

JAL EXPLORATION INC.

15281 Marine Drive
White Rock, BC
V4B 1C7

By email: StrangeLake@iaac-aeic.gc.ca

December 4, 2023

Impact Assessment Agency of Canada
901-1550, Estimaerville Avenue
Québec, Quebec G1J 0C1

Dear Sirs / Mesdames:

RE: Review by the Impact Assessment Agency of Canada (“IAAC”) of the Strange Lake Rare Earth Mining Project Proposal of Torngat Metals Ltd., formerly Quest Rare Earth Minerals Ltd. (“Torngat”)

A. Overview – We Request that the IAAC Reject the Strange Lake Rare Earth Mining Project, in its Current Form:

1. JAL Exploration Inc. (“JAL”) is a mineral exploration and mining company incorporated in the Province of British Columbia and having mineral claims located on the Labrador Nunatsiavut Lands since 2010. Our minerals claims will be materially adversely affected by the Strange Lake Rare Earth Mining Project, including what we see as the Torngat Proposal, as we have defined it below. We also see the Labrador Nunatsiavut and the other peoples of Newfoundland and Labrador will be materially adversely affected.
2. JAL is in a unique position as its mineral claims were acquired prior to the date of Torngat’s initial proposal of a roadway to cross Labrador. As a consequence, the damage that JAL will suffer from the roadway proposed by Torngat is unique.
3. **As a consequence, JAL recommends that the IAAC to REJECT the Strange Lake Rare Earth Mining Project in its entirety unless all the changes suggested in this Submission are fully effected and, in particular, the request that Torngat fund condemnation drilling on the JAL Property on the terms and conditions set out in this Submission.**
4. JAL currently holds certain licences comprised of mineral claims which form its Voisey’s Bay West Property (the “**Presently Held Claims**”). For financial reasons JAL was forced in the last few years to relinquish some surrounding mineral claims (the “**Relinquished Claims**”) but JAL would like to re-acquire those mineral claims when they become available for staking. In this Submission, the Presently Held Claims and the Relinquished Claims are herein called the “JAL Property”.
5. The JAL Property is located on Labrador Inuit Lands immediately to the northwest of the Vale Voisey’s Bay Nickel-Copper-Cobalt mining property. JAL has held the Property since 2010 and, for clarity, JAL has held its Property since prior to the date that Torngat initially proposed a roadway to cross Labrador. The primary focus of exploration on the JAL Property is for Ni-Cu-Co

mineralization similar to the Voisey's Bay mineral deposits that are currently being mined. A secondary focus is for kimberlitic-style diamond deposits.

B. Our Review:

6. JAL or JAL and its legal counsel have completed the following:
 - (a) reviewed information presented on the IAAC website;
 - (b) listened to the associated zoom Information Sessions;
 - (c) reviewed Torngat's National Instrument 43-101 technical reports previously filed in SEDAR+; and
 - (d) reviewed Torngat's website.

C. JAL's Concerns:

7. JAL has some very significant concerns which include, but are not restricted to, the following
 - (a) JAL is concerned that the proposed roadway crosses over areas of high priority exploration interest on the JAL Property and the roadway will destroy or adversely affect our mineral exploration rights which we have held before Torngat initially proposed its roadway;
 - (b) JAL is concerned that, other than the Vale's Voisey's Bay mining property, JAL appears to be the only mineral claims holder whose property is to be traversed by the roadway proposed by Torngat and, as a result, JAL will suffer unique and significant damage to the mineral interests;
 - (c) JAL is concerned and insulted that Torngat has repeatedly failed to provide JAL information regarding the Torngat Proposal, including the proposed crossing of the JAL Property despite repeated requests from JAL. The Torngat failure has continued up to today, December 4, 2023, the deadline for JAL filing this Submission to the IAAC;
 - (d) JAL is concerned that Document Number 2 – "Initial Project Description of a Designated Project" dated September 2023 (the "**Initial Project Description**") which is found on the IAAC Website does not fully and adequately disclose Torngat's Strange Lake mining property. One example, amongst others, of the disclosure failure is Map 13-1 of the project on page 83 of the Initial Project Description which fails to disclose the location of Torngat's 63 mining claims located in Newfoundland and Labrador. These Labrador mining claims form a significant portion of the Torngat's Strange Lake property and are mostly located on Labrador Inuit Lands surrounding Exempt Mineral Lands, which Exempt Mineral Lands are Nunatsiavut Lands. JAL also strongly suspects that they are very good evidence of the intention by Torngat to mine in Labrador;
 - (e) JAL is Concerned the Initial Project Description, including, but not restricted to, the Map 13-1 of Torngat claims on page 83 of the Initial Project Description Document fails to show the location and extent of the Main Zone mineral deposit of the Strange Lake property

and, as such, fails to disclose the significance and the extent of the Main Zone mineral deposit being located on Inuit Lands located in Labrador. We believe that the Main Zone mineral deposit is located mostly on those Inuit Lands in Labrador;

- (f) JAL is concerned that Torngat' public disclosure fails to disclose the Newfoundland and Labrador mineral claims that the Torngat proposed "private" road will cross and, in particular, the Torngat disclosure fails to disclose that Torngat's proposed road will cross the JAL Property.
- (g) JAL is concerned that Torngat is attempting to secure a "private" (that word used by Torngat in its Initial Project Description) roadway across Labrador Inuit (including Nunatsiavut) lands and other lands in northern Labrador, including across the JAL Property for what is being described as a Quebec mining project when a better and more accurate description would be a mining project located in both Labrador and Quebec.
- (h) JAL is concerned that the Torngat Proposal appears to significantly benefit Torngat and the Government of Quebec; while at the same time appears:
 - (i) In its current form, to provide little benefit to either (a) the Nunatsiavut Government or the Newfoundland and Labrador Government;
 - (ii) In its current form, no benefit to the existing holders of mineral claims over which the roadway proposed by Torngat is to traverse; and
 - (iii) In its current form, no benefit to the JAL Property mineral claims over which the roadway proposed by Torngat is to traverse.
- (i) JAL is concerned that the Torngat Proposal appears to be detrimental to each of:
 - (i) the Nunatsiavut of Labrador;
 - (ii) the other peoples of Newfoundland and Labrador; and
 - (iii) the holders of mineral claims over which the roadway proposed by Torngat is to traverse, including those mineral claims of JAL; and
- (j) JAL is concerned that the Torngat Proposal will result in an injustice that will be eerily similar to the injustice which resulted from the 1969 Churchill Falls Agreement which provided almost no benefit to those in Newfoundland and Labrador while at the same time providing immense economic benefits to Quebec by providing Quebec virtually free electrical power from the date of the Agreement to 2041 from a hydro-electric project that is wholly located in Labrador.

