2025 Annual Reclamation Report
No. J20245690 RPA

Upland Mining Lease No. 9100759

Palmer Project
Porcupine Mining District, Alaska

Prepared by: Constantine North Inc.

Prepared on behalf of: Constantine Mining LLC.

February 2026

Table of Contents

Table of Contents **2**

Location and Activity Description **1**

Location 1

Project Activity 1

Site Disturbance **6**

Reclamation **10**

Financial Responsibility **10**

Monitoring **10**

Compliance Monitoring – Waste Management Permit 10

Other Monitoring and Studies 11

Appendix A: **10**

Waste Management Permit – 2025 Q1 Water Quality Monitoring Report **10**

Location and Activity Description

Location

The Palmer Project is a copper-zinc-gold-silver (barite) exploration project located 34 miles northwest of the town of Haines in Southeast Alaska, USA.

Until November 15, 2024, the Palmer Project was a joint venture between Dowa Metals & Mining Alaska ("Dowa"), a 100% owned US subsidiary of Dowa Metals and Mining Co. Ltd of Japan and Constantine North Inc ("Constantine") a 100% owned US subsidiary of Constantine Metal Resources Inc, which was a 100% held subsidiary of American Pacific Mining Corp of Vancouver, BC. On November 15, 2024, American Pacific Mining Corp ("American Pacific") completed a Purchase Agreement with Dowa Metals & Mining Alaska Ltd. ("Dowa"), whereby Constantine North Inc acquired Dowa's interest in Constantine Mining LLC, the holder of the Palmer Project. On December 4, 2025, Constantine Metal Resources Ltd. and its wholly owned subsidiaries (Constantine North Inc and Constantine Mining LLC) were acquired from American Pacific Mining Corp. by Vizsla Copper Corp.

The Project is in the Porcupine Mining District on the eastern margin of the Saint Elias mountain range. Figure 1 shows the location of the Project. The western boundary of the Project is the international border with the Canadian province of British Columbia. The Project is located proximal to the paved Haines Highway (Alaska Hwy 7), which leads to the town of Haines, Alaska, to the southeast. A secondary gravel logging road connects the project area to the Alaska Hwy 7 via a bridge across the Klehini River at 26-mile. Camp and core logging facilities are located on privately-owned land at the Big Nugget Camp located on Porcupine Creek and at the Klehini Camp less than 1 kilometer down the road from Big Nugget.

Project Activity

2025 Summary and Background

Constantine had no surface exploration drill program in 2025. Primary activities included the removal of the Klehini Camp located on Constantine's private property.

Constantine has proposed the development of an underground exploration ramp to support underground drilling. The underground development includes the construction of the supporting surface infrastructure and operation of the wastewater disposal system (Land Application Disposal system or LAD). Works associated with underground exploration are on fee simple and split estate Mental Health Trust (MHT) lands. The MHT lands are leased to Constantine under MHT Upland Mining Lease No. 9100759 (Figure 1).

Construction supporting the underground exploration was originally bonded through RPA J20185690, originally issued in 2018 (Phase I) and amended in 2019 (Phase II). Surface construction was initiated in 2018 and then paused from 2019 to 2021 while Constantine updated the LAD and road design. Approval for the updated design (Figure 2, Figure 3) was obtained in May 2022 with a modification to the Reclamation Plan and associated financial assurance (J20185690.1).

Construction activities in 2022 focused on surface facilities to support future underground development. Construction continued on the road switchbacks and the avalanche deflection structures. Earthworks associated with the Land Application Disposal (LAD) system were initiated and included the partial excavation of the sediment ponds and grubbing for pipelines. The access road for the portal was 60% complete at the end of the 2022 field season.

No additional work has been completed on MHT lands since the 2022 field season. On-going maintenance occurs to account for maintaining stormwater control features. The Reclamation Plan approval previously issued by ADNR had an expiration date of July 16, 2024. To remain compliant, Constantine applied for renewal of the RPA, updating the reclamation cost estimates to account for inflation, changes in equipment costs, and changes in labor rates. The terms of the amended Reclamation Plan are discussed in the Financial Responsibility section of this report. The application by Constantine was reviewed by ADNR and approved November 22, 2024.

This report summarizes disturbance as of the end of 2022 (the most recent disturbance) associated with the Phase II Plan of Operations and fulfills the annual reporting requirements for the ADNR Reclamation Plan Approval (no. J20245690 RPA).

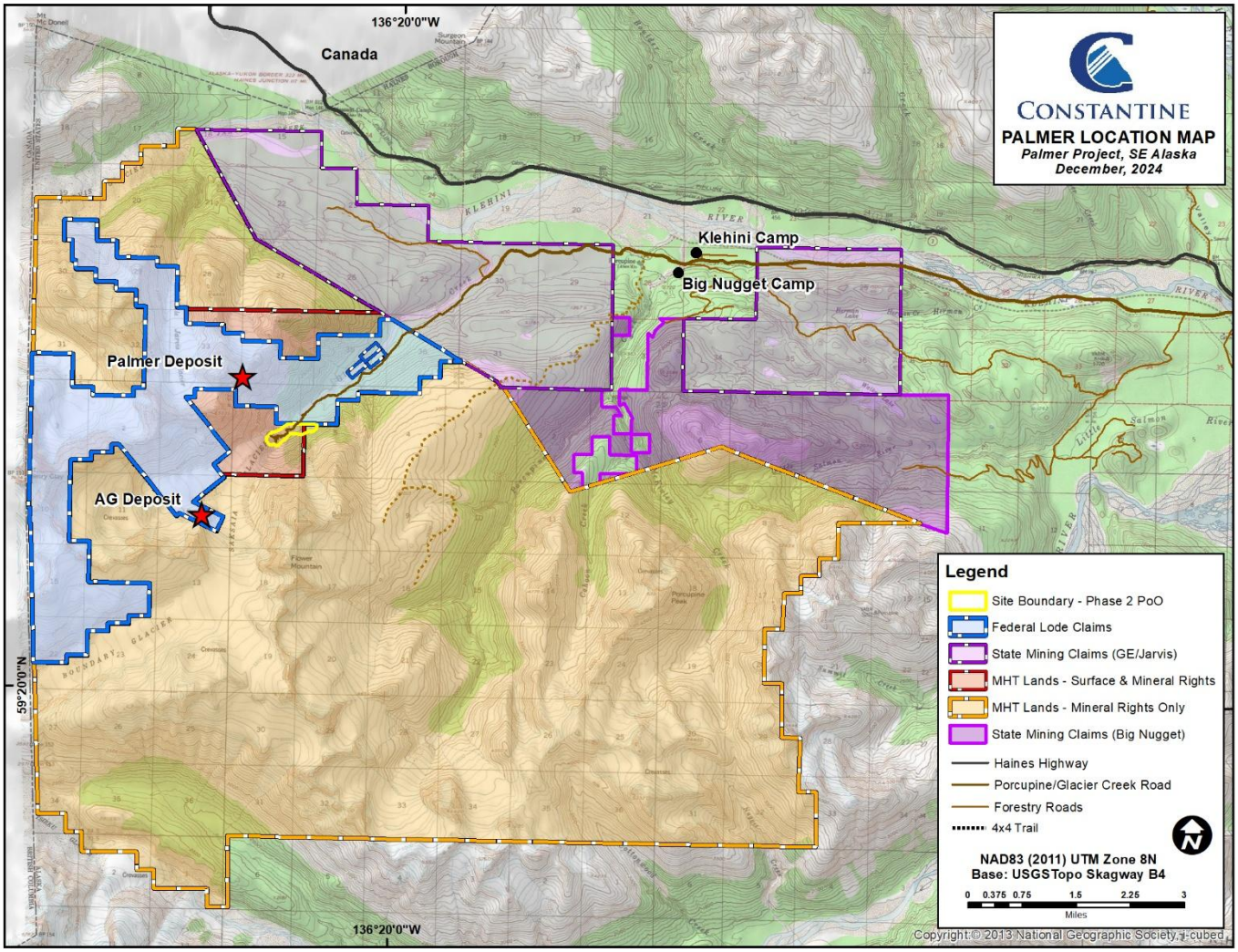


Figure 1. Palmer Project Location Map showing Site Boundary.

