THE STATE of ALASKA
GOVERNOR MIKE DUNLEAVY

Department of Natural Resources

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Manh Choh Mine Field Inspection Report

Inspection Date:	June 25, 2025
Time:	9:00 AM to 1:00 PM
Weather:	Partly cloudy in the morning becoming overcast with broken clouds in the afternoon clearing later in the day. Slight breeze at lower elevations with winds reaching around 20mph higher up with an average temperature of 60°F.
DNR Personnel:	Aaron Kruse, William Groom, Ashley Adoko
DEC Personnel:	Trisha Bower, Laona DeWilde
Manh Choh Personnel:	Paige Lambert, Luke Walker
Inspection Objectives:	Site Inspection

Operations:

Manh Choh Mine (Manh Choh) is located approximately 10-miles southeast of Tok, accessed via Alaska Highway, and is owned by Peak Gold, LLC (Peak Gold), a joint venture between Kinross Gold Corporation (Kinross, majority owner and operator) and Contango ORE, Inc. The mine's operational footprint resides on private native lands owned by the Village of Tetlin, who leases their mineral and surface rights to Peak Gold (Map 1). Mining began in late 2023 and is expected to continue to produce for 4 to 5 years.[1]

The mine is a conventional hardrock open pit truck and shovel operation employing approximately 300 people that runs year-round, twenty-four hours a day. Ore is hauled by truck to the Fort Knox mine near Fairbanks where it is stockpiled to be later milled in batched campaigns. The first gold bar from Manh Choh was poured in July 2024 followed by two additional milling campaigns in August and November producing a total of 141,000 oz of gold in 2024.[2]

Field Inspection Plan, Execution and Summary Schedule:

The Department of Natural Resources (DNR) is the lead agency regulating mining activities on private land for surface disturbance, water use, and reclamation. DNR conducts site inspections to ensure compliance with Manh Choh's Reclamation Plan Approval (F20232626RPA), as required under AS

[1] Manh Choh Kinross. (n.d.). *Manh Choh Bringing Jobs & Economic Opportunities To Interior Alaska.* Retrieved December 16, 2025, from https://manhchoh.com/

[2] Kinross. (2025). *Annual Activity Report for Reporting Year 2024*. Kinross Manh Choh A JV with Contango ORE. Pg. 8. Document available at DNR's website: https://dnr.alaska.gov/mlw/mining/large-mines/manh-choh/

27.19 and 11 AAC 97. The primary objectives for DNR personnel were to inspect active disturbance, such as ongoing construction, waste rock storage, reclamation, and water management. The inspection plan was designed to allow for selecting additional sites for inspection in an opportunistic fashion, and as time allowed.

DNR staff arrived at the Manh Choh office in Tok at approximately 7:30AM to meet with Kinross staff, Paige Lambert and Luke Walker to review the inspection plan for the mine site and its facilities and to discuss any relevant information before starting the inspection.

The inspection group left the Manh Choh office around 9:00 AM and drove to the Manh Choh access road via the Alaska Highway. There, DNR staff documented sediment track out control measures put in place to reduce material deposition on the highway. Continuing along the access road, DNR stopped at borrow sites, the change out yard, and other areas of interest to document surface disturbance and reclamation (Map 1). DNR also viewed the Untreated Water and Brine ponds above the Water Treatment Pad where a drone was deployed to document the Ore Loadout Area, water treatment facilities and Material Site 1. Next, DNR staff drove a short distance to the Mine Infrastructure Site, where the drone was deployed to document all infrastructure support facilities, North Waste Rock Dump (WRD), North Pit, ore stockpiles, and Explosives Storage area. DNR staff then continued to the Main WRD to deploy the drone to document the Dry and Wet Waste Rock stockpiles, Main WRD, and South Pit (Map 2).

Findings:

A summary of findings can be found below with a description of active sites that were visited. Detailed route maps with areas of interest, including photos of all inspected sites with observations notes, are in Appendix A.

