REPORT

ICMI CERTIFICATION SUMMARY REPORT

Long Canyon Mine

Submitted to:

International Cyanide Management Institute (ICMI)
1400 I Street, NW - Suite 550
Washington, DC 20005
United States of America

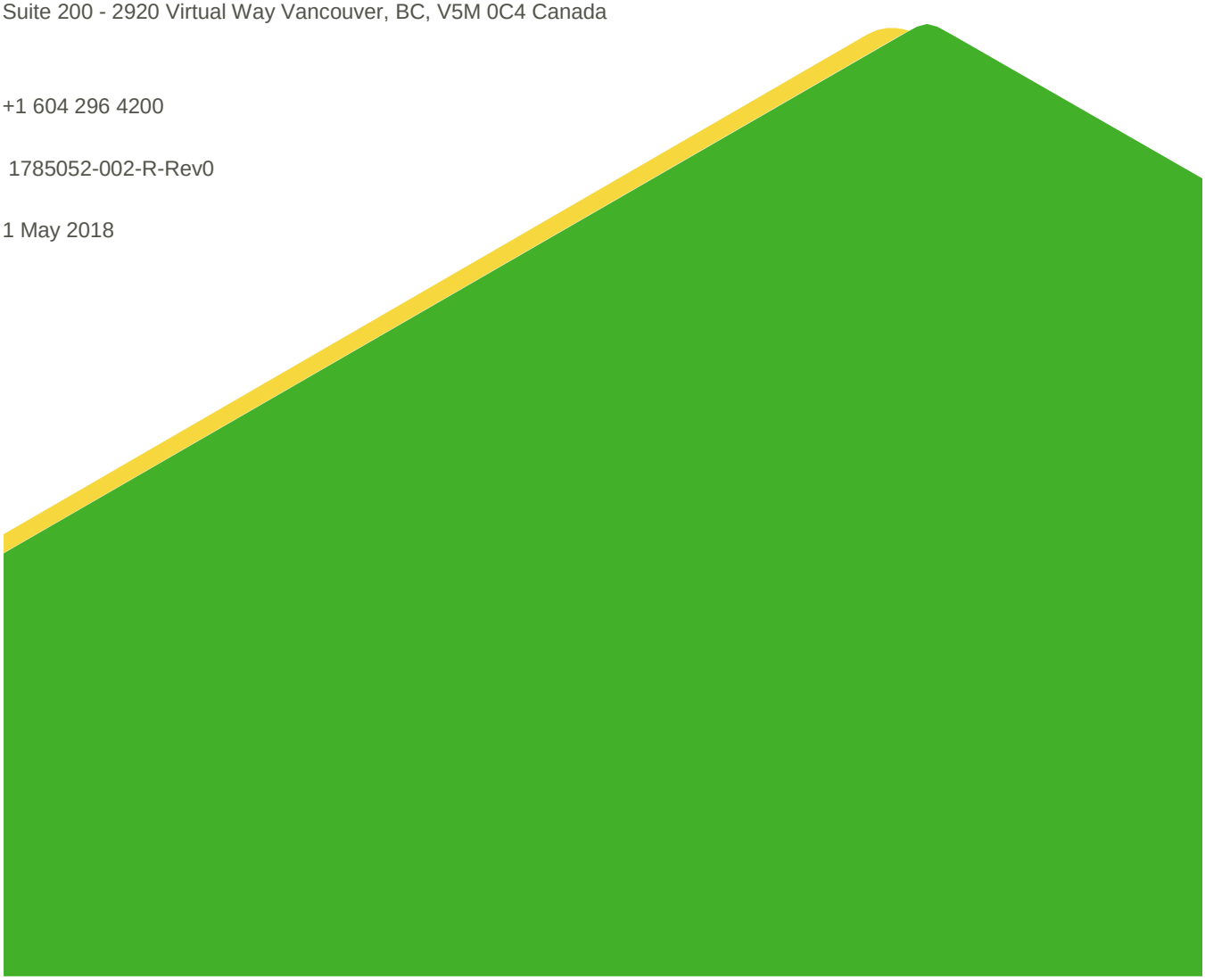
Submitted by:

Golder Associates Ltd.
Suite 200 - 2920 Virtual Way Vancouver, BC, V5M 0C4 Canada

+1 604 296 4200

1785052-002-R-Rev0

1 May 2018



Distribution List

2 copies (1 pdf) - ICMI

1 copy - Golder Associates Ltd.

Table of Contents

FIGURES

1.0 SUMMARY AUDIT REPORT FOR GOLD MINING OPERATIONS

Name of Mine:	Long Canyon Mine
Name of Mine Owner:	Newmont Mining Corporation
Name of Mine Operator:	Long Canyon Mine
Name of Responsible Manager:	Gordon Mountford, General Manager Gold Mine

Address:

Long Canyon Mine
Newmont Mining Corporation
688 Johnson Ranch Road
Wells, Nevada

State/Province:	Nevada
Country:	United States of America
Telephone:	+775 778 2216
E-Mail:	Gordon.Mountford@newmont.com

2.0 LOCATION DETAIL AND DESCRIPTION OF OPERATION

2.1 Mine Location

Newmont's Long Canyon Mine (LC) is located in Elko County, Nevada, on the eastern flank of the Pequop Mountains, approximately 27 miles east of Wells, Nevada, and 31 miles west of the Nevada /Utah State border. A site location plan is shown in Figure 1.

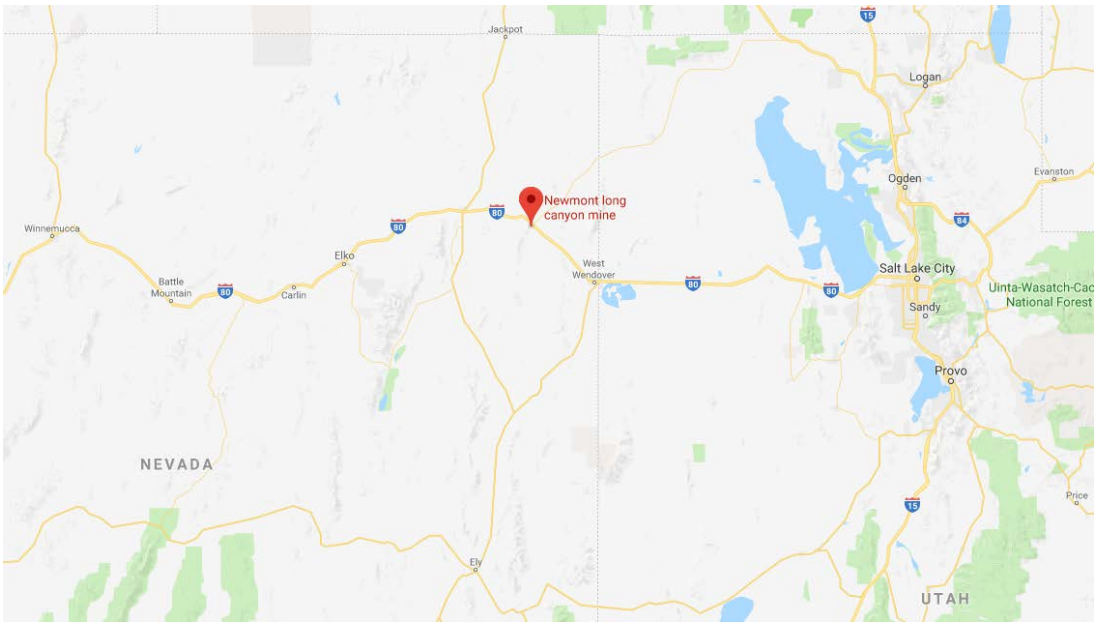


Figure 1: Site Location Plan

Long Canyon is located on 3,875 acres of land that is a combination of privately held land, and land administered by the U.S. Bureau of Land Management (BLM).

