

#### **REPORT**

# Response to CIRNAC on Progressive Reclamation Cost Update

Lupin Mine, Nunavut

Submitted to:

# **Lupin Mines Incorporated**

c/o Mandalay Resources Corporation Suite 330, 76 Richmond Street Toronto, ON

Submitted by:

#### Golder Associates Ltd.

16820 107 Avenue Edmonton, Alberta, T5P 4C3 Canada
+1 780 483 3499
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#### **APPENDIX A**

Updated Estimate of Progressive Reclamation Credit

### **APPENDIX B**

Work Plan for Winter 2018 - 2019



# 1.0 INTRODUCTION

Golder Associates Ltd. (Golder) was retained by Lupin Mines Incorporated (LMI) to update the closure cost estimate for the Lupin Gold Mine located in Nunavut.

#### 2.0 BACKGROUND

LMI is currently applying to the Nunavut Water Board (NWB) for a renewal of their Water Licence (2AM-LUP1520). Lupin intends to carry out final closure of the Site and submitted a Final Closure and Reclamation Plan (FCRP) (Golder, 2018a) on July 30, 2018. A cost estimate to implement final closure of the Site is appended to the FCRP. The FCRP and the associated cost estimate are currently in the permitting process and have not yet been approved.

In the meantime, LMI is continuing to carry out progressive reclamation works consistent with the existing Water Licence and the Interim Closure and Reclamation Plan (ICRP, approved July 20, 2018). LMI is planning to continue progressive reclamation work throughout the winter of 2018 - 2019.

On 24 September 2018, LMI submitted a report (Golder, 2018b) which documented the progressive reclamation work that had been completed as of July 5, 2018, as well as the work that is planned to be completed during the winter of 2018 – 2019. The report (referred to herein as the Progressive Reclamation Cost Update, or PRCU) also provides estimates of the amounts by which the closure financial liability had been reduced by July 5, 2018 and will be reduced by the end of the winter of 2018 – 2019. This information was provided in response to an e-mail request (NWB, 2018c) from NWB to LMI.

Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC) provided a response to the PRCU in a letter (CIRNAC, 2018). The following sections of the current report provides responses to the CIRNAC (2018) letter. The CIRNAC comments are reproduced in boldface italic, followed by LMI responses in plain font.

#### 3.0 RESPONSES TO CIRNAC COMMENTS

#### 3.1 Recommendation 1:

LMI should provide CIRNAC with the FCRP and the final schedule / timelines and revised cost estimate in keeping with the FINAL CP. Not having this information at this time, limits our assessing the PRCU based on our numbers from earlier closure plans reviews.

It is important to note that the FCRP and the associated cost estimate are currently in the permitting process and that they have not been approved. As a result, the FCRP cost estimate cannot currently form the basis for evaluation of the value of progressive reclamation work completed.

The FCRP document (Golder, 2018a) was submitted to the Nunavut Water Board on July 20, 2018. The full documentation is publicly available on the NWB ftp site at:

ftp://ftp.nwb-oen.ca/registry/2%20MINING%20MILLING/2A/2AM%20-%20Mining/2AM-LUP1520%20LMI/1%20APPLICATION/2018%20Amendment/180727%202AM-LUP1520%205\_0\_Final\_Closure\_Reclamation\_Plan%20Ver.0-IMLE.pdf

The RECLAIM cost estimate, which forms Appendix G to the FCRP document is also available on the NWB ftp site at:

ftp://ftp.nwb-oen.ca/registry/2%20MINING%20MILLING/2A/2AM%20-%20Mining/2AM-LUP1520%20LMI/1%20APPLICATION/2018%20Amendment/180727%202AM-LUP1520%205 G%20Reclaim Cost Estimate-IMLE.pdf

#### 3.2 Recommendation 2:

In general, LMI should provide additional information that will allow us to:

- verify the work as stated Section 2.3 of the PRCU has been performed,
- confirm that the work has been carried out in accordance with the design specification and in accordance with the Final Closure Plan, and
- confirm that works completed and/or planned are consistent with the Final Closure Reclamation Plan.

Documentation of the completion of the listed PRCU work is provided below in Section 3.4. The works completed and/or planned are being implemented in accordance with the currently approved ICRP. That said, the PRCU works are also in all respects consistent with the work program outlined in the FCRP. (It is possible to compare each of the specific items listed in Section 2.3 of the PRCU report directly to line items listed in the FCRP in Table 14: "Summary of Measures for Final Closure".)

#### 3.3 Comments on Section 1

Comment: It is not clear if this is the same plan as the Interim Closure Restoration Plan (ICRP) dated October 2017.

Recommend: LMI clarify if IARP and ICRP are the same, or if not note the difference.

In October of 2017, when LMI submitted the update to the previous Interim Abandonment and Reclamation Plan (IARP), they retitled the updated document as an "Interim Closure and Reclamation Plan". This decision was meant to reinforce that LMI intended to properly "close" Lupin Mine rather than to "abandon" it. This is also in keeping with CIRNAC's change in terminology from 'abandonment' to 'closure' in their policy and guidelines. It is noted that subsequent correspondence from the Nunavut Water Board continues to use the older IARP term. For current purposes IARP and ICRP refer to the same document.

Section 1.0 is indicating that the ongoing progressive reclamation work is being carried out in accordance with the latest approved version of the Interim Closure and Reclamation Plan (ICRP). For clarity, the latest approved version is the ICRP document dated October 2017. This document was reviewed and accepted by CIRNAC in a letter dated May 18, 2018. The ICRP was approved by NWB on July 20, 2018

ftp://ftp.nwb-oen.ca/registry/2%20MINING%20MILLING/2A/2AM%20-%20Mining/2AM-LUP1520%20LMI/3%20TECH/10%20A%20and%20R%20%28I%29/2018/180720%202AM-LUP1520%20ICRP%20Approval-OLAE.pdf)

#### 3.4 Comments on Section 2

Comment: As stated in section 2.1 it is noted that the progressive cost estimate is based on the KP cost estimate, not the Final Closure Plan Cost estimate.

Recommend: LMI identify differences between the KP and Final Closure Plan Cost estimate.

The progressive cost estimate is not and cannot be based on the FCRP cost estimate because it has not been approved. The progressive cost estimate needs to be compared to the KP (2016) cost estimate because that is the estimate that has been approved by NWB and accepted by CIRNAC. The KP estimate, which has previously been reviewed, amended within the Licence by NWB as Amendment No. 2 (NWB, 2018), is the current estimate and determined the amount of reclamation security that is currently being held for the Lupin Mine site (i.e., \$29,305.00).

Comment: Note that a significant portion of the reduction was related to the usability of the fuel. Since the usability of fuel on site has already been accounted for in the last security reduction, it is not clear to CIRNAC if a further reduction in security includes fuel.

Recommend: LMI provide value of progressive reclamation reduction not including value of fuel, since it has already been accounted for in an earlier reduction

Amendment No. 2 (NWB, 2018) reduced the amount of the reclamation security by \$5.345 M from \$34.65 M to \$29.305 M, and the recognition of the usability of the fuel on the site accounted for \$2.770352 M of that reduction. The calculation of the incremental progressive reclamation amount in Appendix A to the PRCU report (Golder, 2018b) explicitly shows and deducts the amount of Amendment No. 2 from all calculations. For example, the progressive reclamation completed as of July 5, 2018 is valued at \$8.430855 M. Deducting the Amendment No. 2 amount of \$5.345 M leaves an incremental reduction of \$3.085855 M. The latter amount does not include the fuel, or any other credit associated with Amendment No. 2.

Comment: During the site visit LMI was in the process of preparing for lime treatment, but treatment had not started.

Recommendation: Confirm when in 2018 the lime treatment and discharge started and ended at the site.

Field records indicate that treated water was discharged from Pond 2 between August 21 and September 19, 2018. Further details are provided in the responses below.

Comment: Golder states that the numbers presented have been "reviewed for reasonableness" but otherwise Golder has relied on what they call "information". No verification or supporting information has been provided to confirm that these activities and quantities as stated have been completed or that they are in accordance with the ICRP or FRCP.

Recommend: LMI should provide verification of information.