1. Inspection of Active Areas of Disturbance and Reclamation

1.1. Track out of sediment from vehicles onto the Alaskan Highway has been a concern of Kinross for several years. Kinross has implemented several Best Management Practices (BMPs) to address the issue. DNR first documented a cattleguard installation in the spring of 2024 to help vibrate loose material from vehicles. Later that fall, the company extended the asphalt apron 500 feet from the highway to the cattleguard. Currently a temporary washing station has been implemented using a hand washer (Photos 1 and 2), which will be replaced by an automated system that will clean the undercarriage and tires of vehicles before turning onto the Alaska Highway.

1.2. Borrow pits along the access road to the mine have been documented by DNR for active disturbance and reclamation efforts. Last fall, pits visited were aerially seeded to promote stability and ensure more complete vegetative cover. The following is a quick overview of each site visited:

- The borrow sites at Mile Post (MP) 2.5 and 3.25 are inactive and have been reseeded multiple times before last fall. The area along the road was regraded and stabilized exhibiting about two years' worth of vegetative growth (Photos 3 and 4).
- The borrow site at MP 5 was active last year with material used to berm the access road and may continue to remain active. Topsoil was pushed back and piled for storage to later be used as cover material for reclamation (Photo 5).
- At MP 7.2, much of the borrow pit has had topsoil pulled back and seeded. The surrounding area has been contoured with multiple years of vegetative growth providing a good organic cover (Photo 6). At its southwest corner is a staging area for one of the mines contractors along with stockpiled aggregate rock (Photo 7).

- The borrow site at MP 10 has had some issues with wind blowing seeds away through the saddle at its peak. An organic cover has been established along most of the slope face; however, some barren areas along the base of the slope had minor rilling (Photo 8).
- At MP 12.8 there is a large borrow pit that's been expanded for use as a future laydown yard; however, it is still an active site with material stockpiles (Photo 9). The sides along the road have been contoured and seeded for slope stabilization. This is also the location for a growth media test plot.
- Material Site 1, located at MP 14.5, is active with a centralized excavation pit and aggregate stockpiles on its eastern end (Photo 10).

1.3. The ore haul truck change out and storage yard is well organized with a continuous exchange between driver and vehicle (Photo 11). Old culverts are stored on site from previous road construction and were stacked and sorted. Other road maintenance materials and equipment are staged for easy access and are properly stored (Photo 12).

1.4. At milepost 9.5, there is a road cut that experienced excessive erosion that undercut the jute matting in the spring of 2024. DNR has monitored the BMPs Kinross has put in place to stabilize the area and prevent further degradation. Last year Kinross removed the jute matting, re-sloped the cut to an angle of repose, and seeded. Currently the slope is in stable condition with good vegetative growth across its surface. There are still some barren spots that will be hand seeded to provide better coverage and stability (Photo 13). The sloped cut on the opposite side of the road did not erode in the spring of 2024 and now has had two years of vegetative growth (Photo 14).

1.5. The growth media test plots, located at MP 12.8 on the eastern edge of the borrow site, is a recent addition that began about three weeks prior to this inspection. There are several test plots, each with a consistent mix of organics but vary in depth of topsoil placed over waste rock from the North WRD. All the test plots have controlled seeding, except one, which was not seeded for comparison of natural vegetative regrowth (Photo 15).

1.6. Reclamation progress of the old access road alignment, located approximately at MP 14, was observed with the addition of water bars (Photo 16). The water bars were added as part of the BMP's used to control water runoff and the old road surface area was reseeded.

1.7. The footprint of the Ore Loadout Area has remained consistent with supporting facilities that include a highway truck shop, office trailers, and weigh scales. The peripheral area along the northwestern highway truck yard is used for storage of equipment and some road construction barriers. Mine haul trucks stockpile ore along the southern extent of the loadout area, which includes a waste rock material stockpile (Photo 17).

