5.0 SUMMARY

Acid rock drainage and metal leaching assessment testwork conducted to date for the Ulu Project consists of:

- Static testing on whole ore samples (Rescan, 1991; Klohn, 1996 and 1998);
- Kinetic testing (Klohn, 1998);
 - Coarse ore (>1.5 mm fraction) humidity cell @ 22 degrees C;
 - Same coarse ore (>1.5 mm fraction) humidity cell @ 4 degrees C;
 - Fine ore (<1.5 mm fraction)(called tailings) humidity cell @ 22 degrees C;
 - Field column testing (Klohn, 1998; Echo Bay, 2002) on the same coarse ore sample (>1.5 mm fraction).

The results to date indicate that, with respect to acid generating potential:

- Compared to kinetic test results from other sites (as compiled in the International Kinetic Database, Morin,1999), the reactivity of the Ulu site materials, in terms of NP and sulphur leaching rates, are low.
- Coarse and fine ore with NPR<3 is considered potentially acid generating (PAG) at 22 degrees C under humidity cell test conditions with prolonged weathering (Klohn, 1998).
- Under colder conditions, the NPR required to eliminate the possibility of ARD from coarse ore under humidity cell conditions can be as high as 7, however the amount of acid released on an annual basis is expected so low that it should not cause any significant impact (Klohn, 1998).
- These NPR thresholds, based on humidity cell conditions, are considered conservative by MEMI for field conditions where lower flushing rates and volumes are expected to reduce NP depletion rates. Field conditions do not appear to affect sulphur depletion rates.
- Results from the field columns suggest that threshold NPRs to avoid acidic drainage may be as low as 1.3 and 2.0. The reduced threshold NPR values (as compared to the humidity cell test results) are attributed to the reduced NP depletion rate, as a result of lower flushing volumes and frequency under field conditions. However, these field column NPR threshold values should be viewed with caution as all oxidation products may not be released as they are produced, and the sulphate release rates may continue to increase as products build up and become available for release on subsequent flush events. Confirmation and use of these lower threshold NPR values would require continued test work (allowing for stabilization of oxidation rates), or dismantling and analysis of field columns.
- Under field conditions, a threshold NPR of 3 is considered a reasonably conservative means of classifying PAG waste materials to avoid the onset of acid generation.
 From the existing database, this appears to be consistent with a total sulphur cutoff of 0.2%.

- The coarse ore field column did not produce acidic drainage in 5 years of testing.
 Lag times to produce acidic drainage, even for relatively high sulphide samples (i.e.
 1.2 to 1.5 % total sulphur) and fine grainsizes (< 1.5 mm), are likely to be in the order of decades.
- Given the characteristics of the coarse ore and fine ore or tailings samples used in the kinetic tests relative to the current sample database, the humidity cell and field tests appear to provide reasonable worst case results, rather than average or expected results from ore materials.
- Given the characteristics of the selected waste rock sample used in the humidity cell tests relative to the current sample database, the results from the waste rock humidity cell tests are likely to represent reasonable worst case results, rather than average or expected results for waste materials. However, waste rock characteristics appear to be highly variable, as demonstrated by the range in NPR results of 0.1 to 137 for the 37 waste rock samples in the current database, such that a portion of the waste rock may be more reactive than the tested samples.
- The characteristics of ore samples collected to date, along deposit mineralogy, suggest that all ore will likely have a NPR<3, therefore all ore should be classified as PAG.
- Based on the ABA database compiled to date, and a threshold NPR of 3 for separating PAG and NPAG material, gabbro and diabase material for the most part are likely to be NPAG, greywacke may be PAG or NPAG depending on the sulphur content, mafic volcanics are likely to be PAG, basalt material is highly variable but generally PAG and all ore and altered material are PAG.
- The onset of acidic conditions, and/or predicted metal leaching, may not necessarily result in significant adverse affects on the environment. Impact assessments are required to assess potential impacts, and typically take into account the mass of material maintained in a frozen state, volume and grainsize of the stockpiled material, site temperatures, the tendency for water to flow through channels and bypass many of the rock surfaces potentially holding stored oxidation products, and the volume of runoff and leachate that may contact the stockpile materials. MEMI recommends that impact assessments for specific site conditions be conducted to quantitatively define potential impacts associated with temporary and/or permanent storage of ore or waste rock on site.