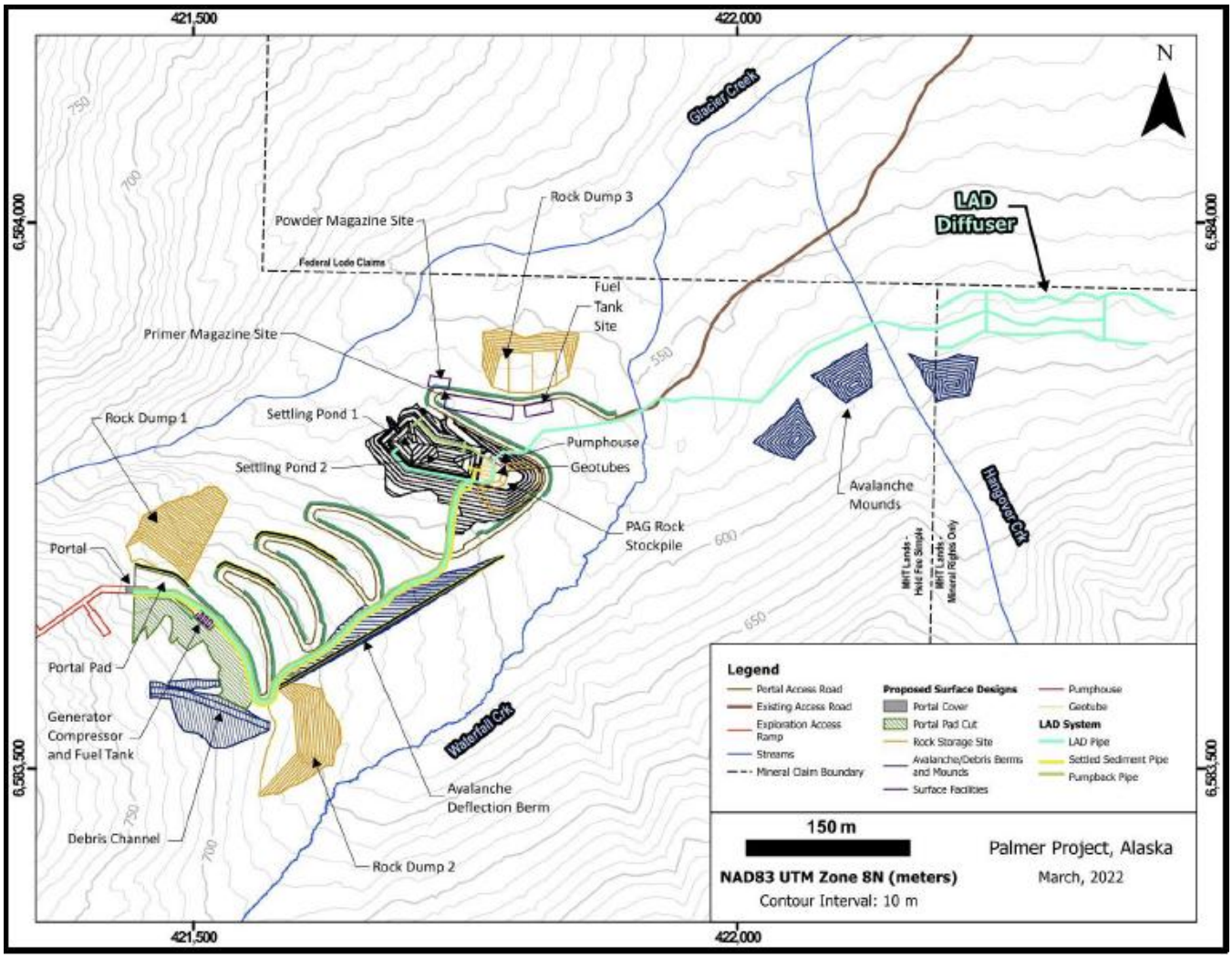


Figure 2. Conceptual designs for site facilities.

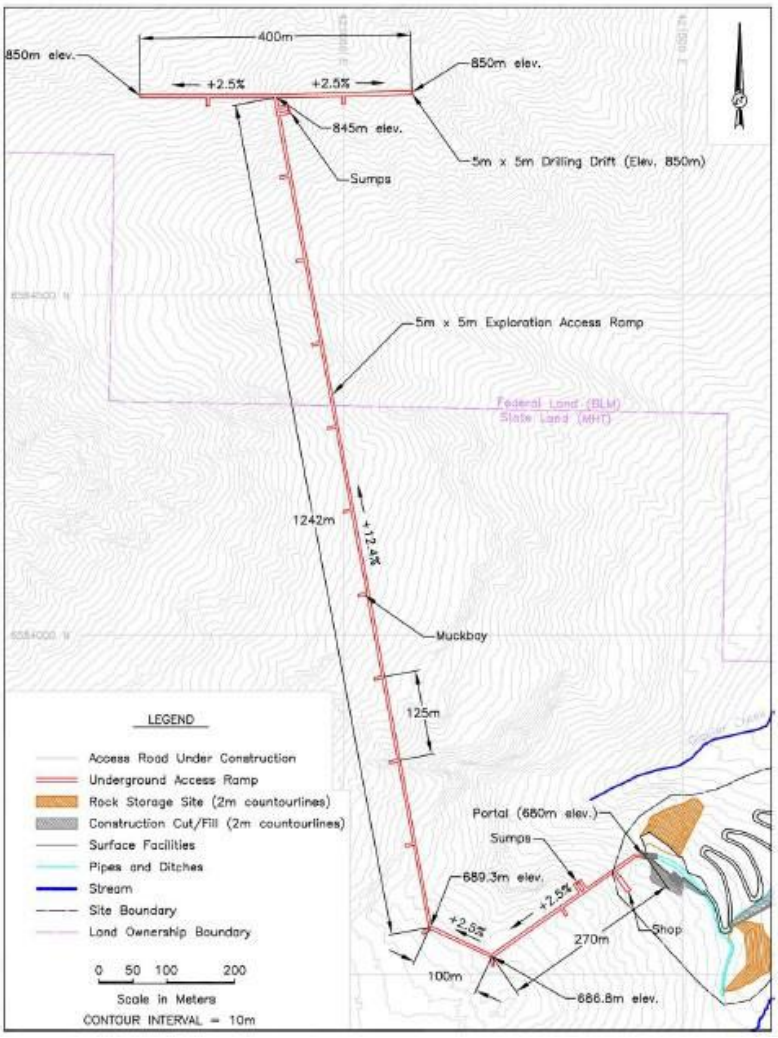


Figure 3. Conceptual design for Phase II exploration access ramp.

Site Disturbance

Constantine has prepared reclamation plans for both temporary closure and permanent closure scenarios, approved by the ADNR. The access road on Trust lands will be left in place at closure per an understanding with the Trust.

No additional construction work was completed in 2025. The following is a summary of the most recent construction work completed in 2022. In 2022, construction on the proposed portal access road switchbacks and planned infrastructure area occurred. The Phase II site boundary was updated to account for disturbance related to the revised LAD, and the boundary now reaches into MHT Parcel C81210 (Subsurface Rights Only). An estimated total of **3.71 acres** were disturbed in 2022 within the modified Phase II site boundary, of which **1.22 acres** were associated with access road work. New disturbance was created along and around the portal access road and switchbacks, the portal pad area, the avalanche berm and mounds area, the sediment pond and PAG storage area, and the LAD clearing area. Total disturbance increased to an estimated total of **10.54 acres** (excluding the road), approximately 2.49 acres greater than 2021. Disturbances are tabulated below and shown on Figure 5.

Table 1. Summary of Disturbance Components and Associated Acreage of Disturbance, 2022.

Item	Acreage
Road	11.05
Portal Pad	1.53
Avalanche Berm and Mounds	3.52
Sediment Pond and PAG Storage	3.08
LAD Clearing	1.96
2021 Overburden Drilling	0.42
Monitoring Wells	0.03
TOTAL	**21.59**
TOTAL (Excluding Road)	**10.54**