1.8. The Mine Infrastructure Site houses the main facilities for Kinross and contractors. The pad area footprint remains consistent; however, active waste rock deposition continues in the North WRD along its benches on the northeast side of the Mine Infrastructure Site (Photo 18). A recent addition of a small oxide and sulfide stockpiles of low-grade ore (Photo 19) across from the fuel island on top of the North WRD was observed on the southeast side adjacent to the main pad. This ore stockpile will be transferred to the Ore Loadout Area or disposed of within one of the pits. The main pad area is comprised of offices, maintenance shops, warehouse, fuel island, support equipment storage, communication tower and generator facility (Photo 20). The Explosive Pad, located northwest of the infrastructure site, continues to maintain the required separation for working around and between the magazines. DNR has also documented that the 2024 exploration pad off the road to the Explosive Pad has been reclaimed (Photo 21). Overall, the facilities observed are in good condition and well maintained.

1.9. Active excavation was observed for both the North and South pits. North Pit continues to be the only source of ore production until the deposit is bottomed out, possibly later this year (Photo 22). The South Pit was observed with active blasthole drilling of overburden waste rock (Photo 23). Clean waste rock material from the South Pit will be hauled for placement into the North Pit to provide a base above the water table. As part of the mine closure plan, the North Pit will be used to place potential metal leaching (ML) waste rock above the water table to keep it dry while potential acid generating (PAG) waste rock will be placed and submerged within the South Pit for remediation.[3]

1.10. DNR staff deployed a drone atop the Wet Waste Rock Stockpile to document it, the Dry Waste Rock Stockpile, and Main WRD. Both the Wet and Dry Waste Rock stockpiles have been placed on top of the western lobe of the Main WRD. The wet and dry waste rock stockpiles will be relocated to the North and South pits after mining is complete. In September of 2024, the Main WRD pad was complete and active placement for PAG and ML material was segregated into wet and dry waste rock stockpiles (Photo 24). During this inspection, DNR staff observed a well-developed buildout for each stockpile as compared to the previous year. It is noted that there is a greater volume of material generated for the dry waste rock Stockpile compared to the wet waste rock stockpile (Photo 25). Buildout of the Main WRD eastern lobe continues with the addition of several more benches of waste rock compared to observations from the previous year (Photo 26). Its overall disturbed footprint has remained the same; however, its volume and elevation continue to increase as outlined within Manh Choh's Reclamation and Closure Plan submission for the Main WRD scheduled development.[4]

2. Water Management

2.1. Two elevated water tanks were documented for use in dust suppression. The first tank is located at the western corner of the ore haul truck change out yard. The tank, water withdrawal well, and surrounding area are well maintained, and structures are in good condition (Photo 27). The second tank is located just southeast of the ore load out area (Photo 28). It was also in good condition and the immediate area well maintained. Dust suppression BMPs also include the application of magnesium chloride to the Manh Choh access road and five miles of the Tetlin road which have provided good results.

2.2. DNR staff deployed a drone over the Water Treatment Pad to document water levels of each pond and facility condition. Both the smaller Brine Pond and larger Untreated Water Pond, located at the upper elevation of the pad, appeared to have water storage volumes below previous levels noted by the staining on the liner (Photo 29). Water from the larger pond is primarily used for dust suppression, while brine water is generated from back washing filters from the Reverse Osmosis (RO) water treatment plant. The RO water treatment facility next to the Open Treatment Pond is currently not in operation (Photo 30). Overall pad and facilities are well organized and in good condition.

2.3. Water ditches and retention ditches surrounding the perimeter of the mine were documented through aerial drone imagery. The northeast, southeast and west ditches were clean of debris with no visible water except in the lined retention ditches (Photo 31). Both the North and South Ditch Lined Ponds, located adjacent to the ore load out area, were lower than what has normally been observed from previous inspections and as indicated by water staining levels along the liner

[3] SRK Consulting. (2023). *Manh Choh Project Reclamation and Closure Plan Revision 1.* Prepared for Peak Gold, LLC. Section 7.8.1. Document available at DNR's website: https://dnr.alaska.gov/mlw/mining/large-mines/manh-choh/

[4] Ibid

(Photo 32). The water ditches, retention ditches and associated ponds appeared to be in good condition and are well maintained.

