

LAC Minerals
2013 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, and Matt Hicks
Operators Present: Todd Duex, Gene Fuller, and Mark Tieszen
Others Present: Stan Michals, SD Game, Fish and Parks
Inspection Dates: June 18 and 19, 2013
Time In/Out: June 18, 2013: 11:20 am MDT to 1:00 pm MDT
June 19, 2013: 10:30 am MDT to 4:40 pm MDT

The annual environmental audit and field inspection of LAC's Richmond Hill Mine site occurred on June 18 and 19, 2013. The audit meetings and field inspections for both the Homestake Mine and LAC Mine were held concurrently on both days.

The Homestake meeting began at 9:30 am, followed immediately by the LAC meeting at 11:20 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 on June 18th and was completed the following morning on June 19th. The field inspection for the LAC's Richmond Hill Mine began at 10:30 am MDT on June 19th. Mike Cepak, Eric Holm, Mark Keenihan, Roberta Hudson, and Matt Hicks (DENR), Stan Michals (GF&P), and Todd Duex, Gene Fuller, and Mark Tieszen, (Barrick) participated in the LAC audit meeting.

Audit Meeting

Issues discussed during the audit meeting are summarized below:

1. 2012 Annual Performance Report: Gene Fuller provided the 2012 annual performance report. 2012 was a dry year with no precipitation in the month of September for the first time in 100 years. The official report with all associated documentation was submitted to the department in March 2013.

2012 Mine Pit Backfill Monitoring: Monitoring results are similar to previous years. Annual precipitation in 2012 was only 19.1 inches (drought conditions). Measurements from the barrel lysimeters show an average annual infiltration rate of 0.032 inches, as compared to 0.113 inches in 2011 (note: the design infiltration is 0.5 inch per year). Measurements from the basin lysimeters show an infiltration rate of 0.086 inches, as compared to 0.105 inches in 2011. Neutron logging and heat-dissipation unit (HDU) data continues to indicate the clay cap is performing as designed, limiting infiltration into the backfilled waste rock. Piezometer measurements showed piezometer #2 (south) was dry in 2012, compared to approximately 6.20 feet of water in 2011. Piezometer #1 (west) remained dry in 2012. Piezometer #1 has been dry since the installation of the cap. Oxygen levels measured below the cap remain under two percent, which shows the cap continues to limit oxygen. Impoundment temperature profiles remained stable.

2012 Leach Pad Monitoring: Effluent from Pad 1 flowed at an average rate of 7.61 gpm, for a total annual volume of 4 million gallons. In 2011, the rate and volume were 17.3 gpm and 8.9 million gallons. Effluent from Pad 3 flowed at an average rate of 7.56 gpm, for a total annual volume of 4 million gallons. In 2011, the rate and volume were 16.9 gpm and 8.7 million gallons. Trends in leach pad effluent chemistry remained stable. For Pad 1 during 2012, pH ranged between 5.0 and 6.6, and selenium values were from 0.048 to 0.088 mg/L. Pad 3 pH levels ranged from 5.1 to 6.6 and selenium values ranged from 0.018 to 0.050 mg/L.

2012 Reclamation Success Monitoring: Vegetative cover on the pit impoundment in 2012 averaged 52 percent live cover, 82 percent standing cover and 4 percent bare ground. Live cover on the pit impoundment decreased slightly (4%) as compared with 2011 values. Also, vegetative cover on the leach pads averaged 58 percent live cover, 79 percent standing cover and 4 percent bare ground in 2011. Live cover on the leach pads decreased (8%) as compared to with 2011 values. LAC also removed bug trees around the reclaimed areas in 2012.

2012 Aquatic Monitoring: According to Mr. Fuller, macroinvertebrate, periphyton and fish monitoring data continue to show healthy aquatic communities in Cleopatra Creek and Rubicon Gulch with no evidence of impacts related to mining.

