POLYMET
MINING

NorthMet Project

Rock and Overburden Management Plan

Version 6

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This document was prepared for Poly Met Mining Inc. by Barr Engineering Co.

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Acronyms, Abbreviations and Units

Acronym, Abbreviation or Unit	Stands For
%S	Percent sulfur
ARD	Acid Rock Drainage
ASTM	American Society for Testing and Materials
AWMP	Adaptive Water Management Plan
cm/sec	centimeters per second
CQA	Construction Quality Assurance
EIS	Environmental Impact Statement
FTB	Flotation Tailings Basin
gal/acre/day	gallons per acre per day
GCS	groundwater containment system
gpm	gallons per minute
GPS	global positioning system
LLDPE	Linear Low Density Polyethylene
LTVSMC	LTV Steel Mining Company
Max	Maximum
MCY	million cubic yards
MDNR	Minnesota Department of Natural Resources
mil	measurement of liner thickness; a mil is a thousandth of an inch
MPCA	Minnesota Pollution Control Agency
N/A	not applicable
OSLA	Overburden Storage and Laydown Area
OSP	Ore Surge Pile
psi	pounds per square inch

Acronym, Abbreviation or Unit	Stands For
PTM	Permit to Mine
QC	quality control
ROMP	Rock and Overburden Management Plan
RTH	Rail Transfer Hopper
SDS	State Disposal System
SPK	stockpile
TBD	to be determined
UV	ultraviolet
WWTF	Mine Site Waste Water Treatment Facility

1.0 Introduction

This document describes the Rock and Overburden Management Plan for the NorthMet Project (Project) and includes the presentation of the Block Model of rock in the mine pits, classification of waste rock and overburden based on the waste characterization study, stockpile design details, construction uses of waste rock and overburden, operating plans, reporting requirements, and adaptive management approaches. Incremental and final reclamation activities associated with stockpiles are also included. Information from this report will become part of the Minnesota Department of Natural Resources (MDNR) Permit to Mine (PTM) application and Minnesota Pollution Control Agency (MPCA) State Disposal System (SDS) Permit application and is summarized in the NorthMet Mine Plan (Reference (1)).

As developed in Section 4.2 of the Waste Characterization Data Package (Reference (2)), the overall plan for management of waste rock is to classify rock by its reactivity and place it in one of three stockpiles based on that classification. The lowest reactivity stockpile, Category 1, is a permanent stockpile, although some of the material will be used for select construction applications at the Mine Site or placed directly in the East Pit after mining ceases in the pit. The two higher reactivity stockpiles, Category 2/3 and Category 4, are temporary stockpiles, and waste rock from these stockpiles will be relocated to the East and Central Pits after mining ceases in each pit. Management of waste rock is described in Section 2.1.

As developed in Section 3.2 of Reference (2), the overall plan for management of overburden is to place potentially reactive saturated mineral overburden, hereinafter called Saturated Overburden, in one of two temporary stockpiles, Category 2/3 and Category 4, or to use it in MDNR-approved applications, and to use non-reactive unsaturated mineral overburden, hereinafter called Unsaturated Overburden, for construction and reclamation at the Mine Site. Organic Overburden, hereinafter called Peat, will also be used for reclamation at the Mine Site. Management of overburden is described in Section 2.2.

The Project is described in the Project Description (Reference (3)). Detailed reclamation plans for the waste rock stockpiles are described in this document. The overall reclamation plan is described in the NorthMet Project Reclamation Plan (Reference (7)). The Management Plans will evolve through the environmental review, permitting, operating, reclamation, and long-term closure phases of the project.

1.1 Objective and Overview

The objective of the Rock and Overburden Management Plan (ROMP) is to provide stable and safe storage of the mine's waste rock and overburden in a manner that results in compliance with safety and environmental regulations.

The Mine Site layouts are presented for Mine Years 1, 2, 11, and 20 as Large Figure 1 through Large Figure 4. Mine Years 1 and 2 are provided because they are the first two years of mining. Mine Year 11 is included because there is a major change in operations – mining in the East Pit is completed, mining in the Central Pit has begun, and the temporary waste rock stockpiles have reached their maximum footprints. Mine Year 20 represents the end of mining, with pits and the permanent waste rock stockpile at their maximum extents and the material in the temporary waste rock stockpiles having been relocated to the East and Central Pits. Cross-sections of the pits are shown on Large Figure 5, and cross-sections of the stockpiles are shown on Large Figure 6 and Large Figure 7.

Some of the information provided in this document will be submitted annually to fulfill the PTM annual reporting requirements, including documentation on the mining and reclamation activities completed during the past year and the mining and reclamation activities planned for the upcoming year.

1.2 Outline

The outline of this document is:

Section 1.0 Introduction, objective and overview, and geology and Block Model

Section 2.0 Description of the design of systems to manage waste rock and overburden including waste characterization, waste classification, and construction uses

Section 3.0 Description of the outcomes of the design

Section 4.0 Description of the operational plans associated with rock and overburden management

Section 5.0 Description of systems to monitor the water quantity and quality from the stockpiles, the amount of material in the stockpiles, and the footprint of the stockpiles

Section 6.0 Description of annual reporting requirements including comparison to plan, waste characterization update, and compliance report

Section 7.0 Description of the reclamation plan for the stockpiles including incremental reclamation, final reclamation, long-term closure activities and the Contingency Reclamation Estimates (assumes closure in the upcoming year) for Mine Year 0 and 1

Because this document is intended to evolve through the environmental review, permitting (SDS, Water Appropriations and PTM), operating, reclamation, and long-term closure phases of the Project, some headings are included as placeholders and are so identified. It will be reviewed and updated as necessary in conjunction with changes that occur in facility operating and maintenance methods or requirements. A Revision History is included at the end of the document.

1.3 Geology and Block Model

The geology of the NorthMet Deposit is described in Section 2 of Reference (3).

The Block Model is a mathematical representation of the NorthMet Deposit and is used to develop a mine design and mining schedule. The schedule drives the required capacity for stockpiles. The development of the Block Model is described in Attachment A.

2.0 Mine Waste Management System Design

Mine waste that will be excavated in the process of exposing the ore includes waste rock and overburden. Management of these mine wastes includes estimating the amount of each type of material to be excavated, evaluating the potential construction uses for each type of material, and designing storage areas for the materials.

2.1 Waste Rock

Waste rock will be excavated and hauled by truck to waste rock stockpiles or to the East and Central Pits for backfilling, as described in Reference (1). Waste rock will be categorized based on the geochemical properties of the waste rock.

2.1.1 Rock Characterization and Classification

Based on work described in Section 4 of Reference (2), waste rock has been divided into four categories according to its sulfur content, in ascending order of reactivity. These waste rock categories are summarized in Table 2-1 and described in more detail below.

Table 2-1 Summary of Waste Rock Properties

Waste Rock Categorization	Sulfur Content (%S)(1)	Approximate % of Waste Rock Mass	Applications(3)
Category 1	%S ≤ 0.12	70%	Construction and East Pit Backfill
Category 2	0.12 < %S ≤ 0.31	24%	East Pit Backfill
Category 3	0.31 < %S ≤ 0.6	3%	East Pit Backfill
Category 4(2)	0.6 < %S	3%	East Pit Backfill

(1) In general, the higher the rock's sulfur content, the higher its potential for generating Acid Rock Drainage (ARD) or leaching heavy metals.
(2) Includes all Virginia formation rock
(3) Applications include uses of the material other than stockpile storage.

The decision on where to haul the waste rock will depend on the rock's waste category, which will be determined through a sampling and analysis program approved by the MDNR, as discussed in Section 4.0.

As shown in Table 2-2, during Mine Years 1 through 11, Category 2, 3, and 4 waste rock will be placed on the temporary Category 2/3 or Category 4 Waste Rock Stockpiles (Large Figure 1 through Large Figure 3). Beginning in Mine Year 11, after mining of the East Pit is complete, Category 2, 3, and 4 waste rock will be placed directly in the East Pit. Category 2, 3, and 4 waste rock will also be used to backfill the Central Pit, once mining ceases in that pit. The material in the temporary Category 2/3 and Category 4 Waste Rock Stockpiles will be relocated to the combined East and Central Pit, after mining ceases in each pit. In addition, approximately 49 million tons of Category 1 waste rock mined after Mine

Year 11 will be placed in the East Pit. This will result in backfilling the East Pit, which includes the Central Pit, with approximately 45% of the total waste rock mined. See Section 7.1.2.1 for more details on East Pit backfilling.

Stockpiles will be designed to comply with Minnesota Rules, parts 6132.2200 and 6132.2400. When at their maximum extent, each stockpile is estimated to have the approximate area, height, volume, and elevation shown in Table 2-3.

Table 2-2 Waste Rock Placement

Mine Year	Category 1 Waste Rock Stockpile (tons)	Category 2/3 Waste Rock Stockpile (tons)	Category 4 Waste Rock Stockpile (tons)	East Pit(1) (tons)	Total Rock Moved(1) (tons)
0	0	0	0	0	0
1	18,707,500	5,238,800	1,489,200	0	25,435,500
2	15,016,700	4,432,900	762,500	0	20,212,100
3	16,139,000	4,297,100	1,127,700	0	21,563,800
4	12,796,600	3,655,600	827,500	0	17,279,700
5	11,741,300	2,415,000	441,900	0	14,598,200
6	16,842,200	4,349,000	665,600	0	21,856,800
7	10,405,000	2,566,000	549,000	0	13,520,000
8	16,939,800	4,332,200	110,600	0	21,382,600
9	12,556,200	4,660,200	133,500	0	17,349,900
10	12,974,200	4,070,500	76,800	0	17,121,500
11	10,180,400	4,003,900	22,400	6,206,800	20,413,500
12	10,773,100	0	0	10,574,200	21,347,300
13	2,850,000	0	0	16,772,200	19,622,200
14	0	0	0	17,917,200	17,917,200
15	0	0	0	16,689,400	16,689,400
16	0	0	0	14,838,800	14,838,800
17	0	0	0	12,695,000	12,695,000
18	0	0	0	14,581,100	14,581,100
19	0	0	0	15,788,600	15,788,600
20	0	0	0	14,128,000	14,128,000
Total	167,922,000(2)	44,021,200	6,206,700	140,191,300	358,341,200(1)
% Total	54.5%	14.3%	2.0%		116.3%(1)

(1) The total rock listed includes movement of rock from the temporary Category 2/3 and Category 4 Waste Rock Stockpiles to the East Pit and the movement of rock from the West and Central Pit to the East Pit. There will be approximately 308 million tons of waste rock, with about 50 million tons being double-handled for disposal in the East Pit.

(2) A portion of the Category 1 waste rock may be used for MDNR-approved on-site construction. The balance will be placed in the Category 1 Waste Rock Stockpile.

Table 2-3 Maximum Stockpile Dimensions – Approximate

Stockpile	Mine Year of Maximum Footprint	Maximum Footprint (acres)	Volume (tons)		Height (feet)		Maximum Elevation (feet above sea level)
			Planned[1]	Maximum Capacity	Planned[1]	Maximum Capacity	
Category 1 (Permanent)	6/21[2]	508/526[2]	168.0M	178.0M	240	280	1880
Category 2/3 (Temporary)	6	180	44.0M	60.6M	160	200	1770
Category 4 (Temporary)	3	57	6.21M	15.0M	80	180	1790
Ore Surge Pile (Temporary)	N/A[3]	31	2.50M	4.37M	40	120	1690

(1) The planned volume of the stockpile is the volume of waste rock in the current Mine Plan. The maximum capacity reflects the full capacity of the stockpile based on its planned footprint. Maximum capacities of the temporary stockpiles and planned capacity of the permanent stockpile were used for impact evaluations.
(2) The Category 1 Waste Rock Stockpile has a maximum footprint of 508 acres while active. It will reach this size by Mine Year 6. The stockpile will be re-graded as part of reclamation with a final footprint of 526 acres in Mine Year 21.
(3) The OSP is a surge pile that will have ore moving in and out as needed to meet mine and plant conditions.

2.1.2 Permanent Stockpile – Category 1 Waste Rock Stockpile

The majority of the Category 1 waste rock will be placed in the permanent Category 1 Waste Rock Stockpile, which is the only permanent stockpile. Some Category 1 waste rock will be used to backfill the East or Central Pit. Located north and west of the West Pit, the Category 1 Waste Rock Stockpile, at its final configuration (Mine Year 21), will contain approximately 168 million tons of waste rock, cover approximately 526 acres, and be approximately 240 feet high.

The Category 1 Waste Rock Stockpile contains rock that is not expected to generate acid rock drainage (ARD), but may leach heavy metals; therefore it will be constructed differently than the temporary waste rock stockpiles that will contain waste rock with potential to generate ARD. Minnesota Rule, part 6132.2200, subpart 2, item B(2) mandates collection of water that drains from mine waste; therefore a groundwater containment system will be constructed in stages around the stockpile to collect Category 1 Waste Rock Stockpile drainage and convey it to the Mine Site Waste Water Treatment Facility (WWTF) for treatment. This groundwater containment system is being developed in lieu of a liner system under the stockpile. Sections 2.1.2.2 and 2.1.2.3 describe the Category 1 Waste Rock Stockpile Groundwater Containment System.

Details on reclamation of the Category 1 Waste Rock Stockpile are discussed in Section 7.1.1 for incremental reclamation, Section 7.2.1 for final closure, and Section 7.3.1 for long-term closure.

2.1.2.1 Stockpile Design

The Category 1 Waste Rock Stockpile will be the only permanent stockpile and has been designed to comply with Minnesota Rules, part 6132.2400 to minimize hydrologic impacts, be structurally sound, control erosion, promote progressive reclamation, and enhance the survival and propagation of vegetation. In order to meet these requirements, the stockpile has been designed with a maximum lift height of 40 feet, final bench width of 30 feet, initial slopes between benches at the angle of repose of the waste rock, and final reclamation slopes between benches of 3.75 (horizontal) to 1 (vertical).

In preparation for building the stockpile, the site will be cleared, and geotechnically unsuitable soils will be removed from around the perimeter to insure the long-term stability of the stockpile and the adjacent groundwater containment system. For more details on the geotechnical design and modeling to support the design, see Reference (4). Select permit design drawings of the Category 1 Waste Rock Stockpile are included in Attachment B at this time; design drawings of the temporary waste rock stockpiles and the Ore Surge Pile (OSP) will be included during permitting.

Surface water management on active portions of the stockpile has been designed to minimize erosion on the stockpile surface. The benches and top surfaces of the stockpile will be backsloped away from the crests to minimize the potential for breakout of ponded water from eroding the outer slopes. In addition, crest berms (Detail 3, Drawing SPK-033 in Attachment B, to be provided in permitting) will be constructed along the operational crest perimeters to provide further assurance that surface runoff from active areas will not overflow to the reclaimed areas along the lower slopes. Outslope drainage will be managed in part by using channels constructed on the inboard side of the stockpile ramps, as illustrated on Detail 4 on Drawing SPK-028 of Attachment B. Drainage and any surface runoff from active portions of the stockpile will be collected in the groundwater containment system along the base of the stockpile.

2.1.2.2 Groundwater Containment System Design

A groundwater containment system will be constructed to capture drainage and surface runoff from the Category 1 Waste Rock Stockpile. The Category 1 Waste Rock Stockpile Groundwater Containment System will provide the ability to collect and treat the drainage from the Category 1 Waste Rock Stockpile.

The Category 1 Waste Rock Stockpile Groundwater Containment System will consist of a cutoff wall (a low permeability compacted soil hydraulic barrier) combined with a drainage collection system around the perimeter of the stockpile near the stockpile toe. The final configuration of the containment system will completely encircle the stockpile as shown on Figure 2-1. Attachment C contains the Permit Support Drawings for the Category 1 Waste Rock Stockpile Groundwater Containment System for reference in conjunction with the following discussion of the containment system design. The design will meet the applicable requirements of Minnesota Rules, part 6132.2200, subpart 2, items B and C. During operations, the water collected by the groundwater containment system will be treated at the WWTF and pumped to the FTB or to the East Pit to flood the pit more rapidly. During reclamation and long-term closure, this water will be treated at the WWTF and pumped to the West Pit or discharged to a small watercourse that flows into the Partridge River, as described in Section 7.0.

Groundwater containment systems are commonly used at facilities where there is a need to manage groundwater flow, such as landfills, tailings basins, and paper sludge disposal facilities. The combined use of a cutoff wall and a groundwater collection system is acknowledged by academic, governmental, and industry authorities and by construction markets, as detailed in Attachment D.

The containment system will collect stockpile drainage and draw down the water table on the stockpile side of the cutoff wall, thereby maintaining an inward gradient along the cutoff wall and eliminating the potential for stockpile drainage passing through the cutoff wall (hydraulic barrier) (i.e., leakage through the cutoff wall will be inward into the containment system). Figure 2-2 shows a conceptual cross-section of the Category 1 Waste Rock Stockpile Containment System. The design of the containment system is shown in Attachment C, including typical sections during operations on Drawing GCS-010.

A groundwater flow model was developed to assess the ability of the proposed groundwater containment system to collect groundwater from beneath the Category 1 Waste Rock Stockpile and estimate the average groundwater flow rate to the collection system. See Attachment E for a description of this modeling.

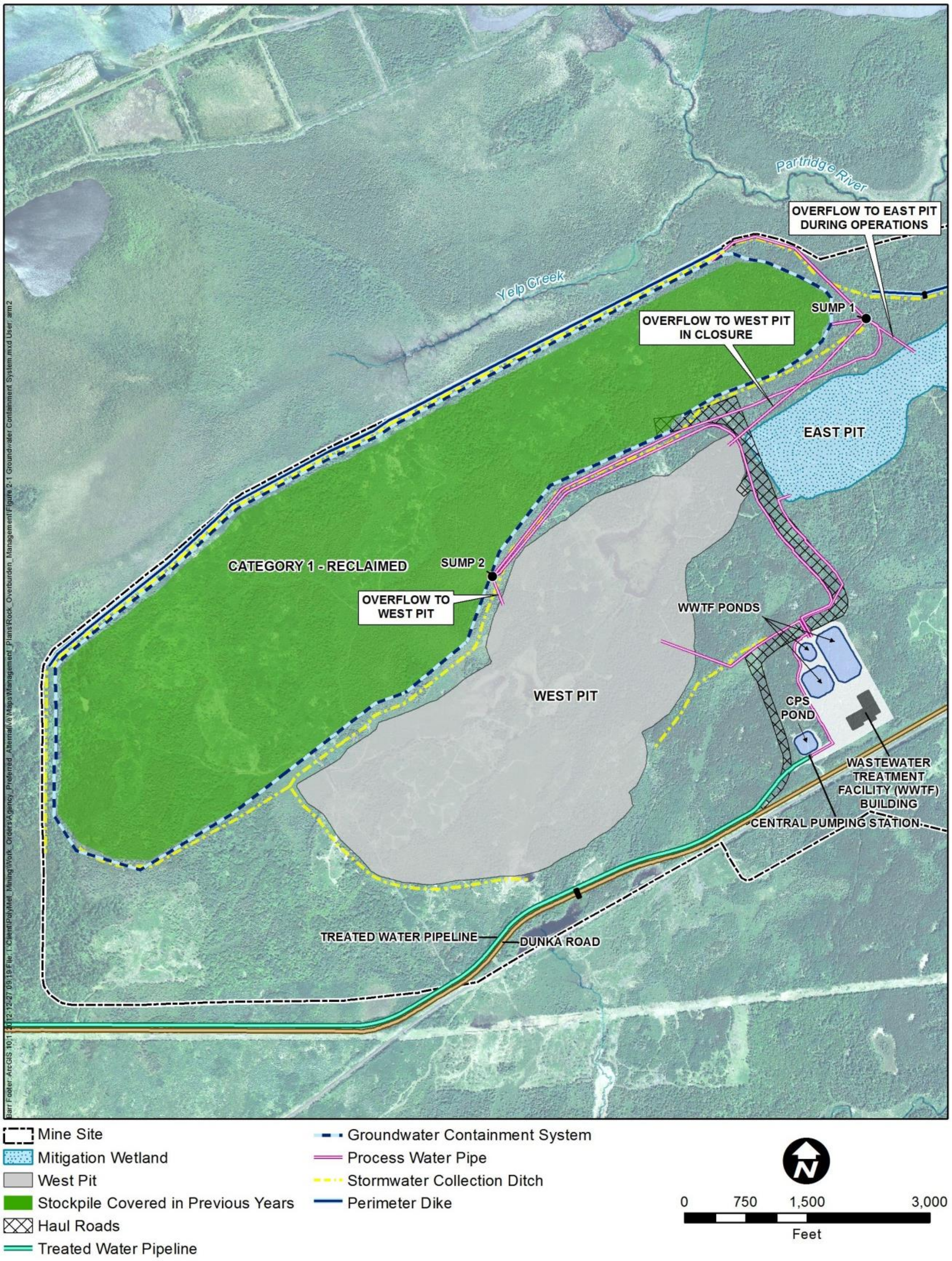

Figure 2-1 Category 1 Waste Rock Groundwater Containment System

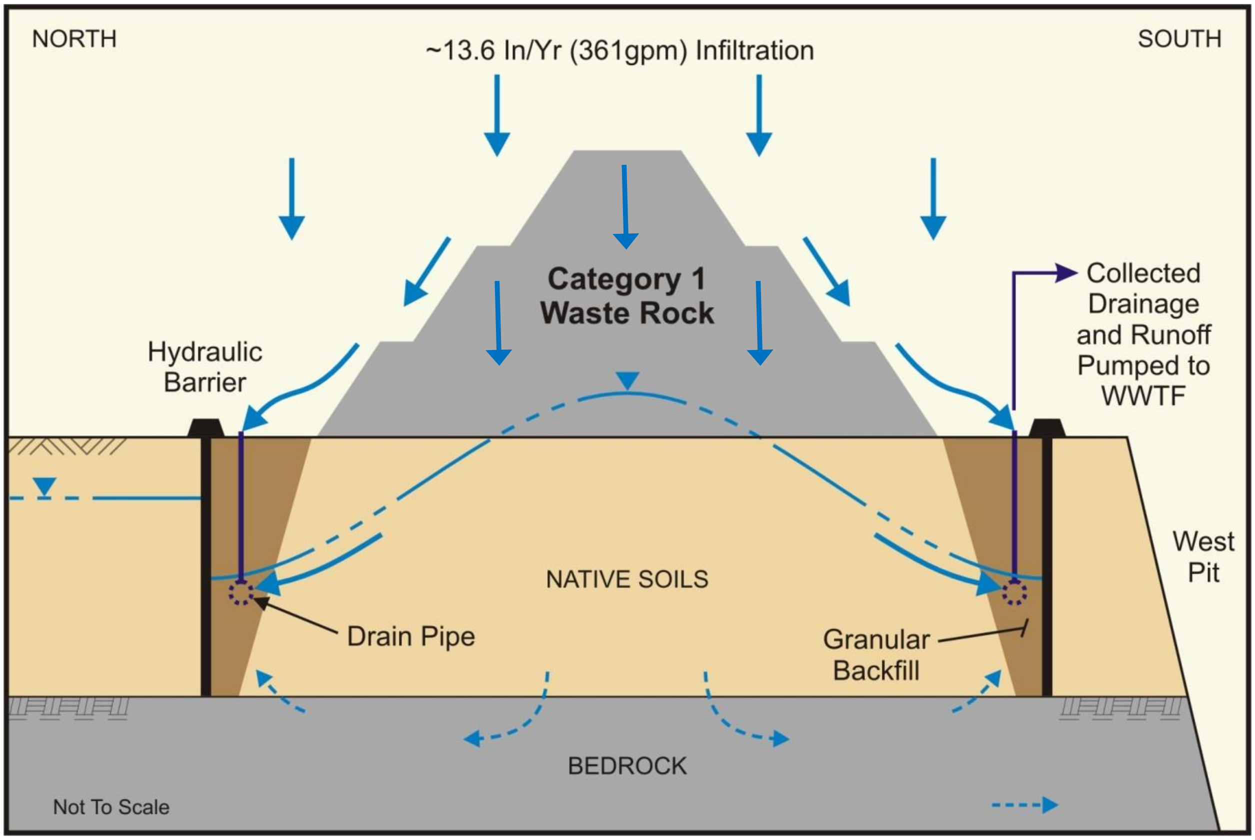

Figure 2-2 Conceptual Representation of Category 1 Waste Rock Stockpile Containment System – Operating Conditions Cross-Section

Groundwater flow modeling indicates that stockpile drainage recharging groundwater beneath the Category 1 Waste Rock Stockpile has the potential to flow within the bedrock prior to reaching the containment system. Groundwater flow within the bedrock is primarily through fractures or other secondary porosity features, as the bedrock has a low primary hydraulic conductivity. At the scale of the model, the fractures are assumed to be sufficiently interconnected that the fractured rock behaves similar to a porous medium. In order for the containment system to capture groundwater from the bedrock, a hydraulic connection between the drainage collection system and the bedrock must be established, as described in Section 2.1.2.3.

The groundwater containment system will be constructed in stages from Mine Year 0 to Mine Year 5 as shown on Drawings GCS-003 through GCS-007 of Attachment C. The Mine Year 5 configuration of the containment system will completely contain the stockpile, capturing drainage from the stockpile in its entirety.

2.1.2.3 Groundwater Containment System Configuration and Operation

The groundwater containment system will consist of a cutoff wall and a drainage collection system. The cutoff wall, with a soil hydraulic conductivity of no more than $1x10^{-5}$ cm/sec, will be constructed by excavating a trench near the toe of the stockpile to bedrock and backfilling the trench with a suitable compacted soil material (compacted natural silty clay soil or bentonite amended soil) or by placing a geosynthetic barrier in the trench. Any of these barrier systems will serve the intended function; the type to be installed will be decided based on soil availability, overall cost, and timing/duration of construction at that point in time (i.e., spring, summer, fall) when construction services are procured and initiated.

The drainage collection system will consist of a combination of pipes and ditches. This includes a slotted or perforated horizontal drain pipe surrounded by aggregate within a trench excavated to bedrock and backfilled with free-draining granular material. In order to establish a hydraulic connection between the collection drain and the bedrock, the elevation of the horizontal drain pipe must be low enough to ensure an upward vertical hydraulic gradient between the drain pipe and the bedrock. The existing low permeability soils below the drain pipe will be excavated down to bedrock and backfilled with a high permeability granular material. This should establish the hydraulic connection between the containment system and bedrock along most of the west, north and east sides of the stockpile where it is estimated that the water level will be above the elevation of the drain pipe. However, along the south side of the stockpile, the water level is likely to be below the drain pipe elevation. Some of the stockpile drainage entering bedrock and flowing south will not be captured by the containment system but will instead flow into the West Pit.

Along the west, north, and east sides of the stockpile, there may be localized areas where the drain pipe cannot be installed at an elevation low enough to ensure that groundwater will not flow beneath the cutoff wall. PolyMet assumed that water collection performance monitoring points will be defined in SDS permitting to confirm (via monitoring differential hydraulic head) whether or not post-construction seepage loss is occurring beneath the cutoff wall. If monitoring confirms that seepage losses are occurring to an extent potentially detrimental to water quality, then groundwater recovery wells can be installed to supplement the containment system.

Stockpile drainage collected in the horizontal drain pipe will flow by gravity to a low point near the northeast corner of the stockpile. From the northeast corner of the stockpile, a non-perforated pipe will convey the flow to a collection sump where it will be pumped to the WWTF. As the stockpile development progresses to the west, an additional section of the containment system will collect and convey drainage from the southwest corner of the stockpile by gravity flow to a collection sump where it will be pumped to the WWTF. The collection sumps will have emergency overflows to the East or West Pits.

In addition to the drainage collection system around the stockpile, a process water ditch will be incrementally built along the base of the stockpile as the stockpile is built. Stockpile process water (water originating from surficial seeps and runoff) will be collected and managed in the same manner as described for stockpile drainage (i.e., pumped to the WWTF). To accomplish this, the horizontal drain pipe will have vertical risers extending upward into the process water ditch. The portion of the risers above ground will be slotted or perforated and encapsulated in aggregate to allow stockpile process water originating from surficial seeps and runoff collected in the process water ditch to drain through the risers into the horizontal drain pipe, while excluding soil particles of a size that could clog or otherwise be difficult to clean from the pipe. These risers will also function as access points for cleanout of the horizontal pipe. The correct specification of the aggregate and vertical riser slot size in combination with the ability to access the horizontal pipe to implement periodic preventive cleaning will minimize the risk of clogging the drain pipe.

Shortly after construction and before vegetative cover is fully established, these systems can occasionally fill in with sediments. Multiple clean-out access points will be provided to accommodate equipment needed to prevent and/or remedy clogs if they occur. Periodic maintenance will consist of inspection via video camera of the drain pipe to make sure it is not blocked by sediments or collapsed. If sediments are observed, they will be cleaned out by flushing through the vertical risers. If collapse is observed, the collapsed section will be repaired. The periodic inspections to evaluate the need for maintenance will be every 5 years unless monitoring of the amount of water collected by the containment system indicates there has been an unusual change in flow not attributed to weather that could be caused by collapse or damage to the containment system. Over the long-term, once a dense vegetative cover is established, the availability of sand, silt and clay size particles to erode into the system is substantially reduced, as are the potential for clogging and the need for occasional pipe cleaning.

Reclamation of the groundwater containment system, including the process water ditch, is described in Section 7.1.2.

As shown in Table 2-4, the groundwater model simulations indicate that the containment system is capable of capturing 91% to greater than 99% of the drainage from the Category 1 Waste Rock Stockpile over the life of the mine and during long-term closure. The majority of the remaining drainage eventually flows to the mine pits. A small percentage, less than 1% to 2% (<0.01-6 gpm) during operations and less than 1% (<0.01 gpm) during reclamation and long-term closure, is not captured in the containment system or the mine pits and is estimated to flow off site.

The groundwater modeling simulations show that the majority of the particles not captured by the Category 1 Waste Rock Stockpile Groundwater Containment System or the pits follow deep and long (over 1,500 years) bedrock flow paths to the south, southeast, and east. These potential uncaptured flows are not significant due to the relatively small volumes of groundwater flow that these flow paths represent and the extremely long travel time relative to the water quality modeling period of 200 years. However, these potential flows from the Category 1 Waste Rock Stockpile to bedrock south, southeast, and east of the West Pit, along with outflow from the West Pit, are included in the Mine Site water quality model to determine potential impacts from this groundwater to downgradient surface water locations.

Table 2-4 Category 1 Waste Rock Stockpile Drainage Modeling Results

Particle Starting Mine Year	Capture Location	% Capture	Representative Flow Rate (gpm)
Mine Year 1	Containment System	>99%%	140 gpm
	West Pit	0%	0 gpm
	East Pit	<1%	<1 gpm
	Uncaptured	<1%	<0.1 gpm
Mine Year 10	Containment System	91%	329 gpm
	West Pit	6%	21 gpm
	East Pit	2%	6 gpm
	Uncaptured	2%	6 gpm
Mine Year 20	Containment System	95%	4 gpm
	West Pit	4%	<1 gpm
	East Pit	<1%	<0.01 gpm
	Uncaptured	<1%	<0.01 gpm
Mine Year 30	Containment System	95%	4 gpm
	West Pit	5%	<1 gpm
	East Pit	<1%	<0.01 gpm
	Uncaptured	<1%	<0.01 gpm
Mine Year 40	Containment System	95%	4 gpm
	West Pit	5%	<1 gpm
	East Pit	<1%	<0.01 gpm
	Uncaptured	<1%	<0.01 gpm
Long-Term Closure (Steady State)	Containment System	95%	4 gpm
	West Pit	5%	<1 gpm
	East Pit	<1%	<0.01 gpm
	Uncaptured	<1%	<0.01 gpm

When the stockpile is uncovered, the model is estimating that there is some potential for a very small amount of stockpile drainage (0.2 gpm) to flow underneath the containment system and discharge to the adjacent wetlands in areas along the northeast and northwestern sides of the stockpile. These areas will be investigated prior to the construction of the corresponding segment of the containment system. If field conditions, particularly depth to bedrock, are similar to modeling assumptions, the design of the containment system may be modified to account for capture at lower elevations or to include groundwater extraction wells that will collect water from a greater depth than the containment system is currently designed and modeled to collect water.

2.1.2.4 Construction Use of Category 1 Waste Rock

A significant amount of construction material will be required in the first few years of operation to develop the Mine Site. Construction material requirements change over time, but material continues to be needed throughout the life of the mine for new and expanded haul roads, stockpile foundations and liners, and ancillary infrastructure. Category 1 waste rock will be used as a construction material, depending on the application, the expected effect on surface and groundwater quality, and availability of the material relative to when and where it is needed, as approved by the MDNR. Category 1 waste rock may also be crushed and screened for use in Mine Site construction, as approved by the MDNR.

If the use of Category 1 waste rock for construction purposes is not approved by MDNR, rock will be obtained from a state-owned waste rock stockpile (Stockpile 2012) from LTVSMC Area 3 and/or 2 located approximately 5 miles west of the Mine Site along Dunka Road or from the inactive LTV Steel Mining Company (LTVSMC) Area 5 (Large Figure 8) to the east of the Tailings Basin. Table 2-5 lists construction applications that will require rock, which could either be Category 1 waste rock or other rock, as approved by the MDNR.

Table 2-5 Construction Applications Requiring Rock

Application	Water Quality Rationale	Estimated Cubic Yards(1)
Category 1 Waste Rock Stockpile Perimeter	<u>Operations:</u> Water contacting the rock will be within the groundwater containment system and routed to the WWTF. <u>Long-Term Closure:</u> Water contacting the rock will be within the groundwater containment system and routed to treatment.	TBD
Temporary Stockpile Foundations (Category 2/3 and 4 and OSP)	<u>Operations:</u> Minimal water will contact the rock because it will be below a geomembrane liner. <u>Long-Term Closure:</u> Some of this material will be removed during reclamation of the temporary stockpile foundations. The remaining material will be reclaimed with a soil cover, with runoff directed off-site.	TBD
Temporary Stockpile Drainage Layer (Category 2/3 and 4 and OSP)	<u>Operations:</u> Water contacting this rock will be collected on the geomembrane liner. <u>Long-Term Closure:</u> This material is located above the geomembrane liner and will be removed in reclamation.	TBD

Application	Water Quality Rationale	Estimated Cubic Yards(1)
Groundwater Containment System Material	Operations: Water contacting this rock will be within the groundwater containment system and routed to the WWTF. Long-Term Closure: Water contacting the rock will be within the groundwater containment system and routed to treatment.	TBD
Ramps and Roads in Pit	Operations: Water contacting this rock will be pit water, which is collected and treated or used to fill the East/Central Pits. Long-Term Closure: Most of this material will be below the water table as the pits are filled with water.	TBD
Haul Roads from Pits to Stockpiles and Rail Transfer Hopper	Operations: Runoff from haul road surfaces will be collected and treated. Runoff from reclaimed side slopes will be handled as stormwater and directed off-site. Long-Term Closure: Haul roads will be removed or reclaimed in-situ, with runoff directed off-site.	TBD
Rail Transfer Hopper	Operations: Runoff from active surfaces will be collected and treated. Runoff from side slopes will be handled as stormwater and directed off-site. Long-Term Closure: The rock portion of the structure will be reclaimed with a geomembrane and soil cover or moved to the East Pit for permanent underwater disposal.	TBD
Railroad Maintenance Ballast	Operations: Runoff from railroad surfaces will be handled as stormwater and directed off-site. Long-Term Closure: Runoff from railroad surfaces will be handled as stormwater and directed off-site.	TBD

(1) The quantities of material for each of these applications will be determined in permitting.

2.1.3 Temporary Waste Rock Stockpiles (including the Ore Surge Pile)

There are two temporary waste rock stockpiles and one temporary OSP. Although the OSP does not store waste rock, the design of the stockpile is similar to the design of the temporary waste rock stockpiles and is thus included in this section. The locations of the stockpiles, as shown in Large Figure 1 through Large Figure 4, are as follows:

- The temporary Category 2/3 Waste Rock Stockpile is located southeast of the East Pit, near Dunka Road.
- The temporary Category 4 Waste Rock Stockpile is located west of the East Pit, over the Central Pit.
- The OSP, which is a temporary storage pile of ore, is located south of the East Pit, along Dunka Road, east of the Rail Transfer Hopper (RTH).

The temporary waste rock stockpiles will receive material from the East Pit from Mine Year 1 to 11 and from the West Pit from Mine Year 2 through 11. Beginning in Mine Year 11, after mining of the East Pit is complete, Category 2, 3, and 4 waste rock mined from the West and Central Pits will be hauled directly to the East Pit for disposal. Category 2, 3, and 4 waste rock will also be used to backfill the Central Pit, after mining ceases in that pit in Mine Year 16. Starting in Mine Year 11, the temporary waste rock stockpiles will be relocated to the East and Central Pits for ultimate disposal, after mining ceases in each pit.

The OSP will allow for temporary storage of ore until it can be fit into the processing schedule or as required due to operating delays. Use of the OSP will allow for delivery of a steady annual flow and assist in providing a uniform grade of ore to the Process Plant. Ore will flow into and out of this pile during the life of the mine as needed to meet mine and plant operating conditions. The OSP footprint is approximately 32 acres with capacity for 2.5 million tons for one 40-foot lift and a maximum capacity of 4.4 million tons in three 40-foot lifts with side slopes at the angle of repose. The OSP will be removed at the completion of mining activities, with the remaining ore processed at the plant or placed in the East or Central Pits for ultimate disposal.

2.1.3.1 Stockpile Design

The temporary stockpiles have been designed to comply with Minnesota Rules, part 6132.2200 to provide for the collection of substantially all water, and Minnesota Rules, part 6132.2400 to minimize hydrologic impacts, be structurally sound, and control erosion on the stockpile surface. Because they are temporary stockpiles, their design does not include progressive reclamation. The stockpiles have been designed with a maximum lift height of 40 feet, bench width of 30 feet, and slopes between benches at the angle of repose of the material, as specified in the Minnesota Rules, part 6132.2400. The stockpile designs include the foundation; underdrain system (when required); liner system; and overliner drainage system. Design of the stockpile sumps and stockpile water management is described in the NorthMet Water Management Plan-Mine (Reference (5)). Details on reclamation of the temporary stockpiles are discussed in Section 7.1.2 for the Category 2/3 and Category 4 Waste Rock Stockpiles and Section 7.2.2 for the OSP.

In preparation for building the temporary stockpiles, the sites will be cleared, grubbed, and geotechnically unsuitable soils (mainly Peat) excavated as needed to support a stable foundation. Structural fill will then be placed, as needed, to meet the foundation grades designed to provide gravity drainage to water collected on the stockpile liner. In areas where elevated groundwater is encountered at or near the liner grades, the stockpiles will be constructed with a foundation underdrain system. The underdrain system will be designed to be above groundwater elevations as much as possible to avoid continual collection of groundwater. After the underdrain system is installed, the liner will be constructed.

2.1.3.2 Liner System Design

The stockpile liner is an engineered system comprised of, from the bottom up, a foundation underdrain system, an impermeable composite liner barrier, and an overliner drainage layer. The underdrain system will capture and convey shallow foundation groundwater to facilitate construction of the liner system and to prevent the development of excess foundation pore pressures during stockpile loading. The impermeable barrier is a composite liner comprised of a compacted soil liner overlain by a geomembrane and has been designed to prevent downward infiltration of water. The high permeability overliner drainage layer minimizes the development of hydraulic head on the impermeable liner by collection and gravity conveyance of water collected above the impermeable barrier to a series of perimeter stockpile sumps. These three liner design components (underdrains, impermeable barrier, and overliner drainage layer) function as a system to enhance liner integrity and stockpile stability.

The composite liner barriers are designed to perform commensurate with the level of environmental risk expected by the waste rock classification type. The composite liner system for each temporary stockpile consists of a minimum of one foot of compacted soil overlain by an 80-mil thick Linear Low Density Polyethylene (LLDPE) geomembrane liner and a minimum of two feet of granular drainage material. The temporary stockpile liner systems are described below and are summarized in Table 2-6:

- Category 2/3 Waste Rock Stockpile: A minimum of one foot of compacted soil liner overlain by an 80-mil thick geomembrane liner and a layer of overliner drainage material. The soil liner will consist of local materials that are scarified, moisture-conditioned, and compacted to meet a maximum permeability requirement of $1x10^{-5}$ cm/sec. Based on the available laboratory and site investigation data (Section 4.1 of Reference (4)), it is anticipated that local glacial till soils will meet the permeability requirements specified for the soil liner materials. This data indicates that the permeability of foundation soils is matrix-supported, i.e., the permeability is governed by matrix soils. If necessary, the soil liner materials will be processed to meet the $1x10^{-5}$ cm/sec permeability design criteria.

- Category 4 Waste Rock Stockpile and Ore Surge Pile: A minimum of one foot of compacted soil liner with a maximum permeability of $1x10^{-6}$ cm/sec, overlain by an 80-mil geomembrane liner and a layer of overliner drainage material. Based on the available laboratory and site investigation data (Section 4.1 of Reference (4)), it is anticipated that the compacted soil liner will consist of locally excavated soils. This assumption of using local material is also supported by the long-term permeability values for glacial till reported in the literature (e.g., Reference (6) evaluated the mean field saturated conductivity for glacial till of $3x10^{-6}$ cm/sec when used for cover materials). As the liner soils are subject to much higher confining pressures, are overlain by waste rock, and are therefore protected from freeze, thaw, and desiccation effects, the long-term maximum liner permeability of $1x10^{-6}$ cm/sec for on-site soils is likely achievable. If necessary, the soil liner materials will be processed to meet the 1×10^{-6} cm/sec permeability design criteria. The Ore Surge Pile requires a thicker overliner drainage layer than the other temporary stockpiles due to the anticipated mine equipment operating on the overliner drainage layer.

Table 2-6 Temporary Stockpile Liner System Design

Temporary Stockpile	Liner System
Category 2/3 Waste Rock Stockpile	12-inch compacted (1×10^{-5} cm/s) soil liner subgrade overlain by an 80-mil LLDPE geomembrane, covered by a 24-inch overliner drainage layer
Category 4 Waste Rock Stockpile	12-inch compacted (1×10^{-6} cm/s) soil liner subgrade overlain by an 80-mil LLDPE geomembrane, covered by a 24-inch overliner drainage layer
Ore Surge Pile	12-inch compacted (1×10^{-6} cm/s) soil liner subgrade overlain by an 80-mil LLDPE geomembrane, covered by a 6-foot overliner drainage layer

2.1.3.2.1 Liner Leakage Analyses

Each of the selected liner systems was evaluated by conducting liner leakage analyses. The methodology and results of these evaluations are provided in Section 5.2.2 and Section 6.1.1 of Reference (7). Results of leakage analyses conducted on the proposed liner systems assuming long-term steady state conditions are summarized as follows:

- Category 2/3 Waste Rock Stockpile: The proposed liner system for the Category 2/3 Stockpile is estimated to provide an average annual leakage rate based on the 90^{th} percentile of approximately 0.63 gal/acre/day prior to the stockpile being relocated to the East Pit; and

- Category 4 Waste Rock Stockpile and Ore Surge Pile: The proposed liner system for these stockpiles is estimated to provide an average annual leakage rate based on the 90^{th} percentile of approximately 0.18 gal/acre/day prior to the stockpile being relocated to the East Pit or removed.

The calculated liner leakage rates listed above disregard the influence of the waste rock uptake potential. This is likely a conservative assumption that inherently overestimates liner leakage because the stockpile materials will be placed dry of the specific retention moisture content (also referred to as field capacity), which is the minimum moisture content required to overcome the gravimetric surface tension so that gravity drainage of precipitation to the bottom of the stockpile can occur (Reference (8)). The moisture content difference between the specific retention and the moisture content of the originally placed waste rock represents the quantity of water that is permanently lost due to moisture uptake by the waste rock. The quantity of water lost from uptake is not available on a bulk basis for drainage. In addition, uptake by the waste rock is expected to delay the onset of drainage from meteoric water through the waste rock due to the amount of time needed for "break-through" of the wetting front on a bulk basis. Hutchison and Ellison (Reference (9)) note that for waste rock placed at a moisture content below its specific retention value "*... possibly even for several months or years, percolation will go toward raising the moisture content of the waste to levels at which leachate flow can ultimately occur*." It is anticipated that a minor percentage of "short-circuiting" may occur at stockpile boundaries, but the total waste rock uptake is likely to remain significant. For instance, 40 feet of material placed in a single lift with a 5% (by volume) uptake differential will need approximately one year for break-though, assuming no evaporation and runoff losses. Therefore, the overall stockpile will essentially behave as a "sponge" with the majority of the precipitation being permanently lost as uptake until the specific retention moisture content is reached.

No operational water balance quantifying the permanent uptake for the stockpiles was conducted for this permit-level design, as the material characteristics required to define the required parameter have not been developed. In particular, to define the uptake potential, the expected moisture content of the materials placed on the stockpiles and their corresponding specific retention moisture contents are required. Limitations on site disturbance currently prohibit the collection of this data. Based on experience on other similar projects, the difference between the initial moisture content of the waste rock and its specific retention value is generally in the range of 1% to 5% by weight, depending on the material's specific properties.

2.1.3.2.2 Foundation Settlement

Compacted waste rock and/or native soils will be used for foundation grading. The foundation soils may exhibit moderate settlement under the high-stress design conditions, as discussed in Section 6.1 of Reference (4). As a result, a LLDPE geomembrane or similar elastic polymer geomembrane will be used for the geomembrane barrier layer component of the liner system for the Category 2/3 Waste Rock Stockpile, Category 4 Waste Rock Stockpile, and Ore Surge Pile due to its reliability to accommodate high strain deformations. Foundation settlement and liner strain calculations are discussed in Section 6 of Reference (4).

Structural fill will dominantly consist of native till soils compacted to 95% of the maximum dry density as determined by the standard Proctor compaction test (ASTM D 698). When Category 1 waste rock is used to develop the foundation grades, rock fill will be placed in controlled lifts and compacted in accordance with a specified rock fill compaction method.

2.1.3.2.3 Overliner Drainage Layer Design

The overliner drainage layer material will consist of crushed rock or processed gravel from on-site materials. The use of a crushed rock overliner has been a standard of practice for high stress mine waste applications for decades; e.g., crushed ore has been used extensively in high stress heap leach liner systems for mining applications for over 20 years. The overliner drainage layer provides a buffer to protect the geomembrane from damage during placement of the waste rock from wildlife, and from the elements (e.g., UV radiation, wind, storm flows).

The overliner drainage layer thickness for the OSP is different from the temporary waste rock stockpiles due to the potential for equipment to be operating on the overliner drainage materials while loading ore onto trains. The OSP requires a minimum overliner thickness of 6 feet, which is based on liner stress computations conducted to accommodate the design criteria of 8 pounds per square inch (psi) maximum vertical stress on the liner from the anticipated mine equipment operating over the liner. The liner system stress calculations are provided in Attachment F (to be provided in permitting).

The overliner drainage layer contains a liquid collection piping network as shown on Details 2 and 3 on Drawing SKP-031 of Attachment B (to be provided in permitting). The preliminary layout of the overliner drainage network of piping are shown on Drawings SKP-020 though SKP-022 in Attachment B (to be provided in permitting). The liquid collection piping design calculations are provided in Attachment G (to be provided in permitting).

2.1.3.2.4 Overliner Drainage Collection

The stockpile subgrades will be designed and constructed to promote positive drainage of future stockpile drainage towards the lined Overliner Collection Sumps (Overliner Sumps). Locations of the Overliner Sumps are shown in Drawings SKP-010 to SKP-012 in Attachment B (to be provided in permitting). Liner grades as shown in Drawings SKP-010 to SKP-012 have been designed to minimize the number of Overliner Sumps at each stockpile. The Overliner Sump design is described in detail in Section 2.1.4 of Reference (5) and are shown on Large Figure 4 through Large Figure 6 of Reference (5).

Underdrain flows are collected in a series of unlined Underdrain Sumps that will be located directly adjacent to the Overliner Sumps, which are shown in Drawings SKP-010 to SPK-012 in Attachment B (to be provided in permitting). The Underdrain Sumps are designed to contain the 24-hour volume of consolidation water expelled from the pores of the underlying soils during the loading process. In addition, the Underdrain Sumps will collect shallow groundwater intercepted by the underdrain piping network.

