

Mackenzie Valley Land and Water Board 7th Floor - 4910 50th Avenue P.O. Box 2130 YELLOWKNIFE NT X1A 2P6 Phone (867) 669-0506 FAX (867) 873-6610

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MACKENZIE VALLEY ENVIRONMENTAL IMPACT REVIEW BOARD

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Mackenzie Valley Land and /ater Board

7th Floor - 4910 50th Avenue • P.O. Box 2130 YELLOWKNIFE, NT X1A 2P6 Phone (867) 669-0506 • FAX (867) 873-6610

September 17, 2003

File: MV2002L2-0019

Distribution List

Dear Sir/Madame:

North American Tungsten Corporation Ltd., MV2002L2-0019
Estimates of Reclamation Cost Liability, Cantung Mine

Attached for your review and comments is the aforementioned review of the Estimates of Reclamation Liability commissioned by the Board.

Please submit your comments in writing by **September 26**, 2003 quoting Water Licence MV2002L2-0019.

If you have any questions regarding the Water License, contact me at (867) 669-0506 or email mvlwb.com.

Yours sincerely,

Laurie Cordell Regulatory Officer

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Attachment



Мемо

To

Laurie Cordell, Regulatory Officer

Mackenzie Valley Land and Water Board

From

Larry Connell

Tel

(604) 473-5308

File No. YX00643

Water License N3L2-0004

Fax

(604) 294-4664

CC

Date

11 September 2003

Subject

CanTung Mine -- Estimates of Reclamation Liability

AMEC Earth & Environmental Limited (AMEC) was asked by the Mackenzie Valley Land and Water Board (MVLWB) staff to review the previous estimates of reclamation liability for the CanTung Mine site, and to prepare a "blended estimate" that takes into consideration the wide range in proposed reclamation activities, unit rates, and quantities that were used in the preparation of these previous estimates.

The AMEC reclamation liability "blended estimate" was drawn from the various estimates previously submitted to the MVLWB, specifically the estimates prepared by North American Tungsten Corporation, Gartner Lee Limited and by Brodie Consulting. AMEC reviewed the reclamation components (line items) included in each of the estimates, the differing reclamation activities proposed, the quantities used and the differing unit rates used in each of the estimates and then used its professional judgement to prepare a revised estimate. AMEC did not do any additional field or engineering work in the preparation of this "blended estimate".

Table 1 presents, in a summary form, a comparison of the reclamation liability estimates prepared by North American Tungsten Corporation Ltd (Cantung Mine Abandonment and Restoration Plan, submitted to the MVLWB, dated July 2003), Gartner Lee Limited (Cantung Mine Site Phase I Environmental Site Assessment and Environmental Liability Assessment, prepared for the Department of Indian Affairs and Northern Development, dated February 2003) and Brodie Consulting Limited (Cantung Mine Reclamation Cost Estimate, prepared for the Department of Indian Affairs and Northern Development, dated November 2002) with the AMEC "blended estimate". The breakdown of the AMEC "blended estimate" is presented in Appendix A.

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Mackenzie Valley Land and ter Board
Review of Reclamation Costimates for the Cantung Mine

Cantung Mine September 11, 2003



Table 1: Comparison of Reclamation Liability Estimates Made for the CanTung Mine Site

	Estimated De	-141 1 1-1-1	the fresh Con	Turne Miles Olto	
		clamation Liabi	ity for the Gan	ung Mine Site	Component .
Component	AMEG	NATL 2003	GL 2003	Brodle 2003	Applicable to
	Blended Estimate	Estimate	Estimate	Estimate	Brodie Estimate
1 Flat River Tailings	\$40,000	\$23,250	\$119,250	\$102,500	Open Pit
2 Tailings Pond No. 1 & 2	\$53,250	\$87,630	\$59,500	\$34,906	Underground Mine
3 Old Lagoon	\$19,240	\$ 0	\$19,240	\$4,296,543	Tailings
4 Tailings Pond #3	\$611,200	\$188,396	\$833,950	\$113,264	Rock Piles
5 Tallings Pond #4	\$177,420	\$12,350	\$240,420	\$1,587,580	Buildings and Equipment
6 Tailings Pond #5	\$107,000	\$53,940	50	5 372,091	Chemicals and Soil Management
7 Old Landfill	\$10,000	\$28,500	\$18,500	\$1,500,000	Water Management
8 Active Landfill	\$30,000	\$26,970	\$49,500		
9 New (Demolition) Landfill	\$35,000	\$26,970	\$36,000		
10 Upper Scrap Yard	\$67,250	\$0	\$ 72,500		
11 PCB's	\$20,000	\$20,000	\$145,000		
12 Reagents/Chemicals/Batterles	\$25,000	\$1,000	\$100,000		,
13 Used Oil	\$25,000	\$5,000	\$50,000		
14 Industrial Buildings	\$1,250,000	\$260,000	\$1,875,000		j.
15 Hydrocarbon Tanks and Pipelines	\$100,000	\$100,000	\$100,000		
16 Housing in Townsite (75 Buildings)	\$1,465,000	\$120,000	\$475,000		
17 Roadways and Powerlines	\$68,535	\$2 3,535	\$11,250		
18 Hydrocarbon Contaminated Soil	\$240,000	\$50,000	\$670,000		İ
19 Metal Contaminated Soil	\$85,000	\$60,000	\$160,000		
20 Underground Mine	\$55,000	\$51,000	\$70,000		
21 Open Pit	\$11,500	\$10,000	\$122,500		ļ
22 Waste Rock and Ore Piles	\$15,000	\$13,485	\$15,000		
23 Land Reclamation and Revegetation	\$100,000	\$59,000	\$1,60,000		ļ.
24 EEM Program	\$75,000	\$100,000	\$75,000		ľ
25 ESA/E&HHRA	\$75,000	\$0	\$110,000		
26 CDA Failure Effects Analysis	\$55,000	\$50,000	\$85,000		
27 Env. Monitoring/Reclamation Mitigation	\$200,000	\$140,000	\$200,000		
Estimated Direct Reclamation Costs	\$5,015,395	\$1,513,026	\$5,872,610	\$8,006,884	-
28 Management during Reclamation Period	\$200,000	Mgmt, Travel, Mob, Camp	\$600,000	\$789,570	Project Management - 3%
Travel during Red Period (2 Yrs)	\$100,000	Combined	\$100,000	\$1,390,238	Mobilization/Demobilization
Mobilization/Camp Costs (2 Yrs)	\$300,000	\$400,000	\$300,000	1	I
Engineering Allowance	\$250,770	\$0	\$880,892	\$789,570	Engineering - 3%
Contingency Allowance	\$752,309	\$0	\$1,174,522	\$6,579,754	Contingency Allowance - 25%
Estimated Reclamation O/H Costs	\$1,603,079	\$400,000	\$3,055,414	\$9,549,132	
Total Estimated Reclamation Cost	\$6,618,474	\$1,913,026	\$8,928,024	\$17,556,016	
Post Closure Monitoring & Maintenance (10 yrs)	\$1,325,000	\$0	\$1,325,000	\$16,921,894	Post Closure Monitoring, Maintenance & Water Treatment (200 Years).
Total Estimated Reclamation Liability	\$7,943,474	\$1,913,026	\$10,253,024	\$34,477,910	COMMENT COMMENT

