

DATE: February 3, 2026

TO: Public Registry

FROM: Jennifer Winsor, P. Eng.
Senior Environmental Engineer
Industrial and Wastewater Section

SUBJECT: File No. 5463.10 - Minago Development GP Inc.– Minago Mining Project – Information for Public Registry

The attached material can be placed in the public registries for the above project:

Technical Advisory Committee Comments (13 pages)

Environment, Climate and Parks, Office of Drinking Water – August 5, 2022

Natural Resources and Northern Development, Petroleum – August 5, 2022

Environment, Climate and Parks, Drainage and Water Rights Licensing Branch – August 8, 2022

Environment, Climate and Parks, Water Quality Management Section – August 15, 2022

Natural Resources and Northern Development, Wildlife and Fisheries Branch, Wildlife – August 23, 2022

Natural Resources and Northern Development, Forestry and Peatlands Branch - August 18, 2022

Natural Resources and Northern Development, Lands and Planning Branch – August 19, 2022

Natural Resources and Northern Development, Mining, Oil and Gas – August 19, 2022

Sport, Culture, Heritage and Tourism, Historic Resources Branch – August 18, 2022

Municipal Relations, Community Planning Branch – August 16, 2022

Infrastructure and Transportation – August 26, 2022

Winsor, Jennifer

From: +WPG530 - Drinking Water - Approvals (CC)
Sent: August 5, 2022 1:35 PM
To: Winsor, Jennifer
Subject: RE: Notice of Alteration for TAC Review - Minago Mine - File No. 5463.10

No concerns.
Office of Drinking Water (ODW)

Cory Vitt, CMMA M.Eng. P.Eng.

(pronouns: they/them; please don't use "Mr. Vitt")

Approvals Engineer
Office of Drinking Water
Environment, Climate and Parks
1007 Century Street
Winnipeg, Manitoba R3H 0W4
Cell: 204-806-1363
Email: Cory.Vitt@gov.mb.ca

Winsor, Jennifer

From: Mraz, Peter
Sent: August 5, 2022 11:28 AM
To: Winsor, Jennifer
Cc: Williams, Lisa
Subject: RE: Notice of Alteration for TAC Review - Minago Mine - File No. 5463.10

Petroleum Branch has no concerns since there no known oil and gas deposits or infrastructure impacted by the proposal.

Peter Mraz, P. Eng.
Manager Regulatory Services
Mining, Oil and Gas
Natural Resources and Northern Development
360 - 1395 Ellice Avenue
Winnipeg, Manitoba
R3G 3P2

Bus: (204) 945-6576
Cell: (204) 792-4136
Peter.Mraz@gov.mb.ca

Winsor, Jennifer

From: Wiseman, Kylene
Sent: August 8, 2022 2:42 PM
To: Winsor, Jennifer
Cc: Hay, David
Subject: FW: Notice of Alteration for TAC Review - Minago Mine - File No. 5463.10

Good afternoon Jennifer,

Since this project will involve groundwater dewatering activities, Flying Nickel Mining Corp. is required to apply for a Water Rights Licence under The Water Rights Act. An application can be submitted via our online portal – www.manitoba.ca/waterlicensingportal

Thank you,
Kylene Wiseman, P.Geol.

Drainage and Water Rights Licensing Branch
Environment, Climate and Parks
Kylene.Wiseman@gov.mb.ca / Cell: 431-337-7946
Box 16 - 200 Saulteaux Crescent Winnipeg MB R3J 3W3



Environment, Climate and Parks

Water Science and Watershed Management Branch

Box 14, 200 Saulteaux Crescent, Winnipeg, Manitoba, Canada R3J 3W3

T 204-945-0002 F 204-948-2357

www.manitoba.ca

August 15, 2022

Jennifer Winsor, P.Eng.

Senior Environmental Engineer, Environmental Approvals Branch

Manitoba Environment, Climate and Parks

Jennifer.Winsor@gov.mb.ca / Ph: 204-945-7012

1007 Century Street, Winnipeg, MB R3H 0W4

Dear Jennifer,

On behalf of the Water Quality Management Section (WQMS) at Manitoba Environment, Climate and Parks (ECP), the notice of alteration (NOA) to Environment Act License No. 2981, as provided by the Flying Nickel Mining Corp. (Flying Nickel) on July 21, 2022 was reviewed. This NOA is related to the proposed changes to the Minago Nickel Project which plans to produce nickel concentrate and frac sand. The WQMS would like to offer the following comments from a water quality perspective.

