

BERG COPPER PROJECT

Initial Project Description

September 2026

SURGE COPPER CORP

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Acronyms and Abbreviations

AIA	Archaeological Impact Assessment
AIR	Application Information Requirements
ALAN	Artificial Light at Night
AMEC	Associated Mining and Environmental Consultants Earth and Environmental
AOA	Archaeological Overview Assessment
ARD	Acid Rock Drainage
BC	British Columbia
CAC	Criteria Air Contaminant
CAO	Chief Administrative Officer
CBC	Canadian Broadcasting Corporation
CCN	Cheslatta Carrier Nation
CEA	Communications and Engagement Agreement
CN Railway	Canadian National Railway
Cooperation Agreement	Impact Assessment Cooperation Agreement between Canada and British Columbia
DFO	Fisheries and Oceans Canada
DPD	Detailed Project Description
EA	Environmental Assessment
EAA	*Environmental Assessment Act*
EAC Application	Environment Assessment Certificate Application
EAO	Environmental Assessment Office
ECCC	Environment and Climate Change Canada
EMA	*Environmental Management Act*
Engagement Plan, the	Berg Copper Project Engagement Plan
EV	Electric Vehicle
FNHA	First Nations Health Authority
FSR	Forest Service Road
GBA Plus	Gender-Based Analysis Plus
GHG	Greenhouse Gas
HADD	Harmful Alteration, Disruption or Destruction

HHRA	Human Health Risk Assessment
HSDA	Health Service Delivery Area
IA	Impact Assessment
IAA	*Impact Assessment Act*
IAAC	Impact Assessment Agency of Canada
IDF	Inflow Design Flood
IPD	Initial Project Description
ISED	Innovation, Science and Economic Development
LRMP	Land and Resource Management Plan
MCM	Ministry of Mining and Critical Minerals
MDMER	Metal and Diamond Mining Effluent Regulations
Mill	Mill and Processing Facilities
ML/ARD	Metal Leaching and Acid Rock Drainage
MOU	Memorandum of Understanding
NPAG	Non-Potentially Acid Generating
NRCan	Natural Resources Canada
NTB	Nee Tahi Buhn Indian Band
OCP	Official Community Plan
OW	Office of the Wet'suwet'en
PAG	Potentially Acid-generating
PEA	Preliminary Economic Assessment
PFS	Pre-Feasibility Study
Project, the	Berg Copper Project
PSTP	Package Sewage Treatment Plant
RDBN	Regional District of Bulkley-Nechako
ROM	Run-of-mine
RHA	Regional Health Authority
SACC	Strategic Assessment of Climate Change
SARA	*Species at Risk Act*
STFN	Skin Tyee First Nation
Surge	Surge Copper Corporation
TAC	Technical Advisory Committee

TCM	Thompson Creek Metals Company Inc.
TEM	Terrestrial Ecosystem Mapping
TK	Traditional Knowledge
TRL	Technology Readiness Level
TSA	Timber Supply Area
TSS	Total suspended solids
TWMF	Tailings and Waste Management Facility
VC	Valued Component
VOC	Volatile Organic Compounds
VWP	Vibrating Wire Piezometer
WFN	Wet'suwet'en First Nation
YLP	Yinka Dene Economic Development Limited Partnership

Symbols and Units

>	greater than
≥	greater than or equal to
%	percent
g	gram
ha	hectare
km	kilometre
kt/d	kilotonnes per day
m	metre
m^3	cubic metre
masl	metres above sea level
Mt	million tonnes
Mt/y	million tonnes per year
tpd	tonnes per day

1. Introduction

Surge Copper Corp. (Surge) is proposing the development and operation of the Berg Copper Project (Project), a greenfield project located approximately 80 kilometres (km) southwest of Houston, British Columbia (BC), accessed via approximately 116 km of existing forest service roads (Figure 1-1). The Project is located within the Wet'suwet'en Yintah (traditional lands). Surge is actively engaging with the Wet'suwet'en Hereditary Chiefs and Houses and other potentially impacted communities in the region, including the Witset First Nation, Wet'suwet'en First Nation, Nee Tahi Buhn Indian Band, Skin Tyee First Nation, and Cheslatta Carrier Nation.

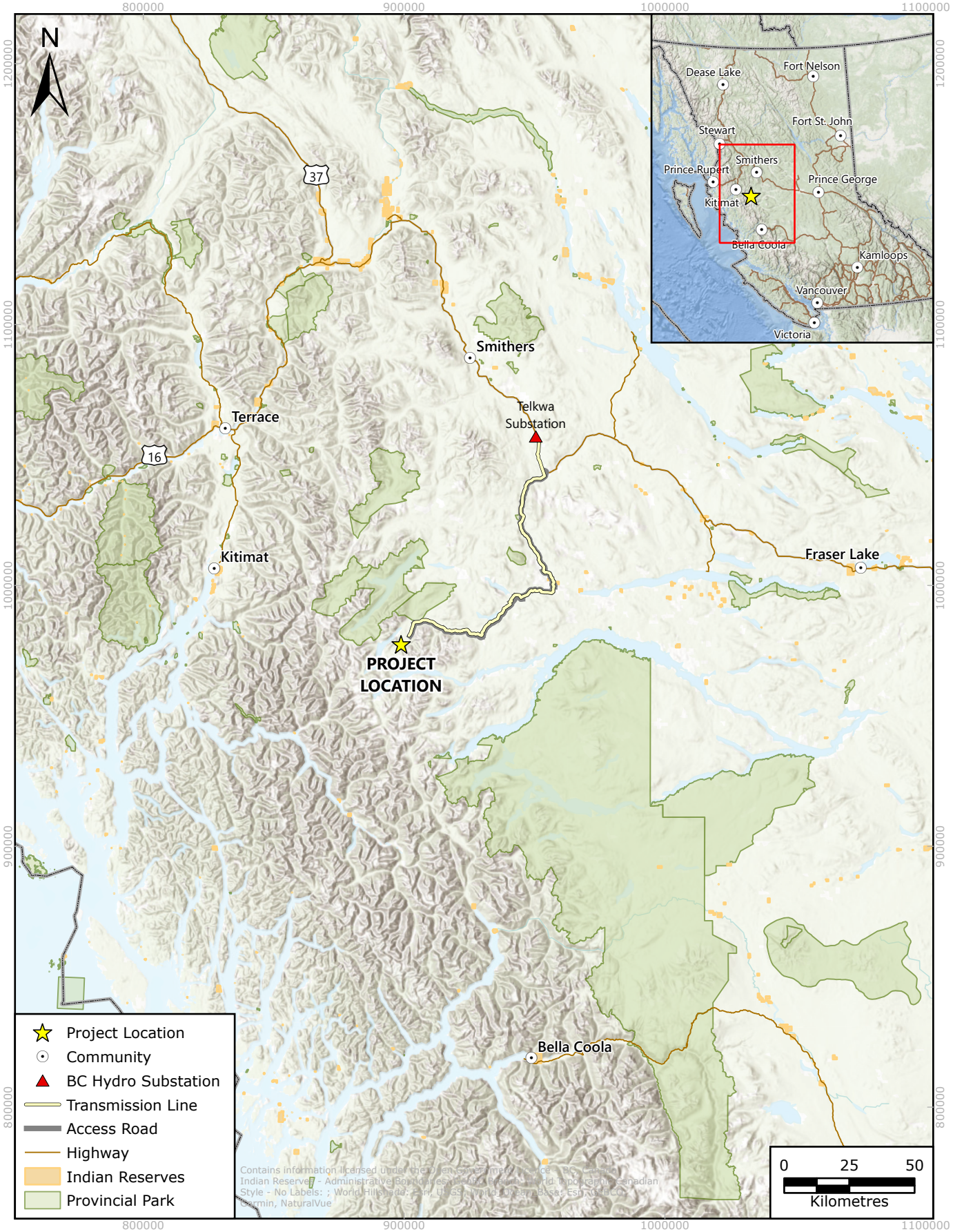
The Project is a potential future production source of copper, molybdenum, silver and gold. Copper and molybdenum are both federally and provincially recognized as critical minerals. The Government of Canada and the Province of BC have identified the development of secure and resilient critical mineral supply chains as a strategic priority. Critical minerals such as copper and molybdenum are foundational inputs to modern economies, supporting electricity and energy systems, transportation, communications, advanced manufacturing, aerospace, defence, and a wide range of other industrial applications. Increasing responsible Canadian production can strengthen domestic industrial capacity, reduce exposure to concentrated or disrupted global supply chains, and support Canada's role as a reliable supplier of essential materials to domestic industries, trading partners, and allies.

The Project aligns strongly with these national objectives as a potential supplier of copper, and molybdenum. When developed, the Project's copper output would rank among one of the largest in Canada. As such, the Project is well-positioned to become a cornerstone of Canada's strategy to expand critical mineral production and strengthen domestic supply chains.

The Project will include the construction, operation, decommissioning and reclamation of the following Project components:

- An open pit mine with average annual material movement of 118 million tonnes per year (Mt/y) ;
- Mill and processing facilities (Mill) operating at a throughput of approximately 120,000 tonnes per day (tpd) for the grinding and extraction of copper and molybdenum from the ore material;
- A crusher and electric overland conveyor transporting rock from the open pit location to the Mill;
- Accommodation Facility for the workforce; and
- A combined tailings and waste management facility (TWMF) for the long-term management of mine tailings and select waste rock.

FIGURE 1-1 LOCATION OF BERG COPPER PROJECT



CLIENT: Surge Copper
GIS NUMBER: BERG-15-014-02

DATE: 31 August 2026

PROJECTION: NAD 1983 BC Environment Albers
SCALE: 1:2,000,000 when printed at 8.5x11

The Mill will process ore using crushing, flotation, and dewatering to create separate concentrates containing copper, molybdenum, silver and gold. The copper concentrate will be transported from the Project site by a third-party to rail load-out facility and/or a port facility and then shipped to overseas customers. Molybdenum concentrate will be transported from the Project site by a third-party to rail load-out facility and/or a port and will either be transported to overseas customers or transported to one of several North American molybdenum roaster locations.

The Project will have four distinct phases, beginning with site preparation and ending with the completion of care and maintenance during post-closure (returning land use). The estimated duration of each key Project phase is:

1. **Site Preparation and Construction:** 3 years (inclusive of pre-production mining);
2. **Operations Phase:** 28 years;
3. **Closure Phase:** 2 years; and
4. **Post-Closure:** continue until conditions in permits are met.

The total open pit material mined is estimated at 3,618 Mt over the life-of-mine. Of the 3,618 Mt, 1,209 Mt is considered ore and 2,409 Mt is considered waste. The processing plant is designed for a nameplate capacity of 120,000 tpd, equivalent to an average annual mill feed of approximately 43.2 Mt/y, with peak throughput reaching 48.0 Mt/y during processing of the softer supergene ore. Peak total material movement, including ore and waste rock, is estimated at approximately 200.0 million tonnes per year. The Project contemplates a single pit design split into distinct phases that progress upon each other and do not necessitate large variances in production rates and as such it is expected that mined rates will remain relatively consistent throughout the operating life of the mine.

The Project is subject to both provincial environmental assessment and federal impact assessment (IA) legislation. Under section 3(1) and Table 6 of BC's *Reviewable Projects Regulation* (2019), a new mineral mine with a production capacity of 75,000 tonnes per year or more of mineral ore is a reviewable project. The Project's proposed production capacity exceeds this threshold and, accordingly, the Project is reviewable under BC's *Environmental Assessment Act* (EAA; 2018).

The Project also meets the criteria for a designated project under the federal *Impact Assessment Act* (IAA 2019). Paragraphs 18(c) and (d) of the Schedule to the *Physical Activities Regulations* apply, respectively, to a new metal mine with an ore production capacity of 5,000 tonnes per day or more and a new metal mill with an ore input capacity of 5,000 tonnes per day or more. The Project exceeds both thresholds. The purpose of this Initial Project Description (IPD) is to initiate the provincial EA and federal IA processes. This IPD provides an early Project overview intended to support collaboration with First Nations, government agencies, and the public during the Early Engagement phase of the regulatory process to identify engagement approaches, potential interests, issues, and concerns early in the EA process and chart a path for resolution.

As required under Section 13(1)(b) of the EAA, a companion document to this IPD, is the Berg Copper Project Engagement Plan (the Engagement Plan), the key parts of which are contained in this document and included as a concordance table as Appendix A. As required by the Impact Assessment Agency of Canada (IAAC), the IPD includes a summary of engagement (see Section 10, Summary of Engagement).

The IPD has been drafted in consideration of early discussions with, and provided for review by, the First Nations whose territorial land the Project falls within, including the Wet'suwet'en. In this document, "Wet'suwet'en" refers to all Wet'suwet'en People; specific Band-governed communities are referenced by name, with the Wet'suwet'en Band noted as "Wet'suwet'en First Nation." Project effects on Wet'suwet'en Rights and Interests are described and assessed with a focus on the Wet'suwet'en people as a whole.

The Project Assessment process, led by the Office of the Wet'suwet'en (OW), will be the primary means of substantively engaging the Wet'suwet'en Hereditary Chiefs and members of the Clans and Houses. Independent of that process, Surge will also engage the elected Chiefs and Councils of the previously mentioned communities. The OW process will be instrumental in sharing information, surfacing Wet'suwet'en interests, issues and concerns, and ensuring alignment on the Project as it advances through the provincial EA and federal IA processes. Surge continues to work with the Wet'suwet'en leaders and OW to determine how the Project Assessment process can potentially be more inclusive or complimentary to considering broadly the interests of the Wet'suwet'en people and communities.

It is anticipated that Surge will be further guided by BC's Environmental Assessment Office (EAO) through Early Engagement on First Nations that are considered a Participating First Nation as defined under the EAA (2018).

This IPD has been drafted with the preliminary engineering designs as informed by Surge's publicly released studies. The EA will be supported by environmental baseline studies and planned studies as laid out in this document. As part of the regulatory process, Surge expects to complete all necessary permitting and assessment approval processes, including alternatives assessment, return to land (closure planning) and financial commitments prior to the initiation of construction of the Project. Through the regulatory processes, the Project is expected to define, outline, and implement reasonable practices and mitigation measures to avoid and limit potential adverse effects to the environmental, economic, social, health, and heritage resources.

2. Proponent Information

Surge Copper Corp. ("Surge" or the "Proponent") is a Canadian public mineral exploration and development company headquartered in Vancouver, British Columbia, and listed on the TSX Venture Exchange under the symbol SURG. Surge has been actively exploring and advancing mineral projects in the region for more than a decade and holds a 100% interest in a contiguous mineral property package comprising the Berg Copper Project and the advanced-stage Ootsa Project. The properties are located within an established mining district in central British Columbia, adjacent to the Huckleberry Mine.

The relevant company contact details are as follows:

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3. Project Overview

This section provides an overview of the Project, outlining the need for the Project, as well as its purpose, potential benefits, location (including mineral tenures), mining history, status, and existing permits and approvals. For the IPD, the term "Project Area" is a collective term to describe an area that includes the Mine site footprint, associated facilities located nearby, including the TWMF, Freshwater Supply System, plus a 100 metre (m) buffer. The Project Area represents 5,009 ha (as shown on Figure 3-1).

3.1 Project Needs, Purpose, and Benefits

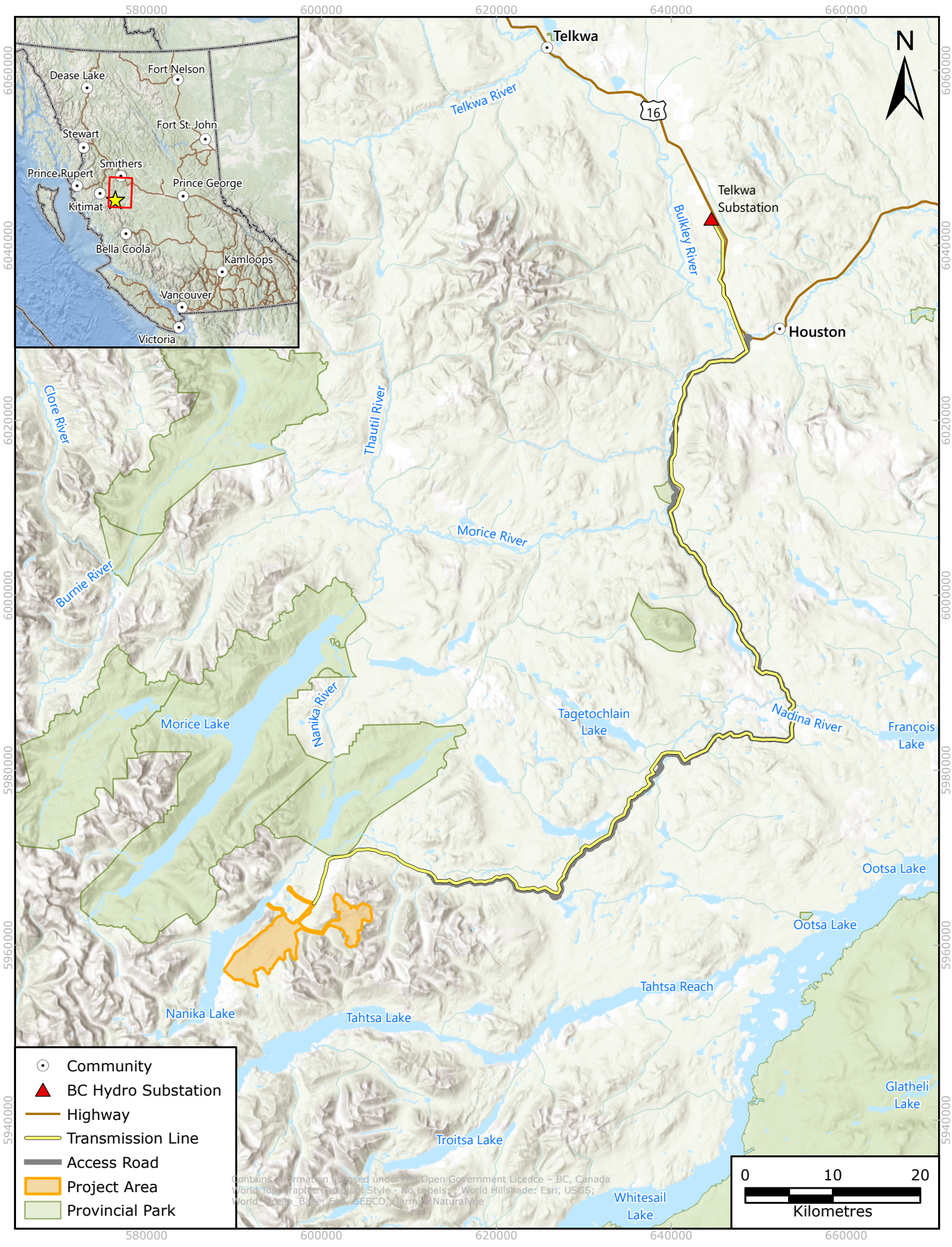
The Project would contribute to the growing demand for copper, molybdenum, and other critical minerals that are essential to modern infrastructure, energy systems, transportation, communications, advanced manufacturing, and other industrial uses. Demand for these materials is expected to increase as economies invest in new infrastructure, expand and modernize electrical systems, and adopt new technologies.

Canada and British Columbia have identified the development of secure and resilient critical mineral supply chains as an important economic and strategic priority. Developing new Canadian sources of copper and molybdenum would help strengthen domestic mineral supply, support Canadian industries and trading partners, and reduce reliance on concentrated or potentially disrupted international sources. The Project would contribute to these objectives by producing critical minerals in BC for use in Canada and global markets.

Over its estimated 28-year mine life, the Project is expected to produce approximately 4.9 billion pounds of copper and 602 million pounds of molybdenum. At the proposed production rate, Berg would become Canada's second-largest copper mine and its largest molybdenum mine, providing significant new supplies of both critical minerals to Canadian and global markets. The Project is also expected to produce approximately 89 million ounces of silver and 439,000 ounces of gold as by-products over the life of the mine.

The Project would also provide significant regional, provincial, and federal economic benefits over the construction, operations, and closure phases. At peak production in Year 5, the Project is expected to employ approximately 783 personnel including 719 hourly and 64 salaried employees. Over the life of the mine, the Project is anticipated to generate more than 20,000 person-years of employment, and contribute more than $3.2 billion dollars in wages to the Canadian economy. Surge has estimated that approximately 50% of the workforce could be sourced from the local and regional area. In addition to wages and associated income taxes, the Project is estimated to generate approximately $8.3 billion in total net taxes over the life of the mine, including approximately $5.9 billion to BC and $2.5 billion to the Government of Canada.

FIGURE 3-1 PROJECT AREA AND TRANSMISSION LINE



ERM

CLIENT: Surge Copper
GIS NUMBER: BERG-15-014-08

DATE: 27 August 2026

PROJECTION: NAD 1983 UTM Zone 9N
SCALE: 1:600,000 when printed at 8.5x11

Economic reconciliation with First Nations is an important priority in BC, and Surge is actively engaging with regional First Nations and their economic development organizations to support meaningful participation in the exploration, development, construction, and operation of the Project. This is anticipated to include employment of Indigenous people as well as opportunities for First Nation-owned businesses to participate in the approximately $4.7 billion of initial capital investment and $1.7 billion of sustaining capital associated with the Project. Surge has been engaging suppliers, contractors, and consultants that have joint-ventures, memoranda of understanding, or other business relationships with First Nations. These arrangements can provide practical opportunities to increase local and First Nation participation in Project-related contracting and procurement. Surge intends to continue working with First Nations to identify opportunities for First Nation-owned businesses to participate as suppliers and service providers during both Project development and operations. The Project therefore represents a significant opportunity to support economic reconciliation and Indigenous economic participation in the region.

The purpose of the Project is to construct, operate, and reclaim a mine in a manner that supports these objectives and is consistent with the principles of the Canadian Minerals and Metals Plan (Government of Canada 2019). In doing so, the Project would contribute to economic growth and prosperity in north-central BC and Canada, while meeting BC's high environmental standards for construction, operation, and closure.

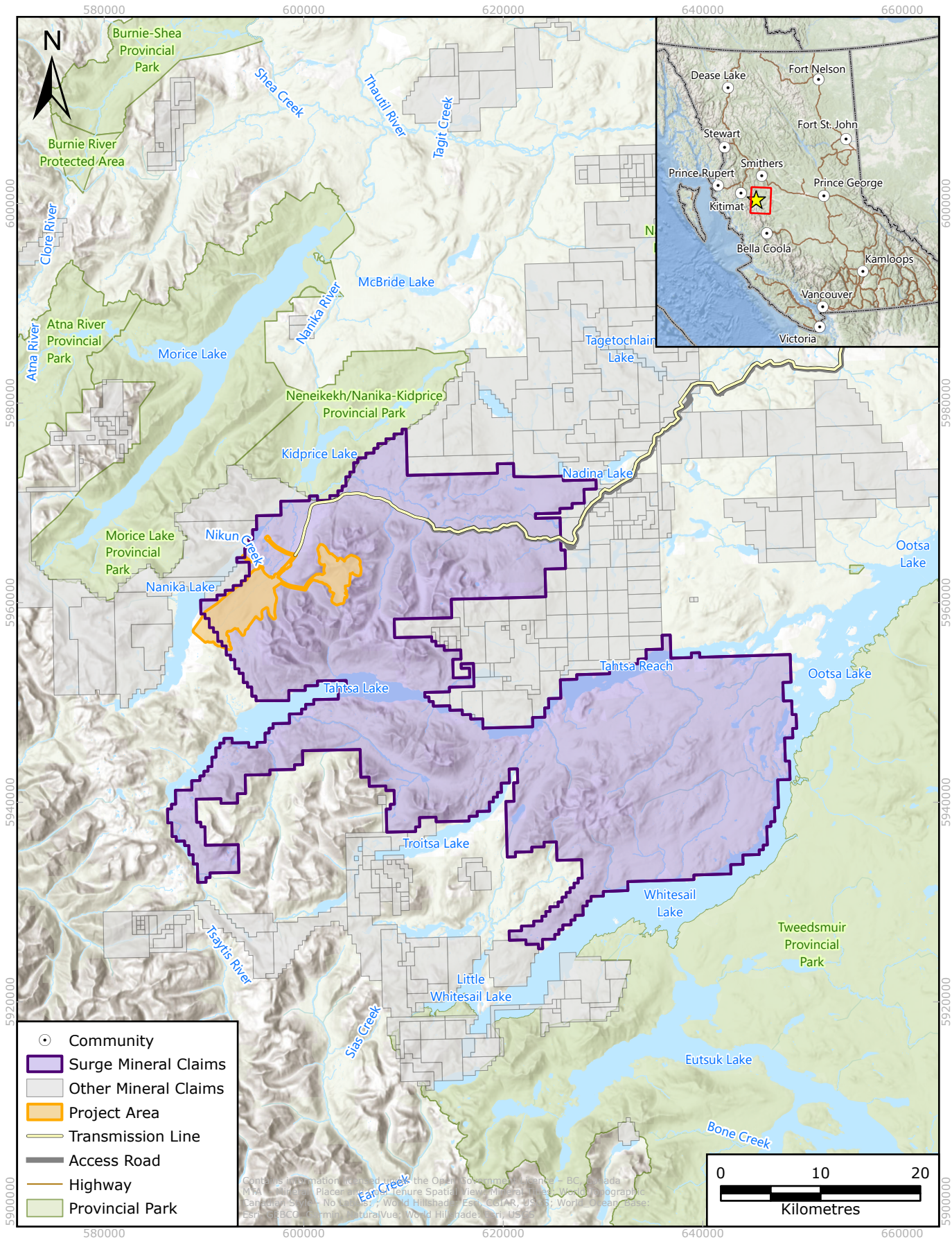
3.2 Project Location

The Project is located approximately 80 km Southwest (approximately 116 km by existing forest service roads) of Houston, BC (refer to Figure 1-1 and Figure 3-1). The Project is accessed via the Sibola Forest Service Road off the Morice Forest Service Road (FSR) that currently connects the Huckleberry Mine complex to Trans-Canada Highway 16. The Morice FSR currently serves as access for industrial use in the region, including forestry, the Huckleberry Mine site and portions of the Coastal GasLink Pipeline. A 17 km mine access road, which is being constructed to support advanced exploration, will provide mine site access from the Sibola Forest Service Road.

There are several other junior exploration companies that are active in the area specifically accessed by the Morice FSR. These include Equity Metals' Silver Queen deposit, Vizsla Copper's Poplar Deposit directly to the northeast of the Berg Copper Project, and Sun Summit Metals' Buck Project further to the northeast of Poplar.

Surge holds a 100% interest in the Berg property, which forms part of a larger porphyry district land package that includes the Berg, Seel, and Ox deposits. The Berg property comprises 113 mineral claims and one mining lease covering 41,894.96 ha, with an additional 6,323.72 ha of contiguous mineral claims under option to acquire, bringing the potential total property area to approximately 48,219 ha (Figure 3.2-1).

FIGURE 3.2-1 BERG PROPERTY MINERAL TENURES



ERM

CLIENT: Surge Copper
GIS NUMBER: BERG-15-014-01

DATE: 27 August 2026

PROJECTION: NAD 1983 UTM Zone 9N
SCALE: 1:525,000 when printed at 8.5x11

In January 2024, Surge completed the acquisition of a 100% ownership interest in the Berg property from Thompson Creek Metals Company Inc. (a subsidiary of Centerra Gold Inc.). In December 2024, Surge entered into an option agreement to acquire the remaining privately held mineral claims (6,323.72 ha) located west of the Berg property. This acquisition secured all mineral tenure required for development of the Berg Copper Project.

Table 3.5-1 (see Section 3.5) summarizes the existing mineral tenures for the Berg property and associated numbers and status. Table 3.2-1 below provides the coordinates of the Berg deposit.

TABLE 3.2-1 PROJECT COORDINATES

Project Component	Coordinates (WGS 84)	Coordinates (UTM Zone 9)
Centre of Berg Property	53º 47’ 53.02” N; 127º 24’ 51.27” W	5,962,220 mN; 604,444 mE
Centre of Berg Deposit	53° 48’ 15.77” N; 127° 25’ 44.76” W	5,962,920 mN; 603,450 mE

Smithers, BC is considered the closest major population centre, approximately 110 km to the north (approximately 200 km by road). Prince George is the closest city centre with a population over 75,000 and is located approximately 400 km to the east.

3.2.1 Project Location and First Nations Communities

The Project is located within the Wet’suwet’en Yintah, in the territory of the Thin House (Yextsowiten) of the Gilseyhu Clan, as well as the asserted traditional territory of CCN.

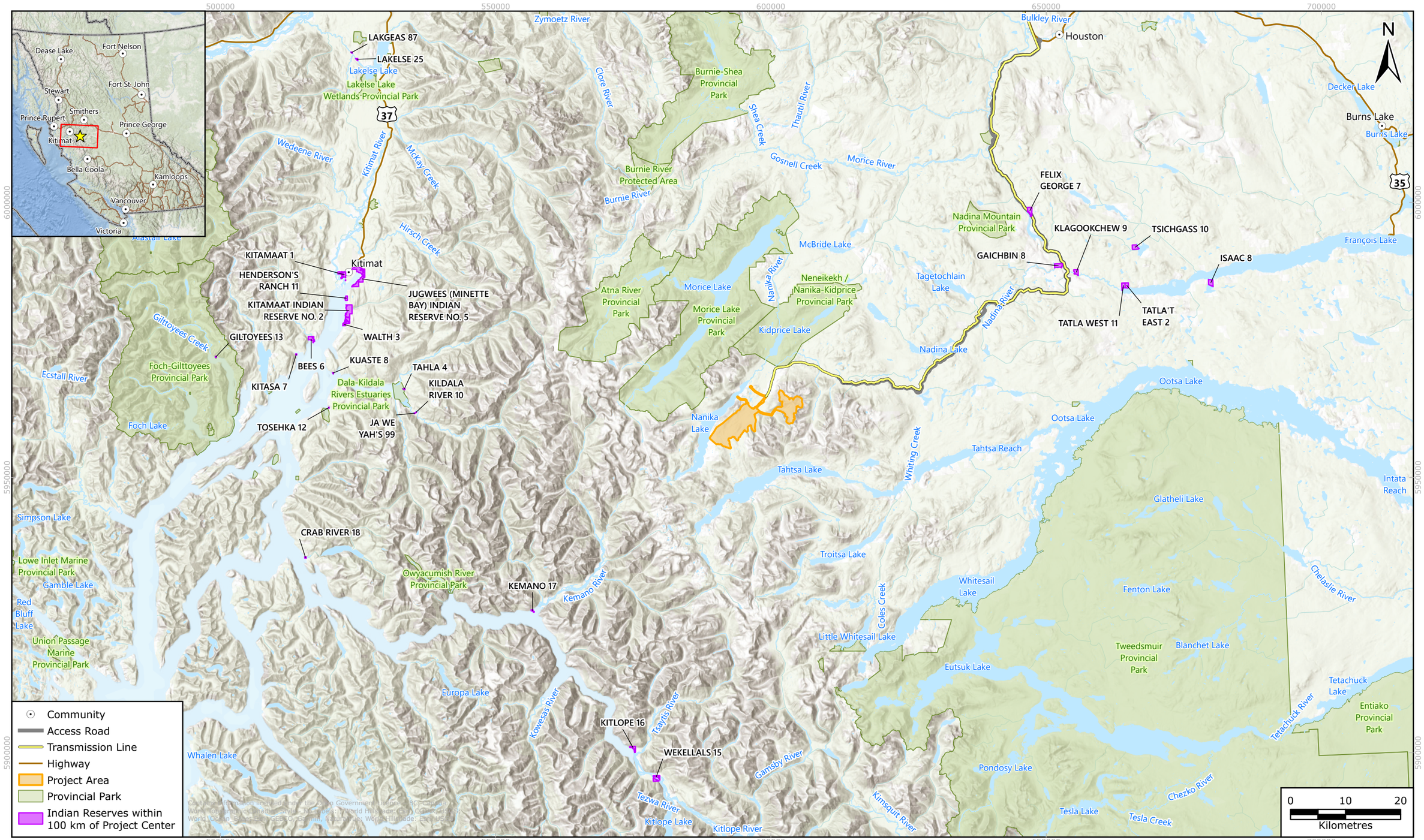
The Wet’suwet’en First Nation (formerly known as Broman or Browman Lake Indian Band) is one of the five Band-governed Wet’suwet’en communities and is located near Burns Lake. The other four Wet’suwet’en communities are Witset (formerly known as Moricetown, west of Smithers), Skin Tyee and Nee Tahi Buhn (both located on the north side of the Nechako Reservoir) and Hagwilget Village is the furthest west along Highway 16.

The closest regularly inhabited First Nations communities or buildings occur just over 50 km away. Table 3.2-2 presents the approximate straight-line distances between the Project and First Nation Reserves located less than 100 km from the Project Area and/or within 50 km of the Transmission Line. Figure 3.2-2 shows the location of the surrounding First Nation communities in relation to the Project Area.

3.2.2 Proximity to Parks and Features

All references to the Project proximity are based on straight-line (point-to-point) distances. Actual travel distances, travel times, and access requirements would be considerably greater.

FIGURE 3.2-2 INDIGENOUS COMMUNITIES IN THE VICINITY OF THE PROJECT



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World_Ocean_Base: Esri, GEBCO, Garmin, Geonames.org, and other contributors
World_Ocean_Base: Esri, GEBCO, Garmin, Geonames.org, and other contributors

ERM

CLIENT: SURGE COPPER
GIS NUMBER: BERG-15-014-10

DATE: 08/27/2026

PROJECTION: NAD 1983 UTM Zone 9N
SCALE: 1:650,000 when printed at 11x17

TABLE 3.2-2 DISTANCES FROM FIRST NATION RESERVES TO THE PROJECT

First Nation Reserve Name	Distance between Reserve and Project Area (km)	Distance between Reserve and Transmission Line (km)	Reserve Area (ha)
Cheslatta Carrier Nation			
Cheslatta 1	>100	43	1070
Haisla Nation			
Bees 6	81	>50	71
Crab River 18	85	>50	7
Giltoyees 13	98	>50	4
Henderson's Ranch 11	77	>50	32
Ja We Yah's 99	61	>50	2
Jugwees (Minette Bay) Indian Reserve No. 5	75	>50	313
Kemano 17	53	>50	11
Kildala River 10	61	>50	1
Kitamaat 1	78	>50	101
Kitamaat Indian Reserve No. 2	75	>50	309
Kitasa 7	83	>50	4
Kitlope 16	63	>50	46
Kuaste 8	76	>50	3
Tahla 4	63	>50	6
Tosehka 12	77	>50	3
Walth 3	76	>50	16
Wekellals 15	67	>50	70
Lax Kw'alaams Band			
Lakelse 25*	97	>50	8
Lakgeas 87	98	>50	5
Metlakatla			
Lakelse 25*	97	>50	8
Nee Tahi Buhn			
Francois Lake 7	>100	45	141
Isaac 8	87	25	84

First Nation Reserve Name	Distance between Reserve and Project Area (km)	Distance between Reserve and Transmission Line (km)	Reserve Area (ha)
Skin Tyee			
Tatla'ʔ East 2	72	10	56
Wet'suwet'en First Nation			
Duncan Lake 2	>100	37	50
Felix George 7	63	<1	94
Foxy Creek 6	>100	37	16
Gaichbin 8	62	<1	90
Jean Baptiste 28	>100	30	128
Klagookchew 9	64	1	63
Maxan Creek 5	>100	37	16
Maxan Lake 3	>100	35	65
Maxan Lake 4	>100	39	66
Tatla West 11	71	10	56
Tsichgass 10	76	12	77

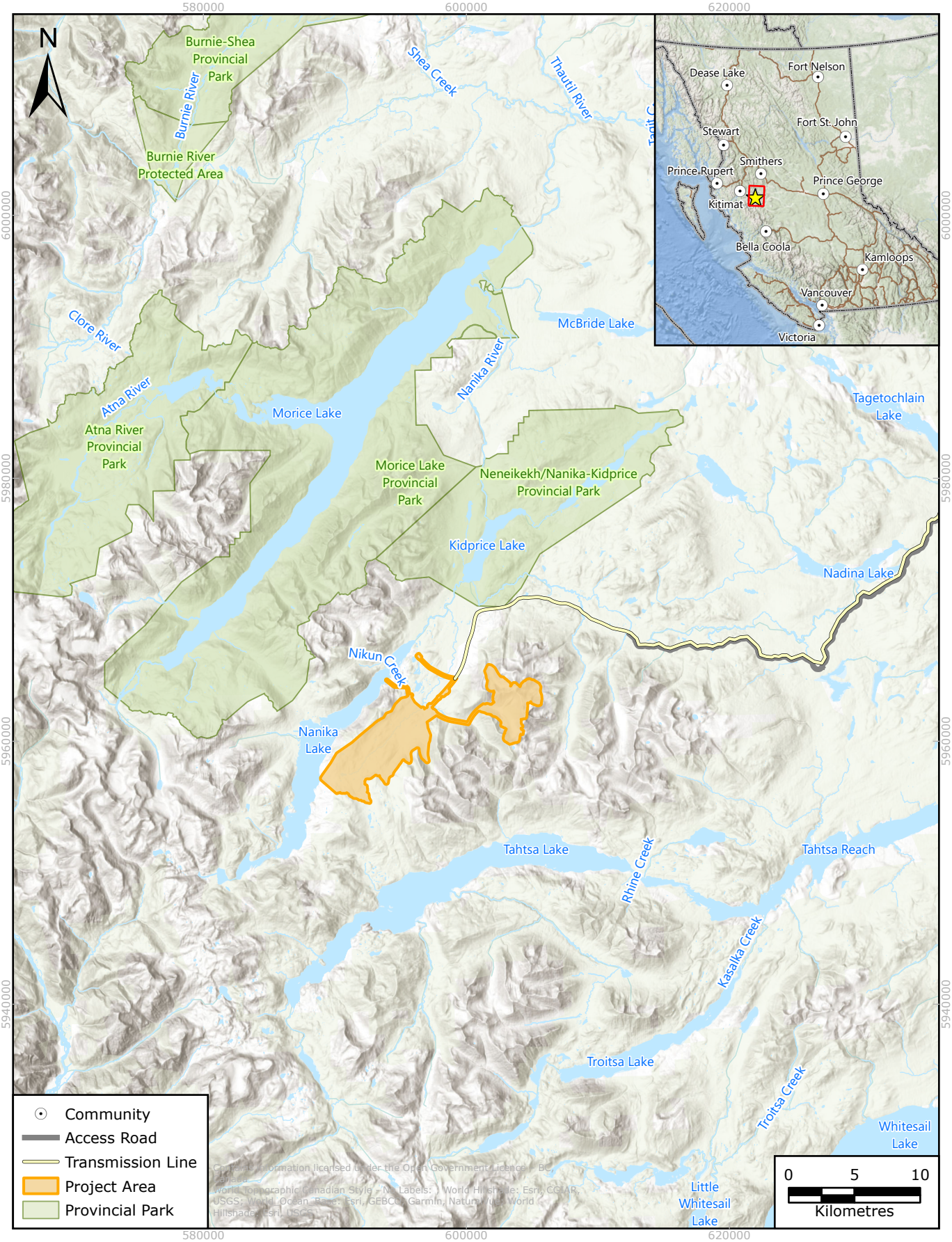
Notes:
Distances and reserve areas are rounded to the nearest whole km/ha.
* The LAKELSE 25 Reserve is associated with more than one First Nation and is listed under each applicable First Nation.

The nearest extent of the Project Area is approximately 5 km from Morice Lake Provincial Park (edge to edge; TWMF Area) and approximately 4 km from Nenikëkh/Nanika-Kidprice Provincial Park (edge to edge; Open Pit Area), measured on a closest point-to-point basis. The transmission line will run adjacent to Nenikëkh/Nanika-Kidprice Provincial Park's far southeastern park boundary, along an existing road.

On the northwest side of the Morice Lake Provincial Park is Atna Provincial Park, approximately 21 km edge to edge from the Project. Figure 3.2-3 shows the location of the Project in relation to parks.

In addition, the recreation sites listed in Table 3.2-3 are located within 20 km of the Project Area. Several registered recreation sites are located within the broader Transmission Line route. As part of the assessment process, Surge will identify and evaluate the location of these sites and consider potential interactions during transmission line routing. Route selection will seek to avoid or minimize effects on recreation sites, access, and recreational use where practicable while balancing technical, environmental, social, and economic considerations.

FIGURE 3.2-3 MAP OF PROJECT AND PARKS AND FEATURES



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Sources:
World Topographic (Canadian Style – No Labels): World Hillshade: Esri, CGIAR, USGS; World Ocean Base: Esri, GEBCO, Garmin, Natural Vue World Hillshades: Esri, USGS

ERM

CLIENT: Surge Copper
GIS NUMBER: BERG-15-014-06

DATE: 27 August 2026

PROJECTION: NAD 1983 UTM Zone 9N
SCALE: 1:400,000 when printed at 8.5x11

TABLE 3.2-3 DISTANCES FROM RECREATION SITES TO THE PROJECT

Recreation Site	Site Location[1]	Distance Between Recreation Site and Project (km)
Nanika Lake Trail	Houston	1
Sibola Rhineridge Cabin	Burns Lake	2
Tahtsa Reach	Houston	13
BLSC Cabin	Burns Lake	14
Sweeney Lake W	Houston	14
Sweeney Lake E	Houston	16
Anzac-Newcombe Trail	Houston	20

Notes:
Distances and reserve areas are rounded to the nearest whole km/ha.
[1] The provincial database was used to inform the "Site Location" column, which identified the closest town/city to the recreation site.

3.3 Project Geology, History, Status and Existing Infrastructure

3.3.1 Project Geology

Geographically, the Project is located in the Tahtsa Ranges, which is a 15- to 20-km-wide belt of mountains within the Hazelton Mountains. The Hazelton Mountains lie along the eastern flank of the Kitimat Range of the Coast Mountains and form part of the Skeena Arch. The Tahtsa Ranges represent a transitional zone between the rugged, predominantly plutonic Coast Mountains to the west and the rolling hill region of sedimentary and volcanic rocks that underlie the Nechako Plateau to the east. The Berg deposit spans a high mountain valley and steep mountain slope south of Mt. Ney. The deposit area sits above Berg Creek, which feeds into Bergeland Creek, which falls within the Morice River watershed that eventually flows to tidewater via the Skeena River near Prince Rupert. The Berg deposit is hosted within a porphyritic Eocene age (50 Ma) quartz monzonite intrusion hosted within Middle Jurassic age andesite volcanic rocks and Late Cretaceous quartz diorite. Higher grade mineralization forms a concentric shell surrounding the Eocene intrusion, with higher grades also occurring near surface within a supergene enrichment blanket.

The Berg Copper Project is situated within a group of 113 unpatented mineral claims and one mining lease covering an area of approximately 41,895 ha, plus 2 optioned claims covering an additional 6324 ha (Figure 3.2-2). Surge's Berg property and main mineral deposits are highlighted in Table 3.5-1.

3.3.2 Project History

The Tahtsa Ranges were first prospected in the early 1900s after gold was discovered near Sibola Mountain. Within the Berg deposit area, drilling by Kennecott during 1965 and 1966 delineated

two main mineralized zones: a northeast zone that contains primary (hypogene) and some supergene mineralization, and a south zone with widespread supergene mineralization.

In 1972, exploration and development of the property were taken over by Canex Placer Limited (Placer Dome Inc.). A total of 119 diamond drill holes for 20,127.9 m had been completed on the Berg property to 1980.

Between 1982 and 2007, there was no active exploration of the Project. In September 2006, Terrane Metals purchased Kennecott's share of the Berg Joint Venture to become a 100% owner.

In 2010, Thompson Creek Metals Company Inc. (TCM) purchased Terrane Metals and continued exploration and drilling. TCM continues as a subsidiary of Centerra Gold, which purchased TCM in 2016.

In December 2020, Surge entered into an Option Agreement with TCM to acquire up to 70% ownership in the property and subsequently purchased a 100% interest in the Berg property. Surge has since conducted various drilling, geophysical, and geochemical surveys on the property, as well as the first-ever NI 43-101 compliant Preliminary Economic Assessment, and Pre-Feasibility Study (PFS; Surge Copper 2026) for the Berg Copper Project.

3.4 Project Status and Existing Infrastructure

The Berg Copper Project is considered a new "greenfield" project and has not been subject to prior EA, either provincially or federally. Existing disturbance at the Project Area is largely due to historic wildfires, timber harvesting and mineral exploration, including associated road-building activities, which are ongoing in the landscape. Existing infrastructure in the Project Area is minimal and limited to that utilized for the exploration program. Temporary or seasonal accommodation facilities (Berg and Sibola), drill pads and trails and monitoring wells, administration trailers, and a core shack have been developed as part of exploration, authorized under permit from the Ministry of Mining and Critical Minerals (MCM) since 2010.

Based on a search of BC's Contaminated Site Registry, there are no known contaminated sites within the Project Area.

Regionally, existing infrastructure includes several FSRs and a power transmission line servicing the Huckelberry Mine. Copper and molybdenum concentrates produced by the Project would be transported to customers outside the region, both domestic and international. The transportation of concentrate from the mine site to distribution locations (e.g. rail load-out, port facilities) to final customers would be undertaken by third parties and would not be under the care and control of Surge. Concentrate is expected to be transported by truck to either existing rail load-out facilities along Highway 16 or existing ports. The final distribution method and customer destinations remain subject to future commercial arrangements.

3.5 Existing Permits and Approvals

The Project currently operates under a Multi-Year Area-Based permit (MX-1-836; originally issued on November 24, 2010) that was amended on July 17, 2026, and expires on March 31, 2030. The amended permit authorizes the use of the existing Berg camp and Camp South (Sibola) camp, geophysical surveying with exposed electrodes, advancement of 110 surface diamond drill holes, 39 helipads, 5.1 km of exploration access construction, 25 km of exploration access modifications, and other conditions and requirements. Exploration activities above 1,200 metres above sea level (masl) in elevation are not authorized between November 1 and July 15 of each calendar year.

In addition, the two following permits were issued for the 2026 aquatic baseline studies for the Project:

- Fish Collection Permit SM26-1063136 valid from June 2026 to December 2027;
- Park Use Permit No. 113235 valid from July 2026 to March 2027;
- General Wildlife Permit for aerial ungulate surveys Permit SM26-1068376 valid from July 13, 2026 to September 30, 2026; and
- General Wildlife Permit for amphibian salvage Permit SM26-1068344 valid from July 15, 2026 to October 31, 2026.

Table 3.5-1 summarizes the existing mineral tenures for the Berg property and associated numbers and status.

TABLE 3.5-1 EXISTING MINERAL TENURES FOR THE BERG PROPERTY AND THEIR ASSOCIATED STATUS

Tenure #	Claim Name	Owner	Title Sub-Type	Issue Date	Good To Date	Area (ha)
243481		201965 (100%)	Lease	8/27/1968	8/27/2027	16.81
515447		201965 (100%)	Claim	6/28/2005	5/30/2035	191.00
515449		201965 (100%)	Claim	6/28/2005	5/30/2035	190.97
515450		201965 (100%)	Claim	6/28/2005	5/30/2035	572.74
515451		201965 (100%)	Claim	6/28/2005	5/30/2035	553.59
515453		201965 (100%)	Claim	6/28/2005	5/30/2035	477.44
515454		201965 (100%)	Claim	6/28/2005	5/30/2035	496.52
515455		201965 (100%)	Claim	6/28/2005	5/30/2035	229.25
515456		201965 (100%)	Claim	6/28/2005	5/30/2035	343.88
545074	SOUTH 1	201965 (100%)	Claim	11/10/2006	5/30/2035	287.10
545075	SOUTH 2	201965 (100%)	Claim	11/10/2006	5/30/2035	363.54

Tenure #	Claim Name	Owner	Title Sub-Type	Issue Date	Good To Date	Area (ha)
545076	SOUTH 3	201965 (100%)	Claim	11/10/2006	5/30/2035	401.64
545077	SOUTH 4	201965 (100%)	Claim	11/10/2006	5/30/2035	401.64
545078	SOUTH 5	201965 (100%)	Claim	11/10/2006	5/30/2035	401.64
545079	SOUTH 6	201965 (100%)	Claim	11/10/2006	5/30/2035	401.76
545080	SOUTH 7	201965 (100%)	Claim	11/10/2006	5/30/2035	344.36
545081	SOUTH 8	201965 (100%)	Claim	11/10/2006	5/30/2035	459.15
545082	SOUTH 9	201965 (100%)	Claim	11/10/2006	5/30/2035	459.28
545083	SOUTH 10	201965 (100%)	Claim	11/10/2006	5/30/2035	325.42
545084	SOUTH 11	201965 (100%)	Claim	11/10/2006	5/30/2035	363.70
545085	SOUTH 12	201965 (100%)	Claim	11/10/2006	5/30/2035	229.65
545086	SOUTH 13	201965 (100%)	Claim	11/10/2006	5/30/2035	306.17
545087	SOUTH 14	201965 (100%)	Claim	11/10/2006	5/30/2035	401.88
594483	BERG C	201965 (100%)	Claim	11/18/2008	5/30/2035	477.79
594485	BERG D	201965 (100%)	Claim	11/18/2008	5/30/2035	478.00
594490	BERG A	201965 (100%)	Claim	11/18/2008	5/30/2035	477.84
594495	BERG I	201965 (100%)	Claim	11/18/2008	5/30/2035	458.03
604970		201965 (100%)	Claim	5/26/2009	5/30/2035	478.14
604976		201965 (100%)	Claim	5/26/2009	5/30/2035	191.32
604978		201965 (100%)	Claim	5/26/2009	5/30/2035	478.24
671443		201965 (100%)	Claim	11/19/2009	5/30/2035	477.37
671444		201965 (100%)	Claim	11/19/2009	5/30/2035	458.14
671450		201965 (100%)	Claim	11/19/2009	5/30/2035	477.06
671451		201965 (100%)	Claim	11/19/2009	5/30/2035	477.06
671463		201965 (100%)	Claim	11/19/2009	5/30/2035	381.64
671467		201965 (100%)	Claim	11/19/2009	5/30/2035	228.93
671472		201965 (100%)	Claim	11/19/2009	5/30/2035	114.56
671473		201965 (100%)	Claim	11/19/2009	5/30/2035	229.13
671484		201965 (100%)	Claim	11/19/2009	5/30/2035	248.32
671503		201965 (100%)	Claim	11/19/2009	5/30/2035	477.58
671523		201965 (100%)	Claim	11/19/2009	5/30/2035	95.53
671526		201965 (100%)	Claim	11/19/2009	5/30/2035	191.01

Tenure #	Claim Name	Owner	Title Sub-Type	Issue Date	Good To Date	Area (ha)
671527		201965 (100%)	Claim	11/19/2009	5/30/2035	381.86
672023		201965 (100%)	Claim	11/20/2009	5/30/2035	305.61
673446		201965 (100%)	Claim	11/24/2009	5/30/2035	381.65
673465		201965 (100%)	Claim	11/24/2009	5/30/2035	190.92
673485		201965 (100%)	Claim	11/24/2009	5/30/2035	95.46
673503		201965 (100%)	Claim	11/24/2009	5/30/2035	343.84
673523		201965 (100%)	Claim	11/24/2009	5/30/2035	95.41
693843		201965 (100%)	Claim	1/4/2010	5/30/2035	457.51
693844		201965 (100%)	Claim	1/4/2010	5/30/2035	476.80
693883		201965 (100%)	Claim	1/4/2010	5/30/2035	457.51
693884		201965 (100%)	Claim	1/4/2010	5/30/2035	457.51
693903		201965 (100%)	Claim	1/4/2010	5/30/2035	457.51
693904		201965 (100%)	Claim	1/4/2010	5/30/2035	438.64
888229	SOUTH 15	201965 (100%)	Claim	9/11/2011	5/30/2035	95.67
896175	Sylvia	201965 (100%)	Claim	9/7/2011	5/30/2035	476.9
896481	BERGW2	201965 (100%)	Claim	9/11/2011	5/30/2035	477.91
896487	BERGW8	201965 (100%)	Claim	9/11/2011	5/30/2035	477.91
896488	BERG W11	201965 (100%)	Claim	9/11/2011	5/30/2035	477.68
896489	BERGW10	201965 (100%)	Claim	9/11/2011	5/30/2035	478.15
896491	BERGW6	201965 (100%)	Claim	9/11/2011	5/30/2035	478.14
896492	BERG W15	201965 (100%)	Claim	9/11/2011	5/30/2035	458.40
896493		201965 (100%)	Claim	9/11/2011	5/30/2035	477.91
896494	BERG W15	201965 (100%)	Claim	9/11/2011	5/30/2035	458.59
896495	BERG W17	201965 (100%)	Claim	9/11/2011	5/30/2035	458.74
898001	BERG EXT 1	201965 (100%)	Claim	9/19/2011	5/30/2035	477.95
898002	BERG EXT 2	201965 (100%)	Claim	9/19/2011	5/30/2035	458.63
898003	BERG EXT 3	201965 (100%)	Claim	9/19/2011	5/30/2035	477.95
898009	BERG EXT 4	201965 (100%)	Claim	9/19/2011	5/30/2035	458.66
898010	BERG EXT 5	201965 (100%)	Claim	9/19/2011	5/30/2035	477.78
898011	BERG EXT 6	201965 (100%)	Claim	9/19/2011	5/30/2035	477.77
905571	BERG N1	201965 (100%)	Claim	10/6/2011	5/30/2035	457.83

Tenure #	Claim Name	Owner	Title Sub-Type	Issue Date	Good To Date	Area (ha)
905578	BERG N6	201965 (100%)	Claim	10/6/2011	5/30/2035	476.81
905581	BERG N7	201965 (100%)	Claim	10/6/2011	5/30/2035	476.58
910289	BERG W21	201965 (100%)	Claim	10/12/2011	5/30/2035	95.41
926662	BERG NW1	201965 (100%)	Claim	10/31/2011	5/30/2035	458.22
926664	BERG NW2	201965 (100%)	Claim	10/31/2011	5/30/2035	477.13
926666	BERG NW4	201965 (100%)	Claim	10/31/2011	5/30/2035	476.88
926667	BERG NW7	201965 (100%)	Claim	10/31/2011	5/30/2035	458.06
926669	BERG NW6	201965 (100%)	Claim	10/31/2011	5/30/2035	286.02
926671	BERG NW8	201965 (100%)	Claim	10/31/2011	5/30/2035	476.93
926673	BERG NW10	201965 (100%)	Claim	10/31/2011	5/30/2035	457.67
930909	BERG NE1	201965 (100%)	Claim	11/24/2011	5/30/2035	400.48
1000685	BERGETTE 1	201965 (100%)	Claim	6/24/2012	5/30/2035	19.09
1011438	BERG NE2	201965 (100%)	Claim	7/24/2012	5/30/2035	419.70
1014803	BERGETTE 2	201965 (100%)	Claim	11/26/2021	5/30/2035	477.44
1015521	BERG NE3	201965 (100%)	Claim	12/27/2012	5/30/2035	286.14
1015818	BERG N11	201965 (100%)	Claim	1/8/2013	5/30/2035	381.52
1017031	SOUTH 16	201965 (100%)	Claim	2/19/2013	5/30/2035	19.14
1030076	BERG NE4	201965 (100%)	Claim	8/6/2014	5/30/2035	1278.66
1031370	SOUTH 17	201965 (100%)	Claim	10/4/2014	5/30/2035	76.52
1065782	Sylvia	201965 (100%)	Claim	1/15/2019	5/30/2035	95.4
1070454		201965 (100%)	Claim	8/18/2019	5/30/2035	19.08
1071719	BERGETTE	201965 (100%)	Claim	10/29/2021	5/30/2035	76.4
1073028	East Bergette	201965 (100%)	Claim	11/30/2020	5/30/2035	1222.4
1073027	Porphyry Creek	201965 (100%)	Claim	11/30/2020	5/30/2035	345.8
1114773		201965 (100%)	Claim	8/1/2024	5/30/2035	1258.13
1119669		201965 (100%)	Claim	01/30/2025	5/30/2035	19.1
1119671		201965 (100%)	Claim	01/30/2025	5/30/2035	19.1
1119672		201965 (100%)	Claim	01/30/2025	5/30/2035	19.12
1119673		201965 (100%)	Claim	01/30/2025	5/30/2035	19.13
1119674		201965 (100%)	Claim	01/30/2025	5/30/2035	19.13
1119675		201965 (100%)	Claim	01/30/2025	5/30/2035	19.13

Tenure #	Claim Name	Owner	Title Sub-Type	Issue Date	Good To Date	Area (ha)
1119676		201965 (100%)	Claim	01/30/2025	5/30/2035	19.11
1119677		201965 (100%)	Claim	01/30/2025	5/30/2035	19.14
1119678		201965 (100%)	Claim	01/30/2025	5/30/2035	19.14
1119679		201965 (100%)	Claim	01/30/2025	5/30/2035	19.15
1119690		201965 (100%)	Claim	01/30/2025	5/30/2035	38.12
1119691		201965 (100%)	Claim	01/30/2025	5/30/2035	19.06
1119692		201965 (100%)	Claim	01/30/2025	5/30/2035	19.07
1119694		201965 (100%)	Claim	01/30/2025	5/30/2035	38.13
1119703		201965 (100%)	Claim	01/30/2025	5/30/2035	1677.71
1119704		201965 (100%)	Claim	01/30/2025	5/30/2035	1638.37
1116926		139085	Claim	1/10/2024	5/30/2035	2314.00
1116936		139085	Claim	10/22/2024	5/30/2035	4009.72

4. Project Description

4.1 Summary of Project Components

This section describes the proposed mining, processing, and tailings storage approach for the Project, based on the 2026 Berg Copper Project PFS. The PFS provides the current basis for the Project design and operating concepts, which will be further refined through ongoing engineering and technical studies, as well as through engagement with First Nations, local governments, regulatory agencies, and other participants during the EA process.

