LAC Minerals
2015 Annual Environmental Audit and Inspection Report

Operator:	LAC Minerals (USA) LLC, Richmond Hill Mine
Project:	Annual Environmental Audit and Inspection
DENR Inspectors:	Mike Cepak, Eric Holm, Mark Keenihan, Roberta Hudson, Jessie Allard, and Matt Hicks
Operators Present:	Todd Duex, Gene Fuller, and Mark Tieszen
Others Present:	Stan Michals, SD Game, Fish and Parks
Inspection Dates:	June 9 and 10, 2015
Time In/Out:	June 9, 2015: 11:10 am MDT to 12:15 pm MDT June 10, 2015: 10:30 am MDT to 3:30 pm MDT

The annual environmental audit and field inspection of LAC's Richmond Hill Mine site occurred on June 9 and 10, 2015. The audit meetings and field inspections for both the Homestake Mine and LAC Mine were held concurrently on both days.

On June 9, the Homestake meeting began at 9:15 am MDT, followed immediately by the LAC meeting at 11:10 am MDT. Both meetings were held at the Homestake Mine office at the Blacktail Water Treatment Plant in Central City. The field inspection for Homestake Mine took place on the afternoon of June 9 and was completed the morning of June 10. The field inspection for the LAC's Richmond Hill Mine began at 10:30 am MDT on June 10. Mike Cepak, Eric Holm, Mark Keenihan, Roberta Hudson, Jessie Allard, and Matt Hicks (DENR), Stan Michals (GF&P), and Todd Duex, Gene Fuller, and Mark Tieszen, (Barrick) participated in the LAC audit meeting, and all but Jessie Allard participated in the inspection.

Audit Meeting

Issues discussed during the audit meeting are summarized below:

1. <u>2014 Annual Performance Monitoring Report</u>: Gene Fuller presented the 2014 annual performance monitoring report. The annual reports with all associated documentation were submitted to the DENR in April 2015. LAC personnel stated it has now been 20 years since the acid drainage mitigation plan outlined in the permit amendment has been completed.

   <u>2014 Mine Pit Backfill Monitoring</u>: Monitoring results show a moderate increase in infiltration through the clay cap for the past two years. Annual precipitation at the site for 2014 was 31.58 inches, compared to 43.61 inches in 2013. Wet conditions due to a wet spring in 2013 and winter storm Atlas in October 2013 likely contributed to the increase in infiltration rates. Measurements from the barrel lysimeters show an average annual infiltration rate of 0.074 inches (5.5 GPAD), as compared to 0.04 inches in 2013 Measurements from the basin lysimeters show an infiltration rate of 0.098 inches (7.3 GPAD), as compared to 0.087 inches in 2013. This is well below the design performance target of 0.5 inch per year or 37.2 GPAD. Neutron logging and heat-dissipation unit (HDU) data continues to indicate stable trends of moisture content within and below the

clay layer. Piezometer measurements showed piezometer #2 (south) had 3.54 feet of water in 2014 compared to 6.08 feet in 2013. Piezometer #1 (west) remained dry in 2014 and has been dry since the installation of the cap. Oxygen levels measured below the cap remain under three percent, which shows the cap continues to limit oxygen. Impoundment temperature profiles remained stable. Nest #2 data logger malfunctioned in November and will be replaced. A number of temperature probes have failed over the years and will not be replaced since they operated longer than the design life.

The clay cap for the pit impoundment is performing as designed, limiting infiltration into the backfilled waste rock.

2014 Leach Pad Monitoring: Effluent from Pad 1 flowed at an average rate of 16.3 gallons per minute (gpm) for a total annual volume of 8.4 million gallons. In 2013, the rate and volume were 14.7 gpm and 7.5 million gallons. Effluent from Pad 3 flowed at an average rate of 16.5 gpm, for a total annual volume of 8.5 million gallons. In 2013, the rate and volume were 15.8 gpm and 8.1 million gallons. Trends in leach pad effluent chemistry remained stable. For Pad 1, pH in 2014 ranged from 5.1 to 5.8, and selenium values ranged from 0.023 to 0.044 mg/l. Pad 3 pH levels ranged from 6.1 to 6.8, and selenium values ranged from 0.023 to 0.033 mg/l. Compared to 2013 values, the leach pad pH and the selenium concentrations slightly decreased.