Stockpile drainage collected in the Overliner Sumps is considered process water and will be pumped to the WWTF (see Section 2.1.4 of Reference (10)). Water collected in the Underdrain Sumps will initially be directed to the Overliner Sumps for conveyance to the WWTF. It is anticipated that the water quality associated with the Underliner Sumps will be the same as groundwater quality and will be of sufficient quality to direct off-site through the stormwater system.

2.1.3.3 Stockpile Construction Quality Assurance Plan

A Construction Quality Assurance (CQA) Plan will be developed for the stockpile construction and is provided in Attachment H (to be provided in permitting). This plan outlines CQA procedures for the installation of the foundation and liner components of the temporary stockpile construction. This plan has been developed to assure that the construction of the soil and geosynthetic components are in compliance with the project specifications and to demonstrate that the regulatory requirements for the construction are achieved.

The objective of the CQA Plan is to assure that the Contractor uses the proper materials, construction techniques, and procedures, and that the intent of the design is achieved. This plan also provides the means for resolution of problems that may occur during construction. The CQA Plan is independent of the quality control (QC) programs to be followed by the manufacturers, installers, and the Contractor.

2.2 Overburden

Surface overburden (about 6% of the excavated volume for pits and stockpile foundations) has been defined as the material that lies on top of the ore body or material that must be removed from stockpile footprints to provide suitable foundations for stockpiles. Overburden excavated to access the ore and to construct the stockpile foundations will be classified based on the physical and geochemical properties of the material, and will be used or disposed of based on the classification.

2.2.1 Overburden Characterizations and Classification

Based on work described in Section 4 of Reference (2), the overburden has been classified into three types, based on their physical and chemical characteristics:

1. Peat – this includes all organic soils
2. Saturated Overburden – this includes all mineral overburden, including zones of soil formation, located below the water table. Classification of this material from the Unsaturated Overburden will be based on the location of the water table as the primary criteria.
3. Unsaturated Overburden – this includes all mineral overburden, including zones of soil formation, located above the water table. Similarly, the primary criteria for identification of this material from the Saturated Overburden will be based on the location of the water table.

2.2.2 Overburden Storage and Laydown Area

The Overburden Storage and Laydown Area (OSLA) will be located south of the West Pit and west of the RTH and WWTF. This area will be used to screen, sort, and temporarily store Peat and Unsaturated Overburden for future use.

The OSLA will be graded to facilitate drainage around storage and processing areas and to allow for storage and future use of Unsaturated Overburden and Peat. Grading of the site will direct drainage to an unlined process water pond in the southwest corner. The OSLA will be unlined, but will be compacted sufficiently to support equipment operation in most areas of the site.

2.2.3 Construction Uses of Overburden

A significant amount of construction material will be required in the first few years of operation to develop the Mine Site. Construction material requirements change over time, but material will continue to be needed throughout the life of the mine for new and expanded haul roads, haul road maintenance, stockpile liners, and ancillary infrastructure. The ability to use overburden as a construction material will be dependent on the application, the expected effect on surface and groundwater quality, and the availability of material relative to when it is needed.

Table 2-7 provides the estimated overburden excavation requirements based on the current design of the stockpiles and pits. This table provides the best available estimate of actual excavation. These quantities were developed based on the depth to groundwater map (Large Figure 9) and depth to bedrock map (Drawing SKP-009 in Attachment A of Reference (4)), both of which have been developed based on drilling records, test pit logs, and monitoring well data collected at the site and will be refined throughout the life of the mine. The overburden excavation volumes for the pit footprints are based on stripping of overburden down to bedrock. The excavation requirements for the Category 2/3 and Category 4 Waste Rock Stockpile footprints and OSP footprint, however, are based on excavation down to the stockpile liner grades and the estimated removal of geotechnically unsuitable overburden (mainly Peat and plastic clays) below liner grade, as necessary. The excavation requirements for the Category 1 Waste Rock Stockpile footprint only include removal of geotechnically unsuitable material around the perimeter for long-term stability of the stockpile and the groundwater containment system.

Based on 2010 high resolution topographic mapping of the Mine Site and additional drilling data, the depth to bedrock map (Drawing SKP-009 in Attachment B of Reference (4)) has been updated. The depth to groundwater map (Large Figure 9) has also been updated based on this new mapping information. Table 2-7 provides the estimated volumes of overburden, by type, based on this updated information.

Table 2-8 lists the proposed construction uses of Saturated Overburden, which allows for an estimate of the approximate volume necessary for disposal in the Category 2/3 and 4 Waste Rock Stockpiles or pits. The estimated Saturated Overburden excavated for the stockpile and pit footprints is approximately 5.6 million cubic yards (MCY). The estimated construction applications listed in Table 2-8 will use approximately 2.6 MCY, assuming these uses are acceptable to the MDNR in permitting. This analysis results in a Saturated Overburden storage need between 3.0 and 5.6 MCY in the Category 2/3 and Category 4 Waste Rock Stockpiles or directly in the pits.

Table 2-7 Estimated Overburden Excavation Volumes

Mine Feature	Area (acres)	Estimated Overburden Excavation Volume (bank cubic yards)			
		Saturated Overburden	Unsaturated Overburden	Peat	Total
Ore Surge Pile	31	21,000	202,000	4,000	227,000
Category 1 Waste Rock Stockpile(1)	526(1)	0	0	220,500	220,500
Category 2/3 Waste Rock Stockpile	180	27,000	274,000	462,000	763,000
Category 4 Waste Rock Stockpile(2)	57	3,000	53,000	43,000	99,000
West Pit	321	4,491,000	1,193,000	1,498,000	7,182,000
East/Central Pits(2)	207	1,047,000	1,450,000	227,000	2,724,000
TOTAL(2)	1,275(2)	5,589,000	3,172,000	2,454,500	11,215,500

(1) The Category 1 Waste Rock Stockpile overburden excavation volumes include excavation of peat within 100 feet from the outer edge of the stockpile for stockpile stability. The stockpile is 508 acres while active but will be regraded as part of reclamation, resulting in a final footprint of 526 acres. The 508-acre footprint was used to calculate excavation volumes within the 100-foot buffer for stockpile stability. The groundwater containment system will surround the final 526-acre footprint

(2) The Category 4 Waste Rock Stockpile footprint overlaps with the Central Pit footprint. The individual areas are greater than the total, which takes into account the overlap. The volumes listed for the East/Central Pits only include the volumes in excess of the Category 4 Waste Rock Stockpile.

Table 2-8 Proposed Construction Applications for Saturated Overburden

Application	Water Quality Rationale	Estimated Cubic Yards
Stockpile Foundation Material Below the Water Table	Operations: Overburden will remain below the water table. Closure: Overburden will remain below the water table.	823,000
Groundwater Containment System Material	Operations: Water contacting this material will be within the groundwater containment system and routed to the WWTF. Closure: Water contacting this material will be within the groundwater containment system and routed to treatment.	249,000
Temporary Stockpile (Category 2/3 and 4 and Ore Surge Pile) Drainage Layer	Operations: Water draining through this material will be collected and treated. Closure: This material will be removed prior to removal of the liner during stockpile reclamation.	1,045,000
In-Pit Haul Road Top Dressing	Operations: Water contacting this material will flow into the pit and be collected and treated, or used to fill the East Pit. Closure: Most of this material will be below the water table within the pits.	10,000
Process Water Pond and WWTF Pond Liner Cover Material	Operations: Most of this material will be submerged; drainage through this material will be collected and treated. Closure: These ponds may be reclaimed as wetlands. This material will either remain submerged in a wetland or be placed below the water level in the pits.	66,000
Soil Liner Below a Temporary Geomembrane Liner	Operations: Geomembrane liner will prevent water from draining through this material. Closure: This material will be removed with the geomembrane liner during stockpile reclamation.	421,000

Due to the geochemical differences between the Unsaturated Overburden, Saturated Overburden, and Peat, the use of the material will mainly depend on the potential impact to water quality. Based on the geochemical analysis to-date, the Unsaturated Overburden can be used in most applications across the site as described below. Peat will be used for reclamation activities. Saturated Overburden will only be used in specific applications as described in Section 2.2.3.1.

A flow diagram of overburden materials and waste rock through the entire life of the mine is shown in Large Figure 10. This allows for a visual representation of the flow of these materials being removed, stored, and used in construction applications. In addition to overburden movement, the use of Category 1 waste rock and borrow material needed for construction purposes, as well as excavated waste rock are also included in the schematic.

As shown on Large Figure 10, borrow material may be required throughout the life of the mine for multiple applications. This will occur when the material requirements are not available from on-site sources, such as in the first year of the Mine Site development when Category 1 waste rock is not yet available or if there are times when there is a greater demand than supply of on-site construction materials. On-site borrow sources of Unsaturated Overburden will be identified in upland areas or areas planned as future pit or stockpile footprints. In addition to on-site borrow areas, additional borrow sources have been identified for use, including the state-owned waste rock stockpile (Stockpile 2012) located approximately 5 miles west of the Mine Site along Dunka Road and the overburden and waste rock stockpiles from the inactive LTVSMC Area 5 east of the Tailings Basin (Large Figure 8).

2.2.3.1 Saturated Overburden

Saturated Overburden will be used for MDNR-approved construction applications. Potential construction uses, as listed below, include applications where it will be placed in a permanently saturated zone, above temporary membrane liners prior to ultimate disposal in a permanently saturated zone, or as the temporary stockpile soil liner immediately below the geomembrane liner. Potential quantities of Saturated Overburden are shown in Table 2-7 and the proposed construction applications are described in Table 2-8.

2.2.3.1.1 Stockpile Foundation Material Below the Water Table

The foundations for the Category 2/3 Waste Rock Stockpile, Category 4 Waste Rock Stockpile and OSP require excavation of geotechnically unsuitable material (mainly Peat) and replacement with geotechnically suitable material. The Category 1 Waste Rock Stockpile will also require excavation of some unsuitable material (Peat and high plasticity clays) around the perimeter of the stockpile for long-term stability. The material used to backfill these excavations could be Saturated Overburden if the fill will be placed below the water table and if the Saturated Overburden is geotechnically suitable.

2.2.3.1.2 Category 1 Waste Rock Stockpile Groundwater Containment System Material

The groundwater containment system proposed for the Category 1 Waste Rock Stockpile will require excavation of material down to bedrock for construction of the soil barrier and installation of the drainage pipe. The material used for this construction could be Saturated Overburden or Category 1 waste rock if the fill is located within the groundwater containment system because water that contacts this fill will be collected and treated.

2.2.3.1.3 Temporary Stockpile Drainage Layer

The liner systems of the Category 2/3 Waste Rock Stockpile, Category 4 Waste Rock Stockpile and OSP include geomembrane liners and require a layer of material above the liner to facilitate drainage and protect the integrity of the liner during construction and decommissioning. Because water passing through these materials above the liner will be collected and subsequently treated, this material can be Saturated Overburden or Category 1 waste rock.

2.2.3.1.4 In-Pit Haul Road Top Dressing

The primary material used for haul road top cover will be crushed rock; however in-pit haul roads may have a top cover of select graded overburden (1-inch minus road aggregate). Because water flowing over or through the haul roads in the pits will be collected and treated during operations and submerged in reclamation or long-term closure, Saturated Overburden can be used as the top cover material for haul roads within the mine pits if it meets material specifications.

2.2.3.1.5 Process Water and WWTF Pond Liner Cover Material

Most of the process water ponds and each of the WWTF ponds will have a geomembrane liner with a protective layer of material over the top. During reclamation, process water ponds, with the exception of the WWTF ponds, will be cleaned out and may be reclaimed as wetlands or backfilled. Once the WWTF is no longer necessary, the WWTF ponds will also be cleaned out and may be reclaimed as wetlands. This material could either remain in place as the saturated wetland substrate or be placed into the East Pit for disposal. Because this protective layer will remain perpetually saturated (and water draining off this material during operations will be collected and treated), this layer can be constructed with Saturated Overburden.

2.2.3.1.6 Soil Liner Below a Temporary Geomembrane Liner

As described in Section 2.1.3.2, the Category 2/3 Waste Rock Stockpile, Category 4 Waste Rock Stockpile and OSP consist of, from top to bottom, a geomembrane liner over a compacted soil liner over a foundation underdrain system, if required. The purpose of the underdrain system is to prevent the development of excess foundation pore pressure below the liner by keeping the soil liner and the bottom of the geomembrane liner dry. Therefore, there will not be any drainage moving through this material. The soil liner will be removed with the liner system and the underdrain system during stockpile reclamation.

2.2.3.1.7 Other Potential Uses of Saturated Overburden

As described earlier, Saturated Overburden as a construction material will generally be limited to use in a permanently saturated zone, above a temporary membrane liner, or as the temporary stockpile soil liner immediately below the geomembrane liner. No other uses of Saturated Overburden are proposed at this time.

2.2.3.2 Unsaturated Overburden

Unsaturated Overburden will be used as a general construction material at the Mine Site with some material temporarily stored in the OSLA. Specific uses will not be limited, as it will be used in any application requiring construction material. In order to meet the required specifications for some of the construction materials, Unsaturated Overburden may be screened and compacted during construction, but cobbles and boulders from this material will not be crushed with the exception of granite boulders, which may be used for haul road cover and railroad ballast. Excess Unsaturated Overburden could be placed in the mine pits during reclamation to facilitate wetland development in the East Pit or provide improved habitat for the West Pit lake.

In locations where Unsaturated Overburden depths are very thin, it may not be practical to excavate the Unsaturated Overburden separately from Saturated Overburden. In these cases, the excavated mixed soils will be treated as Saturated Overburden.

2.2.3.3 Peat

Peat will be used for restoration and reclamation activities at the Mine Site or in off-site wetland reclamation activities. This may include the development of wetlands in the East Pit and within the reclaimed temporary stockpile footprints. Peat will also be mixed with Unsaturated Overburden to increase the organic content for restoration across the Mine Site, including over the geomembrane cover of the Category 1 Waste Rock Stockpile. Excess Peat will be stored in the OSLA until it is able to be used for reclamation.

2.2.4 Disposition of Overburden Not Used for Construction

Maximizing the use of overburden for construction is beneficial; however, not all of the overburden removed can be used for construction. Excess and unusable material will require storage for ultimate use or disposal.

2.2.4.1 Saturated Overburden

Saturated Overburden not used for construction will be commingled with the temporary Category 2/3 or Category 4 Waste Rock Stockpiles. These temporary stockpiles will be relocated to the East Pit after Mine Year 11 and, wherever possible, wetlands will be developed on the space vacated as described in Section 2.2 of Reference (11). Saturated Overburden in the stockpile subgrade could be used as wetland substrate within the wetlands if permanently saturated. Otherwise, Saturated Overburden used in the stockpile subgrade will be placed into the East Pit for disposal.

2.2.4.2 Unsaturated Overburden

Unsaturated Overburden not initially used for construction will be stockpiled in the OSLA or temporarily in areas near its ultimate reclamation use. Any temporary stockpiles needed will be built on upland areas or areas planned as future pit or stockpile footprints. Unsaturated Overburden may also be placed in the temporary waste rock stockpiles for ultimate disposal in the East Pit or used in the East Pit backfill.

2.2.4.3 Peat

Peat not initially used for construction will be stockpiled in the OSLA or temporarily in areas near its ultimate reclamation use. Any temporary stockpiles needed will be built on upland areas or areas planned as future pit or stockpile footprints. If permanent stockpiles become necessary in the future, they will be built on upland areas with process water collection similar to that planned for the OSLA until the area is adequately reclaimed, at which time runoff collection will cease.

3.0 Geotechnical Modeling Outcomes

The geotechnical evaluations completed for the NorthMet stockpile designs are documented in the Geotechnical Data Package Volume 2 (Reference (4)) with stockpile geotechnical modeling methods and results presented in Section 6 of Reference (4) and summarized below. The stockpiles are designed to achieve the following minimum factors of safety:

- minimum long-term (effective stress) operational static factor of safety for deep-seated failures (waste rock mass thickness in excess of 30 feet): 1.3
- minimum short-term (total stress) operational static factor of safety for deep-seated failures (waste rock mass thickness in excess of 30 feet): 1.1
- minimum composite slope (effective stress) pseudo static factor of safety: 1.0
- minimum composite slope static factor of safety at closure: 1.5
- minimum composite slope pseudo static factor of safety at closure: 1.1
- design earthquake peak ground acceleration (PGA) (operations and closure): 0.05g with a return period of approximately 500 years. The PGA for the NorthMet Mine Site is approximately 0.05g using the FEMA maps (Reference (12)) for the spectral accelerations with a 10% probability of exceedance in 50 years.

Global stability analyses were completed to evaluate stockpile stability under static and pseudo-static (i.e., earthquake loading) conditions, to support the basic level engineering designs. The conclusion of this geotechnical evaluation is that the stockpiles with the configurations proposed will meet or exceed the minimum required factors of safety.

4.0 Operating Plan

4.1 Waste Rock

4.1.1 Determining Ore/Waste and Waste Category

Proper identification and separation of the ore from the waste rock, and classification and separation of waste rock are critical to the operation of the mine. A rock sampling plan will be developed and will precede mining to further define the location of the ore and waste rock as well as the waste rock category. The Block Model will be updated as new information is available to delineate the boundaries between ore and the different waste rock categories. This Block Model will be used by the mining engineers to develop the Mine Plan, which will then be used in the GPS Mine Dispatch System to track each truck load of ore and rock. The Block Model is described in Attachment A.

4.1.2 Update Block Model Based on Core Drilling

Additional core drilling will be done as mining progresses. The information resulting from this drilling will be used to refine the Block Model to better define ore and waste rock contacts and evaluate sulfur grade to further classify waste rock into categories. The new drill core information will be incorporated into the Block Model using the process described in Attachment A.

4.1.3 Blasthole Drill Cuttings Sample

Blasthole drill cuttings will be sampled and analyzed for metals and sulfur. Analysis will be done at an on-site or local laboratory to provide the turnaround necessary to be able to use the data for operational mine planning in a timely fashion.

4.1.4 Geologist Observations

On-shift field geologists will make observations of the mining face, mapping the pit walls and fragmented rock. They will provide reports to mine planners and provide direction during mining.

4.1.5 Refined Data at Mining Face

Mine planners will use the updated Block Model, blasthole drill cutting analysis, and geologist's observations to refine the ore and sulfur grades and boundaries at the mining face. These refined grades and boundaries will be the best available representation of ore and waste rock category and will be used to define ore and waste rock category boundaries prior to the blast. These boundaries will be surveyed and monitored for movement during blasting.

4.1.6 Mine Management/Dispatch System

The fleet of mining equipment will be equipped with a Mine Management System, which is frequently referred to as a Dispatch System. The purpose of the Mine Management System is to monitor and control mining equipment to achieve quality and production targets, maximize production, efficiently utilize equipment, increase equipment availability, and improve maintenance practices. Mine Management Systems are computerized systems that utilize technologies such as GPS and wireless communication systems. Mining equipment such as drills, front end loaders, excavators, haul trucks, bulldozers, rubber tired dozers, motor graders, and water trucks are equipped with operator interface panels which enable the equipment operators to communicate with a centralized Mine Management or Dispatch Center. The system tracks production statistics such as cycle times, number of loads or tons, and load origin and destination. The system also utilizes the GPS on equipment to locate loading units in muckpiles and to assign destinations for haul trucks based upon the type of material being loaded.

4.1.6.1 GPS Location System

GPS is an integral component of any Mine Management/Dispatch System. High precision GPS is installed on excavators and loaders to establish their position when loading trucks. High precision GPS can also be installed on rotary blasthole drills to establish the location of blastholes. If the drills are not equipped with high precision GPS, blasthole locations can be surveyed using high precision surveying equipment. Haul trucks are equipped with GPS so their movement between the loading unit and the destination can be tracked. Auxiliary equipment such as bulldozers, rubber tired dozers, motor graders and water trucks can also be equipped with GPS so their locations are known and their movements can be tracked. Bulldozers and other equipment used for construction of roads, stockpiles, and ramps utilize GPS for establishing and maintaining proper elevations, grade control, and direction.

4.1.6.2 Linking Excavator Location to Mine Face

As noted in Section 4.1.5, ore and sulfur grades will be refined to determine ore grade or waste rock category. The boundaries of ore and waste rock categories can then be delineated. The boundaries of the ore and waste rock categories are the excavation limits for each type of material. The digital file of the excavation limits, as extracted from the Block Model, can be loaded onto the interface screen in the excavator or front end loader and physically delineated on the ground with staking. The GPS receiver in the equipment will show the location of the loading device on the interface panel relative to the excavation limits. The Mine Management System can then dispatch the haul truck being loaded to the correct location, either the RTH, OSP, or specific waste rock stockpile, based on the location of the loading equipment. The system recognizes the material that is being dug by its location and assigns the haul truck to the correct destination.

4.1.6.3 Tracking Load to Destination

The GPS and radio communication functions of the Mine Management/Dispatch System enable truckloads of ore or waste rock to be tracked from the source, which is a loading unit such as a shovel or front end loader, to the destination, which is typically the RTH, OSP, OSLA, or waste rock stockpile. The system has the capability of establishing a destination for each material type. If the loading unit is located in ore, the destinations for the haul trucks loaded at that location will be the RTH or the OSP. The same applies to a loading unit located in a waste rock blast, the destinations for haul trucks loaded at that location will be the appropriate waste rock stockpile. The system also has the capability to recognize if a haul truck load is not travelling to the proper destination for the material being hauled. If the system recognizes that a load is going to the incorrect destination, an alarm will sound and a message can be sent to the truck driver, mine operations supervisor, and dispatcher alerting them that the load is travelling to the wrong destination.

4.1.6.4 Data Retention

The Mine Management/Dispatch System collects and retains information such as cycle times, delay times, production, productivity, quality, and GPS locations. This information is analyzed to correlate plant performance with ore delivered for analyzing equipment performance and statistical reporting. Historical data from the Mine Management/Dispatch System can be retained for future analysis, review, and reconciliation.

4.1.6.5 Category 1 Waste Rock Stockpile Confirmation Sampling

Because the Category 1 Waste Rock Stockpile is a permanent feature at the Mine Site, a confirmation sampling program will be developed to verify the average sulfur concentration of the Category 1 Waste Rock Stockpile as it is constructed. The goal of the confirmation sampling program is to verify that the average sulfur content of the stockpile remains less than 0.12%. During construction, samples will be collected in a grid pattern along each lift of the stockpile. The sampling plan will be coordinated with the construction plan, so if test results show that the average sulfur content within any single grid cell exceeds 0.12%, material in that cell can be excavated.

4.2 Overburden

4.2.1 Determining Overburden Classification

The key discriminator between Saturated Overburden and Unsaturated Overburden is the location of the water table. Secondary criteria, such as visual color differences that have been observed, may be developed in the future based on the results of sampling analyses and construction observation.

Groundwater elevations have been monitored across the Mine Site since 2005 as described in Section 4.3 of Reference (7). The magnitude of temporal groundwater elevation fluctuation varies across the Mine Site, but the overall variation in water levels observed in a single monitoring well is typically less than 4 feet. In general, water levels rise in spring and early summer in response to snowmelt and rainfall, and then decline in late summer and fall with the lowest water levels observed during the winter. Given the limited fluctuation, the water table contour map for the Mine Site is considered to have adequate accuracy throughout most of the year for planning purposes. See Section 4.3 of Reference (7) and Section 4.3 of Reference (11) for more detail on groundwater fluctuation.

Digital maps of the surficial water table will be developed annually for the area planned for overburden removal the following year based on test pits (to verify the depth to the water table in the construction areas), construction observations, and continued water table monitoring. These maps will be uploaded into the GPS system of the excavators prior to removal of overburden so that operators will know the elevation of the interface between Saturated and Unsaturated Overburden, both visually and by the location and elevation of the equipment based on their on-board map. Unsaturated Overburden will be removed from a working area first, and then the Saturated Overburden will be excavated separately for proper storage.

4.2.2 Tracking Load to Destination

Overburden loads will be tracked either through paper or electronic tracking, depending on the operator and equipment. When PolyMet-owned equipment is being used for overburden removal, the load tracking will be electronic. As described in Section 4.1.6, mine equipment (shovels, excavators, and haul trucks) will have GPS systems, which will track equipment movements from shovel to destination (construction use, stockpile, pit, etc.) The GPS system in each piece of equipment will be integrated with the Mine Management/Dispatch System.

When the overburden is being removed by contractors, GPS systems may not be available. If a GPS system capable of downloading load tracking is not available for their equipment, truck operators will log each load hauled (source, date/time loaded, destination, date/time dumped) on a daily log sheet. The daily log sheets will be entered into a computer spreadsheet daily.

The combination of these methods will create a computerized record of material movement through the life of the mine.

4.2.3 Data Retention

As described in Section 4.2.2, the daily log spreadsheet and Mine Management/Dispatch System will retain material movement tracking information until the Project is closed.

5.0 Monitoring

Proper long-term management of the Mine Site will depend in part on a systematic monitoring program that will be finalized in permitting. As operations proceed, the monitoring program will be updated as required.

5.1 Water Quantity and Quality of Stockpile Drainage

Stockpile drainage will be monitored for both water quantity and quality to compare with model estimates, define future pumping requirements, and evaluate trends in stockpile drainage water quality. For temporary stockpiles, water quantity from the stockpile sump (overliner drainage) and from the underdrain sump (under the liner) will be monitored. For the permanent Category 1 Waste Rock Stockpile, water from the groundwater containment system sumps will be monitored. Flow meters will be installed on the sump pump piping, and the flow rates will be monitored continuously with reporting requirements determined during permitting.

Water quality sampling of the sumps will also occur on a periodic basis such as monthly or as determined during permitting.

See Section 5 of Reference (5) for more information on water quantity and quality monitoring.

5.2 Stockpile Quantity and Footprint

The stockpile heights and footprints will be monitored to verify that they are as planned. Material loads will be tracked from source to storage location as part of the Mine Management/Dispatch System. This will be done through the GPS system on the equipment for ore and waste rock loads or by manual daily logs from the contractor’s operators for overburden loads, as discussed in Section 4.0. With this tracking system, the stockpile quantities will be monitored throughout the life of the mine. This information will be used to plan necessary future stockpile expansions.

6.0 Reporting and Adaptive Management

Adaptive management is a system of management practices based on clearly defined outcomes and monitoring requirements to determine if management actions are meeting the desired outcomes; and, if not, implementing changes that will best ensure that outcomes are met or re-evaluated. Adaptive management recognizes the uncertainty associated with estimates based on exploration drilling for a 20-year Mine Plan. Adaptive management measures will be developed through the Environmental Review process, permitting, and during operations, reclamation, and long-term closure to define when changes are needed.

A key component of adaptive management for water is the Adaptive Water Management Plan (Reference (10)) that describes adaptive engineering controls that manage water quality and quantity. Fixed engineering controls (liners, groundwater containment systems, etc.) are described in this plan and other management plans. Contingency mitigations that could also be applied, if needed, are also described in this document.

6.1 Annual Reporting

Section 6 of Reference (5) describes water quantity and quality monitoring and reporting.

The annual PTM report will compare the annual actual mined tonnages of ore and waste rock by category to the annual tonnages noted in the PTM application and the tonnages planned in the previous years' PTM report. The tonnages planned for the next year will also be reported in the annual PTM report.

The annual PTM report will include cross-sections and maps of actual stockpile footprints as well as those planned for the next year. These will be compared to the cross sections and footprints noted in the PTM application and the footprints and cross sections planned in the previous annual PTM report.

6.2 Adaptive Management

The main uncertainty associated with infrastructure outlined in this management plan is the uncertainty in the total volume of waste rock and Saturated Overburden to be stored in the temporary waste rock stockpiles. Because the temporary Category 2/3 Waste Rock Stockpile and the temporary Category 4 Waste Rock Stockpile will store the Category 2, 3, and 4 waste rock in addition to the Saturated Overburden, sufficient storage volume is necessary to hold these materials until the East Pit is available for direct disposal. Table 6-1 outlines the total capacity of each temporary stockpile, and Table 6-2 lists the estimated waste rock volumes to be excavated based on Table 2-2 and the estimated volume of Saturated Overburden to be excavated as shown in Table 2-7.

Table 6-1 Temporary Waste Rock Stockpile Capacity

Mine Feature	Stockpile Design Capacity(1) (cubic yards)	Stockpile Potential Capacity(2) (cubic yards)
Category 2/3 Waste Rock Stockpile	27,490,000	31,903,300
Category 4 Waste Rock Stockpile	3,490,600	7,883,500
Total Capacity	30,980,600	39,786,800

(1) The design capacity is the capacity of the stockpile as shown on stockpile drawings (Attachment B).
(2) The potential capacity is the total capacity of the stockpile based on its current footprint with additional lifts.

Table 6-2 Excavation Volumes for Temporary Waste Rock Stockpile Storage

	Category 2/3 Waste Rock(1) (cubic yards)	Category 4 Waste Rock(1) (cubic yards)	Saturated Overburden(2) (cubic yards)	Total Volume (cubic yards)
Excavation Volumes	23,174,500	3,255,700	5,589,000	32,019,200

(1) The volume of waste rock is based on the mass listed in Table 2-2 with a density of 1.9 tons per cubic yard (Reference (4)).
(2) The volume of Saturated Overburden is provided in Table 2-7 and assumes, as a worst case scenario, that all Saturated Overburden will be stored in the temporary stockpiles rather than used for construction uses listed in Section 2.2.3.1.

In addition to the uncertainty associated with the temporary waste rock stockpiles, there is also some uncertainty in the ability of the East and Central Pit to store all the Category 2, 3, and 4 waste rock, some Category 1 waste rock, and the excavated Saturated Overburden not used in permanent construction applications. Once mined, the East and Central Pits have a combined capacity of approximately 78 million cubic yards. As shown on Table 2-2, there will be approximately 140 million tons of waste rock to be disposed in the East and Central Pits, which equates to approximately 74 million cubic yards of waste rock. In addition, there will be approximately 5.6 million cubic yards of Saturated Overburden, as shown in Table 6-2. Approximately 2.6 million cubic yards of Saturated Overburden has been identified for construction uses, as discussed in Section 2.2.3.1. If at least 1.6 million cubic yards of Saturated Overburden cannot be used for construction purposes, there may be a shortage of storage capacity in the East and Central Pits.

One potential mitigation for insufficient storage capacity in the East and Central Pits will be to dispose of some of the waste rock or Saturated Overburden in the West Pit in areas where mining has ceased and potential pit expansion will not be compromised.

6.3 Annual Comparison to Plan

Each year a plan comparison will be completed, as required for the PTM, to keep this document current and to help track changes in the mine plan, rock schedule, and characterization of the material.

6.4 Waste Characterization Update

The Waste Characterization Data Package (Reference (2)) will be updated if it is deemed necessary to do so during the life of the mine. Modifications to this document based on changes to the material characterization will also be completed, as necessary.

6.5 Annual Compliance Report

An annual compliance report will be developed each year for submittal to the MDNR to comply with the PTM requirements. Reporting is as described in Section 6.5.

7.0 Reclamation and Long-Term Closure

Reclamation information included in this document is for the stockpiles only and includes incremental reclamation, final reclamation, and long-term closure activities. See Reference (1), Reference (10), Reference (5), and Reference (13) for reclamation of other Mine Site infrastructure.

7.1 Incremental Reclamation

Reclamation of the permanent Category 1 Waste Rock Stockpile will be incremental starting in Mine Year 14, and the stockpile is expected to be fully reclaimed by the end of Mine Year 21 in order to minimize exposure of the waste rock and the amount of process water generated from the stockpile. The planned mining schedule has the waste rock and overburden in the temporary waste rock stockpiles being relocated to the East Pit in Mine Years 11 to 19; therefore no incremental reclamation is required on the temporary stockpiles.

7.1.1 Permanent Category 1 Waste Rock Stockpile

The Category 1 Waste Rock Stockpile will be progressively reclaimed after material is no longer being placed in the stockpile in order to minimize erosion of the outer slopes, promote long-term closure land use, and minimize the need for active site care and maintenance during the long-term closure period. Prior to construction of the cover system, the stockpile surfaces will be graded for long-term stability, to promote vegetation growth and erosion control, and to develop a surface drainage network over the stockpile.

7.1.1.1 Cover System

An engineered geomembrane cover system will be constructed over the Category 1 Waste Rock Stockpile to reduce the flow of water into the stockpile, thus reducing the load of constituents to the West Pit during reclamation and long-term closure. The Category 1 Waste Rock Stockpile Cover System is detailed in Section 3 of Reference (10). The cover system will be implemented progressively starting in approximately Mine Year 14 and is expected to be fully installed by the end of Mine Year 21. Construction of the cover system includes stockpile re-grading and construction of surface water controls, as described in Section 3.0 of Reference (10).

7.1.1.2 Groundwater Containment System

As the Category 1 Waste Rock Stockpile is progressively reclaimed with the geomembrane cover system, the corresponding sections of the process water ditch will be filled, and the clean surface water runoff will be routed to the stormwater ditch, as shown on the typical sections on Drawing GCS-011 of Attachment C and portrayed on Figure 7-1. The containment system vertical pipe risers will be extended to finished cover grade to provide access for pipe cleanout as shown on the typical sections on Drawing GCS-011 of Attachment B.

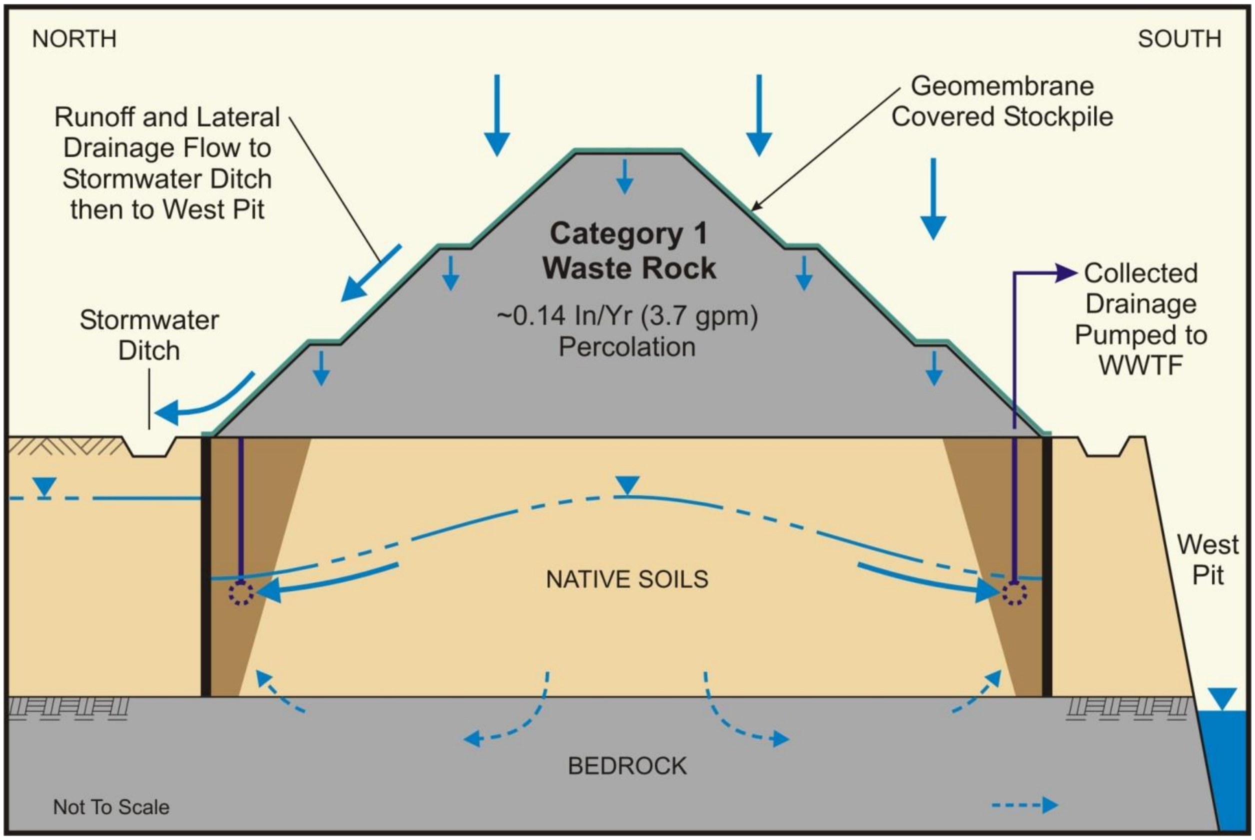

Figure 7-1 Conceptual Representation of Category 1 Waste Rock Stockpile Containment System – Reclamation and Long-Term Conditions Cross-Section

7.1.2 Temporary Category 2/3 and 4 Waste Rock Stockpiles

As discussed in Section 2.1.3, the temporary waste rock stockpiles are the Category 2/3 Waste Rock Stockpile and the Category 4 Waste Rock Stockpile. The material in these waste rock stockpiles will be relocated to the East and Central Pits, after these pits are each mined out or exhausted, and at that time, the footprint of each of the stockpiles will be reclaimed. After removal of the material from these stockpiles, the stockpile footprints, adjacent access roads and associated disturbed areas around the stockpile perimeters will be reclaimed with a growth medium, if needed, followed by seeding and planting.

7.1.2.1 Relocation to Pit

Once mining in the East Pit is completed, Category 2, 3, and 4 waste rock mined from the West and Central Pits will be hauled directly to the East Pit for disposal or to the temporary stockpiles, depending on the rate of backfilling. At that time, the material in the Category 2/3 and Category 4 Waste Rock Stockpiles will also be hauled to the East Pit for final subaqueous storage. The movement of rock from the stockpiles will be timed to allow complete relocation of the material (waste rock and overburden) in the Category 4 Waste Rock Stockpile first, followed by relocation of the material from the Category 2/3 Waste

Rock Stockpile. The Category 4 material is expected to be relocated in Mine Year 11 (approximately 6.2 million tons). The Category 2/3 Waste Rock Stockpile is larger, holding approximately 44 million tons, and is expected to be completely relocated by the end of Mine Year 19.

7.1.2.2 Reclamation of Footprint

Once the waste rock and overburden are completely relocated from the temporary stockpiles to the East and Central Pits, the stockpile bases, which include the overliner drainage system, liner system, underdrain system, if required, and portions of the foundation, will be disassembled for reclamation of the footprint. Generally, pipes, liners, and pumps will be removed and the footprint of the stockpile will be reclaimed.

For the Category 2/3 Waste Rock Stockpile, wetlands will be restored or cultivated where the hydrology and soil conditions exist to support their development. Approximately 60 acres of wetlands have been identified within the Category 2/3 Waste Rock Stockpile footprint. Wetlands could be developed in areas that were wetlands prior to the start of stockpile development, as well as in additional areas where the stockpile load has depressed the soils enough that wetland hydrology can be established from prior upland areas. The plan for development of wetlands within these areas will likely include grading, the addition of soils as needed, and wetland plant propagation. The ultimate goal in restoration and development of wetlands within the former stockpile footprint will be to restore the original flow patterns that existed prior to mining and to establish an area of wetlands equal to or greater than existed prior to mining. For portions of the footprint that cannot be converted to wetlands, the surface will be scarified or soil will be placed over the reclaimed foundation, if needed, followed by seeding.

Once the liner system from the Category 4 Waste Rock Stockpile is removed, pre-stripping for the Central Pit can begin. The Central Pit pre-stripping area almost entirely encompasses the footprint of the Category 4 Waste Rock Stockpile. The small area outside the Central Pit will be reclaimed by scarifying the surface or by placing a soil layer and seeding.

7.2 Final Reclamation

After mining has ceased in the pits, the final Mine Site reclamation process will begin to prepare the site for little or no future maintenance. Final reclamation will be required for the Category 1 Waste Rock Stockpile including groundwater containment system, OSP, and OSLA at this time. Reclamation plans for other facilities and infrastructure at the Mine Site are discussed in Reference (1), Reference (10), Reference (5), and Reference (13).

7.2.1 Category 1 Waste Rock Stockpile and Groundwater Containment System

The Category 1 Waste Rock Stockpile cover system is expected to be complete in Mine Year 21, as described in Section 3 of Reference (10). As described in Section 7.1.1.1, after the geomembrane barrier layer and cover soils have been placed and vegetation is established, the stockpile will no longer generate process water via surface runoff. As described in Section 7.1.1.2, during stockpile reclamation, the process water ditch will be filled, as shown on the typical sections on Drawing GCS-011 of Attachment C and portrayed on Figure 7-1, and the vertical risers will be extended to finished cover grade, as shown on the typical sections on Drawing GCS-011 of Attachment B. Runoff from the reclaimed stockpile will flow to the stormwater ditch, which will be directed to the West Pit.

The Category 1 Waste Rock Groundwater Containment System will continue to operate during reclamation. Water collected by the containment system will be collected and routed to the WWTF for treatment prior to being pumped to the East or West Pit.

7.2.2 Ore Surge Pile

The OSP will be depleted late in the life of the mine, with any remaining material being transported to the Process Plant or disposed of in the East Pit. Similar to the temporary stockpiles, as described in Section 7.1.2.2, the liner, piping, pumps, and sumps will be removed, and the footprint of the stockpile will be reclaimed. Where possible, wetlands will be created with a similar general design as discussed in Section 7.1.2.2; however, there were no wetlands within this footprint prior to stockpile development. Due to the elevation of the railroad, the OSP liner is very deep, so reclamation in this area will likely be suitable for wetland development. If wetlands are developed within this footprint, they will be headwater wetlands connecting to existing wetlands west of the OSP and south of Dunka Road; this will be evaluated further prior to closure of the mine. Portions of the footprint that cannot be converted into wetlands will be reclaimed by regrading, as necessary, scarifying the surface or placing a soil cover, followed by seeding.

7.2.3 Overburden Storage and Laydown Area

The majority of the material stored at the OSLA is expected to be reused for reclamation of the Mine Site. At closure, the OSLA (approximately 41 acres) and any remaining overburden stockpiles will be reclaimed. Approximately 11 acres of wetlands will be impacted in the development of the OSLA. Where possible, wetlands will be created in these areas. For portions of the footprint that cannot be converted into a wetland, the surface will be scarified or a soil cover placed, followed by seeding.

7.3 Long-Term Closure

After the reclamation process is complete, monitoring and maintenance of reclaimed areas will be done, as needed, in the spring and fall and as required by the PTM. If the sites have been damaged by erosion or experienced plant failure and need additional work, a plan will be created and implemented to repair the damage. This responsibility will continue until the release or partial release of PolyMet from the PTM responsibility. Of the areas at the Mine Site discussed in Section 7.1 and 7.2, the Category 1 Waste Rock Stockpile cover is the area that may require further maintenance in the long-term closure period. However, monitoring of reclaimed surfaces will continue until the partial release or full release of these areas from the PTM responsibilities is granted. Long-term closure monitoring of reclamation wetlands is discussed in Section 4.2 of Reference (11).

7.3.1 Category 1 Waste Rock Stockpile Cover Maintenance

The Category 1 Waste Rock Stockpile cover system will be maintained during long-term closure as described in Section 3 of Reference (10).

7.3.2 Category 1 Waste Rock Stockpile Groundwater Containment System

Drainage from the Category 1 Waste Rock Groundwater Containment System will continue to be pumped to the WWTF until the West Pit lake concentrations meet the required water resource objectives or non-mechanical treatment has been proven, as described in Section 2.1.1 of Reference (10).

During long-term closure, water collected by the containment system will be treated at the WWTF and pumped to the West Pit or discharged to a small watercourse that flows into the Partridge River. The ultimate objective is to transition from the mechanical treatment provided by the WWTF to a low-maintenance, low-energy, non-mechanical treatment system as described in Section 6.2 of Reference (10), after the performance of a non-mechanical system has be demonstrated and approved by the MPCA.

7.4 Contingency Reclamation Estimates

The following section provides an overview of the contingency reclamation plan for Mine Year 0 and Mine Year 1. For more specific details on reclamation and the associated cost estimates, see the Reclamation Plan and Contingency Reclamation Estimates that will be part of the PTM application.

7.4.1 Contingency Reclamation Plan (Mine Year 0 and 1)

7.4.1.1 Mine Year 0 (end of construction/development)

If closure were to occur at the end of Mine Year 0, the activities described in Section 7.2 and Section 7.3 will be implemented; however no waste rock will be in the stockpiles and no ore will be in the OSP.

The stockpiles and OSP foundations will be the size as shown on Large Figure 1.

This plan is used to develop the Mine Year 0 Contingency Reclamation Estimate that will be the basis for financial assurance required by Minnesota Rules, part 6132.1200, which is required before a PTM can be granted.

7.4.1.2 Mine Year 1 (end of first year of operations)

If closure were to occur at the end of Mine Year 1, the activities described in Section 7.2 and Section 7.3 will be implemented. The stockpiles and OSP will be as shown on Large Figure 1. Key parameters driving reclamation costs are shown in Table 7-1.

Table 7-1 Key Reclamation Cost Parameters

Key Parameter	Category 2/3 Waste Rock Stockpile[1]	Category 4 Waste Rock Stockpile[1]	Ore Surge Pile	Category 1 Waste Rock Stockpile
Tons to be Relocated	44,021,100	6,206,800	1,300,000[2]	NA
Liner Acres to be Reclaimed	180	29	31	NA
Wetland acres to be constructed	TBD	TBD	TBD	NA
Stockpile Acres to be Reclaimed	NA	NA	NA	201
Feet of Containment System to Add	NA	NA	NA	2,800
Estimated Steady State Containment System Flow[3]	NA	NA	NA	TBD

(1) This table only includes the tonnage of waste rock to be relocated. In addition, there will be approximately 32 million cubic feet of Saturated Overburden that may be included in these stockpiles (Section 6.2), which will also be accounted for in the reclamation costs.
(2) The actual quantity of material in the OSP at the end of Mine Year 1 is unknown due to variability in this pile; therefore the capacity of the stockpile will be used for the reclamation cost estimate.
(3) The estimated steady state containment system flow with the Category 1 Waste Rock Stockpile remaining in Mine Year 1 will be used to estimate the long-term water treatment costs, as documented in Section 7.4 of Reference (5).

This plan is used to develop the Contingency Reclamation Estimate that will be the basis for financial assurance required by Minnesota Rules 6132.1200 the first or second calendar year (depending on construction progress) after the issuance of the PTM. This plan and estimate will be updated annually to include contingency reclamation for the site conditions representative of the end of the upcoming year of operation.