2.2 Background

Mining began at LC in 2016, with production commencing in 2017. LC is permitted to process up to 5 million tons of ore annually, with developments that consist of:

- an open pit;
- a heap leach facility (HLF);
- a carbon-in-column (CIC) plant;
- a waste rock storage facility (WRSF); and
- support facilities including a truck shop and administration building.

A dilute sodium cyanide solution is applied to the stacked ore on the high-density polyethylene (HDPE) lined leach pads. Pregnant solution from the leach pads is collected in perforated piping under the leach pad, and reports to main collection headers that lie in a HDPE-lined Solution Collection Channel along the edge of the heap leach pad. The collection headers report to a Pregnant Solution Tank (PST), and a Process Solution Pond (PSP) is available for solution in case of upset plant operating conditions. The PSP has a total capacity of 17.4 million gallons, and is comprised of two connected internal cells of 4.9 million gallons capacity each, surrounded by a higher perimeter berm. The PSP is constructed with a double-lined HDPE membrane with interstitial leak detection, placed on compacted soil. The PST is an 8,000 gallon tank located on a shelf within the freeboard area of the PSP.

From the Pregnant Solution Tank, the pregnant solution is pumped to the CIC circuit where the gold is adsorbed onto carbon. Solution from the pond can be pumped to either the PST or the Barren Solution Tank inside the CIC building. The CIC circuit is located entirely within one building, adjacent to the PSP. The CIC consists of six carbon columns in series. The pregnant solution cascades from Column 1 to Column 6, while the carbon is advanced from Column 6 to Column 1. From Column 1, the loaded carbon is transferred into the Loaded Carbon Holding Tank then, loaded into transporters and taken to an existing refinery located at Newmont's Gold Quarry / James Creek Project near Carlin, Nevada. The carbon is stripped and regenerated while the gold is processed into dore. Regenerated carbon is returned to LC for reuse. No refining is conducted at LC.

At the exit of Column 6 in the CIC, the barren solution is discharged to a Barren Solution Tank where sodium cyanide is added from two 10,000 gallon storage tanks, before being returned to the HLF. The heap leaching circuit is a closed-loop system with no process water discharge; fresh make-up water is added as required.

Figure 2 provides a process overview of the Long Canyon heap leach facility and carbon-in-column facility.

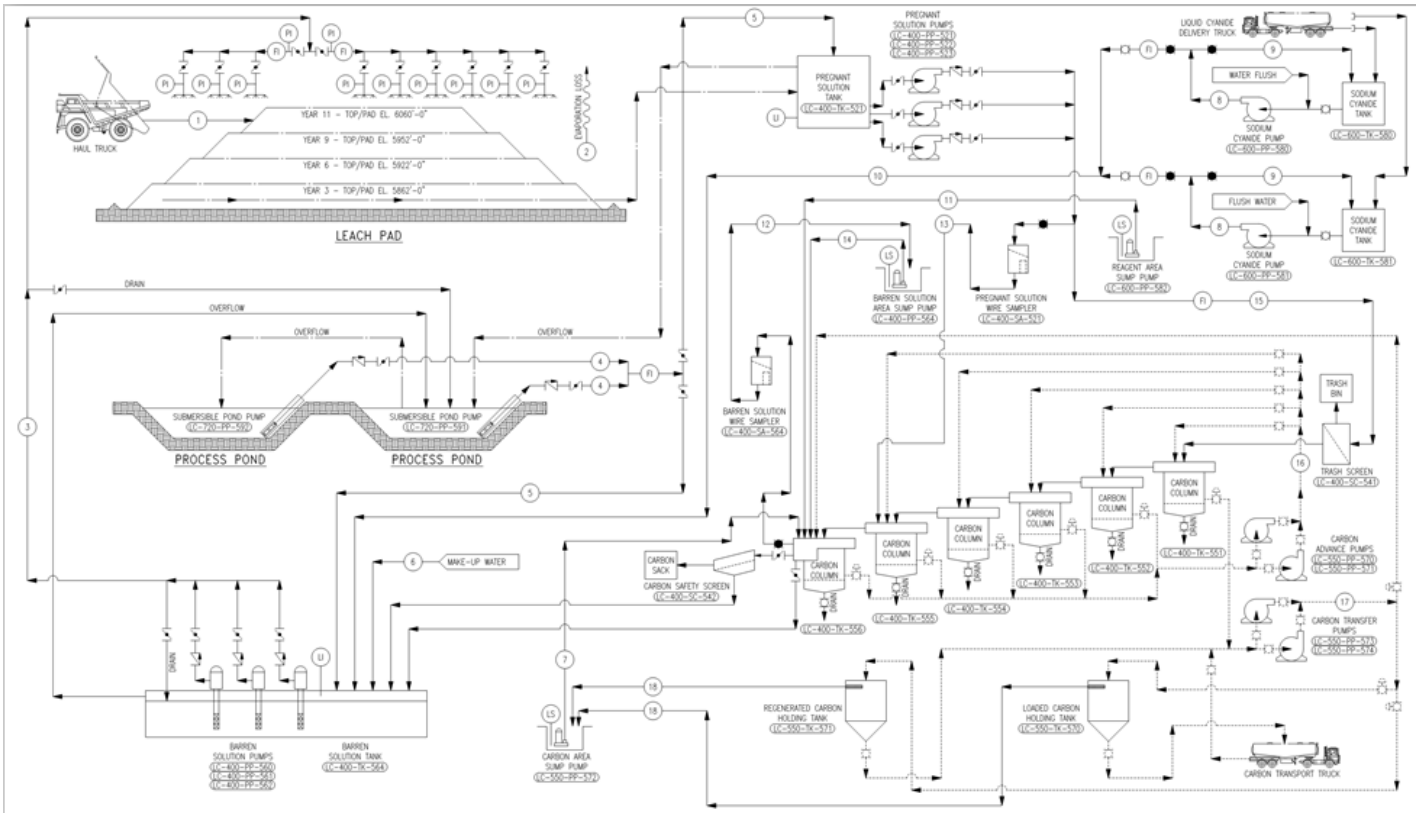


Figure 2: Long Canyon Process Schematic

SUMMARY AUDIT REPORT
Auditors Findings

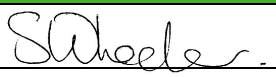
Long Canyon Mine is:	☒ **in full compliance with**	**The International Cyanide Management Code**
	☐ in substantial compliance* (see below) with	
	☐ not in compliance with	

Audit Company: Golder Associates

Audit Team Leader: Evan Jones, Lead Auditor and Mine Technical Specialist

Email: evanjones@golder.com

Name of Other Auditors

Name, Position	Signature
Sophie Wheeler, ICMI Pre-certified Lead Auditor	

Dates of Audit

The Certification Audit was undertaken within three days (three person-days) between 27 November 2017 and 29 November 2017.

I attest that I meet the criteria for knowledge, experience and conflict of interest for Code Verification Audit Team Leader, established by the International Cyanide Management Institute and that all members of the audit team meet the applicable criteria established by the International Cyanide Management Institute for Code Verification Auditors.

I attest that this Summary Audit Report accurately describes the findings of the verification audit. I further attest that the verification audit was conducted in a professional manner in accordance with the International Cyanide Management Code Verification Protocol for Cyanide Gold Mine Operations and using standard and accepted practices for health, safety and environmental audits.

Long Canyon Mine		1 May 2018
Name of Facility	Signature of Lead Auditor	Date

PRINCIPLE 1 – PRODUCTION

Encourage Responsible Cyanide Manufacturing by Purchasing from Manufacturers that Operate in a Safe and Environmentally Protective Manner

Standard of Practice 1.1: **Purchase cyanide from manufacturers employing appropriate practices and procedures to limit exposure of their workforce to cyanide, and to prevent releases of cyanide to the environment**

☒ **in** full **compliance with**

The operation is ☐ in substantial compliance with **Production Practice 1.1**

☐ not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

The operation is in full compliance with Standard of Practice 1.1; purchase cyanide from manufacturers employing appropriate practices and procedures to limit exposure of their workforce to cyanide, and to prevent releases of cyanide to the environment.

