## **Reclamation and Closure Plan**

## For the

## **Niblack Underground Exploration Project**

# **Prepared for:** Niblack Mining Corporation

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#### 1.0 INTRODUCTION

The Niblack property is in the exploration phase of development. The proposed underground exploration project (Project) is located approximately 30 miles southwest of Ketchikan in Southeast Alaska (Figure 1). The project is limited to development within private land holdings, with the exception of the tideland lease area managed by the Alaska Department of Natural Resources (ADNR). A list of all properties, including legal description, of where all work will occur is detailed in Section 5. Niblack Mining Corporation (NMC) is the owner and sole operator of the exploration property.

This reclamation and closure plan has been prepared in response to recommendations from the Large Mine Permit Team, and as required by AS 27.05.010(b), AS 27.19.010, and 11 AAC 97.100. All the land disturbance is on patented (Fee) land. The plan addresses conceptual reclamation principles and facility-specific reclamation plans that have been developed as a key component of the existing Plan of Operations (POO) for closure of the property. This plan includes a cost estimate to be used for bonding purposes.

The major components associated with the Project are an underground drift or tunnel to be used for drilling access, two waste rock repositories, an access road, sediment ponds and water treatment facility, and a marine dock facility (Figure 2). Ancillary facilities include: topsoil stockpiles, diversion systems, fuel storage, and supplies laydown and staging areas.

The main focus of the project is the construction of an underground access tunnel that will be used to develop drilling stations, in order to delineate potential mineral resources. The underground tunnel would be accessed through a newly defined portal as shown on Figure 3. Development rock would be hauled to the two waste rock stockpile areas (potentially acid-generating or PAG temporary storage site, and non acid-generating or NAG disposal site), and stormwater and contact water would be collected and treated prior to release to the environment. Any PAG material will be back-hauled to the ultimately flooded underground workings at closure.

The exploration project, once initiated would occur in phases based on continued success. The initial work program would last up to 24 months. Based on the results, further programs may be applied for, which would require updating, and seeking approval for modifications to this and other plans. Site reclamation and closure tasks are expected to generally be completed within two years after cessation of all exploration activities. Details regarding the exploration project are provided in the Plan of Operations (NMC, 2007).

The principal purpose of this plan is to identify, describe, and cost the required reclamation tasks that would have to be completed either concurrently with, or at the cessation of the exploration activities. Cost estimates for implementing these reclamation tasks are provided for the purpose of establishing a bond amount estimate, and determining the best bonding mechanism for the project to ensure that adequate funds are available for reclamation, post-closure monitoring, and maintenance purposes.

Alaska Statute AS 27.19.030(b) and Alaska Administrative Code 11 AAC 97.310(b)(6) & (7) allow the owner of private land to have an alternate post-mining (post-project) land use. The post-project land use for privately held patented mineral claims at Niblack is mineral development or other commercial use. Access roads and other surface structures (e.g. land camp area) will be retained post-closure and bonding will not be required for their removal.

#### 2.0 GUIDELINES FOR RECLAMATION AND CLOSURE

This section summarizes the various reclamation policies, goals, requirements, principles, processes, and criteria for closing the Niblack Exploration Project.

## 2.1 Niblack Corporate Environmental Policy and Reclamation Goals

NMC has adopted a Corporate Environmental Policy, which states, in summary, that the company is committed to protecting the environment, while at the same time operating the project in a responsible manner to maximize the benefits of a modern extractive industry. Moreover, the policy specifically states that the company will commit the necessary resources to protect potentially affected surface and ground water resources during exploration and mining activities and at closure. This is the primary policy upon which this reclamation and closure plan is derived.

NMC's long-term goals of reclamation during and after underground exploration activities are to return the land to a safe and stable condition, consistent with the establishment of productive post-project closure land uses. The designated post-project closure uses for the project area are defined as mineral development or other commercial use. Wildlife habitat and recreation will also be a consideration for post-project closure use.

Niblack will adhere to the above philosophy in developing and implementing the following reclamation goals at the project site:

- 1. Stabilization and protection of soil materials from wind and water erosion;
- 2. Stabilization of steep slopes through recontouring and leveling to provide rounded landforms and suitable growth media surfaces for natural invasion and recolonization by native plants;
- 3. Establishment of long-term, self-sustaining vegetation communities by reseeding with native plants and promoting natural recolonization and succession;
- 4. Protection of surface and ground water quality, and compliance with all water quality standards during operation and at closure;
- 5. Protection of public health by reducing potential hazards typically associated with construction sites;
- 6. Protection of fisheries, wildlife habitat, and recreational resources; and
- 7. Minimization of long-term closure requirements, especially for ongoing care and maintenance.

NMC has incorporated sound engineering principles in this reclamation plan to achieve these goals and post-closure uses.

## 2.2 Summary of Site Specific Reclamation Goals

The first step in the reclamation process will involve the removal and storage of topsoil and other growth media from all areas to be disturbed. Stockpiled topsoil and growth media would be seeded or covered with salvaged vegetation to reduce the potential for erosion during storage and maintain viability.

Relocation of PAG material back underground and reclamation of the PAG site will commence upon project closure, which is expected to be within 2 years of cessation of all exploration activities. Portal closure, including installation of cement plug, will commence after all PAG material has been relocated to the back of the adit. Other reclamation will include re-countering and topsoil placement at the NAG site, water treatment facility and sediment ponds. Later stages of final reclamation may include the removal of stormwater diversions and sedimentation ponds where they are no longer needed. All reclaimed areas will be seeded to aid erosion control and reestablish natural vegetation. A monitoring program will be implemented to track reclamation success.

Roads will remain in place as required for post-closure monitoring activities and for designated post-closure land use (mineral development and other commercial uses). Post-closure operation and maintenance of the road, including culverts and bridge crossing, will be in accordance with the terms and conditions of the ADNR Office of Habitat Management and Permitting (OHM&P) Fish Habitat Permit and US Army Corps of Engineers Permit.

Reclamation of barge landing and mooring facilities will occur upon termination of the Tideland Lease, and is bonded (performance guarantee) separately from the rest of the project site. Operation, maintenance, and ultimate reclamation of the barge landing and mooring facility, will be in accordance with the terms and conditions of the ADNR Division of Mining, Land and Water Tideland Lease, and US Army Corps of Engineers Permits.

## 2.3 Reclamation and Closure Principles

In addition to the general goals discussed above, the following reclamation and closure principles will apply for the life of the project and during closure:

- 1. The reclamation plan will describe reclamation requirements as they relate to interim reclamation, temporary closure, and final reclamation at closure.
- 2. All surface mining disturbances associated with the Niblack Construction and Exploration Project will be bonded for an amount equal to the actual cost estimate of reclaiming the disturbed areas.
- 3. Bond release criteria will be developed for all reclamation activities.

- 4. Soil or soil-like growth media (organic material and/or suitable subsoil) will be inventoried for volume and general reclamation suitability and stored for future reclamation use. Protection from erosion will be provided.
- 5. Disturbed areas no longer involved in exploration activities will receive reclamation treatment within two years, as described in the reclamation plan.
- 6. Best management practices (BMPs) for interim drainage stabilization and erosion control will be implemented during the life of the project.
- 7. Sediment control facilities such as dispersion terraces, ponds, dikes, and infiltration basins will be designed and installed before surface-disturbing activities begin. These facilities will be inspected regularly, and maintained according to the schedule defined in the storm water pollution prevention plan.
- 8. Following construction, cut-and-fill embankments and growth media stockpiles will be seeded with native grasses or covered with salvaged vegetation to reduce the potential for soil erosion and to enhance natural plant reinvasion.
- 9. Unchanneled runoff from disturbed surface areas will be dispersed into undisturbed forest areas, to the extent practicable. This is a key water management feature.
- 10. Engineered facilities and associated construction materials will be monitored during construction, operation, and a defined post-closure period. This will enhance waste management and recycle opportunities.

#### 2.4 Overview of the Reclamation and Closure Process

NMC considers reclamation to be a progressive process directly integrated with the design, construction, operation, and closure of the operation. Reclamation will, therefore, generally occur in the following phases, with some overlap:

- 1. Construction Reclamation,
- 2. Interim Reclamation,
- 3. Temporary Closure,
- 4. Final Reclamation and Closure, and
- 5. Post Closure Monitoring and Maintenance.

#### 2.4.1 Construction Reclamation

Construction reclamation activities will occur during and directly after the exploration tunnel and associated facilities are constructed. This phase of reclamation will involve the removal and storage of topsoil from all areas to be disturbed. During construction, vegetation will be cleared from the surfaces that will be developed, especially the PAG and NAG piles and water treatment facility (WTF). Topsoil and soil-like growth media will be removed where possible and stockpiled for reclamation activities. Topsoil stripping and stockpiling will continue as the exploration facilities are developed.

#### 2.4.2 Interim Reclamation

Interim reclamation is defined as temporary measures for reducing the potential for erosion and sedimentation, and other activities required to protect surface and ground water resources. Interim reclamation will be done to stabilize road cuts, stockpiles and other disturbances that result from construction and exploration activities. Interim reclamation measures may involve seeding, temporary diversions, sedimentation control systems, and other BMPs commonly used for construction and exploration projects. These are listed in the USFS Soil and Water Conservation Handbook (USFS, 1996).

## 2.4.3 Temporary Closure

Temporary closure means the cessation of the exploration activities for a period of between 90 days and 3 years. If conditions require temporary closure to extend beyond 3 years, final reclamation and permanent closure activities would begin unless Niblack is granted an approval for extension by ADNR and ADEC. Temporary closure scenarios that require modifications to the plan of operations or reclamation plan would be coordinated with and submitted to ADNR and ADEC for approval.

Temporary closure may include planned or unplanned cessation of exploration activities. Planned temporary closures that have specific conditions defining their beginning and end include the following:

- Temporary halt in activity to evaluate exploration results and plan further development;
- Ongoing permitting requiring plan amendment based on exploration results; and
- Change in ownership requiring the temporary cessation of operations while operating permits are transferred to the new owner/operator.

Unplanned temporary closures may include the following:

• Closure because of significant weather events;

- Discontinuation of operations due to temporary market conditions or unforeseen labor disputes;
- Interruptions in work schedule due to underground conditions; and
- The discontinuation of operations due to litigation or other legal constraints.

Niblack will notify ADNR (authorized officer) in writing at least 30 days prior to any planned temporary closure of 90 days or longer. For any unplanned temporary closure expected to last 90 days or longer, Niblack would notify ADNR within 10 days of the first day of the temporary closure. These notifications will include a written description of the nature of actions to be implemented by the company to maintain full compliance with applicable permits and plan approvals. If a temporary closure extends beyond 3 years, it is understood that ADNR may deem exploration to be permanently abandoned. This situation would require that final reclamation must commence.

Niblack's objective during temporary closure would be to maintain the site and facilities in a safe condition. This would include proactive temporary sediment and erosion control BMPs. All related water management activities and monitoring would also be carried out by the company.

Notification principles or requirements include the following:

- Reasons for shutdown;
- Estimated schedule for resuming constructions; and
- Outline of reclamation, water management, and monitoring activities to be implemented by NMC during this period.

During temporary closure, Niblack would also maintain compliance with all environmental permits and programs as applicable. Interim reclamation activities would continue as planned. All permit requirements would be met.

#### 2.4.4 Final Reclamation and Permanent Closure

Closure is defined as the cessation of all exploration activities as a result of project completion, or that the further development of the Project is no longer feasible. NMC currently contemplates a 24-month schedule. Final reclamation and closure activities will occur according to the provisions of this reclamation and closure plan, as required by the state.

