

# **NEWCRETE INVESTMENTS LTD. VICTORIA RIVER QUARRY PERMIT**

## ***Environmental Assessment Registration Document***

Submitted by:

**Newcrete Investments Ltd.**  
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December 20, 2022

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## **1.0 NAME OF UNDERTAKING**

Victoria River Quarry Permit Application

- Quarry Permit Identification
  - File 711:12955 covering 5.5 ha
- Environmental Assessment Registration Identification
  - File Reference No. 200.20.3122

## **2.0 PROPOSER**

### **2.1 Name of Corporate Body**

Newcrete Investments Ltd.

### **2.2 Address**

2800 Trans-Canada Highway  
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### **2.3 Chief Executive Officer**

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## 3.0 THE UNDERTAKING

### 3.1 *Nature of the Undertaking*

The proposed project, referred to as the Victoria River Quarry, is a 5.5 ha quarry permit application area adjacent to Victoria River, (File #711:12955) located ~50 km south-southwest of the Town of Buchans, 61 km southeast of the town of Millertown and ~7 km north-northeast of Victoria Lake (**Figures 1 to 5**). The project will be developed under a quarry permit for sourcing sand and gravel material to be used for aggregate production in order to supply Newcrete Investment's (Newcrete) operations within the Central Newfoundland region.

### 3.2 Purpose/Rationale/Requirement for the Undertaking

The main purpose/rationale of this project is to source sand and gravel material to support Newcrete's operations in the Central region which include, but are not limited to, ongoing aggregate product demand, the production of road maintenance material including winter sand and potential concrete production for the nearby Marathon Gold Corporation Valentine Lake Gold Project.

The quarry site is accessible via ~80 km of established truck drivable roads including a series of developed and maintained mining roads, logging roads, and mineral exploration access roads. The developed mining roads from Teck Resource's former Duck Pond Gold Mine travel southwest from the Town of Millertown for ~8 km, before turning onto the branching logging road along Red Indian Lake. The quarry is located ~60 km westward along this road before travelling ~25 km southwest along a regularly maintained access road which branches ~160 m eastward, directly into the quarry area (**Figures 2 to 4**). The access route noted above has been regularly maintained for general access by various operations in the region including the Marathon Gold Corporation Valentine Lake Gold Project.

## 4.0 DESCRIPTION OF THE UNDERTAKING

### 4.1 Geographic Location

The project is located ~19 km southwest of Red Indian Lake, and ~7 km north-northeast of Victoria Lake in Central Newfoundland, on NTS Map Sheet 12A/06 (**Figures 1 and 2**). The quarry application area is on crown land, within a Department of Fisheries, Forestry and Agriculture Silviculture Zone boundary. The permit also sits within an active Outfitter area, as such, Newcrete has committed to contacting the involved group to mitigate any potential conflicts as required by the Department of Tourism, Culture, Arts and Recreation.

The immediate quarry area quarry is remote and has a long history of mineral exploration and quarry development. Rob's Grader Services & General Contracting's 0.5 ha developed (File #711:10506 / Permit #143904) quarry area sits immediately adjacent to the southern permit area boundary (**Figures 3 and 4**). Marathon Gold Corporation's

Valentine Lake Gold Project camp is located ~9 km southwest of the project area, with the nearest mineral showing being a trenching area ~450 m to the west.

As there are multiple ongoing operations within the area, the intermittent sand and gravel extraction and processing activities within the quarry are not anticipated to have an effect on nearby receptors any more than the other current operations in the region. The receptors near the project area include the two stationary bus cabins shown on **Figure 5**. The closest of which is an abandoned and derelict bus cabin located ~95 m to the southeast, adjacent to Rob's Grader Services & General Contracting's quarry (File #711:10506 / Permit #143904). The second receptor is an active bus cabin located on an isolated piece of land surrounded by Victoria River, ~115 m to the northeast, across two abandoned bridges which are no longer truck drivable. This active bus cabin is an illegitimate dwelling, as it is untitled and holds no tenure for the land as per the Land Use Atlas.

## 4.2 Physical Features

### 4.2.1 Project Site Description

Elevations within the 5.5 ha quarry area extend from ~280 m to ~300 m asl (above sea level), increasing eastwards towards the permit boundary before decreasing again adjacent to Victoria River. The increased land elevation along the eastern permit boundary is attributed to an esker running the length of the permit area, which is host to an existing historic quarry face towards the south (**Figure 4**). The extraction of the sand and gravel resource material from this esker will be the focus of the production efforts within the quarry. The construction and operation plans are discussed in **Section 4.3**.

Victoria River is located ~30 m east of the quarry area, with a small 1 m to 3 m wide stream flowing westward from the river, running along the northern and western permit boundary (**Figures 3 and 4**). This small stream is ~50 m from the application area's boundary, allowing development to maintain the 50 m buffer to watercourses as required by the Department of Industry, Energy and Technology (DIET), Mineral Lands Division and the Department of Fisheries, Forestry and Agriculture (DFFA), Wildlife Division. However, it has been requested that a reduced buffer zone of 30 m be permitted adjacent to Victoria River east of the quarry. The reasoning for the reduction of this buffer zone is presented in **Section 4.3.1**. A ~ 1.99 ha wetland area is located ~ 80 m southwest from the permit boundary at its closest point, easily allowing development to maintain the required 30 m buffer (shown on **Figures 3 and 4**).

