

**Carr, Chris A EMPR:EX**

MP00144

**From:** Carr, Chris A EMPR:EX  
**Sent:** March 1, 2006 11:08 AM  
**To:** Morgan, David EMPR:EX; Rothman, Stephen EMPR:EX  
**Cc:** Milligan, Bruce EMPR:EX; Booth, Richard EMPR:EX  
**Subject:** RE: PolleyResponseNewFormatSection6&10.xls

Please see my comments for next audit (Code, Part 10).



PolleyResponse  
wFormatSector

-----Original Message-----

**From:** Morgan, David EMPR:EX  
**Sent:** February 27, 2006 3:00 PM  
**To:** Carr, Chris A EMPR:EX  
**Subject:** PolleyResponseNewFormatSection6&10.xls

<< File: PolleyResponseNewFormatSection6&10.xls >> Here are Mt Polley's responses to the September Audit in the new EXCEL format. You can sort and add comments in column I for Steve and the audit team if you wish.

HSR Code Element	HSR Code Description and Original Audit Comments	HSR Code Section	Max Points	Points Earned	Managers Response/Action	Delegated Person Responsible	Completion Date	Completion Date
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Comments Feb 28, 2006 by CAC

**Element 10: Mine Plans**

Element 10: Mine Plans	<p>Does the mine have a permit authorizing the work from the chief inspector? Does it include information on the following</p> <ul style="list-style-type: none"> <li>• surface or underground development or production for coal and mineral mines, or major expansions or major modifications of existing producing coal and mineral mines of the buildings available on site,</li> <li>• underground exploration requiring excavation, large pilot projects, bulk samples, trial cargos or test shipments</li> <li>• has work proceeded without the chief inspector granting a permit or authorization</li> </ul> <p><b>Part 10.1.2</b>  <b>Comments: Mining of overburden in SE corner of Wight Pit (NE Zone). Design not submitted to Geo Tech in Victoria. Design due April 30, 2005 but not received. Work still in progress, but mining is taking place.</b></p>	10.1.2	5	3	Discussions are ongoing with Geotechnical Consultants to resolve this issue.( Golder & Associates)			We are still waiting for the pit design report for the southeast quadrant of the northeast zone pit (November 1, 2004 permit condition). The design report is required prior to mining this area. I suspect mining has already commenced.
Element 10: Mine Plans	<p>Does the mine have a plan that has the relevant information as requested by the code?</p> <ul style="list-style-type: none"> <li>• Baseline information</li> </ul> <p><b>Part 10.1.4(1) and (2)</b>  <b>Comments: Questions from MEMPR, Victoria, have not been answered yet, as mine has not received the request yet.</b></p>	10.1.4(1)(2)	5	3	Plans are on file			The baseline information was likely provided prior to start of mining and would have been reviewed at that time.

Element 10: Mine Plans	Does the mine plan have the requirements of Part 10.1.4(3)(f) • designs and details for dumps, open pits, impoundments, underground workings including areas that may be affected by subsidence, stockpiles, processing facilities, water management structures, water storage and/or water treatment facilities, haulage roads, road construction and significant transportation or utilities infrastructure, compatible with environmental protection, reclamation and mine closure <b>Part 10.1.4(3)(f)</b> <b>Comments: Questions from MEMPR, Victoria, have not been answered yet, as mine has not received the request yet.</b>	10.1.4(3)(f)	5	3	Plans are on file			Question from MEMPR was likely with respect to design of southeast zone waste dump. I understand that the waste is to be dumped into the flooded Cariboo Pit. This operation could be checked for safety.
Element 10: Mine Plans	Does the mine plan have the requirements of Part 10.1.4(3)(g) • designs for material handling and waste disposal procedures  <b>Part 10.1.4(3)(g)</b> <b>Comments: Questions by from MEMPR, Victoria, have not been answered yet, as mine has not received the request yet.</b>	10.1.4(3)(g)	5	3	Plans on file. Waste disposal procedures for the Wight Pit dump are currently being prepared for submission			Received procedures for dump construction and monitoring for the East RDS. This was submitted as part of variance request that is expected to be approved by the Chief Inspector.
Element 10: Mine Plans	Does the mine plan have the requirements of Part 10.1.4(3)(h) • salvaging and stockpiling of surface soils and overburden materials,  <b>Part 10.1.4(3)(h)</b> <b>Comments: Yes, but the toe of the Bell Pit dump has not been adequately stripped on of Growth Medium.</b>	10.1.4(3)(h)	5	3	Growth medium continues to be stock piled for future use. There is a significant amount associated with the Wight Pit development. The mine is reviewing the Bell Pit dump toe as noted			Is the soil overburden waste, dumped in the north end of the East RDS, suitable for reclamation material and will it be available/accessible as reclamation material? This is more a question for the reclamation section to answer.



