

Stand Alone Report 1

Emergency Response and Contingency Plan

Rare Element Resources Inc. Bear Lodge Project Emergency Response and Contingency Plan

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**Rare Element Resources Inc.
Bear Lodge Project
Emergency Response and Contingency Plan**

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Rare Element Resources Inc. Bear Lodge Project Emergency Response and Contingency Plan

Section 1.0 - Introduction

The Emergency Response and Contingency Plan (ERCP) has been developed for the Rare Element Resources (RER) Bear Lodge Project to provide employees and managers with specific instructions that will allow them to respond quickly and efficiently to reasonably foreseeable emergencies. This ERCP was developed using recognized and accepted methods and practices, and will undergo regular review to update and reflect on-going construction and operations at Bear Lodge.

The Bear Lodge Project consists of the Bull Hill Mine located approximately 12 miles north of Sundance, Wyoming in central Crook County, Wyoming and the Upton Plant Site (Upton Facility) located 40 miles south of the Bull Hill Mine approximately 2 miles northwest of the town of Upton, Wyoming in north-central Weston County. The Bull Hill mine encompasses the mineable pit, waste rock disposal facility, and a Physical Upgrade (PUG) plant with ancillary facilities. The Upton Facility consists of a hydrometallurgical processing (hydromet) plant and tailings storage facility (TSF). The Bull Hill Mine and ancillary facilities are located on both private land and U.S. Forest Service (USFS) Land within the Black Hills National Forest (BHNF) land. The Upton Facility is located on private land.

1.1 Authority and Management Responsibilities for Response

RER will assemble a team of qualified and specialized staff to fill the key management roles for the project. Certain members of the management team will have direct responsibilities for responding to on-site emergencies. The responsibilities of key management personnel are summarized for each position in this section. The discussion is meant to provide an overview of key responsibilities and is not a complete list of responsibilities for each position.

1.1.1 General Manager and Plant Manager

The General Manager is responsible for oversight of construction, operations and closure activities at the Bear Lodge Project. The General Manager is also responsible for helping to coordinate the occupational health and safety programs along with the Environmental, Health and Safety Officer (EHSO) including employee training and specialty training of the Emergency Response Team (ERT). In addition, the General Manager is responsible for communications with the public, including notification of incidents and disclosure of important information.

To assist the General Manager, the Upton Plant Manager and the EHSO are responsible for monitoring for potential emergencies that may occur at or near the project facilities. These managers are also responsible for documenting and reporting accidental spills or releases, and accidents or injuries to workers.

1.1.2 Upton Plant Manager

The Upton Plant Manager (Plant Manager) is responsible for oversight of construction, operations and closure activities at the Upton Facility. The Plant Manager will provide support to the General Manager in developing and maintaining the occupational health and safety programs.

The Plant Manager will be responsible for monitoring for potential emergencies that may occur at or near the Upton Facility. The Plant Manager will also be responsible for documenting and reporting accidental spills or releases, and accidents or injuries to workers at the Upton Facility.

1.1.3 Environmental, Health and Safety Officer

The EHSO will serve as the Project emergency coordinator in the event of an emergency. The EHSO is responsible for the development and implementation of the ERCP. This person will also assure that the plan is periodically updated in coordination with the Environmental, Health, and Safety (EH&S) Director to address changes in site conditions or management, and improvements in emergency response procedures and techniques. In addition, this individual will also be responsible for the training of first responders in emergency procedures (what to do and how to do it) and will be thoroughly familiar with all aspects of the emergency response program.

The EHSO is responsible for the disposition of materials and wastes that may be accidentally released and the cleanup and proper disposal of spilled materials. They are also responsible for the occupational health and safety programs including employee training and specialty training of the ERT. The EHSO is responsible for communications with the public, including notification of incidents and disclosure of important information.

Specific responsibilities of the EHSO include, but are not limited to the following:

- Prepare a list of emergency contacts
- Maintain the inventory of emergency response equipment and supplies
- Arrange for the replacement of used or obsolete emergency supplies and equipment
- Organize and train the ERT
- Oversee first response programs
- Inspect and maintain fire extinguishers
- Evaluate inclement weather conditions (fire, wind, lightning, snow, rain) to ensure that field operations can be conducted safely
- Maintain records on emergencies or fatalities
- Maintain records on spills, leaks, or ruptures
- Oversee spill clean-up and disposal programs
- Report to regulatory agencies and stakeholders

The EHSO will also interact with the public to:

- Provide information on project hazards and emergency response programs
- Brief the public and employee relatives on emergencies
- Arrange for accommodations for members of the family in the event of extreme emergencies

1.1.4 Emergency Response Teams

The EHSO is responsible for recruiting and training the ERTs for the Bull Hill Mine and Upton Facility. The ERTs will be comprised of site employees specially trained to assist in the case of an emergency. Specifically, the ERT personnel will be trained in appropriate procedures to:

- Respond to emergencies involving fires or explosions
- Respond to emergencies involving natural disasters

- Respond to emergencies involving injuries or fatalities
- Train on-site staff in safety and emergency response procedures
- Control and mitigate spills or other accidental releases

The ERTs will receive training in the use of self-contained breathing apparatus (SCBA) in the event that this level of protection is required to assist with an emergency.

1.1.5 Supervisor Responsibilities

On-site line supervisors will each be responsible for identifying potential safety issues and for coordinating the response to emergencies in their work areas. They will be responsible for notifying the appropriate personnel in the event of an emergency. Supervisors will help monitor for accidental spills and releases, and fire and other natural disasters that may occur in or near their respective facilities. Supervisors will also be responsible for documenting and reporting accidental spills, releases, accidents or incidents in areas under their direct supervision.

1.1.6 Radiation Safety Officer

The Radiation Safety Officer (RSO) is responsible for suspending any site activity which threatens the health and/or safety of site workers, off-site people, or the local environment. The RSO will be stationed at the Upton Facility due to the production of radionuclides at this facility. The RSO will be responsible for documenting and reporting accidental spills or releases of radioactive material.

1.1.7 Bull Hill Mine

Table 1.1 identifies the parties that will be responsible for emergency response, control and notification should any emergencies occur during construction, operation and closure of the Bull Hill Mine.

**Table 1.1
Bull Hill Mine Emergency Notification Duties**

Personnel	Duties
<u>Emergency Observer</u>	<ul style="list-style-type: none"> • Immediately contact either the primary or secondary contact listed below to report detail of the emergency • Follow Emergency Response and/or Spill Containment procedures outlined in the ERCP
<u>Primary Contact</u> General Manager	<ul style="list-style-type: none"> • Immediately contact the EHSO • Assess the emergency, assemble the ERT and develop emergency response plan
<u>Secondary Contacts</u> EHSO Mine Superintendent Process Superintendent Shift Foreman	<ul style="list-style-type: none"> • In communication with the primary contact, will fulfill the duties above • Assess the emergency, assemble the ERT and develop emergency response plan • Initiate emergency services if needed • Ensure that all personnel are safe
<u>ERT</u> General Manager EHSO Process Superintendent Shift Foreman	<ul style="list-style-type: none"> • Provide equipment, manpower and resources to respond to emergency
<u>Regulatory Notification</u> General Manager EH&S Director EHSO	<ul style="list-style-type: none"> • Coordinate reporting of accidents, injuries, or fires to regulatory agencies • File spill report to appropriate regulatory agencies within prescribed amount of time

1.1.8 Upton Facility

Table 1.2 identifies the parties that will be responsible for emergency response, control and notification should any emergencies occur during construction, operation and closure of the Upton Facility.

