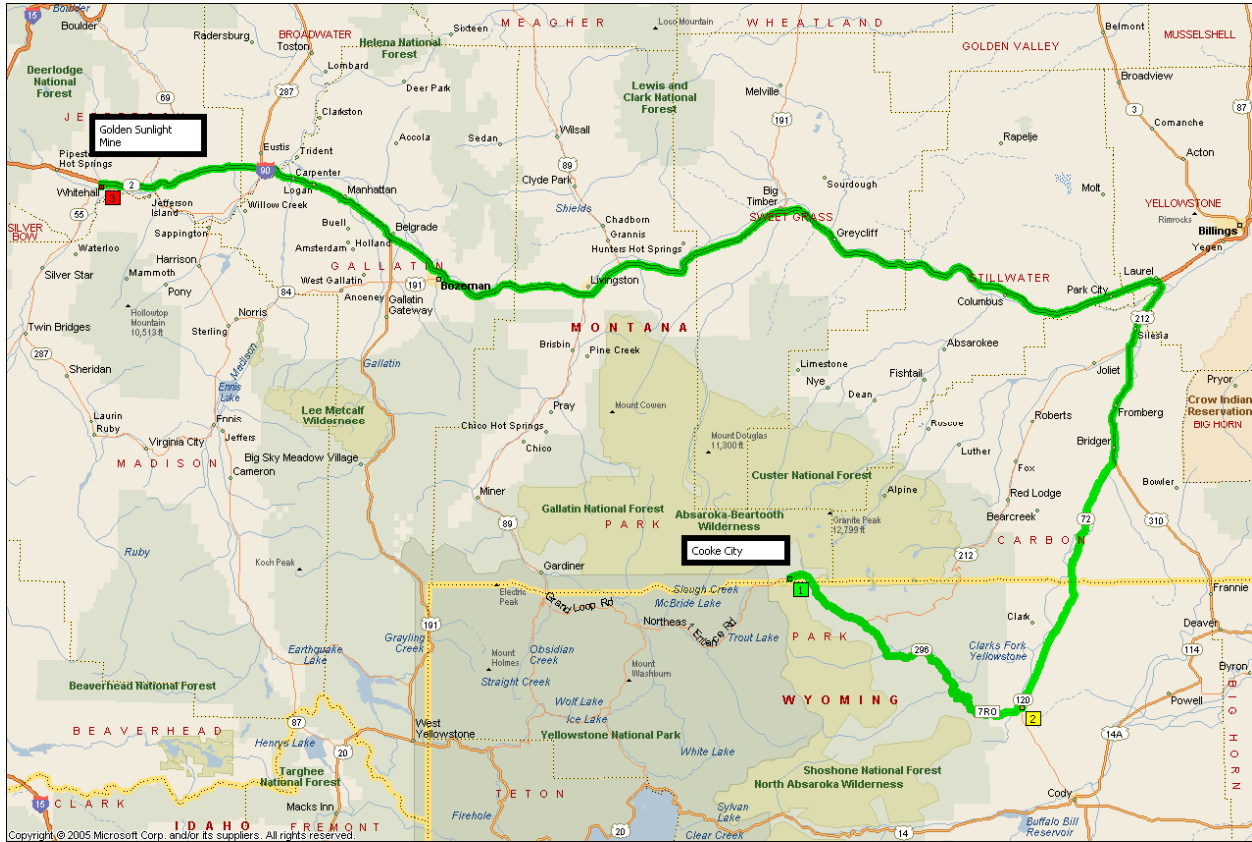


TRANSPORTATION PLAN

MCLAREN TAILINGS ABANDONED MINE RECLAMATION PROJECT

Prepared by: KNIFE RIVER – YELLOWSTONE DIVISION



Prepared for: Montana Department of Environmental Quality Project #410010



Introduction

Knife River – Yellowstone Division (Knife River) has a contract with Montana Department of Environmental Quality (DEQ) for reclamation of the McLaren Tailings Abandoned Mine Site near Cooke City, Montana. The project involves stabilization/dehydration of approximately 320,000 tons of mine tailings with quicklime (calcium oxide) so that the dehydrated tailings can be handled with conventional earth moving equipment. At the completion of the stabilization and removal activities, the site will be reclaimed.

Once stabilized/dehydrated with quicklime, the material will be hauled to one of two places:

1. Hauled and placed in an on-site repository (251,300 tons).
2. Hauled to the Golden Sunlight Mine (GSM) near Whitehall, MT for processing of gold from the ore and with placement of the tailings in the Golden Sunlight Mine's permitted tailings facility (68,700 tons)

Knife River has subcontracted the operations to Aulick Leasing (Aulick), Scottsbluff, NE to haul the ore to the Golden Sunlight Mine, located near Whitehall, Montana. The haul route utilizes MT 212, to WY 296, to WY 120/MT 72, to MT 212 again and then Interstate 90 to get from Cooke City, MT to Whitehall, MT.

This document is submitted to DEQ to satisfy contract bid item A-2b, Excavate, Load, Haul, Stockpile, Scale and Transport Stabilized Tailings Materials to Off-Site Processing Facility:

Contractor shall prepare and submit a Transportation Plan to the Engineer for approval a minimum of one month prior to commencing the transportation activities. The Transportation Plan shall identify the following: number of trucks to be utilized; capacity of the trucks; number of available truck drivers; scheduling; truck inspection records; schedule for maintenance and inspections; driver qualifications and resumes; Contractor and/or Subcontractors safety records for the past 3 years; and organizational chart.