An overgrown and abandoned logging road which is now only passable by an ATV, transects the quarry permit area towards the northeast, away from the quarry entrance. The ATV trail exits the northeastern area boundary, continuing towards the previously mentioned bus cabin ~115 m from the quarry application area, across the derelict abandoned bridges as shown on **Figures 3 and 4**. This access trail will be maintained for general access throughout the construction and production phases of this quarry, and will be relocated to its original location after production has finished, as presented in **Section 4.3.2**.

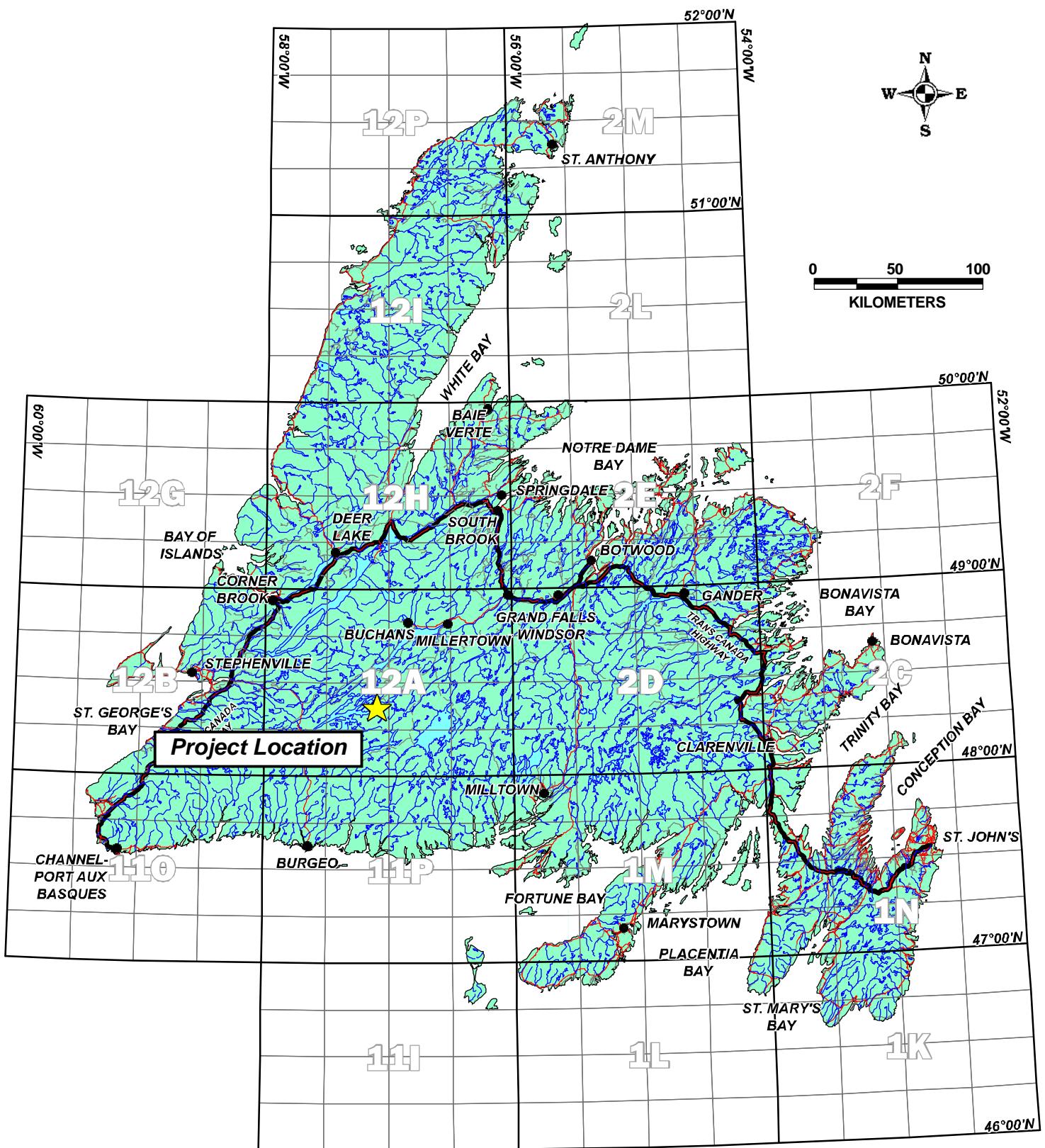


Figure 1: Project Location Map (N.T.S. 12A/06)



