**UPDATE: TELKWA COAL LTD. PROPOSAL; TENAS PIT COAL MINE**

March 31st, 2019…………………………………………………….Glenda Ferris submission

RE: Allegiance Coal Ltd.: Tenas Coal Project; Definitive Feasibility Study results.

 Tenas Coal Project - Working Group meeting notes (BCEAO); January 17, 2019.

 Tenas Coal Project – Aquatics and Water Sub-Working Group meeting; January 30,

 2019

**SUMMARY \*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*Final\*\*\*\*\*\*\*\*\*\*\*\*\*\***

I have decided to write this now, since it appears that some form of iteration/refinement has already occurred within the Mine Plan/Waste Handling Plan, since the Project Description submission 2018 and the Open House….. or, that company is providing more information to certain discrete “groups”/sectors/government/s, than has NOT been made available to the “public”. Specifically, Waste Handling and Mine Site Components related to waste rock storage, as described within the “Project Description” submission to BCEAO, have now become more refined. There is also further clarification regarding water supply sources for Water Cover mitigation of PAG mine waste/s.

I have not been directly informed of “changes”/refinements, since we have not been provided with ‘draft’ “Baseline” Reports that are now being discussed openly during BCEAO Working Group and Sub-Committee meetings; I have **inferred** this information, as read, and so I may be “wrong”. My conclusions are due to descriptions within the above documents regarding “storage cells” for PAG/potentially acid generating waste versus the “old” segregation/”blending”/pit backfill plans and sources necessary for both Process Plant water supply and PAG waste rock and/or Process Plant waste that require “timely”, permanent water covers.

I would also like to say, at this point in time, that Acid Rock Drainage is an acknowledged hazard and ARD a risk….as is seen within eao-minutes summaries where some level of honest discussion is taking place. So, when local geologists tell anyone that there is no ARD “risk”, you can point them to the eao-minutes.

These PAG waste rock storage “cells”, with “assured” permanent water cover/s…….may only store Process Plant PAG waste/s…..it is hard to tell since both eao-minutes were written by someone non-technical; who seems to conflate all PAG mine waste. Process Plant PAG wastes and PAG waste rock excavated during coal mining are two different waste streams; the PAG waste rock tonnage far exceeds waste produced by Process Plant/Coal Washing Station.

We also have a more refined and specific production estimate, by type, of raw coal and of Strip Ratio/waste rock tonnages. NO information regarding competent and appropriate construction materials for plant site, mine dams or roads. The overburden of sand and gravels will not provide geotechnical integrity to any construction. Requirement of till/clays and large ballast rock must come from additional “quarry areas, and thus increase the mine footprint impact zone.

The “average” Strip Ratio remains 3.6:1, that is 3.6tonnes of waste rock to every tonne of raw coal mined….across a yearly variation due to coal deposit composition and that means **3.6million tonnes** of mine waste rock, on average annually.

* 750,000tonnes washed coal, annual average
* 1,050,000tonnes raw coal mined, annual average
* 3,600,000tonnes waste rock (may include waste coal tonnage)

\*Strip ratio, by open pit zone. phase or unit, is not “average” and ranged between 0 to 20:1.

\*AVERAGES are mathematical artifacts that only allow simple discussion and/or inaccurate calculations; averages do not represent reality; Full Range across each measured mine production is also required.

\*Sequence/timeline proposed for mine development seems to reflect **focus upon low waste** **rock interception at initial “phases”**, by phase/zone (page 11, Allegiance DFS); that means higher waste rock production during later phases, since our only knowledge is “averages” and the range of Strip Ratio is 1:1 up to 20:1.

\*Raw Coal tonnage versus washed coal tonnage production indicates an **estimate for Process** **Plant waste @ 300,000tonnes annually**, dependent upon coal quality extracted, not Strip Ratio.