Revision History

Date	Version	Description
06/16/10	1	Initial release to address overburden with Sections 1.0 and 2.2
08/24/10	2	Refine overburden Section 2.2 and address Category 1 Waste Rock groundwater containment system design in Sections 2.1.2 and 2.1.2.2
12/06/10	3	Change in formatting and organization
11/23/2010	4	Add Sections 1.1 and 1.3, add details to Sections 1.0, 2.1, 2.2, 4.0, 5.0, 6.0, and 7.0, and add Attachment A and Attachment E
12/28/2012	5	Significant changes to incorporate project changes related to the decisions made in the AWMP Version 4 and 5. These project changes include the extension of the groundwater containment system along the south side of the stockpile, the use of a geomembrane cover on the Category 1 Waste Rock Stockpile, the use of long-term mechanical treatment, and the potential for non-mechanical treatment in long-term closure. Attachments B (partial), C, D and E were added.
12/5/2014	6	Changes were made to address agency comments and add clarity to the document. There were minor changes throughout for formatting or to clarify text. Other changes include: Remove reference to forecast of annual estimates for contingency closure in Sections 1.2 Update Section 2.1.1 method of rock categorization Update Table 2-3 to include planned and maximum volumes for stockpiles Update Section 2.1.2.3 with remodel results of the Category 1 Stockpile Groundwater Containment System Update Sections 2.1.2.4 and 2.2.3 to describe the state-owned stockpile Update Table 2-5 to include railroad ballast and clarify reclamation of RTH Provide clarity in Section 2.1.3.2 as to the reason the OSP has a thicker overliner drainage layer Update Section 2.1.3.2.1 with remodel results of liner leakage Update Section 2.2.3 for updated overburden volumes and clarity on potential borrow sources Update Section 2.2.3.1 for new use of saturated overburden and updated volumes of overburden Update Section 2.2.3.2 to clarify planned use of cobbles and boulders Update Section 2.2.4.3 for timing of runoff collection Fill in Section 3.0 Update Section 6.0 to describe adaptive water management Update Section 6.1 to clarify content of annual PTM report Update Section 7.1.2 to remove reference to OSP (no incremental reclamation planned for OSP) Update Section 7.1.2.2 and 7.2.2 to remove reference to mitigation wetlands Update Section 7.2.3 to add the area of reclamation for the OSLA Update Section 7.4 to describe location of financial assurance Remove Sections 7.3.4 through 7.3.5

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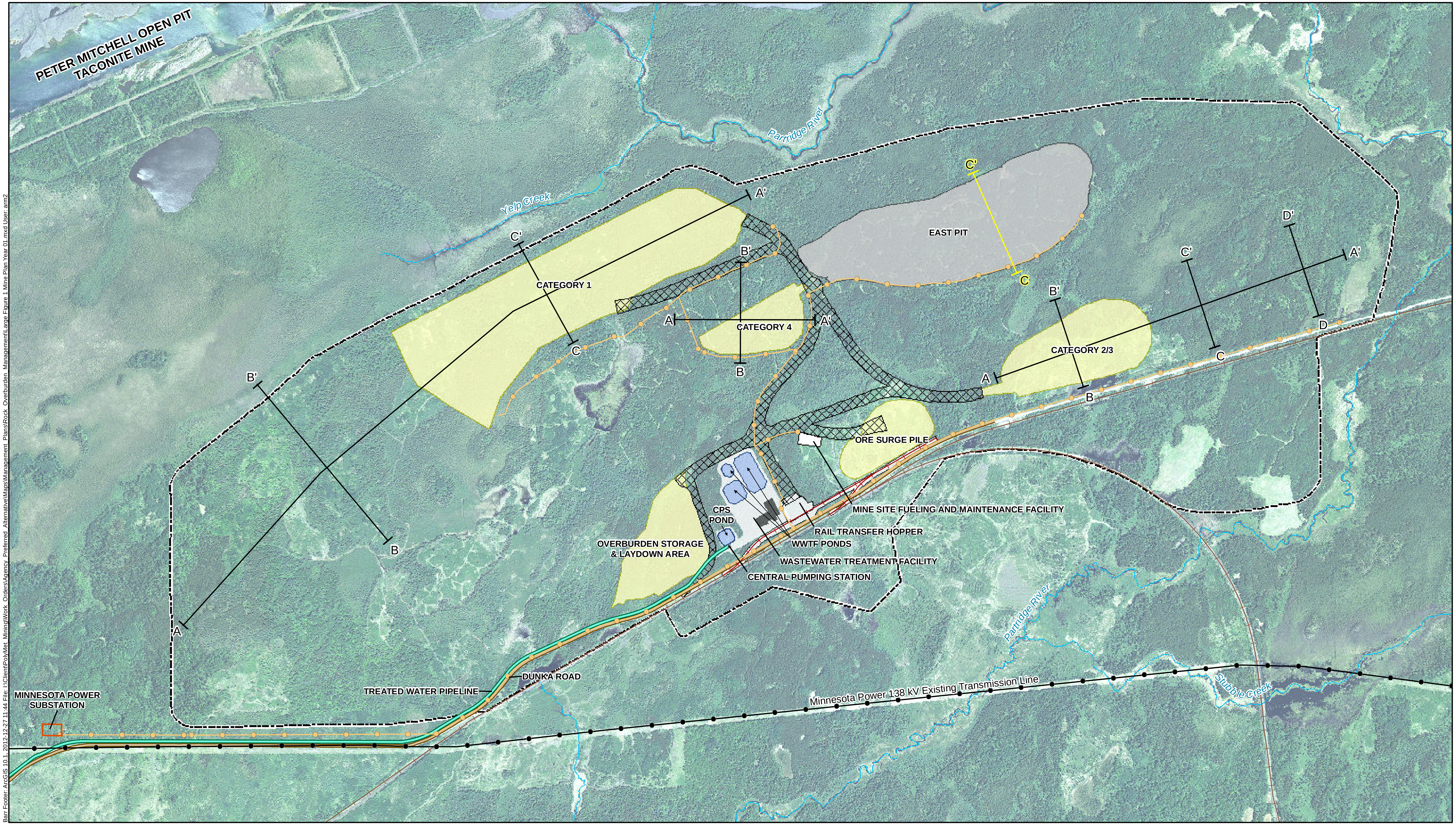
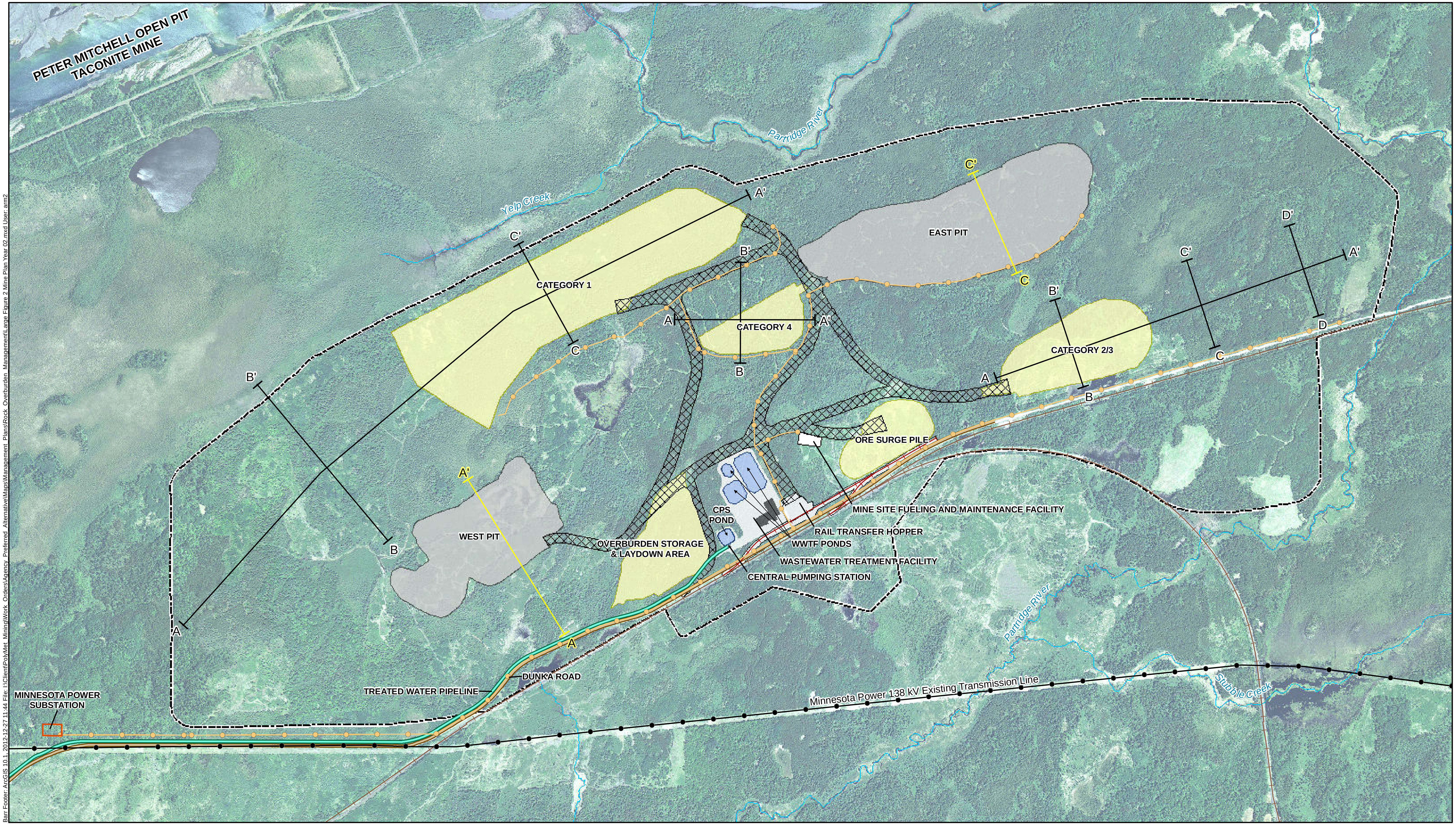


Mine Site
Mine Pit
Active Stockpile
Haul Roads
Mine Pit Cross-Sections
Stockpile Cross-Sections
Proposed Transmission Line
Existing Private Railroad
Proposed Railroad Track

0 750 1,500 3,000
Feet

Large Figure 1
MINE PLAN - YEAR 1
NorthMet Project
Poly Met Mining Inc.
Hoyt Lakes, MN

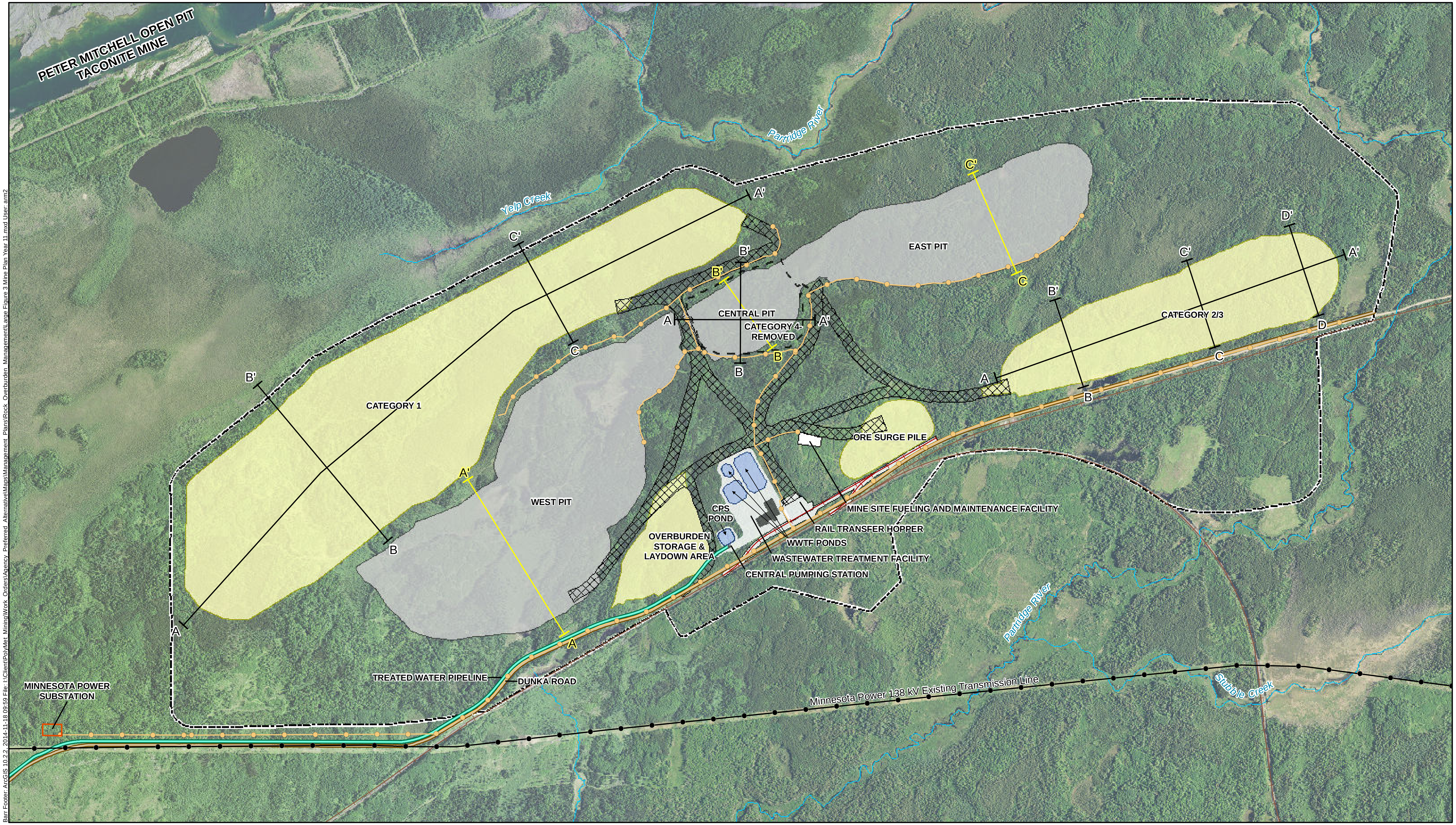


Mine Site
Mine Pits
Active Stockpiles
Haul Roads
Mine Pit Cross-Sections
Stockpile Cross-Sections
Proposed Transmission Line
Existing Private Railroad
Proposed Railroad Track

N

0 750 1,500 3,000
Feet

Large Figure 2
MINE PLAN - YEAR 2
NorthMet Project
Poly Met Mining Inc.
Hoyt Lakes, MN

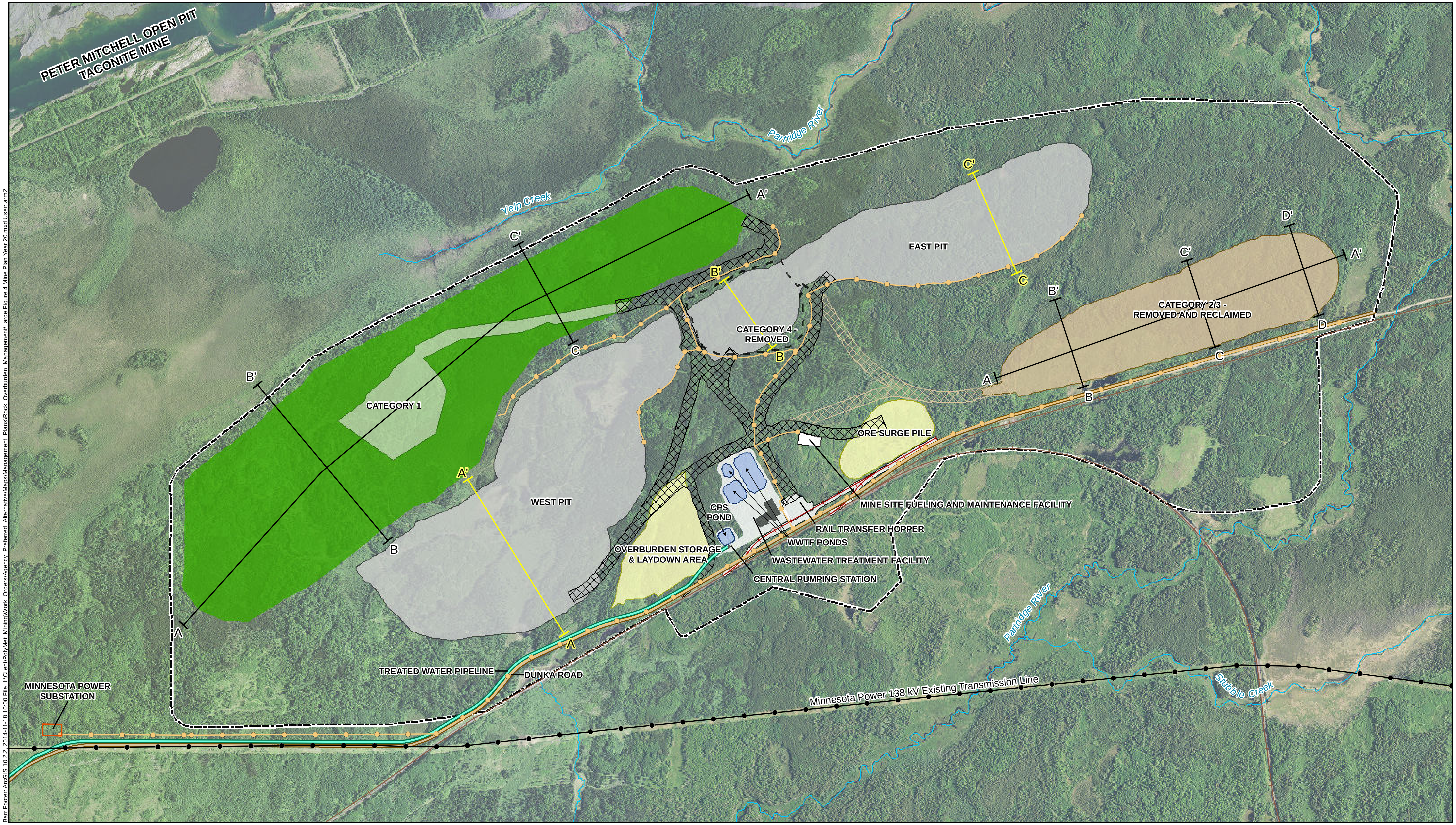


Mine Site
Mine Pits
Active Stockpiles
Removed Stockpiles
Haul Roads
Mine Pit Cross-Sections
Stockpile Cross-Sections
Proposed Transmission Lines
Existing Private Railroad
Proposed Railroad Track

0 750 1,500 3,000
Feet

Large Figure 3
MINE PLAN - YEAR 11
NorthMet Project
Poly Met Mining Inc.
Hoyt Lakes, MN

Barr Footer: ArcGIS 10.2.2, 2014-11-18 09:59 File: I:\Client\PolyMet_Mining\Work_Orders\Agency_Preferred_Alternative\Maps\Management_Plans\Rock_Overburden_Management\Large Figure 3 Mine Plan Year 11.mxd User: arm2

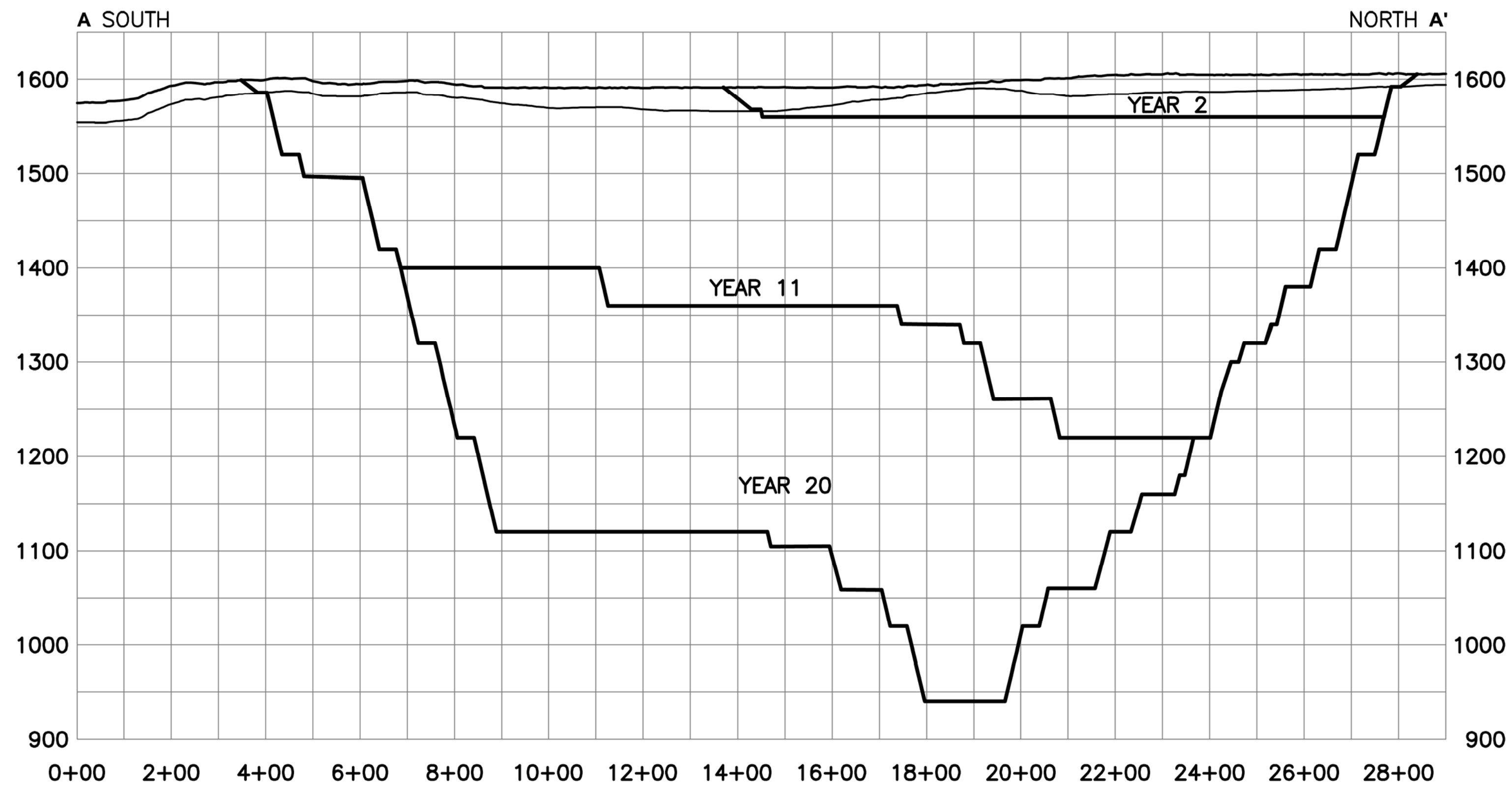


Mine Site
Open Stockpile
Covered Stockpile
Active Stockpile
Removed and Reclaimed Stockpiles
Removed Stockpile
Mine Pits
Haul Roads
Reclaimed Haul Roads
Stockpile Cross-Sections
Mine Pit Cross-Sections
Proposed Transmission Lines
Existing Private Railroad
Proposed Railroad Track

N

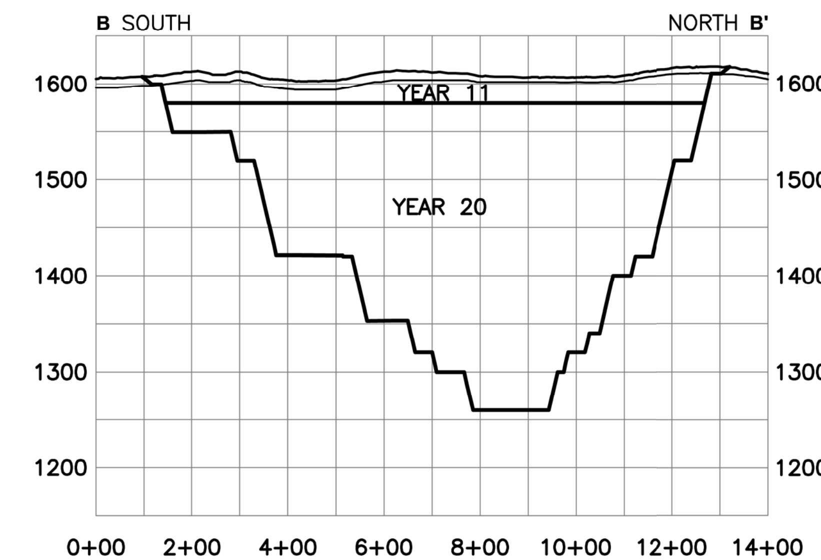
0 750 1,500 3,000
Feet

Large Figure 4
MINE PLAN - YEAR 20
NorthMet Project
Poly Met Mining Inc.
Hoyt Lakes, MN



(A) SECTION: WEST PIT

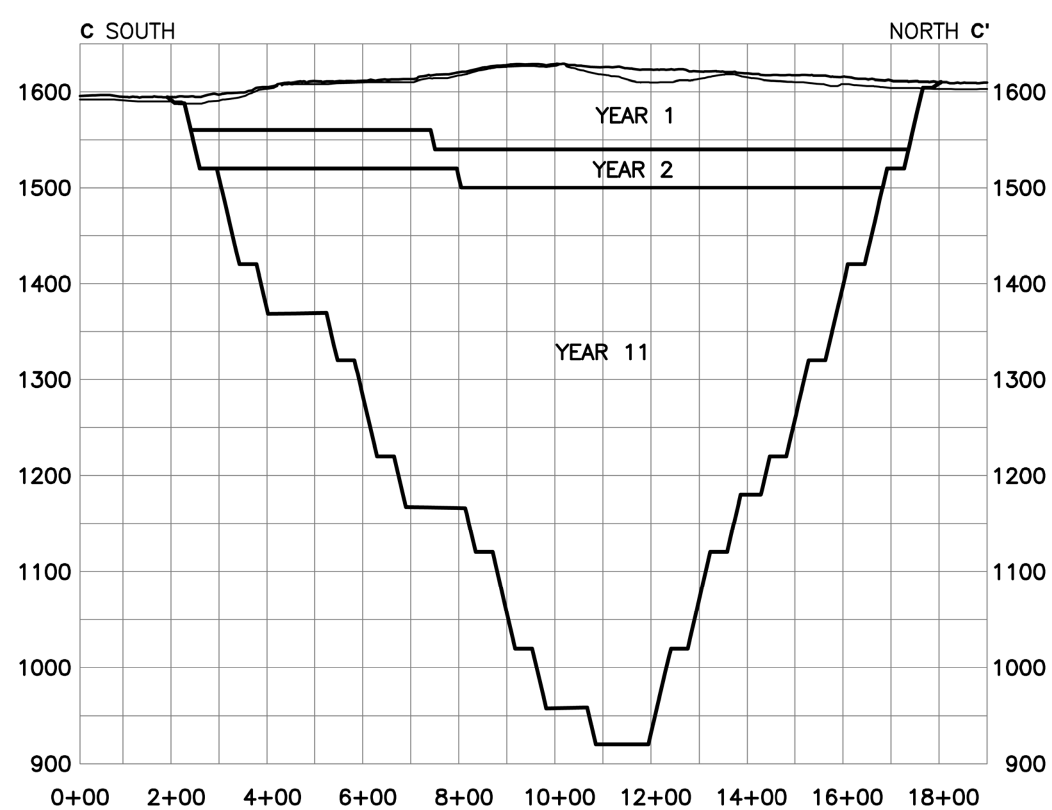
2:1 VERTICAL EXAGGERATION



(B) SECTION: CENTRAL PIT

2:1 VERTICAL EXAGGERATION

NOTE: CENTRAL PIT MINING WILL BE COMPLETED IN MINE YEAR 16.



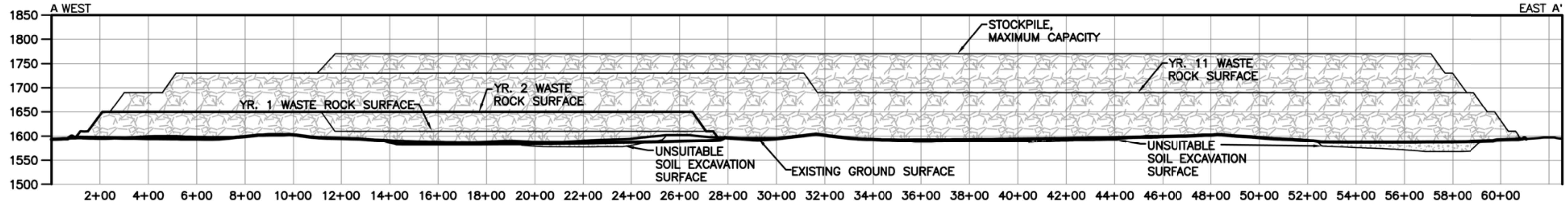
(C) SECTION: EAST PIT

2:1 VERTICAL EXAGGERATION

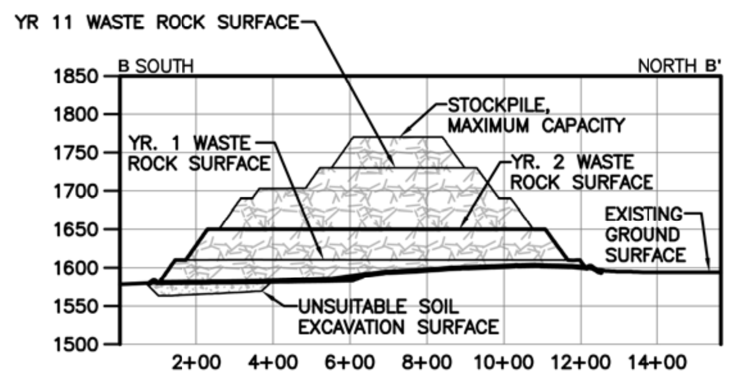
HORIZONTAL 0 400 800 SCALE IN FEET

VERTICAL 0 200 400 SCALE IN FEET

Large Figure 5
PIT CROSS–SECTIONS
NorthMet Project
PolyMet Mining Inc.
Hoyt Lakes, MN



A — SECTION: CATEGORY 2/3 STOCKPILE
2:1 VERTICAL EXAGGERATION



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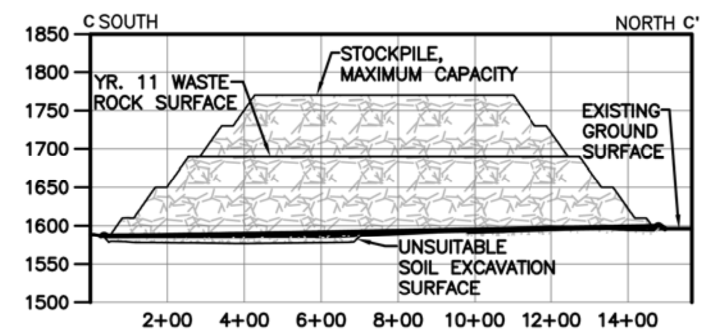
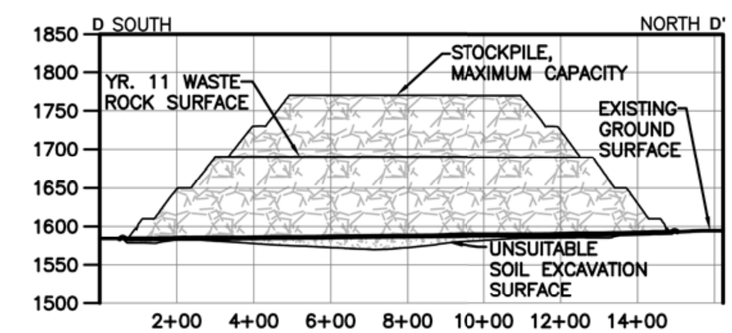
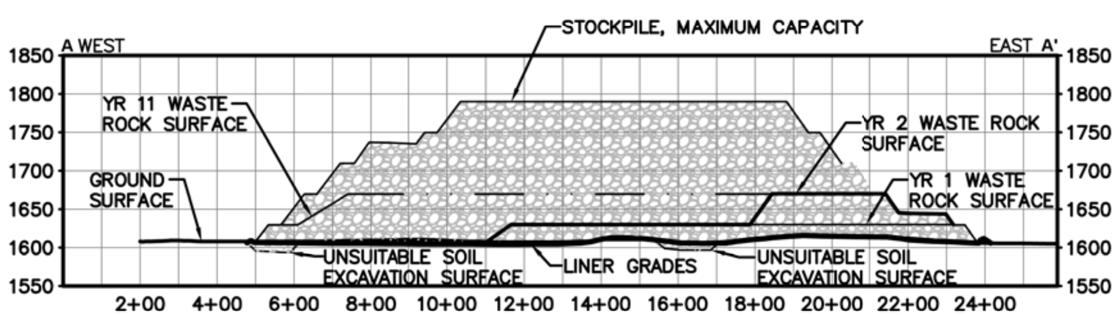
2:1 VERTICAL EXAGGERATION



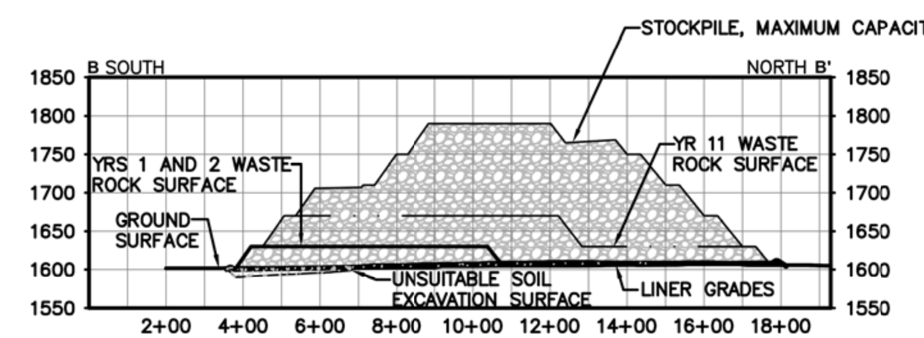
C — SECTION: CATEGORY 2/3 STOCKPILE
2:1 VERTICAL EXAGGERATION



D — SECTION: CATEGORY 2/3 STOCKPILE
2:1 VERTICAL EXAGGERATION



A — SECTION: CATEGORY 4 STOCKPILE
2:1 VERTICAL EXAGGERATION

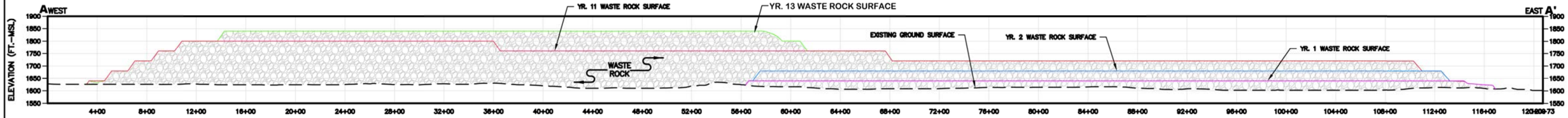


B — SECTION: CATEGORY 4 STOCKPILE
2:1 VERTICAL EXAGGERATION

HORIZONTAL 0 500 1000 SCALE IN FEET

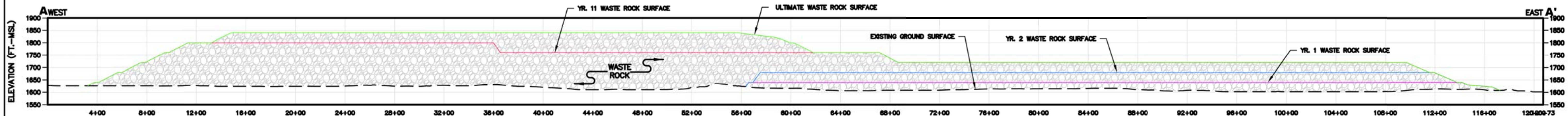
VERTICAL 0 250 500 SCALE IN FEET

Large Figure 6
STOCKPILE CROSS-SECTIONS
NorthMet Project
PolyMet Mining Inc.
Hoyt Lakes, MN



A/8 OPERATIONAL CONFIGURATION SECTION
CATEGORY 1 STOCKPILE

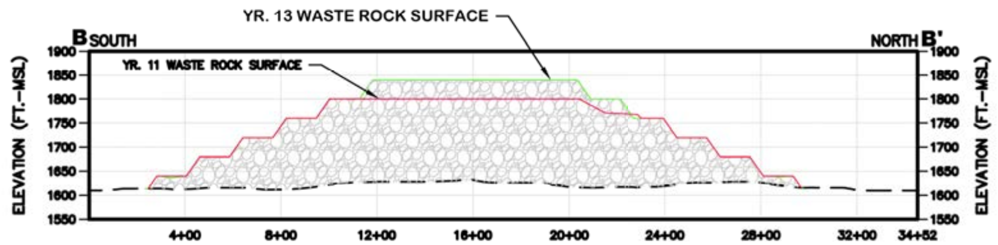
0 400 800
HORIZONTAL SCALE IN FEET
2X VERTICAL EXAGGERATION



A/8 RECLAMATION CONFIGURATION SECTION – INTERBENCH SLOPES 3.75H:1V
CATEGORY 1 STOCKPILE

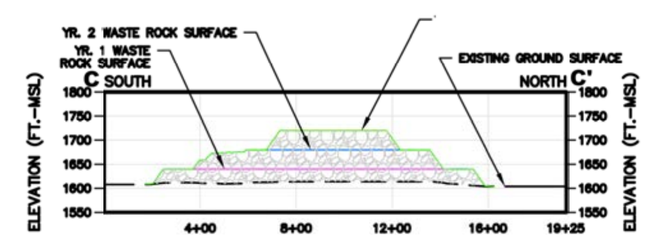
0 400 800
HORIZONTAL SCALE IN FEET
2X VERTICAL EXAGGERATION

NOTE: THE RECLAMATION CONFIGURATION IS SHOWN FOR EACH MINE PLAN FIGURE YEAR FOR ESTIMATION OF CONTINGENCY CLOSURE AND FINANCIAL ASSURANCE.



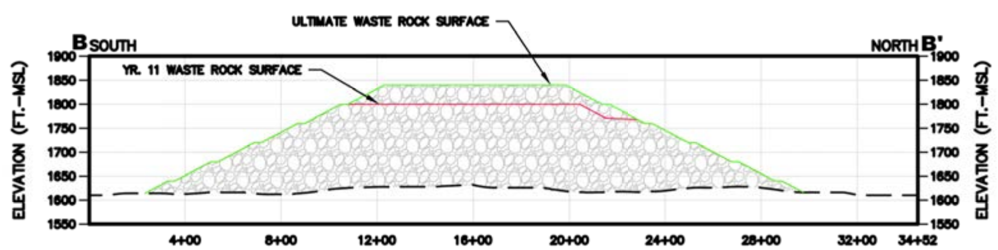
B/8 OPERATIONAL CONFIGURATION – WEST SECTION
CATEGORY 1 STOCKPILE

0 400 800
HORIZONTAL SCALE IN FEET
2X VERTICAL EXAGGERATION



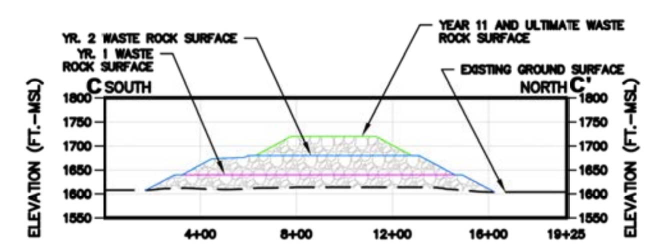
C/8 OPERATIONAL CONFIGURATION – EAST SECTION
CATEGORY 1 STOCKPILE

0 400 800
HORIZONTAL SCALE IN FEET
2X VERTICAL EXAGGERATION



B/8 RECLAMATION CONFIGURATION – WEST SECTION, INTERBENCH SLOPES 3.75H:1V
CATEGORY 1 STOCKPILE

0 400 800
HORIZONTAL SCALE IN FEET
2X VERTICAL EXAGGERATION



C/8 RECLAMATION CONFIGURATION – EAST SECTION, INTERBENCH SLOPES 3.75H:1V
CATEGORY 1 STOCKPILE

0 400 800
HORIZONTAL SCALE IN FEET
2X VERTICAL EXAGGERATION

LEGEND

- YEAR 1 LIMITS
- YEAR 2 LIMITS
- YEAR 11 LIMITS
- YEAR 12, ULTIMATE LIMITS
- EXISTING GROUND SURFACE

CADD USER: Gjeropic, Gordon FILE: E:\113-2209\N-DRIVE-07-18-2012_E CAT1 MODIFIED\113209E014-REV1.DWG PLOT SCALE: 1:2 PLOT DATE: 9/21/2012 8:59 AM

INCHES 1 2

DRAFT

0 500 1000
SCALE IN FEET

VER NO	DATE	DESCRIPTION
A	06/05/12	ISSUED FOR CLIENT REVIEW
B	09/21/12	ISSUED FOR CLIENT REVIEW

DRAWING STATUS	ISSUED	VERSION	DATE
FOR PERMITTING			
FOR CONSTRUCTION			

PERMIT DRAWINGS – NOT APPROVED FOR CONSTRUCTION.

I HEREBY CERTIFY THAT THIS PLAN, SPECIFICATION, OR REPORT WAS PREPARED BY ME OR UNDER MY DIRECT SUPERVISION AND THAT I AM A DULY LICENSED PROFESSIONAL ENGINEER UNDER THE LAWS OF THE STATE OF MINNESOTA.

SIGNATURE ____
PRINTED NAME ____
DATE ____ REG. NO. ____

DRAWN: MTM 06/05/12
CHECKED: GG 06/05/12
GOLDER PROJECT NO.: 113-2209
SCALE: AS SHOWN

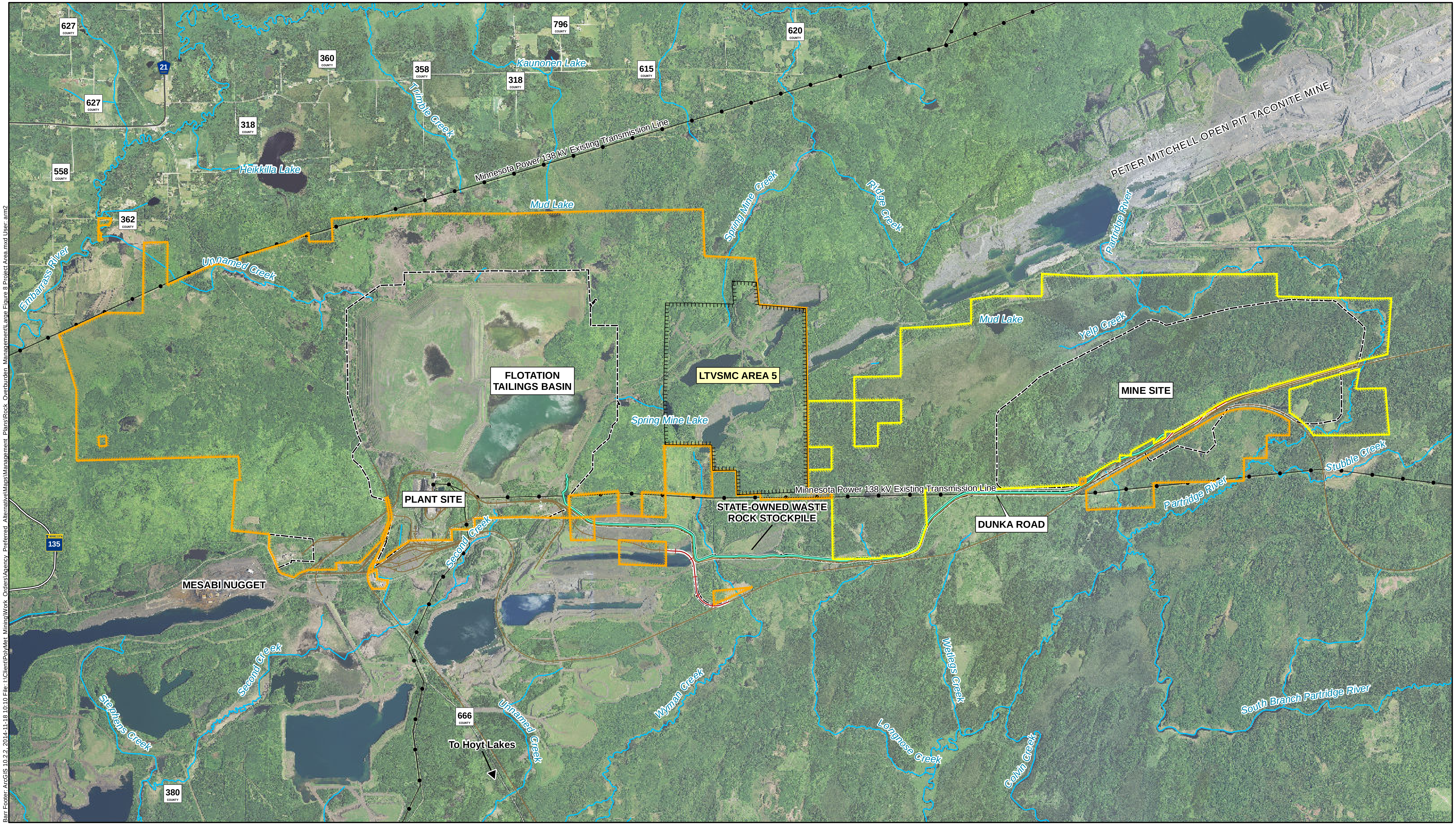
PLANT DRAWING NUMBER:

STOCKPILE CROSS-SECTIONS
CATEGORY 1 STOCKPILE

POLYMET MINING CORPORATION
NORTHMET PROJECT
HOYT LAKES, MINNESOTA

GOLDER ASSOCIATES INC.
44 UNION BOULEVARD, SUITE 300
LAKEWOOD, CO USA 80233
Ph: (303) 980-0540
Fax: (303) 985-2080
www.golder.com

DWG. NO. 8 ROMP Large Figure 7 REV B



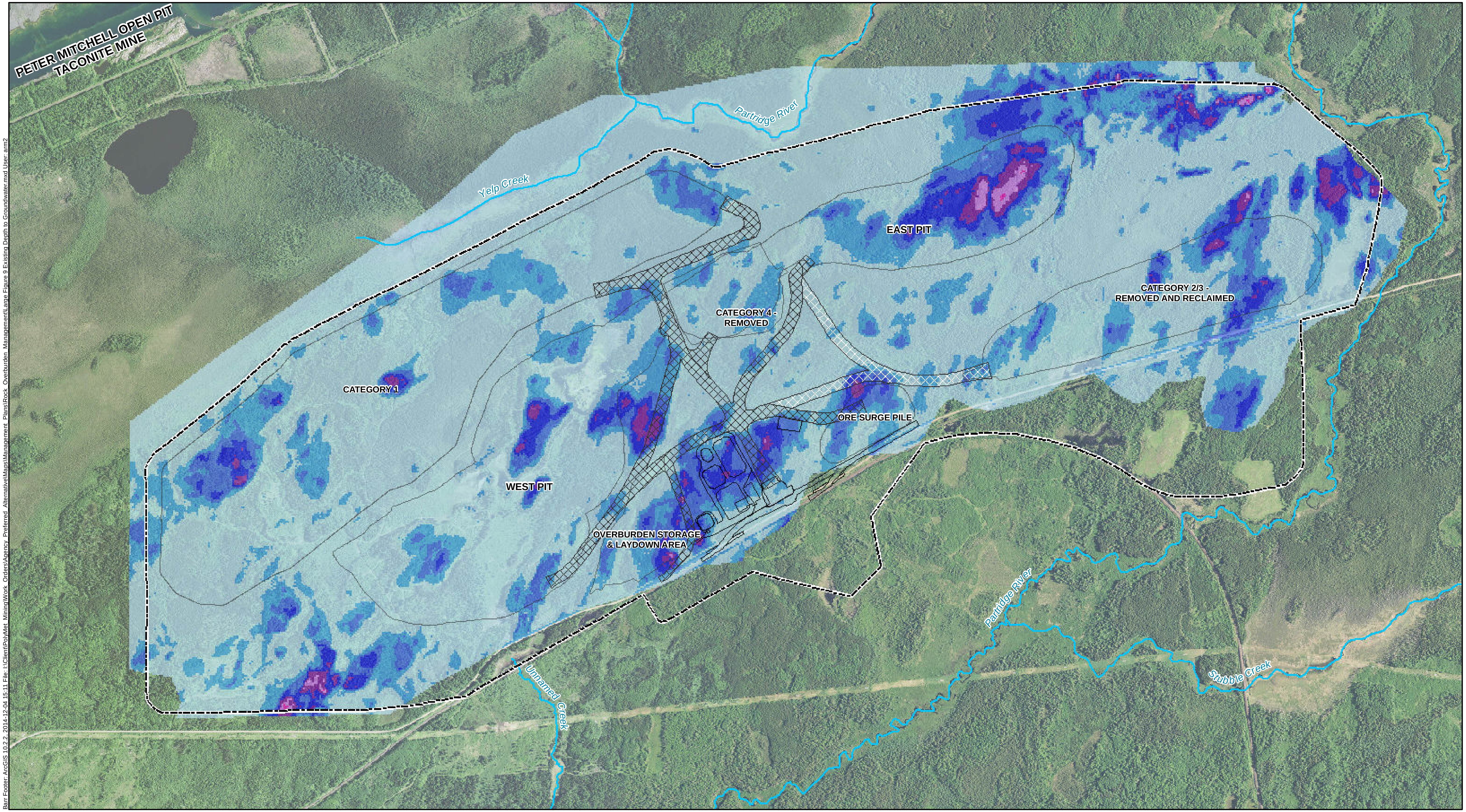
PolyMet Owned/Leased Area
USFS Federal Land Exchange Parcel
LTVSMC Area 5
Project Areas
Treated Water Pipeline
Dunka Road
Proposed Railroad Track
Existing Railroad Track
Rivers & Streams

N

0 0.5 1 2
Miles

Large Figure 8
PROJECT AREA
NorthMet Project
Poly Met Mining Inc.
Hoyt Lakes, MN

Barr Footer: ArcGIS 10.2.2, 2014-11-18 10:10 File: I:\Client\PolyMet Mining\Work Orders\Agency Preferred Alternative\Maps\Management Plans\Rock Overburden Management\Large Figure 8 Project Area.mxd User: arm2



Mine Site
Mine Footprint - Year 20
Haul Roads
Rivers and Streams

Depth to Groundwater[1]

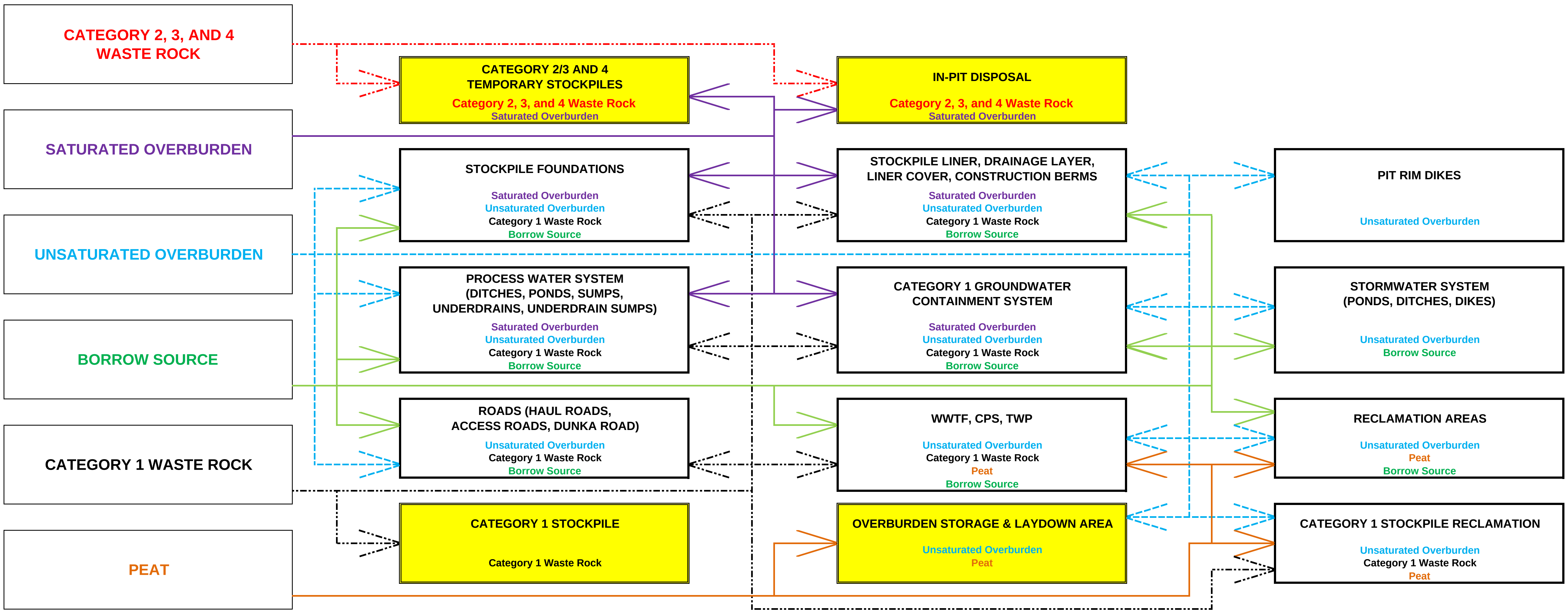
- 0 - 5
- 5 - 10
- 10 - 15
- 15 - 20
- 20 - 25
- 25 - 30
- >30

[1]Depth to groundwater mapping based on drilling records, test pit logs, and monitoring well data collected at the site.

