

SUMMARY AUDIT REPORT
INTERNATIONAL CYANIDE MANAGEMENT CODE
GOLD MINING OPERATION
APPLICABILITY DETERMINATION FOR CLOSURE AUDIT
EL SAUZAL MINE, CHIHUAHUA, MEXICO



Submitted to

**INTERNATIONAL CYANIDE MANAGEMENT
INSTITUTE**

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and

**GOLDCORP INC. / MINAS DE LA ALTA
PIMERÍA S.A. DE C.V.**

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UNITS OF MEASURE AND ABBREVIATIONS

ADR	Adsorption, Desorption and Recovery
Chemours	The Chemours Company
CIP	Carbon-in-pulp
Code	International Cyanide Management Code
CONAGUA	National Water Commission (Comisión Nacional Del Agua)
CRETI	Corrosive-Reactive-Explosive-Toxic-Inflammable
DSTMA	Dry Stack Tailings Management Area
DuPont	DuPont De Nemours & Co., Inc.
Goldcorp	Goldcorp Inc. and Goldcorp Mexico, Minas de la Alta Pimería S.A. de C.V.

UNITS OF MEASURE AND ABBREVIATIONS (CONTINUED)

HDPE	High-density polyethylene
ICMC	International Cyanide Management Code
ICMI	International Cyanide Management Institute
km	Kilometer(s)
mg/L	Milligrams per liter
mm	Millimeter(s)
PMP	Probable Maximum Precipitation
PROFEPA	Federal Environment Protection Agency (Procuraduría Federal De Protección Al Ambiente)
SAG	Semi-Autogenous Grinding
Segutal	Transportes Especializados Segutal S.A. de C.V.
SEMARNAT	Secretary of the Environment, Natural Resources and Fisheries (Secretaría de Medio Ambiente Recursos Naturales)
WAD	Weak-acid dissociable

0.0 GENERAL

0.1 Operation Contact Information

Name of Mine:	El Sauzal Mine
Name of Mine Owner:	Goldcorp Inc.
Name of Mine Operator:	Minas de la Alta Pimería S.A. de C.V
Name of Responsible Manager:	Bill Humphrey, Mine General Manager
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0.2 Location and Ownership

The El Sauzal Mine is operated by Goldcorp Mexico, Minas de la Alta Pimería S.A. de C.V. (“Goldcorp”), a wholly-owned subsidiary of Goldcorp, Inc. (“Goldcorp”) and has been in commercial operation since December 2004. Goldcorp initiated mine closure activities in late 2014, which were ongoing at the time of this writing. The El Sauzal Mine was the first gold mining operation located in Mexico certified to the International Cyanide Management Code (“ICMC” or “Code”). The mine received its initial certification on March 27, 2008 and its latest recertification on December 23, 2014. El Sauzal will be the first gold mine in the world to be decommissioned in accordance with the ICMC.

El Sauzal is an open-pit operation located in Mexico in a remote area of southwestern Chihuahua State, approximately 450 kilometers (“km”) south of the United States/Mexico border, 250 km southwest of the state capital Chihuahua City, and 15 km east of the Sinaloa State line (see **Figure 1**). More precisely, the El Sauzal Mine is located in Urique Municipality, Chihuahua, approximately 23 km in a straight line south of the town of Urique and 15 km from the town of Batopilas. The Town of Urique is the district center.

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Access to the mine is via highway from the city of Los Mochis located near the Pacific Coast at the intersection of Highway 15 and Highway 23 to the City of Choix along Highway 23. A 100-km long access road, constructed by Goldcorp, extends from Choix to the mine. Additionally, the site has an unpaved airstrip, which accommodates small aircraft, primarily flying to and from Chihuahua City and Hermosillo.



The El Sauzal Mine is located in rugged terrain varying in elevation from 500 to 700 meters above the Urique River, a tributary river on the west side of the Sierra Madre mountain range. The area surrounding the mine is sparsely populated due to the rugged terrain. There are approximately 22 communities within approximately 100 km of the mine, although the majority of these communities are small, varying from only hundreds to a thousand residents. The largest community is Choix with a population of approximately 20,000 residents.

Mean annual precipitation at the site is approximately 800 millimeters (“mm”), concentrated in the months of June through July. On average, 250 mm of this precipitation occurs in the month of July, the wettest month of the year. May is the driest month of the year, with an average of four (4) mm of precipitation. On average, precipitation occurs 55 days per year. Mean annual evaporation is approximately 2,400 mm and average monthly evaporation exceeds average monthly precipitation for all months of the year.

The El Sauzal Mine is located in Hydrological Region 10 (Rio Fuerte) near the Urique River, approximately 10 km from the point where it joins Fuerte River. Drainage from the majority of the mine site area flows towards the

Urique River. There is no available hydrogeology data for the overall site in general; however, the condemnation borehole drilled at the process plant location did not encounter groundwater to its full depth.

0.3 Description of Operation before Decommissioning

During operation, the El Sauzal mine employed conventional open-pit mining methods and a cyanide leach milling process for gold recovery. Four (4) open pits were developed using loaders to remove waste rock and extract gold-bearing ore. Trucks transported the ore to the crushing circuit and the waste rock to five (5) waste rock storage areas.

A milling circuit was employed to reduce ore via a Semi-Autogenous Grinding (“SAG”) mill followed by a ball mill prior to leaching and carbon-in-pulp (“CIP”) processing, which was followed by an Adsorption, Desorption and Recovery (“ADR”) processing plant to recover gold and silver. The metal was further refined in a smelting furnace and shipped off site as doré bars for further refining and sale. The process circuits resided within concrete secondary containments that cascaded to the tailings detoxification plant (Cyanide Destruction Circuit) and Tailings Filtration Plant with upset overflow to the synthetic-lined Emergency Pond.

Processed tailings were subjected to cyanide destruction using both Caro’s acid and INCO SO₂ processes followed by pressure filtration to produce a moist filter cake with negligible cyanide in the pore water. The Cyanide Destruction Circuit treated slurry to reduce cyanide concentrations from approximately 150 milligrams per liter (“mg/L”) free cyanide to below 2 mg/L total cyanide. A conveyor system transported the filter cake from the Tailings Filtration Plant to a stacker located within the Dry Stack Tailings Management Area (“DSTMA”). There was no open water associated with the dry stack tailings.

The El Sauzal Mine received solid sodium cyanide from The Chemours Company (“Chemours”), formerly DuPont De Nemours & Co., Inc. (“DuPont”), delivered to the site in flobins within transport containers. The flobins were stored inside an enclosed metal building with a metal roof and concrete floor.

0.4 Cyanide Facilities

Goldcorp completed decommissioning activities associated with the El Sauzal cyanide facilities in July 2015 (see **Section 0.5** below). Therefore, the El Sauzal Mine currently has no active cyanide facilities.

The cyanide facilities that were active prior to decommissioning activities are as follows:

- Cyanide Storage Warehouse
- Cyanide Preparation Area
- Milling Circuit
- Leaching Circuit
- CIP Circuit
- ADR Plant
- Cyanide Destruction Circuit
- Tailings Filtration Plant

- Dry Stack Tailings Management Area (DSTMA)
- Emergency Pond
- Stormwater Diversions; and
- Associated concrete and lined secondary containment structures, sumps, process solution transfer pipes, valves, and pumps.

0.5 Decommissioning Program Overview

This section of the audit report describes the El Sauzal Decommissioning Program framework and the activities performed to decommission the cyanide facilities. **Section 1.0** through **Section 9.0** of this report addresses each specific ICMC Principle and the corresponding Standards of Practice. The findings presented in Sections 1.0 through 9.0 are based on evidence summarized in this section.

0.5.1 ICMC Decommissioning and Closure Audit Requirements

The Code defines decommissioning as:

“The activities conducted to treat, neutralize or otherwise manage cyanide and cyanide containing process solutions remaining in storage and production facilities in preparation for closure so that they do not present a risk to people, wildlife or the environment due to their cyanide content. Decommissioning includes decontamination of equipment, removal of residual cyanide reagents, rinsing of heap leach pads and installation of measures necessary for control or management of surface or ground water, such as pumping and treatment systems that would operate during the facility's closure period. Decommissioning does not include activities such as physical stabilization of tailings storage facilities (TSF) or heaps, revegetation of disturbed land or long-term management of seepage from leaching facilities or TSFs or environmental monitoring.”

The findings presented in this audit report provide verification that Goldcorp has successfully decommissioned the El Sauzal cyanide facilities in accordance with this definition. Nonetheless, the Code does not require certified mines to undergo decommissioning or closure audits. Participation in the Code is voluntary; therefore, mines can withdraw from the program at any time and for any reason. Moreover, a mine is no longer subject to Code certification after decommissioning of its cyanide facilities. A certified mine has three (3) options as gold production ends, which include:

- 1) **Withdrawal from the Cyanide Code:** A certified mine can elect to withdraw from the Code program rather than getting its next triennial certification audit by submitting an updated signatory application form to the International Cyanide Management Institute (“ICMI”). Although no reason for the withdrawal is required, the signatory can indicate that the operation is nearing the end of production, is in its decommissioning phase or has fully decommissioned all cyanide facilities and therefore is no longer subject to the Code.

- 2) **Certification prior to or during decommissioning:** An operation can be audited prior to or during its decommissioning and it can be certified in compliance with the Code as long as cyanide facilities remain on site. The audit would determine if remaining cyanide facilities and their management continue to be compliant with the Code during decommissioning, and document those aspects of the mine that are no longer subject to the program. As with all certifications, the Summary Audit Report and Auditor Credentials Form would be posted on the ICMC website demonstrating to stakeholders that the mine maintained compliance with the Code as it was decommissioned.

- 3) **Audit after decommissioning:** A mine that has been decommissioned can be audited to determine if cyanide facilities remain on site or if the Code is no longer applicable. If the auditor determines that cyanide facilities no longer exist, the audit report can document the evidence supporting this finding for each Principle and Standard of Practice and demonstrate that the risks related to cyanide have been minimized to the point that the Code no longer applies. The mine’s decommissioning cannot be certified because it is no longer within the scope of the ICMC program. However, at the signatory’s request, ICMI can post the Summary Audit Report and Auditor Credentials Form along with an announcement that the operation has been withdrawn from certification.