Mine waste rock by category, unsupported by any ABA/NPR data or “representative sampling program that relates to the full range of sulphide sulphur within:

* Overburden: mostly sand and gravel; non-acid generating but with little to none NP/neutralization potential. \*There is no characterization except that it seems to be estimated by the company that **70% waste rock will be overburden.**
* Some “overburden” will be “soil”, that will be stockpiled for reclamation.
* “Tills” are also named as component of overburden; but not quantified. \*And, not identified during any Manalta inventory of geology at Telkwa.
* Waste Rock types between and adjacent to coal seams: PAG/potentially acid generating, onset period/s vary but green siltstone **ARD-onset 18 months** (field trial conducted by Manalta). \*Estimated to be **30% of total waste rock** (not supported by ABA data/lab results), throughout entire Tenas Pit mine life…but % by year will vary.
* Waste coal not accounted for, by tonnage, by %, or by any language.
* Process Plant waste streams: Coarse Rejects and Wash Plant tailings fines: PAG; estimates by raw coal tonnage versus clean coal production seem to indicate/by my calculation……….. **300,000tonnes** annual production but no breakdown by waste type, coarse rejects versus tailings fines.

However, the company has provided no “proofs”/data that their geochemical estimates either by volume or by waste rock type is representative of the full range within Tenas Pit. Stating that “humidity cell” work is on-going and folks will have to WAIT, does not answer requests for full **ABA test results** already completed, by waste rock type…..or, NPR completed calculations.

A NAG/non-acid generating waste rock dump still is mapped; but with NP/neutralization potential being the key geochemical factor NOT present in most waste rock, real question arise about whether this waste rock “pile”/dump is a blended dump….and not NAG unless NPR data is being manipulated.

There is also a level of misinformation regarding many geochemical aspects, here is one: Total Sulphur versus Sulphide Sulphur; these issues were addressed twenty years ago….almost all Sulphur within Telkwa geology is Sulphide Sulphur and almost all Sulphide Sulphur is Iron Sulphides; Pyrite. End of story.

So, the proposal for waste rock “cells”/storage/segregation seems to be that overburden waste rock (sand and gravel) will be used for cell-dam construction (\*and Water Storage Pond dams) with PAG waste rock deposited inside each cell.

 or,

eao-minutes are confusing Process Plant waste streams with mine waste rock….and “cells” will only be constructed for those waste streams, with water covers over PAG “wastes” to prevent ARD.

The proposal seems to imply that each cell will be able to maintain a permanent water cover, in the location of the “PAG cell” location, page just past 3.6/Figure 10 of Project Description that I assumed was a PAG waste rock dump. This named “PAG CELL” is placed in northern section of pit excavation and is more than 1.5km in length. If this PAG waste rock dump is placed, as proposed, within a zone identified as retaining groundwater table; the massive amounts of PAG waste rock will not “FIT” (major waste rock benches will be above the flooded pit water table) into that flooded elevation. A fluctuating water table, as has already been measured, will increase ARD oxidation and flushing/Wey-Dry cycles. In addition, this area is proposed to be mined as Phase 9, Year 10? Of mine development, so where will PAG waste rock be placed in the meantime? See “no hole; no backfill” principle ; Ferris.

The maps within DFS delineate “Phases” of coal extraction units, which could be interpreted as a timeline but these polygons do not match final waste rock configuration, as mapped in Project Description. \*This “Phase-approach” is the first indication of any mine development schedule.

This differs greatly from “blended” waste rock dumps proposal, or “backfill” proposal that will be flooded and/or PAG waste dump/waste pile proposal with “dry cover”, but there are no diagrams and no schedule that we can assess for this Waste Handling option. If we assume that diagram, **Figure 10: Project Description; past** **page 3:6**….represents footprint, then…………the PAG polygon/cell that is massive and undescribed as to tonnage/height or backfill flooding………is **now proposed to be a series of** **“cells”,** with a permanent water cover to prevent Sulphide-oxidation of 1) PAG waste rock…….or………2) Process Plant PAG waste streams.

Scenario may well be that during operational mine life, water covers may be maintained over PAG “cells” and Process Plant PAG wastes but that at Decommissioning and Closure of Tenas Pit (other pits may yet be mined) company proposal is to place a Dry Cover over PAG “cells”. So, no “in perpetuity” water cover maintenance, but Dry Cover effectiveness to prevent oxygen diffusion into PAG waste is questionable. Dry Covers composed of sand and gravel overburden will allow precipitation-infiltration and oxygen diffusion into waste rock “pile”.

WATER: The major requirement for prevention of ARD regarding PAG waste rock AND Process Plant solid waste streams is water. Sources of water supply can be separated into two supply streams: 1) Process Plant water supply requirements. 2) PAG waste (all) water covers requirements. Water volumes are also required for mine site construction/raising of all pond “dams”, if compacted tills are used.

