

From: [Gillies, Sandy MEM:EX](#)
To: [Kamloops, MMD MEM:EX](#)
Subject: FW: 32936_Inspection_Report
Date: Thursday, June 26, 2014 7:34:10 AM
Attachments: [Mine Inspection June 17-14.pdf](#)

Regards

Sandy Gillies

Inspector of Mines Mechanical

2nd. Floor - 441 Columbia Street

Kamloops, BC V2C 2T3

Office: 250-828-4465

Cell: 778-257-1604

Fax: 250-828-4154

e mail: Sandy.Gillies@gov.bc.ca

From: Steve Gurney [<mailto:sgurney@absorbentproducts.com>]
Sent: Wednesday, June 25, 2014 12:16 PM
To: Gillies, Sandy MEM:EX
Subject: FW: 32936_Inspection_Report

Dear Sandy

Please see the attached Inspection Report.

Thanks

Steve

From: Peter Aylen
Sent: Friday, June 20, 2014 11:25 AM
To: Steve Gurney; Paul Boileau
Subject: FW: 32936_Inspection_Report

From: Gillies, Sandy MEM:EX [<mailto:Sandy.Gillies@gov.bc.ca>]
Sent: Wednesday, June 18, 2014 8:39 AM
To: Peter Aylen
Cc: Rothman, Stephen MEM:EX
Subject: 32936_Inspection_Report

Wednesday, June 18, 2014

File: 18070-02-08
Mine No.: 1500021

Peter Aylen
Owner
724 East Sarcee Street
Kamloops BC, V2H 1E7

Dear Sir:

Re: Mine Inspection June 17, 2014
Property: Red Lake Quarry

Enclosed is a copy of my Inspection Report for the above noted property and date.

Please have this report posted in a conspicuous place on the property accessible to the workers in accordance with Section 30(1) of the Mines Act.

As noted on page one of the report, please fill in the appropriate areas responding to the Inspector's comments, sign and date the first page, initial the subsequent page(s) and return a copy with your comments to the writer.

Yours truly,



Sandy Gillies
Inspector of Mines, Mechanical

Enclosures

From: [Ludwig, Al MEM:EX](#)
To: [Kamloops, MMD MEM:EX](#)
Subject: FW: Red Lake Quarry 2014 annual reclamation report
Date: Friday, February 27, 2015 1:04:31 PM
Attachments: [Reclamation2014.docx](#)
[Fig3MainPit2014.xlsx](#)
[Fig4WestPit2014.xlsx](#)
[Fig5NorthwestPit2014.xlsx](#)
[Fig6BeppePit2014.xlsx](#)

From: Peter s.22
Sent: February 24, 2015 3:42 PM
To: Ludwig, Al MEM:EX
Subject: Re: Red Lake Quarry 2014 annual reclamation report

Al:
Attached please find a digital copy of Absorbent Products Ltd. 2014 Reclamation Report revised according to your three points in your e-mail dated February 3, 2015.
Peter Read

On Tuesday, February 3, 2015 12:53 PM, "Ludwig, Al MEM:EX" <Al.Ludwig@gov.bc.ca> wrote:

Hi Peter

I have reviewed the report and note that there appears to be a couple of errors as indicated below:

- Page 7 – Table 2 (not Table 3) gives the trace element analysis for the last 4 quarters
- Page 7 - there does not appear to be a table showing the monthly pH results.
- There should be an indication where the sampling points were taken.

Please make the corrections/additions and forward us the revised copy.

Al Ludwig
Inspector of Mines
250 828 4428

Ludwig, Al MEM:EX

From: Ludwig, Al MEM:EX
Sent: February 3, 2015 11:00 AM
To: 'Steve Gurney (sgurney@absorbentproductsltd.com)'
Subject: Red Lake Quarry, mine no. 1500021 Annual Reclamation report

Hi Steve

I have a few questions that I would like to discuss with Peter Read re the 2014 Annual Reclamation Report. Do you have his email address? Also have you ever submitted a Mine Emergency Response Plan to our office?