Notification of final closure would be given to the state agencies 60 days prior to cessation of exploration activities. This notice will include the date on which final reclamation activities would begin. Under the current construction schedule, activities will be initiated in Spring 2007, and cease in the summer of 2009, at which time final reclamation/closure is expected to commence. A reclamation schedule detailing estimated timelines to complete reclamation tasks is provided in Appendix A.

Final reclamation involves final contouring and seeding of waste rock dumps, and other facilities that cannot practicably be reclaimed concurrently during exploration activities. Physical reclamation is estimated to take 9 weeks to complete (Appendix A), and would be completed within approximately two years after cessation of exploration activities.

## 2.4.5 Post Closure Monitoring and Maintenance

Post-closure reclamation activities consist of monitoring and maintenance until closure and reclamation performance standards are achieved. General post-closure reclamation/revegetation monitoring is expected to be required for 3 years, whereas visual and water quality monitoring is expected to be required for up to 30 years (as dictated by relevant ADEC and ADNR permits); this condition would be reviewed annually, and reclamation progress may result in a reduction or extension of the post-closure monitoring period. The post-closure monitoring and maintenance program is discussed in further detail in Section 4 and within the Water Quality Baseline and Site Monitoring Plan (appendix to the Niblack Project Underground Exploration Plan of Operations).

No water treatment is expected to be needed, as the adit closure is designed to prevent drainage through the installation of a concrete plug. The final location and design of the adit plug will depend on ground conditions and ground water quality and quantity. The installation is described in more detail later in this document.

## 2.5 Soil Salvaging, Vegetation Salvaging and Revegetation Methods

#### 2.5.1 Topsoil Salvage and Stockpiling

For the purposes of this plan, the term "growth media" is defined as all native soil material with physical and chemical properties capable of establishing and sustaining vegetation with or without soil amendments. Growth media can also be glacial till. Upland soils in the Niblack area are generally moderately well drained silt or sandy soils spread over bedrock or glacial till. Salvaged material will consist of A and B horizon material and will include some underlying glacial till in order to obtain the required volume.

Topsoil (Horizons A and B) would be salvaged and stored separate from other acceptable growth media (see Figure 4).

Topsoil stripping and stockpiling will continue as the facilities are developed. In some cases, topsoil will be stripped and directly placed on areas undergoing reclamation. All topsoil stockpiles will be located and shaped so that run-on and run-off is controlled. Stockpiled topsoil would be seeded or covered with salvaged vegetation to reduce the potential for erosion during storage and maintain viability. Where adequate topsoil is not available, a replacement scheme involving other growth media would be developed for agency approval.

During reclamation, topsoil would be placed over all disturbed areas selected for reclamation excluding rock cuts, areas of riprap, open water, and slopes too steep to retain topsoil. Development rock storage piles would be treated as described later in this document.

404

4.398

**Parcel** Surface Area to be **Required Topsoil** Number **Description** Reclaimed (ac.) (cubic yards)\* PAG Waste Rock Stockpile Area 0.85 686 1 2 Portal Entrance Area 0.25 202 3 3.10 2,501 NAG Waste Rock Stockpile Area Water Treatment Facility (Sediment Pond) 4 0.75 605

0.5

5.45

A summary of topsoil requirements for reclaiming facilities that require topsoil is as follows:

Total Topsoil Required

Stormwater Management Features

Topsoil stockpile locations are located adjacent to and northeast of the PAG storage site, and northeast of the NAG site. Small stockpiles will also be located immediately adjacent to stormwater management facilities. Topsoil stockpile areas that become full would have topsoil relocated to surrounding laydown areas for alternative storage space.

Vegetation cleared during development, and not consumed for other purposes during construction, will be stockpiled for reclamation use. Salvaged vegetation and roots will be stockpiled on top of and adjacent to soil stockpile areas, which will aid erosion control of soil stockpiles (Figure 4). Salvaged material will be placed back on top of replaced topsoil on reclaimed areas to reduce soil erosion and promote revegetation with native species.

A minimum of 6 inches of topsoil is the goal for application to disturbed areas. Topsoil is expected to be limited, based on measured depths of the A- and B-horizons throughout the planned disturbance area: Therefore, an average application rate of one-half of one foot has been used for the inventory calculations. As indicated under the reclamation principles discussed above, an updated inventory of suitable soil or soil-like growth media (organic material and/or suitable subsoil) will be carried out during the first 6 months of construction. This inventory will distinguish between the actual "topsoil" and other growth material. A photographic inventory of the storage sites will also be maintained by Niblack.

#### 2.5.2 Revegetation Methods and Materials

The overall goal of disturbed site revegetation is to mimic the adjacent undisturbed vegetation communities, to the extent possible. However, the focus of the revegetation effort will be on establishing grasses, shrubs, and forbs to stabilize the reclaimed landforms and to provide successful plant communities that would lead to the natural recolonization of the appropriate vegetation community.

In general, revegetation methods and materials will be as follows:

Growth Media Placement and Grading. Topsoil salvaged from the disturbed areas will be used for the growth media source (see Section 2.5.1 above). A minimum of 6 inches of stockpiled topsoil will be placed and graded over areas identified in Section 3 as requiring topsoil. Niblack

<sup>\*</sup> Based on 0.5 foot average cover.

acknowledges that during the distribution process, some areas may receive more or less material than the target numbers; however, the average distribution of topsoil within a particular site will be near the target depth.

*Growth Media Scarification.* Where necessary, growth media will be scarified. A roughened configuration will serve to trap moisture, reduce wind shear, minimize surface erosion by increasing infiltration. These areas will also serve to create micro-habitats conducive to seed germination and revegetation.

**Seeding.** The focus of initial revegetation is on establishing grasses for growth media stabilization that allow successional plant communities of forbs, alder, and native evergreen species. All of the construction and development activities are scheduled to take place solely in upland areas. Therefore, the seed mix proposed for reclamation is as follows:

Upland Sites					
Species	<b>Percent Seed Mixture</b>				
Boreal red fescue (Festuca rubra)	30				
Nortan tufted hairgrass (Deschampsia caespitosa)	60				
Blue joint (Calamogrostis Canadensis)	10				

Consideration will be given to inclusion of a 10 percent annual rye grass mix for treatment of localized areas subject to high erosion potential. Selective application of erosion blankets may also be used in these locations.

Native Alaskan plants are available through various suppliers in Alaska and will be pursued as the preferred species as recommended by agency specialists. The species list for the project site is based on current and projected availability of native species and their projected success.

Revegetation will be implemented using broadcast seeding. Because of rough terrain, restricted access and relatively small acreage of disturbance of areas being reclaimed, for costing purposes it has been assumed handseeders will be used to spread seed. Generally, seeding will be implemented from spring (May) until mid-September, during periods with minimum standing water to maximize germination. Seed will be applied at the rate of 30 to 45 pounds per acre (pure live seed).

#### 2.6 Reclamation Performance Criteria

#### 2.6.1 General Reclamation Completion Criteria

The Project will be considered successfully reclaimed when all activities identified in the plan have been completed. This will include facility and reclamation shutdown and reclamation tasks such as relocation of PAG waste rock, portal closing, regrading and revegetation, in accordance with the facility-specific plans described below in Section 3. NMC will seek release of the reclamation surety on a phased basis, as quantitative data indicate that the agreed-upon

reclamation and revegetation criteria have been met. The following summarizes general site reclamation and closure completion criteria proposed by NMC for the project.

- 1. All applicable activities have been completed consistent with the reclamation plan, including demolition, regrading, and other applicable activities.
- 2. Absence of erosional features of sufficient size and/or density to effect long term stability and vegetation cover. Any reclaimed area of 0.5 acres or more which exhibits more than 10 rills and gullies greater than 6 inches deep (or other erosional feature that clearly effects long term stability) will be filled with borrow material, regraded and seeded. Remediation of the site drainage contributing to the rills and gullies will be completed. Subsequent inspections will be completed to verify rills and gullies do not persist.
- 3. Establishment of vegetative cover meeting the revegetation success criteria (Section 2.6.2 below). If vegetative cover does not meet the success criteria three years after seeding, Niblack will assess the conditions and initiate mitigation, such as fertilizer, seed mixture change, re-seeding, or remediation of soil contamination. If two years after these specific mitigation efforts are implemented and the site still does not meet the criteria, then Niblack will submit a plan to the state for approval and propose further action, consisting of either remedial measures or criteria modification.
- 4. Establishment of plant diversity. If after three years a diverse plant community cannot be re-established at the site using the above-mentioned seed mix and reclamation activities, Niblack will assess the condition and determine appropriate action(s). If two years after these specific mitigation efforts are implemented and the site still does not meet the criteria, then Niblack will submit a plan to the state for approval and propose further action, consisting of either remedial measures or criteria modification.
- 5. Establishment of natural succession. Natural succession will be determined by the plant species present for a given site, and be considered successful if two or more native species from natural succession are present and the site is free of invasive species (to the extent practicable). If after three years natural succession has not been established, Niblack will assess the condition and determine appropriate action(s). If two years after these specific mitigation efforts are implemented and the site still does not meet the criteria, then Niblack will submit a plan to the state for approval and propose further action, consisting of either remedial measures or criteria modification.

#### 2.6.2 Revegetation Success Criteria

Niblack and appropriate regulatory agency personnel would monitor vegetation success qualitatively by visual inspection on an ongoing basis and quantitatively once per year.

Quantitative analysis would be conducted at the end of the growing season (end of August) by a qualified state representative or an independent professional.

Revegetation criteria will be used to quantify revegetation success. Undisturbed reference sites will be used to judge revegetation performance for reclaimed areas. The reference sites will be used to assess the existing percent aerial cover required as release criteria. Representative reference sites will be selected and agreed upon by the ADNR and Niblack.

## 2.7 Updating the Reclamation Plan

The reclamation plan will be updated or modified if the project is materially changed. As-built maps will be compiled to delineate actual areas of disturbance and areas and quantities estimated in the previous plan. Additional information including characterization of site conditions and soils, closure water quality standards, and data compiled from ongoing monitoring will be considered in revising the reclamation plan. A final closure plan and schedule will be prepared 6 months prior to closure.

The reclamation bond will be recalculated each time that the reclamation plan is updated. The updated bond calculation will include adjustment to reclamation quantities based on current conditions at the time the estimate is prepared, adjustments to labor and equipment rates, appropriate adjustments to indirect rates, and recalculation of the estimated inflation cost. The reclamation plan will be submitted to ADNR and ADEC for review and comment during each revision. Any modifications to the Reclamation Plan must be approved by the responsible agencies.

#### 2.8 Invasive Weed Controls

Niblack is committed to the control of invasive weeds at the site. Any equipment mobilized to the site will be adequately power washed prior to transport to the site. The treated sites would be monitored by qualified Niblack personnel in order to identify and eradicate invasive species as they are discovered to the extent practicable. ADNR reclamation specialists will be consulted to insure this objective is accomplished.

#### 3.0 FACILITY-SPECIFIC RECLAMATION AND CLOSURE PLANS

## 3.1 Site Disturbance Summary

For the purposes of this reclamation and closure plan, the Niblack Construction/Exploration Project has been delineated into five primary reclamation zones or task areas (Appendix A and B). These represent the main areas of disturbance for construction and exploration activities that are to be reclaimed.

Facility-specific reclamation plans including goals and objectives, reclamation and closure tasks, post-closure monitoring and maintenance, and estimated reclamation costs are described below for each of the task areas. Acreage of disturbance for the various facilities is tabulated in Section 2.5.1. These plans form the basis for the reclamation cost estimate provided as Appendix B, Reclamation Cost Estimate - Niblack Exploration Project.