D. JAL's Understanding of the Torngat Proposal:

- 8. JAL sees and understands that the Torngat Proposal includes the following:
 - (a) Establishing a mine site allegedly in Quebec, with Torngat's Zone B mineral deposit and its mineral claims located in Quebec, but with each of (i) Torngat's Main A Zone mineral

- deposit and (ii) Torngat's Main Zone mineral claims located in both Labrador and Quebec, using Quebec workforce;
- (b) Not establishing a mine site in Labrador using Nunatsiavut workforce and other Labrador workforce;
 - (c) Having a concentration plant located in Quebec using Quebec workforce;
 - (d) Not establishing a concentration plant located in Labrador using Nunatsiavut workforce and other Labrador workforce;
 - (e) Not having a roadway built from the mine site to Sept Iles, Quebec;
 - (f) Causing a roadway to be built crossing Labrador and Nunatsiavut Lands to the Vale Port, or nearby, which area is also being Nunatsiavut Lands;
 - (g) Not causing a roadway to be built from the Quebec mine site to Schefferville Quebec so the concentrated materials are shipped by rail to Sept Iles, Quebec;
 - (h) Not trucking the concentrated materials over a roadway from the mine site to Schefferville, Quebec;
 - (i) Trucking the concentrated materials over the roadway crossing Labrador to the Vale Port or nearby thereby crossing and causing damage to pre-existing mineral claims held in the Nunatsiavut Lands, including the mineral claims of JAL;
 - (j) Also thereby minimizing environmental damage to the Province of Quebec;
 - (k) Also thereby causing environmental damage to the Nunatsiavut Lands in Labrador;
 - (l) Also thereby avoiding the disturbance of the George River Caribou herd animals in Quebec from the establishment of a roadway from the mine site to Schefferville, Quebec;
 - (m) Also thereby causing disturbance of the George River Caribou herd on the Inuit Lands resulting from the establishment of a roadway from the mine site to the Vale Port;
 - (n) Shipping the concentrated ore by ship from the Vale Port or nearby to Sept Iles, Quebec;
 - (o) Not having final processing of the concentrated ore performed in Labrador;
 - (p) Having final processing of the concentrate performed at Sept Iles, Quebec;
 - (q) Thereby overall minimizing economic and employment opportunities for the Nunatsiavut and Inuit and the other peoples of Newfoundland and Labrador;
 - (r) Thereby maximizing the economic and employment opportunities for the people of Quebec;

- (s) Fails to disclose that when the Main Zone is mined by Torngat, there may probable significant increase in the use of the road proposed by Torngat hat is to cross Labrador and increased related environmental damage in Labrador;
- (t) All the while not fully and adequately disclosing in the filings on the IAAC Website that “a significant proportion of Torngat’s Main Zone deposit is situated in the ‘exempt mineral lands (EML)’” as stated in the second paragraph of page 116 of the March 10, 2017 National Instrument 43-101 Technical Report prepared for Torngat and not filed by Torngat in the IAAC Website for the “Strange Lake Rare Earth Mining Project”; and
- (u) And also while not adequately disclosing the recent acquisition by Torngat of mineral claims in Labrador that surround the Exempt Mineral Lands also located in Labrador.

E. The Resulting Injustice:

- 9. JAL submits that all of the above can be seen as providing an injustice to the Nunatsiavut and other peoples of Newfoundland and Labrador and the holders of mineral claims over which the roadway proposed by Torngat is to cross; and
- 10. JAL submits that the injustice is eerily similar to the injustice resulting from the 1969 Churchill Falls Agreement which provided almost no benefit to those in Newfoundland and Labrador while at the same time provided immense economic benefits to Quebec by providing Quebec virtually free electrical power from the date of the Agreement to 2041 from a hydro-electric project wholly located in Labrador.

F. We Request Rejection of the Torngat Proposal:

- 11. JAL insists that the Federal Government of Canada, including its IAAC, must act to prevent a further injustice to Newfoundland and Labrador, the people of Newfoundland and Labrador, including the Nunatsiavut, and must REJECT the Torngat proposal in its current form.
- 12. In the event that the IAAC requests changes to the Torngat Proposal as we have suggested in the Submission, JAL would be willing to support the revised Torngat Proposal subject to JAL’s careful review of those changes to ensure that they reflect the changes herein suggested by JAL.

G. JAL’s Experience:

- 13. We have identified by aerial surveys, past exploration, and subsequent studies, several areas of high priority interest on the Property which have not yet received follow-up ground exploration that occur along or near the proposed route for the road corridor.
- 14. As a result, after the geotechnical work conducted by Torngat was completed in 2013, JAL made requests of Torngat (then called Quest Rare Minerals Ltd.), that it provide JAL more detailed information on the proposed route and the work conducted by Torngat relating to the JAL Property. But Torngat did not provide that information. JAL recently made another request to Torngat for more detailed information on the proposed route and work conducted by Torngat. But, Torngat still has not provided JAL any such information. We will return to this topic later in this Submission. This has harmed us as we would have liked to have had that information in order to better prepare our comments herein to the IAAC prior to the December 4, 2023 deadline.

H. Cost-Benefit Analysis:

15. We are looking at the roadway proposed by Torngat using a cost-benefit analysis lens.

I. Possible Benefits if the Nunatsiavut Intervene and Make Demands:

16. We note that Torngat describes its proposed roadway as its “private” road. If the Nunatsiavut and Newfoundland and Labrador Governments and the holders of mineral claims in Labrador were to have access to that proposed roadway, there could be possible benefits to JAL, to the Nunatsiavut Government, and to the Newfoundland and Labrador Government. If access were granted, the presence of the roadway would increase access to mineral exploration properties, thereby giving economic benefits in the form of exploration employment, possible mining employment, and possible future taxation benefits. Once again, we note that the Nunatsiavut would be a beneficiary pursuant to the terms of the Land Settlement Agreement, of the increased mineral revenue.