This *Applicability Determination for Closure Audit* was conducted following full decommissioning of the El Sauzal cyanide facilities (option No. 3 above) in order to verify that all ICMC Principles and corresponding Standards of Practice provided in the *ICMI Gold Mining Operations Verification Protocol* no longer apply to the El Sauzal Mine. Accordingly, the objective of the audit was to determine if cyanide facilities remain on site or if the El Sauzal Mine is no longer subject to the Code. At the time of this writing, an *Applicability Determination for Closure Audit* had not been conducted for any ICMC Signatory Companies or operations listed for certification.

ICMC recertification audits typically focus on verifying an operation’s continued compliance with the Code over the three-year period between audits. However, because the El Sauzal Mine was recently recertified as being in full compliance with the Code, this final audit serves exclusively to verify that the El Sauzal Mine is no longer subject to the Code rather than to verify that the operation has or is meeting all of the Code Principles and Standards of Practice. Consequently, this audit does not reconsider determinations from the 2014 recertification audit. The auditor placed particular emphasis on evaluating measures implemented by Goldcorp to decommission the El Sauzal cyanide facilities and remove residual cyanide reagents pursuant to Code requirements, which included evaluating the need to install measures necessary to control or manage surface or ground water such as surface water diversions and pumping and treatment systems that would operate during the mine’s closure period. Additionally, the auditor evaluated whether cyanide is still being transported to the El Sauzal site, stored on site, or used on site for the recovery of gold.

Because the Code is only concerned with decommissioning of cyanide facilities, the auditor did not evaluate the need for or performance of any ongoing closure or post-closure facility inspections, maintenance and environmental monitoring programs; or water management activities; only that necessary water management systems are in place, if warranted.

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0.5.2 El Sauzal Closure Plan

The *El Sauzal Closure Plan* (dated May 2011) presents the general closure activities proposed for the entire mine site. The Closure Plan describes measures to fully close the mine facilities, process facilities and site infrastructure. The mine facilities covered by the Closure Plan include the mine pits, waste rock storage areas and ore stockpiles. Site infrastructure covered by the Closure Plan includes electrical equipment, water systems, the maintenance shop, administration offices, mine camp, miscellaneous buildings and ancillary facilities, diversion channels and the crushing and screening circuit.

Relevant to the ICMC, Section 6.0 of the Closure Plan presents the general closure activities for all process facilities, which encompass the El Sauzal cyanide facilities. More specifically, the process facilities covered by the Closure Plan include the DSTMA, Emergency Pond, cyanide and chemical storage, assay lab, refinery, and process circuits including equipment, tanks, mills, filtration components, steel sumps, piping, pumps, process buildings and interior fixtures, and concrete foundations.

Following is a brief summary of the closure activities for the various process components, as presented in the 2011 El Sauzal Closure Plan.

DSTMA

The DSTMA is located immediately south and west of the plant site. The facility design and construction includes the following elements:

- A rock-fill berm with compacted tailings placed as structural fill at the downgradient side of the DSTMA to provide containment;
- A rock-fill diversion dam with compacted tailings at the upgradient side of the DSTMA to divert the upper catchment area;
- A sediment pond downgradient of the DSTMA with an overflow spillway excavated in natural rock;
- A concrete-encased riser pipe (bypass outlet) in the main drainage to route run-off from the upper catchment area through the bottom of the DSTMA to the downstream toe of facility for release to a downgradient sediment pond; and
- Rock-fill underdrains to collect seepage and surface run-off from the base of the DSTMA and route it to the sediment pond.

Goldcorp placed tailings within the DSTMA using two methods: compacted and uncompacted. During the dry season, tailings were typically placed, with truck and loader, in the areas (compacted areas) adjacent to the upgradient or downgradient berms and compacted for stability. During the rainy season, tailings were placed by overland conveyor and/or dozers in the center between the compacted areas of the DSTMA (uncompacted areas). The surface area of the DSTMA in its final configuration is approximately 26 hectares (64 acres).

The Closure Plan describes decommissioning of the DSTMA in accordance with applicable permit conditions and corporate guidelines based on Goldcorp's experience gained during operation and successful decommissioning and closure of similar facilities. Because of the nature of the tailings material, Goldcorp planned to close the DSTMA as a "zero discharge facility". The planned general guidelines and objectives for decommissioning the DSTMA include:

- Re-contouring – physical stability
 - Minimize erosion;
 - Maximize slope stability;
 - Minimize and control run-on; and
 - Maximize and control run-off.
- Covering and revegetating – chemical and physical stability
 - Minimize erosion;
 - Minimize infiltration;
 - Reduce DSTMA contact water volumes;
 - Minimize and control run-on;
 - Maximize run-off; and
 - Maximize plant transpiration.
- Evapo-transpiration cell construction – chemical stability
 - DSTMA contact water or draindown water disposal

The out slope areas of the DSTMA are covered with non-acid generating waste rock from the mine pits and are constructed at the final reclaimed slope configuration. The waste rock material functions as erosion protection. According to the Closure Plan; the flat surface areas (top) of the DSTMA may require re-contouring depending on the cover design requirements; it is anticipated that the flat surface areas will be contoured to promote the passive removal of meteoric water, which will limit infiltration; based on laboratory testing, surface subsidence should be minimal or nonexistent; and once complete, the facilities may be covered with growth media and revegetated to further limit infiltration of meteoric water.

The pre-construction and updated engineering designs for the DSTMA adequately address short- and long-term stability for slope failure during operations (short-term) and after decommissioning (long-term). Several slope configurations determined to be “critical slopes” were analyzed for stability. This analysis evaluated the interaction of several slope factors under varying scenarios and determined that the facility met or exceeded all design criteria and will be stable in both short-term and long-term configurations.

Emergency Pond

The Emergency Pond consists of a single synthetic-lined pond, which served as excess capacity to meet emergency conditions during operations. The pond received process water from the process circuits during upset conditions via a gravity-flow pipeline connecting the process area with the pond. Following process upsets, solution was removed from the pond and returned to the process circuit as soon as possible via a dedicated pumping system. The El Sauzal Closure Plan provides a discussion of closure measures planned for the Emergency Pond, as discussed below.

Following evaporation of liquid from the pond, any sludge in the pond will be analyzed using appropriate testing procedures. If the results are within regulatory limits, the sludge may remain in place. If the sludge does not meet regulatory limits, other options will be developed. These options may include burial within the pond with an

earthen cover, burial with the liner in place and construction of a synthetic lined cover over the sludge, removal of the sludge for disposal within an approved containment structure, or other methods. The existing pond liner will then be folded into the pond and buried with a minimum of five feet of fill material and the area will be graded to promote drainage away from the facility. Growth media will be placed over the fill and seeded.

Cyanide / Chemical Storage Facilities

On-site chemical storage for cyanide, pebble lime, caustic soda, hydrochloric acid, flocculants, ammonium nitrate and dust suppressant is accomplished using various types of containers such as; tanks, bins, vats and vessels. During closure of the processing plants, chemical storage containers will be emptied, with the contents consumed, removed and/or transported to an approved facility or returned to the vendor. Disposal will be tracked according to company procedures for disposal of hazardous materials, as appropriate. Upon final closure, the containers will be triple rinsed, with resulting rinse solution removed to an approved containment facility. Containers will be sold, recycled, cut up and/or crushed and buried in an approved on-site facility.

Assay Lab and Refinery

Refractory linings of fire assay furnaces will be removed and shipped to an approved off-site facility for the handling of lead contaminated wastes. Upon site decommissioning, all chemicals from the refinery will be consumed, removed from the site to an approved disposal location or sold. Equipment related to the production of gold/silver doré will be cleaned of residual dust and contaminants, and dismantled, sold or disposed of in an approved on- or off-site facility, as appropriate. Ventilation equipment will be removed and dusts found in the system may be collected and removed from the site to an approved disposal location and/or sold.

Process Tanks, Mills, Filters and Steel Sumps

These facilities include numerous tanks utilized in the process circuits and the Cyanide Destruction Circuit, the milling and Tailings Filtration Plant equipment, and the numerous sumps in the process areas. During decommissioning of the processing facilities, equipment and tanks will be emptied and triple rinsed of all remaining process chemicals and sludge, with the resulting solution evaporated within an approved containment area. Tank closure will consist of triple rinsing and removing related process scale, piping and pumps, and dismantling the tank. Tanks will be sold, recycled, or cut up and/or crushed and buried in an approved on-site facility.

Process Piping

During decommissioning of the processing facilities, the process piping contained within the facilities will be triple rinsed or stabilized with appropriate chemicals. The resulting solution will be removed to an approved containment area. Closure for this piping will entail cutting the piping into sections and burying the steel and/or high-density polyethylene piping ("HDPE") in designated areas such as the DSTMA or in an approved on-site facility.

Once stabilized surface pipelines will be removed to be recycled, sold as scrap or buried in an approved on-site facility. Once stabilized, buried pipelines will be drained and left in place. The exposed ends will be buried to a minimum depth of 46 centimeters (18 inches) below the recontoured surface and the ends will be capped or plugged.

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Process Pumps and Equipment

During decommissioning of the processing facilities, the process pumps, contained within the processing facilities, will be triple rinsed or stabilized with appropriate chemicals. The resulting solution will be removed to an approved containment area. Closure for these pumps will entail either selling or recycling the steel pumps and electric motors or burying the pumps in an approved on-site facility.

Upon decommissioning, all chemicals from these facilities will be consumed, removed from the site to an approved disposal location or sold. Equipment exposed to hazardous chemicals will be triple rinsed prior to removal. Rinse water will be removed to an acceptable containment facility. Equipment will be dismantled and sold, recycled for scrap or buried in an approved on-site facility.