Temporary closure plans (a requirement for the ADEC Industrial Solid Waste Landfill permit application) are described above in Section 2.4.3. During temporary closure NMC will maintain the site and facilities in a safe condition. This would include proactive temporary sediment and erosion control BMPs. All related water management activities and monitoring would also be carried out by the company.

## 3.2 Task 1 – PAG Facility (Waste Rock Relocation and Site Reclamation)

Reclamation activities in the PAG waste rock facility (temporary storage facility) will commence once the exploration activities have been terminated (Figure 4; Appendix A and B). Concurrent reclamation opportunities at adjacent cut and fill slopes will be continuously assessed during operations to determine if stabilization of the area can be achieved prior to the closure period.

The reclamation and closure plan for the PAG temporary storage facility is a requirement of the Industrial Solid Waste Permit Application, and is prepared in accordance with 18 AAC 60.200, 18 AAC 60.485(b), and 18AAC 60.485(d). The table which follows provides a breakdown of development rock generated during the project. In total about 60,900 yd<sup>3</sup> will be generated, including 14,300 yd<sup>3</sup> of PAG material.

## Estimated Volumes of Potentially Acid-Generating Waste Rock Produced By The NMC Exploration Drift

			Chemical Analyses			PAG Rock <sup>1</sup>		
Unit	Length Tunnel (ft)	PAG <sup>1</sup> NP/MPA <3 (number samples)	NAG <sup>2</sup> NP/MPA >3 (number samples)	PAG <sup>1</sup> (%)	Tunnel Length (ft)	Volume in-situ <sup>3</sup> (ft <sup>3</sup> )	Volume in-situ <sup>4</sup> (yd <sup>3</sup> )	Volume as waste <sup>5</sup> (yd <sup>3</sup> )
Hanging Wall	4,440	6	52	10%	459	86,810	3,247	4,383
Lookout Foot	275	11	15	42%	116	21,989	822	1,110
Wall	1,225	14	7	67%	817	154,350	5,773	7,793
Totals:	5,940	31	74		1,392	263,149	9,842	14,300 <sup>6</sup>

Notes:

- 1. PAG = Potentially Acid-Generating/Potentially Metals Leaching rock, defined as: (neutralizing potential) / (maximum potential acidity) <= 3.
- 2. NAG= Non Acid Generating Rock, defined as: (neutralizing potential) / (maximum potential acidity) >3
- 3. Nominal 13.5 X 14 ft tunnel dimension multiply linear footage totals by 189 to get cubic footage (unbroken).
- 4. Volume in cubic yards = cubic ft \* 0.0374.
- 5. Waste volume assumes 45% expansion of waste relative to in-situ volume.
- 6. Adjusted for additional expansion factor.

#### 3.2.1 Reclamation Goals and Objectives

Reclamation activities for the potentially acid-generating/potentially metals leaching (PAG) waste rock storage site are focused on protecting local surface and ground water quality long-term after the cessation of the project, and returning the land to a safe and stable condition, suitable for use as wildlife habitat. PAG waste rock will be removed and placed back underground, followed by grading, stabilization, and establishment of a long-term, self-sustaining vegetation community.

## 3.2.2 Reclamation and Closure Tasks

About 14,300 yd<sup>3</sup> of potentially acid-generating (PAG) material at the engineered temporary storage facility will be placed back underground at the southern-most segment of the adit (-4.7% decline). Material would be hauled, end-dumped, and pushed in a typical backfill mode. Other activities include removal of the HDPE liner and disposal underground, and reclamation of other water management structures (collection sumps, etc.). Topsoil and/or growth media will be used to cover the footprint of the site, and the area will be seeded. The PAG site would then be recontoured, and stormwater conveyance cleaned and stabilized. Figure 4 shows the anticipated ultimate disturbance footprint for the temporary PAG waste site and Figure 5 provides a conceptual cross section of the PAG pile.

## 3.2.3 Post-Closure Monitoring and Maintenance

Post-closure monitoring and maintenance for the PAG site will evaluate the success of vegetation, and provide periodic maintenance of erosion controls if required. Section 4 describes the scope of anticipated monitoring and maintenance programs. Post-closure monitoring is also a requirement of the SWPPP and relevant ADEC waste management permits. These programs will all be integrated into a single monitoring scheme.

#### 3.2.4 Estimated Reclamation and Closure Costs

Closure costs for the PAG temporary storage site are outlined in Appendix B (Task 1), and are estimated at approximately \$163,968. This subtotal includes cost of hauling waste underground, earthworks to regrade the rock storage facility, place growth media, and seeding the area.

## 3.3 Task 2 – Adit Plug and Portal Entrance Reclamation

Reclamation activities for the Adit and Portal Entrance area will commence once all PAG waste has been relocated back underground (Figure 4; Appendix A & B).

## 3.3.1 Reclamation Goals and Objectives

A cement plug will be installed to seal the PAG waste rock in the adit to prevent seepage. All temporary structures at the portal entrance not required for designated post-closure land uses will be removed from the property, followed by grading, stabilization, and establishment of a long-term, self-sustaining vegetation community.

#### 3.3.2 Reclamation and Closure Tasks

The 14.5 ft. x 13 ft adit involving some 6,000 ft. of drift will be closed after the backfill is complete using a cement plug and pushed NAG material (about 250 cy) at the portal. The exact location of this plug will be determined at cessation of all exploration activities based on actual underground geotechnical conditions, safety and ground water quality and quantity. The oversized plug "zone" would be grouted to limit hydrostatic pressures and adit drainage. The portal entrance/laydown area, which involves about 0.25 acres, would be cleared of all buildings and/or appurtenances and utilities. The area would then be topsoiled and seeded. The stormwater conveyance network would be stabilized for long-term stormwater management.

#### 3.3.3 Post-Closure Monitoring and Maintenance

Post-closure monitoring and maintenance for the adit and portal area will evaluate the success of vegetation, and provide periodic maintenance of erosion controls if required. Section 4 describes the scope of anticipated monitoring and maintenance programs. Post-closure monitoring is also a requirement of the SWPPP and relevant ADEC waste management permits. These programs will all be integrated into a single monitoring scheme.

#### 3.3.4 Estimated Reclamation and Closure Costs

Closure of the adit, including installation of an engineered cement plug and regrading the portal entrance is estimated at \$170,234 , Appendix B (Task 2). Cost for contingency (10%) and indirect costs are not included in the subtotal. Appendix B includes detailed analysis of unit cost, production and other assumptions used to estimate cost for each item.

## 3.4 Task 3 - NAG Waste Rock Storage Area

Reclamation activities in the NAG waste rock storage area (Figure 4; Appendix A and B) will commence once the exploration activities have been terminated. Concurrent reclamation opportunities will be continuously assessed during operations to determine if stabilization of the area can be achieved prior to the closure period. The table which follows provides a breakdown of development rock generated during the project. In total about 60,900 yd<sup>3</sup> will be generated, including 46,600 yd<sup>3</sup> of NAG material.

Estimated Volumes of Non Acid-Generating Waste Rock Produced										
By The NMC Exploration Drift										
			Chemical Analyses				NAG Rock <sup>2</sup>			
Unit	Tunnel Length (ft)	PAG <sup>1</sup> NP:MPA <3 ( number samples)	NAG <sup>2</sup> NP/MPA >3 (number samples)	NAG <sup>1</sup> (%)		Tunnel Length (ft)	Volume in-situ <sup>3</sup> (ft <sup>3</sup> )	Volume in-situ <sup>4</sup> (yd <sup>3</sup> )	Volume as waste <sup>5</sup> (yd³)	
Hanging Wall	4,440	6	52	90%		3,981	752,350	28,138	37,986	
Lookout	275	11	15	58%		159	29,986	1,121	1,514	
Foot Wall	1,225	14	7	33%		408	77,175	2,886	3,897	
Totals:	5,940	31	74			4,548	859,511	32,146	46,600 <sup>6</sup>	

Notes:

- 1. PAG=Potentially Acid-Generating/Potentially Metals Leaching rock, defined as: (neutralizing potential) / (maximum potential acidity) <= 3.
- 2. NAG=Non-Acid-Generating Rock, defined as: (neutralizing potential) / (maximum potential acidity) > 3
- 3. Nominal 13.5 X 14 ft tunnel dimension multiply linear footage totals by 189 to get cubic footage (unbroken).
- 4. Volume in cubic yards = cubic ft \* 0.0374.
- 5. Waste volume assumes 45% expansion of waste relative to in-situ volume.
- 6. Adjusted for additional expansion factor.

## 3.4.1 Reclamation Goals and Objectives

Reclamation activities will focus on closure of the development rock (NAG) site. The development rock site will be graded and stabilized and protected from erosion. The reclaimed surface will be treated to establish a long-term, self-sustaining vegetation community.

#### 3.4.2 Reclamation and Closure Tasks

During construction and operation of the underground access tunnel, it is estimated that approximately 46,600 cubic yards of development rock will be produced and placed within the NAG waste rock disposal area. Figure 4 shows the anticipated ultimate disturbance footprint for the development rock deposit and Figure 5 provides a conceptual cross section of the NAG pile. During closure, the deposit will be graded to reduce the slope to conform to local topography in a stable configuration.

The closure surface will be graded using an excavator to cut material from the upper section of the slope and fill along the slope toe. The conceptual grading plan shows a final crest elevation that will be back sloped during grading to reduce runoff to the slope face. Final contouring of the material will be dependent upon the quantity of rock placed in the facility, and grading will likely include a mid-slope bench to reduce the length of the continuous slope. A volume of approximately 18,250 cubic yards of grading at closure was estimated for the conceptual closure surface.

The graded development rock surface will be covered with a minimum thickness of 6 inches of topsoil or other growth media that will be obtained from the stockpile. The treated surfaces will be scarified with an excavator along contour where practical and seeded using the upland seed mixture presented in Section 2.5.2.

## 3.4.3 Post-Closure Monitoring and Maintenance

Post-closure monitoring and maintenance for the NAG facility will evaluate the success of vegetation, and provide periodic maintenance of erosion controls if required. Section 4 describes the scope of anticipated monitoring and maintenance programs. Post-closure monitoring is also a requirement of the SWPPP and relevant ADEC waste management permits. These programs will all be integrated into a single monitoring scheme.

#### 3.4.4 Estimated Reclamation and Closure Costs

Closure costs for the NAG waste rock storage site are outlined in Appendix B (Task 3), and are estimated at approximately \$24,202. This subtotal includes cost of earthworks to regrade the development rock storage facility, place growth media, and seeding the area. Cost for contingency (10%) and indirect costs are not included in the subtotal. Appendix B includes detailed analysis of unit cost, production and other assumptions used to estimate cost for each item.

## 3.5 Task 4 – Water Treatment Facility and Settlement Ponds (WTF)

At closure, the Water Treatment Facilities (WTF) and ponds would be filled after the geosynthetic liners are cut, folded, and sealed in place (Figure 4; Appendix A and B). Fill

material from the NAG pile would be used. Drip emitter lines, piping conveyance and all other appurtenances and utilities would be removed from the area for reuse, and/or demolition and shipment offsite, and/or disposed underground. The WTF and sediment pond areas would then be regraded and topsoil applied, followed by seeding.

#### 3.5.1 Reclamation Goals and Objectives

The primary reclamation goal for the water treatment facility is to return the land to a safe and stable condition, suitable for use as wildlife habitat and for recreational use. Closure may include converting part of the facility to a wetland, otherwise, upland species as listed in section 2.5.2 will be used.

#### 3.5.2 Reclamation and Closure Tasks

Once water quality is deemed to be stable, based on successful adit closure, and capping and revegetation of the associated waste facilities, ponds will be drained, the liners will be cut and folded back and the area can then be regraded leaving a portion of the facility shallow to provide ponding and the establishment of a shallow wetland feature.