Figure 2: Intermediate Quarry Area Location Map

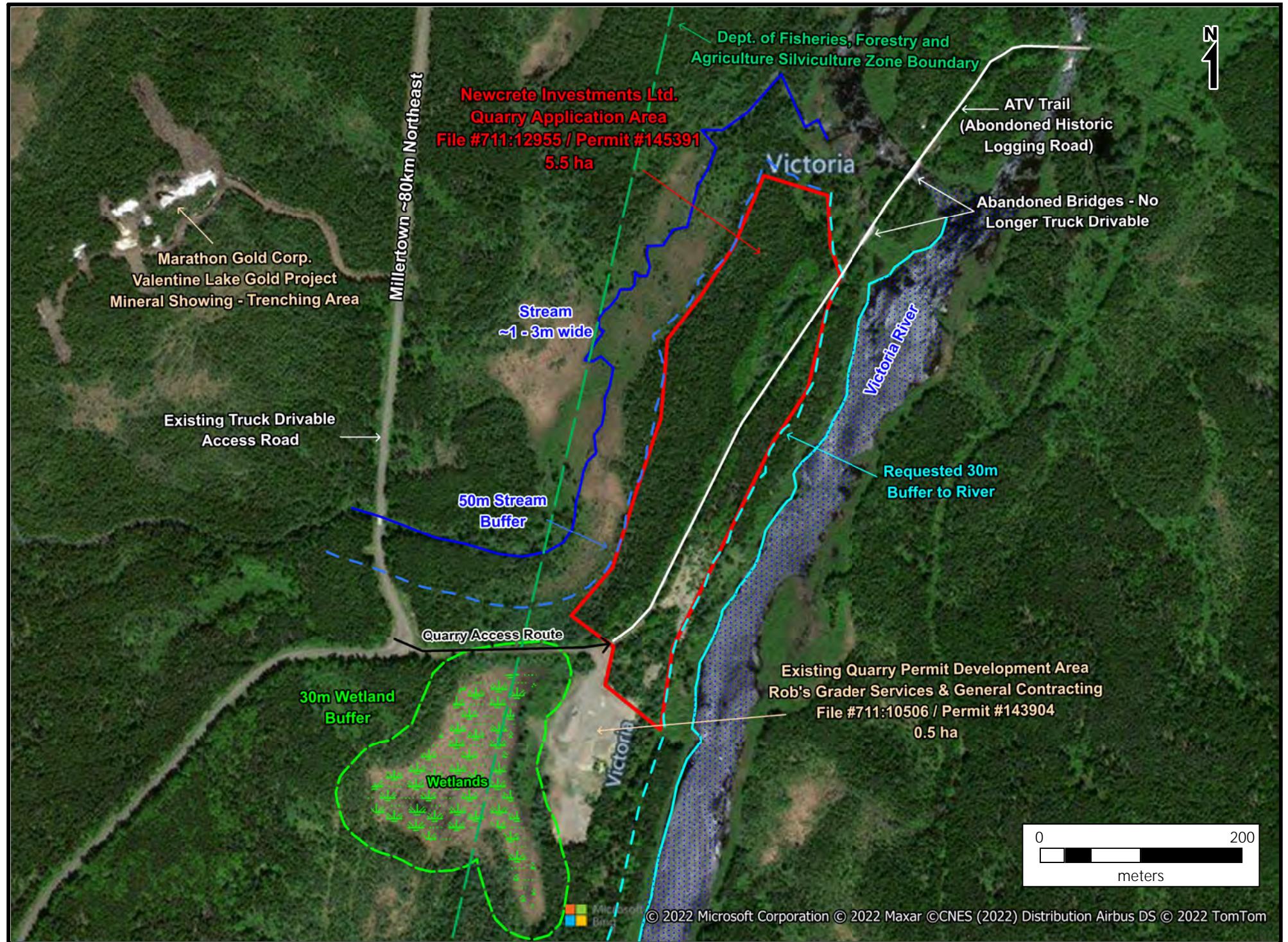


Figure 3: Quarry Permit Location Map

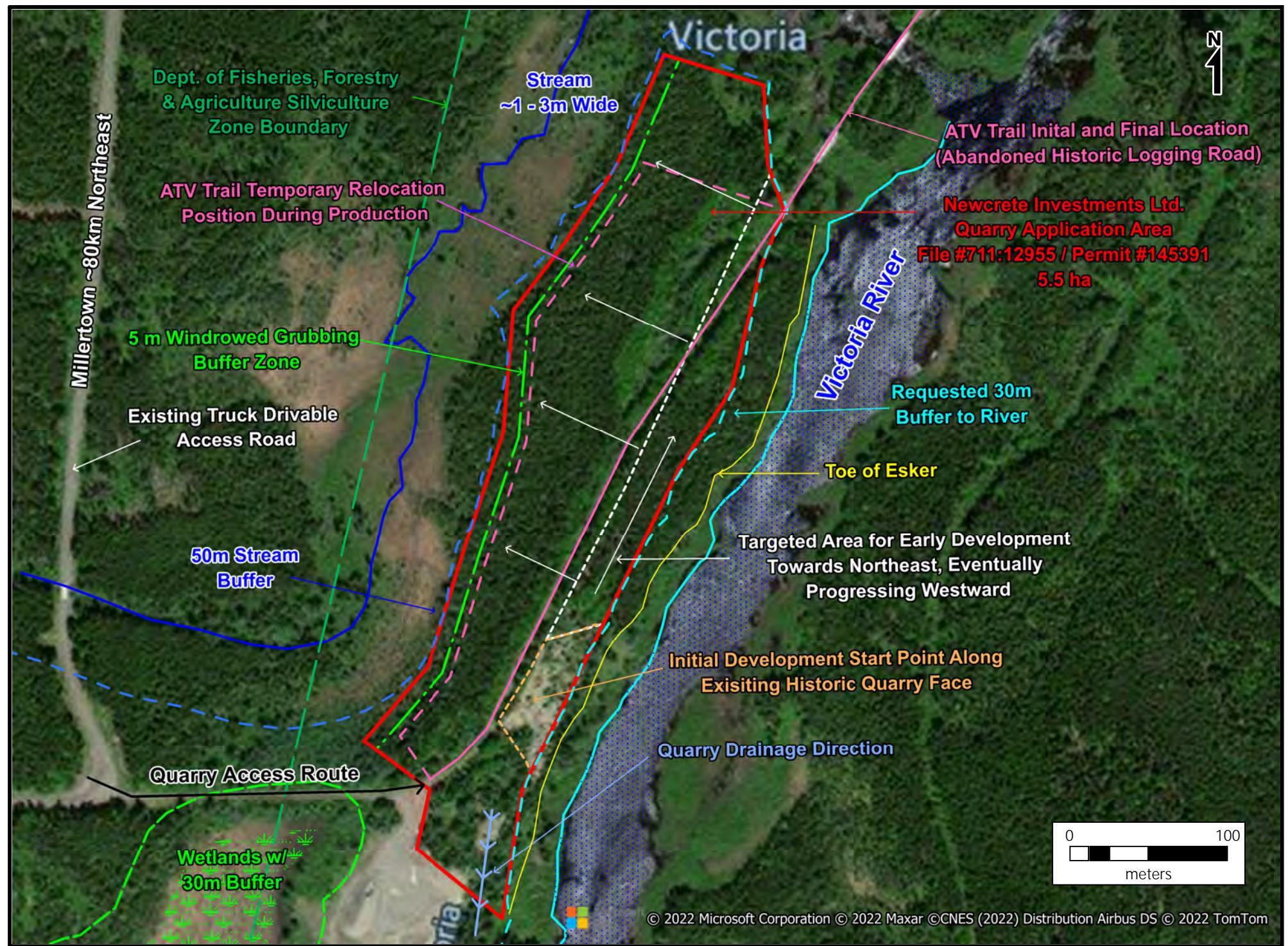


Figure 4: Detailed Quarry Location Map

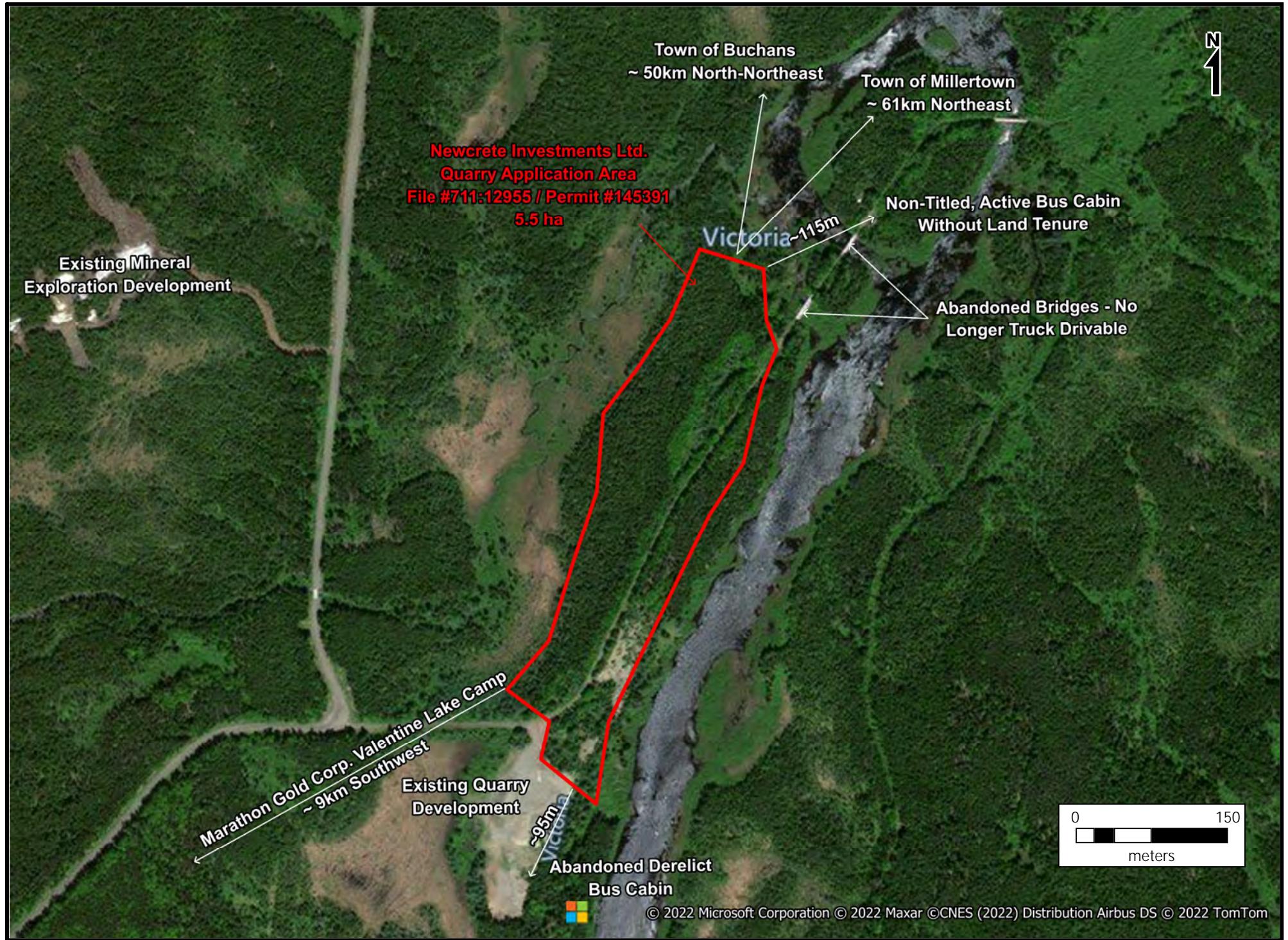


Figure 5: Receptor Location Map

#### **4.2.2 Existing Biophysical Environment**

The permit area is located within the *Central Newfoundland Ecoregion* of the provinces *Middle Boreal Zone*. This ecoregion covers the most continental part of the island and therefore experiences less Maritime weather conditions than areas closer to the coastline. The Atlantic Ocean still heavily influences the climate of this ecoregion, with cool summers and moderate winters, although it sees generally hotter summer temperatures and drier, colder winters than coastal areas. The mean annual temperature is 4.5°C, with a mean summer temperature of 12.5°C and a mean winter temperature of -3.5°C. With the more continental nature of this ecoregion, it is generally host to lower precipitation amounts than some of the more maritime influenced areas of the province, with an annual range from 1000 mm to ~ 1300 mm.

The topography of the higher elevations within the region are characterized by rugged and rocky terrain while the low-lying areas tend to have a gentler rolling terrain. Balsam fir and black spruce are the dominant tree species in this region with some birch and aspen growth in the lower elevation areas. Some areas lack healthy forest growth due to exposure to winds and poor soil conditions. Kalmia heath and some lichens are found on drier sites. Conditions in this broad ecoregion are suitable for black bear, caribou, moose, fox, coyote, and lynx.

### **4.3 Construction, Operation and Maintenance**

The construction aspect of the proposed project will be minimal in nature, as no upgrading of the existing access roads or installation of any water crossing infrastructure will be required. Construction of the site will simply involve the clearing of trees and grubbing from the quarry area before development proceeds. All merchantable timber that needs to be cleared will be garnered under a commercial cutting permit issued by the Department of Fisheries, Forestry and Agriculture.