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Mackenzie Valley Land and Inter Board
Review of Reclamation Cos. _stimates for the Cantung Mine
Cantung Mine
September 11, 2003

As seen in Table 1 the four estimates vary between \$1.9 million and \$34.5 million (Gartner Lee had prepared liability estimates for three levels of reclamation. The highest estimate was \$49.3 million, which was based on full restoration of the site to pre-mining conditions and included activities such as picking up all tailings and returning them into the U/G mine. The \$10.3 million Gartner Lee estimate used in this assessment was predicated on reclamation of the site to provide long-term environmental protection.).

The AMEC estimate includes estimated direct reclamation costs of \$5.0 million plus indirect or overhead costs of \$1.6 million for a total reclamation cost of \$6.6 million. Post closure environmental monitoring and maintenance costs add an additional \$1.3 million for a total reclamation liability estimate of \$7.9 million.

This is based on the assumption that reclamation will be completed within a two-year time frame following the final cessation of mining and that environmental monitoring and maintenance will continue for a further 10-year period.

The wide disparity in the estimates presented in Table 1 arise from the following factors:

- The July 2003 A&R Plan for the CanTung Mine site is conceptual in nature and does not contain sufficient information to allow the potential areas of uncertainty to be adequately addressed. Specifically, there remains uncertainty in the area of understanding the long-term potential for acid rock generation and metal leaching from wall rock in the post closure open pit and underground workings, waste rock dumps and from the tailings facilities. Additional data is needed to fully eliminate the risks associated with this potential liability;
- There is insufficient information available to know what will happen to water quality draining from the mine and tailings impoundments over the long-term and, consequently, it is difficult to assess the need for post closure water treatment or to quantify the cost of post closure water treatment; and
- ➤ The amount of effort required for post closure environmental monitoring and maintenance is difficult to assess, predict and cost without understanding the long term acid generating and metal leaching potential and the resultant long-term water quality issues at this site.

The Cantung Mine first entered operation as an open pit mine in 1962. Mining activity moved underground in 1974 and continued through 1986. All mining operations were suspended between 1986 and 2002 due to depressed tungsten commodity prices. During this shut down period, the mine was maintained on a "care and maintenance" basis that included ongoing environmental monitoring Consequently, we have water quality data from the Cantung Mine for approximately 40 years that indicates that water quality draining from the open pit, U/G mine workings and tailings impoundments has not yet triggered any need for water treatment nor is there any indication of an impending adverse trend in water quality. While this observation

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Review of Reclamation Cd Cantung Mine September 11, 2003

stimates for the Cantung Mine



cannot rule out all of the risk that water treatment may be required at some point in the future, it does suggest that there is a good possibility that water treatment may not be required at this site.

The key assumptions drawn by AMEC in coming up with this blended estimate are as follows:

- > The tailings that are currently stored on the Flat River floodplain will not have to be relocated. Additional rock armouring will be provided along the shoreline to protect these deposits from erosion during possible flood conditions;
- The tailings in Pond 1 and 2 will not have to be relocated. The existing soil cover will be upgraded and reseeded. Additional armouring will be placed along the toe to protect from erosion by the Flat River;
- > The tailings in Pond 3 will not have to be relocated. A soil cover will be placed on top of the tailings once they are drained. An armoured spillway will be constructed to carry away surface runoff and the embankment will be buttressed where needed to provide slope stability;
- All site buildings will be demolished and the debris disposed of in a landfill on-site;
- No treatment of pit drainage or mine water will be required; and
- Post closure environmental monitoring and maintenance will continue for ten years after reclamation has been completed.

There are significant differences in some of the key unit rates used by North American Tungsten Corporation (NATL), Gartner Lee (GL) and Brodie Consulting (RECLAIM Model) in the preparation of their relative reclamation cost estimates. The key differences are captured in Table 2.

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Mackenzie Valley Land and ter Board
Review of Reclamation Cost Estimates for the Cantung Mine
Cantung Mine
September 11, 2003

Table 2: Comparison of Unit Rates Used by North American Tungsten, Gartner Lee and Brodie Consulting in estimating Reclamation Liability at the CanTung Mine Site

	1	MATI	CI	RECLAIM Model		
Activity	Unit	NATL	GL	Low	Hìgh	
Riprap existing channel	/m³	\$5	\$30	\$9.95	\$14.85	
Riprap runoff ditch	/m³	\$10	\$30	\$10.10	\$15.40	
Additional toe armour	/m³	\$5	\$15			
Buttress Embankment	/m³		\$15			
Excavate Soil	/m³	\$5	\$5	\$2.91	\$4.40	
Excavate and haul soil	/m³		\$15	\$3.61	\$5.43	
Placement of soil cover	/m³	\$5	\$15	\$4.05	\$8.14	
Light contouring	/ha	\$470				
Medium contouring	/ha	\$950				
Contouring	/ha		\$2,000			
Dozīng - rock pile	/m³			\$0.77	\$1.77	
Ripping pavement	/ha	\$345				
Haulage and disposal of pavement	/m³	\$5		ł		
Excavate and haul pavement	/m³		\$15			
Relocate Scrap	/m³		\$30			
Tear down industrial buildings	/m²		\$100	\$32.00	\$48.00	
Tear down housing	/m²		\$25	\$19.50	\$30.00	
Seeding	/ha	\$500	\$2,000	\$1,450		
Maintenance fertilizer	/ha	\$500	\$500			
Seal openings to UG Mine	each	\$10,000	\$10,000	ļ		
Block Pit Adits	each	\$3,000	\$5,000			
Shaft & Raise Closures	/m²			\$480	\$1,590	
Portals	/m³				\$185	
Landfill water samples	/sample	\$250	\$4			
Excavate and haul rock from dump	/m³		\$15	\$3.82	\$5.25	

The impact of using these different unit rates on the overall reclamation liability estimate is presented in Table 3.

