

# **SCHEDULE B**

## **WESTERN CANADIAN COAL CORP.'S COMMITMENTS FOR THE WOLVERINE COAL PROJECT**

## Summary of Western Canadian Coal Corp.'s Commitments

# ID		Type	Details	Reference	Agency	Compliance Mechanism
1.	Construction Management	CT	Construction Environmental Management Plan WCC will work with the General Plant Contractor as designs are advanced to finalize a Construction Environmental Management Plan (EMP) satisfactory to agencies. The Construction EMP will incorporate detailed requirements and schedules for construction phase environmental protection. It will integrate the approaches and commitments contained in the Additional Information Report, as well as more detailed measures developed for the Mine & Reclamation Permit Application, and in subsequent applications for Waste Management Permits, approvals under the Water Act, and other permits and approvals. The draft Construction Environmental Management Plan will be available for review in conjunction with the Construction Phase Effluent Permit Application - Technical Assessment Report. The plan will be revised as permits are granted and further conditions specified.	Additional Information Report 3.11.2, ITT	MEM MWLAP LWBC	Mines Act and EMA, permits and Water License.
2.		MN	Stability Monitoring Programs The coarse coal reject dump and tailings impoundment will be monitored for foundation failure caused by liquefaction and failure due to elevated water table or an upstream failure of diversion works. OMS Manuals will be provided in the Mine Permit application and will include peizometric and inclinometer monitoring, construction control, and a QA/QC program. (refer to #8)	Additional Information Report 10.2-4	MEM	Mines Act permit
3.	Waste	CT	Solid Waste Management Plan (WMP).	Additional	WLAP	EMA permit

	Management		WCC is committed to taking all necessary steps to ensure that the collection, storage, transportation and disposal of all wastes generated by project construction will be conducted in a safe, efficient, and environmentally compliant manner. WCC will provide an updated Solid Waste Management Plan (WMP) at permitting.	Information Report 3.13		
4.		CT	Mine Waste Management Plan WCC is committed to developing a mine Waste Management Plan to meet the following objectives: Provide for the long-term geotechnical stability of the waste facilities; Reduce the risk of ARD seepage emanating from each facility during operations and throughout post-closure; Minimize the potential for impacts from metal release, and in particular, selenium from the facilities during operations and throughout post-closure; Provide for additional monitoring, including operational monitoring, to allow appropriate handling of the wastes to reduce uncertainties and to reduce risks of non-performance of the facilities; Provide contingencies for final disposal of any materials where there is a residual risk of non-performance.	Additional Information Report 3.7	MEM WLAP LWBC	Mines Act, and EMA permits
5.		MN	Risk Management, Monitoring & Contingency Plans Table 10.2-4 of the Additional Information Report provides a summary of monitoring and contingency plans in tabular format. Major Failure Modes Assessment and Risk Management Based on Information Design as of April 2004. WCC is committed to implementation of mitigation, monitoring and contingency programs as outlined in that table.	Additional Information Report 10.2	MEM WLAP LWBC	Mines Act, and EMA permits Water Act
6.		PT	Hydrocarbon Handling and Disposal (a subset	ITT –	MWLAP	EMA permit

			of the Waste Management Plan) The oil/grease section of the oil water separator(s) will be cleaned by a suction truck. This task will be subcontracted to a qualified company with the capability to handle, dispose and recycle such material.	Agencies		
7.		PT	Liquid Effluent Management Plan - Sewage Treatment - Prior to construction camp construction, detailed design of the camp sewage lagoon and treated effluent spray system and disposal area will be provided in accordance with industry practice and regulatory guidelines. WCC commits to effectively managing sewage from construction and operational systems such that 1) surface discharge to receiving waters or surface channelling is avoided, 2) WQO for related contaminants (TSS, BOD, Bacteria) are met, and 3) phosphorus loading to receiving streams is minimised	ITT – Agencies	MWLAP	EMA permit for construction
8.		MG/CT /PT	Stability Monitoring Programs Coarse Coal Reject Pile liquefaction: To avoid the issue of potential liquefaction of the loose silty sand layer immediately beneath the gravel in the floodplain, the toe of the CCR Pile is being moved farther westward – to a position that will avoid loading of the floodplain sediments. This work is being done presently as part of the more detailed permit level design, which has benefited from additional site investigation work. A slope monitoring program is also being written into the dump OMS manual to further reduce this risk. East Dump: A slope monitoring program is being written into the dump OMS manual to further reduce the risk of slope failure. North Dump: Details of the lift construction and	ITT – Agencies	MEM	Mines Act permit

			re-sloping sequence that is planned to maximize dump stability will be provided as part of the permit level design. The current dumping schedule and mine operations plan are integrated such that no personnel will be working in the pit area below the North Dump while dumping is occurring along the southern slopes where potential run-outs could impact the pit. A slope monitoring program is being written into the dump OMS manual to further reduce risk of slope failure. (refer to #2)			
9.		CT/PT	Monitoring Programs – ARD/ML Material placed in the waste dumps will be sampled to demonstrate the spatial distribution of PAG and NAG material in the dump and evaluate the effectiveness of the blending management plan. The details of additional drainage sampling will be evaluated during permitting.	ITT – Agencies	MEM	Mines Act permit
10.		CT	Water Quality and Aquatic Effects Management Plan WCC commits to diligent phosphorus management, and will eliminate/minimize P use wherever possible. WCC commits to effectively manage phosphorus by restricting phosphorus use at truck wash sites, application of appropriate reclamation fertilizers, etc and to effectively manage phosphorus in sewage, gray water, etc so as to minimize its discharge to receiving waters.	ITT – Agencies	MWLAP	EMA permit
11.	Acid Rock Drainage and Metal Leaching	CT	ML/ARD Management Plan WCC is committed (through its Mine Waste Management Plan) to reducing the risk of ARD seepage emanating from each facility during operations and throughout post-closure, and minimizing the potential for impacts from metal	Additional Information Report 3.7	MEM/ MWLAP	Mines Act and Environmental Management Act permits

			release, and in particular, selenium from the facilities during operations and throughout post-closure. Assumptions related to ARD/ML will be refined as the Project evolves, based on additional static and kinetic test data. Additional detail and refinement of the mine waste management plans will be provided as the project moves forward.			
12.		MN	ML/ARD Management Plan Monitoring Programs – ARD/ML- Operational monitoring will be conducted as an input to managing plan refinements for CCR and tailings and to confirm the characteristics of waste rock. Monitoring of facilities will continue into closure to evaluate longer term water quality trends. A summary of proposed monitoring programs is presented in Table 10.9-1 of the Additional Information Report	Additional Information Report 10.9.1	MEM/WLAP	Mines Act and EMA permits
13.		MN/MG	Monitoring -ARD/ML WCC will design mitigations and monitoring controls to reduce ARD/ML from coarse coal reject (CCR) into potential waterfowl habitat by: Placing coarse material at toe of CCR Dump; monitoring water quality in seepage collection ditch as first indicator of acid generation, and groundwater monitoring downstream of CCR facility to determine need for contingency measures.	Additional Information Report 10.2	As above	Mines Act and EMA permits
14.		MN/MG	Mine Waste Management Plan & Monitoring – ARD/ML WCC will design mitigations and monitoring controls to reduce input of ARD/ML into Wolverine River and Perry Creek from dumps, coarse coal reject, and tailings ponds by: Controlled disposal of potentially acid generating wastes; Monitoring of settling pond discharge, tailings seepage, and groundwater; Monitoring of ARD characteristics of waste rock	Additional Information Report 10.2	As above	Mines Act and EMA permits

			and raw coal plant feed; Monitoring of water quality in Wolverine River and Perry Creek			
15.		PT	Monitoring – Water Quality WCC recognizes that project contaminant modeling was based on dissolved metal fractions, but commits to meet total metal WQO as per Appendix M of the Additional Information Report. WCC believes that the inclusion of a number of conservative variables will provide adequate assurance that objectives will be met. (see commitment #45)	ITT – Agencies	MWLAP	EMA effluent permit
16.		MN/PT	ML/ARD Management Plan Multi-element scans are being conducted bi-monthly on waste rock humidity cells and additional humidity cells have been commissioned on both tailings and CCR materials as well as additional waste rock material. Multi-element scans will be conducted on leachate from these tests. Data from kinetic test programs will be provided during permitting and into construction.	ITT – Agencies	MEM	Mines Act Permit and EMA effluent permit for operation
17.		MG/ MN/CT	Risk Management, Mitigation and Contingency Plan Commitments to mitigation, monitoring, and contingency measures to reduce risk and potential effects of mine facility failures are detailed in Table 10.2-4 of the Additional Information Report	Additional Information Report 10.2	Listed agencies in Table 10.2-4	Listed permits in Table
18.		PT	EB Pit ARD management: Waste sequencing and detailed dump design, ARD mitigation and management plans will be re-evaluated and refined at permitting.	ITT – Agencies	MEM	Mines Act permit for EB pit
19.		PT	ML/ARD Management Plan Further information on ARD/ML assessment and management to be provided at permitting: <ul style="list-style-type: none"> <li>Humidity cell test work on Wolverine conglomerate and lower portion of FSs-E2</li> </ul>	ITT – Agencies	MEM	Mines Act permit