The development operations of this quarry will generally travel northeast, starting at a historic quarry face, away from the quarry entrance before eventually branching westward, extracting sand and gravel material from the esker (as shown on **Figure 4**). The clearing of organics and forested areas will happen in phases, as dictated by the development and demand, in order to minimize disturbances of the land within the quarry area.

#### **4.3.1 Victoria River Buffer Adjustment**

The 50 m buffer zone to all watercourses as required by DIET's Mineral Lands Division and DFFA's Wildlife Division will be maintained between the 1 m to 3 m wide adjacent stream and the western and northern permit boundaries. However, it is being requested that the buffer to Victoria River along the eastern permit area boundary be reduced from 50 m to 30 m. The reasoning for this request is discussed below.

Within the quarry permit location, there has already been historic quarrying within the 50 m buffer zone adjacent to the river. This development is decades old and has been attributed to the construction of logging roads and the Victoria Lake Reservoir Dam. The area has also seen more recent quarry development to the south.

Previous field work completed under Quarry Materials Exploration License QMEL: 705:1812 within the permit area has indicated that the higher quality sand and gravel material within the esker is focused along the eastern edge of the ridge. The request to quarry within the 50 m buffer has been put forward because a significant portion of the more suitable material within the esker (**Figure 4**) sits within the 50 m and 30 m buffer zone from the river.