Regards

Al Ludwig
Inspector of Mines
250 828 4428

From: [Adams, Rick MEM:EX](#)
To: [Kamloops, MMD MEM:EX](#)
Subject: FW: Red Lake Claims Mine #1500021
Date: Wednesday, January 29, 2014 11:46:01 AM

I discussed the request below with Steve Gurney today. I advised First Nations consultation must occur for any statutory decision whether on Crown or private land, but also advised of our Available On Request process for low risk activities including mechanical disturbance <0.5 ha.- but the collective disturbance area of the excavation for the bulk sample, waste piles, and access road would have to be less than 0.5 ha.

Rick Adams

From: Steve Gurney [<mailto:sgurney@absorbentproductsltd.com>]
Sent: Tuesday, January 28, 2014 3:22 PM
To: Adams, Rick MEM:EX
Subject: Red Lake Claims

Hi Rick

We are wanting to submit a Bulk Sample request for the Red Lake Claims. These are the claims that our current mine sits on. Do you think it is going to be necessary to consult First Nations considering the work is on Private Land and will be 100 meters or so away from the current pit? This land is owned by Absorbent Products and we have not involved First Nations in the past history of activities in this area.

Your input is appreciated.

Sincerely,

Steve Gurney, Vice President

724 East Sarcee Street, Kamloops, BC V2H 1E7
(250) 372-1600, EXT: 111, FAX: (250) 372-3777
Toll Free: 1-800-667-0336 www.absorbentproductsltd.com



Ludwig, Al MEM:EX

From: Ludwig, Al MEM:EX
Sent: March 20, 2015 3:48 PM
To: 'Steve Gurney'
Subject: RE: Mining Info, Red Lake Quarry, mine no. 1500021

Hi Steve

The Notice of Work has been upgraded and can only be submitted online. Your original NOW that was submitted years ago would not have much relevance to your present operation. You should also be aware that effective April 1st there will be an application fee that is applicable and you may save a few thousand if you get your application in before the fee comes into effect.

Your mine plan should include all area showing the reclaimed areas, disturbed and active areas and proposed mining areas. Cross sections should show the existing surfaces, final proposed reclaimed surfaces and an indication of the mining over the next 5 years.

Al Ludwig
250 828 4428

From: Steve Gurney [<mailto:sgurney@absorbentproducts.com>]
Sent: March 2, 2015 10:45 AM
To: Ludwig, Al MEM:EX
Subject: Mining Info

Hi Al

We are working on the new Notice of Work and updated Mine Plan.

Could you confirm with me that the update would be to the mining plan that is dated September 10, 1998 titled, "Mining Plan For The Kitty Claims in Sec 12 LSD 4". Would it also be possible to send me a copy of the Notice of Work that was also submitted at that time.

Thanks for your help.

Sincerely,

Steve Gurney, Vice President



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Toll Free: 1-800-667-0336 www.absorbentproducts.com



Ministry of
Energy and Mines

Province of British Columbia
**Ministry of Energy and
Mines**

Report of Inspector of Mines
(Issued pursuant to Section 15 of the *Mines Act*)

Inspection No.: 27499
File: 18070-02-08
Mine No.: 1500021
Permit No.: Q-11-001
Emp/Cont: 2 / 0
Orders H&S: 12 RECL: 0
Stop Work: 0

Inspection Report

| | | | |
|----------------|-------------------------|-----------------|--|
| NAME OF MINE | Red Lake Quarry | LOCALITY | 50.933, -120.817 Kamloops |
| OWNER/OPERATOR | Absorbent Products Ltd. | ADDRESS | 724 East Sarscoe Street Kamloops BC V2H 1E7 |
| MANAGER | Peter Ayles | AREAS INSPECTED | Shop; Combo Trailer, Pit and Yard |

Persons Contacted

MANAGEMENT

OHS COMMITTEE

WORKERS Dave Bowers

A copy has been forwarded to the Joint Occupational and Safety Committee and the union as applicable. The Mine manager shall complete the right hand column noting specific corrective actions taken by a specified date, and return a copy to the Inspector within 15 days of receiving the report. Further the manager shall post a copy to the bulletin board, to be replaced by a copy showing the manager's response. In this document, Code means Health, Safety and Reclamation Code for Mines in British Columbia.

