INTERNATIONAL CYANIDE MANAGEMENT CODE

Trident Shipping
Transportation Certification Audit, Côte d’Ivoire,
Summary Audit Report

Submitted to:
International Cyanide Management Institute (ICMI)
1400 I Street, NW
Suite 550
Washington, DC 20005
UNITED STATES OF AMERICA

Trident Shipping
18 BP 2822 Abidjan 18
Côte d'Ivoire
ABIDJAN - CÔTE D’IVOIRE

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Distribution:
1 Copy (+1 Electronic) - International Cyanide Management Institute
1 Electronic Copy - Trident Shipping
1 Electronic Copy - Golder Associates Pty Ltd
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APPENDIX A

Important Information
1.0 INTRODUCTION

1.1 Operational Information

Name of Transportation Facility: Trident Shipping
Name of Facility Owner: Not Applicable
Name of Facility Operator: Trident Shipping
Name of Responsible Manager: Marcel Ouattara, Chef de Service Transport & Direction/Logistique Movis Côte d’Ivoire
Address: 18 BP 2822 Abidjan 18
State/Province: ABIDJAN
Country: CÔTE D’IVOIRE
Telephone: (Tel) +225 21 21 44 12 (Cell) +225 09 00 26 40
Fax: None
Email: Marcel.Ouattara@movis-ci.com

1.2 Trident Shipping
Trident Shipping has been transporting mining equipment and general and hazardous goods throughout Côte d’Ivoire for over 18 years.

Trident Shipping transports cyanide that is imported to Côte d’Ivoire through the Port of Abidjan. Trident Shipping currently transports cyanide between the Port of Abidjan and Randgold Resource’s Tongon Gold Mine in Côte d’Ivoire.

Trident Shipping transports solid sodium cyanide as a >95% pure white briquette. The cyanide briquettes are packaged in Intermediate Bulk Containers (IBCs) with a capacity of 1000 kg or 1200 kg. The briquettes are stored within a woven polypropylene bag, sealed with a polyethylene plastic liner, within a wooden crate. Consignments of stock are transported in standard shipping containers (sea containers) of up to a maximum of 24.2 tons.

1.3 Trans-shipping Depots or Interim Storage Sites
Within the scope of this audit, there are no trans-shipping depots or interim storage sites, as defined in the audit protocol.
1.4 Auditors Findings and Attestation

☑ in full compliance with

Trident Shipping is:
☐ in substantial compliance with Cyanide Management Code
☐ not in compliance with

Audit Company: Golder Associates Pty Ltd
Audit Team Leader: Ed Clerk, Exemplar Global (105995)
Email: eclerk@golder.com.au

1.5 Name and Signatures of Other Auditors:

<table>
<thead>
<tr>
<th>Name</th>
<th>Position</th>
<th>Signature</th>
<th>Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>Ed Clerk</td>
<td>Lead Auditor and Technical Specialist</td>
<td>[Signature]</td>
<td>9 March 2016</td>
</tr>
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1.6 Dates of Audit

The ICMC Certification Audit was conducted over two days between 13 and 14 December 2015.

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

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

2.1 Principle 1 - Transport

Transport Cyanide in a manner that minimises the potential for accidents and releases.

2.1.1 Transport Practice 1.1

Select cyanide transport routes to minimise the potential for accidents and releases.

☑ in full compliance with

☐ in substantial compliance with Transport Practice 1.1

☐ not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

Trident Shipping is in FULL COMPLIANCE with Transport Practice 1.1 requiring cyanide transport routes to be selected to minimise the potential for accidents and releases.

Trident Shipping has implemented a route assessment procedure to guide the selection and review of transport routes to minimise the potential for accidents and releases or the potential impacts of accidents and releases. The Route Selection and Risk Assessment Procedure prompts the persons undertaking the route assessment to identify hazards along the route which are then assessed in accordance with the Route Selection and Risk Assessment Procedure. Following a risk assessment, the procedure requires the Sodium Cyanide Emergency Response Plan (ERP) and Transport Management Plan (TMP) to be reviewed and updated to reflect any new risks identified or the implementation of risk controls or mitigation measures during the risk assessment process.

