



David N. Germain
416-868-3162
dgermain@trlaw.com

SENT BY EMAIL ONLY

June 23, 2026

Mr. Ajay Persaud
Environmental Scientist
Permit to Take Water Unit, Environmental Permissions Branch
Ministry of the Environment, Conservation and Parks
135 St Clair Ave W
Toronto, ON
M4V 1P5

Dear Mr. Persaud:

**Township of Melancthon re Permit to Take Water amendment application
(ERO 025-1082)
Our File No. 501050**

We are the solicitors for the Township of Melancthon ("Township"). We are writing to provide additional comments on the Strada Aggregates Inc. Permit to Take Water ("PTTW") amendment application (ERO 025-1082). These comments should be read in conjunction with those provided by Mr. Lemieux by email on October 31, 2025, as well as the attached letters from Bluewater Geoscience Consultants Inc. ("Bluewater") and Hydrogeology Consulting Services Inc. ("HCS")

Non-Compliance with Current PTTW

As noted in the attached letter from Bluewater, a review of Strada's latest annual compliance report, dated March 25, 2026 demonstrates an apparent lack of compliance with the requirements of the current PTTW. In particular, it appears that a number of the monitoring locations specified in s. 4.2 of the PTTW have been decommissioned, damaged or destroyed and are not being monitored. These locations are OW2 (A, B and C), OW8B, OW11 (A and C) and both the north and south ponds. It is not clear how long this situation has existed.

Thomson Rogers LLP

390 Bay St., Suite 3100, Toronto, ON M5H 1W2 | TF: 1-888-223-0448 | T: 416-868-3100 | F: 416-868-3134

trlaw.com



While the Township acknowledges that s. 4.3 of the PTTW does contemplate recommendations on modifications to the monitoring program set out in the PTTW, we are not aware of the Ministry approving any such modifications.

Loss of approximately 1/3 of the monitoring locations specified in the PPTW has the potential to degrade the quality of the already limited monitoring program and create the potential for information gaps. Moreover, the Township is concerned that the specific requirements of the PTTW have not been adhered to and that changes have been made to the monitoring program without any apparent approval from Ministry staff. In the Township's view, this situation should be addressed and communicated to the Township and residents before any amendment to the PTTW is approved.

Lack of Justification for the Proposed PTTW Amendment

The proposed amendment would more than double the permitted daily water taking volume. No rationale has been provided for this increase other than a vague statement that it is intended to support an increase in aggregate production. There is no indication that the rate of water taking in the current PTTW is insufficient to accommodate the maximum rate of aggregate extraction permitted under Strada's current ARA site plans. So far as the Township is aware, the only proposal to amend those site plans entails a proposal for below water table extraction that is currently being processed by the MNRF. In the Township's view, the proposed increase in water taking should be evaluated together with the proposed below water table extraction. If the proposed PTTW amendment is granted, it should be specified that it is only valid in conjunction with above water table aggregate extraction.

Technical Issues Raised by HCS

The attached letter from HCS raises a number of technical issues, including apparent gaps in the data presented in support of the proposed PTTW amendment, as well as inconsistencies between the hydrogeology reports provided in support of the PPTW amendment and those provided in support of the proposal for below water table expansion. These issues should be comprehensively addressed prior to any PTTW amendment being granted.

Furthermore, in the context of the application for below water table extraction, the Township's natural heritage and surface water peer reviewers have raised a number of deficiencies in the characterization of the natural heritage system which has the potential to be impacted by water taking at the Strada site. These deficiencies have been communicated to the applicant. A proper assessment of potential impacts cannot be undertaken until these



deficiencies in the characterization of the natural heritage system have been addressed. Again, the Township believes that the proposed PTTW is premature until these issues have been resolved.

Finally, believe that the issues raised in this letter would benefit from discussion. The Township therefore requests an opportunity for its representatives and consultants to meet with you to discuss this matter.

