



March 13, 2023

Mackenzie Valley Land and Water Board
7th Floor – 4922 48th Street
PO Box 2130
Yellowknife, NT X1A 2P6
Attention: Kimberley Murray, Regulatory Specialist

Ms. Murray,

Re: MV2015L2-0003 Renewal, Care and Maintenance Plan

North American Tungsten Corporation Ltd. ("NATC") is pleased to provide the enclosed revised document, Care and Maintenance Plan, in relation to NATC's application for a new land use permit and Type-B care and maintenance water licence, as the existing water licence expires on January 27, 2024. NATC looks forward to the public review of the enclosed document and other documents related to the application.

Should you have any questions regarding the foregoing, feel free to contact the writer or Vicki Chan at 604.639.0847 or vchan@alvarezandmarsal.com.

Yours truly,

**North American Tungsten Corporation Ltd.
by its Monitor, Alvarez & Marsal Canada Inc.
acting in its capacity as Monitor of NATC and not
in its personal capacity**

A handwritten signature in black ink, appearing to read "Todd M. Martin". The signature is fluid and cursive.

Todd M. Martin
Senior Vice President



CARE & MAINTENANCE PLAN

CANTUNG MINE, NT

VERSION # 7

PREPARED BY NORTH AMERICAN TUNGSTEN CORPORATION LTD.

Dated: March 13, 2023

SUMMARY

North American Tungsten Corporation Ltd. (NATC or the Company) intends to continue care and maintenance of the Cantung Mine while the Company completes its plan for a permanent mine closure. This plan describes what NATC will do during the remainder of Care and Maintenance

REVISION SUMMARY

Version	Date	Summary of Changes
<i>MV2023L2-xxxx, MV2023Dxxxx</i>		
7	Mar 2023	Revised throughout to remove historical references no longer relevant, clarify roles and responsibilities, describe facilities planned for use during C&M, cross reference other current management plans, include risk reduction activities and updated checklist and frequency
<i>MV2015L2-0003</i>		
6.1	September 1, 2022	Re-submitted to the MVLWB, replaces submission of V.6. Accepted by the MVLWB in Dec 2022
6	August 8, 2022	Submitted to the MVLWB
5	April 21, 2017	Submitted to the MVLWB
4	March 31, 2016	Sent to the MVLWB for comments
3	October 12, 2015	Submitted to the MVLWB
2	October 1, 2015	Submitted to the MVLWB
1	Internal	Not Submitted

CONFORMITY

Condition	Plan Section	Comment
		[Table to be populated following licence issuance]

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GLOSSARY AND ACRONYMS

Term	Definition
A&M	Alvarez & Marsal Canada Inc., Court-appointed monitor of NATC
C&M	<i>Care and Maintenance</i>
CCAA	<i>Companies' Creditors Arrangement Act</i>
CIRNAC	Crown-Indigenous Relations and Northern Affairs Canada
Care and Maintenance	The status of a mine when it undergoes a temporary closure
Company	North American Tungsten Corporation Ltd.
Court	The Supreme Court of British Columbia
Inspector	An Inspector designated by the Minister under subsection 84(1) of the <i>Mackenzie Valley Resource Management Act</i>
Joint Sales Process	Joint sales and marketing process for the Cantung Mine and Mactung property undertaken by the Government of Canada and Government of the Northwest Territories
Mine	Cantung Mine
MVLWB	Mackenzie Valley Land and Water Board
MVRMA	<i>Mackenzie Valley Resource Management Act</i>
Monitor	Alvarez & Marsal Canada Inc.
NATC	North American Tungsten Corporation Ltd.
NT	Northwest Territories
Plan	Care and Maintenance Plan
SNP	Surveillance Network Program
Site Manager	The person or organization responsible for the implementation of routine site plans and procedures and site projects, and all H&S at site as defined in the <i>Mine Health and Safety Act</i>
TCA	Tailings Containment Area
TSF OMS Manual	Operation, Maintenance, and Surveillance Manual, Cantung Mine Tailings Storage Facility
WSCC	Workers' Safety & Compensation Commission
YK	Yukon

1.0 INTRODUCTION

North American Tungsten Corporation Ltd.'s (NATC or the Company) Cantung Mine (Mine) is located on the Flat River, approximately 275 km northwest of Nahanni Butte, 300 km north of Watson Lake, just east of the Yukon border in the Dehcho Region of the Northwest Territories (NT).