Building and Interior Fixtures

Process buildings at the El Sauzal Mine are typically steel frame structures covered with metal roofing on concrete foundations. Upon removal of process equipment as outlined above, the buildings and interior fixtures, decking, steel stairways, steel doorways, aluminum materials, and electrical equipment, may be triple rinsed or stabilized with appropriate chemicals depending on their exposure to cyanide or other hazardous chemicals. Once determined to be chemically stable, the buildings and interior fixtures will be dismantled, with the steel structure sold, recycled or buried in an approved on-site facility.

Concrete Foundations

Concrete foundations that have been exposed to cyanide or other hazardous chemicals will be triple rinsed. The rinse solution will be placed in an approved containment. Upon final cleaning of the foundations, the concrete will be reclaimed either by directly burying the concrete or by breaking up the concrete before burying to avoid ponding of water. In both cases, the area will be covered with growth media and seeded.

0.5.3 Process Plant Decontamination Report

During 2014, Goldcorp began reclamation and closure activities as part of the El Sauzal Mine closure process planned for completion in the second quarter of 2016. Reclamation activities conducted in 2014 focused on recontouring the waste rock storage areas, revegetating disturbed areas, and final placement of tailings at the DSTMA. Goldcorp completed decommissioning of the El Sauzal cyanide facilities in July 2015 and plans to complete full closure of the processing facilities by the second quarter of 2016.

Goldcorp’s Environmental Standard EP 13, *Reclamation and Closure Planning (March 2014)* has been formally adopted as the Corporate standard and implementation guideline for mine closure. This Standard allows Goldcorp mining operations to comply with all applicable local laws and regulations and international guidelines, and results in returning mine sites to long-term safe and stable conditions.

As outlined in the Standard, Goldcorp operations must prepare a final decommissioning plan for submittal to regulatory agencies as appropriate. Therefore, near completion of decommissioning the El Sauzal process facilities, Goldcorp prepared the *Process Plant Decontamination Report* (dated June 2015), which describes the actual decommissioning activities that Goldcorp conducted to treat, neutralize or otherwise manage cyanide and cyanide containing process solutions remaining in storage and process facilities in preparation for closure.

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Goldcorp submitted the Decontamination Report to the Mexican federal regulatory agencies, which include the Secretary of the Environment, Natural Resources and Fisheries (Secretaría de Medio Ambiente Recursos Naturales or “SEMARNAT”); National Water Commission (Comisión Nacional Del Agua or “CONAGUA”); and Federal Environment Protection Agency (Procuraduría Federal De Protección Al Ambiente or “PROFEPA”).

The Decontamination Report describes the decommissioning activities that Goldcorp had implemented as of June 2015. The only decommissioning activity remaining at that time was transfer of residual rinse solution from the process circuits to the surface of the DSTMA for evaporation, which occurred in July upon regulatory approval. Following is a summary of those decommissioning activities for the El Sauzal cyanide facilities as presented in the June Decontamination Report.

Cyanide Preparation Area

In late December 2014, Goldcorp emptied the Sodium Cyanide Mixing Tank and the Sodium Cyanide Storage Tank and began neutralizing, decontaminating and washing the two tanks using caustic soda and sodium hypochlorite. Goldcorp followed its written procedure, “Decontamination of Closed Tanks” and the Decontamination Report includes the detailed steps implemented.

During emptying, the tanks were drained to the concrete containment sump and the solution was pumped to the Mill thickener. After rinsing repeatedly for six (6) cycles, using the tank agitators to thoroughly mix the neutralizing solution, the residual rinse solution was pumped to the leach tanks and combined with the residual rinse solution from the other process circuits.

On 22 February 2015, Goldcorp completed rinsing both tanks and the sumps and concrete containment areas, thus ending decommissioning activities for the Cyanide Preparation Area.

Process Circuits

In late December 2014, Goldcorp began lowering the percent solids contained in the leach tanks by pumping the pulp to the Tailings Filtration Plant, which continued normal operation into early January 2015 until filtering of the remaining solids in solution was complete. Final transferring and stripping of carbon from the CIP circuit occurred between December 29, 2014 and January 2, 2015, which involved three strip cycles. Following each strip cycle, the ADR circuit was rinsed with fresh water and the rinse water was then transferred to the Mill thickener. On January 8, 2015, the ADR circuit received a final rinse with fresh water; thus, in total, the ADR facilities were rinsed four times.

In early January 2015, the CIP tanks were drained to the concrete containment floor and the carbon and sediment was placed into nylon super sacks. Following emptying, the CIP tanks were thoroughly cleaned. In February 2015, Goldcorp shipped the 84 super sacks containing loaded carbon to an offsite refinery for recovery of gold. At the time of the field component of this ICMC *Applicability Determination for Closure Audit*, super sacks containing new and reactivated carbon were stored on site near the ADR Plant, which will be sold to Goldcorp’s Los Filos Mine in Mexico.

In January 2015, Goldcorp initiated recirculation of rinse solution through the process circuits. Between January 10 and 22, rinse solution was circulated, in a closed loop, from the milling circuit through the entire process circuit with the exception of the elution (carbon wash and strip) circuit at the ADR Plant and the tailings filtration circuit. A new pipeline was installed connecting the pumps at the discharge of Cyanide Destruction Circuit to the process solution feed pumps in order to recirculate the rinse solution throughout all the circuits containing cyanide. Fresh and process water was fed to the tanks at the Cyanide Destruction Circuit while Caro's acid and sodium metabisulfite, mixed with copper sulfate, was also fed to the tanks as in normal operation. Overflow from these tanks was directed to the solution spill pumps at the Tailings Filtration Plant thickener. Goldcorp personnel indicated that by pumping in a closed circuit, the entire process (with the exception of the elution circuit and tailings filters) was treated.

Goldcorp monitored total cyanide concentrations as well as copper and iron concentrations by sampling every two (2) hours at the following four (4) locations:

- Discharge of Leach Tank 11
- Feed and discharge of Leach Tank 16
- Feed and discharge of Tank 51 at the Cyanide Destruction Circuit
- Discharge of Tank 53 at the Cyanide Destruction Circuit (and composite discharge of the same)

To corroborate results of these samples analyzed internally by Goldcorp, a sample was collected on February 10, 2015 at the Tailings Filtration Plant thickener and analyzed for weak-acid dissociable ("WAD") and total cyanide by a certified laboratory. The lab results show total and WAD cyanide concentrations of 0.959 mg/L and 0.103 mg/L, respectively.

Once neutralization of cyanide in the process equipment was accomplished, Goldcorp stopped adding cyanide destruction reagents (i.e., Caro's acid, sodium metabisulfite and copper sulfate) to the rinse solution. This reagent mixture is acidic; therefore, it was then necessary to increase the pH of the residual rinse solution via lime addition. Lime slurry was added to the Cyanide Destruction Circuit just as the reagents were during the detoxification process. Solution with the lime addition was circulated until a pH of 8.5 was achieved throughout the entire process circuit.

Following numerous rinse cycles conducted to decontaminate and neutralize the process circuits as described above, Goldcorp proceeded to analyze the quality of the residual rinse solution now stored in the Mill thickener, six (6) leach tanks and the Tailings Filtration Plant thickener, and totaling approximately 14,000 cubic meters (3.7 million gallons). Other tanks, equipment and piping within the process circuits were relatively empty.

To determine the quality of the rinse solution, samples were taken on June 1, 2015 at the following three (3) locations:

- Mill thickener
- Leach Tank 14
- Tailings Filtration Plant thickener

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Three samples collected at different depths were taken at each location. At the Mill thickener, samples were collected at depths of one (1), three (3), and six (6) meters. At Leach Tank 14, samples were collected at depths of one (1), six (6), and 12 meters. At the Tailings Filtration Plant thickener, samples were collected at depths of one (1), 2.5 and 5 meters. The three samples collected at each location were then mixed to create one composite sample for each location.

It is worth noting that before the samples were collected, Goldcorp activated the aeration and agitation systems at the at the leach tanks, Mill thickener and Tailings Filtration Plant thickener (i.e., the sampling locations) for a period of six hours in order improve the consistency of the residual rinse solution.

A laboratory accredited and approved by CONAGUA, performed the sampling and analyses. Goldcorp provided the analytical results for cyanide concentrations in the rinse solution, which are summarized below.

- Mill thickener: 0.03 mg/L total cyanide
- Leach Tank 14 (TK-014): 0.14 mg/L total cyanide
- Tailings Filtration Plant thickener: 0.22 mg/L total cyanide

Goldcorp also provided analytical results for a sample taken at the Tailings Filtration Plant thickener on May 14, 2015. The laboratory analysis reports a total cyanide concentration of 0.162 mg/L and a WAD cyanide concentration of 0.031 mg/L.

During normal operations, Goldcorp separated (screened) the carbon from process solution at the CIP tanks. The process solution was returned to the Mill thickener and the screened carbon was pumped with fresh water, at high pH levels, from the CIP circuit to the elution circuit at the ADR Plant. Goldcorp personnel indicated that the high pH levels served to minimize any residual cyanide left on the carbon from going into solution. Furthermore, Goldcorp did not use cyanide at the elution circuit to strip carbon. As a result, the carbon wash and strip facilities contained extremely low concentrations of cyanide during operations and were decommissioned by rinsing four times with fresh water and were not subject to the detoxification and neutralization rinse cycles using chemicals as were the remainder of the process circuits. Goldcorp did not analyze for cyanide in this circuit during operations and has no data regarding actual cyanide levels during normal operation or following decommissioning activities. Therefore, discussions with Goldcorp personnel and the Goldcorp memorandum documenting the four freshwater rinse cycles conducted at the ADR circuit (discussed above) provide the evidence needed to demonstrate that the carbon wash and strip facilities have been properly decommissioned.