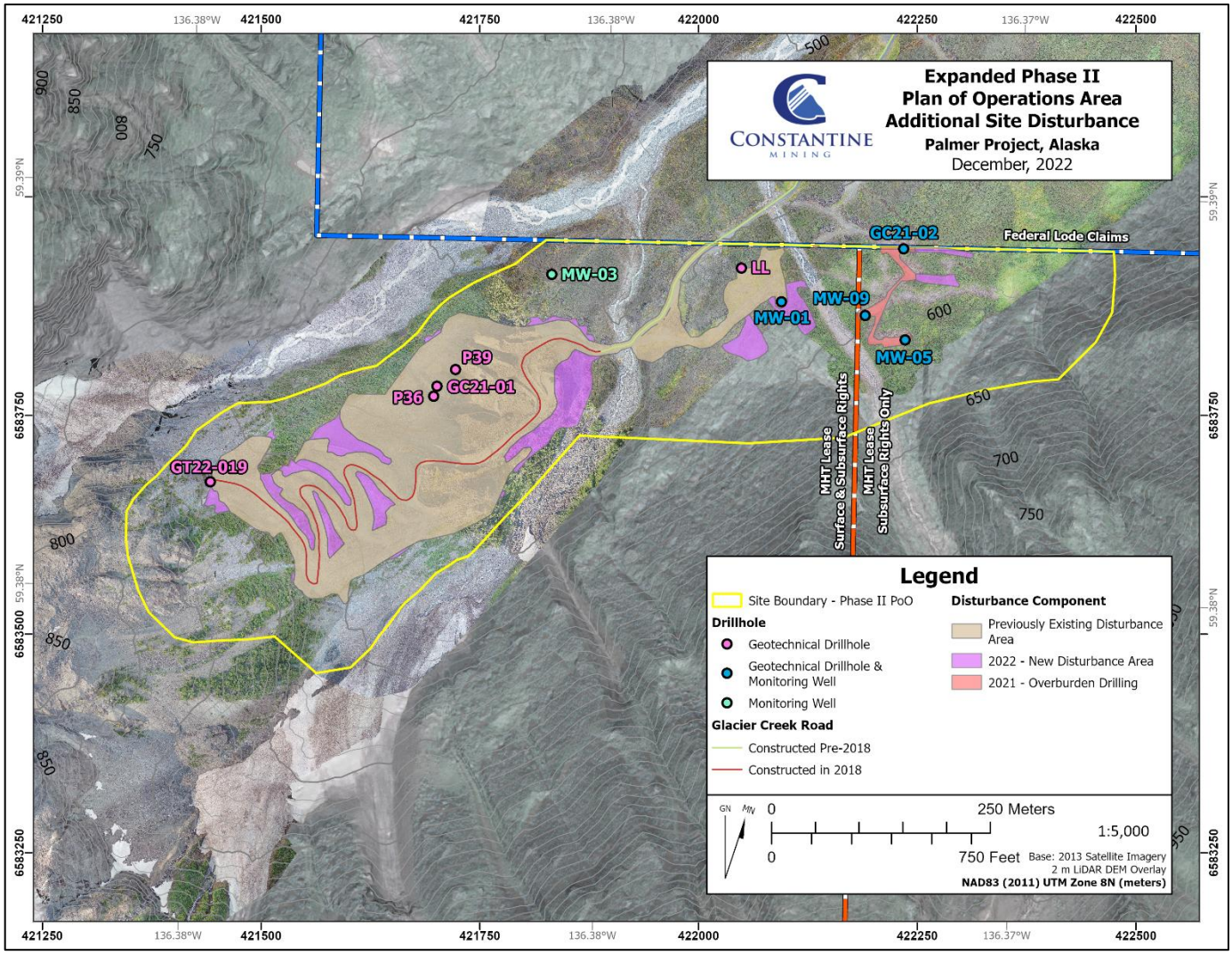


Figure 4. Location map of disturbance created during 2022 and of 2021 overburden drilling disturbance added to the Phase II Plan of Operations area. 2.49 acres of additional non-road related disturbance was created in 2022.

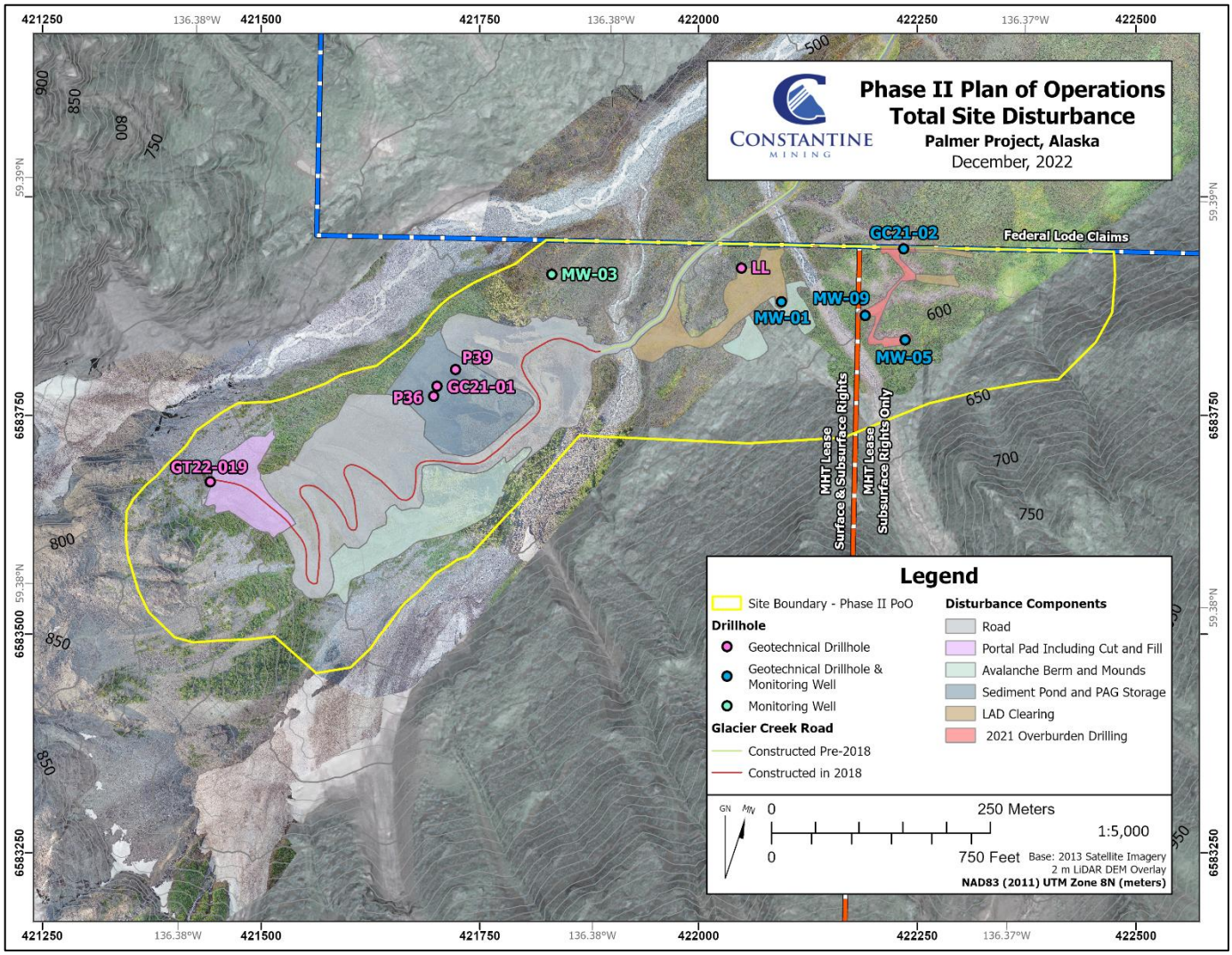


Figure 5. Location map of all disturbance components as of 2022.