The following key components will form part of the Project.

Mine and Mine Ancillary Facilities:

- Open pit
- Non-potentially acid generating Waste Rock Dumps (NPAG)
- Non-contact water diversion ditches
- Mine Services Building(s), including a truck shop and associated warehouse, as well as a site office
- Low-grade stockpile
- Explosives Plant/Magazine
- On-site mine haul roads and access roads for plant and site facilities
- Diesel fuel storage tanks and fuel station

Process and Process Ancillary Facilities:

- Primary Crusher for each of ore and waste
- Conveyor loadout infrastructure
- Infrastructure for tailings
- Conveyor routing—Mine to Mill
- Secondary Crusher
- Processing facility, including infrastructure for milling and processing 120,000 tpd of ore housed in enclosed buildings and other maintenance and operations facilities
- Stockpile
- Pond
- Water management systems
- Warehouse and cold storage

Mine Waste and Water Management Facilities:

- TWMF
- Tailings distribution pumps and pipelines
- Tailings Primary Cyclone Building
- Conveyor routing—Mine to TWMF via the plant site area, with a total distance of 7.3 km, including a 1.7 km conveyor leg for transport of potentially acid-generating (PAG) waste rock to the tailings and waste management facility
- Return water pipelines for transport between Mill and TWMF

General Ancillary Facilities:

- Utilities, including power supply infrastructure and substation
- Administration services building(s)
- Personnel accommodation facility and its associated buildings and facilities
- Water/Sewage Treatment Plant
- Freshwater distribution, potable water treatment plant, and fire water distribution
- Helipad for emergency response
- Medical and emergency response facilities
- Access point, internal access roads, and Security gate
- Core logging area

Offsite Infrastructure:

- Transmission line

Temporary Facilities:

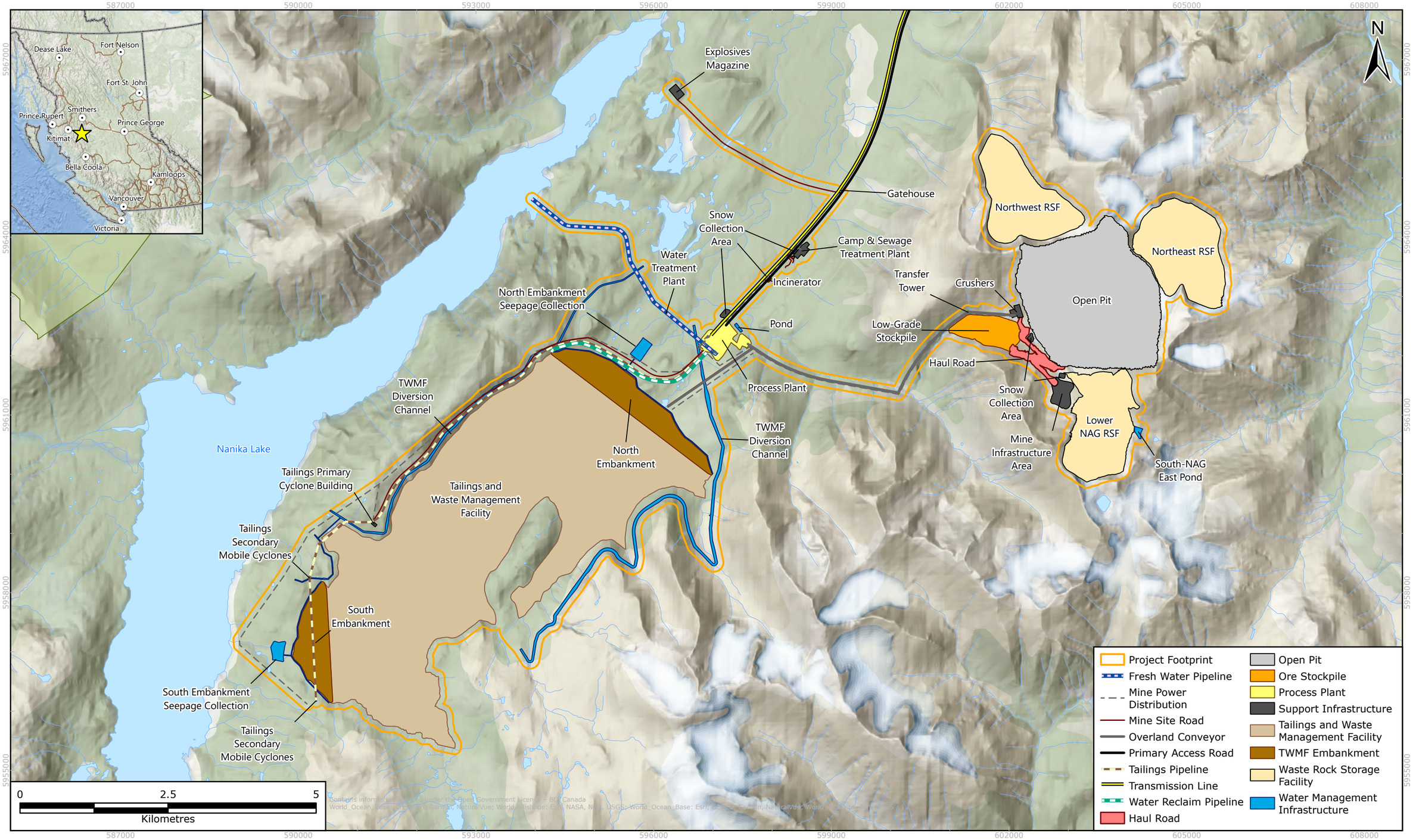
- Various temporary facilities to support construction, including construction laydown areas

Surge will make use of existing infrastructure, including forest service roads and an access road to the Project Area, which would begin near the current terminus of the Sibola FSR and extend westward around the northern and western flanks of Mount Ney and is being constructed to support advanced exploration. This road is considered offsite infrastructure; additional details are provided in Section 4.1.7.

Existing access roads (FSRs) to access the mine site are excluded from this IPD because they are not, and will not be, owned or operated by Surge and under their care and control.

The Project Area represents 5,009 ha. Figure 4.1-1 presents the proposed layout of mining, processing and storage facilities at the Project.

FIGURE 4.1-1 PROPOSED LAYOUT OF MINING, PROCESSING, AND STORAGE FACILITIES AT THE BERG COPPER PROJECT



ERM

CLIENT: SURGE COPPER
GIS NUMBER: BERG-15-016-01

DATE: 09/10/2026

PROJECTION: NAD 1983 UTM Zone 9N
SCALE: 1:60,000 when printed at 11x17

4.1.1 Open Pit

The Berg mineralized zone is a porphyry style copper and molybdenum deposit that contains widespread and disseminated minerals in relatively lower grade that daylights directly at the surface. As such, open pit style mining is the only option for extraction, as underground mining would not be economically effective. A series of pit optimization analyses were run to aid in the definition of the overall final pit shape that is contained within a single open pit shape as opposed to multiple pits. Engineering work was completed to separate and schedule the final pit into a series of smaller phases to facilitate a consistent feed of ore to the processing facility.

When ore is mined from the pit, it will either be delivered to the crusher, the run-of-mine (ROM) stockpile located next to the crusher, or the low-grade ore stockpile (LGO SP). The crusher and ROM stockpiles are located <500 m west of the final pit limits. Following the primary feed into the crusher, all ore will be conveyed to the mill.

Over the course of a 28 year mine production life, approximately 1,209 million tonnes of ore rock will be mined and sent to the processing facility at a rate of approximately 120,000 tpd (an average nameplate mill feed of approximately 43.2 million tonnes per year, with a peak of 48.0 million tonnes per year while processing softer supergene ore). In addition to ore rock, the Project requires the movement of 2,408 million tonnes of non-economic waste rock, based on a life-of-mine strip ratio of 2.0:1, which includes 304 million tonnes of capitalized waste pre-stripping. The total operational period of the open pit mine (including pre-production) is 31 years. Further geochemistry studies are ongoing to assess the proportions of waste rock that would be considered PAG and NPAG; however, 1,053 million tonnes of NPAG and 1,355 million tonnes of PAG over the life-of-mine are anticipated.

The mining fleet is expected to use electric power where equipment is currently available. It is assumed that as the Project progresses, and additional battery and electric options become available, the Project will make use of these options where economic viability exists. Open pit mining is planned on 15-m benches using an owner-operated fleet, consisting of electric and diesel rotary drills, electric cable shovels, diesel hydraulic shovels, and diesel-powered ultra-class haul trucks. While the base case mine plan assumes conventional haul truck technology, the Project may benefit from future adoption of electrified in-pit material transport, as such technologies continue to mature.

The open pit has been designed and sequenced into six phases, or pushbacks, to prioritize higher-value portions of the deposit earlier in the mine life, while maintaining practical pit access and operational flexibility. Peak total material movement, including waste, is estimated at approximately 200 million tonnes per year. Lower-grade material is stockpiled adjacent to the pit during production periods for processing later in the mine life. Additionally, approximately 202 million tonnes of Inferred Mineral Resources within the reserve pit design are treated as waste in the current mine plan, presenting potential opportunities for future Project optimization and PAG waste reductions

subject to further conversion drilling and technical study. Figures 4.1-2 and 4.1-3 show a plan view and an isometric view of the proposed open pit area.

In-pit dewatering systems will be established. Surface water and precipitation in the pits will be gravity drained or directed via submersible pumps to external pit settling ponds outside the pit limits. The mine dewatering system will divert non-contact water and remove contact run-off from precipitation events, groundwater inflows, and design storm events. Water collected within the Open Pit will be transferred to the settling ponds.

4.1.2 Processing and Ancillary Facilities

As part of the 2023 PEA study, two separate options were considered for the location of the processing facility: directly adjacent to the mine area or below the mine in a lower elevation location with proximity to the TWMF. It was determined that the lower elevation level would pose less risk overall to the long-term operations, while having minimal effect on operational costs or logistics and represented a trade-off benefit of reduced tailings piping distance needed for transport to the TWMF. This location was selected to proceed forward for use in the PFS.

The processing facility is envisioned as a standard flotation circuit, like many other facilities in BC, Canada, and around the world, and would incorporate Semi-Autogenous Grinding and Ball mills as well as flotation circuits for copper and molybdenum recovery.

No alternative methodologies for metallurgical processing have been advanced past the evaluation stage, as the mineralized material and environmental conditions do not lend itself to alternative processing methods such as heap leach or circuit leach technologies.

The processing plant nameplate capacity is 120,000 t/d (43.8 Mt/a), that will process ore material over a 28-year period of production. The PFS metallurgical test-work confirmed that the process design is based on a conventional flotation circuit comprising primary grinding, rougher and cleaner flotation stages, and copper-molybdenum separation, with minimal regrind requirements and no dependence on specialty reagents. Waste streams from the processing would be considered tailings and would be transported to the TWMF as described in Section 4.1.3, Tailings and Waste Management Facility.

Over the life of the mine the Mill is expected to produce significant amounts of both copper and molybdenum as the primary minerals for sale. Average annual copper and molybdenum production is estimated at 176 million lbs and 21 million lbs respectively. It is also expected that an average of 3 Moz of silver and 16 koz gold will be recovered annually into a copper concentrate (89 Moz and 439 koz, respectively, over the life-of-mine). Concentrates will be trucked from the Mine site along a new access road to existing FSRs and then to the Trans Canada highway 16. Details specific to the shipping will be addressed as the assessment proceeds and solidified in the final construction phase based on the final contract sale for the concentrate.

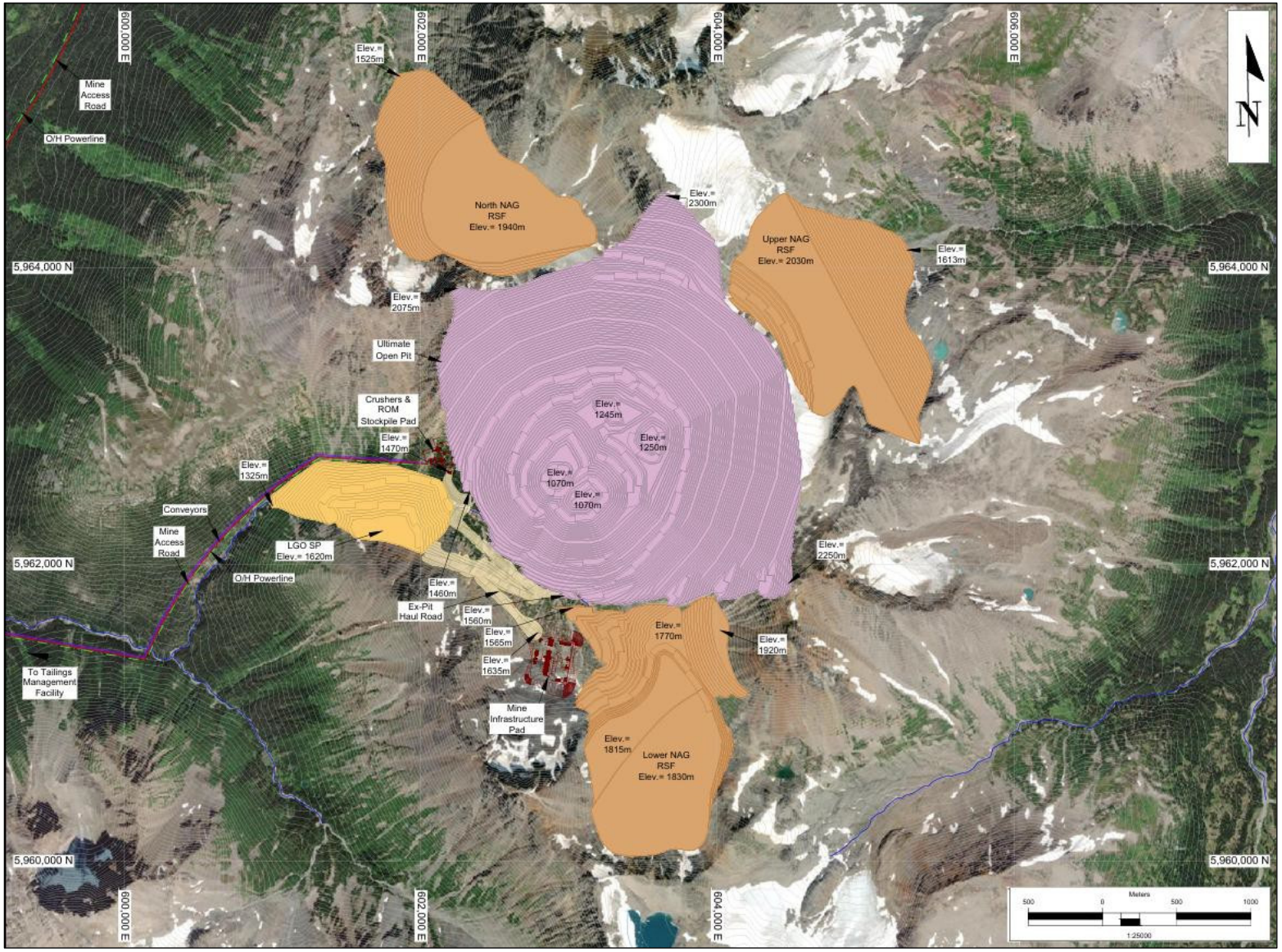


FIGURE 4.1-2 PLAN VIEW OF PROPOSED OPEN PIT AREA AT END OF MINE LIFE

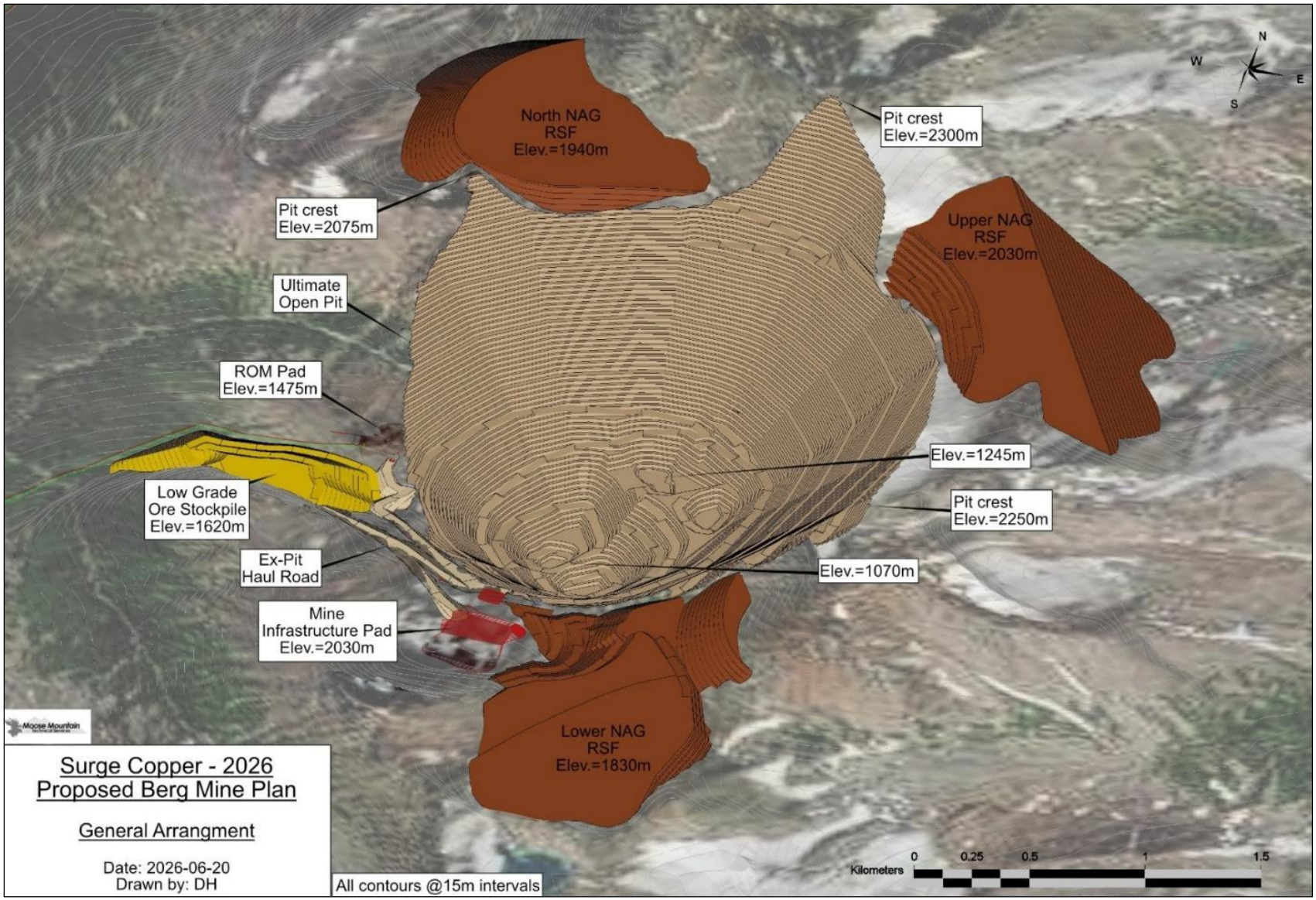


FIGURE 4.1-3 ISOMETRIC VIEW OF PROPOSED OPEN PIT AREA

Figure 4.1-4 present the schematic of processing flow sheets considered for the Project.

4.1.2.1 Conveyors

It is anticipated that there will be two separate conveyors for both ore and waste rock materials, each with a specific primary crusher and loadout located adjacent to each other within the same footprint.

The blasted rock material from the pit that falls under the categories of ore and PAG waste will be diverted to two main destinations, depending on the grade and material type. Transportation of this rock will be via overland conveyor, being loaded at a primary crusher adjacent to the open pit area, extending approximately 5.6 km to the mill location. The selected site layout positions the process plant approximately 400 m below the open pit and primary crusher, taking advantage of natural topography to reduce overall energy intensity and support efficient materials handling. The conveyors will follow a downhill route along the valley from the open pit mine to the processing plant.
The conveyors will rely on electric power, and future studies will aim to incorporate power generation using the downhill potential energy of the rock mass if economically feasible.

An additional 1.7 km conveyor leg will transport waste rock from the processing plant to the TWMF. In the early years of Mine operation, a portion of the NPAG material will be crushed and conveyed to the TWMF for dam construction. The PAG will be crushed and conveyed to the TWMF (Section 4.1.3), whereas the ore will be conveyed to the secondary crusher to allow for additional rock sizing in advance of the metallurgical processing and removal of copper, molybdenum, silver, and gold.

4.1.3 Tailings and Waste Management Facility

The proposed TWMF was designed based on a series of trade-off studies that investigated several siting locations and storage capacity factors. The TWMF was designed as a co-disposal site for slurry tailings from the process plant and PAG waste rock from the open pit. Local topography helps to support embankment design and overall footprint efficiency. The selected facility area also provides meaningful future expansion potential. Factors included in the trade-off conclusions include:

- Environmental footprint;
- Overall volume and capacity;
- Life-of-Mine dam geometry and fill material requirements;
- Location and proximity to mine and infrastructure with focus on reducing footprint;
- Natural topography and containment;
- Water management or diversions;
- Limiting watershed disturbances to a single catchment; and
- Amenability for co-storage with mine waste rock.

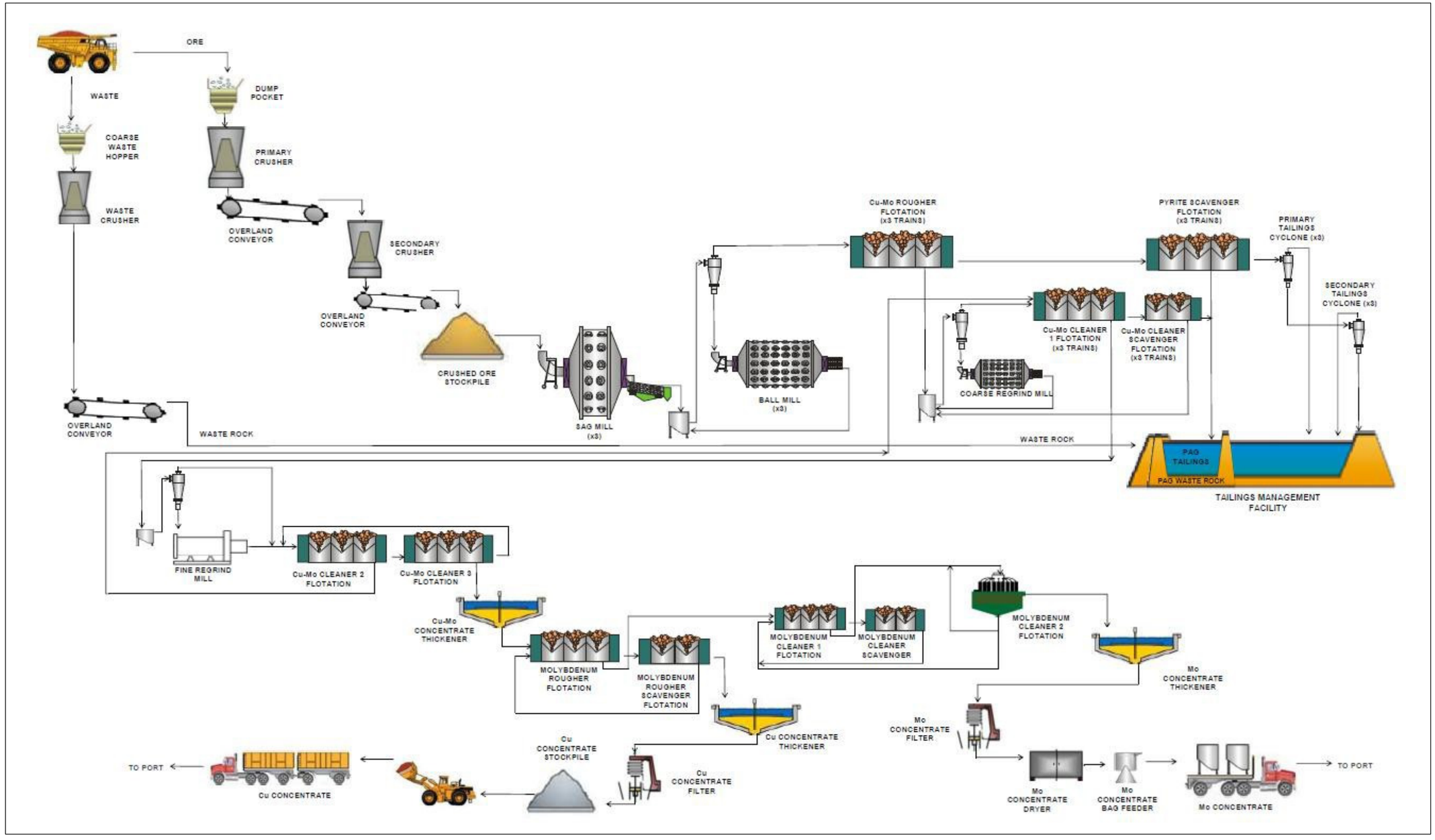


FIGURE 4.1-4 SCHEMATIC OF PROCESSING FLOW SHEET

Further evaluations of tailings siting and mine waste rock storage are underway through a Multiple Accounts Analysis in discussion with First Nations. A Best Available Technology report for alternatives will be made available to regulators early in the assessment review process.

4.1.3.1 Site Selection

For safe management of mine waste and water, Surge is committed to following the Global Industry Standard on Tailings Management.

Table 4.1-1 summarizes the first three topic areas of this standard and the associated status of implementation for the Project.

TABLE 4.1-1 TOPIC AREAS AND ASSOCIATED STATUS

Relevant Global Industry Standard on Tailings Management Topic Areas		Status
I	Communities	Engagement with potentially affected Wet'suwet'en communities within the Wet'suwet'en Yintah and Cheslatta Carrier Nation has occurred throughout exploration and development of the Project. Surge is committed to collaborative, transparent decision-making processes with First Nation communities that will inform and support a sustainable and thoughtful mine design. Engagement activities underway include: • House Scoping Session, led by the OW across Thin House members to surface key assessment criteria and interests on May 20, 2026; • House Scoping Session, led by the OW for Thin House members on discussing the TWMF and alternatives; soliciting input and considerations for the facility planned for September 11, 2026; • *OW Technical Table Leads:* This table reports up to All Chiefs Hereditary Table—biweekly Surge meetings have been ongoing since January 2026, including review and consideration of design criteria for Multiple Accounts Analysis for tailings; • Direct engagement across discipline field programs with OW, Witset, Wet'suwet'en First Nation (WFN), Skin Tyee, Nee Tahi Buhn, and Cheslatta; • Mine closure visioning workshop—planned; and • Ongoing efforts to engage broadly across First Nations on preferred engagement and collaboration approach to work alongside Surge and inform / be informed of key design considerations and principles; initiated June 2026.
II	Knowledge Base	Baseline data and results from the 2023 PEA have informed the proposed tailings facility placement and initial trade-off analysis. A multiple accounts analysis (alternatives assessment) is underway using data from the 2026 PFS to inform design considerations on landform impacts. Further input from subject matter experts and qualified professionals on water and fisheries concerns which will further inform the TWMF.
III	Design	The TWMF location, as currently proposed, was based on the methodology and principles of sustainability, low impact, and the Guide to the Management of Tailings Facilities (Mining Association of Canada 2021), as well as the Guidelines for the Assessment of Alternatives for Mine Waste Disposal (ECCC 2016), The Mines, Health, Safety and Reclamation Code (2026) and Code Guidance-Tailings Storage Facilities and Dams (2024).

Surge has presented the currently preferred location for tailings management. Surge is in early engagement with respective First Nations and subject matter experts in water disciplines to understand interests and concerns with the proposed location; and to review alternatives analysis. As part of the assessment process and the required multiple accounts analysis, Surge will continue to review the preferred TWMF location and design against other alternatives through ongoing dialogue with potentially affected First Nations. Surge recognizes that concerns have been raised regarding the proximity of the facility to critical downstream habitat, and will continue to work with OW technical staff, and other communities on the criteria, considerations and alternatives for TWMF.

4.1.3.2 Tailings Facility Design

Process tailings and PAG waste rock will be permanently stored in the TWMF, located near the process plant, leveraging natural topography to minimize dam fill material and overall footprint. PAG waste rock will be placed at the northeast end of the facility against the TWMF's northeast embankment, and the slurry tailings will be deposited at the southwest end of the facility, creating beaches towards the centre of the facility and against the southwest end of the PAG waste rock.

The TWMF includes the following embankments: Northeast embankment and Southwest embankment. The northeast embankment will be entirely constructed from NPAG waste rock, while the southwest embankment will be constructed from sand (overburden and tailings underflow, both assumed to be NPAG). In addition, it is assumed that embankment construction using sand is possible for only seven (7) months of the year due to the cold climate. Whole tailings generated during the five (5) cold months of the year will be deposited in the TWMF as slurry.

The primary design objectives for the TWMF are to securely contain tailings and subaqueously deposit PAG waste rock to prevent acid rock drainage (ARD) and to protect regional groundwater and surface water during mine operations and over the long term (post-closure). The design of the TWMF and its associated water management facilities has taken into account the following:

- Staged development of the facility over the life of the Project;
- Flexibility to accommodate operational variability in waste rock and tailings (plant shutdowns, deposit variability, and placement under variable climate conditions); and
- Control, collection, and removal of contract water from the facility during operations for reuse as process water to the maximum practical extent.

Tailings will be transported from the process plant to the TWMF via a pipeline and then discharged into the facility from the top of the southwest cyclone sand embankment and along the western perimeter access near the cyclone station. The PAG waste rock will be transported from the open pit to the TWMF via an estimated five-segments of overland conveyors connected by four transfer stations.

The TWMF design standards reflect the relevant federal and provincial guidelines for constructing mining tailings storage facilities in Canada. These were used to establish a conceptual dam hazard classification and suggested minimum target levels for certain design criteria, such as the inflow design flood (IDF) and earthquake design ground motion. Conservatively, the IDF used for operations and post-closure would be the probable maximum flood for a “very high” dam classification, and the spillway would be designed to pass that flood. Earthquake Design Ground Motion parameters would be determined using estimates from the Natural Resources Canada (NRCan) seismic hazard calculator and professional experience in BC, for an assumed peak ground acceleration of 0.126 g.

Instrumentation and monitoring will be required to assess embankment performance. Vibrating wire piezometers (VWPs) will monitor pore pressure within the TWMF and permanent embankment fill, while slope inclinometers and survey monuments in the permanent embankments will monitor slope movement and deformation to support safe operation over the facility’s lifespan. Future studies now underway will provide further design details, including water and seepage management, water quality predictions, and closure requirements, for the TWMF and surrounding infrastructure.

4.1.3.3 Tailings Distribution

The TWMF was designed to store approximately 1,263 Mt (871 Mm^3) of tailings slurry and 1,304 Mt (652 Mm^3) of PAG waste rock, while maintaining a minimum 3 m water cover over the PAG waste rock in the long term to prevent acid generation. The total volume facilitates the total storage of final mine production schedules as outlined in the Berg PFS.

Water from the TWMF is planned to be recycled back to the process plant for use in flotation, reducing overall water demand and minimizing discharge requirements over the life-of-mine. All the tailings will be pumped overland from the process plant using a dedicated line of large diameter Acrylonitrile Butadiene Styrene piping with standard leak detection, spill protection and monitoring management plans.

The primary design objectives for the TWMF are the secure confinement of process tailings, subaqueous deposition of PAG waste rock to prevent potential ARD, and the protection of regional groundwater and surface water during mine operations and in the long term (post-closure).

4.1.4 Material Management

Additional studies will inform the location, detailed design, geotechnical parameters and operational management plans for each of the selected waste rock streams. These studies will further define how alternatives for on-land or in-pit waste rock storage were considered and facilitate linkages to the total TWMF capacity usage are clear.

4.1.4.1 Waste Rock

Based on the PFS test-work completed in support of the Project, waste rock from the open pit is classified as either NPAG or PAG. Detailed characterization of the NPAG/PAG split, including

tonnages and percentages, has been advanced through the expanded ML/ARD characterization program described in section 4.1.4.2 and will be further refined as additional geochemical studies are completed to support the EA.

NPAG waste rock is planned to be stored in one of three facilities located directly adjacent to the open pit, with certain material also used in the construction of engineered embankments for the TWMF and related site infrastructure.

Waste rock classified as PAG will require long-term storage and containment to prevent drainage and detrimental effects to the environment. PAG waste rock will be sent to a dedicated waste ROM pad for crushing and conveyance to the TWMF for permanent storage. This waste ROM pad will be located directly adjacent to the ore ROM pad.

4.1.4.2 Metal Leaching and Acid Rock Drainage

Surge has substantially advanced geochemical understanding of the deposit through expanded ML/ARD characterization and testing completed as part of the PFS and baseline data collection, including representative sampling of the hypogene, transitional supergene, and supergene zones. This work includes the sampling of various waste rock zones at increasing distances from the centre of the Berg deposit towards areas of lesser sulphur content. These investigations yielded sample results showing both PAG and NPAG rock, with the likelihood of NPAG increasing with increasing distance from centre of the resource area. Initial ARD characterization completed by Associated Mining and Environmental Consultants (AMEC) Earth and Environmental in 2007 was wholly focussed on exploration drill holes that were located within areas of higher sulphide mineralization and as such indicated that a significant proportion of Berg deposit rock samples had net neutralization potential ratio values less than 1, identifying them as PAG. Naturally occurring metal-rich acidic drainage has also been observed within the Project Area.

The recent testwork further refined PAG and NPAG classifications within the open pit. Results from 47 samples confirmed a clear distinction between PAG and NPAG materials, supporting development of a PAG/NPAG delineation boundary. Material within the 50 m altered zone is classified as PAG, while material outside this zone, extending to the pit highwall, is classified as NPAG.

Current geochemical characterization indicates that a portion of waste rock and some tailings streams have the potential to generate ARD, with total sulphur content identified as the primary predictor of ARD risk. PAG material is largely associated with the mineralized zone, while NPAG material is expected to increase as mining progresses away from the orebody. These results form the basis for the waste rock classifications and tonnage estimates used in the current mine plan and TWMF design.

The Project's PAG waste rock management strategy involves crushing and conveying PAG material to the TWMF for subaqueous co-disposal with tailings. Maintaining PAG materials under water is intended to limit oxidation and minimize the potential for ARD generation. Additional ML/ARD

characterization, kinetic testing, and geochemical assessments will continue through the EA process and subsequent Project development stages to further refine waste management and closure strategies.

4.1.5 Water Management Facilities and Stewardship

The PFS for the Project incorporates a high-level plan for water management, including a conceptual water balance. The overall purpose for water management includes deploying conventional water treatment approaches, collecting surface water from disturbed areas, and:

- Facilitate efficient recycling of potential contact water;
- Mitigate surface erosion;
- Manage seasonal runoff to avoid impacts on adjacent watercourses;
- Facilitate mine contact water collection and treatment; and
- Facilitate monitoring of water quality to meet discharge standards before discharge.

The Project water management strategy is designed to collect, contain, and manage contact water generated from disturbed areas while minimizing the volume of water requiring active management. Surface runoff that comes into contact with mining and processing infrastructure will be captured and conveyed through a network of collection channels, ponds, and dams for storage, treatment, and/or reuse in the process plant. Where collection channels around the pit perimeter are constrained by topography, runoff will be directed into the open pit and managed through the pit dewatering system.

Key water management infrastructure includes:

- Contact water collection channels to capture runoff from disturbed areas and convey it to collection ponds or dams using gravity wherever feasible.
- Contact water collection ponds located in topographic low points and designed to store runoff from a 1:100-year, 24-hour storm event with a minimum 0.5 m freeboard. Stored water will be treated and discharged or reused in operations.
- Contact water collection dams in areas where steep terrain limits pond development, utilizing natural valley features to capture and store contact water from a 1:100-year, 24-hour storm event.
- Non-contact water diversion channels upslope of the TWMF, the Open Pit, Overburden Stockpile, and Overburden and Rock Stockpile areas to divert clean run-off around the site (reducing the volume of water requiring collection, treatment, and management) and maintain natural drainage patterns to divert clean runoff around the site.

Figure 4.1-5 presents an overview of the site-wide management strategy.

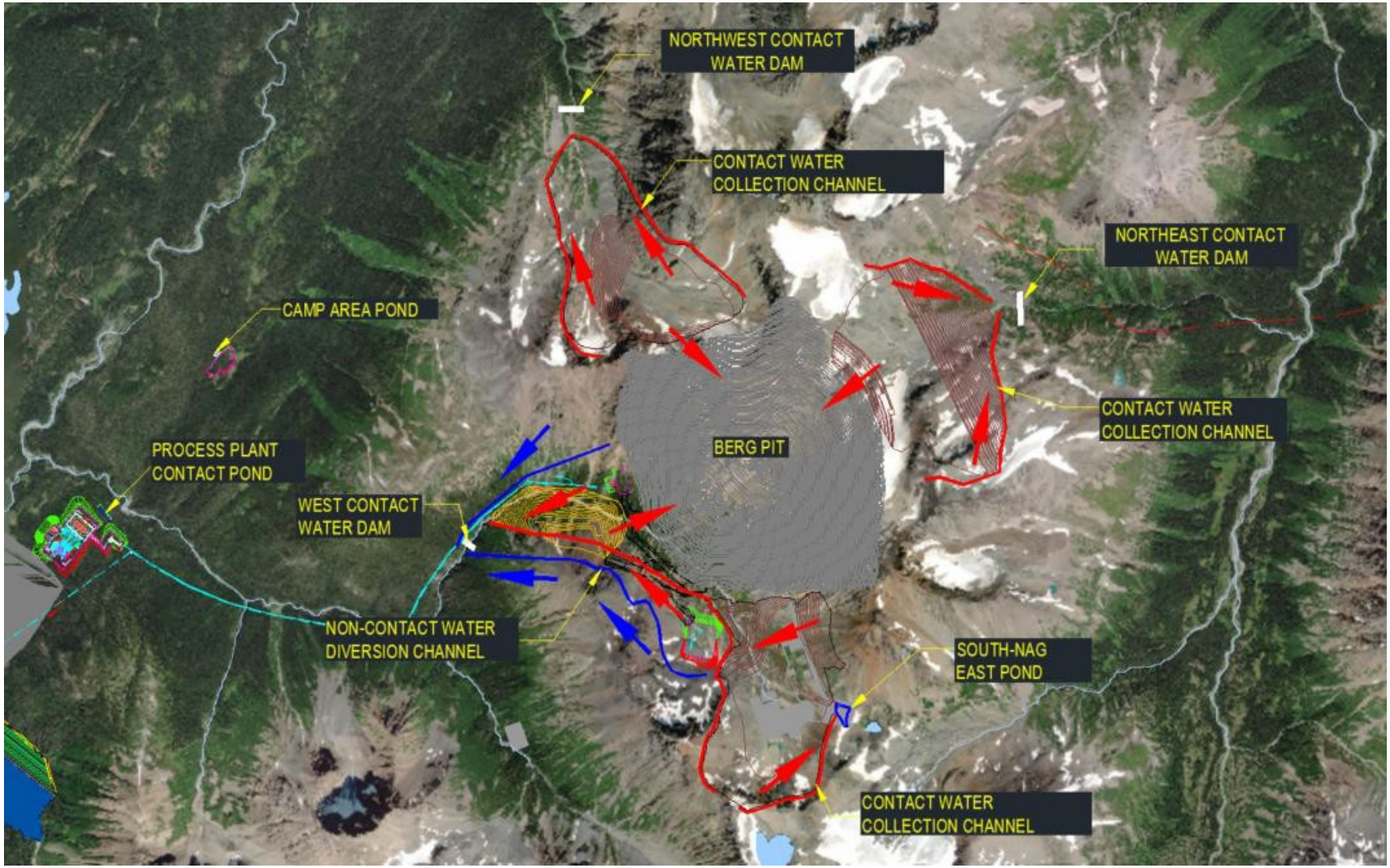


FIGURE 4.1-5 SITE-WIDE MANAGEMENT STRATEGY

4.1.5.1 Water Supply

Freshwater for makeup water is currently assumed to be sourced from Nanika Lake. The water will be transported through pumps. Approximately 4,200 m of overland pipeline will be installed from Nanika Lake to the process plant, where freshwater tanks will be located. Additional studies will be completed to confirm potential alternate sources, including groundwater and subsequently identify a preferred water source.

A preliminary site-wide water balance analysis was performed for the Berg site. In this analysis, a comparison between water requirements, and available water from the collection system was made to identify the site-wide water balance. The following water components were considered in this calculation:

- Surface runoff from precipitation on the Berg pit, process plant, and Accommodation Facility;
- Evaporation from the pond; and
- Process water requirement.

As shown in Table 4.1-2, there is a net annual water surplus of 1,210 m^3/h for average climate scenarios currently anticipated. Future groundwater and pit dewatering values are expected in the EA phase of design and will be added to the water balance equations. As such, the Project will require release of treated water into the natural environment. The location, quality and quantity of this water release will be detailed for inclusion in the EA.

4.1.6 Water Treatment

Active water treatment facilities are expected to be required to ensure water quality will meet standards prior to release. Detailed geochemical characterization is underway for the waste, tailings and ore materials to ensure necessary treatment and storage methodology for mined material is well understood and mitigation measures will be applied. The studies on waste characterization will include neutral metal leaching under subaerial and subaqueous conditions; this analysis will be completed during the EA process.

Should water treatment be required or be proposed in the Environmental Assessment Certificate (EAC) Application, it will meet the appropriate Technology Readiness Level under the Technology Readiness Assessment Interim Guidance (Ministry of Energy, Mines and Low Carbon Innovation 2022). This includes Technology Readiness Level (TRL) 7 for the EAC Application. Should the MA/EMA permits application be submitted concurrently to the EAC Application, additional technical studies, trials and tests will be required to move the TRL rating to an 8/9, which is required for approval. Surge is actively working with subject matter experts to advance a comprehensive, integrated site-wide water balance model and baseline network.

TABLE 4.1-2 SITE-WIDE WATER BALANCE (M^3/HR)—AVERAGE CONDITION

Water Component (m^3/h)	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Average Annual	Annual Volume (m^3)
Process Plant Make-Up Water Demand	1,754	1,754	1,754	1,754	1,754	1,754	1,754	1,754	1,754	1,754	1,754	1,754	1,754	15,365,040
Pits														
Precipitation on Pits and Surrounding Area	1,498	1,189	1,823	816	541	509	488	606	1,323	2,502	2,385	1,730	1,284	11,257,582
Pit Dewatering (BGC; Base Case)	292	292	292	292	292	292	292	292	292	292	292	292	292	2,555,000
Contact Water from Net Precipitation and Evaporation														
Process Plant Area	28	22	33	14	9	9	8	10	23	46	44	32	23	203,435
Camp Area	6	5	7	3	2	2	2	2	5	10	10	7	5	44,462
RSF	900	714	1,093	487	321	302	289	360	790	1,501	1,432	1,039	769	6,742,292
Mine Infrastructure Area and Crusher Area	692	549	841	374	247	232	222	276	607	1,154	1,102	799	591	5,184,478
Deficits/Excess (-/+) Water														
(-/+) in Average Conditions	1,661	1,016	2,335	233	-342	-409	-453	-208	1,286	3,751	3,511	2,144	1,210	10,622,209

4.1.7 Roads

The Project will continue to use the existing main access road via the Morice FSR and Sibola FSR, which are excluded from this IPD because they are pre-existing, well established roadways dating back decades.

An access road to the Project Area is being planned to facilitate advanced exploration and field studies, prior to completion of the EA. This road would begin near the current terminus of the Sibola FSR and extend west and then south around the northern and western flanks of Mount Ney. The total distance would be approximately 17 km. This access road would make use of low elevation ground and directly approach the Process Plant; providing a low-risk route that avoids the upper portions of the Ney River watershed. Studies are ongoing to provide further details on water crossings and geotechnical considerations for construction of this access route. As this road is required to support advanced exploration it would proceed through permitting prior to and separate from the EA.

Generally, the operations components of the Project will be access via a series of internal mine and access roads. These include an access road of approximately 5.5 km following the general route of the overland conveyors for access to the open pit mine and infrastructure. The TWMF will also have a dedicated access road that is currently planned to follow the northern edge of the facility.

4.1.8 Power

For the PFS, it was assumed that power would be supplied from the BC Hydro grid through a new 230 kV transmission line connecting the Project to the BC Hydro grid through a new connection at the Telkwa substation just outside of Houston on Hungry Hill. This transmission line route generally follows the mine access road and existing FSRs and rights of way to Houston, allowing for an integrated corridor design that supports constructability, renewable energy use, and overall site efficiency. Surge is working concurrently with several of the First Nations on a full trade-off study to determine the optimal power supply route for the Berg Copper Project that may consider other uses and connection points as preferred by local First Nations. This study will inform the transmission line routing and the EA scoping. It is expected to be completed before the Detailed Project Description is finalized.

4.2 Project Design or Siting Constraints

A summary of key Project components and their design flexibility is provided in Table 4.2-1. All design components will meet applicable standards, such as the Health, Safety and Reclamation Code for Mines for British Columbia (MCM 2026) and Dam Safety Guidelines (CDA 2013).

The assessment of alternatives is ongoing across these areas. Each assessment will consider relevant factors to identify the preferred alternative. The framework is intended to consider the implications across “accounts,” including financial/economic, environmental, social,

policy/strategic, and reconciliation. Each of these accounts is taken into consideration when reviewing alternatives.

TABLE 4.2-1 KEY PROJECT COMPONENTS AND THEIR DESIGN FLEXIBILITY

Project Component	Flexibility	Rationale
Ore Body	Fixed	Not applicable—the ore body is fixed.
Mining Method Open Pit)	Fixed	Not applicable—underground mining is not suitable due to geological deposit type and geotechnical considerations.
Ore Processing	Fixed	The flotation of minerals is well established technology globally for similar deposits and testwork shows good recoveries of saleable metals. While the deposit may be amenable to heap leach metal extraction, this technology was not considered due to its increased environmental risk.
Transport of Rock from Mine to Processing Facilities	Fixed	The Project has outlined transportation of rock from the mine to mill and TWMF using overland conveyors. As part of technical studies alternatives have included suspended conveyor systems and tunnel access to avoid surface based linear infrastructure. None of the options presented a reasonably feasible alternative to an overland conveyor system. Additionally, the potential alternative of trucking ore and waste from the mine to mill and TWMF was eliminated as an option due to additional environmental constraints on GHG generation and increased land footprint to accommodate sufficient traffic for the scale of material movement.
Transport of Concentrate	Fixed—Project Area to Highway 16	Transportation of concentration from the mine site will be undertaken by third parties and would not be within the care and control of Surge. Transportation of concentrate from the Project Area to Highway 16 is fixed, using the mine access road and existing Morice and Sibola Forest Service Roads. Copper concentrates will be shipped in bulk using standard road going trucks, and it is expected to be shipped overseas for smelting. Concentrate would be transported to a port facility either directly by truck or by rail, from a rail load-out along Highway 16. Molybdenum will be shipped as a bagged concentrate and trucked in standard shipping containers transport by sea or rail to appropriate processing facilities.
Tailings Management	Flexible	Use of existing topography, maintaining proximity to processing facility and open pit to enhance amenability to convey PAG waste for storage, and limiting overall dam fill requirements has indicated a strong preference for TWMF placement as presented in the PFS. Alternate Tailings Facility potential locations for tailings management have been assessed as part of technical studies with an overall focus on the aforementioned factors; confirmation on this site is underway with further assessment under a multiple accounts analysis to factor all components. Alternate Tailings Facility returning land use (closure) design—Options will include alternatives for cover material/design, vegetation, and water management strategy.
Location of Accommodation Facility	Flexible	Alternative considerations for placement or design of accommodation are available. Locations must remain proximal to the Project for operational purposes.

Project Component	Flexibility	Rationale
Power and Transmission Line Routing	Flexible	The base case considers a new 230 kV transmission line connecting the Project to the BC Hydro grid at the Telkwa substation just outside of Houston, generally following the mine access road corridor. Alternative routing options remain under consideration.
Water Source and Management	Flexible	Alternative considerations could include groundwater withdrawals instead of withdrawals from Nanika Lake. While the water source-preference is surface water, options will be reviewed and considered.
Worker Transportation	Flexible	Road transportation from local communities to the Project. Airport transportation and busing to be considered for those outside of local communities. Local airport would be Smithers.
Worker Residency	Flexible	Alternate locations: Personnel will be based onsite and reside in the Accommodation Facility. Provision for residents in communities close to the Project to reside at home will be considered where feasible.
Worker Schedule	Flexible	Local communities have indicated a strong desire for worker schedule that supports local communities with community presence (e.g., coaching, leadership, volunteering obligations). Worker schedules will be considered based on personnel position and operational feasibility.

4.3 Project Phases and Activities

The Project will have four distinct phases, beginning with site preparation and ending with the completion of care and maintenance during post-closure (returning land use). The estimated duration of each key Project phase is described in Table 4.3-1.

TABLE 4.3-1 PROJECT PHASES AND DURATIONS

Phase	Duration (Years)
Site Preparation and Construction (Inclusive of Pre-Production Mining)	3
Operations	28
Closure	2
Post-Closure	Continue until conditions in permits are met.

Ongoing exploration at the Project may identify additional resources and extend the duration of the Operations phase.