Table 1.2
Upton Facility Emergency Notification Duties

Personnel	Duties
<u>Emergency Observer</u>	<ul style="list-style-type: none">• Immediately contact either the primary or secondary contact listed below to report detail of the emergency• Follow Emergency Response and/or Spill Containment procedures outlined in the ERCP
<u>Primary Contact</u> Plant Manager	<ul style="list-style-type: none">• Immediately contact the General Manager or EHSO• Assess the emergency, assemble the ERT and develop emergency response plan
<u>Secondary Contacts</u> General Manager EHSO Process Superintendent Shift Foreman	<ul style="list-style-type: none">• In communication with the primary contact, will fulfill the duties above• Assess the emergency, assemble the ERT and develop emergency response plan• Initiate emergency services if needed• Ensure that all personnel are safe
<u>ERT</u> Plant Manager EHSO Process Superintendent Shift Foreman	<ul style="list-style-type: none">• Provide equipment, manpower and resources to respond to emergency
<u>Regulatory Notification</u> Plant Manager General Manager EH&S Director EHSO	<ul style="list-style-type: none">• Coordinate reporting of accidents, injuries, or fires to regulatory agencies• File spill report to appropriate regulatory agencies within prescribed amount of time

1.2 Contact List

The EHSO will prepare a list of contacts to be included in the ERCP. Emergency contact information will be contained in the front of the ERCP so that contact information can be quickly found in the case of an emergency. Emergency contact information and procedures will also be posted in prominent places in the Bull Hill Mine and Upton Facilities. The emergency contact information will include names and detailed contact information for the following:

- Key management personnel
- ERT personnel
- Medical professionals
 - Hospitals
 - Fire Departments
- Contractors or local residents with response equipment that may be needed to supplement the mine fleet in the event of an emergency
- Appropriate Wyoming regulatory authorities

A security, firefighting and first aid facility will be constructed at the Bull Hill Mine to provide first response medical services for on-site fire and medical emergencies at the mine. This building will house the

security office and the safety training room in one section and the firefighting and ambulance base including a first aid center in the other section. Prior to the initiation of operations, a map will be prepared to show the locations of first aid stations, emergency equipment, and lists of individual emergency contacts.

A security, firefighting and first aid facility will be constructed at the Upton Facility to provide first response medical services for on-site fire and medical emergencies at Upton. Prior to construction, local first responder resources will be assessed for potential emergency response coordination and agreements.

Section 2.0 - Communications

The internal communications system will be used to alert workers to danger, convey safety information, and maintain site control. Hand held radios set to a predetermined channel each day will be used when work teams are working away from the main communications system. The internal system will consist of alarms or short signals that can easily be conveyed by audible signals. Training on the internal communications system will be provided to all employees as part of their employee orientation program.

2.1 Communications During an Emergency

Effective communication systems are important to successful emergency response. The pre-established chain of command and protocols will enable management and employees to quickly respond to emergencies.

During an emergency, the Security Gate personnel at the Bull Hill Mine or Upton Facility will be contacted immediately. Information will be transmitted from the Security Gate to the rest of the site via the radio system. The Security Gate will be staffed by security personnel and will be equipped to handle all radio and telecommunications in the case of an emergency. Both sites will also be equipped with phones that are capable of direct communication at all times.

In the event of an emergency, there will be prompt notification of appropriate individuals. Such individuals to be notified (as needed) will include:

- General Manager/Plant Manager
- EHSO
- Emergency Response Team
- Other Line Supervisors
- Process Superintendent
- Mine Superintendent
- Other managers
- RER Executive Management (Chief Operating Officer, ES&H Director)
- State and Federal Governmental Agencies
- External Affairs Manager
- Community Leaders
- Employee Family Members

In the event that there is a need for the rapid notification of local communities, the first responder will immediately contact the Security Gate personnel. The Security Gate personnel will immediately contact the management team. This will trigger the appropriate emergency notification system that has been developed by the EHSO. An announcement will also be made over all radio channels stating which channel will be designated as the channel for the emergency and that all non-emergency communications will be discontinued. The notification process will be documented in writing to include information such as date, time, location, nature of the event, and actions taken to address the situation.

2.2 Communications with the Public

The EHSO, in coordination with the External Affairs Manager, will be responsible for all on-site and local communications with the public and local first responders. As required, meetings will be held to

disseminate information related to on-site emergencies. Local residents, community leaders, other stakeholders, and non-governmental agencies will be contacted as appropriate and invited to attend these meetings. The EHSO will coordinate with the External Affairs Manager to brief him/her on the facts of the incident and what pertinent information should be released to the public, government officials, and other interested stakeholders. The External Affairs Manager will be responsible for informing the appropriate parties at the national level.

RER will also establish waiting and briefing areas for family/relatives of those involved in serious accidents. Food and a sitting/sleeping area will also be provided to members of the family and relatives, as appropriate.

In providing information to the public, the EHSO and the External Affairs Manager will provide information on the following:

- Description of the event
- Identification of the population that might be affected
- Description of any injuries and disposition of those involved in the accident
- Identification of any existing hazards
- Description of precautions taken to limit future risks
- Identification of contaminated water sources (if any)
- Description of mitigation measures that are proposed or have been taken to correct the problem
- Contact information

Section 3.0 - Unplanned Spills and Releases

RER will file a Spill Prevention, Control and Countermeasure (SPCC) Plan with the Wyoming Department of Environmental Quality (WDEQ), Solid and Hazardous Waste Division. The SPCC Plan will include oil spill prevention, preparedness, and response to prevent oil discharges as well as other contaminants. When completed, the SPCC plan will be appended to the Emergency Response and Contingency Plan. General spill response measures are contained in the following sections.

3.1 General Emergency Response Procedures

In the case of an emergency at the Bull Hill Mine or Upton Facility, several general emergency response procedures should be followed prior to any other activities.

In the event that a leak, spill, rupture, or other accident associated with fuel, oil, or chemical storage areas, the response should include the following general procedures:

- Avoid danger to people (i.e., stop working, shut off power sources and any moving machinery and equipment, extinguish smoking materials or other spark or flame-making devices, and alert others in the area of danger).
- Move people upwind of the emergency scene.
- Identify the product that has been spilled, as well as immediate potential hazards (e.g., possible contact of the spilled material with equipment, other chemicals, or waters of the State).
- If it can be done in a safe manner, prevent the spill from entering waterways.
- Assess spill volume and characteristics.
- Notify the Security Gate personnel with as much information as possible.
- Arrange for a safe and timely cleanup of spilled material by contacting the EHSO.

Depending upon the nature of the spilled material, the air quality in the area of the spill could be unsuitable for breathing. Only trained personnel should enter areas that are not well ventilated. Trained personnel should only enter these areas with appropriate respiratory protection and should always employ the “buddy system” that will provide assistance in the case of an emergency.

3.1.1 Upton Facility

Hazardous substances such as hydrochloric acid and radionuclides will be used and stored at the Upton Plant. Additional regulatory emergency response requirements such as local evacuation procedures and planning for worst case scenarios may be applicable to this site if regulatory thresholds are exceeded. An analysis of the site and potentially-regulated hazardous substances will be conducted prior to plant construction which may result in an amendment to this plan and/or a standalone plan for the Upton Facility. The RSO will be responsible for management of a spill of radioactive material.

3.2 Emergency Response Checklist

An emergency response checklist to be used by RER personnel will be developed for the Bull Hill Mine and Upton Facility based on guidelines developed by the United States Department of Labor, Mine Safety and Health Administration (MSHA) and the Occupational Safety and Health Administration (OSHA).

The emergency response checklist is organized according to the following categories:

- Notification
- Shutdown operation
- Security and site monitoring
- Command Center
- Communications
- Medical arrangements
- Acquisition of equipment, materials, and services
- Evacuation
- Information

3.3 Reporting Procedures

The EHSO is responsible, in conjunction with the General Manager, Plant Manager, and RSO, for maintaining records associated with spills, leaks, ruptures, or other releases. Such records shall document:

- Person or people involved
- Date, time, and location of discharge
- Description of the situation and site conditions
- Identification and estimated volume of discharged solution
- Actions used to control the extent and severity of the discharge
- Final disposition of discharged solutions
- Documentation of clean-up actions taken and final disposition of contaminated material
- Description of any environmental effects from the discharge

All records of spills will be documented using the Spill Report Form (Appendix A). Completed forms will be submitted to the EHSO for filing. Records will be periodically reviewed to verify that proper corrective actions have been taken, including remediation of contaminated areas and replacement, repair, or maintenance to storage systems. A more detailed description of the reporting requirements to the Wyoming regulatory officials is outlined in Section 8.