Since commencing operations in 2016, LC has exclusively purchased cyanide from the Winnemucca production facility owned by Cyanco Company, LLC. The Cyanco Winnemucca facility has been continuously certified as a producer under the Code since October 11, 2006, with recertification in 2010, 2013, and most recently on November 22, 2016. As the production facility has been continuously certified under the Code while supplying cyanide to LC, the LC operations are in full compliance with Standard of Practice 1.1.

PRINCIPLE 2 – TRANSPORTATION

Protect Communities and the Environment during Cyanide Transport

Standard of Practice 2.1: **Establish clear lines of responsibility for safety, security, release prevention, training and emergency response in written agreements with producers, distributors and transporters.**

☒ **in full compliance with**

The operation is

☐ in substantial compliance with **Transport Practice 2.1**

☐ not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

The operation is in full compliance with Standard of Practice 2.1; establish clear lines of responsibility for safety, security release prevention, training and emergency response in written agreements with producers, distributors and transporters.

A regional cyanide supply contract between the cyanide producer, Cyanco Company LLC, and Newmont USA Limited governs all deliveries of cyanide to LC. Cyanco's Winnemucca production facility, which supplies the cyanide to LC, has maintained continuous certification to the Code since 2006. Article IIIA of the cyanide supply contract between Cyanco and Newmont stipulates that the Cyanco shall use an ICMI certified motor carrier for product deliveries to regional Newmont operations, including LC. As evidenced by the Bills of Lading, Cyanco has only used TransWood for cyanide deliveries to LC since operations began in 2016. No other subcontractors, distributors, or transporters have been used, and no interim storage facilities or terminals are used.

Cyanco's Winnemucca production facility has maintained continuous certification to the Code since 2006, and TransWood has been a certified transporter under the Code since June 22, 2006. Cyanco and TransWood would have been evaluated for the requirements of Standard of Practice 2.1 in their certification and recertification audits conducted since 2006, and would have been found to be compliant in each case. Therefore, LC can rely on the Code certification of the producer and the transporter to establish their compliance with Standard of Practice 2.1.

Standard of Practice 2.2: **Require that cyanide transporters implement appropriate emergency response plans and capabilities and employ adequate measures for cyanide management**

☒ **in full compliance with**

The operation is

☐ in substantial compliance with **Transport Practice 2.2**

☐ not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

The operation is in full compliance with Standard of Practice 2.2; require that cyanide transporters implement appropriate emergency response plans and capabilities and employ adequate measures for cyanide management.

A regional cyanide supply contract between the cyanide producer, Cyanco Company LLC, and Newmont USA Limited governs all deliveries of cyanide to LC. Article IIIA of the cyanide supply contract between Cyanco and Newmont stipulates that the Cyanco shall use an ICMI certified motor carrier for product deliveries to regional Newmont operations, including LC. As evidenced by the Bills of Lading, Cyanco has only used TransWood for cyanide deliveries to LC since operations began in 2016. No other transporters have been used, and no interim storage facilities or terminals are used. TransWood has been a certified transporter under the Code since June 22, 2006. TransWood has demonstrated compliance with all applicable Code Principles, Standards of Practice, and certification requirements outlined in the ICMI *Cyanide Transportation Verification Protocol*, including emergency response plans, capabilities, and measures for cyanide management.

PRINCIPLE 3 – HANDLING AND STORAGE

Protect Workers and the Environment during Cyanide Handling and Storage

Standard of Practice 3.1: **Design and construct unloading, storage and mixing facilities consistent with sound, accepted engineering practices, quality control/quality assurance procedures, spill prevention and spill containment measures.**

☒ **in full compliance with**

The operation is

☐ in substantial compliance with **Handling and Storage Practice 3.1**

☐ not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

The operation is in full compliance with Standard of Practice 3.1; design and construct unloading, storage and mixing facilities consistent with sound accepted engineering practices, quality control/quality assurance procedures, spill prevention and spill containment measures.

Facilities for unloading, storing, and mixing cyanide have been designed and constructed in accordance with cyanide producers' guidelines, applicable jurisdictional rules and sound and accepted engineering practices for these facilities. The design of the tanks, tank containment area, and the truck offload area are described in the Final Design Report and were certified by a Professional Engineer to having been built as designed in the Record of Construction. The Nevada Division of Environmental Protection issued Permit NEV 2014110 based on a review of the Final Design Report.

The nearest body of surface water to the cyanide unloading and storage area is the Johnson Springs wetland, complex located greater than one mile to the south. The waste rock storage facility lies between the CIC plant and the wetland, providing a barrier to flows to the wetlands.

The truck unloading area is underlain by a reinforced, 8--inch thick poured concrete slab that prevents seepage to the subsurface. The slab is sloped to direct any water or solution towards a low point which drains through a scupper into the greater secondary containment area provided for the cyanide storage tanks, allowing for recovery of spilled solution. The two cyanide storage tanks are installed on raised concrete platforms within the concrete secondary containment area. The design drawings and Record of Construction report show that the tank platforms provide a solid subsurface for the tanks, as opposed to a ring beam. The concrete secondary containment area surrounding the tanks is constructed of an 8--inch thick poured reinforced concrete slab that slopes to a low point and sump. The sump is equipped with a level sensor and an automatically operated pump that returns any collected solution or precipitation to Column 6 of the CIC circuit.

The cyanide storage tanks designed for outdoor use to prevent water contact, and are equipped with high-level alarms (audible and visual) and automated ordering controls to prevent overfilling. These are monitored in the control room as well as at the point of filling, and were observed to be functioning during the offload that occurred during the audit. The tanks and unloading area are located in a secure outdoor area, such that natural ventilation will prevent the build-up of hydrogen cyanide (HCN) gas, and are away from any incompatible materials. Security fencing and access controls prevent unauthorized or public access to the storage area.

Standard of Practice 3.2: **Operate unloading storage and mixing facilities using inspections, preventative maintenance and contingency plans to prevent or contain releases and control and respond to worker exposures.**

☒ **in full compliance with**

The operation is ☐ in substantial compliance with **Handling and Storage Practice 3.2**

☐ not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

The operation is in full compliance with Standard of Practice 3.2; operate unloading storage and mixing facilities using inspections, preventative maintenance and contingency plans to prevent or contain releases and control and respond to worker exposures.

Cyanide is delivered to LC as a liquid sodium cyanide solution in tanker trucks; no storage or mixing of solid cyanide occurs onsite. LC does not own or control the trucks or tanker trailers, which are onsite only for the duration of the unloading event. Once unloaded, the trucks and tanker trailers return to the Cyanco facility. No empty cyanide containers are present onsite.

The Leach Cyanide Off-Loading Standard Operating Procedure (SOP) describes the operations of valves for off-loading, including emergency shut-offs and relief valves. The SOP also provides Personal Protective Equipment (PPE) requirements and clean-up procedures.

Cyanide off-loads of liquid cyanide from the tanker trailers are conducted by the TransWood truck driver, under the watch of a LC process operator who acts as a “Safety Buddy” during the offload. The LC process operator is trained in cyanide handling and spill response and observes the entire offload event through to the secure closure of the tanker valves and cleanup of any residue should it be present.

An offload of sodium cyanide solution was observed during the audit to verify conformance with the offload procedures. The TransWood driver and the LC process operator were both interviewed and demonstrated a thorough understanding of the procedure.