INSPECTION ORDERS

This inspection was conducted on October 10/13 by Sandy Gillies Inspector of Mines Mechanical and Rick Adams Inspector of Mines. The following orders were issued as a result of the inspection.

1.8.1 The manager shall

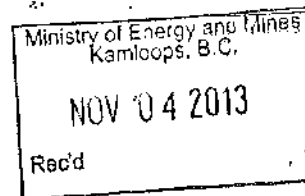
- (1) except for protective footwear and prescription eyeglasses, supply properly fitted personal protective equipment as required by the code,
 - (2) ensure that workers are instructed in the use and maintenance of the equipment, the reasons for it, and also on its location and limitations, and
 - (3) ensure that the equipment is adequate for its purpose.
- Workers' Responsibility**

1.8.2 All persons shall wear the personal protective equipment as required by the code.

Protective Hat 1.8.3

MANAGERS RESPONSE OF ACTION TAKEN

DO NOT MODIFY THIS TEXT



Sandy Gillies

Inspector of Mines, Mechanical

2nd Floor, 441 Columbia Street Kamloops BC V2C 2T3

Address

Date of Inspection: 10/10/2013

Copies To Steve Rothman.

Signature - Inspector of Mines

Signature - Manager

Dated: Oct/30/2013

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Report of Inspector of Mines Page 2 of 4

INSPECTION ORDERS

A protective hat complying with the relevant requirements of CSA Standard Z94.1-M1977 "Industrial Protective Headgear," and suitable for the type of work or activity being performed, shall be worn by persons where there is a risk of head injury or where required by the manager or an inspector. Where conditions may cause the hat to be accidentally dislodged

- (1) a device shall be incorporated into the hat and worn in order to prevent the hat being dislodged during a fall, and
- (2) in the case of underground work, a chin strap and hearing protection muffs attached to the hat shall be worn.

Protective Footwear

1.8.4 Protective footwear complying with the relevant requirements of CSA Standard Z195-M1984 "Protective Footwear", and suitable for the type of work or activity being performed, shall be worn by persons where there is a risk of foot injury or where required by the manager or an inspector.

Eye Protection 1.8.5

Properly fitting goggles, face shields, or other eye protective equipment complying with the relevant requirements of CAN/CSA Standard Z94.3-M88 "Industrial Eye and Face Protectors," and suitable for the type of work or activity being performed, shall be worn by a person who

- (1) is handling or is exposed to any material which is likely to injure or irritate the eyes,
- (2) is engaged in any work in which there is a risk of eye injury,
- (3) has 20/200 vision or is blind in either eye, or
- (4) is working or passing through an area which the manager or inspector has designated as requiring such protection.

Employees were found to be without hard hats and safety glasses.

The manager shall ensure that all employees are properly equipped for working on a mine site by October 11/13.

Workplace to Be Hazard Free

2.2.1 The manager shall develop and implement an effective housekeeping program to ensure that all workplaces and travel ways are maintained in a safe condition, that materials and equipment are stored in a manner so as not to endanger persons, and that appropriate action is taken whenever necessary to maintain a hazard-free environment.

During the inspection it was clear that no or very little clean up is done on site especially in the FIRST AID area. A lot of clutter throughout this COMBO trailer is not acceptable. A gas generator is in the First Aid area oils are stored in another area but all in the same trailer.

MANAGERS RESPONSE OF ACTION TAKEN

all employees shall wear protect Headgear High vis clothing, Eye protection upon leaving trailer to Work.