17. We are somewhat puzzled and dismayed that we are not aware of the Newfoundland and Labrador Government having insisted on the final processing be completed in Newfoundland and Labrador just as the Newfoundland and Labrador Government insisted that Vale do. Our understanding is that if the final processing was conducted in Labrador, that there would not be any increase in the resulting use of the roadway proposed by Torngat. Nonetheless, the final processing is proposed by Torngat to be completed on the shores of the St. Lawrence in Quebec, and not on the shores of Newfoundland and Labrador. The result of the Torngat proposal is that instead of providing highly skilled job opportunities to the Nunatsiavut of Labrador and the people of Newfoundland and Labrador, Torngat proposes that all those job opportunities go to the city of Sept Iles in the Province of Quebec. The imbalance of the benefits of the Torngat proposal that flow to Quebec and to Newfoundland and Labrador is further alarming and dismaying when it is noted that although the central part of Torngat’s Main Zone mineral deposit is located in Quebec Labrador border, the Torngat’s Main Zone mineral deposit and the Torngat mineral claims cross the Quebec-Labrador border and extend significantly into Labrador. From reading some of the Torngat disclosure documents we see that at least 63 of the Torngat mineral claims are located on mostly Labrador Inuit Lands and some other Labrador lands.

18. We have attached to this email to you pages 17 to 19 of the March 10, 2017 National Instrument 43-101 Technical Report, on the Strange Lake Property prepared for Torngat by Micon International Ltd. for Torngat (the “**Technical Report**”). We located the Technical Report in SEDAR+. As an aside, and for your information, SEDAR+ is a website that was established by the 13 Canadian Securities Regulatory Authorities, that is, the Securities Authorities for the 10 provinces and 3 territories of Canada, which was established to contain disclosure documents of all reporting issuers in Canada. Prior to its bankruptcy, Torngat was a reporting issuer and, therefore, was previously required to file disclosure documents in SEDAR+.

19. You can see Table 4.1 found in page 18 of the Technical Report shows a summary of the Strange Lake Property by Province and page 19 of the Technical Report contains a Figure 4-2. This Figure 4-2 is very important as it discloses all of the following:

- (a) the “Main Zone”, being Torngat key mineral deposit, allegedly is marked by a red-star. Note carefully that the Figure does NOT disclose the extent or boundaries of the Main Zone mineral deposit (which we find surprising). We question whether the centre of the

mineral deposit is represented by the star as it is wholly possible that the centre of the Main Zone mineral deposit is to the east of the Labrador-Quebec border and in the Exempt Mineral Lands in Labrador. We are simply unsure because of the inadequacy of the Torngat disclosure, but subsequent Torngat staking of mineral claims in Labrador is highly suggestive that the mineral deposit is well within Labrador;

- (b) the “Zone B” being Torngat’s secondary mineral deposit marked by a yellow star (the Figure does NOT disclose the extent or boundaries of this Zone B mineral deposit and we speculate that the yellow star may be intended to represent the centre of the mineral deposit);
- (c) the Labrador Inuit Lands marked by the orange colouring;
- (d) the Torngat mineral claims as of March 10, 2017, which are located within the red lines and also coloured orange(the orange indicates Labrador Inuit Lands); and
- (e) the Nunatsiavut Exempt Mineral Lands marked by the diagonal green lines, all of which are located in Labrador.

20. The Figure 4-2 fails to clearly disclose the location of the Labrador – Quebec border. Our research indicates that the border is the following:

- (a) the line that separates the area in white (which is Quebec) from the Labrador Nunatsiavut Exempt Mineral Lands (disclosed by green diagonal lines)
- (b) the line that separates the lands in orange (being Labrador Inuit Lands) that are found in the red rectangle and the lands in white (which is Quebec) found in red rectangle, and
- (c) the line that separates the land in gray (Labrador) from the land in white (one again, Quebec) which lies to the north and to the south of the lines in (a) and (b).

21. With that understanding of the location of the Labrador-Quebec border, and with the knowledge that mineral deposits generally cover a significant surface area, one can see that a very significant large portion of the Main Zone mineral deposit lies on the Labrador side of the Labrador-Quebec border.

22. Further, we can only speculate as to the location of the center of the Main Zone. The red star in Figure 4.2 might be intended to represent the center of the Main Zone deposit. But, it is important to know, that since 2005 which is the date that some Labrador Nunatsiavut Lands were designated as Exempt Mineral Lands, no one could be acquire (also called stake), the Labrador Nunatsiavut Exempt Mineral Lands. If the centre of the deposit were located on the Labrador side of the border, one can readily guess that Torngat would be reluctant to disclose that fact and, would be more comfortable with suggesting that the centre of the Main Zone, which is the primary mineral deposit, is located in Quebec. But notice very carefully the red star in Figure 4.2 actually crosses the Labrador –Quebec border. Once again, much clearer disclosure by Torngat is required.

23. One can also conclude that the reason Torngat’s current focus is not to mine the Main Zone, which is apparently Torngat’s primary mineral deposit, is that possibly one-half, and possibly significantly more of the Main Zone mineral deposit is located on the following:
- (a) the Exempt Mineral Lands, which are located fully in Labrador;
 - (b) the Labrador-Inuit Lands, which are also located fully in Labrador, and
 - (c) the other portions of Labrador not included in either the Exempt Mineral Lands or the Inuit Land.
24. Note carefully, that Figure 4.2 from the March 10, 2017 Technical Report reflected the claim status of Torngat in February 2017 and, for further certainty, does not reflect the current status of the Torngat mineral claims
25. Since February 2017, Torngat has staked an additional 33 claims in Labrador which are located (a) to the south, east and north of the Labrador Inuit Lands and (b) also north of the Labrador Nunatsiavut Exempt Mineral Lands. This fact can be confirmed by looking at the attachment entitled “Geoscience Atlas” which was produced by JAL on November 29, 2023 and comparing it with Figure 4.2 which, once again, is from the March 10, 2017 Torngat Technical Report.
26. As an aside, the Geological Survey Division of the Mining and Mineral Development Branch of the Government of Newfoundland has a website located at <https://geoatlas.gov.nl.ca/Default.htm>. The attached document entitled, “Geoscience Atlas” came from that website.
27. The additional claims disclosed in the document entitled, “Geoscience Atlas” produced November 29, 2023 are in white to the north of the Exempt Mineral Lands, which are in purple, and to the north of the Labrador Inuit Lands which are in pink, the east of the Labrador Inuit Lands in pink and to the south of the Labrador Inuit Lands in pink. To be clear, all of those mineral claims are located in Labrador.
28. You can confirm the number of additional minerals claims in Labrador by the following steps:
- (a) Go to the Government of Canada Impact Assessment Agency website for the “Strange Lake Rare Earth Mining Project, which is located [HERE](#);
 - (b) Cursor downwards until you see the heading, “Key documents” and click on “PDF (68 MB)” in the first row which is Document Number 2 – “Initial Project Description of a Designated Project” dated September 30, 2023 and a document will load in your computer, with the title, “Strange Lake Rare Earth Mining Project” dated September 2023.