This Transportation Plan addresses the required contract items as well as additional information including but not limited to: route-specific driver training, staging and a spill response plan.

1. Project Background

The McLaren Tailings Abandoned Mine Site (Site) is an abandoned hardrock mine/mill site located on Soda Butte Creek, a quarter mile east of Cooke City, Montana. It is located just south of Montana Highway 212 within Section 25, Township 9 South, Range 14 East, Park County, Montana.

In April 2010, DEQ awarded Knife River-Yellowstone Division the contract for site reclamation which included Bid Alternative A-2: Excavate, Load, Haul, Stockpile, Scale and Transport Stabilized Tailings Materials to Off-Site Processing Facility in Construction Year 2 (2011). Bid Alternative A-2 specifies the transportation of 68,700 tons of stabilized tailings to the GSM located near Whitehall, Montana for processing as ore material. Knife River has sub-contracted Aulick Leasing Corporation of Scottsbluff, Nebraska to transport the ore from the Site to GSM

2. Haul Route and Ore Analysis

2.1 Haul Route

The haul route specified in the contract documents is as follows:

“The haul route begins by turning right onto Highway 212 and proceeding east to the junction of Wyoming Highway 296. Then proceeding south along Highway 296; over Dead Indian Pass to the junction of Wyoming Highway 120; then proceeding north to Belfry/Laurel, Montana; then proceed west along U.S. Highway 90 to the Golden Sunlight Mine Site. The total miles per round trip is 640 miles. The use of Montana State Highway 212 through Yellowstone National Park is prohibited.”

Additional information is given in the contract documents about specific areas along the route as follows:

“Dead Indian Pass (elevation of 8,040 feet above mean sea level) on Wyoming Highway 296 is a mountainous pass with grades up to 7% with numerous tight switch-back curves. While the highway generally meets all modern standards; there are limited pull out locations, minimal shoulder width and no run-away truck ramps. The contractor shall use extreme caution when traveling through this section of the haul route.”

Concerns about the added truck traffic's impact to the condition of Wyoming Highway 296 (WY 296) led Shelby Carlson, PE, Wyoming Department of Transportation (WYDOT) District 5 Engineer, to request a desk review of the road condition and assessment of the probable impacts by Vicki Bonds, PE of WYDOT. The conclusion was that overall the pavement is in good condition and is expected to handle the additional truckloads except in areas where the subgrades are wet. There are areas of concern where drainage is poor, the subgrades are wet and the pavement is already showing distress. These areas are located mainly between Milepost (MP) 0 and MP 8 with additional isolated areas along the rest of the highway. WYDOT indicated that starting the haul after spring thaw, giving the subgrade a chance to dry out will reduce the chances of damage. As it is difficult to predict how the roadway will perform, WYDOT recommended monitoring the condition of the pavement during the haul and restricting haul weights if significant failure begins to occur.

2.2 Ore Analysis

The ore being transported is composed of tailings that have been stabilized with quicklime. The quicklime reduces the moisture content and the plasticity of the ore, which allows the material to be worked with conventional earth-moving equipment. Laboratory testing documented in the *Final Reclamation Design Report* (DEQ, 2009) indicated that the addition of quicklime generally reduced the concentration metals available to leach into water moving through the ore. The ore is composed primarily of quartz, feldspars, sulfides (mostly pyrite), iron oxides, calcium salts, and clay minerals. Metals detected in the ore include aluminum (Al), antimony (Sb), arsenic (As), barium (Ba), cadmium (Cd), chromium (Cr), copper (Cu), iron (Fe), lead (Pb), manganese (Mn), mercury (Hg), nickel (Ni), silver (Ag), and zinc (Zn). As reported in the Expanded Engineering Evaluation/Cost Analysis (EEE/CA; DEQ, 2002), five of the 14 metals are present at the McLaren Tailings Abandoned Mine Site at concentrations significantly above background levels. These metals consist of cadmium, copper, iron, mercury, and silver. Measured cadmium concentrations in the ore ranged from 0.88 to 10.5 parts per million (ppm), copper concentrations ranged from 21.4 to 3,680 ppm, iron concentrations ranged from 12,500 to 182,000 ppm, mercury concentrations ranged from 0.02 to 0.19 ppm, and silver concentrations ranged from 0.86 to 18 ppm. The maximum cadmium, mercury, and silver concentrations detected in the tailings were below the risk-based soil targets calculated for residential and recreational exposure. Iron and copper concentrations in the tailings exceeded their target concentrations for the residential exposure (see Table 5-1 in EEE/CA).

Toxicity Characteristic Leaching Procedure (TCLP) testing indicated that TCLP metals were not detected above regulatory limits (see Table A-3 from EEE/CA, on next page). As the ore is below EPA regulatory limits, it is not classified as a Hazardous Material, it does not meet the reportable quantities and is not required to be placarded under DOT regulations.