Yours very truly,

David N. Germain
David N. Germain Law Professional Corporation

DNG/dng

Cc: Township Staff
David Donnelly, Donnelly Law



25 Water Street West
Elora ON
N0B 1S0
www.hydrog.ca

June 17, 2026

Corporation of the Township of Melancthon
157101 Highway 10
Melancthon, ON
L9V 2E6

Re: Peer Review of 2026 Hydrogeological Assessment Report – REVISION 1
Strada Aggregates Inc.
Shelburne Pit/Quarry
437159 4th Line
Shelburne, Ontario

BACKGROUND

This peer review has been conducted at the request of the Corporation of the Township of Melancthon. The 2026 Report being reviewed, entitled "Strada Shelburne Hydrogeological Assessment" was prepared for Strada Aggregates Inc. by Alicia Kimberley and Alyssa Flaherty of Tatham Engineering Limited on February 26, 2026.

PLEASE NOTE: The February 26, 2026 Hydrogeological Assessment report represents an update to the July 30, 2025 report of the same name. As a result, this peer review considers the February 26, 2026 Report in the context of an update and response to our October 24, 2025 peer review of the July 30, 2025 report. This peer review should be read in conjunction with our October 24, 2025 peer review.

This peer review was completed in accordance with the Professional Geoscientists Ontario (PGO) Professional Geoscientists Reviewing Work Prepared by Another Professional Geoscientist guideline document (2024).

The purpose of this peer review is an unbiased and independent Technical Review of the geoscience content presented in the hydrogeological assessment report.



The intent of the review is to assess:

- Whether the objectives set out for the work were reasonable;
- Whether the completed work has met the objectives;
- The validity of any assumptions, conclusions, and/or calculations made in the 2026 Report;
- The validity of any recommendations made and their appropriateness to the project objectives; and,
- Whether there were other options that should have been considered in the 2026 Report.

Chris F Helmer of Hydrogeology Consulting Services Inc. (HCS) is a licensed and practicing geoscientist under the Professional Geoscientists of Ontario specializing in the field of hydrogeology. With more than 23 years of career experience in the field of hydrogeology, Mr. Helmer has worked on numerous hydrogeological investigations throughout Southern Ontario.

Chris F Helmer and HCS have no direct or potential conflict of interest with the Corporation of the Township of Melancthon, with Strada Aggregates Inc., with Tatham Engineering Limited, or with the authors of the 2026 Report.

TECHNICAL REVIEW OF REPORT

The Tatham Engineering Limited 2026 Hydrogeological Assessment Report (the 2026 Report) describes the location and physical setting of the subject property (the Site), and identifies the current licensing for the quarry. The 2026 Report notes the three properties comprising the Site are integrated, including an existing closed loop washing facility supported by an existing Permit to Take Water (PTTW). The descriptions are unchanged from the 2025 Report.

The purpose of the investigation is described as supporting a PTTW for extraction of groundwater and surface water from an unlined closed-loop wash pond system that includes a re-circulation process that treats and re-uses process water with on-site infiltration and no off-site discharge. The purposes are unchanged from the 2025 Report.

The scope of work is described as establishing local and regional geology and hydrogeology; assessing impacts to drinking water wells; and, preparation of a hydrogeological assessment report through completion of desktop review of available resources. The scope of work is unchanged from the 2025 Report.

The 2026 Report continues to reference previously completed annual compliance monitoring reports from 2019-2024, with the 2023 and 2024 monitoring data continuing to be relied upon for the 2026 Report. There does not appear to be any reference to monitoring data from 2025.

The 2026 Report notes the existing PTTW was issued in 2017, authorizing takings of up to 2,400,000 L/day over a maximum 10 hour period at rates of up to 4,000 L/min, for up to 230 days per year.

Water taking reports submitted to the MECP between 2017 and 2024 were reviewed, and the 2026 Report correctly notes apart from one day (October 17, 2017) during this period all water takings were below permitted volumes.

It is noted; however, the water taking records include many days with no data recorded. Additionally, the water taking records do not indicate durations of the takings or maximum water taking rates. Mathematical calculations indicate on a number of days a 4,000 L/min rate would need to be maintained for 10 hours continuously to withdraw the 2,399,690 L/day reported volume.