Some activities, particularly those involving work during the site preparation and construction phases of the Project and those involving steep slopes and terrain, will be carried out during the summer months when logistical challenges surrounding snow and access can be minimized. Appropriate seasonal work windows for wildlife and fish will be incorporated into planning the Project construction schedule. No other seasonal timing constraints have been identified.

4.3.1 Site Preparation and Construction Phase

Before mining operations and ore production can commence, Surge will prepare the site for construction and build the key elements of the Project infrastructure. Site preparation involves:

- Establish and implement environmental management and protection, and monitoring plans;
- Establish water management and flood protection infrastructure;
- Construct site roads for planned infrastructure, including to TWMF, open pit, processing plant, and Accommodation Facility;
- Complete timber harvesting, and initiate overburden and topsoil stripping and stockpiling over the TWMF location and mill site;
- Construct support buildings and infrastructure required for the construction phase;
- Construct initial Accommodation Facility;
- General earthworks, site levelling, foundations, and buried services; and
- Develop aggregate source(s) anticipated for potential concrete manufacturing, foundation work, and TWMF dam filter zones.

The site preparation activities will be scheduled to reduce the potential disturbance of wildlife. Surge will initiate construction once the site preparation activities have been completed; however, some of the construction activities detailed below may overlap with the site preparation activities.

Construction activities will include the following:

- Expansion of existing environmental management and protection, and monitoring plan(s) for construction activities;
- Construction of diversion ditches/channels and settling ponds;
- Procurement and transport of materials and equipment;
- Movement of construction materials to identified laydown areas;
- Construction of mine infrastructure;
- Construction of the (initial) TWMF lifts;
- Construction of plant and processing facilities;
- Establishment of site drainage works, including pipelines from freshwater/recycled water sources;
- Construction of associated building and accommodation facilities;
- Preparation of onsite rock and waste handling facilities such as conveyors; and
- Pre-production mining activities, including approximately 304 million tonnes of capitalized waste pre-stripping and 23 million tonnes of capitalized ore pre-stripping.

The construction phase is expected to peak at 1,060 personnel in Year-1, including 460 mining personnel and 600 construction personnel.

4.3.2 Operations Phase

The operations phase will start as soon as ore production is initiated. Mining will be by open pit method, with ore material generally being processed immediately after extraction from the open pit. A small amount of stockpiled material will be milled throughout the mine life including ore material that is planned to be mined in pre-production years and eventually fed into the processing facility over the Life of Mine. The process plant will operate at approximately 120,000 tpd to process a total of approximately 1,209 million tonnes of Proven and Probable Mineral Reserve over 31 years (inclusive of 3 years of pre-production mining).

The TWMF capacity will be increased as required throughout the mine life with subsequent dam raises. Solid and liquid wastes/effluent will be managed to ensure regulatory compliance. Environmental activities that will be carried out during the operations phase are anticipated to include:

- Ongoing management of chemicals and wastes;
- Water management/treatment;
- Biological monitoring;
- Environmental management plans;
- Compliance monitoring and reporting;
- Ongoing environmental studies; and
- Progressive site reclamation, where practical.

Peak operations staffing is projected to reach approximately 783 personnel in Year 5, consisting of 550 mining personnel and 233 processing personnel.

4.3.3 Closure and Reclamation Phase

Under BC's *Mines Act*, to proceed with mining operations, Surge must submit a reclamation plan and security bond. It is estimated that closure costs are approximately $236 million, which forms the basis for future closure planning and security bond estimation as the Project advances through the permitting process.

A key closure objective for the mine will be for effluent to meet applicable water quality objectives without ongoing treatment for ARD. The current Conceptual Closure and Reclamation Plan for the Project includes the following measures:

- Partial backfilling of the open pit, where possible, and flooding of the remaining open pit.
- Once depleted, the low-grade stockpile will be reclaimed.
- The surface infrastructure on the site will be decommissioned and removed from the site upon completion of mining.
- Explosives, explosives magazines, fuel, and storage facilities will be removed from the site.
- Concrete slabs and footings will be broken and placed appropriately to meet Project closure and reclamation objectives.
- Process buildings, accommodation facilities, pipelines, conveyor systems, and equipment will be removed from the site or appropriately landfilled in an approved facility.
- The NPAG waste rock storage facilities will be re-contoured for geotechnical stability where necessary.
- Compacted surfaces, including laydowns, civil pads, and roads, will be de-compacted, re-contoured, capped with a graded earthfill/rockfill cover to facilitate runoff and reduce infiltration, and revegetated.
- The TWMF's embankments will be revegetated to establish an erosion-resistant surface.
- The tailings beach will be capped with soil and revegetated.
- Water treatment will continue until the TWMF water quality meets discharge criteria. Once TWMF water quality meets discharge criteria, active water treatment will be stopped, diversions will be decommissioned, and the TWMF will be allowed to passively discharge naturally via a closure spillway.
- For mine roads, all culverts will be removed and cross-ditches installed for drainage.

Closure planning will include engaging with First Nations and stakeholders to assess post-mining return land use objectives and the necessary investigations required to achieve and monitor those objectives.

4.3.4 Post-Closure Phase

Until such time that all long-term reclamation activities have shown to be successful, Surge will hold the site in care and maintenance. Environmental monitoring and potential effluent quality management will occur during this passive period of reclamation. Once the pit is flooded, an additional period of active reclamation may occur to remove remaining Project infrastructure that was retained to facilitate the maintenance, monitoring, and final closure activities.

Return land use will be a key focus in discussions with First Nations members and leadership.

4.4 Project Workforce

During the site-preparation and construction phase, total mine-operations staffing is expected to peak at 460 personnel in Year-1, consisting of 413 hourly workers and 47 salaried staff for mine operations (including the mine administration and maintenance supervision, mine engineering and geology). Construction activities will require an additional 600 personnel, bringing the total peak workforce to approximately 1,060 people during this phase. Due to the shift rotation, only one-quarter of personnel complement will be on shift at a given time. The Project would operate with two daily shifts of 12 hours each, which would necessitate approximately half of the mine workforce onsite at a given point.

During the operations phase, total mine operations staffing is expected to peak at 783 in Year 5, including 499 hourly workers and 51 salaried staff for mine operations and 220 hourly workers and 13 salaried staff for plant personnel.

Surge will generate detailed workforce estimates for each phase of the Project, categorized by Training, Education, Experience and Responsibilities requirements, for the common job profiles required. These profiles will help assess the capacity of the local workforce to meet the Project's employment needs and prioritize skills training that can be provided or facilitated to prepare the local workforce for the employment opportunities that the Project will provide.

Surge is actively working with local governments, the Ministry of Jobs, Economic Growth and the Ministry of Future Skills & Post Secondary to better understand the labour market analysis and focus of the province on growing a skilled and diversified workforce. Surge is targeting a minimum of 50% of the workforce to be sourced from the local and regional area. This is intended to support local and regional participation in the Project.

Table 4.4-1 provides an example of some of the direct employment profiles.

TABLE 4.4-1 COMMON MINING JOB PROFILES

Position	Fixed Requirements	Potential Requirements
Entry Level Positions		
Haul Truck Driver	Physically fit and mobile Appropriate Class or driver's permit, if required to drive outside of the mine site	Completion of accredited driver's training course through a vocational school or community college Certification for transporting dangerous goods
Heavy Equipment Operator	Physically fit and mobile	Technical training and a valid certificate for specific equipment High school diploma or equivalent Valid driver's licence and good driving record

Position	Fixed Requirements	Potential Requirements
Skilled Trades and Technical Support Careers		
Electrician	Completion of a 4-year apprenticeship program that combines classroom instruction with on-the-job training Journeyperson Trade Certificate in Electrical trade Red Seal certificate in Electrical trade	High school diploma or equivalent
Millwright	Journeyperson Trade Certificate as Industrial Mechanic / Millwright (check the requirements for your province or territory) Knowledge of mining operations and mining equipment	Red Seal certification as Industrial Mechanic / Millwright High school diploma or equivalent
Science and Engineering Careers		
Geologist	Bachelor's degree in geology or earth sciences Eligible for registration as a Geoscientist in Training	Professional Registration (i.e., PGeo) Wilderness survival training
Environmental Biologist	Varies with level of responsibility and role, e.g., from applied science training programs through to bachelor's degree and from 6 to 10 years of experience with impact surveys, field studies of endangered species and/or wetland delineation projects	Master's degree in environmental science, preferably in biological sciences or related fields such as environmental science, natural science, hydrology, ecology or botany Professional Registration (e.g., RPBio or P.Ag)
Mining Engineer	Bachelor's degree in mining engineering Eligible for Registration as an Engineer in Training Specialized software skills	Professional Registration (i.e., P.Eng)

Source: Mining Industry Human Resources Council (2025).

4.4.1 Accommodations

The Project will require an onsite Accommodation Facility to support all phases of construction and operations. The facility will be sized to accommodate the peak construction workforce, with capacity added sequentially as construction activities ramp up over the three-year construction period.

During the life-of-mine, the Accommodation Facility is anticipated to be designed to house approximately 550 personnel. The Accommodation Facility will cover approximately 6.5 ha and will include individual rooms, washrooms, and associated support facilities, including potable water supply and treatment, sewage treatment, recreational areas, first aid and emergency response, kitchen and dining, camp offices, laundry, parking, utilities, power distribution, and storage.

4.5 Emissions, Discharges, and Wastes

The Project is expected to generate air emissions, wastewater discharges, sanitary sewage, domestic waste, and hazardous waste throughout its life cycle. Ongoing engineering and design refinement includes a focus on minimizing emissions and reducing potential environmental effects. This section provides an overview of the anticipated direct Project emissions and discharges to air, land, and water, including estimated greenhouse gas (GHG) emissions.

The following section provides an overview of anticipated emissions, discharges and wastes generated from the Project and is based upon the PFS completed by Ausenco and Moose Mountain for the Project in July 2026.

4.5.1 Greenhouse Gas Emissions

As a reviewable Project under the IAA, the Project is required to assess the impacts of climate change per the Strategic Assessment of Climate Change (SACC; Environment and Climate Change Canada [ECCC] 2020). Following section 3 of the SACC, are required to provide an estimate of the Project's GHG emissions as part of the IPD. The sections below contain an initial quantitative estimate of GHG emissions for the Project based on Project information available as of July 2026. It is expected that as the details of the Project are further refined, the estimate of GHG emissions will also be updated.

4.5.1.1 Quantification of Net Greenhouse Gas Emissions

The Project's GHG emissions will be generated directly during construction and mining activities. Following the SACC, net GHG emissions are quantified as:

Net GHG emissions = direct GHG emissions + acquired energy GHG emissions – avoided domestic GHG emissions – offset measures

Net GHG emissions will be calculated for the Construction, Operations, Closure, and Post-Closure phases of the Project. The current estimate of net GHG emissions includes all phases of the Project except Closure and Post-Closure.

The Project has been designed with a focus on sustainability and emissions reduction during the Operations phase. A proactive approach has been adopted to reduce emissions wherever practicable, including the use of electrified equipment and infrastructure where technically and economically feasible. These considerations have been integrated into Project planning and design to reduce the Project's overall emissions footprint and support environmental performance objectives.

4.5.1.2 Direct Greenhouse Gas Emissions

Direct GHG emissions are generated by Project activities and include emissions from mobile and stationary combustion, emissions from land use change, and emissions from industrial processes.

Surge has calculated estimates of diesel fuel usage for mobile and stationary sources, gasoline usage for light-duty trucks, and amounts of explosives. These estimates are used to calculate the direct GHG emissions for the Project. At this stage of the Project, no data is available on the total area to be cleared, and an estimate of GHG emissions for land use changes is not included.

The global warming potential for GHGs and emission factors for diesel, gasoline, and emulsion were derived from values published by the ECCC (2025). The GHG emission factors for emulsion were obtained from the Greenhouse Gas Emissions Quantification Guide published by the Government of Quebec (MELCCFP 2025).

Total direct GHG emissions from the construction and operations (Closure and Post-Closure are not available) phases are estimated to be 4,941,811 tonnes of carbon dioxide equivalent (tCO_2e).

Fuel Combustion Emissions

Fuel consumption data were converted to emissions with the use of global warming potentials for GHGs published by ECCC (2023). The emission factor for Diesel—Refineries and Others (table A6.1-5 in ECCC 2025) was used to estimate the carbon dioxide (CO_2) emissions arising from the combustion of diesel fuel. GHG emissions from diesel combustion were calculated by multiplying the estimated annual fuel needs by the associated combined emission factor for diesel fuel.

Table 4.5-1 shows the annual fuel consumption and associated GHG emissions.

TABLE 4.5-1 ANNUAL FUEL CONSUMPTION AND GREENHOUSE GAS EMISSIONS

Year	Fuel Used in Mining Equipment (L)	Diesel Fuel Used in Mobile Equipment (L)	Gasoline Fuel Used in Mobile Equipment (L)	Annual GHGs (tCO_2e)
Y-3	45,394,487	980,390	63,689	124,850
Y-2	62,098,304	980,390	63,689	169,767
Y-1	73,642,469	980,390	63,689	200,809
Y1	72,570,993	980,390	63,689	197,928
Y2	65,476,439	980,390	63,689	178,851
Y3	75,339,288	980,390	63,689	205,372
Y4	82,623,183	980,390	63,689	224,959
Y5	83,651,202	980,390	63,689	227,723
Y6	71,081,439	980,390	63,689	193,923
Y7	73,806,027	980,390	63,689	201,249
Y8	69,169,275	980,390	63,689	188,781
Y9	68,382,495	980,390	63,689	186,665
Y10	63,067,984	980,390	63,689	172,374

Year	Fuel Used in Mining Equipment (L)	Diesel Fuel Used in Mobile Equipment (L)	Gasoline Fuel Used in Mobile Equipment (L)	Annual GHGs (tCO_2e)
Y11	72,941,864	980,390	63,689	198,925
Y12	76,695,885	980,390	63,689	209,020
Y13	59,578,102	980,390	63,689	162,990
Y14	40,569,429	980,390	63,689	111,875
Y15	58,462,958	980,390	63,689	159,991
Y16	74,777,886	980,390	63,689	203,863
Y17	75,204,107	980,390	63,689	205,009
Y18	36,968,852	980,390	63,689	102,193
Y19	35,040,231	980,390	63,689	97,007
Y20	33,177,132	980,390	63,689	91,998
Y21	39,506,551	980,390	63,689	109,017
Y22	40,521,788	980,390	63,689	111,747
Y23	29,797,019	980,390	63,689	82,908
Y24	38,485,104	980,390	63,689	106,271
Y25	25,509,579	980,390	63,689	71,379
Y26	38,613,707	980,390	63,689	106,617
Y27	24,428,632	980,390	63,689	68,473
Y28	27,029,394	980,390	63,689	75,466

Notes:
L = litre; tCO_2e = tonnes of carbon dioxide equivalent; Y = year
GHG = greenhouse gas

Blasting Emissions

Blasting activities will use emulsion as an explosive. The estimated emulsion consumption per year is provided in Table 4.5-2.

TABLE 4.5-2 ANNUAL EXPLOSIVE CONSUMPTION AND GREENHOUSE GAS EMISSIONS

Year	Annual Explosive Weight (Tonnes)	Annual GHG Emissions (tCO_2e)
Y-3	16,575	2,818
Y-2	35,402	6,018
Y-1	42,413	7,210
Y1	34,136	5,803
Y2	40,841	6,943

Year	Annual Explosive Weight (Tonnes)	Annual GHG Emissions (tCO_2e)
Y3	40,157	6,827
Y4	47,922	8,147
Y5	64,372	10,943
Y6	57,264	9,735
Y7	55,654	9,461
Y8	54,251	9,223
Y9	56,251	9,563
Y10	52,398	8,908
Y11	37,673	6,404
Y12	51,470	8,750
Y13	44,031	7,485
Y14	27,115	4,610
Y15	46,565	7,916
Y16	51,328	8,726
Y17	51,095	8,686
Y18	33,189	5,642
Y19	31,778	5,402
Y20	23,800	4,046
Y21	29,772	5,061
Y22	27,843	4,733
Y23	16,685	2,836
Y24	21,328	3,626
Y25	10,166	1,728
Y26	18,064	3,071
Y27	8,999	1,530
Y28	11,519	1,958

Notes:
kg = kilogram; tCO_2e = tonnes of carbon dioxide equivalent; Y = year
GHG = greenhouse gas

The Greenhouse Gas Emissions Quantification Guide (MELCCFP 2025) established an emission factor of 0.17 kilograms (kg) of CO_2 per kg of emulsion for CO_2 emissions originating from the use of emulsion in blasting operations. Based on the annual emulsion consumption and emission factor, the annual GHG emissions from emulsion explosives are provided in Table 4.5-2. To reduce emissions, Surge is committed to continuing to evaluate other available technology and blasting practices.

4.5.1.3 Acquired Greenhouse Gas Emissions

Acquired GHG emissions are associated with the generation of electricity, heat, steam, or cooling, which is purchased or acquired from a third-party for the Project. Acquired energy GHG emissions for the Project include emissions associated with the generation of purchased or acquired electricity from BC Hydro. The estimated acquired electricity consumption per year is provided in Table 4.5-3. This electricity load would result in an annual consumption as detailed in Table 4.5-3. It is assumed that the annual electricity consumption will be refined as the Project develops.

BC Hydro's GHG intensity is 22.8 tCO_2e/GWh (Province of BC 2026). Based on this intensity, the annual acquired energy GHG emissions for the Project are provided in Table 4.5-3. Based on the annual amounts, the total acquired energy GHG emissions for the Operations phase of the Project is 896,578 tCO_2e.

TABLE 4.5-3 ACQUIRED ENERGY GREENHOUSE GAS EMISSIONS

Year of Operation	Electricity Consumption (GWh)	Total GHG Emissions (tCO_2e)
Y-3	-	-
Y-2	17	381
Y-1	20	460
Y1	1,042	23,763
Y2	1,534	34,970
Y3	1,534	34,980
Y4	1,538	35,061
Y5	1,416	32,290
Y6	1,415	32,271
Y7	1,415	32,271
Y8	1,415	32,273
Y9	1,415	32,268
Y10	1,414	32,235
Y11	1,413	32,208
Y12	1,411	32,177
Y13	1,406	32,061
Y14	1,407	32,084
Y15	1,411	32,171
Y16	1,411	32,173
Y17	1,411	32,176

Year of Operation	Electricity Consumption (GWh)	Total GHG Emissions (tCO_2e)
Y18	1,400	31,921
Y19	1,398	31,877
Y20	1,397	31,854
Y21	1,393	31,750
Y22	1,391	31,704
Y23	1,386	31,601
Y24	1,385	31,585
Y25	1,386	31,598
Y26	1,386	31,599
Y27	1,386	31,612
Y28	1,369	31,203

Notes:
GWh = gigawatt hour; tCO_2e = tonnes of carbon dioxide equivalent
GHG = greenhouse gas

Land Use Emissions

Changes to land use and vegetation can create carbon sources or carbon sinks. Clearing of vegetation creates carbon sources, and restoration of vegetation causes carbon sinks over time. Due to a lack of information on the expected changes in land use, land use carbon sources and sinks have not been evaluated at this stage of the Project and are not included in the current estimate of net GHG emissions. These estimates will be included in the EAC Application.

4.5.1.4 CO_2 Captured and Stored, Avoided Domestic Greenhouse Gas Emissions, and Offset Credits

At this point in time, Surge has not pursued plans for CO_2 capture and storage, or for offset credits. Surge will be assessing these as the Project advances. The Project is not currently expected to directly contribute to avoided domestic GHG emissions.

4.5.1.5 Net Greenhouse Gas Emissions

Based on the direct GHG emissions for the Operations phase of the Project, the total net GHG emissions summed over all years of the Project are 5,838,389 tCO_2e. The maximum annual net GHG emissions for the Project are in Year 5, at 270,957 tCO_2e. See Table 4.5-4 for a summary of annual net GHG emissions.

TABLE 4.5-4 ANNUAL EXPLOSIVE CONSUMPTION AND GREENHOUSE GAS EMISSIONS

Year	Annual Net GHG Emissions (tCO_2e)
Y-3	127,668
Y-2	176,166
Y-1	208,480
Y1	227,494
Y2	220,764
Y3	247,179
Y4	268,166
Y5	270,957
Y6	235,929
Y7	242,981
Y8	230,277
Y9	228,496
Y10	213,518
Y11	237,538
Y12	249,947
Y13	202,536
Y14	148,569
Y15	200,078
Y16	244,761
Y17	245,871
Y18	139,756
Y19	134,287
Y20	127,898
Y21	145,828
Y22	148,184
Y23	117,345
Y24	141,482
Y25	104,705
Y26	141,286
Y27	101,614
Y28	108,627

4.5.1.6 Net-Zero Plan

According to the SACC (ECCC 2020) a credible net-zero plan is required for projects with a lifetime beyond 2050. Additionally, the Province of BC is (Ministry of Energy and Climate Solutions 2025) implementing the Net-Zero New Industry Policy as part of the *Greenhouse Gas Industrial Reporting and Control Act*. This policy requires new facilities to develop net-zero plans that must be approved by the Climate Action Secretariat before the facility is permitted to proceed. In 2050 and each year thereafter, facilities will be required to achieve net-zero emissions. The Minister of Environment and Climate Change Strategy established a legal requirement under Section 19(6) of the EAA that all projects "must, during the Environmental Assessment process, provide a credible plan for their Project to achieve net-zero greenhouse gas emissions by 2030, in the case of liquified natural gas facilities, or 2050 in the case of all other Projects" (Environment and Climate Change Strategy [ENV] 2024, 1).

The Project's Operations phase is expected to extend beyond 2050, and therefore GHG emissions beyond this time frame are expected to remain high until Closure and Post-Closure. Therefore, it is expected that a net-zero plan will be required during the Operations and Closure and Post-Closure phase. As the calculation of net GHG emissions is updated through the continued refinement of the Project, including refining emissions during the Operations and Closure and Post-Closure phase of the Project, a net-zero plan will be implemented to satisfy all requirements of the SACC.

4.5.1.7 Conclusions

The Project is subject to an assessment of the impacts of climate change. Based on guidance provided in the SACC, the Project must provide an estimate of net GHG emissions during the construction and operations phases.

Under the *Climate Change Accountability Act* (2007), BC has committed to reduce total provincial GHG emissions to 40% below 2007 levels by 2030 (38,800,000 tCO_2e/year) and 60% below 2007 levels by 2040 (25,900,000 tCO_2e/year). Net emissions from the Project at peak emissions are estimated to be 270,957 tCO_2e, which represents 0.70% of the *Climate Change Accountability Act* (2007) 2030 target.

Under the *Paris Agreement* (United Nations 2015), Canada committed to reducing its GHG emissions by 30% below 2005 levels by 2030. In 2019, the 2005 level was estimated at 730 megatonnes of carbon dioxide equivalent ($MtCO_2e$); therefore, Canada's 2030 target is 511 $MtCO_2e$. Net emissions from the Project at peak annual emissions are estimated to be 270,957 tCO_2e, which represents 0.05% of the Canadian 2030 target.

The predicted emissions of GHGs over the life of the Project will have a negligible effect on the ability for BC and Canada to meet their GHG emissions targets.

4.5.2 Air Emissions

In addition to GHG emissions, the Project will generate criteria air contaminants (CACs) and other air emissions from the following sources:

- **Fugitive Dust:** Open pit blasting and loading operations, ore and waste rock haul roads, conveyance, crusher feed and transfer points, waste rock stockpiles, tailings beach during active deposition, and construction earthworks.
- **Blasting Emissions:** Nitrogen oxides (NOx), carbon monoxide (CO), and particulate matter (TSP, PM_{10}, and $PM_{2.5}$) from detonation of bulk emulsion explosives in production blast holes.
- **Diesel Combustion (Mobile Fleet):** NOx, $PM_{2.5}$, sulphur dioxide (SO_2), CO, and volatile organic compounds (VOCs) from haul trucks, drills, excavators, and auxiliary equipment.
- **Process Plant Emissions:** Minor fugitive emissions from concentrate handling, reagent mixing, and storage are anticipated; two provincial parks and three recreation sites are located within a 60 km radius of the Mine site. Air quality dispersion modelling will be required as part of the EA process to assess whether Project emissions may interact with these sensitive areas and with First Nations cultural land use interests within the Wet'suwet'en Yintah and the asserted traditional territory of CCN.

4.5.3 Noise and Vibration Emissions

The Project will generate noise and vibration from open pit blasting operations, haul truck traffic, ore crushing and conveyor systems, and processing plant equipment. Given the remote setting, primary receptors are anticipated to be wildlife and associated habitat rather than human settlements; however, potential effects on cultural land and resource use will also be considered.

The EA will include a noise and vibration assessment that characterizes baseline ambient conditions, models predicted sound levels against applicable provincial standards and guidance, where applicable, and identifies mitigation measures and monitoring commitments to manage effects throughout Construction, Operations, and Closure.

4.5.4 Water Emissions

Water emissions include the discharge of contact water (i.e., water that has been in contact with potential sources of contamination) and the diversion of non-contact water (i.e., from upstream catchments that have not been in contact with mine workings) to the receiving environment. Water discharge monitoring will be a fundamental component of the Environmental Management System, and water will meet provincial permit limits and relevant federal standards before discharge.

Water management for the Project will include the discharge that has had contact with potential sources of contamination and non-contact water that will be collected and diverted from upstream areas of Project infrastructure. The collection of contact water, as detailed in Section 4.1.6, will

include water diversions around major Project infrastructure, including the TWMF. Contact water will be tested and recycled where possible for use in the processing facility. Water from the TWMF is planned to be recycled back to the process facility for use in flotation to reduce overall water demand and reduce discharge requirements. Water discharge from the processing facility will be directed to the TWMF. Surplus contact water that is not required for the processing facility will be stored and treated before discharge into the natural environment.

The EAC Application will consider water modelling results, return land use objectives post-closure and the role the TWMF plays in integrated waste and water management over the life of the mine, and post-closure.

4.5.4.1 Tailings

The Project is estimated to generate approximately 1,209 million tonnes of milled ore material over the 28-year operating mine life, at a processing rate of 120,000 tpd. Tailings will be pumped as slurry via pipeline from the process plant to the TWMF, located southwest of the process plant on the western side of the site. The TWMF design objective is the protection of regional groundwater and surface water during operations and post-closure.

4.5.4.2 Waste Rock

The mine plan involves the movement of a waste:ore strip ratio of approximately 2.0:1, inclusive of approximately 304 million tonnes of capitalized waste pre-stripping. Based on expanded ML/ARD characterization advanced through the PFS, waste rock is classified as either PAG, which will be crushed at the primary crusher and conveyed via conveyor to the TWMF for subaqueous co-disposal with process tailings, or NPAG, which will be stored in surface waste rock storage facilities adjacent to the open pit and used in construction of engineered embankments for the TWMF and related site infrastructure, and re-contoured where necessary at closure. Further geochemistry studies are ongoing at this time to assess the final proportions of waste rock that would be considered PAG and NPAG; however, 1,053 million tonnes of NPAG and 1,355 million tonnes of PAG over the life-of-mine are anticipated.

4.5.4.3 Domestic and Hazardous Waste

Non-hazardous solid waste generated during construction, operations, and closure will be managed in accordance with applicable regulatory requirements and industry best practices. Recyclable materials will be segregated and transported to an approved transfer or recycling facility. Industrial solid waste will be disposed of at a licensed off-site facility or, where permitted, incinerated onsite in compliance with BC *Environmental Management Act* (EMA) requirements.

Domestic refuse from the 550-personnel onsite Accommodation Facility and industrial solid waste from mining and processing operations will be managed in compliance with the BC EMA Hazardous Waste Regulation and *Mines Act* requirements. Dedicated waste management areas will be

established on-site. Hazardous materials, including diesel fuel, lubricants, reagents, and explosives, will be stored in compliance with applicable BC and federal dangerous goods regulations. Spent reagents and other process chemicals will be disposed of at licensed off-site facilities.

All waste collection, storage, and staging areas will be designed and operated to regulatory standards, including spill prevention and response procedures and fire safety protocols. Waste management commitments will be further detailed in the construction and operations Environmental Management Plans to be developed before Project construction.

4.6 Alternatives to the Project

Surge has considered potential alternatives to the Project that are technically and economically feasible, including: (1) not undertaking the Project; (2) changing the timing of the Project; and (3) changing the location of the Project.

The 'no Project' alternative would not achieve the Project's purpose and would forego the significant economic, social, and strategic benefits associated with its development. These benefits include direct and indirect employment opportunities for local First Nations communities, including Southbank, Witset, and Burns Lake, as well as the communities of Smithers, Houston, Fraser Lake, and the broader Bulkley-Nechako region. The Project will also create business and procurement opportunities for local and Indigenous enterprises and generate substantial municipal and provincial tax revenues throughout the Construction, Operations, and Closure phases.

Beyond the regional economic benefits, the Project will contribute to Canada's supply of critical minerals. Copper and molybdenum are identified as critical minerals under Canada's Critical Minerals Strategy and are essential inputs for EVs, renewable energy infrastructure, electricity transmission, and grid modernization. The Project has been accepted into BC's Critical Minerals Office, which supports coordination and early preparedness for priority critical minerals projects as they advance through the regulatory process. Development of the Project would therefore strengthen the domestic supply of these strategically important minerals and support Canada's broader decarbonization and energy security objectives. As geopolitical uncertainty continues to reshape global supply chains and access to critical mineral resources, the importance of secure, reliable domestic production has become increasingly significant. Accordingly, the 'no Project' alternative would forego these regional, provincial, and national benefits without providing equivalent economic, environmental, or strategic outcomes through alternative means.

The second alternative, changing the timing of the Project, is expected to result in substantially the same environmental and social effects as the proposed development schedule. The delayed Project would reduce the economic benefits due to discounting and the time value of money. The primary consequence would be the deferral of those benefits, including employment, procurement opportunities, government revenues, and contributions to regional economic development, as well as a delay in increasing Canada's domestic supply of critical minerals. Current geopolitical

conditions and increasing global competition for secure supplies of critical minerals have heightened the importance of developing reliable domestic sources of copper and molybdenum. At the same time, global forecasts indicate that demand for copper is expected to outpace supply over the coming decades, increasing the strategic importance of bringing new production online. Accordingly, delaying the Project would defer these benefits without providing a corresponding environmental or technical advantage that has been identified by Surge.

The third alternative, changing the location of the Project, is not considered feasible. The copper molybdenum porphyry deposit is geologically fixed, and the Project has been designed around the location of the mineral resource. In addition, the proposed mine and supporting infrastructure have been sited to optimize the use of existing regional access infrastructure, connect to the BC Hydro transmission network, and take advantage of the site's natural topography, thereby reducing the need for additional infrastructure and associated disturbance where practicable. Surge is not aware of an alternative copper-molybdenum deposit of comparable scale, grade, and proximity to existing infrastructure within British Columbia or elsewhere in Canada that could achieve the same Project objectives.

4.7 Alternative Means of Carrying Out the Project

As outlined in Table 4.7-1, Surge is committed to evaluating and incorporating alternative means of carrying out key Project components where they are technically, environmentally, socially, and economically feasible. The Project components currently under active consideration include tailings management (including return land use and closure strategy), the location of the accommodation facility, power supply and transmission line routing, water sourcing and management, worker transportation, worker residency, and worker scheduling.

TABLE 4.7-1 ALTERNATIVE MEANS OF CARRYING OUT THE PROJECT

Component/Activity	Alternatives Being Considered	Preferred Option
Ore Processing Location	Process ore onsite Ship ore offsite to processing facilities with spare capacity	Processing ore onsite is the only viable option due to the large-scale of required material movement.
Mining Method	Open Pit, Underground	The resource grades and scale do not allow for current economic mining of the Berg deposit using underground methods. Open pit is required.
Concentrate Transport	Road, Rail, Shipping	No current facilities are in place to complete copper concentrate logistics via rail. The preferred option is transport in bulk via truck to a port for shipment overseas for sale and further processing.
Infrastructure	Use of existing infrastructure Build new infrastructure	Use of existing infrastructure, like roads and access, is preferred due to cost and environmental effects of building new infrastructure.

Component/Activity	Alternatives Being Considered	Preferred Option
Power	Onsite diesel generation, renewable power generation, and connection to BC grid	Connection to BC provincial grid is preferred due to the low-carbon supply of electrical power available in BC. Alternatives or supplementary sources of power will be considered as they become available.
Tailings Management	Location and Technology	A currently preferred TWMF has been laid out in this report. Additional options are being assessed within a Multiple Accounts Analysis for both location and best available technology.
Waste Rock Management	Location of NPAG waste rock storage areas	Multiple locations have been proposed for proximity to the open pit to reduce both environmental effects and resulting costs. No additional locations are currently being considered due to logistical challenges to access these locations.
	PAG Waste storage within TWMF	The preferred option is the combined storage of waste rock and tailings in a single TWMF. Due to ongoing risks and concerns for PAG waste rock storage, no additional alternatives are being considered.
Water Management	Water treatment technologies Water discharge location	No preferred alternative has been selected as ongoing studies and design work continue to inform optimization of configurations. It is assumed that water treatment will meet applicable standards or guidelines for release.
Worker Transport and Accommodation	Worker accommodations onsite	The preferred accommodation for many workers will be at on-site facilities. Alternative accommodations and work schedules will be evaluated considering the needs of personnel and the required physical location.

The preferred alternatives identified in this IPD represent Surge's current understanding based on available engineering, environmental, socio-economic, and technical information. As Project planning advances and additional studies, engineering, engagement with First Nations, subject matter experts, regulators, stakeholders, and the public are completed; and through EA activities, these alternatives will continue to be refined. Feedback received throughout the EA and regulatory review process will inform the selection of final Project components and the alternative means presented in the EAC Application.

4.8 Public and Environmental Safety

Section 25(2)(c) of the EAA and Section 22(1)(a)(i) of the IAA require EAs to consider the risks associated with Project malfunctions and accidents. Unplanned events arising from Project-related activities could result in adverse effects on environmental, economic, social, cultural, and health values, as well as impacts on First Nations' rights and interests. The EAC Application will include an assessment of key accident and malfunction scenarios, their potential effects, and mitigation measures designed to reduce both the likelihood and consequences of such events.

Engagement conducted to date has identified general concerns regarding the potential for accidents and the need to protect the environment. Through ongoing engagement, Surge is continuing to seek input from First Nations, local governments, rights holders, stakeholders, and the public to better understand concerns related to Project accidents and malfunctions. This feedback will help inform Project planning and the development of measures to avoid, reduce, or mitigate potential risks and effects.

Potential accident and malfunction scenarios that may be assessed in the EAC Application include:

- Spills affecting land, water, or air, including releases of hazardous materials stored onsite (e.g., reagents, fuels, or oils);
- Releases of contaminants to watercourses;
- Slope failures within the open pit or rock and overburden stockpiles;
- Failure of stockpiles;
- Failure or breach of water management and containment structures;
- Motor vehicle accidents;
- Explosive-related incidents, including fly rock and excessive noise;
- Fires and fire-related explosions; and
- Prolonged power outages.

Prior to construction, Surge will develop emergency response, emergency preparedness, and community response plans in consultation with First Nations and regulators, consistent with the Health, Safety and Reclamation Code for Mines in British Columbia (MCM 2026). Emergency planning will involve potentially affected communities and First Nations in identifying potential hazards, emergency communication protocols, and response procedures. The plans will include contact information for First Nations, provincial agencies, and affected communities to ensure timely notification and coordinated response in the event of an emergency. The planning process may also create opportunities to establish mutual aid agreements and strengthen regional emergency preparedness and response capacity.

5. Regulatory and Policy Framework

Outside of the information listed in this section, Surge is not aware of any relevant government policies that may not be compatible with the Project. Surge is not aware of applicable international agreements between the Province of BC or the Government of Canada and other international governments that may be relevant to the Project.

5.1 British Columbia's *Environmental Assessment Act*

The Project has an estimated mill feed of approximately 43.2 Mt of ore per year. Pursuant to Sections 3(1) and 4(1) of the Reviewable Projects Regulation (2019), the proposed maximum production capacity for the Project exceeds the criteria of 75,000 tonnes of mineral ore per year, potentially includes GHG emission triggers, and will therefore require a provincial EA in accordance with the BC EAA (2018). The specific Reviewable Projects Regulation (2019) trigger is: Part 3 (Mine Projects), Table 6; Row 2 Mineral Mines: (1) A new mine facility that, during operations, will have a production capacity of greater than or equal to 75,000 tonnes of mineral ore per year.

5.2 Canada's *Impact Assessment Act*

The Project is also reviewable under the federal IAA (2019) Physical Activities Regulations (SOR/2019-285) based on the daily ore production capacity of over 5,000 tonnes per day. The specific triggers are:

- **Section 18(c) (Mines and Metal Mills):** "The construction, operation, decommissioning and abandonment of: (c) a new metal mine, other than a rare earth element mine, placer mine or uranium mine, with an ore production capacity of 5,000 t/day or more"; and
- **Section 18(d) (Mines and Metal Mills):** "A new metal mill, other than a uranium mill, with an ore input capacity of 5,000 t/day or more."

5.2.1 Substitution

Pursuant to the Impact Assessment Cooperation Agreement between Canada and British Columbia (Cooperation Agreement'; Government of Canada 2020), Surge anticipates that the EAO will request the federal Minister of ECCC to approve the substitution of the BC EA process for the federal IA process.

The Cooperation Agreement is designed to streamline the federal-provincial assessment process by increasing efficiency, reducing duplication, and drawing on the best available technical and regulatory expertise reflecting the shared principle of "one project, one assessment." Building on this framework, in 2025, the IAAC, Natural Resources Canada, the BC EAO, and the MCM jointly issued a Commitment Statement for the Development of Critical Mineral Projects. The Commitment Statement advances alignment between federal and provincial permitting and authorization

processes to improve coordination and reduce regulatory duplication for critical mineral projects, including copper and molybdenum projects such as the Berg Copper Project. Consistent with this framework, the Project has been accepted into British Columbia's Critical Minerals Office, which is intended to support coordination and early preparedness for priority critical minerals projects as they advance through the regulatory processes.

If the federal Minister approves the substitution request, the province will commit to meet the legislative requirements of the federal IA process for the remainder of the assessment process and fulfill the conditions for substitution under the IAA set out in the Cooperation Agreement and the Substitution Decision. At the end of the EA process, the BC EAO will provide a report to both the provincial and federal Ministers for their consideration and decision.

5.3 Federal Land and Federal Funding

There is no proposed or anticipated federal financial support being provided to carry out the Project. In addition, there are also no federal lands that will be used for undertaking the Project.

5.4 Permits and Approvals

In addition to a Provincial EA and Federal IA, the Project will also require various permits, approvals and authorizations to proceed to the construction and operation phases. The required federal and provincial permits, approvals and authorizations are listed in Tables 5.4-1 and Table 5.4-2.

5.5 Federal Matters

The Project is not expected to interact with Reserves as listed in Section 3.2.1, Table 3.2-1, given the distances between the Mine site and local First Nations communities or dwellings. There are no interprovincial or international interests that may be impacted by the Project.

5.6 Proposed Regulatory Timing and Schedule

The Project is currently in the initial phases of engineering planning and design. Environmental baseline data have been collected across several subject areas, such as water quality and quantity, wildlife and fish habitat. Some of the data has been collected over the course of more than a decade, and Surge is currently completing work to bring the baseline data information into a relevant timing status for EA completion.

The general timeline for Project development through the regulatory process to a construction decision is detailed in Table 5.6-1 below. Surge intends to advance applicable provincial and federal permitting activities concurrently with the EA, where supported by regulators and where sufficient technical information is available. Concurrent permitting would allow both processes to move forward in parallel and reduce overall timelines; Surge anticipates that clarity on concurrent permitting opportunities will be realized over the coming months.

TABLE 5.4-1 ANTICIPATED PROVINCIAL PERMITS AND APPROVALS

Permit/Approval	Responsible Agency/Statute	Project Component(s)	Regulatory Context
Environmental Assessment Act Certificate	BC EAO; *Environmental Assessment Act* (SBC 2018, c 51)	All	Strategic level approval is required for the Project in considering relevant impacts, factors and mitigations.
Mines Act Permit	MCM *Mines Act* (RSBC 1996, c 293)	Pit, plant, processors, conveyors, TWMF, Waste Rock dumps, truck shop, and explosives magazine storage (mine footprint) Reclamation and Closure Plan, and establish Mine Reclamation Security	HSRC Section 10 Mine Permit for construction, operation, and closure; Explosives Magazine Storage and Use Permit. Approval of the mine plan, construction, operation, and the reclamation and closure plan. Mine reclamation security. Environmental Management System (management plans), Authority to establish mine security. Worker occupational health and safety: Roles and responsibilities of Qualified Persons, and Indigenous requirements in permitting.
Mining Lease	MCM *Mineral Tenure Act* (RSBC 1996, c 292) and *Mineral Tenure Act* Regulation (BC Reg 529/2004)	Claims conversion to a mining lease	Mining Lease conversion/issuance; application requirements under the *Mineral Tenure Act* and regulations. A mining lease is an interest in land that conveys ownership of minerals and permits the production of minerals within the lease area.
Effluent Discharge Permit	Ministry of Environment and Climate Change Strategy (ENV) EMA (SBC 2003, c 53) and Waste Discharge Regulation (BC Reg 320/2004)	Mine component, which results in the discharge of mine effluent to surface water or groundwater	Waste discharge to surface or groundwater.
Air Emission Discharge Permit	ENV EMA (SBC 2003, c 53) and Waste Discharge Regulation (BC Reg 320/2004)	All emission sources	Authorizes the discharge of emissions to the air, including fugitive dust.
Solid Waste Discharge Permit	ENV EMA (SBC 2003, c 53) and Waste Discharge Regulation (BC Reg 51/2024)	Landfill/sludge disposal	Authorizes disposal of inert, solid waste into an engineered landfill; supported by Waste Management Plan.
Municipal Wastewater Discharge Authorization	ENV EMA and Municipal Wastewater Regulation (BC Reg 87/2012)	Camp wastewater and sewage treatment and disposal system	Authorized discharge of treated sewage or municipal effluent to water.

Permit/Approval	Responsible Agency/Statute	Project Component(s)	Regulatory Context
Hazardous Waste Registration	ENV EMA and Hazardous Waste Regulation (BC Reg 63/88)	Site facilities	Register hazardous waste storage and transfer.
Wildlife Permits	BC Ministry of Water, Land and Resource Stewardship (WLRS) *Wildlife Act* (RSBC 1996, c 48) and Permit Regulation (BC Reg 53/2000)	Mine and infrastructure	Wildlife salvage, surveys, and habitat disturbance authorization.
Short-Term Water Use Approval	WLRS *Water Sustainability Act* (SBC 2014, c 15) and Water Sustainability Regulation (BC Reg 36/2016)	Construction—Mine footprint	Approval for short-term use of water (≤24 months).
Changes in, About a Stream-Permit	WLRS *Water Sustainability Act* (SBC 2014, c 15)	Stream crossings	Authorization for changes in and about a stream, i.e., modification to the nature of a stream or activity/construction within a stream channel.
Water Licence	WLRS *Water Sustainability Act* (SBC 2014, c 15)	Water supply	Long-term authorization for diversion, storage, and use of water.
Licence of Occupation	WLRS *Land Act* (RSBC 1996, c 245)	Linear infrastructure	Authorizes temporary occupation of Crown land.
Heritage Conservation Act Permits	BC Ministry of Forests (FOR) *Heritage Conservation Act*	All project footprints	Site visit, investigation, or alteration of archaeological sites.
Heritage Conservation Act Concurrence Letters	FOR *Heritage Conservation Act* (RSBC 1996, c 187)	All areas	Confirms adequacy of archaeological assessment.
Licence to Cut	FOR *Forest Act* (RSBC 1996, c 157)	Clearing areas	Licence to cut Crown timber and vegetation.
Special Use Permit	FOR *Forest and Range Practices Act* (SBC 2002, c 69)	Quarries and bridges	Crown land use for infrastructure.

Permit/Approval	Responsible Agency/Statute	Project Component(s)	Regulatory Context
Road Use Permit	FOR *Forest Act* (RSBC 1996, c 157)	FSR use	Industrial use of forest service roads.
Construction Permit for a Potable Water Well	BC Ministry of Health, Northern Health Authority (NHA) *Drinking Water Protection Act* (SBC 2001) and Regulation (BC Reg 200/2003)	Mine footprint—Camp	Section 7 Exploration of a groundwater well for domestic water use.
Water System Construction Permit	NHA *Drinking Water Protection Act* (SBC 2001) and Regulation (BC Reg 200/2003)	Mine footprint—Camp	Section 7 Construction of a potable water system.
Drinking Water System Operations Permit	NHA *Drinking Water Protection Act* (SBC 2001) and Regulation (BC Reg 200/2003)	Mine footprint—Camp	Section 8 Operation of a potable water system.
Permit for Regulated Activities	BC Ministry of Health *Public Health Act* (SBC 2008, c 28) and Sewerage System Regulation (BC Reg 326/2004)	Mine footprint Camp	Section 3 & Section 4 Covers regulated activities that may endanger health if prescribed standards are not met, including construction of industrial camps, provision of potable water, processing of wastewater, and management of septic systems.
Food Premises Permit	BC Ministry of Health *Public Health Act* (SBC 2008, c 28), Food Premises Regulation (BC Reg 210/99)	Mine footprint Camp	Section 8 Approve the opening and operation of food service facilities.
Geotechnical / Site Investigation Permits	WLRS / MCM *Water Sustainability Act / Mines Act*	Site-wide	Authorizes drilling, trenching, and investigation activities.

Note:
This table represents a preliminary list of anticipated provincial permits and approvals. The full suite of required authorizations will be confirmed through the EA process and in consultation with applicable regulatory agencies.

TABLE 5.4-2 ANTICIPATED FEDERAL PERMITS AND APPROVALS

Permit/Approval	Responsible Agency	Federal Statute	Regulatory Context
Decision Statement	IAAC	*Impact Assessment Act* (SC 2019, c 28)	A Decision Statement is required by the federal Minister of Environment for a designated project. SACC applies to all designated projects under the IAA and will be addressed as part of the federal IA process.
Fisheries Act Request for Review (RfR)	Fisheries and Oceans Canada (DFO)	*Fisheries Act* (RSC 1985, c F-14)	Initial review to assess whether works may result in the death of fish or harmful alteration, disruption, or destruction (HADD).
Fisheries Act Authorization	DFO	*Fisheries Act* (RSC 1985, c F-14)	Authorization is required where impacts to fish habitat cannot be avoided.
Metal and Diamond Mining Effluent Regulations (MDMER) Schedule 2 Amendment	ECCC	*Fisheries Act*, RSC 1985, c F-14 (as amended 2019) / MDMER	Schedule 2 listing required to use natural waterbodies (lakes, rivers, creeks) that are frequented by fish as tailings impoundment areas or for disposal of other mine waste. The application includes the assessment of alternatives to the disposal of mine waste in fish-bearing waters and the Fish Habitat Compensation Plan.
Migratory Birds Convention Act Authorization	ECCC	*Migratory Birds Convention Act* (SC 1994, c 22)	Required if activities affect migratory birds or nests.
Species at Risk Act Authorizations	ECCC, DFO, and Parks Canada	*Species at Risk Act* (SC 2002, c 29)	Authorization is required where listed species or critical habitat are affected.
Explosive Licences and Permits	Natural Resources Canada	*Explosives Act* (RSC 1985, c E-17)	Licence required for storage and use of explosives.
Radio Licence	Innovation, Science and Economic Development Canada (ISED)	*Radiocommunication Act* (RSC 1985, c R-2)	Authorization to operate radio equipment.
Transportation of Dangerous Goods Permit	Transport Canada (TC)	*Transportation of Dangerous Goods Act* (SC 1992, c 34)	Authorization for transport and handling of dangerous goods.
Nuclear Substances Authorization	Canadian Nuclear Safety Commission	*Nuclear Safety and Control Act*	Authorization for use/storage of radioactive materials.
Navigation Protection Program Approval	TC	*Canadian Navigable Waters Act* (RSC 1985, c N-22)	Approval for works affecting navigable waters.

Note:
This table represents a preliminary list of anticipated federal permits and approvals. The full suite of required authorizations will be confirmed through the EA process and in consultation with applicable federal regulatory agencies.

TABLE 5.6-1 DETAILED CRITICAL PATH AND REGULATORY SCHEDULE

EA Stage/Phase	Key Activities and Deliverables	Legislated Duration	Target Timeline	Key Milestones and Notes
Pre-EA Preparation and Early Engagement Initiation	Prepare and submit IPD to the EAO and IAAC and the Engagement Plan to the EAO. Continue baseline studies. Engagement with First Nations, government agencies, and the public.	Proponent driven	Q4 2025–Q4 2026	IPD submitted to the EAO and IAAC. Engagement Plan to the EAO. Baseline programs. Early Project engagement with Wet'suwet'en and Cheslatta Carrier Nation.
Early Engagement	EAO, in coordination with IAAC, facilitates engagement on IPD with First Nations, government agencies, and public. Proponent participates and responds to feedback. EAO and IAAC issues Joint Summary of Issues and Engagement and EAO identifies Participating Indigenous Nations.	90 days (legislated)	Q4 2026–Q1 2027	issues Joint Summary of Issues and Engagement issued. EAO identifies Participating Indigenous Nations. EAO direction received on requirements for Detailed Project Description (DPD).
DPD	Proponent prepares DPD. EAO reviews with First Nations and government agencies. Proponent prepares draft Application Information Requirements (AIR). Substitution decision may be made by the federal Minister of Environment, Climate Change and Nature.	~ 60 days (proponent driven)	Q1 2027	DPD submitted to the EAO. Draft AIR provided to the EAO.
Readiness Decision	EAO decides if the Project is ready to commence an EA under the EAA.	No legislated timeline	Q1 2027	EA Readiness Decision.
Process Planning (Process Order)	EAO develops EA Process Order in consultation with First Nations, agencies, and proponent. Establishes scope, procedures, Technical Advisory Committee (TAC), Community Advisory Committee (if required), AIR, and Assessment Plan.	120 days min (legislated)	Q2 2027–Q3 2027	EA Process Order issued, including AIR and Assessment Plan. TAC established. CAC may be established.
Application Development	Proponent develops EAC Application per Process Order, including technical and baseline studies, effects assessment, mitigations.	~12–18 months (proponent driven)	Q1 2027–Q2 2028	EAC Application submitted to EAO.

EA Stage/Phase	Key Activities and Deliverables	Legislated Duration	Target Timeline	Key Milestones and Notes
Application Review	EAO, First Nation and TAC review of application. Public comment period. Proponent responds to information requests. Additional time to prepare a Revised Application, preparation, and submission.	180 days max (legislated) + ~ 45 days (proponent driven)	Q2 2028–Q1 2029	Proponent submits (initial) application. All comments address to the EAO's satisfaction. Order issued regarding Revised Application requirements. Proponent submits Revised Application.
Effects Assessment and EAO Recommendation	EAO prepares Assessment Report evaluating effects, develops proposed conditions, and prepares recommendation to Ministers. IAAC prepares draft Decision Statement. First Nations, proponent and public reviews draft report and other draft materials.	150 days max (legislated)	Q1 2029–Q3 2029	Assessment Report completed. Proposed conditions and certified project description developed.
Ministers' Decision (BC EA Certificate)	Provincial Ministers decide on EA Certificate issuance and conditions.	30 days max (legislated)	Q3 2029	EA Certificate issued with conditions.
Minister's Decision (Canada Decision Statement)	Federal Minister of Environment, Climate Change and Nature decide on issuance of a Decision Statement, with conditions.	30 days max (legislated)	Q3 2029	Decision statement issued with conditions.
BC Permits (e.g., *Mines Act*, EMA, other Permits)	Applications for permits required for the construction and operation of the Project are submitted, reviewed and approved. Provincial permits and authorizations are listed in Section 5.4. EA Certificate must be issued prior to permit approvals.	Post-EAC	2028–2029	All BC statutory approvals provided for the construction and operation of the Project.
Federal Authorizations (e.g., *Fisheries Act*, MDMER, *Canadian Navigable Waters Act*)	Applications for authorizations required for the construction and operation of the Project are submitted, reviewed and approved. Federal permits and authorizations are listed in Section 5.4. The Decision Statement must be issued prior to authorizations.	Post-federal Decision Statement	Q4 2030	All federal authorizations received. Construction-ready status achieved Q4 2030.

6. First Nations

The Project is located within the Wet'suwet'en *Yintah*. Surge is actively engaging with the Wet'suwet'en Hereditary Chiefs and Houses, through the OW, and other potentially impacted communities in the region, including the Witset First Nation (Witset), Wet'suwet'en First Nation (WFN), Nee Tahi Buhn Indian Band (NTB), Skin Tyee First Nation (STFN), and Cheslatta Carrier Nation (CCN). An overview of these Nations is provided in Section 6.2 (see Table 6.2-1).
Surge believes that responsible advancement of the Project depends on working respectfully and collaboratively with First Nations whose rights and interests are connected to the Project Area. Surge's approach to engagement is grounded in transparency, relationship building, and the pursuit of free, prior, and informed consent.

6.1 Potential Effects of the Project on Indigenous Interests

Surge recognizes that the First Nations and communities will have diverse scopes of engagement and consultation. Surge also recognizes that providing a clear and informed pathway toward seeking consent is key to advancing the Project.

As part of the engagement process, Surge intends to work with interested parties to understand, define, and address potential adverse impacts of the Project as an essential function of the assessment process.