			<p>unit and site specific HPR criteria</p> <ul style="list-style-type: none"> <li>• Opportunity to place units that contain sandstone and/or siltstone in the base of the North and West dumps (to minimize Se leaching)</li> <li>• Methods to achieve quick turnaround on analytical work required for making waste management handling decision.</li> <li>• Maintenance of waste dump construction records including rock type inventory</li> <li>• Operational monitoring of ARD characteristics</li> <li>• Humidity cell testing and operational monitoring of tailings and CCR ARD/ML characteristics</li> <li>• Testing of G-seam and B-seam ARD/ML characteristics</li> <li>• Detailed procedures manual for CCR waste assessment and handling (to be part of the EMS for the Perry Pit Creek)</li> <li>• Tailings monitoring program</li> <li>• Operational monitoring of dryer ash</li> </ul> <p>Refinement of drainage water quality predictions during operations (for closure planning)</p>			
20.		MN/CT	<p>ML/ARD Monitoring – Operations</p> <p>In the Mine Permit Application, WCC will provide additional information on sampling protocols for blast hole cuttings and analyses related to materials handling at operational levels, i.e., to allow timely results of sample analyses related to materials handling.</p>	ITT – Agencies	MEM	Mines Act permit
21.		PT	<p>Mine Waste Management Program - Stability of Major Structures</p> <p>Further information concerning geotechnical characteristics and stability of major mine structures to be provided at permitting:</p>	ITT – Agencies	MEM	Mines Act permit

			<ul style="list-style-type: none"> <li>• Results of more site investigation, foundation information and final design studies for proposed major structures</li> <li>• Mitigation, contingency, monitoring and instrumentation plans for potential failure modes</li> <li>• Results of further studies (varved clays and silts, soil strength profile, pore pressure profile, clay silt consolidation characteristics and foundation settlement, muskegs), and management plans (design for differential settlement, muskeg removal) to address tailings dam foundation.</li> <li>• Assessment of potential effects on tailings dam foundation of ground vibrations caused by loaded coal trains on adjacent rail line.</li> <li>• Confirmation of tailings dam stability safety factors during construction and over the long term</li> <li>• Detailed dam design with stage cross section design drawings</li> <li>• Quality control and quality assurance specifications for dam construction and associated surface water and seepage water management structures</li> <li>• Inspection and maintenance program for water diversion works</li> <li>• Field monitoring instrumentation program and an Operation, Maintenance and Surveillance Manual</li> <li>• Emergency Preparedness Plan</li> <li>• Closure design concept</li> <li>• Confirmation of integrity of water diversion structures located above the dump</li> <li>• Detailed design for CCR pile</li> <li>• Field monitoring instrumentation program for</li> </ul>			
--	--	--	--	--	--	--

			<p>the CCR pile</p> <ul style="list-style-type: none"> <li>• Inspection and maintenance program for the water diversion works</li> <li>• Construction procedures, including quality control and quality assurance requirements for CCR pile</li> <li>• Potential for combustion of carbonaceous material to be stored in the CR pile and possible effects on dump performance</li> <li>• Closure design concept for the CCR pile</li> <li>• Management plans to address downslope risks associated with potential dump failure (appropriate to level G risk).</li> <li>• Dump construction and stability monitoring procedures for all waste dumps</li> <li>• Procedure for worker safety in the pit below the active North Dump</li> <li>• Highwall dewatering requirements for the area below the North Dump</li> <li>• Implementation plan for zone of “no access” below the East Dump toe</li> <li>• Closure design concepts for Perry Creek Waste Rock dumps</li> <li>• Perry Creek pit wall design during operating stages of pit development</li> <li>• Monitoring and inspection program for pit wall stability. (refer to #2 &amp; 8)</li> </ul>			
22.		PT	<p>Stability Monitoring Program continued from above</p> <p>Additional foundations investigation and stability evaluations for EB Pit and waste dump</p> <ul style="list-style-type: none"> <li>• Management plans to address downslope risks associated with potential dump failure</li> <li>• Additional site investigation, design studies and stability analyses for EB Waste Rock Dumps</li> </ul>	ITT – Agencies	MEM	Mines Act permit for EB Pit

			<ul style="list-style-type: none"> <li>• Final designs for the EB Pit Waste rock Dumps</li> <li>• Pre-mine drainage ditching plans for EB Pit Waste Rock Dumps</li> <li>• Construction and stability monitoring procedures for the EB Pit Waste rock dumps</li> <li>• Closure design concepts for the EB Pit Waste rock dumps</li> <li>• EB pit wall design during operating stages of pit development</li> </ul> <p>Monitoring and inspection program for pit wall stability. (See commitments #2&amp;9)</p>			
23.		PT	<p>Debris Flow Hazard Assessment</p> <p>The debris flow hazard assessment has been completed, and results of fall 2004 field studies and assessment and mitigation of geomorphic hazards within the W14, W18 and W22 watersheds will be provided in conjunction with permitting</p>	ITT – Agencies MEM-LWBC	MEM LWBC	Mines permit Water License
24.	Erosion Control	PT	<p>Sediment Control Plan –Prevention</p> <p>Effective erosion control strategies will be implemented in combination with the settling ponds, to achieve the best possible settling pond effluent quality. (refer to #35)</p>	Additional Information Report 10.5.4	MEM/M WLAP	Mines Act permit/ EMA-effluent permits for construction and operation
25.		PT	<p>Sediment Control Plan - Flocculants</p> <p>WCC will provide a contingency flocculent system on the major settling pond. Dilution of flows for SP18 and SP14 in W14 for purposes of meeting permit objectives will be discussed at permitting.</p>	ITT – Agencies	MWLAP	EMA - effluent permits for construction and operation
26.		CT	<p>Sediment Control Plan- Flocculants</p> <p>Rainbow trout toxicity testing is being conducted to support the use of the selected flocculants. Tests are being performed on synthesized pond decant and on the raw chemicals. WCC</p>	ITT – Agencies	MWLAP	EMA effluent permits for construction and operation

			commits that sediment flocculants will be non-acutely toxic to RbT. This information will be included with the EMA Permit Application.			
27.		CT/PT	Sediment Control Plan- Flocculants Flocculent test, both success and toxicity are in progress and a memorandum on this will be provided in the Construction Effluent Permit application – Technical Assessment Report. The Technical Assessment Report, meeting MWLAP's information requirements will be submitted a minimum of 6 weeks prior to EMA permit issuance.	ITT – Agencies	MWLAP	EMA Effluent permit for construction
28.		MN	Sediment Control Plan- Prevention Source control Best Management Practices will be implemented to control erosion at the source to the maximum extent practical. Source controls may include; diversions, silt fences, check dams, brush barriers, detention swales, blade trenches, vegetation, encapsulation, avoidance, incremental stripping, or flocculants	Additional Information Report 10.5.4.2 and 10.5.4.3	MEM/WLAP	
29.		MG/CT / PT	Sediment Control Plan- Prevention WCC is committed to employing erosion prevention and sediment control (EP&SC) measures as required to provide for water quality protection during construction activity. WCC is using a mulching machine at the Dillon Mine, and, if program evaluation is favourable, WCC will add this to our proposed range of methods for use in erosion prevention and sediment control, to be outlined in the Construction Effluent Approval Technical Assessment Report. The use of a mulching machine is expected to contribute to stabilizing potentially erodible surfaces. EP & SC measures will be outlined for approval as part of the Technical Assessment report for the Construction Effluent Permit.	ITT – Agencies	MWLAP	EMA effluent permit for construction

30.		MG/PT	Sediment Control Plan- Prevention A higher priority will be placed on managing sediment sources in the pit and north/south dump areas (high erosion potential) than in the East Dump area. The Construction Effluent Approval Technical Assessment Report will reflect these differences.	ITT – Agencies	MWLAP	EMA effluent permit for construction
31.		CT/PT	Borrow Sources Some borrow will be taken from within the future CCR Dump area. Available information on the materials balance for site grading and dam construction, and material sources, will be provided at permitting.	ITT – Agencies	MEM	Mines Act Permit
32.		CT/PT	Sediment Control Plan WCC commits to conducting sediment control planning for the Perry Creek Road Realignment. Details to be provided during construction as an amendment to the Mine Permit Application prior to construction of the road	ITT – Agencies EPD Item 69	MEM MWLAP	Mines Act permit EMA effluent permit for construction
33.		CT/PT	Sediment Control Plan Settling ponds and runoff collection systems will be in place as needed and operational prior to major surface disturbance in the Plantsite and mine areas, including the Wolverine FSR realignment. The construction plan will identify erosion control as a priority, and an erosion prevention and sediment control plan will be submitted as part of the Water Management Plan and the Technical Assessment Report for the Construction Effluent Permit.	ITT – Agencies	MWLAP	Mines Act permit EMA effluent permit for construction
34.		CT	Sediment Control Plan – Water Quality Objectives - Construction Construction limits acceptable to WLAP for both sediment pond and diversion discharges will be negotiated at permitting. (see #24)	ITT – Agencies	MWLAP	EMA effluent permit for construction
35.		CT	Sediment Control Plan – Water Quality Objectives - Operation	ITT – Agencies	MWLAP	EMA effluent permit for construction