**TABLE A-3: TCLP METALS RESULTS - McLAREN TAILINGS SITE SAMPLES
September 2001**

SAMPLE NO.	As (ug/L)	Ba (ug/L)	Cd (ug/L)	Cr (ug/L)	Pb (ug/L)	Hg (ug/L)	Se (ug/L)	Ag (ug/L)
Tailings	33.4 U	35.4	11	9.4 U	39.8 U	0.07 U	62.3 U	8.1
McLaren-WR1-2	33.4 U	125	4.4 U	9.4 U	39.8 U	0.07 U	62.3 U	6.1
McLaren-WR1-3	33.4 U	31.9	4.4 U	11.1	39.8 U	0.08	62.3 U	17.6
REGULATORY LIMIT	5,000	100,000	1,000	5,000	5,000	200	1,000	5,000

NOTES:

U - Not Detected

WR - Waste Rock

ug/L - micrograms per Liter

3. Contract Specified Transportation Plan Items:

The contract requires nine items to be included in the Transportation Plan. The items are:

- Number of trucks
- Capacity of Trucks
- Number of Available Drivers
- Scheduling
- Truck Inspection Records
- Schedule for Maintenance and Inspection
- Driver Qualifications and Resumes
- Contractor and/or Sub-Contractor Safety Records for the Past 3 Years
- Organizational Chart

3.1 Number of trucks: 25 – 35; All trucks will have sleepers and will run at a WB-97D configuration (sleeper truck, 48-foot trailer, and 33-foot trailer). The picture on the front cover is typical of the type of haul truck that will be used. Typical truck configuration can be found in Appendix A.

3.2 Capacity of the trucks: 38 – 42 tons. Trailers will be double belly dumps. All trailers will be loaded to within 500 lbs. of their legal capacity and scaled prior to leaving the site. Gross weights will be determined and adjusted to comply with both Montana and Wyoming State Laws (Class W permits, 11 axles; allowable gross vehicle weight rating of trucks is 131,000 lbs). The Class W permit obtained for the trial run performed October 14, 2010 is presented in Appendix A.

3.3 Number of available drivers: 25 - 35. Each truck will be assigned one driver. Drivers and trucks will be rotated out for maintenance and inspection cycles. Below is a list of driver residence, years with Aulick and total years of driving experience:

Name	Location of Residence	Hire Date	Aulick Experience (Yrs)	Total Experience (Yrs)
Driver 1	NE	12/8/2004	5.8	11
Driver 2	WY	7/28/2001	9.1	11
Driver 3	WY	1/16/1993	17.7	20
Driver 4	NE	9/22/2003	7.0	16
Driver 5	NE	6/13/2006	4.3	26
Driver 6	NE	9/22/2003	7.0	21
Driver 7	NE	2/14/2005	5.6	23
Driver 8	SD	5/22/2000	10.3	39
Driver 9	NE	1/22/2006	4.6	7
Driver 10	NE	9/22/2003	7.0	9
Driver 11	WY	9/12/1988	22.0	25
Driver 12	NE	8/27/2003	7.1	30
Driver 13	NE	10/2/2004	6.0	18
Driver 14	NE	10/3/2005	5.0	35
Driver 15	NE	9/22/2003	7.0	24
Driver 16	NE	8/11/2003	7.1	25
Driver 17	NE	10/3/2005	5.0	9
Driver 18	WY	10/2/2007	3.0	23
Driver 19	NE	11/17/2006	3.8	38
Driver 20	NE	4/24/2006	4.4	22
Driver 21	NE	10/1/2004	6.0	11
Driver 22	WY	7/31/2003	7.1	21
Driver 23	CO	9/22/2003	7.0	27
Driver 24	WY	8/11/2008	2.1	8
Driver 25	WY	9/5/2000	10.0	17
Driver 26	NE	7/31/2001	9.1	19
Driver 27	NE	9/14/2009	1.0	12
Driver 28	NE	10/1/2004	6.0	10
Driver 29	NE	10/1/2004	6.0	21
Driver 30	WY	7/23/2007	3.2	18
Driver 31	CO	9/29/2008	2.0	31

3.4 Scheduling: The off-site haul is scheduled to begin in Construction Season 2 (June 1, 2011 – Oct. 15, 2011). The actual start of the haul will depend on the following 2 factors:

- Establishment of a stockpile of ore at the McLaren site.
- Portions of the subgrade of the Chief Joseph Highway are deemed to have dried sufficiently from spring moisture. This assessment will be performed by WYDOT, DEQ and Knife River.

The current plan is to begin hauling between June 1 and June 30, 2011. The haul will progress through the fall of 2011. The completion date is anticipated to be between September 15 and September 30, 2011. Hauling will occur Monday through Friday. Trucks will be loaded and scaled to comply with Montana and Wyoming weight limits at the McLaren site from 7:00 am to 7:00 pm. The number of loads per day will vary as a truck cannot make one complete cycle in a day.

Based on the start and completion dates, the trucks will haul approximately 120 loads per week to achieve the specified haul goal of 68,700 tons. The number of loads per day will vary as a truck cannot make one complete cycle in a day.

The typical driver’s week is shown on the following page. Anticipated travel times between the McLaren site and GSM are based on a trial run performed by Aulick on October 14, 2010 using a WB-97D configuration loaded with 41 tons of sand. Data collected during the trial run are presented in Appendix A. Staging will be important as a truck cannot make a complete cycle in a day. All trucks will have sleepers and drivers will take their mandatory breaks at truck stops along the main routes or at a planned staging area located near the jobsite at the Pilot Creek snowmobile parking area depending on where they are in the cycle. There are Hours of Service regulations (49 CFR 395) that limit the number of hours that drivers can work with mandatory hours off requirements. These limitations are also shown in the table below.