Documentation for the listed items is provided below:

In accordance with the ICRP and approved Tailings Containment Area Closure Plan presented in the FRCP, exposed tailings areas in Cell 5 continued to be covered with esker material during the 2018 season. Field records summarized in Table 1 indicate that an additional 19,385.75 m³ of esker material



was hauled to Cell 5 between July 6 and October 18, 2018 and was placed over tailings to achieve a minimum 1m thickness;

- In accordance with the plans outlined in the ICRP and the March 2013 Care and Maintenance Plan "Lupin Mine Liquid Waste Management Plan" and following Metal Mining Effluent Regulations (MMER) and requirements stated in the Lupin NWB Water License 2AM-LUP1520, 2,004,295 m³ of treated water was discharged from Lupin TCA Pond 2 in 2018. Flow meter and daily discharge records, presented in Table 2, indicate that this volume of water was discharged between August 22 and September 19, 2018. This activity lowered the Pond 2 water level by approximately 2.0 m. The quality of the water was monitored and analyzed as per Licence requirements and will be reported in the 2018 Annual Report to be submitted to the NWB prior to March 31, 2109.:
- As part of the planned activities outlined in the ICRP, a total of 4,000 m of tailings pipeline was removed, in accordance with procedures outlined in the approved 2013 Care and Maintenance Plan and its associated Lupin Mine Waste Management Plan (Solid and Hazardous);
- As part of the planned activities outlined in the ICRP, approximately 3,000 m of power cable between the TCA and the former Explosives Plant has been removed in accordance with procedures outlined in the approved 2013 Care and Maintenance Plan and its associated Lupin Mine Waste Management Plan (Solid and Hazardous. The power cables are currently coiled in the cable laydown area located adjacent to the boneyard and are awaiting landfill disposal as per the current Lupin Mine Waste Management Plan (Solid and Hazardous);
- The generator has been removed from the Freshwater pumphouse and is currently being used to power the equipment shop. It will remain on site for use during closure activities and then will be salvaged if usable/economical or disposed on site as per the Lupin Mine Waste Management Plan (Solid and Hazardous);
- There are number of existing thermistors installed within the Lupin TCA dams and cells to monitor dam and esker cover performance. The dam thermistors are read annually during geotechnical inspection, along with cover thermistors where feasible, and thermistor monitoring results are outlined in the annual geotechnical inspection reports. In August 2018, additional instrumentation was installed and consisted of two strings of soil moisture, temperature and conductivity sensors with dataloggers installed in the TCA cells 2 and 3. Each string consists of 5 sensors spaced 0.2m apart installed between 0.5m to 1.5m below the esker cover surface. They were installed by the Lupin TCA Engineer of Record and data will be download annually during TCA geotechnical inspections and reported with the thermistor results;
- In August 2018, a total of 26 fuel storage tanks have been cleaned and certified by a Nunavut Registered Mechanical Engineer to be gas free and suitable for demolition. Certification records for each tank are located at site;
- A fleet of equipment at Ulu Mine has been evaluated and is now being serviced in preparation for potential shipment back to Lupin during the winter of 2018 – 2019; and
- Records indicate that approximately 21.8 tonnes (48,000 pounds) of hazardous waste material was removed from the site during the summer of 2018. This item has been added to the updated PRCU.



Comment: CIRNAC understands this section of the document to suggest that all of the work listed will be completed in the winter 2018-2019. Based on our understanding of the site and work elements, we need LMI to provide more information on how these tasks will be completed in the timeline suggested.

On review of the Estimate of Progressive Reclamation Reimbursement cost tables in Appendix A, we noted that not all of the work identified in Section 2.3 Progressive Reclamation Planned for the Winter 2018-2019 was actually being costed as being completed (100%) in winter 2018-2019 as the tables provided indicate 15% is expected to be performed during the period.

The work towards building removal planned for the winter of 2018 – 2019 comprises gutting of removable materials. The remaining building removal work will be completed later by a demolition Contractor. The value of the gutting is estimated to represent 15% progress towards the overall value of the demolition. It is noted that the remaining allowance for the future demolition work is 85% of \$128/m² or \$108.80/m². This is still significantly higher than the high value in RECLAIM7of \$65/m², so ample security remains for the completion of the demolition work.

Recommend: CIRNAC would request that LMI be more specific and clarify what and how much work is actually planned to be performed in the winter of 2018-2019 against the bulleted general line descriptions listed in Section 2.3. As well as providing more information on how these tasks will be completed in the timeline provided.

Appendix B to this report provides an itemized plan for work to be conducted during the winter of 2018 – 2019.

#### 4.0 RESPONSES TO ATTACHMENT B

Attachment B to CIRNAC (2018) contains 11 points.

Points 1 through 6 appear to provide comments on the FCRP document (Golder, 2018a). These comments are constructive and will be addressed during the process of approvals for the FCRP and the Water Licence amendment and renewal. They are not however material to the PRCU calculation.

Points 7 through 11 are addressed below.

7. Major earthwork stabilization addition at M Dam was carried out through the placement of esker materials, not rip rap. Esker materials do not appear to be at 2:1 slope and are slumping. Add rip rap cover to outer shell.

The progressive reclamation tension crack earthwork stabilization work at M Dam was completed in 2016 through the placement of an esker material reinforcement buttress and crest surface backfill, as prescribed by the TCA Engineer of Record (EOR). This work was inspected in 2017 by the EOR who noted "Maintenance and repair of the tension cracks were completed on Dam M"; with details included in the quoted publicly available "2017 Lupin Mine Tailings Containment Area Geotechnical Inspection" report (Norwest 2017). This completed and inspected work is what contributed to the M Dam PRCU calculation.

At closure, a dozer will be used to re-slope the existing materials used to construct the above described buttress, to a minimum of 2:1 and up to 2.5:1 as directed by the EOR. The existing esker materials will be used for the re-slope in addition to the existing rip-rap, which will be salvaged and replaced on the flattened slope. After the adjustment in the PRCU, there remains an allowance of \$152,000, which is ample to complete this remaining work.



8. The ICRP in Section 6.5.3 page 41 states that "a major program of dam enhancement is planned during closure activities. The sides of all dams will be brought to 2.5H:1V slope by the addition of quarried rip rap". Section 6.10 notes that "a riprap quarry will be developed to provide the coarse (nonPAG) broken rock needed to enhance dam stability and provide additional armour for the faces of the dams...". Field comments during the site visit stated that there were no plans to quarry rock. This is a material change of design and will reduce the long term stability and erosion resistance of the embankments. See also issue 9 below. This is a material change that should likely not be accepted. If proceeding with this course of action it is likely that some form of long-term maintenance will be required.

It is correct that plans have changed between the ICRP and the FCRP; however the changes do not apply to the completed work described above, since it was completed as Dam M progressive reclamation work. At closure, as described in the FCRP, rip-rap salvaged from higher elevations will be placed along the toes of the re-sloped dams where they will be exposed to wave action, and only if the rip rap currently in those areas is deemed inadequate. The dams will be re-sloped as per the direction of the EOR and there are no plans to use rip rap as general fill to flatten the slopes.

9. In ICRP closure costing LMI noted that Rip Rap costs should use actual costs as incurred in M Dam work. However, based on field observations, M Dam work as noted above was carried out using esker material not rip rap materials and do not appear to be at 2.5:1 slope.

See response to 7 and 8 above. To the extent that rip rap is required, it will be salvaged from areas that are above the final closure water level rather than producing new material from a quarry. The unit cost will be lower than the \$15.20/m³ that is currently in the security estimate. Nonetheless, this unit cost has not been changed in the PRCU.

10. Temporary portal plug exists on site. Draft closure plan does not include for an engineered plug for the portal. Need to include for engineered design and construction of permanent portal plug.

The final FCRP will include plans and a cost allowance for construction of a permanent plug in the portal entrance.

11. The ICRP in Section 6.4 indicated that waste rock will either be excavated and placed underground/or in the TCA; or left in place contoured and covered. The final draft closure plan presents a material change in waste rock management as it is now proposed to consolidate most of the waste rock in place at the mill site and cover with esker materials. PAG waste rock should be placed U/G as much as possible. We are concerned that the proposed cover will only act as an intrusion barrier and not prevent flushing of acid seeps. The proponent needs to demonstrate how placement of an esker cover over contoured waste rock will mitigate surface drainage of acidic water.

It is correct that the strategy for managing waste rock has been changed from the ICRP to the FCRP. This will be discussed during the approvals process. In the meantime, no adjustment has been made in the PRCU; the allowance remains unchanged at \$2.8 M.

# 5.0 UPDATED COSTS

The spreadsheet in Appendix A provides calculations of the following:

■ The value of the progressive reclamation work that had been completed as of the site visit of July 5, 2018, (bordered in yellow) and

■ The value of the progressive reclamation work that is planned to be completed over the winter of 2018 – 2019.

In both cases, the values were calculated with specific correspondence to the items, quantities and unit costs used in the estimate of KP (2016). The items (totalling \$5,345,000) that were included in the security reduction under Amendment No. 2 are identified separately. The incremental reduction in security (over and above Amendment No. 2) that was in place as of July 5, 2018 is estimated at \$3,085,855. The incremental reduction in security that will be in place as of the end of the winter of 2018 – 2019 is now estimated at \$6,156,531. The latter number has been adjusted slightly downwards from the estimate of September 24, 2018 in Golder (2018b). The adjustment reflects field measured quantities discussed in Section 3.4 of this report.

#### 6.0 CLOSURE

We trust this report adequately addresses the questions raised by CIRNAC in response to the PRU. If you have any questions on this report, please do not hesitate to contact us.

Golder Associates Ltd.

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Ken Bocking, P.Eng. *Principal* 

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#### REFERENCES

Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC) (2018), "2AM-LUP1520 – Review of Progressive Reclamation Cost update – Lupin Mine Property - Kitikmeot Region, Nunavut", Letter to NWB, November 2, 2018.

- Golder Associates Ltd., (2018a), "Lupin Mine Site, Final Closure and Reclamation Plan", Report No. 1789942\_003\_RPT\_Rev0, July 2018.
- Golder Associates Ltd., (2018b), "Progressive Reclamation Cost Update, Lupin Mine, Nunavut", Report No. 1789942 004 RPT Rev0, September 24, 2018.
- Knight-Piesold Ltd., (KP, 2016), Third Party Technical Review of Reclamation Security Estimates for the Lupin Gold mine, Nunavut, December 6, 2016.
- Norwest Corporation, (2017), "2017 Lupin Mine Tailings Containment Area Geotechnical Inspection", September 24, 2017.
- Nunavut Water Board, (NWB, 2018a), Licence No. 2AM-LUP1520, Type "A" Amendment No. 2, April 18, 2018.
- Nunavut Water Board, (2018b), "Licence No. 2AM-LUP1520 Nunavut Water Board (NWB) Decision Regarding Request of Lupin Mines Incorporated (LMI) to Amend the Amount of Security Held under Part C, Item 1 of the Licence and further NWB Guidance regarding the Approval of the *Interim Abandonment and Restoration Plan* and *Closure Cost Estimate* under the Licence, Part C, Item 4 and Part I, Item 2", April 18, 2018.
- Nunavut Water Board, (NWB, 2018c), E-mail from NWB (Karen Kharatyan) to LMI (Karyn Lewis), September 13, 2018.