Goldcorp did not consider the filters as a candidate for rinsing since the filtration circuit followed the Cyanide Destruction Circuit during normal operation. However, it is important to note, that in February 2014, Goldcorp conducted sampling of the residual sludge/sediments in the tanks and the encrustations on the tank walls at the Cyanide Destruction Circuit and Tailings Filtration Plant. On 4 February 2015, a composite sample was created using material collected from tanks 51 and 53 at the Cyanide Destruction Circuit and from the filters. *Corrosive-Reactive-Explosive-Toxic-Inflammable* (“CRETI”) testing is a regulatory norm performed to determine if an

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unknown material is hazardous (Method cited EPA-9014-1996 SW846 7.3 3.2-1994). Goldcorp provided the analytical results from the CRETI test performed on the composite sample indicating that reactive cyanide levels are less than 23.0 mg/kg wet base, and are therefore not reactive.

Cyanide Storage Warehouse

On 22 February 2015, Goldcorp took inventory of the empty and full containers (flobins) of sodium cyanide stored in the dedicated Cyanide Storage Warehouse. On 6 March 2015, Transportes Especializados Segutal S.A. de C.V. (“Segutal”) transported 54 flobins full of sodium cyanide and 20 empty flobins from the El Sauzal Mine to the Chemours (formerly DuPont) facility in Hermosillo in eight (8) separate trucks. The material shipped totaled approximately 74 tons of sodium cyanide.

Goldcorp reported the planned shipments and route to the Ministry of Communications and Transport, PROFEPA, Ministry of Economy and the State Mining Cluster Chihuahua by email two days before making the shipments. Goldcorp provided chain-of-custody documentation containing the serial number for each flobin (empty and full), the type of trucks used, and the names of the respective drivers. Chemours provided a letter (dated March 11, 2015) documenting that the 54 full flobins were received by March 7, 2015.

Emergency Pond

As of 24 July 2015, the Emergency Pond contained water. Goldcorp collected water quality samples at the pond in February and March of 2015 and analyzed the samples internally. Results showed WAD cyanide concentrations of zero in both samples and total cyanide concentrations of 0.20 mg/L in the February sample and 0.50 mg/L in the March sample.

The HDPE pipe connecting the process area with the pond was disconnected in June 2015. Therefore, the pond now only collects rainwater. Thus, during the field component of this ICMC *Applicability Determination for Closure Audit*, Goldcorp took an additional sample of the water contained in the Emergency Pond as confirmation that process solution was not discharged to the pond during the decommissioning activities occurring after the February and March samples were collected. The analytical results for the sample collected on July 23 show a WAD cyanide concentration of 0.08 mg/L.

DSTMA

In late 2014, Goldcorp began covering the surface of the DSTMA with waste rock to a depth of one (1) meter. As of 24 July 2015, only a small portion of the surface remained uncovered. The current schedule for completing placement of the cover material is September 2015, with the exception of a small “slot area” near the airstrip, which will be completed by May 2016. Sediments removed from the decommissioned process tanks will be placed in the slot area and then covered.

Based on the low concentration of cyanide contained in the residual rinse solution, confirmed by the sampling program conducted in June 2015, Goldcorp received regulatory approval from CONAGUA to discharge the 14,000 cubic meters (3.7 million gallons) of solution stored in the Mill thickener, leach tanks and the Tailings Filtration Plant thickener to the surface of the DSTMA for evaporation during the hot summer months. Thus, on 22 July 2015, Goldcorp discharged the water directly to the northwest corner of the DSTMA via an HDPE pipeline.

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On July 23, Goldcorp took a further confirmation sample of the water contained on the surface of the DSTMA and the analytical results for the sample show a WAD cyanide concentration of 0.08 mg/L. As of 24 July 2014, pools of water were still visible.

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0.6 Auditor Information

Audit Company: Visus Consulting Group, Inc.

Audit Team Leader: Mark A. Montoya, PE, CEA

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Audit Dates: July 22-25, 2015

I attest that I meet the criteria for knowledge, experience and conflict of interest for a Code Verification Audit Team Leader, established by the ICMI and that all members of the audit team meet the applicable criteria established by the ICMI for ICMC Verification Auditors. I further attest that this Summary Audit Report accurately describes the findings of the *Applicability Determination for Closure Audit* conducted for the El Sauzal Mine located in Chihuahua State, Mexico and that the verification audit was conducted in a professional manner in accordance with the ICMC Verification Protocol for Gold Mine Operations (dated October 2009) and using standard and accepted practices for health, safety and environmental audits.

FOR VISUS CONSULTING GROUP, INC.



Mark A. Montoya, PE, CEA
President / Principal
Lead Auditor and Gold Mining Technical Expert Auditor

0.7 Audit Findings

The operation is not subject to subject to the International Cyanide Management Code.

This *Applicability Determination for Closure Audit* was conducted following decommissioning of the El Sauzal cyanide facilities. Accordingly, the auditor determined that Goldcorp has successfully decommissioned the El Sauzal cyanide facilities in accordance with the ICMC definition for *Decommissioning* and that cyanide facilities and residual cyanide reagents no longer exist on site. Therefore, the El Sauzal operation is not subject to the ICMC.

This audit report documents the evidence supporting this finding for each ICMC Principle and Standard of Practice and demonstrates that the risks related to cyanide have been minimized to the point that all ICMC Principles and corresponding Standards of Practice provided in the ICMI Gold Mining Operations Verification Protocol no longer apply to the El Sauzal Mine. Because the El Sauzal Mine was recently recertified as being in full compliance with the Code, this final audit serves exclusively to verify that the El Sauzal Mine is no longer subject to the Code rather than to verify that the operation has or is meeting all of the Code Principles and Standards of Practice.

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0.8 Summary of ICMC Principles and Standards of Practice

For easy reference, **Table 1** below provides a summary of the ICMC Principles and associated Standards of Practice.

Table 1 Summary of ICMC Principles and Standards of Practice for Gold Mining Operations	
PRINCIPLE	STANDARDS OF PRACTICE
1. PRODUCTION: Encourage responsible cyanide manufacturing by purchasing from manufacturers who operate in a safe and environmentally protective manner.	1.1 Purchase cyanide from manufacturers employing appropriate practices and procedures to limit exposure of their workforce to cyanide and to prevent releases of cyanide to the environment.
2. TRANSPORTATION: Protect communities and the environment during cyanide transport.	2.1 Establish clear lines of responsibility for safety, security, release prevention, training and emergency response in written agreements with producers, distributors and transporters. 2.2 Require that cyanide transporters implement appropriate emergency response plans and capabilities, and employ adequate measures for cyanide management.
3. HANDLING AND STORAGE: Protect workers and the environment during cyanide handling and storage.	3.1 Design and construct unloading, storage and mixing facilities consistent with sound, accepted engineering practices and quality control and quality assurance procedures, spill prevention and spill containment measures. 3.2 Operate unloading, storage and mixing facilities using inspections, preventive maintenance and contingency plans to prevent or contain releases and control and respond to worker exposures.
4. OPERATIONS: Manage cyanide process solutions and waste streams to protect human health and the environment.	4.1 Implement management and operating systems designed to protect human health and the environment including contingency planning and inspection and preventive maintenance procedures. 4.2 Introduce management and operating systems to minimize cyanide use, thereby limiting concentrations of cyanide in mill tailings. 4.3 Implement a comprehensive water management program to protect against unintentional releases. 4.4 Implement measures to protect birds, other wildlife and livestock from adverse effects of cyanide process solutions. 4.5 Implement measures to protect fish and wildlife from direct and indirect discharges of cyanide process solutions to surface water. 4.6 Implement measures designed to manage seepage from cyanide facilities to protect the beneficial uses of ground water. 4.7 Provide spill prevention or containment measures for process tanks and pipelines. 4.8 Implement quality control/quality assurance procedures to confirm that cyanide facilities are constructed according to accepted engineering standards and specifications. 4.9 Implement monitoring programs to evaluate the effects of cyanide use on wildlife, surface and ground water quality.

Table 1 (continued) Summary of ICMC Principles and Standards of Practice for Gold Mining Operations	
PRINCIPLE	STANDARDS OF PRACTICE
5. DECOMMISSIONING: Protect communities and the environment from cyanide through development and implementation of decommissioning plans for cyanide facilities.	5.1 Plan and implement procedures for effective decommissioning of cyanide facilities to protect human health, wildlife and livestock. 5.2 Establish an assurance mechanism capable of fully funding cyanide-related decommissioning activities.
6. WORKER SAFETY: Protect workers' health and safety from exposure to cyanide.	6.1 Identify potential cyanide exposure scenarios and take measures as necessary to eliminate, reduce and control them. 6.2 Operate and monitor cyanide facilities to protect worker health and safety and periodically evaluate the effectiveness of health and safety measures. 6.3 Develop and implement emergency response plans and procedures to respond to worker exposure to cyanide.
7. EMERGENCY RESPONSE: Protect communities and the environment through the development of emergency response strategies and capabilities.	7.1 Prepare detailed emergency response plans for potential cyanide releases. 7.2 Involve site personnel and stakeholders in the planning process. 7.3 Designate appropriate personnel and commit necessary equipment and resources for emergency response. 7.4 Develop procedures for internal and external emergency notification and reporting. 7.5 Incorporate into response plans monitoring elements and remediation measures that account for the additional hazards of using cyanide treatment chemicals. 7.6 Periodically evaluate response procedures and capabilities and revise them as needed.
8. TRAINING: Train workers and emergency response personnel to manage cyanide in a safe and environmentally protective manner.	8.1 Train workers to understand the hazards associated with cyanide use. 8.2 Train appropriate personnel to operate the facility according to systems and procedures that protect human health, the community and the environment. 8.3 Train appropriate workers and personnel to respond to worker exposures and environmental releases of cyanide.
9. DIALOGUE: Engage in public consultation and disclosure.	9.1 Provide stakeholders the opportunity to communicate issues of concern. 9.2 Initiate dialogue describing cyanide management procedures and responsively address identified concerns. 9.3 Make appropriate operational and environmental information regarding cyanide available to stakeholders.

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1.0 PRODUCTION

Encourage responsible cyanide manufacturing by purchasing from manufacturers who operate in a safe and environmentally protective manner.

Standard of Practice 1.1

Purchase cyanide from manufacturers employing appropriate practices and procedures to limit exposure of their workforce to cyanide and to prevent releases of cyanide to the environment.