2012 Water Quality: MW-9B, which is located to the northwest of the Pit Impoundment, continued to show declining sulfate levels which are now below 200 mg/L. Historically, sulfate in MW-9B steadily increased between 2006 and 2010, exceeding the 500 mg/l water quality standard from 2008 – 2009. However, since October 2009, sulfate levels in this well have steadily declined. By 2011, the sulfate levels were below 300 mg/L.

Gene Fuller said that water quality data for MW-26 (deep bedrock well in South Gulch), indicated that sulfate levels are dropping and are currently below 500 mg/l, pH values are stable and currently at 4.5 su.

In terms of general water quality trends, Mr. Fuller characterized Spruce Gulch as, “mostly stable” to “improving”. In addition, no impacts have been detected in Cleopatra Creek from the Richmond Hill Mine. However, during September 2012, increased flows as well as increased TDS, selenium and nitrate levels were noted at OEA-1 on Cleopatra Creek. DENR was notified at the time. Impacts lasted only 2 to 3 weeks, as water quality subsequently improved abruptly in October. After contacting Wharf Resources (mine operation upstream of OEA-1), and after an investigation by DENR, it is unknown if the selenium and nitrate increases were due to discharges at Wharf or others, drought related, or a combination of discharges and drought.

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

2012 Water Treatment: Review of the Annual Performance Report concluded with an overview of water treatment statistics. LAC treated and discharged 19.1 million gallons through the Reverse Osmosis (RO) unit and Bio Plant in 2012. In addition, LAC collected and treated and subsequently discharged 1.75 million gallons from South Gulch collection gallery.

2. Water Balance and LDCRS Update. As of June 3, 2013, LAC has approximately 22.75 million gallons stored in the process area ponds (note: LAC gained approximately 8 million gallons in May 2013 due to heavy precipitation).
3. Review of the 2012 Audit Letter and Inspection Report: The following item from the 2012 audit letter and report was discussed:

Item #3: LAC plans to submit its updated reclamation plan, the release of liability petition, and the postclosure plan before the end of the year. The performance criteria pursuant to the conditions of the 1994 permit amendment will be included in the release package. DENR staff mentioned that Deadwood Standard was planning to submit its mine permit application in the fall and the Powertech large scale uranium mine permit hearing would also begin in the fall. These matters could vie for DENR staff time in reviewing these documents. LAC said it would wait until December to submit the documents (note: LAC will submit the documents in December, 2013 or January, 2014 since the Powertech hearing was continued).

4. Review of Permit Conditions: The following technical revision conditions were discussed.

April 18, 2011 Technical Revision, Wildlife Protection Condition No. 1: LAC installed textured liner in all corners of the Pregnant Pond for wildlife egress. Approximately 80% of the pond was lined in textured sheet.

April 21, 2011 Technical Revision, Sludge Disposal Condition No. 1: LAC is doing required TCLP analysis on all new sludge sources. The company will continue TCLP analysis if there is a change in sludge sources or once a year.

Also LAC said it submitted the as-built drawings for the new Sludge Pond in the former Barren Pond as required under Plans and Specifications Condition No. 1 (note: the as-built drawings were submitted on November 22, 2011).

5. Planned 2013 Activities: LAC presented a list of 2013 activities in various stages of completion, as follows:
 - a. New Reverse Osmosis unit and MMF system (new tanks installation) – These activities have been postponed. LAC wants to replace the current Reverse Osmosis unit with a new energy efficient model.
 - b. TK 400 air piping and blower. This project is done.

- c. TK 200 Tank rebuilding. This project is done. The tank was refurbished after old media in the tank plugged up which resisted flow and caused damage to the tank. New media was added to the tank to prevent future plugging.

At this point, we took a lunch break at 11:55 am MDT. The meeting resumed at 12:40 pm MDT. We continued our discussion on the status of planned 2013 activities:

- d. FD-1 manhole, instrumentation and pipeline (see June 13, 2013 Technical Revision). This project was substantially completed in September.
 - e. Old Sludge Pond reclamation. Postponed until 2014 or 2015, depending on funding. LAC still plans to use the previously approved reclamation plan, but it is still considering using a synthetic liner.
 - f. Removal of defunct tanks, equipment and piping in original process plant. This project is done, as all tanks, equipment, etc. have been removed from the plant.
6. Spring 2013 Runoff Events. LAC reported the road to the OEA-1 sampling site washed out during the May 2013 rain events. The road is not on LAC property. (Note: The road has been subsequently repaired).