PRINCIPLE 4 – OPERATIONS

Manage Cyanide Process Solutions and Waste Streams to Protect Human Health and the Environment

Standard of Practice 4.1: **Implement management and operating systems designed to protect human health and the environment including contingency planning and inspection and preventative maintenance procedures.**

The operation is

☒ **in full compliance with**

☐ in substantial compliance with

☐ not in compliance with

Operations Practice 4.1

Summarise the basis for this Finding/Deficiencies Identified:

The operation is in full compliance with Standard of Practice 4.1; implement management and operating systems designed to protect human health and the environment including contingency planning and inspection and preventative maintenance procedures.

The auditors reviewed written management and operation procedures that have been developed for cyanide facilities including unloading, storage, heap leach operations, carbon-in-column, and associated facilities. LC has also documented in Plans, procedures and the SOPs the parameters upon which the facility design was based, including contingency operations for the use of the process pond. Contingency planning has been conducted for the use of the pond for events where the flow exceeds processing capacity in the CIC, during operations in start-up, or during large storm events, including recirculation of pregnant solution to the heap leach pads, or use of the process pond for barren solution. There are no tailings or discharges associated with the operations; to detect and prevent releases, the Plans and SOPs describe monitoring of the heap leach facility and process pond leak detection systems. The concentration of cyanide in the pregnant solution pond is maintained under 50 ppm WAD cyanide for the protection of wildlife through optimizing the application of dilute cyanide in the heap leach facility, and is verified through weekly testing of WAD and free cyanide in the returning pregnant solution. The pregnant solution pond, also called the event pond, has been sized to provide sufficient storage capacity (allowing for 3-feet of freeboard) for a 100-year / 24-hour storm event, heap draindown for a maximum of 8-hours as may be required for power loss or plant shutdown, or management of excess leach when transitioning cells. A 600 kW – 750 kVA backup generator provides sufficient electrical power for the CIC plant operations in the event of a power interruption.

A review of inspection records showed that documented inspections are conducted at a frequency sufficient to verify that the cyanide facilities are functioning within design parameters, including once per shift by shift operators, and once per shift by maintenance personnel. Operator's daily inspections cover general conditions, housekeeping and safety equipment of the CIC Plant and Pond, leach pad areas, laydown yards, as well as operational parameters from across the operations. Observations of the heap leach facility include general operating conditions, and any wildlife observations. Leak detection systems are also covered in the operator inspections. These inspections are documented on checklists, including conditions which are identified as deficiency or in need of corrective action. Maintenance inspections are conducted using a checklist, and cover most aspects of the CIC Plant and the maintenance shop. Preventive Maintenance systems are used to assign and track work orders issues to address issues noted in Maintenance shift inspections.

LC has implemented a change management process that utilizes a web application to assess and risk-rate the proposed change, develop and track an implementation action plan, and evaluate the effectiveness of the change, including reviews by safety and environmental personnel. Safety and environmental personnel were involved with the two changes relevant to cyanide operations that have been evaluated since cyanide operations commenced in October 2016, according to records reviewed by the auditors. Changes to SOPs, Policies and other documented processes are made through reviews of procedures, initiated either on a two-year scheduled basis or more frequently if a need is identified.

Standard of Practice 4.2: **Introduce management and operating systems to minimise cyanide use, thereby limiting concentrations of cyanide in mill tailings.**

☒ **in full compliance with**

The operation is

☐ in substantial compliance with **Operations Practice 4.2**

☐ not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

This Standard of Practice is not applicable as LC does not operate a mill at the site.

Standard of Practice 4.3: **Implement a comprehensive water management programme to protect against unintentional releases.**

☒ **in full compliance with**

The operation is

☐ in substantial compliance with **Operations Practice 4.3**

☐ not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

The operation is in full compliance with Standard of Practice 4.3; implement a comprehensive water management program to protect against unintentional releases.

Long Canyon prepared an initial water balance that is both comprehensive and probabilistic. The water balance was prepared with GoldSim, a stochastic modelling tool. The model was run with a deterministic scenario (i.e., average precipitation and 100-year, 24-hour storm) and stochastic scenarios (i.e., 1 percent chance of occurrence in any year). The inputs are precipitation and makeup water. The outputs (or losses) are only ore uptake and evaporation, as this is a zero discharge facility. There is no run-on to the HLF or process pond due to two diversion channels. Climatic data for the model was obtained from representative offsite stations. An onsite weather station was installed in 2010; the site intends to update the water balance using data from this onsite weather stations once sufficient data has been collected.

The pregnant solution / event pond was sized to provide sufficient storage capacity for a 100-year / 24-hour storm event, heap draindown for a maximum of 8-hours as may be required for power loss or plant shutdown, or management of excess leach when transitioning cells. The pond is designed with 3-feet of freeboard, in accordance with Nevada Administrative Code 535.240. Operations of the pond system and pumps are described

in the Leach Operations Procedure and the LC Fluid Management Plan, as well as the pond design and the operational parameters for the pond, including the pond cells, the individual cells and total pond capacity, and the design freeboard. The design and operation of the leak detection systems is also described.

The Workplace Inspection Checklist and the Long Canyon CIC / Heap Leach Daily Report require operators to determine the pond level relative to its design capacity, and to verify the integrity of the diversion channels, collection systems, and pond. A selection of inspection records from October 2016 through to November 2017 were reviewed to determine compliance.

Standard of Practice 4.4: **Implement measures to protect birds, other wildlife and livestock from adverse effects of cyanide process solutions.**

☒ **in full compliance with**

The operation is

☐ in substantial compliance with **Operations Practice 4.4**

☐ not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

The operation is in full compliance with Standard of Practice 4.4; implement measures to protect birds, other wildlife and livestock from adverse effects of cyanide process solutions.

Access to the leach pad area, the pond area, and the CIC plant is prevented by an 8-foot high security fence that encompasses these areas. The lowest 4-feet of the fence has tighter mesh to reduce the intrusion of small wildlife.

In the heap leach area, access to cyanide solutions is further prevented by following operational practices and SOPs that limit ponding, including conducting daily inspections to observe and rectify any ponding that may occur. Pregnant and barren solutions are conveyed in pipelines between the plant and the HLF; there are no open waters in ditches. Cyanide is applied by drip irrigation; overspray is not applicable.

In the collection systems and pond, the pregnant solution typically contains less than 40 mg/L Weak Acid Dissociable (WAD) cyanide. Under typical operating conditions, the pond remains empty, and bird netting or other devices are not in place. This was verified by a review of weekly cyanide tests and by observing the results recorded on the Daily Reports over the 4 months preceding the audit. During this period, cyanide application rates were being adjusted to determine optimum application rates. Only one of the results showed greater than 50 mg/L WAD; the overall trend was a decrease in cyanide concentrations as application rates were adjusted downwards. Prior to this period, in February 2017 an incident associated with a 100 year storm event resulted in three bird mortalities in the process pond; cyanide concentration in pregnant solution were shown to be above 50 mg/L WAD during this event. The dead birds were observed in the pond, which contained approximately 6 million gallons of pregnant solution at the time (about 9 million gallons of available capacity remained). The event occurred at a time when LC was experiencing unusual conditions due to a 100 year storm event, requiring the emergency use of the ponds. At the same time, a new ore lift had just been placed under leach at LC and the initial pregnant solution cyanide concentrations were unexpectedly high. Therefore, the ponds contained pregnant solution with greater than 50 mg/L WAD cyanide. In this incident, a bird watch was introduced until the pond drawdown was completed. Under typical operating conditions, the pond remains empty, and the cyanide concentrations in pregnant solution remains below 40 mg/L WAD.

Standard of Practice 4.5: **Implement measures to protect fish and wildlife from direct or indirect discharges of cyanide process solutions to surface water.**

☒ **in full compliance with**

The operation is ☐ in substantial compliance with **Operations Practice 4.5**

☐ not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

The operation is in full compliance with Standard of Practice 4.5; implement a comprehensive water management program to protect against unintentional releases.

The operation does not have direct or indirect discharges to surface water. Monitoring of the nearest surface water bodies, Big Spring and Northern Spring, located over 2 miles from the operations, has not identified any detectable concentrations of WAD cyanide.