The operation is	<input checked="" type="checkbox"/> not subject to <input type="checkbox"/> subject to	Standard of Practice 1.1.
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Discussion of the basis for this Finding and any Identified Deficiencies:

This ICMC Standard of Practice is not applicable to the El Sauzal Mine as the operation no longer purchases cyanide for use in the recovery of gold and no longer stores cyanide on site.

On 6 March 2015, Transportes Especializados Segutal S.A. de C.V. (“Segutal”) transported 54 flobins full of sodium cyanide and 20 empty flobins from the El Sauzal Mine to the Chemours (formerly DuPont) facility in Hermosillo in eight (8) separate trucks. The material shipped totaled approximately 74 tons of sodium cyanide.

Goldcorp reported the planned shipments and route to the Ministry of Communications and Transport, PROFEPA, Ministry of Economy, and the State Mining Cluster Chihuahua by email two days before making the shipments and provided chain-of-custody documentation containing the serial number for each flobin (empty and full), the type of trucks used, and the names of the respective drivers. Chemours provided written documentation that the 54 full flobins were received by March 7, 2015.

During the field component of this ICMC *Applicability Determination for Closure Audit*, the auditor inspected the Cyanide Storage Warehouse and verified that it was completely empty. Additionally, Goldcorp personnel indicated that no flobins (empty or full) exist on site.

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2.0 TRANSPORTATION

Protect communities and the environment during cyanide transport.

Standard of Practice 2.1

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

The operation is <input checked="" type="checkbox"/> not subject to <input type="checkbox"/> subject to Standard of Practice 2.1.

Discussion of the basis for this Finding and any Identified Deficiencies:

This ICMC Standard of Practice is not applicable to the El Sauzal Mine as the operation no longer uses cyanide at the site for the recovery of gold and cyanide is no longer transported to the site.

As discussed under ICMC Standard of Practice 1.1 above, on 6 March 2015, Segutal transported 54 flobins full of sodium cyanide and 20 empty flobins from the El Sauzal Mine to the Chemours facility in Hermosillo via eight separate trucks. The material shipped totaled 74 tons of sodium cyanide.

Goldcorp reported the planned shipments and route to the Ministry of Communications and Transport, PROFEPA, Ministry of Economy, and the State Mining Cluster Chihuahua by email two days before making the shipments and provided chain-of-custody documentation containing the serial number for each flobin (empty and full), the type of trucks used, and the names of the respective drivers. Chemours provided written documentation that the 54 full flobins were received by March 7, 2015.

During the field component of this ICMC *Applicability Determination for Closure Audit*, the auditor inspected the Cyanide Storage Warehouse and verified that it was completely empty. Additionally, Goldcorp personnel indicated that no flobins (empty or full) exist on site.

Standard of Practice 2.2

Require that cyanide transporters implement appropriate emergency response plans and capabilities, and employ adequate measures for cyanide management.

The operation is <input checked="" type="checkbox"/> not subject to <input type="checkbox"/> subject to Standard of Practice 2.2.

Discussion of the basis for this Finding and any Identified Deficiencies:

This ICMC Standard of Practice is not applicable to the El Sauzal Mine as the operation no longer uses cyanide at the site for the recovery of gold and cyanide is no longer transported to the site (see ICMC Standard of Practice 2.1 above).

On 6 March 2015, Segutal transported the full and empty flobins remaining on site at the cessation of operations to the Chemours facility in Hermosillo. Segutal is part of Chemours' Mexico Supply Chain, which was recertified in full compliance with the Code on March 13, 2014.

Goldcorp provided chain-of-custody documentation containing the serial number for each flobin (empty and full), the type of trucks used, and the names of the respective drivers.

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3.0 HANDLING AND STORAGE

Protect workers and the environment during cyanide handling and storage.

Standard of Practice 3.1

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

The operation is <input checked="" type="checkbox"/> not subject to <input type="checkbox"/> subject to	Standard of Practice 3.1.
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Discussion of the basis for this Finding and any Identified Deficiencies:

This ICMC Standard of Practice is not applicable to the El Sauzal Mine as the operation no longer uses cyanide at the site for the recovery of gold and cyanide is no longer stored or mixed on site. The facilities previously used for the unloading, storage and mixing of cyanide have been decommissioned. See also, ICMC Standard of Practice 2.2 above.

In late December 2014, Goldcorp emptied the Sodium Cyanide Mixing Tank and the Sodium Cyanide Storage Tank and began neutralizing, decontaminating and washing the two tanks using caustic soda and sodium hypochlorite. Goldcorp followed its written procedure, "Decontamination of Closed Tanks" and the June 2015 Decontamination Report includes the detailed steps implemented.

During emptying, the tanks were drained to the concrete containment sump and the solution was pumped to the Mill thickener. After rinsing repeatedly for six (6) cycles, using the tank agitators to thoroughly mix the neutralizing solution, the residual rinse solution was pumped to the leach tanks and combined with the residual rinse solution from the other process circuits.

On 22 February 2015, Goldcorp completed rinsing both tanks and the sumps and concrete containment areas, thus ending decommissioning activities for the Cyanide Preparation Area.

During the field component of this ICMC *Applicability Determination for Closure Audit*, the auditor inspected the Cyanide Storage Warehouse and the Cyanide Preparation Area. The auditor verified that the warehouse was completely empty and free of residual sodium cyanide. The Process Plant Superintendent indicated that following removal of all flobins off site, the concrete floor inside the warehouse was thoroughly washed. The auditor also visually verified that the facilities previously utilized for the mixing and storage of sodium cyanide at the Cyanide Preparation Area, including tanks, feed hoppers, pumps, valves, pipes, concrete containments and appurtenances were empty and free of residual cyanide particles and encrustations.

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Standard of Practice 3.2

Operate unloading, storage and mixing facilities using inspections, preventive maintenance and contingency plans to prevent or contain releases and control and respond to worker exposures.

The operation is	<input checked="" type="checkbox"/> not subject to <input type="checkbox"/> subject to	Standard of Practice 3.2.
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Discussion of the basis for this Finding and any Identified Deficiencies:

This ICMC Standard of Practice is not applicable to the El Sauzal Mine as the operation no longer uses cyanide at the site for the recovery of gold and cyanide is no longer stored or mixed on site. The facilities previously used for the unloading, storage and mixing of cyanide have been decommissioned (see ICMC Standard of Practice 3.1 above) and on 6 March 2015, Segugal transported the full and empty flobins remaining on site at the cessation of operations to the Chemours facility in Hermosillo (see ICMC Standard of Practice 1.1 above).

During the field component of this ICMC *Applicability Determination for Closure Audit*, the auditor inspected the Cyanide Storage Warehouse and the Cyanide Preparation Area. The auditor verified that the warehouse was completely empty and free of residual sodium cyanide. Additionally, Goldcorp personnel indicated that no flobins (empty or full) exist on site. The Process Plant Superintendent indicated that following removal of all flobins off site, the concrete floor inside the warehouse was thoroughly washed.



4.0 OPERATIONS

Manage cyanide process solutions and waste streams to protect human health and the environment.

Standard of Practice 4.1

Implement management and operating systems designed to protect human health and the environment including contingency planning and inspection and preventive maintenance procedures.

The operation is <input checked="" type="checkbox"/> not subject to <input type="checkbox"/> subject to Standard of Practice 4.1.

Discussion of the basis for this Finding and any Identified Deficiencies:

This ICMC Standard of Practice is not applicable to the El Sauzal Mine as the operation no longer uses cyanide at the site for the recovery of gold and cyanide is no longer stored or mixed on site. The process facilities previously used for the unloading, storage and mixing of cyanide and for the recovery of gold (i.e., the El Sauzal cyanide facilities) have been decommissioned and are no longer operating. As summarized in **Section 0.4** of this audit report, the cyanide facilities that were active prior to decommissioning included the following:

- Cyanide Storage Warehouse
- Cyanide Preparation Area
- Milling Circuit
- Leaching Circuit
- CIP Circuit
- ADR Plant
- Cyanide Destruction Circuit
- Tailings Filtration Plant
- Dry Stack Tailings Management Area (DSTMA)
- Emergency Pond
- Stormwater Diversions; and
- Associated concrete and lined secondary containment structures, sumps, process solution transfer pipes, valves, and pumps.

Please refer to **Section 0.5.3** of this audit report for a description of the activities that Goldcorp completed to decommission the El Sauzal cyanide facilities. As verification that the cyanide facilities have been fully decommissioned, Goldcorp provided analytical results demonstrating that WAD cyanide concentrations of residual rinse solutions within the process circuits and the Emergency Pond were below 0.5 mg/L following the

detrificalion and neutralization rinse cycles. Following confirmation testing and regulatory approval, Goldcorp released the residual rinse water, via a surface pipeline, to the surface of the DSTMA for evaporation.

Additionally, Goldcorp conducted sampling of the residual sludge/sediments in the tanks and the encrustations on the tank walls at the Cyanide Destruction Circuit and Tailings Filtration Plant. Goldcorp provided the analytical results from the testing, which indicated that cyanide levels in the residual solids are not reactive.

During the field component of this ICMC *Applicability Determination for Closure Audit*, the auditor inspected the above-listed facilities. The auditor verified that the Cyanide Storage Warehouse was completely empty and free of residual sodium cyanide. Additionally, the auditor visually verified that the above-listed process areas and circuits, including tanks, feed hoppers, pumps, valves, pipes, concrete containments and appurtenances were empty of solution and free of residual cyanide particles and encrustations.

The only open or stored water observed on site during the field component of this audit, was rain water within the two process water feed tanks, the residual rinse water on the surface of the DSTMA and water stored in the Emergency Pond. Goldcorp released the residual rinse water to the DSTMA the same day that the auditor performed the site inspection and anticipates that the water will evaporate during the hot summer months. Additionally, Goldcorp will allow the residual water in the Emergency Pond to evaporate (see **Section 0.5.2** above).