#### 3.5.3 Post-Closure Monitoring and Maintenance

Post-closure activities for the water treatment facility will consist of monitoring the wetland area to evaluate the success in establishment of a long-term, self-sustaining wetland community. Section 4 describes the scope of anticipated monitoring and maintenance programs. Post-closure monitoring is also a requirement of the SWPPP and relevant ADEC waste management permits. These programs will all be integrated into a single monitoring scheme.

#### 3.5.4 Estimated Reclamation and Closure Costs

Closure costs are outlined in Appendix B (Task 4) and are estimated at approximately \$18,950. This subtotal includes cost for hauling fill, removing piping (including land application drip emitters) regrading, seeding and planting. Cost for contingency (10%) and indirect costs are not included in the subtotal. Appendix B includes detailed analysis of unit cost, applications and other assumptions used to estimate cost for each item included.

## 3.6 Task 5 – Stormwater Management Areas

Stormwater capture, conveyance, settling, and dispersion structures down gradient of the NAG site will be closed and reclaimed following stabilization of the reclaimed NAG waste pile and water quality has been shown to return to approximate pre-exploration quality (Figure 4; Appendix A and B). The activity would include placement of the originally excavated soil (stored beside the storm management structures) back into the diversion ditches, sediment ponds and sediment traps. The backfill will be graded to mimic the surrounding topography, and reseeded. Stormwater management structures associated with the access road will be retained,

and maintained in accordance OHM&P and COE permit stipulations, in order to keep the access road available for designated post-closure land use.

#### 3.6.1 Reclamation Goals and Objectives

The primary reclamation goal for the stormwater management areas is to return the land to a safe and stable condition, suitable for use as wildlife habitat and for recreational use.

#### 3.6.2 Reclamation and Closure Tasks

Reclamation activities to final contour the stormwater management facilities will be completed once facilities are no longer required. This will be accomplished prior to Niblack leaving the site. Natural succession of upland species from surrounding areas will occur once activities within the area are discontinued. Niblack will monitor the success of establishing upland habitat prior to closure and determine if any additional reclamation measures are required.

Filling and grading of the areas will be completed to contour and smooth the area. A minimum of 6 inches of topsoil or other growth media will be placed on the sites. The sites will be scarified along contour and seeded using the upland seed mixture presented in Section 2.5.2.

## 3.6.3 Post-Closure Monitoring and Maintenance

Post-closure activities for the storm water management areas will consist of monitoring and maintenance of BMPs for erosion control and monitoring of seeded areas to evaluate revegetation success. Section 4 describes the scope of anticipated monitoring and maintenance programs. Post-closure monitoring is also a requirement of the SWPPP and relevant ADEC waste management permits. These programs will all be integrated into a single monitoring scheme.

#### 3.6.4 Estimated Reclamation and Closure Costs

Closure costs for the stormwater management facilities are estimated at \$5,857, and are outlined in Appendix B (Task 5). This subtotal includes cost for regrading the area growth media placement and seeding. It does not allow for a contingency (10%) and indirect costs; these are included separately. Appendix B includes unit cost, production and other assumptions used to estimate cost.

#### 4.0 RECLAMATION ASSURANCES

## 4.1 Summary of Estimated Reclamation Costs

Cost estimates for reclaiming and closing each facility are discussed above in Section 3. The total estimated cost to reclaim the Niblack Exploration Project, including post-closure monitoring, is \$1,237,317. This total includes \$643,436 of direct costs to complete the physical reclamation, and \$519,069 of indirect costs, inflation and contingency. The cost breakdown tables and supporting assumptions are presented in Appendix B. The cost estimates were compiled from contractor bids for work currently being done at Niblack and from current equipment rental estimates. They reflect actual site conditions, topography, and equipment and utilization factors that are representative of Southeast Alaska. The following table provides a summary of closure cost for each area discussed in Section 3.

SUMMARY OF ESTIMATED RECLAMATION COST								
Task Numbe	Task Number Reclamation Task Cost							
Task 1	Task 1 Relocation of PAG and site reclamation							
Task 2	Portal closure, plugging, and site reclamation	\$170,234						
Task 3	Fill placement and grading, final contouring at NAG site	\$24,202						
Task 4	Reclaim water treatment facilities site and sediment pond areas	\$18,950						
Task 5	Reclaim stormwater management system	\$5,857						
	Equipment mobilization and demobilization	\$46,400						
	Personnel transport	\$12,240						
	Equipment standby	\$34,114						
	Support equipment including barge camp	\$167,469						
Subtotal		\$643,436						
Contractor O	verhead (10%)	\$63,344						
Contractor Pr	\$96,515							
Engineering 1	\$32,172							
Scope Contin	gency 10%	\$64,344						
Bid Continge	\$64,344							
Agency Over	sight	\$8,650						
Contract Perf	\$19,303							
Direct and I	ndirect Costs Subtotal	\$993,107						
Inflation at 3	.2% per year for 5 years	\$169,397						
<b>Total Tasks</b>	\$1,162,505							
Task 6	Reclamation and Water Quality Monitoring (including 3.2% inflation per year)	\$68,011						
Bid Continge	ncy (10%)	\$6,801						
Total Task 6	(including 3.2% inflation per year)	\$74,813						
	Grand Total = \$1,237,317							

## 4.2 Long-Term Monitoring and Maintenance Program

A long-term monitoring and maintenance (LTMM) program is included with the reclamation and closure plan cost estimates discussed above. Specific LTMM plans regarding each facility and parcel are discussed above in Section 3. Modifications to the LTMM program will be consistent with the periodic reclamation and closure plan review. It is expected that historical data would play a key role in developing specific future LTMM program amendments.

Post-closure visual and water quality monitoring will be performed according to the Water Quality Baseline and Site Monitoring Plan (appendix to the Niblack Project Underground Exploration Plan of Operations), and as stipulated in ADEC waste management permits. The currently proposed schedule includes post-closure visual and water quality monitoring performed once annually in years 1, 2, 5, 10, 20 and 30. During periods of Temporary Closure, monitoring will be quarterly.

During exploration activities, inspections and monitoring will be part of the normal project operation and maintenance schedule. Therefore, important information necessary for developing detailed post-closure monitoring and maintenance schedules and costs and related financial assurance requirements would be collected during this time. This would involve special efforts necessary to document unusual climatic events that could result in extraordinary maintenance needs. Monitoring would continue after exploration ceases and would include inspections during the vegetation reestablishment period. The LTMM schedule would include the following:

- Visual and water quality monitoring as required by applicable permits still in force.
- Sediment and debris build-up in the diversions would be assessed annually during operation.
- Annual inspections of the site would occur during the first 3 years after cessation of exploration activities, or until release from the reclamation surety.
- Any necessary remedial work would be carried out as needed, based on site inspections (any corrective action required that falls under ADEC waste management permit authority would be as detailed in the Water Quality Baseline and Site Monitoring Plan).
- Maintenance of the physical integrity of the adit portal closure, diversions, and roads.

Soil and vegetation monitoring will also include all reclaimed areas (site-wide) and with inspections and maintenance activities planned during years 1, 2, and 3 during the post closure period. This program will focus on monitoring reclaimed areas for vegetation success and

identifying and correcting any erosion problems. Vegetation surveys will be completed during each year to evaluate revegetation success criteria.

Goals for the Niblack Exploration Project reclamation were described above in Section 2. The objective of the LTMM program is to monitor the success of reclamation by comparing monitoring results with performance standards associated with each reclamation goal. Reclamation bond release or initiation of contingency actions can be triggered if a reclamation goal is met or not.

## 4.3 Indirect Costs, Contingency and Inflation

Indirect costs have been either included in the cost estimate as line items or applied as a percentage of the direct cost total. The approach used in estimating each indirect cost is discussed below.

#### 4.3.1 Mobilization/Demobilization

A separate mob/demob allowance of \$46,400 is provided in the estimate. An allowance of \$12,240 is also shown for the cost for personnel transportation (boat or floatplane) and periodic deliveries (landing craft). Demobilization cost includes cost for removing salvaged equipment and materials, and demobilization of construction equipment.

#### 4.3.2 Contractor Overhead and Profit

Overhead and profit were estimated at 10% and 15% respectively, as a percentage of the total estimated direct costs. Contractor overhead totals \$64,344, and contractor profit totals \$96,515.

#### 4.3.3 Other Indirect Costs

Other indirect costs were estimated as a percentage of the total estimated direct costs. Engineering and redesign are estimated at 5% of direct costs (Tasks 1 through 5), and totals \$32,172.

#### 4.3.4 Contingency

A 10% scope contingency and a 10% bid contingency was applied to all direct cost estimates, each totaling \$64,344.

#### 4.3.5 Agency Oversight

A cost estimate for agency oversight of the reclamation totals \$8,650. This total is based an two trips by ADNR and ADEC during active reclamation and 3 follow-up site inspections in post-closure years 1, 2 and 3. It was assumed the oversight would be completed by one ADNR staff person from the Fairbanks office, and one ADEC staff person from the Juneau office.

## 4.3.6 Contract Performance and Payment Bond

A contract performance and payment bond of 3% of the total direct costs totals \$19,303.

#### 4.3.7 Inflation Cost

Inflation was added to the total direct and indirect cost to account for the potential period for time that could elapse between updating the reclamation plan and completing reclamation activities. A five year term is used for calculating inflation assuming that the project forfeits the bond at the end of the 30 month cycle for updating the reclamation plan, that one year passes before reclamation begins, and that reclamation occurs over a two year period. A construction cost inflation rate of 3.2 percent was used to calculate the inflation cost. Additional information on the inflation cost calculation is presented in Appendix B.

Inflation for Task 6, reclamation and water quality monitoring, was calculated based on individual sub-tasks and is included in the Task 6 total cost estimate. Post-closure water quality sampling is anticipated to be performed once annually for years 1, 2, 5, 10, 20 and 30.

#### 4.4 Post-Closure Financial Assurance

For the purposes of reclamation bonding, there will be three distinct phases of closure:

- Phase I will cover the period after operations cease and reclamation is actively under way.
- Phase II will cover the period after final reclamation has been completed; monitoring and maintenance would be ongoing. Phase II bonding would still be provided by the reclamation bond.
- Phase III will cover the period when all agencies accept the reclamation effort and release the bonds. Phase III financial assurance would be provided in accordance with the negotiated terms.

Niblack will provide an acceptable financial assurance as a condition of the approval for the Plan of Operations. Niblack anticipates applying for partial release of reclamation surety bond monies in subsequent years following cessation of exploration activities, as allotting credit for successfully completed discrete reclamation procedures reduces the final reclamation costs. A full release of the surety would be requested when all requirements of the final reclamation and closure plan have been met. The funds for long-term monitoring and maintenance costs, however, would still be guaranteed by establishment of a trust agreement.

In the event a new operator assumes control of the project, the new operator or landowner would agree to assume full responsibility for the reclamation and maintenance of all affected land and structures that are the subject of these principles. The new owner/operator would also be required to assume all related permit conditions that may apply to the overall reclamation process. The

new operator would transfer to its name all applicable state and federal permits and provide evidence that a surety acceptable to the agency covering the reclamation of disturbed land, including post-closure monitoring and maintenance, is filed.

#### 5.0 ADMINISTRATIVE INFORMATION AND LIST OF PROPERTIES

## 5.1 Project Ownership and Contact Information

Owner/Operator: Niblack Mining Corp.

Suite 615 – 800 West Pender Vancouver, British Columbia

Canada V6C 2V6

U.S. Incorporation: Abacus Alaska Inc.

c/o Guess & Rudd (The Law Offices of)

Suite 700, 510 L Street Anchorage, AK 99501-1986

U.S.A.