From a production perspective, the reduced buffer is requested to complete efficient development within the area. In addition to the 30 m buffer providing adequate distancing from the adjacent watercourse, approvals from several other agencies, including Water Resources, have previously required a 30 m buffer, as this buffer area is a common requirement in other similar industries such as logging. Additionally, the operations to remove material from the esker within the buffer zone will be small in scale, with production in this area only covering ~ **0.8 ha** adjacent to the river.

Furthermore, the quarry operations and effluent controls outlined in **Section 4.3.** and **Section 4.4**, have put forth reasonable plans to mitigate interaction with the river. It is also important to note that the quarry face will not proceed past the eastern toe of the esker along the river, allowing for a natural barrier between the quarry development and the watercourse (**Figure 4**). As Newcrete will follow all requirements of the quarry permit approval to prevent unnecessary disturbance to the watercourse, it is requested that the 50 m buffer be reduced in this case.

#### **4.3.2 ATV Trail and Quarry Access Maintenance**

An abandoned logging road now utilized as an ATV trail runs northeast for ~430 m through the quarry area, exiting in the northeastern corner of the permit and continuing from the boundary (**Figures 3 and 4**). To maintain local use of this trail for woodcutting, recreation, and outfitter access to the northeast, Newcrete will maintain the portion of the trail within the permit area during the construction and development stages of the quarry operations. As the trail sits within the development footprint along the eastern permit boundary, Newcrete will adjust the trail, moving it westward as production progresses. While the quarry is under active development, the ATV trail will sit along the western permit boundary adjacent to the 5 m buffer zone (**Figure 4**). Once the targeted materials within the quarry permit area have been exhausted, the ATV trail will be relocated to its original location as shown on **Figure 4**. Access will always be provided along the trail to the bus cabin and areas beyond.