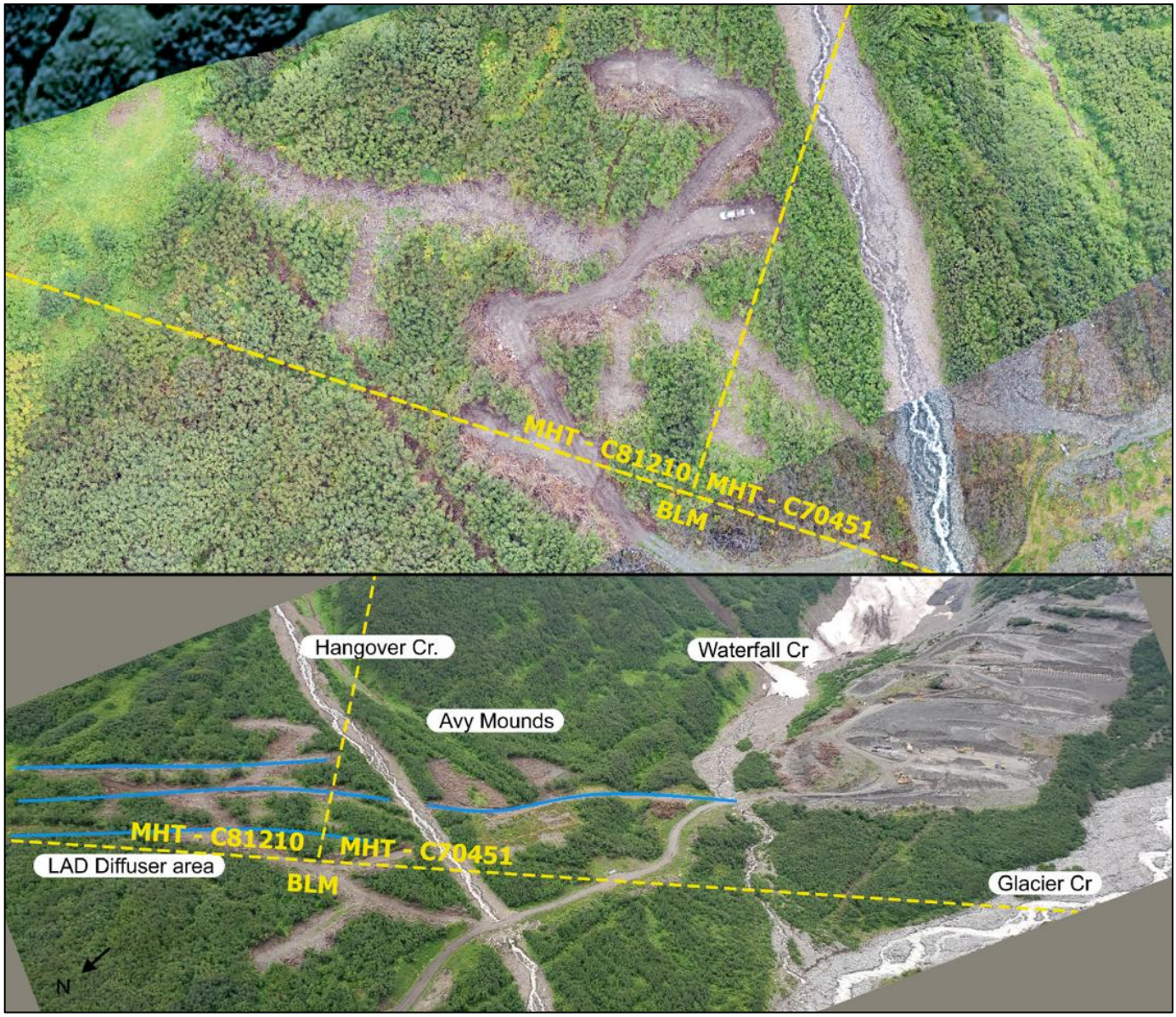


Photo 1. Disturbance from 2021 overburden drilling included in expanded Phase II Plan of Operations Boundary (upper). Aerial photo (taken August 16, 2022), looking SE, showing land clearing associated with Phase I & II Plan of Operations on MHT Lands (lower).

Reclamation

No permanent reclamation was performed in 2025.

Financial Responsibility

Previous approval of the Phase II Plan of Operations Reclamation Plan was set to expire in July of 2024. As such, Constantine applied for a renewal of the Reclamation Plan Approval in May of 2024 and received approval of the Plan on November 22, 2024. Changes to the reclamation cost estimate included updates to the equipment costs, adjustments for inflation, and updated labor hour costs. A total financial assurance amount of $1,272,000 was approved by ADNR for the Palmer Project. As implemented as part of the previous reclamation plan approval by DNR, Constantine requested a phased approach to the financial assurance. Constantine proposed providing a current financial assurance in the amount of $450,000 for the existing disturbance outlined in this report. Prior to the construction of the remaining work outlined by the WMP (i.e. underground development), Constantine would further amend the financial assurance to the full amount of the approved Cost Estimate. Constantine provided financial assurance in the amount of $450,000 for the 2025 season.

During an internal audit in spring of 2025, it was identified that there was an error in the cost spreadsheet used to calculate the bond amount of $450,000. Correcting for the error, the total amount of bond required should have been $463,000. To account for inflation, Constantine recommends adjusting the total bond amount by 2.1% for inflation based on Alaska Department of Labor and Workforce Development's CPI index for 2025, from the corrected $463,000. This would result in a financial responsibility of requirement of $473,000 for 2026. Additionally, Constantine recommends re-baselining labor and equipment cost assumptions in the temporary and permanent closure cost estimates prior to the 2027 annual reclamation report as it will have been three years since the original justification (2024).

Monitoring

Compliance Monitoring – Waste Management Permit

The Waste Management Permit #2019DB0001 (WMP) was issued to Constantine Mining LLC by the State of Alaska, Department of Environmental Conservation (ADEC) on July 17, 2019. The WMP authorizes the management and disposal of underground seepage water and waste rock associated with Phase II.

The WMP was remanded by ADEC in September 2019 for an informal review largely due to the Maui v. Hawaii Wildlife Case which challenged the permitting authority for disposal of wastewater to groundwater. In August 2020 Constantine notified ADEC that an evaluation and re-design of the LAD system was underway to ensure that the LAD was compliant with the changing legal environment. Constantine collected additional information on site hydrogeology to inform the LAD re-design. The re-designed LAD and results of supporting hydrogeological studies were submitted to

the ADEC on April 14, 2022 (available from ADEC upon request). Subsequently, conditional approval for construction of the LAD was provided by the ADEC on May 27, 2022. The approval was withdrawn on September 6 to account for new information submitted by a third party. On October 4 the conditional approval for the LAD construction was re-issued and the WMP remand was lifted. Since then, the Commissioner of the Department of Environmental Conservation decided on the challenge to the WMP in August of 2023. That Decision is now under challenge in the Superior Court and Supreme Court.

Water Quality Monitoring required under WMP2019DB0001 occurred in Q1 of 2025. After the Q1 sampling event, Constantine requested DEC suspend quarterly water quality monitoring requirements until activities associated with the Phase II Plan of Operations resume. DEC approved suspension of these activities in 2025 with stipulations requiring sampling resume prior to initiating activities associated with the Phase II Plan of Operations. A copy of the 2025 Q1 Water Quality Monitoring Report has been included with submission of this report.

Other Monitoring and Studies

Other voluntary environmental monitoring activities conducted in 2025 include:

- Meteorological monitoring

Appendix A:
Waste Management Permit – 2025 Q1 Water Quality Monitoring Report

Note: appendices of the Waste Management Permit annual report are available from the ADEC

Table of Contents

1.0 INTRODUCTION 4
1.1 BACKGROUND 4
1.2 PROJECT ACTIVITIES 4
2.0 ENVIRONMENTAL MONITORING 5
2.1 SURFACE WATER MONITORING 5
2.1.1 Background 5
2.1.2 Water Quality 6
2.1.3 Water Quantity 7
2.2 GROUNDWATER MONITORING 7
2.2.1 Background 7
2.2.2 Water Quality 9
2.2.3 Groundwater Level and Temperature 10
2.3 METEOROLOGICAL MONITORING 12
3.0 OTHER COMPLIANCE ITEMS, UPDATES AND STUDIES 12
3.1 WMP COMPLIANCE 12
3.2 HYDROGEOLOGY WORK 13
4.0 SUMMARY 13
5.0 REFERENCES 14

LIST OF TABLES

Table 1 Surface water monitoring stations 6
Table 2 – Q1 2025 Surface water quality results compared to WMP trigger limits 6
Table 3 Groundwater Monitoring Stations 9
Table 4 MW-04-S Q1 Water Quality Results Compared to WMP Trigger Limits.....10
Table 5 – WMP Deliverables 12
Table 6 - Q1 WMP Trigger Limit Exceedances - MW-04S 14

LIST OF FIGURES

Figure 1 WMP Surface water quality monitoring stations 5
Figure 2 Flow measurements collected from surface water monitoring stations over time 7
Figure 3 WMP Groundwater quality monitoring stations MW-01 & MW-02 8
Figure 4 WMP Groundwater quality monitoring stations MW-05 & MW-04-S 9
Figure 5 – Groundwater level and temperature over time 11
Figure 6 – MW-05: Groundwater level and temperature over time.....11

LIST OF APPENDICES

Appendix A Water quality graphs

Appendix B Water quality data (digital file)

1.0 INTRODUCTION

1.1 BACKGROUND

The Waste Management Permit #2019DB0001 (WMP) was issued to Constantine Mining LLC (Constantine) by the State of Alaska, Department of Environmental Conservation (DEC) on July 17th, 2019. The WMP authorizes the management and disposal of underground seepage water and waste rock associated with advanced exploration at the Palmer Project (the Project).

On August 10th, 2020, Constantine submitted a letter informing the DEC of their intent to modify the Wastewater Discharge System Design as set out in Appendix A of the WMP. On August 31st, 2020, the DEC accepted a redesign with the condition that no construction can commence until the design is complete. Constantine collected additional hydrogeological information in 2020 and 2021 to support the new Wastewater Discharge System Design. The revised design was submitted to DEC on April 14th, 2022, with minor revisions submitted on May 24th, 2022. The revised design was conditionally approved by DEC on May 27, 2022, allowing construction of the revised Wastewater Discharge System. Approval was briefly vacated from September 6th – October 4th, 2022. On June 2nd 2023, DEC approved the amendment to update monitoring sites in response to the updated LAD design which removed MW-01 and MW-02 from monitoring plan and replaced them with MW-04-S and MW-05.

On March 18th, 2024, Constantine submitted a request for extension of WMP 2019DB0001, which had an original expiration date of July 16th, 2024. DEC reviewed the request for extension and found that the request was timely and satisfied regulatory requirements found under 18 AAC 15.110(a)(1) – Administrative continuance of expiring permits and, as such, the permit remains effective as is.

The WMP outlines monitoring and reporting requirements (Sections 2.5 and 2.6). This report includes the monitoring period for the first quarter of 2025 and satisfies Section 2.6.3, which requires reporting on monitoring activities.

1.2 PROJECT ACTIVITIES

The surface construction described in the WMP and Plan of Operations (approved by DNR under J20185690RPA) has commenced. Underground development has not yet commenced therefore waste authorized by the WMP has not been generated to date. As a result, monitoring associated with operating site infrastructure is not included in this report (as described in Sections 2.5.1, 2.5.2, 2.5.3, 2.5.4, 2.5.5.3, and 2.5.5.4 of the WMP) and data presented in this report continues to characterize baseline conditions.

