

From: [Sevn.Bohnet](#)
To: [Matthew.Jenner](#)
Subject: FW: Sodium Cyanide load
Date: June 14, 2019 11:46:40 AM
Attachments: [image001.png](#)

FYI

From: Cheryl.Anderson
Sent: June 14, 2019 11:41 AM
To: Sevn.Bohnet
Subject: Sodium Cyanide load
Good day Sven,
Just had a load come from Skagway June 14 at 11:30



Cheryl Anderson
Assistant Manager
Highway & Public Works | Carrier Compliance
T 867-667-5697 | F 867-393-6408 | Yukon.ca

From: [Sevn.Bohnet](#)
To: [Briar.Young](#)
Subject: RE: Note on Strata Gold
Date: June 18, 2019 11:54:18 AM
Attachments: [image002.png](#)
[image003.png](#)

I am hoping to discuss this with you as one of the items via the Bilat tomorrow am if you are available. In any case here is an initial draft update.

- On May 29, 2019 NRO Matthew Jenner Inspected the SGC Eagle Gold Mine. Matt was advised by site staff that SGC plans to load ore on the heap leach pad on or about July 1, 2019.
- Several plans required approval from the Water Board and Minerals before SCG is authorized to load ore and use cyanide on the heap. On June 10, 2019 SGC was reminded of the requirements in the report of the May 29th inspection.
- On June 12, 2019 SGC received approval from Minerals of the Cyanide Management Plan (CMP) submitted under the QML. This same plan also requires receipt of approval by the Water Board prior to storage and use on site.
- On June 14, 2019 Matt followed up by email with SGC acknowledging the MRB approval of CMP by MRB and requested notification of when SCG planned to receive cyanide on site.
- SGC responded on June 14 to CMI indicating the first shipment was received on June 13, 2019.
- On June 16, 2019 CMI received notification that additional cyanide arrived on site June 15 amounting to half of the initial order with the remainder to arrive over the next two weeks.
- The arrival of cyanide on site in advance of all approvals (specifically the YWB) poses a potential conflict between the Water Licence and QML. CMI is currently monitoring the situation.
- Approval of the HLF Operations, Maintenance and Surveillance Manual by both regulators is required prior to the loading of ore on the heap. This remains under review.
- The YWB is meeting this week, this project is on the agenda and we do not know if any decisions regarding the required approvals will be made. MPY is monitoring the process.

Sevn



Sevn Bohnet

Senior Natural Resource Officer, Major Mines
Energy Mines and Resources | Compliance Monitoring and Inspections
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From: Briar.Young
Sent: June 18, 2019 10:36 AM
To: Sevn.Bohnet
Subject: Note on Strata Gold

Sevn,

Could you prepare a short update note on Strata gold that we can share with the ADM/DM that outlines this past weeks activities (i.e. QML plan approval, cyanide on site, status of WL).

It doesn't need to be fancy, just the recent facts and status and it should identify the known conflict

between the QML and WL and that we are considering options at this time. An email would be sufficient.

If you can have it by tomorrow that would be great.

Give me a call if you have any questions.



Briar Young

Director

Compliance, Monitoring and Inspections

Department of Energy, Mines and Resources

T 867-667-3136 | Yukon.ca

From: [Mathias.Juvan](#)
To: [Sevn.Bohnet](#)
Subject: cyanide
Date: June 18, 2019 4:53:29 PM
Attachments: [image001.png](#)

Hey Sevn.

Another cyanide load 2019-06-18 at 16:53

Cheers

Matt



Matt Juvan
Compliance Officer
Whitehorse Weigh Scales | Highways and Public Works
T 867-667-5729 | F 867-393-6408 | Yukon.ca

From: [Mathias.Juvan](#)
To: [Sevn.Bohnet](#)
Subject: cyanide
Date: June 18, 2019 5:29:22 PM
Attachments: [image001.png](#)

AND another one at 17:29

Cheers

Matt



Matt Juvan
Compliance Officer
Whitehorse Weigh Scales | Highways and Public Works
T 867-667-5729 | F 867-393-6408 | Yukon.ca

From: [Cheryl.Anderson](#)
To: [Sevn.Bohnet](#)
Subject: sodium load un1689
Date: June 20, 2019 11:57:36 AM
Attachments: [image003.png](#)

Hi Sevn

Here is another load that came from Skagway going to Victoria Gold tomorrow. They came thru at 11:10 June 20, 2019



Cheryl Anderson
Assistant Manager
Highway & Public Works | Carrier Compliance
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From: [Cheryl.Anderson](#)
To: [Sevn.Bohnet](#)
Subject: SODIUM LOAD UN1689
Date: June 20, 2019 12:43:25 PM
Attachments: [image001.png](#)

Here is another load that came thru at 12:10 today



Cheryl Anderson
Assistant Manager
Highway & Public Works | Carrier Compliance
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From: [Sevn.Bohnet](#)
To: [Matthew.Jenner](#)
Subject: FW: Strata Memo
Date: June 25, 2019 1:09:52 PM
Attachments: [Memo June 25 2019 EVR Strata Gold.docx](#)
[image001.png](#)

Update memo from Briar to Ed. FYI. I mentioned to him this am we are headed up next week.