Conclusion and Recommendations:

Peak Gold facilitates their mining activities in a manner which prevents unnecessary and undue degradation of private lands and to State water resources. All observed activities conform with the Reclamation Plan Approval, and current activities meet the state's requirements under AS 27.19 and 11 AAC 97. DNR finds Manh Choh operations are in good condition and consistent with industry standards.

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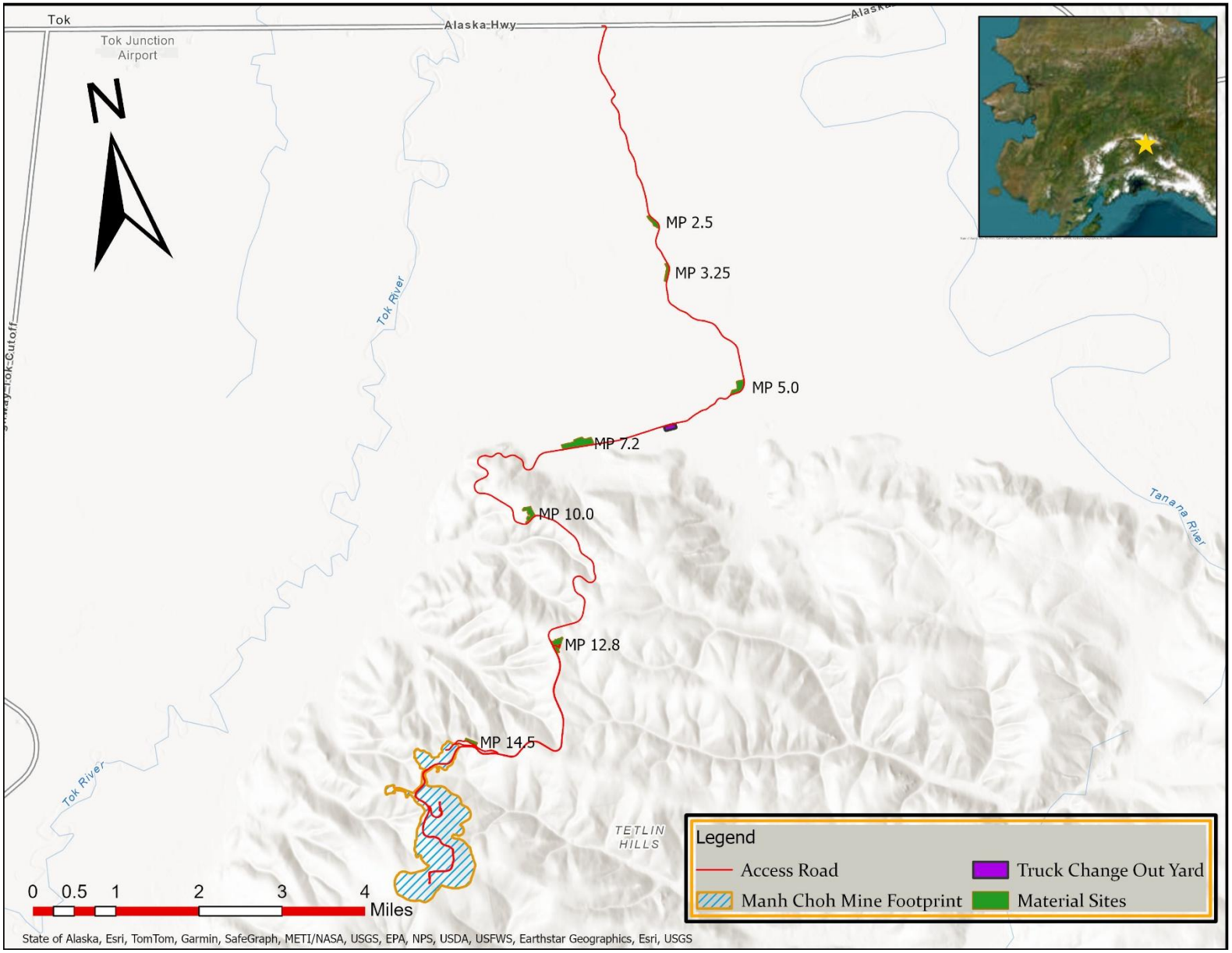
Appendix A

Inspection Maps, Photos, and Observations of Note



Map 1: Footprint of the Manh Choh Mine and supporting facilities including mine road access and borrow sites on Tetlin Land.