Contact: Darwin Green, M.Sc. P. Geo

Vice President Exploration Niblack Mining Corporation

Suite 615 – 800 West Pender Street Vancouver, B.C. V6C 2V6 Canada

Telephone: (604) 484-5045

All notices or other communication related to the Reclamation Plan under 11 AAC 97.310 are to be directed to the Contact listed above.

#### 5.2 List Of Properties And Claims Where Work Will Be Conducted

The Niblack property is located approximately 30 miles southwest of the town of Ketchikan in the mouth of Moira Sound, Prince of Wales Island on Craig A 1 USGS Map Quadrangle geographic map sheet (Figure 1). The property is composed of 17 patented claims, 101 staked federal lode claims and 2 Alaska State tideland claims (Figure 6). The claims are within Township 78 South, Range 88 East, Copper River Meridian, Sections 27, 28, 29, 32, 33, 34 and 35; and Township 79 South, Range 88 East, Copper River Meridian, Sections 1, 2, 3 and 4, Ketchikan Recording District, Alaska. All claims are owned 100% by Niblack Mining Corp. subject to a variable 1%-3% NSR to Barrick Gold Corp. and a 15% NPI to Cook Inlet Region Inc. ("Cook Inlet"), an Alaska Native Corporation.

Work will be conducted on patented claims within mineral survey numbers 533, 644, and 1437 as described below (Figure 6).

Patented claims controlled by Niblack Mining Corporation							
Mineral Survey #	Recording District	<u>Claim(s)</u>					
533	Ketchikan <sup>1</sup>	Parcel No. 1: Lookout Lode (Mining Claim), Conundrum Lode (Mining Claim), Conundrum Extension Lode (Mining Claim), Blue Bell <sup>2</sup> Lode (Mining Claim), West Mammoth Lode (Mining Claim), East Mammoth Lode (Mining Claim).					
644	Ketchikan	Parcel No. 2: Judge Lode (Mining Claim), Bradford Lode (Mining Claim), Jefferson Lode (Mining Claim), Forest Lode (Mining Claim), Iron and Copper Lode (Mining Claim), Luella Lode (Mining Claim).					
1437	Ketchikan	Parcel No 3: Mary Lode (Mining Claim).					
1438	Ketchikan	Parcel No. 4: Pride Lode (Mining Claim).					
1436	Ketchikan	Parcel No. 5: Snow Flake (Mining Claim).					
1585	Ketchikan	Parcel No 6: Beach Lode (Mining Claim).					
1009	Ketchikan	Trio Lode (Mining Claim), Broadgauge Lode (Mining Claim)					

<sup>&</sup>lt;sup>1</sup> Ketchikan Recording District, First Judicial District, State of Alaska.
<sup>2</sup> In some documentation, listed as **Blue Belle** claim.