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Mackenzie Valley Land an ater Board
Review of Reclamation Co... Estimates for the Cantung Mine

Cantung Mine September 11, 2003

Table 3: Estimate of Reclamation Liability at the CanTung Mine Site

Sing NATL			Estimated Rec	lamation Liab	ility for the Car	Tung Mine Site
Flat River Tailings		Component				
2 Tailings Pond No. 1 & 2 \$20,500 \$55,500 \$41,175 \$53,250 \$10 Lagoon \$9,880 \$19,240 \$18,970 \$19,240 \$18,970 \$19,240 \$18,000 \$251,000 \$107,000 \$107,000 \$100,000 \$100,000 \$22,900 \$30,000 \$20,000 \$250,000 \$250,000 \$10,000 \$100,000		•	- 1	_	_	i ,
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3 Old Lagoon \$9,880 \$19,240 \$18,970 \$19,240 4 Tailings Pond #3 \$226,650 \$333,950 \$521,950 \$611,200 5 Tailings Pond #4 \$85,640 \$249,420 \$18,970 \$177,420 6 Tailings Pond #5 \$85,640 \$158,000 \$86,900 \$107,000 7 Old Landfill \$5,500 \$13,500 \$8,900 \$10,000 8 Active Landfill \$15,500 \$43,500 \$22,280 \$30,000 10 Upper Scrap Yard \$64,750 \$36,600 \$29,900 \$35,000 11 Upper Scrap Yard \$64,750 \$68,500 \$27,000 \$20,000 12 Reagents/Chemicals/Betteries \$1,000 \$25,000 \$25,000 \$25,000 13 Used Oil \$5,000 \$25,000 \$25,000 \$25,000 14 Industrial Buildings \$310,250 \$1,650,000 \$245,000 \$25,000 15 Hydrocarbon Tanks and Pipelines \$100,000 \$100,000 \$100,000 \$100,000 16 Housing in Townsite (76 Buildings) \$125,000 \$2,665,000 \$1,466,000 \$1,466,000 17 Roadways and Powerlines \$68,535 \$68,535 \$68,535 \$68,535 \$86,535 \$86,535 \$86,535 \$86,535 \$1,2500 \$20,000 \$240,000 19 Metal Contaminated Soil \$47,500 \$122,500 \$55,000 \$25,000 20 Underground Mine \$51,000 \$35,000 \$55,000 \$25,000 21 Open Pit \$11,500 \$11,500 \$11,500 \$11,500 \$11,500 \$11,500 \$11,500 \$11,500 \$75,000 \$75	1	-	-			I
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13 Used Oil \$5,000 \$25,000 \$25,000 14 Industrial Buildings \$310,250 \$1,650,000 \$845,000 \$1,250,000 15 Hydrocarbon Tanks and Pipelines \$100,000 \$100,000 \$100,000 \$100,000 16 Housing in Townsite (75 Buildings) \$125,000 \$2,625,000 \$1,466,000 \$1465,000 17 Roadways and Powerlines \$68,535 \$68,535 \$68,535 \$68,535 18 Hydrocarbon Contaminated Soil \$125,000 \$370,000 \$200,000 \$240,000 19 Metal Contaminated Soil \$47,500 \$122,500 \$70,000 \$85,000 20 Underground Mine \$51,000 \$55,000 \$55,000 \$55,000 21 Open Pit \$11,500 \$11,500 \$11,500 \$11,500 22 Waste Rock and Ore Piles \$15,000 \$15,000 \$52,500 \$100,000 23 Land Reclamation and Revegetation \$59,000 \$75,000 \$75,000 \$75,000 25 ESA/E&IHRA <t< td=""><td></td><td>Reagents/Chemicals/Batteries</td><td>\$1,000</td><td>\$25,000</td><td>\$25,000</td><td>\$25,000</td></t<>		Reagents/Chemicals/Batteries	\$1,000	\$25,000	\$25,000	\$25,000
14 Industrial Buildings \$310,250 \$1,650,000 \$845,000 \$1,250,000 15 Hydrocarbon Tanks and Pipelines \$100,000 \$100,000 \$100,000 \$100,000 16 Housing in Townsite (75 Buildings) \$125,000 \$2,625,000 \$1,466,000 \$1,465,000 17 Roadways and Powerlines \$68,535 \$68,535 \$68,535 \$68,535 18 Hydrocarbon Contaminated Soil \$125,000 \$370,000 \$200,000 \$240,000 19 Metal Contaminated Soil \$125,000 \$370,000 \$200,000 \$240,000 20 Underground Mine \$51,000 \$55,000 \$55,000 \$55,000 21 Open Pit \$11,500 \$11,500 \$11,500 \$11,500 \$11,500 22 Waste Rock and Ore Piles \$15,000 \$15,000 \$99,000 \$100,000 23 Land Reclamation and Revegetation \$59,000 \$110,000 \$99,000 \$100,000 25 ESA/E&HHRA \$75,000 \$75,000 \$75,000 \$75,000 \$75,00	H	· · · · · · · · · · · · · · · · · · ·		\$25,000	\$25,000	\$25,000
15 Hydrocarbon Tanks and Pipelines \$100,000 \$100,000 \$100,000 \$100,000 16 Housing in Townsite (75 Buildings) \$125,000 \$2,625,000 \$1,466,000 \$1,465,000 17 Roadways and Powerlines \$68,535 \$68,535 \$68,535 \$68,535 18 Hydrocarbon Contaminated Soil \$125,000 \$370,000 \$200,000 \$240,000 19 Metal Contaminated Soil \$47,500 \$122,500 \$70,000 \$85,000 20 Underground Mine \$51,000 \$55,000 \$55,000 \$55,000 21 Open Pit \$11,500 \$11,500 \$11,500 \$11,500 \$11,500 \$11,500 \$11,500 \$11,500 \$11,500 \$11,500 \$11,500 \$11,500 \$10,000 \$5,250 \$15,000 \$10,000 \$20,000 \$100,000 \$100,000 \$100,000 \$100,000 \$100,000 \$75,000 \$75,000 \$75,000 \$75,000 \$75,000 \$75,000 \$75,000 \$75,000 \$75,000 \$75,000 \$75,000 \$75,000 \$75,00		Industrial Buildings	\$310,250	\$1,650,000	\$845,000	\$1,250,000
17 Roadways and Powerlines \$68,535 \$68,535 \$68,535 \$68,535 18 Hydrocarbon Contaminated Soil \$125,000 \$370,000 \$200,000 \$240,000 19 Metal Contaminated Soil \$47,500 \$122,500 \$70,000 \$85,000 20 Underground Mine \$51,000 \$55,000 \$55,000 \$55,000 21 Open Pit \$11,500 \$11,500 \$11,500 \$11,500 22 Waste Rock and Ore Piles \$15,000 \$15,000 \$5,250 \$15,000 23 Land Reclamation and Revegetation \$59,000 \$110,000 \$99,000 \$100,000 24 EEM Program \$75,000 \$75,000 \$75,000 \$75,000 25 ESA/E&HHRA \$75,000 \$75,000 \$75,000 \$75,000 26 CDA Failure Effects Analysis \$55,000 \$85,000 \$55,000 \$55,000 27 Env. Monitoring/Reclamation Mitigation \$200,000 \$200,000 \$200,000 \$200,000 28 Management during Recla	15	-	\$100,000	\$100,000	\$100,000	\$100,000