On July 23, Goldcorp took further confirmation samples of the water contained in the Emergency Pond and on the surface of the DSTMA. The analytical results for both samples show a WAD cyanide concentration of 0.08 mg/L.

Although the El Sauzal cyanide facilities have been decommissioned and are no longer operating, the mine continues to employ five (5) diesel-powered generators to supply power during interruptions to the primary power source, the Comisión Federal de Electricidad line transmission grid. According to the ICMC Detailed Audit Report prepared for the 2014 ICMC recertification audit, only four of the generators were needed to power the entire mine during operations. During the field component of this ICMC *Applicability Determination for Closure Audit*, the generators were running for a period due to a temporary line power outage.

Standard of Practice 4.2

Introduce management and operating systems to minimize cyanide use, thereby limiting concentrations of cyanide in mill tailings.

<p>The operation is <input checked="" type="checkbox"/> not subject to Standard of Practice 4.2. <input type="checkbox"/> subject to</p>

Discussion of the basis for this Finding and any Identified Deficiencies:

This ICMC Standard of Practice is not applicable to the El Sauzal Mine as the operation no longer uses cyanide at the site for the recovery of gold and cyanide is no longer stored or mixed on site. The process facilities previously

used for the unloading, storage and mixing of cyanide and for the recovery of gold (i.e., the El Sauzal cyanide facilities) have been decommissioned and are no longer operating (see ICMC Standard of Practice 4.1 above).

Standard of Practice 4.3

Implement a comprehensive water management program to protect against unintentional releases.

<p>The operation is</p> <p><input checked="" type="checkbox"/> not subject to</p> <p><input type="checkbox"/> subject to</p>	<p>Standard of Practice 4.3.</p>
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Discussion of the basis for this Finding and any Identified Deficiencies:

This ICMC Standard of Practice is not applicable to the El Sauzal Mine as the operation no longer uses cyanide at the site for the recovery of gold and cyanide is no longer stored or mixed on site. The process facilities previously used for the unloading, storage and mixing of cyanide and for the recovery of gold (i.e., the El Sauzal cyanide facilities) have been decommissioned and are no longer operating (see ICMC Standard of Practice 4.1 above).

The only open or stored water observed on site during the field component of this audit, was rain water within the two process water feed tanks, the residual rinse water on the surface of the DSTMA and water stored in the Emergency Pond. Goldcorp released the residual rinse water to the DSTMA the same day that the auditor performed the site inspection and anticipates that the water will evaporate during the hot summer months. Additionally, Goldcorp will allow the residual water in the Emergency Pond to evaporate.

As part of the mine closure plan, Goldcorp will construct a new surface water diversion system to route upgradient runoff around the reclaimed mine and process areas. The current schedule for constructing the diversion channels is the second quarter of 2016. Ultimately, Goldcorp plans to complete construction of all diversion channels before the start of the next rainy season (June 2016). Nonetheless, the stormwater management system that was in place during operations continues to function. These existing controls serve to route upgradient runoff around the process areas, including the DSTMA.

The current design and construction of the DSTMA includes a rock-fill berm with compacted tailings placed as structural fill at the downgradient side of the DSTMA to provide containment, and a rock-fill diversion dam with compacted tailings at the upgradient side of the DSTMA to divert the upper catchment area. A concrete-encased riser pipe (bypass outlet) in the main drainage, routes run-off from the upper catchment area through the bottom of the DSTMA to the downstream toe of facility for release to a downgradient sediment pond. Additionally, a rock-fill underdrain system collects seepage and surface run-off from the base of the DSTMA and routes it to the sediment pond.

A consulting firm developed a stormwater management plan for Goldcorp, which fits into the overall closure planning process and provided a technical memorandum summarizing key components of the closure stormwater

design. The 100-year, 24-hour storm event was used to size all diversion channels and the Probable Maximum Precipitation (“PMP”) event was used to evaluate spillway sizing.

The management plan includes designs for the new diversion channels, stilling basins, detention ponds, and spillways, which will capture and collect stormwater from natural drainages upstream of the mine site and convey these flows around mine facilities. This water will exit the mine site downgradient of the mine infrastructure and discharge into existing natural drainages that flow to the Urique River. The closure stormwater management plan also evaluated the storage capacity of the detention pond formed by the rock-fill containment berm at the upgradient side of the DSTMA and the capacity of the sediment pond located downgradient of the DSTMA to ensure that these structures have sufficient capacity to route runoff from extreme rainfall events. It was determined that these structures will be capable of containing all of the runoff from the 100-year event and during the PMP event, the surface of the DSTMA will drain towards a proposed diversion channel. Removing water from the surface of the DSTMA during an extreme event will help ensure that water will not overtop the downgradient rock-fill dam.

To decrease the overall site hazard potential, the water management plan includes reducing the existing 22-meter high sediment pond embankment located downgradient of the DSTMA to a 5-meter high rock structure with gentle sideslopes. This structure will continue to provide sediment control but will allow extreme flood events to pass without concern for dam failure.

Standard of Practice 4.4

Implement measures to protect birds, other wildlife and livestock from adverse effects of cyanide process solutions.

<p>The operation is</p> <p><input checked="" type="checkbox"/> not subject to</p> <p><input type="checkbox"/> subject to</p>	<p>Standard of Practice 4.4.</p>
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Discussion of the basis for this Finding and any Identified Deficiencies:

This ICMC Standard of Practice is not applicable to the El Sauzal Mine as the operation no longer uses cyanide at the site for the recovery of gold and cyanide is no longer stored or mixed on site. The process facilities previously used for the unloading, storage and mixing of cyanide and for the recovery of gold (i.e., the El Sauzal cyanide facilities) have been decommissioned and are no longer operating (see ICMC Standard of Practice 4.1 above).

The only open water observed on site during the field component of this ICMC *Applicability Determination for Closure Audit*, was rain water within the two process water feed tanks, the residual rinse water on the surface of the DSTMA and water stored in the Emergency Pond. Goldcorp released the residual rinse water to the DSTMA the same day that the auditor performed the site inspection and anticipates that the water will evaporate during the hot summer months. Additionally, Goldcorp will allow the residual water in the Emergency Pond to evaporate.

Regardless, the WAD cyanide concentrations in the open waters contained in the Emergency Pond and on the surface of the DSTMA are below 50 mg/L. As verification, on 23 July 2015, Goldcorp took further confirmation samples of the water contained in the Emergency Pond and on the surface of the DSTMA. The analytical results for both samples show a WAD cyanide concentration of 0.08 mg/L.

The El Sauzal Mine did not employ heap leach facilities during operations. Leaching operations were conducted in six (6) leach tanks located at the processing plant.

Standard of Practice 4.5

Implement measures to protect fish and wildlife from direct and indirect discharges of cyanide process solutions to surface water.

<p>The operation is</p> <p><input checked="" type="checkbox"/> not subject to</p> <p><input type="checkbox"/> subject to</p>	<p>Standard of Practice 4.5.</p>
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Discussion of the basis for this Finding and any Identified Deficiencies:

This ICMC Standard of Practice is not applicable to the El Sauzal Mine as the cyanide facilities have been decommissioned and, as discussed below, Goldcorp has demonstrated that indirect seepage from the DSTMA does present a risk to the environment (aquatic life) due to its cyanide content. See also, ICMC Standard of Practice 4.1 above. Goldcorp operated the mine and is closing the mine as a “zero discharge facility”.

The DSTMA resides in a natural drainage, called Guamuchilar Creek, located immediately south and downgradient of the process plant facilities. The watercourse flows south to the Urique River. During the field component of this ICMC *Applicability Determination for Closure Audit*, the drainage was flowing from the outfall of the DSTMA underdrain system at downgradient toe of the facility to the sediment pond located approximately two (2) km south. At the sediment pond, flow infiltrates and continues as subsurface flow, south to the Urique River.

There are several small pools of water along the stream, created by sediment catchment berms, which sustain cattails and what appear to be other wetland plants. Goldcorp personnel indicated that the stream is perennial and contains aquatic life (i.e., frogs), and that there is not an established mixing zone between the toe of the tailings dam and a compliance point along the stream. Guamuchilar Spring, a natural spring located within the footprint of the DSTMA, is the primary water source feeding the stream. Water from the spring mixes with seepage from the DSTMA.

Goldcorp monitors surface water quality for cyanide at four (4) locations, including immediately downgradient of the DSTMA at the underdrain discharge, at the sediment pond located approximately 2 km downgradient of the DSTMA, in the Urique River upstream of the process facilities, and in the Urique River downstream of the process facilities. The auditor reviewed water quality data for the samples collected at these monitoring points over the past two years. The data verify that WAD cyanide concentrations from samples collected at the downgradient

monitoring points over this period are below 0.022 mg/L, with the exception of one sample collected immediately downgradient of the DSTMA on 5 January 2015, which had a WAD cyanide concentration of 0.036 mg/L. The Auditor determined that the elevated concentration in the sample collected on 5 January 2015 was an anomalous event and is not representative of the water quality over the entire two-year period. As final confirmation, Goldcorp collected a sample at this monitoring point on 23 July 2013 and the analytical results show a WAD cyanide concentration of 0.02 mg/L.

The free cyanide component in a sample cannot be greater than the WAD cyanide component; therefore, the water quality data demonstrate that cyanide concentrations in surface water immediately downgradient of the tailings facility do not exceed the ICMC surface water quality standard for cyanide (0.022 mg/L free). Furthermore, the data demonstrate that indirect seepage from the tailings has not presented a risk to the environment (aquatic life) due to its cyanide content over the past two years, during active operations.

For that reason, in the Auditor’s professional judgment, additional measures in this case, such as completing placement of the cover material on the surface of the DSTMA or construction of the new surface water diversion channels upgradient of the tailings, are not required to further protect surface water quality and decommission the tailings facility under ICMC standards. Nonetheless, Goldcorp will complete implementation of these measures by the second quarter of 2016 according to its current mine closure program.

Standard of Practice 4.6

Implement measures designed to manage seepage from cyanide facilities to protect the beneficial uses of ground water.