The 2026 Report notes in 2023 and 2024 water taking occurred for several days past the November 16 PTTW permitted window. The 2026 Report also notes in both years to total number of days of takings were significantly lower than the permitted number of days of takings.

Additionally, as noted by Bluewater Geoscience Consultants Inc. in their review of the "Strada Shelburne, Annual Compliance Report" dated March 25, 2026, it appears that several of the monitoring locations required to be monitored pursuant to section 4.2 of the current PTTW are longer be available to fulfil the requirements of the PTTW. It is noted the 2026 Report does not address the absence of these monitoring locations from the monitoring program.

SECTION 2

Section 2 of the 2026 Report (**Site Setting**) summarizes the findings of the operational plans for the pit/quarry, noting there is no off-site discharge of surface water with stormwater evaporating or infiltrating through the pit floor; fuel is stored in above-ground storage tanks; and maximum predicted groundwater levels range from 498.5-500 mASL to 482.2-489.5 within the three properties that make up the Site. It is unknown whether the missing monitoring locations from the current PTTW monitoring program (and the lack of data from those locations) would influence the maximum predicted groundwater levels.

The 2026 Report continues to indicate excavation below the water table will not occur. However, HCS is aware that Strada Aggregates Inc. has applied for approvals to permit below water table extraction at the Site. HCS previously reviewed the Tatham Engineering Limited Maximum Predicted Water Table Report (January 13, 2025) for the Site, which describes the proposed implementation of groundwater inflow control barriers along the overburden (and bedrock) benches as pit/quarry development progresses during the proposed pit/quarry expansion, along with proposed groundwater (and surface water) capture and infiltration.



The Maximum Predicted Water Table Report describes and illustrates overburden removal to approximate elevations of 490-495 mASL, with overburden groundwater control barriers installed at these elevations. The relationship between the proposed PTTW and the proposed below water table extraction is not discussed in the 2026 Report, and this should be clarified.

The 2026 Report correctly describes the physiographic and geologic setting of the Site based on regional mapping, along with a description of the general topography of the Site. The description is unchanged from the 2025 Report.

The 2026 Report summarizes available MECP water well records, correctly listing sixteen wells identified as domestic/livestock wells and listing six wells identified as commercial/industrial wells. Of the list of fourteen wells with no specified use it is noted four have a diameter of 0.15 m or more, likely indicating they are also supply wells (rather than monitoring wells). Water well record details are generally reasonably summarized; however, it is noted one domestic well (1701316) is completed in overburden at a depth of 15.8 m, and none of the commercial wells identified in the appended list of MECP water well records are completed in overburden (they are all bedrock wells).

The 2026 Report notes a specified well record appears to have been previously decommissioned; however, an abandonment record was not prepared at the time of decommissioning. Review of the well record from the Ministry's VWR database indicates it is (was) within the quarry perimeter fence line. The 2026 Report correctly highlights the importance of following O.Reg. 903's requirements for abandonment of wells

The 2026 Report correctly notes the Site is not located within a municipal Wellhead Protection Area (WHPA) or Intake Protection Zone (IPZ), but does lie within a Significant Groundwater Recharge Area (SGRA) and Highly Vulnerable Aquifer (HVA) area. The 2026 Report reasonably describes the geologic reasoning behind the SGRA and HVA designations.

SECTION 3

Section 3 of the 2026 Report (**Groundwater Monitoring**) summarizes the locations and general construction information for on-site and off-site monitored wells, separating the wells into overburden aquifer wells, overburden aquitard wells, and bedrock wells. The 2026 Report describes continuous water level data collection using dataloggers along with periodic manual measurements.

Section 2 of the 2026 Report is generally unchanged from the 2025 Report. The following text remains from the 2025 Report peer review remains valid.