The Retention Pond overflowed twice during the May events. The discharges met water quality standards, with the pH at 7.5. The flow was up to 1600 gpm at 001, with approximately 1000 gpm being pumped and 200 to 300 gpm discharged down the spillway. The Retention Pond spillway held up well during the event.

LAC added there was also some minor erosion around the mine site during the May storm events. These areas were repaired as necessary. They also noted an increase in acidity in South Gulch during the high flows.

7. Stormwater Pond Reline. LAC still plans to reline the Stormwater Pond in 2015. The pond will be relined in its current size, since there are no plans to reduce the pond capacity. An LDCRS system may be installed below the new primary liner. LAC will also remove trees around the Stormwater Pond to prevent them from falling onto the new liner and provide better access during the relining project. (Note: The tree removal has been completed).
8. Update on AMD Mitigation. LAC is not planning any changes for AMD mitigation. Water quality in MW-26 and South Gulch is stable and possibly improving. LAC feels that any impacts in the South Gulch area and MW-26 are primarily from natural sources.
9. Update on Haul Road. LAC said there is no change in its plans for the haul road. Last year, LAC personnel stated the entire haul road is now owned by Barrick, and the road will be left in place during the 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 unless another entity such as a local road district agrees to assume long term liability for it.

10. Robert Fowler Litigation Update. Todd Duex reported the judge said Mr. Fowler (Viable Resources) has a reversionary interest for property in process area. If LAC no longer requires the use of the land and wishes to divest itself of the land, the land would go back to him.
11. Weed Control. Gene Fuller said that Mid Dakota would be out this summer spraying weeds along the powerlines. He mentioned that pine trees were dying in “patches” in the Turnaround area. Holes in the bark indicated a probable bark beetle infestation.
12. Old Sludge Pond Reclamation: LAC mentioned it was still considering modifying the reclamation plan for the old sludge pond by changing the soil liner to a geosynthetic liner. The current reclamation plan for the pond requires a minimum of 2.5 feet of soil cover and 6 inches of topsoil, with a minimum 1.5% grade to facilitate drainage of surface water off the sludge disposal area. DENR officials said they would need to review any proposed changes to the reclamation plans before approving a modification to the sludge pond reclamation.
13. Old Pregnant Pond Liner: LAC is still trying to get rid of the old Pregnant Pond liner that was removed during the relining project last year. They are having a difficult time hauling it away. (Note: The liner was shredded and removed in August).

The meeting portion of the audit ended at 1:05 pm MDT. The group then began the Homestake audit field inspection, which continued the following morning (June 19). 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 10:38 am MDT.

Spruce Gulch: The first stop on the field inspection was the Spruce Gulch area along the old haul road at 10:39 am MDT.

Vegetative cover in Spruce Gulch is now in its seventeenth growing season and continues to be very good to excellent. No new erosion was noted. LAC established four vegetation transects in Spruce Gulch (SGHER#1, SGHER#2, SGHER#3, and SGHER#4) and collected data in 1997, 1998, 1999, 2000, 2005, and 2010. Live vegetative cover in SGHER#1 varied from a low of 53 percent in 1999 to a high of 84 percent in 2010 and averaged 64 percent over the monitoring period. Live vegetative cover in SGHER#2 varied from a low of 62 percent in 2000 and 2005 to a high of 82 percent in 1997 and averaged 71 percent over the monitoring period. Live vegetative cover in SGHER#3 varied from a low of 45 percent in 1997 to a high of 60 percent in 2005 and averaged 52 percent over the monitoring period. Live vegetative cover in SGHER#4 varied from a low of 59 percent in 1997 to a high of 79 percent in 2010 and averaged 69 percent over the monitoring period. The overall average of 64 percent for the monitoring period exceeds the 40 percent cover standard established for the mine site.