Table 1: Field Records of 2018 Fill Placement in Cell 5 TCA

Date	Truck Load Count	Esker Volume Hauled from Fingers Pit (m³)	Esker Volume Placed in Cell 5 (m³)	Total Volume Placed in Cell 5 (m³)
06-Jul-18	2	13.5	13.5	13.5
07-Jul-18	15	101.25	101.25	114.75
08-Jul-18	15	101.25	101.25	216
09-Jul-18	15	101.25	101.25	317.25
10-Jul-18	6	40.5	40.5	357.75
11-Jul-18	18	121.5	121.5	479.25
12-Jul-18	18	121.5	121.5	600.75
13-Jul-18	17	114.75	114.75	715.5
14-Jul-18	20	135	135	850.5
15-Jul-18	34	229.5	229.5	1080
16-Jul-18	42	283.5	283.5	1363.5
17-Jul-18	46	310.5	310.5	1674
18-Jul-18	46	310.5	310.5	1984.5
19-Jul-18	46	310.5	310.5	2295
20-Jul-18	47	317.25	317.25	2612.25
21-Jul-18	24	162	162	2774.25
22-Jul-18	41	276.75	276.75	3051
23-Jul-18	37	249.75	249.75	3300.75
24-Jul-18	5	33.75	33.75	3334.5
25-Jul-18	0	0	0	3334.5
26-Jul-18	0	0	0	3334.5
27-Jul-18	0	0	0	3334.5
28-Jul-18	0	0	0	3334.5
29-Jul-18	0	0	0	3334.5
30-Jul-18	0	0	0	3334.5
31-Jul-18	0	0	0	3334.5
01-Aug-18	0	0	0	3334.5
02-Aug-18	0	0	0	3334.5



Date	Truck Load Count	Esker Volume Hauled from Fingers Pit (m³)	Esker Volume Placed in Cell 5 (m³)	Total Volume Placed in Cell 5 (m³)
03-Aug-18	0	0	0	3334.5
04-Aug-18	0	0	0	3334.5
05-Aug-18	0	0	0	3334.5
06-Aug-18	0	0	0	3334.5
07-Aug-18	0	0	0	3334.5
08-Aug-18	0	0	0	3334.5
09-Aug-18	0	0	0	3334.5
10-Aug-18	18	121.5	121.5	3456
11-Aug-18	26	175.5	175.5	3631.5
12-Aug-18	33	222.75	222.75	3854.25
13-Aug-18	39	263.25	263.25	4117.5
14-Aug-18	36	243	243	4360.5
15-Aug-18	39	263.25	263.25	4623.75
16-Aug-18	42	283.5	283.5	4907.25
17-Aug-18	40	270	270	5177.25
18-Aug-18	41	276.75	276.75	5454
19-Aug-18	40	270	270	5724
20-Aug-18	43	290.25	290.25	6014.25
21-Aug-18	39	263.25	263.25	6277.5
22-Aug-18	43	290.25	290.25	6567.75
23-Aug-18	42	283.5	283.5	6851.25
24-Aug-18	34	229.5	229.5	7080.75
25-Aug-18	38	256.5	256.5	7337.25
26-Aug-18	39	263.25	263.25	7600.5
27-Aug-18	49	330.75	330.75	7931.25
28-Aug-18	50	337.5	337.5	8268.75
29-Aug-18	44	297	297	8565.75
30-Aug-18	43	290.25	290.25	8856
31-Aug-18	31	209.25	209.25	9065.25



Date	Truck Load Count	Esker Volume Hauled from Fingers Pit (m³)	Esker Volume Placed in Cell 5 (m³)	Total Volume Placed in Cell 5 (m³)
01-Sep-18	39	263.25	263.25	9328.5
02-Sep-18	35	236.25	236.25	9564.75
03-Sep-18	36	243	243	9807.75
04-Sep-18	31	209.25	209.25	10017
05-Sep-18	38	256.5	256.5	10273.5
06-Sep-18	36	243	243	10516.5
07-Sep-18	37	249.75	249.75	10766.25
08-Sep-18	15	101.25	101.25	10867.5
09-Sep-18	21	141.75	141.75	11009.25
10-Sep-18	22	148.5	148.5	11157.75
11-Sep-18	21	141.75	141.75	11299.5
12-Sep-18	43	290.25	290.25	11589.75
13-Sep-18	38	256.5	256.5	11846.25
14-Sep-18	41	276.75	276.75	12123
15-Sep-18	38	256.5	256.5	12379.5
16-Sep-18	33	222.75	222.75	12602.25
17-Sep-18	38	256.5	256.5	12858.75
18-Sep-18	36	243	243	13101.75
19-Sep-18	38	256.5	256.5	13358.25
20-Sep-18	36	243	243	13601.25
21-Sep-18	41	276.5	276.5	13877.75
22-Sep-18	38	256.5	256.5	14134.25
23-Sep-18	36	243	243	14377.25
24-Sep-18	37	249.75	249.75	14627
25-Sep-18	37	249.75	249.75	14876.75
26-Sep-18	38	256.5	256.5	15133.25
27-Sep-18	37	249.75	249.75	15383
28-Sep-18	37	249.75	249.75	15632.75
29-Sep-18	33	222.75	222.75	15855.5



Date	Truck Load Count	Esker Volume Hauled from Fingers Pit (m³)	Esker Volume Placed in Cell 5 (m³)	Total Volume Placed in Cell 5 (m³)
30-Sep-18	29	195.75	195.75	16051.25
01-Oct-18	41	276.75	276.75	16328
02-Oct-18	22	148.5	148.5	16476.5
03-Oct-18	39	263.25	263.25	16739.75
04-Oct-18	41	276.75	276.75	17016.5
05-Oct-18	40	270	270	17286.5
06-Oct-18	39	263.25	263.25	17549.75
07-Oct-18	37	249.75	249.75	17799.5
08-Oct-18	37	249.75	249.75	18049.25
09-Oct-18	40	270	270	18319.25
10-Oct-18	40	270	270	18589.25
11-Oct-18	24	162	162	18751.25
12-Oct-18	14	94.5	94.5	18845.75
13-Oct-18	14	94.5	94.5	18940.25
14-Oct-18	12	81	81	19021.25
15-Oct-18	17	114.75	114.75	19136
16-Oct-18	15	101.25	101.25	19237.25
17-Oct-18	15	101.25	101.25	19338.5
18-Oct-18	7	47.25	47.25	19385.75
Total	2872	19385.75	19385.75	19385.75



Table 2: Field Records of 2018 Treated Discharge from Pond 2

Date	Syphon 1	YTD Meter			
	YTD Meter Total (m³)	Daily Meter Output (m³)	YTD Meter Total (m³)	Daily Meter Output (m³)	Total (m³)
20-Aug-18	14831	14831	12282	12282	27,113
21-Aug-18	46544	46544	43166	43166	116,823
22-Aug-18	67537	20993	63427	20261	158,076
23-Aug-18	113496	45959	108054	44627	248,662
24-Aug-18	0	0	125074	17020	265,682
25-Aug-18	161180	47684	147372	22298	335,663
26-Aug-18	206793	45613	169814	22442	403,718
27-Aug-18	254539	47746	192133	22320	473,784
28-Aug-18	300294	45755	214578	22444	541,984
29-Aug-18	346228	45934	236141	21563	609,481
30-Aug-18	391854	45627	259562	23422	678,529
31-Aug-18	437458	45603	265970	6408	730,540
1-Sep-18	481052	43595	292362	26391	800,526
2-Sep-18	525865	44812	318134	25773	871,111
3-Sep-18	570263	44398	346481	28346	943,856
4-Sep-18	614407	44144	370962	24482	1,012,481
5-Sep-18	658460	44053	395629	24667	1,081,201
6-Sep-18	700586	42126	420016	24387	1,147,715
7-Sep-18	746425	45839	444635	24617	1,218,171
8-Sep-18	788469	41682	469187	24552	1,284,767
9-Sep-18	831373	42904	494937	25751	1,353,422
10-Sep-18	873389	42378	521051	26114	1,421,914
11-Sep-18	916593	43204	547487	26436	1,491,554
12-Sep-18	957982	40989	573384	27808	1,560,351
13-Sep-18	998139	40577	601115	27731	1,629,680
14-Sep-18	1038952	40812	629531	28416	1,698,908
15-Sep-18	1078813	39861	658863	29332	1,768,101



Date	Syphon 1		Syphon 2	YTD Meter Total (m³)	
	YTD Meter Total (m³)	Daily Meter Output (m³)	YTD Meter Total (m³)	Daily Meter Output (m³)	Total (III <sup>-</sup> )
16-Sep-18	1118500	39737	688376	29513	1,837,369
17-Sep-18	1157897	39347	718217	29841	1,906,557
18-Sep-18	1196890	38993	747176	28959	1,974,509
19-Sep-18	1218944	22054	754908	7732	2,004,295



