be utilized at another mining site, sold, salvaged, or disposed in an approved manner. Past experience indicates that most equipment will be either utilized at other facilities or sold.

Reclamation of building and equipment sites outside FGMI surface ownership areas will follow procedures as previously outlined. Sites will be graded for proper drainage, ripped, and scarified, and revegetated. Reclamation of the building and equipment sites will include placement of growth media where necessary to support vegetation and revegetation. Sites will be revegetated following procedures previously outlined.

6.3 Petroleum Aboveground Storage Tanks

At time of the mine's closure, FGMI will investigate Gil's petroleum aboveground storage tanks for spills and leakage. Appropriate investigation will be performed to determine whether spills or leakage have occurred at the gasoline and diesel storage tank locations. Investigation activities will include visual observations, and if necessary, soil sampling will be performed for benzene, toluene, ethyl benzene, and xylene (BTEX) at gasoline storage tank area(s) and diesel range organics for diesel storage tank areas. Other petroleum storage tank areas will be investigated

based upon the tank(s) constituents. Appropriate actions and cleanup will be taken based upon investigation activities.

6.4 Well Closure

All wells existing at the time of closure will be plugged and decommissioned when no longer required. **Figure 7-1** shows current locations of existing monitoring wells. The FA calculations assume the current number of wells will be maintained throughout operations but understand that wells may be installed and decommissioned throughout operations. Well decommissioning will be conducted according to ADEC regulations (18 AAC 80.015) in effect for all wells at the time of decommissioning.

Decommissioning procedures will include:

1. Removal of pumps and piping
2. Plugging of the well with an approved sealing material at total depth
3. Removal of the collar
4. Minor grading around the well site
5. Revegetation

6.5 Roads

The roads to be reclaimed will be determined by FGMI and ADNR. For purpose of this reclamation plan, FGMI has assumed the following:

1. Access to the mine, pit and monitoring locations will be provided via service roads. These roads will consist of the Gil Access Road and any service roads deemed necessary for monitoring. These permanent roads and access roads are illustrated in **Figure 5-1** and **Figure 5-2**.
2. Reclamation procedures will be similar for all types of roads that are to be reclaimed. Culverts will be removed (as needed); natural drainage paths restored or stabilized, and roadbeds will be graded where necessary to provide adequate drainage. Following grading, roadbeds will be scarified/ripped and revegetated. Any suitable material located within proximity to the road embankment or on the embankment (i.e., safety berms) will be used for growth media. Check dams to manage surface runoff and control erosion, and berms to restrict human access will be incorporated where necessary to prevent runoff from concentrating along the length of the roadways.

6.6 Growth Media Stockpiles

Reclamation activity will include relocating GM from stockpiles to selected locations as needed for revegetation. All stockpile areas will be resloped to promote drainage, scarified and revegetated, regardless of inventories remaining. Surplus material shall be inventoried, physical locations indicated with marker signs and volumes documented for future use in reclamation maintenance activities. **Figure 2-3** illustrates the locations of GM stockpiles.

7 MONITORING

Monitoring for the Gil Project site will be done in the same intervals as stated in the 2023 Fort Knox Monitoring Plan (FGMI 2023). Monitoring for the Gil Project will include:

1. Water quality sampling procedures and analytical profiles and sampling schedules;
2. Characterization of acid rock drainage;
3. Monitoring of solid waste landfills;
4. Potable water monitoring requirements;
5. Wildlife mortality reporting procedures;
6. Documentation, record keeping and reporting requirements; and
7. Quality assurance/quality control manual.

The closure monitoring plan will include water quality sampling, groundwater level measurements, and evaluation of the success of revegetation. The frequency of sampling events will be adjusted as appropriate between the reclamation and closure, and post-closure phases based on measured improvements in water quality. **Table 7-1** summarizes the monitoring program, with current monitoring points shown on **Figure 7-1**.

During the closure process, groundwater quality will continue to be assessed at the existing monitoring wells.

Table 7-1: Gil Monitoring Points

Monitoring Point	Frequency	Parameter
Compliance Well	Monthly	Indicator
Surface Water Compliance Point	Annual	Complete

Groundwater Level Monitoring

Groundwater levels will be monitored in the monitoring wells on a quarterly basis. The following wells will be monitored: MW-1, MW-3, MW-4, and MW-6.

Surface Water Monitoring

Surface waters will be monitored during operations and after reclamation has been complete. The following surface water points will be monitored: Slippery Creek, All Gold Creek, Lower Fish Creek, Clark Creek, and Wilson Creek.