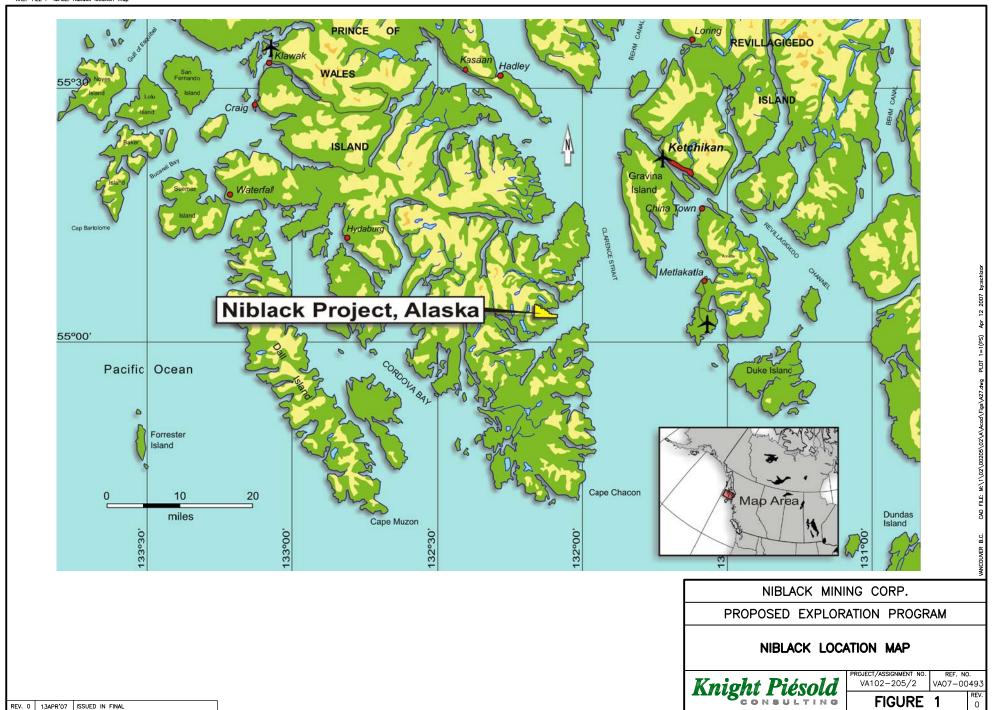
## 6.0 REFERENCES CITED

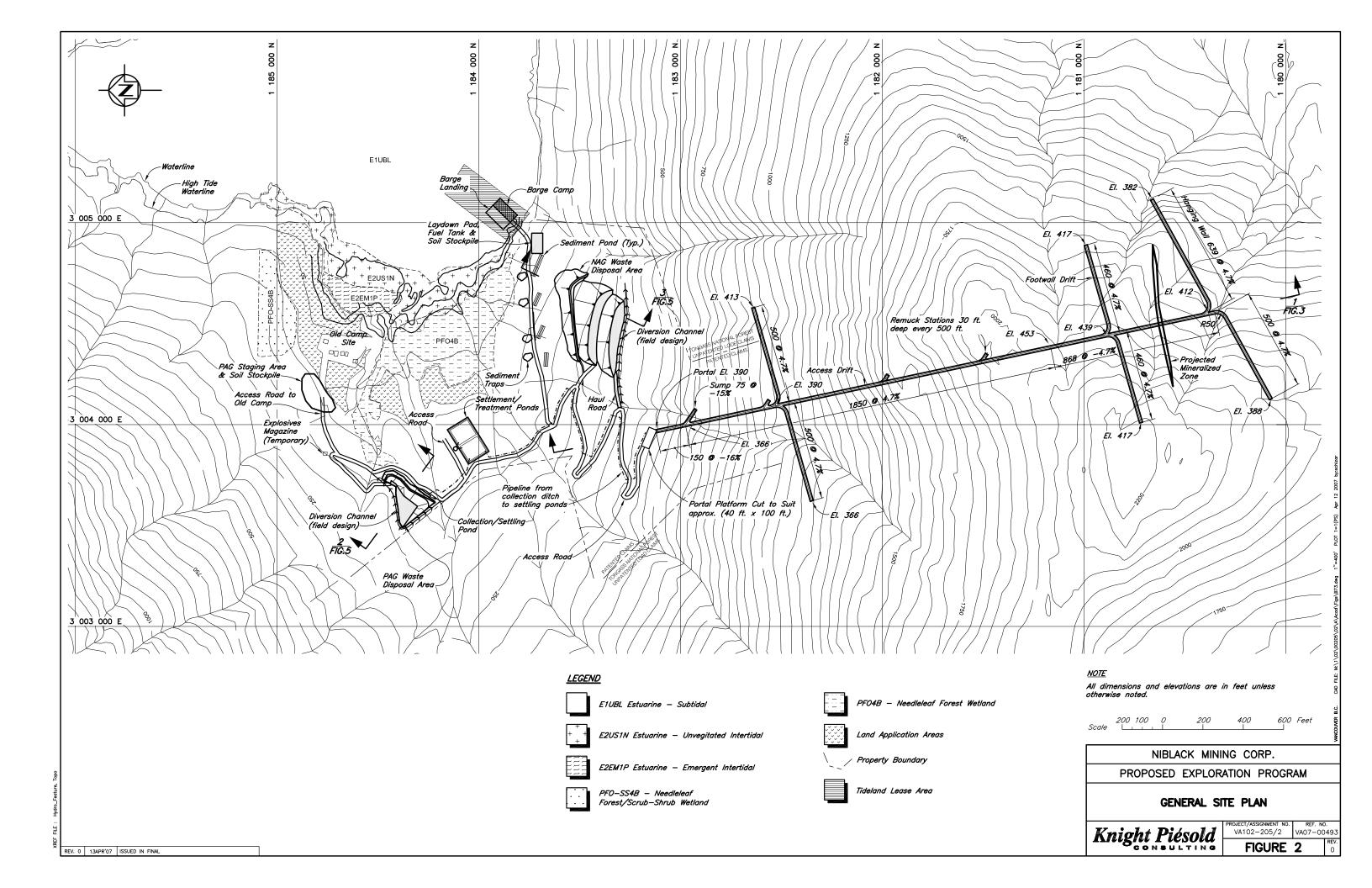
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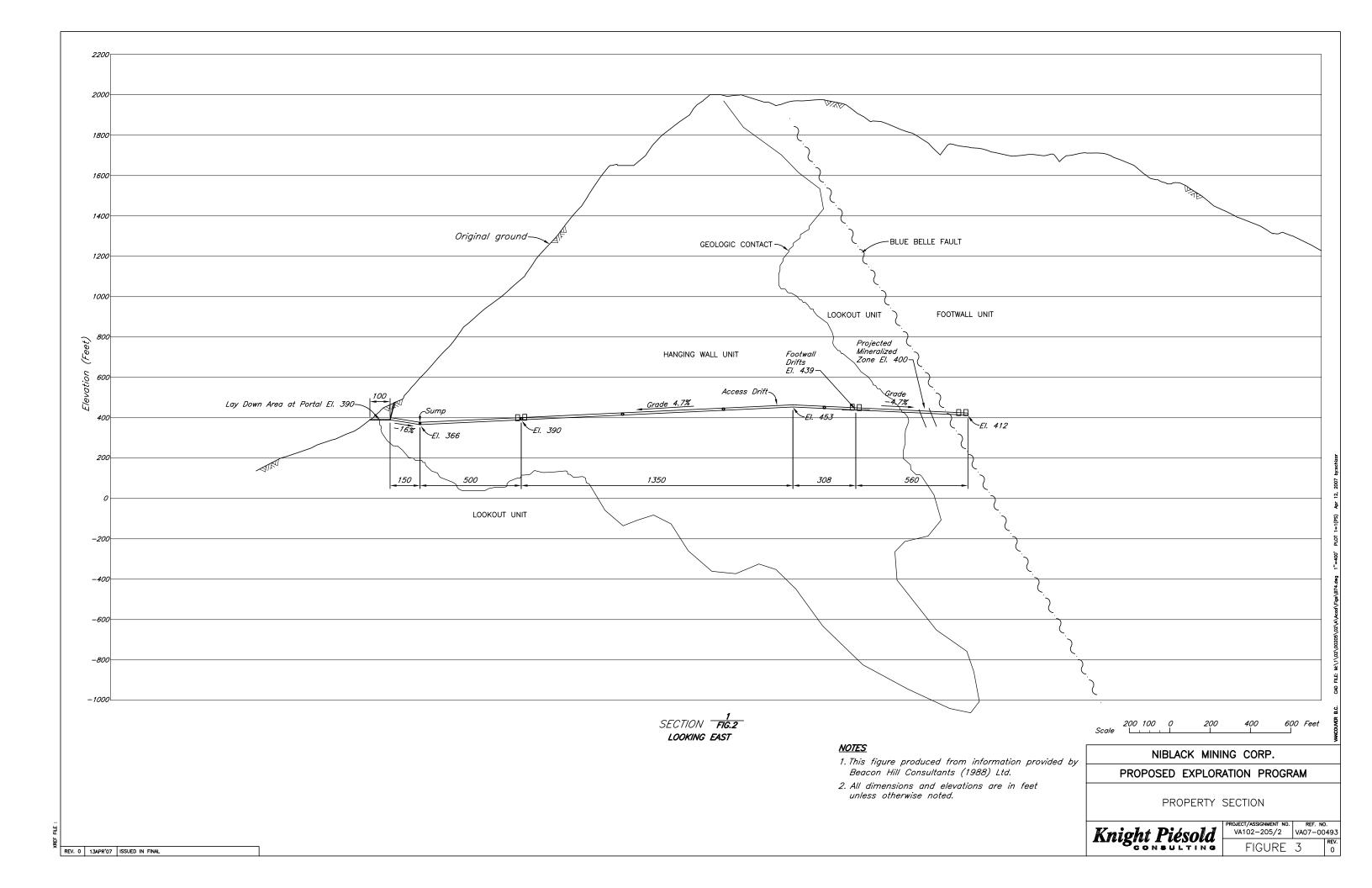
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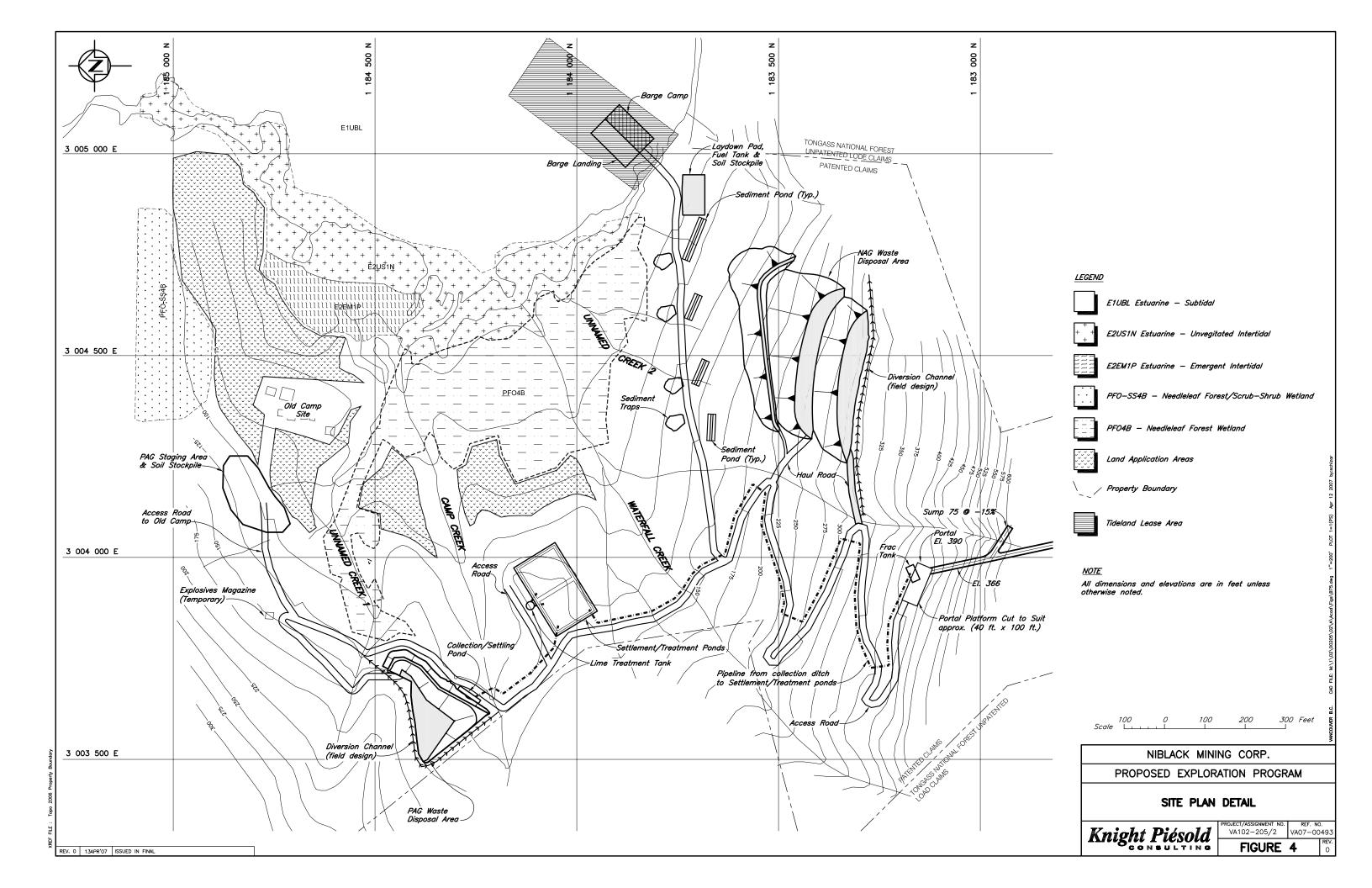
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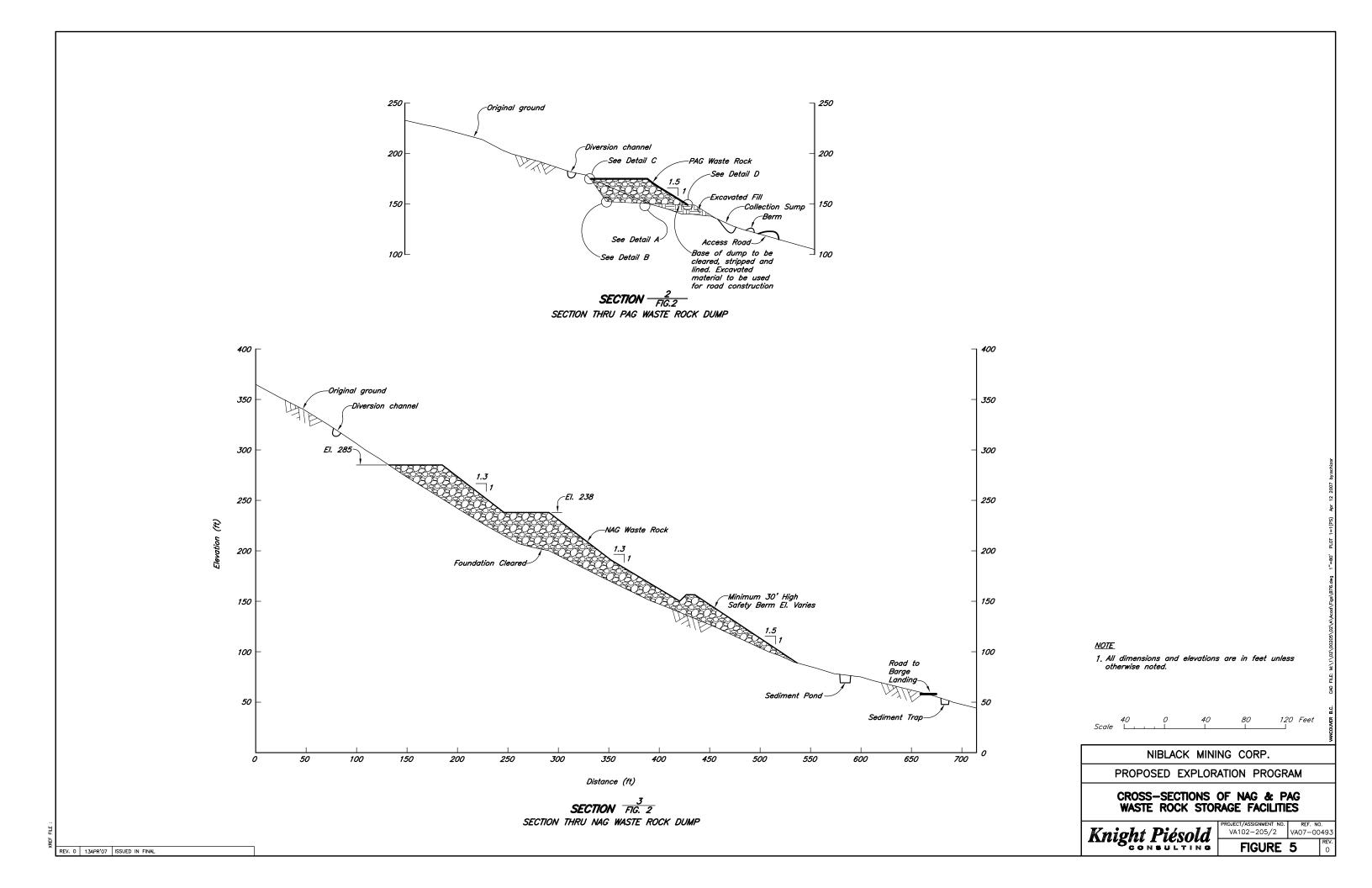
USFS Soil and Water Conservation Handbook (USFS, 1996).