3.4 Preparedness

A chemical inventory and map showing storage locations will be prepared to identify all storage tanks located at the Bull Hill Mine and Upton Facility. The inventory will include the following information:

- Locations of storage tanks
- Type/make of the tank
- Tank storage capacity
- Product contained in the tank
- Material Safety Data Sheet (MSDS) of tank contents

All above-ground storage tanks will be constructed with surrounding berms to provide adequate secondary containment capacity. Inspections will be performed as part of the normal supervisor's shift

reports. Such inspection will occur on at least a monthly basis to evaluate the integrity of tanks, piping and containment berms for potential leaks.

Below-ground storage tanks will be constructed to resist corrosion and to limit the potential for accidental spills. All below-ground tanks will be equipped with overfill/spill buckets on the fill line, annual leak testing will be performed on all non-consumptive tanks, and volumes will be reconciled regularly in both consumptive and non-consumptive tanks.

3.4.1 Fuel and Bulk Oil Storage Facilities

The EHSO will be responsible for the fuel and oil storage facilities. In addition, the EHSO will assign personnel to inspect the fuel and oil storage facilities as part of their normal duties of dispensing and tracking fuel consumption. Above-ground storage tanks will be visually inspected for leaks, damage, or unusual conditions. The EHSO will keep an inventory of inputs and outputs to each tank, and will reconcile the balance on a monthly basis to detect any fuel or oil losses.

3.5 Spill Prevention

Spill prevention requires careful work habits and job awareness. Proper employee training will ensure that all work activities are in accordance with the engineering design and established health and safety guidelines.

Regularly scheduled maintenance and monitoring will detect potential problems with the water management system and help maintain normal operating conditions. All leaks, damages, or unusual conditions will be immediately reported and repairs will be made promptly. Routine monitoring will enable early detection of any accidental releases.

3.5.1 Tanks and Bins

Tanks and bins that contain chemicals, fuels, oils, or gasoline located in the processing plant, fuel storage areas and laboratories will be visually inspected on a regular basis. Any signs of wear or leaks will be immediately reported to the Process Superintendent who will make sure that the necessary repairs are made in a timely manner. In addition, tanks and bins will include secondary containment of sufficient volume to contain 110 percent of the largest vessel. All tanks and bins will be located so that they are easily visible to mobile equipment operators. During filling, best management practices will be mandatory to reduce the occurrence of accidental spills. All employees who handle chemicals will be trained in the proper usage and storage procedures prior to beginning employment. Good housekeeping procedures will be mandatory for all employees who handle or use chemicals and fuels.

3.6 Spill Containment

The main focus of spill containment is to reduce potential risks to human health and the environment by controlling spills in a timely manner. In the event of a spill, the ERT will be immediately sent to the spill location.

The spill containment contingency plan will include the following steps and guidelines:

- Approach with caution. The area should be evacuated and isolated except for the ERT.
- Identify Hazards. Evaluate all available information and consult the recommended guide to reduce immediate risks.
- Situation Assessment. The following questions should be considered:
 - Is the emergency related to a spill, or leak?
 - What are the weather conditions?

- Who/what is at risk - people, property, or the environment?
 - What actions should be taken?
 - What resources (human and equipment) are required?
- Spill Response. The following items should be considered:
 - Locate chemicals
 - Equipment deployment
 - Chemical removal
 - Temporary storage
 - Mechanical recovery for disposal or re-processing

All spills will be documented and include a description of the spill and the corrective action taken. A follow-up report will also be generated to make recommendations on future preventative measures. The lesson learned from the follow-up report will be integrated into operation and emergency response plans.

Section 4.0 - Fires

The general fire hazards, prevention and response procedures are summarized below, which apply to both the Bull Hill Mine and Upton Facility, except where noted. The Upton Facility will likely be required to meet local fire codes. Therefore, response procedures for this facility will require updating prior to plant construction.

4.1 Potential Fire Hazards and Ignition Sources

Potential fire hazards and potential ignition sources at the Bull Hill Mine and Upton Facility include but are not limited to:

- Explosives
- Air conditioning gases
- Solvents
- Welding and cutting supplies
- Paints and thinners
- Electronics equipment
- Lab wastes

Potential fuel source hazards at the Bull Hill Mine and Upton Facility include but are not limited to:

- Fuels, oils, greases, hydraulic fluids, antifreeze, and other lubricants
- Vehicle fluids
- Trash, brush, and dry grass surrounding facilities
- Trees and other natural vegetation

A list of the heat-producing equipment that may be anticipated to be used at the Bull Hill Mine and Upton Facility is presented below, but is not limited to:

- Generators
- Catalytic converters
- Welding equipment
- Ovens
- Boilers
- Stoves
- Heat exchangers
- Burners

4.2 Fire Prevention

The Shift Foreman and Line Supervisors will be responsible for maintaining potential fire hazards, ignition sources and heat producing equipment to prevent accidental ignition of combustible materials. Storage, handling and control procedures for fuel sources will be used to reduce the risk of fires at the Bull Hill

Mine and Upton Facility. Fuels will be safely handled during delivery, labeled properly to prevent misuse, and stored properly.

Heat-producing equipment will be properly housed, maintained and cleaned, and will not be operated in open brush areas or near combustible materials. Burners will be capable of emergency shut-off in the event of an emergency.

Other measures will be taken to prevent fires around the site. Employees will only be permitted to smoke in designated areas on site. "No smoking" signs will be placed in the areas surrounding the explosives magazines to notify employees and visitors of the Project where smoking is prohibited.

On USFS lands (Bull Hill Mine), felled trees and slash generated during preparation for road and facility construction will be handled following direction from the USFS. On private lands, the Wyoming Division of Forestry guidance will be followed. Slash may be used for sediment control, revegetation/mulch, and/or stockpiled.

During elevated fire danger, RER will impose restrictions at the mine in accordance with Order # BKF-2012-118 regarding Stage II fire and smoking restrictions in the Black Hills National Forest.

4.3 Response Procedures

4.3.1 Major Fire or Explosion

In the event of a major fire or explosion, the following procedure should be followed:

- Assess the location and severity of the situation. Do not take health or safety risks by entering unstable or active fire areas.
- Extinguish the fire if it can be accomplished quickly and without being exposed to potential hazards; otherwise, call on the ERT for assistance.
- Activate the emergency warning system.
- Evacuate the area and direct workers to the designated assembly area.
- Restrict access to the area.
- Notify the General Manager, Plant Manager, EHSO and ERT according to established protocols.
- Report any unplanned ignitions or explosions, or non-extinguished fires (burning for 30 minutes or longer) to the Mine Safety and Health Administration (MSHA) (1-800-746-1553) as discussed in Section 8.2.

The emergency response procedure will be implemented upon detection of a fire. Firefighting equipment and an emergency response vehicle equipped with firefighting equipment will be sent to the area immediately.

The incidence of fires or explosions is expected to be rare. However, smoke detection equipment should be considered in higher risk facilities and areas heavily used by personnel such as common areas and offices. Suitably trained employees will perform periodic inspections of higher risk areas and equipment to limit the potential for fire hazards.

4.3.1.1 Bull Hill Mine

Bulk fire protection at the Bull Hill Mine will be provided from the water distribution system at the PUG Plant. A minimum of 100,000 gallons will be maintained in the raw water/fire water tank to provide sufficient fire suppression needs. This system will be connected to a hydrant distribution system for firefighting in the administration area. Firefighting equipment will be maintained on site. In higher risk

areas such as control rooms, mineral processing areas, and mobile equipment, chemical and halon fire extinguishers will be placed in convenient locations.