From Surge's engagement to date (described in more detail later in this section) and from publicly available data, it is expected that the First Nations may have interests and/or see potential effects on their nations that may be associated with:

- Existing and cumulative effects on Indigenous rights, cultural values, and the exercise of those rights;
- Indigenous health and well-being;
- Indigenous governance and decision-making;
- Indigenous title to the lands, waters, and resources within their territories, including economic interests in those lands, waters, and resources;
- Indigenous rights related to the use of terrestrial, fresh water, heritage, visual, and other resources within these territories, which may include harvesting activities, such as fishing, hunting, trapping and gathering, and other traditional and cultural activities (e.g., travel routes, cultural expression, and spiritual practices);
- Changes in usage of traditional territories and desired future use in the Project Area;

- Incorporation of Traditional Knowledge and Cultural Land Use Data with respect to lands and resources across their traditional lands;
- Understanding of and participation in the potential positive effects that may come from the Project; and
- Understanding of potential negative effects of the Project and participation in the design and implementation of the appropriate measures to avoid or mitigate identified adverse effects.

A summary of the key issues raised to date is provided in Table 6.12-1 at the end of this chapter.

6.2 First Nations Identification

Consistent with the EAO's Early Engagement guidance, First Nations identified for engagement on the Project are those with asserted or established Aboriginal rights, title, or interests that may be affected by Project activities. Identification has been informed by the location of Project components relative to traditional territories, including information available through the Province's Consultative Areas Database, as well as Surge's extensive history of engagement in the region during mineral exploration activities.

Additional considerations have included First Nations identified through Crown referral processes associated with exploration permitting, as well as direct outreach and ongoing dialogue with First Nations that have expressed interests in, or concerns regarding, the Project. Through these combined sources of information, Surge has sought to identify nations that may have interests relevant to the Project and to provide opportunities for meaningful participation in the EA process. The identified First Nations are listed in Table 6.2-1.

The identification of potentially affected and interested First Nation groups is expected to continue throughout the Early Engagement phase and EA process. Consistent with EAO guidance, additional nations, communities, rights holders, or knowledge holders may be identified as engagement progresses, and opportunities for participation will be adjusted accordingly to reflect new information, evolving understanding of potential Project interactions, and input received from First Nations and the provincial and federal governments.

6.3 First Nations Engagement

Surge has maintained relationships with the Wet'suwet'en and CCN over many years, beginning during early exploration of the Berg and Ootsa deposits (Ootsa is a separate project close to Berg, but is not part of the Project's mineral claims or Project Area). That relationship has deepened over time, grounded in a genuine interest in understanding each Nation's governance structures, rights, and connection to the land within the Project footprint and area.

TABLE 6.2-1 FIRST NATIONS OVERVIEW—BERG COPPER PROJECT AREA

First Nation	Governance	Traditional Territory/Location	Population and Proximity	Surge Agreement/Status
Office of the Wet'suwet'en (OW) Wet'suwet'en Hereditary Chiefs	Administrative arm for Hereditary Chiefs five Clans (Gilseyhu, Laksilyu, Tsayu, Laksamshu, and Gitdumden)	Core Project footprint is within Thin House (Yextsowiten) of the Gilseyhu Clan.	N/A	Communications and Engagement Agreement (2013; amended May 2024); Capacity Funding Agreement (OW-led Assessment, March 2026).
Witset First Nation (Witset)	Elected Chief and Council	The community of Witset is located along the west side of the Bulkley River at Moricetown Canyon; asserted territory includes the Project Area.	2 reserves (~666 ha); closest reserve area ~130 km from Project	Witset leadership and direct EA engagement planned; capacity agreement being pursued.
Wet'suwet'en First Nation (WFN)	Elected Chief and Council; economic arm: Yinka Dene LP (YLP)	Asserted territory includes Project Area. WFN is located west of Burns Lake (Decker Lake area).	~250 members; 11 reserves (~700 ha); closest reserve ~66–80 km from Project	Collaboration and Cooperation Agreement (Feb 2024).
Skin Tyee First Nation (STFN)	Elected Chief and Council	Uncha Lake / Southbank area; asserted territory includes Project Area.	192 members; 7 reserves (~412 ha); closest reserve ~90 km from Project	Skin Tyee leadership and direct EA engagement planned.
Nee Tahi Buhn First Nation (NTB)	Elected Chief and Council	Francois Lake area; asserted territory includes Project Area.	5 reserves (~144 ha); closest reserve ~100 km from Project	Nee Tahi Buhn leadership and direct EA engagement planned.
Cheslatta Carrier Nation (CCN)	Elected Chief and two Councillors	Southside area south of Francois Lake; asserted territory includes Project Area.	383 members; 17 reserves (~1,403 ha); Band office ~110 km from Project	Letter of Understanding (2010; amended 2013)—in good standing.

Surge's approach to engaging with First Nations is centred on building lasting, meaningful partnerships grounded in respect for Indigenous rights, title, and cultural integrity. All work with the First Nations whose territory the Project directly overlaps is guided by the following principles:

- **Early and Genuine Collaboration.** We commit to engaging and working with First Nations leadership and communities at the earliest stages of Project design and development, to allow decisions to be shaped by that engagement.
- **Recognition of Rights and Seeking Free, Prior, and Informed Consent.** We listen to understand. We take seriously the recognition of Indigenous rights and interests, with specific attention paid to seeking Free, Prior, and Informed Consent; supporting meaningful engagement before Project decisions are taken.
- **Respect for Cultural Integrity.** We respect the distinct cultures, values, and teachings of each First Nation whose territory our Project activities overlap and are grateful for the opportunity to learn.
- **Fulfilling Consultation and Accommodation Obligations.** We meet our obligations to consult, engage, and where required, accommodate; not because the law requires it, but because it is the right foundation for the Project.
- **Ongoing Cultural Learning.** We actively pursue cultural education and learning as an organization. Understanding the history, relationships, and knowledge systems of the First Nations we work alongside is the work of every member of our team.
- **Transparent Partnership.** Open and transparent partnership with First Nations communities and leaders, engaging on the economic aspirations and opportunities that the Project can support and help realize for First Nations.

The Project is viewed as an opportunity to advance shared goals and support each Nation in realizing its economic, cultural, and community aspirations for present and future generations.

Table 6.2-1 provides an overview of the First Nations in the vicinity of the Project Area.

6.3.1 First Nations Engagement Objectives

Surge is committed to reconciliation with the Wet'suwet'en and CCN by seeking a consent-based approach to Project development early in the process-and maintaining this approach through the life of the Project. This commitment is reflected in Surge's mandate and management practices, and a genuine effort to understand and accommodate First Nation interests in Project design. Engagement with potentially affected Nations has evolved through each stage of exploration and Project advancement, with information sharing, knowledge exchange, and community participation actively informing Project development to date.

The objectives of ongoing engagement and consultation are to:

- Deepen relationships with all potentially affected First Nations and peoples;
- Facilitate First Nation-led assessment of the Project and its potential effects;
- Ensure timely and transparent information sharing to enable meaningful comment and the development of mitigation measures prior to final design decisions;
- Ensure active economic participation and awareness of Project opportunities across the full Project life; and
- Support Crown agencies in fulfilling their duty to consult in connection with the Project's authorizations.

Surge's approach to engagement is centred on building lasting, meaningful partnerships rather than transactional consultation. To date, this has resulted in formal agreements that support Nation capacity and resources, as well as First Nation-led assessment processes that reflect Wet'suwet'en principles, priorities and protocols.

6.3.2 Traditional Knowledge

Surge is committed to working collaboratively with First Nations to incorporate Traditional Knowledge (TK) and cultural land use information into Project planning, design, and assessment. TK provides valuable insights into environmental conditions, cultural values, land use practices, and areas of importance that can help build a more complete understanding of potential Project impacts. Surge will support TK studies, including those related to environmental, historical, cultural, and land use values, and will work with First Nations to understand and appropriately apply this knowledge throughout the Project lifecycle.

Surge recognizes and respects Indigenous data sovereignty and the rights of First Nations to maintain, control, protect, and develop their intellectual property, including cultural heritage, TK, and traditional cultural expressions, consistent with the principles of the United Nations Declaration on the Rights of Indigenous Peoples. TK will only be collected, used, and shared in accordance with the laws, customs, protocols, and permissions established by each First Nation. Where confidential information is shared, Surge will take appropriate measures to protect it from unauthorized disclosure and inappropriate use, ensuring that TK is managed in a respectful and culturally appropriate manner.

6.4 First Nation Agreements

6.4.1 Provincial Agreements

The Province of BC has entered into various agreements with the Wet'suwet'en and CCN predominantly relating to the forestry and liquefied natural gas. CCN has also entered into agreements related to the historic flooding of their territory in the creation of the Kenney Dam and Nechako Reservoir. While these agreements are not specific to the Project, they reflect an established provincial relationship with both Nations.

Of direct relevance to the Project, the Province has previously entered into revenue sharing agreements with both Nations in connection with the adjacent Huckleberry Mine, under which the CCN and WFN received 5.2% and 4.7%, respectively, of annual Incremental Mineral Tax Revenue. These prior agreements and precedents help build relevant context and knowledge for Surge as the Project advances.

In 2020, the Province and the Government of Canada jointly signed a Memorandum of Understanding (MOU) with the Hereditary Chiefs of the Wet'suwet'en, formally recognizing Wet'suwet'en rights and title under their hereditary governance system. The MOU contemplates future agreements on resource and wildlife stewardship; Surge is not aware of those subsequent agreements having been concluded to date.

6.4.2 Project-Specific Protocols and Agreements

Surge has entered into several direct agreements, protocols and memorandums of understanding with the local First Nations. In addition to long-standing Communications and Engagement Agreements with the CCN, WFN, STFN and the OW, Surge has negotiated advanced development agreements with the OW and is actively engaging with Witset on a similar framework. Economic opportunities, including contracts, field programs, and technical work, are offered to local First Nations communities as a priority, including through soliciting tenders from local companies holding MOUs or partnerships with these First Nations. Many of the economic development-focused discussions are driven through the economic development arm entities such as the Yinka Dene Limited Partnership (WFN), Kyah Development Corp (Witset); or Cheslatta Contracting (CCN).

The OW have entered into a Capacity Funding Agreement with Surge in April 2026 to support deliverables associated with the OW-led Project Assessment and provincial EA process, as well as the associated community and house engagement processes focused on supporting the hereditary governance structure.

Surge continues to work with the leadership of Witset, Skin Tyee, Nee Tahi Buhn and the WFN to determine the appropriate agreements and capacity required to participate and inform the Project design through direct engagement and the EA process.

6.5 Wet'suwet'en Nation

6.5.1 Wet'suwet'en Hereditary Governance

The following description of Wet'suwet'en hereditary governance is derived from publicly available information and discussions with the OW, while recognizing that that the Wet'suwet'en will determine how they wish their people, governance systems, and culture to be reflected within the assessment process.

The Wet'suwet'en peoples are traditionally governed under a matrilineal hereditary system of thirteen House Groups, led by Hereditary Chiefs. The Wet'suwet'en Houses, as represented and led by the Hereditary Chiefs, are a sovereign traditional governing body that has maintained connection to the Yintah since time immemorial. According to Wet'suwet'en and reiterated in the court case of the Delgamuuk/Gisday'wa decision; the Wet'suwet'en have never ceded, surrendered or in any way relinquished Title or Rights over any portion of the 22,000km^2 Yintah. The Wet'suwet'en Yintah encompasses the majority of the Bulkley River drainage or valley, including Widzin Kwah (the Bulkley/Morice River), which flows into the Skeena River just west of Tse Kya. The Wet'suwet'en have lived on these lands for over 6,000 years, maintaining continuous presence, governance, and connection to their Yintah.

The Wet'suwet'en, consisting of five Clans and thirteen House Groups with Members living in communities both on and off-reserve and holding Rights and Interests throughout the Yintah. The six Wet'suwet'en communities (Bands) defined by the *Indian Act* are communities within the Wet'suwet'en Nation although not all House and Clan Members are Band Members.

The Wet'suwet'en are composed of five Clans: Gilseyhu (Big Frog), Laksilyu (Small Frog), Gitdumden (Bear/Wolf), Laksamshu (Fireweed), and Tsayu (Beaver).

The Project falls within the territory of the Thin House (Yextsowiten) of the Gilseyhu Clan. The Yextsowiten House is represented at the leadership level by Pat Morris, (Chief Casbit), who along with Herb Naziel, (Chief Samooh) and Helen Michell (Chief Ludooks) represent the Gilseyhu Clan as a whole. Members of the Gilseyhyu Clan live across the communities and may work elsewhere in BC or otherwise. There are numerous other chiefs named within the Yextsowiten who are engaged in the Project discussions and will inform Surge's engagement efforts as the Project advances.

Table 6.5-1 provides an overview of Wet'suwet'en Nation's clans and houses.

TABLE 6.5-1 WET'SUWET'EN CLANS AND HOUSES

House Name (Primary Spelling)	Alternate Spellings	English Translation
Gilseyhu/C'ilhtsëkhyu—*Big Frog Clan*		
Yex T'sa Wit'ant'	Yikh Ts'iwit'an' / Yext'so wit'en	Thin House
Yex T'sa Wilk'us	Yihk Tsawilhiggis / Yexsowilkas	Dark House
Kayex	K'iy Yikh / KaiYex	Birchbark House
Liksilyu / Likhsilyu—*Small Frog Clan*		
Tsee K'al K'e Yex	Tsë Kai K'iyikh / Tse Kalbai Yex	House on Top of the Flat Rock
Kwen Beegh Yex	Kwin Begh Yikh / Kwen Bea Yex	House Beside the Fire
G'en Egh La Yex	C'inegh Lhay Yikh / G'inehklai Yex	House of Many Eyes
Tsayu—*Beaver Clan*		
Djakanyex	Djakan Yax / Tsa Kën Yikh	Beaver House
Tsa K'ex Yex	-	Rafters on a Beaver House
Laksamshu/Likhts'amisyu—*Fireweed and Owl Clan*		
Tsaiyex	Tsai Yex / Sa Yikh	Sun House
Medzeyex	Misdzï Yikh / Medze Yex	Owl House
Gitdumden/Gidimt'en—*Bear/Wolf Clan*		
Cassyex	Cas Yex / Cas Yikh	Grizzly House
Kaiyexweniits	KëYikh Winïts / Keexwinits	House in the Middle of Many
Anaskaski	Insiggisgï	Where it Lies Blocking the Trail

Note:
Multiple spellings reflect different orthographic systems used across academic, government, and Nation-preferred documentation. Where a Nation-preferred spelling is established, that form should take precedence.

6.6 Office of the Wet'suwet'en—Wet'suwet'en Hereditary Chiefs

6.6.1 General Information and Location

The OW, based in Smithers, BC, serves as the central administrative and representative body for the Hereditary Chiefs across all five Clans and functions as the primary point of engagement under the Wet'suwet'en hereditary governance system. The staff and personnel at the OW act as facilitators for communications between industry or government and the Nation and its Chiefs. The Hereditary Chiefs represent approximately 3,000 to 3,200 Wet'suwet'en people organized through the 5 Clans and 13 house groups across the Wet'suwet'en traditional territory.

The OW is noted as being progressive and dedicated to the preservation and enhancement of the Wet'suwet'en culture, traditions and territories; working as one for the betterment of all.

As stated on the OW website, the OW has strategic goals to:

- Ensure a self-reliant nation;
- Ensure an effective, responsive, and accountable infrastructure;
- Ensure continual and effective communications;
- Ensure responsible jurisdiction of the resources for equitable and sustainable use;
- Ensure effective financial management; and
- Ensure a government model based upon the solid foundation of our hereditary system.

The Wet'suwet'en Nation has strong ties to its cultural history, with high value placed on the Yintah, and specifically, when something is taken from the land, it must be replaced. The Nation relies on a traditional governance system of Hereditary Chiefs that are guided and prepared for the role by elders and family members across multiple generations prior to being given the role of Chief at a special naming feast. Members of the community who have been given a traditional name are held in ultimate regard, having earned the honour to act on behalf of the Nation. Within the governance system is a reliance on communication and sharing of ideas and plans with all Clans when a decision is to be made; for example, input is taken before any one Clan or Chief choosing a direction on a particular subject, such as naming a Chief or providing consent to a project such as the Berg Copper Project.

6.6.2 Summary of Engagement Activities

In 2013, the OW, representing the Gilseyhyu Clan, and Surge signed a Communications and Engagement Agreement (CEA). The agreement formalized good-faith engagement grounded in mutual respect for each party's cultures, values, perspectives, interests and aspirations, with the intent of building a long-term, mutually beneficial relationship, and provided funding for capacity development and educational support. OW issued a letter of support for Surge's ongoing Project development activities at signing. Surge operated under this agreement in good standing for more than a decade.

Between 2013 and 2016, Surge provided regular updates by phone, in person, email and written correspondence. Correspondence continued past 2016 but at a lower frequency, reflecting market conditions and a slower pace of Project advancement.

Engagement increased in 2021, coinciding with the Proponent's purchase of the Berg claims and OW's addition of a Referrals Coordinator. From 2021 to 2023, discussions covered exploration and operations at Berg and Ootsa, permit amendments, and a shared interest in updating the CEA. Updates included summaries of public disclosures, among them the Berg PEA released in June 2023. Following numerous iterations, the amended CEA was signed in May 2024.

Also in 2024, Surge presented a Project introduction to elders, OW members and OW personnel at the OW offices in Smithers, which led to a July 2024 site visit for House Chiefs, Elders, and community members; this event was well received by attendees. A Clan Runner was actively engaged in 2024 by the OW to support and aid in communications between the OW, Surge and broader Wet'suwet'en community and Yextsowiten (Thin House) Elders.

The amended 2024 CEA sets the protocols Surge uses to engage OW and its communities: respect for values, perspectives, interests and aspirations; avoidance of adverse impacts on Wet'suwet'en Title and Rights; and mitigation of adverse environmental and socio-economic impacts. It recognizes the Nation's need for a comprehensive understanding of the Project at all stages, provides for capacity building and economic opportunities, and sets the stage for further agreements as the Project advances.

In the 2026 Capacity Funding Agreement, Surge and OW have further formalized their partnership in working together via the agreement, which focuses on a specific assessment process led by the OW with Yextsowiten community members in a manner that surfaces community well-being, cultural land use, issues, interests and impacts. Surge understands the five-stage process is structured to support Hereditary Chiefs and their House members in independent, informed decision-making, considering cultural and community well-being, health and wellness, impacts to rights and interests, and community awareness.

At an All-Chiefs meeting in April 2026, continued engagement with the Hereditary Chiefs was requested and to continue to keep water and salmon forefront as some of the Hereditary Chiefs have strong interests in preserving the Yintah.

In recognition of the hereditary governance system and Clans and House structure, Surge has funded an external Clan runner role to enable a more comprehensive contact list and awareness of who Thin House members may be, developed for the Yextsowiten members across all communities. It is hoped this will be of benefit to not only Surge but also OW.

This work is reconciliation focused to original matrilineal ties, as well as in support of the hereditary governance system of the Wet'suwet'en. This work will not only support the OW, Yextsowiten membership and broader community of Wet'suwet'en but it will also support the Proponent in direct engagement with the House members most affected by the Project. Surge is optimistic and encouraged by these early and strong signs of working in partnership with the Wet'suwet'en.

Table 6.6-1 provides an overview of the key engagement activities with the OW.

TABLE 6.6-1 SUMMARY OF KEY ENGAGEMENT ACTIVITIES—OFFICE OF THE WET'SUWET'EN

First Nation	Key Activities
Office of the Wet'suwet'en	Initiate engagement in 2013, introduction to company, discussion surrounding Clan and leadership structure.
	Field trip to Surge resource site at Ootsa including WFN members in August of 2013.
	Renewed engagement in 2021, focus surrounding Indigenous Participation in Project operations and understanding.
	CEA signed in 2013.
	Letter of Support from the OW for company operations provided in 2013.
	2014-2020 Regular communications between Surge and the OW via phone, in person discussions, and email contacts.
	2021 Introduction of Surge to OW referrals coordinator and primary contact. Presentation of Project highlights and planning.
	2021 Initiate discussions on amendments to CEA, followed by numerous discussions and iterations prior to signing in 2024.
	2021-2023 Active discussions surrounding the acquisition of the Berg claims by Surge and planning surrounding development and information transfer.
	2022 Engagement surrounding amendment to Berg Exploration Permit. Discussions and Transfer of information surrounding exploration plans.
	2023 Around 40 various engagement touch points across various mediums.
	March 2023 Surge presented updated exploration planning including contractor and employee opportunities. Request for Surge to reinitiate Communications Agreement discussions.
	2024 Approximately 150 engagement touch points across various mediums.
	April 2024 Introductory meeting with Wet'suwet'en Elders, members and personnel.
	May 2024 Signing of amended CEA.
	July 2024 Site Visit to Berg Copper Project for Casbit, several OW Elders, members and OW personnel.
	August 2024 Meeting at OW offices with Elders, members and personnel regarding Indigenous-led assessments and EA logistics and capacity funding.
	Fall 2024 discussions surrounding draft documentation for preparation of IPD.
	November 2025 Project update (PowerPoint format) provided to the OW. Topics included Surge's role from a Canadian strategic minerals context, highlights of the Berg PEA, OW engagement, 2025 field program and road to PFS.
	February-March 2026 discussion around a Capacity Funding Agreement, Project Assessment Agreement.
	February 2026 Surge advised OW that the Project had been accepted into British Columbia's Critical Minerals Office, a designation intended to improve government coordination for priority critical mineral projects without changing regulatory or consultation requirements.
	March 2026 Surge discussed employment and training needs including use of OW guardians for site oversight and/or baseline sampling.

First Nation	Key Activities
Office of the Wet'suwet'en *(cont'd)*	April 2026 OW meeting—Discussions focused on planning for the upcoming field program, including drilling conditions and the environmental studies required to support the Project. OW Natural Resources outlined their capabilities in wildlife, vegetation, and fish habitat assessments, and discussed how their team could work alongside contractors to deliver the program. Participants highlighted the need to initiate wildlife surveys as soon as possible and to schedule nesting bird surveys during the May to June window. The role, availability, and qualifications of guardians were also discussed, with OW noting that its team of 10 to 13 members can support a range of environmental field activities. The meeting concluded with a discussion on Project communications, including how Wet'suwet'en, Yintah, and other potentially affected Nations and communities should be appropriately referenced in future public messaging.
	April 2026 Surge presented at an All Chiefs meeting in Smithers—press release material, Capacity Funding Agreement updates, field season planning.
	April 2026 Follow up meeting with OW to debrief All-Chiefs meeting. Continued discussions on field work program, capacity funding agreement, press release and house scoping session.
	May 2026 Meeting with the OW—Discussed Skeena Sustainability Assessment Forum; upcoming field program; and agenda/timing for a house scoping session.
	May-2026 Surge presented the Berg Copper Project details at the first House Scoping Session held by the OW in support of the OW assessment process.
	June 2026 Surge directly funds the Clan Runner/Liaison position for the Yextsowiten to reconcile family ties, and matrilineal connections across the communities in the north. This work will build and orient the House to full membership and distribution lists for community engagement and discussions.
	May-June 2026 Surge works directly with the OW technical staff to engage on the upcoming environmental field program across vegetation, wildlife and fisheries values. Many discussions about the focus of the work, the gaps in data regarding confidence in salmonid absence/presence within Nanika River upstream of falls, and approaches to capturing wildlife use with cameras/bait was discussed.
	June 2026 Meeting with OW staff—Discussed fisheries field program and schedule; tailings alternatives review; amendment and permit change for heli drill program; July site visit for Thin House members; economic and development opportunities; proposed Prince George information session with hereditary and elected leaders.
	June 2026 Meeting to discuss engagement on values (not just traditional and cultural land use; TWMF dam height, geotechnical and site stability studies; long term health of the Nanika watershed post Project; process and timing of tailings facility alternatives and considerations.
	June 2026 Fisheries Field Program Deep Dive—Mini-workshop held where the following was discussed: watershed context; previous and current baseline inventory work; salmon and habitat; eDNA and bull trout; and the 2027 spawning survey.
	June 2026 Meeting with OW technical and assessment teams—Discussed sharing of fisheries data; focus of upcoming field work; baseline heavy metals; utilization of existing OW fisheries programs and funding of eDNA/radio tags above Nanika Falls; and upcoming fisheries field shifts. A meeting was also held with ERM consultants and topics of discussion included data sources for terrestrial and wildlife programs, classification methodology; study area buffers; plant species of note; and wildlife surveys.
	June-July 2026 Invitations sent out to leadership for a site visit in July.
	July 2026 Meeting to discussion technical questions regarding field program, timing, and logistics.

First Nation	Key Activities
Office of the Wet'suwet'en *(cont'd)*	July 2026 Meeting to discuss letter of support for permit amendment (heli access), timeline for the consent agreement, Licence of Occupation and Temporary Use permit for drilling to occur in TWMF, mini workshop debrief on fisheries topics, set up for a post-season workshop, July 22 site visit, and a debrief on the Dan George Workshop.
	July 2026 Meeting to discuss Project Assessment Agreement, timing, and framing of community studies, OW assessment scoping session, timing and alignment for review of the IPD and DPD, critical path document and consent agreement.
	July-August 2026 OW technicians participated in the wildlife, fisheries, and vegetation field programs. Surge and OW engaged in discussions on these programs regarding comments and concerns on procedures and methodologies prior to OW participating in the field programs. July 2026 Site visit by Chief Casbit, Elders, and numerous Thin House Chiefs to discuss the Project and territorial interests.

6.6.3 Summary of Interests and Concerns

Traditional harvest is typically in August, when the community can make use of the salmon, berries of a wide variety, large and small game and traditional medicines. The importance of these aspects of culture and traditional ways of life is evident in discussions to date, and Surge looks to develop that understanding throughout the development process and ensure continued use of the land will be available across all phases of the Project. Surge will look to work with the OW to engage, consult, partner and understand how the Project can be developed in a responsible fashion.

The traditional governance system of the Wet'suwet'en Nation and its reliance on communication between Clans will lend well to ensuring that a process that seeks free and informed prior consent is followed throughout the EA process. While the Project lies within the Yextsowiten (Thin House) territory, which is one of three houses within the Gilseyhyu Clan's traditional territory, the Nation relies on informing all Clans in their decision-making process.

In addition to environmental and governance interests, the OW has also specified a high degree of importance on opportunities for Wet'suwet'en House Members. This includes current employment at Surge's exploration and baseline operations but discussions with the OW have also encompassed the long-term training and educational requirements for the Project. It is both Surge's and OW's intent that the Project opportunities bring economic, training, employment and skills benefits into the Wet'suwet'en Nation.

Additionally, the Wet'suwet'en Natural Resource Project Development Protocol sets out Wet'suwet'en policies related to natural resource management, principles of the Protocol will guide the Project design and assessment process and include:

- Assurance the development Project will not pose a threat of irreparable environmental impacts;
- Assurance the development Project will provide positive socio-economic benefits for all Wet'suwet'en;

- Assurance the development Project will not jeopardize, prejudice, or otherwise compromise Wet'suwet'en title, rights, and interests; and
- Environmentally responsible development of natural resources within Wet'suwet'en territory.

Wet'suwet'en people have expressed a key benefit of the Project is to ensure that multiple generations have access to gainful employment within their territory and communities. Surge and the OW will continue to discuss what each of these benefits may entail and how the Project can ensure the benefits best fit the Wet'suwet'en Nation's needs.

The OW operates as a non-profit society and looks to secure program funding through various sources. As it pertains to the development of the Project the OW has expressed concern and interest in how participation and capacity funding will progress throughout the Project. Surge and the OW currently operate under a Communications and Exploration agreement for general relationship structure; while the recently signed Capacity Funding Agreement from April 2026 sets out key deliverables and capacity funding provided to achieve those deliverables in the advancement of both the provincial regulatory work, but also the work underway in the OW-led Project Assessment. Surge's intent is to ensure that the OW has sufficient funds to actively participate in the development of the Berg Copper Project through the regulatory framework.

Table 6.6-2 provides a summary of key interests and concerns that have been presented to date by the OW, including feedback provided after review of the draft IPD. This list should not be considered exhaustive nor finalized. It is Surge's expectation that throughout the development process significant engagement will continue to occur and better define interests and concerns along with mitigation agreements that will look to address these interests.

TABLE 6.6-2 SUMMARY OF INTERESTS OR ISSUES RAISED BY THE OW

Topic	Interest or Issues Raised	Surge Comments or Approach to the Interest or Issue
Traditional Land Use	Follow Traditional cultures of when taking something from the earth one must replace it with something.	Surge is committed to continued discussions with OW on how to apply this principle within the context of the Project development. There are restoration and offset opportunities associated with certain valued components (VCs); however, further discussions together will help build and guide this approach for the Project.
	Traditional Harvest at specific times of year. Harvest can include salmon, berries, large and small game, and traditional medicines.	Surge is interested in understanding Wet'suwet'en vision for how this can most effectively be coordinated and integrated (e.g., through the work underway with OW, or through another means).
	Develop the Project in a way that minimizes effects on the environment and traditional land uses.	Surge is interested in early conversations with CCN and Wet'suwet'en on opportunities for focused restoration programs as identified in Scott McNay's Tactical Restoration Plan (2020) for the Tweedsmuir–Entiako Caribou herd for example. Additionally, seeking opportunities to minimize the Project footprint, use renewable energy to power the site infrastructure, and identify development approaches or benefits that can support traditional uses are ongoing discussions.

Topic	Interest or Issues Raised	Surge Comments or Approach to the Interest or Issue
Traditional Land Use *(cont'd)*	Yintah Management Directives shared with Surge.	Surge continues to consider Yintah Management Directives in the development of its own management plans.
Watershed Health	Maintaining the health of the Morice River Watershed is important for the well-being of salmon and Wet'suwet'en members.	Surge is committed to maintaining the health of the Morice River Watershed through the collection of baseline data, water quality management during construction and operations and continual monitoring to determine if there are any adverse effects on water quality.
Employment and Training	Ensure Opportunities are available for Wet'suwet'en House Members.	Surge has engaged with OW in the build up to this field season's deployment to ensure field technicians from Wet'suwet'en are employed and engaged in the field program design and implementation. Surge looks forward to ongoing engagement and discussions in this regard.
	Develop training for employment, both on-the-job and funded education and support.	Surge looks forward to better understanding training needs, capacity and focus areas for OW and Wet'suwet'en House Members more specifically.
Economic Opportunities	Ensure economic opportunities and participation in Project benefits are seen by the Wet'suwet'en Nation.	See above.
Assessment and Capacity Funding	Ensuring sufficient operational funds are available for OW to actively participate in the Project development process.	Surge has entered into a capacity funding agreement with OW to support and ensure capacity, and a clear Project assessment pathway are achieved.
Environmental Baseline	Ensure active participation of OW in the collection and analysis of baseline data to develop the Project.	See above.
	Use where possible OW in-house technical personnel for contracting and collection of baseline data.	See above; Surge intends to host a Fall Workshop with OW and technical teams from the communities to gather feedback and input from this year's field program and focus the discussion into next year's field program build and capacity.
	Gaps in baseline and collection methods and OW technicians not being able to participate in all fieldwork due to gaps. Comments and concerns on the field programs included not baiting cameras; not gathering eDNA across enough sites for fisheries, requests for additional sampling by Nanika falls as not considered a fish-barrier by OW technicians, requested further information on the number of cameras, and why not out for the duration of winter.	Surge appreciates the feedback provided regarding baseline program design and implementation. Surge is committed to continued collaboration with OW to better understand these concerns, review opportunities to strengthen data collection approaches where appropriate, and consider how OW input can inform future field programs and baseline studies.

Topic	Interest or Issues Raised	Surge Comments or Approach to the Interest or Issue
Consent-Based Approach	Develop the Project along with required assessments following an approach toward seeking informed consent that considers Wet'suwet'en rights and title.	Surge continues to work with the OW in better understanding how the Project assessment process will incorporate seeking free, prior, informed consent within the constructs of the hereditary governance and decision-making system.
Economic Reconciliation	Ensure clear communications by all parties of needs, capacities, opportunities for contracting.	Surge continues to work across all local First Nations communities and leadership to ensure a clear understanding of where partnerships exist and opportunities to support those partnerships through contracting, procurement and supplies and direct employment.
	Participation in the Project economics over the long-term basis.	Surge is interested in working with all local First Nations in advancing long term economic opportunities deriving from the Project.
	Opportunities for First Nation-owned businesses across all Project phases.	See above.

6.7 Witset First Nation

6.7.1 General Information and Location

Witset is a federally recognized First Nation located in northwestern BC. The community of Witset is one of the largest Wet'suwet'en communities and is situated on the Bulkley River (Wedzin Kwah / Wetzin Kwah) approximately 30 km west of Smithers and 32 km east of Hazelton along Highway 16. Historically known as Moricetown, the community formally re-adopted the name Witset in 2018. Approximately 2,100 residents are registered with the Nation with members living both on and off reserve. The largest off reserve population resides in Smithers.

The Nation administers seven Indian Reserves with a combined area of approximately 1,427 hectares. The largest and most populated reserve area is located around the community of Witset adjacent to the Bulkley River and the well-known Moricetown Canyon fishing site, which has been an important salmon harvesting location for thousands of years.

Witset is governed by an elected Chief, Deputy Chief and 10 councillors under the *Indian Act*. The current Chief is Elgin Cutler, elected in 2025. The community also maintains participation in the traditional Wet'suwet'en Hereditary Chief and Feast Hall governance system. This dual governance structure is a defining feature of Wet'suwet'en society.

Witset has entered into several formal resource management and revenue sharing agreements with BC. Most have centred around forestry and the offer of tenure and revenue sharing. The Nation has also entered economic participation agreements related to major infrastructure projects in the oil and gas sector and the more recent BC Hydro North Coast Transmission Line Project.

6.7.2 Summary of Engagement Activities

Surge has been engaging with the Witset since early 2026. Table 6.7-1 provides a summary of the key engagement activities with Witset.

TABLE 6.7-1 SUMMARY OF KEY ENGAGEMENT ACTIVITIES—WITSET FIRST NATION

First Nation	Key Activities
Witset First Nation	March 2026 Meeting request to Witset Chief and Council to introduce Surge to leadership and discuss the Project PFS results and Press Release. Requested an in-person meeting in April. Meeting in May with Chief and Council introduced the Project, the footprint and mine design. Key questions regarding environmental data and baseline as well as procurement, supply and employment opportunities were discussed.
	June 2026 Invitations sent out to leadership for a site visit in July. June 2026 preliminary discussion with Witset technical team on Tailings Alternatives and considerations, key interests surfaced regarding water resources. July 2026-August 2026 Ongoing discussions regarding capacity funding and agreement, tailings alternatives storage analysis, and field programs, at a high level. Further discussions to occur once capacity is landed for Witset. August 2026 site visit completed by several members of Council and president of the Youth Council.

6.7.3 Summary of Interests and Concerns

Table 6.7-2 provides a summary of key interests and concerns that have been presented to date by Witset. This list should not be considered exhaustive nor finalized. It is Surge's expectation that throughout the development process significant engagement will continue to occur and better define interests and concerns along with mitigation agreements that will look to address these interests.

TABLE 6.7-2 SUMMARY OF INTERESTS OR ISSUES RAISED BY WITSET FIRST NATION

Topic	Interest or Issues Raised	Surge Comments or Approach to the Interest or Issue
Environmental Baseline	Fisheries work and field program participation	Witset and Surge continue to discuss how to bring Witset knowledge and capacity into the Project field programs and field work. Surge looks forward to continued engagement.
Employment and Training	Interested in better understanding economic development opportunities with the Project	Surge is interested in better understanding the scope and scale of economic focus and capacity for the Kyah Development Corp for Witset and looks forward to ongoing engagement in this regard.
	Training for employment, both on-the-job and funded education and support	As the Project progresses, Surge is interested and engaged in better understanding what the educational aspirations are for Witset community members and how the company can support those aspirations in a meaningful way.
Tailings Alternatives	Witset indicated that protection of fisheries and water resources was an important consideration within the design criteria for the TWMF.	Surge is committed to protecting fisheries and water resources and is undertaking comprehensive fisheries, surface water, and hydrogeological baseline studies to identify, avoid, and manage potential effects on aquatic ecosystems and water quality and to inform the design of the tailings facility.

6.8 Wet'suwet'en First Nation

6.8.1 General Information and Location

The WFN (formerly known as Broman or Broman Lake Indian Band) is one of the five Band-governed Wet'suwet'en communities and is located near Burns Lake. Wet'suwet'en traditional territories span from approximately Burns Lake in the southeast to Witset in the north and westward to approximately the west end of the Tahtsa Reach approximately 30 km to the southwest of the Project resource area.

WFN has approximately 250 members and 11 reserve parcels totalling approximately 700 hectares. The majority of members reside at Palling No. 1 Reserve, located on the north shore of Decker Lake, between Burns Lake and Houston. This is also the location of their office and community centre.

The Nation has a democratically elected Council including a Chief and two Councillors, who are elected for three-year terms according to a Custom Election Code ratified by the community in 2017. The most recent elections were held in 2025.

The WFN's economic development arm, Yinka Dene Economic Development Limited Partnership (YLP), holds interests in projects and joint ventures.

6.8.2 Summary of Engagement Activities

Surge has been engaged with the WFN since 2013 surrounding discussions regarding engagement and associated agreements. Engagement has been significantly more active starting in 2021 encompassing First Nations Interests, economic development and procurement, supply and participation opportunities.

Surge has been working directly with YLP in the arrangement and participation in the assessment of Project components and development options for the Berg Copper Project building on prior engagement in 2024 involving feedback and discussions on possible power supply routing for the Project. This has culminated in the collaboration and submission of a funding request to NRCan in 2025 for a First Nation-led assessment of power supply options that would include a development pathway to investigate First Nation-owned infrastructure as part of the undertaking. The application to NRCan was conditionally approved in April 2026, and work is underway with YLP in reviewing Scope of Work proposals and developing Project timelines for the review of several options and alternatives for power supply to the Project. YLP as lead for the study will be engaging WFN and other Nations as the study advances.

Surge continues to work in partnership with YLP following a Collaboration and Cooperation Agreement that outlines information sharing and practices regarding the economic development and reconciliation between the Surge, YLP and WFN. In particular, Surge has worked with YLP to facilitate First Nation contracting opportunities for participation in Surge's exploration and

operations. In addition, Surge has endeavoured to use WFN associated businesses where possible and is currently doing so with several of the main contractors onsite completing exploration and baseline work.

Surge is currently operating within the February 2024 Collaboration and Cooperation Agreement with YLP and is actively engaging WFN in Capacity Funding Agreement discussions to support the regulatory and field-based work ahead.

Table 6.8-1 provides a summary of the key engagement activities with WFN.

TABLE 6.8-1 SUMMARY OF KEY ENGAGEMENT ACTIVITIES—WET'SUWET'EN FIRST NATION

First Nation	Key Activities
Wet'suwet'en First Nation	Initiate engagement in 2013, key learnings include understanding of Wet'suwet'en governance structure.
	Site visit to Surge resource sites including WFN members in August of 2013.
	Renewed engagement in 2021, focus surrounding First Nation participation in Project operations and understanding.
	Initiation of exploration agreement draft documentation in 2021.
	Various additional in person meetings, video conference calls and emails in 2021 surrounding engagement topics and YLP contracting interests.
	Various in video conference calls and emails regarding contractor opportunities for 2022 exploration programs.
	Support donation for 2022 Wet'suwet'en graduating students.
	2022 Surge Newsletter presented to Chief and Council for community presentation.
	>30 various engagement touch points across various mediums in 2023.
	March 2023 Surge presented updated exploration planning including contractor and employee opportunities. Request for Surge to reinitiate Communications Agreement discussions.
	June 2023 Surge presented updated information regarding Berg Copper Project and PEA design options.
	Summer 2023 Surge engages YLP owned Joint Venture as drilling contractor for season.
	September 2023 Surge presented information regarding planned power assessment including pathways for First Nation-owned infrastructure options.
	>110 engagement communications touch points in 2024 across various mediums in person meetings, call, video conference calls and emails.
	February 2024 Surge and YLP form official partnership for submission of funding application to complete First Nation-led power supply assessment. Denied by NRCan.
	February 2024 Signing of Collaboration and Cooperation Agreement including letter of support from WFN Chief and Council.
	May-November 2024 Discussions surrounding caribou management of various herds in the WFN traditional territory.

First Nation	Key Activities
Wet'suwet'en First Nation *(cont'd)*	Collaboration and initiation of 2024 summer field program in conjunction with several of WFN/YLP joint ventures for contracting entities.
	February 2025 Discussions surrounding partnerships and Project development planning.
	February-November 2025 Joint work with WFN on Critical Minerals Infrastructure Fund application and subsequent information requests.
	April 2025 Discussion surrounding Caribou Restoration and regional economic opportunities within resource development.
	April-May 2025 Discussion surrounding engagement on Berg permit amendment.
	May 2025 Mine Reclamation information discussion, provision of other BC examples of reclamation.
	September-October 2025 Discussion surrounding economic participation for YLP in the Berg operations and exploration programs.
	November 2025 Discussions on economic participation – provision of information on prospective bidders (including YLP and Joint Partners) that could aid on Berg PFS cost estimation.
	Late 2025 Surge and YLP as partners re-submit of funding application to complete First Nation-led power supply assessment.
	February 2026 Virtual meeting with WFN to provide Project update and next steps.
	February 2026 Surge advised WFN that the Project had been accepted into British Columbia's Critical Minerals Office, a designation intended to improve government coordination for priority critical mineral projects without changing regulatory or consultation requirements.
	March 2026 Surge forwarded employment needs to WFN for the upcoming field season.
	March 2026 Follow up on development agreement and capacity funding.
	June 2026 Meeting with WFN Chief Maureen & Councillor Sharon, legal counsel and natural resource consultant to present a high-level overview of the Project and discuss ongoing opportunities to work with WFN, beyond economic development interests. June-July 2026 Invitations sent out to leadership for a site visit in July. June-July 2026 Ongoing efforts to discuss agreement, capacity, field programs, tailings alternatives study and the broader assessment approach. July 2026 Site visit with Chief Maureen Luggi and councillor.

6.8.3 Summary of Interests and Concerns

As stated on the Nation's website, WFN is a dynamic, knowledgeable, unified community that will continue to progress toward self-sufficiency through mutual respect, strong leadership, and progressive and strategic activities that advance the social, economic, and cultural values of the community. The leadership by the YLP group to advocate for WFN in social and economic benefits is a strong example of this ethos.

As communicated to Surge, WFN community members place importance on participation in a consent-based process for the Project that honours the UN Declaration on the Rights of Indigenous Peoples. Encompassed within that principle is the path toward a fulsome reconciliation within social,

environmental, and economic aspects. The Berg Copper Project has the potential to impact the interests of WFN and early engagement throughout the Project assessment is key to WFN playing an active role. Surge will continue to engage and seek consent throughout the Project development.

A major interest of WFN is the inclusion in the development process and is highlighted in YLP's Diversity, Equity and Inclusion Pathways document. Important highlights of this document focus on:

- Respect and Mutual Benefit;
- Valuation of TK and Land use;
- Importance of genuine exchange throughout entire partnership leading to success;
- Early engagement to ensure a truly co-created Project;
- Identifying and co-designing of partnership services;
- Strengthening the interface between WFN, other Nations, and non-Indigenous communities; and
- Succession planning that is driven by Equity and Inclusion principles.

Economic and social development of the Wet'suwet'en people and communities has been highlighted as a specific interest of WFN. This topic would include social benefits such as employment and training over the long-term life of the Project and economic benefits that may stem from Joint Venture contracting opportunities, business development and economic participation in the Project.

Importantly, WFN has also indicated the importance of long-term mental health of the youth of their community. Surge and YLP have discussed the option and benefits of drug and alcohol-free cultural retreats that have proven very effective in ensuring that youth have a strong connection to their culture and past.

In addition to the above-mentioned interests and concerns, WFN has expressed the concern of long-term sustainability of traditional land uses across their territory and others. This concern includes ensuring the responsible development of the Project encompassing sufficient mitigation measures that safeguard the resources that WFN have traditionally stewarded and managed. Surge is committed to working with WFN and envisions significant continued engagement throughout all design, development, and operational aspects of the Project.

YLP and WFN have shown positive and progressive accomplishments in scientific fields for the responsible use and development of typical waste products from industrial processes. Two notable ventures that YLP has partnered with are the use of spent wood fibres for the production of a biodegradable packaging material and the study of using tailings material for carbon sequestration. It is intended that forward thinking and ideas like these will play an integral role in the assessment and potential development of the Project.

Table 6.8-2 provides a summary of key interests and concerns that have been presented to date by the WFN. It is not considered exhaustive nor finalized. It is Surge's expectation that throughout the development process significant engagement will continue to occur and better define interests and concerns along with mitigation agreements that will look to address these interests.

TABLE 6.8-2 SUMMARY OF INTERESTS OR ISSUES RAISED BY WET'SUWET'EN FIRST NATION

Topic	Interest or Issues Raised	Surge Comments or Approach to the Interest or Issue
Economic Reconciliation	Ensure access to joint venture operations run by YLP for use in Project operations.	Surge uses drilling contractors that provided economic participation to YLP through a MOU; Surge is interested in continued opportunities to support businesses that work in partnership with YLP.
	Ensure clear communications by all parties of needs, capacities, opportunities for contracting.	Surge annually provides what work programs are upcoming and scheduled for the field season. Surge is working in partnership on a YLP led assessment on infrastructure needs and options as it relates to the transmission line.
	Participation in the Project economics over the long-term basis.	Surge is interested in working with all local First Nations in advancing long term economic opportunities deriving from the Project.
	Opportunities for First Nation-owned businesses across all Project phases.	Surge is interested in working with all local First Nations in advancing long term economic opportunities deriving from the Project.
Employment and Training	Ensure professional development of community members.	Surge continues to engage with the community leadership to surface what professional development opportunities are being sought as it relates to the mine.
	Develop training for employment, both on-the-job and funded education and support.	As the Project progresses, Surge is interested and engaged in better understanding what the educational aspirations are for WFN members and how the company can support those aspirations in a meaningful way.
Assessment and Capacity Funding	Ensuring sufficient operational funds are available for YLP and WFN to actively participate in the Project development process.	Surge is interested in engaging further with WFN to define and sharpen the understanding of what capacity and resourcing is required to adequately participate in the Project development process.
Environmental Baseline	Ensure active participation of WFN in the collection and analysis of baseline data to develop the Project.	Surge is actively engaging with WFN to determine capacity, interest and training across a variety of field programs both in 2026 and building into subsequent years.
	Allow for oversight and personnel participation in the collection of field data.	See above.
Traditional Land Use	Ensure TK and cultural land use are incorporated in all assessment process alongside western science.	Surge is interested in understanding WFN's vision for how this can most effectively be coordinated and integrated (e.g. through the work underway with OW, or through another means).

Topic	Interest or Issues Raised	Surge Comments or Approach to the Interest or Issue
Traditional Land Use *(cont'd)*	Develop the Project in a way that minimizes effects on the environment and traditional land uses.	Surge is interested in early conversations with CCN and Wet'suwet'en on opportunities for focused restoration programs as identified in Scott McNay's Tactical Restoration Plan (2020) for the Tweedsmuir–Entiako Caribou herd. Additionally, seeking opportunities to minimize the Project footprint, use renewable energy to power the site infrastructure, and surface development approaches or benefits that can support traditional uses.
Consent-Based Approach	Develop the Project along with required assessments following an approach toward informed consent that takes into account WFN rights and title.	Surge is committed to transparent communication and seeking collaboration including free, prior informed consent to inform Project design and minimize Project impacts. Surge looks forward to continued discussions in this regard.

6.9 Skin Tyee First Nation

6.9.1 General Information and Location

The STFN was officially formed in 2000 when the nation split from NTB. The registered population of the STFN is 192 with 45 listed residents living on reserve. As stated on the website, the mission of the STFN is to identify and advance economic development ventures and initiatives, for and with, First Nation people of the Lakes District.

STFN has seven reserve lands encompassing approximately 411.9 ha located on the north end of Uncha lake or around the Southbank area south of Francois Lake. The closest reserve land to the Project is the Skin Tyee Reserve No. 15/16A/16B, located on the north side of the west end of Francios Lake, adjacent to the Morice FSR, which is 66 km from the Project. The Project lies within the stated traditional territory of Skin Tyee Band.

STFN has signed various agreements with the provincial government which include an Economic and Community Development agreement specifically related to the Huckleberry Mine signed in 2014, a Forest Consultation and Revenue Sharing Agreement most recently signed in 2023, and Natural Gas Pipeline benefits agreement signed in 2014.

6.9.2 Summary of Engagement Activities

Limited engagement has occurred to date with STFN despite a Protocol Agreement being signed between the nation and Surge in August 2014; setting out economic development opportunities, and common interests in engaging and working together. Throughout the years between 2014 and present, efforts have been made to contact or engage STFN, however, those efforts have oftentimes been unanswered; Surge understands this may be due to a lack of STFN capacity. Moreover, the governance dynamics and expectation to engage STFN directly outside of OW was not made clear until recently.

Since the start of 2026, Surge has endeavoured to engage STFN through a variety of efforts, meeting invites, capacity or resourcing agreements, and this engagement effort is summarized in Table 6.9-1. Surge had the opportunity to meet and engage with STFN Councillors and their broader technical team and management in April 2026 to present the Project PFS. During that meeting, it was viewed as an opportunity to reset the conversation with a new focus to the Project and the information of the Project's benefits, impacts and STFN's interests and overlapping asserted territory with the Project Area. This engagement was furthered during a site visit with Chief and Council and technical members in July 2026, which was well received and allowed a deepening of the relationship and understanding of STFN interests and land use within the Sibola Range area, as well as of Surge as a company, and the Project. STFN has indicated a capacity challenge which Surge is seeking to navigate and provide resourcing towards. It is expected that ongoing engagement and consultations will occur throughout the EA and development process where STFN will be provided with opportunities to learn about the Project and better define interests and concerns along with mitigation approaches that will look to address these interests.

Table 6.9-1 provides a summary of the key engagement activities with STFN.

TABLE 6.9-1 SUMMARY OF KEY ENGAGEMENT ACTIVITIES—SKIN TYEE FIRST NATION

First Nation	Key Activities
Skin Tyee	August 2014 Protocol Agreement summarized the intent of supporting respectful, engaged relationship building and to the level possible, bringing focused economic benefits to ST, or their economic partnerships through the exploration work/activities. December 2022 Annual newsletter from Surge. February 2026 Surge advised STFN that the Project had been accepted into British Columbia's Critical Minerals Office, a designation intended to improve government coordination for priority critical mineral projects without changing regulatory or consultation requirements.
	April 2026 Presentation of Surge's PFS on the Project to Skin Tyee Council and Management with a focus to a relationship reset to express the importance of the work ahead, the relevance of the Project Area to STFN interests, and next steps on capacity and a draft term sheet to support an agreement. June-July 2026 Invitations sent out to leadership for a site visit in July. July 2026 Site visit by STFN leadership (Hereditary Chief Ludooks, and Chief Samooh) as well as elected councillor, and key community and staff members.

6.9.3 Summary of Interests and Concerns

Table 6.9-2 provides a summary of key interests and concerns that have been presented to date by STFN. This list should not be considered exhaustive nor finalized. It is Surge's expectation that throughout the development process significant engagement will continue to occur and better define interests and concerns along with mitigation agreements that will look to address these interests.

TABLE 6.9-2 SUMMARY OF INTERESTS OR ISSUES RAISED BY SKIN TYEE FIRST NATION

Topic	Interest or Issues Raised	Surge Comments or Approach to the Interest or Issue
Assessment and Capacity Funding	Ensuring sufficient operational funds are available to actively participate in the Project development process.	Surge is interested in engaging further with STFN to define and sharpen the understanding of what capacity and resourcing is required to adequately participate in the Project development process.
Engagement Approach	Ensure direct engagement with STFN as the Project advances.	Surge is seeking direct engagement and the best approach to work with STFN to ensure the leadership and team is informed, engaged and supported through the Project development. Surge continues to be interested in determining that engagement pathway with STFN.
Environmental Baseline	Participation by STFN in the collection and analysis of baseline data to develop the Project is of interest.	Surge is committed to collaboration and transparent communication. As the Project field programs are designed and advanced the company is interested in surfacing opportunities and capacity for STFN participation.

6.10 Nee Tahi Buhn Indian Band

6.10.1 General Information and Location

Nee Tahi Buhn is the Wet'suwet'en name for Francois Lake, and means, "it fills at one end and empties at the other." Originally called the Francois Lake Band by the Federal Government, in 1960, the Francois Lake Band joined with Decker Lake, Maxim Lake and Skin Tyee Bands to form the Omineca Band. In 1984 the Omineca Band divided into Nee Tahi Buhn and Broman Lake Bands. The community is made up of on and off reserve members that are committed to preserving and promoting the traditional language, culture and way of life.

The nation continues to evolve and in 2000 the Skin Tyee Band and Nee Tahi Buhn separated to become independent Bands. NTB remains an independent Band not currently affiliated with tribal association or groups.

The NTB strives to cultivate a positive environment in which members of all ages can learn, grow and thrive. A great deal of importance is placed on the preservation of their culture and traditions that are deeply embedded in their language, arts and ceremonies. NTB further emphasizes the importance of language revitalization programs, organic farming initiatives, and local sustainable social enterprise projects as ways to continue to honour NTB's history and advance the nation into the future.

The reserve lands include five separate land areas covering 144 ha. all located within 10 km of the south shore of Francois Lake, the closest of which is approximately 80 km from the centre of the

Berg resource area. NTB is home to an ancient culture, a rugged history and a vibrant present. The Project lies within the stated traditional territory of NTB.