Standard of Practice 4.6: **Implement measures designed to manage seepage from cyanide facilities to protect the beneficial uses of groundwater.**

☒ **in full compliance with**

The operation is ☐ in substantial compliance with **Operations Practice 4.6**

☐ not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

The operation is in full compliance with Standard of Practice 4.6; implement measures designed to manage seepage from cyanide facilities to protect the beneficial uses of groundwater.

The LC facility has been constructed with measures to protect groundwater from seepage of process solutions and water, including the following:

- The heap leach facility is constructed on a solution collection system consisting of perforated piping within a drainage layer overlying a HDPE geomembrane liner –on a low-permeability subgrade.
- A Process Component Monitoring System (PCMS) that is constructed beneath the solution collection system, which returns any collected solution back to the CIC Plant.
- Geomembrane-lined ditch system for pipelines between the HLF and the CIC.
- A double-lined pregnant solution pond, underlain by a low-permeability subgrade.
- The pregnant solution tank, which sits on an elevated platform above the pond and within the same containment.
- The CIC Plant and cyanide storage tanks are constructed on a slab of poured reinforced concrete, with secondary containment provided by concrete stem walls.

Groundwater sampling reports from before and during operations were reviewed for the groundwater monitoring well network that surrounds the facility. All results observed were less than the detection limit of 0,01 mg/L WAD

cyanide. Seepage from the operation has not caused cyanide concentrations in groundwater to rise above levels protective of beneficial use.

The operation does not use mill tailings as underground backfill.

Standard of Practice 4.7: **Provide spill prevention or containment measures for process tanks and pipelines.**

The operation is

☒ **in full compliance with**

☐ in substantial compliance with **Operations Practice 4.7**

☐ not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

The operation is in full compliance with Standard of Practice 4.7; Provide spill prevention or containment measures for process tanks and pipelines.

Spill prevention and containment measures are provided for all cyanide unloading, storage, mixing and process solution tanks. All CIC tanks, piping, and pumps are enclosed within the CIC Plant building, which is constructed with an 8-inch poured reinforced concrete floor and concrete stem walls. The floor of the CIC building is sloped towards two collection sumps, and provides in excess of 20,350 gallons, which is 110% of the largest vessel volume in the building (the barren tank at 18,500 gallons capacity). The two 10,000 gallon cyanide tanks are located within a containment area, constructed of poured, reinforced concrete walls and floor, providing 11,000 gallons of containment. The tank containment area is sloped towards a sump. For both the CIC Plant and the cyanide storage tank area, the floor sumps are equipped with level sensors and automatic pumps that return any collected fluids to the process circuit. As the cyanide tank containment is located outdoors, it may capture precipitation, but due to the relatively small size, this can be accommodated without additional capacity. Additional, tertiary containment capacity is provided to the CIC Plant building by way of flow-through piping broaching the stem wall that flows directly to the process pond.

Other secondary containments, including lined ditches containing the pipelines and the leak detection systems, lead to the process pond from where the collected solutions can be pumped to the pregnant or barren solution tanks, and retained in the process. The plant is a zero discharge facility and there are no means to discharge to the environment. There are no areas where cyanide pipelines present a risk to surface water, and no need for special protection, as the nearest surface water is a wetland area located about 2 miles away, on the opposite side of the waste rock area which creates a hydraulic barrier for surface flows.

The design drawing and Record of Construction report indicate that all pipes, tanks and pipelines are constructed of carbon steel, HDPE, or corrugated polyethylene, all of which are compatible with cyanide and high pH conditions. This is consistent with the auditors observations during the site visit.

Standard of Practice 4.8: **Implement quality control/quality assurance procedures to confirm that cyanide facilities are constructed according to accepted engineering standards and specifications.**

☒ **in full compliance with**

The operation is ☐ in substantial compliance with **Operations Practice 4.8**

☐ not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

The operation is in full compliance with Standard of Practice 4.8; implement quality control/quality assurance procedures to confirm that cyanide facilities are constructed according to accepted engineering standards and specifications.

The Record of Construction Reports are retained electronically and in hardcopy by the operations, and provide documentation and as-built drawings of all elements of the LC Project, as completed in June 2016. The reports include the statement, signed and sealed by a Professional Engineer in the State of Nevada, that the project was constructed in general accordance with the approved design. The Record of Construction reports for LC includes Quality Assurance / Quality Control (QA/QC) records for all cyanide facilities, as recorded and reported by AMEC Foster Wheeler, who were contracted by Newfields and Big-D for these purposes. The QA/QC records include:

- Earthworks, concrete and waterstops for the foundations and stem walls for the CIC Plant and cyanide tank containment;
- Tanks and pipeline integrity tests and weld inspections; and
- Subgrades and HDPE Geomembrane liner installations and related protective layers and collection systems.

Standard of Practice 4.9: **Implement monitoring programs to evaluate the effects of cyanide use on wildlife, surface and groundwater quality.**

☒ **in full compliance with**

The operation is ☐ in substantial compliance with **Operations Practice 4.9**

☐ not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

The operation is in full compliance with Standard of Practice 4.9; implement monitoring programs to evaluate the effects of cyanide use on wildlife, surface and groundwater quality.

Section 5 of the Fluid Management System Operating Plan provides detailed instructions for the monitoring of environmental conditions, including groundwater and surface water. This Plan was developed by Newmont regional resources, and has been reviewed and approved by the Nevada Division of Environmental Protection. It includes details on how and where samples should be taken, sample preservation techniques, chain of custody procedures, shipping instructions, and cyanide species to be analyzed. iPad templates are used to capture

information relevant to sampling conditions and procedures when collecting samples. The iPads upload the data to the MonitorPro database. Records in MonitorPro were reviewed by the auditors to verify compliance with these requirements.

Monitoring is conducted at frequencies adequate to characterize the medium being monitored and to identify changes in a timely manner:

- LC conducts quarterly monitoring of the nearest surface water bodies, Big Spring and Johnson Wetlands, and of the groundwater monitoring well network consisting of 12 groundwater wells, including downgradient wells.
- Wildlife (including mortalities) observed anywhere onsite are recorded daily on the Long Canyon CIC / Heap Leach Daily Report, and are reported to the Nevada Department of Wildlife on a quarterly basis.

PRINCIPLE 5 – DECOMMISSIONING

Protect Communities and the Environment from Cyanide through Development and Implementation of Decommissioning Plans for Cyanide Facilities.

Standard of Practice 5.1: **Plan and implement procedures for effective decommissioning of cyanide facilities to protect human health, wildlife and livestock.**

☒ **in full compliance with**

The operation is

☐ in substantial compliance with **Decommissioning Practice 5.1**

☐ not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

The operation is in full compliance with Standard of Practice 5.1; plan and implement procedures for effective decommissioning of cyanide facilities to protect human health, wildlife and livestock.

The Closure Plan provides procedures for the stabilization and closure of heap leach facility, pipelines, the process pond and the CIC plant areas. This is supported by SOPs such as the Cyanide Equipment Decontamination SOP and the Cleaning Cyanide Salts SOP, which provide methods for removing cyanide residues from process equipment, including PPE requirements, safe work practices, rinsate management, and waste disposal.

The Reclamation Plan includes an implementation schedule for decommissioning activities that spans from the Life of Mine (currently year 15) to year 42. The first five years following the end of mine life would see a number of concurrent closure activities including: removal of the CIC Plant, recirculation and active evaporation of leach solutions, regrading, cover soil application, revegetation, and revegetation monitoring. Post-closure activities would occur in years 20 through 42, at which time process fluid stabilization is projected to occur. The closure schedule allows for three years of post-closure monitoring.

The Closure Plan is updated on a 3-year basis, whereas the Reclamation Plan is updated annually.