In general, the WQMS is supportive of the changes to the development and operating plan as proposed by Flying Nickel, which builds upon plans outlined in the 2010 Environment Act Proposal and 2014 NOA submitted by Victory Nickel (the previous owner of the project). One of the major changes that Flying Nickel is proposing is the use of a three-component semi-passive water treatment system to manage water parameters of concern and to ensure that water quality in the Minago River is protected, and that they are in compliance with the terms of EAL No. 2981. Flying Nickel completed a water quality modeling exercise which indicated that water quality conditions in the Minago River would deteriorate unless a treatment system was implemented. The modeling exercise showed that several metals including aluminum (Al), copper (Cu), iron (Fe), nickel (Ni), and selenium (Se) would become a problem exceeding aquatic life criteria in the Minago River during average and low flows throughout the life of the project. Flying nickel is planning to complete an updated feasibility study in November 2022 that would include engineering designs of the treatment system addressing concerns related to the quality of mine contact water discharged to the Minago River. The WQMS is interested in reviewing the feasibility study once available.

The water quality data used to assess baseline conditions in the Minago River, and used in the water quality model to assess impacts of the project, derive from monitoring surveys that occurred from 2006 to 2008. While a sufficient number of samples were collected from the Minago River in the early 2000s during the freshet and summer seasons, a single sample represents the winter season. This single sample represents a snap-shot in time and should not be used solely to represent baseline conditions in the Minago River in the winter. It is recommended that additional water samples be collected and analyzed during the summer, winter, and freshet of 2022/23, upstream and downstream of the proposed project site in the Minago River, to better characterize existing / baseline conditions prior to the start of construction.

Water quality information used in the water quality model was limited to 13 metals/metalloid parameters based on geochemical analyses of the various mine waste materials. Additional water quality parameters were analyzed in samples collected in the early 2000s; however, these were not included in the modeling exercise. Note that some of the parameters required to be analyzed as part of the Metal and Diamond Mining Effluent Regulations (MDMER) were not included in a modeling exercise assessing effects of the project (e.g., radium, pH, total suspended solids [TSS], and ammonia). It is recommended that additional water samples collected in 2022/23 be analyzed for general chemistry (e.g., hardness, TSS, etc.), ionic constituents (e.g., calcium, magnesium, potassium, sodium, chloride, sulphate, etc.), nutrients (e.g., nitrogen, nitrate, ammonia, phosphorus, orthophosphate, etc.), metals (total and dissolved; complete scan including Hg), and carbon (e.g., dissolved organic carbon, total carbon, etc.). Field measurements such as temperature, pH, dissolved oxygen, and conductivity should also be collected in the river while sampling in 2022/23. The WQMS is concerned that other parameters, aside from the few metals discussed in the Flying Nickel NOA, may exceed aquatic life guidelines in the river as a result of the project. The list of parameters to be analyzed should follow the Effluent and Water Quality Monitoring Studies as outlined in MDMER. An expanded list would also support Environmental Effect Monitoring studies in the future for characterizing baseline conditions. More recent water chemistry data, should be incorporated into the water quality model to confirm that exceedances of provincial guidelines and objectives for the protection of aquatic life will not occur during the life of the project. It is recommended that Flying Nickel provide a more detailed baseline assessment of water quality conditions in the Minago River based on data collected from the 2006-2008, and 2022-23 surveys.

The results from the 2006-2008 study also showed some issues with quality assurance/quality control. For example, in some cases, dissolved fractions were measured to be higher than the total fraction; including for some of the parameters used in the Flying Nickel water quality modeling exercise. In addition, some of the detection limits used by the laboratory were high (exceeding some Manitoba Water Quality Standards, Objectives and Guidelines [MBWQSOGs]). Careful review of the detection limits used by the laboratory should be conducted prior to sampling and analyses in 2022/23 analyses. Detection limits should not exceed provincial (MBWQSOGs, federal (Canadian Council of Ministers of the Environment [CCME]) aquatic life guidelines, or limits set out in the MDMER.

The Flying Nickel NOA mentioned that groundwater will be discharged to the Minago River, as noted in Section 4.4.2 above. However, Section 4.4.2 does not exist in the report. The project is anticipated to require substantial groundwater withdrawals both to reduce the inflow of groundwater to the open pit and to remove any groundwater seepage from the open pit. It is understood that groundwater affecting the project is to be transported to a settling pond before being discharged to the swale that flows to the Minago River. Was this groundwater discharge incorporated into the water quality model?

Should you have any questions with regard to this information, or identify data that may be anomalous, please do not hesitate to contact our section at the above address, or by e-mail at Andrew.Burton@gov.mb.ca.