#### **APPENDIX A**

Updated Estimate of Progressive Reclamation Credit

Knight Piesold 2015   Underground Mine Unit	Patients			ctivities Completed	d by 5 July 2018 Unit Cost	Security Reduction	Notes		Updated	Planned A	Unit Cost	2019 Security Reduction	<u>Notes</u>
Control Access Backfill Adits 1,000 S	Price Total  3.49 \$ 3,494	Underground Mine Control Access	1,000	Reduction	3.49		Not planned under FCRP, but not in	Underground Mine Control Access	Quantity	Reduction	\$ 3.49		Not planned under FCRP, but not in
Cap Shafts 5 5 Backfill Open Stopes 2,250 \$	3.49 5 3,494 85,656 5 428,282 3.49 5 7,863		1,000 5 2,250	- s - s	85,656 3.49		Not planned under FCRP, but not in IARD Not planned under FCRP, but not in IARD Not planned under FCRP, but not in IARD		5 2,250		\$ 85,656 \$ 3.49		IARP Not planned under FCRP, but not in IARP Not planned under FCRP, but not in IARP
Crown Pillar Study 1 \$ Remove Hazardous Waste	25,000 \$ 25,000	Remove Hazardous Waste	1	- s	25,000		Not planned under FCRP, but not in IARP	Remove Hazardous Waste	1	-	\$ 25,000		Not planned under FCRP, but not in IARP
Total  Talings Impoundment Unit  Stabilize Embankment	\$ 464,639  Price Total	Tailings Impoundment				\$0	Dam M repairs were completed in	Tailings Impoundment				\$0	Dam M renairs were completed in
Rip Rap   90,000   S   Cover Tailings     Sell Cover   241,328   S	9.30 \$ 2,244,350	Cover Tailings	209,500	80,000 S	15.20 9.30	\$1,216,000	2016.	Cover Tailings	10,000	80,000 51,214	\$ 15.20 \$ 9.30	\$1,216,000	Dam M repairs were completed in 2016. Area has been further reduced to reflect covering of 19,386 m2 more in
Excavate and dispose 1 \$	100,000 \$ 100,000		- 1	- - s	100,000	\$0 \$0	Area has been reduced to reflect cover work completed by the end of 2017.			-	\$ 100,000	\$0 \$0	Cell 5 between July 6 and Ocother 18, 2018.
tailings cell 4  Other - cover repair 20,000 \$  Remove Tailings Discharge	9.30 \$ 186,000	Remove Takings Discharge	20,000	- s	9.30	50	Minor repairs completed in 2016 and there is no evidence that this is necessary.	Remove Tallings Discharge	20,000		\$ 9.30	50	Minor repairs completed in 2016 and there is no evidence that this is necessary.
Pipe 8,500 \$	22.00 \$ 187,000	Upgrade Spillway	8,500	- s	22.00	\$0		Upgrade Spillway		8,500	\$ 22.00	\$187,000	4000 m removed by Sept 2018; 4500 m more to be removed by June 2019.
Excavate Channel   30,600   5	9.30 \$ 284,580 15.20 \$ 304,000 3.44 \$ 24,080	Specialized Items	30,600 20,000 7,000	- S - S - S	9.30 15.20 3.44	\$0 \$0 \$0		Specialized Items	30,600 20,000 7,000	:	\$ 9.30 \$ 15.20 \$ 3.44	\$0 \$0	
instrumentation, 1 \$ supply & technician	60,000 \$ 60,000		1	- s	60,000	\$0			0.5	0.5	\$ 60,000	\$30,000	Moisture monitoring strings installed in Cell 2 and Cell 3.
Treatment Supernatant  Équipment 1 5  Annual treatment Costs	100,000 \$ 100,000	Treatment Supernatant  Annual Treatment Costs	1	- s	100,000	50		Treatment Supernatant  Annual Treatment Costs	1		\$ 100,000	50	
Total  Rock Pile  Unit  Unit	\$ 4,858,010 Price Total	Rock Pile Cover Rock Pile				\$1,512,000		Rock Pile Cover Rock Pile				\$1,909,290	
Refocite Dumps Load, Haul, Dump and Doze - m3 400,000 5	7.00 \$ 2,800,000	Relocate Dumps	400,000		7.00	\$0		Relocate Dumps	400,000		\$ 7.00	50	
Other Waste Rock Survey 1 \$	100,000 \$ 100,000	Other		1 5	100,000	\$100,000	Already credited in amendment # 2	Other		1		\$100,000	Already credited in amendment # 2
Soil/Waste Rock Risk 1 \$ Assessment 1 \$ Options Assessment 1 \$	250,000 \$ 250,000 50,000 \$ 50,000 \$ 3,200,000			1 5	250,000 50,000		Already credited in amendment # 2  Already credited in amendment # 2		-	1			Already credited in amendment # 2  Already credited in amendment # 2
Equipment and Buildings  Building Decontamination and Haz Waite Removal  Decontaminate - oil, 1 5		Buildings and Equipment Building Decontamination and Haz Wast	Equipment and Buildings e Removal		218.572	,400,000		Buildings and Equipment Building Decontamination and I	faz Waste Removal			\$218.572	Assumes this will be considered over
fuel, glycol systems 1 \$ Decontaminate offices/warehouse/ accommodations	218,572 \$ 218,572 \$ -			- 5	218,572	50			-		\$ 218,572	\$218,572 \$0	Assumes this will be completed over the winter of 2018 - 2019.
Namore Buildings Sleepers and Offices 7,329 \$	128.00 \$ 938,112	Bemave Buildings	7,329	- s	128.00	50		Remove Buildings	7,329		\$ 128.00	\$140,717	Interior gutting in winter of 2018 - 2019 will reduce further demolition effort by 15%.
Ways 5haft House 1,253 5 Warehouse 4,671 5	128.00 \$ 59,264 128.00 \$ 160,384 128.00 \$ 597,888 128.00 \$ 366,592		463 1,253 4,671 2,864	- S - S - S	128.00 128.00 128.00 128.00	50 50 50 50			463 1,253 4,671 2,864	-	\$ 128.00 \$ 128.00 \$ 128.00 \$ 128.00	\$8,890 \$24,058 \$89,683 \$34,989	as above as above as above as above
Headframe 423 \$ Airlock Building and 566 \$	128.00 S 210,560 128.00 S 52,864 128.00 S 46,848		2,864 1,645 413 366	- S - S - S	128.00 128.00 128.00	\$0 \$0 \$0	This building has already hown		1,645 413 366	-	\$ 128.00 \$ 128.00 \$ 128.00 \$ 128.00	\$31,584 \$7,930 \$7,027	as above as above as above This building has already been
Paste fil Plant 316 \$  Cold Storage 2 1,855 \$  buildings 1,855 \$	128.00 \$ 40,448 128.00 \$ 237,440		1,855	316 S	128.00	\$40,448 \$0	This building has already been removed years ago		1,855	316	\$ 128.00	\$40,448	removed years ago Interior gutting in winter of 2018 - 2019 will reduce further demolition effort by 15%.
Surface Mobile Shop 1,008 5 Carpenter Shop 482 5 As Treatment Plant 177 5 Euilding	128.00 \$ 129,024 128.00 \$ 61,696 128.00 \$ 22,656		1,008 482 177	- s - s - s	128.00 128.00 128.00	50 50 50			1,008 482 177	-	\$ 128.00 \$ 128.00 \$ 128.00	\$19,354 \$9,254 \$3,398	as above as above as above
Pumphouse	128.00 \$ 9,472 128.00 \$ 52,736 128.00 \$ 3,968 128.00 \$ 14,976		74 412 31 117	- S - S - S	128.00 128.00 128.00 128.00	50 50 50			74 412 31 117		\$ 128.00 \$ 128.00 \$ 128.00 \$ 128.00	\$1,421 \$7,910 \$395 \$2,246	as above as above as above as above
Weather Station and Storage Buildings 566 \$ Shop 379 \$	128.00 \$ 72,448 128.00 \$ 48,512		566 379	- s	128.00 128.00	\$0 \$0			566 379		\$ 128.00 \$ 128.00	\$10,867	as above as above
Batch Plant         118 5           ATV Building         172 5           Fuel Tanks         1 5	128.00 \$ 15,104 128.00 \$ 22,016		118 172	- S - S	128.00 128.00 599,850.00	\$0 \$0			118 172	0.33	\$ 128.00 \$ 128.00	\$2,266 \$3,302 \$197,951	as above as above 26 out of 38 smaller tanks have been cleaned and certified and will be cut
Piping S	\$ 599,850 24.00			- 5	24.00	50 50			0.67	-	\$ 24.00	\$0 \$0	up for landfilling by June 2019. 12 small and 15 large tanks remain.
freshvater Intake foundation Slabs - leave in please and cover - hrs				-		50	<u></u>			-		50	Generator was removed, but no corresponding cost in K-P estimate.
cover - hrs  Landfill for Demolition Waste Isolate Buildings Invate, water, elycol. 24,562 5	12.63 5 310.239	Landfill for Demolition Waste	24.562	-	12.63	\$0		Landfill for Demolition Waste	24.562	-	\$ 12.63	\$0	
(waster, water, glycel, serwer)         24,562 S           serwer)         5           Bone Yard Clean Up         1 S           Operation of Landfill         1 S	12.63 \$ 310,239 350,000 \$ 350,000 450,000 \$ 450,000		24,562 1 1	- S	12.63 350,000 450,000	\$0 \$0			24,562 1 1	-	\$ 12.63 \$ 350,000 \$ 450,000	\$0 \$0	
Grade and Contour  Grade/Contour Entire  Mine Site Area  230,000 \$	4.47 S 1,028,573	Grade and Contour	230,000		4.47	***		Grade and Contour	230,000		\$ 4.47	40	
Mine Site Area  Concrete Slab Removal 25,000 \$  Reclaim Roads	7.28 \$ 181,955	Reclaim Roads	25,000	- s	7.28	50		Reclaim Roads	25,000		\$ 7.28	\$0	
Scarify and install 12 \$ water breaks 1 \$ Grade ainstrip 1 \$	6,272.39 \$ 75,269 20,000.00 \$ 20,000		12	- s	6,272.39	50			12		\$ 6,272.39 \$ 20,000.00	\$0	
Other - main water 1 5	5,000 \$ 5,000 \$ 6,402,466		1	- \$	5,000	50 \$40,648			1		\$ 5,000	\$0 \$925,355	
Chemicals Unit Hazardous Materials Audit Hazardous Waste Audit 1 5	25,000 \$ 25,000	Chemicals Hazardous Material Audit	Chemicals -	1 5	25,000	\$25,000	Already credited in amendment # 2	Chemicals Hazardous Material Audit		1	\$ 25,000	\$25,000	Already credited in amendment # 2
Suiding Decontamination and Haz Waste Removal Decontaminate - oil,		Building Decontaminate and Haz Waste	ternoval					Building Decontaminate and Ha	z Waste Removal				