4.3.1.2 Upton Facility

Bulk fire protection at the Upton Facility will be provided from the fire water network which will be fed directly from the city water supply. Firefighting equipment will be maintained on site. In higher risk areas such as control rooms, mineral processing areas, and mobile equipment, chemical fire extinguishers will be placed in convenient locations.

4.3.2 Responsible Persons

The Shift Foreman and Line Supervisors will also be specially trained to use and maintain fire prevention and control equipment in the event that fires occur in their specific working areas.

Additional staff will be, at a minimum, trained to operate fire extinguishers at mine facilities in order to quickly extinguish small on-site fires if it can be accomplished quickly and without being exposed to potential hazards.

4.3.2.1 Bull Hill Mine

Key personnel at the Bull Hill Mine who will be responsible for using and maintaining fire prevention and control equipment include the following:

- PUG Plant and Mine Superintendents
- Bull Hill Emergency Response Team
- Environmental Health and Safety Officer
- Shift Foreman
- Line Supervisors
- Equipment Operators

4.3.2.2 Upton Facility

Key personnel at the Upton Facility who will be responsible for using and maintaining fire prevention and control equipment include the following:

- General Manager
- Task Manager
- Upton Emergency Response Team
- Environmental Health and Safety Officer
- Shift Foreman
- Line Supervisors
- Equipment Operators

4.3.3 Fire Emergency Escape and Evacuation Routes

In the event of a fire, workers will be required to evacuate and reassemble at a safe refuge or assembly location. The evacuation route and assembly locations are provided below. Alternate routes and assembly locations will be provided by the Field Supervisor or EHSO in case the fire is located in the designated routes/assembly locations.

It is important that during or following an emergency fire evacuation, employees do not simply leave the area without reporting to the safe refuge. The EHSO will account for all employees at the designated assembly location.

4.3.3.1 Bull Hill Mine

At the Bull Hill Mine, field personnel will be required to report to the security office, firefighting and first aid building housing security and safety training rooms located on site or an alternate designated area selected by the Field Supervisor or EHSO. Refer to Figure 4.1 for the location of the designated safe refuge.

4.3.3.2 Upton Facility

At the Upton site, field personnel will be required to report to the entrance into the Upton municipal airport located .45 miles west of Highway 116 and Buffalo Creek Rd or an alternate designated area selected by the Field Supervisor or EHSO. Refer to Figure 4.2 for the location of the designated safe refuge.

4.3.4 Water Resources

4.3.4.1 Bull Hill Mine

Water resources for the Bull Hill Mine include the following:

- On-site production well (MW-16)
- Water storage tank capable of storing 135,670 gallons
- Process water tank capable of storing 30,300 gallons
- Packaged potable water treatment system

Figure 4.1 provides the location of these water resources.

4.3.4.2 Upton Facility

The Upton facility water supply will be provided by a connection to the Upton, Wyoming, municipal water network. A process water tank of capable of storing 77,700 gallons will be installed at the Hydromet Plant to supply water to the various unit operations. The tank will be filled by the condensate from the Hydrochloric Acid Regeneration Unit, reclaim water from the TSF, and by fresh water from the City of Upton. Gland seal water, potable water and fire water network will be fed directly from the city water supply (RER, 2014).

These water resources can be used in the event of a fire to aid in firefighting efforts. Figure 4.2 provides the location of these water resources.

Section 5.0 - Extreme Climatic Events

After review of the Multi-Hazard Mitigation Plan for Crook County, Wyoming and the communities of Hulett, Moorcroft, Pine Haven, and Sundance (Beck, 2013) the following severe weather hazards were listed with high or medium probability of occurrence based on frequency and severity;

- Summer Storms
 - Severe Thunderstorms and Lightning
 - Hail Storms
 - Flooding (medium probability)
 - Winter Storms and Blizzards
- Tornadoes

The following subsections describe extreme climatic events most likely to occur at the Bull Hill Mine and the Upton Facility, preventative measures, and response and aftermath processes.

5.1 Bull Hill Mine

The Bull Hill Mine is relatively isolated therefore the prevention and response procedures consider a relatively slow response time from external support services following an extreme weather event. At the Bull Hill Mine the extreme climatic events likely to occur include:

- Summer Storms
 - Severe Thunderstorms and Lightning
 - Hail Storms
 - Flooding
- Winter Storms and Blizzards
- Tornadoes

5.1.1 Preventative Measures

The permanent structures at the mine site will be constructed of masonry, wood, and metal, or a combination of these materials, and have no openings except for entrances, exits, and ventilation. These materials can withstand most of the summer and winter storm events identified above. Prior to high wind events, objects outside of the permanent structures will be secured or moved inside.

Weather forecasts will be monitored by the EHSO and authority will be given to the EHSO and General Manager to shut-down all operations in advance of extreme weather, if possible. Radio contact will be maintained during the event until the all-clear is sounded. Staff will be trained on the response procedures described below.

A survival kit with water, food, heat sources, candles and matches, blankets, shovels, flashlights, first aid kit, and other supplies will be kept in the warehouse building in case employees become stranded for up to 24-hours onsite due to weather. Vehicles which may be stranded on roads-incoming and outgoing during storm events should be equipped with similar survival equipment for use during winter storms.

To prevent flooding at the mine site, diversions and channels will be designed and constructed to withstand the 100-year frequency, 6-hour storm duration (Golder, 2014).

5.1.2 Response and Aftermath Processes

Summer Storms and Flooding: After the shut-down order is given and all equipment has ceased operating, personnel will take shelter inside the core of the permanent structures or in their equipment cabs until the all-clear signal is given by the EHSO. If employees are stranded in their vehicles during a lightning storm (the rubber tires will provide grounding) they should park a safe distance from tall objects, maintain communication via wireless radio, ensure windows are rolled up, and turn engine off.

Winter Storms and Blizzards: Personnel will gather in the warehouse building, use the survival kits, and wait out the storm until a plow or equipment can clear a path out of the site. For employees stranded in their vehicles during a winter storm, they should maintain communication via wireless radio, ensure windows are rolled up (may open a window on the side away from the wind for fresh air), run engine only 10 min per hour, ensure tail pipe is not blocked, and use the survival kit as needed until they can be rescued.

Tornadoes: After the shut-down order is given and all equipment has ceased operating, personnel will take shelter inside the core of the permanent structures or in their equipment cab to wait out the tornado until the all-clear signal is given.

After the extreme weather event has passed and before the all-clear signal is given the site should be checked for dangers such as washed out roads, scattered debris, ice build-up, and downed live power lines. After all immediate danger has passed the all clear-signal will be given by the EHSO and personnel may resume work or leave the property.

5.2 Upton Facility

The Upton Facility is located in Weston County in an industrial area surrounded by other business, railroad tracks, highways, and power lines. The prevention and response procedures consider a relatively fast response time from external support services following an extreme weather event. At the Upton Facility the extreme climatic events likely to occur include:

- Summer Storms
 - Severe Thunderstorms and Lightning
 - Hail Storms
 - Flooding
- Winter Storms and Blizzards
- Tornadoes

5.2.1 Preventative Measures

The permanent structures at the Upton site will be constructed of masonry, wood, and metal, or a combination of these materials, and have no openings except for entrances, exits, and ventilation. These materials can withstand most of the summer and winter storm events identified above. Prior to high wind events objects outside of the permanent structures will be secured or moved inside.

Weather forecasts will be monitored by the EHSO and authority will be given to the EHSO and or Shift Manger/Plant Manager to shut-down all operations in advance of extreme weather, if possible. Radio contact will be maintained during the event until the all-clear is sounded. Staff will be trained on the response procedures described below.

A survival kit with water, food, heat sources, candles and matches, blankets, shovels, flashlights, first aid kit, and other supplies will be kept in the safety training room in case of employees being stranded for up

to 24-hours onsite due to weather. Vehicles which may be stranded on roads-incoming and outgoing during storm events should be equipped with similar survival equipment for use during winter storms.