Trident Shipping has implemented processes and a procedure to periodically re-evaluate routes used for cyanide deliveries. The Route Selection and Risk Assessment Procedure and TMP note that route assessments will be reviewed and updated annually, or when there is a significant change to a transport route.

Trident Shipping has a process for providing feedback on route conditions during the journey and after each convoy. The TMP requires Feedback Reports to be completed by the Emergency Response Team (ERT) Leader after the return of each journey. These forms, along with continuous journey feedback verbally provided by drivers on the state of roads are also taken into consideration in route assessments.

Trident Shipping has documented measures taken to address risks identified with the selected routes within the TMP and Route Risk Assessments.

Trident Shipping seeks input from stakeholders and applicable governmental agencies as necessary in the selection of routes and development of risk management measures. Trident Shipping has identified supplier/distributor, government departments and the mine site as stakeholders and has engaged with them as appropriate.

Trident Shipping utilises road convoys to address safety concerns during transport and has developed a Convoy Management Plan (CMP) that details the requirements of transport in convoys.
The ERP identifies responsibilities for the Police, Fire Service, Ambulance, Centre Ivorien Anti-Pollution (CIAPOL), and the Mine Site as external responders. Trident Shipping has advised these external responders and medical facilities of their roles during an emergency response. Direct engagement of communities by Trident Shipping did not occur as the communities are not designated a role as part of the planned response to an emergency involving cyanide negating the need for community consultation on this issue.

Trident Shipping does not subcontract any of its cyanide transport operations within the scope of this audit.

2.1.2 Transport Practice 1.2

Ensure that personnel operating cyanide handling and transport equipment can perform their jobs with minimum risk to communities and the environment.

☑ in full compliance with

Trident Shipping is □ in substantial compliance with

☐ not in compliance with  Transport Practice 1.2

Summarise the basis for this Finding/Deficiencies Identified:

Trident Shipping is in FULL COMPLIANCE with Transport Practice 1.2 requiring personnel operating cyanide handling and transport equipment can perform their jobs with minimum risk to communities and the environment.

Trident Shipping only uses trained and competent operators to drive its trucks. All drivers are checked to ensure they have the correct and valid licence before being employed and prior to each trip departure. There is no requirement in Côte d’Ivoire for drivers to be licensed for dangerous goods transport.

The CMP details training requirements for all drivers and personnel involved in the handling and transportation of cyanide including that all old and new employees must have the following mandatory training prior to transporting cyanide:

- Defensive driving
- Basic fire fighting
- General cyanide awareness and familiarisation
- Emergency response scenario (mock drill) training.

A review of the training matrix and records indicated that the training was being conducted.

Trident Shipping uses only trained, qualified and licensed operators to operate its transport vehicles. Trident Shipping does not subcontract its cyanide transport operations within the scope of this audit.
2.1.3 Transport Practice 1.3

Ensure that transport equipment is suitable for the cyanide shipment.

☑ in full compliance with

Trident Shipping is ☐ in substantial compliance with Transport Practice 1.3
☐ not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

Trident Shipping is in FULL COMPLIANCE with Transport Practice 1.3 requiring that transport equipment is suitable for the cyanide shipment.

Trident Shipping only uses equipment designed and maintained to operate within the loads it will be handling when transporting cyanide. The TMP states that Trident Shipping conforms with all regulations and codes as applicable to the transportation of dangerous goods and prime movers and trailers shall be maintained to manufacturer’s specifications.

The Route Selection and Risk Assessment Procedure requires Trident Shipping to consider regulatory requirements that have the potential affect the transportation of dangerous goods in all countries through which it travels as part of the initial planning of the transport route. Specific requirements that are identified are incorporated within the TMP.