Constantine started the 2022 field season on June 13th. A road construction crew was mobilized on June 20th, 2022, to begin working on the switchbacks to the proposed portal site. Two diamond drills were mobilized during the first half of August. Activities related to diamond drilling and switchback construction are not expected to impact the water quality presented in this report. Excavation of the LAD system sediment pond #1 began in late August 2022 and is 80% complete. No other work was done on the LAD system. Diamond drilling and construction activities ended at the end of September. No additional work was performed on the LAD system in 2024. Intermittent environmental work continues year-round.

2.0 ENVIRONMENTAL MONITORING

2.1 Surface Water Monitoring

2.1.1 BACKGROUND

Four surface water stations in the Project area have been monitored since as early as 2008: P01 (Glacier Creek upstream), P27 (Glacier Creek midpoint), P25 (Waterfall Creek), and P26 (Hangover Creek; see Figure 1 and Table 1). Water quality sampling and analytical procedures are performed in accordance with Constantine's Quality Assurance Project Plan (QAPP), prepared by Integral Consulting in 2018 and revised by HDR in October 2019 (as per Section 2.5.5.6 of the WMP). Samples are analyzed by ALS Environmental Laboratory for conventional parameters, settleable solids, cations/anions, total/dissolved metals following SM and EPA methods. Field parameters including pH are also collected at each site during the sampling event (more detail is available in the Project QAPP).

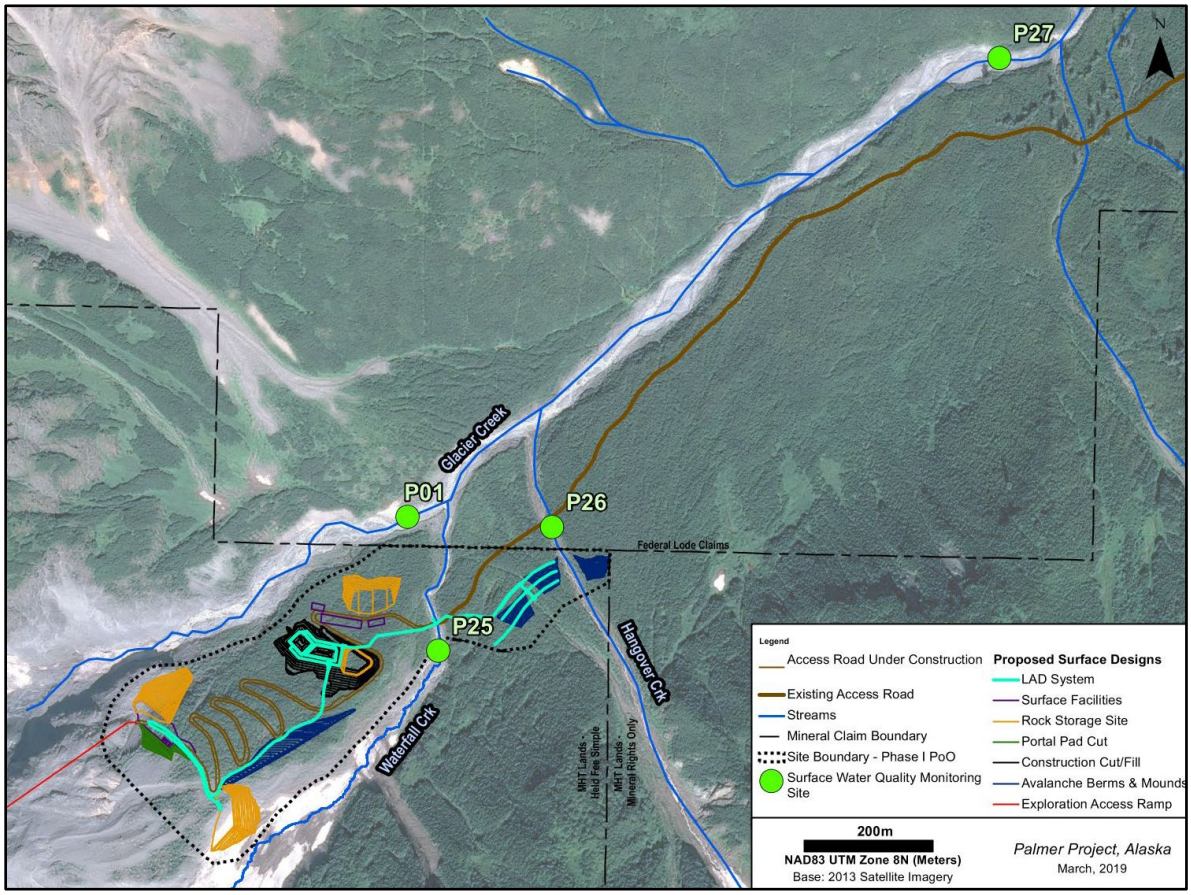


Figure 1 WMP Surface water quality monitoring stations

Table 1 Surface water monitoring stations

Station	Station Location	Description	Date sampling initiated	No. of water quality sampling events
P01	Upper Glacier Creek	Upstream of exploration impacted area; near source of Glacier Creek	September, 2008	42
P27	Midpoint of Glacier Creek	Below exploration impacted area	February, 2017	42
P25	Waterfall Creek	Downgradient of the proposed LAD upper diffuser	February, 2017	31
P26	Hangover Creek	Downgradient of the proposed LAD lower diffuser	July, 2017	29

2.1.2 WATER QUALITY

As per the WMP (Section 2.5.5.2), surface water is monitored on a quarterly basis at four sites: P01, P27, P25, and P26 (see Figure 1 and Table 1). All four sites were sampled in the first quarter of 2025.

Trigger limits are defined in the WMP for P27, P25, and P26. Water quality parameters were met at all three stations during the first quarter of 2025.

Concentrations of water quality parameters at each surface water monitoring station over time are presented graphically in Appendix A, and raw water quality data is digitally available in Appendix B.

Table 2 – Q1 2025 Surface water quality results compared to WMP trigger limits

Parameter	Units	P25		P26		P27	
		Result	Trigger	Result	Trigger	Result	Trigger
aluminum	mg/L	0.010	10	0.0239	21	0.0264	43
arsenic	µg/L	<0.10 U	10	0.13	10	<0.10 U	10
cadmium	µg/L	0.0339	0.37	0.0303	0.79	0.080	0.39
calcium	mg/L	148	NA	124	NA	100	NA
copper	µg/L	<0.050 U	24	<0.50 U	70	<0.50 U	133
iron	mg/L	0.012	16	0.029	39	0.044	16
lead	µg/L	<0.050 U	4.3	<0.050 U	4.3	<0.050 U	6.4
magnesium	mg/L	16.4	NA	7.56	NA	11.3	NA
manganese	µg/L	0.032	290	0.81	970	1.69	2200
mercury	µg/L	<0.0050 U	0.012	<0.0050 U	0.012	<0.0050 U	0.012
nitrate as N	mg/L	0.226 J	10	0.0660 J	10	0.322 J	10
pH	s.u.	8.13	<6.5 or >8.5	8.19	<6.5 or >8.5	7.92	<6.5 or >8.5
selenium	µg/L	4.92	2.99	1.86	5	1.84	5
sulfate	mg/L	330	229	108	299	195	268
total dissolved solids	mg/L	601	470	234	573	408	500
zinc	µg/L	<3.0 U	146	<3.0 U	147	47.8	470

2.1.3 WATER QUANTITY

Constantine voluntarily collects hydrometric data from the monitoring stations, when safe to do so. No data was collected in Q1 of 2025. An overview of historically collected data is shown in Figure 2.