BA

on going house keeping, trailer Replacement Being taken care of, Removed items in question

Date of Inspection

10/10/2013

Initials



(Inspector)

Initials

(Manager)

Report of Inspector of Mines Page 3 of 4

INSPECTION ORDERS

MANAGERS RESPONSE OF ACTION TAKEN

The manager shall cause this situation to be corrected by October 17/13

4.3.8 Every fuel storage tank shall

- (1) have a means of accurately determining the amount of fuel it contains,
- (2) be identified as to its contents and that it is a fire hazard area.

The manager shall have 3 more placards attached to the fuel dispensing tank.

Welding and Burning Equipment 4.4.7

- (1) Whenever torches or welding equipment are being transported or used, the manager shall require that safe procedures are developed and followed.

- (2) Every compressed gas cylinder containing fuel gas or other gas, when not in use, shall

- (a) be stored in an upright position and kept in a well ventilated area free from flammable material and electrical apparatus, and
- (b) have a securely fastened, approved valve protection cap, and be adequately secured by chains or other acceptable means to prevent it from being knocked over.

- (3) At any time that compressed gas cylinders are being transported, they shall be secured on a special carrier or container designed for the purpose, and unless the carrier or container is of a type intended for safely moving gas cylinders, the cylinders shall be fitted with securely fastened, approved valve protection caps.

At the time of the inspection a number of gas bottles were found to have no valve protection covers fitted and some were free standing.

The manager shall cause this situation to be corrected By October 17/13.

Fire Extinguisher

- 4.9.3 Every vehicle shall carry at least one fire extinguisher of adequate size and of the proper type.

Not all equipment had an adequate fire extinguisher on board. This deficiency will be corrected by October 17/13.

Vehicle Requirements 4.9.4

- (1) All rubber tired mobile equipment over 7000 kg gross vehicle weight shall have a minimum of two wheel chocks which shall be used whenever necessary.

During the inspection there were no wheel chocks found in or in use on the equipment.

The manager shall remedy this by October 17/13

all sides have placards.

valve protection in place extra tank secured.

upgraded extinguishers.

purchased and Being implement.

Date of Inspection

10/10/2013

Initials



(Inspector)

Initials

(Manager)

Report of Inspector of Mines Page 4 of 4

INSPECTION ORDERS

MANAGERS RESPONSE OF ACTION TAKEN

Logbook to be Maintained

6.19.2 The manager shall provide and maintain an effective logbook system for each unit of mobile equipment over 7000 kg gross vehicle weight where

- (a) the vehicle operator notes the operating condition prior to operating of the vehicle
- (b) note any unsafe conditions, and
- (c) a qualified person making repairs, notes any repairs made and if the vehicle is safe to operate

Although one logbook was found the information is inadequate. The manager will take the necessary steps to correct the lack of information and supply proper logbooks by October 31/13

Fuel & Lubricants 9.9.1

(1) Liquid hydrocarbon products shall be stored within a containment that minimizes the possibility of accidental discharge to the environment.

(2) Unless authorized by an Inspector, bulk liquid hydrocarbon products shall not be stored within 30 meters of a stream, lake or wetland

There were a number of areas found to be without containment and a lot of used and new oil containers present around the quonset shed area. There is evidence of hydrocarbon product on the ground. The manager shall have the whole area cleaned to an acceptable standard by November 1/13.

all equipment has log book completed.

all oils in containment areas ongoing clean up. Soil will be removed from area.

Date of Inspection

10/10/2013

Initials



(Inspector)

Initials

(Manager)



Ministry of
Energy and Mines

Ministry of Energy and Mines
Mining & Mineral Division
Report of Inspector of Mines
Reclamation and Permitting
(Issued pursuant to Section 15 of the *Mines Act*)

Inspection No.: 27557
File: 18070-02-09
Mine No.: 1500021
Emp/Cont: 0 / 0
Orders H&S: 0 RECL 2
Stop Work: 0

Name of Property Red Lake Quarry Permit No. Q-11-001
Location Kamloops
Owner, Manager Peter Aylen

Company Absorbent Products Ltd.
Address 724 E. Sarcee Street
Kamloops BC V2H 1E7

Persons Contacted Steve Gurney, Dave Bowers

Type of Mining INDUSTRIAL MINERALS - SURFACE
Date of Inspection 10/10/2013
Copies To

Written response is required from the Mine Manager within 15 days of receiving the report. In this document, Code means Health, Safety and Reclamation Code for Mines in British Columbia.