			WCC commits that sediment pond discharges will meet a level of 50 mg/L (unless otherwise agreed by the Director, EPD) during operation. (see #40)	EPD Item 100		
36.	Water Management Plan	CT	Sediment Control/Water Management Plan Water management at the site will involve the diversion of clean catchments around or through areas that are disturbed by mining, and collection of runoff from disturbed areas for treatment in settling ponds prior to discharge. A total of seven settling ponds will service the Perry Creek area, with six in operation at any given time: two ponds will service the EB area. With the exception of the SP4a and SP4b ponds, all ponds will operate for the life of the mine, and are designed as life of mine facilities.	Additional Information Report 3.8	MWLAP LWBC	EMA effluent permit for operation? Water license?
37.		PT	Water Management Plan - Recycling WCC will consider and implement to the maximum extent practical water recycling opportunities (tailings and SP12 seepage for process make-up water, use of pit inflows and SP12 water for dust control) at permitting Updates to the mass water balance, incorporating impacts of recycling, will be provided in conjunction with the Effluent Permit Applications.	ITT – Agencies Action Item 7	MWLAP LWBC	EMA effluent permit for operation? Water license?
38.		CT	WCC commits, to the maximum extent practical and as required to meet receiving water objectives, to manage mine site water in order to minimize effluent discharge to receiving environment. Maximize to the extent practical and cost-effective, plant site recycling and water balancing between tailings and sediment ponds, use of ponded water for site dust control, and use of tailings pond trench and interception well waters. Minimize the use of fresh ground water in these processes. WCC also commits to	ITT – Agencies	MEM MWLAP LWBC	Mines Act permit EMA effluent permit for construction and operation

			promoting discharge to ground in order to reduce concerns with the discharge of TSS.			
39.		PT	<p>Water Management - Diversions</p> <p>Designs are being developed to divert clean water around the mine site areas, and to minimize erosion along the diversions channels. Designs for the initial diversions will be included in the Mine Permit and/or Water Licence Application submissions, as required. Implementation plans include channel seasoning, vegetation, some armoring and slope protection, check dams, etc. Erosion will occur in the initial commissioning period, but will be minimized to the extent practical. Initial performance will be monitored, and areas that are determined to present a chronic risk will be remedied.</p>	ITT – Agencies	MEM MWLAP LWBC	Mines Act Permit EMA effluent permit for construction and operation
40.		CT	<p>Water Management - Diversions</p> <p>WCC commits at both Perry and EB mine sites to: 1) divert clean water to the maximum extent practical; 2) treat diverted “clean water” as necessary using “channel seasoning”, stilling basins, ponds, swales, etc to meet approved discharge criteria and water quality objectives. Diversion ditches are to be designed as necessary to meet discharge limits (e.g. vegetated, armoured, and with dissipation cells). Final discharge quality limits will be negotiated with WLAP at effluent permitting. Diversion ditches will not be expected to meet final discharge limits during the initial channel seasoning period but will meet objectives agreed to for local receiving streams. After initial channel seasoning, the discharge target will be 50 mg/L total suspended solids, unless background concentrations upstream of the diversion point exceed 50 mg/L total suspended</p>	ITT – Agencies	MEM MWLAP LWBC	Mines Act Permit EMA effluent permit for construction and operation

			solids. If upstream background levels exceed 50 mg/l, objectives will set in relation to background levels (unless otherwise agreed to by the Director, EPD).			
41.		PT	Water Management–Sediment Ponds Details of the SP 12 decant management plan to meet WQO will be presented at permitting. SP12 will decant to a channel that routes through a nominal 1 ha temporal wetland in a remnant oxbow. A low gabion weir may also be constructed across the outlet from this area, to impound a low head during significant storm events. This would be removed if selenium becomes an issue, but the site would be well seasoned and sediment control would be well established by this time.	ITT – Agencies	MWLAP LWBC?	EMA effluent permit for construction and operation
42.		PT	Water Management – Effluent Discharge During construction and during operations if selenium is not an issue, discharge from SP 6 & 4 will use swales and oxbows for polishing to meet WQO. Discharge from these structures will also route through a temporally wet oxbow area located immediately east of the CN Rail embankment. Details of routing will be finalized at permitting.	ITT – Agencies	MWLAP	EMA effluent permit for construction and operation
43.		PT	Monitoring Programs – Wetlands Near the Minesite A baseline program for Oxbow-3 and other potentially impacted wetland areas has been developed in conjunction with EPD. Sediment and benthos/periphyton sampling was conducted in 2004. Location of WQO sites will be defined at permitting.	ITT – Agencies EPD Item 17	MWLAP	EMA effluent permit for construction and operation
44.		CT	Monitoring – Floodplain Fish Habitat Given the EPD request to route discharge flows through the oxbows in the Wolverine floodplain, WCC commits, at permitting, to enhance fish	ITT – Agencies	MWLAP	EMA effluent permit for operation

			habitat information on fish utilization of oxbows/ tributaries that are being considered as vectors for site effluents (e.g. the oxbow lake that accepts W14 flow). Information will be used to ensure that detailed routing of effluents is based on suitability of initial receiving environment waters (tributaries) for expected effluent loading.			
45.		PT	<p>Monitoring – Water Quality Objectives</p> <p>The intent of the design will be to meet the receiving water quality objectives. It is expected that some leeway would be granted during the initial commissioning period, and that any discharge criteria that are applied would reflect background quality, not effluent quality from treatment systems.</p> <p>WCC commits that water quality objectives (based on the total fraction in the case of metals) will be met in receiving waters at the points of complete mixing or as negotiated with EPD (perhaps at partial mixing, depending on length of mixing zone, the contaminant in question and the value of the local aquatic habitat). (refer to #15)</p>	ITT – Agencies	MWLAP	EMA effluent permit for construction
46.		PT	<p>Monitoring – Water Quality Objectives</p> <p>WCC is committed to defining revised water quality objectives for TSS, turbidity, chlorophyll, nitrate and ammonia in conjunction with permitting.</p> <p>The proposed water quality objectives in Appendix M of the Additional Information Report are appropriate, except for TSS (set too high and should be based on induced), turbidity (lacking), chlorophyll (lacking), nitrate (lacking, but should be 40 mg/L). The chronic and acute ammonia objectives will be set on a time specific temperature and pH basis. The freshet objectives for several metals, including iron,</p>	ITT – Agencies	MWLAP	EMA effluent permit for construction and operation

			cadmium and chromium require refinement. WCC commits to finalize freshet objectives for these metals during permitting. If monitoring indicates that sulphate concentrations (in Perry Creek) are approaching the 100 mg/L water quality guideline, site specific testing will be conducted. Such testing will involve spiking the receiving waters with sulphate to determine the sulphate concentration range where no observable chronic effects occur. In addition, careful examination of Perry Creek will determine the presence of absence of sensitive species."			
47.		CT	Monitoring – Water Quality Objectives With the agreement to provide further information concerning the aquatic life utilization of lower W14, and with the proposal to dilute SP18 and SP 14 into W14, WCC recognizes that some WQO may be required for that stream. WCC commits to apply negotiated WQOs to lower W14 if that reach is found to include fish habitat.	ITT – Agencies	MWLAP	EMA effluent permit for construction and operation
48.		CT	Monitoring – Water Quality Objectives WCC further commits that although EB pit dilutions estimates into Perry Creek for mean annual, freshet and November are reduced by about 20 % from that previously modeled, that water quality objectives will be met at site PC2.	ITT – Agencies	MWLAP	EMA effluent permit for construction and operation
49.			Monitoring – Water Quality Objectives WCC further accepts that Perry Ck modeling did not include East Pit ground water flow estimates, but nonetheless commits to meeting WQO at site PC2.	ITT – Agencies	MWLAP	EMA effluent permit for construction and operation
50.			Monitoring – Water Quality Objectives As part of the final water quality objective development process (in permitting), WCC will provide complete mapping of wet/dry	B. Carmichael memo, Oct 28, 04	MWLAP	EMA effluent permit for construction and operation

			oxbows/wetlands located in the Wolverine floodplain adjacent to the mine site and will identify which are proposed for what use (baseline, sediment polishing, both, etc).			
51.		PT	Water Management – Sediment Ponds The current designs for SP14 and SP18 will temporarily flood large areas outside of these ponds during storm events. For the SP14 pond, the additional area is about 40%, for the SP18 Pond it will be about 400% larger. This will increase the infiltration area, and impound water for a longer period of time to promote infiltration beneath the Plant site area. Infiltration cannot be promoted in the SP12 area, as it would increase seepage to the tailings interception system. Infiltration opportunities will be exploited when constructing the other settling ponds, but only where it would not compromise embankment stability or selenium management plans. Areas of temporal flooding surrounding SP 14 and SP18 will be shown on the design drawings.	ITT – Agencies	MWLAP	EMA effluent permit for construction and operation
52.		CT	A comprehensive sediment collection program was completed in September, 2004. As agreed to in discussions with MWLAP, selenium analysis will also be conducted on the sub 63 micron fraction to assess baseline conditions, as well as to assess the potential utility of selenium accumulation in sediments as a monitoring tool. Results will be submitted and reviewed in conjunction with permitting.	ITT – Agencies	MWLAP	EMA effluent permit for construction and operation
53.		PT	Water Management – EB Pit Detailed mapping for the small alpine pond near the EB pit and related water management plan will be provided at the permitting stage for EB pit.	ITT – Agencies	MWLAP	EMA effluent permit for operation
54.		CT/PT	Water Management – Effluent Discharge	ITT –	MWLAP	EMA effluent permit

			If water quality dictates that settling pond water be conveyed directly to the Wolverine River, the conveyance pipe from SP6 will have a diffuser at the end to distribute the flow over at least a 5m width. A diffuser could also be added to the end of the SP12 pipe, if necessary.	Agencies		for operation
55.		PT	<p>Water Management – Sediment Pond Construction</p> <p>Further information on sediment ponds to be provided in permitting – MEM Mine Permit and Water Act Licence application, if applicable (Perry Creek – Fall 2004; EB Pit deferred for several years):</p> <ul style="list-style-type: none"> <li>• Sedimentation pond works designed and reviewed by a P.Eng registered in BC.</li> <li>• P. Eng to supervise construction</li> <li>• Conceptual engineering plans will be provided to LWBC prior to construction being permitted. As-built drawings will be submitted following construction. All works will be constructed in accordance with Provincial regulations and to the satisfaction of the Regional Water Manager.</li> <li>• Agreements with those who hold land which may be encroached upon by the sedimentation ponds</li> </ul> <p>Consultation with the LWBC Dam Safety Officer to ensure that all concerns are addressed.</p>	ITT – Agencies MEM- LWBC	MEM LWBC	Mines Act permit Water Act Licence
56.			<p>Water Management – Water Act Approvals</p> <ul style="list-style-type: none"> <li>• Requirements for Water Act approvals of culverts and diversions ditches will be defined in conjunction with Permitting.</li> <li>• All works will be designed and reviewed by a P.Eng registered in BC</li> <li>• P.Eng will supervise construction of the works.</li> </ul>	ITT – Agencies MEM- LWBC	LWBC	Water Act approval