NTB has signed various agreements with the provincial government which include an Economic and Community Development agreement specifically related to the Huckleberry Mine signed in 2014, a Forest Consultation and Revenue Sharing Agreement most recently signed in 2024, and Natural Gas Pipeline benefits agreement signed in 2014.

6.10.2 Summary of Engagement Activities

Despite efforts to engage limited engagement has occurred to date with NTB throughout the early exploration years of the Project. Moreover, the governance and need to engage NTB distinctly and separate from OW was not made clear until recently.

Renewed focus to talk about the Project in early 2026, has provided Surge the opportunity to engage more directly with NTB Chief and Council as summarized in Table 6.10-1. Surge acknowledges continued opportunities for NTB and Surge to work together through the Project assessment and development lie ahead. In redefining the relationship with NTB, Surge briefed Chief and Council in April 2026 on of the Project PFS context and heard early concerns from NTB including opportunities for employment, fisheries values and water impacts within the Project Area. This engagement was furthered during a site visit with Chief and Council and technical members in August 2026, which was very well received and allowed a deepening of the relationship and understanding of Surge as a company, and the Project. It is expected that ongoing engagement and consultations will occur throughout the EA and development process where NTB will be provided opportunities to learn about the Project and better define interests and concerns along with mitigation agreements that will look to address these interests.

Table 6.10-1 provides a summary of the key engagement activities with NTB.

TABLE 6.10-1 SUMMARY OF KEY ENGAGEMENT ACTIVITIES—NEE TAHI BUHN INDIAN BAND

First Nation	Key Activities
Nee Tahi Buhn	February 2026 Surge advised NTB that the Project had been accepted into BC's Critical Minerals Office, a designation intended to improve government coordination for priority critical mineral projects without changing regulatory or consultation requirements.
	April 2026 Presentation of Surge's PFS on the Project to Chief and Council and heard early perspectives on the Project, including interest in economic opportunities, the need for a capacity agreement, and concerns regarding fisheries or water impacts from the Project. April 2026 A draft term sheet to help frame the engagement capacity and resources, alongside deliverables was provided to NTB for consideration. July 2026 NTB engaged in discussions on the environmental field program to solicit interest in monitors joining the program. July 2026 NTB Chief and Council in site visit for a comprehensive site tour, and opportunity to engage directly with executive management on the Project impacts and interests.

6.10.3 Summary of Interests and Concerns

Table 6.10-2 provides a summary of key interests and concerns that have been presented to date by NTB. This list should not be considered exhaustive nor finalized. It is Surge's expectation that throughout the development process significant engagement will continue to occur and better define interests and concerns along with mitigation agreements that will look to address these interests.

TABLE 6.10-2 SUMMARY OF INTERESTS OR ISSUES RAISED BY NEE TAHI BUHN INDIAN BAND

Topic	Interest or Issues Raised	Surge Comments or Approach to the Interest or Issue
Environmental Baseline	Ensure robust data collection for fisheries and fish habitat assessment and field work.	Surge continues to engage with NTB on opportunities to inform the field programs and engage in the field work both this year and in subsequent years.
	Ensure robust understanding of water use, water movement and volume across the site; as droughts within the area impact water availability for processing/plant operations.	Surge is committed to ongoing engagement on the field program and work underway to understand and support and integrated water balance model for the site. Surge looks forward to ongoing discussions with NTB on opportunities to review water source, use, and hydrometric information across the site in consideration of future use and management.

6.11 Cheslatta Carrier Nation

6.11.1 General Information and Location

Prior to 1952, the people of the CCN lived for centuries on the shores of Cheslatta and Murray Lakes. They enjoyed a peaceful, self-sustaining existence. Through the centuries, the Cheslatta people developed a complex system of roads, trails and paths connecting their small villages to the communities of Grassy Plains, Fraser Lake and Vanderhoof. The Project is located within the asserted traditional territories of the CCN.

An important event in the history of the CCN occurred in 1952, when the Kenney Dam was completed, flooding the Nechako River, Cheslatta Lake, Ootsa River, Tetachuk River and Tahtsa River, forcing the Nation to move from their homelands and forever changing their way of life.

Today, CCN 's offices are based in Southbank, which is located on the south shore of Francois Lake, 23 km south of Burns Lake. Reserve land of CCN is made up of 17 Reserves, encompassing 1,402.8 ha, scattered over a vast area known as the "Southside." The CCN reserve lands vary in distance from the centre of the Project from 114 km to Southbank and 162 km to the Targe Creek 15 reserve. Many of the Nation's 383 registered members reside across Southside and in the various reserve lands. Others have moved away from their traditional lands living across BC, Canada, or elsewhere.

The nation is guided by its members and governed by a Chief and two Councillors. Current Chief Janet Whitford works with Councillors Hazel Burt and Teddy Jack, and Cheslatta staff to provide services and support to Cheslatta members. The CCN is known as a strong, industrious group from previous work with governments and industry on matters of importance to the nation.

The CCN has a number of agreements with the Province of BC including a Reconciliation and Settlement Agreement amended in 2021 with shared aspects of co-management on the lands, an Economic and Community Development Agreement specifically related to the Huckleberry Mine signed in 2014, a Forest Consultation and Revenue Sharing Agreement most recently signed in 2024 and a Land Transfer Agreement signed in 2023. The CCN is in discussions with BC regarding Treaty Negotiations.

On February 27, 2020, a historic agreement was signed between CCN and Rio Tinto Alcan leading to a new relationship focused on partnerships and inclusion. It is the intent of Surge to follow the spirit and intent of these agreements in its consultative, engagement and working relationship with CCN through all stages of the Surge's involvement on the land.

6.11.2 Summary of Engagement Activities

Surge has been engaged with the CCN since 2005. This included site visits to the Ootsa project during the summer exploration seasons in each of 2005, 2006 and 2007 including use of helicopter for aerial tours and inclusion of company board members and Chief and Council from CCN.

Engagement continued through 2010 to the culmination of which resulted in the signing of a Letter of Understanding between Surge and CCN that formalized communications and provided for capacity funding where required. The Letter of Understanding also highlighted the mutual understanding and interest to develop mineral properties in the region under the premise of socioeconomic benefits are received by each party.

Engagement continued on a regular basis through 2010, 2011 and 2012 between company and CCN personnel through emails and conversations both in person and over the phone to provide updates on company development and operations. Various CCN members were employed by Surge across numerous exploration seasons during this time.

Surge and CCN amended the Letter of Understanding to adequately acknowledge Indigenous rights of the CCN and provide greater clarity on employment and communications for Surge's operations. This amended agreement was accompanied by a letter of support from the Chief and Council of the time for the Project development. The CCN and Surge have been working within this Letter of Understanding in good standing since its signing in 2013.

Engagement was active and continued from 2015 through 2021 with various updates and communications surrounding the 2016 Ootsa PEA document and ensuring CCN representation in Surge's workforce.

Engagement in 2022 and 2023 including discussions for the permit amendments to exploration permits for both the Berg and Ootsa properties and general operational updates from Surge. Engagement was also given to provide a summary of the 2023 Berg PEA with plain language presentations provided for community distribution as required.

As part of the exploration permit renewal process Surge actively worked with CCN personnel and experts along with consultancy services associated with the Nation to create and update the caribou management plans for the Ootsa and Berg properties. The CCN input, TK and land use was imperative to ensure high-quality management plans are in place at Surge's Project Areas. Engaging CCN and other Nations in caribou planning and strategy discussions for future management planning related to caribou and other valued components (VCs) is underway.

Engagement in 2024 also included feedback and discussions surrounding possible power supply routing for the Berg Copper Project. Several options and alternatives are available for power supply to the Project and the CCN has been a significant aid in the planning process to assess those options that are now under consideration through the alternatives assessment work with YLP and WFN.

Engagement since 2024 has focused on Project economic opportunities, contracting and joint ventures held by CCN with local contractors. Surge has ensured that these factors have helped guide decisions regarding procurement, supply and contractors to the site as the exploration work advanced, and in readiness for the technical and environmental baseline work required. Since 2026, Surge has focused discussions on three streams: ongoing contracting/procurement with CCN-partnered vendors; powerline and supply options including engagement in the study; and the Project-specific details and PFS. Surge has received CCN support for the Project, and CCN is considered by Surge as an important partner in the Project who has engaged fulsomely to date and guided Surge in thoughtful approaches to contracting and supply relationships to ensure the community derives economic benefits from the Project as Surge continues to advance it.

Table 6.11-1 provides a summary of the key engagement activities with CCN.

TABLE 6.11-1 SUMMARY OF KEY ENGAGEMENT ACTIVITIES—CHESLATTA CARRIER NATION

First Nation	Key Activities
Cheslatta Carrier Nation	2005 Initiation of Engagement with CCN.
	2005 Chief and Council site visit to Ootsa properties with helicopter flyover of property.
	Additional site visits in 2006 and 2007.
	Signing of Letter of Understanding accompanied with Letter of Support for company activities in 2010.
	Site visits in 2010 and 2011.
	Amended Letter of Understanding signed in 2013.
	2015-2020 Included various meetings and discussions surrounding Project and company activities.
	2020 Providing updated planning for the Berg option newly acquired by Surge.

First Nation	Key Activities
Cheslatta Carrier Nation *(cont'd)*	Various calls, emails and meetings throughout 2022 to provide updates on company activities, planning and employment of CCN personnel and community members.
	2023 Engagement of CCN and associated businesses in support of Ootsa permitting efforts and caribou management planning.
	2024 Discussions regarding power supply planning and routing options for Berg Copper Project. Expressed interest in funding application and participation in study.
	Numerous discussions throughout 2024 regarding caribou management within CCNs traditional territory specifically noting balanced approach is needed to ensure responsible economic development can continue.
	September 2024 Online video conference call with Chief, Council and CCN personnel to discuss Surge Update and Activities within CCN traditional territory. Discussion surrounding options and planning for Indigenous-led assessments.
	Various contact points in drafting IPD including request and use of land use plans for IPD development information.
	February 2026 Surge advised CCN that the Project had been accepted into British Columbia's Critical Minerals Office, a designation intended to improve government coordination for priority critical mineral projects without changing regulatory or consultation requirements. CCN representatives welcomed the news, congratulated Surge, and confirmed their intent to continue engaging on the Project as it advances.
	March 2026 Discussion around capacity funding from Surge to support legal review, internal coordination, and participation in discussions related to the draft development agreement and engagement budget for the Project.
	March 2026 Surge shared employment ad with CCN and offered to coordinate CCN members working at site.
	April 2026 Presentation of Surge's PFS on the Project to Chief and Council, discussed the opportunities for the Project, reviewed the Project in relation to CCN's stated traditional territory, talked about the use of CCN's archives, and the chance to continue to derive economic opportunities through partnerships and Surge's efforts at procurement. July 2026 Engagement on preliminary design considerations and siting criteria for tailings facility to support the alternatives assessment for tailings.
	June-July 2026 Invitations sent out to leadership for a site visit in July.

6.11.3 Summary of Interests and Concerns

Consistently the CCN has discussed interests in the responsible development of the Project with reference to the nature and dependence on the environment for their way life. In particular, the CCN plays a very important role in the management of forests within their traditional lands for both harvest limits and fire control. The CCN has a team of personnel that aid in the fighting of wildfires during the summer season and are constantly aware of the dangers that this threat poses.

Fish and fish habitat are of particular concern for CCN and specifically related to the long-term effects of the damming of the Nechako River. The CCN are leading a study of Umam that are no longer found in the Nechako reservoir following the Kenny Dam construction. The CCN also plays a part in the Kenny Dam Water Release Facility that will "re-water" the upper stretch of the Nechako River.

Large ungulates such as Moose and caribou play a large part of the CCN's way of life and culture. Efforts by the CCN in partnership with the BC government are being made to increase caribou populations in the CCN traditional territory. Ongoing effects of the Kenny Dam on caribou are well document as logging was never completed prior to flooding. This left shorelines with significant quantities of dead standing trees left above and below the water level at or near to the shore. These hazards impact access to calving islands, food sources, and predator evasion for caribou. The CCN has been active in clearing deadwood from the shore since at least 1996 to minimize these impacts, as well as attempts at logging the submerged trees, and gathering woody debris from the shores.

Additionally, the CCN has a strong commitment to ensure their rights and title are adhered to for lands within their traditional territory. This would include the incorporation of Traditional Knowledge and participation in the EA process and specifically inclusion of the CCN within that process. The CCN has been open minded and progressive in the matter of collaboration with Wet'suwet'en for the purposes of effective development of the Project through the assessment process. This includes the suggested contributions of the Major Projects Coalition which as a national non-profit organization established by First Nations for First Nations would be in a position to provide access to tools, knowledge, and advice used to make free, prior, and informed business decisions about First Nation involvement and participation the Project.

In addition to the environmental and title concerns listed above, CCN has indicated the economic participation of the nation on the Project is greatly appreciated and viewed as an effort to broaden reconciliation progress with the nation. Surge has used the significant expertise, knowledge and personnel from CCN to support the development of the Project to this stage and looks to continue this pathway as the Project advances.

Table 6.11-2 provides a summary of key interests and concerns that have been presented to date by the CCN. This list should not be considered exhaustive nor finalized. It is Surge's expectation that throughout the development process significant engagement will continue to occur and better define interests and concerns along with mitigation agreements that will look to address these interests.

TABLE 6.11-2 SUMMARY OF INTERESTS OR ISSUES RAISED BY CHESLATTA CARRIER NATION

Topic	Interest or Issues Raised	Surge Comments or Approach to the Interest or Issue
Traditional Land Use	Using the lands for a variety of different purposes, including the harvest of caribou for both diet and clothing.	Surge is interested in early conversations with CCN and Wet'suwet'en on opportunities for focused restoration programs as identified in the Tactical Restoration Plan (2020) for the Tweedsmuir–Entiako Caribou herd.
	Develop the Project in a way that minimizes effects on the environment and traditional land uses.	Above comments regarding restoration opportunities, while also seeking opportunities to minimize the Project footprint, use renewable energy to power the site infrastructure, and surface development approaches or benefits that can support traditional uses.

Topic	Interest or Issues Raised	Surge Comments or Approach to the Interest or Issue
Employment and Training	Ensure Opportunities are available for CCN members.	Surge has consistently solicited employment, partnership and procurement opportunities that support local First Nations communities and has a deep relationship with CCN on the economic, employment, and training interests of the nation in alignment with the Project.
	Use of Cheslatta Knowledge and expertise throughout the Project development process.	See above comments.
Economic Opportunities and Reconciliation	Ensure economic opportunities and participation in Project benefits are seen by the CCN.	Surge has engaged CCN contracting to support road clearing, maintenance and repairs as one example.
	Ensure clear communications by all parties of needs, capacities, opportunities for contracting.	Surge continues to solicit opportunities for early engagement.
	Participation in the Project economics over the long term.	Surge donated a bulldozer to CCN to support not only Project-specific development and economic activities, but to similarly support future economic opportunities for CCN. Surge is interested in working with all local First Nations in advancing long term economic opportunities deriving from the Project.
	Opportunities for First Nation-owned businesses across all Project phases.	See above.
Assessment and Capacity Funding	Ensuring sufficient operational funds are available for the CCN to actively participate in the Project development process.	Surge is interested in engaging further with CCN to define and sharpen the understanding of what capacity and resourcing is required to adequately participate in the Project development process.
Environmental Baseline	Ensure use of significant in-house expertise within CCN staff and community.	Surge is actively engaging with local First Nations' teams to determine capacity, interest and training across a variety of field programs both in 2026 and building into subsequent years. Surge is engaging with CCN to establish the model and method by with archives and historical information can be used to inform the Project's design.
	Use of joint venture partners for collection of baseline data where possible.	See above, as well as continuing to expand awareness and knowledge of joint venture partnerships with local businesses.
Consent-Based approach	Develop the Project along with required assessments following an approach toward informed consent that considers CCN rights and title.	Surge is committed to transparent communication and seeking collaboration including free, prior informed consent to inform Project design and minimize Project impacts. Surge looks forward to continued discussions in this regard.
	Potential for assistance of the Major Projects Coalition in the advancement of the EA and First Nation Assessment.	Surge is interested in better understanding the toolkits and approach of the First Nations Major Projects Coalition role, approach and opportunities and looks forward to future discussions on this topic.

6.12 Summary of First Nation Engagement

Engagement with potentially affected First Nation groups is ongoing and has informed Project planning, environmental studies, baseline programs, and the identification of issues requiring further assessment. Key themes raised during engagement to date include protection of water resources, fish and fish habitat, traditional harvesting, wildlife stewardship, Indigenous rights and title, cultural continuity, participation in environmental monitoring, capacity funding, employment, training, procurement opportunities, and the application of seeking consent-based approaches to Project development.

Additional engagement, Traditional Knowledge studies, and Nation-led assessment processes are ongoing and will continue to inform the assessment of Project effects, mitigation measures, monitoring programs, and Project decision-making. Surge has shared Project information with all First Nations throughout the planning process to gather feedback and support the development of Project planning documents and regulatory submissions, including this IPD and Engagement Plan. Table 6.12-1 provides a summary of engagement activities to date with each participating First Nation group.

TABLE 6.12-1 SUMMARY OF FIRST NATION ENGAGEMENT

First Nation	Summary of Engagement to Date	Key Issues Raised to Date
OW / Wet'suwet'en Hereditary Chiefs	Ongoing engagement with OW since 2013 through a CEA (updated in 2024), technical meetings, workshops, All Chiefs meetings, site visits, house scoping sessions, and OW participation in fisheries, vegetation, and wildlife field programs, which have contributed to Project planning. In 2026, a Capacity Funding Agreement was executed to support an OW-led assessment process, which is currently underway and includes ongoing technical information exchange between OW and the Project team.	Watershed health; salmon, fisheries, and aquatic resources; traditional harvesting and cultural land use; stewardship responsibilities and environmental protection; rights and title; consent-based approaches; environmental baseline studies, monitoring, and Indigenous participation in field programs; capacity funding and participation in the assessment process; employment, training, economic reconciliation, and long-term economic participation.
Witset First Nation	Engagement with Witset commenced in 2026 and has included meetings with Chief and Council, Project presentations, discussions regarding environmental baseline studies, capacity support, economic development opportunities, and invitations to participate in site visits. Initial engagement has focused on sharing Project information and identifying Witset's interests related to environmental participation, fisheries, employment, training, and economic development, with ongoing discussions planned as the Project advances through the EA process.	Fisheries and aquatic resources; environmental baseline studies and Indigenous participation in field programs; employment, training, and economic development opportunities.

First Nation	Summary of Engagement to Date	Key Issues Raised to Date
Wet'suwet'en First Nation (WFN)	Engagement with WFN has been ongoing since 2013, with increased engagement since 2021 through leadership meetings, technical discussions, site visits, and collaboration with Yinka Dene Economic Development LP. A Collaboration and Cooperation Agreement was signed in 2024, and ongoing engagement includes discussions related to power supply studies, economic participation opportunities, and participation of WFN-affiliated businesses in Project-related activities.	Watershed health; salmon, fisheries, and aquatic resources; traditional harvesting and cultural land use; environmental stewardship; rights and title; consent-based approaches; environmental baseline studies, monitoring, and Indigenous participation in EA; capacity funding; employment, training, and economic participation.
Skin Tyee First Nation (STFN)	A Protocol Agreement was signed with STFN in 2014. Engagement activities were limited in subsequent years. Engagement was renewed in 2026 through meetings with leadership, Project presentations, and site visits. Discussions to re-establish the relationship are underway, including consideration of community capacity needs and opportunities for participation in baseline studies, field programs, and ongoing Project engagement activities.	Capacity funding and operational resources to support meaningful participation in the Project development process; direct Nation-to-Proponent engagement as the Project advances; participation in environmental baseline studies and field programs; involvement in the collection and analysis of baseline information; and ongoing opportunities to review Project information and participate in the assessment process
Nee Tahi Buhn First Nation (NTB)	Engagement with NTB commenced in 2026 and has included meetings with Chief and Council, Project presentations, discussions regarding environmental field programs, and participation in site visits. Through early engagement, fisheries, water quality, water quantity, and water management were identified as key interests, and discussions are ongoing regarding participation in environmental studies, capacity support, and review of Project-related information throughout the EA process.	Fisheries and fish habitat; water quantity, water use, and water management; environmental baseline studies and participation in environmental field programs.
Cheslatta Carrier Nation (CCN)	Engagement with CCN has been ongoing since 2005 and has included meetings, site visits, technical discussions, environmental planning activities, procurement and contracting discussions, and implementation of a long-standing Letter of Understanding. Through this engagement, CCN has provided input on caribou management, power supply planning, environmental studies, traditional land use, and economic participation opportunities, contributing to Project planning and the identification of key interests related to fisheries, wildlife, environmental stewardship, rights and title, and long-term community benefits.	Traditional land use and harvesting, including wildlife resources; environmental stewardship and protection of traditional land uses; rights and title; consent-based approaches; environmental baseline studies and Indigenous participation in the assessment process; use of Traditional Knowledge and expertise; capacity funding; employment, training, economic participation, and Indigenous business opportunities.

6.13 Planned First Nation Engagement

Surge is committed to the continued and ongoing engagement with First Nations and communities that may potentially be affected by the Project. Surge has integrated the EAO's requirements for the Engagement Plan requirements directly into this IPD (Appendix A provides a concordance identifying where each requirement has been addressed). Engagement will include continued discussions regarding Project components and associated infrastructure, including the proposed transmission line, transportation corridors, and transportation options, to understand potential interactions with Indigenous interests, rights, land and resource use activities, culturally important areas, stewardship priorities, and community values, and to inform Project planning, alternatives evaluation, effects assessment, and mitigation development.

The ongoing engagement has the objective of ensuring that both the First Nations and Surge have an opportunity to:

- Fully understand the process, objectives, logistics, and outcomes of the EA process;
- Provide sufficient opportunity for learning and sharing of information regarding culture and potential effects of the Project with sufficient time to implement design or process changes respectively;
- Ensure sufficient scope, timing, and capacity is available to all parties for collaboration and review during the assessment process;
- Document and track potential concerns, questions, or issues throughout the EA process;
- Provide a forum and methodology to the provision of technical information to First Nations and communities in easy-to-understand formats; and
- Identify and incorporate effective mitigations and accommodations to concerns that may arise.

Through ongoing engagement, Surge will work collaboratively with potentially affected First Nations to identify and understand Nation-specific interests, concerns, priorities, rights, land and resource use activities, and Project interactions. As information becomes available through engagement, technical studies, Traditional Knowledge programs, and other collaborative processes, Surge will incorporate this information into Project planning and the effects assessment and clearly identify which potential effects may apply to each participating First Nation. This will include consideration of Indigenous land and resource use areas that overlap with or are located near Project components and infrastructure; potential effects on harvesting activities, travel routes, sites of cultural importance, traditional land and resource use, governance and stewardship activities, and Nation-led land and resource management priorities; community health, well-being, and socio-economic conditions, including factors that may influence the way Indigenous communities experience Project-related effects or benefits; potential effects on cultural continuity, intergenerational knowledge transfer, community well-being, and culturally, socially, or economically important species, resources, and

areas; and opportunities for First Nations participation in Project planning, mitigation development, monitoring, follow-up programs, Traditional Knowledge integration, and collaborative decision-making processes throughout the assessment and Project development process.

Through engagement with First Nations, including input received during the development of this IPD and Engagement Plan, and ongoing discussions with OW and other Wet'suwete'en Nation people on the constructs of the OW-led Project Assessment, Surge will seek to understand and document Traditional Knowledge, cultural values, land use information, and community perspectives relevant to the Project, and will consider this information in Project planning, alternatives planning, effects assessment, mitigation development, monitoring, and the preparation of the DPD, consistent with the protocols, permissions, and preferences of participating First Nations. The planned engagement for each participating First Nation will continue as summarized in Table 6.13-1, though this is subject to change based on the evolving relationships with the nations.

TABLE 6.13-1 PLANNED FIRST NATION ENGAGEMENT

First Nation	Planned Engagement during Early Engagement and DPD Development
Office of the Wet'suwet'en (OW) / Wet'suwet'en Hereditary Chiefs	Surge will continue monthly coordination meetings with the OW and support the ongoing OW-led assessment process, including house-based engagement activities with Yextsowiten (Thin House) members. Engagement is expected to include technical workshops, participation in field programs, site visits, sharing of data and study results, review of draft regulatory (e.g., IPD/DPD) materials, and ongoing discussions regarding potential effects, mitigation measures, accommodation measures, and opportunities for Traditional Knowledge integration. Capacity funding will continue to support participation and review activities. Project information, maps, visualizations, and technical materials will be provided in advance of key milestones wherever practicable.
Witset First Nation	Surge will continue engagement with Witset through quarterly meetings with Chief and Council, and more frequent engagement on technical workshops, and ongoing correspondence. Engagement is expected to focus on fisheries, environmental baseline programs, cultural values, employment and training opportunities, and review of draft regulatory (e.g. IPD/DPD) materials. Opportunities to participate in field programs, site visits, and meetings will be provided. Capacity funding discussions will continue to support participation in the assessment process.
Wet'suwet'en First Nation (WFN)	Surge will continue engagement with WFN through quarterly meetings with Chief and Council, YLP, with more frequent engagement with technical representatives and through workshops, supplemented by Project updates, technical workshops, site visits, and ongoing correspondence. WFN will be provided opportunities to review draft regulatory (e.g. IPD/DPD) materials, study results, mitigation measures, and monitoring approaches. Discussions regarding Traditional Knowledge, traditional land use, employment, training, procurement, and economic participation opportunities will continue throughout the EA process. Capacity funding and issue tracking will be maintained to support meaningful participation.
Skin Tyee First Nation (STFN)	Surge will continue direct engagement with STFN through quarterly meetings with Chief and Council, Chief Samooh and Chief Ludooks and regular information sharing regarding Project studies, design refinements, and EA activities. Engagement will include opportunities to participate in baseline studies, review draft regulatory (e.g. IPD/DPD) materials, discuss Traditional Knowledge and community interests, and identify potential mitigation measures. Capacity funding discussions will continue with a goal to support participation and review of technical information throughout the assessment process.

First Nation	Planned Engagement during Early Engagement and DPD Development
Nee Tahi Buhn First Nation (NTB)	Surge will continue engagement with NTB through quarterly meetings with Chief and Council, and technical meetings, supplemented by focused discussions regarding fisheries, wildlife, water use, hydrology, and environmental monitoring. NTB will be provided opportunities to review draft regulatory (e.g. IPD/DPD), technical studies, mitigation measures, and monitoring approaches. Participation in field programs, site visits, and technical workshops will be offered where appropriate. Capacity funding discussions will continue to support meaningful participation throughout the assessment process.
Cheslatta Carrier Nation (CCN)	Surge will continue engagement with CCN through quarterly meetings with leadership and technical staff, together with ongoing discussions regarding fisheries, watershed health, caribou, moose, traditional land use, environmental stewardship, and economic participation opportunities. CCN will be invited to participate in technical workshops, field programs, site visits, and review of draft DPD materials. Engagement will also include discussion of mitigation measures, monitoring programs, and opportunities for Traditional Knowledge integration. Capacity funding and issue tracking will continue to support meaningful participation throughout the EA process.

Overall, engagement will aim to share timely information with First Nations required for review, understanding, collaboration and participation. These approaches include, but are not limited to:

- In-person discussions and update meetings;
- Capacity funding for external review of EA documentation and technical information;
- Capacity funding for negotiation support;
- Community Open Houses;
- Working group meetings and workshops;
- Phone calls, online video conferencing, and email correspondence;
- Tours and Site Visits;
- Presentations including technical information; and
- Provision of draft documentation and formal submissions in advance of submission wherever possible.

Communications materials may include:

- Data sharing;
- Newsletters;
- Images and 3D depictions of Project infrastructure;
- 3D digital flyover videos or 3D models of Project for spatial review;
- Presentations;

- Maps and Figures;
- Google Earth data and third-party mapping services; and
- Standard digital document formats such as Word, Excel, and/or PDF.

As part of Surge's ongoing engagement, activities and communications will be tracked, including agreed-upon minutes of conversations for presentation and summary through the EA process. This will also include the tracking and conclusion of comments, questions and concerns throughout the EA.

7. Local Governments, Government Agencies, Stakeholders, and the Public

Surge's engagement approach is based on building respectful, transparent, and collaborative relationships with First Nations, local communities, governments, regulatory agencies, stakeholders, and the public throughout the Project lifecycle. Engagement began during the early exploration stages and has continued through Project planning and development. Through long-standing relationships with Wet'suwet'en and CCN, as well as ongoing engagement with local governments, provincial and federal agencies, community organizations, land users, and other interested parties, Surge has developed a broad understanding of the social, cultural, environmental, and economic interests associated with the Project.

Surge views engagement as an ongoing process that supports meaningful participation and informed decision-making. The approach emphasizes early involvement, open communication, respect for Indigenous rights and cultural values, and consideration of community and stakeholder feedback in Project planning and development. Information about Project activities, engagement opportunities, and key milestones will be shared in a timely and consistent manner using communication methods appropriate to different audiences. The Engagement Plan will be reviewed and updated as the Project advances, new information becomes available, feedback is received, or additional participants are identified. Updates to the Engagement Plan will be communicated through established engagement channels to keep participants informed and support continued involvement throughout the EA process.

7.1 Local Governments

7.1.1 Overview

The Project falls within the Regional District of Bulkley-Nechako and is in relatively close proximity to three communities that may serve as service centres and employee home bases.

Table 7.1-1 provides a summary of the primary local governments identified for engagement.

TABLE 7.1-1 IDENTIFIED LOCAL GOVERNMENTS

Organization	Key Elected Officials	Key Departments / Staff	Why Engage
Regional District of Bulkley-Nechako (RDBN)	Board Chair; Electoral Area Directors; Directors representing Smithers, Houston, Burns Lake, Vanderhoof, and Fort St. James.	Planning and Development Department (Director of Planning and Development: Jason Llewellyn); Economic Development Department; Emergency Management / Protective Services; Parks & Recreation; Agricultural Services; Chief Administrative Officer (CAO).	Regional planning matters, land use compatibility, road and infrastructure issues, emergency preparedness, economic benefits, housing, workforce, and regional concerns.
Town of Smithers	Mayor Gladys Atrill and Council.	Community Planning; Economic Development; Building and Development Services; Engineering and Infrastructure; Fire and Protective Services; CAO.	Community impacts, housing pressures, workforce accommodation, transportation, economic opportunities, emergency planning, and Project updates.
District of Houston	Mayor Shane Brienen and Council.	Development Services / Planning; Economic Development; Public Works; Fire Department; CAO. Houston's Strategic Plan identifies economic development, diversification, community sustainability, and Indigenous reconciliation as priorities.	Mining employment opportunities, local contracting, road use, housing, community infrastructure, and Indigenous-community partnerships.
Village of Burns Lake	Mayor Henry Wiebe and Council.	Development Services; Economic Development; Public Works; Fire and Emergency Services; Recreation and Community Services; CAO (currently Sheryl Worthing).	Potential socio-economic effects, local business opportunities, workforce attraction, infrastructure, emergency management, and long-term community development.
Village of Fraser Lake	Mayor Sarrah Storey and Council.	CAO, Planning / Development Services; Public Works / Infrastructure; Economic Development; Emergency/Protective Services; Recreation, Community Services.	Potential socio-economic effects, local business opportunities, workforce attraction, infrastructure, emergency management, and long-term community development.

Regional District of Bulkley-Nechako

The Regional District of Bulkley-Nechako (RDBN) is one of British Columbia's largest regional districts, covering more than 73,000 km^2 across north-central BC and encompassing the Bulkley Valley, Lakes District, Nechako Valley, and parts of the Omineca region. The region had a population of approximately 37,700 residents in 2021, with its largest communities being Smithers, Vanderhoof, Houston, Burns Lake, Fort St. James, Telkwa, and Fraser Lake. The region is also home to numerous First Nations, including Wet'suwet'en, Lake Babine Nation, Nak'azdli Whut'en, Saik'uz First Nation, and several other Carrier (Dakelh) and Sekani Nations.

The RDBN's economy is strongly rooted in forestry, mining, agriculture, tourism, and transportation. Forestry and wood products remain major employers, while the region supports a growing mining sector with numerous active and proposed mineral exploration and development projects. Agriculture is concentrated around Vanderhoof and the Nechako Valley, particularly cattle ranching and forage production. The region also offers significant recreational and tourism opportunities associated with destinations such as Babine Lake, Stuart Lake, Francois Lake, Hudson Bay Mountain, Tweedsmuir Provincial Park, and Fort St. James National Historic Site. Strategic transportation infrastructure, including Highway 16, the Canadian National (CN) Rail mainline, regional airports, and access to the Port of Prince Rupert, positions the RDBN as a key resource development and trade corridor in northern British Columbia.

District of Houston

The District of Houston is located in the Bulkley Valley along Highway 16, approximately 60 km west of Burns Lake and 55 km east of Smithers. Houston had a population of approximately 3,052 residents in 2021 and serves as an important service and employment centre for surrounding rural communities and Indigenous Nations. Originally established as a farming community, Houston has evolved into a regional industrial centre while maintaining strong agricultural roots. The community is situated within the traditional territory of the Wet'suwet'en people and offers excellent access to fishing, hunting, hiking, snowmobiling, and other outdoor recreation opportunities.

Houston's economy is primarily driven by forestry, wood processing, mining support services, agriculture, and tourism. The community is well known as the "Steelhead Capital of Canada" due to its proximity to the world-renowned Morice River steelhead fishery and is home to the world's largest fly-fishing rod. Major employers include forestry and manufacturing operations, while the community also supports mineral exploration activities throughout northwestern BC. Located on both the CN Rail mainline and Highway 16 corridor, Houston provides strategic transportation access to Prince Rupert, central BC, and major resource development projects throughout the region.

Village of Burns Lake

The Village of Burns Lake is located in the heart of BC's Lakes District and serves as the administrative centre of the RDBN. The village had a population of approximately 1,659 residents in 2021 and functions as the primary commercial and service hub for numerous surrounding rural communities, lakeshore developments, and First Nations. Burns Lake is situated on Highway 16 between Smithers and Vanderhoof and is surrounded by extensive forests, lakes, and recreation opportunities. The community has a strong Indigenous presence and is closely connected with Lake Babine Nation, WFN, STFN, NTB, CCN, and Ts'il Kaz Koh First Nation (Burns Lake Band).

The local economy is anchored by forestry, mining, tourism, government services, and transportation, with Burns Lake serving as a regional centre for commerce and healthcare. The community is recognized for its extensive network of lakes, outdoor recreation, and mountain biking trails, including Canada's first International Mountain Bicycling Association Ride Centre designation. Burns Lake also acts as an important service centre for resource industries operating throughout the Lakes District and northern interior, while its location on Highway 16 and the CN Rail corridor supports regional trade and mobility.

Town of Smithers

The Town of Smithers is the largest urban centre in the Bulkley Valley and one of northern BC's most important regional service hubs. Located at the base of Hudson Bay Mountain, Smithers had a population of approximately 5,378 residents in 2021 and serves a much larger regional population throughout northwestern BC. Known for its attractive mountain setting, vibrant downtown, and strong community amenities, Smithers functions as a centre for healthcare, education, professional services, transportation, and government administration. The town lies within the traditional territory of the Wet'suwet'en Nation and has long-standing relationships with neighbouring Indigenous communities.

Smithers is widely regarded as the professional and business services hub of northwest BC, supporting the forestry, mining, transportation, environmental consulting, and construction sectors across the region. Historically linked to mineral exploration, the town remains a key base for mining companies and service providers operating throughout northern BC. Smithers also benefits from a regional airport with daily connections to Vancouver, strong highway and rail access, and a growing tourism sector driven by skiing, mountain biking, fishing, hiking, and cultural events. High-quality healthcare, schools, and recreational amenities continue to attract families, professionals, and retirees to the community.

Village of Fraser Lake

The Village of Fraser Lake is a community of 965 residents (Statistics Canada 2021 Census) located along Highway 16 in the RDBN between Vanderhoof and Burns Lake. Situated on the shores of

Fraser Lake, the village serves as a service and employment centre for surrounding rural and Indigenous communities and offers affordable housing, strong community spirit, and abundant outdoor recreation opportunities. The local economy has historically been driven by forestry, anchored by the West Fraser sawmill, as well as mining, agriculture, tourism, and related service industries. The community lies within the traditional territories of the Nadleh Whut'en and Stellat'en First Nations, and its location along a major transportation corridor makes it an important stakeholder and workforce centre for natural resource and infrastructure projects in north-central BC.

7.1.1.1 Considerations of Local Government Plans in the Context of an Environmental Assessment

Relevant municipal and regional planning documents should be reviewed as part of the EA process to understand local land use objectives, growth strategies, infrastructure planning, economic development priorities, and community values. While these plans are not regulatory approvals under the BC EAA, they provide important context for assessing Project effects, identifying potential conflicts or opportunities, and informing engagement with local governments and communities.

For the Project, the plans summarized in Table 7.1-2 will be reviewed and referenced in the EAC Application, particularly within the Land Use, Socio-Economic, Infrastructure and Services, Community Well-Being and Cumulative Effects sections.

7.1.2 Summary of Engagement Activities

Project engagement to date with local governments is summarized in Table 7.1-3.

7.1.3 Issues and Interests

Table 7.1-4 provides a list of interests and issues raised by local governments, and how these governments wish to be engaged in Early Engagement and the EA process.

7.1.4 Planned Engagement

Surge is committed to maintaining open and ongoing communication with local and regional governments throughout the Project. Engagement will include regular meetings with elected officials to discuss Project updates, hear community perspectives, and respond to questions, as well as technical meetings with municipal and regional district staff to review Project planning, studies, and regulatory matters. Surge will also provide regular updates through newsletters and other communications to keep government representatives informed of Project activities and milestones. In addition, Surge will host public open houses in Smithers to share information with residents, gather feedback, and provide opportunities for direct dialogue with the Project team.

TABLE 7.1-2 MUNICIPAL AND REGIONAL PLANS

Priority Plan	Purpose/Content	Key Topics Relevant to a Mining EA	Potential EA Considerations
RDBN Official Community Plans (OCPs)	Establish long-term land use and development objectives for rural Electoral Areas, including future growth, environmental protection, agriculture, recreation, transportation, and resource development. The RDBN is also undertaking OCP reviews in several areas.	Land use compatibility, rural residential development, agriculture, recreation, environmental values, transportation corridors, Crown land use.	Assess consistency with regional planning objectives; identify potential conflicts with recreation, residential, agricultural, or tourism uses; evaluate cumulative effects and future development expectations.
Regional District of Bulkley-Nechako Strategic and Economic Development Plans	Provide direction for economic diversification, investment attraction, workforce development, business growth, agriculture, and sustainable resource development across the region.	Employment, procurement, training, economic benefits, regional development priorities.	Demonstrate how the Project supports regional economic goals; assess local employment and procurement opportunities; address potential economic risks and benefits.
Town of Smithers Official Community Plan and Related Development Policies	Guides growth, land use, housing, transportation, environmental stewardship, climate action, and economic development within Smithers.	Housing availability, transportation, municipal infrastructure, quality of life, economic growth, environmental protection.	Evaluate workforce housing demand, community service capacity, traffic impacts, economic opportunities, effects on recreation and tourism, and compatibility with community growth objectives.
Village of Burns Lake Official Community Plan and Economic Development Initiatives	Establishes community development priorities related to growth, infrastructure, tourism, commercial and industrial development, and economic diversification.	Community growth, employment, infrastructure, recreation, tourism, investment attraction.	Assess effects on municipal services, housing, emergency response capacity, workforce accommodation, local business opportunities, and long-term community benefits.
District of Houston Official Community Plan and Council Strategic Plan	Provides strategic direction for economic diversification, Indigenous reconciliation, infrastructure, sustainability, and community resilience.	Local procurement, infrastructure, workforce development, Indigenous relationships, community sustainability.	Evaluate business opportunities, labour supply, infrastructure demands, community benefits, Indigenous-community interests, and consistency with Houston's long-term development priorities.

TABLE 7.1-3 SUMMARY OF KEY ENGAGEMENT ACTIVITIES—LOCAL GOVERNMENT

Group	Key Activities
Regional District Bulkley-Nechako	February 2026 Met with CAO, Board Chair, Area E (Francois /Ootsa Lake) and Area G (Houston/Granisle) representatives—discussed labour opportunities and labour base for local communities, suggestion of a labour force analysis presentation to local elected officials and the cumulative effects of new projects in the region and impacts to infrastructure, solid waste, and other design aspects, as well as the benefits for the local communities. Also discussed wildfire management and evacuation. June 2026 Met with RDBN representatives and mayors of Burns Lake, Smithers, Fraser Lake and Houston. Discussed cumulative effects, TWMF plans, construction employment, site power supply and the NW Resource Benefit Alliance.
Town of Smithers	June 2026 Met with Smithers council members and discussed employment. July 2026 Mayor and a Councillor attended the site visit and tour and discussed various elements of the Project, regional interests and use of the adjacent recreational areas.
District of Houston	June 2026 Met with Houston councillors and Director of Community Development and discussed Nanika-Kidprice canoe route, mine infrastructure, Indigenous engagement and local community benefits via procurement and service provision
Village of Burns Lake	March 2026 Met with Mayor and CAO and discussed labour market survey being undertaken by District of Vanderhoof, logistics opportunities for the village to provide supplies and industrial sites, and training opportunities provided by College of New Caledonia. June 2026 Met with CAO and council members and discussed camp infrastructure, electricity to site, shipping of processed material and employment.
Village of Fraser Lake	February 2026 Met with Mayor and CAO and discussed Moon River Moly Ltd, and Endako mine and potential for partnerships in the region to grow communities

TABLE 7.1-4 SUMMARY OF INTERESTS OR ISSUES RAISED BY LOCAL GOVERNMENTS

Topic	Interest or Issues Raised	Surge Comments or Approach to the Interest or Issue
Safety	Interest in how the Project will manage wildfire risks and coordinate emergency preparedness, response, and evacuation planning to protect workers, residents, and nearby communities.	Surge has developed emergency procedures for the site, and Project at its early exploration stages. As part of the Project planning and assessment, Surge will provide a more robust plan addressing these elements.
Employment Opportunities	Interest in Project workforce requirements, labour market conditions, opportunities for local employment and training, workforce transition from other sectors such as forestry, and the anticipated sources of construction and operations personnel.	Labour market research is occurring.
Transmission Line	Interest in the Project's power requirements, the proposed power supply and transmission infrastructure, and the status and reliability of securing power for the Project.	Surge continues to work with BC Hydro and YLP in developing and defining power supply options and routing. CCN has also played a role in surfacing potential routing and supply options. These conversations will continue as the Project advances towards a preferred routing option.

Topic	Interest or Issues Raised	Surge Comments or Approach to the Interest or Issue
Truck Hauling	Interest in the types of haul trucks and equipment that will be used, including considerations related to diesel and electric technologies and associated environmental implications.	Plan is to utilized diesel trucks.
Transportation	Interest in proposed transportation and shipping routes for concentrate and other materials, including destination markets and transportation logistics.	Transportation options are still being assessed but it is anticipated that copper and molybdenum concentrates will be transported by truck and potentially by rail to port facilities to destination markets in Asia.
Project Design	Interest in the scale, purpose, and expected lifespan of major Project infrastructure, including the processing plant, accommodations camp, and supporting facilities.	Surge appreciates the flagging of these interests early in the conversation and Project design. Ongoing discussions will support clarity on these pieces, and the recently released PFS further supports that.
TWMF	Interest in the design, footprint, and construction of the TWMF, including potential land disturbance, waste rock stripping requirements, and implications for local topography and drainage.	The assessment process is anticipated to fully address these elements and Surge appreciates early surfacing of these interests.
Procurement and Business Opportunities	Interest in maximizing opportunities for local and regional procurement, contracting, and service provision, and in understanding how businesses in surrounding communities may participate in the Project.	Surge commits to ongoing conversations to better understand and align local businesses and anticipated opportunities with the Project.
Community Wellbeing	Interest in potential effects of the Project on recreational and tourism activities, including use of the Nanika-Kidprice canoe route and snowmobiling in the Sibola area.	The assessment process is anticipated to fully address these elements and Surge appreciates early surfacing of these interests.
Cumulative Effects	Interest in the potential cumulative effects of the Project on existing community infrastructure and services, including water supply, wastewater systems, solid waste management, and other regional infrastructure.	The assessment process is anticipated to fully address these elements and Surge appreciates early surfacing of these interests.

7.2 Provincial and Federal Government Agencies

7.2.1 Overview

Numerous federal and provincial government agencies will participate in the EA process, including reviewing the EAC/EIS Application, or be regulatory agencies or permitters of the Project. Table 7.2-1 provides a list of the agencies that will be engaged with for the Project.

7.2.2 Summary of Engagement Activities

To date, Surge has engaged provincial and federal agencies to understand the regulatory process and incorporate priorities and direction into Project assessment and planning (Table 7.2-2).

TABLE 7.2-1 FEDERAL AND PROVINCIAL GOVERNMENT AGENCIES POTENTIALLY INVOLVED IN THE ENVIRONMENTAL ASSESSMENT PROCESS

Federal Government Agencies	Provincial Government Agencies
• Crown Indigenous Relations and Northern Affairs Canada • Department of Women and Gender Equality (WAGE) • Employment and Social Development Canada (ESDC) • ECCC • DFO • Health Canada (HC) • IAAC • Indigenous Services Canada (ISC) • Innovation, Science and Economic Development Canada (ISED) • NRCan • Transport Canada (TC)	• BC EAO • MCM • Ministry of Energy and Climate Solutions • Ministry of Environment and Parks (ENV) • Ministry of Forests (MoF) • Ministry of Indigenous Relations and Reconciliation (MIRR) • Ministry of Jobs and Economic Growth • Ministry of Transportation and Transit (MOTI) • Ministry of Water, Land, and Resource Stewardship (WLRS) • Northern Health (NH)

TABLE 7.2-2 SUMMARY OF KEY ENGAGEMENT ACTIVITIES—PROVINCIAL AND FEDERAL AGENCIES

Date	Government Representative	Key Activities / Details
January-July 2026	EAO IAAC	Monthly meetings to discuss upcoming regulatory work (seeking concurrent permitting[1]), updates on early engagement with local governments, and engagement updates, including issues and interests raised, with First Nations leadership. Surge has expressed interest in expanded engagement with ECCC and DFO to discuss early dialogue and management planning on specific VCs including caribou and fish compensation plans and habitat.
July 10, 2026	DFO ECC	Met with the regional mining lead and team members from DFO to discuss the impacts to fisheries, habitat compensation planning and early offset and restoration plans. Met with ECCC regional team to discuss early offset and compensation/restoration planning for any anticipated impacts to caribou.

7.2.3 Planned Engagement

Surge will engage regularly with provincial and federal agencies throughout the EA process to support effective coordination, information sharing, and review of Project activities. This engagement will include regular meetings with the EAO, IAAC, and MCM, and other relevant agencies through pre-TAC discussions. Additional agency-specific meetings will be held as needed to discuss technical and process matters, including baseline studies, field programs, review of Project materials, and responses to agency comments. Surge will also track and address feedback received on Early Engagement deliverables and continue to collaborate with agencies on the review of baseline study results and the development of future baseline programs.

[1] Concurrent permitting means working on key permits at the same time as the Environmental Assessment, allowing both processes to move forward in parallel and reducing overall timelines.

7.3 Stakeholders and the Public

7.3.1 Overview

Surge is committed to ongoing engagement with local communities, stakeholders, and the public throughout the EA process. Public engagement is intended to promote understanding of the Project and assessment process, provide timely and accessible information, create opportunities for two-way dialogue, and identify and address questions, concerns, and opportunities raised by participants. Engagement activities are designed to support meaningful participation by providing information in clear, easy-to-understand formats and by incorporating feedback into Project planning, assessment, and mitigation development where appropriate.

Surge has conducted a database search of the land and resource registry to identify potentially affected landowners, tenure holders, land users and water users within the vicinity of the Project, as summarized in section 9.2. During the Early Engagement Phase each of these individuals or groups will be provided with information about the Project and given an opportunity to discuss potential effects specific to their land and resource use. Surge will also seek out community groups and non-government organizations that may have an interest in the area.

7.3.2 Summary of Engagement Activities

Public engagement has not yet commenced and will begin during the Early Engagement phase of the EA process. In accordance with EAO requirements, Surge is committed to engaging stakeholders and the public early and throughout the assessment process, including during the EAO's Public Comment Period. Informal efforts at engaging communities have occurred through attending the Witset Job Fair on May 27, 2026, as well as attending the Burns Lake Native Development Corporation's annual parade and community event for National Indigenous Peoples Day on June 21, 2026. During both these events information and presentations were shared by Surge Copper about the Project, its location and current stage in the development process. Comments were focused on employment opportunities, both near-term and longer term, as well as proximity to Kidprice Lake provincial park and fisheries interests.

7.3.3 Planned Engagement

Public and stakeholder engagement activities will provide opportunities to share Project information, understand local interests and concerns, and gather feedback to help inform the assessment. Initial discussions with local governments did not identify any concerns regarding the proposed engagement approach.

Public engagement activities will include community open houses, public presentations, online engagement opportunities and direct meetings. To support informed participation, Surge may provide a variety of communication materials, including newsletters, maps, figures, visual simulations, 3D models, flyover videos, and Project documentation. Through these engagement

activities, Surge will gather local information, community knowledge, and stakeholder perspectives to help identify values, interests, and potential concerns, and will consider this information in Project planning and in the preparation of the DPD.

Surge will also notify potentially affected tenure holders and private property owners of plans and seek collaborative engagement on the Project design.

Information gathered through public and stakeholder engagement will be used to inform Project planning and the assessment of potential effects. As information becomes available through engagement, technical studies, and other assessment activities, Surge will consider and incorporate feedback to:

- Identify and refine VCs and assessment priorities;
- Better understand community interests, concerns, priorities, and potential Project interactions;
- Identify and assess potential effects on communities, land and resource use, community services and infrastructure, local and regional economies, health and well-being, cultural and heritage values, visual quality, recreation, and other matters raised through engagement;
- Understand workforce availability, employment and contracting opportunities, training and capacity development needs, barriers to participation, and opportunities to enhance the long-term social and economic well-being of local and Indigenous communities, including underrepresented groups;
- Inform the development of Project design features, mitigation measures, and monitoring and follow-up programs; and
- Identify opportunities for stakeholder participation in Project planning, mitigation development, monitoring, and follow-up activities throughout the assessment process.

Surge recognizes that some potentially affected individuals or groups may face barriers to participation or may be underrepresented through standard engagement methods. During early engagement and the assessment process, Surge will work with local governments, First Nations, community organizations, service providers, stakeholders, and other knowledgeable parties to identify potentially affected and underrepresented populations, including those who may experience barriers related to accessibility, age, income, housing status, transportation, technology access, language, culture, work schedules, geographic location, or other social and economic factors. Where appropriate, Surge will update the engagement plan and adapt engagement approaches to address barriers and support participation through tailored engagement methods, accessible communication materials, meeting formats, locations, and timing. Engagement activities, feedback received, and responses to comments will be documented and tracked throughout the assessment process to promote transparency and accountability.

8. Existing Biophysical Environment

This section summarizes the existing biophysical setting in the Project Area, based on information collected and available to date. This section has been informed by Project-specific studies completed for the Project, as well as provincial and federal datasets.

Refer to Table 8-1 for an overview of baseline studies and activities completed to date.

TABLE 8-1 SUMMARY OF HISTORICAL AND CURRENT BASELINE STUDIES

Discipline	Years Active	Study Activities
Air Quality	2026	• Desktop station selection for characterizing conditions onsite for SO_2 and CO.
Noise and Vibration	2026	• Desktop review- to confirm applicable noise assessment requirements, identify potential receptors and use areas, and determine whether any targeted baseline monitoring is warranted.
Hydrology	2007–2008, 2011–2012, limited 2014–2017, 2024	• Installed and operated six continuous flow monitoring stations and four staff gauges (2007). • Collected continuous streamflow data and computed total runoff, monthly runoff distribution, peak flows, and low flows (2007–2008, 2011–2012). • Conducted seasonal streamflow measurements in May and October at three sites (2014–2017) to support water-quality load calculations. • Assessed suitable locations for reestablishing hydrometric monitoring, streamflow measurements, water level surveys (2024). • 2024 baseline program included sampling at ten locations representing upstream reference conditions, areas influenced by the Berg deposit. Analytical parameters included general water quality indicators, major ions, nutrients, total suspended solids, total dissolved solids, and dissolved and total metals. While some historical datasets contain QA/QC limitations and elevated analytical detection limits relative to current water quality guidelines, it is believed all historic data (which date back to 2007) can be incorporated into the baseline assessment to define long-term trends at the site. • Expansion of surface flow and surface water quality network and stations to include a total of 21 stations for surface water.
Meteorology and Climate	2007–2009, 2011, 2013–2017, 2024-2026	• Installed the Berg meteorological station (2007) and collected climate data until 2009. • Resumed data retrieval and added satellite telemetry and a new tower (2011). • Installed the Bergeland station at a lower elevation (2013). • Upgraded telemetry equipment (2015). • Collected multiparameter climate data—wind, temperature, humidity, snow depth, radiation, precipitation until 2017. • Reconnaissance-level hydrometric field program was completed to re-establish baseline monitoring and assess the condition and suitability of previously installed stations (2024). • Meteorological stations functional with regular data retrieval through 2025 and 2026.