Inspection Report Text

INSPECTION ORDERS

This inspection was conducted on October 10/13 by Rick Adams, Inspector of Mines, and Sandy Gillies, Inspector of Mines, Mechanical. The following orders were issued as a result of the inspection, and apply to that portion of the mine property described as: the Bepple Pit; the Bepple property; parcel identifier 014-526-280; and/or, the south west $\frac{1}{4}$ of the south west $\frac{1}{4}$ of Section 12 Township 23 Range 21 west of the 6th Meridian Kamloops Division Yale District, and as shown outlined in yellow on the attached map.

SECTION :10.7.4 Land Use

The land surface shall be reclaimed to an end land use approved by the chief inspector, that considers previous and potential uses.

Pursuant to Section: 10.7.4 of the Code, and Special Conditions: 4. of the *Mines Act* permit, the land surface shall be reclaimed to an end land use of forested timber lands. This is required effective immediately, and ongoing, as land is progressively

MANAGERS RESPONSE OF ACTION TAKEN

Rick Adams, RPF
Inspector of Mines

Dated: 10/16/2013

Page 1

reclaimed.

SECTION :10.7.5 Capability

Excluding lands that are not to be reclaimed, the average land capability to be achieved on the remaining lands shall not be less than the average that existed prior to mining, unless the land capability is not consistent with the approved end land use.

Pursuant to Section: 10.7.5 of the Code, and Special Conditions: 4. of the *Mines Act* permit, the manager shall engage a Qualified Forest Professional to develop, and implement, a silviculture prescription to: reclaim the site to forested timber lands with native species of the same type, diversity, and forest productivity as existed prior to mining; and with planted tree seedling density sufficient to expect to produce commercially viable timber volumes at stand maturity. This is required effective immediately, and ongoing, as land is progressively reclaimed.