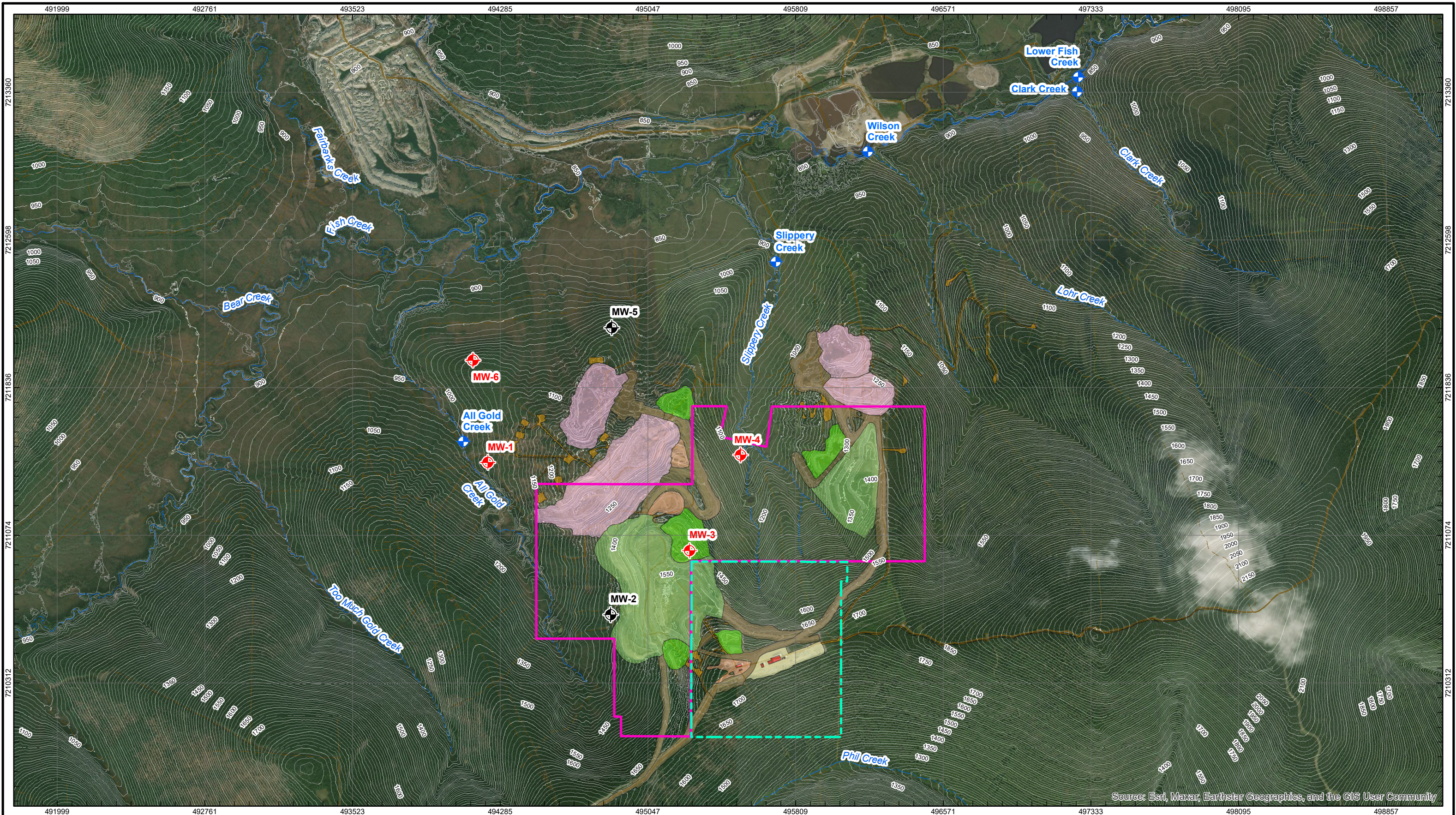
Inspection of Surface Stabilization

Visual observation of revegetation success will be performed on an annual basis during the pre-stabilization phase. Inspection for erosion and formation of gullies will be completed quarterly.

7.1 Post Reclamation Maintenance

Once physical reclamation has started, temporary diversions and sedimentation control systems will be regularly monitored by FGMI personnel. These systems will be cleaned, repaired, and altered as necessary. Long-term or permanent diversions and the signage will be monitored and maintained as needed until the FA is released.