fuel, glycol systems  Removal of Asbestos ontaining materials					-						-		Removed debit of \$387,602 added in
(ACM)  Hazardous Materials Consolidated for Removal  Waste Olis 100,000 \$			1	(1)	387,602	-\$387,602	Debit of \$387,602 added in Amendment No. 2 for removal of				387,602	50	Amendment No. 2 for removal of
	1.20 \$ 120,000	Hazardous Materials Consolidated for Re	moval	(1)			ACM.	Hazardous Materials Consolidat	ed for Removal			50	Amendment No. 2 for removal of ACM. Assumed this will be completed in the winter of 2018 - 2019.
Waste Ofs 100,000 5  Fuel 2,344,460 5  Waste batteries 100 5	1.20 \$ 120,000 1.20 \$ 2,813,352 23 \$ 2,500	Hazardous Materials Consolidated for Re	Troval	(1) S 2,944,460 S - S	1.20 1.20 25		Majority of waste oil have been removed from site during 2015, 2015 and 2017.	Hazardous Materials Consolidat	ed for Removal  - 100	2,344,460	\$ 1.20 \$ 1.20 \$ 25	\$2,813,352	Armandment No. 2 for removal of ACM. Assumed this will be completed in the winter of 2018 - 2019. Majority of waste oil have been removed from site during 2015, 2015 and 2017 \$2,770,352 already credited in
fuel   2,344,460   5   Waste batteries   100   5	1.20 \$ 2,813,352	Plazardious Materiuls Consolidated for N	1 movel 100	2,344,460 \$ - \$ 133 \$	1.20	\$2,813,352				2,344,460	\$ 1.20	\$2,813,352 \$2,813,352	Arrendment No. 2 for removal of ACM. Assumed this will be completed in the winter of 2018 - 2019. Majority of waste oil have been removed from site during 2015, 2015 and 2017 \$3,770,382 already credited in
Fasel	1.70 \$ 2,811,152 25 \$ 2,500 25 \$ 25,000 26 \$ 25,000	Taxardous Materials Consolidated for to  Taxardous Materials  Contaminated Sol	1 moreal	- S	1.20 1.20 25 25	\$2,813,352 \$3,320 \$0	Majority of waste oil have been removed from size during 2015, 2015 and 2017 \$2,279,332 already ordified in enterferent #2 Majority of batteries have been removed from size during 2017 Majority of sasay and lab reagents have been removed from size during 2016 and 2017	Meandow Materials Consolidat  Meandow Materials  Contenidate Salt		155	\$ 120 \$ 120 \$ 25 \$ 25	\$3,865 \$5,450	Assandament No. 2 for removal of No. 2 Assand the base to be completed to the winter of 2018 - 2019. Majority of waste of laves been seasoned from site during 2015, 2015 and 2017 \$2,778,333 dready credited as sometiment 2 2 Algority of batteries have been seasoned from the during 2017. As distinct of 2118 from site (40,000 consorted from the during 2017 As additional 2.18 from site (40,000 pounds) have been removed from site during the summer of 2018. 212 february (60,000 pounds) removed during 2018.
Fuel   2,344,460   5   Waste betteries   100   5   Sasay and sentermental lab engagers.   1,000   5   Sasay and Sa	1.20 \$ 2,813,352 25 \$ 2,500 25 \$ 25,000	Hazardiou Materials		- s	1.20 1.20 25 25	\$2,813,852 \$3,320 \$0 \$30,087	Majority of waste all have been removed from bits during 2015, 2015 and and 2017 27 27 2015. The second of the second of the second of second of second second of second of second	Hiszardous Materials		155	\$ 1.20 \$ 1.20 \$ 25 \$ 25	\$3,865 \$5,450	Amendment flow. 2 for removal of the state of 2018. 2019.  Majority of waste of have been removed from like during 2019. 2019.  Majority of waste of have been removed from like during 2019. 2019.  Majority of bustness of 2 controlled in administration of 2 controlled in 2 control
Paul	1.00 \$ 2.011.151 25 \$ 2.500 25 \$ 25,000 25 \$ 25,000 260 \$ 23,000 60.17 \$ 2.400,067 5.70 \$ 1.1.401 5.70 \$ 4.001	Hazardiou Materials		- S	120 120 25 25 25 26 60.17	\$2,83,362 \$3,220 \$0 \$90,087	Majority of waste on have been conceased from the during 2015, 2015 17,7 RN3 already 2015, 2015 17,7 RN3 already 2015, 2015 17,7 RN3 already 2015 17,7 RN3	Hiszardous Materials		155	\$ 1.10 \$ 1.20 \$ 25 \$ 25 \$ 25 \$ 5 25 \$ 5 25 \$ 5 25 \$ 5 25 \$ 60.17	\$3,865 \$5,450 \$30,087	Accordinate for 25 for removal of the Accordinate for 25 for removal of the Accordinate for 25 for removal of the Accordinate for 25 for a
New   2,344-400   5	1.20 \$ 2,811,932 25 \$ 2,500 25 \$ 21,000 26 \$ 21,000  90.17 \$ 2,406,967  5.77 \$ 1,468	Hazardiou Materials		- S	1.20 1.20 25 25 25 290 60.17	\$2,813,852 \$3,320 \$0 \$30,087	Majority of waste on have been conceased from the during 2015, 2015 17,7 RN3 already 2015, 2015 17,7 RN3 already 2015, 2015 17,7 RN3 already 2015 17,7 RN3	Hiszardous Materials		155	\$ 1.20 \$ 1.20 \$ 25 \$ 25 \$ 25 \$ 60.17	\$3,865 \$5,450 \$30,087	Amendment flow. 2 for removal of the state of 2018. 2019.  Majority of waste of have been removed from like during 2019. 2019.  Majority of waste of have been removed from like during 2019. 2019.  Majority of bustness of 2 controlled in administration of 2 controlled in 2 control
Paul	1.00 \$ 2.011.151 25 \$ 2.500 25 \$ 25,000 25 \$ 25,000 260 \$ 23,000 60.17 \$ 2.400,067 5.70 \$ 1.1.401 5.70 \$ 4.001	Teachine Mannini Contembrated Sect		- S	120 120 25 25 25 26 60.17	\$2,83,362 \$3,220 \$0 \$90,087	Majority of waste on have been conceased from the during 2015, 2015 17,7 RN3 already 2015, 2015 17,7 RN3 already 2015, 2015 17,7 RN3 already 2015 17,7 RN3	Neordon Material Contaminated last		155	\$ 1.10 \$ 1.20 \$ 25 \$ 25 \$ 25 \$ 5 25 \$ 5 25 \$ 5 25 \$ 5 25 \$ 60.17	\$3,865 \$5,450 \$30,087	Accordinate for 25 for removal of the Accordinate for 25 for removal of the Accordinate for 25 for removal of the Accordinate for 25 for a
Paul	1.00 \$ 2.011.552 20 \$ 1,000 20 \$ 21,000 20 \$ 21,000 20 \$ 24,000 200 \$ 24,000 200 \$ 1,000,000 200,000 \$ 1,000,000 200,000 \$ 200,000	Teachine Mannini Contembrated Sect		- S	120 120 25 25 25 26 60.17	\$2,413,752 \$3,350 \$0 \$30,667	Majority of washed on Name Seens removed from the during 2015, 2015 2015, 2015 2015 2015 2015 2015 2015 2015 2015	Neordon Material Contaminated last		155	\$ 1.10 \$ 1.20 \$ 25 \$ 25 \$ 25 \$ 5 25 \$ 5 25 \$ 5 25 \$ 5 25 \$ 60.17	\$3,450 \$5,430 \$30,007	Accordinate for 25 for removal of the Accordinate for 25 for removal of the Accordinate for 25 for removal of the Accordinate for 25 for a
Paul	1.00 \$ 2.011.512 20 \$ 2.000 20 \$ 2.000 20 \$ 2.000 20 \$ 2.000 20 \$ 2.000 20 \$ 1.000 20 \$	Teachine Mannini Contembrated Sect		- S	120 120 25 25 25 26 60.17	\$2,413,752 \$3,350 \$0 \$30,667	Majority of washed on Name Seens removed from the during 2015, 2015 2015, 2015 2015 2015 2015 2015 2015 2015 2015	Standard Materia  Contempoded Sell  Options and Sell Sell Sell Sell Sell Sell Sell Sel		155	\$ 1.10 \$ 1.20 \$ 25 \$ 25 \$ 25 \$ 5 25 \$ 5 25 \$ 5 25 \$ 5 25 \$ 60.17	\$3,450 \$5,430 \$30,007	Accordinate for 25 for removal of the Accordinate for 25 for removal of the Accordinate for 25 for removal of the Accordinate for 25 for a
Fig.   2,344,400   5	1.00 \$ 2.613.193. 25 \$ 1.500 25 \$ 25,000 25 \$ 25,000 26 \$ 25,000 270 \$ 1.000 2	Teachine Mannini Contembrated Sect		- S	120 120 25 25 25 26 60.17	\$2,413,752 \$3,350 \$0 \$30,667	Majority of washed on Name Seens removed from the during 2015, 2015 2015, 2015 2015 2015 2015 2015 2015 2015 2015	Standard Manage Contemporal for Contemporal for Contemporal for Contemporal for Contemporal for Management		155	\$ 1.10 \$ 1.20 \$ 25 \$ 25 \$ 25 \$ 5 25 \$ 5 25 \$ 5 25 \$ 5 25 \$ 60.17	\$3,450 \$5,430 \$30,007	Accordinate for 25 for removal of the Accordinate for 25 for removal of the Accordinate for 25 for removal of the Accordinate for 25 for a
Land	1.00 \$ 2.011.51. 20 \$ 1,000 20 \$ 2,000 20 \$ 2,000 20 \$ 2,000 20 \$ 2,000 20 \$ 1,000 20 \$ 1,000 20 \$ 1,000 20 \$ 1,000 20 \$ 1,000 20 \$ 2,000 20 \$	Thursday Materials Collectioned Sci   Collectioned Sci   Collectioned Sci   Annual Sci   Collectioned Sci   Annual Sci   Collectioned Sci   Annual Sci   Collectioned Sci   Annual Sci   Collectioned Sci		- S	120 120 25 25 25 26 60.17	\$2,813,922 \$3,320 \$0 \$90,007 \$2,664,357 \$6	Majority of washi oil have been removed from bind advised 2015, 2015 2015, 2015 2015 2015 2015 2015 2015 2015 2015	Standard Manage Contemporal for Contemporal for Contemporal for Contemporal for Contemporal for Management		155	\$ 1.10 \$ 1.20 \$ 25 \$ 25 \$ 25 \$ 5 25 \$ 5 25 \$ 5 25 \$ 5 25 \$ 60.17	\$3,450 \$5,430 \$30,007	Accordinate for 25 for removal of the Accordinate for 25 for removal of the Accordinate for 25 for removal of the Accordinate for 25 for a