With respect to the metal leaching potential:

Arsenic and zinc leaching may be of concern at neutral pH. Arsenic leaching from
ore samples under field conditions at neutral pH appears to occur rapidly, and
achieved concentrations in the field in the range of 0.5 mg/L to 2 mg/L, i.e. may
exceed the federal <u>Metal Mining Effluent Regulations</u> maximum allowable values.
However, release or loading rates under field conditions are low relative to humidity
cell results, such that impacts to the receiving environment may not be significant.

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Quantitative predictions are required to determine the significance of potential impacts.

- Klohn (1998) did not consider metal leaching to be a potential problem for waste rock
 materials, based on the waste rock kinetic test results and the geological description
 of the ore deposit. However, the current database is limited, and metal content may
 be elevated in portions of the waste rock, for example in rock in close proximity to the
 ore body. The potential for metals, such as arsenic and zinc, leaching from waste
 rock at neutral pH should be considered in impact predictions.
- Metal leaching under acidic conditions have not been assessed, as acidic conditions
 are not predicted to occur for decades. If acidic conditions should eventually
 develop, leaching rates of other metals, such as copper, are expected to increase.

6.0 IMPLICATIONS FOR ORE AND MINE WASTE MANAGEMENT

Significant findings from the two extended field column tests conducted on the coarse ore material, that have potential implications for ore and waste rock management include the following:

6.1 Implications for Ore Stockpiles

- Given the characteristics of the coarse ore and fine ore or tailings samples, the humidity cell and field tests are likely to provide reasonable worst case results, rather than average or expected results.
- High arsenic concentrations, and elevated zinc concentrations are anticipated from coarse ore (>1.5 mm) materials located in the active layer on site at neutral pH. These arsenic concentrations may be of concern as they occasionally exceeded the federal <u>Metal Mining Effluent Regulations</u> maximum allowable values, particularly in the later stages of the 5 year test.
- Actual ore stockpiles that include some finer (<1.5 mm) material would produce higher arsenic and zinc release rates, higher zinc and arsenic concentrations, higher sulphate and NP depletion rates and more rapid onset of acid generating conditions than suggested by the field columns conducted solely on the coarse ore fraction.
- Klohn's NPR threshold values to avoid acidic drainage, calculated from humidity cell results, of 3 and 7 for 22 °C and 4 °C respectively, are considered conservative due to the relatively large volumes of water used in a humidity cell test as compared to field conditions. Lag times before the onset of acidic conditions associated with these thresholds are likely to be in the order of decades.
- Results from the field columns suggest that threshold NPRs to avoid acidic drainage may be as low as 1.3 and 2.0. The reduced threshold NPR values (as compared to the humidity cell test results) are attributed to the reduced NP

depletion rate, as a result of lower flushing volumes and frequency under field conditions. However, these field column NPR threshold values should be viewed with caution as all oxidation products may not be released as they are produced, and the sulphate release rates may continue to increase as products build up and become available for release on subsequent flush events. Confirmation and use of these lower threshold NPR values would require continued test work (allowing for stabilization of oxidation rates), or dismantling and analysis of field columns.

- Given that ore stockpiles are anticipated to be milled quickly, and are not likely to
 be stored for more than one year before transport to an offsite mill, the predicted
 arsenic and zinc concentrations and the predicted delay until the onset of acidic
 conditions are unlikely to result in significant adverse affects on the environment.
- Potential impacts from limited metal leaching over the proposed ore stockpile turnover period can be estimated from humidity cell and field column leach rates, combined with the volume and grainsize of the stockpiled material, site temperatures, the tendency for water to flow through channels and bypass many of the rock surfaces potentially holding stored oxidation products, and the volume of precipitation that may contact the stockpile materials.

