

# IGNITE EXPLORATION INC.

Timmins Nickel District | Registered Ontario Prospector #2003827

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## FORMAL OBJECTION TO THE PROPOSED CRAWFORD NICKEL PROJECT

**To:** Grant Jensen, Impact Assessment Agency of Canada (IAAC)

**Date:** May 1, 2026

**From:** Spencer Phillips, Founder & CEO, Ignite Exploration Inc.

**Project Reference:** Crawford Nickel Project – Impact Assessment #81830

### 1. EXECUTIVE SUMMARY OF OBJECTION

Ignite Exploration Inc., a registered mineral tenure holder in the Duff and Reaume Townships (**144 cells**), formally objects to the current scope and consultation process of the Crawford Nickel Project. The proponent, Canada Nickel Company (CNC), has failed to address technical concerns regarding regional connectivity and cumulative impacts. Furthermore, the Proponent has actively hindered the consultation process through administrative delay, the refusal of capacity funding, and bad-faith communication from its executive office.

### 2. FAILURE OF MEANINGFUL CONSULTATION

Under the *Impact Assessment Act*, proponents are required to engage in "meaningful and transparent consultation." CNC has failed this mandate in the following ways:

- **Administrative Delay & Inference of Concealment:** Ignite Exploration first reached out to CNC on March 28, 2026. Despite the IAAC's directive on March 31, 2026, for the proponent to engage, CNC ignored multiple inquiries for 30 days. We contend this delay was a strategic attempt to run out the clock and suggests an intent to conceal technical risks.
- **Refusal of Capacity Funding:** The Proponent has explicitly refused to provide the capacity funding required for Ignite Exploration to conduct an independent technical audit. This creates a state of **Information Asymmetry**, where a major industrial proponent uses financial attrition to prevent a stakeholder from verifying technical risks to their own assets.

- **Dismissal Without Data & Ignoring Historical Evidence:** On April 30, 2026, the CEO of CNC issued a categorical dismissal of our concerns based on an arbitrary "5-kilometre" distance. This dismissal was offered without any supporting site-specific hydrogeological modelling or technical data. Critically, the Proponent failed to acknowledge or address our mention of historical Shell and Falconbridge drilling data **which explicitly identifies a regional fault line passing through the Duff/Reaume corridor**. By ignoring this structural feature, the Proponent's 'safety claim' is rendered scientifically unsubstantiated.
- **Hostile Engagement & Bad Faith Deflection:** The Proponent's executive leadership attempted to use intimidation tactics by characterizing a registered technical stakeholder as a "nuisance" (**See Appendix A**). Furthermore, the CEO chose to question our corporate "timing" for staking land rather than addressing the potential for mineral sterilization.

### 3. TECHNICAL CONCERNS: INFRASTRUCTURE, HYDROLOGY & CUMULATIVE IMPACTS

Ignite Exploration objects to the Proponent's 'Salami-Slicing' approach (Project Segmentation), which artificially isolates the Crawford pit from the broader regional footprint and cumulative impacts of the planned nickel district:

- **Infrastructure Corridor & Mineral Sterilization:** Our 144 cells sit within the regional infrastructure corridor. The Proponent's reliance on a "5km pit distance" fails to address the fact that ancillary infrastructure such as tailings pipelines, access roads, and power transmission lines typically extends far beyond the pit shell. CNC has failed to provide assurance that this infrastructure will not "sterilize" our VMS targets.
- **Hydrogeological Impact (The Cone of Depression):** Proposed open-pit operations require massive dewatering. CNC has failed to provide a regional model demonstrating that the 'cone of depression' will not impact the water table or mineral potential across our Reaume/Duff tenure. **Critically, the documented fault line in this corridor may act as a high-permeability conduit, transmitting hydrogeological impacts far beyond the Proponent's arbitrary 5 km buffer.**

- **The Mann Project & Cumulative District Linkage:** CNC is publicly promoting a "Regional Nickel District" to investors. However, they have excluded the cumulative impacts of this regional expansion from their current Impact Statement. Our tenure sits directly within this district-scale corridor.