Company states, eao-minutes, page 2 of Aquatics and Water, Process Plant water supply sources:

* “surface numerous ponds” locations unknown except for Water Storage Pond as mapped….foundation materials of surface ponds will not “leak”??; dams built of sand and gravel will not leak??
* “groundwater”…..?does this include open pit de-watering??, or drilled well?
* **“diversion from Creek Four** during high flows”
* **“pumping water from Goathorn Creek”** .all on page 2, “Geology and Mine Plan”.

Combine this with the strange comment that “overtopping” of Water Storage Pond will provide water cover/s for PAG waste cells….water supply shortfalls as contingency not named within the DFS, but **eao-minutes names water sources** (as above) that will be diverted for mine operations;…..and there is no Water Balance/Mass Balance data provided, as yet, for any mine site component.

Due to “lower-than-Manalta” tonnage production, there will be less water required than previous mine proposal, but………there is no accounting of the water volumes required for dust control nor any explanation of time-required-for-“settling” of TSS within Water Storage Pond that will supply “clean” water to Process Plant coal washing station.

Construction materials required for Water Storage dams and for PAG storage “cells” seem to be overburden waste rock, that is, sand and gravel. \*Mudstone waste rock/PAG/no NP….. is not a geotechnical-ly “safe” dam-construction-material, although this tonnage could be used within PAG “cells” to create less permeable “cell’-bottoms/upstream sides.

Foundations of all locations proposed for “ponds” and for “cells” remain within the known geology of permeable sand and gravel at surface. Will any “pond” or “cell” retain water if rates of exfiltration are significant?

In spite of Project Description submitted to BCEAO/BC Environmental Assessment Office, the Tenas Pit **full extraction length appears to be more than 3km** (not contiguous), **not the 1.5km** reported within the Project Description submission, 2018. A major pit unit (center) of high volume overburden/narrow coal seams will not be excavated at all, according to DFS Mine Plan, page 11. If this represents a “true” mine plan, this will greatly reduce total waste rock production from the original Manalta “plan” of fill utilization of coal reserves within the Tenas Pit. However, there is also no explanation of pit wall stability issues that are evident within this piecemeal approach to coal extraction….how will the company “manage” a waste rock face 100m high, adjacent to their operations, by Phase?

And, leaving a massive area within the Tenas Pit un-mined, the space for “backfill” within the open pit is also greatly reduced.

My opinion: This mine proposal is complicated and required extreme levels of QA/QC (Quality Accounting/Quality Control….care and attention. Every aspect, from geochemical characterization to geotechnical stability and WATER MANAGEMENT are critical. The waste handling plan ensures that oxidation of sulphides will proceed prior to Water Covers’ mitigation/s but Waste Handling Plan may be “do-able”…it is the water; the water supply; the water volumes removed from local creeks and from the Telkwa and Bulkley Rivers that is completely unacceptable. Removal of flow affects not only “dilution” of liquid mine effluent discharges, but affects temperature and even geomorphic processes. Still a bad mine plan and I oppose.

**ALLEGIANCE COAL LTD. TENAS COAL PROJECT DEFINITIVE FEASIBILITY STUDY RESULTS**

March 18, 2019 \*combined where need with eao-minutes quotes.

Page 1

* Strip ratio 3.6:1 BCM/ROM
* 1,050,000M raw coal extracted.
* 750,000 tonnes per annum of saleable coal.
* \*If we simply the 30% PAG waste rock and 70% NAG waste rock to 1/3:2/3rds, then with a total of 3.6M tonnes: PAG tonnage equals 1.81M tonnes; NAG equals 2.16M tonnes, as an average, but this will vary greatly, depending upon location/geology.

Page 2

* “Seaborne” coal does not account for internal, domestic use or inter-country/North American/South American exchange. \*Strange; SE BC coal production is never mentioned.
* Mark Gray is not an officer of the company, according to list.
* SRK is chief consulting firm assigned technical aspects of mine development.