- (c) Now insert page number 110 in the space before “/471” found near the top of your browser and that will take you to page 82 of that document and now go to the heading, “13.3 Official Land Description”. The first two sentences are as follows:

“13.3 Official Land Description

All the mineral claims covering the B-Zone of the Strange Lake Project are owned in totality by Torngat Metals. The project is covered by 209 individual mineral claims in Québec and 63 “cells” in the Newfoundland and Labrador claims licence system.

- (d) Now go to the attached page 18 (we have attached pages 17, 18 and 19 together as one file) of the March 10, 2017, Technical Report which contains “Table 4.1 Summary of Strange Lake Mineral Claims by Province”. That Table 4.1 states that there were only 30 mineral claims in Labrador. So, since March 10, 2017, Torngat has staked at least an additional 33 mineral claims in Labrador.

29. Now we turn to Document Number 2 – “Initial Project Description of a Designated Project” dated September 2023 found on the IAAC Website and which we previously defined as the “Initial Project Description”.

30. First on page 82 of the Initial Project Description, the following is stated:

13.3 Official Land Description

All the mineral claims covering the B-Zone of the Strange Lake Project are owned in totality by Torngat Metals. The project is covered by 209 individual mineral claims in Quebec and 63 “cells” in the Newfoundland and Labrador claims licence system. Those claims are covering a total of approximately 9 994.65 ha (MICON, 2019). **Map 13-1 illustrates the Torngat Metals mining claims. [emphasis added by JAL]**

31. The bolded sentence above is NOT CORRECT. By looking at page 83 of the Initial Project Description you will see that Map 13-1 discloses ONLY the mineral claims located in Quebec. To be clear, Map 13-1 does NOT disclose the 63 mineral claims located in Newfoundland and Labrador and, as a result, the above bolded sentence found in section 13.3 of the Initial Project Description is false.

32. If you look at Map 13-1 found on page 83 of the Initial Project Description (we have attached pages 82 and 83 together as one file) you will see that:

- (a) Map 13-1 does not disclose the location of the Exempt Mineral Lands;
- (b) Map 13-1 does not disclose that the Exempt Mineral Lands are located in Labrador;
- (c) Map 13-1 does not disclose the location of the mineral claims that form Torngat’s Main Zone mineral deposit;
- (d) Map 13.1 does not disclose the fact that a very significant portion of the Main Zone mineral deposit is located on the Nunatsiavut Exempt Mineral Lands, the Labrador Inuit Lands and other Labrador Lands; or

- (e) Map 13.1 does not disclose the existence of and the location of the 63 mineral claims located in Labrador held by Torngat, most of which are located on Labrador Inuit Lands in Labrador and some of which in other Labrador lands.
33. It appears that the 63 mineral claims located in Labrador form a significant part of the Strange Lake property and this is not disclosed in the Initial Project Description filed in the IAAC Website.
34. To be clear, Map 13.1 found on page 82 does NOT disclose:
- (a) any of the mineral claims located in Labrador that were disclosed in Figure 4.2 of Torngat's March 10, 2017 Technical Report; and
 - (b) any of the 33 mineral claims located in Labrador that were subsequently staked by Torngat.
35. In other words, the Initial Project Description filed in the IAAC Website does NOT include ANY map of ANY mineral claims located in Labrador and held by Torngat. JAL sees that being a serious disclosure omission resulting in a reader not understanding that a significant portion of the Strange Lake Project being located in Labrador.
36. The location of the 63 mineral claims, including the recently staked additional 33 mineral claims strongly suggest that a very significant portion of the primary mineral deposit is located in Labrador and in the Exempt Mineral Lands and that Torngat's intention is to attempt to stake all of the adjacent Exempt Mineral Lands as soon as they become available for staking and then mine in Labrador.
37. To the best of our memory neither of the two sessions disclosed and of the following:
- (a) the recent staking by Torngat of the Labrador mineral claims;
 - (b) the location of the Torngat mineral claims in Labrador;
 - (c) the location and extent of the Main Zone mineral deposit of the Strange Lake Rare Earth Property;
 - (d) that a very significant portion of the Main Zone mineral deposit, which is the primary mineral deposit of Torngat, is located in Labrador and located (i) in Exempt Mineral Lands in Labrador, (ii) in Labrador Inuit Lands located in Labrador and (iii) in other lands located in Labrador; and
 - (e) that the total number of mineral claims held by Torngat in Labrador was 63.
38. So, at the two information sessions, when Torngat stated that its mine is located in Quebec, we say that statement was misleading as:
- (a) that statement failed to state that a possibly very significant portion of the Main Zone mineral deposit is located in Labrador, including on (i) Exempt Mineral Land, (ii) Labrador Inuit Lands, and (iii) other lands in Labrador;

- (b) that statement failed to state that Torngat currently does not have mineral claims covering a significant portion of the Main Zone mineral deposit which is located on Exempt Mineral Lands located in Labrador;
 - (c) that statement failed to state that the Exempt Mineral Lands are currently not available for staking and, if and when those lands become available for staking, there is no guarantee that Torngat will be the successful in staking those Exempt Mineral Lands;
 - (d) that statement failed to state the number of mineral claims located in Labrador and held by Torngat;
 - (e) that statement failed to state the location of the Torngat mineral claims on Labrador Inuit Lands in Labrador, which are located to the north, east and south of the Exempt Mineral Lands; and
 - (f) that statement failed to state that Torngat was proposing to mine Zone B at this time, because much of Torngat’s primary mineral deposit, that is, the Main Zone, was located in Labrador and most of which is currently not subject to mineral claims held by Torngat.
39. It appears clear that the information sessions held by the IAAC significantly understated the significance of the Main Zone mineral deposit being located in Labrador.
40. Further, we do not see any documents filed by Torngat in the IAAC Website that disclose:
- (a) the location of the roadway proposed by Torngat as it crosses any mineral claims in Labrador; and
 - (b) the location of the roadway proposed by Torngat as it crosses the JAL Property.
41. It clear, that the Torngat Proposal does not protect the economic rights of the Labrador Nunatsiavut, the Labrador Inuit, Newfoundland and Labrador, and the holders of mineral claims located in Labrador, including JAL.
42. That damages not only the people in Newfoundland and Labrador, but also specifically the Nunatsiavut, as pursuant to (a) section 7.3.1 of the Labrador Inuit Lands Claims Agreement and (b) Section 8 of the Labrador Inuit Land Claims Agreement Act, the Nunatsiavut are to receive “25% of the Revenue from Subsurface Resources in Labrador Inuit Lands”.
43. Further, by reading the Newfoundland Labrador Environment and Climate Change webpage, at <https://www.gov.nl.ca/ecc/projects/project-2272> we see that Bernard Davis, the Newfoundland and Labrador Government Minister of the Environment and Climate Change, appears to be suggesting that the Newfoundland and Labrador Government will be providing its consent by December 14, 2023. That is very troubling in light of the fact that the Newfoundland and Labrador Government must know that without changes to the Torngat proposal, there will be a lack of benefits to the Nunatsiavut, the Nunatsiavut Government and the Newfoundland and Labrador Government. And, the Minister must know, or ought to know, that the mineral rights of JAL will be wrongfully damaged by the present Torngat proposal. Further, a period of 10 days (that is, from December 4, 2023, the deadline for comments to the IAAC, and December 14, 2023), does not appear adequate period for the required proper review and understanding of submissions to