2014 Reclamation Success Monitoring: LAC discontinued vegetation monitoring in 2014 (Technical Revision #66). LAC also continued noxious weed control in 2014.

2014 Aquatic Monitoring: The data from 2014 was similar to past years and continues to show healthy aquatic communities in Cleopatra Creek and Rubicon Gulch with no evidence of impacts related to mining. Fish population surveys were performed in 2014. The population of brook trout in Cleopatra Creek ranged from 170 at site SQ-1 to 460 at SQ-3. The total number of brook trout collected in Labrador at LB-4 was relatively low at 21, and 80 were collected in Rubicon at RB-1.

2014 Water Quality: Sulfate levels in MW-9B (located to the northwest of the Pit Impoundment) increased slightly in 2014, averaging 167 mg/l compared to levels below 150 mg/l in 2013. Historically, sulfate in MW-9B steadily increased between 2006 and 2009, exceeding the 500 mg/l water quality standard from 2008 – 2009. However, since October 2009, sulfate levels in this well have declined. By 2011, the sulfate levels were below 300 mg/L and were below 200 mg/l in 2012.

MW-26 (located south of the Pit Impoundment) showed stable results. Sulfates continue to be below 500 mg/l, and pH is stable around 4.5.

Water quality in Spruce Gulch was stable in 2014, and the minimum pH at the former Waste Dump Toe has not dropped below 7.0 su since 2007. Water quality in South Gulch also remained stable. No impacts have been detected in Cleopatra Creek from the Richmond Hill Mine.

The Process Area has had some occasional selenium detected at FD-1. No other noticeable changes in water quality were noted in the process area.

2014 Water Treatment: LAC treated and discharged 29 million gallons through the Reverse Osmosis (RO) unit and Bio Plant in 2014. In addition, LAC treated and discharged 3.9 million gallons from the South Gulch collection gallery. The water balance as of June 1, 2015 was 32.1 million gallons.

2. 2014 Activities. LAC's list of 2014 activities, are as follows:

   a. Blend Pond. In 2014, the Blend Pond (old Chlorine Pond) was reclaimed. The liner was removed, the pond was backfilled and graded, and the area is now part of the Bio Plant parking lot. The blend pond was replaced by a blend tank in the water treatment plant.

   b. The sump and pipes in the passive treatment area were removed in Fall 2014.

   c. LAC submitted draft postclosure/ closure documents (Petition for Release of Reclamation Obligations, Updated Reclamation Plan and Financial Assurance, and Postclosure Plan and Financial Assurance). Initial review by the DENR was completed in Fall 2014.

3. Planned 2015 Activities.

   a. Postclosure/closure documents (Petition for Release of Reclamation Obligations, Updated Reclamation Plan and Financial Assurance, and Postclosure Plan and Financial Assurance) will be finalized. A hearing regarding the plans will be held before the Board of Minerals and Environment in Fall 2015.

   b. LAC reported that there would be no work done in the Stormwater Pond in 2015. This is the project to reline the pond.

   c. No new reclamation is planned for 2015.

4. Review of Permit Conditions: The following technical revision condition was discussed.

   April 21, 2011 Technical Revision, Sludge Disposal Condition No. 1: LAC continues to do required initial TCLP analysis on all new sludge sources, including the new Sludge Pond. One analysis was completed this year, and no issues were noted. Very little sludge is being generated. Existing sludge sources are generally analyzed annually or if there is an operational change that could cause a change in the sludge.

5. Update on Postclosure/closure documents. DENR staff reviewed a list of comments on the latest version of the postclosure/closure documents.

a. Mike Cepak said in Section 4.1.3 on page 28 in the Postclosure Plan, it mentions the over-excavation of rock in the mouth of the V-notch. He asked if this was actually done. Todd Duex said some areas of the V-Notch were over-excavated to remove pockets of sulfide material. However, the mouth of the V-Notch was under-excavated. Although the history is somewhat incomplete, it appears some areas of the V-notch were over-excavated. We decided no changes were necessary to this section of the Postclosure Plan.

b. DENR personnel expressed concerns over LAC's proposal in Section 4.1.3 of the Postclosure Plan to eliminate annual LDCRS water quality monitoring during the postclosure period. After reviewing LDCRS data trends, DENR believes that annual sampling is necessary during the postclosure period. LAC personnel said they would eliminate the proposal and continue annual LDCRS sampling.