The Cantung Mine, which opened in 1962, is North America's largest tungsten producer. It was most recently operated by NATC, up until the fall of 2015 when mining and milling ceased and the site entered care and maintenance. On June 9, 2015, NATC filed for creditor protection under the *Companies' Creditors Arrangement Act* (CCAA) and Alvarez & Marsal Canada Inc. (A&M or the Monitor) was appointed as Monitor by the Supreme Court of British Columbia (the Court).

Care and Maintenance activities planned for the near-term until the start of permanent closure are a continuation of activities already underway and ongoing since 2016. NATC plans to modify some aspects to allow for flexibility and realize cost savings where possible/available. This *Care and Maintenance Plan* (the Plan) has been prepared by NATC to describe related activities planned to occur for the duration of care and maintenance of the Mine (C&M).

1.1 BACKGROUND

On June 9, 2015, NATC filed for creditor protection under the CCAA and A&M was appointed Monitor by the Court.

Subsequent to cessation of mining and operations at Cantung at or around November 16, 2015, the Monitor has managed the affairs of the Company pursuant to an Order of the Court. Funding of NATC's care and maintenance activities since November 2015 have been provided by Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC).

On November 18, 2015, the Government of Canada determined that the Mine is a New Site Requiring Remediation, as per section 6.28 of the *Devolution Agreement*. As such, the site is now a federal area under the *Mackenzie Valley Resource Management Act* (MVRMA), for which the Government of Canada is now responsible.

Prior to a decision by NATC to transition Cantung to permanent closure and remediation, NATC and the Monitor solicited third parties for any interest in a possible investment or acquisition of Cantung that would see a restart of Mine operations. In that regard, a sale and investment solicitation process was conducted by the Company and the Monitor in 2015 which did not result in a transaction. Subsequently, with the assistance of the Monitor, a re-marketing of the Cantung Mine and Mactung property (formerly owned by NATC) was undertaken by the Government of Canada and Government of the Northwest Territories (Joint Sales Process) during the period of July 2019 through March 2022. Despite interest from select interested parties, NATC and the respective governments did not identify or transact with a party to invest, acquire or otherwise partner with NATC to take a financial interest in the Mine with a possible restart of same.

In April 2022, NATC, with input from CIRNAC, decided to continue care and maintenance in the near term and transition the Mine towards permanent closure and ultimately, remediation.

1.2 SITE DESCRIPTION

The Mine site area occupies approximately 75 ha, held under surface lease by NATC. It is located within Treaty 11 Territory, the traditional territory of the Dehcho First Nations and is also within the Kaska Dena Council's asserted territory.

As illustrated in Figure 1, the Mine comprises both open pit and underground workings together with milling facilities and five tailings containment areas. The historic Tungsten townsite is located adjacent to the Mine and mill facilities on the west side of the Flat River at an elevation of 1,128 m, and includes historic residential, recreational and office/shop buildings, some of which remain in use.

The Flat River is located in a steep-sided valley with the valley bottom being approximately 500 m wide. The valley rises to mountain peaks up to 2,750 m high. Climatic conditions in this area are typically sub-arctic with an average mean annual air temperature -4.0°C ¹. Blizzard conditions during January and February are frequent but usually of short duration and maximum snow depth in the valleys during the winter averages 127 cm. The snow-free season extends from mid-May to early October. Total annual precipitation averages 551 mm¹, with approximately half occurring as rain and half as snow.

The site is accessible by air, utilizing the existing airstrip, or by the Nahanni Range Road.

1.3 PURPOSE & OBJECTIVES

The purpose of this Plan is to outline the process and procedures for carrying out C&M at the Mine site.

The objectives of the Plan are to:

- Ensure employees and contractors understand their C&M obligations;
- Support the ongoing health and safety of the C&M crew, visitors and the public;
- Prevent degradation of the environment by maintaining regulatory and corporate compliance and careful monitoring during freshet;
- Identify, protect and maintain the existing infrastructure required for C&M; and
- Satisfy compliance requirements.

