

April 19, 2021

Mr. Marc Croteau,
Deputy Minister

Ministère de l'Environnement et de la
Lutte contre les changements climatiques,
Direction de l'évaluation environnementale des projets miniers
et nordiques et de l'évaluation environnementale stratégique
Marie-Guyart Building, 6th floor, box 83
675, Rene-Levesque Boulevard East,
Quebec (Quebec) G1R 5V7

Subject: Responses to questions and comments dated February 15, 2021 concerning the request

for a certificate of non-compliance with site development and excavation of an

exploration ramp (Gladiator project)

Votre Réf.: 3214-14-065

Dear Sir,

This document gathers the answers to your questions and comments concerning the above-mentioned project.

QC-1. - The wetland inventory work carried out to complete the request for exemption does not meet the requirements of section 46.0.3 of the Environment Quality Act (EQA) for an authorization request made in under section 22 of the EQA. For example, no inventory plots have been completed within the planned footprint of the waste rock, organics and overburden stockpile or the polishing pond. Thus, a characterization of the sector meeting the requirements of the EQA will be required by the Ministry of the Environment and the Fight against Climate Change at the time of the authorization request filed under section 22. In addition, it is suggested that the promoter solicit the participation of land users in order to participate in the characterization work.

Depending on the results, the ministry may ask to review the positioning of certain infrastructures. In the event that changes must be made to the location of the infrastructure after the issuance of the certificate of exemption of the project, the promoter will have to submit a new request of exemption.

Bonterra has assigned GCM firm to perform a characterization of the sector to meet the requirements of the EQA. As mentioned in your question, we will be able to provide everything at the time of the authorization request filed under section 22. In addition, we will ask Mr. Marshall Icebound, tallyman, to participate in the characterization work.

QC – 2. - The promoter must commit to set up, from the start of the development work, an active treatment plant for mine water that would treat suspended solids (SS), metals and ammoniacal nitrogen.

Bonterra is committed to setting up, from the start of development work, an active mine water treatment plant that would treat suspended solids (SS), metals and ammoniacal nitrogen. In



addition, Bonterra is committed to using only emulsion explosives for exploration ramp development, in order to minimize ammonia nitrogen production.

QC – 3. - COMEV has been informed that a meeting will be held on February 10, 2021 between the promoter and the tallyman affected by the project. In this regard, the promoter must specify the nature of the discussions and the concerns expressed during this meeting and whether, following the discussions, adjustments must be made to the project.

During the meeting held on February 10, 2021 between the promoter and the tallyman affected by the project, we discussed our drilling program on Coliseum North targets, which are located near Mr. Icebound's camp. We consulted with the Cree Nation Government who had no objection with our drilling proposal, but since it is near Mr. Icebound's camp, they asked us to have his consent.

Mr. Marshall Icebound and Ms. Judy Trapper had a conversation with Mr. Boris Artinian, chief geologist of Bonterra at Gladiator. They discussed the Coliseum North drilling program near their camp, and they expressed the following reservations: noise during the night shift. To respond to this item, Bonterra is committed to minimizing noise during the night shift and if this is still not satisfactory for Mr. Icebound and Ms. Trapper, the company is committed to modulating shift hours work according to a schedule provided by Ms. Trapper and eventually cease operating during the night shift if the problem persists.

As compensation, and according to the agreement reached, Bonterra will open an old trail that gives access to the north of the lake surrounding their camp and we will also open an access to the water (for drilling needs) that Mr. Icebound and Ms. Trapper will be able to use in the future.

Hoping that everything meets your expectations, please accept my most sincere gratitude.

Pascal Hamelin, ing. President and CEO

Bonterra resources Inc.