Map 2: Layout of the Manh Choh Mine's facilities, active areas of disturbance, and water management documented during inspection.

Field Inspection Photos with Observations of Note

Photo 1: Cattleguard and paved apron prior to entering the Alaska Highway (north) used to control *sediment track out* onto the highway. Just right of the cattleguard is the hand-washing station.	
Photo 2: Water tanker and high-pressure washer located on the opposite side of the access road from the wash station.	

Photo 3: Sloped, contoured, and seeded inactive borrow pit at MP 2.5 exhibiting several years of vegetative growth.	
Photo 4: Sloped, contoured, and seeded inactive borrow pit at MP 3.25 exhibiting several years of vegetative growth.	

Photo 5: Borrow site at MP 5 was active last year to provide material to berm the mine access road. Topsoil was pushed to the back of the borrow site for storage to be used later as cover material for reclamation.	
Photo 6: Most of the area for the borrow site at MP 7.2 has been reclaimed with several years of growth since seeding. It still has a small active area for material removal (circled).	

Photo 7: Within the southwest corner of the borrow site at MP 7.2 is a mine contractor staging area. This area is also used for stockpiling aggregate road material.	
Photo 8: Borrow site at MP 10 has been graded, contoured, and reseeded. New growth and establishment of vegetation have been hindered by wind blowing seeds away. Minor rilling is present, mostly at the lower end of the slope.	

Photo 9: Borrow site at MP 12.8 has been expanded for use as a future laydown yard. This area is still used for stockpiling aggregate material.	
Photo 10: Material Site 1 is active and located near the ore loadout area at MP 14.5.	

Photo 11: Truck change out yard between drivers from the mine to those who will truck the ore to Fort Knox for milling.	
Photo 12: Culverts and other road building/maintenance material and equipment stored along the periphery of the truck change out yard.	

Photo 13: Stabilized road cut at MP 9.5 that was re-sloped and seeded after erosional issues from the previous year. Hand seeding BMP's are proposed to fill in barren areas.	
Photo 14: MP 9.5 road cut on the opposite side from photo 13 exhibiting about 2 years of vegetative growth. No previous issues with soil instability.	

Photo 15: Growth media test plots are located within the eastern portion of the material site at MP 12.8. Each plot has a consistent mix of organics, but vary in depth of topsoil placed over waste rock. All test plots have controlled seeding, except one which will be allowed to germinate naturally.	
Photo 16: Reclamation of old road alignment. Water bars are in place to mitigate water runoff and aid in seed germination.	

Photo 17: Ore Loadout area facilities include highway truck shop, scales, ore and material stockpiles.	
Photo 18: Active deposition of waste rock along the eastern edge of the North WRD.	

Photo 19: Oxide and sulfide stockpiles of low-grade ore adjacent to the Mine Infrastructure Site located on the southern end of the North WRD.	
Photo 20: View to the south of the Mine Infrastructure Site that houses all offices, shops, and warehouse. North WRD wraps around most of the extent of the infrastructure pad from the north clockwise to the south.	