Trident Shipping has implemented a Maintenance Procedure. This procedure requires regular preventive maintenance services to be undertaken at or before the manufacture’s recommended mileage intervals. Services are undertaken by a qualified mechanic in accordance with the Preventative Maintenance Service Chart and the Preventative Maintenance Checklist. The procedure also requires pre-departure checks to be undertaken before each voyage. Trident Shipping manages its preventative maintenance program and data using a maintenance software, GESPAR.

Trident Shipping has procedures in place to prevent overloading of vehicles. The ERT Leader undertakes measures to ensure that the trucks transporting the consignment are roadworthy including ensuring all vehicles (prime movers and trailers) are inspected using the Pre-Departure Checklist. Specific truck/trailer combinations are also inspected (for transport of consignments) so that no combination is overloaded before leaving the port.

Trident Shipping does not subcontract any of its cyanide transport operations within the scope of this audit.
2.1.4 Transport Practice 1.4

Develop and implement a safety program for transport of cyanide.

☑ in full compliance with

Trident Shipping is ☐ in substantial compliance with ☐ not in compliance with

Transport Practice 1.4

Summarise the basis for this Finding/Deficiencies Identified:

Trident Shipping is in FULL COMPLIANCE with Transport Practice 1.4 requiring the operation develop and implement a safety programme for the transport of cyanide.

Trident Shipping has a Pre-Departure Checklist to ensure that the cyanide is transported in a manner that maintains the integrity of the producer’s packaging. This procedure requires Trident Shipping to check container seal integrity and the trailer twist locks for damage. The CMP requires information, including container and seal integrity to be supplied to the mine site before the convoy leaves port.

Placards are used to identify the shipment as cyanide, as required by international standards. Trident Shipping’s CMP requires that the containers used to transport solid sodium cyanide are marked with the required placards in accordance with International Maritime Dangerous Goods Code. The CMP also states that Trident Shipping conforms to regulations and codes as applicable for the transportation of cyanide.

The Route Selection and Risk Assessment Procedure requires Trident Shipping to consider regulatory requirements that have the potential to affect the transportation of dangerous goods in all countries through which it travels as part of the initial planning of the transport route. Specific requirements that are identified are incorporated within the TMP.

Trident Shipping has implemented a safety programme for cyanide transport that includes the following:

- **Vehicle inspections prior to each departure/shipment.**
  
  Trident Shipping has a Pre-Departure Checklist that is completed on all vehicles prior to departure.

- **A preventative maintenance program.**
  
  Trident Shipping has implemented a Maintenance Procedure. This procedure requires preventive maintenance services to be undertaken at or before the manufacture’s recommended mileage intervals. The procedure also requires pre-departure checks to be undertaken before each convoy. The preventative maintenance program and data is managed using GESPAR.

- **Limitations on operator or drivers’ hours.**
  
  Trident Shipping’s CMP includes a Fatigue Management Policy that provides measures to control fatigue. Some of these include:
  
  - Specified maximum driving times and mandated breaks.
  
  - Journey stopover points.

- **Procedures to prevent loads from shifting.**
  
  At the Port of Abidjan, containers are fastened after being loaded onto trailers using twist locks and container belts.

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Trident Shipping       9 March 2016

Name of Facility       Signature of Lead Auditor       Date
Procedures by which transportation can be modified or suspended if conditions such as severe weather or civil unrest are encountered.

Trident Shipping has a procedure to suspend operations for inclement weather or problems on the route.

The CMP notes that the ERT Leader will manage the convoy suitably in adverse conditions. This will include adjusting convoy speeds due to bad roads, weather or dust conditions.

A drug abuse prevention program.

Trident Shipping has a Zero Tolerance Drugs and Alcohol Policy. The Policy effectiveness is assessed through pre-employment and random alcohol testing in the workplace.

Retention of records documenting that the above activities have been conducted.

Records are retained and were observed confirming the above activities have been conducted.

Trident Shipping does not subcontract any of its cyanide transport operations within the scope of this audit.

2.1.5 Transport Practice 1.5

Follow international standards for transportation of cyanide by sea and air.