Clearing the adjusted path of the ATV trail within the quarry permit area will involve the clearing of trees and some organics. All merchantable timber that needs to be cleared will be done by either handheld chainsaws or mechanical harvesting equipment and will be garnered under a commercial cutting permit issued by the Department of Fisheries, Forestry and Agriculture. Maintenance of the trail will primarily be completed by an excavator/bulldozer (for a list of required personnel see **Section 4.6**). A berm of grubbing material will be maintained between the trail and the active operations at all times.

The quarry access route entering the quarry is a gravel road which will, over time, typically require maintenance. This will be completed by utilizing an excavator to smooth or fill in ruts, settled areas and potholes as required. This may require the additional placement of material from the quarry for the purpose of road upkeep (for a list of required personnel see **Section 4.6**).

#### ***4.3.3 Site Clearing***

As the permit area hosts forested sections along the esker, tree removal will be required for development. As noted above, merchantable timber will be cleared either by handheld chainsaws or mechanical harvesting equipment and will be stacked in 6 to 8 feet lengths where possible. All merchantable timber that needs to be cleared during road construction will be garnered under a commercial cutting permit issued by the Department of Fisheries, Forestry and Agriculture.

Surficial soils, subsoils and organic grubbing will be stripped and windrowed to give a 5 m buffer to the permit boundary (**Figure 4**). This windrowed material will be used to construct perimeter berms and will be preserved for future reclamation and to control access to the quarry face from the adjacent maintained ATV trail as required. Additional removed grubbing material will be stockpiled on site.

It is important to note that initial development of this quarry area will not take place across the entire 5.5 ha area immediately. To minimize disturbance of the land within the quarry area and for the practicality of production and operations, development will be undertaken in stages. Therefore, the site clearing will be taking place only within areas required for development to progress.

#### ***4.3.4 Quarry Construction, Development and Operation***

The quarry construction work will consist of clearing the site from trees and grubbing while removing, windrowing, and stockpiling organics as mentioned in **Section 4.3.3**. The general area and direction of development shown on **Figure 4** is preliminary and may be adjusted during later planning stages. Annual production from the site is anticipated to be ~10,000 m<sup>3</sup> per year but this amount can vary depending on market demand and individual contract requirements. Due to the remote, rural location of the permit area, quarry workings will not be visible to any public areas.

The initial stages of development in the quarry will begin along the southeastern permit boundary, at the existing historic quarry face, and work towards the northeast. The quarry face's location adjacent to the quarry entrance makes it the most practical starting point for operations. Production will extract the sand and gravel material from the esker adjacent to the eastern boundary, gradually moving westward once the targeted material in that portion of the esker has been exhausted. Newcrete will be regularly maintaining the ATV trail access as development eventually progresses westward.

During production, extraction activities will consist of removing the sand and gravel material by heavy equipment, such as excavators, front-end loaders, and dump trucks (see **Section 4.6** for a list of anticipated employees required). All extraction activities will adhere to the Government of Newfoundland and Labrador's Occupational Health and Safety Regulations under the Occupational Health and Safety Act, including maintaining a maximum quarry face height of 5 m.

To mitigate any interaction with the adjacent watercourse, operations during development will implement drainage ditching along the 30 m river buffer within the quarry area, which will be maintained to direct site water back towards the access road (**Figure 4**). Additionally, Newcrete will install check dams, hay bales and silt fencing within the drainage ditches for sediment control. If required, depressions can be created on the quarry floor with small settling sumps in place to contain site water.

Processing activities within the permit area will involve the extracted material being crushed and screened into the required aggregate sizing before being stockpiled on site. While the use of water for the washing of material is not currently anticipated, future contractual requirements may require this. Any use of water for processing activities will be done under approval from the Water Resources Management Division. Water use drainage will be tied into the previously presented drainage controls in place from development operations and will carefully monitored along with the general site drainage for effluent control.

Due to potential forthcoming contractual obligations, typical quarrying activities are slated to take place as soon as possible within the permit area. With the anticipated approval times and the anticipated release from EA review, this is expected between February and March but will ultimately be dictated by the timing of approval and severity of winter conditions.

#### **4.4 Potential Sources of Pollution During Construction and Operation**

The construction and operational phases of the development will utilize equipment such as chainsaws, timber harvesting equipment, excavators, bulldozers, and dump trucks. The equipment and related activities represent a potential source of noise and vibrational

disturbance, exhaust emissions, the potential release of petroleum hydrocarbons, dust, domestic waste, and general refuse.

#### **4.4.1 Air**

Air pollution will be controlled by having all equipment on site fitted with the appropriate emission controls. Site clearing will be completed in phases, with only areas required for production cleared, reducing the overall potential of excessive dust and pollution impacts. Dust created by equipment operation along the quarry entrance road will be kept at a minimum by the watering of roads if required. All activities within the quarry will be conducted in a manner that respects the province's *Air pollution Control Regulations (2004)*.