N

0 750 1,500 3,000
Feet

Large Figure 9
EXISTING DEPTH TO GROUNDWATER
NorthMet Project
Poly Met Mining Inc.
Hoyt Lakes, MN



Excavated Material and/or Construction Material

Material Uses

Excess Material Storage

Note: this is a general schematic to show the overall uses of the materials. There may be other minor uses, such as crushing of granite boulders, that are referred to in the text but are not shown here.

Large Figure 10
OVERBURDEN AND WASTE ROCK USE AND STORAGE DIAGRAM
NorthMet Project
Poly Met Mining Inc.
Hoyt Lakes, MN

Attachments

Attachment A

Block Model

POLYMET
MINING

NorthMet Project

Block Model

Version 2

Issue Date: November 7, 2014

Table of Contents

1.0 Block Model

For a mineral deposit to become an ore body, an integral part of the evaluation is the creation of a model (generally digital) which allows the estimation and assessment of grade (quantities of metal or other elements), and therefore value. This model must also quantify the confidence in the estimation of that grade at all locations within the deposit. This confidence categorization is derived from a consideration of a number of factors including geology, continuity of the mineralization, mining method, known grade values (i.e., drill hole samples), and the distances from known samples to the point being estimated. As a measure of predictability, this goes well beyond geologic confidence and is the foundation of the resource and reserve confidence categories needed for project planning and financing.

PolyMet operates under Canadian National Instrument 43-101, which is a standard for reporting on mineral development projects. This standard references the Canadian Institute of Mining (CIM) "Estimation of Minerals Resources and Mineral Reserves, Best Practice Guidelines" (Reference (1)). Under this guidance, deposits (or parts of deposits) can be classified as resource or reserves. A resource is a mineral deposit that has a reasonable expectation of being mined at a profit. A reserve is a resource that has been evaluated to at least a "preliminary feasibility study" stage and is shown to be minable at a profit. The definitions of resources are further broken down to Measured, Indicated, and Inferred, based on their statistical and geologic confidence. PolyMet also uses a fourth category, "in-fill", to insure that the entire model has a value at each block based on available information. Mining companies evaluate the number of "in-fill" blocks and use this information to plan future drilling programs. Reserves may be either Proven or Probable. Measured Resources may be classified as Proven Reserves and Indicated Resources may be classified as Probable Reserves if they meet economic and technical criteria determined by the Feasibility Study, as shown in Table 1-1.

Table 1-1 Relationship between Resource and Reserve

	Higher ← Statistical and Geological Confidence in Grade Values → Lower			
Resources	Measured	Indicated	Inferred	In-fill: Not Reportable
Reserve	Proven	Probable	Not recognized as reserve	Not recognized as reserve or reportable
PolyMet Modeling Confidence Category	1	2	3	4

The amount of material in the resource and reserve categories for a particular deposit are dynamic, changing over time as geologic interpretation or assay data densities change (i.e., using information from additional exploration or development drilling or from changes in the geologic interpretation of the deposit). They are not strictly fixed by the above guidelines, which leave the final decisions up to the "Qualified Person" (or Persons) responsible for the estimation.

Block modeling is the de facto standard method of resource estimation for most metal mines, particularly open-pit mines. This is due in large part to the fact that pit optimization software requires a block model as input. *Pit optimization* is the process of defining a pit shell (i.e., a conceptual hole in the ground without regard to roads and some other design factors) that encompasses the greatest net present value of ore. *Pit design* is the process of establishing roads, sumps, and scheduling of the extraction of the ore in a safe fashion that matches the tonnage and grade required by the plant to produce a final product. This design work is done to best fit the optimized pit shell. Figure 2-1 is a view of an economic pit shell derived from optimization software, and the resulting pit design needed to extract the ore in a safe and efficient manner.

Other less used or older resource estimation methods include polygonal-manual, gridded seam models, and triangulation.

A block model is best described as a three dimensional array of regularly spaced data points. By virtue of the individual cell size each cell represents a specific volume of rock. This volume of rock is the "block" in a block model. Each cell in the model can carry a series of attributes representing the chemistry, or other quantitative properties, of the deposit. The cells are populated with information from drill hole data from several sources such as geologists, geochemists and geophysicists over the course of an exploration program. Because the density of the rock is known, (either averaged or modeled) block tonnage can also be calculated. In simple terms, this modeling is the 3-D version of the 2-D gridding and contouring done in many software programs (e.g., Surfer, ArcView).

2.0 Modeling Process Steps

The entire block modeling process for grade is a method of translating or modeling irregularly spaced drill hole based assay data to a regular 3-D array of data points. However, this is not a purely mathematical process carried out in a vacuum, but must be done in the context of what is known of regional and local geology so that the model is a reasonable representation of the geology and geochemistry of the deposit.

The general process of populating a block model follows a sequence of:

- Collection and verification of drill data. This includes qualitative (primarily lithologic and mineralogic information obtained by geological logging of the drill core); quantitative (assays, density, rock strength, percent of sample recovered and other information); and spatial data such as drill collar location, angle of drill hole, and azimuth. In NorthMet's case, all historical data was re-compiled and verified in 2004 with new data undergoing rigorous quality control prior to inclusion in the database. Figure 2-2 and Figure 2-3 show the top of the Virginia Formation and all drill holes, colored by geologic unit and sampling respectively.

- Use of lithologic and structural geology data to construct a digital geologic model. This can be done directly in the computer or by digitizing hand drawn cross-sections (NorthMet's model was done in the computer with extensive reference to paper sections). To be valid, this digital model needs to honor as much definitive data as possible, such as surface topography, depth to bedrock, outcrop location, and drill hole intercept points to well defined horizons or contacts.

  The geologic model of the deposit is created by generating a series of surfaces representing the tops and bottoms of geologic units. These surfaces include the boundaries between units, and also include the ledge (top of bedrock) surface. These surfaces are based on cross-sections at one-hundred foot spacing across the deposit. Cross-sections are coincident (parallel or perpendicular) to the geometry of the block model. See Figure 2-4 and Figure 2-5 for examples of these 3-D surfaces.

- Compositing of quantitative data. Drill hole data is generally recorded in intervals measured downwards from the top of the hole. Very often different types of data will be measured on different intervals. For instance, rock type changes may be measured in irregular intervals from inches to many feet, or major lithologic units may be intervals hundreds of feet in length (i.e., reflecting the true nature of the geology) whereas assay or geotechnical information may be measured in regular (five or ten foot) intervals. Compositing of drill hole data is the process of applying a weighted average of the numeric data into discrete and regular intervals. Often, the composites at the edge of the geologic units will have their length adjusted so that they do not cross geologic boundaries. Composites are not used (forced to null) if their "support", or amount of actual sample within the interval, does not exceed a certain percentage of the composite length. It is also important to note the difference between a zero value and a null value. Zeros are used in calculation; nulls are treated as if the data point did not exist.

- Variography. This is the geostatistical evaluation of the data to quantify two important variables in the modeling process: 1) spatial continuity-the safe distance that assays can be projected in order to realistically represent a model of the grades in the rock mass, in other words, "what is the meaningful sample spacing?" and 2) isotropy / anisotropy, which determines if the continuity of mineralization is the same in all directions, or whether it is longer in one direction (e.g., along strike) than another (e.g., down dip). These are important variables that have a direct input into evaluating the adequacy of the drilling density and also the next steps of the modeling process.

  The variography compares pairs of samples at larger and larger distances and graphs this variation against distance which will, at some point, define the distance beyond which the grades cannot be accurately projected. These numbers may not be directly used, but are an important consideration in the overall estimation.

  Other statistical testing is done to determine whether or not the chosen boundaries are supported by the numeric data and whether the grade distributions are reasonable.

- Selection of Search Ellipse. The information from the variography is used in determining the optimum size and shape of the "search ellipse". During the grade estimation process each block is assigned data from the nearby drill hole composites. The search ellipse is the distance along a set of X, Y, and Z axes within which samples can be used in estimation. The center of the ellipse is the centroid of the block being estimated. The distance is directly related to data confidence in that direction. The overall size of the search ellipse is related to the confidence ranking (measured, indicated, inferred, in-fill). The ellipse axis may be tilted to conform with geologic parameters (i.e., dipping rock units or structural zones).

  If the data were fully isotropic, the search ellipse will be a sphere; if the data are anisotropic, the search ellipse may be longer in the direction of the strongest continuity and shorter in the direction of the least continuity. See Figure 2-6 for an image of a search ellipse.

- Creation and Assessment of Domains. As part of the process described above, it is necessary to assess the geologic continuity of mineralization for estimation purposes. In particular, it is important to assess whether or not the mineralization follows clear geologic controls (i.e., unit boundaries or structure), is independent of these controls, or some combination of the above. A number of separate geological / geochemical domains were defined for the purpose of deposit modeling at NorthMet. First, two mineralized domains were defined, Domains 1 and 6. Domain 1 is the main zone of mineralization and occurs mainly in Unit 1, though it may extend into the base of Unit 2. Domain 6, the Magenta Zone, occurs higher in the Duluth Complex in Units 3 – 6 and cross-cuts the upper units in the west half of the deposit. Secondly, the dominantly unmineralized domains were defined. These consist of the Virginia Formation, the unmineralized portions of Units 1 and Units 2 through 7.

- Geologic coding of block model. Geologic unit is assigned to the block model by selecting all blocks between two surfaces. For example, all blocks between the top of Unit 1 and top of the Virginia Formation are coded as Unit 1. At the boundaries the unit coding of the block is assigned based on the percentage of the block lying on one side or the other of the bounding surface. Once all blocks are given a geologic attribute, that attribute can be used to determine which blocks in the model the estimation routines are acting upon. See Figure 2-7 for a cross-section of the geology at NorthMet, and Figure 2-8 for the same image with the block model superimposed on the geology.

- Interpolation of values into model. During the interpolation process, a subset of blocks is chosen for estimation, and then the software sequentially finds the centroid of a block, and using criteria such as number of drill holes and number of composites within the search ellipse distance, assigns a value (essentially a 3-D weighted average) to that block based on surrounding samples. If the criteria cannot be met for number of holes or number of samples within the search radius, the block will be passed over by the first interpolation run. Once all blocks in the model have been done for a set search radius, the radius is expanded and the routine is run again, filling in some, but not all blocks with a value. Blocks assigned a value are ignored in subsequent passes.

  For the NorthMet model, with 5 domains, each domain has a separate interpolation run resulting in 4 confidence categories of confidence that generally correspond to Measured, Indicated, Inferred, and "in-fill". The "in-fill" category is used to ensure that each block in the model has been assigned a grade value though these grades are not used to report resources. Each domain thus requires four estimation passes for each of the six valuable elements (Cu, Ni, Co, Pt, Pd, & Au) as well as for elements of process and environmental significance (S, Ag, As, Ba, Be, Cd, Cr, Mn, Mo, Pb, Sb, Zn).

  See Figure 2-9 for a cross-section at NorthMet with confidence blocks superimposed on geology, and Figure 2-10 for a section with Net Metals Value superimposed on the geology.

2.1 Use of the Block Model

Once the model is populated with grade and other data, it is generally output to other software for pit optimization and mine design. This requires some assumptions about metals prices, grade or value cut-offs, and mining costs. The blocks are assigned a value based on metals price. The optimization software "virtually" mines the deposit from the top downwards-those blocks above cut-off being classed as ore, those below cut-off as waste. This is done through many iterations and the highest value scenario is then investigated for practicality as a mine design.

Once a pit is designed, the blocks within the pit can be assessed by grade, the measured and indicted resource blocks within the pit may be classified as proven and probable reserves. Data can be output to other programs for assessment. Figure 2-11 shows 3-D Top of Virginia Formation, 20 year pits, Unit 1 blocks above cut-off grade, and the Magenta Zone as a transparent solid.

2.2 NorthMet Block Model Parameters

The 2011 NorthMet block model parallels the deposit geometry, striking N56.06°E, with block size of 50 feet by 50 feet by 20 feet high. There are 399 columns, 122 rows, and 81 levels (3,942,918 blocks). The current model stops at sea level (about 1,600 feet from surface). The overall model limits extend well beyond the expected mining area in all directions.

The 20 year pit shell includes approximately 133,000 ore and waste blocks. Of these, 45.2% are in the measured category, 54.2% are in the indicated category, 0.4% are inferred, and the rest (~0.01%) in-fill. The conversion to reserve can change these percentages a small amount due to economic considerations.

Besides geochemical data, there are attributes stored in the block model for parameters such as geologic unit, density, year expected to be mined, distance to sample, ID of closest drill hole, number of samples used in interpolation, confidence ranking, and net metals value.

Drill hole assay data (mostly five and ten foot samples) were composited to 10 foot samples along the drill hole (length weighted averages). The composited values were used for estimation.

The metals expected to be produced at NorthMet (Cu, Ni, Co, Pt, Pd, and Au) were given values of close to zero where data was absent (based on examination of drill hole data for particular units). Where analyses for Pt, Pd, and Au returned results below detection limit a value of one-half the detection limit was used. This is normal practice to ensure conservatism in the resource evaluation. No copper, nickel, or cobalt values were used below the detection limits and hence no factoring was used in populating the model for these elements.

For the elements with potential effects on water discharge standards (S, Ag, As, Ba, Be, Cd, Cr, Mn, Mo, Pb, Sb, Zn) all values reported as less than detection limit were replaced with the detection limit value, then, all “not sampled” drill core intervals were assigned the average of the data set. This is a conservative method in that it tends to raise the average value for compositing.

Each element was analyzed for spatial relations within each of the domains (variography) using the composited value. From that analysis modeling geometry was established for interpolation of values into the block model.

2.3 Block Model Data and Raw Drilling Data

There are two data sets on rocks within the deposit - drill core and the block model. It is important to recognize that the process of going from irregularly spaced drill hole data to composites, and ultimately to a derived block model, tends to smooth out the grades. The highest values will be lowered and the lowest values will be raised. This makes sense because all samples are smaller than blocks-and block values are representative of the average of many samples-the average block value will always be lower than the highest composited drill core values. Table 2-1 shows how average and highest values for copper decrease in the process of going from raw data, to composites, to the block model.

Table 2-1 Comparison of Raw Data, Composites, and Block Data[1]

	Minimum % Copper	Maximum % Copper	Average % Copper
Raw Drill Hole Data	0.0	4.89	0.161
10-Foot Composites	0.0	2.2	0.155
Block Model Data	0.001	1.15	0.134

Note that this represents raw, composited and block model data within the 20-year "APA" pit. Because the pit is created after the block model, there can be block data with higher values than the in-pit composites.

The NorthMet drill core data set consists of 436 drill holes divided into a total of about 39,000 multi-element assay intervals. Each analyzed interval is also classified by geological unit and rock type. The drill core data set provides information (a measurement) only about the specific points in the pit that were drilled.

The block model was generated from the (composited) drill core data set using accepted geostatistical principles and knowledge of the geology of the deposit. Within the planned 20 year pit there are over 133,000 blocks (or parts of blocks) providing information (an estimate) at any point in the pit. The values in many of these blocks are derived from data points outside the pit. The resolution of the block model is the size of the blocks (50 feet x 50 feet x 20 feet).

Each block has chemistry values (%S, %Cu, %Ni, ppm Co, ppb Pt, ppb Pd, ppb Au, ppm Ag, ppm As, ppm Zn, ppm Cd, ppm Pb, ppm Ba, ppm Be, ppm Cd, ppm Cr, ppm Mn, Pb, ppm Sb), plus values for tons, and year mined. Each block is identified as "ore" or "waste rock" based on metals value. Each waste rock block is assigned to a waste category (Category) based on sulfur content.

2.4 Block Model Data Used for Mine Pit Water Chemistry

Pit water quality modeling requires input data on rocks that make up the surface of the pit wall, organized by elevation and Category. The mine pit walls are divided into 20 foot vertical zones with the tops and bottoms of the zones corresponding to tops and bottoms of blocks. The blocks that contact the pit shell within each zone are identified as edge blocks. Some edge blocks may contact the wall and some may contact the floor; some may only contact the shell across a very small area. The planar (i.e., area looking down) area of each zone is calculated by assuming that the floor blocks are 100% in the edge (i.e. exposed) and the wall blocks are 50% in the edge. This area is calculated for each Category of waste rock in a zone. This is done for the pit shell representing the 20 year pit. Figure 2-12 and Figure 2-13 show the blocks contacting the pit, and those that contact or are above the pit (note that the pit wall intersects the plane of the section at an oblique angle and that blocks that appear to not be contacting the surface are contacting in the third dimension).

2.5 Block Model Data Used for Stockpile Chemistry

Stockpile drainage water quality modeling requires input data on rocks that are placed in each stockpile organized by year. The mining schedule shows what year each block of material will be moved. The Category of the block determines which stockpile each of the waste rock blocks will be placed in.

Chemistry of the rock placed in each stockpile each year will be calculated as the average of the chemistry values of all of the blocks added to that stockpile during that year.

The total tons added to each stockpile each year will be calculated as the sum of the tons all of the blocks added to that stockpile during that year.

2.6 Ore Versus Waste Calculations

Blocks are sorted into ore or waste. Waste may have different handling requirements, depending on the Category. The sorting of the ore and waste Categories is based on the following steps:

- Ore: Based on a particular contained metals value. Because metal prices are set low in the modeling, this may go lower during mining (i.e., waste rock could become ore depending on the cutoff used for metals content).
- Waste rock, Category 4: All of the Virginia Formation, large sedimentary inclusions, and all Duluth Complex waste rock with greater than 0.6% sulfur.
- Waste rock, Category 2/3: Duluth Complex waste rock only, with less than or equal to 0.6% sulfur and greater than 0.12% sulfur.

- Waste rock, Category 1: Duluth Complex waste rock only, with less than or equal to 0.12% sulfur.

2.7 Waste Categorization Sample Comparison

Waste characterization samples were selected from NorthMet drill core in 2005 based on knowledge at that time of the expected categorization of rock. Because sulfur is the main factor in determining rock disposition it is worth comparing these categorizations and their effect.

Table 2-2 below shows the sulfur values for raw drill core from the NorthMet database, values for the samples used in humidity cell tests, and the values for rock stockpiles defined by the results of these tests. Testing focused on the material with the widest range of compositions, hence the lower percentage of testing in the lowest sulfur rocks. It is important to note that the humidity cell test results are used in conjunction with extensive testing from Minnesota Department of Natural Resources and samples chosen are well grounded in the overall geology of the deposit. The match is quite good.

Table 2-2 Sulfur Values in Waste Rock Category Data Sets[1]

		Category 1	Category 2	Category 3	Category 4	Category 4 Virginia Formation
Stockpiles – Block Data	% of Rock	70.33	23.80	3.07	1.00	1.80
	Min % S	0.01	0.13	0.32	0.61	0.33
	Avg % S	0.06	0.18	0.42	0.93	2.43
	Max % S	0.12	0.31	0.60	3.04	4.94
Humidity Cell Tests (2005 on)[2]	Number of Samples	38	16	9	16	3
	Min % S	0.02	0.14	0.32	0.68	2.00
	Avg % S	0.05	0.20	0.44	1.44	3.82
	Max % S	0.12	0.30	0.59	4.46	5.68
Drill Core Database (2011)	Number of Samples	16,127	4,389	1,656	1,429	1,260
	% of Samples	64.9	17.7	6.7	5.7	5.1
	Min % S	0.01	0.13	0.32	0.61	0.01
	Avg % S	0.05	0.2	0.43	1.5	1.67
	Max % S	0.12	0.31	0.60	7.93	8.29

Note that drill data is not composited (i.e., not length-weighted).
Humidity cell tests results shown do not include duplicate samples.

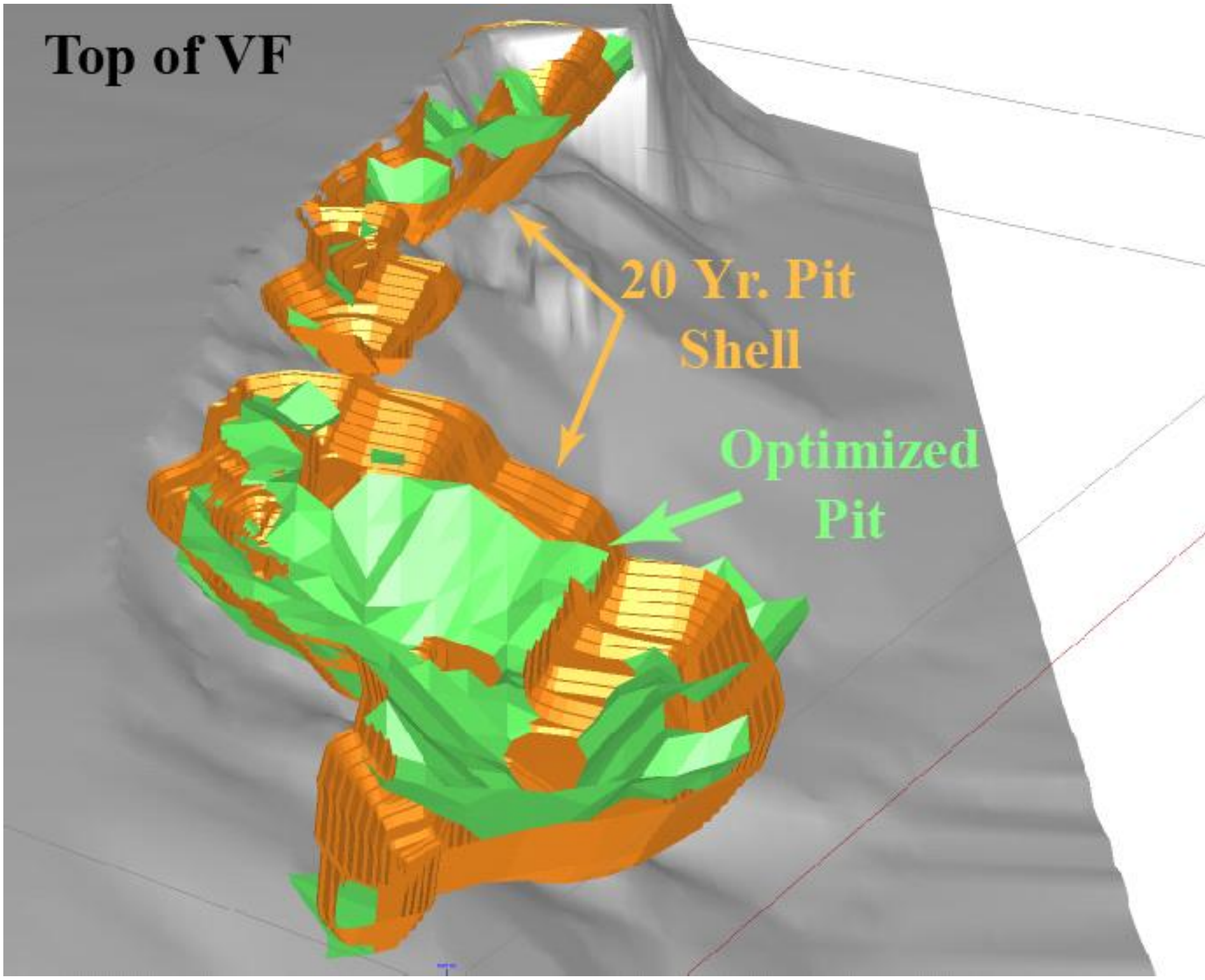


Figure 2-1 Twenty Year Pit Design Built around Optimized Shell
(View looking E-NE, Gray = top of Virginia Formation, Green = Optimized pit shell, Tan / Orange = Pit Design)

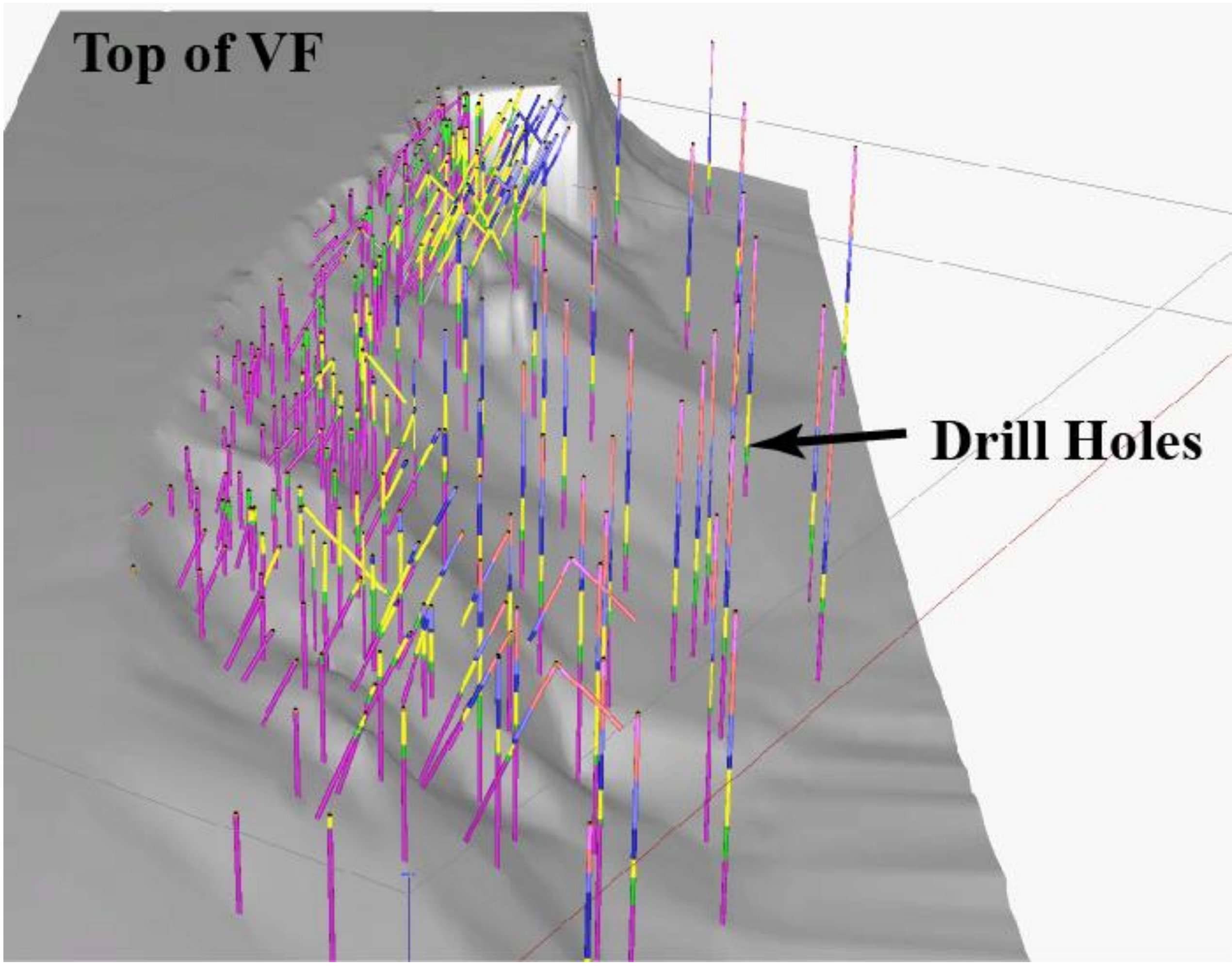


Figure 2-2 Top of Virginia Formation (gray) and Drill Holes Coded by Geologic Unit
(from bottom up, magenta = Unit 1, green = Unit 2, yellow = Unit 3, dark blue = Unit 4, light blue = Unit 5, pinkish-orange = Unit 6, light magenta = Unit 7. View is to ENE.)

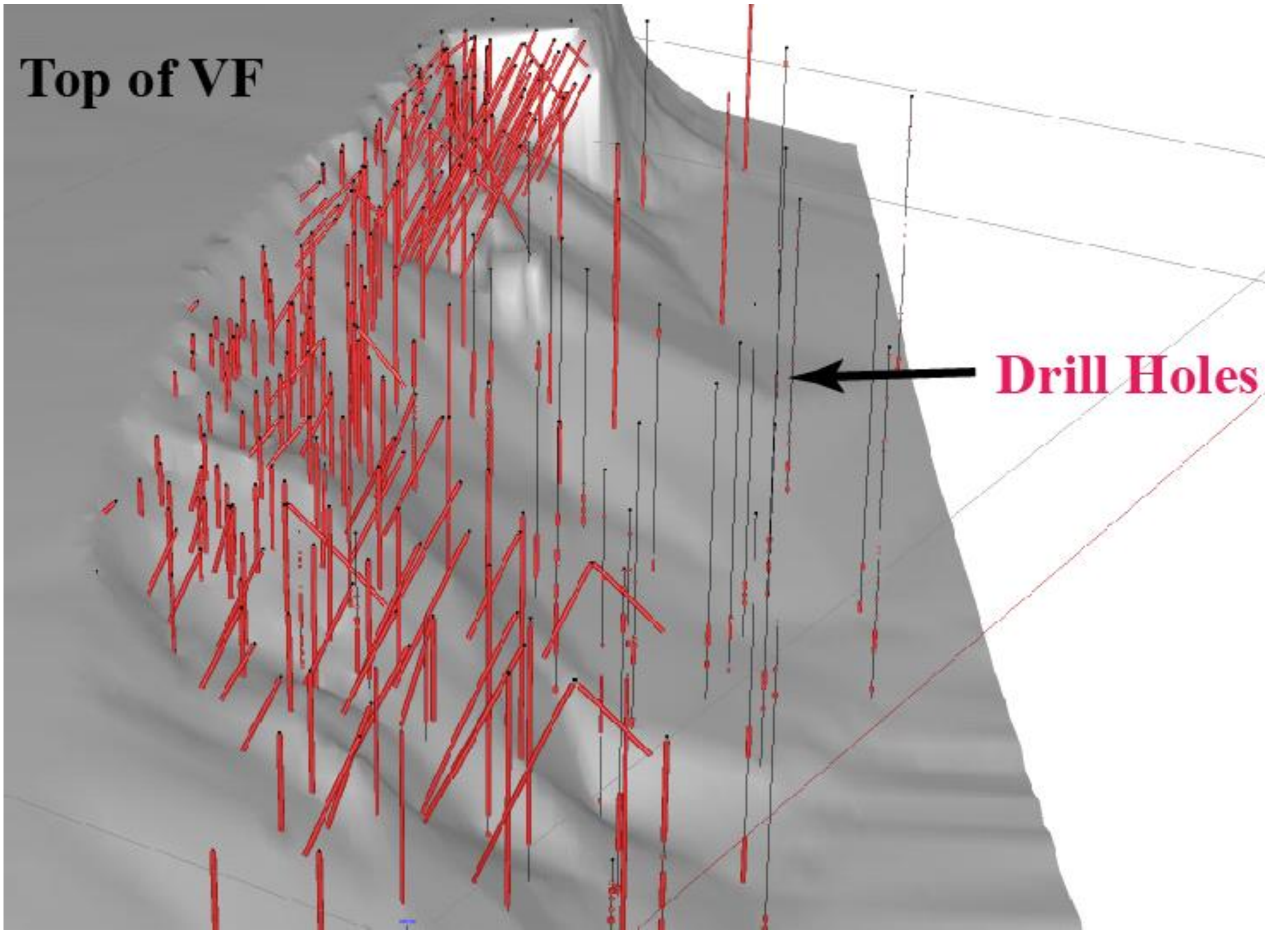


Figure 2-3 Top of Virginia Formation (gray) and Drill Holes Coded by Sampling
(Red drill hole trace = sampled. View is to E-NE.)

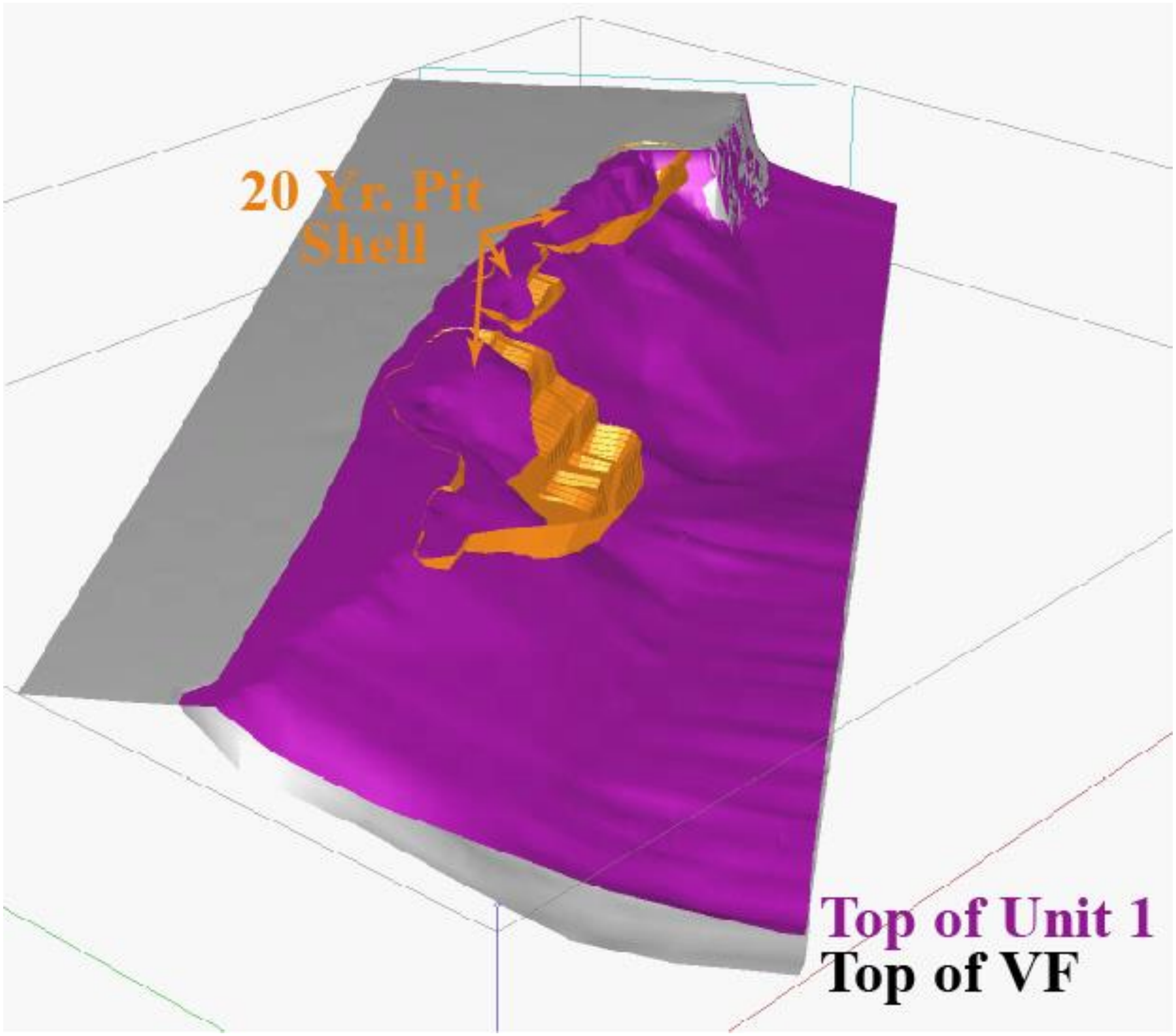


Figure 2-4 Example of Model Surfaces: Virginia Formation, Unit 1, and 20 year pit

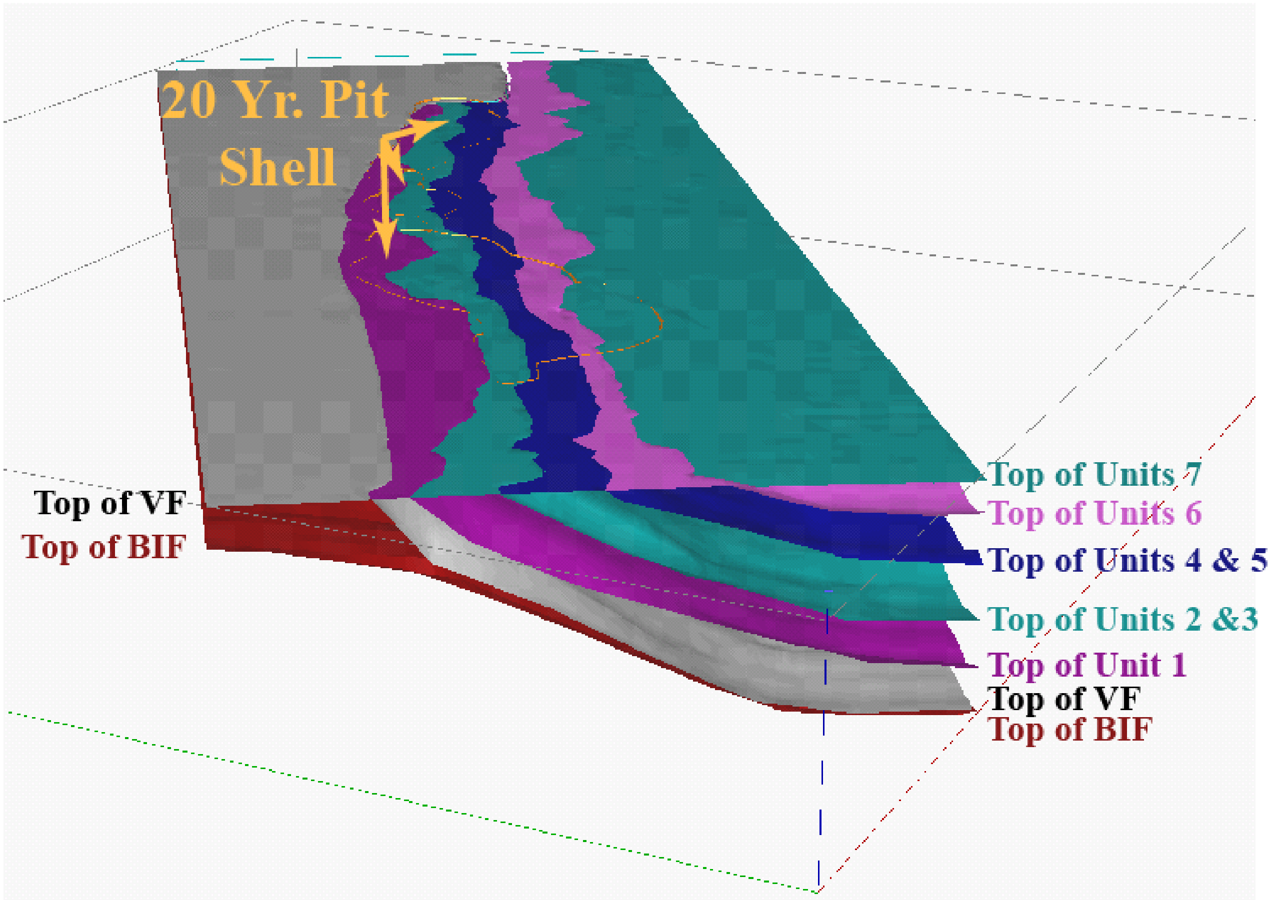


Figure 2-5 Example of Modeled Surfaces: All Geology

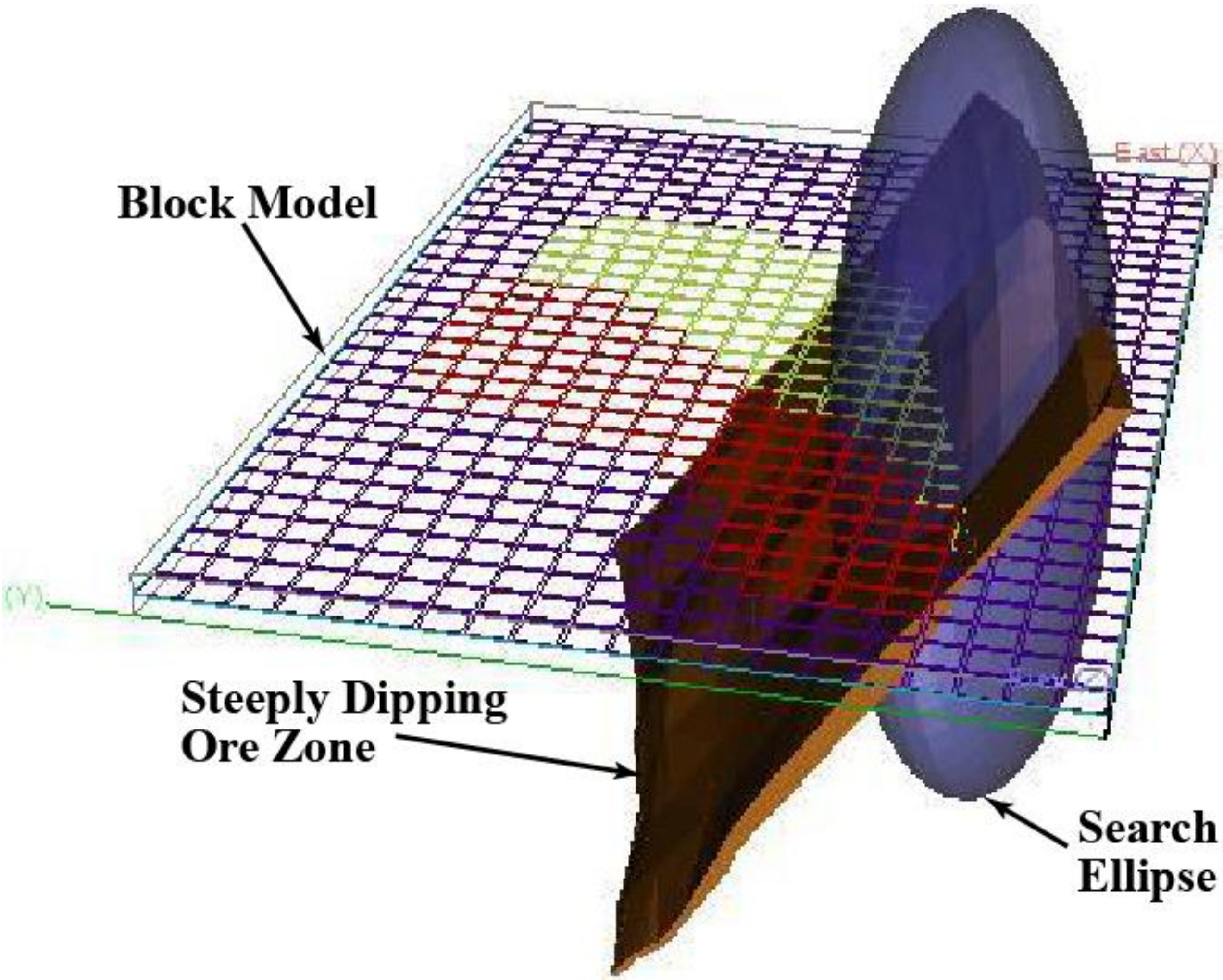


Figure 2-6 Example of Search Ellipse and a Relation to Project Geometry
(not from NorthMet)

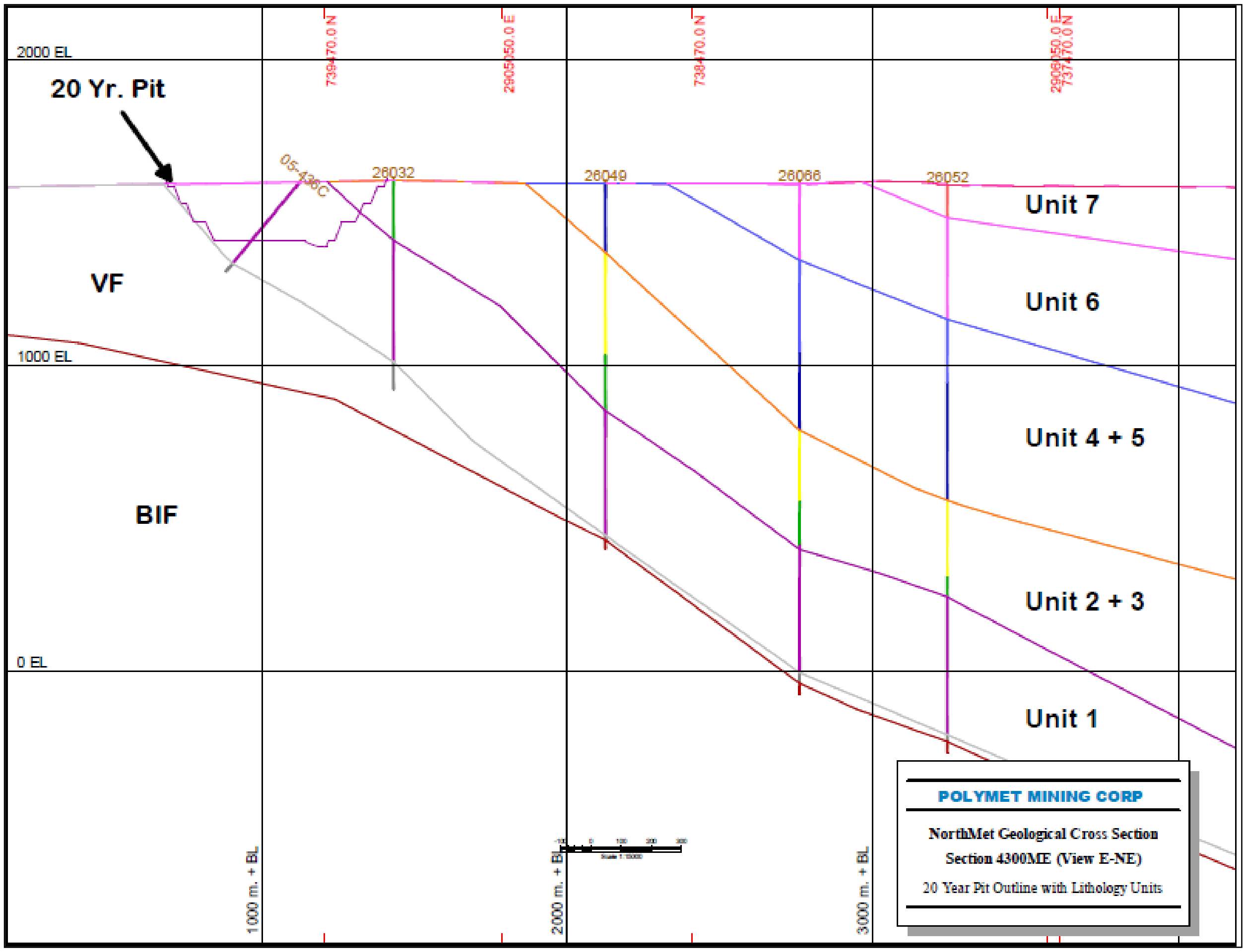


Figure 2-7 NorthMet Geological Cross-Section
(View to E-NE. Note 20 year pit.)