<p>The operation is</p> <p><input checked="" type="checkbox"/> not subject to</p> <p><input type="checkbox"/> subject to</p>	<p>Standard of Practice 4.6.</p>
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Discussion of the basis for this Finding and any Identified Deficiencies:

This ICMC Standard of Practice is not applicable to the El Sauzal Mine as the operation no longer uses cyanide at the site for the recovery of gold and cyanide is no longer stored or mixed on site. The process facilities previously used for the unloading, storage and mixing of cyanide and for the recovery of gold (i.e., the El Sauzal cyanide facilities) have been decommissioned and are no longer operating (see ICMC Standard of Practice 4.1 above). Furthermore, Goldcorp has demonstrated that seepage from the facilities during operation and following decommissioning does not present a risk to groundwater quality due to its cyanide content (see below).

As documented in the ICMC Detailed Audit Report prepared for the 2014 ICMC recertification audit, the mine site is located on a mountainside with thin soils underlain by bedrock, and as such does not have an aquifer with beneficial uses of groundwater beneath the mine or even immediately downgradient of the mine. The shallow alluvium of the Urique River, located approximately 2 km downgradient from the mine, constitutes an aquifer, but

the source of the groundwater is likely the surface water-groundwater connection along the river. The El Sauzal Mine does not have underground workings; and therefore, Goldcorp did not use mill tailings as underground backfill during operations.

The El Sauzal Mine does not have points of compliance or groundwater monitoring wells along the river and Mexico does not have a numerical standard for cyanide in groundwater. In accordance with NOM-001-SEMARNAT-1996, for the designated beneficial use of agriculture, the numerical standards for discharge to surface water and soil are 1.0 mg/L and 2.0 mg/L total cyanide, respectively.

During operations, Goldcorp collected quarterly samples from its two active groundwater extraction wells located approximately 2 km downgradient from the mine in the alluvium along the Urique River (a third well exists but is was not used or sampled). As documented in the ICMC Detailed Audit Report prepared for the 2014 ICMC recertification audit, Goldcorp provided a time series graph of quarterly results for the two active wells showing that the concentrations of WAD and total cyanide were non-detect (less than 0.01 mg/L) throughout the three-year ICMC recertification period. Goldcorp no longer monitors the wells routinely now that the mine is not operating. The latest samples were collected in January and November of 2013 and the analytical results show WAD cyanide levels below the detection limit (less than 0.01 mg/L).

Standard of Practice 4.7

Provide spill prevention or containment measures for process tanks and pipelines.

The operation is	<input checked="" type="checkbox"/> not subject to	Standard of Practice 4.7.
	<input type="checkbox"/> subject to	

Discussion of the basis for this Finding and any Identified Deficiencies:

This ICMC Standard of Practice is not applicable to the El Sauzal Mine as the operation no longer uses cyanide at the site for the recovery of gold and cyanide is no longer stored or mixed on site. The process facilities previously used for the unloading, storage and mixing of cyanide and for the recovery of gold (i.e., the El Sauzal cyanide facilities) have been decommissioned and are no longer operating (see ICMC Standard of Practice 4.1 above).



Standard of Practice 4.8

Implement quality control/quality assurance procedures to confirm that cyanide facilities are constructed according to accepted engineering standards and specifications.

The operation is	<input checked="" type="checkbox"/> not subject to <input type="checkbox"/> subject to	Standard of Practice 4.8.
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Discussion of the basis for this Finding and any Identified Deficiencies:

This ICMC Standard of Practice is not applicable to the El Sauzal Mine as the operation no longer uses cyanide at the site for the recovery of gold and cyanide is no longer stored or mixed on site. The process facilities previously used for the unloading, storage and mixing of cyanide and for the recovery of gold (i.e., the El Sauzal cyanide facilities) have been decommissioned and are no longer operating (see ICMC Standard of Practice 4.1 above). Furthermore, Goldcorp has not constructed any new cyanide facilities or modified any existing cyanide facilities subsequent to the 2014 ICMC recertification audit.

Standard of Practice 4.9

Implement monitoring programs to evaluate the effects of cyanide use on wildlife, surface and ground water quality.

The operation is	<input checked="" type="checkbox"/> not subject to <input type="checkbox"/> subject to	Standard of Practice 4.9.
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Discussion of the basis for this Finding and any Identified Deficiencies:

This ICMC Standard of Practice is not applicable to the El Sauzal Mine as the operation no longer uses cyanide at the site for the recovery of gold and cyanide is no longer stored or mixed on site. The process facilities previously used for the unloading, storage and mixing of cyanide and for the recovery of gold (i.e., the El Sauzal cyanide facilities) have been decommissioned and are no longer operating (see ICMC Standard of Practice 4.1 above).

Goldcorp operated and is closing the El Sauzal Mine as a “zero discharge facility” and has demonstrated that indirect seepage from the facilities during operation and following decommissioning does not present a risk to the environment (water quality and wildlife) due to its cyanide content (see ICMC Standards of Practice 4.4, 4.5 and 4.6 above). Therefore, the written procedures developed by Goldcorp for monitoring activities, as documented in the ICMC Detailed Audit Report prepared for the 2014 ICMC recertification audit, no longer apply for purposes of the Code.

5.0 DECOMMISSIONING

Protect communities and the environment from cyanide through development and implementation of decommissioning plans for cyanide facilities.

Standard of Practice 5.1

Plan and implement procedures for effective decommissioning of cyanide facilities to protect human health, wildlife and livestock.

The operation is <input checked="" type="checkbox"/> not subject to <input type="checkbox"/> subject to Standard of Practice 5.1.

Discussion of the basis for this Finding and any Identified Deficiencies:

This ICMC Standard of Practice is not applicable to the El Sauzal Mine as the operation no longer uses cyanide at the site for the recovery of gold and cyanide is no longer stored or mixed on site. The process facilities previously used for the unloading, storage and mixing of cyanide and for the recovery of gold (i.e., the El Sauzal cyanide facilities) have been decommissioned and are no longer operating (see ICMC Standard of Practice 4.1 above).

The *El Sauzal Closure Plan* (dated May 2011) presents the general closure activities proposed for the entire site and describes measures to close fully the mine facilities, process facilities and site infrastructure. Relevant to the ICMC, Section 6.0 of the Closure Plan presents the general closure activities for all process facilities, which encompass the El Sauzal cyanide facilities. More specifically, the process facilities covered by the Closure Plan include the DSTMA, Emergency Pond, cyanide and chemical storage, assay lab, refinery, and process circuits including equipment, tanks, mills, filtration components, steel sumps, piping, pumps, process buildings and interior fixtures, and concrete foundations. Please refer to **Section 0.5.2** of this audit report for a summary of the measures presented in the Closure Plan for closure of the process facilities.

Near completion of decommissioning the El Sauzal process facilities, Goldcorp prepared the *Process Plant Decontamination Report* (dated June 2015), which describes the actual decommissioning activities that Goldcorp conducted to treat, neutralize or otherwise manage cyanide and cyanide containing process solutions remaining in storage and process facilities in preparation for closure. Goldcorp submitted the Decontamination Report to the Mexican federal regulatory agencies, which include SEMARNAT, CONAGUA and PROFEPA.

The Decontamination Report describes the decommissioning activities that Goldcorp had implemented as of June 2015. The only decommissioning activity remaining at that time was transfer of residual rinse solution from the process circuits to the surface of the DSTMA for evaporation, which was subsequently completed on July 22, 2015. Please refer to **Section 0.5.3** of this audit report and ICMC Standard of Practice 4.1 above for a summary of the

decommissioning activities completed by Goldcorp for the El Sauzal cyanide facilities as presented in the Decontamination Report.

Standard of Practice 5.2

Establish an assurance mechanism capable of fully funding cyanide related decommissioning activities.

The operation is	<input checked="" type="checkbox"/> not subject to <input type="checkbox"/> subject to	Standard of Practice 5.2.
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Discussion of the basis for this Finding and any Identified Deficiencies:

This ICMC Standard of Practice is not applicable to the El Sauzal Mine (see ICMC Standard of Practice 5.1 above). Nonetheless, as documented in the ICMC Detailed Audit Report prepared for the 2014 ICMC recertification audit, Goldcorp developed an estimate of the cost to fully fund third party implementation of the cyanide-related decommissioning measures as identified in its Closure Plan. As documented in the ICMC Detailed Audit Report prepared for the 2014 ICMC recertification audit, the Mexican jurisdiction did not require the El Sauzal Mine to establish a financial assurance mechanism to cover closure and reclamation costs; therefore, Goldcorp established self-guarantee as the financial assurance mechanism. During the 2014 ICMC recertification audit, Goldcorp provided documentation from a qualified accounting firm verifying Goldcorp’s financial compliance as a self-guarantee mechanism to cover the estimated costs for cyanide-related closure activities, which are now complete.



6.0 WORKER SAFETY

Protect workers' health and safety from exposure to cyanide.

Standard of Practice 6.1

Identify potential cyanide exposure scenarios and take measures as necessary to eliminate, reduce and control them.

The operation is <input checked="" type="checkbox"/> not subject to <input type="checkbox"/> subject to	Standard of Practice 6.1.
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Discussion of the basis for this Finding and any Identified Deficiencies:

This ICMC Standard of Practice is not applicable to the El Sauzal Mine as the operation no longer uses cyanide at the site for the recovery of gold and cyanide is no longer stored or mixed on site. The process facilities previously used for the unloading, storage and mixing of cyanide and for the recovery of gold (i.e., the El Sauzal cyanide facilities) have been decommissioned and are no longer operating (see ICMC Standard of Practice 4.1 above).

Therefore, the written procedures developed by Goldcorp for cyanide-related tasks, as documented in the ICMC Detailed Audit Report prepared for the 2014 ICMC recertification audit, no longer apply.

Standard of Practice 6.2

Operate and monitor cyanide facilities to protect worker health and safety and periodically evaluate the effectiveness of health and safety measures.