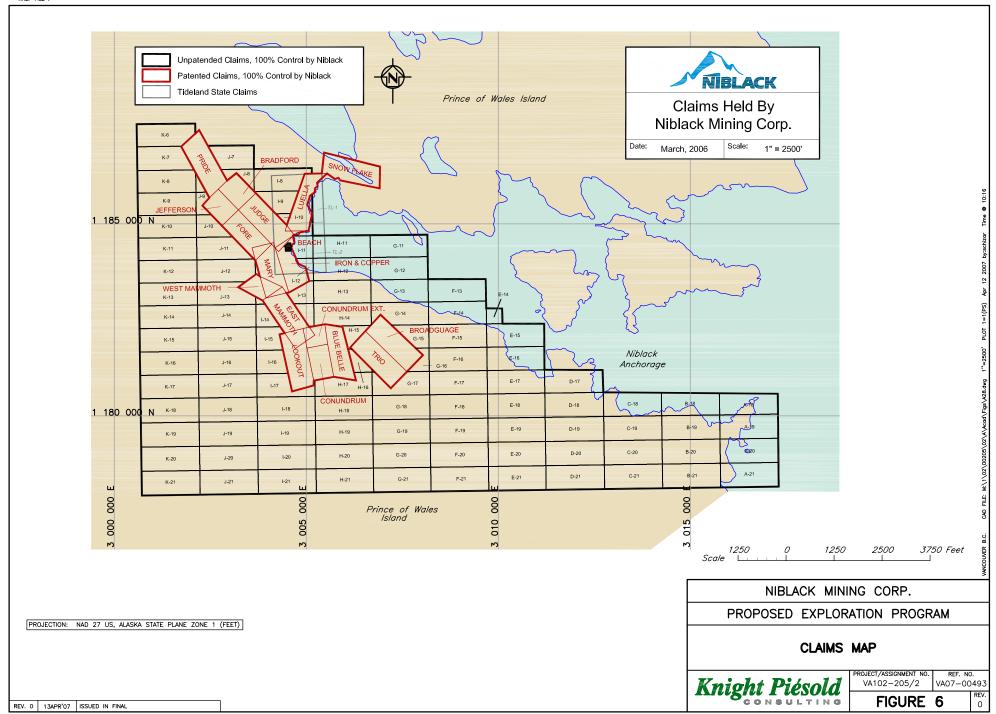










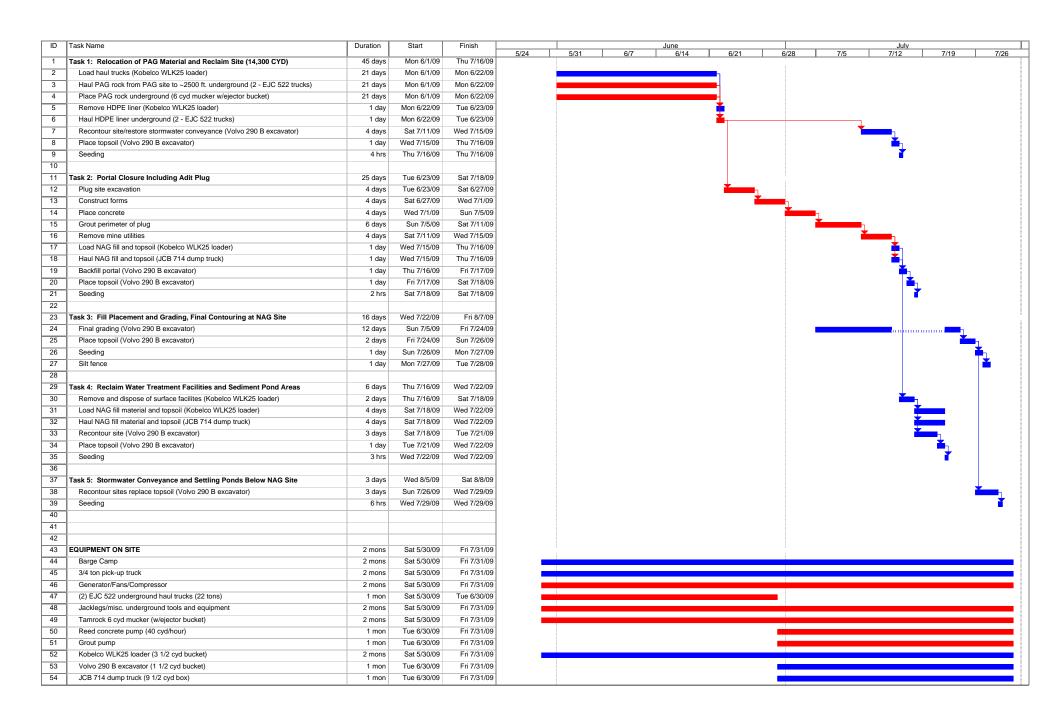


### **APPENDIX A**

# **Project Reclamation Schedule**

Tasks 1 to 5

#### NIBLACK EXPLORATION PROJECT RECLAMATION SCHEDULE



## **APPENDIX B**

**Project Reclamation Cost Estimate** 

#### NIBLACK PROJECT

#### **RECLAMATION COST ESTIMATES**

The following criteria and breakdown for reclamation/closure costs for the Niblack construction/ exploration project are provided for in the following major tasks. Table 1 at the end of Appendix B summarizes total estimated reclamation costs. Tables 2 through 6 provide equipment, fuel, labor, material, and mob/demob costs with an itemized breakdown for each reclamation task. Wage rates were calculated, assuming \$45.52 per hour (\$32.92 base rate + \$12.60 benefits), a 15% premium for working foreman's wages, and a 26% premium for overtime. These costs were compiled from contractor bids for work currently being done at Niblack and for current equipment rental estimates. They reflect actual site conditions, topography, and equipment and utilization factors that are representative of Southeast Alaska.

#### Task 1. Relocation of PAG Material and Reclaim Site

Criteria: About 14,300 yd<sup>3</sup> of potentially acid-generating material at the engineered temporary storage facility will be placed back underground at the southern-most segment of the adit (-4.7% decline). Material would be hauled from the PAG site to the southern end of the adit in underground haul trucks and end-dumped. An underground load-haul-dump (LHD) unit would pickup the PAG material, move it to the end of the adit, and pack it tight. The longest distance from the PAG site to the back of the adit is about 6000 feet. A 30 minute roundtrip is estimated, based on a haul truck traveling at 6 mph with loading/unloading taking a total of 10 minutes. Other activities include removal of the HDPE liner and disposal underground or recycle; re-contour, topsoil, and seed the PAG site; and clean and stabilize the storm water conveyance system.

### Task 2. Portal Closure Including Adit Plug

Criteria: The 14.5 ft. x 13. ft adit involving some 6,000 ft. of drift will be closed after the backfill is complete, using a concrete plug in the adit and pushed NAG material (about 250 cy) at the portal. The plug zone would be approximately 16 feet long and excavated two feet oversize (nominally 18.5 ft x 17 ft). Both ends of the plug would be formed, and concrete would be batched on-site, hauled underground with the LHD, and pumped between the forms. The oversized plug "zone" would be grouted to limit ground groundwater flow past the plug. The portal entrance/laydown area, which involves about 0.25 acres, would be cleared of all buildings and/or appurtenances and utilities. The area would then be topsoiled and hydroseeded and the stormwater conveyance material network would be stabilized for long-term stormwater management.

### Task 3. Fill Placement and Grading, Final Contouring at NAG Site

**Criteria:** The non-acid generating storage site (NAG) must remain stable at closure and in a final form that blends into the local topography. The site will contain about 46,600 cy of development rock. Prior to closure, NMC will evaluate the actual closure configuration, considering the final volume of rock deposited in the facility. Limited final grading is contemplated, given the bottom up construction approach. Any final grading may include a mid-slope bench to reduce the length of continuous slopes. Natural succession and some peripheral seeding will be the focus of the revegetation program, given the final slope angle. Graded rock will be covered with an average of 6 inches of topsoil.

### Task 4. Water Treatment Facility and Sediment Pond Reclamation

**Criteria:** At closure, the Water Treatment Facilities (WTF) ponds would be filled after the geosynthetic liners are cut, folded, and sealed in place. Fill material from the NAG pile would be used. The NAG pile is located 0.125 miles from the WTF, and the roundtrip is estimated to take 15 minutes based on a haul truck traveling at 6 mph and taking 10 minutes to load/unload. Drip emitter lines, piping conveyance and all other appurtenances and utilities would be removed from the area for reuse, and/or demolition and shipment offsite. The WTF and sediment pond areas would then be regraded and topsoil applied, followed by seeding.

### Task 5. Stormwater Management Area Reclamation

**Criteria:** Stormwater capture, conveyance, settling, and dispersion structures down gradient of the NAG site will be reclaimed following stabilization of the reclaimed NAG waste pile. On a conservative basis, this acreage is estimated at 0.5 acres. The activity would include placement of the originally excavated topsoil (stored beside the trenches and ponds) back in the trenches/ponds and grading. The work would be completed by backhoe. Protection from erosion and sedimentation is also a fundamental objective. Therefore, native species of grasses will be re-established.

### Task 6. Reclamation and Water Quality Monitoring

**Criteria:** Post closure monitoring will include annual reclamation/revegetation surveys for three years, and water quality monitoring extending out to 30 years. Post closure water quality monitoring will be performed once annually for years 1, 2, 5, 10, 20 and 30. For the first 2 years sampling will be performed at 6 sites (2 surface and 4 shallow ground water well). For years 5, 10, 20 and 30 the sampling will be performed at 3 sites (2 surface and 1 shallow ground water well) down-gradient of the NAG site and portal area (see Water Quality Baseline and Site Monitoring Plan).

Table 1. Summary of Total Estimated Reclamation Costs

Task Number	Reclamation task	Cost
Task 1	Relocation of PAG Material and Reclaim Site (14,300 CYD)	\$163,968
Task 2	Portal Closure Including Adit Plug	\$170,234
Task 3	Fill Placement and Grading, Final Contouring at NAG Site	\$24,202
Task 4	Reclaim WTF and Sediment Pond Areas	\$18,950
Task 5	Stormwater Management Area Reclamation	\$5,857
	Equipment Mob/Demob	\$46,400
	Personnel transport	\$12,240
	Equipment standby	\$34,114
-	Support equipment including barge camp	\$167,469
	Direct Costs Subtotal	\$643,436
	Contractor Overhead (10%)	\$64,344
	Contractor Profit (15%)	\$96,515
	Engineering Design (5%)	\$32,172
	Scope contingency (10%)	\$64,344
	Bid contingency (10%)	\$64,344
	Agency Oversight	\$8,650
·-	Contract Performance & Payment Bond (3%)	\$19,303
	Direct and Indirect Costs Subtotal	\$993,107
<u>-</u>	Inflation (3.2% per year for 5 years)	\$169,397
	TOTAL TASK 1 THROUGH TASK 5	\$1,162,505
Task 6	Reclamation and Water Quality Monitoring Surveys: Year 1	
	Reclamation/revegetation monitoring	\$3,842
	Water quality sampling Year 2	\$7,954
	Reclamation/revegetation monitoring	\$3,964
	Water quality sampling	\$8,208
	Year 3	ψ0,200
	Reclamation/revegetation monitoring Year 5	\$4,091
	Water quality sampling	\$6,690
	Year 10	<b>4</b>
	Water quality sampling	\$7,831
	Year 20	<b>4.0 7.0</b>
	Water quality sampling	\$10,730
	Year 30	<b>044 7</b> 00
	Water quality sampling	\$14,702
	TOTAL TASK 6 (including 3.2% inflation per year)	\$68,011
-	Bid contingency (10%)	\$6,801
	TOTAL TASK 6 (incl. inflation and bid contingency)	\$74,813
<del>-</del>	GRAND TOTAL	\$1,237,317

Table 2. Materials Costs (Task 2)

Task 2: Portal Closure Including Adit Plug

sk 2: Portal Closure Including Adit Plug				
	Quantity (units)	Units	Unit Rate (\$/unit)	Cost (\$)
Plug site excavation	(55)		(Ψ, ω)	(4)
and and an		lump		
bits and steel	1	sum rock	\$500	\$500
explosives	155	tons lump	\$4.00	\$620
ground support	1	sum lump	\$400	\$400
misc.	1	sum	\$1,000	\$1,000
TOTAL				\$2,520
Construct forms				
8 x 8 timbers	2.73	MBF	\$522	\$1,425
plywood (3/4" CDX)	24	sheets	\$25.85	\$620
2 x 6	500	lft	\$0.53	\$266
#5 rebar	320	lft lump	\$0.58	\$186
misc.	1	sum	\$2,000	\$2,000
TOTAL			_	\$4,497
Place concrete				
concrete delivered to site	240	cyd	\$261	\$62,609
TOTAL				\$62,609
Grout perimeter of plug				
portland cement (94 lb. sacks)	400	sacks lump	\$6.70	\$2,680
bits and steel	1	sum lump	\$500	\$500
misc.	1	sum	\$2,000	\$2,000
TOTAL				\$5,180
Seeding				
Seed	0.25	acre	\$869.57	\$217
TOTAL				\$217

Table 3. Materials, Transportation and Analytical Costs (Task 6)

Task 6: Reclamation and Water Quality Monitoring

	I	Materials/	Transportatio	n
	<b>Quantity</b> (units)	Units	Unit Rate (\$/unit)	Cost (\$)
Reclamation/revegetation monitoring				
		lump		
transportation	1	sum	\$1,020	\$1,020
TOTAL				\$1,020
Water quality monitoring - years 1 & 2 (6 sar	nnle sites)			
vator quality morntoning years 1 & 2 (6 sar	ripic dited)	lump		
sampling materials/misc.	1	sum	\$500	\$500
		lump	·	·
analysis	1	sum	\$2,904	\$2,904
		lump		
transportation	1	sum	\$1,020	\$1,020
TOTAL				\$4,424
Water quality monitoring - years 5, 10, 20 &	30 (3 sample	sites)		
		lump		
sampling materials/misc.	1	sum	\$250	\$250
		lump		
analysis	1	sum	\$1,452	\$1,452
tuo non outotion	4	lump	<b>#4.000</b>	£4.000
transportation	1	sum	\$1,020	\$1,020
TOTAL				\$2,722