Sincerely,

Andrew Burton, M.Sc., P. Ag.
Senior Water Quality Specialist at Manitoba Environment, Climate and Parks

Memorandum

Date: Aug 23, 2022

To: Jennifer Winsor
Senior Environmental Engineer
Environmental Approvals Branch
Jennifer.Winsor@gov.mb.ca

From: Brian Kiss
Habitat Mitigation Biologist
Wildlife Branch
Brian.Kiss@gov.mb.ca

Subject: File: 5463.10 – Minago Mine Notice of Alteration

The Wildlife Branch has reviewed the Notice of Alteration Proposal for File 5463.10 and would like to provide the following comments:

The new NOA states:

“Reviewer comments on the 2014 NOA requested a survey of the limestone ridges for the presence/absence of rare fern species in relation to the planned relocation of the TWRMF, which can occur in this habitat type in Manitoba. A fern survey has been commissioned for spring 2022 and findings will be reported as soon as they are received.

The vegetation community in the area of Polishing Ponds A and B and along the discharge route is within the Local Study Area that was previously assessed in the 2010 EAP and 2014 NOA. No unique vegetation communities or vegetation species at risk were identified in this area.”

and

“Reviewer comments on the 2014 NOA requested a survey for the presence/absence of bat hibernacula along the limestone ridges that will be used for the TWRMF. A survey has been commissioned for spring 2022 and findings will be reported as soon as they are received.”

We ask the results of these surveys be shared with the Wildlife Branch prior to approval, and that any bat or snake hibernacula observed be buffered by an appropriate distance determined through discussions with Wildlife Branch staff.

Thank you.



Brian Kiss

cc. Lindsey Bylo, Northwest Regional Wildlife Manager – Lindsey.Bylo@gov.mb.ca
Vicki Trim, Northeast Regional Wildlife Manager – Vicki.Trim@gov.mb.ca

Winsor, Jennifer

From: Porteous, Marianne
Sent: August 18, 2022 11:28 AM
To: Winsor, Jennifer
Cc: Kortz, Shauna
Subject: RE: Notice of Alteration for TAC Review - Minago Mine - File No. 5463.10

Hi Jennifer,

A shapefile will be required of the areas being cleared so a Timber Damage Appraisal (TDA) can be completed prior to any cutting/bulldozing.

The regional contact for the TDA is Shauna Kortz (cc'd) here.

Thank you,
Marianne

DATE: August 19, 2022

TO: Jennifer Winsor
Senior Environmental Engineer
Environmental Approvals Branch
Manitoba Environment, Climate and
Parks
1007 Century Street
Winnipeg, MB R3H 0W4

FROM: Michelle Méthot
A/Manager
Lands and Planning Branch
Natural Resources and Northern Development
200 Saulteaux Cres
Winnipeg, MB R3J 3W3

PHONE NO.: 204-792-2025

EMAIL: michelle.methot@gov.mb.ca

SUBJECT: Notice of Alteration for TAC Review - Minago Mine - File No. 5463.10

Manitoba Natural Resources and Northern Development, Lands and Planning Branch, has reviewed the Notice of Alteration for TAC - Minago Mine - File No. 5463.10 and has the following comments:

- Flying Nickel should provide a map of the proposed site layout to the Lands and Planning Branch and the Mining, Oil and Gas Branch. The map should clearly identify accurate tenure information. If Crown land tenure is required, Flying Nickel should apply for surface tenure under *The Mines and Minerals Act*.
- There is an existing Crown Land General Permit for the purpose of an access road on the site. An Application for Assignment of Permit is required to transfer the permit from the existing permittee (Silver Elephant Mining Corp.) to the new holder (Flying Nickel Mining Ltd.). The Application for Assignment of Permit, Lease or Licence of Occupation under *The Crown Lands Act* C340 is attached.
- A Work Permit is required for work conducted on Crown lands. Work Permits must be obtained prior to the commencement of onsite activity including auxiliary activities (e.g., road/access development or improvement, campsite setup/establishment). A Work Permit application form can be downloaded from the following link or an application can be obtained from any Natural Resources and Northern Development (NRND) District Office.
https://residents.gov.mb.ca/file?id=697607&key=LABEL_FILE_PRINT_FILL&index=0

Michelle Méthot
A/Manager

TD

DATE: July 19, 2022

TO: Jennifer Winsor, P. Eng
Senior Environmental Engineer
Environmental Approvals Branch
Manitoba Environment, Climate and Parks
1007 Century Street
Winnipeg, MB R3H 0W4