Page 3,4

* Office of Wet’suwet’en is reported as primary First Nation consulted; not individual House Clans nor Elected Chief and Council/Moricetown. \*I do notice that both Mike Ridsdale and David deWit both attend meetings.
* “Map” of pit does show “PAG Cell”; only one that measures approximately 1.5km in length with an assumed large “backfill” zone plus above-ground dams/piles. There is no schedule/timeline for PAG waste rock disposal nor is there any explanation of capacity/tonnage-m3 of each “cell’ /cells within which to store total volumes of PAG waste rock. \*no longer named a waste rock pile/waste rock dump.
* Is a “cell”, as described within eao-minutes, a waste rock/unit that is constructed to maintain a permanent water cover? If cell dams are constructed from non-acid-generating waste (overburden sand and gravels) how can water cover be maintained?
* \*Minutes from Water sub-committee: “TCL Proposes to build **40 feet high dam** of till material from the ponds to the north of the potentially acid generating (PAG) cells that would **allow the water to be raised overtop**. (????) **The dam would hold high sulphur** **PAG.**

\*There are so many things wrong with this summary paragraph……….the language is ignorant……,the author does NOT understand what is being discussed.

* Is a “cell” the entire proposed PAG waste unit/polygon now mapped (page 4, DSR)? Or, are the eao-minutes accurate (page 2) that **“storage cells for storing the rock to** **prevent acid generation**….” Describes the “new” waste handling plan? NEW DAMS, by cell, constructed from sand and gravels, to store PAG waste rock as the mine excavation progresses?
* **Prevention** means prevention of oxidation through **timely/time-dependent submersion (prior to sulphide oxidation)** under water and the requirement of a permanent water cover, forever. \*If submersion occurs after Sulphide oxidation, dissolution of sulphides will immediately happen within water cover and ARD will overwhelm the “system”.
* I have now found that the word “CONTAINMENT” is being used for the simple storage/segregation of any waste rock: I helped write the BC ARD GUIDELINES….and “containment” (to me) means CONTAINMENT **of all drainage**, run-off and contact water from impacting receiving streams/watersheds. Words are important; if all drainage is directed into the Tenas Pit, post closure and the Tenas Pit discharges groundwater through fractures and sand/gravel lenses into flows the end within the Telkwa River basin, then high risks are being proposed to be permanently placed upon all values within that water course.

\*Also please note, First Nations are questioning “health” issues from contaminated fish tissue/diet……..but acidity and heavy metals will impact upon REPRODUCTIVE SUCCESS, not just of fish-food-organisms but of fish fry/fish populations.

\*Acidic flows into the Telkwa River bedload also represents a hazard of dissolving/entraining metals present in sediments, into a dissolved component of the water column where each metal (and metals’ toxic-synergisms) becomes bioavailable to organisms.

* **If we compare the diagrams, page 4 and page 11 of Allegiance DSR, the zones/phases do not match up, for excavation of a pit area for backfill, let alone construction of “cells”. Phase 9/partial and Phase 8/partial plus a zone of unknown timeline can be combined to create the proposed “cell”/or “cells”. That is a long time to wait to place PAG waste rock under a water cover…………years as timelines are not provided.**

\*Alternative scenario: the “cells” have been placed on-the-ground and are raised above all hope of pit water flooding; completely dependent upon surface water/precipitation and make-up water from Goathorn Creek.

* This area of the pit/NW section, at depth, has been shown to contain a groundwater table that fluctuates by season, with discharge towards the Telkwa River. Elevation of this groundwater flooding, post mining has not been described; current baseline water table elevation is barely described within the Project Description document.
* Eao-minutes: Aquatic and Water; page 2: “TCL proposes to build **40 feet high dam** of till material from the ponds to the north of the acid generating PAG cells **that will allow the water to be raised overtop.** \*now the words make little sense except to note that Water Storage facility dams will be 40 feet high/40-foot-high dams……..and that some form of “pond, as stated, will be excavated “out” of landscape to provide building materials for this dam. Stated material is “till”, not overburden (sand and gravels) but there are few areas where any competent tills have been identified. Require specific “till” characterization….plus estimated volume for this dam construction.
* \*\*\*Failure and collapse of 40-foot dams, with free water run-out, would devastate Telkwa-west side of river.
* To quote eao-minutes: **“Onset of acidity can take place fairly quickly”: this is a quote from the company….**we already know this from Manalta field trails; PAG green siltstone: 18 months to ARD onset…….company cannot expect to stockpile PAG waste rock for years and then backfill into “cells” that are flooded (or not).
* Within DSR there is no description or discussion about water supply…..that is, where are the water volumes **required for ARD-prevention water covers** coming from? Many sources are named: precipitation/snow-melt collection; pit de-watering, diversion ditch system (the system of ditches may not contain any consistent flows due to sand and gravel permeability and water loss) and a “well”?? \*production of flows from this drilled well not described…..**so, where is the required water by volume coming from**? The Process Plant also requires clean water, with water recycle included into Water Balance projections (that we have not seen). Is the make-up/clean water for almost all requirements coming from the rivers’ system?
* **ANSWER: eao-minutes; page 2: Aquatics and Water; “TCL PROPOSES TO HAVE THREE WATER SOURCES for processing the coal**…..?no mention of ARD water covers requirement???/no mention of operational dust control requirements??………water collected from surface numerous ponds, groundwater; and 3rd contingency from diversion of FOUR CREEK during high flows/ (and) pumping water from Goathorn Creek.” \*\*\*\*\*All diversion of flow/s will affect Telkwa River flows.
* We know that the location of Telkwa Coal Fields, due to rain-shadow and elevation, a flooded pond will lose water volume through time due to evaporation, let alone due to discharge through foundation materials and/or sand and gravel lenses within any pond or cell constructed of “waste rock”. So, a “pond” or a “Cell” cannot maintain water volumes through an “average” year, without make-up water being pumped in.