Property-Carrying CMV Drivers
<p>11-Hour Driving Limit May drive a maximum of 11 hours after 10 consecutive hours off duty.</p>
<p>14-Hour Limit May not drive beyond the 14th consecutive hour after coming on duty, following 10 consecutive hours off duty. Off-duty time does not extend the 14-hour period.</p>
<p>60/70-Hour On-Duty Limit May not drive after 60/70 hours on duty in 7/8 consecutive days. A driver may restart a 7/8 consecutive day period after taking 34 or more consecutive hours off duty.</p>
<p>Sleeper Berth Provision Drivers using the sleeper berth provision must take at least 8 consecutive hours in the sleeper berth, plus a separate 2 consecutive hours either in the sleeper berth, off duty, or any combination of the two.</p>

Hours of Service Rules

**Typical Driver Week
Cooke City, MT to Whitehall, MT**

Day	Task	Start Time	End Time	Hours	Drive Hours	Work Hours		
Monday	Pre Trip & Leave Laurel	3:30 AM	4:00 AM	0.50				
	Drive to Cooke City	4:00 AM	7:00 AM	3.00				
	Load & Tarp @ Cooke City	7:00 AM	7:30 AM	0.50				
	Drive Cooke City to Mine	7:30 AM	2:00 PM	6.50				
	Unload at Mine	2:00 PM	2:30 PM	0.50				
	Drive Mine to Bozeman vicinity	2:30 PM	4:00 PM	1.50				
	10 Hour Break @ Bozeman	4:00 PM	2:00 AM				11.00	1.50
Tuesday	Pre Trip Equipment	2:00 AM	2:30 AM	0.50				
	Drive Bozeman to Cooke City	2:30 AM	7:00 AM	4.50				
	Load & Tarp @ Cooke City	7:00 AM	7:30 AM	0.50				
	Drive Cooke City to Mine	7:30 AM	2:00 PM	6.50				
	Unload at Mine	2:00 PM	2:30 PM	0.50				
	10 Hour Break @ Whitehall	2:30 PM	12:30 AM				11.00	1.50
Wednesday	Pre Trip Equipment	12:30 AM	1:00 AM	0.50				
	Drive Whitehall to Cooke City	1:00 AM	6:00 AM	5.00				
	Wait at Pilot Creek Staging Area	6:00 AM	7:00 AM	1.00				
	Load & Tarp @ Cooke City	7:00 AM	7:30 AM	0.50				
	Drive Cooke City to Belgrade vicinity	7:30 AM	1:30 PM	6.00				
	10 Hour Break @ Belgrade	1:30 PM	11:30 PM				11.00	1.00
Thursday	Pre Trip Equipment	11:30 PM	12:00 AM	0.50				
	Drive Belgrade to Mine	12:00 AM	1:00 AM	1.00				
	Unload at Mine	1:00 AM	1:30 AM	0.50				
	Drive Mine to Cooke City	1:30 AM	6:30 AM	5.00				
	Load & Tarp @ Cooke City	6:30 AM	7:30 AM	1.00				
	Drive Cooke City to Bozeman vicinity	7:30 AM	12:30 PM	5.00				
	10 Hour Break	12:30 PM	10:30 PM				11.00	2.00
	Friday	Drive Bozeman to Mine	10:30 PM	12:00 AM			1.50	
Unload at Mine		12:00 AM	12:30 AM	0.50				
Drive Mine to Laurel vicinity		12:30 AM	4:30 AM	4.00				
					5.50	0.50		
TOTAL :					49.50	6.50		

3.5 Truck inspection records: Truck inspection records will be provided once the units have been assigned to the job, prior to any work being performed. All trucks and trailers will be inspected, repaired and maintained as required in 49 CFR 396, US Department of Transportation, Federal Motor Carrier Safety Administration (FMCSA). The 49 CFR 396 regulations are presented in Appendix B.

As required by 49 CFR 396.11 drivers will inspect their vehicles every day and summarize their findings in a report. Additional reports, as required by 49 CFR 396 will be provided. The daily driver inspection report shall cover at a minimum the following parts and accessories:

- Service brakes including trailer brake connections
- Parking brake
- Steering mechanism
- Lighting devices and reflectors
- Tires
- Horn
- Windshield wipers
- Rear vision mirrors
- Coupling devices
- Wheels and rims
- Emergency equipment

3.6 Schedule for maintenance and inspections: All trucks and trailers will be inspected daily by the driver. Any deficiencies will be noted. If the deficiency warrants the unit to be shut down the driver will communicate this to his supervisor. The supervisor will contact the Maintenance Manager, Roger Buskirk, for instructions on how to proceed with repair to ensure that the units are properly repaired, to comply with Aulick and FMCSA standards.

Typically trucks will be on a rotation to return to the repair / inspection facility every three weeks. A new Aulick maintenance/repair facility will be opening in early 2011 in Laurel, Montana. This three week rotation will apply even if there are no apparent problems with the unit. The computer core of most modern engines is called the Engine Control Module (ECM) which helps regulate and monitor vehicle performance. ECM downloads will occur while the truck is in the shop. Data to be analyzed will include but not limited to over speed and emergency braking.

