



October 14th, 2022

W2021L2-0004, W2021L2-0005, W2021C0009

Mr. Ryan Fequet  
Executive Director  
Wek'èezhii Land and Water Board  
#1-4905 48th Street, Yellowknife, NT X1A 3S3

**Re: Response to Wek'èezhii Land and Water Board's Letter of September 1, 2022**

Dear Mr. Fequet,

As a follow-up to Nighthawk Gold Corp's (Nighthawk)'s September 30<sup>th</sup>, 2022 [submission](#), please find enclosed Nighthawk's revised responses to the July 21<sup>st</sup>, 2022, [letter](#) from the Wek'èezhi Land and Water Board (the Board) and as requested in the [letter](#) from the Board dated September 1, 2022 .

As stated in our September 30<sup>th</sup> submission, while it is anticipated that bulk sampling activities will be a component that will support future project development, at this stage in the engineering process, the key details regarding bulk sampling are not available in sufficient detail to meet the Board's requirements. As such, Nighthawk has removed bulk sampling from the current application, which is reflected in the attached response.

We trust that the attached response provides the clarification and information that the Board has requested; Nighthawk is available to discuss and provide additional information as the Board requires.

Sincerely,

John McBride P.Ge  
Vice President of Exploration  
Nighthawk Gold Corp.  
[jmcbride@nighthawkgold.com](mailto:jmcbride@nighthawkgold.com)



**1. Nighthawk is to:**

**a. Confirm whether it wishes to receive authorization to bulk sampling at any location within the Indin Project area;**

No, not at this time. Nighthawk will apply for an appropriate license/amendment for this activity if/when required at a later date.

**b. Provide the maximum number of locations where bulk sampling may take place over the life of the project;**

Exploration and resource delineation is currently at early stages, so providing specific locations for hypothetical bulk sampling isn't possible at this stage in the project development. If/when Nighthawk seeks an amendment and/or the appropriate approval for bulk sampling this information will be provided to the Board.

**c. At a given location, provide the maximum tonnage of bulk sampling and the maximum number of samples;**

Bulk sampling is no longer being proposed at this time for this Water License amendment.

**d. Provide the maximum total tonnage of bulk sampling for the Project; and**

Bulk sampling is no longer being proposed at this time for this Water License amendment.

**e. Describe the potential impacts and mitigations associated with the maximum extent of bulk sampling.**

A full description will be provided when Nighthawk has certainty regarding bulk sampling locations and volumes. This information will be provided if/when Nighthawk seeks the appropriate approvals for bulk sampling.

**2. Nighthawk to consider the above and propose a definition for Bulk Sampling.**

The definition proposed by the Board is the following:

*Bulk Sampling: The removal of a rock sample greater than 1 tonne by trenching, diamond drilling, or reverse circulation drilling, up to a maximum of 100 tonnes per sample.*

While Nighthawk is not proposing to conduct bulk sampling as part of this revised application, the removal of small amounts of rock core obtained by diamond drilling for geochemical testing and assaying is a routine part of mineral exploration. As such, more than 1 tonne may be removed in aggregate during the exploration field season. To facilitate this and provide clarity for the Board and Nighthawk, the following definition is proposed:



*Bulk Sampling: The removal of a rock sample greater than 1tonnes by trenching or large diameter reverse circulation drilling, up to a maximum of 100 tonnes per sample.*

Nighthawk is currently using NQ sized diamond drills (approximately 3 inches in diameter) to conduct exploration operations, which is typical of exploration operations in the Northwest Territories and other territorial and provincial jurisdictions. Using this definition, any sampling completed using trenching or large diameter reverse circulation drilling would be considered Bulk Sampling.

Nighthawk requires the ability to conduct typical exploration activities such as diamond drilling and core retrieval, so that the project and associated resources can be defined and delineated, while developing the scientific information needed to provide the Board the data required to support a future application or amendment. This definition will allow Nighthawk the ability to conduct routine exploration activities while giving the Board the certainty required regarding operations.

This definition also will allow Nighthawk to commit to the condition provided in Item 6 provided by the Board in the July 21<sup>st</sup> letter, which is discussed in Item 6 below. If this exploration core is not removed off site, the core would have to be stored on surface in an orderly fashion in covered enclosed core boxes.

**3. Nighthawk is to clarify whether trenching beyond Bulk Sampling, as defined in #[2] above is proposed.**

Trenching will only occur for bulk samples (using the definition Nighthawk has provided in item 2 above).

**4. Nighthawk is to provide a closure cost estimate to cover the maximum liability associated with bulk sampling at any time during the Project (as described in #1 above).**

If/when Nighthawk applies for an amendment/new application to conduct bulk sampling, a revised closure cost estimate will be provided as part of the amendment/new application. At this time as we have revised our application to not conduct bulk sampling activities, therefore, an estimate of maximum liability for bulk sampling isn't required at this time.

**5. Nighthawk is to consider the above proposed condition and comment on the proposed condition to prohibit the deposit of waste rock and ore.**

Nighthawk has reviewed the proposed condition and agrees at the current time. It should be noted that in the future Nighthawk may apply for bulk sampling under an amendment/new application, which may result in this condition being revised with the Boards approval.

**6. Nighthawk is to clarify whether any temporary storage of waste rock or ore may be required and if so, describe how this activity could be consistent with #5 above (i.e., maximum duration of any temporary storage).**



In the absence of an emergency threatening life, property or the environment (as noted in section 17 of the Mackenzie Valley Land Use Regulations), Nighthawk does not foresee the requirement for temporary storage of waste rock or ore to be required during exploration conducted under this application. Any waste rock generated will be removed from site, which is not expected at this time. Exploration core stored on site will be stored as described in Item 2, on surface in an orderly fashion in covered enclosed core boxes in a well drained area.

**7. Nighthawk is to propose the schedule requirements for the Bulk Sampling Plan, including rationale for not providing location, for Parties consideration**

Nighthawk understands that the Board and key stakeholders require specific bulk sampling locations to evaluate the efficacy of any future bulk sampling programs. Nighthawk agrees with the proposed licence condition to provide the Bulk Sampling Plan to the Board for approval a minimum of 90 days prior to commencement of sampling activities.

**8. Nighthawk is to propose a trigger for the submission of, and updates to, the Bulk Sampling Plan.**

A draft Bulk Sampling Plan will be submitted as part of any future application/amendment that is provided to the Board. A final plan will be submitted to the Board 90 days prior to any proposed activities taking place.

**9. Nighthawk is to propose timing and requirements for the notification to the Inspector regarding bulk sampling.**

Nighthawk proposes to provide notification to the Inspector at least 30 days before any individual Bulk Sampling event.

**10. Nighthawk is to consider the above non-standard condition and propose an alternative condition to be included in the Non-federal Licence and address the GNWT-ENR's concerns if it does not agree with the above.**

Nighthawk notes that there is no Part H, Condition 12 in the draft Non-federal Licence. Assuming the proper reference is to Part F, Condition 12, then Nighthawk agrees with the inclusion of the Board's proposed nonstandard condition in the Non-federal licence.