FROM: Omkar Beruar, P. Eng
Chief Mining Engineer
Mining, Oil & Gas | Natural Resource and
Northern Development
Mines Safety | Workplace Safety and
Health | Labour, Consumer Protection and
Government Services
360 - 1395 Ellice Avenue
Winnipeg, MB R3G 3P2
PHONE NO.: 204-945-6517
EMAIL: omkar.beruar@gov.mb.ca

SUBJECT: Notice of Alteration for TAC Review - Minago Mine - File No. 5463.10

Manitoba Natural Resources and Northern Development, Lands and Planning Branch, has reviewed the Notice of Alteration for TAC - Minago Mine - File No. 5463.10 and has the following comments:

Respecting land/mineral tenure:

- The client is to provide an updated composite/integrated survey map/plan encompassing the entire footprint of the proposed project as described in the 2014 NOA.
- The proposed project foot print boundary to indicate all the details of the land /mineral tenure (Surface Lease/Quarry Lease/Mineral Lease/Claims etc) on the map on the same scale as above.
- Note: This needs to be confirmed and coordinated with Lands Branch whether a Surface Lease will be required in addition to ML

Respecting effluent characteristics:

- To determine the acid generating potential (include test results) for all the rock units and find acid/base balance for the mine effluents

Respecting closure and financial security:

- To submit and have approved a closure plan for the project as well have a financial security in place prior to any construction or development on the site

Omkar Beruar

Omkar Beruar

Cc: Lori Stevenson, Director of Mines, Mining, Oil and Gas Branch NRND
Pam Fulton-Regula, Manager of Tenure Services Mining, Oil and Gas Branch NRND
Michele Methot, A/Manager, Lands and Planning Branch, NRND

DATE: 2022-08-18

TO: Environmental Approvals Branch
Environment Climate and Parks

FROM: Archaeological Assessment Services Unit
Historic Resources Branch
Main Floor – 213 Notre Dame Avenue
Winnipeg, MB R3B 1N3

CC Flying Nickel Mining Corp.

T: (204) 945-2118 **F:** (204) 948-2384
e: HRB.archaeology@gov.mb.ca

SUBJECT: Notice of Alteration – File No. 5463.10
Flying Nickel Mining Corp. Minago Mine Project
HRB File AAS-22-19346

Conditional Approval – Implement a heritage resource management plan (HRMP)

Further to your e-mail regarding the above noted application, the Manitoba Historic Resources Branch (HRB) has examined the location in conjunction with Branch records for areas of potential concern.

Since the TAC review of the Environmental Act License 5463.10 in 2014, rare, and globally significant paleontological Heritage Resources have been identified in the dolomite bedrock near the project footprint. These factors, although not exclusive to the analysis, indicate a reason to believe that any future planned ground disturbance, activity, and/or development within the area has the potential to impact heritage resources, therefore, the Historic Resources Branch has concerns.

Legislation

Under Section 46 and 51 of the Heritage Resources Act (the Act), if at any time, heritage resources are encountered in association with these lands during testing and development, there is an obligation to report any heritage resources and a prohibition on destruction, damage or alteration of said resources. HRB may require that an acceptable heritage resource management strategy be implemented by the proponent/developer to mitigate the effects of their activity on the heritage resources.

Under Section 12(2) of the Act, the minister may require such other plans, documents, material and information, with respect to the work, activity, development or project, prior to commencement.

A copy of this legislation can be found at this address:

- <https://web2.gov.mb.ca/laws/statutes/ccsm/h039-1e.php>.

Heritage Resource Management Plan

The Branch will work with the proponent and its qualified palaeontological consultant to draw up terms of reference for this project. It should be expected that the HRMP will explore the following components:

- An evaluation of fossil preservation in the excavated bedrock, as it is removed from the work area.
- Operational procedures to limit damage or destruction of heritage resources, should they be encountered.

If you have any questions, please contact as above for proper assignment and queueing.

Historic Resources Branch
Archaeological Assessment Services Unit

Winsor, Jennifer

From: +THO407 - Thompson CRP
Sent: August 16, 2022 1:32 PM
To: Winsor, Jennifer
Subject: RE: Notice of Alteration for TAC Review - Minago Mine - File No. 5463.10

Hi Jennifer,

We are in receipt of the above noted Notice of Alteration for TAC Review – Minago Mine – File No. 5463.10 which involves relocating the tailings management area of the proposed Minago mine as an accommodation measure for Crown Indigenous Consultation, in order to finalize the revised licence for the project.

The subject property is located in unorganized territory. As such there are no applicable development plan policies or zoning bylaw regulations established in this area, and development is controlled by *The Planning Act, Provincial Planning Regulation Part 3, Provincial Land Use Policies, Section 4: Renewable Resources, Heritage & Recreation, and Section 8 : Mineral Resources*.