The 2026 Report describes buried bedrock valley conditions in the southeastern portion of the study area resulting in permanent unsaturated (dry) conditions at OW3A, OW10A, OW14A, OW19A, and OW20A. However, the borehole logs included in the Tatham Engineering Limited Maximum Predicted Water Table report indicate:

- OW3 does not have a well "3A" screened in the sand and gravel aquifer, only a well "3B" screened at the till aquitard/bedrock interface. The borehole log notes the sand and gravel exhibiting dry to wet conditions.
- OW10 does not have a well "10A" screened in the sand and gravel aquifer, only a well (unlabeled) screened in the till aquitard. The borehole log notes the sand and gravel exhibiting dry to wet conditions.
- The borehole log for OW14 notes the sand and gravel exhibiting dry to wet conditions.
- OW19 does not have a well "19A" screened in the sand and gravel aquifer, it is screened in the till aquitard. The borehole log notes the sand and gravel exhibiting dry to wet conditions.
- The borehole log for OW14 notes the sand and gravel exhibiting dry to wet conditions.

Additionally, no manual groundwater measurements for any wells are tabulated in the 2026 Report; and, no discussion of 2025 monitoring data is provided.

The 2026 Report reasonably describes seasonal trends in groundwater levels with peaks observed during spring thaw conditions in April and May (up to 2024).

The appended Figure 6 in the 2026 Report provides the same overburden aquifer groundwater contour map included in the 2025 Report. It is noted the measured groundwater elevation at OW8A and the measured groundwater elevation at OW4A do not seem to correlate with the reported dry condition at OW3A (not shown on the Figure); although this may be the result of the differing stratigraphy of OW3A.

The 2026 Report describes groundwater conditions in the underlying till and the weathered bedrock as exhibiting more muted seasonal trends.

The 2026 Report describes groundwater levels in domestic supply wells completed in the bedrock aquifer as not exhibiting interference from on-going aggregate operations; however, the appended hydrographs for supply wells DW1-DW5 only include two years of data, making assessment of historical trends impractical. Multiple years of data would be required to evaluate whether a trend in water levels is occurring, and 2025 data is not included in the 2026 Report.



Surface water monitoring locations are also summarized, with surface water hydrographs provided. The ground surface elevation of the ponds and wetlands have been added to Table 2 in the 2026 Report.

The 2026 Report describes water levels in the North Pond and South Pond also exhibiting typical seasonal trends, and noted observations are consistent with historical trends observed at the Site. As noted previously, the description provided is unchanged from the 2025 Report.

The 2026 Report states dataloggers in the North and South Ponds were relocated in 2025 to T-bars installed in the Ponds to provide fixed monitoring locations for future monitoring events. The measured surface water elevations have been updated from the 2025 Report, and are assumed to reflect 2025 data (although this is not explicitly stated in the report). Measured surface water elevations in SW1 and SW2 have been updated to reflect a geodetic datum.

The 2026 Report assumes the North Pond and South Pond are perched above the overburden aquifer; however, this may not be consistent with some of the available data. It is noted; however, that the borehole log for OW12 included in the Tatham Engineering Limited Maximum Predicted Water Table report (located in proximity to the locations of the North Pond and South Pond shown in the Hydrogeological Assessment Report) indicates at least 12 m of sand/sand and gravel deposits; and, the borehole log for OW10 included in the Maximum Predicted Water Table report (located in proximity to the locations of the North Pond and South Pond shown in the Hydrogeological Assessment Report) indicates approximately 10 m of sand/sand and gravel deposits bisected by an approximately 3 m thick silty clay layer.

Additionally, HCS previously peer reviewed the EarthFX Incorporated Impact Assessment Report (January, 2025) for the Site and noted the appended North West – South East Cross Section C prepared by EarthFX Incorporated (September 23, 2024) included in the Gemtec (October 4, 2024) Geotechnical Feasibility Study as an addendum to the Impact Assessment Report, which extends through the general area of the North and South Ponds, illustrates vertically extensive sand and gravel deposits where the shallow aquifer is assumed to exist.