Average vegetative cover in the area evaluated was estimated at 60 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 brome grass, slender and western wheatgrass, hard fescue, white dutch clover, blanket flower, rocky mountain

penstemon, and blue flax. Other species noted include black medic, goatsbeard, slenderleaf collomia, moss, and yarrow. Hard fescue and kentucky bluegrass were the dominant species. Noxious and other weeds noted include St. John's wort and houndstongue.



Photo 1. Spruce Gulch looking west towards pit impoundment.

LAC collected containerized tree and shrub survival data from 1997 through 2001, 2003, 2005, 2007, 2009, 2010, and 2012. 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 46 percent in 2007 to a high of 94 percent in 1997. There was a slight decrease in survival rates from 52 percent in 2010 to 49 percent in 2012 due to an error in the baseline count of birch and aspen in the transition zone.

In the shrub seeded areas, LAC established a macroplot in the birch zone. LAC collected data from this macroplot from 1997 through 2001, 2003, 2005, 2007, 2009, 2010, and 2012. Total shrubs per acre in the macroplot transect during the nine year monitoring period varied from a low of zero in 2007 and 2009 to a high of 6,635 in 1996 and 1997. In 2012, one chokecherry was noted.

LAC established two belt transects in upper and lower Spruce Gulch in 2000 and 2001. Transect data was collected in 2000, 2001, 2003, 2005, 2007, 2009, 2010, and 2012. In transect 1, total shrubs per acre varied from a low of 944 in 2001 and 2012 to a high of 1,670 in 2000. The 944 shrubs/acre in 2012 was a decrease from the 1,162 shrubs noted in 2010. In transect 2, total shrubs per acre varied from a low of 436 in 2010 to a high of 3,848 in 2001. The 581 shrubs per acre in 2012 was an increase from the 436 shrubs per acres in 2010.

For tree and shrub transplants, LAC collected data from three transplant areas from 1997 through 2001, 2003, 2005, 2010, and 2012. LAC also collected data from the second transplant area in 2007. Survival rates varied between 59 percent and 84 percent in the three transects in 2012.

Trees and shrubs noted during the inspection include willows, ceanothus, serviceberry, aspen, birch, ponderosa pine, bur oak, black hills spruce, chokecherry, woods rose, and oregon grape. All trees and shrubs appear to be healthy and well established.

We also noted various desirable volunteer species invading along the edge of the reclaimed area.

South Toe Drain: The next stop on the inspection was the south toe drain area of the Pit Impoundment. We arrived at 10:55 am MDT. Vegetation in this area is discussed in the Pit Impoundment section of the report.

Turn Around Area: We arrived at the Turn Around area at 11:26 am MDT.

The area is in its twenty-first growing season. LAC established two vegetation transects in this area, TA#1 and TA#2, and collected data in 1997, 1998, 1999, and 2000, and during the comprehensive vegetative survey in 2005. Live vegetative cover in TA#1 varied from a low of 34 percent in 1997 to a high of 62 percent in 2005 and averaged 43 percent over the five year monitoring period. Live vegetative cover in TA#2 varied from a low of 46 percent in 1998 to a high of 74 percent in 2005 and averaged 59 percent over the five year monitoring period. The overall average of the two transects is 51 percent and meets the 40 percent cover standard established for the mine site.

Average 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 kentucky bluegrass, western wheatgrass, hard fescue, white dutch clover, and blue flax. Other species noted include black medic, oxeye daisy, bedstraw, moss, and yarrow. Hard fescue was the dominant species. Noxious and other weeds noted included spotted knapweed.

The area has become a mixed ponderosa pine forest with some black hills spruce, aspen, birch and assorted shrubs. We noted numerous small pine trees likely killed by bark beetles (“ips”). For the most part the dead trees ranged from 8 to 12 feet in height. We noted the beetle holes in the tree bark and we pulled off pieces of bark to inspect the damage done by the beetles. Shrubs and other understory species noted include serviceberry, juniper, and chokecherry. LAC has not collected any tree and shrub data in this area.