3.7 Driver qualifications: All drivers must meet the following Aulick and FMCSA standards set forth in 49 CFR part 391:

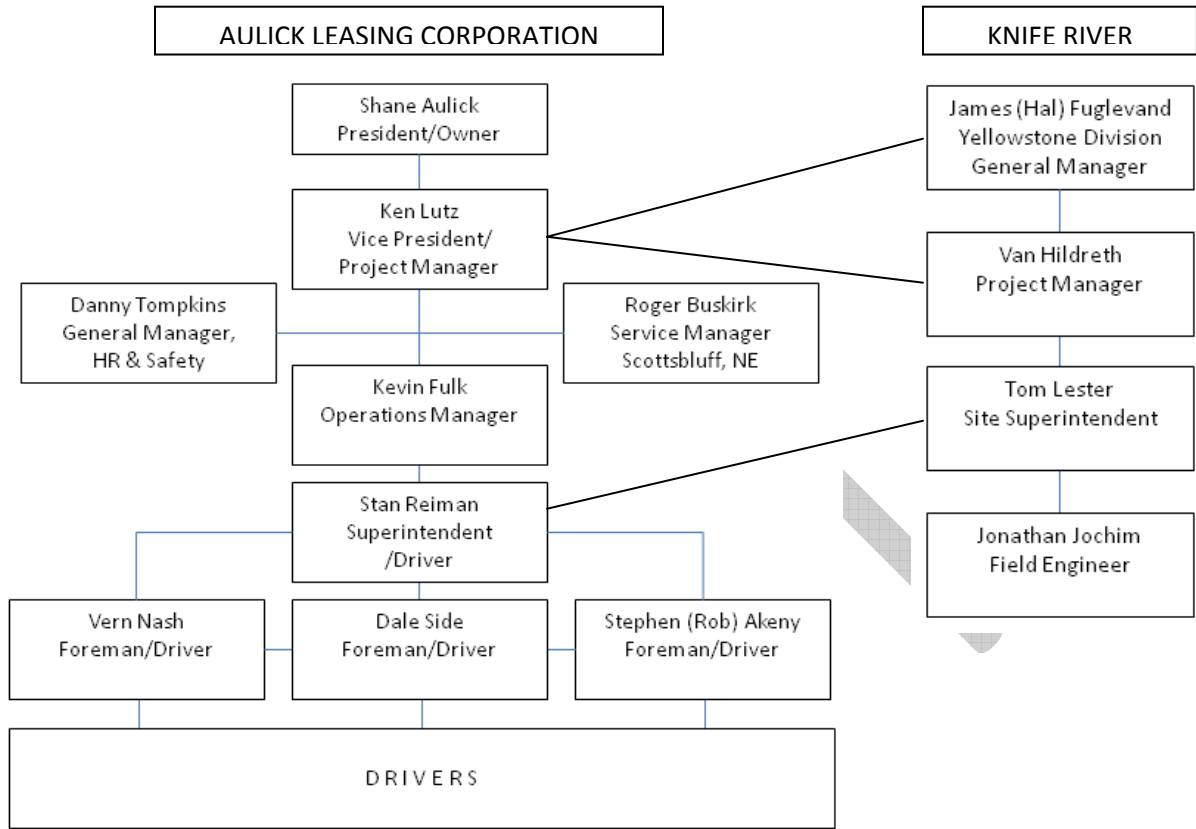
- a. Minimum age of 23 for Commercial Drivers.
- b. Minimum experience of 2 years operating tractor - trailer combinations for all Commercial Driver Positions.
- c. Commercial drivers are required to possess, furnish a copy, and certify to holding only one CDL Class A Commercial Drivers License (CDL) with the necessary endorsements as required for the position.
- d. All drivers who are hired to drive Commercial Motor Vehicles (CMV) will submit to, and successfully complete a drive test conducted by an Aulick authorized representative.
- e. The driving record for all Commercial Motor Vehicle drivers must meet the minimum standards set forth in 49 CFR. In addition the applicant must meet all Aulick Leasing Corp company policies regarding their driving record. The driver must not have incurred any of the following violations within the time period specified below:
 - 1) Within the previous four years preceding the date of employment, the driver must not have incurred any conviction of operating any motor vehicle under the influence of drugs or alcohol (DUI/DWI)
 - 2) Within the previous three years preceding the date of employment, the driver must not have incurred any of the following traffic violations set forth in 49 CFR Part 383.51.
 - **Excessive speeding**, involving any single offense for any speed of 15 miles per hour or more above the posted speed limit
 - **Reckless driving**, as defined by State or local law or regulation, including but not limited to offenses of driving a CMV in willful or wanton disregard for the safety of persons or property
 - **Improper or erratic traffic lane changes**
 - **Following the vehicle ahead too closely**
 - A violation, arising in connection with a **Fatal Accident**, of State or local law relating to motor vehicle traffic control
 - **Driving a CMV without obtaining a CDL**
 - **Driving a CMV without a CDL in the driver's possession**. Any driver who provides proof to the enforcement authority that issued the citation, by the

date the individual must appear in court or pay any fine for such a violation, that the individual held a valid CDL on the date the citation was issued, shall not be guilty of this offense.