Discipline	Years Active	Study Activities
Surface Water Quality	1988, 2007–2011, 2013–2017, 2024, 2026	• Conducted baseline water-quality sampling at 11 streams (2007–2011). • Performed seasonal sampling (May & October) at three core sites (2013–2017). • Identified pH-neutral water, soft–medium hardness, and elevated metals (Al, Cd, Cu, Fe, Pb, Zn) relative to BC/CCME guidelines ("elevated levels of aluminum, cadmium, copper, iron, lead, and zinc"). • Documented seasonal differences between May and October samples. • Baseline program included sampling at ten locations representing upstream reference conditions, areas influenced by the Berg deposit. Analytical parameters included general water quality indicators, major ions, nutrients, total suspended solids, total dissolved solids, and dissolved and total metals (2024). • Expanded existing monitoring network and data set to include a full 21 surface water quality sites (2026) against all parameters, surface water quality expended to include monthly sampling at creeks as well as Nanika and Kidprice Lakes. • Bathymetry and water column analysis conducted on both Kidprice and Nanika Lakes (2026).
Groundwater	2024, 2026	• Drilling and exploration infill holes (2024). • ARD sampling information and results (2024). • Creation of extensive hydrogeology (groundwater) network across the site including more than 25 monitoring wells, vibrating wire piezometers, and related instrumentation.
Fish and Fish Habitat	1988, 2007, 2024-2025, 2026	• Conducted fish and habitat inventory across Bergeland Creek, Ney River, and tributaries (2007). • Sampled six stream locations; no fish captured due to late-season timing. • Identified potential salmonid habitat in lower-elevation streams and noted the absence of barriers, suggesting probable fish presence. • Compiled species lists for lakes and rivers in the study area (trout, salmon, whitefish). • Reconnaissance fish and fish habitat inventorying and stream sampling (2024). • Fish survey locations list and fish habitat inventory cards (2025). • Aquatic baseline studies include fish habitat mapping, lake fish community assessments, and surface water quality and hydrology monitoring to characterize existing aquatic conditions, identify potential habitat offsetting opportunities, and support the effects assessment. • eDNA sampling program across the Project Area (2026). • Fish Habitat Assessment Planning and Process undertaken across the Project Area (2026).
Soils and Vegetation	2026	• Identified biogeoclimatic zones present in the Project Area (2021 map): Boreal Altai Fescue Alpine, ESSF Moist Cool, Mountain Hemlock Leeward Moist Maritime. • Summarized soil types and dominant vegetation for each zone. • Terrestrial Ecosystem Mapping (TEM) field investigations (2026).

Discipline	Years Active	Study Activities
Wildlife	Incidental observations, 2025, 2026	• Recorded incidental wildlife sightings (grizzly bear, mountain goat, moose, various birds). • Identified overlap with mountain goat UWR #U-6-003 and northern boundary of Tweedsmuir-Entiako caribou range. • Project-specific habitat suitability modelling for caribou is underway and in-field validation is proposed (2025). • Baseline monitoring programs: ◦ Wildlife monitoring using autonomous recording units and remote cameras (deployment, servicing, and retrieval); ◦ Targeted surveys for goshawk, amphibians, caribou, ungulates, marmots, and pikas; ◦ Pellet count surveys for ungulates, with a focus on caribou; and ◦ Aerial wildlife and winter track surveys.
Geochemistry	2007, 2024-2026	• Collected 45 drill core samples and 10 water samples for ML/ARD characterization (2007). • Determined most rock types within main resource zone are potentially acid generating (neutralization potential ratio < 1 for 86.7% of 2007 samples). • Identified naturally occurring acidic, metal-rich drainage exceeding MDMER monthly mean concentrations. • Additional 21 Samples Collected in 2024 from resource area step-out holes and geotechnical drilling holes. • Additional 38 samples collected in 2025 from dedicated ARD target drilling within the open pit and TWMF areas and 5 surface samples to define target vectors for PAG-NPAG boundary definition. • Continued targeted drilling in 2026 to further build out PAG-NPAG boundary within open pit with dedicated drill holes within open pit waste areas. Established field bins and additional ABA and saturated column testing across tailings, supergene and hypogene areas of the Project (2026).
Visual Resources	2026	• Desktop-based preliminary selection of viewpoints for viewshed modelling.
Archaeology	2026	• Desktop support for exploration activities and Heritage Investigation Permit application submission.

8.1 Biophysical Environment

8.1.1 Climate

Based on the Köppen climate classification (1884), the Project is in a subarctic climate (type “Dfc”) and temperate zones, typically with long, very cold winters and short, cool summers.
Average monthly temperatures at Kemano station ranged from -1.5° C in January to 16.5° C in July. Total annual precipitation is 1,986.9 mm, of which 58% occurs between October and January.

The climate stations close to the Project site are Tahtsa Lake West, Kemano, Kitimat and Kitimat Townsite (Figure 8.1-1). The climate normal data (1981-2010) for the Kemano station was chosen for water balance analysis in the PEA (Table 8.1-1). Table 8.1-2 summarizes extreme storm events for the various return periods observed at the Kitimat station.

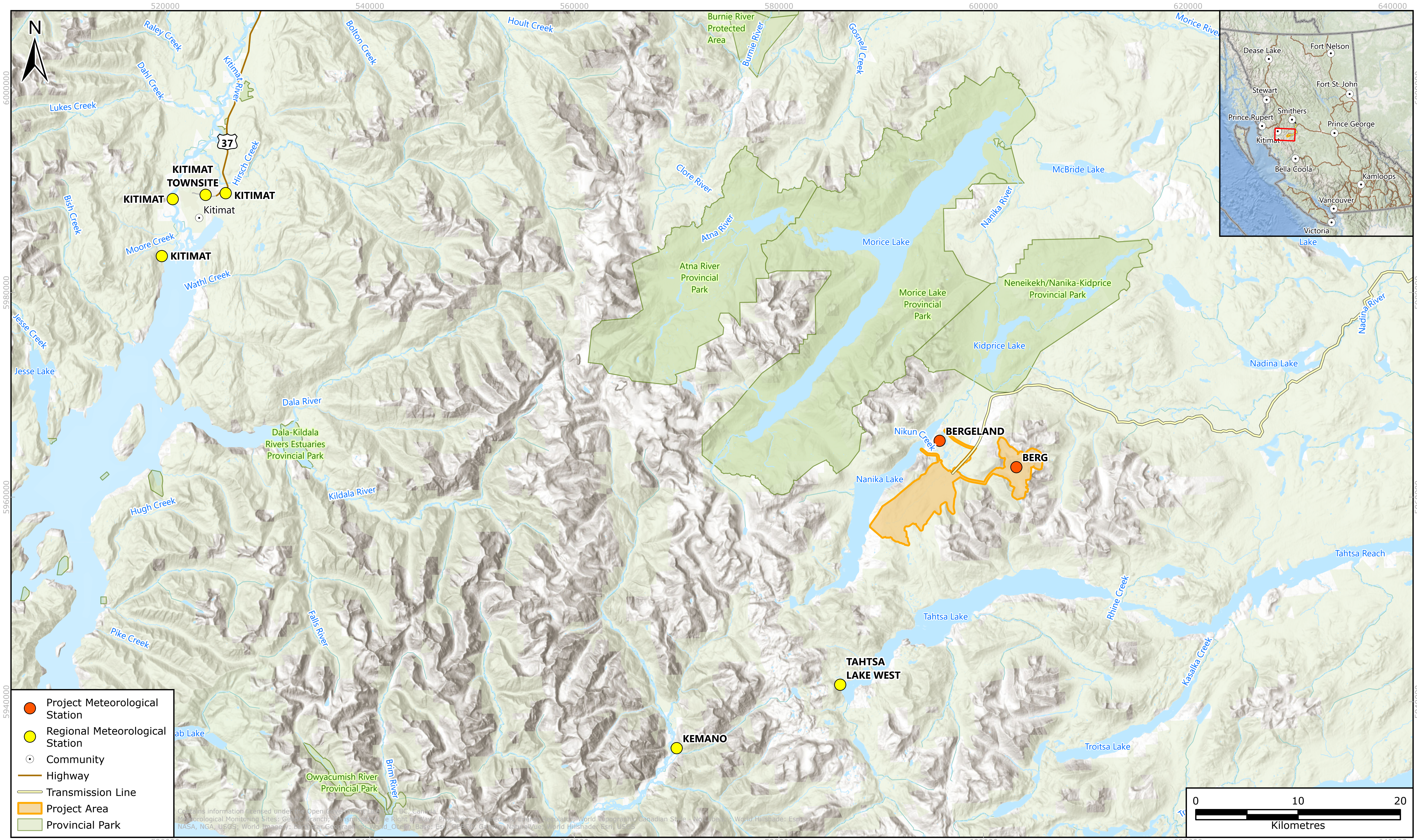
TABLE 8.1-1 CLIMATE DATA FROM THE KEMANO STATION (1981-2010)

Month	Daily Temperature (°C)			Rainfall (mm)	Snowfall (cm)	Precipitation (mm)
	Average	Maximum	Minimum			
Jan	-1.5	1.1	-4	190.2	59.7	249.8
Feb	0.4	3.6	-3	136.3	34.3	170.6
Mar	3.3	7.6	-1.1	122.2	15.3	137.5
Apr	7.2	12.6	1.8	98.1	2.2	100.3
May	11.1	17.0	5.2	68.7	0.0	68.7
Jun	14.4	20.2	8.5	62.5	0.0	62.5
Jul	16.5	22.3	10.5	61.9	0.0	61.9
Aug	16.4	22.1	10.6	76.9	0.0	76.9
Sep	12.7	17.4	7.9	162.5	0.0	162.5
Oct	7.2	10.4	4	315.2	2.5	317.7
Nov	1.9	4.1	-0.4	257.6	35.5	293.1
Dec	-0.8	1.3	-3	219.6	65.8	285.4
Annual Total	**7.4**	**11.6**	**3.1**	**1,771.6**	**215.3**	**1,986.9**

TABLE 8.1-2 EXTREME STORM EVENTS FOR KITIMAT STATION

Return Period Duration	2-year	5-year	10-year	25-year	50-year	100-year
5 min	2.1	2.9	3.5	4.5	5.4	6.4
10 min	3.2	4.2	5.2	6.8	8.0	8.6
15 min	4.4	5.7	6.4	7.4	8.0	8.6
30 min	6.5	7.7	8.8	10.5	12.1	14.1
1 hr	10.4	12.8	14.6	17.1	19.3	21.6
2 hr	17.6	21.8	24.9	29.5	33.4	37.8
6 hr	41.2	53.6	62.6	75.1	85.1	95.8
12 hr	63.0	80.9	94.3	113.3	129.0	146.2
24 hr	91.7	116.9	132.3	150.6	163.2	175.1

FIGURE 8.1-1 METEOROLOGICAL STATIONS LOCATIONS



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Meteorological studies related to the Project began in 2007 with the installation of the Berg meteorological station. Following installation, the station was actively maintained until the fall of 2009, after which the station remained operational, but no station maintenance or data retrieval was performed until the fall of 2011. In September and October 2011, a satellite telemetry system was added to the station, and the original aluminum tower was replaced with a galvanized steel tower.

A second meteorological station, Bergeland, was installed in August 2013 at a lower elevation, between Bergeland Creek and Nanika Lake, close to the proposed tailings area. In May 2015, the existing satellite telemetry equipment at the Berg station was upgraded with new equipment. Meteorological data for the following parameters were collected until 2017: wind speed and wind direction, air temperature, relative humidity, snow depth, net radiation, solar radiation, and precipitation.

The most recent reporting year of 2016/2017 noted that at the Berg station, temperatures ranged from -26°C (February 7) to 24°C (August 10). Monthly mean temperatures ranged from -11°C in February to 10°C in August. At the Bergeland station, temperatures ranged from -23°C (February 7) to 29°C (August 8). Monthly mean temperatures ranged from -8°C in February to 14°C in August.

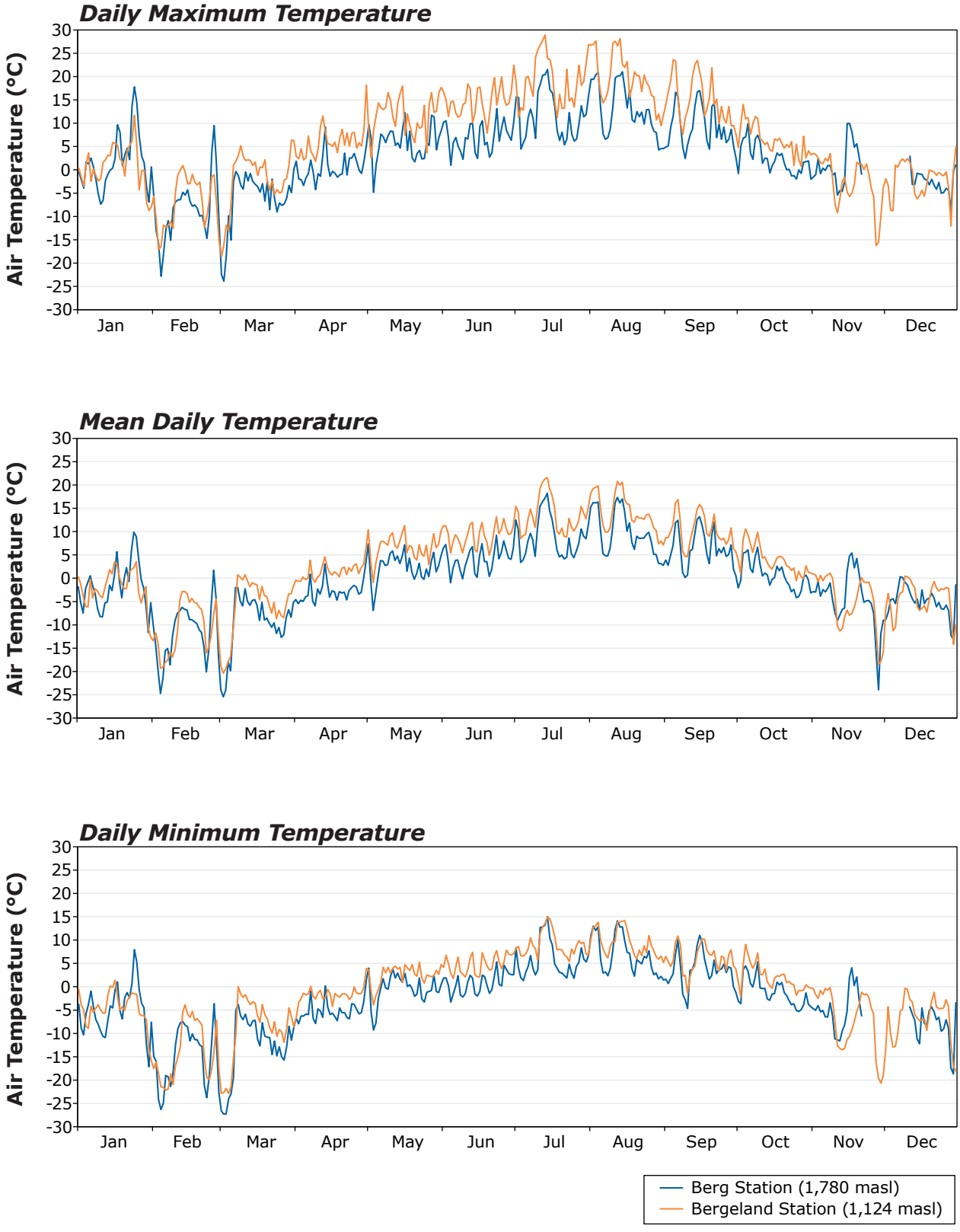
From October 2016 to December 2017, there were 48 days of temperature inversions where the daily mean air temperature at the higher elevation Berg station (1,780 masl) was higher than the temperature at the lower elevation Bergeland station (1,124 masl). Temperature inversions primarily occurred during the winter months. There were 18 days when the temperature inversion difference was at least 5°C between the two stations, and there were six days when the temperature difference was higher than 10°C (Figure 8.1-2). The maximum temperature inversion difference was 15°C on December 7, 2017, when the Berg station daily mean air temperature was 7°C, and Bergeland was -8°C.

At the Berg station, July, February and November 2017 were cooler, and August was warmer compared to the 2012 to 2016 historical monthly station data. At the Bergeland station, May, June, and July were generally cooler, and August was warmer compared to the 2013 to 2016 historical monthly station data.

In reference to the above-mentioned data the ECCC Climate Trends and Variations Bulletin (ECCC 2018) reported that the 2016/2017 Pacific Coast Region winter was cooler than normal, and spring and summer were warmer than normal, compared to the past 70 years of data. In the smaller region surrounding the Berg Copper Project, winter and fall temperatures were normal (0.0°C departure), and spring and summer were warmer than normal (+1.0°C and +0.5°C departure, respectively).

In 2024, a reconnaissance-level hydrometric field program was completed to re-establish baseline monitoring and assess the condition and suitability of previously installed stations. This work included verification of historical station locations, identification of new monitoring sites, and collection of discharge measurements to support future development of stage-discharge relationships (Northwest Hydraulic Consultants Ltd., 2024).

FIGURE 8.1-2 2016/2017 DAILY TEMPERATURE VALUES AT THE BERG AND BERGELAND STATIONS



Long-term monitoring of the Project study area will be required for the Project to advance through FS, EA, and permitting to further characterize the hydrological conditions and develop a water balance model and long-term life-of-mine water management plan. More recent meteorological data will also be required to supplement the historical data previously collected.

8.1.2 Aquatic Resources, Fish and Fish Habitat

8.1.2.1 Existing Environment

The Project is located within the upper Nanika River watershed in west-central BC, which forms part of the Morice River drainage basin. The Project Area encompasses a network of alpine and subalpine streams, lakes, wetlands, and groundwater-fed tributaries that ultimately discharge to Bergeland Creek, Berg Creek, the Ney River, and tributaries of Tahtsa Lake. These watercourses support interconnected aquatic ecosystems that provide habitat for native fish populations and contribute to the ecological integrity of downstream receiving environments.

The aquatic environment is characterized by cold, well-oxygenated waters originating from alpine snowmelt, groundwater discharge, wetlands, and precipitation. Stream morphology varies considerably, with steep, confined headwater channels in upper elevations transitioning to lower-gradient alluvial channels and valley-bottom reaches that provide the highest quality fish habitat. Numerous features, including waterfalls, cascades, steep gradients, braided channels and seasonally dewatered reaches, influence watershed connectivity and limit fish distribution.

The Project Area remains largely undeveloped, with aquatic ecosystems occurring under predominantly natural conditions. Existing disturbances are limited primarily to historical mineral exploration activities, localized access roads and stream crossings, helicopter-supported exploration programs, and previous drilling activities. No major watercourse modifications or permanent alterations to aquatic habitat have been identified within the Project Area.

8.1.2.2 Fish and Aquatic Habitat

Reconnaissance fisheries investigations completed in 2011, 2024, and 2025, together with historical regional fisheries studies, indicate that the Project Area supports a fish community typical of upper watershed environments in central BC. Baseline investigations have focused on characterizing fish distribution, identifying fish-bearing waters, documenting aquatic habitat characteristics, and identifying natural barriers that influence fish movement throughout the watershed.

Current information indicates that Dolly Varden (*Salvelinus malma*) are the predominant fish species within the Bergeland Creek watershed and occur throughout accessible reaches of Bergeland Creek and tributaries. Rainbow Trout (*Oncorhynchus mykiss*) have been documented within connected lakes and lower-gradient reaches, while Lake Trout (*Salvelinus namaycush*), Lake Chub (*Couesius plumbeus*) and Longnose Sucker (*Catostomus catostomus*) have been recorded within selected lacustrine environments and associated outlet channels. Fish distributions are strongly influenced by naturally occurring migration barriers, including waterfalls, cascades, steep channel gradients, and

intermittent reaches that create extensive naturally fishless headwater systems. No isolated fish populations have been identified upstream of permanent migration barriers.

Aquatic habitat quality varies throughout the Project Area according to channel morphology, hydrologic connectivity, and groundwater influence. Lower-gradient reaches of Bergeland Creek and its larger tributaries provide the highest quality habitat and contain a diversity of riffle, run, and pool habitats, spawning gravels, overhead cover, and groundwater-influenced habitats suitable for fish spawning, juvenile rearing, migration, and overwintering. In contrast, upper elevation tributaries consist of steep, confined channels with coarse substrates, bedrock controls, or ephemeral flow conditions that provide limited fish habitat despite contributing to watershed hydrology and downstream aquatic ecosystem processes.

Although fish abundance within the Bergeland Creek watershed appears to be relatively low, multiple age classes of Dolly Varden have been documented in several tributaries, including observations of gravid individuals that indicate successful local reproduction. Existing information suggests that groundwater-fed tributaries and lower-gradient stream reaches provide important spawning and rearing habitat within the watershed. Historical information also identifies important Rainbow Trout spawning habitat within the broader Nanika River system downstream of the Project Area. Work is underway to confirm salmonid species absence (as currently documented and understood) across a number of key waterways including Nanika Lake, Kidprice Lake and pocket lakes within the Bergeland creek area.

8.1.2.3 Key Environmental Values and Sensitive Features

The aquatic environment contains several features that are considered environmentally sensitive and will be considered during Project planning, design, and EA. Key fisheries and aquatic habitat values identified through baseline investigations include:

- Fish-bearing reaches of Bergeland Creek and connected tributaries;
- Resident populations of Dolly Varden are distributed throughout accessible portions of the watershed;
- Rainbow Trout habitat associated with connected lakes and lower-gradient stream reaches;
- Groundwater-fed tributaries that provide suitable spawning and rearing habitat;
- Identified potential spawning, rearing, migration, and overwintering habitats;
- Riparian vegetation that supports bank stability, nutrient cycling, channel function, and aquatic productivity;
- Wetlands, ponds, and off-channel aquatic habitats that contribute to hydrologic and ecological connectivity; and
- Naturally fishless headwater systems that contribute to watershed hydrology, sediment transport, and downstream aquatic ecosystem function.

No federally or provincially listed aquatic Species at Risk have been documented within the Project Area during fisheries investigations completed to date. However, baseline studies remain ongoing and will continue to evaluate species occurrence and habitat suitability as additional field information becomes available.

8.1.2.4 Existing Information and Planned Studies

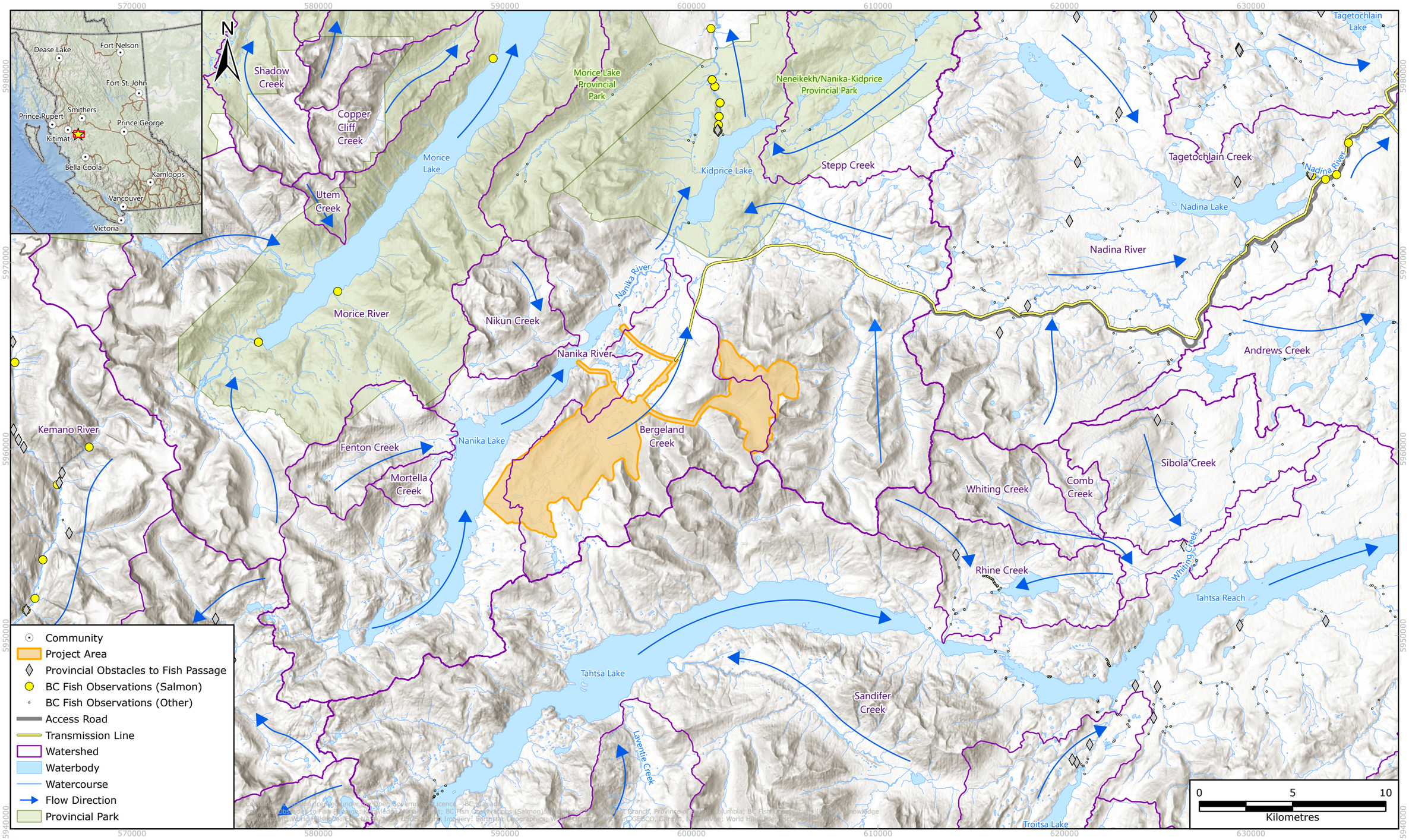
An understanding of existing fisheries conditions has been developed through historical regional studies, previous environmental investigations completed for the Project, provincial fisheries databases, and reconnaissance fish and fish habitat surveys completed in 2011, 2024, 2025 and underway in 2026. Existing information includes fish distribution, habitat characterization, stream classification, identification of migration barriers, hydrologic observations, and water quality information collected throughout the Bergeland Creek watershed and adjacent drainage basins. Existing information used to characterize fish and fish habitat within the Project Area includes:

- Historical fisheries investigations completed within the Nanika and Morice River watersheds;
- Previous fisheries assessments completed for the Project and associated exploration activities;
- Provincial fisheries databases, including Fisheries Information Summary System and Fish Inventory Data Queries (FIDQ);
- Reconnaissance fish and fish habitat surveys completed in 2011, 2024, and 2025;
- Surface water quality and hydrological monitoring programs; and
- Regional environmental studies completed for the Kemano Completion Project and other relevant developments within the upper Nanika River watershed.

Additional baseline investigations are planned (Table 8.1-3) to further characterize fish populations and aquatic habitats in support of the EA and future permitting requirements. Planned studies include detailed fish habitat mapping, fish population assessments, spawning and overwintering surveys, lake inventories, benthic invertebrate sampling, tissue chemistry, and continued surface water quality and hydrological monitoring. These investigations will provide the information necessary to characterize aquatic ecosystem function, identify sensitive habitats, evaluate potential Project interactions, and support the development of mitigation measures and regulatory applications under the *Fisheries Act*, *Water Sustainability Act*, and other applicable legislation.

Figure 8.1-3 provides an overview of fish habitat and fish barriers within the regional watersheds.

FIGURE 8.1-3 FISH HABITAT AND FISH BARRIERS WITHIN REGIONAL WATERSHEDS



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TABLE 8.1-3 ONGOING AND PLANNED FISHERIES STUDIES

Study	Purpose	Status
Historical Fisheries Investigations (1974–2011)	Regional fish distribution, stream classification, and habitat characterization	Complete
Reconnaissance Fish and Fish Habitat Surveys (2024–2025)	Characterize fish distribution, fish-bearing waters, habitat conditions, and migration barriers	Complete
Detailed Fish Habitat Assessment Procedures	Quantify and map fish habitat within potentially affected watersheds, potential to evaluate future habitat offsetting site	Planned (2026–2027)
Fish Population Assessments	Estimate abundance and population characteristics of resident fish species	Planned
Spawning and Overwintering Surveys	Confirm seasonal habitat use and identify critical habitats	Planned
Lake Fish Community Surveys	Characterize fish communities within lakes potentially influenced by Project activities	Ongoing
Benthic Invertebrate and Tissue Chemistry Programs	Characterize aquatic ecosystem health and establish baseline conditions	Planned
Surface Water Quality and Hydrology Monitoring	Characterize existing aquatic conditions and support effects assessment	Ongoing

8.1.3 Hydrology

The Project is located within the Southern Hazelton Mountains Hydrologic Zone (Zone 9; Coulson and Obedkoff 1998). This region is characterized by rugged, steep-sided mountain terrain with elevations ranging from valley bottoms near 500 m to peaks exceeding 2,500 m. The landscape was heavily shaped by glaciation, resulting in deeply incised valleys, exposed bedrock, and widespread deposits of glacial till. Drainage networks are well developed, and valleys are typically narrow with steep sidewalls.

The cool, humid mountain climate is influenced by Pacific weather systems, with moderate to high precipitation that increases substantially with elevation due to orographic effects. Winters are long and snowy, while summers are generally short and mild. Snow accumulation at higher elevations forms an important component of the annual water balance. High-elevation snowpack generates freshet flows during spring and early summer, while rainfall contributes significantly to runoff throughout the year. Steep slopes promote rapid runoff and efficient drainage, resulting in flashy stream responses to precipitation events.

Project infrastructure is planned to be contained within the Bergeland Creek and Ney River watersheds, which contain a network of smaller tributaries that flow into the larger systems. Runoff from the Project Area drains north toward the Nanika River, followed by the Morice River, Bulkley River, and ultimately the Skeena River before it is discharged into the Pacific Ocean.

Baseline hydrometric data has been gathered in streams surrounding the Project Area between 2007 and 2017, with intermittent monitoring and maintenance of these stations during this period. Over this period, hydrometric monitoring has occurred at 17 different locations across a range of watershed sizes and elevations. In September 2024, Triton Environmental Consulting (Triton), in collaboration with Northwest Hydraulic Consultant, completed reconnaissance work to facilitate the reinitiation of the hydrometric baseline monitoring program surrounding the Project to support development of Surge's mine plan. More recent hydrology work included expanding the monitoring network to a full suite of 21 surface water quality stations, with monthly sampling now conducted at key creeks as well as Nanika and Kidprice Lakes. In 2026, bathymetric surveys and water-column profiling were completed for both lakes, providing updated depth, stratification, and limnological data to support ongoing baseline characterization.

Baseline data and field visits have noted difficult hydrometric monitoring conditions at the Project Area. Significant river avulsions have occurred since monitoring began in 2007, and higher elevations are characterized by unconfined channel reaches, unstable hydraulic controls, and avalanche and terrain stability concerns.

8.1.4 Geochemistry

The Project is located within the Hazelton Mountains, where mineralization associated with the Berg porphyry copper-molybdenum deposit has resulted in naturally elevated concentrations of sulphide-bearing rock and localized occurrences of naturally acidic, metal-rich drainage. The Project Area is characterized by a diverse range of intrusive and volcanic rock types, glacial deposits, and weathered bedrock that will influence the geochemical behaviour of materials disturbed during mining and the long-term management of mine wastes.

The geochemical environment reflects both the regional geological setting and historical weathering processes. Variability in lithology, alteration, sulphide mineralization, and weathering has resulted in differing capacities for acid generation and metal leaching across the Project Area. Understanding the distribution and behaviour of these materials is fundamental to predicting potential effects on water quality, supporting mine waste management planning, and identifying appropriate mitigation measures throughout the Project life cycle.

The Project Area remains largely undeveloped, with existing disturbances limited primarily to historical mineral exploration activities, localized access roads, drill pads, and associated infrastructure. Although naturally occurring metal-rich drainage has been identified in portions of the Project Area, no historical mining has occurred that would substantially alter baseline geochemical conditions.

The objective of the geochemical baseline program is to characterize the ML/ARD potential of mine rock, tailings, overburden, and borrow materials that may be disturbed by the Project. Developing an understanding of baseline geochemical conditions will support assessment of potential Project effects on water quality, inform mine waste management strategies, refine Project design, and support development of mitigation and closure measures.

Initial geochemical characterization of the Project was completed by AMEC Earth & Environmental in 2007 as part of the baseline environmental program (AMEC 2007). The study included an analysis of 45 drill core samples collected from the mineralized resource area together with ten surface water samples. As drilling at the time was concentrated within the area of the known mineral resource, the program primarily characterized ore and provided only limited information on the range of waste rock materials that may be generated during mining.

The preliminary characterization concluded that the distribution of acid-generating and acid-neutralizing minerals had been significantly influenced by supergene mineralization processes. The post-mineral dyke was preliminarily classified as NPAG, while the Berg Stock, andesite, and quartz diorite were generally classified as PAG, with approximately 87% of samples exhibiting neutralization potential ratios less than one. The study also identified naturally occurring acidic, metal-rich drainage that exceeded Metal and Diamond Mining Effluent Regulations (MDMER) monthly mean concentrations for some parameters.

In 2024 Surge initiated a geochemistry program to further assess the ML/ARD risk from mined rock, overburden, tailings, and other materials outside the main mineralized resource. Additional sampling undertaken during the 2024, 2025 and 2026 drilling programs targeted areas representative of the proposed open pit, TWMF area and associated infrastructure to better characterize the range of materials that may be disturbed during Project development. While several samples collected from the open pit area and associated material types were classified as PAG with elevated sulphur content, the results indicate a transition zone beyond the porphyry where waste rock exhibits lower sulphur levels and can therefore be classified as NPAG.

In 2026, Lorax Environmental completed a geochemical gap assessment that reviewed the available geochemical information and identified additional work required to support EA, mine waste management planning, and permitting.

Geochemical investigations, including long-lead items like Acid Base Accounting and Humidity Cell Testing, and field bins will continue throughout Project development and the EA process. Ongoing laboratory testing and interpretation will further characterize the geochemical behaviour of all major mine materials and improve understanding of potential water quality effects. The resulting information will inform mine waste management planning, water quality predictions, Project design, mitigation measures, closure planning, and the assessment of potential Project effects in the EAC Application.

8.1.5 Hydrogeology

The Project is located within the upper Nanika River watershed in the Sibola Range of west-central British Columbia. Hydrogeological investigations are underway for the Project with an extensive monitoring network being established in 2026 to support baseline gathering and analysis across the Project Area. Available information is limited to regional geological understanding, surface water studies, and observations from the 2025 geotechnical investigation. Twelve VWPs in the open pit area were installed in 2024 and three VWPs were installed in 2025 within the proposed Tailings and Water Management Facility area to support groundwater monitoring; data from these and other monitoring wells will be collected on a quarterly basis.

Groundwater occurs within both unconsolidated surficial materials and fractured bedrock, where it contributes to stream baseflows, supports groundwater-fed wetlands and headwater streams, and forms an integral component of the regional hydrologic system.

Hydrogeological conditions are strongly influenced by steep mountain topography, glacially derived sediments, fractured intrusive and volcanic bedrock, and substantial seasonal snow accumulation. Recharge is expected to occur primarily through infiltration of precipitation and snowmelt at higher elevations, with groundwater flowing through weathered bedrock and fractured rock before discharging to valley-bottom streams, wetlands, and other surface water features. Groundwater and surface water are therefore expected to be closely connected throughout much of the Project Area.

The Project Area remains largely undeveloped, with existing groundwater conditions reflecting predominantly natural processes. Existing disturbances are limited to historical mineral exploration activities, exploration drilling, localized access roads, and associated infrastructure. Consequently, the existing groundwater regime provides an important baseline against which potential Project-related changes can be assessed.

The objective of the hydrogeological baseline program is to develop an understanding of the groundwater system, including groundwater occurrence, flow directions, hydraulic characteristics, groundwater quality, and groundwater-surface water interactions. Characterizing groundwater conditions prior to Project development provides the basis for assessing potential effects of mining on groundwater quantity and quality, stream baseflows, groundwater-dependent ecosystems, and water management requirements throughout the Project life cycle.

Current information indicates that overburden thickness within the proposed mine area varies considerably, ranging from exposed bedrock to approximately 80 m, with an average thickness of approximately 10 m. Ongoing geotechnical and hydrogeological investigations are refining understanding of the extent of weathered bedrock, which generally exhibits higher hydraulic conductivity than underlying competent bedrock.

Groundwater flow is expected to generally follow topography, moving from higher elevations toward lower valley bottoms where the proposed processing facilities are located.

Seasonal groundwater fluctuations are anticipated in response to snowmelt, precipitation, and changing hydrologic conditions.

Hydrogeological investigations completed to date have included geotechnical drilling, installation of VWPs, groundwater level monitoring, packer testing, and compilation of geological and hydrogeological information from previous exploration and environmental programs. Investigations undertaken during 2024 and 2025 identified a range of hydraulic conductivities representative of fractured bedrock and overburden conditions and documented several locations exhibiting artesian groundwater conditions, indicating localized confined groundwater systems that warrant further characterization.

A hydrogeological gap assessment completed by Lorax Environmental in 2026 reviewed the available groundwater information and identified priorities for continued baseline investigations.

Hydrogeological investigations will continue throughout Project development and the EA process. Planned work includes installation in 2026 of additional groundwater monitoring wells across the Project Area, focused investigations within the proposed TWMF footprint, continued groundwater level and groundwater quality monitoring, refinement of the conceptual and numerical groundwater models, and continued assessment of groundwater-surface water interactions.

Information collected through these investigations will support assessment of potential Project effects on groundwater quantity and quality, groundwater contributions to surface waters, and inform an integrated water balance model that will predict mine inflows, seepage management, water treatment requirements, and closure planning. The hydrogeological model will also support development of mitigation measures, monitoring programs, and adaptive management strategies that will be evaluated through the EA process.

8.1.6 Surface Water Quality

The Project is located within the upper Nanika River watershed in the Morice River basin. Surface water drainage within the Project Area is dominated by Berg Creek, Bergeland Creek, the Ney River, and their associated tributaries, which ultimately flow into the Morice and Skeena river systems. The region is characterized by steep mountainous terrain, high annual precipitation, substantial snow accumulation, and strong seasonal runoff patterns driven by spring freshet and rainfall events. Surface water quality within the Project Area has been characterized through baseline monitoring programs completed since 2007 in the Berg Creek, Bergeland Creek, Ney River, and reference watersheds. The existing dataset includes analyses of general water chemistry, nutrients, major ions, total suspended solids, and metals.

Baseline monitoring has identified spatial patterns in surface water quality that reflect the naturally mineralized geology associated with the Berg deposit. Surface waters draining the deposit area, particularly within the Berg Creek watershed, exhibit naturally elevated concentrations of dissolved solids, sulphate, hardness, conductivity, and several metals relative to downstream and reference

locations. Monitoring has also identified elevated concentrations of aluminum, cadmium, copper, iron, lead, and zinc at some locations relative to applicable water quality guidelines, consistent with naturally occurring metal-rich drainage associated with mineralized bedrock in the region.

Water quality conditions generally improve downstream of the mineralized area due to dilution from tributary inflows, with Bergeland Creek exhibiting lower concentrations of dissolved constituents and metals than upper Berg Creek. The Ney River and reference watersheds are characterized by comparatively lower concentrations of metals and dissolved constituents and are considered representative of regional background conditions. Nutrient concentrations throughout the study area are generally low. Surface waters throughout the study area are generally well oxygenated and near neutral pH.

Recent monitoring completed in 2024 indicated that conditions remained consistent with historical baseline observations, suggesting that the spatial patterns and constituent concentrations observed within the watershed have remained relatively stable over time.

Additional surface water quality monitoring was completed in 2025 and is planned to continue in 2026 to further characterize seasonal and interannual variability, confirm that current water quality conditions remain consistent with historical baseline studies, and support future EA activities, water management planning, and effects assessment for the Project.

8.1.7 Visual Resources

Existing visual and artificial light at night (ALAN) conditions near the Project Area are largely undisturbed; there are some forest cutblocks present along the proposed access road route, but beyond the terminus of the Sibola FSR, there is little activity contributing to visual disturbances or ALAN based on preliminary satellite reconnaissance. It is Surge's intent to initiate and complete desktop studies and field verifications to document the existing visual and ALAN conditions to serve as the basis for the EA.

These data will inform the visual modelling of the Project for the EA and potential mitigation measures to limit effects of visual disturbances and ALAN on the environment.

8.1.8 Noise and Vibration

The Project is considered outside of the effects of permanent stationary noise sources. Acoustic environment could be affected by existing forestry operations, road maintenance and recreational users (e.g., all-terrain vehicles, snowmobiles) however, given the distance of these activities from the Berg Copper Project their influence on the existing acoustic environment is expected to be minimal.

At the current time, there is no quantitative data available to assess the existing noise levels in the Project Area. It is Surge's intent to initiate and complete a baseline noise monitoring program to inform the EAC Application. The baseline noise monitoring program would entail sound metres

placed at representative locations selected with consideration of proposed Project infrastructure, transportation routes, potential future noise-sensitive receptors, areas of cultural land and resource use, and, where practicable, sensitive wildlife habitat near the mine site, processing plant site, TWMF site and access route locations collecting data to capture a minimum of 72 consecutive hours at each location in summer and winter. These data will inform the Noise and Vibration Assessment, including prediction of Project-related noise levels and the development of mitigation measures to avoid, reduce, or manage potential effects, as applicable.

A desktop review will be conducted to evaluate the potential for vibration effects associated with Project activities, including blasting, where applicable.

8.1.9 Vegetation and Ecosystems

The 2026 Biogeoclimatic Ecosystem Classification map (Government of BC 2026) for the Morice Sub unit, Nadina Resource District, Skeena Region identifies three primary biogeoclimatic units within the Project Area:

- **Boreal Altai Fescue Alpine Undifferentiated—**High-elevation, often steep and rugged terrain dominated by well-vegetated alpine tundra. Soils are typically shallow and derived from weathered bedrock. Vegetation is low stature and sparse, consisting mainly of dwarf willows, fescue grasses, sedges and lichens; ecological functions emphasize alpine forage, erosion control and seasonal wildlife use.
- **Moist Cool Engelmann Spruce–Subalpine Fir Subzone—**Subalpine forest zone characterized by coarse-textured Humo-Ferric Podzols and a mixed conifer canopy. Dominant trees include Engelmann spruce, subalpine fir, mountain hemlock, amabilis fir and lodgepole pine. This zone supports closed-canopy forest structure, snowpack-driven hydrology, and habitat for montane wildlife.
- **Leeward Moist Maritime Mountain Hemlock Variant—**Moist, leeward coastal-influenced forests with Humo-Ferric and Ferro-Humic Podzols. Typical species are mountain hemlock, amabilis fir, western hemlock and subalpine fir. The zone features dense understories, high biomass accumulation, and important roles in watershed stability and late-season water storage.

The Berg property is located within the Morice Timber Supply Area (TSA) administered by the Nadina Natural Resource District office in Burns Lake. This TSA covers approximately 1.5 million hectares of the Skeena Natural Resource Region.

As part of the background data, a search using the BC CDC Ecosystem Explorer shows several provincially or federally listed vascular plants, non-vascular plants and lichen have the potential to exist within the Project Area. The highlighted species are shown in Table 8.1-4.

TABLE 8.1-4 FEDERALLY OR PROVINCIALLY LISTED SPECIES WITH POTENTIAL TO EXIST IN PROJECT AREA

Scientific Name	English Name	Provincial	BC List	Global	COSEWIC	SARA
Acroscyphus Sphaerophoroides	Mountain crab-eye	S2 (2019)	Red	GNR	SC	1-SC (2019)
Bidens Amplissima	Vancouver Island beggarticks	S3 (2019)	Blue	G3 (2016)	SC	1-SC (2003)
Brotherella Roellii	Roell's brotherella	S3? (2024)	Blue	G3 (2004)	E	1-E (2018)
Fissidens Pauperculus	Poor pocket moss	S1 (2024)	Red	G3? (2012)	E	1-E (2003)
Fuscopannaria Ahlneri	Corrugated crackers	S3 (2019)	Blue	G4G5 (2002)	-	-
Hippuris Tetraphylla	Four-leaved mare's-tail	S3? (2019)	Blue	G5 (2016)	-	-
Lobaria Retigera	Smoker's lung	S3 (2019)	Blue	GNR	T	1-T (2023)
Nephroma Isidiosum	Pebbled paw	S3 (2010)	Blue	G3G5 (2006)	-	-
Nephroma Occultum	Cryptic paw	S3 (2019)	Blue	G4 (2007)	T	1-SC (2007)
Peltigera Gowardii	Northwest waterfan	S2 (2019)	Red	G3G4 (2013)	SC	1-SC (2018)
Pinus Albicaulis	Whitebark pine	S2S3 (2019)	Blue	G3G4 (2020)	E	1-E (2012)
Potentilla Glaucophylla var. *Perdissecta*	Diverse-leaved cinquefoil	S4S5 (2021)	Yellow	G5T4 (1994)	-	-
Pseudocyphellaria Rainierensis	Oldgrowth specklebelly	S2S3 (2019)	Blue	G4 (2017)	SC	1-SC (2012)
Sclerophora Peronella	Frosted glass-whiskers	S1 (2002)	Red	G3G4 (2013)	DD	-
Scytinium Californicum	Midlife vinyl	S2S3 (2010)	Blue	GNR	-	-

Terrestrial surveys are underway to characterize baseline conditions and will include old growth forests, riparian ecosystems, wetland delineation and functional assessments, and plant species of interest surveys (including rare plants, invasive plants, and culturally important plants (e.g., harvestable plants)). TEM will be completed following fieldwork, and metal sampling will be conducted as part of the baseline dataset for proposed disturbance areas. These data will inform mitigation measures to limit effects of the Project, as required.

8.1.10 Geology, Soils, and Terrain

The Project is situated within the Tahtsa Ranges which represent a transitional zone between the rugged, predominantly plutonic Coast Mountains to the west and the rolling hill region of sedimentary and volcanic rocks that underlie the Interior Nechako Plateau to the east. The terrain surrounding the Berg resource area is predominantly mountainous, transitioning to more subdued landforms at lower elevations downslope of the deposit and further east toward Houston. Regional topography reflects a history of volcanic and sedimentary bedrock uplift followed by extensive sculpting by glacial ice during the most recent glaciations, which carved valleys, shaped ridgelines, and defined the present plateau landscape.

The Project Area lies on the lower slopes of Mt. Ney, with elevations ranging from approximately 1,500 m to 2,050 masl. The proposed mine access road is situated along the northern and eastern flanks of Mt. Ney, traversing elevations between 1,000 m and 1,200 masl.

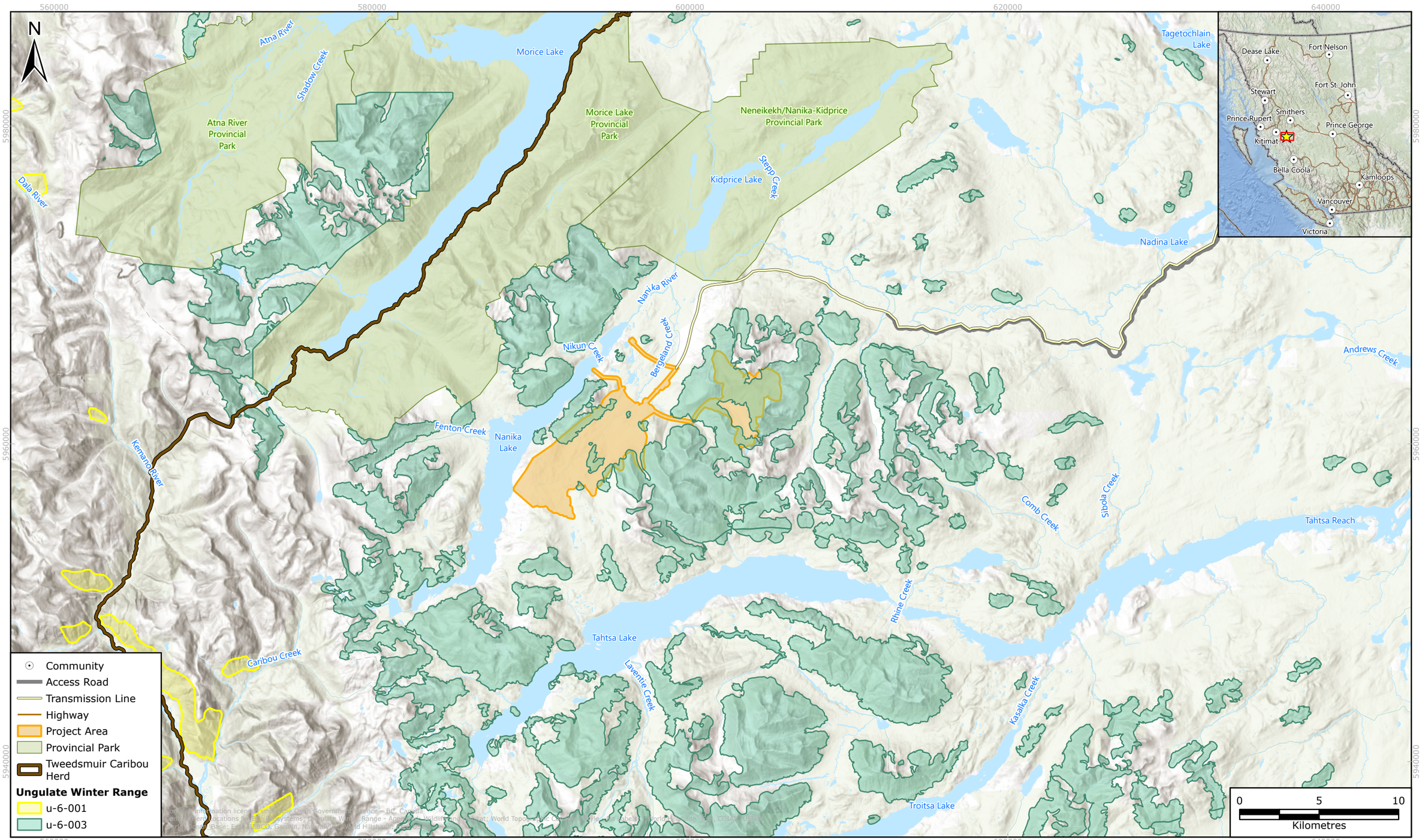
Desktop studies will be conducted to understand existing terrain and soil information, including unique geologic landforms. Soil and terrain fieldwork will include classifying soil, collecting soil quality and quantity information that meet reclamation and closure requirements, and collecting terrain stability and geohazard information in all areas of proposed disturbance. Soils and terrain mapping will be completed following fieldwork. These data will inform mitigation measures to limit effects of the Project on the environment, as required.

8.1.11 Wildlife and Wildlife Habitat

The Project Area contains habitat that supports a variety of wildlife terrestrial species. The Project has seen numerous years of visual occurrence and remote sensing camera monitoring as a confirmation of potential species within the area. Various species that have been confirmed include; grizzly bear, black bear, moose, marmot, mountain goat and wolverine. A detailed description of the existing conditions for wildlife and wildlife habitat will be completed for the EAC Application using a combination of available information and data collected from specific wildlife field surveys established for the Project. A two-year baseline program will be completed to support characterizing the existing condition for wildlife and wildlife habitat.

The Project is located in the western edge of the Local Population Unit for the Tweedsmuir caribou herd of southern mountain population (Figure 8.1-4). The Tweedsmuir-Entiako herd is listed as threatened on Schedule 1 of the federal *Species at Risk Act* (SARA; BC CDC 2026). The mineral resource area and open pit fall partially within the ungulate winter range (UWR) U-6-003 established for mountain goat. The remaining portions of the Project Area footprint fall at lower elevations and are outside of the UWR.

FIGURE 8.1-4 CARIBOU HABITAT AND WINTER RANGE MAP



ERM

CLIENT: SURGE COPPER
GIS NUMBER: BERG-15-014-04

DATE: 08/27/2026

PROJECTION: NAD 1983 UTM Zone 9N
SCALE: 1:225,000 when printed at 11x17

Project-specific habitat suitability modelling will be completed, including field validation, to support characterizing the existing condition for caribou and caribou habitat and to understand potential Project effects. A subset of cameras and pellet count transects will be set up to support characterizing the existing conditions at a regional level and support habitat suitability model validation. These data will inform mitigation measures to reduce potential effects of the Project on the environment.

Within the Project footprint there is potential for the occurrence of federally and provincially listed wildlife. A search of the CDC BC Species & Ecosystems Explorer showed several specific species that are known or have potential to exist within the general Project footprint. The indicated species are shown in Table 8.1-5.

