

From: Deni Chambers, CEM
Derrick Willis, CEM

Date: December 10, 2010

To: Shannon Harbour, PE
Nevada Division of Environmental Protection (NDEP)

RE: Nevada Division of Environmental Protection Request for Data for Review of Mn
Tails Excavation Plan, email dated December 16, 2010

COMMENTS:

Please find attached an updated figure and corresponding data table that presents data both from the Phase B Investigation and Pre-Confirmation sampling programs. Please note that the Phase B data presented on both map and table are depth corrected to reflect the removal of the manganese tailings pile.

As indicated in the December 3rd memorandum, the southern extent of excavation polygons RZ-C-45-B/C/D abut the 3:1 slope from the former manganese tails area to the leach plant area. A slope existed in this area prior to filling the area with manganese tailings. When the manganese tailings were removed, the slope was excavated to 3:1 and the limits of the slope set to remove as much manganese tailings materials as possible and still support an active gas line that is present approximately five feet from the top-of-slope, as shown in Figure 3 of the RZ-C Excavation Plan. The slope cannot be moved significantly southward without reducing the required depth of embedment of four feet and reducing vertical and lateral support. Based on the physical conditions, if the Contractor were to pothole and establish the exact location of the gas line, a maximum vertical excavation of approximately 1.5 feet could be possible, if the gas line is in the position shown on design drawings.

Northgate will pothole the gas line upslope from RZ-C-45B and RZ-C-45D to assess if further excavation is possible on the slope in these areas. The portion of the slope that can't be addressed with excavation will be included in the Environmental Covenant plan. The Environmental Covenant will include an engineering control.

RZ-C-45-A is just south of the former manganese tailings pile area and will be excavated during the implementation of balance of RZ-C. Due the depth of the scrape, it is not anticipated that this excavation and backfill will conflict with the utility corridor.

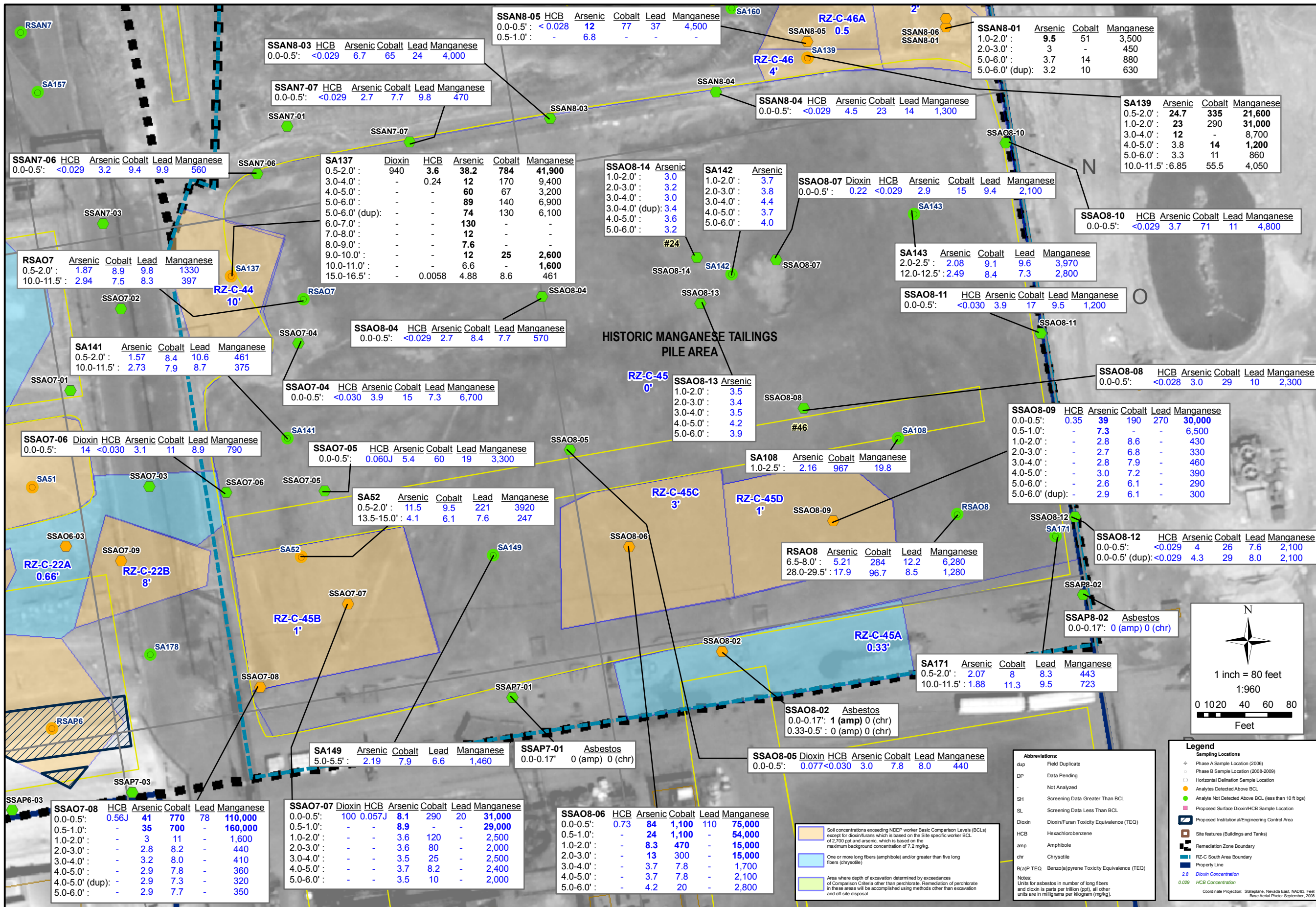
Please contact us if you have any questions.

Attachments:

Table MN Tailings Pile Data 12-9-2010

Figure Manganese Tailings Sample Locations





DESIGNED BY:	CW	DRAWN BY:	KH	CHECKED BY:	CW	APPROVED BY:	DW
REVISIONS:	NO.	DESCRIPTION:	DATE:	BY:			

MANGANESE TAILINGS SAMPLE LOCATIONS		PROJECT NUMBER:	
Tronox LLC Henderson, Nevada		2027.08 T10	
SCALE:	1 in = 80 ft	DATE:	12/10/2010

FIGURE NUMBER:	1
SHEET NUMBER:	1