- **Driving a CMV without the proper class of CDL** and/or endorsements for the specific vehicle group being operated or for the passengers or type of cargo being transported
- 3) Within the previous three years preceding the date of employment, the driver must not have been disqualified to drive a Commercial Motor Vehicle as outlined in 49 CFR Part 383.51 and 49 CFR Part 383.52
 - 4) Within the previous three years preceding the date of employment the driver must not have incurred more than five (5) moving violations.
 - 5) Within the previous twelve months preceding the date of employment the driver must not have incurred more than three (3) moving violations.
- f. All drivers of Commercial Motor Vehicles (CMV) will be required to submit to a DOT Physical Examination.
 - g. All drivers of Commercial Motor Vehicles (CMV) must submit both the DOT Physical Examination Long Form and Medical Card.
 - h. All Currently Employed Commercial Motor Vehicle Drivers are required to possess, renew as required (at their cost), and provide a copy of a current DOT Physical Examination Long Form and Medical Certificate.
 - i. All drivers must submit to a DOT approved Pre-Employment Drug Screen. In addition, the company must be in receipt of a negative drug test result before any driver is allowed to perform a Safety Sensitive Function as outlined in 49 CFR Part 395.
 - j. New drivers are located through employment services, newspaper advertisements, personal recommendations of employees or other contractors, personal applications, and State vocational Technical Schools etc.
 - k. Any driver must be able to perform their assigned job responsibilities. The company reserves the right to require physical and / or aptitude test if deemed necessary.
 - l. Commercial Motor Vehicle Drivers shall not be permitted to work while under the influence of alcohol, drugs, or other controlled substances. A company approved Doctor who understands the job requirements and DOT regulations must approve any prescription drug use for drivers.

3.8 Contractor and/or Subcontractor safety records for the past 3 years: The current FMSCA Audit and Safety Rating as well as the safety records for Aulick for the past three years is presented in **Appendix C**. The FMSCA confers ratings of Satisfactory or Not Satisfactory based upon inspections and reviews. Aulick received an overall Safety Fitness Rating of SATISFACTORY and received a rating of S in five of the six Rating Factors. They received an N or Not Applicable to Factor 5 the Hazardous Material Factor. Aulick is not a carrier of Hazardous Material

3.9 Organizational Chart



Additional information on Aulick Locations and Contacts is presented at the end of **Appendix C**.

4. Additional information:

Knife River's contract with Montana DEQ stipulates that the stabilized tailings are to be hauled to the Golden Sunlight Mine utilizing WY highway 296. This highway intersects US 212 (Beartooth Hwy) 14 miles SE of Cooke City. It then traverses south and east for 46 miles to its intersection with WY 120. The highway climbs over a mountain pass (Dead Indian Pass) with an elevation of 8000'.

Due to the mountainous location and scenic designation of this highway, Knife River has been requested to include additional information in this transportation plan. The following are items related to questions and concerns raised regarding this section of the haul.

4.1 Route Specific Driver Training: All drivers will receive route specific training prior to the start of hauling. The training will take place after the alignment site visit of August 5, 2010. Items to be included in this training will include but are not limited to:

- a. Avoiding collisions with wildlife and livestock. Drivers will be informed that the Chief Joseph highway travels through habitat for bears, deer, moose, other wildlife and livestock. Wyoming is an open range state, and while fencing exists along the road, it is not a guarantee that livestock won't be in the road. Drivers will be instructed to always be aware of the potential wildlife and livestock hazards on the roadway.
- b. Correct speed and transmission gears to utilize when climbing and descending Dead Indian Hill. Based on the results of the test haul (Appendix A), all drivers will be instructed to stay in 5th gear at no more than 22 mph while descending the entire pass .
- c. Maintaining truck and trailer in proper lane, especially on switch back curves. Even with double trailers, drivers will be able to maintain their lane (Appendix A).
- d. Proper distance to maintain between truck and other vehicles on roadway. Safe following distances vary depending on the speed and weather conditions. The general rule of thumb is to leave 1 to 1.5 seconds per 10 feet of vehicle length between the truck and the vehicle in front.
- e. Locations of potential hazards, namely access points to the road, including campgrounds, residential driveways, picnic areas, resorts, ranches and wildlife crossing areas. A comprehensive list was compiled, which will be provided to all drivers during training and is found on the following pages.
- f. Procedures to follow in case of breakdown.
 - i. Move truck off or away from road if possible.
 - ii. Deploy appropriate road hazard devices/markers
 - iii. Note breakdown location and contact supervisor or nearest truck and communicate give position and status.
 - iv. The maintenance vehicle will be dispatched to the location.
- g. Driver courtesy with the general public. Three courtesy truck pull over locations were identified during the test haul: at the Junction of Hwy 212/296 (MP 0), at the bottom of the pass (MP 25, Dead Indian Campground) and at the top of the summit (MP 32.7) (Appendix A).

- h. Locations of suitable turn-outs to use in case of mechanical or other problems. The Chief Joseph Highway contains a limited number of turn-outs along the roadway that are of sufficient length to allow usage by a double-trailer truck. The following tables include milepost locations of turn-outs that drivers can use in emergencies. This information will be provided to drivers during training.