TABLE 8.1-5 LISTED WILDLIFE SPECIES WITH THE POTENTIAL TO OCCUR IN THE PROJECT AREA

Scientific Name	Common Name	Provincial Status		Federal Status	
		BC Rank[1]	BC List[2]	COSEWIC[3]	SARA[4]
Amphibians					
Anaxyrus boreas	Western Toad	S4 (2022)	Yellow	SC	1-SC (2018)
Aneides vagrans	Wandering Salamander	S3 (2022)	Blue	SC	1-SC (2018)
Ascaphus truei	Coastal Tailed Frog	S4 (2022)	Yellow	SC	1-SC (2003)
Rana aurora	Northern Red-Legged Frog	S3 (2022)	Blue	SC	1-SC (2005)
Birds					
Accipiter atricapillus laingi	American Goshawk, *Laingi* Subspecies	S2 (2010)	Red	T	1-T (2003)
Ardea herodias fannini	Great Blue Heron, *Fannini* Subspecies	Blue	G5T4 (2016)	SC	1-SC (2010)
Asio flammeus	Short-Eared Owl	Blue	G5 (2016)	T	1-SC (2012)
Brachyramphus marmoratus	Marbled Murrelet	Blue	G3 (2016)	T	1-T (2003)
Chordeiles minor	Common Nighthawk	S3S5B (2022)	Blue	SC	1-SC (2023)
Coccothraustes vespertinus	Evening Grosbeak	S5 (2022)	Yellow	SC	1-SC (2019)
Contopus cooperi	Olive-Sided Flycatcher	S4B (2022)	Yellow	SC	1-SC (2023)
Cypseloides niger	Black Swift	S2S4B (2022)	Blue	E	1-E (2019)
Euphagus carolinus	Rusty Blackbird	S3S4B (2015)	Blue	SC	1-SC (2009)
Falco peregrinus	Peregrine Falcon	S3 (2015)	No Status	SC	1-SC
Falco peregrinus pealei	Peregrine Falcon, *Pealei* Subspecies	S3S4 (2019)	Blue	SC	1-SC (2003)
Hirundo rustica	Barn Swallow	S4B (2022)	Yellow	SC	1-T (2017)

Scientific Name	Common Name	Provincial Status		Federal Status	
		BC Rank[1]	BC List[2]	COSEWIC[3]	SARA[4]
Birds (cont'd)					
Oreoscoptes montanus	Sage Thrasher	S1B (2022)	Red	E	1-E (2003)
Patagioenas fasciata	Band-Tailed Pigeon	S3S4 (2022)	Blue	SC	1-SC (2011)
Phalaropus lobatus	Red-Necked Phalarope	S3B, SNRM (2023)	Blue	SC	1-SC (2019)
Mammals					
Gulo gulo	Wolverine	S3 (2015)	Blue	SC	1-SC (2018)
Lasiurus cinereus	Hoary Bat	S2S3 (2022)	Blue	E	-
Myotis lucifugus	Little Brown Myotis	S3S4 (2022)	Blue	E	1-E (2014)
Myotis septentrionalis	Northern Myotis	S2S3 (2022)	Blue	E	1-E (2014)
Lasionycteris noctivagans	Silver-Haired Bat	S4S5 (2022)	Yellow	E	-
Rangifer tarandus	Caribou (Southern Mountain Population)	S2S3 (2017)	Blue	SC	1-SC (2005)
Ursus arctos	Grizzly Bear	S3? (2015)	Blue	SC	1-SC (2018)

Notes:
BC = British Columbia; CDC = Conservation Data Centre; COSEWIC = Committee on the Status of Endangered Wildlife in Canada; ND = no data; SARA = *Species at Risk Act*
[1] BC Provincial Status: S1 = critically imperilled, S2 = imperilled, S3 = special concern, vulnerable to extirpation or extinction, S4 = apparently secure, S5 = demonstrably widespread, abundant, and secure, NA = not applicable, NR = unranked, SU = unrankable, ? = inexact or uncertain numeric rank (BC CDC 2024).
[2] BC List Status: Red = extirpated, endangered, or threatened; Blue = special concern; Yellow = not at risk (BC CDC 2024).
[3] COSEWIC Assessment Status: E = endangered; T = threatened; SC = special concern; NAR = not at risk; NA = non-active; DD = data deficient (Government of Canada 2025).
[4] Schedule 1 of SARA listing: E = endangered; T = threatened; SC = special concern (Government of Canada 2025).

9. Human Environment

The Project is located within the RDBN (population 37,737; Statistics Canada 2021 Census of Population data), and the closest municipality to the Project is Houston.

9.1 Relevant Plans, Studies, or Regional Assessments

The Project lies within the Morice Land and Resource Management Plan (LRMP) 2007. This LRMP encompasses approximately 1.5 million hectares in central northwestern BC. The plan reflects the outcomes of a two-year sector-based negotiation process that involved representation by 15 public and provincial government sectors and two First Nations. This process resulted in consensus agreement on a set of recommendations for the sustainable management of Crown land and resources for the plan area.

The Morice LRMP process was undertaken to provide greater certainty for local economic development and the long-term sustainability of ecological values. This plan was prepared with the aim of balancing the economic, environmental and social interests within the planning area in consideration of the wider regional and provincial setting. Goals for the LRMP are stated to include:

- Diverse cultural values are respected, and shared values are recognized;
- Issues relating to First Nations processes on rights and title to be respected;
- Healthy air, water, and soil;
- Stable access to a sustainable supply of natural resources;
- Profitable investment opportunities;
- A diverse economy supporting an increase in value-added processing;
- Resource management and manufacturing that maximizes local benefits;
- Opportunities for diverse jobs and lifestyles;
- Development that honours and respects the land, ecosystems and communities;
- Safe communities where citizens can live, work and recreate;
- Harmonious and integrated use of the landscape among different users;
- Optimal social and economic value from utilization of natural resources;
- Opportunities for future generations to learn from living on the land;
- Local public participation in resource management decisions; and
- Continual improvement through monitoring and adaptive management.

Two areas considered protected within the LRMP are Nadina Mountain and the Kidprice Lake chain and are approximately 50 km and 10 km respectively from the Berg Copper Project resource area, but do not overlap with the Project or Project footprint.

It is Surge's opinion that each of the goals and vision statement objectives can be met through the responsible development of the Berg Copper Project.

Surge has not identified sufficiently recent EAs, monitoring reports or other regional studies that would support the understanding of the existing human environment conditions. Surge is not aware of Indigenous land use plans that overlap with the Project Area but continues to engage with First Nations to identify any relevant land use planning initiatives that may be applicable to the Project. It is expected that additional baseline data on human environmental conditions and land use will be collected from a variety of sources to inform the EA and Project planning.

9.2 Non-Traditional Land Use and Tenure

The area surrounding the Project is relatively distant from many of the residents and sees limited use. Most of the Land and Resource use surrounding the Project includes outdoor recreation such as snowmobiling, fishing, all-terrain vehicle riding, hunting, camping, hiking and skiing. There is a known canoe route ending at Kidprice Lake, and the Burns Lake Snowmobile Club owns and operates a cabin near the bottom of the current Berg access road, which Surge has provided nominal funds towards rehabilitating or improvements over the years. Additional engagement and assessment are expected to ensure regional users can continue use of these resources during the responsible development of the Project.

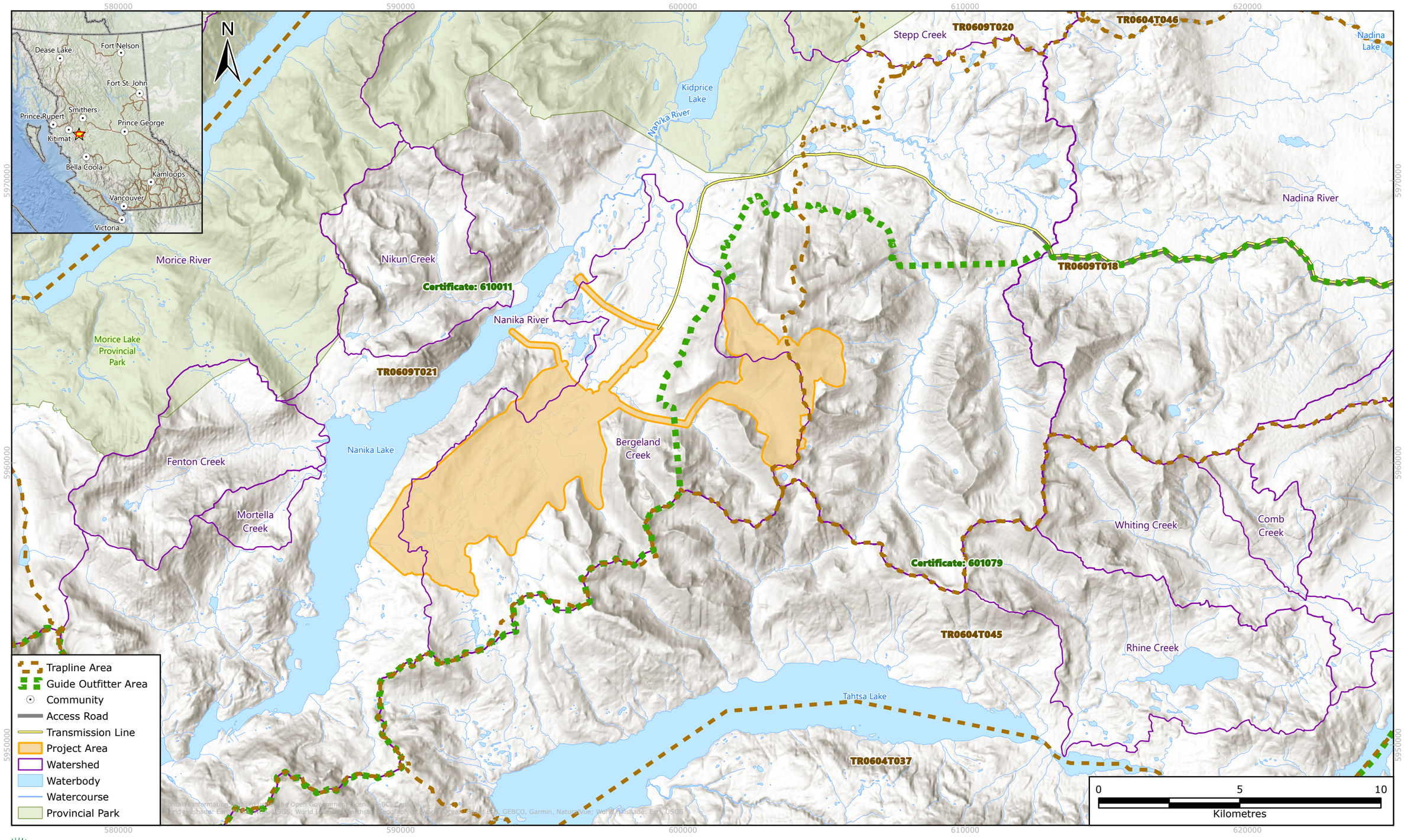
Surge has reviewed BC's land and resource registry to identify potentially affected landowners, tenure holders, land users and water users within the vicinity of the Project, as summarized in Table 9.2-1. Note that the Transmission Line Corridor includes a 250 metre buffer on either side of the centreline, and the final permitted transmission line area would be approximately 50 metres wide and in is anticipated to follow existing rights of way, so there will be fewer affected property owners and tenures holders than listed in the table below. The only tenures overlapped by the Project Area are two guide outfitters and two trapline certificates, shown on Figure 9.2-1. There are no active water licences in the Project Area, while the nearest active licence is located 17.2 km to the east, and 15 active water licences are overlapped by the Transmission Line Corridor.

TABLE 9.2-1 POTENTIALLY AFFECTED PROPERTY OWNERS AND TENURE HOLDERS

Type	Property or Tenure Description
Private Property	**Project Area–**None **Transmission Line Corridor–**103 private properties partially overlapped by the Transmission Line Corridor, with the majority located between Houston and the Telkwa substation
Agricultural Tenure	**Project Area–**None **Transmission Line Corridor–**Two Standard Lease agricultural tenures for grazing (236737, 135119) partially overlapped
Commercial Tenure	**Project Area–**None **Transmission Line Corridor–**Two Commercial Recreation Tenures, one Hunt Camp (6401326) and one Trapline Cabin (6402491) overlapped
Environment, Conservation, and Recreation Tenure	**Project Area–**One Crown Tenure Licence of Occupation Designated for Multiple Use Commercial Recreation (6409187) overlapped, and one Section 17 Designated Use Area for Fish and Wildlife Management (6409376) within 1 km of Project Area **Transmission Line Corridor–**One Section 16 Map Reserve for Fish and Wildlife (6405770) partially overlapped
Forestry Tenure	**Project Area–**One Occupant Licence to Cut held by Surge **Transmission Line Corridor–**13 Forest Tenure Harvesting Licences held by four different corporate entities (Pro-Tech Forest Resources Ltd., Canadian Forest Products Ltd., Coastal GasLink Pipeline Ltd., and Surge)
Guide Outfitter	**Project Area–**Two Guide Outfitter certificates partially overlapped (610032, 601079) **Transmission Line Corridor–**One additional Guide Outfitter certificate (601107) partially overlapped
Industrial Tenure	**Project Area–**None **Transmission Line Corridor–**One Licence of Occupation (6406870) for Light Industrial partially overlapped
Quarrying Tenure	**Project Area–**None **Transmission Line Corridor–**Two Section 16 Map Reserves for Sand and Gravel Quarrying (6401326, 6403654) overlapped, and one other (0283396) partially overlapped
Transportation / Right of Way	**Project Area–**None **Transmission Line Corridor–**Two Licence of Occupation for Roadway (6409000, 6408451), one Interim Licence Right-of-Way for Railway (6409621), and one Section 16 Map Reserve for Roadway (6405770) partially overlapped
Trapline Certificate	**Project Area–**Two Trapline Areas (TR0609T021, TR0609T018) partially overlapped **Transmission Line Corridor–**Nine additional Trapline Areas are partially overlapped
Utility / Right of Way	**Project Area–**None **Transmission Line Corridor–**Four existing Licence of Occupation for Electric Power Line, and one Statutory Right-of-Way for Electric Power Line (0337545) and one for Gas and Oil Pipeline (9708371) partially overlapped
Water Rights Licence	**Project Area–**None **Transmission Line Corridor–**15 active Water Licences overlapped

Note:
Project Area includes a 1 km area around the Project Area and noted where relevant, Transmission Line Corridor includes 250 m area on each side of proposed route.

FIGURE 9.2-1 REGISTERED TRAPLINES AND GUIDING TERRITORY CERTIFICATES IN THE VICINITY OF THE PROJECT AREA



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ERM

CLIENT: SURGE COPPER
GIS NUMBER: BERG-11-001-01

DATE: 08/27/2026

PROJECTION: NAD 1983 UTM Zone 9N
SCALE: 1:125,000 when printed at 11x17

9.3 Parks and Protected Areas

There are no federal, provincial, or regional parks directly adjacent to the Project Area. The following parks are within 25 km of the Project Area (edge to edge distances) and will be considered during the assessment process:

- Morice Lake Provincial Park is approximately 5 km from the Project Area.
- Nenikëkh /Nanika-Kidprice Park sits directly adjacent to the Morice Lake Provincial Park. Nenikëkh /Nanika-Kidprice Park is approximately 4 km from the Project Area.
- Atna Provincial Park is approximately 21 km from the Project Area.
- Sweeny Lake (West) Recreation site is approximately 21 km the Project Area.
- Sweeny Lake (East) Recreation site is approximately 16 km from the Project Area.
- Twinkle Lake Recreation site is approximately 21 km from the Project Area. Twinkle Lake Recreation site is also in proximity of the Huckleberry Mine (approximately 22 km in a straight line).
- The proposed Transmission Line route is located within 10 km of Nenikëkh /Nanika-Kidprice Park, Morice Lake Provincial Park, Nadina Mountain Park, and Morice River Ecological Reserve.

9.4 Local Economy

The Project is located within the RDBN, a resource-based region where forestry, mining, agriculture, transportation, public services, and tourism contribute significantly to the local economy (Regional District of Bulkley-Nechako 2026; Trade and Invest BC 2025). Communities including Burns Lake, Houston, Fraser Lake, Smithers, and Vanderhoof have historically relied on natural resource industries and continue to provide regional services, labour, and business support throughout north-central BC.

The regional economy benefits from key transportation infrastructure, including Highway 16, the CN Railway corridor, and regional airports located in Smithers and Prince George. These transportation networks facilitate the movement of workers, equipment, goods, and natural resources and have enabled the development and growth of forestry, mining, agriculture, tourism, and other resource-based industries throughout north-central BC.

Forestry has historically been a major economic driver within the region; however, the sector has experienced significant challenges in recent years due to reduced timber supply associated with mountain pine beetle impacts, wildfire disturbance, harvest constraints, and changing market conditions (CBC News 2023a). These challenges have contributed to sawmill curtailments, temporary shutdowns, and permanent closures throughout the region, including the closure and redevelopment of Canfor's Houston sawmill in 2023 and the closure of West Fraser's Fraser Lake sawmill in 2024 (CBC News 2023b; My Bulkley Lakes Now 2024). The resulting reduction in forestry employment has increased regional interest in economic diversification and alternative employment opportunities throughout the region.

Mining continues to be an important contributor to the economy providing employment and contracting opportunities throughout the region. Existing, historical, and proposed mining developments in the broader region include the Huckleberry Mine, Endako Mine both on care and maintenance, and the proposed Tenas Project near Telkwa (Telkwa Mining Ltd. 2025). Existing and historical projects contribute to a workforce with experience in construction, resource extraction, camp operations, environmental management, heavy equipment operation, and other industrial activities. The region also supports a network of contractors, suppliers, transportation providers, accommodation operators, and professional services that have experience supporting remote and camp-based industrial projects throughout northern BC.

Agriculture also contributes to the regional economy, particularly within the Bulkley Valley and Lakes District where cattle ranching, forage production, and crop cultivation occur (BC Agriculture in the Classroom Foundation 2020). Tourism and outdoor recreation are increasingly important sectors within the region, with activities such as fishing, hunting, hiking, mountain biking, snowmobiling, and skiing supporting local businesses and community economies (Trade and Invest BC 2025).

The recent decline in forestry employment throughout portions of the region highlights the importance of economic diversification and sustainable long-term employment opportunities (Canadian Centre for Policy Alternatives 2023). As planning for the Project advances, future studies will assess potential employment, business, procurement, training, and economic development opportunities associated with the Berg Copper Project, including opportunities that may benefit communities experiencing economic transition.

9.4.1 Workforce and Demographics

The nearest population centres are profiled in Table 9.4-1, and include Burns Lake, Fraser Lake, Houston, Vanderhoof, and Smithers. Prince George is included, as it is also considered a major northern BC supply centre and transportation hub. Additionally, several First Nation communities in exist in the area, as described in Section 6.

These communities have historically supported forestry, mining, agriculture, transportation, tourism, and public sector employment, providing an experienced regional labour pool with transferable skills applicable to construction, operations, maintenance, environmental monitoring, and other resource sector activities (Trade and Invest BC 2025). The demographics of both these municipalities and First Nation communities in the area will be further explored as part of the socio-economic baseline study.

TABLE 9.4-1 MUNICIPALITIES IN PROXIMITY TO THE PROJECT

Community	Population (2021)	Approximate Distance from Project	Other Location Details
Regional District of Bulkley-Nechako	37,737	Encompasses Project Area	Regional government area containing the Project and communities that may provide labour, services, accommodations, contractors, and supply-chain support to the Project. In 2021, the active labour force across the district was 19,050, with 12.0% employed in agriculture, forestry, fishing and hunting, 3.2% in mining, quarrying, and oil and gas industries, and an unemployment rate of 10.2%.
Burns Lake	1,659	~116 km NE	Closest municipality to the Project and likely location for workforce, supplies, accommodations, and services. In 2021, the community had an active labour force of 855 people, of which 7% were employed in agriculture, forestry, fishing and hunting, 2% in mining, quarrying, and oil and gas industries, and 7.3% were unemployed.
Fraser Lake	965	~170 km E	Regional service community along Highway 16 with historical ties to forestry and mining industries. In 2021, the community had an active labour force of 445 people, of which 7.9% were employed in agriculture, forestry, fishing and hunting, 10.1% in mining, quarrying, and oil and gas industries, and 12.4% were unemployed.
Houston	3,159	~80 km NE	Regional service and transportation hub with an experienced resource-sector workforce. In 2021, the community had an active labour force of 1,655 people, of which 7.9% were employed in agriculture, forestry, fishing and hunting, 3.6%in mining, quarrying, and oil and gas industries, and 12.7% were unemployed.
Vanderhoof	4,346	~224 km E	Important regional service centre supporting mining, forestry, transportation, and agriculture industries. In 2021, the community had an active labour force of 2,250 people, of which 8.9% were employed in agriculture, forestry, fishing and hunting, 1.3% in mining, quarrying, and oil and gas industries, and 8.2% were unemployed.
Smithers	5,378	~107 km N	Largest community in proximity to the Project; regional centre for government services, healthcare, transportation, mining support services, and commercial aviation. In 2021, the community had an active labour force of 3,020 people, of which 3.0% were employed in agriculture, forestry, fishing and hunting, 3.8% in mining, quarrying, and oil and gas industries, and 6.0% were unemployed.
Prince George	76,708	~306 km E	Major northern BC supply centre and transportation hub providing specialized services, equipment suppliers, contractors, and commercial air access. In 2021, the community had an active labour force of 41,275 people, of which 3.1% were employed in agriculture, forestry, fishing and hunting, 1.1% in mining, quarrying, and oil and gas industries, and 9.4% were unemployed.

Community	Population (2021)	Approximate Distance from Project	Other Location Details
Telkwa	1,474	~100km N	Village located near Smithers at the confluence of the Bulkley and Telkwa rivers and likely to provide workforce, services, accommodations, and suppliers for the Project. In 2021, the community had an active labour force of ~730 people and an unemployment rate of 5.4%. The population increased by 11.1% between 2016 and 2021, indicating continued community growth within the Bulkley Valley region.

Sources: Statistics Canada 2021 Census of Population; Google Maps distance estimates; RDBN.

Additional analysis of primary and secondary data will be conducted to further characterize the existing economic profile of the region, including the regional workforce capacity, labour market conditions, and economic development initiatives and priorities. This more detailed analysis will support Surge achieving its objective of sourcing at least 50% of the workforce from the local and regional area. Appropriate mitigation and enhancement measures will be identified to maximize employment, business, and training benefits while managing potential adverse socio-economic effects on regional labour markets, communities, and First Nations.

9.5 Health and Community Well-Being

9.5.1 Health and Community Services

The Project is located within the Northern Health region, with Houston and Smithers serving as the primary service centres for area residents and workers. Northern Health provides a range of health care and support services throughout the region, including hospital care, primary care, public health programs, mental health and substance use services, home and community care, and emergency health services (Northern Health 2026).

Houston is the nearest municipality, located 80 km north-east of the Project Area (approximately 116 km by road), and offers a range of local services, including primary health care, emergency services, schools, recreation facilities, and municipal infrastructure. Smithers, located 110 km north-west of the Project Area (approximately 200 km by road), serves as the region's principal service hub, providing a broader range of health, education, commercial, government, and professional services. Health care services in Smithers include the Bulkley Valley District Hospital, physician clinics, mental health and substance use supports, and specialist services for residents of the Bulkley-Nechako region. Emergency response services are available throughout the area, including police, fire protection, ambulance services, and search and rescue organizations.

The Project is also located within the Northern Region of the First Nations Health Authority (FNHA), which supports the delivery of First Nations health programs and services in partnership with communities, Northern Health, and BC. FNHA programs focus on health promotion, disease

prevention, primary care, mental wellness, environmental health, and other community-based services that support Indigenous health and well-being (FNHA 2026).

A preliminary review of regional health and community conditions indicates that many rural and northern communities in BC experience challenges related to health service access, workforce availability, housing affordability, and substance use. The BC Coroners service reports that Northern Health maintains the highest rate of unregulated drug deaths among all of BC's health authorities, at 49 deaths per 100,000 individuals (BC Coroners Service 2026). Existing health, social, and community conditions, including social determinants of health and barriers to accessing services among Indigenous and non-Indigenous populations, will be examined further as part of future baseline studies.

The Project may result in broader socio-economic and community well-being effects associated with workforce in-migration and increased demand for housing, services, infrastructure, and emergency response capacity in nearby communities. The assessment will consider potential effects on community well-being, mental health, community safety, social cohesion, food security, and access to traditional activities and community services. Particular attention will be given to the potential for disproportionate effects on First Nations, women, youth, Elders, and other potentially vulnerable groups, including effects on housing, community capacity, cultural continuity, and access to health and social services. A Gender-Based Analysis Plus (GBA Plus) lens will be incorporated, as appropriate, to help understand how Project effects and benefits may be experienced by different population groups. Additionally, gender-based violence risks and considerations for community well-being will also be considered in the assessment.

9.5.1.1 Human Health Risk Assessment

In support of the EAC Application a HHRA will be undertake. It will be informed by the British Columbia Guidance for Prospective Human Health Risk Assessment (Government of BC 2022) and Health Canada's Guidance for Evaluating Human Health Effects in Impact Assessment: Human Health Risk Assessment (Government of Canada 2023) and supported by accurate, current health data that will be inclusive of ancillary service data such as mental health and social services. As part of the HHRA, all Project components or activities that may interact with human health will identify potential effects and mitigations. Further, all contaminants of potential concern, including metals, dioxins/furans, VOCs, PAHs, and emissions from operations will be identified and assessed. Potential exposure pathways, including inhalation, ingestion of water and country foods, and other identified exposure routes, will be evaluated for workers, traditional land users, local communities and other receptors. The assessment will consider potential effects on air quality, drinking water sources, traditional food resources, and human health, including cumulative exposures where appropriate. The baseline information will capture existing conditions as well consider impacts of placing workforce in a highly mineralized area. Appropriate mitigation measures will be identified to avoid or reduce potential adverse health effects.

9.6 Heritage Resources

A single Chance Find occurred at the Berg Copper Project during a mapping traverse in the Tahtsa/Serenity area of the Berg property on August 7, 2016, an obsidian arrowhead was discovered along a ridgeline crest located at 602625E, 5957257N, NAD83 Zone 9 and approximately 1,800 m elevation. Upon discovery of the arrowhead, the ridgeline area was searched for other artifacts, however no additional artifacts were found. The area was left undisturbed and the location of the arrowhead was marked in the field by lime-green flagging tape.

It is expected that an Archaeological Overview Assessment (AOA) and an Archaeological Impact Assessment will be conducted as part of the assessment process and Surge will engage with relevant First Nations to ensure sufficient detail and direction are given to inform this study.

10. Potential Effects of the Project

The potential effects of the Project on the environmental, economic, social, heritage, and human health components of the environment will be comprehensively assessed in the EAC Application. The assessment will focus on specific VCs identified through collaboration with the OW, Witset, WFN, CCN, Skin Tyee Nation, NTB, the EAO, the IAAC, government agencies, and the public during and following the Early Engagement phase.

The assessment of potential effects will include consideration of mitigation measures and plans to avoid, reduce, rehabilitate, or offset adverse impacts; residual and cumulative effects; and reasonably foreseeable developments. The selection and scoping of VCs will be finalized through the EA process in consultation with Participating First Nations and government agencies.

A preliminary list of potential Project effects organized by environment component is presented in Table 10-1 below. This table reflects the early-stage nature of the Project design and is intended as a starting point for scoping discussions during Early Engagement. It does not represent the final list of VCs or an assessment of significance. Effects specific to a copper-molybdenum open pit mine in the Morice River watershed, including molybdenum water quality, ARD, selenium leaching, effects on the Skeena salmon system, and cumulative landscape effects, have been identified based on conversations to date with First Nations leaders across the above-listed communities, as well as analogous BC projects, including the FPX Nickel Baptiste Project IPD (ERM Consultants Canada 2026; January 2026), the Yellowhead Copper Project IPD (SLR Consulting Canada Ltd. 2025; June 2025), and technical guidance for the Morice watershed.

TABLE 10-1 PRELIMINARY POTENTIAL PROJECT EFFECTS BY COMPONENT

Component	Potential Effects	Example Management Approach
Physical Environment		
Air Quality	• Fugitive dust emissions from blasting, open pit operations, haul road vehicle traffic, primary crusher, ore and waste rock handling, stockpile wind erosion, and tailings beach drying can increase ambient particulate matter (TSP, $PM_{2.5}$ and PM_{10}) concentrations, affecting human health, wildlife, and vegetation. • Combustion emissions from the diesel mining fleet (haul trucks, drills, excavators), backup generators, and propane heating sources will contribute NO_2, SO_2, CO, VOCs, and fine particulate to ambient air quality in the Project Area. • Blasting generates oxides of nitrogen (NOx), carbon monoxide (CO), and dust plumes; in adverse meteorological conditions (temperature inversions, low wind speeds typical of the Tahtsa Ranges) emissions may concentrate in valley bottoms near the Project and along haul corridors. • Dust deposition on soils and vegetation can alter soil chemistry, potentially increasing metal uptake in plants consumed by wildlife and humans (particularly relevant for copper and molybdenum species present in the ore body). • Greenhouse gas (GHG) emissions—estimated at approximately 3,357 kt CO_2e over the 28-year operations phase (~111.5 kt CO_2e/yr)—will contribute to provincial and national GHG inventories, with diesel haul trucks as the primary source pending electrification of the mining fleet. • The overland conveyor system (replacing direct haul-to-mill truck traffic) materially reduces mobile combustion emissions relative to conventional mine layouts; this design choice is a key GHG mitigation already reflected in the Project design. • Dust from the mine site may be transported to Nanika Lake (proposed freshwater supply), nearby provincial parks (Morice Lake, Nenikëkh/Nanika-Kidprice), and First Nations traditional use areas during high-wind events potentially reducing the quality of traditional harvesting areas, raising concerns regarding the consumption of traditional foods, or reduced enjoyment and cultural use of harvesting areas.	• Reduce vegetation clearing during Project design by optimizing infrastructure layouts, co-locating facilities, using previously disturbed areas and existing linear corridors where feasible, and implementing progressive revegetation as soon as practical. • Control particulate emissions with cyclones, baghouses, air scrubbers, or other technologies identified through the Best Achievable Technology Assessment. • Reduce GHG emissions by operating Project vehicles and equipment efficiently and using low-emission technologies, including electric and hybrid vehicles, where feasible. • Stabilize and revegetate soil stockpiles to reduce erosion and fugitive dust generation. • Implement dust suppression measures, such as watering haul roads, applying suitable dust suppressants or crusting agents, and reducing vehicle speeds where appropriate. • Increase electrification and energy efficiency by utilizing electric equipment and building heating systems where feasible and implementing energy conservation measures. • Use grid-supplied electrical power where available to reduce the need for onsite fossil fuel-powered generation. • Use in-pit waste rock disposal where feasible to reduce the Project footprint and associated land clearing requirements. • Prioritize low-carbon transportation options for personnel, supplies, and products by selecting high-efficiency, lower-GHG-intensity transportation methods where practical. • Develop and implement an Air Quality and Fugitive Dust Management Plan to monitor and manage emissions throughout Project construction and operations.
Noise and Vibration	• Open pit mining operations—including drilling, blasting, shovel loading, haul trucks, and the primary crusher—will generate elevated noise levels during operations (24/7 over 28 years), which may affect wildlife receptors in the surrounding alpine and sub-alpine habitat. • Blasting generates ground vibration and air overpressure (airblast) that can affect geotechnical stability of pit walls and TWMF embankments and may disturb wildlife and First Nations users of the surrounding landscape. • The overland conveyor and processing plant will generate continuous mechanical noise and vibration; conveyor idler noise is a known nuisance in similar operations. • Concentrate loadout operations and increased heavy truck traffic on the Morice FSR and Sibola FSR will increase noise levels along a corridor used by wildlife (ungulates, bears, wolves) and by First Nations for traditional harvesting. • Noise from the Project in a currently quiet wilderness setting may alter wildlife behaviour, including movement patterns of grizzly bears, moose, caribou, and wolves, particularly during calving and denning periods. • Although the Project is in a remote location with no permanent human residents within the direct noise envelope, First Nations members and recreational users in the area (hunters, anglers, snowmobilers) may experience decreased acoustic quality in traditionally used areas.	• Use noise-reducing equipment and technologies where feasible to reduce noise emissions. • Install engineering noise controls on equipment, such as mufflers, acoustic enclosures, buildings, and air intake treatments. • Maintain equipment regularly to ensure optimal performance and reduce noise generation, including replacing worn components and lubricating moving parts as required. • Enclose stationary equipment or construct berms and acoustic barriers where appropriate to reduce noise propagation. • Incorporate vibration considerations into geotechnical design, where required, and assess potential vibration effects as part of geotechnical stability evaluations. • Apply best management practices for blasting and vibration control, particularly in areas near fish and fish habitat. • Develop and implement a Noise and Vibration Management Plan to monitor, manage, and mitigate Project-related noise and vibration during construction and operations.

Component	Potential Effects	Example Management Approach
Physical Environment *(cont'd)*		
Geology, Soils, and Terrain	Changes to Soil Quantity: • Vegetation removal, topsoil stripping, overburden excavation, and waste rock placement will result in permanent loss and alteration of soils across the Project footprint (~1,165 ha TWMF; ~400 ha open pit; ~180 ha waste rock dumps; ~20 ha process plant; ancillary facilities). Changes to Soil Quality: • Long-term storage of stripped topsoil in stockpiles may degrade soil structure and biological activity, reduce success of future revegetation and reclamation unless managed carefully (e.g., seeding, inoculation, limited storage period). • Compaction and de-vegetation of haul roads, laydown areas, and camp pads reduce soil infiltration capacity, increases runoff, and can initiate erosion and gully formation, contributing sediment to nearby watercourses. • Post-closure, long-term storage of PAG waste rock and tailings within the TWMF requires engineered containment and monitoring to prevent soil and terrain degradation extending beyond the Project footprint. Changes to Terrain and Terrain Stability: • The open pit will alter topography and terrain permanently; final pit dimensions will create a large, engineered landform that will require long-term monitoring and management post-closure (pit lake development, slope stability). • Terrain in the Project Area includes steep mountain slopes, alpine meadows, and valley bottoms subject to snow avalanche, debris flow, and rock fall hazards; these natural hazard conditions must be integrated into infrastructure siting and design.	• Implement soil salvage, stockpiling, and placement procedures to conserve soil resources and maintain soil quality for reclamation. • Develop and implement an Erosion and Sediment Control Plan to reduce soil loss, erosion, and sediment transport during all Project phases. • Develop and implement a Soil Management Plan and Reclamation and Closure Plan that incorporates soil salvage strategies, soil handling requirements, progressive reclamation measures, and targeted end land use objectives.
Groundwater	• Dewatering of the open pit will lower the local groundwater table, potentially affecting groundwater flow direction, groundwater-dependent ecosystems (springs, wetlands, riparian areas), and existing water uses in the Project Area. • Infiltration of seepage through waste rock stockpiles containing PAG material may mobilize metals (copper, molybdenum, selenium, arsenic, zinc, nickel) and acidity into the shallow groundwater system, threatening downgradient surface water quality. • TWMF seepage—including tailings porewater containing process water, reagents, and dissolved metals—represents a long-term risk to groundwater quality; the extent of seepage depends on liner design, embankment permeability, and the effectiveness of seepage collection systems. • Chemical interactions between process plant effluent, contact water ponds, and the local groundwater regime may alter shallow aquifer chemistry along the Berg Creek and Bergeland Creek corridors. • Subaqueous storage of PAG waste rock within the TWMF (to prevent acid generation) requires a stable, permanent water cover; loss of water cover (drought, dam breach, or operational drawdown) risks re-exposure and onset of ARD with subsequent groundwater contamination. • Groundwater monitoring boreholes, vibrating wire piezometers, and seepage collection infrastructure will be required throughout the mine life and post-closure to ensure early detection of contamination migration. • Freshwater supply for the Project (currently proposed from Nanika Lake via ~4,565 m pipeline) may interact with local groundwater and surface water budgets; confirmation of water licence availability and impacts on downstream users will be required.	• Implement groundwater management and monitoring programs throughout all Project phases to verify resource conditions, refine hydrogeological and water quality predictions, and inform adaptive management measures, including seepage control and management incorporated into Project design. • Develop and implement an Erosion and Sediment Control Plan to reduce erosion and prevent sediment discharge to receiving environments. • Increase recycling and reuse of contact water for process requirements to reduce withdrawals from non-contact water sources. • Apply best management practices, engineered containment systems, and monitoring programs for the storage, handling, and use of fuels, chemicals, and hazardous materials to prevent accidental spills and releases. • Develop and implement a Reclamation and Closure Plan, including a closure water management strategy, to support long-term land and water resource protection and achievement of post-closure land use objectives.

Component	Potential Effects	Example Management Approach
Physical Environment *(cont'd)*		
Hydrology and Surface Water Quality	• Construction and operation of the Project will alter runoff patterns, drainage areas, and peak flow magnitudes in the Berg Creek and Bergeland Creek sub-watersheds, which are tributaries of the Morice River—one of the most productive salmon rivers in northern BC and within the broader Skeena watershed. • Discharge of treated contact water (mine runoff, process water, TWMF return water) to receiving watercourses will introduce contaminants including total suspended solids (TSS), metals (copper, molybdenum, selenium, zinc, arsenic), low-pH water, and nutrients; concentrations must meet BC Water Quality Guidelines and MDMER Schedule 2 limits prior to release. • Molybdenum is of particular concern: the BC Water Quality Guideline for protection of aquatic life is 0.073 mg/L; copper porphyry deposits and tailings are known to leach elevated molybdenum, and effective treatment to meet this guideline in high-volume water discharges is technically challenging. • Selenium leaching from waste rock and tailings is a characteristic concern for porphyry copper deposits; selenium bioaccumulates in the food web and can cause reproductive failure in fish and aquatic birds at low concentrations (BC WQG: 1 µg/L dissolved). • ARD from PAG waste rock—preliminary characterized as ~86.7% PAG based on AMEC 2007 testwork—poses a long-term risk of low-pH, high-metal drainage to surface water if subaqueous containment or engineered covers are not maintained throughout closure. • Non-contact water diversion channels (~2,527 m total) will re-route clean upstream catchment runoff around mine infrastructure; diversion sizing, maintenance, and outlet protection must account for peak flow events (design criterion: 1:100-year flood). • Changes to seasonal flow regimes in Berg and Bergeland creeks—from altered infiltration, groundwater drawdown, water consumption, and diversion of catchment areas—may affect downstream flow availability for aquatic habitat, particularly during critical low-flow periods (August–September) coinciding with salmon migration. • Water balance modelling indicates an anticipated annual water surplus of approximately 365 m^3/hr under average conditions; this surplus contact water will require treatment and controlled release, with quality and quantity to be further defined through the EA. • Accidental spills of fuel, reagents (lime, fuel oil, sodium cyanide, PAX), and process fluids during construction, operations, and transport on the Morice FSR represent acute contamination risks to watercourses; spill response plans and secondary containment will be required.	• Integrate water stewardship throughout the mine life cycle, including designing for closure to reduce mine contact water generation and restore natural drainage patterns where feasible at the end of mine life. • Incorporate water management into reclamation and closure planning to achieve long-term hydrologic stability and protect downstream water quality. • Develop and implement a Surface Water Management Plan during construction, operations, closure, and post-closure to manage contact and non-contact water through diversion structures, sediment control measures, and flow attenuation systems. • Implement a Metal Leaching and Acid Rock Drainage (ML/ARD) Management Plan consistent with the BC *Mines Act*, Health, Safety and Reclamation Code (MCM 2026), applicable BC ML/ARD guidelines, and Mine Environment Neutral Drainage guidance to predict, monitor, and mitigate geochemical risks. • Characterize and manage the geochemical properties of mine materials (e.g., waste rock, tailings, and ore stockpiles) through static and kinetic testing programs to inform material handling, storage, and mitigation requirements. • Incorporate source control measures and engineered design features (e.g., tailings storage facilities, seepage collection systems, water management ponds, and treatment systems) to prevent or reduce impacts to surface water and groundwater quality. • Apply best management practices and engineered controls for the storage, handling, and use of fuels, chemicals, and other potentially hazardous materials to prevent accidental spills and releases. • Develop and maintain a site-wide water management system that supports a stable water balance and is resilient to extreme precipitation events, drought conditions, and climate change. • Implement comprehensive surface water and groundwater monitoring programs throughout all Project phases to detect, assess, and respond to changes in water quantity and quality. • Develop and implement a Closure and Post-Closure Plan that ensures the long-term protection of water quality and the physical and geotechnical stability of containment facilities. • Apply an adaptive management framework to refine mitigation measures and management strategies based on monitoring results, emerging information, and changing environmental or climatic conditions. • Incorporate Best Available/Best Achievable Technologies and practices into water management, treatment, and containment systems to reduce environmental effects and support continual improvement in water stewardship.

Component	Potential Effects	Example Management Approach
Biological Environment		
Fish and Fish Habitat / Aquatic Resources	• Direct loss or alteration of fish habitat will result from land clearing, stream crossings, diversion of watercourses, and placement of Project infrastructure within or adjacent to riparian and aquatic areas of Berg Creek, Bergeland Creek, and unnamed tributaries. • The Project is located within the Morice River watershed, a Class I designated watershed in BC and a tributary of the Skeena River—one of the most important wild salmon systems remaining on the Pacific Coast. Key salmon species present in the lower Morice system include Chinook salmon, coho salmon, sockeye salmon, and steelhead trout. • Changes to water quality from discharge of treated contact water and potential seepage could affect aquatic health through elevated metal concentrations (copper, molybdenum, selenium), altered pH, increased TSS, and changes to temperature and dissolved oxygen levels, affecting survival and reproduction of fish and benthic invertebrates. • Changes to stream flow regime (altered hydrology, groundwater drawdown) may reduce habitat suitability during critical life stages, including spawning (fall), egg incubation (winter), and juvenile rearing (summer), for fish species in Berg and Bergeland creeks. • Sediment inputs from construction activities, road building, stream crossings, and active mine operations (erosion from disturbed surfaces) can degrade spawning habitat through fine-sediment smothering of gravels in downstream reaches. • Bull trout *(Salvelinus confluentus*)—listed as a Species of Special Concern under SARA—are known to occupy cold, clear mountain streams; their sensitivity to fine sediment and thermal changes makes them a key indicator species for the Project. • Steelhead (*Oncorhynchus mykiss*) in the Morice-Skeena system are provincially designated as a species requiring special management and are critical to First Nations food, social, and ceremonial fisheries. • Reduced availability, quality, or accessibility of fish species used for food, social, ceremonial, and cultural purposes by First Nations, and effects on Indigenous stewardship responsibilities. • Changes in the amount, quality, and distribution of aquatic habitat for non-fish aquatic resources (benthic invertebrates, amphibians) resulting from water quality changes, flow alteration, and riparian disturbance.	• Avoid and reduce direct loss of aquatic habitat through Project siting and design, including selecting mine pit, waste rock storage, and associated infrastructure locations that avoid fish-bearing waterbodies and sensitive aquatic habitats wherever feasible. • Incorporate mitigation-by-design measures to reduce direct and indirect effects on aquatic ecosystems, including minimizing the Project footprint, maintaining natural drainage patterns, and reducing changes to instream flows and aquatic connectivity. • Implement best management practices and environmental protection plans, including fish-friendly stream crossings and water intakes, adherence to instream work standards and timing windows, perpendicular watercourse crossings where appropriate, and erosion and sediment control measures. • Collaborate with First Nations on aquatic stewardship initiatives and develop habitat enhancement, restoration, and offsetting measures to address unavoidable harmful alteration, disruption, or destruction of fish habitat. • Implement surface water quality management measures to protect aquatic ecosystems and maintain water quality during all phases of the Project. • Develop and implement Aquatic Effects Monitoring Programs to assess the effectiveness of mitigation measures, verify predictions, and support adaptive management to address observed environmental effects. • Apply an adaptive management framework to refine mitigation, monitoring, and habitat protection measures based on monitoring results, regulatory requirements, and Indigenous and stakeholder input.
Vegetation and Ecosystems	Changes to Vegetation and Ecosystems: • Loss of vegetation and ecosystems — including listed plants and ecological communities, culturally important plants, and sensitive ecosystems (e.g., alpine and parkland ecosystems)) — from land clearing, infrastructure development, and waste storage will result in permanent and temporary disturbance of the Project footprint. • Loss and fragmentation of wetlands and riparian vegetation within the Project Area will reduce ecosystem services (water filtration, carbon storage, flood attenuation and habitat connectivity for wildlife). • Whitebark pine (*Pinus albicaulis)*, a SARA-listed Endangered species, is known to occur in high-elevation areas of the Project; disturbance of whitebark pine habitat during construction and operations, and from dust deposition, requires a dedicated stewardship plan. Changes to Vegetation Quality: • Dust deposition from mine operations onto vegetation (particularly downwind of the open pit, crusher, and haul roads) may alter soil chemistry, inhibit photosynthesis, and affect the palatability and nutritional quality of forage for wildlife and traditional food plants. • Reclamation of disturbed areas during operations and closure will rely on the long-term viability of seed sources, soil conditions, and slope stability; reclamation success in high-elevation alpine terrain is uncertain and may take decades to achieve. • Introduction of invasive plant species via construction equipment, road disturbance, and soil movement represents a long-term risk to native plant communities in the Project Area and along the Morice FSR corridor. • Changes in vegetation cover associated with the transmission line and access road corridor may alter habitat connectivity and create edge effects over a linear footprint extending well beyond the mine site. • Loss or reduced availability of culturally important plants, medicines, berries, and other traditional-use species by First Nations resulting in potentially reduced opportunities for harvesting and knowledge transfer.	• Implement ecosystem and species management plans to avoid, reduce, and manage potential effects on biodiversity and ecological values throughout all Project phases. • Avoid and reduce interactions with sensitive ecosystems, species at risk, and other biodiversity values through Project siting, design, construction timing, and operational controls that reduce the extent, duration, and intensity of disturbances. • Design for closure by incorporating a returning land use vision and reclamation objectives, minimizing vegetation clearing with previously disturbed areas where feasible and implementing measures to prevent and manage invasive species establishment. • Reduce the overall mine footprint through progressive and interim reclamation, returning disturbed areas to productive ecological functions as early as practicable. • Protect sensitive vegetation communities and ecosystem function through mitigation-by-design measures, vegetation management plans, and soil conservation practices that maintain land capability for reclamation and support the re-establishment of native ecosystems. • Conserve soil quality and functionality to support successful reclamation, reduce the potential for contaminant uptake by vegetation, and promote long-term ecosystem health. • Collaborate with First Nations on stewardship and habitat enhancement initiatives to address unavoidable residual effects on species and ecosystems of concern, including species at risk such as Whitebark Pine. • Develop and implement a Reclamation and Closure Plan that incorporates clear end land use objectives, progressive reclamation measures, and long-term ecosystem restoration goals. • Implement an Air Quality and Dust Management Plan to reduce potential effects of airborne emissions on vegetation, wildlife, and ecological communities. • Implement a Stormwater Management Plan to control runoff, reduce erosion and sediment transport, and protect terrestrial and aquatic ecosystem functions. • Apply adaptive management principles to evaluate mitigation effectiveness and refine management measures based on monitoring results, Traditional Knowledge, and ongoing scientific assessment.

Component	Potential Effects	Example Management Approach
Biological Environment *(cont'd)*		
Wildlife and Wildlife Habitat	Potential Effects of the Project on Wildlife and Wildlife Habitat comprise four general categories, and are change in habitat, movement, mortality risk, and health. Change in Habitat that is the direct loss or alteration of wildlife habitat (e.g., land clearing) within the physical Project footprint and indirect loss or alteration of wildlife habitat (e.g., sensory disturbance, fragmentation and edge effects, altered surface water flows) that extends beyond the physical Project footprint. Potential effects on sensitive habitats include: • Woodland caribou (*Rangifer tarandus*) of the Tweedsmuir-Entiako herd is federally listed as Threatened (provincially Blue-listed) and the Project has the potential to interact with critical habitat, including high-elevation habitats. • Grizzly bear (*Ursus arctos*) and wolverine (*Gulo gulo*) are federally listed as Special Concern (provincially Blue-listed) and are broadly distributed and the Project has the potential to interact with habitats for both wide-ranging species, including high-elevation winter denning habitat. • Moose (*Alces alces*), marten (*Martes americana*), and lynx (*Lynx canadensis*) are common in the region and an important species to First Nations and habitat loss and alteration can affect the distribution and abundance of these species potentially requiring increased travel effort to access more abundant harvesting areas affecting traditional land use. • Bat habitat primarily includes summer roost habitat in large diameter mature trees and foraging areas (e.g., wetland and riparian areas) but overwintering hibernacula are unlikely to exist given the lack of karst topography that creates cave features. • Migratory birds, raptors, and other avian species use a variety of habitats during the breeding season. • Amphibians such as the western toad (*Anaxyrus boreas*) federally listed as Special Concern (principally Yellow-listed) may lose wetland breeding habitats and upland overwintering habitats. • **Change in Movement** that is the alteration of large-scale wildlife movement patterns or movement corridors. This can include effects on wide-ranging species such as woodland caribou, moose, grizzly bear, or wolverine, and near-ranging species such as western toad and is most often associated with the creation of physical (e.g., roads) and/or sensory (e.g., noise and light emissions) barriers. • **Change in Mortality Risk** that is the direct increase in mortality risk (e.g., land clearing activities, vehicular collisions, human–wildlife conflicts) and indirect increase in mortality risk (e.g., altered predator-prey dynamics, harvest pressure). A change in direct mortality risk is most likely to result from vehicle-wildlife collisions along the Morice and Sibola FSR because of increased traffic volume during the construction and operations phases. A change in indirect wildlife mortality is most likely to result from the creation or improvement of access to areas adjacent to the Project that were previously more isolated to hunters and predators. • **Change in Health** that is the exposure to contaminants or other emissions that may affect the health of wildlife and wildlife habitat, primarily from mine contact water and dust emissions.	• Design for closure by establishing a returning land use vision and reclamation strategy that supports the long-term re-establishment of self-sustaining, wildlife-supporting ecosystems. • Develop and implement collaborative wildlife and habitat management plans during Project design and operations that align with First Nations stewardship objectives and conservation initiatives. • Reduce human–wildlife interactions through effective waste management, traffic controls, reduced artificial lighting, wildlife-aware camp design, and worker education programs. • Implement a Reclamation and Closure Plan that incorporates clear end land use objectives, including restoration and enhancement of wildlife habitat. • Reduce habitat loss and fragmentation for migratory birds and wildlife by utilizing existing disturbed areas where feasible and undertaking progressive reclamation as early as practicable. • Schedule vegetation clearing and habitat alteration activities outside sensitive periods, including migratory bird nesting seasons, in accordance with applicable legislation and guidance. • Implement erosion and sediment control measures, including sediment retention structures and site stabilization practices, to protect wildlife habitat and ecosystem function. • Apply best management practices for wildlife protection and habitat conservation throughout all phases of the Project. • Develop and implement a Traffic Management Plan to reduce wildlife-vehicle collisions and reduce transportation-related disturbances to wildlife. • Implement wildlife-friendly lighting measures, including directional lighting, shielding, and reduced light intensity where appropriate, to reduce light pollution and disturbance to migratory birds, bats, and other nocturnal species. • Use wildlife deterrent systems and management measures where necessary to prevent wildlife access to hazardous areas, including waterbodies or facilities containing substances potentially harmful to wildlife. • Apply activity timing restrictions and seasonal work windows to avoid disturbance during sensitive wildlife periods, such as breeding, nesting, denning, and overwintering seasons. • Implement exclusion and access-control measures to prevent wildlife entry into active operations and other potentially hazardous Project Areas. • Develop and implement wildlife monitoring programs consistent with best available science and applicable standards to evaluate mitigation effectiveness and inform adaptive management. • Follow the mitigation hierarchy—avoid, reduce, restore, and offset—to reduce Project effects on wildlife and habitats and address residual impacts that cannot be avoided.

Component	Potential Effects	Example Management Approach
Social, Health, and Economic Environment		
Community Infrastructure and Services / Community Well-Being	• In-migration of construction and operations workforce (estimated peak construction workforce of [approximately 1,650]; peak operations workforce of [550]) may place pressure on housing supply, rental markets, health care services, schools, and community infrastructure in Houston, Burns Lake, Smithers, and Francois Lake communities. • Industrial camp operations and shift rotation schedules may create social disruption associated with the 'boom-bust' cycle of resource development, including increases in alcohol and substance use, domestic disruption, and associated social services demand in host communities. • The potential for disproportionate social impacts on First Nations communities—including effects on community cohesion, on-reserve housing pressures, and demand for social and health services—requires dedicated assessment including a Gender-Based Analysis Plus (GBA Plus) lens. • Surge's commitment to Local and Indigenous Employment policies, supplier diversity practices, and community investment programs may generate positive offsets to infrastructure pressure through economic benefits and improved community capacity. • The Project is in a region significantly affected by forestry sector decline (mill closures in Burns Lake, Houston, and Fraser Lake); the Project may provide important economic diversification and employment stability, with positive effects on community well-being and population retention. • Changes to community cohesion, sense of place, and cultural continuity for First Nations communities resulting from the industrialization of traditional territories and the associated social changes. • Adequacy of emergency response infrastructure (fire, police, ambulance, search and rescue) in the Project Area relative to increased worker population and industrial risk must be assessed; the nearest hospital (Bulkley Valley District Hospital in Smithers, ~200 km by road) has limited capacity relative to a major construction workforce.	• Collaborate with First Nations, local governments, service providers, and communities to plan for and manage potential effects on community well-being, public services, and infrastructure throughout the Project life cycle. • Work with local authorities and emergency service providers to anticipate and address increased demand for health, protective, emergency response, and community services. • Integrate GBA Plus into Project planning, engagement, monitoring, and decision-making to identify and address potential effects on different population groups. • Implement workforce training programs, including cultural awareness, anti-harassment, anti-violence, and respectful workplace practices, to promote safe and positive community interactions. • Establish workforce conduct policies and community support measures to mitigate risks related to gender-based violence and other adverse social effects. • Support local and Indigenous employment, training, and procurement opportunities, with targeted initiatives for underrepresented groups, including women and youth. • Implement employee health, safety, wellness, and assistance programs that support occupational health, mental well-being, financial literacy, and skills development. • Engage First Nations and local communities in closure and reclamation planning to ensure post-closure land uses align with community priorities and shared objectives. • Develop workforce transition strategies for closure, including retraining, career development, relocation, and other support programs. • Implement a Traffic Management Plan to promote community safety and reduce transportation-related impacts. • Apply community monitoring and adaptive management programs to evaluate social effects, measure mitigation effectiveness, and respond to emerging community concerns.
Human Health	• Changes to ambient particulate matter ($PM_{2.5}$ and PM_{10}) concentrations from fugitive dust and combustion emissions may increase respiratory health risks for workers and nearby community members, particularly those with pre-existing respiratory or cardiovascular conditions. • Dust deposition on soils and traditional food plants (berries, mushrooms, medicinal plants, root vegetables) may introduce trace metals (copper, molybdenum, selenium, arsenic) into the food chain, creating ingestion exposure pathways for First Nations and other country food users. • Changes to water quality in Berg and Bergeland creeks, and potentially the Morice River and its tributaries, may affect the quality and safety of water used for drinking, food preparation, and traditional food harvesting (fish, waterfowl) by First Nations communities. • Noise and vibration impacts on workers (occupational exposure) and on nearby traditional land users (interference with traditional activities, sleep disturbance in camps and communities) will be assessed under both occupational and community health frameworks. • The presence of a large workforce in a remote, high-mineral-geochemistry environment creates occupational health risks from exposure to copper and molybdenum-bearing dust during drilling, blasting, crushing, and ore handling operations. • Community mental health and social well-being impacts from rapid economic change, workforce in-migration, and transformation of traditional land may be significant; social determinants of health including housing, income security, cultural connection, and family stability are all potentially affected. • Increased traffic volumes on the Morice FSR may increase road traffic accident risks for community members and existing FSR users (forestry, recreation) sharing the road with mine haul trucks and heavy equipment. • A Human Health Risk Assessment (HHRA) will be prepared for the EAC Application consistent with the BC Guidance for Prospective Human Health Risk Assessments, including country food pathways, contaminants of potential concern (COPs), and cumulative health burdens.	• Develop and implement an Air Quality and Dust Management Plan to reduce emissions and protect the health of workers, nearby communities, and the environment. • Implement a Water Stewardship and Stormwater Management Plan to manage runoff, reduce erosion and sediment transport, and protect downstream water resources. • Develop and implement a Traffic Management Plan to enhance worker and public safety, reduce traffic-related impacts, and improve transportation efficiency. • Monitor worker exposure to airborne contaminants and dust and implement appropriate engineering controls, operational practices, and personal protective measures to reduce potential health risks associated with dust exposure.