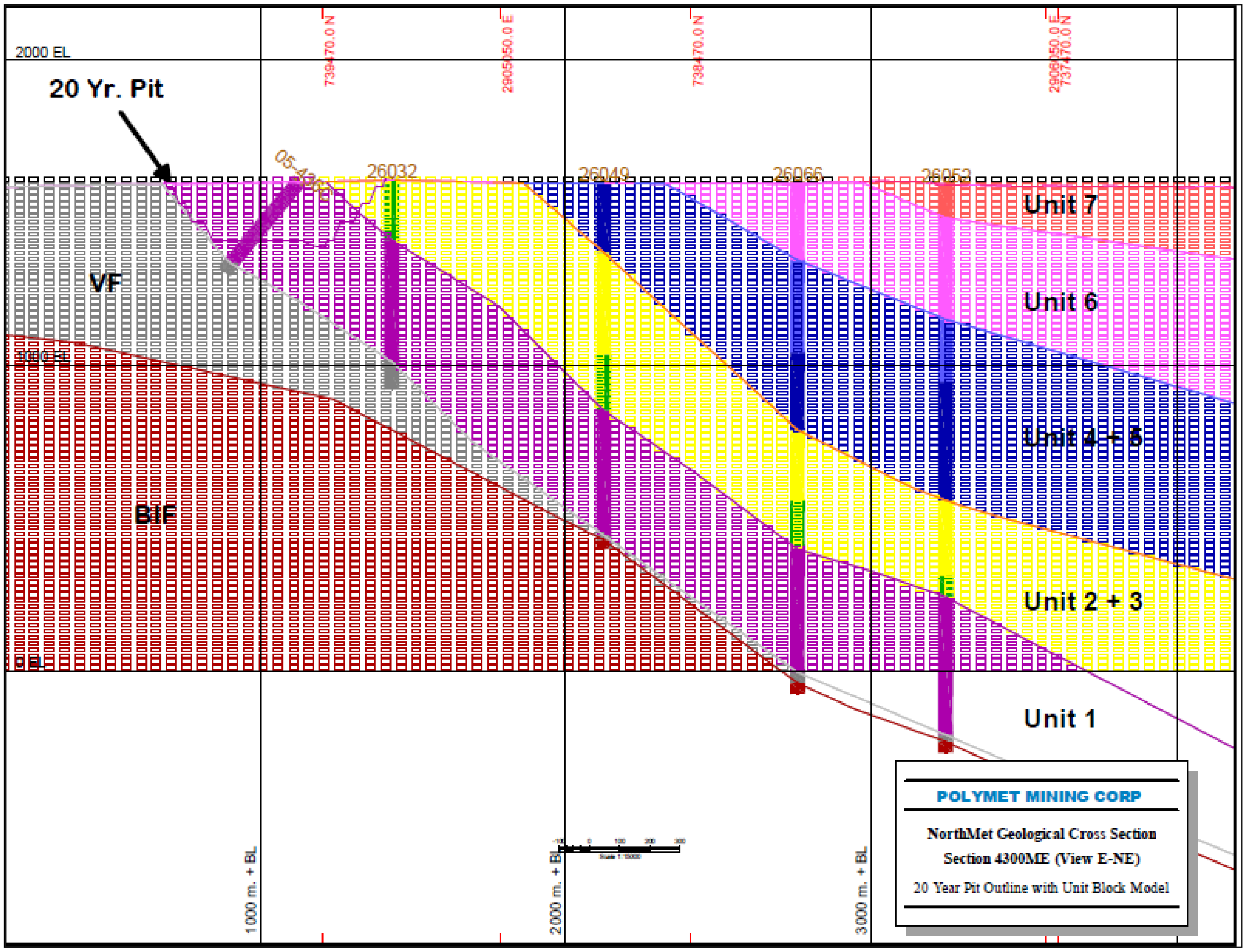


Figure 2-8 NorthMet Geological Cross-Section Showing Unit Block Model
(View to E-NE. Note 20 year pit.)

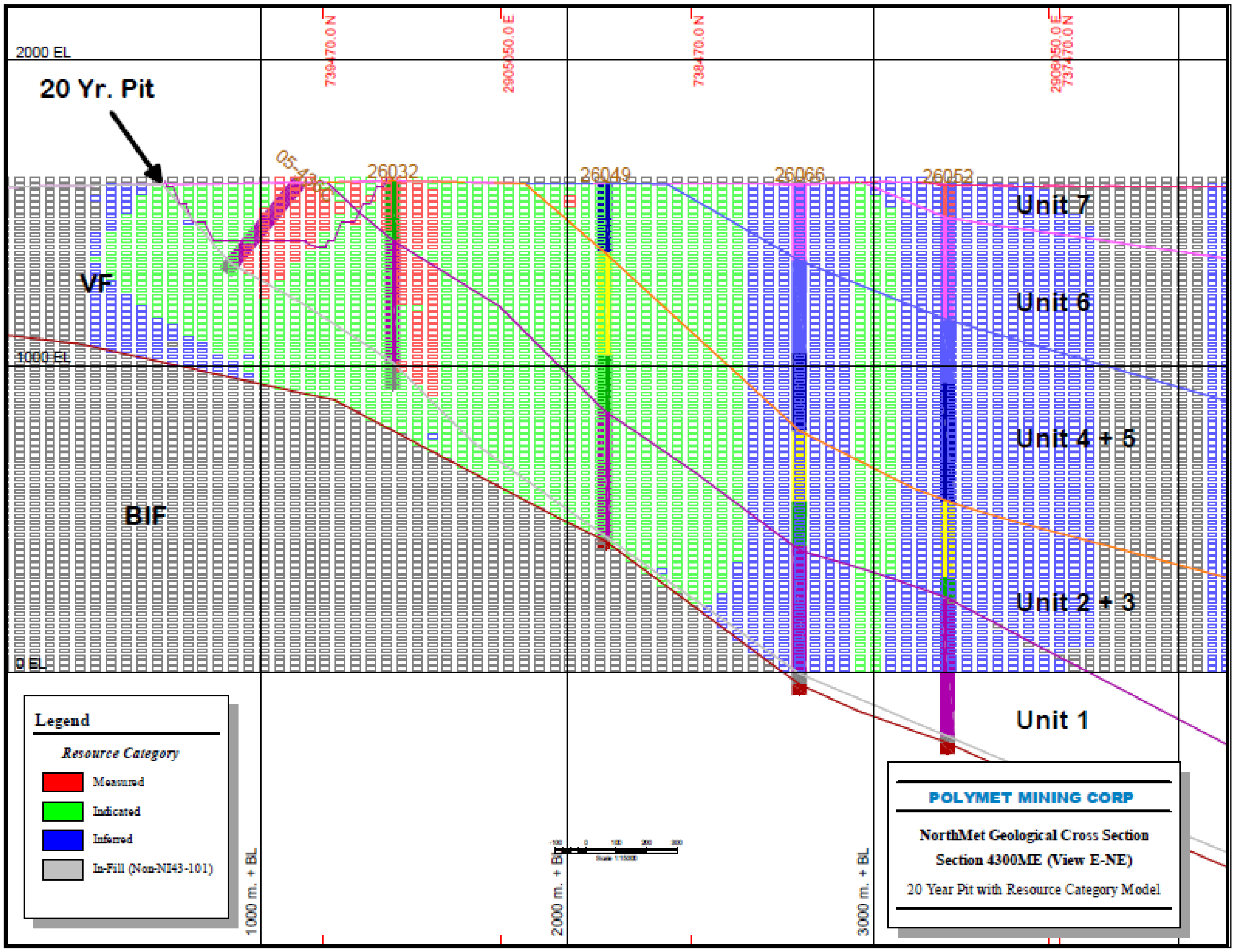


Figure 2-9 NorthMet Block Model Resource Categories Superimposed on Geologic Section (Magenta = Measured, red = indicated, yellow = inferred, blue = in-fill. Note 20 year pit.)

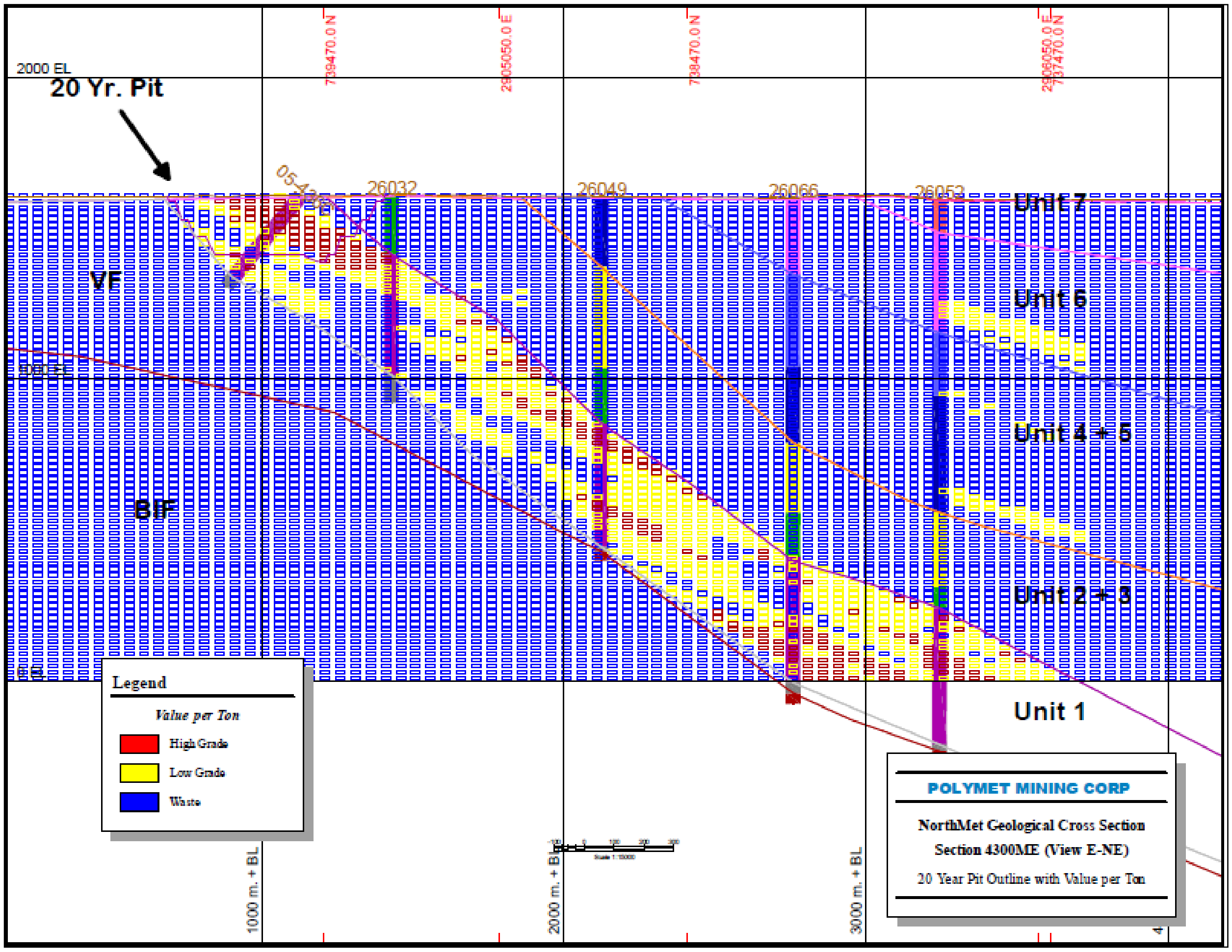


Figure 2-10 NorthMet Grade Categories Superimposed on Geologic Section
(Magenta and red = “ore”, blue = “lean ore”, yellow = “waste rock”. Note 20 year pit.)

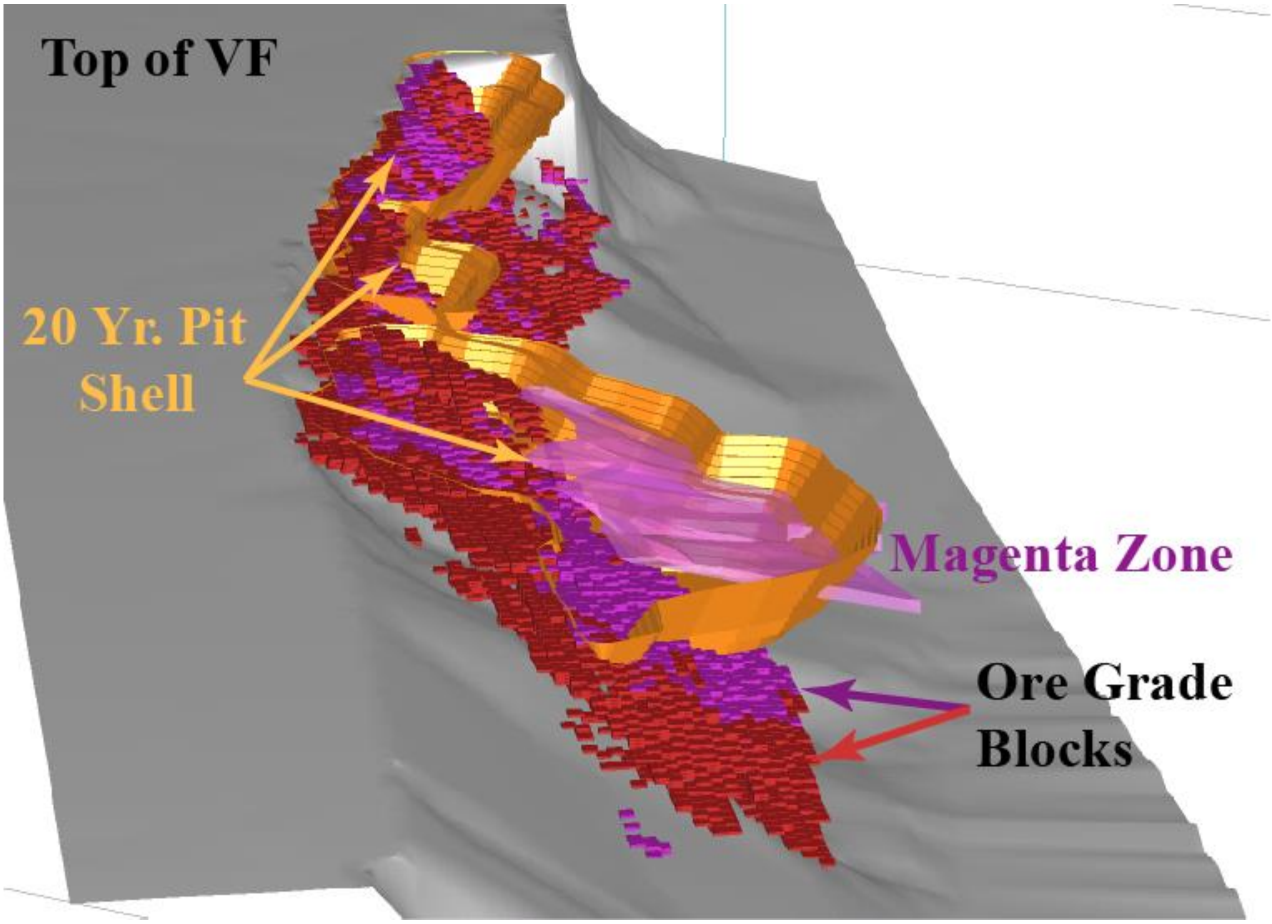


Figure 2-11 Top of Virginia Formation, Unit 1 blocks of “Ore” Grade, 20 Year Pit, and Magenta Zone Geological Solid
(View to E-NE.)

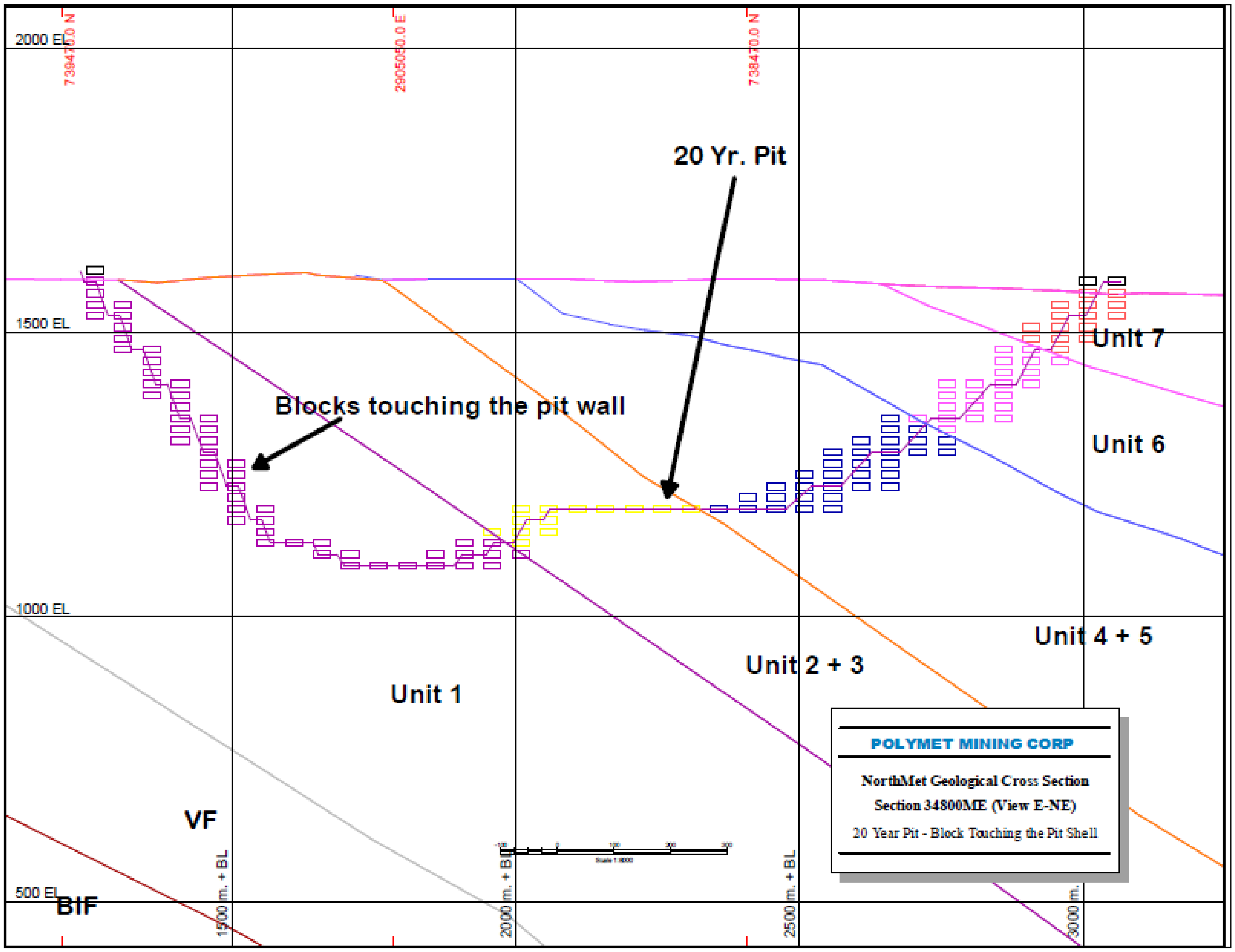


Figure 2-12 Cross-Section Showing Blocks Touching 20 Year Pit
(Note that blocks appearing to not touch pit are touching in the third dimension.)

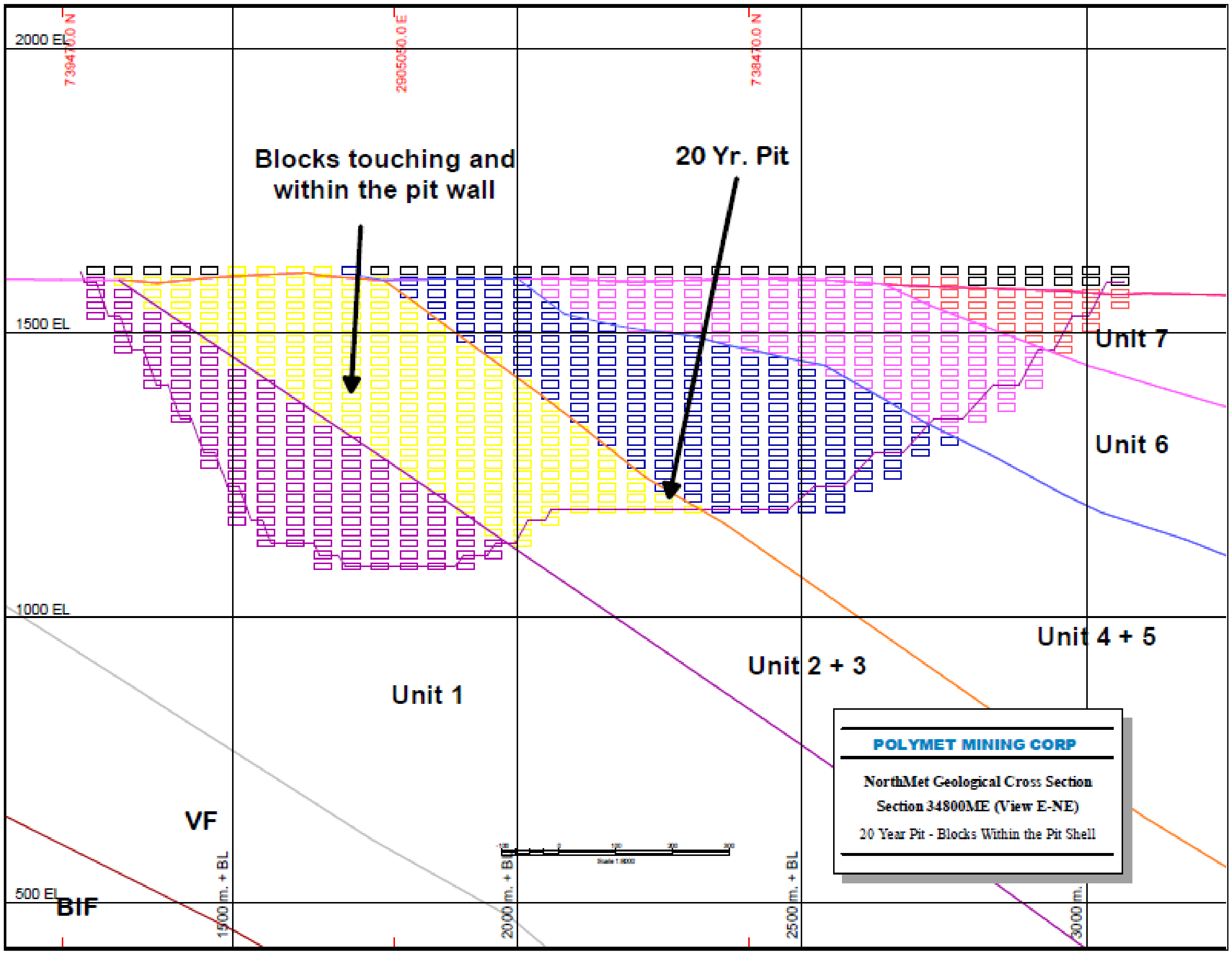


Figure 2-13 Cross-Section Showing Blocks Touching and within 20 Year Pit

Revision History

Date	Version	Description
11/23/11	1	Initial release
11/7/14	2	Update Section 1.0 to clarify the definition of a reserve and to better define pit optimization

References

1. **Canadian Institute of Mining.** Estimation of Minerals Resources and Mineral Reserves, Best Practice Guidelines. 2003.

List of Tables

List of Figures

Attachment B

Stockpile Design Permit Drawings (Partial Submittal)

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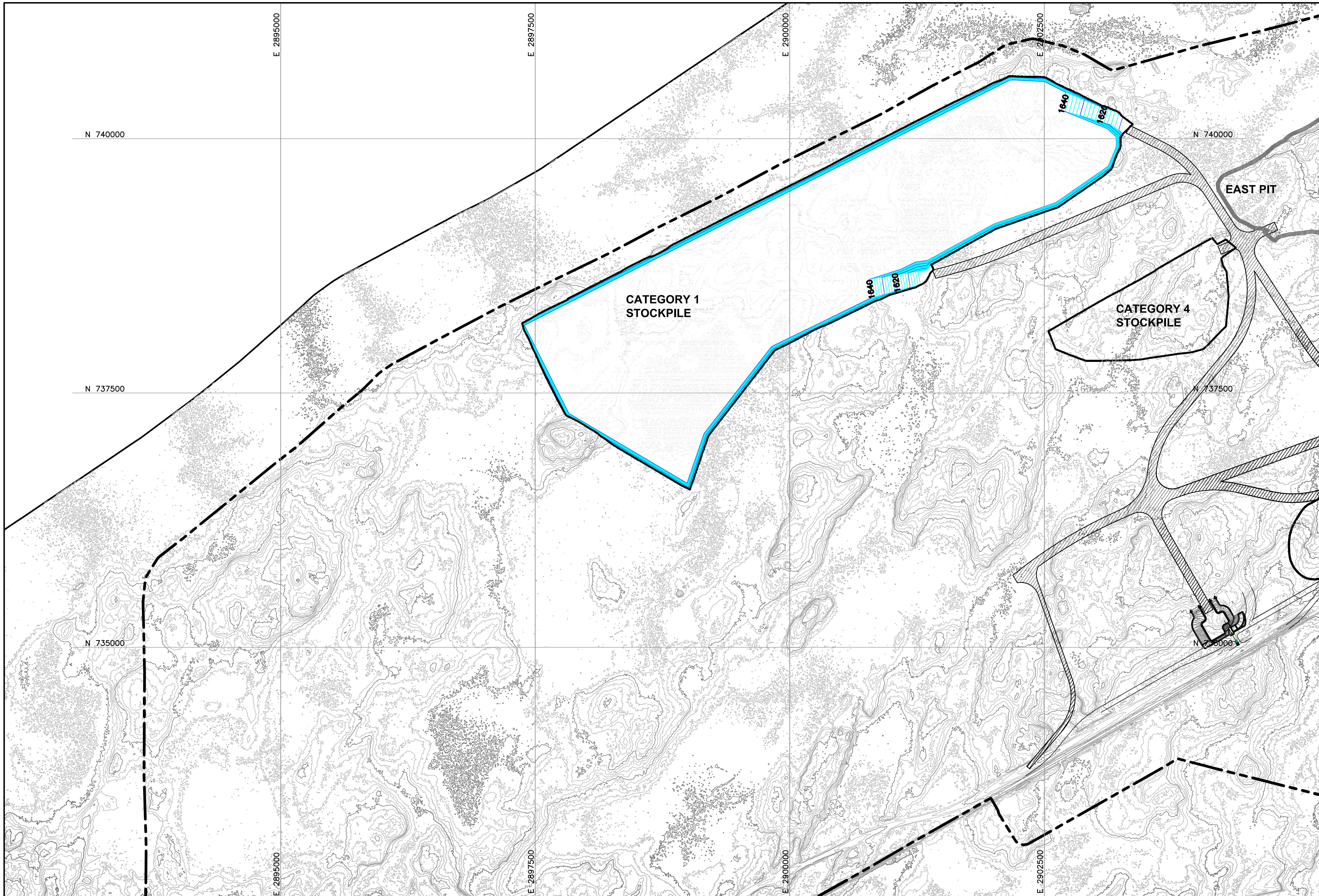

LEGEND

- EXISTING GROUND TOPOGRAPHY
- PROPOSED LAYOUT CONTOURS
- HAUL ROADS
- PROJECT BOUNDARY
- YEAR 1 PIT BOUNDARIES (SEE NOTE 1)
- YEAR 1 ORE, WASTE ROCK STOCKPILE OUTLINES (SEE NOTE 2)

NOTES

1. OPEN PIT AND HAUL ROAD LAYOUTS PROVIDED BY BARR ENGINEERING IN OCTOBER 2011.
2. STOCKPILE EXTENTS PROVIDED BY BARR ENGINEERING IN APRIL 2011 AND MODIFIED BY GOLDER FROM JULY TO OCTOBER 2011.

REFERENCES

1. EXISTING GROUND TOPOGRAPHY PROVIDED BY BARR ENGINEERING, AUGUST 2011.
2. COORDINATE SYSTEM REFERENCE IS NAD83 MINNESOTA STATE PLANE NORTH.
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Golder Associates

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Ph: (303) 980-0540
Fax: (303) 985-2080
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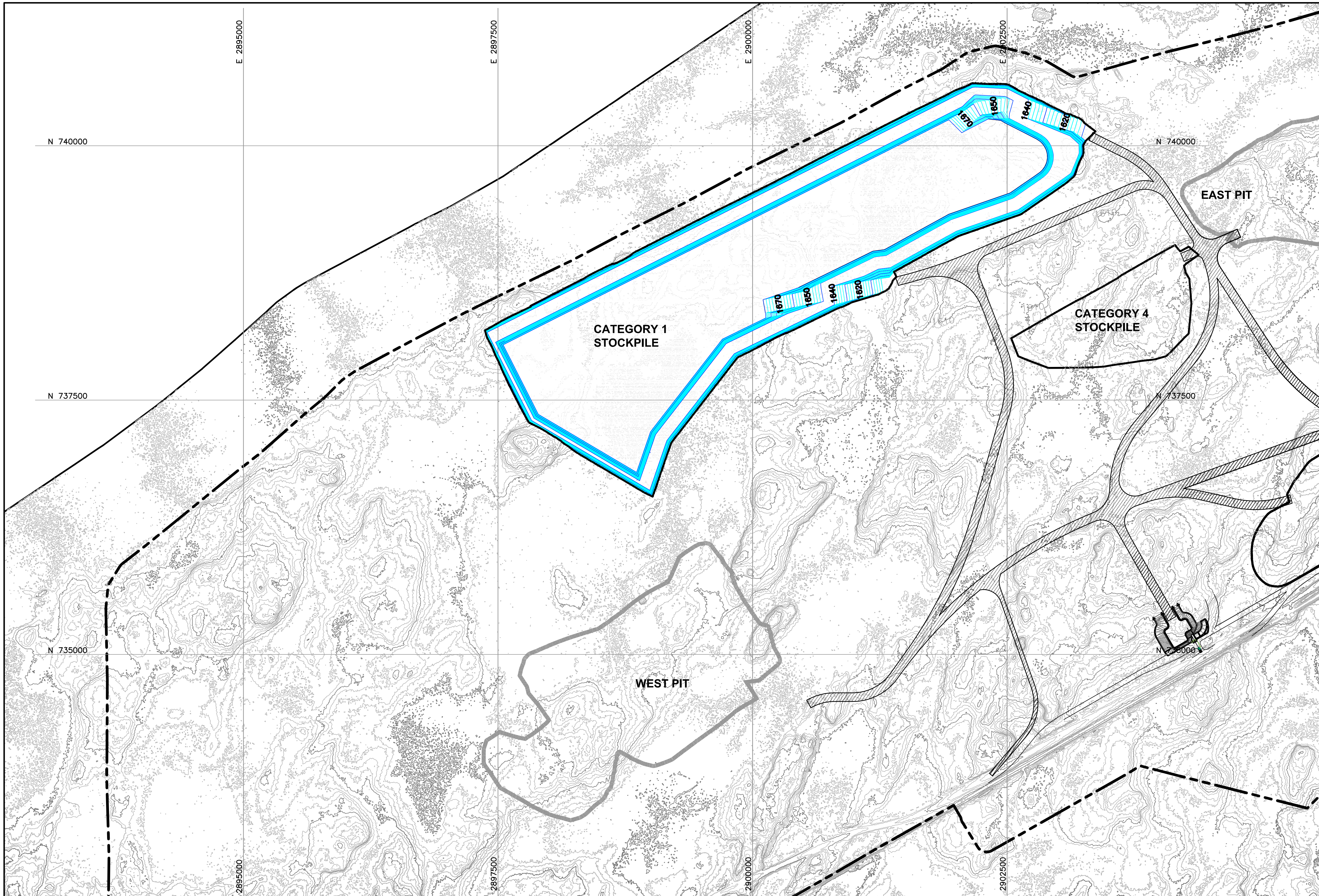

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- YEAR 2 PIT BOUNDARIES (SEE NOTE 1)
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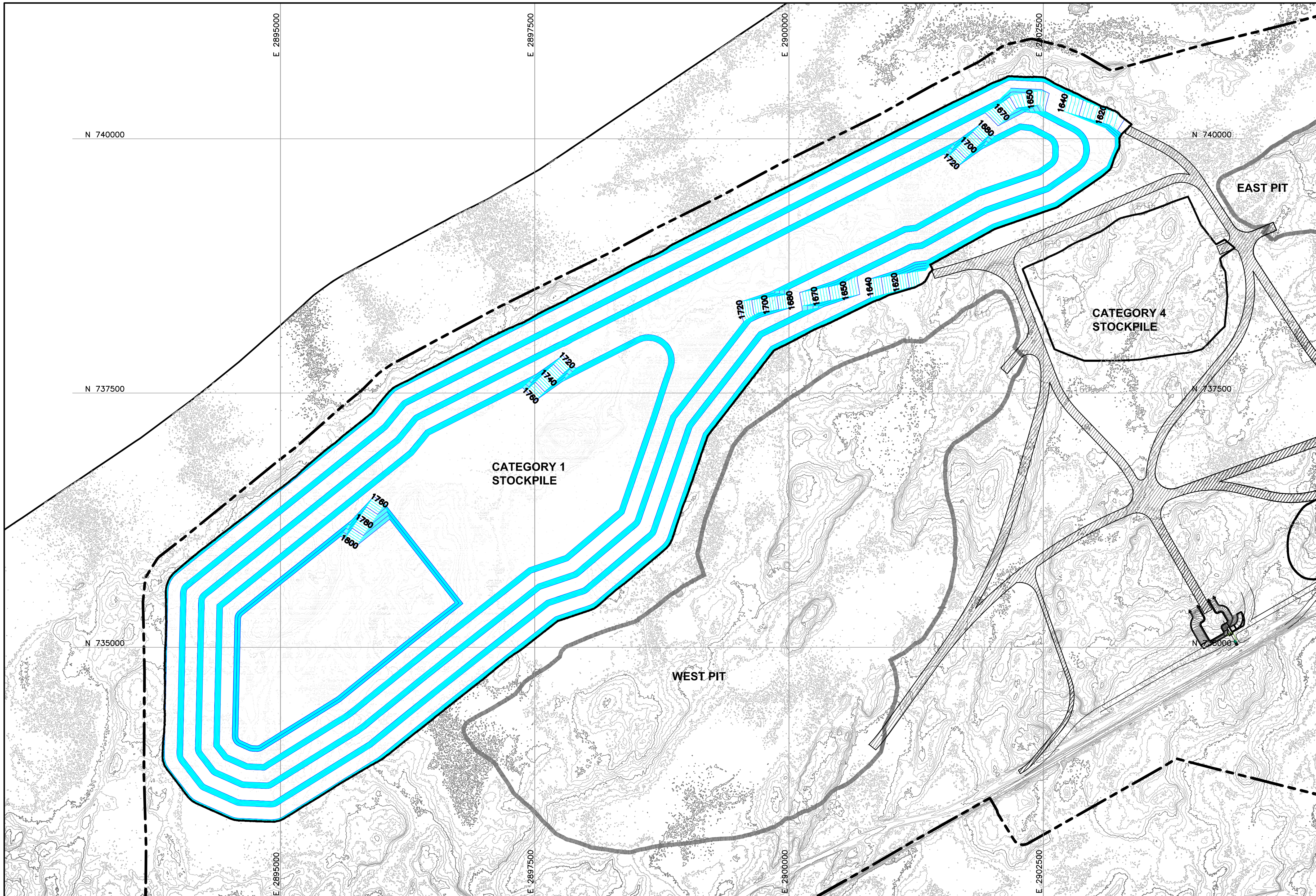

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- EXISTING GROUND TOPOGRAPHY
- PROPOSED LAYOUT CONTOURS
- HAUL ROADS
- PROJECT BOUNDARY
- YEAR 11 PIT BOUNDARIES (SEE NOTE 1)
- YEAR 11 ORE, WASTE ROCK STOCKPILE OUTLINES (SEE NOTE 2)

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GOLDER ASSOCIATES INC.
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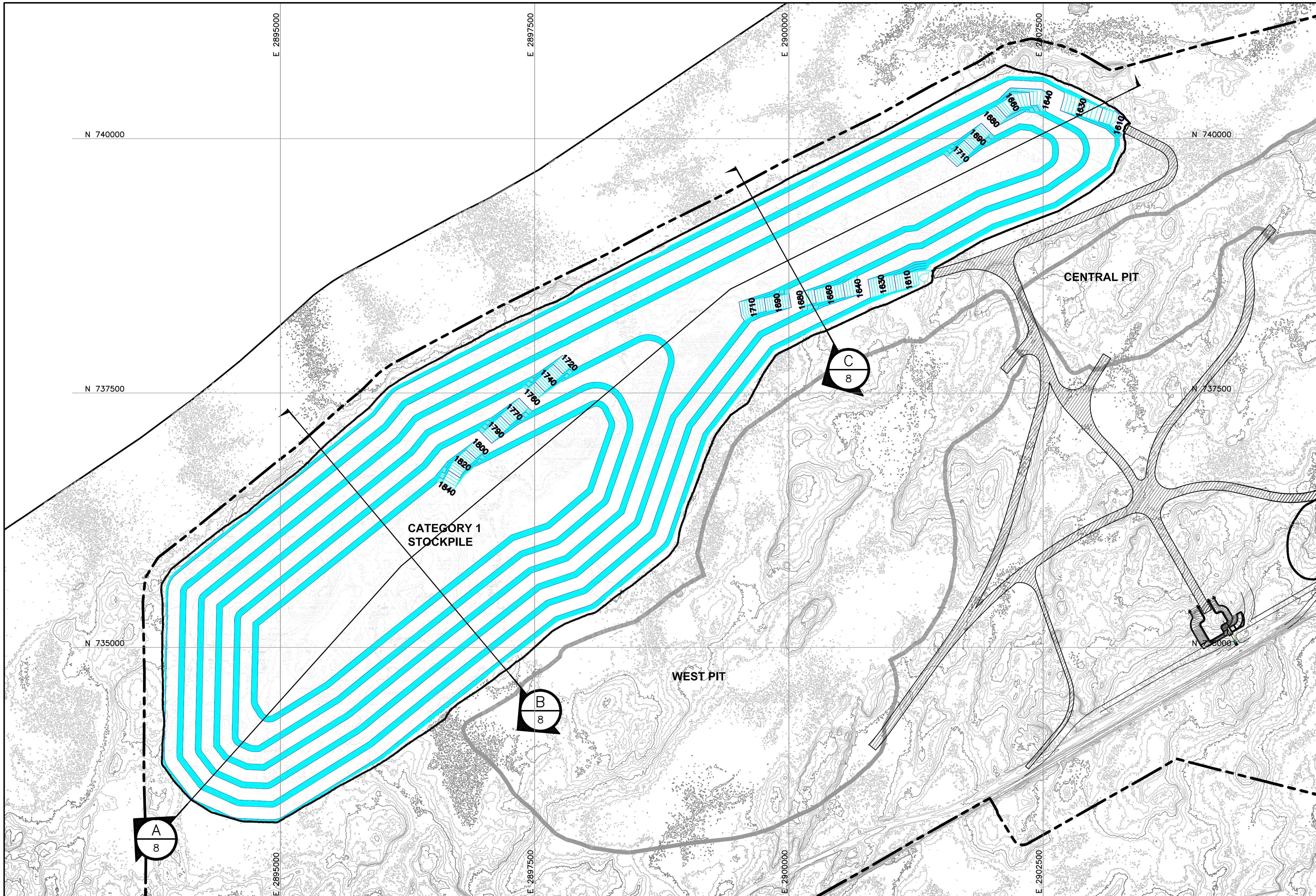

LEGEND

EXISTING GROUND TOPOGRAPHY

PROPOSED LAYOUT CONTOURS

HAUL ROADS

PROJECT BOUNDARY

ULTIMATE PIT BOUNDARIES (SEE NOTE 1)

ULTIMATE WASTE ROCK STOCKPILE OUTLINES (SEE NOTE 2)

CROSS SECTION IDENTIFIER

SHEET WHERE SECTION IS LOCATED

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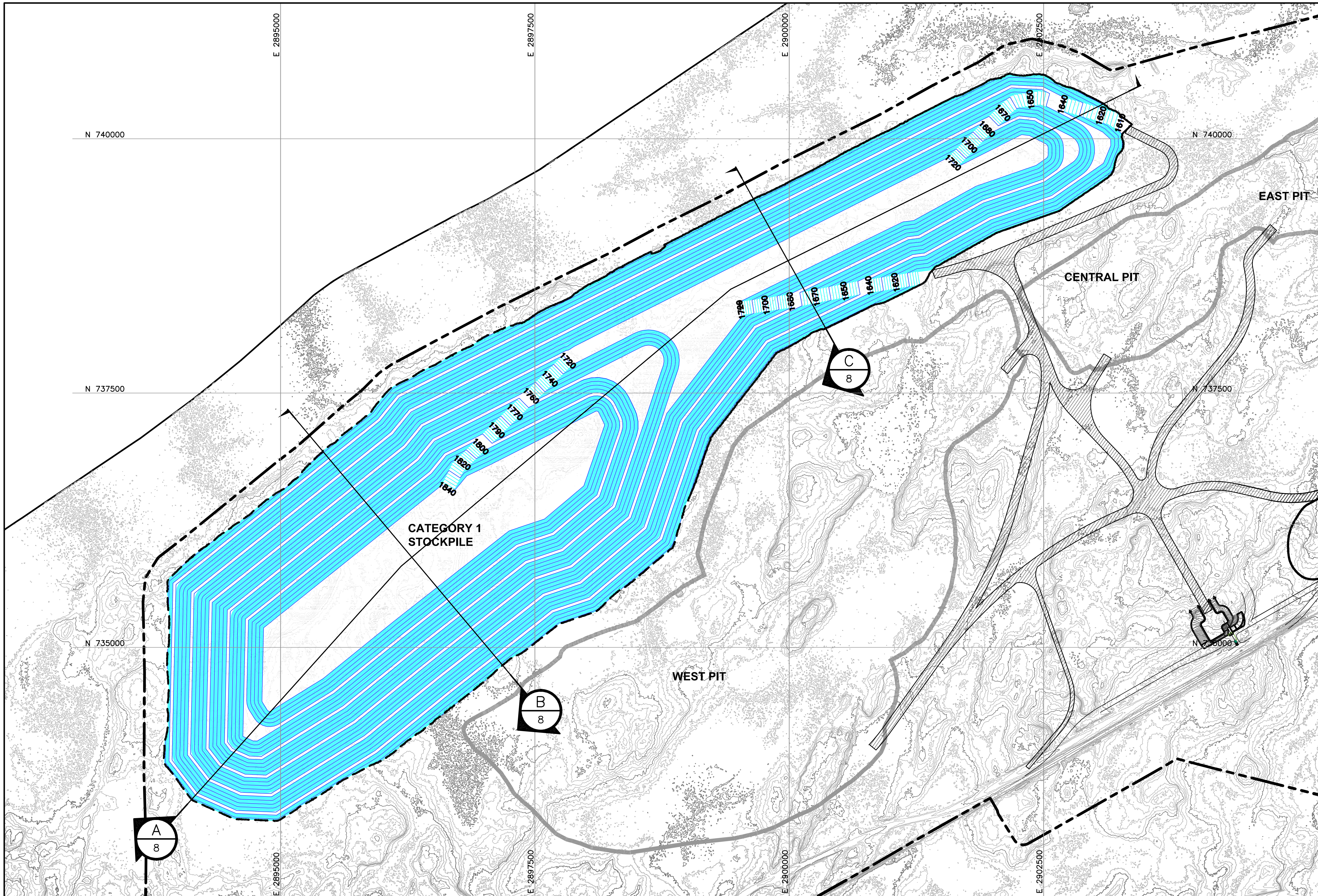

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- PROPOSED LAYOUT CONTOURS
- HAUL ROADS
- PROJECT BOUNDARY
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- YEAR 1 ORE, WASTE ROCK STOCKPILE OUTLINES (SEE NOTE 2)
- ULTIMATE WASTE ROCK STOCKPILE OUTLINES (SEE NOTE 2)
- CROSS SECTION IDENTIFIER
- SHEET WHERE SECTION IS LOCATED

NOTES

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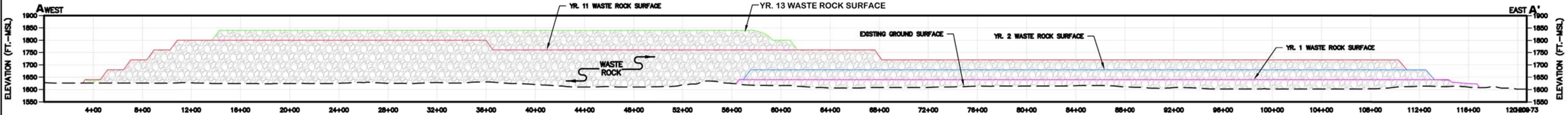
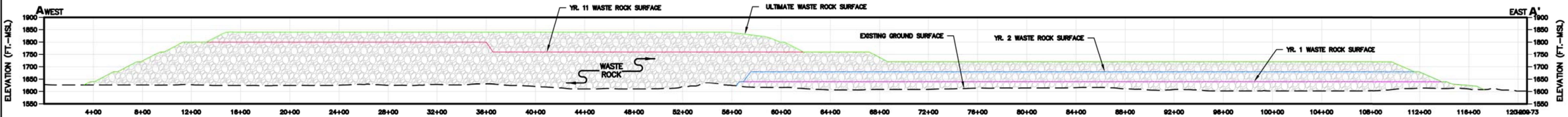
DWG. NO. 7
REV B



A
8
OPERATIONAL CONFIGURATION SECTION
CATEGORY 1 STOCKPILE

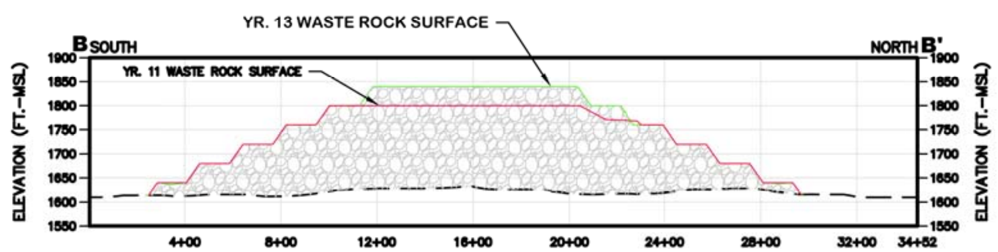
0 400 800
HORIZONTAL SCALE IN FEET
2X VERTICAL EXAGGERATION



A
8
RECLAMATION CONFIGURATION SECTION – INTERBENCH SLOPES 3.75H:1V
CATEGORY 1 STOCKPILE

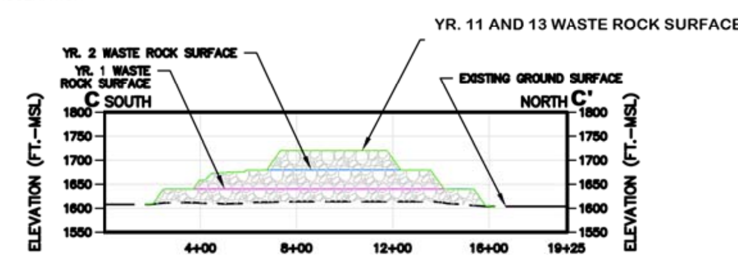
0 400 800
HORIZONTAL SCALE IN FEET
2X VERTICAL EXAGGERATION

NOTE: THE RECLAMATION CONFIGURATION IS SHOWN FOR EACH MINE PLAN FIGURE YEAR FOR ESTIMATION OF CONTINGENCY CLOSURE AND FINANCIAL ASSURANCE.