To prevent flooding of the TSF, diversions and channels will be designed and constructed to convey water around the facility. A surface diversion channel along the west side of the TSF will prevent surface water from running into the facility during the design storm event and will divert the storm water north and south into the rip rap channels which convey the water into natural drainages.

5.2.2 Response and Aftermath Processes

Summer Storms and Flooding: After the shut-down order is given and all equipment has ceased operating, personnel will take shelter inside the core of the permanent structures or in their equipment cabs until the all-clear signal is given by the EHSO/Shift Manger/Plant Manager. If employees are stranded in their vehicles during a lightning storm (the rubber tires will provide grounding) they should park a safe distance from tall objects, maintain communication via wireless radio, ensure windows are rolled up, and turn engine off.

Winter Storms and Blizzards: Personnel will gather in the core of the safety training rooms, use the survival kits, and wait out the storm until a plow or equipment can clear a path out of the site. For employees stranded in their vehicles during a winter storm, they should maintain communication via wireless radio, ensure windows are rolled up (may open a window on the side away from the wind for fresh air), run engine only 10 min per hour, ensure tail pipe is not blocked, and use the survival kit as needed until they can be rescued.

Tornadoes: After the shut-down order is given and all equipment has ceased operating, personnel will take shelter inside the core of the permanent structures or in their equipment cab to wait out the tornado until the all-clear signal is given.

After the extreme weather event has passed and before the all-clear signal is given the site should be checked for dangers such as washed out roads, scattered debris, ice build-up, and downed live power lines. After all immediate danger has passed the all clear-signal will be given by the EHSO/Shift Manger/Plant Manager and personnel may resume work or leave the property.

Section 6.0 - Medical Emergencies

The ERTs at the Bull Hill Mine and Upton Facility will respond to medical emergencies. The ERTs will be trained as first responders to perform emergency first aid treatments, including cardiopulmonary resuscitation (CPR).

6.1 Medical Facilities

6.1.1 Bull Hill Mine

The ERT will be trained in transferring accident victims from Bull Hill Mine to Crook County Memorial Hospital, located at 713 Oak St., Sundance, Wyoming; or depending on the circumstances, to the Campbell County Memorial Hospital, located at 501 S. Burma Ave., Gillette, Wyoming (approximately 70 miles from the mine).

6.1.2 Upton Facility

The ERT will be trained in transferring accident victims from the Upton Facility to either Cedar Hills Family Clinic, located at 717 Pine St., Upton Wyoming (approximately 30 miles southeast from the Upton Facility on Highway 16), or to Moorcroft Clinic, located at 101 W. Crook St., Moorcroft, Wyoming (approximately 20 miles northeast from the Upton Facility on Highway 16).

6.2 Medical Emergency Response Procedures

In the event of a medical emergency or fatality, the following procedures should be followed:

- Assess the location and severity of the situation. Do not take health or safety risks by entering a dangerous or unstable area
- Address life-threatening issues such as lack of pulse, blocked air passages, or severe bleeding using basic first aid techniques
- Notify the EHSO and the ERT according to established protocols
- Assist in securing the situation and transporting the victim under the direction of the ERT

Report any accidents or injuries at the mine site to the Mine Safety and Health Administration (MSHA) (1-800-746-1553) immediately, but no later than 15 minutes from the time the accident occurred or is known about, as discussed in Section 8.

Medical emergency response procedures will be implemented immediately upon notice of an accident or fatality. First responders will notify the Security Gate personnel who will immediately send an emergency response vehicle equipped with first aid equipment to the scene of the accident.

6.3 Medical Emergency Notification and Reporting

The EHSO is responsible for maintaining the following records:

- Person or people involved
- Date, time, and location of accident
- Description of the situation and site conditions
- Measures taken to prevent its reoccurrence
- Actions used to control the extent and severity of the problem
- Final disposition of the patient

The EHSO is responsible for data management, record keeping, and reporting to the appropriate regulatory authorities and stakeholders.

Section 7.0 - Transport and Storage of Hazardous Materials

All chemicals, fuels, and other materials contaminated by hazardous substances will be transported to their destination in designated shipping containers. Hazardous materials will be stored in facilities designated for the storage of such materials.

All suppliers of hazardous materials will be required to have their own emergency response procedures in place as part of their contractual agreements. Supply contractors will be required to provide the following information corresponding to the regulatory requirements associated with the material they supply:

- Environmental liability insurance.
- Evidence of employee and driver training in safety and emergency response.
- Appropriate plans for spill prevention, control, and clean-up for equipment and vehicles.
- Sensitivity maps to identify environmentally sensitive areas or areas with potential social or public safety issues along drive routes.
- Contingency plans for responding to plausible emergencies, including response equipment and third party contacts to respond to emergencies.

Prior to finalizing contracts with potential suppliers, suppliers' emergency response and contingency plans will be reviewed in compliance with corporate, local, national, and international standards.

Section 8.0 - Regulatory Reporting

8.1 Wyoming Water Quality Rules and Regulations

Chapter 4 of the Wyoming Water Quality Rules and Regulations (WWQRR) regulates the containment, cleanup and disposal of oil or hazardous substances released to waters of the State, or which threaten to enter waters of the State.

Pursuant to Chapter 4 of the WWQRR, the following spills/releases are reportable to the Wyoming Department of Environmental Protection (WDEQ):

1. Releases of "oil" and "hazardous substances" which enter waters of the State.
2. Releases that are determined to be a threat to enter waters of the state and are: a) considered a "hazardous substance", or b) any amount greater than either 10 barrels of any combination of crude oil/petroleum condensate/produced water OR 25 gallons of refined crude oil products.
3. Suspected releases from above or underground storage tanks are regulated by Chapter 17, WWQRR.
4. Please note that non-reportable spill events are still required to be addressed immediately by containing, removing, and disposing of the released product according to WDEQ regulations.

These are the requirements for reportable spills:

1. Immediately take appropriate action to stop and contain the release.
2. Immediately notify the division of the type, quantity and location of the release, and of the response, containment and cleanup actions which have been taken or are proposed to be taken. Call 307-777-7781 24 hours a day, 7 days a week. During non-working hours, this number should ONLY be used for spills and emergencies.
3. Immediately proceed to correct the cause of the release.
4. Within seven (7) days following a release, submit a complete written report to the division describing the reportable release and steps taken to prevent a reoccurrence.
5. Specific questions related to reporting requirements can be answered by contacting the Wyoming DEQ Emergency Response Coordinator at 307-777-5885.
6. There are also federal reporting requirements. Spills should be reported to:
National Response Center 1-800-424-8802 or the
U.S. EPA Region VIII (303) 293-1788

The reporting procedures will include the following:

- Name, address, and telephone number of the manager/operator
- Name, address, and telephone number of the facility
- Date, time, type of incident, condition, or circumstance
- Name and quantity of materials released
- Human or animal injury or mortality
- An assessment of the actual or potential hazard to human health and/or the environment outside of the facility, and
- Estimated quantity and proposed remediation of the recovered material from the occurrence

8.2 Mine Safety and Health Administration

Any accidents or injuries must be reported to the MSHA (1-800-746-1553) immediately, but no later than 15 minutes from the time the accident occurred or is known about, or should be known about, including:

- A death of an individual at a mine;
- An injury to an individual at a mine which has a reasonable potential to cause death;
- An entrapment of an individual for more than thirty minutes or which has a reasonable potential to cause death;
- An unplanned inundation of a mine by a liquid or gas;
- An unplanned ignition or explosion of gas or dust;
- An unplanned ignition or explosion of a blasting agent or an explosive;
- An unplanned roof fall at or above the anchorage zone in active workings where roof bolts are in use; or an unplanned roof or rib fall in active workings that impairs ventilation or impedes passage;
- A rock outburst that causes withdrawal of miners or which disrupts regular mining activity for more than one hour;
- An unstable condition at an impoundment, refuse pile, or culm bank which requires emergency action in order to prevent failure, or which causes individuals to evacuate an area; or, failure of an impoundment, refuse pile, or culm bank;
- Damage to a slope which endangers an individual or which interferes with use of equipment for more than thirty minutes; and
- An event at a mine which causes death or bodily injury to an individual not at the mine at the time the event occurs.
- An unplanned ignition or explosion of a blasting agent or an explosive, or an unplanned fire not extinguished within 30 minutes of discovery on-site

8.3 Occupational Safety and Health Administration

The Upton Facility will likely be regulated by OSHA. This ERCP does not reflect requirements for reporting accidents or injuries to OSHA but will require updating prior to plant construction. Any additional reporting requirements for other agencies will also be identified at that time.