Page 5

* Draft AIR/Assessment Information Requirements is being written by the proponent! Yikes!
* Valued Component plus “effects” is being written by the proponent!
* “Company”/Allegiance CEO, Mark Gray; not a title at Telkwa Coal Ltd.
* Insistence that “permits” are being developed, when the “yes/no” of BCEAA must first be decided. Some comments in eao-minutes of concerns regarding this issue; clarification that Permits will be required to be formalized within 60days of final decision by Ministers for Approval Certificate.

Page 6

* All coal resources still being promoted as an “asset” within the Telkwa coal complex; coal “resources” are NOT proven coal reserves. And, all of the numbers seem to reflect high-sulphur, non-saleable thermal coal tonnage. Strange.

Page 8

* A new drawing, Figure 6.1, of known coal and drill locations. Note that Telkwa North is NORTH of the Telkwa River.

Page 9

* Estimation Methodology using Models, even for coal……….coal seams only with the “inter-burden” (see PAG waste rock) has been modelled by default. So, keep in mind that this is not real, empirical data. Models to assist with waste rock characterization…..?

Page 11

* First disclosure of a Mine Plan timeline, if accurate and by numeral sequence; drawing.
* 3rd bullet: “Waste rock dumps **outside the pit** as well as back-fill during mining within the pit.” So….is PAG waste rock in a “dump”? or….. in “Cells”?? And, we can all understand that if coal seam, faulted face, is 100meters depth, backfilling by shovel will have to create a base for mine excavation logistics.
* “Water management ponds to submerge under water potentially acid leaching waste rock **during mining.”**

\*Ignore all word changes to “leaching” instead of ARD, active acid generation…company is trying to lead you all down the path of “leaching” at neutral pH (unfortunately lead by SE-Coal presentation)……and, what about Post Closure water covers?? Does this mean Dry Cover at Closure, since company knows that ponds cannot maintain Water Covers in-perpetuity?

Page 12

* Good diagram; more backfill information….this backfill will never be within pit-water- flooded zone, so, what is the geochemistry of this backfill, by zone?
* Mine operates “24/7”.

Page 14/15

* “The plant location also allows for any future expansion of the pit as there are known coal resources (oxymoron) residing in the 2km between the selected plant location and Tenas Pit.” **But……….that is where company is proposing to place “overburden” as huge polygon…..and PAG “cell”/Cells, not to mention Water Storage pond.**
* Dust suppression system at the rail loadout and plant site not completed until 2022.

Page 17

* Water Management is discussed….not a real plan or any basic required information.
* Mine liquid effluent discharges BY PIPELINE to the Telkwa River….since surficial sand and gravels/by “ditch” would not work, leakage….this calls into question the function of any Diversion Ditch system built within sand and gravels around the mine site.
* \*\*Stupid statement that ARD-waste-rock would be placed “under water in management ponds constructed **during the first 10 years of** **production**”…..?? ”Eliminating the opportunity for the rock to acidize.” Is this really a word (maybe meant oxidize)???? **ARD-onset has been measured in months….not years, already in field trials by Manalta.**

\*The rest of DFS is not very important. G.