			<ul style="list-style-type: none"> <li>• If and as required, Applications for Water Act approvals will be submitted in the fall of 2004.</li> <li>• Fees will be forwarded to LWBC's regional office when the application is made.</li> </ul>			
57.	Selenium Management Plan	CT/MG	<p>Selenium Management Plan</p> <p>WCC commits to effectively manage selenium at Wolverine Coal by minimizing surface flows in contact with problematic waste rock and by handling PAG and high selenium waste rock and CCR by methods approved by MEM., WCC commits to the monitoring program as outlined in the Additional Information Report, with modifications, as needed, at permitting. WCC commits to the management of surface discharges and groundwater seepages to meet the objectives of the selenium management plan. WCC commits to evaluate the need for artificial cover on the tailings dam at closure. If monitoring results indicate changes to fish tissue metal levels related to its operations, WCC commits to assess the biological significance of the change, and/or implement remedial actions, potentially including Se treatment options.</p>	ITT – Agencies	MEM MWLAP	Mines Act permit
58.		CT	<p>Selenium Management Plan</p> <p>WCC commits to develop an enhanced effluent management approach acceptable to WLAP, if warranted by demonstrated, or potentially significant, negative impacts on fish or waterfowl.</p>	ITT – Agencies EPD Item 102 B. Carmichael memo, Oct 28, 04	MWLAP	EMA effluent permit for operation
59.		CT	<p>Selenium Management Plan</p> <p>WCC's selenium management program has the following objectives: To provide a sound scientific database for impact assessment,</p>	Additional Information Report 10.5.3	MWLAP MEM	Mines Act permit EMA effluent permit for construction and operation

			<p>setting environmental effects monitoring objectives related to selenium, and risk-based adaptive management during operations; To ensure that a range of management options is considered and appropriate measures are adopted, with contingencies identified; To develop public and regulatory confidence that the selenium issue can be successfully managed; and to ensure that potential liabilities are avoided during operation and closure. The program includes:</p> <ul style="list-style-type: none"> <li>• reviewing, and compiling, information to establish baseline conditions in the Wolverine River and Perry Creek;</li> <li>• documenting existing conditions at selected sites in the Wolverine and Murray rivers to provide a basis for cumulative effects assessment related to water quality and aquatic resources;</li> <li>• conducting predictive studies on selenium release from mine waste rock, CCR, and tailings</li> <li>• incorporating selenium management considerations in mine waste management planning and reclamation planning to reduce selenium release at source</li> <li>• defining monitoring programs, and</li> <li>• defining site-specific contingencies for implementation in the event that selenium levels in the areas of concern begin to rise.</li> </ul>			
60.		CT/MN	<p>Monitoring Programs – Selenium /Aquatic Resources</p> <p>Monitoring of specific aquatic resources will be conducted at Perry Creek. Selenium levels in water, periphyton and benthos will be used to monitor changes in the receiving environment during operations and closure. Monitoring of</p>	Additional Information Report 10.5.3	MWLAP	EMA effluent permit for construction and operation

			<p>benthic invertebrates and periphyton will commence on a yearly basis at PC-3 following the construction phase of the EB Pit operation. Since levels of selenium in Perry Creek will increase slowly over time as the footprint of wasterock increases,</p> <p>Monitoring of these food vectors will provide an effective early warning system for potential effects to waterfowl and fish. Significant increases that are 50% or greater from baseline values will trigger additional investigations.</p>			
61.		CT/MN /MG	<p>Selenium Management Plan - Waterfowl habitat: Monitoring based on the area's ecological sensitivity will determine the need for further mitigation; and mitigation will be conducted as needed. Two contingency options have been identified as preferred means to control selenium levels in groundwater flows to the Terry Ranch wetland area: 1) diverting clean water to the wetland to provide additional dilution; and 2) interception of contaminated seepage using a French drain upstream of the wetland.</p> <p>A final contingency measure if needed to control effects on the Terry Ranch wetland could include the collection and treatment of site effluents prior to entry into waterfowl habitat. At closure, measures which will reduce the loading of selenium to the wetland include the diversion of mine waters around the wetland area via: 1) removal of the SP6 Pond and lining the W6 channel; and 2) improving ditching along the FSR.</p> <p>A reconnaissance waterfowl survey has been conducted in the zones between the Mine Area and the Wolverine River to assess: (1) waterfowl use of these areas, and (2) waterfowl food</p>	Additional Information Report 10.5.3	MEM MWLAP	

			<p>sources. Based on this evaluation, appropriate baseline monitoring will be finalized at permitting for water, sediments, benthos, and periphyton components.</p> <p>Groundwater monitoring downgradient of mine facilities will provide early warning for the potential for selenium inputs to floodplain backwaters and habitats (Section 10.9.5), while monitoring of selenium concentrations in aquatic resources in these areas (water, sediments) will be used to as early warning for potential selenium vectors to waterfowl. The potential use of selenium levels in benthos and periphyton will be reviewed at permitting.</p>			
62.		CT/MN /MG	<p>Selenium Management Plan - Pit Lakes: Monitoring of aquatic resources (e.g., water, sediments, periphyton) in the EB pit lakes at closure will be used to identify potential impacts to waterfowl and other wildlife. If Pit Lake water quality is shown to be incompatible with wildlife, both pits will be back filled above the pit decant elevations to prevent any surface ponding. A 5 m deep channel would be constructed from the East Pit Lake to lower the water level and reduce total backfill requirements to approximately 100,000 m<sup>3</sup> (Section 10.5.4.6.7). In the low probability event that acidic conditions develop within the back-filled lakes, final contingency will include the collection and treatment of site effluents.</p>	Additional Information Report 10.5.3	MEM/M WLAP	Mines Act permit at closure
63.		MN	<p>Monitoring – Wetland WQ monitoring of the wetland areas (oxbows and wetland on Terry Ranch) was conducted in August 2004. Results will be reported in conjunction with permitting. WCC commits to oxbow and wetland water Se sampling during spring of 2005 (as part of baseline). This is</p>	ITT – Agencies	MWLAP	EMA effluent permit for construction and operation

			included in program.			
64.		MN/PT	Monitoring – Wetland WCC is committed to measuring composite benthos and sediment on an appropriate schedule in the wetlands through mine life. Monitoring of selenium in water is proposed as the early indicator; monitoring of other parameters in the wetlands should not be required on as frequent a basis if water Se levels do not exceed 2ug/L. WCC will revisit the frequency of sampling during permitting.	ITT – Agencies	MWLAP	EMA effluent permit for construction
65.		CT	Selenium Management Plan- Waterfowl WCC commits to protecting waterfowl. In order to minimize the risk associated with waterfowl exposure to selenium in the sedimentation ponds, it will be important to minimize the cover and forage potential of these areas. Vegetation growth will be controlled around the perimeter of the ponds. This will reduce cover, as well as minimize potential food sources (e.g., seeds from grasses and sedges). If it is shown that these systems are used to a great extent by waterfowl, other measures will be take as appropriate. Options include a monitoring program to monitor selenium in available food sources, or other measures to discourage use of these sites. In ponds where selenium concentrations are low, WCC will re-evaluate proposed riparian vegetation management approaches.	ITT – Agencies	MWLAP MEM	Mines Act permit EMA effluent permit for construction and operation
66.		PT	Selenium Management Plan – Waterfowl WCC commits to enhanced management (collection and treatment of site effluents) at EB, if necessary. If, at the time of permitting for EB pit, the predicted maximum selenium concentrations in Perry Creek exceed acceptable limits, WCC	ITT – Agencies	MWLAP	EMA effluent permit for construction of EB Pit

			commits to, as appropriate and as agreed with EPD: 1) assess fish tissue Se levels and their biological significance; and 2) demonstrate that effluent quality will be acceptable for discharge to Perry Creek, or, if effluent quality is not acceptable for discharge, to 1) to implement selenium treatment options. or 2) pipeline the discharge to the Wolverine River, based on discharge to the Wolverine River being acceptable WCC recognizes the requirement for a mutually acceptable effluent management option.			
67.		CT/MN	Selenium Management Plan – EB Pit Through their Waste Management Plan, WCC's will minimize the potential for impacts from metal release, and in particular, selenium from the facilities during operations and post-closure. Specifically, from the EB Pit, risk to Perry Creek from metal leaching (selenium) will be inhibited by controlled disposal of potentially acid generating wastes. Appropriate Monitoring of EB sedimentation pond discharges and aquatic resources (water, sediments, fish, periphyton and benthos) in Perry Creek.	Additional Information Report 10.2-4	MEM MWLAP	Mines Act permit EMA effluent permit
68.	Fuel Management Plan	PT	Hydrocarbon Management Plan WCC is finalizing a fuel management plan, which will be submitted during the permitting process. WCC will comply with the fuel handling criteria outlined in the Provincial Fire Services Act (1996) and regulations, including the BC Fire Code (1998). In addition, the plan will comply with the Fuel Storage Guidelines outlined on the WLAP web site, in various documents for industry, including "A Field Guide to Fuel Handling, Transportation and Storage" (WLAP 2002). In addition, where it relates to spills or waste originating from fuel handling	ITT – Agencies	MWLAP	EMA permit

			activities, WCC will comply with the Waste Management Act, including the Special Waste Regulation, and the Spill Reporting Regulation.			
69.	Chemicals and Materials Storage and Handling	CT	Hazardous Materials Management Plan The petroleum products, explosives and miscellaneous hazardous materials required for construction will be stored in facilities that comply with applicable requirements of the code (e.g. Secondary containment). All containers used to store hazardous materials will be closed and sealed at all times when they are not in use. Where appropriate, 20 ft. steel shipping containers will be used for storage of hazardous materials, such as ammonium nitrate. Secondary containment will be provided as required. The storage facilities provided by various Contractors will be clearly identified as storage facilities for hazardous materials with WHMIS labelling and MSDS sheets readily available.	Additional Information Report 3.12	WLAP	EMA permit
70.	Explosives Storage	CT	Effluent Management Plan - Explosives Storage Final design for the explosives storage site will be the responsibility of a third party contractor. WCC will work with the contractor to ensure that acceptable water quality standards are met. Acceptability of discharge to SP2 will be evaluated at permitting, and alternatives presented as necessary. Standard best management procedures practices for facilities of this type will be adopted.	ITT – Agencies	MWLAP NRCAN	EMA effluent permit for operations
71.	Environmental Management System	CT	Environmental Management System WCC is developing a comprehensive Environmental Management System (EMS) to guide activities at the Wolverine Minesite. WCC's EMS for the project will include corporate-level elements, as well as project/site-level elements addressing all stages of the	Additional Information Report 10.3.1 and 10.2	EAO MEM MWLAP	Environmental Assessment Certificate