the Newfoundland and Labrador Government and questioning of those who provided submissions or comments.

44. Therefore, we see that without significant changes to the Torngat Proposal, the possible benefits to (a) JAL, (b) the Nunatsiavut, (c) the Nunatsiavut Government, and (d) the Newfoundland and Labrador Government pale dramatically in comparison to the benefits to (e) Torngat and (f) the Province of Quebec.
45. JAL's suggested changes contained in this Submission would increase the benefits to each of (a) the Nunatsiavut, (b) the Nunatsiavut Government and (c) the Newfoundland and Labrador Government, while at the same time would avoid damage to JAL's mineral rights while at the same time allowing a revised Torngat Proposal to proceed.
46. Once again, we are suggesting that the IAAC REJECT the Torngat Proposal, in its current form, and we are asking for the strong support from the IAAC for our suggestion changes set out in this Submission.

Costs:

Similar to a Wrongful Expropriation:

47. A cost analysis also discloses some significant concerns. The existence of the road could render valueless the mineral exploration and mining development of those lands not only beneath the roadway, but also along each side of the roadway, especially for those persons who have had mineral exploration rights since prior to the initial proposal for the roadway. Those persons (such as JAL) with pre-existing mineral rights are in a unique position in that the establishment of the roadway proposed by Torngat and its resulting damage to JAL and other rights holders is analogous to a wrongful expropriation, especially in the case of JAL whose mineral rights pre-date the date of the initial proposal by Torngat for the roadway.
48. JAL is not aware of any holder of mineral rights in Labrador whose mineral claims existed prior to the date of the initial proposal by Torngat for a roadway and whose mineral claims are to be crossed by the roadway proposed by Torngat other than Vale.
49. To be clear, those who acquired minerals rights after the roadway proposed by Torngat and whose mineral property would be crossed by the roadway proposed by Torngat would also be damaged, but not to the extent that JAL's mineral rights would be damaged as JAL held its mineral claims prior to the date of Torngat's initial proposal of the roadway.

Environmental:

50. And, also the roadway proposed by Torngat could present environmental damage, including damage to the Caribou and other wildlife. We do not have the expertise in that area and, therefore, this Submission does not relate to all those possible damages, other than we have suggested below that there be an environmental review or inspection on the JAL Property or periodic environmental inspections on the JAL Property during the period of condemnation drilling on the JAL Property, with the cost of the inspections to be borne solely by Torngat. See para 80 below.

51. Having admitted that we do not have expertise in the environmental area, we can give only some very basic comments on the following environmental issues:

- (a) We would like to see that the flow of the waterways, including streams and rivers on the JAL Property is not restricted, even during flooding or storming times. We understand that this would require larger than normal culverts under the roadway to be employed.
- (b) We would like to see that the migration or movement of wildlife over the JAL Property is not hampered. We understand that this might include specially designed passage ways located in appropriate places beneath the roadway proposed by Torngat.
- (c) We would like to see that non-toxic materials are used to maintain the roadway proposed by Torngat, especially on the roadway while it crosses the JAL Property.

J. JAL is a unique case:

52. JAL is a unique case for a few reasons. First, the date that JAL acquired its mineral rights pre-dates the initial proposal of the roadway by Torngat. In other words, JAL acquired its mineral rights without the knowledge that its mineral rights would be damaged by the roadway proposed by Torngat.

53. For those that acquired mineral rights after the Torngat proposal, it can be argued that those persons knew of the risk when they acquired their mineral rights and, therefore, the damage to them is less.

54. Second, JAL has already conducted some exploration and that exploration suggests the potential on the JAL Property for not only mineralization and a mining deposit, but also indicators of a diamondiferous kimberlite on the JAL Property.

55. As a result, we respectfully suggest that the IAAC treat JAL uniquely and unlike others along the roadway proposed by Torngat.

K. Proposed Condemnation Drilling:

56. We see one solution to this pending damage to each of JAL, the Nunatsiavut Government, and the Newfoundland and Labrador Government is:

- (a) fulsome “condemnation drilling” on the proposed roadway location on the JAL Property with the costs to be borne solely by Torngat; and
- (b) the employment and service provider benefits to accrue to the Nunatsiavut of Labrador.

57. We suggest that this elegant solution is very reasonable as it will allow both (a) the roadway to possibly proceed, subject to the possible approval of the Nunatsiavut Government and, if needed, the Newfoundland and Labrador Government and (b) the avoidance of damage to the mineral rights held by JAL. Effectively, condemnation drilling on the JAL Property on the terms proposed by JAL will provide a method for JAL and Torngat to share the surface lands covered by JAL’s mineral claims.

58. Condemnation drilling is a common practice for all mining sites, including the Torngat mining site in Quebec. When a piece of infrastructure (for example, a roadway, mill site, processing site, among others) is proposed on a mineral property, the site of that proposed infrastructure is first drilled to ensure that the land and the immediate surrounding area is not mineralized. If it is not mineralized, then the infrastructure can proceed at that proposed location. But, if there is mineralization, then the further drilling must be conducted until the further drilling discloses a locations barren or vacant of any mineralization.
59. For example, in sections 9.4.1, 10.4 & 10.5.1 located at pages 46, 54 and 57 of the Technical Report (we have attached pages 46, 54 and 57 together as one file) that Torngat conducted condemnation drilling for the Strange Lake mine pit design and tailing pond. So, it is clear that Torngat is well aware of the needs and benefits of condemnation drilling and yet Torngat did not offer condemnation drilling to JAL. To be clear, that is not offered in Torngat's Initial Project Description.
60. Vale also would have completed condemnation drilling for planning their Voisey's Bay mine infrastructure, including the mineral processing plant, tailings pond and road to the Vale port, to ensure that no infrastructure or anything else was located upon potentially economic mineralization.