DRAFT

Chief Joseph Milelog

MP	WB	EB	Description
0.00			Start of Chief Joseph Highway at US212
1.15	X		Driveway/Access Point Lake Creek Campground
1.60		X	Driveway/Access Point Hancock Ranch
1.90		X	Short paved turn-out
2.28-2.45		X	Scenic turn-out, single paved lane w/ two access points
3.15		X	Driveway/Access Point
3.50		X	Short paved turn-out
4.10	X		Driveway/Access Point
4.40		X	Virgil's Lair, River Lane Access Point
4.50			Driveway/Access Point
4.59			Driveway/Access Point
4.75		X	Hunter's Peak
4.80	X		Clarks' Fork Trailhead Access Point
4.90		X	Black Rock Lane Access Point
5.10		X	Driveway/Access Point
5.15	X		Driveway/Access Point
5.26		X	Hunter's Peak Ranch Driveway
5.35		X	Driveway/Access Point
5.40	X		Driveway/Access Point
6.10	X		Painters Outpost Entrance
6.10		X	Paved turn-out
6.25	X		Higgins Lake Road
6.30		X	County Road XUX Access Point
6.40		X	Driveway/Access Point
6.50		X	Driveway/Access Point
6.55	X		Bobcat Trail Access Point (Gated, Private Road)
6.70	X		Crandall Park Lake Road Access Point
6.80		X	Driveway/Access Point
6.96	X		Bugle Lane or Buell Lake Access Point
7.40		X	North Crandall Trailhead Access Point
7.40	X		Driveway/Access Point (Forest Service Road 165)
7.60		X	Driveway/Access Point
7.70	X		Driveway/Access Point
7.90		X	Crandall Ranger Station - Hurricane Mesa Road Access Point
8.18		X	Driveway/Access Point
8.40	X		Driveway/Access Point
8.80		X	County Road XVW (K Bar Z Ranch) Access Point
9.38		X	Scenic Area turn-out
10.90	X		Unpaved Access Point
11.00		X	Unpaved Access Point
11.25	X		Logging Area with Access Point on Highway
11.60		X	Reef Creek Picnic Area Access Point
11.70	X		Driveway/Access Point
11.75		X	Driveway/Access Point
12.45	X		Scenic Area turn-out
12.90	X		Driveway/Access Point
13.90	X		Scenic Area turn-out

Chief Joseph Milelog (cont'd)

MP	WB	EB	Description
15.50		X	Driveway/Access Point
16.00	X		Driveway/Access Point
16.00		X	Driveway/Access Point to Unpaved parking area
18.60	X	X	Paved turnaround area, water access point
19.30	X		Paved Scenic turn-out
19.40		X	Russell Creek Ranch Driveway/Access Point
19.70	X		Driveway/Access Point
19.70		X	Driveway/Access Point (Gate through fence)
20.10		X	Ranger Station Driveway/Access Point
20.20		X	WYDOT Maintenance Station Driveway/Access Point
20.20	X		Driveway/Access Point to Trails
21.30	X		Unpaved turn-out
21.60	X		Driveway/Access Point
22.47		X	County Road 7GR
23.05	X		Scenic turn-out, outhouses, driveway is blind to west
23.40		X	Sunlight Basin Road (County Road 7GQ)
25.00		X	Driveway/Access Point
25.00	X		Driveway/Access Point Dead Indian Campground
25.20	X		Driveway/Access Point Dead Indian Campground
25.70	X		Driveway/Access Point
27.60		X	Paved turn-out, along curve, roughly 100'-110'
28.00	X		Unpaved turn-out, 100'-120'
28.60		X	On curve paved turn-out, 100'
29.20	X		Unpaved turn-out, 175'-200'
31.75	X		On curve paved turn-out, 100'
32.70		X	Top of Dead Indian Pass, paved parking area with outhouse
32.85	X		Driveway/Access Point to radio towers
32.96			Station Equation, loses some of MP 33
34.00	X		Paved turn-out, roughly 250'-300'; Driveway/Access Point
34.00		X	Driveway/Access Point
34.58	X	X	Driveway/Access Points (Gated)
34.90	X		Driveway/Access Point (Gated)
35.18		X	Painter Road Access Point - Al Mickelson Field Station
36.18		X	Driveway/Access Point - Cattle Load/Ramp w/ Parking Area
36.70		X	Driveway/Access Point
37.10	X		Short paved Scenic turn-out, along curve
37.30	X		Paved turn-out, 150'±
38.10		X	Paved turn-out, 120'-150', USFS Sign
39.00	X		Short paved Scenic turn-out, along curve, 100'
39.80		X	Long paved Scenic turn-out, along curve, 300'
40.55		X	Paved parking area turn-out, 200'-250'
44.9-45	X		Paved pull-off, staging area, 500'-600'
45.50	X		Driveway/Access Point
46.00	X		Driveway/Access Point
46.00		X	Driveway/Access Point - Two Dot Ranch Headquarters
46.20			Intersection with WY120

4.2 Staging Area: Contact has been made with the Shoshone National Forest and an application has been received to enable Aulick to apply for a Special Use Permit to utilize the snowmobile parking area across from the Pilot Creek Trailhead turnout as a Staging Area. The area is large and relatively flat which will allow the trucks to operate without problems. This staging area will be used by drivers to take their mandatory rest breaks when they are near Cooke City. Other staging areas along the route will either be at Aulick's Laurel Facility or at truck stops along the I-90 corridor.

4.3 Communications: All trucks will be equipped with citizen band (CB) and business band (two-way) radios. The truck supervisor will have the same radios in his vehicle. In addition to Business Band, and CB Radios, the Superintendent Stan Reiman and Foremen Stephen Akeny, Vernon Nash and Dale Sides, currently assigned to this job, have BlackBerries and cell phones to aid in communicating any incident or situation that may arise.

Safety Meetings will be held on a weekly basis. In response to any situation that may arise, Safety Meetings will be held daily to address these issues. All Safety Meetings will be documented and have a written agenda.

4.4 Maintenance & Support Vehicle (Rover): The pictures below are of the Maintenance and Support Vehicle that will be used for this job. It is constructed to handle breakdowns and normal vehicle maintenance. This vehicle is a "mobile shop on wheels" and will be operated by a fully qualified Aulick Leasing Technician/Mechanic.



The Rover will be available to vehicles along the Haul Route but will concentrate its time to the haul between the McLaren Site and intersection of Wyoming Highways 296 and 120. An additional piece of equipment will be provided to pull a loaded haul vehicle up the Pass if it breaks down or otherwise is caused to stop on the haul up. This vehicle will most likely be a tractor or motor grader and will be staged at the foot of the pass.