c. Eric Holm asked LAC personnel to include more definitive language in Section 4.1.4 on page 31 of the Postclosure Plan regarding deed restriction requirements for capped areas. The current language makes it sound like DENR would only consider deed restrictions instead of require them. LAC personnel said they would change the language. Mike Cepak added that deed restriction requirements could also be addressed in a Board Order.

d. Eric Holm mentioned that in Appendix C of the Postclosure Plan, sentinel monitoring was addressed for the pit impoundment area; however, there was only minimal discussion of sentinel monitoring in the process area. LAC personnel said they would add text for the leach pad area.

e. Eric Holm also discussed resubmitting Table A2-1 in the Postclosure Plan as some of the rows were cut off. LAC personnel said they would submit a replacement table.

f. Eric Holm mentioned that in Section 3.2.23 on page 62 of the Release Petition, LAC needs to address the fate of the 1,400 cy of substrate that remains in the Passive Treatment Cell. LAC personnel said that TCLP's of the substrate passed standards, and any drainage would continue to flow down the existing spillway into the Stormwater Pond. Mr. Holm told them to include a copy of the TCLP data in the Release Petition. LAC personnel said the data would be included in a separate appendix.

g. Eric Holm asked about the road between Leach Pad 1 and 2 and Leach Pad 3 that will remain after the postclosure period. LAC personnel said the road provides access to Rubicon Gulch and needs to remain. We agreed to look at the road during the field inspection.

NOTE: Supplemental materials and replacement pages that addressed the above-mentioned items were submitted to DENR on July 14, 2015.

We also discussed the possibility of scheduling a hearing on the Release Petition, Postclosure Plan, and Updated Reclamation Plan before the Board of Minerals and Environment in September 2015. LAC personnel agreed that a September hearing would work. We also discussed the August 19, 2015 board tour of the Richmond Hill Mine.

6. Reclamation and Postclosure Bond Discussion. Regarding the bond discussions, the DENR and LAC agreed to the following items in the Postclosure bond calculation:

   a. The postclosure period will be 100 years;
   b. The inflation rate will be 3% and the discount rate will be 5%;
   c. Initial pond relining costs will be moved from the second year to the fifth year;
   d. As mentioned earlier under item 5(b), annual LDCRS monitoring costs will remain in the calculation;
   e. Aquatic monitoring will continue every other year for the first 10 years of the postclosure period. It will then be reduced to every 5 years from years 11 through 30. After year 30, aquatic monitoring will be eliminated; and
   f. WET testing will be eliminated at two sites (sites 002 and 003). WET testing will be continued quarterly at 001 and 004 to be phased out in 10 years (8 tests per year for 10 years).

   NOTE: A revised postclosure bond calculation that included the above mentioned items was submitted to DENR on July 14, 2015.

7. Weed Control. Mid-Dakota is scheduled to begin spraying weeds in July.

8. Old Sludge Pond Cover Material. LAC is evaluating various sources of cover material for the old sludge pond.

9. Update on Haul Road. LAC said there is no change in its plans for the haul road. The road will be left in place during the 100-year postclosure period for access to the water treatment plant. When water treatment is no longer necessary, LAC will remove the road and reestablish it in its original location (over the ridge to the east of Richmond Hill) unless another entity agrees to assume long term liability for it.

10. Other Topics: We further discussed LAC's proposal to reduce WET testing at the site. LAC personnel said the tests are expensive and fickle. As mentioned earlier in item 6(f), the company wants to revise its Surface Water Discharge Permit by eliminating two sites and phasing out remaining WET tests in 10 years.

The meeting portion of the audit ended at 12:15 pm MDT. At this point, we took a lunch break which ended at 12:50 pm MDT. We had a brief discussion on fish sampling in Rubicon Gulch. LAC has finished the initial three-year sampling period and wants to end fish sampling in Rubicon Gulch. No decisions were made on the proposal. The meeting ended at 12:55 pm MDT.

The group then began the Homestake audit field inspection, which continued the following morning (June 10). After the Homestake inspection ended at around 10:00 am MDT, the group proceeded to the Richmond Hill Mine for the LAC audit field inspection. We arrived at the LAC gate at 10:30 am MDT.