Part	1.00 1 2.013.151 25 5 1,000 25 5 23,000 26 5 23,000 270 5 23,000 270 5 24,000 270 5 24,000 270 5 24,000 270 7	Thursday Materials Collectioned Sci   Collectioned Sci   Collectioned Sci   Annual Sci   Collectioned Sci   Annual Sci   Collectioned Sci   Annual Sci   Collectioned		- S	120 130 21 25 25 250 200 60.17 5.72 5.72 200,000	\$2,813,925 \$3,320 \$5,320 \$50,047 \$200,000	Majority of washi oil have been removed from bind advised 2015, 2015 1975 275 285 285 285 285 285 285 285 285 285 28	Manadas Manada Contemporal to: Contemporal to:	78	155	\$ 1.10 \$ 1.20 \$ 25 \$ 25 \$ 25 \$ 5 25 \$ 5 25 \$ 5 25 \$ 5 25 \$ 60.17	\$3,000 \$4,400 \$100,000 \$300,000	Accordinate for 25 for removal of the Accordinate for 25 for removal of the Accordinate for 25 for removal of the Accordinate for 25 for a
Paul	1.00 \$ 2.011.552 20 \$ 2.000 20 \$	Hardway Malandy Contaminated fact  Contaminated fact  Contaminated fact flammoust  State Management  State Management  Malandarian  Malandarian  Malandarian		- S	120 120 23 25 25 20 60.17 573 573 200,000	\$2,413,352 \$3,200 \$50,007 \$300,000 \$2,484,197 \$5 \$4,636,605	Majority of washi on News beam removed from bind during 2015, 2015 on more of the most of the property of the 2015 August of the property of the Majority of faitheress have been removed from the dark 2017 Majority of faitheress have been removed from the dark 2017 Majority of faitheress have been seen and the seen Majority of faitheress have been property of the seen Majority of faitheress from the during 2016 and 2017 2016 and 2017 2018 and 2017 2018	Tenerated Management Contemporate leaf Contempor	78	155	\$ 130,000 \$ 120,000 \$ 20,000 \$ 20	\$3,400 \$3,400 \$30,000 \$300,000 \$3,677,754	According to the Section of the Section of the Section of Section
Paul	1.00 \$ 2.011.51. 20 \$ 2.011.51. 20 \$ 2.000 2	Hardway Malandy Contaminated fact  Contaminated fact  Contaminated fact flammoust  State Management  State Management  Malandarian  Malandarian  Malandarian		- S	130 130 23 25 25 20 20 60.17 573 573 200,000	\$2,813,313 \$3,120 \$5 \$5 \$50,002 \$200,000 \$200,000 \$4,636,605 \$150,000	Majority of washi on have been received from the during 2015, 2015   "The common of the common of th	Tenerated Management Contemporate leaf Contempor	78	155	\$ 130,000 \$ 120,000 \$ 23,000 \$ 20,000 \$	\$3,000 \$3,000 \$300,000 \$3,007,754 \$5,000,000 \$5,000,000 \$5,000,000 \$5,000,000 \$5,000,000	According to the Control of the Cont
Paul	1.00 \$ 2,813,752 25 \$ 2,500 25 \$ 25,000 26 \$ 25,000 270 \$ 24,000 270 \$	Hardway Malandy Contaminated fact  Contaminated fact  Contaminated fact flammoust  State Management  State Management  Malandarian  Malandarian  Malandarian		- S	1.20 1.20 23 23 23 23 23 24 25 20 20 20 20 20 21 20 20 20 21 21 20 20 21 21 21 21 21 21 21 21 21 21 21 21 21	\$2,813,352 \$3,300 \$0 \$2,603,007 \$200,000 \$2,603,132 \$4,636,605 \$100,000 \$50,	Majority of washi oil bare been received from which of the 2015, 2015 (2015) (2	Tenerated Management Contemporate leaf Contempor	78	115 500	\$ 1,100 M 100 M 10	\$3,000 \$3,000 \$300,000 \$3,007,754 \$5,000,000 \$5,000,000 \$5,000,000 \$5,000,000 \$5,000,000	According to the Control of the Cont
Part	1.00 \$ 2,411,173   25 1,500   25	Hardway Malandy Contaminated fact  Contaminated fact  Contaminated fact flammoust  State Management  State Management  Malandarian  Malandarian  Malandarian		- S	1.20 1.20 1.20 1.20 2.1 2.1 2.1 2.1 2.1 2.1 2.1 2.1 2.1 2.1	\$2,813,923 \$3,320 \$0 \$30,007 \$2,664,337 \$2,664,337 \$3,664,37	Majority of washi oil have been consorted from which during 2015, 2015   The consorted from which during 2015, 2015   The consorted from which during 2015, 2015   The consorted from which during 2015   Majority of inflations have been consorted from which 2017   Majority of inflations have been consorted from the during 2017   Majority of inflations from the during 2014   Majority of inflations and the consorted from the consor	Tenerated Management Contemporate leaf Contempor	78	115 500	\$ 1,100.000 \$ 1,10	\$1,000 \$4,007 \$100,000 \$100,00	According to the Control of the Cont
Paul   2,344,400   5	1.00 \$ 2.011.151. 20 \$ 2.001.151. 20 \$ 2.000.000 20	Trappoles Materials  Contaminated Self  Contaminated Self Removed  Contaminated Self Removed  Water Management  JOHA Self-1 COST COMPARISON  Despressors, reposit control to the  Explanation of the Self-1 Cost of the Self-1		- S	1.20 1.20 23 23 25 20 60.17 5.72 200,000 150,000 150,000 150,000 150,000	\$2,813,323 \$3,200 \$0 \$30,007 \$30,007 \$30,000 \$10,000 \$10,000 \$10,000 \$10,000 \$10,000	Majority of washi oil bara been concern from which and gold 2015. 2015 3, 2015 4, 2015	Transfers Milesels  Contaminated but  Contaminated but  Contaminated first Reviews  Contaminated first Reviews  Nation Mileselsels  Nation Milesel	78	115 500	\$ 139,000 \$ 120,000 \$ 120,000 \$ 120,000 \$ 120,000 \$ 130,000 \$ 130,000	\$1,000 \$10,000 \$10,000 \$100,000 \$100,000 \$500,000 \$100,000 \$100,000 \$100,000 \$100,000 \$100,000 \$100,000	According to the Control of the Cont
Paul	1.00 \$ 2.011.51. 20 \$ 2.00.00 20 \$ 2.00.00 20 \$ 2.000 20 \$ 2.000 20 \$ 2.000 20 \$ 1.000 20 \$ 1.000 20 \$ 2.000 2	Trappoles Materials  Contaminated Self  Contaminated Self Removed  Contaminated Self Removed  Water Management  JOHA Self-1 COST COMPARISON  Despressors, reposit control to the  Explanation of the Self-1 Cost of the Self-1		133 5 5 5 5 5 5 5 5 5 5 5 5 5 5 5 5 5 5	1.20 1.20 2.3 2.3 2.3 2.3 2.3 2.3 2.3 2.3 2.3 2.3	\$2,413,312 \$3,300,000 \$300,000 \$3,000,000 \$3,000,000 \$500	Majority of washi oil bare been received from which of the 2015, 2015 (2015) (2	Transfers Milesels  Contaminated but  Contaminated but  Contaminated first Reviews  Contaminated first Reviews  Nation Mileselsels  Nation Milesel	78	155 500 1 5 1 5 1 5 1 5 1 5 1 5 1 5 1 5	\$ 110,000 \$ 120,000 \$ 120,000 \$ 120,000 \$ 150,000 \$ 150,	\$3,000,000 \$300,000 \$	According to the Control of the Cont
Final 2, 2444-60 \$  White ball with the control of	1.00 \$ 2,813,752 22 \$ 2,500 23 \$ 2,500 24 \$ 2,500 25 \$ 2,500 26 \$ 2,500 27 \$ 3 2,600,90 27 \$ 3 3,650,90 28 \$ 3 3,650,90 29 \$ 3 3,650,90 20 \$ 3	Trappoles Materials  Contaminated Self  Contaminated Self Removed  Contaminated Self Removed  Water Management  JOHA Self-1 COST COMPARISON  Despressors, reposit control to the  Explanation of the Self-1 Cost of the Self-1		133 5 5 5 5 5 5 5 5 5 5 5 5 5 5 5 5 5 5	1.20 1.20 23 23 23 23 23 23 23 23 23 23 23 23 20 20 20 20 20 20 20 20 20 20 20 20 20	\$2,813,352 \$3,200 \$0 \$0,000 \$2,644,32 \$	Majority of washi oil bara been concern from which and gold 2015. 2015 3, 2015 4, 2015	Transfers Melecon  Contaminated bed  Contaminated bed  Contaminated bed bed  C	78	155 500 1 5 1 5 1 5 1 5 1 5 1 5 1 5 1 5	\$ 130,000 \$ 130,	\$3,000,000 \$300,000 \$	According to the Control of the Cont
Part   2,344,400   5	1.00 \$ 2.011.51. 20 \$ 2.011.51. 20 \$ 2.000  20 \$ 2.000  20 \$ 2.000  20 \$ 2.000  20 \$ 2.000  20 \$ 2.000  20 \$ 2.000  20 \$ 2.000  3 \$ 2.000  3 \$ 2.000  3 \$ 2.000  5 \$ 2.0000  5 \$ 2.0000  5 \$ 2.0000  5 \$ 2.0000  5 \$ 2.0000  5 \$ 2.0000  5 \$ 2.0000  5 \$ 2.0000  5 \$ 2.0	Teachine Management  Gesterminated Soil  Gesterminated Soil Removed  Gesterminated Soil Removed  John Management  John Soil Conference of Conf	100	133 5 5 5 5 5 5 5 5 5 5 5 5 5 5 5 5 5 5	1.20 1.20 2.3 2.3 2.3 2.3 2.3 2.3 2.3 2.3 2.3 2.3	\$2,813,352 \$3,200 \$0 \$0,000 \$2,644,32 \$	Majority of washi oil bara been concern from which and gold 2015. 2015 3, 2015 4, 2015	Transmission Management  Contaminated bed for Contaminated bed for Contaminated bed for Management  The Contaminated bed f	73	155 500 1 5 1 5 1 5 1 5 1 5 1 5 1 5 1 5	\$ 130,000 \$ 130,000	\$3,000,000 \$300,000 \$	According to the Control of the Cont
Part   2,344,600   5	1.00 1 2.011.151. 22 1 2.000. 23 1 2.000. 23 1 2.000. 24 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2	Trappoles Materials  Contaminated Self  Contaminated Self Removed  Contaminated Self Removed  Water Management  JOHA Self-1 COST COMPARISON  Despressors, reposit control to the  Explanation of the Self-1 Cost of the Self-1	100	133 5 5 5 5 5 5 5 5 5 5 5 5 5 5 5 5 5 5	1.20 1.20 2.3 2.3 2.3 2.3 2.3 2.3 2.3 2.3 2.3 2.3	\$2,813,352 \$3,200 \$0 \$0,000 \$2,644,32 \$	Majority of washi oil bara been concern from which and gold 2015. 2015 3, 2015 4, 2015	Transfers Melecon  Contaminated bed  Contaminated bed  Contaminated bed bed  C	73	155 500 1 5 1 5 1 5 1 5 1 5 1 5 1 5 1 5	\$ 1,200 00 00 00 00 00 00 00 00 00 00 00 00	\$3,007,754  \$30,000  \$30,077,754  \$30,000  \$30,077,754  \$50,000  \$500,000  \$500,000  \$500,000  \$500,000  \$51,040,000  \$51,044,000  \$51,	According to the Control of the Cont