Further, the appended Figure 6 in the 2026 Report illustrates shallow groundwater elevations at/above the water levels noted in the North and South Ponds; and, the appended Figure 7 in the 2026 Report illustrates the wash ponds (in relative proximity to the North and South Ponds) as having groundwater elevations of 492+ mASL, and describes the wash ponds as "...constructed into the groundwater table and shallow aquifer...".

In the absence of a cross section illustrating the stratigraphy beneath and surrounding the North and South Ponds it is challenging to conclusively determine whether the assumption of perched conditions above the overburden aquifer is correct.

SECTION 4

Section 4 of the 2026 Report (**Discussion and Analysis**) identifies the required water taking for the proposed aggregate washing facility as 5,000,000 L/day from a closed-loop wash pond system consisting of three settling ponds and one wash/freshwater pond.

The 2026 Report updates the proposed water taking rates and durations, such that they now reflect the proposed maximum volume per day. It is noted the maximum rate (7,000 L/min) and maximum duration (12 hours) would slightly exceed the maximum volume (5,000,000 L); however, the 2026 Report proposes water taking can be limited to the 5,000,000 L/day rate.

It is noted the proposed water taking is slightly more than double the currently permitted taking of 2,400,000 L/day. The reason(s) for the requested increase in the daily water taking volume are not explicitly stated in the 2026 Report, although based on HCS' previous review of the EarthFX Incorporated Impact Assessment Report it is understood significant expansion of the pit/quarry operations is proposed. A "Water taking Needs Attachment" PDF document was previously provided with the 2025 Report, indicating the proposed increase is intended to support an increase in aggregate production; however, this document did not have a reference or other association to the 2025 Report. This document was not included with the 2026 Report that was provided for this peer review. It is noted no rationale is provided to explain why this additional water taking is required to support the rate of extraction permitted in the current ARA site plans. Further, there is no discussion in the 2026 Report regarding a proposal to increase the annual extraction limit in the existing ARA site plans. It is noted the EarthFX Incorporated Impact Assessment Report indicates that a significant expansion of the pit/quarry operations is proposed, including extraction below the water table. The 2026 Report does not include an assessment of the impacts of the proposed PTTW with consideration of the impacts of the proposed below water table extraction.

The 2026 Report describes the wash process water as discharging to the first settling pond, then draining to the second and third ponds in sequence, and finally draining into the freshwater pond. The description is unchanged from the 2025 Report.

The 2026 Report explains groundwater feeds the wash ponds and washing operation, with process water re-circulated through the ponds for re-use. While the 2026 Report reasonably states the majority of supply water is re-circulated back into the wash pond through the settling ponds and not discharged off-site, the consumptive use of groundwater (i.e. the water that leaves the site via wet aggregate and/or evaporation from the ponds) is not specified. As a result, the conclusions outlined in the 2026 Report may not consider all variables.

The 2026 Report reasonably notes (as did the 2025 Report) the wash ponds use groundwater from the shallow overburden aquifer, while identified private water supply wells are using water from the underlying limestone bedrock aquifer (apart from the one overburden supply well noted previously in Section 2 of this peer review report) and as a result would not be expected to be impacted by the expanded aggregate washing operations. As HCS previously peer reviewed the EarthFX Incorporated Impact Assessment report for the proposed quarry expansion, it is understood mitigation measures are proposed to protect bedrock groundwater resources from the proposed bedrock quarrying operations. The proposed PTTW does not appear to have been evaluated in conjunction with the proposed below water table extraction.

The 2026 Report continues to conclude that surface water features SW1 and SW2 and the Boyne River would not be expected to be impacted by the proposed expanded aggregate washing operations. While the large open wash ponds are described as being separated by an earth berm, a detailed description of how runoff of contaminants (e.g. fuel spills from heavy equipment operating near the wash ponds) would be prevented from entering the ponds and thereby potentially contaminating the shallow groundwater aquifer that is anticipated to support the identified provincially significant wetland (PSW) and the Boyne River is not provided.