1.4 SCOPE

This Plan applies to activities required to carry out C&M at the Mine site.

Although in C&M, the Mine is still considered a 'mine site' for the purposes of Workers' Safety & Compensation Commission (WSCC) and the Mines Inspection Branch.

1.5 RELATED DOCUMENTS

The documents listed in Table 1 are related to, and should be considered when, implementing this Plan, and may be updated from time to time.

1.6 PLAN MANAGEMENT AND IMPLEMENTATION

The Plan is effective upon approval. The Plan is reviewed, at minimum, annually by the Site Manager or designate and updated as needed and following issuance of new or amended authorizations to ensure alignment with relevant terms and conditions. When material changes occur, the updated document is provided to parties in accordance with the *Engagement Plan*.

A copy of this Plan is maintained on site in the administration office and in A&M's office in Vancouver.

¹ Record period of 2017-2022, Cantung Weather Station.



Figure 1: Site layout, Cantung Mine

Table 1: Related documents

Title	Author	Year	Relation to this Plan
<i>Northwest Territories Lands and Resources Devolution Agreement</i>	Government of Canada	2013	Provides federal jurisdiction for specific areas within Northwest Territories
<i>Mackenzie Valley Resource Management Act</i>	Government of Canada	1998	Enables the water licencing process
<i>Mackenzie Valley Federal Areas Waters Regulations</i>	Government of Canada	1998	Defines water use and classifies undertakings
<i>Mine Health and Safety Act</i>	Government of Northwest Territories (GNWT)	1994	Identifies worker and employer obligations on mine sites, addresses PPE and safety requirements, enables the Mines Inspector
<i>Mine Health and Safety Regulations</i>	GNWT	1995	Identifies worker and employer obligations on mine sites, addresses PPE and safety requirements
Water Licence	Mackenzie Valley Land and Water Board	2024	Identifies monitoring and reporting requirements
Land Use Permit	Mackenzie Valley Land and Water Board	2024	Permits activities to occur
Spill Response Plan	NATC	2023	Outlines fuel storage and handling
Engagement Plan	NATC	2023	Identifies interested parties, provides triggers for engagement
Waste Management Plan	NATC	2023	Describes waste management infrastructure
Water Management Plan	NATC	2023	Describes freshwater use
Operation, Maintenance, and Surveillance Manual, Cantung Mine Tailings Storage Facility (TSF OMS Manual)	NATC	2023	Describes the Tailings Containment Areas and related surveillance and reporting requirements
Landfill Management Plan	NATC	2023	Describes the landfill and outlines related management aspects

2.0 ROLES AND RESPONSIBILITIES

NATC is responsible for the Mine, including implementation and management of this Plan. Contact information for NATC is provided below.

North American Tungsten Corporation Ltd.

c/o Alvarez & Marsal Canada Inc.
 925 W. Georgia St.
 Suite 902, Cathedral Place Building
 Vancouver, BC V6C 3L2
 Ph: (604) 638-7440
 Contact:
 Todd M. Martin, Sr. Vice President
 tmartin@alvarezandmarsal.com
 or
 Vicki Chan, Vice President
 vchan@alvarezandmarsal.com

2.1 SITE MANAGER

The Site Manager or its designate is responsible for the implementation and management of the Plan. NATC staff will implement and comply with the Plan as directed by the Site Manager.

2.2 CONTRACTORS, SUPPLIERS AND VISITORS

All personnel conducting activities on site, including contractors, suppliers and visitors, are required to comply with this Plan as it pertains to their activities on site.

3.0 SITE FEATURES

3.1 SITE INFRASTRUCTURE

Mine site buildings, facilities and operating areas that may remain active (intermittently) during care and maintenance include:

- Administration building (partial²);
- Power house (partial);
- Freshwater pumphouse (partial);
- Sewage treatment plant and lift station;
- Surface maintenance shop (partial);
- Carpenter shop (partial); and
- Doghouse surrounding radio amplifier for site communications.