18 Hydrocarbon Contaminated Soil \$125,000 \$370,000 \$240,000 19 Metal Contaminated Soil \$47,500 \$122,500 \$70,000 \$85,000 20 Underground Mine \$51,000 \$55,000 \$55,000 \$55,000 21 Open Pit \$11,500 \$11,500 \$11,500 \$11,500 22 Waste Rock and Ore Pites \$15,000 \$55,250 \$15,000 23 Land Reclamation and Revegetation \$59,000 \$110,000 \$99,000 \$100,000 24 EEM Program \$75,000 \$75,000 \$75,000 \$75,000 \$75,000 25 ESA/E&HHRA \$75,000 \$75,000 \$75,000 \$75,000 \$75,000 26 CDA Failure Effects Analysis \$55,000 \$85,000 \$55,000 \$55,000 27 Env. Monitoring/Reclamation Mitigation \$200,000 \$200,000 \$200,000 Estimated Direct Reclamation Costs \$1,912,645 \$7,170,145 \$4,365,055 \$5,015,395 28 Management during Reclamation Period	16	Housing in Townsite (75 Buildings)	\$125,000	\$2,625,000	\$1,466,000	\$1,465,000
19 Metal Contaminated Soil \$47,500 \$122,500 \$70,000 \$85,000 20 Underground Mine \$51,000 \$55,000 \$55,000 \$55,000 21 Open Pit \$11,500 \$11,500 \$11,500 \$11,500 22 Waste Rock and Ore Pites \$15,000 \$15,000 \$5,250 \$15,000 23 Land Reclamation and Revegetation \$59,000 \$110,000 \$99,000 \$100,000 24 EEM Program \$75,000 \$75,000 \$75,000 \$75,000 \$75,000 25 ESA/E&HHRA \$75,000 \$75,000 \$75,000 \$75,000 \$75,000 26 CDA Failure Effects Analysis \$55,000 \$85,000 \$55,000 \$55,000 27 Env. Monitoring/Reclamation Mitigation \$200,000 \$200,000 \$200,000 \$200,000 28 Management during Reclamation Period \$150,000 \$600,000 \$130,952 \$200,000 Travel during Recl Period (2 Yrs) \$50,000 \$100,000 \$100,000 \$100,000 \$100,000 <td>17</td> <td>Roadways and Powerlines</td> <td>\$68,535</td> <td>\$68,535</td> <td>\$68,535</td> <td>\$68,535</td>	17	Roadways and Powerlines	\$68,535	\$6 8,535	\$68,535	\$68,535
20 Underground Mine \$51,000 \$55,000 \$55,000 21 Open Pit \$11,500 \$11,500 \$11,500 22 Waste Rock and Ore Pites \$15,000 \$15,000 \$5,250 \$15,000 23 Land Reclamation and Revegetation \$59,000 \$110,000 \$99,000 \$100,000 24 EEM Program \$75,000 \$70,000 \$70,000 \$70,000 \$70,000 \$70,000 \$70,000 \$70,000	18	Hydrocarbon Contaminated Soll	\$125,000	\$370,000	\$200,000	\$240,000
21 Open Pit \$11,500 \$11,500 \$11,500 \$11,500 22 Waste Rock and Ore Piles \$15,000 \$15,000 \$5,250 \$15,000 23 Land Reclamation and Revegetation \$59,000 \$110,000 \$99,000 \$100,000 24 EEM Program \$75,000 \$75,000 \$75,000 \$75,000 \$75,000 \$75,000 25 ESA/E&HHRA \$75,000 \$75,000 \$75,000 \$75,000 \$75,000 \$75,000 26 CDA Failure Effects Analysis \$55,000 \$85,000 \$55,000 \$55,000 \$55,000 \$55,000 \$55,000 \$55,000 \$55,000 \$55,000 \$55,000 \$50,000 \$200,000 \$200,000 \$200,000 \$200,000 \$200,000 \$200,000 \$200,000 \$200,000 \$200,000 \$200,000 \$100,000 \$100,000 \$100,000 \$100,000 \$100,000 \$100,000 \$100,000 \$100,000 \$100,000 \$100,000 \$200,000 \$200,000 \$200,000 \$200,000 \$200,000 \$200,000 \$200,000 \$200,000 \$200,000 \$200,000 \$200,00	19	Metal Contaminated Soil	\$47,500	\$122,500	\$70,000	\$85,000
22 Waste Rock and Ore Pites \$15,000 \$5,250 \$15,000 23 Land Reclamation and Revegetation \$59,000 \$110,000 \$99,000 \$100,000 24 EEM Program \$75,000 \$71,0145 \$71,0145 \$71,0145 </td <td>20</td> <td>Underground Mine</td> <td>\$51,000</td> <td>\$55,000</td> <td>\$55,000</td> <td>\$55,000</td>	20	Underground Mine	\$51,000	\$55,000	\$55,000	\$55,000
23 Land Reclamation and Revegetation \$59,000 \$110,000 \$99,000 \$100,000 24 EEM Program \$75,000 \$700,000 \$700,000 \$700,000 \$700,000 \$700,000 \$700,000 \$700,000 \$700,000 \$700,000 \$700,000 \$700,000 \$700,000 \$700,000 \$700,000 \$700,000 \$700,000 \$700,000 \$700,000 \$700,000	21	Open Pit	\$11,500	\$11,500	\$11,500	\$11,500
24 EEM Program \$75,000 \$200,000 \$200,000 \$200,000 \$200,000 \$100,000 <t< td=""><td>22</td><td>Waste Rock and Ore Piles</td><td>\$15,000</td><td>\$15,000</td><td>\$5,250</td><td>\$15,000</td></t<>	22	Waste Rock and Ore Piles	\$15,000	\$15,000	\$5,250	\$15,000
25 ESA/E&HHRA \$75,000 \$75,000 \$75,000 \$75,000 \$500,000 \$500,000 \$	23	Land Reclamation and Revegetation	\$59,000	\$110,000	\$99,000	\$100,000
26 CDA Failure Effects Analysis \$55,000 \$85,000 \$55,000 27 Env. Monitoring/Reclamation Mitigation \$200,000 \$200,000 \$200,000 Estimated Direct Reclamation Costs \$1,912,645 \$7,170,145 \$4,365,055 \$5,015,395 28 Management during Reclamation Period \$150,000 \$600,000 \$130,952 \$200,000 Travel during Recl Period (2 Yrs) \$50,000 \$100,000 \$100,000 \$100,000 Mobilization/Camp Costs (2 Yrs) \$200,000 \$300,000 \$300,000 \$300,000 Engineering Allowance (5%) \$95,632 \$358,507 \$218,253 \$250,770 Contingency Allowance (15%) \$286,897 \$1,075,522 \$654,758 \$752,309 Estimated Reclamation O/H Costs \$782,529 \$2,434,029 \$1,403,963 \$1,603,079 Total Estimated Reclamation & Maintenance (10 yrs) \$1,325,000 \$1,325,000 \$1,325,000 \$1,325,000 \$1,325,000	24	EEM Program	\$75,000	\$75,000	\$75,000	\$75,000