Rick Adams, RPF
Inspector of Mines

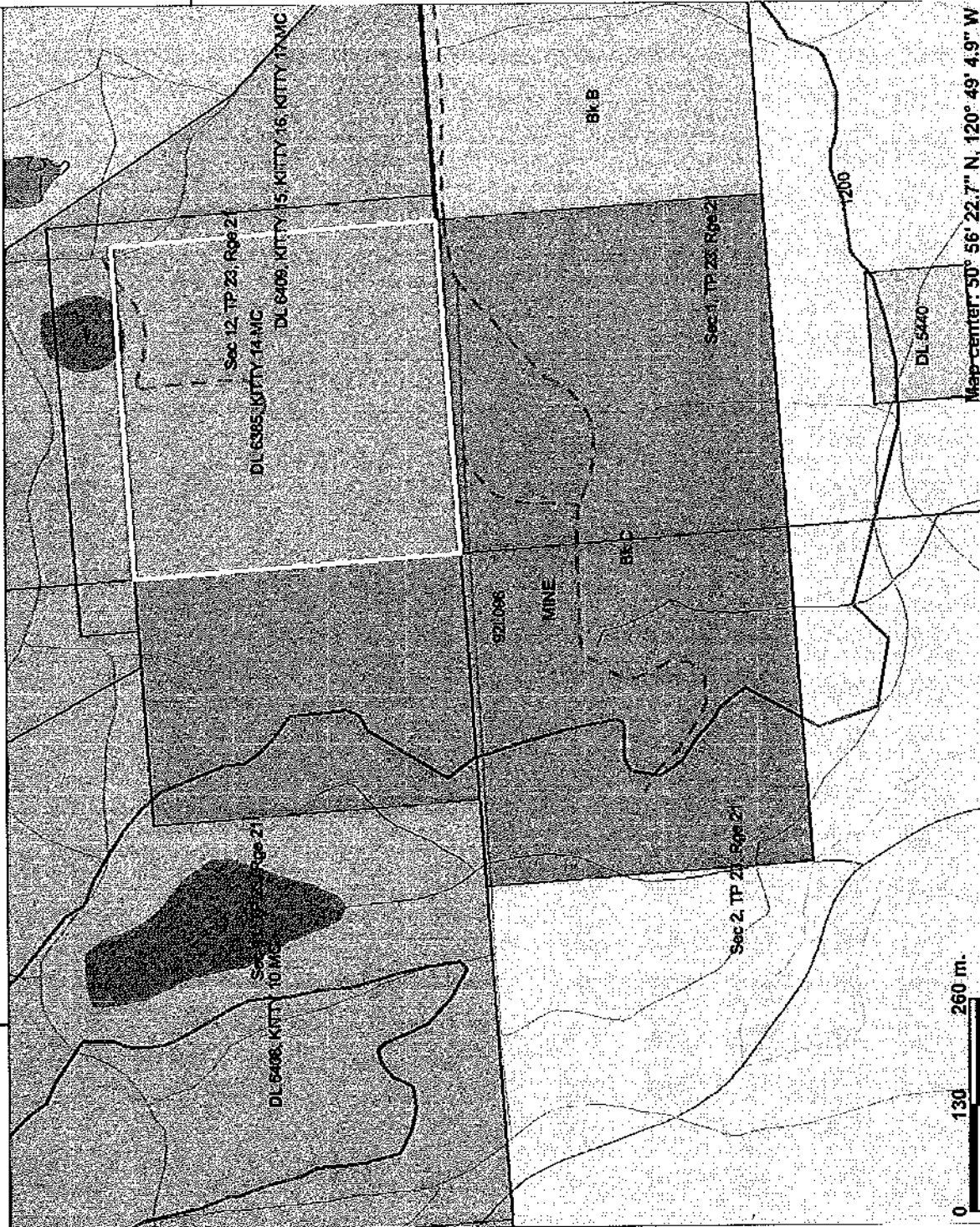
Dated: 10/16/2013

Page 2



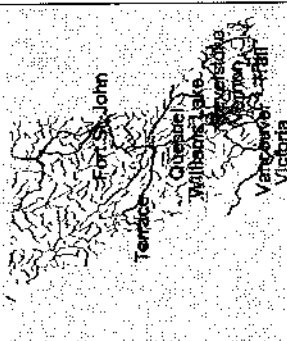
MineralTides
Online

Mineral Titles Online



0 130 260 m.

This map is a user generated static output from an Internet mapping site and is for general reference only. Data layers that appear on this map may or may not be accurate, current, or otherwise reliable. THIS MAP IS NOT TO BE USED FOR NAVIGATION.



Legend

- ☐ Indian Reserves
- ☐ National Parks
- ☐ Conservancy Areas
- ☐ Parks
- ☐ Federal Transfer Lands
- ☐ First Nations Treaty Related Lands
- ☐ First Nations Treaty Lands
- ☐ Integrated Cadastral Fabric
- ☐ Survey Parcels
- ☐ BCGS Grid
- ☐ Contours (TRIM)
- ☒ Contour - Index
- ☒ Contour - Index Indefinite
- ☒ Contour - Index Depression
- ☒ Contour - Index Depression Indefinite
- ☒ Contour - Intermediate
- ☒ Contour - Intermediate Indefinite
- ☒ Contour - Intermediate Depression
- ☒ Contour - Intermediate Depression Indefinite
- ☒ Areas of Exclusion
- ☒ Areas of Indefinite Contours
- ☒ Annotation (1:20K)
- ☒ Transportation - Points (TRIM)
- ☒ Helipad
- ☒ Transportation - Lines (TRIM)
- ☒ Airfield
- ☒ Airport
- ☒ Airstrip
- ☒ Airport Abandoned
- ☒ Ferry Route



Scale: 1:7 482

Spear, Ashley MEM:EX

From: Peter Aylen <paylen@absorbentproductsltd.com>
Sent: Wednesday, June 19, 2013 8:11 AM
To: Hupman, C Bruce EMNG:EX
Cc: 'Steve Gurney'; 'Lyndsey Cable'
Subject: FW: apl gate entrances att : peter aylen
Attachments: bepple pit enterence .jpg; absorbent products main gate .jpg; gate on crown to mine fence.jpg; 130611_003.jpg

Hi Bruce,

For your records, here are pictures or the various mine entrances showing the signage.