#### 4. REQUEST FOR AGENCY ACTION

Given the Proponent's refusal to provide technical data or engage in professional dialogue, Ignite Exploration Inc. requests that the Agency:

1. **Issue an Information Request (IR):** Require CNC to provide the raw hydrogeological and infrastructure modeling data used to justify their "5km" claim.
2. **Mandate a Capacity Funding Agreement (CFA):** We request the Agency mandate a CFA in the amount of **\$250,000 USD**. This funding is a procedural necessity to facilitate an **independent multi-disciplinary technical audit** (including hydrogeological modelling and VMS resource assessment) that the Proponent has failed to provide through standard consultation channels.
3. **Review the Consultation Timeline:** We request the Agency note the 30-day delay and the dismissive nature of the Proponent's response as a failure of procedural fairness.
4. **Formal Mediation:** We request that any future discussions be moderated by the Agency to ensure professional conduct.
5. **Public Record:** Ignite Exploration Inc. explicitly requests that this formal objection and all accompanying appendices be uploaded to the **IAAC Public Registry for Project #81830** to ensure full transparency for all stakeholders and the public.

## 5. CLOSING STATEMENT

Ignite Exploration Inc. is committed to the responsible development of Ontario's critical minerals. However, "responsible development" cannot occur when a proponent uses its size to bypass technical scrutiny and ignore the rights of local tenure holders.

Sincerely,

**Spencer Phillips**

Founder & CEO, Ignite Exploration Inc.

Ontario Prospector's License: 2003827

## Appendix A: Record of Proponent Communication

### Chronology of Engagement Efforts:

- **March 28, 2026:** Ignite Exploration Inc. ("Ignite") initiated contact with both the Impact Assessment Agency of Canada (IAAC) and Canada Nickel Company (CNC) to formally register concerns regarding tenure overlap and technical risks.
- **March 31, 2026:** The IAAC issued a direct instruction to the Proponent to engage with Ignite as a registered technical stakeholder.
- **April 1 – April 23, 2026:** Period of non-responsiveness from the Proponent.
- **April 24, 2026:** Ignite issued a **Formal Notice** to CNC requesting a technical dialogue and addressing the lack of progress.
- **April 28, 2026:** Ignite issued a **Final Notice** to CNC, noting the persistent failure to engage as mandated by the IAAC.
- **April 30, 2026:** CNC issued its first and only response (provided below).

**Correspondence Received from CNC (April 30, 2026):**

*Spencer,*

*Thanks for your letter. As you can see from the attached map which shows our proposed mine footprint and your mining claims, your claims are at least 5 km away (to the east) from our project and would not be impacted in any way.*

*Also, it appears as though you staked your mining claims after our proposed mine footprint was in the public domain so you staked your claims while under the impression you would be impacted by our mine footprint. We wonder why you would do that and then ask to be compensated without first performing any exploration work.*

*This email will also be forwarded to any other parties to whom you've contacted.*

*We wish you well in your exploration program.*

*Sincerely,*

*Mark Selby*

**Ignite Exploration Inc. Observation on Appendix A:** The Proponent's response followed **33 days** of administrative silence. Rather than addressing the specific **technical references and historical drilling evidence** (Shell/Falconbridge) cited by Ignite, the Proponent chose to question the "timing" and "intent" of a registered tenure holder, a clear departure from the "meaningful and transparent" consultation required under the *Impact Assessment Act*. Furthermore, the Proponent deliberately mischaracterizes a standard request for **Capacity Funding**, a statutory mechanism designed to facilitate independent technical review, as a request for 'compensation.' This further underscores their bad-faith approach to the regulatory framework.