Field Inspection

Access Road. While driving along the access road north of Wharf Resources, we noticed a couple of new residences/cabins being constructed. In 2014, we counted eight residences or cabins along this road. It should be noted that all of these residences or cabins were built after LAC constructed the road in 1988.

Upper Spruce Gulch. The first stop on the field inspection was the Spruce Gulch area along the south side of the former waste depository at 10:34 am MDT. The group walked down from the access road on the south ridge of the old depository to the "sawdust" area (an area where sawdust was stockpile during the early stages of reclamation, the sawdust inhibited revegetation for several years).

Vegetative cover in Spruce Gulch is now in its twentieth growing season and continues to be very good to excellent. No new erosion was noted. LAC established four vegetation transects in Spruce Gulch (SG#1, SG#2, SG#3, and SG#4) and collected data in 1997, 1998, 1999, 2000, 2005, 2010, and 2013. Cedar Creek Associates also collected vegetation data in 2008. The overall average of 65 percent live cover for the monitoring period exceeds the 40 percent cover standard established for the mine site.

Average live vegetative cover in the area evaluated was estimated at 65 percent which is close to the overall average and above the 40 percent cover standard. Grasses and legumes present that are part of the approved seed mix include timothy, Kentucky bluegrass, smooth bromegrass, western wheatgrass, hard fescue, and blue flax. Other species noted include black medic, assorted vetches, moss, and yarrow. Hard fescue and Kentucky bluegrass were the dominant species. Noxious and other weeds noted include St. John's wort, Canada thistle, 'and dandelion. Several St. John's wort and Canada thistle plants were pulled during the inspection. Even though there is no infestation, LAC needs to continue spraying St. John's wort and canada thistle to keep it under control.

LAC collected containerized tree and shrub survival data from 1997 through 2001, 2003, 2005, 2007, 2009, 2010, 2012, and 2013. Cedar Creek Associates also collected tree and shrub data in 2008. For containerized plantings, LAC established a belt transect in each of the birch, spruce, transition, and oak-aspen zones. Survival rates for all of the zones combined during the monitoring period range from a low of 48 percent in 2007 to a high of 98 percent in 1997. Survival rates have stabilized to around 50 to 55 percent since the 2007 sampling period.

In the shrub seeded areas, LAC established a macroplot in the birch zone. LAC collected data from this macroplot from 1996 through 2001, 2003, 2005, 2007, 2009, 2010, 2012, and 2013. Total shrubs per acre in the macroplot during the seventeen year monitoring period varied from a low of zero in 2009 to a high of 75 in 1996. In 2012 and 2013, two shrubs were noted.

Trees and shrubs noted during the inspection include currant, willows, ceanothus, serviceberry, juniper, aspen, birch, ponderosa pine, bur oak, Black Hills spruce, chokecherry, woods rose, snowberry, silver buffaloberry, and kinickinick. All trees and shrubs appear to be healthy and well established. However, we noted several dead woods rose in the area. Todd Duex said the company's vegetation consultant felt that woods rose was becoming too prevalent, so he decided to spray some of the woods rose to get it under control.

Photo 1. Spruce Gulch vegetation.

Photo 2. View to northwest across former waste rock facility in Spruce Gulch toward the pit impoundment.

Spruce Gulch Water Management Facility (Ponds). We arrived at the Spruce Gulch ponds at 11:00 am MDT. The Retention Pond had 6 to 8 feet of freeboard. Todd Duex stated that the cost for caustic for the Spruce Gulch Water Management Facility is $2,000 per year.

Photo 3. Retention Pond in Spruce Gulch.

Pit Impoundment. The inspection group arrived at the top of the Pit Impoundment at 11:25 am MDT. Vegetative cover on the pit impoundment is now in its twentieth growing season and continues to be very good to excellent. No new erosion was noted. LAC established four vegetation transects on the pit impoundment (PI#1, PI#2, PI#3, and PI#4) and collected data from 1998 through 2013. The overall live coverage average of 57 percent for the 17 year monitoring period exceeds the 40 percent cover standard established for the mine site.

Average live vegetative cover was estimated at 55 percent which is close to the overall average and above the 40 percent cover standard. Grasses and legumes present that are part of the approved seed mix include Kentucky bluegrass, smooth brome, western wheatgrass, hard fescue, and white Dutch clover. Other species present include black medic, goatsbeard, and yarrow. No noxious or other weeds were present.