			<p>project, including: Exploration and pre-development monitoring; Construction, and Operations. The EMS will provide the key means to transfer commitments made during environmental assessment, planning and design to the construction and operations phases, so that environmental management objectives are met cost-effectively and a high level of environmental compliance is achieved. WCC is committed to fulfilling their obligations to the environment and to local communities and First Nations while pursuing economic development of the Wolverine Coal Mine and other projects in the northeast area. WCC is also committed to the mitigation of risks caused by potential accidents, malfunctions and non-performance. Related operational measures, monitoring, and contingency measures are identified in Table 10.2-4 of the Additional Information Report</p>			
72.		CT	<p>Environmental Supervision Plan  WCC has employed an Environmental Superintendent who will be responsible for implementing environmental protection and monitoring plans at the site. Direction on overall design and scope of monitoring programs will be provided by the VP, Environmental and Regulatory until otherwise defined. The ES will be responsible for implementation of environmental protection plans. He will work proactively with staff and contractors to anticipate and prevent environmental incidents, and will monitor operational performance. The Environmental Superintendent will report to EPD on operational matters, including environmental incidents, and management of day-to-day issues related to construction and operations. Timing and frequency of reporting to EPD will</p>	ITT – Agencies	EAO MEM MWLAP	Environmental Assessment Certificate

			vary with type of report. The ES, or another on-site staff person, will report environmental incidents directly to the Provincial Emergency Program and to regional EPD immediately.			
73.		MN/CT /PT	Monitoring – Construction Effluent and Receiving Water On-site readings of turbidity will be measured daily during initial periods of construction until agreed otherwise by EPD. Frequency and timing of other reporting will be as specified by EPD (within the limits of reasonable lab turnaround and report preparation times, including review by the ES and VP, Environmental & Regulatory). WCC will provide a flow chart for responsibility and timing for notification of non-compliance in the Construction Effluent Permit Application. The Mine Manager, the Environmental Superintendent, Construction Manager, and other superintendents will have the authority to shut down mine construction activities that have caused or are likely to cause impact to receiving waters.	ITT – Agencies	MWLAP MEM EAO	EMA effluent permit for construction Environmental Assessment Certificate
74.		CT/MG /MT	Environmental Management System WCC will maintain responsibility for operation of the mine and all environmental programs and reclamation activities on site. The Mine Manager will maintain overall responsibility for all activities on site. An Environmental Superintendent will be employed on site to implement and monitor all of the environmental and reclamation programs. During construction and mining activity the Environmental Superintendent will be on site to: Ensure the construction, maintenance and operation of environmental control measures; Conduct monitoring programs; Provide direction and	Additional Information Report 10.8.2	MEM MWLAP EAO	Environmental Assessment Certificate

			recommend implementation measures aimed at minimizing environmental impacts; Ensure soil salvage and replacement activities are carried out appropriately in order to meet reclamation objectives; work with contractors to Implement erosion control measures; Ensure vegetative erosion control; Liaise with regulatory agencies and prepare and submit reports.			
75.	Emergency Preparedness and Response	CT/PT	Spill and Emergency Response Plan WCC has completed a first draft of the Preliminary Construction Phase ERP to demonstrate for the purposes of EA Review, the intended approaches to Emergency Response Issues. This ERP will be reviewed and revised as necessary, to reflect significant changes incurred as the project evolves and construction is initiated. The major purpose of this ERP is to provide a course of action for accidents, release of expected hazardous/toxic substances, system failure, or other emergency situation arising during the construction period. The Emergency Preparedness plan will be submitted at permitting	Additional Information Report Appendix P	WLAP MEM	Mines Act permit EMA Permits
76.		CT	Plant Spill Containment Spills within the plant will all be contained within sloped concrete sumps in the plant. Any spills or operational upsets that fill the plant sumps will overflow into the emergency dump pond. All spills going to the emergency dump pond will be reclaimed and pumped back into the coal process. Any coal solids remaining in the pond will be removed, recycled back in to the plant or discarded in the tailings pond.	ITT – Agencies	MWLAP	EMA permit
77.	Climate	CT	Monitoring - Meteorological Data - Two meteorological stations have been sited in the project area to collect the necessary climate data, one near the Plantsite and one in the EB	Additional Information Report 10.9.3.1	MWLAP	EMA permit

			West Waste Dump area. Monitored parameters will include temperature, rainfall and snowpack.			
78.		MN	Monitoring - Meteorological data Data logger systems will be employed during pre-construction as personnel will not be on site on a continual basis. Temperature will be monitored hourly at the station near the Plantsite using a thermistor and a data logger, as well as a max-min thermometer at the EB site. Rainfall will be recorded with tipping bucket rain gauges at both sites. Snowpack accumulations will be measured by taking snow cores at the two rainfall monitoring sites. Cores will be taken at the end of March, April and May.	Additional Information Report 10.9.3.1.1	MWLAP	EMA permit
79.		MN	Monitoring - Meteorological data - Construction, Operation and Closure: The tipping bucket rain gauges at the Plantsite and EB stations will be upgraded to heated models, and will be maintained through the Construction, Operations and Closure Phase. Thermistor monitoring will also continue through Construction, Operations and Closure. A manual rain gauge and maximum-minimum thermometer will be monitored daily at the meteorological station located above the Plantsite throughout the Operations Phase, and as practicable through the Closure Phase. A manual rain gauge and maximum-minimum thermometer will also be established at the EB Office, when mining operations are underway in this area. This station will be monitored daily while personnel are on site in the Operations and Closure Phase. Snowpack accumulations will be measured by taking snow cores at the two rainfall monitoring sites. Cores will be taken at the end of February, March, April and May.	Additional Information Report 10.9.3.1.2	MWLAP	EMA permit

			No meteorological monitoring is proposed during Post Closure, contingent on the measures that are incorporated into the final Closure Plan. Monitoring data and mitigation measures that are implemented over the course of Mine Operations and Closure may mandate that climate data monitoring be continued through the initial Post Closure Phase.			
80.	Air Quality	CT	Air Quality Management Plan An Air Quality Management Plan (AQMP) was developed to control emissions from the Wolverine Coal Project and reduce potential impacts. Best management practices, mitigation measures and an ambient monitoring program were included. The Terry Ranch is the only known receptor located within 10 km of the Wolverine Coal Mine site. WCC will finalize an agreement with the owners of the Terry Ranch which provides a “no residency” condition to ensure that the ranch will not be used for residential purposes, temporary or permanent.	Additional Information Report 4.6.2.2	MWALP	EMA emission permit for construction and operation
81.		MN	Air Quality Management Plan The focus of an ambient monitoring program for the Wolverine Coal Project would be to determine dustfall levels that result from mining operations and provide input for air quality management control strategies.	Additional Information Report 10.9.3.2	MWLAP	EMA permits for construction and operation
82.		CT	Air Quality Management Plan No known chemical dust suppressants are widely used for winter dust suppression. WCC will take the position that if fugitive dust from haul roads in winter is a problem, WCC will investigate possible solutions.	ITT – Agencies	MWLAP	EMA emission permit
83.		CT	<u>Trace Metal Monitoring Plan</u> Pre-construction: WCC has collected information on pre-disturbance vegetation	Additional Information Report 10.9	MEM	Mines Act permit

			metals/trace element concentrations. This program was completed in the summer of 2004, prior to initiation of construction activities. It covered appropriate browse species, as metal/trace element uptake, particularly selenium, uptake is known to be high in these species. Samples were collected in both the Perry Creek and EB mine areas, and will be analyzed by ICP scan to provide information on a full suite of elements. Particular attention has been paid in this program to selenium, which has been identified as an element of interest in the project area, and is one with a potential impact on forage quality. Vegetation samples were collected in upland and wetland areas, and will be reported in the Reclamation Permit Application.	.2.1.1		
84.			Coal Dust Management. Prior to mining and processing operations, including blasting of any source of coal, WCC will provide a coal dust management plan that identifies the measures to be taken to suppress emissions of coal dust such that the level of dustfall does not exceed the provincial air quality objective of 1.75 milligrams per square decimetre per day, averaged monthly. Monitoring locations for dust fall will be chosen based on a consideration of the risk of dust fall effects. The plan must also identify the process that will be followed to further reduce coal dust emissions if the dustfall objective is exceeded.		MWLAP	EMA air emission permit
85.			<u>Site Productivity Assessment</u> Pre-construction: A limited forest productivity (site index) mensuration field program was conducted in late summer 2004, to document true baseline forest productivity levels prior to site clearing and construction. It will be reported	Additional Information Report 10.9.2.1.1	MEM	Mines Act permit