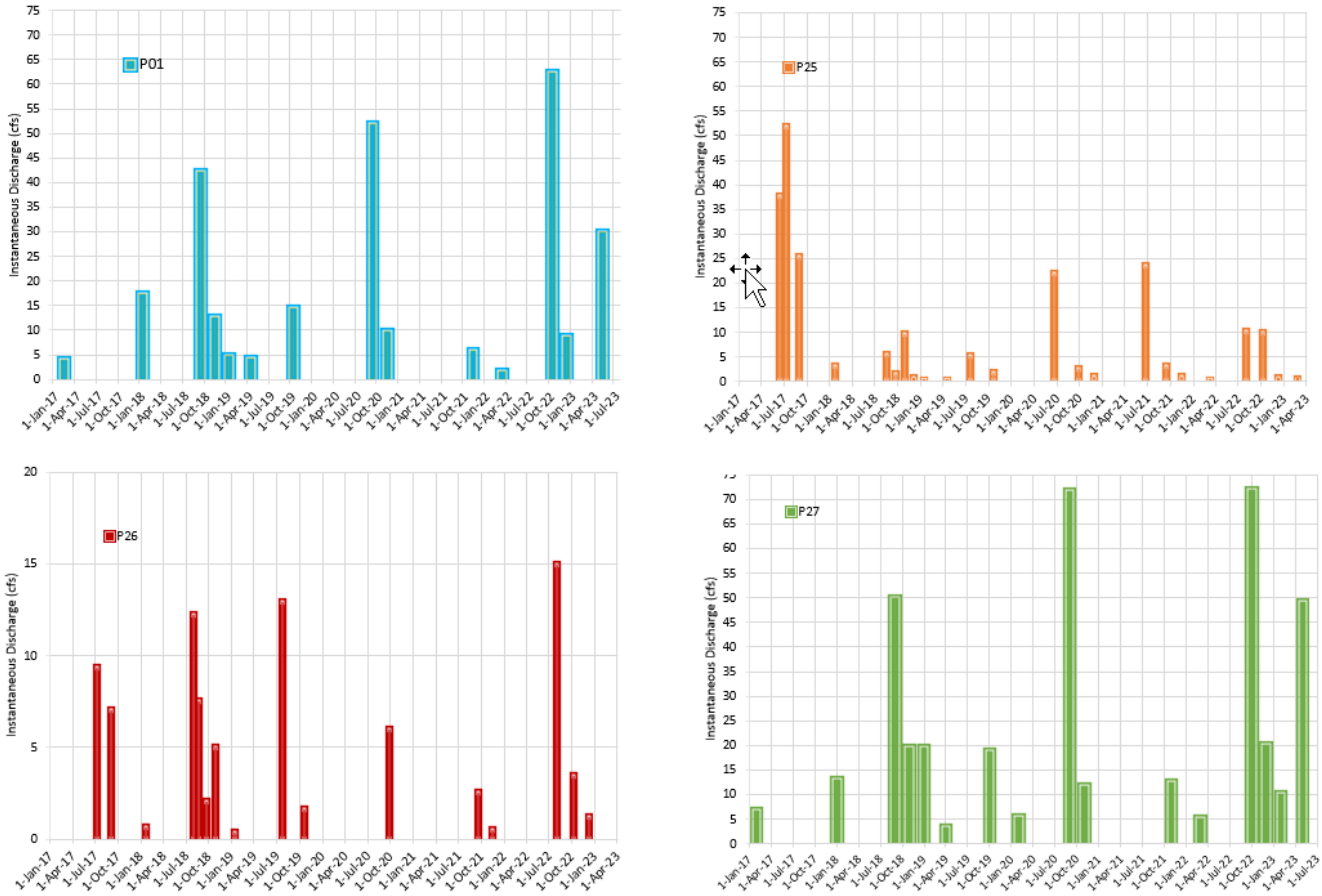


Figure 2 Flow measurements collected from surface water monitoring stations over time

2.2 Groundwater Monitoring

2.2.1 Background

In 2018 Constantine developed two groundwater monitoring wells above and below the proposed LAD lower diffuser site (MW-01 and MW-02, respectively), and began sampling on a quarterly basis. These groundwater monitoring sites are depicted in Figure 3. On June 2nd 2023, DEC approved the amendment to update monitoring sites in response to the updated LAD design which removed MW-01 and MW-02 from monitoring plan and replaced them with MW-04-S and MW-05 (Figure 4).

Water quality sampling and analytical procedures have been performed in accordance with Constantine's QAPP, prepared by Integral Consulting in 2018 and revised by HDR in October 2019 (as per Section 2.5.5.6 of the WMP). Samples are analyzed by ALS Environmental Laboratory for conventional parameters, settleable solids, cations/anions, total/dissolved metals following SM and EPA methods. Field

parameters including pH are also collected at each site during the sampling event (more detail is available in the Project QAPP).