8.4 United States Nuclear Regulatory Commission

Both the Bull Hill Mine and Upton Facility will be subject to a Nuclear Regulatory Commission (NRC) Source Material Possession License. At the Upton Facility, there will be intermittent storage of low level activity thorium waste that will be shipped offsite to a low level radiological disposal facility. There will be requirements for the storage of that waste through the NRC as part of the license.

Section 9.0 - Additional Emergency Response Procedures

9.1 Hazard Recognition

Employees will undergo formal safety training and task training by experienced personnel. This training will include techniques in hazard identification and recognition. The training will also identify potential hazards associated with the mine and specific job tasks. Following training, employees will be responsible for identifying potential hazards as part of their normal job requirements. Rapid recognition of potentially hazardous situations can avert an emergency. Weekly safety meetings will be held among all staff to discuss a broad range of health and safety topics, but will periodically address the following:

- Specific tasks to be performed
- Time constraints
- Hazards that may be encountered, including their effects; how to recognize symptoms and other danger signals
- Emergency procedures

9.2 Emergency Response Training

The EHSO will coordinate emergency response training. The ERT will participate in annual training at the mine site to ensure that all members are trained in equipment use and emergency response methods. ERT members will be trained in the transportation of hazardous materials, firefighting, spill control and mitigation, first aid, and personnel rescue techniques.

Onsite emergency personnel, who have roles in addition to their normal duties, will have a thorough understanding of emergency response procedures. Training will be directly related to their specific emergency response roles, and may include:

- Emergency chain-of-command
- Communication methods and signals
- How to call for help
- Emergency equipment and its use
- Emergency evacuation while wearing protective equipment
- Removing injured personnel from enclosed spaces
- Offsite support and how to use it
- Working in closed and/or oxygen deficient spaces
 - Fire rescue training will include annual training sessions comprised of the following:
 - Activating the fire suppression system
 - Performing drills to put out fires
 - Responding to practice rescue scenarios

Emergency personnel will receive training in first aid and CPR and will practice hands-on rescue techniques on an annual basis at a minimum. Training will also include recognizing and treating chemical and physical injuries and heat stress.

9.3 Employee and Contractor Training

The ERT, under the responsible charge of the EHSO, will provide safety and emergency response training to all staff. The training will identify general hazards associated with the mining industry as well as hazards specific to the Bull Hill Mine and Upton Facility. Training will review standard operating procedures, use of protective equipment, signaling an emergency (the alarm to be used, how to summon help, what information to give, and who to give it to), evacuation routes and refuges, reporting protocol when an alarm sounds, and other general safety procedures. Emergency response training will also be provided to train staff on emergency response procedures, chains of command, and responsibilities of key individuals.

Safety, emergency response, and first aid training will be provided at the time of hire. All staff will also be required to attend annual refresher courses. Contractors that perform any work on site will be required to show evidence of appropriate health, safety, and emergency response training. The Bull Hill Mine and Upton Facility will develop orientation programs to advise contractors and site visitors on basic health, safety and emergency procedures such as emergency signals and evacuation routes.

9.4 Emergency Operations Plans

Emergency Operations Plans will be developed as each new facility is built for the Bear Lodge Project. These plans will be very specific to the operations occurring at each facility.

Section 10.0 - Company Commitment

Rare Element Resources is committed to operating at the highest standards to protect the health and safety of its workers, the public, and the environment. Therefore, the Bull Hill Mine and Upton Facility employees will develop and maintain the ERCP in compliance with applicable laws and industry standards to ensure a timely and appropriate response to emergencies.

The ERCP was developed to provide specific emergency response guidelines for employees and managers of RER. The plan also identifies who will be responsible for plan implementation and the required records and reporting procedures to ensure safe operations at the site.

Section 11.0 - References

Beck Consulting, 2013, *Crook County Wyoming Multi-Hazard Mitigation Plan*, December 22.

Golder Associates, 2014, *Bear Lodge Project, Bull Hill Mine – Pre Feasibility Hydrology and Hydraulics*, Rev E, February 13

Rare Element Resources, 2012, *Bear Lodge Project Health and Safety Plan*, June 2012.