			in the Reclamation Permit Application.			
86.	Wildlife and Vegetation	CT/MN	Wildlife Management Plan WCC will formalize a wildlife management plan prior to construction, based on the memo from WCC to EAO and MWLAP (November 3, 2004). The plan will include a wildlife monitoring plan to assess the effects of the mining activity on caribou and grizzly bear, to guide and fine-tune reclamation planning, and to assess the success of reclamation. A wildlife sightings book will be maintained at the mine office.	Additional Information Report 10.9.2.2.2	WLAP MEM	Mines Act permit Satisfaction of the Regional Wildlife Manager
87.		CT	New information concerning caribou will be incorporated in the Wildlife Management Plan during annual reviews as information become available.	ITT – Agencies	MWLAP MEM	Mines Act permit Satisfaction of the Regional Wildlife Manager
88.		CT	Wildlife Management Plan WCC will contribute to efforts related to caribou recovery monitoring studies and management planning, in the context of the Caribou Recovery Program. Actions undertaken by WCC will be in the context of an overall strategy led by government for cumulative effects management, and commensurate with our level of impact on key factors affecting the population. WCC notes that the EB area is the key area of concern for this project, and we will not be developing this area for about eight years. In the meantime, other industrial users (Oil and Gas) are active in the area. No major caribou migratory route has been confirmed, but available data are not definitive. WCC will contribute to studies to needed to confirm movement through EB area in the context of the studies mentioned above.	ITT – Agencies	MWLAP MEM	Mines Act permit Satisfaction of the Regional Wildlife Manager
89.		CT	Wildlife Management Plan WCC commits to conduct a ground evaluation of caribou migration routes (e.g., trails) in the area	WWG Aug 26 Action Item 8	MWLAP MEM	Mines Act permit Satisfaction of the Regional Wildlife

			of the EB Pit prior to EB Mine Permit Application, and also commits to integrate data from the ongoing caribou monitoring program.	WWG July 23 Action Items 4 & 8		Manager
90.		CT	Rare Plants WCC has carried out a preliminary study to identify potential rare plants in the area. Results will be reported in the Mine & Reclamation Permit Application.	ITT – Agencies	MWLAP MEM	Mines Act permit
91.		MT	<p><u>Wildlife Management Plan - Construction:</u></p> <ul style="list-style-type: none"> <li>• Slopes of all ditches and engineered embankments/dams/settling ponds, are a minimum 2H:1V or 2.5H:1V (horizontal: vertical). With this low-slope design, additional caribou/wildlife ramps or passageways are not required.</li> <li>• Wildlife interactions and sightings are reported and a daily log is kept to improve understanding of use of the site.</li> <li>• Roads are monitored daily for road kill, with carcasses removed and disposed of according to practices acceptable to WLAP.</li> <li>• A Wildlife awareness program is provided on-site to all employees, reinforced with notices posted to discourage worker contact with wildlife, e.g. “No Hunting”, “Do Not Feed Wildlife” or “Do Not Approach Wildlife for that Special Picture”. Disciplinary procedures are implemented for infractions of this policy.</li> <li>• Elimination of all sources of food odours is an ongoing priority on site. Employees are required to return all food waste from bagged lunches to the camp. Discarding food scraps or organic waste to the environment is strictly controlled. Sealed garbage containers are sprayed with a mild bleach solution (inside and out)</li> </ul>		MWLAP MEM	Mines Act permit Satisfaction of the Regional Wildlife Manager

			<ul style="list-style-type: none"> <li>• Whenever they are emptied.</li> <li>• A procedure acceptable to the Regional Wildlife Manager will be developed to deal with Problem Bears (update)</li> <li>• The site Security and/or Manager of Environment controls a registered gun on site during construction to deal with problem wildlife (rifle or shotgun c/w warning and live ammunition). The gun is registered and stored per Federal regulations. A protocol to be provided to Regional Wildlife Manager for approval.</li> </ul>			
92.		MN	<p><u>Wildlife Management Plan - Construction and Operation:</u></p> <ul style="list-style-type: none"> <li>• Section C4.6 of the Final Project Report Specifications requests a terms of reference for a post-construction monitoring program for any species in the project area that are listed by COSEWIC, provincially listed, or are species of management concern. WCC proposes to develop the requested terms of reference prior to operations for species determined to be applicable through the 2004 field studies. As described in Sections 12.6, 13.4 and 13.5, WCC will also be exploring opportunities to collaborate with a regional mountain caribou monitoring studies.</li> <li>• <i>Road kills.</i> Any mortalities of wildlife on mine roads and on the Wolverine Forest Service Road during construction and operation at the mine will be recorded (date, species, age, sex, location).</li> <li>• <i>Grizzly bears.</i> Sightings of grizzly bears or their sign (tracks, scat) in or around the mine during construction and operation will be recorded in the mine's wildlife record</li> </ul>	Additional Information Report 10.9.2.2.2	MWLAP MEM	Mines Act permit Satisfaction of the Regional Wildlife Manager

			<p>book. Grizzly bear mortalities within MU 7-21 are already recorded by MWLAP. Records of grizzly bears observed during construction and operation of the mine will provide information on travel routes of bears in and around the mine property for use in detailed reclamation planning.</p> <ul style="list-style-type: none"> <li>• <i>Ungulates.</i> A ground or aerial survey (RIC 1998, 2002) will be carried out during construction, and periodically during operations, to monitor ungulates in the vicinity of the mine either by WCC or by WCC support to ongoing caribou recovery studies. Ungulate numbers and locations will be compared with the results of MWLAP/MOF pre-construction survey flights. Some recent radio-collar data exists for the Quintette caribou herd from an ongoing project at UNBC (Jones <i>et al.</i> 2004). It can be used to document baseline caribou movements before the project for comparison purposes. The purpose of the ungulate surveys is to assess ungulate habitat use and movements in the vicinity of the mine in order to guide and fine-tune reclamation and mitigation planning for the species.</li> <li>• <i>Waterfowl.</i> At Permitting, WCC will report data from the additional spring 2004 waterfowl surveys in the wetland at the Terry ranch, in flooded areas between the Perry Creek pit and plant and the Wolverine River, and in the Wolverine River main channel. The objective of these waterfowl surveys was to provide repeat sampling to document the numbers and species of waterfowl using these areas, thus</li> </ul>			
--	--	--	--	--	--	--

			strengthening the database for the selenium monitoring plan (see section 10.5.3). This baseline data will guide the development of the bird component of selenium monitoring programs, in the event that increases in selenium are measured in wetland water column and sediments.			
93.		CT/MG	Wildlife Management Plan WCC will implement an appropriate firearms policy for the site, in response to hunting pressure on moose.	WWG, Aug 26	MWLAP MEM	Mines Act permit Satisfaction of the Regional Wildlife Manager
94.		MN	<u>Wildlife Management Plan - Reclamation and Post-Closure Phase:</u> Monitoring of wildlife and bird use of habitats will be conducted periodically as reclamation of Perry Creek advances to document the use of reclaimed habitats as one component in assessing the success of the reclamation program.	Additional Information Report 10.9.2.2.3	MWLAP MWLAP MEM	Mines Act permit Satisfaction of the Regional Wildlife Manager
95.		MG	<u>Wildlife Management Plan</u> General mitigation strategies will be implemented through ongoing input into the location, design and construction of project components (Western Canadian Coal 2003). Disturbance of vegetation will be minimized to the extent practical ; Clearing of vegetation will not result in the injury, molestation or destruction of migratory bird or it's egg; the nest of an eagle, peregrine falcon, gyrfalcon, osprey, heron or burrowing owl; or the nest of a migratory bird when the nest is occupied by a bird or its egg, unless exempted by the Regional Manager, Environmental Stewardship Division, Ministry of Environment under authority of the <i>Wildlife Act</i> Permit Regulation; Disturbed areas will be stabilized and reclaimed	Additional Information Report 10.6.3.1	MWLAP MEM	Mines Act permit Satisfaction of the Regional Wildlife Manager

			<p>on a progressive basis;  Native vegetation species will be used for reclamation when appropriate;  There will be ongoing monitoring for specific elements of importance to wildlife such as dens, nests, coarse woody debris and movement corridors (These elements will be documented and protected if at all feasible);  Road design will attempt to minimize the potential for road kill by providing appropriate sight lines and drivers will be instructed that wildlife has the right of way as long as this is safe.</p>			
96.		MG	<p><u>Wildlife Management Plan - Road kills</u>  If monitoring programs indicate that significant numbers of road kills are occurring, or if high use areas are identified along the Wolverine FSR, mitigative measures will be implemented to reduce risk of vehicle-animal collision (lower speed limits, warning signs, improvement of visibility, worker advisories).</p>	Additional Information Report 10.9.2.2.4	MWLAP MEM	Mines Act permit Satisfaction of the Regional Wildlife Manager
97.		MN	<p><u>Reclamation Monitoring - Trace Metals and Productivity</u>  WCC will collect and report information on pre-disturbance vegetation metals/trace element concentrations. It is proposed that this program would cover appropriate browse species, such as grasses and willows, and would include native legumes, as metal/trace element uptake, particularly selenium, uptake is known to be high in these species. Standard forestry regeneration and productivity monitoring will be conducted on reclaimed and reforested land, to evaluate and document achievement of equivalent capability and forestry end land use objectives. Monitoring of the reclaimed landscape will be conducted both immediately</p>	Additional Information Report 10.9.2.1	MEM	Mines Act permit

			after reclamation treatments, to assess success in re-establishing vegetation on the reclaimed landscape, and over time prior to application for reclamation release, to assess the effectiveness of the reclamation program in achieving equivalent capability and end land use objectives.			
98. 8	Surface Water	CT	Water Quality Monitoring and Management Plan WCC's water management plan for the Wolverine Project include plans for local diversion, routing, storage, groundwater withdrawal, use, collection, and treatment of water at various sites within the Project. WCC is committed to surface water monitoring and has designed a program to meet the following objectives: Provide streamflow data specific to the mine site in order to develop an accurate understanding of watershed response to rainfall/snowmelt and to verify the rainfall-runoff hydrologic model developed for this project; Quantify watershed baseflows; Document existing runoff water quality and measure the effectiveness of erosion control and sedimentation measures; Along with water sampling and ARD/ML program results, provide data to update predictions of water quality impacts, and to support ongoing review of mine water and waste management strategies during operations and at closure; and Provide long term surface flow data for Perry Creek for use in applications for the Mine and Reclamation Permit, and the Waste Management Permit for EB Pit.	Additional Information Report 10.4 and 10.9.4	MWLAP	EMA permit
99.		CT	Monitoring Plan - Surface & Groundwater Drainage Flows - Pre-construction: <ul style="list-style-type: none"> <li>• Additional baseline monitoring of surface flows will be done at the W6, W14, and</li> </ul>	Additional Information Report 10.9.4.1	MWLAP	EMA effluent permit