Element 10: Mine Plans	Does the mine plan have the requirements of Part 10.1.4(3)(i) • source, use and water balance for any water required in the operation,  <b>Part 10.1.4(3)(i)</b> <b>Comments: Yes, the mine has a good spread sheet with this information.</b>	10.1.4(3)(i)	5	5			
Element 10: Mine Plans	Does the mine plan have the requirements of Part 10.1.4(3)(j) • overall site water balance,  <b>Part 10.1.4(3)(j)</b> <b>Comments: Yes, the mine has a good spread sheet with this information.</b>	10.1.4(3)(j)	5	5			
Element 10: Mine Plans	Does the mine plan have the requirements of Part 10.1.4(4)(b) Plan for Environmental Protection that includes • (b) erosion control and sediment retention,  <b>Part 10.1.4(4)(b)</b> <b>Comments: Yes they have a plan but implementation is lacking, comment received was "will get to it after production is started"</b>	10.1.4(4)(b)	5	3	Implementation has proceeded since start up. Perimeter ditches around the Wight Pit have been established. The area east of the Wight Pit is being stabilized currently. Additional work is still required, it will be completed on an ongoing basis and prior to spring breakup		Erosion control is required prior to mining/ground disturbance. Ditches and sediment control ponds should be designed. Check records on site. Probably should check into this more closely to see how sediment is being controlled.
Element 10: Mine Plans	Does the mine have an operational reclamation plans for the next five years that shows the progressive development of structures.  <b>Part 10.1.4(6)</b> <b>Comments: Yes, however we did not see the plan.</b>	10.1.4(6)	5	3	Plans are on file		I suggest this be checked with the reclamation section to see if they have a copy of the plans and that this work is covered by the permit.

**Element 10B: Design Standards**

Element 10B: Design Standards	Are the impoundments, water management facilities and dams designed in accordance with the criteria provided in the Canadian Dam Association, Dam Safety Guidelines?  <b>Part 10.1.5</b> <b>Comments: Consultants designs meet the CDA guideline.</b>	10.1.5	5	5			
Element 10B: Design Standards	Are the dumps designed in accordance with the Interim Guidelines of the British Columbia Mine Waste Rock Pile Research Committee?  <b>Part 10.1.6</b> <b>Comments: Yes, Meets Interim Guidelines of the British Columbia Mine Waste Rock Pile Research Committee</b>	10.1.6	5	5			
Element 10B: Design Standards	Are the dumps designed in a design so as to allow for re-contouring such that final reclamation is consistent with the approved end land use?  <b>Part 10.1.7</b> <b>Comments: Some of the dumps will be very costly to reclaim unless the construction method is revised, the 2 to 1 slopes will exceed the present logged area when the start dozing the final slope.</b>	10.1.7	5	4	As previously noted the dump plan for the Wight Pit over burden and rock is being prepared. It would allow for travel below the dump and recontouring. This plan will be submitted ASAP. (see above)		Dump plan has been received as part of variance request for haul road use.
Element 10B: Design Standards	Are the Tailings impoundments, water management facilities, dams and waste dumps designed by a professional engineer?  <b>Part 10.1.8</b> <b>Comments: Yes, design by the independent consultant, including annual dam raises.</b>	10.1.8	5	5			

Element 10B: Design Standards	Are there plans for the prediction, and if necessary, the prevention, mitigation and management of metal leaching and acid rock drainage shall be prepared in accordance with the Guidelines for Metal Leaching and Acid Rock Drainage at Minesites in British Columbia?  <b>Part 10.1.9</b> <b>Comments: Yes this is an ongoing project.</b>	10.1.9	5	5				
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**Element 10C: Departure from approval**

Element 10C: Departure from approval	Has the owner, agent or manager notified the chief inspector in writing of any intention to depart from the mine plan and reclamation program authorized under sections 10.1.1 or 10.1.2 of this code to any substantial degree. • Has the manager received the written authorization of the chief inspector prior to implementing the proposed changes?  <b>Part 10.1.11</b> <b>Comments: Yes, Applications for mine plan changes are submitted for approval.</b>	10.1.11	5	5				
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**Element 10D: Operation**

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Element 10D: Operation	<p>Did the operation of a tailings or water management facility commence prior to an "as-built" report prepared by a professional engineer certifying that the facility was designed and constructed according to section 10.1.5 of this code was submitted to the chief inspector and a permit to operate the facility was received.</p> <p><b>Part 10.5.1</b> <b>Comment: Construction of the dam is on-going and as-built information reported in annual dam safety inspection report supervised by a P.Eng, from the independent consultant.</b></p>	10.5.1	5	5			
Element 10D: Operation	<p>Does the mine have an Operation, Maintenance and Surveillance (OMS) manual.</p> <ul style="list-style-type: none"> <li>• Was this manual prepared and provided to an inspector and to all employees involved in the operation of a major dam or major impoundment, prior to commissioning.</li> <li>• Is the manual revised regularly during operations, decommissioning and closure of the structure.</li> </ul> <p><b>Part 10.5.2</b> <b>Comments: Last update December 2004. The OMS manual is provided to supervisors but not the employees working on the dam construction involved in operation of facility.</b></p>	10.5.2	5	4	As noted, The OMS manual has been prepared. Prior to 2006 construction the OMS Manual will be made available to employees in the foreman's office.		Check training records.



Element 10D: Operation	Has the manager submitted an annual dam safety inspection report prepared by a professional engineer on the operation, maintenance and surveillance of the tailings and water management facilities and associated dams to the chief inspector?  <b>Part 10.5.3</b> <b>Comments: Report on 2004 inspection received February 2005. Next Dam Safety Inspection report due July 31, 2006. Dam Safety Review to be carried out in 2006.</b>	10.5.3	5	5			
Element 10D: Operation	Are dumps operated and monitored in accordance with the Interim Guidelines of the British Columbia Mine Waste Rock Pile Research Committee.  <b>Part 10.5.4</b> <b>Comments: Waste dump construction and monitoring procedure due March 31, 2005. Work is in progress to produce this.</b>	10.5.4	5	4	Dumps are monitored as noted previously. The procedure will be submitted as noted in Part 10.1.6		Dump monitoring procedure received for the East RDS. Should confirm that there are procedures in place for other waste dumps at the mine, particularly dumps incorporating waste such as soil stockpiles.
10	TOTAL		95	78	82%		