Component	Potential Effects	Example Management Approach
Social, Health, and Economic Environment *(cont'd)*		
Employment and Economy	• The Project is anticipated to generate approximately 1650 direct jobs during construction and 550 direct jobs during operations. • Local and regional procurement of goods and services (food, fuel, equipment maintenance, environmental monitoring, reclamation, transportation) will create significant economic stimulus for businesses in Houston, Burns Lake, Smithers, and broader northwestern BC. • First Nations employment and contracting opportunities—including through existing partnerships with Yinka Dene Economic Development LP (YLP), CCN enterprises, and other Nation-affiliated businesses—represent a significant avenue for advancing reconciliation through economic participation. • The Project will generate provincial tax revenue (mineral tax, corporate income tax, property tax), royalties, and contributions to local government revenues over the 31-year mine life, supporting public services in the region. • Changes to traditional, non-wage economic activities—including hunting, trapping, fishing, gathering, and guiding—for First Nations members and other residents may result from altered wildlife habitat, access restrictions, and changes to the cultural landscape. • Positive gross domestic product contributions from concentrate export (copper and molybdenum concentrate) and multiplier effects on construction, professional services, and transportation sectors. • Post-closure economic impacts—particularly for communities that have become dependent on the mine for employment and tax revenue—require planning and transition strategies. • The global context of copper as a critical mineral for electrification and the energy transition supports a strong economic case for the Project; production aligns with federal and provincial Critical Minerals strategies.	• Develop and implement Reclamation and Closure Plans that align with agreed-upon returning land use objectives and support sustainable post-closure outcomes. • Collaborate with First Nations and local communities to identify skills, training, and workforce development needs, supporting long-term employment capacity and economic participation. • Implement employment and workforce development strategies that increase opportunities for local and Indigenous hiring, training, retention, and career advancement. • Support local and Indigenous procurement by prioritizing opportunities for community businesses to provide goods, services, and contracting support throughout the Project life cycle. • Develop and implement workforce transition plans to support employees at the end of mine life through retraining, career development, employment placement, and other transition assistance programs. • Partner with First Nations to deliver skills inventory, training, apprenticeship, and capacity-building programs that support participation in Project-related and future economic opportunities.
Land Use	• Direct land use changes resulting from Project infrastructure (open pit, TWMF, process plant, roads, transmission line, camp) will affect Crown land within the Morice LRMP area, displacing or restricting other uses including forestry, trapping, recreation, and First Nations traditional activities. • Changes to access along the Morice FSR corridor—including increased industrial traffic, potential access controls, road damage, and dust—may affect the ability of First Nations, trappers, recreational users, and forestry operators to access and use lands traditionally or commercially. • Provincially registered traplines TR 726 T005 and TR 726 T006 overlap with the Project Area; trappers may experience habitat loss, direct disturbance, or loss of access to productive trapping areas, affecting livelihoods and cultural practices. • Increased access from road improvements may allow previously inaccessible areas to be used for hunting and recreation, potentially creating competition for traditional harvesting areas and increasing pressure on wildlife populations. • The Project footprint overlaps with First Nations keyohs (family territories) systems of the Dakelh people, including houses of the Wet'suwet'en Thin House (Gilseyhyu Clan); impacts on the safe and productive use of traditional lands, and on family stewardship rights and responsibilities, must be assessed. • Water use (freshwater licence for Nanika Lake; pit dewatering) may affect downstream water availability for existing water users, including potential effects on future First Nations water rights and water-dependent traditional activities. • The Burns Lake Snowmobile Club cabin (located near the base of the current Berg access road) and a known canoe route ending at Kidprice Lake represent specific non-traditional recreational land uses that may be affected by Project development.	• Engage with First Nations, tenure holders, recreational users, and the public to identify concerns and inform mitigation measures that support continued access to lands and resources, maintenance of commercial tenures, and achievement of returning land use objectives. • Develop and implement Reclamation and Closure Plans that are consistent with agreed-upon returning land use objectives and support long-term ecological, cultural, recreational, and economic values. • Work collaboratively with First Nations to identify potential effects on the use of lands, waters, and resources and develop culturally appropriate mitigation measures that facilitate ongoing access and traditional land use activities. • Incorporate Traditional Knowledge and traditional land use information into Project planning, mitigation design, monitoring, reclamation, and closure activities, were shared by Indigenous communities. • Maintain ongoing, meaningful engagement with First Nations to ensure their interests, concerns, and priorities are understood and considered throughout Project planning, construction, operations, closure, and post-closure. • Implement culturally appropriate mitigation measures, including those related to noise, dust, water quality, traffic, and access management, to reduce potential effects on Indigenous land and resource use. • Establish participation and benefit agreements with First Nations, where appropriate, to support Indigenous involvement in Project planning, environmental stewardship, monitoring, employment, training, and economic development opportunities. • Support Indigenous-led monitoring, stewardship, and land use initiatives to strengthen long-term protection and management of cultural, environmental, and community values.

Component	Potential Effects	Example Management Approach
Social, Health, and Economic Environment *(cont'd)*		
Visual Resources	• The open pit, waste rock dumps, TWMF embankments, process plant, and associated infrastructure will create a large-scale, permanent visual change to the alpine and sub-alpine landscape of the Tahtsa Ranges, currently an undeveloped wilderness area. • Nighttime lighting from the mine site, camp, and roads will introduce artificial light into a currently dark-sky environment, affecting the quality of the visual and cultural landscape for First Nations, recreational users, and wildlife. • Visual changes to the landscape are of particular concern for First Nations whose cultural identity, spiritual practices, and sense of place are connected to the undisturbed condition of the Tahtsa Ranges and Morice watershed. • The transmission line will create linear visual disturbance visible from provincial parks (Morice Lake, Nenikëkh/ Nanika-Kidprice) and recreational use areas. • During closure and post-closure, the open pit void (likely to flood as a pit lake), revegetated TWMF, and residual engineered landforms will alter the long-term visual character of the landscape, with partial recovery of natural aesthetics over decades.	• Work with First Nations and communities to develop a Reclamation and Closure Plan that reflects future land-use goals. • Implement progressive reclamation throughout the Project life cycle to reduce the extent and duration of disturbance and support the timely recovery of ecosystem functions and land use values. • Use energy-efficient, wildlife-friendly lighting systems, including LED fixtures and full cut-off designs, to reduce energy consumption, light pollution, and effects on wildlife and nearby communities.
Physical and Cultural Heritage	• Ground disturbance across the approximately 34,798 ha mineral claim area—and particularly along road corridors, stream crossings, and infrastructure footprints—may affect archaeological sites, culturally modified trees, and traditional cultural landscapes not yet documented. • The obsidian arrowhead discovered in 2016 at approximately 1,800 m elevation indicates Indigenous occupation and movement in the high-elevation Project Area; potential loss, damage, or altered access to archaeological sites or areas of spiritual importance for First Nations; an AOA and Heritage Impact Assessment will be required as part of the EAC Application. • First Nations cultural landscapes—including named places, travel routes, ceremonial sites, and areas of spiritual significance to the Wet'suwet'en, Witset, WFN, STFN, NTB and CCN—may be affected by the physical and perceptual transformation of the Project Area. • Changes in accessibility to preferred traditional locations (due to road access controls, industrial traffic, or habitat degradation) may restrict the ability of First Nations to carry out cultural practices, ceremonies, and knowledge transmission activities tied to specific places. • The ability to transfer and practice Traditional Knowledge and cultural protocols in a landscape that is being industrialized—including the teaching of place names, traditional ecological knowledge, and harvesting skills to younger generations—may be meaningfully diminished.	• Conduct an Archaeological Impact Assessment (AIA) to identify, evaluate, and inform the management of archaeological and cultural heritage resources that may be affected by the Project. • Develop and implement a Chance Find Procedure to ensure the appropriate identification, protection, reporting, and management of previously unidentified archaeological or heritage resources encountered during Project activities. • Develop and implement a Heritage Resources Management Plan that identifies sensitive heritage and archaeological areas, establishes avoidance and protection measures where feasible, and outlines mitigation requirements for unavoidable disturbances. • Obtain applicable permits and approvals and implement appropriate mitigation measures where impacts to archaeological sites cannot be avoided, including site alteration permitting, monitoring, documentation, recovery, or other measures as required by regulators and Indigenous communities. • Engage with First Nations to incorporate Traditional Knowledge, cultural values, and heritage priorities into heritage resource management, mitigation, and monitoring programs.

Component	Potential Effects	Example Management Approach
Components of the Environment Within the Legislative Authority of the Federal Government		
Fish and Fish Habitat (*Fisheries Act*)	• Direct loss or alteration of fish habitat (stream crossings, riparian clearing, water diversions) triggering Section 35 authorization requirements under the *Fisheries Act*. • Changes in the quantity and quality of aquatic habitat resulting from alteration of stream flows in Berg Creek, Bergeland Creek, and tributaries of the Morice River. • Changes to water quality (elevated metals including copper, molybdenum, selenium; increased TSS; altered pH and temperature) that may result in the death of fish or harmful alteration, disruption or destruction (HADD) of fish habitat. • Changes in the amount, suitability, migration, and distribution of habitat for fish including Pacific salmon, steelhead, bull trout, and associated species downstream of the Project in the Morice-Skeena system. • Metal and Diamond Mining Effluent Regulations (MDMER) Schedule 2 amendment may be required if waterbody supporting fish habitat must be used as a tailings impoundment; effluent monitoring and reporting obligations under MDMER will apply to the TWMF and treatment pond discharges.	• Avoid and reduce direct loss of aquatic habitat through Project siting and design, including locating mine pits, waste rock storage facilities, and associated infrastructure away from fish-bearing waterbodies and sensitive aquatic habitats wherever feasible. • Incorporate mitigation-by-design measures to reduce both direct and indirect effects on aquatic ecosystems, including minimizing the mine footprint, maintaining aquatic connectivity, and limiting changes to instream flows and watershed processes. • Implement best management practices and environmental protection plans, including adherence to instream work standards, use of fish-friendly stream crossings and water intake structures, appropriately designed watercourse crossings, and effective erosion and sediment control measures. • Collaborate with First Nations on aquatic stewardship initiatives and develop habitat restoration, enhancement, offsetting, and fish relocation measures, where required, to address unavoidable harmful alteration, disruption, or destruction of fish habitat. • Implement surface water quality management measures to protect aquatic ecosystems and maintain water quality throughout construction, operations, closure, and post-closure. • Develop and implement Aquatic Effects Monitoring Programs to evaluate the effectiveness of mitigation measures, verify environmental predictions, and support adaptive management. • Apply an adaptive management framework to refine mitigation, monitoring, and habitat protection measures based on monitoring results, Traditional Knowledge, scientific information, and regulatory requirements.
Aquatic Species at Risk (SARA)	• The Morice River watershed is within the range of White Sturgeon (*Acipenser transmontanus*, Nechako River / Skeena populations) — listed as Endangered under SARA; change to water quality or flow in connected watercourses constitutes a potential SARA trigger. • Bull trout (*Salvelinus confluentus*) are SARA-listed as Special Concern; their presence in cold, clean headwater streams in the Project Area makes them a key receptor for assessing water quality and hydrological effects. • Sockeye salmon (Oncorhynchus nerka) populations using the Morice-Skeena system may overlap with SARA-assessed Designatable Units; their status and use of Project-adjacent habitats will need to be assessed. • Changes in water quality, quantity, and aquatic habitat resulting from alteration of stream flows, discharge of contact water, or seepage may affect listed aquatic species and designated critical habitat in receiving waters downstream of the Project. • SARA Section 73 authorization (Competent Minister) may be required if Project activities are likely to affect a listed wildlife species, part of its critical habitat, or the residences of its individuals.	• Avoid and reduce direct loss of aquatic habitat through Project siting and design, including locating mine pits, waste rock storage facilities, and associated infrastructure away from fish-bearing waterbodies wherever feasible. • Implement best management practices and environmental protection plans, including adherence to Standards and Practices for Instream Works, fish-friendly watercourse crossings and water intake structures, and erosion and sediment control measures to protect fish and fish habitat. • Develop and implement a Fish Habitat Stewardship Plan that considers potential effects on Sockeye Salmon Designated Units 20 and 21 and includes measures to avoid, reduce, offset, or compensate for unavoidable harmful alteration, disruption, or destruction of fish habitat. • Implement surface water quality management measures to maintain water quality and protect aquatic ecosystems throughout all phases of the Project. • Establish aquatic monitoring programs to assess the effectiveness of mitigation measures, verify environmental predictions, and support adaptive management where required. • Collaborate with First Nations and regulatory agencies in the development and implementation of fish habitat protection, stewardship, restoration, and monitoring initiatives.
Migratory Birds (*Migratory Birds Convention Act*)	• Clearing of vegetation and habitat during construction, particularly if undertaken during the migratory bird nesting season (approximately April 1–August 31), may result in destruction of active nests, eggs, or young, or deposit of harmful substances, contrary to the *Migratory Birds Convention Act*. • Loss or alteration of migratory bird habitat from land clearing, fragmentation, and changes to vegetation structure across the mine site and linear infrastructure corridors. • Open water features onsite (TWMF, contact water ponds, freshwater ponds) may attract migratory waterfowl; if these waterbodies contain concentrations of deleterious substances harmful to migratory birds, a deposit authorization under the *Migratory Birds Convention Act* may be required. • A list of migratory bird species potentially present in the Project Area is provided in Appendix B; nesting surveys will be conducted to inform construction scheduling and required mitigation measures.	• Reduce habitat loss and fragmentation for migratory birds by utilizing existing disturbed areas and infrastructure corridors where feasible and undertaking progressive reclamation to reduce the extent and duration of habitat disturbance. • Schedule vegetation clearing and habitat alteration activities outside the migratory bird nesting period wherever practicable to avoid effects on nesting birds and comply with the *Migratory Birds Convention Act, 1994* and applicable Environment and Climate Change Canada (ECCC) avoidance guidelines. • Conduct pre-construction nesting bird surveys were clearing during the breeding season cannot be avoided, and implement appropriate buffers, timing restrictions, or other mitigation measures around active nests. • Implement progressive reclamation and habitat restoration measures to support the re-establishment of native vegetation communities and migratory bird habitat following disturbance. • Monitor mitigation effectiveness and apply adaptive management to address unanticipated effects on migratory birds and their habitat.

Component	Potential Effects	Example Management Approach
Components of the Environment Within the Legislative Authority of the Federal Government *(cont'd)*		
Aeronautical and Marine Navigation	• Potential impact on aeronautical navigation from communication towers, lighting structures, or utility poles and wires associated with the transmission line and mine site infrastructure. • Proposed stream crossings (bridges or culverts) on the Morice FSR and within the mine access road may affect navigable waters under the *Canadian Navigable Waters Act*; approval from Transport Canada may be required for works in, on, over, under, through, or across navigable waters.	• Install and maintain aviation and navigation safety measures, including appropriate markings, signage, and lighting, in accordance with applicable regulatory requirements and safety standards. • Incorporate aviation and marine considerations into Project planning and design, including construction and operational activities, waterbody crossings, and instream works, to reduce potential disruptions and safety risks to aircraft and vessel traffic. • Coordinate with relevant regulatory authorities and users to ensure Project activities are conducted safely and in compliance with applicable aviation and navigation requirements. • Obtain and comply with applicable permits, approvals, and Minor Works Orders, and implement associated mitigation measures and conditions where required. • Develop traffic, marine, and aviation management procedures, as necessary, to communicate hazards, manage access, and maintain safe operations throughout Project construction and operation.
Potential Changes Outside of BC and Canada		
Potential Changes Outside BC Within Canada	• No material adverse effects are anticipated in other Canadian provinces or territories. Copper and molybdenum concentrates will be transported by truck and potentially by rail to port facilities, but the effects of this transport are anticipated to be within BC. • GHG emissions from Project operations contribute to national GHG inventories; the Project's estimated carbon intensity of approximately 1.27 tCO_2e per tonne of Copper Equivalent places it in the lowest global 10th percentile for open pit copper operations, supporting Canada's climate commitments.	• N/A
Potential Changes on Federal Lands	• No federal lands are anticipated to be directly affected by the Project footprint. Effects on fish and fish habitat downstream of the Project in federally managed waterways (*Fisheries Act* jurisdiction) are addressed under the federal components section above.	• N/A
Potential Changes Outside Canada	• No potential effects are anticipated outside Canada. Export of copper and molybdenum concentrates to overseas smelters will occur, but effects associated with further processing outside Canada are outside the scope of the Canadian EA process. • The Morice-Skeena salmon system supports Pacific Salmon Treaty obligations with the United States; material changes to salmon population health in the Skeena system attributable to the Project would have transboundary implications and will be considered in the cumulative effects assessment.	• N/A

10.1 Effects of the Environment on the Project

The natural environment may also affect the Project. The EAC Application will assess the potential for natural hazards and climate-related changes to affect the safety, function, and long-term integrity of Project infrastructure. Key considerations include:

- **Seismic hazard:** The Project is in a region with moderate seismic activity; all major structures (open pit slopes, TWMF embankments, water management infrastructure) will be designed to a minimum seismic design standard consistent with dam classification and facility risk levels.
- **Snow and ice loading:** The high-elevation location of the Project (ore body centred at ~1,800 masl) exposes infrastructure to significant snow loads, avalanche hazard, and freeze-thaw cycles; these must be accounted for in design of open-air structures, roads, and slopes.
- **Flooding and extreme precipitation:** Extreme rainfall and snowmelt events in the coastal-influenced Tahtsa Ranges can generate high-intensity flood flows; water management infrastructure is designed to the 1:100-year flood standard, and the TWMF spillway will be designed for the Probable Maximum Flood.
- **Climate change:** Projected changes to temperature, precipitation, snowpack, and glacial melt in the Tahtsa Ranges under climate change scenarios will be incorporated into long-term water balance modelling, infrastructure design standards, and closure planning, consistent with provincial guidance for climate-resilient mine design.
- **Permafrost:** At the highest elevations of the Project Area, localized permafrost or frost-susceptible soils may be present; geotechnical investigation will confirm the extent and implications for infrastructure foundations.

Additional potential effects of the environment on the Project may be identified during engagement.

10.2 Potential Changes to the Environment Outside of British Columbia and Canada

The Project is not anticipated to cause adverse environmental effects outside of BC or Canada. Copper and molybdenum concentrates produced by the Project will be transported from the mine site by a third-party to a rail load-out facility and/or port facility, likely for export and further processing outside Canada.

The Morice-Skeena salmon system is subject to the Pacific Salmon Treaty between Canada and the United States. Material adverse effects on salmon populations in the Skeena watershed attributable to the Project would have implications for Canada's Treaty obligations and will be assessed within the cumulative effects framework. No adverse transboundary effects on salmon populations are anticipated, as mitigation measures will be implemented effectively.

GHG emissions from the Project contribute to Canada's national GHG inventory but are not anticipated to create localized transboundary air quality effects.

10.3 Potential Cumulative Effects

The EAC Application will include a cumulative effects assessment to evaluate the Project's potential cumulative effects on environmental, social, economic, cultural, and health values. The assessment will consider the combined influence of past, present, and reasonably foreseeable future projects and activities, and will evaluate whether the Project may contribute to cumulative changes within the regional environment and communities. The assessment will identify mitigation and management measures, where appropriate, to avoid, reduce, or manage potential cumulative effects.

Projects and activities currently anticipated to be considered in the cumulative effects assessment include:

- **Coastal GasLink Pipeline:** constructed through the Wet'suwet'en and Morice watershed region; residual effects on land, water, and wildlife habitats form a baseline condition for cumulative assessment;
- **BC Hydro North Coast Transmission Line:** Potential future linear infrastructure that could affect the same wildlife corridors and First Nations territories;
- **Huckleberry Mine (care and maintenance) and associated Morice FSR industrial use history:** Legacy effects on road condition, fish habitat, water quality, and wildlife access in the same corridor;
- **Blackwater Gold Mine (Artemis Gold, operational ~2024, ~180 km SE):** Contributes to the regional economic and social context, and to cumulative regional employment and community service demand;
- **Active forestry tenures in the Morice LRMP area:** Historic and ongoing timber harvesting have altered wildlife habitat, drainage patterns, and the condition of the Morice watershed; forest harvesting activity forms a key component of the regional baseline;
- **Junior exploration projects on the Morice FSR corridor (Equity Metals Silver Queen, Visla Copper Poplar, Sun Summit Metals Buck):** Potential future development projects sharing the same access corridor and regional environment;
- **Caribou recovery planning and management actions:** The Tweedsmuir-Entiako herd occupying the Project Area is subject to provincial and federal recovery planning; cumulative disturbance from the Project must be assessed against recovery goals; and
- **Climate change effects on the Tahtsa Ranges and Morice watershed:** Changing snowpack, temperature, and precipitation patterns will interact with Project effects on water quantity and quality over the mine life.

11. Closing

This IPD provides an early overview of the Project, including its purpose, proposed components, anticipated activities, existing environmental and social setting, engagement completed to date, and preliminary understanding of potential Project effects. It is intended to support meaningful Early Engagement with First Nations, government agencies, stakeholders, and the public, and to facilitate early identification of interests, issues, opportunities, and information requirements that will inform the EA process.

Following acceptance of the IPD by the BC EAO, the Project will enter the Early Engagement phase of the EA process. During this phase, First Nations, government agencies, stakeholders, and the public will have opportunities to review the Project and provide input on the proposed Project, engagement approach, and the scope of information required to support the assessment. The EAO will consider this feedback in preparing the Joint Summary of Issues and Engagement, which will identify key issues, engagement outcomes, and information requirements to guide the next phase of the assessment.

The information gathered through Early Engagement, together with ongoing technical studies, engineering refinement, and continued collaboration with First Nations and other participants, will inform preparation of the DPD. The DPD will present a more refined Project design, summarize how key issues identified during Early Engagement have been considered, and provide the foundation for the subsequent planning phase of the EA.

12. References

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Heritage Conservation Act, RSBC 1996, C 187.

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Indian Act, RSC 1985, C I-5.

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Land Act, RSBC 1996, C 245.

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Physical Activities Regulations, SOR/2019-285.

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Appendix A Berg Copper Project Engagement Plan Concordance

The EAO's Early Engagement Guide (EAO 2025), Appendix 2, stipulates the requirements that must be contained in the Engagement Plan that is required under Section 13(1)b of the *Environmental Assessment Act*. Surge has integrated this content into the IPD above. This integrated approach was identified as providing greater clarity for readers and reduces repetitive content. Table A-1 below provides a concordance of where the EAO's Engagement Plan requirements are addressed in the IPD.

TABLE A-1 TABLE OF CONCORDANCE FOR ENGAGEMENT PLAN REQUIREMENTS

Requirement	Location in IPD
General Information and Contacts	
Project name	Section 1 Introduction
Project location within the province	Section 3.2 Project Location
Project industrial sector and type (e.g., open pit metal mine)	Section 1 Introduction
Proponent name, mailing address, phone numbers, email address and website URL. Include the name and contact information of the primary representative for the EA	Section 2 Proponent Information
Project Overview	
A brief description of the proposed project	Section 4 Project Description
The proximity of the proposed project to local communities, neighbourhoods and/or areas used by or of value to First Nations and the public	Section 3.2 Project Location
An outline of engagement that occurred in the development of the Engagement Plan and how any feedback received was considered and addressed	Section 6 First Nations and Section 7 Local Governments, Government Agencies, Stakeholders, and the Public
Engagement Methods	
A list of who the proponent proposes to engage with during Early Engagement, including key contact names for appropriate First Nations, members of the public, local governments, provincial and federal government agencies, and stakeholders, and a rationale for those selected	Section 6.5 to 6.11 First Nations Engagement Section 7.1.1 Local Government Engagement Section 7.2.1 Provincial and Federal Government Agencies Engagement Section 7.3.1 Stakeholder and Public Engagement
An outline of when and how each party will be engaged during Early Engagement, including but not limited to, the type and frequency of engagement and any constraints to the engagement	Section 6.13, Planned First Nation Engagement Section 7.1.4 Planned Engagement Local Government Section 7.2.3 Planned Engagement Provincial and Federal Government Agencies Section 7.3.3 Planned Engagement Stakeholder and Public
An identification of any potentially impacted populations that may be underrepresented by the proposed engagement methods and how this will be mitigated or otherwise addressed	Section 7.3.3 Planned Engagement

Requirement	Location in IPD
Engagement Methods *(cont'd)*	
A description of different types of engagement tailored to the project and the area to ensure opportunities for all potentially impacted people	Section 7.3.3 Planned Engagement Section 6.13 Planned First Nation Engagement
An outline of how information will be communicated in a timely and consistent manner	Section 6.13, Planned First Nation Engagement Section 7.1.4 Planned Engagement Local Government Section 7.2.3 Planned Engagement Provincial and Federal Government Agencies Section 7.3.3 Planned Engagement Stakeholder and Public
A description of how input and feedback will be gathered and how it will be considered, including how it will be used in project design and what deliverables will be produced to respond to the feedback received	Section 6.3 First Nation Engagement Section 10 Local Governments, Government Agencies, Stakeholders and the Public
An outline of the process for periodic updating of the Engagement Plan, including when and how the document may be updated and the process for communicating any updates made	Section 7.3.3 Planned Engagement Section 6.13 Planned First Nation Engagement
First Nation Engagement	
A list of all First Nations whose Consultation Area overlaps with the project components as well as area of potential direct or indirect effects of the project	Section 1 – Initial list of all First Nations Descriptions for each First Nation in Sections 6.3, 6.5.1, 6.6.1, 6.7.1, 6.8.1, 6.9.1, and 6.10.1.
For each First Nation identified, an overview of engagement activities that have been carried out, a description or tracking table of issues that have been raised with respect to the proposed project, and an explanation of how those issues have been or will be addressed by the proponent, providing a clear rationale for not addressing any issues raised	Engagement summaries provided for each First Nation in Sections 6.6.2, 6.7.2, 6.8.2, 6.9.2, 6.10.2 and 6.11.2. Summary of issue provided for each First Nation in Sections 6.6.3, 6.7.3, 6.8.3, 6.9.3, 6.10.3 and 6.11.3.
A description of how First Nations were engaged in the development of the IPD and Engagement Plan, including: Opportunities provided to adequately review and gain an understanding of information in the draft IPD and Engagement Plan	Section 6.12 Summary of First Nation Engagement
A list of any relevant agreements (including agreements between First Nations), memorandums of understanding, assessment protocols, treaties or other publicly available information of potentially affected First Nations and how the agreements informed the Engagement Plan	Section 6.4 First Nation Agreements
A description of how Traditional Knowledge holders will be engaged to ensure Traditional Knowledge is applied appropriately and in alignment with the laws and customs of the First Nations. Refer to the Traditional Knowledge Guide for more information	Section 6.3.2 Traditional Knowledge
An outline of how participating Indigenous nations will be engaged during the development of the DPD	Section 6.13, Planned First Nation Engagement

Requirement	Location in IPD
Public and Stakeholder Engagement	
A list of the groups, populations, or individuals that the proponent will engage with as part of public engagement	Section 7.3 Overview of Stakeholder and Public Engagement
A list of the public's interests in the proposed project, such as concerns, potential benefits, project design improvements, and how the public wish to be engaged in Early Engagement and the EA	Section 7.3.3 Planned Engagement Section 7.1.4 Planned Engagement
A description of any engagement already completed with landowners, land rights holders, other commercial, industrial, agricultural, and recreational land users, as well as the public, including key interests or issues identified and how these interests/issues were considered in project design	Section 7.3 Summary of Stakeholder and Public Engagement
A table identifying the issues that have been raised by those parties with respect to the proposed project, and an explanation of how those issues have been or will be addressed by the proponent; and	Section 7.3 Summary of Stakeholder and Public Engagement
A description of how local information and knowledge will be collected and considered in project planning and in the preparation of the DPD	Section 7.3.3 Planned Engagement for Stakeholders and Public
Engagement with Local Governments and Government Agencies	
A list of all appropriate local governments, and provincial and federal government agencies to be engaged with and relevant representatives from each agency	Section 7.1.1 Overview of Local Government Engagement Section 10.2.1 Overview of Provincial and Federal Government Agencies Engagement
A description of any previous engagement with local governments, and provincial and federal government agencies prior to submission of the Engagement Plan, including how the Engagement Plan reflects these engagement discussions	Section 10.1.2 Summary of Engagement Activities with Local Governments Section 10.2.2 Summary of Engagement Activities with Provincial and Federal Government Agencies
A list of any municipal plans relevant to the EA	Table 7.1-2 Municipal and Regional Plans

Appendix B Migratory Birds Potentially in the Project Area

TABLE B-1 POTENTIAL MIGRATORY BIRDS IN THE PROJECT AREA

Common Name	Scientific Name	Provincial	BC List	Global	COSEWIC	SARA Status	*Migratory Birds Convention Act*	Likelihood of Presence
Alder Flycatcher	*Empidonax alnorum*	S5B (2022)	Yellow	G5 (2016)			Y	Confirmed
American Bittern	*Botaurus lentiginosus*	S3B,SNRN (2015)	Blue	G5 (2016)			Y	Possible
American Coot	*Fulica americana*	S4S5B (2015)	Yellow	G5 (2016)	NAR		Y	Possible
American Crow	*Corvus brachyrhynchos*	S5 (2015)	Yellow	G5 (2016)			N	Confirmed
American Dipper	*Cinclus mexicanus*	S4 (2015)	Yellow	G5 (2024)			Y	Probable
American Goshawk (ssp. atricapillus)	*Accipiter atricapillus atricapillus*	S3S4 (2017)	Blue	G5T5 (2023)	NAR		N	Confirmed, subspecies unknown
American Goshawk (ssp. laingi)	*Accipiter atricapillus laingi*	S2 (2010)	Red	G5T2 (2016)	T	1-T (2003)	N	Confirmed, subspecies unknown
American Kestrel	*Falco sparverius*	S4S5B (2015)	Yellow	G5 (2016)			N	Probable
American Pipit	*Anthus rubescens*	S5B,SNRN (2015)	Yellow	G5 (2016)			Y	Confirmed
American Redstart	*Setophaga ruticilla*	S5B (2015)	Yellow	G5 (2016)			Y	Confirmed
American Robin	*Turdus migratorius*	S5 (2015)	Yellow	G5 (2016)			Y	Confirmed
American Three-toed Woodpecker	*Picoides dorsalis*	S5 (2015)	Yellow	G5 (2016)			Y	Confirmed
American Tree Sparrow	*Spizelloides arborea*	S4B (2015)	Yellow	G5 (2016)			Y	Possible
American Wigeon	*Mareca americana*	S5B,S5N (2015)	Yellow	G5 (2016)			Y	Possible
Arctic Tern	*Sterna paradisaea*	S4B (2023)	Yellow	G5 (2016)			Y	Possible
Bald Eagle	*Haliaeetus leucocephalus*	S5B,S5N (2015)	Yellow	G5 (2016)	NAR		N	Confirmed
Bank Swallow	*Riparia riparia*	S4?B (2022)	Yellow	G5 (2016)	T	1-T (2017)	Y	Possible

Common Name	Scientific Name	Provincial	BC List	Global	COSEWIC	SARA Status	*Migratory Birds Convention Act*	Likelihood of Presence
Barn Swallow	*Hirundo rustica*	S4B (2022)	Yellow	G5 (2016)	SC	1-T (2017)	Y	Confirmed
Barred Owl	*Strix varia*	S5 (2015)	Yellow	G5 (2016)			N	Possible
Barrow's Goldeneye	*Bucephala islandica*	S4S5 (2015)	Yellow	G5 (2016)			Y	Confirmed
Belted Kingfisher	*Megaceryle alcyon*	S4S5 (2015)	Yellow	G5 (2016)			Y	Probable
Black Swift	*Cypseloides niger*	S2S4B (2022)	Blue	G4 (2016)	E	1-E (2019)	Y	Possible
Black Tern	*Chlidonias niger*	S2S4B (2023)	Blue	G4G5 (2016)	NAR		Y	Possible
Black-backed Woodpecker	*Picoides arcticus*	S4S5B (2015)	Yellow	G5 (2017)			Y	Confirmed
Black-billed Magpie	*Pica hudsonia*	S5 (2015)	Yellow	G5 (2016)			N	Possible
Black-capped Chickadee	*Poecile atricapillus*	S5 (2015)	Yellow	G5 (2016)			Y	Confirmed
Blackpoll Warbler	*Setophaga striata*	S5B (2015)	Yellow	G5 (2016)			Y	Confirmed
Blue-winged Teal	*Spatula discors*	S4S5B (2015)	Yellow	G5 (2016)			Y	Possible
Bohemian Waxwing	*Bombycilla garrulus*	S5 (2015)	Yellow	G5 (2016)			Y	Confirmed
Bonaparte's Gull	*Chroicocephalus philadelphia*	S5? (2023)	Yellow	G5 (2016)			Y	Possible
Boreal Chickadee	*Poecile hudsonicus*	S5 (2015)	Yellow	G5 (2016)			Y	Probable
Boreal Owl	*Aegolius funereus*	S4 (2015)	Yellow	G5 (2016)	NAR		N	Possible
Brewer's Blackbird	*Euphagus cyanocephalus*	S5 (2015)	Yellow	G5 (2016)			Y	Possible
Brown Creeper	*Certhia americana*	S5 (2015)	Yellow	G5 (2016)			Y	Confirmed
Brown-headed Cowbird	*Molothrus ater*	S5 (2015)	Yellow	G5 (2016)			Y	Possible
Bufflehead	*Bucephala albeola*	S5B,SNRN (2015)	Yellow	G5 (2016)			Y	Probable
Calliope Hummingbird	*Selasphorus calliope*	S5B (2022)	Yellow	G5 (2016)			Y	Possible

Common Name	Scientific Name	Provincial	BC List	Global	COSEWIC	SARA Status	*Migratory Birds Convention Act*	Likelihood of Presence
Canada Goose	*Branta canadensis*	S5 (2015)	Yellow	G5 (2016)			Y	Confirmed
Canvasback	*Aythya valisineria*	S4B,SNRN (2015)	Yellow	G5 (2016)			Y	Possible
Cassin's Vireo	*Vireo cassinii*	S5B (2015)	Yellow	G5 (2016)			Y	Possible
Cedar Waxwing	*Bombycilla cedrorum*	S5 (2015)	Yellow	G5 (2016)			Y	Confirmed
Chestnut-backed Chickadee	*Poecile rufescens*	S5 (2022)	Yellow	G5 (2016)			Y	Probable
Chipping Sparrow	*Spizella passerina*	S5B (2015)	Yellow	G5 (2016)			Y	Confirmed
Cinnamon Teal	*Spatula cyanoptera*	S4B (2015)	Yellow	G5 (2016)			Y	Possible
Clark's Nutcracker	*Nucifraga columbiana*	S5 (2015)	Yellow	G5 (2016)			N	Confirmed
Clay-colored Sparrow	*Spizella pallida*	S5B (2015)	Yellow	G5 (2016)			Y	Confirmed
Cliff Swallow	*Petrochelidon pyrrhonota*	S4S5B (2022)	Yellow	G5 (2016)			Y	Confirmed
Common Goldeneye	*Bucephala clangula*	S5 (2015)	Yellow	G5 (2016)			Y	Possible
Common Loon	*Gavia immer*	S5 (2015)	Yellow	G5 (2016)	NAR		Y	Confirmed
Common Merganser	*Mergus merganser*	S5 (2015)	Yellow	G5 (2016)			Y	Probable
Common Nighthawk	*Chordeiles minor*	S3S5B (2022)	Blue	G5 (2016)	SC	1-SC (2023)	Y	Possible
Common Raven	*Corvus corax*	S5 (2015)	Yellow	G5 (2016)			N	Confirmed
Common Redpoll	*Acanthis flammea*	S4 (2015)	Yellow	G5			Y	Possible
Common Yellowthroat	*Geothlypis trichas*	S5 (2015)	Yellow	G5 (2016)			Y	Confirmed
Cooper's Hawk	*Accipiter cooperii*	S5 (2015)	Yellow	G5 (2016)	NAR		N	Possible
Dark-eyed Junco	*Junco hyemalis*	S5 (2015)	Yellow	G5 (2016)			Y	Confirmed
Downy Woodpecker	*Dryobates pubescens*	S5 (2015)	Yellow	G5 (2016)			Y	Probable
Dusky Flycatcher	*Empidonax oberholseri*	S5B (2022)	Yellow	G5 (2016)			Y	Confirmed

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Dusky Grouse	*Dendragapus obscurus*	S4 (2015)	Yellow	G5 (2016)			N	Possible
Eared Grebe	*Podiceps nigricollis*	S3B (2015)	Blue	G5 (2016)			Y	Possible
Eastern Kingbird	*Tyrannus tyrannus*	S4B (2022)	Yellow	G5 (2016)			Y	Possible
Eurasian Collared-Dove	*Streptopelia decaocto*	SNA (2009)	Exotic	G5 (2016)			N	Possible
European Starling	*Sturnus vulgaris*	SNA (2024)	Exotic	G5 (2016)			N	Possible
Evening Grosbeak	*Coccothraustes vespertinus*	S5 (2022)	Yellow	G5 (2016)	SC	1-SC (2019)	Y	Possible
Fox Sparrow	*Passerella iliaca*	S5 (2015)	Yellow	G5 (2016)			Y	Confirmed
Gadwall	*Mareca strepera*	S5 (2015)	Yellow	G5 (2016)			Y	Possible
Golden Eagle	*Aquila chrysaetos*	S4S5 (2015)	Yellow	G5 (2016)	NAR		N	Possible
Golden-crowned Kinglet	*Regulus satrapa*	S5 (2015)	Yellow	G5 (2016)			Y	Confirmed
Golden-crowned Sparrow	*Zonotrichia atricapilla*	S5?B (2015)	Yellow	G5 (2016)			Y	Confirmed
Gray Catbird	*Dumetella carolinensis*	S5B (2015)	Yellow	G5 (2016)			Y	Possible
Canada Jay	*Perisoreus canadensis*	S5 (2015)	Yellow	G5 (2016)			Y	Confirmed
Gray-cheeked Thrush	*Catharus minimus*	S4S5B (2015)	Yellow	G5 (2016)			Y	Possible
Gray-crowned Rosy-Finch	*Leucosticte tephrocotis*	S5?B (2015)	Yellow	G5 (2016)			Y	Possible
Great Gray Owl	*Strix nebulosa*	S4 (2015)	Yellow	G5 (2016)	NAR		N	Possible
Great Horned Owl	*Bubo virginianus*	S5 (2015)	Yellow	G5 (2016)			N	Possible
Greater Scaup	*Aythya marila*	S4N (2015)	Yellow	G5 (2016)			Y	Possible
Greater Yellowlegs	*Tringa melanoleuca*	S4 (2025)	Yellow	G5 (2016)			Y	Confirmed
Green-winged Teal	*Anas crecca*	S5B,S5N (2015)	Yellow	G5 (2016)			Y	Probable

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Hairy Woodpecker	*Dryobates villosus*	S5 (2015)	Yellow	G5 (2016)			Y	Probable
Hammond's Flycatcher	*Empidonax hammondii*	S5B (2022)	Yellow	G5 (2016)			Y	Confirmed
Harlequin Duck	*Histrionicus histrionicus*	S4B,S3N (2015)	Yellow	G4 (2016)			Y	Possible
Hermit Thrush	*Catharus guttatus*	S5B (2015)	Yellow	G5 (2016)			Y	Confirmed
Herring Gull	*Larus argentatus*	S5?B (2015)	Yellow	G5			Y	Possible
Hooded Merganser	*Lophodytes cucullatus*	S5 (2015)	Yellow	G5 (2016)			Y	Possible
Horned Grebe	*Podiceps auritus*	S4B,SNRN (2015)	Yellow	G5 (2016)	SC	1-SC	Y	Possible
Horned Lark	*Eremophila alpestris*	S3S5 (2022)	Blue	G5 (2016)			Y	Possible
House Sparrow	*Passer domesticus*	SNA (2024)	Exotic	G5 (2016)			N	Possible
Killdeer	*Charadrius vociferus*	S3S5B (2022)	Blue	G5 (2025)			Y	Confirmed
Lazuli Bunting	*Passerina amoena*	S5B (2015)	Yellow	G5 (2016)			Y	Unlikely
Least Flycatcher	*Empidonax minimus*	S5B (2022)	Yellow	G5 (2016)			Y	Probable
Least Sandpiper	*Calidris minutilla*	S4B,S5M (2025)	Yellow	G5 (2016)			Y	Possible
Lesser Scaup	*Aythya affinis*	S5B,S5N (2015)	Yellow	G5 (2016)			Y	Confirmed
Lesser Yellowlegs	*Tringa flavipes*	S3S4B (2022)	Blue	G5 (2016)	T		Y	Probable
Lincoln's Sparrow	*Melospiza lincolnii*	S5B,SNRN (2015)	Yellow	G5 (2016)			Y	Confirmed
Long-eared Owl	*Asio otus*	S4 (2015)	Yellow	G5 (2016)			N	Possible
MacGillivray's Warbler	*Geothlypis tolmiei*	S5B (2015)	Yellow	G5 (2016)			Y	Confirmed
Magnolia Warbler	*Setophaga magnolia*	S5B (2015)	Yellow	G5 (2016)			Y	Possible

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Mallard	*Anas platyrhynchos*	S5B,S5N (2015)	Yellow	G5 (2016)			Y	Confirmed
Merlin	*Falco columbarius*	S5 (2015)	Yellow	G5 (2016)	NAR		N	Probable
Short-billed Gull	*Larus brachyrhynchus*	S4B (2015)	Yellow	G5 (2016)			Y	Confirmed
Mountain Bluebird	*Sialia currucoides*	S4S5B (2015)	Yellow	G5 (2016)			Y	Confirmed
Mountain Chickadee	*Poecile gambeli*	S5 (2015)	Yellow	G5 (2016)			Y	Confirmed
Northern Flicker	*Colaptes auratus*	S5 (2015)	Yellow	G5 (2016)			Y	Confirmed
Northern Harrier	*Circus hudsonius*	S4B (2015)	Yellow	G5 (2017)	NAR		N	Possible
Northern Hawk Owl	*Surnia ulula*	S4S5 (2015)	Yellow	G5 (2016)	NAR		N	Possible
Northern Pintail	*Anas acuta*	S4B,S5N (2015)	Yellow	G5 (2016)			Y	Possible
Northern Pygmy-Owl	*Glaucidium gnoma*	S4B (2015)	Yellow	G4G5 (2016)			N	Possible
Northern Rough-winged Swallow	*Stelgidopteryx serripennis*	S4S5B (2022)	Yellow	G5 (2016)			Y	Probable
Northern Saw-whet Owl	*Aegolius acadicus*	S5B,S5N (2009)	Yellow	G5 (2016)			N	Possible
Northern Shoveler	*Spatula clypeata*	S5B,S5N (2015)	Yellow	G5 (2016)			Y	Possible
Northern Shrike	*Lanius borealis*	S4B,S4N (2015)	Yellow	G5 (2016)			N	Possible
Northern Waterthrush	*Parkesia noveboracensis*	S5B (2015)	Yellow	G5 (2016)			Y	Confirmed
Olive-sided Flycatcher	*Contopus cooperi*	S4B (2022)	Yellow	G4 (2024)	SC	1-SC (2023)	Y	Confirmed
Orange-crowned Warbler	*Leiothlypis celata*	S5B (2015)	Yellow	G5 (2016)			Y	Confirmed
Osprey	*Pandion haliaetus*	S5B (2015)	Yellow	G5 (2016)			N	Confirmed
Pacific Wren	*Troglodytes pacificus*	S5 (2015)	Yellow	G5 (2016)			Y	Confirmed

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Peregrine Falcon	*Falco peregrinus*	S3 (2015)	No Status	G4 (2016)			N	Possible
Pileated Woodpecker	*Dryocopus pileatus*	S5 (2015)	Yellow	G5 (2016)			Y	Probable
Pine Grosbeak	*Pinicola enucleator*	S5 (2015)	Yellow	G5 (2016)			Y	Confirmed
Pine Siskin	*Spinus pinus*	S5B (2015)	Yellow	G5 (2016)			Y	Confirmed
Purple Finch	*Haemorhous purpureus*	S5B (2015)	Yellow	G5 (2016)			Y	Confirmed
Red Crossbill	*Loxia curvirostra*	S5 (2015)	Yellow	G5 (2016)			Y	Probable
Red-breasted Nuthatch	*Sitta canadensis*	S5 (2015)	Yellow	G5 (2016)			Y	Confirmed
Red-breasted Sapsucker	*Sphyrapicus ruber*	S5B (2015)	Yellow	G5 (2016)			Y	Probable
Red-eyed Vireo	*Vireo olivaceus*	S5B (2015)	Yellow	G5 (2016)			Y	Possible
Red-necked Grebe	*Podiceps grisegena*	S5?B (2015)	Yellow	G5 (2016)	NAR		Y	Possible
Red-necked Phalarope	*Phalaropus lobatus*	S3B,SNRM (2023)	Blue	G4G5 (2016)	SC	1-SC (2019)	Y	Unlikely
Red-tailed Hawk	*Buteo jamaicensis*	S5 (2015)	Yellow	G5 (2016)	NAR		N	Confirmed
Red-throated Loon	*Gavia stellata*	S4 (2015)	Yellow	G5 (2016)			Y	Possible
Red-winged Blackbird	*Agelaius phoeniceus*	S5B,S5N (2015)	Yellow	G5 (2025)			Y	Confirmed
Ring-billed Gull	*Larus delawarensis*	S4?B (2015)	Yellow	G5 (2016)			Y	Possible
Ring-necked Duck	*Aythya collaris*	S5B,S5N (2015)	Yellow	G5 (2016)			Y	Confirmed
Rock Ptarmigan	*Lagopus muta*	S4S5 (2015)	Yellow	G5 (2016)			N	Possible
Ruby-crowned Kinglet	*Corthylio calendula*	S5 (2015)	Yellow	G5 (2016)			Y	Confirmed
Ruffed Grouse	*Bonasa umbellus*	S5 (2015)	Yellow	G5 (2016)			N	Confirmed
Rufous Hummingbird	*Selasphorus rufus*	S4?B (2022)	Yellow	G4 (2020)			Y	Confirmed

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Rusty Blackbird	*Euphagus carolinus*	S3S4 (2025)	Blue	G4 (2016)	SC	1-SC (2009)	Y	Possible
Savannah Sparrow	*Passerculus sandwichensis*	S5B (2022)	Yellow	G5 (2016)			Y	Confirmed
Say's Phoebe	*Sayornis saya*	S4S5B (2022)	Yellow	G5 (2016)			Y	Possible
Semipalmated Plover	*Charadrius semipalmatus*	S4B (2025)	Yellow	G5 (2016)			Y	Possible
Sharp-shinned Hawk	*Accipiter striatus*	S5B,S5N (2015)	Yellow	G5 (2016)	NAR		N	Probable
Short-eared Owl	*Asio flammeus*	S3B,S1N (2022)	Blue	G5 (2025)	T	1-SC (2012)	N	Possible
Solitary Sandpiper	*Tringa solitaria*	S5B (2025)	Yellow	G5 (2016)			Y	Confirmed
Song Sparrow	*Melospiza melodia*	S5 (2015)	Yellow	G5 (2016)			Y	Confirmed
Sooty Grouse	*Dendragapus fuliginosus*	S4 (2015)	Yellow	G5 (2016)			Y	Possible
Sora	*Porzana carolina*	S5 (2015)	Yellow	G5 (2016)			Y	Possible
Spotted Sandpiper	*Actitis macularius*	S5B (2022)	Yellow	G5 (2016)			Y	Confirmed
Spruce Grouse	*Canachites canadensis*	S5 (2015)	Yellow	G5 (2016)			N	Confirmed
Steller's Jay	*Cyanocitta stelleri*	S5 (2015)	Yellow	G5 (2016)			N	Confirmed
Swainson's Hawk	*Buteo swainsoni*	S2B (2022)	Red	G5 (2016)			N	Confirmed
Swainson's Thrush	*Catharus ustulatus*	S5B (2015)	Yellow	G5 (2016)			Y	Confirmed
Tennessee Warbler	*Leiothlypis peregrina*	S5B (2015)	Yellow	G5 (2016)			Y	Possible
Townsend's Solitaire	*Myadestes townsendi*	S5B (2015)	Yellow	G5 (2016)			N	Probable
Townsend's Warbler	*Setophaga townsendi*	S5B (2015)	Yellow	G5 (2016)			Y	Confirmed
Tree Swallow	*Tachycineta bicolor*	S5B (2022)	Yellow	G5 (2016)			Y	Confirmed
Trumpeter Swan	*Cygnus buccinator*	S4B,S5N (2015)	Yellow	G4 (2016)	NAR		Y	Possible

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Varied Thrush	*Ixoreus naevius*	S5 (2015)	Yellow	G5 (2016)			Y	Confirmed
Vaux's Swift	*Chaetura vauxi*	S4S5B (2022)	Yellow	G5 (2016)			Y	Possible
Violet-green Swallow	*Tachycineta thalassina*	S5B (2022)	Yellow	G5 (2016)			Y	Possible
Warbling Vireo	*Vireo gilvus*	S5B (2015)	Yellow	G5			Y	Confirmed
Western Flycatcher	*Empidonax difficilis*	S5B (2022)	Yellow	G5 (2016)			Y	Probable
Western Tanager	*Piranga ludoviciana*	S5B (2015)	Yellow	G5 (2016)			Y	Confirmed
Western Wood-Pewee	*Contopus sordidulus*	S5?B (2022)	Yellow	G5 (2016)			Y	Probable
White-breasted Nuthatch	*Sitta carolinensis*	S5 (2015)	Yellow	G5 (2016)			Y	Unlikely
White-crowned Sparrow	*Zonotrichia leucophrys*	S5 (2011)	Yellow	G5 (2016)			Y	Confirmed
White-tailed Ptarmigan	*Lagopus leucura*	S5? (2015)	Yellow	G5 (2016)			N	Confirmed
White-throated Sparrow	*Zonotrichia albicollis*	S5 (2015)	Yellow	G5 (2016)			Y	Confirmed
White-winged Crossbill	*Loxia leucoptera*	S5 (2015)	Yellow	G5 (2016)			Y	Possible
White-winged Scoter	*Melanitta deglandi*	S4S5 (2015)	Yellow	G5 (2020)			Y	Possible
Willow Ptarmigan	*Lagopus lagopus*	S4S5 (2015)	Yellow	G5 (2016)			N	Possible
Wilson's Phalarope	*Phalaropus tricolor*	S4B (2023)	Yellow	G4 (2025)			Y	Unlikely
Wilson's Snipe	*Gallinago delicata*	S5 (2023)	Yellow	G5 (2016)			Y	Confirmed
Wilson's Warbler	*Cardellina pusilla*	S5B (2015)	Yellow	G5 (2016)			Y	Confirmed
Wood Duck	*Aix sponsa*	S4B,S4N (2015)	Yellow	G5 (2016)			Y	Possible
Yellow Warbler	*Setophaga petechia*	S5B (2015)	Yellow	G5 (2016)			Y	Confirmed
Yellow-bellied Flycatcher	*Empidonax flaviventris*	S4S5B (2022)	Yellow	G5 (2016)			Y	Confirmed
Yellow-bellied Sapsucker	*Sphyrapicus varius*	S5B (2015)	Yellow	G5 (2016)			Y	Possible
Yellow-rumped Warbler	*Setophaga coronata*	S5B (2015)	Yellow	G5 (2016)			Y	Confirmed