#### **4.4.2 Noise and Vibration**

The extraction and processing operations of the quarry site are not anticipated to have an effect on nearby receptors anymore than the adjacent quarry or the mineral exploration operations in area. The site will not be under continuous operation but more intermittent as demand dictates. All equipment will be kept in good operating order to ensure that maximum manufacture decibel levels produced are not exceeded. Workers will have the proper hearing protection and the work site will be a controlled work environment.

#### **4.4.3 Domestic Waste and Sewage**

Domestic waste generated during construction and operation will be collected and disposed of in accordance with the Environmental Protection Act 2002. Portable lavatories will be located within in the proposed quarry boundaries and will be utilized as required. An approved sewage service provider will remove the waste.

#### **4.4.4 Fuel**

Diesel fuel will be required to be stored onsite to run development and processing equipment. As such, all required permitting including the Registration of Gasoline and Associated Products and a Mobile Fuel Storage Tank Relocation Permit will be acquired from the Government Service Branch – Operations Division of the Government of Newfoundland & Labrador. Fuel storage tanks will also comply with the required Storage Tank System Test from Service NL. The handling of petroleum products on site will comply with the Storage and Handling of Gasoline and Associated Products Regulations. All fuel stored on site will be placed in a spill tray that would exceed the capacity of the storage unit placed within it.

Fuel storage areas will be regularly checked, and emergency spill kits will be available on site at all times for containment and cleanup of any hydrocarbon leaks. All equipment will be kept in good operating order with regular inspections in an effort to proactively prevent spill incidents and identify leaks. Any leaks or spills in excess of 70 liters or any amount

of fuel interacting with Victoria River will be cleaned up and immediately reported to the Provincial Environmental Emergency Telephone Line.

#### **4.4.5 Effluent**

There is a potential for erosion and the transport of fine-grained particles during construction activities in relation to clearing of the land. This will be monitored on a constant basis during construction while clearing takes place and, if required, appropriate mitigating measures in line with industry best management practices will be utilized.

The first step will be creating erosion control ditches with check dams, hay bales, and silt fencing to filter water leaving the site. Site runoff will then be directed towards the vegetated area to the south, which will function as a filter for fine particles (**Figure 3**). Gradual development of the site will ensure that the organic layer will not be stripped all at once, reducing the amount of erosion. The same process will be applied for the operational phase of the project. If required, small shallow depressions with settling sumps on the quarry floor may be constructed to temporarily hold water. This allows for suspended sediment to deposit prior to water being released into vegetated areas along with the ditches, check dams, and silt fencing. All water released into the environment will meet the regulatory requirements of the *Environmental Control Water and Sewage Regulations* (2003) as well as provincial permits.

### **4.5 Potential Resource Conflicts During Construction and Operation**

Potential conflicts during construction and operation of the quarry could include the following: encounters with wildlife, the use of the area by locals for recreational and hunting purposes, interaction with outfitter groups, salmon fishing and domestic wood cutting.

Any encounter with wildlife shall follow regulations stated in the Wildlife Regulations under the *Wildlife Act* (CC. 96-809). The permit area is within an identified waterfowl zone, as such, operations will follow the *Migratory Birds Convention Act* (1994, Migratory Bird Wildlife Act) regulations and apply preventative measures to avoid incidental disturbance or destruction of bird nests and eggs.

While Victoria River is a scheduled salmon river, no disruption to local salmon fishing is anticipated due to the location of the permit application area being far removed from the salmon fishing locations further to the north-northeast. The salmon migration path for this region starts ~ 230 km northeast from the Norris Arm inlet, travelling southwest down the Exploits River (which hosts many of the popular fishing spots within the area) towards Red Indian Lake. The salmon would then need to travel another 51 km from Red Indian Lake, down Victoria River, to reach the portion of the river adjacent to the permit area. Furthermore, the permit area sits adjacent to the headwater zone in the river from the nearby Victoria Dam (**Figure 2**), which is located ~ 6 km southwest of the permit area.

With the adjacent Victoria Dam and the immense distance from the popular salmon fishing locations to the northeast, no potential conflicts are expected.

The remote region is generally utilized for local hunting, outfitting outdoor activities, and recreational activities by locals. However, the construction and operation of this quarry area is not expected to cause any significant disturbance for local access to the more remote, non-developed areas further northeast of the quarry. This is due to the existing ATV trail within the permit area being maintained by Newcrete for general access use throughout the construction, development, and operation of the quarry (**Figures 3 and 4**).

As the trail migration and maintenance will be ongoing, measures including signage and berms will be utilized to limit unauthorized access to the site. Only the active working areas and quarry face will be bermed, the access road and the ATV path will not be restricted so that they can continue to be utilized by all.

As the quarry sits near the edge of a 16 km wide active outfitter buffer area, Newcrete has committed to engaging with Notch Mountain Outfitters in order to mitigate any potential conflicts, as required by the Department of Tourism, Culture, Arts and Recreation.

The 5.5 ha project lies within a former ~6,100 km<sup>2</sup> area of Abitibi Chartered Land, the majority of which is remote forested space. As such, the immediate use of land for domestic cutting is anticipated to be minimal because of the remote nature of the project and the amount of merchantable timber in the surrounding region.