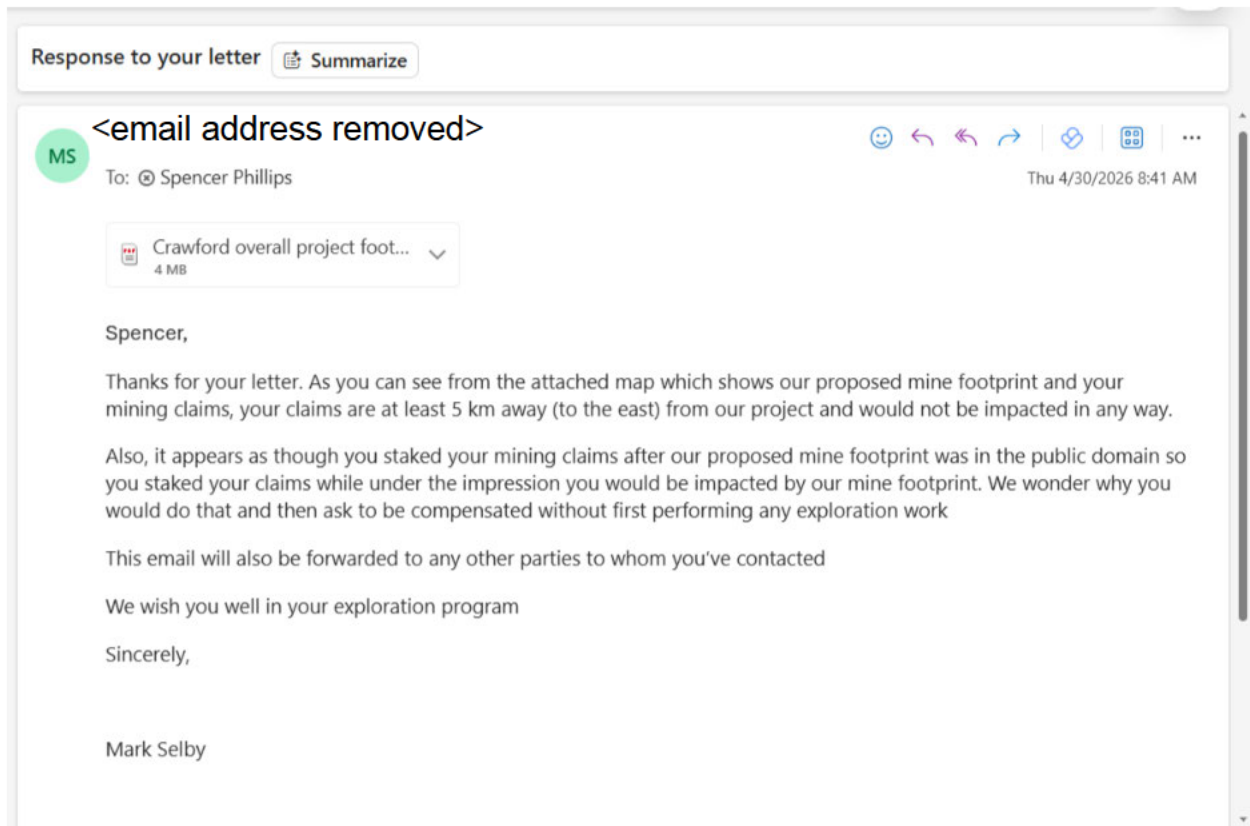


Figure 1: Digital screen capture of correspondence received from Mark Selby (CEO, CNC) on April 30, 2026

## Appendix B: Analysis of Proponent-Provided Project Map

**Context:** On April 30, 2026, the Proponent provided a localized map intended to illustrate that Ignite Exploration's tenure is "at least 5 km away" from the project footprint. Ignite Exploration contends that this map is fundamentally misleading and fails to account for regional industrial realities.