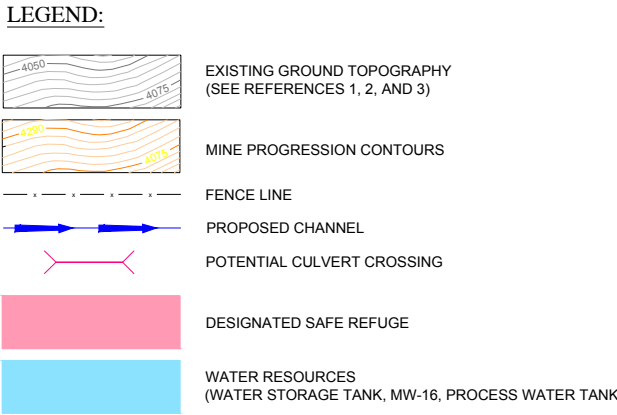
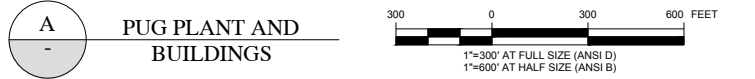
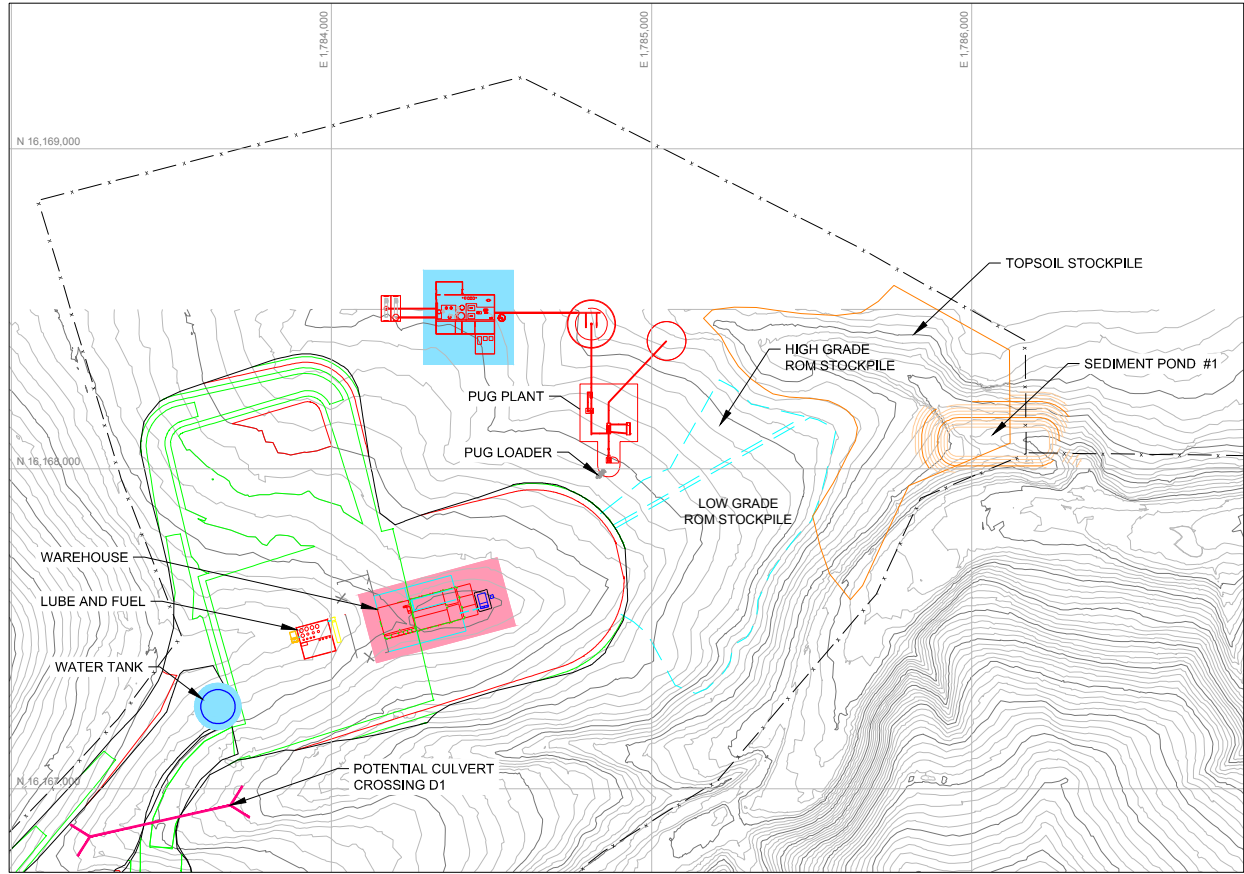
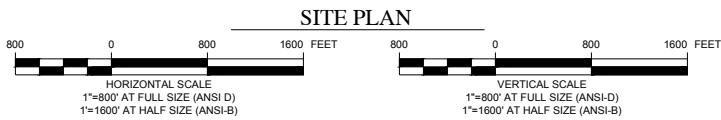
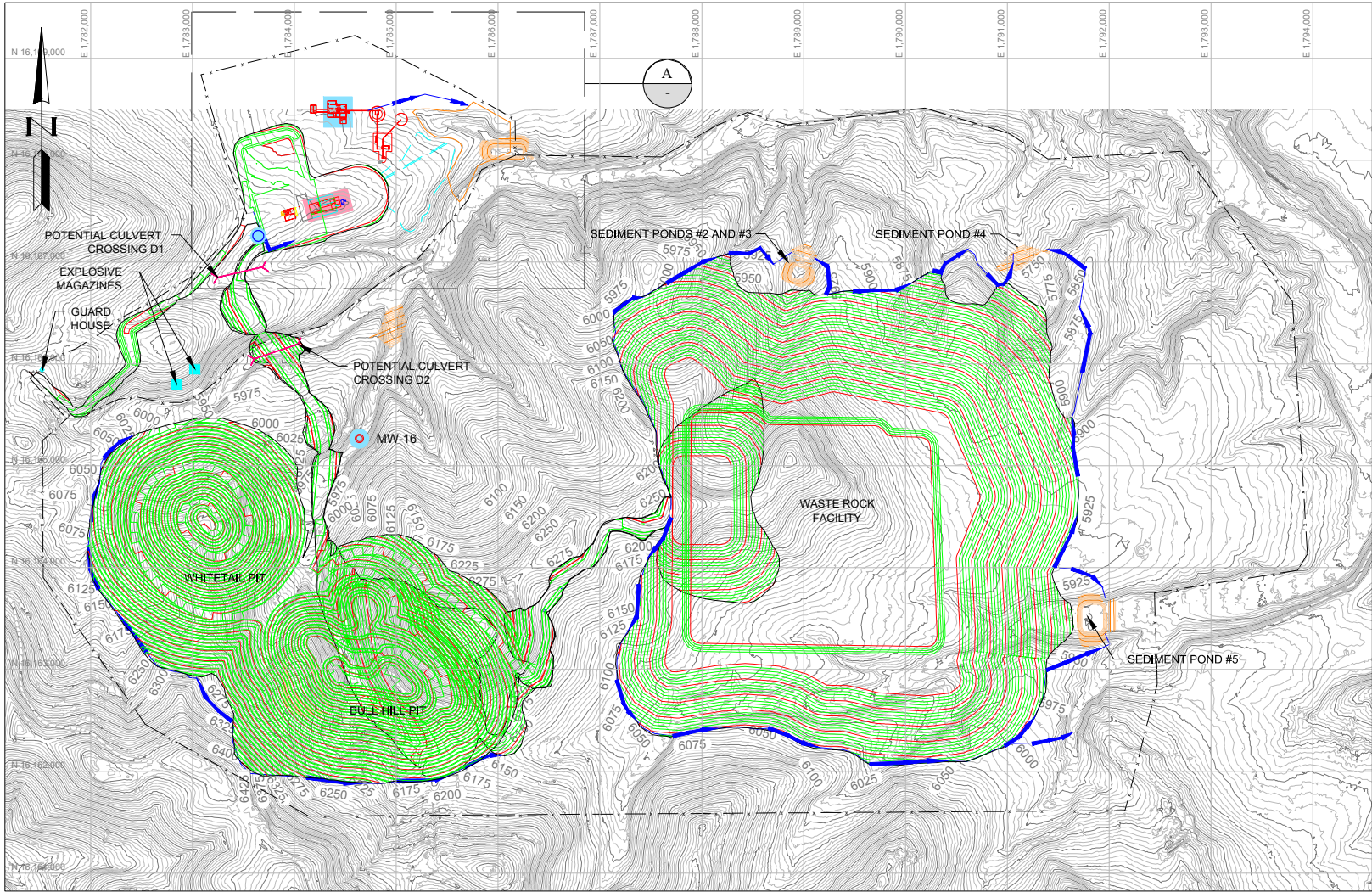
Rare Element Resources (RER). 2014. *Bear Lodge Project Plan of Operations for Mining Activities on National Forest System Lands*, February.

Wyoming Department of Environmental Quality, 2014, *Wyoming Water Quality Rules and Regulations – Chapter 4 – Emergency Response and Spills*, accessed June 2014.

Section 12.0 - Acronyms and Abbreviations

BHNF	Black Hills National Forest
CPR	cardiopulmonary resuscitation
EH&S	Environmental, Health, and Safety
EHSO	Environmental, Health and Safety Officer
ERCP	Emergency Response and Contingency Plan
ERT	Emergency Response Team
FPCP	Fire Prevention and Control Plan
hydromet	hydrometallurgical
Knight Piésold	Knight Piésold and Company
MSDS	Material Safety Data Sheet
MSHA	United States Department of Labor, Mine Safety and Health Administration
NRC	Nuclear Regulatory Commission
OSHA	Occupational Safety and Health Administration
PUG	Physical Upgrade
RER	Rare Element Resources, Inc.
RSO	Radiation Safety Officer
SCUBA	self-contained breathing apparatus
TSF	tailings storage facility
USFS	United States Forest Service
WDEQ	Wyoming Department of Environmental Protection
WWQRR	Wyoming Water Quality Rules and Regulations