Throughout the construction and operational activities in the quarry, the 50 m buffer between the adjacent stream and the north and eastern permit boundaries will be maintained, as will the requested 30 m reduced buffer to Victoria River (shown on **Figure 4**). These buffers will allow the quarry to maintain required adequate distance from all waterbodies (including wetlands) as per the Water Resources Management Division of the Municipal Affairs and, upon buffer approval, the Mineral Lands Division from the Department of Industry, Energy and Technology of the Government of Newfoundland and Labrador.

The following quarry development plan will be applied as a precautionary measure to prevent suspended solids from reaching any watercourses:

- Within the proposed quarry area, a 5 m wide buffer will be left intact where no resources will be excavated alongside the western quarry boundary (shown on **Figure 4**). Berms constructed from the windrowed organics will be placed within the 5 m buffer area.
- A natural buffer between the quarry and the river, provided by the toe of the esker along the riverbank, will be maintained.

- Water from precipitation and overland flow for the entire site will be controlled using the mitigation measures previously mentioned in **Section 4.3 & Section 4.4**
- The pit floor will be kept lower than the perimeter berms where present as development progresses to contain precipitation water within the quarry site and confine any suspended solids to within the quarry area. The flow will also remain higher than the elevation of Victoria River to prevent and percolation of water into the quarry area.

## 4.6 Occupation

The occupations required for the proponent's site are listed below and classified as per the National Occupational Classification (2016):

### ***Construction***

- 1 Quarry Supervisor (8221)
- 2 Heavy Equipment Operators –Excavator/Dump Truck (7521)
- 1 Heavy Equipment Operator – Tree Harvester/Mulcher (7521)

### ***Operation***

- 1 Quarry Supervisor (8221)
- 1-2 Heavy Equipment Operator – Loader/Excavator (7521)
- 1 Heavy Equipment Operator – Screener (7521)
- 2-3 Heavy Equipment Operators – Tandem or Semi Dump Trailers (7521)

The construction phase of the project will require up to 4 employees to complete. Operation of the quarry will generally require 5 - 7 employees to run when fully active at the anticipated production rate of ~10,000 m<sup>3</sup> annually. Fluctuations in material demand may lead to a change in the number of required employees and annual production.

## 4.7 Reclamation and Closure

The project will be rehabilitated as per the standard conditions of a quarry permit to be issued by the Department of Industry, Energy and Technology. The post development reclamation efforts in the quarry will involve sloping the exposed quarry face to 30 - degrees with windrowed grubbing material and re-spreading the remainder of the organic material that is stripped during the development, from the onsite stockpiles, over all disturbed areas in the quarry to promote natural revegetation.

## 5.0 APPROVAL OF THE UNDERTAKING

**Table 1** contains a list of referral agencies, responses received to date, and possible permits required for the project, some of which are already in progress.

**Table 1: Referral Agencies, Responses and Possible Permits Required**

Department/Regulatory Agency	Status	Possible Required Approvals/Permits
Municipal Affairs and Environment - Land Use Planning	Approved	
Municipal Affairs and Environment - Water Resources Management Division	No response	
Municipal Affairs and Environment - Environmental Assessment Division	Project Registration Required	Environmental Assessment Registration
Industry, Energy and Technology - Mineral Lands Division	Conditional Approval	Reduced River Buffer Approval & Quarry Permit
Industry, Energy and Technology – Electricity and Alternative Energy	Approved	
Tourism, Culture, Arts and Recreation - Tourism	Conditional Approval	Contact Notch Mountain Outfitters to Mitigate Conflict
Tourism, Culture, Arts and Recreation - Archaeology	Approved	
Tourism, Culture, Arts and Recreation - Parks	Approved	
Service NL	No Response	
Fisheries, Forestry and Agriculture - Fisheries	Approved	
Fisheries, Forestry and Agriculture - Forestry	Approved	Operating Permit & Commercial Cutting Permit
Fisheries, Forestry and Agriculture - Crown Lands	Approved	
Fisheries, Forestry and Agriculture - Land Management	Approved	
Fisheries, Forestry and Agriculture - Wildlife	Conditional Approval	Reduced River Buffer Approval

## **6.0 SCHEDULE**

The proposed schedule for this project is as follows:

Submission of Registration Document	December 2022
Review of Submission Document by Government	February 2022
Commencement of Construction and Operations	February-March 2022

Newcrete would like to commence operations within the permit area as soon as possible once all approvals are received and the project is released from EA review.

## **7.0 FUNDING**

Funding for the construction and operation of project will be provided entirely by the proponent.

## **8.0 LIMITATIONS**

This environmental registration document was prepared by NCD Consulting Ltd. in consultation with Newcrete Investments Ltd. for their use under the terms defined in a written contract between the two parties. The information included in this document was provided by the client and relates to the scope of this project exclusively. NCD Consulting Ltd. has collaborated with the client and utilized NCD's combined extensive knowledge in quarry development and potential environment related concerns to, as accurately as possible and with the information available, layout the development of the site in a safe and environmentally sustainable manner.

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Name: Mr. Jason Coish

Position: Senior Vice President  
Newcrete Investments Ltd.

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December 19 / 2022

Date