6.2 Implications for Waste Rock Piles

- The results from the humidity cell tests on the selected higher sulphide waste rock sample are likely to represent reasonable worst case results, rather than average or expected results. However, the range in NPR results of 0.1 to 137 for the 37 waste rock samples indicates the waste rock characteristics are highly variable.
- Based on the ABA database compiled to date, and a threshold NPR of 3 for separating PAG and NPAG material, gabbro and diabase material for the most part are likely to be NPAG, greywacke may be PAG or NPAG depending on the sulphur content, mafic volcanics are likely to be PAG, basalt material is highly variable but generally PAG and all ore and altered material are PAG. Note that the database is dominated by surface samples, and deeper materials may not maintain the indicated trends. Also note that the samples may have been biased to those containing visible sulphides.
- Extrapolating the field column results on coarse ore to the waste rock, and
 assuming the waste rock responds in a similar manner to field conditions,
 suggests that an on site waste rock pile would likely display slower NP release
 rates and similar sulphate release rates to those shown by the waste rock
 humidity cells. The lower NP release rates would be attributed to the less
 frequent and lower volume flushing experienced by waste material exposed in
 the field.
- These results indicate that Klohn's NPR threshold values to avoid acidic drainage, calculated from humidity cell results, of 3 and 7 for 22°C and 4°C respectively, are likely conservative due to the relatively large volumes of water

used in a humidity cell test as compared to field conditions. Lag time before the onset of acidic conditions, associated with these thresholds, are likely to be in the order of decades or more.

- Threshold NPRs to avoid acidic drainage calculated from coarse ore field columns may be applicable to waste rock, with similar caveats as mentioned above for ore stockpiles. Field column NPR thresholds of 1.3 and 2.0 should be viewed with caution as all oxidation products may not be released as they are produced, and the sulphate release rates may continue to increase as products build up and become available for release on subsequent flush events. Confirmation of lower threshold NPR values would require continued test work (allowing for stabilization of oxidation rates), or dismantling and analysis of field columns.
- Based on the geologic description of the ore deposit, Klohn (1996) anticipates that the waste rock will contain limited mineralization, such that metal leaching would not be significant. This was supported by humidity cell test on a composite waste rock samples (Klohn, 1998) at neutral pH values. However, any waste material that contains arsenic, such as waste rock adjacent to the ore, may have a potential to leach As at elevated concentrations, and should be assessed and/or managed accordingly. Zinc may also be a potential metal leaching concern if present in waste materials in similar quantities and form as the tested coarse and fine ore samples.
- Should acidic conditions eventually develop, leaching of other metals may occur.
 For example, copper values in the waste rock are noted as being slightly more elevated than ore samples.
- Under field conditions, a threshold NPR of 3 is considered a reasonably conservative means of classifying PAG waste materials to avoid the onset of acid generation. From the existing database, this appears to be consistent with a total sulphur cutoff of 0.2%.
- The onset of acidic conditions, and/or predicted metal leaching, may not necessarily result in significant adverse affects on the environment. Impact assessments are required to assess potential impacts, and typically take into account the mass of material maintained in a frozen state, volume and grainsize of the stockpiled material, site temperatures, the tendency for water to flow through channels and bypass many of the rock surfaces potentially holding stored oxidation products, and the volume of runoff and leachate that may contact the stockpile materials. MEMI recommends that impact assessments for specific site conditions be conducted to quantitatively define potential impacts from waste rock storage.