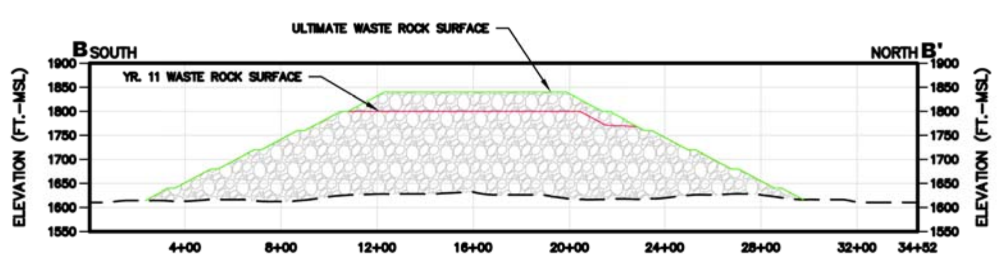
B
8
OPERATIONAL CONFIGURATION – WEST SECTION
CATEGORY 1 STOCKPILE

0 400 800
HORIZONTAL SCALE IN FEET
2X VERTICAL EXAGGERATION



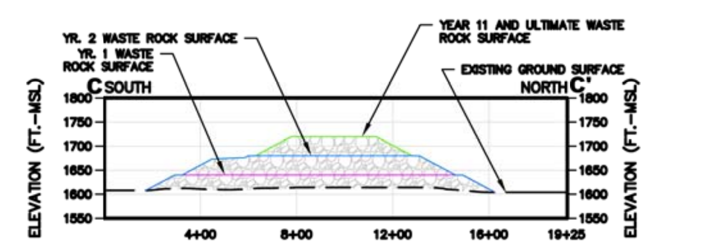
C
8
OPERATIONAL CONFIGURATION – EAST SECTION
CATEGORY 1 STOCKPILE

0 400 800
HORIZONTAL SCALE IN FEET
2X VERTICAL EXAGGERATION



B
8
RECLAMATION CONFIGURATION – WEST SECTION, INTERBENCH SLOPES 3.75H:1V
CATEGORY 1 STOCKPILE

0 400 800
HORIZONTAL SCALE IN FEET
2X VERTICAL EXAGGERATION



C
8
RECLAMATION CONFIGURATION – EAST SECTION, INTERBENCH SLOPES 3.75H:1V
CATEGORY 1 STOCKPILE

0 400 800
HORIZONTAL SCALE IN FEET
2X VERTICAL EXAGGERATION

LEGEND

- YEAR 1 LIMITS
- YEAR 2 LIMITS
- YEAR 11 LIMITS
- YEAR 12, ULTIMATE LIMITS
- EXISTING GROUND SURFACE

DRAFT

0 500 1000
SCALE IN FEET

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VER NO	DATE	DESCRIPTION
A	06/05/12	ISSUED FOR CLIENT REVIEW
B	09/21/12	ISSUED FOR CLIENT REVIEW

DRAWING STATUS		
ISSUED	VERSION	DATE
FOR PERMITTING		
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DATE REG. NO.

DRAWN: MTM 06/05/12
CHECKED: GG 06/05/12
GOLDER PROJECT NO.: 113-2209
SCALE: AS SHOWN

PLANT DRAWING NUMBER:

STOCKPILE CROSS-SECTIONS
CATEGORY 1 STOCKPILE

POLYMET MINING CORPORATION
NORTHMET PROJECT
HOYT LAKES, MINNESOTA

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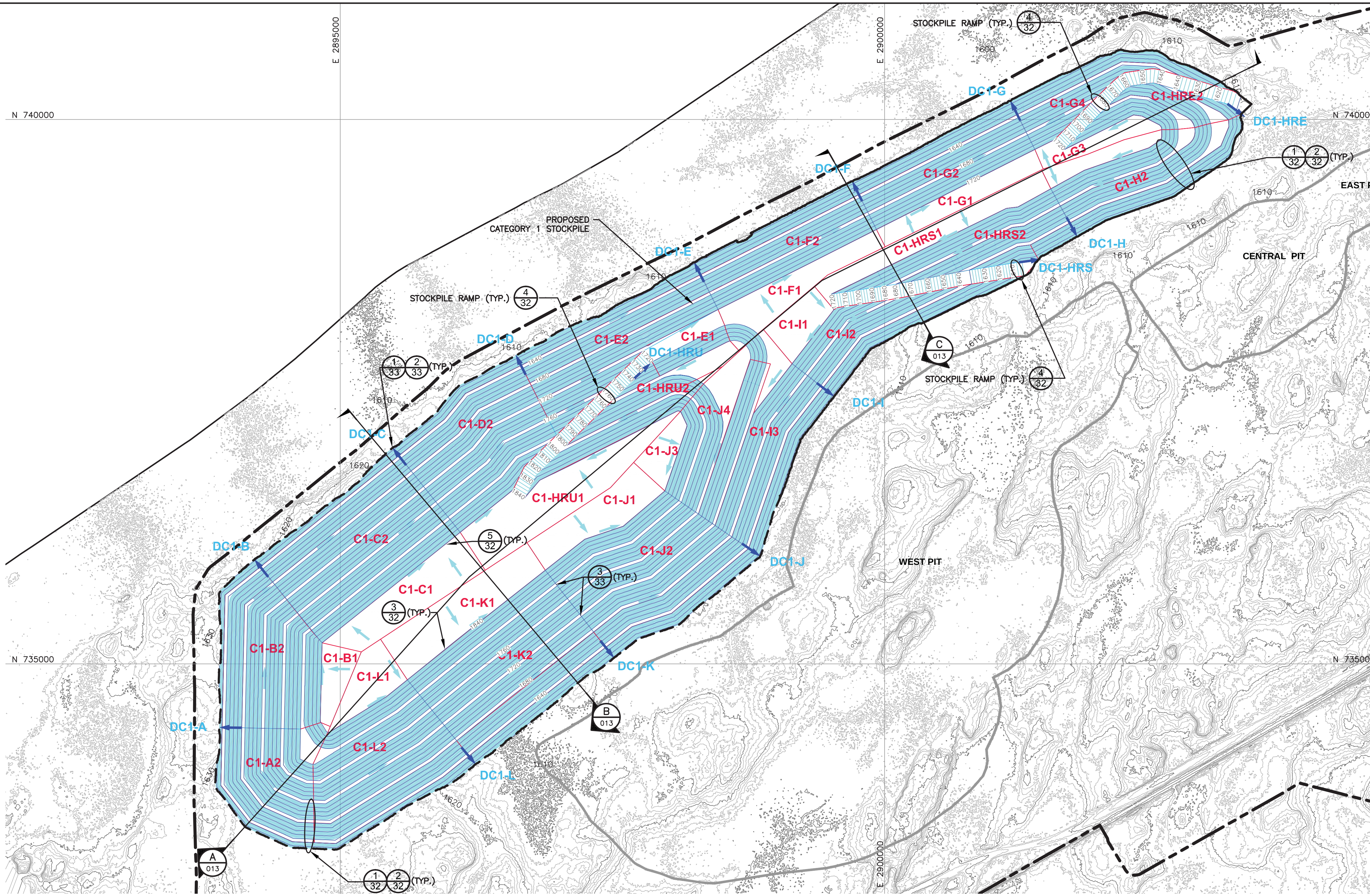
DWG. NO. 8 Project Description Large Figure 13 REV B



LEGEND

- EXISTING GROUND TOPOGRAPHY
- PROPOSED GRADING TOPOGRAPHY
- HAUL ROADS
- MINE SITE BOUNDARY
- PIT BOUNDARIES AT YEAR 2 (SEE NOTE 1)
- YEAR 1 AND 2 ORE, WASTE ROCK STOCKPILE OUTLINES (SEE NOTE 2)
- MAXIMUM WASTE ROCK STOCKPILE OUTLINES (SEE NOTE 2)
- DOWNCHUTE/DRAINAGE DIRECTION
- WATERSHED DIVIDES
- C1-H1 WATERSHED ID
- DOWNCHUTES
- DC1-H DOWNCHUTE ID
- GENERAL DRAINAGE DIRECTION
- CROSS SECTION IDENTIFIER (A / 013)
- SHEET WHERE SECTION IS LOCATED

NOTES

1. OPEN PIT AND HAUL ROAD LAYOUTS PROVIDED BY BARR ENGINEERING IN OCTOBER 2011.
2. STOCKPILE LAYOUTS PROVIDED BY BARR ENGINEERING IN APRIL 2011 AND MODIFIED BY GOLDER.
3. SEE GENERAL NOTES AND LEGEND ON DRAWING 002.

REFERENCES

1. EXISTING GROUND TOPOGRAPHY PROVIDED BY BARR ENGINEERING, AUGUST 2011.
2. COORDINATE SYSTEM REFERENCE IS NAD83 MINNESOTA STATE PLANE NORTH.
3. VERTICAL DATUM REFERENCE IS FEET ABOVE MEAN SEA LEVEL (AMSL).

DRAFT

0 500 1000
SCALE IN FEET

VER NO	DATE	DESCRIPTION
A	12/02/11	ISSUED FOR REVIEW FOR INCLUSION IN ROMP
B	02/15/13	ISSUED FOR REVIEW FOR INCLUSION IN ROMP
C	5/29/13	ISSUED FOR REVIEW FOR INCLUSION IN ROMP
D	1/14/14	ISSUED FOR AGENCY REVIEW

DRAWING STATUS	ISSUED	VERSION	DATE
FOR PERMITTING			
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DATE ____ REG. NO. ____

DRAWN: MTM 10/29/12
CHECKED: GG 10/29/12
GOLDER PROJECT NO.: 113-2209
SCALE: AS SHOWN

PLANT DRAWING NUMBER:

CATEGORY 1 STOCKPILE
FINAL GRADES AND SUB-BASIN DELINEATION

POLYMET MINING INC
NORTHMET PROJECT
HOYT LAKES, MINNESOTA

POLYMET MINING

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Ph: (303) 980-0540
Fax: (303) 985-2080
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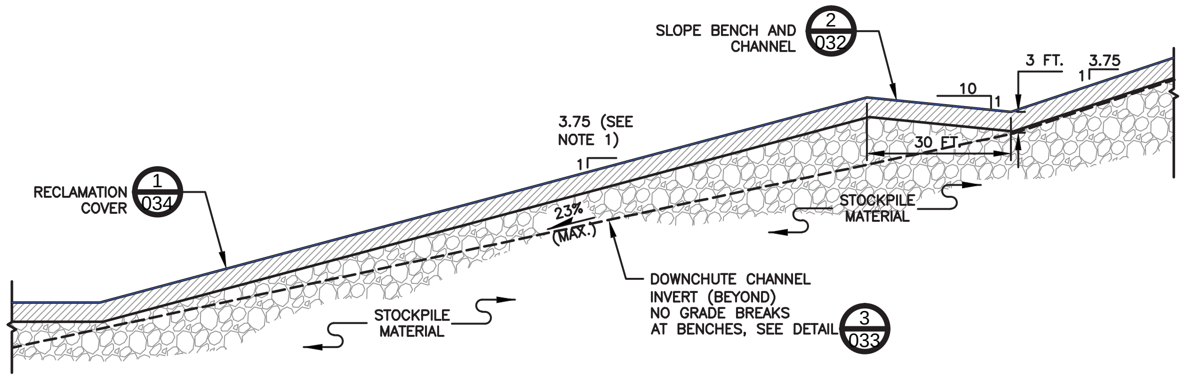
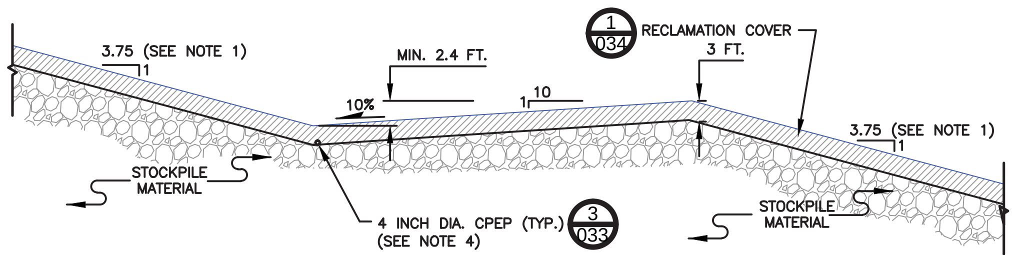
DWG. NO. SKP-012
REV D

CADD USER: Marks, Michele FILE: C:\TAKE HOME\113-2209_H SKP FEB2013\1132209H027.DWG PLOT SCALE: 1:2 PLOT DATE: 1/11/2014 9:38 PM



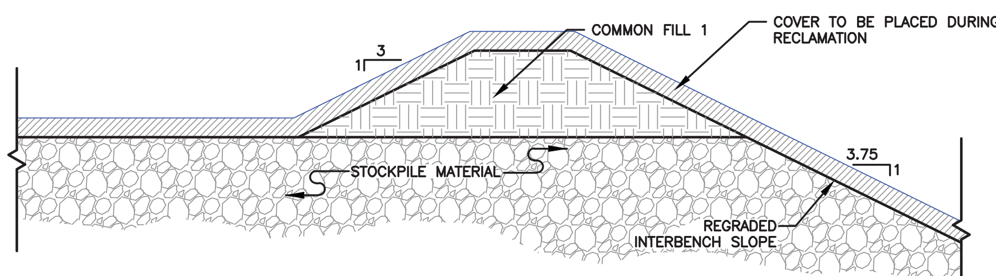
1 / 032 TYPICAL SLOPE AND DOWNCHUTE GRADING DETAIL

N.T.S.



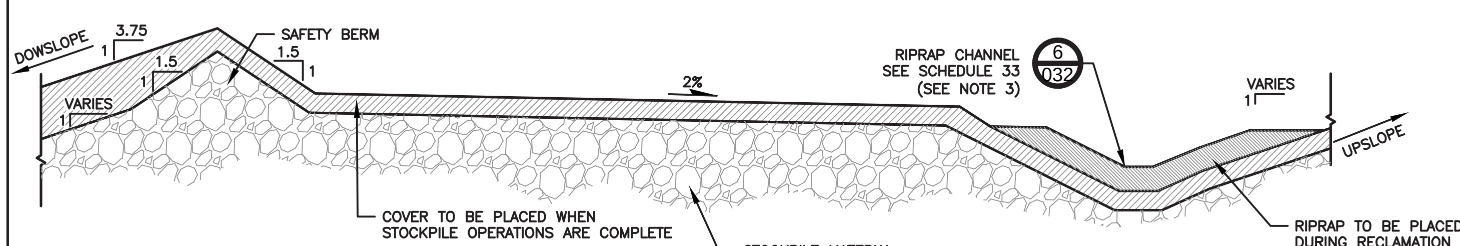
2 / 032 TYPICAL SLOPE BENCH AND CHANNEL RECLAMATION DETAIL

N.T.S.



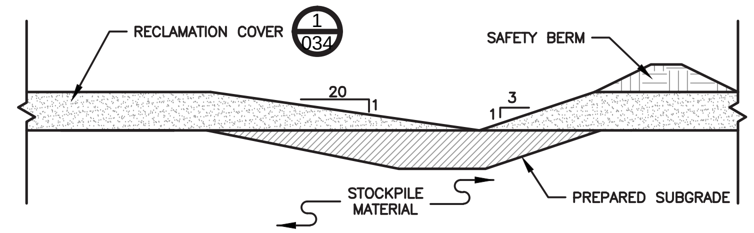
3 / 032 TYPICAL STOCKPILE CREST BERM DETAIL

N.T.S.



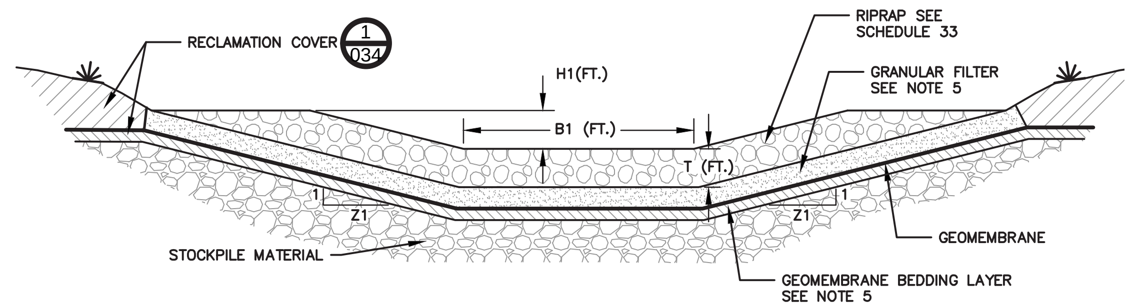
4 / 032 STOCKPILE RAMP TYPICAL DETAIL

N.T.S.



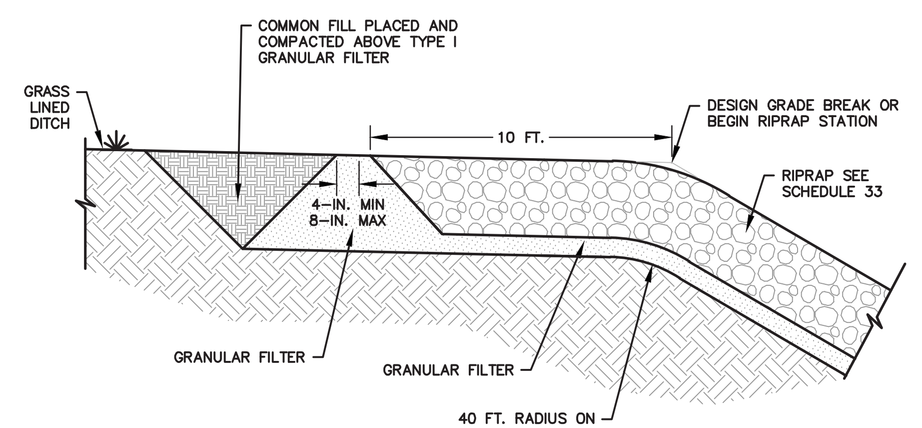
5 / 032 TYPICAL TOP SURFACE CHANNEL SECTION

N.T.S.



6 / 032 TYPICAL RIPRAP-LINED CHANNEL AND DOWNCHUTE

N.T.S.



7 / 032 UPSTREAM END OF RIPRAP CHANNEL

N.T.S.

NOTES

1. THE MAXIMUM SLOPE GRADES ARE 3.75H:1V FOR RECLAIMED STOCKPILE AREAS.
2. ASSUME 1.4H:1V INTERBENCH SLOPES FOR ACTIVE AREAS (EQUAL TO NOMINAL ANGLE OF REPOSE FOR WASTE ROCK MATERIAL). REGRADE PRIOR TO PLACEMENT OF RECLAMATION COVER.
3. SEE SCHEDULE 33 ON DRAWING SKP-033.
4. AT BASE OF COVER SYSTEM GRANULAR DRAINAGE LAYER PLACE DRAIN PIPE AT SLOPE-BENCH INTERSECTION. PIPE TO BE CONTINUOUS ALONG BENCHES BETWEEN DOWNCHUTE CHANNELS.
5. RIPRAP-LINED CHANNEL AND DOWNCHUTE DETAILS REPRESENT PRELIMINARY DESIGNS. DETAILED DIMENSIONS AND TECHNICAL SPECIFICATIONS TO BE PROVIDED PRIOR TO CONSTRUCTION, I.E. AS A PART OF FINAL DESIGN.
6. SEE GENERAL NOTES AND LEGEND ON DRAWING 002.

VER NO	DATE	DESCRIPTION
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C	5/29/13	ISSUED FOR REVIEW FOR INCLUSION IN ROMP
D	1/14/14	ISSUED FOR AGENCY REVIEW

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GOLDER PROJECT NO.: 113-2209
SCALE: AS SHOWN

PLANT DRAWING NUMBER:

RECLAMATION AND OPERATIONS
SURFACE WATER MANAGEMENT DETAILS
SHEET 1 OF 2

POLYMET MINING INC
NORTHMET PROJECT
HOYT LAKES, MINNESOTA

POLYMET MINING

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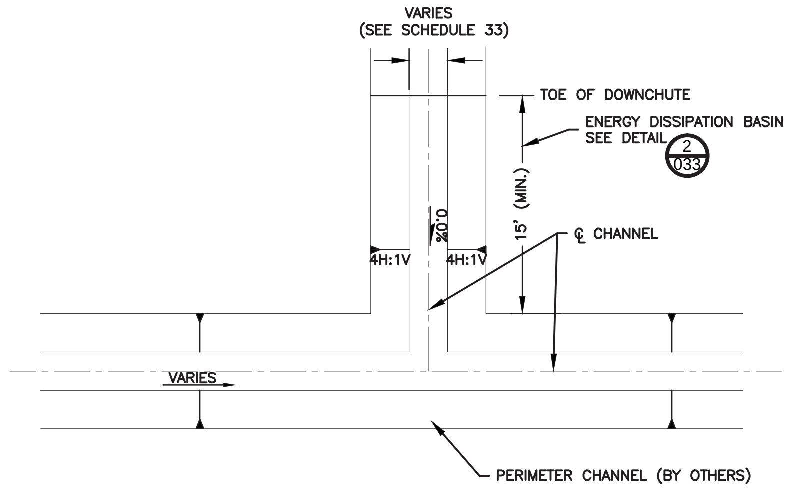
CADD USER: Morks, Michele FILE: N:\1\1\113-2209_H SKP FEB2013\1132209H030.DWG PLOT SCALE: 1:2 PLOT DATE: 1/14/2014 11:11 AM

INCHES 1 2



1/033 DOWNCHUTE CHANNEL CONFLUENCE DETAIL
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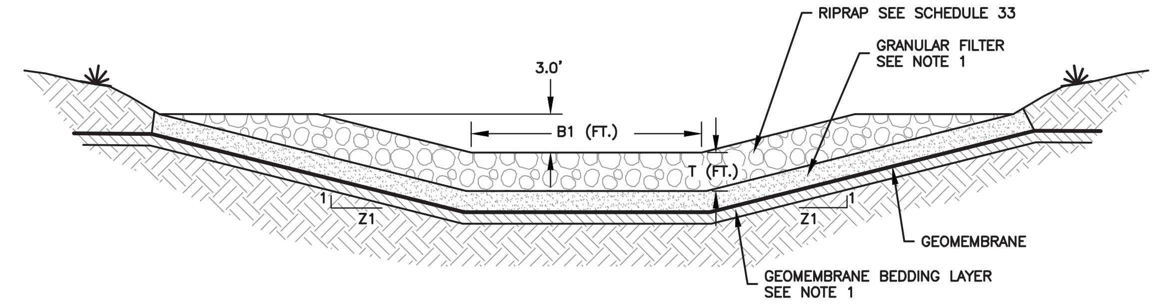
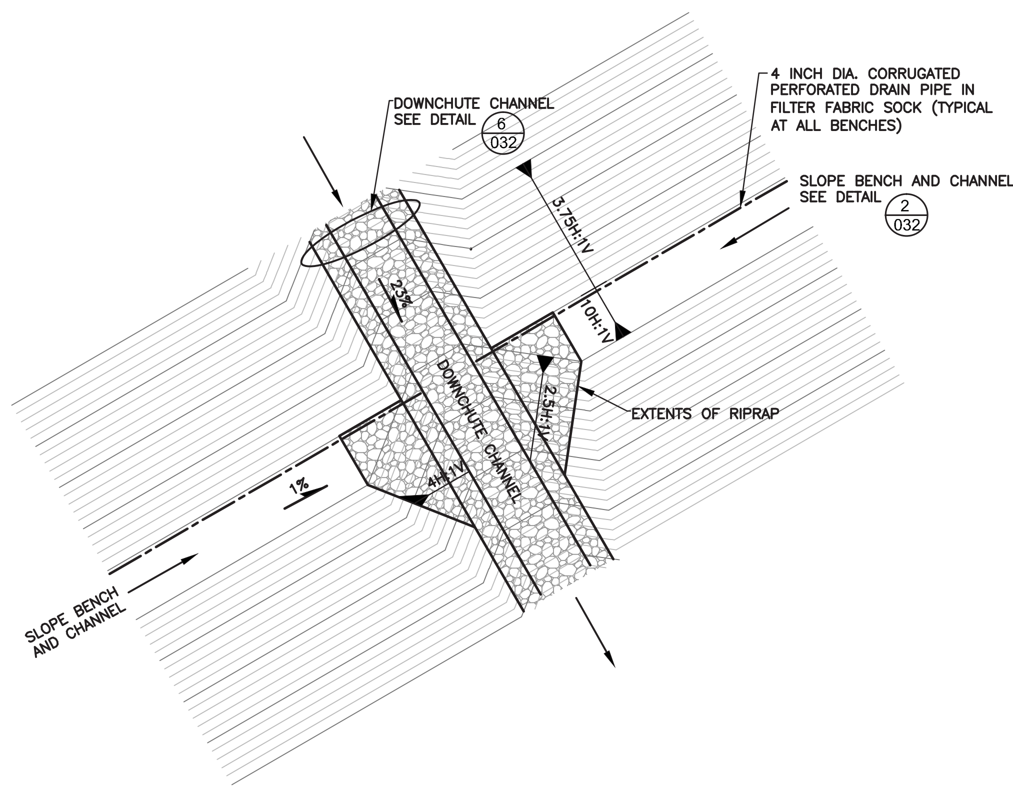


2/033 TYPICAL ENERGY DISSIPATION BASIN (SEE SCHEDULE 33 FOR DIMENSIONS)
N.T.S.

SCHEDULE 33: RIPRAP-LINED CHANNEL DIMENSIONS

CHANNEL ID	BOTTOM WIDTH, B1 (FT)	SIDE SLOPE, Z1 (H:1V)	MIN. DEPTH, H1 (FT)	RIPRAP SIZE, D_{50} (IN)	RIPRAP LAYER THICKNESS, T (FT)	MAX SLOPE, (FT/FT)
DC1-A	20	4	3	12	2	0.23
DC1-B	20	4	3	12	2	0.23
DC1-C	25	4	3	12	2	0.23
DC1-D	20	4	3	12	2	0.23
DC1-E	25	4	3	12	2	0.23
DC1-F	20	4	3	9	1.5	0.23
DC1-G	20	4	3	12	2	0.23
DC1-HRE	8	4	3	9	1.5	0.06
DC1-H	20	4	3	9	1.5	0.23
DC1-HRS	8	4	3	9	1.5	0.06
DC1-HRU	8	4	3	9	1.5	0.07
DC1-I	20	4	3	12	2	0.23
DC1-J	20	4	3	18	3	0.23
DC1-K	25	4	3	12	2	0.23
DC1-L	25	4	3	12	2	0.23



3/033 SLOPE BENCH AND CHANNEL TO DOWNCHUTE TRANSITION
N.T.S.

NOTES
1. ENERGY DISSIPATION BASIN DETAIL REPRESENTS PRELIMINARY DESIGN. DETAILED DIMENSIONS AND TECHNICAL SPECIFICATIONS TO BE PROVIDED PRIOR TO CONSTRUCTION, I.E. AS A PART OF FINAL DESIGN.
2. SEE GENERAL NOTES AND LEGEND ON DRAWING 002.

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D	1/14/14	ISSUED FOR AGENCY REVIEW

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ISSUED	VERSION	DATE
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GOLDER PROJECT NO.: 113-2209
SCALE: AS SHOWN

PLANT DRAWING NUMBER:

RECLAMATION AND OPERATIONS
SURFACE WATER MANAGEMENT DETAILS
SHEET 2 OF 2

POLYMET MINING INC
NORTHMET PROJECT
HOYT LAKES, MINNESOTA

POLYMET MINING

Golder Associates

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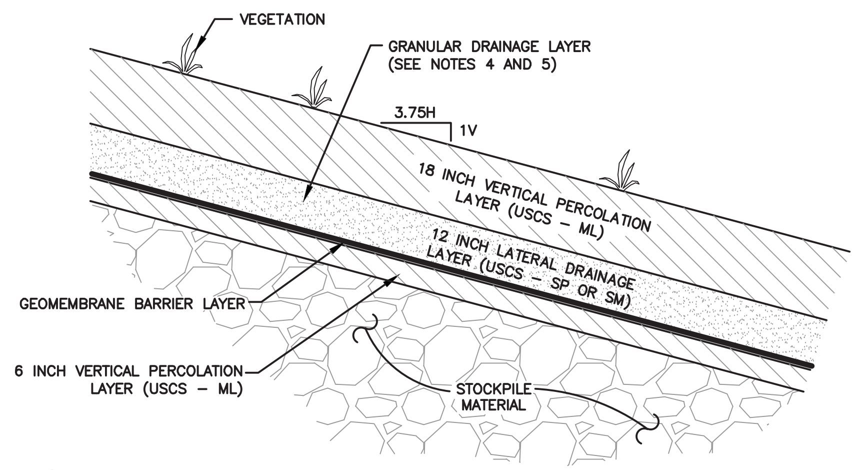
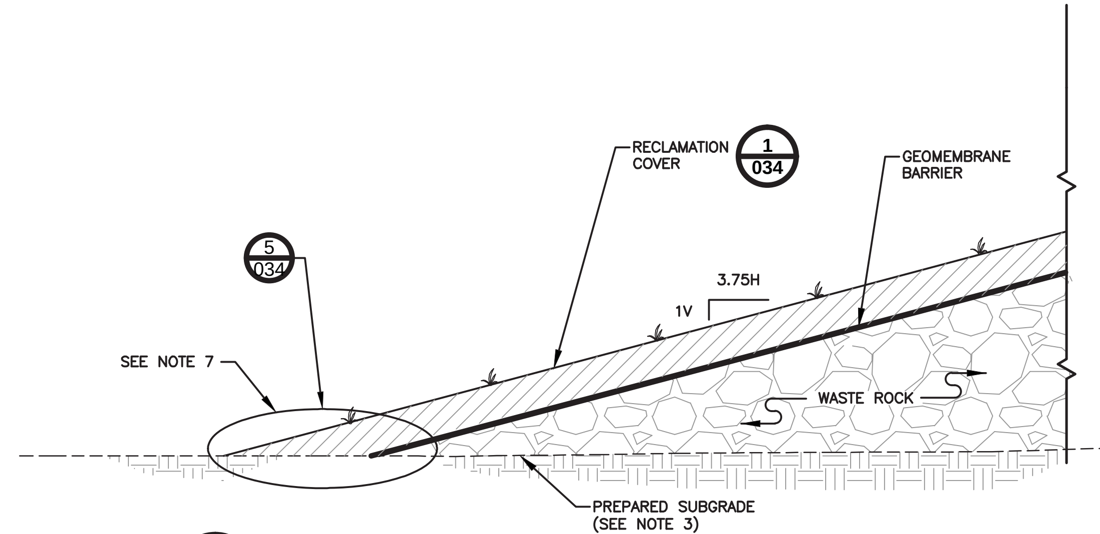
REV D



1/034 TYPICAL CATEGORY 1 RECLAMATION COVER DETAIL
N.T.S.



2/034 CATEGORY 1 RECLAMATION COVER DESIGN SECTION
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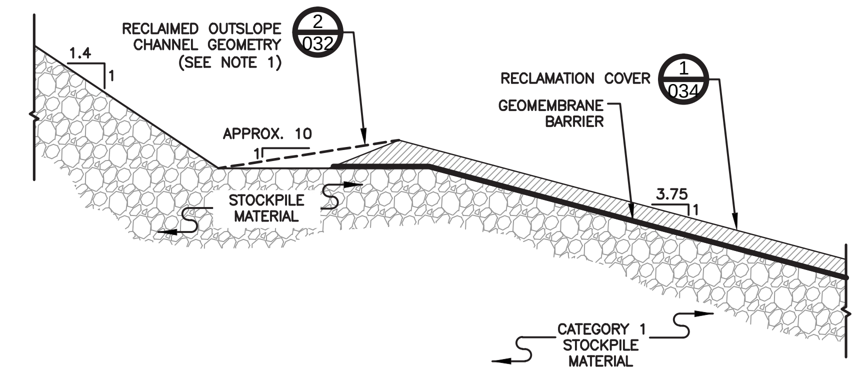
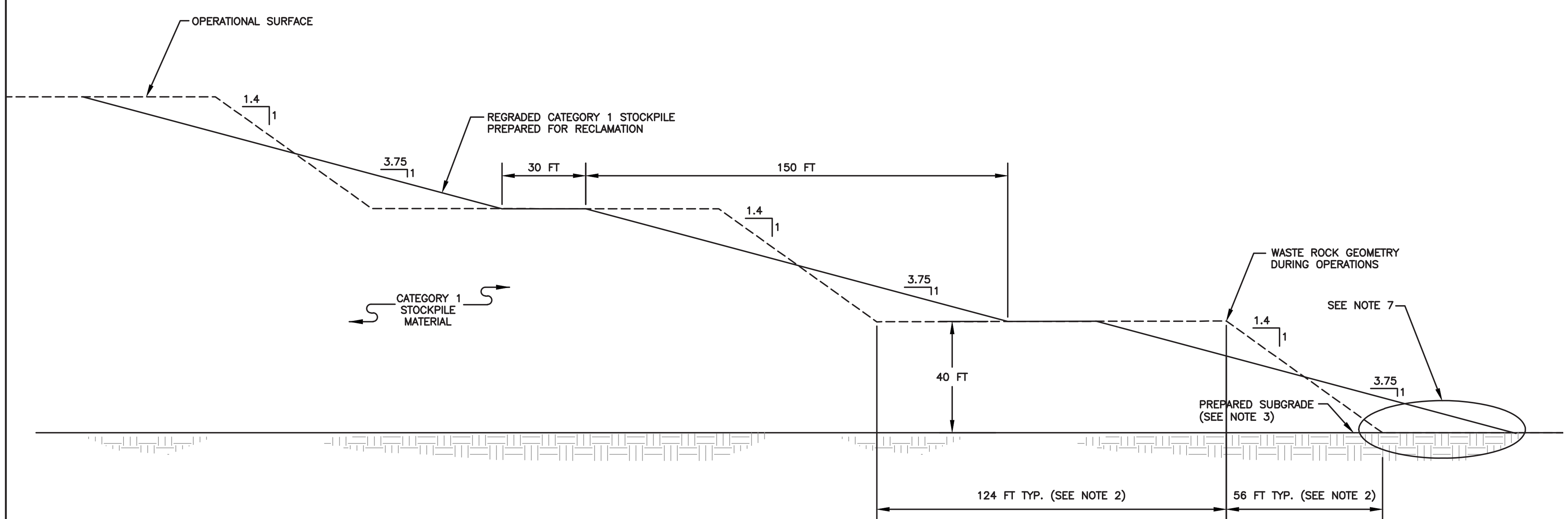
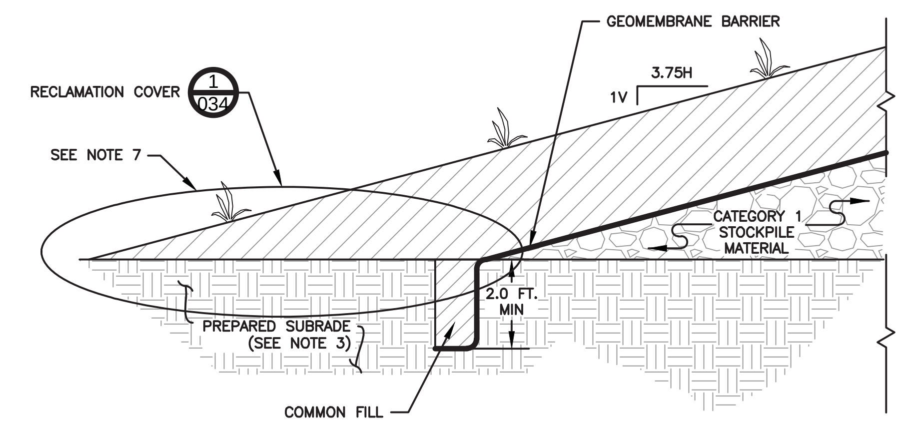


3/034 RECLAMATION TO OPERATIONAL AREA TIE IN DETAIL
N.T.S.



4/034 CATEGORY 1 STOCKPILE TYPICAL GEOMETRY DURING OPERATIONS AND REGRADED FOR RECLAMATION
N.T.S.



5/034 GEOMEMBRANE COVER ANCHOR TRENCH DETAIL
N.T.S.

NOTES

1. TEMPORARY SLOPE BENCH CHANNEL SHOULD BE CONSTRUCTED WITH MINIMUM DEPTH OF 2.4 FT. ON THE BENCHES BY GRADING CHANNEL SIDE SLOPES TO 10H:1V ON 30 FT. WIDE BENCHES.
2. STOCKPILE GEOMETRY DURING OPERATIONS BASED ON ASSUMED WASTE ROCK ANGLE OF REPOSE OF 35.5 DEGREES (1.4H:1V).
3. GEOTECHNICALLY UNSUITABLE SOILS TO BE REMOVED AND REPLACED WITH COMPACTED STRUCTURAL FILL WITHIN 100 FT. OF CATEGORY 1 STOCKPILE PERIMETER LIMITS.
4. ON TOP OF STOCKPILE ON 1% SLOPE AREAS, PLACE 4 INCH DIAMETER PERFORATED CORRUGATED POLYETHYLENE PIPE (CPEP) WITH FILTER FABRIC SOCK AT 75 FOOT SPACING TO FACILITATE DRAINAGE OF GRANULAR DRAINAGE LAYER TO TOP SURFACE CHANNEL. PIPE LOCATION TO BE FIELD FIT.
5. AT STOCKPILE BENCHES, PLACE 4 INCH PERFORATED CPEP DRAIN PIPE WITH FILTER FABRIC SOCK AT BASE OF COVER SYSTEM GRANULAR DRAINAGE LAYER AT SLOPE-BENCH INTERSECTION WITH OUTFLOW DIRECTED TO DOWNCHUTE CHANNELS.
6. SEE GENERAL NOTES AND LEGEND ON DRAWING 002.
7. EDGE OF LINER TO TIE IN TO CATEGORY 1 WASTE ROCK STOCKPILE GROUNDWATER CONTAINMENT SYSTEM.

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DRAWN: MTM 09/13/11
CHECKED: GG 09/13/11
GOLDER PROJECT NO.: 113-2209
SCALE: AS SHOWN

PLANT DRAWING NUMBER:

PHASED COVER DESIGN

POLYMET MINING

POLYMET MINING INC
NORTHMET PROJECT
HOYT LAKES, MINNESOTA

Golder Associates

GOLDER ASSOCIATES INC.
44 UNION BOULEVARD, SUITE 300
LAKEWOOD, CO USA 80233
Ph: (303) 980-0540
Fax: (303) 985-2080
www.golder.com

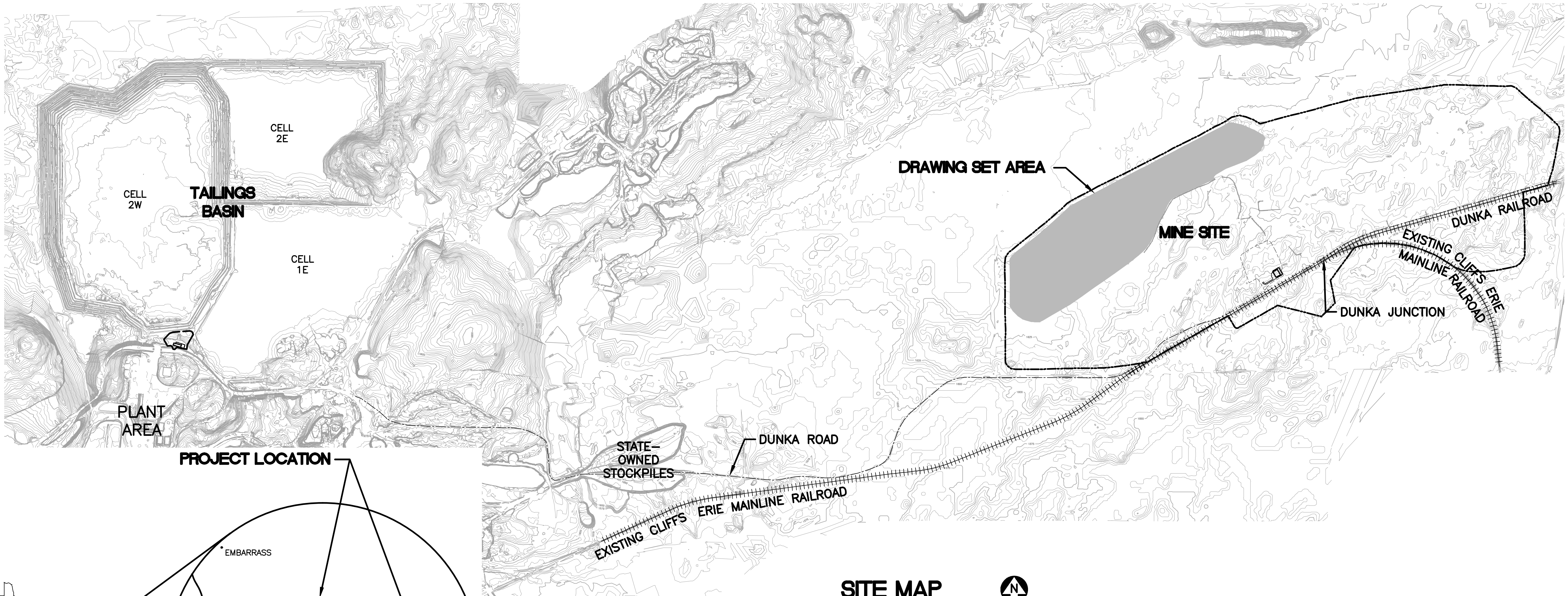
DWG. NO. SKP-034
REV D

INCHES 1 2

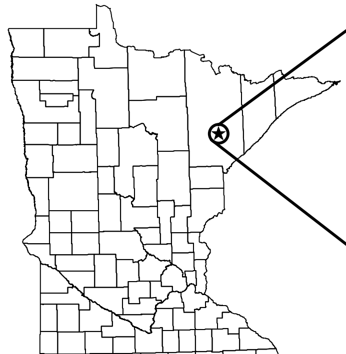
Attachment C

Category 1 Waste Rock Stockpile Groundwater Containment System Design Permit Drawings

POLY MET MINING INC NORTHMET PROJECT
PERMIT SUPPORT DRAWINGS
CATEGORY 1 STOCKPILE GROUNDWATER CONTAINMENT SYSTEM
HOYT LAKES, MINNESOTA

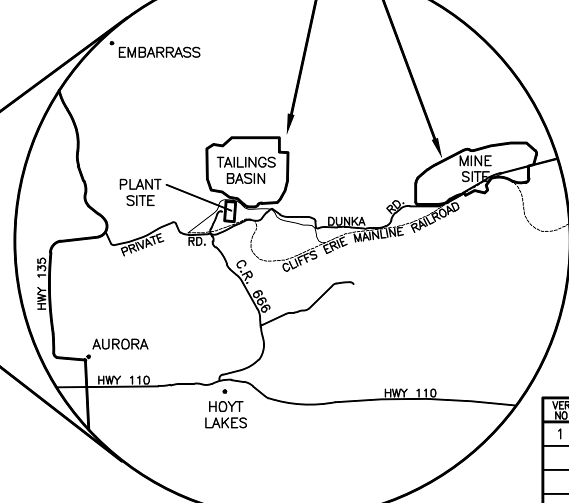


SITE MAP



LOCATION MAP

NOT TO SCALE



VICINITY MAP

NOT TO SCALE

VER NO	DATE	DESCRIPTION
1	10/18/11	VERSION 1

DRAWING STATUS			
	ISSUED	VERSION	DATE
FOR PERMITTING		1	10/18/2011
FOR CONSTRUCTION			
PERMIT DRAWINGS – NOT APPROVED FOR CONSTRUCTION.			

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PRINTED NAME ____________

DATE ______ REG. NO. ______

DRAWN: CAD

CHECKED: CMK2

BARR PROJECT NO.: 23/69-0C29

SCALE: AS SHOWN

PLANT DRAWING NUMBER:

CATEGORY 1 STOCKPILE GROUNDWATER CONTAINMENT SYSTEM LOCATION MAP AND SITE MAP

POLYMET MINING

POLY MET MINING, INC.
NORTHMET PROJECT
HOYT LAKES, MINNESOTA

BARR

BARR ENGINEERING COMPANY
4700 WEST 77TH STREET
MINNEAPOLIS, MN.
Ph: 1-800-632-2277

DWG. NO. GCS-001

REV B

CADD USER: Cristian A. Diaz FILE: K:\DESIGN\23690C29.10\PERMIT_NMM-21-CS-001.DWG PLOT SCALE: 1:2 PLOT DATE: 5/22/2014 3:41 PM

INCHES 1 2

GENERAL LEGEND

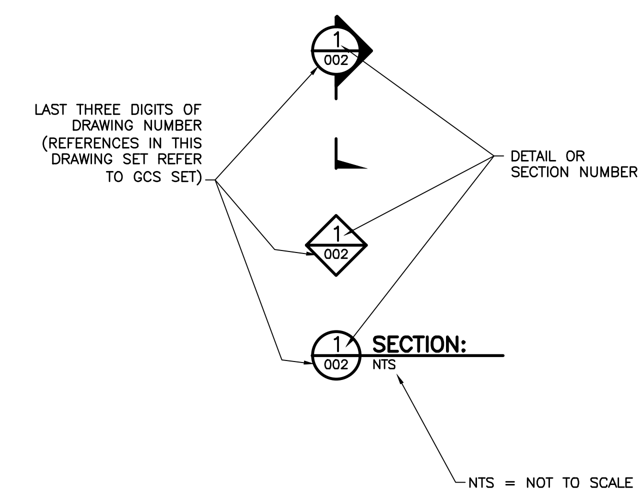
——1000——	EXISTING CONTOUR – MAJOR
	EXISTING CONTOUR – MINOR
	MINE SITE BOUNDARY
—— OF ——	PROPOSED SUMP OVERFLOW PIPE
	PROPOSED PROCESS WATER PIPE (PUMPED FLOW)
	PROPOSED PROCESS WATER PIPE (GRAVITY FLOW)
	PROPOSED SUMP MANHOLE
	PROPOSED ACCESS ROADS
	HAUL ROAD

SHEET INDEX

SHEET NO. TITLE

GENERAL DRAWINGS

DRAWING NUMBERING



NOTES

1. COORDINATE SYSTEM IS MINNESOTA STATE PLANE NORTH ZONE, NAD83.
2. ELEVATIONS ARE MEAN SEA LEVEL (MSL), NAVD88.
3. EXISTING TOPOGRAPHIC INFORMATION SHOWN ON THE DRAWINGS WAS PREPARED BY AEROMETRIC, INC. FROM LIDAR DATA COLLECTED ON MARCH 17, 2010.