Standard of Practice 5.2: **Establish an assurance mechanism capable of fully funding cyanide related decommissioning activities.**

☒ **in full compliance with**

The operation is

☐ in substantial compliance with **Decommissioning Practice 5.2**

☐ not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

The operation is in full compliance with Standard of Practice 5.2; establish an assurance mechanism capable of fully funding cyanide related decommissioning activities.

The Reclamation Plan includes detailed cost estimates for the closure of the LC Project, including all cyanide facilities and cyanide-related closure activities. The cost estimates are prepared following a State-developed costing model of third-party decommissioning works (including all cyanide facilities) that is also used for surety purposes. The cost model uses approved unit rates and includes line items for:

- The removal of buildings and foundation, including equipment removal
- Pipe removal
- Heap detoxification and water treatment
- Construction management and support, and engineering.

A total closure cost of was estimated for 2016 (as documented in the 2017 Reclamation plan). Evidence of a bond for the amount of the 2015 closure cost estimate, as documented in the 2016 Reclamation Plan, was provided in the form of a Letter of Credit from BLM.

PRINCIPLE 6 – WORKER SAFETY

Protect Workers' Health and Safety from Exposure to Cyanide

Standard of Practice 6.1: **Identify potential cyanide exposure scenarios and take measures as necessary to eliminated, reduce and control them.**

The operation is

☒ **in full compliance with**

☐ in substantial compliance with

☐ not in compliance with

Worker Safety Practice 6.1

Summarise the basis for this Finding/Deficiencies Identified:

The operation is in full compliance with Standard of Practice 6.1; identify potential cyanide exposure scenarios and take measure as necessary to eliminate, reduce and control them.

LC has developed procedures describing how cyanide-related tasks (unloading, mixing, plant operations, entry into confined spaces and equipment decontamination prior to maintenance) should be conducted to minimize worker exposure.

These SOPs cover the safe operation of all cyanide facilities and are updated on a regular basis. The SOPs include cyanide offload, equipment maintenance, decontamination of equipment and entry into confined spaces. Verification of the written procedures included review of the specific SOPs and plans and worker interviews.

Procedures at LC require that personal protective equipment is used and also address pre-work inspections. The type of PPE required is detailed in the SOPs. Pre-work inspections are undertaken daily and are documented.

LC has implemented procedures for the review of proposed process and operational changes and modifications for potential impacts on worker health and safety, including reviews of proposed changes by safety and environmental personnel. Management of Change is undertaken according to the Newmont Management of Change Standard and is recorded on the Prospector Management of Change system. Two examples of management of change documentation were reviewed by the auditors.

LC actively solicits and considers worker input in developing and evaluating health and safety procedures. Worker can contribute to health and safety procedures through comments on field level risk assessments or safety or shift meetings.

Standard of Practice 6.2: **Operate and monitor cyanide facilities to protect worker health and safety and periodically evaluate the effectiveness of health and safety measures.**

The operation is

☒ **in full compliance with**

☐ in substantial compliance with **Worker Safety Practice 6.2**

☐ not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

The operation is in full compliance with Standard of Practice 6.2; operate and monitor cyanide facilities to protect worker health and safety and periodically evaluate the effectiveness of health and safety measures.

LC has determined the appropriate pH for limiting the evolution of HCN gas during mixing and production activities. The metallurgy department has determined a minimum pH value of 9.5 which is documented in the LC Cyanide Management Plan. At the time of the audit the pH of the process solution was 11.5. The pH is continually monitored by automatic sensors that report to a recording system called Wonderware. In addition, manual titration and pH monitoring by probe is undertaken twice per shift in the pregnant solution and barren solution. The results of the automatic sensors was reviewed on the Wonderware system and found to be compliant.

LC uses ambient and personal monitoring devices to confirm that controls are adequate to limit worker exposure to HCN gas and sodium, calcium or potassium cyanide to 10 parts per million on an instantaneous bases and 4.7 parts per million continuously over an 8-hour period as cyanide. Fixed monitors have been installed in the CIC Process plant and cyanide off-load area.

LC has identified areas and activities where workers may be exposed to cyanide in excess of 10 parts per million on an instantaneous basis and 4.7 parts per million continuously over an 8-hour period and require the use of personal protective equipment in these areas or when performing such tasks. LC has installed five Ultima X HCN Gas Detectors in appropriate areas. The monitors are set to alarm at 4.7 ppm Low Level (when lights flash amber) and 10 ppm High Level (when lights flash red and there is an audible alarm). At the low level alarm the cause must be investigated and at the high level alarm the area must be evacuated.

Hydrogen cyanide monitoring equipment is maintained, tested and calibrated as directed by the manufacturer. Records of maintenance, testing and calibration are retained for a period of at least one year.

Warning signs advising workers that cyanide is present and that suitable personal protective equipment must be worn have been placed in the relevant areas. All employees, visitors and contractors to the mine receive a mine induction and Mine Site Safety Information Handbook both the induction and the booklet includes information about cyanide and site wide rules about no smoking (other than in specific permitted places), and no food and drink in process areas and correct PPE. In addition signs are placed on the doors to the CIC plant detailing no ‘Food and Drink’ in the area.

Showers, low pressure eye wash stations and dry powder/non-acidic sodium bicarbonate fire extinguishers are located at strategic locations throughout the operation. They are maintained, inspected and tested on a regular basis.

Unloading, storage, mixing and process tanks and pipes containing cyanide are identified to alert workers of their contents. The pipes are very clearly labelled and the direction of flow is shown with an arrow.

Safety Data Sheets (SDS), first aid procedures and other additional materials on cyanide safety are in provided in the safety data sheet that is available on the Newmont's on-line SDS Programme called 3E which is located on the Intranet, the SDS is in English which is the language of the workforce. Two personnel were asked to demonstrate how to access the SDS and it was found quickly.

Procedures are in place and have been implemented to investigate and evaluate cyanide exposure incidents to determine if the operation's programs and procedures to protect worker health and safety, and to respond to cyanide exposures are adequate or in need of revision.

Standard of Practice 6.3: **Develop and implement emergency response plans and procedures to respond to worker exposure to cyanide.**

The operation is

☒ **in full compliance with**

☐ in substantial compliance with **Worker Safety Practice 6.3**

☐ not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

The operation is in full compliance with Standard of Practice 6.3; develop and implement emergency response plans and procedures to respond to worker exposure to cyanide.

The operation has water, oxygen, a resuscitator, antidote kits and a radio, telephone and alarm system readily available for use at cyanide unloading, storage and mixing locations and elsewhere in the plant.

LC inspects its first aid equipment regularly to ensure that it is available if needed and that cyanide antidotes are stored and tested as directed by the manufacturer and replaced on a schedule to ensure effectiveness in the event of an incident.

LC has developed a written emergency response plan and procedures for action to be taken should a cyanide exposure incident occur. The LC Emergency Response Plan includes the following related to responding to cyanide exposures: Mayday Procedures; Communications and Call out Process; Rapid Response System, Responsibilities, Air Ambulance Procedures, and Medical Emergencies.

LC has its own on-site capability for provision of first aid and medical assistance to workers exposed to cyanide. LC has a fully trained and equipped Emergency Response team (MERT team) comprising of first responders and EMTs (trained Emergency Medical Technicians. LC has an ambulance that responds to medical emergencies at the mine property (but is not licensed to transport patients to hospital).

LC has developed procedures exposed to cyanide to locally available qualified off-site medical facilities. The operation would use its own ambulance to attend the medical emergency and then use ambulances from either Elko or Wells to transport Northeastern Nevada Regional Hospital (NNRH).

Mock emergency drills are conducted periodically to test response procedures for cyanide exposure scenarios. Lessons learned from the drills are incorporated into response planning. Mock drills are held for the emergency response team at a regional level, so that the emergency responders from all Newmont mine sites in the region participate in them.

The operation has a formalized agreement with the local hospital Northeastern Nevada Regional Hospital stating they are aware of the potential need to treat patients for cyanide exposure.