7.0 RECOMMENDATIONS

- ABA and metal content monitoring should continue during operations, particularly at deeper depths, to confirm if rock type trends identified from the current database remain consistent.
- Additional ABA and metal content sampling of the constructed camp pads should be undertaken to determine their susceptibility for ARD and metal leaching.
- Quantification of the low levels of mineralization in waste rock assumed by Klohn (1996) on the basis of the geological model should be confirmed. This, in conjuction with the lack of a metal leaching problem associated with the single, high sulphide waste rock kinetic test sample, is the basis for anticipating no significant metal leaching from waste rock. However, the limited metal database for waste rock samples precludes a quantitative assessment of arsenic and zinc content in waste materials at this time. For example, metals content may be elevated in waste in close proximity to the ore deposit. Metal content of waste materials should be confirmed by operational monitoring. Greater clarity of the potential quantity of waste rock that might contain elevated metal levels may be determined by review of the 7305 ICP's referred to the BHP geology report (1993).
- The field column tests on coarse ore should continue to determine if lower threshold NPR values may be valid for the site conditions. Alternatively, dismantling of the field columns should be conducted to analytically determine the amounts of soluble salts held in the columns and not flushed out under site conditions. This data could be extrapolated to the waste rock to assess whether lower threshold NPR values might be valid for identifying PAG waste rock quantities stored permanently on site.
- Since the onset of acidic conditions, and/or predicted metal leaching, may not
 necessarily result in significant adverse affects on the environment, impact
 assessments should be undertaken to assess potential impacts. These
 quantitative assessments typically take into account the mass of material
 maintained in a frozen state, volume and grainsize of the stockpiled material, site
 temperatures, the tendency for water to flow through channels and bypass many
 of the rock surfaces potentially holding stored oxidation products, and the volume
 of runoff and leachate that may contact the stockpile materials.
- Should quantitative impact assessments indicate potential for adverse long-term impacts, field column kinetic tests could potentially be conducted on waste material to confirm metal leaching rates and NPR thresholds for the different types of waste rock and varying composition with depth. However, on the basis of the field column tests conducted on coarse ore, waste rock columns would require several years to develop information supportive of lower threshold NPR values.

We trust this report meets your current requirements.

MEHLING ENVIRONMENTAL MANAGEMENT INC.

Per.

Reri Mehling, M.Sc., P.Eng. (B.C./N.W.T.)