27 Env. Monitoring/Reclamation Mitigation \$200,000 \$200,000 \$200,000 \$200,000 Estimated Direct Reclamation Costs \$1,912,645 \$7,170,145 \$4,365,055 \$5,015,395 28 Management during Reclamation Period \$150,000 \$600,000 \$130,952 \$200,000 Travel during Recl Period (2 Yrs) \$50,000 \$100,000 \$100,000 \$100,000 Mobilization/Camp Costs (2 Yrs) \$200,000 \$300,000 \$300,000 \$300,000 Engineering Allowance (5%) \$95,632 \$358,507 \$218,253 \$250,770 Contingency Allowance (15%) \$286,897 \$1,075,522 \$654,758 \$752,309 Estimated Reclamation O/H Costs \$782,529 \$2,434,029 \$1,403,963 \$1,603,079 Total Estimated Reclamation Cost \$2,695,174 \$9,604,174 \$5,769,018 \$6,618,474 Post Closure Monitoring & Maintenance (10 yrs) \$1,325,000 \$1,325,000 \$1,325,000 \$1,325,000 \$1,325,000	25	ESA/E&HHRA	\$75,000	\$75,000	\$75,000	\$75,000
Estimated Direct Reclamation Costs \$1,912,645 \$7,170,145 \$4,365,055 \$5,015,395 28 Management during Reclamation Period \$150,000 \$600,000 \$130,952 \$200,000 Travel during Recl Period (2 Yrs) \$50,000 \$100,000 \$100,000 \$100,000 Mobilization/Camp Costs (2 Yrs) \$200,000 \$300,000 \$300,000 Engineering Allowance (5%) \$95,632 \$358,507 \$218,253 \$250,770 Contingency Allowance (15%) \$286,897 \$1,075,522 \$654,758 \$752,309 Estimated Reclamation O/H Costs \$782,529 \$2,434,029 \$1,403,963 \$1,603,079 Total Estimated Reclamation Cost \$2,695,174 \$9,604,174 \$5,769,018 \$6,618,474 Post Closure Monitoring & Maintenance (10 yrs) \$1,325,000 \$1,325,000 \$1,325,000	26	CDA Failure Effects Analysis	\$55,000	\$85,000	\$55,000	\$55,000
28 Management during Reclamation Period \$150,000 \$600,000 \$130,952 \$200,000 Travel during Recl Period (2 Yrs) \$50,000 \$100,000 \$100,000 \$100,000 Mobilization/Camp Costs (2 Yrs) \$200,000 \$300,000 \$300,000 \$300,000 Engineering Allowance (5%) \$95,632 \$358,507 \$218,253 \$250,770 Contingency Allowance (15%) \$286,897 \$1,075,522 \$654,758 \$752,309 Estimated Reclamation O/H Costs \$782,529 \$2,434,029 \$1,403,963 \$1,603,079 Total Estimated Reclamation Cost \$2,695,174 \$9,604,174 \$5,769,018 \$6,618,474 Post Closure Monitoring & Maintenance (10 yrs) \$1,325,000 \$1,325,000 \$1,325,000 \$1,325,000	27	Env. Monitoring/Reclamation Mitigation	\$200,000	\$200,000	\$200,000	\$200,000
Travel during Recl Period (2 Yrs) \$50,000 \$100,000 \$100,000 Mobilization/Camp Costs (2 Yrs) \$200,000 \$300,000 \$300,000 \$300,000 Engineering Allowance (5%) \$95,632 \$358,507 \$218,253 \$250,770 Contingency Allowance (15%) \$286,897 \$1,075,522 \$654,758 \$752,309 Estimated Reclamation O/H Costs \$782,529 \$2,434,029 \$1,403,963 \$1,603,079 Total Estimated Reclamation Cost \$2,695,174 \$9,604,174 \$5,769,018 \$6,618,474 Post Closure Monitoring & Maintenance (10 yrs) \$1,325,000 \$1,325,000 \$1,325,000 \$1,325,000	Est	Imated Direct Reclamation Costs	\$1,912,645	\$7,170,145	\$4,365,055	\$5,015,395
Mobilization/Camp Costs (2 Yrs) \$200,000 \$300,000 \$300,000 Engineering Allowance (5%) \$95,632 \$358,507 \$218,253 \$250,770 Contingency Allowance (15%) \$286,897 \$1,075,522 \$654,758 \$752,309 Estimated Reclamation O/H Costs \$782,529 \$2,434,029 \$1,403,963 \$1,603,079 Total Estimated Reclamation Cost \$2,695,174 \$9,604,174 \$5,769,018 \$6,618,474 Post Closure Monitoring & Maintenance (10 yrs) \$1,325,000 \$1,325,000 \$1,325,000 \$1,325,000	28	Management during Reclamation Period	\$150,000	\$600,000	\$130,952	\$200,000
Engineering Allowance (5%) \$95,632 \$358,507 \$218,253 \$250,770 Contingency Allowance (15%) \$286,897 \$1,075,522 \$654,768 \$752,309 Estimated Reclamation O/H Costs \$782,529 \$2,434,029 \$1,403,963 \$1,603,079 Total Estimated Reclamation Cost \$2,695,174 \$9,604,174 \$5,769,018 \$6,618,474 Post Closure Monitoring & Maintenance (10 yrs) \$1,325,000 \$1,325,000 \$1,325,000 \$1,325,000		Travel during Recl Period (2 Yrs)	\$50,000	\$100,000	,	1
Contingency Allowance (15%) \$286,897 \$1,075,522 \$654,758 \$752,309 Estimated Reclamation O/H Costs \$782,529 \$2,434,029 \$1,403,963 \$1,603,079 Total Estimated Reclamation Cost \$2,695,174 \$9,604,174 \$5,769,018 \$6,618,474 Post Closure Monitoring & Maintenance (10 yrs) \$1,325,000 \$1,325,000 \$1,325,000 \$1,325,000		Mobilization/Camp Costs (2 Yrs)	\$200,000	\$300,000	\$300,000	\$300,000
Estimated Reclamation O/H Costs \$782,529 \$2,434,029 \$1,403,963 \$1,603,079 Total Estimated Reclamation Cost \$2,695,174 \$9,604,174 \$5,769,018 \$6,618,474 Post Closure Monitoring & Maintenance (10 yrs) \$1,325,000 \$1,325,000 \$1,325,000		Engineering Allowance (5%)	\$95,632	\$358,507	1	\$250,770
Total Estimated Reclamation Cost \$2,695,174 \$9,804,174 \$5,769,018 \$6,618,474 Post Closure Monitoring & Maintenance (10 yrs) \$1,325,000 \$1,325,000 \$1,325,000 \$1,325,000		Contingency Allowance (15%)	\$286,897	\$1,075,522	\$654,758	\$752,309
Post Closure Monitoring & Maintenance (10 yrs) \$1,325,000 \$1,325,000 \$1,325,000	Est	imated Reclamation O/H Costs	\$782,529	\$2,434,029	\$1,403,963	\$1,603,079
THE STATE OF THE S	Tot	al Estimated Reclamation Cost	\$2,695,174	\$9,604,174	\$5,769,018	\$6,618,474
T-1 F-1 - 1 D - 1 - 200 1 1 1 1 1 1 2 2 2 2 2 2 2 2 2 2 2 2	Pos	st Closure Monitoring & Maintenance (10 yrs)	\$1,325,000	\$1,325,000	\$1,325,000	\$1,325,000
Total Estimated Reciamation Liability \$4,020,174 \$10,929,174 \$7,094,010 \$7,943,474	Tot	al Estimated Reclamation Liability	\$4,020,174	\$10,929,174	\$7,094,018	\$7,943,474