Figures

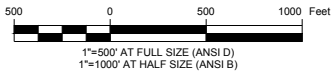
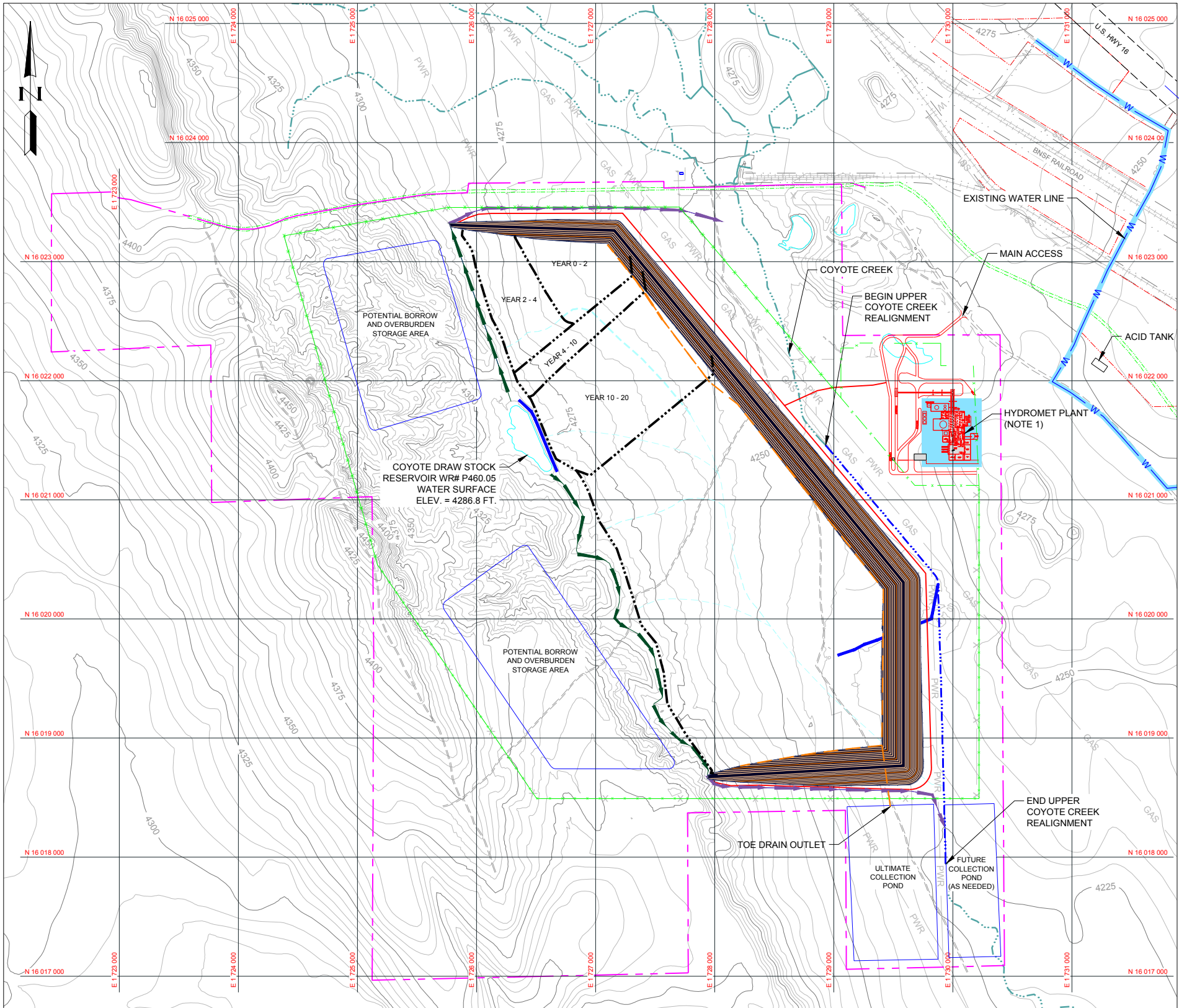


PRELIMINARY FEASIBILITY DESIGN
NOT FOR CONSTRUCTION

REFERENCES:

- EXISTING GROUND CONTOURS GENERATED BY GOLDER USING 10m USGS DEM. COORDINATE SYSTEM REFERENCE: UTM ZONE 13 NORTH NAD 1927 US FEET.
- EXISTING GROUND CONTOURS FROM SURVEY BY BEAR LODGE ENGINEERING & SURVEYING DATED 10/4/12. DATUM ADJUSTMENT FACTOR APPLIED TO ORIGINAL SURVEY TO USE UTM ZONE 13 NORTH NAD 1927 US FEET.
- EXISTING UTM CONTOURS PROVIDED BY BEAR LODGE ENGINEERING & SURVEYING DATED 10/4/12.
- WATER SURFACE ELEVATIONS FROM BEAR LODGE ENGINEERING & SURVEYING DATED 10/4/12.

PROJECT	BEAR LODGE PROJECT EMERGENCY RESPONSE CONTINGENCY PLAN				
TITLE	BULL HILL MINE FACILITIES ARRANGEMENT				
CLIENT	RARE ELEMENT RESOURCES INC.				
<div>Knight Piésold CONSULTING</div>					
DESIGNED BY	RS	LOCATION	PROJECT NUMBER	FIGURE NUMBER	REVISION
DRAWN BY	AL	DV101	00402.21	4.1	A
ACTIVITY CODE	N/A	XREF NUMBER	N/A		



LEGEND

- EXISTING GROUND TOPOGRAPHY (SEE REFERENCES 1, 2, AND 3)
- EMBANKMENT CONTOURS
- EXISTING FENCE
- EXISTING GAS LINE
- EXISTING POWER LINE
- EXISTING WATER LINE
- EXISTING SANITARY SEWER LINE
- EXISTING RAILROAD TRACKS AND ROW
- EXISTING ROAD
- EXISTING DRAINAGE
- PROJECT BOUNDARY
- SURFACE WATER DIVERSION CHANNEL
- RIP-RAP SURFACE WATER DIVERSION CHANNEL
- TOE-DRAIN
- HAUL ROADS
- COYOTE CREEK REALIGNMENT
- FENCE
- APPROXIMATE TSF EXPANSION LIMITS
- DESIGNATED SAFE REFUGE
- WATER RESOURCES (PROCESS WATER TANK AND CITY WATER SUPPLY)

NOTES:

- PRELIMINARY HYDROMET PROCESSING PLANT LOCATION AND ACCESS PROVIDED BY GOLDER, OCTOBER 31, 2013 FOR GENERAL PROJECT FACILITY LOCATIONS. FINAL PLANT SITE LAYOUT AND ACCESS TO BE DETERMINED BY RER.
- ULTIMATE TSF EMBANKMENT CREST ELEVATION = 4290ft
- ULTIMATE DRY STACK TAILINGS ELEVATION = 4360ft

REFERENCES:

- EXISTING GROUND CONTOURS GENERATED BY GOLDER USING 10m USGS DEM. COORDINATE SYSTEM REFERENCE: UTM ZONE 13 NORTH NAD 1927 US FEET.
- EXISTING GROUND CONTOURS FROM SURVEY BY BEAR LODGE ENGINEERING & SURVEYING DATED 10/4/12. DATUM ADJUSTMENT FACTOR APPLIED TO ORIGINAL SURVEY TO USE UTM ZONE 13 NORTH NAD 1927 US FEET.
- EXISTING UTM CONTOURS PROVIDED BY BEAR LODGE ENGINEERING & SURVEYING DATED 10/4/12.
- WATER SURFACE ELEVATIONS FROM BEAR LODGE ENGINEERING & SURVEYING DATED 10/4/12.

PRELIMINARY FEASIBILITY DESIGN
NOT FOR CONSTRUCTION

PROJECT		BEAR LODGE PROJECT EMERGENCY RESPONSE AND CONTINGENCY PLAN			
TITLE UPTON FACILITIES ARRANGMENT					
CLIENT RARE ELEMENT RESOURCES INC.					
Knight Piésold CONSULTING					
DESIGNED BY	RS	LOCATION	PROJECT NUMBER	FIGURE NUMBER	REVISION
DRAWN BY	AL	DV101	00402.21	4.2	A
ACTIVITY CODE	N/A	XREF NUMBER	N/A		

Appendix A

Spill Report Form

**Appendix A
Spill Reporting Form**

Date: _____ **Time:** _____

Name and Contact Number: _____

Supervisor and Contact Number: _____

Department: _____

Nature of Incident: _____

Was Medical Attention Required? _____

If so, describe: _____

Identity of Released Chemical (or its components): _____

Medium or Media into which Release Occurred:

___ Air ___ Land ___ Sewer ___ Building or Room Other _____

Duration of Event or Release: _____

Estimated Quantity of Material Released: _____

Description of Incident: _____

Any Actions Taken to Clean Up Release: _____

Actions to Prevent Reoccurrence of the Accident:
