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April 13, 2026

Mr Eric Dahlgren
Bureau Chief, Hardrock Mining Bureau
Air, Energy & Mining Division
Montana Department of Environmental Quality
1520 East Sixth Avenue
P.O. Box 200901
Helena, MT 59620-0901

Re: Public Comment on Draft Environmental Assessment – Exploration License No. 00816, Amendment 2 (Columbia Gold Project)

Dear Mr Dahlgren,

Great Plains Mining, LLC ('GPM') respectfully submits this letter and the accompanying technical reports and analysis as our formal public comment on the Draft Environmental Assessment ('Draft EA') for Amendment No. 2 ('AMD2') of Exploration License No. 00816, dated March 20, 2026. This submission is made within the public comment period closing April 13, 2026.

GPM greatly appreciates DEQ's work on the EA, and provides these comments in support of DEQ's findings that there will be no significant impacts as a result of DEQ issuing the Exploration License. As you know, GPM held an open house for the public in Lincoln, MT to discuss this License, in which DEQ participated. We have also reached out to stakeholders and had additional conversations about the project. These comments provide additional information that supplements GPM's application, in part as a response to what we heard during that continuing public outreach. GPM is committed to transparency and environmental stewardship and wishes to provide this additional evidence to both DEQ and the Public that this project will benefit the local community with no adverse environmental impacts.

Attached is a spreadsheet that outlines our comments by EA section, along with references to the supporting documentation provided. In addition to the spreadsheet, below is an overview of our comments.

01. Geology and Soil Quality, Stability, and Moisture

The geology and soil in the area of the proposed project ensure that the project will have no adverse or significant impacts.

GPM will implement a range of erosion and sediment control measures to prevent the migration of sediment off-site. Access tracks will be constructed and maintained to minimize disturbance, with water bars or similar features installed where required to divert runoff and reduce erosion potential. Drill pads will be kept to the minimum practicable size. As explained further below, the characterization of widespread groundwater interception across the 21-hole drilling program is incorrect; groundwater will not be adversely affected.

02. Water Quality, Quantity, and Distribution

DEQ is correct that there will be no adverse or significant impacts to ground or surface water as a result of the exploration. The attached hydrologic risk assessment from GPM and the independent analysis done by Hydrometrics confirm that groundwater interception will not occur across the 21-hole drilling program, but rather is possible in only one hole. And that single hole is subject to enhanced engineering controls that, along with the geography of the area, mean the aquifer will not be impacted. The attached stormwater assessment explains that there will be no impacts to surface water, but GPM has sought a SWPPP out of an abundance of caution, nonetheless.

GPM requests that the Department include the referenced potentiometric surface on a figure in the draft EA.

GPM requests the Department recognize that the geology and highly variable water levels in wells indicate that the aquifer(s) in the vicinity of the Columbia Project may be a compartmentalized flow system, that would limit the potential for impacts to beneficial uses even further than analysed in the Draft EA.

GPM requests the Department revise the Draft EA to correct the discussion of the water right as follows:

- Revise the Draft EA to note that the water source is from a private well not a domestic well.
- Revised the Draft EA to correct the maximum flow rate for the water right equal to 99 gallons per minute.
- Correct the Draft EA to note that the use of the well is commercial, not domestic or industrial.
- Add a discussion that the place of use for the well is the point of sale.

Revise the discussion in the Draft EA indicating that there is no proposed increase in use for the well beyond what is allowed in the Ground Water Certificate.

03. Air Quality

DEQ Air Quality Bureau has determined the proposed exploration project does not require a MAQP prior to construction and operation of the affected equipment.

04. Vegetation Cover, Quantity, and Quality

GPM Environmental Management Plan addresses species of risk and weed management that meet or exceed legal requirements.

05. Terrestrial, Avian, and Aquatic Life and Habitats

There will be no significant impacts to fisheries because of the proposed action: the program involves zero interaction with any surface water, zero discharge, non-toxic drilling fluids, and drill sites located on dry ridgetops over 1,350 feet from the nearest stream and approximately 2 miles from the N Fork Blackfoot River.

This proposed exploration program presents zero discharge to, and zero physical contact with any stream, creek, river, or salmonid-bearing water body. There is no credible pathway for any deleterious effects to bull trout, westslope cutthroat trout or any other aquatic species.

06. Unique, Endangered, Fragile, or Limited Environmental Resources

The proposed exploration program presents very low risk to all wildlife species, for the following reasons:

- The total new disturbance is 1.53 acres (0.36% of the 430-acre claim block)—95% of activities occur on previously disturbed trails and pads.
- The drilling campaign is limited to 6-8 weeks in May, with concurrent reclamation restoring each pad within days of drilling completion.
- The habitat within the claim block is common throughout the larger Northern Continental Divide Ecosystem (NCDE). Any temporarily displaced animal can find identical habitat in the surrounding Helena-Lewis and Clark National Forest and return after the program concludes.

07. GPM's Environmental Management Plan (SM-EMP-COL-001, Rev 1), which GPM has voluntarily created and agreed to, includes comprehensive wildlife protocols: bear-resistant waste storage, pre-clearing migratory bird nesting surveys, dawn/dusk safety protocols, species-at-risk reporting, and downward-facing warm-spectrum lighting. Historical and Archaeological Sites

The proposed drill pad locations have been designed to avoid cultural features; however GPM has committed to a robust Unanticipated Discovery Protocol, requiring immediate cessation of work within a 100-foot radius of any discovery, notification of DEQ and SHPO within 24 hours, and no resumption of work until written authorisation is received.

Extensive cultural resource inventories have been done in the past. GPM has contracted for an updated cultural resource inventory.

08. Aesthetics

The proposed exploration program will have very low, non-significant visual and aesthetic impact, for the following reasons:

- The project area is not visible from Montana Highway 200. The drill sites are at elevations of 5,756–6,411 ft amsl, approximately 8 miles east of Lincoln, screened by multiple intervening ridgelines and miles of dense conifer forest. No line of sight exists between the highway and any drill pad.
- The drill rig (Boart Longyear LF90) is a compact, track-mounted unit with a mast height of approximately 20 feet—smaller than most trees in the project area. It will be partially or fully screened by surrounding forest at all pad locations.
- All surface disturbance (1.53 acres) will be fully reclaimed within two years, and probably sooner, returning the visual landscape to its pre-disturbance condition. No permanent structures, infrastructure, or landscape alteration will remain.
- Lighting during night shift will be restricted to 8:00 PM–6:00 AM only, using fully shielded, downward-facing, warm-spectrum (2700K) light plants with no upward light spill.
- Fugitive dust from vehicle traffic is controlled by a 15-mph speed limit on all unpaved roads, with water application during dry conditions (EMP Section 7). Trinity Consultants' quantitative analysis confirms total PM10 of 0.29 tons/year—negligible and not visible beyond the immediate work area.

09. Demands on Environmental Resources of Land, Water, Air, or Energy

GPM Environmental Management Plan reduces minimal impacts to insignificant at a minimum.

10. Impacts on Other Environmental Resources

GPM submits that the EA is the correct and legally sufficient level of environmental review. This comment should be read alongside GPM's companion submission, *EA Sufficiency and EIS Non-Requirement Report* (SM-EAEIS-COL-007), which addresses the broader legal framework governing the EA/EIS determination, including the applicable standard of review and the binding authority of *Park County Environmental Council v. DEQ and Lucky Minerals, Inc.*, DA 19-0492 (Mont. 2020).

11. Human Health and Safety

GPM Environmental Management Plan includes dust management plan. A comprehensive risk assessment has been completed for dust and a dust database has been completed by independent consultants.

13. Quantity and Distribution of Employment

For a community with a median household income of \$45,912 (Data USA, 2023), a declining population (–17.9% since 2020), and an economy dominated by seasonal

accommodation and food services, the injection of exploration spending during the shoulder season (May–June) represents a meaningful and welcome economic stimulus. With the 6–8-week campaign duration, total direct local expenditure is estimated at \$171,000–\$259,000, with a total economic impact (including multiplier effects) of \$256,500–\$518,000.

14. Local and State Tax Base and Tax Revenues

For a community with a median household income of \$45,912 (Data USA, 2023), a declining population (–17.9% since 2020), and an economy dominated by seasonal accommodation and food services, the injection of exploration spending during the shoulder season (May–June) represents a meaningful and welcome economic stimulus. With the 6–8-week campaign duration, total direct local expenditure is estimated at \$171,000–\$259,000, with a total economic impact (including multiplier effects) of \$256,500–\$518,000.

15. Demand for Government Services

GPM's EMP includes a traffic management plan to address impacts that could result from increased vehicle traffic on local roadways.

16. Locally Adopted Environmental Plans and Goals

The project area is subject to any plans or rules set forth by Federal, State or local government. GPM EMP addresses weed management. GPM is also cooperating with the Lewis and Clark County Weed District.

23. Greenhouse Gas Analysis

Independent, third-party assessments confirm that the proposed exploration program generates de minimis emissions that fall far below any regulatory threshold of significance:

- Total GHG emissions: 276.6 tons CO₂e for the entire project lifecycle—equivalent to approximately 55 passenger cars driving for one year, or roughly 30 average U.S. households' annual energy consumption.
- Total PM₁₀ emissions: 0.29 tons/year—well below the 100 tons/year minor source threshold under ARM 17.8.
- Total PM_{2.5} emissions: 0.019 tons/year—negligible and indistinguishable from background particulate levels.

These emissions do not represent a material impact on air quality, climate, or public health, and do not approach any threshold that would trigger additional regulatory review.

GPM draws the DEQ's attention to the fact that this submission includes multiple independent third-party expert verification of the key technical conclusions underpinning the Draft EA. The hydrogeological analysis has been independently reviewed by Hydrometrics, Inc. (Greg Bryce, P.G., Technical Memorandum dated April 10, 2026), who confirms that the compartmentalised fracture flow geology precludes any hydraulic connection between proposed drill holes and the

alluvial aquifer system that supports stream baseflows in the Blackfoot watershed. Separately, the GHG and fugitive dust emissions have been independently quantified by Trinity Consultants (Lauren Carr, P.E., Emissions Workbooks dated April 10, 2026), a nationally recognised air quality consultancy, using EPA-approved emission factors from 40 CFR Part 98, AP-42, and eGRID.

These independent expert analyses ensure that the EA's conclusions are not reliant solely on applicant-supplied data. They have been independently verified and technically validated by qualified third-party professionals, providing the DEQ with the evidentiary foundation to further support the adequacy and rigor of the environmental assessment. In light of recent Montana case law emphasising the importance of independent field verification of EA data (cf. *Protect the Clearwater v. DEQ*, DA 23-0548, 2024), GPM considers this third-party validation to be a critical component of a litigation-proof record.

In all of the above points, GPM supports the DEQ's determination, as stated on page 43 of the Draft EA, that:

'Based on consideration of the criteria set forth in ARM 17.4.608, and the analysis presented in this EA, DEQ has determined that the proposed action, Amendment 2 to Exploration License No. 00816, is not expected to significantly impact the quality of Montana's environment. Preparation of an EA is therefore the appropriate level of environmental review under MEPA, and an EIS is not required for this action.'

The proposed action—21 diamond core drill holes disturbing 1.53 acres of previously impacted private land for a period of 6-8 weeks—is precisely the type of project for which the Montana Legislature created the Exploration License under § 82-4-332, MCA. The Draft EA itself confirms (p. 5): “The exploration license would not authorize mining. Any future proposal for mining would require a separate application, review, and permitting decision, and is not analysed in this EA.”

As explained in the attached comments on the sufficiency of the EA review, and the cumulative impacts analysis, GPM agrees with DEQ that an EIS is not necessary and there are no significant cumulative impacts. The Montana Supreme Court has been clear that exploration and mining are legally and operationally distinct activities and that the DEQ is not required to assess hypothetical mine impacts when reviewing an exploration license. Under MEPA, related future actions may only be considered when these actions are under concurrent consideration by any agency through pre-impact statement studies, separate impact statement evaluation, or permit processing procedures, which is not the case here. § 75-1-208(11), MCA; ARM 17.4.608(4)(b)). The historical disturbance at the site has been substantially reclaimed, with the bond released by DEQ in September 2022 and the corresponding SWPPP terminated in November 2022. No mine is proposed, planned, or under concurrent consideration by any agency.

GPM respectfully requests that the DEQ approve Amendment 2 to Exploration License No. 00816, subject to the conditions identified in the Draft EA and the commitments made in GPM's Environmental Management Plan (SM-EMP-COL-001, Rev 1), and issue the final Record of

Decision on the Environmental Assessment consistent with the impact determinations recognized in the Draft EA.

GPM appreciates the professionalism and rigour with which the DEQ's Hardrock Mining Bureau has conducted this environmental review. We look forward to a final decision that allows this responsible, low-impact exploration program to proceed.

Respectfully submitted,



[Authorised Signatory and MD/CEO]

Great Plains Mining, LLC

On behalf of Sentinel Metals Limited (ASX: SNM)