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For the four estimates presented in Table 3, similar reclamation components, reclamation activities, quantities, engineering allowance rates and contingency allowance rates were assumed with the only difference being the unit cost rates applied. For example, for Component 1 (Flat River Tailings), the reclamation activity is placement of 2,000 cubic metres of additional armour rock along the riverbank bern separating these tailings from the Flat River. NATCL applied a unit rate of \$5/m³, GL applied a unit rate of \$30/m³ and the Reclaim Model suggests a unit rate of \$15/m³. The blended estimate applied a unit rate of \$20/m³.

The resulting estimates of total reclamation liability varied from a low of \$4.0 million (applying the NATCL unit rates) to a high of \$10.9 million (applying GL unit rates). AMEC used its own costing experience to apply appropriate unit rates in coming up with the "blended estimate".

In summary, AMEC has reviewed the various cost estimates of reclamation liability for the Cantung Mine and feels that the "Blended Estimate" of \$7.9 million (\$6.6 million in direct and indirect reclamation cost, plus \$1.3 million for Post Closure monitoring and maintenance) represents a reasonable estimate of reclamation liability at this site, based on current information. This estimate does contain risk. Based on the current information available, it cannot be ruled out that at some point in the future, metal leaching or acid rock drainage may become a problem resulting in additional liability for remediation or treatment. There is, however, no evidence that such an event will occur. Additional site-specific metal leaching/ARD studies are required to reduce or eliminate such risk.

This letter has been prepared for the exclusive use of the MVLWB for specific application to the subject described herein. Any use which a third party makes of this report, or any reliance on or decisions made based on it, are the responsibility of such third parties. AMEC accepts no responsibility for damages, if any, suffered by any third party as a result of decisions made or actions based on this report. It has been prepared in accordance with generally accepted engineering practices. No other warranty, expressed or implied, is made.

Respectfully Submitted,

AMEC Earth & Environmental Limited

Larry Connell, P.Eng.