PRINCIPLE 7 – EMERGENCY RESPONSE

Protect Communities and the Environment through the Development of Emergency Response Strategies and Capabilities

Standard of Practice 7.1: Prepare detailed emergency response plans for potential cyanide releases.

The operation is

☒ **in full compliance with**

☐ in substantial compliance with **Emergency Response Practice 7.1**

☐ not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

LC is in full compliance with Standard of Practice 7.1; prepare detailed emergency response plans for potential cyanide releases.

LC has developed an Emergency Response Plan to address accidental releases of cyanide. The actions to be taken in the event of a release are described in the Eastern Nevada Environmental Incident Response Standard Operating Procedure reference and Long Canyon Environmental Emergency Response Plan.

The Emergency Response Plan considers the potential cyanide failure scenarios appropriate for its site-specific environmental and operating circumstances.

The cyanide producer (Cyanco) and transporter (TransWood) take primary responsibility for spills of cyanide up to the point of unloading at the mine. LC would provide assistance in coordination with Cyanco in the event of an emergency as indicated in the Emergency Response Plan (ERP) under the section spills and releases.

The Emergency Response Plan describes specific response actions as appropriate for anticipated emergency situations including: Clearing site personnel and potentially affected communities from the area of exposure; Use of cyanide antidotes and first aid measures for cyanide exposure; Control of releases at their source; Containment, assessment, and mitigation; and Future prevention of releases.

Standard of Practice 7.2: Involve site personnel and stakeholders in the planning process.

The operation is

☒ **in full compliance with**

☐ in substantial compliance with **Emergency Response Practice 7.2**

☐ not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

The operation is in full compliance with Standard of Practice 7.2; involve site personnel and stakeholders in the planning process.

LC has included its workforce and stakeholders such as potentially affected communities in cyanide emergency response planning.

The worker input into emergency response planning is via comments on procedures, safety meetings, taking part in mock drills, and the MERT monthly training exercises where any suggestions made are discussed.

LC has made potentially affected communities aware of the nature of the risks associated with accidental cyanide releases, and has consulted with them directly through community representatives regarding communications and response. The use and risks associated with accidental cyanide releases are discussed with potentially affected communities through Community Breakfasts in Elko, Wells, West Wendover and Wendover, Utah.

LC has involved local response agencies and medical facilities in the cyanide emergency planning and response process. This is done through LC involvement with the Local Emergency Planning Committee (LEPC) and agreements with a local hospital and ambulance services.

LC engages in consultation and communication with stakeholders to keep the Emergency Response Plan current via the membership of mine staff on the Elko County LEPC and Community breakfasts in Elko, Wells and Wendover.

Standard of Practice 7.3: **Designate appropriate personnel and commit necessary equipment and resources for emergency response.**

☒ **in full compliance with**

The operation is

☐ in substantial compliance with **Emergency Response Practice 7.3**

☐ not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

The operation is in full compliance with Standard of Practice 7.3; designate appropriate personnel and commit necessary equipment and resources for emergency response.

LC has committed in their emergency response plans and procedures, the necessary emergency response equipment and first aid to manage cyanide incidents at the mine and to coordinate transportation to the local hospital for further treatment if necessary. The ERP describes the roles and responsibilities for the emergency response coordinators. LC has identified its MERT and emergency coordinators, and has an updated list of them including their name and contact information in the LC Emergency Contact Call Check List. The LC Cyanide Management Plan and Environmental Emergency Response Plan lists equipment available and checklists are used to inspect all equipment. Training for emergency responders is detailed in LC Cyanide Management Plan and is required by legislation in the USA. The cyanide antidotes including the oxygen are inspected monthly. Self-contained breathing apparatus (SCBAs) are tested annually. The auditors reviewed completed response equipment inspection forms to verify compliance.

LC has confirmed that the outside entities included in the ERP are aware of their involvement. LC has designated a role for offsite responders in response to cyanide emergencies from Northeastern Nevada Regional Hospital in Elko, the local ambulance and the Reach Air ambulance as well as the local fire department.

LC has a formalized agreement and are in contact with Northeastern Nevada Regional Hospital and also local ambulance services.

The LC Emergency Contact Call Check Sheet includes the Sheriff Dispatch contact number, Ambulance services, Reach Air and the hospital. Both the local fire department and ambulance service have visited the LC site prior to process operations starting in 2015. In addition these responders are members of LEPC and meet with the mine though the regular LEPC meetings.

Standard of Practice 7.4: **Develop procedures for internal and external emergency notification and reporting.**

☒ **in full compliance with**

The operation is ☐ in substantial compliance with **Emergency Response Practice 7.4**

☐ not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

LC is in full compliance with Standard of Practice 7.4; develop procedures for internal and external emergency notification and reporting.

There are no communities that would be impacted in the event of an emergency at LC. However LC have procedures for contacting media and county commissioners by the External Relations Manager.

The ERP and LC Emergency Contact Call Check Sheet includes procedures for contacting management, regulatory authorities and outside responders including Elko County Sheriff, Ambulance Services, Reach Air, NNRH, Wells Fire, Wildland Fire and Elko County Fire Protection.

Standard of Practice 7.5: **Incorporate in response plans and remediation measures monitoring elements that account for the additional hazards of using cyanide treatment chemicals.**

☒ **in full compliance with**

The operation is ☐ in substantial compliance with **Emergency Response Practice 7.5**

☐ not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

LC is in full compliance with Standard of Practice 7.5; incorporate in response plans and remediation measures monitoring elements that account for the additional hazards of using cyanide treatment chemicals.

LC has specific written remediation measures as appropriate for the likely cyanide release.

LC has written procedures to contain, recover and clean-up liquid cyanide spills. These procedures are described in the LC ERPs and Cyanide Management Plan. Procedures require that containment structures such as berms or dikes or other immediate measures will be taken to stop the release until the necessary equipment and personnel can be mobilized to clean up the release. Cyanide releases will be disposed of on the heap leach pad or as indicated by the Environmental Department. Spilled cyanide solution within the CIC buildings will be returned to the process circuit via the floor sumps. The ERP requires monitoring of the affected area after

cleaning. The ERP describes that final cyanide concentration of < 0.2 ppm WAD cyanide will be permitted in residual soil as evidence that the release has been completely cleaned up.

The Incident Response Standard Operating Procedure – Environmental describes monitoring the affected area and the ERP requires the monitoring of the affected area after cleaning. The LC Environmental ERP details the use of sodium hypochlorite for releases to ground, but clearly prohibits the use of sodium hypochlorite, ferrous sulphate or hydrogen peroxide to treat cyanide that has been released into surface water.

LC has a supplier of bottled water and if required the supplier would be requested to supply additional drinking water.

The LC ERP and Eastern Nevada Environmental Incident Response Standard Operating Procedure addresses the potential need for environmental monitoring to identify the extent and effects of a cyanide release, and includes sampling methodologies, parameters and where practical, possible sampling locations. The SOP details exactly how to accomplish this soil monitoring (e.g., grid methodology and sampling container details.

Standard of Practice 7.6: **Periodically evaluate response procedures and capabilities and revise them as needed.**

☒ **in full compliance with**

The operation is ☐ in substantial compliance with **Emergency Response Practice 7.6**

☐ not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

LC is in full compliance with Standard of Practice 7.6; periodically evaluate response procedures and capabilities and revise them as needed.

The Cyanide Management Plan states that LC reviews its ERP at least annually, and more often if required after incidents, mock drills, or audits. The current version of the ERP is dated October 2017.

Mock Drills are held for the emergency response team at a regional level, so that the Emergency responders from all Newmont mines in the region participate in them. In 2017, there were four mock drills that the MERT team participated in. These have included one where TransWood the Newmont cyanide transporter was involved in a simulation where a leak occurred from a cyanide transporter. Any lessons learned from the drills are included in the emergency response plan.