² Partial indicates that part of the facility is in use

3.2 MINE WORKINGS

3.2.1 OPEN PIT AND PUG PORTAL WORKINGS

The road to the open pit beyond the ventilation fans is not currently being maintained and access is restricted to authorization by the Site Manager. The pit and ventilation underground access is not accessible due to avalanche risk during the winter months, and the roads are not plowed. There are currently no issues associated with the open pit workings, and none anticipated for the duration of C&M.

3.2.2 UNDERGROUND WORKINGS

The underground mine access has been closed. All access to the underground has been secured with locked doors to prevent unauthorized entry. Access to the underground workings is restricted to authorization by the Site Manager.

3.3 MINE WASTE MANAGEMENT FACILITIES

3.3.1 MINE WASTE ROCK DUMPS AND ORE PILES

All mine waste rock dumps are physically stable. There are currently no issues associated with the dumps and piles, and none anticipated for the duration of C&M.

3.3.2 TAILINGS CONTAINMENT AREAS

The five (5) tailings containment areas (TCA) are actively being surveilled and maintained in accordance with the *TSF OMS Manual* and inspected pursuant to the water licence.

3.4 FUEL STORAGE & HANDLING

C&M activities surrounding fuel storage and handling are outlined in the *Spill Response Plan*.

3.5 POWER GENERATION

Powerhouse generators 602 and 605 are maintained and currently provide sufficient power to support C&M activities. Smaller generators (ranging from 50kW to 500kW) may be utilized to power the operational infrastructure at the site during C&M, in place of the powerhouse generators.

3.6 SITE STRUCTURES

- Routine inspection of site structures is carried out and, if necessary, corrective actions are implemented to ensure that risks to the environment, health and safety do not occur. Demolition of such structures has occurred intermittently in the past, as described below, and will continue as part of on-going risk reduction efforts.

3.6.1 HISTORIC DEMOLITION ACTIVITIES

NATC began the process of building removal in 1991 with the removal of the trailer court. In 1992 seven houses, several sheds and additional wooden buildings were demolished or sold and removed from the site, and the foundations were broken up or filled and buried.

In 2007, demolition of the curling/skating rink started, and was complete in 2008.

In 2008, three (3) duplexes, an old school, and the old propane tank farm adjacent to Sardine Creek was demolished and reclaimed.

In 2009, the dance hall, outhouses, and the baseball diamonds located in the vicinity of the hot springs, were demolished and reclaimed. Also in 2009, the ski hill towers and a satellite dish were removed and the area reclaimed, and the fuel tank to the south of the townhouses was removed.

In 2011, a building at the former rifle range was demolished and the area reclaimed.

In 2021, the old tank farm by the mill that was previously withdrawn from service was demolished, the metal recycled and the area reclaimed.

3.7 ROADS

Overland access to the mine site is via 310 km of public all-weather gravel roads from Watson Lake, Yukon (YK), with the last 14 km of this public road in the NT. The YK Government maintains the majority of the access roads, with NATC historically maintaining the last 59 km of the mine access road. The access roads continue to be maintained, as necessary, during C&M, including grading of the gravel surface, snow clearing, clearing blocked culverts, and general repairs to the road surface and culverts.

NATC continues to maintain 20 km of private mine roads to the extent necessary for monitoring and C&M of the Mine. Public access to the Mine is actively surveilled and limited when the Mine is occupied by NATC. When the Mine is not occupied public use of the private Mine roads is deterred with signage, limited by installing barriers and surveilled with remote cameras. The gate to the Mine will remain locked during the C&M period to prevent unauthorized access to the site.

3.8 LANDFILL AND SITE GARBAGE

Waste is managed in accordance with *Waste Management Plan*, and includes continued use of waste management infrastructure during C&M including the landfill and incinerator. Further information can be found in the *Landfill Management Plan* and the *Waste Management Plan*.

3.9 AIRSTRIP

The airstrip continues to be maintained as required during C&M to support crew change, resupply and emergency response. The airstrip use continues to be restricted to company business and authorized visitors only.

3.10 FRESHWATER SUPPLY SYSTEM

The fresh water pumping and distribution system consists of a 15 HP Tsurumi pump with a 2" poly pipeline run up to the operational buildings. There is a second pump located in the pumphouse as a backup unit. Alternative pumps and distribution system may be used throughout C&M as needed.