4.5 Identification of trucks: All trucks and trailers will be clearly marked with a unique unit number.

4.6 Complaint procedure: All supervisors and drivers assigned to this job have been trained in how to handle complaints from the motoring public. All complaints will be referred to Daniel Tompkins, General Manager of HR & Safety, in the Scottsbluff NE office. Daniel will interview the complaining

party and the driver of our vehicle. Daniel will also convey the complaint information to Van Hildreth with Knife River.

4.7 Ongoing Supervision and Training: After the initial training and orientation, all drivers assigned to the job will be subject to ongoing training and daily supervision. At all times there will be at least one supervisor assigned to this job.

4.8 Supervisor Responsibilities: The supervisors assigned to this job have been trained in employee dispute resolution / disciplinary procedures, public complaints, breakdown, and accident response, and Reasonable Suspicion for drug and alcohol misuse/abuse.

The on the ground supervisor will rove the route in a pickup with communication devices that will allow the supervisor to respond quickly to any situations that may arise. Again, like the Rover, the Supervisor will be available along the whole route, but will concentrate on the First Stage of the haul, between the Site and the Wyoming border.

4.9 Securing loads: All trailers will be belly dump type. The gates of each trailer will be secured from accidental opening with a boomer and chain that can only be released by stopping the truck, the driver getting out and releasing the boomer, and then getting back in the truck and opening the gates from the cab.

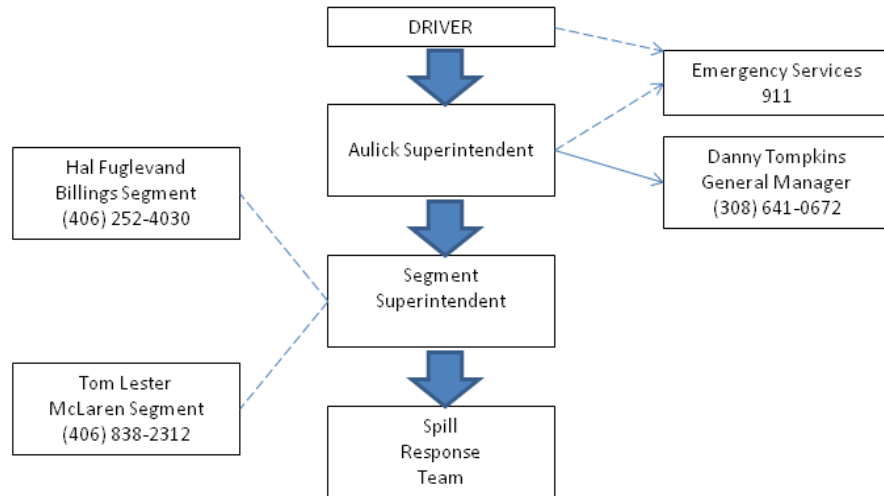
4.10 Tarping. All ore loads leaving the McLaren site will be tarped.

4.11 Traffic Signs: Heavy Truck Traffic signs will be posted along WY 296 on either side of Dead Indian Pass.

4.12 Spill Response Plan: The spill response plan has been developed to ensure that if an incident occurs, Knife River will be able to respond in an efficient and timely fashion. The transported material being discussed is a solid ore material, not a liquid.

The Site Response Team will be responsible if incidents occur between the McLaren site and WY120 where it crosses the Wyoming border (MT72). Responses to any incidents from the Montana border to GSM will be handled by the Billings Office Response Team depending on the incident location.

- a. **TEAM:** The On-Site Knife River McLaren Site Response Team consists of the Site Supervisor, the equipment operator and the operator that will haul the equipment. The Office Response Team consists of a Manager, a Supervisor and two equipment operators.
- b. **COMMUNICATION:** Due to the lack of towers and the mountainous terrain, communication using cell phones along WY296 Chief Joseph Highway is not reliable. All Aulick trucks transporting ore are equipped with CB and two-way radios. In a turnover event, the truck driver will need to ensure his own safety, contact emergency vehicles, and then contact other trucks along the route to notify the Site Supervisor that an incident has occurred, the road they are on and the approximate milepost where the incident is located. In areas where cell coverage is available, the driver will contact the Office Response Team Supervisor.



The Supervisor will begin coordination efforts by contacting the Manager and sending the response equipment to the incident location. The Manager will be responsible for contacting the Owner (DEQ) and the Owner’s Representative (Pioneer Technical Services, Inc.). The Manager will also contact the Maintenance Supervisor for either the Montana Department of Transportation (MDT) or WYDOT, depending on which section the incident takes place.

- c. **RESPONSE EQUIPMENT:** The planned equipment is a loader backhoe (John Deere 310G) and a 1 ton truck with a trailer to deliver the equipment to the incident site. The truck will also carry either straw wattles or silt fence to help contain the ore and keep it from spreading in the event that rain occurs during response activities. The spilled ore will be collected using the loader backhoe, loaded into an empty, returning haul truck, and either transported back to the Site or on to GSM, depending on location of the spill.
- d. **RESPONSE TIME:** Response team is anticipated to leave the site within 0.5 hours, be to the spill within 0.5-1.5 hours along Wyoming portion or 1-4 hours along Montana portion of route. An empty haul truck can be waylaid and filled within 3-4 hours. Total response time from spill to end of clean-up is not anticipated to be longer than 24 hours.