☑ in full compliance with

Trident Shipping is ☐ in substantial compliance with ☐ not in compliance with Transport Practice 1.5

Summarise the basis for this Finding/Deficiencies Identified:

Standard of Practice 1.5 requiring the operation to follow international standards for transportation of cyanide by sea and air is NOT APPLICABLE to Trident Shipping within the scope of this audit.

Trident Shipping does not transport consignments of cyanide by sea or air within the scope of this audit.

2.1.6 Transport Practice 1.6

Track cyanide shipments to prevent losses during transport.

☑ in full compliance with

Trident Shipping is ☐ in substantial compliance with ☐ not in compliance with Transport Practice 1.6

Summarise the basis for this Finding/Deficiencies Identified:

Trident Shipping is in FULL COMPLIANCE with Transport Practice 1.6 requiring the operation track cyanide shipments to prevent losses during transport.

Trident Shipping’s vehicles have means to communicate with the transport depot, the mining operation, the cyanide distributor and emergency responders. Trident Shipping’s vehicles use cell phones, radios and satellite phones to communicate with the transport depot, the mining operation, the cyanide producer and emergency responders. While in convoy, trucks must maintain radio or cell phone communication. A satellite phone is used in areas of no or limited cell phone communication. Escort personnel must call the Logistics Officer in Abidjan at designated Call Points along the route and all calls are logged in the communication log sheet.
Communication equipment is tested to ensure it functions properly either periodically or through continuous means. The Pre-Departure Checklist includes a check for phone and radio function, as does the Escort Vehicle Pre-Trip Checklist.

GPS tracking is checked prior to and throughout voyages through the review of reports generated by the tracking system. The GPS tracking system continuously transmits position and other data from the convoy throughout the trip. The combined use of cell phones and satellite phones has eliminated blackout areas along the transport route. Blackout areas are also checked for during the route survey process.

Trident Shipping has implemented inventory controls and/or chain of custody documentation to prevent loss of cyanide during shipment. After the initial inspection, a way-bill is generated by Trident Shipping for each container. The way-bill (duplicate and original) accompanies the Driver during the delivery. The way-bill includes a description of the goods, including container and seal details. This system is used as proof of delivery to customer mines.

The TMP requires all trucks and escort vehicles to have laminated cards showing the Safety Data Sheets for sodium cyanide.

Trident Shipping does not subcontract any of its cyanide transport operations within the scope of this audit.

2.2 Principle 2 - Interim Storage

Design, construct and operate cyanide trans-shipping depots and interim storage sites to prevent release and exposures.

2.2.1 Transport Practice 2.1

Store cyanide in a manner that minimises the potential for accidental releases.

☐ in full compliance with
☐ in substantial compliance with
☐ not in compliance with

Transport Practice 2.1

Summarise the basis for this Finding/Deficiencies Identified:

Transport Practice 2.1 requiring transporters design, construct and operate cyanide trans-shipping depots and interim storage sites to prevent release and exposures is NOT APPLICABLE to Trident Shipping.

Within the scope of this audit, there are no trans-shipping depots or interim storage sites, as defined in the audit protocol. Temporary storage in transit does occur at the Port of Abidjan while formalities such as customs clearance and carrier releases are performed. Once formalities are complete, the cyanide containers are collected from the Port of Abidjan and taken to the Trident Shipping transport storage yard where they are stored on the truck overnight in preparation for convoy departure at 0500 hrs the following morning. At no stage is the cyanide removed from the trucks or containers prior to unloading at the mine.

Trident Shipping

Name of Facility

Signature of Lead Auditor

Date

March 2016

Report No. 1542479-004-R-Rev0
2.3 Principle 3 - Emergency Response

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

2.3.1 Transport Practice 3.1

Prepare detailed Emergency Response Plans for potential cyanide releases.

- in full compliance with

Trident Shipping is

☐ in substantial compliance with

☐ not in compliance with

Transport Practice 3.1

Summarise the basis for this Finding/Deficiencies Identified:

Trident Shipping is in FULL COMPLIANCE with Transport Practice 3.1 requiring the operation prepare detailed Emergency Response Plans for potential cyanide releases.