The operation is <input checked="" type="checkbox"/> not subject to <input type="checkbox"/> subject to	Standard of Practice 6.2.
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Discussion of the basis for this Finding and any Identified Deficiencies:

This ICMC Standard of Practice is not applicable to the El Sauzal Mine as the operation no longer uses cyanide at the site for the recovery of gold and cyanide is no longer stored or mixed on site. The process facilities previously used for the unloading, storage and mixing of cyanide and for the recovery of gold (i.e., the El Sauzal cyanide facilities) have been decommissioned and are no longer operating (see ICMC Standard of Practice 4.1 above).



Standard of Practice 6.3

Develop and implement emergency response plans and procedures to respond to worker exposure to cyanide.

The operation is	<input checked="" type="checkbox"/> not subject to	Standard of Practice 6.3.
	<input type="checkbox"/> subject to	

Discussion of the basis for this Finding and any Identified Deficiencies:

This ICMC Standard of Practice is not applicable to the El Sauzal Mine as the operation no longer uses cyanide at the site for the recovery of gold and cyanide is no longer stored or mixed on site. The process facilities previously used for the unloading, storage and mixing of cyanide and for the recovery of gold (i.e., the El Sauzal cyanide facilities) have been decommissioned and are no longer operating (see ICMC Standard of Practice 4.1 above).

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7.0 EMERGENCY RESPONSE

Protect communities and the environment through the development of emergency response strategies and capabilities.

Standard of Practice 7.1

Prepare detailed emergency response plans for potential cyanide releases.

The operation is	<input checked="" type="checkbox"/> not subject to <input type="checkbox"/> subject to	Standard of Practice 7.1.
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Discussion of the basis for this Finding and any Identified Deficiencies:

This ICMC Standard of Practice is not applicable to the El Sauzal Mine as the operation no longer uses cyanide at the site for the recovery of gold and cyanide is no longer stored or mixed on site. The process facilities previously used for the unloading, storage and mixing of cyanide and for the recovery of gold (i.e., the El Sauzal cyanide facilities) have been decommissioned and are no longer operating (see ICMC Standard of Practice 4.1 above).

Standard of Practice 7.2

Involve site personnel and stakeholders in the planning process.

The operation is	<input checked="" type="checkbox"/> not subject to <input type="checkbox"/> subject to	Standard of Practice 7.2.
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Discussion of the basis for this Finding and any Identified Deficiencies:

This ICMC Standard of Practice is not applicable to the El Sauzal Mine as the operation no longer uses cyanide at the site for the recovery of gold and cyanide is no longer stored or mixed on site. The process facilities previously used for the unloading, storage and mixing of cyanide and for the recovery of gold (i.e., the El Sauzal cyanide facilities) have been decommissioned and are no longer operating (see ICMC Standard of Practice 4.1 above).



Standard of Practice 7.3

Designate appropriate personnel and commit necessary equipment and resources for emergency response.

The operation is	<input checked="" type="checkbox"/> not subject to <input type="checkbox"/> subject to	Standard of Practice 7.3.
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Discussion of the basis for this Finding and any Identified Deficiencies:

This ICMC Standard of Practice is not applicable to the El Sauzal Mine as the operation no longer uses cyanide at the site for the recovery of gold and cyanide is no longer stored or mixed on site. The process facilities previously used for the unloading, storage and mixing of cyanide and for the recovery of gold (i.e., the El Sauzal cyanide facilities) have been decommissioned and are no longer operating (see ICMC Standard of Practice 4.1 above).

Standard of Practice 7.4

Develop procedures for internal and external emergency notification and reporting.

The operation is	<input checked="" type="checkbox"/> not subject to <input type="checkbox"/> subject to	Standard of Practice 7.4.
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Discussion of the basis for this Finding and any Identified Deficiencies:

This ICMC Standard of Practice is not applicable to the El Sauzal Mine as the operation no longer uses cyanide at the site for the recovery of gold and cyanide is no longer stored or mixed on site. The process facilities previously used for the unloading, storage and mixing of cyanide and for the recovery of gold (i.e., the El Sauzal cyanide facilities) have been decommissioned and are no longer operating (see ICMC Standard of Practice 4.1 above).

Standard of Practice 7.5

Incorporate into response plans and remediation measures monitoring elements that account for the additional hazards of using cyanide treatment chemicals.

The operation is	<input checked="" type="checkbox"/> not subject to <input type="checkbox"/> subject to	Standard of Practice 7.5.
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Discussion of the basis for this Finding and any Identified Deficiencies:

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This ICMC Standard of Practice is not applicable to the El Sauzal Mine as the operation no longer uses cyanide at the site for the recovery of gold and cyanide is no longer stored or mixed on site. The process facilities previously used for the unloading, storage and mixing of cyanide and for the recovery of gold (i.e., the El Sauzal cyanide facilities) have been decommissioned and are no longer operating (see ICMC Standard of Practice 4.1 above).

Standard of Practice 7.6

Periodically evaluate response procedures and capabilities and revise them as needed.

The operation is	<input checked="" type="checkbox"/> not subject to	Standard of Practice 7.6.
	<input type="checkbox"/> subject to	

Discussion of the basis for this Finding and any Identified Deficiencies:

This ICMC Standard of Practice is not applicable to the El Sauzal Mine as the operation no longer uses cyanide at the site for the recovery of gold and cyanide is no longer stored or mixed on site. The process facilities previously used for the unloading, storage and mixing of cyanide and for the recovery of gold (i.e., the El Sauzal cyanide facilities) have been decommissioned and are no longer operating (see ICMC Standard of Practice 4.1 above).

8.0 TRAINING

Train workers and emergency response personnel to manage cyanide in a safe and environmentally protective manner.

Standard of Practice 8.1

Train workers to understand the hazards associated with cyanide use.

The operation is <input checked="" type="checkbox"/> not subject to <input type="checkbox"/> subject to	Standard of Practice 8.1.
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Discussion of the basis for this Finding and any Identified Deficiencies:

This ICMC Standard of Practice is not applicable to the El Sauzal Mine as the operation no longer uses cyanide at the site for the recovery of gold and cyanide is no longer stored or mixed on site. The process facilities previously used for the unloading, storage and mixing of cyanide and for the recovery of gold (i.e., the El Sauzal cyanide facilities) have been decommissioned and are no longer operating (see ICMC Standard of Practice 4.1 above).

Standard of Practice 8.2

Train appropriate personnel to operate the facility according to systems and procedures that protect human health, the community and the environment.

The operation is <input checked="" type="checkbox"/> not subject to <input type="checkbox"/> subject to	Standard of Practice 8.2.
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Discussion of the basis for this Finding and any Identified Deficiencies:

This ICMC Standard of Practice is not applicable to the El Sauzal Mine as the operation no longer uses cyanide at the site for the recovery of gold and cyanide is no longer stored or mixed on site. The process facilities previously used for the unloading, storage and mixing of cyanide and for the recovery of gold (i.e., the El Sauzal cyanide facilities) have been decommissioned and are no longer operating (see ICMC Standard of Practice 4.1 above).



Standard of Practice 8.3

Train appropriate workers and personnel to respond to worker exposures and environmental releases of cyanide.

The operation is	<input checked="" type="checkbox"/> not subject to	Standard of Practice 8.3.
	<input type="checkbox"/> subject to	

Discussion of the basis for this Finding and any Identified Deficiencies:

This ICMC Standard of Practice is not applicable to the El Sauzal Mine as the operation no longer uses cyanide at the site for the recovery of gold and cyanide is no longer stored or mixed on site. The process facilities previously used for the unloading, storage and mixing of cyanide and for the recovery of gold (i.e., the El Sauzal cyanide facilities) have been decommissioned and are no longer operating (see ICMC Standard of Practice 4.1 above).



9.0 DIALOGUE

Engage in public consultation and disclosure.

Standard of Practice 9.1

Provide stakeholders the opportunity to communicate issues of concern.

The operation is	<input checked="" type="checkbox"/> not subject to <input type="checkbox"/> subject to	Standard of Practice 9.1.
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Discussion of the basis for this Finding and any Identified Deficiencies:

This ICMC Standard of Practice is not applicable to the El Sauzal Mine as the operation no longer uses cyanide at the site for the recovery of gold and cyanide is no longer stored or mixed on site. The process facilities previously used for the unloading, storage and mixing of cyanide and for the recovery of gold (i.e., the El Sauzal cyanide facilities) have been decommissioned and are no longer operating (see ICMC Standard of Practice 4.1 above).

Standard of Practice 9.2

Initiate dialogue describing cyanide management procedures and responsively address identified concerns.

The operation is	<input checked="" type="checkbox"/> not subject to <input type="checkbox"/> subject to	Standard of Practice 9.2.
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Discussion of the basis for this Finding and any Identified Deficiencies:

This ICMC Standard of Practice is not applicable to the El Sauzal Mine as the operation no longer uses cyanide at the site for the recovery of gold and cyanide is no longer stored or mixed on site. The process facilities previously used for the unloading, storage and mixing of cyanide and for the recovery of gold (i.e., the El Sauzal cyanide facilities) have been decommissioned and are no longer operating (see ICMC Standard of Practice 4.1 above).



Standard of Practice 9.3

Make appropriate operational and environmental information regarding cyanide available to stakeholders.

The operation is	<input checked="" type="checkbox"/> not subject to	Standard of Practice 9.3.
	<input type="checkbox"/> subject to	

Discussion of the basis for this Finding and any Identified Deficiencies:

This ICMC Standard of Practice is not applicable to the El Sauzal Mine as the operation no longer uses cyanide at the site for the recovery of gold and cyanide is no longer stored or mixed on site. The process facilities previously used for the unloading, storage and mixing of cyanide and for the recovery of gold (i.e., the El Sauzal cyanide facilities) have been decommissioned and are no longer operating (see ICMC Standard of Practice 4.1 above).

10.0 REFERENCES

Golder Associates Inc., 2014. "ICMC Recertification Detailed Audit Report, El Sauzal Mine, Chihuahua, Mexico".
September (Draft)

WEBSITE REFERENCES

International Cyanide Management Code (ICMC). 2012. www.cyanidecode.org

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