Part	1.00 \$ 2.013.352 20 \$ 1.000 20 \$ 2.000,000 20 \$ 2.0	Trapeled Materials  Carteninated Sed  Galaminated Sed  Galaminated Sed Removal  Galaminated Sed Removal  White Management  John Long Control Communication  Materials Sed Removal  John Long Control Communication  John Long Control Communication  John Long Control Communication  John Long Control Communication  White Management  Part Clearer Management  Part Cl	100 100 100 100 100 100 100 100 100 100	- 5 133 5 500 5 500 5 15 5 1 5 1 5 1 5 1 5 1 5 1 5 1 5 1 5	1.20 1.20 1.20 1.20 2.1 2.1 2.1 2.2 2.2 2.2 2.2 2.2 2.2 2.2	\$2,813,323 \$3,200 \$0 \$0 \$100,000 \$100,000 \$100,000 \$10,000 \$110,000	Majority of wash of have been immoved from bind advised 2019, 2019.  Significant with a series of the common of the of th	Transfers Materia  Contaminated bed  Contaminated bed  Contaminated bed bed below the second bed bed bed bed bed bed bed bed bed be	73	155 22 500 1 1 1 2 2 2 2 3 3 3 3	\$ 1,100.00 \$ 1,100.00	\$3,007,754  \$30,000  \$30,077,754  \$30,000  \$30,077,754  \$50,000  \$500,000  \$500,000  \$500,000  \$500,000  \$51,040,000  \$51,044,000  \$51,	According to the Control of the Cont
Part	1.00 \$ 2,013,532 20 \$ 2,000 20 \$ 2,000 20 \$ 2,000 20 \$ 2,000 20 \$ 1,000 20 \$ 1,000 20 \$ 1,000 20 \$ 2,000 20 \$	Trapellous Materials  Contaminated Soil  Contaminated Soil Removed  Contami	100 100 100 100 100 100 100 100 100 100	- 5 133 5 500 5 500 5 15 5 1 5 1 5 1 5 1 5 1 5 1 5 1 5 1 5	1.20 1.20 2.3 2.3 2.3 2.3 2.3 2.3 2.3 2.3 2.3 2.3	\$2,813,923 \$3,200 \$00 \$100,000 \$2,664,152 \$4,636,605 \$100,000 \$100,00	Majority of wash of have been immoved from bind advised 2019, 2019.  Significant with a series of the common of the of th	Transition Milesters  Contaminated bed  Contaminated bed  Contaminated bed between the contaminated bed bed bed bed bed bed bed bed bed b	73	2 2 3 3 3 3 4 4 4 5 5 6 6 6 6 6 6 6 6 6 6 6 6 6 6 6	\$ 1,100 Miles	\$3,007,754  \$30,000  \$30,077,754  \$30,000  \$30,077,754  \$50,000  \$500,000  \$500,000  \$500,000  \$500,000  \$51,040,000  \$51,044,000  \$51,	According to the Control of the Cont
Part	1.00 1 2.011.151. 20 1 2.011.151. 20 1 2.000. 20 2 2.000. 20 2.000. 20 2.0	Triportion Materian  Geldeninsid for  Geldeninsid  Materian  Geldeninsid  Materian  Geldeninsid  Geldeninsid	100 100 100 100 100 100 100 100 100 100	- 5 133 5 500 5 500 5 15 5 1 5 1 5 1 5 1 5 1 5 1 5 1 5 1 5	1.20 1.20 1.20 1.20 2.1 2.1 2.1 2.2 2.2 2.2 2.2 2.2 2.2 2.2	\$2,813,923 \$3,200 \$00 \$100,000 \$2,664,152 \$4,636,605 \$100,000 \$100,00	Majority of wash of have been received from the during 2015, 2015  The common of the most during 2015, 2015  The common of the most during 2015, 2015  The common of the c	Transition Minimum Conteminated Self Conteminate	73	2 2 3 3 3 3 4 4 4 5 5 6 6 6 6 6 6 6 6 6 6 6 6 6 6 6	\$ 1,100.000 \$ 1,10	\$3,007,754  \$30,000  \$30,077,754  \$30,000  \$30,077,754  \$50,000  \$500,000  \$500,000  \$500,000  \$500,000  \$51,040,000  \$51,044,000  \$51,	According to the Control of the Cont
Part	1.00 1 2.011.151. 20 1 2.011.151. 20 1 2.000. 20 2 2.000. 20 2.000. 20 2.0	Teachine Manuals  Conformated and  Conformated and  Conformated and Revision of  Conformated and Revision of  STAL MARKET COST COMPARATION  A MARKAT COST COMPARATION  Transporest, regional centre to tale  A Markation of Comparation	100 100 100 100 100 100 100 100 100 100	- 5 133 5 500 5 500 5 15 5 1 5 1 5 1 5 1 5 1 5 1 5 1 5 1 5	1.20 1.20 1.20 1.20 2.1 2.1 2.1 2.2 2.2 2.2 2.2 2.2 2.2 2.2	\$2,813,923 \$3,200 \$00 \$100,000 \$2,664,152 \$4,636,605 \$100,000 \$100,00	Majority of wash of have been received from the during 2015, 2015  The common of the most during 2015, 2015  The common of the most during 2015, 2015  The common of the c	Nacional Material  Districtional feel description  Districtional feel feel feel feel feel feel feel fe	73	2 2 3 3 3 3 4 4 4 5 5 6 6 6 6 6 6 6 6 6 6 6 6 6 6 6	\$ 130,000 \$ 130,000	\$3,007,754  \$30,000  \$30,077,754  \$30,000  \$30,077,754  \$50,000  \$500,000  \$500,000  \$500,000  \$500,000  \$51,040,000  \$51,044,000  \$51,	Accordance for the Common of t
Part	1.00 \$ 2,013,514  20 \$ 2,000,600  20 \$ 2,000,600  80 10 \$ 2,000,600  80 10 \$ 200,000  10 \$ 200,000	Triportion Materian  Geldeninsid for  Geldeninsid  Materian  Geldeninsid  Materian  Geldeninsid  Geldeninsid	100 100 100 100 100 100 100 100 100 100	- 5 133 5 500 5 500 5 15 5 1 5 1 5 1 5 1 5 1 5 1 5 1 5 1 5	1.20 1.20 23 23 23 23 23 23 23 23 23 23 23 23 23	\$2,813,923 \$3,200 \$00 \$100,000 \$2,664,152 \$4,636,605 \$100,000 \$100,00	Majority of wash of have been received from the during 2015, 2015  The common of the most during 2015, 2015  The common of the most during 2015, 2015  The common of the c	Transition Minimum Conteminated Self Conteminate	20 100 100 100 100 100 100 100 100 100 1	150 150 150 150 150 150 150 150 150 150	\$ 130,000 \$ 130,000	\$1,000,000 \$1,000	According to the Control of the Cont
Part	1.00   2.011.151. 20   3   2.011.151. 20   3   2.000. 20   3	Triportion Materian  Geldeninsid for  Geldeninsid  Materian  Geldeninsid  Materian  Geldeninsid  Geldeninsid	100 100 100 100 100 100 100 100 100 100	- 5 133 5 500 5 500 5 15 5 1 5 1 5 1 5 1 5 1 5 1 5 1 5 1 5	1.20 1.20 2.3 2.3 2.3 2.3 2.3 2.3 2.3 2.3 2.3 2.3	\$2,813,352 \$3,200 \$0 \$30,007 \$30,007 \$30,000 \$30,000 \$100,0	Majority of washi oil have been received in the control of the con	Transition Minimum Conteminated Self Conteminate	000 000 000 000 000 000 000 000 000 00	150 150 150 150 150 150 150 150 150 150	\$ 130,000 \$ 100,000 \$ 100,000	\$3,000,000 \$3,000,000 \$3,000,000 \$3,000,000 \$3,000,000 \$300,000 \$300,000 \$300,000 \$3,000 \$3,000,000 \$3,000 \$3,000 \$3,000 \$3,000,000 \$3,000 \$3,000 \$3,000 \$3,000 \$3,000 \$3,000 \$3,000 \$3,000 \$3,000 \$3,	Accordance for the Common of t
Part	1.00 \$ 2,013,352 20 \$ 2,000 20 \$	Triportion Materian  Geldeninsid for  Geldeninsid  Materian  Geldeninsid  Materian  Geldeninsid  Geldeninsid	100 100 100 100 100 100 100 100 100 100	- 5 133 5 500 5 500 5 15 5 1 5 1 5 1 5 1 5 1 5 1 5 1 5 1 5	1.20 1.20 2.3 2.3 2.3 2.3 2.3 2.3 2.3 2.3 2.3 2.3	\$2,813,352 \$3,300 \$5,300,000 \$500,000 \$500,000 \$5100,000	Majority of washi oil have been received in the control of the con	Transmission Materian  Conteminated Self  Contemina	000 000 000 000 000 000 000 000 000 00	150 150 150 150 150 150 150 150 150 150	\$ 130,000 \$ 100,000 \$ 100,000	\$1,000,000 \$1,000	Accordance for the Common of t
Part	1.00   2.011.151. 20   3   2.011.151. 20   5   2.000. 20   5   2.000. 20   5   2.000. 20   5   2.000. 20   7   1.000. 20   7   1.000. 20   7   1.000. 20   7   1.000. 20   7   1.000. 20   7   1.000. 20   7   1.000. 20   7   1.000. 20   7   1.000. 20   7   1.000. 20   7   1.000. 20   7   1.000. 20   7   1.000. 20   7   1.000. 20   7   1.000. 20   7   1.000. 20   7   2.000. 20   7	Triportion Materian  Geldeninsid for  Geldeninsid  Materian  Geldeninsid  Materian  Geldeninsid  Geldeninsid	100 100 100 100 100 100 100 100 100 100	- 5 133 5 500 5 500 5 15 5 1 5 1 5 1 5 1 5 1 5 1 5 1 5 1 5	1.20 1.20 2.3 2.3 2.3 2.3 2.3 2.3 2.3 2.3 2.3 2.3	\$2,813,353 \$3,300 \$5,300,000 \$500,000 \$	Majority of washi oil have been received in the control of the con	Transmission Materian  Conteminated Self  Contemina	000 000 000 000 000 000 000 000 000 00	150 150 150 150 150 150 150 150 150 150	\$ 130,000 \$ 100,000 \$ 100,000	\$3,000,000 \$3,000,000	Accordance for the Common of t
Part	1.00 \$ 2,013,352 20 \$ 2,000,000 20 \$ 2,000,000 20 \$ 2,000,000 3 \$ 3,000,000 3 \$ 3,000,	Triportion Materian  Geldeninsid for  Geldeninsid  Materian  Geldeninsid  Materian  Geldeninsid  Geldeninsid	100 100 100 100 100 100 100 100 100 100	- 5 133 5 500 5 500 5 15 5 1 5 1 5 1 5 1 5 1 5 1 5 1 5 1 5	1.20 1.20 2.3 2.3 2.3 2.3 2.3 2.3 2.3 2.3 2.3 2.3	\$2,813,123 \$3,120 \$5,120 \$5,120 \$5,00	Majority of washin oil have been received from the during 2015, 2015 in 2015 and the control of	Transmission Materian  Conteminated Self  Contemina	000 000 000 000 000 000 000 000 000 00	150 150 150 150 150 150 150 150 150 150	\$ 130,000 \$ 100,000 \$ 100,000	\$1,000,000 \$1,000,000	Accordance for the Common of t