### Key Technical Deficiencies in Figure 2:

- **Omission of Ancillary Infrastructure:** The Proponent's map only displays the primary pit shell. It intentionally excludes planned tailings management areas, access roads, and high-voltage power transmission corridors that are required for a project of this scale. These features are known to extend into the Duff and Reaume townships, directly encroaching on Ignite's tenure.
- **Disregard for Hydrogeological Connectivity:** The "5 km" distance cited by the Proponent is an arbitrary surface measurement. It does not account for the sub-surface "Cone of Depression" caused by massive pit dewatering, which historical data suggests will impact groundwater levels across the regional corridor.
- **Exclusion of Regional Mining District Context:** While the Proponent promotes a "Regional Nickel District" to capital markets, this map "salami-slices" the project to hide the cumulative footprint of the Crawford-Mann-Reaume corridor.
- **Failure to Account for Structural Geologic Connectivity:** The Proponent's map treats the regional geology as a uniform block. It fails to display the **documented fault line** identified in historical Shell and Falconbridge logs. This fault represents a potential direct path for both groundwater drawdown and environmental seepage that connects the Crawford Project site to Ignite's tenure.

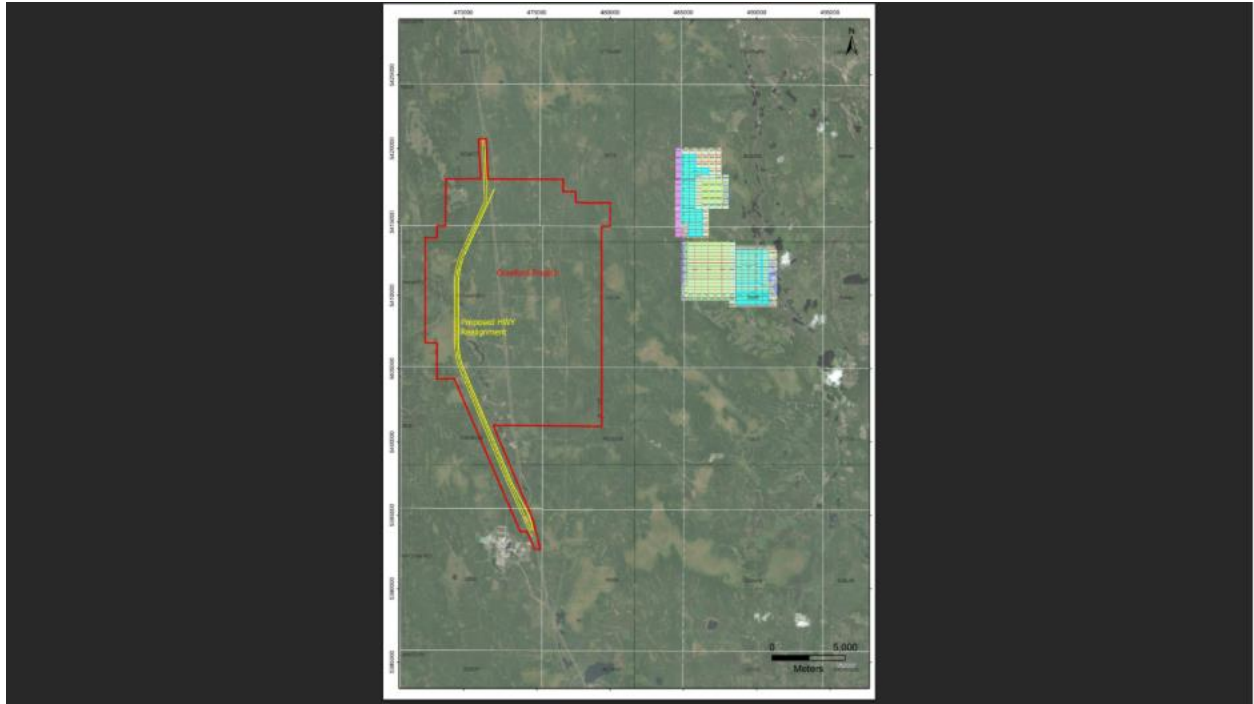


Figure 2: The map provided by CNC. Note the absence of infrastructure modelling beyond the immediate pit perimeter and the lack of regional hydrogeological impact zones.