Trident Shipping has developed an ERP which is specific to the design of the vehicles and transportation routes used by Trident Shipping. Section 3 of the ERP contains a Specific Emergency Response Guide that details incident types and it includes scenarios for truck transportation. It considers both the physical and chemical form of cyanide along with the method of transport. The consideration of transport infrastructure has also been undertaken by Trident Shipping through Route Risk Assessments. Route Risk Assessments detail the condition of the road, traffic hazards, intersections and issues to be managed by the driver along the route. The Route Selection and Risk Assessment Procedure considers the design of the intended transport vehicles.

The Specific Emergency Response Guide section of the ERP details incident types including the scenarios:

- Handling Wet Sodium Cyanide
- Rollover of Cyanide Container with spill in or outside a community
- Rollover of Cyanide container without spill in or outside a community.

A decontamination of a persons and equipment procedure is also included in the ERP.

The ERP details internal and external responsibilities in the event of an emergency including responsibilities specific to the three emergency incident types. Responsibilities are provided for ERT Leader, ER Team, Vehicle Driver, Trident Shipping, the Mine Site and external emergency services.

Emergency contact numbers for internal and external entities are provided in the ERP.
2.3.2 Transport Practice 3.2

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

☑ in full compliance with

Trident Shipping is ☐ in substantial compliance with Transport Practice 3.2

☐ not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

Trident Shipping is in FULL COMPLIANCE with Transport Practice 3.2 requiring it to designate appropriate response personnel and commit necessary resources for emergency response.

Trident Shipping provides initial and periodic emergency response training of appropriate personnel, including implementation of the ERP. Trident Shipping has developed and implemented a training scheme for its drivers and escort personnel. The minimum training requirements are:

- Defensive driving
- Basic fire fighting
- General cyanide awareness and familiarisation
- Emergency response scenario (mock drill) training.

A review of the Training Matrix indicated that the majority of drivers had completed the mandatory training. The ERT Leader checks drivers have the required up to date training prior to departure.

Descriptions of the specific emergency response duties and responsibilities for internal personnel and external entities are detailed in the ERP. These personnel/entities include:

- ERT Leader
- Vehicle driver
- Emergency Response Team
- Police services
- Ambulance services
- Fire services
- CIAPOL
- Trident Shipping
- Rangold/Tongon Mine Site.

Trident Shipping maintains a list of all of its emergency response equipment that should be available during the transport route. The quantity and condition of the equipment is checked as part of the Emergency Equipment Checklist, PPE Vehicle Pre-Trip Checklist and Pre-Trip Vehicle/Truck Checklist.

It is the ERT Leader’s responsibility to ensure that all emergency equipment is checked and are up to manufactures specification prior to convoy departure.

Trident Shipping does not subcontract any of its cyanide transport operations within the scope of this audit.
2.3.3 Transport Practice 3.3

Develop procedures for internal and external emergency notification and reporting.

☑ in full compliance with

Trident Shipping is □ in substantial compliance with □ not in compliance with

Transport Practice 3.3

Summarise the basis for this Finding/Deficiencies Identified:

Trident Shipping is in FULL COMPLIANCE with Transport Practice 3.3 requiring that they develop procedures for internal and external emergency notification and reporting.

The ERP and TMP contain procedures and current contact information for notifying outside response providers, and medical facilities of an emergency. The ERP and TMP contain Emergency Communication Procedures, an Emergency Call List, Medical Support and Emergency Equipment Contacts, and an Emergency Contacts of Other External Responders list. Emergency contact details for authorities, emergency responders and medical facilities are included in these procedures. It is stated that the Emergency responder’s information and phone numbers is checked annually and when it is updated it’s sent to responders for comments.

Systems are in place to ensure that internal and external emergency notification and reporting procedures are kept current. The Route Risk Assessment is reviewed twice a year or when there is a significant change to a transport route. The TMP and ERP are then updated as required and re-issued to medical providers and emergency services along the route for comment on whether the facility has capacity and capability to respond to a potential cyanide incident. As part of this process, emergency responder contact information is checked and updated as required if comment is received from emergency responder.