A flowmeter is installed on the line to record the volume of water used and it is reported in the monthly Surveillance Network Program (SNP) reports.

A doghouse structure has been constructed around the pump and chlorine injection system to reduce the heating requirements to support the operation of the system.

Freshwater use is discussed further in the *Water Management Plan*.

3.11 SEWAGE TREATMENT PLANT

The sewage treatment plant remains in service during C&M, with continued treated effluent discharge to TCA 4. The existing flowmeter on the discharge line continues to be monitored and volumes are reported in the monthly SNP reports.

The sewage treatment plant is discussed further in the *Waste Management Plan* and the *Water Management Plan*.

3.12 MODULAR CAMP

A modular camp and associated infrastructure may be installed during C&M to replace existing facilities, for operational efficiency and ease of use during periods of intermittent occupation. Should that camp be installed, this Plan will be revised accordingly and submitted to the Mackenzie Valley Land and Water Board (MVLWB) for review and approval.

4.0 CARE & MAINTENANCE ACTIVITIES

The focus of C&M activities is to fulfill compliance obligations and maintain the Mine site in a safe and secure manner until the commencement of permanent closure. Accordingly, typical C&M activities include:

- Conducting regular Mine site inspections (see checklist in Appendix A);
- Fulfilling requirements under the SNP;
- Conducting maintenance and surveillance of the TCAs (as outlined in the *TSF OMS Manual*);
- Maintaining on-site roads, the airstrip and the NRR to the extent required to support C&M activities;
- Maintaining equipment and facilities to the extent required to support C&M activities; and
- Reviewing and updating relevant management plans as required and submitting for approval.

The Mine site is occupied continuously for the duration of freshet at a minimum and may be otherwise accessed quarterly. When there are changes in site occupancy from continuous to intermittent, notifications are provided pursuant to the water licence.

Mine site inspections are carried out monthly when the Mine site is continuously occupied, and otherwise quarterly, or as directed by the Inspector.

NATC may also continue to undertake risk reduction activities during C&M including, but not limited to:

- Demolition of retired infrastructure and site components;
- Earthmoving activities such as regrading, stockpiling and staging in areas that are no longer in use and where public access needs to be impeded during intermittent site access;
- Demobilizing items from site that are no longer useful to NATC and are saleable or otherwise useful offsite; and
- Hazardous waste abatement and removal in general, and specifically in the historic townsite.

Concurrent with C&M, NATC is continuing permanent closure planning. It is possible that additional studies requiring collection of data and information at the Mine may be required to support closure planning. Any work undertaken on site will be overseen by the Site Manager and may be supported by the C&M crew.

5.0 REPORTING

Internal and external reporting is required throughout C&M and is carried out by the Site Manager or designate. Reporting includes, at a minimum, the following:

- Internal
 - Daily reports when on site, issued to the NATC Project Management team (i.e. A&M and CIRNAC); and
 - TCA monitoring results issued to the Engineer of Record upon completion.
- External
 - Monthly work hours and accident summary to WSCC;
 - Monthly SNP reports to the MVLWB and the Inspector;
 - Annual water licence report to the MVLWB and the Inspector; and
 - Other, as required pursuant to the water licence.

6.0 REFERENCES

Companies' Creditors Arrangement Act. R.S.C., 1985, c. C-36.

Government of Canada, Government of the Northwest Territories, Inuvialuit Regional Corporation, Northwest Territories Métis Nation, Sahtu Secretariat Incorporated, Gwich'in Tribal Council,

Mackenzie Valley Resource Management Act. S.C. 1998, c. 25.

Mackenzie Valley Federal Areas Waters Regulations (SOR/93-303).

Mine Health and Safety Act, SNWT 1994, c 25.