As the inspectors walked around the pit impoundment, they uprooted several small pine and birch trees and a large ceanothus bush. The company needs to continue to remove pine trees, ceanothus, and other trees and shrubs from the impoundment.

Photo 4. Pit Impoundment.

Turnaround Area. We arrived at the Turnaround area at 11:44 am MDT.

The area is in its twenty-fourth growing season. LAC established two vegetation transects in this area, TA#1 and TA#2, and collected data in 1997, 1998, 1999, 2000, 2005, 2010, and 2013. Cedar Creek Associates also collected vegetation data in 2008. The overall live cover average of the two transects for the monitoring period is 54 percent and meets the 40 percent cover standard established for the mine site.

Average live vegetative cover in the area evaluated was estimated at 60 percent which is above the overall average and the 40 percent cover standard. Grasses and legumes present that are part of the approved seed mix include timothy, Kentucky bluegrass, western wheatgrass, hard fescue, white Dutch clover, and blue flax. Other species noted include black medic, oxeye daisy, assorted vetches, moss, and yarrow. Hard fescue was the dominant species. Noxious and other weeds noted included St. John's wort. Even though there is no infestation, LAC will need to continue to spray St. John's wort to keep it under control.

The area has become a mixed ponderosa pine forest. Trees and shrubs noted include ponderosa pine, Black Hills spruce, aspen, birch, serviceberry, juniper, snowberry, and kinickinick. We noted additional mortalities to small pine trees since the last inspection which were likely killed by bark beetles ("ips"). For the most part the dead trees ranged from 8 to 12 feet in height. LAC has not collected any tree and shrub data in this area.

Photo 5. Turnaround Pit Area, showing pine trees killed by bark beetles.

At this point, we took a lunch break at 12:15 pm MDT at the Water Treatment Building. The inspection resumed at 12:45 pm MDT.

<u>Leach Pad 1 and 2</u>. At 12:55 pm MDT, we walked from the north corner of the Pad 1 impoundment up the storm runoff ditch to the first bench and walked the bench to the southwest over to Pad 2. Vegetative cover on Leach Pad 1 and 2 is now in its nineteenth growing season and continues to be very good to excellent. No new erosion was noted. LAC Minerals established two vegetative transects in this area (Pad1-#1 and Pad1-#4) and collected vegetation

data for each transect from 1997 through 2013. Cedar Creek Associates also collected vegetation data in 2008. The overall live cover average of the two transects for the monitoring period is 65 percent and meets the 40 percent cover standard established for the mine site.

The vegetative cover noted during the inspection averaged around 65 percent which is close to the overall average and above the 40 percent standard. Grasses and legumes present that are part of the approved seed mix include timothy, Kentucky bluegrass, smooth bromegrass, western wheatgrass, hard fescue, and white Dutch clover. Other species noted include black medic, assorted vetches, moss, and yarrow. Smooth bromegrass and hard fescue were the dominant species. Noxious or other weeds noted include St. John's wort. Even though there is no infestation, LAC will need to continue to spray St. John's wort to keep it under control.

As the inspectors walked around the pad impoundment slopes, they uprooted several small pine trees and an aspen tree. LAC needs to continue to remove pine trees and other trees and shrubs from the pad impoundment.

Photo 6. Pad 1 and 2 northwest slope.

Photo 7. View from Pad 2 north toward process ponds and water treatment plant.

New Sludge Pond. As we walked back to the Water Treatment Building, we noted some of the geotextile on the New Sludge Pond was torn. LAC personnel said they are planning to replace the geotextile.

Selenium Passive Treatment Cell. At 1:35 pm MDT, we visited the Passive Treatment Cell. LAC's consultants Cedar Creek Associates and Bar XX Environmental did not collect any vegetative data for the Passive Treatment Cell. However, the vegetative cover noted during the inspections averaged around 65 percent which is above the 40 percent standard. Overall litter cover was estimated around 15 percent. Grasses and legumes present that are part of the approved seed mix include timothy, Kentucky bluegrass, smooth bromegrass, western wheatgrass, and blue flax. Other species noted include black medic and yarrow. There were no dominant species on the reclaimed area. Noxious and other weeds noted include tansy, Canada thistle, and dandelion. No infestations were noted, but tansy and Canada thistle will need to be sprayed during the postclosure period to keep the species under control. No erosion was noted in the Passive Treatment area.