SUMMARY OF ITEMS TO BE ADDRESSED

The 2026 Report does not differ significantly from the 2025 Report, and does not include new data, analysis, interpretation, conclusions, or recommendations. As a result of the technical peer review, the following items (most originally provided in the peer review of the 2025 Report and still outstanding), are (still) recommended to be addressed by the author(s) of the 2026 Report:

1. Confirmation whether monitoring tasks were completed in 2025. If so, confirmation whether 2025 data supports the observations and conclusions discussed in the 2026 Report; or, whether variations were observed.
2. Clarification whether data gaps in the 2026 reported water taking volumes (as previously reported in the 2025 Report) are non-taking days (i.e. zero water taking), or missing data.
3. Discussion of the significance of missing monitoring locations and data (as noted in the Bluewater Geoscience Consultants Inc. review of the Strada Shelburne, Annual Compliance Report) with respect to the assessments and conclusions included in the 2026 Report.
4. Confirmation whether water taking rate and duration information exists for the pit operations.

5. Assessment of the overburden extraction depths reported in the Maximum Predicted Water Table Report, and the requirement for overburden control barriers, vs. the statement in the Hydrogeological Assessment report that extraction will not take place below the water table, with clarification provided as required.
6. Clarification regarding the well construction details for OW3A, OW10A, OW14A, OW19A, and OW20A with respect to the sand and gravel overburden aquifer, and provision of manual water level measurements from these wells.
7. Assessment of whether the North Pond and South Pond are in fact perched above the overburden aquifer (vs. connected to it) based on all available data; and, if connected whether they could be impacted by the proposed water taking and aggregate washing operations.
8. Confirmation of the reason(s) for the proposed increase in the daily water taking volume.
9. Evaluation of the relationship between the proposed PTTW and the proposed below water table extraction.
10. Confirmation of the quantity of the total proposed daily water taking volume that will be consumptive (i.e. lost via off-site hauling of wet aggregate, evaporation, etc.); and, whether the consumptive loss has the potential to impact shallow groundwater resources and the surface water features which depend on those resources.
11. Confirmation how runoff of contaminants into the wash ponds will be prevented/mitigated to minimize the potential for impacts to shallow groundwater resources and the surface water features which depend on those resources.

CLOSURE

The 2026 Hydrogeological Assessment Report generally provides a reasonable overview of the proposed water taking, and reasonably notes the majority of the proposed water taking is recycled back to the shallow groundwater aquifer through the settling pond process. It is important to note the 2026 Report does not differ significantly from the 2025 Report.

The described and implemented scope of work generally provides a satisfactory methodology to accomplish the goal of the 2026 Report; however, the Summary of Items to be Addressed above identifies areas where additional information is required to adequately support the overall assessment of the potential for impact from the proposed increase in water taking and washing operations.

The comments provided in this peer review and the recommended Items to Be Addressed will help to confirm and ensure the proposed water taking is sustainable and does not pose a significant threat to shallow groundwater resources and the surface water features which depend on those resources.

Peer Review REV 1 – 2026 Strada Shelburne Hydrogeological Assessment Report. 437159 4th Line, Shelburne.



The involvement of HCS on this project is limited to review of the existing information provided in the Tatham Engineering Limited Hydrogeological Assessment Report. No field verification of data or duplication of investigations/analyses was conducted.

HCS and Chris F Helmer assume no responsibility or liability, and shall not be held responsible or liable, for any actions or inactions or decisions, or the consequences of any actions or inactions or decisions, made by any individuals or parties in relation to this project.

We trust that this peer review report satisfies your present requirements, and we thank you for this opportunity to be of service. If you have any questions, or require further hydrogeological consulting services, please feel free to contact the undersigned directly.

Sincerely,

A handwritten signature in black ink, appearing to read 'Chris Helmer', is written over a circular professional seal.



Chris Helmer, B.Sc., P.Geo.
Senior Hydrogeologist
MECP Licensed Well Contractor
www.hydrog.ca

BLUEWATER GEOSCIENCE CONSULTANTS INC.