Senior Mining Environmental Consultant

Reviewed by:

Peter & Lighthall, P.Eng. Vice President, Mining

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Appendix A

Reclamation Cost Estimate for the CanTung Mine

Objectives: Long Term Environmental Protection, Safety and Security

Prepared by: AMEC Earth & Environmental (Based on a Blend of Unit Rates and Quantities from Other Estimates), September 2003

Component	Task	Unit Cost	Quantity	Years	individual Costs	Componer Costs \$
Flat River Tailings	Additional armouring to protect	\$20/m³	2,000	1	\$40,000	
i let t titor / p linige	talls from erosion sub-tol					540.00
	840-104	<u>ai</u>		· · · · · · · · · · · · · · · · · · ·		7.3.1
Tallings Pond No. 1 & 2	Upgrade soil cover	\$10/m³	1,250	1	\$ 12,500	
Taurigs Ford No. 1 & 2	Seedina Seedina	\$1.500 /ha	4	1	\$6,000	ļ
	Maintenance fertilizer	\$500 /ha	4	2	\$4,000	i
	Buttress Embankment	\$20/m³	1,200	1	\$24,000]
	Riprap ditch	\$30/m ³	225	1	\$6,750	
	sub-tol	şi				\$53,2
						_
Old Lagoon	Upgrade existing overflow	\$5,000 LS	1	1	\$5,000	
-	Buttress embankment	\$15/m ⁹	800	1	\$13,500	!
	Excavate swale (50il)	\$5/m ³	40	1	\$200	
	Riprap swale	\$30 /m ⁸	18	1	\$540	
	sub-tol	<u>al</u>				\$19,2
		m.m. 3	40.000		# #50,000	
Tailings Pond #3	Buttress embankment	\$15/m³	10,000	1	\$150,000	•
	Soil cover	\$10 /m ³	43,750	1	\$437,500 \$12,000	ļ
	Seeding	\$1,500 /hz	8 8	2	\$12,000 \$8,000	
	Maintenance fertilizer	\$500/ha \$5 <i>/</i> m³	200	1	\$6,000 \$1,000	
	Excavate spiliway (soif)	\$5/m² \$30/m³	200 90	1	\$2,700	
	Riprap spiilway sub-to	••	90	•	\$2,700	\$511,2
	5u p*(0	141				
Tallings Pond #4	Soil cover	\$10/m ³	15,000	1	\$150,000	
(polishing pond)	Buttress Embankment	\$20/m³	900	1	\$18,000	
(ponstaring porta)	Excavate swale	\$5 /m ³	300	1	\$1,500	1
	Riprap swale	\$30 /m ⁵	14	1	\$420	1
	Seeding :	\$1,500 /ha	3	1	\$4,500	i
	Maintenance fertilizer	\$500 /ha	3	2	\$3,000	
	sub-to	•				\$1 77 ,4
Tailings Pond #5	Light contour	\$1,000/ha	2	1	\$2,000	
-	Soll cover	\$10 <i>/</i> m³	10,000	1	\$100,000	
	Seeding	\$1,500 /ha	2	1	\$3,000	
	Maintenance fertilizer	\$500 /ha	2	2	\$2,000	
	Excavate spillway (soil)	\$5/m³	300	1	\$1,500	
	Riprap spillway	\$30 /m³	100	1	\$3,000	
	sub-lo	tal				\$107,0
		540 t=3		4	¢e nan	
Old Landfill	Upgrade soll cover	\$10/m³	500	1	\$5,000 \$3,000	
	Seeding	\$1,500/ha	2 2	2	\$3,000 \$2,000	
	Maintenance fertilizer sub-to	\$500/ha	2	4	32,000	\$10,0
	OJ-BUB-	'SEAI				10.00
Active Landfill	Soil cover	\$10/m³	2,500	1	\$25,000	
ACHAG ESTIGNI	Séeding	\$1.500/ha	2	1	\$3,000	
	Maintenance fertilizer	\$500 /ha	2	2	\$2,000	ļ
	sub-to		-	_	>-,	\$30.0

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Mackenzie Valley Land and ter Board
Review of Reclamation Cos. __stimates for the Cantung Mine
Cantung Mine

September 11, 2003

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Compositi		Unit Cost	Quantity		individual Costs \$	Component Costs !\$
9 New (Demolition) Landfill	Design	\$5,000 LS_	1	1	\$5,000	
•	Soll cover	\$10/m³	2,500	1	\$25,000	i
	Seeding	\$1,500 /ha	2	1	\$3,000 #3,000	
	Maintenance fertilizer sub-total	\$500 /ha	2	2	\$ 2,000	\$35,000
10 Upper Scrap Yard	Drain	\$1,000 LS	1	1	\$1,000	
To Opper Scrap Tato	Relocate scrap	\$30/m³	2.000	1	\$60,000	
	Seeding	\$1,500 /ha	2.5	1	\$ 3,750	
	Maintenance fertilizer	\$500 /ha	2.5	2	\$2,500	
	sub-lotal	440				\$67,25
11 PCB's	Offsite disposal	\$20,000 LS	1	1	\$20,000	<u>į</u>
	sub-total					\$20,000
2 Reagents/Chemicals/	Offsite disposal	\$25,000 LS	1	1	\$25,000	
Batterles	sub-total	-				\$25,000
13 Used Oil	Offsite disposal	\$25,000 LS	1	1	\$25,000	
10 0000 OII	sub-total					\$25,000
14 Industrial Buildings	Removal & disposal of hazardous	\$25,000 LS	1	1	\$25,000	
.,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	materials Removal & disposal of equipment	\$100,000 LS	1	1	\$100,000	E
	& building contents Demolish buildings and dispose	\$75/m²	15,000	1	\$1,125,000	
	of debris on-site Soil cover over concrete building	\$10/m ³	6,000	1	\$60,000	
	slabs sub-total	2.10/m	6,000	,	300,000	\$1,250,000
	5 <u>40-(4(4)</u>					
15 Hydrocarbon Tanks and Pipelines	Clean and landfill (surface)	\$100,000 LS	1	1	\$100,000	!
ripelines	sub-total					\$100,00
16 Housing in Townsite	Demolish wood structures and	\$35/m²	13,000	1	\$455,000	
75 Buildings)	dispose of debris Demolish metal frame buildings	\$45/m²	22,000	1	\$990,000	
	and dispose of debris	•	•	•	•	
	Disposal of hazardous materials sub-total	\$20,000 LS	1	1	\$20,000	\$1,465,00
17 Roadways and Powerlines	Excavate and landfill pavement from townsite roads	\$23,535 LS	1	1	\$23,535	
	Removal of powerlines and poles	\$20,000 LS	1	1	\$20,000	
	Scarification of mine site roadways	\$10,000 LS	1	1	\$10,000	
	Restoration of drainage (removal of cluverts & bridges)	\$15,000 LS	1	1	\$15,000	
	sub-total					\$68,53
18 Hydrocarbon Contaminate	ed Construct biocells	\$10,000 LS	1	1	\$10,000	
Soil		*			\$200,000	
	Excavate soil and place in biocell	\$10/m ³ \$5.000 Amar	20,000	1 5	\$200,000 \$25,000	
	Operate biodells Close biodells	\$5,000 /year \$5,000 LS	1	1	\$5,000	
	Close process sub-total	\$\$,UUU LO	•	•	901000	\$240,00