L. **Terms of the Condemnation Drilling:**

61. We ask that the IAAC that the IAAC require that Torngat fund fulsome Condemnation Drilling on the JAL Property and that specific terms of the fulsome condemnation drilling would include, but not be restricted to, the following.
62. We ask the IAAC ensure that the condemnation drilling is to be diamond core drilling.
63. We respectfully ask the IAAC ensure that the condemnation drilling will include drilling at the centre of the proposed roadway for the full distance of the proposed roadway on the JAL Property and therefrom in both directions horizontally perpendicular to the direction of the proposed roadway every 25 meters for an initial minimum total of 250 meters from the center of the roadway and to an initial minimum depth of 350 meters from the surface of the roadway.
64. If there is either (a) indication of any mineralization in any of the drill holes or (b) any indicators of a possible diamondiferous kimberlite in any of the drill holes, then we ask the IAAC to ensure that the further drilling must continue outwards every 25 meters until both (a) there is no indication of mineralization and (b) there is a sufficient distance (deemed to be at least 150 meters) from any drill holes that either (a) indicate any mineralization or (b) contain any indicators of a possible diamondiferous kimberlite so the proposed relocation of the roadway will not interfere with any future exploration or potential development of that mineralized area on the JAL Property.
65. If there is either (a) any indication of any mineralization in the drill hole, or at or near the bottom of the drill hole or (b) any indicators of a possible diamondiferous kimberlite in the drill hole or at or near the bottom of the drill hole, then we ask the IAAC to require that such drill holes are to be deepened until there is no indication of mineralization and no indicators of a possible diamondiferous kimberlite. This term is important, as it will affect the horizontal distance from the drill hole that drilling must be undertaken to confirm the lack of indication of mineralization

or lack of indicators of a possible diamondiferous kimberlite on any adjacent land, as for any open pit mining, the greater the depth of the drill hole would result in a larger horizontal footprint from the last drill hole containing any indication of mineralization or any indicators of a possible diamondiferous kimberlite.

66. We respectfully ask that the IAAC not only require that Torngat fund the condemnation drilling on the JAL Property, but also that the condemnation drilling be conducted on the JAL Property on the terms suggested and approved by JAL, and also that such condemnation drilling be on terms approved by the Nunatsiavut and that be a condition of any possible approval of the Torngat Proposal and roadway by the IAAC.

M. Torngat to be Wholly Responsible for Condemnation Drilling Costs:

67. We ask the IAAC not only ensure that Torngat will be responsible for the full costs of the condemnation drilling on the JAL Property, but also ensure that such responsibility for costs be a condition of any possible approval of the roadway by the IAAC.

68. We respectfully ask the IAAC to ensure that the condemnation drilling costs would include not only all drilling costs, but also (a) all related costs including, but not restricted to, (b) program planning and program permitting with the Nunatsiavut Government and the Newfoundland and Labrador Government, (c) the initial Environmental Site Assessment & an Environmental Protection Plan, (d) posting of any financial security required, (e) establishment of work camp, (f) mobilization costs, (g) transportation and storage of drill core, (h) splitting of drill core, (i) logging of drill core, (j) testing of the split drill core, (k) interpretation of drill core, (l) demobilization costs (m) production of various relevant technical reports including NI 43-101 Technical Reports, (n) preparation of assessment reports and their filing with the Provincial Newfoundland and Labrador Government, (o) production of reports to and communications with the Nunatsiavut Government, Torngat, and the Newfoundland and Labrador Government, and (p) general management and overhead.

N. Torngat to be Responsible for Funding Condemnation Drilling:

69. We ask the IAAC ensure that Torngat be solely responsible for the funding of such condemnation drilling on the JAL Property, including the requirement that Torngat to prepay, from time to time, a reasonable percentage (say 30%) of the total of (a) the estimated costs plus (b) a contingency of, say 20%, until full payment is made by Torngat for such condemnation drilling and we ask that the IAAC require that not only Torngat be solely responsible for such funding, but also that Torngat's funding for such costs be a condition of any possible approval of the Torngat Proposal and the roadway by the IAAC.

O. Ownership of all things produced in the Condemnation Drilling:

70. We ask the IAAC to ensure that JAL would retain the sole ownership of all drill core, samples, data, reports, and other things directly or indirectly produced relating to the condemnation drilling on the JAL Property. In other words, despite the funding obligations of Torngat, that we ask the IAAC require that Torngat is not to obtain any title to any drill core, samples, data, reports, or any other things directly or indirectly produced relating to the condemnation drilling on the JAL Property.

P. **JAL asks to be Given Privilege to Use Roadway:**

71. We ask the IAAC to require that Torngat not prevent JAL from accessing the roadway and we ask that such be a condition of the IAAC possibly approving the roadway proposed by Torngat.
72. We ask the IAAC to ask the Nunatsiavut Government to grant JAL, subject to the terms and conditions of an approved Work Plan submitted by JAL to the Nunatsiavut Government and approved by the Nunatsiavut Government, the privilege to use the proposed roadway from the port site to the JAL Property but only on terms approved by the Nunatsiavut Government.
73. In the event that the IAAC approves the proposed roadway, subject to the terms and conditions of a Work Plan submitted by JAL to the Nunatsiavut Government and approved by the Nunatsiavut Government, JAL anticipates that it would need to use that proposed roadway only very infrequently. JAL would expect that the Nunatsiavut Government would set a maximum number of days per year that JAL could use that proposed roadway. Of course, the Nunatsiavut Government would determine which days would be acceptable.
74. JAL adds that there will be environmental advantages in granting some limited privileges to JAL to use the proposed roadway as the environmental damage caused by JAL using airplanes or helicopters to access the JAL Property would be reduced or eliminated.
75. We also note that the Nunatsiavut Government currently restricts the use of helicopters or planes from performing airborne surveys from May 15 to October 15 of each year in order to protect the Caribou. The limited use of the proposed roadway by JAL to access the JAL Property instead of JAL flying to the JAL Property would provide an additional reduction of the impact on the Caribou and would provide an additional reduction of other impacts on other aspects of the environment.