			<p>Perry Creek gauging sites (Table 10.9.4-1). The Wolverine River gauging site at Mast Creek will be incorporated into the monitoring plan.</p> <ul style="list-style-type: none"> <li>• A permanent stream gauging site was installed in the W14 Tributary, above the proposed Haul road to the coal dump. The old site on Perry Creek was relocated to a more favourable location. Monitoring is ongoing.</li> <li>• The Perry Creek site will provide data for an undisturbed basin until the EB Pit is developed, after which time it will measure impacts from mining activities. Continuous flow data will be collected at the Perry Creek and W14 sites using a data logger and a pressure transducer calibrated to a staff gauge and gauging data. Consideration will be given to tying the W14 system into the Plantsite operations system (e.g. SCADA system) after the mine is in production. The Wolverine River gauge will be read manually, at weekly intervals during periods of high flow, and at monthly intervals in other periods. Periodic gauging will be done, to verify the stage – discharge relationship.</li> <li>• The existing gauging site in the W6 Tributary immediately above the Wolverine FSR will be monitored until the time that all flows are diverted to a settling pond. Some gauging will also be performed during storm events, to provide information on storm runoff from this basin, prior to mine development.</li> <li>• Standing water in wetlands and meander scars located between the Wolverine River and the Plantsite, Tailings, SP12 and SP6</li> </ul>			
--	--	--	--	--	--	--

			<p>areas was mapped in the summer of 2004. Staff gauges were installed at an upstream and downstream location in the Wolverine River, and established throughout the wetland and meander scar areas to establish the hydraulic relationship between these features, the Wolverine River, and groundwater flow discharging from the W14, W12 and W6 fans. Permit applications will include all monitoring well and staff gauge water elevation data and the flow regime over and beneath the Wolverine River floodplain will be interpreted.</p>			
100.		MN	<p>Monitoring Plan – Water Management - <u>Construction, Operation and Closure:</u></p> <ul style="list-style-type: none"> <li>• Surface flows monitoring will be conducted at the W14, Perry Creek and Wolverine River gauging stations according to the schedule Table 10.9.4-1 (attached).</li> <li>• The staff gauges located within the Wolverine River floodplain will be monitored during periods of dry weather. If monitoring data indicate measures to supply groundwater, intercept tailings seepage or control selenium loading to lentic areas have significantly affected standing water levels in the floodplain area, mitigation measures will be implemented.</li> </ul>	Additional Information Report 10.9.4.11	MWLAP	EMA permit
101.		CT/MG	<p>Wildlife Management Plan – waterfowl habitat If water level monitoring data for the waterfowl habitat between the Project Area and the Wolverine River during operations indicate seepage control or groundwater supply measures have significantly affected water levels, a habitat impact assessment will be conducted. If habitat impacts are determined to</p>	Additional Information Report 10.9.4.1	MWLAP MEM	Mines Act permit Satisfaction of the Regional Wildlife Manager

			<p>be significant, the following mitigation measures would be evaluated and the most appropriate measure(s) would be implemented:</p> <ul style="list-style-type: none"> <li>• Develop alternate source of supply to reduce groundwater withdrawal rate. Alternate sources that would be considered include seasonal diversion from the SP12, SP14 and SP18 Settling Ponds, and year round diversion from the Wolverine River; and</li> <li>• Divert water to augment flows in impacted areas. It is expected that augmentation rates would be very small, and could be sourced from the W14 Tributary, the Wolverine River, wells or if water quality is acceptable from sediment ponds.</li> </ul>			
102.			<p><u>Monitoring Plan - Settling Pond Flows – Construction, Operation and Closure:</u>  Settling pond decant flows will be monitored for the entire time that the ponds are in service according to the schedule in Table 10.9.4-1. Discharges from settling ponds will be measured to establish the stage-discharge relationship for each pond.  For the smaller ponds (SP14, SP18), decant flows will be measured weekly while flows are discharging, and at twenty-four hour intervals when pond residence time is less than 72 hours. Inflows into the largest Settling Ponds (SP6 and SP12) will be monitored continuously.  Transducers and data loggers will be used to monitor the water level in the inlet channel and in the pond itself, to provide both inflow and outflow data.  Data will be summarized and reported annually. The report format will include tabulations and plots of all data versus time.</p>	Additional Information Report 10.9.4.2	MWLAP	EMA effluent permit
103.			<p><u>Monitoring Plan – Automated Flows for</u></p>	Additional	MWLAP	EMA effluent permit

			<p><u>Flocculent System</u> Pressure transducers will be installed to continuously monitor levels and flows in any Settling Ponds that are serviced with a flocculation system, so that flocculant addition can be automated</p>	Information Report 10.9.4.2		
104.		MN	<p><u>Monitoring Plan- Receiving Water Quality:</u> The proposed monitoring program for receiving waters for monitoring associated with the Perry Creek Pit operation is presented in the Additional Information Report. Monitoring associated with EB Pit operations will be developed at a future date. Sampling of surface waters will be synchronized with flow measurements (volume/time) to allow mass balance calculations. Monitoring of surface water quality with their respective locations will follow the WQ Monitoring Stations and Sampling Frequency for Pre-Construction, Construction, Operations, and Post Closure Periods (Table 10.9.4-2, attached). Sample locations are described in Table 4.7.2-3 (Additional Information Report). Constituents to be analyzed are listed in Table 4.7.2.5 (Additional Information Report). Pre-construction: Monthly monitoring at the Perry Creek and Wolverine River stations commenced following the sampling campaigns for freshet 2004 (May/June) and is ongoing. Cumulative Effects stations on the Wolverine and Murray Rivers will be sampled three times per year during major flow periods (freshet, summer low flow, winter low flow). Similarly, W6 Creek and mine-impacted tributaries will be monitored during the major flow periods during the construction period to develop a more thorough</p>	Additional Information Report 10.9.4.3	MWLAP	EMA effluent permit

			<p>understanding of selenium behaviour in flows draining PAG/PML materials, and will continue up until application of the Waste Effluent Permit (~winter 2005).</p> <p>Construction:</p> <p>The objective is to verify if water quality is affected by construction activities (e.g. soil stripping, deforestation, etc.). The monitoring stations and sampling frequency of the construction phase are the same as those for the pre-construction phase (Table 10.9.4-2, Additional Information Report). However, if preliminary data collected during construction identifies water quality concerns, the monitoring program will be modified accordingly.</p> <p>Monitoring locations will be reviewed as part of the fine tuning of water quality objectives development and construction/operational phase water quality monitoring programs. Construction and operational monitoring programs will be finalized at their respective at permitting. Construction phase monitoring will include daily field turbidity and weekly lab turbidity/TSS monitoring.</p>			
105.		MN	<p><u>Monitoring Plan - Pond Effluent Quality:</u></p> <p>Water quality sampling of Settling Pond decant will be performed to demonstrate the effectiveness of the settling and erosion control measures and compliance with the TSS and turbidity limits that will be set in the Discharge Permits for the settling ponds. Additional parameters (metals, sulphate, nitrogen compounds, etc.) will also be monitored in order to quantify loadings of potentially deleterious parameters (e.g., selenium, sulphate) to the receiving environment. Data will be summarized and reported annually. Monitoring of settling</p>	Additional Information Report 10.9.4-3	MWLAP	EMA effluent permit

			pond decant water quality with their respective locations will follow the Turbidity and TSS Monitoring Schedule (Table 10.9.4-3, Additional Information Report). Monitoring schedules will be detailed at permitting.			
106.		MN	<u>Monitoring Plan- Pond Effluent Quality</u> During the settling pond decant water quality monitoring and when water is flowing, various physical and chemical parameters (listed in Table 4.7.2-5, Additional Information Report) will also be monitored on a monthly basis with their respective locations (listed in Table 4.7.2-3, Additional Information Report)	Additional Information Report 4.7.2-5 and 4.7.2-3	MWLAP	EMA effluent permit
107.		CT	Data from the cumulative effects stations (i.e. WR5, WR6, MR1) were collected in May and August 2004, and will be provided to WLAP in conjunction with permitting	ITT – Agencies	MWLAP	EMA effluent permit
108.	Groundwater	MN	<u>Monitoring Plan – Ground Water</u> WCC's groundwater monitoring network meets the following three objectives: Provides information to determine the direction of groundwater flow; Provides information to estimate the velocity and quantitative rate of groundwater flow; Provides sampling locations to document baseline groundwater quality and any impacts to groundwater quality that result from mining or mining related activities. Monitoring will be continued as per the attached table.	Additional Information Report 10.9.5	MEM MWLAP	EMA effluent permit Mines Act permit
109.		MN	<u>Monitoring Plan- Groundwater</u> Groundwater levels will be monitored quarterly, with static levels recorded prior to sampling. In addition, a suite of monthly data will be collected between March and December during the first year of mine operation, to provide a complete annual cycle of data. Data will be summarized and reported annually. Reports will include	Additional Information Report 10.9.5.1 and 4.8-5	MEM MWLAP	Mines Act permit EMA effluent permit