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INTROCKETIZE VAILEY LATE AND ALER BOARD
REVIEW of Reclaration Co. stimates for the Cantung Mine Cantung Mine September 11, 2003



Component	BOOK TO THE REAL PROPERTY OF THE PARTY OF TH	dunit Cost	Quantity	Years	individual Costs	Component Costs
19 Metal Contaminated Soll	Geochemical assessment	\$10,000 LS	1	1	\$10,000	
	Excavate soil & haul soil to Tailings	\$10/m³	7,500	1	\$75,000	
	sub-total					\$85,00
20 Underground Mine	U.G Berms	5 5,000 LS	. 1	1	\$5,000	
to buggistonia wile	Seal openings to mine	\$10.000 each	4	1	\$40,000	Į
	Block pit adils	\$5,000 each	2	1	\$10,000	
	sub-total					\$55,0
34 Open Dit	Upgrade Ditching	\$10,000 LS	1	1	\$10,000	
21 Open Pit	Block Access	\$1,500 LS	1	1	\$1,500	ļ
	sub-total			•		\$11.50
22 Waste Rock and Ore Piles	Relocate rock	\$15/m ³	1,900	1	\$15,000	
22 Waste Rock and Ore Files	sub-total	ψισπι	1,000	•		\$15,00
						!
23 Land Reclamation and Revegetation	Design	\$10,000 LS	1	1	\$10,000	j
1/6468grangi	Contouring	\$2,000 /ha	20	1	\$40,000	
	Seeding	\$1,500 /ha	20	1	\$30,000	
	Maintenance Fertilizer	\$500 /ha	20	2	\$20,000	
	sub-total					\$100,00
24 EEM Program	Data review/design	\$5,000 LS	1	1	\$5,000	
	Field Studies	\$40,000 LS	1	1	\$40,000	
	Analytical	\$20,000 L\$	1	1	\$20,000	
	Interpretation report	\$10,000 LS	1	1	\$10,000	\$75,00
	sub-total					
25 ESA/E&HHRA	E\$A field studies	\$30,000 LS	1	1	\$30,000	
	ESA analytical	\$15,000 LS	1	1	\$15,000	ı
	ESA interpretation report	\$10,000 LS	1	1	\$10,000	
	E&HHRA sub-totai	\$20,000 LS _.	1	1	\$20,000	\$75,00
	SUPIORI					
26 CDA Failure Effects Analysis	KIAGRUDIA	\$30,000 LS	1	1	\$30,000	
	Tailings Pond 1 & 2 - CDA Failure Effects	\$5,000 LS	1	1	\$5,000	
	Tailings Pond # 3 - CDA Failure Effects	\$5,000 LS	1	1	\$5,000	
	Tailings Pond 1,2 & 3 - Stability Analysis	\$15,000 LS	1	1	\$15,000	
	sub-total				<u>.</u>	.\$55,00
27 Environmental						
Monitoring/Reclamation Mitigation	Technician	\$50,000/уг	1	2	\$100,000	
	Analytical _i	\$20,000 /yr	1	2	\$40,000	
	Mitigation	\$30,000/yr	1	2	\$60,000	\$200,00
	sub-total					32UU.UL

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Mackenzie Valley Land and atter Board
Review of Reclamation Cost Estimates for the Cantung Mine
Cantung Mine
September 11, 2003

Management, Engineering, Contingency	Management	\$100,000 /yr	. 1	2	\$200,000		
Containgency	Travél	\$50,000 LS	1	2	\$100,000		
	Mobilization/camp	\$150,000 LS	1	2	\$300,000	i	i
	Engineering Allowance	5% L\$	5,015,395	1	\$250,770	-	
	Contingency Allowance	15% LS	5,015,395	1	\$752,30 9	1	
	sub-tot	al					503,07
otal Reclamation Activities	3					\$6,6	518,47
						- !	İ
n-Going EEM and Site	Water analytical (year 1-5)	\$250 /sample	80	5	\$100,000	1	
(California reca	Water analytical (year 5-10)	\$250 /sample	40	5	\$50,000	!	•
	Geotech Inspection (year 1-5)	\$20,000 /year	1	5	\$100,000	į	
	Geotech Inspection (year 5-10)	\$10,000/year	1	5	\$50,000		
	Maintenance (year 1-5)	\$2,000 /day	15	5	\$15 0,000		
	Maintenance (year 5-10)	\$2,000 /day	7.5	5	\$75,000	i	
	Travel (year 1-5)	\$10,000 /trip	4	5	\$200,000	i	
	Travel (year 5-10)	\$10,000/trip	2	5	\$100,000	i	
	Management	\$25,000 /year	1	10	\$250,000		
	Reporting	\$25,000 /year	1	10	\$250,000		<i>.</i>
	sub-tol					\$7.5	325,00
Subtotal On-going EEM and per year for Years 1 thru 5	d Site Maintenance	\$150,000 /year		•		Ì	
Subtotal On-going EEM and	d Site Maintenance					i	
per year for Years 6 thru 10	}	\$105,000/year					

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