2.3.4 Transport Practice 3.4

Develop procedures for remediation of releases that recognise the additional hazards of cyanide treatment.

☑ in full compliance with

Trident Shipping is □ in substantial compliance with □ not in compliance with

Transport Practice 3.4

Summarise the basis for this Finding/Deficiencies Identified:

Trident Shipping is in FULL COMPLIANCE with Transport Practice 3.4 requiring that they develop procedures for remediation of releases that recognise the additional hazards of cyanide treatment.

Trident Shipping has a procedure for remediation, such as recovery or neutralisation of solutions or solids, decontamination of soils or other contaminated media and management and/or disposal of spill clean-up debris.

The ERP includes descriptions of the response actions for an anticipated emergency situation. The ERP includes descriptions covering clean up and decontamination of personnel and equipment, and response actions for three emergency scenarios; handling wet sodium cyanide; rollover of shipping container with spill in or outside a community; and rollover of cyanide container without spill in or outside a community.
Trident Shipping prohibits the use of chemicals such as sodium hypochlorite, ferrous sulfate and hydrogen peroxide to treat cyanide that has been released into surface water.

The ERP states:

*Under no circumstances will sodium hypochlorite or Ferrous Sulphate or any cyanide neutralizing chemicals be used in neutralizing cyanide that has entered surface water as this is strictly prohibited.*

### 2.3.5 Transport Practice 3.5

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

- [ ] in full compliance with

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<tr>
<th>Trident Shipping is</th>
<th>in substantial compliance with</th>
<th>Transport Practice 3.5</th>
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<td></td>
<td>[ ] not in compliance with</td>
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**Summarise the basis for this Finding/Deficiencies Identified:**

Trident Shipping is in FULL COMPLIANCE with Transport Practice 3.5 requiring the operation periodically evaluate response procedures and capabilities and revise them as needed.

The ERP states that:

*Emergency Response Procedures are audited annually. The function and structure of the Trident Shipping ERT is reviewed annually to ensure it effectiveness.*

*In case of any transportation incident and an investigation report issued, the company will review and revise the Emergency Response Procedures. Also, the ERP will be reviewed when necessary based on findings from yearly mock drills conducted by Trident Shipping.*

*Completed ERP will be issued to stakeholders for their comment.*

Trident Shipping has provisions for periodically conducting mock emergency drills. The CMP details mandatory training requirements for drivers and escort personnel which includes Cyanide Awareness and Mock Drill training.

### 3.0 IMPORTANT INFORMATION

Your attention is drawn to the document titled - “Important Information Relating to this Report”, which is included in Appendix A of this report. The statements presented in that document are intended to inform a reader of the report about its proper use. There are important limitations as to who can use the report and how it can be used. It is important that a reader of the report understands and has realistic expectations about those matters. The Important Information document does not alter the obligations Golder Associates has under the contract between it and its client.
Report Signature Page

GOLDER ASSOCIATES PTY LTD

Ed Clerk
ICMC Lead Auditor and ICMC Transportation Expert

MCW/EWC/eh

A.B.N. 64 006 107 857

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APPENDIX A
Important Information
IMPORTANT INFORMATION RELATING TO THIS REPORT

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Having regard to the matters referred to in the previous paragraphs on this page in particular, carrying out the Services has allowed Golder to form no more than an opinion as to the actual conditions at any relevant location. That opinion is necessarily constrained by the extent of the information collected by Golder or otherwise made available to Golder. Further, the passage of time may affect the accuracy, applicability or usefulness of the opinions, assessments or other information in this Report. This Report is based upon the information and other circumstances that existed and were known to Golder when the Services were performed and this Report was prepared. Golder has not considered the effect of any possible future developments including physical changes to any relevant location or changes to any laws or regulations relevant to such location.

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Any uncertainty as to the extent to which this Report can be used or relied upon in any respect should be referred to Golder for clarification.
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