**EAO-MINUTES: WORKING GROUP; January 31, 2019 \*\*\*summary not by page #**

* Both sets of eao-minutes reveal that these agency/s and First Nations have been provided with much more detailed data and information than has ever been made available to the public. Our last information package was the Project Description document.
* Mention of “Baseline” report/s and also presentations of “plans” TCL/Telkwa Coal Ltd. has created an information gap between Working Group and local/regional residents.
* Draft AIR/Assessment Information Requirements by April/May 2019.
* Public Open House on dAIR mid-May or June.
* A Draft Information Requirement Table (tracking document?) for review; April.
* No trigger for CEAA/Canadian Environmental Assessment Act…no DFO/Department of Fisheries and Oceans attending, in spite of request by First Nations.
* ?Many errors in understanding?? “To prevent oxidation, PAG and NAG rock will be covered with water….”
* Mine liquid effluent discharges now mentioned (not proposed by company) to both Telkwa River and to the Bulkley River.
* Tenas Pit backfill “would be comprised of NAG and overburden”……when “NAG” waste rock is overburden…..and waste rock between coal layers has already been classified as PAG. Also…no one is asking any questions about WASTE COAL/High Sulphur Coal and final deposition of those tonnes.
* Bedrock and even pit “fractures” are being discounted….then statement that “they are very hard to detect.”
* **“Water from PAG cells and runoff will be directed to the water management pond….” Page 5.** Just the opposite as described in DFS. **“TCL will manage the storage ponds forever (PAG waste cells???) after reclamation with systems in place for monitoring changes to water levels and pond (dam) stability.” Page 4 ??really????**
* **“PAG cell design includes engineered mitigation plans to ensure there is no seepage if a “fault” (see fracture zone) is found.”** No mention of surficial sand and gravels permeability.
* A Water Balance calculation is implied, but not provided.
* Plans for ability to segregate PAG waste rock from NAG waste rock are not described; NPR standards for classification/characterization of waste rock are not provided.
* ABA test results; NPR data sets are not even requested, let alone provided.
* Cumulative Effects discussed but no recognition that Goathorn Open Pit is already proposed within Allegiance DFS…probable future projects are supposed to be included within CE assessment.
* Air quality/pit blasting once every day….noise…….all superficial discussion.
* No questions asked regarding construction materials, availability or location…impact footprint for mine construction.

**EAO-minutes; Aquatics and Water Sub-Committee: January 30, 2019**

* TCL provides an **overview of their Baseline Report**. \*Really a misnomer….company has obviously been describing the Mine Plan/Waste Handling Plans…not just baseline inventory.
* “Initial Potential Project Effects” for Valued Components, written by company/consultants.
* 40 foot high dam….for “pond”. Water Storage Pond? Water Management Pond? Terms used are confusing. Any 40 foot dam for massive “pond” is a geotechnical hazard….quite the same as a Tailings Impoundment Dam, as far as Modes of Failure and Consequences of Failure are concerned.
* \*Some discussion regarding Climate Change; dilution of mine liquid effluent. But…low flow conditions are not the only Climate Change issue: Storm events, frequency, intensity and duration must all be accounted within Water Balance and “pond” dams/geotechnical standards….even Mudstone waste rock “piles”.
* No discussion of CO2/Methane as relates to Climate issues.
* “The strategy for ARD management is to remove the oxygen and prevent oxidation by putting PAG rock underwater or **COVERING IT.” (my caps) ??dry cover proposal??**
* ARD onset discussed….requests for timelines to being “covered”.
* Discounting that any domestic water wells will be affected by mine operations.
* Water Balance for groundwater is in the works??
* Metals in fish tissue; metals in Telkwa River sediments/bedload.
* Information requested during meeting: depth of holding ponds; groundwater wells (piezometers??) depth relative to mine plan depth; height of overburden (and waste rock) piles/dumps.

So many questions NOT ASKED: geochemical assessment methodology; ABA test results by rock type, including waste coal; height of all dams; height and configuration of all waste rock “piles”; tonnage/volume requirement for backfill-base for mining operations shovel/trucks versus avoidance of waste rock production…..I could go on. I am sure many of you also have questions for the Open House that is scheduled.

This summary will be important to review prior to any Open House in May/June….

 \*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*Glenda Ferris