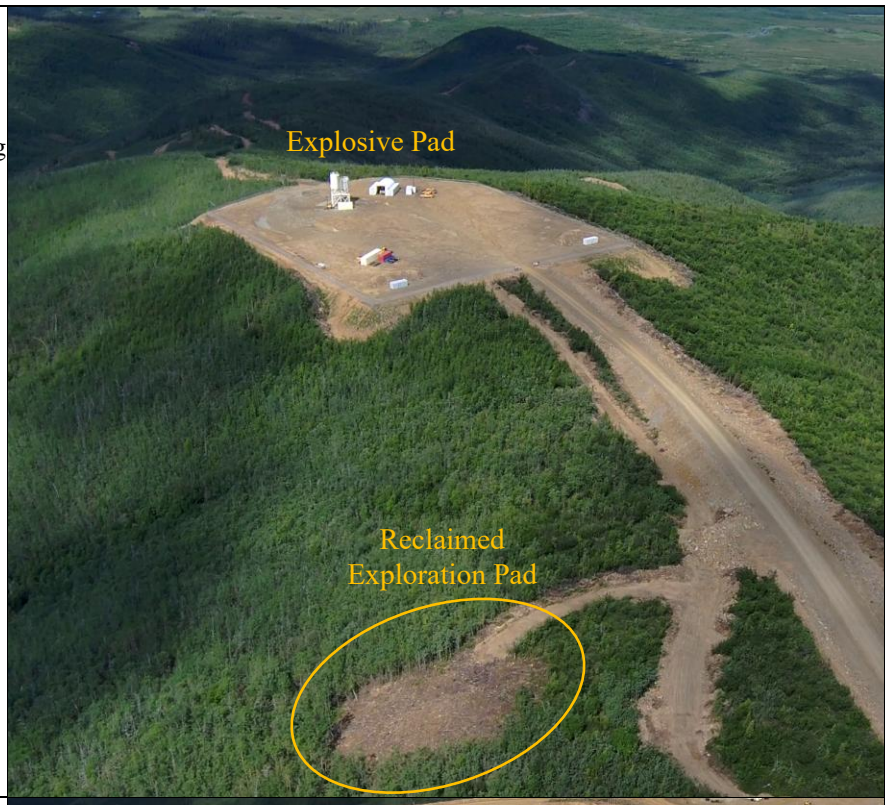
Photo 21: Foreground, old drilling exploration pad has been re-graded with growth media spread over its surface. Background looking northwest is the explosive pad.	
Photo 22: View to the northwest of the North Pit. Active excavation and removal of material was observed below the north highwall. North Pit is currently the only source of ore production. It is expected to bottom out later in the year.	

Photo 23: View to the west of the South Pit. Active drilling was observed. Clean waste rock from the South Pit will be placed in the bottom of the North Pit to provide the base above the water table for waste material deposition.	
Photo 24: View to the northwest of the western lobe of the Main WRD. This photo was taken in 2024 to show a comparison of new deposition on top of the Main WRD to current volumes between the wet and dry waste rock stockpiles.	

Photo 25: Current buildout of the wet and dry waste rock stockpiles. Several benches of material have been added since last year with a greater depositional volume of wet stack material compared to dry stack material.	
Photo 26: View of the eastern lobe of the Main WRD looking west. Buildout of several more benches of waste rock has occurred since the previous year.	

Photo 27: View looking towards the western corner of the ore haul truck change out yard. Well location for the water draw point is noted to the right of the elevated water tank. Water is primarily used for dust suppression along the access road.	
Photo 28: Westerly view at the start of the mine vehicle access road of elevated water tank. Elevated water tank has water pumped from a nearby lined pond below the eastern extent of the ore load out area.	

Photo 29: View to the southwest of the Brine and Water Treatment ponds. Water levels are lower than previous inspection. Water Treatment Pond water is primarily used for dust control. Brine Pond water is generated from backwashing filters from the RO water treatment facility.	
Photo 30: Northeast view of the Water Treatment Pad and associated facilities. The RO facility is currently not in operation.	

Photo 31: View to the northeast just above the western lobe of the Main WRD. Water ditches and retention ditches encompass all mine related facilities. In the background note the location of the South Retention Ditch located just west of the North and South pits.	
Photo 32: View of the South Ditch and Lined Pond that collects water along the eastern edge of the ore loadout yard and mine access road. This pond and ditch are the water source for the elevated tank in Photo 28.