During the June 24, 2014 inspection, we noted remaining PVC ventilation pipes and distribution system piping still needed to be removed. After the inspection, LAC personnel removed the piping system with little impact to the vegetation. During this year's inspection, we noted the pipes have been removed. We also noted the discharge pipe and lined spillway from the cell to the Stormwater Pond. As mentioned during the meeting, even though the substrate meets TCLP standards, LAC has elected to keep the discharge pipe and spillway during the postclosure period

to facilitate the management of any discharge from the cell and any effluent monitoring that may be warranted in the future.

Photo 8. Selenium Passive Treatment Area vegetation.

Photo 9. Discharge line from Selenium Passive Treatment into Stormwater Pond.

Pad 3. At 1:50 pm MDT we arrived at the south corner of Pad 3. From here, several of the group walked up to the top of the impoundment.

Vegetative cover on Leach Pad 3 is now in its nineteenth growing season and continues to be very good to excellent. No new erosion was noted. LAC Minerals established two vegetative transects in this area (Pad3-#2 and Pad3-#3) and collected vegetation data for each transect from 1997 through 2013. Cedar Creek Associates also collected vegetation data in 2008. The overall live cover average of the two transects for the monitoring period is 62 percent and meets the 40 percent cover standard established for the mine site.

The vegetative cover noted during the inspection averaged around 65 percent which is close to the overall average and above the 40 percent standard. Grasses and legumes present that are part of the approved seed mix include Kentucky bluegrass, smooth bromegrass, slender, western, and thickspike wheatgrass, hard fescue, white Dutch clover, rocky mountain penstemon, and blue flax. Other species noted include black medic, assorted vetches, moss, and yarrow. Smooth bromegrass and hard fescue were the dominant species. Noxious or other weeds noted include St. John's wort and dandelion. Even though there is no infestation, LAC will need to continue to spray St. John's wort to keep it under control.

No trees or shrubs were noted on the impoundment.

Photo 10. Vegetation on top of the Pad 3 impoundment.

Photo 11. View of the V-notch area looking southwest from Pad 3.

Old Sludge Pond. At 2:10 pm MDT the group drove up to the Old Sludge Pond. There was no change since the previous year. LAC still plans to place a soil cover over the sludge during final reclamation sometime in the next five years.

Water Treatment Plant (WTP). We entered the WTP at 2:15 pm MDT. A permanent area has been set up for the Nalco additive (assists the removal of selenium). A blend tank was added inside the building replacing the old blend pond (former chlorine pond) that was removed in 2014. Todd Duex showed the group the heat exchangers used to maintain water at optimal temperatures. The heat exchangers only have a 4 degree temperature loss during exchange. Mr. Duex showed the heated storage chamber for molasses (bacteria food). The heated molasses helps maintain treatment temperatures.

Mr. Duex reviewed the treatment process in the plant. First the water is passed through the multimedia filters, then it is passed through the reverse osmosis (RO) unit. A portion of the brine from the RO unit is sent to the bioreactors for selenium removal, the remainder is recirculated back to the ponds. The water treatment plant removes 75% of the selenium and the addition of the Nalco product removes an additional 12.5% (total reduction of 87.5%). After treatment in the anaerobic and aerobic bioreactor units, the treated brine flows from the biological circuit to the blend tank where it is mixed with RO permeate and discharged to Rubicon Gulch (Outfall 004).

Photo 12. Interior of water treatment plant.

The field portion of the LAC audit ended at 2:45 pm MDT. We returned to the Homestake office in Central City via the Maitland area. On the drive back to the office, we noted sediment from subdivision roadwork did not seem to be as bad as noted in 2014.

After the inspection, we returned to the Central City office at 3:30 pm MDT. Since there were no additional items to discuss, a close-out meeting was not necessary.