Success of reclamation will be assessed through visual observation to identify erosion problems. Remedial actions to address instability will be implemented as soon as feasible following detection of significant erosion or loss of growth media. Vegetation success will be evaluated qualitatively by visual inspection on an on-going basis by FGMI and ADNR personnel. When warranted, quantitative data will be collected. Quantitative analyses will be conducted late in the growing season (August).



Source: Esri, Maxar, Earthstar Geographics, and the GIS User Community

Gil Monitoring Locations
Gil Project Reclamation and Closure Plan

Figure 7-1

Date: February 2026

LEGEND:

Contour 50'	Building	Growth Media	Abandoned	Gil TLO Ground Lease Agreement
Contour 10'	Ore Stockpile	Haul Road	Surface Sample Location	Gil DNR Millsite Lease Boundary
Trail	Temporary Non-PAG Stockpile	Access Road	Well Sample Location	
Unpaved Road	Waste Rock Dump	Yard		
Drainage	Pit			

1" = 1,500'

NAD 1983 UTM Zone 6N

8 ESTIMATE OF RECLAMATION AND CLOSURE COSTS

The FA model is calculated using a Standardized Reclamation Cost Estimator (SRCE) model. The FA for Gil is included in the FA SRCE model for Fort Knox. Refer to the Fort Knox and Gil Reclamation and Closure Plan – Basis of Estimate for the SRCE model containing the Financial Assurance costs for both Fort Knox and Gil, included as Appendix H of the Fort Knox Reclamation and Closure Plan (FGMI, 2026).

9 REFERENCES

Alaska Department of Natural Resources (ADNR), Alaska Water Quality Criteria Manual for Toxic and Other Deleterious Organic and Inorganic Substances, As Amended Through December 12, 2008

Alaska Department of Environmental Conservation, 2024, Alaska Storm Water Guide (Updated April 2024), <https://dec.alaska.gov/water/wastewater/stormwater/resources/guidance/>.

America North Inc., 1992. Fort Knox Gold Project, Environmental Baseline Report, Volume 1. America North Inc., Fairbanks, Alaska.

Arcadis, 2024. Fort Knox Pit Lake Evaluation, 2023 Update, Arcadis U.S., Inc., Highlands Ranch, Colorado, February 21.

Dupuit, J., 1863. *"Études Théoriques et Pratiques sur l'Infiltration des Eaux dans les Sols"* (Theoretical and Practical Studies on the Infiltration of Water into Soils)

ENSR Corporation, 2006. Walter Creek Heap Leach Facility/Fort Knox Mine Environmental Assessment, Fairbanks Alaska.

FGMI, 2021, Reclamation and Closure Plan, Gil Project, Amendment 2, Revision 1 to (FGMI 2021)

FGMI, 2023. Fort Knox Mine Monitoring Plan. Fairbanks Gold Mining Inc., Environmental Department, Fairbanks, Alaska.

FGMI, 2024. Gil Satellite Mine Notice of Temporary Closure Authorization No. F20149852RCP, Fort Knox, Fairbanks Gold Mining Inc., Environmental Department, Fairbanks, Alaska.

FGMI, 2026. Reclamation and Closure Plan, Fort Knox, Fairbanks Gold Mining Inc., Environmental Department, Fairbanks, Alaska.

Golder, 2004. Five-Year Environmental Audit Fort Knox Mine. Golder and Associates Inc., Anchorage, Alaska.

KP, 2015, Report on Pre-Feasibility Level Geotechnical Investigations, Knight Piesold Consulting, 2015

Michael Baker International, 2018, Permittee Responsible Mitigation Plan, Fort Knox Gold Mine Fish Creek Valley, December 31, 2018.

Stantec, 2022. 2022 Permittee Responsible Mitigation Plan, Close out, Fort Knox Gold Mine, Fish Creek Valley, Stantec Consulting Services, Inc., Fairbanks, Alaska.

SRK, 2015. Preliminary Characterization of ML/ARD Potential, Gil Project, Fort Knox Mine, Alaska. Prepared for Fairbanks Gold Mining, Inc. by SRK Consulting (U.S.), Inc. (SRK). June 2015.

Water Management Consultants, 2006a. Fort Knox Mine Tailing Facility Closure Management Plan. Water Management Consultants, Inc. Denver, Colorado.

Water Management Consultants, 2006b. Fort Knox Mine Closure Management Plan for Proposed Heap Leach Facility. Water Management Consultants, Inc. Denver, Colorado.