Photo 2. Dead bark beetle trees in Turn Around area.



Photo 3. Bark beetle or “ips” (next to the head of the ant) on a piece of bark from an affected tree. Note the beetle channel marks on the bark

Pit Impoundment: The inspection group arrived at the top of the Pit Impoundment at 11:44 am MDT. Vegetative cover on the pit impoundment is now in its eighteenth 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 1997 through 2012. Live vegetative cover in PI#1 varied from a low of 50 percent in 2002 to a high of 79 percent in 2003 and averaged 63 percent over the 16 year monitoring period. Live vegetative cover in PI#2 varied from a low of 46 percent in 2002 to a high of 72 percent in 2003 and 2004 and averaged 58 percent over the 16 year monitoring period. Live vegetative cover in PI#3 varied from a low of 43 percent in 2002 to a high of 71 percent in 2003 and averaged 56 percent over the 16 year monitoring period. Live vegetative cover in PI#4 varied from a low of 38 percent in 2009 to a high of 57 percent in 2004, 2005, and 2007 and averaged 50 percent over the 16 year monitoring period. The overall average of 57 percent for the 16 year monitoring period exceeds the 40 percent cover standard established for the mine site.



Photo 4. Top of Pit Impoundment, looking west.

Average 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, white dutch clover, blue flax, and rocky mountain penstemon. Other species present include black medic, goatsbeard, assorted vetches, moss, field pussytoes, violets, and yarrow. Noxious and other weeds present include St. Johns wort, canada thistle, tansy, and houndstongue. A small patch of raspberry was noted near the toe drain area. LAC also removed a small aspen seedling from the impoundment during the inspection. The company needs to continue to remove pine trees from the impoundment and spray ceanothus.

At this point, we took a lunch break at 12:05 pm MDT. The inspection resumed at 12:45 pm MDT.

Water Treatment Plant (WTP): At 12:50 pm MDT, we entered the WTP. The old carbon tanks (more recently used as water treatment tanks) have been removed. Parts of the main floor of the process building are being remodeled, and a new laboratory and bathroom is being constructed.

The reverse osmosis (RO) unit in the trailer on the north side of the building is still in use, but the new RO and RO feed tank will be in the main building. The old RO will be replaced in the near future. The biological plant installed in 2011 continues to operate.



Photo 5: Interior of Process Plant after carbon tanks removed.

Pregnant Pond and New Sludge Pond: At 1:15 pm MDT, we walked outside the WTP and checked the Pregnant Pond and new Sludge Pond (old Barren Pond). LAC completed relining the Pregnant Pond in 2012. Most of the Pregnant Pond was lined with textured liner. LAC also installed a new Pregnant Pond pump house with two pumps (for redundancy). On the west side of the pond, the slope above the pond liner was regraded and seeded. Jute netting was placed on the slope to aid in vegetation establishment. Some first season growth was noted.



Photo 6. Relined Pregnant Pond.

FD-1: At 1.29 pm MDT we stopped by the FD-1 area. A construction crew was at the FD-1 site and was in the process of installing a platform over a new manhole. Later, a new pump house will be built over the manhole. The pump will be operated remotely. A new buried pipeline from FD-1 is being built along the access road to the Pregnant Pond. A buried discharge pipeline is also being constructed in the same trench and will run from the Water Treatment Plant to the frog pond. Treated water will be discharged into the upper end of the frog pond to the south of the new pump house. The pipes will be buried below the frost line to prevent freezing during wintertime operations.



Photo 7. New platform installed over FD-1.

As we left the FD-1 area, we noted new wattles and riprapped channels in the Process area. LAC installed these structures to improve erosion control in the area.