Table 4. Equipment Costs

Equipment	Monthly	Hourly	Hourly
	Rental	Operating Cost	Fuel Use
		(less fuel)	(gal/hour)
Generator/Fans/Compressor (see below)	\$6,535.41	\$49.98	20.0
EJC 522 underground truck (22 tons)	\$15,000.00	\$20.00	8.0
Jacklegs, misc UG equipment	\$4,000.00	\$0.00	n/a
Toro 6 cyd mucker (w/ejector bucket)	\$20,000.00	\$35.00	10.0
Kobelco WLK25 loader (3 1/2 cyd bucket)	\$4,045.67	\$9.86	3.5
3/4 ton pickup truck	\$641.58	\$2.50	2.0
Volvo 290 B excavator (1 1/2 cyd bucket)	\$8,528.05	\$20.37	4.0
JCB 714 dump truck (9 1/2 cyd box)	\$5,153.93	\$10.81	2.5
Reed concrete pump (40 cyd/hr)	\$2,173.91	\$13.04	2.0
Grout pump	\$2,695.65	\$4.35	n/a
Barge Camp	\$13,043.48	\$52.17	2.0
Generator (500kW)	\$4,269.57	\$45.22	18.0
Compressor (185 cfm)	\$765.84	\$2.77	2.0
Fans _	\$1,500.00	\$2.00	n/a
Generator/Fans/Compressor (total, reports to top line item)	\$6,535.41	\$49.98	20.0

Table 5. Mob/Demob and Transportation Costs

Mob/Demob	Rate / trip	Number	Cost
		of Trips	
Transport underground equipment to Ketchikan	\$20,000	1	\$20,000
Equipment barge trips from Ketchikan to Niblack	\$4,400	6	\$26,400
Personnel transport	\$510	24	\$12,240

Table 6. Post Closure Labour Costs (Task 6)

	number	L	abor Cos	t	Trans	Material	Total
	of	time	rate	total	Cost	Cost	Cost
	staff	(hours)	(\$/hour)	(\$)	(\$)	(\$)	(\$)
Reclamation/revegetation monitoring							
Annual inspection (Helper)	1	8	\$50.00	\$400	\$0	\$0	\$400
Annual inspection (Technician)	1	24	\$90.00	\$2,160	\$1,020	\$0	\$3,180
TOTAL							\$3,180
Water quality monitoring (Sampling Years 1 & 2)							
Annual Sampling (Helper)	1	8	\$50.00	\$400	\$0	\$0	\$400
Annual Sampling (Technician)	1	24	\$90.00	\$2,160	\$1,020	\$3,404	\$6,584
TOTAL							\$6,584
Water quality monitoring (Sampling Years 5,10,20 & 30)							
Annual Sampling (Helper)	1	8	\$50.00	\$400	\$0	\$0	\$400
Annual Sampling (Technician)	1	24	\$90.00	\$2,160	\$1,020	\$1,702	\$4,882
TOTAL							\$4,882

Table 7. Reclamation Cost Estimate for Tasks 1 to 5.

	Equipment in Use	Equ	ipment Renta	al Cost	Equipment Operating Cost				Fuel C	ost			Labor Co	st	Material Total	Total	
		time	rate	total	time	rate	total	time	rate	price	total	time	rate	total	Cost	Cost	
		(days)	(\$/month)	(\$)	(hours)	(\$/hour)	(\$)	(hours)	(gal/hour)	(\$)	(\$)	(hours)	(\$/hour)	(\$)	(\$)	(\$)	
Task 1: Relocation of PAG Material and Reclaim Site (14,300 CYD)	Kobelco																14,300 cyd x 1.5 tons/cyd = 21,500 tons
	WLK25																
Load haul trucks	loader	21	\$4,045.67	\$2,832	252	\$9.86	\$2,485	252	3.5	3.04	\$2,681	252	\$60.22	\$15,176	\$0	\$23,174	2 trucks, 6000 ft haul, 2
Haul PAG rock from PAG site to ~2500 ft underground	(2) EJC 522 trucks 6 cyd mucker	42	\$15,000.00	\$21,000	504	\$20.00	\$10,080	504	8.0	3.04	\$12,257	504	\$60.22	\$30,352	\$0	\$73,690	trips/hour each, 22 tons/trip
Place PAG rock underground	w/ejector bucket Kobelco WLK25	21	\$20,000.00	\$14,000	252	\$35.00	\$8,820	252	10.0	3.04	\$7,661	252	\$60.22	\$15,176	\$0	\$45,657	
Remove HDPE liner	loader	1	\$4,045.67	\$135	12	\$9.86	\$118	12	3.5	3.04	\$128	24	\$60.22	\$1,445	\$0	\$1,826	1 operator, 1 laborer
Haul liner underground Recontour site/restore stormwater	(2) EJC 522 trucks Volvo 290 B	2	\$15,000.00	\$1,000	24	\$20.00	\$480	24	8.0	3.04	\$584	24	\$60.22	\$1,445	\$0	\$3,509	2 trucks, 1 day each
conveyance	excavator	4	\$8,528.05	\$1,137	48	\$20.37	\$978	48	4.0	3.04	\$584	48	\$60.22	\$2,891	\$0	\$5,589	
Place topsoil	Volvo 290 B excavator	1	\$8,528.05	\$8,528	12	\$20.37	\$244	12	4.0	3.04	\$48	12	\$60.22	\$723		\$9,543	
Seeding												4	\$60.22	\$241	\$739	\$980	seed cost = \$1000/acre, labor = 3 acres/day
TOTAL													·	·	·	\$163,968	•
Task 2: Portal Closure Including Adit Plug																	
Plug site excavation												192	\$60.22	\$11,563	\$2,520	\$14,082	
Construct forms												192	\$60.22	\$11,563	\$4,497	\$16,060	
	Reed concrete																
Place concrete	pump	4	\$2,173.91	\$290	24	\$13.04	\$313	24	2.0	3.04	\$146	192	\$60.22	\$11,563	\$62,609	\$74,920	
Grout perimeter of plug	Grout pump	6	\$2,695.65	\$539	36	\$4.35	\$157					288	\$60.22	\$17,344	\$5,180	\$23,220	
Remove utilities												192	\$60.22	\$11,563		\$11,563	
	Kobelco WLK25																
Load NAG fill and topsoil	loader JCB 714	1	\$4,045.67	\$4,046	12	\$9.86	\$118	12	3.5	3.04	\$42	12	\$60.22	\$723		\$4,929	450 cyd of NAG rock 1 truck, 122 ft haul, 6
Haul NAG fill and topsoil	dump truck	1	\$5,153.93	\$5,154	12	\$10.81	\$130	12	2.5	3.04	\$30	12	\$60.22	\$723		\$6,036	trips/hour, 9cyd/trip

Backfill portal	Volvo 290 B excavator	1	\$8,528.05	\$8,528	12	\$20.37	\$244	12	4.0	3.04	\$48	12	\$60.22	\$723		\$9,543	
Place topsoil	Volvo 290 B excavator	1	\$8,528.05	\$8,528	12	\$20.37	\$244	12	4.0	3.04	\$48	12	\$60.22	\$723		\$9,543	
Seeding												2	\$60.22	\$120	\$217	\$338	seed cost = \$1000/acre, labor = 3 acres/day
TOTAL																\$170,234	ŕ
Task 3: Fill Placement and Grading, Final Contouring at NAG Site																	
Final grading	Volvo 290 B excavator Volvo 290 B	12	\$8,528.05	\$3,411	144	\$20.37	\$2,933	144	4.0	3.04	\$1,751	144	\$60.22	\$8,672		\$16,767	
Place topsoil	excavator	2	\$8,528.05	\$569	24	\$20.37	\$489	24	4.0	3.04	\$292	24	\$60.22	\$1,445		\$2,794	000d 000t
Seeding												12	\$60.22	\$723	\$2,696	\$3,418	seed cost = \$1000/acre, labor = 3 acres/day
Silt fence												12	\$60.22	\$723	\$500	\$1,223	
TOTAL																\$24,202	
Task 4: Reclaim Water Treatment Fa Sediment Pond Areas																	
Remove and dispose of surface facilities	Kobelco WLK25 loader Kobelco	2	\$4,045.67	\$270	24	\$9.86	\$237	24	3.5	3.04	\$255	48	\$60.22	\$2,891		\$3,652	1 operator, 1 laborer
Load NAG fill material and topsoil	WLK25 loader JCB 714	4	\$4,045.67	\$539	48	\$9.86	\$473	48	3.5	3.04	\$511	48	\$60.22	\$2,891		\$4,414	3000 cyd NAG rock truck, 1000 ft haul, 8
Haul NAG fill material and topsoil	dump truck Volvo 290 B	4	\$5,153.93	\$687	48	\$10.81	\$519	48	2.5	3.04	\$365	48	\$60.22	\$2,891		\$4,462	
Recontour site	excavator Volvo 290 B	3	\$8,528.05	\$853	36	\$20.37	\$733	36	4.0	3.04	\$438	36	\$60.22	\$2,168		\$4,192	
Place topsoil	excavator	1	\$8,528.05	\$284	12	\$20.37	\$244	12	4.0	3.04	\$146	12	\$60.22	\$723		\$1,397	seed cost = \$1000/acre,
Seeding												3	\$60.22	\$181	\$652	\$833	labor = 3 acres/day
TOTAL																\$18,950	
Task 5: Stormwater Conveyance and Settling Ponds Below NAG Site	Volvo 290 B																
Recontour sites 7 replace topsoil	excavator	3	\$8,528.05	\$853	36	\$20.37	\$733	36	4.0	3.04	\$438	36	\$60.22	\$2,168		\$4,192	seed cost = \$1000/acre.
Seeding												6	\$60.22	\$361	\$1,304	\$1,666	labor = 3 acres/day
TOTAL																\$5,857	

Support Equipment											
Generator/Fans/Compressor (during Task 1 and Task 2)	43	\$6,535.41	\$9,367	516	\$49.98	\$25,791	516	20.0	3.04	\$31,373	\$66,531
Jacklegs/misc. UG equipment (during Task 1 and Task 2) Toro 6cyd mucker w/ejector plate	43	\$4,000.00	\$5,733								\$5,733
(during Task 2) 3/4 ton pick-up truck (during all	22	\$20,000.00	\$14,667	264	\$35.00	\$9,240	264	2.5	3.04	\$2,006	\$25,913
Tasks)	59	\$641.58	\$1,262								\$1,262
Barge camp	60	\$13,043.48	\$26,087	720	\$52.17	\$37,565	720	2.0	3.04	\$4,378	\$68,030
TOTAL											\$167,469
Equipment Standby											
Generator/Fans/Compressor (2) EJC 522 underground haul	17	\$6,535.41	\$3,703								\$3,703
trúcks (22 tons)	16	\$15,000.00	\$8,000								\$8,000
Jacklegs/misc. UG equipment	17	\$4,000.00	\$2,267								\$2,267
Toro 6cyd mucker w/ejector plate Kobelco WLK25 loader (3 1/2 cyd	17	\$20,000.00	\$11,333								\$11,333
bucket) Volvo 290 B excavator (1 1/2 cyd	31	\$4,045.67	\$4,181								\$4,181
bucket)	2	\$8,528.05	\$569								\$569
3/4 ton pick-up truck	1	\$641.58	\$21								\$21
Reed concrete pump	26	\$2,173.91	\$1,884								\$1,884
Grout pump	24	\$2,695.65	\$2,157								\$2,157
TOTAL			\$34,114								\$34,114