Mine Health and Safety Regulations, NWT Reg 125-95

APPENDIX A

APPENDIX A C&M CHECKLIST

Care and Maintenance Inspection Form and Checklist		
Check ³	Area, Item	Comment/Rationale/Action
A	Tailings Containment Area	
1	Refer to TSF OMS Manual	
B	Mine	
1	Check entrances, ensure they are secure	
C	Active Surface Facilities	
1	Site security	
a	Ensure buildings are secured	
b	Air strip, no unauthorized personnel	
2	Freshwater	
a	Check pump, barrel, lines, screens, water elevation and heaters	
b	Check & record the Flow Totalizer, Flow Rate and Line Pressure	
c	Check Chlorine Tank, Dilution, Pump and Discharge into sump	
d	Adjust the Chlorine Pump speed based on the Chlorine analysis above, and record in Log Book (bump pump once daily to clean line of precipitate)	
e	Check fresh water bleeds and continual flows	
f	Admin - Chlorine concentration in Potable Fresh Water system (Range = 0.2 - 0.8 mg/L Free Chlorine)	
g	Periodic Maintenance: pull screens & check for blockage	
3	Sewage Treatment Plant	
a	In Lift Pump house, check Pumps, Heater, Tank level, Volume Totalizer, Pipeline Drain valve (1/4 turn open in winter).	
b	Check Flow into the STP mixer/aerator, and clean out coarse trap as required.	
c	Check air temperature inside the building (> 10 C) and settling tank water (> 5 C).	
d	Check Blower and lines, switching to alternate between 1 & 2 each week.	
e	Check coarse trap on discharge of Settling Tank, dumping coarse material back into the settling tank.	
f	Check Air Compressor for the Settling Tank, and weekly move the hose & air lance to a different corner of the tank.	
g	Check heat is on in green lift station by TP4	
h	Monthly Maintenance: Blowers & lift Pumps - 2 shots grease each	
i	Record flow meter reading	
6	Waste	
a	Ensure garbage is stored securely	
b	Hazardous waste storage is secure, no spills, accessible	
c	ID waste oil for heating as required	
7	Fuel/Power	
a	Powerhouse/Generators - general, fuel piping	
b	All fuel storage, handling, dispensing areas, tanks, berms	
c	Generator radiator supply and return temperatures, piping, valves, leaks	
d	Fuel Tank Inspections See Spill Response Plan	
8	Other	
a	Surface Shop piping and heating	
b	Check Admin and Accommodation's building water system and general building conditions	
c	Check site building, tanks and facilities for any unusual items	
D	Inactive Surface Buildings & Facilities	
1	Mill checks	
a	Check for water & ice build-up, ensure all doors are secured	
b	Make sure all doors are kept secure	
2	Other	
a	Mine Vent Fan Area (while accessible) - Ensure intake covers secure (x2)	
b	Mine Dry Complex	
c	80 person facility - Focus on top floor (leaks), 3 lobby areas and basement areas	
d	Kitchen Facility	
e	Apartment A and C	
E	Landfill	
1	Burn Bin area tidy, record waste volumes	

³ Y= checked, everything OK A=checked, action required NA: Not applicable

	2	Erosion control locations	
	3	Surface water routes (freshet)	
F	Water Management		
	1	Station 5-2	
	a	Inspect S5-2 polishing pond water flow inlet and outlet	
	b	Observe containment within pond	
	c	Ensure water is flowing	
	2	Station 4-12	
	a	Inspect behind Mill and check Mine water flow	
	b	Observe containment within diversion ditch	
	c	Ensure water is flowing	
	3	Station 4-13	
	a	Inspect mine portal discharge	
	b	Observe containment within diversion ditch	
	c	Ensure sample point and flow measurement area is free of ice	
	4	Other	
	a	Surface water routes (freshet)	
	b	Erosion control locations	
G	Compliance Program		
	1	SNP signage visible and intact	
	2	Weather station intact and functioning	
	3	Datalogger (level, baro, other) in place and direct read cable undisturbed	
	4	Staff gauges in place, visible and intact	
H	Other		
	1	Fire Extinguisher Checks	
	2	Crane Inspections	
	3	Site roads	
	4	Bridges	
	5	Beaver activity	
I	Data Checks		
	1	Download hydrology data	
	2	Collection and shipping of SNP WQ samples	
	3	SI data collected and sent to EOR	
	4	Weather station maintenance	
	5	VW data collected and sent to EOR	
	6	Weather station downloads	

Action required detail

Check ID	Issue/action

Follow-up on outstanding actions

Check ID	Action date	Status