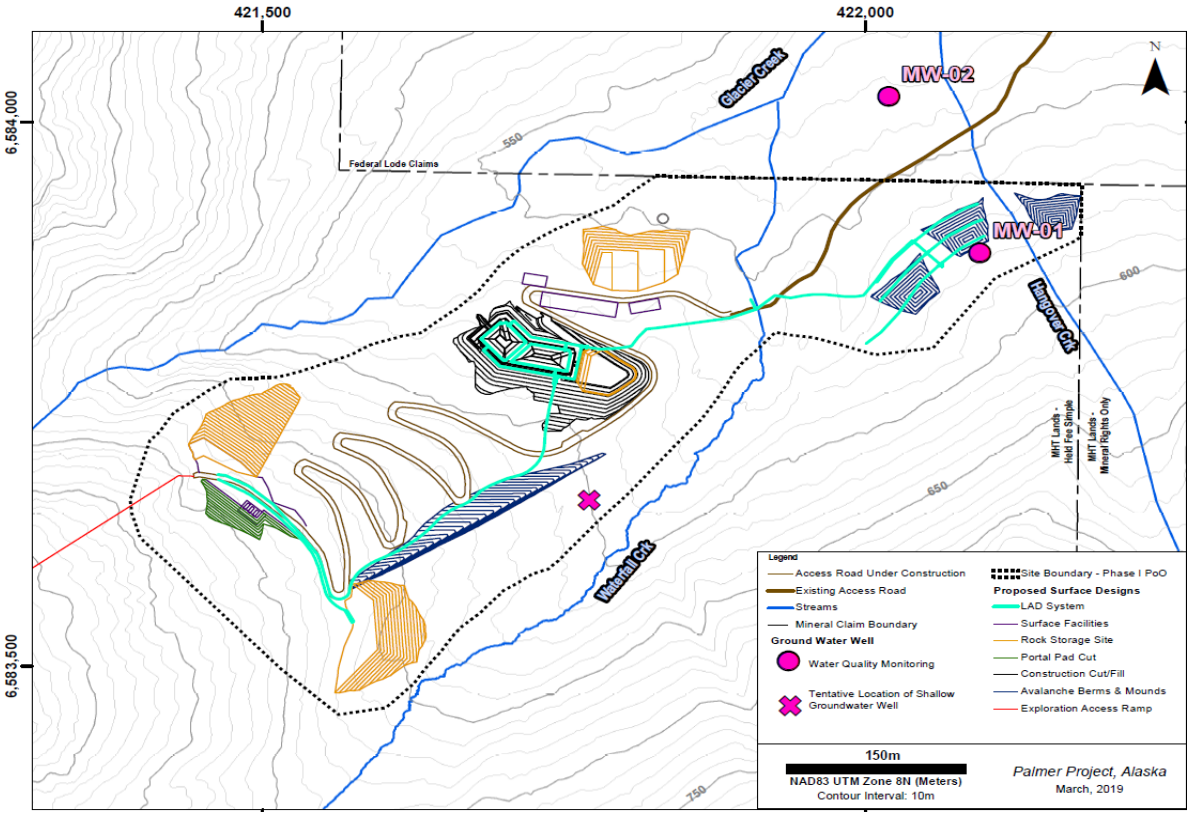


Figure 3 WMP Groundwater quality monitoring stations MW-01 & MW-02

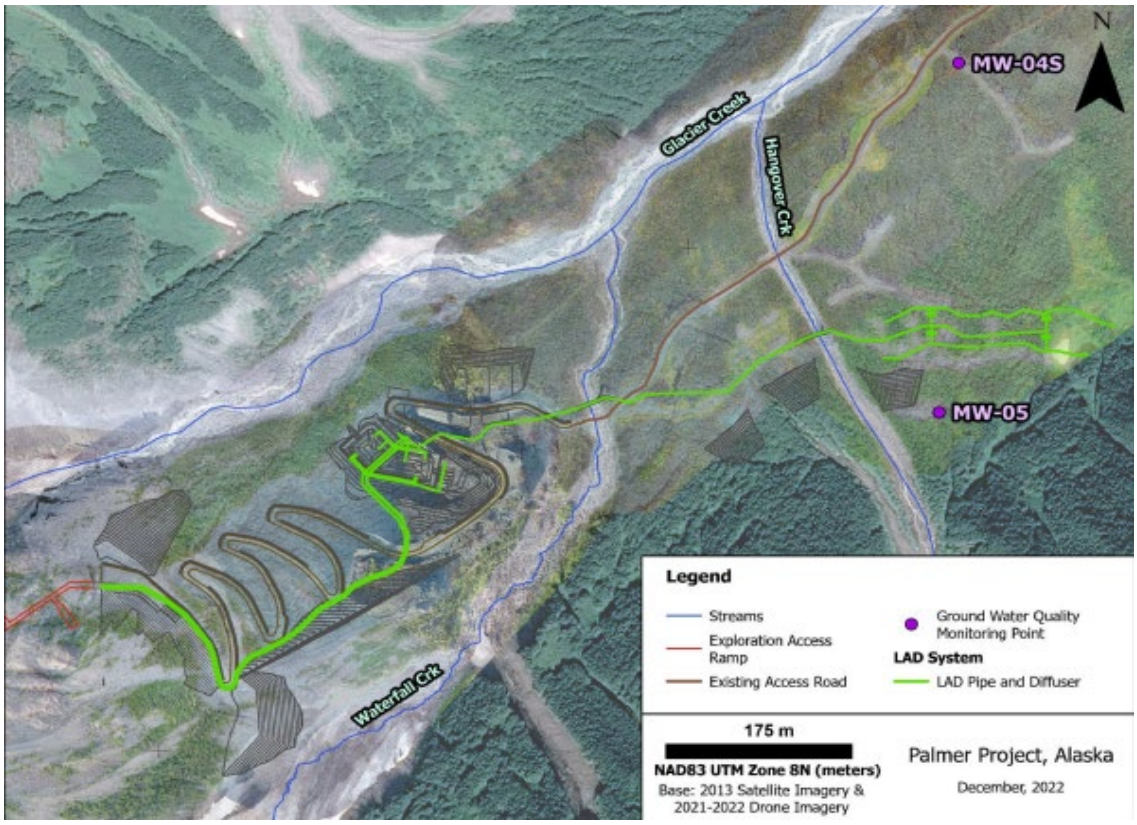


Figure 4 WMP Groundwater quality monitoring stations MW-05 & MW-04-S

Table 3 Groundwater Monitoring Stations

Station	Description	Date sampling initiated	No. of water quality sampling events
MW-04-S	Upgradient of proposed LAD lower diffuser	November, 2021	20
MW-05	Downgradient of proposed LAD lower diffuser	November, 2021	16

2.2.2 Water Quality

As per the amended WMP (Section 2.5.5.1) groundwater must be monitored on a quarterly basis at two well sites: MW-04S and MW-05 (Figure 4). MW-04S was sampled during the first quarter of 2025. Trigger limits have been developed for MW-04S (See Table 4). MW-05 was not sampled as a result of avalanche concerns.

MW-04S exceeded AWQS for Q1 for the following parameters: Aluminum, Cadmium, Copper, Iron, Lead, Manganese, Mercury, pH and Zinc.

Concentrations of water quality parameters at groundwater monitoring stations over time are presented graphically in Appendix A, and raw water quality data is digitally available in Appendix B.

Table 4 MW-04-S Q1 Water Quality Results Compared to WMP Trigger Limits

MW-04-S	Result	Trigger	Label
aluminum	**39.7**	15	mg/L
arsenic	7.04	10	µg/L
cadmium	**1.60**	0.4	µg/L
calcium	69.0	NA	mg/L
copper	**272**	53	µg/L
iron	**81.3**	29	mg/L
lead	**29.4**	6.2	µg/L
magnesium	38.9	NA	mg/L
manganese	**2480**	550	µg/L
mercury	**0.0728**	0.012	µg/L
nitrate as N	0.813 J	10	mg/L
pH	**6.26**	<6.5 or >8.5	s.u.
selenium	3.06	5	µg/L
sulfate	29.6	250	mg/L
total dissolved solids	192 J	500	mg/L
zinc	**567**	186	µg/L

2.2.3 Groundwater Level and Temperature

Groundwater depth and temperature has been voluntarily collected since well installation in November 2021. Groundwater depth is measured in each groundwater monitoring well once every 6 hours, using transducers installed at the bottom of each well. Pressure transducer depth is compensated using barometric pressure, and depths are verified with manual measurements of the water level recorded during each sampling event.

Groundwater level data was not downloaded during the Q1 sampling event but will be downloaded and updated in subsequent reports. Historically collected data for MW-04S and MW-05 can be found in Figures 5 and 6, respectively.