The site is to be the proposed location of the Minago Mine in the Thompson Belt. The following policies should be considered when reviewing this proposed development:

Section 4 - Renewable Resources, Heritage & Recreation

4.1.1 Provincial natural land and critical and significant wildlife habitat must be identified and protected from incompatible land uses and developments.

4.1.2 If the adverse impacts of development on provincial natural land and critical and significant wildlife habitat cannot be avoided, the impacts must be minimized and mitigated by using appropriate measures to preserve, create or restore the value of the land and habitat.

4.1.3 Provincial natural land and critical and significant wildlife habitat that have been degraded or damaged should also be identified and prioritized for rehabilitation, if rehabilitation is practicable.

Section 8 - Mineral Resources.

8.1.1 - Mineral, oil and natural gas resources, including lands containing high mineral potential, such as greenstone belts and the Thompson Nickel Belt, must be identified and protected from conflicting surface land uses that could interfere with access to the resources.

8.1.2 - Only uses that are compatible with exploration, extraction and development of the resources should be accommodated on lands adjacent to land identified under policy 8.1.1. In addition, appropriate buffers must be identified and enforced to ensure that adjacent land uses do not unduly restrict exploration, extraction and development.

8.1.3 - Without limiting policy 8.1.1, in accordance with the provincial designation of land respecting mineral, oil and natural gas resources, for an area of land designated as:

- a) "high", the dominant land use should be exploration and extraction; and
- b) "medium", conflicting surface land uses may be accommodated only after provincial consultation and approval.

8.1.4 - Mineral, oil and natural gas exploration and development is to be recognized as an interim land use. As such, a non-conflicting land use may be permitted for the surface of areas designated by the province as "high" or "medium" before development and extraction begins.

8.1.5 - The mineral tenure system and rights must be effectively integrated into land use and resource planning. Valid mineral access rights — including the right to enter, use and occupy the surface of land to prospect or explore for or develop, mine and produce minerals — must be honoured and appropriate security of tenure must be ensured.

8.1.7 - If extraction of minerals, oil or natural gas ceases on land, the surface of which was prime agricultural land before the extraction began, the land must be rehabilitated to the same average soil quality for agriculture as is found on the surrounding lands.

Having reviewed this application with consideration to Provincial Planning Regulations, specifically the policies contained in Section 8- Mineral Resource Planning, it is determined that the proposal will comply with the provincial regulations guiding it's development.

Community and Regional Planning have no concerns with the development as proposed, provided that the identified Provincial Planning Regulations will be met as part of this development, and that the proposed location will be able to sufficiently mitigate any potential negative by-products of the operation to be located on site without creating adverse effects on surrounding natural ecosystems.

Thanks

Bret Mack
Community Planning – Northern Region
Municipal Relations
604-800 Portage Avenue
Winnipeg, MB R3G 0N4
ph. 204.945.4988

Winsor, Jennifer

From: +WPG969 - MIT Environmental Services Section
Sent: August 26, 2022 9:31 AM
To: Winsor, Jennifer
Subject: RE: Notice of Alteration for TAC Review - Minago Mine - File No. 5463.10

Good morning,

Below are comments from the following MTI branches/sections:

- **Roadside Development**

We have conducted a review of the alteration to Minago Mine file 5463.10. We note that although the mine itself is outside the controlled area of PTH 6, an approved permit was issued for a temporary access onto PTH 6 in March of 2010. We note that there will be an increase in use of this temporary access and are unsure as to the timeline of this project (whether the access will be considered temporary).

- 1) Therefore, we require to developer to obtain a permit from our office for the increase in use of this access onto PTH 6. For permit information, please contact Sheena Del Rosario at 204-583-2433 or by email at Sheena.DelRosario@gov.mb.ca. Permit information and permit application forms can also be found at <https://www.gov.mb.ca/mit/hpd/permits.html>.

Please note the following statutory requirements affecting PTH 6.

Statutory Requirements:

Under the Transportation Infrastructure Act, a permit is required from Manitoba Transportation and Infrastructure to construct, modify, relocate, remove or intensify the use of an access. A permit is also required from Manitoba Infrastructure to construct, modify, remove or relocate a structure or sign, or to change or intensify the use of an existing structure (including the alteration of existing buildings) within the **38.1 m** (125 ft) controlled area from the edge of the highway right-of-way.

In addition, a permit is required from the Manitoba Transportation and Infrastructure for any planting placed within **15 m** (50 ft) from the edge of the right-of-way of this highway.

- **Northern Region**
No concern
- **Hydrologic Forecasting & Water Management**
No concern

Thank you for the opportunity to review and comment.