From: Briar.Young
Sent: June 25, 2019 1:02 PM
To: Sevn.Bohnet
Subject: Strata Memo
FYI – sent to Ed today.



Briar Young
Director
Compliance, Monitoring and Inspections
Department of Energy, Mines and Resources
T 867-667-3136 | Yukon.ca



MEMORANDUM

June 25, 2019

To: Ed van Randen, ADM – Client Services and Partnerships
From: Briar Young, Director, Compliance Monitoring and Inspections
Re: Strata Gold (Eagle Gold Mine) status update

Ed, I am provided you with this memo update on the Eagle Gold Mine to ensure you are aware of compliance issues associated with this file.

The project is well advanced in its construction and loading of ore on the heap is expected to commence on or about July 1, 2019. Prior to loading ore on the heap leach facility, approvals under the Water Use License and Quartz Mine License (QML) are required.

On May 29, CMI inspected the mine site and has provided the company with copy of the inspection report. The report clearly identified the requirements for the outstanding plans under both the Water Use License and the QML.

On July 19, 2019, Mineral Resources Branch notified the Company that the remaining plans for the project have been approved. Material to this memo, is the approval of the Heap Leach Facility Operation, Maintenance and Surveillance Manual (approved July 19, 2019) and the Cyanide Management Plan (approved July 12, 2019).

Outstanding plans yet to be reviewed and approved by the Yukon Water Board include the Heap Leach Facility Operation, Maintenance and Surveillance Manual and the Cyanide Management Plan. The Water Use License (WUL QZ14-041) has specific conditions for these plans:

- Condition 133 – Cyanide Management Plan "Storage and use of cyanide at the site must not occur until receipt of notice of approval of the updated CMP from the Board"
- Condition 154 – Heap Leach Facility Operations, Maintenance and Surveillance Manual "must receive approval from the Board prior to loading ore in the HLF".

On June 13, 2019 the first shipment of cyanide was delivered to the mine site, on June 15 additional shipments were received on the mine site, amounting to half of the initial order with more to arrive in the next few weeks.

The storage of cyanide on the mine site is currently in non-compliance with the Water License (condition 133), but complies with the QML.

To my knowledge, ore has not yet been loaded on the to the heap leach facility. The Company is approved under the QML to load ore on the heap leach facility but is not permitted to under the Water License until such time as the Board approves the plan.

By way of the May 29, 2019 Inspection Report, CMI reminded the Company of their obligations under the Water Use License and the QML. With the storage of cyanide on site as of July 13, 2019 the Company is aware that they are in non-compliance with the Water Use License.

This is a point of conflict for CMI. Under the QML the Company is permitted to undertake the storage (and use) of cyanide. Under the Water Use License, the Company does not have approval for the storage (and use) of cyanide. While there is active non-compliance from the Company with the Water Use License, there does not appear to be danger to persons or the environment from the storage of cyanide on the mine site, which is compliant with QML.

CMI will continue to monitor the situation and assess options, at this time we are satisfied there is no immediate threat to the environment or human health, the Water Board appears to be moving towards issuance of a license, and the approvals of the same plans under the QML revealed no concerns from land and water managers in Yukon and First Nation governments.

CMI will be inspecting the site in early July 2019. Further updates will be provided as the situation changes.

Briar Young

Cc: CMI-MMU

From: [Mark Ayranto](#)
To: [Matthew.Jenner](#); [Stephen.Wilbur](#)
Cc: [Hugh.Coyle](#); [Sevn.Bohnet](#)
Subject: RE: SGC - Cyanide Transportation & Storage
Date: June 26, 2019 11:30:52 PM

Hi Matt

No problem at all on our end. Appreciate the on-going good relations we have developed and desire to continue going forward.

Best regards, Mark

Mark Ayranto | Chief Operating Officer | C: 778.888.4010

From: [Matthew.Jenner@gov.yk.ca](#)

Sent: June 25, 2019 9:08 AM

To: [Mark Ayranto](#) ; [Stephen Wilbur](#)

Cc: [Hugh Coyle](#) ; [Sevn.Bohnet@gov.yk.ca](#)

Subject: RE: SGC - Cyanide Transportation & Storage

Hi Mark,

I've just returned to the office.

I appreciate the timely notifications regarding receipt of cyanide shipments.