Senior Consultant

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TABLES

	ABA Database by Rock Type							
	Rock Type	Description	Vert. Depth				CaCO3/tonn	
	- Gabbro & Dlabase	Desciption	(m) %	68	%SO ₄ -S	AP	NP N	NP I
RD-1	pabbro	adjacent to zone, 89VD04, 20.0-20.8m	0.8	0.24		7.5)	21.96939	44 5
RD-3	diabase	fresh, Mod Mg, 89VD14, 37.9-38.9m	30	0.29			51.94898	14.5
RD-9	dlabase	hanging wall, 90VD43, 319-320m	240	0.02			53.38776	52.8
RD-10	gabbro	fresh, 90VD66, 171-172.06m	240	0.13			10.35714	6.3
	2 gabbro	BH96-4, 3-23m	-	0.13	0.01	7	25	18
	gabbro	BH96-3, 3-40m		0.13	0.01	4	181	14
	gabbro	BH96-1, 25-52m	-	0.06	0.01	2	15	13
I II D	gaooro	count	-	7	0.011		10	19
		min		0.02		0.6	10.36	6.3
		max		0.29		9.1	53.39	52.8
		mean		0.16		5	28	23
lcanics		lilean		0.10	-	5	20	23
D-2	mafic volcanic	low grade, 1% As, 0.5% Po, 89VD05, 60.6-61.6m	30	0.74		23.4	35.66327	12.5
	matic volcanic	BH96-2, 11-12m	20	0.93	0.01	29	18	-11
10-15	IIIBAC VOICEINC	count		0.93	0.01	28	10]	-)1
		min		0.74		23.1	18	-11
		max		0.93		29	35.66	12.5
				0.84		26	27	12.5
ninunal	co 8 Blotite Cablet	mean		0.04		20	21	1
D-8	greywacke	footwall, 90VD44, 409.54-410.54m	360	0.17		E 2	20.44898	15 (
D-13	greywacke	fresh, 90VD62, 363-364m	360 260	0.17	-		15,79592	15,1
	biotile schist		200	and the second				
	biotile schist	BH96-2, 34-38m		0.11	-	3		19
116-21	DIOME SCHIST	BH96-2, 38-42m		0.07	0.01	- 6	211	19
		count		4			4= 70*00	
		min.		0.07			15.79592	8.0
		max		0.25		8	22	19
14.00	1 10 10 11	mean		0.15		5	20	15
	rphyry/Band Tuff	1 - 1 - 1 - 1 - 2 - 2 - 2 - 2 - 2 - 2 -	100	0.04		10	DD 4000	00.0
RD-4	band tuff	below zone, tr. Po, calcile, 89VD22, 171-172m	120	0.04	-	1.3		22.2
D-5	q-f porphy	footwall, 1% Po. 90VD31, 377.78-378.1m	325	0.02		0.8		27.1
8D-6	basali	hanging wall, 1% qtz stringers, 89VD10, 17.38-18.38m	10	0.01			42.70408	42.4
RD-7	basalt	footwall, 1% qtz stringers, 0.5% Po, 89VD10, 36.05-37.05m	12	0.25			30.07143	22.3
RD-11	basalt	fresh, tr. qtz stringers, 90VD62, 199-200m	150	0.12			19.64286	15.9
RD-12	f-parphy	fresh, 90VD62, 253-254m	180	0.01			39.23469	38.9
RD-14	basalt	country rock, 7-8% qtz-carb strg, 90VD62, 91.1-92.1m	35	0.22			84.78571	77.9
RD-15	basalt	country rock, 4-5% qtz stingers, 90VD72, 207.5-208.5m		0.57			40.73469	22.9
u KC-1	basalt	portal, working face		0.26	0.005	8		37
	basalt & gebbro	portal, N ramp		0.09	-	3		24
u KC-4	basalt & gabbro	portal, S ramp	11.000	0.49	-	15		7
u KC-25	basait	EBM-Ulu ARD-1 camp pads		1.49		47		-25
u KC-26	basait	EBM-Ulu ARD-2 camp pads		0.58	<0.01	18	19	1
и KC-27	basalt	EBM-Ulu ARD-3 camp pads		0.80	0.01	25		-2
u KC-28	basalt	EBM-Ulu ARD-4 camp pads		0.31	<0.01	10	23	13
KC-29	Qtz-feld porphyry + basall	EBM-Ulu ARD-5 camp pads		0.73	0.01	23	23	0
KC-31	basalt + minor QFP	EBM-Ulu ARD-7 camp pads		0.32	<0.01	10	19	9
		çoun		17				
		mlm		0.01		0		-25
		max		1,49		47		77.9
		mear		0,37		12	31	20
neralize	Marie Control of the							
	altered basalt	BH96-20, 117.9-118.9		0.15		5		25
	altered basalt	BH96-20, 166.8-167.8		0.28		8		17
	altered basalt	BH96-20, 167.8-169.2		0.93		29		4
ACCRECATE VALUE OF	altered basalt	BH96-20, 169.2-170.1		1.17		37		-4
	mineralized zone	BH96-20, 173.3-175.0		2.24		70		-40
	quartz vein	BH96-20, 184.4-185.9		1.60		50		-32
	altered sediment	BH96-20, 85.9-187.5		0.28		9		15
KC-16	altered graywacke	BH96-20, 198.9-200.8		0.22		7		9
KC-17	fresh interior of grab ore sample	ore zone surface		1.19				-14.19
KC-18	Alteration rind of grab ore sample	ore zone surface		1.28	0.03	40	26	-14.31
		coun	t	10				
		mln		0.15		-5		-40
		max		2.24		70		25
		mean	1	0.94	ţ.	29	26	-3
	specified		723					
	sulphide (pa+py)-rich	portal, N ramp		3.9				
KC-5	EBM-Ulu pulp 18701	portal material	1	2.6				-62
	EBM-Ulu pulp 18702	portal material		2,86	0.01	8.8	3 14	-74
	EBM-Ulu pulp 18703	portal material		3.1		98	8 21	-77
	EBM-Ulu pulp 18704	portal material		2.25	0.02	72	2 24	-48
	EBM-Ulu ARD-6	camp pads		0.3				-
			-					
KC-30		camp pads		0.20	D.01	1 6	6 19	7.
KC-30	EBM-Ulu ARD-8	camp peds	t		7 0.01	1	19	13
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ECHO BAY MINES LTD. Table 9: Ulu Project - Field Semple Weight (%g)

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