At the time of audit, the Emergency Response Plan had not required implementation due to any cyanide-related incident. However, provisions are in place to evaluate and revise the Emergency Response Plan should it require deployment. The Cyanide Management Plan states that LC reviews its ERP after incidents.

PRINCIPLE 8 – TRAINING

Train Workers and Emergency Response Personnel to Manage Cyanide in a Safe and Environmentally Protective Manner

Standard of Practice 8.1: Train workers to understand the hazards associated with cyanide use.

☒ **in full compliance with**

The operation is

☐ in substantial compliance with

☐ not in compliance with

Training Practice 8.1

Summarise the basis for this Finding/Deficiencies Identified:

LC is in full compliance with Standard of Practice 8.1; train workers to understand the hazards associated with cyanide use.

All LC staff are trained in cyanide hazard recognition as part of their Mine Safety and Health Administration (MSHA) New Hire and site specific training. Staff assigned to the plant or leach facilities, where cyanide is an integral part of the operation, are also trained on the safe use and handling of cyanide through a cyanide safety presentation and SOPs. Visitors receive an information handbook that mentions the possible presence of cyanide in ponds and facilities; however, visitors are always escorted by LC staff to ensure their safety.

Cyanide hazard recognition refresher training is periodically conducted. The Cyanide Safety Presentation is given as annual refresher training. Following the presentation all employees, contractors and visitors take a written test to ensure they have understood the information presented.

Cyanide training records are retained by LC's Health, Safety and Loss Prevention Department. The auditors cross-checked the records of individuals working at the time of the site visit and found all of their records to verify compliance.

Standard of Practice 8.2: Train appropriate personnel to operate the facility according to systems and procedures that protect human health, the community and the environment.

☒ **in full compliance with**

The operation is

☐ in substantial compliance with

☐ not in compliance with

Training Practice 8.2

Summarise the basis for this Finding/Deficiencies Identified:

The operation is in full compliance with Standard of Practice 8.2; Train appropriate personnel to operate the facility according to systems and procedures that protect human health, the community and the environment.

LC trains workers to perform their normal production tasks, including unloading, production and maintenance, with minimum risk to worker health and safety in a manner that prevents unplanned cyanide releases. All personnel in job positions that involve cyanide receive training on how to perform their assigned tasks with minimum risk to worker health and safety and in a manner that prevents unplanned cyanide releases.

The cyanide-related training elements for employees working with cyanide are covered in the CIC Process Plant Training Criteria and Leach Pad Training Criteria.

Training is provided by employees who have worked with cyanide for more than five years and are considered experienced and have effective communication skills. Appropriately qualified personal provide task training relating to cyanide management activities. Training and instruction is also included periodically at the safety meetings. Regular safety meetings include cyanide-related topics. Records from safety meetings were reviewed to verify compliance.

Employees are trained prior to working with cyanide. All new employees are required to attend the 'Site Specific Training and Cyanide Awareness Training and take the associated written test as part of the New Hire Employee Training. Each employee is required to take a competency knowledge check, involving a detailed written and oral test, prior to being signed off on an individual task. A record is maintained demonstrating the level of training the employee has received,

LC evaluates the effectiveness of cyanide training by testing and observation. The Cyanide Safety Presentation is given as annual refresher training. Following the presentation all employees, contractors and visitors take a written test to ensure they have understood the information presented.

Records of training received are retained throughout an individual's employment. LC maintains records of training for each employee throughout the entire period of their employment. The records include the names of the employee and the trainer, the date of training, the topics covered, and any test results.

The auditors reviewed training records for the Offload Buddy as well a number of the operators on shift during the audit.

Standard of Practice 8.3: **Train appropriate workers and personnel to respond to worker exposures and environmental releases of cyanide.**

☒ **in full compliance with**

The operation is ☐ in substantial compliance with **Training Practice 8.3**

☐ not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

LC is in full compliance with Standard of Practice 8.3; train appropriate workers and personnel to respond to worker exposures and environmental releases of cyanide.

Employees involved in the use and handling of cyanide, such as unloading, leach, and maintenance, are trained on the risks and proper handling techniques including decontamination and first aid procedures. These employees receive training on emergency response and first aid for cyanide release incidents. Additionally, employees working in cyanide areas participate in emergency response mock drills.

All employees working with cyanide are trained to be first responders in the event of an emergency. Training elements include training on the emergency response plan, first aid procedures and locations of emergency response equipment. This is part of the annual refresher training which is given to all employees who may come into contact with cyanide. In addition to this the Mine Emergency Response Team (MERT) receives additional

training on the procedures and guidelines outlined in the ERP including the response to a cyanide spill, release, or emergency.

Representatives from LC's Emergency Response team attend meetings at Elko County Local Emergency Planning Committee (LEPC). This enables the operation to make off-site Emergency Responders, familiar with those elements of the Emergency Response Plan related to cyanide.

LC employees are trained annually on hazards associated with cyanide, including responses to cyanide exposures and releases.

Mock Drills are held for the emergency response team at a regional level so that the Emergency responders from all Newmont mine sites in the region participate in them. These have included one where TransWood the Newmont cyanide transporter was involved in a simulation where a leak occurred from a cyanide transporter. Any lessons learned from the drills are included in the emergency response plan.

The MERT team have been involved in both regional drills and on-site drills which have involved both cyanide spills and cyanide exposure.

Training records are retained documenting the employee training on cyanide use and safety.

PRINCIPLE 9 – DIALOGUE

Engage in Public Consultation and Disclosure

Standard of Practice 9.1: Provide stakeholders the opportunity to communicate issues of concern.

☒ **in full compliance with**

The operation is

☐ in substantial compliance with **Dialogue Practice 9.1**

☐ not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

LC is in full compliance with Standard of Practice 9.1; provide stakeholders with the opportunity to communicate issues of concern.

Stakeholders and the public may contact LC via advertised phone numbers and e-mail addresses or via Facebook. LC hosts community breakfasts, mine tours, and attends local events. Public meetings are held when required for new or renewing permits. LC maintains an issues register to ensure stakeholder and public concerns are tracked and responded to.

Standard of Practice 9.2: Initiate dialogue describing cyanide management procedures and responsively address identified concerns.

☒ **in full compliance with**

The operation is

☐ in substantial compliance with **Dialogue Practice 9.2**

☐ not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

The operation is in full compliance with Standard of Practice 9.2; initiate dialogue describing cyanide management procedures and responsively address identified concerns.

LC hosts community breakfasts, mine tours, and open houses where cyanide-related information is disseminated orally and via handouts and presentations. Public meetings are held when required for new or renewing permits. LC also distributes cyanide-related information via its series of articles “Newmont Notes” in the local newspapers and via the “Beyond the Mine” website.

Standard of Practice 9.3: Make appropriate operational and environmental information regarding cyanide available to stakeholders.

☒ **in full compliance with**

The operation is

☐ in substantial compliance with **Dialogue Practice 9.3**

☐ not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

LC is in full compliance with Standard of Practice 9.3; make appropriate operational and environmental information regarding cyanide available to stakeholders.

LC makes information publically available on cyanide releases or exposure incidents primarily via the website “Beyond the Mine”.

At the time of writing the 2017 data had not been uploaded and in 2016 Long Canyon was not included as they were only in production for two months. This data is also publically available through MSHA and Nevada Division of Environmental Protection.

3.0 CLOSURE

We trust the information contained in this report is sufficient for your present needs. Should you have any additional questions regarding the project, please do not hesitate to contact the undersigned.

Golder Associates Ltd.

Sophie Wheeler
Auditor

Evan Jones
Lead Auditor, Mining Technical Specialist

SW/EJ/nnv

https://golderassociates.sharepoint.com/sites/1785052/shared documents/deliverables/issued to client/1785052-002-r-rev0/1785052-002-r-rev0-long conyon summary audit report 1may_18.docx

golder.com