**APPENDIX B** 

Work Plan for Winter 2018 - 2019

# **Proposed Lupin Mine Reclamation Activities**

#### Mine site Buildings and associated Facilities - November 2018 to July 2019

■ Remove all special / Hazardous wastes (i.e. Paints, Chemicals, Reagents, Cleaning Supplies, Miscellaneous process additives, etc.) throughout Powerhouse, Mill, sections of campsite not intended for use during reclamation activities

- Remove all Moldy ceiling tiles and Moldy office furniture
- Remove all wet/moldy files from Powerhouse, Mill, old kitchen complex, etc., and incinerate
- Remove all old personal clothing left behind from previous workers
- Remove identified Asbestos containing materials where appropriate
- Remove Glycol from heating system in sections of campsite not intended for use during reclamation activities (i.e. Old offices area, old kitchen area, etc.)
- Stockpile and segregate wastes within Cold Storage Buildings pending approved disposal
- Transfer usable fuel from the various tanks within the MTF (that is considered essentially empty) to 2 or 3 of the 1.3 million litre tanks in preparation for cleaning and demolition of the tanks
- Remove all fuel tanks from Powerhouse and Mill not required to support reclamation activities, in preparation for cleaning and demolition
- Remove all appliances and equipment from the old kitchen and recreation area, and old laundry area
- Remove all appliances containing refrigerants throughout the mine site (with the exception of those required to support campsite operations)
- Remove contents of former Explosives buildings (2), former Water Treatment Plant building (1) (also known as Arsenic Plant), various Pump stations and Transformer shelters along Tailings line
- Remove contents of former Cold Storage buildings (2) (also known as RTL shops)
- Remove contents of former Cold Storage buildings (2) adjacent to the intersection with the Winter Road
- Remove the contents of the former Freshwater Pump house in preparation for demolition
- Remove the contents of the former Sewage Pump station building, including the effluent discharge building at the Upper sewage pond
- Remove the entire contents of all dormitories not required to support reclamation activities (100 wing to 500 wing; 700 wing; and 1000 wing to 1200 wing) (assuming that 600 wing, 800 wing, and 1300 wing will be required to support reclamation activities
- Remove the contents of the former Carpentry shop (1), small support buildings around the equipment service shop / satellite tank farm pump stations (4), etc.
- Remove the contents of the former Airport building