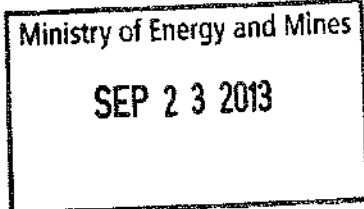
Peter Aylen

From: Michelle Lester [<mailto:mlester@absorbentproductsltd.com>]
Sent: Wednesday, June 12, 2013 8:36 AM
To: 'Peter Aylen'
Subject: FW: apl gate enterences att : peter aylen

These are from Dave.

Michelle Lester, Administrative Assistant/Sales Coordinator
mlester@absorbentproductsltd.com
724 East Sarcee Street, Kamloops, BC V2H 1E7
(250) 372-1600, EXT: 128, Fax: (250) 372-3777

From: Dave Bowers s.22
Sent: Tuesday, June 11, 2013 11:25 PM
To: info@absorbentproductsltd.com
Subject: apl gate enterences att : peter aylen



September 19, 2013

Al Hoffman
Chief Inspector of Mines
PO Box 9320 Stn Prov Govt
Victoria BC V8W 9N3

Red Lake Quarry, Mine # 1500021, Mines Act Permit Q-15-006, SRB Order 0016A

Dear Sir:

This is a request for the mining permit Q-15-006, currently held by Absorbent Products Ltd.(APL) to be amended to reflect that the reclamation of my property will be for a land use of forest. The appropriate vegetation used shall be native species of the same type and diversity as was present on the property before being occupied for mining.

Neither the Ministry nor APL considered allowing me input on the reclamation when the permit covering my property was first applied for. I have never been consulted about the reclamation of my property by either the Ministry or the mining company in any meaningful way even though the responsibility for consultation was there.

I have repeatedly indicated to APL that I expect my property to be reclaimed for a land use of forest and the appropriate vegetation used shall be native species. APL insists they will reclaim my property as pasture because the mining permit allows them a choice of either forest or pasture/grazing.

Because of my prior rights, the right to determine the land use lies with the holder of the surface rights and not the holder of the mineral rights or the mining permit. I have never agreed to have my property reclaimed for grazing or pasture.

My property was forested prior to the occupation of my land by APL for mining purposes so why isn't it required to be returned to me as the same forest?

Sincerely,

s.22

CC: Honourable Bill Bennett, Minister of Energy, Mines and Natural Gas
Peter Aylen, Absorbent Products Ltd., Kamloops



February 2, 2015

File:14675-20/1500021

Steve Gurney
Absorbent Products Ltd.
724 Sarcee Street East
Kamloops, BC V2H 1E7

Dear Steve Gurney:

Re: Mines Act Permit Q-15-006
Property: Red Lake Quarry

A review of your file it has been determined that your permit requires updated information in order to remain in compliance with the Health, Safety and Reclamation Code for Mines in British Columbia.

It is a requirement that the following information be provided to our office by May 31, 2015:

- 1) A revised Notice of Work including a property map showing structures, roads and working areas. The detailed description of the operation shall be included describing the present plans, proposed activity over the next 5 years and the reclamation to date.
- 2) An updated Mine Plan complete with cross sections pursuant to part 6.8.1 of the Code
- 3) An Mine Emergency Response Plan (MERP) pursuant to part 3.7.1 of the Code

Enclosed is a copy of our MERP guidelines. The Notice of Work application must be submitted online to Front Counter BC and can be found at the following website:
<http://www.frontcounterbc.ca/guides/mines/notice-of-work/overview/> .

Sincerely,

Allan Ludwig
Inspector of Mines

Encl. MERP guidelines