ABBREVIATIONS

CAT	–	CATEGORY
DWG	–	DRAWING
EL	–	ELEVATION
GCS	–	GROUNDWATER CONTAINMENT SYSTEM
MH	–	MANHOLE
NTS	–	NOT TO SCALE
PVI	–	PROFILE VERTICAL INFLECTION
STA	–	STATION
WWTF	–	WASTE WATER TREATMENT FACILITY

VER NO	DATE	DESCRIPTION
1	10/18/11	VERSION 1

DRAWING STATUS		
ISSUED	VERSION	DATE
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DATE ______ REG. NO. ______

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CHECKED: CMK2
BARR PROJECT NO.: 23/69-0C29
SCALE: AS SHOWN

PLANT DRAWING NUMBER:

CATEGORY 1 STOCKPILE
GROUNDWATER CONTAINMENT SYSTEM
LEGEND AND SHEET INDEX

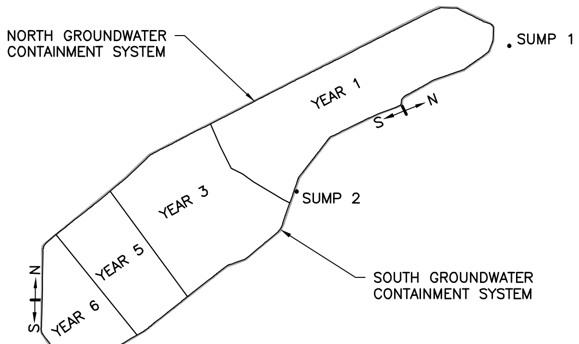
POLYMET MINING

POLY MET MINING, INC.
NORTHMET PROJECT
HOYT LAKES, MINNESOTA

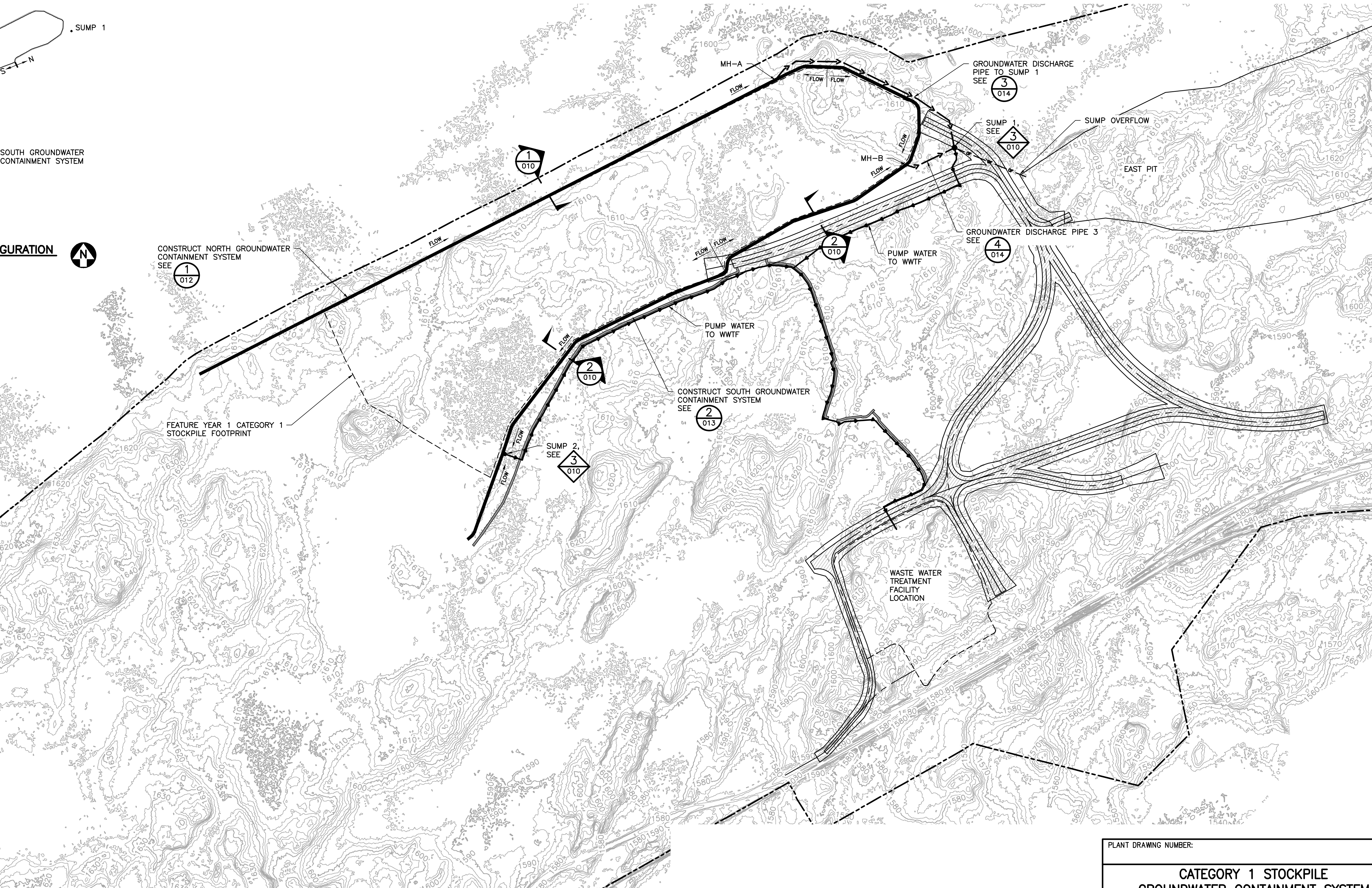
BARR

BARR ENGINEERING COMPANY
4700 WEST 77TH STREET
MINNEAPOLIS, MN.
Ph: 1-800-632-2277

DWG. NO. GCS–002 REV B



1 PLAN: OVERALL CONFIGURATION
NTS



2 PLAN: GCS – YEAR 0 LAYOUT
0 500 1000
SCALE IN FEET

INCHES 1 2

VER NO	DATE	DESCRIPTION
1	10/18/11	VERSION 1

DRAWING STATUS		
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DATE ________ REG. NO. ________

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CHECKED: CMK2
BARR PROJECT NO.: 23/69-0C29
SCALE: AS SHOWN

PLANT DRAWING NUMBER:

CATEGORY 1 STOCKPILE GROUNDWATER CONTAINMENT SYSTEM YEAR 0

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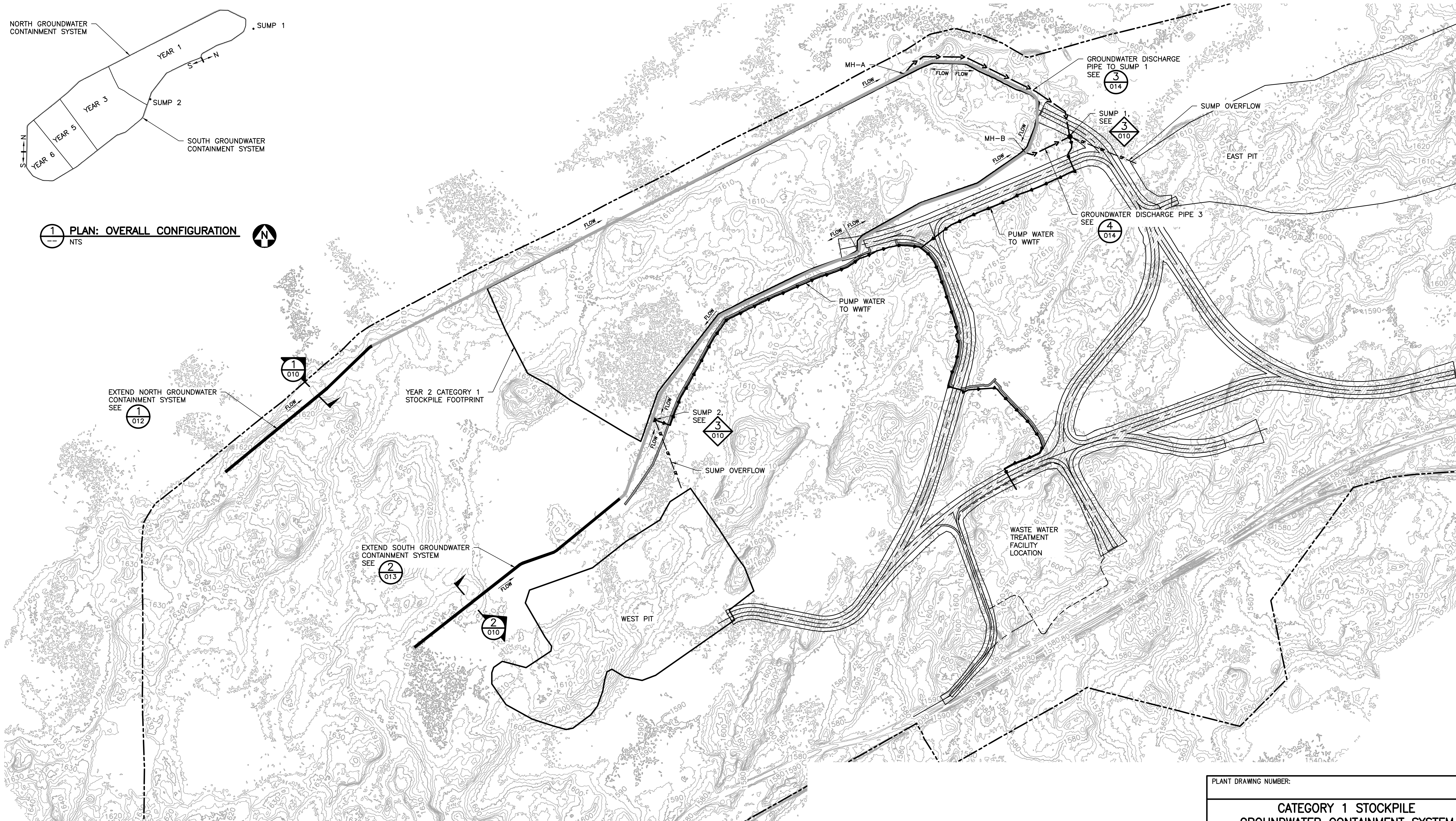
DWG. NO. GCS-003
REV B.1



1 PLAN: OVERALL CONFIGURATION
NTS

2 PLAN: GCS – YEAR 2 LAYOUT
0 500 1000
SCALE IN FEET

VER NO	DATE	DESCRIPTION
1	10/18/11	VERSION 1

DRAWING STATUS	ISSUED	VERSION	DATE
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DATE ____ REG. NO. ____

DRAWN: CAD
CHECKED: CMK2
BARR PROJECT NO.: 23/69-0C29
SCALE: AS SHOWN

PLANT DRAWING NUMBER:

CATEGORY 1 STOCKPILE
GROUNDWATER CONTAINMENT SYSTEM
YEAR 2 LAYOUT

POLYMET MINING
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NORTHMET PROJECT
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DWG. NO. GCS-004
REV B.1

CADD USER: Cristian A. Diaz FILE: K:\DESIGN\23690C29.10\PERMIT_NMM-21-CS-004.DWG PLOT SCALE: 1:2 PLOT DATE: 5/22/2014 3:43 PM

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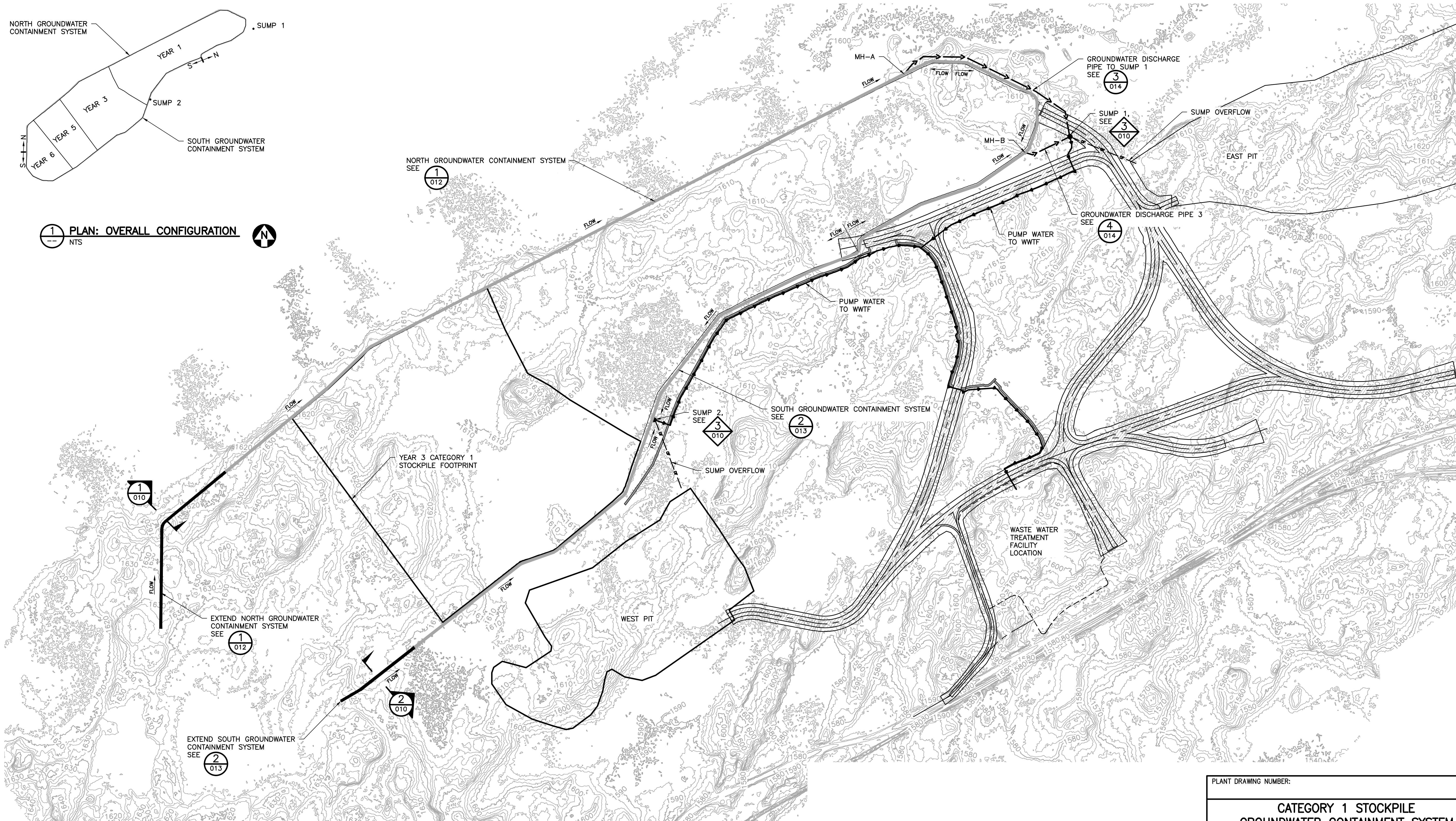

1 -- PLAN: OVERALL CONFIGURATION
NTS

2 -- PLAN: GCS – YEAR 3 LAYOUT
0 500 1000
SCALE IN FEET

CADD USER: Cristian A. Diaz FILE: K:\DESIGN\23690C29.10\PERMIT_NMM-21-CS-005.DWG PLOT SCALE: 1:2 PLOT DATE: 5/22/2014 3:44 PM

INCHES 1 2

VER NO	DATE	DESCRIPTION
1	10/18/11	VERSION 1

DRAWING STATUS		
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FOR PERMITTING	1	10/18/2011
FOR CONSTRUCTION		
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PRINTED NAME ____________
DATE ________ REG. NO. ________

DRAWN: CAD
CHECKED: CMK2
BARR PROJECT NO.: 23/69-0C29
SCALE: AS SHOWN

PLANT DRAWING NUMBER:

CATEGORY 1 STOCKPILE GROUNDWATER CONTAINMENT SYSTEM YEAR 3 LAYOUT

POLYMET MINING

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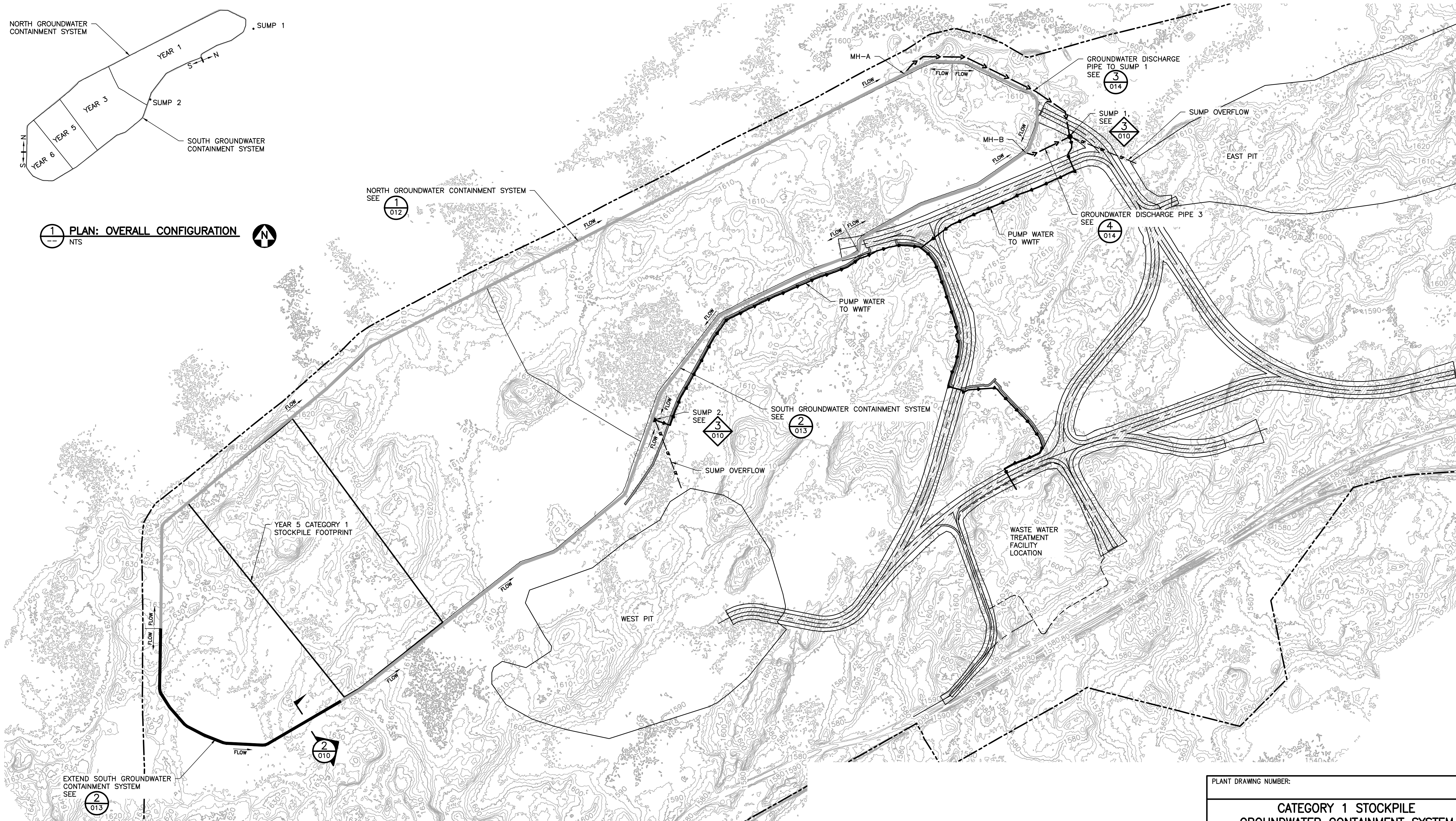
MINNEAPOLIS, MN.
Ph: 1-800-632-2277

DWG. NO. GCS-005
REV B.1



2 PLAN: GCS – YEAR 5 LAYOUT

0 500 1000
SCALE IN FEET

CADD USER: Cristian A. Diaz FILE: K:\DESIGN\23690C29.10\PERMIT_NMM-21-CS-006.DWG PLOT SCALE: 1:2 PLOT DATE: 5/22/2014 3:44 PM

VER NO	DATE	DESCRIPTION
1	10/18/11	VERSION 1

DRAWING STATUS

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CHECKED: CMK2
BARR PROJECT NO.: 23/69-0C29
SCALE: AS SHOWN

PLANT DRAWING NUMBER:

CATEGORY 1 STOCKPILE GROUNDWATER CONTAINMENT SYSTEM YEAR 5 LAYOUT

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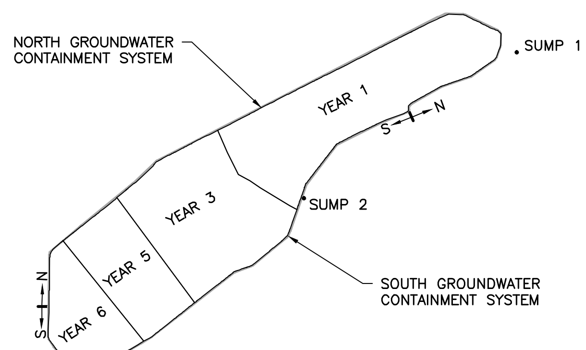
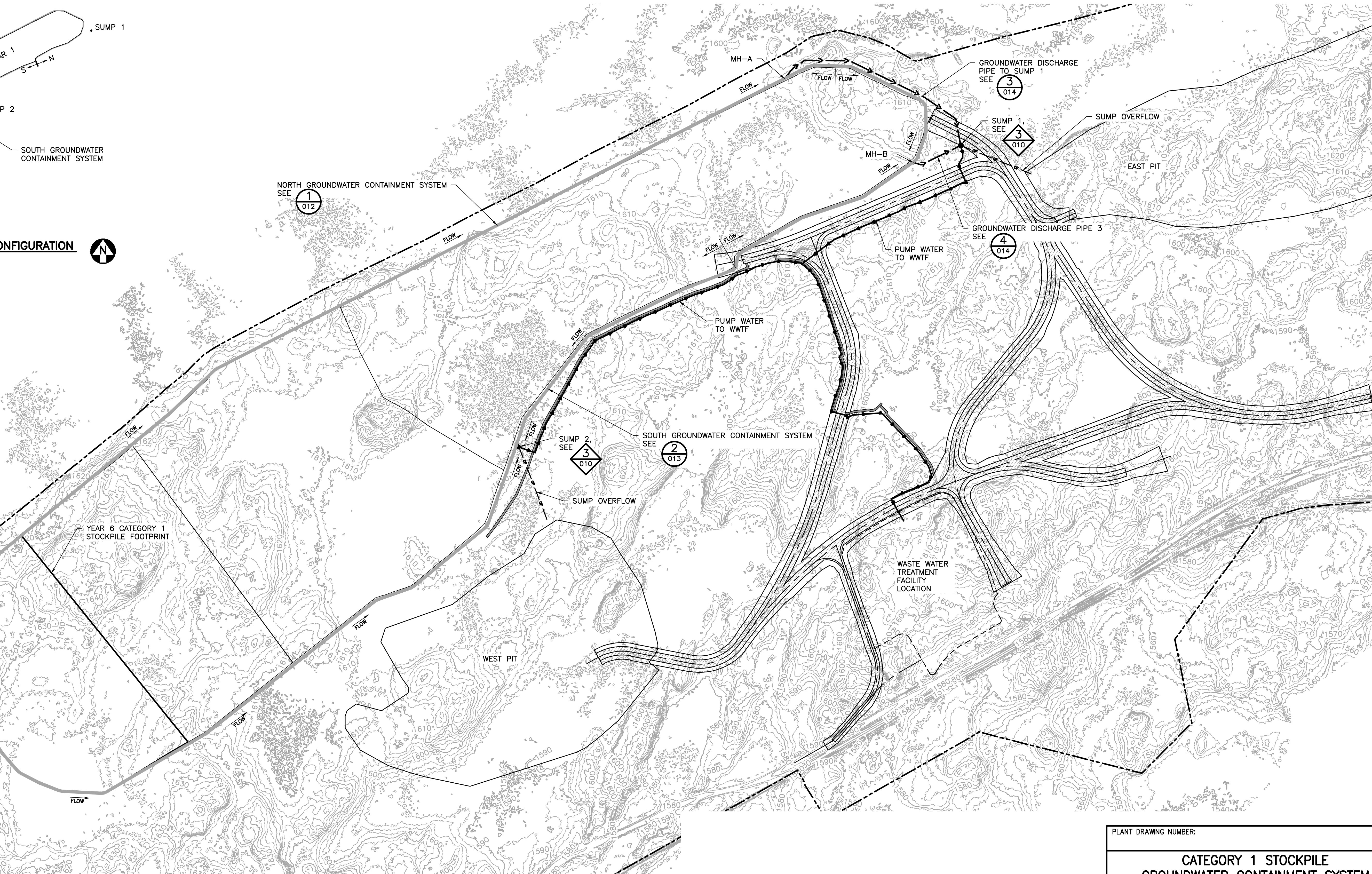
DWG. NO. GCS-006

REV B.1



1 -- PLAN: OVERALL CONFIGURATION
NTS



2 -- PLAN: GCS – YEAR 6 LAYOUT
0 500 1000
SCALE IN FEET

VER NO	DATE	DESCRIPTION
1	10/18/11	VERSION 1

DRAWING STATUS		
ISSUED	VERSION	DATE
FOR PERMITTING	1	10/18/2011
FOR CONSTRUCTION		
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SCALE: AS SHOWN

PLANT DRAWING NUMBER:

CATEGORY 1 STOCKPILE GROUNDWATER CONTAINMENT SYSTEM YEAR 6 LAYOUT

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DWG. NO. GCS-007
REV B.1

CADD USER: Cristian A. Diaz FILE: K:\DESIGN\23690C29.10\PERMIT_NMM-21-CS-007.DWG PLOT SCALE: 1:2 PLOT DATE: 5/22/2014 3:45 PM

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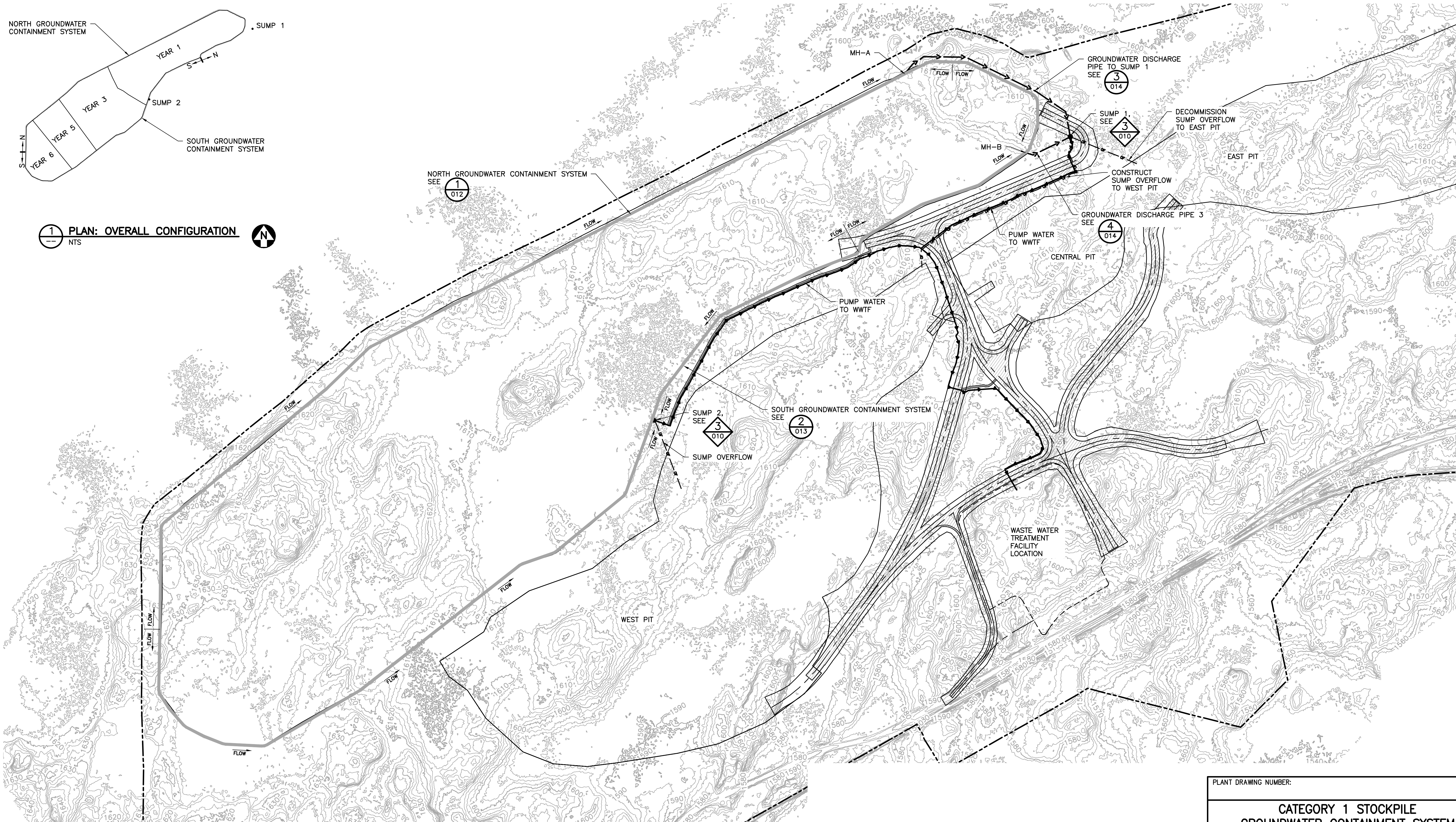

1 PLAN: OVERALL CONFIGURATION
NTS

2 PLAN: GCS – YEAR 20 LAYOUT
0 500 1000
SCALE IN FEET

VER NO	DATE	DESCRIPTION
1	10/18/11	VERSION 1

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SCALE: AS SHOWN

PLANT DRAWING NUMBER:

CATEGORY 1 STOCKPILE GROUNDWATER CONTAINMENT SYSTEM YEAR 20 LAYOUT

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DWG. NO. GCS-008
REV B.1

CADD USER: Cristian A. Diaz FILE: K:\DESIGN\23690C29.10\PERMIT_NMM-21-CS-008.DWG PLOT SCALE: 1:2 PLOT DATE: 5/22/2014 3:46 PM

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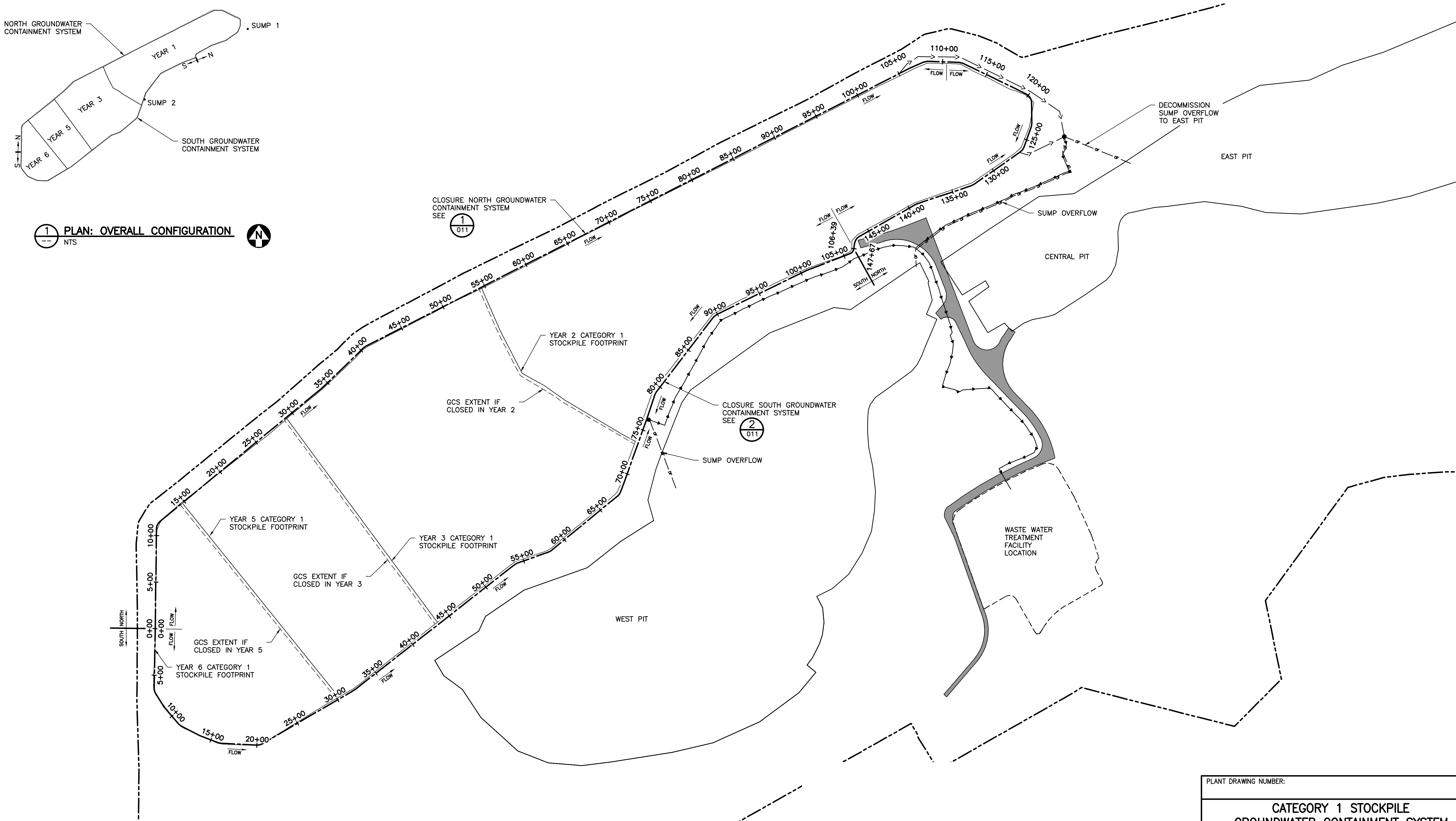

1 PLAN: OVERALL CONFIGURATION
NTS

2 PLAN: CLOSURE CONFIGURATION
0 500 1000
SCALE IN FEET

PLANT DRAWING NUMBER:

CATEGORY 1 STOCKPILE
GROUNDWATER CONTAINMENT SYSTEM
CLOSURE CONFIGURATION

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VER NO	DATE	DESCRIPTION
1	10/18/11	VERSION 1

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SCALE: AS SHOWN

DWG. NO. GCS-009
REV B.1

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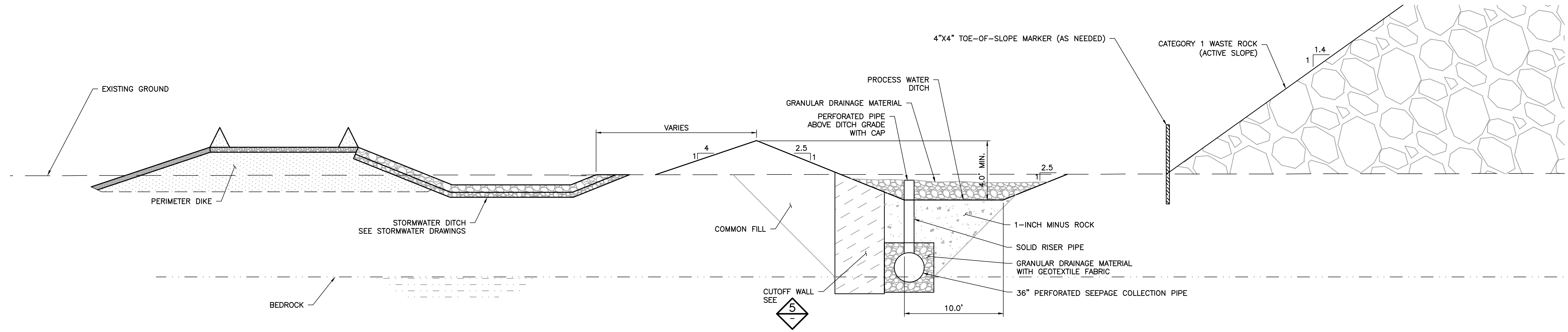
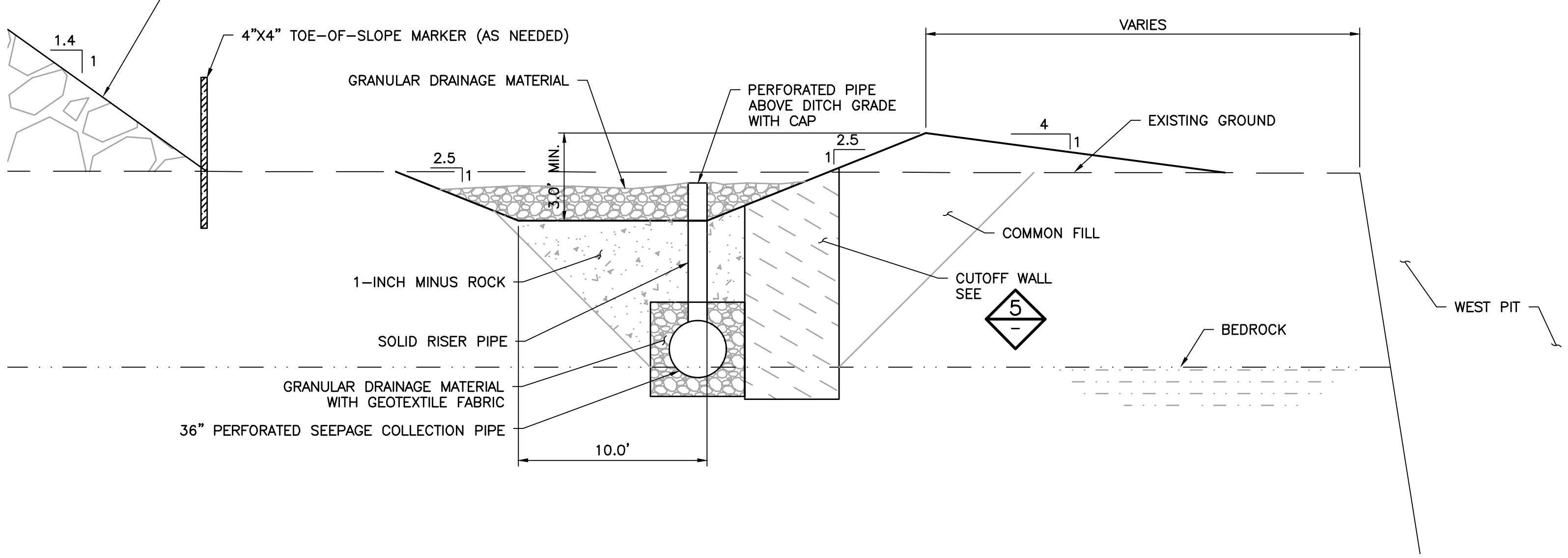
INCHES 1 2



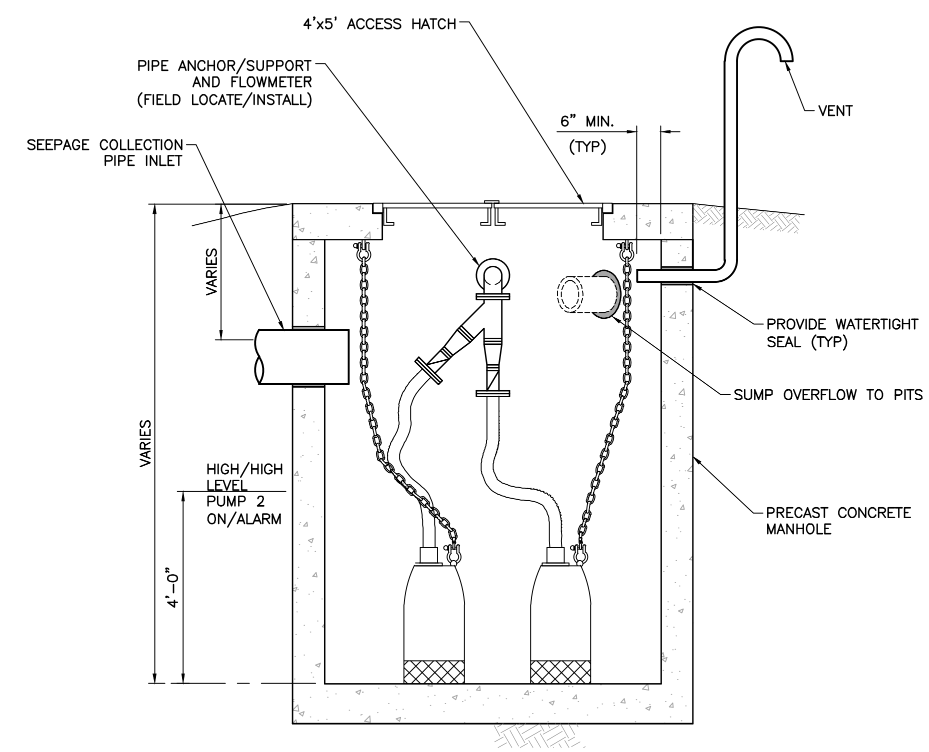
1 SECTION: NORTH GROUNDWATER CONTAINMENT SYSTEM TYPICAL SECTION – ADJACENT TO ACTIVE STOCKPILE

0 5 10 SCALE IN FEET



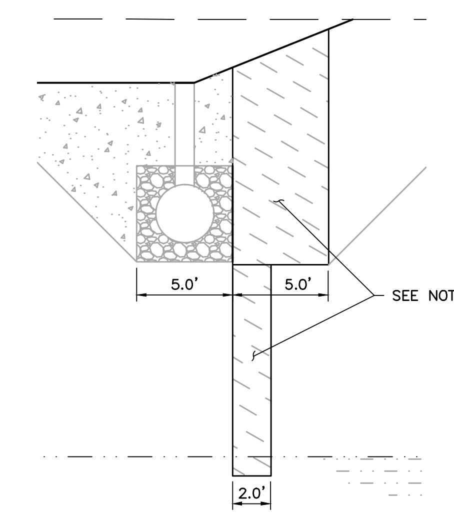
2 SECTION: SOUTH AND WEST GROUNDWATER CONTAINMENT SYSTEM TYPICAL SECTION – ADJACENT TO ACTIVE STOCKPILE

0 5 10 SCALE IN FEET



3 SECTION: TYPICAL SUMP

NTS



3 SECTION: TYPICAL CUTOFF WALL

0 5 10 SCALE IN FEET

NOTES:

1. CUTOFF WALL WILL BE A HYDRAULIC BARRIER CONSTRUCTED OF COMPACTED SOIL, GEOSYNTHETIC CLAY, OR APPROVED ALTERNATE.

2. USE TRENCHLESS TECHNOLOGY TO CONSTRUCT 2' WIDE TRENCH DOWN TO COMPETENT BEDROCK IN AREAS WHERE COLLECTION PIPE IS LOCATED ABOVE BEDROCK. SEE

VER NO	DATE	DESCRIPTION
1	10/18/11	VERSION 1

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PLANT DRAWING NUMBER:

CATEGORY 1 STOCKPILE GROUNDWATER CONTAINMENT SYSTEM TYPICAL CROSS SECTIONS

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DWG. NO. GCS-010
REV B.2

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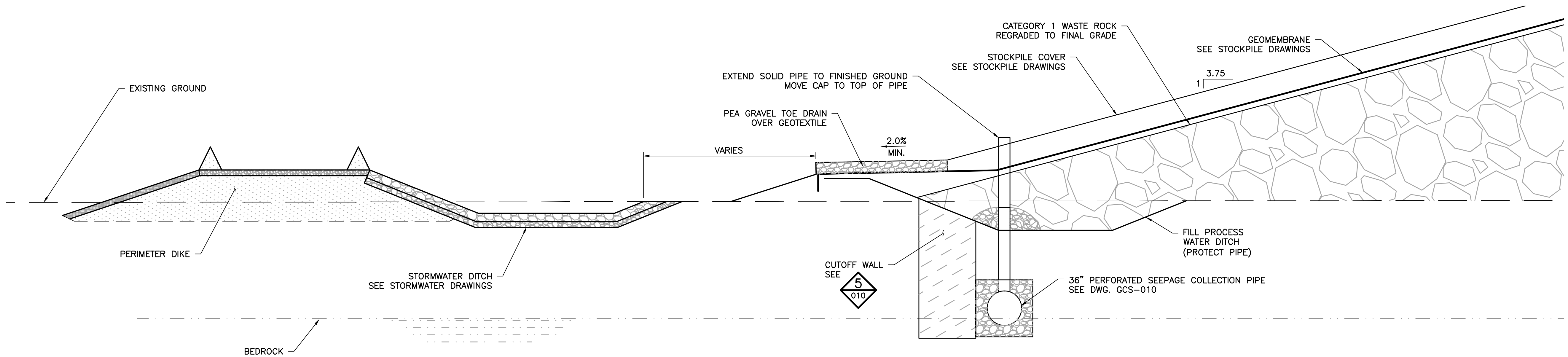
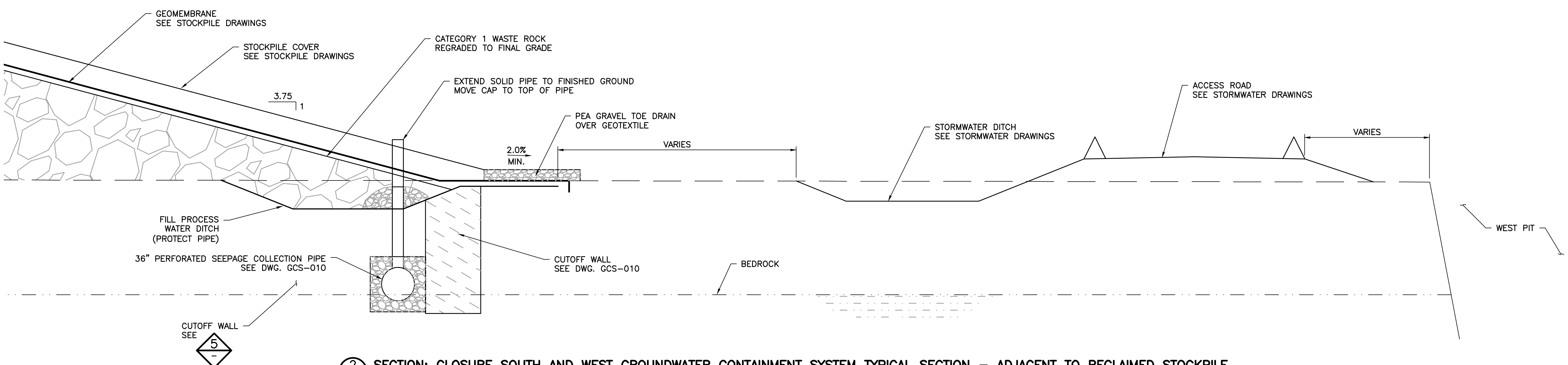
INCHES 1 2



1/– SECTION: CLOSURE NORTH GROUNDWATER CONTAINMENT SYSTEM TYPICAL SECTION – ADJACENT TO RECLAIMED STOCKPILE

0 5 10
SCALE IN FEET



2/– SECTION: CLOSURE SOUTH AND WEST GROUNDWATER CONTAINMENT SYSTEM TYPICAL SECTION – ADJACENT TO RECLAIMED STOCKPILE

0 5 10
SCALE IN FEET

PLANT DRAWING NUMBER:

CATEGORY 1 STOCKPILE GROUNDWATER CONTAINMENT SYSTEM TYPICAL CROSS SECTIONS

VER NO	DATE	DESCRIPTION
1	10/18/11	VERSION 1

DRAWING STATUS		
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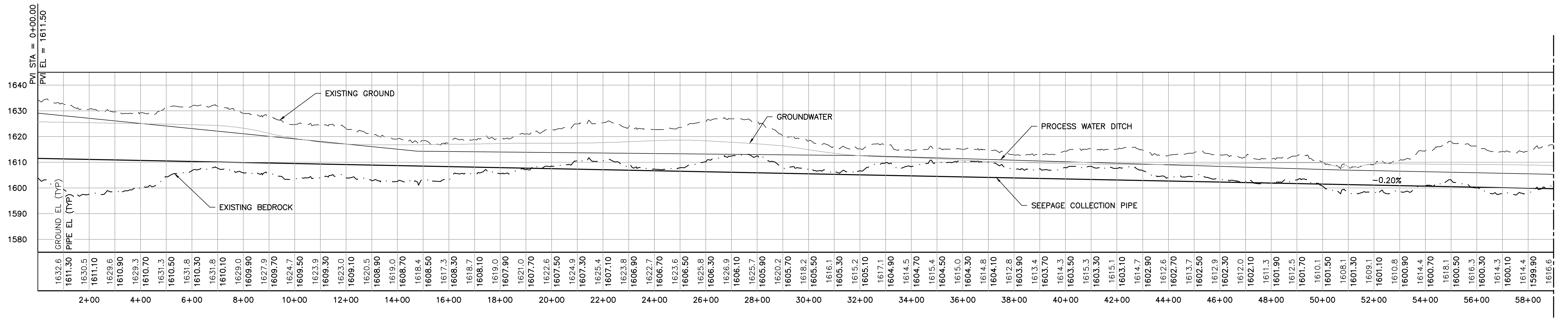
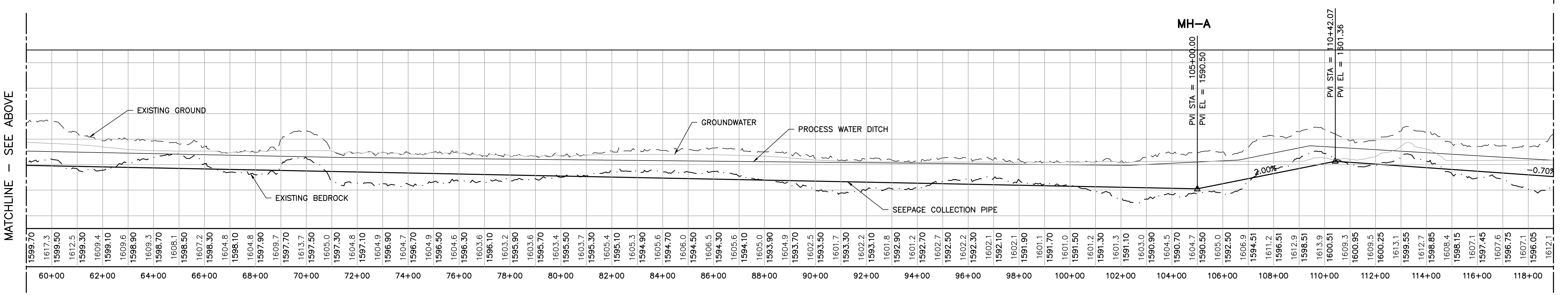
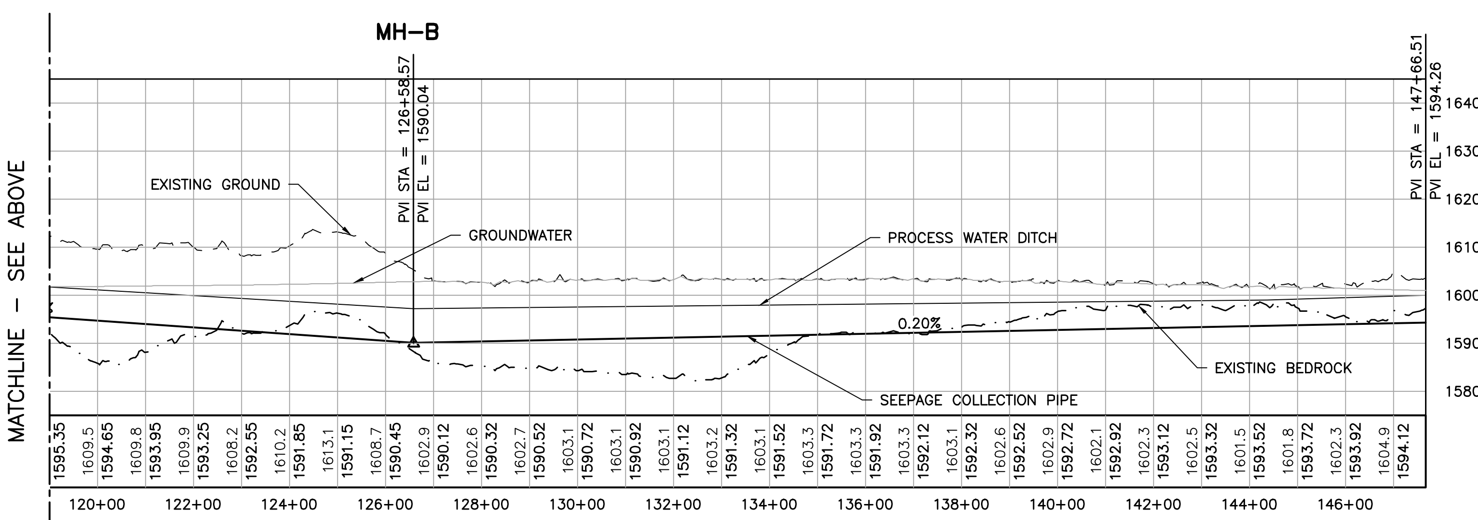
DWG. NO. GCS-011
REV B.1

INCHES 1 2







1 PROFILE: NORTH GROUNDWATER CONTAINMENT SYSTEM

NOTE:

ALL GROUNDWATER AND BEDROCK PROFILES SHOWN ARE APPROXIMATE.