42 Shadyridge Place
Kitchener, Ontario
N2N 3J1

Tel: (519) 502-8947

E-mail: blemieux@rogers.com

May 19, 2026

Mayor White and Members of Council,
The Township of Melancthon
157101 Highway 10,
Melancthon, Ontario
L9V 2E6
Attn.: Ms. Denise Holmes, A.M.C.T., Clerk-Treasurer

Mayor White and Members of Council:

Bluewater Geoscience Consultants Inc. (Bluewater) was asked to review the report entitled “**Strada Shelburne, Annual Compliance Report**” dated March 25, 2026 and prepared by Tatham Engineering as well as comments made by Council during the May 7, 2026 Council Meeting.

The reviewed report details the 2025 groundwater and surface water monitoring and sampling activities completed for the Strada Melancthon pit. The report is completed as required by the terms of the site Permit To Take Water (PTTW) Number 3210-AKRL9C dated May 8, 2017 and the Integrated Monitoring Plan (IMP) dated February 2018.

During our review of these documents, it appears that the groundwater and surface water monitoring network stipulated in the PTTW and IMP has become degraded through time. This appears to include groundwater monitoring wells that have been destroyed/removed/blocked etc. and are no longer available for monitoring as well as surface water monitoring locations that have been removed/alterd or decommissioned and not reestablished and/or are monitored inconsistently.

Section 4.2 of the PTTW and Table 1 of the IMP provides a list of groundwater and surface water monitoring locations that are required to be monitored and/or sampled on a semi-annual or annual frequency. The requirements of the PTTW indicates these locations ‘shall’ be monitored indicating that all monitoring locations need to be maintained and should any locations become unusable, it must be replaced in a timely manner to continue compliance with the PTTW and IMP.

It appears that as many as nine of the required monitoring locations may no longer be available and/or suitable to fulfill the requirements of the PTTW and IMP. It is reasonable for Council to view these missing monitoring locations as unacceptable and they form a fundamental non-compliance with the requirements of the PTTW and IMP that requires immediate attention.

As such, Bluewater recommends that Council request from Strada (at a timing to be determined by Council) a current inventory of all surface water, pond and groundwater monitoring locations provided in Section 4.2 of the PTTW and/or Table 1 of the IMP. This inventory should include the following information for each location:

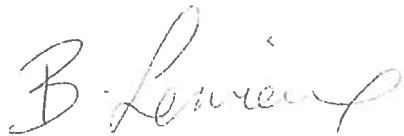
BLUEWATER GEOSCIENCE

1. Is the location currently available, suitable and included in the monitoring/sampling required in the PTTW and IMP. Also, note which stratigraphic unit each location is intended to monitor;
2. Has the location become destroyed/blocked/discontinued/removed and not reestablished, the reason for such and the year in which this occurred. This should include all monitoring locations but is particularly important for pond and surface water monitoring locations. Where any monitoring location has become unavailable or unsuitable through time, we require a 'Plan of Action' to address and reestablish each monitoring location so they can complete adequate on-going monitoring and fulfill their requirements to maintain compliance with the Terms of the PTTW and IMP;
3. Provide an inventory of any monitoring locations added on the site since the PTTW and IMP were initiated, and if they are to be added/included in the on-going monitoring and sampling moving forward. Will Strada seek to amend the PTTW and IMP to reflect/include these new monitoring locations?

During past reviews it was also noted that there have been several instances of Strada taking water outside the April 1 to November 16 time window specified in Section 3.3 of the PTTW. It is difficult to view these occurrences as accidental, as the terms of the PTTW should be quite clear to Strada, and it is reasonable for Council to view these breaches as wilful and as fundamental non-compliance with the terms of the PTTW. Council may want to request further information on why/how these breaches occurred as well as some form of commitment from Strada that it will not happen in the future.

We trust you will find this review suitable for your current requirements, however please feel free to reach out to the undersigned if you require any further information.

Sincerely,
BLUEWATER GEOSCIENCE CONSULTANTS INC.



Breigh J. Levesque, M.Sc., F.GCC., Q.
President, Senior Geoscientist

Date: May 19, 2026