			elevation versus time graphs, interpreted equipotentials and updated assessments of the groundwater flow directions relative to potential sources of contaminants and the monitoring well network. The objectives for each monitoring site and the recommended sampling schedule are listed in Table 10.9.5-1. Locations are shown in Figure 4.8-5.			
110.		MN	<u>Monitoring Plan -Groundwater Quality:</u> Groundwater quality sampling will occur quarterly during the Construction, Operations, and Closure Phases of the Project until an adequate data record is available to justify a less frequent sampling program (Table 10.9.5 – 1, Additional Information Report).	Additional Information Report 10.9.5.2	MEM MWLAP	Mines Act permit EMA effluent permit
111.		MN/ MG	<u>Monitoring Plan- Contingency for Monitoring Wetland Groundwater Quality</u> WCC's contingency monitoring plan for managing groundwater is focused on the possible requirement to mitigate impacts to wetlands and waterfowl habitat within the Terry Ranch or at other locations on the Wolverine floodplain. It would be triggered if water quality or water level impacts were identified in any of the valley bottom wetland areas. A contingency to add additional shallow monitoring wells is included in the groundwater monitoring plan. These would be installed in the area surrounding any impacted wetlands, sampled for concentrations of the contaminants of concern and tested to determine the hydraulic conductivity of the alluvium in which they would be completed. Water levels would be monitored for a complete seasonal cycle. The data would then be assessed to delineate and quantify the groundwater flow regime that discharges to the wetland area, and to identify the source area(s)	Additional Information Report 10.9.5.1.4	MEM MWLAP	Mines Act permit EMA effluent permit

			of any contaminant(s) of concern. This information would be used to design an effective mitigation plan.			
112.		MN/ MT	<p>Selenium Management/Monitoring Plan</p> <p>If groundwater quality monitoring indicates high selenium concentrations are migrating beneath the Wolverine Valley floodplain, additional monitoring wells would be installed in the valley bottom area to delineate the areas of concern. Potential mitigation measures to preserve waterfowl habitat are described above in Section 10.9.5.1.4. Possible mitigation measures are: Groundwater interception with French Drains and sumps or shallow wells, to reduce flows and loadings to the wetland during mine operations; Surface flow diversion into the wetland area to augment wetland flow quantities and/or dilute selenium concentrations; Drilling a well near the wetland, to determine if an artesian groundwater supply with acceptable water quality could be developed to adequately augment the wetland flow and/or dilute selenium concentrations.</p> <p>Potential mitigation measures for Post Closure include those identified above, as well as liners, grading, drain construction, or maintenance but could only be implemented after Closure.</p>	Additional Information Report 10.9.5.1.4.1, 10.9.5.4.2, and 10.9.5.2.4	MEM MWLAP	Mines Act permit EMA effluent permit
113.		CT	<p>Monitoring Plan – 2004 Groundwater Data</p> <p>A summary memo re baseline groundwater quality at the Wolverine site (Piteau, July 6, 2004) will be distributed in conjunction with permitting applications.</p>	ITT - Agencies	MWLAP MEM	Mines Act permit EMA effluent permit
114.		MN/PT	<p>Monitoring Plan –Groundwater in East Dump</p> <p>Operational groundwater monitoring downstream of the East Dump will provide more definitive data for assessing potential impacts on Perry Creek, during Perry Creek operations</p>	ITT - Agencies	MLWAP	EMA effluent permit for operation

			and for permitting of the EB Pit area.			
115.		MN/PT	Monitoring Plan –Groundwater in East Dump Monitoring wells will be constructed during the first year of mining in the Perry Creek Open Pit. Adequate data will be available by Year 6 to calibrate and validate a model of the loading along this pathway. As the groundwater flow quantity is estimated to be 0.5 L/s, this pathway would not be an issue unless it was augmented by other loadings from the EB Pit area. Total loadings to Perry Creek, and management of these impacts, will be addressed during Permitting for the EB Pit.	ITT - Agencies	MLWAP	EMA effluent permit for operation
116.	Aquatic Resources	CT	Selenium Management/Monitoring Plan Selenium management is an important component of environmental management for the Wolverine Project. WCC will implement a selenium management program focused on establishing selenium concentrations in a spectrum of aquatic resources (water, sediment, fish, periphyton, benthos, waterfowl).	Additional Information Report 10.9.6 and 10.5.3	MWLAP	EMA effluent permit for operation
117.		MN	Selenium Management/Monitoring Plan WCC has established baseline fish tissue metal conditions for assessing potential impacts of the Wolverine Project on fish tissue metal levels. After reviewing the results of the 2004 sampling survey, WCC will continue to monitor the selenium concentrations through fish and fish habitat sampling surveys to meet the objectives of the Selenium Management Plan.	Additional Information Report 4.9.2, 10.5.3 and Addendum Report, Appendix 2	MWLAP	EMA effluent permit
118.		MN	Monitoring Plans - Water quality and Aquatic Resources WCC will monitor the effects of the Project on aquatic resources during construction and operation, and will include a combination of: 1) benthic invertebrate and periphyton monitoring; 2) effluent characterization and water quality monitoring; 3) sublethal toxicity	Additional Information Report 10.9.6.3.1	MWLAP	EMA effluent permit

			testing; and 4) sediment monitoring.			
119.		MN	Selenium Management/Monitoring Plan WCC has committed to acquire a suitable baseline data set prior to construction. A comprehensive sediment survey was completed in August 2004 (refer to #52)	ITT – Agencies	MWLAP	EMA effluent permit
120.		MN	Monitoring – Aquatic Resources WCC recognizes some limitation with the 2004 biological baseline (due to high flow conditions, at least on the Wolverine main stem) and commits to repeating necessary components of that baseline during 2005. WCC recognizes the need to protect the baseline environment from construction related impacts and commits to avoid such impacts, particularly with regard to suspended sediments.	ITT – Agencies EPD Item 35, 38 B. Carmichael memo, Oct 28, 04	MWLAP	EMA effluent permit
121.	Reclamation	MN	Monitoring - Reclamation Plan Monitoring of the reclaimed landscape will be conducted both immediately after reclamation treatments, to assess success in re-establishing vegetation on the reclaimed landscape, and over time prior to application for reclamation release, to assess the effectiveness of the reclamation program in achieving equivalent capability and end land use objectives. Initial reclamation monitoring would include programs such as planting quality assessments and regeneration surveys designed to monitor reforestation success. Later monitoring programs would include programs to assess longer-term productivity and sustainability of reclaimed vegetation. Standard forestry regeneration and productivity monitoring will be conducted on reclaimed and reforested land, to evaluate and document achievement of equivalent capability and forestry end land use objectives. Monitoring will	Additional Information Report 10.9.2.1.1	MEM	Mines Act permit

			<p>follow methods and objectives similar to current Free-to-Grow standards, to investigate stocking and productivity levels.</p> <p>Additional programs might include assessment of forage stand productivity and sustainability for achievement of livestock grazing end land use objectives, and assessment of species composition and stocking density for achievement of wildlife habitat end land use objectives.</p> <p>Monitoring programs will also include assessment of post-closure soils and vegetation metals/trace element concentrations, as currently required by the Health, Safety and Reclamation Code.</p> <p>Reclamation monitoring will continue until such time as WCC demonstrates that the site has been satisfactorily reclaimed.</p>			
122.	Aboriginal and First Nations Communities		<p>WCC commits to providing opportunities for First Nations and Aboriginal communities to participate in the economic benefits of the project through contracting, jobs, training, and/or other community benefits.</p>			
123.			<p>WCC commits to establishing a scholarship fund open to members of First Nations in the project area, and the Aboriginal communities at Kelly Lake.</p>			
124.			<p>WCC commits to initiating a Public and Aboriginal Environmental Advisory Committee to provide opportunity for interested parties to be involved in review of and input to ongoing environmental and reclamation programs at the mine. The committee will be initiated prior to significant construction-related surface disturbance at the Wolverine Mine, and will continue through operations, provided interest and participation levels warrant.</p>			

125.			WCC commits to implementation of the Co-operation agreement signed with the West Moberly First Nation. WCC further commits to make reasonable efforts to conclude mutually acceptable agreements with other interested First Nations and Aboriginal communities in the area.			
126.	Other Stakeholders		<u>Licensed Guide Outfitter # 721P998</u> WCC is waiting for a response from the BC Guide Outfitters Association (representing the licensed guide outfitter) regarding WCC's latest offer, and will continue to pursue settlement of this matter.			
127.			<u>Licensed Trapper #721T006</u> WCC will continue to pursue settlement of this matter.			
128.			WCC has committed to local hiring for construction and operations.			

**Abbreviations:**

AIR - Additional Information Report

ARD – Acid rock drainage

CCR – Coarse Coal Rejects

CT - Denotes a commitment made by the Proponent to complete or carry out the stated action.

EAO - Environmental Assessment Office

EMA – Environmental Management Act

EMP – Environmental Management Plan

EMS – Environmental Management System

EPD – Environmental Protection Division of MWLAP

ES - Environmental Supervision

ITT - Issue Tracking Table

LWBC - Land and Water BC Inc.

MEM - Ministry of Energy and Mines

MEM – Ministry of Energy and Mines

MN - Denotes a monitoring action, the results of which may, or may not, lead to further mitigation measures being taken.

MoF - Ministry of Forests

MSRM - Ministry of Sustainable Resource Management

MT - Denotes mitigation measures to be implemented as a result of the environmental impact analysis and/or discussions with regulatory authorities.

MWLAP - Ministry of Water, Land and Air Protection

MWLAP – Ministry of Water, Land and Air Protection

OGC - Oil and Gas Commission

OMS – Operational Monitoring Stability

PT - Denotes permit terms or conditions

QA/QC – Quality assurances/quality control

WCC – Western Canadian Coal Corp.

WMP – Waste Management Plan

WQO – Water Quality Objectives