VER NO	DATE	DESCRIPTION
1	10/18/11	VERSION 1

DRAWING STATUS		
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DRAWN: CAD
CHECKED: CMK2
BARR PROJECT NO.: 23/69-0C29
SCALE: AS SHOWN

PLANT DRAWING NUMBER:

CATEGORY 1 STOCKPILE
GROUNDWATER CONTAINMENT SYSTEM
NORTH PROFILES

POLYMET MINING

POLY MET MINING, INC.
NORTHMET PROJECT
HOYT LAKES, MINNESOTA

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DWG. NO. GCS-012

REV B.1

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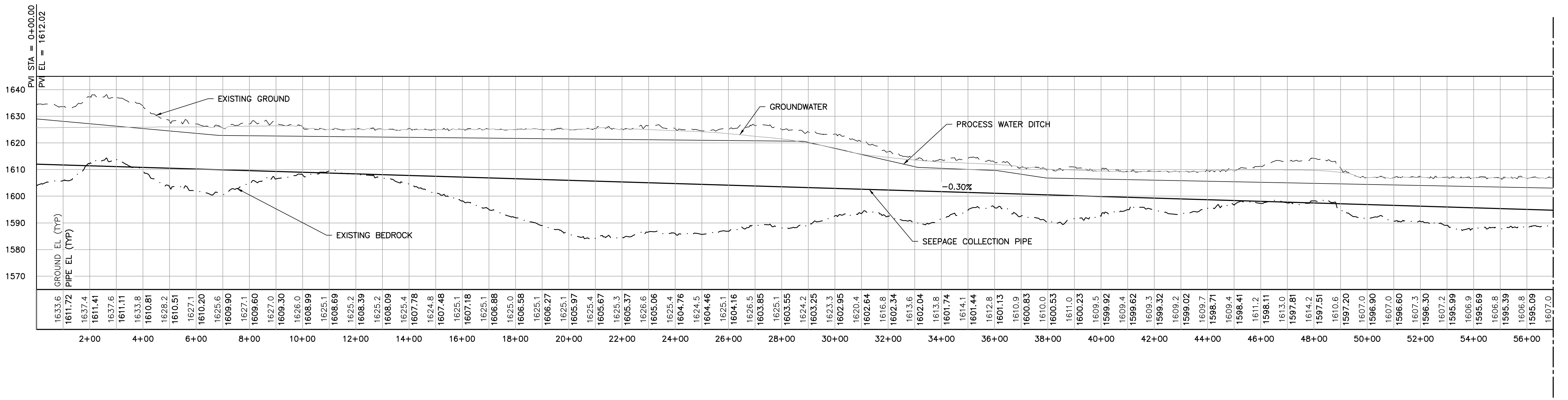

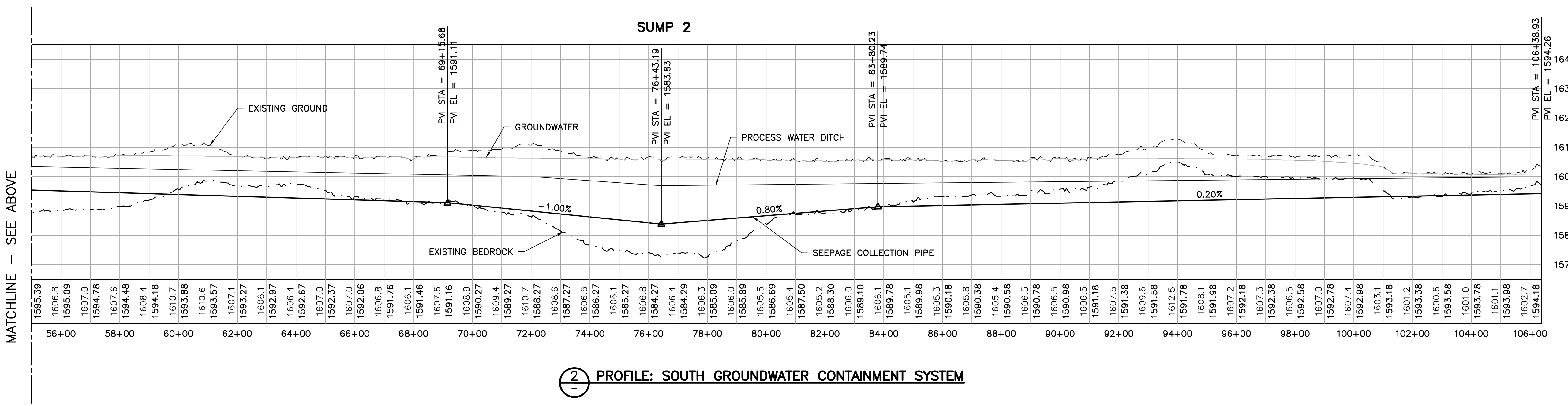

2 PROFILE: SOUTH GROUNDWATER CONTAINMENT SYSTEM

NOTE:

ALL GROUNDWATER AND BEDROCK PROFILES SHOWN ARE APPROXIMATE.

VER NO	DATE	DESCRIPTION
1	10/18/11	VERSION 1

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PRINTED NAME ____
DATE ____ REG. NO. ____

DRAWN: CAD
CHECKED: CMK2
BARR PROJECT NO.: 23/69-0C29
SCALE: AS SHOWN

PLANT DRAWING NUMBER:

CATEGORY 1 STOCKPILE
GROUNDWATER CONTAINMENT SYSTEM
SOUTH PROFILES

POLYMET MINING
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NORTHMET PROJECT
HOYT LAKES, MINNESOTA

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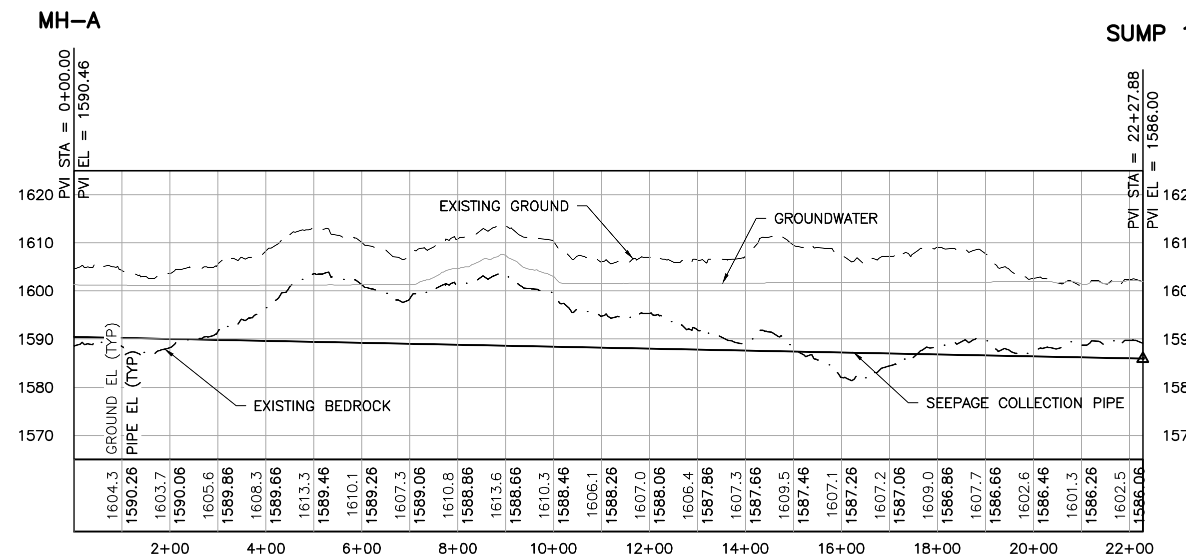
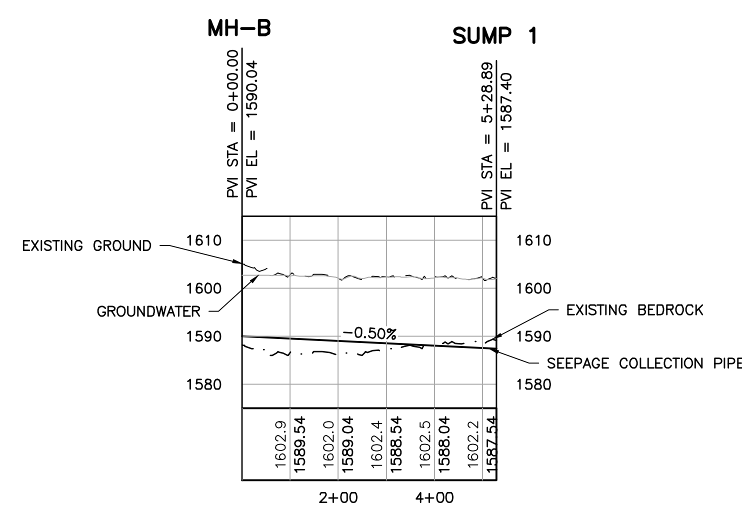
DWG. NO. GCS-013
REV B.1

INCHES 1 2



(3) PROFILE: MANHOLE A GROUNDWATER DISCHARGE PIPE TO SUMP 1



(4) PROFILE: MANHOLE B GROUNDWATER DISCHARGE PIPE TO SUMP 1

NOTE:

ALL GROUNDWATER AND BEDROCK PROFILES SHOWN ARE APPROXIMATE.

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1	10/18/11	VERSION 1

DRAWING STATUS		
ISSUED	VERSION	DATE
FOR PERMITTING	1	10/18/2011
FOR CONSTRUCTION		
PERMIT DRAWINGS – NOT APPROVED FOR CONSTRUCTION.		

I HEREBY CERTIFY THAT THIS PLAN, SPECIFICATION, OR REPORT WAS PREPARED BY ME OR UNDER MY DIRECT SUPERVISION AND THAT I AM A DULY LICENSED PROFESSIONAL ENGINEER UNDER THE LAWS OF THE STATE OF MINNESOTA.

SIGNATURE ______
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DATE ______ REG. NO. ______

DRAWN: CAD
CHECKED: CMK2
BARR PROJECT NO.: 23/69-0C29
SCALE: AS SHOWN

PLANT DRAWING NUMBER:

CATEGORY 1 STOCKPILE
GROUNDWATER CONTAINMENT SYSTEM
DISCHARGE PROFILES

POLYMET MINING

POLY MET MINING, INC.
NORTHMET PROJECT
HOYT LAKES, MINNESOTA

BARR

BARR ENGINEERING COMPANY
4700 WEST 77TH STREET
MINNEAPOLIS, MN.
Ph: 1-800-632-2277

DWG. NO. GCS-014

REV B.1

Attachment D

Groundwater Containment Systems: Degree of Use in Industry

Technical Memorandum

To: Poly Met Mining Inc. (PolyMet)
From: Tom Radue and Christie Kearney
Subject: Groundwater Containment System: Degree of Use in Industry
Date: December 26, 2012
Project: 23/69-0862

A groundwater containment system will be constructed around the Category 1 Waste Rock Stockpile to collect stockpile drainage in lieu of a liner system under the stockpile. This memorandum was developed to document the degree to which groundwater containment systems are used in industry today.

Containment systems such as the Category 1 Stockpile Groundwater Containment System are commonly used at facilities where there is a need to manage groundwater flow, such as landfills, tailings basins, and paper sludge disposal facilities. The combined use of a cutoff wall and a groundwater collection system is acknowledged by academic, governmental and industry authorities, and by construction markets (i.e., MoreTrench [http://www.moretrench.com], Hayward Baker [http://haywardbaker.com] and other cutoff wall construction contractors). By way of example, the United States Department of Labor's Mine Safety and Health Administration has developed design guidance for coal refuse facilities that illustrates various designs for the construction of cutoff wall and groundwater collection systems for the purposes of impoundment stability and water quality management (Reference (1)).

The United States Army Corp of Engineers (Reference (2)) and Department of the Interior's Bureau of Reclamation (Reference (3), Reference (4)) have developed design guidance for dams that illustrates various designs for the construction of cutoff wall and groundwater collection systems for the purposes of impoundment stability and water discharge management. These design guidance documents provide the supporting theory, field data requirements, construction recommendations, and typical post-construction performance monitoring procedures for the installation of cutoff wall and groundwater collection systems.

Large Table 1 provides a list of 15 sites, identified by a data search, having containment systems such as that planned for the Category 1 Waste Rock Stockpile. One such example is the constructed cutoff wall and collection system for water quality management in Taunton, Massachusetts. To control and collect groundwater contamination associated with a former pharmaceutical manufacturing facility, a cutoff wall and groundwater collection trench with perforated drain pipe were installed. The cutoff wall (approximately 50-feet deep and 3-feet wide) was constructed next to the 12-foot wide collection trench. The collection trench was equipped with a 4-inch schedule 40 PVC perforated pipe, wrapped in geotextile and bedded with crushed stone. Another example is the installation of a soil-bentonite cutoff wall around the perimeter of a mine tailings pond located in the province of Alberta, Canada. The cutoff wall is approximately 100-feet deep and 3 feet wide, and has a hydraulic conductivity of less than $1x10^{-7}$ cm/sec. The cutoff wall was used to isolate the tailings pond from downgradient surface water features including wetlands and the Athabasca River. Other such examples are shown on Large Table 1 with references listed for further review of each example.

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2. **U.S. Army Corps of Engineers (USACE).** Engineering and Design – Seepage Analysis and Control for Dams. *EM 1110-2-1901.* Washington, D.C. : U.S. Department of the Army, USACE, 1993.

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Large Table 1 Examples of Containment Systems at Other Sites

Location	Reference	Project Setting	Barrier Wall	Trench Dimensions	Seepage Collection	Seepage Collection Pipe	Cover
Carlsbad, NM	(5)	Potash Process Disposal	Slurry wall	10 feet deep	Yes	Yes	None
Duncan, OK	(6)	Landfill Remediation	80 mil HDPE panels	35 feet deep	Yes	No	Native soil
Tacoma, WA	(6)	Wood Process Waste Landfill	Bentonite	30 feet deep	Yes	No	GCL
Dallas, TX	(6)	Landfill Remediation	2x40 mil HDPE panels	35 feet deep	Yes	6-inch PVC	None
Bogalusa, LA	(7)	Papermill Landfill	Soil-bentonite	40 feet deep, 2.5 feet wide	Yes	Yes	None
Oak Ridge, TN	(8)	DOE Landfill	Soil-bentonite	22 feet deep	Yes	No	None
San Antonio, TX	(8)	USAF Landfill	Slurry	40 feet deep, 3 feet wide	Permeable Reactive Barrier (PRB)	No	None
Taunton, MA	(6)	Pharmaceutical Mfr Remediation	Bentonite	55 feet deep, 12 feet wide	Yes	4-inch PVC	Multi-composite liner
Toledo, OH	(6)	MGP Mfr Remediation	Bentonite	Yes, dimensions not listed	Yes	No	Native soil
Salt Lake City, UT	(7)	Watkins Dam Restoration	Cement-bentonite	70 feet deep, 2.5 feet wide	18 feet deep, 3 feet wide	No	None
Burbank, CA	(6)	Brownfield Remediation	Soil-bentonite	60 feet deep	No	No	None
Coahoma, TX	(6)	Oil Field Remediation	None	12 feet deep, 3 feet wide	Yes	No	HDPE
Beaumont, TX	(6)	Creosoting Facility Remediation	Soil-bentonite	50 feet deep	Yes	No	None
Greely, CO	(7)	Former Gravel Quarry	Soil-cement-bentonite	65 feet deep, 3 feet wide	No	No	None
Fort McMurray, Alberta, Canada	(7)	Mine Tailings Pond	Soil-bentonite	100 feet deep, 3 feet wide	No	No	None

Attachment E

Category 1 Waste Rock Stockpile Groundwater Containment System Modeling

Technical Memorandum

To: Poly Met Mining Inc.
From: Jonathon Carter and Christie Kearney
Subject: Category 1 Waste Rock Stockpile Groundwater Containment System Modeling
Date: December 12, 2014
Project: 23690862

Background

Barr conducted groundwater flow modeling for the planned Category 1 Waste Rock Stockpile Groundwater Containment System (containment system) to assess the performance of the containment system (Figure 1). This model was most recently documented in the Rock and Overburden Management Plan, Version 6 (Reference (1)). The Mine Site MODFLOW groundwater model that this model was developed upon has been updated and recalibrated and will be documented in Attachment C of Reference (2). Because much of the modeling for the containment system is based on the modeling from the Mine Site MODFLOW model, the containment system modeling has also been updated to reflect the recalibration. This memorandum was developed to provide a summary of the modeling that was completed for the containment system.

Modeling Approach and Set-Up

A conceptual representation of the hydrogeology associated with the containment system is shown in Figure 2 and Figure 3 for conditions during operations and in long-term closure, respectively. Water that infiltrates at the surface of the open stockpile, or percolates through the geomembrane cover system, seeps downward into the native unconsolidated deposits located beneath the stockpile. The unconsolidated deposits are underlain by bedrock having low hydraulic conductivity. A groundwater divide currently exists and is expected to persist, across the stockpile footprint, resulting in groundwater flow to the south toward the West and East Pits and to the north toward the One Hundred Mile Swamp wetland complex.

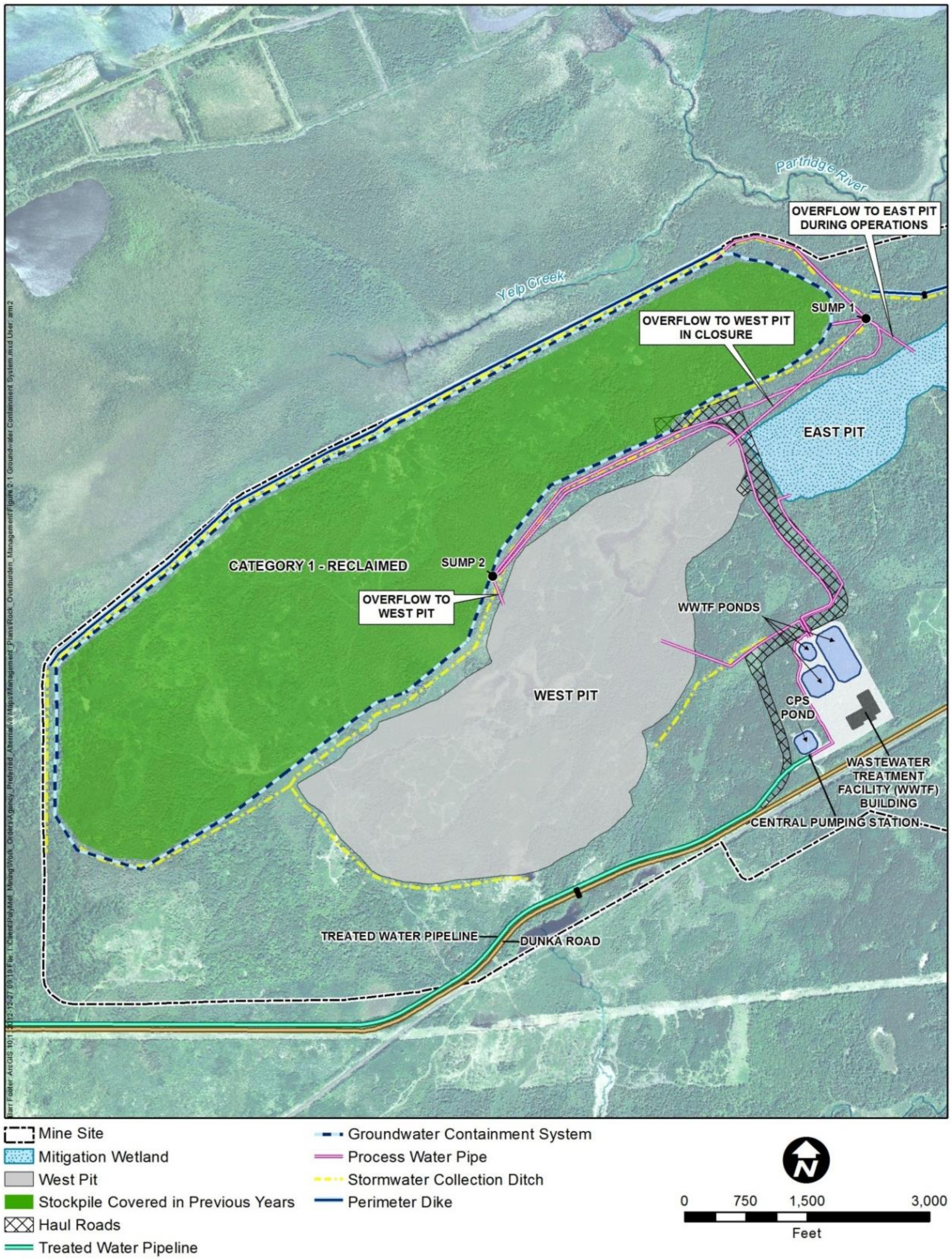

Figure 1 Category 1 Waste Rock Groundwater Containment System

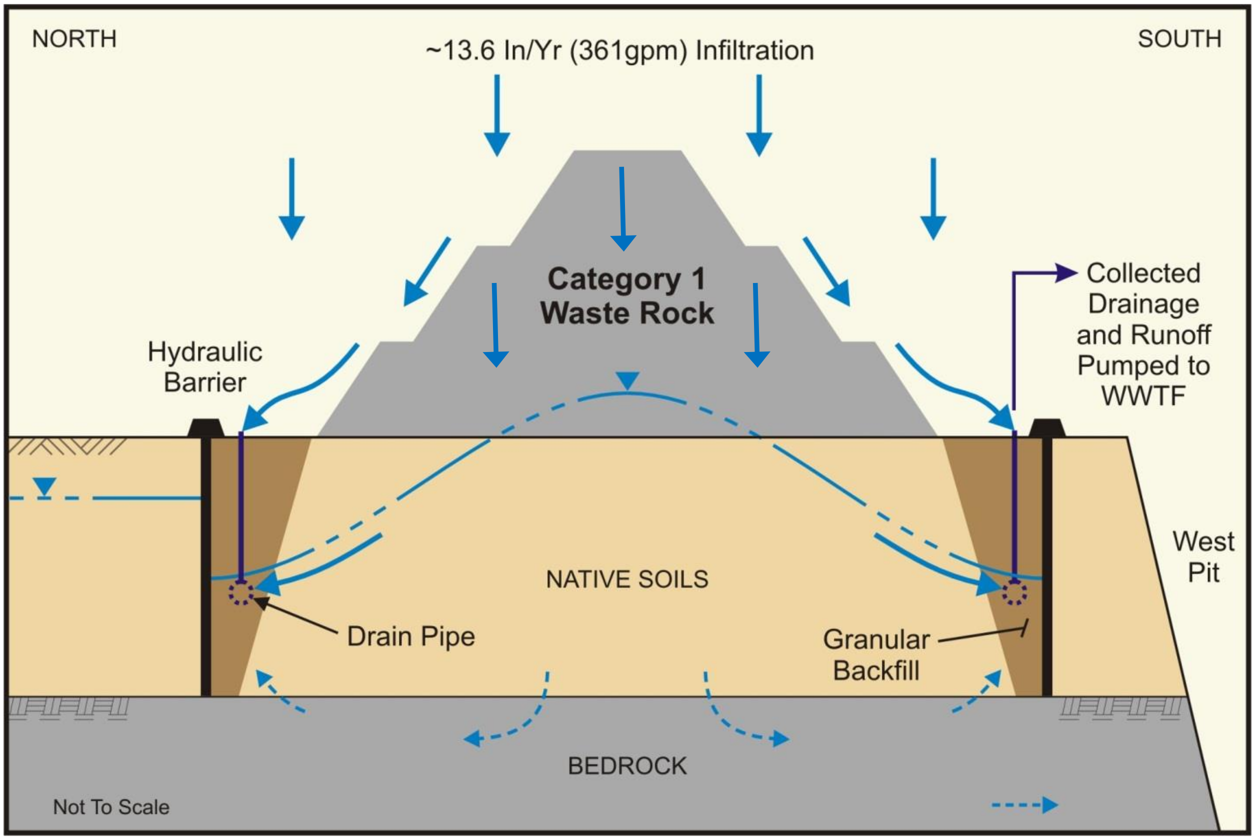

Figure 2 Conceptual Representation of Category 1 Waste Rock Stockpile Groundwater Containment System – Operating Conditions Cross-Section

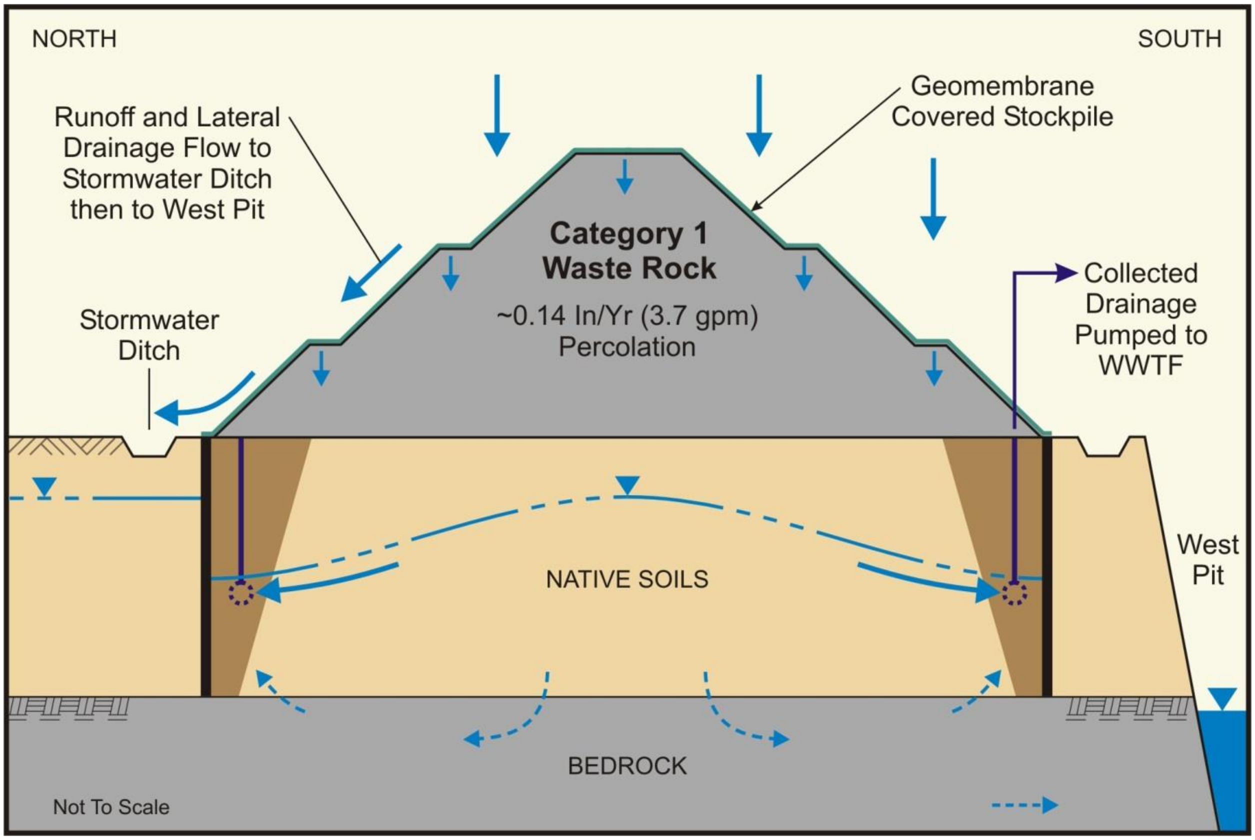

Figure 3 Conceptual Representation of Category 1 Waste Rock Stockpile Groundwater Containment System – Long-Term Closure Conditions Cross-Section

The groundwater flow model used to assess the performance of the containment system is a three-dimensional MODFLOW model (Reference (3)). The model was set up to simulate groundwater flow within the stockpile, the surficial deposits and the bedrock and is used to evaluate how much drainage will be captured by the containment system and how much will pass below the containment system.

The active model grid covers an area of approximately 14 square miles. The largest model cell size is 156 meters by 156 meters near the perimeter of the model, with a much smaller cell size of 10 meters by 10 meters used around the immediate vicinity of the stockpile. The model was vertically discretized into 9 layers; layer 1 represents the Category 1 Waste Rock Stockpile, layer 2 represents the surficial deposits, and layers 3 through 9 represent the bedrock. The top of layer 2 was set the same as the Mine Site MODFLOW model, using project topographic data at the Mine Site and larger scale elevation data outside the Mine Site. The top of layer 3 was based on the project bedrock map at the Mine Site and larger scale bedrock mapping outside the Mine Site. The base elevations of layers 3 through 9 correspond to the base elevations of model layers representing bedrock in the Mine Site MODFLOW model (Attachment C of Reference (2)).

The perimeter boundaries of the model are a simplified derivation of results from the Mine Site model and establish the regional groundwater flow field (Figure 4). The northern boundary of the model is a constant-head boundary set within the One Hundred Mile Swamp wetland complex. The eastern and southern boundaries are constant-head boundaries representing the Partridge River. The southwestern boundary consists of constant-head cells representing Wetlegs Creek. No-flow cells comprise the northwestern boundary of the model, which is positioned approximately perpendicular to the head contours from the Mine Site Model (Attachment C of Reference (2)) in this area. Wetlands within the model domain are represented with river cells with the head elevation equal to the ground surface (Figure 4).

The containment system drain pipe is represented in the model with drain cells. The elevation of the drain cells was set at the design elevations (Drawing GCS-012 to Drawing GCS-014 in Attachment C of Reference (1)). The conductance of the drain cells was calculated based on the length of the drain within the cell and an assumed fill material dimension around the drain of 2.4 meters by 2.4 meters, with a hydraulic conductivity of 50 meters/day. Containment system drain cells were assigned to either model layer 2 or 3 based on the drain elevation.

The cutoff wall was simulated using the Horizontal-Flow Barrier (HFB) Package for MODFLOW (Reference (4)). The cutoff wall conductance was calculated using an assumed thickness of 5 feet and a hydraulic conductivity of $1x10^{-5}$ cm/sec.

Drainage out of the toe of the stockpile was simulated with drain cells. Drain cells were set at an elevation of 0.1 meters above the existing surface elevation along the edge of the stockpile.

All pertinent model parameters are shown in Table 1.

Preliminary modeling was conducted using only steady-state solutions. Results from these models indicated that the vertical component of groundwater flow, influenced by a combination of high recharge over the open Category 1 Waste Rock Stockpile and drawdown from pit dewatering, was overestimated by considering steady state only. These conditions (high recharge and dewatering) are only short-term and are not accurately reflected in a steady-state model. Subsequent modeling described below was done with transient solutions to better reflect changes in the groundwater flow field over the period of mine operations and reclamation. However, for simulations of long-term closure, the model was still run with a steady-state solution, because conditions will approach a steady state over the long-term.

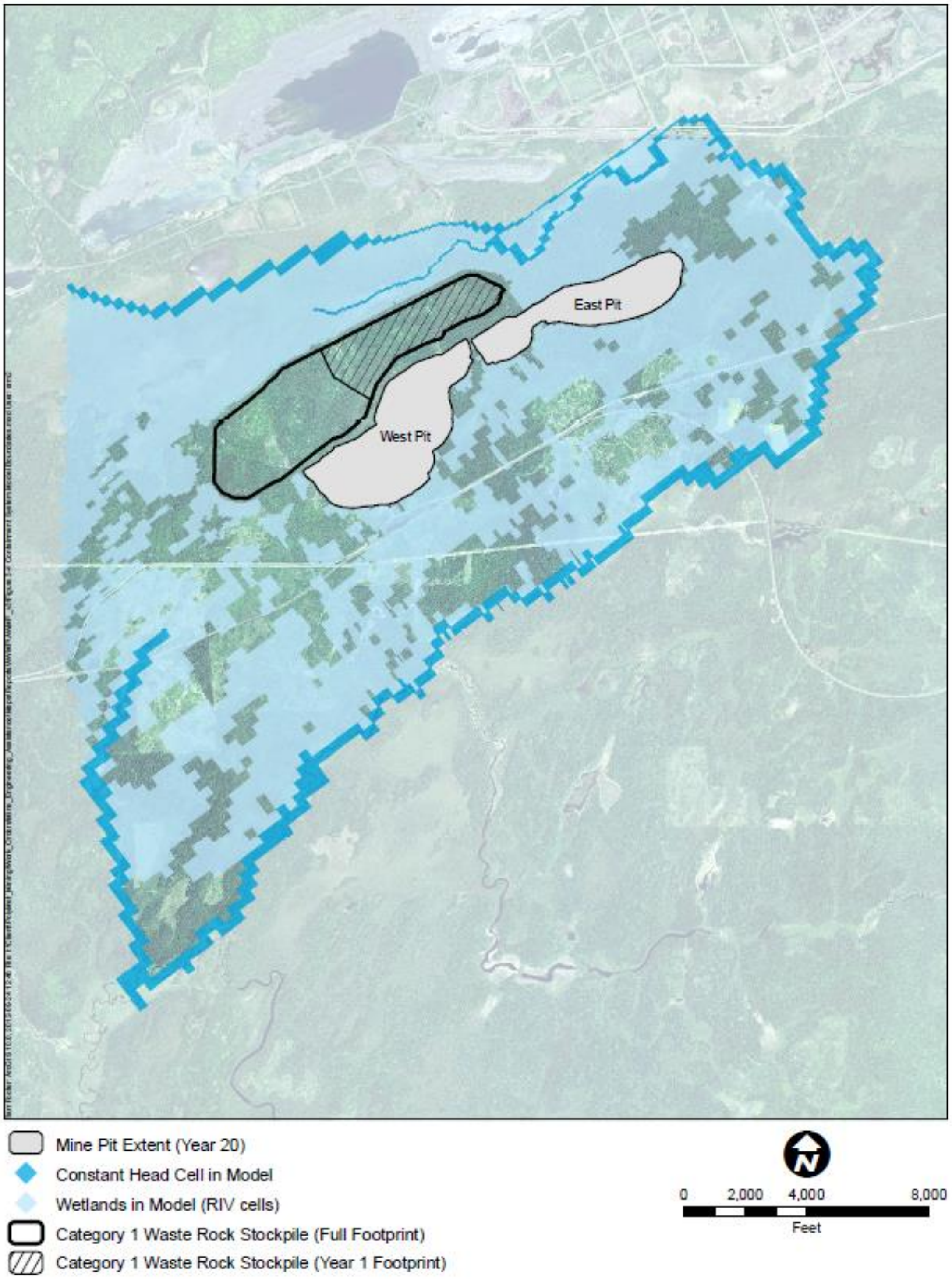

Figure 4 Perimeter Boundaries of Category 1 Waste Rock Stockpile Groundwater Containment System MODFLOW Model

Table 1 Key Category 1 Waste Rock Stockpile Groundwater Containment System MODFLOW Model Parameter Values

Parameter	Value	Units	Data Source
Recharge for wetland deposits	1.8	inches per year (in/yr)	Mine Site MODFLOW Model(1)
Recharge for glacial drift	0.36	in/yr	Mine Site MODFLOW Model(1)
Infiltration over active stockpile area	13.6	in/yr	Value from Section 6.1 of Reference (5)
Drainage though geomembrane stockpile cover	0.14	in/yr	Modeled mean percolation from Figure 3-6 of Reference (6)
Hydraulic Conductivity – Waste Rock	$K_x = K_y = K_z = 259$	meters per day (m/d)	NorthMet Geotechnical Data Package – Volume 3, v3 (Reference (7))
Horizontal Hydraulic conductivity – Glacial drift	Range: 0.017 - 51.0 Mean: 5.8	m/d	Values and distribution from Mine Site MODFLOW Model(1)
Horizontal Hydraulic Conductivity – Wetland deposits	Range: 0.001 - 68.2 Mean: 7.2	m/d	Values and distribution from Mine Site MODFLOW Model(1)
Vertical hydraulic conductivity – Glacial drift and wetland deposits	0.000864	m/d	Mine Site MODFLOW Model(1)
Hydraulic conductivity – Giants Range Batholith	$K_x = K_y = 0.0089$ $K_z = 8.9 \times 10^{-4}$	m/d	Mine Site MODFLOW Model(1)
Hydraulic conductivity – Biwabik Iron Formation	$K_x = K_y = 0.26$ $K_z = 0.026$	m/d	Mine Site MODFLOW Model(1)
Hydraulic conductivity – Virginia Formation, Upper Portion	$K_x = K_y = 0.094$ $K_z = 0.0094$	m/d	Mine Site MODFLOW Model(1)
Hydraulic conductivity – Duluth Complex	$K_x = K_y = 1.4 \times 10^{-4}$ $K_z = 1.4 \times 10^{-5}$	m/d	Mine Site MODFLOW Model(1)
Hydraulic conductivity – Virginia Formation, Lower Portion	$K_x = K_y = 0.024$ $K_z = 0.0024$	m/d	Mine Site MODFLOW Model(1)
Specific Storage – Waste Rock	1×10^{-5}	$meter^{-1}$ (m^{-1})	Assumed value
Specific Storage – Bedrock, all units	1×10^{-5}	m^{-1}	Mine Site MODFLOW Model(1)
Specific Storage – Unconsolidated sediments	1×10^{-5}	m^{-1}	Mine Site MODFLOW Model(1)
Specific Yield – Waste Rock	23	Percent	Assumed value equal to porosity
Specific yield – Bedrock, all units	5	Percent	Mine Site MODFLOW Model(1)
Specific yield – Unconsolidated sediments	10	Percent	Assumed value

Parameter	Value	Units	Data Source
Porosity – Waste Rock	23	Percent	Value from Section 4.2 of Reference (7)
Porosity – Bedrock, all units	1	Percent	Assumed value
Porosity – Unconsolidated sediments	25	Percent	Assumed value

(1) Attachment C of Reference (5)

The model was run under a transient condition with yearly stress periods (a stress period is the time period over which model inputs are held constant) for Mine Year 1 to Mine Year 40 and a 15-year stress period from Mine Year 41 to Mine Year 55. These stress periods were developed to capture the dynamic changes in the groundwater flow system as the mine pits are dewatered and filled and the stockpile is either open or reclaimed. A steady-state simulation of current conditions was used to define the initial conditions for the transient simulation. For each stress period, mine pit depths were determined from contours of the pit shell developed for Mine Years 1, 2, 11, and 20; pit elevations between these years were linearly interpolated. The pit-filling sequence was based on the Mine Site water model (Reference (2)). For simplicity and to overcome limitations on how MODFLOW can simulate the building of the waste rock stockpile, it was assumed that the entire footprint of the stockpile was present and open starting in Mine Year 1. The waste rock stockpile was incrementally covered (to simulate the cover system construction sequence described in Section 7.1 of Reference (1)) by specifying different recharge rates in MODFLOW starting at the beginning of Mine Year 14 and ending at the end of Mine Year 21. A final steady-state model run was conducted with the mine pits full of water and the Category 1 Waste Rock Stockpile reclaimed to represent long-term closure.

The combination of the transient simulation and the steady-state, long-term closure simulation allows for assessment of the performance of the containment system under all expected groundwater flow regimes (e.g., drawdown and subsequent filling of the pits, open and reclaimed stockpile and long-term closure). The particle-tracking code MODPATH (Reference (8)) was used to track particles of water originating as drainage from the stockpile. At each model cell within the footprint of the stockpile, a particle was released at the water table at the beginning of Mine Years 1, 10, 20, 30 and 40 of the transient simulation. For Mine Year 1, the particles were released over the stockpile footprint that would exist during Mine Year 1 (Figure 4); particles were released over the full stockpile footprint during all other years. A total of 8,103 particles were released for Year 1; 20,798 particles were released for all other years. All particles were tracked until they reached a groundwater discharge location (e.g., containment system, mine pits, or offsite wetland/stream). Particles that remained active after the 55-year transient simulation (i.e., had not yet exited the groundwater flow system) were tracked through the long-term, steady-state simulation until they reached a groundwater discharge location. An additional complete set of particles were also tracked using the steady-state simulation representing long-term closure.

Modeling Results

The performance of the Category 1 Waste Rock Stockpile Groundwater Containment System was assessed by summarizing the number of particles that exited the groundwater flow system at each groundwater discharge location. Representative volumes of Category 1 Waste Rock Stockpile drainage discharging at each location were determined using the drainage rate through the stockpile at the time the particles were released and the area of the cell where the particle was released. The results of this assessment are shown in Table 2.

As shown in Table 2, the model simulations indicate that the containment system is capable of capturing between 91% and >99% of the drainage from the Category 1 Waste Rock Stockpile over the life of the mine and during long-term closure. The majority of the remaining drainage eventually flows to the mine pits. A small percentage of the stockpile drainage, less than 1% to 2% (<0.01-6 gpm) during operations and less than 1% (<0.01 gpm) during reclamation and long-term closure, is not captured in the containment system or the mine pits and is estimated to flow off site.

The majority of the particles not captured by the Category 1 Waste Rock Stockpile Groundwater Containment System or the pits follow deep and long (over 1,500 years) bedrock flow paths to the south, east, and southeast. These potential uncaptured flows are not significant due to the relatively small volumes of groundwater that these flow paths represent and the extremely long travel time relative to the water quality modeling period of 200 years. However, the potential flows from the Category 1 Waste Rock Stockpile to bedrock south, southeast, and east of the West Pit, along with outflow from the West Pit, are included in the Mine Site water quality model to determine potential impacts from this groundwater to downgradient surface water.

When the stockpile is uncovered, the model is estimating that there is some potential for a very small amount of stockpile drainage (0.2 gpm) to flow underneath the containment system and discharge to the adjacent wetlands in areas along the northeast and northwest sides of the stockpile. These areas will be investigated prior to construction of the corresponding segment of the containment system. If field conditions, particularly depth to bedrock, are similar to modeling assumptions, the design of the containment system may be modified to account for capture at lower elevations or to include groundwater extraction wells that will collect water from a greater depth than the containment system is currently modeled to collect water.

Table 2 Category 1 Waste Rock Stockpile Drainage Modeling Results

Particle Starting Year	Capture Location	% Capture	Representative Flow Rate (gpm)
Mine Year 1	Containment System	>99%	140 gpm
	West Pit	0%	0 gpm
	East Pit	<1%	<1 gpm
	Uncaptured	<1%	<0.1 gpm
Mine Year 10	Containment System	91%	329 gpm
	West Pit	6%	21 gpm
	East Pit	2%	6 gpm
	Uncaptured	2%	6 gpm
Mine Year 20	Containment System	95%	4 gpm
	West Pit	4%	<1 gpm
	East Pit	<1%	<0.01 gpm
	Uncaptured	<1%	<0.01 gpm
Mine Year 30	Containment System	95%	4 gpm
	West Pit	5%	<1 gpm
	East Pit	<1%	<0.01 gpm
	Uncaptured	<1%	<0.01 gpm
Mine Year 40	Containment System	95%	4 gpm
	West Pit	5%	<1 gpm
	East Pit	<1%	<0.01 gpm
	Uncaptured	<1%	<0.01 gpm
Long-Term Closure (Steady State)	Containment System	95%	4 gpm
	West Pit	5%	<1 gpm
	East Pit	<1%	<0.01 gpm
	Uncaptured	<1%	<0.01 gpm

References

1. **Poly Met Mining Inc.** NorthMet Project Rock and Overburden Management Plan (v7). December 2014.

2. —. NorthMet Project Water Modeling Data Package Volume 1 - Mine Site (v13). December 2014.

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6. —. NorthMet Project Adaptive Water Management Plan (v6). January 2015.

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Attachment F

Overliner Stress Calculations – PLACEHOLDER

Attachment G

Overliner Piping Design Calculation – PLACEHOLDER

Attachment H

Construction CQA Plan – PLACEHOLDER