Comments/Recommendations

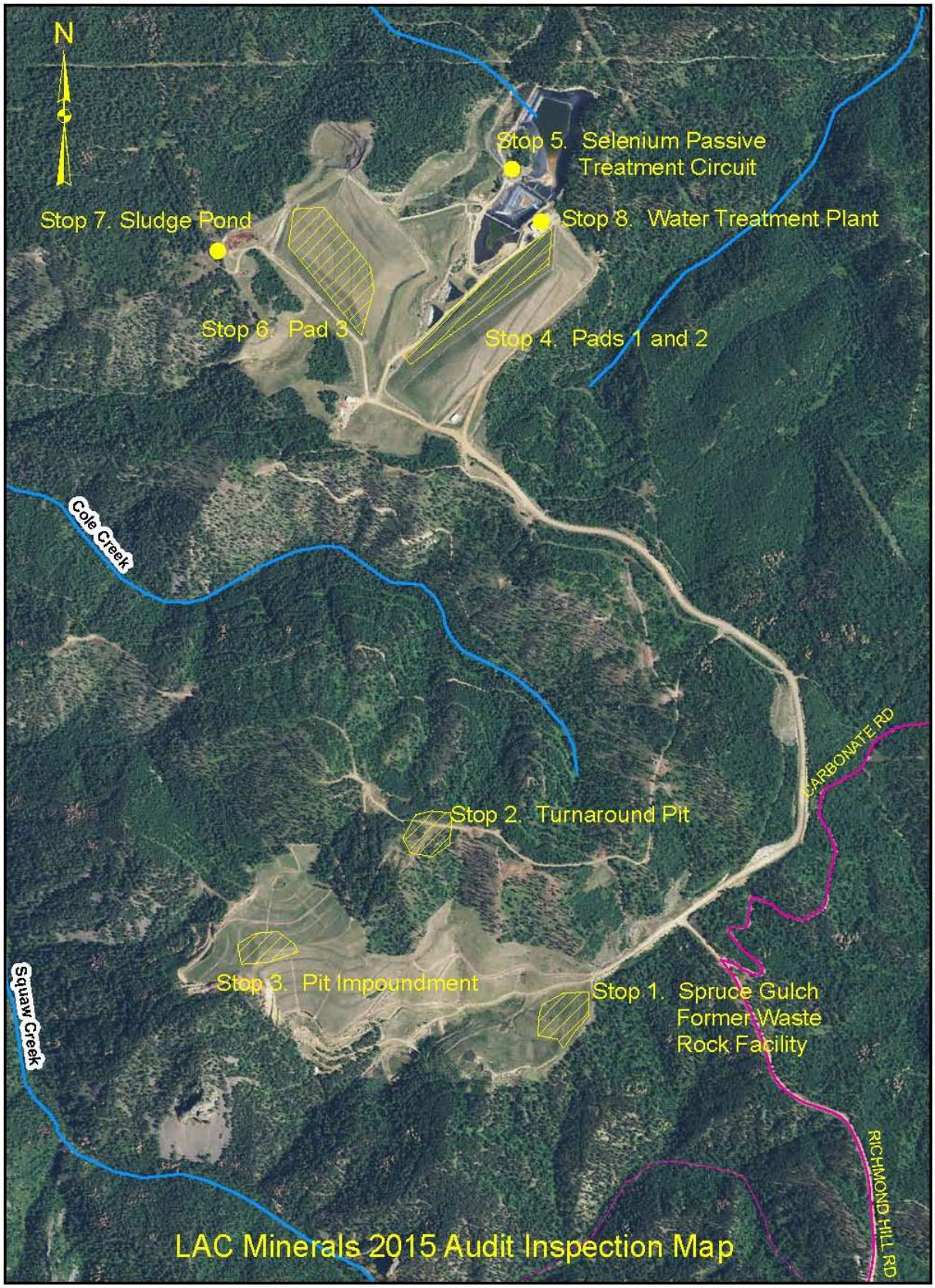
1. LAC continues to do a very good job of reclamation and site-wide environmental management. LAC has been innovative in its approach to water treatment technology.

2. LAC needs to continue spraying St. John's wort, spotted knapweed, and other noxious weeds in areas covered by the mine permit.

3. LAC needs to continue removing pine trees, ceanothus, and other deep rooting vegetation from the pit impoundment and leach pad areas of the mine.

Inspectors:_____\x/_____

Date: September 1, 2015_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Stop 5. Selenium Passive Treatment Circuit
Stop 7. Sludge Pond
Stop 8. Water Treatment Plant
Stop 6. Pad 3
Stop 4. Pads 1 and 2
Cole Creek
CARBONATE RD
Stop 2. Turnaround Pit
Stop 3. Pit Impoundment
Stop 1. Spruce Gulch Former Waste Rock Facility
Squaw Creek
RICHMOND HILL RD
LAC Minerals 2015 Audit Inspection Map