Q. **No cost to JAL for Right to Use Roadway:**

76. We ask the IAAC to ensure that Torngat will not charge any fees to JAL for using the proposed roadway and we ask the IAAC ensure that prohibition of Torngat imposing any costs on JAL be a condition of any possible approval of the Torngat Proposal and the roadway by the IAAC.

R. **Maintenance of Roadway:**

77. We ask the IAAC to ensure that Torngat is required to maintain, at its sole cost, the roadway in such a condition that JAL will be able to conveniently and safely use the roadway at those times that the Nunatsiavut Government approves and we ask that such obligation of Torngat be a condition of any possible approval of the Torngat Proposal and roadway by the IAAC.

S. **Roadway not to Diminish or Adversely Affect JAL's future Right to Conduct Underground Mining Beneath the Roadway:**

78. Should JAL discover a mineral deposit below the condemnation drilling conducted on the JAL Property or the roadway, we ask the IAAC ensure that Torngat agrees that the roadway will not hamper or adversely affect JAL's privilege to conduct underground mining beneath either the roadway or beneath any other surface of the JAL Property on which condemnation drilling was conducted and we ask the IAAC that such obligations of Torngat be a condition of any possible approval of the Torngat Proposal and roadway by the IAAC.

T. Torngat to Construct Access from the JAL Property to the Roadway:

79. We ask the IAAC to ensure that Torngat builds at least four different short access roads from the proposed roadway onto the JAL Property at locations to be selected by JAL and as approved by the Nunatsiavut Government and we respectfully ask the IAAC ensure that Torngat be responsible for the full costs of the building of those four short access roads and we ask the IAAC that the Torngat building of the four short access roads at the sole cost of Torngat be a condition of any possible approval of the proposed Torngat Proposal and roadway by the IAAC.

U. Environmental Studies, Reports, and Inspections:

80. We understand that the Nunatsiavut Government would require at least one environmental study and report and one inspection in order for the Nunatsiavut to approve the proposed condemnation drilling on the JAL Property. We wonder if it would be a good opportunity to require multiple periodic environmental studies, reports and related inspections on behalf of the Nunatsiavut Government and that reports be required to be produced and delivered to the Nunatsiavut Government. We ask the IAAC to require Torngat be held responsible for the costs of such environmental studies, inspections, and reports, and those obligations be a condition for any possible approval of the Torngat Proposal and roadway by the IAAC.

V. Condemnation Drilling to Commence Promptly:

81. As can be readily seen, such condemnation drilling must be done prior to both of (a) any possible approval for the proposed route of the roadway and (b) the start of the construction of the proposed roadway. In other words, one cannot approve the location of a roadway until one knows the exact location of the roadway and one cannot determine the exact location of the roadway over the JAL Property until the condemnation drilling on the JAL Property has been fully completed. Accordingly, we ask the IAAC that the possible approval of the IAAC include a term that Torngat must promptly make pre-payment for the condemnation drilling in order that the condemnation drilling can commence as early as possible in 2024, but only at a date that is acceptable to the Nunatsiavut Government and that the IAAC require Torngat do all such things necessary, including making the initial 30% pre-payment to JAL for the condemnation drilling, so that JAL can commence its permitting process with the Nunatsiavut Government to prepare and file the permit application with the Nunatsiavut Government in order to allow for the prompt commencement and completion of the condemnation drilling and in further order to provide information to the IAAC to be able to determine, on an informed basis, whether it will provide its possible approval for the Torngat Proposal and roadway proposed by Torngat.

W. JAL's Commitments to the IAAC:

82. JAL hereby commits in writing to ensure that the workforce for its condemnation drilling on the JAL Property will include as many Nunatsiavut as reasonably possible.

83. JAL also commits in writing to give first consideration to Nunatsiavut to provide goods and services for its condemnation drilling conducted by JAL on the JAL Property.

84. JAL also commits in writing that its condemnation drilling commitments herein not only apply to the Presently Held Claims, but also to the Relinquished Claims should JAL be successful in re-acquiring the Relinquished Claims.

85. JAL anticipates that cost of such condemnation drilling would be significant and, as a result, the employment opportunities for the Nunatsiavut and other opportunities for the Nunatsiavut to provide goods and services, would be significant.

86. Further, JAL agrees that these above commitments be conditions of any possible approval to be given by the IAAC for Torngat Proposal and the condemnation drilling on the terms set out herein.

X. **Ownership of the Proposed Roadway:**

87. We are also very concerned about the wording that Torngat has used in its various materials when describing the roadway proposed by Torngat. Torngat appears to suggest that the proposed roadway would be the “private” roadway of Torngat. After consulting our legal counsel, we do not see that the Labrador Inuit Lands Claim Agreement (which is a constitutional document) would allow for Torngat to have any ownership rights and we do not see that the Labrador Inuit Lands Claims Agreement would allow either the Federal Government or the Government of Labrador and Quebec to expropriate any Nunatsiavut Land for such roadway. Thus the suggestion by Torngat that the road would be “private” is misleading. We not only see the Nunatsiavut Government as retaining title to the roadway, but also we see that the Labrador Inuit Lands Claim Agreement requires that the Nunatsiavut Government maintain title to the roadway.

88. JAL would rather not have Torngat have any ownership rights to the proposed roadway, but simply be granted something less by the Nunatsiavut Government, perhaps something in the nature of a privilege to build, maintain, and use the proposed roadway on terms approved by the Nunatsiavut Government. We see that this is in within the sole constitutional jurisdiction of the Nunatsiavut Government as the Nunatsiavut Government owns the surface rights pursuant to the terms of the Labrador Inuit Lands Claim Agreement. We would prefer to see that such privilege was revocable by the Nunatsiavut Government on various terms including in the event of any breach of Torngat of any of the requirements of the Nunatsiavut.

89. Thus, as a consequence of JAL having obtained legal advice, JAL believes that there are strong legal arguments that Torngat, need not be given any title whatsoever to the proposed roadway and that the Torngat wording in its documents suggesting that the roadway would be Torngat’s “private” roadway is misleading and not correct.

90. JAL asks the IAAC to respect the Nunatsiavut Government and ensure that no title of any kind is conveyed to Torngat. JAL advises that it is much more comfortable dealing with the Nunatsiavut and Newfoundland and Labrador Governments than dealing with Torngat, especially in light of:

- (a) Torngat’s repeated failure to provide information to JAL;
- (b) an apparent lack of intention by Torngat to maximize benefits to any of (i) the Nunatsiavut, (ii) the Nunatsiavut Government, (iii) the Newfoundland and Labrador Government, and (iv) the holders of mineral claims on the Nunatsiavut Government lands; and
- (c) Torngat’s statement at the second Information Session that the reason that it was proposing the roadway cross Labrador and not Quebec was that the Government of Quebec did not want the Quebec Caribou disturbed (one wonders if it is possible that

Torngat and the Quebec Government did not know that there are Caribou in Labrador also).