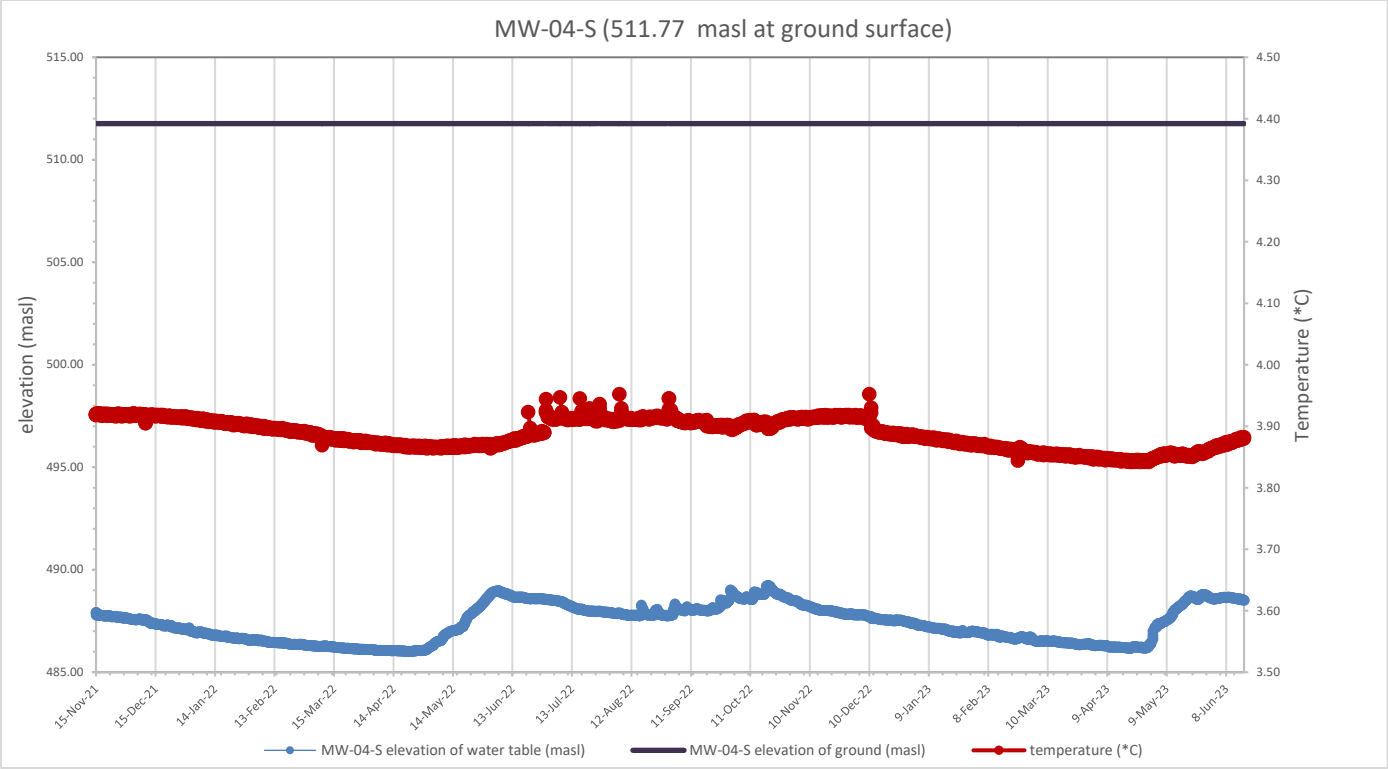


Figure 5 – Groundwater level and temperature over time

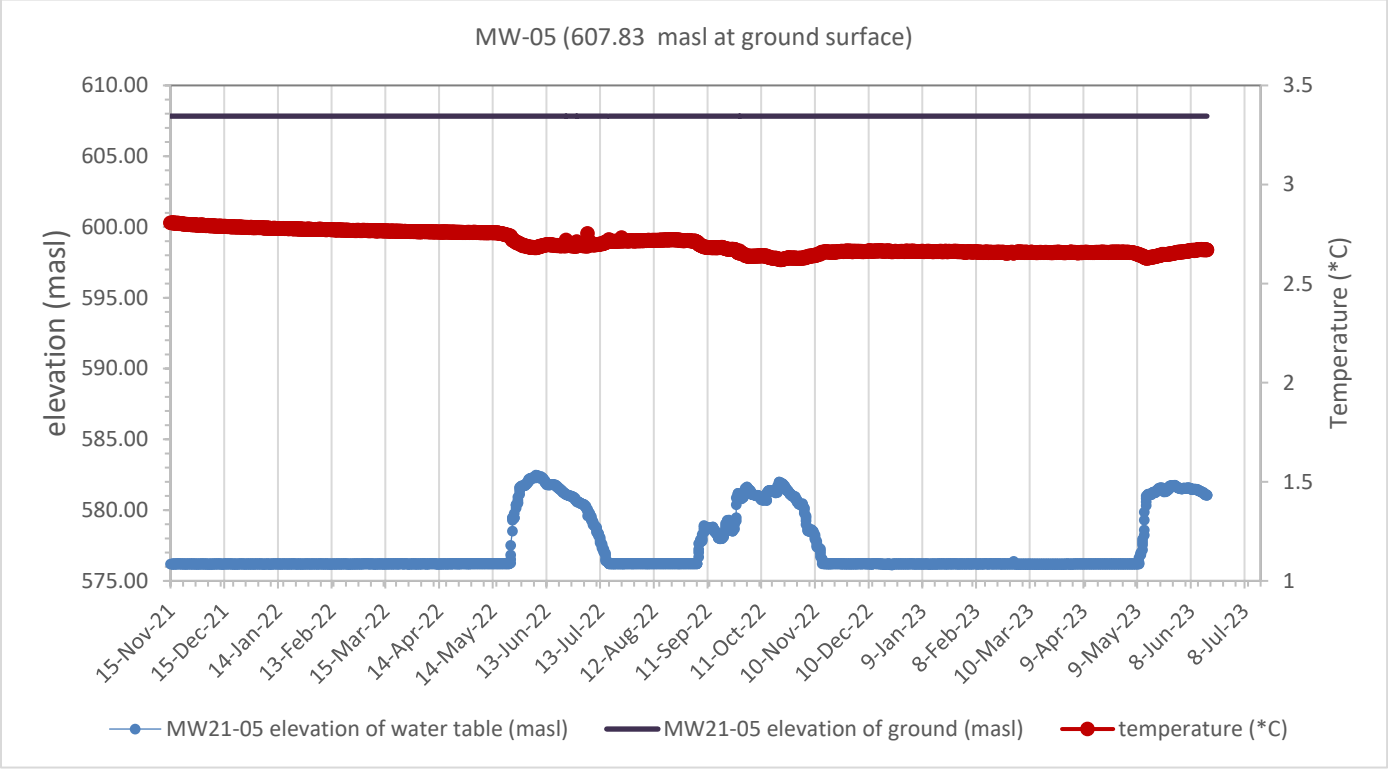


Figure 6 – MW-05: Groundwater level and temperature over time

2.3 Meteorological Monitoring

Constantine voluntarily collects hourly meteorological data from two stations in the Project Area. The most recent Annual Meteorological Report is available to regulators upon request.

3.0 OTHER COMPLIANCE ITEMS, UPDATES AND STUDIES

3.1 WMP COMPLIANCE

The following deliverables have been completed in compliance with the Waste Management Permit:

Table 5 – WMP Deliverables

	WMP Section	Detail
1	Section 2.5	The monitoring plan (initially submitted in March 2019) was updated and submitted to the DEC on October 15, 2019.
2	Section 2.5.5.6	An updated QAPP was finalized by HDR and submitted to DEC on October 15, 2019.
3	Section 2.6.2	A quarterly report summarizing monitoring activities for Q3 was submitted to DEC on November 29, 2019. This report included historical data; all stations were successfully sampled.
4	Section 2.6.3	An annual report summarizing 2019 monitoring activities (Q3 and Q4) was submitted to DEC on February 29th, 2020. This report included historical data.
5	Section 2.6.2	A quarterly report summarizing monitoring activities for Q1 was submitted to DEC on May 28, 2020. This report included historical data. Note that despite several attempts, only P27 was collected during the Q1 sampling event due to safety issues (avalanche and evolving COVID-19 situation)
6	Section 2.6.2	A quarterly report summarizing monitoring activities for Q2 was submitted to DEC on Aug 29, 2020. This report included historical data; all stations were successfully sampled.
7	Section 2.6.2	A quarterly report summarizing monitoring activities for Q3 was submitted to DEC on Nov 20, 2020. This report included historical data; all stations were successfully sampled.
8	Section 2.6.2	An annual report summarizing 2020 monitoring activities was submitted to DEC on February 27th, 2021. This report included historical data.
9	Section 2.6.2	A quarterly report summarizing monitoring activities for Q1 was submitted to DEC on May, 28, 2021. This report included historical data. Note that sampling for the first quarter of 2021 was not completed due to health and safety concerns in the field and complications due to the ongoing COVID-19 pandemic.
10	Section 2.6.2	A quarterly report summarizing monitoring activities for Q2 was submitted to DEC on August 28, 2021. This report included historical data; all stations were successfully sampled.
11	Section 2.6.2	A quarterly report summarizing monitoring activities for Q3 was submitted to DEC on November 4, 2021. This report included historical data; all stations were successfully sampled.
12	Section 2.6.3	An annual report summarizing 2021 monitoring activities was submitted to DEC on February 28th, 2022. This report included historical data.
13	Section 2.6.2	A quarterly report summarizing monitoring activities for Q1 was submitted to DEC on May 30, 2022. This report included historical data; all stations were successfully sampled.
14	Section 2.6.2	A quarterly report summarizing monitoring activities for Q2 was submitted to DEC on August 30, 2022. This report included historical data; all stations were successfully sampled.

	WMP Section	Detail
15	Section 2.6.2	A quarterly report summarizing monitoring activities for Q3 was submitted to DEC on November 30, 2022. This report included historical data; all stations were successfully sampled.
16	Section 2.6.3	An annual report summarizing 2022 monitoring activities was submitted to DEC on February 24, 2022. This report included historical data; all stations were successfully sampled.
17	Section 2.6.3	A quarterly report summarizing monitoring activities for Q1 was submitted to DEC on May 30, 2023. This report included historical data; all stations were successfully sampled.
18	Section 2.6.3	A quarterly report summarizing monitoring activities for Q2 was submitted to DEC on August 30, 2023. This report included historical data; all stations were successfully sampled.
19	Section 2.6.3	A quarterly report summarizing monitoring activities for Q3 was submitted to DEC on November 30, 2023. This report included historical data; MW-04S was successfully sampled, MW-05 was not because the well was dry.
20	Section 2.6.3	An annual report summarizing monitoring activities for Q4 and the 2023 season was submitted to DEC on February 14th, 2023. This report included historical data; MW-04S was successfully sampled, MW-05 was not because the well was dry.
21	Section 2.6.3	A quarterly report summarizing monitoring activities for Q1 was submitted to DEC in March of 2024. No sampling was conducted due to safety concerns.
22	Section 2.6.3	A quarterly report summarizing monitoring activities for Q2 was submitted to DEC in August of 2024. The report included historical data; MW-04S and MW-05 were both successfully sampled.
23	Section 2.6.3	A quarterly report summarizing monitoring activities for Q3 was submitted to DEC in November of 2024. The report included historical data; MW-05 was not sampled as it was dry.
24	Section 2.6.3	An annual report summarizing monitoring activities for Q4 and the 2024 season was submitted to DEC on February 14, 2025. This report included historical data; MW-04S and MW-05 were both successfully sampled.
25	Section 2.6.3	A quarterly report summarizing monitoring activities for Q1 was submitted to DEC in May of 2025. The report included historical data; MW-05 was not sampled due to avalanche concerns.

3.2 HYDROGEOLOGY WORK

Constantine conducted hydrogeological work in 2020 and 2021 to support the redesign of the Wastewater Discharge System. On April 14, 2022, Constantine formally requested an ADEC Nondomestic Wastewater System Plan Review of the updated design for the entire wastewater discharge system, including the design for the water treatment plant. On May 27, 2022, ADEC granted conditional approval to construct the redesigned Wastewater Discharge System. During the 2023 field season Constantine continued to monitor ground water level and temperature to build upon the hydrogeological dataset in the vicinity of the Wastewater Discharge System. In addition to the wells in the vicinity of the Wastewater Discharge System, Constantine voluntarily monitors water level and temperature in wells throughout the Project site.

4.0 SUMMARY

Construction of the revised Wastewater Discharge System, approved by the DEC was initiated in Q3 2022, with 80% of pond #1 excavated and minor grubbing and earthworks to prepare for pipeline installation.

No other earthworks related to the LAD construction were conducted. Therefore, visual, development rock, and water quality monitoring associated with proposed Project infrastructure has not yet begun.

Quarterly sampling was successfully completed at all locations in the first quarter of 2025 except MW-05 because of safety concerns related to potential avalanche. MW-04S exceed WMP trigger limits for aluminum, cadmium, copper, iron, lead, manganese, mercury, pH and zinc (Table 7).

Table 6 - Q1 WMP Trigger Limit Exceedances - MW-04S

MW-04-S	Result	Trigger	Label
aluminum	**39.7**	15	mg/L
cadmium	**1.60**	0.4	µg/L
copper	**272**	53	µg/L
iron	**81.3**	29	mg/L
lead	**29.4**	6.2	µg/L
manganese	**2,480**	550	µg/L
mercury	**0.0728**	0.012	µg/L
pH	**6.26**	<6.5 or >8.5	s.u.
zinc	**664**	186	µg/L

5.0 REFERENCES

ADEC 2008. Alaska Water Quality Criteria Manual for Toxic and Other Deleterious Organic and Inorganic Substances. Amended as of September 8, 2022. Available at: https://dec.alaska.gov/media/11546/alaska-water-quality-criteria- manual-for-toxic-and-other-deleterious-organic-and-inorganic-substances.pdf. Alaska Department of Environmental Conservation. September 2022.

ADEC 2020. 18 AAC 70 Water Quality Standards. Amended as of November 13, 2022. Available at https://dec.alaska.gov/media/eovgrgs5/18-aac-70.pdf Alaska Department of Environmental Conservation. November 2022.