V-Notch Area: We arrived at the V-Notch area at 1:53 pm MDT. Vegetative cover on the V-Notch area is in its sixteenth growing season and continues to be very good to excellent. No new erosion was noted. LAC Minerals established two vegetative transects in the V-Notch (VN-1 and VN-2) and collected vegetation data from the transects from 1997 through 2000 and in 2005 and 2010. Live vegetative cover in VN-1 varied from a low of 45 percent in 1997 to a high of 83 percent in 1999 and averaged 69 percent over the monitoring period. Live vegetative cover in VN-2 varied from a low of 49 percent in 1997 to a high of 75 percent in 2010 and averaged 64 percent over the monitoring period. The overall average of 67 percent for the monitoring period exceeds the 40 percent cover standard established for the mine site.

Average 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, western and slender wheatgrass, hard fescue, white dutch clover, and blue flax. Other species noted include smooth brome grass, black medic, assorted vetches, and yarrow. Hard fescue was the dominant species. Noxious and other weeds present include St. Johns wort.

LAC collected tree and shrub survival data in four transects in 1997, 1998, 1999, 2000, 2001, 2002, 2003, 2005, 2007, 2009, 2010, and 2012. After no trees and shrubs were noted in 2010, two serviceberry shrubs were noted.

LAC also collected data from a shrub transect in 2012. A total of 10 shrubs were found in the transect for a density of 726 shrubs per acre which is a decrease from the 13 shrubs and 944 shrubs per acre density in 2010. Also, LAC collected data on tree and shrub transplants in 2012. In the south facing slope transect, 7 out of 20 transplants survived for a survival rate of 35 percent. No transplants survived in the north facing slope transect.

Trees and shrubs noted during the inspection include raspberry, serviceberry, juniper, ponderosa pine, bur oak, snowberry, chokecherry, and woods rose.

Some water was noted in the drainage channel during the inspection. Also, some minor acid seeps were noted along the cut in the western end of the V-Notch.



Photo 8. V-notch area 2013.

Limestone Quarry and Pad 3: The final stop on the field inspection was at the Limestone Quarry and the north corner of Pad 3 at 2:24 pm MDT. We did a very brief inspection of the Limestone Quarry. We then proceeded to the top of Pad 3. Vegetative cover on Pad 3 is in its sixteenth growing season and continues to be very good to excellent. No new erosion was noted. LAC established two vegetation transects on Pad 3 (Pad 3-2 and Pad 3-3) and collected data from 1998 through 2012. Live vegetative cover in the Pad 3-2 transect varied from a low of 33 percent in 1998 to a high of 67 percent in 2008 and averaged 57 percent over the 15 year monitoring period. Live vegetative cover in the Pad 3-3 transect varied from a low of 46 percent in 2002 to a high of 72 percent in 2011 and averaged 60 percent over the 15 year monitoring period. The overall average of 58 percent for the 15 year monitoring period exceeds the 40 percent cover standard established for the mine site.

Average 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, white dutch clover, and blue flax. Other species present include black medic, assorted vetches, and moss. Noxious and other weeds present include tansy. LAC needs to continue to spray ceanothus on the pad.



Photo 9. Reclaimed areas below Pad 3. Process Plant and Pad 1 are in upper right of the photo.

Closeout Meeting: The field portion of the LAC audit ended at 2:50 pm MDT. At 3:12 pm MDT, we drove to the Homestake office in Central City for the closeout meeting. Regarding the Richmond Hill Mine, the department mentioned weed spraying, especially for St. John's wort. LAC verified that the as-built drawings for the new Sludge Pond were submitted to the department on November 21, 2011. Finally, LAC said that the release petition package will be submitted in late 2013.

The closeout meeting and the mine permit audit ended at 3:40 pm MDT.

Comments/Recommendations

1. LAC continues to do a very good job of reclamation and site-wide environmental management.
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.

4. LAC needs to either submit a technical revision to reline the Stormwater Pond or include the relining plan in the updated Reclamation Plan if the pond is changed from the previously approved design.
5. LAC will need to submit a technical revision if HDPE liner is used as part of the cover over the sludge in the old Sludge Pond during final reclamation.

Inspectors: _____ \s/ _____

Date: December 10, 2013