Y. **In Summary:**

91. JAL has significant concerns with the Torngat Proposal, in its present form. The concerns are set out in this Submission, including, but not restricted to, the concerns listed in sections 7(a) to 7(j) of this Submission.
92. If the Torngat Proposal is allowed to proceed in its present form, JAL sees a great injustice will be imposed upon each of (a) the Nunatsiavut, (b) the Nunatsiavut Government, (c) the people of Newfoundland and Labrador and (d) the Newfoundland and Labrador Government That injustice must not be allowed. The IAAC has a legal duty and obligation to prevent that injustice.
93. The injustice would be like that injustice suffered by Newfoundland and Labrador arising from the 1969 Churchill Falls Agreement between the Provinces of Quebec and Newfoundland and Labrador. The Canadian Federal Government must never allow such an injustice to occur again. As the IAAC is an agency of the Federal Government of Canada, it must never allow that injustice to be repeated.
94. The benefits to Newfoundland and Labrador must be significantly increased. And, all possible environmental damage must be severely constrained.
95. The Torngat written disclosure is inadequate. The Torngat disclosure needs to be revised in accordance with the terms of this Submission.
96. JAL believes that if the IAAC intervenes and exercises its rights and discharges its obligations owed to all Canadians, including to each of Nunatsiavut, the Nunatsiavut Government, the Newfoundland and Labrador Government and the holders of mineral claims in Labrador affected by the Torngat Proposal, many of JAL's concerns could be effectively addressed thereby benefiting each of:
 - (a) the Nunatsiavut;
 - (b) the Nunatsiavut Government;
 - (c) the other people of Newfoundland and Labrador;
 - (d) the Newfoundland and Labrador Government; and
 - (e) the holders of mineral claims over which the roadway proposed by Torngat is to traverse, including JAL.
97. JAL sees the Torngat Proposal, in its present form, provides almost little, if any, benefits to any of (a) the Nunatsiavut, (b) the Nunatsiavut Government, (c) the people of Newfoundland and Labrador, (d) the Government of Newfoundland and Labrador and (e) the holders of mineral claims in the Nunatsiavut Lands, including JAL, while at the same time providing very significant benefits to each of Torngat and the Province of Quebec. This imbalance of benefits is wrongful and unjust and must be rectified.

98. At the same time, the Torngat Proposal, in its present form, causes detriments or costs, including the detriments and costs to the environment and the harm to mineral claim holders, especially those who mineral claims that pre-date the initial proposal by Torngat, appear to borne each of (a) the Nunatsiavut, (b) the Nunatsiavut Government, (c) the people of Newfoundland and Labrador, (d) the Government of Newfoundland and Labrador and (e) the holders of mineral claims in the Nunatsiavut Lands, including JAL. This imbalance of costs is wrongful and unjust. This imbalance of costs is wrongful and unjust and must be rectified.
99. As can be clearly seen, without prior condemnation drilling on the JAL Property, not only would mineral and economic interests of JAL be severely damaged, but also the Nunatsiavut, the Nunatsiavut Government, the other peoples of Newfoundland and Labrador and the Newfoundland and Labrador Governments would be consequentially damaged as valuable employment opportunities, service provision opportunities, and taxation opportunities would be lost.
100. We will be forwarding a copy of this Submission to the Nunatsiavut and the Newfoundland and Labrador Governments, along with a covering letter as it is clear to JAL the Torngat Proposal is lop-sided and imbalanced favouring Torngat and the Quebec Government. JAL wants the Nunatsiavut Government and the Newfoundland and Labrador Government to be aware of JAL's serious concerns.
101. JAL is in a unique position as its mineral rights pre-date the Torngat initial road proposal. Further, JAL's previous exploration suggests that there is possible mineralization and possible indicators for a diamondiferous kimberlite beneath the roadway proposed by Torngat that is to cross the JAL Property.
102. JAL is asking that the IAAC reject the Torngat Proposal, in its current form, and that no approval be given until all changes suggested in this Submission are fully effected.
103. JAL is hereby committing in writing to ensure that its workforce for the condemnation drilling would include as many Nunatsiavut and other indigenous people in Newfoundland and Labrador as possible and that it would use as many Nunatsiavut and other Newfoundland and Labrador services providers as possible.
104. Once again, the IAAC must ensure that the 1969 Churchill Falls Agreement injustice is not repeated.

Z. Attachments:

105. We attach the following:
- (a) Pages 17 to 19 of the March 10, 2017 National Instrument 43-101 Technical Report, on the Strange Lake Property prepared by Micon International Ltd. for Torngat which was filed and remains filed in SEDAR+ under the "Quest Rare Minerals Ltd." profile;
 - (b) Pages 82 and 83 of the Document Number 2 – "Initial Project Description of a Designated Project" dated September 2023 found in the Government of Canada Impact Assessment Agency website located at <https://iaac-aeic.gc.ca/050/evaluations/proj/85969?culture=en-CA>;

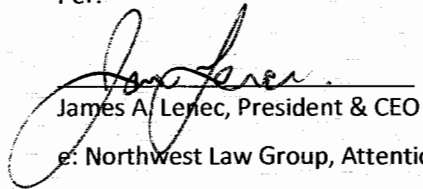
- (c) Document entitled "Geoscience Atlas" which was produced by JAL on November 29, 2023 using the website of the Geological Survey Division of the Mining and Mineral Development Branch of the Government of Newfoundland located at <https://geoatlas.gov.nl.ca/Default.htm>; and
- (d) Pages 46, 54, & 57 of the March 10, 2017 National Instrument 43-101 Technical Report, on the Strange Lake Property prepared by Micon International Ltd. for Tornгат which was filed and remains filed in SEDAR+ under the "Quest Rare Minerals Ltd." profile.

We would be more than pleased to speak with you about any and all of the above matters. Please do not hesitate to telephone Jim Lenec, the President of JAL, or send him an email at jameslenec@hotmail.com.

Yours sincerely,

JAL EXPLORATION INC.

Per:



James A. Lenec, President & CEO

c: Northwest Law Group, Attention: Alan Finlayson