Thanks,

Matt

From: [Mark Ayranto <\[mayranto@vitgoldcorp.com\]\(mailto:mayranto@vitgoldcorp.com\)>](#)

Sent: June 21, 2019 4:12 PM

To: [Stephen Wilbur <\[swilbur@vitgoldcorp.com\]\(mailto:swilbur@vitgoldcorp.com\)>](#); [Matthew.Jenner <\[Matthew.Jenner@gov.yk.ca\]\(mailto:Matthew.Jenner@gov.yk.ca\)>](#)

Cc: [Hugh Coyle <\[hcoyle@vitgoldcorp.com\]\(mailto:hcoyle@vitgoldcorp.com\)>](#); [Sevn.Bohnet <\[Sevn.Bohnet@gov.yk.ca\]\(mailto:Sevn.Bohnet@gov.yk.ca\)>](#)

Subject: Re: SGC - Cyanide Transportation & Storage

Hi Matt

The final 2 containers for our first order of CN have just arrived at site.

Regards, Mark

Mark Ayranto

778-888-4010

On Jun 19, 2019, at 9:28 AM, Mark Ayranto <mayranto@vitgoldcorp.com> wrote:

Hi Matt

Containers 5 & 6 will be arriving to site within the next 2 hours. The final initial shipment (containers 7 & 8) are now expected to arrive on Friday.

Regards, Mark

Mark Ayranto | Chief Operating Officer | C: 778 888.4010

From: [Mark Ayranto](#)

Sent: June 16, 2019 5:57 PM

To: [Stephen Wilbur <\[swilbur@vitgoldcorp.com\]\(mailto:swilbur@vitgoldcorp.com\)>](#); [Matthew.Jenner <\[Matthew.Jenner@gov.yk.ca\]\(mailto:Matthew.Jenner@gov.yk.ca\)>](#)

Cc: [Hugh Coyle <\[hcoyle@vitgoldcorp.com\]\(mailto:hcoyle@vitgoldcorp.com\)>](#); [Sevn.Bohnet <\[Sevn.Bohnet@gov.yk.ca\]\(mailto:Sevn.Bohnet@gov.yk.ca\)>](#)

Subject: RE: SGC - Cyanide Transportation & Storage

Hi Matt

Containers 3 & 4 (of 8 total in the initial order) arrived at site yesterday am. I was travelling to site earlier today and having just arrived was unable to send a note earlier in the day.

The current schedule has containers 5 & 6 showing up this coming week and containers 7 & 8 arriving the week of June 24. As noted above this will complete the initial order.

Best regards, Mark

Mark Ayranto | Chief Operating Officer | C: 778 888.4010

From: [Stephen Wilbur <\[swilbur@vitgoldcorp.com\]\(mailto:swilbur@vitgoldcorp.com\)>](#)

Sent: June 14, 2019 2:15 PM

To: [Matthew.Jenner <\[Matthew.Jenner@gov.yk.ca\]\(mailto:Matthew.Jenner@gov.yk.ca\)>](#)

Cc: [Hugh Coyle <\[hcoyle@vitgoldcorp.com\]\(mailto:hcoyle@vitgoldcorp.com\)>](#); [Sevn.Bohnet <\[Sevn.Bohnet@gov.yk.ca\]\(mailto:Sevn.Bohnet@gov.yk.ca\)>](#); [Mark Ayranto <\[mayranto@vitgoldcorp.com\]\(mailto:mayranto@vitgoldcorp.com\)>](#)

Subject: RE: SGC - Cyanide Transportation & Storage

Matt – in response to your request, we received the first shipment of cyanide yesterday.

I will touch base with our supply chain manager regarding the planned schedule for cyanide transportation and storage and then get back to you.

Have a great weekend.

Cheers

Steve Wilbur | Director of Technical Services | C: 604.790.4598

From: [Matthew.Jenner <\[Matthew.Jenner@gov.yk.ca\]\(mailto:Matthew.Jenner@gov.yk.ca\)>](#) <Matthew.Jenner@gov.yk.ca>

Sent: Friday, June 14, 2019 1:55 PM

To: [Stephen Wilbur <\[swilbur@vitgoldcorp.com\]\(mailto:swilbur@vitgoldcorp.com\)>](#)

Cc: [Hugh Coyle <\[hcoyle@vitgoldcorp.com\]\(mailto:hcoyle@vitgoldcorp.com\)>](#); [Sevn.Bohnet <\[Sevn.Bohnet@gov.yk.ca\]\(mailto:Sevn.Bohnet@gov.yk.ca\)>](#)

Subject: SGC - Cyanide Transportation & Storage

Good Afternoon Steve,

I am following up on my inspection report issued to SGC on June 10, 2019 to acknowledge the recent approval of the Cyanide Management Plan Version 2019-01 under your Quartz Mining License QML-0011 as communicated to SGC by Mineral Resources Branch on June 12, 2019.

At this time I request that you notify me of your planned schedule for cyanide transportation and storage. Please notify within 24 hours of the cyanide arriving and being stored on site and include the date and time of when the material arrives.

Regards,

Matt

Matthew Jenner

Natural Resource Officer | Inspector, Major Mines Unit
Energy Mines & Resources | Compliance Monitoring & Inspections
T 867-334-6144 | Yukon.ca